

December 7, 2015

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

RE: **Supplemental Comments of the Minnesota Department of Commerce, Division of Energy Resources**
Docket No. G002/M-15-727

Dear Mr. Wolf:

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

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

The *Supplemental Filing* was filed on October 30, 2015. The petitioner on behalf of Xcel is:

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

To ensure that the record is complete in this docket, the Department provides the following response to Xcel's October 30, 2015 *Supplemental Filing*. The Department recommends that the Commission **accept** the Company's proposed level of demand entitlement and allow Xcel to recover associated demand costs through the monthly Purchased Gas Adjustment (PGA) effective November 1, 2015.

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

Sincerely,

/s/ MICHAEL N. ZAJICEK
Rates Analyst

MNZ/lt
Attachment

BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

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

DOCKET No. G002/M-15-727

I. BACKGROUND

Northern States Power Company (Xcel or the Company) filed a demand entitlement petition (*Petition*) on August 3, 2015 for the 2015-2016 heating season, with the Minnesota Public Utilities Commission (Commission). On September 11, 2015 the Minnesota Department of Commerce, Division of Energy Resources (Department) filed *Comments* in response to the Company's *Petition*. In its *Comments*, the Department supported the Company's *Petition* and recommended that the Commission approve the Company's proposed cost recovery and demand entitlement levels, subject to possible adjustment in the Company's November 1, 2015 supplemental filing.

On October 30, 2015, The Company filed its *Supplemental Filing* which showed the final demand entitlement volumes and costs that would be charged to ratepayers. The Company noted that there have been several changes to the firm transport entitlement levels since the original August 3, 2015 filing. The Department responds to the *Supplemental Filing* below.

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

The Company's *Supplemental Filing* lists one change to the demand entitlement levels and certain cost changes, as more fully discussed below. In addition, Xcel confirmed that it was able to obtain 12,428 dekatherms per day (Dth/day) of firm, winter-only capacity on Viking Gas Transmission (Viking) to supplement the Company's total design-day capacity as planned.

The Department offers the following analysis of the Company's *Supplemental Filing*.

A. *CHANGE IN XCEL'S RESERVE MARGIN*

Xcel's original plan for design-day resources included 46,000 Dth/day of peak-shaving capacity from the Sibley Propane Plant. However, in its *Supplemental Filing*, Xcel stated that the Company has determined that the plant will have limited reliable operating output above 19,200 Dth/day this heating season due to equipment malfunctions. Xcel stated that the Company explored the acquisition of additional transportation capacity to replace the reduction in peak shaving capacity, but Northern Natural Gas was unable to provide additional capacity to serve the system where the Sibley Propane Plant is located. As a result, this lowers Xcel's heating season reserve margin to 2.9 percent from the expected 6.2 percent margin indicated in the initial *Petition*. Xcel stated that even at this lower rate, the Company still has adequate resources to meet its design-day requirements for the upcoming heating season. Since additional transportation capacity was not available the Company proposed to reduce the reserve margin to 2.9 percent for the 2015-2016 heating season while it explores options to return the Sibley Propane Plant to full capacity for the 2016-2017 heating season.

Given these circumstances, and since Xcel's estimated design-day requirements are higher than the peak-day send-out in any of the past 10 years, the Department concludes that Xcel's proposed 2015-2016 reserve margin of 2.9 percent is not unreasonable.

B. *SUPPLIER ENTITLEMENT CHANGES*

Xcel increased its supplier entitlement charges to account for a firm supply transaction for 9,500 Dth/day to address peak-day needs at Chisago, an increase of \$54,000 over the costs contemplated in the initial *Petition*. In response to Department information requests, Xcel stated that this additional supply transaction was purchased to partially mitigate the Sibley Plant limitation.¹ The Department concludes that Xcel's proposed supplier entitlement changes are reasonable.

C. *HEDGING TRANSACTIONS*

The Company provided updated hedging transactions, showing that five call options were executed for the 2015-2016 heating season, covering the Company's entire targeted supply quantity. Xcel stated that two hedging transactions reported in the initial *Petition* were incorrect and that the revised transactions listed in the *Supplemental Filing* are correct. The Department will not comment on these hedging transactions here, as our analysis will be included in a future Annual Automatic Adjustment Report.

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

Xcel proposed to reflect the costs associated with its proposed demand entitlements in the purchased gas adjustment (PGA) effective November 1, 2015. The demand entitlements in Xcel's Trade Secret Revised Attachment 2, Schedule 1, Page 1 of 2, represent the demand

¹ See Attachment 1.

entitlements for which the Company's firm customers will pay. Department Attachment 1 compares the October 2015 PGA costs to the November 2015 PGA costs for several customer classes. The resulting per-Dth cost changes related strictly to changes in demand costs have the following annual rate effects.

- Annual demand costs decrease by \$0.0145/Dth, or approximately \$1.26 annually, for the average Residential customer consuming 87 Dth annually;
- Annual demand costs decrease by \$0.0146/Dth, or approximately \$4.15 annually, for the average Small Commercial customer consuming 284 Dth annually;
- Annual demand costs decrease by \$0.0144/Dth, or approximately \$21.06 annually, for the average Large Commercial customer consuming 1463 Dth annually; and
- No Change in annual demand costs for the average Small Interruptible, Medium Interruptible, and Large Interruptible customers. These customer classes are not allocated demand costs under the current cost allocation plan.

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

III. THE DEPARTMENT'S RECOMMENDATIONS

The Department recommends that the Commission:

- Approve Xcel's proposed level of demand entitlements as amended by its *Supplemental Filing*; and
- Allow Xcel to recover associated demand costs through the monthly Purchased Gas Adjustment effective November 1, 2015.

/lt

Docket No. G002/M-15-727
Demand Entitlement Analysis-Minneosta Jurisdiction
DOC Attachment 1

Northern States Power Company d/b/a Xcel Energy

Heating Season	Number of Firm Customers			Design-Day Requirement			Total Entitlement Plus Peak Shaving			Reserve Margin	
	(1) Number of Customers	(2) Change from Previous Year	(3) % Change From Previous Year	(4) Design Day (Dth)	(5) Change from Previous Year	(6) % Change From Previous Year	(7) Total Design-Day Capacity (Dth)	(8) Change from Previous Year	(9) % Change From Previous Year	(10) Reserve Margin	(11) % of Reserve [(7)-(4)]/(4)
2015-2016**	450,630	4,349	0.97%	717,478	1,533	0.21%	738,570	(18,348)	-2.42%	21,092	2.94%
2014-2015**	446,281	4,708	1.07%	715,945	9,010	1.27%	756,918	7,593	1.01%	40,973	5.72%
2013-2014**	441,573	2,363	0.54%	706,935	4,776	0.68%	749,325	4,078	0.55%	42,390	6.00%
2012-2013**	439,210	155	0.04%	702,159	(135)	-0.02%	745,247	153	0.02%	43,088	6.14%
2011-2012**	439,055	2,461	0.56%	702,294	2,683	0.38%	745,094	1,313	0.18%	42,800	6.09%
2010-2011**	436,594	2,896	0.67%	699,611	5,124	0.74%	743,781	(4,486)	-0.60%	44,170	6.31%
2009-2010**	433,698	4,846	1.13%	694,487	9,482	1.38%	748,267	15,976	2.18%	53,780	7.74%
2008-2009**	428,852	(2,651)	-0.61%	685,005	1,288	0.19%	732,291	10,785	1.49%	47,286	6.90%
2007-2008**	431,503	7,088	1.67%	683,717	5,984	0.88%	721,506	25,249	3.63%	37,789	5.53%
2006-2007	424,415	2,845	0.67%	677,733	6,887	1.03%	696,257	4,568	0.66%	18,524	2.73%
2005-2006	421,570	10,584	2.58%	670,846	21,191	3.26%	691,689	16,569	2.45%	20,843	3.11%
2004-2005	410,986	9,353	2.33%	649,655	46,187	7.65%	675,120	31,805	4.94%	25,465	3.92%
2003-2004	401,633	5,826	1.47%	603,468	(4,388)	-0.72%	643,315	1,040	0.16%	39,847	6.60%
2002-2003	395,807			607,856			642,275			34,419	5.66%
Average:			1.00%			1.41%			1.42%		5.56%

Heating Season	Firm Peak-Day Sendout			Excess per Customer [(7) - (4)]/(1)	Design Day per Customer (4)/(1)	Entitlement per Customer (7)/(1)	Peak-Day Send per Customer (12)/(1)
	(12) Firm Peak-Day Sendout (Dth)	(13) Change from Previous Year	(14) % Change From Previous Year				
2015-2016**	NA			0.0468	1.5922	1.6390	NA
2014-2015**	687,501	(2,489)	-0.36%	0.0918	1.6042	1.6961	1.5405
2013-2014**	689,990	243	0.04%	0.0960	1.6009	1.6969	1.5626
2012-2013**	689,747	30,484	4.62%	0.0981	1.5987	1.6968	1.5704
2011-2012**	659,263	(16,314)	-2.41%	0.0975	1.5996	1.6970	1.5015
2010-2011	675,577	84,646	14.32%	0.1012	1.6024	1.7036	1.5474
2009-2010	590,931	(10,494)	-1.74%	0.1240	1.6013	1.7253	1.3625
2008-2009	601,425	15,551	2.65%	0.1103	1.5973	1.7076	1.4024
2007-2008	585,874	16,911	2.97%	0.0876	1.5845	1.6721	1.3578
2006-2007	568,963	31,303	5.82%	0.0436	1.5969	1.6405	1.3406
2005-2006	537,660	286	0.05%	0.0494	1.5913	1.6407	1.2754
2004-2005	537,374	(23,876)	-4.25%	0.0620	1.5807	1.6427	1.3075
2003-2004	561,250	26,865	5.03%	0.0992	1.5025	1.6017	1.3974
2002-2003	534,385			0.0870	1.5357	1.6227	1.3501
Average			2.71%	0.0880	1.5827	1.6706	1.4012

*-Some numbers may differ from Xcel Attachments due to rounding

**-Reflects the UPC DD method.

Demand Entitlement--PGA Cost Recovery Analysis
DOC Attachment 2

	Last Rate Case (G002/GR-09- 1153)	Last Approved Demand Change (G002/M-14- 654)	Last Month PGA: October (7/1/15)	Nov 2015 PGAs with Proposed Demand Entitlement Changes	Change From Last Rate Case	Change From Last Approved Demand Change	Percent Change (%) From July PGA	Change (\$) From July PGA
Residential								
Commodity Cost of Gas (WACOG)	\$5.5042	\$4.4493	\$2.7897	\$2.8402	-48.40%	-36.17%	1.81%	\$0.0505
Demand Cost of Gas (1)	\$0.9008	\$0.8349	\$0.8365	\$0.8220	-8.75%	-1.55%	-1.73%	(\$0.0145)
Distribution Margin	\$1.8591	\$1.8591	\$1.8591	\$1.8591	0.00%	0.00%	0.00%	\$0.0000
Total per Dth Cost	\$8.2641	\$7.1433	\$5.4853	\$5.5213	-33.19%	-22.71%	0.66%	\$0.0360
Average Annual Usage (Dk)	87	87	87	87				
Average Annual Total Cost	\$718.60	\$621.14	\$476.97	\$480.10	-33.19%	-22.71%	0.66%	\$3.13
Average Annual Total Demand Cost of Gas	\$78.33	\$72.60	\$72.74	\$71.48			Current Allocation	(\$1.26)

	Last Rate Case (G002/GR-09- 1153)	Last Approved Demand Change (G002/M-14- 654)	Last Month PGA: October (7/1/15)	Nov 2015 PGAs with Proposed Demand Entitlement Changes	Change From Last Rate Case	Change From Last Approved Demand Change	Percent Change (%) From July PGA	Change (\$) From July PGA
Small Commercial								
Commodity Cost of Gas (WACOG)	\$5.4871	\$4.4493	\$2.7897	\$2.8402	-48.24%	-36.17%	1.81%	\$0.0505
Demand Cost of Gas (1)	\$0.8984	\$0.8381	\$0.8400	\$0.8254	-8.13%	-1.52%	-1.74%	(\$0.0146)
Distribution Margin	\$1.2331	\$1.2331	\$1.2331	\$1.2331	0.00%	0.00%	0.00%	\$0.0000
Total per Dth Cost	\$7.6186	\$6.5205	\$4.8628	\$4.8987	-35.70%	-24.87%	0.74%	\$0.0359
Average Annual Usage (Dk)	284	284	284	284				
Average Annual Total Cost	\$2,163.87	\$1,851.99	\$1,381.16	\$1,391.35	-35.70%	-24.87%	0.74%	\$10.20
Average Annual Total Demand Cost of Gas	\$255.17	\$238.04	\$238.58	\$234.43			Current Allocation	(\$4.15)

	Last Rate Case (G002/GR-09- 1153)	Last Approved Demand Change (G002/M-14- 654)	Last Month PGA: October (7/1/15)	Nov 2015 PGAs with Proposed Demand Entitlement Changes	Change From Last Rate Case	Change From Last Approved Demand Change	Percent Change (%) From July PGA	Change (\$) From July PGA
Large Commercial								
Commodity Cost of Gas (WACOG)	\$5.4871	\$4.4493	\$2.7897	\$2.8402	-48.24%	-36.17%	1.81%	\$0.0505
Demand Cost of Gas (1)	\$0.8917	\$0.8200	\$0.8243	\$0.8099	-9.17%	-1.23%	-1.75%	(\$0.0144)
Distribution Margin	\$1.2315	\$1.2315	\$1.2315	\$1.2315	0.00%	0.00%	0.00%	\$0.0000
Total per Dth Cost	\$7.6103	\$6.5008	\$4.8455	\$4.8816	-35.86%	-24.91%	0.75%	\$0.0361
Average Annual Usage (Dk)	1,463	1,463	1,463	1,463				
Average Annual Total Cost	\$11,131.14	\$9,508.33	\$7,087.23	\$7,140.04	-35.86%	-24.91%	0.75%	\$52.80
Average Annual Total Demand Cost of Gas	\$1,304.24	\$1,199.36	\$1,205.65	\$1,184.59			Current Allocation	(\$21.06)

	Last Rate Case (G002/GR-09- 1153)	Last Approved Demand Change (G002/M-14- 654)	Last Month PGA: October (7/1/15)	Nov 2015 PGAs with Proposed Demand Entitlement Changes	Change From Last Rate Case	Change From Last Approved Demand Change	Percent Change (%) From July PGA	Change (\$) From July PGA
Small Interruptible								
Commodity Cost of Gas (WACOG)	\$5.4926	\$4.4493	\$2.7897	\$2.8402	-48.29%	-36.17%	1.81%	\$0.0505
Demand Cost of Gas (1)	\$0.0000	\$0.0000	\$0.0000	\$0.0000	NA	NA	NA	\$0.0000
Distribution Margin	\$0.9635	\$0.9635	\$0.9635	\$0.9635	0.00%	0.00%	0.00%	\$0.0000
Total per Dth Cost	\$6.4561	\$5.4128	\$3.7532	\$3.8037	-41.08%	-29.73%	1.35%	\$0.0505
Average Annual Usage (Dk)	7,936	7,936	7,936	7,936				
Average Annual Total Cost	\$51,235.93	\$42,955.98	\$29,785.71	\$30,186.48	-41.08%	-29.73%	1.35%	\$400.77
Average Annual Total Demand Cost of Gas	\$0.00	\$0.00	\$0.00	\$0.00			Current Allocation	\$0.00

Demand Entitlement--PGA Cost Recovery Analysis

DOC Attachment 2

	Last Rate Case (G002/GR-09- 1153)	Last Approved Demand Change (G002/M-14- 654)	Last Month PGA: October (7/1/15)	Nov 2015 PGAs with Proposed Demand Entitlement Changes	Change From Last Rate Case	Change From Last Approved Demand Change	Percent Change (%) From July PGA	Change (\$) From July PGA
Medium Interruptible								
Commodity Cost of Gas (WACOG)	\$5.4696	\$4.4493	\$2.7897	\$2.8402	-48.07%	-36.17%	1.81%	\$0.0505
Demand Cost of Gas (1)	\$0.0000	\$0.0000	\$0.0000	\$0.0000	NA	NA	NA	\$0.0000
Distribution Margin	\$0.4751	\$0.4751	\$0.4751	\$0.4751	0.00%	0.00%	0.00%	\$0.0000
Total per Dth Cost	\$5.9447	\$4.9244	\$3.2648	\$3.3153	-44.23%	-32.68%	1.55%	\$0.0505
Average Annual Usage (Dk)	64,709	64,709	64,709	64,709				
Average Annual Total Cost	\$384,676.89	\$318,653.00	\$211,263.24	\$214,531.04	-44.23%	-32.68%	1.55%	\$3,267.80
Average Annual Total Demand Cost of Gas	\$0.00	\$0.00	\$0.00	\$0.00				Current Allocation \$0.00

	Last Rate Case (G002/GR-09- 1153)	Last Approved Demand Change (G002/M-14- 654)	Last Month PGA: October (7/1/15)	Nov 2015 PGAs with Proposed Demand Entitlement Changes	Change From Last Rate Case	Change From Last Approved Demand Change	Percent Change (%) From July PGA	Change (\$) From July PGA
Large Interruptible								
Commodity Cost of Gas (WACOG)	\$5.5501	\$4.4493	\$2.7897	\$2.8402	-48.83%	-36.17%	1.81%	\$0.0505
Demand Cost of Gas (1)	\$0.0000	\$0.0000	\$0.0000	\$0.0000	NA	NA	NA	\$0.0000
Distribution Margin	\$0.4346	\$0.4346	\$0.4346	\$0.4346	0.00%	0.00%	0.00%	\$0.0000
Total per Dth Cost	\$5.9847	\$4.8839	\$3.2243	\$3.2748	-45.28%	-32.95%	1.57%	\$0.0505
Average Annual Usage (Dk)	745,979	745,979	745,979	745,979				
Average Annual Total Cost	\$4,464,438.14	\$3,643,286.84	\$2,405,267.55	\$2,442,939.49	-45.28%	-32.95%	1.57%	\$37,671.94
Average Annual Total Demand Cost of Gas	\$0.00	\$0.00	\$0.00	\$0.00				Current Allocation \$0.00

(1) Does not include demand smoothing

(2) WACOG held constant to isolate price changes related solely to demand changes.

Current Allocation

Summary	Commodity Change (\$/Dk)	Commodity Change (Percent)	Demand Change (\$/Dk)	Demand Change (Percent)	Demand Annual Change (\$/Dk)	Total Annual Change (\$/Dk)	Total Annual Change (Percent)
Change from most recent PGA							
Customer Class							
Residential	\$0.0505	1.81%	-\$0.0145	-1.73%	(\$1.26)	\$3.13	0.66%
Small Commercial	\$0.0505	1.81%	-\$0.0146	-1.74%	(\$4.15)	\$10.20	0.74%
Large Commercial	\$0.0505	1.81%	-\$0.0144	-1.75%	(\$21.06)	\$52.80	0.75%
Small Interruptible	\$0.0505	1.81%	\$0.0000	NA	\$0.00	\$400.77	1.35%
Medium Interruptible	\$0.0505	1.81%	\$0.0000	NA	\$0.00	\$3,267.80	1.55%
Large Interruptible	\$0.0505	1.81%	\$0.0000	NA	\$0.00	\$37,671.94	1.57%

CERTIFICATE OF SERVICE

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

**Minnesota Department of Commerce
Supplemental Comments**

Docket No. G002/M-15-727

Dated this 7th day of December 2015

/s/Sharon Ferguson

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Tamie A.	Aberle	tamie.aberle@mdu.com	Great Plains Natural Gas Co.	400 North Fourth Street Bismarck, ND 585014092	Electronic Service	No	OFF_SL_15-727_M-15-727
Kristine	Anderson	kanderson@greatermngas.com	Greater Minnesota Gas, Inc.	202 S. Main Street Le Sueur, MN 56058	Electronic Service	No	OFF_SL_15-727_M-15-727
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_15-727_M-15-727
Christopher	Anderson	canderson@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022191	Electronic Service	No	OFF_SL_15-727_M-15-727
Alison C	Archer	alison.c.archer@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 5 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_15-727_M-15-727
Gail	Baranko	gail.baranko@xcelenergy.com	Xcel Energy	414 Nicollet Mall 7th Floor Minneapolis, MN 55401	Electronic Service	No	OFF_SL_15-727_M-15-727
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_15-727_M-15-727
Robert S.	Carney, Jr.			4232 Colfax Ave. S. Minneapolis, MN 55409	Paper Service	No	OFF_SL_15-727_M-15-727
George	Crocker	gwillc@nawo.org	North American Water Office	PO Box 174 Lake Elmo, MN 55042	Electronic Service	No	OFF_SL_15-727_M-15-727
Jeffrey A.	Daugherty	jeffrey.daugherty@centerpointenergy.com	CenterPoint Energy	800 LaSalle Ave Minneapolis, MN 55402	Electronic Service	No	OFF_SL_15-727_M-15-727

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Ian	Dobson	ian.dobson@ag.state.mn.us	Office of the Attorney General-RUD	Antitrust and Utilities Division 445 Minnesota Street, BRM Tower St. Paul, MN 55101	Electronic Service 1400	No	OFF_SL_15-727_M-15-727
Rebecca	Eilers	rebecca.d.eilers@xcelenergy.com	Xcel Energy	414 Nicollet Mall, 7th Floor Minneapolis, MN 55401	Electronic Service	No	OFF_SL_15-727_M-15-727
Emma	Fazio	emma.fazio@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_15-727_M-15-727
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_15-727_M-15-727
Edward	Garvey	garveyed@aol.com	Residence	32 Lawton St Saint Paul, MN 55102	Electronic Service	No	OFF_SL_15-727_M-15-727
Benjamin	Gerber	bgerber@mnchamber.com	Minnesota Chamber of Commerce	400 Robert Street North Suite 1500 St. Paul, Minnesota 55101	Electronic Service	No	OFF_SL_15-727_M-15-727
Todd J.	Guerrero	todd.guerrero@kutakrock.com	Kutak Rock LLP	Suite 1750 220 South Sixth Street Minneapolis, MN 554021425	Electronic Service	No	OFF_SL_15-727_M-15-727
Annete	Henkel	mui@mutilityinvestors.org	Minnesota Utility Investors	413 Wacouta Street #230 St. Paul, MN 55101	Electronic Service	No	OFF_SL_15-727_M-15-727
Sandra	Hofstetter	N/A	MN Chamber of Commerce	7261 County Road H Fremont, WI 54940-9317	Paper Service	No	OFF_SL_15-727_M-15-727
Michael	Hoppe	il23@mtn.org	Local Union 23, I.B.E.W.	932 Payne Avenue St. Paul, MN 55130	Electronic Service	No	OFF_SL_15-727_M-15-727

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Richard	Johnson	Rick.Johnson@lawmoss.com	Moss & Barnett	150 S. 5th Street Suite 1200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_15-727_M-15-727
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_15-727_M-15-727
Nicolle	Kupser	nkupser@greatermngas.com	Greater Minnesota Gas, Inc.	202 South Main Street P.O. Box 68 Le Sueur, MN 56058	Electronic Service	No	OFF_SL_15-727_M-15-727
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_15-727_M-15-727
Eric	Lipman	eric.lipman@state.mn.us	Office of Administrative Hearings	PO Box 64620 St. Paul, MN 551640620	Paper Service	Yes	OFF_SL_15-727_M-15-727
Matthew P	Loftus	matthew.p.loftus@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 5 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_15-727_M-15-727
Pam	Marshall	pam@energycents.org	Energy CENTS Coalition	823 7th St E St. Paul, MN 55106	Electronic Service	No	OFF_SL_15-727_M-15-727
Mary	Martinka	mary.a.martinka@xcelenergy.com	Xcel Energy Inc	414 Nicollet Mall 7th Floor Minneapolis, MN 55401	Electronic Service	No	OFF_SL_15-727_M-15-727
David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022093	Electronic Service	No	OFF_SL_15-727_M-15-727
Andrew	Moratzka	apmoratzka@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_15-727_M-15-727

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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_15-727_M-15-727
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_15-727_M-15-727
Greg	Palmer	gpalmer@greatermngas.com	Greater Minnesota Gas, Inc.	PO Box 68 202 South Main Street Le Sueur, MN 56058	Electronic Service	No	OFF_SL_15-727_M-15-727
Richard	Savelkoul	rsavelkoul@martinsquires.com	Martin & Squires, P.A.	332 Minnesota Street Ste W2750 St. Paul, MN 55101	Electronic Service	No	OFF_SL_15-727_M-15-727
Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates	Ste 122 9100 W Bloomington Frwy Bloomington, MN 55431	Electronic Service	No	OFF_SL_15-727_M-15-727
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_15-727_M-15-727
SaGonna	Thompson	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_15-727_M-15-727
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_15-727_M-15-727
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_15-727_M-15-727