



Minnesota Energy Resources Corporation  
2685 145th Street West  
Rosemount, MN 55068  
www.minnesotaenergyresources.com

April 29, 2022

Mr. Will Seuffert  
Executive Secretary  
Minnesota Public Utilities Commission  
121 Seventh Place East, Suite 350  
St. Paul, MN 55101

**VIA ELECTRONIC FILING**

**Re: In the Matter of the Petition of Minnesota Energy Resources Corporation for Approval of the 2021 Conservation Improvement Program Tracker Account, Demand-Side Management Financial Incentive, and Conservation Cost Recovery Adjustment Factor**

**Docket No. G011/M-22-\_\_\_\_**

Dear Mr. Seuffert:

Enclosed, please find the Petition of Minnesota Energy Resources Corporation ("MERC") for Approval of the 2021 Conservation Improvement Program ("CIP") Tracker Account, Demand-Side Management ("DSM") Financial Incentive, and Conservation Cost Recovery Adjustment factor. Excel versions of Attachment B, the Company's 2021 DSM Financial Incentive and supporting BENCOST analyses, are being filed concurrently.

The Minnesota Public Utilities Commission's October 28, 2014, Findings of Fact, Conclusions, and Order in Docket No. G011/GR-13-617 at Order Point 13 also required that MERC include, in future CIP tracker-account filings, annual compliance filings documenting that its CIP-exempt customers have been properly identified and are being properly billed. MERC has included an update regarding CIP billing compliance in the attached report.

Copies of this filing have been served on the Minnesota Department of Commerce, Division of Energy Resources and the Minnesota Office of the Attorney General – Residential Utilities Division. A summary of this filing has been served on all parties on the attached service lists.

Please contact me at (414) 221-4208 if you have any questions regarding this filing.

Sincerely,

A handwritten signature in black ink that reads "Joylyn C. Hoffman Malueg".

Joylyn C. Hoffman Malueg  
Project Specialist 3  
Minnesota Energy Resources Corporation

Enclosures  
cc: Service Lists

**STATE OF MINNESOTA  
BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION**

Katie J. Sieben  
Valerie Means  
Matthew Schuerger  
Joseph K. Sullivan  
John A. Tuma

Chair  
Commissioner  
Commissioner  
Commissioner  
Commissioner

In the Matter of the Petition of Minnesota  
Energy Resources Corporation for Approval  
of the 2021 Conservation Improvement  
Program Tracker Account, Demand-Side  
Management Financial Incentive, and  
Conservation Cost Recovery Adjustment  
Factor

Docket No. G011/M-22-\_\_\_\_

**PETITION**

**INTRODUCTION**

Minnesota Energy Resources Corporation (“MERC” or the “Company”) submits this Petition pursuant to the Minnesota Public Utilities Commission’s (“Commission”) Order Establishing Utility Performance Incentives for Energy Conservation issued in Docket No. E,G999/CI-08-133. In this filing, MERC seeks approval of its Conservation Improvement Program (“CIP”) tracker account balance and a Demand-Side Management (“DSM”) financial incentive for the period January 1, 2021, through December 31, 2021. MERC is also seeking Commission approval of a proposed modified Conservation Cost Recovery Adjustment (“CCRA”) factor effective January 1, 2023. MERC filed its CIP Status Report covering the same period in Docket No. G011/CIP-20-479.

**I. Summary of Filing**

A one-paragraph summary of the filing accompanies this Petition pursuant to Minn. R. 7829.1300, subp. 1.

**II. Service on Other Parties**

Pursuant to Minn. R. 7829.1300, subp. 2, MERC has served a copy of this petition on the Minnesota Department of Commerce, Division of Energy Resources and the Minnesota

Office of the Attorney General – Residential Utilities Division. A summary of this filing has been served on all parties on the attached service list.

**III. General Filing Information**

Pursuant to Minn. R. 7829.1300, subp. 3, MERC provides the following information:

**A. Name, Address, and Telephone Number of Filing Party**

Minnesota Energy Resources Corporation  
2685 145<sup>th</sup> Street West  
Rosemount, MN 55068  
(651) 322-8901

**B. Name, Address, Electronic Address, and Telephone Number of Attorney for the Filing Party**

Kristin M. Stastny  
Taft Stettinius & Hollister LLP  
2200 IDS Center  
80 South Eighth Street  
Minneapolis, MN 55402  
KStastny@taftlaw.com  
(612) 977-8656

**C. Date of Filing and Proposed Effective Date**

MERC is submitting this filing on April 29, 2022. MERC has calculated the new CCRA factor based on an assumed effective date of January 1, 2023, and assumed 12-month effective period.

**D. Statute Controlling Schedule for Processing the Filing**

Minn. Stat. § 216B.16, subd. 1, allows a utility to place a rate change into effect upon 60 days' notice to the Commission, unless the Commission otherwise orders. Minn. Stat. § 216B.16, subds. 6b-6c further allow public utilities to file rate schedules providing for annual recovery of actual conservation costs and approved incentives. Under Minn. R. 7829.0100, subp. 11, this Petition constitutes a miscellaneous filing because no determination of the Company's general revenue requirement is necessary. Minn. R. 7829.1400, subp. 1, permits initial comments on miscellaneous filings to be made within 30 days of filing with reply comments due 10 days thereafter.

**E. Signature, Electronic Address, and Title of Utility Employee Responsible for the Filing**



Joylyn C. Hoffman Malueg  
Project Specialist 3  
Minnesota Energy Resources Corporation  
231 W. Michigan Street  
Milwaukee, WI 53203  
Joylyn.HoffmanMalueg@wecenergygroup.com

**IV. Description and Purpose of Filing**

**A. Background**

In this Petition, MERC seeks the Commission's approval of its CIP tracker account balances as of December 31, 2021. Additionally, MERC seeks Commission approval of a DSM financial incentive for 2021 in the amount of \$1,250,934, excluding the costs and net benefits associated with approved low-income programs that are not cost-effective, in accordance with Minn. Stat. § 216B.241, subd. 7. MERC also seeks Commission approval of a CCRA credit to customers of \$0.00116 per therm, with a proposed effective date of January 1, 2023.

**B. 2020 CIP Tracker Account and 2021 CIP Tracker Activity**

On April 30, 2021, MERC submitted a petition for approval of its 2020 CIP tracker account activity, DSM financial incentive, and revised CCRA in Docket No. G011/M-21-307. Specifically, MERC requested that the Commission approve the Company's 2020 DSM financial incentive of \$1,345,674; approve MERC's 2020 CIP tracker activity; and approve a revised CCRA of \$0.00046 per therm to be effective January 1, 2022. The Commission approved MERC's 2020 CIP tracker activity and DSM incentive by Order dated October 22, 2021, with the revised CCRA effective January 1, 2022.<sup>1</sup>

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<sup>1</sup> *In the Matter of Minn. Energy Res. Corp. for Approval of 2020 Conservation Improvement Program Tracker Account, Demand-Side Management Financial Incentive, and Conservation Cost Recovery Adjustment Factor*, Docket No. G011/M-21-307, ORDER (Oct. 22, 2021).

The table below provides a summary of activities in the MERC CIP tracker account in 2021.

**MERC-CIP Tracker 2021 Activity**

Beginning Balance – January 1, 2021	(\$971,703.96)
CIP Expenses – January 1, 2021 – December 31, 2021	\$10,931,780.27
Carrying Charges – January 1, 2021 – December 31, 2021	(\$86,498.66)
DSM Financial Incentive	\$1,345,674.00
CIP Recoveries – January 1, 2021 – December 31, 2021	(\$12,007,305.89)
<b>Ending Balance – December 31, 2021</b>	<b>(\$788,054.24)</b>

Attachment A includes MERC's 2021 CIP tracker account activity.

**C. Proposed DSM Financial Incentive**

1. *Calculation of DSM Financial Incentive*

MERC seeks Commission approval of a DSM financial incentive of \$1,250,934 for 2021 based on energy savings of 392,822dekatherms, in accordance with the Commission's December 9, 2020, Order Approving 2021-2023 Parameters for Shared Savings Demand-Side Management Financial Incentive in Docket No. E,G999/CI-08-133.<sup>2</sup> Supporting documentation is provided in Attachment B.

MERC has excluded Next Generation Energy Act assessments in the amount of \$159,192.17 from the calculation of net benefits consistent with the Commission's December 9, 2020, Order Approving 2021-2023 Parameters for Shared Savings Demand-Side Management Financial Incentive in Docket No. E,G999/CI-08-133. Additionally, as discussed in more detail below, MERC has excluded the costs and benefits associated with its Low Income Weatherization and 4U2 programs in accordance with Minn. Stat. § 216B.241, subd. 7(i), as

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<sup>2</sup> *In the Matter of Comm'n Review of Util. Performance Incentives for Energy Conservation Pursuant to Minn. Stat. § 216B.241, Subd. 2c*, Docket No. E,G999/CI-08-133, ORDER APPROVING 2021-2023 PARAMETERS FOR SHARED SAVINGS DEMAND-SIDE MANAGEMENT FINANCIAL INCENTIVE (Dec, 9, 2020).

neither of these approved low-income programs is cost effective under the utility cost test. The Commission approved MERC's 2020 DSM financial incentive that similarly excluded these costs and benefits in its October 22, 2021 Order in Docket No. G-011/M-21-307 and MERC proposes to continue this practice as these programs continued to not be cost effective under the utility cost test.

## 2. *Statutory Criteria*

In Docket No. E,G999/CI-08-133, the Commission adopted a new Shared Savings Model to be used to calculate utility financial incentives for energy conservation starting with the calendar year 2010. On December 9, 2020 the Commission issued an Order Approving 2021-2023 Parameters for Shared Savings Demand-Side Management Financial Incentive in Docket No. E,G999/CI-08-133, approving a shared savings incentive model effective 2021-2023.

Minn. Stat. § 216B.16, subd. 6c(b) sets forth four statutory criteria with respect to approval by the Commission of utility financial incentive plans for energy conservation improvements. MERC's requested DSM financial incentive is consistent with the statutory criteria outlined below. Minn. Stat. § 216B.16, subd. 6c(b) states that in approving incentive plans the Commission shall consider:

- (1) whether the plan is likely to increase utility investment in cost-effective energy conservation;
- (2) whether the plan is compatible with the interest of utility ratepayers and other interested parties;
- (3) whether the plan links the incentive to the utility's performance in achieving cost-effective conservation; and
- (4) whether the plan is in conflict with other provisions of Chapter 216B.

These four criteria are discussed below.

Additionally, Minn. Stat. § 216B.241, subd. 7(i) allows costs and benefits associated with any approved low-income gas or electric conservation improvement program that is not cost-effective when considering the costs and benefits to the utility may, at the discretion of the

utility, be excluded from the calculation of net economic benefits for purposes of calculating the financial incentive to the utility. The energy and demand savings may, at the discretion of the utility, be applied toward the calculation of overall portfolio energy and demand savings for purposes of determining progress toward annual goals and in the financial incentive mechanism. As mentioned above, MERC has excluded the costs and benefits associated with its Low Income Weatherization and 4U2 programs in accordance with this provision and the Commission's August 18, 2020 Order in Docket No. G011/M-20-457 and its October 22, 2021 Order in Docket No. G-011/M-21-307 approving MERC's 2019 and 2020 DSM financial incentive, as neither of these approved low-income programs is cost effective under the utility cost test, as discussed in greater detail below.

- (1) *Whether the plan is likely to increase utility investment in cost-effective energy conservation.*

The modified Shared Savings Model authorizes financial incentives for natural gas utilities that achieve energy savings of at least 0.7 percent of the utility's retail sales. For a utility that achieves energy savings equal to 0.7 percent of retail sales, the utility is awarded a share of net benefits. For each additional 0.1 percent of energy savings the utility achieves, the net benefits awarded increase by an additional 0.75 percent until the utility achieves a savings of 1.2 percent of retail sales. For savings levels of 1.2 percent and higher, the utility is awarded a share of the net benefits equal to the Net Benefits Cap of 10.0 percent.

MERC's incentive is designed to increase the Company's investment in cost-effective energy conservation and consequently results in increased energy and demand savings. The increasing incentives under the plan encourage MERC to seek energy savings, through completed customer conservation measures, at and beyond the 1.5 percent energy savings goal.

- (2) *Whether the plan is compatible with the interest of utility ratepayers and other interested parties.*

MERC's plan is compatible with the interest of utility ratepayers and other interested parties. The incentive is designed to tie the financial incentive to the utility's progress towards meeting its energy savings goal. Additionally, the incentive will not exceed the net benefits created through the savings, and therefore ratepayers receive the majority of the benefits achieved under the Company's CIP program. Specifically, the shared savings DSM incentive plan caps the incentive awarded at 10.0 percent of net benefits in 2021.

(3) *Whether the plan links the incentive to the utility's performance in achieving cost-effective conservation.*

The new shared savings DSM incentive plan links the incentive to the Company's progress toward achieving its energy savings goal, but the incentive awarded will not exceed the net benefits created through savings. The incentive therefore encourages the utility to achieve cost-effective conservation.

(4) *Whether the plan is in conflict with other provisions of Chapter 216B.*

MERC's incentive plan does not conflict with other provisions of Chapter 216B, and is consistent with the Commission's December 9, 2020, Order Approving 2021-2023 Parameters for Shared Savings Demand-Side Management Financial Incentive in Docket No. E,G999/CI-08-133.

(5) *Exclusion of Low-Income Program Costs and Benefits In Accordance with Minn. Stat. § 216B.241, subd. 7.*

Minn. Stat. § 216B.241, subd. 7(e) provides:

The costs and benefits associated with any approved low-income gas or electric conservation improvement program that is not cost-effective when considering the costs and benefits to the utility may, at the discretion of the utility, be excluded from the calculation of net economic benefits for purposes of calculating the financial incentive to the utility. The energy and demand savings may, at the discretion of the utility, be applied toward the calculation of overall portfolio energy and demand savings for purposes of determining progress toward annual goals and in the financial incentive mechanism.



Consistent with this statutory provision, and with the Commission’s October 22, 2021 Order approving its 2020 DSM financial incentive in Docket No. G011/M-21-307, MERC has excluded the costs and benefits associated with its two approved low-income CIP programs—Low Income Weatherization and 4U2—in the calculation of its 2021 CIP incentive, as neither of these two programs is cost-effective when considering the costs and benefits to the utility. In particular, under the utility cost test, these approved low-income programs achieve the following benefit-cost test results for 2021:

Program	Utility Cost Test Results (2021)
Low Income Weatherization	0.48
4U2	0.50

As neither of these programs is cost effective when considering the costs and benefits to the utility, MERC is electing, consistent with Minn. Stat. § 216B.241, subd. 7(e) to exclude the costs and benefits of these programs from the calculation of net economic benefits for purposes of calculating the financial incentive to the utility. Also in accordance with Minn. Stat. § 216B.241, subd. 7(e), the savings attributable to these programs is applied toward the calculation of overall portfolio energy and demand savings for purposes of determining progress toward annual goals and in the financial incentive mechanism. As reflected in Attachment B to this filing, MERC has calculated its 2021 CIP incentive excluding both of these low-income programs’ 2021 spending and net benefits.

#### **D. Proposed CCRA**

In the Company’s 2008 rate case, the Commission approved a CCRA for the Company with an initial rate of \$0.0000 per therm and required the Company to file adjustment reports by May 1 of each calendar year. The current CCRA factor of \$0.00046 was approved by the Commission by Order dated October 22, 2021, in Docket No. G011/M-21-307, and was effective January 1, 2022.

MERC's tracker balance as of January 1, 2022, is an over-recovery of \$788,054.24. The estimated MERC CIP tracker balance as of December 31, 2023, based on anticipated expense and collections via the conservation cost recovery charge ("CCRC"), is an under-collection of \$496,077. As a result, MERC proposes to set the CCRA factor to \$0.00116 per therm effective January 1, 2023 to collect the under-collection balance forecasted on the CIP tracker through 2023. As shown in Attachment C, setting the CCRA to \$0.00116 on January 1, 2023, is projected to collect the forecasted CIP tracker under-recovery of \$496,077 currently projected as of December 31, 2023.

Included as Attachment D are proposed redline changes to MERC's Tariff Sheet No. 7.02a, incorporating the proposed modified CCRA rate. The Company proposes to implement the bill message below, effective the first month the new CCRA factor takes effect, notifying customers of the change in their monthly bills:

Effective January 1, 2023, the CCRA (conservation cost recovery adjustment) has been revised to \$0.00116 per therm. The CCRA is an annual adjustment to true-up under-recovery or over-recovery of CIP (conservation improvement program) expenses.

#### **E. Effect of Change on MERC Revenue**

This Petition has no effect on MERC's revenue. The CCRA is forecasted to collect the difference between the CIP expenses actually recovered through the CCRC and the CIP tracker account balance as of January 2023 over approximately one year. In particular, as shown in Attachment C, setting the CCRA to \$0.00116 on January 1, 2023, is projected to recover the tracker balance of \$496,077 projected as of December 31, 2023.

#### **F. CIP-Exempt Customer Billing Review**

In its October 28, 2014, Findings of Fact, Conclusions, and Order in Docket No. G011/GR-13-617, the Commission ordered MERC to make annual compliance filings with future

CIP tracker filings documenting that its CIP-exempt customers have been properly identified and are being properly billed.<sup>3</sup>

Since the imposition of this requirement, MERC has continued to conduct monthly reviews of a sample of customer bills, across all bill classes, to ensure proper billing of CIP charges. MERC has also committed to review all CIP-exempt rate codes on a quarterly basis to ensure customers who are treated as CIP-exempt have received an exemption. Based on MERC's continued review, all customers on CIP-exempt rate codes have a valid exemption on file and no additional billing issues have been identified.

### **CONCLUSION**

MERC respectfully requests that the Commission approve its CIP tracker account balances for 2021 with an ending balance of (\$788,054.24). Additionally, MERC requests that the Commission approve a consolidated 2021 DSM financial incentive of \$1,250,934. Finally, MERC requests approval to set the CCRA factor to \$0.00116 per therm effective January 1, 2023.

Dated: April 29, 2022

Respectfully submitted,

TAFT STETTINIUS & HOLLISTER LLP

By: /s/ Kristin M. Stastny

Kristin M. Stastny

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Attorney for Minnesota Energy  
Resources Corporation

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<sup>3</sup> *In the Matter of a Petition by Minn. Energy Res. Corp. for Auth. To Increase Nat. Gas Rates in Minn.*, Docket No. G011/GR-13-617, FINDINGS OF FACT, CONCLUSIONS, AND ORDER at 10 (Oct. 28, 2014).

**STATE OF MINNESOTA  
BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION**

Katie J. Sieben  
Valerie Means  
Matthew Schuerger  
Joseph K. Sullivan  
John A. Tuma

Chair  
Commissioner  
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In the Matter of the Petition of Minnesota  
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of the 2021 Conservation Improvement  
Program Tracker Account, Demand-Side  
Management Financial Incentive, and  
Conservation Cost Recovery Adjustment  
Factor

Docket No. G011/M-22-\_\_\_\_

**SUMMARY OF FILING**

Please take notice that on April 29, 2022, Minnesota Energy Resources Corporation submitted to the Minnesota Public Utilities Commission ("Commission") a Petition for Approval of its 2021 Conservation Improvement Program tracker account balance, 2021 Demand-Side Management financial incentive, and Conservation Cost Recovery Adjustment factor.

Please note that this filing is available through the eDockets system maintained by the Minnesota Department of Commerce ("Department") and the Commission. You can access this document by going to eDockets through the websites of the Department or the Commission or by going to the eDockets homepage at:

<https://efiling.web.commerce.state.mn.us/edockets/searchDocuments.do?method=eDocketsResult&userType=public>. Once on the eDockets homepage, this document can be accessed through the "Search Documents" link and by entering the date of the filing.

# **Attachment A**

2021 CIP Tracker

Minnesota Energy Resources  
CIP Tracker Balance Calculation  
As of 12/31/21

	PY Ending Balance	January	February	March	April	May	June	July	August	September	October	November	December	CY Total
Beginning Balance														
1. (excl. carry cost through July 2015) Acquired IPL tracker balance		(971,703.96)	(1,499,734.19)	(2,539,163.54)	(3,540,569.75)	(3,698,033.95)	(3,807,940.42)	(3,343,330.68)	(2,918,558.47)	(2,374,708.12)	(2,062,685.72)	(1,774,009.10)	(572,597.33)	(971,703.96)
2. Expenses		908,867.81	942,843.02	830,290.31	1,013,534.47	780,940.69	994,008.75	852,967.30	940,285.03	733,957.33	806,477.83	777,404.90	1,350,202.83	10,931,780.27
3. Recoveries		(1,432,412.29)	(1,974,677.67)	(1,821,106.58)	(1,159,937.75)	(879,457.50)	(519,399.02)	(419,465.61)	(389,331.86)	(415,765.38)	(512,495.10)	(919,954.47)	(1,563,302.65)	(12,007,305.89)
4. Incentives												1,345,674.00		1,345,674.00
Subtotal Balance														
5. Line 1+2-3+4)		(1,495,248.44)	(2,531,568.83)	(3,529,979.81)	(3,686,973.04)	(3,796,550.76)	(3,333,330.69)	(2,909,828.99)	(2,367,605.31)	(2,056,516.17)	(1,768,702.99)	(570,884.67)	(785,697.15)	(701,555.58)
6. Monthly Carry Cost **		(4,485.75)	(7,594.71)	(10,589.94)	(11,060.92)	(11,389.65)	(9,999.99)	(8,729.49)	(7,102.82)	(6,169.55)	(5,306.11)	(1,712.65)	(2,357.09)	(86,498.66)
Ending Balance														
7 (Line 5+6)	(971,703.96)	(1,499,734.19)	(2,539,163.54)	(3,540,569.75)	(3,698,033.95)	(3,807,940.42)	(3,343,330.68)	(2,918,558.47)	(2,374,708.12)	(2,062,685.72)	(1,774,009.10)	(572,597.33)	(788,054.24)	(788,054.24)

\*\* Carry Cost charge:

3.6000% annual rate  
12 months  
0.00300000 monthly rate

Effective in August 2015, carrying charges are based on the total net tracker balance inclusive of carrying charges

Minnesota Energy Resources  
 CCRC Recovery by Class (in therms)  
 As of 12/31/21

CCRC:	January	February	March	April	May	June	July	August	September	October	November	December	YTD
Gas Residential	31,871,673	33,331,412	29,704,748	17,115,182	12,724,772	5,684,751.70	3,550,870	2,911,141	3,022,116	3,951,500	11,331,535	24,618,120	179,817,819
Gas Small C&I	1,343,805	1,745,060	1,456,671	787,904	537,522.60	196,659.40	119,435	66,554	90,669	334,497	745,624	1,144,197	8,568,599
Gas Large C&I	16,429,654	17,412,937	17,042,143	10,037,234	7,186,594.10	3,667,801.90	2,684,093	2,364,120	2,672,855	5,017,618	7,778,577	13,991,631	106,285,258
Gas Large C&I Int.	3,249,647	3,504,596	2,606,041	1,907,493	1,364,847.90	764,951.60	530,981	782,999	678,835	1,016,031	2,239,905	3,152,871	21,799,197
Transport of Gas	9,085,593	9,780,820	9,454,860	8,624,734	7,356,184.30	6,916,205.80	7,031,060	6,793,061	7,330,316	6,682,374	8,417,759	8,944,233	96,417,200
Total Therms	61,980,372	65,774,824	60,264,462	38,472,547	29,169,921	17,230,370	13,916,439	12,917,874	13,794,791	17,002,020	30,513,400	51,851,052	412,888,072
CCRC rate *	0.02953	0.02953	0.02953	0.02953	0.02953	0.02953	0.02953	0.02953	0.02953	0.02953	0.02953	0.02953	0.02953
CCRC Recovery	\$ 1,830,280.38	\$ 1,942,330.56	\$ 1,779,609.56	\$ 1,136,094.30	\$ 861,387.78	\$ 508,812.84	\$ 410,952.45	\$ 381,464.83	\$ 407,360.17	\$ 502,069.66	\$ 901,060.69	\$ 1,531,161.55	\$ 12,192,584.77

\* CCRC Final rate effective Jan 1, 2018

**Minnesota Energy Resources**  
**CCRA Recovery by Class (in therms)**  
**As of 12/31/21**

CCRA:	January**	February**	March	April	May	June	July	August	September	October	November	December	YTD
Gas Residential	31,858,749	33,139,033	29,699,625	17,102,181	12,703,747	5,579,782	3,382,211	2,697,504	2,799,776	3,781,368	11,298,930	24,609,154	178,652,060
Gas Small C&I	1,343,436	1,736,932	1,455,387	785,237	533,863	186,369	110,615	59,350	83,314	325,447	739,778	1,142,695	8,502,420
Gas Large C&I	16,428,066	17,373,509	17,042,110	10,037,531	7,186,089	3,627,242	2,676,101	2,355,906	2,637,654	5,010,041	7,777,461	13,991,538	106,143,247
Gas Large C&I Int.	3,249,647	3,501,380	2,606,041	1,907,493	1,364,831	764,895	530,929	782,957	705,746	1,016,000	2,239,905	3,152,871	21,822,695
Transport of Gas	9,085,593	9,780,820	9,454,860	8,624,734	7,356,184	6,916,206	7,031,042	6,793,051	7,330,302	6,682,374	8,417,759	8,944,233	96,417,157
Total Therms	61,965,490	65,531,674	60,258,021	38,457,176	29,144,714	17,074,494	13,730,897	12,688,768	13,556,792	16,815,230	30,473,832	51,840,490	411,537,580
CCRA rate *	0.00062	0.00062	0.00062	0.00062	0.00062	0.00062	0.00062	0.00062	0.00062	0.00062	0.00062	0.00062	635,920,679
Diff in Open C & Calc**	(436,286.69)	(8,282.53)	4,137.05										
CCRA Recovery	\$ (397,868.09)	\$ 32,347.11	\$ 41,497.02	\$ 23,843.45	\$ 18,069.72	\$ 10,586.19	\$ 8,513.16	\$ 7,867.04	\$ 8,405.21	\$ 10,425.44	\$ 18,893.78	\$ 32,141.10	\$ (185,278.88)

CCRA = Conservation Cost Recovery Adjustment

\*Rate changed 1/1/21

\*\*Entries booked based on actual CCRA billings.



## **Attachment B**

2021 DSM Incentive

Conservation Improvement Program (CIP)

BENEFIT COST FOR GAS CIPS-- Cost-Effectiveness Analysis

Company: **Minnesota Energy Resources**  
Project: **Total Portfolio w/ CIP**  
**BENCOST - Portfolio**

Input Data		2021
1) Retail Rate (\$/Dth) =	\$6.57	
Escalation Rate =	4.69%	
2) Non-Gas Fuel Retail Rate (\$/Fuel Unit) =	\$0.00	
Escalation Rate =	3.59%	
Non-Gas Fuel Units (ie. kWh,Gallons, etc) =	kWh	
3) Commodity Cost (\$/Dth) =	\$3.25	
Escalation Rate =	4.69%	
4) Demand Cost (\$/Dth/Yr) =	\$131.24	
Escalation Rate =	4.69%	
5) Peak Reduction Factor =	1.00%	
6) Variable O&M (\$/Dth) =	\$0.05	
Escalation Rate =	4.69%	
7) Non-Gas Fuel Cost (\$/Fuel Unit) =	\$0.02657	
Escalation Rate =	3.59%	
8) Non-Gas Fuel Loss Factor	7.70%	
9) Gas Environmental Damage Factor (\$/Dth) =	\$2.07	
Escalation Rate =	2.30%	
10) Non Gas Fuel Enviro. Damage Factor (\$/Unit) =	\$0.01984	
Escalation Rate =	2.30%	
11) Participant Discount Rate =	3.02%	
12) CIP Utility Discount Rate =	5.57%	
13) Societal Discount Rate =	3.02%	
14) General Input Data Year =	2020	
15a) Project Analysis Year 1 =	2021	
15b) Project Analysis Year 2 =	2022	
15c) Project Analysis Year 3 =	2023	
16 Utility Project Costs		
16 a) Administrative & Operating Costs =		\$6,589,634
16 b) Incentive Costs =		\$4,182,954
16 c) Total Utility Project Costs =		\$10,772,588
17) Direct Participant Costs (\$/Part.) =		\$158
18) Participant Non-Energy Costs (Annual \$/Part.) =		\$0.00
Escalation Rate =		2.30%
19) Participant Non-Energy Savings (Annual \$/Part) =		\$0.00
Escalation Rate =		2.30%
20) Project Life (Years) =		13.47
21) Avg. Dth/Part. Saved =		4.37
22) Avg Non-Gas Fuel Units/Part. Saved =		0 kWh
22a) Avg Additional Non-Gas Fuel Units/ Part. Used =		0 kWh
23) Number of Participants =		99,751
24) Total Annual Dth Saved =		435,831
25) Incentive/Participant =		\$41.93

Cost Summary	2021	Test Results	2021 NPV	2021 B/C
Utility Cost per Participant =	\$107.99	Ratepayer Impact Measure Test	(\$21,980,828)	0.55
Cost per Participant per Dth =	60.80802049	Utility Cost Test	\$15,600,231	2.45
Lifetime Energy Reduction (Dth)	5,868,550	Societal Test	\$22,043,448	1.99
Societal Cost per Dth	3.803167013	Participant Test	\$35,111,505	3.23

Conservation Improvement Program (CIP)

BENEFIT COST FOR GAS CIPS-- Cost-Effectiveness Analysis

Company: **Minnesota Energy Resources**  
Project: **Total Portfolio w/ CIP**  
**BENCOST - LIW**

Input Data		2021
1) Retail Rate (\$/Dth) =	\$6.57	
Escalation Rate =	4.69%	
2) Non-Gas Fuel Retail Rate (\$/Fuel Unit) =	\$0.00	
Escalation Rate =	3.59%	
Non-Gas Fuel Units (ie. kWh,Gallons, etc) =	kWh	
3) Commodity Cost (\$/Dth) =	\$3.25	
Escalation Rate =	4.69%	
4) Demand Cost (\$/Dth/Yr) =	\$131.24	
Escalation Rate =	4.69%	
5) Peak Reduction Factor =	1.00%	
6) Variable O&M (\$/Dth) =	\$0.05	
Escalation Rate =	4.69%	
7) Non-Gas Fuel Cost (\$/Fuel Unit) =	\$0.02657	
Escalation Rate =	3.59%	
8) Non-Gas Fuel Loss Factor	7.70%	
9) Gas Environmental Damage Factor (\$/Dth) =	\$2.07	
Escalation Rate =	2.30%	
10) Non Gas Fuel Enviro. Damage Factor (\$/Unit) =	\$0.01984	
Escalation Rate =	2.30%	
11) Participant Discount Rate =	3.02%	
12) CIP Utility Discount Rate =	5.57%	
13) Societal Discount Rate =	3.02%	
14) General Input Data Year =	2020	
15a) Project Analysis Year 1 =	2021	
15b) Project Analysis Year 2 =	2022	
15c) Project Analysis Year 3 =	2023	
16 Utility Project Costs		
16 a) Administrative & Operating Costs =		\$324,422
16 b) Incentive Costs =		\$0
16 c) Total Utility Project Costs =		\$324,422
17) Direct Participant Costs (\$/Part.) =		\$0
18) Participant Non-Energy Costs (Annual \$/Part.) =		\$0.00
Escalation Rate =		2.30%
19) Participant Non-Energy Savings (Annual \$/Part) =		\$0.00
Escalation Rate =		2.30%
20) Project Life (Years) =		23.34
21) Avg. Dth/Part. Saved =		11.41
22) Avg Non-Gas Fuel Units/Part. Saved =		0 kWh
22a) Avg Additional Non-Gas Fuel Units/ Part. Used =		0 kWh
23) Number of Participants =		133
24) Total Annual Dth Saved =		1,517
25) Incentive/Participant =		\$0.00

Cost Summary	2021	Test Results	2021 NPV	2021 B/C
Utility Cost per Participant =	\$2,439.26	Ratepayer Impact Measure Test	(\$390,532)	0.28
Cost per Participant per Dth =	213.8153958	Utility Cost Test	(\$168,867)	0.48
Lifetime Energy Reduction (Dth)	35,408	Societal Test	(\$48,745)	0.85
Societal Cost per Dth	9.162395504	Participant Test	\$303,009 n/a	

Conservation Improvement Program (CIP)

BENEFIT COST FOR GAS CIPS-- Cost-Effectiveness Analysis

Company: **Minnesota Energy Resources**  
Project: **Total Portfolio w/ CIP**  
**BENCOST - 4U2**

Input Data		2021
1) Retail Rate (\$/Dth) =	\$6.57	
Escalation Rate =	4.69%	
2) Non-Gas Fuel Retail Rate (\$/Fuel Unit) =	\$0.00	
Escalation Rate =	3.59%	
Non-Gas Fuel Units (ie. kWh,Gallons, etc) =	kWh	
3) Commodity Cost (\$/Dth) =	\$3.25	
Escalation Rate =	4.69%	
4) Demand Cost (\$/Dth/Yr) =	\$131.24	
Escalation Rate =	4.69%	
5) Peak Reduction Factor =	1.00%	
6) Variable O&M (\$/Dth) =	\$0.05	
Escalation Rate =	4.69%	
7) Non-Gas Fuel Cost (\$/Fuel Unit) =	\$0.02657	
Escalation Rate =	3.59%	
8) Non-Gas Fuel Loss Factor	7.70%	
9) Gas Environmental Damage Factor (\$/Dth) =	\$2.07	
Escalation Rate =	2.30%	
10) Non Gas Fuel Enviro. Damage Factor (\$/Unit) =	\$0.01984	
Escalation Rate =	2.30%	
11) Participant Discount Rate =	3.02%	
12) CIP Utility Discount Rate =	5.57%	
13) Societal Discount Rate =	3.02%	
14) General Input Data Year =	2020	
15a) Project Analysis Year 1 =	2021	
15b) Project Analysis Year 2 =	2022	
15c) Project Analysis Year 3 =	2023	
16 Utility Project Costs		
16 a) Administrative & Operating Costs =		\$1,005,632
16 b) Incentive Costs =		\$0
16 c) Total Utility Project Costs =		\$1,005,632
17) Direct Participant Costs (\$/Part.) =		\$0
18) Participant Non-Energy Costs (Annual \$/Part.) =		\$0.00
Escalation Rate =		2.30%
19) Participant Non-Energy Savings (Annual \$/Part) =		\$0.00
Escalation Rate =		2.30%
20) Project Life (Years) =		19.45
21) Avg. Dth/Part. Saved =		20.33
22) Avg Non-Gas Fuel Units/Part. Saved =		0 kWh
22a) Avg Additional Non-Gas Fuel Units/ Part. Used =		0 kWh
23) Number of Participants =		286
24) Total Annual Dth Saved =		5,813
25) Incentive/Participant =		\$0.00

Cost Summary	2021	Test Results	2021 NPV	2021 B/C
Utility Cost per Participant =	\$3,516.19	Ratepayer Impact Measure Test	(\$1,220,212)	0.29
Cost per Participant per Dth =	172.9855377	Utility Cost Test	(\$500,726)	0.50
Lifetime Energy Reduction (Dth)	113,077	Societal Test	(\$144,458)	0.86
Societal Cost per Dth	8.893317023	Participant Test	\$935,068 n/a	

**2021**

Minnesota Energy Resources Corporation - Conservation Improvement Program Incentive

Instructions:

1.) Yellow highlighted fields must be updated by the utility

<b>Inputs</b>	
2017 Weather-Normalized Sales (Dth)	42,269,338
2018 Weather-Normalized Sales (Dth)	43,296,161
2019 Weather-Normalized Sales (Dth)	46,575,519
3-year Weather-Normalized Sales Average (Dth)	44,047,006
1.0% Energy Savings	440,470
Increase Energy Savings per 0.1% Increase in Achievement Level	44,047
Approved CIP Budget	\$12,506,619
Approved CIP Energy Savings Goal (Dth)	440,976
Estimated Net Benefits at Energy Savings Goal	\$15,863,136
Energy savings at 1.5% (Dth)	660,705

Location:

From Commissioner's Order approving 2021-2023 Triennial CIP Filing

<b>Incentive Calibration</b>	
Max Percent of Net Benefits Awarded	10.0%
Max Percent of Expenditures Awarded	30.0%
Earning Threshold	0.7%
Achievement Level Where Net Benefits Cap Begins	1.2%
Increase in Net Benefits Awarded Per 0.1% Increase in Achievement Level	7.5 % Points

maximum net benefits awarded

<b>Actual 2021 Achievements</b>	
Expenditures	\$9,601,727
Energy Saved (first year Dth saved)	392,822
Net Benefits Achieved	\$16,269,824

<b>Shared Savings Incentive Results</b>	
Achievement Level	0.89%
Percent of Net Benefits Awarded	7.6887%
Financial Incentive Award	\$1,250,934
Incentive/First Year Dth Saved \$	\$3.1845
Incentive/Net Benefits	7.69%
Incentive/CIP Expenditures	13.03%

**Estimated Incentive Levels by Achievement Level**

Achievement Level (% of sales)	Energy Saved	Percent of Net Benefits Awarded	Estimated Net Benefits Achieved	Incentive Award	Average Incentive per unit Saved	Incremental Incentive Units Saved
0.0%	0	0.00%	\$0	\$0	\$0.000	-
0.1%	44,047	0.00%	\$1,584,493	\$0	\$0.000	\$0.000
0.2%	88,094	0.00%	\$3,168,986	\$0	\$0.000	\$0.000
0.3%	132,141	0.00%	\$4,753,479	\$0	\$0.000	\$0.000
0.4%	176,188	0.00%	\$6,337,972	\$0	\$0.000	\$0.000
0.5%	220,235	0.00%	\$7,922,465	\$0	\$0.000	\$0.000
0.6%	264,282	0.00%	\$9,506,958	\$0	\$0.000	\$0.000
0.7%	308,329	6.25%	\$11,091,451	\$693,216	\$2.248	\$15.738
0.8%	352,376	7.00%	\$12,675,944	\$887,316	\$2.518	\$4.407
0.9%	396,423	7.75%	\$14,260,437	\$1,105,184	\$2.788	\$4.946
1.0%	440,470	8.50%	\$15,844,929	\$1,346,819	\$3.058	\$5.486
1.1%	484,517	9.25%	\$17,429,422	\$1,612,222	\$3.327	\$6.025
1.2%	528,564	10.00%	\$19,013,915	\$1,901,392	\$3.597	\$6.565
1.3%	572,611	10.00%	\$20,598,408	\$2,059,841	\$3.597	\$3.597
1.4%	616,658	10.00%	\$22,182,901	\$2,218,290	\$3.597	\$3.597
1.5%	660,705	10.00%	\$23,767,394	\$2,376,739	\$3.597	\$3.597
1.6%	704,752	10.00%	\$25,351,887	\$2,535,189	\$3.597	\$3.597
1.7%	748,799	10.00%	\$26,936,380	\$2,693,638	\$3.597	\$3.597
1.8%	792,846	10.00%	\$28,520,873	\$2,852,087	\$3.597	\$3.597
1.9%	836,893	10.00%	\$30,105,366	\$3,010,537	\$3.597	\$3.597
2.0%	880,940	10.00%	\$31,689,859	\$3,168,986	\$3.597	\$3.597
2.1%	924,987	10.00%	\$33,274,352	\$3,327,435	\$3.597	\$3.597
2.2%	969,034	10.00%	\$34,858,845	\$3,485,884	\$3.597	\$3.597
2.3%	1,013,081	10.00%	\$36,443,338	\$3,644,334	\$3.597	\$3.597
2.4%	1,057,128	10.00%	\$38,027,831	\$3,802,783	\$3.597	\$3.597
2.5%	1,101,175	10.00%	\$39,612,324	\$3,961,232	\$3.597	\$3.597
2.6%	1,145,222	10.00%	\$41,196,817	\$4,119,682	\$3.597	\$3.597
2.7%	1,189,269	10.00%	\$42,781,310	\$4,278,131	\$3.597	\$3.597
2.8%	1,233,316	10.00%	\$44,365,803	\$4,436,580	\$3.597	\$3.597
2.9%	1,277,363	10.00%	\$45,950,295	\$4,595,030	\$3.597	\$3.597
3.0%	1,321,410	10.00%	\$47,534,788	\$4,753,479	\$3.597	\$3.597

## **Attachment C**

CCRA Calculation

MERC  
CCRA Calculation  
To Be Effective January 1, 2023

Forecasted beginning balance (January 1, 2023)	\$ (2,009,778.00)
Proposed Expenditures (January 2023-December 2023)*	\$12,589,871
Forecasted 2021 Incentive (to be approved in 2022)	\$1,250,934
Forecasted 2022 Incentive (based on approved 2021-2023 Plan)	\$1,403,316
Less forecasted CCRC recovery (January 2023-December 2023)	\$ 12,622,239
Projected carrying charges for 2023	\$ (116,027)
Forecasted December 2023 Balance	\$ 496,077
Forecasted gas sales (January 2023-December 2023) Therms	427,437,814
CCRA=\$/therm beginning January 1, 2023	\$ 0.00116

\*based on approved 2021-2023 CIP Plan, Docket No. G011/CIP-20-479

## **Attachment D**

Revised Tariff Sheets



**CONSERVATION COST RECOVERY CHARGE AND ADJUSTMENT**

109th Revised Sheet No. 7.02a

All Classes MERC

\$0.00~~116046~~\*

\*Approved effective January 1, 202~~32~~ in Docket No. G011/M-22-~~1-307~~

5. Exemption: For those customer accounts granted an exemption by the Commissioner of the Minnesota Department of Commerce (or successor agency) from Conservation Improvement Program (CIP) costs pursuant to Minnesota Statutes section 216B.241, the CCRC and CCRA shall not apply. Those customer accounts determined by the Commission to qualify as a Large Energy Facility Customers, shall receive a monthly exemption from conservation program charges pursuant to Minn. Stat. § 216B.16, subd. 6b Energy Conservation Improvement. Upon exemption from conservation program charges, the Large Energy Facility customers can no longer participate in any utility's energy Conservation Improvement Program.

Under Minn. Stat. 216B.241, any customer account determined by the Commission of the Minnesota Department of Commerce to qualify as a large customer facility shall be exempt from CIP investment and expenditure requirements with respect to retail revenues attributable to the large customer facility. Customer accounts granted exemption by a decision of the Commissioner after the beginning of the calendar year shall be credited for any CIP collections billed after January first of the year following the Commissioner's decision. Upon exemption from the conservation program charges, no exempt customer facility may participate in a utility conservation improvement program unless the owner of the facility submits a filing with the Commissioner to withdraw its exemption.

Under Minn. Stat. 216B.241, any customer account that is not a large customer facility and that purchases or acquires natural gas from a public utility having fewer than 600,000 natural gas customers in Minnesota shall, upon a determination by the Commissioner of the Department of Commerce as qualifying for an opt out of the Conservation Improvement Program, be exempt from CIP investment and expenditure requirements with respect to retail revenues attributable to the commercial gas customers. Customer accounts granted exemption by a decision of the Commissioner after the beginning of the calendar year shall be credited for any CIP collections billed after January first of the year following the Commissioner's decision. Upon exemption from conservation program charges, the customers can no longer participate in any utility's energy Conservation Improvement Program unless the customer submits a filing with the Commissioner to withdraw its exemption.

6. Accounting Requirements: The Company is required to record all costs associated with the conservation program in a CIP Tracker Account. All revenues recovered through the CCRA are booked to the Tracker as an offset to expenses.

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**CONSERVATION COST RECOVERY CHARGE AND ADJUSTMENT**

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10th Revised Sheet No. 7.02a

All Classes MERC

\$0.00116\*

\*Approved effective January 1, 2023 in Docket No. G011/M-22-\_\_\_\_

5. Exemption: For those customer accounts granted an exemption by the Commissioner of the Minnesota Department of Commerce (or successor agency) from Conservation Improvement Program (CIP) costs pursuant to Minnesota Statutes section 216B.241, the CCRC and CCRA shall not apply. Those customer accounts determined by the Commission to qualify as a Large Energy Facility Customers, shall receive a monthly exemption from conservation program charges pursuant to Minn. Stat. § 216B.16, subd. 6b Energy Conservation Improvement. Upon exemption from conservation program charges, the Large Energy Facility customers can no longer participate in any utility's energy Conservation Improvement Program.

Under Minn. Stat. 216B.241, any customer account determined by the Commission of the Minnesota Department of Commerce to qualify as a large customer facility shall be exempt from CIP investment and expenditure requirements with respect to retail revenues attributable to the large customer facility. Customer accounts granted exemption by a decision of the Commissioner after the beginning of the calendar year shall be credited for any CIP collections billed after January first of the year following the Commissioner's decision. Upon exemption from the conservation program charges, no exempt customer facility may participate in a utility conservation improvement program unless the owner of the facility submits a filing with the Commissioner to withdraw its exemption.

Under Minn. Stat. 216B.241, any customer account that is not a large customer facility and that purchases or acquires natural gas from a public utility having fewer than 600,000 natural gas customers in Minnesota shall, upon a determination by the Commissioner of the Department of Commerce as qualifying for an opt out of the Conservation Improvement Program, be exempt from CIP investment and expenditure requirements with respect to retail revenues attributable to the commercial gas customers. Customer accounts granted exemption by a decision of the Commissioner after the beginning of the calendar year shall be credited for any CIP collections billed after January first of the year following the Commissioner's decision. Upon exemption from conservation program charges, the customers can no longer participate in any utility's energy Conservation Improvement Program unless the customer submits a filing with the Commissioner to withdraw its exemption.

6. Accounting Requirements: The Company is required to record all costs associated with the conservation program in a CIP Tracker Account. All revenues recovered through the CCRA are booked to the Tracker as an offset to expenses.

In the Matter of the Petition of Minnesota  
Energy Resources Corporation for Approval  
of the 2021 Conservation Improvement  
Program Tracker Account, Demand-Side  
Management Financial Incentive, and  
Conservation Cost Recovery Adjustment  
Factor

Docket No. G011/M-22-\_\_\_\_\_

**CERTIFICATE OF SERVICE**

I, Kristin M. Stastny, hereby certify that on the 29th day of April, 2022 on behalf of Minnesota Energy Resources Corporation (MERC), I electronically filed a true and correct copy of the enclosed Petition on [www.edockets.state.mn.us](http://www.edockets.state.mn.us). Said documents were also served via U.S. mail and electronic service as designated on the attached service list.

Dated this 29th day of April, 2022.

/s/ Kristin M. Stastny  
Kristin M. Stastny

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Michael	Ahern	ahern.michael@dorsey.com	Dorsey & Whitney, LLP	50 S 6th St Ste 1500  Minneapolis, MN 554021498	Electronic Service	No	GEN_SL_Minnesota Energy Resources Corporation_General Service List
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400  St. Paul, MN 55101	Electronic Service	No	GEN_SL_Minnesota Energy Resources Corporation_General 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	GEN_SL_Minnesota Energy Resources Corporation_General Service List
Daryll	Fuentes	energy@usg.com	USG Corporation	550 W Adams St  Chicago, IL 60661	Electronic Service	No	GEN_SL_Minnesota Energy Resources Corporation_General Service List
Joylyn C	Hoffman Malueg	Joylyn.hoffmanmalueg@wecenergygroup.com	Minnesota Energy Resources	2685 145th St W  Rosemount, MN 55068	Electronic Service	No	GEN_SL_Minnesota Energy Resources Corporation_General Service List
Brian	Meloy	brian.meloy@stinson.com	STINSON LLP	50 S 6th St Ste 2600  Minneapolis, MN 55402	Electronic Service	No	GEN_SL_Minnesota Energy Resources Corporation_General Service List
Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP	33 South Sixth St Ste 4200  Minneapolis, MN 55402	Electronic Service	No	GEN_SL_Minnesota Energy Resources Corporation_General Service List
Catherine	Phillips	Catherine.Phillips@wecenergygroup.com	Minnesota Energy Resources	231 West Michigan St  Milwaukee, WI 53203	Electronic Service	No	GEN_SL_Minnesota Energy Resources Corporation_General 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	GEN_SL_Minnesota Energy Resources Corporation_General Service List
Elizabeth	Schmiesing	eschmiesing@winthrop.com	Winthrop & Weinstine, P.A.	225 South Sixth Street Suite 3500 Minneapolis, MN 55402	Electronic Service	No	GEN_SL_Minnesota Energy Resources Corporation_General Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th PI E Ste 350  Saint Paul, MN 55101	Electronic Service	No	GEN_SL_Minnesota Energy Resources Corporation_General Service List
Colleen	Sipiorski	Colleen.Sipiorski@wecenergygroup.com	Minnesota Energy Resources Corporation	700 North Adams St  Green Bay, WI 54307	Electronic Service	No	GEN_SL_Minnesota Energy Resources Corporation_General Service List
Richard	Stasik	richard.stasik@wecenergygroup.com	Minnesota Energy Resources Corporation (HOLDING)	231 West Michigan St - P321  Milwaukee, WI 53203	Electronic Service	No	GEN_SL_Minnesota Energy Resources Corporation_General Service List
Kristin	Stastny	kstastny@taftlaw.com	Taft Stettinius & Hollister LLP	2200 IDS Center 80 South 8th St Minneapolis, MN 55402	Electronic Service	No	GEN_SL_Minnesota Energy Resources Corporation_General Service List
Eric	Swanson	eswanson@winthrop.com	Winthrop & Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	GEN_SL_Minnesota Energy Resources Corporation_General Service List
Tina E	Wuyts	tina.wuyts@wecenergygroup.com	Minnesota Energy Resources Corporation	PO Box 19001 700 N Adams St Green Bay, WI 54307-9001	Electronic Service	No	GEN_SL_Minnesota Energy Resources Corporation_General 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	SPL_SL_CIP SPECIAL SERVICE LIST
Lisa	Beckner	lbeckner@mnpower.com	Minnesota Power	30 W Superior St  Duluth, MN 55802	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
William	Black	bblack@mmua.org	MMUA	Suite 200 3131 Fernbrook Lane North  Plymouth, MN 55447	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
Christina	Brusven	cbrusven@fredlaw.com	Fredrikson Byron	200 S 6th St Ste 4000  Minneapolis, MN 554021425	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
Charlie	Buck	charlie.buck@oracle.com	Oracle	760 Market St FL 4  San Francisco, CA 94102	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
Ray	Choquette	rchoquette@agp.com	Ag Processing Inc.	12700 West Dodge Road PO Box 2047 Omaha, NE 68103-2047	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
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	No	SPL_SL_CIP SPECIAL SERVICE LIST
George	Crocker	gwilic@nawo.org	North American Water Office	PO Box 174  Lake Elmo, MN 55042	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
Patrick	Deal	pdeal@mnchamber.com	Minnesota Chamber of Commerce	400 Robert St N Ste 1500  Saint Paul, MN 55101	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
Steve	Downer	sdowner@mmua.org	MMUA	3025 Harbor Ln N Ste 400  Plymouth, MN 554475142	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
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@mnchamber.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@greenergy.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
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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
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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



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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
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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
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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

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