

**State of Minnesota
Public Utilities Commission**

Utility Information Request

Docket Number: E-015/GR-16-664

Date of Request: April 24, 2018

Requested From: Minnesota Power

Response Due: April 27, 2018

Analyst Requesting Information: Kevin O'Grady

Type of Inquiry:

| | | |
|-----------------|----------------|--------------|
| Financial | Rate of Return | Rate Design |
| Engineering | Forecasting | Conservation |
| Cost of Service | CIP | Other: |

If you feel your responses are proprietary, please indicate.

| Request Number | |
|----------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 017 | With respect to Minnesota Power's Request for Clarification (4/2/18), pp. 49-50: Please clarify your request with respect to Large Power Service, elaborate upon any inconsistencies, and provide proposed language for consideration by the Commission. |

Response:

On page 89 of the Commission's March 12, 2018 Findings of Fact, Conclusions, and Order in this docket ("Order"), Section XLVI.D., the Commission approves the Company's proposed tariff changes concerning Large Power standard service, non-contract service, the released energy rider, and expedited billing procedures. However, there are some inconsistencies with respect to approval of specific items that are listed on page 87 of the Commission's Order in Section XLVI.B.1 under Standard Service and approved on page 89 in the first sentence of Section XLVI.D. Commission Action. These are explained further below.

1. It is Minnesota Power's understanding that in decisions related to the Fuel Clause Adjustment Mechanism, Base Cost of Energy on page 47 of its Order, the Commission determined that the base cost of energy (i.e., the amount included in base rates) should be increased to 2.121¢/kWh, which would reduce the size of future adjustments through the fuel clause. That is inconsistent with the third bullet point under Large Power Standard Service on page 87, which states, "Include the entire cost of fuel and purchased energy in a separate line

Witness: Marcia A. Podratz
Response by: Marcia A. Podratz
Title: Director - Rates
Department: Rates
Telephone: 218-355-3570

item on customer bills.” This is what Minnesota Power proposed but not what the Commission approved on page 47 of the Order, where it said, “...the Commission will increase the Company’s base cost of energy to 2.121 cents/kWh, update the class-specific cost factors, and incorporate them into the base rates for the test year.”

2. The fifth bullet point on page 87 should not refer to the Large Power fuel and purchased energy cost, which is correctly identified as 2.100¢/kWh in the fourth bullet point. The 1.102¢/kWh referenced in the fifth bullet point was Minnesota Power’s proposed Large Power Firm Energy rate assuming that the entire cost of fuel and purchased energy would be included in a separate line item on customer bills rather than being incorporated into base rates. Related to this, the increase in the firm energy charge to 2.310¢/kWh stated in the second bullet point is an incorrect reference to the total current firm energy charge of 1.232¢/kWh plus the test year average fuel and purchased energy adjustment of 1.078¢/kWh. Minnesota Power notes that many of the numbers in the Commission Order referenced above appear to have come from Podratz Supplemental Direct Testimony, page 19, but are not all referenced correctly.
3. Given that the total allowed increase in revenue requirements for the Large Power class is less than proposed by the Company, the demand and energy charge components of the rate will need to be revised to result in collection of the appropriate amount of revenue. Therefore, Minnesota Power believes that approval of the specific proposed Large Power rate changes on page 87, under Standard Service and also Non-contract Service, is unnecessary.

Consistent with the Commission Order language in Section XXXVIII.A.D on page 77, which is analogous in that it addressed the need to align the specific rates under the Commission’s adoption of Residential Block Rate Design with the authorized revenue requirement,¹ Minnesota Power proposes the following language to address these items:

On page 89 of the Commission’s Order, modify the end of the first sentence of Section XLVI.D. Commission Action by deleting the words “and will approve them.” Then add a second sentence: “The Commission will approve them, with adjustments to the individual rate components as needed for consistency with the Commission’s separate actions regarding the fuel clause adjustment base cost of energy and to enable the Company to recover the full revenue requirement allowed by the Commission for the Large Power rate class.”

¹ “The Commission will therefore require Minnesota Power to implement a four-block rate schedule as proposed by the five signatories to the Settlement, with adjustments to the rates for each block as needed to enable the Company to recover the full revenue requirement allowed by the Commission for the Residential class.”

Witness: Marcia A. Podratz
Response by: Marcia A. Podratz
Title: Director - Rates
Department: Rates
Telephone: 218-355-3570

STATE OF MINNESOTA)
) ss
COUNTY OF ST. LOUIS)

AFFIDAVIT OF SERVICE VIA
ELECTRONIC FILING

Susan Romans of the City of Duluth, County of St. Louis, State of Minnesota, says that on the **26th** day of **April, 2018**, she served Minnesota Power's Response to MPUC IR 17 in **Docket No. E015/GR-16-664** on the Minnesota Public Utilities Commission and the Energy Resources Division of the Minnesota Department of Commerce via electronic filing. The persons on E-Docket's Official Service List for this Docket were served as requested.



Susan Romans

| First Name | Last Name | Email | Company Name | Address | Delivery Method | View Trade Secret | Service List Name |
|-------------|-----------|---------------------------|----------------------------------|------------------------------------------------------------------------------|--------------------|-------------------|-----------------------------------------------------------------|
| Christopher | Anderson | canderson@allete.com | Minnesota Power | 30 W Superior St Duluth, MN 558022191 | Electronic Service | No | OFF_SL_16-664_PUC Official Service List General Rate Case |
| Lori | Andresen | info@sosbluewater.org | Save Our Sky Blue Waters | P.O. Box 3661 Duluth, Minnesota 55803 | Electronic Service | No | OFF_SL_16-664_PUC Official Service List General Rate Case |
| Richard | Baxendale | | Boise Cascade Corporation | 926 Harvard Avenue East Seattle, WA 98102 | Paper Service | No | OFF_SL_16-664_PUC Official Service List General Rate Case |
| Peter | Beithon | pbeithon@otpc.com | Otter Tail Power Company | P.O. Box 496 215 South Cascade Street Fergus Falls, MN 565380496 | Electronic Service | No | OFF_SL_16-664_PUC Official Service List General Rate Case |
| Sundra | Bender | sundra.bender@state.mn.us | Public Utilities Commission | 121 7th Place East Suite 350 Saint Paul, MN 55101-2147 | Electronic Service | Yes | OFF_SL_16-664_PUC Official Service List General Rate Case |
| Sara | Bergan | sebergan@stoel.com | Stoel Rives LLP | 33 South Sixth Street Suite 4200 Minneapolis, MN 55402 | Electronic Service | No | OFF_SL_16-664_PUC Official Service List General Rate Case |
| 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_16-664_PUC Official Service List General Rate Case |
| David F. | Boehm | | Boehm, Kurtz & Lowry | Suite 1510 36 East Seventh Street Cincinnati, OH 45202 | Paper Service | No | OFF_SL_16-664_PUC Official Service List General Rate Case |
| Elizabeth | Brama | ebrama@briggs.com | Briggs and Morgan | 2200 IDS Center 80 South 8th Street Minneapolis, MN 55402 | Electronic Service | Yes | OFF_SL_16-664_PUC Official Service List General Rate Case |
| Jon | Brekke | jbrekke@grenergy.com | Great River Energy | 12300 Elm Creek Boulevard Maple Grove, MN 553694718 | Electronic Service | No | OFF_SL_16-664_PUC Official Service List General Rate Case |

| First Name | Last Name | Email | Company Name | Address | Delivery Method | View Trade Secret | Service List Name |
|----------------|--------------------|-----------------------------------|------------------------------------------------|---------------------------------------------------------------------|--------------------|-------------------|-----------------------------------------------------------------|
| Christina | Brusven | cbrusven@fredlaw.com | Fredrikson Byron | 200 S 6th St Ste 4000 Minneapolis, MN 554021425 | Electronic Service | No | OFF_SL_16-664_PUC Official Service List General Rate Case |
| 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_16-664_PUC Official Service List General Rate Case |
| David | Cartella | David.Cartella@cliffsnr.com | Cliffs Natural Resources Inc. | 200 Public Square Ste 3300 Cleveland, OH 44114-2315 | Electronic Service | No | OFF_SL_16-664_PUC Official Service List General Rate Case |
| Greg | Chandler | greg.chandler@upm.com | UPM Blandin Paper | 115 SW First St Grand Rapids, MN 55744 | Paper Service | No | OFF_SL_16-664_PUC Official Service List General Rate Case |
| Steve W. | Chriss | Stephen.chriss@walmart.com | Wal-Mart | 2001 SE 10th St. Bentonville, AR 72716-5530 | Electronic Service | No | OFF_SL_16-664_PUC Official Service List General Rate Case |
| Jeanne | Cochran | Jeanne.Cochran@state.mn.us | Office of Administrative Hearings | P.O. Box 64620 St. Paul, MN 55164-0620 | Electronic Service | No | OFF_SL_16-664_PUC Official Service List General Rate Case |
| Generic Notice | Commerce Attorneys | commerce.attorneys@ag.state.mn.us | Office of the Attorney General-DOC | 445 Minnesota Street Suite 1800 St. Paul, MN 55101 | Electronic Service | Yes | OFF_SL_16-664_PUC Official Service List General Rate Case |
| Carl | Cronin | Regulatory.records@xcelenergy.com | Xcel Energy | 414 Nicollet Mall FL 7 Minneapolis, MN 554011993 | Electronic Service | No | OFF_SL_16-664_PUC Official Service List General Rate Case |
| 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_16-664_PUC Official Service List General Rate Case |

| First Name | Last Name | Email | Company Name | Address | Delivery Method | View Trade Secret | Service List Name |
|------------|------------|--------------------------------------|--------------------------------------------|------------------------------------------------------------------------------|--------------------|-------------------|-----------------------------------------------------------------|
| Lisa | Daniels | lisadaniels@windustry.org | Windustry | 201 Ridgewood Ave Minneapolis, MN 55403 | Electronic Service | No | OFF_SL_16-664_PUC Official Service List General Rate Case |
| Ian | Dobson | residential.utilities@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_16-664_PUC Official Service List General Rate Case |
| Ron | Elwood | relwood@mnlaps.org | Mid-Minnesota Legal Aid | 2324 University Ave Ste 101 Saint Paul, MN 55114 | Electronic Service | No | OFF_SL_16-664_PUC Official Service List General Rate Case |
| Sharon | Ferguson | sharon.ferguson@state.mn.us | Department of Commerce | 85 7th Place E Ste 280 Saint Paul, MN 551012198 | Electronic Service | Yes | OFF_SL_16-664_PUC Official Service List General Rate Case |
| Edward | Garvey | garveyed@aol.com | Residence | 32 Lawton St Saint Paul, MN 55102 | Electronic Service | No | OFF_SL_16-664_PUC Official Service List General Rate Case |
| John R. | Gasele | jgasele@fryberger.com | Fryberger Buchanan Smith & Frederick PA | 700 Lonsdale Building 302 W Superior St Ste 700 Duluth, MN 55802 | Electronic Service | No | OFF_SL_16-664_PUC Official Service List General Rate Case |
| Bruce | Gerhardson | bgerhardson@otpc.com | Otter Tail Power Company | PO Box 496 215 S Cascade St Fergus Falls, MN 565380496 | Electronic Service | No | OFF_SL_16-664_PUC Official Service List General Rate Case |
| Barbara | Gervais | toftem@boreal.org | Town of Tofte | P O Box 2293 7240 Tofte Park Road Tofte, MN 55615 | Electronic Service | No | OFF_SL_16-664_PUC Official Service List General Rate Case |
| Janice | Hall | N/A | Cook County Board of Commissioners | 411 W 2nd St Court House Grand Marais, MN 55604-2307 | Paper Service | No | OFF_SL_16-664_PUC Official Service List General Rate Case |
| J Drake | Hamilton | hamilton@fresh-energy.org | Fresh Energy | 408 St Peter St Saint Paul, MN 55101 | Electronic Service | No | OFF_SL_16-664_PUC Official Service List General Rate Case |

| First Name | Last Name | Email | Company Name | Address | Delivery Method | View Trade Secret | Service List Name |
|------------|-----------|------------------------------|-----------------------------------------|--------------------------------------------------------------------------|--------------------|-------------------|-----------------------------------------------------------------|
| Sam | Hanson | shanson@briggs.com | Briggs And Morgan, P.A. | 2200 IDS Center 80 South Eighth Street Minneapolis, MN 55402 | Electronic Service | No | OFF_SL_16-664_PUC Official Service List General Rate Case |
| Robert | Harding | robert.harding@state.mn.us | Public Utilities Commission | Suite 350 121 7th Place East St. Paul, MN 55101 | Electronic Service | No | OFF_SL_16-664_PUC Official Service List General Rate Case |
| Kimberly | Hellwig | kimberly.hellwig@stoel.com | Stoel Rives LLP | 33 South Sixth Street Suite 4200 Minneapolis, MN 55402 | Electronic Service | Yes | OFF_SL_16-664_PUC Official Service List General Rate Case |
| Annete | Henkel | mui@mutilityinvestors.org | Minnesota Utility Investors | 413 Wacouta Street #230 St. Paul, MN 55101 | Electronic Service | No | OFF_SL_16-664_PUC Official Service List General Rate Case |
| Shane | Henriksen | shane.henriksen@enbridge.com | Enbridge Energy Company, Inc. | 1409 Hammond Ave FL 2 Superior, WI 54880 | Electronic Service | No | OFF_SL_16-664_PUC Official Service List General Rate Case |
| Valerie | Herring | vherring@briggs.com | Briggs and Morgan, P.A. | 2200 IDS Center 80 S. Eighth Street Minneapolis, MN 55402 | Electronic Service | Yes | OFF_SL_16-664_PUC Official Service List General Rate Case |
| Lori | Hoyum | lhoyum@mnpower.com | Minnesota Power | 30 West Superior Street Duluth, MN 55802 | Electronic Service | No | OFF_SL_16-664_PUC Official Service List General Rate Case |
| James | Jarvi | N/A | Minnesota Ore Operations - U S Steel | P O Box 417 Mountain Iron, MN 55768 | Paper Service | No | OFF_SL_16-664_PUC Official Service List General Rate Case |
| Alan | Jenkins | aj@jenkinsatlaw.com | Jenkins at Law | 2265 Roswell Road Suite 100 Marietta, GA 30062 | Electronic Service | No | OFF_SL_16-664_PUC Official Service List General Rate Case |
| | | | | | | | |

| First Name | Last Name | Email | Company Name | Address | Delivery Method | View Trade Secret | Service List Name |
|------------|------------------|-------------------------------|------------------------------------|----------------------------------------------------------------------------|--------------------|-------------------|-----------------------------------------------------------------|
| Linda | Jensen | linda.s.jensen@ag.state.mn.us | Office of the Attorney General-DOC | 1800 BRM Tower 445 Minnesota Street St. Paul, MN 551012134 | Electronic Service | Yes | OFF_SL_16-664_PUC Official Service List General Rate Case |
| Kelsey | Johnson | Kjohnson@taconite.org | Iron Mining Association | 324 West Superior Street Suite 502 Duluth, MN 55802 | Electronic Service | No | OFF_SL_16-664_PUC Official Service List General Rate Case |
| Richard | Johnson | Rick.Johnson@lawmoss.com | Moss & Barnett | 150 S. 5th Street Suite 1200 Minneapolis, MN 55402 | Electronic Service | No | OFF_SL_16-664_PUC Official Service List General Rate Case |
| Sarah | Johnson Phillips | sarah.phillips@stoel.com | Stoel Rives LLP | 33 South Sixth Street Suite 4200 Minneapolis, MN 55402 | Electronic Service | Yes | OFF_SL_16-664_PUC Official Service List General Rate Case |
| Travis | Kolari | N/A | Keetac | PO Box 217 Keewatin, MN 55753 | Paper Service | No | OFF_SL_16-664_PUC Official Service List General Rate Case |
| 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_16-664_PUC Official Service List General Rate Case |
| Ganesh | Krishnan | ganesh.krishnan@state.mn.us | Public Utilities Commission | Suite 350121 7th Place East St. Paul, MN 55101 | Electronic Service | No | OFF_SL_16-664_PUC Official Service List General Rate Case |
| Nathan N | LaCoursiere | nlacoursiere@duluthmn.gov | City of Duluth | 411 W 1st St Rm 410 Duluth, MN 55802 | Electronic Service | No | OFF_SL_16-664_PUC Official Service List General Rate Case |
| David | Langmo | david.langmo@sappi.com | Sappi North America | P O Box 511 2201 Avenue B Cloquet, MN 55720 | Electronic Service | No | OFF_SL_16-664_PUC Official Service List General Rate Case |
| | | | | | | | |

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|------------|---------------|-----------------------------------|------------------------------------------------|----------------------------------------------------------------------|--------------------|-------------------|-----------------------------------------------------------------|
| James D. | Larson | james.larson@avantenergy.com | Avant Energy Services | 220 S 6th St Ste 1300 Minneapolis, MN 55402 | Electronic Service | No | OFF_SL_16-664_PUC Official Service List General Rate Case |
| Douglas | Larson | dlarson@dakotaelectric.com | Dakota Electric Association | 4300 220th St W Farmington, MN 55024 | Electronic Service | No | OFF_SL_16-664_PUC Official Service List General Rate Case |
| Emily | Larson | eLarson@duluthmn.gov | City of Duluth | 411 W 1st St Rm 403 Duluth, MN 55802 | Electronic Service | No | OFF_SL_16-664_PUC Official Service List General Rate Case |
| Annie | Levenson Falk | annie.lf@citizensutilityboard.org | Citizens Utility Board | 332 Minnesota Street, Suite W1360 St. Paul, MN 55101 | Electronic Service | No | OFF_SL_16-664_PUC Official Service List General Rate Case |
| Annie | Levenson Falk | anniel@cupminnesota.org | Citizens Utility Board of Minnesota | 332 Minnesota Street, Suite W1360 St. Paul, MN 55101 | Electronic Service | No | OFF_SL_16-664_PUC Official Service List General Rate Case |
| LeRoger | Lind | llind@yahoo.com | Save Lake Superior Association | P.O. Box 101 Two Harbors, MN 55616 | Electronic Service | No | OFF_SL_16-664_PUC Official Service List General Rate Case |
| Eric | Lindberg | elindberg@mncenter.org | Minnesota Center for Environmental Advocacy | 26 E Exchange St Ste 206 Saint Paul, MN 55101 | Electronic Service | Yes | OFF_SL_16-664_PUC Official Service List General Rate Case |
| Patrick | Loupin | PatrickLoupin@PackagingCorp.com | Packaging Corporation of America | PO Box 990050 Boise, ID 83799-0050 | Electronic Service | No | OFF_SL_16-664_PUC Official Service List General Rate Case |
| Susan | Ludwig | sludwig@mnpower.com | Minnesota Power | 30 West Superior Street Duluth, MN 55802 | Electronic Service | No | OFF_SL_16-664_PUC Official Service List General Rate Case |

| First Name | Last Name | Email | Company Name | Address | Delivery Method | View Trade Secret | Service List Name |
|------------|------------|------------------------------|------------------------------------------|-----------------------------------------------------------------------------------------------------|--------------------|-------------------|-----------------------------------------------------------------|
| Kavita | Maini | kmaini@wi.rr.com | KM Energy Consulting LLC | 961 N Lost Woods Rd Oconomowoc, WI 53066 | Electronic Service | No | OFF_SL_16-664_PUC Official Service List General Rate Case |
| Sarah | Manchester | sarah.manchester@sappi.com | Sappi North American | 255 State Street Floor 4 Boston, MA 02109-2617 | Electronic Service | No | OFF_SL_16-664_PUC Official Service List General Rate Case |
| Tony | Mancuso | mancusot@stlouiscountymn.gov | Saint Louis County Property Mgmt Dept | Duluth Courthouse 100 N 5th Ave W Rm 515 Duluth, MN 55802-1209 | Electronic Service | No | OFF_SL_16-664_PUC Official Service List General Rate Case |
| Pam | Marshall | pam@energycents.org | Energy CENTS Coalition | 823 7th St E St. Paul, MN 55106 | Electronic Service | No | OFF_SL_16-664_PUC Official Service List General Rate Case |
| Keith | Matzdorf | keith.matzdorf@sappi.com | Sappi Fine Paper North America | PO Box 511 2201 Avenue B Cloquet, MN 55720 | Electronic Service | No | OFF_SL_16-664_PUC Official Service List General Rate Case |
| Daryl | Maxwell | dmaxwell@hydro.mb.ca | Manitoba Hydro | 360 Portage Ave FL 16 PO Box 815, Station Main Winnipeg, Manitoba R3C 2P4 Canada | Electronic Service | No | OFF_SL_16-664_PUC Official Service List General Rate Case |
| Matthew | McClincy | MMcClincy@usg.com | USG | 35 Arch Street Clouquet, MN 55720 | Electronic Service | No | OFF_SL_16-664_PUC Official Service List General Rate Case |
| Natalie | McIntire | natalie.mcintire@gmail.com | Wind on the Wires | 570 Asbury St Ste 201 Saint Paul, MN 55104-1850 | Electronic Service | No | OFF_SL_16-664_PUC Official Service List General Rate Case |
| Herbert | Minke | hminke@allete.com | Minnesota Power | 30 W Superior St Duluth, MN 55802 | Electronic Service | No | OFF_SL_16-664_PUC Official Service List General Rate Case |
| | | | | | | | |

| First Name | Last Name | Email | Company Name | Address | Delivery Method | View Trade Secret | Service List Name |
|----------------|-----------|-----------------------------|-----------------------------------|----------------------------------------------------------------------------|--------------------|-------------------|-----------------------------------------------------------------|
| David | Moeller | dmoeller@allete.com | Minnesota Power | 30 W Superior St Duluth, MN 558022093 | Electronic Service | Yes | OFF_SL_16-664_PUC Official Service List General Rate Case |
| Andrew | Moratzka | andrew.moratzka@stoel.com | Stoel Rives LLP | 33 South Sixth St Ste 4200 Minneapolis, MN 55402 | Electronic Service | Yes | OFF_SL_16-664_PUC Official Service List General Rate Case |
| James | Mortenson | james.mortenson@state.mn.us | Office of Administrative Hearings | PO BOX 64620 St. Paul, MN 55164-0620 | Electronic Service | No | OFF_SL_16-664_PUC Official Service List General Rate Case |
| David | Niles | david.niles@avantenergy.com | Minnesota Municipal Power Agency | 220 South Sixth Street Suite 1300 Minneapolis, Minnesota 55402 | Electronic Service | No | OFF_SL_16-664_PUC Official Service List General Rate Case |
| 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_16-664_PUC Official Service List General Rate Case |
| Rolf | Nordstrom | rnordstrom@gpisd.net | Great Plains Institute | 2801 21ST AVE S STE 220 Minneapolis, MN 55407-1229 | Electronic Service | No | OFF_SL_16-664_PUC Official Service List General Rate Case |
| Kate | O'Connell | kate.oconnell@state.mn.us | Department of Commerce | Suite 50085 Seventh Place East St. Paul, MN 551012198 | Electronic Service | No | OFF_SL_16-664_PUC Official Service List General Rate Case |
| Kevin | O'Grady | kevin.ogradey@state.mn.us | Public Utilities Commission | Suite 350 121 7th Place East St. Paul, MN 55101 | Electronic Service | No | OFF_SL_16-664_PUC Official Service List General Rate Case |
| Christopher J. | Oppitz | N/A | - | 110 1/2 1ST ST E Park Rapids, MN 56470-1695 | Paper Service | No | OFF_SL_16-664_PUC Official Service List General Rate Case |

| First Name | Last Name | Email | Company Name | Address | Delivery Method | View Trade Secret | Service List Name |
|------------|-----------|---------------------------|-----------------------------------------|------------------------------------------------------------------|--------------------|-------------------|-----------------------------------------------------------------|
| Elanne | Palcich | epalcich@cpinternet.com | Save Our Sky Blue Waters | P.O. Box 3661 Duluth, MN 55803 | Electronic Service | No | OFF_SL_16-664_PUC Official Service List General Rate Case |
| Max | Peters | maxp@cohasset-mn.com | City of Cohasset | 305 NW First Ave Cohasset, MN 55721 | Electronic Service | No | OFF_SL_16-664_PUC Official Service List General Rate Case |
| Jennifer | Peterson | jjpeterson@mnpower.com | Minnesota Power | 30 West Superior Street Duluth, MN 55802 | Electronic Service | No | OFF_SL_16-664_PUC Official Service List General Rate Case |
| William | Phillips | wphillips@aarp.org | AARP | 30 E. 7th St Suite 1200 St. Paul, MN 55101 | Electronic Service | No | OFF_SL_16-664_PUC Official Service List General Rate Case |
| Marcia | Podratz | mpodratz@mnpower.com | Minnesota Power | 30 W Superior S Duluth, MN 55802 | Electronic Service | Yes | OFF_SL_16-664_PUC Official Service List General Rate Case |
| Tolaver | Rapp | Tolaver.Rapp@cliffsnr.com | Cliffs Natural Resources | 200 Public Square Suite 3400 Cleveland, OH 441142318 | Electronic Service | No | OFF_SL_16-664_PUC Official Service List General Rate Case |
| 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_16-664_PUC Official Service List General Rate Case |
| Ralph | Riberich | rriberich@uss.com | United States Steel Corp | 600 Grant St Ste 2028 Pittsburgh, PA 15219 | Electronic Service | No | OFF_SL_16-664_PUC Official Service List General Rate Case |
| Buddy | Robinson | buddy@citizensfed.org | Minnesota Citizens Federation NE | 2110 W. 1st Street Duluth, MN 55806 | Electronic Service | No | OFF_SL_16-664_PUC Official Service List General Rate Case |
| Santi | Romani | N/A | United Taconite | P O Box 180 Eveleth, MN 55734 | Paper Service | No | OFF_SL_16-664_PUC Official Service List General Rate Case |

| First Name | Last Name | Email | Company Name | Address | Delivery Method | View Trade Secret | Service List Name |
|------------|----------------|------------------------------|-----------------------------|-------------------------------------------------------------------|--------------------|-------------------|----------------------------------------------------------------|
| Susan | Romans | sromans@allete.com | Minnesota Power | 30 West Superior Street Legal Dept Duulth, MN 55802 | Electronic Service | No | OFF_SL_16-664_PUC Offical Service List General Rate Case |
| Richard | Savelkoul | rsavelkoul@martinsquires.com | Martin & Squires, P.A. | 332 Minnesota Street Ste W2750 St. Paul, MN 55101 | Electronic Service | No | OFF_SL_16-664_PUC Offical Service List General Rate Case |
| Thomas | Scharff | thomas.scharff@versoco.com | Verso Corp | 600 High Street Wisconsin Rapids, WI 54495 | Electronic Service | No | OFF_SL_16-664_PUC Offical Service List General Rate Case |
| Larry L. | Schedin | Larry@LLSResources.com | LLS Resources, LLC | 332 Minnesota St, Ste W1390 St. Paul, MN 55101 | Electronic Service | No | OFF_SL_16-664_PUC Offical Service List General Rate Case |
| Robert H. | Schulte | rhs@schulteassociates.com | Schulte Associates LLC | 1742 Patriot Rd Northfield, MN 55057 | Electronic Service | No | OFF_SL_16-664_PUC Offical Service List General Rate Case |
| Ann | Schwieger | ann.schwieger@state.mn.us | Public Utilities Commission | 121 7th Place East Suite 350 St. Paul, MN 55101 | Electronic Service | No | OFF_SL_16-664_PUC Offical Service List General Rate Case |
| Britt | See Benes | britt@ci.aurora.mn.us | City of Aurora | 16 W 2nd Ave N PO Box 160 Aurura, MN 55705 | Electronic Service | No | OFF_SL_16-664_PUC Offical Service List General Rate Case |
| Janet | Shaddix Elling | jshaddix@janetshaddix.com | Shaddix And Associates | 7400 Lyndale Ave S Ste 190 Richfield, MN 55423 | Electronic Service | Yes | OFF_SL_16-664_PUC Offical Service List General Rate Case |
| Doug | Shoemaker | dougs@mnRenewables.org | MRES | 2928 5th Ave S Minneapolis, MN 55408 | Electronic Service | No | OFF_SL_16-664_PUC Offical Service List General Rate Case |

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|------------|-----------|--------------------------------|------------------------------------------------------------|------------------------------------------------------------------------------|--------------------|-------------------|-----------------------------------------------------------------|
| Brett | Skyles | Brett.Skyles@co.itasca.mn.us | Itasca County | 123 NE Fourth Street Grand Rapids, MN 557442600 | Electronic Service | No | OFF_SL_16-664_PUC Official Service List General Rate Case |
| Corbin | Smyth | csmyth@d.umn.edu | UMD Student Life | 1208 Kirby Dr Duluth, MN 55812 | Electronic Service | No | OFF_SL_16-664_PUC Official Service List General Rate Case |
| Richard | Staffon | rcstaffon@msn.com | W. J. McCabe Chapter, Izaak Walton League of America | 1405 Lawrence Road Cloquet, Minnesota 55720 | Electronic Service | No | OFF_SL_16-664_PUC Official Service List General Rate Case |
| 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_16-664_PUC Official Service List General Rate Case |
| Eric | Swanson | eswanson@winthrop.com | Winthrop & Weinstine | 225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629 | Electronic Service | No | OFF_SL_16-664_PUC Official Service List General Rate Case |
| Robert | Tammen | bobtammen@frontiernet.net | Wetland Action Group | PO Box 398 Soudan, MN 55782 | Electronic Service | No | OFF_SL_16-664_PUC Official Service List General Rate Case |
| David | Thornton | J.David.Thornton@state.mn.us | MN Pollution Control Agency | 520 Lafayette Road St. Paul, MN 55101 | Electronic Service | Yes | OFF_SL_16-664_PUC Official Service List General Rate Case |
| Jim | Tieberg | jtieberg@polymetmining.com | PolyMet Mining, Inc. | PO Box 475 County Highway 666 Hoyt Lakes, MN 55750 | Electronic Service | No | OFF_SL_16-664_PUC Official Service List General Rate Case |
| Jessica | Tritsch | jessica.tritsch@sierraclub.org | Sierra Club | 2327 E Franklin Ave Minneapolis, MN 55406 | Electronic Service | No | OFF_SL_16-664_PUC Official Service List General Rate Case |
| Karen | Turnboom | karen.turnboom@versoco.com | Verso Corporation | 100 Central Avenue Duluth, MN 55807 | Electronic Service | No | OFF_SL_16-664_PUC Official Service List General Rate Case |

| First Name | Last Name | Email | Company Name | Address | Delivery Method | View Trade Secret | Service List Name |
|------------|-----------|------------------------|-------------------------------------------|---------------------------------------------------------------------------------|--------------------|-------------------|-----------------------------------------------------------------|
| Kodi | Verhalen | kverhalen@briggs.com | Briggs & Morgan | 2200 IDS Center 80 South Eighth Street Minneapolis, Minnesota 55402 | Electronic Service | Yes | OFF_SL_16-664_PUC Official Service List General Rate Case |
| Kevin | Walli | kwalli@fryberger.com | Fryberger, Buchanan, Smith & Frederick | 380 St. Peter St Ste 710 St. Paul, MN 55102 | Electronic Service | No | OFF_SL_16-664_PUC Official Service List General Rate Case |
| Cam | Winton | cwinton@mnychamber.com | Minnesota Chamber of Commerce | 400 Robert Street North Suite 1500 St. Paul, Minnesota 55101 | Electronic Service | No | OFF_SL_16-664_PUC Official Service List General Rate Case |
| 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_16-664_PUC Official Service List General Rate Case |
| Scott | Zahorik | scott.zahorik@aeoa.org | Arrowhead Economic Opportunity Agency | 702 S. 3rd Avenue Virginia, MN 55792 | Electronic Service | No | OFF_SL_16-664_PUC Official Service List General Rate Case |