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August 5, 2019

VIA ELECTRONIC FILING

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

Re: In the Matter of the Annual Service Quality Report for Minnesota Energy Resources Corporation for 2018, Docket No. G011/M-19-303

Reply Comments of Minnesota Energy Resources Corporation

Dear Mr. Wolf:

On June 17, 2019, the Minnesota Office of the Attorney General, Residential Utilities and Antitrust Division (the "OAG") filed Comments on all of the natural gas utilities' 2018 annual gas service quality reports recommending that the Commission require all of the utilities to report on the same nine metrics and 25 submetrics related to integrity management as agreed to by CenterPoint Energy as a condition for approval of a contract between CenterPoint and a construction company that was to become CenterPoint's affiliate through a merger.

On July 16, 2018, the Minnesota Department of Commerce, Division of Energy Resources (the "Department") filed Comments in the above-referenced docket recommending that the Minnesota Public Utilities Commission ("Commission") accept Minnesota Energy Resources Corporation's ("MERC's" or the "Company's") 2018 Annual Service Quality Report pending MERC providing a corrected Attachment 2 with Reply Comments, that includes the number of meters, both with and without farm taps, that have not been read for 6-12 months and greater than 12 months. The Department further recommended that the Commission allow MERC to retain the \$500,000 set aside as an Improved Customer Experience ("ICE") project performance incentive but deny MERC's request to discontinue monitoring and reporting on ICE project performance metrics and associated \$500,000 annual performance incentive set-aside. Finally, the Department recommended that the Commission continue to require the Company to report the information set forth in Order Point 3 of the Commission's April 12, 2019, Order in Docket No. G011/M-18-317, with amendments.

MERC submits these Reply Comments in response to the OAG and the Department's recommendations, the Department's request for additional information, and in

accordance with the Commission's July 29, 2019, Notice of Extended Reply Comment Period.

1. *Meter Reading*

With respect to meter reading, the Department requests that MERC provide a corrected Attachment 2 that includes the number of meters, both with and without farm taps, that have not been read for 6-12 months and greater than 12 months. In particular, the Department notes that in Attachment 2, the categories for meters not read in 6-12 months and greater than 12 months, for both farm tap and non-farm tap meters, the values seem to be missing.¹

Upon further investigation, MERC determined that its report of meter reading data was coded incorrectly, affecting the reporting data submitted in Attachment 2 to MERC's May 1, 2019 filing. MERC has now corrected these coding issues and is submitting a corrected meter reading report as Attachment A to these Reply Comments. As shown in Attachment A, MERC's corrected meter reading data for meters not read in 6 to 12 months and over 12 months for non-farm tap and all customers is in line with prior years.

2. *ICE Performance Metrics*

With respect to MERC's reporting on performance related to ICE and whether MERC has demonstrated that the benchmarks have been met for the Company to retain the \$500,000 set aside in accordance with the Commission's October 31, 2016, Findings of Fact, Conclusions, and Order in Docket No. G011/GR-15-736, the Department concluded:

MERC achieved its stated goal in each of the following categories – Customer Transaction Satisfaction, Residential First Call Resolution, Even Payment Plan Adoption, Electronic Bill Adoption, Electronic Payment option, and Field Service Appointments Kept. Given the achievements in these metric categories, and the non-ICE factors that likely impacted the performance in the three other metrics, the Department recommends that the Commission allow MERC to retain the \$500,000 set aside as a 2018 performance incentive.²

MERC thanks the Department for its detailed review of the Company's 2018 Gas Service Quality Report and ICE performance metrics and agrees with the Department's recommendation regarding 2018 ICE performance.

¹ Department Comments at 5.

² Department Comments at 19.

Additionally, in the Company's 2018 filing, MERC requested approval to discontinue annual reporting on the ICE performance metrics in accordance with the Commission's October 31, 2016 Findings of Fact, Conclusions, and Order in Docket No. G011/GR-15-736.³ As stated in MERC's filing, because MERC's 2017 and 2018 ICE performance metrics indicate that the ICE Project has achieved its stated objectives in improving customer service, MERC requests that the Commission determine that ongoing monitoring and reporting is no longer necessary, and that the \$500,000 no longer needs to be set aside as a performance incentive. Further significant improvements stemming directly from the ICE Project in the identified performance measures are not anticipated, although incremental improvements in a number of areas are likely to continue. MERC believes it has demonstrated improvements with respect to the identified ICE Performance Indicators and has fully explained areas where factors outside of the ICE Project have and will continue to impact overall performance.

In its Comments, the Department recommends that the Commission not allow MERC to discontinue ICE performance reporting at this time.⁴ The Department notes that improvements due to ICE may not be reflected in a particular year's metric results such that the level of improvement can only be evaluated over a longer period of time. The Department notes that it may be reasonable to discontinue reporting on these metrics once MERC's advanced metering infrastructure ("AMI") project is implemented since it will be difficult to assess the extent to which the metrics are impacted by AMI and the extent they are impacted by ICE.

For the reasons set forth in the Company's May 1, 2019, filing and discussed above, MERC continues to believe discontinuance of reporting on the ICE performance metrics is reasonable and appropriate at this time. MERC believes it has demonstrated improvements with respect to the identified ICE performance indicators, consistent with the Commission's October 31, 2016 Findings of Fact, Conclusions, and Order in Docket No. G011/GR-15-736.

3. Integrity Management Performance Measures and Future Reporting

In the Commission's April 12, 2019, Order Accepting Reporting, Requiring Compliance Filing, and Setting Additional Reporting Requirements issued in Docket No. G011/M-18-317, the Commission required MERC to file, in its 2018 Gas Service Quality Report:

³ The Commission's Order provides that the Company may modify these benchmarks and shall report annually unless the Commission determines ongoing monitoring is no longer necessary and the \$500,000 no longer needs to be set aside as a performance incentive. Order at 55 (Order Point 11.b).

⁴ Department Comments at 20.

- a. The utility's filing under 49 C.F.R. 192.1007(e): integrity management plan performance measures; monitoring results; and evaluation of effectiveness in a manner to establish a baseline for ongoing reporting.
- b. A summary of any 2018 emergency response violations cited by the Minnesota Office of Pipeline Safety ("MNOPS") along with a description of the violation and remediation in each circumstance.
- c. The number of violation letters received by the utility from MNOPS during the year in question.
- d. A discussion of how to provide ongoing monitoring and metrics towards the deployment of Excess Flow Valves ("EFVs") and manual service line shutoff valves pursuant to the Commission's order in Docket No. G999/CI-18-41.

In its Comments, the Department concludes that MERC complied with the Commission's Order with respect to the additional reporting. Additionally, the Department recommends continuation of this reporting but notes that continued reporting in annual gas service quality filings regarding EFV installation may not be necessary since the Commission separately ordered annual compliance reports in Docket No. G999/CI-18-41.⁵ The Department thus recommends that the Commission continue to require MERC to report the information outlined in order point 3 of the Commission's April 12, 2019, Order, with the following amendments:

- a. Based on tThe utility's filing under 49 C.F.R. 192.1007(e) and the baseline information provided on May 1, 2019, an update of: integrity management plan performance measures; monitoring results; and evaluation of effectiveness ~~in a manner to establish a baseline for ongoing reporting.~~
- b. A summary of any [2019] emergency response violations cited by the Minnesota Office of Pipeline Safety ("MNOPS") along with a description of the violation and remediation in each circumstance.
- c. The number of violation letters received by the utility from MNOPS during the year in question.
- d. ~~A discussion of how to provide ongoing monitoring and metrics towards the deployment of Excess Flow Valves ("EFVs") and manual service line shutoff valves pursuant to the Commission's order in Docket No. G999/CI-18-41.~~⁶

MERC agrees with the Department's recommendations regarding future reporting on integrity management performance, emergency response violations, violation letters, and addressing continued reporting with respect to EFVs and emergency service line shutoff valves in Docket No. G999/CI-18-41.

As reflected in MERC's May 1, 2019, Gas Service Quality Report filing, MERC provided extensive data regarding its integrity management performance metrics. Under Title 49

⁵ Department Comments at 22.

⁶ Department Comments at 23.

C.F.R. § 192.1007(e), operators are required to develop and monitor performance measures from an established baseline to evaluate the effectiveness of integrity management programs, including the following: (1) number of leaks either eliminated or repaired, identified by cause and material; (2) number of excavation damages; (3) number of excavation tickets; and (4) additional measures the operator determines are needed to evaluate the effectiveness of the operator's integrity management plan. The specific performance metrics are operator specific and the results of these performance measures are considered in MERC's ongoing evaluation of threats and risks to its distribution system.

As reflected in Attachment 12 to the Company's 2018 Gas Service Quality report, in addition to tracking data regarding hazardous leaks and other leaks eliminated or repaired by cause and material and number of excavation damages and excavation tickets, MERC has identified additional measures to evaluate the effectiveness of its integrity management plan as a result of risk evaluation and analysis. Those measures include external corrosion on all steel, atmospheric corrosion on meter sets, emergency response times, and percentage of leaks eliminated or repaired within one year.

For each performance measure, the established baseline was identified and described in Attachment 12. The baseline for each measure is based on available data. For example, MERC has developed a ten-year baseline for leaks (2006-2015) and a five-year baseline with respect to excavation damages, excavation tickets, and the ratio of damages to excavation tickets. Attachment 12 also describes the effectiveness criteria for each performance measure, relative to the baseline, and provides data regarding 2018 results relative to the established baseline. The purpose of the performance metrics under 49 C.F.R. § 192.1007(e) is to allow gas system operators to evaluate the effectiveness of their integrity management programs relative to an established baseline in order to determine progress and identify the need for any accelerated action.

In its Comments, the OAG proposes additional requirements for gas utility reporting with respect to integrity management performance, so that all gas utilities are required to report consistent with CenterPoint Energy rather than in accordance with their own Pipeline and Hazardous Materials Safety Administration ("PHMSA") distribution integrity management performance metrics and plans.

As discussed in the OAG's June 17, 2019, Comments, CenterPoint Energy, as part of its approval of a contract between the utility and a construction company that was to become CenterPoint's affiliate through the merger of the two parties' parent companies, committed to provide information on nine metrics and 25 submetrics related to integrity management programs and investments. The OAG recommends that all gas utilities report on those same metrics and variants, consistent with CenterPoint's commitment stemming from its affiliated interest approval:

Metric	Variants
1. Leak Count by Facility Type and Threat	a. Total Count by Cause – Above Ground b. Total Count by Cause – Mains c. Total Count by Cause – Services
2. Leak Count on Main by Material	N/A
3. Leak Count on Service by Material	N/A
4. Risk by Facility Type and Threat	a. Total Risk by Cause – Above Ground b. Total Risk by Cause – Mains c. Total Risk by Cause – Services
5. Risk on Main by Material	N/A
6. Risk on Service by Material	N/A
7. Unit Cost Installed by Project (\$ per foot replaced unless otherwise noted)	a. TIMP Transmission Pipeline Integrity b. TIMP Transmission Pipeline Replacement c. TIMP Remote Control Valves (per 12-inch valve installed) d. DIMP Bare Steel Mains e. DIMP Cast Iron Mains f. DIMP Copper Service Lines (per service line replaced) g. DIMP Inside Meters (per meter moved) h. DIMP Legacy Plastic Pipe (per service line replaced)
8. Comparison of Budgeted Costs to Actual Installed Costs	a. TIMP Transmission Pipeline Integrity b. TIMP Transmission Pipeline Replacement c. TIMP Remote Control Valves d. DIMP Bare Steel Mains e. DIMP Cast Iron Mains f. DIMP Copper Service Lines g. DIMP Inside Meters h. DIMP Legacy Plastic Pipe
9. Average Annual Cost to Repair Leaks by Facility	a. Leaks on Mains b. Leaks on Services c. Leaks on Meters

Many of these proposed reporting metrics were already provided with MERC's 2018 Gas Service Quality Report and will be provided with future reporting, consistent with

the Department's recommendations, as discussed above. Additionally, because distribution integrity management performance metrics are utility-specific, MERC's performance metrics, as included in Attachment 12 to the Company's 2018 Gas Service Quality Report, are also more expansive than what is referenced in the OAG's comments. For example, MERC provided baseline data, averages, and 2018 data on external corrosion related to all steel, bare steel, and coated steel. MERC also provided more extensive historic data for many of its metrics. Because distribution integrity management is extremely utility-specific, and because MERC is already providing extensive data specific to MERC's operations and investments, the OAG's proposal to require uniform reporting by all of the natural gas utilities should be rejected. The OAG's proposed uniform reporting is not reasonable or necessary to allow the Commission, the OAG, and other interested stakeholders to understand and track gas utility integrity management performance.

First, distribution integrity management and transmission integrity management programs are not one-size-fits-all but rather are utility-specific. The OAG's stated goal of "standardizing the filing requirements for gas service-quality reports . . . [to] streamline the review of these reports," is counter to the purpose and goal of federal distribution integrity management and transmission integrity management regulations, which require natural gas system operators to know their systems. The information MERC provided in accordance with the Commission's April 12, 2019, Order pursuant to PHMSA regulations is MERC-specific distribution integrity management data. The specific risks as well as any quantification of those risks, is unique to each natural gas utility system operator.

Second, MERC has already agreed to continue providing distribution integrity management performance metric data consistent with the Commission's previous Order and the Department's recommendations in this docket. Further, the Company has and will be providing significant data and information regarding its investments in distribution integrity management capital improvements and survey work as part of its Gas Utility Infrastructure Cost ("GUIC") rider true-up process that was approved in Docket No. G011/M-18-281.⁷ The extensive information already being provided by MERC will allow the Commission, the OAG, and other interested stakeholders to fully evaluate MERC's investments in distribution integrity management to ensure such investments are reasonable and prudent.

Third, the recommended reporting would not further the OAG's stated goal of ensuring the investments in DIMP and TIMP are accomplishing their intended purpose of

⁷ *In the Matter of Minnesota Energy Resources Corporation's Request for Approval of a Gas Utility Infrastructure Cost Rider*, Docket No. G011/M-18-281, Order Approving Gas Utility Infrastructure Cost Rider with Modifications and Requiring Compliance Filing at 9 (Feb. 5, 2019) (declining to adopt performance metrics and stating that "the annual rider true-up process will provide the Commission, the OAG, and other stakeholders an additional opportunity to ensure that GUIC investments are prudent and cost-effective").

reducing risk at reasonable costs. Often the Company does not know the material or condition of pipe until it is exposed as part of other work. Similarly, where known main replacement is required as a result of obsolete materials, the number of affected services may not be known until the project begins. Additionally, unit costs for each project vary for a number of reasons including soil conditions, paving requirements, permit requirements, and others. Further, as discussed in May 1 Gas Service Quality filing, while the PHMSA distribution integrity management performance metrics guide MERC's ongoing evaluation of system integrity and risk, a deeper evaluation of the underlying data is necessary and important to understanding trends in increasing or diminishing effectiveness.

MERC's integrity management risk analysis is an ongoing process of understanding what factors affect the risk posed by threats to the gas distribution system and where they are relatively more important than others. The primary objectives in the evaluation and ranking of gas distribution system risks are to:

- Consider each applicable current and potential threat;
- Consider the likelihood of failure (frequency) associated with each threat;
- Consider the potential consequences of such a failure;
- Estimate and rank the risks posed to the distribution system; and
- Consider the relevance of threats in one location to other areas.

MERC's integrity management risk analysis incorporates factors beyond the data provided in Attachment 12 (i.e., leaks and excavation damages) including consequence, risk and consequence probability, and frequency (e.g., the relative percentage of leaks by cause to the total number of leaks for the system). And while the identified effectiveness criteria provide a trigger for further investigation, a deeper analysis of the data is necessary to properly and fully evaluate risk and identify any appropriate actions to mitigate or address risks. Consequently, the Company is constantly reviewing risk and effectiveness and reprioritizing based on current data. Notably, as construction related to right-of-way relocation work, reliability, and integrity management has increased in recent years so too has the available data and visibility into risks on MERC's system. For example, external corrosion that would not have been detected during a leak survey frequently is identified during construction projects necessitating the excavation of a portion of the distribution system.

Finally, the data that is tracked and relied upon by CenterPoint for its distribution and transmission integrity management reporting and risk ranking is unique to CenterPoint – it is not necessarily the same data that is tracked by and available to MERC. As a result, reporting on the same specific categories as conceded to by CenterPoint in securing approval for a merger agreement would require the deployment of significant system upgrades and modifications, additional staffing, and other resources. Such modifications would not be instantaneous but would require time to complete. MERC believes that resources are better spent reducing known system risks.

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Finally, MERC notes that the OAG's assertion that "CenterPoint was the only utility that provided historical averages against which to compare the current year's performance," is incorrect. MERC not only provided historic averages for each performance metric, but provided more extensive historic data for many of its metrics. As reflected in MERC's Attachment 12 and described in the Company's May 1 report, the baseline for each measure is based on available historical averages. For example, MERC has developed a ten-year baseline for leaks (2006-2015) and a five-year baseline with respect to excavation damages, excavation tickets, and the ratio of damages to excavation tickets. Attachment 12 also describes the effectiveness criteria for each performance measure, relative to the baseline, and provides data regarding 2018 results relative to the established baseline.

In conclusion, MERC respectfully requests that the Commission (1) accept the Company's 2018 Gas Service Quality Report; (2) find that MERC has met the requirements to retain the \$500,000 set aside as an ICE performance incentive; (3) allow MERC to discontinue reporting on its ICE performance metrics going forward, (4) approve the Department's recommendations for continued reporting on distribution integrity management performance metrics, MNOPS emergency response violations, and MNOPS violation letters; and (5) reject the OAG's recommendation to require all natural gas utilities to report on the nine metrics and 25 variants agreed to by CenterPoint.

Please contact me at (414) 221-2374 if you have any questions regarding the information in this filing. Thank you for your attention to this matter.

Sincerely,



Mary L. Wolter
Director – Gas Regulatory Planning & Policy

Enclosure
cc: Service List

Meter Reading Performance

	Total Meter Reads	# company read	% company read	# self-read	% of self-read	# not read in 6-12 months	% not read in 6-12 months	# not read > 12 months	% not read > 12 months	Comments
without farm taps										
January	239,743	239,624	99.95%	113	0.05%	1	0.0004%	0	0.0000%	accessibility and dogs
February	227,677	227,560	99.95%	113	0.05%	0	0.0000%	0	0.0000%	
March	239,958	239,837	99.95%	119	0.05%	0	0.0000%	0	0.0000%	
April	238,725	238,596	99.95%	122	0.05%	2	0.0008%	0	0.0000%	accessibility and dogs
May	239,907	239,796	99.95%	104	0.04%	1	0.0004%	0	0.0000%	accessibility and dogs
June	238,903	238,776	99.95%	99	0.04%	1	0.0004%	0	0.0000%	accessibility and dogs
July	241,617	241,513	99.96%	91	0.04%	0	0.0000%	0	0.0000%	
August	242,693	242,591	99.96%	91	0.04%	0	0.0000%	0	0.0000%	
September	219,283	219,169	99.95%	100	0.05%	4	0.0018%	0	0.0000%	accessibility and dogs
October	244,692	244,589	99.96%	98	0.04%	6	0.0025%	0	0.0000%	accessibility and dogs
November	223,702	223,597	99.95%	104	0.05%	2	0.0009%	0	0.0000%	accessibility and dogs
December	228,616	228,510	99.95%	104	0.05%	5	0.0022%	0	0.0000%	accessibility and dogs

with farm taps										
January	241,567	240,649	99.62%	912	0.38%	281	0.1163%	1	0.0004%	farm taps, weather, accessibility, and dogs
February	229,445	228,576	99.62%	865	0.38%	279	0.1216%	0	0.0000%	farm taps, weather, accessibility, and dogs
March	241,753	240,801	99.61%	950	0.39%	284	0.1175%	0	0.0000%	farm taps, weather, accessibility, and dogs
April	240,602	239,716	99.63%	879	0.37%	225	0.0935%	8	0.0033%	farm taps, weather, accessibility, and dogs
May	242,378	241,545	99.66%	826	0.34%	135	0.0557%	1	0.0004%	farm taps, weather, accessibility, and dogs
June	241,128	240,393	99.70%	706	0.29%	43	0.0178%	1	0.0004%	farm taps, weather, accessibility, and dogs
July	243,393	242,617	99.68%	763	0.31%	40	0.0164%	2	0.0008%	farm taps, weather, accessibility, and dogs
August	244,477	243,718	99.69%	748	0.31%	38	0.0155%	0	0.0000%	farm taps, weather, accessibility, and dogs
September	221,010	220,227	99.65%	769	0.35%	43	0.0195%	0	0.0000%	farm taps, weather, accessibility, and dogs
October	246,544	245,695	99.66%	844	0.34%	78	0.0316%	2	0.0008%	farm taps, weather, accessibility, and dogs
November	225,341	224,737	99.73%	603	0.27%	243	0.1078%	1	0.0004%	farm taps, weather, accessibility, and dogs
December	230,534	229,787	99.68%	745	0.32%	367	0.1592%	0	0.0000%	farm taps, weather, accessibility, and dogs

In the Matter of the Annual Service
Quality Report for Minnesota Energy
Resources Corporation for 2018

Docket No. G011/M-19-303

CERTIFICATE OF SERVICE

I, Kristin M. Stastny, hereby certify that on the 5th day of August, 2019, 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. Said documents were also served via U.S. mail and electronic service as designated on the attached service list.

Dated this 5th day of August, 2019.

/s/ Kristin M. Stastny
Kristin M. Stastny

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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_19-303_M-19-303
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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_19-303_M-19-303
Mary	Wolter	mary.wolter@wecenergygroup.com	Minnesota Energy Resources Corporation (HOLDING)	231 West Michigan St Milwaukee, WI 53203	Electronic Service	No	OFF_SL_19-303_M-19-303