



85 7th Place East, Suite 500, St. Paul, MN 55101-2198

main: 651.296.4026

tty: 651.296.2860

fax: 651.297.7891

www.energy.mn.gov

July 27, 2012

Burl W. Haar
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
Saint Paul, Minnesota 55101-2147

RE: **Comments of the Minnesota Department of Commerce, Division of Energy Resources**
Docket No. G001/M-12-411

Dear Dr. Haar:

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

2011 Annual Service Quality Report (Report) submitted by Interstate Power and Light Company, an Alliant Energy Company (Interstate or Company).

The *2011 Annual Service Quality Report* was filed on May 1, 2012 by:

Kent Ragsdale
Managing Attorney--Regulatory
Interstate Power and Light Company
200 First Street SE
Cedar Rapids, Iowa 52406-0351

Based on its review of Interstate's 2011 Annual Service Quality Report, the Department recommends that the Commission accept the Company's Report pending the Company's response to various inquiries in Reply Comments.

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

Sincerely,

/s/ ANGELA BYRNE
Financial Analyst
651-296-2510

AB/sm
Attachment

BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

COMMENTS OF THE
MINNESOTA DEPARTMENT OF COMMERCE
DIVISION OF ENERGY RESOURCES

DOCKET NO. G001/M-12-411

I. BACKGROUND

On April 16, 2009, the Minnesota Public Utilities Commission (Commission) opened an investigation into natural gas service quality standards in Docket No. G999/CI-09-409. In its August 26, 2010 *Order* (09-409 *Order*), the Commission established uniform reporting requirements for all regulated Minnesota gas utilities. The 09-409 *Order* prescribed a list of indicators for which data for each calendar year are to be provided by each utility in a miscellaneous tariff filing to be made by the following May 1.

Interstate Power and Light Company, an Alliant Company, (Interstate or Company) was allowed to report commingled gas and electric statistics for answer times from its utility call centers, meter reads, and mislocates. For the first year, the Company also was allowed to report only as much data as possible from 2010 for service extension request response time. For events reportable to the Minnesota Office of Pipeline Safety (MOPS), all utilities were ordered to notify the Commission and the Minnesota Department of Commerce (Department) contemporaneously with their notice to MOPS.

In addition to the requirements in the 09-409 *Order*, the Commission's March 6, 2012 *Order* (11-361 *Order*) in Docket No. G001/M-11-361, *et. al* directed all regulated Minnesota gas utilities to:

- In future annual reports, include data on average speed of answering calls, in addition to reporting on the percentage of calls answered within 20 seconds or less;
- Explain, in their 2011 annual reports, whether the difference between the total percentage of meters (100%) and the percentage of meters read (by both the utility and customers) is equal to the percentage of estimated meter reads;

- Explain, beginning with their 2011 annual reports, the types of extension requests (such as requests for reconnection after disconnection for non-payment) they are including in their data on service extension request response times for both locations not previously served, as well as for locations that were previously served;
- Explain, beginning with their 2011 annual reports, the types of deposits (such as new deposits from new and reconnecting customers and the total number of deposits currently held) included in the reported number of “required customer deposits”; and
- Describe, beginning with their 2011 annual reports, the types of gas emergency calls included in their gas emergency response times, as well as the types of emergency calls included in their reports to the Minnesota Office of Pipeline Safety (MOPS). Provide an explanation of any difference between the reports provided to the Commission and to MOPS.

In the 11-361 *Order*, the Commission also specifically directed Interstate to:

- Beginning in its 2011 annual report, provide the number of miles of pipe it operates in Minnesota;
- Explain how it calculates its 2011 “percentage of calls answered within 20 seconds;”
- Beginning in its 2011 annual report, provide the number of locate requests; and
- Beginning in its 2011 annual report, report all gas service interruptions on its system (not only those service interruptions immediately reportable to the Minnesota Office of Pipeline Safety).

On May 1, 2012, Interstate filed its calendar year 2011 *Annual Service Quality Report* (Report) to comply with the 09-409 *Order* and the 11-361 *Order*.

II. THE DEPARTMENT’S ANALYSIS

In the 09-409 *Order*, the Commission requested that each Minnesota regulated utility provide information on various service quality related reporting metrics. The Department notes that for some metrics, Interstate did not have full calendar year 2010 data. The 09-409 *Order* acknowledged that the Company would not have data for all months of 2010 for all metrics and directed that the Company report as much information as possible in these cases. In the 11-361 *Order*, the Commission requested additional information from all of the utilities to increase the clarity and usability of the previously ordered service quality metrics. The Department addresses each of these reporting metrics below.

A. CALL CENTER RESPONSE TIME

Interstate reported the percentage of calls answered within 20 seconds in both tabular and graphical detail. As the 09-409 *Order* permitted, Interstate reported this metric on a combined gas and electric basis. For 2011, the Company reported that it met the annual standard of

answering 80 percent of call center calls in 20 seconds or less. The average over 12 months was 85.4 percent, while the monthly percentages ranged from a low of 78.9 percent in July to a high of 92.4 percent in February 2011.

Per the 11-361 *Order*, Interstate clarified that it calculated its annualized performance of 85.4 percent using the entire year's data, rather than a simple average of each month's average results. The Company stated that this methodology provides a truer representation of the annual performance. Also in compliance with this order, Interstate reported that its average speed of answer was 19.5 seconds.

The Department acknowledges that Interstate has fulfilled the requirements of the 09-409 and 11-361 *Orders*.

B. *METER READING PERFORMANCE*

Interstate reported the following metrics for combined gas and electric meter-reading performance on pages 2 and 3 of Appendix A in its Report:

- A. the number and percentage of customer meters read by Company 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 Company 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 Company monthly meter-reading staffing levels, by work center or geographical area.

Interstate reported that an annual average of 94.5 percent of customer meters were read by utility personnel and 0.03 percent were ready by the customer in 2011. In each month, at least 89 percent of the Company's Minnesota meters were read. Per the 11-361 *Order*, Interstate explained that the difference between the total percentage of meters read (by IPL and customers) and 100 percent is equal to the percentage of estimated meter reads.

Interstate provided the number of meters unread for 6 to 12 months and for more than 12 months for its Residential, Commercial, Industrial, and Rural customer classes. The Company stated that meters that were not read for more than 12 months were a result of the meter being inaccessible to its meter reading staff. When a meter has not been read for four months or more, Interstate will attempt to contact the customer by phone, letter, email, and door hanger notifications in an effort to arrange a meter reading appointment with the customer.

Table 1 summarizes the number of meters not read by utility personnel for longer than 12 months according to Interstate's current and past annual report.

Table 1: Meters Not Read for Longer than 12 Months

	Residential	Commercial	Industrial	Rural	Total
2010	0	0	0	0	0
2011	18	0	0	0	18

Interstate provided its monthly staffing levels, which was 11 meter reading staff throughout the year.

The Department acknowledges that Interstate has fulfilled the requirements of the 09-409 and 11-361 *Orders*.

C. INVOLUNTARY SERVICE DISCONNECTIONS

The Company referenced the involuntary disconnections data that it reported under Minn. Stat. § 216B.091 and § 216B.096 in Docket No. E,G999/PR-11-02. Interstate also included copies of its monthly Cold Weather Rule reports on pages 5 through 40 of Appendix A in its Report. Table 2 summarizes customer disconnection statistics reported by the Company in its Cold Weather Rule reports.¹

Table 2: 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
2010	37,997	1,976	1,976	100%	509	96	11
2011	42,347	3,772	3,772	100%	490	63	19

*Residential customers only

The Department acknowledges that Interstate has fulfilled the requirements of the 09-409 *Order*.

D. SERVICE EXTENSION REQUESTS

In its 09-409 *Order*, the Commission required that each utility provide in its annual report information on service extension requests in the same manner as detailed in Minnesota Rule 7826.1600, items A and B, except for information already provided in Minnesota Statute sections 216B.091 and 216B.096, subd. 11. The Company provided, as an attachment to its Report, the service extension request data per Minnesota Rules. Interstate further explained that it received requests for gas service at new locations during each month in 2011 except for January, February and March.

¹ Docket Nos. E,G999/PR-10-02 and E,G999/PR-11-02.

For locations previously served, Interstate does not differentiate between the types of requests, therefore reported data covers all requests for initiation of service including reconnects for credit/nonpayment issues. The Company stated that it does not track response time by account for previously served locations, however requests are typically handled the next business day.

For locations not previously served, the average response time to commercial requests was two days, while the average response time to residential requests was 4.1 days. These averages are generally timely and fairly consistent with last year's averages.

The Department acknowledges that Interstate has fulfilled the requirements of the 09-409 and 11-361 *Orders*.

E. CUSTOMER DEPOSITS

The reporting metric for customer deposits is the number of customers required to make a deposit as a condition of receiving service. Interstate reported a total of 405 such accounts for both its natural gas and electric operations in 2011.

Per the 11-361 *Order*, the utilities were required to explain the types of deposits included in the reported number of "required customer deposits." Interstate stated that its data included deposits for new and reconnecting Minnesota customers. The Company also reported that as of December 31, 2011 it held 934 deposits for a total of \$207,524.

The Department acknowledges that Interstate has fulfilled the requirements of the 09-409 and 11-361 *Orders*.

F. CUSTOMER COMPLAINTS

Interstate reported the following metrics for combined gas and electric customer complaints on pages 43 through 52 of Appendix A in its Report:

- 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.

Interstate reported that it received 354 electric and natural gas complaints in 2011, four of which were forwarded to the Consumer Affairs Office. Data provided by the Company showed that 21.2 percent of complaints were resolved upon initial inquiry. The most frequent complaint category was "General Billing." Interstate reported that 59.3 percent of these complaints were resolved by taking the action the customer requested. These statistics represent an improvement in total complaints reported, but a decline in complaints resolved upon initial inquiry (21 percent) compared to 2010 (34 percent) and 2009 (41 percent).

The Department also notes that 46, or 13 percent, of complaints received in 2011 were related to Property Damage. Thirty-nine of the complaints were reported between March and August. The Department requests that Interstate provide a full discussion in Reply Comments regarding the circumstances surrounding these property damage claims and whether anything could, or is being done to prevent recurrence in the future.

The Department also requests that Interstate provide, on a going-forward basis, "Total" columns, in addition to "Monthly Average" columns, for its complaint information in its Appendix A to increase the usability of the data.

The Department acknowledges that Interstate has fulfilled the requirements of the 09-409 *Order*.

G. EMERGENCY LINE RESPONSE TIME

Interstate reported its average speed of answering all emergency calls, for natural gas and electric, by month as required in the 09-409 *Order*. The Company also reported the same information for calls to its direct emergency phone line. In 2011, Interstate fielded a total of 2,546 emergency phone calls during the year with three calls to the Company's direct emergency line. The average response time for all emergency calls was approximately 31 seconds, and the average response time for the direct emergency line was 144 seconds.

In its report, Interstate explained that the average response time was negatively influence by the call volume from July 2011, when severe storms swept through IPL's service territory, greatly impacting IPL's electric system. IPL also stated that the direct emergency line average was greatly skewed by a queue time of 391 seconds for one call caused by the high call volume in July.

The Commission did not specify a metric for the natural gas utilities regarding acceptable average response time to emergency calls in its 09-409 *Order*. However, the Department would expect the Company's average answer time for emergency calls to be approximately 20 seconds, since the Company is required under Minn. Rules, part 7826.1200 to answer 80 percent of all calls within 20 seconds as an electric utility.

Interstate reported an average answer time of 19.5 seconds for all call center calls in 2011 as discussed above, so the Department is concerned that the Company was unable to reach this threshold for its emergency calls. Even after excluding July's call volume and queue time from the annual calculation, Interstate's average answer time is 27 seconds.² Specifically, the months of March through September had average answer times ranging from 28 seconds in May to 52 seconds in September. The Department recommends that the Company fully explain, in Reply Comments, the circumstances surrounding the emergency call wait times during March through September 2011 (excluding July as previously discussed).

In addition, the queue time of 391 seconds for the one direct emergency line call in July is particularly alarming. This is a wait time of over six and a half minutes when a customer is calling regarding "a life threatening emergency, such as a downed wire or gas odor." Interstate stated that this queue time was a result of the high call volume experienced after storms swept through in July. The Department recommends that the Company fully explain, in Reply Comments, what, if anything, is being done to ensure that wait times such as this one do not occur in the future.

The Department acknowledges that Interstate has fulfilled the requirements of the 09-409 *Order*.

H. MISLOCATES

The 09-409 *Order* required Minnesota gas utilities to provide data on mislocates, including the number of times a line is damaged due to a mismarked line or failure to mark a line. Interstate reported five instances of gas line damage due to mismarked or unmarked lines out of 15,332 gas and electric locate requests, or a rate of .33 per 1,000 requests, in 2011.

Since this is the first year Interstate has provided the number of locate requests, the Department cannot make definitive conclusions because it is unaware of underlying trends or historical patterns.

The Department acknowledges that Interstate has fulfilled the requirements of the 09-409 and 11-361 *Orders*.

² $(78,728 \text{ annual queue seconds} - 21,350 \text{ July queue seconds}) / (2,546 \text{ annual calls} - 441 \text{ July calls}) = 27.3 \text{ average seconds.}$

I. DAMAGED GAS LINES

The 09-409 *Order* required Minnesota gas utilities to provide data on damaged gas lines, including the number of lines damaged by Company employees or contractors, the total number of other damage events, and the number of events that were unplanned in nature. Interstate reported 17 incidents of gas system damage in 2011, two of which were caused by Interstate electric employees or contractors working on the Company's behalf installing electric facilities. This calculates to a rate of 7.2 incidents per 100 miles of main.³

Since this is the first year Interstate has provided the miles main pipe it operates, the Department cannot make definitive conclusions because it is unaware of underlying trends or historical patterns.

The Department acknowledges that Interstate has fulfilled the requirements of the 09-409 *Order*.

J. SERVICE INTERRUPTIONS

The 09-409 *Order* required that Minnesota regulated gas utilities collect data regarding service interruptions, separating the data into categories based on whether the event was caused by Company employees or Company contractors, or some other unplanned caused. Interstate reported that there were no service interruptions during the reporting period that were the result of system integrity issues. Interstate further reported that of the 17 damage instances discussed in Sub-Section I above, 15 resulted in gas outages to at least one customer, and only two events met MOPS reporting criteria. These instances reported to MOPS are discussed in greater detail in Sub-Section K of these *Comments*.

The Department acknowledges that Interstate has fulfilled the requirements of the 09-409 and 11-361 *Orders*.

K. MOPS SUMMARIES

The Company is required to summarize major events that require a report being made to the MOPS. These summaries include the ten items that the MOPS requires in its incident reports. They are:

- the location;
- when the incident occurred;
- how many customers were affected;
- how the company was made aware of the incident;
- the root cause of the incident;
- the actions taken to fix the problem;

³ Per the 11-361 *Order*, Interstate reported that, as of December 31, 2011, it operated 236 miles of main and 10,374 service lines.

- what actions were taken to contact customers;
- any public relations or media issues;
- whether the customer or the company relighted; and
- the longest any customer was without gas service during the incident.

Interstate reported two such major events during 2011. The Company provided summaries for both incidents, which included the required information listed above.

The Department notes that according to Interstate, most customers affected by both interruptions were restored by the end of the same day, but many were restored over the several days following these events. Specifically, 16 of the 80 affected customers from the August 30, 2011 interruption were restored more than a day later, and the last customer was not relit until October 26, or 57 days later. Thirty-eight of the 245 affected customers from the September 21, 2011 interruption were restored more than a day later, and the last active customer was not relit until November 3, or 43 days later. The Department requests that Interstate provide a detailed discussion regarding the circumstances leading to these extended interruption periods.

The Department acknowledges that Interstate has fulfilled the requirements of the 09-409 *Order*.

L. EMERGENCY RESPONSE TIME

The 09-409 *Order* required that Minnesota regulated gas utilities collect and provide data regarding gas emergency response times including a percentage breakdown of the number of calls responded to in less than an hour and the percent of calls responded to in more than an hour. In addition, the Commission required Interstate to report the average number of minutes it takes to respond to an emergency on a monthly basis. The Company provided this information in the body of its report.

The Company stated that it was able to respond to 100 percent of its 245 emergency calls in less than one hour. In terms of average response time, Interstate was able, on a monthly basis, to respond to emergency calls in less than 23 minutes. On an annual basis, the Company's average response time was 18.8 minutes. The Department commends Interstate for improving its average response time from last year and encourages the Company to maintain this level of service or better in future years.

In the 11-361 *Order*, all gas utilities were required to describe the types of gas emergency calls included in their gas emergency response times, as well as the types of emergency calls included in their reports to MOPS. The utilities were also required to provide an explanation of any difference between the reports provided to the Commission and to MOPS. Interstate provided types of calls classified as emergencies and stated that any call that is coded as an emergency will be included in the statistical reports submitted both to the Commission and MOPS.

The Department acknowledges that Interstate has fulfilled the requirements of the 09-409 and 11-361 *Orders*.

M. OPERATIONS AND MAINTENANCE (O&M) EXPENSES

Along with the service quality data referenced above, the Commission also required Minnesota gas utilities to report operation and maintenance (O&M) expenses related to customer service in the Federal Energy Regulatory Commission (FERC) 901 and 903 accounts. In 2011, Interstate reported total service quality related O&M expenses of \$121,143, which translates into approximately \$10,095 of O&M expenses per month. Interstate also noted that these O&M expense figures include payroll taxes and benefits.

The Department acknowledges that Interstate has fulfilled the requirements of the 09-409 *Order*.

N. GAS SERVICE QUALITY WORK GROUP

At the Commission meeting held February 2, 2012 regarding Docket No. G002/M-11-361 *et. al*, Northern States Power Company (Xcel) proposed convening a workgroup consisting of the gas utilities and the Department to work on improving consistency in annual reporting. Xcel stated that the focus of the workgroup would be to identify methods for increasing uniformity in reporting among the gas utilities, making the annual comparisons of data for each utility easier, and facilitating assessment of the reports and setting any future reporting requirements. In its March 6, 2012 Order, the Commission directed the parties to convene this workgroup to address a list of specified issues.

The Department and representatives from all regulated Minnesota gas utilities, except for Greater Minnesota Gas, met on Friday, June 22, 2012 at the Department's location. As a result of this meeting, a matrix detailing how each utility reports on or calculates the metrics specified in the Commission's March 6, 2012 Order will be attached to the utilities' 2012 annual reports to be filed May 1, 2013.

III. THE DEPARTMENT'S RECOMMENDATIONS

The Department recommends that the Commission accept the Company's Report pending the Company's response to various inquiries in Reply Comments. The Department also recommends that the Company provide the following in its Reply Comments:

- a full discussion regarding the circumstances surrounding the 39 property damage claims reported March through August and whether anything could, or is being done to prevent recurrence in the future;
- a full explanation regarding the circumstances surrounding the emergency call wait times during March through September 2011 (excluding July);

- a full explanation regarding what, if anything, is being done to ensure that long wait times do not occur on its direct emergency line in the future; and
- a detailed discussion regarding the circumstances leading to the extended interruption periods reported in its two MOPS reports.

In addition, the Department requests that Interstate provide, on a going-forward basis, “Total” columns, in addition to “Monthly Average” columns, for its complaint information in its Appendix A to increase the usability of the data.

/sm

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-12-411

Dated this 27th of July, 2012

/s/Sharon Ferguson

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Bobby	Adam	bobby.adam@conagrafoods.com	ConAgra	Suite 5022 11 ConAgra Drive Omaha, NE 68102	Paper Service	No	OFF_SL_12-411_12-411
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	Yes	OFF_SL_12-411_12-411
Christopher	Anderson	canderson@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022191	Electronic Service	No	OFF_SL_12-411_12-411
City	Attorney	N/A	City of Albert Lea	221 E Clark St Albert Lea, MN 56007	Paper Service	No	OFF_SL_12-411_12-411
William A.	Blazar	bblazar@mnchamber.com	Minnesota Chamber Of Commerce	Suite 1500 400 Robert Street North St. Paul, MN 55101	Paper Service	No	OFF_SL_12-411_12-411
Michael	Bradley	bradley@moss-barnett.com	Moss & Barnett	4800 Wells Fargo Ctr 90 S 7th St Minneapolis, MN 55402-4129	Electronic Service	No	OFF_SL_12-411_12-411
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 500 Saint Paul, MN 551012198	Electronic Service	No	OFF_SL_12-411_12-411
Ronald	Giteck	ron.giteck@ag.state.mn.us	Office of the Attorney General-RUD	Antitrust and Utilities Division 445 Minnesota Street, BRM Tower St. Paul, MN 55101	Electronic Service	No	OFF_SL_12-411_12-411
David	Grover	dgrover@itctransco.com	ITC Midwest	444 Cedar St Ste 1020 Saint Paul, MN 55101-2129	Paper Service	No	OFF_SL_12-411_12-411
Burl W.	Haar	burl.haar@state.mn.us	Public Utilities Commission	Suite 350 121 7th Place East St. Paul, MN 551012147	Electronic Service	Yes	OFF_SL_12-411_12-411

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Karen Finstad	Hammel	Karen.Hammel@ag.state.mn.us	Office of the Attorney General-DOC	1800 BRM Tower 445 Minnesota Street St. Paul, MN 551012134	Electronic Service	No	OFF_SL_12-411_12-411
Annete	Henkel	mui@mutilityinvestors.org	Minnesota Utility Investors	413 Wacouta Street #230 St. Paul, MN 55101	Paper Service	No	OFF_SL_12-411_12-411
Linda	Jensen	linda.s.jensen@ag.state.mn.us	Office of the Attorney General-DOC	1800 BRM Tower 445 Minnesota Street St. Paul, MN 551012134	Electronic Service	No	OFF_SL_12-411_12-411
Jim	Krueger	jkrueger@fmcs.coop	Freeborn-Mower Cooperative Services	Box 611 Albert Lea, MN 56007	Electronic Service	No	OFF_SL_12-411_12-411
John	Lindell	agorud.ecf@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012130	Electronic Service	Yes	OFF_SL_12-411_12-411
Kavita	Maini	kmmaini@wi.rr.com	KM Energy Consulting LLC	961 N Lost Woods Rd Oconomowoc, WI 53066	Paper Service	No	OFF_SL_12-411_12-411
Pam	Marshall	pam@energycents.org	Energy CENTS Coalition	823 7th St E St. Paul, MN 55106	Paper Service	No	OFF_SL_12-411_12-411
David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022093	Electronic Service	No	OFF_SL_12-411_12-411
Jenny L.	Myers	jmyers@iwla.org	Izaak Walton League of America	1619 Dayton Ave. Suite 202 St. Paul, MN 55104	Electronic Service	No	OFF_SL_12-411_12-411
Carl	Nelson	cnelson@mncee.org	Center for Energy and Environment	212 3rd Ave N Ste 560 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_12-411_12-411

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Steven	Nyhus	swnyhus@flaherty-hood.com	Flaherty & Hood PA	525 Park St Ste 470 Saint Paul, MN 55103	Electronic Service	No	OFF_SL_12-411_12-411
Kent	Ragsdale	kentragsdale@alliantenergy.com	Alliant Energy-Interstate Power and Light Company	P.O. Box 351 200 First Street, SE Cedar Rapids, IA 524060351	Paper Service	No	OFF_SL_12-411_12-411
Richard	Savelkoul	rsavelkoul@martinsquires.com	Martin & Squires, P.A.	444 Cedar St Ste 2050 St. Paul, MN 55101	Electronic Service	No	OFF_SL_12-411_12-411
Larry L.	Schedin	Larry@LLSResources.com	LLS Resources, LLC	12 S 6th St Ste 1137 Minneapolis, MN 55402	Paper Service	No	OFF_SL_12-411_12-411
Matthew J.	Schuerger P.E.		Energy Systems Consulting Services, LLC	P.O. Box 16129 St. Paul, MN 55116	Paper Service	No	OFF_SL_12-411_12-411
Ron	Spangler, Jr.	rlspangler@otpc.com	Otter Tail Power Company	215 So. Cascade St. PO Box 496 Fergus Falls, MN 565380496	Electronic Service	No	OFF_SL_12-411_12-411
Joseph	Sullivan	N/A	Flaherty and Hood P.A.	525 Park Street Suite 470 Saint Paul, MN 55103-2011	Paper Service	No	OFF_SL_12-411_12-411
Robyn	Woeste	robynwoeste@alliantenergy.com	Interstate Power and Light Company	200 First St SE Cedar Rapids, IA 52401	Paper Service	No	OFF_SL_12-411_12-411