MINNESOTA DEPARTMENT OF COMMERCE

85 7TH PLACE EAST, SUITE 500
SAINT PAUL, MINNESOTA 55101-2198
MN.GOV/COMMERCE
651.539.1500 FAX: 651.539.1547
AN EQUAL OPPORTUNITY EMPLOYER

December 1, 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. G011/M-14-661

Dear Dr. Haar:

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

> A request by Minnesota Energy Resources Corporation (MERC or the Company) for approval by the Minnesota Public Utilities Commission (Commission) of a change in demand entitlement for its customers served off of the Consolidated system effective in the Purchased Gas Adjustment (PGA) on November 1, 2014.

The filing was submitted on August 1, 2014. The filing was updated on November 3, 2014. The petitioner is:

> Amber S. Lee
> Minnesota Energy Resources Corporation
> 2665 145th Street West
> Rosemount, MN 55068

Based on its investigation, the Department recommends that the Commission:

- **accept** MERC-PNG's peak-day analysis with the caveat that the Department cannot fully verify the results of MERC's analysis as mentioned herein;
- **approve** MERC-PNG's proposed level of demand entitlement and proposed recovery of associated demand costs effective November 1, 2014, contingent on the Company providing in its *Reply Comments* clarification on its Petition as requested herein by the Department.

The Department will provide its final recommendations after reviewing MERC's Reply Comments and is available to answer any questions that the Commission may have.

Sincerely,

/s/ SACHIN SHAH
Rates Analyst

SS/ja
Attachment

MINNESOTA DEPARTMENT OF COMMERCE

BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

COMMENTS OF THE
MINNESOTA DEPARTMENT OF COMMERCE
DIVISION OF ENERGY RESOURCES

DOCKET NO. G011/M-14-661

I. SUMMARY OF COMPANY'S PROPOSAL

Pursuant to Minnesota Rules 7825.2910, subpart 2, Minnesota Energy Resources Corporation- (MERC or the Company) filed a change in demand entitlement petition (Petition) on August 1, 2014 for its customers served off of the Consolidated system.[1] The MERC-Consolidated customers are served from three transmission pipelines: Great Lakes Gas Transmission, L.P. (GLGT), Viking Gas Transmission Co. (Viking), and Centra Pipeline Minnesota, Inc. (Centra). In its Petition, MERC requests that the Minnesota Public Utilities Commission (Commission) accept the following changes in the Company's overall level of contracted capacity.[2]

Table 1

The Company's Proposed Total Entitlement Changes	
Type of Entitlement	Proposed Changes: increase (decrease) (Dkt)[3]
Viking FA-A Zone 1-1	(1,500)
Total Entitlement Net Change	**(1,500)**

For Viking capacity, MERC proposed to reduce its FA-A Zone 1-1 Contract AF0203 by 1,500 from 1,500 to 0.[4] There is no planned change in winter capacity on either GLGT or Centra.[5]

[1] In its July 1, 2013 rearrangement of Purchased Gas Adjustment (PGA) four systems, MERC named the PGA for the NNG customers "MERC-NNG." MERC's other PGA system was named "MERC-Consolidated." On August 1, 2014, MERC filed a demand entitlement request for MERC-NNG in Docket No. G011/M-14-660.

[2] MERC notes in its August 1, 2014 cover letter that any updated information will be provided with its November 1, 2013 filing.

[3] Dekatherms (Dkt).

As discussed further below, MERC's projected 2014-2015 design-day requirements (overall needs of its firm customers on a design day) decreased by 1,342 Dkt (or approximately 2.68 percent) from the previous year.

MERC-Consolidated has gas storage with AECO, located in Calgary, Canada. To deliver the supply from storage to the MERC-Consolidated customers, MERC enters into a swap where MERC sells gas at the AECO storage point to a supplier and buys an equivalent volume at Emerson/Spruce which MERC then transports to its customers. According to MERC, the swap substitutes the need to contract for firm transport on TransCanada pipeline (TCPL) to transport the gas from AECO to Emerson/Spruce.

In its November 3rd, 2014 update to the filing, MERC stated that it plans to enter into an AECO/ Emerson swap and that there are no planned changes in swap volumes from the previous year. MERC also stated that, "once it has revised design day numbers, this may change and will be revised in the November 1, 2014 filing." The Minnesota Department of Commerce, Division of Energy Resources (Department or DOC) discusses the AECO Storage below.

The Department concludes that MERC's proposed change appears to be reasonable, based on current information, but seeks additional details, confirmation and clarification from MERC in their *Reply Comments*. As discussed below, the effect of the above proposed change is a decrease in demand costs for the General Service and Large General Service customers.

II. THE DEPARTMENT'S ANALYSIS OF THE COMPANY'S PROPOSAL

The Department's analysis of the Company's request includes the:

- changes to capacity;
- design-day requirement;
- reserve margin; and
- PGA cost recovery proposal.

---

[4] MERC stated in its August 1, 2014 Petition that it anticipated purchasing 1,500 Dkt firm winter (December 2014 through February 2015) capacity from Viking, however, Viking has no firm capacity to sell. The current Petition reflects the decrease of 1,500 Dkt capacity.

[5] Petition, page 12.

A. MERC'S PROPOSED CHANGES

1. Capacity

As indicated in DOC Attachments 1 and 2, the Company proposed to decrease its total entitlement level in Dkt as follows:

Table 2

Filing	Previous Entitlement (Dkt)	Proposed Entitlement (Dkt)	Entitlement Changes (Dkt)	Change From Previous Year (%)
Aug 1, 2014	52,959	52,959	0	0%
Nov 3, 2014	52,959	51,459	(1,500)	-3.64%

In the current filing, MERC decreased its Viking Capacity by 1,500 Dkt. As discussed below, the design day decreased by 1,342 Dkt. As also discussed below, MERC-Consolidated's reserve margin appears to be reasonable. However, the Department seeks additional information regarding MERC's reserve margin on Viking, which is negative as discussed below. Therefore, while MERC's proposal appears to be reasonable, the Department seeks additional details, confirmation and clarification from MERC in their *Reply Comments* regarding the reserve margin on Viking pipeline and the proposed levels of capacity and costs as discussed below.

2. Design-Day Requirement

As indicated in DOC Attachment 2, the Company proposed to decrease its total design day in Dkt as follows:

Table 3

Filing	Previous Design Day (Dkt)	Proposed Design Day (Dkt)	Design Day Changes (Dkt)	Change From Previous Year (%)
Aug 1, 2014	50,048	50,048	0	0
Nov 3, 2014	50,048	48,706	(1,342)	-2.68

MERC provided significant discussion regarding its design-day calculation. The Department notes that the Company's design-day analysis is similar to the process that it has used in prior demand entitlement filings. However, MERC performed regressions by pipeline in the present docket. Considering the July 1, 2013 rearrangement/consolidation of MERC's Viking, GLGTs, and Centra entitlements and design day estimates, this approach seems reasonable. The Department requests that MERC indicate in *Reply Comments* whether it is possible for all of the demand volumes on these three pipelines to serve the firm customers who are charged for these costs.

MERC once again explored the use of additional weather variables in its review of other design-day regression models but did not use the variables in the Company's final design-day analysis. The Department does not oppose MERC's evaluation of other weather determinants in its efforts to produce the most robust design-day estimates possible; however, the Department also notes that some of these additional data were taken from a proprietary source as was discussed in the Department's January 3rd, 10th, and March 12th, 2012 *Comments* in Docket Nos. G011/M-11-1082, G011/M-11-1083, and G011/M-11-1084, respectively. When a utility uses proprietary data in its analysis, the Department cannot fully verify that the results of the analysis are correct.

The Department notes that MERC appropriately corrected its models for autocorrelation, as was discussed in the Department's March 4th, 2013 *Comments* in Docket Nos. G011/M-12-1192, G011/M-12-1193, G011/M-12-1194 and G011/M-12-1195 wherein the Department requested that, in future demand entitlement filings, MERC check the regression models it ultimately uses for autocorrelation and correct the model if autocorrelation is present. The Department appreciates MERC's attention to this issue.

The Department recommends that the Commission accept MERC-PNG's peak-day analysis with the caveat that the Department cannot fully verify the results of MERC's analysis as mentioned above.

3. *Reserve Margin*

As indicated in DOC Attachment 2, the proposed reserve margin is 2,911 Dkt as follows:

Table 4

Filing	Total Entitlement (Dkt)	Design-day Estimate (Dkt)	Difference (Dkt)	Reserve Margin %	% Change From Previous Year
Aug 1, 2014	52,959	50,048	2,911	5.82	-0.71
Nov 3, 2014	51,459	48,706	2,753	5.65	-0.17

The proposed reserve margin of 5.65 percent represents a decrease of 0.17 percent over last year's reserve margin of 5.82 percent.[6] The proposed reserve margin, at slightly over five percent, is reasonable considering the July 1, 2013 rearrangement or consolidation of MERC's Viking, GLGTs, and Centra entitlements.

---

6 MERC's Attachment 3.

However, in its Petition MERC states that a subsection of that total, for Viking, has a Design Day requirement of 15,858 Dkt compared to the Design Day capacity of 15,591 Dkt, resulting in a negative 1.68 percent reserve margin.[7] The issues with Viking are a concern given the issues that arose last year during the Polar Vortex and the concurrent explosion on the TransCanada pipeline. Since Northern States Power, d/b/a Xcel Energy also faced supply problems last year, the Department includes the following information from Xcel in its initial August 1, 2014 filing in Docket No. G002/M-14-654 (Attachment 1, page 6 of 9):

> …Lastly, we made two contract changes to provide additional supply diversity and system reliability on Viking. Currently, Viking flows south from Emerson, MN, the interconnect between TransCanada and Viking, to Marshfield, WI, the interconnect between Viking and ANR Pipeline. Viking initiated a construction project to facilitate the increased flow of natural gas on Viking north from Marshfield. A bi-directional Viking system benefits us and other shippers in two ways. First, bi-directionality allows greater gas supply flexibility by providing greater access to the liquid natural gas supply hub near Chicago, IL through Viking's Marshfield interconnection. Second, bi-directionality improves reliability in the event a single point of receipt is lost from service. Such an event occurred in January 2014 when a rupture occurred on TransCanada cutting off all natural gas supplies at Emerson for a couple of days. Additional supply sources at Marshfield will reduce our dependence on gas supplies at Emerson. Viking indicates that the new facilities will be ready for service by November 1, 2014.
>
> To support the construction of these facilities, we agreed to two contract changes. First, we extended Viking contract AF0156, by an additional 26 months from the original expiration date in 2017. This contract has primary delivery points at Green Lake, Chisago (Minneapolis/St. Paul through Northern), Pierz (St. Cloud and Brainerd), and Fargo/Moorhead. Second, we agreed to enter into a new contract for an incremental 15,000 Dth/day of year-round capacity with a Marshfield receipt point.

In addition, in its Supplemental Filing dated October 31, 2014 in Docket No. G002/M-14-654, Xcel Energy stated the following at page 2:

> In the Petition, we planned to purchase 10,646 Dth/day of firm, winter-only capacity on Viking Gas Transmission (Viking) to supplement our total design day capacity of 856,048 Dth/day.

[7] Petition at page 3. MERC's Attachments 1 and 4.

> Viking informed us in mid- October that incremental capacity will not be available this coming heating season because of pressure restrictions imposed by the Pipeline and Hazardous Materials Safety Administration (PHMSA) related to a Viking pipeline rupture that occurred last May. Viking is required to reduce its operating pressure while the pipeline undergoes safety testing. The reduced pressure decreases the amount of gas that can be transported by Viking; hence no incremental capacity can be acquired at this time.
>
> We studied several short-term options to replace this capacity and elected to subscribe to additional capacity on Northern Natural Gas (Northern) as the most flexible option. We purchased all of the available capacity on Northern from Carlton, MN to Chisago, MN to offset the need for additional capacity on Viking. This 5,629 Dth/day of capacity will provide for supply receipts from Great Lakes Gas Transmission at Carlton redelivered to Chisago for ultimate distribution within NSPM's Northern Minnesota service areas.

That is, although the Consolidated reserve margin is reasonable, MERC's Viking pipeline reserve margin is negative. As a result, the Department requests additional details, confirmation and clarification from MERC in their *Reply Comments* as follows:

- How MERC expects to serve its firm customers reliably given the negative Viking pipeline reserve margin and the Viking pipeline situation based on the pressure restrictions and PHMSA action described above;

- MERC's perspective on the bi-directional Viking system; and

- MERC's perspective on whether the Viking pipeline situation and related PHMSA action contributed to its decision to do the regression analysis by pipeline.

Based on the above information and the Department's analysis of the Company's design-day analysis, the Department concludes that the consolidated reserve margin is reasonable at this time. However, given the request for additional details, confirmation and clarification from MERC in their *Reply Comments*, the Department concludes that approval of MERC-Consolidated's proposed level of demand entitlement and the proposed level of capacity must be contingent on MERC providing satisfactory responses to the issues above regarding reliable service for customers served from the Viking pipeline.

C. THE COMPANY'S PGA COST RECOVERY PROPOSAL

In its Petition, the Company compared its October 2014 PGA to its November 2014 PGA to highlight its changes in demand costs (MERC Attachment 4, Page 1 of 3). The Company's demand entitlement proposal would result in the following annual demand cost impacts:

- Annual bill decrease of $0.0439 related to demand costs, or approximately 5.11 percent, for the average General Service customer consuming 93 Dkt annually;
- Annual bill decrease of $0.0439 related to demand costs, or approximately 5.11 percent, for the average Large General Service customer consuming 5,383 Dkt annually;
- no demand cost impacts related to MERC-Consolidated's interruptible rate classes.

In MERC's Attachment 4, page 2 of 3, the pipeline rates for Viking, Centra and AECO all changed. In addition, in MERC's Attachment 6, MERC shows a decrease of 7,395 Dkt in the AECO/ Emerson Swap. However, the AECO (Niska) Storage entitlement amounts in both its Attachment 4 and the PGA mentioned below do not change. MERC did not provide detailed explanations on all of these changes in its Petition.

In its November PGA filed in Docket No. G011/AA-14-939, MERC did not provide the relevant Federal Energy Regulatory Commission (FERC) pipeline tariff sheets showing the changes in the pipeline rates for Viking, Centra and AECO. In addition, MERC did not provide any detailed explanations.

As a result, the Department requests that MERC provide additional details and clarification in their *Reply Comments* regarding the pipeline rates for Viking, Centra and the AECO/Emerson Swap entitlement amounts and rates.

In addition, the Department requests MERC supplement its November PGA filing in Docket No. G011/AA-14-939 with the relevant FERC pipeline tariff sheets and associated details/clarifications for Viking, Centra and the AECO/Emerson Swap entitlement amounts and rates.

III. THE DEPARTMENT'S RECOMMENDATIONS

Based on its investigation, the Department recommends that the Commission:

- accept MERC Consolidated' s peak-day analysis with the caveat that the Department cannot fully verify the results of MERC's analysis as mentioned above;

- approve MERC- Consolidated' s proposed level of demand entitlement, with the proposed recovery of associated demand costs effective November 1, 2014, contingent on the Company providing in its *Reply Comments* additional details, confirmation and clarification on its Petition as requested herein for the following items:

    - explanations on how MERC intends to serve its firm customers reliably given the negative Viking pipeline reserve margin and the Viking pipeline situation based on the pressure restrictions and PHMSA action described above;

    - MERC's perspective on the bi-directional Viking system;

    - MERC's perspective on whether the Viking pipeline situation and related PHMSA action contributed to its decision to do the regression analysis by pipeline;

    - additional details and clarification in their *Reply Comments* regarding the pipeline rates for Viking, Centra and the AECO/Emerson Swap entitlement amounts and rates; and

    - supplement its November PGA filing in Docket No. G011/AA-14-939 with the relevant FERC pipeline tariff sheets and associated details/clarifications for Viking, Centra and the AECO/Emerson Swap entitlement amounts and rates.

The Department will provide its final conclusion regarding the Company's proposed recovery of overall demand costs and the proposed level of entitlements after reviewing the Company's *Reply Comments*.

/ja

Department Attachment 1
Docket No. G011/M-14-661
MERC-Consolidated's Demand Entitlement Historical and Current Proposal

Source: MERC's Attachment 6 2012-2013 Heating Season	Quantity (Mcf)	2013-2014 Heating Season	Quantity (Mcf)	2014-2015 Heating Season	1-Aug 2014 Quantity (Mcf)	1-Aug 2014 Change in Quantity	1-Nov 2014 Quantity (Mcf)	1-Nov 2014 Change in Quantity
FT Western Zone annual	10,130	FT Western Zone annual	10,130	FT Western Zone annual	10,130	0	10,130	0
FT Western Zone (12) annual	3,600	FT Western Zone (12) annual	3,600	FT Western Zone (12) annual	3,600	0	3,600	0
FT Western Zone (5) winter	3,638	FT Western Zone (5) winter	3,638	FT Western Zone (5) winter	3,638	0	3,638	0
FT Western Zone annual	9,000	FT Western Zone annual	9,000	FT Western Zone annual	9,000	0	9,000	0
FT-A Zone 1 - 1 annual	12,493	FT-A Zone 1 - 1 annual	12,493	FT-A Zone 1 - 1 annual	12,493	0	12,493	0
FT-A Zone 1 - 1 winter	1,098	FT-A Zone 1 - 1 winter	1,098	FT-A Zone 1 - 1 winter	1,098	0	1,098	0
FT-A Zone 1 - 1 annual	2,000	FT-A Zone 1 - 1 annual	2,000	FT-A Zone 1 - 1 annual	2,000	0	2,000	0
FA-A Zone 1 - 1 annual	0	FA-A Zone 1 - 1 annual	1,500	FA-A Zone 1 - 1 annual	1,500	0	0	(1,500)
Wadena Delivered GDD Call Option	3,500	Wadena Delivered GDD Call Option	0	Wadena Delivered GDD Call Option	0	0	0	0
Centra FT - 1 annual	9,500	Centra FT - 1 annual	9,500	Centra FT - 1 annual	9,500	0	9,500	0
Total Design Day Capacity	54,959	Total Design Day Capacity	52,959	Total Design Day Capacity	52,959	0	51,459	(1,500)
Total Transportation	54,959	Total Transportation	52,959	Total Transportation	52,959	0	51,459	(1,500)
Total Annual Transportation	46,723	Total Annual Transportation	46,723	Total Annual Transportation	46,723	0	46,723	0
Total Seasonal Transport	4,736	Total Seasonal Transport	4,736	Total Seasonal Transport	4,736	0	4,736	0
Percent Seasonal	8.6%	Percent Seasonal	8.9%	Percent Seasonal	8.9%	0	9.2%	0

Department Attachment 2
Docket No. G011/M-14-661
Demand Entitlement Analysis

MERC-Consolidated Demand Entitlement Analysis

	Number of Firm Customers			Design-Day Requirement			Total Entitlement Plus Peak Shaving			Reserve Margin	
Heating Season*	(1) Number of Customers	(2) Change from Previous Year	(3) % Change From Previous Year	(4) Design Day (Dth)	(5) Change from Previous Year	(6) % Change From Previous Year	(7) Total Design-Day Capacity (Dth)	(8) Change from Previous Year	(9) % Change From Previous Year	(10) Reserve (7) - (4)	(11) % of Reserve [(7)-(4)]/(4)
2014-2015	34,397	390	1.15%	48,706	(1,342)	-2.68%	51,459	(1,500)	-2.83%	2,753	5.65%
2013-2014	34,007	0	0.00%	50,048	(2,241)	-4.29%	52,959	(2,000)	-3.64%	2,911	5.82%
2012-2013*	34,007			52,289			54,959				
Average:			0.57%			-3.48%			-3.24%		5.73%

* 2012-2013 figures are from MERC-Consolidated Attachment 3, page 1 of 1.

	Firm Peak-Day Sendout						
Heating Season*	(12) Firm Peak-Day Sendout (Dth)	(13) Change from Previous Year	(14) % Change From Previous Year	(15) Excess per Customer [(7) - (4)]/(1)	(16) Design Day per Customer (4)/(1)	(17) Entitlement per Customer (7)/(1)	(18) Peak-Day Send per Customer (12)/(1)
2014-2015	unknown			0.0800	1.4160	1.4960	unknown
2013-2014	38,906			0.0856	1.4717	1.5573	1.144058576
Average			#DIV/0!	0.0828	1.4438	1.5267	1.1441

CERTIFICATE OF SERVICE

I, Linda Chavez, hereby certify that I have this day served copies of the following document on the attached list of persons by electronic filing, 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 Nos. **G011/M-14-661**

Dated this **1st** day of **December, 2014**.

/s/Linda Chavez

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 Minneapolis, MN 554021498	Electronic Service	No	OFF_SL_14-661_M-14-661
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_14-661_M-14-661
Michael	Bradley	mike.bradley@lawmoss.com	Moss & Barnett	150 S. 5th Street, #1200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_14-661_M-14-661
Seth	DeMerritt	ssdemerritt@integrysgroup.com	Integrys Business Support	700 North Adams P.O. Box 19001 Green Bay, WI 543079001	Electronic Service	No	OFF_SL_14-661_M-14-661
Ian	Dobson	ian.dobson@ag.state.mn.us	Office of the Attorney General-RUD	Antitrust and Utilities Division 445 Minnesota Street, 1400 BRM Tower St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_14-661_M-14-661
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_14-661_M-14-661
Daryll	Fuentes	N/A	USG	550 W. Adams Street Chicago, IL 60661	Paper Service	No	OFF_SL_14-661_M-14-661
Burl W.	Haar	burl.haar@state.mn.us	Public Utilities Commission	Suite 350 121 7th Place East St. Paul, MN 551012147	Electronic Service	Yes	OFF_SL_14-661_M-14-661
Robert	Harding	robert.harding@state.mn.us	Public Utilities Commission	Suite 350 121 7th Place East St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_14-661_M-14-661
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	No	OFF_SL_14-661_M-14-661

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Harry W	John	HWJohn@integrysgroup.com	MERC, Integrys	700 North Adams PO Box 19001 Green Bay, WI 54307-9001	Electronic Service	No	OFF_SL_14-661_M-14-661
David G.	Kult	dgkult@minnesotaenergyresources.com	Minnesota Energy Resources Corporation	2665 145th St. NW Rosemount, MN 55068	Electronic Service	No	OFF_SL_14-661_M-14-661
David	Kyto	djkyto@integrysgroup.com	Integrys Business Support	700 North Adams PO Box 19001 Green Bay, WI 543079001	Electronic Service	No	OFF_SL_14-661_M-14-661
Amber	Lee	ASLee@minnesotaenergyresources.com	Minnesota Energy Resources Corporation	2665 145th Street West Rosemount, MN 55068	Electronic Service	No	OFF_SL_14-661_M-14-661
John	Lindell	agorud.ecf@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012130	Electronic Service	Yes	OFF_SL_14-661_M-14-661
Eric	Lipman	eric.lipman@state.mn.us	Office of Administrative Hearings	PO Box 64620 St. Paul, MN 551640620	Electronic Service	Yes	OFF_SL_14-661_M-14-661
Peter	Madsen	peter.madsen@ag.state.mn.us	Office of the Attorney General-DOC	Bremer Tower, Suite 1800 445 Minnesota Street St. Paul, Minnesota 55101	Electronic Service	No	OFF_SL_14-661_M-14-661
Chad T	Marriott	ctmarriott@stoel.com	Stoel Rives LLP	900 SW 5th Ave Ste 2600 Portland, OR 97204	Electronic Service	No	OFF_SL_14-661_M-14-661
Brian	Meloy	brian.meloy@stinsonleonard.com	Stinson,Leonard, Street LLP	150 S 5th St Ste 2300 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_14-661_M-14-661
Andrew	Moratzka	apmoratzka@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_14-661_M-14-661

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Barbara	Nick	banick@integrysgroup.com	Minnesota Energy Resources Corporation	2665 145th Street PO Box 455 Rosemount, MN 55068-0455	Electronic Service	No	OFF_SL_14-661_M-14-661
Richard	Savelkoul	rsavelkoul@martinsquires.com	Martin & Squires, P.A.	332 Minnesota Street Ste W2750 St. Paul, MN 55101	Electronic Service	No	OFF_SL_14-661_M-14-661
Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates	Ste 122 9100 W Bloomington Frwy Bloomington, MN 55431	Electronic Service	Yes	OFF_SL_14-661_M-14-661
Kristin	Stastny	stastny.kristin@dorsey.com	Dorsey & Whitney LLP	50 South 6th Street Suite 1500 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_14-661_M-14-661
Eric	Swanson	eswanson@winthrop.com	Winthrop Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_14-661_M-14-661
Gregory	Walters	gjwalters@minnesotaenergyresources.com	Minnesota Energy Resources Corporation	3460 Technology Dr. NW Rochester, MN 55901	Electronic Service	No	OFF_SL_14-661_M-14-661
James P.	Zakoura	Jim@smizak-law.com	Smithyman & Zakoura Chartered	750 Commerce Plaza II 7400 West 110th Street Overland Park, KS 662102362	Electronic Service	No	OFF_SL_14-661_M-14-661