



Minnesota Energy Resources Corporation
2685 145th Street West
Rosemount, MN 55068
www.minnesotaenergyresources.com

May 1, 2024

Mr. Will Seuffert
Executive Secretary
Minnesota Public Utilities Commission
121 Seventh Place East, Suite 350
St. Paul, MN 55101

VIA ELECTRONIC FILING

Re: In the Matter of the Petition of Minnesota Energy Resources Corporation for Approval of the 2023 Conservation Improvement Program Tracker Account, Demand-Side Management Financial Incentive, and Conservation Cost Recovery Adjustment Factor

Docket No. G011/M-24-46

Dear Mr. Seuffert:

Enclosed, please find the Petition of Minnesota Energy Resources Corporation ("MERC") for Approval of the 2023 Conservation Improvement Program ("CIP")/Energy Conservation and Optimization ("ECO") Tracker Account, Demand-Side Management ("DSM") Financial Incentive, and Conservation Cost Recovery Adjustment factor. Excel versions of Attachment B, the Company's 2023 DSM Financial Incentive and supporting BENCOST analyses, are being filed concurrently.

The Minnesota Public Utilities Commission's October 28, 2014, Findings of Fact, Conclusions, and Order in Docket No. G011/GR-13-617 at Order Point 13 also required that MERC include, in future CIP tracker-account filings, annual compliance filings documenting that its CIP-exempt customers have been properly identified and are being properly billed. MERC has included an update regarding CIP billing compliance in the attached report.

Copies of this filing have been served on the Minnesota Department of Commerce, Division of Energy Resources and the Minnesota Office of the Attorney General – Residential Utilities Division. A summary of this filing has been served on all parties on the attached service lists.

Please contact me at (414) 221-4208 if you have any questions regarding this filing.

Sincerely,

A handwritten signature in black ink that reads "Joylyn C. Hoffman Malueg".

Joylyn C. Hoffman Malueg
Project Specialist 3
Minnesota Energy Resources Corporation

Enclosures
cc: Service Lists

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

Katie J. Sieben
Hwikwon Ham
Valerie Means
Joseph K. Sullivan
John A. Tuma

Chair
Commissioner
Commissioner
Commissioner
Commissioner

In the Matter of the Petition of Minnesota Energy Resources Corporation for Approval of the 2023 Conservation Improvement Program/Energy Conservation and Optimization Tracker Account, Demand-Side Management Financial Incentive, and Conservation Cost Recovery Adjustment Factor

Docket No. G011/M-24-46

PETITION

INTRODUCTION

Minnesota Energy Resources Corporation (“MERC” or the “Company”) submits this Petition pursuant to the Minnesota Public Utilities Commission’s (“Commission”) Order Establishing Utility Performance Incentives for Energy Conservation issued in Docket No. E,G999/CI-08-133. In this filing, MERC seeks approval of its Conservation Improvement Program (“CIP”)/Energy Conservation and Optimization (“ECO”) tracker account balance and a Demand-Side Management (“DSM”) financial incentive for the period January 1, 2023, through December 31, 2023. MERC is also seeking Commission approval of a proposed modified Conservation Cost Recovery Adjustment (“CCRA”) factor effective January 1, 2025. MERC has filed its ECO Status Report covering the same period in Docket No. G011/CIP-20-479.

I. Summary of Filing

A one-paragraph summary of the filing accompanies this Petition pursuant to Minn. R. 7829.1300, subp. 1.

II. Service on Other Parties

Pursuant to Minn. R. 7829.1300, subp. 2, MERC has served a copy of this petition on the Minnesota Department of Commerce, Division of Energy Resources and the Minnesota

Office of the Attorney General – Residential Utilities Division. A summary of this filing has been served on all parties on the attached service list.

III. General Filing Information

Pursuant to Minn. R. 7829.1300, subp. 3, MERC provides the following information:

A. Name, Address, and Telephone Number of Filing Party

Minnesota Energy Resources Corporation
2685 145th Street West
Rosemount, MN 55068
(651) 322-8901

B. Name, Address, Electronic Address, and Telephone Number of Attorney for the Filing Party

Kristin M. Stastny
Taft Stettinius & Hollister LLP
2200 IDS Center
80 South Eighth Street
Minneapolis, MN 55402
KStastny@taftlaw.com
(612) 977-8656

C. Date of Filing and Proposed Effective Date

MERC is submitting this filing on May 1, 2024. MERC has calculated the new CCRA factor based on an assumed effective date of January 1, 2025, and assumed 12-month effective period.

D. Statute Controlling Schedule for Processing the Filing

Minn. Stat. § 216B.16, subd. 1, allows a utility to place a rate change into effect upon 60 days' notice to the Commission, unless the Commission otherwise orders. Minn. Stat. § 216B.16, subds. 6b-6c further allow public utilities to file rate schedules providing for annual recovery of actual conservation costs and approved incentives. Under Minn. R. 7829.0100, subp. 11, this Petition constitutes a miscellaneous filing because no determination of the Company's general revenue requirement is necessary. Minn. R. 7829.1400, subp. 1, permits initial comments on miscellaneous filings to be made within 30 days of filing with reply comments due 10 days thereafter.

E. Signature, Electronic Address, and Title of Utility Employee Responsible for the Filing



Joylyn C. Hoffman Malueg
Project Specialist 3
Minnesota Energy Resources Corporation
231 W. Michigan Street
Milwaukee, WI 53203
Joylyn.HoffmanMalueg@wecenergygroup.com

IV. Description and Purpose of Filing

A. Background

In this Petition, MERC seeks the Commission's approval of its CIP/ECO tracker account balances as of December 31, 2023. Additionally, MERC seeks Commission approval of a DSM financial incentive for 2023 in the amount of \$1,494,587, excluding the costs and net benefits associated with approved low-income programs that are not cost-effective, in accordance with Minn. Stat. § 216B.241, subd. 7. MERC also seeks Commission approval of a CCRA surcharge to customers of \$0.01221 per therm, with a proposed effective date of January 1, 2025.

B. 2022 CIP/ECO Tracker Account and 2023 CIP/ECO Tracker Activity

On May 1, 2023, MERC submitted a petition for approval of its 2022 CIP/ECO tracker account activity, DSM financial incentive, and revised CCRA in Docket No. G011/M-23-183. Specifically, MERC requested that the Commission approve the Company's 2022 DSM financial incentive of \$1,246,952; approve MERC's 2022 CIP/ECO tracker activity; and approve a revised CCRA of \$0.00155 per therm to be effective January 1, 2024. The Commission approved MERC's 2022 CIP/ECO tracker activity and DSM incentive by Order dated September 5, 2023, with the revised CCRA effective January 1, 2024.¹

¹ *In the Matter of Minn. Energy Res. Corp. for Approval of 2022 Conservation Improvement Program Tracker Account, Demand-Side Management Financial Incentive, and Conservation Cost Recovery Adjustment Factor*, Docket No. G011/M-23-183, ORDER (Sept. 5, 2023).

The table below provides a summary of activities in the MERC CIP tracker account in 2023.

MERC CIP/ECO Tracker 2023 Activity

Beginning Balance – January 1, 2023	(\$3,312,712.70)
CIP/ECO Expenses – January 1, 2023 – December 31, 2023	\$11,820,715.82
Carrying Charges – January 1, 2023 – December 31, 2023	(\$187,870.46)
DSM Financial Incentive	\$1,246,952.00
CIP/ECO Recoveries – January 1, 2023 – December 31, 2023	(\$12,637,258.47)
Ending Balance – December 31, 2023	(\$3,070,173.82)

Attachment A includes MERC’s 2023 CIP/ECO tracker account activity.

C. Proposed DSM Financial Incentive

1. *Calculation of DSM Financial Incentive*

MERC seeks Commission approval of a DSM financial incentive of \$1,494,587 for 2023 based on energy savings of 397,439 dekatherms, in accordance with the Commission’s December 9, 2020, Order Approving 2021-2023 Parameters for Shared Savings Demand-Side Management Financial Incentive in Docket No. E,G999/CI-08-133.² Supporting documentation is provided in Attachment B.

MERC has excluded Next Generation Energy Act assessments in the amount of \$171,487 from the calculation of net benefits consistent with the Commission’s December 9, 2020, Order Approving 2021-2023 Parameters for Shared Savings Demand-Side Management Financial Incentive in Docket No. E,G999/CI-08-133. Additionally, MERC has excluded the costs and benefits associated with its Low Income Weatherization and 4U2 programs in accordance with Minn. Stat. § 216B.241, subd. 7(i),³ as neither of these approved low-income

² *In the Matter of Comm’n Review of Util. Performance Incentives for Energy Conservation Pursuant to Minn. Stat. § 216B.241, Subd. 2c*, Docket No. E,G999/CI-08-133, ORDER APPROVING 2021-2023 PARAMETERS FOR SHARED SHAVINGS DEMAND-SIDE MANAGEMENT FINANCIAL INCENTIVE (Dec, 9, 2020).

³ Minn. Stat. § 216B.241, subd. 7(i) provides:

programs is cost effective under the utility cost test, as show in the following table.

Program	Utility Cost Test Results (2023)
Low Income Weatherization	0.68
4U2	0.38

Minn. Stat. § 216B.241, subd. 7(i) provides that costs and benefits associated with any approved low-income gas or electric conservation improvement program that is not cost-effective when considering the costs and benefits to the utility may, at the discretion of the utility, be excluded from the calculation of net economic benefits for purposes of calculating the financial incentive to the utility. The energy and demand savings may, at the discretion of the utility, be applied toward the calculation of overall portfolio energy and demand savings for purposes of determining progress toward annual goals and in the financial incentive mechanism.⁴ The Commission approved MERC’s 2020, 2021, and 2022 DSM financial incentives that similarly excluded these costs and benefits.⁵ MERC proposes to continue this practice as these programs continued to not be cost effective under the utility cost test.

MERC’s requested DSM financial incentive is consistent with the incentive mechanism as approved in the Commission’s Order Approving 2021-2023 Parameters for Shared Savings Demand-Side Management Financial Incentive dated December 9, 2020 in Docket No. E,G-999/CI-08-133. The modified Shared Savings Model authorizes financial incentives for natural

The costs and benefits associated with any approved low-income gas or electric conservation improvement program that is not cost-effective when considering the costs and benefits to the utility may, at the discretion of the utility, be excluded from the calculation of net economic benefits for purposes of calculating the financial incentive to the utility. The energy and demand savings may, at the discretion of the utility, be applied toward the calculation of overall portfolio energy and demand savings for purposes of determining progress toward annual goals and in the financial incentive mechanism.

⁴ In accordance with Minn. Stat. § 216B.241, subd. 7(i), the savings attributable to these programs is applied toward the calculation of overall portfolio energy and demand savings for purposes of determining progress toward annual goals and in the financial incentive mechanism. As reflected in Attachment B to this filing, MERC has calculated its 2023 incentive excluding both of these low-income programs’ 2023 spending and net benefits.

⁵ August 31, 2022 Order in Docket No. G-011/M-22-209, October 22, 2021 Order in Docket No. G-011/M-21-307, and September 5, 2023 Order in Docket No. G011/M-23-183.

gas utilities that achieve energy savings of at least 0.7 percent of the utility's retail sales. For a utility that achieves energy savings equal to 0.7 percent of retail sales, the utility is awarded a share of net benefits. For each additional 0.1 percent of energy savings the utility achieves, the net benefits awarded increase by an additional 0.75 percent until the utility achieves a savings of 1.2 percent of retail sales. For savings levels of 1.2 percent and higher, the utility is awarded a share of the net benefits equal to the Net Benefits Cap of 10.0 percent. The increasing incentives under the plan encourage MERC to seek energy savings through completed customer conservation measures.

The incentive is designed to tie the financial incentive to the utility's progress towards meeting its energy savings goal. Additionally, the incentive will not exceed the net benefits created through the savings and therefore, customers receive the majority of the benefits achieved under the Company's CIP/ECO program. Specifically, the shared savings DSM incentive caps the incentive awarded at 10.0 percent of net benefits in 2023. The incentive mechanism is designed to encourage utilities to achieve cost-effective conservation.

D. Proposed CCRA

In the Company's 2008 rate case, the Commission approved a CCRA for the Company with an initial rate of \$0.0000 per therm and required the Company to file adjustment reports by May 1 of each calendar year. The current CCRA factor of \$0.00155 was approved by the Commission by Order dated September 5, 2023, in Docket No. G-011/M-23-183, and was implemented effective January 1, 2024.

MERC's tracker balance as of January 1, 2024, is an over-recovery of \$3,070,173.82. The estimated MERC CIP/ECO tracker balance as of December 31, 2025, based on anticipated expense and collections via the conservation cost recovery charge ("CCRC"), is an under-collection of \$5,225,155. As a result, MERC proposes to set the CCRA factor to \$0.01221 per therm effective January 1, 2025 to collect the under-collection balance forecasted on the CIP/ECO tracker through 2025. As shown in Attachment C, setting the CCRA to \$0.01221 on

January 1, 2025, is projected to collect the forecasted CIP/ECO tracker under-recovery of \$5,225,155 currently projected as of December 31, 2025.

Included as Attachment D are proposed redline changes to MERC's Tariff Sheet No. 7.02a, incorporating the proposed modified CCRA rate. The Company proposes to implement the bill message below, effective the first month the new CCRA factor takes effect, notifying customers of the change in their monthly bills:

Effective January 1, 2025, the CCRA (conservation cost recovery adjustment) has been revised to \$0.01221 per therm. The CCRA is an annual adjustment to true-up under-recovery or over-recovery of CIP (conservation improvement program) expenses.

E. Effect of Change on MERC Revenue

This Petition has no effect on MERC's revenue. The CCRA is forecasted to collect the difference between the CIP/ECO expenses actually recovered through the CCRC and the CIP/ECO tracker account balance as of January 2025 over approximately one year. In particular, as shown in Attachment C, setting the CCRA to \$0.01221 on January 1, 2025, is projected to recover the tracker balance of \$5,225,142 projected as of December 31, 2025.

F. CIP-Exempt Customer Billing Review

In its October 28, 2014, Findings of Fact, Conclusions, and Order in Docket No. G011/GR-13-617, the Commission ordered MERC to make annual compliance filings with future CIP tracker filings documenting that its CIP-exempt customers have been properly identified and are being properly billed.⁶

Since the imposition of this requirement, MERC has continued to conduct monthly reviews of a sample of customer bills, across all bill classes, to ensure proper billing of CIP charges. MERC has also committed to review all CIP-exempt rate codes on a quarterly basis to ensure customers who are treated as CIP-exempt have received an exemption. Based on

⁶ *In the Matter of a Petition by Minn. Energy Res. Corp. for Auth. To Increase Nat. Gas Rates in Minn.*, Docket No. G011/GR-13-617, FINDINGS OF FACT, CONCLUSIONS, AND ORDER at 10 (Oct. 28, 2014).

MERC's continued review, all customers on CIP-exempt rate codes have a valid exemption on file and no additional billing issues have been identified.

CONCLUSION

MERC respectfully requests that the Commission approve its CIP/ECO tracker account balances for 2023 with an ending balance of (\$3,070,173.82). Additionally, MERC requests that the Commission approve a 2023 DSM financial incentive of \$1,494,587. Finally, MERC requests approval to set the CCRA factor to \$0.01221 per therm effective January 1, 2025.

Dated: May 1, 2024

Respectfully submitted,

TAFT STETTINIUS & HOLLISTER LLP

By: /s/ Kristin M. Stastny

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Attorney for Minnesota Energy

Resources Corporation

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

Katie J. Sieben
Valerie Means
Matthew Schuerger
Joseph K. Sullivan
John A. Tuma

Chair
Commissioner
Commissioner
Commissioner
Commissioner

In the Matter of the Petition of Minnesota Energy Resources Corporation for Approval of the 2023 Conservation Improvement Program Tracker Account, Demand-Side Management Financial Incentive, and Conservation Cost Recovery Adjustment Factor

Docket No. G011/M-24-46

SUMMARY OF FILING

Please take notice that on May 1, 2024, Minnesota Energy Resources Corporation submitted to the Minnesota Public Utilities Commission (“Commission”) a Petition for Approval of its 2023 Conservation Improvement Program/Energy Conservation and Optimization tracker account balance, 2023 Demand-Side Management financial incentive, and Conservation Cost Recovery Adjustment factor.

Please note that this filing is available through the eDockets system maintained by the Minnesota Department of Commerce (“Department”) and the Commission. You can access this document by going to eDockets through the websites of the Department or the Commission or by going to the eDockets homepage at:

<https://www.edockets.state.mn.us/EFiling/edockets/searchDocuments.do?method=showEdocketsSearch&showEdocket=true&userType=public>. Once on the eDockets homepage, this document can be accessed through the “Search Documents” link and by entering Docket Number 24-46.

Attachment A

2023 CIP Tracker

Minnesota Energy Resources
CIP Tracker Balance Calculation
As of 12/31/23

	PY Ending Balance	January	February	March	April	May	June	July	August	September	October	November	December	CY Total
Beginning Balance														
1. (excl. carry cost through July 2015) Acquired IPL tracker balance		(3,312,712.70)	(4,338,103.46)	(5,432,256.33)	(6,307,973.23)	(7,013,885.16)	(6,941,147.36)	(6,680,925.20)	(6,432,162.29)	(5,638,163.08)	(4,816,079.27)	(3,087,235.70)	(3,053,253.41)	(3,312,712.70)
2. Expenses		1,043,050.90	804,505.70	902,833.65	757,754.38	960,020.63	730,982.00	673,047.91	1,290,616.65	1,151,288.15	1,010,293.66	1,011,475.49	1,484,846.70	11,820,715.82
3. Recoveries		(2,055,466.28)	(1,882,410.54)	(1,759,683.23)	(1,442,687.59)	(866,521.68)	(450,777.01)	(405,046.23)	(479,753.54)	(314,799.32)	(519,168.08)	(968,360.84)	(1,492,584.13)	(12,637,258.47)
4. Incentives											1,246,952.00			1,246,952.00
Subtotal Balance														
5. Line 1+2-3+4		(4,325,128.08)	(5,416,008.30)	(6,289,105.91)	(6,992,906.44)	(6,920,386.20)	(6,660,942.37)	(6,412,923.52)	(5,621,299.18)	(4,801,674.25)	(3,078,001.70)	(3,044,121.05)	(3,060,990.85)	(2,882,303.35)
6. Monthly Carry Cost **		(12,975.38)	(16,248.02)	(18,867.32)	(20,978.72)	(20,761.16)	(19,982.83)	(19,238.77)	(16,863.90)	(14,405.02)	(9,234.01)	(9,132.36)	(9,182.97)	(187,870.46)
Ending Balance														
7 (Line 5+6)		(3,312,712.70)	(4,338,103.46)	(5,432,256.33)	(6,307,973.23)	(7,013,885.16)	(6,941,147.36)	(6,680,925.20)	(6,432,162.29)	(5,638,163.08)	(4,816,079.27)	(3,087,235.70)	(3,053,253.41)	(3,070,173.82)

** Carry Cost charge:
3.6000% annual rate
12 months
0.00300000 monthly rate

Effective in August 2015, carrying charges are based on the total net tracker balance inclusive of carrying charges

Minnesota Energy Resources
 CCRC Recovery by Class (in therms)
 As of 12/31/23

CCRC:	January	February	March	April	May	June	July	August	September	October	November	December	YTD
Gas Residential	34,703,000	30,638,032	28,346,750	22,207,143	12,562,550	4,378,868.80	3,343,476	2,702,626	2,992,376	4,269,271	12,803,288	23,932,268	182,879,648
Gas Small C&I	1,704,761	1,518,649	1,344,828	1,035,653	521,455	150,236.40	81,187	123,203	407,349	165,409	644,810	1,196,071	8,893,611
Gas Large C&I	19,742,534	17,426,460	16,607,200	13,184,541	7,689,149	3,251,152.30	2,298,665	5,655,552	(504,634)	5,084,159	8,914,452	14,012,256	113,361,486
Gas Large C&I Int.	2,909,623	2,499,012	2,646,763	1,927,137	669,481	721,720.10	534,388	652,762	483,047	1,536,073	1,947,237	2,100,613	18,627,855
Transport of Gas	9,421,770	9,751,671	8,771,450	9,102,461	7,004,307	6,315,414.90	7,047,359	6,622,240	6,955,088	5,874,890	7,616,519	7,777,999	92,261,166
Total Therms	68,481,688	61,833,824	57,716,991	47,456,934	28,446,942	14,817,393	13,305,075	15,756,382	10,333,226	16,929,802	31,926,305	49,019,207	416,023,767
CCRC rate *	0.02929	0.02929	0.02929	0.02929	0.02929	0.02929	0.02929	0.02929	0.02929	0.02929	0.02929	0.02929	0.02929
CCRC Recovery	\$ 2,005,828.64	\$ 1,811,112.70	\$ 1,690,530.65	\$ 1,390,013.61	\$ 833,210.93	\$ 434,001.43	\$ 389,705.64	\$ 461,504.43	\$ 302,660.18	\$ 495,873.89	\$ 935,121.48	\$ 1,435,772.56	\$ 12,185,336.12

* CCRC Final rate effective Jan 1, 2023

Minnesota Energy Resources
 CCRA Recovery by Class (in therms)
 As of 12/31/23

CCRA:	January**	February	March**	April**	May	June	July	August	September	October	November	December	YTD
Gas Residential	34,703,000	30,267,866	28,346,750	22,207,143	12,831,771	4,023,186	3,263,053	2,678,236	3,123,926	7,420,675	9,531,605	23,888,555	182,285,765
Gas Small C&I	1,704,761	1,518,649	1,344,828	1,035,653	521,455	150,236	81,187	123,203	407,349	165,409	644,810	1,196,071	8,893,611
Gas Large C&I	19,742,534	17,426,460	16,607,200	13,184,541	7,689,149	3,251,152	2,298,665	5,655,552	(504,634)	5,084,159	8,914,452	14,012,256	113,361,486
Gas Large C&I Int.	2,909,623	2,499,012	2,646,763	1,927,137	669,481	721,720	534,388	652,762	483,047	1,536,073	1,947,237	2,100,613	18,627,855
Transport of Gas	9,421,770	9,751,671	8,771,450	9,102,461	7,004,307	6,315,415	7,047,359	6,622,240	6,955,088	5,874,890	7,616,519	7,777,999	92,261,166
Total Therms	68,481,688	61,463,657	57,716,991	47,456,934	28,716,163	14,461,710	13,224,652	15,731,992	10,464,776	20,081,206	28,654,622	48,975,494	415,429,883
CCRA rate *	0.00116	0.00116	0.00116	0.00116	0.00116	0.00116	0.00116	0.00116	0.00116	0.00116	0.00116	0.00116	639,680,390
Diff in Open C & Calc**	(29,801.12)		2,200.87	(2,376.06)									
CCRA Recovery	\$ 49,637.63	\$ 71,297.84	\$ 69,152.58	\$ 52,673.99	\$ 33,310.75	\$ 16,775.58	\$ 15,340.60	\$ 18,249.11	\$ 12,139.14	\$ 23,294.20	\$ 33,239.36	\$ 56,811.57	\$ 451,922.35

CCRA = Conservation Cost Recovery Adjustment

*Rate changed 1/1/23

**Entries booked based on actual CCRA billings.

Attachment B

2023 CIP Incentive

Energy Conservation Act (ECO)

BENEFIT COST FOR GAS -- Cost-Effectiveness Analysis

Company: **Minnesota Energy Resources**
Project: **Total Portfolio w/ ECO**
BENCOST - Portfolio

Input Data		2023
1) Retail Rate (\$/Dth) =	\$6.57	
Escalation Rate =	4.69%	
2) Non-Gas Fuel Retail Rate (\$/Fuel Unit) =	\$0.00	
Escalation Rate =	3.59%	
Non-Gas Fuel Units (ie. kWh,Gallons, etc) =	kWh	
3) Commodity Cost (\$/Dth) =	\$3.25	
Escalation Rate =	4.69%	
4) Demand Cost (\$/Dth/Yr) =	\$131.24	
Escalation Rate =	4.69%	
5) Peak Reduction Factor =	1.00%	
6) Variable O&M (\$/Dth) =	\$0.05	
Escalation Rate =	4.69%	
7) Non-Gas Fuel Cost (\$/Fuel Unit) =	\$0.02657	
Escalation Rate =	3.59%	
8) Non-Gas Fuel Loss Factor	7.70%	
9) Gas Environmental Damage Factor (\$/Dth) =	\$2.07	
Escalation Rate =	2.30%	
10) Non Gas Fuel Enviro. Damage Factor (\$/Unit) =	\$0.01984	
Escalation Rate =	2.30%	
11) Participant Discount Rate =	3.02%	
12) ECO Utility Discount Rate =	5.57%	
13) Societal Discount Rate =	3.02%	
14) General Input Data Year =	2020	
15a) Project Analysis Year 1 =	2023	
15b) Project Analysis Year 2 =		
15c) Project Analysis Year 3 =		
16 Utility Project Costs		
16 a) Administrative & Operating Costs =		\$7,495,941
16 b) Incentive Costs =		\$4,153,287
16 c) Total Utility Project Costs =		\$11,649,229
17) Direct Participant Costs (\$/Part.) =		\$151
18) Participant Non-Energy Costs (Annual \$/Part.) =		\$0.00
Escalation Rate =		2.30%
19) Participant Non-Energy Savings (Annual \$/Part) =		\$0.00
Escalation Rate =		2.30%
20) Project Life (Years) =		13.31
21) Avg. Dth/Part. Saved =		3.77
22) Avg Non-Gas Fuel Units/Part. Saved =		0 kWh
22a) Avg Additional Non-Gas Fuel Units/ Part. Used =		0 kWh
23) Number of Participants =		121,737
24) Total Annual Dth Saved =		459,252
25) Incentive/Participant =		\$34.12

Cost Summary	2023	Test Results	2023	2023
			NPV	B/C
Utility Cost per Participant =	\$95.69	Ratepayer Impact Measure Test	(\$24,445,082)	0.55
Cost per Participant per Dth =	65.30652566	Utility Cost Test	\$18,459,220	2.58
Lifetime Energy Reduction (Dth)	6,114,223	Societal Test	\$24,223,964	1.94
Societal Cost per Dth	\$0.68	Participant Test	\$38,958,620	3.12

Energy Conservation Act (ECO)

BENEFIT COST FOR GAS -- Cost-Effectiveness Analysis

Company: **Minnesota Energy Resources**
Project: **Total Portfolio w/ ECO**
BENCOST - LIW

Input Data		2023
1) Retail Rate (\$/Dth) =	\$6.57	
Escalation Rate =	4.69%	
2) Non-Gas Fuel Retail Rate (\$/Fuel Unit) =	\$0.00	
Escalation Rate =	3.59%	
Non-Gas Fuel Units (ie. kWh,Gallons, etc) =	kWh	
3) Commodity Cost (\$/Dth) =	\$3.25	
Escalation Rate =	4.69%	
4) Demand Cost (\$/Dth/Yr) =	\$131.24	
Escalation Rate =	4.69%	
5) Peak Reduction Factor =	1.00%	
6) Variable O&M (\$/Dth) =	\$0.05	
Escalation Rate =	4.69%	
7) Non-Gas Fuel Cost (\$/Fuel Unit) =	\$0.02657	
Escalation Rate =	3.59%	
8) Non-Gas Fuel Loss Factor	7.70%	
9) Gas Environmental Damage Factor (\$/Dth) =	\$2.07	
Escalation Rate =	2.30%	
10) Non Gas Fuel Enviro. Damage Factor (\$/Unit) =	\$0.01984	
Escalation Rate =	2.30%	
11) Participant Discount Rate =	3.02%	
12) ECO Utility Discount Rate =	5.57%	
13) Societal Discount Rate =	3.02%	
14) General Input Data Year =	2020	
15a) Project Analysis Year 1 =	2023	
15b) Project Analysis Year 2 =		
15c) Project Analysis Year 3 =		
16 Utility Project Costs		
16 a) Administrative & Operating Costs =		\$497,858
16 b) Incentive Costs =		\$0
16 c) Total Utility Project Costs =		\$497,858
17) Direct Participant Costs (\$/Part.) =		\$0
18) Participant Non-Energy Costs (Annual \$/Part.) =		\$0.00
Escalation Rate =		2.30%
19) Participant Non-Energy Savings (Annual \$/Part) =		\$0.00
Escalation Rate =		2.30%
20) Project Life (Years) =		23.97
21) Avg. Dth/Part. Saved =		23.03
22) Avg Non-Gas Fuel Units/Part. Saved =		0 kWh
22a) Avg Additional Non-Gas Fuel Units/ Part. Used =		0 kWh
23) Number of Participants =		128
24) Total Annual Dth Saved =		2,948
25) Incentive/Participant =		\$0.00

Cost Summary	2023	Test Results	2023	2023
			NPV	B/C
Utility Cost per Participant =	\$3,889.52	Ratepayer Impact Measure Test	(\$642,191)	0.35
Cost per Participant per Dth =	168.8743944	Utility Cost Test	(\$158,247)	0.68
Lifetime Energy Reduction (Dth)	70,672	Societal Test	\$99,917	1.20
Societal Cost per Dth	\$7	Participant Test	\$645,841	n/a

Energy Conservation Act (ECO)

BENEFIT COST FOR GAS -- Cost-Effectiveness Analysis

Company: **Minnesota Energy Resources**
Project: **Total Portfolio w/ ECO**
BENCOST - 4U2

Input Data		2023
1) Retail Rate (\$/Dth) =	\$6.57	
Escalation Rate =	4.69%	
2) Non-Gas Fuel Retail Rate (\$/Fuel Unit) =	\$0.00	
Escalation Rate =	3.59%	
Non-Gas Fuel Units (ie. kWh,Gallons, etc) =	kWh	
3) Commodity Cost (\$/Dth) =	\$3.25	
Escalation Rate =	4.69%	
4) Demand Cost (\$/Dth/Yr) =	\$131.24	
Escalation Rate =	4.69%	
5) Peak Reduction Factor =	1.00%	
6) Variable O&M (\$/Dth) =	\$0.05	
Escalation Rate =	4.69%	
7) Non-Gas Fuel Cost (\$/Fuel Unit) =	\$0.02657	
Escalation Rate =	3.59%	
8) Non-Gas Fuel Loss Factor	7.70%	
9) Gas Environmental Damage Factor (\$/Dth) =	\$2.07	
Escalation Rate =	2.30%	
10) Non Gas Fuel Enviro. Damage Factor (\$/Unit) =	\$0.01984	
Escalation Rate =	2.30%	
11) Participant Discount Rate =	3.02%	
12) ECO Utility Discount Rate =	5.57%	
13) Societal Discount Rate =	3.02%	
14) General Input Data Year =	2020	
15a) Project Analysis Year 1 =	2023	
15b) Project Analysis Year 2 =		
15c) Project Analysis Year 3 =		
16 Utility Project Costs		
16 a) Administrative & Operating Costs =		\$1,003,036
16 b) Incentive Costs =		\$0
16 c) Total Utility Project Costs =		\$1,003,036
17) Direct Participant Costs (\$/Part.) =		\$0
18) Participant Non-Energy Costs (Annual \$/Part.) =		\$0.00
Escalation Rate =		2.30%
19) Participant Non-Energy Savings (Annual \$/Part) =		\$0.00
Escalation Rate =		2.30%
20) Project Life (Years) =		18.69
21) Avg. Dth/Part. Saved =		15.29
22) Avg Non-Gas Fuel Units/Part. Saved =		0 kWh
22a) Avg Additional Non-Gas Fuel Units/ Part. Used =		0 kWh
23) Number of Participants =		270
24) Total Annual Dth Saved =		4,129
25) Incentive/Participant =		\$0.00

Cost Summary	2023	Test Results	2023	2023
			NPV	B/C
Utility Cost per Participant =	\$3,714.95	Ratepayer Impact Measure Test	(\$1,163,880)	0.25
Cost per Participant per Dth =	242.8978089	Utility Cost Test	(\$624,574)	0.38
Lifetime Energy Reduction (Dth)	77,197	Societal Test	(\$367,676)	0.63
Societal Cost per Dth	12.99328373	Participant Test	\$676,559	n/a

2023

Minnesota Energy Resources Corporation - Conservation Improvement Program Incentive

Instructions:

1.) Yellow highlighted fields must be updated by the utility

Inputs	
2017 Weather-Normalized Sales (Dth)	42,269,338
2018 Weather-Normalized Sales (Dth)	43,296,161
2019 Weather-Normalized Sales (Dth)	46,575,519
3-year Weather-Normalized Sales Average (Dth)	44,047,006
1.0% Energy Savings	440,470
Increase Energy Savings per 0.1% Increase in Achievement Level	44,047
Approved ECO Budget	\$12,787,748
Approved ECO Energy Savings Goal (Dth)	456,103
Estimated Net Benefits at Energy Savings Goal	\$16,658,447
Energy savings at 1.5% (Dth)	660,705
Incentive Calibration	
Max Percent of Net Benefits Awarded	10.0%
Max Percent of Expenditures Awarded	30.0%
Earning Threshold	0.7%
Achievement Level Where Net Benefits Cap Begins	1.2%
Increase in Net Benefits Awarded Per 0.1% Increase in Achievement Level	7.5

Location:

MERC Modification 3/1/2023

MERC Modification 3/1/2023

MERC Modification 3/1/2023

Actual 2023 Achievements	
Expenditures	\$10,148,334
Energy Saved (first year Dth saved)	397,439
Net Benefits Achieved	\$19,242,041
Shared Savings Incentive Results	
Achievement Level	0.90%
Percent of Net Benefits Awarded	7.7673%
Financial Incentive Award	\$1,494,587
Incentive/First Year Dth Saved \$	\$3.7605
Incentive/Net Benefits	7.77%
Incentive/ECO Expenditures	14.73%

Estimated Incentive Levels by Achievement Level

Achievement Level (% of sales)	Energy Saved	Percent of Net Benefits Awarded	Estimated Net Benefits Achieved	Incentive Award	Average Incentive per unit Saved	Incremental Incentive Units Saved
0.0%	0	0.00%	\$0	\$0	\$0.000	-
0.1%	44,047	0.00%	\$1,608,748	\$0	\$0.000	\$0.000
0.2%	88,094	0.00%	\$3,217,496	\$0	\$0.000	\$0.000
0.3%	132,141	0.00%	\$4,826,244	\$0	\$0.000	\$0.000
0.4%	176,188	0.00%	\$6,434,991	\$0	\$0.000	\$0.000
0.5%	220,235	0.00%	\$8,043,739	\$0	\$0.000	\$0.000
0.6%	264,282	0.00%	\$9,652,487	\$0	\$0.000	\$0.000
0.7%	308,329	6.25%	\$11,261,235	\$703,827	\$2.283	\$15.979
0.8%	352,376	7.00%	\$12,869,983	\$900,899	\$2.557	\$4.474
0.9%	396,423	7.75%	\$14,478,731	\$1,122,102	\$2.831	\$5.022
1.0%	440,470	8.50%	\$16,087,479	\$1,367,436	\$3.104	\$5.570
1.1%	484,517	9.25%	\$17,696,227	\$1,636,901	\$3.378	\$6.118
1.2%	528,564	10.00%	\$19,304,974	\$1,930,497	\$3.652	\$6.666
1.3%	572,611	10.00%	\$20,913,722	\$2,091,372	\$3.652	\$3.652
1.4%	616,658	10.00%	\$22,522,470	\$2,252,247	\$3.652	\$3.652
1.5%	660,705	10.00%	\$24,131,218	\$2,413,122	\$3.652	\$3.652
1.6%	704,752	10.00%	\$25,739,966	\$2,573,997	\$3.652	\$3.652
1.7%	748,799	10.00%	\$27,348,714	\$2,734,871	\$3.652	\$3.652
1.8%	792,846	10.00%	\$28,957,462	\$2,895,746	\$3.652	\$3.652
1.9%	836,893	10.00%	\$30,566,210	\$3,056,621	\$3.652	\$3.652
2.0%	880,940	10.00%	\$32,174,957	\$3,217,496	\$3.652	\$3.652
2.1%	924,987	10.00%	\$33,783,705	\$3,378,371	\$3.652	\$3.652
2.2%	969,034	10.00%	\$35,392,453	\$3,539,245	\$3.652	\$3.652
2.3%	1,013,081	10.00%	\$37,001,201	\$3,700,120	\$3.652	\$3.652
2.4%	1,057,128	10.00%	\$38,609,949	\$3,860,995	\$3.652	\$3.652
2.5%	1,101,175	10.00%	\$40,218,697	\$4,021,870	\$3.652	\$3.652
2.6%	1,145,222	10.00%	\$41,827,445	\$4,182,744	\$3.652	\$3.652
2.7%	1,189,269	10.00%	\$43,436,193	\$4,343,619	\$3.652	\$3.652
2.8%	1,233,316	10.00%	\$45,044,940	\$4,504,494	\$3.652	\$3.652
2.9%	1,277,363	10.00%	\$46,653,688	\$4,665,369	\$3.652	\$3.652
3.0%	1,321,410	10.00%	\$48,262,436	\$4,826,244	\$3.652	\$3.652

Attachment C

CCRA Calculation

MERC
CCRA Calculation
To Be Effective January 1, 2025

Forecasted beginning balance (January 1, 2025)	\$	(519,021)
Forecasted Expenditures (January 2025-December 2025)*	\$	15,394,988
2023 Incentive (to be approved in 2024)	\$	1,494,587
Forecasted 2024 Incentive (based on current approved 2024)	\$	1,216,044
Less forecasted CCRC recovery (January 2025-December 2025)	\$	12,366,379
Projected carrying charges for 2025	\$	4,937
Forecasted December 2025 Balance	\$	5,225,155
Forecasted gas sales (January 2025-December 2025) Therms		428,050,511
CCRA=\$/therm beginning January 1, 2025	\$	0.01221

Attachment D

Revised Tariff Sheets

Clean Tariff Sheet

All Classes MERC \$0.01221*

*Approved effective January 1, 2025 in Docket No. G011/M-24-46

5. Exemption: For those customer accounts granted an exemption by the Commissioner of the Minnesota Department of Commerce (or successor agency) from Conservation Improvement Program (CIP) costs pursuant to Minnesota Statutes section 216B.241, the CCRC and CCRA shall not apply. Those customer accounts determined by the Commission to qualify as a Large Energy Facility Customers, shall receive a monthly exemption from conservation program charges pursuant to Minn. Stat. § 216B.16, subd. 6b Energy Conservation Improvement. Upon exemption from conservation program charges, the Large Energy Facility customers can no longer participate in any utility's energy Conservation Improvement Program.

Under Minn. Stat. 216B.241, any customer account determined by the Commission of the Minnesota Department of Commerce to qualify as a large customer facility shall be exempt from CIP investment and expenditure requirements with respect to retail revenues attributable to the large customer facility. Customer accounts granted exemption by a decision of the Commissioner after the beginning of the calendar year shall be credited for any CIP collections billed after January first of the year following the Commissioner's decision. Upon exemption from the conservation program charges, no exempt customer facility may participate in a utility conservation improvement program unless the owner of the facility submits a filing with the Commissioner to withdraw its exemption.

Under Minn. Stat. 216B.241, any customer account that is not a large customer facility and that purchases or acquires natural gas from a public utility having fewer than 600,000 natural gas customers in Minnesota shall, upon a determination by the Commissioner of the Department of Commerce as qualifying for an opt out of the Conservation Improvement Program, be exempt from CIP investment and expenditure requirements with respect to retail revenues attributable to the commercial gas customers. Customer accounts granted exemption by a decision of the Commissioner after the beginning of the calendar year shall be credited for any CIP collections billed after January first of the year following the Commissioner's decision. Upon exemption from conservation program charges, the customers can no longer participate in any utility's energy Conservation Improvement Program unless the customer submits a filing with the Commissioner to withdraw its exemption.

6. Accounting Requirements: The Company is required to record all costs associated with the conservation program in a CIP Tracker Account. All revenues recovered through the CCRA are booked to the Tracker as an offset to expenses.

Redlined Tariff Sheet

CONSERVATION COST RECOVERY CHARGE AND ADJUSTMENT

12~~4~~⁵th Revised Sheet No. 7.02a

All Classes MERC \$0.01~~2210455~~⁵⁵*

*Approved effective January 1, 202~~5~~⁴ in Docket No. G011/M-24~~3-46~~¹⁸³

5. **Exemption:** For those customer accounts granted an exemption by the Commissioner of the Minnesota Department of Commerce (or successor agency) from Conservation Improvement Program (CIP) costs pursuant to Minnesota Statutes section 216B.241, the CCRC and CCRA shall not apply. Those customer accounts determined by the Commission to qualify as a Large Energy Facility Customers, shall receive a monthly exemption from conservation program charges pursuant to Minn. Stat. § 216B.16, subd. 6b Energy Conservation Improvement. Upon exemption from conservation program charges, the Large Energy Facility customers can no longer participate in any utility's energy Conservation Improvement Program.

Under Minn. Stat. 216B.241, any customer account determined by the Commission of the Minnesota Department of Commerce to qualify as a large customer facility shall be exempt from CIP investment and expenditure requirements with respect to retail revenues attributable to the large customer facility. Customer accounts granted exemption by a decision of the Commissioner after the beginning of the calendar year shall be credited for any CIP collections billed after January first of the year following the Commissioner's decision. Upon exemption from the conservation program charges, no exempt customer facility may participate in a utility conservation improvement program unless the owner of the facility submits a filing with the Commissioner to withdraw its exemption.

Under Minn. Stat. 216B.241, any customer account that is not a large customer facility and that purchases or acquires natural gas from a public utility having fewer than 600,000 natural gas customers in Minnesota shall, upon a determination by the Commissioner of the Department of Commerce as qualifying for an opt out of the Conservation Improvement Program, be exempt from CIP investment and expenditure requirements with respect to retail revenues attributable to the commercial gas customers. Customer accounts granted exemption by a decision of the Commissioner after the beginning of the calendar year shall be credited for any CIP collections billed after January first of the year following the Commissioner's decision. Upon exemption from conservation program charges, the customers can no longer participate in any utility's energy Conservation Improvement Program unless the customer submits a filing with the Commissioner to withdraw its exemption.

6. **Accounting Requirements:** The Company is required to record all costs associated with the conservation program in a CIP Tracker Account. All revenues recovered through the CCRA are booked to the Tracker as an offset to expenses.

**In the Matter of the Petition of Minnesota Energy
Resources Corporation for Approval of the 2023
Conservation Improvement Program Tracker
Account, Demand-Side Management Financial
Incentive, and Conservation Cost Recovery
Adjustment Factor**

Docket No. G011/M-24-46

CERTIFICATE OF SERVICE

I, Kristin M. Stastny, hereby certify that on the 1st day of May, 2024, on behalf of Minnesota Energy Resources Corporation (MERC) I electronically filed a true and correct copy of the enclosed Petition on www.edockets.state.mn.us. Said documents were also served via U.S. mail and electronic service as designated on the attached service list.

Dated this 1st day of May, 2024.

/s/ Kristin M. Stastny

Kristin M. Stastny

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Tom	Balster	tombalster@alliantenergy.com	Interstate Power & Light Company	PO Box 351 200 1st St SE Cedar Rapids, IA 524060351	Electronic Service	No	OFF_SL_24-46_M-24-46
Lisa	Beckner	lbeckner@mnpower.com	Minnesota Power	30 W Superior St Duluth, MN 55802	Electronic Service	No	OFF_SL_24-46_M-24-46
William	Black	bblack@mmua.org	MMUA	Suite 200 3131 Fernbrook Lane North Plymouth, MN 55447	Electronic Service	No	OFF_SL_24-46_M-24-46
Christina	Brusven	cbrusven@fredlaw.com	Fredrikson Byron	60 S 6th St Ste 1500 Minneapolis, MN 55402-4400	Electronic Service	No	OFF_SL_24-46_M-24-46
Ray	Choquette	rchoquette@agp.com	Ag Processing Inc.	12700 West Dodge Road PO Box 2047 Omaha, NE 68103-2047	Electronic Service	No	OFF_SL_24-46_M-24-46
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_24-46_M-24-46
George	Crocker	gwillc@nawo.org	North American Water Office	5093 Keats Avenue Lake Elmo, MN 55042	Electronic Service	No	OFF_SL_24-46_M-24-46
Patrick	Deal	pdeal@mnchamber.com	Minnesota Chamber of Commerce	400 Robert St N Ste 1500 Saint Paul, MN 55101	Electronic Service	No	OFF_SL_24-46_M-24-46
Steve	Downer	sdowner@mmua.org	MMUA	3025 Harbor Ln N Ste 400 Plymouth, MN 554475142	Electronic Service	No	OFF_SL_24-46_M-24-46
Charles	Drayton	charles.drayton@enbridge.com	Enbridge Energy Company, Inc.	7701 France Ave S Ste 600 Edina, MN 55435	Electronic Service	No	OFF_SL_24-46_M-24-46

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Jim	Erchul	jerschul@dbnhs.org	Daytons Bluff Neighborhood Housing Sv.	823 E 7th St St. Paul, MN 55106	Electronic Service	No	OFF_SL_24-46_M-24-46
Greg	Ernst	gaernst@q.com	G. A. Ernst & Associates, Inc.	2377 Union Lake Trl Northfield, MN 55057	Electronic Service	No	OFF_SL_24-46_M-24-46
Melissa S	Feine	melissa.feine@semcac.org	SEMCAC	PO Box 549 204 S Elm St Rushford, MN 55971	Electronic Service	No	OFF_SL_24-46_M-24-46
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 551012198	Electronic Service	No	OFF_SL_24-46_M-24-46
Karolanne	Foley	Karolanne.foley@dairylandpower.com	Dairyland Power Cooperative	PO Box 817 La Crosse, WI 54602-0817	Electronic Service	No	OFF_SL_24-46_M-24-46
Tyler	Glewwe	Tyler.Glewwe@centerpointenergy.com	CenterPoint Energy	505 Nicollet Mall Minneapolis, MN 55402	Electronic Service	No	OFF_SL_24-46_M-24-46
Jenny	Glumack	jenny@mrea.org	Minnesota Rural Electric Association	11640 73rd Ave N Maple Grove, MN 55369	Electronic Service	No	OFF_SL_24-46_M-24-46
Jason	Grenier	jgrenier@otpc.com	Otter Tail Power Company	215 South Cascade Street Fergus Falls, MN 56537	Electronic Service	No	OFF_SL_24-46_M-24-46
Jeffrey	Haase	jhaase@grenergy.com	Great River Energy	12300 Elm Creek Blvd Maple Grove, MN 55369	Electronic Service	No	OFF_SL_24-46_M-24-46
Patty	Hanson	phanson@rpu.org	Rochester Public Utilities	4000 E River Rd NE Rochester, MN 55906	Electronic Service	No	OFF_SL_24-46_M-24-46

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Jared	Hendricks	jared.hendricks@owatonnautilities.com	Owatonna Municipal Public Utilities	PO Box 800 208 S Walnut Ave Owatonna, MN 55060-2940	Electronic Service	No	OFF_SL_24-46_M-24-46
Joe	Hoffman	ja.hoffman@smmpa.org	SMMPA	500 First Ave SW Rochester, MN 55902-3303	Electronic Service	No	OFF_SL_24-46_M-24-46
Dave	Johnson	dave.johnson@aeoa.org	Arrowhead Economic Opportunity Agency	702 3rd Ave S Virginia, MN 55792	Electronic Service	No	OFF_SL_24-46_M-24-46
Martin	Kapsch	martin.kapsch@centerpointenergy.com	CenterPoint Energy Minnesota Gas	505 Nicollet Mall Minneapolis, MN 55402	Electronic Service	No	OFF_SL_24-46_M-24-46
Deborah	Knoll	dknoll@mnpower.com	Minnesota Power	30 W Superior St Duluth, MN 55802	Electronic Service	No	OFF_SL_24-46_M-24-46
Kathryn	Knudson	kathryn.knudson@centerpointenergy.com	CenterPoint Energy Minnesota Gas	N/A	Electronic Service	No	OFF_SL_24-46_M-24-46
Tina	Koecher	tkoecher@mnpower.com	Minnesota Power	30 W Superior St Duluth, MN 558022093	Electronic Service	No	OFF_SL_24-46_M-24-46
Martin	Lepak	Martin.Lepak@aeoa.org	Arrowhead Economic Opportunity	702 S 3rd Ave Virginia, MN 55792	Electronic Service	No	OFF_SL_24-46_M-24-46
Corey	Lubovich	coreyl@hpuc.com	Hibbing Public Utilities Commission	1902 6th Ave E Hibbing, MN 55746	Electronic Service	No	OFF_SL_24-46_M-24-46
Scot	McClure	scotmcclure@alliantenergy.com	Interstate Power And Light Company	4902 N Biltmore Ln PO Box 77007 Madison, WI 537071007	Electronic Service	No	OFF_SL_24-46_M-24-46

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
David	Moeller	dmoeller@allte.com	Minnesota Power	30 W Superior St Duluth, MN 558022093	Electronic Service	No	OFF_SL_24-46_M-24-46
Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP	33 South Sixth St Ste 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_24-46_M-24-46
Carl	Nelson	cnelson@mncee.org	Center for Energy and Environment	212 3rd Ave N Ste 560 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_24-46_M-24-46
Samantha	Norris	samanthanorris@alliantenergy.com	Interstate Power and Light Company	200 1st Street SE PO Box 351 Cedar Rapids, IA 524060351	Electronic Service	No	OFF_SL_24-46_M-24-46
Audrey	Partridge	apartridge@mncee.org	Center for Energy and Environment	212 3rd Ave. N. Suite 560 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_24-46_M-24-46
Lisa	Pickard	lseverson@minnkota.com	Minnkota Power Cooperative	5301 32nd Ave S Grand Forks, ND 58201	Electronic Service	No	OFF_SL_24-46_M-24-46
Bill	Poppert	info@technologycos.com	Technology North	2433 Highwood Ave St. Paul, MN 55119	Electronic Service	No	OFF_SL_24-46_M-24-46
Dave	Reinke	dreinke@dakotaelectric.com	Dakota Electric Association	4300 220th St W Farmington, MN 55024-9583	Electronic Service	No	OFF_SL_24-46_M-24-46
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_24-46_M-24-46
Jean	Schafer	jeans@bepc.com	Basin Electric Power Cooperative	1717 E Interstate Ave Bismarck, ND 58501	Electronic Service	No	OFF_SL_24-46_M-24-46

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Christine	Schwartz	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_24-46_M-24-46
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th PI E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_24-46_M-24-46
Rick	Sisk	RSisk@trccompanies.com	Lockheed Martin	1000 Clark Ave. St. Louis, MO 63102	Electronic Service	No	OFF_SL_24-46_M-24-46
Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.	76 W Kellogg Blvd St. Paul, MN 55102	Electronic Service	No	OFF_SL_24-46_M-24-46
Anna	Sommer	ASommer@energyfuturesgroup.com	Energy Futures Group	PO Box 692 Canton, NY 13617	Electronic Service	No	OFF_SL_24-46_M-24-46
Russ	Stark	Russ.Stark@ci.stpaul.mn.us	City of St. Paul	Mayor's Office 15 W. Kellogg Blvd., Suite 390 Saint Paul, MN 55102	Electronic Service	No	OFF_SL_24-46_M-24-46
Kodi	Verhalen	kverhalen@taftlaw.com	Taft Stettinius & Hollister LLP	80 S 8th St Ste 2200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_24-46_M-24-46
Michael	Volker	mvolker@eastriver.coop	East River Electric Power Coop	211 S. Harth Ave Madison, SD 57042	Electronic Service	No	OFF_SL_24-46_M-24-46
Sharon N.	Walsh	swalsh@shakopeeutilities.com	Shakopee Public Utilities	255 Sarazin St Shakopee, MN 55379	Electronic Service	No	OFF_SL_24-46_M-24-46
Ethan	Warner	ethan.warner@centerpointenergy.com	CenterPoint Energy	505 Nicollet Mall Minneapolis, MN 55402	Electronic Service	No	OFF_SL_24-46_M-24-46

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Robyn	Woeste	robynwoeste@alliantenergy.com	Interstate Power and Light Company	200 First St SE Cedar Rapids, IA 52401	Electronic Service	No	OFF_SL_24-46_M-24-46

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Tom	Balster	tombalster@alliantenergy.com	Interstate Power & Light Company	PO Box 351 200 1st St SE Cedar Rapids, IA 524060351	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Lisa	Beckner	lbeckner@mnpower.com	Minnesota Power	30 W Superior St Duluth, MN 55802	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
William	Black	bblack@mmua.org	MMUA	Suite 200 3131 Fernbrook Lane North Plymouth, MN 55447	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Christina	Brusven	cbrusven@fredlaw.com	Fredrikson Byron	60 S 6th St Ste 1500 Minneapolis, MN 55402-4400	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
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Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
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