

August 10, 2018

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

RE: **Comments of the Minnesota Department of Commerce, Division of Energy Resources**
Docket Nos. E002/M-15-111, E017/M-15-112, and E015/M-15-120

Dear Mr. Wolf,

On June 11, 2018, the Minnesota Public Utilities Commission (Commission) issued a *Notice of Comment Period – Request for Tariff Revision and Annual Compliance Filings* in the above-referenced dockets. Attached are comments of the Minnesota Department of Commerce, Division of Energy Resources (Department) in this matter.

The Department is available to answer any questions the Commission may have.

Sincerely,

/s/ SUSAN L. PEIRCE
Rate Analyst Coordinator

SLP/jl
Attachment

Before the Minnesota Public Utilities Commission

Comments of the Minnesota Department of Commerce Division of Energy Resources

Docket No. E002/M-15-111, E017/M-15-112, and E015/M-15-120

I. BACKGROUND INFORMATION

The 2014 Legislature passed Minn. Stat. §216B.1614 (the EV Statute) requiring each electric investor-owned utility (IOU) to file an Electric Vehicle tariff (EV tariff) for the purchase of electricity for recharging electric vehicles. The statute applies to Minnesota Power (MP), Xcel Energy (Xcel), and Otter Tail Power Company (OTP).

On June 22, 2015, the Minnesota Public Utilities Commission (Commission) issued an *Order Approving Tariffs and Requiring Filings* in which it set out compliance filing requirements.¹ Specifically, the Commission required each of the utilities to include the information set forth in Minn. Stat. §216B.1614, Subd. 3(1) and (2), and the following information on a per-quarter basis:

- a. The amount of energy sold in on- and off-peak periods, if applicable;
- b. A brief description of all development and promotion activities and their costs;
- c. The number of customers choosing the renewable-source option;
- d. The status of the communication costs tracker account, if applicable; and,
- e. Copies of any EV promotional materials distributed to customers.

In its October 26, 2017 *Order Accepting 2017 Annual Reports and Establishing Requirements for Next Annual Reports*, the Commission set forth additional requirements, as follows:
Minnesota Power:

Minnesota Power shall include in its next annual report an evaluation of options to reduce the upfront cost burden for customers looking to opt into the EV tariff, including but not limited to a discussion of sub-metering technologies available. Minnesota

¹ *In the Matter of Northern States Power Company d/b/a Xcel Energy's Petition for Approval of a Residential Electric Vehicle Charging Tariff*, Docket No. E002/M-15-111; *In the Matter of Otter Tail Power Company's Request for Approval of its Off-Peak Electric Vehicle Rider*, Docket No. E017/M-15-112; *In the Matter of Minnesota Power's Petition for Approval of a Residential Off-Peak Electric Vehicle Services Tariff*, Docket No. E015/M-15-120, Order Approving Tariffs and Requiring Filings, June 22, 2015.

Power shall also include a timeline for filing a proposed pilot program or implementation of any other feasible option.

Otter Tail Power:

Otter Tail Power shall meet the following additional requirements as part of its next annual report:

- A. Submit monthly usage data;
- B. Discuss the feasibility of a sub-metering pilot proposal and options and feasibility of implementing a sub-metering pilot program proposal; and
- C. Analyze whether to continue recovering promotional costs from only EV customers or whether those costs could be recovered through some other mechanism.

Otter Tail Power shall remove the 1.336¢/kWh rate adder for promotional activities from the electric vehicle tariff effective as of the issue date of this order.

Xcel Energy

Xcel shall file in next year's annual report a compliance report with correction of data anomalies within 30 days and an assessment of current and forecasted EV penetration in Xcel's service territory, including an analysis of current and forecasted tariffs in use and charging practices.

On June 1, 2018, the three utilities subject to the EV Statute filed annual reports on their EV tariffs.

II. DEPARTMENT ANALYSIS

The Minnesota Department of Commerce, Division of Energy Resources (Department) has reviewed the compliance filings for all three utilities and concludes that they comply with the Commission's Order.

In addition to seeking acceptance of its annual compliance filing, Minnesota Power requested approval of revisions to its Residential EV tariff as discussed below.

A. MINNESOTA POWER

MP currently has 2 customers on its EV tariff. For the period May 2017 through April 2018 a total of 7,292 kWh was sold under the EV tariff. MP provides customer outreach on its EV tariff through a variety of activities, the largest one being the Arrowhead Home and Builder Show. In total, MP spent \$1,665 on promotional activities, not including the labor, materials used for advertisements that it designed and printed in-house.

MP's current EV tariff requires customers to install a second meter specific to their EV service. MP's filing discussed a number of sub-metering options that would eliminate the need for a second meter. The Company stated that its preferred option is to implement a Meter Data Management system following full deployment of its AMI network. As to timeline, AMI deployment is approaching 50% for the MP's system, and AMI network coverage is at 95%. MP is evaluating vendor responses to its Request for Proposals for MDM deployment.

As noted above, MP proposed changes to its Residential EV tariff. Under MP's current tariff, service is only available and the line energized during off-peak periods between 11 pm and 7 am daily. Customers have reported difficulty in the effectiveness of their chargers when they have been without power for a period of time, as well as insufficient time for fully charging their vehicles, especially during the winter. As a result of these difficulties, MP proposed to change its tariff to permit charging at all times with separate on-peak and off-peak rates. In addition, the Company proposed to align its on- and off-peak periods with its current Residential Time-of-Day tariff. On-Peak periods would be from 8 am to 10 pm Monday through Friday, excluding holidays. Off-peak periods would be during all remaining hours, and nationally designated holidays.

MP calculated its proposed on- and off-peak energy charges using the weighted average energy charge under its current residential block rate structure, and the on- and off-peak energy charge adjustment amounts from its Residential Time-of-Day tariff. MP proposed an on-peak energy charge of \$0.11763 and an off-peak energy charge of \$0.03903 per kWh. In comparison, the existing energy charge is \$0.0433 per kWh during the off-peak period of 11 pm to 7 am.

The Department has reviewed MP's proposed tariff changes and recommends approval.

B. OTTER TAIL POWER

As of April 2018, OTP had 5 customers on its Off-Peak EV Rider. OTP submitted the information required by the Commission's Order including customer enrollment, energy usage and copies of its promotional materials.

OTP indicated that while it is interested in a sub-metering program, it does not believe implementing such a program is feasible at this time. The Company stated that given its more rural service territory it believes investing in public charging stations is a better investment of resources that may expand EV penetration in its territory. OTP indicated that it has partnered with communities to install seven level two chargers with additional installations being planned.

Finally, OTP stated that it does not plan to recover promotional costs from only EV customers, nor propose a different recovery mechanism, but will continue to consider this question going forward.

C. XCEL

As of April 2018, Xcel had 211 customers on its EV Tariff with total energy usage of 73,702 kWh. Off-peak usage is currently between 9 pm and 9 am, and accounts for 92 percent of the monthly average usage. Xcel offers customers the option of participating in its green pricing programs along with its EV tariff. The Company indicated that as of April 2018, 23 EV customers participated in Windsource, and one customer participated in its Renewable*Connect program.

Xcel provided information on its promotional and educational activities surrounding EV's, including information to auto dealers, outreach at a number of public events including the Twin Cities Auto Show, and information provided on its website. In total, educational and outreach costs total \$132,225 for the period May 1, 2017 through April 30, 2018.

Xcel provided an assessment of current and forecasted EV penetration in Xcel's service territory, concluding that it expects to see approximately 40,000 EVs in Xcel's Minnesota service territory by 2023. Xcel provided an analysis of current and forecasted tariffs in use and charging practices. See Attachment A of Xcel's report for a full discussion.

III. DEPARTMENT RECOMMENDATIONS

The Department recommends that the Commission accept the Annual Electric Vehicle Reports submitted by Minnesota Power, Otter Power Company, and Xcel Energy.

The Department also recommends that the Commission approve Minnesota Power's proposed changes to its EV Tariff.

CERTIFICATE OF SERVICE

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

MINNESOTA DEPARTMENT OF COMMERCE – COMMENTS

Docket Nos. **E002/M-15-111, E017/M-15-112, E015/M-15-120**

Dated this **9th** day of **August, 2018**.

/s/Marcella Emeott

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Christopher	Anderson	canderson@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022191	Electronic Service	No	OFF_SL_15-111_Official
Alison C	Archer	aarcher@misoenergy.org	MISO	2985 Ames Crossing Rd Eagan, MN 55121	Electronic Service	No	OFF_SL_15-111_Official
James J.	Bertrand	james.bertrand@stinson.com	Stinson Leonard Street LLP	50 S 6th St Ste 2600 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_15-111_Official
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1800 St. Paul, MN 55101	Electronic Service	No	OFF_SL_15-111_Official
Carl	Cronin	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_15-111_Official
Leigh	Currie	lcurrie@mncenter.org	Minnesota Center for Environmental Advocacy	26 E. Exchange St., Suite 206 St. Paul, Minnesota 55101	Electronic Service	No	OFF_SL_15-111_Official
Ian	Dobson	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012130	Electronic Service	No	OFF_SL_15-111_Official
John	Farrell	jfarrell@ilsr.org	Institute for Local Self-Reliance	1313 5th St SE #303 Minneapolis, MN 55414	Electronic Service	No	OFF_SL_15-111_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_15-111_Official
Kimberly	Hellwig	kimberly.hellwig@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_15-111_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Michael	Hoppe	ih23@mtn.org	Local Union 23, I.B.E.W.	932 Payne Avenue St. Paul, MN 55130	Electronic Service	No	OFF_SL_15-111_Official
Alan	Jenkins	aj@jenkinsatlaw.com	Jenkins at Law	2265 Roswell Road Suite 100 Marietta, GA 30062	Electronic Service	No	OFF_SL_15-111_Official
Richard	Johnson	Rick.Johnson@lawmoss.com	Moss & Barnett	150 S. 5th Street Suite 1200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_15-111_Official
Mark J.	Kaufman	mkaufman@ibewlocal949.org	IBEW Local Union 949	12908 Nicollet Avenue South Burnsville, MN 55337	Electronic Service	No	OFF_SL_15-111_Official
Thomas	Koehler	TGK@IBEW160.org	Local Union #160, IBEW	2909 Anthony Ln St Anthony Village, MN 55418-3238	Electronic Service	No	OFF_SL_15-111_Official
Michael	Krikava	mkrikava@briggs.com	Briggs And Morgan, P.A.	2200 IDS Center 80 S 8th St Minneapolis, MN 55402	Electronic Service	No	OFF_SL_15-111_Official
Douglas	Larson	dlarson@dakotaelectric.com	Dakota Electric Association	4300 220th St W Farmington, MN 55024	Electronic Service	No	OFF_SL_15-111_Official
Ryan	Long	ryan.j.long@xcelenergy.com	Xcel Energy	414 Nicollet Mall 401 8th Floor Minneapolis, MN 55401	Electronic Service	No	OFF_SL_15-111_Official
Pam	Marshall	pam@energycents.org	Energy CENTS Coalition	823 7th St E St. Paul, MN 55106	Electronic Service	No	OFF_SL_15-111_Official
Kevin	Miller	kevin.miller@chargepoint.com	ChargePoint, Inc.	254 E. Hacienda Avenue Campbell, California 95008	Electronic Service	No	OFF_SL_15-111_Official

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_15-111_Official
David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency	220 South Sixth Street Suite 1300 Minneapolis, Minnesota 55402	Electronic Service	No	OFF_SL_15-111_Official
Michael	Noble	noble@fresh-energy.org	Fresh Energy	Hamm Bldg., Suite 220 408 St. Peter Street St. Paul, MN 55102	Electronic Service	No	OFF_SL_15-111_Official
Richard	Savelkoul	rsavelkoul@martinsquires.com	Martin & Squires, P.A.	332 Minnesota Street Ste W2750 St. Paul, MN 55101	Electronic Service	No	OFF_SL_15-111_Official
Anne	Smart	anne.smart@chargepoint.com	ChargePoint, Inc.	254 E Hacienda Ave Campbell, CA 95008	Electronic Service	No	OFF_SL_15-111_Official
Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.	76 W Kellogg Blvd St. Paul, MN 55102	Electronic Service	No	OFF_SL_15-111_Official
Byron E.	Starns	byron.starns@stinson.com	Stinson Leonard Street LLP	50 S 6th St Ste 2600 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_15-111_Official
James M.	Strommen	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered	470 U.S. Bank Plaza 200 South Sixth Street Minneapolis, MN 55402	Electronic Service	No	OFF_SL_15-111_Official
Eric	Swanson	eswanson@winthrop.com	Winthrop & Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_15-111_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Andrew	Twite	twite@fresh-energy.org	Fresh Energy	408 St. Peter Street, Ste. 220 St. Paul, MN 55102	Electronic Service	No	OFF_SL_15-111_Official
Lisa	Veith	lisa.veith@ci.stpaul.mn.us	City of St. Paul	400 City Hall and Courthouse 15 West Kellogg Blvd. St. Paul, MN 55102	Electronic Service	No	OFF_SL_15-111_Official
Daniel P	Wolf	dan.wolf@state.mn.us	Public Utilities Commission	121 7th Place East Suite 350 St. Paul, MN 551012147	Electronic Service	No	OFF_SL_15-111_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Christopher	Anderson	canderson@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022191	Electronic Service	No	OFF_SL_15-112_Official
Ray	Choquette	rchoquette@agp.com	Ag Processing Inc.	12700 West Dodge Road PO Box 2047 Omaha, NE 68103-2047	Electronic Service	No	OFF_SL_15-112_Official
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1800 St. Paul, MN 55101	Electronic Service	No	OFF_SL_15-112_Official
Leigh	Currie	lcurrie@mncenter.org	Minnesota Center for Environmental Advocacy	26 E. Exchange St., Suite 206 St. Paul, Minnesota 55101	Electronic Service	No	OFF_SL_15-112_Official
Ian	Dobson	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012130	Electronic Service	No	OFF_SL_15-112_Official
James C.	Erickson	jericksonkbc@gmail.com	Kelly Bay Consulting	17 Quechee St Superior, WI 54880-4421	Electronic Service	No	OFF_SL_15-112_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_15-112_Official
Bruce	Gerhardson	bgerhardson@otpc.com	Otter Tail Power Company	PO Box 496 215 S Cascade St Fergus Falls, MN 565380496	Electronic Service	No	OFF_SL_15-112_Official
Kimberly	Hellwig	kimberly.hellwig@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_15-112_Official
Shane	Henriksen	shane.henriksen@enbridge.com	Enbridge Energy Company, Inc.	1409 Hammond Ave FL 2 Superior, WI 54880	Electronic Service	No	OFF_SL_15-112_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
James D.	Larson	james.larson@avantenergy.com	Avant Energy Services	220 S 6th St Ste 1300 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_15-112_Official
Douglas	Larson	dlarson@dakotaelectric.com	Dakota Electric Association	4300 220th St W Farmington, MN 55024	Electronic Service	No	OFF_SL_15-112_Official
Kavita	Maini	kmairi@wi.rr.com	KM Energy Consulting LLC	961 N Lost Woods Rd Oconomowoc, WI 53066	Electronic Service	No	OFF_SL_15-112_Official
Kevin	Miller	kevin.miller@chargepoint.com	ChargePoint, Inc.	254 E. Hacienda Avenue Campbell, California 95008	Electronic Service	No	OFF_SL_15-112_Official
Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP	33 South Sixth St Ste 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_15-112_Official
Debra	Opatz	dopatz@otpc.com	Otter Tail Power Company	215 South Cascade Street Fergus Falls, MN 56537	Electronic Service	No	OFF_SL_15-112_Official
David G.	Prazak	dprazak@otpc.com	Otter Tail Power Company	P.O. Box 496 215 South Cascade Street Fergus Falls, MN 565380496	Electronic Service	No	OFF_SL_15-112_Official
Larry L.	Schedin	Larry@LLSResources.com	LLS Resources, LLC	332 Minnesota St, Ste W1390 St. Paul, MN 55101	Electronic Service	No	OFF_SL_15-112_Official
Stuart	Tommerdahl	stommerdahl@otpc.com	Otter Tail Power Company	215 S Cascade St PO Box 496 Fergus Falls, MN 56537	Electronic Service	No	OFF_SL_15-112_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Andrew	Twite	twite@fresh-energy.org	Fresh Energy	408 St. Peter Street, Ste. 220 St. Paul, MN 55102	Electronic Service	No	OFF_SL_15-112_Official
Daniel P	Wolf	dan.wolf@state.mn.us	Public Utilities Commission	121 7th Place East Suite 350 St. Paul, MN 551012147	Electronic Service	No	OFF_SL_15-112_Official

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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_15-120_Official
Kimberly	Hellwig	kimberly.hellwig@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_15-120_Official
Lori	Hoyum	lhoyum@mnpower.com	Minnesota Power	30 West Superior Street Duluth, MN 55802	Electronic Service	No	OFF_SL_15-120_Official
Michael	Krikava	mkrikava@briggs.com	Briggs And Morgan, P.A.	2200 IDS Center 80 S 8th St Minneapolis, MN 55402	Electronic Service	No	OFF_SL_15-120_Official
James D.	Larson	james.larson@avantenergy.com	Avant Energy Services	220 S 6th St Ste 1300 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_15-120_Official
Douglas	Larson	dlarson@dakotaelectric.com	Dakota Electric Association	4300 220th St W Farmington, MN 55024	Electronic Service	No	OFF_SL_15-120_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Susan	Ludwig	sludwig@mnpower.com	Minnesota Power	30 West Superior Street Duluth, MN 55802	Electronic Service	No	OFF_SL_15-120_Official
Pam	Marshall	pam@energycents.org	Energy CENTS Coalition	823 7th St E St. Paul, MN 55106	Electronic Service	No	OFF_SL_15-120_Official
Kevin	Miller	kevin.miller@chargepoint.com	ChargePoint, Inc.	254 E. Hacienda Avenue Campbell, California 95008	Electronic Service	No	OFF_SL_15-120_Official
Herbert	Minke	hminke@allete.com	Minnesota Power	30 W Superior St Duluth, MN 55802	Electronic Service	No	OFF_SL_15-120_Official
David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022093	Electronic Service	No	OFF_SL_15-120_Official
Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP	33 South Sixth St Ste 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_15-120_Official
Michael	Noble	noble@fresh-energy.org	Fresh Energy	Hamm Bldg., Suite 220 408 St. Peter Street St. Paul, MN 55102	Electronic Service	No	OFF_SL_15-120_Official
Jennifer	Peterson	jjpeterson@mnpower.com	Minnesota Power	30 West Superior Street Duluth, MN 55802	Electronic Service	No	OFF_SL_15-120_Official
Marcia	Podratz	mpodratz@mnpower.com	Minnesota Power	30 W Superior S Duluth, MN 55802	Electronic Service	No	OFF_SL_15-120_Official
Thomas	Scharff	thomas.scharff@versoco.com	Verso Corp	600 High Street Wisconsin Rapids, WI 54495	Electronic Service	No	OFF_SL_15-120_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Eric	Swanson	eswanson@winthrop.com	Winthrop & Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_15-120_Official
Karen	Turnboom	karen.turnboom@versoco.com	Verso Corporation	100 Central Avenue Duluth, MN 55807	Electronic Service	No	OFF_SL_15-120_Official
Andrew	Twite	twite@fresh-energy.org	Fresh Energy	408 St. Peter Street, Ste. 220 St. Paul, MN 55102	Electronic Service	No	OFF_SL_15-120_Official
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_15-120_Official