

June 29, 2021

TRADE SECRET DOCUMENT

Will Seuffert
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, Minnesota 55101-2147

RE: TRADE SECRET Comments of the Minnesota Department of Commerce, Division of Energy Resources
Docket Nos. G6915/M-13-672, G6956/M-15-856, G6960/M-16-214, G6915/M-16-756, G6977/M-17-186,
and G6977/M-17-829

Dear Mr. Seuffert:

The Minnesota Department of Commerce, Division of Energy Resources (Department) provides the following comments in response to the Minnesota Public Utilities Commission's (Commission) Request for Comments dated May 20, 2021 in the following matters:

Dooley's Natural Gas LLC's Petition for Exemption for Small Gas Utility Franchise (Docket No. G6915/M-13-672).

Community Co-ops of Lake Park's Petition for Exemption for Small Gas Utility Franchise (Docket No. G6956/M-15-856).

United Natural Gas LLC's Petition for Exemption for Small Gas Utility Franchise (Docket No. G6960/M-16-214).

Dooley's Natural Gas II LLC's Petition for Approval of a Small Gas Utility Franchise (Docket No. G6915/M-16-756).

Lake Region Energy Services Petition for Approval of a Small Gas Utility Franchise (Docket No. G6977/M-17-186).

The Department recommends that the Commission include an additional docket, Docket No. G6977/M-17-829 on the list for this proceeding in future years. This docket was not included in the Commission's Request for Comments but it appears it should be included. The Department also recommends the Commission approve the 2021 compliance filings for these six dockets. The Department is available to answer any questions the Commission may have.

Sincerely,

/s/ JOHN KUNDERT
Financial Analyst

JK/ar
Attachment



Before the Minnesota Public Utilities Commission

TRADE SECRET Comments of the Minnesota Department of Commerce Division of Energy Resources

Docket Nos. G6915/M-13-672, G6956/M-15-856, G6960/M-16-214,
G6915/M-16-756, G6977/M-17-186, and G6977/M-17-829

I. PROCEDURAL HISTORY

On May 20, 2021 the Minnesota Public Utilities Commission (Commission) issued a notice of comment period (Notice) relevant to the first five of these proceedings. The Notice identified one issue: “Should the Commission accept the compliance filings submitted by Community Co-Ops of Lake Park, United Natural Gas, LLC, Lake Region Energy Services Inc., Dooley’s Natural Gas LLC and Dooley’s Natural Gas II, LLC?”

The Notice also listed two topics for comments:

- Have the small gas utilities complied with the Commission’s November 9, 2018 Order?
- Are there any other issues or concerns related to this matter?

In its November 9, 2018 ORDER DETERMINING COMPLIANCE WITH COMMISSION ORDERS AND ESTABLISHING FILING REQUIREMENTS (2018 Order), the Commission standardized the annual reporting requirements for the four small gas utilities covered by this Order and required them to file a report or letter annually by May 1 that provided updates to the data filed for 2019. That information included:¹

- A. Updated customer counts, plus a statement that the utility does not discriminate between in-muni/out-muni customers, and if it does, why;
- B. Any municipality-approved rate changes that occurred in the prior year and when these changes went into effect. All small gas utilities must comply with Minn. Stat. § 216B.16, subp. 12 (b), which states “The public utility shall file with the commission and the department all initial and subsequent changes in rates, tariffs, and contracts for

¹ The four small gas utilities (the Companies) are: 1) Dooley’s Natural Gas; 2) Community Co-ops of Lake Park; 3) Lake Region Energy Services, and 4) United Natural Gas.

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service outside the municipality at least 30 days in advance of implementation.

- C. All changes to its tariff book in redlined and final revised tariff form;
- D. A copy of its cold weather disconnection notice sent to the customers, including how the notice was communicated and date communicated (Minn. Stat. § 216B.096, Minnesota’s Cold Weather Rule);
- E. A copy of any utility disconnection reports served to any of the municipalities as required by Minn. Stat. § 216B.0976 – Minnesota’s Notice to Cities of Utility Disconnection;
- F. A copy of its notice sent to customers who are in arrears, pursuant to the utility’s obligation under Minn. Stat. § 216B.098 – Minnesota’s Residential Customer Protections, along with any policy not clearly identified in the tariffs regarding budget billing plans, payment arrangements, and under-charge repayment.

The 2018 Order also allowed the exempt small gas utilities to file a letter stating that there were no changes to the data filed in the 2019 report if that were the case.

Each of the four affected companies filed their annual compliance reports on or before the Commission’s May 1, 2021 deadline.²

II. DEPARTMENT ANALYSIS

The Department reviewed the Companies’ 2021 compliance filings or letters to determine if they were consistent with the requirements contained in the Commission’s 2018 Order. The Department organized these comments by docket number using a standardized checklist.

A. COMPLIANCE FILINGS

1. *Dooley’s Natural Gas LLC (Docket No. G6915/M-13-672)*

Table 1 summarizes Dooley’s Natural Gas LLC 2021 compliance filing and ensuing communications.

² The numbering in this docket is a bit unusual. The Department identifies the utilities’ compliance filings made in April 2021 as their 2021 compliance filings, even though the information contained in those filings covers the 2020 calendar year.

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Table 1 – Dooley’s Natural Gas LLC Compliance Filing Checklist

Requirement	Information Included	Notes/Comments
Customer Count	Yes	Summary information only.
Non-discrimination statement or explanation	Yes	
List of municipality approved rate changes	Yes	No rate changes.
List of municipality approved tariff changes	Yes	No tariff changes.
Copy of Cold Weather disconnection notice	No	Company provided generic copies of disconnection notice sent to customers in a supplemental email. ³
Date and delivery method for Cold Weather disconnection notice	Yes	Sent September 10, 2020
Copies of any utility disconnection reports served to any of the municipalities required by statute	Yes	Utility stated that it disconnected 6 customers and then reconnected those same 6 customers after resolution of their bills.
Copy of customer arrearage forms	Yes	Unchanged from prior year.
Copy of any policy not included in tariff related to budget billing plans, payment arrangements and under-charge repayment	Yes	Unchanged from prior year.

The Department concludes that Dooley’s Natural Gas LLC has complied with the Order’s requirements for Docket No. G6915/M-13-672.

³ A copy of Dooley’s disconnection notice is included in Attachment A.

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2. *Community Co-ops of Lake Park, (Docket No. G6956/M-15-856)*

Table 2 summarizes Community Co-Ops of Lake Park’s 2021 compliance filing.

Table 2 – Community Co-Op of Lake Park’s Compliance Filing Checklist

Requirement	Information Included	Notes/Comments
Customer Count	Yes	Summary information only.
Non-discrimination statement or explanation	Yes	
List of municipality approve rate changes	Yes	No rate changes.
List of municipality approve tariff changes	Yes	No tariff changes.
Copy of Cold Weather disconnection notice	No	No change to 2020 form according to filing.
Date and delivery method for Cold Weather disconnection notice	Yes	August 25, 2020, U.S. mail.
Copies of any utility disconnection reports served to any of the municipalities required by statute	Yes	Stated: “As per statute since none of the municipalities request notice of disconnection we currently are not sending any notices to them.”
Copy of customer past due/arrearage forms	No	No change to 2020 forms according to filing.
Copy of any policy not included in tariff related to budget billing plans, payment arrangements and under-charge repayment	No	No change to 2020 forms according to filing.

The Department concludes that Community Co-Ops of Lake Park complied with the Order’s requirements for Docket No. G6956/M-15-856.

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3. *United Natural Gas LLC (Docket No. G6960/M-16-214)*

Table 3 summarizes United Natural Gas’s 2019 compliance filing.

Table 3 – United Natural Gas’s Compliance Filing Checklist

Requirement	Information Included	Notes/Comments
Customer Count	Yes	Customer information provided by class and by municipal/incidental jurisdiction.
Non-discrimination statement or explanation	Yes	
List of municipality approve rate changes	Yes	No approved rate changes.
List of municipality approve tariff changes	Yes	No approved tariff changes.
Copy of Cold Weather disconnection notice	Yes	Included a copy of the document.
Date and delivery method for Cold Weather disconnection notice	Yes	September 1, 2020 by U.S. Mail
Copies of any utility disconnection reports served to any of the municipalities required by statute	Yes	United stated that it didn’t disconnect any customers in 2019 or 2020.
Copy of customer past due/arrearage forms	Yes	Included in the filing.
Copy of any policy not included in tariff related to budget billing plans, payment arrangements and under-charge repayment	No	Included in the filing.

The Department concludes that United Natural Gas complied with the Order’s requirements for Docket No. G6960/M-16-214.

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4. *Dooley’s Natural Gas II LLC (Docket No. G6915/M-16-756)*

Table 4 summarizes the Department’s review of Dooley’s Natural Gas LLC II 2021 compliance filing.

Table 4 – Dooley’s Natural Gas II LLC Compliance Filing Checklist

Requirement	Information Included	Notes/Comments
Customer Count	Yes	Summary information only.
Non-discrimination statement or explanation	Yes	
List of municipality approve rate changes	Yes	No approved rate changes.
List of municipality approve tariff changes	Yes	No approved tariff changes.
Copy of Cold Weather disconnection notice	No	Company provided generic copies of disconnection notice sent to customers in a supplemental email. ⁴
Date and delivery method for Cold Weather disconnection notice	Yes	September 10, 2020
Copies of any utility disconnection reports served to any of the municipalities required by statute	Not in initial filing	Utility stated that it disconnected 6 customers and then reconnected those same 6 customers after resolution of their bills.
Copy of customer arrearage forms	Yes	Unchanged from prior year.
Copy of any policy not included in tariff related to budget billing plans, payment arrangements and under-charge repayment	Not in initial filing	Unchanged from prior years.

The Department’s review concludes that Dooley’s Natural Gas II LLC has now complied with the Order’s requirements for Docket G6915/M-16-756.

⁴ See Attachment A.

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5. *Lake Region Energy Services (Docket No. G6977/M-17-186)*

Table 5 summarizes Lake Region Energy Services 2021 compliance filing for this docket.

Table 5 – Lake Region Energy Services LLC Compliance Filing Checklist

Requirement	Information Included	Notes/Comments
Customer Count	Yes	Customer by class information provided
Non-discrimination statement or explanation	Yes	
List of municipality approve rate changes	Yes	Rate change to small volume transport rate.
List of municipality approve tariff changes	Yes	Approved tariff changes included in attachment.
Copy of Cold Weather disconnection notice	Yes	Included as an attachment
Date and delivery method for Cold Weather disconnection notice	Yes	LRES Fall Newsletter, no date and delivery method
Copies of any utility disconnection reports served to any of the municipalities required by statute	Yes	Stated: "LRES has provided no municipalities with disconnection reports pursuant to Minn. Stat. § 216B.0976. No municipality served by LRES has requested any such reports."
Copy of customer arrearage forms	Yes	Unchanged since most recent filing
Copy of any policy not included in tariff related to budget billing plans, payment arrangements and under-charge repayment	No	Unchanged since most recent filing

The Department concludes that Lake Region Energy Services complied with the Order's requirements for Docket No. G6977/M-17-186.

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6. *Lake Region Energy Services (Docket No. G6977/M-17-829)*

Table 6 summarizes Lake Region Energy Services 2021 compliance filing for this docket. The Department also notes that LRES included this information in its compliance filing and that the Department agrees with LRES that this docket should be included on the Commission list of dockets in future years for this proceeding.

Table 6 – Lake Region Energy Services LLC Compliance Filing Checklist

Requirement	Information Included	Notes/Comments
Customer Count	Yes	Customer by class information provided
Non-discrimination statement or explanation	Yes	
List of municipality approve rate changes	Yes	Rate change to small volume transport rate.
List of municipality approve tariff changes	Yes	Approved tariff changes included in attachment.
Copy of Cold Weather disconnection notice	Yes	Included as an attachment
Date and delivery method for Cold Weather disconnection notice	Yes	LRES Fall Newsletter, no date and delivery method
Copies of any utility disconnection reports served to any of the municipalities required by statute	Yes	Stated: "LRES has provided no municipalities with disconnection reports pursuant to Minn. Stat. § 216B.0976. No municipality served by LRES has requested any such reports."
Copy of customer arrearage forms	Yes	Unchanged since most recent filing
Copy of any policy not included in tariff related to budget billing plans, payment arrangements and under-charge repayment	No	Unchanged since most recent filing

The Department concludes that Lake Region Energy Services complied with the Order’s requirements for Docket No. G6977/M-17-829.

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B. OTHER TOPICS

The Department notes that, based on information that all the affected natural gas utilities provided, the total number of customers served by all of the companies at the end of 2020 [**TRADE SECRET BEGINS increased by 7.6% TRADE SECRET ENDS**] on average compared to 2018 and 2019. **TRADE SECRET** Attachment B summarizes this information.

III. RECOMMENDATION

The Department recommends that the Commission include an additional docket, Docket No. G6977/M-17-829 on the list for this proceeding in future years. This docket was not included in the Commission's Request for Comments but it appears it should be included. The Department also recommends the Commission approve the 2021 compliance filings for these six dockets.

/ar



WARNING!

YOUR GAS WILL BE SHUT OFF!

Dear Valued Customer,

Date: / /

Our records show that your account is now **120 days past due** and you now fall into our disconnection category. Your meter may be locked and service may be disconnected on / / . **This date falls after the Cold Weather Rule ends and meters will not be unlocked until balance is paid in full.**

Please be advised this letter serves as an official notice to the overdue balance on your account and acts as a disconnection notice.

The total amount due on your account is: \$.

Account Id: .

*Reminder that the Cold Weather Rule is in effect from October 15-April 15 each year. **The Cold Weather Rule does not completely protect you from a shut off.** To avoid a disconnection you must act promptly by contacting either Dooley's Natural Gas or your county assistance programs. These programs are here to help you if you are having trouble paying your utility bills. Our website also has information on financial assistance programs as well as the Cold Weather Rule. (www.dooleysnaturalgas.com)

****Fuel assistance may be available to you through your county assistance program.**

Stearns County:

Tri-Cap: 1-888-765-5597

Meeker County:

Heartland: 1-800-770-4081

Your attention to this matter will be greatly appreciated. If you have made a payment on this account within the last 10 days, please accept our apology and disregard this notice.

Sincerely,
Credit Department
Dooley's Natural Gas II
3101 3rd Ave SW
Willmar, MN 56201
320-235-2466

Community Co-Ops of Lake Park (Docket No. G6956/M-15-856)

Number of Customers

Customer Class	2018	2020	Nominal Change	Percentage	
				Change 2018 to 2020	Avg, Ann. % Change
Total	794	1029	235	29.6%	14.8%

Dooley's I LLC & Dooley's II LLC (Docket Nos. G6915/M-13-672 and G6915/M-16-756)

Customer Class	2018	2020	Nominal Change	Percentage		TRADE SECRET ENDS]
				Change 2018 to 2020	Avg, Ann. % Change	
Residential	[TRADE SECRET BEGINS] 1,544	1,567	23	1.5%	0.7%	
Commercial	236	237	1	0.4%	0.2%	
Industrial	15	16	1	6.7%	3.3%	
Ag Heating	58	58	0	0.0%	0.0%	
Ag Drying	30	31	1	3.3%	1.7%	
Total	1,883	1,909	26	1.4%	0.7%	

Lake Region Energy Services (Docket Nos. G6977/M-17-186 and G6977/M-17-829)

Customer Class	2018	2020	Nominal Change	Percentage	
				Change 2018 to 2020	Avg, Ann. % Change
Residential	457	738	281	61.5%	30.7%
Small Commercial	16	17	1	6.3%	3.1%
Large Commercial	4	6	2	50.0%	25.0%
Ag Heating & Drying	10	10	0	0.0%	0.0%
Interruptible	10	10	0	0.0%	0.0%
Small Volume Transport	0	0	0	N/A	N/A
Sub-total	497	781	284	57.1%	28.6%

United Natural Gas (Docket No. G6960/M-16-214)

Municipal Customers	2018	2020	Nominal Change	Percentage	
				Change 2018 to 2020	Avg, Ann. % Change
Residential	302	311	9	3.0%	1.5%
Small Commercial	38	39	1	2.6%	1.3%
Large Commercial	9	9	0	0.0%	0.0%
Interruptible	1	1	0	0.0%	0.0%
Sub-total	350	360	10	2.9%	1.4%

Incidental Customers	2018	2020	Nominal Change	Percentage	
				Change 2018 to 2020	Avg, Ann. % Change
Residential	96	96	0	0.0%	0.0%
Small Commercial	6	6	0	0.0%	0.0%
Large Commercial	32	33	1	3.1%	1.6%
Interruptible	18	21	3	16.7%	8.3%
Sub-total	152	156	4	2.6%	1.3%

Total # of Customers	2018	2020	Nominal Change	Percentage	
				Change 2018 to 2020	Avg, Ann. % Change
Residential	398	407	9	2.3%	1.1%
Small Commercial	44	45	1	2.3%	1.1%
Large Commercial	41	42	1	2.4%	1.2%
Interruptible	19	22	3	15.8%	7.9%
Total	502	516	14	2.8%	1.4%

Total

Number of Customers

Customer Class	2018	2020	Nominal Change	Percentage		TRADE SECRET ENDS]
				Change 2018 to 2020	Avg, Ann. % Change	
Residential	[TRADE SECRET BEGINS] 2399	2712	313	13%	6.5%	
Commercial/Industrial	454	462	8	2%	0.9%	
Interruptible	29	32	3	10%	5.2%	
Other	794	1029	235	30%	14.8%	
Total	3676	4235	559	15%	7.6%	

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
Trade Secret Comments**

**Docket No. G6915/M-13-672, G6956/M-15-856, G6960/M-16-214,
G6915/M-16-756, G6977/M-17-186, and G6977/M-17-829**

Dated this 29th day of June 2021

/s/Sharon Ferguson

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_13-672_Official Service List 13-672
Randy	Dooley	rdooley@dooleypetro.com	Dooley's Natural Gas LLC	3101 3rd Ave SW Willmar, MN 56201	Electronic Service	No	OFF_SL_13-672_Official Service List 13-672
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_13-672_Official Service List 13-672
Steven C	Jones	cityadmin@hcinet.net	City of Clara City	215 First St NW PO Box 560 Clara City, MN 56222	Electronic Service	No	OFF_SL_13-672_Official Service List 13-672
Brian	Meloy	brian.meloy@stinson.com	STINSON LLP	50 S 6th St Ste 2600 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_13-672_Official Service List 13-672
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_13-672_Official Service List 13-672
Steve	Sarvi	rushford@acegroup.cc	Rushford Electric Dept.	PO Box 430 Rushford, MN 55971	Electronic Service	No	OFF_SL_13-672_Official Service List 13-672
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th PI E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_13-672_Official Service List 13-672
James M	Strommen	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered	150 S 5th St Ste 700 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_13-672_Official Service List 13-672

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
David	Blomseth	davidb@communitycoops.com	Community Co-ops of Lake Park	PO Box 329 14583 Hwy 10 W Lake Park, MN 56554	Electronic Service	No	OFF_SL_15-856_M-15-856
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_15-856_M-15-856
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_15-856_M-15-856
Jessica	Halvorson	jhalvor@arvig.net	Wambach & Hanson Law Office, P.C.	PO Box 340 Mahnomen, MN 56557	Electronic Service	No	OFF_SL_15-856_M-15-856
Elroy E.	Hanson	ehanson@arvig.net	Wambach & Hanson Law Office PC	304 N Main St PO Box 340 Mahnomen, MN 56557	Electronic Service	No	OFF_SL_15-856_M-15-856
Bruce	Nelson	tbnelson@loretel.net	Community Co-ops of Lake Park	PO Box 329 14583 Hwy 10 W Lake Park, MN 56554	Electronic Service	No	OFF_SL_15-856_M-15-856
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_15-856_M-15-856
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th PI E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_15-856_M-15-856

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_16-214_Official
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_16-214_Official
Gregory	Hauptert	ghauptert@parthenonagency.com	Sobalvarro & Hauptert	11 7th Ave. N., Suite 100 St. Cloud, Minnesota 56303	Electronic Service	No	OFF_SL_16-214_Official
Tony	Kammerlander	tony.kammerlander@ufcmn.com	United Natural Gas	PO Box 461 Winthrop, MN 55396	Electronic Service	No	OFF_SL_16-214_Official
Robert	Larsen	robert.larsen@lowersioux.com	Lower Sioux Indian Community	PO Box 308 39527 Reservation Highway 1 Morton, MN 56270	Electronic Service	No	OFF_SL_16-214_Official
Brian	Pendleton	N/A		PO Box 308 39527 Reservatio Hwy 1 Morton, MN 56270	Paper Service	No	OFF_SL_16-214_Official
Al	Poehler	ctclerk@comcast.net	City of Courtland	300 Railroad St Courtland, MN 56021	Electronic Service	No	OFF_SL_16-214_Official
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_16-214_Official
Darren	Saffert	lafcityclerk@gmail.com	City of Lafayette	700 Ninth St PO BOX 375 Lafayette, MN 56054	Electronic Service	No	OFF_SL_16-214_Official
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th Pl E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_16-214_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Nizhoni	Smith	nizhoni.smith@lowersioux.com	Lower Sioux Indian Community	PO Box 308 39527 Reservation Highway 1 Morton, MN 56270	Electronic Service	No	OFF_SL_16-214_Official
James	Stenson		Nicollet County	501 South Minnesota Avenue St. Peter, MN 56082	Paper Service	No	OFF_SL_16-214_Official
Teresa	Wenninger	teresa.wenninger@ufcmn.com	United Farmers Cooperative	PO Box 461 Winthrop, MN 55396	Electronic Service	No	OFF_SL_16-214_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_16-756_Official Service List 16-756
Randy	Dooley	rdooley@dooleypetro.com	Dooley's Natural Gas LLC	3101 3rd Ave SW Willmar, MN 56201	Electronic Service	No	OFF_SL_16-756_Official Service List 16-756
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_16-756_Official Service List 16-756
Steven C	Jones	cityadmin@hcinet.net	City of Clara City	215 First St NW PO Box 560 Clara City, MN 56222	Electronic Service	No	OFF_SL_16-756_Official Service List 16-756
Brian	Meloy	brian.meloy@stinson.com	STINSON LLP	50 S 6th St Ste 2600 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_16-756_Official Service List 16-756
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_16-756_Official Service List 16-756
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th PI E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_16-756_Official Service List 16-756
James M	Strommen	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered	150 S 5th St Ste 700 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_16-756_Official Service List 16-756

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_17-186_M-17-186
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_17-186_M-17-186
Ryan D	Fullerton	r.fullerton@pemlaw.com	Pemberton, Sorlie, Rufer & Kershner	110 North Mill St Fergus Falls, MN 56537	Electronic Service	No	OFF_SL_17-186_M-17-186
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_17-186_M-17-186
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th PI E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_17-186_M-17-186
Tim	Thompson	tthompson@lrec.coop	Lake Region Electric Cooperative	PO Box 643 1401 South Broadway Pelican Rapids, MN 56572	Electronic Service	No	OFF_SL_17-186_M-17-186

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_17-829_M-17-829
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_17-829_M-17-829
Ryan D	Fullerton	r.fullerton@pemlaw.com	Pemberton, Sorlie, Rufer & Kershner	110 North Mill St Fergus Falls, MN 56537	Electronic Service	No	OFF_SL_17-829_M-17-829
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_17-829_M-17-829
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th PI E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_17-829_M-17-829
Tim	Thompson	tthompson@lrec.coop	Lake Region Electric Cooperative	PO Box 643 1401 South Broadway Pelican Rapids, MN 56572	Electronic Service	No	OFF_SL_17-829_M-17-829