

BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

David C. Boyd
J. Dennis O'Brien
Thomas Pugh
Phyllis A. Reha
Betsy Wergin

Chair
Commissioner
Commissioner
Commissioner
Commissioner

In the Matter of an Investigation of Whether the Commission Should Take Action on Demand Response Bid Directly into the MISO Markets by Aggregators of Retail Customers Under FERC Orders 719 and 719-A

ISSUE DATE: May 18, 2010

DOCKET NO. E-999/CI-09-1449

ORDER PROHIBITING BIDDING OF DEMAND RESPONSE INTO ORGANIZED MARKETS BY AGGREGATORS OF RETAIL CUSTOMERS AND REQUIRING FURTHER FILINGS BY UTILITIES

PROCEDURAL HISTORY

I. Federal Action on Aggregating Retail Customers' Demand Response

In October 2008 and July 2009, the Federal Energy Regulatory Commission (FERC) issued and revised a final rule requiring regional transmission organizations, which operate both regional transmission facilities and regional wholesale energy markets, to permit non-utilities to bid into their wholesale energy markets reductions in electrical usage aggregated from retail customers.¹ These usage reductions, termed "demand response," could potentially reduce regional energy prices by reducing the need to run expensive peaking plants during hours of highest demand.

The non-utility aggregators, called ARCs (Aggregators of Retail Customers), would pay utility customers to reduce their usage – e.g., by turning off machinery, appliances, manufacturing processes – during periods of high demand. The ARCs would make a profit by selling these usage reductions into the wholesale energy market as a substitute for additional generation when generation prices are highest.

FERC limited these new aggregation and sale rights to the demand response of retail customers served by large utilities – those distributing at least 4,000,000 megawatt hours of electricity annually – unless the relevant retail regulatory authority affirmatively chose to include the customers of smaller utilities. FERC also prohibited the aggregation and sale of the demand response of customers served by large utilities if the relevant retail authority prohibited it:

¹ 18 CFR § 35.28 (g) (1) (iii).

. . . . An independent system operator or regional transmission organization must not accept bids from an aggregator of retail customers that aggregates the demand response of the customers of utilities that distributed more than 4 million megawatt-hours in the previous fiscal year, where the relevant electric retail regulatory authority prohibits such customers' demand response to be bid into organized markets by an aggregator of retail customers . . . ²

II. This Proceeding

In January 2010, this Commission opened this investigation to determine how it should exercise its responsibilities under the new FERC rule. If the Commission took no action, the new rule would require the Midwest Independent Transmission System Operator (MISO), which operates the regional wholesale market that includes Minnesota, to begin accepting bids of demand response from ARCs as soon as FERC approved MISO's new tariff governing those transactions.

On January 13, 2010, the Commission issued a notice requesting comments on whether it should take action in response to the new rule, and if so, what action it should take. The following parties filed comments in response to the notice:

- Interstate Power and Light Company
- Otter Tail Power Company
- Xcel Energy
- Minnesota Power
- Great River Energy
- Dairyland Power Cooperative
- ArcelorMittal USA; UPM-Blandin Mill; Boise, Inc.; Enbridge Energy, Limited Partnership; Gerdau Ameristeel Corporation; Hibbing Taconite Company; NewPage Corporation; Sappi Cloquet, LLC; United States Steel Corporation; USG Interiors, Inc.; and United Taconite, LLC, filing jointly as the "Large Industrial Group"
- EnerNOC, Inc.
- The Office of Energy Security of the Minnesota Department of Commerce (OES)
- The Residential and Small Business Utilities Division of the Office of the Attorney General (RUD-OAG)

On May 4, 2010 the case came before the Commission. At that hearing the Center for Energy and Environment and the Izaak Walton League appeared jointly and offered oral comments.

FINDINGS AND CONCLUSIONS

I. Positions of the Parties

A. The Utilities

The commenting utilities urged the Commission to prohibit ARCs from aggregating and selling Minnesota retail customers' demand response as a wholesale energy product.

² *Id.*

They pointed out that Minnesota has been requiring utilities to develop demand response programs – called “demand side management” programs – for over twenty years and, for nearly as long, has required utilities to treat demand response as the equivalent of new generation in long-range planning. These policies have been extremely effective; all four Minnesota utilities distributing over 4,000,000 megawatt hours annually – the utilities whose customers can begin selling their demand response to ARCs under the new rule – can reduce peak load by more than 10% due to voluntary interruptible rates, radio-controlled load limiting equipment, “buy back” tariffs, and similar mechanisms.

They argued that permitting ARCs to compete with existing utility programs could have adverse consequences for ratepayers, including the following:

- It could make utilities’ long-term resource planning efforts more complex and less reliable, because utilities would no longer control the most effective demand-side management resources within their service areas. Instead, these resources would be sold into the regional wholesale market under terms and conditions designed to maximize profits to ARCs and the large customers with whom the ARCs would contract.
- It could raise overall system costs by forcing utilities to build more peaking plants, because they could no longer control peak load by interrupting very large customers at predetermined system demand levels under interruptible tariffs adopted under utility demand-side management programs. Instead, they would have to treat these customers’ loads as firm loads and build or buy generation to serve them.
- It could shift most of the costs of demand response to customers too small or energy-dependent to be attractive to ARCs, while shifting nearly all the benefits to ARC customers. Large customers with flexible energy usage would forgo electricity available to them at regulated, averaged rates and sell the forgone energy into the regional wholesale market at unregulated, non-averaged, much higher prices. Under current demand-side management programs, costs and benefits are intentionally distributed more widely.
- It could raise costs to ratepayers by stranding utility investments in demand-side management infrastructure (e.g., radio transmitters, metering equipment, load limiters), abandoned by large customers for new, ARC-provided infrastructure.

Finally, the utilities argued that there was serious doubt as to whether the Minnesota Public Utilities Act would permit ARCs to provide demand response services, given the statutory definition of “utility” and the prohibition against any utility serving outside its assigned service area.

B. The Environmental Groups

The Center for Energy and Environment and the Izaak Walton League asked the Commission to prohibit ARC operations in Minnesota. They emphasized that the state has been very effective in reducing peak demand through utility-run demand-side management and in integrating those reductions into utilities’ long-range planning.

They cautioned that permitting ARC operations could undermine that success by breaking current programs into smaller, less effective programs, since ARCs would target only potentially profitable demand response opportunities.

C. The Office of Energy Security

The OES recommended taking a cautious approach to ARCs, given the substantial success of existing demand-side management programs and the high priority state energy policy places on preserving and expanding this success. The agency noted that nearly all jurisdictions currently permitting ARC operations have deregulated electrical service, substantially reducing concerns about cost-shifting between customer classes and geographic regions.

At the same time, the agency emphasized the importance of exploring every potential opportunity to improve energy efficiency and increase conservation; the agency therefore recommended requiring utilities to file updated information within the next one to two years, focusing specifically on MISO's and other states' experience with ARCs, while again analyzing the likely impact of ARCs on Minnesota's demand-management programs, system reliability, resource planning, and rates.

D. The Residential and Small Business Utilities Division of the Office of the Attorney General

The RUD-OAG argued that ARC operations were prohibited under Minnesota law because ARCs would be legally classified as utilities but could not legally function as utilities, since they would lack assigned service areas and the ability to provide the full range of services required of utilities. The agency also raised many of the practical concerns raised by the utilities and the OES – e.g., the potential impact of ARC sales on long-range planning, the possible need to build or acquire more peaking capacity to cover formerly interruptible load that would now be firm.

More fundamentally, the RUD-OAG was concerned that rate discrimination could result from permitting ARC customers to opt in and out of their utilities' aggregated load for financial advantage. The agency argued that other customers' rates would include the full costs and risks – and none of the benefits – of ARC customers' participation in the wholesale markets. ARC customers would essentially be selling their entitlement to buy electricity at averaged rates – an entitlement that exists only because of public policies requiring averaged rates and the large investments made to meet that requirement by the general body of ratepayers – and converting it to a wholesale product to be sold for private profit.

The agency argued that it would be inequitable and discriminatory to permit these transactions without factoring the underlying subsidies into the utility rate structure.

E. The Large Industrial Group

The Large Industrial Group supported permitting ARCs to operate within the State of Minnesota, pointing to FERC's conclusions in Order 719 that –

Demand response can provide competitive pressure to reduce wholesale power prices; increases awareness of energy usage; provides for more efficient operation of markets; mitigates market power; enhances reliability; and in combination with certain new technology, can support the use of renewable energy resources, distributed power generation, and advanced metering.³

The group was concerned that demand response might currently be undervalued and that permitting market forces to determine its value could result in its expansion and greater efficiency. The group also said that introducing market forces could lead to new and more effective strategies for tapping the demand-response potential of the residential class.

F. EnerNOC, Inc.

EnerNOC was the only ARC to file comments in this case. The company participates in the wholesale markets of four regional transmission organizations – ISO-New England, PJM Interconnection, New York ISO, and ERCOT – aggregating the demand response of commercial, industrial, and institutional retail customers. Besides acting as an ARC, EnerNOC also provides demand side management services to individual utilities, power grid operators, and large customers throughout the United States; Ontario, Canada; and portions of the United Kingdom.

EnerNOC stated that its experience indicates that ARCs can achieve higher levels of demand response than utilities acting alone, mainly because demand response is the ARCs' core competency. The company emphasized its success in achieving substantial demand response in other jurisdictions, both as an ARC and as a third-party provider of demand side management services. It stated that it contracts with utilities throughout the nation not only to design and operate demand response programs, but to act on their behalf bidding demand response into wholesale markets.

EnerNOC emphasized that there are multiple models for increasing demand response, including ARCs, contracts between utilities and companies specializing in demand response, and combinations of ARCs and third-party contracts. The company urged the Commission to explore every model that might increase demand response in Minnesota.

II. Commission Action

The Commission concurs with the parties that FERC Orders 719 and 719-A present complex challenges and potential opportunities that must be carefully examined before taking any action to permit ARCs to aggregate retail demand response in Minnesota.

First, the Minnesota Public Utilities Act creates a comprehensive regulatory structure to ensure that all state providers of electrical service have just and reasonable rates and just and reasonable terms and conditions of service.⁴ It is unclear at this point how ARCs would fit into that regulatory structure and what mechanisms the Commission would use to ensure that their actions and practices met the “just and reasonable” legal standard and served the public interest.

³ *Wholesale Competition in Regions with Organized Electric Markets*, Docket Nos. RM-7-19-000 and AD07-7-000, 125 FERC ¶ 61,071, P 16.

⁴ Minn. Stat. Chapter 216B; Minn. Stat. § 216B.03.

Second, Minnesota has a long history of effective demand side management – for decades Minnesota utilities have been required to treat conservation and demand response as front-line resources for meeting need, not as peripheral concerns. Very substantial amounts of demand response have been achieved cost-effectively and to the benefit of all customer classes.

It is important not to jeopardize these gains or to jeopardize utilities’ ability to build on these gains – there is no room in the statutory scheme for slippage in existing levels of demand response. Statutes continue to require that utilities factor demand response into their long-term resource acquisition plans and that they demonstrate that any new generating or transmission facility they propose cannot be replaced more cost-effectively by conservation and load-management.⁵ To comply with these statutes, utilities must have meaningful influence or control over their customers’ demand response. The Commission will therefore prohibit ARC operations at present.

At the same time, it is critical not to miss opportunities for future gains through over-reliance on past successes. It is therefore important to have a clear understanding of current demand response levels, a good grasp of where future gains might originate, and a working knowledge of how ARCs and other third-party demand-response specialists are performing in other jurisdictions as a point of reference.

The Commission will therefore require the four Minnesota utilities that would be affected by the new FERC rules to make filings in the near term providing detailed descriptions of their demand response programs, analyses of the programs’ effectiveness, and discussions of how effectiveness could be improved. Over the longer term these utilities will be required to make filings reporting on ARC operations in MISO and other organized markets, analyzing the effects of ARC operations in those markets, and setting forth the tariff and program changes that would be necessary to facilitate ARC operations within their service areas.

Finally, the Commission remains open to pilot projects designed to explore the potential for ARCs and other third-party providers to increase total levels of demand response in Minnesota. Proposed projects must conform with good pilot project design and must include protections to ensure no ratepayer harm and no reduction in existing levels of demand response. They must demonstrate a likelihood of increasing demand response, as opposed to simply replacing existing projects with new ones. And they must demonstrate serious engagement with the concerns raised by the stakeholders in this docket, as well as with the stakeholders themselves.

The filing requirements for affected utilities and the design requirements for pilot projects are set forth in more detail below. The Commission will review these filings, and stakeholder comments on them, at an informational meeting the end of all comment periods.

ORDER

1. Pursuant to the provisions of 18 CFR § 35.28 (g) (1) (iii), the Commission prohibits the demand response of the retail customers of Xcel Energy, Minnesota Power, Interstate Light and Power, and Otter Tail Power from being bid into organized markets by non-utility aggregators of retail customers.

⁵ Minn. Stat. §§ 216B.2422 and 216B.243, subd. 3.

2. Xcel Energy, Minnesota Power, Interstate Light and Power, and Otter Tail Power shall make filings describing their demand response programs, analyzing the effectiveness of these programs, and discussing how effectiveness could be improved, as by conducting pilot projects, issuing requests for proposals, or other mechanisms. The Commission delegates to the Executive Secretary the authority to set further or more specific content requirements, to set time lines, and to establish comment periods for these filings.
3. On or before September 1, 2011, Xcel Energy, Minnesota Power, Interstate Light and Power, and Otter Tail Power shall file two reports:
 - a. a report on ARC operations in the wholesale markets operated by MISO and in the wholesale markets operated by other independent system operators and regional transmission organizations, focusing specifically on the impact of ARC operations on prices, reliability, nonparticipating customers, utility operations, and utility-operated demand response programs; and
 - b. a report on the tariff and program changes that each utility believes would be necessary to accommodate ARC operations in Minnesota.
4. The Commission delegates to the Executive Secretary the authority to vary the filing date set in paragraph 3 and to establish comment periods for these filings.
5. Proposals for pilot projects designed to explore the potential for ARCs and other third-party providers to increase levels of demand response in Minnesota shall do the following:
 - a. demonstrate broad-based acceptance by critical stakeholders, including the utilities, the OES, and the RUD-OAG;
 - b. address the concerns raised by stakeholders in this case;
 - c. result in no cost-shifting;
 - d. do no harm to ratepayers;
 - e. represent demand response efforts over and above current efforts, as opposed to replacing those efforts or changing the identity of the persons performing them.
 - f. conform with good pilot project design, including the following characteristics:
 - (1) operating for a defined period of time, with provisions permitting the Commission to end, renew, or modify the project;
 - (2) operating under conditions that meet the public interest, such as Commission review of program costs to ensure that costs are reasonable;

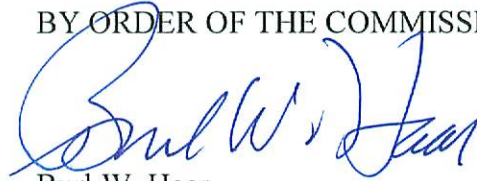
(3) complying with standards set at the beginning of the project to show that the project is meeting its goals;

(4) operating subject to periodic evaluation and reporting requirements; and

(5) designed to ensure that project can be terminated if necessary without excessive harm to ratepayers or other affected persons.

6. This Order shall become effective immediately.

BY ORDER OF THE COMMISSION



Burl W. Haar

Executive Secretary



(SEAL)

This document can be made available in alternative formats (i.e., large print or audio tape) by calling 651.201.2202 (voice). Persons with hearing or speech disabilities may call us through Minnesota Relay at 1.800.627.3529 or by dialing 711.

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Julia	Anderson	Julia.Anderson@state.mn.us	Office of the Attorney General-DOC	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	No	OFF_SL_9-1449_Official
Keith L.	Beall	kbeall@midwestiso.org	Midwest ISO Legal Dept.	P.O. Box 4202 Carmel, IN 46082	Paper Service	No	OFF_SL_9-1449_Official
Michael	Bradley	bradley@moss-barnett.com	Moss & Barnett	4800 Wells Fargo Ctr 90 S 7th St Minneapolis, MN 55402-4129	Paper Service	No	OFF_SL_9-1449_Official
Bernadeen	Brutlag	bbrutlag@otpc.com	Otter Tail Power Company	PO Box 496 215 S Cascade St Fergus Falls, MN 565380496	Electronic Service	No	OFF_SL_9-1449_Official
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 500 Saint Paul, MN 551012198	Electronic Service	Yes	OFF_SL_9-1449_Official
Ronald M.	Giteck	ron.giteck@state.mn.us	Office of the Attorney General-RUD	Residential Utilities Division 445 Minnesota Street, 900 BRM Tower St. Paul, MN 55101	Paper Service	No	OFF_SL_9-1449_Official
Burl	Haar	burl.haar@state.mn.us	Public Utilities Commission	121 7th Place East Suite 350 St. Paul, MN 55101-2147	Electronic Service	No	OFF_SL_9-1449_Official
Lori	Hoyum		Minnesota Power	30 West Superior Street Duluth, MN 55802	Paper Service	No	OFF_SL_9-1449_Official
Paula N.	Johnson		Interstate Power and Light Company	200 First Street SE PO Box 351 Cedar Rapids, IA 524060351	Paper Service	No	OFF_SL_9-1449_Official
Allen	Krug	N/A	xcel	414 Nicollet Mall-7th fl Mpls, MN 55401	Paper Service	No	OFF_SL_9-1449_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Jeffrey L.	Landsman	jlandsman@wheelerlaw.com	Wheeler, Van Sickle & Anderson, S.C.	Suite 801 25 West Main Street Madison, WI 537033398	Paper Service	No	OFF_SL_9-1449_Official
John	Lindell	agorud.ecf@state.mn.us	Office of the Attorney General-RUD	900 BRM Tower 445 Minnesota St St. Paul, MN 551012130	Electronic Service	No	OFF_SL_9-1449_Official
John	McWilliams	jmm@dairynet.com	Dairyland Power Cooperative	3200 East Ave SPO Box 817 La Crosse, WI 54601-7227	Paper Service	No	OFF_SL_9-1449_Official
Andrew	Moratzka	apm@mcmlaw.com	Mackall, Crouse and Moore	1400 AT&T Tower 901 Marquette Ave Minneapolis, MN 55402	Paper Service	No	OFF_SL_9-1449_Official
Mona	Tierney-Lloyd	mtierney- lloyd@enemoc.com	EnerNoc Inc	P. O. Box 378 Cayucos, CA 93430	Paper Service	No	OFF_SL_9-1449_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
LARRY	ANDERSON	LL.ANDERSON@SMMPA.ORG	SMMPA	500 1ST AVE. SW ROCHESTER, MN 55902-3303	Paper Service	No	SPL_SL_9- 1449_SPL_SL_9- 1449_SPL_SL_9- 1449_Interested Parties
David	Aafedt	daafedt@winthrop.com	Winthrop & Weinstine, P.A.	Suite 3500, 225 South Sixth Street Minneapolis, MN 554024629	Paper Service	No	SPL_SL_9- 1449_SPL_SL_9- 1449_SPL_SL_9- 1449_Interested Parties
Julia	Anderson	Julia.Anderson@state.mn.us	Office of the Attorney General-DOC	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	SPL_SL_9- 1449_SPL_SL_9- 1449_SPL_SL_9- 1449_Interested Parties
Christopher	Anderson	canderson@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022191	Electronic Service	No	SPL_SL_9- 1449_SPL_SL_9- 1449_SPL_SL_9- 1449_Interested Parties
Dana	Badgerow	N/A		200 Administration Bldg 50 Sherburen Ave Saint Paul, MN 55155	Paper Service	No	SPL_SL_9- 1449_SPL_SL_9- 1449_SPL_SL_9- 1449_Interested Parties
Thomas	Bailey	tbailey@briggs.com	Briggs And Morgan	2200 IDS Center 80 S 8th St Minneapolis, MN 55402	Electronic Service	No	SPL_SL_9- 1449_SPL_SL_9- 1449_SPL_SL_9- 1449_Interested Parties
John	Bailey	bailey@ilsr.org	Institute For Local Self- Reliance	1313 5th St SE Ste 303 Minneapolis, MN 55414	Electronic Service	No	SPL_SL_9- 1449_SPL_SL_9- 1449_SPL_SL_9- 1449_Interested Parties
Tim	Barth		Marathon Petroleum Company	P.O. Box 3128 Houston, TX 77253	Paper Service	No	SPL_SL_9- 1449_SPL_SL_9- 1449_SPL_SL_9- 1449_Interested Parties
James J.	Bertrand	james.bertrand@leonard.com	Leonard Street & Deinard	Suite 2300 150 South Fifth Street Minneapolis, MN 55402	Paper Service	No	SPL_SL_9- 1449_SPL_SL_9- 1449_SPL_SL_9- 1449_Interested Parties
Brenda A.	Bjorklund	brenda.bjorklund@centerpointenergy.com	CenterPoint Energy	800 LaSalle Avenue Floor 14 Minneapolis, MN 55402	Paper Service	No	SPL_SL_9- 1449_SPL_SL_9- 1449_SPL_SL_9- 1449_Interested Parties

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
David L.	Blair		East River Electric Power Cooperative	121 SE First Street PO Box 227 Madison, SD 57042	Paper Service	No	SPL_SL_9- 1449_SPL_SL_9- 1449_SPL_SL_9- 1449_Interested Parties
William A.	Blazar	bblazar@mnchamber.com	Minnesota Chamber Of Commerce	Suite 1500 400 Robert Street North St. Paul, MN 55101	Paper Service	No	SPL_SL_9- 1449_SPL_SL_9- 1449_SPL_SL_9- 1449_Interested Parties
Jonathon	Bloomberg			3232 Holmes Ave. Minneapolis, MN 55408	Paper Service	No	SPL_SL_9- 1449_SPL_SL_9- 1449_SPL_SL_9- 1449_Interested Parties
Roger	Boehner	lorenbrft@aol.com		6511 Humboldt Avenue N., #210 Brooklyn Center, MN 55430	Paper Service	No	SPL_SL_9- 1449_SPL_SL_9- 1449_SPL_SL_9- 1449_Interested Parties
Steven	Bosacker		City of Minneapolis	City Hall, Room 301M 350 South Fifth Street Minneapolis, MN 554151376	Paper Service	No	SPL_SL_9- 1449_SPL_SL_9- 1449_SPL_SL_9- 1449_Interested Parties
Michael	Bradley	bradley@moss-barnett.com	Moss & Barnett	4800 Wells Fargo Ctr 90 S 7th St Minneapolis, MN 55402-4129	Paper Service	No	SPL_SL_9- 1449_SPL_SL_9- 1449_SPL_SL_9- 1449_Interested Parties
Bob	Bridges	bob.bridges@versopaper.com	Verso Paper	100 East Sartell Street Sartell, MN 56377	Paper Service	No	SPL_SL_9- 1449_SPL_SL_9- 1449_SPL_SL_9- 1449_Interested Parties
Bernadeen	Brullag	bbrullag@olpco.com	Otter Tail Power Company	PO Box 496 215 S Cascade St Fergus Falls, MN 565380496	Electronic Service	No	SPL_SL_9- 1449_SPL_SL_9- 1449_SPL_SL_9- 1449_Interested Parties
Bill	Bullard		South Dakota Public Utilities Commiss	Capitol Building Pierre, SD 575015070	Paper Service	No	SPL_SL_9- 1449_SPL_SL_9- 1449_SPL_SL_9- 1449_Interested Parties
Robert S.	Carney, Jr.			4232 Colfax Ave. S. Minneapolis, MN 55409	Paper Service	No	SPL_SL_9- 1449_SPL_SL_9- 1449_SPL_SL_9- 1449_Interested Parties

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Douglas M.	Carnival		McGrann Shea Anderson Carnival	Straughn & Lamb 800 Nicollet Mall, Suite 2600 Minneapolis, MN 554027035	Paper Service	No	SPL_SL_9- 1449_SPL_SL_9- 1449_SPL_SL_9- 1449_Interested Parties
Linda	Chavez	linda.chavez@state.mn.us	Department of Commerce	85 7th Place E Ste 500 Saint Paul, MN 55101-2198	Electronic Service	Yes	SPL_SL_9- 1449_SPL_SL_9- 1449_SPL_SL_9- 1449_Interested Parties
Gary	Chesnut	gchesnut@agp.com	AG Processing Inc. a cooperative	12700 West Dodge Road PO Box 2047 Omaha, NE 681032047	Paper Service	No	SPL_SL_9- 1449_SPL_SL_9- 1449_SPL_SL_9- 1449_Interested Parties
Dale	Christensen		LD Exchange.Com, Inc.	Suite 230 2510 North Redhill Avenue Santa Ana, CA 927055542	Paper Service	No	SPL_SL_9- 1449_SPL_SL_9- 1449_SPL_SL_9- 1449_Interested Parties
Kenneth A.	Colburn	kcolburn@symbioticstrategi es.com	Symbiotic Strategies, LLC	26 Winton Road Meredith, NH 32535413	Paper Service	No	SPL_SL_9- 1449_SPL_SL_9- 1449_SPL_SL_9- 1449_Interested Parties
Gary	Connett		Great River Energy	12300 Elm Creek Blvd N Maple Grove, MN 553694718	Paper Service	No	SPL_SL_9- 1449_SPL_SL_9- 1449_SPL_SL_9- 1449_Interested Parties
Sheryl	Corrigan		Minnesota Pollution Control Agency	520 Lafayette Road North St. Paul, MN 551554194	Paper Service	No	SPL_SL_9- 1449_SPL_SL_9- 1449_SPL_SL_9- 1449_Interested Parties
George	Crocker	gwillc@nawo.org	North American Water Office	PO Box 174 Lake Elmo, MN 55042	Paper Service	No	SPL_SL_9- 1449_SPL_SL_9- 1449_SPL_SL_9- 1449_Interested Parties
Mark F.	Dahlberg	markdahlberg@nweco.com	Northwestern Wisconsin Electric Company	P.O. Box 9 104 South Pine Street Grantsburg, WI 548400009	Paper Service	No	SPL_SL_9- 1449_SPL_SL_9- 1449_SPL_SL_9- 1449_Interested Parties
Jeffrey A.	Daugherty	jeffrey- daugherty@centerpointene rgy.com	CenterPoint Energy	800 LaSalle Ave Minneapolis, MN 55402	Paper Service	No	SPL_SL_9- 1449_SPL_SL_9- 1449_SPL_SL_9- 1449_Interested Parties

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Leslie	Davis		Earth Protector, Inc.	PO Box 11688 Minneapolis, MN 554110688	Paper Service	No	SPL_SL_9- 1449_SPL_SL_9- 1449_SPL_SL_9- 1449_Interested Parties
Curt	Dieren	cdieren@dgrmet.com	L&O Power Cooperative	1302 South Union Street PO Box 511 Rock Rapids, IA 51246	Paper Service	No	SPL_SL_9- 1449_SPL_SL_9- 1449_SPL_SL_9- 1449_Interested Parties
Brian	Draxten		Otter Tail Power Company	P.O. Box 496 215 South Cascade Street Fergus Falls, MN 565380498	Paper Service	No	SPL_SL_9- 1449_SPL_SL_9- 1449_SPL_SL_9- 1449_Interested Parties
Jonathan M.	Drews	jdrews@utilityresearchchllc.com	Utility Research	P.O. Box 230 Fergus Falls, MN 56538	Paper Service	No	SPL_SL_9- 1449_SPL_SL_9- 1449_SPL_SL_9- 1449_Interested Parties
Chris	Duffrin	chrisd@thenec.org	Neighborhood Energy Connection	624 Selby Avenue St. Paul, MN 55104	Paper Service	No	SPL_SL_9- 1449_SPL_SL_9- 1449_SPL_SL_9- 1449_Interested Parties
Art	Dunn	N/A		520 Lafayette Rd Saint Paul, MN 55155-4194	Paper Service	No	SPL_SL_9- 1449_SPL_SL_9- 1449_SPL_SL_9- 1449_Interested Parties
John	Dwyer	johndwyer@lignite.com	Lignite Energy Council	1016 E. Owens Avenue P.O. Box 2277 Bismarck, ND 58502	Paper Service	No	SPL_SL_9- 1449_SPL_SL_9- 1449_SPL_SL_9- 1449_Interested Parties
Paul	Eger	N/A	MN Department of Administration	520 Lafayette Rd St. Paul, MN 55155-4194	Paper Service	No	SPL_SL_9- 1449_SPL_SL_9- 1449_SPL_SL_9- 1449_Interested Parties
Kristen	Eide-Tollefson	ket@wro-ns.net	R-CURE	P O Box 130 Frontenac, MN 55026	Paper Service	No	SPL_SL_9- 1449_SPL_SL_9- 1449_SPL_SL_9- 1449_Interested Parties
Brian	Elliott		Clean Water Action Alliance	326 Hennepin Ave. E. Minneapolis, MN 55414	Paper Service	No	SPL_SL_9- 1449_SPL_SL_9- 1449_SPL_SL_9- 1449_Interested Parties

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Ron	Elwood		Legal Services Advocacy Project	2324 University Ave Ste 101 St. Paul, MN 55114	Paper Service	No	SPL_SL_9-1449_SPL_SL_9-1449_SPL_SL_9-1449_Interested Parties
James C.	Erickson	jericksonbc@gmail.com	Kelly Bay Consulting	17 Quechee St Superior, WI 54880-4421	Paper Service	No	SPL_SL_9-1449_SPL_SL_9-1449_SPL_SL_9-1449_Interested Parties
Don	Ferber		Sierra Club - Midwest Office	4700 Allis Ave. Madison, WI 53716	Paper Service	No	SPL_SL_9-1449_SPL_SL_9-1449_SPL_SL_9-1449_Interested Parties
Pam	Fergen		Hennepin County Government Center CAO	A2000 300 S. Sixth Street Minneapolis, MN 55487	Paper Service	No	SPL_SL_9-1449_SPL_SL_9-1449_SPL_SL_9-1449_Interested Parties
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 500 Saint Paul, MN 551012198	Electronic Service	Yes	SPL_SL_9-1449_SPL_SL_9-1449_SPL_SL_9-1449_Interested Parties
Jennifer	Feyerherm		Sierra Club - Midwest Office	Suite 830 122 W. Washington Ave. Madison, WI 53703	Paper Service	No	SPL_SL_9-1449_SPL_SL_9-1449_SPL_SL_9-1449_Interested Parties
Karlene	Fine	kfine@nd.gov	Industrial Commission of North Dakota	14th Floor 600 E. Boulevard Avenue, Dept. 405 Bismarck, ND 58505	Paper Service	No	SPL_SL_9-1449_SPL_SL_9-1449_SPL_SL_9-1449_Interested Parties
Henry	Fischer	terry.grabau@ecorn.com	East Central Energy	412 North Main Braham, MN 550060039	Paper Service	No	SPL_SL_9-1449_SPL_SL_9-1449_SPL_SL_9-1449_Interested Parties
Lori	Frisk Thompson	lorift@utplus.com	Central Minnesota Municipal Power Agency	459 S Grove St Blue Earth, MN 56013	Electronic Service	No	SPL_SL_9-1449_SPL_SL_9-1449_SPL_SL_9-1449_Interested Parties
Edward	Garvey	garveyed@aol.com		32 Lawton Street St. Paul, MN 55102	Paper Service	No	SPL_SL_9-1449_SPL_SL_9-1449_SPL_SL_9-1449_Interested Parties

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Sherry	Gaugler	sherry.jcplaw@comcast.net	Jeffrey C. Paulson & Associates, Ltd.	Suite 325 7301 Ohms Lane Edina, MN 55439	Electronic Service	No	SPL_SL_9- 1449_SPL_SL_9- 1449_SPL_SL_9- 1449_Interested Parties
Greg	Geisler	N/A	Tenaska Power Services Co	1701 E Lamar Blvd Ste 100 Arlington, TX 76006	Paper Service	No	SPL_SL_9- 1449_SPL_SL_9- 1449_SPL_SL_9- 1449_Interested Parties
Darrell	Gerber		Clean Water Action Alliance of Minnesota	308 Hennepin Ave. E. Minneapolis, MN 55414	Paper Service	No	SPL_SL_9- 1449_SPL_SL_9- 1449_SPL_SL_9- 1449_Interested Parties
Bruce	Gerhardson	bgerhardson@ottertail.com	Otter Tail Corporation	PO Box 496 215 S Cascade St Fergus Falls, MN 565380496	Electronic Service	No	SPL_SL_9- 1449_SPL_SL_9- 1449_SPL_SL_9- 1449_Interested Parties
Ronald M.	Giteck	ron.giteck@state.mn.us	Office of the Attorney General-RUD	Residential Utilities Division 445 Minnesota Street, BRM Tower St. Paul, MN 55101	Paper Service	No	SPL_SL_9- 1449_SPL_SL_9- 1449_SPL_SL_9- 1449_Interested Parties
Julie	Goehring	N/A		708 70th Ave. NW Moorhead, MN 56560	Paper Service	No	SPL_SL_9- 1449_SPL_SL_9- 1449_SPL_SL_9- 1449_Interested Parties
Elizabeth	Goodpaster	bgoodpaster@mncenter.org	MN Center for Environmental Advocacy	Suite 206 26 East Exchange Street St. Paul, MN 551011667	Paper Service	No	SPL_SL_9- 1449_SPL_SL_9- 1449_SPL_SL_9- 1449_Interested Parties
William	Grant	bgrant@iwla.org	Izaak Walton League, Midwest Office	1619 Dayton Ave Ste 202 St. Paul, MN 551046206	Paper Service	No	SPL_SL_9- 1449_SPL_SL_9- 1449_SPL_SL_9- 1449_Interested Parties
Michael R.	Gravelle	michael.gravelle@avantenergy.com	Avant Energy Services	Suite 300 200 South Sixth Street Minneapolis, MN 55402	Paper Service	No	SPL_SL_9- 1449_SPL_SL_9- 1449_SPL_SL_9- 1449_Interested Parties

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Christopher	Greenman	ChristopherGreenman@excelsiorenergy.com	Excelsior Energy	10900 Wayzata Boulevard - Suite 200 Minnetonka, MN 55305	Paper Service	No	SPL_SL_9- 1449_SPL_SL_9- 1449_SPL_SL_9- 1449_Interested Parties
Pete	Grills			5414 Ashhurst Street Indianapolis, IN 46220	Paper Service	No	SPL_SL_9- 1449_SPL_SL_9- 1449_SPL_SL_9- 1449_Interested Parties
Lloyd W.	Grooms	lgrooms@winthrop.com	Winthrop & Weinstine	Suite 3500 225 South Sixth Street Minneapolis, MN 554024629	Paper Service	No	SPL_SL_9- 1449_SPL_SL_9- 1449_SPL_SL_9- 1449_Interested Parties
Todd J.	Guerrero	tguerrero@fredlaw.com	Fredrikson & Byron, P.A.	Suite 4000 200 South Sixth Street Minneapolis, MN 554021425	Electronic Service	No	SPL_SL_9- 1449_SPL_SL_9- 1449_SPL_SL_9- 1449_Interested Parties
Burl	Haar	burl.haar@state.mn.us	Public Utilities Commission	121 7th Place East Suite 350 St. Paul, MN 55101-2147	Electronic Service	No	SPL_SL_9- 1449_SPL_SL_9- 1449_SPL_SL_9- 1449_Interested Parties
Karen Finstad	Hammel	Karen.Hammel@state.mn.us	Office of the Attorney General-DOC	1400 BRM Tower 445 Minnesota Street St. Paul, MN 551012131	Paper Service	No	SPL_SL_9- 1449_SPL_SL_9- 1449_SPL_SL_9- 1449_Interested Parties
William	Harrington	williamh@excelsiorenergy.com	Excelsior Energy Inc.	Suite 200 10900 Wayzata Boulevard Minnetonka, MN 55305	Paper Service	No	SPL_SL_9- 1449_SPL_SL_9- 1449_SPL_SL_9- 1449_Interested Parties
Robert	Harris	rharris@wapa.gov	Western Area Power Administration	U.S. Dept. Of Energy 2900 4th Avenue North, PO Box 35800 Billings, MT 591075800	Paper Service	No	SPL_SL_9- 1449_SPL_SL_9- 1449_SPL_SL_9- 1449_Interested Parties
Richard	Haubensak	RICHARD.HAUBENSAK@CONSTELLATION.COM	Constellation New Energy Gas	Suite 200 12120 Port Grace Boulevard La Vista, NE 68128	Paper Service	No	SPL_SL_9- 1449_SPL_SL_9- 1449_SPL_SL_9- 1449_Interested Parties

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Gordon	Hauk	ghauk@ford.com	Ford Motor Company	330 Town Center Suite 1100 Dearborn, MI 48126	Paper Service	No	SPL_SL_9- 1449_SPL_SL_9- 1449_SPL_SL_9- 1449_Interested Parties
Bill	Heaney	billheaney@billheaney.com	IBEW Minnesota State Council	P. O. Box 65397 St. Paul, MN 551550397	Paper Service	No	SPL_SL_9- 1449_SPL_SL_9- 1449_SPL_SL_9- 1449_Interested Parties
John	Helmets	helmets.john@co.olmsted. mn.us	Olmsted County Waste to Energy	2122 Campus Drive SE Rochester, MN 559044744	Paper Service	No	SPL_SL_9- 1449_SPL_SL_9- 1449_SPL_SL_9- 1449_Interested Parties
Jacob	Hendricks, Esq.	jhendricks@felhaber.com	Felhaber, Lason, Fenlon & Vogt, P.A.	Suite 2200 220 South Sixth Street Minneapolis, MN 55402	Paper Service	Yes	SPL_SL_9- 1449_SPL_SL_9- 1449_SPL_SL_9- 1449_Interested Parties
Annete	Henkel	mui@mnuutilityinvestors.org	Minnesota Utility Investors	413 Wacouta Street #230 St. Paul, MN 55101	Paper Service	No	SPL_SL_9- 1449_SPL_SL_9- 1449_SPL_SL_9- 1449_Interested Parties
Shane	Henriksen	shane.henriksen@enbridge .com	Enbridge Energy Company, Inc.	1409 Hammond Ave FL 2 Superior, WI 54880	Electronic Service	No	SPL_SL_9- 1449_SPL_SL_9- 1449_SPL_SL_9- 1449_Interested Parties
Charlie	Higley	higley@wiscub.org	Citizens Utility Board	Suite 530 16 North Carroll Street Madison, WI 53703	Paper Service	No	SPL_SL_9- 1449_SPL_SL_9- 1449_SPL_SL_9- 1449_Interested Parties
Margaret	Hodnik	mhodnik@mnpower.com	Minnesota Power	30 West Superior Street Duluth, MN 55802	Electronic Service	No	SPL_SL_9- 1449_SPL_SL_9- 1449_SPL_SL_9- 1449_Interested Parties
Mark	Holsten	mark.holsten@dnr.state.mn .us	Department of Natural Resources	500 Lafayette Road St. Paul, MN 55155	Electronic Service	No	SPL_SL_9- 1449_SPL_SL_9- 1449_SPL_SL_9- 1449_Interested Parties
Tom	Holt	N/A	East River Electric Power Coop., Inc.	121 SE 1st St PO Drawer E Madison, SD 57042	Paper Service	No	SPL_SL_9- 1449_SPL_SL_9- 1449_SPL_SL_9- 1449_Interested Parties

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Ashley	Houston			120 Fairway Rd Chestnut Hill, MA 24671850	Paper Service	No	SPL_SL_9- 1449_SPL_SL_9- 1449_SPL_SL_9- 1449_Interested Parties
Casey	Jacobson	cjacobson@bepc.com	Basin Electric Power Cooperative	1717 East Interstate Avenue Bismarck, ND 58501	Paper Service	No	SPL_SL_9- 1449_SPL_SL_9- 1449_SPL_SL_9- 1449_Interested Parties
Arshia	Javaherian	arshiajavaherian@alliantenergy.com	Interstate Power and Light.	PO Box 351 Cedar Rapids, IA 524060351	Paper Service	No	SPL_SL_9- 1449_SPL_SL_9- 1449_SPL_SL_9- 1449_Interested Parties
Alan	Jenkins	aj@jenkinsatlaw.com	Jenkins at Law, LLC	Suite 100 2265 Roswell Road Marietta, GA 30062	Paper Service	No	SPL_SL_9- 1449_SPL_SL_9- 1449_SPL_SL_9- 1449_Interested Parties
Linda S.	Jensen	linda.s.jensen@state.mn.us	Office of the Attorney General-DOC	1400 BRM Tower 445 Minnesota Street St. Paul, MN 551012131	Electronic Service	No	SPL_SL_9- 1449_SPL_SL_9- 1449_SPL_SL_9- 1449_Interested Parties
Paula N.	Johnson		Interstate Power and Light Company	200 First Street SE PO Box 351 Cedar Rapids, IA 524060351	Paper Service	No	SPL_SL_9- 1449_SPL_SL_9- 1449_SPL_SL_9- 1449_Interested Parties
Richard	Johnson	johnsonr@moss-barnett.com	Moss & Barnett	4800 Wells Fargo Center90 South Seventh Street Minneapolis, MN 55402	Paper Service	No	SPL_SL_9- 1449_SPL_SL_9- 1449_SPL_SL_9- 1449_Interested Parties
Larry	Johnston	lw.johnston@smmpa.org	Southern Minnesota Municipal Power Agency	500 1st Ave SW Rochester, MN 55902-3303	Paper Service	No	SPL_SL_9- 1449_SPL_SL_9- 1449_SPL_SL_9- 1449_Interested Parties
Nate	Jones	njones@hcpd.com	Heartland Consumers Power	PO Box 248 Madison, SD 57042	Electronic Service	No	SPL_SL_9- 1449_SPL_SL_9- 1449_SPL_SL_9- 1449_Interested Parties

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Jeremy	Kalin		MN House	100 Rev Dr. Martin Luther King, #579 St. Paul, MN 55101	Paper Service	No	SPL_SL_9-1449_SPL_SL_9-1449_SPL_SL_9-1449_Interested Parties
Nancy	Kelly	nkelly@greeninstitute.org	The Green Institute	#110 2801 21st Avenue Minneapolis, MN 55407	Electronic Service	No	SPL_SL_9-1449_SPL_SL_9-1449_SPL_SL_9-1449_Interested Parties
Julie	Ketchum		Waste Management	1901 Ames Drive Burnsville, MN 55306	Paper Service	No	SPL_SL_9-1449_SPL_SL_9-1449_SPL_SL_9-1449_Interested Parties
Nico	Kieves		Excelsior Energy Inc.	Suite 305 11100 Wayzata Boulevard Minnetonka, MN 55305	Paper Service	No	SPL_SL_9-1449_SPL_SL_9-1449_SPL_SL_9-1449_Interested Parties
John A.	Knapp	jknappp@winthrop.com	Winthrop & Weinstine	Suite 3500 225 South Sixth Street Minneapolis, MN 554024629	Paper Service	No	SPL_SL_9-1449_SPL_SL_9-1449_SPL_SL_9-1449_Interested Parties
John	Knofczynski		Heartland Consumers Power District	PO Box 248 203 W. Center Street Madison, SD 570420248	Paper Service	No	SPL_SL_9-1449_SPL_SL_9-1449_SPL_SL_9-1449_Interested Parties
Gerald P.	Kohanski	gpkohanski@cleveland-cliffs.com	Cleveland-Cliffs Inc.	Suite 1500 1100 Superior Avenue Cleveland, OH 441142518	Paper Service	No	SPL_SL_9-1449_SPL_SL_9-1449_SPL_SL_9-1449_Interested Parties
Heidi	Konynenbelt	hkonynenbelt@otpc.com	Otter Tail Power Company	215 S. Cascade Street, PO Box 496 Fergus Falls, MN 565380496	Electronic Service	No	SPL_SL_9-1449_SPL_SL_9-1449_SPL_SL_9-1449_Interested Parties
Larry J.	Koshire		Rochester Public Utilities	4000 East River Road NE Rochester, MN 559062813	Paper Service	No	SPL_SL_9-1449_SPL_SL_9-1449_SPL_SL_9-1449_Interested Parties

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Randy	Kramer		Water and Soil Resources Board	1501 Second Avenue South Wheaton, MN 56296	Paper Service	No	SPL_SL_9-1449_SPL_SL_9-1449_SPL_SL_9-1449_Interested Parties
Michael	Krikava	mkrikava@briggs.com	Briggs And Morgan, P.A.	2200 IDS Center80 South 8th Street Minneapolis, MN 55402	Electronic Service	No	SPL_SL_9-1449_SPL_SL_9-1449_SPL_SL_9-1449_Interested Parties
Jeffrey L.	Landsman	jlandsman@wheelerlaw.com	Wheeler, Van Sickle & Anderson, S.C.	Suite 801 25 West Main Street Madison, WI 537033398	Paper Service	No	SPL_SL_9-1449_SPL_SL_9-1449_SPL_SL_9-1449_Interested Parties
Douglas	Larson	dlarson@dakotaelectric.com	Dakota Electric Association	4300 220th St W Farmington, MN 55024	Paper Service	No	SPL_SL_9-1449_SPL_SL_9-1449_SPL_SL_9-1449_Interested Parties
James D.	Larson		Avant Energy Services	200 S 6th St Ste 300 Minneapolis, MN 55402	Paper Service	No	SPL_SL_9-1449_SPL_SL_9-1449_SPL_SL_9-1449_Interested Parties
Robert S	Lee	RSL@MCMLAW.COM	Mackall Crouse & Moore Law Offices	1400 AT&T Tower 901 Marquette Ave Minneapolis, MN 554022859	Paper Service	No	SPL_SL_9-1449_SPL_SL_9-1449_SPL_SL_9-1449_Interested Parties
Mark	Lindquist		The Minnesota Project	1026 North Washington Street New Ulm, MN 56073	Paper Service	No	SPL_SL_9-1449_SPL_SL_9-1449_SPL_SL_9-1449_Interested Parties
Michael	Loeffler		Northern Natural Gas Co.	CORP HQ, 714 1111 So. 103rd Street Omaha, NE 681241000	Paper Service	No	SPL_SL_9-1449_SPL_SL_9-1449_SPL_SL_9-1449_Interested Parties
Sanne	Magnan		Minnesota Department of Health	P.O. Box 64975 St. Paul, MN 55164-0975	Paper Service	No	SPL_SL_9-1449_SPL_SL_9-1449_SPL_SL_9-1449_Interested Parties

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Kavita	Maini	kmaini@wi.rr.com	KM Energy Consulting LLC	961 N Lost Woods Rd Oconomowoc, WI 53066	Paper Service	No	SPL_SL_9- 1449_SPL_SL_9- 1449_SPL_SL_9- 1449_Interested Parties
Pam	Marshall	pam@energycents.org	Energy CENTS Coalition	823 7th St E St. Paul, MN 55106	Paper Service	No	SPL_SL_9- 1449_SPL_SL_9- 1449_SPL_SL_9- 1449_Interested Parties
Susan	McCarville			58 Harrison Ave S Hopkins, MN 55343	Paper Service	No	SPL_SL_9- 1449_SPL_SL_9- 1449_SPL_SL_9- 1449_Interested Parties
Mike	McDowell		Heartland Consumers Power District	PO Box 248 Madison, SD 570420248	Paper Service	No	SPL_SL_9- 1449_SPL_SL_9- 1449_SPL_SL_9- 1449_Interested Parties
Dave	McNary		Hennepin County DES	417 N. Fifth Street Minneapolis, MN 55401	Paper Service	No	SPL_SL_9- 1449_SPL_SL_9- 1449_SPL_SL_9- 1449_Interested Parties
John	McWilliams	jmm@dairynet.com	Dairyland Power Cooperative	3200 East Ave SPO Box 817 La Crosse, WI 54601-7227	Paper Service	No	SPL_SL_9- 1449_SPL_SL_9- 1449_SPL_SL_9- 1449_Interested Parties
Clair	Moeller		Midwest ISO	1125 Energy Park Drive St. Paul, MN 551085001	Paper Service	No	SPL_SL_9- 1449_SPL_SL_9- 1449_SPL_SL_9- 1449_Interested Parties
David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022093	Electronic Service	No	SPL_SL_9- 1449_SPL_SL_9- 1449_SPL_SL_9- 1449_Interested Parties
John	Moir	N/A	City of Minneapolis	City Hall Rm 301 M 350 South 5th Street Minneapolis, MN 55415-1376	Paper Service	No	SPL_SL_9- 1449_SPL_SL_9- 1449_SPL_SL_9- 1449_Interested Parties
Andrew	Moratzka	apm@mcmlaw.com	Mackall, Crouse and Moore	1400 AT&T Tower 901 Marquette Ave Minneapolis, MN 55402	Paper Service	No	SPL_SL_9- 1449_SPL_SL_9- 1449_SPL_SL_9- 1449_Interested Parties

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
K Frank	Morehouse	N/A	Great Plains Natural Gas Company	PO Box 176 Fergus Falls, MN 56537-0176	Paper Service	No	SPL_SL_9- 1449_SPL_SL_9- 1449_SPL_SL_9- 1449_Interested Parties
Katie	Nekola		Clean Wisconsin	Suite 200 122 State Street Madison, WI 53703	Paper Service	No	SPL_SL_9- 1449_SPL_SL_9- 1449_SPL_SL_9- 1449_Interested Parties
Peter J.	Nelson		Center of the American Experiment	Suite 1024 12 South Sixth Street Minneapolis, MN 55402	Paper Service	No	SPL_SL_9- 1449_SPL_SL_9- 1449_SPL_SL_9- 1449_Interested Parties
Thomas L.	Osteraas	tomosteraas@excelsiorenergy.com	Excelsior Energy	10900 Wayzata Blvd Ste 200 Minnetonka, MN 55305	Paper Service	No	SPL_SL_9- 1449_SPL_SL_9- 1449_SPL_SL_9- 1449_Interested Parties
Greg	Oxley		MMUA	Suite 400 3025 Harbor Lane North Plymouth, MN 554475142	Paper Service	No	SPL_SL_9- 1449_SPL_SL_9- 1449_SPL_SL_9- 1449_Interested Parties
Mary Beth	Peranteau	mperanteau@wheelerlaw.com	Wheeler Van Sickle & Anderson SC	Suite 801 25 West Main Street Madison, WI 537033398	Paper Service	No	SPL_SL_9- 1449_SPL_SL_9- 1449_SPL_SL_9- 1449_Interested Parties
William	Pickrell		North American Hydro	PO Box 167 116 State Street Neshkoro, WI 54941	Paper Service	No	SPL_SL_9- 1449_SPL_SL_9- 1449_SPL_SL_9- 1449_Interested Parties
Clifford	Porter	N/A	Lignite Research Council	1016 E Owens Ave Ste 200 PO Box 2277 Bismarck, ND 58502	Paper Service	No	SPL_SL_9- 1449_SPL_SL_9- 1449_SPL_SL_9- 1449_Interested Parties
Curt	Punt		Western MN Municipal Power Agency	Suite 102 25 2nd Street NW Ortonville, MN 56278	Paper Service	No	SPL_SL_9- 1449_SPL_SL_9- 1449_SPL_SL_9- 1449_Interested Parties
Kent	Ragsdale	kentragsdale@alliantenergy.com	Alliant Energy-Interstate Power and Light Company	P.O. Box 351 200 First Street, SE Cedar Rapids, IA 524060351	Paper Service	No	SPL_SL_9- 1449_SPL_SL_9- 1449_SPL_SL_9- 1449_Interested Parties

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Sheila	Reger	N/A		200 Administration Bldg St. Paul, MN 55155	Paper Service	No	SPL_SL_9- 1449_SPL_SL_9- 1449_SPL_SL_9- 1449_Interested Parties
John C.	Reinhardt		Laura A. Reinhardt	3552 26Th Avenue South Minneapolis, MN 55406	Paper Service	No	SPL_SL_9- 1449_SPL_SL_9- 1449_SPL_SL_9- 1449_Interested Parties
Trudy	Richter	trichter@rranow.com	Minnesota Resource Recovery Assn.	477 Selby Avenue St. Paul, MN 55102	Paper Service	No	SPL_SL_9- 1449_SPL_SL_9- 1449_SPL_SL_9- 1449_Interested Parties
Robert K.	Sahr	bsahr@eastriver.coop	East River Electric Power Cooperative	P.O. Box 227 Madison, SD 57042	Electronic Service	No	SPL_SL_9- 1449_SPL_SL_9- 1449_SPL_SL_9- 1449_Interested Parties
Raymond	Sand	rms@dairynet.com	Dairyland Power Cooperative	P.O. Box 8173200 East Avenue South LaCrosse, WI 546020817	Electronic Service	No	SPL_SL_9- 1449_SPL_SL_9- 1449_SPL_SL_9- 1449_Interested Parties
Steve	Sanda			101 Park Circle Otertail City, MN 565717003	Paper Service	No	SPL_SL_9- 1449_SPL_SL_9- 1449_SPL_SL_9- 1449_Interested Parties
Christopher	Sandberg	cksandberg@locklaw.com	LOCKRIDGE GRINDAL NAUEN PLLP	Suite 2200100 Washington Avenue South Minneapolis, MN 55401	Electronic Service	No	SPL_SL_9- 1449_SPL_SL_9- 1449_SPL_SL_9- 1449_Interested Parties
Michael	Sarafolean	MSarafolean@gerdauameri steel.com	Gerdau Ameristeel US, Inc.	4221 W Boy Scout Blvd Ste 600 Tampa, FL 33607	Paper Service	No	SPL_SL_9- 1449_SPL_SL_9- 1449_SPL_SL_9- 1449_Interested Parties
Richard	Savelkoul	rsavelkoul@felhaber.com	Felhaber, Larson, Fenton & Vogt, P.A.	444 Cedar St Ste 2100 St. Paul, MN 55101-2136	Paper Service	No	SPL_SL_9- 1449_SPL_SL_9- 1449_SPL_SL_9- 1449_Interested Parties

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Larry L.	Schedin	Larry@LLSResources.com	LLS Resources, LLC	12 S 6th St Ste 1137 Minneapolis, MN 55402	Paper Service	No	SPL_SL_9- 1449_SPL_SL_9- 1449_SPL_SL_9- 1449_Interested Parties
Matthew J.	Schuerger P.E.		Energy Systems Consulting Services, LLC	P.O. Box 16129 St. Paul, MN 55116	Paper Service	No	SPL_SL_9- 1449_SPL_SL_9- 1449_SPL_SL_9- 1449_Interested Parties
Robert H.	Schulte	rhs@schulteassociates.com	Schulte Associates LLC	15347 Boulder Pointe Road Eden Prairie, MN 55347	Paper Service	No	SPL_SL_9- 1449_SPL_SL_9- 1449_SPL_SL_9- 1449_Interested Parties
Dean	Sedgwick		Itasca Power Company	PO Box 457 Spring Lake, MN 566800457	Paper Service	No	SPL_SL_9- 1449_SPL_SL_9- 1449_SPL_SL_9- 1449_Interested Parties
John	Senseman		EVTAC Meeting	P.O. Box 180 Eveleth, MN 55734	Paper Service	No	SPL_SL_9- 1449_SPL_SL_9- 1449_SPL_SL_9- 1449_Interested Parties
Mrg	Simon	mrgsimon@mrenergy.com	Missouri River Energy Services	3724 W. Avera Drive P.O. Box 88920 Sioux Falls, SD 571098920	Electronic Service	No	SPL_SL_9- 1449_SPL_SL_9- 1449_SPL_SL_9- 1449_Interested Parties
Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.	76 W Kellogg Blvd St. Paul, MN 55102	Electronic Service	No	SPL_SL_9- 1449_SPL_SL_9- 1449_SPL_SL_9- 1449_Interested Parties
Beth H.	Soholt	bsoholt@windonthewires.org	Wind on the Wires	Suite 203 1619 Dayton Avenue St. Paul, MN 551046206	Paper Service	No	SPL_SL_9- 1449_SPL_SL_9- 1449_SPL_SL_9- 1449_Interested Parties
Dale	Sollom	dsollom@minnkota.com	Minnkota Power Cooperative, Inc.	PO Box 13200 Grand Forks, ND 582083200	Electronic Service	No	SPL_SL_9- 1449_SPL_SL_9- 1449_SPL_SL_9- 1449_Interested Parties
Tom	Sorel	N/A		MN Dept of Transportation 395 John Ireland Blvd St. Paul, MN 55155	Paper Service	No	SPL_SL_9- 1449_SPL_SL_9- 1449_SPL_SL_9- 1449_Interested Parties

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
David	Strom	davids@mnfmi.org	Minnesota Free Market Institute	P.O. Box 120449 St. Paul, MN 55112	Paper Service	No	SPL_SL_9-1449_SPL_SL_9-1449_SPL_SL_9-1449_Interested Parties
Sheldon	Strom		Center For Energy And Environment	212 3rd Ave N Ste 560 Minneapolis, MN 554011459	Paper Service	No	SPL_SL_9-1449_SPL_SL_9-1449_SPL_SL_9-1449_Interested Parties
James M.	Strommen	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered	470 U.S. Bank Plaza 200 South Sixth Street Minneapolis, MN 55402	Paper Service	No	SPL_SL_9-1449_SPL_SL_9-1449_SPL_SL_9-1449_Interested Parties
Eric	Swanson	eswanson@winthrop.com	Winthrop & Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Paper Service	No	SPL_SL_9-1449_SPL_SL_9-1449_SPL_SL_9-1449_Interested Parties
Sandi	Tabor	SandiTabor@lignite.com	North Dakota Transmission Authority	P.O. Box 22771016 East Owens Avenue Bismarck, ND 585022277	Paper Service	No	SPL_SL_9-1449_SPL_SL_9-1449_SPL_SL_9-1449_Interested Parties
James R.	Talcott		Northern Natural Gas Company	1111 South 103rd Street Omaha, NE 68124	Paper Service	No	SPL_SL_9-1449_SPL_SL_9-1449_SPL_SL_9-1449_Interested Parties
Steve	Thompson		Central Minnesota Municipal Power Agency	459 S Grove St Blue Earth, MN 56013-2629	Paper Service	No	SPL_SL_9-1449_SPL_SL_9-1449_SPL_SL_9-1449_Interested Parties
SaGonna	Thompson	Regulatory.Records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	No	SPL_SL_9-1449_SPL_SL_9-1449_SPL_SL_9-1449_Interested Parties
David	Thornton		MN Pollution Control Agency	520 Lafayette Road St. Paul, MN 55101	Paper Service	No	SPL_SL_9-1449_SPL_SL_9-1449_SPL_SL_9-1449_Interested Parties
Mona	Tierney-Lloyd	mtierney-lloyd@enemoc.com	EnerNoc Inc	P. O. Box 378 Cayucos, CA 93430	Paper Service	No	SPL_SL_9-1449_SPL_SL_9-1449_SPL_SL_9-1449_Interested Parties

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Darryl	Tveitbakk		Northern Municipal Power Agency	123 Second Street West Thief River Falls, MN 56701	Paper Service	No	SPL_SL_9- 1449_SPL_SL_9- 1449_SPL_SL_9- 1449_Interested Parties
Lisa	Veith		City of St. Paul	400 City Hall and Courthouse 15 West Kellogg Blvd. St. Paul, MN 55102	Paper Service	No	SPL_SL_9- 1449_SPL_SL_9- 1449_SPL_SL_9- 1449_Interested Parties
Michael J.	Vickerman		Renew Wisconsin	222 South Hamilton Street Madison, WI 53703	Paper Service	No	SPL_SL_9- 1449_SPL_SL_9- 1449_SPL_SL_9- 1449_Interested Parties
Roger	Warehime	warehimer@owatonnautilities.com	Owatonna Public Utilities	208 South Walnut PO Box 800 Owatonna, MN 55060	Paper Service	No	SPL_SL_9- 1449_SPL_SL_9- 1449_SPL_SL_9- 1449_Interested Parties
Paul	White	paul@projectresources.net	Project Resources Corp.	618 Second Avenue SE Minneapolis, MN 55414	Paper Service	No	SPL_SL_9- 1449_SPL_SL_9- 1449_SPL_SL_9- 1449_Interested Parties
Wade	Worthy	lworthy@marathonoil.com	Marathon Petroleum Company LLC	PO Box 3128 Houston, TX 77253	Paper Service	No	SPL_SL_9- 1449_SPL_SL_9- 1449_SPL_SL_9- 1449_Interested Parties