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September 14, 2020



Will Seuffert  
Executive Secretary  
Minnesota Public Utilities Commission  
121 7<sup>th</sup> Place East, Suite 350  
St. Paul, MN 55101-2147

**RE: In the Matter of the Petition of Otter Tail Power Company for Approval of a  
Transmission Cost Recovery Rider Annual Adjustment  
Docket No. E017/M-18-748  
REPLY COMMENTS**

Dear Mr. Seuffert:

Otter Tail Power Company (Otter Tail) hereby submits to the Minnesota Public Utilities Commission its Reply Comments in the above described matter.

Otter Tail electronically filed this document with the Commission which, in compliance with Minn. Rule 7829.1300, Subp. 2, also constitutes service on the Department of Commerce, Division of Energy Resources and the Office of Attorney General-Antitrust & Utilities Division.

If you have any questions regarding this filing, please contact me at 218-739-8956 or at [cstephenson@otpc.com](mailto:cstephenson@otpc.com). A Certificate of Service is enclosed.

Sincerely,

*/S/ CARY STEPHENSON*  
Cary Stephenson  
Associate General Counsel

*/S/ BRUCE GERHARDSON*  
Bruce Gerhardsen  
Vice President, Regulatory Affairs

kaw  
Enclosures  
By electronic filing  
c: Service List

STATE OF MINNESOTA  
BEFORE THE  
MINNESOTA PUBLIC UTILITIES COMMISSION

In the Matter of the Petition of Otter Tail  
Power Company for Approval of a  
Transmission Cost Recovery Rider Annual  
Adjustment

Docket No. E017/M-18-748

**OTTER TAIL POWER COMPANY  
REPLY COMMENTS**

## **I. INTRODUCTION**

Otter Tail Power Company (Otter Tail) submits these Reply Comments in response to the September 3, 2020 Supplemental Comments (Department September 3 Comments) of the Minnesota Department of Commerce (the Department). Otter Tail respectfully requests the Commission approve Otter Tail’s revised Transmission Cost Recovery Rider (TCRR) rates as provided in its August 24, 2020 Comments.

As discussed in Otter Tail’s August 24, 2020 Comments, the TCRR was created by the Legislature to encourage development of transmission.<sup>1</sup> The Department’s recommendations undermine that policy, seeking to exclude projects MISO has determined benefit Otter Tail and the integrated transmission system. The Department further undermines this policy by signaling its intent to continue trying to deny Otter Tail’s recovery of the costs of its investment in the Big Stone Area Transmission (BSAT) Projects – a result deemed unconstitutional by the Minnesota Court of Appeals<sup>2</sup> – and by recommending the TCRR be canceled because Otter Tail obtained judicial review that upheld Otter Tail’s right to recover costs, including a return, that FERC deemed just and reasonable. Importantly, the obligation to give effect to FERC-approved wholesale rates and allow recovery of FERC-approved costs is not dependent on or subservient to Minn. Stat. § 216B.48 or any other state statute: it comes from the Supremacy Clause, which makes “the laws of the United States . . . ‘the supreme Law of the Land; . . . any Thing in the Constitution or Laws of any State to the Contrary notwithstanding.’”<sup>3</sup> The Commission can implement updated TCRR rates in this Docket without addressing the Department’s positions on

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<sup>1</sup> *In re Otter Tail Power Co.*, 942 N.W.2d 175, 180 (Minn. 2020).

<sup>2</sup> The Minnesota Supreme Court expressly recognized this holding by the Minnesota Court of Appeals and neither vacated nor reversed this holding. *In re Otter Tail Power Co.*, 942 N.W.2d 175, 179, n. 3, 181 (Minn. 2020).

<sup>3</sup> *In re Otter Tail Power Co.*, A17-1300, p. 4 (Minn. Ct. App. 2018) (citing U.S. Const., art. VI, cl. 2).

Otter Tail’s investment in the BSAT Projects, but its other recommendations should be rejected as part of the resolution of this Docket.

The Department’s recommendations seem to lack perspective on what Otter Tail’s investment in transmission infrastructure has achieved—including the recognized benefits of regional transmission, the fulfillment of state and federal policies encouraging regional transmission, and the particular success represented by Otter Tail’s execution on the BSAT Projects. Otter Tail’s August 24 Comments discussed that the Commission recognizes regional transmission provides “system-wide benefits,”<sup>4</sup> and that Congress has enacted policies that encourage the development of regional transmission projects like the BSAT Projects and other Multi-Value Projects (MVPs).<sup>5</sup> Those federal policies were integral to the development of the BSAT Projects, which were designed and approved by MISO to meet MISO-region wide needs, bringing wind power from North Dakota and South Dakota to the rest of the MISO grid and region.<sup>6</sup> Additionally, the BSAT Projects were placed into service on-time and *approximately 45 percent under budget*,<sup>7</sup> increasing the benefits of the BSAT Projects to all customers in the MISO region, including Minnesota customers.

There is a well-documented and broad public policy interest in facilitating beneficial investment in transmission. Otter Tail has responded well to that interest and, therefore, we respectfully request the Commission approve Otter Tail’s revised TCRR rates as provided in our August 24 Comments.

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<sup>4</sup> *In the Matter of the Application of Otter Tail Power Company for Authority to Increase Rates for Electric Service in Minnesota*, Docket No. E017/GR-15-1033, Findings of Fact, Conclusions and Order, p. 14 (May 1, 2017) [*hereinafter* Otter Tail 2016 Rate Case Order].

<sup>5</sup> 16 U.S.C. § 824s.

<sup>6</sup> *In re Otter Tail Power Co.*, 942 N.W.2d at 177 (“[The BSAT Projects] provide direct access from the resource-rich areas of North Dakota and South Dakota—particularly significant wind power—to the rest of the electric grid covering the middle of the North American continent and beyond.”). The MVP portfolio has facilitated an unprecedented amount of generation interconnection in the region, which has grown renewable generation capacity to levels that would not have been possible just a few years ago. Without the MVP projects, that generation would not have moved beyond the planning stages.

<sup>7</sup> MISO MVP Dashboard – July 2020, <https://cdn.misoenergy.org/MVP%20Dashboard-Q2-2020117055.pdf>. BSAT-Brookings was completed 53 percent under budget and BSAT-Ellendale 39 was completed 39 percent under budget.

## II. REPLY TO DEPARTMENT RECOMMENDATIONS

### A. TCRR Eligibility Projects (Docket No. E017/M-19-530)

#### 1. Eligibility

As described in Otter Tail's July 21 Comments in Docket No. 19-530 and August 24 Comments in this Docket, Minnesota law provides that transmission projects are eligible for recovery through the TCRR if they have been "determined by the Midcontinent Independent System Operator to benefit the utility or integrated transmission system."<sup>8</sup> In this Docket and in Docket No. 19-530, the Department has relied on standards that have no basis in Minnesota law or policy<sup>9</sup> to support its recommendation that the Commission deny TCRR recovery for the Lake Norden Area Transmission Improvements, the Rugby 41.6 kV Breaker Station and the Granville Junction Breaker Station (the New Projects).

Otter Tail's July 21 Comments in Docket No. 19-530 explain the New Projects have been approved by the regulatory commission of the state in which they are located (to the extent approval is required by the laws of that state). Those comments further explain that MISO determined the New Projects benefit Otter Tail and the integrated transmission system.<sup>10</sup> The benefit to Minnesota customers naturally follows.

Minnesota (as well as FERC, MISO, North Dakota and South Dakota) has adopted ratemaking for transmission investments that is predicated on the fact that *all* customers benefit from the transmission system being an integrated network for the delivery of power.<sup>11</sup> This rate treatment, including the allocation of costs among Otter Tail's retail jurisdictions, is longstanding and does not need to be reaffirmed in a rate case in order to deem the New Projects eligible for TCRR recovery.<sup>12</sup> The Commission regularly applies jurisdictional allocations when

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<sup>8</sup> Minn. Stat. § 216B.16, subd. 7b(a)(2) (emphasis added).

<sup>9</sup> Docket No. E017/M/19-530, Department July 7 Comments, p. 3-5; Department September 3 Comments, p. 7.

<sup>10</sup> Docket No. E017/M/19-530, Otter Tail July 21, 2020 Comments, p. 4-6.

<sup>11</sup> See *In the Matter of the Application of Otter Tail Power Company for Authority to Increase Rates for Electric Utility Service in Minnesota*, Docket No. E017/GR-10-239, Findings of Fact, Conclusions and Recommendation, ¶ 147 (Feb. 14, 2011) [*hereinafter* Otter Tail 2010 Rate Case ALJ Report], *adopted by* Findings of Fact, Conclusions, and Order, p. 18-19 (April 25, 2011).

<sup>12</sup> Department September 3 Comments, p. 7 ("However, MISO does not determine jurisdictional cost allocations of transmission projects; such determinations are made in a general rate case. ... Until OTP's next rate case, the costs of these new projects should not be charged to Minnesota ratepayers in the TCRR.").

establishing TCRR rates and can do so in this case.<sup>13</sup> The New Projects should be deemed eligible for TCRR recovery effective January 1, 2020.

## 2. Costs

The Department makes three recommendations regarding the costs of the New Projects. First, the Department recommends any related wholesale transmission revenues or net credits associated with the New Projects be included in the TCRR.<sup>14</sup> Otter Tail agrees with this recommendation and included wholesale revenue credits in the calculation of proposed TCRR rates.<sup>15</sup> Second, the Department recommends rate base be adjusted downward to reflect property tax timing differences.<sup>16</sup> Otter Tail agrees with this recommendation and incorporated it into its calculations as part of the August 24 Comments, though this recommendation does not change proposed TCRR rates.<sup>17</sup>

The Department's third recommendation relates to costs of the Rugby and Granville Junction projects. In its August 14 Comments, the Department requested information regarding cost caps of projects included in the TCRR.<sup>18</sup> Otter Tail provided information in its August 24 Reply Comments regarding initial budgeted amounts, excluding internal costs, for each of the New Projects used in regulatory filings in North Dakota and South Dakota approving the projects, which are comparable to cost caps. After reviewing the Department's September 3 Comments, Otter Tail recognized that the information provided on August 24 in Table 2 contained an error, whereby internal costs were incorrectly excluded from the completed project costs [Line No. 3]. Otter Tail apologizes for the error.

The corrected information [Line No. 3 and resulting calculation in Line No. 4] is provided below. The amounts shown in Revised Table 2 are consistent with the amounts included in Attachments 5, 6, and 7 to Otter Tail's May 7, 2020 and August 24, 2020 Comments,

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<sup>13</sup> See *In the Matter of Otter Tail Power Company's Request for Approval of a Transmission Cost Recovery Rider Including the Proposed 2010 Transmission Factor*, Docket No. E017/M-09-881, Comments of the Minnesota Department of Commerce, p.18-19 (Sept. 28, 2009) (" OTP's proposed rate design uses the transmission demand allocation factor, D2, which was used to allocate total revenue requirements from OTP's last Minnesota general rate case, to allocate total revenue requirements to jurisdictions (Minnesota 50.79%) and rate classes. ... OTP's proposed rate design methodology is consistent with OTP's most recent rate case and consistent with the methodology used in other recent Rider filings. Thus, based on our analysis and the information available at this time, the OES recommends approval of the rate design in the Company's proposed Rider.").

<sup>14</sup> Department September 3 Comments, p. 11.

<sup>15</sup> Otter Tail August 24 Reply Comments, Attachment 5, line 39, Attachment 6, line 43, Attachment 7, line 43.

<sup>16</sup> Department September 3 Comments, p. 11.

<sup>17</sup> Otter Tail August 24 Reply Comments, p. 2.

<sup>18</sup> Department August 14 Comments, p. 11.

as well as discussion of the costs of the New Projects in the body of Otter Tail’s May 7 Comments.<sup>19</sup> Importantly, this correction does not change the information included in the attachments to Otter Tail’s August 24 filing or the proposed TCRR rates.

**Revised Table 2**  
**Comparison of Budget Project Costs Excluding Internal Costs (OTP Total)**  
(in millions)

	A	B	C	D	E
		Lake Norden Phase I	Lake Norden Phase II	Rugby	Granville Junction
1	Proceeding	SD Docket No. EL-18-048	SD Docket No. EL-18-048	ND Case No. PU-16-624	ND Case No. PU-16-624
2	Initial Regulatory Estimate	\$9.5	\$19.6	\$1.3	\$0.7
3	Completed/Current Cost	\$7.2	\$13.6	\$1.1	\$0.6
4	<b>Amount Under Budget</b>	<b>\$2.3</b>	<b>\$6.0</b>	<b>\$0.2</b>	<b>\$0.1</b>

Accordingly, Otter Tail requests the Commission approve the TCRR rates as proposed in Otter Tail’s August 24 filing and not adopt the Department’s recommended reduction in the costs of Rugby and Granville Junction.<sup>20</sup>

**B. Carrying Charges**

As described in Otter Tail’s May 7 and August 24 Comments in this Docket, Otter Tail has requested only one-half the projected December 31, 2020 tracker balance be included in the proposed TCRR rates to be implemented January 1, 2021, delaying recovery of over \$6.7 million. This proposal reduces rates for residential customer using 1,000 kWh a month by \$3.52 per month as compared to traditional treatment, which would recover the full balance in a single recovery period.

In recognition of the extraordinary circumstances of this case, including the non-standard recovery of the tracker balance as well as the fact that a significant portion of the projected December 2020 tracker balance (\$5.976 million, or approximately 45 percent) is attributable to credits that were issued after the Minnesota Court of Appeals rejected the Department’s proposed rate treatment for the BSAT Projects on June 11, 2018, Otter Tail has requested a

<sup>19</sup> Otter Tail May 7 Comments, p. 4.

<sup>20</sup> Department September 3 Comments, p. 11.

carrying charge on the unrecovered TCRR tracker balance. The Department recommends that no carrying charge be allowed, or if one is allowed, that it apply only on a going-forward basis and be set at the cost of Otter Tail's short-term debt.<sup>21</sup> Both recommendations are not reasonable, in light of the circumstances of this case.

Otter Tail acknowledges that historically the Commission has not allowed carrying charges on unrecovered TCRR tracker balances.<sup>22</sup> Yet, each carrying charge request is fact specific, as recognized by the Commission.<sup>23</sup> Based on the facts of the particular request, the Commission has authorized a carrying charge equal to Otter Tail's cost of capital in Otter Tail's Environmental Cost Recovery Rider (ECRR).<sup>24</sup> The unique circumstances of this case similarly justify a carrying charge.

The Department asserts that any carrying charge should be limited to Otter Tail's cost of short-term debt, based on the treatment of conservation improvement programs.<sup>25</sup> This case is factually different from the Conservation Improvement Program (CIP) Rider, justifying different results. The Commission limited carrying charges for CIP Riders because CIP Rider tracker balances are driven by financial incentives, not out of pocket costs:

While the CIP financial incentives making up the bulk of the CIP tracker account serve an important public-policy purpose, they are not the kind of costs—out of pocket costs—for which rate-of-return treatment can be most readily justified.<sup>26</sup>

Here, Otter Tail has incurred out of pocket costs and has not received current recovery. Recovery will be further delayed – to the significant benefit to customers – under Otter Tail's proposal to forego full recovery of the tracker balance in a single rate period.

The circumstances of this case are unique and justify Otter Tail's request that the unrecovered TCRR balance be subject to a carrying charge equal to Otter Tail's cost of capital. It is Otter Tail's intent that this be a one-time request to accommodate the cost-mitigation being proposed.

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<sup>21</sup> Department September 3 Comments, p. 11.

<sup>22</sup> Department Comments, p. 17 (citing Commission's March 10, 2014 Order in Docket No. E017/M-13-103).

<sup>23</sup> *In the Matter of Otter Tail Power Company's 2013 Demand-Side Management Financial Incentives and Annual Filing to Update the CIP Rider*, Docket No. E017/M-14-201, Order Approving Financial Incentive, Setting Conservation Cost Recovery Adjustment, Reducing Carrying Charges, and Varying Rules, p. 7 (Sept. 26, 2014) ("Granting or denying carrying charges on rate-rider tracker-account balances is ... a decision that must be made case by case, based on the facts at hand.") [*hereinafter* OTP 2014 CIP Rider Order].

<sup>24</sup> *In the Matter of Otter Tail Power Company's (OTP) Request for Approval of its Environmental Upgrades Cost Recovery Rider for the Big Stone Plant*, Docket No. E017/M-13-648, Order (Dec. 18, 2013).

<sup>25</sup> Department September 3 Comments, p. 5.

<sup>26</sup> OTP 2014 CIP Rider Order, p. 7.

### C. Discussion of BSAT Projects in Subsequent Rate Case

The Department acknowledges that future ratemaking regarding the BSAT Projects is not at issue in this proceeding.<sup>27</sup> The Commission need not make any finding regarding obligations in a subsequent rate case filing or the relevance of Minn. Stat. § 216B.48. Therefore, Otter Tail requests the Commission not adopt the Department recommendations on this issue.

Importantly, the obligation to give effect to FERC-approved wholesale rates is not dependent on or subservient to Minn. Stat. § 216B.48 or any other state statute: it comes from the Supremacy Clause, which makes “the laws of the United States ... ‘the supreme Law of the Land; . . . any Thing in the Constitution or Laws of any State to the Contrary notwithstanding.’”<sup>28</sup> “Under United States Supreme Court and Minnesota Supreme Court case law, [retail rates established by the Commission] must give effect to FERC-approved wholesale rates.”<sup>29</sup> Otter Tail will discuss in its future rate case filings how Minnesota base retail rates can be established consistent with the obligation to give effect to FERC-approved rates for Otter Tail’s investments in the BSAT Projects.

The Department’s continued focus on Minn. Stat. § 216B.48 is misplaced. As discussed in Otter Tail’s August 24 Comments, the Department cannot use Minn. Stat. § 216B.48 (rather than Minn. Stat. § 216B.16) to achieve a result (appropriation of some or all of Otter Tail’s earnings from the BSAT Projects and denial of FERC-authorized costs) the Minnesota Court of Appeals deemed unconstitutional. This conclusion is bolstered by the Minnesota Court of Appeals expressly rejecting the Department’s arguments related to the nature of Minnesota retail rates.<sup>30</sup> Finally, also as discussed in Otter Tail’s August 24 Reply Comments, jurisdictional allocations are a common part of every rate case (not just Otter Tail’s) and that process has never been conducted through a Minn. Stat. § 216B.48 analysis. The Department’s recommendations on this issue should not be adopted.

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<sup>27</sup> Department September 3 Comments, p. 9 (“Finally, given the decision by the Minnesota Supreme Court regarding the TCRR and the rates set in OTP’s prior rate case, the Department agrees with OTP that the Commission need not decide in this proceeding the future ratemaking in OTP’s next rate case.”).

<sup>28</sup> *In re Otter Tail Power Co.*, A17-1300, p. 4 (Minn. Ct. App. 2018) (citing U.S. Const., art. VI, cl. 2).

<sup>29</sup> *In re Otter Tail Power Co.*, A17-1300, p. 10 (Minn. Ct. App. 2018).

<sup>30</sup> *Compare In re Otter Tail Power Co.*, A17-1300, p. 13 (Minn. Ct. App. 2018) (“Just as the Minnesota Supreme Court’s decision in *N. States Power* did not unbundle rates, neither will our decision here.”), *with* Department September 3 Comments, p. 7-9.



#### **D. Department Recommendation to Cancel Otter Tail's TCRR**

The Department continues to recommend that the Commission consider cancelling Otter Tail's TCRR.<sup>31</sup> The only change since prior cases is that Otter Tail sought judicial review to recover its FERC-approved costs, including its FERC-approved return on its investment for the BSAT Projects. The Minnesota Court of Appeals affirmed that Otter Tail has a constitutional right to recover those costs. While the Department disagrees with this decision, the Commission should not follow such a path.

FERC has established the cost of service and just and reasonable rates regarding Otter Tail's investment in the BSAT Projects. All-in allocation does not permit Otter Tail to recover those costs. Given the size of Otter Tail's investment and financial harm that results from all-in allocation, Otter Tail sought judicial review and its position was accepted. The Department dismissively characterizes Otter Tail's attempt to recover its FERC-authorized costs as "the Company's choice",<sup>32</sup> but all Otter Tail seeks is to recover the amounts deemed just and reasonable by FERC, no more and no less. The Commission should give no consideration to cancelling a cost recovery mechanism that was created by the Legislature to encourage development of transmission,<sup>33</sup> and that the Commission has stated "expedite[s] the construction of critically needed infrastructure."<sup>34</sup> The Commission should reject the Department's suggestion that Otter Tail be prevented from using this mechanism due to Otter Tail's protection of its constitutional rights.

### **III. CONCLUSION**

Otter Tail respectfully requests that the Commission approve the TCRR annual rate adjustment mechanism as set forth in the Attachments 1 through 15 of Otter Tail's August 24 Comments for usage on and after January 1, 2021.

*[Signature Page Follows]*

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<sup>31</sup> Department September 3 Comments, p. 11.

<sup>32</sup> Department September 3 Comments, p. 9.

<sup>33</sup> *In re Otter Tail Power Co.*, 942 N.W.2d 175, 180 (Minn. 2020).

<sup>34</sup> *In the Matter of Otter Tail Power Company's Request for Approval of a Transmission Cost Recovery Rider Including the Proposed Transmission Factor for the Recovery Period from May 2, 2013 to April 30, 2014*, Docket No. E017/M-13-103, Order Capping Costs, Denying Rider Recovery of Excess Costs, and Requiring Inclusion of All MISO Schedule 26 Costs and Revenues in TCR Rider, p. 9 (Mar. 10, 2014).

Dated: September 14, 2020

Respectfully Submitted,

OTTER TAIL POWER COMPANY

By: /s/ CARY STEPHENSON

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By: /s/ BRUCE GERHARDSON

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## **CERTIFICATE OF SERVICE**

**RE: In the Matter of the Petition of Otter Tail Power Company for  
Approval of a Transmission Cost Recovery Rider Annual Adjustment  
MPUC Docket No. E017/M-18-748**

I, Kim Ward, hereby certify that I have this day served a copy of the following, or a summary thereof, on Will Seuffert and Sharon Ferguson by e-filing, and to all other persons on the attached service list by electronic service or by First Class mail.

**Otter Tail Power Company  
Reply Comments**

Dated this 14th day of **September 2020**.

/S/ KIM WARD

Kim Ward, Regulatory Filing Coordinator  
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