



Minnesota Energy Resources Corporation
2665 145th Street West
Box 455
Rosemount, MN 55068-0455

February 13, 2015

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

Re: Corrections to 30-Day Compliance Filing and Additional Information

In the Matter of the Application of Minnesota Energy Resources Corporation for Authority to
Increase Rates for Natural Gas Service in Minnesota; Docket No. G-011/GR-13-617

Dear Mr. Wolf:

On January 21, 2015, Minnesota Energy Resources Corporation (MERC) filed its 30-day compliance filing in accordance with the Minnesota Public Utilities Commission's October 28, 2014, Findings of Fact, Conclusions of Law, and Order in the above-referenced docket. MERC submits this filing to correct errors that were identified in that filing with respect to Schedules B (tariff sheets) and F (CIP Tracker Account).

Following submission of its 30-day compliance filing, MERC became aware of four errors in its filed tariffs. First, the base cost of gas on tariff sheet number 5.10 should be listed at \$0.43407. Second, tariff sheet 7.19 did not incorporate the change in the deadline for MERC's annual decoupling evaluation report from March 1 to May 1, as approved in Docket No. G-007,011/GR-10-977 by order dated September 26, 2014. Third, the winter construction charges, tariff sheet 9.06, did not accurately reflect the most current, approved winter construction charges (as approved in Docket No. G011/M-14-361). Finally, the New Area Surcharge tariff, sheet number 9.17, listed the incorrect surcharge for the Lake Ely Project (as approved in Docket No. G-011/M-14-524). The corrected tariff sheets 5.10, 7.19, 9.06, and 9.17 are included as Schedule 1 to this filing.

Additionally, MERC noticed an error in the calculation of the Northshore Mining tracker adjustment. Order point 7 of the Commission's October 28, 2014 Order required that MERC credit the CIP tracker for the CCRC and CCRA amounts that were not collected from MERC customer Northshore Mining company from July 2006 through December 2013, before Northshore's CIP exemption became effective on January 1, 2014. The Commission's Order further required that MERC add a one-time carrying charge at its approved, overall rate of return. The NorthShore tracker adjustment included in



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Schedule F to the January 21 compliance filing unintentionally omitted the calculation of CCRC that should have been collected for the period July-December 2006. Additionally, the adjustment amount was calculated based on an incorrect effective date for the 2010 revised CCCRA. Finally, the calculation of applicable carrying charges in the adjustment reflected in Schedule F did not accurately reflect the agreement between MERC and the Department of Commerce. These additional adjustments also result in further adjustment to the carrying charge calculation. Attached as Schedule 2 is a summary of these adjustments. MERC will make an additional adjustment to the 2015 tracker and will file the tracker showing that adjustment with its May 1, 2015 CIP filing.

Please contact me at (920) 433-2926 if you have any questions.

Sincerely,

A handwritten signature in black ink that reads "Seth DeMerritt".

Seth DeMerritt
Rate Case Consultant

Schedule 1

Clean and Redline Tariff Corrections

Redline Tariff Sheet Nos. 5.10, 9.06, 9.17

RATE SCHEDULE SVI-NNG SMALL VOLUME INTERRUPTIBLE SERVICE

1. Availability: Service under this rate schedule is available to towns and to related rural areas supplied through Northern Natural Gas in MERC's Minnesota Service Area.
2. Applicability and Character of Service: This rate schedule shall apply to small volume gas service which is subject to interruption at any time upon order of MERC. Daily consumption should not exceed 199 dekatherms on any day. Customer must have and maintain both the proven capability and adequate fuel supplies to use alternative fuel if MERC's service to such customer is interrupted. At MERC's request, the customer must demonstrate that it has such capability and fuel supplies. If customer or MERC thinks customer's maximum daily consumption is 200 dekatherms per day or more, usage will be monitored by the MERC to determine whether the customer qualifies for large volume service. Interruptible service is available to a Human Needs Customer only if the customer has signed an affidavit that it has and will maintain both the proven capability and adequate fuel supplies to use alternate fuel if MERC's service to such customer is interrupted. At MERC's request, the customer must demonstrate that it has such capability and fuel supplies. A firm customer may transfer to interruptible service for the period November 1 through October 31 after giving the Company ninety days advance notice prior to November 1. An interruptible customer may not return to firm service until the next November 1st and must notify the Company in writing at least ninety days prior to the transfer. A customer may only transfer to firm sales service if Company is able to arrange adequate additional firm gas entitlements to meet the needs imposed on its system by the customer, without jeopardizing system reliability or increasing costs for its other customers.
3. Customer has the option to obtain joint gas service consisting of a base of firm gas volume, supplemented by interruptible volumes not to exceed 199 dekatherms per day. A customer may transfer to joint gas service for the period November 1 through October 31 after giving the Company ninety days advance notice prior to November 1. A joint customer must maintain joint gas service and must nominate a DFC for the entire November through October period. A joint customer may not return to interruptible or firm service until the next November 1st and must notify the Company in writing at least ninety days prior to the transfer. A customer may only transfer to firm sales service if Company is able to arrange adequate additional firm gas entitlements to meet the needs imposed on its system by the customer, without jeopardizing system reliability or increasing costs for its other customers. If a customer wishes to obtain or maintain joint gas service, the customer or the customers' brokers must provide the Company with details as to the amount of firm capacity purchased to date in a calendar year on the interstate pipeline by August 1. If a customer or its broker provides this information, the Company will take this information into account when evaluating the upcoming heating season. This information will allow the Company to reconcile the amounts purchased for firm capacity from these joint customers on the interstate pipeline with the capabilities of the Company's distribution system for the upcoming heating season.
4. Rates:
 - A. Per month: Customer Charge ~~\$150~~165.00 per meter
Base rate of gas @ \$0.4~~340756357461~~ (MERC-NNG) per therm
Distribution charge @ \$0.~~10647-08490~~ per therm
 - B. The rate per therm of daily firm capacity, if any, shall be ~~\$1-95620-2.00712~~ per MDQ, as defined in the General Rules, Regulations, Terms and Conditions, per month. See Sheet No. 7.07 for rate details.

Issued By: DM Derricks

Asst. VP Regulatory Affairs

Submittal Date: February 13, 2015

*Effective with bills issued on and after this date.

*Effective Date: ~~July 1, 2013~~April 1, 2015Proposed Effective Date: ~~July 1, 2013~~April 1, 2015

REVENUE DECOUPLING MECHANISM ("RDM")(Continued)

7. Reports

No later than March 31 of the calendar year following the Commission's approval for the RDM, and then no later than March 1 of each succeeding year until the RDM terminates, the Company shall file annually with the Commission a report that specifies the RDM adjustments to be effective for each Rate Schedule Group for the Billing Period. The initial report shall reflect a Calendar Year that begins on the first day of the month succeeding the implementation of final rates approved by the Commission in Docket No. G007,011/GR-10-977 until December 31 of that year, and then for a full Calendar year for each succeeding year. The report shall include work papers and data supporting the calculations in Section 4 of the RDM. Adjustments shall be effective with bills rendered on or after March 1 of the Billing Period and shall continue for 12 months. The ~~Company report will also include an~~ shall also file an annual evaluation plan with information required by the Commission in Docket No. G007,011/GR-10-977 no later than May 1 each year.

In the event any portions of the proposed RDM adjustments are modified by the Commission, the adjustments shall be adjusted in accordance with the Commission's ~~O~~order.

The Company shall record in its best estimate of the amounts to be recognized under the RDM so as to reflect in its books and records a fair representation of the impact of the RDM in actual earnings. Such estimates shall be adjusted if necessary, upon filing RDM calculations with the Commission and again upon final Commission approval.

8. Pilot Period

RDM adjustments shall be determined for three Calendar Years and for any partial Calendar Year in which the RDM becomes effective. The Company may request approval from the Commission to extend the RDM beyond the pilot period.

Issued By: ~~DM Derricks~~ Jim Schott

Asst. VP Regulatory Affairs

Submittal Date: February 13, 2015

*Effective with bills issued on and after this date.

*Effective Date: ~~December 1, 2012~~ April 1, 2015

Proposed Effective Date: ~~December 1, 2012~~ April 1, 2015

EXTENSION OF NATURAL GAS SERVICE

2. EXTENSIONS OF COMPANY MAINS AND SERVICES (Continued)D. Winter Construction Charge

When the service or main is installed between December 1 and April 1, inclusive, because of failure of customer to meet all requirements of the Company by November ~~30~~ or because the customer's property, or the streets leading thereto, are not ready to receive the service pipe or gas main by such date, the anticipated winter construction charges will be included in determining the feasibility and any necessary contribution in aid of construction. Such work will be subject to a base winter construction charge on all ditch footages, as an adder, and applies to any plowing, trenching, boring, or bell holes.

In addition to the base winter construction charge, a frost charge will be assessed by the Company for those portions of main or service lines where twelve or more inches of frost exists. The frost charge is not included on boring lengths but can apply to open trench and send or receive holes for bores. When twelve inches or more of frost exists outside the Winter Construction period, the frost charge may be applied as an expense due to abnormal conditions pursuant to Sheet No. 9.04 or Sheet No. 9.05. Included within the base winter construction charge and the frost charge are the use of any thawing devices or other equipment required to install as needed.

The winter construction charge shall be equal to costs in excess of normal summer construction costs. Winter construction will not be undertaken by the Company where prohibited by law or where it is not practical to install gas main or gas service pipe during the winter season. The Company may reduce winter construction charges only to the extent the Company incurs a corresponding reduction in costs to install facilities during the winter construction period. The same charge reductions will be offered to all similarly situated customers. The Company may not assess customers more than the tariffed winter construction charge(s). Current winter construction charges are as follows:

- Winter Construction Charge: \$~~5.5028~~ (7 County Metro), \$~~4.9676~~ (out-state) per lineal foot;
- Frost Charge: \$~~6.055-81~~ (7 County Metro), \$~~5.7755~~ (out-state) per lineal foot.

Bell Holes: When it is necessary to use thawing devices in order to excavate the bell hole, or locate other utility crossings, there will be a ~~one-time~~per burner charge of \$~~297.9064-03~~ regardless of the number of thawing devices required.

E. Extension of Mains - Limitations

The Company reserves the right to refuse to install its facilities in or to any lot, tract or area if in the Company's judgment it is not economically feasible per the tariffed feasibility models, is not safe for the Company's personnel, the customer, or the general public, or the lot, tract, or area is located remotely from the Company's other general service areas such that effective service, operations, or emergency response capabilities are impacted.

EXTENSION OF NATURAL GAS SERVICE

3. NEW AREA SURCHARGE RIDER (Continued)

15) Revenue Excess or (Deficiency): Revenue excess or deficiency is the difference between the Total Revenue Requirement (Column 13) and the amount of Retail Revenue (Column 14). Excess occurs when the Total Revenue Requirement in a given year is less than the total Retail Revenue generated. Deficiency occurs when the Total Revenue Requirement in a given year is more than the total Retail Revenue generated.

16) Present Value of Cash Flows: The cash flows that produce either revenue excesses or deficiencies (Column 15) are discounted to a present value using a discount rate equal to the cost of long-term debt established in the most recent general rate proceeding.

If the sum of the present value calculations over the life of the project is zero, or as close to zero as possible, the model demonstrates that the project is “self supporting.” That is, the customer CIAC surcharge is the proper amount of customer contributed capital necessary to support the project at the projected (or actual) level of retail revenues.

Surcharge Rider Rates:

A surcharge as designated will be included in the monthly bills of the following Minnesota geographical areas:

Ely Lake Project	
Residential	\$ 334.5 <u>40</u>
Existing Small Commercial	\$ 334.5 <u>40</u>

Issued By: DM Derricks
Asst. Vice President, Regulatory Services
Submittal Date: ~~June 20, 2014~~February 13, 2015

*Effective with bills issued on and after this date.

*Effective Date: ~~September 5, 2014~~April 1, 2015
Proposed Effective Date: April 1, 2015~~September 5, 2014~~

Clean Tariff Sheet Nos. 5.10, 9.06, 9.17

RATE SCHEDULE SVI-NNG SMALL VOLUME INTERRUPTIBLE SERVICE

1. Availability: Service under this rate schedule is available to towns and to related rural areas supplied through Northern Natural Gas in MERC's Minnesota Service Area.
2. Applicability and Character of Service: This rate schedule shall apply to small volume gas service which is subject to interruption at any time upon order of MERC. Daily consumption should not exceed 199 dekatherms on any day. Customer must have and maintain both the proven capability and adequate fuel supplies to use alternative fuel if MERC's service to such customer is interrupted. At MERC's request, the customer must demonstrate that it has such capability and fuel supplies. If customer or MERC thinks customer's maximum daily consumption is 200 dekatherms per day or more, usage will be monitored by the MERC to determine whether the customer qualifies for large volume service. Interruptible service is available to a Human Needs Customer only if the customer has signed an affidavit that it has and will maintain both the proven capability and adequate fuel supplies to use alternate fuel if MERC's service to such customer is interrupted. At MERC's request, the customer must demonstrate that it has such capability and fuel supplies. A firm customer may transfer to interruptible service for the period November 1 through October 31 after giving the Company ninety days advance notice prior to November 1. An interruptible customer may not return to firm service until the next November 1st and must notify the Company in writing at least ninety days prior to the transfer. A customer may only transfer to firm sales service if Company is able to arrange adequate additional firm gas entitlements to meet the needs imposed on its system by the customer, without jeopardizing system reliability or increasing costs for its other customers.
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4. Rates:
 - A. Per month: Customer Charge \$165.00 per meter
Base rate of gas @ \$0.43407 (MERC-NNG) per therm
Distribution charge @ \$0.08490 per therm
 - B. The rate per therm of daily firm capacity, if any, shall be \$2.00712 per MDQ, as defined in the General Rules, Regulations, Terms and Conditions, per month. See Sheet No. 7.07 for rate details.

REVENUE DECOUPLING MECHANISM ("RDM")(Continued)

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Asst. VP Regulatory Affairs

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Proposed Effective Date: April 1, 2015

EXTENSION OF NATURAL GAS SERVICE

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The winter construction charge shall be equal to costs in excess of normal summer construction costs. Winter construction will not be undertaken by the Company where prohibited by law or where it is not practical to install gas main or gas service pipe during the winter season. The Company may reduce winter construction charges only to the extent the Company incurs a corresponding reduction in costs to install facilities during the winter construction period. The same charge reductions will be offered to all similarly situated customers. The Company may not assess customers more than the tariffed winter construction charge(s). Current winter construction charges are as follows:

- Winter Construction Charge: \$5.50 (7 County Metro), \$4.96 (out-state) per lineal foot;
- Frost Charge: \$6.05 (7 County Metro), \$5.77 (out-state) per lineal foot.

Bell Holes: When it is necessary to use thawing devices in order to excavate the bell hole, or locate other utility crossings, there will be a per burner charge of \$297.90 regardless of the number of thawing devices required.

E. Extension of Mains - Limitations

The Company reserves the right to refuse to install its facilities in or to any lot, tract or area if in the Company's judgment it is not economically feasible per the tariffed feasibility models, is not safe for the Company's personnel, the customer, or the general public, or the lot, tract, or area is located remotely from the Company's other general service areas such that effective service, operations, or emergency response capabilities are impacted.

EXTENSION OF NATURAL GAS SERVICE

3. NEW AREA SURCHARGE RIDER (Continued)

15) Revenue Excess or (Deficiency): Revenue excess or deficiency is the difference between the Total Revenue Requirement (Column 13) and the amount of Retail Revenue (Column 14). Excess occurs when the Total Revenue Requirement in a given year is less than the total Retail Revenue generated. Deficiency occurs when the Total Revenue Requirement in a given year is more than the total Retail Revenue generated.

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If the sum of the present value calculations over the life of the project is zero, or as close to zero as possible, the model demonstrates that the project is "self supporting." That is, the customer CIAC surcharge is the proper amount of customer contributed capital necessary to support the project at the projected (or actual) level of retail revenues.

Surcharge Rider Rates:

A surcharge as designated will be included in the monthly bills of the following Minnesota geographical areas:

Ely Lake Project	
Residential	\$33.50
Existing Small Commercial	\$33.50

Schedule 2

Northshore Mining CIP Adjustments

MERC

Tracker Adjustments Resulting from Corrections to North Shore Mining

Docket No. G011/GR-13-617

13-Feb-15

Schedule 2

Line	Tracker	Description	CCRC CCRA Amount	One-Time Carry Cost	Monthly Carry Cost Jun - Dec 2014
1	PNG	North Shore Mining adjustment reported in Compliance Filing	\$ 2,824,997.00	\$ 555,695.00	
2		Correction to include CCRC from Jul-Dec 2006	45,458.00	35,150.00	
3		Correction to exclude CCRA charges from Jan-Oct 2010	(367,668.00)	(120,926.00)	
4		Correction of carrying cost rate for 2006-2007 and calculation of one-time carrying costs on a monthly basis rather than on an annual basis	-	128,850.00	
5		Adjustment of monthly carry cost from June-Dec 2014 (1)	-	-	(14,705.71)
6		Final corrected North Shore Mining adjustment - PNG	2,502,787.00	598,769.00	(14,705.71)
7		Tracker adjustment recorded in 2015 (line 6-line 1)	<u>\$ (322,210.00)</u>	<u>\$ 43,074.00</u>	<u>\$ (14,705.71)</u>
8	CONS	North Shore Mining adjustment reported in Compliance Filing	\$ 341,515.00	\$ 13,366.00	
9		Correction of calculation of one-time carrying costs on a monthly basis rather than on an annual basis.	-	15,221.00	
10		Final corrected North Shore Mining adjustment - CONS	341,515.00	28,587.00	
11		Tracker adjustment recorded in 2015 (line 10-line 8)	<u>\$ -</u>	<u>\$ 15,221.00</u>	

(1) This adjustment is not directly related to the one-time North Shore adjustment. However, as a result of the change to the one-time North Shore adjustment, the calculation of the normal carrying costs for the months of June-December 2014 would require adjustment.

AFFIDAVIT OF SERVICE

STATE OF MINNESOTA)
) ss
COUNTY OF HENNEPIN)

Kristin M. Stastny hereby certifies that on the 13th day of February, 2015, on behalf of Minnesota Energy Resources Corporation, she electronically filed a true and correct copy of the attached Corrections to MERC's Compliance Filing on www.edockets.state.mn.us. Said documents were also served via U.S. mail and electronic service as designated on the attached service list.

/s/ Kristin M. Stastny
Kristin M. Stastny

Subscribed and sworn to before me
This 13th Day of February, 2015.

/s/ Alice Jaworski
Notary Public, State of Minnesota

[illegible]

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Eric	Lipman	eric.lipman@state.mn.us	Office of Administrative Hearings	PO Box 64620 St. Paul, MN 551640620	Electronic Service	Yes	OFF_SL_13-617_Official cc service list
Peter	Madsen	peter.madsen@ag.state.mn.us	Office of the Attorney General-DOC	Bremer Tower, Suite 1800 445 Minnesota Street St. Paul, Minnesota 55101	Electronic Service	No	OFF_SL_13-617_Official cc service list
Chad T	Marriott	ctmarriott@stoel.com	Stoel Rives LLP	900 SW 5th Ave Ste 2600 Portland, OR 97204	Electronic Service	No	OFF_SL_13-617_Official cc service list
Andrew	Moratzka	apmoratzka@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_13-617_Official cc service list
Barbara	Nick	banick@integrysgroup.com	Minnesota Energy Resources Corporation	2665 145th Street PO Box 455 Rosemount, MN 55068-0455	Electronic Service	No	OFF_SL_13-617_Official cc service list
Richard	Savelkoul	rsavelkoul@martinsquires.com	Martin & Squires, P.A.	332 Minnesota Street Ste W2750 St. Paul, MN 55101	Electronic Service	No	OFF_SL_13-617_Official cc service list
Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates	Ste 122 9100 W Bloomington Fwy Bloomington, MN 55431	Electronic Service	Yes	OFF_SL_13-617_Official cc service list
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Daniel P	Wolf	dan.wolf@state.mn.us	Public Utilities Commission	121 7th Place East Suite 350 St. Paul, MN 551012147	Electronic Service	Yes	OFF_SL_13-617_Official cc service list

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
James P.	Zakoura	Jim@smizak-law.com	Smithyman & Zakoura Chartered	750 Commerce Plaza II 7400 West 110th Street Overland Park, KS 662102362	Electronic Service	No	OFF_SL_13-617_Official cc service list