

August 23, 2013

Burl W. Haar
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. G001/M-13-579

Dear Dr. Haar:

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

A request by Interstate Power and Light Company (Interstate, IPL, or Company) for approval by the Minnesota Public Utilities Commission (Commission) of a change in demand entitlement units effective November 1, 2013.

The filing was submitted on July 1, 2013. The petitioners are:

Kent Ragsdale
Managing Attorney—Regulatory
Interstate Power and Light Company
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Robyn Woeste
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The Department recommends that the Commission **approve** Interstate's proposed level of demand entitlement and **allow** IPL to recover associated demand costs through the monthly Purchased Gas Adjustment effective November 1, 2013.

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

Sincerely,

/s/ ADAM J. HEINEN
Rates Analyst
651-539-1825

AJH/sm
Attachment

BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

COMMENTS OF THE
MINNESOTA DEPARTMENT OF COMMERCE
DIVISION OF ENERGY RESOURCES

DOCKET NO. G001/M-13-579

I. SUMMARY OF THE COMPANY'S PROPOSAL

Pursuant to Minnesota Rules 7825.2910, subpart 2, on July 1, 2013 Interstate Power and Light Company (Interstate, IPL, or Company) filed a proposal to change its demand entitlements (*Petition*) effective November 1, 2013.

Interstate does not propose changes to the overall level of entitlements in this *Petition*. The Company states that a revision in volumes related to the Northern Natural Gas (Northern) TF-12 split may occur at a later date; as such, Interstate anticipates making a supplemental filing on, or about, November 1, 2013. It is important to note that if a TF-12 split revision occurs, it will only impact how these associated volumes are billed, and will have no impact on the overall level of demand entitlements.

Even though Interstate does not propose changes in its total entitlement level, the Company's proposal does include a new design-day analysis, which results in a change in the projected design day. The Company's proposal would decrease the Company's proposed design-day level by 407 MMBtu/day from 13,442 MMBtu/day to 13,035 MMBtu/Day. The total entitlement level of 14,219 MMBtu/day is inclusive of the re-alignment of capacity to Iowa that Interstate discussed in its September 18, 2012 *Reply Comments* in Docket No. G001/M-12-737. For the sake of clarity, IPL appears to be requesting a decrease in total entitlement levels of 403 MMBtu/day from the levels requested in the initial filing of Company's previous demand entitlement filing; however, the total entitlement discussed in last year's initial filing does not involve a re-alignment of capacity but rather a turn back in capacity to Northern. Subsequent to the initial filing in the previous demand entitlement docket, the Company decided, instead, to re-align capacity to the currently requested level of 14,219 MMBtu/day, which was the entitlement level charged to customers during the 2012-2013 heating season.

At the current time, since the Company does not propose a change in overall entitlement levels, and the potential TF-12 split remains unresolved, there is no request for a change in rates to customer classes at this time. The Minnesota Department of Commerce, Division of Energy Resources (Department) will discuss any rate changes, if applicable, after Interstate makes its final, supplemental filing to be made on, or about, November 1, 2013.

II. THE DEPARTMENT'S ANALYSIS OF THE COMPANY'S PROPOSAL

The Department's analysis of the Company's request includes the following sections:

- the proposed overall demand entitlement level;
- the design-day requirement;
- the reserve margin; and
- the PGA cost recovery proposal.

A. THE COMPANY'S DEMAND ENTITLEMENT LEVEL

1. Proposed Overall Demand Entitlement Level

As indicated in Department Attachment 1, the Company did not propose changes to its overall entitlement level compared to last heating season's total entitlement level.

Previous Entitlement (MMBtu)	Proposed Entitlement (MMBtu)	Entitlement Changes (MMBtu)	% Change From Previous Year
14,219	14,219	0	0%

The Department analyzes below the proposed design day requirement and the proposed reserve margin. The Department also concludes that the Company's proposed recovery of overall demand costs is reasonable.

2. Design-Day Requirement

Interstate used a design day which is largely identical to what it used in its previous demand entitlement filing; however, the Company also included additional calculations which tie the reserve margin to the statistical results from the design-day analysis. This additional analysis was in response to a Department request in the Company's most recent demand entitlement filing, Docket No. G001/M-12-737. The Department appreciates that the Company included this additional information in its *Petition*.

Interstate calculated its design day using historical daily heating season weather and throughput data over the period from November 2008 to March 2013. It is important to note that Interstate did not include holidays, weekends, and days with average temperatures warmer than 50°F in its daily data. In its April 1, 2013 *Supplemental Filing* in Docket No. G001/M-12-737, the Company stated that it does not include these days in its analysis because they are unlikely to represent a peak day event. In addition, the Company stated that since its analysis is cross-sectional in nature (*i.e.*, each data point is independent) the inclusion of these omitted dates is not necessary for the statistical integrity of the analysis. Although there is likely some relationship between weather and usage on a day-over-day basis (*i.e.*, cold spells), these relationships likely are not that great; as such, the Company's decision to undertake a cross-sectional analysis is not inappropriate.

Interstate provided its supporting data, design-day regression equations, and design-day calculations in its *Petition*. Included in the design-day calculations is a full derivation of how the Company calculated interruptible sales. Interstate must estimate interruptible sales because the interstate pipelines (*e.g.*, Northern) do not collect daily data on a per-class basis and the Company's interruptible customers are not required to have telemetering. Interstate estimated natural gas use by interruptible customers at peak periods using the following steps:

1. Subtract from total peak-month use the interruptible transport load to obtain peak-month sales data.
2. Subtract from peak-month sales data the estimated non-weather use by interruptible customers, based on the average daily summer (non-heat) usage by interruptible customers, multiplied by the number of days in the peak month.
3. Estimate the weather-sensitive load of interruptible customers by subtracting the non-weather use by interruptible customers (estimated in step 2) from total use by interruptible customers in the peak month and dividing this weather-sensitive load by the number of heating degree days in the peak month. This calculation results in an estimate of the heating-related load of interruptible customers per degree day.
4. Multiply the heating-related load of interruptible customers per degree day obtained in step 3 by the design-day heating degree days and subtract this amount from the amount in step 2. This calculation results in the peak-month use by firm sales customers. These values are limited to values greater than or equal to zero.

Interstate's current design-day analysis resulted in a slight decrease (407 MMBtu/day) in peak-day estimates compared to its last design-day analysis. Based on the information in DOC Attachment 2, Interstate's current peak-day forecast resulted in a figure that is less than the peak-day sendout during the 2003-2004 heating season. Generally, this result would elicit serious concerns regarding a utility's ability to serve firm customers on a peak day; however, Interstate's historical peak-day sendout amounts included usage by interruptible customers, which resulted in an over-estimation of the amount of entitlements necessary to serve firm customers on a peak day. As discussed above, Interstate's current peak-day forecast method adjusts for interruptible customer usage. Given the significant decrease in the Company's peak-day estimates over the

last three demand entitlement filings compared to historical analyses, it is reasonable to assume that interruptible use was a significant portion of the higher peak-day throughput volumes experienced during earlier heating seasons.

In last year's demand entitlement filing, the Company stated that, in terms of weather data used in its design-day analysis, it used data from the same source as was used in its most recent electric rate case. The only difference between these data is that the gas data used in the demand entitlement filings are based on a gas day (*i.e.*, 10 am to 9 am) and the electric data is based on a calendar day (*i.e.*, 12 am to 11 pm). These weather data were not provided in the most recent demand entitlement filing; as such, the Department recommended that Interstate provide these hourly weather data in future demand entitlement filings. Interstate complied with this request and provided hourly weather data in its *Petition*. The Department reviewed these hourly weather data and observed minor differences between the hourly data provided in this demand entitlement filing and the weather data provided in the most recent electric rate case.¹ The differences appear related to the gas day and calendar day difference noted in the previous demand entitlement filing; as such, the Department does not have any concerns with the Company's raw weather data at this time.

Based on its review, the Department concludes that Interstate's design-day analysis likely estimates sufficient capacity to serve firm need on a peak day.

3. Reserve Margin

As indicated in Department Attachment 2, Interstate's proposed reserve margin is as follows:

Total Entitlement (Dkt)	Design-day Estimate (Dkt)	Difference (Dkt)	Reserve Margin %	% Change From Previous Year²
14,219	13,035	1,184	9.08	3.30

As a result of the small decrease in Interstate's estimated design-day throughput and maintaining the same level of total entitlements, the Company's estimated design-day reserve margin increased from 5.78 percent to 9.08 percent. This is a noticeable increase in the reserve margin and brings the reserve margin above what has historically been the 5 percent reserve margin objective. As noted in earlier demand entitlement filings, the 5 percent reserve margin threshold is subjective because it is based on the operational circumstances for a different utility. As such, the Department concluded, in Docket No. G001/M-12-737, that a more appropriate reserve margin would be one that is related to Interstate's operational characteristics and tied to the Company's own design-day analysis. Therefore, the Department requested, in Interstate's most

¹ It is important to note that hourly data was not provided in the most recent electric rate case.

² As shown in DOC Attachment 2, the Company's average reserve margin since 1994 is 10.69 percent.

recent demand entitlement filing, that the Company examine methods that would tie the reserve margin with its statistical analysis. Interstate included calculations that attempt to tie its reserve margin to its design-day analysis in its *Petition*.

The Company tied the reserve margin to its design-day analysis by using the standard deviation of the design-day model residuals and a confidence interval determinant. Before analyzing the approach, it is important to introduce the concepts used by Interstate.

The residual provides a quantifiable measure of the difference between actual values and those values estimated by the regression model. The standard deviation is a statistical principle that measures the variation of the data points from the average value for a set of data. In the case of Interstate's approach, the Company attempted to determine the level of variability in the regression (model) error compared to average regression (model) error. The confidence interval determinant helps provide a measure of the degree of certainty that regression results are within a given forecasting, or error, band. In other words, if you select a 95 percent confidence interval, which Interstate did in its analysis, this would suggest that there is a 95 percent chance that the model results will be within the forecasting, or error, band.

Based on a review of Interstate's approach, the Department believes it represents an acceptable method of tying the reserve margin to the Company's design-day analysis. The combination of the standard deviation of the residuals and the confidence interval statistics allowed the Company to quantify the amount of use per customer that needs to be procured to account for expected error when forecasting peak day consumption. Clearly, this projection error will vary day-to-day, but this method is an acceptable means of accounting for this occurrence. The acceptability of this approach is underscored by the fact that over the estimation period, Interstate's model had very few instances where estimation error, on a daily basis, was over two standard deviations from average error. This is important because two standard deviations are typically seen as an indicator for an "unusual" event. Based on the Department's review of regression data, there were instances where individual, daily residuals were more than two standard deviations away from the average error; however, under each circumstance these events occurred during the shoulder months (*e.g.*, late March, November) which are unlikely to experience peak events. As such, the Department concludes that the representative throughput amount related to modeling error appears consistent.

The Department compared Interstate's proposed entitlement level with the level that would be produced by using the Company's method tying the reserve margin to the regression results. The figures are not the same, which shows that the Company's proposed reserve margin is not tied explicitly to the results of the design-day analysis. The Company's proposed total entitlement level, 14,219 MMBtu/day, is 141 MMBtu/day less than the 14,360 MMBtu/day which would result from the 95 percent confidence interval analysis conducted by Interstate. Despite this difference, the Department does not believe the difference is significant or greatly impacts firm reliability for three reasons. First, the difference between the values is approximately 1 percent, which is small and likely within the forecasting error for the regression model. Second, both of these values are greater than the Company's design-day estimate, which is Interstate's projection of use on a peak day; as such, Interstate's decision to use a smaller total entitlement level results

in a smaller reserve margin rather than inadequate supply. Third, the difference in values may be related to how Northern sells entitlements. Northern sells entitlements in package amounts (*e.g.*, 200 MMbtu/day, 300 MMbtu/day) so it is possible that Interstate decided not to purchase additional capacity because it would have resulted in procurement of too much capacity.

Based on its review of Interstate's reserve margin method, the Department concludes that the Company's reserve margin is reasonable in this proceeding. The Department continues to encourage IPL to provide, in future demand entitlement filings, its analysis tying the reserve margin to the Company's design-day analysis to serve as a check on the appropriateness of its proposed reserve margin.

B. THE COMPANY'S PGA COST RECOVERY PROPOSAL

The demand entitlement amounts listed in DOC Attachment 1 represent the demand entitlements for which the Company's firm customers would pay. In its *Petition*, the Company compared its proposed November 2013 Purchased Gas Adjustment (PGA) changes to its July 2013 PGA as a means of highlighting its changes.³ As noted above, and in the Company's *Petition*, Interstate did not propose changes to its total entitlement levels; therefore, there is no change in annual bills, related to demand costs, for the Company's ratepayers. There may, however, be changes related to re-allocation of TF-12 service, but this will not be known until Interstate makes its supplemental filing on, or about, November 1, 2013. The Department will provide further comments, if appropriate, at that time.

III. THE DOC'S RECOMMENDATIONS

The Department recommends that the Commission:

- approve Interstate's proposed level of demand entitlement; and
- allow IPL to recover associated demand costs through the monthly Purchased Gas Adjustment effective November 1, 2013.

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³ Interstate Attachment A, Pages 6 and 7 of 8. Please note that Interstate does not vary its commodity cost of gas in its comparison.

Minnesota Department of Commerce, Division of Energy Resources
 Interstate's Minnesota System Demand Entitlements: Historical and Current Proposal
 Docket No. G001/M-13-579
 DOC Attachment 1

Interstate Power and Light (Gas Utility) Proposed Entitlements

2009-2010 Heating Season G001/M-12-04		2010-2011 Heating Season G001/M-10-155		2011-2012 Heating Season G001/M-11-1066		2012-2013 Heating Season- Revised G001/M-12-737		2013-2014 Heating Season G001/M-13-579	
Quantity (Mcf)	Difference	Quantity (Mcf)	Difference	Quantity (Mcf)	Difference	Quantity (Mcf)	Difference	Quantity (Mcf)	Difference
TF-12 Base	4,256 (82)	4,020 (248)	214	4,234	214	3,377	(857)	3,377	3,377
TF-12 Variable	7,248 92	7,494 246	(47)	7,447	(47)	7,447	(1,411)	6,036	6,036
TF-5	5,176 0	5,176 0	(167)	5,009	(167)	5,009	(1,003)	4,006	4,006
TFX	800 0	800 0	0	800	0	800	0	800	0
LP Peak Shaving	0 0	0 0	0	0	0	0	0	0	0
FDD	5,984 0	5,984 0	0	5,984	0	5,984	0	5,984	0
FDD - Capacity	68,992 0	68,992 0	0	68,992	0	68,992	0	68,992	0
TFF	0 0	0 0	0	0	0	0	0	0	0
SMS	1,676 0	1,676 0	0	1,676	0	1,676	0	1,676	0
SBA	0 0	0 0	0	0	0	0	0	0	0
Total Design-Day Capacity	17,480 0	17,480 0	0	17,480 0	0	17,480 0	(3,271)	14,219 0	14,219 0
Total Transportation	17,480 0	17,480 0	0	17,480 0	0	17,480 0	(3,271)	14,219 0	14,219 0
Total Peak Shaving Capacity	0 0	0 0	0	0 0	0	0 0	0	0 0	0 0
Total Annual Transportation	11,514 0	11,514 0	167	11,681	167	11,681	(2,280)	9,413 0	9,413 0
Total Season Transportation	5,978 0	5,978 0	(167)	5,809	(167)	5,809	(1,003)	4,806 0	4,806 0
Peak Shaving as % of Total Capacity	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Annual Transportation as % of Capacity	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Seasonal Transportation as % of Capacity	66.8%	65.8%	1.0%	66.8%	1.0%	66.8%	-0.6%	66.2%	66.2%
Total Capacity	34.2%	34.2%	-1.0%	33.2%	-1.0%	33.2%	0.6%	33.8%	33.8%
Seasonal Transportation as % of Total Transportation	34.2%	34.2%	-1.0%	33.2%	-1.0%	33.2%	0.6%	33.8%	33.8%
Total Transportation	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.6%	0.0%	0.0%

Note: Only items in bold (transportation services and peak shaving capacity) affect the total entitlement level.

Minnesota Department of Commerce, Division of Energy Resources
 Interstate's Minnesota System Demand Entitlement Analysis

Docket No. G001/M-13-579

DOC Attachment 2

Interstate Power and Light (Gas Utility)

Heating Season	Number of Firm Customers		Design Day Requirement			Total Entitlement + On-line Storage + Peak Shaving		Reserve Margin (10)		
	(1)	(2)	(3)	(4)	(5)	(6)	(7)		(8)	(9)
	Number of Customers	Change from Previous Year	% Change From Previous Year	Design Day (Mcf)	Change from Previous Year	% Change From Previous Year	Total Entitlement (Mcf)	Change from Previous Year	% Change From Previous Year	Reserve Margin [(7)-(4)](4)
2013-2014	10,676	68	0.64%	13,035	(407)	-3.03%	14,219	0	0.00%	9.08%
2012-2013	10,608	(41)	-0.39%	13,442	515	3.98%	14,219	(3,271)	-18.70%	5.78%
2011-2012	10,649	66	0.62%	12,927	(3,767)	-22.56%	17,490	0	0.00%	35.30%
2010-2011	10,583	0	0.00%	16,694	133	0.80%	17,490	0	0.00%	4.77%
2009-2010	10,583	(23)	-0.22%	16,561	(150)	-0.90%	17,490	0	0.00%	5.61%
2008-2009	10,606	8	0.08%	16,711	(18)	-0.11%	17,490	0	0.00%	4.66%
2007-2008	10,598	10	0.09%	16,729	94	0.57%	17,490	0	0.00%	4.55%
2006-2007	10,588	95	0.91%	16,635	22	0.13%	17,490	0	0.00%	5.14%
2005-2006	10,493	9	0.09%	16,613	377	2.32%	17,490	(630)	-2.94%	5.28%
2004-2005	10,484	(55)	-0.52%	16,236	(829)	-4.86%	18,020	(120)	-0.66%	10.99%
2003-2004	10,539	74	0.71%	17,065	125	0.74%	18,140	239	1.34%	6.30%
2002-2003	10,465	72	0.69%	16,940	111	0.66%	17,901	250	1.42%	5.67%
2001-2002	10,393	83	0.81%	16,829	(7)	-0.04%	17,651	800	4.75%	4.88%
2000-2001	10,310	91	0.89%	16,836	496	3.04%	16,851	632	3.90%	0.09%
1999-2000	10,219	(138)	-1.33%	16,340	(1,013)	-6.84%	16,219	(4,565)	-21.93%	-0.74%
1998-1999	10,357	68	0.66%	17,353	158	0.92%	20,774	0	0.00%	19.71%
1997-1998	10,289	68	0.67%	17,195	157	0.92%	20,774	0	0.00%	20.81%
1996-1997	10,221	68	0.67%	17,038	157	0.93%	20,774	0	0.00%	21.93%
1995-1996	10,153	232	2.34%	16,881	(1,416)	-7.74%	20,774	(500)	-2.35%	23.06%
1994-1995	9,921			18,297			21,274			16.27%
Average Per Year:	10,437	40	0.39%	16,318	(277)	-1.58%	17,829	(371)	-1.85%	10.46%

Firm Peak Day Sendout

Heating Season	Firm Peak Day Sendout (Mcf)	(11)	(12)	(13)	(14)	(15)	(16)	(17)
2013-2014	9,912	n/a	n/a	0.1109	0.0782	1.2572	1,3319	n/a
2012-2013	8,412	1,500	17.83%	0.0782	0.4285	1.2672	1,3404	0.9344
2011-2012	10,242	(1,830)	-17.87%	0.4285	0.0782	1.2139	1,8424	0.7899
2010-2011	11,973	(1,731)	-14.46%	0.0782	0.0782	1.5774	1,6527	0.9678
2009-2010	12,536	(563)	-4.45%	0.0782	0.0782	1.5649	1,6527	1.1313
2008-2009	10,872	1,664	15.31%	0.0782	0.0782	1.5756	1,6491	1.1820
2007-2008	11,586	(714)	-6.16%	0.0782	0.0782	1.5785	1,6503	1.0259
2006-2007	12,051	(465)	-3.86%	0.0808	0.0808	1.5711	1,6519	1.0943
2005-2006	12,051	12	0.10%	0.0836	0.0836	1.5632	1,6668	1.1485
2004-2005	12,039	(1,960)	-14.00%	0.1702	0.1702	1.5486	1,7188	1.1483
2003-2004	13,999	1,673	13.57%	0.1020	0.1020	1.6192	1,7212	1.3283
2002-2003	12,326	1,453	13.36%	0.0918	0.0918	1.6187	1,7106	1.1778
2001-2002	10,873	(4,203)	-27.88%	0.0791	0.0791	1.6193	1,6984	1.0462
2000-2001	15,076	1,692	12.64%	0.0015	0.0015	1.6330	1,6344	1.4623
1999-2000	13,384	(2,202)	-14.13%	(0.0118)	(0.0118)	1.5990	1,5871	1.3097
1998-1999	15,586	2,230	16.70%	0.3303	0.3303	1.6755	2,0058	1.5049
1997-1998	13,356	(695)	-4.95%	0.3478	0.3478	1.6712	2,0190	1.2981
1996-1997	14,051	(1,719)	-10.90%	0.3655	0.3655	1.6670	2,0325	1.3747
1995-1996	15,770	(56)	-0.35%	0.3834	0.3834	1.6627	2,0461	1.5532
1994-1995	15,826			0.3001	0.3001	1.8443	2,1443	1.5952
Average Per Year:	12,625	(329)	-1.64%	0.1623	0.1623	1.5656	1,7278	1.2144

Note: Interstate discontinued peak-shaving on its system after the 1998-1999 demand entitlement. The inclusion of peak-shaving in Interstate's total entitlement levels contributes to the large reserve margins prior to the 1999-2000 heating season.

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. G001/M-13-579

Dated this 23rd day of August, 2013

/s/Sharon Ferguson

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