

June 1, 2015

Daniel P. Wolf
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. E001/M-15-317

Dear Mr. Wolf:

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

Interstate Power and Light Company's 2014 Annual Safety, Reliability, and Service Quality Report and Proposed SAIFI, SAIDI and CAIDI Indices for 2015.

The Petition was filed on April 1, 2015 by:

Samantha C. Norris
Senior Attorney
Interstate Power and Light Company
200 First Street SE
P.O. Box 351
Cedar Rapids, IA 52406-0351

The Department recommends that the Minnesota Utilities Commission **accept Interstate Power and Light Company's filing, pending the submission of additional information.**

Sincerely,

/s/ ANGELA BYRNE
Financial Analyst
651-539-1820

AB/ja
Attachment

BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

**COMMENTS OF THE
MINNESOTA DEPARTMENT OF COMMERCE
DIVISION OF ENERGY RESOURCES**

DOCKET No. E001/M-15-317

I. BACKGROUND

Minnesota Rules, Chapter 7826 (effective January 28, 2003) were developed as a means for the Minnesota Public Utilities Commission (Commission) to establish safety, reliability and service quality standards for utilities “engaged in the retail distribution of electric service to the public” and to monitor their performance as measured against those standards.¹ There are three main annual reporting requirements set forth in the rule. These are:

- 1) the annual safety report (Minnesota Rules, part 7826.0400),
- 2) the annual reliability report (Minnesota Rules, part 7826.0500, subp. 1 and 7826.0600, subp. 1), and
- 3) the annual service quality report (Minnesota Rules, part 7826.1300).

On April 1, 2015, IPL filed a petition (2015 Annual Report) to comply with Minnesota Rules Chapter 7826.

The Minnesota Department of Commerce (Department) notes that the Commission’s June 5, 2009 Order in Docket No. E999/CI-08-948 (08-948 docket) contained the following order point:

Beginning on April 1, 2010 and annually thereafter, utilities shall file reports on past, current, and planned smart grid projects, with a description of those projects, including: total costs, cost effectiveness, improved reliability, security, system performance, and societal benefit, with their electric service quality reports.

¹ For ease of reference, the Department attaches to these comments Minnesota Rules, Chapter 7826.

In its December 31, 2015 *Order Closing Docket*, the Commission stated,

While [the annual smart grid reports and stakeholder workshops] have served their informational purpose well, the Commission believes that the time has come to close this docket and to consider, in a more focused way, how the Commission can most effectively facilitate the development of an integrated, dynamic grid.

As a result, the regulated utilities are no longer required to file smart grid reports in their annual service quality reports.

II. SUMMARY OF REPORT AND DEPARTMENT ANALYSIS

The Department reviewed IPL's 2015 Annual Report to assess compliance with Minnesota Rules, Chapter 7826. The Department used information from past annual reports to facilitate the identification of issues and trends regarding IPL's performance.

A. ANNUAL SAFETY REPORT

The Annual Safety Report consists of two parts:

- A. a summary of all reports filed with the United States Occupational Safety and Health Administration (OSHA) and the Occupational Safety and Health Division of the Minnesota Department of Labor and Industry (OSHD) during the calendar year; and
- B. a description of all incidents during the calendar year in which an injury requiring medical attention or property damage resulting in compensation occurred as a result of downed wires or other electrical system failures and all remedial action taken as a result of any injuries or property damage described.

IPL reported that it is not required to submit reports to OSHA, though it does comply with OSHA record-keeping requirements. IPL submitted completed copies of OSHA's Form 300A, "Summary of Work-Related Injuries and Illnesses" covering incidents that occurred during 2014 for each of the Company's Minnesota facilities.

IPL reported that there were no incidents of injuries requiring medical attention as a result of electrical system failures in 2014. The following table summarizes IPL's most recent and past Annual Reports regarding property damage claims.

Table 1: Property Damage Reimbursement

	Claims	Cause	Total Amount Paid
2005	3	Crew errors, customer overlooked after weather-related outage	\$3,741.20
2006	3	Equipment failure, crop damage when repairing line, low clearance from road rebuild	\$2,076.10
2007	6	Crop damage when replacing pole, equipment failure	\$4,435.00
2008	3	Crew error, tree trimming accident, incorrectly installed meter	\$3,938.00
2009	6	Circuit breakers blew when power came back on, transformer/neutral power surge, transformer oil leak, fire, underground secondary shorted out	\$7,957.60
2010	3	Rotten pole & line fell on car, failed transformer, storm damaged meter socket	\$4,689.19
2011	3	Killed tree, customer's service disconnected in error, service neutral was pulled apart at old splice	\$1,773.41
2012	4	Voltage damage, damage from pole anchor, contractor strike from incorrect locate by IPL, trees removed without permission	\$21,705.26
2013	3	Equipment fire, IPL vehicle contact with overhead conductor, dug into UG telephone cable	\$2,542.82
2014	2	Switching error resulted in higher voltage; IPL OH Conductor was too low and was caught/pulled down by a truck.	\$17,234.26

The Department acknowledges IPL's fulfillment of the requirements of Minnesota Rules, part 7826.0400.

B. ANNUAL RELIABILITY REPORT

Minnesota Rules, part 7826.0500 requires each utility to file an annual report that includes the following information:

1. reliability performance,
2. storm-normalization method,
3. action plan for remedying any failure to comply with reliability goals,
4. bulk power supply interruptions,
5. major service interruptions,
6. circuit interruption data (identify worst-performing circuit),
7. known instances in which nominal voltages did not meet American National Standards Institute (ANSI) standards,
8. work center staffing levels, and
9. any other relevant information.

1. Reliability Performance

IPL's Minnesota service territory consists of two work centers. In Docket No. E001/M-14-282, the Commission set IPL's reliability goals as follows:²

Winnebago work center:

SAIDI (average number of minutes a customer is without power) = 59.81
SAIFI (average number of times a customer is without power) = 0.90
CAIDI (average minutes per outage for customers that lose power) = 66.17

Albert Lea work center:

SAIDI = 80.30
SAIFI = 1.02
CAIDI = 78.44

The Department notes that the goals remained unchanged from 2008 through 2014. IPL's reliability report shows that the Company met three of its six 2014 goals. Table 2 compares IPL's 2014 reliability goals and performance.

Table 2: IPL's 2014 Reliability Goals and Performance

Work Center	SAIDI		SAIFI		CAIDI	
	Goal	Actual	Goal	Actual	Goal	Actual
Winnebago	59.81	95.30	0.90	0.89	66.17	107.50
Albert Lea	80.30	72.50	1.02	0.83	78.44	87.50

The Department acknowledges IPL's fulfillment of the requirements of Minnesota Rules, part 7826.0500, subp. 1A, B, and C. See Section II.B.3 below for a discussion of IPL's 2014 reliability performance.

2. Storm-Normalization Method

Since 2004, IPL has used the method set forth in the IEEE 1366 standard (IEEE 2.5 beta method). IPL reported that, in 2014, this method resulted in two event exclusions from reliability index calculations for the Winnebago work center and one event exclusion for the Albert Lea work center.

² Minnesota Rules, part 7826.0200 defines SAIDI, SAIFI and CAIDI. The Department notes that SAIDI = SAIFI * CAIDI.

In the Winnebago work center, a major winter storm on February 20, 2014, as well as high winds and lightning during June 16-20, 2014, qualified for exclusion. The Albert Lea work center also experienced high winds during June 16-20, 2014. The following table shows IPL's normalized versus non-normalized reliability indices for 2014.

Table 3: Normalized versus Non-Normalized Indices

2014	SAIDI Normal	SAIDI non-Normal	SAIFI Normal	SAIFI non-Normal	CAIDI Normal	CAIDI non-Normal
Albert Lea	72.5	149.0	0.83	1.09	87.5	136.1
Winnebago	95.3	178.0	0.89	1.21	107.5	147.4

The Department acknowledges IPL's fulfillment of the requirements of Minnesota Rules, part 7826.0500, subp. 1D.

3. *Action Plan to Improve Reliability*

In the Company's Albert Lea work center, IPL met two of its three reliability goals in 2014. Regarding this performance, IPL stated the following,

IPL did not meet the CAIDI goal of 78.44, however, the 2014 result of 87.5 was a marked improvement over the 2013 result of 117.51. IPL attributes the CAIDI result partially to the planned outages taken to perform system maintenance and complete the scheduled life-extension projects. Crews must de-energize lines to safely complete specific line work tasks and in 2014, 29% of all outage minutes were planned outages for these tasks.

In its Winnebago work center, IPL did not meet its SAIDI and CAIDI goals for 2014. Regarding its performance in this work center, IPL stated,

In 2014, IPL met the SAIFI goal, but not the SAIDI or CAIDI goals in the Winnebago Zone in part due to planned outages taken to perform construction and maintenance on the system. The frequency of outages has not increased indicating the system is functioning as designed, however, this operating zone is very rural causing the time to respond and restore service from isolated outages to be longer than in a more urban setting.

While performance in the Winnebago work center was slightly worse than in 2013, performance in the larger Albert Lea work center improved significantly. In fact, the 2014 SAIDI and SAIFI for this work center were below the most recent historic five-year averages, and the 2014 CAIDI was very close to the five-year average.

On April 30, 2015, the Commission approved the sale of IPL's Minnesota electric distribution system and assets, and transfer of service rights and obligations in Minnesota, to Southern Minnesota Energy Cooperative (SMEC), an association of twelve electric cooperatives created for the purposes of purchasing and operating IPL's Minnesota electric operations.³ The sale should close in 2015. Minnesota Rules, part 7826.0100 states:

This chapter applies to all persons, corporations, or other legal entities engaged in the retail distribution of electric service to the public, with the following exceptions:

- A. cooperative electric associations;
- B. municipal utilities;
- C. persons distributing electricity only to tenants or cooperative or condominium owners in buildings owned, leased, or operated by those persons;
- D. persons distributing electricity only to occupants of a manufactured home or trailer park owned, leased, or operated by those persons; and
- E. persons distributing electricity to fewer than 25 persons.

Therefore, as of the close of the sale, it appears that IPL will no longer be subject to Minnesota Rules Chapter 7826. With that in mind, the Department concludes that providing an action plan for remedying IPL's failure to comply with its 2014 reliability goals is unnecessary. As such, the Department does not have a recommendation regarding IPL's action plan.⁴

4. Bulk Power Supply Interruptions

IPL submitted a list summarizing the nine bulk power supply interruptions that occurred in 2014. This list includes information regarding the cause, duration, and remediation of each interruption. The most common cause listed for the bulk power supply interruptions in 2014 is "Foreign Utility_AE."

The Department acknowledges IPL's fulfillment of the requirements of Minnesota rules, part 7826.0500, subp. 1F.

5. Major Service Interruptions

Copies of the Outage Reports sent to the Commission's Consumer Affairs Office pursuant to Minnesota Rules, part 7826.0700 are included in IPL's 2015 Annual Report. Several times during the year, multiple reports were sent pertaining to a single weather event.

The Department acknowledges IPL's fulfillment of the requirements of Minnesota Rules, part 7826.0500, subp. G.

³ Docket No. E115,E140,E105,E139,E124,E145,E001,E132,E114,E6521,E142,E135/PA-14-322.

⁴ See Section II.E. for the Department's recommendation regarding reporting of 2015 data.

6. *Worst Performing Circuit*

Minnesota Rules, part 7826.0500, subp. 1H requires information on the utility's worst performing circuit, including the circuit's SAIDI, SAIFI, and CAIDI. IPL indicated that it has a ranking process in order to better identify its worst performing circuits that otherwise may not have been identified if using only the SAIDI and SAIFI of a circuit. IPL stated that certain outages beyond the control of IPL or which may not reflect the physical conditions of the equipment have been excluded from the analysis. These types of events include: planned interruptions; interruptions caused by the failure of another utility's transmission or distribution system which feeds the IPL distribution system; interruptions caused by the public, such as vehicle accidents, customers dropping tree limbs in lines while trimming, etc.; interruptions caused by personnel errors such as switching errors or accidental contact during live utility work; and interruptions due to flooding.

IPL identified the worst performing circuit in each work center, the main causes of the outages, and remedial measures taken. The worst performing circuit in the Albert Lea work center, according to IPL, experienced non-preventable tree damage caused by high winds in April, as well as a lightning strike later the same month. The Company noted that the worst performing circuit in the Winnebago work center experienced an outage in February due to a snow and ice storm, followed by high wind and lightning in June.

The Department uses historical data to identify potential areas of concern regarding any feeders that appear multiple times as a worst performing feeder. After reviewing ten years of historical data, the Department concludes that there is no concern with any specific feeder at this time. The Department acknowledges IPL's fulfillment of Minnesota Rules, part 7826.0500, subp. 1G.

7. *Compliance with ANSI Voltage Standards*

IPL reported that there was one instance in 2014 where nominal voltages exceeded ANSI standards. On June 6, 2014, fourteen customers experienced voltage in excess of 600 volts for approximately 2 seconds.

In its Annual Safety Report, discussed above in Section II.A., IPL reported paying approximately \$16,000 in a property damage claim for a switching error that resulted in higher voltage to customers. The Department assumes this claim is related to the June 6th event.

The Department acknowledges IPL's fulfillment of Minnesota Rules, part 7826.0500, subp. 1I.

8. *Work Center Staffing Levels*

The following table summarizes IPL's work center staffing levels.

Table 5: Work Center Staffing Level (in Full-Time Equivalent)

	Albert Lea	Winnebago	Total
2005	20.6	18.0	38.6
2006	20.6	17.0	37.6
2007	20.6	17.0	37.6
2008	25.0	18.0	43.0
2009	25.0	18.0	43.0
2010	25.0	17.0	42.0
2011	23.0	17.0	40.0
2012	23.0	17.0	40.0
2013	18.0	16.0	34.0
2014	18.0	15.0	33.0

In 2013, IPL had hired five apprentices, four of which were to be fully qualified to respond to trouble calls by the end of 2014. According to IPL, those four workers are now fully qualified. Despite adding five additional workers, staffing was relatively stable during 2014. In its report, IPL stated,

Overall number of responders did not increase in 2014 as other journeymen line workers transferred to other work locations at IPL or chose to leave IPL due to the proposed sale of the IPL electric distribution facilities.

The Department acknowledges IPL's fulfillment of Minnesota Rules, part 7826.0500, subp. 1J.

C. *PROPOSED RELIABILITY STANDARDS FOR 2015*

1. *Proposed Reliability Goals*

In its 2015 Annual Report, IPL proposed the following reliability goals for 2015:

Table 6: IPL's Reliability Indices – Proposed 2015 Goals

Work Center	SAIDI		SAIFI		CAIDI	
	Proposed	2014 Goal	Proposed	2014 Goal	Proposed	2014 Goal
Winnebago	93.7	59.81	0.87	0.90	107.5	66.17
Albert Lea	81.30	80.30	1.14	1.02	80.8	78.44

IPL stated that its proposed goals were developed based on IPL's previous five years of performance data and calculated by determining the mean, the median, and the mean with the highest and lowest performance indices excluded. The Company stated that it selected as its proposed goals the lowest (hardest to achieve) of the results of those calculations for each index.

The Department notes that this is the same method IPL used in its 2009 through 2014 Annual Reports. In all cases, the Commission did not approve this method and instead, set IPL's 2009 through 2014 goals at the same level as its 2008 goals, as recommended by the Department.⁵

In light of the sale of IPL's assets to SMEC discussed above in Section II.B.3, the Department concludes that setting 2015 goals for IPL is unnecessary. As such, the Department does not have a recommendation regarding IPL's proposed 2015 goals and provides the following graphs for informational purposes only.

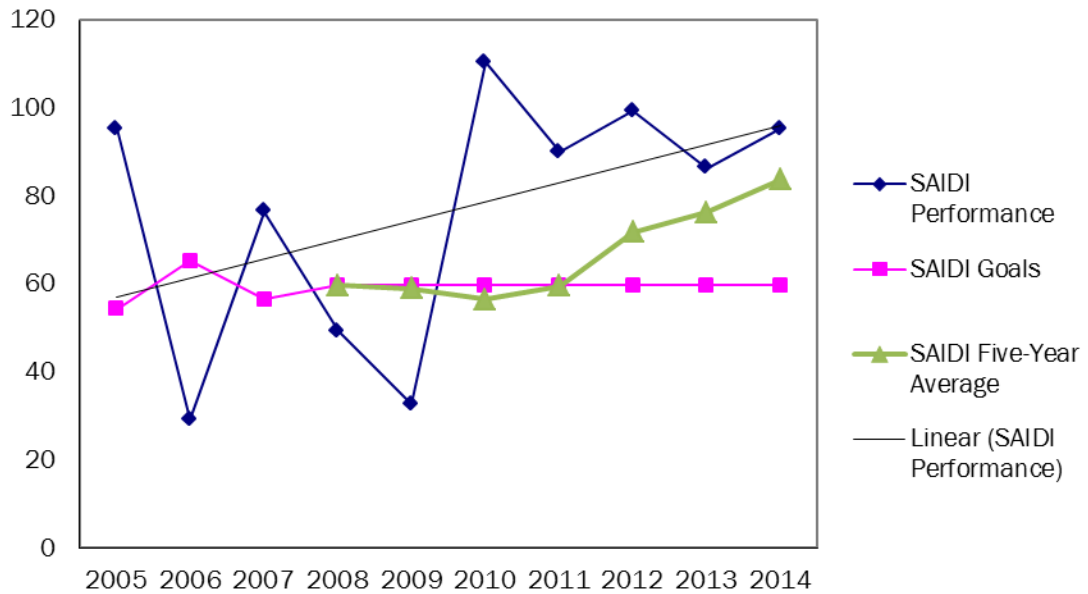
2. *Winnebago Work Center*

The following graphs represent reliability performance compared to goals in the Winnebago work center. Note that performance numbers that are less than the goals represent performance that exceeds goals.⁶

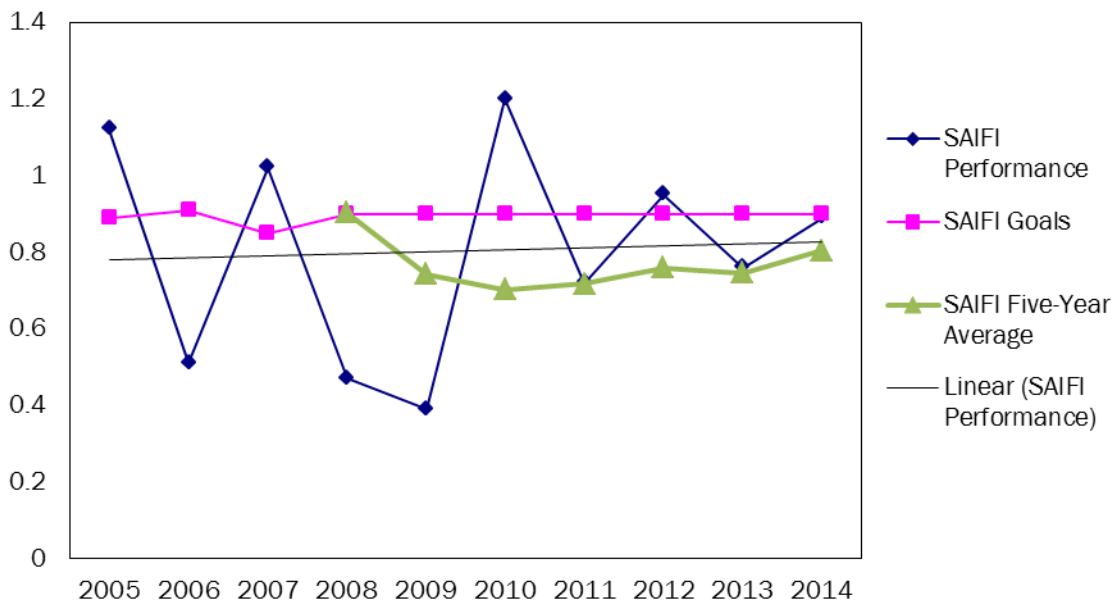
⁵ Please see the Department's initial comments and the Commission's Orders in Docket Nos. E001/M-09-344, E001/M-10-291, E001/M-11-277, E001/M-12-320, E001/M-13-249, and E001/M-14-282.

⁶ The "Linear" line is the overall linear trend in IPL's performance results since 2005. Note that an increasing line indicates overall declining performance. The green line (triangle data points) shows where IPL's goals would have been set if the Commission had continued to utilize the rolling, five-year performance average since 2008. Note that the Goals lines coincide with the Five-Year Average lines through 2008, after which the goals were frozen.

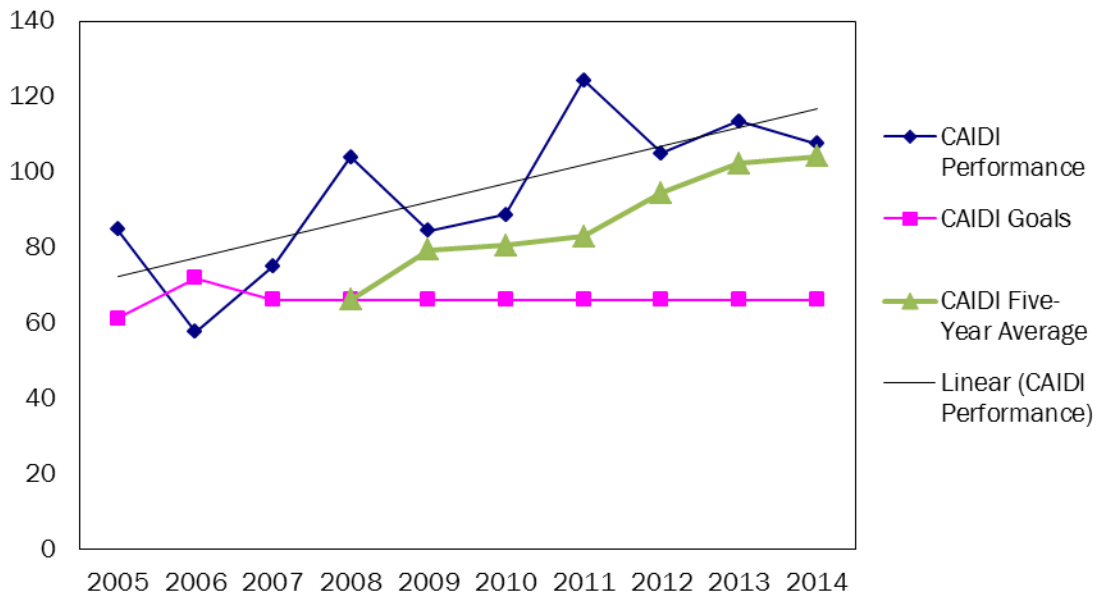
**Graph 1: SAIDI Performance vs. Goals
 Winnebago Work Center**



**Graph 2: SAIFI Performance vs. Goals
 Winnebago Work Center**



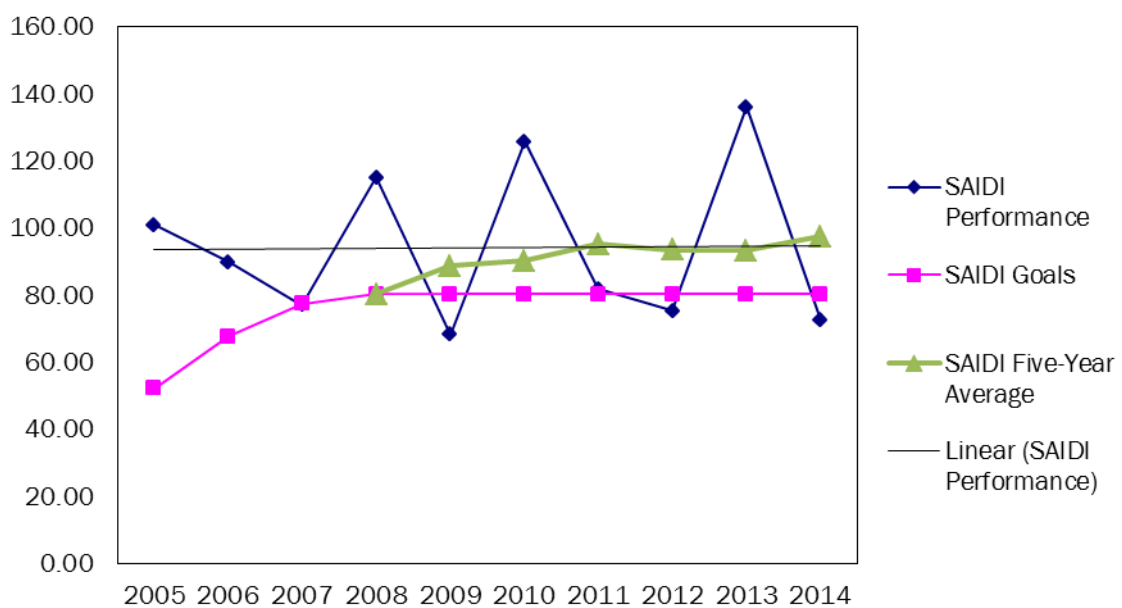
**Graph 3: CAIDI Performance vs. Goals
 Winnebago Work Center**



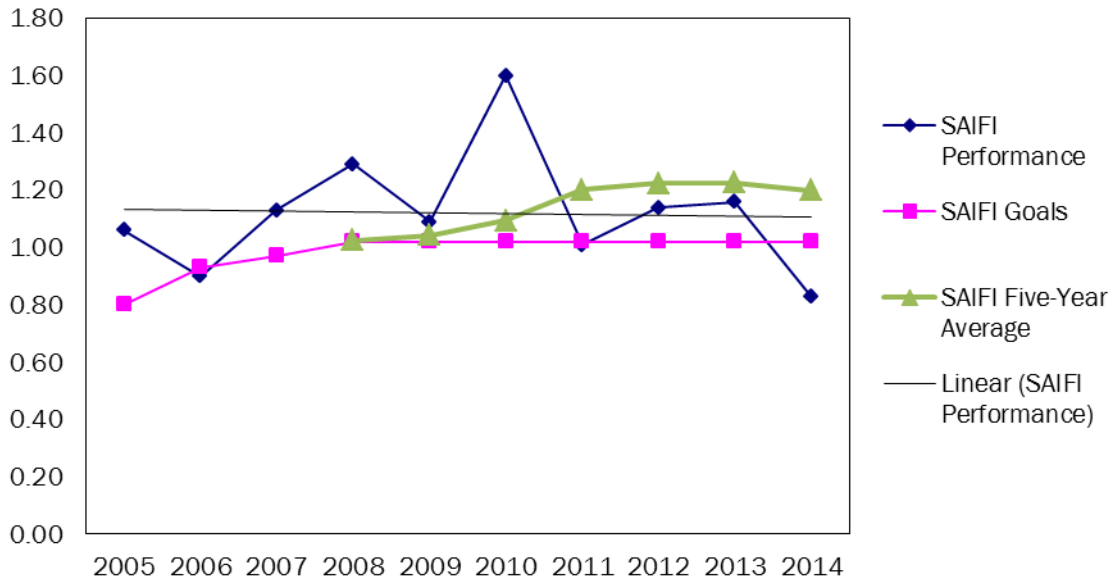
3. *Albert Lea Work Center*

The following graphs depict the past goals and actual performance for the Albert Lea work center.

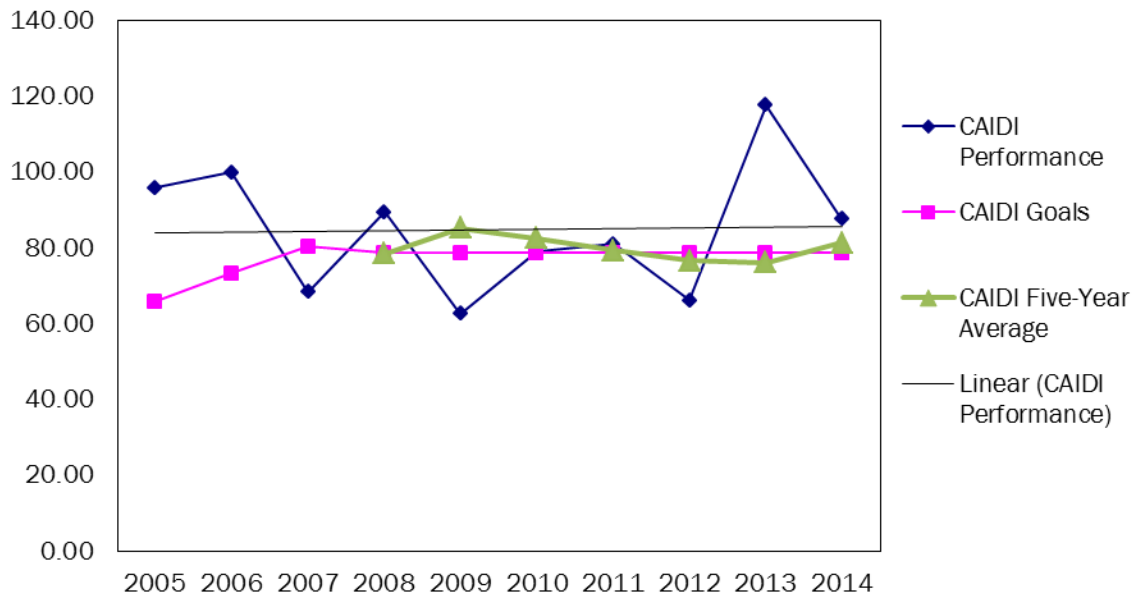
**Graph 4: SAIDI Performance vs. Goals
 Albert Lea Work Center**



**Graph 5: SAIFI Performance vs. Goals
 Albert Lea Work Center**



**Graph 6: CAIDI Performance vs. Goals
 Albert Lea Work Center**



D. ANNUAL SERVICE QUALITY REPORT

Minnesota Rules, part 7826.1300 requires each utility to file the following information:

1. Meter Reading Performance (7826.1400),
2. Involuntary disconnection (7826.1500),
3. Service Extension Response Time (7826.1600),
4. Call Center Response Time (7826.1700),
5. Emergency Medical Accounts (7826.1800),
6. Customer Deposits (7826.1900), and
7. Customer Complaints (7826.2000).

1. Meter Reading Performance

The following information is required for reporting on monthly meter reading performance:

- A. the number and percentage of customer meters read by utility personnel;
- B. the number and percentage of customer meters self-read by customers;
- C. the number and percentage of customer meters that have not been read by utility personnel for periods of 6 to 12 months and for periods of longer than 12 months, and an explanation as to why they have not been read; and
- D. data on monthly meter reading staffing levels by work center or geographical area.

IPL reported that, on average, 90.0 percent of its meters in Minnesota were read monthly in 2014; virtually all of which were read by the Company. Minnesota Rules, part 7826.0900, subp. 1 requires that at least 90 percent of all meters during the months of April through November and at least 80 percent of all meters during the months of December through March be read monthly. The following table summarizes recent meter reading statistics reported by IPL in its annual reports.

Table 10: Average Monthly Meter Reading Statistics

	Meters Read	% Meters Read by Utility	Meters Estimated	Total Meters	Meters Read by Customer	Meters Not Read 6-12 Mos	Meters Not read 12+ Mos	Staffing Level
2010	52,000	96.00%	2,112	54,131	20	24	0	11
2011	50,991	94.50%	2,935	53,940	14	298	18	11
2012	49,811	92.70%	3,932	53,754	10	10	0	11
2013	47,879	89.10%	5,835	53,723	9	21	1	11
2014	48,144	90.00%	5,347	53,499	8	26	3	n/a

As shown in Table 10, the percentage of meters read by IPL has declined each year until 2014. According to IPL's monthly meter reading statistics, the Company did not meet the meter reading standards in the months of January through February and June through August 2014. IPL stated that it missed the 80 percent requirement in January and February due to severe weather and staff availability.

The Company stated that it missed the 90 percent requirement in June through August due to significant staffing issues. Some full-time meter reading employees transferred to other IPL locations, and in light of the pending sale of Minnesota distribution assets,⁷ these positions were not filled with permanent employees. The Company instead hired contract workers who were ultimately unreliable, and several quit with no notice. In September 2014, IPL eliminated all contract employees and hired more reliable temporary workers. IPL also offered overtime work to Customer Care employees and brought in Iowa employees to reduce the number of meter estimates.

The Department appreciates this information and acknowledges IPL's fulfillment of the requirements of Minnesota Rules, part 7826.1400.

2. *Involuntary Disconnections*

The following information is required for reporting on involuntary disconnection of service by calendar month:

- A. the number of customers who received disconnection notices,
- B. the number of customers who sought cold weather rule protection under Chapter 7820 and the number who were granted cold weather rule protection,
- C. the total number of customers whose service was disconnected involuntarily and the number of these customers restored to service within 24 hours, and
- D. the number of disconnected customers restored to service by entering into a payment plan.

The following table summarizes customer disconnection statistics reported by IPL in its annual reports.

⁷ See Sections II.B.3 and II.E. for further discussion.

Table 11: Customer Involuntary Disconnection Information

	Customers Receiving Disconnect Notice	Customers Seeking CWR Protection*	Customers Granted CWR Protection*	% Granted	Customers Disconnected Involuntarily	Customers Restored within 24 Hours	Customers Restored by Entering Payment Plan
2005	32,983	179	172	96%	821	54	5
2006	34,153	642	585	91%	944	16	1
2007	32,215	1,031	1,031	100%	959	18	0
2008	32,757	891	891	100%	630	43	9
2009	36,377	1,555	1,555	100%	604	122	11
2010	37,997	1,976	1,976	100%	509	96	11
2011	42,347	3,772	3,772	100%	490	63	19
2012	39,200	5,328	5,328	100%	511	91	0
2013	39,421	4,307	4,307	100%	273	51	2
2014	44,587	7,100	7,100	100%	566	16	0

*Residential customers only.

The Department notes that Minnesota experienced severe cold in January through March 2014, presumably causing higher customer bills.

The Department acknowledges IPL's fulfillment of the requirements of Minnesota Rules, part 7826.1500.

3. *Service Extension Requests*

The following information is required for reporting on service extension request response times by calendar month:

- A. the number of customers requesting service to a location not previously served by the utility and the intervals between the date service was installed and the later of the in-service date requested by the customer or the date the premises were ready for service; and
- B. the number of customers requesting service to a location previously served by the utility, but not served at the time of the request, and the intervals between the date service was installed and the later of the in-service date requested by the customer or the date the premises were ready for service.

For 2014, IPL reported that 7,086 customers requested service to a location previously served and 469 customers requested service to a location not previously served. The Department looks for any significant trends in overall response times and service requests; none are present in IPL's data. However, the average intervals between request/readiness date and installation date for 2014 declined slightly compared to past performance.

The Department acknowledges IPL's fulfillment of the requirements of Minnesota Rules, part 7826.1600.

4. Call Center Response Time

The annual service quality report must include a detailed report on monthly call center response times, including calls to the business office and calls regarding service interruptions. Further, Minnesota Rules, part 7826.1200 requires that 80 percent of calls be answered within 20 seconds.

IPL reported that 67,626 calls were received in 2014 from Minnesota customers. An average of 84.8 percent of these calls were answered within 20 seconds. IPL also reported that 4,861 of these calls were calls regarding outages. An average of 91.2 percent of these outage calls were answered within 20 seconds.

The following table summarizes IPL's reported call center volume.

Table 12: IPL Call Center Volume

	Outage Calls	Outage Calls Answered within 20 Seconds	Total Calls	Total Calls Answered within 20 Seconds	Outage Calls as a percent of Total Calls
2005	5,607	89%	69,894	84%	8.02%
2006	6,328	93%	64,850	73%	9.76%
2007	6,353	93%	67,225	71%	9.45%
2008	6,046	95%	69,650	75%	8.68%
2009	5,271	98%	65,585	84%	8.04%
2010	7,058	99%	67,168	87%	10.51%
2011	6,186	95%	67,399	85%	9.18%
2012	7,372	92%	63,939	88%	11.53%
2013	6,557	96%	65,133	83%	10.07%
2014	4,861	91%	67,626	85%	7.19%

The Department acknowledges IPL's fulfillment of the requirements of Minnesota Rules, part 7826.1700 and the standard contained in Minnesota Rules, part 7826.1200.

5. Emergency Medical Accounts

The reporting on emergency medical accounts must include the number of customers who requested emergency medical account status under Minnesota Statutes, section 216B.098, subd. 5, the number of applications granted, the number of applications denied, and the reasons for each denial.

IPL reported that seven customers requested and were granted Emergency Medical Account Status in 2014.

The Department acknowledges IPL's fulfillment of the requirements of Minnesota Rules, part 7826.1800.

6. *Customer Deposits*

The reporting on customer deposits must include the number of customers who were required to make a deposit as a condition of receiving service.

The following table summarizes IPL's deposit requirements in recent years.

Table 13: Customer Deposits Required

	Number of Customer Deposits Required
2005	594
2006	402
2007	481
2008	302
2009	336
2010	454
2011	405
2012	434
2013	402
2014	381

The Department acknowledges IPL's fulfillment of the requirements of Minnesota Rules, part 7826.1900.

7. *Customer Complaints*

The reporting on customer complaints must include the following information by customer class and calendar month:

- A. the number of complaints received;
- B. the number and percentage of complaints alleging billing errors, inaccurate metering, wrongful disconnection, high bills, inadequate service, and the number involving service extension intervals, service restoration intervals, and any other identifiable subject matter involved in five percent or more of customer complaints;

- C. the number and percentage of complaints resolved upon initial inquiry, within ten days, and longer than ten days;
- D. the number and percentage of all complaints resolved by taking any of the following actions: (1) taking the action the customer requested, (2) taking an action the customer and the utility agree is an acceptable compromise, (3) providing the customer with information that demonstrates that the situation complained of is not reasonably within the control of the utility, or (4) refusing to take the action the customer requested; and
- E. the number of complaints forwarded to the utility by the Commission’s Consumer Affairs Office for further investigation and action.

IPL reported monthly information showing that a total of 325 customer complaints were received in 2014. The following table summarizes IPL’s customer complaints in recent years.

Table 14: Customer Complaints

	Top Complaint	Second Complaint	% Resolved Upon Initial Inquiry	% Resolved 10+ Days	% Resolved Taking Action Requested	Complaints Forwarded by the CAO
2009	Inaccurate Metering	Billing Errors	41%	12%	59%	10
2010	Property Damage	Payment Status	34%	6%	60%	4
2011	General	Property Damage	21%	10%	59%	4
2012	Property Damage	Payment Status	23%	7%	56%	3
2013	Property Damage	Tree Trimming	22%	12%	55%	2
2014	Meter Reading	Property Damage	19%	13%	53%	3

Consistent with the discussion in Section II.D.1. regarding IPL’s struggles with meter reading performance, “meter reading” was the top customer complaint in 2014. The Department requests that IPL provide discussion in its Reply Comments regarding the Company’s plan to transfer meter reading data to SMEC in contemplation of the sale and transfer of assets discussed in Section II.B.3.

Property damage has been one of the top two customer complaints since 2010. In its 2014 Annual Report docket, IPL provided additional discussion in its Reply Comments regarding why property damage claims have appeared more prevalent in recent history.⁸ The Department concluded that IPL provided a reasonable discussion.⁹ In addition, the amounts paid annually for Property Damage Reimbursement, shown in Table 1 above, do not appear to indicate a systematic property damage issue.

The Department notes that it appears that some data is missing from the complaints detail provided in IPL's 2015 Annual Report. The Company reported 325 total complaints, while the complaints detailed by category sum to 312. Specifically, the detail related to the Payment Arrangement, Power Quality, Customer Payment Programs, and Non-Utility Billing categories seem to be missing. The complaints reported in these categories are less than five percent of total complaints so is not technically required to be reported under Minnesota Rules, part 7826.2000 B. However, the discrepancy may affect the accuracy of the numbers and percentages reported under Minnesota Rules, part 7826.2000 A, C, and D. Therefore, the Department requests that the missing customer complaint detail be provided in IPL's Reply Comments.

The Department acknowledges IPL's fulfillment of the requirements of Minnesota Rules, part 7826.2000.

E. PENDING SALE OF IPL ASSETS

On April 30, 2015, the Commission approved the sale of IPL's Minnesota electric distribution system and assets, and transfer of service rights and obligations in Minnesota, to Southern Minnesota Energy Cooperative (SMEC), an association of twelve electric cooperatives created for the purposes of purchasing and operating IPL's Minnesota electric operations.¹⁰

The Department recommends that IPL file an informational report containing its 2015 service quality data as a compliance filing in this docket by the earlier of (i) 90 days after closing the transaction to sell its electric assets to SMEC or (ii) April 1, 2016. The report should include all information routinely reported as part of the annual electric service quality reports and cover the period from January 1, 2015 through the close of the transaction to sell the IPL electric assets.

⁸ IPL's Reply Comments filed July 21, 2014 in Docket No. E001/M-14-282.

⁹ The Department's Response Comments filed September 8, 2014 in Docket No. E001/M-14-282.

¹⁰ Docket No. E115,E140,E105,E139,E124,E145,E001,E132,E114,E6521,E142,E135/PA-14-322.

III. RECOMMENDATIONS

The Department recommends that the Commission accept IPL's filing in fulfillment of the requirements of Minnesota Rules, Chapter 7826, pending the submission of additional information.

The Department requests that IPL provide in reply comments:

- discussion on IPL's plan to transfer meter reading data to SMEC in contemplation of the sale and transfer of assets to SMEC; and
- complete customer complaint detail.

The Department also recommends that IPL file an informational report containing its 2015 service quality data as a compliance filing in this docket by the earlier of (i) 90 days after closing the transaction to sell its electric assets to SMEC or (ii) April 1, 2016. The report should include all information routinely reported as part of the annual electric service quality reports and shall cover the period from January 1, 2015 through the close of the transaction to sell the IPL electric assets.

/ja

CHAPTER 7826
PUBLIC UTILITIES COMMISSION
ELECTRIC UTILITY STANDARDS

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- 7826.0200 DEFINITIONS.

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7826.0100 APPLICABILITY.

This chapter applies to all persons, corporations, or other legal entities engaged in the retail distribution of electric service to the public, with the following exceptions:

- A. cooperative electric associations;
- B. municipal utilities;
- C. persons distributing electricity only to tenants or cooperative or condominium owners in buildings owned, leased, or operated by those persons;
- D. persons distributing electricity only to occupants of a manufactured home or trailer park owned, leased, or operated by those persons; and
- E. persons distributing electricity to fewer than 25 persons.

Statutory Authority: *MS s 216B.81*

History: *27 SR 1174*

Published Electronically: *February 13, 2003*

7826.0200 DEFINITIONS.

Subpart 1. **Scope.** The terms used in this chapter have the meanings given them in this part.

Subp. 2. **Bulk power supply facility.** "Bulk power supply facility" means the interconnected system that encompasses the electric generation resource, transmission lines, transmission substations, and associated equipment that, upon a total, simultaneous, and sustained interruption, disrupts service to all distribution feeders exiting that substation when those distribution feeders do not have service restoration interconnections with alternate sources.

Subp. 3. **Cold weather rule.** "Cold weather rule" means the set of protections against disconnection during the heating season set forth in Minnesota Statutes, sections 216B.096 and 216B.097.

Subp. 4. **Customer average interruption duration index or CAIDI.** "Customer average interruption duration index" or "CAIDI" means the average customer-minutes of interruption per customer interruption. It approximates the average length of time required to complete service restoration. It is determined by dividing the annual sum of all customer-minutes of interruption durations by the annual number of customer interruptions, using storm-normalized data.

Subp. 5. **Customer complaint.** "Customer complaint" means any call center communication by a utility customer in which the customer states a grievance related to the utility's provision of service to that customer.

Subp. 6. **Interruption.** "Interruption" means an interruption of service to a customer with a duration greater than five minutes.

Subp. 7. **Major service interruption.** "Major service interruption" means an interruption of service at the feeder level or above and affecting 500 or more customers for one or more hours.

Subp. 8. **Resolved.** "Resolved," used in regard to customer complaints, means that the utility has examined the complainant's claims, conducted any necessary investigation, and done one of the following:

- A. taken the action the customer requests;
- B. taken an action the customer and the utility agree is an acceptable compromise;
- C. provided the customer with information that demonstrates that the situation complained of is not reasonably within the control of the utility; or
- D. refused to take the action the customer requested and communicated that refusal to the customer.

Subp. 9. **Storm-normalized data.** "Storm-normalized data" means data that has been adjusted to neutralize the effects of outages due to major storms.

Subp. 10. **System average interruption duration index or SAIDI.** "System average interruption duration index" or "SAIDI" means the average customer-minutes of interruption per customer. It is determined by dividing the annual sum of customer-minutes of interruption by the average number of customers served during the year, using storm-normalized data.

Subp. 11. **System average interruption frequency index or SAIFI.** "System average interruption frequency index" or "SAIFI" means the average number of interruptions per customer per year. It is determined by dividing the total annual number of customer interruptions by the average number of customers served during the year, using storm-normalized data.

Subp. 12. **Utility.** "Utility" means any person, corporation, or other legal entity engaged in the retail distribution of electric service to the public, with the following exceptions:

- A. cooperative electric associations;
- B. municipal utilities;
- C. persons distributing electricity only to tenants or cooperative or condominium owners in buildings owned, leased, or operated by those persons;
- D. persons distributing electricity only to occupants of a manufactured home or trailer park owned, leased, or operated by those persons; and
- E. persons distributing electricity to fewer than 25 persons.

Subp. 13. **Work center.** "Work center" means a portion of a utility's assigned service area that it treats as an administrative subdivision for purposes of maintaining and repairing its distribution system.

Statutory Authority: *MS s 216B.81*

History: *27 SR 1174; L 2009 c 110 s 37*

Published Electronically: *June 2, 2009*

SAFETY

7826.0300 SAFETY STANDARDS.

Subpart 1. **National Electrical Safety Code.** When constructing new facilities or reinvesting capital in existing facilities, utilities shall comply with the requirements stated at the time the work is done in the then most recently published edition of the National Electrical Safety Code, as published by the Institute of Electrical and Electronics Engineers, Inc. and approved by the American National Standards Institute. This code is incorporated by reference, is not subject to frequent change, and is conveniently available to the public through the statewide interlibrary loan system.

Subp. 2. **Standards and recommended practices of the Institute of Electrical and Electronics Engineers, Inc. and the American National Standards Institute.** Utilities are encouraged to follow the recommended practices of the Institute of Electrical and Electronics Engineers, Inc. and the American National Standards Institute on electricity metering and standard voltage ratings for electric power systems and equipment. Utility compliance with these recommended practices creates a rebuttable presumption that a practice is reasonable.

Subp. 3. **Occupational Safety and Health Administration rules.** When constructing, installing, refurbishing, or maintaining facilities, utilities shall comply with all regulations promulgated by the United States Occupational Safety and Health Administration and by the Occupational Safety and Health Division of the Minnesota Department of Labor and Industry.

Statutory Authority: *MS s 216B.81*

History: *27 SR 1174*

Published Electronically: *February 13, 2003*

7826.0400 ANNUAL SAFETY REPORT.

On or before April 1 of each year, each utility shall file a report on its safety performance during the last calendar year. This report shall include at least the following information:

A. summaries of all reports filed with the United States Occupational Safety and Health Administration and the Occupational Safety and Health Division of the Minnesota Department of Labor and Industry during the calendar year; and

B. a description of all incidents during the calendar year in which an injury requiring medical attention or property damage resulting in compensation occurred as a result of downed wires or other electrical system failures and all remedial action taken as a result of any injuries or property damage described.

Statutory Authority: *MS s 216B.81*

History: *27 SR 1174*

Published Electronically: *February 13, 2003*

RELIABILITY

7826.0500 RELIABILITY REPORTING REQUIREMENTS.

Subpart 1. **Annual reporting requirements.** On or before April 1 of each year, each utility shall file a report on its reliability performance during the last calendar year. This report shall include at least the following information:

A. the utility's SAIDI for the calendar year, by work center and for its assigned service area as a whole;

B. the utility's SAIFI for the calendar year, by work center and for its assigned service area as a whole;

C. the utility's CAIDI for the calendar year, by work center and for its assigned service area as a whole;

D. an explanation of how the utility normalizes its reliability data to account for major storms;

E. an action plan for remedying any failure to comply with the reliability standards set forth in part 7826.0600 or an explanation as to why noncompliance was unavoidable under the circumstances;

F. to the extent feasible, a report on each interruption of a bulk power supply facility during the calendar year, including the reasons for interruption, duration of interruption, and any remedial steps that have been taken or will be taken to prevent future interruption;

G. a copy of each report filed under part 7826.0700;

H. to the extent technically feasible, circuit interruption data, including identifying the worst performing circuit in each work center, stating the criteria the utility used to identify the worst performing

circuit, stating the circuit's SAIDI, SAIFI, and CAIDI, explaining the reasons that the circuit's performance is in last place, and describing any operational changes the utility has made, is considering, or intends to make to improve its performance;

I. data on all known instances in which nominal electric service voltages on the utility's side of the meter did not meet the standards of the American National Standards Institute for nominal system voltages greater or less than voltage range B;

J. data on staffing levels at each work center, including the number of full-time equivalent positions held by field employees responsible for responding to trouble and for the operation and maintenance of distribution lines; and

K. any other information the utility considers relevant in evaluating its reliability performance over the calendar year.

Subp. 2. **Initial reporting requirements.** By March 30, 2003, each utility shall file its SAIDI, SAIFI, and CAIDI for each of the past five calendar years, by work center and for its assigned service area as a whole. If this information is not available, the utility shall file an explanation of how it has been tracking reliability for the past five years, together with reliability data for that period of time. If the utility has implemented a new reliability tracking system that makes comparisons between historical data and current data unreliable, the utility shall explain this situation in its filing.

Statutory Authority: *MS s 216B.81*

History: *27 SR 1174*

Published Electronically: *February 13, 2003*

7826.0600 RELIABILITY STANDARDS.

Subpart 1. **Annually proposed individual reliability standards.** On or before April 1 of each year, each utility shall file proposed reliability performance standards in the form of proposed numerical values for the SAIDI, SAIFI, and CAIDI for each of its work centers. These filings shall be treated as "miscellaneous tariff filings" under the commission's rules of practice and procedure, part 7829.0100, subpart 11.

Subp. 2. **Annually set, utility-specific, reliability standards.** The commission shall set reliability performance standards annually for each utility in the form of numerical values for the SAIDI, SAIFI, and CAIDI for each of its work centers. These standards remain in effect until the commission takes final action on a filing proposing new standards or changes them in another proceeding.

Statutory Authority: *MS s 216B.81*

History: *27 SR 1174*

Published Electronically: *February 13, 2003*

7826.0700 REPORTING MAJOR SERVICE INTERRUPTIONS.

Subpart 1. **Contemporaneous reporting.** A utility shall promptly inform the commission's Consumer Affairs Office of any major service interruption. At that time, the utility shall provide the following information, to the extent known:

- A. the location and cause of the interruption;
- B. the number of customers affected;

- C. the expected duration of the interruption; and
- D. the utility's best estimate of when service will be restored, by geographical area.

Subp. 2. **Written report.** Within 30 days, a utility shall file a written report on any major service interruption in which ten percent or more of its Minnesota customers were out of service for 24 hours or more. This report must include at least a description of:

- A. the steps the utility took to restore service; and
- B. any operational changes the utility has made, is considering, or intends to make, to prevent similar interruptions in the future or to restore service more quickly in the future.

Statutory Authority: *MS s 216B.81*

History: *27 SR 1174*

Published Electronically: *February 13, 2003*

SERVICE

7826.0800 CUSTOMER NOTICE OF PLANNED SERVICE INTERRUPTIONS.

Utilities shall give customers the most effective actual notice possible of any planned service interruption expected to last longer than 20 minutes. For any planned interruption expected to exceed four hours, the utility shall provide, if feasible, mailed notice one week in advance and notice by telephone or door-to-door household visits 12 to 72 hours before the interruption. Planned service interruptions must be scheduled at times to minimize the inconvenience to customers. When planned service interruptions exceeding four hours are canceled, utilities shall notify, if feasible, the customers who received notice that service would be interrupted.

Statutory Authority: *MS s 216B.81*

History: *27 SR 1174*

Published Electronically: *February 13, 2003*

7826.0900 METER READING FREQUENCY; CUSTOMER ACCOMMODATION.

Subpart 1. **Meter reading performance standard.** Utilities shall attempt to read all meters on a monthly basis unless otherwise authorized by the commission. Utilities are assumed to be in compliance with this standard if they read at least 90 percent of all meters during the months of April through November and at least 80 percent of all meters during the months of December through March. Utilities shall contact any customer whose bill has been estimated for two consecutive months and attempt to schedule a meter reading.

Subp. 2. **Evening and weekend meter reading.** Utilities shall read meters during the evening or on Saturday or Sunday for customers whose meters are inaccessible and whose work or other schedule makes meter reading during regular business hours a hardship. When a utility contacts a customer on an individual basis to schedule a meter reading, the utility shall inform the customer of the available alternatives that the utility provides, such as the customer's option to provide a self-read. If alternative arrangements are not acceptable to the customer, the utility shall inform the customer that the utility provides evening and weekend meter reading for customers whose work schedule or other schedule makes meter reading during regular business hours a hardship.

Statutory Authority: *MS s 216B.81*

History: *27 SR 1174*

Published Electronically: *February 13, 2003*

7826.1000 REPLACING MALFUNCTIONING METERS.

Utilities shall replace a malfunctioning meter within ten calendar days of receiving a report from a customer questioning its accuracy or within ten calendar days of learning in some other way that it may be inaccurate.

Statutory Authority: *MS s 216B.81*

History: *27 SR 1174*

Published Electronically: *February 13, 2003*

7826.1100 KEEPING SERVICE CALLS.

Utilities shall keep service call appointments and shall provide as much notice as possible when an appointment cannot be kept. A service call appointment is kept if the worker arrives within a four-hour period set by the utility and clearly communicated to the customer.

Statutory Authority: *MS s 216B.81*

History: *27 SR 1174*

Published Electronically: *February 13, 2003*

7826.1200 CALL CENTER RESPONSE TIME.

Subpart 1. **Calls to business office.** On an annual basis, utilities shall answer 80 percent of calls made to the business office during regular business hours within 20 seconds. "Answer" means that an operator or representative is ready to render assistance or accept the information to handle the call. Acknowledging that the customer is waiting on the line and will be served in turn is not an answer. If the utility uses an automated call-processing system, the 20-second period begins when the customer has selected a menu option to speak to a live operator or representative. Utilities using automatic call-processing systems must provide that option, and they must not delay connecting the caller to a live operator or representative for purposes of playing promotional announcements.

Subp. 2. **Calls regarding service interruptions.** On an annual basis, utilities shall answer 80 percent of calls directed to the telephone number for reporting service interruptions within 20 seconds. "Answer" may mean connecting the caller to a recording providing, to the extent practicable, at least the following information:

- A. the number of customers affected by the interruption;
- B. the cause of the interruption;
- C. the location of the interruption; and
- D. the utility's best estimate of when service will be restored, by geographical area.

Statutory Authority: *MS s 216B.81*

History: *27 SR 1174*

Published Electronically: *February 13, 2003*

7826.1300 ANNUAL SERVICE QUALITY REPORT FILING.

On or before April 1 of each year, each utility shall file a report on its service quality performance during the last calendar year. These filings must be treated as "miscellaneous tariff filings" under the commission's rules of practice and procedure, part 7829.0100, subpart 11. This report must include at least the information set forth in parts 7826.1400 to 7826.2000.

Statutory Authority: *MS s 216B.81*

History: *27 SR 1174*

Published Electronically: *February 13, 2003*

REPORTING

7826.1400 REPORTING METER-READING PERFORMANCE.

The annual service quality report must include a detailed report on the utility's meter-reading performance, including, for each customer class and for each calendar month:

- A. the number and percentage of customer meters read by utility personnel;
- B. the number and percentage of customer meters self-read by customers;
- C. the number and percentage of customer meters that have not been read by utility personnel for periods of six to 12 months and for periods of longer than 12 months, and an explanation as to why they have not been read; and
- D. data on monthly meter-reading staffing levels, by work center or geographical area.

Statutory Authority: *MS s 216B.81*

History: *27 SR 1174*

Published Electronically: *February 13, 2003*

7826.1500 REPORTING INVOLUNTARY DISCONNECTIONS.

The annual service quality report must include a detailed report on involuntary disconnections of service, including, for each customer class and each calendar month:

- A. the number of customers who received disconnection notices;
- B. the number of customers who sought cold weather rule protection under Minnesota Statutes, sections 216B.096 and 216B.097, and the number who were granted cold weather rule protection;
- C. the total number of customers whose service was disconnected involuntarily and the number of these customers restored to service within 24 hours; and
- D. the number of disconnected customers restored to service by entering into a payment plan.

Statutory Authority: *MS s 216B.81*

History: *27 SR 1174; L 2009 c 110 s 37*

Published Electronically: *June 2, 2009*

7826.1600 REPORTING SERVICE EXTENSION REQUEST RESPONSE TIMES.

The annual service quality report must include a report on service extension request response times, including, for each customer class and each calendar month:

A. the number of customers requesting service to a location not previously served by the utility and the intervals between the date service was installed and the later of the in-service date requested by the customer or the date the premises were ready for service; and

B. the number of customers requesting service to a location previously served by the utility, but not served at the time of the request, and the intervals between the date service was installed and the later of the in-service date requested by the customer or the date the premises were ready for service.

Statutory Authority: *MS s 216B.81*

History: *27 SR 1174*

Published Electronically: *February 13, 2003*

7826.1700 REPORTING CALL CENTER RESPONSE TIMES.

The annual service quality report must include a detailed report on call center response times, including calls to the business office and calls regarding service interruptions. The report must include a month-by-month breakdown of this information.

Statutory Authority: *MS s 216B.81*

History: *27 SR 1174*

Published Electronically: *February 13, 2003*

7826.1800 REPORTING EMERGENCY MEDICAL ACCOUNT STATUS.

The annual service quality report must include the number of customers who requested emergency medical account status under Minnesota Statutes, section 216B.098, subdivision 5, the number whose applications were granted, and the number whose applications were denied and the reasons for each denial.

Statutory Authority: *MS s 216B.81*

History: *27 SR 1174*

Published Electronically: *February 13, 2003*

7826.1900 REPORTING CUSTOMER DEPOSITS.

The annual service quality report must include the number of customers who were required to make a deposit as a condition of receiving service.

Statutory Authority: *MS s 216B.81*

History: *27 SR 1174*

Published Electronically: *February 13, 2003*

7826.2000 REPORTING CUSTOMER COMPLAINTS.

The annual service quality report must include a detailed report on complaints by customer class and calendar month, including at least the following information:

- A. the number of complaints received;
- B. the number and percentage of complaints alleging billing errors, inaccurate metering, wrongful disconnection, high bills, inadequate service, and the number involving service-extension intervals, service-restoration intervals, and any other identifiable subject matter involved in five percent or more of customer complaints;
- C. the number and percentage of complaints resolved upon initial inquiry, within ten days, and longer than ten days;
- D. the number and percentage of all complaints resolved by taking any of the following actions:
 - (1) taking the action the customer requested;
 - (2) taking an action the customer and the utility agree is an acceptable compromise;
 - (3) providing the customer with information that demonstrates that the situation complained of is not reasonably within the control of the utility; or
 - (4) refusing to take the action the customer requested; and
- E. the number of complaints forwarded to the utility by the commission's Consumer Affairs Office for further investigation and action.

Statutory Authority: *MS s 216B.81*

History: *27 SR 1174*

Published Electronically: *February 13, 2003*

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. E001/M-15-317

Dated this 1st day of June 2015

/s/Sharon Ferguson

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