



414 Nicollet Mall
Minneapolis, Minnesota 55401

May 15, 2015

—Via Electronic Filing—

Daniel P. Wolf
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101

RE: REPLY COMMENTS
2013-2014 –AAA AND PGA TRUE-UP – NATURAL GAS OPERATIONS
DOCKET NO. G999/AA-14-580 AND G002/AA-14-736

Dear Mr. Wolf:

Northern States Power Company, doing business as Xcel Energy, submits to the Minnesota Public Utilities Commission this reply to the May 5, 2015 Review of the 2013-2014 Annual Automatic Adjustment Reports of the Minnesota Department of Commerce, Division of Energy Resources in the above-referenced Dockets.

We have electronically filed this document with the Minnesota Public Utilities Commission, and copies have been served on the parties on the attached service lists.

Please contact me at (612) 330-7529 or paul.lehman@xcelenergy.com if you have any questions regarding this filing.

Sincerely,

/s/

PAUL J LEHMAN
MANAGER, REGULATORY COMPLIANCE AND FILINGS

Enclosures
c: Service List

STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION

Beverly Jones Heydinger	Chair
Nancy Lange	Commissioner
Dan Lipschultz	Commissioner
John Tuma	Commissioner
Betsy Wergin	Commissioner

IN THE MATTER OF THE PETITION OF
NORTHERN STATES POWER COMPANY
ANNUAL AUTOMATIC ADJUSTMENT OF
CHARGES REPORT FOR ITS NATURAL GAS
OPERATION

DOCKET NOS. G999/AA-14-580 &
G002/AA-14-736

REPLY COMMENTS

INTRODUCTION

Northern States Power Company, doing business as Xcel Energy, submits to the Minnesota Public Utilities Commission this Reply to the May 5, 2015 Review of 2013-2014 Annual Automatic Adjustment Reports by the Minnesota Department of Commerce – Division of Energy Resources in the above-referenced Dockets.

We appreciate the Department’s thorough review of our natural gas Annual Automatic Adjustment (AAA) Report, and its recommendation to accept and implement our true-up calculation. We provide our Reply to the Department’s recommendations below, which focuses on the discussion about interruptible customers’ unauthorized use of gas during curtailment periods. We urge the Commission to allow the Company time to observe and analyze the impact of our increased penalty pricing on customer behavior, and not to require utilities to forcibly convert customers to firm service. We believe penalty pricing is a superior solution to address the problem of unauthorized gas usage. In contrast, a forced conversion requirement is not practical, and would require significant expenditures of resources on evaluation, facility construction, and internal system improvements.

REPLY

A. Utility Revocation of Customer Interruptible Status through Discontinuing Service or Forced Conversion to Firm Service

The Department recommends that all utility tariffs have a provision which gives the utilities the right to revoke interruptible customer class status from habitually non-compliant interruptible customers by discontinuing service or moving the customer to firm service. The Company, too, is concerned that the failure to curtail by interruptible customers may harm system operations to the detriment of all customers. For this reason, the Company has already proposed tariff provisions in Docket No. G002/M-14-540.

Our approved tariff provisions address the failure to curtail in two ways: first, we increased the penalty rate for using unauthorized gas from \$1.00 to \$5.00 per therm,¹ and second, we clarified in our tariff that taking penalty gas is a breach of the terms of service.² The Company has also filed for Commission approval of proposed tariff changes to address how curtailment notifications are made³ and a new procedure that defines when we will temporarily disconnect a customer's service.⁴ The latter proposal includes customer notification, meter data querying, and eventual disconnection and meter locking if unauthorized use persists. The Commission will hear the Company's Petition in Docket No. G002/M-14-540 on May 21, 2015.

Concurrent to this hearing schedule, the Department has requested utility comments on the following questions related to forced customer conversion from interruptible to firm service:

- *What anticipated effects would the above recommended change to tariff language have on the utilities' demand entitlements?*
- *When should a utility remove a customer from interruptible service? Immediately? The following November 1? A different date?*
- *What notice, if any, is required from the utility to give to a customer before moving the customer to a different rate class? If none is required, how should notice be given?*

¹ Effective November 1, 2014.

² See tariff pages: Minnesota Gas Rate Book – MPUC No. 2, Section 5, Sheets 4.1, 8, 12, 19, 26, 27, 33, and 54; Section 6, Sheet 24; and Section 7, Sheets 11 and 20

³ See tariff pages: Minnesota Gas Rate Book – MPUC No. 2, Section 5, Sheets 4, 6.1, 10, 23, and 29 and Section 6, Sheets 24 and 27

⁴ See tariff page: Minnesota Gas Rate Book – MPUC No. 2, Section 6, Sheet 27

- *What are the specific triggers for a utility to remove a customer from interruptible service? Unauthorized usage over a pre-determined amount of dekatherms? A percentage of winter sales? Non-compliance with called curtailments more than once?*
- *How long would a customer be excluded from interruptible service before it could be reinstated into that rate class?*
- *What amount should be charged to be reinstated and what types of costs would be included in the charge?*

The Company believes the higher penalty has been and will continue to encourage customers to comply with the curtailment request and minimize instances of unauthorized gas use.⁵ The Company, as a general matter, believes that penalty pricing is the more appropriate course of action for addressing interruptible customers' non-compliance with curtailment requests. We believe this solution should be given the opportunity to succeed, and that its effectiveness should be measured once there is sufficient data available. At this time, the Company and customers have not experienced an adequate number of curtailment periods since introducing the \$5.00 per therm penalty pricing to assess and conclude whether or not significant behavior modification is taking place. We have observed individual customers use less unauthorized gas this heating season, but whether the driving factor for this was the increased penalty, milder weather, or other reasons cannot be determined at this time. The Company would like to experience at least two more heating seasons with curtailment requests before determining how effective the increased penalty rate is.

It is possible that the \$5.00 per therm penalty pricing is not a sufficient deterrent for customer usage during curtailments. The Company is willing to further increase the penalty rate if a higher financial deterrent is warranted. Regardless, we continue to believe that pricing is the best mechanism to address interruptible customer usage during curtailments. This mechanism does not disrupt existing customer contracts, does not frustrate Company efforts to plan for demand entitlements, requires no additional facilities construction, and does not require extensive billing system modifications. Despite our strong preference for the pricing mechanism, we continue to explore alternatives, including those suggested by the Department. We provide the following discussion in response to the Department's requests.

⁵ To illustrate the magnitude of the penalty, the per therm price (including base rates, cost of gas, and riders) for a medium interruptible customer in January 2015 was approximately \$0.54/therm. If a medium interruptible customer used unauthorized gas in January 2015, they would have paid approximately \$5.54/therm for the unauthorized gas.

1. *Effects on Demand Entitlement*

We are not opposed to the concept introduced by the Department that utilities perform an evaluation at the end of each heating season to determine whether and to what extent interruptible customers used gas during a curtailment period. When considering the feasibility of a utility requirement to force an interruptible customer onto firm service, however, the Company has significant concerns. The Company's concerns include the feasibility of a forced conversion under the capabilities of our system, the costs and cost allocations that result from a forced conversion, the upstream and downstream implications of increased firm load on our system, the disruption of customer contracts, the timing constraints in a forced conversion, and exposure to long-term interstate pipeline capacity costs and contracts.

Commission staff similarly echoes the Company's concerns and need for caution in their recently issued Staff Briefing Papers. Staff writes:

Each utility calculates its needs for interstate pipeline capacity (demand entitlements) based on its system's design day firm requirements, which include a reserve margin to offset unexpected operational fluctuations. The utility's annual projected firm requirement does not include any interruptible customers that could be converted to firm service. In order to fulfil [sic] its firm requirements after an interruptible customer is converted to firm service and the utility's reserve margin is reduced, the utility may be challenged to meet its obligations during peak-day conditions. The reserve margin may not be sufficient to serve interruptible customers that have been converted to firm service on a system design day. PUC staff believes that caution should be used in developing tariff language that converts an interruptible customer to firm service during the winter heating season.⁶

If certain large-load interruptible customers were converted to firm service, the Company anticipates that there would be immediate impacts to its demand entitlement needs. We estimate our peak day entitlement on the number of customers and average use per customer. The number of customers is a key component to this calculation. By adding a new large customer to firm service, we would generally need to buy more capacity on the upstream pipeline serving our system. If the upstream pipeline is fully subscribed, they may need to build more pipeline facilities.

⁶ Docket No. G002/M-14-540, *In the Matter of the Petition of Northern States Power Company for Modifications to the Interruptible Service Tariffs*. Minnesota Public Utilities Commission, Staff Briefing Papers at page 8. May 21, 2015.

2. *Timing of Conversion*

The Company has reviewed the Department's discussion and concludes that it would be unable to move a customer from interruptible to firm service by November 1 as a fixed date annually in all circumstances. In some cases, a forced conversion would require an extensive evaluation, followed by additional facilities investments to provide the required capacity to meet large customers' peak load demand. This evaluation includes potential investments both upstream and downstream, where we identify the need to construct intrastate or distribution pipeline to meet the additional firm load. In some instances, such evaluation and eventual facilities construction could not be achieved between the end of the heating season and the following November 1.

3. *Notice of Conversion*

The Company believes there are many practical considerations that accompany forced conversion onto firm service. Providing advance notice to the customer is one such consideration. At present, the Company has existing contractual duties to its interruptible customers, which may include different provisions for minimum notice periods. The Company has not to date undertaken a full review of all interruptible service contracts with customers to identify where terms would be affected by a forced conversion requirement and require modifications. Nor has the Company surveyed its interruptible customers to determine the implications of advance notice of a change of service associated with a forced conversion to firm service.

Beyond providing notice, there are many other considerations from the perspective of administering a forced conversion program, including the capabilities of our current billing and customer tracking systems. It is not clear to the Company that such significant effort is warranted where the total number of interruptible customers is relatively low (less than 500 of a total customer count of almost 450,000).

4. *Triggers for Removal or Conversion*

The Company does not believe that a forced conversion is warranted after non-compliance with a curtailment occurs once or twice during a season. There are other potential metrics that could be applied which may be more appropriate, including a review of the proportional usage between winter season usage and penalty gas usage and a triggering ratio. A set number of days of non-compliance could potentially also trigger a forced conversion. These metrics might be more successful at targeting

habitual offenders. Again, prior to conversion, an extensive evaluation would be required to determine the impact of bringing on that customer's firm load.

5. *Term of Forced Conversion*

When considering what time period a customer's forced conversion should last, it is imperative to include a thorough evaluation of the capabilities of our system and what a conversion to firm service would entail for a specific customer. In some instances, our system's capabilities both upstream and downstream would not allow a conversion to firm service without significant additional investment. The implications of additional investments must be considered over time, and it is not clear that the terms of conversion should be the same for each customer. Where there is need for construction upstream, this would be on other companies' facilities and we would not control the process or timing of the construction project.

For example, if constructing additional facilities such as an interstate pipeline was required to meet our obligation to provide firm service to a previously interruptible customer, we would likely be subject to a 10-year capacity contract with the interstate pipeline to pay for the construction. If the customer were only "firm" for a year, other customers would have to absorb the costs of the construction contract for years 2 through 10. We believe this forced conversion is contrary to the public interest in two ways. First, we do not believe the public interest is supported by a cost-shift from one non-compliant customer to all firm service customers. A potential solution is to require the offending customer to remain a firm retail service customer and therefore in a position to bear the 10-year contract costs for the full 10 years. Second, since interruptible customers provide benefits to the system as a whole, we do not believe a 10-year forced conversion onto firm service supports the public interest

6. *Reinstatement Costs*

We agree with the Department's suggestion that the customer subject to the conversion should be responsible for all costs of reconnection or reinstatement, and that other customers should not bear the costs related to curbing unauthorized usage by interruptible customers. We are less supportive of an additional obligation on the utility to inspect or evaluate the customer's back-up equipment, however. We believe such a requirement is beyond the scope of the interruptible service relationship.

B. Capacity Utilization Program

The Department recommends we request a variance for the five occasions where Xcel Energy continued to use the Capacity Utilization Program during 2013-2014 after the expiration of the original accounting method pilot program. We apologize for any oversight on our part because it was not clear to us that Commission approval of the accounting method is or was required. To the extent that either an extension or a variance is required, please consider this Reply our formal request for an extension to provide explicit authorization for the Company to use the accounting treatment under the Capacity Utilization Program in the five instances noted by the Company.

Minn. R. 7829.3200 provides that the Commission may grant a variance to its rules if it finds:

- Enforcement of the rule would impose an excessive burden upon the applicant or others affected by the rule,
- Granting the variance would not adversely affect the public interest, and
- Granting the variance would not conflict with standards imposed by law.

Our request meets these standards, as discussed below.

1. *Enforcement of the Rule Would Impose an Excessive Burden upon the Applicant or Others Affected by the Rule*

Our natural gas customers have already been credited for the savings generated by the transactions. To reverse the credit now would be a burden to customers.

2. *The Public Interest is Served*

An extended accounting treatment is supported by the public interest because the Capacity Utilization Program benefits both natural gas and electric customers. Net savings were returned to natural gas customers through the annual true-up calculation and subsequent year's true-up factors included in the Purchase Gas Adjustment (PGA) calculations.

3. *There is No Conflict with the Law*

We are not aware of any legal standard that precludes the Commission from approving this variance at this time.

C. Hedging

The Department recommends each utility that hedges (including physical and financial hedges) continue to provide a post-mortem analysis, in a format similar to what was provided in this docket, in subsequent AAA filings. The Company does not oppose this recommendation.

D. Contractor Main Strikes Reports

The Department recommends that the Commission require that all the utilities total the gas costs in its Contract Main Strikes Report and also provide the allocation of the gas costs credited to each class in its true up of commodity costs. The Company does not oppose this recommendation on a going forward basis.

CONCLUSION

We appreciate the Department's review of our Annual Report and True-Up, and we respectfully request the Commission decline to require utilities to forcibly convert interruptible customers to firm service for using unauthorized gas. We believe penalty pricing is a superior solution to address unauthorized gas usage. We urge the Commission to allow the Company time to observe and analyze the impact of our increased penalty pricing on customer behavior.

Dated: May 15, 2015

Northern States Power Company

CERTIFICATE OF SERVICE

I, SaGonna Thompson, hereby certify that I have this day served copies of the foregoing document on the attached list of persons.

xx by depositing a true and correct copy thereof, properly enveloped with postage paid in the United States mail at Minneapolis, Minnesota

xx electronic filing

DOCKET NOS. G999/AA-14-580
G002/AA-14-736

Dated this 15th day of May 2015

/s/

SaGonna Thompson
Regulatory Administrator

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Tamie A.	Aberle	tamie.aberle@mdu.com	Great Plains Natural Gas Co.	400 North Fourth Street Bismarck, ND 585014092	Electronic Service	No	OFF_SL_14-580_G999-AA-14-580
Julia	Anderson	Julia.Anderson@ag.state.mn.us	Office of the Attorney General-DOC	1800 BRM Tower 445 Minnesota St St. Paul, MN 551012134	Electronic Service	Yes	OFF_SL_14-580_G999-AA-14-580
Kristine	Anderson	kanderson@greatermngas.com	Greater Minnesota Gas, Inc.	202 S. Main Street Le Sueur, MN 56058	Electronic Service	No	OFF_SL_14-580_G999-AA-14-580
Marie	Doyle	marie.doyle@centerpointenergy.com	CenterPoint Energy	800 LaSalle Avenue P O Box 59038 Minneapolis, MN 554590038	Electronic Service	No	OFF_SL_14-580_G999-AA-14-580
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 500 Saint Paul, MN 551012198	Electronic Service	No	OFF_SL_14-580_G999-AA-14-580
Michael	Greiveldinger	michaelgreiveldinger@alliantenergy.com	Interstate Power and Light Company	4902 N. Biltmore Lane Madison, WI 53718	Electronic Service	No	OFF_SL_14-580_G999-AA-14-580
Nicolle	Kupser	nkupser@greatermngas.com	Greater Minnesota Gas, Inc.	202 South Main Street P.O. Box 68 Le Sueur, MN 56058	Electronic Service	No	OFF_SL_14-580_G999-AA-14-580
Amber	Lee	ASLee@minnesotaenergyresources.com	Minnesota Energy Resources Corporation	2665 145th Street West Rosemount, MN 55068	Electronic Service	No	OFF_SL_14-580_G999-AA-14-580
Paul J.	Lehman	paul.lehman@xcelenergy.com	Xcel Energy	414 Nicollet Mall Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_14-580_G999-AA-14-580
John	Lindell	agorud.ecf@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012130	Electronic Service	Yes	OFF_SL_14-580_G999-AA-14-580
Regulatory	Records	Regulatory.Records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_14-580_G999-AA-14-580

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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_14-580_G999- AA-14-580

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Tamie A.	Aberle	tamie.aberle@mdu.com	Great Plains Natural Gas Co.	400 North Fourth Street Bismarck, ND 585014092	Electronic Service	No	OFF_SL_14-736_AA-14-736
Julia	Anderson	Julia.Anderson@ag.state.mn.us	Office of the Attorney General-DOC	1800 BRM Tower 445 Minnesota St St. Paul, MN 551012134	Electronic Service	Yes	OFF_SL_14-736_AA-14-736
Kristine	Anderson	kanderson@greatermngas.com	Greater Minnesota Gas, Inc.	202 S. Main Street Le Sueur, MN 56058	Electronic Service	No	OFF_SL_14-736_AA-14-736
Christopher	Anderson	canderson@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022191	Electronic Service	No	OFF_SL_14-736_AA-14-736
Gail	Baranko	gail.baranko@xcelenergy.com	Xcel Energy	414 Nicollet Mall7th Floor Minneapolis, MN 55401	Electronic Service	No	OFF_SL_14-736_AA-14-736
William A.	Blazar	bblazar@mnychamber.com	Minnesota Chamber Of Commerce	Suite 1500 400 Robert Street North St. Paul, MN 55101	Electronic Service	No	OFF_SL_14-736_AA-14-736
Michael	Bradley	mike.bradley@lawmoss.com	Moss & Barnett	150 S. 5th Street, #1200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_14-736_AA-14-736
Robert S.	Carney, Jr.			4232 Colfax Ave. S. Minneapolis, MN 55409	Paper Service	No	OFF_SL_14-736_AA-14-736
George	Crocker	gwillc@nawo.org	North American Water Office	PO Box 174 Lake Elmo, MN 55042	Electronic Service	No	OFF_SL_14-736_AA-14-736
Jeffrey A.	Daugherty	jeffrey.daugherty@centerpointenergy.com	CenterPoint Energy	800 LaSalle Ave Minneapolis, MN 55402	Electronic Service	No	OFF_SL_14-736_AA-14-736

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Ian	Dobson	ian.dobson@ag.state.mn.us	Office of the Attorney General-RUD	Antitrust and Utilities Division 445 Minnesota Street, BRM Tower St. Paul, MN 55101	Electronic Service 1400	No	OFF_SL_14-736_AA-14-736
Marie	Doyle	marie.doyle@centerpointenergy.com	CenterPoint Energy	800 LaSalle Avenue P O Box 59038 Minneapolis, MN 554590038	Electronic Service	No	OFF_SL_14-736_AA-14-736
Rebecca	Eilers	rebecca.d.eilers@xcelenergy.com	Xcel Energy	414 Nicollet Mall, 7th Floor Minneapolis, MN 55401	Electronic Service	No	OFF_SL_14-736_AA-14-736
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 500 Saint Paul, MN 551012198	Electronic Service	No	OFF_SL_14-736_AA-14-736
Edward	Garvey	garveyed@aol.com	Residence	32 Lawton St Saint Paul, MN 55102	Electronic Service	No	OFF_SL_14-736_AA-14-736
Benjamin	Gerber	bgerber@mnchamber.com	Minnesota Chamber of Commerce	400 Robert Street North Suite 1500 St. Paul, Minnesota 55101	Electronic Service	No	OFF_SL_14-736_AA-14-736
Michael	Greiveldinger	michaelgreiveldinger@alliantenergy.com	Interstate Power and Light Company	4902 N. Biltmore Lane Madison, WI 53718	Electronic Service	No	OFF_SL_14-736_AA-14-736
Annete	Henkel	mui@mutilityinvestors.org	Minnesota Utility Investors	413 Wacouta Street #230 St. Paul, MN 55101	Electronic Service	No	OFF_SL_14-736_AA-14-736
Michael	Hoppe	il23@mtn.org	Local Union 23, I.B.E.W.	932 Payne Avenue St. Paul, MN 55130	Electronic Service	No	OFF_SL_14-736_AA-14-736
Eric	Jensen	ejensen@iwla.org	Izaak Walton League of America	Suite 202 1619 Dayton Avenue St. Paul, MN 55104	Electronic Service	No	OFF_SL_14-736_AA-14-736

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Richard	Johnson	Rick.Johnson@lawmoss.com	Moss & Barnett	150 S. 5th Street Suite 1200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_14-736_AA-14-736
Nicolle	Kupser	nkupser@greatermngas.com	Greater Minnesota Gas, Inc.	202 South Main Street P.O. Box 68 Le Sueur, MN 56058	Electronic Service	No	OFF_SL_14-736_AA-14-736
Amber	Lee	ASLee@minnesotaenergyresources.com	Minnesota Energy Resources Corporation	2665 145th Street West Rosemount, MN 55068	Electronic Service	No	OFF_SL_14-736_AA-14-736
John	Lindell	agorud.ecf@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012130	Electronic Service	Yes	OFF_SL_14-736_AA-14-736
Eric	Lipman	eric.lipman@state.mn.us	Office of Administrative Hearings	PO Box 64620 St. Paul, MN 551640620	Paper Service	Yes	OFF_SL_14-736_AA-14-736
Matthew P	Loftus	matthew.p.loftus@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 5 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_14-736_AA-14-736
Pam	Marshall	pam@energycents.org	Energy CENTS Coalition	823 7th St E St. Paul, MN 55106	Electronic Service	No	OFF_SL_14-736_AA-14-736
Mary	Martinka	mary.a.martinka@xcelenergy.com	Xcel Energy Inc	414 Nicollet Mall 7th Floor Minneapolis, MN 55401	Electronic Service	No	OFF_SL_14-736_AA-14-736
David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022093	Electronic Service	No	OFF_SL_14-736_AA-14-736
Andrew	Moratzka	apmoratzka@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_14-736_AA-14-736

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Rita	Mulkern	rita.mulkern@mdu.com	Great Plains Natural Gas	400 N 4th St Bismarck, ND 58501	Electronic Service	No	OFF_SL_14-736_AA-14-736
David W.	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency	Suite 300 200 South Sixth Street Minneapolis, MN 55402	Electronic Service	No	OFF_SL_14-736_AA-14-736
Greg	Palmer	gpalmer@greatermngas.com	Greater Minnesota Gas, Inc.	PO Box 68 202 South Main Street Le Sueur, MN 56058	Electronic Service	No	OFF_SL_14-736_AA-14-736
Regulatory	Records	Regulatory.Records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_14-736_AA-14-736
Richard	Savekoul	rsavekoul@martinsquires.com	Martin & Squires, P.A.	332 Minnesota Street Ste W2750 St. Paul, MN 55101	Electronic Service	No	OFF_SL_14-736_AA-14-736
Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates	Ste 122 9100 W Bloomington Frwy Bloomington, MN 55431	Electronic Service	No	OFF_SL_14-736_AA-14-736
James M.	Strommen	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered	470 U.S. Bank Plaza 200 South Sixth Street Minneapolis, MN 55402	Electronic Service	No	OFF_SL_14-736_AA-14-736
Lisa	Veith	lisa.veith@ci.stpaul.mn.us	City of St. Paul	400 City Hall and Courthouse 15 West Kellogg Blvd. St. Paul, MN 55102	Electronic Service	No	OFF_SL_14-736_AA-14-736
Gregory	Walters	N/A	Minnesota Energy Resources Corporation	3460 Technology Dr. NW Rochester, MN 55901	Paper Service	No	OFF_SL_14-736_AA-14-736
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_14-736_AA-14-736