



Moss & Barnett

January 7, 2021

***Via E-Filing***

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

Re: In the Matter of the Application of Frontier Communications Corporation for Approval of the Chapter 11 Plan of Reorganization of Frontier Communications Corporation and its Subsidiaries  
Docket No. P405, 407, 5316 / PA-20-504

Dear Mr. Seuffert:

Enclosed via eFiling, on behalf of Frontier Communications Corporation, Frontier Subsidiary Telco LLC, Citizens Newtel, LLC, Frontier Communications of Minnesota, Inc., Citizens Telecommunications Company of Minnesota, LLC, and Frontier Communications of America, Inc., please find an Answer of Frontier to Petition for Reconsideration of the Communications Workers of America in the above-entitled docket.

The filing contains protected data, as defined in Minn. R. 7829.0100, subp. 19a. The information marked as protected data is being supplied to the Commission by Frontier, is subject of efforts by Frontier that are reasonable under the circumstances to maintain its secrecy, and derives independent economic value, actual or potential, from not being generally known to, and not being readily ascertainable by proper means by, other persons who can obtain economic value from its disclosure or use. Accordingly, the information marked as protected data is trade secret information under Minn. Stat. §13.37(1)(b). Frontier requests that this data be treated as nonpublic and private or confidential data under the Minnesota Government Data Practices Act, Minn. Stat. Ch. 13, and as protected data under the Commission's rules.

Sincerely,

**Richard J. Johnson**  
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RJJ/keb

Attachments

cc: Parties of Record

6709943v1

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

Katie Sieben	Chair
Joseph K. Sullivan	Vice Chair
Valerie Means	Commissioner
Matthew Schuerger	Commissioner
John Tuma	Commissioner

In the Matter of the Application of

Frontier Communications Corporation, Frontier  
Subsidiary Telco LLC, Citizens Newtel, LLC,  
Frontier Communications of Minnesota, Inc.,  
Citizens Telecommunications Company of  
Minnesota, LLC, and Frontier Communications of  
America, Inc.

For Approval of Chapter 11 Plan of Reorganization  
of Frontier Communications Corporation and its  
Subsidiaries

Docket No. P405, 407, 5316 / PA-20-  
504

**ANSWER OF FRONTIER TO  
PETITION FOR  
RECONSIDERATION OF THE  
COMMUNICATIONS WORKERS  
OF AMERICA**

This Answer is submitted to the Minnesota Public Utilities Commission (the “Commission”) by the Frontier entities that are parties in this proceeding<sup>1</sup> (collectively “Frontier”) in response to the December 28, 2020 Petition for Reconsideration by the Communications Workers of America (“CWA Petition”) of the Commission’s December 7, 2020 Order Approving Transfer of Control of Minnesota Telecommunications Subsidiaries in this docket (“Restructuring Approval Order”). As explained below:

- (1) The foundation of Restructuring Approval Order is not affected by actions in other states; and
- (2) Granting the CWA Petition would be certain to cause long delays and substantial harm to Minnesota consumers, and even an unresolved petition leaves uncertainty.

As a result, the Commission should promptly deny the CWA Petition.

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<sup>1</sup> Frontier Communications Corporation, Frontier Subsidiary Telco LLC, Citizens Newtel, LLC, Frontier Communications of Minnesota, Inc., Citizens Telecommunications Company of Minnesota, LLC, and Frontier Communications of America, Inc.

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**I. SUMMARY**

As more fully explained below, the Commissioners and the Restructuring Approval Order correctly rejected arguments for other conditions on approval, finding such conditions unnecessary in the context of:

- (1) the detailed protections contained in the Commission’s Order Approving Settlement as Modified (Jan. 22, 2020) (the “Settlement Order”);<sup>2</sup> and
- (2) the Assurance of Discontinuance between the Office of the Minnesota Attorney General (“OAG”) and Frontier (the “AOD”).

The Commission recognized that the detailed protections of the Settlement Order, supplemented by the AOD, focus on Minnesota-specific concerns and eliminate any basis for concern regarding the terms under which Frontier Restructuring petitions may be resolved in other states.<sup>3</sup>

While the CWA may not agree with the Restructuring Approval Order or the Commission’s approach, the CWA Petition:

- (1) contains new no information that shows the protections in the Settlement Order or AOD will be diminished by actions in other states, or that any additional protections of Minnesota customers are needed; and
- (2) would be certain to instead cause significant delays and disadvantages to customers.

Accordingly, the CWA Petition should be promptly denied.

**II. FRONTIER REPLY TO CWA PETITION**

**1. The CWA Petition provides no basis for the Commission not to maintain its reliance on the Settlement Order and AOD.**

The Restructuring Approval Order clearly explains the Commission’s fundamental

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<sup>2</sup> *In the Matter of a Commission Inquiry into the Service Quality, Customer Service, and Billing Practices of Frontier Communications*, Docket No. P407, 405/CI-18-122, Order Approving Settlement as Modified (Jan. 22, 2020) [hereinafter “Settlement Order.”]

<sup>3</sup> Restructuring Approval Order, pp. 6-7.

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reliance on extensive Minnesota specific protections in the Settlement Order as the primary basis for rejecting other conditions in connection with its approval of the Frontier Restructuring:

Whatever the merits of such [most favored state] provisions in general, Frontier's 2020 service quality settlement has already established in detail the standards Frontier must meet, and the remedies for noncompliance. ... And it preserves the authority of the Commission, the Department, and the Office of the Attorney General to investigate service-related topics.<sup>4</sup>

The Commission's reliance on the ongoing authority of the Commission, Department, and OAG is fully supported by the Settlement Order. The Settlement Order expressly preserves the authority of the Commission and Department to conduct additional investigations relating to telephone service quality, in addition to the numerous specific provisions for direct involvement of the Department and Commission in supervision of service quality standards.<sup>5</sup> The Settlement Order provides in part:

The Modified Settlement does not include matters that are subject to the authority of the Department or Commission, but are not resolved in the January 22, 2020 Order. The Parties further agree that nothing in this Modified Settlement or the January 22, 2020 Order shall preclude the Department from conducting any investigation and providing any comments to the Commission, or preclude the Commission from taking action, in relation to any matters, raised by any individual customers or any other issues that were not analyzed in the Department Report or the subject of a Department recommendation in the report.<sup>6</sup>

The Settlement Order also contains extensive and detailed protections for Minnesota customers, as the Restructuring Approval Order notes:

Among other things, the [Settlement Order] establishes a plan for improving ten measures of service quality, and for reporting on twenty service topics. It identifies 16 measures of service quality and a process to secure monetary remedies for past service quality lapses, and also provides remedies for future service quality lapses.<sup>7</sup>

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<sup>4</sup> Restructuring Approval Order, p. 7.

<sup>5</sup> See, Modified Settlement Section IV. A Service Quality Metrics, pp. 22-24.

<sup>6</sup> Modified Settlement Section VII. K. Reserved Matters, p 28.

<sup>7</sup> Restructuring Approval Order, p. 7.

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The Commission also rejected claims for other conditions:

[T]o the extent that Frontier affirms its obligations to the Settlement Order, the Commission finds that the interests of Minnesota customers will be well protected. Accordingly, the Commission will decline to impose additional conditions on Frontier's restructuring, ...<sup>8</sup>

The Restructuring Approval Order also recognized the added protections and investment included in the AOD:

Moreover, the Office of the Attorney General has supplemented [the Settlement Order] with an additional agreement [the AOD] addressing broadband matters. Given this unique context, it is unclear what additional benefits a "most favored state" requirement could provide to Minnesota customers.<sup>9</sup>

The CWA Petition does not even acknowledge the AOD,<sup>10</sup> much less consider its effects.<sup>11</sup>

Like the Settlement Order, there is no reason to doubt that Frontier will fully perform the AOD. The AOD provides: (1) a \$10 million investment in broadband improvements (2) a stayed civil penalty of \$10 million; (3) the OAG's right to seek specific performance or a motion to enforce; and (4) the possible use of Minn. Stat. Section 8.31.<sup>12</sup>

The Commission's focus and reliance on Minnesota specific protections in the Settlement Order and AOD remain completely justified. The Settlement Order reflects an extensive investigation by the Department of Commerce of circumstances in Minnesota, with the added benefits of modifications initiated by Commission staff and included in the Settlement Order. Similarly, the AOD reflects a separate and extensive investigation by the OAG of broadband issues in Minnesota.

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<sup>8</sup> *Id.*

<sup>9</sup> *Id.*

<sup>10</sup> See, CWA Petition, pp 1-4.

<sup>11</sup> The AOD provides extensive consumer protections and a \$10 million investment by Frontier to provide or enhance internet service. The AOD also "resolves any concerns or issues the Office of Attorney General has or may have in regards to approval by the MPUC of Frontier's MPUC Restructuring Request." AOD Paragraph 54.

<sup>12</sup> *Id.* paragraphs 46, 48, and 49.

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As noted above, the Settlement Order also expressly preserves the authority of the Commission, Department and OAG to conduct additional investigations relating to telephone service quality and the mechanism to do so. That mechanism would be a separate proceeding in which the Commission can determine whether there are concerns and then conduct a review to address a resolution of those concerns, including consideration of all information available at that time. Given the Commission's ability to investigate and address issues as part of the ongoing service quality compliance associated with the Settlement Order or in another proceeding, there is no reason to impede Frontier's emergence from Chapter 11, which would be the inevitable and very damaging consequence of granting reconsideration.

No other state's actions, including a focus on investments rather than service standards in some other states, could be as carefully matched to circumstances in Minnesota, as the Restructuring Approval Order recognizes. The Restructuring Approval Order also appropriately recognizes that the Settlement Order alone provides ample protections for Minnesota customers.

That single factor justifies denial of the CWA Petition, but there are other reasons to deny the CWA Petition as well.

**2. The CWA Petition is based solely on speculation that investments in other states will impair service in Minnesota.**

The CWA Petition focuses almost exclusively on investment commitments in other states<sup>13</sup> and claims that the Commission should require more commitments to investment and Fiber to the Premises ("FTTP").<sup>14</sup> But the CWA Petition: (1) is based on superficial and speculative assumptions that Frontier will lack sufficient resources make investments in other larger Frontier states and provide quality service in Minnesota; and (2) incorrectly assumes that only FTTP will

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<sup>13</sup> CWA Petition, pp. 2-4.

<sup>14</sup> CWA Petition p 4.

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provide quality telephone service and enhanced broadband services. Accordingly, the CWA Petition provides no justification to reverse the rationale of the Restructuring Approval Order.

The CWA Petition rests on the unsupported premise that investment requirements in other states will make it impossible for Frontier to make appropriate investments in Minnesota. The CWA Petition provides no support for that premise, which is refuted by facts.

A core benefit of the Frontier Restructuring is the elimination of over \$10 billion of funded debt and \$1 billion of annual interest obligations,<sup>15</sup> which will increase Frontier's overall financial resources and ability to provide quality services. Even before Restructuring, Frontier invested approximately of \$1.2 billion per year (\$1.23 billion in 2019, \$1.19 billion in 2018, and \$1.15 billion in 2017).<sup>16</sup> Frontier has also committed to continuing to complete its existing CAF II buildouts across its 25 state territory, including Minnesota, by the end of calendar year 2021, consistent with the FCC's requirements. These investment levels combined with the more than \$10 billion decrease in funded debt and \$1 billion decrease in annual interest obligations refute the CWA Petition's speculation that Frontier's investment obligations in California, Connecticut, and West Virginia may impede service quality in Minnesota.

Even more importantly, there is also no reason to believe that any of the protections of the Settlement Order will be impaired by investments or actions in other states. As the Restructuring Approval Order notes, the Settlement Order has "established in detail the standards Frontier must meet and the remedies for non-compliance" and "preserves the authority of the Commission, the Department, and the [OAG] to investigate service-related topics."<sup>17</sup> In other words, if Frontier were to fail to invest in Minnesota (which it will not) and the quality of its service deteriorated,

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<sup>15</sup> Restructuring Approval Order, p. 4.

<sup>16</sup> Frontier Communications Form 10-K, (March 31, 2020), F-8 Consolidated Statements of Cash Flows for Years Ended December 31, 2019, 2018, and 2017.

<sup>17</sup> Restructuring Approval Order, p. 7.

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the Settlement Order provides the Commission with substantial authority to investigate and address these issues. Similarly, there is no reason to believe that the AOD (backed by extensive enforcement mechanisms) will be impaired by investments in other states. Again, as noted above, as part of the AOD, Frontier has made a significant minimum investment commitment of \$10 million to enhance broadband services in Minnesota. As a result, there is no basis to doubt the foundation of the Restructuring Approval Order, or to make any modifications to it.

Further, there is no basis to conclude that actions in other states will adversely impact Frontier employees in Minnesota, which is fundamentally the CWA's concern. Under the Plan of Reorganization approved by the Bankruptcy Court in August, 2020, all employee wages, compensation, benefit programs, and collective bargaining agreements, including without limitation those under any expired collective bargaining agreements, in place as of the effective date the Company emerges from Chapter 11 will be assumed by reorganized Frontier and remain in place.<sup>18</sup> In other words, the CWA members and other Frontier employees will not be impaired as a result of the restructuring and will have the ability to continue to focus on service in Minnesota. In addition, the ongoing investigative authority of the Commission, the Department, and the OAG under the Settlement Order provides additional assurance of telephone service quality.

**3. The CWA Petition incorrectly claims that Frontier will make no additional investments in Minnesota.**

The CWA Petition claims that: "It is now readily apparent that Frontier has no plans to increase the level of investment in Minnesota and certainly not its investment in fiber to the premises."<sup>19</sup> The CWA Petition's speculation and mistaken conclusion are refuted by facts.

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<sup>18</sup> *In re Frontier Communications Corporation, et al.*, Case No. 20-22476 (RDD) (S.D.N.Y.) (08/27/20), Fifth Amended Joint Plan of Reorganization of Frontier Communications Corporation and its Debtor Affiliates Pursuant To Chapter 11 Of The Bankruptcy Code at p. 56, para. 84.

<sup>19</sup> CWA Petition, p. 3.



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The CWA Petition fails to reflect the fact that Frontier is currently implementing a significant FTTP project in Minnesota [NON-PUBLIC DATA BEGINS [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] 20

**NON-PUBLIC DATA ENDS]**

The CWA Petition also rests on a mischaracterization of the December 15, 2020 Frontier Quarterly Investor Update (“Investor Update”). The CWA Petition cites investment plans for Frontier’s eight largest states and two other states (of the 25 states Frontier operates in) and again incorrectly speculates that Minnesota or the other states may not be candidates for additional fiber investment.<sup>21</sup> To the contrary, the same discussion in the Investor Update cited by the CWA Petition states:

Frontier constantly evaluates the composition of the state groupings. IN and PA are two additional states among many currently being evaluated.<sup>22</sup>

More importantly as it relates to Minnesota, as explained above, Frontier has targeted and is currently deploying FTTP in Minnesota today.

The CWA petition also rests on comparisons of Frontier’s operations in Minnesota to Frontier’s operations California, Connecticut, and West Virginia. Such comparisons are misleading because of: (1) the major differences between Frontier’s operations in those states and Minnesota; and (2) the fact that the Settlement Order (and AOD) reflect the resolution of extensive

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<sup>20</sup> Frontier has also previously deployed FTTP [NON-PUBLIC DATA BEGINS [REDACTED] NON-PUBLIC DATA ENDS]

<sup>21</sup> CWA Petition, p. 3. (Emphasis added.)

<sup>22</sup> Frontier Communications Corp., Quarterly Investor Update, Dec. 15, 2020, available at: [https://sl.q4cdn.com/144417568/files/doc\\_financials/2020/q3/FTR-Q3-2020-Investor-Update-Final.pdf](https://sl.q4cdn.com/144417568/files/doc_financials/2020/q3/FTR-Q3-2020-Investor-Update-Final.pdf) Quarterly Update. p 23. (Emphasis added.)

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service quality investigations in Minnesota that occurred before the Frontier Restructuring, while the terms in California and West Virginia reflect service quality concerns were resolved in those states as part of the Frontier Restructuring.

Frontier now operates the former Regional Bell Operating Companies in Connecticut and West Virginia and serves over 90% of the areas of both states. In California, which is by far the largest state in the country by population and the third largest state by geographic area, Frontier is the second largest incumbent local exchange carrier, only behind AT&T. Frontier's California service area encompasses more than 3.7 million households and spans the entire length and width of the state and includes very urban markets in the Los Angeles area. As a result, Frontier's operations in Connecticut, West Virginia and California are substantially different and more extensive than in Minnesota.

The CWA Petition also ignores both: (1) the fact that the Settlement Order and OAD resolved service quality concerns before the Frontier Restructuring, while service quality concerns were are being resolved as part of the Frontier Restructuring in California and West Virginia; and (2) fundamental differences between Minnesota and those states. As a result, there is no basis to rely on the speculation that is the foundation of the CWA Petition.

**4. The CWA Petition ignores the extreme difficulty and long delay that would result from trying to apply other states' terms to fit Minnesota, the Settlement Order, and AOD.**

Trying to apply terms from other states in the context of the Settlement Order and the OAD in a reasonable way would be extremely difficult and would be likely to impose delays on Frontier's emergence from Chapter 11, a consequence that the Commission recognized must be avoided.

If the Commission did accept the CWA Petition and seek to add new conditions to the Restructuring Approval, the Commission would need to schedule proceedings to determine: (a)

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how terms from any other state compare to the Settlement Order and AOD; (b) whether the terms from those states are based on state-specific facts and regulatory requirements that are applicable or appropriate for Minnesota; and (c) whether those terms either should or could legally be required in Minnesota.

These proceedings would, at a minimum, require Comments, Reply Comments, a hearing before the Commission, followed by an order of the Commission. Requests for Reconsideration would also be likely. Resolving these questions would be likely to take a minimum of 3 or more months. Delay in Frontier's emergence from Chapter 11 (at least for Frontier's Minnesota entities) would become very likely to the significant disadvantage to Minnesota customers and potentially impact the applicable Frontier entities' ability to fulfill their obligations under the Settlement Order, the AOD and the initiated and ongoing project to deploy FTTP in Minnesota.

These disadvantages are completely unnecessary in light of the retained authority of the Commission, the Department, and the OAG to investigate any future service issues under the Settlement Agreement. The Restructuring Approval Order correctly rejected these consequences and the Commission should similarly reject the CWA Petition.

**5. Frontier requests the Commission promptly deny the CWA Petition to eliminate uncertainty.**

The Commission has correctly recognized that delay and uncertainty are to be avoided.<sup>23</sup> It is also clear that the CWA Petition will cause substantial delays and resulting harm to Minnesota customers, which are especially unnecessary in light of the retained authority of the Commission, Department and OAG to investigate any future service issues. Further, an unresolved petition for reconsideration pending leads to uncertainty which could itself impact or delay Frontier's

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<sup>23</sup> Minn. Pub. Utils. Comm'n Agenda Meeting (Sept. 24, 2020, 1:37:55), *available at*, [www.minnesotapuc.granicus.com/MediaPlayer.php?view\\_id=2&clip\\_id=1285](http://www.minnesotapuc.granicus.com/MediaPlayer.php?view_id=2&clip_id=1285). *Id.* at 2:52 - 2:54.

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emergence from Chapter 11. Accordingly, Frontier requests that the Commission take the needed steps to promptly deny the CWA Petition by written order.

**III. CONCLUSION.**

As explained above, the CWA Petition provides no legal, factual or other basis for the Commission to reconsider its Restructuring Approval Order or reverse the its fundamental reliance on the Settlement Order and AOD in the Restructuring Approval Order. Further, granting, or even extended consideration of, the CWA Petition would cause uncertainty, delay, and potential harm to Minnesota customers. As a result, Frontier requests that the Commission promptly reject the CWA Petition.

Dated: January 7, 2021

**Respectfully submitted**

\_\_\_\_\_/s/  
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## CERTIFICATE OF SERVICE

In the Matter of the Application of

MPUC Docket No.: P405, 407, 5316 / PA-20-504

Frontier Communications Corporation, Frontier  
Subsidiary Telco LLC, Citizens Newtel, LLC,  
Frontier Communications of Minnesota, Inc.,  
Citizens Telecommunications Company of  
Minnesota, LLC, and Frontier Communications of  
America, Inc.

For Approval of Chapter 11 Plan of Reorganization  
of Frontier Communications Corporation and its  
Subsidiaries

Karen E. Berg certifies that on the 7th day of January, 2021, she filed a true and correct copy of an **Answer of Frontier to Petition for Reconsideration of the Communications Workers of America** made by Communications Corporation, Frontier Subsidiary Telco LLC, Citizens Newtel, LLC, Frontier Communications of Minnesota, Inc., Citizens Telecommunications Company of Minnesota, LLC, and Frontier Communications of America, Inc., by positing it on [www.edockets.state.mn.us](http://www.edockets.state.mn.us). Said document was also served via U.S. Mail and e-mail as designated on the Official Service List on file with the Minnesota Public Utilities Commission and attached hereto.

/s/ Karen E. Berg

Karen E. Berg

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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	Yes	OFF_SL_20-504_PA-20-504
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