MINNESOTA DEPARTMENT OF
COMMERCE

85 7TH PLACE EAST, SUITE 500
SAINT PAUL, MINNESOTA 55101-2198
MN.GOV/COMMERCE
651.539.1500 FAX: 651.539.1547
AN EQUAL OPPORTUNITY EMPLOYER

June 1, 2016

Daniel P. Wolf
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, Minnesota 55101-2147

RE: **Comments of the Minnesota Department of Commerce, Division of Energy Resources**
Docket No. G007,G011/GR-10-977

Dear Mr. Wolf:

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

> Minnesota Energy Resource Corporation's (MERC, Company) Decoupling Evaluation Report for Calendar Year 2015 regarding the Company's Revenue Decoupling Program.

The decoupling evaluation report was filed on May 1, 2016 by:

> Amber S. Lee
> Regulatory and Legislative Affairs Manager
> Minnesota Energy Resources Corporation
> 1995 Rahncliff Court, Suite 200
> Eagan, MN 55122

Based on its review of MERC's evaluation report, the Department recommends that the Minnesota Public Utilities Commission (Commission) **approve the Company's annual decoupling adjustment**.

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

Sincerely,

/s/ CHRISTOPHER T. DAVIS
Rates Analyst

CTD/lt
Attachment

MINNESOTA DEPARTMENT OF COMMERCE

BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

COMMENTS OF THE MINNESOTA DEPARTMENT OF COMMERCE DIVISION OF ENERGY RESOURCES

DOCKET NO. G007,G011/GR-10-977

I. BACKGROUND

On July 13, 2012, the Minnesota Public Utilities Commission (the Commission) issued its *Findings of Fact, Conclusions and Order (2012 Rate Case Order)* in Minnesota Energy Resource Corporation's (MERC) 2010 General Rate Case.

As part of this *Rate Case Order*, the Commission authorized MERC to conduct a full decoupling program on a pilot basis for three years (aka Revenue Decoupling Mechanism or RDM) under Minnesota Statute § 216B.2412, subd.1. Full decoupling means that MERC's actual sales are not adjusted to reflect sales under normal weather (or any other factor); instead, the level of sales for any given year is compared to the level of sales approved in the most recent rate case.

Page 14 of the *2012 Rate Case Order* stated:

> The Commission recognizes that MERC may already have plans in effect to achieve a higher level of energy savings in its upcoming triennial CIP filing. However, to ensure that the implementation of decoupling does not hamper MERC's continued progress toward attaining the 1.5% savings goal, the Commission will condition approval of the revenue decoupling program on MERC making a demonstration of annual incremental progress towards achieving a 1.5% rate of annual energy savings.
>
> Accordingly, the Commission will require the Company to file annual reports to the Commission that specify the RDM adjustment to be applied to each rate class for the billing period and demonstrate annual progress toward achieving the 1.5% energy efficiency goal set forth in Minn. Stat.§ 216B.241.

In addition, Page 15 of the *2012 Rate Case Order* stated:

> Approval of MERC's decoupling proposal will provide valuable data on whether an alternative form of rate decoupling – full decoupling – achieves continued and/or additional energy savings for the utility. No pilot program can guarantee a particular result in advance. The decoupling statute, however, does not require such a guarantee as a precondition for approving a pilot program.

Finally, paragraph 11 of the *2012 Rate Case Order* stated the following, with the portion relevant to this report in bold:

> 11. MERC's request for a full revenue decoupling pilot program in the form recommended by the Administrative Law Judge is approved with the following modifications or conditions.
>
> **A. MERC shall file annual reports to the Commission that specify the Revenue Decoupling Mechanism (RDM) adjustment to be applied to each rate class for the billing period and demonstrate annual progress toward achieving the 1.5% energy efficiency goal set forth in Minn. Stat. § 216B.241.**
>
> B. MERC shall state in its RDM tariff that the Commission has the authority to modify or suspend the rates in this pilot program if warranted by unexpected circumstances.
>
> C. MERC shall use the same billing determinants (customer counts, etc.) used to set final rates to determine the RDM baseline.
>
> D. The appropriate sales forecast for setting final rates and for decoupling purposes (*i.e.*, in the RDM) is MERC's initial sales forecast, corrected only as needed to resolve any errors discovered in the Vertex billing audit in favor of ratepayers. If no such errors are found, then MERC's initial sales forecast shall be used.
>
> E. The decoupling pilot program may take effect with the implementation of new rates in this proceeding.
>
> F. The decoupling program may remain in effect for no more than three years (*i.e.*, thirty-six months), unless it is extended by Commission action.

G. In its thirty-day rate case compliance filing, MERC shall submit a proposal for implementing its RDM mechanism mid-year, including prorated RDM baseline calculations for the part of the year MERC expects the RDM to be in place at the beginning of the program and at the end of the program.

H. In its thirty-day rate case compliance filing, MERC shall submit revised revenue decoupling tariff language that incorporates all the Commission's decisions in this rate case.

I. MERC shall explain its revenue decoupling program in its notice to customers about final rates at the end of this case and in another notice when the first annual revenue decoupling rate adjustment is implemented on customer bills.

On May 1, 2015, MERC submitted its *Compliance Filing Revenue Decoupling Evaluation Report for 2014* (*2014 Decoupling Evaluation* or *Report*).[1]

On July 1, 2015 the Minnesota Department of Commerce, Division of Energy Resources (Department) submitted comments on MERC's 2014 Decoupling Evaluation Report. The Department's recommendations included recommendations that:

- the Commission allow MERC to continue to assess its decoupling adjustment and approve the Company's annual decoupling adjustment;
- MERC be required to file a decoupling evaluation for 2015 next year (in 2016, the filing on which these comments are based), and extend the decoupling pilot until such time as the Commission makes a determination as to its permanence.
- MERC propose to extend revenue decoupling to all of its customer classes in its next rate case or explain why including these customers is not in the public interest.

On August 11, 2015, the Commission issued an Order on MERC's 2014 Report. The Commission's Order:

- Accepted MERC's revenue decoupling evaluation report for 2014.
- Accepted MERC's revenue decoupling adjustment calculations and approved their implementation effective April 1, 2015.
- Instructed MERC to file its 2015 evaluation report no later than May 1, 2016. Extended MERC's decoupling pilot until such time as the Commission makes a determination as to its permanence.

[1]MERC submitted its previous *Compliance Filing Revenue Decoupling Evaluation Report for 2013* (*2013 Decoupling Evaluation*) on March 27, 2014.

- Instructed MERC to include pre-filed direct testimony in its next rate case[2] on revenue decoupling that discusses extending revenue decoupling to all of its customer classes that explains why MERC believes including these customers in the RDM is or is not in the public interest.

On May 1, 2016, MERC submitted its *Compliance Filing Revenue Decoupling Evaluation Report for 2015* (*2015 Decoupling Evaluation* or *Report)*. Below, the Department evaluates MERC's *2015 Decoupling Evaluation* in light of the Commission's *Rate Case Order.*

II. DEPARTMENT ANALYSIS

A. MERC'S PROGRESS TOWARDS ATTAINING 1.5 PERCENT ENERGY SAVINGS GOAL

Similar to its *2014 Decoupling Evaluation*, MERC provided both qualitative and quantitative information showing changes in the results of MERC's Conservation Improvement Program (CIP) in its *2015 Decoupling Evaluation*. Some of these are briefly highlighted below.

1. Addition of new projects, or new measures in an existing project

MERC did not add any new CIP projects or measures in 2015.

2. Changes in CIP spending

MERC provided two tables to illustrate changes in its CIP expenditures. Table B1(A) in MERC's filing includes all previous CIP expenditures. Table B1 (B) excludes expenditures for the Company's residential behavior project (Home Energy Reports), which the Company discontinued after 2012. A review of Table B1 (A) indicates that the Company's total CIP expenditures increased 21 percent[3] between 2014 and 2015 but that total CIP expenditures decreased by 3 percent when comparing 2013-2015 CIP expenditures to 2010-2012 CIP expenditures.[4]

The Department does not believe that a change in MERC's CIP spending is particularly important because:

- Only the Residential and Small Commercial and Industrial (Small C&I) customer classes are decoupled and thus only changes to energy savings and expenditures for those customer classes are relevant;
- Changes in CIP expenditures are not a good measure of whether decoupling is removing a disincentive to utility encouragement of its customers' energy conservation improvements. Since utilities have

---

[2] MERC's relevant rate case is Docket No. G011/GR-15-736.
[3] $8,870,639/$7,360,832
[4] A review of MERC Table B1(B) indicates that total CIP expenditures increased when comparing total 2013-2015 CIP expenditures to 2010-2012 CIP expenditures if the 2010-2012 residential behavior project (Home Energy Report) is excluded.

trackers to recover the costs of CIP expenditures, CIP expenditures by themselves do not have the potential impact of reducing MERC's profits.

Instead, the Department prefers examining changes in CIP energy savings.

3. *Changes in CIP energy savings*

MERC's report shows two ways of measuring changes in energy savings for this Report. In Table B1(C) the Company includes the 2010-2012 energy savings from its Home Energy Reports behavioral change project and in Table B1(D) the Company excludes the 2010-2012 energy savings from its Home Energy Reports. The Department does not believe it is reasonable to exclude a project that was offered during the years used as a baseline for comparison. However, it is reasonable to modify the energy savings associated with the Home Energy Reports project to reflect the changes in how the Department measures these energy savings. Table 1 below summarizes the information presented by MERC in Tables B1(C) and B1(D) of its *2015 Report* with this adjustment.

Table 1: Comparison of Energy Savings, with 2010-2012 Energy Savings to Reflect Three-Year Life of Residential Behavioral Savings Project[5]

Customer Type	Average 2010-2012	2013	2014	2015	Average 2013-2015	2015 as % of 2014*	2013-2015 as % of 2010-2012
Low-Income	8,492	11,207	8,139	8,114	9,153	100%	108%
Residential	189,703	208,071	180,137	209,604	199,271	116%	105%
C/I	235,975	205,542	180,792	275,664	220,666	152%	94%
Total	434,170	424,821	369,068	493,382	429,090	134%	99%

*Percentages are rounded.

As can be seen in Table 1, MERC's 2015 total energy savings were 34 percent higher than MERC's 2014 energy savings. However, MERC's average 2013-2015 energy savings were marginally lower than the Company's average 2010-2012 energy savings. Thus, overall, MERC did not demonstrate an increase in total CIP energy savings for the period of 2013-2015 compared to 2010-2012.

However, since MERC's approved RDM focuses only on the Residential and Small C&I classes, what is important in the context of evaluating MERC's revenue decoupling mechanism is changes in Residential and Small C&I energy savings. A review of Table 1 indicates that, using the Department's method for measuring MERC's 2010-2012 energy savings, MERC's Residential Customers' energy savings increased 16 percent between

[5] Table 1 includes reductions to MERC's historical residential projects to recognize that the energy savings from behavioral projects are now assumed to have a three-year life, instead of one year, and that a project that would have been assumed to save 300 MCF when the behavioral projects were first approved is now assumed to save 100 MCF. The Department is currently working with interested parties to re-examine the issue of how to count savings from behavioral projects.

2014 and 2015 and MERC's 2013-2015 residential energy savings were 5 percent higher than for the period preceding MERC's decoupling, 2010-2012.

MERC did not report Small C&I energy savings separately in its 2015 Report. For reply comments, the Department requests that MERC indicate whether the Company could provide this information for its 2016 Report.

B. MERC'S REVENUE DECOUPLING SCENARIO ANALYSIS

The Commission has approved revenue decoupling mechanism pilots for three Minnesota utilities—MERC, Xcel Electric, and CenterPoint Energy. The benefit of having the three different utilities experiment with revenue decoupling is that it will allow parties to evaluate whether RDMs should continue, and if so:

- The type of revenue decoupling (*e.g.*, full decoupling vs. partial decoupling),
- The size of caps on the RDM decoupling mechanisms,
- Whether the caps should apply only to surcharges (an asymmetrical cap like those approved for Xcel Electric and CenterPoint Energy) or a cap on both surcharges and refunds (a symmetrical cap like the one approved for MERC currently); and
- What customer classes will have an RDM.

The Department intends to analyze MERC's experience at the end of its present pilot, which was extended in 2015 through 2018, to present an analysis of these issues for the Commission's consideration.

C. REVENUE DEFERRAL ADJUSTMENT FOR EACH RATE CLASS

Table 2 below shows MERC's estimated monthly, annual, and cumulative revenue deferred by customer rate class in 2015.

Table 2: Monthly, Annual, and Cumulative Revenue Deferred Based on Revenues per Customer[6]

	Residential			GS Small C/I	
	Monthly	Cumulative		Monthly	Cumulative
Jan	($110,781)	($110,781)		$38,659	$38,659
Feb	$43,134	($67,647)		$74,665	$113,324
Mar	($44,052)	($111,699)		$53,102	$166,426
Apr	$28,780	($82,919)		-	$166,426
May	($1,054,884)	($1,137,803)		($48,379)	$118,047
Jun	($663,575)	($1,801,378)		($28,554)	$89,493
Jul	($602,838)	($2,404,216)		($6,895)	$82,598
Aug	($135,096)	($2,539,312)		$3,345	$85,943
Sep	($335,788)	($2,875,100)		($11,674)	$74,269
Oct	($408,135)	($3,283,235)		($38,561)	$35,708
Nov	-	($3,283,235)		($57,282)	($21,574)
Dec	-	($3,283,235)		($37,822)	($59,396)
Total 2015		($3,283,235)			($59,396)

Table 2 indicates that, under MERC's approach of calculating revenues per customer, residential customers would be surcharged approximately $3.3 million in 2016 for under-recoveries in 2015. MERC's GS-Small C/I customers would be surcharged approximately $59,000. MERC began to apply these surcharges on March 1, 2016. Note that, by MERC's calculations, by October the Residential customer class encountered the cap of 10 percent of distribution revenues, which explains why there were no further recorded refunds or surcharges for Residential customers in November and December.

As further discussed below, the Department concludes that the Commission should approve the annual decoupling adjustments for the Residential and Small Commercial Classes

D. CALCULATION OF DEFERRALS

For a gas utility, distribution costs are recovered through the customers' variable rate. During years in which sales are lower than forecasted, the utility does not fully recover its distribution costs; during years in which sales are higher than forecasted, the utility over collects the amount of revenues needed. The purpose behind a revenue decoupling mechanism is to allow the Company to recover forecasted distribution costs, regardless of sales.

Table 3 below summarizes how MERC calculated its 2015 RDM deferrals.

---

[6] Positive numbers indicate a deferred refund; negative numbers indicate a deferred surcharge.

In MERC's rate case, the Commission essentially approved a forecasted (aka authorized) amount of distribution revenues per average monthly customer (Line 1 in Table 3 below). At the end of the 12-month deferral period, the forecasted revenues per average monthly customer are compared to the actual revenue per average monthly customer (Line 2) to determine the under or (over) collection of revenues per customer (Line 3).

If the forecasted average monthly number of customers (Line 4) is higher than the 2015 actual average monthly customers (Line 5) then the under or over collection per customer (Line 3) is multiplied by the forecasted average monthly number of customers (Line 4) to calculate the surcharge or (refund) per customer class (Line 6).

Table 3: Summary of MERC's Deferral Calculations for 2015

			Residential	Small C&I
1		Forecasted Annual Revenue Per Avg. Monthly Customer	$170.48	$151.86
2		Actual 2015 Revenue Per Avg. Monthly Customer	$148.99	$146.44
3	Line 1 - Line 2	Under/(Over) Collection Revenues Per Customer (Line 3-Line 4)	$21.49	$5.42
4		Forecasted Average Monthly Customers	192,587	10,959
5		2015 Actual Average Monthly Customers	200,979	9,983
6	Greater of Line 4 or 5 x Line 3	Calculated Surcharge/(Refund) per Customer Class	$4,319,039	$59,398
7		Cap	$3,283,315	$166,426
8	Lower of Line 6 and Line 7	Actual Surcharge/(Refund) per Customer Class	$3,283,315	$59,398

1. Residential Customers

For 2015, MERC would have surcharged its residential customers $4.3 million if there had not been a cap (see Line 6). However, the 10 percent cap for residential surcharges and refunds is $3,283,235 (Line 7).[7] Thus, MERC requested approval for a residential surcharge of $3,283,235 for 2015 (Line 8). The Department has reviewed MERC's residential surcharge calculations and recommends that the Commission approve a surcharge of $3,283,235 for residential customers.

For Reply Comments, the Department recommends that MERC provide estimates of the impact of the $3,283,235 surcharge on MERC's Residential customer rates (*i.e.*, the surcharge per Dth) and on the average annual residential bill.

[7] $32,832,351 x 10 percent=$3,283,235.

2. Small C&I Customer Class

For 2015, MERC calculated a surcharge of $59,395 (Line 6) for its small C&I customers (slightly different than amount shown in Line 6 due to rounding). The cap for MERC's Small C&I customers is $166,426 (Line 7). Since the cap is not encountered, MERC's Small C&I surcharge for 2015 is $59,395 (Line 8). The Department has reviewed MERC's Small C&I surcharge calculations and recommends that the Commission approve a surcharge of $59,395.

For Reply Comments, the Department recommends that MERC provide estimates of the impact of the $59,395 surcharge on MERC's Small C&I customer rates (*i.e.*, the surcharge per Dth) and on the average annual Small C&I bill.

E. RECOMMENDATIONS

The Department recommends that the Commission approve

- A surcharge of $3,283,315 for its Residential customers; and
- A surcharge of $59,395 for its Small C&I customer class,
- For a total of $3,342,631.

In addition, the Department recommends that in Reply Comments, the Company provide an estimate of the impact of the RDM customer classes' surcharges on rates and average bills.

Finally, the Department recommends than in Reply Comments, MERC explain whether the Company could provide energy savings for its Small C&I customer class separate from its other classes.

/lt

CERTIFICATE OF SERVICE

I, Sharon Ferguson, hereby certify that I have this day, served copies of the following document on the attached list of persons by electronic filing, certified mail, e-mail, or by depositing a true and correct copy thereof properly enveloped with postage paid in the United States Mail at St. Paul, Minnesota.

Minnesota Department of Commerce
Comments

Docket No. G007,011/GR-10-977

Dated this 1st day of June 2016

/s/Sharon Ferguson

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Michael	Ahern	ahern.michael@dorsey.com	Dorsey & Whitney, LLP	50 S 6th St Ste 1500 Minneapolis, MN 554021498	Electronic Service	No	OFF_SL_10-977_Official
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_10-977_Official
Christopher	Anderson	canderson@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022191	Electronic Service	No	OFF_SL_10-977_Official
Michael	Auger	mauger@usenergyservices.com	U S Energy Services, Inc.	Suite 1200 605 Highway 169 N Minneaplis, MN 554416531	Electronic Service	No	OFF_SL_10-977_Official
James J.	Bertrand	james.bertrand@stinson.com	Stinson Leonard Street LLP	150 South Fifth Street, Suite 2300 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_10-977_Official
Kathleen M.	Brennan	kmb@mcgrannshea.com	McGrann Shea Carnival, Straughn & Lamb, Chartered	N/A	Electronic Service	No	OFF_SL_10-977_Official
Seth	DeMerritt	ssdemerritt@integrysgroup.com	MERC (Holding)	700 North Adams P.O. Box 19001 Green Bay, WI 543079001	Electronic Service	No	OFF_SL_10-977_Official
Ian	Dobson	ian.dobson@ag.state.mn.us	Office of the Attorney General-RUD	Antitrust and Utilities Division 445 Minnesota Street, 1400 BRM Tower St. Paul, MN 55101	Electronic Service	No	OFF_SL_10-977_Official
Richard	Eichstadt	richard.eichstadt@poet.com	Poet Biorefining - Preston	701 Industrial Dr N PO Box 440 Preston, MN 55965	Electronic Service	No	OFF_SL_10-977_Official
Darcy	Fabrizius	Darcy.fabrizius@constellation.com	Constellation Energy	N21 W23340 Ridgeview Pkwy Waukesha, WI 53188	Electronic Service	No	OFF_SL_10-977_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Emma	Fazio	emma.fazio@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_10-977_Official
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_10-977_Official
David P.	Geschwind	dp.geschwind@smmpa.org	Southern Minnesota Municipal Power Agency	500 First Avenue SW Rochester, MN 55902	Electronic Service	No	OFF_SL_10-977_Official
Annete	Henkel	mui@mnutilityinvestors.org	Minnesota Utility Investors	413 Wacouta Street #230 St.Paul, MN 55101	Electronic Service	No	OFF_SL_10-977_Official
Eric	Johnson	Eric.Johnson@ever-greenenergy.com	Ever-Green Energy	1350 Landmark Towers 345 St. Peter Street St. Paul, MN 55102	Electronic Service	No	OFF_SL_10-977_Official
David G.	Kult	dgkult@minnesotaenergyresources.com	Minnesota Energy Resources Corporation	2665 145th St. NW Rosemount, MN 55068	Electronic Service	No	OFF_SL_10-977_Official
David	Kyto	djkyto@integrysgroup.com	Integrys Business Support	700 North Adams PO Box 19001 Green Bay, WI 543079001	Electronic Service	No	OFF_SL_10-977_Official
James D.	Larson	james.larson@avantenergy.com	Avant Energy Services	220 S 6th St Ste 1300 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_10-977_Official
Amber	Lee	ASLee@minnesotaenergyresources.com	Minnesota Energy Resources Corporation	2665 145th St W Rosemount, MN 55068	Electronic Service	No	OFF_SL_10-977_Official
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_10-977_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Eric	Lipman	eric.lipman@state.mn.us	Office of Administrative Hearings	PO Box 64620 St. Paul, MN 551640620	Electronic Service	No	OFF_SL_10-977_Official
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_10-977_Official
Pam	Marshall	pam@energycents.org	Energy CENTS Coalition	823 7th St E St. Paul, MN 55106	Electronic Service	No	OFF_SL_10-977_Official
Thomas R.	Maus		Energy Associates, Inc.	254 Highway 33 North Cloquet, MN 557209403	Paper Service	No	OFF_SL_10-977_Official
Mike	McGlone	N/A	Heat Share - Salvation Army	2445 Prior Avenue Roseville, MN 55113	Paper Service	No	OFF_SL_10-977_Official
Brian	Meloy	brian.meloy@stinson.com	Stinson,Leonard, Street LLP	150 S 5th St Ste 2300 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_10-977_Official
Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP	33 South Sixth St Ste 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_10-977_Official
Jeff	Sande		Bemidji State University	Box 1 Deputy Hall 1500 Birchmont Drive Bemidji, MN 566012699	Paper Service	No	OFF_SL_10-977_Official
Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates	Ste 122 9100 W Bloomington Frwy Bloomington, MN 55431	Electronic Service	No	OFF_SL_10-977_Official
Byron E.	Starns	byron.starns@stinson.com	Stinson Leonard Street LLP	150 South 5th Street Suite 2300 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_10-977_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Kristin	Stastny	kstastny@briggs.com	Briggs and Morgan, P.A.	2200 IDS Center 80 South 8th Street Minneapolis, MN 55402	Electronic Service	No	OFF_SL_10-977_Official
Eric	Swanson	eswanson@winthrop.com	Winthrop Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_10-977_Official
Casey	Whelan	cwhelan@usenergyservices.com	U.S. Energy Services, Inc.	605 Highway 169 N Ste 1200 Plymouth, MN 55441	Electronic Service	No	OFF_SL_10-977_Official
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_10-977_Official