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March 31, 2020

Mr. Will Seuffert
Executive Secretary
Minnesota Public Utilities Commission
121 Seventh Place East, Suite 350
St. Paul, MN 55101

VIA ELECTRONIC FILING

Re: In the Matter of a Commission Investigation into Natural Gas Utilities' Practices, Tariffs, and Assignment of Cost Responsibility for Installation of Excess Flow Valves and Other Similar Gas Safety Equipment
Docket No. G011/CI-18-41

Compliance Filing of Minnesota Energy Resources Corporation

Dear Mr. Seuffert:

Minnesota Energy Resources Corporation ("MERC" or the "Company") submits this Compliance Filing in accordance with Order Point 4 of the Minnesota Public Utilities Commission's (the "Commission's") July 31, 2019, Order Accepting Compliance Filings, Requiring MERC to Submit Additional Information, Requiring Annual Compliance Reporting, and Taking Other Action (the "July 31, 2019 Order") in the above-referenced docket. Order Point 4 of the Commission's July 31, 2019 Order required each gas utility to submit an annual compliance report no later than March 31 each year through 2025 listing its progress toward complying with Ordering Paragraphs 7a-c of the Commission's August 20, 2018, Order Finding that Excess Flow Valves Comply with Federal Regulations and Taking Other Actions (the "August 20, 2018 Order").

Order Points 7a-c of the Commission's August 20, 2018 Order required the natural gas utilities to develop and file a plan to identify and hold face-to-face meetings with the decision-makers of specified customers. In particular:

[E]ach gas distribution utility that does not already have EFVs and manual service line shutoff valves on the entirety of its system shall establish a plan to identify and hold face-to-face meetings with the decision-makers of the following customers:

a. Within 120 days of this order, each gas utility must identify and provide a compliance filing that, at a minimum, identifies all the following customers within its service territory that do not already have EFVs (and are eligible under the Federal standards) or manual shutoff valves and are not within an area the utility plans to upgrade by 2025:

- K-12 public districts with school buildings in the utility's service territory;

- K-12 non-public schools with school buildings in the utility's service territory;
- Public and private universities and colleges;
- Hospitals; and
- Multi-unit residential and nursing facilities.

b. Within 120 days of this order, each gas distribution utility is required to establish and file a plan to have face-to-face meetings with the decision-maker of the customers identified above, eligible under the federal standard for EFVs, regarding the purpose of EFV and manual service line shutoff valves, along with the utility's installation policy, and estimated costs

c. The utility may propose in this compliance filing another method for limiting the visits to non-public schools, universities and colleges, and multi-unit residential and nursing facilities based on a size metric. The gas utility may propose as part of the plan a recovery mechanism for the additional requirements of this order which may include deferring costs to a regulatory account to be addressed in its next rate case or through its GUIC or another appropriate rider.

On December 18, 2018, MERC submitted a Compliance Filing identifying customers within the specified groups (i.e., schools, universities, colleges, and multi-unit residential and nursing facilities) and noting that further analysis would be required on a customer-by-customer basis to verify the total installed meter capacity of each service line and to evaluate whether any such installation is already in place or would otherwise be technically feasible based on the specific engineering and operational circumstances for each customer. Specifically, the Company noted that on MERC's system, a single service line often will serve multiple meters in commercial and multifamily applications and in such cases, the total installed meter capacity served by the service line must be evaluated (i.e., whether the total installed meter capacity of all meters falls below the excess flow valve ("EFV") threshold specified within the federal regulations). Further, exemptions to eligibility under the federal regulations require an evaluation and engineering analysis to determine whether an EFV is a viable option based on load diversity, total connected load on the service line, system pressures, service line length, commercial availability, and other factors.

With respect to customer outreach, MERC proposed to initiate contact with customers through the telephone number on file with the account and to contact the customer via mail if the Company cannot reach the customer at the telephone number provided. Once customers are reached by telephone, MERC would request to set up an in-person meeting with someone who has authority over decisions with respect to the facility or customer. The Company proposed to meet with approximately 20 percent of identified customers each year using a third-party contractor to complete the outreach effort within five years.

On August 1, 2019, MERC submitted a supplemental Compliance Filing reporting on the results of the additional analysis addressing which of the customers identified within the specified categories do not already have either an EFV or emergency service line shutoff valve installed, as well as which customers may meet the criteria to qualify for an EFV under current federal standards based on installed meter capacity.¹

Consistent with the Commission's Order, which requires a plan for face-to-face meetings with decision-makers of customers who are eligible under the federal standards for EFVs, MERC identified 3,696 customers within the specified categories who (1) do not currently have an EFV or emergency service line shut off valve installed and (2) qualify for an EFV under current federal standards based on installed meter capacity.²

This Compliance Filing provides an update on MERC's progress toward implementing the customer outreach efforts in accordance with Order Point 7 of the Commission's August 20, 2018 Order.

A. Report on Number of Customers without EFVs or Manual Shut-Off Valves

Ordering Paragraph 7.a. of the Commission's Order required that MERC identify customers within the following categories who do not already have EFVs (and are eligible under the federal standards) or manual shutoff valves and are not within an area that the utility plans to upgrade by 2025:

- K-12 public districts with school buildings in the utility's service territory;
- K-12 non-public schools with school buildings in the utility's service territory;
- Public and private universities and colleges;
- Hospitals; and

¹ The Pipeline Safety, Regulatory Certainty, and Job Creation Act of 2011 mandated that the Pipeline and Hazardous Materials Safety Administration ("PHMSA") require the installation of EFVs on new and replaced lines beyond single-family homes if economically, technically, and operationally feasible. PHMSA again amended 49 C.F.R. § 192.383 in October 2016 following an extensive evaluation of the technological and economic feasibility of expanded EFV applications. Notably, the federal regulations were amended effective April 2017 to add four new categories of service for which EFV installation is required: (1) branched service lines to a single-family residence installed concurrently with the primary single-family residential service line (a single EFV may be installed to protect both lines); (2) branched service lines to a single-family residence installed off a previously-installed single-family residential service line that does not contain an EFV; (3) multifamily installations, including duplexes, triplexes, fourplexes, and other small multifamily buildings (e.g., apartments and condominiums) with known customer loads at the time of service installation based on customer meter capacity up to 1,000 standard cubic feet per hour ("SCFH") per service; and (4) single, small commercial customers served by a single service line with known customer loads at the time of service installation based on meter capacity of up to 1,000 SCFH per service. See 81 Fed. Reg. 70988 (Oct. 14, 2016).

² An additional 534 customers within the identified categories could be eligible to have an emergency service line shut-off valve installed.

- Multi-unit residential and nursing facilities.

As noted above, MERC submitted a Compliance Filing on August 1, 2019, identifying the number of customers within the specified categories that do not already have either an EFV or emergency service line shutoff valve installed, as well as which customers may meet the criteria to qualify for an EFV under current federal standards based on installed meter capacity. A status update on the number of customers who may qualify for an EFV under the federal standards based on installed meter capacity is summarized in Table 1, below. This table reflects the number of service lines rather than the number of premises. MERC notes that many of the identified customer addresses have multiple meters and/or multiple service lines where an EFV or emergency service line shut-off valve would need to be installed on each service line and eligibility would need to be evaluated based on each service line's installed meter capacity.

Table 1. Service Lines Without EFVs or Emergency Service Line Shut-off Valve Installed³

<i>Category</i>	<i>EFV Eligible</i>	<i>Emergency Service Line Shut-off Valve Eligible</i>
K-12 public districts with school buildings in the utility's service territory	245 ⁴	348
K-12 non-public schools with school buildings in the utility's service territory	43 ⁵	18
Public and private universities and colleges	58 ⁶	6
Hospitals	46	57
Multi-unit residential and nursing facilities	3,546	206

³ For purposes of this estimate, MERC assumed that each premise with multiple units or apartments would require only a single EFV or curb valve. Consistent with federal PHMSA regulations, MERC has evaluated eligibility based on known installed meter capacity.

⁴ Twenty-three of the public schools originally identified already have a curb valve installed and thus are excluded. Thirty-five of the originally-identified public schools are no longer eligible due to multiple meters exceeding the federal standard capacity on the service line.

⁵ Two of the non-public K-12 schools have an EFV installed and thus were removed from the list of remaining customers subject to outreach efforts.

⁶ Three customers were determined not to be eligible based on having multiple meters in excess of the federal standard for service lines.

Category	EFV Eligible	Emergency Service Line Shut-off Valve Eligible
TOTAL	3,938	635

MERC has evaluated customer eligibility for possible installation of an EFV based on installed meter capacity. MERC notes that other engineering considerations will also need to be evaluated before each customer qualifies for installation of an EFV. In particular, system pressure, load diversity, service line pressure, and other operational considerations specific to each customer will need to be evaluated to determine technical feasibility.

B. Implementation of Customer Outreach and Face-to-Face Meetings With the Decision-maker of the Customers Identified

Ordering Paragraph 7.b. required each gas utility to establish and file “a plan to have face-to-face meetings with the decision-maker of the customers identified above, eligible under the federal standards for EFVs, regarding the purpose of EFVs and manual service line shutoff valves, along with the utility’s installation policy, and estimated costs.”

In its December 18, 2018, Compliance Filing MERC proposed to initiate contact with customers through the telephone number on file with the account and to contact the customer via mail if it could not reach the customer at the telephone number provided. Once customers are reached by telephone, MERC would request to set up an in-person meeting with someone who has authority over decisions with respect to the facility or customer.

Following the Commission’s July 31, 2019, Order, which approved MERC’s proposed customer outreach compliance plan, MERC evaluated potential third-party contractors to assist with customer outreach efforts. MERC selected EN Engineering to assist with customer outreach efforts and in-person meetings based on EN Engineering’s knowledge of EFV and curb valve requirements and availability of personnel in MERC’s service area. MERC developed materials to assist with the outreach efforts including compiled customer lists, a process flow for customer outreach, frequently asked question documentation, and other background information regarding EFVs and emergency shut-off valves. MERC worked with EN Engineering to develop scripts and other information for initial customer telephone calls.

EN Engineering initiated their outreach efforts in early 2020. For each identified customer, EN Engineering personnel have contacted the telephone number on the account. If the customer answers the telephone call, information regarding the purpose of the call is provided, and the representative from EN Engineering requests to set up an in-person meeting with the decision-maker of the customer regarding the purpose of EFVs and emergency shut-off valves, MERC’s installation policies, and the costs for

installation of an EFV. If no one answers the telephone on the first attempt, EN Engineering leaves a voice message with details regarding the purpose of the telephone call and a contact number for the customer to return the call. A second telephone attempt is made approximately five days after the initial attempt with a second voice message left if the customer still does not answer.

If the customer is not reached on the second attempt, MERC proposed to send a letter via certified mail to the customer. A copy of the letter MERC prepared is included as Attachment A to this filing. Additionally, a process flow diagram of the customer outreach process is included as Attachment B to this filing. As discussed in greater detail below, in light of current circumstances surrounding the infectious disease known as COVID-19, MERC intends to temporarily modify its customer outreach efforts.

Through March 6, 2020, EN Engineering contacted 84 customer contacts representing 160 service lines potentially eligible for installation of an EFV under the federal standards. Of those contacted, 18 customers requested and scheduled a face-to-face meeting and those meetings have taken place to provide customers with additional information.

Table 2. Customer Outreach Efforts – as of March 6, 2020

	Hospitals	Universities and Colleges	K-12 Schools
# of Customers Contacted	16	20	48
# of Face-to-Face Meetings	8	6	4

After two attempted telephone calls and voice messages, MERC was unable to make contact with 22 of the identified customers. Under MERC's approved communications plan, MERC intends to follow up with those 22 customers through a letter, a copy of which is included as Attachment A to this filing. However, given that K-12 schools, universities, and colleges across the state are currently shut down and/or subject to limited operations, and given that all hospital resources are focused on responding to the COVID-19 pandemic, MERC intends to postpone mailing letters to these customers until circumstances change.

Based on MERC's initial customer outreach, approximately eight customers have indicated an interest in possibly having an EFV installed on their natural gas service line. Of those, five customers have executed a letter of intent and three have indicated an interest in obtaining additional information from MERC regarding the exact location of the work to be performed and outage timelines to complete the work.

Table 3. Customers Interested in EFV Installation or Additional Information

	Hospitals	Universities and Colleges	K-12 Schools
# of Customers Who Signed a Letter of Intent	2	2	1
# of Customers Requesting Additional Information	1	2	N/A

At this time, in light of current circumstances related to the infectious disease known as COVID-19, the Company intends to temporarily suspend efforts to continue customer outreach during Minnesota’s Peacetime Emergency as declared by Minnesota Governor Tim Walz on March 13, 2020. While the Company will continue to be available to provide customers with information regarding EFVs upon request, given the current impacts on Minnesota’s healthcare system of the pandemic; Executive Orders 20-02 and 20-19, authorizing and directing the Commissioner of Education to temporarily close all K-12 schools through May 4, 2020, and to plan for distance learning; and Executive Order 20-20 directing Minnesotans to stay at home through April 10, 2020; the target customer groups are unlikely to be responsive to such outreach efforts at this time. Further, the temporary suspension of the Company’s EFV outreach efforts are necessary and appropriate in light of the U.S. Department of Health and Human Services declaration of a public health emergency and Governor Walz’s executive order 20-01, advising Minnesotans to engage in appropriate social distancing and 20-20, requiring Minnesotans to stay at home or in their place of residence, except to engage in permitted activities and critical sector work through April 10, 2020.⁷ Additionally, as discussed above, because these customer groups are currently shut down, subject to limited operations, and focused on addressing the current health situation in the State, MERC intends to temporarily suspend sending customer letters as it is likely such communications would be disregarded at this time.

Based on preliminary customer outreach efforts, MERC does intend to complete outreach to 20 percent of the identified customers by the end of 2020, subject to the developing circumstances surrounding COVID-19 and the need to prioritize continued safe and reliable natural gas service to customers across Minnesota.

C. Recovery Mechanism for the Additional Requirements of This Order

Based on the 3,696 customers MERC identified in its August 1, 2019, Compliance Filing, MERC provided the following cost estimates to conduct face-to-face meetings regarding the purpose of EFVs and manual service line shutoff valves, along with the

⁷ Emergency Executive Order 20-01, Declaring a Peacetime Emergency and Coordinating Minnesota’s Strategy to Protect Minnesotans from COVID-19 (Mar. 13, 2020); Emergency Executive Order 20-20, Directing Minnesotans to Stay at Home (Mar. 25, 2020).

utility's installation policy, and estimated costs; and to complete the additional customer-specific engineering analysis that would be required to verify eligibility for installation of an EFV.

Table 4. Cost Estimates to Conduct Face-to-Face Meetings

Face-to-Face meetings, including drive time (3,696 customers)	\$443,520
Engineering analysis to confirm eligibility for EFV (3,696 customers)	\$63,450
Total	\$506,970

In its July 31, 2019 Order, the Commission authorized deferral and recovery of EFV costs through gas utility infrastructure cost ("GUIC") rider filings, consistent with Ordering Paragraph 7.c of the Commission's August 20, 2018 Order.

MERC proposed to include forecasted 2020 EFV compliance costs in its 2020 GUIC Rider currently pending in Docket No. G011/M-19-282, subject to true-up based on actual costs incurred.⁸ MERC proposes to continue to track its actual costs to gather information and implement the customer outreach efforts, engineering analysis, and potential installation of EFVs for recovery in a future GUIC rider or general rate case filing and to continue to recover its forecasted compliance costs on an annual basis, subject to future true-up, through the GUIC rider. To the extent MERC's customer outreach results in customer requests for installation of EFVs, the costs of those installations and any associated maintenance should appropriately be deferred as a regulatory asset for future recovery through a GUIC or other rider or in a future rate case proceeding. MERC also proposes that any costs incurred to install manual service line shut off valves also continue to be socialized to all ratepayers and be deferred under the same conditions outlined for EFVs.

⁸ See *In the Matter of the Petition of Minn. Energy Res. Corp. for Approval of 2020 Gas Util. Infrastructure Cost (GUIC) Rider Revenue Requirement and Revised Surcharge Factor*, Docket No. G011/M-19-282, REPLY COMMENTS OF MINNESOTA ENERGY RESOURCES CORPORATION at 15-17 (Sept. 17, 2019); ADDITIONAL REPLY COMMENTS OF MINNESOTA ENERGY RESOURCES CORPORATION at 14-15 (Feb. 14, 2020).

Mr. Will Seuffert
March 31, 2020
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Please contact me at (414) 221-4208 if you have any questions regarding the information in this filing. Thank you for your attention to this matter.

Sincerely,

A handwritten signature in black ink that reads "Joylyn C. Hoffman Malueg". The signature is written in a cursive style with a large initial "J" and "M".

Joylyn C. Hoffman Malueg
Project Specialist 3
Minnesota Energy Resources Corporation

Enclosures
cc: Service List



Minnesota Energy Resources Corporation
2685 145th Street West
Rosemount, MN 55068
www.minnesotaenergyresources.com

[DATE]

Dear Customer:

This letter is in follow-up to Minnesota Energy Resources' recent attempt to reach you by telephone through our contractor, EN Engineering, regarding excess flow valves.

Excess flow valves, or EFVs, are mechanical safety devices installed on a natural gas service line. In the event the underground natural gas service line is broken or severed between the street and the meter, causing a sudden and major pressure drop, an EFV is designed to minimize the flow of natural gas through the service line. An EFV does not protect against leaks on customer-owned piping or equipment beyond the meter.

Federal law requires EFVs to be installed on newly constructed or replaced natural gas lines, though some limitations apply depending on the operating parameters of a customer's service line. On existing service lines, it is up to the customer to choose whether to install an EFV, if operating parameters allow. If a customer chooses to have Minnesota Energy Resources install an EFV, the customer will be charged for any excavation and surface restoration costs.

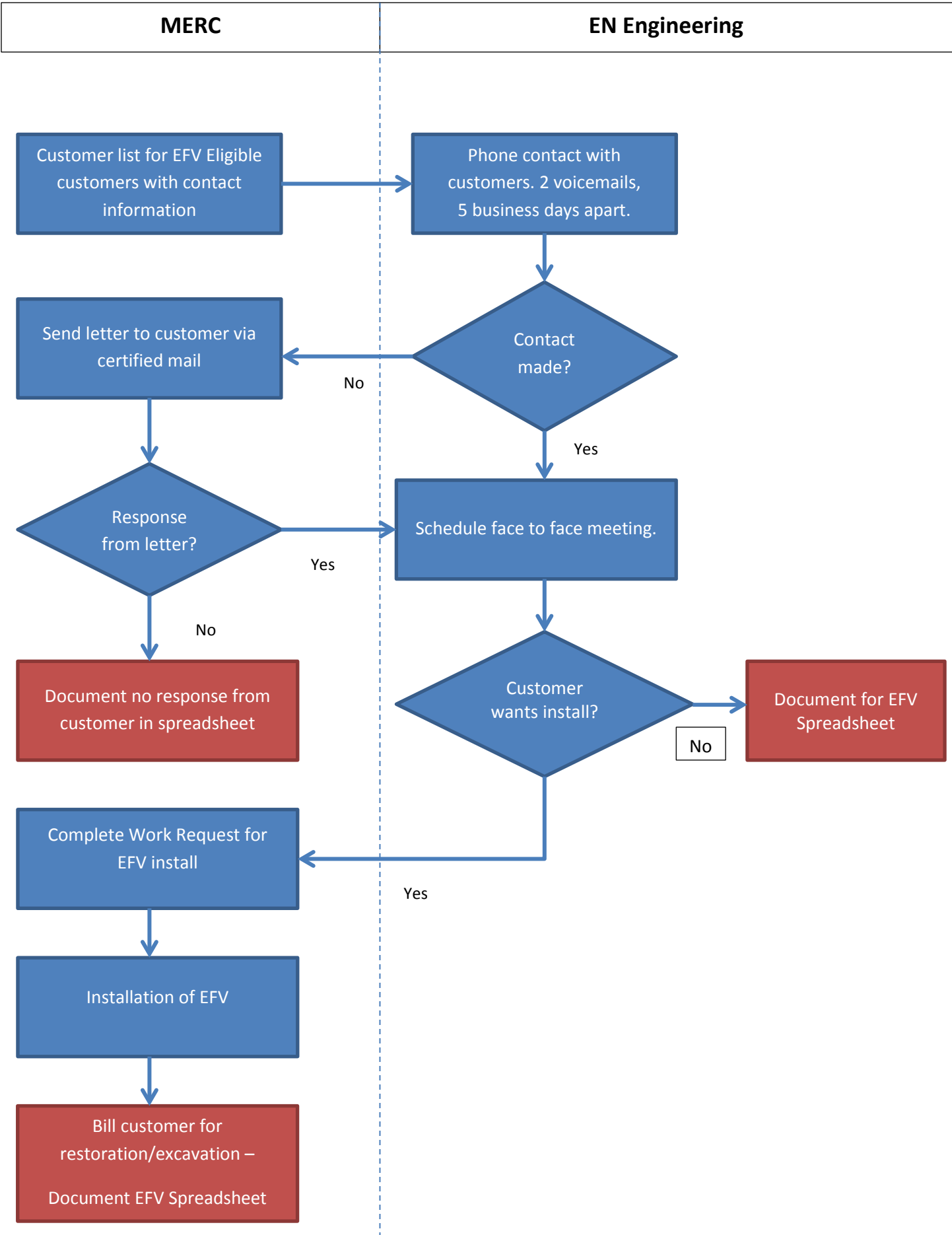
We would like to schedule a meeting with you to further discuss the purpose, installation process and costs of EFVs and service line shutoff valves.

If you are interested in scheduling a meeting, respond to this letter by calling or sending an email at the contact information provided below by **[DATE]** to indicate your interest and availability.

Sincerely,

Minnesota Energy Resources

[Telephone/Email Address]



In the Matter of a Commission
Investigation into Natural Gas Utilities'
Practices, Tariffs, and Assignment of Cost
Responsibility for Installation of Excess
Flow Valves and Other Similar Gas
Safety Equipment

Docket No. G999/CI-18-41

CERTIFICATE OF SERVICE

I, Kristin M. Stastny, hereby certify that on the 31st day of March, 2020, on behalf of Minnesota Energy Resources Corporation (MERC), I electronically filed a true and correct copy of the enclosed Compliance Filing on www.edockets.state.mn.us. Said documents were also served via U.S. mail and electronic service as designated on the attached service list.

Dated this 31st day of March, 2020.

/s/ Kristin M. Stastny
Kristin M. Stastny

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 Bismarck, ND 585014092	Electronic Service	No	OFF_SL_18-41_Official
Kristine	Anderson	kanderson@greatermngas.com	Greater Minnesota Gas, Inc. & Greater MN Transmission, LLC	1900 Cardinal Lane PO Box 798 Faribault, MN 55021	Electronic Service	No	OFF_SL_18-41_Official
David	Blomseth	davidb@communitycoops.com	Community Co-ops of Lake Park	PO Box 329 14583 Hwy 10 W Lake Park, MN 56554	Electronic Service	No	OFF_SL_18-41_Official
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_18-41_Official
Randy	Dooley	rdooley@dooleypetro.com	Dooley's Natural Gas LLC	3101 3rd Ave SW Willmar, MN 56201	Electronic Service	No	OFF_SL_18-41_Official
Steve	Downer	sdowner@mmua.org	MMUA	3025 Harbor Ln N Ste 400 Plymouth, MN 554475142	Electronic Service	No	OFF_SL_18-41_Official
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 551012198	Electronic Service	No	OFF_SL_18-41_Official
Mike	Gorham	mike@nwgas.com	Northwest Gas of Cass County L.L.C.	1608 NW 4th St Grand Rapids, MN 55744	Electronic Service	No	OFF_SL_18-41_Official
Travis	Jacobson	travis.jacobson@mdu.com	Great Plains Natural Gas Company	400 N 4th St Bismarck, ND 58501	Electronic Service	No	OFF_SL_18-41_Official
Jack	Kegel	jkegel@mmua.org	MMUA	3025 Harbor Lane N Suite 400 Plymouth, MN 55447-5142	Electronic Service	No	OFF_SL_18-41_Official

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Amy	Liberkowski	amy.a.liberkowski@xcelenergy.com	Xcel Energy	414 Nicollet Mall 7th Floor Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_18-41_Official
Douglas	Lund	doug.lund@ufcmn.com	United Natural Gas, LLC	705 E. 4th Street PO Box 461 Winthrop, MN 55396	Electronic Service	No	OFF_SL_18-41_Official
Brian	Meloy	brian.meloy@stinson.com	STINSON LLP	50 S 6th St Ste 2600 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_18-41_Official
Greg	Palmer	gpalmer@greatermngas.com	Greater Minnesota Gas, Inc. & Greater MN Transmission, LLC	1900 Cardinal Ln PO Box 798 Faribault, MN 55021	Electronic Service	No	OFF_SL_18-41_Official
Catherine	Phillips	catherine.phillips@we-energies.com	We Energies	231 West Michigan St Milwaukee, WI 53203	Electronic Service	No	OFF_SL_18-41_Official
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_18-41_Official
Amanda	Rome	amanda.rome@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 5 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_18-41_Official
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th PI E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_18-41_Official
Rachel	Sorrentino	rachel@nwgas.com	Northwest Gas	1608 NW 4th St Grand Rapids, MN 55744	Electronic Service	No	OFF_SL_18-41_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Mary	Wolter	mary.wolter@wecenergygroup.com	Minnesota Energy Resources Corporation (HOLDING)	231 West Michigan St Milwaukee, WI 53203	Electronic Service	No	OFF_SL_18-41_Official