COMMERCE DEPARTMENT

August 24, 2018

Daniel P. Wolf
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, Minnesota 55101-2147

RE: **Response Comments of the Minnesota Department of Commerce, Division of Energy Resources**
Docket No. G011/M-18-182

Dear Mr. Wolf:

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

> Petition of Minnesota Energy Resources Corporation for Approval of a Natural Gas Extension Project (NGEP) Cost Rider Surcharge for the Recovery of 2019 Rochester Project Costs.

The Petition was filed on February 28, 2018 by:

> Amber Lee
> Regulatory and Legislative Affairs Manager
> Minnesota Energy Resources Corporation
> 2685 145th Street West
> Rosemount, MN 55068

As discussed further in the attached Response Comments, the Department recommends that the Minnesota Public Utilities Commission (Commission) authorize MERC to implement an NGEP rider surcharge of $0.00050 per therm effective January 1, 2019 for NGEP-related costs expected to be incurred in calendar year 2019.

The Department is available to answer any questions that the Commission may have.

Sincerely,

/s/ ADAM J. HEINEN
Public Utilities Rates Analyst

AJH/ja
Attachment

Before the Minnesota Public Utilities Commission

Response Comments of the Minnesota Department of Commerce Division of Energy Resources

Docket No. G011/M-18-182

I. INTRODUCTION

On February 28, 2018, pursuant to Minnesota Statute 216B.1638 (NGEP Statute) and the Minnesota Public Utilities Commission's (Commission) May 5, 2017 *Order*, Minnesota Energy Resources Corporation (MERC or the Company) submitted to the Commission a petition (*Petition*) for Approval of a Natural Gas Extension Project (NGEP) Cost Rider Surcharge (NGEP Rider) for the recovery of 2019 Rochester Project Costs (Rochester Project or Project). In its *Petition*, MERC requested recovery of its projected NGEP-related costs in 2019 for its Rochester Project in accordance with Minnesota Statute 216B.1638 (NGEP Statute). In particular, MERC requested approval of the following:

- An ongoing NGEP rider;
- A forecasted 2019 revenue deficiency of approximately $1.3 million for MERC's projected 2019 investments related to the Rochester Project subject to future true up.[1] The Company requested recovery of the entire revenue deficiency through the NGEP Rider;
- A 2019 NGEP rate factor of $0.00150 per therm applicable to all customer classes to be effective January 1, 2019; and
- Proposed NGEP Rider tariff sheets.

On May 29, 2018, the Minnesota Department of Commerce, Division of Energy Resources (Department) filed its *Comments* in this matter. In its *Comments*, the Department noted several areas of concern in the Company's *Petition*, including:

- MERC's current interpretation of the 33 percent provision in the NGEP Statute that is vastly different than MERC's previous interpretation and the record on which the NGEP rider was established;
- MERC's proposed inclusion of contingency costs in its cost recovery proposal;
- the Company's treatment of Contribution-in-Aid-of-Construction (CIAC) for NGEP purposes; and
- the sales MERC used to calculate the NGEP surcharge.

[1] The Company noted that the proposed surcharge will be subject to revision based on the outcome of this proceeding and decisions in MERC's pending general rate case, Docket No. G011/GR-17-563.

The Department also recommended that the Commission consider revising its May 5, 2017 *Order Approving Rochester Project and Granting Rider Recovery with Conditions* in Docket No. G011/M-15-895 (Docket No. 15-895 or Rochester Docket) regarding Destination Medical Center (DMC) funding requests.

On June 8, 2018, MERC filed *Reply Comments* responding the Department's concerns and recommendations.

The Department provides the information below to assist the Commission.

II. SUMMARY OF UTILITY'S FILING

In its *Reply Comments*, MERC responded to four general areas from the Department's *Comments*:

1. Whether MERC's current legal interpretation of the NGEP Statute is correct;
2. Whether project contingency costs should be included in the surcharge calculation;
3. Whether revenues from CIAC should be calculated as an offset to the surcharge calculation; and
4. Whether MERC used the appropriate sales figures in its surcharge calculation.

The Department responds separately to each of these areas below.

III. DEPARTMENT'S ANALYSIS

A. MERC'S CURRENT LEGAL INTERPRETATION OF THE NGEP STATUTE

The Department raised objections in its *Comments* regarding the Company's calculation of the NGEP surcharge and its current interpretation of the NGEP Statute. The Department noted on page 4 of its *Comments* that:

> MERC's current interpretation of Statute contradicts MERC's prior representation to the Commission about the amounts that would be recovered in the NGEP Rider in Docket No. 15-895. That is, the Company's current interpretation about the amount to be recovered through the NGEP Rider for the Rochester Project is inconsistent with the record on which the Commission relied to approve MERC's NGEP Rider for the Rochester Project.

Specifically, MERC stated that the NGEP Statute authorizes the Commission to approve recovery of up to 33 percent of costs of a project, or $14,522,180, which is 33 percent of total costs of $44,006,607, through the NGEP Rider. However, this interpretation contradicts MERC's prior interpretation in the Rochester Docket in which the Commission approved the Project. As discussed further below, in Docket No. 15-895, the Company requested recovery of *33 percent of the revenue deficiency* associated with the Project.

Moreover, all information and analysis provided by the Company in that record was based on MERC's original interpretation that the 33 percent applied to the annual revenue requirement. Based on this information, the Department recommended an adjustment to the maximum amount eligible for NGEP rider surcharge in 2019.

In its *Reply Comments*, MERC disagreed with the Department's conclusions and recommendations. MERC argued that neither the plain language of the NGEP Statute nor the Commission's Order in Docket No. 15-895 (Rochester Order) undermines the Company's interpretation in the *Petition*. MERC argued that the statutory language is clear and unambiguous and the cap applies to the overall costs of the natural gas extension project, not the annual revenue requirement recommended by the Department. As such, the Company stated that it calculated the 2019 NGEP surcharge in accordance with the plain language of the statute. In addition, MERC argued that the Commission's Rochester Order does not support the Department's interpretation of rider cost recovery, or the Department's conclusion that the Commission based its approval in Docket No. 15-895 on this interpretation, given the wording of its Order. MERC stated that all of the discussion in the Commission's Rochester Order regarding the statutory cap supports the Company's interpretation in this rider petition. MERC also noted that it provided different examples in Docket No. 15-895 to illustrate how the NGEP Rider might be calculated under various cost recovery assumptions.[2]

The Department disagrees. As discussed below, the Company's arguments do not accurately reflect the contested-case record used by the Commission in its Rochester Order. The Department responds to the Company's statements.

First, the Department addressed on pages 3-4 of its May 29, 2018 *Comments* in the instant case how MERC's proposal is not consistent with the NGEP statute, stating in part that: "MERC's proposed revenue deficiency is not calculated as prescribed in the NGEP Statute, since the Company proposes to recover 100 percent, not 33 percent, 'of the costs of a natural gas extension project.'"

[2] MERC *Reply Comments*, Exhibit A.

MERC stated the following on page 2 of its *Reply Comments*:

> The language of the NGEP Rider Statute with respect to the 33 percent cap provides that "[t]he commission must not approve a rider under this section that allows a utility to recover more than 33 percent of the costs of a natural gas extension project." The statutory language is clear and unambiguous—the cap applies to the overall costs of the natural gas extension project, not to the annual revenue requirement calculation as proposed by the Department. MERC calculated the 2019 NGEP surcharge in accordance with the plain language of the statute.

However, MERC's interpretation is incorrect and confuses the issue of a cap and cost recovery. Since capital costs are recovered through rates, which are based on revenue requirements, it is clear that MERC's proposed interpretation would allow the Company to recover more than 33 percent of costs through the NGEP Rider, which is not allowed by the NGEP Statute. Thus, the Company's interpretation would violate the NGEP's clear statutory directive that "the commission must not approve a rider under this section that allows a utility to recover more than 33 percent of the costs of a natural gas extension project."[3]

Second, MERC stated that the Commission's Rochester Order does not specify how the NGEP would be calculated. However, the Commission's Rochester Order is based on the record in that proceeding. The Department discussed on pages 4-5 of its May 29, 2018 *Comments* how MERC represented that the NGEP would be calculated. For more examples of MERC's representations in the Rochester Docket, MERC's Initial Filing stated:

> **1.6 Project Cost and Cost Recovery**
> Phase II construction costs are estimated to be approximately $44 million. Pursuant to the NGEP Statute, *MERC requests recovery of 33 percent of the revenue deficiency associated with MERC's Phase II costs through the rate rider*, with the balance of Phase II costs recovered in future rate cases. (Emphasis added).[4]

Further, MERC's calculations of the annual bill impacts on ratepayers are on page 89 of MERC's Initial Filing, which showed, for example, that the annual bill impacts would be $0.08 per Residential customer in 2017 and $1.56 per Residential customer in 2023. These amounts were calculated by applying the 33 percent factor to the annual revenue deficiencies. As the

[4] October 26, 2015 Initial Filing, Page 4, Docket No. G011/M-15-895.

Commission Staff's *Briefing Papers* identifies these same amounts on page 95, it is clear that this was the information before the Commission when it approved the Rochester Project.[5]

By contrast, MERC now proposes to charge ratepayers approximately $880,000 more in 2019 under the NGEP Rider due solely to MERC's new interpretation of the NGEP Statute, compared to the Company's representation to the Commission in the Rochester Docket.[6]

MERC stated that it included different cost recovery examples in Docket No. 15-895; however, these examples are not in the record in that proceeding. MERC did not provide such information in its petition, and chose not to provide its responses to discovery in the record. Thus, the Company's annual revenue requirements interpretation is the only cost recovery information provided in the record evidence in the Rochester Docket.[7]

Moreover, the Department disagrees with the Company's argument that the Commission's Rochester Order supports MERC's new interpretation of the NGEP Statute. The Commission stated the following:

> MERC seeks to recover a portion of the project's costs under the NGEP statute, which allows rider recovery of *one third of the revenue deficiency* from an eligible natural gas extension project. The remaining costs would be recovered through base rates or the Company's purchased-gas-adjustment rider. *Emphasis added. May 5, 2017 Order,* Docket No. G011/M-15-895 on page 1.

Thus, there is no question that the Commission understood MERC's request to establish the rider to pertain to allowing recovery of one third *of the revenue deficiency,* as under normal ratemaking. Moreover, MERC did not request reconsideration of the Commission's Order, which described MERC's request on page 1 as to revenue requirements.

In addition, the Commission's Order references base rate recovery for the other 66 percent of project costs,[8] which shows that *the Commission envisioned standard ratemaking* through costs being converted to revenue requirements for remaining costs:

[5] March 23, 2017 *Briefing Papers* in Docket No. G011/M-15-895.
[6] Using MERC's proposed $1,319,864 and the method in the Rochester Docket, MERC would charge ratepayers for 33 percent of $1,319,864, which is $439,955. The difference between these figures is $879,909.
[7] December 7, 2015 *Reply Comments*, Attachment D, Docket No. G011/M-15-895 and *Direct Testimony* of MERC Witness Amber Lee, Exhibit ASL-1.
[8] The Department notes that base rate recovery of the remaining 66 percent is the Company's proposal in Docket No. 15-895. Direct Testimony of MERC Witness Amber Lee, Page 17.

> MERC may recover up to 33 percent of its cost to upgrade the Rochester-area distribution system through an NGEP rider surcharge on all customers, *with the remainder to be recovered through base rates.* Recovery will be capped at the Company's initial cost estimate of $44 million unless MERC can establish that the overruns are reasonable. *Emphasis added*. May 5, 2017 Order, Docket No G011/M-15-895 on page 3.

As a result, it is not appropriate for MERC to assert at this point that the Commission made its decision in Docket No. 15-895, based on what is now MERC's new interpretation of the NGEP statute. Moreover, it is not appropriate for MERC, in seeking approval of the Rochester Project, to represent that ratepayers would be charged about $440,000 through the NGEP and then insist that the Company is entitled to charge ratepayers $1,319,864.

After reviewing the Company's *Reply Comments*, the Department maintains its position, and recommended adjustments, associated with its interpretation of cost recovery for the NGEP Rider. Based on the record in Docket No. 15-895, in which the Commission established this rider, it is clear that the 33 percent figure in the NGEP Statute should be applied to the annual, incremental revenue requirement or revenue deficiency. This was the original proposal presented by the Company and was the basis for all ratepayer impacts presented in the Rochester Docket record to the Commission.[9]

B. INCLUSION OF PROJECT CONTINGENCY COSTS IN THE SURCHARGE CALCULATION

In its *Comments*, the Department raised concerns regarding the Company's inclusion of contingency costs in its NGEP Rider surcharge calculation. The Department concluded that including contingency costs in the NGEP surcharge is inappropriate unless MERC demonstrates that the Company has already exceeded its initially proposed costs, and has done so in a reasonable manner that would warrant charging MERC's customers for the higher costs. The Department concluded that MERC has not shown this and, in fact, information in the Company's pending rate case (Docket No. G011/GR-17-563) suggests that MERC has not incurred Rochester costs at a level that warrants inclusion of contingency costs in the rider surcharge. The Department recommended that, to the extent that contingency costs are appropriately incurred, costs may be recovered from ratepayers, via the NGEP rider (up to the limit set by the Commission) or base rates, but not until after they are incurred and MERC has met the Commission's requirement to demonstrate that the Company incurred such costs

---

[9] December 7, 2015 *Reply Comments*, Attachment D, Docket No. G011/M-15-895 and *Direct Testimony* of MERC Witness Amber Lee, Exhibit ASL-1.

prudently. Given this analysis, the Department recommended an adjustment to remove the contingency costs from the NGEP surcharge amount for 2019.

MERC responded that it accepts the Department's recommended adjustment to the NGEP Rider surcharge, with the understanding that all actual capital and expense amounts incurred in 2019 will be subject to true-up through the rider true-up mechanism. The Department confirms that MERC's understanding is correct; to the extent that costs or expenses are reasonable in 2019, and they are within the recovery limit set by the Commission, they will be subject to true-up through the rider mechanism. The Department appreciates the Company's agreement on this issue.

C. REVENUES FROM CIAC AS AN OFFSET TO THE SURCHARGE CALCULATION

The Department discussed at length in *Comments* the issue of CIAC in the NGEP. The NGEP Statute requires that the NGEP Rider include the amount of any CIAC as an offset to the revenue deficiency. In its *Petition*, MERC stated that no CIAC revenues are associated with the Project because the entirety of costs relate to improvements to MERC's Town Border Station (TBS) system and do not directly serve a specific customer. The Department disagreed with the Company's position because any extension in the Rochester Area is predicated on the capacity associated with the Rochester Project and that the NGEP Statute references CIAC in the calculation of the revenue deficiency. Based on the NGEP Statute, the Department concluded that any CIAC-related revenues recovered in the Rochester Area[10] should be credited as an offset to the revenue deficiency. Using the average of actual CIAC recovered in the Rochester Area in 2016 and 2017, the Department calculated an adjustment to the 2019 NGEP surcharge.

The Company responded in *Reply Comments* that the Department's interpretation of CIAC is contrary to other provisions in the NGEP Statute. MERC argued that the NGEP Statute includes a specific definition of CIAC. Minnesota Statute 216B.1638, Subd. 1(b) states:

> "Contribution in aid of construction" means a monetary contribution, paid by a developer or local unit of government to a utility providing natural gas service to a community receiving that service as the result of a natural gas extension project, that reduces or offsets the difference between the total revenue requirement of the project and the revenue generated from the customers served by the project.

[10] For a discussion of the complex rate design for this rider, please see the Department's May 29, 2018 *Comments* in this proceeding, beginning on page 7.

The Company further stated that, under this definition, CIACs that serve to offset the total NGEP-eligible revenue deficiency are only those that are paid by a developer or local unit of government because of the natural gas project, and the contribution must be paid and assessed because of a specific NGEP project. MERC concluded that the Department's interpretation, based on the definition of revenue deficiency, and at the exclusion of other parts of the NGEP Statute, is inappropriate and that the Department's recommended adjustment is unsupported by the plain language of the statute and should not be adopted.

On further review, the Department agrees with MERC that the definition of CIACs are limited only to amounts paid by a developer or local unit of government. As a result, the Department withdraws its recommended adjustment for CIACs. Removal of the Department's original CIAC adjustment affects the proposed amount eligible for NGEP Rider recovery, which is detailed in Department Attachment R-1. Based on this modification, the Department recommends that the NGEP Rider for 2019 be set at $0.00050 per therm.

D. APPROPRIATE SALES FIGURE IN THE SURCHARGE CALCULATION

In its *Comments*, the Department raised concerns regarding the sales forecast used by MERC to calculate its NGEP surcharge. Specifically, the Department observed that the Company's proposed sales figures included non-jurisdictional sales from Michigan and did not factor in sales growth for customers outside the Rochester Area. Given these concerns, the Department recommended that the Commission adjust the sales forecast used to calculate the NGEP surcharge. The Department recommended that the Commission base the NGEP Rider sales on the Department's sales forecast in the Company's pending rate case adjusted for growth in calendar year 2019. However, in the event that the Commission determines that an adjustment to rate case sales is not necessary, the Department recommended that the sales forecast be calculated based on Minnesota jurisdictional sales as presented in the Company's pre-filed forecasting data in the pending rate case.

In its *Reply Comments*, the Company agreed with the Department's recommendation that the sales forecast in this proceeding factor in sales growth through 2019 and that whatever sales are approved in MERC's pending rate case should be used to calculate the rider surcharge. The Department does not have additional comment on this issue and appreciates MERC's agreement on this topic.

E. OTHER FUNDING SOURCES

In its Order in Docket No. 15-895, the Commission required MERC to apply for Destination Medical Center Corporation (DMCC) funding whenever the Company undertakes projects within the DMCC district.[11] After reviewing information from the DMCC, the Department

[11] May 5, 2017 Order in Docket No. G011/M-15-895. Ordering Point No. 9a.

recommended in its *Comments* that the Commission modify its order such that MERC is not required to submit a funding application to the DMCC for all work conducted in the DMCC district. Based on the DMCC's current funding position, the Department concluded that funding was unlikely to be awarded and that repeated requests would not represent a prudent use of resources. However, the Department recommended that the Commission require MERC to maintain conversations with the DMCC to ascertain whether its position regarding infrastructure funding changes or evolves in the future.

In its *Reply Comments*, MERC agreed with the Department's analysis and conclusions regarding DMCC funding. The Company also agreed with the Department's recommendation that the Commission modify its order in Docket No. 15-895 such that MERC is no longer required to submit DMCC funding applications for all work done inside the DMCC district. MERC also agreed to maintain conversations with the DMCC to ascertain whether the DMCC's position regarding infrastructure funding changes or evolves in the future. The Department appreciates the Company's agreement on this issue.

IV. CONCLUSIONS AND RECOMMENDATIONS

Based on its review of the Company's *Reply Comments*, the Department largely maintains its recommendations from *Comments*, with the exception of the recommended adjustment for CIACs. Specifically, the Department recommends that the Commission:

- allow MERC to implement an NGEP rider surcharge effective January 1, 2019 for NGEP-related costs to be incurred in calendar year 2019;
- set the NGEP rider surcharge using the Department's proposed NGEP rider surcharge and rate rider calculations as detailed in its *Comments*, with the exception of the adjustment for CIACs;
- set the NGEP rider surcharge at $0.00050 per therm;
- modify the Rochester Order so that MERC is not required to submit an application to the DMC for all work conducted in the DMC district given the current position of the DMCC; and
- require MERC to continue to maintain conversations with the DMC to ascertain whether its position regarding infrastructure funding changes or evolves in the future and inform the Commission if the DMCC's position changes.

/ja

Minnesota Energy Resources Corporation
2019 Natural Gas Expansion Program ("NGEP") Rider Calculation

Docket G011/M-18-____
Exhibit B

Line	Description	Reference	2018 Rate Case	2019 Forecast	Forecasted 2019 NGEP Rider
1	Expenses	O&M, Depreciation Expense, and Property Taxes	123,441	716,221	592,780
2					
3	Rate Base	13-Month Average Net Plant Value	11,382,768	20,913,764	9,530,996
4	Rate of Return	Commission Authorized 2016 Rate Case	6.8842%	6.8842%	
5	Gross Revenue Conversion Factor	Commission Authorized 2016 Rate Case1			1.402
6	Earnings on Rate Base				656,133
7	Return on Rate Base	Line 3 x Line 4 x Line 5			919,898
8					
9	**Total Revenue Requirement**	**Line 1 + Line 7**			**1,512,679**
10					
11	Offsetting Project Revenue	Based on Approved Rates from 2016 Rate Case			$ 297,561
	CIAC Offset				
12					
13	**Project Revenue Deficiency**	**Line 9 less line 11**			**1,215,118**
14	**33 percent of project revenue deficiency**				**400,989**
15	**Total Therms**				**804,961,823**
16					
17	**Per therm Increase**	**Line 13 / Line 15**			**$ 0.00050**
18					
19	Average use per Residential Customer	2016 Rate Case Sales Forecast			867
20	Average annual cost increase to Residential Customer	Line 17 x Line 19			$ 0.43
21					
22	Average use per General Service Small C&I Customer	2016 Rate Case Sales Forecast			1,015
23	Average annual cost increase to GS Small C&I Customer	Line 17 x Line 22			$ 0.51
24					
25	Average use per General Service Large C&I Customer	2016 Rate Case Sales Forecast			8,633
26	Average annual cost increase to GS Large C&I Customer	Line 17 x Line 25			$ 4.30
27					
28	Average use per Small Volume Interruptible Customer	2016 Rate Case Sales Forecast			100,593
29	Average annual cost increase to Small Volume Interruptible Customer	Line 17 x Line 28			$ 50.11
30					
31	Average use per Large Volume Interruptible Customer	2016 Rate Case Sales Forecast			667,768
32	Average annual cost increase to Large Volume Interruptible Customer	Line 17 x Line 31			$ 332.65
33					
34	Average use per Super Large Volume Interruptible Customer	2016 Rate Case Sales Forecast			11,193,727
35	Average annual cost increase to Super Large Volume Interruptible Customer	Line 17 x Line 34			$ 5,576.11

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
Response Comments

Docket No. G011/M-18-182

Dated this 24th day of August 2018

/s/Sharon Ferguson

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_18-182_M-18-182
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1800 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_18-182_M-18-182
Seth	DeMerritt	ssdemerritt@integrysgroup.com	MERC (Holding)	700 North Adams P.O. Box 19001 Green Bay, WI 543079001	Electronic Service	No	OFF_SL_18-182_M-18-182
Ian	Dobson	residential.utilities@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_18-182_M-18-182
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 551012198	Electronic Service	No	OFF_SL_18-182_M-18-182
Daryll	Fuentes	dfuentes@usg.com	USG Corporation	550 W Adams St Chicago, IL 60661	Electronic Service	No	OFF_SL_18-182_M-18-182
Amber	Lee	ASLee@minnesotaenergyresources.com	Minnesota Energy Resources Corporation	2685 145th St W Rosemount, MN 55068	Electronic Service	No	OFF_SL_18-182_M-18-182
Brian	Meloy	brian.meloy@stinson.com	Stinson,Leonard, Street LLP	50 S 6th St Ste 2600 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_18-182_M-18-182
Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP	33 South Sixth St Ste 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_18-182_M-18-182
Colleen	Sipiorski	ctsipiorski@integrysgroup.com	Minnesota Energy Resources Corporation	700 North Adams Street Green Bay, WI 54307	Electronic Service	No	OFF_SL_18-182_M-18-182

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Kristin	Stastny	kstastny@briggs.com	Briggs and Morgan, P.A.	2200 IDS Center 80 South 8th Street Minneapolis, MN 55402	Electronic Service	No	OFF_SL_18-182_M-18-182
Eric	Swanson	eswanson@winthrop.com	Winthrop & Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_18-182_M-18-182
Daniel P	Wolf	dan.wolf@state.mn.us	Public Utilities Commission	121 7th Place East Suite 350 St. Paul, MN 551012147	Electronic Service	Yes	OFF_SL_18-182_M-18-182