

July 8, 2014

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

RE: **Supplemental Response Comments of the Minnesota Department of Commerce,  
Division of Energy Resources**  
Docket No. E017/M-14-201

Dear Dr. Haar:

Attached are the supplemental response comments of the Minnesota Department of Commerce, Division of Energy Resources (Department) to the reply comments of Otter Tail Power Company (Otter Tail or the Company) in the following matter:

    Otter Tail Power Company's 2013 Demand Side Management Financial Incentive and Annual Filing to Update the Conservation Improvement (CIP) Rider.

The petition was filed on April 1, 2014. The Department filed its initial comments on May 1, 2014 and response comments on May 23rd. On May 30th, the Minnesota Chamber of Commerce (Chamber) filed comments. Otter Tail filed response comments to the Chamber's comments on June 12, 2014.

After reviewing the Chamber's reply comments and OTP's response comments, the Department has developed an additional recommendation. The Department continues to recommend that the Commission **approve Otter Tail's petition, with modifications**, and is available to answer any questions the Minnesota Public Utilities Commission may have.

Sincerely,

/s/ JOHN KUNDERT  
Financial Analyst

JK/lt  
Attachment



## BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

### SUPPLEMENTAL RESPONSE COMMENTS OF THE MINNESOTA DEPARTMENT OF COMMERCE

DOCKET NO. E017/M-14-201

#### I. BACKGROUND

On April 1, 2014, Otter Tail Power Company (Otter Tail, OTP or the Company) filed its *Demand Side Management (DSM) Financial Incentive, Conservation Improvement Program (CIP) Rider Update, and Conservation Cost Recovery Reports*. On May 1, 2014, the Minnesota Department of Commerce, Division of Energy Resource (Department or DOC) filed comments concluding that Otter Tail correctly calculated its CIP Tracker account and 2013 financial incentive. However, the Department expressed concern that the Company's proposed Conservation Cost Recovery Adjustment (CCRA) rate would result in a large tracker balance, which would impose an unnecessary level of carrying charges on ratepayers. The Department recommended that the Minnesota Public Utilities Commission (Commission) set OTP's CCRA a \$0.00350/kWh to reduce the tracker balance to \$892,603 by December 31, 2015.

Because Otter Tail indicated a concern regarding rate shock in the event of a dramatic increase in the CCRA, the Department requested that Otter Tail discuss in reply comments whether it would be reasonable to delay booking the Company's financial incentive in order to help reduce the carrying charges imposed on its customers.

In its May 16, 2014 reply comments, Otter Tail addressed two issues 1) the amount of the CCRA in balance with customer bill impacts and 2) the timing of when the financial incentive is booked in the CIP tracker. Otter Tail proposed a slightly higher CCRA of \$0.00263/kWh rather than their originally proposed level of \$0.00209/kWh, effective July 1, 2014. As for the timing of when the financial incentive is booked, the Company recommended that the financial incentive be booked in its entirety in the month it is approved by the Commission.

Instead, Otter Tail provided an analysis that supported its position that its "stepped" approach of increasing the CCRA to \$0.00263/kWh on July 1, 2014 and then to \$0.00280/kWh effective July 1, 2015, provides a more reasonable balance between the need to decrease the level of the existing under-recovery in the CIP Tracker and the impact of the increase in the CCRA on customer bills. The Company's updated analysis estimated a CIP Tracker balance of \$19,033 under-recovered effective June 30, 2016 using its approach.

Otter Tail noted in its reply comments that the Department's proposed CCRA would increase an average residential customer's bill by 1.73 percent and a large business or school's bill by 2.82 percent. The Company also calculated that the Department's proposed CCRA would increase an average Interruptible Load customer's bill by 3.40 percent.

The Department recommended in its response comments that the Commission:

- approve Otter Tail's CIP tracker account, as summarized in Table 1 of the Department's May 1, 2014 comments;
- approve an incentive of \$4,026,600 for Otter Tail's 2013 CIP achievements;
- grant Otter Tail a variance to Minnesota Rules part 7820.3500 (K) and a variance to Minnesota Rules part 7825.2600 for one year after the issue date of the Commission's Order in the present docket;
- adopt a CCRA of \$0.00350/kWh effective July 1, 2014; and
- approve OTP's request to book its 2013 financial incentive in the month following Commission approval.

On May 30th, the Minnesota Chamber of Commerce (Chamber) filed comments recommending that the Commission:

- Set the CCRA at \$0.00209/kWh.
- Modify the current practice of allowing Otter Tail to charge a carrying cost equal to its average weighted cost of capital on the CIP tracker balance such that OTP would not calculate a carrying charge on the CIP tracker balance, or that the Company be allowed to recover a carrying charge equal to its short-term cost of debt.
- Allow the existing CIP tracker balance to be recovered over a longer time period.

Otter Tail filed response comments to the Chamber's comments on June 12, 2014. Otter Tail provided additional support for its position and recommended that the Commission allow the Company to:

- Implement a CCRA of \$0.00263/kWh.
- Continue to assess a carrying charge based on its average weighted cost of capital on its CIP tracker balance; and
- Book the entire 2013 financial incentive in the CIP tracker in month following the Commission's order.

## II. ANALYSIS

### A. CARRYING CHARGE ON CIP TRACKER

#### 1. Background

The Chamber in its reply comments stated “there should be no carrying costs since the utility is not incurring any risk in receiving the incentive, nor are dollars being held up to pay for CIP expenditures.” The Chamber also recommended that no carrying cost should be calculated for the CIP tracker or the Company should use its cost of short-term debt in *lieu* of its currently approved average weighted cost of capital in the calculation of the carrying charge.

OTP noted in its response comments that the Commission approved the concept of a carrying charge on the CIP tracker balance in 1992 and that all Minnesota utilities currently use their respective rate of return for this purpose. The Company also noted that the treatment of the tracker balance is symmetrical as well.

The Department notes that the Commission made a decision regarding carrying charges earlier this year in Docket No. E017/M-13-103. In its March 10, 2014 Order in that docket the Commission stated at page 9:<sup>1</sup>

In Otter Tail’s last renewable energy rider docket, the Commission requested that the Company explain, in its next rider filing of any type, why the inclusion of a carrying charge imposed on a rider tracker balance is justified. The Company responded to the Commission’s request in this docket by stating that a rider reflects either an over- or under-recovery of the tracker balance and the carrying charge provides symmetrical interest treatment in both instances.

Having considered the issue, the Commission will not allow the Company to add a carrying charge to the tracker balance for its transmission recovery rider and its renewable resource cost recovery rider. While the Company’s observation about symmetrical interest treatment is true, it does not go to the heart of the issue. As discussed above, the TCR (Transmission Cost Recovery) rider and the renewable resource cost recovery rider are extraordinary cost-recovery mechanisms adopted to expedite the construction of critically needed infrastructure.

They offer unique advantages over traditional ratemaking treatment. For example, they permit cost recovery – including recovery of the authorized rate of return – to begin with

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<sup>1</sup> Footnote omitted.

construction, instead of when the facilities are placed into service. And both riders permit cost recovery to begin before the facilities' costs have been fully scrutinized in a rate case. The additional advantages of a carrying charge are therefore unnecessary either to ensure fairness or to act as an incentive.

For these reasons, the Commission will not permit carrying charges on either rider.

### 2. Application of Carrying Charges for Different Riders

After reviewing the Chamber's and the Company's comments on this issue, the Department concludes that it is reasonable to apply the rationale developed in the Commission's Order to the CIP tracker. Consequently, the Department developed Table 1 below.

**Table 1 – Comparison of Rider Characteristics for Transmission Cost Recovery (TCR), Renewable Resource Cost Recovery (RRCR), and Conservation Improvement Program Riders**

| Description   | Transmission Cost Recovery | Energy | Conservation Improvement Program |
|---|----------------------------|--------|----------------------------------|
| Extraordinary Cost Recovery Mechanism                         | Yes                        | Yes    | Yes                              |
| Permits Utility to earn a return before plant is in-service   | Yes                        | Yes    | No                               |
| Permits cost recovery before cost have been fully scrutinized | Yes                        | Yes    | Yes, to a limited extent         |
| Includes an incentive mechanism                               | No                         | No     | Yes                              |
| Allows utility to assess a carrying charge on tracker balance | No                         | No     | Yes                              |

Using the TCR and RRCR riders as a point of comparison, the Commission's treatment of the CIP tracker is fairly generous in that it allows the utility to earn a large incentive on its CIP achievements (from 2010-2012 OTP's CIP incentive averaged 62 percent of its program costs) and it also allows the utility to assess a carrying charge on its tracker balance. This comparison suggests that the Chamber's recommendation to discontinue applying a carrying charge on the tracker balance in light of the Commission's recent decision in Docket No. E017/M-13-103 is appropriate. Consequently, the Department supports the Chamber's recommendation to discontinue approving carrying charges for under or over recovered balances in OTP's CIP tracker account.

### 3. Carrying Charge Level

The Chamber also recommended in its comments that if the Commission decided to allow OTP to continue charging its customers a carrying charge on the CIP tracker balance, such a

carrying charge should be set at the Company's rate for short-term debt, not its average weighted cost of capital as is currently the case. The Chamber did not provide specific support for this contingent recommendation; however, the cost of short-term debt would generally be expected to be lower than the overall rate of return.

Similar to the Department's investigation of the Chamber's primary recommendation regarding the carrying charge on the CIP tracker, the Department reviewed the components of OTP's CIP tracker in an attempt to determine if clear support existed for the use of either the average weighted cost of capital or the cost of short-term debt in the carrying charge calculation.

In its response comments to the Chamber, the Company included this passage from a Commission Order from a docket that began in 1991, Docket No. E-017/M-91-457 dated March 12, 1992, regarding the history of the carrying charge:

The Commission agrees with all parties that it is appropriate for the Company to begin adding a carrying charge to its CIP tracker account. The purpose of the CIP tracker account is to ensure complete recovery of actual CIP expenditures, as opposed to the classic ratemaking approach of limiting recovery to representative test year expenses. Allowing carrying charges is consistent with this purpose, **since carrying charges will compensate the Company for the time value of money invested in the CIP projects.** [Emphasis added.]

The Department added the emphasis to the last phrase in the quote to highlight the Commission's intent to allow carrying charges on CIP investments. The Commission did not address whether it was appropriate to apply carrying charges on CIP financial incentives.

There is a clear distinction between an investment and an incentive. Webster's on-line dictionary defines incentive as: "something that incites or has a tendency to incite to determination or action." It defines an investment as "the outlay of money usually for income or profit." Therefore, an incentive is not an investment. Consequently, and consistent with the Commission's decision to "compensate the Company for . . . money invested in the CIP projects," the Department concludes that it is inappropriate for the Otter Tail to receive a carrying charge on an incentive payment given the utility to invest in conservation. As a result, the Department recommends that in the event that the Commission continues to allow the application of carrying charges to the over and under recovery of CIP tracker accounts, that the carrying charge not be applied to the Company's financial incentive.

In addition, a material change in facts has occurred since the Commission's Order above was issued. According to information contained in page 7 of the Commission's Order in Docket No. E-017/M-91-457, OTP's financial incentive was \$23,714. By contrast, as noted above, OTP's most recent financial incentive was \$4,026,000, an increase of over \$4 million, or 16,880 percent higher than in 1992. In other words, there were few options

available to encourage CIP in 1992, whereas there are currently more significant options available to encourage utilities to invest in CIP.

If the Commission decides to allow OTP to continue to charge its customers a carrying charge on the CIP tracker, the question becomes what carrying charge accurately identifies the time value of money the Company has invested in CIP program?

The Department cannot identify a threshold decision criterion for making this determination. Otter Tail mentioned in its response comments that the Company is required to make cash working capital available to cover the outstanding tracker balance and that cash working capital is a component of utility rate base. However, one could argue that any over or under-recovery of the CIP tracker balance should be a short-lived phenomenon that is correspondingly financed with short-term debt. In addition, it would appear that lowering the carrying charge to the Company's cost of short-term debt would provide an incentive for the Company to minimize the CIP tracker balance over time.

Given that the Department's charge is to protect ratepayers' interests and in light of the absence of an identifiable advantage to either of these alternatives, the Department recommends that this carrying charge should be based on the Company's short-term cost of debt, if the Commission chooses to allow OTP to charge any carrying charge on its tracker balance.

#### *4. Delaying Recovery of 2013 Incentive*

As noted above, the Department's initial comments asked that Otter Tail address the reasonableness of delaying recovery of the Company's 2013 financial incentive. The Chamber recommended that OTP be required to delay the timing of the recovery of the financial incentive. In its reply comments, Otter Tail cited the complications associated with a multi-year recovery period. While the Department's suggested delay was limited to 12 months, we note that the existence of the tracker essentially defines these CIP costs as requiring accelerated recovery. Consequently, absent agreement by the Company to delay booking its 2013 financial incentive to ease the financial impact of this increase in the CCRA on its customers, the Department concludes that current public policy allows Otter Tail to book the incentive in the manner they propose.

#### *B. APPROPRIATE LEVEL FOR THE CCRA*

The Chamber mentioned two additional increases in charges collected through OTP riders – the TCR rider and the Environmental Cost Recovery Rider (ECRR). The Chamber identified a potential 273 percent increase in the TCR rate factor and an increase of 4 percent in base rates due to the introduction of the ECRR. The Chamber did not provide any customer bill impacts in its reply comments.

The Department developed a customer bill impact analysis to determine the combined effect of the CCRA, TCR and ECRR. The Department's analysis identified the following bill impacts for the three customer classes modeled.

**Table 2 – Customer Bill Impact Resulting from Approved or Proposed Changes in CCRA, TCR and ECRR Since January 1, 2014**  
**Assumes CCRA = \$0.0035/kWh, October – May Rates**

| Class            | Nominal Increase in Avg. Monthly Bill | Percentage Increase in Avg. Monthly Bill |
|------------------|---------------------------------------|--|
| Residential      | \$ 7.02                               | 8.8%                                     |
| Small Commercial | \$21.21                               | 9.4%                                     |
| Large Commercial | \$972.21                              | 7.9%                                     |

The Department currently supports a CCRA of \$0.0035/kWh, to reduce the tracker balance below \$1 million by December, 2015. <sup>2</sup> The potential monthly rate increases illustrated in Table 2 would result from the combined increases in the EERC (approved), CCRA (proposed), and TCR (proposed) are much higher than the 1.74 percent average CCRA-only increase due to “medium” CCRA recommended by the Department, as the Department calculated in its Comments in this proceeding. While the Department is not pre-judging the merits of OTP’s proposed increase in the TCR, a combined rate increase of this magnitude over a period of less than twelve months would present a very different picture of the extent to which ratepayers will need to manage their usage and bills.

Table 3 presents the same information assuming the Company’s originally proposed CCRA. The nominal and percentage increases associated with this level of the CCRA are still well above the nominal and percentage increases the Department identified in the analysis it provided with its comments on May 1. The Chamber supports the implementation of this lower CCRA.

**Table 3 – Customer Bill Impact Resulting from Approved or Proposed Changes in CCRA, TCR and ECRR Since January 1, 2014**  
**Assumes CCRA @ \$0.00209/kWh, October – May Rates**

| Class            | Nominal Increase in Avg. Monthly Bill | Percentage Increase in Avg. Monthly Bill |
|------------------|---------------------------------------|--|
| Residential      | \$ 5.85                               | 7.3%                                     |
| Small Commercial | \$17.49                               | 7.8%                                     |
| Large Commercial | \$674.65                              | 5.5%                                     |

<sup>2</sup> The Department’s May 27, 2014 Reply Comments inaccurately stated at page 2 that a rate of \$0.0035/kWh would reduce the tracker balance below \$1 million by June, 2015. To be clear, our recommendation continues to support the medium proposal described on page 6 of our May 1, 2014 Comments, which is a CCRA of \$0.0035/kWh projected to reduce the balance below \$1 million by December 2015.



Table 4 presents the same information presented in Table 3 assuming the Company's revised proposed CCRA.

**Table 4 – Customer Bill Impact Resulting from Approved or Proposed Changes in CCRA, TCR and ECRR Since January 1, 2014  
Assumes CCRA @ \$0.00263/kWh, October – May Rates**

| Class            | Nominal Increase in Avg. Monthly Bill | Percentage Increase in Avg. Monthly Bill |
|------------------|---------------------------------------|--|
| Residential      | \$ 6.30                               | 7.9%                                     |
| Small Commercial | \$18.91                               | 8.4%                                     |
| Large Commercial | \$788.61                              | 6.4%                                     |

The Department recommends that the Commission adopt the Company's proposed CCRA of \$0.0264/kWh for two reasons. First, the Department is recommending the elimination of carrying charges and thus the amount of under recovery that Otter Tail is currently experiencing will not have a negative financial impact on the Company's ratepayers. Second, this lower CCRA will moderate the incremental bill impact associated with the combined increase in the CCRA and the TCR that will likely occur later this year. Regarding the Company's proposed increase to the CCRA in 2015, the Department makes no recommendation at this time. Rather, the Department will review the Company's CIP tracker balance when Otter Tail files its annual CIP tracker report next May and will develop a recommendation on the level of the 2015 CCRA on the basis of that information.

### III. SUMMARY AND RECOMMENDATIONS

For convenience, the Department provides the following complete listing of its recommendations in this matter. The Department recommends that the Commission:

- Approve Otter Tail's CIP tracker account, as summarized in Table 1 of the Department's May 1, 2014 comments;
- Approve an incentive of \$4,026,600 for Otter Tail's 2013 CIP achievements;
- Grant Otter Tail a variance to Minnesota Rules part 7820.3500 (K) and a variance to Minnesota Rules part 7825.2600 for one year after the issue date of the Commission's Order in the present docket;
- Eliminate the carrying charge Otter Tail applies to the tracker balance for the CIP rider effective with the date of the Commission's Order.
- Approve OTP's request to book its 2013 financial incentive in the month following Commission approval; and
- Approve a CCRA of \$0.002640/kWh starting with the first billing cycle in the month following Commission approval, allowing reasonable time for implementation and customer notice.

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Analyst assigned: John Kundert

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If the Commission prefers not to eliminate the carrying charge Otter Tail applies to the tracker balance going forward, then the Department recommends that the carrying charge applied to the tracker balance, excluding the financial incentive, be set equal to the Company's cost of short-term debt.

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## **CERTIFICATE OF SERVICE**

I, Sharon Ferguson, hereby certify that I have this day, served copies of the following document on the attached list of persons by electronic filing, certified mail, e-mail, or by depositing a true and correct copy thereof properly enveloped with postage paid in the United States Mail at St. Paul, Minnesota.

**Minnesota Department of Commerce  
Supplemental Response Comments**

**Docket No. E017/M-14-201**

**Dated this 8<sup>th</sup> day of July 2014**

**/s/Sharon Ferguson**

| First Name  | Last Name | Email                         | Company Name                       | Address   | Delivery Method    | View Trade Secret | Service List Name      |
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| George      | Agriesti  | gagriesti@mnpower.com         | Minnesota Power                    | 30 W Superior St<br><br>Duluth,<br>MN<br>55802                      | Electronic Service | No                | OFF_SL_14-201_M-14-201 |
| Michael     | Ahern     | ahern.michael@dorsey.com      | Dorsey & Whitney, LLP              | 50 S 6th St Ste 1500<br><br>Minneapolis,<br>MN<br>554021498         | Electronic Service | No                | OFF_SL_14-201_M-14-201 |
| Julie Rae   | Ambach    | jambach@shakopeeutilities.com | Shakopee Public Utilities          | 255 Sarazin St<br><br>Shakopee,<br>MN<br>55379                      | Electronic Service | No                | OFF_SL_14-201_M-14-201 |
| Julia       | Anderson  | Julia.Anderson@ag.state.mn.us | Office of the Attorney General-DOC | 1800 BRM Tower<br>445 Minnesota St<br>St. Paul,<br>MN<br>551012134  | Electronic Service | Yes               | OFF_SL_14-201_M-14-201 |
| Christopher | Anderson  | canderson@allete.com          | Minnesota Power                    | 30 W Superior St<br><br>Duluth,<br>MN<br>558022191                  | Electronic Service | No                | OFF_SL_14-201_M-14-201 |
| Tom         | Balster   | tombalster@alliantenergy.com  | Interstate Power & Light Company   | PO Box 351<br>200 1st St SE<br>Cedar Rapids,<br>IA<br>524060351     | Electronic Service | No                | OFF_SL_14-201_M-14-201 |
| William     | Black     | bblack@mmua.org               | MMUA                               | Suite 400<br>3025 Harbor Lane North<br>Plymouth,<br>MN<br>554475142 | Electronic Service | No                | OFF_SL_14-201_M-14-201 |
| William A.  | Blazar    | bblazar@mnychamber.com        | Minnesota Chamber Of Commerce      | Suite 1500<br>400 Robert Street North<br>St. Paul,<br>MN<br>55101   | Electronic Service | No                | OFF_SL_14-201_M-14-201 |
| Michael     | Bradley   | mike.bradley@lawmoss.com      | Moss & Barnett                     | Suite 4800<br>90 S 7th St<br>Minneapolis,<br>MN<br>55402-4129       | Electronic Service | No                | OFF_SL_14-201_M-14-201 |
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| Richard G   | Burud     | rburud@noblesce.com           | Nobles Cooperative Electric        | 22636 US HIGHWAY 59<br>PO Box 788<br>Worthington,<br>MN<br>56187    | Electronic Service | No                | OFF_SL_14-201_M-14-201 |

| First Name | Last Name | Email                                   | Company Name                           | Address  | Delivery Method    | View Trade Secret | Service List Name      |
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| Gary       | Connett   | gconnett@greenergy.com                  | Great River Energy                     | 12300 Elm Creek Blvd N<br><br>Maple Grove,<br>MN<br>553694718            | Electronic Service | No                | OFF_SL_14-201_M-14-201 |
| George     | Crocker   | gwillc@nawo.org                         | North American Water Office            | PO Box 174<br><br>Lake Elmo,<br>MN<br>55042                              | Electronic Service | No                | OFF_SL_14-201_M-14-201 |
| Jill       | Curran    | jcurran@mnychamber.com                  | Minnesota Waste Wise                   | 400 Robert Street North<br>Suite 1500<br>St. Paul,<br>Minnesota<br>55101 | Electronic Service | No                | OFF_SL_14-201_M-14-201 |
| Jeffrey A. | Daugherty | jeffrey.daugherty@centerpointenergy.com | CenterPoint Energy                     | 800 LaSalle Ave<br><br>Minneapolis,<br>MN<br>55402                       | Electronic Service | No                | OFF_SL_14-201_M-14-201 |
| Executive  | Director  | N/A                                     | Sustainable Resources Center           | 1081 10th Ave SE<br><br>Minneapolis,<br>MN<br>55414                      | Paper Service      | No                | OFF_SL_14-201_M-14-201 |
| Steve      | Downer    | sdowner@mmua.org                        | MMUA                                   | 3025 Harbor Ln N Ste 400<br><br>Plymouth,<br>MN<br>554475142             | Electronic Service | No                | OFF_SL_14-201_M-14-201 |
| Chris      | Duffrin   | chrisd@thenec.org                       | Neighborhood Energy Connection         | 624 Selby Avenue<br><br>St. Paul,<br>MN<br>55104                         | Electronic Service | No                | OFF_SL_14-201_M-14-201 |
| Jim        | Erchul    |   | Daytons Bluff Neighborhood Housing Sv. | 823 E 7th St<br><br>St. Paul,<br>MN<br>55106                             | Paper Service      | No                | OFF_SL_14-201_M-14-201 |
| James C.   | Erickson  | jericksonkbc@gmail.com                  | Kelly Bay Consulting                   | 17 Quechee St<br><br>Superior,<br>WI<br>54880-4421                       | Electronic Service | No                | OFF_SL_14-201_M-14-201 |

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| Greg       | Ernst      | gaernst@q.com                | G. A. Ernst & Associates, Inc.       | 2377 Union Lake Trl<br><br>Northfield,<br>MN<br>55057                    | Electronic Service | No                | OFF_SL_14-201_M-14-201 |
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| Sharon     | Ferguson   | sharon.ferguson@state.mn.us  | Department of Commerce               | 85 7th Place E Ste 500<br><br>Saint Paul,<br>MN<br>551012198             | Electronic Service | No                | OFF_SL_14-201_M-14-201 |
| Edward     | Garvey     | garveyed@aol.com             | Residence                            | 32 Lawton St<br><br>Saint Paul,<br>MN<br>55102                           | Paper Service      | No                | OFF_SL_14-201_M-14-201 |
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| Benjamin   | Gerber     | bgerber@mnchamber.com        | Minnesota Chamber of Commerce        | 400 Robert Street North<br>Suite 1500<br>St. Paul,<br>Minnesota<br>55101 | Electronic Service | No                | OFF_SL_14-201_M-14-201 |
| Bruce      | Gerhardson | bgerhardson@otpc.com         | Otter Tail Power Company             | PO Box 496<br>215 S Cascade St<br>Fergus Falls,<br>MN<br>565380496       | Electronic Service | No                | OFF_SL_14-201_M-14-201 |
| Rachel     | Gold       | rachel.gold@opower.com       | Opower                               | 1515 N. Courthouse Rd 8th Fl<br><br>Arlington,<br>VA<br>22201            | Electronic Service | No                | OFF_SL_14-201_M-14-201 |
| Elizabeth  | Goodpaster | bgoodpaster@mncenter.org     | MN Center for Environmental Advocacy | Suite 206<br>26 East Exchange Street<br>St. Paul,<br>MN<br>551011667     | Electronic Service | No                | OFF_SL_14-201_M-14-201 |
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| First Name | Last Name | Email                              | Company Name                | Address   | Delivery Method    | View Trade Secret | Service List Name      |
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| Lara V     | Greden    | N/A                                | The Weidt Group             | 5800 Baker Rd<br><br>Minnetonka,<br>MN<br>55345                 | Paper Service      | No                | OFF_SL_14-201_M-14-201 |
| Pat        | Green     | N/A                                | N Energy Dev                | City Hall<br>401 E 21st St<br>Hibbing,<br>MN<br>55746           | Paper Service      | No                | OFF_SL_14-201_M-14-201 |
| Jason      | Grenier   | jgrenier@otpc.com                  | Otter Tail Power Company    | 215 South Cascade Street<br><br>Fergus Falls,<br>MN<br>56537    | Electronic Service | No                | OFF_SL_14-201_M-14-201 |
| Stephan    | Gunn      | sgunn@appliedenergygroup.com       | Applied Energy Group        | 1941 Pike Ln<br><br>De Pere,<br>WI<br>54115                     | Electronic Service | No                | OFF_SL_14-201_M-14-201 |
| Burl W.    | Haar      | burl.haar@state.mn.us              | Public Utilities Commission | Suite 350<br>121 7th Place East<br>St. Paul,<br>MN<br>551012147 | Electronic Service | Yes               | OFF_SL_14-201_M-14-201 |
| Jeffrey    | Haase     | jhaase@greenergy.com               | Great River Energy          | 12300 Elm Creek Blvd<br><br>Maple Grove,<br>MN<br>55369         | Electronic Service | No                | OFF_SL_14-201_M-14-201 |
| Tony       | Hainault  | anthony.hainault@co.hennepin.mn.us | Hennepin County DES         | 701 4th Ave S Ste 700<br><br>Minneapolis,<br>MN<br>55415-1842   | Electronic Service | No                | OFF_SL_14-201_M-14-201 |
| J Drake    | Hamilton  | hamilton@fresh-energy.org          | Fresh Energy                | 408 St Peter St<br><br>Saint Paul,<br>MN<br>55101               | Electronic Service | No                | OFF_SL_14-201_M-14-201 |
| Patty      | Hanson    | phanson@rpu.org                    | Rochester Public Utilities  | 4000 E River Rd NE<br><br>Rochester,<br>MN<br>55906             | Electronic Service | No                | OFF_SL_14-201_M-14-201 |
| Norm       | Harold    | N/A                                | NKS Consulting              | 5591 E 180th St<br><br>Prior Lake,<br>MN<br>55372               | Paper Service      | No                | OFF_SL_14-201_M-14-201 |

| First Name | Last Name | Email                            | Company Name                          | Address  | Delivery Method    | View Trade Secret | Service List Name      |
|------------|-----------|----------------------------------|---------------------------------------|--|--------------------|-------------------|------------------------|
| Jared      | Hendricks | hendricksj@owatonnautilities.com | Owatonna Public Utilities             | PO Box 800<br>208 S Walnut Ave<br>Owatonna,<br>MN<br>55060-2940              | Electronic Service | No                | OFF_SL_14-201_M-14-201 |
| Jessy      | Hennesy   | jessy.hennesy@avantenergy.com    | Avant Energy                          | 220 S. Sixth St. Ste 1300<br><br>Minneapolis,<br>Minnesota<br>55402          | Electronic Service | No                | OFF_SL_14-201_M-14-201 |
| Shane      | Henriksen | shane.henriksen@enbridge.com     | Enbridge Energy Company, Inc.         | 1409 Hammond Ave FL 2<br><br>Superior,<br>WI<br>54880                        | Electronic Service | No                | OFF_SL_14-201_M-14-201 |
| Holly      | Hinman    | holly.r.hinman@xcelenergy.com    | Xcel Energy                           | 414 Nicollet Mall, 6th Floor<br><br>Minneapolis,<br>MN<br>55401              | Electronic Service | No                | OFF_SL_14-201_M-14-201 |
| Karolanne  | Hoffman   | kmh@dairy.net                    | Dairyland Power Cooperative           | PO Box 817<br><br>La Crosse,<br>WI<br>54602-0817                             | Electronic Service | No                | OFF_SL_14-201_M-14-201 |
| Randy      | Hoffman   | rhoffman@eastriver.coop          | East River Electric Power Coop        | 121 SE 1st St<br>PO Box 227<br>Madison,<br>SD<br>57042                       | Electronic Service | No                | OFF_SL_14-201_M-14-201 |
| Tom        | Holt      | tholt@eastriver.coop             | East River Electric Power Coop., Inc. | PO Box 227<br><br>Madison,<br>SD<br>57042                                    | Electronic Service | No                | OFF_SL_14-201_M-14-201 |
| Michael    | Hoy       | mhoy@dakotaelectric.com          | Dakota Electric Association           | 4300 220th St W<br><br>Farmington,<br>MN<br>55024-9583                       | Electronic Service | No                | OFF_SL_14-201_M-14-201 |
| Anne       | Hunt      | anne.hunt@ci.stpaul.mn.us        | City of Saint Paul                    | 390 City Hall<br>15 West Kellogg Boulevard<br><br>Saint Paul,<br>MN<br>55102 | Electronic Service | No                | OFF_SL_14-201_M-14-201 |
| Jim        | Jarvis    | N/A                              | ReDirect Energy, LLC                  | 44 7th Avenue NE<br><br>Minneapolis,<br>MN<br>55413                          | Paper Service      | No                | OFF_SL_14-201_M-14-201 |



| First Name | Last Name | Email                          | Company Name                                      | Address  | Delivery Method    | View Trade Secret | Service List Name      |
|------------|-----------|--------------------------------|---|--|--------------------|-------------------|------------------------|
| Eric       | Jensen    | ejensen@iwla.org               | Izaak Walton League of America                    | Suite 202<br>1619 Dayton Avenue<br>St. Paul,<br>MN<br>55104              | Electronic Service | No                | OFF_SL_14-201_M-14-201 |
| Joel       | Johnson   | joel@mrea.org                  | Minnesota Rural Electric Association              | 11640 73rd Ave N<br><br>Maple Grove,<br>MN<br>55369                      | Electronic Service | No                | OFF_SL_14-201_M-14-201 |
| Dave       | Johnson   | dave.johnson@aeoa.org          | Arrowhead Economic Opportunity Agency             | 702 3rd Ave S<br><br>Virginia,<br>MN<br>55792                            | Electronic Service | No                | OFF_SL_14-201_M-14-201 |
| Paula      | Johnson   | paulajohnson@alliantenergy.com | Alliant Energy-Interstate Power and Light Company | P.O. Box 351<br>200 First Street, SE<br>Cedar Rapids,<br>IA<br>524060351 | Electronic Service | No                | OFF_SL_14-201_M-14-201 |
| Dave       | Johnson   | N/A                            | Community Action of Minneapolis                   | 2104 Park Ave S<br><br>Minneapolis,<br>MN<br>55404                       | Paper Service      | No                | OFF_SL_14-201_M-14-201 |
| Larry      | Johnston  | lw.johnston@smmpa.org          | SMMPA   | 500 1st Ave SW<br><br>Rochester,<br>MN<br>55902-3303                     | Electronic Service | No                | OFF_SL_14-201_M-14-201 |
| Tina       | Koecher   | tkoecher@mnpower.com           | Minnesota Power                                   | 30 W Superior St<br><br>Duluth,<br>MN<br>558022093                       | Electronic Service | No                | OFF_SL_14-201_M-14-201 |
| Kelly      | Lady      | kellyl@austinutilities.com     | Austin Utilities                                  | 400 4th St NE<br><br>Austin,<br>MN<br>55912                              | Electronic Service | No                | OFF_SL_14-201_M-14-201 |
| James D.   | Larson    | james.larson@avantenergy.com   | Avant Energy Services                             | 220 S 6th St Ste 1300<br><br>Minneapolis,<br>MN<br>55402                 | Electronic Service | No                | OFF_SL_14-201_M-14-201 |
| Douglas    | Larson    | dlarson@dakotaelectric.com     | Dakota Electric Association                       | 4300 220th St W<br><br>Farmington,<br>MN<br>55024                        | Electronic Service | No                | OFF_SL_14-201_M-14-201 |

| First Name | Last Name | Email                             | Company Name                        | Address  | Delivery Method    | View Trade Secret | Service List Name      |
|------------|-----------|-----------------------------------|-------------------------------------|--|--------------------|-------------------|------------------------|
| Martin     | Lepak     | N/A                               | Arrowhead Economic Opportunity      | 702 S 3rd Ave<br><br>Virginia,<br>MN<br>55792                        | Paper Service      | No                | OFF_SL_14-201_M-14-201 |
| Allan      | Lian      | alian@mnpower.com                 | Minnesota Power                     | 30 W Superior St<br><br>Duluth,<br>MN<br>55802                       | Electronic Service | No                | OFF_SL_14-201_M-14-201 |
| John       | Lindell   | agorud.ecf@ag.state.mn.us         | Office of the Attorney General-RUD  | 1400 BRM Tower<br>445 Minnesota St<br>St. Paul,<br>MN<br>551012130   | Electronic Service | Yes               | OFF_SL_14-201_M-14-201 |
| Kavita     | Maini     | kmairi@wi.rr.com                  | KM Energy Consulting LLC            | 961 N Lost Woods Rd<br><br>Oconomowoc,<br>WI<br>53066                | Electronic Service | No                | OFF_SL_14-201_M-14-201 |
| Nick       | Mark      | nick.mark@centerpointenergy.com   | CenterPoint Energy                  | 800 LaSalle Ave<br><br>Minneapolis,<br>MN<br>55402                   | Electronic Service | No                | OFF_SL_14-201_M-14-201 |
| Pam        | Marshall  | pam@energycents.org               | Energy CENTS Coalition              | 823 7th St E<br><br>St. Paul,<br>MN<br>55106                         | Electronic Service | No                | OFF_SL_14-201_M-14-201 |
| Samuel     | Mason     | smason@beltramelectric.com        | Beltrami Electric Cooperative, Inc. | 4111 Technology Dr. NW<br>PO Box 488<br>Bemidji,<br>MN<br>56619-0488 | Electronic Service | No                | OFF_SL_14-201_M-14-201 |
| Matt       | McCaffree | bademailmatt.mccaffree@opower.com | Opower                              | 1515 N. Courthouse Rd 8th Fl<br><br>Arlington,<br>VA<br>22201        | Paper Service      | No                | OFF_SL_14-201_M-14-201 |
| Scot       | McClure   | scotmcclure@alliantenergy.com     | Interstate Power And Light Company  | 4902 N Biltmore Ln<br>PO Box 77007<br>Madison,<br>WI<br>537071007    | Electronic Service | No                | OFF_SL_14-201_M-14-201 |
| Tom        | McDougall | N/A                               | The Weidt Group                     | 5800 Baker Rd<br><br>Minnetonka,<br>MN<br>55345                      | Paper Service      | No                | OFF_SL_14-201_M-14-201 |

| First Name | Last Name  | Email                          | Company Name                      | Address  | Delivery Method    | View Trade Secret | Service List Name      |
|------------|------------|--------------------------------|-----------------------------------|--|--------------------|-------------------|------------------------|
| Bridget    | McLaughlin | bmclaughlin@mncee.org          | Center for Energy & Environment   | 212 3rd Ave N Ste 560<br><br>Minneapolis,<br>MN<br>55401           | Electronic Service | No                | OFF_SL_14-201_M-14-201 |
| John       | McWilliams | jmm@dairy.net.com              | Dairyland Power Cooperative       | 3200 East Ave SPO Box 817<br><br>La Crosse,<br>WI<br>54601-7227    | Electronic Service | No                | OFF_SL_14-201_M-14-201 |
| Brian      | Meloy      | brian.meloy@stinsonleonard.com | Stinson, Leonard, Street LLP      | 150 S 5th St Ste 2300<br><br>Minneapolis,<br>MN<br>55402           | Electronic Service | No                | OFF_SL_14-201_M-14-201 |
| Craig      | Metz       | N/A                            | EnSave Energy Performance         | 65 Millet St, Suite 105<br><br>Richmond,<br>VT<br>05477            | Paper Service      | No                | OFF_SL_14-201_M-14-201 |
| David      | Moeller    | dmoeller@allete.com            | Minnesota Power                   | 30 W Superior St<br><br>Duluth,<br>MN<br>558022093                 | Electronic Service | No                | OFF_SL_14-201_M-14-201 |
| Andrew     | Moratzka   | apmoratzka@stoel.com           | Stoel Rives LLP                   | 33 South Sixth Street<br>Suite 4200<br>Minneapolis,<br>MN<br>55402 | Electronic Service | No                | OFF_SL_14-201_M-14-201 |
| Gary       | Myers      | garym@hpuc.com                 | Hibbing Public Utilities          | 1902 E 6th Ave<br><br>Hibbing,<br>MN<br>55746                      | Electronic Service | No                | OFF_SL_14-201_M-14-201 |
| Susan K    | Nathan     | snathan@appliedenergygroup.com | Applied Energy Group              | 2215 NE 107th Ter<br><br>Kansas City,<br>MO<br>64155-8513          | Electronic Service | No                | OFF_SL_14-201_M-14-201 |
| Carl       | Nelson     | cnelson@mncee.org              | Center for Energy and Environment | 212 3rd Ave N Ste 560<br><br>Minneapolis,<br>MN<br>55401           | Electronic Service | No                | OFF_SL_14-201_M-14-201 |
| Paul       | Ohlson     | N/A                            | EnSave Energy Performance         | 65 Millet Street, Suite 105<br><br>Richmond,<br>VT<br>05477        | Paper Service      | No                | OFF_SL_14-201_M-14-201 |

| First Name | Last Name | Email                             | Company Name                  | Address  | Delivery Method    | View Trade Secret | Service List Name      |
|------------|-----------|-----------------------------------|-------------------------------|--|--------------------|-------------------|------------------------|
| Gary       | Olson     |                                   | Product Recovery, Inc.        | 2605 E Cliff Rd<br><br>Burnsville,<br>MN<br>55337                            | Paper Service      | No                | OFF_SL_14-201_M-14-201 |
| Debra      | Opatz     | dopatz@otpc.com                   | Otter Tail Power Company      | 215 South Cascade Street<br><br>Fergus Falls,<br>MN<br>56537                 | Electronic Service | No                | OFF_SL_14-201_M-14-201 |
| Larry      | Oswald    |                                   | Honeywell, Inc.               | 1335 2nd Ave N Ste B<br><br>Fargo,<br>ND<br>58103                            | Paper Service      | No                | OFF_SL_14-201_M-14-201 |
| Kim        | Pederson  | kpederson@otpc.com                | Otter Tail Power Company      | 215 S Cascade St<br>PO Box 496<br>Fergus Falls,<br>MN<br>565380496           | Electronic Service | No                | OFF_SL_14-201_M-14-201 |
| Audrey     | Peer      | audrey.peer@centerpointenergy.com | CenterPoint Energy            | 800 Lasalle Avenue - 14th<br>Floor<br><br>Minneapolis,<br>Minnesota<br>55402 | Electronic Service | No                | OFF_SL_14-201_M-14-201 |
| Lisa       | Pickard   | lpickard@minnkota.com             | Minnkota Power<br>Cooperative | 1822 Mill Rd<br>PO Box 13200<br>Grand Forks,<br>ND<br>582083200              | Electronic Service | No                | OFF_SL_14-201_M-14-201 |
| Bill       | Poppert   |                                   | Technology North              | 2433 Highwood Ave<br><br>St. Paul,<br>MN<br>55119                            | Paper Service      | No                | OFF_SL_14-201_M-14-201 |
| David G.   | Prazak    | dprazak@otpc.com                  | Otter Tail Power Company      | P.O. Box 496<br>215 South Cascade Street<br>Fergus Falls,<br>MN<br>565380496 | Electronic Service | No                | OFF_SL_14-201_M-14-201 |
| Michael    | Sachse    | N/A                               | Opower                        | 1515 N Courthouse Rd FL<br>8<br><br>Arlington,<br>VA<br>22201                | Paper Service      | No                | OFF_SL_14-201_M-14-201 |
|            |           |                                   |                               |  |                    |                   |                        |

| 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<br><br>St. Paul, MN 55101    | Electronic Service | No                | OFF_SL_14-201_M-14-201 |
| Bruce      | Saylor          | bruces@connexusenergy.com       | Connexus Energy               | 14601 Ramsey Boulevard<br><br>Ransey, MN 55303              | Electronic Service | No                | OFF_SL_14-201_M-14-201 |
| Larry L.   | Schedin         | Larry@LLSResources.com          | LLS Resources, LLC            | 12 S 6th St Ste 1137<br><br>Minneapolis, MN 55402           | Electronic Service | No                | OFF_SL_14-201_M-14-201 |
| Cindy      | Schweitzer Rott | cindy.schweitzer@clearesult.com | CLEAResult's                  | S12637A Merrilee Rd.<br><br>Spring Green, WI 53588          | Electronic Service | No                | OFF_SL_14-201_M-14-201 |
| Tom        | Smilanich       |                                 | Passive Concepts              | 228 6th Ave N<br><br>South St. Paul, MN 55075               | Paper Service      | No                | OFF_SL_14-201_M-14-201 |
| Ken        | Smith           | ken.smith@districtenergy.com    | District Energy St. Paul Inc. | 76 W Kellogg Blvd<br><br>St. Paul, MN 55102                 | Electronic Service | No                | OFF_SL_14-201_M-14-201 |
| Grey       | Staples         | gstaples@mendotagroup.com       | The Mendota Group LLC         | 1830 Fargo Lane<br><br>Mendota Heights, MN 55118            | Electronic Service | No                | OFF_SL_14-201_M-14-201 |
| Leo        | Steidel         | N/A                             | The Weidt Group               | 5800 Baker Rd<br><br>Minnetonka, MN 55345                   | Paper Service      | No                | OFF_SL_14-201_M-14-201 |
| Leo        | Steidel         | lsteidel@energyplatforms.com    | Energy Platforms              | 8170 Old Carriage Court N Ste 200<br><br>Shakopee, MN 55379 | Paper Service      | No                | OFF_SL_14-201_M-14-201 |
| John       | Steinhoff       |                                 | Resource Solutions, Inc.      | 318 Kensington Drive<br><br>Madison, WI 53704               | Paper Service      | No                | OFF_SL_14-201_M-14-201 |

| First Name | Last Name  | Email                             | Company Name                          | Address  | Delivery Method    | View Trade Secret | Service List Name      |
|------------|------------|-----------------------------------|---------------------------------------|--|--------------------|-------------------|------------------------|
| Richard    | Szydlowski | rszydlowski@mncee.org             | Center for Energy & Environment       | 212 3rd Ave N Ste 560<br>Minneapolis,<br>MN<br>55401-1459      | Electronic Service | No                | OFF_SL_14-201_M-14-201 |
| SaGonna    | Thompson   | Regulatory.Records@xcelenergy.com | Xcel Energy                           | 414 Nicollet Mall FL 7<br>Minneapolis,<br>MN<br>554011993      | Electronic Service | No                | OFF_SL_14-201_M-14-201 |
| Steve      | Tomac      | stomac@bepc.com                   | Basin Electric Power Cooperative      | 1717 E Interstate Ave<br>Bismarck,<br>ND<br>58501              | Electronic Service | No                | OFF_SL_14-201_M-14-201 |
| Stuart     | Tommerdahl | stommerdahl@otpc.com              | Otter Tail Power Company              | 215 S Cascade St<br>PO Box 496<br>Fergus Falls,<br>MN<br>56537 | Electronic Service | No                | OFF_SL_14-201_M-14-201 |
| Robert     | Walsh      | bwalsh@mnvalleyrec.com            | Minnesota Valley Coop Light and Power | PO Box 248<br>501 S 1st St<br>Montevideo,<br>MN<br>56265       | Electronic Service | No                | OFF_SL_14-201_M-14-201 |
| Roger      | Warehime   | warehimer@owatonnautilities.com   | Owatonna Public Utilities             | 208 South WalnutPO Box<br>800<br>Owatonna,<br>MN<br>55060      | Electronic Service | No                | OFF_SL_14-201_M-14-201 |
| Lisa       | Wilson     | lisa.wilson@enbridge.com          | Enbridge Energy Company, Inc.         | 1409 Hammond Ave FL 2<br>Superior,<br>WI<br>54880              | Electronic Service | No                | OFF_SL_14-201_M-14-201 |
| Robyn      | Woeste     | robynwoeste@alliantenergy.com     | Interstate Power and Light Company    | 200 First St SE<br>Cedar Rapids,<br>IA<br>52401                | Electronic Service | No                | OFF_SL_14-201_M-14-201 |

| First Name | Last Name | Email                                   | Company Name                       | Address  | Delivery Method    | View Trade Secret | Service List Name                |
|------------|-----------|---|------------------------------------|--|--------------------|-------------------|----------------------------------|
| George     | Agriesti  | gagriesti@mnpower.com                   | Minnesota Power                    | 30 W Superior St<br><br>Duluth,<br>MN<br>55802                           | Electronic Service | No                | SPL_SL__CIP SPECIAL SERVICE LIST |
| Julie Rae  | Ambach    | jambach@shakopeeutilities.com           | Shakopee Public Utilities          | 255 Sarazin St<br><br>Shakopee,<br>MN<br>55379                           | Electronic Service | No                | SPL_SL__CIP SPECIAL SERVICE LIST |
| Julia      | Anderson  | Julia.Anderson@ag.state.mn.us           | Office of the Attorney General-DOC | 1800 BRM Tower<br>445 Minnesota St<br>St. Paul,<br>MN<br>551012134       | Electronic Service | No                | SPL_SL__CIP SPECIAL SERVICE LIST |
| Tom        | Balster   | tombalster@alliantenergy.com            | Interstate Power & Light Company   | PO Box 351<br>200 1st St SE<br>Cedar Rapids,<br>IA<br>524060351          | Electronic Service | No                | SPL_SL__CIP SPECIAL SERVICE LIST |
| William    | Black     | bblack@mmua.org                         | MMUA                               | Suite 400<br>3025 Harbor Lane North<br>Plymouth,<br>MN<br>554475142      | Electronic Service | No                | SPL_SL__CIP SPECIAL SERVICE LIST |
| Christina  | Brusven   | cbrusven@fredlaw.com                    | Fredrikson & Byron, P.A.           | 200 S 6th St Ste 4000<br><br>Minneapolis,<br>MN<br>554021425             | Electronic Service | No                | SPL_SL__CIP SPECIAL SERVICE LIST |
| Gary       | Chesnut   | gchesnut@agp.com                        | AG Processing Inc. a cooperative   | 12700 West Dodge Road<br>PO Box 2047<br>Omaha,<br>NE<br>681032047        | Electronic Service | No                | SPL_SL__CIP SPECIAL SERVICE LIST |
| Gary       | Connett   | gconnett@grenergy.com                   | Great River Energy                 | 12300 Elm Creek Blvd N<br><br>Maple Grove,<br>MN<br>553694718            | Electronic Service | No                | SPL_SL__CIP SPECIAL SERVICE LIST |
| George     | Crocker   | gwillc@nawo.org                         | North American Water Office        | PO Box 174<br><br>Lake Elmo,<br>MN<br>55042                              | Electronic Service | No                | SPL_SL__CIP SPECIAL SERVICE LIST |
| Jill       | Curran    | jcurran@mncchamber.com                  | Minnesota Waste Wise               | 400 Robert Street North<br>Suite 1500<br>St. Paul,<br>Minnesota<br>55101 | Electronic Service | No                | SPL_SL__CIP SPECIAL SERVICE LIST |
| Jeffrey A. | Daugherty | jeffrey.daugherty@centerpointenergy.com | CenterPoint Energy                 | 800 LaSalle Ave<br><br>Minneapolis,<br>MN<br>55402                       | Electronic Service | No                | SPL_SL__CIP SPECIAL SERVICE LIST |

| First Name | Last Name | Email                        | Company Name                              | Address  | Delivery Method    | View Trade Secret | Service List Name                  |
|------------|-----------|------------------------------|---|--|--------------------|-------------------|------------------------------------|
| Steve      | Downer    | sdowner@mmua.org             | MMUA                                      | 3025 Harbor Ln N Ste 400<br><br>Plymouth,<br>MN<br>554475142 | Electronic Service | No                | SPL_SL_CIP SPECIAL<br>SERVICE LIST |
| Chris      | Duffrin   | chrisd@thenec.org            | Neighborhood Energy<br>Connection         | 624 Selby Avenue<br><br>St. Paul,<br>MN<br>55104             | Electronic Service | No                | SPL_SL_CIP SPECIAL<br>SERVICE LIST |
| Jim        | Erchul    |                              | Daytons Bluff<br>Neighborhood Housing Sv. | 823 E 7th St<br><br>St. Paul,<br>MN<br>55106                 | Paper Service      | No                | SPL_SL_CIP SPECIAL<br>SERVICE LIST |
| Greg       | Ernst     | gaernst@q.com                | G. A. Ernst & Associates,<br>Inc.         | 2377 Union Lake Trl<br><br>Northfield,<br>MN<br>55057        | Electronic Service | No                | SPL_SL_CIP SPECIAL<br>SERVICE LIST |
| Melissa S  | Feine     | melissa.feine@semcac.org     | SEMCAC                                    | PO Box 549<br>204 S Elm St<br>Rushford,<br>MN<br>55971       | Electronic Service | No                | SPL_SL_CIP SPECIAL<br>SERVICE LIST |
| Sharon     | Ferguson  | sharon.ferguson@state.mn.us  | Department of Commerce                    | 85 7th Place E Ste 500<br><br>Saint Paul,<br>MN<br>551012198 | Electronic Service | No                | SPL_SL_CIP SPECIAL<br>SERVICE LIST |
| Kelsey     | Genung    | kelsey.genung@xcelenergy.com | Xcel Energy                               | 414 Nicollet Mall, Fl. 6<br><br>Minneapolis,<br>MN<br>55401  | Electronic Service | No                | SPL_SL_CIP SPECIAL<br>SERVICE LIST |
| Angela E.  | Gordon    | angela.e.gordon@lmco.com     | Lockheed Martin                           | 1000 Clark Ave.<br><br>St. Louis,<br>MO<br>63102             | Electronic Service | No                | SPL_SL_CIP SPECIAL<br>SERVICE LIST |
| Pat        | Green     | N/A                          | N Energy Dev                              | City Hall<br>401 E 21st St<br>Hibbing,<br>MN<br>55746        | Paper Service      | No                | SPL_SL_CIP SPECIAL<br>SERVICE LIST |
| Stephan    | Gunn      | sgunn@appliedenergygroup.com | Applied Energy Group                      | 1941 Pike Ln<br><br>De Pere,<br>WI<br>54115                  | Electronic Service | No                | SPL_SL_CIP SPECIAL<br>SERVICE LIST |



| First Name | Last Name | Email                                  | Company Name                             | Address   | Delivery Method    | View Trade Secret | Service List Name                  |
|------------|-----------|--|--|---|--------------------|-------------------|------------------------------------|
| Burl W.    | Haar      | burl.haar@state.mn.us                  | Public Utilities Commission              | Suite 350<br>121 7th Place East<br>St. Paul,<br>MN<br>551012147 | Electronic Service | No                | SPL_SL_CIP SPECIAL<br>SERVICE LIST |
| Tony       | Hainault  | anthony.hainault@co.henn<br>epin.mn.us | Hennepin County DES                      | 701 4th Ave S Ste 700<br><br>Minneapolis,<br>MN<br>55415-1842   | Electronic Service | No                | SPL_SL_CIP SPECIAL<br>SERVICE LIST |
| Patty      | Hanson    | phanson@rpu.org                        | Rochester Public Utilities               | 4000 E River Rd NE<br><br>Rochester,<br>MN<br>55906             | Electronic Service | No                | SPL_SL_CIP SPECIAL<br>SERVICE LIST |
| Norm       | Harold    | N/A                                    | NKS Consulting                           | 5591 E 180th St<br><br>Prior Lake,<br>MN<br>55372               | Paper Service      | No                | SPL_SL_CIP SPECIAL<br>SERVICE LIST |
| Jared      | Hendricks | hendricksj@owatonnautiliti<br>es.com   | Owatonna Public Utilities                | PO Box 800<br>208 S Walnut Ave<br>Owatonna,<br>MN<br>55060-2940 | Electronic Service | No                | SPL_SL_CIP SPECIAL<br>SERVICE LIST |
| Holly      | Hinman    | holly.r.hinman@xcelenergy<br>.com      | Xcel Energy                              | 414 Nicollet Mall, 6th Floor<br><br>Minneapolis,<br>MN<br>55401 | Electronic Service | No                | SPL_SL_CIP SPECIAL<br>SERVICE LIST |
| Randy      | Hoffman   | rhoffman@eastriver.coop                | East River Electric Power<br>Coop        | 121 SE 1st St<br>PO Box 227<br>Madison,<br>SD<br>57042          | Electronic Service | No                | SPL_SL_CIP SPECIAL<br>SERVICE LIST |
| Karolanne  | Hoffman   | kmh@dairy.net.com                      | Dairyland Power<br>Cooperative           | PO Box 817<br><br>La Crosse,<br>WI<br>54602-0817                | Electronic Service | No                | SPL_SL_CIP SPECIAL<br>SERVICE LIST |
| Tom        | Holt      | tholt@eastriver.coop                   | East River Electric Power<br>Coop., Inc. | PO Box 227<br><br>Madison,<br>SD<br>57042                       | Electronic Service | No                | SPL_SL_CIP SPECIAL<br>SERVICE LIST |
| Michael    | Hoy       | mhoy@dakotaelectric.com                | Dakota Electric Association              | 4300 220th St W<br><br>Farmington,<br>MN<br>55024-9583          | Electronic Service | No                | SPL_SL_CIP SPECIAL<br>SERVICE LIST |

| First Name | Last Name | Email                          | Company Name                                      | Address  | Delivery Method    | View Trade Secret | Service List Name                |
|------------|-----------|--------------------------------|---|--|--------------------|-------------------|----------------------------------|
| Anne       | Hunt      | anne.hunt@ci.stpaul.mn.us      | City of Saint Paul                                | 390 City Hall<br>15 West Kellogg Boulevard<br><br>Saint Paul,<br>MN<br>55102 | Electronic Service | No                | SPL_SL__CIP SPECIAL SERVICE LIST |
| Eric       | Jensen    | ejensen@iwla.org               | Izaak Walton League of America                    | Suite 202<br>1619 Dayton Avenue<br>St. Paul,<br>MN<br>55104                  | Electronic Service | No                | SPL_SL__CIP SPECIAL SERVICE LIST |
| Paula      | Johnson   | paulajohnson@alliantenergy.com | Alliant Energy-Interstate Power and Light Company | P.O. Box 351<br>200 First Street, SE<br>Cedar Rapids,<br>IA<br>524060351     | Electronic Service | No                | SPL_SL__CIP SPECIAL SERVICE LIST |
| Joel       | Johnson   | joel@mrea.org                  | Minnesota Rural Electric Association              | 11640 73rd Ave N<br><br>Maple Grove,<br>MN<br>55369                          | Electronic Service | No                | SPL_SL__CIP SPECIAL SERVICE LIST |
| Dave       | Johnson   | N/A                            | Community Action of Minneapolis                   | 2104 Park Ave S<br><br>Minneapolis,<br>MN<br>55404                           | Paper Service      | No                | SPL_SL__CIP SPECIAL SERVICE LIST |
| Dave       | Johnson   | dave.johnson@aeoa.org          | Arrowhead Economic Opportunity Agency             | 702 3rd Ave S<br><br>Virginia,<br>MN<br>55792                                | Electronic Service | No                | SPL_SL__CIP SPECIAL SERVICE LIST |
| Larry      | Johnston  | lw.johnston@smmpa.org          | SMMPA   | 500 1st Ave SW<br><br>Rochester,<br>MN<br>55902-3303                         | Electronic Service | No                | SPL_SL__CIP SPECIAL SERVICE LIST |
| Deborah    | Knoll     | dknoll@mnpower.com             | Minnesota Power                                   | 30 W Superior St<br><br>Duluth,<br>MN<br>55802                               | Electronic Service | No                | SPL_SL__CIP SPECIAL SERVICE LIST |
| Tina       | Koecher   | tkoecher@mnpower.com           | Minnesota Power                                   | 30 W Superior St<br><br>Duluth,<br>MN<br>558022093                           | Electronic Service | No                | SPL_SL__CIP SPECIAL SERVICE LIST |
| Kelly      | Lady      | kellyl@austinutilities.com     | Austin Utilities                                  | 400 4th St NE<br><br>Austin,<br>MN<br>55912                                  | Electronic Service | No                | SPL_SL__CIP SPECIAL SERVICE LIST |

| First Name | Last Name  | Email                           | Company Name                       | Address  | Delivery Method    | View Trade Secret | Service List Name                |
|------------|------------|---------------------------------|------------------------------------|--|--------------------|-------------------|----------------------------------|
| Martin     | Lepak      | N/A                             | Arrowhead Economic Opportunity     | 702 S 3rd Ave<br><br>Virginia,<br>MN<br>55792                      | Paper Service      | No                | SPL_SL__CIP SPECIAL SERVICE LIST |
| Allan      | Lian       | alian@mnpower.com               | Minnesota Power                    | 30 W Superior St<br><br>Duluth,<br>MN<br>55802                     | Electronic Service | No                | SPL_SL__CIP SPECIAL SERVICE LIST |
| John       | Lindell    | agorud.ecf@ag.state.mn.us       | Office of the Attorney General-RUD | 1400 BRM Tower<br>445 Minnesota St<br>St. Paul,<br>MN<br>551012130 | Electronic Service | No                | SPL_SL__CIP SPECIAL SERVICE LIST |
| Nick       | Mark       | nick.mark@centerpointenergy.com | CenterPoint Energy                 | 800 LaSalle Ave<br><br>Minneapolis,<br>MN<br>55402                 | Electronic Service | No                | SPL_SL__CIP SPECIAL SERVICE LIST |
| Pam        | Marshall   | pam@energycents.org             | Energy CENTS Coalition             | 823 7th St E<br><br>St. Paul,<br>MN<br>55106                       | Electronic Service | No                | SPL_SL__CIP SPECIAL SERVICE LIST |
| Scot       | McClure    | scotmcclure@alliantenergy.com   | Interstate Power And Light Company | 4902 N Biltmore Ln<br>PO Box 77007<br>Madison,<br>WI<br>537071007  | Electronic Service | No                | SPL_SL__CIP SPECIAL SERVICE LIST |
| John       | McWilliams | jmm@dairy.net                   | Dairyland Power Cooperative        | 3200 East Ave SPO Box<br>817<br><br>La Crosse,<br>WI<br>54601-7227 | Electronic Service | No                | SPL_SL__CIP SPECIAL SERVICE LIST |
| Brian      | Meloy      | brian.meloy@stinsonleonard.com  | Stinson, Leonard, Street LLP       | 150 S 5th St Ste 2300<br><br>Minneapolis,<br>MN<br>55402           | Electronic Service | No                | SPL_SL__CIP SPECIAL SERVICE LIST |
| David      | Moeller    | dmoeller@allete.com             | Minnesota Power                    | 30 W Superior St<br><br>Duluth,<br>MN<br>558022093                 | Electronic Service | No                | SPL_SL__CIP SPECIAL SERVICE LIST |
| Andrew     | Moratzka   | apmoratzka@stoel.com            | Stoel Rives LLP                    | 33 South Sixth Street<br>Suite 4200<br>Minneapolis,<br>MN<br>55402 | Electronic Service | No                | SPL_SL__CIP SPECIAL SERVICE LIST |

| First Name | Last Name       | Email                             | Company Name                      | Address   | Delivery Method    | View Trade Secret | Service List Name                |
|------------|-----------------|-----------------------------------|-----------------------------------|---|--------------------|-------------------|----------------------------------|
| Gary       | Myers           | garym@hpuc.com                    | Hibbing Public Utilities          | 1902 E 6th Ave<br><br>Hibbing,<br>MN<br>55746                             | Electronic Service | No                | SPL_SL__CIP SPECIAL SERVICE LIST |
| Susan K    | Nathan          | snathan@appliedenergygroup.com    | Applied Energy Group              | 2215 NE 107th Ter<br><br>Kansas City,<br>MO<br>64155-8513                 | Electronic Service | No                | SPL_SL__CIP SPECIAL SERVICE LIST |
| Carl       | Nelson          | cnelson@mncee.org                 | Center for Energy and Environment | 212 3rd Ave N Ste 560<br><br>Minneapolis,<br>MN<br>55401                  | Electronic Service | No                | SPL_SL__CIP SPECIAL SERVICE LIST |
| Gary       | Olson           |                                   | Product Recovery, Inc.            | 2605 E Cliff Rd<br><br>Burnsville,<br>MN<br>55337                         | Paper Service      | No                | SPL_SL__CIP SPECIAL SERVICE LIST |
| Kim        | Pederson        | kpederson@otpc.com                | Otter Tail Power Company          | 215 S Cascade St<br>PO Box 496<br>Fergus Falls,<br>MN<br>565380496        | Electronic Service | No                | SPL_SL__CIP SPECIAL SERVICE LIST |
| Audrey     | Peer            | audrey.peer@centerpointenergy.com | CenterPoint Energy                | 800 Lasalle Avenue - 14th Floor<br><br>Minneapolis,<br>Minnesota<br>55402 | Electronic Service | No                | SPL_SL__CIP SPECIAL SERVICE LIST |
| Lisa       | Pickard         | lpickard@minnkota.com             | Minnkota Power Cooperative        | 1822 Mill Rd<br>PO Box 13200<br>Grand Forks,<br>ND<br>582083200           | Electronic Service | No                | SPL_SL__CIP SPECIAL SERVICE LIST |
| Bill       | Poppert         |                                   | Technology North                  | 2433 Highwood Ave<br><br>St. Paul,<br>MN<br>55119                         | Paper Service      | No                | SPL_SL__CIP SPECIAL SERVICE LIST |
| Cindy      | Schweitzer Rott | cindy.schweitzer@clearesult.com   | CLEARResult's                     | S12637A Merrilee Rd.<br><br>Spring Green,<br>WI<br>53588                  | Electronic Service | No                | SPL_SL__CIP SPECIAL SERVICE LIST |
| Tom        | Smilanich       |                                   | Passive Concepts                  | 228 6th Ave N<br><br>South St. Paul,<br>MN<br>55075                       | Paper Service      | No                | SPL_SL__CIP SPECIAL SERVICE LIST |

| First Name | Last Name  | Email                             | Company Name                       | Address   | Delivery Method    | View Trade Secret | Service List Name               |
|------------|------------|-----------------------------------|------------------------------------|---|--------------------|-------------------|---------------------------------|
| Ken        | Smith      | ken.smith@districtenergy.com      | District Energy St. Paul Inc.      | 76 W Kellogg Blvd<br><br>St. Paul,<br>MN<br>55102             | Electronic Service | No                | SPL_SL_CIP SPECIAL SERVICE LIST |
| Leo        | Steidel    | N/A                               | The Weidt Group                    | 5800 Baker Rd<br><br>Minnetonka,<br>MN<br>55345               | Paper Service      | No                | SPL_SL_CIP SPECIAL SERVICE LIST |
| John       | Steinhoff  |                                   | Resource Solutions, Inc.           | 318 Kensington Drive<br><br>Madison,<br>WI<br>53704           | Paper Service      | No                | SPL_SL_CIP SPECIAL SERVICE LIST |
| Richard    | Szydlowski | rszydlowski@mncee.org             | Center for Energy & Environment    | 212 3rd Ave N Ste 560<br><br>Minneapolis,<br>MN<br>55401-1459 | Electronic Service | No                | SPL_SL_CIP SPECIAL SERVICE LIST |
| SaGonna    | Thompson   | Regulatory.Records@xcelenergy.com | Xcel Energy                        | 414 Nicollet Mall FL 7<br><br>Minneapolis,<br>MN<br>554011993 | Electronic Service | No                | SPL_SL_CIP SPECIAL SERVICE LIST |
| Steve      | Tomac      | stomac@bepc.com                   | Basin Electric Power Cooperative   | 1717 E Interstate Ave<br><br>Bismarck,<br>ND<br>58501         | Electronic Service | No                | SPL_SL_CIP SPECIAL SERVICE LIST |
| Lisa       | Wilson     | lisa.wilson@enbridge.com          | Enbridge Energy Company, Inc.      | 1409 Hammond Ave FL 2<br><br>Superior,<br>WI<br>54880         | Electronic Service | No                | SPL_SL_CIP SPECIAL SERVICE LIST |
| Robyn      | Woeste     | robynwoeste@alliantenergy.com     | Interstate Power and Light Company | 200 First St SE<br><br>Cedar Rapids,<br>IA<br>52401           | Electronic Service | No                | SPL_SL_CIP SPECIAL SERVICE LIST |