

**STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION**

**Nancy Lange
Dan Lipschultz
Matt Schuerger
Katie Sieben
John Tuma**

**Chair
Commissioner
Commissioner
Commissioner
Commissioner**

In the Matter of a Request for the Approval of the Asset Purchase and Sale Agreement Between Interstate Power and Light Company and Southern Minnesota Energy Cooperative

Docket Nos. E001, 115, 140, 105, 139, 124, 126, 145, 132, 114, 6521, 142, 134/PA-14-322

**AMENDED COMPLIANCE FILING BY
SOUTHERN MINNESOTA ENERGY
COOPERATIVE ON TRANSITION
PERIOD RATES**

INTRODUCTION AND BACKGROUND

On June 8, 2015, the Minnesota Public Utilities Commission (Commission) issued an Order¹ approving the joint petition submitted by Southern Minnesota Energy Cooperative (SMEC) and Interstate Power and Light Company (IPL) requesting approval of the sale of IPL’s Minnesota electric distribution system and assets, and the transfer of IPL’s Minnesota service rights and obligations, to SMEC, which is an electric cooperative association comprised of 12 rural electric cooperatives (Member Cooperatives).² The Commission’s approval of the sale and transfer of service rights from IPL to SMEC was subject to certain conditions, including the

¹ *In the Matter of a Request for the Approval of the Asset Purchase and Sale Agreement Between Interstate Power & Light Co. & S. Minn. Energy Coop.*, Order Approving Agreement Subject to Conditions, Docket Nos. E001, 115, 140, 105, 139, 124, 126, 145, 132, 114, 6521, 142, 135/PA-14-322 (June 8, 2015) (hereinafter, “June 8, 2015 Order”).

² SMEC’s Member Cooperatives include: BENCO Electric Cooperative, Brown County Rural Electrical Association, Federated Rural Electric Association, Freeborn-Mower Cooperative Services, Minnesota Valley Electric Cooperative, Nobles Cooperative Electric, People’s Energy Cooperative, Redwood Electric Cooperative, Sioux Valley Energy (of Colman, South Dakota), South Central Electric Association, Steele-Waseca Cooperative Electric, and MiEnergy Cooperative (formed in 2017 as a result of the merger between Hawkeye REC and Tri-County Electric Cooperative).

Commission’s retention of jurisdiction to enforce the terms and conditions of a 5-year rate plan³ (Rate Plan) agreed to by SMEC and IPL when they submitted the joint petition. As the Commission recognized in its June 8, 2015 Order, the agreed-upon Rate Plan “reasonably ensures that IPL customer rates will be maintained separately from existing SMEC customer rates until merging them is an appropriate regulatory outcome.”⁴

The Rate Plan provides that with certain limited exceptions, for the first thirty-six months after closing of the sale⁵ (Three-Year Initial Period), SMEC and its Member Cooperatives “will adopt IPL’s retail rates effective as of the date of Closing [of the sale and transfer], as approved by the Commission in Docket No. E-001/GR-10-276,” for members located in service territories acquired from IPL (Acquired Areas).⁶ Having complied with initial requirement for the Three-Year Initial Period, SMEC Member Cooperatives are now at the stage of establishing rates for the next twenty-four months after the closing (Two-Year Transition Period), which begins on August 1, 2018.

The Rate Plan sets guidelines governing the establishment of rates by each SMEC Member Cooperative for its respective Acquired Area. The purpose of this filing is to provide the Commission and interested parties with notice that SMEC and its Member Cooperatives have

³ *In the Matter of a Request for the Approval of the Asset Purchase and Sale Agreement Between Interstate Power & Light Co. & S. Minn. Energy Coop.*, Proposed SMEC Rate Plan, (Attachment G to Joint Petition), Docket Nos. E001, 115, 140, 105, 139, 124, 126, 145, 132, 114, 6521, 142, 135/PA-14-322 (April 15, 2014) (hereinafter, “Rate Plan”).

⁴ June 8, 2015 Order at 8.

⁵ The closing occurred on July 31, 2015. After the closing of the sale from IPL to SMEC, the Commission subsequently approved SMEC’s transfer of service rights of IPL’s former customers to the SMEC Member Cooperatives. See *In the Matter of Southern Minnesota Energy Cooperative’s Petition Requesting Approval to Adjust Electric Service Territories of the Twelve Member Cooperatives*, Order, Docket Nos. E-001, 132, 114, 104, 142, 135, 115, 140, 105, 139, 124, 126, 145/SA-15-986; E-001, 132, 114, 104, 142, 135, 115, 140, 105, 139, 124, 126, 145/PA-14-322 (Jan. 7, 2016).

⁶ Rate Plan, *supra* note 3 at 1.

complied with the terms of the Rate Plan with respect to the rates established by each Member Cooperative for the Two-Year Transition Period.

RATE PLAN REQUIREMENTS

For purposes of establishing Transition Period rates, the Rate Plan first provides as follows:

During the Initial Period, each SMEC Member Cooperative will prepare Class Cost of Service Studies (CCOSS) as part of developing a long range Rate Plan. The CCOSS will address the cost to serve 1) the Legacy Area,⁷ 2) the Acquired Area, and 3) the Combined Area. The CCOSS for each SMEC Member Cooperative's Legacy Area and Acquired Area will reflect the Acquired Area and Legacy Area specific direct assigned costs for purchased power and distribution facilities. Margin requirements will be determined in the same manner and using the same criteria for Acquired Areas and Legacy Areas. For example, if a SMEC Member Cooperative establishes its target margin on the basis of a Times Interest Earned Ratio (TIER) of 2.0, it will use that method and metric for both the Acquired Area and Legacy Area. Other costs common to both Acquired Areas and Legacy Areas,[] such as Customer Accounting, Customer Service and Information, Sales, A&G and fixed costs related to General Plant will be allocated to Acquired Areas and Legacy Areas and then to each rate class based on appropriate allocation factors in a non-discriminatory manner.⁸

Upon the completion of the foregoing CCOSS, the Rate Plan explains:

Based on the results of the CCOSS's, the SMEC Member Cooperatives will develop a plan to either 1) continue to serve the Acquired Areas and Legacy Areas under separate area cost based rate structures, or 2) merge the rates of the two areas over time in a manner that mitigates any undue hardship to customers, or 3) some combination thereof. Key to this determination will be the impact of the plan on the bills of the affected customers.⁹

With respect to the actual process for establishing Two-Year Transition Period rates, the Rate Plan goes on to state that “[d]uring the Transition Period, unless the criteria for merging the

⁷ “Legacy Areas” refer to those areas that the SMEC Member Cooperatives already served prior to the sale of assets and transfer of service territories from IPL.

⁸ Rate Plan, *supra* note 3 at 4.

⁹ *Id.* at 5.

area rates as outlined [herein] are met, each Member will maintain separate rate structures for the Legacy and Acquired Areas.¹⁰”

The Rate Plan provides that a Member Cooperative may only merge one or more Legacy Area and Acquired Area rates if: (1) “the projected revenue produced by the Legacy Area and Acquired Area rates in question are within 5 percent of each other;” and (2) “No rate will be increased by more than 5 percent per year, excluding the operation of the PCA mechanism,¹¹ to facilitate the merger of [the] rate[s].¹²”

If the foregoing criteria for merging rates are not met, the Rate Plan requires that “[e]ach Member Cooperative will maintain separate rates for its Acquired Area and Legacy Area[.]¹³” This requirement is confirmed by the Commission’s June 8, 2015 Order, which provides, “Rates not merged in accordance with [the Rate Plan] limitations will be maintained separately and established according to the results of the CCOSS.¹⁴” Under such circumstances, “[t]he rates for the Acquired Area will be designed to recover, in total, the sum of the class revenue requirements for the Acquired Area, as determined by the CCOSS¹⁵” The Rate Plan

¹⁰ *Id.*

¹¹ “PCA mechanism” refers to a Power Cost Adjustment mechanism “designed to track changes in the cost of purchased power and transmission delivery service from the amount included in IPL’s current base rates and the Renewable Energy Recovery (RER) surcharge.” *Id.* at 1.

¹² *Id.* at 5-6; *see also* June 8, 2015 Order at 4 (“In the two-year transition period, the cooperatives will determine whether to merge existing and acquired customer rates, however, the Joint Petitioners have agreed that no rate will be increased by more than 5 percent per year (excluding the operation of the Power Cost Adjustment (PCA) mechanism) to facilitate the merger of a Legacy Area and Acquired Area rate.”)

¹³ Rate Plan, *supra* note 3 at 5.

¹⁴ June 8, 2015 Order at 5.

¹⁵ Rate Plan, *supra* note 3 at 5.

explains that “[t]he same approach will be used for the Legacy Area, with the total revenue requirements of the Acquired Area and Legacy Area being kept separate.¹⁶”

CCOSS METHODOLOGY

SMEC retained the National Rural Utilities Cooperative Finance Corporation (CFC) on behalf of its Member Cooperatives to complete the CCOSS required under the Rate Plan using 2016 as the test year. CFC completed two CCOSS scenarios for each Member Cooperative. Under the first scenario, CFC linked two cost studies, one for each cooperative’s Legacy Area and one for its Acquired Area, to simulate a single study that allocated all costs equally between both areas using non-discriminatory factors (i.e., a CCOSS for the overall “Combined Area”). The purpose of this first study was to give the Member Cooperatives a better sense of what adjustments will need to be made when each cooperative determines it is appropriate to begin merging the rates of both areas.

In the second scenario, CFC again linked two cost studies for the Legacy and Acquired Areas of each cooperative. This time, however, CFC directly assigned the costs for purchased power and distribution facilities¹⁷ attributable to each respective area as described in the Rate Plan. Other costs¹⁸ common to both areas were allocated between the two areas and then to each rate class using non-discriminatory allocation factors. This second scenario provides each cooperative with the information necessary to determine rates during the Two-Year Transition Period that are designed to recover the sum of the class revenue requirements for each respective area independent of one another (i.e., maintaining separate, cost-based rate structures for the Legacy and Acquired Areas).

¹⁶ *Id.*

¹⁷ Acquired plant sold to others was removed. Acquired area acquisition premium directly assigned.

¹⁸ Costs assigned directly to Legacy area were legacy generation and transmission costs, Deferred Credits and adjusted legacy known purchased power costs.

CCOSS RESULTS

Although Member Cooperatives had some individual rates that met the criteria for merging Legacy and Acquired Area rates as outlined in the Rate Plan (i.e., the projected revenue from each area was within 5% of one another and no rate would need to be increased by more than 5% to facilitate the merger), the majority of the Member Cooperatives' rates did not satisfy the criteria for merging. Accordingly, the SMEC Member Cooperatives have all determined it is in the best interest of their respective cooperatives' members to maintain separate cost-based rate structures for the Legacy and Acquired Areas across all classes for the duration of the Two-Year Transition Period. As a result, the SMEC Member Cooperatives have relied on the second scenario results of the CCOSS completed by CFC, which specifically allocate the costs for purchased power and distribution facilities attributable to the Legacy Areas and Acquired Areas separately, as outlined in the Rate Plan.

The following table summarizes the overall annual percentage increase (or decrease) in rates that each Member Cooperative would need to implement in order to recover the sum of the class revenue requirements for each area for the given test year based on the results of the second scenario CCOSS:

Scenario 2: Specific Assignment of Purchased Power & Distribution Costs		
Cooperative	Legacy Area	Acquired Area
BENCO	-2.39%	9.88%
Brown	-0.13%	3.89%
Federated	-0.13%	21.42%
Freeborn Mower	-4.94%	8.82%
Minnesota Valley	2.83%	20.47%
Nobles	-1.67%	10.19%
Peoples	5.81%	1.06%
Redwood	1.04%	17.67%
Sioux Valley	-0.49%	24.90%
South Central	0.11%	18.61%
Steele-Waseca	-1.15%	13.80%
MiEnergy	1.22%	15.97%

As the results in the foregoing table reflect, there was a wide variation in the results of the CCOSS among the Member Cooperatives for the Acquired Areas. The higher percentages reflected in the Acquired Area results for some of the cooperatives are a natural consequence of several factors, including but not limited to the following: (1) former IPL members located in the Acquired Areas have essentially not seen any increase in rates since IPL's last rate case in 2010; (2) the cooperatives with higher percentages needed to recover the revenue requirements for the Acquired Areas generally also acquired a larger percentage of IPL's distribution assets (and correspondingly incurred the expenses associated with such asset acquisitions), and (3) significant differences in load factors among the cooperatives.

TRANSITION PERIOD RATES

Although the results of the CCOSS reflect the need for many of the Member Cooperatives to make significant adjustments to rates in their Acquired Areas in order to fully recover the class revenue requirements needed to serve members in those areas, the SMEC Member Cooperatives have proceeded with the development of Transition Period rates with member impact at the forefront of their considerations. Even though the Rate Plan places no cap on rate increases for the Acquired Areas in the event the cooperatives are maintaining separate rate structures during the Two-Year Transition Period, all of the SMEC Member Cooperatives have agreed to use the 5% cap identified in the Rate Plan for merged rates as a ceiling for purposes of developing the Transition Period rates for their respective Acquired Areas in order to provide economic protections to affected customers and protect against rate shock. Accordingly, all of the SMEC Cooperatives will increase the overall rates for the Acquired Areas within a

range of 0% to 5% per year for the two-year Transition Period,¹⁹ as reflected in the following table:

Overall Rate Increases by Transition Period Year for the Acquired Areas

Cooperative	Year 1	Year 2
BENCO	Up to 5.00%	Up to 5.00%
Brown	Up to 3.89%	Up to 3.89%
Federated	Up to 5.00%	Up to 5.00%
Freeborn Mower	Up to 5.00%	Up to 5.00%
Minnesota Valley	Up to 5.00%	Up to 5.00%
Nobles	Up to 5.00%	Up to 5.00%
Peoples	Up to 1.06%	Up to 1.06%
Redwood	Up to 5.00%	Up to 5.00%
Sioux Valley	Up to 2.50%	Up to 5.00%
South Central	Up to 5.00%	Up to 5.00%
Steele-Waseca	Up to 1.00%	Up to 1.00%
MiEnergy	Up to 5.00%	Up to 5.00%

CONCLUSION

As outlined herein, SMEC and its Member Cooperatives have complied with the terms of the Rate Plan with respect to the development of CCROSS and the establishment of rates for the Two-Year Transition Period. The 12 SMEC Member Cooperatives intend to implement rate changes reflecting the overall rate adjustments for the Acquired Areas described herein when the Two-Year Transition Period commences on August 1, 2018.

¹⁹ SMEC notes that these overall percentage rate increases will be spread across all rate classes within the Acquired Areas based on appropriate allocation factors, as determined by each cooperative’s board. Individual members will be affected differently because the actual changes in rates seen by members within different rate classes will not be uniform. SMEC further notes that the 0-5% range does not factor in the expiration of the \$0.002/kWh credit provided to Acquired Area members “[i]n order to temper the increase resulting from the conversion from IPL’s ESCR mechanism . . . to the SMEC PCA mechanism,” which expires at the end of the Three-Year Initial Period. See Rate Plan, *supra* note 3 at 3-4.

Dated: January 9, 2018

FELHABER LARSON

By: /s/ Sara G. McGrane

Sara G. McGrane, #233213

Randi J. Winter, #391354

220 South Sixth Street, Suite 2200

Minneapolis, MN 55402

(612) 339-6321

smcgrane@felhaber.com

rwinter@felhaber.com

Attorneys for Southern Minnesota Energy Cooperative

CERTIFICATE OF SERVICE

I, Sara G. McGrane, hereby certify that I have this day, served true and correct copies of the following documents to all persons at the addresses indicated on the attached service list by electronic filing, electronic mail, courier, interoffice mail, or by depositing the same enveloped with postage paid in the United States mail at Minneapolis, Minnesota.

1. Amended Compliance Filing by Southern Minnesota Energy Cooperative on Transition Period Rates

Dated this 9th day of January, 2018.

/s/ Sara G. McGrane

FELHABER LARSON

220 South Sixth Street, Suite 2200

Minneapolis, MN 55402

(612) 339-6321

smcgrane@felhaber.com

Attorney for Southern Minnesota Energy Cooperative

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Michael	Allen	michael.allen@allenergysolar.com	All Energy Solar	721 W 26th st Suite 211 Minneapolis, Minnesota 55405	Electronic Service	No	OFF_SL_14-322_Official
Christopher	Anderson	canderson@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022191	Electronic Service	No	OFF_SL_14-322_Official
Mara	Ascheman	mara.k.ascheman@xcenergy.com	Xcel Energy	414 Nicollet Mall Fl 5 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_14-322_Official
John	Aune	johna@bluehorizonsolar.com	Blue Horizon Energy	171 Cheshire Ln Ste 500 Plymouth, MN 55441	Electronic Service	No	OFF_SL_14-322_Official
Rebecca J.	Baldwin	N/A	Spiegel & McDiarmid	1875 Eye St NW Ste 700 Washington, DC 20006	Paper Service	No	OFF_SL_14-322_Official
Rick	Bartz	rbartz@ibewlocal949.org	IBEW Local Union 949	12908 Nicollet Avenue South Burnsville, MN 55337	Electronic Service	No	OFF_SL_14-322_Official
Peter	Beithon	pbeithon@otpc.com	Otter Tail Power Company	P.O. Box 496 215 South Cascade Street Fergus Falls, MN 565380496	Electronic Service	No	OFF_SL_14-322_Official
Sara	Bergan	sebergan@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_14-322_Official
James J.	Bertrand	james.bertrand@stinson.com	Stinson Leonard Street LLP	50 S 6th St Ste 2600 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_14-322_Official
William	Black	bblack@mmua.org	MMUA	Suite 400 3025 Harbor Lane North Plymouth, MN 554475142	Electronic Service	No	OFF_SL_14-322_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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_14-322_Official
Kathleen M.	Brennan	kmb@mcgrannshea.com	McGrann Shea Carnival, Straughn & Lamb, Chartered	800 Nicollet Mall Ste 2600 Minneapolis, MN 554027035	Electronic Service	No	OFF_SL_14-322_Official
B. Andrew	Brown	brown.andrew@dorsey.com	Dorsey & Whitney LLP	Suite 1500 50 South Sixth Street Minneapolis, MN 554021498	Electronic Service	No	OFF_SL_14-322_Official
Michael J.	Bull	mbull@mncee.org	Center for Energy and Environment	212 Third Ave N Ste 560 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_14-322_Official
Richard	Burud	rgburud@msn.com	Southern Minnesota Energy Cooperative	31110 Cooperative Way Rushford, MN 55971	Electronic Service	No	OFF_SL_14-322_Official
Steve W.	Chriss	Stephen.chriss@walmart.com	Wal-Mart	2001 SE 10th St. Bentonville, AR 72716-5530	Electronic Service	No	OFF_SL_14-322_Official
Randy	Cirksena	N/A	Albert Lea - Freeborn County	Chamber of Commerce 1725 W Main St Albert Lea, MN 56007	Paper Service	No	OFF_SL_14-322_Official
City	Clerk	sschulte@ci.albertlea.mn.us	City of Albert Lea	221 E Clark St Albert Lea, MN 56007	Electronic Service	No	OFF_SL_14-322_Official
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_14-322_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Joan	Conrad	N/A	Iowa Utilities Board	1375 E. Court Ave Room 69 Des Moines, IA 50319-0069	Paper Service	No	OFF_SL_14-322_Official
Carl	Cronin	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_14-322_Official
Lisa	Crum	lisa.crum@ag.state.mn.us	Office of the Attorney General-PUC	445 Minnesota Street, 1100 BRM Saint Paul, MN 55101	Electronic Service	No	OFF_SL_14-322_Official
Lisa	Daniels	lisadaniels@windustry.org	Windustry	201 Ridgewood Ave Minneapolis, MN 55403	Electronic Service	No	OFF_SL_14-322_Official
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_14-322_Official
Steve	Downer	sdowner@mmua.org	MMUA	3025 Harbor Ln N Ste 400 Plymouth, MN 554475142	Electronic Service	No	OFF_SL_14-322_Official
Betsy	Engelking	betsy@geronimoenergy.com	Geronimo Energy	7650 Edinborough Way Suite 725 Edina, MN 55435	Electronic Service	No	OFF_SL_14-322_Official
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_14-322_Official
Nathan	Franzen	nathan@geronimoenergy.com	Geronimo Energy	7650 Edinborough Way Suite 725 Edina, MN 55435	Electronic Service	No	OFF_SL_14-322_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Doug	Franzen	djf@franzen-mn.com	Franzen & Associates, LLC	1675 Highland Pkwy St. Paul, MN 55116	Electronic Service	No	OFF_SL_14-322_Official
Bruce	Gerhardson	bgerhardson@otpc.com	Otter Tail Power Company	PO Box 496 215 S Cascade St Fergus Falls, MN 565380496	Electronic Service	No	OFF_SL_14-322_Official
Bill	Grant	Bill.Grant@state.mn.us	Minnesota Department of Commerce	85 7th Place East, Suite 500 St. Paul, MN 55101	Electronic Service	No	OFF_SL_14-322_Official
David	Grover	dgrover@itctransco.com	ITC Midwest	901 Marquette Avenue Suite 1950 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_14-322_Official
Tony	Hainault	anthony.hainault@co.henn epin.mn.us	Hennepin County DES	701 4th Ave S Ste 700 Minneapolis, MN 55415-1842	Electronic Service	No	OFF_SL_14-322_Official
J Drake	Hamilton	hamilton@fresh-energy.org	Fresh Energy	408 St Peter St Saint Paul, MN 55101	Electronic Service	No	OFF_SL_14-322_Official
Sam	Hanson	shanson@briggs.com	Briggs And Morgan, P.A.	2200 IDS Center 80 South Eighth Street Minneapolis, MN 55402	Electronic Service	No	OFF_SL_14-322_Official
Jack	Hays	jack.hays@westwoodps.co m	Westwood Professional Services	7699 Anagram Drive Eden Prairie, MN 55344	Electronic Service	No	OFF_SL_14-322_Official
Brandon	Heath	bheath@misoenergy.org	MISO Energy	2985 Ames Crossing Rd Eagan, MN 55121	Electronic Service	No	OFF_SL_14-322_Official
Kimberly	Hellwig	kimberly.hellwig@stoel.co m	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_14-322_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Annete	Henkel	mui@mnuutilityinvestors.org	Minnesota Utility Investors	413 Wacouta Street #230 St.Paul, MN 55101	Electronic Service	No	OFF_SL_14-322_Official
Richard J.	Hettwer	rj.hettwer@smmpa.org	SMMPA	500 First Avenue, SW Rochester, MN 559023303	Electronic Service	No	OFF_SL_14-322_Official
Holly	Hinman	holly.r.hinman@xcelenergy.com	Xcel Energy	414 Nicollet Mall, 7th Floor Minneapolis, MN 55401	Electronic Service	No	OFF_SL_14-322_Official
John	Hole	jhole@misoenergy.org	MISO	2985 Ames Crossing Rd Eagan, MN 55121	Electronic Service	No	OFF_SL_14-322_Official
Anne	Hunt	anne.hunt@ci.stpaul.mn.us	City of St. Paul	390 City Hall 15 West Kellogg Boulevard Saint Paul, MN 55102	Electronic Service	No	OFF_SL_14-322_Official
Dwight	Jelle	dkjelle@gmail.com	Best Power International, LLC	P.O. 5126 Hopkins, MN 55343	Electronic Service	No	OFF_SL_14-322_Official
Alan	Jenkins	aj@jenkinsatlaw.com	Jenkins at Law	2265 Roswell Road Suite 100 Marietta, GA 30062	Electronic Service	No	OFF_SL_14-322_Official
Linda	Jensen	linda.s.jensen@ag.state.mn.us	Office of the Attorney General-DOC	1800 BRM Tower 445 Minnesota Street St. Paul, MN 551012134	Electronic Service	No	OFF_SL_14-322_Official
Richard	Johnson	Rick.Johnson@lawmoss.com	Moss & Barnett	150 S. 5th Street Suite 1200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_14-322_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Elizabeth M.	Jones	elizabeth.jones@ag.state.mn.us	Office of the Attorney General-PUC	445 Minnesota Street Suite 1100 Bremer Tower St. Paul, MN 55101	Electronic Service	No	OFF_SL_14-322_Official
Brian	Krambeer	bkrambeer@tec.coop	Tri-County Electric Cooperative	PO Box 626 31110 Cooperative Way Rushford, MN 55971	Electronic Service	No	OFF_SL_14-322_Official
Jon	Kramer	sundialjon@gmail.com	Sundial Solar	3209 W 76th St Edina, MN 55435	Electronic Service	No	OFF_SL_14-322_Official
Jim	Krueger	jkrueger@fmcs.coop	Freeborn-Mower Cooperative Services	Box 611 Albert Lea, MN 56007	Electronic Service	No	OFF_SL_14-322_Official
Allen	Krug	allen.krug@xcelenergy.com	Xcel Energy	414 Nicollet Mall-7th fl Minneapolis, MN 55401	Electronic Service	No	OFF_SL_14-322_Official
Jeffrey L.	Landsman	jlandsman@wheelerlaw.com	Wheeler, Van Sickle & Anderson, S.C.	44 E. Mifflin Street, 10th Floor Madison, WI 53703	Electronic Service	No	OFF_SL_14-322_Official
Bob	Long	rlong@larkinhoffman.com	Larkin Hoffman (Silicon Energy)	1500 Wells Fargo Plaza 7900 Xerxes Ave S Bloomington, MN 55431	Electronic Service	No	OFF_SL_14-322_Official
Paula	Maccabee	Pmaccabee@justchangela.w.com	Just Change Law Offices	1961 Selby Ave Saint Paul, MN 55104	Electronic Service	No	OFF_SL_14-322_Official
Erik	Madsen	ErikMadsen@alliantenergy.com	Alliant Energy	200 First St SE Cedar Rapid, IA 52401	Electronic Service	No	OFF_SL_14-322_Official
Kavita	Maini	kmains@wi.rr.com	KM Energy Consulting LLC	961 N Lost Woods Rd Oconomowoc, WI 53066	Electronic Service	No	OFF_SL_14-322_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Pam	Marshall	pam@energycents.org	Energy CENTS Coalition	823 7th St E St. Paul, MN 55106	Electronic Service	No	OFF_SL_14-322_Official
Natalie	McIntire	natalie.mcintire@gmail.com	Wind on the Wires	570 Asbury St Ste 201 Saint Paul, MN 55104-1850	Electronic Service	No	OFF_SL_14-322_Official
Brian	Meloy	brian.meloy@stinson.com	Stinson, Leonard, Street LLP	50 S 6th St Ste 2600 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_14-322_Official
Gregory R.	Merz	gregory.merz@gpmlaw.com	Gray, Plant, Mooty	80 S 8th St Ste 500 Minneapolis, MN 55402-5383	Electronic Service	No	OFF_SL_14-322_Official
Rob	Miller	N/A	Rochester Area Chamber of Commerce	220 S Broadway Ste 100 Rochester, MN 55904	Paper Service	No	OFF_SL_14-322_Official
James	Miller	N/A	League Of MN Cities	145 University Avenue West 3rd Floor St. Paul, MN 551032044	Paper Service	No	OFF_SL_14-322_Official
Herbert	Minke	hminke@allete.com	Minnesota Power	30 W Superior St Duluth, MN 55802	Electronic Service	No	OFF_SL_14-322_Official
David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022093	Electronic Service	No	OFF_SL_14-322_Official
Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP	33 South Sixth St Ste 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_14-322_Official
Martin	Morud	mmorud@trunorthsolar.com	Tru North Solar	5115 45th Ave S Minneapolis, MN 55417	Electronic Service	No	OFF_SL_14-322_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Carl	Nelson	cnelson@mncee.org	Center for Energy and Environment	212 3rd Ave N Ste 560 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_14-322_Official
Michael	Noble	noble@fresh-energy.org	Fresh Energy	Hamm Bldg., Suite 220 408 St. Peter Street St. Paul, MN 55102	Electronic Service	No	OFF_SL_14-322_Official
Rolf	Nordstrom	rnordstrom@gpisd.net	Great Plains Institute	2801 21ST AVE S STE 220 Minneapolis, MN 55407-1229	Electronic Service	No	OFF_SL_14-322_Official
Samantha	Norris	samanthanorris@alliantenergy.com	Interstate Power and Light Company	200 1st Street SE PO Box 351 Cedar Rapids, IA 524060351	Electronic Service	No	OFF_SL_14-322_Official
Donna	Pickard	dpickardgsss@gmail.com	Genie Solar Support Services	1215 Lilac Lane Excelsior, MN 55331	Electronic Service	No	OFF_SL_14-322_Official
David E.	Pomper	N/A	Spiegel & McDiarmid	1875 Eye St NW Ste 700 Washington, DC 20006	Paper Service	No	OFF_SL_14-322_Official
Benjamin L.	Porath	blp@dairy.net	Dairyland Power Cooperative	3200 E Ave S PO Box 817 La Crosse, WI 546020817	Electronic Service	No	OFF_SL_14-322_Official
Gayle	Prest	gayle.prest@minneapolismn.gov	City of Mpls Sustainability	350 South 5th St, #315 Minneapolis, MN 55415	Electronic Service	No	OFF_SL_14-322_Official
Enio	Ricci	ericci@invenergyllc.com	Invenergy LLC	17830 New Hampshire Ave Ste 300 Ashton, MD 20861	Electronic Service	No	OFF_SL_14-322_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Richard	Savelkoul	rsavelkoul@martinsquires.com	Martin & Squires, P.A.	332 Minnesota Street Ste W2750 St. Paul, MN 55101	Electronic Service	No	OFF_SL_14-322_Official
Kevin	Saville	kevin.saville@fr.com	Citizens/Frontier Communications	2378 Wilshire Blvd. Mound, MN 55364	Electronic Service	No	OFF_SL_14-322_Official
Larry L.	Schedin	Larry@LLSResources.com	LLS Resources, LLC	332 Minnesota St, Ste W1390 St. Paul, MN 55101	Electronic Service	No	OFF_SL_14-322_Official
Michael J.	Sevcik	N/A	City of Amboy	244 E Maine Street PO Box 250 Amboy, MN 56010	Paper Service	No	OFF_SL_14-322_Official
Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates	Ste 122 9100 W Bloomington Frwy Bloomington, MN 55431	Electronic Service	No	OFF_SL_14-322_Official
David	Shaffer	shaff081@gmail.com	Minnesota Solar Energy Industries Project	1005 Fairmount Ave Saint Paul, MN 55105	Electronic Service	No	OFF_SL_14-322_Official
Gary	Shaver	gshaver@silicon-energy.com	Silicon Energy	3506 124th St NE Marysville, WA 98271	Electronic Service	No	OFF_SL_14-322_Official
Erin	Shea	eshea@silicon-energy.com	Silicon Energy	PO Box 376 8787 Silicon Way Mt Iron, MN 55768	Electronic Service	No	OFF_SL_14-322_Official
Doug	Shoemaker	dougs@mnRenewables.org	MRES	2928 5th Ave S Minneapolis, MN 55408	Electronic Service	No	OFF_SL_14-322_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Joshua	Smith	joshua.smith@sierraclub.org		85 Second St FL 2 San Francisco, California 94105	Electronic Service	No	OFF_SL_14-322_Official
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_14-322_Official
Donna	Stephenson	dstephenson@greenergy.com	Great River Energy	12300 Elm Creek Boulevard Maple Grove, MN 55369	Electronic Service	No	OFF_SL_14-322_Official
James M.	Strommen	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered	470 U.S. Bank Plaza 200 South Sixth Street Minneapolis, MN 55402	Electronic Service	No	OFF_SL_14-322_Official
JoAnn	Thompson	jthompson@otpc.com	Otter Tail Power Company	P.O. Box 496 215 South Cascade Street Fergus Falls, MN 565380496	Electronic Service	No	OFF_SL_14-322_Official
Stephen J.	Videto	svideto@itctransco.com	ITC Holding Corp.	27175 Energy Way, Fifth Floor Novi, MI 48377	Electronic Service	No	OFF_SL_14-322_Official
Denis R.	Vogel	BADEMAIL-vmele@wheelerlaw.com	Wheeler, Van Sickle & Anderson, S.C.	44 E. Mifflin Street, 10th Floor Madison, WI 53703	Paper Service	No	OFF_SL_14-322_Official
Elizabeth	Wefel	eawefel@fhaherty-hood.com	Missouri River Energy Services	3724 W Avera Drive PO Box 88920 Sioux Falls, SD 57109-8920	Electronic Service	No	OFF_SL_14-322_Official
Cam	Winton	cwinton@mnchamber.com	Minnesota Chamber of Commerce	400 Robert Street North Suite 1500 St. Paul, Minnesota 55101	Electronic Service	No	OFF_SL_14-322_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Robyn	Woeste	robynwoeste@alliantenergy.com	Interstate Power and Light Company	200 First St SE Cedar Rapids, IA 52401	Electronic Service	No	OFF_SL_14-322_Official
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_14-322_Official
Christopher	Zibart	czibart@atcllc.com	American Transmission Company LLC	W234 N2000 Ridgeview Pkwy Court Waukesha, WI 53188-1022	Electronic Service	No	OFF_SL_14-322_Official