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September 28, 2022

Mr. Will Seuffert  
Executive Secretary  
Minnesota Public Utilities Commission  
121 7<sup>th</sup> Place East  
Suite 350  
St. Paul, MN 55101-2147

**RE: In the Matter of Establishing Generic Standards for Utility Tariffs for  
Interconnection and Operation of Distributed Generation Facilities  
Under Minn. Stat. § 216B.1611  
Docket Nos. E999/CI-16-521  
E999/CI-01-1023  
Initial Comments**

Dear Mr. Seuffert:

Otter Tail Power Company (Otter Tail) hereby submits to the Minnesota Public Utilities Commission (Commission) its Initial Comments in the above-referenced matter.

We have electronically filed this document with the Commission and copies have been served on all parties on the attached service list. A Certificate of Service is also enclosed.

Please contact me at 218-739-8595 or [dprazak@otpc.com](mailto:dprazak@otpc.com) if you have any questions regarding this filing.

Sincerely,

*/s/ DAVID G. PRAZAK*  
David G. Prazak  
Supervisor Pricing  
Regulatory Administration

kaw  
Enclosures  
By electronic filing  
c: Service List

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

**In the Matter of Establishing  
Generic Standards for Utility  
Tariffs for Interconnection and  
Operation of Distributed  
Generation Facilities Under  
Minn. Stat. § 216B.1611**

**Docket Nos. E999/CI-16-521  
E999/CI-01-1023**

**INITIAL COMMENTS**

**I. INTRODUCTION**

On August 29, 2022, the Minnesota Public Utilities Commission (Commission or MPUC) issued Notice of Supplemental Comment Period (Notice) in the above referenced dockets. The Notice stated the following issue:

*Should the Commission revise or replace Attachment 6 of the September 28, 2004 Order in Docket No. E999/CI-01-1023 which creates guidelines for establishing the terms of the financial relationship between an electric utility and a distributed generation customer with no more than 10 MW of capacity?*

Otter Tail's response in these initial comments will consider the issue by reviewing its recent comments, calculation procedures, and recent and known changes expected in the industry.

**II. OTTER TAIL SUMMARY RESPONSE**

Otter Tail has reviewed its filed comments in this matter<sup>1</sup>, calculation procedures, and recent and known changes in the industry, at this time we do not believe there are material changes to be made to the Attachment 6 of the September 28, 2004 Order in Docket No. E999/CI-01-1023 (DG Rates Order). However, Otter Tail recognizes changes occurring in MISO relating to its seasonal construct which may have an impact on the seasonality of incentives but may still work within the framework of the DG Rates Order. Otter Tail will continue to study the FERC-Approved MISO seasonal construct changes, and comments put forth by other parties in this docket.

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<sup>1</sup> Docket Nos. E999/CI-16-521 and E999/CI-01-1023 Compliance Filing by Otter Tail Power Company, filed June 17, 2019

### **III. OTTER TAIL RESPONSES**

Otter Tail has reviewed its June 17, 2019 Compliance Filing in this matter and continues to support what was filed as it follows current practices. This includes its support of how it calculates its avoided costs in its four retail small power production/distributed generation rate schedules, denoted on our website as Section 12 – Purchase Power Riders.<sup>2</sup> Moreover, Otter Tail continues to believe its distributed generation rates are developed in a consistent manner, are transparent to the greatest extent possible, are properly aligned with integrated resource plans, and allow for technology, location and time-specific avoided-cost considerations. To date, we are not aware of any challenges to our process that has ordered Otter Tail to do otherwise.

On November 30, 2021, MISO filed with FERC its proposed changes to its seasonal construct – which among other things - moves from an annual capacity auction to seasonal auctions. FERC approved MISO’s proposal on August 31, 2022, which is set to be implemented in June 2023. Otter Tail is considering the MISO’s seasonal construct changes in this and in other dockets. Otter Tail is studying the potential impacts and to date, has not made any final conclusions.

### **IV. CONCLUSION**

Otter Tail reiterates its commitment to continue to work diligently with our customers as well as the Commission and other stakeholders toward addressing concerns related to this docket.

Dated: September 28, 2022

Respectfully submitted,

**OTTER TAIL POWER COMPANY**

By: /s/ DAVID G. PRAZAK  
David G. Prazak  
Supervisor Pricing  
Regulatory Administration  
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<sup>2</sup> <https://www.otpc.com/pricing/minnesota/rates-rules-and-regulations-mn/>

## CERTIFICATE OF SERVICE

**RE: In the Matter of Establishing Generic Standards for Utility Tariffs  
for Interconnection and Operation of Distributed Generation  
Facilities Under Minn. Stat. § 216B.1611  
Docket Nos. E999/CI-16-521  
E999/CI-01-1023**

I, Kim Ward, hereby certify that I have this day served a copy of the following, or a summary thereof, on Will Seuffert and Sharon Ferguson by e-filing, and to all other persons on the attached service list by electronic service or by First Class Mail.

**Otter Tail Power Company  
Initial Comments**

Dated this **28<sup>th</sup>** day of **September, 2022**.

/s/ Kim Ward  
Kim Ward  
Lead Regulatory Filing Coordinator  
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Joe	Hoffman	ja.hoffman@smmpa.org	SMMPA	500 First Ave SW Rochester, MN 55902-3303	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Ronald	Horman	rhorman@redwoodelectric.com	Redwood Electric Cooperative	60 Pine Street Clements, MN 56224	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Jan	Hubbard	jan.hubbard@comcast.net		7730 Mississippi Lane Brooklyn Park, MN 55444	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Dean	Hunter	Dean.Hunter@state.mn.us	Minnesota Department of Labor & Industry	443 Lafayette Rd N St. Paul, MN 55155-4341	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Ralph	Jacobson	ralphj@ips-solar.com		2126 Roblyn Avenue Saint Paul, Minnesota 55104	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Casey	Jacobson	cjacobson@bepc.com	Basin Electric Power Cooperative	1717 East Interstate Avenue Bismarck, ND 58501	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
John S.	Jaffray	jjaffray@jrpowers.com	JJR Power	350 Highway 7 Suite 236 Excelsior, MN 55331	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Robert	Jagusch	rjagusch@mmua.org	MMUA	3025 Harbor Lane N Minneapolis, MN 55447	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Chris	Jarosch	chris@carrcreekelectricser vice.com	Carr Creek Electric Service, LLC	209 Sommers Street North Hudson, WI 54016	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Brian	Jeremiason	bjeremiason@llec.coop	Lyon-Lincoln Electric Cooperative, Inc.	205 W. Hwy. 14 Tyler, MN 56178	Electronic Service	No	OFF_SL_16-521_Official Service List PUC



First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Sarah	Johnson Phillips	sarah.phillips@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Nate	Jones	njones@hcpd.com	Heartland Consumers Power	PO Box 248  Madison, SD 57042	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Kevin	Joyce	kjoyce@tesla.com		N/A	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Cliff	Kaehler	cliff.kaehler@novelenergy. biz	Novel Energy Solutions LLC	4710 Blaylock Way  Inver Grove Heights, MN 55076	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
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Michael	Kampmeyer	mkampmeyer@a-e- group.com	AEG Group, LLC	260 Salem Church Road  Sunfish Lake, Minnesota 55118	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Jack	Kegel	jkegel@mmua.org	MMUA	3025 Harbor Lane N Suite 400  Plymouth, MN 55447-5142	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Tom	Key	tkey@epri.com	EPRI	942 Corridor Park Blvd  Knoxville, TN 37932	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Brad	Klein	bklein@elpc.org	Environmental Law & Policy Center	35 E. Wacker Drive, Suite 1600 Suite 1600 Chicago, IL 60601	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Jack	Kluempke	Jack.Kluempke@state.mn. us	Department of Commerce	85 7th Place East Suite 600 St. Paul, MN 55101	Electronic Service	No	OFF_SL_16-521_Official Service List PUC

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Chris	Kopel	chrisk@CMPASgroup.org	Central Minnesota Municipal Power Agency	459 S Grove St  Blue Earth, MN 56013-2629	Paper Service	No	OFF_SL_16-521_Official Service List PUC
Steve	Kosbab	skosbab@meeker.coop	Meeker Cooperative Light and Power	1725 US Hwy 12 E  Litchfield, MN 55355	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Michael	Krause	michaelkrause61@yahoo.com	Kandiyo Consulting, LLC	433 S 7th Street Suite 2025 Minneapolis, Minnesota 55415	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Michael	Krikava	mkrikava@taftlaw.com	Taft Stettinius & Hollister LLP	2200 IDS Center 80 S 8th St Minneapolis, MN 55402	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Corrina	Kumpe	ckumpe@mysunshare.com		N/A	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Jeffrey L.	Landsman	jlandsman@wheelerlaw.com	Wheeler, Van Sickle & Anderson, S.C.	44 E. Mifflin Street, 10th Floor  Madison, WI 53703	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Mark	Larson	mlarson@meeker.coop	Meeker Coop Light & Power Assn	1725 Highway 12 E Ste 100  Litchfield, MN 55355	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Burnell	Lauer	blauer.sundial@gmail.com	Sundial Solar	3209 W. 76th St #305  Edina, MN 55435	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Dean	Leischow	dean@sunrisenrg.com	Sunrise Energy Ventures	315 Manitoba Ave Ste 200  Wayzata, MN 55391	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Nick	Lenssen	lenssen.nick@gmail.com		1195 Albion Way  Boulder, CO 80305	Electronic Service	No	OFF_SL_16-521_Official Service List PUC

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Amy	Liberkowski	amy.a.liberkowski@xcelenergy.com	Xcel Energy	414 Nicollet Mall 7th Floor Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Carl	Linville	clinville@raponline.org	Regulatory Assistance Project	50 State Street Suite #3  Montpelier, VT 05602	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Phillip	Lipetsky	greenenergyproductsllc@gmail.com	Green Energy Products	PO Box 108  Springfield, MN 56087	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Michael	Loeffler	mike.loeffler@nngco.com	Northern Natural Gas Co.	CORP HQ, 714 1111 So. 103rd Street Omaha, NE 681241000	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Jody	Londo	jody.l.londo@xcelenergy.com	Xcel Energy	414 Nicollet Mall 7th Floor Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
William	Lovelace	wlovelace@minnkota.com	Minnkota Power Cooperative	5301 32nd Ave S  Grand Forks, ND 58201	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Brian	Lydic	brian@irecusa.org	Interstate Renewable Energy Council, Inc.	PO Box 1156  Latham, NY 12110-1156	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Natalie	McIntire	natalie.mcintire@gmail.com	Wind on the Wires	570 Asbury St Ste 201 Saint Paul, MN 55104-1850	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Dave	McNary	David.McNary@hennepin.us	Hennepin County DES	701 Fourth Ave S Ste 700 Minneapolis, MN 55415-1842	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
John	McWilliams	John.McWilliams@DairylandPower.com	Dairyland Power Cooperative	3200 East Ave SPO Box 817 La Crosse, WI 54601-7227	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
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Thomas	Melone	Thomas.Melone@AllcoUS.com	Minnesota Go Solar LLC	222 South 9th Street Suite 1600 Minneapolis, Minnesota 55120	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Tim	Mergen	tmergen@meeke.coop	Meeke Cooperative Light And Power	1725 US Hwy 12 E. Suite 100 PO Box 68 Litchfield, MN 55355	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Sergio	Navas	snavas@sundialsolarenergy.com	Sundial Energy, LLC	3363 Republic Ave Saint Louis Park, MN 55426	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Ben	Nelson	benn@cmpasgroup.org	CMMPA	459 South Grove Street Blue Earth, MN 56013	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency	220 South Sixth Street Suite 1300 Minneapolis, Minnesota 55402	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Russell	Olson	rolson@hcpd.com	Heartland Consumers Power District	PO Box 248  Madison, SD 570420248	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Wendi	Olson	wolson@otpc.com	Otter Tail Power Company	215 South Cascade  Fergus Falls, MN 56537	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Bethany	Owen	bowen@mnpower.com	Minnesota Power	30 West Superior Street  Duluth, MN 55802	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Cezar	Panait	Cezar.Panait@state.mn.us	Public Utilities Commission	121 7th Place East Suite 350 St. Paul, MN 55101	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Dan	Patry	dpatry@sunedison.com	SunEdison	600 Clipper Drive  Belmont, CA 94002	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Jeffrey C	Paulson	jeff.jcplaw@comcast.net	Paulson Law Office, Ltd.	4445 W 77th Street Suite 224 Edina, MN 55435	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Dean	Pawlowski	dpawlowski@otpc.com	Otter Tail Power Company	PO Box 496 215 S. Cascade St. Fergus Falls, MN 565370496	Electronic Service	No	OFF_SL_16-521_Official Service List PUC

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Jeff M	Peters	jeff.peters@mrenergy.com	Missouri River Energy Services	3724 W Avera Dr PO Box 88920 Sioux Falls, MN 57109-8920	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
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Donna	Pickard	dpickardgsss@gmail.com	Genie Solar Support Services	1215 Lilac Lane  Excelsior, MN 55331	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Crystal	Pomerleau	crystal.r.pomerleau@xcel energy.com	Xcel	N/A	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
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_16-521_Official Service List PUC
Elizabeth	Psihos	elizabeth.psihos@idealener gies.com		N/A	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Patrick	Quinn	pquinn@GREnergy.com		N/A	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Mark	Rathbun	mrathbun@greenergy.com	Great River Energy	12300 Elm Creek Blvd  Maple Grove, MN 55369	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Michael	Reinertson	michael.reinertson@avante nergy.com	Avant Energy	220 S. Sixth St. Ste 1300  Minneapolis, Minnesota 55402	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
John C.	Reinhardt	N/A	Laura A. Reinhardt	3552 26th Ave S  Minneapolis, MN 55406	Paper Service	No	OFF_SL_16-521_Official Service List PUC
Generic Notice	Residential Utilities Division	residential.utilities@ag.stat e.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_16-521_Official Service List PUC

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Robert K.	Sahr	bsahr@eastriver.coop	East River Electric Power Cooperative	P.O. Box 227  Madison, SD 57042	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Richard	Savelkoul	rsavelkoul@martinsquires.com	Martin & Squires, P.A.	332 Minnesota Street Ste W2750  St. Paul, MN 55101	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Kenric	Scheevel	Kenric.scheevel@dairylandpower.com	Dairyland Power Cooperative	3200 East Ave S PO Box 817 La Crosse, Wisconsin 54602	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
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Kay	Schraeder	kschraeder@minnkota.com	Minnkota Power	5301 32nd Ave S  Grand Forks, ND 58201	Electronic Service	No	OFF_SL_16-521_Official Service List PUC



First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Rob	Scott Hovland	rob.scott-hovland@mrenergy.com	Missouri River Energy Services	3724 W Avera Dr PO Box 88920 Sioux Falls, SD 571098920	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Dean	Sedgwick	Sedgwick@Itascapower.com	Itasca Power Company	PO Box 455  Spring Lake, MN 56680	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th Pl E Ste 350  Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_16-521_Official Service List PUC
Doug	Shoemaker	dougs@charter.net	Minnesota Renewable Energy	2928 5th Ave S  Minneapolis, MN 55408	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Felicia	Skaggs	fskaggs@meekeer.coop	Meekeer Cooperative Light & Power	1725 US Highway 12 E Suite 100 Litchfield, MN 55355	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Trevor	Smith	trevor.smith@avantenergy.com	Avant Energy, Inc.	220 South Sixth Street Suite 1300 Minneapolis, Minnesota 55402	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Rafi	Sohail	rafi.sohail@centerpointenergy.com	CenterPoint Energy	800 LaSalle Avenue P.O. Box 59038 Minneapolis, MN 554590038	Electronic Service	No	OFF_SL_16-521_Official Service List PUC

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Robyn	Sonstegard	robyn.s@northstarelectric.coop	North Star Electric Cooperative, Inc.	PO BOX 719  Baudette, MN 56623	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
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Sherry	Swanson	sswanson@noblesce.com	Nobles Cooperative Electric	22636 US Highway 59 PO Box 788 Worthington, MN 56187	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
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Pat	Treseler	pat.jcplaw@comcast.net	Paulson Law Office LTD	4445 W 77th Street Suite 224 Edina, MN 55435	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Jeff	Triplett	triplettj@powersystem.org	MREA	10710 Town Square Dr NW St 201  Minneapolis, MN 55449	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Adam	Tromblay	atromblay@noblesce.com	Nobles Cooperative Electric	22636 US Hwy. 59 P.O. Box 788 Worthington, MN 56187-0788	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
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Craig	Turner	cturner@dakotaelectric.com	Dakota Electric Association	4300 - 220th Street West  Farmington, MN 550249583	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Roger	Warehime	roger.warehime@owatonnautilities.com	Owatonna Municipal Public Utilities	208 S Walnut Ave PO BOX 800 Owatonna, MN 55060	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
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Danielle	Winner	danielle.winner@state.mn.us	Department of Commerce	85 7th Place East Suite 500 Saint Paul, MN 55101	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Robyn	Woeste	robynwoeste@alliantenergy.com	Interstate Power and Light Company	200 First St SE  Cedar Rapids, IA 52401	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Terry	Wolf	terry.wolf@mrenergy.com	Missouri River Energy Services	3724 W Avera Dr PO Box Sioux Falls, SD 571098920	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Brian	Zavesky	brianz@mrenergy.com	Missouri River Energy Services	3724 West Avera Drive P.O. Box 88920 Sioux Falls, SD 57108-8920	Electronic Service	No	OFF_SL_16-521_Official Service List PUC