

November 25, 2014

Burl W. Haar
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, Minnesota 55101-2147

RE: **Supplemental Comments of the Minnesota Department of Commerce, Division of Energy Resources**
Docket No. G002/M-14-654

Dear Dr. Haar:

Attached are the *Supplemental Comments* of the Minnesota Department of Commerce, Division of Energy Resources (Department) in response to the *Supplemental Filing* submitted in the following matter:

Petition of Northern States Power Company (Xcel or the Company) for Approval of Changes in Contract Demand Entitlements.

The *Supplemental Filing* was filed on October 31, 2014. The petitioner on behalf of Xcel is:

Paul J. Lehman
Manager, Regulatory Compliance and Filings
Xcel Energy
414 Nicollet Mall - 7th Floor
Minneapolis, MN 55401

To ensure that the record is complete in this docket, the Department provides the following response to Xcel's October 31, 2014 *Supplemental Filing*. The Department recommends that the Commission accept the Company's proposed level of demand entitlement and allow Xcel to recover associated demand costs through the monthly Purchased Gas Adjustment (PGA) effective November 1, 2014.

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

Sincerely,

/s/ MICHAEL N. ZAJICEK
Rates Analyst

MNZ/lt
Attachment

BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

SUPPLEMENTAL COMMENTS OF THE
MINNESOTA DEPARTMENT OF COMMERCE
DIVISION OF ENERGY RESOURCES

DOCKET No. G002/M-14-654

I. BACKGROUND

Northern States Power Company (Xcel or the Company) filed a demand entitlement petition (*Petition*) on August 1, 2014 for the 2014-2015 heating season, with the Minnesota Public Utilities Commission (Commission). On September 2, 2014 the Minnesota Department of Commerce, Division of Energy Resources (Department) filed *Comments* in response to the Company's *Petition*. In its *Comments*, the Department supported the Company's *Petition* and recommended that the Commission approve the Company's proposed cost recovery and demand entitlement levels, subject to possible adjustment in the Company's November 1, 2013 supplemental filing.

On October 31, 2014, The Company filed its *Supplemental Filing* which shows the final demand entitlement volumes and costs that will be charged to ratepayers. The Company notes that there have been several changes to the firm transport entitlement levels since the original August 1, 2014 filing. The Department responds to the *Supplemental Filing* below.

II. THE DEPARTMENT'S ANALYSIS OF THE COMPANY'S SUPPLEMENTAL FILING

The Department's analysis of the Company's request includes a description and an evaluation of the Company's *Supplemental Filing*.

A. XCEL'S DEMAND ENTITLEMENT CHANGES

The Company's *Supplemental Filing* lists several changes to the demand entitlement levels and costs shown in the August 1, 2014 *Petition*. First, Xcel indicated that Viking Gas Transmission (Viking) is unable to supply the Company's planned purchase of 10,646 decatherms (Dth) per day of firm, winter-only capacity. To account for the lack of availability from Viking, Xcel purchased all available capacity of Northern Natural Gas (Northern) from Carlton, MN to Chisago, MN. This amounts to 5,629 Dth/day of capacity, at a cost of

\$286,000 more than the Viking capacity projected in the *Petition* due to Northern's higher reservation rates. To offset the remainder of the planned capacity purchase Xcel proposed to use its reserve capacity, reducing their reserve margin to 5.7 percent from a planned 6.3 percent reserve margin. This reserve margin is still within the Company's normal operating range.

Second, the Company also renewed some existing transportation and storage contracts with ANR Pipeline, ANR Storage, and Great Lakes Gas Transmission to enable Xcel to meet the Company's design day requirements. By extending the terms of service, costs were reduced by \$13,000 for this winter and by \$560,000 over the next three years when considering reservation and usage costs.

Finally, the Company noted that demand rates for Viking have increased, resulting in an annual cost increase of \$1,298,000.

The Department agrees that these changes are reasonable to serve firm customers on a peak day.

B. CHANGE IN XCEL'S RESERVE MARGIN

In Xcel's original *Petition* additional demand entitlements were required, and the most economical manner of doing this raised the reserve margin from 6.0 percent in 2013-2014 to 6.3 percent in 2014-2015. Due to the inability of Viking to provide the planned additional entitlements, the Company revised its reserve margin down to 5.7 percent for 2014-2015. Xcel stated that its proposed reserve margin of 47,639 Dth/day, of which 42,390 Dth/day is for the Minnesota jurisdiction, is appropriate to meet its design-day needs (DOC Attachment 1). Xcel's proposed reserve margin is within the 5-7 percent range that serves as a rule of thumb in deciding whether a given margin is reasonable. The Department, therefore, concludes that Xcel's proposed 2014-2015 reserve margin is reasonable.

C. HEDGING TRANSACTIONS

The Company updated its hedging transactions, showing that seven call options were executed for the 2014-2015 heating season, covering the Company's entire targeted supply quantity. The Department will not comment on these hedging transactions here, as our analysis will be included in a future Annual Automatic Adjustment Report.

D. XCEL'S PGA COST RECOVERY PROPOSAL UPDATE

Xcel proposed to reflect the costs associated with its proposed demand entitlements in the PGA effective November 1, 2014. The demand entitlements in Xcel's Trade Secret Revised Attachment 2, Schedule 1, Page 1 of 2, represent the demand entitlements for which the Company's firm customers will pay. Department Attachment 2 compares the October 2014 PGA costs to the anticipated November 2014 PGA costs for several customer classes (DOC Attachment 2). The resulting per-Dth cost changes related strictly to changes in demand costs have the following annual rate effects.

- Annual demand cost increase by \$0.0232/Dth, or approximately \$2.02 annually, for the average Residential customer consuming 87 Dth annually;
- Annual demand cost increase of \$0.0233/Dth, or approximately \$6.62 annually, for the average Small Commercial customer consuming 284 Dth annually;
- Annual demand cost increase of \$0.0227/Dth, or approximately \$33.20 annually, for the average Large Commercial customer consuming 1463 Dth annually; and
- No change in annual demand costs for the average Small Interruptible, Medium Interruptible, and Large Interruptible customers. These customer classes are not allocated demand costs under the current cost allocation plan.

The bill impacts described above relate solely to changes in demand cost and are based on the difference between demand data provided by the Company. Based on its review, the Department concludes that the Company's proposal appears to be reasonable.

III. THE DEPARTMENT'S RECOMMENDATIONS

The Department recommends that the Commission:

- Approve Xcel's proposed level of demand entitlements as amended by its *Supplemental Filing*; and
- Allow Xcel to recover associated demand costs through the monthly Purchased Gas Adjustment effective November 1, 2014.

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Docket No. G002/M-14-654
Demand Entitlement Analysis-Minneosta Jurisdiction
DOC Attachment 1

Northern States Power Company d/b/a Xcel Energy

Heating Season	Number of Firm Customers			Design-Day Requirement			Total Entitlement Plus Peak Shaving			Reserve Margin	
	(1) Number of Customers	(2) Change from Previous Year	(3) % Change From Previous Year	(4) Design Day (Dth)	(5) Change from Previous Year	(6) % Change From Previous Year	(7) Total Design-Day Capacity (Dth)	(8) Change from Previous Year	(9) % Change From Previous Year	(10) Reserve Margin	(11) % of Reserve [(7)-(4)]/(4)
2014-2015**	446,409	4,836	1.10%	715,945	9,010	1.27%	756,918	7,593	1.01%	40,973	5.72%
2013-2014**	441,573	2,363	0.54%	706,935	4,776	0.68%	749,325	4,078	0.55%	42,390	6.00%
2012-2013**	439,210	155	0.04%	702,159	(135)	-0.02%	745,247	153	0.02%	43,088	6.14%
2011-2012**	439,055	2,461	0.56%	702,294	2,683	0.38%	745,094	1,313	0.18%	42,800	6.09%
2010-2011**	436,594	2,896	0.67%	699,611	5,124	0.74%	743,781	(4,486)	-0.60%	44,170	6.31%
2009-2010**	433,698	4,846	1.13%	694,487	9,482	1.38%	748,267	15,976	2.18%	53,780	7.74%
2008-2009**	428,852	(2,651)	-0.61%	685,005	1,288	0.19%	732,291	10,785	1.49%	47,286	6.90%
2007-2008**	431,503	7,088	1.67%	683,717	5,984	0.88%	721,506	25,249	3.63%	37,789	5.53%
2006-2007	424,415	2,845	0.67%	677,733	6,887	1.03%	696,257	4,568	0.66%	18,524	2.73%
2005-2006	421,570	10,584	2.58%	670,846	21,191	3.26%	691,689	16,569	2.45%	20,843	3.11%
2004-2005	410,986	9,353	2.33%	649,655	46,187	7.65%	675,120	31,805	4.94%	25,465	3.92%
2003-2004	401,633	5,826	1.47%	603,468	(4,388)	-0.72%	643,315	1,040	0.16%	39,847	6.60%
2002-2003	395,807			607,856			642,275			34,419	5.66%
Average:			1.00%			1.41%			1.42%		5.56%

Firm Peak-Day Sendout

Heating Season	(12) Firm Peak-Day Sendout (Dth)	(13) Change from Previous Year	(14) % Change From Previous Year	(15) Excess per Customer [(7) - (4)]/(1)	(16) Design Day per Customer (4)/(1)	(17) Entitlement per Customer (7)/(1)	(18) Peak-Day Send per Customer (12)/(1)
2014-2015**	NA			0.0918	1.6038	1.6956	NA
2013-2014**	689,990	243	0.04%	0.0960	1.6009	1.6969	1.5626
2012-2013**	689,747	30,484	4.62%	0.0981	1.5987	1.6968	1.5704
2011-2012**	659,263	(16,314)	-2.41%	0.0975	1.5996	1.6970	1.5015
2010-2011	675,577	84,646	14.32%	0.1012	1.6024	1.7036	1.5474
2009-2010	590,931	(10,494)	-1.74%	0.1240	1.6013	1.7253	1.3625
2008-2009	601,425	15,551	2.65%	0.1103	1.5973	1.7076	1.4024
2007-2008	585,874	16,911	2.97%	0.0876	1.5845	1.6721	1.3578
2006-2007	568,963	31,303	5.82%	0.0436	1.5969	1.6405	1.3406
2005-2006	537,660	286	0.05%	0.0494	1.5913	1.6407	1.2754
2004-2005	537,374	(23,876)	-4.25%	0.0620	1.5807	1.6427	1.3075
2003-2004	561,250	26,865	5.03%	0.0992	1.5025	1.6017	1.3974
2002-2003	534,385			0.0870	1.5357	1.6227	1.3501
Average			2.71%	0.0880	1.5827	1.6706	1.4012

*-Some numbers may differ from Xcel Attachments due to rounding

** -Reflects the UPC DD method.

Demand Entitlement--PGA Cost Recovery Analysis
DOC Attachment 2

	Last Rate Case (G002/GR-09- 1153)	Last Approved Demand Change (G002/M-13- 663)	October PGA (10/1/14)	Nov 2013 PGAs with Proposed Demand Entitlement Changes	Change From Last Rate Case	Change From Last Approved Demand Change	Percent Change (%) From July PGA	Change (\$) From July PGA
Residential								
Commodity Cost of Gas (WACOG)	\$5.5042	\$3.7332	\$4.0675	\$4.4059	-19.95%	18.02%	8.32%	\$0.3384
Demand Cost of Gas (1)	\$0.9008	\$0.9347	\$0.8215	\$0.8447	-6.23%	-9.63%	2.82%	\$0.0232
Distribution Margin	\$1.8591	\$1.8591	\$1.8591	\$1.8591	0.00%	0.00%	0.00%	\$0.0000
Total per Dth Cost	\$8.2641	\$6.5270	\$6.7481	\$7.1097	-13.97%	8.93%	5.36%	\$0.3616
Average Annual Usage (Dk)	87	87	87	87				
Average Annual Total Cost	\$718.60	\$567.55	\$586.77	\$618.22	-13.97%	8.93%	5.36%	\$31.44
Average Annual Total Demand Cost of Gas	\$78.33	\$81.28	\$71.43	\$73.45			Current Allocation	\$2.02

	Last Rate Case (G002/GR-09- 1153)	Last Approved Demand Change (G002/M-13- 663)	October PGA (10/1/14)	Nov 2013 PGAs with Proposed Demand Entitlement Changes	Change From Last Rate Case	Change From Last Approved Demand Change	Percent Change (%) From July PGA	Change (\$) From July PGA
Small Commercial								
Commodity Cost of Gas (WACOG)	\$5.4871	\$3.7332	\$4.0675	\$4.4059	-19.70%	18.02%	8.32%	\$0.3384
Demand Cost of Gas (1)	\$0.8984	\$0.9323	\$0.8246	\$0.8479	-5.62%	-9.05%	2.83%	\$0.0233
Distribution Margin	\$1.2331	\$1.2331	\$1.2331	\$1.2331	0.00%	0.00%	0.00%	\$0.0000
Total per Dth Cost	\$7.6186	\$5.8986	\$6.1252	\$6.4869	-14.85%	9.97%	5.91%	\$0.3617
Average Annual Usage (Dk)	284	284	284	284				
Average Annual Total Cost	\$2,163.87	\$1,675.35	\$1,739.71	\$1,842.44	-14.85%	9.97%	5.91%	\$102.73
Average Annual Total Demand Cost of Gas	\$255.17	\$264.80	\$234.21	\$240.82			Current Allocation	\$6.62

	Last Rate Case (G002/GR-09- 1153)	Last Approved Demand Change (G002/M-13- 663)	October PGA (10/1/14)	Nov 2013 PGAs with Proposed Demand Entitlement Changes	Change From Last Rate Case	Change From Last Approved Demand Change	Percent Change (%) From July PGA	Change (\$) From July PGA
Large Commercial								
Commodity Cost of Gas (WACOG)	\$5.4871	\$3.7332	\$4.0675	\$4.4059	-19.70%	18.02%	8.32%	\$0.3384
Demand Cost of Gas (1)	\$0.8917	\$0.9116	\$0.8097	\$0.8324	-6.65%	-8.69%	2.80%	\$0.0227
Distribution Margin	\$1.2315	\$1.2315	\$1.2315	\$1.2315	0.00%	0.00%	0.00%	\$0.0000
Total per Dth Cost	\$7.6103	\$5.8763	\$6.1087	\$6.4698	-14.99%	10.10%	5.91%	\$0.3611
Average Annual Usage (Dk)	1,463	1,463	1,463	1,463				
Average Annual Total Cost	\$11,131.14	\$8,594.91	\$8,934.84	\$9,463.00	-14.99%	10.10%	5.91%	\$528.16
Average Annual Total Demand Cost of Gas	\$1,304.24	\$1,333.34	\$1,184.30	\$1,217.50			Current Allocation	\$33.20

	Last Rate Case (G002/GR-09- 1153)	Last Approved Demand Change (G002/M-13- 663)	October PGA (10/1/14)	Nov 2013 PGAs with Proposed Demand Entitlement Changes	Change From Last Rate Case	Change From Last Approved Demand Change	Percent Change (%) From July PGA	Change (\$) From July PGA
Small Interruptible								
Commodity Cost of Gas (WACOG)	\$5.4926	\$3.7332	\$4.0675	\$4.4059	-19.78%	18.02%	8.32%	\$0.3384
Demand Cost of Gas (1)	\$0.0000	\$0.0000	\$0.0000	\$0.0000	NA	NA	NA	\$0.0000
Distribution Margin	\$0.9635	\$0.9635	\$0.9635	\$0.9635	0.00%	0.00%	0.00%	\$0.0000
Total per Dth Cost	\$6.4561	\$4.6967	\$5.0310	\$5.3694	-16.83%	14.32%	6.73%	\$0.3384
Average Annual Usage (Dk)	7,936	7,936	7,936	7,936				
Average Annual Total Cost	\$51,235.93	\$37,273.01	\$39,926.33	\$42,611.88	-16.83%	14.32%	6.73%	\$2,685.54
Average Annual Total Demand Cost of Gas	\$0.00	\$0.00	\$0.00	\$0.00			Current Allocation	\$0.00

Demand Entitlement--PGA Cost Recovery Analysis

DOC Attachment 2

	Last Rate Case (G002/GR-09- 1153)	Last Approved Demand Change (G002/M-13- 663)	October PGA (10/1/14)	Nov 2013 PGAs with Proposed Demand Entitlement Changes	Change From Last Rate Case	Change From Last Approved Demand Change	Percent Change (%) From July PGA	Change (\$) From July PGA
Medium Interruptible								
Commodity Cost of Gas (WACOG)	\$5.4696	\$3.7332	\$4.0675	\$4.4059	-19.45%	18.02%	8.32%	\$0.3384
Demand Cost of Gas (1)	\$0.0000	\$0.0000	\$0.0000	\$0.0000	NA	NA	NA	\$0.0000
Distribution Margin	\$0.4751	\$0.4751	\$0.4751	\$0.4751	0.00%	0.00%	0.00%	\$0.0000
Total per Dth Cost	\$5.9447	\$4.2083	\$4.5426	\$4.8810	-17.89%	15.99%	7.45%	\$0.3384
Average Annual Usage (Dk)	64,709	64,709	64,709	64,709				
Average Annual Total Cost	\$384,676.89	\$272,314.88	\$293,948.40	\$315,845.92	-17.89%	15.99%	7.45%	\$21,897.53
Average Annual Total Demand Cost of Gas	\$0.00	\$0.00	\$0.00	\$0.00				Current Allocation \$0.00

	Last Rate Case (G002/GR-09- 1153)	Last Approved Demand Change (G002/M-13- 663)	October PGA (10/1/14)	Nov 2013 PGAs with Proposed Demand Entitlement Changes	Change From Last Rate Case	Change From Last Approved Demand Change	Percent Change (%) From July PGA	Change (\$) From July PGA
Large Interruptible								
Commodity Cost of Gas (WACOG)	\$5.5501	\$3.7332	\$4.0675	\$4.4059	-20.62%	18.02%	8.32%	FALSE
Demand Cost of Gas (1)	\$0.0000	\$0.0000	\$0.0000	\$0.0000	NA	NA	NA	\$0.0000
Distribution Margin	\$0.4346	\$0.4346	\$0.4346	\$0.4346	0.00%	0.00%	0.00%	\$0.0000
Total per Dth Cost	\$5.9847	\$4.1678	\$4.5021	\$4.8405	-19.12%	16.14%	7.52%	\$0.3384
Average Annual Usage (Dk)	745,979	745,979	745,979	745,979				
Average Annual Total Cost	\$4,464,438.14	\$3,109,091.28	\$3,358,479.52	\$3,610,918.81	-19.12%	16.14%	7.52%	\$252,439.29
Average Annual Total Demand Cost of Gas	\$0.00	\$0.00	\$0.00	\$0.00				Current Allocation \$0.00

(1) Does not include demand smoothing

(2) WACOG held constant to isolate price changes related solely to demand changes.

Current Allocation	Commodity	Commodity	Demand	Demand	Demand	Total	Total
Summary	Change	Change	Change	Change	Annual	Annual	Annual
Change from most recent PGA	Change	Change	Change	Change	Change	Change	Change
Customer Class	(\$/Dk)	(Percent)	(\$/Dk)	(Percent)	(\$/Dk)	(\$/Dk)	(Percent)
Residential	\$0.3384	8.32%	\$0.0232	2.82%	\$2.02	\$31.44	5.36%
Small Commercial	\$0.3384	8.32%	\$0.0233	2.83%	\$6.62	\$102.73	5.91%
Large Commercial	\$0.3384	8.32%	\$0.0227	2.80%	\$33.20	\$528.16	5.91%
Small Interruptible	\$0.3384	8.32%	\$0.0000	NA	\$0.00	\$2,685.54	6.73%
Medium Interruptible	\$0.3384	8.32%	\$0.0000	NA	\$0.00	\$21,897.53	7.45%
Large Interruptible	FALSE	8.32%	\$0.0000	NA	\$0.00	\$252,439.29	7.52%

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
Supplemental Comments**

Docket No. G002/M-14-654

Dated this 25th day of November 2014

/s/Sharon Ferguson

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Tamie A.	Aberle	tamie.aberle@mdu.com	Great Plains Natural Gas Co.	400 North Fourth Street Bismarck, ND 585014092	Electronic Service	No	OFF_SL_14-654_M-14-654
Christopher	Anderson	canderson@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022191	Electronic Service	No	OFF_SL_14-654_M-14-654
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_14-654_M-14-654
Kristine	Anderson	kanderson@greatermngas.com	Greater Minnesota Gas, Inc.	202 S. Main Street Le Sueur, MN 56058	Electronic Service	No	OFF_SL_14-654_M-14-654
Alison C	Archer	alison.c.archer@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 5 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_14-654_M-14-654
Gail	Baranko	gail.baranko@xcelenergy.com	Xcel Energy	414 Nicollet Mall 7th Floor Minneapolis, MN 55401	Electronic Service	No	OFF_SL_14-654_M-14-654
William A.	Blazar	bblazar@mnchamber.com	Minnesota Chamber Of Commerce	Suite 1500 400 Robert Street North St. Paul, MN 55101	Electronic Service	No	OFF_SL_14-654_M-14-654
Michael	Bradley	mike.bradley@lawmoss.com	Moss & Barnett	150 S. 5th Street, #1200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_14-654_M-14-654
Robert S.	Carney, Jr.			4232 Colfax Ave. S. Minneapolis, MN 55409	Paper Service	No	OFF_SL_14-654_M-14-654
George	Crocker	gwillc@nawo.org	North American Water Office	PO Box 174 Lake Elmo, MN 55042	Electronic Service	No	OFF_SL_14-654_M-14-654
Jeffrey A.	Daugherty	jeffrey.daugherty@centerpointenergy.com	CenterPoint Energy	800 LaSalle Ave Minneapolis, MN 55402	Electronic Service	No	OFF_SL_14-654_M-14-654

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Ian	Dobson	ian.dobson@ag.state.mn.us	Office of the Attorney General-RUD	Antitrust and Utilities Division 445 Minnesota Street, BRM Tower St. Paul, MN 55101	Electronic Service 1400	No	OFF_SL_14-654_M-14-654
Rebecca	Eilers	rebecca.d.eilers@xcelenergy.com	Xcel Energy	414 Nicollet Mall, 7th Floor Minneapolis, MN 55401	Electronic Service	No	OFF_SL_14-654_M-14-654
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_14-654_M-14-654
Edward	Garvey	garveyed@aol.com	Residence	32 Lawton St Saint Paul, MN 55102	Electronic Service	No	OFF_SL_14-654_M-14-654
Benjamin	Gerber	bgerber@mnychamber.com	Minnesota Chamber of Commerce	400 Robert Street North Suite 1500 St. Paul, Minnesota 55101	Electronic Service	No	OFF_SL_14-654_M-14-654
Todd J.	Guerrero	todd.guerrero@kutakrock.com	Kutak Rock LLP	Suite 1750 220 South Sixth Street Minneapolis, MN 554021425	Electronic Service	No	OFF_SL_14-654_M-14-654
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_14-654_M-14-654
Annete	Henkel	mui@mutilityinvestors.org	Minnesota Utility Investors	413 Wacouta Street #230 St. Paul, MN 55101	Electronic Service	No	OFF_SL_14-654_M-14-654
Sandra	Hofstetter	N/A	MN Chamber of Commerce	7261 County Road H Fremont, WI 54940-9317	Paper Service	No	OFF_SL_14-654_M-14-654
Michael	Hoppe	il23@mtn.org	Local Union 23, I.B.E.W.	932 Payne Avenue St. Paul, MN 55130	Electronic Service	No	OFF_SL_14-654_M-14-654

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Eric	Jensen	ejensen@iwla.org	Izaak Walton League of America	Suite 202 1619 Dayton Avenue St. Paul, MN 55104	Electronic Service	No	OFF_SL_14-654_M-14-654
Richard	Johnson	Rick.Johnson@lawmoss.com	Moss & Barnett	150 S. 5th Street Suite 1200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_14-654_M-14-654
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	OFF_SL_14-654_M-14-654
Michael	Krikava	mkrikava@briggs.com	Briggs And Morgan, P.A.	2200 IDS Center 80 S 8th St Minneapolis, MN 55402	Electronic Service	No	OFF_SL_14-654_M-14-654
Nicolle	Kupser	nkupser@greatermngas.com	Greater Minnesota Gas, Inc.	202 South Main Street P.O. Box 68 Le Sueur, MN 56058	Electronic Service	No	OFF_SL_14-654_M-14-654
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_14-654_M-14-654
Eric	Lipman	eric.lipman@state.mn.us	Office of Administrative Hearings	PO Box 64620 St. Paul, MN 551640620	Paper Service	Yes	OFF_SL_14-654_M-14-654
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