



December 5, 2014

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VIA E-FILING AND U.S. MAIL

The Honorable Ann O'Reilly
Office of Administrative Hearings
P.O. Box 64620
St. Paul, MN 55164-0620

RE: In the Matter of the Request of Minnesota Power for a Certificate of Need for the Great Northern Transmission Line Project
MPUC Docket No. E-015/CN-12-1163
OAH Docket No. 65-2500-31196

Dear Judge O'Reilly:

On behalf of Minnesota Power, Minnesota Department of Commerce – Division of Energy Resources, Large Power Intervenors and Ratepayers Against Not-so-Great-Northern Transmission (collectively, the "Parties"), enclosed please find the Issues Matrix of the Parties in the above-referenced docket. This document has been filed with the E-Docket system and served on the attached service list. Also enclosed is our Affidavit of Service.

Very truly yours,

WINTHROP & WEINSTINE, P.A.

/s/ Eric F. Swanson

Eric F. Swanson

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BEFORE THE MINNESOTA OFFICE OF ADMINISTRATIVE HEARINGS
600 North Robert Street
St. Paul, Minnesota 55101

FOR THE MINNESOTA PUBLIC UTILITIES COMMISSION
121 Seventh Place East, Suite 350
St. Paul, Minnesota 55101-2147

In the Matter of the Request of Minnesota
Power for a Certificate of Need for the
Great Northern Transmission Line Project

MPUC Docket No. E-015/CN-12-1163

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AFFIDAVIT OF SERVICE

STATE OF MINNESOTA)
) ss.
COUNTY OF HENNEPIN)

Mary G. Holly, of the City of Lake Elmo, County of Washington, the State of Minnesota, being first duly sworn, deposes and says that on the 5th day of December, 2014, she served the attached **Issues Matrix of All Parties** to all said persons on the attached Service List, true and correct copies thereof, by E-Filing and/or by depositing the same enclosed in an envelope, postage prepaid in the United States Mail in the post office at Minneapolis, Minnesota.

/s/ Mary G. Holly
MARY G. HOLLY

Subscribed and sworn to before me this
5th day of December, 2014.

/s/ Jane E. Justice
Notary Public

My Commission Expires: January 31, 2015

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
David	Aafedt	daafedt@winthrop.com	Winthrop & Weinstine, P.A.	Suite 3500, 225 South Sixth Street Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_12-1163_Official cc Service List
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Chad T	Marriott	ctmarriott@stoel.com	Stoel Rives LLP	900 SW 5th Ave Ste 2600 Portland, OR 97204	Electronic Service	No	OFF_SL_12-1163_Official cc Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Andrew	Moratzka	apmoratzka@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_12-1163_Official cc Service List
Ann	O'Reilly	ann.oreilly@state.mn.us	Office of Administrative Hearings	PO Box 64620 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_12-1163_Official cc Service List
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Jennifer	Smestad	jsmestad@otpc.com	Otter Tail Power Company	215 South Cascade Street Fergus Falls, MN 565380496	Electronic Service	No	OFF_SL_12-1163_Official cc Service List
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Joseph	Windler	jwindler@winthrop.com	Winthrop & Weinstine	225 South Sixth Street, Suite 3500 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_12-1163_Official cc Service List

**BEFORE THE MINNESOTA OFFICE OF ADMINISTRATIVE HEARINGS
600 North Robert Street
St. Paul, Minnesota 55101**

**FOR THE MINNESOTA PUBLIC UTILITIES COMMISSION
121 Seventh Place East, Suite 350
St. Paul, Minnesota 55101-2147**

**In the Matter of the Request by Minnesota Power
For a Certificate of Need for the
Great Northern Transmission Line**

OAH Docket No. 65-2500-31196

MPUC Docket No. E-015/CN-12-1163

ISSUES MATRIX

December 5, 2014

As requested by the Administrative Law Judge at the conclusion of the evidentiary hearing in this matter, Minnesota Power (MP or Company), the Department of Commerce – Division of Energy Resources (DOC-DER), the Large Power Intervenors (LPI) and Residents and Ratepayers Against the Not-So-Great Northern Transmission (RRANT) (collectively Parties) file this Issues Matrix, setting forth the positions of the Parties as demonstrated in the pre-filed and oral testimony in this matter, together with record sites documenting those positions.

The Issues Matrix is organized according to the Commission’s order referring this case to the Office of Administrative Hearings.¹ In the Referral Order, the Commission stated:

The ultimate issue in this case is whether the Applicant’s proposed transmission line project meets the need criteria set forth in Minn. Stat. § 216B.243 and Minn. Rules Chapter 7849. This issue turns on numerous factors that are best developed in formal evidentiary proceedings. The parties to this proceeding should address whether the proposed project meets these criteria and address these factors. The parties may also raise and address other issues relevant to the application.²

The Issues Matrix first addresses the factors set forth in Minn. Stat. §216B.243 and the Certificate of Need Criteria set forth in Chapter 7849 of the Minnesota Rules. With respect to these issues, the Company and DOC-DER witnesses agree that the record supports the granting of a Certificate of Need and no issues remain open between these two parties. LPI and RRANT may address the statutory factor and rule criteria issues in briefs.

The Issues Matrix next addresses the issues raised by LPI, regarding recommended conditions to be placed on any granting of a Certificate of Need. There is consensus between the Company, DOC-DER, and LPI on one of those issues. The Company and DOC-DER did not agree with the remaining LPI recommendations. RRANT may address the LPI issues in briefs.

¹ *In the Matter of the Request of Minnesota Power for a Certificate of Need for the Great Northern Transmission Line Project*, Docket No. E-015/CN-12-1163, Order Accepting Filing, Varying Time Lines, and Notice and Order for Hearing (Jan. 8, 2014) (the “Referral Order”).

² *The Referral Order*, pg. 4.

Certificate of Need Statute and Rule Related Issues	MP	DOC-DER	LPI	RRANT
1. <u>Should the Commission Grant MP a Certificate of Need for the Great Northern Transmission Line?</u>	Yes Ex. 34, pp. 22-26 (McMillan Direct)	Yes Ex. 56, p. 11 (Rakow Surrebuttal)	Not addressed in testimony; may be addressed in briefing	Not addressed in testimony; may be addressed in briefing
2. <u>Does the record support the granting of a Certificate of Need, considering the factors enumerated in Minn. Stat. §216B.243?</u>			Not addressed in testimony; may be addressed in briefing	Not addressed in testimony; may be addressed in briefing
(1) accuracy of long-range energy demand forecasts on which the necessity for the facility is based;	Ex. 18 (2013 Advanced Forecast Report) Ex. 43, pp. 10-13 (Rudeck Direct)	Ex. 52, pp. 3-13 (Shah Direct)	Not addressed in testimony; may be addressed in briefing	Not addressed in testimony; may be addressed in briefing
(2) the effect of existing or possible energy conservation programs under sections 216C.05 to 216C.30 and this section or other federal or state legislation on long-term energy demand;	Ex. 21 (CIP Triennial Report) Ex. 43, pp. 32-33 (Rudeck Direct)	Department addressed statutory factors by addressing rule criteria identified below	Not addressed in testimony; may be addressed in briefing	Not addressed in testimony; may be addressed in briefing

Certificate of Need Statute and Rule Related Issues	MP	DOC-DER	LPI	RRANT
<p>(3) the relationship of the proposed facility to overall state energy needs, as described in the most recent state energy policy and conservation report prepared under section 216C.18, or, in the case of a high-voltage transmission line, the relationship of the proposed line to regional energy needs, as presented in the transmission plan submitted under section 216B.2425;</p>	<p>See 2013 Biennial Transmission Projects Report filed on November 1, 2013 in MPUC Docket No. E-999/M-13-402, available at: www.minnelectrans.com/</p> <p>Applicant addressed other transmission studies in the rule criteria identified below</p>	<p>Department addressed statutory factors by addressing rule criteria identified below</p>	<p>Not addressed in testimony; may be addressed in briefing</p>	<p>Not addressed in testimony; may be addressed in briefing</p>
<p>(4) promotional activities that may have given rise to the demand for this facility;</p>	<p>Ex. 9 (Application – Sections 2.3 and 7.5.1)</p>	<p>Department addressed statutory factors by addressing rule criteria identified below</p>	<p>Not addressed in testimony; may be addressed in briefing</p>	<p>Not addressed in testimony; may be addressed in briefing</p>
<p>(5) benefits of this facility including uses to protect or enhance environmental quality, and to increase reliability of energy supply in Minnesota and the region;</p>	<p>Ex. 18 (2013 Advanced Forecast Report)</p> <p>Ex. 19 (MISO Manitoba Hydro Wind Synergy Study)</p> <p>Ex. 20 (2013 Integrated Resource Plan)</p> <p>Ex. 21 (CIP Triennial Report)</p>	<p>Department addressed statutory factors by addressing rule criteria identified below</p>	<p>Not addressed in testimony; may be addressed in briefing</p>	<p>Not addressed in testimony; may be addressed in briefing</p>

Certificate of Need Statute and Rule Related Issues	MP	DOC-DER	LPI	RRANT
	<p>Ex. 23 (MISO Northern Area Study)</p> <p>Ex. 24 (Dorsey – Iron Range 500 kV Project Preliminary Stability Analysis)</p> <p>Exs. 25-28 (Manitoba – United States Transmission Development Wind Injection Study)</p> <p>Ex. 30 (MH – US TSR Sensitivity Analysis Draft Reports)</p> <p>Ex. 34, pp. 23-24 (McMillan Direct)</p> <p>Ex. 41, pp. 4-13 (Hoberg Direct)</p> <p>Ex. 42, p. 8 (Winter Direct)</p> <p>Ex. 43, pp. 4-33 and Schedule 1 (Rudeck Direct)</p> <p>Ex. 62 (Loop Flow Impact Study)</p>			

Certificate of Need Statute and Rule Related Issues	MP	DOC-DER	LPI	RRANT
(6) possible alternatives for satisfying the energy demand or transmission needs including but not limited to potential for increased efficiency and upgrading of existing energy generation and transmission facilities, load-management programs, and distributed generation;	Ex. 42, pp. 9-20 (Winter Direct) Ex. 43, pp. 29-33 (Rudeck Direct)	Department addressed statutory factors by addressing rule criteria identified below	Not addressed in testimony; may be addressed in briefing	Not addressed in testimony; may be addressed in briefing
(7) policies, rules, and regulations of other state and federal agencies and local governments;	Ex. 9 (Application – Sections 3.3, 3.4 and 3.5) Ex. 37, pp. 4-6 (Atkinson Direct)	Department addressed statutory factors by addressing rule criteria identified below	Not addressed in testimony; may be addressed in briefing	Not addressed in testimony; may be addressed in briefing
(8) any feasible combination of energy conservation improvements, required under section 216B.241, that can (i) replace part or all of the energy to be provided by the proposed facility, and (ii) compete with it economically;	Ex. 20 (2013 Integrated Resource Plan) Ex. 21 (CIP Triennial Report) Ex. 43, pp. 32-33 (Rudeck Direct)	Department addressed statutory factors by addressing rule criteria identified below	Not addressed in testimony; may be addressed in briefing	Not addressed in testimony; may be addressed in briefing
(9) with respect to a high-voltage transmission line, the benefits of enhanced regional reliability, access, or deliverability to the extent these factors improve the robustness of the transmission system or lower costs for electric consumers in Minnesota;	Ex. 19 (MISO Manitoba Hydro Wind Synergy Study) Ex. 23 (MISO Northern Area Study)	Ex. 53, at pp. 12-50 (Rakow Direct)	Not addressed in testimony; may be addressed in briefing	Not addressed in testimony; may be addressed in briefing

Certificate of Need Statute and Rule Related Issues	MP	DOC-DER	LPI	RRANT
	<p>Ex. 24 (Dorsey – Iron Range 500 kV Project Preliminary Stability Analysis)</p> <p>Exs. 25-28 (Manitoba – United States Transmission Development Wind Injection Study)</p> <p>Ex. 30 (MH – US TSR Sensitivity Analysis Draft Reports)</p> <p>Ex. 34, pp. 23-24 (McMillan Direct)</p> <p>Ex. 41, pp. 4-13 and Schedule 2 (Hoberg Direct)</p> <p>Ex. 42, p. 8 (Winter Direct)</p> <p>Ex. 43, pp. 4-33 and Schedule 1 (Rudeck Direct)</p> <p>Ex. 62 (Loop Flow Impact Study)</p>			

Certificate of Need Statute and Rule Related Issues	MP	DOC-DER	LPI	RRANT
(10) whether the applicant or applicants are in compliance with applicable provisions of sections 216B.1691 and 216B.2425, subdivision 7, and have filed or will file by a date certain an application for certificate of need under this section or for certification as a priority electric transmission project under section 216B.2425 for any transmission facilities or upgrades identified under section 216B.2425, subdivision 7;	Not applicable			
(11) whether the applicant has made the demonstrations required under subdivision 3a (regarding use of a renewable resource; and	Ex. 34, pp. 4-13 (McMillan Direct)	Department addressed statutory factors by addressing rule criteria identified below	Not addressed in testimony; may be addressed in briefing	Not addressed in testimony; may be addressed in briefing
(12) if the applicant is proposing a nonrenewable generating plant, the applicant's assessment of the risk of environmental costs and regulation on that proposed facility over the expected useful life of the plant, including a proposed means of allocating costs associated with that risk.	Not applicable			
3. <u>Has MP Met the Criteria Set Forth In Commission Rules Part 7849.0120 for the Granting of Such a Certificate?</u>	Yes	Yes	Not addressed in testimony; may be addressed in briefing	Not addressed in testimony; may be addressed in briefing

Certificate of Need Statute and Rule Related Issues	MP	DOC-DER	LPI	RRANT
<p>A. The probable result of denial would be an adverse effect upon the future adequacy, reliability, or efficiency of energy supply to the applicant, to the applicant's customers, or to the people of Minnesota and neighboring states considering:</p> <p>(1) the accuracy of the applicant's forecast of demand for the type of energy that would be supplied by the proposed facility;</p> <p>(2) the effects of the applicant's existing or expected conservation programs and state and federal conservation programs;</p> <p>(3) the effects of promotional practices of the applicant that may have given rise to the increase in the energy demand, particularly promotional practices which have occurred since 1974;</p> <p>(4) the ability of current facilities and planned facilities not requiring certificates of need to meet the future demand; and</p> <p>(5) the effect of the proposed facility, or a suitable modification thereof, in making efficient use of resources;</p>	<p>Ex. 18 (2013 Advanced Forecast Report)</p> <p>Ex. 19 (MISO Manitoba Hydro Wind Synergy Study)</p> <p>Ex. 20 (2013 Integrated Resource Plan)</p> <p>Ex. 21 (CIP Triennial Report)</p> <p>Ex. 23 (MISO Northern Area Study)</p> <p>Ex. 24 (Dorsey – Iron Range 500 kV Project Preliminary Stability Analysis)</p> <p>Exs. 25-28 (Manitoba – United States Transmission Development Wind Injection Study)</p> <p>Ex. 30 (MH – US TSR Sensitivity Analysis Draft Reports)</p> <p>Ex. 34, pp. 23-24 (McMillan Direct)</p>	<p>Ex. 52, pp. 3-13 (Shah Direct)</p> <p>Ex. 53, pp. 12-14, 20-21 (Rakow Direct)</p>	<p>Not addressed in testimony; may be addressed in briefing</p>	<p>Not addressed in testimony; may be addressed in briefing</p>

Certificate of Need Statute and Rule Related Issues	MP	DOC-DER	LPI	RRANT
	<p>Ex. 41, pp. 4-13 (Hoberg Direct)</p> <p>Ex. 42, p. 8 (Winter Direct)</p> <p>Ex. 43, pp. 4-33 and Schedule 1 (Rudeck Direct)</p> <p>Ex. 62 (Loop Flow Impact Study)</p>			
<p>B. A more reasonable and prudent alternative to the proposed facility has not been demonstrated by a preponderance of the evidence on the record, considering:</p> <p>(1) the appropriateness of the size, the type, and the timing of the proposed facility compared to those of reasonable alternatives;</p> <p>(2) the cost of the proposed facility and the cost of energy to be supplied by the proposed facility compared to the costs of reasonable alternatives and the cost of energy that would be supplied by reasonable alternatives;</p>	<p>Ex. 6 (DOC-EERA Environmental Report)³</p> <p>Ex. 17 (Environmental Data)</p> <p>Ex. 19 (MISO Manitoba Hydro Wind Synergy Study)</p> <p>Ex. 23 (MISO Northern Area Study)</p> <p>Ex. 24 (Dorsey – Iron Range 500 kV Project Preliminary Stability Analysis)</p>	<p>Ex. 53, pp. 15-49 (Rakow Direct)</p>	<p>With respect to B(2):</p> <p>Ex. 49, pp. 3-4, 6-8 (Kollen Direct)</p>	<p>Not addressed in testimony; may be addressed in briefing</p>

³ The Environmental Report (ER) was prepared by DOC-EERA, a non-party in this proceeding. Only MP took a position on the ER, with Mr. Atkinson testifying that it provided a fair assessment of the relevant issues in this matter. Ex. 37, p. 12.

Certificate of Need Statute and Rule Related Issues	MP	DOC-DER	LPI	RRANT
<p>(3) the effects of the proposed facility upon the natural and socioeconomic environments compared to the effects of reasonable alternatives; and</p> <p>(4) the expected reliability of the proposed facility compared to the expected reliability of reasonable alternatives;</p>	<p>Exs. 25-28 (Manitoba – United States Transmission Development Wind Injection Study)</p> <p>Ex. 29 (New Tie Line Loop Flow Impact Study)</p> <p>Ex. 30 (MH – US TSR Sensitivity Analysis Draft Reports)</p> <p>Ex. 32 (Section 5 of Route Permit Application)</p> <p>Ex. 34, pp. 19-21,24 (McMillan Direct)</p> <p>Ex. 37, pp. 7-12 (Atkinson Direct)</p> <p>Ex. 38, pp. 4-17 (Donahue Direct)</p> <p>Ex. 41, pp. 4-13 (Hoberg Direct)</p> <p>Ex. 42, pp. 9-19 (Winter Direct)</p>			

Certificate of Need Statute and Rule Related Issues	MP	DOC-DER	LPI	RRANT
<p>C. By a preponderance of the evidence on the record, the proposed facility, or a suitable modification of the facility, will provide benefits to society in a manner compatible with protecting the natural and socioeconomic environments, including human health; considering:</p> <p>(1) the relationship of the proposed facility, or a suitable modification thereof, to overall state energy needs;</p> <p>(2) the effects of the proposed facility, or a suitable modification thereof, upon the natural and socioeconomic environments compared to the effects of not building the facility;</p> <p>(3) the effects of the proposed facility, or a suitable modification thereof, in inducing future development; and</p> <p>(4) the socially beneficial uses of the output of the proposed facility, or a suitable modification thereof, including its uses to protect or enhance environmental quality; and</p>	<p>Ex. 6 (DOC-EERA Environmental Report)</p> <p>Ex. 17 (Environmental Data)</p> <p>Ex. 22 (Labovitz Study)</p> <p>Ex. 34, pp. 24-25 (McMillan Direct)</p> <p>Ex. 37, pp. 7-12 (Atkinson Direct)</p> <p>Ex. 38, pp. 17-18 (Donahue Direct)</p> <p>Ex. 42, pp. 4-6 (Winter Direct)</p> <p>Ex. 43, pp. 24-25 (Rudeck Direct)</p>	<p>Ex. 6 (DOC-EERA Environmental Report)</p> <p>Ex. 53, pp. 43-47 (Rakow Direct)</p>	<p>Not addressed in testimony; may be addressed in briefing</p>	<p>Not addressed in testimony; may be addressed in briefing</p>

Certificate of Need Statute and Rule Related Issues	MP	DOC-DER	LPI	RRANT
<p>D. The record does not demonstrate that the design, construction, or operation of the proposed facility, or a suitable modification of the facility, will fail to comply with relevant policies, rules, and regulations of other state and federal agencies and local governments.</p>	<p>Ex. 34, p. 26 (McMillan Direct)</p> <p>Ex. 37, pp. 4-6 (Atkinson Direct)</p>	<p>Not addressed in testimony; may be addressed in briefing</p>	<p>Not addressed in testimony; may be addressed in briefing</p>	<p>Not addressed in testimony; may be addressed in briefing</p>

LARGE POWER INTERVENOR ISSUES

Should the Following Conditions Be Attached to the Certificate of Need?	MP	DOC-DER	LPI	RRANT
<p>4. <u>Should the Commission require Commission Approval of the 133 MW Renewable Optimization Agreements and FERC Approval of the Facilities Construction Agreement?</u></p>	<p>Yes</p> <p>Ex. 35, pp. 9-10 (McMillan Direct)</p> <p>Ex. 45, pp. 2-3 (Rudeck Rebuttal)</p>	<p>Yes</p> <p>Ex. 55, pp. 1-2 (Rakow Rebuttal)</p>	<p>Yes</p> <p>Ex. 49, pp. 3, 13-14 (Kollen Direct)</p> <p>Ex. 51, pp. 6-7 (Kollen Surrebuttal)</p>	<p>Not addressed in testimony; may be addressed in briefing</p>
<p>5. <u>Should the Commission decide cost recovery issues as part of this proceeding?</u></p>	<p>No</p> <p>Ex. 35, pp. 10-18 (McMillan Rebuttal)</p> <p>Ex. 36, p. 3 (McMillan Surrebuttal)</p>	<p>No</p> <p>Ex. 55, p. 2-3 (Rakow Rebuttal);</p> <p>Ex. 56, 11-12 (Rakow Surrebuttal);</p> <p>Ex. 57, p. 4-14 (Johnson Surrebuttal)</p>	<p>Yes</p> <p>Ex. 51, pp. 4-6 (Kollen Surrebuttal)</p>	<p>Not addressed in testimony; may be addressed in briefing</p>
<p>a. <u>Should the Commission require AFUDC treatment rather than CWIP?</u></p>	<p>No</p> <p>Ex. 35, pp. 12-13 (McMillan Rebuttal)</p>	<p>No</p> <p>Ex. 57, pp. 4-9 (Johnson Surrebuttal)</p> <p>Tr. Vol. 2, pp. 68-75 (Johnson)</p>	<p>Yes</p> <p>Ex. 49, pp. 19-23 (Kollen Direct)</p> <p>Ex. 51, pp. 14-17 (Kollen Surrebuttal)</p>	<p>Not addressed in testimony; may be addressed in briefing</p>

Should the Following Conditions Be Attached to the Certificate of Need?	MP	DOC-DER	LPI	RRANT
b. <u>Should the Commission require rider recovery for the entirety of Minnesota Power’s cost recovery and prohibit recovery through base rates?</u>	No Ex. 35, pp. 13-14 (McMillan Rebuttal) Ex. 36, p. 3 (McMillan Surrebuttal)	No Ex. 57, pp. 9-11 (Johnson Surrebuttal)	Yes Ex. 49, pp. 23-25 (Kollen Direct) Ex. 51, pp. 17-18 (Kollen Surrebuttal)	Not addressed in testimony; may be addressed in briefing
c. <u>Should the Commission impose a “hard cap” on cost recovery?</u>	No Ex. 35, pp. 10-12 (McMillan Rebuttal) Ex. 36, p. 3 (McMillan Surrebuttal)	No Ex. 55, pp. 2-3 (Rakow Rebuttal) Ex. 56, pp. 10-11 (Rakow Surrebuttal) Tr. Vol. 2, p. 91-94 (Rakow)	Yes Ex. 49, pp. 5-13 (Kollen Direct) Ex. 51, pp. 8-14 (Kollen Surrebuttal)	Not addressed in testimony; may be addressed in briefing
d. <u>Should the Commission impose a “soft cap” on cost recovery?</u>	Yes Ex. 36, p. 3 (McMillan Surrebuttal)	Yes Ex. 55, pp. 2-3 (Rakow Rebuttal) Ex. 56, pp. 10-11 (Rakow Surrebuttal) Tr. Vol. 2, p. 91-94 (Rakow)	No. Ex. 51, pp. 8-14 (Kollen Surrebuttal)	Not addressed in testimony; may be addressed in briefing

Should the Following Conditions Be Attached to the Certificate of Need?	MP	DOC-DER	LPI	RRANT
6. <u>Should the Commission determine the allocation of costs of the Project to Minnesota Power's customer classes in this proceeding?</u>	No Ex. 35, pp. 15-18 (McMillan Rebuttal) Ex. 36, p. 3 (McMillan Surrebuttal)	No Ex. 56, pp. 11-14 (Johnson Surrebuttal)	Yes Ex. 51, pp. 4-6 (Kollen Surrebuttal)	Not addressed in testimony; may be addressed in briefing
a. <u>If so, should the Commission require the allocation of costs based on base revenues excluding fuel and other riders?</u>	No position Ex. 35, pp. 15-18 (McMillan Rebuttal)	Not addressed in testimony; may be addressed in briefing	Yes Ex. 49, p. 27 (Kollen Direct) Ex. 51, pp. 18-19 (Kollen Surrebuttal)	Not addressed in testimony; may be addressed in briefing