

May 19, 2022

Will Seuffert
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. E015/M-22-130

Dear Mr. Seuffert:

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

Minnesota Power's 2021 Conservation Improvement Program Consolidated Filing.

The Petition was filed on April 1, 2022 by:

Analeisha Vang
Senior Public Policy Advisory
Minnesota Power
30 West Superior Street
Duluth, MN 53802

The Department recommends that, pending the receipt of additional information, the Minnesota Public Utilities Commission (Commission) **approve Minnesota Power's Petition**. The Department is available to answer any questions that the Commission may have in this matter.

Sincerely,

/s/ MICHAEL N. ZAJICEK
Rates Analyst

MNZ/ja
Attachment



Before the Minnesota Public Utilities Commission

Comments of the Minnesota Department of Commerce Division of Energy Resources

Docket No. E015/M-22-130

I. SUMMARY OF THE UTILITY'S PROPOSAL

On April 1, 2022, Minnesota Power (MP or the Company) submitted its annual Conservation Improvement Program (CIP) Consolidated Filing (*Report* or *Petition*) for 2021 with the Minnesota Public Utilities Commission (Commission) in Docket No. E015/M-22-130. In its *Petition*, MP requested that the Commission approve:

- A Shared Savings Demand Side Management (DSM) financial incentive of \$1,937,003 for MP's 2021 CIP achievements;
- 2021 CIP tracker account activity, resulting in a year-end 2021 balance of \$3,583,333;
- A CIP tracker carrying charge rate of 0.2917 percent;
- A 2022/2023 Conservation Program Adjustment factor of \$0.002002/kWh for bills rendered on and after July 1, 2022; and
- A variance of Minn. Rules 7820.3500 and 7825.2600 to permit MP's continued combination of the Conservation Program Adjustment with the Fuel and Purchased Power Clause Adjustment on customer bills.

The Company also filed its 2021 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, that portion of the *Petition* has been assigned to a separate docket.¹

II. COMMISSION'S 2021 ORDER

On September 7, 2021, the Commission issued its *Order* approving MP's 2019 Consolidated CIP filings,² with the following determinations:

1. Approved Minnesota Power's 2020 Conservation Improvement Program (CIP) tracker account, as summarized in Table 1 of the Department of Commerce comments, with a December 31, 2020 tracker balance of (\$380,309.59).
2. Approved Minnesota Power's new monthly carrying charge rate of 0.2917 percent.

¹ See Docket No. E015/CIP-20-476.01

² See Commission's August 18, 2020 *Order* in Docket No. E015/M-20-428.

3. Approved a 2021/2022 Conservation Program Adjustment (CPA) of (\$0.002015) per kWh, to be effective July 1, 2021, or on the first billing cycle in the next full month after Commission approval, whichever is later.
4. Approved a Demand Side Management financial incentive of \$2,411,672 for Minnesota Power's 2020 CIP achievements, to be included in the Company's CIP tracker account no sooner than the issue date of this Order.
5. Granted Minnesota Power a variance to Minnesota Rules part 7820.3500 (K) and a variance to Minnesota Rules part 7825.2600 until issuance of the Commission's Order establishing MP's 2020/2021 CPA.
6. Required Minnesota Power to submit a compliance filing, within 10 days of the issue date of that Order, with revised tariff sheets reflecting the Commission's determinations in this matter.

On September 17, 2021, MP submitted its compliance tariff sheets in response to Order Point 6.

III. DEPARTMENT ANALYSIS

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

- in Section III.A, Minnesota Power's proposed 2021 Shared Savings DSM financial incentive;
- in Section III.B, MP's proposed reconciliation for its 2021 CIP tracker account;
- in Section III.C, Minnesota Power's proposed CPA for 2022/2023;
- in Section III.D, Minnesota Power's request for a waiver from Minnesota Rules part 7820.3500 (K) and Minnesota Rules part 7825.2600 and its proposed notice of the rate increase; and
- in Section III.E, MP's historical CIP achievements and incentives, 2007-2021.

A. MINNESOTA POWER'S PROPOSED FINANCIAL INCENTIVE FOR 2021 CIP ACHIEVEMENTS

1. Background and Summary of MP's Proposed DSM Incentive for 2021 Achievements

The Commission approved a modified Shared Savings DSM financial incentive mechanism in its August 5, 2016, *Order Adopting Modifications to Shared Savings Demand-Side Management Financial Incentive Plan*, Docket No. E,G999/CI-08-133. The new mechanism, which began January 1, 2017, is triggered when electric utilities achieve energy savings of 1 percent, and gas utilities achieve 0.7 percent, of the utility's most recent three-year average of weather-normalized retail sales.³ That *Order* covered years 2017-2019, and in a different *Order*, the Commission extended the 2019 parameters to 2020.⁴ On December 9, 2020, the Commission approved the parameters for the Shared Savings

³ Excluding retail sales to customers who are owners of a large customer facility and have been granted an exemption by the Department's Commissioner under Minnesota Statutes 216B.241, subd. 1a(b).

⁴ *Order Extending Existing Incentive Formula and Encouraging Discussions for Future Revisions*. February 20, 2020, Docket No. E,G999/CI-08-133.

financial incentive mechanism covering the 2021-2023 CIP triennia (*December 9th Order*).⁵ The Commission capped electric and gas incentives at 10 percent of net benefits and 30 percent of expenditures. The December 9th Order approved an expenditure cap of 35 percent if electric utilities meet or exceed energy savings of 2 percent and gas utilities 1.2 percent of retail sales. For more details about the December 9th Order, see Attachment A.

MP reported that its 2021 achievements resulted in energy savings of 74,539,041 kWh, approximately 2.82% of retail sales, and demand savings of 6,831 kW. Together the 2021 energy and demand savings resulted in \$19,370,032 of net benefits.⁶ Based on the terms and conditions of its approved Shared Savings DSM financial incentive plan, Minnesota Power requested recovery of a DSM financial incentive of \$1,937,003 for 2021, which the Company calculated by multiplying the Net benefits cap of 10 percent by the net benefits of \$19,370,032. Minnesota Power's proposed incentive is equal to approximately 21.1% (\$1,937,003/\$9,161,598) of the Company's 2021 expenditures.

2. *The Department's Review of MP's Proposed 2020 DSM Incentive*

Minnesota Power estimated that its 2021 performance should result in a Shared Savings DSM financial incentive of \$1,937,003.

The Department's technical analysis of the demand and energy savings that underpin MP's proposed Shared Savings 2021 DSM financial incentive of \$1,937,003 is ongoing and will not be completed before the instant comments are due. The existence of this lag between the Company's request for recovery of the incentive and the completion of the Department's engineering review is a recurring phenomenon.

In 2021, the Department compensated for this lag by simply assuming Minnesota Power's claimed energy savings for 2020 were correct as filed, with the intent to make, in the instant filing, any adjustments approved by the Deputy Commissioner of the Department. However, the Deputy Commissioner approved Minnesota Power's 2021 Status Report, covering 2020 CIP activity, without any adjustments in Docket No. E015/CIP-16-117.04,⁷ and thus none are required in this docket.

In the event that the Deputy Commissioner of the Department approves different 2021 CIP energy savings or budget, the Commission can approve any adjustments to the Company's DSM financial incentive for 2021 achievements as part of the Company's 2022 filing, due April 1, 2023.

⁵ E017/M-21-228 November 15, 2021 *Order*

⁶ Calculations of Net Benefits are shown on Page 61 of the *Petition*. MP notes that Order Points 1 and 2 from the Commission's July 16, 2013 *Order Determining Ratemaking Treatment of Utility CIP Project Costs* (Docket No. E,G999/DI-12-1342), net benefits and energy savings resulting from MP facilities projects are excluded for the purpose of the financial incentive calculation. There were no MP facilities projects in 2021 so no adjustments were required.

⁷ Approved by the Department on July 8, 2021.

The Department's review indicates that the Company correctly calculated its DSM financial incentive for 2021 CIP achievements; therefore, the Department recommends that the Commission approve MP's 2021 Shared Savings financial incentive of \$1,937,003.

B. MINNESOTA POWER'S PROPOSED 2021 CIP TRACKER ACCOUNT

In its *Petition*, Minnesota Power requested approval of its report on recoveries and expenditures included in the Company's CIP tracker account balance during 2021. Activity in MP's CIP tracker account during 2021 is summarized below in Table 1.

Table 1: A Summary of MP's 2021 CIP Tracker Account

| Line No. | Description | Time Period | Amount |
|----------|---|-------------------------------------|---------------|
| 1 | Beginning Balance | January 1, 2021 | (\$380,309) |
| 2 | CIP Expenses | January 1 through December 31, 2021 | \$9,331,962 |
| 3 | DSM Financial Incentive | Approved in 2021 for 2020 | \$2,411,672 |
| 4 | CIP Expenses Subtotal [Line 2 + Line 3] | January 1 through December 31, 2021 | \$11,743,634 |
| 5 | Base Rate Cost Recovery | January 1 through December 31, 2021 | (\$8,360,767) |
| 6 | Carrying Charges Recovered | | \$0 |
| 7 | Conservation Program Adjustment Recovery | January 1 through December 31, 2021 | \$564,638 |
| 8 | CIP Recoveries Subtotal [Line 5 + Line 6 + Line 7 + Line 8] | January 1 through December 31, 2021 | (\$7,796,129) |
| 9 | Monthly Carrying Charges | January 1 through December 31, 2021 | \$16,137 |
| 10 | Ending Balance [Line 1 + Line 4 + Line 8 + Line 9] | December 31, 2021 | \$3,583,333 |

The Department reviewed MP's CIP tracker account for 2021 and concludes that the Company correctly calculated its CIP tracker account for 2021, resulting in a year-end balance of \$3,583,333.

C. MINNESOTA POWER'S PROPOSED UPDATED CPA AND MONTHLY CHARGE RATE

The Commission approved MP's CPA (Conservation Program Adjustment) of (\$0.000817) per kWh on August 28, 2020 in Docket No. E015/M-20-428.

On pages 16-17 of its instant filing, MP stated:

The CIP Tracker Account balance at year-end 2020 reflects the result of prior activity in Tracker 2, as indicated on page 1 of Exhibit 1. However, for CPA purposes, the 2020 year-end balance requires adjustments to properly calculate the proposed CPA factor. Using the new fiscal year approach, these factors have been expanded to include actual and anticipated expenditures and cost recovery through base rates (CCRC) and the current CPA rate for the remainder of the current CPA period (January 2021–June 2021) as well as anticipated financial incentives, anticipated CIP expenditures and anticipated cost recovery through base rates for the new CPA period (July 2021–June 2022). The fiscal year approach is designed to achieve a zero Tracker balance at the end of the CPA period (fiscal year) rather than at the end of the calendar year. Higher (calendar) year-end Tracker balances should therefore be anticipated going forward which is a deviation from Minnesota Power's recent history of low year-end Tracker balances. Minnesota Power notes that actual program performance, expenditures and sales will lead to tracker balance fluctuation.

For July 2020 through June 2021, Minnesota Power proposed an increased surcharge of \$0.002015 per kWh, or a \$0.002832 per kWh increase from the Company's 2020/2021 CPA of (\$0.000817) per kWh.

Table 2 below delineates the Company's calculation of its 2021/2022 CPA.

Table 2: MP's 2022/2023 Conservation Program Adjustment Calculation⁸

| Line No. | Description | Jan 2021-June 2021 | July 2021-June 2022 |
|----------|--|--------------------|---------------------|
| 1 | CIP Tracker Account balance | \$3,583,333 | \$1,000,840 |
| 2 | Financial Incentives for 2020 Activity | N/A | \$1,937,003 |
| 3 | CIP Current Year Expenditures (actuals, Jan-Feb) | \$4,538,978 | \$10,805,130 |
| 4 | CIP Expenses Subtotal [Line 2 + Line 3] | \$4,538,978 | \$12,742,133 |
| 5 | CIP Costs Recovered Through Base Rates (actuals, Jan-Feb) | (\$4,431,953) | (\$8,552,214) |
| 6 | CIP Cost Recovery through current CPA (actuals, Jan-Feb) | (\$2,702,006) | N/A |
| 7 | CIP Recoveries Subtotal [Line 5 + Line 6] | (\$7,133,959) | (\$8,552,214) |
| 8 | Carrying Charges | \$12,488 | N/A |
| 9 | Recoverable CIP Tracker Balance [Line 1 + Line 4 + Line 7 + Line 8] | \$1,000,840 | \$5,190,759 |
| 10 | CPA per kWh = \$5,190,759/2,592,283,000 kWh | | \$0.002002 |

MP derived its proposed 2022/2023 CPA by dividing the recoverable CIP tracker balance projected for June 30, 2022 (fourth column of line 9) by the kilowatt hour sales subject to CIP over the corresponding period (2,592,283,000 kWh, see line 10). The result is the \$0.002002/kWh CPA that the Company proposed.

Order Point 4 of the Commission's Order in Docket No. E015/M-15-80 required the Company to calculate the carrying charge on its CIP tracker account using the rate from its multi-year credit facility, effective upon the Commission's Order of September 16, 2015. Exhibit 1, page 5 of MP's filing shows that the Company proposed to maintain its monthly carrying charge rate of 0.2917 percent to be used for the 2022/2023 CPA. The Department concludes that MP correctly calculated its monthly carrying charge rate of 0.2917 percent.

The Department recommends that the Commission approve MP's proposed 2022/2023 CPA of \$0.002002/kWh.

E. MP'S ANNUAL REQUEST FOR VARIANCES FROM COMMISSION RULES

Minnesota Power requested renewal of two variances:

- a variance from Minnesota Rules part 7820.3500 (K), which requires the Fuel Clause Adjustment (FCA) to be listed on customers' bills as a separate line item; and

⁸ For charges in Lines 3, 5, and 6 (CIP expenditures, CIP base rate recoveries, and CPA recoveries), the Company used actual figures for January and February of 2021, and estimated figures for March 2021 through June 2022.

- a variance from Minnesota Rules part 7825.2600, which states that the FCA should be stated on a per-kWh basis on customer bills.

MP indicated that it seeks a variance of these two rules so that the Company may calculate the CIP adjustment rate on a per-kilowatt-hour basis, and combine the FCA and CIP adjustment rate on one bill line-item called a “Resource Adjustment.”

Minnesota Rules part 7829.3200 authorizes the Commission to grant a variance to its rules when:

- enforcement of the rule would impose an excessive burden upon the applicant or others affected by the rule;
- granting the variance would not adversely affect the public interest; and
- granting the variance would not conflict with standards imposed by law.

The Department concludes that the criteria for granting the requested variances are met as follows:

- Excessive Burden: MP has been using the combined Resource Adjustment for several years. While this approach certainly can be changed if the Commission desires, requiring a change now, for an adjustment to go in effect soon, would create an administrative burden that is excessive.
- Public Interest: The variance would not adversely affect the public interest and could avoid confusion that might result from changing the presentation on bills at this time.
- Standards Imposed by Law: The separate line item requirement is created by Commission rule, and is not required by statute. Therefore, the requirement may be varied pursuant to Minnesota Rules pt. 7829.3200.

Therefore, the Department recommends that the Commission approve the variances requested by the Company.

F. HISTORY OF MINNESOTA POWER’S CIP ACHIEVEMENTS AND FINANCIAL INCENTIVES 2007-2021

In Attachment B, the Department presents a historical comparison of MP’s CIP activity for the period 2007 through 2021. The attachment provides an indication of how the Company’s energy and demand savings, CIP expenditures, Shared Savings financial incentive, carrying charges, and year-end tracker balance changed during the period. Select statistics from Attachment B, Table 1 are presented in the following table:

Table 3: Savings, Expenditures, and Incentives for Select Years, 2008-2021

| | Energy Savings (kWh) | Demand Savings (kW) | CIP Expenditures | Shared Savings Incentive |
|---|----------------------|---------------------|------------------|--------------------------|
| 2021 | 75,539,041 | 6,831 | \$9,161,598 | \$1,937,003 |
| 2020 | 70,774,076 | 6,811 | \$8,205,771 | \$2,411,672 |
| Average 2019-2021 | 71,327,446 | 7,327 | \$8,549,381 | \$2,234,132 |
| Average 2008-2010 | 54,082,078 | 6,398 | \$5,314,880 | \$2,764,163 |
| Compare 2021 to 2020 | 6.73% | 0.29% | 11.65% | -19.68% |
| Compare 2021 to Avg 2019-2021 | 5.90% | -6.77% | 7.16% | -13.30% |
| Compare Avg. 2019-2021 to Avg 2008-2010 | 31.89% | 14.51% | 60.86% | -19.18% |

Table 3 shows that in 2021:

- First-year energy savings were approximately 6.73 percent higher than the Company's 2020 energy savings;
- Demand savings were 0.29 percent higher than the Company's 2020 demand savings; and
- Compared to ten years ago, average energy savings, demand savings, and CIP expenditures have all increased, while the incentive has decreased.

III. RECOMMENDATIONS

The Department recommends that the Commission:

1. Approve Minnesota Power's 2021 CIP tracker account, as summarized in Table 1 above, with a December 31, 2021 tracker balance \$3,583,333.
2. Approve MP's monthly carrying charge rate of 0.2917 percent;
3. Approve a 2022/2023 CPA of \$0.002002 per kWh, to be effective July 1, 2022, or on the first billing cycle in the next full month after Commission approval, whichever is later.
4. Approve a DSM financial incentive of \$1,937,003 for Minnesota Power's 2021 CIP achievements, 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;

5. Grant Minnesota Power a variance to Minnesota Rules part 7820.3500 (K) and a variance to Minnesota Rules part 7825.2600 until issuance of the Commission's *Order* establishing MP's 2021/2022 CPA;
6. Require Minnesota Power to submit a compliance filing, within 10 days of the issue date of the Order in the present docket, with revised tariff sheets reflecting the Commission's determinations in this matter.

Attachment A

The December 9, 2020, Order (December 9, 2020)

Docket No. E,G999/CI-08-133

- A. For electric utilities, the 2021 -2023 triennium plan is as follows:
 - 1) Authorize financial incentives for a utility that achieves energy savings of at least 1.0 percent of the utility's retail sales.
 - 2) For a utility that achieves energy savings equal to 1.0 percent of retail sales, award the utility a share of the net benefits as set forth in Attachment A.
 - 3) For each additional 0.1 percent of energy savings, the utility achieves, increase the net benefits awarded to the utility by an additional 0.75 percent until the utility achieves savings of 1.7 percent of retail sales.
 - 4) For savings levels of 1.7 percent and higher, award the utility a share of the net benefits equal to the Net Benefits Cap.
 - 5) Electric utilities may exceed the 30% CIP Expenditures Cap, up to a maximum of 35%, if they meet or exceed energy savings equaling 2% of retail sales.
- B. For Gas utilities, the 2021 -2023 triennium plan is as follows:
 - 1) Authorize financial incentives for a utility that achieves energy savings of at least
 - 2) 1.0 percent of the utility's retail sales.
 - 3) For a utility that achieves energy savings equal to 0.7 percent of retail sales, award the utility a share of the net benefits as set forth in Attachment A.
 - 4) For each additional 0.1 percent of energy savings, the utility achieves, increase the net benefits awarded to the utility by an additional 0.75 percent until the utility achieves savings of 1.2 percent of retail sales.
 - 5) For savings levels of 1.2 percent and higher, award the utility a share of the net benefits equal to the Net Benefits Cap.
 - 6) Gas utilities may exceed the 30% CIP Expenditures Cap, up to a maximum of 35%, if they meet or exceed energy savings equaling 1.2% of retail sales.
- C. For all utilities, set the following Net Benefit Caps:
 - 1) 13.5 percent in 2017,
 - 2) 12.0 percent in 2018,
 - 3) 10.0 percent in 2019, and
 - 4) 10.0 percent in 2020.
- D. For all utilities, set the following Conservation Improvement Plan (CIP) Expenditure Caps:
 - 1) 40 percent in 2017,
 - 2) 35 percent in 2018,
 - 3) 30 percent in 2019, and
 - 4) 30 percent in 2020.

The Commission retains certain provisions from the current Shared Savings DSM Financial Incentive Plan, with slight modifications, as follows:

- CIP-exempt customers shall not be allocated costs for the new shared savings incentive. Sales to CIP-exempt customers shall not be included in the calculation of utility energy savings goals.
- If a utility elects not to include a third-party CIP project, the utility cannot change its election until the beginning of subsequent years.
- If a utility elects to include a third-party project, the project's net benefits and savings will be included in the calculation of the energy savings and will count toward the 1.5 percent savings goal.
- The energy savings, cost, and benefits of modifications to non-third-party projects will be included in the calculation of a utility's DSM incentive.
- The costs of any mandated, non-third-party projects (e.g., the 2007 Next Generation Energy Act assessments,⁹ University of Minnesota Initiative for Renewable Energy and the Environment costs¹⁰) shall be excluded from the calculation of net benefits and energy savings achieved and incentive awarded.
- Costs, energy savings, and energy production related to Electric Utility Infrastructure Costs¹¹, solar installation¹² and biomethane purchases¹³ shall not be included in energy savings for DSM financial incentive purposes.
- The Commission requests that the Department continue a stakeholder process, under the current docket, to evaluate ways of improving the shared-savings mechanisms for potential adoption in the 2024–2026 triennium including, but not limited to, discussion of:
 - a. Incorporation of lifetime energy savings into the incentive mechanism,
 - b. Incorporation of an incentive for utilities that achieve permanent peak reductions through the shared-savings incentive mechanism,
 - c. Comparison of alternative mechanisms, along with the approved 2021-2023 CIP financial incentive mechanism, to each other and to how a similar-sized (in terms of cost) supply-side investment would be rewarded financially through the cost-of-service model, and
 - d. Energy efficiency opportunities to support increased load flexibility (the ability to persistently shape and shift load).

The new Shared Savings DSM Incentive Plan shall be in effect for 2021 - 2023.

⁹ See 2007 Laws, art. 2

¹⁰ *Id.*, § 3, subd. 6.

¹¹ Minn. Stat. § 216B.1636

¹² Minn. Stat. § 216B.241, subd. 5a.

¹³ *Id.*, subd. 5b.

Utilities may discontinue the annual February 1 compliance filing because a scale of net benefits will no longer be required since the Department's proposal sets percentages at certain savings thresholds and calibrates the mechanism to dollars per unit of energy.

Attachment B, Table 1:

| Line No. | 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 | 9 | 10 | 11 | 12 | 13 | 14 | 15 |
|----------|-------------------------------|---------------------|------------------|--------------|-------------------------|------------------|--------------------------|-------------------------|----------------------------|---|--|--------------------------------------|----------------------------------|---|---|
| Year | Achieved Energy Savings (kWh) | Demand Savings (kw) | CIP Expenditures | Net Benefits | DSM Financial Incentive | Carrying Charges | Year-End Tracker Balance | Normalized Retail Sales | Average cost per kWh Saved | Average cost per kWh Saved (including incentives) | Energy savings as a % of Normalized Retail Sales | Incentive as a % of CIP Expenditures | Incentive as a % of Net Benefits | Carrying Charges as a % of Expenditures | Year-End Tracker Balance as a % of Expenditures |
| 2007 | 44,168,014 | 4,842 | \$3,908,223 | \$13,617,215 | \$349,334 | \$37,945 | \$1,188,103 | 3,290,729,000 | \$0.09 | \$0.10 | 1.34% | 9% | 3% | 1% | 30% |
| 2008 | 48,845,282 | 5,644 | \$4,826,410 | \$18,669,840 | \$607,169 | \$100,453 | \$1,870,428 | 3,339,743,000 | \$0.10 | \$0.11 | 1.46% | 13% | 3% | 2% | 39% |
| 2009 | 52,897,732 | 6,378 | \$5,483,230 | \$23,391,755 | \$878,709 | \$97,222 | \$1,613,335 | 3,298,723,333 | \$0.10 | \$0.12 | 1.60% | 16% | 4% | 2% | 29% |
| 2010 | 60,503,220 | 7,173 | \$5,635,000 | \$29,675,047 | \$6,806,612 | \$42,425 | \$662,926 | 3,298,723,333 | \$0.09 | \$0.21 | 1.83% | 121% | 23% | 1% | 12% |
| 2011 | 69,091,422 | 7,455 | \$6,295,187 | \$16,611,526 | \$7,772,785 | (\$62,643) | \$4,603,612 | 3,275,924,984 | \$0.09 | \$0.20 | 2.11% | 123% | 47% | 1% | 73% |
| 2012 | 63,159,196 | 8,132 | \$6,813,817 | \$16,543,789 | \$7,105,410 | \$87,535 | \$4,337,461 | 3,275,924,984 | \$0.11 | \$0.22 | 1.93% | 104% | 43% | 1% | 64% |
| 2013 | 77,630,645 | 5,724 | \$6,405,828 | \$17,757,678 | \$8,733,448 | (\$55,657) | (\$495,816) | 3,070,846,984 | \$0.08 | \$0.20 | 2.53% | 136% | 49% | 1% | 8% |
| 2014 | 76,338,363 | 9,215 | \$7,200,833 | \$20,792,339 | \$6,237,702 | (\$157,343) | (\$1,116,332) | 3,013,600,651 | \$0.09 | \$0.18 | 2.53% | 87% | 30% | 2% | 16% |
| 2015 | 85,447,344 | 7,226 | \$6,554,551 | \$29,636,057 | \$7,476,643 | (\$210,949) | (\$2,649,748) | 3,013,600,651 | \$0.08 | \$0.16 | 2.84% | 114% | 25% | 3% | 40% |
| 2016 | 63,182,840 | 9,489 | \$7,515,866 | \$22,997,984 | \$5,528,499 | \$210,949 | \$4,029,104 | 3,005,239,746 | \$0.12 | \$0.21 | 2.10% | 74% | 24% | 3% | 54% |
| 2017 | 72,372,163 | 8,594 | \$8,129,337 | \$22,184,003 | \$2,994,840 | \$88,914 | \$3,315,558 | 2,749,752,960 | \$0.11 | \$0.15 | 2.63% | 37% | 13% | 1% | 41% |
| 2018 | 72,479,534 | 8,096 | \$9,031,446 | \$23,167,277 | \$2,780,073 | (\$13,336) | (\$1,519,260) | 2,749,752,960 | \$0.12 | \$0.16 | 2.64% | 31% | 12% | 0% | 17% |
| 2019 | 67,669,222 | 8,338 | \$8,280,773 | \$23,537,199 | \$2,353,720 | (\$192,344) | (\$5,384,063) | 2,749,752,960 | \$0.12 | \$0.16 | 2.46% | 28% | 10% | 2% | 65% |
| 2020 | 70,774,076 | 6,811 | \$8,205,771 | \$24,762,646 | \$2,411,672 | (\$136,551) | (\$380,310) | 2,749,752,960 | \$0.12 | \$0.15 | 2.57% | 29% | 10% | 2% | 5% |
| 2021 | 75,539,041 | 6,831 | \$9,161,598 | \$19,370,032 | \$1,937,003 | \$16,137 | \$3,583,333 | 2,646,854,358 | \$0.12 | \$0.15 | 2.85% | 21% | 10% | 0% | 39% |

CERTIFICATE OF SERVICE

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

MINNESOTA DEPARTMENT OF COMMERCE

COMMENTS

Docket No. E015/M-22-130

Dated this **19th** day of May 2022.

/s/Marcella Emeott

[illegible]

| First Name | Last Name | Email | Company Name | Address | Delivery Method | View Trade Secret | Service List Name |
|------------|-----------|------------------------------------|--|--|--------------------|-------------------|----------------------------------|
| Charles | Drayton | charles.drayton@enbridge.com | Enbridge Energy Company, Inc. | 7701 France Ave S Ste 600 Edina, MN 55435 | Electronic Service | No | SPL_SL__CIP SPECIAL SERVICE LIST |
| Jim | Erchul | jerschul@dbnhs.org | Daytons Bluff Neighborhood Housing Sv. | 823 E 7th St St. Paul, MN 55106 | Electronic 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 280 Saint Paul, MN 551012198 | Electronic Service | No | SPL_SL__CIP SPECIAL SERVICE LIST |
| Karolanne | Foley | Karolanne.foley@dairylandpower.com | Dairyland Power Cooperative | PO Box 817 La Crosse, WI 54602-0817 | Electronic Service | No | SPL_SL__CIP SPECIAL SERVICE LIST |
| Rob | Friend | rfriend@mnychamber.com | Minnesota Chamber of Commerce - MN Waste Wise Foundation | 400 Robert St N Ste 1500 Saint Paul, MN 55101 | Electronic Service | No | SPL_SL__CIP SPECIAL SERVICE LIST |
| Jenny | Glumack | jenny@mrea.org | Minnesota Rural Electric Association | 11640 73rd Ave N Maple Grove, MN 55369 | Electronic Service | No | SPL_SL__CIP SPECIAL SERVICE LIST |
| Angela E. | Gordon | agordon@trccompanies.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 |

| First Name | Last Name | Email | Company Name | Address | Delivery Method | View Trade Secret | Service List Name |
|------------|-----------|---|--|---|--------------------|-------------------|-------------------------------------|
| Jason | Grenier | jgrenier@otpc.com | Otter Tail Power Company | 215 South Cascade Street Fergus Falls, MN 56537 | Electronic Service | No | SPL_SL__CIP SPECIAL SERVICE LIST |
| Jeffrey | Haase | jhaase@grenergy.com | Great River Energy | 12300 Elm Creek Blvd Maple Grove, MN 55369 | 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 |
| Tyler | Hamman | tylerh@bepc.com | Basin Electric Power Cooperative | 1717 E Interstate Ave Bismarck, ND 58501 | 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 | jared.hendricks@owatonna utilities.com | Owatonna Municipal Public Utilities | PO Box 800 208 S Walnut Ave Owatonna, MN 55060-2940 | Electronic Service | No | SPL_SL__CIP SPECIAL SERVICE LIST |
| Joe | Hoffman | ja.hoffman@smmpa.org | SMMPA | 500 First Ave SW Rochester, MN 55902-3303 | 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 |
| Deborah | Knoll | dknoll@mnpower.com | Minnesota Power | 30 W Superior St Duluth, MN 55802 | 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 |
|------------|------------|------------------------------------|--|--|--------------------|-------------------|-------------------------------------|
| 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 |
| Erica | Larson | erica.larson@centerpointenergy.com | CenterPoint Energy | 505 Nicollet Avenue P.O. Box 59038 Minneapolis, Minnesota 55459-0038 | Electronic Service | No | SPL_SL__CIP SPECIAL SERVICE LIST |
| Martin | Lepak | Martin.Lepak@aeoa.org | Arrowhead Economic Opportunity | 702 S 3rd Ave Virginia, MN 55792 | Electronic Service | No | SPL_SL__CIP SPECIAL SERVICE LIST |
| Corey | Lubovich | coreyl@hpuc.com | Hibbing Public Utilities Commission | 1902 6th Ave E Hibbing, MN 55746 | Electronic Service | No | SPL_SL__CIP SPECIAL SERVICE LIST |
| 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 | John.McWilliams@DairylandPower.com | 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@stinson.com | STINSON LLP | 50 S 6th St Ste 2600 Minneapolis, MN 55402 | Electronic Service | No | SPL_SL__CIP SPECIAL SERVICE LIST |
| David | Moeller | dmoeller@allete.com | Minnesota Power | 30 W Superior St Duluth, MN 558022093 | 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 |
|----------------|--------------------------------|--------------------------------------|---------------------------------------|---|--------------------|-------------------|------------------------------------|
| Andrew | Moratzka | andrew.moratzka@stoel.com | Steel Rives LLP | 33 South Sixth St Ste 4200 Minneapolis, MN 55402 | 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 |
| Samantha | Norris | samanthanorris@alliantenergy.com | Interstate Power and Light Company | 200 1st Street SE PO Box 351 Cedar Rapids, IA 524060351 | Electronic Service | No | SPL_SL_CIP SPECIAL SERVICE LIST |
| Audrey | Partridge | apartridge@mncee.org | Center for Energy and Environment | 212 3rd Ave. N. Suite 560 Minneapolis, Minnesota 55401 | Electronic Service | No | SPL_SL_CIP SPECIAL SERVICE LIST |
| Lisa | Pickard | lseverson@minnkota.com | Minnkota Power Cooperative | 5301 32nd Ave S Grand Forks, ND 58201 | Electronic Service | No | SPL_SL_CIP SPECIAL SERVICE LIST |
| Bill | Poppert | info@technologycos.com | Technology North | 2433 Highwood Ave St. Paul, MN 55119 | Electronic Service | No | SPL_SL_CIP SPECIAL SERVICE LIST |
| Dave | Reinke | dreinke@dakotaelectric.com | Dakota Electric Association | 4300 220th St W Farmington, MN 55024-9583 | Electronic Service | No | SPL_SL_CIP SPECIAL SERVICE LIST |
| 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 | No | SPL_SL_CIP SPECIAL SERVICE LIST |
| Will | Seuffert | Will.Seuffert@state.mn.us | Public Utilities Commission | 121 7th PI E Ste 350 Saint Paul, MN 55101 | Electronic Service | No | SPL_SL_CIP SPECIAL SERVICE LIST |
| 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 |

| First Name | Last Name | Email | Company Name | Address | Delivery Method | View Trade Secret | Service List Name |
|------------|-----------|------------------------------------|------------------------------------|--|--------------------|-------------------|----------------------------------|
| Anna | Sommer | ASommer@energyfuturesgroup.com | Energy Futures Group | PO Box 692 Canton, NY 13617 | Electronic Service | No | SPL_SL__CIP SPECIAL SERVICE LIST |
| Russ | Stark | Russ.Stark@ci.stpaul.mn.us | City of St. Paul | 390 City Hall 15 West Kellogg Boulevard Saint Paul, MN 55102 | Electronic Service | No | SPL_SL__CIP SPECIAL SERVICE LIST |
| Lynnette | Sweet | Regulatory.records@xcelenergy.com | Xcel Energy | 414 Nicollet Mall FL 7 Minneapolis, MN 554011993 | Electronic Service | No | SPL_SL__CIP SPECIAL SERVICE LIST |
| Kodi | Verhalen | kverhalen@taftlaw.com | Taft Stettinius & Hollister LLP | 80 S 8th St Ste 2200 Minneapolis, MN 55402 | Electronic Service | No | SPL_SL__CIP SPECIAL SERVICE LIST |
| Michael | Volker | mvolker@eastriver.coop | East River Electric Power Coop | 211 S. Harth Ave Madison, SD 57042 | Electronic Service | No | SPL_SL__CIP SPECIAL SERVICE LIST |
| Sharon N. | Walsh | swalsh@shakopeeutilities.com | Shakopee Public Utilities | 255 Sarazin St Shakopee, MN 55379 | Electronic Service | No | SPL_SL__CIP SPECIAL SERVICE LIST |
| Ethan | Warner | ethan.warner@centerpointenergy.com | CenterPoint Energy | 505 Nicollet Mall Minneapolis, Minnesota 55402 | 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 |

| First Name | Last Name | Email | Company Name | Address | Delivery Method | View Trade Secret | Service List Name |
|----------------|--------------------|--------------------------------|--|---|--------------------|-------------------|------------------------|
| Tom | Balster | tombalster@alliantenergy.com | Interstate Power & Light Company | PO Box 351 200 1st St SE Cedar Rapids, IA 524060351 | Electronic Service | No | OFF_SL_22-130_M-22-130 |
| Lisa | Beckner | lbeckner@mnpower.com | Minnesota Power | 30 W Superior St Duluth, MN 55802 | Electronic Service | No | OFF_SL_22-130_M-22-130 |
| Matthew | Brodin | mbrodin@allete.com | Minnesota Power Company | 30 West Superior St Duluth, MN 55802 | Electronic Service | No | OFF_SL_22-130_M-22-130 |
| Christina | Brusven | cbrusven@fredlaw.com | Fredrikson Byron | 200 S 6th St Ste 4000 Minneapolis, MN 554021425 | Electronic Service | No | OFF_SL_22-130_M-22-130 |
| Generic Notice | Commerce Attorneys | commerce.attorneys@agate.mn.us | Office of the Attorney General-DOC | 445 Minnesota Street Suite 1400 St. Paul, MN 55101 | Electronic Service | Yes | OFF_SL_22-130_M-22-130 |
| George | Crocker | gwillc@nawo.org | North American Water Office | PO Box 174 Lake Elmo, MN 55042 | Electronic Service | No | OFF_SL_22-130_M-22-130 |
| Steve | Downer | sdowner@mmua.org | MMUA | 3025 Harbor Ln N Ste 400 Plymouth, MN 554475142 | Electronic Service | No | OFF_SL_22-130_M-22-130 |
| Jim | Erchul | jerschul@dbnhs.org | Daytons Bluff Neighborhood Housing Sv. | 823 E 7th St St. Paul, MN 55106 | Electronic Service | No | OFF_SL_22-130_M-22-130 |
| Greg | Ernst | gaernst@q.com | G. A. Ernst & Associates, Inc. | 2377 Union Lake Trl Northfield, MN 55057 | Electronic Service | No | OFF_SL_22-130_M-22-130 |
| Melissa S | Feine | melissa.feine@semcac.org | SEMCAC | PO Box 549 204 S Elm St Rushford, MN 55971 | Electronic Service | No | OFF_SL_22-130_M-22-130 |

| First Name | Last Name | Email | Company Name | Address | Delivery Method | View Trade Secret | Service List Name |
|------------|-----------|------------------------------------|---------------------------------------|--|--------------------|-------------------|------------------------|
| Sharon | Ferguson | sharon.ferguson@state.mn.us | Department of Commerce | 85 7th Place E Ste 280 Saint Paul, MN 551012198 | Electronic Service | No | OFF_SL_22-130_M-22-130 |
| Karolanne | Foley | Karolanne.foley@dairylandpower.com | Dairyland Power Cooperative | PO Box 817 La Crosse, WI 54602-0817 | Electronic Service | No | OFF_SL_22-130_M-22-130 |
| Jenny | Glumack | jenny@mrea.org | Minnesota Rural Electric Association | 11640 73rd Ave N Maple Grove, MN 55369 | Electronic Service | No | OFF_SL_22-130_M-22-130 |
| Pat | Green | N/A | N Energy Dev | City Hall 401 E 21st St Hibbing, MN 55746 | Paper Service | No | OFF_SL_22-130_M-22-130 |
| Jason | Grenier | jgrenier@otpc.com | Otter Tail Power Company | 215 South Cascade Street Fergus Falls, MN 56537 | Electronic Service | No | OFF_SL_22-130_M-22-130 |
| Jeffrey | Haase | jhaase@grenergy.com | Great River Energy | 12300 Elm Creek Blvd Maple Grove, MN 55369 | Electronic Service | No | OFF_SL_22-130_M-22-130 |
| Tyler | Hamman | tylerh@bepc.com | Basin Electric Power Cooperative | 1717 E Interstate Ave Bismarck, ND 58501 | Electronic Service | No | OFF_SL_22-130_M-22-130 |
| Joe | Hoffman | ja.hoffman@smmpa.org | SMMPA | 500 First Ave SW Rochester, MN 55902-3303 | Electronic Service | No | OFF_SL_22-130_M-22-130 |
| Lori | Hoyum | lhoyum@mnpower.com | Minnesota Power | 30 West Superior Street Duluth, MN 55802 | Electronic Service | No | OFF_SL_22-130_M-22-130 |
| Dave | Johnson | dave.johnson@aeoa.org | Arrowhead Economic Opportunity Agency | 702 3rd Ave S Virginia, MN 55792 | Electronic Service | No | OFF_SL_22-130_M-22-130 |

| First Name | Last Name | Email | Company Name | Address | Delivery Method | View Trade Secret | Service List Name |
|------------|------------|------------------------------------|------------------------------------|--|--------------------|-------------------|------------------------|
| Tina | Koecher | tkoecher@mnpower.com | Minnesota Power | 30 W Superior St Duluth, MN 558022093 | Electronic Service | No | OFF_SL_22-130_M-22-130 |
| Kelly | Lady | kellyl@austinutilities.com | Austin Utilities | 400 4th St NE Austin, MN 55912 | Electronic Service | No | OFF_SL_22-130_M-22-130 |
| Martin | Lepak | Martin.Lepak@aeoa.org | Arrowhead Economic Opportunity | 702 S 3rd Ave Virginia, MN 55792 | Electronic Service | No | OFF_SL_22-130_M-22-130 |
| Pam | Marshall | pam@energycents.org | Energy CENTS Coalition | 823 7th St E St. Paul, MN 55106 | Electronic Service | No | OFF_SL_22-130_M-22-130 |
| John | McWilliams | John.McWilliams@DairylandPower.com | Dairyland Power Cooperative | 3200 East Ave SPO Box 817 La Crosse, WI 54601-7227 | Electronic Service | No | OFF_SL_22-130_M-22-130 |
| Brian | Meloy | brian.meloy@stinson.com | STINSON LLP | 50 S 6th St Ste 2600 Minneapolis, MN 55402 | Electronic Service | No | OFF_SL_22-130_M-22-130 |
| David | Moeller | dmoeller@allete.com | Minnesota Power | 30 W Superior St Duluth, MN 558022093 | Electronic Service | No | OFF_SL_22-130_M-22-130 |
| Carl | Nelson | cnelson@mncee.org | Center for Energy and Environment | 212 3rd Ave N Ste 560 Minneapolis, MN 55401 | Electronic Service | No | OFF_SL_22-130_M-22-130 |
| Samantha | Norris | samanthanorris@alliantenergy.com | Interstate Power and Light Company | 200 1st Street SE PO Box 351 Cedar Rapids, IA 524060351 | Electronic Service | No | OFF_SL_22-130_M-22-130 |
| | | | | | | | |

| First Name | Last Name | Email | Company Name | Address | Delivery Method | View Trade Secret | Service List Name |
|----------------|--------------------------------|--------------------------------------|------------------------------------|--|--------------------|-------------------|------------------------|
| Leah | Peterson | lpeterson@mnpower.com | Minnesota Power | 30 West Superior St Duluth, MN 55802 | Electronic Service | No | OFF_SL_22-130_M-22-130 |
| Lisa | Pickard | lseverson@minnkota.com | Minnkota Power Cooperative | 5301 32nd Ave S Grand Forks, ND 58201 | Electronic Service | No | OFF_SL_22-130_M-22-130 |
| Dave | Reinke | dreinke@dakotaelectric.com | Dakota Electric Association | 4300 220th St W Farmington, MN 55024-9583 | Electronic Service | No | OFF_SL_22-130_M-22-130 |
| 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_22-130_M-22-130 |
| Susan | Romans | sromans@allete.com | Minnesota Power | 30 West Superior Street Legal Dept Duluth, MN 55802 | Electronic Service | No | OFF_SL_22-130_M-22-130 |
| Will | Seuffert | Will.Seuffert@state.mn.us | Public Utilities Commission | 121 7th Pl E Ste 350 Saint Paul, MN 55101 | Electronic Service | Yes | OFF_SL_22-130_M-22-130 |
| Ken | Smith | ken.smith@districtenergy.com | District Energy St. Paul Inc. | 76 W Kellogg Blvd St. Paul, MN 55102 | Electronic Service | No | OFF_SL_22-130_M-22-130 |
| Lynnette | Sweet | Regulatory.records@xcelenergy.com | Xcel Energy | 414 Nicollet Mall FL 7 Minneapolis, MN 554011993 | Electronic Service | No | OFF_SL_22-130_M-22-130 |
| Michael | Volker | mvolker@eastriver.coop | East River Electric Power Coop | 211 S. Harth Ave Madison, SD 57042 | Electronic Service | No | OFF_SL_22-130_M-22-130 |
| Robyn | Woeste | robynwoeste@alliantenergy.com | Interstate Power and Light Company | 200 First St SE Cedar Rapids, IA 52401 | Electronic Service | No | OFF_SL_22-130_M-22-130 |