



February 8, 2022

-Via Electronic Filing-

The Honorable Jessica Palmer-Denig The Honorable Barbara Case Office of Administrative Hearings P.O. Box 64620 St. Paul, MN 55164-0620 Jessica.palmer-denig@state.mn.us Barbara.case@state.mn.us

RE: ERRATA

FEBRUARY 2021 NATURAL GAS PRICE INVESTIGATION MPUC DOCKET Nos. G008/M-21-138, G004/M-21-235, G002/CI-21-610

AND G011/CI-21-611

OAH DOCKET No. 71-2500-37763

Dear Judges Palmer-Denig and Case:

Northern States Power Company, doing business as Xcel Energy, submits to the Office of Administrative Hearings this Errata to the Direct Testimony of Richard G. Smead on behalf of the Joint Gas Utilities, the Direct Testimony of Richard L. Derryberry for Xcel Energy, and the Rebuttal Testimony of Richard L. Derryberry.

We describe the corrections in the table below.

Location	Original	Correction	
Richard G. Smead Direct	Times were shown in	Times shown in Central	
Testimony, page 17, Figure	Mountain Standard Time	Standard Time	
2			
Richard L. Derryberry	Delivered supply for	Delivered supply for	
Direct Testimony,	Wednesday, February 17	Wednesday, February 17	
Exhibit(RLD-1),	was listed as 34,000 Dth	should be 30,000 Dth	
Schedule 2, Table 3			
	Supply failures for	Supply failures for	
	Wednesday, February 17	Wednesday, February 17	
	was listed as 10,416 Dth	should be 6,416 Dth	
Richard L. Derryberry	Two references that	Both references should say	
Rebuttal Testimony,	"forecast exceeded load"	"load exceeded forecast"	
Exhibit(RLD-2), page		Corrected page is the same	
22, lines 20 and 22		for both his public and not	
		public version.	

We have electronically filed this document with the Commission, and copies have been served on the parties on the attached service list. Please contact me at lisa.r.peterson@xcelenergy.com or (612) 330-7681 or Jennifer Roesler at jennifer.roesler@xcelenergy.com or (612) 330-1925 if you have any questions regarding this filing.

Sincerely,

/s/

LISA PETERSON MANAGER, REGULATORY ANALYSIS

c: Service List

Figure 1—NAESB Nomination Timeline

Scheduled

Quantities

5:00 PM

9:00 PM

1:00 PM

5:30 PM

10:00 PM

Time of Gas

Flow

9:00 AM

9:00 AM

2:00 PM

6:00 PM

10:00 PM

Bumping of

N/A

Yes

Yes

Yes

No

2

1

3 4 5

6 7

8

9

CAN YOU DEMONSTRATE HOW THESE FLOW THROUGH THE DAY BEFORE AND

Nomination

Deadline

(CCT)

1:00 PM

6:00 PM

10:00 AM

2:30 PM

7:00 PM

Nomination

Cycle

Timely

Evening

Intra Day 1

Intra Day 2

Intra Day 3

10 **DURING FLOW?**

11 Yes, Figure 2 is a graphic depiction of the nomination deadlines and flow times 12 for the Timely, Evening, Intra Day 1, Intra Day 2, and Intra Day 3 nomination 13 cycles.

14

15

Figure 2—Nomination Flow Chart (corrected times)

16 17

18 19

20

21

22

24

25

26

27

Prior Day 6:00 PM-7:00 PM 10:00PM :00 PM 6:00 PM 9:00 AM 7:00 PM 6:00 PM 10:00 PM 10:00 PM 8:59 AM Cvcle Nom . Flow Timely **Evening Cycle** Re-Nom Flow NO CHANGES Flow Intra Day 1 Re-Nom Intra Day 2 Re-Nom = Intra Day 3 * Re-Nom = Intra Day 3 is a "no-bump" cycle, in which a change in a firm nomination cannot displace interruptible shippers

23 DO PIPELINES HAVE MECHANISMS FOR OFFSETTING THIS RELATIVE RIGIDITY? O.

Yes. Pipeline customers have certain advantages that the electric market does Α. not present. These advantages center around natural gas storage and the use of pipeline "line pack" (increases and decreases in pipeline pressures to respond to short-term variations in load). During lower-demand periods, when the pipeline

MPUC Docket No. G002/CI-21-610 OAH Docket No. 71-2500-37763 Exhibit___(RLD-1), Schedule 2 Page 28 of 41

Table 3: Supplies for Minnesota and North Dakota by Source (corrected Delivered Supply and Supply Failures for February 17)

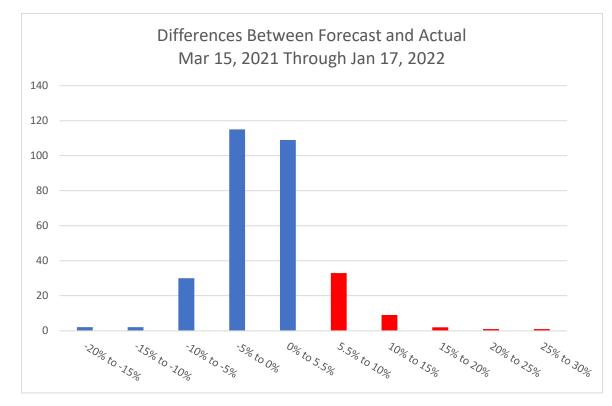
	Saturday, Feb. 13th	Sunday, Feb. 14th	Monday, Feb. 15th	Tuesday, Feb. 16th	Wednesday, Feb. 17th
Baseload Purchases	168,600	168,600	168,600	168,600	168,600
Delivered Supply	37,700	37,700	37,700	37,700	30,000
Spot Purchases	356,427	356,427	356,427	356,427	273,549
Less Supply Failures	0	-1,028	-33,245	-12,417	-6,416
"Make Up" Purchases	0	14,442	8,280		0
Total Purchased Supplies	562,727	576,141	537,762	550,310	465,733
Planned Storage	190,213	190,213	190,213	190,213	190,213
Total Planned Supplies	752,940	766,354	727,975	740,523	655,946
Forecasted Load	729,191	754,477	724,738	674,779	644,628
Actual Load	702,070	710,041	683,676	614,091	574,135

Table 3 shows that we planned to fully use our monthly baseload purchases, delivered supply, and storage withdrawal capability for each day of the weekend. The shortfall between those total quantities and the forecasted load was covered by daily spot purchases. Spot purchases do not vary over the weekend as the market required us to purchase all of our gas on Friday for each day of the weekend, including Tuesday February 16, in the same daily quantity. In a few instances, purchased supply failed to be delivered causing us to search for and purchase some replacement quantities.

Each day's planned usage slightly exceeds the forecasted load. As explained below, it is prudent and the Company always plans for in every case, to have a supply reserve (or safety margin) available each day. The reserve margin is our back-up plan in case, among other things, temperatures are colder than expected, there are interstate pipeline outages, or there are supply failures. As indicated on the table, we did experience 33,000 Dth of supply failures on Sunday demonstrating that it is critical to have a reserve supply margin in place. However, the table also shows that our gas supply exceeded our actual load on each day of the event, which allowed us to continue service to our customers. Any unburned gas was balanced against our storage account at the end of each day.

To ensure that the Company has sufficient natural gas for our firm customers through

Figure 1: Differences Between Forecast and Actual



This chart is instructive in evaluating Mr. King's supply reserve margin claims. For example, we will focus on the claim that 5.5 percent is a reasonable supply reserve with respect to the more critical situation where service may be jeopardized due to a lack of supplies (the positive side of the chart). During this period, there were 109 days where load exceeded forecast by 5.5 percent or less (36 percent of the time), which falls under Mr. King's proposal. However, there were 46 days where load exceeded forecast by more than 5.5 percent (15 percent of the time). These potential loss of service days are shown in red. In other words, if the supply reserve margin were capped at 5.5 percent, we would not have purchased enough gas to serve our customers on those 46 days. Of

CERTIFICATE OF SERVICE

- I, Mustafa Adam, hereby certify that I have this day served copies of the foregoing document on the attached list of persons.
 - <u>xx</u> by depositing a true and correct copy thereof, properly enveloped with postage paid in the United States mail at Minneapolis, Minnesota
 - xx electronic filing

Docket Nos. G008/M-21-138

G004/M-21-235 G002/CI-21-610 G011/CI-21-611

Dated this 8th day of February 2022

/s/

Mustafa Adam Regulatory Administrator

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Jorge	Alonso	jorge.alonso@state.mn.us	Public Utilities Commission	121 7th Place East Suite 350 St. Paul, MN 55101	Electronic Service	No	OFF_SL_21-138_Official CC Service List
James H.	Barkley	james.barkley@bakerbotts. com	Baker Botts	910 Louisiana Street Houston, TX 77002-4995	Electronic Service	No	OFF_SL_21-138_Official CC Service List
James J.	Bertrand	james.bertrand@stinson.co m	STINSON LLP	50 S 6th St Ste 2600 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-138_Official CC Service List
Brenda A.	Bjorklund	brenda.bjorklund@centerp ointenergy.com	CenterPoint Energy	505 Nicollet Mall Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-138_Official CC Service List
Barbara	Case	barbara.case@state.mn.us	Office of Administrative Hearings	600 N. Robert St. St. Paul, Mn. 55101	Electronic Service	No	OFF_SL_21-138_Official CC Service List
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.st ate.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-138_Official CC Service List
Riley	Conlin	riley.conlin@stoel.com	Stoel Rives LLP	33 S. 6th Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-138_Official CC Service List
Richard	Dornfeld	Richard.Dornfeld@ag.state .mn.us	Office of the Attorney General-DOC	Minnesota Attorney General's Office 445 Minnesota Street Suite 1800 Saint Paul, Minnesota 55101	Electronic Service	No	OFF_SL_21-138_Official CC Service List
Brian	Edstrom	briane@cubminnesota.org	Citizens Utility Board of Minnesota	332 Minnesota St Ste W1360 Saint Paul, MN 55101	Electronic Service	No	OFF_SL_21-138_Official CC 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	OFF_SL_21-138_Official CC Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Edward	Garvey	garveyed@aol.com	Residence	32 Lawton St Saint Paul, MN 55102	Electronic Service	No	OFF_SL_21-138_Official CC Service List
Kim	Havey	kim.havey@minneapolismn .gov	City of Minneapolis	350 South 5th Street, Suite 315M Minneapolis, MN 55415	Electronic Service	No	OFF_SL_21-138_Official CC Service List
Katherine	Hinderlie	katherine.hinderlie@ag.stat e.mn.us	Office of the Attorney General-DOC	445 Minnesota St Suite 1400 St. Paul, MN 55101-2134	Electronic Service	No	OFF_SL_21-138_Official CC Service List
Travis	Jacobson	travis.jacobson@mdu.com	Great Plains Natural Gas Company	400 N 4th St Bismarck, ND 58501	Electronic Service	No	OFF_SL_21-138_Official CC Service List
Max	Kieley	max.kieley@ag.state.mn.us	Office of the Attorney General-RUD	1400 Town Square Tower 445 Minnesota Street St. Paul, MN 55101	Electronic Service	No	OFF_SL_21-138_Official CC Service List
Kyle R.	Kroll	kkroll@winthrop.com	Winthrop & Weinstine, P.A.	225 South Sixth Street Suite 3500 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-138_Official CC Service List
Andrew	Larson	andrew.m.larson@state.mn .us	Public Utilities Commission	121 7th Place E., #350 Saint Paul, MN 55101	Electronic Service	No	OFF_SL_21-138_Official CC Service List
Erica	Larson	erica.larson@centerpointen ergy.com	CenterPoint Energy	505 Nicollet Avenue P.O. Box 59038 Minneapolis, Minnesota 55459-0038	Electronic Service	No	OFF_SL_21-138_Official CC Service List
Amber	Lee	Amber.Lee@centerpointen ergy.com	CenterPoint Energy	505 Nicollet Mall Minneapolis, MN 55402	Electronic Service	Yes	OFF_SL_21-138_Official CC Service List
Annie	Levenson Falk	annielf@cubminnesota.org	Citizens Utility Board of Minnesota	332 Minnesota Street, Suite W1360 St. Paul, MN 55101	Electronic Service	No	OFF_SL_21-138_Official CC Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Pam	Marshall	pam@energycents.org	Energy CENTS Coalition	823 7th St E St. Paul, MN 55106	Electronic Service	No	OFF_SL_21-138_Official CC Service List
Joseph	Meyer	joseph.meyer@ag.state.mn .us	Office of the Attorney General-RUD	Bremer Tower, Suite 1400 445 Minnesota Street St Paul, MN 55101-2131	Electronic Service	No	OFF_SL_21-138_Official CC Service List
David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022093	Electronic Service	No	OFF_SL_21-138_Official CC Service List
Andrew	Moratzka	andrew.moratzka@stoel.co m	Stoel Rives LLP	33 South Sixth St Ste 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-138_Official CC Service List
Samantha	Norris	samanthanorris@alliantene rgy.com	Interstate Power and Light Company	200 1st Street SE PO Box 351 Cedar Rapids, IA 524060351	Electronic Service	No	OFF_SL_21-138_Official CC Service List
Jessica	Palmer Denig	jessica.palmer- Denig@state.mn.us	Office of Administrative Hearings	600 Robert St N PO Box 64620 St. Paul, MN 55164	Electronic Service	No	OFF_SL_21-138_Official CC Service List
Lisa	Peterson	lisa.r.peterson@xcelenergy .com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_21-138_Official CC Service List
Generic Notice	Residential Utilities Division	residential.utilities@ag.stat e.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_21-138_Official CC Service List
Elizabeth	Schmiesing	eschmiesing@winthrop.co m	Winthrop & Weinstine, P.A.	225 South Sixth Street Suite 3500 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-138_Official CC Service List
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th PI E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-138_Official CC Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Janet	Shaddix Elling	jshaddix@janetshaddix.co m	Shaddix And Associates	7400 Lyndale Ave S Ste 190 Richfield, MN 55423	Electronic Service	Yes	OFF_SL_21-138_Official CC Service List
Peggy	Sorum	peggy.sorum@centerpointe nergy.com	CenterPoint Energy	505 Nicollet Mall Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-138_Official CC Service List
Richard	Stasik	richard.stasik@wecenergyg roup.com	Minnesota Energy Resources Corporation (HOLDING)	231 West Michigan St - P321 Milwaukee, WI 53203	Electronic Service	No	OFF_SL_21-138_Official CC Service List
Kristin	Stastny	kstastny@taftlaw.com	Taft Stettinius & Hollister LLP	2200 IDS Center 80 South 8th St Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-138_Official CC Service List
James M	Strommen	jstrommen@kennedy- graven.com	Kennedy & Graven, Chartered	150 S 5th St Ste 700 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-138_Official CC Service List
Eric	Swanson	eswanson@winthrop.com	Winthrop & Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_21-138_Official CC Service List
James	Worlobah	james.worlobah@state.mn. us	Public Utilities Commission	121 7th Place E, Suite 350 St. Paul, MN 55101	Electronic Service	No	OFF_SL_21-138_Official CC Service List
Michael A.	Yuffee	michael.yuffee@bakerbotts .com	Baker Botts	700 K St NW Washington, DC 20001	Electronic Service	No	OFF_SL_21-138_Official CC Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Brenda A.	Bjorklund	brenda.bjorklund@centerp ointenergy.com	CenterPoint Energy	505 Nicollet Mall Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-235_Official CC Service List
Barbara	Case	barbara.case@state.mn.us	Office of Administrative Hearings	600 N. Robert St. St. Paul, Mn. 55101	Electronic Service	Yes	OFF_SL_21-235_Official CC Service List
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.st ate.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-235_Official CC Service List
Riley	Conlin	riley.conlin@stoel.com	Stoel Rives LLP	33 S. 6th Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-235_Official CC Service List
Brian	Edstrom	briane@cubminnesota.org	Citizens Utility Board of Minnesota	332 Minnesota St Ste W1360 Saint Paul, MN 55101	Electronic Service	No	OFF_SL_21-235_Official CC 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	OFF_SL_21-235_Official CC Service List
Travis	Jacobson	travis.jacobson@mdu.com	Great Plains Natural Gas Company	400 N 4th St Bismarck, ND 58501	Electronic Service	Yes	OFF_SL_21-235_Official CC Service List
Max	Kieley	max.kieley@ag.state.mn.us	Office of the Attorney General-RUD	1400 Town Square Tower 445 Minnesota Street St. Paul, MN 55101	Electronic Service	No	OFF_SL_21-235_Official CC Service List
Brian	Meloy	brian.meloy@stinson.com	STINSON LLP	50 S 6th St Ste 2600 Minneapolis, MN 55402	Electronic Service	Yes	OFF_SL_21-235_Official CC Service List
Joseph	Meyer	joseph.meyer@ag.state.mn .us	Office of the Attorney General-RUD	Bremer Tower, Suite 1400 445 Minnesota Street St Paul, MN 55101-2131	Electronic Service	No	OFF_SL_21-235_Official CC Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Andrew	Moratzka	andrew.moratzka@stoel.co m	Stoel Rives LLP	33 South Sixth St Ste 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-235_Official CC Service List
Jessica	Palmer Denig	jessica.palmer- Denig@state.mn.us	Office of Administrative Hearings	600 Robert St N PO Box 64620 St. Paul, MN 55164	Electronic Service	Yes	OFF_SL_21-235_Official CC Service List
Lisa	Peterson	lisa.r.peterson@xcelenergy .com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 55401	Electronic Service	Yes	OFF_SL_21-235_Official CC Service List
Generic Notice	Residential Utilities Division	residential.utilities@ag.stat e.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_21-235_Official CC Service List
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th PI E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-235_Official CC Service List
Janet	Shaddix Elling	jshaddix@janetshaddix.co m	Shaddix And Associates	7400 Lyndale Ave S Ste 190 Richfield, MN 55423	Electronic Service	No	OFF_SL_21-235_Official CC Service List
Richard	Stasik	richard.stasik@wecenergyg roup.com	Minnesota Energy Resources Corporation (HOLDING)	231 West Michigan St - P321 Milwaukee, WI 53203	Electronic Service	No	OFF_SL_21-235_Official CC Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Mara	Ascheman	mara.k.ascheman@xcelen ergy.com	Xcel Energy	414 Nicollet Mall FI 5 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_21-610_Official CC Service List
James J.	Bertrand	james.bertrand@stinson.co m	STINSON LLP	50 S 6th St Ste 2600 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-610_Official CC Service List
Brenda A.	Bjorklund	brenda.bjorklund@centerp ointenergy.com	CenterPoint Energy	505 Nicollet Mall Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-610_Official CC Service List
Barbara	Case	barbara.case@state.mn.us	Office of Administrative Hearings	600 N. Robert St. St. Paul, Mn. 55101	Electronic Service	Yes	OFF_SL_21-610_Official CC Service List
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Riley	Conlin	riley.conlin@stoel.com	Stoel Rives LLP	33 S. 6th Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-610_Official CC Service List
Brian	Edstrom	briane@cubminnesota.org	Citizens Utility Board of Minnesota	332 Minnesota St Ste W1360 Saint Paul, MN 55101	Electronic Service	No	OFF_SL_21-610_Official CC 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	OFF_SL_21-610_Official CC Service List
Edward	Garvey	garveyed@aol.com	Residence	32 Lawton St Saint Paul, MN 55102	Electronic Service	No	OFF_SL_21-610_Official CC Service List
Matthew B	Harris	matt.b.harris@xcelenergy.c om	XCEL ENERGY	401 Nicollet Mall FL 8 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_21-610_Official CC Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Kim	Havey	kim.havey@minneapolismn .gov	City of Minneapolis	350 South 5th Street, Suite 315M Minneapolis, MN 55415	Electronic Service	No	OFF_SL_21-610_Official CC Service List
Travis	Jacobson	travis.jacobson@mdu.com	Great Plains Natural Gas Company	400 N 4th St Bismarck, ND 58501	Electronic Service	No	OFF_SL_21-610_Official CC Service List
Max	Kieley	max.kieley@ag.state.mn.us	Office of the Attorney General-RUD	1400 Town Square Tower 445 Minnesota Street St. Paul, MN 55101	Electronic Service	No	OFF_SL_21-610_Official CC Service List
Kyle R.	Kroll	kkroll@winthrop.com	Winthrop & Weinstine, P.A.	225 South Sixth Street Suite 3500 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-610_Official CC Service List
Erica	Larson	erica.larson@centerpointen ergy.com	CenterPoint Energy	505 Nicollet Avenue P.O. Box 59038 Minneapolis, Minnesota 55459-0038	Electronic Service	No	OFF_SL_21-610_Official CC Service List
Amber	Lee	Amber.Lee@centerpointen ergy.com	CenterPoint Energy	505 Nicollet Mall Minneapolis, MN 55402	Electronic Service	Yes	OFF_SL_21-610_Official CC Service List
Annie	Levenson Falk	annielf@cubminnesota.org	Citizens Utility Board of Minnesota	332 Minnesota Street, Suite W1360 St. Paul, MN 55101	Electronic Service	No	OFF_SL_21-610_Official CC Service List
Pam	Marshall	pam@energycents.org	Energy CENTS Coalition	823 7th St E St. Paul, MN 55106	Electronic Service	No	OFF_SL_21-610_Official CC Service List
Brian	Meloy	brian.meloy@stinson.com	STINSON LLP	50 S 6th St Ste 2600 Minneapolis, MN 55402	Electronic Service	Yes	OFF_SL_21-610_Official CC Service List
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David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022093	Electronic Service	No	OFF_SL_21-610_Official CC Service List
Andrew	Moratzka	andrew.moratzka@stoel.co m	Stoel Rives LLP	33 South Sixth St Ste 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-610_Official CC Service List
Samantha	Norris	samanthanorris@alliantene rgy.com	Interstate Power and Light Company	200 1st Street SE PO Box 351 Cedar Rapids, IA 524060351	Electronic Service	No	OFF_SL_21-610_Official CC Service List
Jessica	Palmer Denig	jessica.palmer- Denig@state.mn.us	Office of Administrative Hearings	600 Robert St N PO Box 64620 St. Paul, MN 55164	Electronic Service	No	OFF_SL_21-610_Official CC Service List
isa	Peterson	lisa.r.peterson@xcelenergy .com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 55401	Electronic Service	Yes	OFF_SL_21-610_Official CC Service List
Generic Notice	Residential Utilities Division	residential.utilities@ag.stat e.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_21-610_Official CC Service List
Elizabeth	Schmiesing	eschmiesing@winthrop.co m	Winthrop & Weinstine, P.A.	225 South Sixth Street Suite 3500 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-610_Official CC Service List
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th PI E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-610_Official CC Service List
Janet	Shaddix Elling	jshaddix@janetshaddix.co m	Shaddix And Associates	7400 Lyndale Ave S Ste 190 Richfield, MN 55423	Electronic Service	Yes	OFF_SL_21-610_Official CC Service List

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Peggy	Sorum	peggy.sorum@centerpointe nergy.com	CenterPoint Energy	505 Nicollet Mall Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-610_Official CC Service List
Richard	Stasik	richard.stasik@wecenergyg roup.com	Minnesota Energy Resources Corporation (HOLDING)	231 West Michigan St - P321 Milwaukee, WI 53203	Electronic Service	No	OFF_SL_21-610_Official CC Service List
James M	Strommen	jstrommen@kennedy- graven.com	Kennedy & Graven, Chartered	150 S 5th St Ste 700 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-610_Official CC Service List
Eric	Swanson	eswanson@winthrop.com	Winthrop & Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_21-610_Official CC Service List
Lynnette	Sweet	Regulatory.records@xcele nergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	Yes	OFF_SL_21-610_Official CC Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
James J.	Bertrand	james.bertrand@stinson.co m	STINSON LLP	50 S 6th St Ste 2600 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-611_Official CC Service List
Brenda A.	Bjorklund	brenda.bjorklund@centerp ointenergy.com	CenterPoint Energy	505 Nicollet Mall Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-611_Official CC Service List
Jocelyn	Bremer	jocelyn.bremer@minneapol ismn.gov	City of Minneapolis	350 S Fifth St Ste 210 Minneapolis, MN 55415	Electronic Service	No	OFF_SL_21-611_Official CC Service List
Barbara	Case	barbara.case@state.mn.us	Office of Administrative Hearings	600 N. Robert St. St. Paul, Mn. 55101	Electronic Service	Yes	OFF_SL_21-611_Official CC Service List
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.st ate.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-611_Official CC Service List
Riley	Conlin	riley.conlin@stoel.com	Stoel Rives LLP	33 S. 6th Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-611_Official CC Service List
Brian	Edstrom	briane@cubminnesota.org	Citizens Utility Board of Minnesota	332 Minnesota St Ste W1360 Saint Paul, MN 55101	Electronic Service	No	OFF_SL_21-611_Official CC 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	OFF_SL_21-611_Official CC Service List
Edward	Garvey	garveyed@aol.com	Residence	32 Lawton St Saint Paul, MN 55102	Electronic Service	No	OFF_SL_21-611_Official CC Service List
Kim	Havey	kim.havey@minneapolismn .gov	City of Minneapolis	350 South 5th Street, Suite 315M Minneapolis, MN 55415	Electronic Service	No	OFF_SL_21-611_Official CC Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Travis	Jacobson	travis.jacobson@mdu.com	Great Plains Natural Gas Company	400 N 4th St Bismarck, ND 58501	Electronic Service	No	OFF_SL_21-611_Official CC Service List
Max	Kieley	max.kieley@ag.state.mn.us	Office of the Attorney General-RUD	1400 Town Square Tower 445 Minnesota Street St. Paul, MN 55101	Electronic Service	No	OFF_SL_21-611_Official CC Service List
Erica	Larson	erica.larson@centerpointen ergy.com	CenterPoint Energy	505 Nicollet Avenue P.O. Box 59038 Minneapolis, Minnesota 55459-0038	Electronic Service	No	OFF_SL_21-611_Official CC Service List
Amber	Lee	Amber.Lee@centerpointen ergy.com	CenterPoint Energy	505 Nicollet Mall Minneapolis, MN 55402	Electronic Service	Yes	OFF_SL_21-611_Official CC Service List
Annie	Levenson Falk	annielf@cubminnesota.org	Citizens Utility Board of Minnesota	332 Minnesota Street, Suite W1360 St. Paul, MN 55101	Electronic Service	No	OFF_SL_21-611_Official CC Service List
Pam	Marshall	pam@energycents.org	Energy CENTS Coalition	823 7th St E St. Paul, MN 55106	Electronic Service	No	OFF_SL_21-611_Official CC Service List
Brian	Meloy	brian.meloy@stinson.com	STINSON LLP	50 S 6th St Ste 2600 Minneapolis, MN 55402	Electronic Service	Yes	OFF_SL_21-611_Official CC Service List
Joseph	Meyer	joseph.meyer@ag.state.mn .us	Office of the Attorney General-RUD	Bremer Tower, Suite 1400 445 Minnesota Street St Paul, MN 55101-2131	Electronic Service	No	OFF_SL_21-611_Official CC Service List
David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022093	Electronic Service	No	OFF_SL_21-611_Official CC Service List
Andrew	Moratzka	andrew.moratzka@stoel.co m	Stoel Rives LLP	33 South Sixth St Ste 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-611_Official CC Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Samantha	Norris	samanthanorris@alliantene rgy.com	Interstate Power and Light Company	200 1st Street SE PO Box 351 Cedar Rapids, IA 524060351	Electronic Service	No	OFF_SL_21-611_Official CC Service List
Jessica	Palmer Denig	jessica.palmer- Denig@state.mn.us	Office of Administrative Hearings	600 Robert St N PO Box 64620 St. Paul, MN 55164	Electronic Service	Yes	OFF_SL_21-611_Official CC Service List
Lisa	Peterson	lisa.r.peterson@xcelenergy .com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_21-611_Official CC Service List
Catherine	Phillips	Catherine.Phillips@wecene rgygroup.com	Minnesota Energy Resources	231 West Michigan St Milwaukee, WI 53203	Electronic Service	No	OFF_SL_21-611_Official CC Service List
Generic Notice	Residential Utilities Division	residential.utilities@ag.stat e.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_21-611_Official CC Service List
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th PI E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-611_Official CC Service List
Janet	Shaddix Elling	jshaddix@janetshaddix.co m	Shaddix And Associates	7400 Lyndale Ave S Ste 190 Richfield, MN 55423	Electronic Service	Yes	OFF_SL_21-611_Official CC Service List
Peggy	Sorum	peggy.sorum@centerpointe nergy.com	CenterPoint Energy	505 Nicollet Mall Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-611_Official CC Service List
Richard	Stasik	richard.stasik@wecenergyg roup.com	Minnesota Energy Resources Corporation (HOLDING)	231 West Michigan St - P321 Milwaukee, WI 53203	Electronic Service	No	OFF_SL_21-611_Official CC Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Kristin	Stastny	kstastny@taftlaw.com	Taft Stettinius & Hollister LLP	2200 IDS Center 80 South 8th St Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-611_Official CC Service List
James M	Strommen	jstrommen@kennedy- graven.com	Kennedy & Graven, Chartered	150 S 5th St Ste 700 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-611_Official CC Service List
Eric	Swanson	eswanson@winthrop.com	Winthrop & Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_21-611_Official CC Service List