



KEITH ELLISON
ATTORNEY GENERAL

STATE OF MINNESOTA
OFFICE OF THE ATTORNEY GENERAL

SUITE 1400
445 MINNESOTA STREET
ST. PAUL, MN 55101-2131
TELEPHONE: (651) 296-7575

November 25, 2019

Mr. Daniel Wolf
Executive Secretary
Minnesota Public Utilities Commission
121 Seventh Place East, Suite 350
St. Paul, MN 55101-2147

**Re: In the Matter of Minnesota Power’s Revised Petition for a Competitive Rate
for Energy-Intensive Trade-Exposed (“EITE”) Customers
Docket No. E-015/M-16-564**

Dear Mr. Wolf:

The Office of the Attorney General—Residential Utilities and Antitrust Division (“OAG”) submits these comments in response to Minnesota Power’s request to extend the Company’s EITE rider until final rates take effect in its 2019 rate case. According to the Company’s one-page letter, extending the rider will prevent “misalignment between the Commission’s decisions on new final rates and what impact, if any, the expiration of the current EITE Rider means for all Minnesota Power customers.”¹

The EITE rider provides a temporary rate discount to certain members of the Large Power class (“EITE customers”). The rider took effect in February 2017 and expires in February 2021. Under certain conditions, Minnesota Power may surcharge other customers (“EITE-paying customers”) to recover the discounts given to EITE customers through the rider.² Because of the way the cost-recovery mechanism works, the Company is not currently charging EITE-paying customers for the discounts.³ However, this could easily change by the time final rates take effect in the rate case, which will likely occur no earlier than late 2021.⁴

¹ *EITE Docket*, Docket No. E-015/M-16-564, Moeller Letter (Oct. 7, 2019); *accord 2019 Rate Case*, Docket No. E-015/GR-19-442, Frederickson Direct Testimony at 31 (Nov. 1, 2019).

² *See EITE Docket*, Order Authorizing Cost Recovery with Conditions (Apr. 20, 2017).

³ *See EITE Docket*, Annual Compliance Filing (Feb. 1, 2019) (see pages 6–7 of PDF document).

⁴ In the Company’s last rate case, final rates went into effect more than two years after the initial filing. *See 2016 Rate Case*, Docket No. E-015/GR-16-664. And in that case, there were not three rate cases ahead in the queue, as there are today. Thus, it is possible that final rates in the 2019 rate case will not go into effect until *early 2022*.

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Referring vaguely to rate-impact “misalignment,” Minnesota Power asks the Commission to extend the EITE rider for an indeterminate period. The Commission should reject this request. EITE-paying customers deserve the finality and certainty of knowing that the rider will expire as scheduled and not be dragged out for an unknown number of months. Moreover, as explained below, the Company has not met the statutory prerequisites for an extension, has not shown any other basis for an extension, and inappropriately asks the Commission to prejudge the outcome of the Company’s rate case.

First, rate-impact misalignment is not a valid basis for extending the EITE rider. The EITE statute, Minn. Stat. § 216B.1696, requires that a utility demonstrate a “net benefit” to the utility or the state before implementing an EITE rate. The Commission found a net benefit from the EITE rate in 2016,⁵ but that finding hinged on the specific facts and circumstances presented to the Commission at the time, including the four-year term proposed by the Company. Thus, although Minnesota Power styles its request as a procedural one, granting it would require an affirmative finding that a net benefit exists to support an extension. The Company’s one-page, three-paragraph letter offers no proof that the EITE rate would provide any net benefit beyond its scheduled expiration date.

Even if a net benefit were not required to extend the rider, the record reflects no other basis for an extension. The rider’s expiration will simply mean that EITE customers go back to paying their nondiscounted rate, while EITE-paying customers will no longer be on the hook for surcharges. To put it another way, one set of customers will lose a temporary benefit, unburdening another set of customers. This is the foreseeable result of proposing a time-limited rider, is contemplated by the Commission’s EITE orders, and simply returns rates to the preexisting status quo.

If the feared harm relates solely to “misalignment” in the timing of the rate changes occasioned by the rider’s expiration and the Commission’s rate-case decision, this too was foreseeable and is a problem of the Company’s own making. It was foreseeable that a four-year rider would overlap temporally with the Company’s next rate case. Moreover, if aligning rate impacts were truly a concern, Minnesota Power could have proposed the EITE discount as part of its last rate case.⁶ That way, its impact would have been reflected in base rates, and that impact would only change with final rates in the next rate case. By choosing not to include the EITE discount in its last rate case, and choosing to file the current rate case when it has, the Company created the situation it now complains of. Residential and small business customers should not be penalized for a misalignment that they did not create by having the continuing threat of an EITE surcharge held over their heads.

⁵ See *EITE Docket*, Order Approving EITE Rate, Establishing Cost Recovery Proceeding, and Requiring Additional Filings (Dec. 21, 2016).

⁶ See Minn. Stat. § 216B.1696, subd. 2(d) (providing that utility may recover EITE costs, and refund savings, through either a rate case or a rider).

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Finally, Minnesota Power's request inappropriately invites the Commission to prejudge the decisions that it will make in the Company's pending rate case. The Company's prefiled testimony confirms its plan to, effectively, make the revenue-apportionment impact of the EITE rider permanent using rate design.⁷ Minnesota Power is within its rights to propose any rate design it wants. The Commission, however, cannot predict the outcome of the rate case and should not base its EITE-extension decision on the Company's proposal or on any of the many other potential outcomes in that case. Furthermore, because EITE customers' base rates do not include an EITE discount, it appears that Minnesota Power, by basing its interim rate design on discounted Large Power revenues, has changed the existing rate design in violation of the interim-rate statute, Minn. Stat. § 216B.16, subd. 3.⁸

Minnesota Power may want to keep its largest customers happy by continuing to offer them a discount. But the Company itself proposed both the four-year EITE rider and the general rate increase whose "misalignment" it now argues is a problem. Residential and small business customers should not be punished for a misalignment that they did not create, and they certainly should not be kept on the hook for further surcharges without proof of a net benefit.

For the foregoing reasons, the Commission should deny Minnesota Power's request to extend the EITE rider beyond its approved term. If the Commission decides to change the

⁷ See *2019 Rate Case*, Podratz Direct Testimony at 103 (Nov. 1, 2019) (stating that "[i]nstead of offering a separate discount, Minnesota Power aims to design its Large Power base rates to be reasonably close to the Large Power class cost of service").

⁸ See *id.* (stating that "the EITE rate discount currently in effect is included in present rate revenues for the Large Power class, as shown on Volume 3, Direct Schedule E-1"); compare Required Filing Schedules, Direct Schedule E-1 at 2 (showing present Large Power revenue of \$325,538,419) with Interim Rates Petition, Direct Schedule C-8 (Nov. 1, 2018) (showing same, discounted Large Power revenue amount being used for interim rate increase).

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Executive Secretary
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rider's duration, all options, including terminating the rider effective with interim rates, should be on the table.

Dated: November 25, 2019

Respectfully submitted,

KEITH ELLISON
Attorney General
State of Minnesota

s/ **Peter G. Scholtz**

PETER G. SCHOLTZ

Assistant Attorney General

Atty. Reg. No. 0389936

445 Minnesota Street, Suite 1400

St. Paul, Minnesota 55101-2131

(651) 757-1473 (Voice)

(651) 296-9663 (Fax)

peter.scholtz@ag.state.mn.us

ATTORNEYS FOR OFFICE OF THE
ATTORNEY GENERAL—RESIDENTIAL
UTILITIES AND ANTITRUST DIVISION

AFFIDAVIT OF SERVICE

**Re: In the Matter of Minnesota Power’s Revised Petition for a Competitive Rate
for Energy-Intensive Trade-Exposed (“EITE”) Customers
Docket No. E-015/M-16-564**

STATE OF MINNESOTA)
) ss.
COUNTY OF RAMSEY)

I, JUDY SIGAL, hereby state that on November 25, 2019, I e-filed with eDockets *Comments of the Office of the Attorney General—Residential Utilities and Antitrust Division* and served the same upon all parties listed on the attached service list by email, and/or United States Mail with postage prepaid, and deposited the same in a U.S. Post Office mail receptacle in the City of St. Paul, Minnesota.

s/ Judy Sigal
Judy Sigal

Subscribed and sworn to before me
This 25th day of November, 2019.

s/ Patricia Jotblad
Notary Public

My Commission expires: January 31, 2020.

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Marc	Al	marc.al@stoel.com	Stoel Rives LLP	33 South Sixth St Ste 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_16-564_Official
Christopher	Anderson	canderson@alliete.com	Minnesota Power	30 W Superior St Duluth, MN 558022191	Electronic Service	Yes	OFF_SL_16-564_Official
Lori	Andresen	info@sosbluewater.org	Save Our Sky Blue Waters	P.O. Box 3661 Duluth, Minnesota 55803	Electronic Service	No	OFF_SL_16-564_Official
Peter	Beithon	pbeithon@otpco.com	Otter Tail Power Company	P.O. Box 496 215 South Cascade Street Fergus Falls, MN 565380496	Electronic Service	No	OFF_SL_16-564_Official
Sara	Bergan	sebergan@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_16-564_Official
David F.	Boehm	dboehm@bklawfirm.com	Boehm, Kurtz & Lowry	36 E 7th St Ste 1510 Cincinnati, OH 45202	Electronic Service	No	OFF_SL_16-564_Official
Elizabeth	Brama	ebrama@briggs.com	Briggs and Morgan	2200 IDS Center 80 South 8th Street Minneapolis, MN 55402	Electronic Service	No	OFF_SL_16-564_Official
Jon	Brekke	jbrekke@greenergy.com	Great River Energy	12300 Elm Creek Boulevard Maple Grove, MN 553694718	Electronic Service	No	OFF_SL_16-564_Official
Christina	Brusven	cbrusven@fredlaw.com	Fredrikson Byron	200 S 6th St Ste 4000 Minneapolis, MN 554021425	Electronic Service	No	OFF_SL_16-564_Official
Michael J.	Bull	mbull@mncee.org	Center for Energy and Environment	212 Third Ave N Ste 560 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_16-564_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
David	Cartella	David.Cartella@cliffsnr.com	Cliffs Natural Resources Inc.	200 Public Square Site 3300 Cleveland, OH 44114-2315	Electronic Service	No	OFF_SL_16-564_Official
Greg	Chandler	greg.chandler@upm.com	UPM Blandin Paper	115 SW First St Grand Rapids, MN 55744	Paper Service	No	OFF_SL_16-564_Official
Steve W.	Chriss	Stephen.chriss@walmart.com	Wal-Mart	2001 SE 10th St. Bentonville, AR 72716-5530	Electronic Service	No	OFF_SL_16-564_Official
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1800 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_16-564_Official
Riley	Conlin	riley.conlin@stoel.com	Stoel Rives LLP	33 S. 6th Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_16-564_Official
Lisa	Daniels	lisadaniels@windustry.org	Windustry	201 Ridgewood Ave Minneapolis, MN 55403	Electronic Service	No	OFF_SL_16-564_Official
Ron	Elwood	relwood@mnlisap.org	Mid-Minnesota Legal Aid	2324 University Ave Ste 101 Saint Paul, MN 55114	Electronic Service	No	OFF_SL_16-564_Official
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 55102198	Electronic Service	No	OFF_SL_16-564_Official
Edward	Garvey	garveyed@aol.com	Residence	32 Lawton St Saint Paul, MN 55102	Electronic Service	No	OFF_SL_16-564_Official

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John R.	Gasele	lgasele@fryberger.com	Fryberger Buchanan Smith & Frederick PA	700 Lonsdale Building 302 W Superior St Ste Duluth, MN 55802	Electronic Service	No	OFF_SL_16-564_Official
Bruce	Gerhardson	bgerhardson@otpc.com	Otter Tail Power Company	PO Box 496 215 S Cascade St Fergus Falls, MN 565380496	Electronic Service	No	OFF_SL_16-564_Official
Barbara	Gervais	tofermn@boreal.org	Town of Tofte	P O Box 2293 7240 Tofte Park Road Tofte, MN 55615	Electronic Service	No	OFF_SL_16-564_Official
J Drake	Hamilton	hamilton@fresh-energy.org	Fresh Energy	408 St Peter St Saint Paul, MN 55101	Electronic Service	No	OFF_SL_16-564_Official
Annete	Henkel	mui@mnuutilityinvestors.org	Minnesota Utility Investors	413 Wacouta Street #230 St.Paul, MN 55101	Electronic Service	No	OFF_SL_16-564_Official
Shane	Henriksen	shane.henriksen@enbridge.com	Enbridge Energy Company, Inc.	1409 Hammond Ave FL 2 Superior, WI 54880	Electronic Service	No	OFF_SL_16-564_Official
Lori	Hoyum	lhoyum@mnpower.com	Minnesota Power	30 West Superior Street Duluth, MN 55802	Electronic Service	No	OFF_SL_16-564_Official
James	Jarvi	N/A	Minnesota Ore Operations - U S Steel	P O Box 417 Mountain Iron, MN 55768	Paper Service	No	OFF_SL_16-564_Official
Alan	Jenkins	aj@jenkinsatlaw.com	Jenkins at Law	2265 Roswell Road Suite 100 Marietta, GA 30062	Electronic Service	No	OFF_SL_16-564_Official
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	Yes	OFF_SL_16-564_Official

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Peter	Beithon	pbeithon@otpco.com	Otter Tail Power Company	P.O. Box 496 215 South Cascade Street Fergus Falls, MN 565380496	Electronic Service	No	OFF_SL_16-564_Official
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Kelsey	Johnson	info@taconite.org	Iron Mining Association	324 West Superior St Ste 502 Duluth, MN 55802	Electronic Service	No	OFF_SL_16-564_Official
Richard	Johnson	Rick.Johnson@lawmoss.com	Moss & Barnett	150 S. 5th Street Suite 1200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_16-564_Official
Travis	Kolari	N/A	Keetac	PO Box 217 Keewatin, MN 55753	Paper Service	No	OFF_SL_16-564_Official
Michael	Krikava	mkrikava@briggs.com	Briggs And Morgan, P.A.	2200 IDS Center 80 S 8th St Minneapolis, MN 55402	Electronic Service	No	OFF_SL_16-564_Official
Becky	Lammi	cityclerk@ci.aurora.mn.us	City of Aurora	16 W 2nd Ave N PO Box 160 Aurora, MN 55705	Electronic Service	No	OFF_SL_16-564_Official
David	Langmo	david.langmo@sappi.com	Sappi North America	P O Box 511 2201 Avenue B Cloquet, MN 55720	Electronic Service	No	OFF_SL_16-564_Official
James D.	Larson	james.larson@avantenergy.com	Avant Energy Services	220 S 6th St Ste 1300 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_16-564_Official
Emily	Larson	eLarson@duluthmn.gov	City of Duluth	411 W 1st St Rm 403 Duluth, MN 55802	Electronic Service	No	OFF_SL_16-564_Official
Annie	Levenson Falk	annief@cubminnesota.org	Citizens Utility Board of Minnesota	332 Minnesota Street, Suite W1360 St. Paul, MN 55101	Electronic Service	No	OFF_SL_16-564_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
LeRoger	Lind	llind@yahoo.com	Save Lake Superior Association	P.O. Box 101 Two Harbors, MN 55616	Electronic Service	No	OFF_SL_16-564_Official
Patrick	Loupin	PatrickLoupin@Packaging Corp.com	Packaging Corporation of America	PO Box 990050 Boise, ID 83799-0050	Electronic Service	No	OFF_SL_16-564_Official
Susan	Ludwig	sludwig@mnpower.com	Minnesota Power	30 West Superior Street Duluth, MN 55802	Electronic Service	No	OFF_SL_16-564_Official
Kavita	Maini	kmairi@wi.rr.com	KM Energy Consulting, LLC	961 N Lost Woods Rd Oconomowoc, WI 53066	Electronic Service	No	OFF_SL_16-564_Official
Sarah	Manchester	sarah.manchester@sappi.com	Sappi North American	255 State Street Floor 4 Boston, MA 02109-2617	Electronic Service	No	OFF_SL_16-564_Official
Tony	Mancuso	mancusot@stlouiscountymn.gov	Saint Louis County Property Mgmt Dept	Duluth Courthouse 100 N 5th Ave W Rm 515 Duluth, MN 55802-1209	Electronic Service	No	OFF_SL_16-564_Official
Pam	Marshall	pam@energycents.org	Energy CENTS Coalition	823 7 h St E St. Paul, MN 55106	Electronic Service	No	OFF_SL_16-564_Official
Keith	Matzdorf	keith.matzdorf@sappi.com	Sappi Fine Paper North America	PO Box 511 2201 Avenue B Cloquet, MN 55720	Electronic Service	No	OFF_SL_16-564_Official
Daryl	Maxwell	dmaxwell@hydro.mb.ca	Manitoba Hydro	360 Portage Ave FL 16 PO Box 815, Station Main Winnipeg, Manitoba R3C 2P4 Canada	Electronic Service	No	OFF_SL_16-564_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Matthew	McClincy	MMcClincy@usg.com	USG	35 Arch Street Clouget, MN 55720	Electronic Service	No	OFF_SL_16-564_Official
Craig	McDonnell	Craig.McDonnell@state.mn.us	MN Pollution Control Agency	520 Lafayette Road St. Paul, MN 55101	Electronic Service	No	OFF_SL_16-564_Official
Natalie	McIntire	natalie.mcintire@gmail.com	Wind on the Wires	570 Asbury St Ste 201 Saint Paul, MN 55104-1850	Electronic Service	No	OFF_SL_16-564_Official
Herbert	Minke	hminke@allete.com	Minnesota Power	30 W Superior St Duluth, MN 55802	Electronic Service	No	OFF_SL_16-564_Official
David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022093	Electronic Service	No	OFF_SL_16-564_Official
Andrew	Moratzka	andrew.moratzka@stbel.com	Stoel Rives LLP	33 South Sixth St Ste 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_16-564_Official
David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency	220 South Sixth Street Suite 1300 Minneapolis, Minnesota 55402	Electronic Service	No	OFF_SL_16-564_Official
Michael	Noble	noble@fresh-energy.org	Fresh Energy	Hamm Bldg., Suite 220 408 St. Peter Street St. Paul, MN 55102	Electronic Service	No	OFF_SL_16-564_Official
Rolf	Nordstrom	rnordstrom@gpisd.net	Great Plains Institute	2801 21ST AVE S STE 220 Minneapolis, MN 55407-1229	Electronic Service	No	OFF_SL_16-564_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Kate	O'Connell	kate.oconnell@state.mn.us	Department of Commerce	Suite 50085 Seventh Place East St. Paul, MN 551012198	Electronic Service	No	OFF_SL_16-564_Official
Elanne	Palcich	epalcich@cpinternet.com	Save Our Sky Blue Waters	P.O. Box 3661 Duluth, MN 55803	Electronic Service	No	OFF_SL_16-564_Official
Max	Peters	maxp@cohasset-mn.com	City of Cohasset	305 NW First Ave Cohasset, MN 55721	Electronic Service	No	OFF_SL_16-564_Official
Jennifer	Peterson	jjpeterson@mnpower.com	Minnesota Power	30 West Superior Street Duluth, MN 55802	Electronic Service	No	OFF_SL_16-564_Official
William	Phillips	wphillips@aarp.org	AARP	30 E. 7th St Suite 1200 St. Paul, MN 55101	Electronic Service	No	OFF_SL_16-564_Official
Tolaver	Rapp	Tolaver.Rapp@cliffsnr.com	Cliffs Natural Resources	200 Public Square Suite 3400 Cleveland, OH 441142318	Electronic Service	No	OFF_SL_16-564_Official
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_16-564_Official
Ralph	Riberich	rriberich@uss.com	United States Steel Corp	600 Grant St Ste 2028 Pittsburgh, PA 15219	Electronic Service	No	OFF_SL_16-564_Official
Buddy	Robinson	buddy@citizenstfed.org	Minnesota Citizens Federation NE	2110 W. 1st Street Duluth, MN 55806	Electronic Service	No	OFF_SL_16-564_Official
Santi	Romani	N/A	United Taconite	P O Box 180 Eveleth, MN 55734	Paper Service	No	OFF_SL_16-564_Official

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Susan	Romans	sromans@allete.com	Minnesota Power	30 West Superior Street Legal Dept Duluth, MN 55802	Electronic Service	No	OFF_SL_16-564_Official
Richard	Savelkoul	rsavelkoul@martinsquires.com	Martin & Squires, P.A.	332 Minnesota Street Ste W2750 St. Paul, MN 55101	Electronic Service	No	OFF_SL_16-564_Official
Thomas	Scharff	thomas.scharff@versoco.com	Verso Corp	600 High Street Wisconsin Rapids, WI 54495	Electronic Service	No	OFF_SL_16-564_Official
Larry L.	Schedin	Larry@LLSResources.com	LLS Resources, LLC	332 Minnesota St, Ste W1390 St. Paul, MN 55101	Electronic Service	No	OFF_SL_16-564_Official
Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates	7400 Lyndale Ave S Ste 190 Richfield, MN 55423	Electronic Service	No	OFF_SL_16-564_Official
Doug	Shoemaker	dougs@charter.net	Minnesota Renewable Energy	2928 5th Ave S Minneapolis, MN 55408	Electronic Service	No	OFF_SL_16-564_Official
Brett	Skyles	Brett.Skyles@co.itasca.mn.us	Itasca County	123 NE Fourth Street Grand Rapids, MN 557442600	Electronic Service	No	OFF_SL_16-564_Official
Joshua	Smith	joshua.smith@sierraclub.org		85 Second St FL 2 San Francisco, California 94105	Electronic Service	No	OFF_SL_16-564_Official
Richard	Staffon	rcstaffon@msn.com	W. J. McCabe Chapter, Izaak Walton League of America	1405 Lawrence Road Cloquet, Minnesota 55720	Electronic Service	No	OFF_SL_16-564_Official

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James M	Strommen	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered	200 S 6th St Ste 470 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_16-564_Official
Eric	Swanson	eswanson@winthrop.com	Winthrop & Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_16-564_Official
Lynnette	Sweet	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_16-564_Official
Robert	Tammen	bobtammen@frontiernet.net	Wetland Action Group	PO Box 398 Soudan, MN 55782	Electronic Service	No	OFF_SL_16-564_Official
Jim	Tieberg	jtieberg@polymetmining.com	PolyMet Mining, Inc.	PO Box 475 County Highway 666 Hoyt Lakes, MN 55750	Electronic Service	No	OFF_SL_16-564_Official
Jessica	Tritsch	jessica.tritsch@sierraclub.org	Sierra Club	2327 E Franklin Ave Minneapolis, MN 55406	Electronic Service	No	OFF_SL_16-564_Official
Karen	Tumboom	karen.tumboom@versocom.com	Verso Corporation	100 Central Avenue Duluth, MN 55807	Electronic Service	No	OFF_SL_16-564_Official
Kevin	Walli	kwalli@fryberger.com	Fryberger, Buchanan, Smith & Frederick	380 St. Peter St Ste 710 St. Paul, MN 55102	Electronic Service	No	OFF_SL_16-564_Official
Daniel P	Wolf	dan.wolf@state.mn.us	Public Utilities Commission	121 7th Place East Suite 350 St. Paul, MN 5510212147	Electronic Service	Yes	OFF_SL_16-564_Official
Scott	Zahorik	scottzahorik@aeoa.org	Arrowhead Economic Opportunity Agency	702 S. 3rd Avenue Virginia, MN 55792	Electronic Service	No	OFF_SL_16-564_Official