

May 24, 2018

Daniel P. Wolf  
Executive Secretary  
Minnesota Public Utilities Commission  
121 7th Place East  
St. Paul, Minnesota 55101-2147

RE: **Comments of the Minnesota Department of Commerce, Division of Energy Resources**  
Docket No. E017/GR-15-1033

Dear Mr. Wolf:

Attached are the *Comments* of the Minnesota Department of Commerce, Division of Energy Resources (Department) in the following matter:

Joint Request by Otter Tail Power Company (Otter Tail or the Company) and the Minnesota Chamber of Commerce (the Chamber) to Reopen Order Approving Compliance Filing in Otter Tail's 2015 General Rate case.

The Joint Request was filed on March 30, 2018. The petitioners were:

Cary Stephenson  
Associate General Counsel  
Otter Tail Power Company  
215 South Cascade Street  
Fergus Falls, MN 56538-0496

and

Richard J. Savelkoul  
Attorney on behalf of the Minnesota Chamber of Commerce  
332 Minnesota Street, Suite W2750  
St. Paul, MN 55101

Based on its analysis, the Department concludes that, to date, Otter Tail has not met its burden of proof to show why the rates approved in the Company's most recent rate case must be changed. However, the Department remains open to considering further information from Otter Tail in Reply Comments, including:

- a detailed discussion of what, if any, harm has occurred, or may likely occur in the near future, because of current LGS rates;
- why the issues with current rates exist;
- how Otter Tail apportioned revenue responsibility within subclasses of the LGS class;
- how Otter Tail's proposed rates would result in better outcomes; and
- anything else Otter Tail believes will help the Company demonstrate that its proposal is reasonable.

The Department is available to answer any questions the Commission may have.

Sincerely,

/s/ ADAM J. HEINEN  
Rates Analyst  
651-539-1825

AJH/lt  
Attachment



## Before the Minnesota Public Utilities Commission

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### Comments of the Minnesota Department of Commerce Division of Energy Resources

Docket No. E017/GR-15-1033

#### I. BACKGROUND

On February 16, 2016, Otter Tail Power Company (Otter Tail or the Company) filed its 2015 general rate case in this docket. The Company proposed various changes to rates, rate design, and other regulatory items, and other parties in the rate case subsequently filed testimony responding to Otter Tail's proposals. Of particular relevance to the analysis in these comments, Otter Tail and the Minnesota Chamber of Commerce (Chamber) entered into an agreement on October 14, 2016 regarding rate design for the Large General Service (LGS) rate class (LGS Agreement).<sup>1</sup> The LGS Agreement was based, in large part, on the Chamber's LGS rate design position presented in testimony. The LGS Agreement proposed moving rates closer to marginal cost, to improve price signals for Time of Day (TOD) rate groups, maintain consistency with the Company's overall rate design goals, and maintain the relationship between TOD energy rates and Standby Service energy rates.

On May 1, 2017, the Minnesota Public Utilities Commission (Commission) issued its *Findings of Fact, Conclusions, and Order* (Order) in the 2015 general rate case. In this Order, the Commission approved, in relevant part to these comments, the LGS rate design included in the LGS Agreement as the basis for setting rates for this rate class. On August 21, 2017, the Company filed its *Rate Case Compliance Filing* (Compliance Filing) detailing and implementing the Commission's changes set forth in its May 1, 2017 Order, including rate design changes for the LGS rate class. There were no issues raised regarding the LGS rates presented in the Compliance Filing and final rates were implemented effective November 1, 2017.

On March 30, 2018, Otter Tail and the Chamber filed a *Joint Request to Reopen Order Approving Compliance Filing* (Joint Request). In this Joint Request, the parties notified the Commission of their concerns with implementation of final rates for the LGS rate class. Subsequent to implementation of final rates, the Company observed what it describes as "unintended and unreasonable effects that arose from incorporating the final-approved sales and revenues in the LGS rates as part of Otter Tail's August 21, 2017 Compliance filing."<sup>2</sup> More specifically, the Joint Request states that the "rates approved in the Compliance Order for the LGS class have resulted in significant and unintended bill increases for certain LGS customers that provide

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<sup>1</sup> The Minnesota Department of Commerce, Division of Energy Resources, notes that the Company incorrectly stated in its March 30, 2018 Joint Request that the LGS Agreement was filed on October 30, 2016.

<sup>2</sup> Joint Request, page 1.

unintended and inappropriate signals for LGS customers to migrate away from TOD service and to change voltage levels.”<sup>3</sup> The Company states that “These price signals are directly contrary to the intent and principles of the LGS Agreement and to rate design fundamentals.”<sup>4</sup> Otter Tail and the Chamber requested that the Commission reopen the Compliance Order and approve revised LGS rates so as to: avoid the unintended bill increases for some LGS customers and align the LGS rate design with the principles of the LGS Agreement and rate design fundamentals.

The Department provides its analysis of the Joint Request and proposed rate design changes below.

## **II. DEPARTMENT’S ANALYSIS OF THE JOINT REQUEST**

The Department reviewed the Joint Request and was unable to identify detailed information clarifying the statements related to: 1) tying the “intent and principles” of the LGS Agreement to the proposed rate design in the Joint Request, 2) what led to the “unanticipated and unidentified effects” 3) an adequate explanation as to why the issue “arose from incorporating the final-approved sales and revenues in the LGS rates” in Otter Tail’s Compliance filing, or 4) why the current proposal would result in an appropriate outcome. Given this lack of clarity, the Department issued discovery.

In its response to Department Information Request No. 322, Otter Tail provided its interpretation of the “intent and principles” of the LGS Agreement (Department Attachment 1). Otter Tail stated that the LGS Agreement was intended to move rates closer to marginal cost and improve price signals for the TOD rate groups. The Company also clarified that the LGS Agreement was based largely on the Chamber’s recommended LGS rate design and that the Chamber’s rate design witness testified that its recommended LGS rate design was intended to mitigate risk of customers switching to non-TOD rates. As discussed in greater detail below, the current rate design does not, according to the parties, mitigate the risk of customers switching to non-TOD rates, which is opposite of the intention of the LGS Agreement.

In its responses to Department Information Request Nos. 323 and 327, the Company provided a detailed discussion of the circumstances that led to the “unintended and unreasonable rate increases” referenced in the Joint Request (Department Attachments 2 and 3). In these responses, Otter Tail noted that the rate design for the LGS rate class in the August 21, 2017 Compliance Filing, which was approved by the Commission and used to set final rates, included a 2.21 percent rate increase for the LGS-Primary rate group and a 9.44 percent rate increase for the LGS Time of Day-Primary rate group. Otter Tail stated that “These rate changes resulted in an unintended price signal for primary customers to move from Time of Day service to non-

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<sup>3</sup> *Id.* at 2.

<sup>4</sup> *Id.*

Time of Day service.” However, the Company did not explain why this outcome was not understood at that time, given Otter Tail’s knowledge of its customers.

More importantly, the Company did not explain why its implementation of a higher level of sales for the LGS class as a whole resulted in a different apportionment of revenue responsibility among sub-components of the LGS class. In addition, Otter Tail noted that the relationship between voltage levels in the Compliance Filing did not follow marginal cost. The Company stated that its 2016 Marginal Cost Study<sup>5</sup> shows that the marginal costs of secondary service are greater than primary service, which in turn has higher costs than transmission service. However, the Compliance Filing included rates for TOD-Primary service that were higher than TOD-Secondary rates. Otter Tail stated that the unintended and unreasonable rate increases arose as a result of the incorporation of final-approved sales and revenue in the August 21, 2017 Compliance Filing, which were based on the Department’s recommended sales and revenue figures, while the LGS Agreement was developed based on the Company’s originally proposed sales and revenues. Otter Tail stated that the Compliance Filing held intra-class revenue allocation of the LGS Agreement constant; however, once sales and revenues were changed, the Company should have reviewed the LGS Agreement to see whether the sales changes had implications on the LGS class rates. This response is missing a key factor. Since the sales increase approved by the Commission was for the LGS class as a whole, the Company still has not explained why there were differing rate effects among sub-groups of the LGS class.

Finally, even if there were a clear explanation of these issues, Otter Tail’s proposal does not explain why its current proposal would be reasonable. For example, given Otter Tail’s concerns about customers switching from TOD to non-TOD rates, the Company has not explained why it is reasonable to increase apportionment of revenue responsibility for LGS TOD-Secondary and LGS TOD-Transmission customers compared to the rates in the Company’s Compliance filing. (See Table 2 of Otter Tail’s response to Information Request No. 327 in Attachment 3 of these comments.)

Based on these discovery responses, the Department believes that the statements in the Joint Request that final rates included “unanticipated and unidentified effects” and that the rates were “unintended and unreasonable” do not adequately explain what occurred with LGS rates. Without that explanation, it is unclear whether the currently proposed rate changes are simply corrections of errors or a new rate design.

As noted in its response to Department Information Request No. 323, Otter Tail failed to analyze whether the Compliance Filing, and the subsequent final rates approved by the Commission, resulted in rate changes that conformed to the LGS Agreement and generally produced price signals that conformed to the 2016 Marginal Cost Study.

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<sup>5</sup> February 16, 2016 Direct Testimony of Otter Tail Witness Mr. David Prazak, Schedule 4.

Since Otter Tail did not explain why the Company was not aware of these issues sooner and since the concerns about rates cannot truly be classified as “unexpected changes,” the Department requested additional information on when the Company identified these rate issues. In response to Department Information Requests No. 326 and 328 (Department Attachments 4 and 5), Otter Tail explained that it began analyzing final LGS rates in late October 2017, just prior to the implementation of final rates, in preparation for meetings with large customers in early November 2017. An industrial customer expressed interest in changing to non-TOD transmission service due to potential bill savings.<sup>6</sup> Despite the decreased rates, Otter Tail explained that this would be an inefficient decision by the customer because the transmission rate was constructed to account for the single customer in the rate group,<sup>7</sup> and the large customer considering a change in rate group would have to make additional equipment investments. After this customer meeting, Otter Tail performed additional analysis of potential rate impacts to large customers in November and December and found that its final rates were creating unintended price signals to TOD service customers and signals to change voltages in a way that are not consistent with marginal costs. Given this information, the Company and the Chamber began collaborating on a revised rate design in January 2018. This information indicates that Otter Tail did not take necessary steps prior to implementing final rates to identify potential issues with the application of the rates.

Otter Tail now proposes the modified rates indicated in the Joint Request.<sup>8</sup> Just as with any proposed change in its rates, the burden is on Otter Tail to show why the proposed change is reasonable. As discussed above, the Department concludes that the Company has not met that burden of proof. To remedy this failing, Otter Tail should provide at a minimum, in *Reply Comments*:

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<sup>6</sup> Joint Request, Exhibit 1. The approved rate changes for the Transmission Service-Primary is an 8.05 percent decrease in rates.

<sup>7</sup> In an informal discussion with Otter Tail, the Company explained that it made various assumptions when determining rates for the Transmission rate group. For example, since there is only one customer receiving service under the Non-TOD Transmission rate group, Otter Tail made various assumptions to create rates representative of a rate group with a critical mass of customers.

<sup>8</sup> Joint Request, Exhibit 2.

- a detailed discussion of what, if any, harm has occurred, or may likely occur in the near future, because of current LGS rates;
- why the issues with current rates exist;
- how Otter Tail apportioned revenue responsibility within subclasses of the LGS class;
- how Otter Tail's proposed rates would result in better outcomes; and
- anything else Otter Tail believes will help the Company demonstrate that its proposal is reasonable.

### **III. CONCLUSIONS AND RECOMMENDATIONS**

Based on its analysis, the Department concludes that, to date, Otter Tail has not met its burden of proof to show why the rates approved in the Company's most recent rate case must be changed. However, the Department remains open to considering further information from Otter Tail in Reply Comments, including:

- a detailed discussion of what, if any, harm has occurred, or may likely occur in the near future, because of current LGS rates,
- why the issues with current rates exist,
- how Otter Tail apportioned revenue responsibility within subclasses of the LGS class,
- how Otter Tail's proposed rates would result in better outcomes, and
- anything else Otter Tail believes will help the Company demonstrate that its proposal is reasonable.

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OTTER TAIL POWER COMPANY  
Docket No: E017/GR-15-1033

Response to: Minnesota Department of Commerce

Analyst: Adam Heinen

Date Received: 04/09/2018

Date Due: 04/19/2018

Date of Response: 04/19/2018

Responding Witness: David G. Prazak, Supervisor, Pricing & Tariff Administration - (218) 739-8595

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Information Request:

Please provide your interpretation of the “intent and principles” of the October 14, 2016 LGS Rate Design Agreement between Otter Tail and the Minnesota Chamber of Commerce.

If this information has already been provided in testimony or in response to an earlier Department-DER information request, please identify the specific cite(s) or Department-DER information request number(s).

Attachments: 0

Response:

As discussed in the second paragraph of the October 14, 2016 LGS Rate Design Agreement,<sup>1</sup> the Agreement was intended to “move rates closer to marginal cost and improve price signals for the LGS-Time of Day rate group.” This was also noted in the testimony summary of OTP witness Mr. David G. Prazak.<sup>2</sup>

The LGS Rate Design Agreement was based largely on the Chamber’s recommended LGS class rate design. Chamber witness Ms. Kavita Maini testified that the Chamber’s recommended LGS class rate design was intended to mitigate the risk of customers switching to non-Time of day rates.<sup>3</sup>

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<sup>1</sup> The LGS Rate Design Agreement was admitted as hearing Exhibit 60 (Public) and Exhibit 61 (Trade Secret).

<sup>2</sup> Ex. 58 at 2 (Prazak Testimony Summary).

<sup>3</sup> Ex. 106 at 30-31, 35 (Maini Direct).



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Information Request:

Please provide a detailed discussion of the circumstances that led to the “unintended and unreasonable rate increases” and how these rates have, or will, incentivize certain customers to modify their service characteristics.

If this information has already been provided in testimony or in response to an earlier Department-DER information request, please identify the specific cite(s) or Department-DER information request number(s).

Attachments: 0

Response:

Attachment 2A, page 2 (Schedule E-1) of OTP’s August 21, 2017 Compliance Filing identified the percent changes in revenues for each LGS rate group. That schedule showed, for example, that LGS-Primary revenues were to increase 2.21%, while LGS Time of Day -Primary rates were to increase 9.44%. This resulted in an unintended price signal for primary customers to move from Time of Day service to non-Time of Day service.

Attachment 3A, page 5 (Schedule E-2) of OTP’s August 21, 2017 Compliance Filing also showed that the relationships among voltage levels did not follow marginal cost. As noted in the Joint Request, Otter Tail’s 2016 Marginal Cost Study shows that the marginal costs of secondary service are greater than the marginal costs of primary service, which in turn has higher marginal costs than transmission service. These cost differences are due to losses and because as Otter Tail delivers power deeper into the distribution system, more facilities are required to provide service and therefore has higher marginal costs.<sup>1</sup> Yet, in the Compliance Filing, LGS Time of Day - Primary rates were higher than LGS Time of Day – Secondary rates.

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<sup>1</sup> Joint Request, p. 3, n. 7.

As discussed in the Joint Request, the unintended and unreasonable rate increases arose as a result of the incorporation of the final-approved sales and revenues into the LGS rates as part of Otter Tail's August 21, 2017 Compliance Filing. OTP's response to MN-DOC-327 discusses in more detail that the LGS Rate Agreement was developed based on OTP's proposed sales and present revenues. The Compliance Filing was based on the Department's sales and associated present revenues, consistent with the Commission's Order.<sup>2</sup> The Compliance Filing held the intra-class revenue allocation of the LGS Rate Agreement constant, which, when combined with the Department's sales and associated present revenues, resulted in unintended changes to the relationships among the LGS rate groups. Once sales and associated present revenues changed, OTP should have revisited the LGS Rate Agreement to assess the implications on the agreed upon outcome for LGS class rates. OTP apologizes for this oversight. The Joint Request addresses the issues associated with the Compliance Filing and results in a rate design that moves rates closer to marginal cost and improves price signals for the LGS-Time of Day rate group, consistent the purpose of the LGS Rate Agreement.

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<sup>2</sup> May 1 Order at Order Point 28.

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Information Request:

- A. Please fully explain how the revenue apportionment discussed in the above reference was determined. To the extent that any sub-class deviated from the Company's 2016 Marginal Cost Study, please fully explain why this occurred and why it was necessary.
- B. Please fully explain whether the revenue apportionment proposed in the above reference is the same as proposed in the October 14, 2016 LGS Rate Agreement. To the extent that any sub-class deviates from the LGS Rate Agreement, please fully explain why this occurred and why it is necessary.

If this information has already been provided in testimony or in response to an earlier Department-DER information request, please identify the specific cite(s) or Department-DER information request number(s).

Attachments: 0

Response:

- A. The Joint Request revenue apportionment was based on the Department's sales and associated present revenues, consistent with the Commission's Order, and the marginal cost framework for offered voltage levels. The intended revenue allocation results in appropriate levels of revenue targets for each rate sub-class. The LGS sub-classes are organized by the type of rate (Time of Day and non-Time of Day) as well as their voltage level (secondary, primary and transmission). Rates for each voltage level must not only reflect their marginal costs but also achieve the revenue requirement based on their efficiency level (i.e. how closely rates result in revenues based entirely on marginal costs) and associated billing determinants. If a rate is designated to have a low efficiency level, it will receive a higher rate increase than a rate designated at a high efficiency level. Revenue among the LGS sub-classes must balance all these criteria in order to develop the overall revenue allocation.

B. The Joint Request intra-class revenue apportionment is not the same as proposed in the October 14, 2016 LGS Rate Agreement. The table below compares the intra-class revenue apportionment of the LGS Rate Agreement, Compliance Filing and Joint Request. As shown in that table, the LGS Rate Agreement and Compliance Filing had the same intra-class revenue apportionment. This approach would have been appropriate had the LGS Rate Agreement and Compliance Filing been based on the same sales and present revenues. The LGS Rate Agreement was developed based on OTP's sales and present revenue calculation: the Compliance Filing was based on the Department's sales and associated present revenues, consistent with the Commission's Order.<sup>1</sup> With the change in sales and present revenues, holding the intra-class revenue appointment constant between the LGS Rate Agreement and the Compliance Filing resulted in unintended distortions of the intra-class revenue responsibilities.

Class	LGS Rate Agreement	Compliance Filing	Joint Request
LGS - Secondary	26.01%	26.01%	25.51%
LGS - Primary	3.65%	3.65%	3.70%
LGS - Transmission	0.27%	0.27%	0.30%
LGS TOD - Secondary	9.59%	9.59%	9.68%
LGS TOD - Primary	14.17%	14.17%	13.40%
LGS TOD - Transmission	46.33%	46.33%	47.42%

Class	LGS Rate Agreement		Compliance Filing		Joint Request	
	Percent	Ratio To Overall Class Increase	Percent	Ratio To Overall Class Increase	Percent	Ratio To Overall Class Increase
LGS - Secondary	11.10%	1.23	11.37%	2.15	9.24%	1.75
LGS - Primary	8.60%	0.96	2.12%	0.40	3.54%	0.67
LGS - Transmission	-2.40%	(0.27)	-8.05%	(1.52)	4.00%	0.76
LGS TOD - Secondary	10.20%	1.13	4.22%	0.80	5.20%	0.98
LGS TOD - Primary	11.40%	1.27	9.44%	1.78	3.51%	0.66
LGS TOD - Transmission	7.00%	0.78	1.54%	0.29	3.93%	0.74

<sup>1</sup> May 1 Order at Order Point 28.

The Joint Request intra-class revenue allocation does deviate from the LGS Rate Agreement. These deviations are necessary to maintain the appropriate relationships between voltage levels and to accomplish the goal of moving rates closer to marginal cost and improve price signals for the LGS-Time of Day rate group.

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Information Request:

Please fully explain how the rates approved in the compliance order resulted in significant and unintended bill increases. As part of this response, please fully explain when, during the rate case process, Otter Tail reached out to ratepayers regarding potential changes in rates.

If this information has already been provided in testimony or in response to an earlier Department-DER information request, please identify the specific cite(s) or Department-DER information request number(s).

Attachments: 0

Response:

As shown in the table below, the LGS Rate Agreement resulted in intra-class percentage increases that ranged from 1.27 times the overall class increase to (0.27) times the overall class increase. The Compliance Filing, however, included intra-class percentage increases that ranged from 2.15 times the overall class increase to (1.52) times the overall class increase. The Joint Request has intra-class percentage increases that are much better aligned with the LGS Rate Agreement and overall increases that are more consistent with the overall class increase.

Class	LGS Rate Agreement		Compliance Filing		Joint Request	
	Percent	Ratio To Overall Class Increase	Percent	Ratio To Overall Class Increase	Percent	Ratio To Overall Class Increase
LGS - Secondary	11.10%	1.23	11.37%	2.15	9.24%	1.75
LGS - Primary	8.60%	0.96	2.12%	0.40	3.54%	0.67
LGS - Transmission	-2.40%	(0.27)	-8.05%	(1.52)	4.00%	0.76
LGS TOD - Secondary	10.20%	1.13	4.22%	0.80	5.20%	0.98
LGS TOD - Primary	11.40%	1.27	9.44%	1.78	3.51%	0.66
LGS TOD - Transmission	7.00%	0.78	1.54%	0.29	3.93%	0.74
Overall	9.00%	1.00	5.29%	1.00	5.29%	1.00

As noted in the Joint Request, Otter Tail implemented final rates on November 1, 2017. Consistent with Otter Tail's standard practice, Otter Tail customer account representatives met with LGS customers to review the new rates and assess different service options as more fully explained in the response to MN-DOC-328. Otter Tail assessed the customers' bills under each of the potential LGS rate options in preparation for those meetings. Those assessments highlighted the fact that the new LGS rates were providing inappropriate price signals that, if left unaddressed, would incorrectly incentivize customers to migrate away from TOD service and to change voltage levels.

With final rates being implemented on November 1, 2017, it was not until mid-December that Otter Tail and customers began seeing bills that showed rate increases that were higher than expected. For example, certain LGS TOD Primary customers experienced bill increases of more than 20% - more than double the overall increase for that rate sub-class.

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Information Request:

Please fully explain (approximate date) when Otter Tail's customer account representatives began meeting with LGS customers and also at what point the Company became aware of the "unintended issues" associated with the rate changes and rate design approved in the rate case.

If this information has already been provided in testimony or in response to an earlier Department-DER information request, please identify the specific cite(s) or Department-DER information request number(s).

Attachments: 0

Response:

In late October 2017, OTP Industrial Representatives began to analyze final LGS rates in preparation of proactively meeting with large customers. We had an initial meeting with one industrial customer shortly after final rates were implemented on November 1, 2017. During that meeting, the customer expressed interest to changing to transmission service due to potential bill savings. OTP only has one customer on LGS Transmission service, which, when combined with the additional customer investment necessary to take transmission service, indicated a potential issue with the rate design. OTP performed additional analysis of potential bill impacts for its largest customers in November and December 2017 and found the final rates were providing unintended signals to leave Time of Day Service and to change voltages in a way that is not consistent with marginal cost. OTP and the Chamber began collaborating on a revised rate design in January 2018.



## **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  
Comments**

**Docket No. E017/GR-15-1033**

**Dated this 24<sup>th</sup> day of May 2018**

**/s/Sharon Ferguson**

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Tom	Boyko	tboyko@eastriver.coop	East River Electric Power Coop.	211 S. Harth Ave  Madison, SD 57042	Electronic Service	No	OFF_SL_15-1033_Official Service List
Ray	Choquette	rchoquette@agp.com	Ag Processing Inc.	12700 West Dodge Road PO Box 2047 Omaha, NE 68103-2047	Electronic Service	No	OFF_SL_15-1033_Official Service List
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1800  St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_15-1033_Official Service List
Joseph	Dammel	joseph.dammel@ag.state.mn.us	Office of the Attorney General-RUD	Bremer Tower, Suite 1400 445 Minnesota Street St. Paul, MN 55101-2131	Electronic Service	Yes	OFF_SL_15-1033_Official Service List
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Charles	Drayton	charles.drayton@enbridge.com	Enbridge Energy Company, Inc.	7701 France Ave S Ste 600  Edina, MN 55435	Electronic Service	No	OFF_SL_15-1033_Official Service List
James C.	Erickson	jericksonkbc@gmail.com	Kelly Bay Consulting	17 Quechee St  Superior, WI 54880-4421	Electronic Service	No	OFF_SL_15-1033_Official Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Bruce	Gerhardson	bgerhardson@otpc.com	Otter Tail Power Company	PO Box 496 215 S Cascade St Fergus Falls, MN 565380496	Electronic Service	Yes	OFF_SL_15-1033_Official Service List
Dan	Harmelink	Dan.Harmelink@woodsfuller.com	Woods, Fuller, Shultz & Smith P.C.	300 S Phillips Ave Ste 300 PO Box 5027 Sioux Falls, SD 57117-5027	Electronic Service	No	OFF_SL_15-1033_Official Service List
Kimberly	Hellwig	kimberly.hellwig@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_15-1033_Official Service List
Annete	Henkel	mui@mutilityinvestors.org	Minnesota Utility Investors	413 Wacouta Street #230 St. Paul, MN 55101	Electronic Service	No	OFF_SL_15-1033_Official Service List
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Linda	Jensen	linda.s.jensen@ag.state.mn.us	Office of the Attorney General-DOC	1800 BRM Tower 445 Minnesota Street  St. Paul, MN 551012134	Electronic Service	Yes	OFF_SL_15-1033_Official Service List
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Bill	Lachowitz	blachowitz@ibewlocal949.org	IBEW Local Union 949	12908 Nicollet Ave S  Burnsville, MN 55337-3527	Electronic Service	No	OFF_SL_15-1033_Official Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Douglas	Larson	dlarson@dakotaelectric.com	Dakota Electric Association	4300 220th St W  Farmington, MN 55024	Electronic Service	No	OFF_SL_15-1033_Official Service List
James D.	Larson	james.larson@avantenergy.com	Avant Energy Services	220 S 6th St Ste 1300  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_15-1033_Official Service List
Eric	Lipman	eric.lipman@state.mn.us	Office of Administrative Hearings	PO Box 64620  St. Paul, MN 551640620	Electronic Service	No	OFF_SL_15-1033_Official Service List
Peter	Madsen	peter.madsen@ag.state.mn.us	Office of the Attorney General-DOC	Bremer Tower, Suite 1800 445 Minnesota Street St. Paul, Minnesota 55101	Electronic Service	Yes	OFF_SL_15-1033_Official Service List
Pam	Marshall	pam@energycents.org	Energy CENTS Coalition	823 7th St E  St. Paul, MN 55106	Electronic Service	No	OFF_SL_15-1033_Official Service List
Joseph	Meyer	joseph.meyer@ag.state.mn.us	Office of the Attorney General-RUD	Bremer Tower, Suite 1400 445 Minnesota Street St Paul, MN 55101-2131	Electronic Service	Yes	OFF_SL_15-1033_Official Service List
Tom	Micheletti	tommicheletti@excelsiorenergy.com	Excelsior Energy Inc.	225 S 6th St Ste 2560  Minneapolis, MN 55402-4638	Electronic Service	No	OFF_SL_15-1033_Official Service List
Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP	33 South Sixth St Ste 4200  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_15-1033_Official Service List
Ben	Passer	Passer@fresh-energy.org	Fresh Energy	408 St. Peter Street Ste 220  Saint Paul, MN 55102	Electronic Service	Yes	OFF_SL_15-1033_Official Service List
David G.	Prazak	dprazak@otpc.com	Otter Tail Power Company	P.O. Box 496 215 South Cascade Street Fergus Falls, MN 565380496	Electronic Service	No	OFF_SL_15-1033_Official Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Robert H.	Schulte	rhs@schulteassociates.com	Schulte Associates LLC	1742 Patriot Rd  Northfield, MN 55057	Electronic Service	No	OFF_SL_15-1033_Official Service List
Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates	7400 Lyndale Ave S Ste 190  Richfield, MN 55423	Electronic Service	Yes	OFF_SL_15-1033_Official Service List
Mrg	Simon	mrgsimon@mrenergy.com	Missouri River Energy Services	3724 W. Avera Drive P.O. Box 88920 Sioux Falls, SD 571098920	Electronic Service	No	OFF_SL_15-1033_Official Service List
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Cam	Winton	cwinton@mnchamber.com	Minnesota Chamber of Commerce	400 Robert Street North Suite 1500 St. Paul, Minnesota 55101	Electronic Service	Yes	OFF_SL_15-1033_Official Service List
Daniel P	Wolf	dan.wolf@state.mn.us	Public Utilities Commission	121 7th Place East Suite 350 St. Paul, MN 551012147	Electronic Service	Yes	OFF_SL_15-1033_Official Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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