

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

June 6, 2016



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

**Re: In the Matter of a Commission Inquiry into Fees Charged on Qualifying Facilities
Docket No. E999/CI-15-755
REPLY COMMENTS**

Dear Mr. Wolf:

Enclosed for filing in the above-referenced matter are Otter Tail Power Company's (Otter Tail) Reply Comments.

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

If you have any questions regarding this filing, please contact me at 218-739-8956 or at cstephenson@otpc.com.

Sincerely,

/S/ CARY STEPHENSON
Cary Stephenson
Associate General Counsel

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Enclosures
By electronic filing
c: Service List

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

In the Matter of a Commission
Inquiry into Fees Charged on
Qualifying Facilities

Docket No. E999/CI-15-755

**OTTER TAIL POWER
COMPANY'S REPLY COMMENTS**

I. INTRODUCTION

Otter Tail Power Company (“Otter Tail” or the “Company”) files the following Reply Comments in the above-referenced matter.

II. OVERVIEW

Otter Tail appreciates the opportunity to respond to the many comments filed by various interests in this docket. The comments are voluminous but contain common threads and arguments. In an effort to be concise, Otter Tail’s response makes the following core points:

1. Otter Tail’s customer charges are authorized by statute, rule and commission order.
2. Minn. Stat. § 216B.164 permits recovery of interconnection costs and other fixed charges normally assessed to non-generating customers through monthly customer charges;
3. Otter Tail’s customer charges are reasonable and non-discriminatory; and
4. Changes in Commission policy and practice concerning the promotion of distributed generation under Minn. Stat. § 216B.164 should be applied prospectively and not retroactively.

III. OTTER TAIL'S REPLY COMMENTS

A. Otter Tail's Customer Charges are Authorized by Statute, Rule and Commission Order.

Many commenters maintain that customer charges specific to qualifying facilities are barred by Minn. Stat. § 216B.164. A common argument appears to rely on truncated portions of the statute. These arguments are without substance. A full reading of 216B.164, its implementing rules, and Commissions orders makes clear that customer charges for the incremental expense of metering equipment and associated administration and maintenance expenses are authorized by law. Minn. Stat. § 216B.164 subd.8(b) provides as follows:

(b) Nothing contained in this section shall be construed to excuse the qualifying facility from any obligation for costs of interconnection and wheeling in excess of those normally incurred by the utility for customers with similar load characteristics who are not cogenerators or small power producers, or from any fixed charges normally assessed such nongenerating customers.

Reasonable metering cost, including the cost of equipment, administration and maintenance are interconnection costs under Minn. Rule 7835.0100:

"Interconnection costs" means the reasonable costs of connection, switching, metering, transmission, distribution, safety provisions, and administrative costs incurred by the utility that are directly related to installing and maintaining the physical facilities necessary to permit interconnected operations with a qualifying facility.

Interconnection costs apply to qualifying facilities regardless of the size of the qualifying facility.

Otter Tail's small power producer customer charges reflect (1) the cost of non-standard equipment, (2) directly related annual per meter O&M expenses; and (3) directly related annual per meter administrative costs (customer accounts, services, and informational expense).¹ These metering, maintenance and administrative costs are interconnection costs authorized by Stat. § 216B.164 and its implementing regulations.

¹ See *Otter Tail Response to Information Request MN-PUC 003*. For solar net energy billing customers OTP uses a bi-directional KWh meter at the point of service and a KWh meter to measure output of the solar generator. For other installations OTP utilizes a bidirectional KWh at the point of service or as required to properly measure energy flows. See *Otter Tail Response to Information Request MN-PUC 001*.

Moreover Otter Tail's current rates, including its customer charges have been approved by the Commission in a general rate case.² That the Commission has approved these charges in a rate case should preclude retroactive arguments as to whether the charges are authorized by law.

Even if the Commission determined that portions of Otter Tail's small power producer customer charges fell outside the definition of interconnection costs the charges would still be authorized by Minn. Stat. § 216B.164 subd. 8(b), which explicitly states that qualifying facilities are not excused from any fixed charges normally assessed non-generating customers.

Otter Tail normally assesses customer charges to non-generating customers requiring specialized equipment in order to recover a portion of the equipment expense and directly related O & M and administrative expenses. For example, Otter Tail assesses customers electing to have a controlled water heater a monthly \$2.00 customer charge under the Company's Water Heating Control Rider.³ The customer charge recovers a portion of the expense of the additional, non-standard equipment and O & M and administrative expenses directly associated with the provision of this specialized rate. The customer charge is based on traditional cost-causation principles. Otter Tail emphasized this point in its Comments. Disallowing similar charges for distributed generation customers would in fact excuse those customers from charges normally assessed non-generating customers, creating a favored category of customer inconsistent with Minn. Stat. § 216B.164 subd. 8(b).

The 2015 amendment to Minn. Stat. § 216B.164 subdivision 3 applicable to cooperative and municipal utilities does not alter the obligation of qualifying facilities to pay reasonable interconnection charges and other fixed charges normally assessed non-generating customers. The 2015 amendment states in part that "[a] cooperative electric association or municipal utility may charge an additional fee to recover the fixed costs not already paid for by the customer through the customer's existing billing arrangement. Any additional charge by the utility must be reasonable and appropriate for that class of customer based on the most recent cost of service study."

² Docket No. E017/GR-10-239.

³ Section 14.01 of Otter Tail's tariff.

Some comments suggest that the 2015 amendment authorizes customer charges for incremental costs of metering and associated maintenance and administrative expenses, which in turn means that public utilities' recovery of these expenses has not been previously authorized. This ignores subdivision 8(b) of Minn. Stat. § 216B.164 and the Commission's Order Adopting Rules, Docket No. E-999/R-80-560 that discusses metering and related charges as the responsibility of qualifying facilities. By implication the 2015 amendment must authorize recovery of fixed costs and expense not previously authorized by Minn. Stat. § 216B.164, such as fixed cost that are part of the energy charge of a cooperative electric association or municipal utility.⁴

B. Minn. Stat. § 216B.164 Permits Monthly Customer Charges.

A number of commentators argue that that reoccurring monthly charges are unlawful, or if lawful, must be assessed as a one time, upfront charge at the time of interconnection. The Department of Commerce, Division of Energy Resources ("DOC") appears to object to monthly charges, stating that "recovery of a one-time cost on a monthly basis in perpetuity is not reasonable" in apparent reference to the cost of equipment.⁵ Otter Tail respectfully disagrees.

Arguments that monthly charges are unlawful or inconsistent with the state-approved standard contract incorrectly assume that interconnection costs are one-time expense strictly limited to the cost of equipment. Interconnection costs include administrative and maintenance expenses which are inherently on-going expenses directly related to and caused by the interconnection with the qualifying facility. The same holds true if these expenses are considered fixed fees normally assessed non-generating customers.

Arguments against monthly charges also fail to recognize the impracticability and expense of trying to recover all authorized costs as a onetime charge at the time of interconnection. A one-time, upfront charge would necessarily require customer-specific calculations and higher

⁴ Otter Tail understands that this issue is the subject of another docket. The existence of one or more other dockets construing Minn. Stat. § 216B.164 is another reason for caution in this docket.

⁵ Comments of the Minnesota Department of Commerce, Division of Energy Resources, May 6, 2016, p 5.

administrative costs, all of which would be resisted by distributed generation customers. While some customer-specific calculations are warranted⁶, it would be very difficult to determine a reasonable one time, upfront charge for all authorized expenses. Another concern is that one time, upfront charges do not allow adjustments when technology or expenses change. The lack of the ability to adjust customer charges for interconnection costs could result in significant disparities among distributed generation customers depending on when they entered into the state-approved contract. Another consideration is that a one time, upfront charge for all expenses forces the customer to assume the risk that the customer's generation system will be in operation for a period of time corresponding to the charge. Some customers could cease generation earlier than anticipated forfeiting the value of the upfront payment.⁷ Likewise a one-time, upfront charge for metering equipment and on-going expenses directly associated with the administration and maintenance of that equipment could pose a significant upfront cost to qualifying facilities, creating a barrier for the development of distributed generation.

Nothing in Minn. Stat. § 216B.164 precludes monthly charges, or mandates one time, upfront charges. The Commission has also recognized that interconnection costs could be recovered through different mechanisms including on-going monthly charges. In its 1983 Order Adopting Rules for Minn. Stat. § 216B.164, the Commission discussed the reasonableness of a hypothetically billing arrangement incorporating a "monthly carrying cost" for an additional meter.⁸ Consistent with this, the long standing practice among Minnesota utilities has been to recover metering costs through monthly charges filed and approved by the Commission miscellaneous docket and other filings.

Otter Tail has maintained a monthly customer charge in its small power producer tariffs since 1983, with its current customer charges incorporated into small power producer riders approved in Otter Tail's last general rate case. To conclude that monthly customer charges for authorized interconnection costs is inappropriate cuts against decades of established practice and reasonable expectations. Among other things, such a determination could have significant unanticipated

⁶ For example, the expense of line extensions is appropriately a one time, customer specific expense.

⁷ It would be burdensome and expense for utilities to have to implement a refund process for such customers.

⁸ Order Adopting Rules, Docket E-999/R-80-560, March 7, 1983, p. 62-63.

and undesirable effect. Otter Tail believes this risk warrants a cautious, prospective approach to change to the extent change is deemed appropriate.

C. Otter Tail's Customer Charges Are Reasonable and Non-Discriminatory.

Many comments contend that even if utilities are authorized to recover monthly interconnection charges or fixed charges normally assessed non-generating customers the utilities have failed to demonstrate the reasonableness of their charges, and/or the utilities' charges are discriminatory. Otter Tail disagrees.

Otter Tail has **already** met any burden it may have to demonstrate the reasonableness and the non-discriminatory nature of its rates, including customer charges for small power producers when Otter Tail's rates were approved in the Company's last general rate case. Therefore any argument that Otter Tail should reimburse customers these charges asks the Commission to engage in retroactive ratemaking and should be rejected. Likewise arguments that utilities should suspend customer charges approved by the Commission prospectively are not supported by the record and in Otter Tail's view outside the scope of this docket.

Regardless of the Commission's previous approval of Otter Tail's rates, there is ample evidence that Otter Tail's customer charges are reasonable and non-discriminatory. For context, Otter Tail has maintained customer charges in its small power producer tariffs since 1983. As shown in Table 1, Comparison of Customer Charges: Net Energy Billing vs. Residential Service, Otter Tail's net energy billing rate is illustrative as reasonable and non-discriminatory:

Table 1, Comparison of Customer Charges: Net Energy Billing vs. Residential Service

| Year | Net Energy Billing Rate - Monthly Customer Charge | Applicable Commission Dockets for Small Power Producer - Customer Charges | Residential Service - Monthly Customer Charge -Zone 1 | Applicable Commission Dockets for Residential Service - Customer Charges |
|------|---|---|---|--|
| 1983 | \$ 1.40 | E120/M83-388 | \$ 5.95 | |
| 1984 | \$ 1.40 | E017/CG84-384 | \$ 5.95 | |
| 1985 | \$ 1.40 | | \$ 5.95 | |
| 1986 | \$ 1.40 | | \$ 5.95 | |
| 1987 | \$ 1.40 | | \$ 6.15 | |
| 1988 | \$ 1.40 | | \$ 6.15 | |
| 1989 | \$ 1.40 | | \$ 6.15 | |
| 1990 | \$ 1.40 | | \$ 6.15 | |
| 1991 | \$ 1.40 | | \$ 6.15 | |
| 1992 | \$ 1.40 | | \$ 6.15 | |
| 1993 | \$ 1.40 | | \$ 6.15 | |
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| 1998 | \$ 1.40 | | \$ 6.15 | |
| 1999 | \$ 1.40 | | \$ 6.15 | |
| 2000 | \$ 1.40 | | \$ 6.15 | |
| 2001 | \$ 1.40 | | \$ 6.15 | |
| 2002 | \$ 1.40 | | \$ 6.15 | |
| 2003 | \$ 1.40 | | \$ 6.15 | |
| 2004 | \$ 1.40 | | \$ 6.15 | |
| 2005 | \$ 1.40 | | \$ 6.15 | |
| 2006 | \$ 1.40 | | \$ 6.15 | |
| 2007 | \$ 1.40 | | \$ 6.48 - Interim Rate | E-017/GR-07-1178 |
| 2008 | \$ 1.40 | | \$ 6.48 - Interim Rate | |
| 2009 | \$ 1.40 | | \$ 8.00 | E-017/GR-07-1178 |
| 2010 | \$ 1.45 - Interim Rate | E-017/GR-10-239 | \$ 8.30 | E-017/GR-10-239 |
| 2011 | \$ 1.45 - Interim Rate | | \$ 8.30 | |
| 2011 | \$ 3.70 | | \$ 8.50 | |
| 2012 | \$ 3.70 | | \$ 8.50 | |
| 2013 | \$ 3.70 | | \$ 8.50 | |
| 2014 | \$ 3.70 | | \$ 8.50 | |
| 2015 | \$ 3.70 | | \$ 8.50 | |
| 2016 | \$ 3.70 | | \$ 8.50 | |
| 2016 | \$ 4.05 - Interim Rate | E-017/GR-15-1033 | \$9.31 - Interim Rate | E-017/GR-15-1033 |

As Table 1 indicates Otter Tail's customer charges remained unchanged for 26 years and have increased very little overtime. In Docket No. E017/GR-10-239 Otter Tail rates including its customer charges were supported by cost of service and marginal cost studies and testimony⁹. At no time were these charges challenged or questioned as unreasonable or unlawful.

In this docket Otter Tail has provided a comparison of expenses for customers with and without distributed generation.¹⁰ The comparison showed the significant differences in expenses between distributed generation ("DG") and non-DG customers, including the following data:

- Meter Cost (single phase)
 - Meter Required for DG Customer: approximately \$161
 - Standard Meter for non DG Customer: approximately \$20
- Annual per meter O & M expense (single phase)
 - DG Customer: approximately \$25
 - Non-DG Customer: approximately \$9
- Annual per meter (single phase) administrative expense for customer accounts, services and information:
 - DG customer: approximately \$106
 - Non-DG customer \$86.

Customer charges are adjusted for bill impacts. The unadjusted expenses, however, show the significant incremental expenses associated with DG service vs non-DG service. On their face, the expense differentials indicate it is neither unreasonable nor discriminatory to charge DG net billing customers an additional \$3.70 per month more than that charged non-DG customers. The DG customer charges reflect incremental costs on top of and not overlapping with non-DG customer charges. If the Commission requires more detailed analysis OTP will of course comply.¹¹ Otter Tail would urge that the level of analysis applied to validating the

⁹ *Rate Design Testimony of David G. Prazak, pp. 63-65, Volume 2B, Direct Testimony and Supporting Schedules.*

¹⁰ *Otter Tail Response to Information Request MN-PUC 003.* Please note that the expenses information provided in this IR response was based on current costs.

¹¹ Otter Tail did not respond to discovery request propounded by Energy Freedom Coalition of America (EFCA). Otter Tail could not identify any legal basis for EFCA, a non-party lacking statutory standing to engage in discovery

reasonableness of customer charges have some level of proportionality with the magnitude of the charges. It seems that some commenters demand a level of analysis that will cause utilities to question whether the administrative burden of determining charges is worth the small amount of expense recovered.

Some commentators such as the Sierra Club assert that the reasonableness of utilities customers charges under Minn. Stat. § 216B.164 should take into account a wide range of factors including factors at issue in the Minnesota Value of Solar docket. Otter Tail believes this argument raises significant policy questions and choices that exceed the scope and intention of this docket. Moreover a final order has not issued in Value of Solar matter, making any application of factors rooted in that docket premature.

D. Changes in Commission Policy and Practice Concerning the Promotion of Distributed Generation under Minn. Stat. § 216B.164 should be Applied Prospective and not Retroactively.

Otter Tail acknowledges that much has change concerning distributed generation and technology around qualifying facilities over the last 30 years. Otter Tail also acknowledges that the Commission has significant discretion in striking a balance under Minn. Stat. § 216B.164 between promotion of distributed generation and the protecting the interest of all rate payers.

The Commission may elect to shift its weighting of policy considerations, effectively putting its thumb more heavily on the side of scale promoting distributed generation, which may in turn result in result in a different process in assessing interconnection costs than what has previously occurred. While action of this nature is within the Commission's discretion, Otter Tail respectfully submits that such action would exceed the scope and intent of this docket.

Regardless of whether within the scope of this docket or not, such policy choices of this matter should be made on a prospective basis, with clear direction to utilities, ensuring that utilities may

in a Commission-initiated investigation. Moreover review of prior Commission initiated investigation dockets indicated no prior precedent for such discovery requests. EFCA, which does not claim to represent any specific OTP customer, issued voluminous requests that in Otter Tail's judgment risked establishing a precedent unsupported by law and skewing the Commission-investigation process.

recover reasonable and prudent costs while complying with the Commission's interpretation of applicable law.

Dated: June 6, 2016

Respectfully Submitted,

OTTER TAIL POWER COMPANY

By: /s/ CARY STEPHENSON
Cary Stephenson
Associate General Counsel
215 S. Cascade Street
Fergus Falls, MN 56537
(218) 739-8956
cstephenson@otpc.com

CERTIFICATE OF SERVICE

RE: **In the Matter of a Commission Inquiry into Fees Charged on Qualifying Facilities
Docket No. E999/CI-15-755**

I, Nancy L. Olson, hereby certify that I have this day served a copy of the following, or a summary thereof, on Daniel P. Wolf and Sharon Ferguson by e-filing, and to all other persons on the attached service list by electronic service or by First Class Mail.

**Otter Tail Power Company
Reply Comments**

Dated this **6th** day of **June 2016**.

/s/ NANCY L. OLSON

Nancy L. Olson, Regulatory Filing Coordinator
Otter Tail Power Company
215 South Cascade Street
Fergus Falls MN 56537
(218) 739-8376

| First Name | Last Name | Email | Company Name | Address | Delivery Method | View Trade Secret | Service List Name |
|-------------|--------------|----------------------------------|---|---|--------------------|-------------------|--|
| Ross | Abbey | ross@mysunshare.com | SunShare, LLC | 609 S. 10th Street Suite 210 Minneapolis, MN 55404 | Electronic Service | No | OFF_SL_15-755_Official Service List_PUC |
| Michael | Allen | michael.allen@allenergysolar.com | All Energy Solar | 721 W 26th st Suite 211 Minneapolis, Minnesota 55405 | Electronic Service | No | OFF_SL_15-755_Official Service List_PUC |
| Christopher | Anderson | canderson@allete.com | Minnesota Power | 30 W Superior St Duluth, MN 558022191 | Electronic Service | No | OFF_SL_15-755_Official Service List_PUC |
| 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_15-755_Official Service List_PUC |
| Sara | Baldwin Auck | sarab@irecusa.org | Interstate Renewable Energy Council, Inc. | PO Box 1156 Latham, NY 12110 | Electronic Service | No | OFF_SL_15-755_Official Service List_PUC |
| Derek | Bertsch | derek.bertsch@mrenergy.com | Missouri River Energy Services | 3724 West Avera Drive PO Box 88920 Sioux Falls, SD 57109-8920 | Electronic Service | No | OFF_SL_15-755_Official Service List_PUC |
| William A. | Blazar | bblazar@mnchamber.com | Minnesota Chamber Of Commerce | Suite 1500 400 Robert Street North St. Paul, MN 55101 | Electronic Service | No | OFF_SL_15-755_Official Service List_PUC |
| Kenneth | Bradley | kbradley1965@gmail.com | | 2837 Emerson Ave S Apt CW112 Minneapolis, MN 55408 | Electronic Service | No | OFF_SL_15-755_Official Service List_PUC |
| Jon | Brekke | jbrekke@greenergy.com | Great River Energy | 12300 Elm Creek Boulevard Maple Grove, MN 553694718 | Electronic Service | No | OFF_SL_15-755_Official Service List_PUC |
| Kathleen M. | Brennan | kmb@mcgrannshea.com | McGrann Shea Carnival, Straughn & Lamb, Chartered | N/A | Electronic Service | No | OFF_SL_15-755_Official Service List_PUC |
| Christina | Brusven | cbrusven@fredlaw.com | Fredrikson Byron | 200 S 6th St Ste 4000 Minneapolis, MN 554021425 | Electronic Service | No | OFF_SL_15-755_Official Service List_PUC |

| First Name | Last Name | Email | Company Name | Address | Delivery Method | View Trade Secret | Service List Name |
|------------|-----------|----------------------------------|---|---|--------------------|-------------------|---|
| Michael J. | Bull | mbull@mncee.org | Center for Energy and Environment | 212 Third Ave N Ste 560 Minneapolis, MN 55401 | Electronic Service | No | OFF_SL_15-755_Official Service List_PUC |
| Jessica | Burdette | jessica.burdette@state.mn.us | Department of Commerce | 85 7th Place East Suite 500 St. Paul, MN 55101 | Electronic Service | No | OFF_SL_15-755_Official Service List_PUC |
| Joel | Cannon | jcannon@tenksolar.com | Tenk Solar, Inc. | 9549 Penn Avenue S Bloomington, MN 55431 | Electronic Service | No | OFF_SL_15-755_Official Service List_PUC |
| Douglas M. | Carnival | dmc@mcgrannshea.com | McGrann Shea Carnival Straughn & Lamb | N/A | Electronic Service | No | OFF_SL_15-755_Official Service List_PUC |
| John J. | Carroll | jcarroll@newportpartners.com | Newport Partners, LLC | 9 Cushing, Suite 200 Irvine, California 92618 | Electronic Service | No | OFF_SL_15-755_Official Service List_PUC |
| Kenneth A. | Colburn | kcolburn@symbioticstrategies.com | Symbiotic Strategies, LLC | 26 Winton Road Meredith, NH 32535413 | Electronic Service | No | OFF_SL_15-755_Official Service List_PUC |
| George | Crocker | gwillc@nawo.org | North American Water Office | PO Box 174 Lake Elmo, MN 55042 | Electronic Service | No | OFF_SL_15-755_Official Service List_PUC |
| Arthur | Crowell | Crowell.arthur@yahoo.com | A Work of Art Landscapes | 234 Jackson Ave N Hopkins, MN 55343 | Electronic Service | No | OFF_SL_15-755_Official Service List_PUC |
| Leigh | Currie | lcurrie@mncenter.org | Minnesota Center for Environmental Advocacy | 26 E. Exchange St., Suite 206 St. Paul, Minnesota 55101 | Electronic Service | No | OFF_SL_15-755_Official Service List_PUC |
| David | Dahlberg | davedahlberg@nweco.com | Northwestern Wisconsin Electric Company | P.O. Box 9 104 South Pine Street Grantsburg, WI 548400009 | Electronic Service | No | OFF_SL_15-755_Official Service List_PUC |
| | | | | | | | |

| First Name | Last Name | Email | Company Name | Address | Delivery Method | View Trade Secret | Service List Name |
|------------|----------------|-------------------------------------|---------------------------------------|---|--------------------|-------------------|--|
| James | Darabi | james.darabi@solarfarm.com | Solar Farm, LLC | 2355 Fairview Ave #101 St. Paul, MN 55113 | Electronic Service | No | OFF_SL_15-755_Official Service List_PUC |
| Dustin | Denison | dustin@appliedenergyinnovations.org | Applied Energy Innovations | 4000 Minnehaha Ave S Minneapolis, MN 55406 | Electronic Service | No | OFF_SL_15-755_Official Service List_PUC |
| James | Denniston | james.r.denniston@xcenergy.com | Xcel Energy Services, Inc. | 414 Nicollet Mall, Fifth Floor Minneapolis, MN 55401 | Electronic Service | No | OFF_SL_15-755_Official Service List_PUC |
| Curt | Dieren | curt.dieren@dgr.com | L&O Power Cooperative | 1302 S Union St Rock Rapids, IA 51246 | Electronic Service | No | OFF_SL_15-755_Official Service List_PUC |
| 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_15-755_Official Service List_PUC |
| Mike | Eggl | megg1@bepc.com | Basin Electric Power Cooperative | 1717 East Interstate Avenue Bismarck, ND 58503 | Electronic Service | No | OFF_SL_15-755_Official Service List_PUC |
| Kristen | Eide Tollefson | N/A | R-CURE | 28477 N Lake Ave Frontenac, MN 55026-1044 | Paper Service | No | OFF_SL_15-755_Official Service List_PUC |
| Betsy | Engelking | betsy@geronimoenergy.com | Geronimo Energy | 7650 Edinborough Way Suite 725 Edina, MN 55435 | Electronic Service | No | OFF_SL_15-755_Official Service List_PUC |
| Oncu | Er | oncu.er@avantenergy.com | Avant Energy, Agent for MMPA | 220 S. Sixth St. Ste. 1300 Minneapolis, MN 55402 | Electronic Service | No | OFF_SL_15-755_Official Service List_PUC |

| First Name | Last Name | Email | Company Name | Address | Delivery Method | View Trade Secret | Service List Name |
|------------|------------|---------------------------------|-----------------------------------|---|--------------------|-------------------|---|
| John | Farrell | jfarrell@ilsr.org | Institute for Local Self-Reliance | 1313 5th St SE #303 Minneapolis, MN 55414 | Electronic Service | No | OFF_SL_15-755_Official Service List_PUC |
| Emma | Fazio | emma.fazio@stoel.com | Stoel Rives LLP | 33 South Sixth Street Suite 4200 Minneapolis, MN 55402 | Electronic Service | No | OFF_SL_15-755_Official Service List_PUC |
| 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_15-755_Official Service List_PUC |
| Kevin T. | Fox | kfox@kfwlaw.com | KEYES, FOX & WIEDMAN, LLP | 1580 N. Lincoln St Ste 880 Denver, CO 80203 | Electronic Service | No | OFF_SL_15-755_Official Service List_PUC |
| Nathan | Franzen | nathan@geronimoenergy.com | Geronimo Energy | 7650 Edinborough Way Suite 725 Edina, MN 55435 | Electronic Service | No | OFF_SL_15-755_Official Service List_PUC |
| Amy | Fredregill | Amy.S.Fredregill@xcelenergy.com | Xcel Energy | 414 Nicollet Mall Minneapolis, MN 55401 | Electronic Service | No | OFF_SL_15-755_Official Service List_PUC |
| Hal | Galvin | halgalvin@comcast.net | Provectus Energy Development llc | 1936 Kenwood Parkway Minneapolis, MN 55405 | Electronic Service | No | OFF_SL_15-755_Official Service List_PUC |
| Elaine | Garry | egarry@peoplesrec.com | Peoples Energy Cooperative | 1775 Lake Shady Ave S Oronoco, MN 55960-2351 | Electronic Service | No | OFF_SL_15-755_Official Service List_PUC |
| Edward | Garvey | garveyed@aol.com | Residence | 32 Lawton St Saint Paul, MN 55102 | Electronic Service | No | OFF_SL_15-755_Official Service List_PUC |
| Allen | Gleckner | gleckner@fresh-energy.org | Fresh Energy | 408 St. Peter Street Ste 220 Saint Paul, Minnesota 55102 | Electronic Service | No | OFF_SL_15-755_Official Service List_PUC |

| First Name | Last Name | Email | Company Name | Address | Delivery Method | View Trade Secret | Service List Name |
|------------|-----------|------------------------------------|---|---|--------------------|-------------------|---|
| Bryan | Gower | bgower@apx.com | APX, Inc. | N/A | Electronic Service | No | OFF_SL_15-755_Official Service List_PUC |
| Timothy | Gulden | info@winonarenewableenergy.com | Winona Renewable Energy, LLC | 1449 Ridgewood Dr Winona, MN 55987 | Electronic Service | No | OFF_SL_15-755_Official Service List_PUC |
| Tony | Hainault | anthony.hainault@co.hennepin.mn.us | Hennepin County DES | 701 4th Ave S Ste 700 Minneapolis, MN 55415-1842 | Electronic Service | No | OFF_SL_15-755_Official Service List_PUC |
| Duane | Hebert | duane.hebert@novelenergy.biz | Novel Energy Solutions | 1628 2nd Ave SE Rochester, MN 55904 | Electronic Service | No | OFF_SL_15-755_Official Service List_PUC |
| John | Helmets | helmets.john@co.olmsted.mn.us | Olmsted County Waste to Energy | 2122 Campus Drive SE Rochester, MN 55904-4744 | Electronic Service | No | OFF_SL_15-755_Official Service List_PUC |
| Jared | Hendricks | hendricksj@owatonnautilities.com | Owatonna Public Utilities | PO Box 800 208 S Walnut Ave Owatonna, MN 55060-2940 | Electronic Service | No | OFF_SL_15-755_Official Service List_PUC |
| Annete | Henkel | mui@mnuutilityinvestors.org | Minnesota Utility Investors | 413 Wacouta Street #230 St. Paul, MN 55101 | Electronic Service | No | OFF_SL_15-755_Official Service List_PUC |
| Lynn | Hinkle | lhinkle@mnseia.org | Minnesota Solar Energy Industries Association | 2512 33rd Ave South #2 Minneapolis, MN 55406 | Electronic Service | No | OFF_SL_15-755_Official Service List_PUC |
| Jim | Horan | Jim@MREA.org | Minnesota Rural Electric Association | 11640 73rd Ave N Maple Grove, MN 55369 | Electronic Service | No | OFF_SL_15-755_Official Service List_PUC |
| Ashley | Houston | | | 120 Fairway Rd Chestnut Hill, MA 24671850 | Paper Service | No | OFF_SL_15-755_Official Service List_PUC |

| First Name | Last Name | Email | Company Name | Address | Delivery Method | View Trade Secret | Service List Name |
|------------|-----------|------------------------------|-------------------------------------|--|--------------------|-------------------|---|
| Lori | Hoyum | lhoyum@mnpower.com | Minnesota Power | 30 West Superior Street Duluth, MN 55802 | Electronic Service | No | OFF_SL_15-755_Official Service List _PUC |
| Jan | Hubbard | jan.hubbard@comcast.net | | 7730 Mississippi Lane Brooklyn Park, MN 55444 | Electronic Service | No | OFF_SL_15-755_Official Service List _PUC |
| Casey | Jacobson | cjacobson@bepc.com | Basin Electric Power Cooperative | 1717 East Interstate Avenue Bismarck, ND 58501 | Electronic Service | No | OFF_SL_15-755_Official Service List _PUC |
| John S. | Jaffray | jjaffray@jrpowers.com | JJR Power | 350 Highway 7 Suite 236 Excelsior, MN 55331 | Electronic Service | No | OFF_SL_15-755_Official Service List _PUC |
| Nate | Jones | njones@hcpd.com | Heartland Consumers Power | PO Box 248 Madison, SD 57042 | Electronic Service | No | OFF_SL_15-755_Official Service List _PUC |
| Michael | Kampmeyer | mkampmeyer@a-e- group.com | AEG Group, LLC | 260 Salem Church Road Sunfish Lake, Minnesota 55118 | Electronic Service | No | OFF_SL_15-755_Official Service List _PUC |
| John | Kearney | jmkearney@MnSEIA.org | MnSEIA | 2512 33rd Ave S Minneapolis, MN 55406 | Electronic Service | No | OFF_SL_15-755_Official Service List _PUC |
| Kevin | Keene | kevin.keene@cummins.co m | | N/A | Electronic Service | No | OFF_SL_15-755_Official Service List _PUC |
| Jack | Kegel | jkegel@mmua.org | MMUA | 3025 Harbor Lane N Suite 400 Plymouth, MN 55447-5142 | Electronic Service | No | OFF_SL_15-755_Official Service List _PUC |
| Julie | Ketchum | N/A | Waste Management | 20520 Keokuk Ave Lakeville, MN 55044 | Paper Service | No | OFF_SL_15-755_Official Service List _PUC |
| | | | | | | | |

| First Name | Last Name | Email | Company Name | Address | Delivery Method | View Trade Secret | Service List Name |
|--------------|---------------|--------------------------------|--|--|--------------------|-------------------|---|
| Madeleine | Klein | mklein@socoreenergy.com | SoCore Energy | 225 W Hubbard Street Suite 200 Chicago, IL 60654 | Electronic Service | No | OFF_SL_15-755_Official Service List _PUC |
| Brad | Klein | bklein@elpc.org | Environmental Law & Policy Center | 35 E. Wacker Drive, Suite 1600 Suite 1600 Chicago, IL 60601 | Electronic Service | No | OFF_SL_15-755_Official Service List _PUC |
| John | Kluempke | jwkluempke@winlectric.com | Elk River Winlectric | 12777 Meadowvale Rd Elk River, MN 55330 | Electronic Service | No | OFF_SL_15-755_Official Service List _PUC |
| Jon | Kramer | jk2surf@aol.com | Sundial Solar | 4708 york ave. S Minneapolis, MN 55410 | Electronic Service | No | OFF_SL_15-755_Official Service List _PUC |
| Michael | Krause | michaelkrause61@yahoo.com | Kandiyo Consulting, LLC | 433 S 7th Street Suite 2025 Minneapolis, Minnesota 55415 | Electronic Service | No | OFF_SL_15-755_Official Service List _PUC |
| Jeffrey L. | Landsman | jlandsman@wheelerlaw.com | Wheeler, Van Sickle & Anderson, S.C. | 44 E. Mifflin Street, 10th Floor Madison, WI 53703 | Electronic Service | No | OFF_SL_15-755_Official Service List _PUC |
| Harold | LeVander, Jr. | hlevander@felhaber.com | Felhaber, Larson, Fenton & Vogt, P.A. | Suite 2100 444 Cedar Street St. Paul, MN 551012136 | Electronic Service | No | OFF_SL_15-755_Official Service List _PUC |
| Dean | Leischow | dean@sunriseenergyventures.com | Sunrise Energy Ventures | 601 Carlson Parkway, Suite 1050 Minneapolis, MN 55305 | Electronic Service | No | OFF_SL_15-755_Official Service List _PUC |
| Deborah Fohr | Levchak | N/A | Basin Electric Power Cooperative | 1717 East Interstate Avenue Bismarck, ND 585030564 | Paper Service | No | OFF_SL_15-755_Official Service List _PUC |

| First Name | Last Name | Email | Company Name | Address | Delivery Method | View Trade Secret | Service List Name |
|------------|------------|--------------------------------------|------------------------------------|---|--------------------|-------------------|---|
| John | Lindell | agorud.ecf@ag.state.mn.us | Office of the Attorney General-RUD | 1400 BRM Tower 445 Minnesota St St. Paul, MN 551012130 | Electronic Service | Yes | OFF_SL_15-755_Official Service List_PUC |
| Phillip | Lipetsky | greenenergyproductsllc@gmail.com | Green Energy Products | PO Box 108 Springfield, MN 56087 | Electronic Service | No | OFF_SL_15-755_Official Service List_PUC |
| Rebecca | Lundberg | rebecca.lundberg@powerfullygreen.com | Powerfully Green | 11451 Oregon Ave N Champlin, MN 55316 | Electronic Service | No | OFF_SL_15-755_Official Service List_PUC |
| Erica | McConnell | mcconnell@smwlaw.com | Shute, Mihaly & Weinberger LLP | 396 Hayes St San Francisco, California 94102-4421 | Electronic Service | No | OFF_SL_15-755_Official Service List_PUC |
| Sara G | McGrane | smcgrane@felhaber.com | Felhaber Larson | 220 S 6th St Ste 2200 Minneapolis, MN 55420 | Electronic Service | No | OFF_SL_15-755_Official Service List_PUC |
| Dave | McNary | David.McNary@hennepin.us | Hennepin County DES | 701 Fourth Ave S Ste 700 Minneapolis, MN 55415-1842 | Electronic Service | No | OFF_SL_15-755_Official Service List_PUC |
| John | McWilliams | jmm@dairy.net | Dairyland Power Cooperative | 3200 East Ave SPO Box 817 La Crosse, WI 54601-7227 | Electronic Service | No | OFF_SL_15-755_Official Service List_PUC |
| Thomas | Melone | Thomas.Melone@AllcoUS.com | Minnesota Go Solar LLC | 222 South 9th Street Suite 1600 Minneapolis, Minnesota 55120 | Electronic Service | No | OFF_SL_15-755_Official Service List_PUC |
| Stacy | Miller | stacy.miller@state.mn.us | Department of Commerce | State Energy Office 85 7th Place East, Suite 500 St. Paul, MN 55101 | Electronic Service | No | OFF_SL_15-755_Official Service List_PUC |
| Alan | Miller | N/A | | 2210 20th St NE Stewartville, MN 55976 | Paper Service | No | OFF_SL_15-755_Official Service List_PUC |

| First Name | Last Name | Email | Company Name | Address | Delivery Method | View Trade Secret | Service List Name |
|------------|-------------|-----------------------------|---|---|--------------------|-------------------|---|
| David | Moe | momentums@aol.com | | 2825 28th Ave S Minneapolis, MN 55406 | Electronic Service | No | OFF_SL_15-755_Official Service List _PUC |
| Darrick | Moe | darrick@mrea.org | Minnesota Rural Electric Association | 11640 73rd Avenue North Maple Grove, MN 55369 | Electronic Service | No | OFF_SL_15-755_Official Service List _PUC |
| David | Moeller | dmoeller@allete.com | Minnesota Power | 30 W Superior St Duluth, MN 558022093 | Electronic Service | No | OFF_SL_15-755_Official Service List _PUC |
| Dalene | Monsebroten | dalene@mncable.net | Northern Municipal Power Agency | 123 2nd St W Thief River Falls, MN 56701 | Electronic Service | No | OFF_SL_15-755_Official Service List _PUC |
| Andrew | Moratzka | andrew.moratzka@stoel.com | Stoel Rives LLP | 33 South Sixth St Ste 4200 Minneapolis, MN 55402 | Electronic Service | No | OFF_SL_15-755_Official Service List _PUC |
| Martin | Morud | mmorud@trunorthsolar.com | Tru North Solar | 5115 45th Ave S Minneapolis, MN 55417 | Electronic Service | No | OFF_SL_15-755_Official Service List _PUC |
| Ben | Nelson | | CMPMA | 459 South Grove Street Blue Earth, MN 56013 | Paper Service | No | OFF_SL_15-755_Official Service List _PUC |
| 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_15-755_Official Service List _PUC |
| Will | Nissen | nissen@fresh-energy.org | Fresh Energy | 408 St. Peter Street Ste 220 Saint Paul, MN 55102 | Electronic Service | No | OFF_SL_15-755_Official Service List _PUC |
| Michael | Noble | noble@fresh-energy.org | Fresh Energy | Hamm Bldg., Suite 220 408 St. Peter Street St. Paul, MN 55102 | Electronic Service | No | OFF_SL_15-755_Official Service List _PUC |

| First Name | Last Name | Email | Company Name | Address | Delivery Method | View Trade Secret | Service List Name |
|------------|-----------|----------------------------------|------------------------------------|--|--------------------|-------------------|--|
| Rolf | Nordstrom | rnordstrom@gpisd.net | Great Plains Institute | 2801 21ST AVE S STE 220 Minneapolis, MN 55407-1229 | Electronic Service | No | OFF_SL_15-755_Official Service List_PUC |
| Samantha | Norris | samanthanorris@alliantenergy.com | Interstate Power and Light Company | 200 1st Street SE PO Box 351 Cedar Rapids, IA 524060351 | Electronic Service | No | OFF_SL_15-755_Official Service List_PUC |
| Jeff | O'Neill | jeff.oneill@ci.monticello.mn.us | City of Monticello | 505 Walnut Street Suite 1 Monticello, Minnesota 55362 | Electronic Service | No | OFF_SL_15-755_Official Service List_PUC |
| Russell | Olson | rolson@hcpd.com | Heartland Consumers Power District | PO Box 248 Madison, SD 570420248 | Electronic Service | No | OFF_SL_15-755_Official Service List_PUC |
| Dan | Patry | dpatry@sunedison.com | SunEdison | 600 Clipper Drive Belmont, CA 94002 | Electronic Service | No | OFF_SL_15-755_Official Service List_PUC |
| Jeffrey C | Paulson | jeff.jcplaw@comcast.net | Paulson Law Office, Ltd. | 7301 Ohms Ln Ste 325 Edina, MN 55439 | Electronic Service | No | OFF_SL_15-755_Official Service List_PUC |
| John | Pendray | john.pendray@cummins.com | | N/A | Electronic Service | No | OFF_SL_15-755_Official Service List_PUC |
| Mary Beth | Peranteau | mperanteau@wheelerlaw.com | Wheeler Van Sickle & Anderson SC | 44 E. Mifflin Street, 10th Floor Madison, WI 53703 | Electronic Service | No | OFF_SL_15-755_Official Service List_PUC |
| Donna | Pickard | dpickardgsss@gmail.com | Citizen | 1215 Lilac Lane Excelsior, MN 55331 | Electronic Service | No | OFF_SL_15-755_Official Service List_PUC |
| 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_15-755_Official Service List_PUC |

| First Name | Last Name | Email | Company Name | Address | Delivery Method | View Trade Secret | Service List Name |
|------------|------------|------------------------------------|---------------------------------------|--|--------------------|-------------------|--|
| Gayle | Prest | gayle.prest@minneapolisn.gov | City of Mpls Sustainability | 350 South 5th St, #315 Minneapolis, MN 55415 | Electronic Service | No | OFF_SL_15-755_Official Service List_PUC |
| Mark | Rathbun | mrathbun@greenergy.com | Great River Energy | 12300 Elm Creek Blvd Maple Grove, MN 55369 | Electronic Service | No | OFF_SL_15-755_Official Service List_PUC |
| Michael | Reinertson | michael.reinertson@avantenergy.com | Avant Energy | 220 S. Sixth St. Ste 1300 Minneapolis, Minnesota 55402 | Electronic Service | No | OFF_SL_15-755_Official Service List_PUC |
| John C. | Reinhardt | | Laura A. Reinhardt | 3552 26Th Avenue South Minneapolis, MN 55406 | Paper Service | No | OFF_SL_15-755_Official Service List_PUC |
| Kevin | Reuther | kreuther@mncenter.org | MN Center for Environmental Advocacy | 26 E Exchange St, Ste 206 St. Paul, MN 551011667 | Electronic Service | No | OFF_SL_15-755_Official Service List_PUC |
| Craig | Rustad | crustad@minnkota.com | Minnkota Power | 1822 Mill Road PO Box 13200 Grand Forks, ND 582083200 | Electronic Service | No | OFF_SL_15-755_Official Service List_PUC |
| Robert K. | Sahr | bsahr@eastriver.coop | East River Electric Power Cooperative | P.O. Box 227 Madison, SD 57042 | Electronic Service | No | OFF_SL_15-755_Official Service List_PUC |
| Richard | Savelkoul | rsavelkoul@martinsquires.com | Martin & Squires, P.A. | 332 Minnesota Street Ste W2750 St. Paul, MN 55101 | Electronic Service | No | OFF_SL_15-755_Official Service List_PUC |
| Larry L. | Schedin | Larry@LLSResources.com | LLS Resources, LLC | 332 Minnesota St, Ste W1390 St. Paul, MN 55101 | Electronic Service | No | OFF_SL_15-755_Official Service List_PUC |
| Kenric | Scheevel | kjs@dairy.net | Dairyland Power Cooperative | 3200 East Avenue South PO Box 817 La Crosse, Wisconsin 54602 | Electronic Service | No | OFF_SL_15-755_Official Service List_PUC |

| First Name | Last Name | Email | Company Name | Address | Delivery Method | View Trade Secret | Service List Name |
|-------------|-------------|---------------------------------|--|--|--------------------|-------------------|--|
| Christopher | Schoenherr | cp.schoenherr@smmpa.org | SMMPA | 500 First Ave SW Rochester, MN 55902-3303 | Electronic Service | No | OFF_SL_15-755_Official Service List_PUC |
| Dean | Sedgwick | N/A | Itasca Power Company | PO Box 457 Bigfork, MN 56628-0457 | Paper Service | No | OFF_SL_15-755_Official Service List_PUC |
| David | Shaffer | shaff081@gmail.com | Minnesota Solar Energy Industries Project | 2952 Beechwood Ave Wayzata, MN 55391 | Electronic Service | No | OFF_SL_15-755_Official Service List_PUC |
| Doug | Shoemaker | dougs@mnRenewables.org | MRES | 2928 5th Ave S Minneapolis, MN 55408 | Electronic Service | No | OFF_SL_15-755_Official Service List_PUC |
| Mrg | Simon | mrgsimon@mrenergy.com | Missouri River Energy Services | 3724 W. Avera Drive P.O. Box 88920 Sioux Falls, SD 571098920 | Electronic Service | No | OFF_SL_15-755_Official Service List_PUC |
| Trevor | Smith | trevor.smith@avantenergy.com | Avant Energy, Inc. | 220 South Sixth Street Suite 1300 Minneapolis, Minnesota 55402 | Electronic Service | No | OFF_SL_15-755_Official Service List_PUC |
| Beth H. | Soholt | bsoholt@windonthewires.org | Wind on the Wires | 570 Asbury Street Suite 201 St. Paul, MN 55104 | Electronic Service | No | OFF_SL_15-755_Official Service List_PUC |
| Cary | Stephenson | cStephenson@otpc.com | Otter Tail Power Company | 215 South Cascade Street Fergus Falls, MN 56537 | Electronic Service | No | OFF_SL_15-755_Official Service List_PUC |
| Eric | Swanson | eswanson@winthrop.com | Winthrop Weinstine | 225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629 | Electronic Service | No | OFF_SL_15-755_Official Service List_PUC |
| Thomas P. | Sweeney III | tom.sweeney@easycleanenergy.com | Clean Energy Collective | P O Box 1828 Boulder, CO 80306-1828 | Electronic Service | No | OFF_SL_15-755_Official Service List_PUC |

| First Name | Last Name | Email | Company Name | Address | Delivery Method | View Trade Secret | Service List Name |
|------------|-----------|-----------------------------------|--|--|--------------------|-------------------|---|
| SaGonna | Thompson | Regulatory.records@xcelenergy.com | Xcel Energy | 414 Nicollet Mall FL 7 Minneapolis, MN 554011993 | Electronic Service | No | OFF_SL_15-755_Official Service List_PUC |
| Steve | Thompson | stevet@cmmpa.org | Central Minnesota Municipal Power Agency | 459 S Grove St Blue Earth, MN 56013-2629 | Electronic Service | No | OFF_SL_15-755_Official Service List_PUC |
| Pat | Treseler | pat.jcplaw@comcast.net | Paulson Law Office LTD | Suite 325 7301 Ohms Lane Edina, MN 55439 | Electronic Service | No | OFF_SL_15-755_Official Service List_PUC |
| Sam | Villella | sdvillella@gmail.com | | 10534 Alamo Street NE Blaine, MN 55449 | Electronic Service | No | OFF_SL_15-755_Official Service List_PUC |
| Roger | Warehime | warehimer@owatonnautilities.com | Owatonna Public Utilities | 208 South WalnutPO Box 800 Owatonna, MN 55060 | Electronic Service | No | OFF_SL_15-755_Official Service List_PUC |
| Paul | White | paul.white@prcwind.com | Project Resources Corp./Tamarac Line LLC/Ridgewind | 618 2nd Ave SE Minneapolis, MN 55414 | Electronic Service | No | OFF_SL_15-755_Official Service List_PUC |
| Jason | Willett | jason.willett@metc.state.mn.us | Metropolitan Council | 390 Robert St N Saint Paul, MN 55101-1805 | Electronic Service | No | OFF_SL_15-755_Official Service List_PUC |
| Daniel | Williams | DanWilliams.mg@gmail.com | Powerfully Green | 11451 Oregon Avenue N Champlin, MN 55316 | Electronic Service | No | OFF_SL_15-755_Official Service List_PUC |
| Randi | Winter | rwinter@felhaber.com | Felhaber Larson | Felhaber Larson 220 South Sixth Street, Suite 2200 Minneapolis, MN 55402 | Electronic Service | No | OFF_SL_15-755_Official Service List_PUC |
| Cam | Winton | cwinton@mnchamber.com | Minnesota Chamber of Commerce | 400 Robert Street North Suite 1500 St. Paul, Minnesota 55101 | Electronic Service | No | OFF_SL_15-755_Official Service List_PUC |

| First Name | Last Name | Email | Company Name | Address | Delivery Method | View Trade Secret | Service List Name |
|------------|-----------|-------------------------------|------------------------------------|--|--------------------|-------------------|---|
| Robyn | Woeste | robynwoeste@alliantenergy.com | Interstate Power and Light Company | 200 First St SE Cedar Rapids, IA 52401 | Electronic Service | No | OFF_SL_15-755_Official Service List_PUC |
| 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_15-755_Official Service List_PUC |
| Thomas J. | Zaremba | TZaremba@wheelerlaw.com | WHEELER, VAN SICKLE & ANDERSON | 44 E. Mifflin Street, 10th Floor Madison, WI 53703 | Electronic Service | No | OFF_SL_15-755_Official Service List_PUC |