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October 20, 2016

**VIA ELECTRONIC FILING**

Daniel P. Wolf  
Executive Secretary  
Minnesota Public Utilities Commission  
350 Metro Square Building  
121 Seventh Place East  
St. Paul, MN 55101

RE: In the Matter of the Petition for Approval of the Affiliated Interest Agreement with WEC Energy Group and Minnesota Energy Resources Corporation, Docket No. G011/AI-16-284  
**Reply Comments and Final Order of the Illinois Commerce Commission**

Dear Mr. Wolf:

On April 1, 2016, Minnesota Energy Resources Corporation (MERC or the Company) filed a petition with the Minnesota Public Utilities Commission (Commission) to approve the Affiliated Interest Agreement between WEC Energy Group, Inc. (WEC) and its regulated and non-regulated subsidiaries (the WEC Energy AIA). MERC provides this letter in response to the comments of the Department of Commerce, Division of Energy Resources (Department) submitted on October 17, 2016. Specifically, MERC agrees with the Department's proposed modifications as listed on pages 3-4 of the October 17 comments, including the requirements to (1) inform MERC's affiliates responsible for the treatment of MERC customer data, in writing, that the information about MERC's customers must be treated according to the requirements of the Minnesota Public Utilities Commission, then in effect; and (2) to include in MERC's May 1 annual compliance report a listing of the affiliates receiving MERC customer data, a general description of the data shared, the notice provided to the affiliate, and a discussion of unauthorized release of data, if any occurred. MERC agrees with the Department's proposed modifications and thanks the Department for its review of this Petition.

MERC also submits the final Order of the Illinois Commerce Commission (ICC) approving the WEC Energy AIA. This Order is filed to keep the Commission informed of approvals of the WEC Energy AIA in other jurisdictions. The WEC Energy AIA was filed with the Public Service Corporation of Wisconsin (PSCW) (Docket No. 5-AU-111), the ICC (Docket No. 16-0238), and the Minnesota Commission on April 1, 2016. The PSCW issued its Final Decision approving the WEC Energy AIA on August 29, 2016, and the ICC issued its Order on October 19, 2016.

If you have any questions, please don't hesitate to contact me at 651-322-8965.

Sincerely yours,

/s/ Amber S. Lee

Amber S. Lee

Regulatory and Legislative Affairs Manager

Enclosure

cc: Service List

**STATE OF ILLINOIS**

**ILLINOIS COMMERCE COMMISSION**

**North Shore Gas Company and** :  
**The Peoples Gas Light and Coke Company** :  
 :  
**Petition for an order approving an** :  
**agreement for the provision of facilities** : **16-0238**  
**and services and the transfer of assets** :  
**between affiliates pursuant to Sections** :  
**7-101 and 7-102 of the** :  
**Illinois Public Utilities Act.** :

**ORDER**

By the Commission:

**I. PROCEDURAL HISTORY**

On April 1, 2016, North Shore Gas Company (“North Shore”) and The Peoples Gas Light and Coke Company (“Peoples Gas”) (together, “North Shore/Peoples Gas”) pursuant to Sections 7-101 and 7-102 of the Public Utilities Act (“Act”), filed a Petition with the Illinois Commerce Commission (“Commission”) requesting approval of the Wisconsin Energy Corporation (“WEC”) Energy Affiliated Interest Agreement (the “WEC Energy AIA”). The proposed WEC Energy AIA includes WEC Energy Group, Inc. (“WEC Energy”); WEC Business Services LLC (“WBS”); and all other subsidiaries of WEC Energy, including North Shore and Peoples Gas.

The Petition was supported with the direct testimony and exhibits of William J. Guc, Vice President and Controller of WEC Energy, on behalf of North Shore/Peoples Gas. On September 1, 2016, the Commission Staff (“Staff”) filed the direct testimony of Dianna Hathhorn, an Accountant in the Commission’s Accounting Department of the Financial Analysis Division, and on September 7, 2016, Staff filed an attachment to the testimony that had been inadvertently omitted from the September 1<sup>st</sup> filing.

There were no petitions to intervene filed in this docket.

An evidentiary hearing was held on September 13, 2016. At the hearing, the direct testimony and exhibits of Mr. Guc were admitted into the record. Also at the hearing, the direct testimony and attachment of Ms. Hathhorn were admitted into the record. At the conclusion of the hearing on September 13, 2016, the Administrative Law Judge (“ALJ”) marked the record “Heard and Taken.”

On September 28, 2016, North Shore/Peoples Gas filed an agreed draft Order for Commission consideration.

## **II. LEGAL STANDARD**

North Shore/Peoples Gas filed their Petition under Sections 7-101 and 7-102 of the Act.

Section 7-101 of the Act requires utilities to obtain prior Commission approval of certain arrangements between affiliated interests. Specifically,

No management, construction, engineering, supply, financial or similar contract and no contract or arrangement for the purchase, sale, lease or exchange of any property or for the furnishing of any service, property or thing, hereafter made with any affiliated interest, as hereinbefore defined, shall be effective unless it has first been filed with and consented to by the Commission or is exempted in accordance with the provisions of this Section or of Section 16-111 of this Act. The Commission may condition such approval in such manner as it may deem necessary to safeguard the public interest. If it be found by the Commission, after investigation and a hearing, that any such contract or arrangement is not in the public interest, the Commission may disapprove such contract or arrangement. Every contract or arrangement not consented to or excepted by the Commission as provided for in this Section is void.

220 ILCS 5/7-101(3).

Section 7-102 requires Commission approval of certain agreements and provides that: "Upon the filing of such petition, the Commission shall, if it deems necessary, fix a time and place for the hearing thereon. After such hearing, or in case no hearing is required, if the Commission is satisfied that such petition should reasonably be granted, and that the public will be inconvenienced thereby, the Commission shall make such order in the premises as it may deem proper and as the circumstances may require, attaching such conditions as it may deem proper, and thereupon it shall be lawful to do the things provided for in such order." 220 ILCS 5/7-102(C).

## **III. NORTH SHORE AND PEOPLES GAS' POSITION**

On April 1, 2016, North Shore/Peoples Gas filed with the Commission for approval of the WEC Energy AIA. The proposed WEC Energy AIA is between WEC Energy, which is a public utility holding company; WBS, which was formerly known as Integrys Business Support, LLC, and is a wholly-owned centralized service company subsidiary of WEC Energy; and all other subsidiaries of WEC Energy, including North Shore and Peoples Gas. Mr. Guc explained that the WEC Energy AIA, if approved by this Commission and other state commissions requiring approval, would replace several affiliated interest service agreements. It would replace two existing agreements to which North Shore and Peoples Gas are parties.

Mr. Guc stated that the Public Service Commission of Wisconsin ("PSCW") and the Minnesota Public Utilities Commission ("MPUC") must approve the agreement. The PSCW approval must occur before the agreement may take effect. The MPUC must approve the agreement, but it does not require prior approval.

Mr. Guc explained that this Commission, in Docket No. 14-0496, approved a Reorganization under which WEC acquired Integrys Energy Group, Inc. (“Integrys”). Among other things, the Commission approved an affiliated interest agreement “on an interim basis until the Commission has approved a new affiliated interest agreement in an order in the pending Docket Nos. 12-0273/13-0612 (Consol.); and the resulting affiliated interest agreement approved by the Commission in Docket Nos. 12-0273/13-0612 (Consol.) shall replace the existing 10-0408 AIA as the governing document of affiliated transactions between the Joint Applicants.” Docket No. 14-0496, Order at 102 (June 24, 2015). The “10-0408 AIA” that the Commission referenced was the agreement that the Commission approved in Docket No. 10-0408 under which companies in the Integrys holding company system could provide to and receive from all other companies in the system services described in the agreement, except that the service company would not provide services under this agreement.

The public utility commissions in the States of Michigan, Minnesota, and Wisconsin also approved WEC’s acquisition of Integrys. Mr. Guc explained that the PSCW, in proceedings related to the acquisition docket, addressed the proposed affiliated interest agreement that was before this Commission in Docket No. 14-0496 and two interim agreements under which WBS would provide services to WEC’s legacy regulated and non-regulated subsidiaries. The PSCW orders approving the affiliated interest agreements did so only on an interim basis and established a sunset date of April 1, 2016. In response to the PSCW’s interim approval of the WBS and non-WBS service agreements, WEC Energy prepared the affiliated interest agreement that North Shore/Peoples Gas filed in the instant docket. Mr. Guc explained that this Commission did not approve the interim WBS agreements that the PSCW approved because the legacy Integrys companies, including North Shore and Peoples Gas, are not parties to these agreements. Those agreements cover only WBS’ services to the legacy WEC companies. North Shore/Peoples Gas continue to receive services from WBS under the agreement approved in Docket No. 07-0361.

Mr. Guc stated that, as to North Shore/Peoples Gas, the WEC Energy AIA would replace the following: (1) the agreement that the Commission approved in Docket No. 07-0361, under which WBS provides a broad array of services to the state-regulated utilities in the legacy Integrys holding company system (the “WBS Reg. AIA”); and (2) the agreement that the Commission approved in Docket No. 14-0496, under which all companies in the WEC Energy holding company system may provide to and receive from the other companies in the WEC Energy holding company system (including services to but not from WBS) a broad array of services (the “14-0496 WEC Energy AIA”).

It will also replace three other agreements to which North Shore/Peoples Gas are not parties but under which other companies in the WEC Energy holding company system provide and receive services, namely: (1) the “WBS Non-Reg. AIA” under which WBS provides services to the non-regulated companies in the legacy Integrys holding company system; (2) an agreement under which WBS may provide services to the state-regulated utilities in the legacy WEC holding company system; and (3) an agreement under which WBS may provide services to the non-regulated companies in the legacy WEC holding company system.

Mr. Guc explained that the WEC Energy AIA will not affect other North Shore/Peoples Gas affiliated interest agreements, including the tax allocation agreement that the Commission approved in Docket No. 07-0458 (Order, Dec. 5, 2007); inter-company loan arrangements that the Commission approved in Docket Nos. 02-0822 (Order, Dec. 17, 2002) and 04-0602 and 04-0603 (Orders, Dec. 21, 2004); and a storage service agreement under which Peoples Gas provides service to North Shore that the Commission approved in Docket No. 12-0381 (Order, Jan. 9, 2013).

Mr. Guc stated that the starting point for the proposed WEC Energy AIA was the 14-0496 WEC Energy AIA. The proposed WEC Energy AIA combines and clarifies the five agreements it would replace. Many of the terms and conditions of the agreements are similar. The principal distinctions are the types of services that parties may provide and receive and requirements unique to WBS' status as a centralized service company. The proposed WEC Energy AIA captures the service differences by including appendices that distinguish what services may be provided by what affiliates and on what terms. It addresses the provisions that apply only to WBS by incorporating them in the body of the agreement with clear designations to the extent they apply only to WBS.

Mr. Guc stated that the basic structure of the proposed WEC Energy AIA is comparable to the 14-0496 WEC Energy AIA and WBS Reg. AIA that this Commission previously approved. He then described a few structural, but not substantive, differences such as the addition of a Definitions section and the addition of provisions applicable only to WBS that are substantially similar to provisions in the WBS Reg. AIA but were inapplicable to the 14-0496 WEC Energy AIA. He also stated that the proposed WEC Energy AIA includes several editorial revisions, such as simplification of the Recitals and alphabetizing services and allocators.

Mr. Guc stated that the current agreements and the proposed WEC Energy AIA include appendices and exhibits that describe services and cost allocators. In the proposed WEC Energy AIA, Appendix C covers services that WBS may provide to any party. Appendix D covers services that any party (except WBS, North Shore and Peoples Gas) may provide to any other party (except North Shore and Peoples Gas), but retains distinctions between regulated and non-regulated companies. Appendix E, which is the rider that the Commission adopted in Docket Nos. 12-0273/13-0612 (cons.), covers North Shore and Peoples Gas as providers and recipients of services to and from any party. Appendices A and B identify the regulated and non-regulated parties, respectively.

Mr. Guc explained that many key provisions remain substantively intact. Notably, these include:

- (a) Basic pricing principles are unchanged. Services that WBS provides and receives are priced at cost. Services between Regulated Parties are priced at cost. "Regulated Parties" means North Shore, Peoples Gas and the other state-regulated utilities in the WEC Energy system; the "Non-Regulated Parties" are all the other companies in the WEC Energy system although, for pricing, WBS is treated separately. Services that a Regulated Party receives from a Non-Regulated Party (except WBS) are priced at the lesser of cost or fair market value.

Services that a Regulated Party provides to a Non-Regulated Party (except WBS) are priced at the higher of cost or fair market value.

(b) Reporting requirements remain the same to ensure that the Commission and its Staff receive detailed information about inter-company activity. For example,

- North Shore/Peoples Gas would continue to submit to the Commission WBS' FERC Form 60 and several supplemental schedules to the Commission's Form 21.
- The company would continue to conduct an annual audit and North Shore/Peoples Gas would submit that report to the Commission.
- North Shore/Peoples Gas would continue to submit, annually, billing reports (*i.e.*, charges as service providers and payments as service recipients).

Mr. Guc then described, article-by-article, each section of the proposed agreement.

- The Recitals have been shortened.
- Article I, Definitions, is a new article, but it takes terms used throughout the existing agreements and gathers them in a single article.
- Article II, Provision of Services, is a key substantive provision. It defines the scope of the agreement, which is broadly covering provision of services and transferring and sharing assets; it states that a party may refuse to provide service; it provides for parties documenting their expectations; it states the principle that no Regulated Party needs to take any action that, relative to not acting under the agreement, would impede its ability to serve its customers; and a new subsection clarifies that, if a service could be provided by the service company or by another party, the party receiving the service may determine which party will provide it (assuming both are willing and able to do so). This addresses the inevitable overlap of services that parties may provide. An example is the services that union employees may provide. In this instance, union employees are employees, other than those performing field services, who are covered by collective bargaining agreements. These union employees provide services that the service company (WBS) also provides (for example, payroll and supply chain).
- Article III, Determining Charges for Services Provided, defines charges for services in detail.
- Article IV, Billing and Payment, covers the basic administration function of parties paying for services they receive. The notable proposed change from the comparable provisions in the existing agreements is to expressly state that billing and payment occur electronically through the accounting system.
- Article V, Accounting; Records; Reports, continues to be a key provision in terms of information that the Commission and its Staff will receive about

the agreement. Within the detailed reporting language, North Shore/Peoples Gas proposed, in some subparts, to increase from \$100,000 to \$250,000 the threshold that triggers a specific reporting requirement. The \$100,000 amount was for Integrys. WEC Energy is a much larger company than Integrys, so increasing the trigger is reasonable.

- Article VI, Representations and Warranties of the Parties and Other Obligations of WBS, covers some customary legal representations and is also where some requirements specific to WBS were included.
- Article VII, Indemnity and Liability, covers customary legal terms and conditions.
- Article VIII, Additional Provisions, covers several miscellaneous terms and conditions that do not fit within the articles described above. For example, the proposed effective date of the agreement would be the first day of the quarter following receipt of all necessary approvals or waivers. The article details how changes to appendices would occur, and this language is substantially what exists in the 14-0496 WEC Energy AIA and the WBS Reg. AIA.
- Appendix A lists the regulated parties, *i.e.*, the seven regulated public utilities in the WEC Energy holding company system.
- Appendix B lists the non-regulated parties. It does not list every non-regulated party but covers the holding company, WBS and all the parties that are not regulated parties.
- Appendix C describes in detail the services that WBS provides and the applicable cost allocators. It is comparable to, and based on, Exhibits B and C of the WBS Reg. AIA. The proposed WEC Energy AIA includes many editorial changes but only a few substantive changes. Some significant differences are that names are changed to reflect the WEC Energy organization (*e.g.*, “Gas Supply,” a service available only to regulated parties, would be renamed “Wholesale Energy and Fuels” and include gas and energy procurement). In the listing of allocators, several categories are consolidated. For example, “Number of Customers,” “Number of Employees,” “Number of Transactions,” and “Number of Devices” cover what are multiple categories in the current agreement. The allocator “Hydro MW Distribution” would be replaced with the more general “Megawatts (MW).” This more general allocator is relevant to environmental, operational and fuel procurement services. Wording for when and how the allocators are determined is also standardized when possible.
- Appendix D does not apply to North Shore and Peoples Gas.
- Appendix E applies when North Shore or Peoples Gas is a service provider or recipient. It resulted from the Docket Nos. 12-0273/13-0612 (cons.) matter. In general, Appendix E is a more detailed version of Appendix D. Notable changes are:
  - In the operational support services (electric and gas) that a Regulated Party may provide to another Regulated Party, “training” is



added. Currently, the services focus on day-to-day work, but training to perform that work is an integral part of operational support. Operational training is also a service that a Regulated Party employee is apt to provide although service company employees may also provide training.

- “Administrative and Maintenance” and “Project Assistance (IT)” are moved from incidental to major services. This reflects the potential significance of work that could occur in these categories.

- North Shore/Peoples Gas previously added the category of “Represented Employees” as a service that a Regulated Party may provide to another Regulated Party. The intent was for represented employees at a utility who provided the types of services that, under legacy Integrys, service company employees would have provided, to be able to provide that service to all utilities in the system and not just their employer. (It is unrelated to union employees at the utilities who provide operational services, which were, and continue to be, covered by other provisions in the agreement.) North Shore/Peoples Gas propose to rename this, for clarity, as “Union Employees” and to add it as a service that a Non-Regulated Party may provide to a Regulated Party. This category is not a “service” as such, but it reflects the potential that union employees may exist in any of the companies and moving them to the service company is likely not feasible under collective bargaining agreements. Currently, this is a situation that exists at certain regulated utilities, but, in the future, it could exist at a non-regulated affiliate.

- “claims management” is added to “Customer” service. This reflects the WEC Energy organization design in which claims management is not within Legal and Governance but is part of the Customer area.

- in the description of “Cost Allocations,” a definition of “management” is proposed. The term is currently used, but not defined, and a definition would remove any ambiguity about what cost allocations may cover. Also within this category, all the Wisconsin utilities are listed with respect to intercompany loans.

- the audit section includes proposed revisions to reflect changes in the organization. Specifically, the non-regulated businesses for WEC Energy are a quite small part of the organization. The regulated business (together with the regulated, but non-utility, subsidiary We Power) accounts for about 99% of the corporation’s income. WEC Energy has no retail marketing affiliate. WEC Energy recently divested the legacy Integrys non-regulated compressed natural gas (CNG) business segment. Overwhelmingly, the non-regulated entities are in the electric energy business and not in the natural gas business. North Shore/Peoples Gas employees have few, if any, support services to offer these entities, and North

Shore/Peoples Gas have few assets that would be of value to these entities.

Mr. Guc concluded by stating that the proposed WEC Energy AIA is in the public interest, and it will be a matter of public convenience once it is approved. It is a service agreement that combines the terms and conditions of existing agreements and will replace five existing agreements. It relies on the existing affiliated interest agreements for key terms and conditions defining pricing as well as customary contract terms and conditions. This reliance ensures consistency in how the regulated utilities receive and provide services.

He stated that the proposed agreement addresses changes stemming from the new WEC Energy organization, noting that WEC Energy includes a centralized service company, which was not part of WEC but was an integral part of Integrys. As the two organizations continue to combine their operations, including the accounting systems that will support the agreement, what services will be provided by what entities and how cost is determined (e.g., what components will constitute overhead) continue to develop. The proposed agreement recognizes that some work remains in progress.

Importantly, according to Mr. Guc, the proposed WEC Energy AIA retains the many current reporting and audit requirements that will continue to provide the Commission with a complete and detailed record of transactions among the WEC Energy companies, including North Shore/Peoples Gas. The amount of information available to the state utility commissions will continue to be substantial and will assist them in overseeing activity under the agreement.

#### **IV. STAFF'S POSITION**

Staff witness Ms. Hathhorn described the proceeding and the purposes of the proposed WEC Energy AIA. She concluded that based upon her review, nothing has come to her attention which causes her to propose any changes to the WEC Energy AIA. Accordingly, Ms. Hathhorn had no objection to the Commission approving it. Ms. Hathhorn also attached to her direct testimony a data request response that summarized the affiliated interest agreements to which North Shore or Peoples Gas or both will remain in effect, and those agreements which will no longer be in effect. Staff Ex. 1.0, Attach. A. Further, Ms. Hathhorn recommended that the Commission in its final order, direct North Shore/Peoples Gas to file a copy of the signed, executed agreement on the Commission's e-Docket system in Docket No. 16-0238, and send a copy of the same to AccountingMgr@icc.illinois.gov.

#### **V. COMMISSION ANALYSIS AND CONCLUSION**

The Commission concludes that the WEC Energy AIA is in the public interest and it will be a matter of public convenience once it is approved. The agreement is based on agreements that the Commission previously approved. Key provisions from those previously approved agreements are maintained. North Shore/Peoples Gas provided sufficient support for modifications to the previously approved terms and conditions, and the modifications are reasonable.

#### **VI. FINDINGS AND ORDERING PARAGRAPHS**

The Commission, having considered the entire record and being fully advised in the premises, is of the opinion and finds that:

- (1) North Shore Gas Company is an Illinois corporation engaged in the distribution of natural gas to the public in the State of Illinois and, as such, is a public utility within the meaning of the Public Utilities Act;
- (2) The Peoples Gas Light and Coke Company is an Illinois corporation engaged in the distribution of natural gas to the public in the State of Illinois and, as such, is a public utility within the meaning of the Public Utilities Act;
- (3) the Commission has jurisdiction over North Shore and Peoples Gas and of the subject matter of this proceeding;
- (4) the recitals of fact and the conclusions reached in the prefatory portion of this Order are supported by the record and are hereby adopted as findings of fact;
- (5) North Shore and Peoples Gas filed a Petition pursuant to Sections 7-101 and 7-102 of the Public Utilities Act requesting approval of an affiliated interest agreement under which North Shore, Peoples Gas and their affiliated interests would provide and receive services;
- (6) Staff recommended that the Commission, in its final order, direct North Shore/Peoples Gas to file a copy of the signed, executed agreement on the Commission's e-Docket system in Docket No. 16-0238, and send a copy of the same to AccountingMgr@icc.illinois.gov;
- (7) upon the effective date of the WEC Energy AIA, the Master Regulated Affiliated Interest Agreement approved in Docket No. 07-0361 and the WEC Energy Group Affiliated Interest Agreement, approved in Docket No. 14-0496, as amended in Docket No. 12-0273/13-0612 (cons.), are no longer in effect; and
- (8) all motions, petitions, objections or other matters in this proceeding which remain undisposed of should be disposed of consistent with the conclusions herein.

IT IS THEREFORE ORDERED by the Illinois Commerce Commission that, pursuant to Sections 7-101 and 7-102 of the Act, consent and approval to the entry by Peoples Gas and North Shore into the WEC Energy AIA, submitted in evidence as NSG-PGL Ex. 1.1, is granted.

IT IS FURTHER ORDERED that authority to perform all acts necessary in performance of the WEC Energy AIA that are not contrary to the Act and the Commission's rules and regulations is granted.

IT IS FURTHER ORDERED that within sixty (60) days of the receipt of all regulatory approvals required for the Agreement to take effect, North Shore and Peoples Gas shall file a fully executed copy of the Agreement on the Commission's e-Docket system in Docket No. 16-0238, and send a copy of the same to AccountingMgr@icc.illinois.gov, and, if such executed agreement is not available within

six (6) months of the Order date in this proceeding, North Shore and Peoples Gas shall file a status report, providing a copy to the Commission's Manager of Accounting.

IT IS FURTHER ORDERED that, upon the effective date of the WEC Energy AIA, the Master Regulated Affiliated Interest Agreement approved in Docket No. 07-0361 and the WEC Energy Group Affiliated Interest Agreement, approved in Docket No. 14-0496, as amended in Docket No. 12-0273/13-0612 (cons.) are no longer in effect.

IT IS FURTHER ORDERED that any objections, motions or petitions filed in this proceeding that remain unresolved should be disposed of in a manner consistent with the ultimate conclusions contained in this Order.

IT IS FURTHER ORDERED that subject to the provisions of Section 10-113 of the Public Utilities Act and 83 Ill. Adm. Code 200.880, this Order is final; it is not subject to the Administrative Review Law.

By Order of the Commission this 19<sup>th</sup> day of October, 2016.

(SIGNED) BRIEN SHEAHAN

Chairman

In the Matter of the Petition for Approval of  
the Affiliated Interest Agreement with WEC  
Energy Group, Inc. and Minnesota Energy  
Resources Corporation

Docket No. G011/AI-16-284

CERTIFICATE OF SERVICE

I, Kristin M. Stastny, hereby certify that on the 20th of October, 2016, on behalf of Minnesota Energy Resources Corporation (MERC), I electronically filed a true and correct copy of the enclosed Reply Comments on [www.edockets.state.mn.us](http://www.edockets.state.mn.us). Said documents were also served via U.S. mail and electronic service as designated on the attached service list.

Dated this 20th day of October, 2016.

/s/ Kristin M. Stastny  
Kristin M. Stastny

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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_16-284_AI-16-284
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_16-284_AI-16-284
Mary	Klyasheff	MPKlyasheff@integrysgroup.com	WEC Eenergy Group, Inc.	200 East Randolph St  Chicago, IL 60601	Electronic Service	No	OFF_SL_16-284_AI-16-284
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_16-284_AI-16-284
Amber	Lee	ASLee@minnesotaenergyresources.com	Minnesota Energy Resources Corporation	2665 145th St W  Rosemount, MN 55068	Electronic Service	No	OFF_SL_16-284_AI-16-284
John	Lindell	john.lindell@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_16-284_AI-16-284
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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_16-284_AI-16-284