MINNESOTA DEPARTMENT OF COMMERCE

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AN EQUAL OPPORTUNITY EMPLOYER

November 14, 2015

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

RE: **Supplemental Comments of the Minnesota Department of Commerce, Division of Energy Resources**
Docket No. G002/M-16-649

Dear Mr. Wolf:

Attached are the *Supplemental Comments* of the Minnesota Department of Commerce, Division of Energy Resources (Department) in response to the *Supplemental Filing* submitted in the following matter:

> Petition of Northern States Power Company (Xcel or the Company) for Approval of Changes in Contract Demand Entitlements.

The *Supplemental Filing* was filed on November 1, 2016. The petitioner on behalf of Xcel is:

> Amy A. Liberkowski
> Manager, Regulatory Analysis
> Xcel Energy
> 414 Nicollet Mall
> Minneapolis, MN 55401

To ensure that the record is complete in this docket, the Department provides the following response to Xcel's November 1, 2016 *Supplemental Filing.* The Department recommends that the Minnesota Public Utilities Commission (Commission) **accept** the Company's proposed level of demand entitlement and allow Xcel to recover associated demand costs through the monthly Purchased Gas Adjustment (PGA) effective November 1, 2016.

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

Sincerely,

/s/ MICHAEL RYAN
Rates Analyst

MR/lt
Attachment

# BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

# SUPPLEMENTAL COMMENTS OF THE
# MINNESOTA DEPARTMENT OF COMMERCE
# DIVISION OF ENERGY RESOURCES

DOCKET NO. G002/M-16-649

## I. BACKGROUND

Northern States Power Company (Xcel or the Company) filed a demand entitlement petition (*Petition*) on August 1, 2016, with the Minnesota Public Utilities Commission (Commission). On September 28, 2016 the Minnesota Department of Commerce, Division of Energy Resources (Department) filed *Comments* in response to the Company's *Petition.* In its *Comments*, the Department supported the Company's *Petition* and recommended that the Commission approve the Company's proposed cost recovery and demand entitlement levels, subject to possible adjustment in the Company's November 1, 2016 supplemental filing.

On November 1, 2016, the Company filed its *Supplemental Filing* which showed the final demand entitlement volumes and costs that would be charged to ratepayers. The Company noted that there have been a couple of changes to the firm transport entitlement levels since the original August 1, 2016 filing.

In the *Supplemental Filing*, the Company reported that Xcel originally planned to purchase 16,371 Dekatherms (Dth) per day of firm, winter only capacity on Viking Gas Transmission (Viking). Due to market conditions and competition in the bidding process, the Company was forced to add an additional month and contract for six months instead of the traditional heating season or the five-month period of November through March. The capacity was needed to meet the design-day so the Company moved forward and transacted for six months. The additional month equates to an increased cost of $77,774.

As discussed in *Comments* by the Department, Xcel reported substantial year-over-year increase in ANR Pipeline (ANR) capacity cost even though no new capacity is being added. The increase is due to ANR's pending rate case with the Federal Energy Regulatory Commission (FERC). In the Company's *Supplemental Filing*, Xcel stated that a settlement document has been drafted and filed with FERC for approval. The settlement is ongoing, but would result in lower rates than originally filed in the *Petition*. The expected rates are $636,086 lower than those reflected in the *Petition*.

Finally, the Company reported that seven call options and one collar arrangement were executed for the 2016-2017 heating season to cover the targeted supply quantity.[1] The total hedging costs are $1,515,945 for the heating season.

The Department responds to the *Supplemental Filing* below.

## II. THE DEPARTMENT'S ANALYSIS OF THE COMPANY'S SUPPLEMENTAL FILING

The Department offers the following analysis of the Company's *Supplemental Filing*, addressing:

- the revised demand entitlement costs,
- the additional hedging transactions, and
- the associated Purchased Gas Adjustment (PGA) cost.

### *A. SUPPLIER ENTITLEMENT CHANGES*

Although the cost associated with the ANR demand entitlements are assumed to be reduced by $636,086 compared to the original Petition, there is still an aggregate year-over-year increase of $722,619[2] in entitlements across all pipelines for the 2016-2017 heating season as shown in Table 1 below.

| Type of Entitlement | Proposed Dth Change | Rate | Months | Proposed Cost Change |
|---|---|---|---|---|
| NNG TFX (Nov-Mar) | 1,539 | $8.6272 | 5 | $66,386.30 |
| NNG TFX (Apr-Oct) | 1,539 | $4.0000 | 7 | $43,092.00 |
| VGT FT-A (Dec-Feb) | (12,428) | $4.7507 | 3 | $ (177,125.10) |
| VGT FT-A (Nov-Apr) | 16,371 | $4.7507 | 6 | $466,642.26 |
| ANR FSS (Jan-Dec) | (44) | $1.7820 | 12 | $ (940.90) |
| ANR FSS (Jan-Dec) | (15,300) | $1.7820 | 12 | $ (327,175.20) |
| ANR FSS (Jan-Dec) | 15,300 | $1.7820 | 12 | $327,175.20 |
| ANR FTS (Jan-Dec) | (4,829) | $9.4000 | 12 | $ (544,711.20) |
| ANR FTS (Jan-Dec) | 4,829 | $12.4690 | 12 | $722,553.61 |
| ANR FTS (Nov-Mar) | (15,171) | $4.4000 | 5 | $ (333,762.00) |
| ANR FTS (Nov-Mar) | 15,171 | $5.7290 | 5 | $434,573.30 |
| ANR FTS (Apr-Oct) | (4,935) | $4.4000 | 7 | $ (151,998.00) |
| ANR FTS (Apr-Oct) | 4,935 | $5.7290 | 7 | $197,908.31 |
| **Total for Change in Pipeline Entitlement** | | | | **$722,618.58** |

[1] Xcel Supplemental Filing as of November 1, 2016, REVISED Attachment 3, Schedule 1.
[2] The August 1, 2016 *Petition* Change to Pipeline Entitlement was $1,280,932. By subtracting the reduced ANR cost of $636,086 and adding the additional month of Viking pipeline transportation at $77,774 in the *Supplemental Filing*, the result is $722,619.

*1. Northern Natural Gas (NNG)*

The one change to NNG capacity was addressed in the Departments *Comments* dated September 28, 2016. Xcel added 1,539 Dth/day of incremental capacity to serve St. Cloud, MN and to serve peak load. The Department does not see any issue with the additional contract to serve the St. Cloud area.

*2. Viking Gas Transmission*

The Company was forced to competitively bid for the winter-only capacity on Viking that it has been able to secure for shorter periods in the past. Given that the Viking capacity required an additional month to allow the Company to retain the capacity, it is reasonable that the Company would secure the capacity for the additional cost.

*3. ANR Pipeline*

The increases to ANR capacity are due to the pending pipeline rate case with FERC. The Company has entered into long-term contracts with ANR and the contracts are subject to FERC-approved rate changes. Although Xcel does not have the ability to negotiate the rates charged by ANR, the Company was able to intervene in the rate case. The ANR pipeline capacity is required to serve customers; therefore, the Department considers the increase reasonable due to Xcel's inability to control FERC's ultimate decision.

The Department concludes that Xcel's proposed suppler entitlement changes are reasonable.

*B. HEDGING TRANSACTIONS*

The Company provided updated hedging transactions, showing that six call options and one collar were executed for the 2016-2017 heating season, covering the Company's entire targeted supply quantity. As discussed above, the total hedging costs are $1,515,945 for the heating season. The Department will not comment on these hedging transactions here, as our analysis will be included in a future Annual Automatic Adjustment Report.

*C. XCEL'S PGA COST RECOVERY PROPOSAL UPDATE*

Xcel proposed to reflect the costs associated with its proposed demand entitlements in the purchased gas adjustment (PGA) effective November 1, 2016. The demand entitlements in Xcel's Trade Secret Revised Attachment 2, Schedule 1, Page 1 of 2, represent the demand entitlements for which the Company's firm customers will pay. Department Attachment 1 compares the October 2016 PGA costs to the November 2016 PGA costs for several customer classes. The resulting cost changes, related strictly to changes in demand costs, have the following annual rate effects.

- Annual demand costs decrease by $0.0091/Dth, or approximately $0.79 annually, for the average Residential customer consuming 87 Dth annually;

- Annual demand costs decrease by $0.0091/Dth, or approximately $2.58 annually, for the average Small Commercial customer consuming 284 Dth annually;
- Annual demand costs decrease by $0.0091/Dth, or approximately $13.31 annually, for the average Large Commercial customer consuming 1,463 Dth annually; and
- No Change in annual demand costs for the average Small Interruptible, Medium Interruptible, and Large Interruptible customers. These customer classes are not allocated demand costs under the current cost allocation plan.

The bill impacts described above relate solely to changes in demand cost and are based on the demand data provided by the Company. Based on its review, the Department concludes that the Company's proposal appears to be reasonable.

## III. THE DEPARTMENT'S RECOMMENDATIONS

The Department recommends that the Commission:

- Approve Xcel's proposed level of demand entitlements as amended by its *Supplemental Filing;* and
- Allow Xcel to recover associated demand costs through the monthly Purchased Gas Adjustment effective November 1, 2016.

/lt

| **Residential** | Last Rate Case (G002/GR-09-1153) | Last Approved Demand Change (G002/M-15-727) | Most Recent PGA: October 10/1/16 | Proposed Demand Changes 11/1/16[1] | % Change From Last Rate Case | % Change From Last Demand Change | % Change From Last PGA | $ Change From Last PGA |
|---|---|---|---|---|---|---|---|---|
| Commodity Cost of Gas (WACOG) | $5.5042 | $2.8402 | $2.9663 | $2.9023 | -47.27% | 2.19% | -2.16% | ($0.0640) |
| Demand Cost of Gas[2] | $0.9008 | $0.8220 | $0.8441 | $0.8350 | -7.30% | 1.58% | -1.08% | ($0.0091) |
| Distribution Margin | $1.8591 | $1.8591 | $1.8591 | $1.8591 | 0.00% | 0.00% | 0.00% | $0.0000 |
| Total per Dth Cost | $8.2641 | $5.5213 | $5.6695 | $5.5964 | -32.28% | 1.36% | -1.29% | ($0.0731) |
| Average Annual Usage (Dk) | 87 | 87 | 87 | 87 | | | | |
| Average Annual Total Cost | $718.60 | $480.10 | $492.98 | $486.63 | -32.28% | 1.36% | -1.29% | ($6.35) |
| Average Annual Total Demand Cost of Gas | $78.33 | $71.48 | $73.40 | $72.61 | | | **Current Allocation** | **($0.79)** |

| **Small Commercial** | Last Rate Case (G002/GR-09-1153) | Last Approved Demand Change (G002/M-15-727) | Most Recent PGA: October 10/1/16 | Proposed Demand Changes 11/1/16[1] | % Change From Last Rate Case | % Change From Last Demand Change | % Change From Last PGA | $ Change From Last PGA |
|---|---|---|---|---|---|---|---|---|
| Commodity Cost of Gas (WACOG) | $5.4871 | $2.8402 | $2.9663 | $2.9023 | -47.11% | 2.19% | -2.16% | ($0.0640) |
| Demand Cost of Gas[2] | $0.8984 | $0.8254 | $0.8397 | $0.8306 | -7.55% | 0.63% | -1.08% | ($0.0091) |
| Distribution Margin | $1.2331 | $1.2331 | $1.2331 | $1.2331 | 0.00% | 0.00% | 0.00% | $0.0000 |
| Total per Dth Cost | $7.6186 | $4.8987 | $5.0391 | $4.9660 | -34.82% | 1.37% | -1.45% | ($0.0731) |
| Average Annual Usage (Dk) | 284 | 284 | 284 | 284 | | | | |
| Average Annual Total Cost | $2,163.87 | $1,391.35 | $1,431.23 | $1,410.47 | -34.82% | 1.37% | -1.45% | ($20.76) |
| Average Annual Total Demand Cost of Gas | $255.17 | $234.43 | $238.50 | $235.91 | | | **Current Allocation** | **($2.58)** |

| **Large Commercial** | Last Rate Case (G002/GR-09-1153) | Last Approved Demand Change (G002/M-15-727) | Most Recent PGA: October 10/1/16 | Proposed Demand Changes 11/1/16[1] | % Change From Last Rate Case | % Change From Last Demand Change | % Change From Last PGA | $ Change From Last PGA |
|---|---|---|---|---|---|---|---|---|
| Commodity Cost of Gas (WACOG) | $5.4871 | $2.8402 | $2.9663 | $2.9023 | -47.11% | 2.19% | -2.16% | ($0.0640) |
| Demand Cost of Gas[2] | $0.8917 | $0.8099 | $0.8397 | $0.8306 | -6.85% | 2.56% | -1.08% | ($0.0091) |
| Distribution Margin | $1.2315 | $1.2315 | $1.2315 | $1.2315 | 0.00% | 0.00% | 0.00% | $0.0000 |
| Total per Dth Cost | $7.6103 | $4.8816 | $5.0375 | $4.9644 | -34.77% | 1.70% | -1.45% | ($0.0731) |
| Average Annual Usage (Dk) | 1,463 | 1,463 | 1,463 | 1,463 | | | | |
| Average Annual Total Cost | $11,131.14 | $7,140.04 | $7,368.06 | $7,261.14 | -34.77% | 1.70% | -1.45% | ($106.92) |
| Average Annual Total Demand Cost of Gas | $1,304.24 | $1,184.59 | $1,228.18 | $1,214.87 | | | **Current Allocation** | **($13.31)** |

| **Small Interruptible** | Last Rate Case (G002/GR-09-1153) | Last Approved Demand Change (G002/M-15-727) | Most Recent PGA: October 10/1/16 | Proposed Demand Changes 11/1/16[1] | % Change From Last Rate Case | % Change From Last Demand Change | % Change From Last PGA | $ Change From Last PGA |
|---|---|---|---|---|---|---|---|---|
| Commodity Cost of Gas (WACOG) | $5.4926 | $2.8402 | $2.9663 | $2.9023 | -47.16% | 2.19% | -2.16% | ($0.0640) |
| Demand Cost of Gas[2] | $0.0000 | $0.0000 | $0.0000 | $0.0000 | NA | NA | NA | $0.0000 |
| Distribution Margin | $0.9635 | $0.9635 | $0.9635 | $0.9635 | 0.00% | 0.00% | 0.00% | $0.0000 |
| Total per Dth Cost | $6.4561 | $3.8037 | $3.9298 | $3.8658 | -40.12% | 1.63% | -1.63% | ($0.0640) |
| Average Annual Usage (Dk) | 7,936 | 7,936 | 7,936 | 7,936 | | | | |
| Average Annual Total Cost | $51,235.93 | $30,186.48 | $31,187.21 | $30,679.31 | -40.12% | 1.63% | -1.63% | ($507.90) |
| Average Annual Total Demand Cost of Gas | $0.00 | $0.00 | $0.00 | $0.00 | | | **Current Allocation** | **$0.00** |

| **Medium Interruptible** | Last Rate Case (G002/GR-09-1153) | Last Approved Demand Change (G002/M-15-727) | Most Recent PGA: October 10/1/16 | Proposed Demand Changes 11/1/16[1] | % Change From Last Rate Case | % Change From Last Demand Change | % Change From Last PGA | $ Change From Last PGA |
|---|---|---|---|---|---|---|---|---|
| Commodity Cost of Gas (WACOG) | $5.4696 | $2.8402 | $2.9663 | $2.9023 | -46.94% | 2.19% | -2.16% | ($0.0640) |
| Demand Cost of Gas[2] | $0.0000 | $0.0000 | $0.0000 | $0.0000 | NA | NA | NA | $0.0000 |
| Distribution Margin | $0.4751 | $0.4751 | $0.4751 | $0.4751 | 0.00% | 0.00% | 0.00% | $0.0000 |
| Total per Dth Cost | $5.9447 | $3.3153 | $3.4414 | $3.3774 | -43.19% | 1.87% | -1.86% | ($0.0640) |
| Average Annual Usage (Dk) | 64,709 | 64,709 | 64,709 | 64,709 | | | | |
| Average Annual Total Cost | $384,676.89 | $214,531.04 | $222,690.85 | $218,549.47 | -43.19% | 1.87% | -1.86% | ($4,141.38) |
| Average Annual Total Demand Cost of Gas | $0.00 | $0.00 | $0.00 | $0.00 | | | **Current Allocation** | **$0.00** |

| **Large Interruptible** | Last Rate Case (G002/GR-09-1153) | Last Approved Demand Change (G002/M-15-727) | Most Recent PGA: October 10/1/16 | Proposed Demand Changes 11/1/16[1] | % Change From Last Rate Case | % Change From Last Demand Change | % Change From Last PGA | $ Change From Last PGA |
|---|---|---|---|---|---|---|---|---|
| Commodity Cost of Gas (WACOG) | $5.5501 | $2.8402 | $2.9663 | $2.9023 | -47.71% | 2.19% | -2.16% | ($0.0640) |
| Demand Cost of Gas[2] | $0.0000 | $0.0000 | $0.0000 | $0.0000 | NA | NA | NA | $0.0000 |
| Distribution Margin | $0.4346 | $0.4346 | $0.4346 | $0.4346 | 0.00% | 0.00% | 0.00% | $0.0000 |
| Total per Dth Cost | $5.9847 | $3.2748 | $3.4009 | $3.3369 | -44.24% | 1.90% | -1.88% | ($0.0640) |
| Average Annual Usage (Dk) | 745,979 | 745,979 | 745,979 | 745,979 | | | | |
| Average Annual Total Cost | $4,464,438.14 | $2,442,939.49 | $2,537,007.44 | $2,489,264.78 | -44.24% | 1.90% | -1.88% | ($47,742.66) |
| Average Annual Total Demand Cost of Gas | $0.00 | $0.00 | $0.00 | $0.00 | | | **Current Allocation** | **$0.00** |

| **Current Allocation** Summary Change from most recent PGA Customer Class | Commodity Change ($/Dth) | Commodity Change (Percent) | Demand Change ($/Dth) | Demand Change (Percent) | Demand Annual Change ($/Dth) | Total Annual Change ($/Dth) | Total Annual Change (Percent) |
|---|---|---|---|---|---|---|---|
| Residential | -$0.0640 | -2.16% | -$0.0091 | -1.08% | ($0.79) | ($6.35) | -1.29% |
| Small Commercial | -$0.0640 | -2.16% | -$0.0091 | -1.08% | ($2.58) | ($20.76) | -1.45% |
| Large Commercial | -$0.0640 | -2.16% | -$0.0091 | -1.08% | ($13.31) | ($106.92) | -1.45% |
| Small Interruptible | -$0.0640 | -2.16% | $0.0000 | NA | $0.00 | ($507.90) | -1.63% |
| Medium Interruptible | -$0.0640 | -2.16% | $0.0000 | NA | $0.00 | ($4,141.38) | -1.86% |
| Large Interruptible | -$0.0640 | -2.16% | $0.0000 | NA | $0.00 | ($47,742.66) | -1.88% |

[1]The Commodity Cost (WACOG) in Xcel Supplemental Filing as of November 1, 2016, REVISED Attachment 2, Schedule 2 doesn't include Kansas Property Tax. This attachment has been updated to include Kansas Property Tax and match the November 2016 PGA Report.

[2]Does not include demand smoothing

# 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
Supplemental Comments

Docket No. G002/M-16-649

Dated this 14th day of November 2016

/s/Sharon Ferguson

| First Name | Last Name | Email | Company Name | Address | Delivery Method | View Trade Secret | Service List Name |
|---|---|---|---|---|---|---|---|
| Tamie A. | Aberle | tamie.aberle@mdu.com | Great Plains Natural Gas Co. | 400 North Fourth Street<br>Bismarck, ND 585014092 | Electronic Service | No | OFF_SL_16-649_M-16-649 |
| Julia | Anderson | Julia.Anderson@ag.state.mn.us | Office of the Attorney General-DOC | 1800 BRM Tower<br>445 Minnesota St<br>St. Paul, MN 551012134 | Electronic Service | Yes | OFF_SL_16-649_M-16-649 |
| Kristine | Anderson | kanderson@greatermngas.com | Greater Minnesota Gas, Inc. | 202 S. Main Street<br>Le Sueur, MN 56058 | Electronic Service | No | OFF_SL_16-649_M-16-649 |
| Christopher | Anderson | canderson@allete.com | Minnesota Power | 30 W Superior St<br>Duluth, MN 558022191 | Electronic Service | No | OFF_SL_16-649_M-16-649 |
| Alison C | Archer | alison.c.archer@xcelenergy.com | Xcel Energy | 414 Nicollet Mall FL 5<br>Minneapolis, MN 55401 | Electronic Service | No | OFF_SL_16-649_M-16-649 |
| Gail | Baranko | gail.baranko@xcelenergy.com | Xcel Energy | 414 Nicollet Mall7th Floor<br>Minneapolis, MN 55401 | Electronic Service | No | OFF_SL_16-649_M-16-649 |
| William A. | Blazar | bblazar@mnchamber.com | Minnesota Chamber Of Commerce | Suite 1500<br>400 Robert Street North<br>St. Paul, MN 55101 | Electronic Service | No | OFF_SL_16-649_M-16-649 |
| Robert S. | Carney, Jr. | | | 4232 Colfax Ave. S.<br>Minneapolis, MN 55409 | Paper Service | No | OFF_SL_16-649_M-16-649 |
| George | Crocker | gwillc@nawo.org | North American Water Office | PO Box 174<br>Lake Elmo, MN 55042 | Electronic Service | No | OFF_SL_16-649_M-16-649 |
| Carl | Cronin | Regulatory.records@xcelenergy.com | Xcel Energy | 414 Nicollet Mall FL 7<br>Minneapolis, MN 554011993 | Electronic Service | No | OFF_SL_16-649_M-16-649 |
| Jeffrey A. | Daugherty | jeffrey.daugherty@centerpointenergy.com | CenterPoint Energy | 800 LaSalle Ave<br>Minneapolis, MN 55402 | Electronic Service | No | OFF_SL_16-649_M-16-649 |

| First Name | Last Name | Email | Company Name | Address | Delivery Method | View Trade Secret | Service List Name |
|---|---|---|---|---|---|---|---|
| Ian | Dobson | ian.dobson@ag.state.mn.us | Office of the Attorney General-RUD | Antitrust and Utilities Division 445 Minnesota Street, 1400 BRM Tower St. Paul, MN 55101 | Electronic Service | No | OFF_SL_16-649_M-16-649 |
| Rebecca | Eilers | rebecca.d.eilers@xcelenergy.com | Xcel Energy | 414 Nicollet Mall - 401 7th Floor Minneapolis, MN 55401 | Electronic Service | No | OFF_SL_16-649_M-16-649 |
| 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_16-649_M-16-649 |
| Edward | Garvey | garveyed@aol.com | Residence | 32 Lawton St Saint Paul, MN 55102 | Electronic Service | No | OFF_SL_16-649_M-16-649 |
| Todd J. | Guerrero | todd.guerrero@kutakrock.com | Kutak Rock LLP | Suite 1750 220 South Sixth Street Minneapolis, MN 554021425 | Electronic Service | No | OFF_SL_16-649_M-16-649 |
| Annete | Henkel | mui@mnutilityinvestors.org | Minnesota Utility Investors | 413 Wacouta Street #230 St.Paul, MN 55101 | Electronic Service | No | OFF_SL_16-649_M-16-649 |
| Sandra | Hofstetter | sHofstetter@mnchamber.com | MN Chamber of Commerce | 7261 County Road H Fremont, WI 54940-9317 | Electronic Service | No | OFF_SL_16-649_M-16-649 |
| Michael | Hoppe | il23@mtn.org | Local Union 23, I.B.E.W. | 932 Payne Avenue St. Paul, MN 55130 | Electronic Service | No | OFF_SL_16-649_M-16-649 |
| Richard | Johnson | Rick.Johnson@lawmoss.com | Moss & Barnett | 150 S. 5th Street Suite 1200 Minneapolis, MN 55402 | Electronic Service | No | OFF_SL_16-649_M-16-649 |

| First Name | Last Name | Email | Company Name | Address | Delivery Method | View Trade Secret | Service List Name |
|---|---|---|---|---|---|---|---|
| Michael | Krikava | mkrikava@briggs.com | Briggs And Morgan, P.A. | 2200 IDS Center<br>80 S 8th St<br>Minneapolis,<br>MN<br>55402 | Electronic Service | No | OFF_SL_16-649_M-16-649 |
| Nicolle | Kupser | nkupser@greatermngas.com | Greater Minnesota Gas, Inc. | 202 South Main Street<br>P.O. Box 68<br>Le Sueur,<br>MN<br>56058 | Electronic Service | No | OFF_SL_16-649_M-16-649 |
| John | Lindell | john.lindell@ag.state.mn.us | Office of the Attorney General-RUD | 1400 BRM Tower<br>445 Minnesota St<br>St. Paul,<br>MN<br>551012130 | Electronic Service | Yes | OFF_SL_16-649_M-16-649 |
| Eric | Lipman | eric.lipman@state.mn.us | Office of Administrative Hearings | PO Box 64620<br><br>St. Paul,<br>MN<br>551640620 | Electronic Service | Yes | OFF_SL_16-649_M-16-649 |
| Matthew P | Loftus | matthew.p.loftus@xcelenergy.com | Xcel Energy | 414 Nicollet Mall FL 5<br><br>Minneapolis,<br>MN<br>55401 | Electronic Service | No | OFF_SL_16-649_M-16-649 |
| Pam | Marshall | pam@energycents.org | Energy CENTS Coalition | 823 7th St E<br><br>St. Paul,<br>MN<br>55106 | Electronic Service | No | OFF_SL_16-649_M-16-649 |
| Mary | Martinka | mary.a.martinka@xcelenergy.com | Xcel Energy Inc | 414 Nicollet Mall<br>7th Floor<br>Minneapolis,<br>MN<br>55401 | Electronic Service | No | OFF_SL_16-649_M-16-649 |
| David | Moeller | dmoeller@allete.com | Minnesota Power | 30 W Superior St<br><br>Duluth,<br>MN<br>558022093 | Electronic Service | No | OFF_SL_16-649_M-16-649 |
| Andrew | Moratzka | andrew.moratzka@stoel.com | Stoel Rives LLP | 33 South Sixth St Ste 4200<br><br>Minneapolis,<br>MN<br>55402 | Electronic Service | No | OFF_SL_16-649_M-16-649 |
| David | Niles | david.niles@avantenergy.com | Minnesota Municipal Power Agency | 220 South Sixth Street<br>Suite 1300<br>Minneapolis,<br>Minnesota<br>55402 | Electronic Service | No | OFF_SL_16-649_M-16-649 |

| First Name | Last Name | Email | Company Name | Address | Delivery Method | View Trade Secret | Service List Name |
|---|---|---|---|---|---|---|---|
| Samantha | Norris | samanthanorris@alliantenergy.com | Interstate Power and Light Company | 200 1st Street SE PO Box 351<br><br>Cedar Rapids,<br>IA<br>524060351 | Electronic Service | No | OFF_SL_16-649_M-16-649 |
| Greg | Palmer | gpalmer@greatermngas.com | Greater Minnesota Gas, Inc. | PO Box 68<br>202 South Main Street<br>Le Sueur,<br>MN<br>56058 | Electronic Service | No | OFF_SL_16-649_M-16-649 |
| Richard | Savelkoul | rsavelkoul@martinsquires.com | Martin & Squires, P.A. | 332 Minnesota Street Ste W2750<br><br>St. Paul,<br>MN<br>55101 | Electronic Service | No | OFF_SL_16-649_M-16-649 |
| Janet | Shaddix Elling | jshaddix@janetshaddix.com | Shaddix And Associates | Ste 122<br>9100 W Bloomington Frwy<br>Bloomington,<br>MN<br>55431 | Electronic Service | No | OFF_SL_16-649_M-16-649 |
| James M. | Strommen | jstrommen@kennedy-graven.com | Kennedy & Graven, Chartered | 470 U.S. Bank Plaza<br>200 South Sixth Street<br>Minneapolis,<br>MN<br>55402 | Electronic Service | No | OFF_SL_16-649_M-16-649 |
| Lisa | Veith | lisa.veith@ci.stpaul.mn.us | City of St. Paul | 400 City Hall and Courthouse<br>15 West Kellogg Blvd.<br>St. Paul,<br>MN<br>55102 | Electronic Service | No | OFF_SL_16-649_M-16-649 |
| Cam | Winton | cwinton@mnchamber.com | Minnesota Chamber of Commerce | 400 Robert Street North<br>Suite 1500<br>St. Paul,<br>Minnesota<br>55101 | Electronic Service | No | OFF_SL_16-649_M-16-649 |
| Daniel P | Wolf | dan.wolf@state.mn.us | Public Utilities Commission | 121 7th Place East<br>Suite 350<br>St. Paul,<br>MN<br>551012147 | Electronic Service | Yes | OFF_SL_16-649_M-16-649 |