MINNESOTA DEPARTMENT OF COMMERCE

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July 16, 2014

Burl W. Haar
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, Minnesota 55101-2147

RE: **Comments of the Minnesota Department of Commerce, Division of Energy Resources**
Docket No. G008/M-14-368

Dear Dr. Haar:

Attached are the *Comments* of the Minnesota Department of Commerce, Division of Energy Resources (Department), in the following matter:

CenterPoint Energy's (CenterPoint) 2013 Demand Side Management Financial Incentive, Conservation Improvement Program Tracker Report, and Conservation Cost Recovery Adjustment Aggregated Compliance Filing (*Petition*).

The *Petition* was filed on May 1, 2014 by:

Audrey C. Peer
Regulatory Analyst, Conservation Improvement Programs
CenterPoint Energy, a Division of CenterPoint Energy Resources Corp.
800 LaSalle Avenue
PO Box 59038
Minneapolis, Minnesota 55459-0038

As discussed in greater detail in the attached *Comments*, the Department recommends that the Minnesota Public Utilities Commission (Commission) **approve CenterPoint's *Petition* with modifications** and **discontinue** allowing the recovery of carrying charges for under or over recovered balances in CenterPoint's CIP tracker account. The Department is available to answer any questions that the Commission may have in this matter.

Sincerely,

/s/ MICHAEL N. ZAJICEK
Rates Analyst

MNZ/lt
Attachment

BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

COMMENTS OF THE
MINNESOTA DEPARTMENT OF COMMERCE
DIVISION OF ENERGY RESOURCES

DOCKET NO. G008/M-14-368

## I. SUMMARY OF THE UTILITY'S FILING

On May 1, 2014, CenterPoint Energy, a Division of CenterPoint Energy Resources Corporation (CenterPoint, CPE, or the Company), submitted a filing (*Petition*) to the Minnesota Public Utilities Commission (Commission or MPUC) in the present docket. The Company's *Petition* included:

- a proposed 2012 Demand Side Management (DSM) financial incentive of $10,890,131;

- a report of proposed recovery and expenditures in its Conservation Improvement Program (CIP) tracker account during 2013; and

- a proposed change to the Conservation Cost Recovery Adjustment (CCRA).

In addition, Section I of the *Petition* contained the Company's 2013 *Status Report*. Since the *Status Report* does not require Commission approval, that portion of the *Petition* has been assigned a separate docket number.[1]

The Minnesota Department of Commerce, Division of Energy Resources (Department or DOC) provides its analysis and recommendations below.

## II. THE DEPARTMENT'S ANALYSIS

The Department's analysis of CPE's *Petition* is presented below in the following sections:

- in Section II.A, CenterPoint's proposed 2013 DSM financial incentive;
- in Section II.B, CenterPoint's proposed 2013 CIP tracker account;

[1] See Docket No. G008/CIP-09-644.04.

- in Section II.C, CenterPoint's CCRA proposal;
- in Section II.D, a review of CenterPoint's CIP activities for the period 2009 through 2013; and
- in Section II.E, the Department's proposal to standardize utility filings.

*A. CPE'S PROPOSED 2013 DSM FINANCIAL INCENTIVE*

*1. Background and Summary of CPE's Proposed 2013 DSM Financial Incentive*

Under the Shared Savings DSM financial incentive plan approved by the Commission in Docket No. E,G999/CI-08-133, CenterPoint may request Commission approval of a performance bonus based on the percent of net benefits that the Company achieves. The Commission's January 27, 2010 Order explains the incentive as follows:

> The New Shared Savings approach emphasizes a 1.5 percent energy savings goal, and ties the incentive earned by the utility to pursuit of the 1.5 percent savings goal. The new approach sets a specific dollar amount per unit of energy saved that each utility will earn at energy savings equal to 1.5 percent of annual non-CIP exempt retail sales. That is referred to as the incentive calibration.
>
> The higher the calibration, the higher the incentive will be at all energy savings levels after the threshold. Specifically, each utility's incentive is calibrated so that when the utility achieves energy savings equal to 1.5 percent of retail sales, electric utilities will earn an incentive equal to \$0.09 times the number of kWh saved[2] and gas utilities will earn at a range from \$4.50 to \$6.50 times the number of thousand cubic feet (Mcfs) saved.
>
> Importantly, the incremental incentive per additional energy savings achieved is higher than the average incentive achieved. Thus, the closer the energy savings is to reaching the 1.5 percent energy savings goal, the greater the incremental incentive. However, the incentive is still less than the net benefits created through the savings, therefore reserving a majority of the net benefits for ratepayers.
>
> Mandated assessments to utilities will not be included in the calculation of net benefits. Further, as agreed to by the working group, a utility can elect before the beginning of each year whether to include third party programs in its incentive

[2] This calibration was modeled to result in a utility receiving an incentive at historical levels when historical energy savings are achieved.

> calculation. The costs and benefits of non-elected third party programs will not be included in the calculation.

Under the revised shared savings DSM financial incentive plan approved by the Commission,[3] CenterPoint may request Commission approval of a performance incentive based on the percent of net benefits that the Company achieves under its approved CIP. The plan links the incentive to the Company's performance in achieving cost effective conservation.

With respect to net benefits, CenterPoint provided in its *Petition* the benefit-cost results of the revenue requirements test associated with the Company's 2013 CIP. According to the Company, CPE's 2013 CIP activities resulted in an estimated $89,196,049 of net benefits. CenterPoint also stated that its CIP activities achieved energy savings in 2013 of 1,584,019 Mcf. Normally this would have resulted in an incentive amount of $14,820,999, however there is a cap on the financial incentive of $6.875 per Mcf saved, and thus based on the terms and conditions of its approved DSM incentive plan, CPE requested recovery of a revised DSM financial incentive of $10,890,131.

*2. The Department's Review of CPE's Proposed 2013 DSM Financial Incentive*

The Department's CIP Engineering Staff review of the Company's claimed demand and energy savings that underpin CenterPoint's proposed DSM financial incentive is on-going. In all likelihood, it will not be completed before the fall of 2014. This lag between the Company's request for recovery of the incentive and completion of the Department CIP Engineering Staff review is a recurring phenomenon. In its review of CenterPoint's 2012 DSM financial incentive filing[4] the Department compensated for this lag by simply assuming CPE's claimed energy savings for 2012 were correct as filed and planned to make, in the instant docket, any adjustments approved by the Deputy Commissioner of the Department. However, the Deputy Commissioner accepted CenterPoint's 2012 Status Report without any adjustments[5] and thus none need to be made in the instant docket.

As was done last year, the Department's analysis assumes that CenterPoint's claimed 2013 energy savings are correct as filed. If the Deputy Commissioner of the Department subsequently approves changes to CenterPoint's energy savings claims that impact either recovery of CIP budgets or levels of Shared Savings DSM financial incentives, those changes can be incorporated in the Company's 2014 filing that will be made April 30, 2015. CenterPoint's reported gas energy savings level is $1,584,019 Mcf, in the Company's 2013 *Petition*. The Department used the 1,584,019 Mcf energy savings in its review in this docket.

[3] See Docket No. E,G999/CI-08-133.
[4] Docket No. G008/M-13-373.
[5] Docket No. G008/CIP-09-644.04

According to the revised incentive calculation in CenterPoint's *Petition*, the Company receives approximately 1.72989 percent of the net benefits created by its 2013 CIP investments for every 0.1 percent of sales saved above 0.1 percent. CenterPoint estimated that it achieved energy savings of 1.16 percent of its three-year average sales from the Company's 2013-2015 Triennial Plan. Thus, CenterPoint's 2013 DSM financial incentive would normally be 16.6% of the achieved net benefits, or $14,820,999 however, as stated previously, there is a cap on the financial incentive of $6.875 per Mcf saved, and thus based on the terms and conditions of its approved DSM incentive plan, CPE requested recovery of a revised DSM financial incentive of $10,890,131. Consequently, the Department recommends approval of an incentive of $10,890,131 for CenterPoint's 2013 CIP achievements.

### *3. The DOC's Overall Recommendation Concerning CenterPoint's 2013 DSM Financial Incentive*

The Department recommends that the Commission approve CenterPoint's proposed 2013 DSM financial incentive of $10,890,131 to be included in the Company's CIP tracker account no sooner than the issue date of the Commission's *Order* in the present docket.

## *B. CENTERPOINT'S 2013 CIP TRACKER ACCOUNT*

### *1. Overall 2013 CIP Tracker Account*

During its analysis the Department discovered that the Company incorrectly calculated the CIP tracker balance due to an apparent arithmetic error that incorrectly summed the total recovery via base rates and the CCRA for the month of January 2013. The Company responded that this apparent error was actually the result of misalignment of the CenterPoint's billing Cycle with the January 1st effective date, and thus $279,687 was not recovered to represent so as to change the customer's rate only one rate during each billing period. Thus the Company correctly reported a year-end CIP Tracker balance of $8,501,064. Table 1 below provides a summary of the activity in the Company's CIP tracker account during 2013 including the adjustment for unrecovered CCRA due to the misalignment of the Company's billing cycle.

**Table 1: Summary of CenterPoint's CIP Tracker Account in 2013**

| Description | Time Period | Amount |
|---|---|---|
| Beginning Balance | December 31, 2012 | $ 14,225,552 |
| CIP Expenses | January 1 through December 31, 2013 | $23,222,379 |
| 2012 DSM Financial Incentive | Approved in December 2013 | $3,207,411 |
| Carrying Charges | January 1 through December 31, 2013 | $344,598 |
| Unrecovered CCRA due to billing dates | January 1 through December 31, 2013 | $279,687 |
| Recovery via Base Rates | January 1 through December 31, 2013 | ($9,581,055) |
| Interim Recovery Rate | October 1 through December 31, 2013 | ($4,269,471) |
| Recovery via CCRA[6] | January 1 through December 31, 2013 | ($18,928,037) |
| Ending Balance | December 31, 2013 | $8,501,064 |

### *2. The Department's Overall Recommendation Concerning CenterPoint's 2013 CIP Tracker Account*

The Department recommends that the Commission approve CenterPoint's 2013 CIP tracker account as presented in Table 1.

## *C. CENTERPOINT'S PROPOSED CCRA*

Minnesota law states in relevant part that the Commission "may permit a public utility to file rate schedules providing for annual recovery of the costs of energy conservation improvements."[7] This annual CIP recovery mechanism is generally referred to as the Conservation Cost Recovery Adjustment (CCRA). In addition, in the Company's 2008 rate case proceeding, the Commission allowed CenterPoint to include in base rates a Conservation Cost Recovery Charge (CCRC) of 0.00644 per therm.[8] On August 2, 2013 the Company filed a new rate case in Docket No. G008/GR-13-316, for which interim rates went into effect on October 1, 2013 resulting in a new CCRC of $0.01866 per therm, or an increase of $0.01222 per therm.

In the present docket, CenterPoint requests Commission approval of a CCRA of $0.00884 per therm, to be effective January 1, 2015. The Company notes that this CCRA would not result in the complete recovery of the CIP Tracker balance, but argues that to avoid rate shock the CCRA rate should not be set at the rate at which the tracker balance would be fully recovered. The Department notes that during its analysis an error was discovered in CenterPoint's projected CCRA recovery during January of 2014 and 2015. The Company provided corrected tables upon request.

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[6] The 2013 CCRA recovery total is total recovery net refunds to CCRA-exempt customers.
[7] See Minn. Stat. §216B.16, subd. 6b(c).
[8] See Docket No. G008/GR-08-1075.

Table 2 below summarizes the calculation of CenterPoint's CCRA without the Company's requested adjustment to mitigate rate shock.[9] The Department notes that since this proposed CCRA is intended to be in effect during the 2015 calendar year its calculation requires a projection of the CIP tracker balance through the end of 2014.

**Table 2: Summary of CenterPoint's CCRA[10]**

| Description | Amount |
|---|---|
| Estimated CIP Tracker Account Balance as of December 31, 2014 | $ 6,335,225 |
| Actual and Estimated CIP Expenses – January – December 2015 | $25,569,528 |
| Actual and Estimated Carrying Charges – January - December 2015 | ($350,125)[11] |
| Actual and Est. Base Rate Recoveries – January – December 2015 | ($24,892,687) |
| Estimated CIP Tracker Account Balance as of December 31, 2015 | $6,661,941 |
| Proposed 2015 DSM Financial Incentive | $8,506,837 |
| Total Estimated CIP Tracker Account Balance as of December 31, 2015 | $15,168,778 |
| Projected Sales less CIP-exempt Sales (Dth)[12] | 133,401,329 |
| Proposed CCRA ($/Dth) | $0.1137 |

As shown in Table 2 the CCRA required to zero out the CIP Tracker Balance as of January 1, 2016 would be $0.01137 per therm, or $0.0025 per therm higher than the Company's proposed CCRA of $0.00884 per therm.

The Department notes that retaining large CIP tracker balances allows the Company to recover high carrying costs. Essentially, this results in the Company making a high interest loan to rate payers. Alternatively, if the Company over-recovers costs, this can lead to a negative carrying charge which results in the CenterPoint owing money to its customers.

Thus the Department believes that minimizing carrying costs should be a priority, and the aim when selecting a new CCRA. Carrying costs are calculated each month based on the month-end tracker balance. Total carrying costs for the year equal the sum of each month's carrying charges. Due to the fact that the CIP tracker balance varies considerably from month to month, setting a CCRA to attempt to zero out the CIP Tracker balance at any given time (*e.g.*, December 31, 2015) will not result in minimized total carrying costs. For instance, the date the financial incentive is booked typically causes a large under-recovery in that month. Therefore, having a goal to reduce the tracker balance to zero in a particular month is not likely to minimize total annual carrying charges as any date chosen would be arbitrary. Thus the Department believes that a better method for calculating CCRAs would be to find the rate that minimizes monthly carrying charges over the course of the year. The Department presents further recommendations on the application of carrying charges in Section II.D below.

[9] See pages 41-42 of the *Petition*.
[10] See page 51 of the Company's *Petition*.
[11] Carrying cost was calculated using the Company's proposed CCRA of $0.00884 per therm.
[12] Projected Dth throughput pursuant to Docket No. G008/GR-13-316. Excludes CIP-exempt customer Dth throughput.

Table 3 below shows the Department's projection of the CIP tracker account using a CCRA designed to minimize carrying charges (rather than reduce the tracker balance to zero on a certain date).

**Table 3: Projection of CenterPoint's CIP Tracker Account in 2015**

| Description | Time Period | Amount |
|---|---|---|
| Beginning Balance | December 31, 2014 | $ 6,335,301[13] |
| CIP Expenses | January 1 through December 31, 2015 | $25,569,528 |
| 2012 DSM Financial Incentive | To Be Approved in December 2015 | $8,506,837 |
| Carrying Charges | January 1 through December 31, 2015 | ($11) |
| Recovery via Base Rates | January 1 through December 31, 2015 | ($24,892,688) |
| Recovery via CCRA[14] | January 1 through December 31, 2015 | ($3,503,119) |
| Ending Balance | December 31, 2015 | $12,015,848 |

To calculate this CCRA the Department recreated CenterPoint's projection spreadsheets and calculated a CCRA that enabled the carrying charges to be as close to zero as possible. This resulted in a CCRA of $0.002626 per therm.[15] The Department notes that the large year-end balance for the CIP tracker account reflects the seasonal variations of the CIP recovery for CenterPoint; the large December 2015 tracker balance does not indicate the overall level of over or under recovery. Assuming a CCRA of $0.002626, the tracker balance would not continue to grow larger over time because the CCRA is calculated to minimize carrying charges thus ensuring that the average CIP tracker balance over the year would be close to zero.

[13] Beginning balance varies due rounding differences.
[14] Calculated at $0.002626 per therm multiplied by the expected volumes less exempted volumes.
[15] See Attachment 1.

Table 4 below compares the Department's proposed CCRA of $0.002626 per therm in the present docket with the Company's current CCRA of $0.00659 per therm.

**Table 4: Comparison of the Current CenterPoint CCRA and the Department Proposed CCRAs for All Customer Classes**

| Current CCRA ($/therm) | Proposed CCRA ($/therm) | Change ($/therm) | Percent Change |
|---|---|---|---|
| $0.00659 | $0.002626 | ($0.003964) | -60% |

As indicated in Table 4, the Department's proposed CCRA of $0.002626 represents a decrease of $0.003964 per therm, or approximately 60 percent, compared to the currently approved CCRA of $0.00659 per therm.

Thus the Department recommends that the Commission approve a CCRA of $0.002626 per therm to go into effect on January 1, 2015.

The Department recommends that the Commission approve the following proposed customer bill message:

> The MPUC has approved a Conservation Cost Recovery Adjustment (CCRA) factor of $0.002626 per therm. This charge is used to fund energy conservation activities and has been added to your delivery charge. For more information please call 1-800-245-2377 or visit our website at www.centerpointenergy.com.

*D. REVIEW OF CENTERPOINT'S CIP ACTIVITIES (2009-2013)*

In Table 5 below, the Department presents a comparison of CenterPoint's DSM and CIP activities during the period 2009 through 2013. Table 5 provides an indication of how the Company's DSM financial incentives, year-end tracker balances, reported CIP expenditures, and reported energy savings have changed during that period.

**Table 5: History of CenterPoint's CIP Activities (2009-2013)**

| | 2009 | 2010 | 2011 | 2012 | 2013 |
|---|---|---|---|---|---|
| DSM Financial Incentive | $1,394,200 | $3,493,921 | $4,590,392 | $3,207,411 | $10,890,131 |
| Incentive as a % of CIP Expenditures | 13.8% | 21.1% | 24.5% | 16.3% | 46.9% |
| Carrying Charges | $507,155 | $296,465 | $450,945 | $418,624 | $344,598 |
| Carrying Charges as % of CIP Expenditures | 5.0% | 1.8% | 2.4% | 2.1% | 1.5% |
| Year-End Tracker Balance | $6,879,416 | $10,216,655 | $9,248,025 | $14,225,552 | $8,501,064 |
| Year-End Tracker Balance as a % of CIP Expenditures | 67.99% | 61.64% | 49.42% | 72.3% | 36.6% |
| CIP Expenditures (as reported in status reports) | $10,117,898 | $16,574,737 | $18,713,923 | $19,680,178 | $23,222,379 |
| Achieved Energy Savings (Mcf) | 938,978 | 1,300,228 | 1,488,231 | 1,330,518 | 1,584,019 |
| Average Cost per Mcf Saved[16] | $10.78 | $12.75 | $12.57 | $14.79 | $14.66 |

As indicated in Table 5, compared to 2012 CenterPoint's 2013 proposed:

- DSM financial incentive is higher;
- carrying charges are lower;
- year-end tracker balance is lower;
- CIP expenditures are higher;
- achieved energy savings are higher;
- average cost per Mcf saved is lower.

The Department notes that carrying charges were first approved as part of Minnesota utilities' CIP tracker accounting in the early 1990s. One of the purposes of carrying charges, and allowing timely recovery through a CIP tracker account, was to provide utilities an incentive to invest in energy conservation by ensuring that they not only recovered all conservation costs incurred in a timely manner, but that they also received a carrying charge on uncollected balances. At that time financial incentives for conservation were de minimis. Now, however, the Commission provides large financial incentives for utility investments in CIP (CenterPoint's DSM financial incentives totaled $11,291,724 for 2010-2012). Rather than continue to calculate carrying charges on positive or negative monthly tracker account balances, the Department recommends that the Commission eliminate carrying charges The Department concludes that it is reasonable to disallow carrying charges beginning in the moth after the Commission issues its Order in this docket.

In the event that the Commission decides not to discontinue CenterPoint's CIP carrying charges, then the Department recommends that the Commission disallow carrying charges on CenterPoint's financial incentive. The Minnesota Chamber of Commerce (the Chamber) made this recommendation for Otter Tail Power Company in the Chamber's May 30, 2014 Comments (see Docket No. E017/M-14-201). The Chamber argued that carrying costs

[16] The average cost per Mcf saved equals CIP expenditures ($) divided by total energy savings (Mcf).

should not be charged "since the utility is not incurring any risk in receiving the incentive nor are dollars being held up to pay for the CIP expenditures." The Department agrees with the Chamber that paying carrying costs on CIP financial incentives is not needed and recommends that CenterPoint remove its incentive when calculating carrying charges. The Department anticipates that removing CenterPoint's DSM financial incentive may reduce carrying charges to such an extent as to virtually eliminate carrying charges.

The Department recommends that the Commission eliminate carrying charges on under- or over-recovered CIP balances. In the event that the Commission decides not to eliminate carrying charges on the entire CIP balance, the Department recommends that the Commission not allow carrying charges on CenterPoint's CIP financial incentive.

*E. STANDARDIZING INCENTIVE FILINGS*

In an attempt to standardize DSM financial incentive and CCRA filings the Department is recommending that:

1. utilities should record any DSM financial incentives awarded during the calendar year of the tracker filing in question;
2. based on experience from previous CCRA filings, utilities should calculate their proposed CCRA rate assuming that the rate will be implemented no earlier than November of the filing year;
3. utilities should include its next estimated DSM financial incentive in the CCRA calculation to minimize fluctuations in the tracker account balance when the next incentive is awarded; and
4. utilities should use the projected therm sales for the period the proposed CCRA will be effective, not the projected sales for the calendar year.

In the case of CenterPoint these recommendations are not necessary, as the Company consistently records its' DSM financial incentive promptly following Commission approval during the calendar year in question, and assumes for projection purposes that incentives are filed by the end of the year in question. Further, CenterPoint implements all its CCRA rates in January the year after approval, and thus meets the Departments goal of having the CCRA implemented at a consistent time year after year so as to maintain the CIP tracker balance as projected. Further by implementing their CCRA in January of each year they avoid issues of projected year sales not lining up with the CCRA effective dates.

Thus the Department does not believe that any of the above recommendations are necessary for CenterPoint to implement, as the Company's current practices fulfill the objectives of the standardizing recommendations.

## III. THE DEPARTMENT'S RECOMMENDATIONS

The Department recommends that the Commission:

1) approve CenterPoint's proposed 2013 DSM financial incentive of $10,890,131 to be included in the Company's CIP tracker account no sooner than the issue date of the Commission's *Order* in the present docket;

2) approve CenterPoint's 2013 CIP tracker account, as summarized in Table 1 above;

3) approve the Department's proposed CCRA of $0.002626 per therm, to be effective on January 1, 2015, in following with the Company's standard CCRA adjustment date;

4) discontinue approving carrying charges for under or over recovered balances in CenterPoint's CIP tracker account beginning in the moth after the Commission issues its Order in this docket;

5) in the event that the Commission continues to allow the application of carrying charges to the over and under recovery of CIP tracker accounts, disallow application of the carrying charge to the Company's financial incentive; and

6) approve the following bill message:

> The MPUC has approved a Conservation Cost Recovery Adjustment (CCRA) factor of $0.002626 per therm. This charge is used to fund energy conservation activities and has been added to your delivery charge. For more information please call 1-800-245-2377 or visit our website at www.centerpointenergy.com.

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| Expenses | Jan 15 Forecast | Feb 15 Forecast | Mar 15 Forecast | Apr 15 Forecast | May 15 Forecast | June 15 Forecast | July 15 forecast | Aug 15 Forecast | Sept 15 Forecast | Oct 15 Forecast | Nov 15 Forecast | Dec 15 Forecast | Annual Summary |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Beginning Tacker Balance | 6,335,301.15 | 6,548,846.20 | 6,345,885.66 | 4,635,549.35 | 1,000,586.78 | -2,329,375.38 | -5,127,292.75 | -5,879,484.55 | -5,577,547.41 | -5,011,311.97 | -4,098,034.84 | -2,525,721.89 | -5,682,599.64 |
| CIP Program Expenditures | 1,369,146.00 | 1,933,814.00 | 1,929,507.00 | 1,382,575.00 | 1,555,960.00 | 1,286,966.00 | 1,508,374.00 | 1,728,507.00 | 1,651,793.00 | 1,977,738.00 | 2,538,359.00 | 6,706,789.00 | 25,569,528.00 |
| Performance Incentive | | | | | | | | | | | | 8,506,837.00 | 8,506,837.00 |
| Total Expenses and Incentive | 7,704,447.15 | 8,482,660.20 | 8,275,392.66 | 6,018,124.35 | 2,556,546.78 | -1,042,409.38 | -3,618,918.75 | -4,150,977.55 | -3,925,754.41 | -3,033,573.97 | -1,559,675.84 | 12,687,904.11 | 28,393,765.36 |
| | | | | | | | | | | | | | |
| Revovery | | | | | | | | | | | | | |
| Total Volumnes (Dt) | 25,432,627.00 | 24,823,532.00 | 21,089,339.00 | 13,363,176.00 | 9,250,737.00 | 6,886,559.00 | 6,823,345.00 | 6,484,562.00 | 5,784,696.00 | 7,858,141.00 | 12,079,398.00 | 19,327,973.00 | 159,204,085.00 |
| Exemptions (Dt) | -264,156.00 | -1,881,050.00 | -2,111,431.00 | -1,835,400.00 | -1,928,554.00 | -2,028,100.00 | -2,891,400.00 | -2,689,400.00 | -1,913,000.00 | -1,925,878.00 | -2,009,811.00 | -2,324,577.00 | -23,802,757.00 |
| Volumes Less Exemptions (Dt) | 5,593,985.00 | 10,198,348.00 | 17,216,542.00 | 23,597,227.00 | 22,894,978.00 | 19,061,239.00 | 10,471,776.00 | 6,561,337.00 | 4,973,559.00 | 4,897,467.00 | 4,474,751.00 | 3,460,119.00 | 133,401,328.00 |
| Base Rate Revovery (CCRA) (per Dt) | 0.1866 | 0.1866 | 0.1866 | 0.1866 | 0.1866 | 0.1866 | 0.1866 | 0.1866 | 0.1866 | 0.1866 | 0.1866 | 0.1866 | |
| Base Rate Cost Recovery ($) | -1,043,837.60 | -1,903,011.74 | -3,212,606.74 | -4,403,242.56 | -4,272,202.89 | -3,556,827.20 | -1,954,033.40 | -1,224,345.48 | -928,066.11 | -913,867.34 | -834,988.54 | -645,658.21 | -24,892,687.80 |
| CCRA (Per Dt) | 0.02626 | 0.02626 | 0.02626 | 0.02626 | 0.02626 | 0.02626 | 0.02626 | 0.02626 | 0.02626 | 0.02626 | 0.02626 | 0.02626 | |
| CCRA Recovery ($) | -146,898.05 | -267,808.62 | -452,106.39 | -619,663.18 | -601,222.12 | -500,548.14 | -274,988.84 | -172,300.71 | -130,605.66 | -128,607.48 | -117,506.96 | -90,862.72 | -3,503,118.87 |
| Total Recovery | -1,190,735.65 | -2,170,820.36 | -3,664,713.13 | -5,022,905.74 | -4,873,425.02 | -4,057,375.33 | -2,229,022.24 | -1,396,646.19 | -1,058,671.77 | -1,042,474.83 | -952,495.50 | -736,520.93 | -28,395,806.68 |
| | | | | | | | | | | | | | |
| Carrying Charges | | | | | | | | | | | | | |
| Sub Balance | 6,513,711.51 | 6,311,839.85 | 4,610,679.53 | 995,218.61 | -2,316,878.24 | -5,099,784.72 | -5,847,940.99 | -5,547,623.75 | -4,984,426.17 | -4,076,048.80 | -2,512,171.34 | 11,951,383.18 | -2,041.32 |
| Accum Deffered Tax | -2,694,722.45 | -2,611,208.15 | -1,907,438.12 | -411,721.94 | 958,492.53 | 2,109,780.94 | 2,419,293.19 | 2,295,051.94 | 2,062,057.11 | 1,686,261.39 | 1,039,285.28 | -4,944,287.22 | |
| Net Investment | 3,818,989.06 | 3,700,631.70 | 2,703,241.41 | 583,496.67 | -1,358,385.71 | -2,990,003.78 | -3,428,647.80 | -3,252,571.80 | -2,922,369.07 | -2,389,787.41 | -1,472,886.06 | 7,007,095.96 | |
| Carry Charge Rate | 0.92% | 0.92% | 0.92% | 0.92% | 0.92% | 0.92% | 0.92% | 0.92% | 0.92% | 0.92% | 0.92% | 0.92% | |
| Carrying Charge | 35,134.70 | 34,045.81 | 24,869.82 | 5,368.17 | -12,497.15 | -27,508.03 | -31,543.56 | -29,923.66 | -26,885.80 | -21,986.04 | -13,550.55 | 64,465.28 | -11.01 |
| Ending Tracker balance | 6,548,846.20 | 6,345,885.66 | 4,635,549.35 | 1,000,586.78 | -2,329,375.38 | -5,127,292.75 | -5,879,484.55 | -5,577,547.41 | -5,011,311.97 | -4,098,034.84 | -2,525,721.89 | 12,015,848.46 | |

# CERTIFICATE OF SERVICE

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

Minnesota Department of Commerce
Comments

Docket No. G008/M-14-368

Dated this 16th day of July 2014

/s/Sharon Ferguson

| First Name | Last Name | Email | Company Name | Address | Delivery Method | View Trade Secret | Service List Name |
|---|---|---|---|---|---|---|---|
| Michael | Ahern | ahern.michael@dorsey.com | Dorsey & Whitney, LLP | 50 S 6th St Ste 1500<br><br>Minneapolis,<br>MN<br>554021498 | Electronic Service | No | OFF_SL_14-368_M-14-368 |
| Julia | Anderson | Julia.Anderson@ag.state.mn.us | Office of the Attorney General-DOC | 1800 BRM Tower<br>445 Minnesota St<br>St. Paul,<br>MN<br>551012134 | Electronic Service | Yes | OFF_SL_14-368_M-14-368 |
| Brenda A. | Bjorklund | brenda.bjorklund@centerpointenergy.com | CenterPoint Energy | 800 LaSalle Ave FL 14<br><br>Minneapolis,<br>MN<br>55402 | Electronic Service | No | OFF_SL_14-368_M-14-368 |
| William A. | Blazar | bblazar@mnchamber.com | Minnesota Chamber Of Commerce | Suite 1500<br>400 Robert Street North<br>St. Paul,<br>MN<br>55101 | Electronic Service | No | OFF_SL_14-368_M-14-368 |
| Christina | Brusven | cbrusven@fredlaw.com | Fredrikson & Byron, P.A. | 200 S 6th St Ste 4000<br><br>Minneapolis,<br>MN<br>554021425 | Electronic Service | No | OFF_SL_14-368_M-14-368 |
| Richard G. | Burud | burud@federatedrea.coop | Federated Rural Electric Assoc. | PO Box 69<br>77100 US Highway 71<br>Jackson,<br>MN<br>56143 | Electronic Service | No | OFF_SL_14-368_M-14-368 |
| Jeffrey A. | Daugherty | jeffrey.daugherty@centerpointenergy.com | CenterPoint Energy | 800 LaSalle Ave<br><br>Minneapolis,<br>MN<br>55402 | Electronic Service | No | OFF_SL_14-368_M-14-368 |
| Emily | Deering | edeering@mncenter.org | Minnesota Center for Environmental Advocacy | 26 E Exchange Street<br>Suite 206<br>St. Paul,<br>MN<br>55101 | Electronic Service | No | OFF_SL_14-368_M-14-368 |
| Ian | Dobson | ian.dobson@ag.state.mn.us | Office of the Attorney General-RUD | Antitrust and Utilities Division<br>445 Minnesota Street, 1400 BRM Tower<br>St. Paul,<br>MN<br>55101 | Electronic Service | No | OFF_SL_14-368_M-14-368 |
| Sharon | Ferguson | sharon.ferguson@state.mn.us | Department of Commerce | 85 7th Place E Ste 500<br><br>Saint Paul,<br>MN<br>551012198 | Electronic Service | No | OFF_SL_14-368_M-14-368 |

| First Name | Last Name | Email | Company Name | Address | Delivery Method | View Trade Secret | Service List Name |
|---|---|---|---|---|---|---|---|
| Edward | Garvey | garveyed@aol.com | Residence | 32 Lawton St<br><br>Saint Paul,<br>MN<br>55102 | Paper Service | No | OFF_SL_14-368_M-14-368 |
| Benjamin | Gerber | bgerber@mnchamber.com | Minnesota Chamber of Commerce | 400 Robert Street North<br>Suite 1500<br>St. Paul,<br>Minnesota<br>55101 | Electronic Service | No | OFF_SL_14-368_M-14-368 |
| Elizabeth | Goodpaster | bgoodpaster@mncenter.org | MN Center for Environmental Advocacy | Suite 206<br>26 East Exchange Street<br>St. Paul,<br>MN<br>551011667 | Electronic Service | No | OFF_SL_14-368_M-14-368 |
| Stephan | Gunn | sgunn@appliedenergygroup.com | Applied Energy Group | 1941 Pike Ln<br><br>De Pere,<br>WI<br>54115 | Electronic Service | No | OFF_SL_14-368_M-14-368 |
| Burl W. | Haar | burl.haar@state.mn.us | Public Utilities Commission | Suite 350<br>121 7th Place East<br>St. Paul,<br>MN<br>551012147 | Electronic Service | Yes | OFF_SL_14-368_M-14-368 |
| Jeffrey | Haase | jhaase@grenergy.com | Great River Energy | 12300 Elm Creek Blvd<br><br>Maple Grove,<br>MN<br>55369 | Electronic Service | No | OFF_SL_14-368_M-14-368 |
| Eric | Jensen | ejensen@iwla.org | Izaak Walton League of America | Suite 202<br>1619 Dayton Avenue<br>St. Paul,<br>MN<br>55104 | Electronic Service | No | OFF_SL_14-368_M-14-368 |
| Paula | Johnson | paulajohnson@alliantenergy.com | Alliant Energy-Interstate Power and Light Company | P.O. Box 351<br>200 First Street, SE<br>Cedar Rapids,<br>IA<br>524060351 | Electronic Service | No | OFF_SL_14-368_M-14-368 |
| Joel | Johnson | joel@mrea.org | Minnesota Rural Electric Association | 11640 73rd Ave N<br><br>Maple Grove,<br>MN<br>55369 | Electronic Service | No | OFF_SL_14-368_M-14-368 |
| Larry | Johnston | lw.johnston@smmpa.org | SMMPA | 500 1st Ave SW<br><br>Rochester,<br>MN<br>55902-3303 | Electronic Service | No | OFF_SL_14-368_M-14-368 |

| First Name | Last Name | Email | Company Name | Address | Delivery Method | View Trade Secret | Service List Name |
|---|---|---|---|---|---|---|---|
| Tina | Koecher | tkoecher@mnpower.com | Minnesota Power | 30 W Superior St<br><br>Duluth,<br>MN<br>558022093 | Electronic Service | No | OFF_SL_14-368_M-14-368 |
| John | Lindell | agorud.ecf@ag.state.mn.us | Office of the Attorney General-RUD | 1400 BRM Tower<br>445 Minnesota St<br>St. Paul,<br>MN<br>551012130 | Electronic Service | Yes | OFF_SL_14-368_M-14-368 |
| Nick | Mark | nick.mark@centerpointenergy.com | CenterPoint Energy | 800 LaSalle Ave<br><br>Minneapolis,<br>MN<br>55402 | Electronic Service | No | OFF_SL_14-368_M-14-368 |
| Pam | Marshall | pam@energycents.org | Energy CENTS Coalition | 823 7th St E<br><br>St. Paul,<br>MN<br>55106 | Electronic Service | No | OFF_SL_14-368_M-14-368 |
| Samuel | Mason | smason@beltramielectric.com | Beltrami Electric Cooperative, Inc. | 4111 Technology Dr. NW<br>PO Box 488<br>Bemidji,<br>MN<br>56619-0488 | Electronic Service | No | OFF_SL_14-368_M-14-368 |
| Bridget | McLaughlin | bmclaughlin@mncee.org | Center for Energy & Environment | 212 3rd Ave N Ste 560<br><br>Minneapolis,<br>MN<br>55401 | Electronic Service | No | OFF_SL_14-368_M-14-368 |
| Brian | Meloy | brian.meloy@stinsonleonard.com | Stinson,Leonard, Street LLP | 150 S 5th St Ste 2300<br><br>Minneapolis,<br>MN<br>55402 | Electronic Service | No | OFF_SL_14-368_M-14-368 |
| Andrew | Moratzka | apmoratzka@stoel.com | Stoel Rives LLP | 33 South Sixth Street<br>Suite 4200<br>Minneapolis,<br>MN<br>55402 | Electronic Service | No | OFF_SL_14-368_M-14-368 |
| Rita | Mulkern | rita.mulkern@mdu.com | Great Plains Natural Gas | 400 N 4th St<br><br>Bismarck,<br>ND<br>58501 | Electronic Service | No | OFF_SL_14-368_M-14-368 |
| Carl | Nelson | cnelson@mncee.org | Center for Energy and Environment | 212 3rd Ave N Ste 560<br><br>Minneapolis,<br>MN<br>55401 | Electronic Service | No | OFF_SL_14-368_M-14-368 |

| First Name | Last Name | Email | Company Name | Address | Delivery Method | View Trade Secret | Service List Name |
|---|---|---|---|---|---|---|---|
| Kim | Pederson | kpederson@otpco.com | Otter Tail Power Company | 215 S Cascade St<br>PO Box 496<br>Fergus Falls,<br>MN<br>565380496 | Electronic Service | No | OFF_SL_14-368_M-14-368 |
| James | Phillippo | jophillippo@minnesotaenergyresources.com | Minnesota Energy Resources Corporation | PO Box 19001<br><br>Green Bay,<br>WI<br>54307-9001 | Electronic Service | No | OFF_SL_14-368_M-14-368 |
| Lisa | Pickard | lpickard@minnkota.com | Minnkota Power Cooperative | 1822 Mill Rd<br>PO Box 13200<br>Grand Forks,<br>ND<br>582083200 | Electronic Service | No | OFF_SL_14-368_M-14-368 |
| Bruce | Sayler | bruces@connexusenergy.com | Connexus Energy | 14601 Ramsey Boulevard<br><br>Ransey,<br>MN<br>55303 | Electronic Service | No | OFF_SL_14-368_M-14-368 |
| Steve | Seidl | N/A | EnerChange | 23505 Smithtown Rd Ste 280<br><br>Shorewood,<br>MN<br>55331 | Paper Service | No | OFF_SL_14-368_M-14-368 |
| Jeffrey | Springer | jef@dairynet.com | Dairyland Power Cooperative | 3200 East Avenue South<br><br>La Crosse,<br>WI<br>54601 | Electronic Service | No | OFF_SL_14-368_M-14-368 |
| Grey | Staples | gstaples@mendotagroup.com | The Mendota Group LLC | 1830 Fargo Lane<br><br>Mendota Heights,<br>MN<br>55118 | Electronic Service | No | OFF_SL_14-368_M-14-368 |
| Michael | T'Kach | MTKach@enerchange.org | EnerChange.Org | 2642 Irving Ave S<br><br>Minneapolis,<br>MN<br>55408 | Electronic Service | No | OFF_SL_14-368_M-14-368 |
| SaGonna | Thompson | Regulatory.Records@xcelenergy.com | Xcel Energy | 414 Nicollet Mall FL 7<br><br>Minneapolis,<br>MN<br>554011993 | Electronic Service | No | OFF_SL_14-368_M-14-368 |
| Katie | Topinka | katie.topinka@state.mn.us | Minnesota Housing Finance Agency | 400 Sibley Street<br>Suite 300<br>St. Paul,<br>MN<br>55101 | Electronic Service | No | OFF_SL_14-368_M-14-368 |

| First Name | Last Name | Email | Company Name | Address | Delivery Method | View Trade Secret | Service List Name |
|---|---|---|---|---|---|---|---|
| Robert | Walsh | bwalsh@mnvalleyrec.com | Minnesota Valley Coop Light and Power | PO Box 248<br>501 S 1st St<br>Montevideo,<br>MN<br>56265 | Electronic Service | No | OFF_SL_14-368_M-14-368 |

| First Name | Last Name | Email | Company Name | Address | Delivery Method | View Trade Secret | Service List Name |
|---|---|---|---|---|---|---|---|
| George | Agriesti | gagriesti@mnpower.com | Minnesota Power | 30 W Superior St<br><br>Duluth,<br>MN<br>55802 | Electronic Service | No | SPL_SL__CIP SPECIAL SERVICE LIST |
| Julie Rae | Ambach | jambach@shakopeeutilities.com | Shakopee Public Utilties | 255 Sarazin St<br><br>Shakopee,<br>MN<br>55379 | Electronic Service | No | SPL_SL__CIP SPECIAL SERVICE LIST |
| Julia | Anderson | Julia.Anderson@ag.state.mn.us | Office of the Attorney General-DOC | 1800 BRM Tower<br>445 Minnesota St<br>St. Paul,<br>MN<br>551012134 | Electronic Service | No | SPL_SL__CIP SPECIAL SERVICE LIST |
| Tom | Balster | tombalster@alliantenergy.com | Interstate Power & Light Company | PO Box 351<br>200 1st St SE<br>Cedar Rapids,<br>IA<br>524060351 | Electronic Service | No | SPL_SL__CIP SPECIAL SERVICE LIST |
| William | Black | bblack@mmua.org | MMUA | Suite 400<br>3025 Harbor Lane North<br>Plymouth,<br>MN<br>554475142 | Electronic Service | No | SPL_SL__CIP SPECIAL SERVICE LIST |
| Christina | Brusven | cbrusven@fredlaw.com | Fredrikson & Byron, P.A. | 200 S 6th St Ste 4000<br><br>Minneapolis,<br>MN<br>554021425 | Electronic Service | No | SPL_SL__CIP SPECIAL SERVICE LIST |
| Gary | Chesnut | gchesnut@agp.com | AG Processing Inc. a cooperative | 12700 West Dodge Road<br>PO Box 2047<br>Omaha,<br>NE<br>681032047 | Electronic Service | No | SPL_SL__CIP SPECIAL SERVICE LIST |
| Gary | Connett | gconnett@grenergy.com | Great River Energy | 12300 Elm Creek Blvd N<br><br>Maple Grove,<br>MN<br>553694718 | Electronic Service | No | SPL_SL__CIP SPECIAL SERVICE LIST |
| George | Crocker | gwillc@nawo.org | North American Water Office | PO Box 174<br><br>Lake Elmo,<br>MN<br>55042 | Electronic Service | No | SPL_SL__CIP SPECIAL SERVICE LIST |
| Jill | Curran | jcurran@mnchamber.com | Minnesota Waste Wise | 400 Robert Street North<br>Suite 1500<br>St. Paul,<br>Minnesota<br>55101 | Electronic Service | No | SPL_SL__CIP SPECIAL SERVICE LIST |
| Jeffrey A. | Daugherty | jeffrey.daugherty@centerpointenergy.com | CenterPoint Energy | 800 LaSalle Ave<br><br>Minneapolis,<br>MN<br>55402 | Electronic Service | No | SPL_SL__CIP SPECIAL SERVICE LIST |

| First Name | Last Name | Email | Company Name | Address | Delivery Method | View Trade Secret | Service List Name |
|---|---|---|---|---|---|---|---|
| Steve | Downer | sdowner@mmua.org | MMUA | 3025 Harbor Ln N Ste 400<br><br>Plymouth,<br>MN<br>554475142 | Electronic Service | No | SPL_SL__CIP SPECIAL SERVICE LIST |
| Chris | Duffrin | chrisd@thenec.org | Neighborhood Energy Connection | 624 Selby Avenue<br><br>St. Paul,<br>MN<br>55104 | Electronic Service | No | SPL_SL__CIP SPECIAL SERVICE LIST |
| Jim | Erchul | | Daytons Bluff Neighborhood Housing Sv. | 823 E 7th St<br><br>St. Paul,<br>MN<br>55106 | Paper Service | No | SPL_SL__CIP SPECIAL SERVICE LIST |
| Greg | Ernst | gaernst@q.com | G. A. Ernst & Associates, Inc. | 2377 Union Lake Trl<br><br>Northfield,<br>MN<br>55057 | Electronic Service | No | SPL_SL__CIP SPECIAL SERVICE LIST |
| Melissa S | Feine | melissa.feine@semcac.org | SEMCAC | PO Box 549<br>204 S Elm St<br>Rushford,<br>MN<br>55971 | Electronic Service | No | SPL_SL__CIP SPECIAL SERVICE LIST |
| Sharon | Ferguson | sharon.ferguson@state.mn.us | Department of Commerce | 85 7th Place E Ste 500<br><br>Saint Paul,<br>MN<br>551012198 | Electronic Service | No | SPL_SL__CIP SPECIAL SERVICE LIST |
| Kelsey | Genung | kelsey.genung@xcelenergy.com | Xcel Energy | 414 Nicollet Mall, Fl. 6<br><br>Minneapolis,<br>MN<br>55401 | Electronic Service | No | SPL_SL__CIP SPECIAL SERVICE LIST |
| Angela E. | Gordon | angela.e.gordon@lmco.com | Lockheed Martin | 1000 Clark Ave.<br><br>St. Louis,<br>MO<br>63102 | Electronic Service | No | SPL_SL__CIP SPECIAL SERVICE LIST |
| Pat | Green | N/A | N Energy Dev | City Hall<br>401 E 21st St<br>Hibbing,<br>MN<br>55746 | Paper Service | No | SPL_SL__CIP SPECIAL SERVICE LIST |
| Stephan | Gunn | sgunn@appliedenergygroup.com | Applied Energy Group | 1941 Pike Ln<br><br>De Pere,<br>WI<br>54115 | Electronic Service | No | SPL_SL__CIP SPECIAL SERVICE LIST |

| First Name | Last Name | Email | Company Name | Address | Delivery Method | View Trade Secret | Service List Name |
|---|---|---|---|---|---|---|---|
| Burl W. | Haar | burl.haar@state.mn.us | Public Utilities Commission | Suite 350<br>121 7th Place East<br>St. Paul,<br>MN<br>551012147 | Electronic Service | No | SPL_SL__CIP SPECIAL SERVICE LIST |
| Tony | Hainault | anthony.hainault@co.hennepin.mn.us | Hennepin County DES | 701 4th Ave S Ste 700<br><br>Minneapolis,<br>MN<br>55415-1842 | Electronic Service | No | SPL_SL__CIP SPECIAL SERVICE LIST |
| Patty | Hanson | phanson@rpu.org | Rochester Public Utilities | 4000 E River Rd NE<br><br>Rochester,<br>MN<br>55906 | Electronic Service | No | SPL_SL__CIP SPECIAL SERVICE LIST |
| Norm | Harold | N/A | NKS Consulting | 5591 E 180th St<br><br>Prior Lake,<br>MN<br>55372 | Paper Service | No | SPL_SL__CIP SPECIAL SERVICE LIST |
| Jared | Hendricks | hendricksj@owatonnautilities.com | Owatonna Public Utilities | PO Box 800<br>208 S Walnut Ave<br>Owatonna,<br>MN<br>55060-2940 | Electronic Service | No | SPL_SL__CIP SPECIAL SERVICE LIST |
| Holly | Hinman | holly.r.hinman@xcelenergy.com | Xcel Energy | 414 Nicollet Mall, 6th Floor<br><br>Minneapolis,<br>MN<br>55401 | Electronic Service | No | SPL_SL__CIP SPECIAL SERVICE LIST |
| Randy | Hoffman | rhoffman@eastriver.coop | East River Electric Power Coop | 121 SE 1st St<br>PO Box 227<br>Madison,<br>SD<br>57042 | Electronic Service | No | SPL_SL__CIP SPECIAL SERVICE LIST |
| Karolanne | Hoffman | kmh@dairynet.com | Dairyland Power Cooperative | PO Box 817<br><br>La Crosse,<br>WI<br>54602-0817 | Electronic Service | No | SPL_SL__CIP SPECIAL SERVICE LIST |
| Tom | Holt | tholt@eastriver.coop | East River Electric Power Coop., Inc. | PO Box 227<br><br>Madison,<br>SD<br>57042 | Electronic Service | No | SPL_SL__CIP SPECIAL SERVICE LIST |
| Michael | Hoy | mhoy@dakotaelectric.com | Dakota Electric Association | 4300 220th St W<br><br>Farmington,<br>MN<br>55024-9583 | Electronic Service | No | SPL_SL__CIP SPECIAL SERVICE LIST |

| First Name | Last Name | Email | Company Name | Address | Delivery Method | View Trade Secret | Service List Name |
|---|---|---|---|---|---|---|---|
| Anne | Hunt | anne.hunt@ci.stpaul.mn.us | City of Saint Paul | 390 City Hall<br>15 West Kellogg Boulevard<br><br>Saint Paul,<br>MN<br>55102 | Electronic Service | No | SPL_SL__CIP SPECIAL SERVICE LIST |
| Eric | Jensen | ejensen@iwla.org | Izaak Walton League of America | Suite 202<br>1619 Dayton Avenue<br>St. Paul,<br>MN<br>55104 | Electronic Service | No | SPL_SL__CIP SPECIAL SERVICE LIST |
| Dave | Johnson | N/A | Community Action of Minneapolis | 2104 Park Ave S<br><br>Minneapolis,<br>MN<br>55404 | Paper Service | No | SPL_SL__CIP SPECIAL SERVICE LIST |
| Dave | Johnson | dave.johnson@aeoa.org | Arrowhead Economic Opportunity Agency | 702 3rd Ave S<br><br>Virginia,<br>MN<br>55792 | Electronic Service | No | SPL_SL__CIP SPECIAL SERVICE LIST |
| Joel | Johnson | joel@mrea.org | Minnesota Rural Electric Association | 11640 73rd Ave N<br><br>Maple Grove,<br>MN<br>55369 | Electronic Service | No | SPL_SL__CIP SPECIAL SERVICE LIST |
| Paula | Johnson | paulajohnson@alliantenergy.com | Alliant Energy-Interstate Power and Light Company | P.O. Box 351<br>200 First Street, SE<br>Cedar Rapids,<br>IA<br>524060351 | Electronic Service | No | SPL_SL__CIP SPECIAL SERVICE LIST |
| Larry | Johnston | lw.johnston@smmpa.org | SMMPA | 500 1st Ave SW<br><br>Rochester,<br>MN<br>55902-3303 | Electronic Service | No | SPL_SL__CIP SPECIAL SERVICE LIST |
| Deborah | Knoll | dknoll@mnpower.com | Minnesota Power | 30 W Superior St<br><br>Duluth,<br>MN<br>55802 | Electronic Service | No | SPL_SL__CIP SPECIAL SERVICE LIST |
| Tina | Koecher | tkoecher@mnpower.com | Minnesota Power | 30 W Superior St<br><br>Duluth,<br>MN<br>558022093 | Electronic Service | No | SPL_SL__CIP SPECIAL SERVICE LIST |
| Kelly | Lady | kellyl@austinutilities.com | Austin Utilities | 400 4th St NE<br><br>Austin,<br>MN<br>55912 | Electronic Service | No | SPL_SL__CIP SPECIAL SERVICE LIST |

| First Name | Last Name | Email | Company Name | Address | Delivery Method | View Trade Secret | Service List Name |
|---|---|---|---|---|---|---|---|
| Martin | Lepak | N/A | Arrowhead Economic Opportunity | 702 S 3rd Ave<br><br>Virginia,<br>MN<br>55792 | Paper Service | No | SPL_SL__CIP SPECIAL SERVICE LIST |
| Allan | Lian | alian@mnpower.com | Minnesota Power | 30 W Superior St<br><br>Duluth,<br>MN<br>55802 | Electronic Service | No | SPL_SL__CIP SPECIAL SERVICE LIST |
| John | Lindell | agorud.ecf@ag.state.mn.us | Office of the Attorney General-RUD | 1400 BRM Tower<br>445 Minnesota St<br>St. Paul,<br>MN<br>551012130 | Electronic Service | No | SPL_SL__CIP SPECIAL SERVICE LIST |
| Nick | Mark | nick.mark@centerpointenergy.com | CenterPoint Energy | 800 LaSalle Ave<br><br>Minneapolis,<br>MN<br>55402 | Electronic Service | No | SPL_SL__CIP SPECIAL SERVICE LIST |
| Pam | Marshall | pam@energycents.org | Energy CENTS Coalition | 823 7th St E<br><br>St. Paul,<br>MN<br>55106 | Electronic Service | No | SPL_SL__CIP SPECIAL SERVICE LIST |
| Scot | McClure | scotmcclure@alliantenergy.com | Interstate Power And Light Company | 4902 N Biltmore Ln<br>PO Box 77007<br>Madison,<br>WI<br>537071007 | Electronic Service | No | SPL_SL__CIP SPECIAL SERVICE LIST |
| John | McWilliams | jmm@dairynet.com | Dairyland Power Cooperative | 3200 East Ave SPO Box 817<br><br>La Crosse,<br>WI<br>54601-7227 | Electronic Service | No | SPL_SL__CIP SPECIAL SERVICE LIST |
| Brian | Meloy | brian.meloy@stinsonleonard.com | Stinson,Leonard, Street LLP | 150 S 5th St Ste 2300<br><br>Minneapolis,<br>MN<br>55402 | Electronic Service | No | SPL_SL__CIP SPECIAL SERVICE LIST |
| David | Moeller | dmoeller@allete.com | Minnesota Power | 30 W Superior St<br><br>Duluth,<br>MN<br>558022093 | Electronic Service | No | SPL_SL__CIP SPECIAL SERVICE LIST |
| Andrew | Moratzka | apmoratzka@stoel.com | Stoel Rives LLP | 33 South Sixth Street<br>Suite 4200<br>Minneapolis,<br>MN<br>55402 | Electronic Service | No | SPL_SL__CIP SPECIAL SERVICE LIST |

| First Name | Last Name | Email | Company Name | Address | Delivery Method | View Trade Secret | Service List Name |
|---|---|---|---|---|---|---|---|
| Gary | Myers | garym@hpuc.com | Hibbing Public Utilities | 1902 E 6th Ave<br><br>Hibbing,<br>MN<br>55746 | Electronic Service | No | SPL_SL__CIP SPECIAL SERVICE LIST |
| Susan K | Nathan | snathan@appliedenergygroup.com | Applied Energy Group | 2215 NE 107th Ter<br><br>Kansas City,<br>MO<br>64155-8513 | Electronic Service | No | SPL_SL__CIP SPECIAL SERVICE LIST |
| Carl | Nelson | cnelson@mncee.org | Center for Energy and Environment | 212 3rd Ave N Ste 560<br><br>Minneapolis,<br>MN<br>55401 | Electronic Service | No | SPL_SL__CIP SPECIAL SERVICE LIST |
| Gary | Olson | | Product Recovery, Inc. | 2605 E Cliff Rd<br><br>Burnsville,<br>MN<br>55337 | Paper Service | No | SPL_SL__CIP SPECIAL SERVICE LIST |
| Kim | Pederson | kpederson@otpco.com | Otter Tail Power Company | 215 S Cascade St<br>PO Box 496<br>Fergus Falls,<br>MN<br>565380496 | Electronic Service | No | SPL_SL__CIP SPECIAL SERVICE LIST |
| Audrey | Peer | audrey.peer@centerpointenergy.com | CenterPoint Energy | 800 Lasalle Avenue - 14th Floor<br><br>Minneapolis,<br>Minnesota<br>55402 | Electronic Service | No | SPL_SL__CIP SPECIAL SERVICE LIST |
| Lisa | Pickard | lpickard@minnkota.com | Minnkota Power Cooperative | 1822 Mill Rd<br>PO Box 13200<br>Grand Forks,<br>ND<br>582083200 | Electronic Service | No | SPL_SL__CIP SPECIAL SERVICE LIST |
| Bill | Poppert | | Technology North | 2433 Highwood Ave<br><br>St. Paul,<br>MN<br>55119 | Paper Service | No | SPL_SL__CIP SPECIAL SERVICE LIST |
| Cindy | Schweitzer Rott | cindy.schweitzer@clearesult.com | CLEAResult's | S12637A Merrilee Rd.<br><br>Spring Green,<br>WI<br>53588 | Electronic Service | No | SPL_SL__CIP SPECIAL SERVICE LIST |
| Tom | Smilanich | | Passive Concepts | 228 6th Ave N<br><br>South St. Paul,<br>MN<br>55075 | Paper Service | No | SPL_SL__CIP SPECIAL SERVICE LIST |

| First Name | Last Name | Email | Company Name | Address | Delivery Method | View Trade Secret | Service List Name |
|---|---|---|---|---|---|---|---|
| Ken | Smith | ken.smith@districtenergy.com | District Energy St. Paul Inc. | 76 W Kellogg Blvd<br><br>St. Paul,<br>MN<br>55102 | Electronic Service | No | SPL_SL__CIP SPECIAL SERVICE LIST |
| Leo | Steidel | N/A | The Weidt Group | 5800 Baker Rd<br><br>Minnetonka,<br>MN<br>55345 | Paper Service | No | SPL_SL__CIP SPECIAL SERVICE LIST |
| John | Steinhoff | | Resource Solutions, Inc. | 318 Kensington Drive<br><br>Madison,<br>WI<br>53704 | Paper Service | No | SPL_SL__CIP SPECIAL SERVICE LIST |
| Richard | Szydlowski | rszydlowski@mncee.org | Center for Energy & Environment | 212 3rd Ave N Ste 560<br><br>Minneapolis,<br>MN<br>55401-1459 | Electronic Service | No | SPL_SL__CIP SPECIAL SERVICE LIST |
| SaGonna | Thompson | Regulatory.Records@xcelenergy.com | Xcel Energy | 414 Nicollet Mall FL 7<br><br>Minneapolis,<br>MN<br>554011993 | Electronic Service | No | SPL_SL__CIP SPECIAL SERVICE LIST |
| Steve | Tomac | stomac@bepc.com | Basin Electric Power Cooperative | 1717 E Interstate Ave<br><br>Bismarck,<br>ND<br>58501 | Electronic Service | No | SPL_SL__CIP SPECIAL SERVICE LIST |
| Lisa | Wilson | lisa.wilson@enbridge.com | Enbridge Energy Company, Inc. | 1409 Hammond Ave FL 2<br><br>Superior,<br>WI<br>54880 | Electronic Service | No | SPL_SL__CIP SPECIAL SERVICE LIST |
| Robyn | Woeste | robynwoeste@alliantenergy.com | Interstate Power and Light Company | 200 First St SE<br><br>Cedar Rapids,<br>IA<br>52401 | Electronic Service | No | SPL_SL__CIP SPECIAL SERVICE LIST |