



85 7TH PLACE EAST, SUITE 280
SAINT PAUL, MINNESOTA 55101-2198
MN.GOV/COMMERCE
651.539.1600 FAX: 651.539.1574
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April 14, 2017

Daniel P. Wolf
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, Minnesota 55101

RE: **Comments of the Minnesota Department of Commerce, Division of Energy Resources**
Docket Nos. G011/M-17-210, G011/M-17-211, and G011/M-17-212

Dear Mr. Wolf:

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

Petition of Minnesota Energy Resources Corporation (MERC) for Approval of a Tariff Revision and Additional New Area Surcharge Customer Classes for the Ely Lake Project (Docket No. G011/M-17-211), Detroit Lakes-Long Lake Project (Docket No. G011/M-17-210), and Fayal Township Long Lake Project (Docket No. G011/M-17-212).

The *Petitions* were filed on March 15, 2017 by:

Amber S. Lee
Regulatory and Legislative Affairs Manager
Minnesota Energy Resources Corporation
1995 Rahncliff Court, Suite 200
Eagan, Minnesota 55122

As discussed in detail in the attached *Comments*, the Department recommends approval of MERC's proposed tariff revisions to establish New Area Surcharges for the Large C&I customer class for the Ely Lake and Detroit Lakes New Area Surcharges, and denial of MERC's request to establish New Area Surcharges for any other additional customer classes. The Department is available to answer any questions that the Minnesota Public Utilities Commission may have in this matter.

Sincerely,

/s/ MICHAEL RYAN
Rates Analyst

/s/ LAURA OTIS
Rates Analyst

/s/ MICHAEL N. ZAJICEK
Rates Analyst

MR/LO/MZ/lt
Attachment

BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

**COMMENTS OF THE
MINNESOTA DEPARTMENT OF COMMERCE**

DOCKET Nos. G011/M-17-210, G011/M-17-211, and G011/M-17-212

I. BACKGROUND

On June 20, 2014, Minnesota Energy Resources Corporation (MERC or the Company) submitted a filing to the Minnesota Public Utilities Commission (Commission) in Docket No. G011/M-14-524 to:

- Modify the Company's New Area Surcharge tariff sheet to allow a New Area Surcharge to remain in effect for a term not to exceed thirty (30) years; and
- Establish a New Area Surcharge for customers located near Ely Lake in the Cities of Eveleth and Gilbert in northern Minnesota.

On September 5, 2014, the Commission approved the Company's request, stating, in part:

In light of the Company's representations in its filing and at the hearing, the Commission will for the present authorize the Company to apply the surcharge rate of \$33.50 to residential and existing small commercial customers, noting that at present it does not expect customers from other customer class to request service. In the event any other small commercial customers or customers from other customer classes seek to take natural gas service in the Ely Lake project area, the Company must first refile its request with Commission to examine the full impact of the addition of such customer(s) so as to determine the appropriate surcharge level for all customer classes. [Footnote omitted.]

On July 28, 2015, the Commission approved the Company's request for approval of a New Area Surcharge (NAS) for the Detroit Lakes-Long Lake Project in Docket No. G011/M-15-441. The Commission approved a surcharge rate of \$19.16 for residential customers and \$36.30 for small commercial/interruptible customers. The July 28, 2015 Order stated:

Since the Company does not expect to receive new-service applications from customers outside the residential and small commercial/industrial classes, the Company should submit new-area-surcharge tariffs for only those classes. If and when large commercial or large industrial customers seek service, the Company should file proposed tariffs for those customer classes, with documentation showing estimated costs and revenues, as well as the application of the new-area-surcharge model to those customer classes.

On August 25, 2015, MERC filed a petition (Docket No. G011/M-15-776) requesting approval to reduce the previously approved Ely Lake NAS from \$33.50 to \$25.45 due to corrections made to incorporate the Company's 75-foot service extension allowance and to exclude the Conservation Cost Recovery Charge from the marginal distribution revenue stream calculation in the NAS model.¹ The Commission approved the Company's request in its October 16, 2016 Order.

On June 10, 2016, the Commission approved MERC's request for approval of the Fayal Township Long Lake NAS.² Along with the approval of the Fayal Township Long Lake NAS, the Commission approved annual reporting requirements on March 1 of each year. In relevant part, the Commission's Order states:

The Commission finds the Company's proposed Fayal Township Long Lake project surcharges of \$21.16 for Residential customers and \$40.09 for Small C&I customers to be collected over a period of 20 years are reasonable and will approve them. MERC proposed that New Area Surcharge factors be set for four customer classes – Residential, Small Commercial & Industrial (C&I), Large C&I, and Small Volume Interruptible. MERC stated that its anticipated customer base at present will be only Residential.

The Commission will approve the New Area Surcharge factors for the Small C&I customers, as well as the Residential class as properly calculated. At hearing, the Company stated that adding a large customer class could affect the accounting for the proposed extension. Accordingly, the Commission will not set tariff factors for MERC's large customer classes at this time.

¹ These modifications to the model were made to be consistent with the Commission's Order in Docket No. G011/M-15-441 (Detroit Lakes-Long Lake NAS).

² Docket No. G011/M-16-221.

II. SUMMARY OF THE PETITIONS

Pursuant to Minn. R. 7829.1300 and in conformity with the Commission’s Orders in the Ely Lake, Detroit Lakes-Long Lake, and Fayal Township Long Lake NAS dockets, MERC is requesting approval to add surcharges for the Large Commercial and Industrial (C&I), Small Volume Interruptible (SVI), and Large Volume Interruptible (LVI) customer classes. The Company indicated that the request is being made in order to allow new customers in these classes to participate in the project and receive natural gas service. Table 1 below lists the specific details for each MERC NAS project.

Table 1: MERC NAS Project Details

Project	Initial NAS Petition Docket No.	NAS Order Date	NAS Petition Docket No. to Add Customer Classes
Ely Lake	G011/M-14-524	September 5, 2014	G011/M-17-211
Detroit Lakes	G011/M-15-441	July 28, 2015	G011/M-17-210
Fayal Township	G011/M-16-221	June 10, 2016	G011/M-17-212

As noted above, NAS factors for the three extension projects have been approved for only two rate classes—Residential and Small C&I. MERC indicated that since the Ely Lake NAS project was initially approved in 2014, one Large C&I customer has requested to receive natural gas service in the project area, and one Large C&I customer in the Detroit Lakes project area has requested natural gas service. As of the date of MERC’s petitions in the instant dockets, no SVI or LVI customer has requested service in either the Ely Lake or Detroit Lakes project areas. Similarly, all customers requesting service in Fayal Township are Residential and Small C&I customers. Below in Table 2 is a list of the NAS customer classes that have already been approved compared to classes that the Company is seeking approval.

Table 2: NAS Customer Class Summary

NAS Customer Class	Ely Lake	Detroit Lakes	Fayal Township
Residential	Already Approved	Already Approved	Already Approved
Small C&I	Already Approved	Already Approved	Already Approved
Large C&I	Seeking Approval (one customer has requested service)	Seeking Approval (one customer has requested service)	Seeking Approval (no customer has requested service)
SVI	Seeking Approval (no customer has requested service)	Seeking Approval (no customer has requested service)	Seeking Approval (no customer has requested service)
LVI	Seeking Approval (no customer has requested service)	Seeking Approval (no customer has requested service)	Seeking Approval (no customer has requested service)

MERC stated that it is not proposing to modify the previously approved NAS for the Residential and Small C&I customer classes. Rather, the Company stated that those classes would benefit from Large C&I, SVI, or LVI customers joining the system because the

total project costs would be paid off more quickly, resulting in a shorter NAS term for all customers in the NAS areas.

MERC included an updated tariff sheet, the work papers the Company used to calculate the surcharges, and a proposed customer notice for each project area.

Table 3 below shows the Company’s approved and proposed NAS factors.

Table 3: MERC’s Approved and Proposed NAS Factors

NAS Customer Class	Ely Lake 20-Year NAS		Detroit Lakes 15-Year NAS		Fayal Township 20-Year NAS	
	Approved	Proposed	Approved	Proposed	Approved	Proposed
Residential	\$25.45	\$25.45	\$19.16	\$19.16	\$21.16	\$21.16
Small C&I	\$25.45	\$25.45	\$36.30	\$36.30	\$40.09	\$40.09
Large C&I	N/A	\$120.55	N/A	\$90.76	N/A	\$100.23
SVI	N/A	\$442.03	N/A	\$332.78	N/A	\$367.49
LVI	N/A	\$495.61	N/A	\$373.12	N/A	\$412.04

III. DEPARTMENT ANALYSIS

The NAS rider is governed by Minnesota Rules Part 7829.1300—Miscellaneous Tariff and Price List Filings, the Commission’s July 26, 2012 Order in Docket No. G007,011/M-11-1045, and the NAS pages in the Company tariff book. As noted above, each of the three projects included has already been approved for NAS recovery. MERC is requesting approval to add surcharges for customer classes not included in the initial approval.

Minnesota Rules Part 7829.1300 lays out filing content and service requirements for miscellaneous tariff filings, such as NAS petitions. The Department has reviewed the requirements under Minnesota Rules Part 7829.1300 and concludes that the Company complied with all requirements.

The Commission’s July 26, 2012 Order in Docket No. G007,011/M-11-1045 requires that any filing for a miscellaneous rate change for a specific NAS project shall include at a minimum:

- an updated surcharge tariff sheet and its related spreadsheets with and without the proposed surcharge for each new surcharge area;
- its work papers showing all underlying assumptions concerning interest rates, costs, depreciation, demographics, rate structure, etc.
- a surcharge rate for each customer class, even if no customers are anticipated for the class;
- the Company's proposed customer notice; and
- all pertinent contract demand entitlement change requests as soon as the required information is ascertained.

In the instant petitions, MERC provided updated tariff sheets in the Company's Attachment 1, its workpapers in Attachment 3, proposed surcharge rates for each class in the body of the Petition, and a proposed customer notice in Attachment 2. The filings did not include discussion on demand entitlements. For the sake of completeness, the Department followed up informally with MERC and confirmed that the Company expects no change to contract demand entitlements.

The Department also followed up informally with the Company to discuss the Company's work papers provided and the alternative calculations of NAS for each class in the Ely Lake and Detroit Lakes projects. MERC acknowledged that the calculations provided represent hypothetical scenarios for the projects assuming additional customers of various classes were added. MERC indicated that it does not expect all of the customers included in the calculations to join the system and that these hypothetical potential customers may not exist. The Department, however, determined that the methodology and data necessary to confirm the Company's calculations of its proposed NAS factors were contained within the workpapers. The calculations for the Fayal Township project assumed the same customer count by class as was proposed in Docket No. G011/M-16-221.

Below, the Department discusses the following topics:

- establishing additional NAS factors for customer classes associated with anticipated customers,
- maintaining the currently approved Ely Lake NAS factor for Small C&I customers for future Small C&I customers,
- establishing additional NAS factors for customer classes not anticipated to request service; and
- maintaining the previously approved NAS factors for Residential and Small C&I customer classes.

A. *ESTABLISHING ADDITIONAL NAS FACTORS FOR CUSTOMER CLASSES ASSOCIATED WITH ANTICIPATED CUSTOMERS*

In both the Ely Lake³ and Detroit Lakes⁴ projects, MERC stated that one Large C&I customer has requested to receive natural gas in the project area. The Company's proposed Large C&I, SVI and LVI surcharges are based on those customer class' proportional customer charge in relation to the residential customer charge.

The method of calculating the NAS for more than one customer class has evolved as more projects have been proposed and approved. The Fayal Township project record included a comparison of two methods, one based on annual volumetric usage, and the second based on proportional customer charge differences. In the Fayal Township proceeding, both the Company and the Department concluded that the customer charge allocation method resulted in surcharges that were more reasonable across all customer classes.⁵ The

³ Docket No. G011/M-14-524 and G011/M-17-211.

⁴ Docket No. G011/M-15-441 and G011/M-17-210.

⁵ Docket No. G011/M-16-221, April 27, 2016 Response Comments by the Department, page 2.

customer charge allocation methodology was most recently used in the Balaton and Esko projects to calculate the surcharges for non-residential NAS factors.⁶

In the original Detroit Lakes NAS docket, the Company used the customer charge allocation methodology to calculate the Residential and Small Commercial surcharges, but then proposed to use the Small Commercial surcharge amount for all other, non-residential rate classes. The Commission required the Company to implement the proposed Detroit Lakes NAS factors for the Residential and Small Commercial classes only, denying MERC's request to add surcharge rates for the other customer classes. As noted above, the Company did not expect to add customers in those classes at that time.⁷ In the current petitions, MERC has proposed Large C&I, LVI, and SVI surcharge rates that are in proportion with existing customer charges, though MERC anticipates adding a customer in only the Large C&I class at this time.

The Department concludes that basing the new NAS factors on the currently approved Residential NAS but in proportion to the customer class' varying customer charges is reasonable, as more fully discussed in Docket No. G011/M-16-221. Therefore, the Department recommends that the Commission approve the monthly Large C&I rates of \$120.55 and \$90.76 for Ely Lake and Detroit Lakes, respectively. However, the Department recommends that the Commission deny MERC's request to establish NAS factors for the SVI and LVI customer classes at this time, consistent with the Commission's Orders and as more fully discussed below.

B. MAINTAINING EXISTING ELY LAKE SMALL C&I NAS FACTOR FOR FUTURE SMALL C&I CUSTOMERS

For the Ely Lake project MERC proposed to maintain the Small C&I NAS rate and extend it to future Small C&I customers. The currently approved Small C&I NAS rate was set equal to the Residential NAS rate (Docket No. G-011/M-14-524). This rate was then adjusted for Commission-approved corrections in Docket No. G-011/M-15-776. The Commission's September 5, 2014 *Order Approving New Area Surcharge and Proposed Tariff Modification* (September 5 Order), however, stated in Order Point 2:

... Should additional potential customers from the small business class or other customer classes seek to take service under the surcharge, the Company shall return to the Commission to determine the appropriate surcharge.

⁶ Docket No. G011/M-16-654 and G011/M-16-655.

⁷ July 28, 2015 Order in Docket No. G-011/M-15-441

The Commission also stated that:

In the event any other small commercial customers or customers from other customer classes seek to take natural gas service in the Ely Lake project area, the Company must first refile its request with Commission to examine the full impact of the addition of such customer(s) so as to determine the appropriate surcharge level for all customer classes.

The Commission's *September 5 Order* indicates that the Company should recalculate its Small C&I NAS rate should additional Small C&I customers or customer from additional customer classes seek service in order to enable the Commission to gauge the impact of the additional customer(s). Recalculating the Small C&I NAS using the Company's methodology results in a Small C&I NAS monthly rate of \$48.22. The recalculated NAS rate is 89 percent higher than the currently approved monthly rate of \$25.45.

The Department recognizes, however, that a substantial increase in the Small C&I NAS rate for customers that are already being charged at the lower rate may not be reasonable, as the customers may have based their decision to take service from MERC on the lower rate. Also, the Department agrees with MERC's assessment that any customers added that were not anticipated when the NAS was established benefits the project group by potentially ending the surcharge early.

As previously noted, the Commission did not adopt the Small C&I NAS factor as calculated using MERC's methodology, and instead established a Small C&I NAS factor equal to the Residential factor.⁸ In this case, the addition of one customer in the Large C&I customer class does not appear to justify a reversal of the Commission's earlier decision. Thus, the Department recommends that the Commission approve MERC's proposal to maintain the existing Ely Lake Small C&I NAS rate of \$25.45.

C. ESTABLISHING ADDITIONAL NAS FACTORS FOR CUSTOMER CLASSES NOT ANTICIPATED TO REQUEST SERVICE

For all three projects, MERC requested that the Commission approve NAS factors for customer classes not anticipated to request service. As outlined in Table 3 below, the Commission Orders have taking the following stance on establishing NAS rates for customer classes that do not have anticipated customers:

⁸ At the time of the initial approval of the Ely Lake NAS, it was anticipated that there was only one Small C&I customer expected to take service. The consumption level of that customer was similar to that of a Residential customer.

Table 4: MERC NAS Orders Regarding Approval of Additional Customer Classes

Project	Initial NAS Petition No.	NAS Order Date	Order Comments on Rate Classes
Ely Lake	G011/M-14-524	September 5, 2014	Order Point No. 2 - "Should additional potential customers from the small business class or other customer classes seek to take service under the surcharge, the Company shall return to the Commission to determine the appropriate surcharge."
Detroit Lakes	G011/M-15-441	July 28,2015	"Since the Company does not expect to receive new-service applications from customers outside the residential and small commercial/industrial classes, the Company should submit new-area-surcharge tariffs for only those classes. If and when large commercial or large industrial customers seek service, the Company should file proposed tariffs for those customer classes, with documentation showing estimated costs and revenues, as well as the application of the new-area-surcharge model to those customer classes."
Fayal Township	G011/M-16-221	June 10, 2016	"The Commission will approve the New Area Surcharge factors for the Small C&I customers, as well as the Residential class as properly calculated. At hearing, the Company stated that adding a large customer class could affect the accounting for the proposed extension. Accordingly, the Commission will not set tariff factors for MERC's large customer classes at this time. The Commission authorizes the Company to publish the Residential and Small C&I factors in the New Area Surcharge tariff. In the event customers from the other MERC classes seek to take natural gas service in the Fayal Township Long Lake project area, the Commission will require MERC to first refile its request with the Commission to examine the full impact of the additional of such customer(s) so as to determine the appropriate surcharge level for all customer classes." Order Point No. 3 requires MERC to refile an NAS "factor proposal for any other customer class that develops in this area in the future."

As noted in Table 4 above, the Commission has required that the Company refile if new customers develop in the project area that were not anticipated during the initial proceeding. Although MERC's requests to establish NAS factors for customer classes still not anticipated to request service contradict the Commission's Orders, the Company asserted that its requests are in the public interest and based on their refined approach of basing the various customer class NAS rates on the class' proportional customer charge. In the Petition summaries, the Company argued that approval for all customer classes prior to the commencement of a project is essential because circumstances frequently change and new customer participation benefits all participants in an NAS project. MERC indicated the

following regarding surcharges for Large C&I, SVI, and LVI calculated based on relative class customer charge:⁹

While MERC recognizes that it previously stated that adding a large customer class could affect the accounting for the proposed extension, by using the above-explained customer charge allocation, approval of new customer classes does not, in fact, affect the calculation of the surcharge. In other words, adding a large customer class will not affect the accounting for the proposed extension with respect to the surcharges. Rather, adding the additional classes will allow additional customers to receive natural gas service and will lower the overall cost to other customers in the project area due to the likely resulting shorter NAS term, benefitting the existing Residential and Small C&I customers. MERC's proposed surcharges for the additional customer classes will ensure the Company's customers receiving service through the NAS are treated fairly and consistently and will allow for customer growth in the project area.

MERC acknowledges that in its past NAS petitions, the Commission has only approved NAS factors for those customer classes for which MERC projects customers. Here, however, while MERC is not projecting any customers taking service in the Large C&I, SVI, and LVI classes, the Company believes it prudent and resourceful to include surcharges in MERC's tariff in the event these customer classes require natural gas service in the Fayal Township Long Lake project area in the near future. In the event a Large C&I, SVI, or LVI customer requires service in the project area, all participants will benefit as the total project costs financed through the NAS are paid more quickly, resulting in the possibility of the NAS terminating before the end of the 20-year term. Accordingly, the Company respectfully requests that the Commission approve the proposed surcharges for the Large C&I, SVI, and LVI customer classes.

MERC's arguments, while well-reasoned, are nonetheless in direct contradiction with the Commission's Orders in Docket Nos. G011/M-15-441 and G011/M-16-221. In those Orders, the Commission clearly indicated that the NAS factors should be established based on realistic assumptions, and that if it turns out that the assumptions under-estimated actual customer interest, that the NAS factors should be re-examined. MERC's petitions were appropriately prompted by the addition of one Large C&I customer in the Ely Lake NAS and one Large C&I customer in the Detroit Lakes NAS; however, the impact of those customer additions supports establishing an NAS factor for the added customer class only. Consistent with the Commission's Orders, establishing NAS factors for the LVI and SVI

⁹ This argument is found in Docket E011/M-17-212, pages 3-4, but appears to be relevant to all 3 dockets.

customer classes would only be justified if a customer within those classes request service in those areas. Therefore, the Department recommends that the Commission deny MERC's request to establish NAS factors for the LVI and SVI customer classes for the Ely Lake and Detroit Lakes projects, and to deny MERC's request to establish NAS factors for the Large C&I, LVI and SVI customer classes for the Fayal Township project at this time.

D. MAINTAINING THE PREVIOUSLY APPROVED NAS FACTORS FOR RESIDENTIAL AND SMALL C&I

As stated by the Company, it is not proposing to modify the previously approved Residential and Small C&I customer surcharges. MERC cited its ability to minimize administrative burden and any customer confusion that could result from a modification of the previously approved NAS. The Department explored the potential of recalculating these rates, and ultimately concluded that it would be unnecessary.

The Department notes that MERC assumes the risk for under recovery of expansion costs if any remain at the end of the NAS period. In other words, if MERC over-estimated the number of customers expected to take service, it is possible that MERC may not recover all of the expansion costs. Also, MERC's tariff prevents over recovery of expansion costs because the NAS ends upon recovery of the project costs, or at the end of the NAS period, whichever occurs first. Because the risk of under-recovery lies with MERC, and there is no risk to customers of over-recovery, the addition of new customer classes does not necessitate the recalculation of the NAS. Unanticipated customer additions reduce costs for the NAS customers whether the NAS factors are reduced or whether they remain at current levels and the length of time the surcharge is imposed is shortened.

However, depending on degree and timing, should a significant and unanticipated number of customers, or size of customer, request service, it is appropriate for the Commission to consider adjusting the NAS factors, or shortening the NAS period, or both. The Commission's Orders ensure that the impact of unanticipated customer class additions is examined. As for unanticipated participation within the customer classes for which NAS rates have been established, the Department notes that information regarding the number of participating customers and a hypothetical recalculation of the NAS is included in the Company's regularly filed NAS compliance filings. The Department will continue to review the compliance filings to assess whether a significant change may warrant Commission review.

In this case, the addition of one customer in an unanticipated customer class in each of the Ely Lake and Detroit Lakes projects does not appear to reach a level of significance that would warrant a change in the currently established NAS rates. Therefore, the Department agrees with the Company that no modification should be made to the previously approved Residential and Small C&I NAS factors.

III. DEPARTMENT'S RECOMMENDATIONS

The Department concludes that the Company has met the requirements of Minnesota Rule, Commission Order, and MERC's NAS tariff for adding a new surcharge rate for the Large C&I customer class for the Ely Lake and Detroit Lakes New Area Surcharges. Therefore, the Department recommends that the Commission approve MERC's request to add monthly Large C&I NAS rates of \$120.55 and \$90.76 for the Ely Lake and Detroit Lakes-Long Lake expansion projects, respectively.

The Department recommends that the Commission deny MERC's request to establish a Large C&I NAS factor for the Fayal Township Long Lake expansion project.

The Department recommends that the Commission deny MERC's request to establish NAS factors for the Small Volume Interruptible and Large Volume Interruptible classes for the Ely Lake, Detroit Lakes-Long Lake, and Fayal Township Long Lake expansion projects.

Finally, the Department recommends that the Commission require MERC to file a compliance filing consistent with the Commission's decisions in the instant dockets within 10 days of the Commission's Order.

/lt

CERTIFICATE OF SERVICE

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

**Minnesota Department of Commerce
Comments**

Docket No. G011/M-17-210; G011/M-17-211; and G011/M-17-212

Dated this 14th day of April 2017

/s/Sharon Ferguson

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Michael	Ahern	ahern.michael@dorsey.com	Dorsey & Whitney, LLP	50 S 6th St Ste 1500 Minneapolis, MN 554021498	Electronic Service	No	OFF_SL_17-210_M-17-210
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_17-210_M-17-210
Seth	DeMerritt	ssdemerritt@integrysgroup.com	MERC (Holding)	700 North Adams P.O. Box 19001 Green Bay, WI 543079001	Electronic Service	No	OFF_SL_17-210_M-17-210
Emma	Fazio	emma.fazio@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_17-210_M-17-210
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 551012198	Electronic Service	No	OFF_SL_17-210_M-17-210
Daryll	Fuentes	dfuentes@usg.com	USG Corporation	550 W Adams St Chicago, IL 60661	Electronic Service	No	OFF_SL_17-210_M-17-210
Richard	Johnson	Rick.Johnson@lawmoss.com	Moss & Barnett	150 S. 5th Street Suite 1200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_17-210_M-17-210
Amber	Lee	ASLee@minnesotaenergyresources.com	Minnesota Energy Resources Corporation	2665 145th St W Rosemount, MN 55068	Electronic Service	No	OFF_SL_17-210_M-17-210
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_17-210_M-17-210
Brian	Meloy	brian.meloy@stinson.com	Stinson, Leonard, Street LLP	150 S 5th St Ste 2300 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_17-210_M-17-210

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP	33 South Sixth St Ste 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_17-210_M-17-210
Colleen	Sipiorski	ctsipiorski@integrysgroup.com	Minnesota Energy Resources Corporation	700 North Adams Street Green Bay, WI 54307	Electronic Service	No	OFF_SL_17-210_M-17-210
Kristin	Stastny	kstastny@briggs.com	Briggs and Morgan, P.A.	2200 IDS Center 80 South 8th Street Minneapolis, MN 55402	Electronic Service	No	OFF_SL_17-210_M-17-210
Eric	Swanson	eswanson@winthrop.com	Winthrop Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_17-210_M-17-210
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_17-210_M-17-210

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_17-211_M-17-211
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_17-211_M-17-211
Seth	DeMerritt	ssdemerritt@integrysgroup.com	MERC (Holding)	700 North Adams P.O. Box 19001 Green Bay, WI 543079001	Electronic Service	No	OFF_SL_17-211_M-17-211
Emma	Fazio	emma.fazio@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_17-211_M-17-211
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 551012198	Electronic Service	No	OFF_SL_17-211_M-17-211
Daryll	Fuentes	dfuentes@usg.com	USG Corporation	550 W Adams St Chicago, IL 60661	Electronic Service	No	OFF_SL_17-211_M-17-211
Richard	Johnson	Rick.Johnson@lawmoss.com	Moss & Barnett	150 S. 5th Street Suite 1200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_17-211_M-17-211
Amber	Lee	ASLee@minnesotaenergyresources.com	Minnesota Energy Resources Corporation	2665 145th St W Rosemount, MN 55068	Electronic Service	No	OFF_SL_17-211_M-17-211
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_17-211_M-17-211
Brian	Meloy	brian.meloy@stinson.com	Stinson, Leonard, Street LLP	150 S 5th St Ste 2300 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_17-211_M-17-211

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP	33 South Sixth St Ste 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_17-211_M-17-211
Colleen	Sipiorski	ctsipiorski@integrysgroup.com	Minnesota Energy Resources Corporation	700 North Adams Street Green Bay, WI 54307	Electronic Service	No	OFF_SL_17-211_M-17-211
Kristin	Stastny	kstastny@briggs.com	Briggs and Morgan, P.A.	2200 IDS Center 80 South 8th Street Minneapolis, MN 55402	Electronic Service	No	OFF_SL_17-211_M-17-211
Eric	Swanson	eswanson@winthrop.com	Winthrop Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_17-211_M-17-211
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_17-211_M-17-211

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_17-212_M-17-212
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_17-212_M-17-212
Seth	DeMerritt	ssdemerritt@integrysgroup.com	MERC (Holding)	700 North Adams P.O. Box 19001 Green Bay, WI 543079001	Electronic Service	No	OFF_SL_17-212_M-17-212
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 551012198	Electronic Service	No	OFF_SL_17-212_M-17-212
Daryll	Fuentes	dfuentes@usg.com	USG Corporation	550 W Adams St Chicago, IL 60661	Electronic Service	No	OFF_SL_17-212_M-17-212
Amber	Lee	ASLee@minnesotaenergyresources.com	Minnesota Energy Resources Corporation	2665 145th St W Rosemount, MN 55068	Electronic Service	No	OFF_SL_17-212_M-17-212
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_17-212_M-17-212
Brian	Meloy	brian.meloy@stinson.com	Stinson, Leonard, Street LLP	150 S 5th St Ste 2300 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_17-212_M-17-212
Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP	33 South Sixth St Ste 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_17-212_M-17-212
Colleen	Sipiorski	ctsipiorski@integrysgroup.com	Minnesota Energy Resources Corporation	700 North Adams Street Green Bay, WI 54307	Electronic Service	No	OFF_SL_17-212_M-17-212

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Kristin	Stastny	kstastny@briggs.com	Briggs and Morgan, P.A.	2200 IDS Center 80 South 8th Street Minneapolis, MN 55402	Electronic Service	No	OFF_SL_17-212_M-17-212
Eric	Swanson	eswanson@winthrop.com	Winthrop Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_17-212_M-17-212
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_17-212_M-17-212