

215 South Cascade Street
PO Box 496
Fergus Falls, Minnesota 56538-0496
218 739-8200
www.otpc.com (web site)

January 6, 2014



Dr. Burl Haar
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101-2147

**Re: In the Matter of the Petition of Otter Tail Power Company for Approval of a
Transmission Cost Recovery Rider Annual Adjustment
Docket No. E017/M-13-103
ADDITIONAL REPLY COMMENTS TO THE ADDITIONAL RESPONSE
COMMENTS OF THE MINNESOTA DEPARTMENT OF COMMERCE**

Dear Dr. Haar:

Enclosed for filing in the above-referenced matter are Otter Tail Power Company's ("Otter Tail's") Additional Reply Comments to the Additional Response Comments of the Department of Commerce, Division of Energy Resources ("DOC") filed December 16, 2013.

Otter Tail has electronically filed this document with the Commission which, in compliance with Minn. Rule 7829.1300, subp. 2, also constitutes service on the DOC and the Office of Attorney General-Residential Utilities Division. A Certificate of Service is also enclosed.

If you have any questions regarding this filing, please contact me at 218-739-8279 or at stommerdahl@otpc.com.

Sincerely,

/s/ STUART TOMMERDAHL
Stuart Tommerdahl
Manager, Regulatory Administration

wao
Enclosures
By electronic filing
c: Service List

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

**In the Matter of the Petition of
Otter Tail Power Company for Approval
of a Transmission Cost Recovery Rider
Annual Adjustment**

Docket No. E017/M-13-103

**OTTER TAIL POWER COMPANY'S
ADDITIONAL REPLY COMMENTS TO
THE ADDITIONAL RESPONSE
COMMENTS OF THE MINNESOTA
DEPARTMENT OF COMMERCE**

Otter Tail Power Company ("OTP") is filing this additional reply to the Minnesota Department of Commerce, Division of Energy Resource's ("DOC's" or "Department's") December 16, 2013 Additional Response Comments. OTP's Petition in this matter was filed on February 7, 2013. There have been several rounds of Comments and Replies since then.

These Additional Reply Comments address the DOC's Additional Response Comments on the issue of whether it would be appropriate to create a mismatch between the rate base used to determine revenue requirements and the rate base used to derive the revenue credits for facilities included in OTP's Transmission Cost Recovery Rider ("TCRR"). These Additional Reply Comments specifically address the DOC's proposed application of the TCRR Statute (Minn. Stat. §216B.16, subd. 7b). These Additional Reply Comments also provide a summary of OTP's position on each of the issues requiring Commission determination in this proceeding.

- 1. The TCRR Statute (Minn. Stat. §216B.16, subd. 7b), does not require an inappropriate mismatching of the rate base used for the revenue requirements and the rate base used for the revenue credits of facilities included in the TCRR.**

OTP's June 27, 2013 Reply Comments explain how OTP's investment in these projects results in lower rates for OTP's customers. OTP's September 25, 2013 Reply Comments explain why the DOC's recommendation to artificially mismatch the rate bases used for the revenue requirement and revenue credits in the Rider would be inappropriate and create a significant harm to OTP and discourage significantly OTP from making these very beneficial investments.

In their December 16, 2013 Additional Response Comments the DOC argues that language in the TCRR Statute, requires the mismatch that it proposes.

The primary argument made by the DOC is that the Schedule 26 Revenues (“revenues”, or “MISO revenues”) must be fully included in the TCRR calculations to be used as an offset to Schedule 26 Expenses (“MISO charges”) being allocated to OTP from other utilities’ transmission investments. The DOC highlights the following language from the TCRR Statute in support of its position:

“These charges [the MISO charges allocated to OTP relating to other utilities’ transmission investments] must be reduced or offset by revenues received by the utility and by amounts the utility charges to other regional transmission owners . . .”¹

The DOC stresses that this language “does not permit OTP to include only some of the revenues received from the MISO in the TCRR,” but the DOC’s interpretation of the emphasized language ignores the other language in the statute that clearly anticipates a matching of the revenue requirements and the revenue credits for OTP’s investments included in the TCRR. In fact, the above-cited statutory provision includes the clause highlighted below:

“These charges must be reduced or offset by revenues received by the utility and by amounts the utility charges to other regional transmission owners, *to the extent those revenues and charges have not been otherwise offset.*”²

If some amount of rate base is not included as recommended by the DOC, both revenues and revenue requirements should be proportionally reduced to be consistent with the statute. By removing the revenue requirements from the Rider for the removed rate base, the corresponding revenues have been “otherwise offset” as the statute contemplates. If the revenues were left in, but the revenue requirements were reduced (by reducing the rate base for just this side of the calculation), then the revenues would be applied to reduce MISO charges, even though they have already been offset by a reduced rate base for the revenue requirement calculation. In simple terms, customers would be receiving revenues for facilities they are not paying for. This may at first sound like a great deal. But the necessary corollary is that OTP would not have any revenues to pay for the facilities (all the revenues would have been diverted to credits in the TCRR). By its plain language, the TCRR Statute does not require this kind of inappropriate mismatching of the rate base used for the revenue requirements and the rate base used for the

¹ Minn. Stat. §216B.16, subd. 7b (2).

² Id. (Emphasis Added).

revenue credit. Also, such an interpretation of the statute would completely subvert its purpose, which is to incentivize OTP's investments in such facilities (and as described in OTP's previous Replies, this is good public policy for several reasons: it better ensures that these important facilities get constructed, it lowers the costs of such facilities to OTP's customers (see table 1), and it encourages the utilities serving in this region to be owners in these facilities (as opposed to unattached outside investment entities that are not under Commission's jurisdiction)). The DOC's mistaken interpretation of the TCRR Statute would discourage rather than encourage OTP to make these investments and therefore these important public policy objectives would not be achieved.

There are several additional references in the TCRR Statute that reflect that the legislated purpose of the statute was to encourage utilities like OTP to make these investments and, specifically, that the rate base used for the revenue requirement should match the rate base used for revenue credits for the TCRR rate calculations. For example, the statute expressly provides that a TCRR should allow "the utility to recover on a timely basis the costs net of associated revenues of facilities. . ." (Minn. Stat. §216B.16, subd. 7b(a), emphasis added). The "costs net of associated revenues" language explicitly requires matching of the costs and revenues. Without such a matching, the result would not be a "net" amount. Consider how the term "net" is defined in several contexts. For example, Black's Law Dictionary (6th Ed.) defines "net" as follows:

"Net. That which remains after all allowable deductions, such as charges, expenses, discounts, commissions, taxes, etc. are made."

It would not be a "net" amount if we calculated "that which remains after only some charges expenses, discounts, commissions, taxes, etc. are made." Consider also the Black's Law Dictionary definition of "net cost:"

"Net Cost. The actual cost of an item. Net cost is derived at by deducting any income or financial gain from the total cost. . ." (emphasis added).

We would not arrive at the net cost of an investment by deducting only some costs but including all income. A netting of the costs and revenues for these facilities is what OTP has requested. As explained in detail in OTP's previous Reply Comments, if ratepayers are paying for all of the costs of the investment, they should be credited with all of the revenues derived from the

investment; if they are paying for some portion of the investment, then they should be credited with a corresponding portion of the revenues derived from the investment.

As these definitions illustrate, matching is a critical element in any effort to arrive at a “net” value. The TCRR Statute makes it clear that it would not be appropriate to include all the revenues that are derived from these facility investments but only some of the costs associated with those revenues. Therefore, while it remains OTP’s request to include all costs and all revenues (as exemplified in Table 1), if the Commission deems it appropriate to limit the costs included in the rate base of the TCRR revenue requirement, to arrive at an appropriate “costs net of associated revenues” calculation, the proportion of the credits applied must be matched to the proportion of the costs that have been included.

2. The TCRR Statute (Minn. Stat. §216B.16, subd. 7b), does not require a matching of MISO revenue credits to MISO charges.

The DOC Additional Response Comments also argue that the goal of the TCRR Statute is to match MISO revenues credits with MISO charges (instead of matching MISO revenue credits from a project with the project’s revenue requirements). This is a very significant mistake in the DOC’s interpretation. As illustrated above and discussed further below, that is not what the statute requires.

There would be no rational basis for attempting to match MISO revenues allocated to OTP with the MISO charges allocated to OTP: while they sound like they might be parallels, they are not. MISO’s allocation of revenues to OTP is determined by the size of OTP’s investment in transmission facilities; MISO charges are determined by the relative size of OTP’s load in the MISO footprint and in its load zone (with particulars depending upon the MISO classification of facilities as RECB, MVP, etc.). There is no relationship between the size of OTP’s MISO investment in facilities (from which the revenues are derived) and the size of OTP’s load (from which OTP’s allocation of charges is derived).

Table 1, below, which is repeated from OTP’s earlier Reply Comments, can help to illustrate this point. It compares the results of what OTP is proposing for inclusion in the TCRR (including all revenue requirements, all MISO revenue and all MISO charges relating to the Bemidji-Grand Rapids line) to what OTP would include in the TCRR if OTP had not made an investment in that project. As previously pointed out in OTP’s Reply Comments, the result is

that with OTP investing at the level that it did, OTP customers will pay about one-third less than they would have paid if OTP had not invested in the project.

Through this comparison, the lack of relationship between MISO revenues and MISO charges can also be seen: with \$0 investment, MISO charges remain the exactly the same (line 1-Schedule 26 Expense); MISO revenues are reduced to \$0 (line 3-Schedule 26 Revenue) and the revenue requirement is also reduced to \$0 (line 2). The ultimate result is higher rates for OTP customers, and, importantly for this illustration, the lack of any relationship between the level of MISO revenues and the level of MISO charges can be seen.

Table 1
(Repeated from OTP’s Reply Comments)

	Bemidji–Grand Rapids Project Revenue Requirements 2013	
	With OTP Investment	No OTP Investment
Schedule 26 Expense ³	1,228,463	1,228,463
MN Revenue Requirements ⁴	1,447,707	0
Schedule 26 Revenue ⁵	(1,879,798)	0
Total	796,372	1,228,463

To further develop this illustration, one could also consider other scenarios at varying investment levels. Consider for example a scenario right in the middle: If OTP had invested half as much as it did the MISO charges would again remain exactly the same (line 1-Schedule 26 Expense), the MN Revenue Requirements would be reduced by half (line 2), and the Revenue would also be reduced by half (line 3-Schedule 26 Revenue). Under this middle scenario, customers would pay less than they would have if OTP had not invested at all, but the reduction to rates would only be half of what they are with the larger investment actually made by OTP. By comparing these scenarios the relationship between revenues, revenue requirement and MISO

³ Minnesota’s share of MISO’s allocation of costs to OTP for B-GR based on OTP’s retail load requirements.

⁴ The Minnesota revenue requirement for B-GR is based on OTP’s total investment in the project.

⁵ Minnesota’s share of MISO’s allocation of revenues to OTP for B-GR is based upon OTP’s total investment in the project.

charges can be better understood. Because the revenues (line 3) are more than the revenue requirement (line 2), if OTP invests more, its customer rates go down; if OTP invests less, its customers rates go up. These examples show that there is no relationship between the amount of OTP's investment and the charges MISO allocates to OTP. The amount of MISO charges stays the same no matter whether OTP invests nothing, half of what it did or all of what it did.

In summary, while OTP's position in this matter is that the full amount of the rate base should be used to derive both the revenue requirement and revenue credit for the TCRR, these illustrations show that if the rate base for the revenue requirement is reduced, then the revenue credits should be similarly reduced or an arbitrary mismatch between the rate bases used to derive each occurs. The DOC's position is that despite there being no relationship between the MISO revenues and the MISO charges, if a reduction were to be made to the revenue requirements, the Commission should ignore the arbitrary mismatch between the rate base used for the TCRR revenues requirement and the rate base for the associated revenues credits, and instead keep the full revenue credits to "match" them with the MISO charges. As illustrated above, while it may at first *sound* like there should be a parallel between MISO charges and MISO revenues, there is no such parallel, and therefore there is no rational basis for attempting to match those elements in the rate calculations--it is certainly not a justification for creating an arbitrary mismatch between the rate base used for the revenue requirement and the rate base used for the revenue credits relating to OTP's investment reflected in the TCRR.

Table 1 also demonstrates that there are also important policy considerations here. The DOC's approach would penalize OTP for doing what was advantageous for its customers. As reflected in Table 1, if OTP had made no investment in the Bemidji-Grand Rapids line, its customers would have paid much more, but OTP would not have any disallowed costs. Also as OTP explained in its Reply Comments, the DOC's recommendation would result in OTP recovering less than 25 percent of the costs that an independent transmission company would recover if it made the same investment. The consequences of the DOC's approach would be to encourage OTP and other Minnesota utilities to forgo these investments or to let independent transmission entities make them instead. This would be the opposite result of that intended by the TCRR Statute. It was enacted with the intent of incentivizing Minnesota utilities like OTP to make investments in these transmission facilities. For the reasons explained herein, such a result

is not consistent with the language and purpose of TCRR Statute and it would not be in the public interest.

3. Summary of OTP's position on the issues requiring Commission resolution.

As identified in OTP's September 25, 2013 Reply Comments, there are three major issues that require Commission resolution in this proceeding. Under each of these major issues, several sub-issues have also developed in the course of this proceeding. The remainder of these Additional Reply Comments summarizes OTP's position on each of those issues and sub-issues. References to detailed explanations made in OTP's prior Reply Comment filings are included where appropriate.

Issue 1: Whether OTP's share of costs incurred to construct the Bemidji-Grand Rapids project, but not specifically quantified in planning estimates in the project's September 8, 2007 Application for a Certificate of Need ("2007 B-GR CON Application"), should be excluded from the rate base used to derive the TCRR rates.

(See detailed discussion and citations in OTP's June 27, 2013 Reply Comments, at pages 7-12).

Sub-issue 1A: Whether it is reasonable to treat the costs quantified in the 2007 B-GR CON as the total aggregate of all expected project costs and to characterize amounts over those estimates a "cost overrun" for the project.

Summary of OTP's Position: The 2007 B-GR CON Application explicitly described that the amounts quantified in the Application were not an estimate of the total project costs. It also described that the costs of the alternative projects being analyzed in the CON were quantified on the same basis. The amounts quantified in the 2007 B-GR CON Application were consistent with standards being used for CON applications at that time, and the approach was determined reasonable by the DOC. (See, in particular the discussion of the DOC's review of the costs used in the CON in OTP's June 27, 2013 Reply Comments at page 9).

OTP also notes that the DOC's December 16, 2013 Additional Response Comments refer to the costs incurred over the amounts explicitly quantified in the 2007 B-GR CON as "cost overruns." This is not a reasonable characterization of those amounts, as it suggests that such costs were not expected to be incurred at the time the CON Application was filed. But the CON Application explicitly describes those additional costs that are expected to be incurred (even though they are not quantified). Therefore,

the incurrence of these costs is not a “cost overrun” as the DOC calls them in their December 16, 2013 Additional Response Comments. Their mischaracterization as “cost overruns” is not a reasonable basis for disallowance.⁶

Sub-issue 1B: Whether a determination by the Commission to use CON amounts as a cap on TCRR recoveries should apply to the 2007 B-GR CON, given that it was filed prior to that determination and consistent with the standards that were in place at that time.

Summary of OTP’s Position: If the Commission makes a determination that OTP’s ability to recover transmission investment costs in a TCRR will be limited to only the amounts explicitly quantified in original CON Applications, that is a standard that had not been articulated at the time OTP filed the 2007 B-GR CON Application, and therefore Commission should not apply such a standard to cost recovery for the B-GR facility. Such a standard should be applicable on a going forward basis to CON Applications filed after the determination. In this case, OTP should be allowed to recover its cost of the B-GR line given that the approach OTP used in the 2007 B-GR CON Application was consistent with the standards used for CONs at the time. Changing the standards now and applying them to the recovery of costs for this facility would not provide OTP any opportunity to comply with the new standards.

Issue 2: Whether capitalized internal labor costs incurred by OTP to construct the TCRR-eligible transmission projects should be excluded from the rate base used to derive TCRR rates.

(See detailed discussion and citations in OTP’s June 27, 2013 Reply Comments, at pages 13-17).

Summary of OTP’s Position: Capitalized Internal Costs should not be excluded from the rate base in the TCRR. OTP demonstrated in its last general rate case that internal costs attributable to long term construction projects were not being recovered in base rates. The Administrative Law Judge in that proceeding made specific findings on the subject and the Commission’s Order in that proceeding explained why such costs should not be excluded from recovery, citing both ratemaking and policy reasons for the ruling:

“The Commission likewise agrees with the Administrative Law Judge that there is no principled basis for disallowing recovery of internal costs not reflected in rates and that

⁶ OTP also notes that in this circumstance, there is really no question that all the amounts incurred for the B-GR line were incurred prudently—Xcel Energy was authorized to recover without disallowance its share of B-GR costs in its last general rate case. Therefore, a determination to disallow OTP’s recovery of B-GR costs would be based solely on procedural grounds not on substantive grounds.

it is not in the public interest to discourage Otter Tail from making the best use of its internal resources and expertise.”

OTP notes that in other utilities’ TCRR proceedings the Commission staff has posed in briefing papers a hypothetical scenario to illustrate a concern that a utility could “sandbag” between rate cases by moving expensed labor to capital projects, thereby reducing expensed labor to something lower than what was included in base rates. This hypothetical was not previously addressed in OTP’s prior Comment filings. But OTP can show that this isn’t occurring for OTP. While there is variation from year to year, OTP’s expensed labor costs have grown since its last rate case. OTP’s expensed labor costs as reported on its FERC Form 1 (pages 354 and 355) since 2009 (Total Company) are as follows:

Year	O & M Labor Expense
2009	\$61,014,050
2010	\$65,536,491
2011	\$64,319,231
2012	\$67,950,864

This growth in expensed labor shows that the concern illustrated by the Commission’s Staff’s hypothetical does not justify disallowance of capitalized internal costs from the rate base used in the TCRR rate calculations. As the Commission recognized in the above-cited Order, “...*it is not in the public interest to discourage Otter Tail from making the best use of its internal resources and expertise.”*

Issue 3: If the answer to issue 1 and/or 2 is yes, whether it would be appropriate to require that all of the revenues from OTP’s investment in these transmission facilities should be included in the TCRR rate calculations, even the revenues that are attributable to the capital costs disallowed (per issue 1 and/or 2).

(See detailed discussion and citations in OTP’s June 27, 2013 Reply Comments, at pages 4-7; September 25, 2013 Reply Comments, at pages 2-6; and these Reply Comments, at pages 1-7, above).

Summary of OTP’s Position: Several aspects of this issue that have been discussed in this proceeding are summarized in the bullet points listed below:

- The Department’s recommendation to exclude some costs but to include all revenues (even those derived from the excluded costs) would create an internal

contradiction in the calculation of the TCRR rate. Creating such an internal contradiction in the calculations for the TCRR rates would be arbitrary, and made only to create a false arbitrage between the revenue requirements and the revenue credits.

- If ratepayers are paying for all of the investments they should be credited with all of the revenues derived from the investments; if they are paying for some portion of the investments, they should be credited with a corresponding portion of the revenues derived from the investments.
- Including all costs in the rate base for the revenue requirements and the rate base for the revenue credits (as OTP has proposed) results in lower TCRR rates than if OTP had not made investments in these projects (See Table 1, above).
- The TCRR Statute does not require a mismatching of the rate base used for the revenue requirement and the rate base used for the revenue credits, as the DOC claims (see discussion above).
- The DOC's proposal would not satisfy the purpose of the TCRR Statute, which is for "the utility to recover on a timely basis the costs net of associated revenues of facilities." (Minn. Stat. §216B.16, subd. 7b(a), emphasis added.)
- OTP would be substantially harmed by the approach recommended by the DOC; it would recover less than 25 percent of what an outside entity, such as an independent transmission company, would recover for these investments.
- Mismatching the rate base for the revenue requirements and the rate base for the revenue credits (as the DOC has proposed) would not be consistent with the Commission's ruling in OTP's last annual TCRR Update, in which it ruled: "*All Minnesota-jurisdictional costs of the two lines [Bemidji-Grand Rapids and Fargo-Monticello] will be included in the Rider and all revenues attributable to the Minnesota-jurisdictional portions of the lines will be credited to ratepayers.*" (See discussion and citation in OTP's June 27, 2013 Reply Comments at page 6.)
- In addition to being a fundamentally inappropriate ratemaking approach, inconsistent with the TCRR Statute and the Commission's prior Order, creating a mismatch as recommended by the DOC would discourage OTP and other Minnesota utilities from making these investments. Therefore, they might not be built, they might be delayed, or they might be constructed by other entities at a much higher cost to OTP's retail customers (See Table 1). These outcomes are

the opposite of what was intended by the TCRR Statute and they would not serve the public interest.

CONCLUSION

For these reasons, OTP requests that its TCRR rate be calculated reflecting all costs incurred for its TCRR eligible transmission projects and all revenues derived from those project investments. Alternatively, if the Commission determines that certain costs should be excluded from the TCRR rate base, then the revenues that are derived from that disallowed investment should similarly be excluded.

Dated: January 6, 2014

Respectfully Submitted,

OTTER TAIL POWER COMPANY

By: /s/ STUART TOMMERDAHL
Stuart Tommerdahl
Manager, Regulatory Administration
Otter Tail Power Company
215 S. Cascade Street
Fergus Falls, MN 56537
(218) 739-8279
stommerdahl@otpc.com

OTTER TAIL POWER COMPANY

By: /s/ BRUCE GERHARDSON
Bruce Gerhardson
Associate General Counsel
Otter Tail Power Company
215 S. Cascade Street
Fergus Falls, MN 56537
(218) 739-8475
bgerhardson@otpc.com

CERTIFICATE OF SERVICE

**Re: In the Matter of the Petition of Otter Tail Power Company for Approval of a
Transmission Cost Recovery Rider Annual Adjustment
Docket No. E017/M-13-103**

I, Wendi A. Olson, hereby certify that I have this day served a copy of the following on Dr. Burl W. Haar and Sharon Ferguson by e-filing, and to all other persons on the attached official service list by electronic service or by first class mail.

**Otter Tail Power Company
Additional Reply Comments to the Additional Response Comments of the
Minnesota Department of Commerce**

Dated this **6th** day of **January 2014**.

/s/ WENDI A. OLSON _____

Wendi A. Olson
Regulatory Filing Coordinator
Otter Tail Power Company
215 South Cascade Street
Fergus Falls MN 56537
(218) 739-8699

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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_13-103_13-103
Christopher	Anderson	canderson@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022191	Electronic Service	No	OFF_SL_13-103_13-103
Michael	Bradley	bradley@moss-barnett.com	Moss & Barnett	4800 Wells Fargo Ctr 90 S 7th St Minneapolis, MN 55402-4129	Electronic Service	No	OFF_SL_13-103_13-103
Gary	Chesnut	gchesnut@agp.com	AG Processing Inc. a cooperative	12700 West Dodge Road PO Box 2047 Omaha, NE 681032047	Electronic Service	No	OFF_SL_13-103_13-103
James C.	Erickson	jericksonkbc@gmail.com	Kelly Bay Consulting	17 Quechee St Superior, WI 54880-4421	Electronic Service	No	OFF_SL_13-103_13-103
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_13-103_13-103
Bruce	Gerhardson	bgerhardson@otpc.com	Otter Tail Power Company	PO Box 496 215 S Cascade St Fergus Falls, MN 565380496	Electronic Service	No	OFF_SL_13-103_13-103
Burl W.	Haar	burl.haar@state.mn.us	Public Utilities Commission	Suite 350 121 7th Place East St. Paul, MN 551012147	Electronic Service	Yes	OFF_SL_13-103_13-103
Shane	Henriksen	shane.henriksen@enbridge.com	Enbridge Energy Company, Inc.	1409 Hammond Ave FL 2 Superior, WI 54880	Electronic Service	No	OFF_SL_13-103_13-103
James D.	Larson	james.larson@avantenergy.com	Avant Energy Services	220 S 6th St Ste 1300 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_13-103_13-103
Douglas	Larson	dlarson@dakotaelectric.com	Dakota Electric Association	4300 220th St W Farmington, MN 55024	Electronic Service	No	OFF_SL_13-103_13-103

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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_13-103_13-103
Kavita	Maini	kmairi@wi.rr.com	KM Energy Consulting LLC	961 N Lost Woods Rd Oconomowoc, WI 53066	Electronic Service	No	OFF_SL_13-103_13-103
Andrew	Moratzka	apmoratzka@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_13-103_13-103
Larry L.	Schedin	Larry@LLSResources.com	LLS Resources, LLC	12 S 6th St Ste 1137 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_13-103_13-103
Stuart	Tommerdahl	stommerdahl@otpc.com	Otter Tail Power Company	215 S Cascade St PO Box 496 Fergus Falls, MN 56537	Electronic Service	No	OFF_SL_13-103_13-103