

September 2, 2014

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. G011/M-14-369

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 Minnesota Energy Resources Corporation (MERC or the Company) for Approval of the Company's 2013 Natural Gas Conservation Improvement Program Tracker Account, Including a Proposed 2013 Demand Side Management Financial Incentive and a revised Conservation Cost Recovery Adjustment (*Petition*).

The *Petition* was filed on May 1, 2014 by:

Jim Phillippo
Program Manager, Energy Efficiency Programs
Minnesota Energy Resources Corporation
2665 145th Street West
Rosemount, Minnesota 55068-0455

The Department recommends **approval, with modification**. The Department is available to answer any questions that the Minnesota Public Utilities Commission may have.

Sincerely,

/s/ HOLLY LAHD
Rates Analyst

HL/lt
Attachment

BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

COMMENTS OF THE
MINNESOTA DEPARTMENT OF COMMERCE
DIVISION OF ENERGY RESOURCES

DOCKET No. G011/M-14-369

I. SUMMARY OF THE UTILITY'S PROPOSAL

On May 1, 2014, Minnesota Energy Resources Corporation (MERC or the Company) submitted its annual Conservation Improvement Program (CIP) report (*Petition*) for 2013 with the Minnesota Public Utilities Commission (Commission) in Docket No. G011/M-14-369. On August 25, 2014, the Company filed a revised *Petition*, correcting errors in its CIP tracker accounts and Demand Side Management (DSM) financial incentive. The revised *Petition* contains the following sections:

- proposed recoveries and expenditures in the Company's natural gas (gas) CIP tracker accounts during 2013,
- proposed change in the Company's currently approved gas Conservation Cost Recovery Adjustment (CCRA),
- request for approval of a proposed gas DSM financial incentive of \$2,492,730 for 2013, and
- request for approval to consolidate MERC's PNG and NMU CIP tracker accounts.

The Company also filed its 2013 CIP Status Report (*Status Report*). The *Status Report* is intended to fulfill the requirements of the Minnesota Department of Commerce, Division of Energy Resources' (Department) annual CIP reporting rules contained in Minnesota Rules part 7690.0500. Since the Company's *Status Report* does not require Commission approval, this portion of the *Petition* has been assigned to a separate docket.¹

The current *Petition* is the first DSM incentive, CIP tracker account, and CCRA request filing made by the consolidated MERC. In MERC-PNG's and MERC-NMU's 2012 DSM financial incentive, CIP tracker account, and CCRA filings, the Commission ordered the Companies to

¹ See Docket No. G011/CIP-12-548.01.

submit schedules of all adjustments made to arrive at the 2013 tracker balance.² These adjustments include repayment of CIP expenses by customers who were incorrectly treated as CIP-exempt.

II. THE DEPARTMENT'S ANALYSIS

The Department's analysis of MERC's *Petition* is provided below in the following sections:

- in Section II.A, MERC's proposed 2013 gas DSM financial incentive;
- in Section II.B, MERC's proposed 2013 gas CIP tracker accounts and consolidation request;
- in Section II.C, MERC's proposed CCRA;
- in Section II.D, a review of MERC's gas DSM and CIP activities for the period 2008 through 2013;
- in Section II.E, a review of MERC's filed conservation cost repayment and adjustment schedule; and
- in Section II.F, an analysis of MERC's carrying charges.

A. MERC'S PROPOSED GAS DSM FINANCIAL INCENTIVE FOR 2013

1. *Background and Summary of MERC's Proposed Gas 2013 DSM Financial Incentive*

Under the Shared Savings DSM financial incentive plan approved by the Commission in Docket No. E,G999/CI-08-133, MERC may request Commission approval of a performance bonus based on the percent of net benefits that the Company achieves. The Commission's January 27, 2010 *Order* explains the incentive as follows:

The New Shared Savings approach emphasizes a 1.5 percent energy savings goal, and ties the incentive earned by the utility to pursuit of the 1.5 percent savings goal. The new approach sets a specific dollar amount per unit of energy saved that each utility will earn at energy savings equal to 1.5 percent of annual non-CIP exempt retail sales. That is referred to as the incentive calibration.

The higher the calibration, the higher the incentive will be at all energy savings levels after the threshold. Specifically, each utility's incentive is calibrated so that when the utility achieves energy savings equal to 1.5 percent of retail sales, electric

² See Docket Nos. G011/M-13-369 and G007/M-13-370.

utilities will earn an incentive equal to \$0.09 times the number of kWh saved³ and gas utilities will earn at a range from \$4.50 to \$6.50 times the number of thousand cubic feet (Mcf) saved.

Importantly, the incremental incentive per additional energy savings achieved is higher than the average incentive achieved. Thus, the closer the energy savings is to reaching the 1.5 percent energy savings goal, the greater the incremental incentive. However, the incentive is still less than the net benefits created through the savings, therefore reserving a majority of the net benefits for ratepayers.

Mandated assessments to utilities will not be included in the calculation of net benefits. Further, as agreed to by the working group, a utility can elect before the beginning of each year whether to include third party programs in its incentive calculation. The costs and benefits of non-elected third party programs will not be included in the calculation.

With respect to net benefits, MERC provided in its *Petition* the benefit/cost results of the revenue requirements test associated with the Company's 2013 gas CIP. According to the Company, this test results in \$17,668,017 of net benefits from CIP activities in 2013. MERC also stated that its CIP activities achieved energy savings in 2013 of 424,827 million cubic feet (MCF) of natural gas. Based on the terms and conditions of its approved DSM incentive plan, MERC requested approval of a DSM financial incentive of \$2,492,730.

2. *The Department's Review of MERC's Proposed 2013 Gas DSM Financial Incentive*

The Department's CIP Engineering Staff review of the demand and energy savings that underpin MERC's proposed 2013 DSM financial incentive is on-going.⁴ In all likelihood, it will not be completed before the fall of 2014. This lag between the Company's request for recovery of the incentive and completion of the Department CIP Engineering Staff review is a recurring phenomenon. In its review of MERC's 2012 DSM financial incentive filings, the Department compensated for this lag by simply assuming MERC's claimed energy savings for 2012 were correct as filed and planned to make, in the instant docket, any adjustments approved by the Deputy Commissioner of the Department. However, the Deputy Commissioner accepted MERC's 2012 Status Report without any adjustments⁵ and thus none need to be made in the instant docket.

³ This calibration was modeled to result in a utility receiving an incentive at historical levels when historical energy savings are achieved.

⁴ Docket No. G011/CIP-12-548.01

⁵ Docket Nos. G011/CIP-09-800.03 and G007/CIP09-803.03.

As was done last year, the Department's analysis assumes that MERC's claimed 2013 energy savings are correct as filed. If the Deputy Commissioner of the Department subsequently approves changes to MERC's energy savings claims that impact either recovery of CIP budgets or levels of Shared Savings DSM financial incentives, those changes can be incorporated in the Company's 2014 filing that will be made April 1, 2015.

MERC's reported gas energy savings level is 424,827 MCF in the Company's 2013 *Status Report*. The Department used the 424,827 MCF energy savings in its review in this docket.

3. *The DOC's Overall Recommendation Concerning MERC's 2013 DSM Financial Incentive*

The Department recommends that the Commission approve MERC's proposed 2013 gas DSM financial incentive of \$2,492,730 to be included in the Company's gas CIP tracker account no sooner than the issue date of the Commission's *Order* in the present docket.

B. *MERC'S 2013 GAS CIP TRACKER ACCOUNT*

In its *Petition*, MERC provided a report on 2013 recoveries and expenditures in the Company's three existing CIP tracker accounts: MERC-NMU, MERC-PNG, and the consolidated MERC tracker accounts.

1. *MERC-NMU's and MERC-PNG's 2013 Tracker Accounts*

Table 1 below provides a summary of activity in MERC-NMU's CIP tracker account during 2013.

Table 1: Summary of MERC-NMU's CIP Tracker Account Activity in 2013

| <u>Description</u> | <u>Time Period</u> | <u>Amount</u> |
|---|-------------------------------------|----------------|
| Beginning Balance | January 1, 2013 | (\$73,609) |
| CIP Expenses | January 1 through December 31, 2013 | 0 ⁶ |
| Carrying Charges | January 1 through December 31, 2013 | (\$127,950) |
| 2010, 2011, 2012 DSM Financial Incentives | | \$2,286,163 |
| Recoveries | January 1 through December 31, 2013 | (\$2,361,560) |
| Ending Balance | 31-Dec-13 | (\$276,955) |

⁶ 2013 CIP expenses are allocated to the consolidated tracker account.

In its December 13, 2013 Order in Docket No. M-13-370, the Commission ordered MERC-NMU to suspend the collection of MERC-NMU's CCRA once the balance reached zero. On May 12, 2014, MERC filed a compliance filing noting that the MERC-NMU tracker balanced reached zero prior to the Commission's Order taking effect January 1, 2014. MERC also noted that they mistakenly continued to charge MERC-NMU customers the CCRA through April 2014. On August 12, 2014, the Company filed a letter detailing the MERC-NMU CCRA customer refund. As the refund covered the over-collected CCRA revenues from 2014, the refund did not impact the 2013 CIP Tracker Account balance. The Department recommends that MERC clearly label the CCRA over-collected revenue and refund in its 2014 CIP Tracker Account filing next year.

MERC-PNG's 2013 CIP tracker account activity is summarized in Table 2 below.

Table 2: Summary of MERC-PNG's CIP Tracker Account Activity in 2013

| <u>Description</u> | <u>Time Period</u> | <u>Amount</u> |
|---|-------------------------------------|----------------|
| Beginning Balance | January 1, 2013 | \$11,706,959 |
| CIP Expenses | January 1 through December 31, 2013 | 0 ⁷ |
| Carrying Charges | January 1 through December 31, 2013 | \$512,832 |
| 2010, 2011, 2012 DSM Financial Incentives | | \$5,320,537 |
| Past Recoveries ⁸ | January 1 through December 31, 2013 | (\$43,264) |
| Recoveries | January 1 through December 31, 2013 | (\$5,314,602) |
| Ending Balance | 31-Dec-13 | \$ 12,182,462 |

2. Consolidation of MERC-PNG and MERC-NMU CIP Tracker Account Balances

All 2013 CIP expenses were recorded in MERC's consolidated CIP tracker account. With this filing, MERC proposes to consolidate the MERC-NMU and MERC-PNG tracker accounts into a single consolidated account, rolling the remaining balances into a single account balance effective January 1, 2015.

Table 3 summarizes the consolidated CIP tracker account activity for 2013.

⁷ CIP expenses are allocated to the consolidated tracker account.

⁸ "Past Recoveries" refers to the CIP expense repayments and adjustments ordered by the Commission in Docket Nos. G011/M-10-407 and G007,011/GR-10-977. See Section E of these comments for a discussion of the CIP expense repayments and adjustments.

Table 3: Summary of MERC's Consolidated Tracker Account Activity in 2013

| <u>Description</u> | <u>Time Period</u> | <u>Amount</u> |
|-------------------------|-------------------------------------|---------------|
| Beginning Balance | January 1, 2013 | \$0 |
| CIP Expenses | January 1 through December 31, 2013 | \$8,630,238 |
| Carrying Charges | January 1 through December 31, 2013 | \$40,005 |
| Recovered in Base Rates | January 1 through December 31, 2013 | (\$6,071,658) |
| Ending Balance | 31-Dec-13 | \$ 2,598,585 |

The Department reviewed MERC's 2013 CIP tracker accounts and recommends that the Commission approve the MERC 2013 CIP tracker account activity summarized in Tables 1 through 3.

C. MERC'S PROPOSED CONSOLIDATED CCRA

In its *Petition*, MERC requested approval of a consolidated CCRA of \$0.00065 per therm, effective with the January 2015 billing month. If approved, this CCRA will be the first CCRA rate for MERC's consolidated customers who were previously MERC-NMU or MERC-PNG customers.

MERC's consolidated CCRA calculation is summarized in Table 4 below.

Table 4: MERC's Calculation of its Proposed CCRA

| <u>Description</u> | <u>Amount</u> |
|---|------------------|
| Consolidated CIP Tracker Account Balance as of January 1, 2015 | \$818,136 |
| CIP Approved Spending Levels for 12 Months beginning January 2015 | \$9,880,403 |
| Requested 2013 DSM Financial Incentive ⁹ | \$2,492,730 |
| CIP Cost Recovery via Base Rates - January-December 2014 | (\$10,923,781) |
| Forecasted December 2015 Balance | \$267,488 |
| Projected Annual Therm Sales for 2015 | 408,944,236 |
| Proposed CCRA (\$/Therm) | \$0.00065 |

The Department identified an error in MERC's calculation of its proposed CCRA. The Department calculates the forecasted December 2015 balance to be \$2,267,488, not the \$267,488 balance calculated by the Company. Table 5 shows the Department's calculation of its proposed CCRA.

⁹ Based on previous DSM Financial Incentives MERC expects that their requested 2013 DSM Financial Incentive, if approved, would not be credited to the tracker until 2015. Likewise, any 2014 DSM Financial Incentive is not expected to be credited to the tracker account until 2016.

Table 5: Department's Calculation of MERC's CCRA

| Description | Amount |
|---|------------------|
| Consolidated CIP Tracker Account Balance as of January 1, 2015 | \$818,136 |
| CIP Approved Spending Levels for 12 Months beginning January 2015 | \$9,880,403 |
| Requested 2013 DSM Financial Incentive ¹⁰ | \$2,492,730 |
| CIP Cost Recovery via Base Rates - January-December 2014 | (\$10,923,781) |
| Forecasted December 2015 Balance | \$2,267,488 |
| Projected Annual Therm Sales for 2015 | 408,944,236 |
| Proposed CCRA (\$/Therm) | \$0.00554 |

Table 6 below compares the Department's calculated CCRA of \$0.00554 per therm in the present docket with current MERC-PNG and MERC-NMU CCRAs.

Table 6: Comparison of MERC's Existing and Proposed CCRAs

| Company | Current CCRA | Proposed MERC Consolidated CCRA | Percent Change |
|----------|--------------|---------------------------------|----------------|
| MERC-PNG | \$0.042 | \$0.00554 | -87% |
| MERC-NMU | 0 | | Not applicable |

As indicated in Table 6, the revised gas CCRA represents an 87 percent decrease from the current CCRA rate charge to MERC-PNG customers; MERC-NMU customers currently pay no CCRA rate because the MERC-NMU tracker balance reached a zero balance, and the CCRA rate was suspended per the Commission's Order in Docket No. G007/M-13-370. The Department recommends that the Commission approve a CCRA of \$0.00554 per therm for all MERC's customer classes, to be effective January 1, 2015 or on the first billing cycle in the next full month after Commission approval, whichever is first. The Company should submit, within 10 days of the issue date of the *Order* in the present docket, a compliance filing with the relevant tariff sheets and necessary calculations that comply with the Commission's determinations.

With respect to customer notification, the Department recommends that the Commission require MERC to include the following bill message in the billing month immediately following the date of the *Order* in the present docket. This message is included on page 10 of MERC's *Petition*.

Effective January 1, 2015, a CCRA (conservation cost recovery adjustment) has been included on your bill. The CCRA is an annual adjustment to true-up under-recovery or over-recovery of CIP (conservation improvement program) expenses. Effective January 1, 2015, the CCRA rate will be \$0.00554 per therm.

¹⁰ Ibid.

In the event that the Commission does not issue an order on MERC's CCRA before January 1, 2015, MERC should revise the bill message with the correct effective date.

D. REVIEW OF MERC'S GAS DSM AND CIP ACTIVITIES (2008-2013)

In Table 7 below, the Department presents a historical comparison of MERC's gas DSM and CIP activities for the period 2008 through 2013. Data for years 2008 through 2012 include both MERC-NMU and MERC-PNG's combined results to make the comparison with the 2013 consolidated MERC's data relevant.

Table 7: History of MERC's CIP Achievements, Expenditures, and Incentives

| | 2008 | 2009 | 2010 | 2011 | 2012 | 2013 ¹¹ |
|---|--------------|--------------|--------------|--------------|--------------|--------------------|
| DSM Financial Incentive | \$ - | \$ 582,288 | \$2,292,375 | \$2,587,948 | \$2,729,531 | \$2,492,730 |
| Incentive as a % of CIP Expenditures | 0% | 19% | 12% | 32% | 27% | 30% |
| Carrying Charges | \$ 136,886 | \$ 396,940 | \$ 616,967 | \$ 592,929 | \$ 496,537 | \$ 424,887 |
| Carrying Charges as a % of CIP Expenditures | 6% | 13% | 3% | 7% | 5% | 5% |
| Year-End Tracker Balances | \$ 5,008,036 | \$ 8,183,421 | \$12,686,756 | \$10,086,519 | \$11,633,350 | \$14,781,047 |
| CIP Expenditures (as reported in status report) | \$ 2,476,407 | \$ 3,122,758 | \$19,349,257 | \$ 8,067,173 | \$ 9,951,018 | \$ 8,353,283 |
| Achieved Energy Savings (Mcf) | 64,517 | 133,570 | 449,441 | 457,747 | 534,596 | 424,827 |
| Average Cost per Mcf Saved | \$ 38.38 | \$ 23.38 | \$ 43.05 | \$ 17.62 | \$ 18.61 | \$ 19.66 |

As indicated in Table 7, compared to 2012, MERC's 2013:

- proposed incentive level is lower;
- energy savings are lower;
- combined year-end tracker balance is higher;
- combined carrying charges are lower¹²; and
- average cost per unit of energy saved is higher.

¹¹ The DSM financial incentive, CIP expenditures, and CIP tracker account balances for 2013 listed in Table 5 are proposed by MERC in the present docket. The 2013 carrying charges and year-end tracker balances include MERC-NMU, MERC-PNG, and consolidated MERC tracker accounts; the 2013 CIP expenditures, DSM financial incentives, and achieved energy savings are credited to the consolidated MERC.

¹² Carrying charges are considered lower than the previous year if a utility's customers are paying less in interest on CIP funds that have not yet been collected.

E. CONSERVATION COST REPAYMENTS AND ADJUSTMENTS

In the Commission's December 13, 2013 Order in Docket No. G011/M-13-369, the Commission directed MERC to file conservation cost repayment and adjustment schedules, starting with the CIP tracker balance used in the G011/M-10-407 docket and all adjustments made to arrive at the tracker balance included in this *Petition*. The adjustments come from two dockets:

- 1) In Docket No. G011/M-10-407, the Commission issued an order suspending MERC-PNG's collection of the CCRA from specific large customers. While the CCRA was suspended many of these large customers received CIP exemptions; a few customers were either denied CIP exemptions or did not apply for a CIP exemption. When the Commission ended the CCRA suspension, the Commission concluded that customers who did not receive a CIP exemption should repay their suspended CCRA amounts on non-onerous terms.
- 2) In Docket No. G007,011/GR-10-977, the Commission required MERC to credit the CIP tracker accounts for the uncollected CCRC revenues from three customers that were incorrectly treated as CIP exempt from the time MERC acquired Aquila in 2006.

In the current *Petition*, MERC filed the CIP tracker adjustment schedule in Attachment E. After reviewing Attachment E the Department concludes that the Company complied with the Commission's Order in filing the conservation cost tracker account schedules.

The Department notes that another customer that was incorrectly treated as CIP exempt has been discovered in MERC's 2013 rate case (Docket No. G011/GR-13-617). This rate case is pending the Commission's decision.

F. CARRYING CHARGES

An analysis of Table 7 indicates that, between 2009 and 2013, MERC's combined energy savings grew 218 percent, the Company's expenditures grew 167 percent, and the Company's incentives grew 328 percent. MERC's combined tracker balances were \$14,781,047 at the end of 2013.

In the last 5 years, MERC's carrying charges have ranged from \$136,886 to \$616,967. As a percent of total CIP expenses, MERC's carrying charges have ranged from 3 to 13 percent of total annual CIP expenditures. MERC's carrying charges are relatively high due to the large year-end tracker balances MERC-PNG experienced over the past few years. The large year-end tracker balances are partly a result of the delays experienced in approving an updated CCRA for MERC-PNG due to problems in previous CIP tracker account filings.

In the past few years, the Department has been working with utilities and the Commission to minimize absolute carrying charges. The Department notes that carrying charges were first approved as part of Minnesota utilities' CIP tracker accounting in the early 1990s. One of the purposes of carrying charges, and allowing timely recovery through a CIP tracker account, was to provide utilities an incentive to invest in energy conservation by ensuring that they not only recovered all conservation costs incurred in a timely manner, but that they also received a carrying charge on uncollected balances. At that time financial incentives for conservation were de minimis. Now, however, the Commission provides large financial incentives for utility investments in CIP (MERC's DSM financial incentives totaled \$7.6 million for 2010-2012).

Rather than continue to calculate carrying charges on positive or negative monthly tracker account balances, the Department recommends that the Commission eliminate carrying charges. The Department concludes that it is reasonable to exclude carrying charges for MERC beginning with this filing.

In the event that the Commission decides not to discontinue MERC's CIP carrying charges, then the Department recommends that the Commission disallow carrying charges on MERC's financial incentive. The Minnesota Chamber of Commerce (the Chamber) made this recommendation for Otter Tail Power Company in the Chamber's May 30, 2014 Comments (see Docket No. E017/M-14-201). The Chamber argued that carrying costs should not be charged "since the utility is not incurring any risk in receiving the incentive nor are dollars being held up to pay for the CIP expenditures." The Department agrees with the Chamber that paying carrying costs on CIP financial incentives is not needed and recommends that MERC remove its incentive when calculating carrying charges.

In summary, the Department recommends that the Commission approve MERC's proposed CIP Adjustment Factor of \$0.00554 per therm. The Department also recommends that the Commission eliminate carrying charges on under- or over-recovered CIP balances. In the event that the Commission decides not to eliminate carrying charges on the entire CIP balance, the Department recommends that the Commission not allow carrying charges on MERC's DSM financial incentive beginning with the month following the Commission's Order in this docket.

III. THE DEPARTMENT'S RECOMMENDATIONS

Based on the analysis provided above, the Department recommends that the Commission:

- 1) approve MERC's 2013 DSM financial incentive of \$2,492,730 to be included in the Company's CIP tracker account no sooner than the issue date of the Commission's *Order* in the present docket;
- 2) approve MERC's 2013 CIP tracker account activities as summarized in Tables 1, 2, and 3 above;
- 3) approve the revised gas CCRA of \$0.00554 per therm for all of MERCs Minnesota customer classes, to be effective January 1, 2015, or on the first billing cycle in the next full month after Commission approval, whichever is later. The approval is conditioned on the Company submitting, within 10 days of the issue date of the *Order* in the present docket, a compliance filing with the relevant tariff sheets and necessary calculations that comply with the Commission's determinations;
- 4) require MERC to include the following bill message (with the appropriate date) following the date of the *Order* in the present docket, or January 1, 2015, whichever is later:

Effective [insert date], a CCRA (conservation cost recovery adjustment) has been included on your bill. The CCRA is an annual adjustment to true-up under-recovery or over-recovery of CIP (conservation improvement program) expenses. Effective [insert date], the CCRA rate will be \$0.000554 per therm;
- 5) find that MERC has complied with the Commission's *Order* in Docket No. G011/M-13-369 regarding the filing of conservation cost repayment and adjustment schedules; and
- 6) eliminate the carrying charge MERC applies to the CIP tracker balance beginning with the month following the date of the Commission's *Order*.

In the event that the Commission decides not to eliminate carrying charges on the entire CIP tracker account, the Department recommends that the Commission not allow carrying charges on MERC's DSM financial incentive.

/lt

CERTIFICATE OF SERVICE

I, Linda Chavez, 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. **G011/M-14-369**

Dated this **2nd** day of **September, 2014**.

/s/Linda Chavez

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| Norm | Harold | N/A | NKS Consulting | 5591 E 180th St Prior Lake, MN 55372 | Paper Service | No | OFF_SL_14-369_M-14-369 |
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| Dave | Johnson | dave.johnson@aeoa.org | Arrowhead Economic Opportunity Agency | 702 3rd Ave S Virginia, MN 55792 | Electronic Service | No | OFF_SL_14-369_M-14-369 |
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| Karen | Moe | karenmoe@minncap.org | MN Community Action Partnership | 100 Empire Drive Suite 202 SAINT PAUL, Minnesota 55103 | Electronic Service | No | OFF_SL_14-369_M-14-369 |
| Andrew | Moratzka | apmoratzka@stoel.com | Stoel Rives LLP | 33 South Sixth Street Suite 4200 Minneapolis, MN 55402 | Electronic Service | No | OFF_SL_14-369_M-14-369 |
| Carl | Nelson | cnelson@mncee.org | Center for Energy and Environment | 212 3rd Ave N Ste 560 Minneapolis, MN 55401 | Electronic Service | No | OFF_SL_14-369_M-14-369 |
| Kim | Pederson | kpederson@otpc.com | Otter Tail Power Company | 215 S Cascade St PO Box 496 Fergus Falls, MN 565380496 | Electronic Service | No | OFF_SL_14-369_M-14-369 |
| James | Phillippo | jophillippo@minnesotaenergyresources.com | Minnesota Energy Resources Corporation | PO Box 19001 Green Bay, WI 54307-9001 | Electronic Service | No | OFF_SL_14-369_M-14-369 |

| First Name | Last Name | Email | Company Name | Address | Delivery Method | View Trade Secret | Service List Name |
|------------|-----------|--|--|---|--------------------|-------------------|------------------------|
| Lisa | Pickard | lpickard@minnkota.com | Minnkota Power Cooperative | 1822 Mill Rd PO Box 13200 Grand Forks, ND 582083200 | Electronic Service | No | OFF_SL_14-369_M-14-369 |
| Bruce | Sayler | bruces@connexusenergy.com | Connexus Energy | 14601 Ramsey Boulevard Ransey, MN 55303 | Electronic Service | No | OFF_SL_14-369_M-14-369 |
| Kristin | Stastny | stastny.kristin@dorsey.com | Dorsey & Whitney LLP | 50 South 6th Street Suite 1500 Minneapolis, MN 55402 | Electronic Service | No | OFF_SL_14-369_M-14-369 |
| Deb | Sundin | deb.sundin@xcelenergy.com | Xcel Energy | 414 Nicollet Mall Minneapolis, MN 55401 | Electronic Service | No | OFF_SL_14-369_M-14-369 |
| Eric | Swanson | eswanson@winthrop.com | Winthrop Weinstine | 225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629 | Electronic Service | No | OFF_SL_14-369_M-14-369 |
| Robert | Walsh | bwalsh@mnvalleyrec.com | Minnesota Valley Coop Light and Power | PO Box 248 501 S 1st St Montevideo, MN 56265 | Electronic Service | No | OFF_SL_14-369_M-14-369 |
| Gregory | Walters | gjwalters@minnesotaenergyresources.com | Minnesota Energy Resources Corporation | 3460 Technology Dr. NW Rochester, MN 55901 | Electronic Service | No | OFF_SL_14-369_M-14-369 |

| First Name | Last Name | Email | Company Name | Address | Delivery Method | View Trade Secret | Service List Name |
|------------|-----------|---|------------------------------------|--|--------------------|-------------------|----------------------------------|
| George | Agriesti | gagriesti@mnpower.com | Minnesota Power | 30 W Superior St Duluth, MN 55802 | Electronic Service | No | SPL_SL__CIP SPECIAL SERVICE LIST |
| Julie Rae | Ambach | jambach@shakopeeutilities.com | Shakopee Public Utilities | 255 Sarazin St Shakopee, MN 55379 | Electronic Service | No | SPL_SL__CIP SPECIAL SERVICE LIST |
| Julia | Anderson | Julia.Anderson@ag.state.mn.us | Office of the Attorney General-DOC | 1800 BRM Tower 445 Minnesota St St. Paul, MN 551012134 | Electronic Service | No | SPL_SL__CIP SPECIAL SERVICE LIST |
| Tom | Balster | tombalster@alliantenergy.com | Interstate Power & Light Company | PO Box 351 200 1st St SE Cedar Rapids, IA 524060351 | Electronic Service | No | SPL_SL__CIP SPECIAL SERVICE LIST |
| William | Black | bblack@mmua.org | MMUA | Suite 400 3025 Harbor Lane North Plymouth, MN 554475142 | Electronic Service | No | SPL_SL__CIP SPECIAL SERVICE LIST |
| Christina | Brusven | cbrusven@fredlaw.com | Fredrikson Byron | 200 S 6th St Ste 4000 Minneapolis, MN 554021425 | Electronic Service | No | SPL_SL__CIP SPECIAL SERVICE LIST |
| Gary | Chesnut | gchesnut@agp.com | AG Processing Inc. a cooperative | 12700 West Dodge Road PO Box 2047 Omaha, NE 681032047 | Electronic Service | No | SPL_SL__CIP SPECIAL SERVICE LIST |
| Gary | Connett | gconnett@grenergy.com | Great River Energy | 12300 Elm Creek Blvd N Maple Grove, MN 553694718 | Electronic Service | No | SPL_SL__CIP SPECIAL SERVICE LIST |
| George | Crocker | gwillc@nawo.org | North American Water Office | PO Box 174 Lake Elmo, MN 55042 | Electronic Service | No | SPL_SL__CIP SPECIAL SERVICE LIST |
| Jill | Curran | jcurran@mncchamber.com | Minnesota Waste Wise | 400 Robert Street North Suite 1500 St. Paul, Minnesota 55101 | Electronic Service | No | SPL_SL__CIP SPECIAL SERVICE LIST |
| Jeffrey A. | Daugherty | jeffrey.daugherty@centerpointenergy.com | CenterPoint Energy | 800 LaSalle Ave Minneapolis, MN 55402 | Electronic Service | No | SPL_SL__CIP SPECIAL SERVICE LIST |

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|------------|-----------|------------------------------|---|--|--------------------|-------------------|------------------------------------|
| Steve | Downer | sdowner@mmua.org | MMUA | 3025 Harbor Ln N Ste 400 Plymouth, MN 554475142 | Electronic Service | No | SPL_SL_CIP SPECIAL SERVICE LIST |
| Chris | Duffrin | chrisd@thenec.org | Neighborhood Energy Connection | 624 Selby Avenue St. Paul, MN 55104 | Electronic Service | No | SPL_SL_CIP SPECIAL SERVICE LIST |
| Jim | Erchul | | Daytons Bluff Neighborhood Housing Sv. | 823 E 7th St St. Paul, MN 55106 | Paper Service | No | SPL_SL_CIP SPECIAL SERVICE LIST |
| Greg | Ernst | gaernst@q.com | G. A. Ernst & Associates, Inc. | 2377 Union Lake Trl Northfield, MN 55057 | Electronic Service | No | SPL_SL_CIP SPECIAL SERVICE LIST |
| Melissa S | Feine | melissa.feine@semcac.org | SEMCAC | PO Box 549 204 S Elm St Rushford, MN 55971 | Electronic Service | No | SPL_SL_CIP SPECIAL SERVICE LIST |
| Sharon | Ferguson | sharon.ferguson@state.mn.us | Department of Commerce | 85 7th Place E Ste 500 Saint Paul, MN 551012198 | Electronic Service | No | SPL_SL_CIP SPECIAL SERVICE LIST |
| Kelsey | Genung | kelsey.genung@xcelenergy.com | Xcel Energy | 414 Nicollet Mall, Fl. 6 Minneapolis, MN 55401 | Electronic Service | No | SPL_SL_CIP SPECIAL SERVICE LIST |
| Angela E. | Gordon | angela.e.gordon@lmco.com | Lockheed Martin | 1000 Clark Ave. St. Louis, MO 63102 | Electronic Service | No | SPL_SL_CIP SPECIAL SERVICE LIST |
| Pat | Green | N/A | N Energy Dev | City Hall 401 E 21st St Hibbing, MN 55746 | Paper Service | No | SPL_SL_CIP SPECIAL SERVICE LIST |
| Stephan | Gunn | sgunn@appliedenergygroup.com | Applied Energy Group | 1941 Pike Ln De Pere, WI 54115 | Electronic Service | No | SPL_SL_CIP SPECIAL SERVICE LIST |

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|------------|-----------|--|--|---|--------------------|-------------------|-------------------------------------|
| Burl W. | Haar | burl.haar@state.mn.us | Public Utilities Commission | Suite 350 121 7th Place East St. Paul, MN 551012147 | Electronic Service | No | SPL_SL__CIP SPECIAL SERVICE LIST |
| Tony | Hainault | anthony.hainault@co.henn epin.mn.us | Hennepin County DES | 701 4th Ave S Ste 700 Minneapolis, MN 55415-1842 | Electronic Service | No | SPL_SL__CIP SPECIAL SERVICE LIST |
| Patty | Hanson | phanson@rpu.org | Rochester Public Utilities | 4000 E River Rd NE Rochester, MN 55906 | Electronic Service | No | SPL_SL__CIP SPECIAL SERVICE LIST |
| Norm | Harold | N/A | NKS Consulting | 5591 E 180th St Prior Lake, MN 55372 | Paper Service | No | SPL_SL__CIP SPECIAL SERVICE LIST |
| Jared | Hendricks | hendricksj@owatonnautiliti es.com | Owatonna Public Utilities | PO Box 800 208 S Walnut Ave Owatonna, MN 55060-2940 | Electronic Service | No | SPL_SL__CIP SPECIAL SERVICE LIST |
| Holly | Hinman | holly.r.hinman@xcelenergy .com | Xcel Energy | 414 Nicollet Mall, 7th Floor Minneapolis, MN 55401 | Electronic Service | No | SPL_SL__CIP SPECIAL SERVICE LIST |
| Randy | Hoffman | rhoffman@eastriver.coop | East River Electric Power Coop | 121 SE 1st St PO Box 227 Madison, SD 57042 | Electronic Service | No | SPL_SL__CIP SPECIAL SERVICE LIST |
| Karolanne | Hoffman | kmh@dairy.net.com | Dairyland Power Cooperative | PO Box 817 La Crosse, WI 54602-0817 | Electronic Service | No | SPL_SL__CIP SPECIAL SERVICE LIST |
| Tom | Holt | tholt@eastriver.coop | East River Electric Power Coop., Inc. | PO Box 227 Madison, SD 57042 | Electronic Service | No | SPL_SL__CIP SPECIAL SERVICE LIST |
| Michael | Hoy | mhoy@dakotaelectric.com | Dakota Electric Association | 4300 220th St W Farmington, MN 55024-9583 | Electronic Service | No | SPL_SL__CIP SPECIAL SERVICE LIST |

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|------------|-----------|--------------------------------|--|--|--------------------|-------------------|-------------------------------------|
| Anne | Hunt | anne.hunt@ci.stpaul.mn.us | City of Saint Paul | 390 City Hall 15 West Kellogg Boulevard Saint Paul, MN 55102 | Electronic Service | No | SPL_SL__CIP SPECIAL SERVICE LIST |
| Eric | Jensen | ejensen@iwla.org | Izaak Walton League of America | Suite 202 1619 Dayton Avenue St. Paul, MN 55104 | Electronic Service | No | SPL_SL__CIP SPECIAL SERVICE LIST |
| Joel | Johnson | joel@mrea.org | Minnesota Rural Electric Association | 11640 73rd Ave N Maple Grove, MN 55369 | Electronic Service | No | SPL_SL__CIP SPECIAL SERVICE LIST |
| Dave | Johnson | N/A | Community Action of Minneapolis | 2104 Park Ave S Minneapolis, MN 55404 | Paper Service | No | SPL_SL__CIP SPECIAL SERVICE LIST |
| Paula | Johnson | paulajohnson@alliantenergy.com | Alliant Energy-Interstate Power and Light Company | P.O. Box 351 200 First Street, SE Cedar Rapids, IA 524060351 | Electronic Service | No | SPL_SL__CIP SPECIAL SERVICE LIST |
| Dave | Johnson | dave.johnson@aeoa.org | Arrowhead Economic Opportunity Agency | 702 3rd Ave S Virginia, MN 55792 | Electronic Service | No | SPL_SL__CIP SPECIAL SERVICE LIST |
| Larry | Johnston | lw.johnston@smmpa.org | SMMPA | 500 1st Ave SW Rochester, MN 55902-3303 | Electronic Service | No | SPL_SL__CIP SPECIAL SERVICE LIST |
| Deborah | Knoll | dknoll@mnpower.com | Minnesota Power | 30 W Superior St Duluth, MN 55802 | Electronic Service | No | SPL_SL__CIP SPECIAL SERVICE LIST |
| Tina | Koecher | tkoecher@mnpower.com | Minnesota Power | 30 W Superior St Duluth, MN 558022093 | Electronic Service | No | SPL_SL__CIP SPECIAL SERVICE LIST |
| Kelly | Lady | kellyl@austinutilities.com | Austin Utilities | 400 4th St NE Austin, MN 55912 | Electronic Service | No | SPL_SL__CIP SPECIAL SERVICE LIST |

| First Name | Last Name | Email | Company Name | Address | Delivery Method | View Trade Secret | Service List Name |
|------------|------------|---------------------------------|------------------------------------|--|--------------------|-------------------|----------------------------------|
| Martin | Lepak | N/A | Arrowhead Economic Opportunity | 702 S 3rd Ave Virginia, MN 55792 | Paper Service | No | SPL_SL__CIP SPECIAL SERVICE LIST |
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| Pam | Marshall | pam@energycents.org | Energy CENTS Coalition | 823 7th St E St. Paul, MN 55106 | Electronic Service | No | SPL_SL__CIP SPECIAL SERVICE LIST |
| Scot | McClure | scotmcclure@alliantenergy.com | Interstate Power And Light Company | 4902 N Biltmore Ln PO Box 77007 Madison, WI 537071007 | Electronic Service | No | SPL_SL__CIP SPECIAL SERVICE LIST |
| John | McWilliams | jmm@dairy.net | Dairyland Power Cooperative | 3200 East Ave SPO Box 817 La Crosse, WI 54601-7227 | Electronic Service | No | SPL_SL__CIP SPECIAL SERVICE LIST |
| Brian | Meloy | brian.meloy@stinsonleonard.com | Stinson, Leonard, Street LLP | 150 S 5th St Ste 2300 Minneapolis, MN 55402 | Electronic Service | No | SPL_SL__CIP SPECIAL SERVICE LIST |
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| First Name | Last Name | Email | Company Name | Address | Delivery Method | View Trade Secret | Service List Name |
|------------|-----------------|-----------------------------------|-----------------------------------|---|--------------------|-------------------|-------------------------------------|
| Gary | Myers | garym@hpuc.com | Hibbing Public Utilities | 1902 E 6th Ave Hibbing, MN 55746 | Electronic Service | No | SPL_SL__CIP SPECIAL SERVICE LIST |
| Susan K | Nathan | snathan@appliedenergygroup.com | Applied Energy Group | 2215 NE 107th Ter Kansas City, MO 64155-8513 | Electronic Service | No | SPL_SL__CIP SPECIAL SERVICE LIST |
| Carl | Nelson | cnelson@mncee.org | Center for Energy and Environment | 212 3rd Ave N Ste 560 Minneapolis, MN 55401 | Electronic Service | No | SPL_SL__CIP SPECIAL SERVICE LIST |
| Gary | Olson | | Product Recovery, Inc. | 2605 E Cliff Rd Burnsville, MN 55337 | Paper Service | No | SPL_SL__CIP SPECIAL SERVICE LIST |
| Kim | Pederson | kpederson@otpc.com | Otter Tail Power Company | 215 S Cascade St PO Box 496 Fergus Falls, MN 565380496 | Electronic Service | No | SPL_SL__CIP SPECIAL SERVICE LIST |
| Audrey | Peer | audrey.peer@centerpointenergy.com | CenterPoint Energy | 800 Lasalle Avenue - 14th Floor Minneapolis, Minnesota 55402 | Electronic Service | No | SPL_SL__CIP SPECIAL SERVICE LIST |
| Lisa | Pickard | lpickard@minnkota.com | Minnkota Power Cooperative | 1822 Mill Rd PO Box 13200 Grand Forks, ND 582083200 | Electronic Service | No | SPL_SL__CIP SPECIAL SERVICE LIST |
| Bill | Poppert | | Technology North | 2433 Highwood Ave St. Paul, MN 55119 | Paper Service | No | SPL_SL__CIP SPECIAL SERVICE LIST |
| Cindy | Schweitzer Rott | cindy.schweitzer@clearesult.com | CLEARResult's | S12637A Merrilee Rd. Spring Green, WI 53588 | Electronic Service | No | SPL_SL__CIP SPECIAL SERVICE LIST |
| Tom | Smilanich | | Passive Concepts | 228 6th Ave N South St. Paul, MN 55075 | Paper Service | No | SPL_SL__CIP SPECIAL SERVICE LIST |

| First Name | Last Name | Email | Company Name | Address | Delivery Method | View Trade Secret | Service List Name |
|------------|------------|-----------------------------------|------------------------------------|---|--------------------|-------------------|---------------------------------|
| Ken | Smith | ken.smith@districtenergy.com | District Energy St. Paul Inc. | 76 W Kellogg Blvd St. Paul, MN 55102 | Electronic Service | No | SPL_SL_CIP SPECIAL SERVICE LIST |
| Leo | Steidel | N/A | The Weidt Group | 5800 Baker Rd Minnetonka, MN 55345 | Paper Service | No | SPL_SL_CIP SPECIAL SERVICE LIST |
| John | Steinhoff | | Resource Solutions, Inc. | 318 Kensington Drive Madison, WI 53704 | Paper Service | No | SPL_SL_CIP SPECIAL SERVICE LIST |
| Richard | Szydlowski | rszydlowski@mncee.org | Center for Energy & Environment | 212 3rd Ave N Ste 560 Minneapolis, MN 55401-1459 | Electronic Service | No | SPL_SL_CIP SPECIAL SERVICE LIST |
| SaGonna | Thompson | Regulatory.Records@xcelenergy.com | Xcel Energy | 414 Nicollet Mall FL 7 Minneapolis, MN 554011993 | Electronic Service | No | SPL_SL_CIP SPECIAL SERVICE LIST |
| Steve | Tomac | stomac@bepc.com | Basin Electric Power Cooperative | 1717 E Interstate Ave Bismarck, ND 58501 | Electronic Service | No | SPL_SL_CIP SPECIAL SERVICE LIST |
| Lisa | Wilson | lisa.wilson@enbridge.com | Enbridge Energy Company, Inc. | 1409 Hammond Ave FL 2 Superior, WI 54880 | Electronic Service | No | SPL_SL_CIP SPECIAL SERVICE LIST |
| Robyn | Woeste | robynwoeste@alliantenergy.com | Interstate Power and Light Company | 200 First St SE Cedar Rapids, IA 52401 | Electronic Service | No | SPL_SL_CIP SPECIAL SERVICE LIST |