



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

---

April 13, 2015

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

RE: **Comments of the Minnesota Department of Commerce, Division of Energy Resources**  
Docket No. E002/M-15-111  
Docket No. E017/M-15-112  
Docket No. E015/M-15-120  
Docket No. E001/M-15-200

Dear Mr. Wolf,

On February 10 and March 4, 2015, the Minnesota Public Utilities Commission (Commission) issued notices seeking comment on proposed electric vehicle charging tariffs filed in the above-referenced dockets. Attached please find the comments of the Minnesota Department of Commerce, Division of Energy Resources (Department). The Department is available to answer any questions the Commission may have.

Sincerely,

/s/ SUSAN L. PEIRCE  
Rates Analyst

SLP/lt  
Attachment

BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

COMMENTS OF THE  
MINNESOTA DEPARTMENT OF COMMERCE  
DIVISION OF ENERGY RESOURCES

DOCKET NOS. E002/M-15-111, E017/M-15-112, E015/M-15-120,  
E001/M-15-200

**I. BACKGROUND INFORMATION**

The 2014 Legislature passed Minn. Stat. §216B.1614 (EV Statute) requiring each investor-owned utility to file an Electric Vehicle tariff (EV tariff) for the purchase of electricity for recharging electric vehicles. The statute applies to Minnesota Power (MP), Xcel Energy (Xcel), Otter Tail Power Company (OTP) and Interstate Power & Light (IPL). All four utilities have filed proposed EV tariffs.

On February 3, 2015 and March 4, 2015, the Commission issued notices seeking comment on the proposed EV tariffs. Specifically, the Commission sought comment on the following topics:

- Is the proposed tariff in compliance with the EV tariff legislation?
- Should the hours designated as on- and off-peak be the same for all utilities?
- The EV tariff legislation requires utilities to provide a renewable-sourced electricity option; how should this rate be calculated?
- Will a separate meter or sub-meter be necessary to implement the EV tariff? If so, how should the cost of the meter be calculated and incorporated into rates?
- How frequently should the utility be required to report on EV tariff participation?
- What, if any, additional information should the Commission require in the utility's EV tariff reports?

The Department offers the following general comments on topics posed by the Commission, followed by comments on the proposed tariff of each utility.

## II. DEPARTMENT ANALYSIS

Minn. Stat. §216B.1614 (EV Statute) requires that EV tariffs include the following:

1. Contain either a time-of-day or off-peak rate, as elected by the public utility;
2. Offer a customer the option to purchase electricity from the utility's current mix of energy supply sources or entirely from renewable energy sources
3. Be made available to the residential customer class.
4. Appropriately reflect off-peak versus peak cost differences in the rates.
5. Incorporate the cost of metering or submetering within the rate charged to the customer.
6. Provide clear and transparent customer billing statements for the amount of energy consumed under the tariff.

In addition, the EV Statute allows utilities to “seek recovery of costs reasonably necessary to comply with this section, including costs to inform and educate customers about the financial, energy conservation, and environmental benefits of electric vehicles and to publicly advertise and promote participation in the customer-optional tariff.”

The Department offers comments on the following issues identified by the Commission.

### A. *DESIGNATED ON- AND OFF-PEAK HOURS*

The Commission sought comment on whether the hours designated as on- and off-peak should be the same for all utilities. In its March 12, 2015 comments, the Minnesota Center for Environmental Advocacy (MCEA) recommended that Xcel and Minnesota Power harmonize their EV tariff offerings to establish consistent hours of off-peak availability including weekend days and holidays within the off-peak rate. MCEA indicated that it does not include OTP or IPL in its recommendation because their service territory is largely rural, and expects low penetration rates for electric vehicles.

The Department notes that each utility has its own load characteristic, and may not share the same peak periods in its demand. In particular, MP with its high concentration of large industrial customers has different load characteristics than the other utilities. In addition, the purpose of the EV tariff is to permit vehicle charging by residential customers, presumably at their home, and not for publicly available vehicle charging stations, thereby diminishing the need for consistent off-peak periods across utilities to limit customer confusion. Consequently, the Department concludes that uniformity in the on- and off-peak periods is not necessary.

## *B. RENEWABLE RATES*

All four of the utilities subject to the EV Statute proposed to utilize their existing green pricing program for the purchase of renewable energy under the EV tariff. Customers purchasing power through the green pricing program typically purchase energy in 100 kWh blocks at a set price, and in turn receive a credit to their fuel clause adjustment for reduced fuel costs.

In comments filed March 12, 2015, MCEA recommended that the all-renewable option be the default rate, and that customers desiring service using the utility's existing mix of generation resources be required to affirmatively choose that option. In addition, MCEA recommended that the rates for EV tariff offerings be developed from pricing for more recent renewable projects in order to reflect decreasing costs of wind rather than using rates under the existing green pricing programs.

The Department does not object to using the all-renewable option as the default rate as long as customers are made fully aware that the rate includes green pricing. As a practical matter, the Department expects that initial purchasers of electric vehicles may include a sizeable number of customers choosing the vehicle for its environmentally friendly aspects and consequently, support the all-renewable option.

Using existing green pricing programs is administratively simple, and would ensure rate consistency with other customers purchasing renewable energy through the green pricing program. The Commission has specifically allowed Xcel to purchase renewable energy credits (RECs) as a means of moderating its WindSource green pricing rates. Finally, energy generated for green pricing programs has not been permitted to count towards RES compliance; and consequently, keeping green pricing separate from renewables purchased for RES compliance will ensure double counting of RECs for green pricing and RES compliance will not occur.

## *C. REPORTING REQUIREMENTS*

Minn. Stat. §216B.1614, Subd. 3 requires periodic reporting on customer participation in the EV tariffs. Specifically, the statute requires that utilities report on the following information, organized on a per-quarter basis:

1. The number of customers who have arranged to purchase electricity under the tariff;
2. The total amount of electricity sold under the tariff; and
3. Other data required by the Commission.

The Commission's Notice sought comment on what, if any, additional reporting requirements should be required of utilities with EV tariffs.

As discussed below, two of the proposed tariffs offer customers off-peak usage for EV charging, while two of the proposed tariffs offer time-of-use options. In the off-peak tariffs, electricity is only available for recharging during the off-peak hours, while the time-of-use

tariffs would permit a customer to charge during on-peak hours if the customer was willing to pay the on-peak rate. The Department recommends that the amount of electricity sold under the tariff be reported for on-peak and off-peak periods if applicable. In addition, the Department recommends that the utilities provide a brief description of all development and promotional activities and their costs.

### **III. REVIEW OF UTILITY PROPOSED TARIFFS**

#### **A. XCEL ENERGY**

Xcel proposed to offer a time-of-day Electric Vehicle Service Tariff to its residential customers. Under the EV tariff, the off-peak period is defined as 9 pm to 9 am Monday through Friday, weekends and designated holidays. Rates during off-peak hours are \$0.033 per kWh. Peak period rates (9 am – 9 pm Monday through Friday) are \$0.17564 from June through September, and \$0.14170 for the remaining months of the year. Xcel included information on the ratio of on- to off-peak energy charges. Xcel proposed a \$4.95 monthly customer charge. Xcel indicated its proposed EV Tariff customer charge is the same as its existing Energy Controlled Service (Non-Demand Metered) tariff, and Limited Off Peak Service, both of which have the same incremental metering and billing cost requirements and have been approved by the Commission. EV customers may choose to obtain renewable energy through Xcel's green pricing program, the WindSource Rider. The Department has reviewed Xcel's proposed rates and recommends approval.

Xcel requested approval to defer the costs of informing and promoting its EV tariff to customers in a separate tracker account. Xcel's approach recognizes the uncertainty in the size and usage of the EV market. Xcel indicated it will petition the Commission for recovery of qualifying costs in a future proceeding. The Company also expressed concern that cost recovery specific to the EV tariff may not be appropriate because EV charging could also occur under its existing Residential Service and Residential Time-of-Day tariffs.

The Department recommends approval of Xcel's proposed EV tariff. The Department also supports Xcel's request to establish a tracker account for the purpose of deferring recovery of its promotional costs associated with the EV tariff. Establishing a tracker would permit the collection of additional information regarding the growth in the EV market before establishing a recovery mechanism. Any concerns Xcel has with the specific mechanism for cost recovery of EV promotional activities can be addressed at the time the Company petitions for recovery.

#### **B. MINNESOTA POWER**

Minnesota Power proposed to offer a Residential Off-Peak Electric Vehicle Service tariff modelled after its Residential Controlled Access Electric Service tariff. Service under the EV tariff would be available solely between the hours of 11 pm and 7 am daily at the off-peak rate of \$0.04332 per kWh, and a monthly customer charge of \$4.25. In response to a

Department information request,<sup>1</sup> MP indicated the customer charge was set to cover metering costs, and reflects the Company's attempt to balance the cost of providing service and keeping the EV rate attractive for the limited amount of usage necessary to recharge an electric vehicle. The proposed energy charge is consistent with the existing Residential Controlled Access tariff.

MP proposed to offer customers the option of obtaining renewable energy for EV recharging under its existing Rider for Residential/General Service Renewable Energy green pricing tariff. MP indicated that it is not anticipating developing a specific advertising campaign for its EV tariff, and therefore is not requesting cost recovery for promotional activities at this time. In the event more extensive promotional activities occur, MP stated that it may request cost recovery in the future.

The Department has reviewed MP's proposed tariff and recommends approval.

### *C. OTTER TAIL POWER*

OTP proposed to offer an Off-Peak EV Rider modelled after its existing Fixed Time-of-Service Rider (TOS Rider). The Off-Peak EV Rider would be available to all customer classes. Service through the Rider will only be available during the off-peak hours of 10 pm to 6 am daily. OTP indicated that service is not available during the remaining times. In the event usage occurs during an unauthorized time period, the Company would impose a penalty rate that is charged in addition to the regular rate.

Hours of service availability and customer charges under the EV Rider mirror the existing TOS Rider. Proposed EV Rider energy charges are based on the TOS Rider with the addition of the estimated incremental costs necessary to develop and promote the new EV Rider. To estimate the incremental promotional costs, OTP estimated that 100 vehicles will take service under the EV Rider with annual mileage of 15,000 miles at 34 kWh per 100 miles resulting in total energy sales of 1,285 MWhs over a five-year period. Assuming an estimated \$17,171 in total development and promotional costs over the same five-year period results in an increase in the tariffed rate of \$0.01336 per kWh ( $\$17,171/1,285$ ). In addition, OTP proposed to offer a renewable energy option through its TailWinds green pricing program.

The Department recommends that OTP be directed to establish a tracker account for its EV development and promotional costs rather than including these costs in its EV Rider rate at this point in time. Given the lack of market penetration by electric vehicles, and the generally rural nature of OTP's service territory, use of a tracker will allow the Company additional information on the extent of customer participation and usage under the EV Rider. The Department recommends that the inclusion of development and promotional costs be revisited after a year's experience with the EV Rider.

---

<sup>1</sup> Department Information Request No. 1 is included in these comments as Attachment 1.

The Department recommends approval of OTP’s proposed Off-Peak EV Rider with rates modified to remove the \$0.01336 per kWh estimated cost for development and promotional activities. The Department recommends OTP be directed to establish a tracker account for EV development and promotional costs for future recovery.

*D. INTERSTATE POWER & LIGHT*

Interstate Power & Light (IPL) proposed to offer a time-of-use tariff for electric vehicle charging, the Optional Residential Electric Vehicle Recharging Rider (EV Rider). IPL currently has its electric asset sale to Southern Minnesota Energy Cooperative (SMEC) pending before the Commission in Docket No. E001/PA-14-322. Under the proposed terms of the sale, SMEC will adopt the rates in effect at the close of the sale for the first three years following the sale. If the Commission approves the proposed sale prior to the EV Rider becoming effective, SMEC has the discretion to determine whether to proceed with the EV Rider offering.

IPL’s proposed Optional Residential Electric Vehicle Recharging Tariff mirrors the on-peak and off-peak service timeframes and rates of its Optional Residential Time-of-Use tariff. The rates for both tariffs are:

Customer Charge (per month)	\$11.85
Energy Charge (per kWh)	
June - September:	
On-peak	\$0.13856
Off-peak	\$0.03784
October - May	
On-peak	\$0.09565
Off-peak	\$0.07334

IPL’s proposed customer charge is higher than the customer charges proposed by the other three utilities subject to the EV Statute. The Department notes that the rates reflect the outcome of IPL’s most recent rate case (Docket No. E001/GR-10-276) which set an \$11.85 customer charge for the Residential Time-of-Use tariff, below the \$19.47 per month customer cost identified in the Company’s class cost of service study (CCOSS). In response to Department Information Request No. 1,<sup>2</sup> IPL indicated that its customer-related costs include \$2.02 per month in metering costs. In response to Department Information Request No. 2, IPL stated that customer’s choosing to have sub-metering would be billed a separate monthly excess facilities charge.<sup>3</sup> A separate charge for sub-metering appears to violate Minn Stat. §216B.1614, Subd. 2(c)(4) which requires the cost of metering or submetering to be incorporated within the rate charged to the customer.

The Department remains concerned that IPL’s proposed customer charge reflects more than the incremental costs associated with service an EV customer. The Department acknowledges serving an EV customer would include additional metering and possible billing

<sup>2</sup> Department IR #1 is included in these comments in Attachment 1.

<sup>3</sup> Department IR #2 is included in these comments in Attachment 1.

costs, but remains unclear about the extent to which an EV customer would incur additional primary and secondary distribution costs that would not already be recovered through the customer charge for standard residential service. Customers with standard residential service who add service under the EV tariff would be paying two customer charges, and possibly an additional excess facilities charge for sub-metering.

The Department recommends that IPL provide additional information in reply comments on the incremental customer cost of serving an EV customer.

#### **IV. SUMMARY OF DEPARTMENT RECOMMENDATIONS**

The Department requests that Interstate Power and Light provide additional information in reply on the incremental customer costs of serving an EV customer.

The Department recommends the Commission

- Approve Xcel Energy's Electric Vehicle Service Tariff, and approve Xcel's request to establish a tracker account for tracking the development and promotional costs associated with the EV tariff.
- Approve Minnesota Power's Residential Off-Peak Electric Vehicle Service tariff.
- Approve Otter Tail Power Company's proposed Off-Peak Electric Vehicle Rider with rates modified to remove the \$0.01336 per kWh estimated cost for development and promotional activities. Direct Otter Tail to establish a tracker account for tracking the development and promotional costs associated with the EV tariff.
- Direct the utilities to submit an annual compliance report detailing the number of customers taking service under the electric vehicle tariff, energy usage under the tariff broken down by on- and off-peak periods, if applicable, and a description and accounting of development and promotional costs.

/lt



# Attachment 1

**State of Minnesota**  
**DEPARTMENT OF COMMERCE**  
**DIVISION OF ENERGY RESOURCES**

**Utility Information Request**

Docket Number: E015/M-15-120

Date of Request: February 24, 2015

Requested From: Marcia Podratz  
Minnesota Power

Response Due: March 6, 2015

Analyst Requesting Information: Susan L. Peirce

Type of Inquiry:    ..... Financial                    ..... Rate of Return            ..... Rate Design  
                         ..... Engineering                    ..... Forecasting                ..... Conservation  
                         ..... Cost of Service                    ..... CIP                            ..... Other:

*If you feel your responses are trade secret or privileged, please indicate this on your response.*

Request No.	
1	According to the Company, the proposed electric vehicle charging tariff is modeled on the Residential controlled access Electric Service tariff. Please explain any cost basis for the difference in the monthly customer charges for these two tariffs. Include any differences in metering costs.

**Response:**

The proposed monthly service charge of \$4.25 is based on analysis of the components of residential monthly customer costs completed during the Company's 2009 rate case.<sup>1</sup> The Electric Vehicle (EV) tariff proposed by Minnesota Power will require a separate meter, as it is energy that must be measured and billed at a separate rate from the other applicable tariff for a given customer. Minnesota Power's tariffs and service regulations do not provide for sub-metering or subtractive metering. In its 2009 rate case, Minnesota Power calculated the total fixed monthly cost of serving a residential customer to be \$23.25. Of this, \$4.24 is attributed to meter costs. The remainder of the \$23.25 includes primary and secondary distribution system and customer service costs, which theoretically should be recovered through the existing monthly service charge for standard residential service. Based on the Commission decision in the rate case, the Residential Controlled Access rate was allowed an \$8.00 monthly service charge to match the standard residential rate monthly service charge. For the EV tariff, Minnesota Power attempted to strike a balance between recovering the cost of providing service and keeping the EV rate

<sup>1</sup> MPUC Docket No. E015/GR-09-1151, as shown in Attachment D in the Company's initial filing in MPUC Docket No. E015/M-15-120

Response by: Andrew Hall  
Title: Cost and Pricing Analyst II  
Department: Rate Department  
Telephone: 218-355-3100

List sources of information:  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

attractive for the limited amount of usage expected for the sole purpose of EV charging. Although there is no difference in metering costs, because typical customer usage on the EV tariff will likely be less than usage on the Residential Controlled Access Electric Service tariff, there will be less energy charge savings to offset the additional monthly service charge. Setting the monthly service charge at the rounded value of \$4.25 keeps the Company in line with other Minnesota utilities' proposals, allows for the recovery of costs related to metering or sub-metering as required by Minn. Stat § 216B.1614, subd. 2(c)(4), and serves as an incentive for customers to adopt the EV tariff over the standard residential rate or Controlled Access Electric Service tariff.

---

Response by: Andrew Hall  
Title: Cost and Pricing Analyst II  
Department: Rate Department  
Telephone: 218-355-3100

List sources of information:  
\_\_\_\_\_  
\_\_\_\_\_

**Response of  
Interstate Power and Light Company  
to  
Minnesota Department of Commerce,  
Division of Energy Resources  
Information Request No. 1**

Docket Number: E001/M-15-200  
Date of Request: March 19, 2015  
Response Due: March 30, 2015  
Information Requested By: Susan Pierce  
Date Responded: March 30, 2015  
Author: Dave Vogensen  
Author's Title: Lead Regulatory Affairs Cnslt.  
Author's Telephone No.: (319) 786-4679  
Subject:  
Reference:

---

**Information Request No. 1**

Please provide cost support for the proposed customer charge of \$11.85. Identify any metering costs included in the customer charge.

**Response**

The proposed customer charge is identical to the customer charge of \$11.85 approved by the Minnesota Public Utilities Commission (Commission) for IPL's Residential Time-of-Use rate as found on Tariff Sheet No. 6, attached for reference as Attachment A to this information request response. This Residential Time-of-Use customer charge was approved by the Commission in Docket No. E001/GR-10-276.

Additionally, the class cost of service study provided by IPL in that rate case docket supported a customer charge of \$19.47 (please see Attachment B, which is Volume III, Exhibit\_\_RJA-1, Exhibit E-3(B) from that proceeding). Specifically, \$835,000 of meter expenses were allocated to residential class as customer related expenses in support of that charge, which equated to \$2.02 per month. Although the cost study supported a higher customer charge, the Commission approved a lower customer charge. The metering costs reflected in the class cost of service study provides an indicative level of metering costs embedded within the proposed customer charge for IPL's Electric Vehicle Recharging tariff.

INTERSTATE POWER and LIGHT COMPANY  
ELECTRIC TARIFF  
FILED WITH M.P.U.C.

ORIGINAL VOLUME NO. 8  
FOURTEENTH REVISED SHEET NO. 6  
Canceling THIRTEENTH REVISED SHEET NO. 6

---

RATE DESIGNATION:		ON - PEAK 167
CLASS OF SERVICE:	OPTIONAL RESIDENTIAL TIME OF USE	OFF - PEAK 168
SERVICE AREA:	ALL MINNESOTA SERVICE AREA	

---

Availability: Applicable for single phase service to an individual customer residing in a single occupancy residence or apartment for full domestic use.

Net Rate:

Basic Service: \$0.38959 per day\*

<u>kWh Charge:</u>	<u>Usage from June 1 through Sept. 30</u>	<u>Usage from Oct. 1 through May 31</u>
On-Peak Energy	All kWh/day @ 13.856¢ per kWh	All kWh/day @ 9.565¢ per kWh
Off-Peak Energy	All kWh/day @ 3.784¢ per kWh	All kWh/day @ 7.334¢ per kWh

\* For Comparison Only: Basic Service \$11.85/month.

Definition of Peak Periods: On-Peak: 7 AM - 8 PM CST (8 AM – 9 PM Daylight Savings Time) all weekdays.  
Off-Peak: All other hours (including weekends).

Energy Supply Cost Adjustment: Rider 1M applicable hereto.

Resource Adjustment Charge: Rider RAC applicable hereto.

Conservation Improvement Program Cost Recovery Adjustment: Rider 1C applicable hereto.

Renewable Energy Recovery Adjustment: Rider RER applicable hereto.

Excess Facilities Charge: Any facilities required to provide service in excess of that permitted under this Schedule or the Company's Electric Service Standards shall be provided at a monthly amount equal to 1.6% of the Company's investment in such facilities.

Tax Adjustment: Rider MTX applicable hereto.

Late Payment: A late payment charge of one and one-half percent per month shall be assessed on delinquent amounts in excess of \$10.00. The minimum late payment charge assessed shall be \$1.00. A bill becomes delinquent if payment is not credited by the next billing date.

Rules and Regulations: Service hereunder is subject to the provisions of the Company's Electric Service Standards.

---

Date Filed: December 8, 2011

Effective Date: July 6, 2014

By: Erik C. Madsen – Director, Regulatory Affairs

Docket No. E001/GR-10-276

Order Date: February 13, 2012

Response to Department IR No. 1  
Attachment B  
Page 2 of 4

Exhibit (RJA-1)  
Schedule E-3 (B)  
Page 2 of 4

INTERSTATE POWER AND LIGHT  
CLASS COST OF SERVICE STUDY  
TWELVE MONTHS ENDING DECEMBER 31, 2009 AS ADJUSTED  
CCS Summary Schedules for Consolidated Rate Classes at Present and Proposed Rates

Line No.	Description (A)	System Total (B)	Residential (C)	General Service (D)	Large Power and Lighting (E)	Lighting (F)	Resale (G)
		System Total	General Service	General Service	Large Power and Lighting	Lighting	Resale
<b>Functional Rate Base</b>							
<b>Production</b>							
	Demand	\$ 90,738,792	\$ 34,182,781	\$ 22,058,348	\$ 34,430,806	\$ -	\$ 66,757
	Customer	-	-	-	-	-	-
	Energy	\$ 5,138,941	\$ 1,751,273	\$ 1,244,654	\$ 2,089,367	\$ 48,962	\$ 4,685
	Sub-total	\$ 95,877,734	\$ 35,934,054	\$ 23,303,003	\$ 36,520,273	\$ 48,962	\$ 71,442
<b>Transmission</b>							
	Demand	\$ (9,216)	\$ (3,362)	\$ (2,345)	\$ (3,501)	\$ -	\$ (8)
	Customer	-	-	-	-	-	-
	Energy	-	-	-	-	-	-
	Sub-total	\$ (9,216)	\$ (3,362)	\$ (2,345)	\$ (3,501)	\$ -	\$ (8)
<b>Distribution</b>							
	Demand	-	-	-	-	-	-
	Customer	\$ (2,514)	\$ (989)	\$ (638)	\$ (843)	\$ (42)	\$ (2)
	Energy	-	-	-	-	-	-
	Sub-total	\$ (2,514)	\$ (989)	\$ (638)	\$ (843)	\$ (42)	\$ (2)
<b>Distribution Primary</b>							
	Demand	\$ 33,577,056	\$ 13,168,165	\$ 8,913,012	\$ 11,142,050	\$ 324,702	\$ 29,127
	Customer	-	-	-	-	-	-
	Energy	-	-	-	-	-	-
	Sub-total	\$ 33,577,056	\$ 13,168,165	\$ 8,913,012	\$ 11,142,050	\$ 324,702	\$ 29,127
<b>Distribution Secondary</b>							
	Demand	-	-	-	-	-	-
	Customer	\$ 17,600,864	\$ 7,924,956	\$ 5,502,422	\$ 2,205,349	\$ 1,961,785	\$ 6,352
	Energy	-	-	-	-	-	-
	Sub-total	\$ 17,600,864	\$ 7,924,956	\$ 5,502,422	\$ 2,205,349	\$ 1,961,785	\$ 6,352
<b>Customer Service</b>							
	Demand	-	-	-	-	-	-
	Customer	\$ 1,732,620	\$ 1,318,918	\$ 400,195	\$ 11,699	\$ 1,793	\$ 16
	Energy	-	-	-	-	-	-
	Sub-total	\$ 1,732,620	\$ 1,318,918	\$ 400,195	\$ 11,699	\$ 1,793	\$ 16
<b>TOTAL</b>							
	Demand	\$ 124,308,632	\$ 47,347,584	\$ 30,969,015	\$ 46,569,455	\$ 324,702	\$ 95,877
	Customer	\$ 19,330,970	\$ 9,242,884	\$ 5,901,978	\$ 2,216,205	\$ 1,963,536	\$ 6,367
	Energy	\$ 5,138,941	\$ 1,751,273	\$ 1,244,654	\$ 2,089,367	\$ 48,962	\$ 4,685
	<b>TOTAL RATE BASE</b>	\$ 148,776,544	\$ 58,341,741	\$ 38,115,648	\$ 49,875,027	\$ 2,337,199	\$ 106,929

INTERSTATE POWER AND LIGHT  
CLASS COST OF SERVICE STUDY  
TWELVE MONTHS ENDING DECEMBER 31, 2009 AS ADJUSTED  
CCS Summary Schedules for Consolidated Rate Classes at Present and Proposed Rates

Line No.	Description (A)	System Total (B)	Residential (C)	General Service (D)	Large Power and Lighting (E)	Lighting (F)	Resale (G)
1	Rate Base						
2	Plant in Service	\$ 251,929,859	\$ 102,013,635	\$ 65,384,436	\$ 78,297,042	\$ 6,050,898	\$ 183,849
3	Accumulated Reserve	(123,195,942)	(50,068,992)	(31,980,548)	(36,584,734)	(2,869,218)	(92,450)
4	Other Rate Base Items	20,042,627	6,397,098	4,311,760	10,162,719	(844,480)	15,530
	Total Rate Base	\$ 148,776,544	\$ 58,341,741	\$ 38,115,648	\$ 49,875,027	\$ 2,337,199	\$ 106,929
5	Revenues at Current Rates						
6	Total Revenue From Sales	\$ 72,519,096	\$ 28,534,924	\$ 18,413,406	\$ 24,306,252	\$ 1,220,807	\$ 43,707
7	Other Revenue	2,460,175	970,255	628,611	817,807	44,004	1,498
	Total Revenues	\$ 74,979,271	\$ 29,505,179	\$ 19,040,017	\$ 25,124,059	\$ 1,264,811	\$ 45,205
8	Expenses at Current Rates						
9	Operations & Maintenance Expenses	59,557,647	24,095,170	14,497,060	20,593,840	326,051	45,525
10	Depreciation Expense	8,762,228	3,458,537	2,221,349	2,823,341	252,713	6,288
11	Amortization Expense	3,699,498	1,390,267	896,778	1,413,607	(3,875)	2,721
12	Taxes Other Than Income Taxes	2,942,349	1,215,232	757,013	911,809	56,218	2,077
13	Income Tax - Calculated	(2,691,134)	(953,157)	(420,703)	(901,439)	(399,213)	(16,622)
14	After-Tax Adjustment	(355,940)	(147,114)	(96,349)	(97,341)	(14,870)	(266)
	Total Expenses - Current	\$ 71,914,648	\$ 29,058,934	\$ 17,855,149	\$ 24,743,818	\$ 217,024	\$ 39,723
15	Current Operating Income	3,064,623	446,245	1,184,868	380,241	1,047,787	5,483
16	Return at Current Rates	2.060%	0.76%	3.11%	0.76%	44.83%	5.13%
17	Revenue Requirement at Equal Rates of Return						
18	Required Return	8.01%	8.01%	8.01%	8.01%	8.01%	8.01%
19	Required Operating Income	\$ 11,921,464	\$ 4,674,924	\$ 3,054,207	\$ 3,996,486	\$ 187,280	\$ 8,568
	Operating Income (Deficiency)/Surplus	\$ (8,856,841)	\$ (4,223,679)	\$ (1,869,339)	\$ (3,616,245)	\$ 860,507	\$ (3,086)
20	Expenses at Required Return						
21	Operations & Maintenance Expenses	59,557,647	24,095,170	14,497,060	20,593,840	326,051	45,525
22	Depreciation Expense	8,762,228	3,458,537	2,221,349	2,823,341	252,713	6,288
23	Amortization Expense	3,699,498	1,390,267	896,778	1,413,607	(3,875)	2,721
24	Taxes Other Than Income	2,942,349	1,215,232	757,013	911,809	56,218	2,077
25	Income Taxes	3,568,352	1,395,364	911,628	1,192,882	55,900	2,557
26	After-Tax Adjustment	(355,940)	(147,114)	(96,349)	(97,341)	(14,870)	(266)
	Total Expense - Required	\$ 78,164,133	\$ 31,407,475	\$ 19,187,480	\$ 26,838,139	\$ 672,137	\$ 58,902
27	Total Revenue Requirement at Equal Return	\$ 90,085,598	\$ 36,082,399	\$ 22,241,687	\$ 30,834,625	\$ 859,417	\$ 67,470
28	Revenue (Deficiency)/Surplus	\$ (15,105,927)	\$ (6,577,220)	\$ (3,201,670)	\$ (5,710,567)	\$ 405,394	\$ (22,265)

Response to Department IR No. 1  
Attachment B  
Page 3 of 4

Exhibit (RJA-1)  
Schedule E-3 (B)  
Page 3 of 4

INTERSTATE POWER AND LIGHT  
CLASS COST OF SERVICE STUDY  
TWELVE MONTHS ENDING DECEMBER 31, 2009 AS ADJUSTED  
CCS Summary Schedules for Consolidated Rate Classes at Present and Proposed Rates

Line No.	Description (A)	System Total (B)	Residential (C)	General Service (D)	Large Power and Lighting (E)	Lighting (F)	Resale (G)
		System Total	Residential	General Service	Large Power and Lighting	Lighting	Resale
<b>Production</b>							
	Demand	\$ 30,899,307	\$ 11,640,272	\$ 7,511,536	\$ 11,724,767	\$ -	\$ -
	Customer	-	-	-	-	-	22,733
	Energy	\$ 27,019,481	\$ 9,207,826	\$ 6,544,133	\$ 10,985,456	\$ 257,431	\$ 24,635
	Sub-total	\$ 57,918,788	\$ 20,848,098	\$ 14,055,669	\$ 22,710,222	\$ 257,431	\$ 47,367
<b>Transmission</b>							
	Demand	\$ 12,088,206	\$ 4,409,695	\$ 3,075,777	\$ 4,592,611	\$ -	\$ -
	Customer	-	-	-	-	-	10,123
	Energy	-	-	-	-	-	-
	Sub-total	\$ 12,088,206	\$ 4,409,695	\$ 3,075,777	\$ 4,592,611	\$ -	\$ 10,123
<b>Distribution</b>							
	Demand	-	-	-	-	-	-
	Customer	\$ 364,888	\$ 143,577	\$ 92,649	\$ 122,300	\$ 6,143	\$ 220
	Energy	-	-	-	-	-	-
	Sub-total	\$ 364,888	\$ 143,577	\$ 92,649	\$ 122,300	\$ 6,143	\$ 220
<b>Distribution Primary</b>							
	Demand	\$ 9,113,935	\$ 3,574,280	\$ 2,419,289	\$ 3,024,325	\$ 88,135	\$ 7,906
	Customer	-	-	-	-	-	-
	Energy	-	-	-	-	-	-
	Sub-total	\$ 9,113,935	\$ 3,574,280	\$ 2,419,289	\$ 3,024,325	\$ 88,135	\$ 7,906
<b>Distribution Secondary</b>							
	Demand	-	-	-	-	-	-
	Customer	\$ 5,635,521	\$ 2,513,958	\$ 1,724,753	\$ 874,160	\$ 520,178	\$ 2,461
	Energy	-	-	-	-	-	-
	Sub-total	\$ 5,635,521	\$ 2,513,958	\$ 1,724,753	\$ 874,160	\$ 520,178	\$ 2,461
<b>Customer Service</b>							
	Demand	-	-	-	-	-	-
	Customer	\$ 6,557,199	\$ 5,217,452	\$ 1,281,641	\$ 45,015	\$ 12,554	\$ 537
	Energy	-	-	-	-	-	-
	Sub-total	\$ 6,557,199	\$ 5,217,452	\$ 1,281,641	\$ 45,015	\$ 12,554	\$ 537
<b>TOTAL</b>							
	Demand	\$ 50,770,507	\$ 19,117,300	\$ 12,675,020	\$ 18,853,794	\$ 84,658	\$ 39,735
	Customer	\$ 12,360,633	\$ 7,776,023	\$ 3,035,861	\$ 1,017,746	\$ 517,851	\$ 3,150
	Energy	\$ 26,964,458	\$ 9,189,076	\$ 6,530,806	\$ 10,963,085	\$ 256,907	\$ 24,584
	<b>Total Revenue Requirement</b>	\$ 90,095,598	\$ 36,082,399	\$ 22,241,687	\$ 30,834,625	\$ 859,417	\$ 67,470

Response to Department IR No. 1  
Attachment B  
Page 4 of 4

Exhibit (RJA-1)  
Schedule E-3 (B)  
Page 4 of 4

INTERSTATE POWER AND LIGHT  
CLASS COST OF SERVICE STUDY  
TWELVE MONTHS ENDING DECEMBER 31, 2009 AS ADJUSTED  
CCS Summary Schedules for Consolidated Rate Classes at Present and Proposed Rates

Line No.	Description (A)	System Total (B)	Residential (C)	General Service (D)	Large Power and Lighting (E)	Lighting (F)	Resale (G)
<b>Unit Costs</b>							
	Production						
	Demand	\$ 215.8077	\$ 215.8077	\$ 215.8077	\$ 215.8077	\$ -	\$ 215.8077
	Customer	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
	Energy	\$ 0.0321	\$ 0.0321	\$ 0.0322	\$ 0.0322	\$ 0.0320	\$ 0.0326
	Transmission						
	Demand	\$ 84.4268	\$ 81.7546	\$ 88.3676	\$ 84.5323	\$ -	\$ 96.0981
	Customer	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
	Energy	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
	Distribution						
	Demand	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
	Customer	\$ 0.7067	\$ 0.6960	\$ 1.8655	\$ 78.7253	\$ -	\$ 36.6529
	Energy	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
	Distribution Primary						
	Demand	\$ 63.6538	\$ 66.2663	\$ 69.5066	\$ 55.6662	\$ -	\$ 75.0541
	Customer	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
	Energy	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
	Distribution Secondary						
	Demand	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
	Customer	\$ 10.9146	\$ 6.0930	\$ 17.3640	\$ 281.3517	\$ 405.1234	\$ 205.1174
	Energy	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
	Sub-total	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
	Customer Service						
	Demand	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
	Customer	\$ 12.6996	\$ 12.6454	\$ 12.9029	\$ 14.4884	\$ 9.7770	\$ 44.7658
	Energy	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
	Sub-total	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
	TOTAL						
	Demand	\$ 363.8883	\$ 363.8286	\$ 373.6620	\$ 356.0062	\$ -	\$ 386.9600
	Customer	\$ 24.3208	\$ 19.4343	\$ 32.1323	\$ 374.5654	\$ 424.4684	\$ 286.5362
	Energy	\$ 0.0321	\$ 0.0321	\$ 0.0322	\$ 0.0322	\$ 0.0320	\$ 0.0326
	4. Coincident Peak (Avg 07-09)	143,180	53,938	34,807	54,330	0	105
	Customer Count	43,028	34,383	8,278	259	107	1
	Sales at Meter	840,757,858	287,202,448	203,209,408	341,536,830	8,053,692	756,480



**Response of  
Interstate Power and Light Company  
to  
Minnesota Department of Commerce,  
Division of Energy Resources  
Information Request No. 2**

Docket Number: E001/M-15-200  
Date of Request: March 19, 2015  
Response Due: March 30, 2015  
Information Requested By: Susan Pierce  
Date Responded: March 30, 2015  
Author: Dave Vogensen  
Author's Title: Lead Regulatory Affairs Cnslt.  
Author's Telephone No.: (319) 786-4679  
Subject:  
Reference:

---

**Information Request No. 2**

According to the Company's proposal sub-metering is available for customers electing the EV Rider. Will the use of sub-metering effect the customer charge? If so, please explain.

**Response**

Yes, the cost of the additional metering would be based upon the installed cost of the sub-metering and would be billed to the customer as a monthly excess facilities charge. The excess facilities charge is billed on a monthly basis as 1.6% of IPL's investment cost.

## 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. E002/M-15-111; E017/M-15-112; E015/M-15-120; and  
E001/M-15-200**

Dated this 13<sup>th</sup> day of April 2015

**/s/Sharon Ferguson**

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Christopher	Anderson	canderson@allete.com	Minnesota Power	30 W Superior St  Duluth, MN 558022191	Electronic Service	No	OFF_SL_15-111_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	No	OFF_SL_15-111_Official
Alison C	Archer	alison.c.archer@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 5  Minneapolis, MN 55401	Electronic Service	No	OFF_SL_15-111_Official
James J.	Bertrand	james.bertrand@leonard.com	Leonard Street & Deinard	150 South Fifth Street, Suite 2300  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_15-111_Official
Michael	Bradley	mike.bradley@lawmoss.com	Moss & Barnett	150 S. 5th Street, #1200  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_15-111_Official
Jeffrey A.	Daugherty	jeffrey.daugherty@centerpointenergy.com	CenterPoint Energy	800 LaSalle Ave  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_15-111_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_15-111_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_15-111_Official
Michael	Hoppe	il23@mtn.org	Local Union 23, I.B.E.W.	932 Payne Avenue  St. Paul, MN 55130	Electronic Service	No	OFF_SL_15-111_Official
Tiffany	Hughes	Regulatory.Records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7  Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_15-111_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Alan	Jenkins	aj@jenkinsatlaw.com	Jenkins at Law	2265 Roswell Road Suite 100 Marietta, GA 30062	Electronic Service	No	OFF_SL_15-111_Official
Richard	Johnson	Rick.Johnson@lawmoss.com	Moss & Barnett	150 S. 5th Street Suite 1200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_15-111_Official
Mark J.	Kaufman	mkaufman@ibewlocal949.org	IBEW Local Union 949	12908 Nicollet Avenue South  Burnsville, MN 55337	Electronic Service	No	OFF_SL_15-111_Official
Thomas G.	Koehler	TGK@IBEW160.org	Local Union #160, IBEW	2909 Anthony Ln  St Anthony Village, MN 55418-3238	Electronic Service	No	OFF_SL_15-111_Official
Michael	Krikava	mkrikava@briggs.com	Briggs And Morgan, P.A.	2200 IDS Center 80 S 8th St Minneapolis, MN 55402	Electronic Service	No	OFF_SL_15-111_Official
Douglas	Larson	dlarson@dakotaelectric.com	Dakota Electric Association	4300 220th St W  Farmington, MN 55024	Electronic Service	No	OFF_SL_15-111_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	No	OFF_SL_15-111_Official
Pam	Marshall	pam@energycents.org	Energy CENTS Coalition	823 7th St E  St. Paul, MN 55106	Electronic Service	No	OFF_SL_15-111_Official
Andrew	Moratzka	apmoratzka@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_15-111_Official
David W.	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency	Suite 300 200 South Sixth Street Minneapolis, MN 55402	Electronic Service	No	OFF_SL_15-111_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Richard	Savelkoul	rsavelkoul@martinsquires.com	Martin & Squires, P.A.	332 Minnesota Street Ste W2750  St. Paul, MN 55101	Electronic Service	No	OFF_SL_15-111_Official
Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.	76 W Kellogg Blvd  St. Paul, MN 55102	Electronic Service	No	OFF_SL_15-111_Official
Ron	Spangler, Jr.	rlspangler@otpc.com	Otter Tail Power Company	215 So. Cascade St. PO Box 496 Fergus Falls, MN 565380496	Electronic Service	No	OFF_SL_15-111_Official
Byron E.	Starns	byron.starns@leonard.com	Leonard Street and Deinard	150 South 5th Street Suite 2300 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_15-111_Official
James M.	Strommen	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered	470 U.S. Bank Plaza 200 South Sixth Street Minneapolis, MN 55402	Electronic Service	No	OFF_SL_15-111_Official
Eric	Swanson	eswanson@winthrop.com	Winthrop Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_15-111_Official
Lisa	Veith	lisa.veith@ci.stpaul.mn.us	City of St. Paul	400 City Hall and Courthouse 15 West Kellogg Blvd. St. Paul, MN 55102	Electronic Service	No	OFF_SL_15-111_Official
Daniel P	Wolf	dan.wolf@state.mn.us	Public Utilities Commission	121 7th Place East Suite 350 St. Paul, MN 551012147	Electronic Service	No	OFF_SL_15-111_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Christopher	Anderson	canderson@allete.com	Minnesota Power	30 W Superior St  Duluth, MN 558022191	Electronic Service	No	OFF_SL_15-112_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	No	OFF_SL_15-112_Official
Michael	Bradley	mike.bradley@lawmoss.com	Moss & Barnett	150 S. 5th Street, #1200  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_15-112_Official
Ray	Choquette	rchoquette@agp.com	Ag Processing Inc.	12700 West Dodge Road PO Box 2047 Omaha, NE 68103-2047	Electronic Service	No	OFF_SL_15-112_Official
James C.	Erickson	jericksonkbc@gmail.com	Kelly Bay Consulting	17 Quechee St  Superior, WI 54880-4421	Electronic Service	No	OFF_SL_15-112_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_15-112_Official
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_15-112_Official
Shane	Henriksen	shane.henriksen@enbridge.com	Enbridge Energy Company, Inc.	1409 Hammond Ave FL 2  Superior, WI 54880	Electronic Service	No	OFF_SL_15-112_Official
Douglas	Larson	dlarson@dakotaelectric.com	Dakota Electric Association	4300 220th St W  Farmington, MN 55024	Electronic Service	No	OFF_SL_15-112_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_15-112_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	No	OFF_SL_15-112_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Kavita	Maini	kmaini@wi.rr.com	KM Energy Consulting LLC	961 N Lost Woods Rd Oconomowoc, WI 53066	Electronic Service	No	OFF_SL_15-112_Official
Andrew	Moratzka	apmoratzka@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_15-112_Official
Gary	Oetken	goetken@agp.com	Ag Processing, Inc.	12700 West Dodge Road P.O. Box 2047 Omaha, NE 681032047	Electronic Service	No	OFF_SL_15-112_Official
Debra	Opatz	dopatz@otpc.com	Otter Tail Power Company	215 South Cascade Street  Fergus Falls, MN 56537	Electronic Service	No	OFF_SL_15-112_Official
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_15-112_Official
Larry L.	Schedin	Larry@LLSResources.com	LLS Resources, LLC	12 S 6th St Ste 1137  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_15-112_Official
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_15-112_Official
Daniel P	Wolf	dan.wolf@state.mn.us	Public Utilities Commission	121 7th Place East Suite 350 St. Paul, MN 551012147	Electronic Service	No	OFF_SL_15-112_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Christopher	Anderson	canderson@allete.com	Minnesota Power	30 W Superior St  Duluth, MN 558022191	Electronic Service	Yes	OFF_SL_15-120_M-15-120
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_15-120_M-15-120
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_15-120_M-15-120
Margaret	Hodnik	mhodnik@mnpower.com	Minnesota Power	30 West Superior Street  Duluth, MN 55802	Electronic Service	No	OFF_SL_15-120_M-15-120
Lori	Hoyum	lhoyum@mnpower.com	Minnesota Power	30 West Superior Street  Duluth, MN 55802	Electronic Service	No	OFF_SL_15-120_M-15-120
Michael	Krikava	mkrikava@briggs.com	Briggs And Morgan, P.A.	2200 IDS Center 80 S 8th St Minneapolis, MN 55402	Electronic Service	No	OFF_SL_15-120_M-15-120
James D.	Larson	james.larson@avantenergy.com	Avant Energy Services	220 S 6th St Ste 1300  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_15-120_M-15-120
Douglas	Larson	dlarson@dakotaelectric.com	Dakota Electric Association	4300 220th St W  Farmington, MN 55024	Electronic Service	No	OFF_SL_15-120_M-15-120
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_15-120_M-15-120
Susan	Ludwig	sludwig@mnpower.com	Minnesota Power	30 West Superior Street  Duluth, MN 55802	Electronic Service	No	OFF_SL_15-120_M-15-120
Pam	Marshall	pam@energycents.org	Energy CENTS Coalition	823 7th St E  St. Paul, MN 55106	Electronic Service	No	OFF_SL_15-120_M-15-120



First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Herbert	Minke	hminke@allete.com	Minnesota Power	30 W Superior St  Duluth, MN 55802	Electronic Service	No	OFF_SL_15-120_M-15-120
David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St  Duluth, MN 558022093	Electronic Service	No	OFF_SL_15-120_M-15-120
Andrew	Moratzka	apmoratzka@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_15-120_M-15-120
Jennifer	Peterson	jjpeterson@mnpower.com	Minnesota Power	30 West Superior Street  Duluth, MN 55802	Electronic Service	No	OFF_SL_15-120_M-15-120
Marcia	Podratz	mpodratz@mnpower.com	Minnesota Power	30 W Superior S  Duluth, MN 55802	Electronic Service	No	OFF_SL_15-120_M-15-120
Thomas	Scharff	thomas.scharff@newpagecorp.com	New Page Corporation	P.O. Box 8050 610 High Street Wisconsin Rapids, WI 544958050	Electronic Service	No	OFF_SL_15-120_M-15-120
Ron	Spangler, Jr.	rlspangler@otpc.com	Otter Tail Power Company	215 So. Cascade St. PO Box 496 Fergus Falls, MN 565380496	Electronic Service	No	OFF_SL_15-120_M-15-120
Eric	Swanson	eswanson@winthrop.com	Winthrop Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_15-120_M-15-120
Karen	Turnboom	karen.turnboom@newpagecorp.com	NewPage Corporation	100 Central Avenue  Duluth, MN 55807	Electronic Service	No	OFF_SL_15-120_M-15-120
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_15-120_M-15-120

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_15-200_Official
Alison C	Archer	alison.c.archer@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 5  Minneapolis, MN 55401	Electronic Service	No	OFF_SL_15-200_Official
William	Black	bblack@mmua.org	MMUA	Suite 400 3025 Harbor Lane North Plymouth, MN 554475142	Electronic Service	No	OFF_SL_15-200_Official
Ian	Dobson	ian.dobson@ag.state.mn.us	Office of the Attorney General-RUD	Antitrust and Utilities Division 445 Minnesota Street, BRM Tower St. Paul, MN 55101	Electronic Service	No	OFF_SL_15-200_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_15-200_Official
Douglas	Larson	dlarson@dakotaelectric.com	Dakota Electric Association	4300 220th St W  Farmington, MN 55024	Electronic Service	No	OFF_SL_15-200_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_15-200_Official
Andrew	Moratzka	apmoratzka@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_15-200_Official
David W.	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency	Suite 300 200 South Sixth Street Minneapolis, MN 55402	Electronic Service	No	OFF_SL_15-200_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_15-200_Official