MINNESOTA DEPARTMENT OF COMMERCE

85 7TH PLACE EAST, SUITE 500
SAINT PAUL, MINNESOTA 55101-2198
MN.GOV/COMMERCE
651.539.1500 FAX: 651.539.1547
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July 1, 2015

Daniel P. Wolf
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, Minnesota 55101-2147

RE: **Comments of the Minnesota Department of Commerce, Division of Energy Resources**
Docket No. G007,G011/GR-10-977

Dear Mr. Wolf:

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

> Minnesota Energy Resource Corporation's (MERC, Company) Decoupling Evaluation Report for Calendar Year 2014 regarding the Company's Revenue Decoupling Program.

The decoupling evaluation report was filed on May 1, 2015 by:

> Michael J. Ahern
> Partner
> Dorsey & Whitney LLP
> 50 South Sixth Street, Suite 1500
> Minneapolis, MN 55402-1498

Based on its review of MERC's evaluation report, the Department recommends that the Minnesota Public Utilities Commission(Commission) **allow MERC to continue assessing its decoupling adjustment and approve the Company's annual decoupling adjustment**.

The Department is available to answer any questions that the Commission may have.

Sincerely,

/s/ CHRISTOPHER T. DAVIS
Rates Analyst

/s/ CHRISTOPHER J. SHAW
Rates Analyst

CTD/CJS/lt
Attachment

MINNESOTA DEPARTMENT OF COMMERCE

BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

COMMENTS OF THE
MINNESOTA DEPARTMENT OF COMMERCE,
DIVISION OF ENERGY SERVICES

DOCKET NO. G007,G011/GR-10-977

I. BACKGROUND

On July 13, 2012, the Minnesota Public Utilities Commission (the Commission) issued its *Findings of Fact, Conclusions and Order (Rate Case Order)* in Minnesota Energy Resource Corporation's (MERC) 2010 General Rate Case.

As part of this *Rate Case Order*, the Commission authorized MERC to conduct a full decoupling program on a pilot basis for three years (aka Revenue Decoupling Mechanism or RDM) under Minnesota Statute § 216B.2412, subd.1. Full decoupling means that MERC's actual sales are not adjusted to reflect sales under normal weather (or any other factor).

Page 14 of the *Rate Case Order* stated:

> The Commission recognizes that MERC may already have plans in effect to achieve a higher level of energy savings in its upcoming triennial CIP filing. However, to ensure that the implementation of decoupling does not hamper MERC's continued progress toward attaining the 1.5% savings goal, the Commission will condition approval of the revenue decoupling program on MERC making a demonstration of annual incremental progress towards achieving a 1.5% rate of annual energy savings.
>
> Accordingly, the Commission will require the Company to file annual reports to the Commission that specify the RDM adjustment to be applied to each rate class for the billing period and demonstrate annual progress toward achieving the 1.5% energy efficiency goal set forth in Minn. Stat.§ 216B.241.

In addition, Page 15 of the *Rate Case Order* stated:

> Approval of MERC's decoupling proposal will provide valuable data on whether an alternative form of rate decoupling – full decoupling – achieves continued and/or additional energy savings for the utility. No pilot program can guarantee a particular result in advance. The decoupling statute, however, does not require such a guarantee as a precondition for approving a pilot program.

Finally, paragraph 11 of the *Rate Case Order* stated, in part:

> 11. MERC's request for a full revenue decoupling pilot program in the form recommended by the Administrative Law Judge is approved with the following modifications or conditions.
>
> A. MERC shall file annual reports to the Commission that specify the Revenue Decoupling Mechanism (RDM) adjustment to be applied to each rate class for the billing period and demonstrate annual progress toward achieving the 1.5% energy efficiency goal set forth in Minn. Stat. § 216B.241.

On May 1, 2015, MERC submitted its *Compliance Filing Revenue Decoupling Evaluation Report for 2014* (*2014 Decoupling Evaluation* or *Report*).[1]

Below, the Department evaluates MERC's *2014 Decoupling Evaluation* in light of the Commission's *Rate Case Order.*

II. DEPARTMENT ANALYSIS

A. MERC'S PROGRESS TOWARDS ATTAINING 1.5 PERCENT ENERGY SAVINGS GOAL

Similar to its *2013 Decoupling Evaluation*, MERC provided both qualitative and quantitative information showing changes in the results of MERC's Conservation Improvement Program (CIP) in its *2014 Decoupling Evaluation*. Some of these are briefly highlighted below.

1. Addition of new projects, or new measures in an existing project

While no major changes were made to the CIP portfolio in 2014, MERC continued to implement its other projects such as the following projects added the summer of 2013:

- A residential heating system tune-up added to MERC's Residential Rebate project,

[1]MERC submitted its previous *Compliance Filing Revenue Decoupling Evaluation Report for 2013* (*2013 Decoupling Evaluation*) on March 27, 2014.

- A retro-commissioning measure added to MERC's C&I Custom Rebate project,
- A multifamily Direct Install Plus project (launched in July 2013), and
- A Small Business Direct Install Plus project (launched in August 2013).

In addition, MERC continued to implement its other projects, with the exception of its Home Energy Reports project.

2. Changes in CIP spending

Table B1 (B) in the 2014 Evaluation Report indicates that MERC's CIP spending declined from 2013 to 2014. However, MERC's 2014 CIP spending is higher than the Company's 2010 CIP spending and similar to its spending in 2011. Further, a significant portion of the reduction in MERC's spending is because some of MERC's largest customers opted out of CIP, beginning in 2013.

3. Changes in CIP energy savings

Table 1 below summarizes the information presented by MERC in Tables B1 (C) and (D) of its *Report*.

Table 1: Comparison of Energy Savings, with 2010-2012 Energy Savings to Reflect 3-Year Life of Residential Behavioral Savings Project[2]

	2010	2011	2012	Average 2010-2012	2013	2014	2014 as % of 2010-2012 Avg	2014 as % of 2013
Low-Income Projects	10,567	7,244	7,664	8,492	11,207	8,139	96%	73%
Residential Projects	179,590	203,571	185,948	189,703	208,071	180,137	95%	87%
C/I Projects	203,060	210,022	294,842	235,975	205,542	180,792	77%	88%
Total Savings	395,227	422,848	490,466	436,180	449,832	369,068	85%	82%

As can be seen in Table 1, MERC's 2014 total energy savings were only 82 percent of MERC's 2013 total energy savings. MERC's low-income and residential customer energy savings were similar to the 2010-2012 average, but C/I Project energy savings were only 77 percent of the 2010-2012, pre-decoupling average. However, the Department notes that when comparing the Company's 2014 C/I energy saving with MERC's C/I energy savings in previous years one has to take into account that in 2013 the Company had fewer C/I customers to market energy savings to due to opt outs. Another way to look at MERC's

[2] Table 1 includes reductions to MERC's historical residential projects to recognize that the energy savings from behavioral projects are now assumed to have a three-year life, instead of one year, and that a project that would have been assumed to save 300 MCF when the behavioral projects were first approved are now assumed to save 100 MCF. The Department is currently working with interested parties to re-examine the issue of how to count savings from behavioral projects.

progress in energy savings is to review the Company's energy savings as a percent of retail sales.

Minnesota Statutes 216B.241, Subd. 1c. (b) explains how energy savings as a percent of retail sales are to be calculated:

> (b) Each individual utility and association shall have an annual energy-savings goal equivalent to 1.5 percent of gross annual retail energy sales unless modified by the commissioner under paragraph (d). The savings goals must be calculated based on the most recent three-year weather-normalized average.

When making these calculations, utilities typically average weather-normalized retail sales to non-CIP-exempt customers for the three years preceding the filing of their triennial CIP plans to the Department. MERC filed CIP triennial plans in 2009 and 2012. Thus, MERC's 2010-2012 energy savings should be compared to the average of the Company's 2006-2008 weather normalized retail sales to non-CIP-exempt customers, and MERC's 2013-2015 energy savings should be compared to the average of the Company's 2009-2011 weather normalized sales to non-CIP-exempt customers. The exception is that in the event that a utility has a customer that opts out during a CIP triennial, it makes sense to subtract those sales when making this calculation.

Table 2 below shows MERC's energy savings as a percent of retail sales using the above methodology for calculating non-CIP-exempt retail sales.[3]

Table 2: MERC's Energy Saving Achievements as Percent of Retail Sales

	First Year Energy Savings (MCF)	Non-CIP-Exempt Retail Sales	Energy Savings as Percent of Retail Sales
2010	449,436	54,862,275	0.82%
2011	457,747	54,862,275	0.83%
2012	534,596	54,862,275	0.97%
2013	424,827	35,297,938	1.20%
2014	369,068	35,297,938	1.05%

The non-CIP-exempt-retail sales of 35,297,938 used to calculate the 2013-2014 percent of retail sales was filed by MERC in Docket No. G011/M-15-420. For the years 2010-2012 the Department used sales figures that it had stored in a database. The Department asks that in reply comments that MERC correct these sales numbers, explaining the source of the

[3] The Department notes that in the Company's Table B.2, MERC apparently used actual sales for each of the years that it calculated its percent of retail sales.

weather normalized retail sales used and any adjustments made due to customer CIP exemptions. The Department will provide additional analysis on MERC's energy savings after reviewing MERC's reply comments. Regardless, the Department will continue to monitor MERC's energy savings over time.

B. MERC'S REVENUE DECOUPLING SCENARIO ANALYSIS

The Department used the data provided in Attachment C of the *2014 Decoupling Evaluation* to analyze the different levels of revenues that the Company would have collected from each of its customer classes under full or partial decoupling as compared to traditional rate regulation. The analysis provided here covers five years, ranging from 2009-2014 and thus covers a variety of economic conditions and weather conditions, both of which impact sales. As the Commission evaluates various decoupling pilot projects, the Department will continue to aggregate information so that all parties can use it to make recommendations to the Commission. The Department notes that MERC's data covers 2014, which includes in part, the very cold 2013-2014 winter. The cold winter resulted in higher than forecasted sales and thus over-collection of the Company's fixed costs in resulting in the customer refunds calculated for 2014 activity in Table 4 below.

Attachment C of the *Report* provides a summary of how revenues that MERC would have collected under full and partial decoupling compare to revenues that would have been collected under traditional rate regulation. The analysis was for years 2009-2014. Table 3 below shows the differences in total revenue for the years 2009-2014. A positive number means ratepayers paid more than they would have under traditional regulation.

Table 3: MERC Decoupling Scenarios

		2009-2014
Residential		
	Full minus Traditional	$104,449
	Partial minus Traditional	($113,401)
Small C&I		
	Full minus Traditional	($147,999)
	Partial minus Traditional	($98,470)
Large C&I		
	Full minus Traditional	($3,662,456)
	Partial minus Traditional	($6,162,977)
Small Volume Interruptible & Joint		
	Full minus Traditional	($481,599)
Large Volume Interruptible & Joint		
	Full minus Traditional	$35,427
Small Volume Transport		
	Full minus Traditional	$132,755
Large Volume Transport		
	Full minus Traditional	$147,970
Super Large Volume Transport		
	Full minus Traditional	($437,825)

Table 1 indicates that for 2009-2014, MERC's residential customers paid somewhat higher revenues under full decoupling ($104,449) compared to traditional rate regulation and would have received refunds under partial decoupling ($113,401) compared to traditional rate regulation.[4] Attachment C of the *Report* shows a breakdown of the revenues by year. For the period 2009-2012, residential customers paid significantly higher revenues under full decoupling ($5.5 million) rather than traditional ratemaking, but would have been refunded money during 2013 and 2014, due to the very cold 2013-2014 winter. Under partial decoupling, residential customers would have paid higher revenues in years 2009-2013 and received a refund in 2014. Over the course of the 2009-2014 period, the impacts of the decoupling mechanism on rates is minimal.

1. *Small C&I*

Table 1 indicates that for 2009-2014, both partial and full decoupling would have had minimal impacts. A review of Attachment 1 indicates small C&I customers would have received refunds in 2009, 2013, and 2014, and paid surcharges for 2010-2012. (Note that partial decoupling is not shown for this and other interruptible and large classes since weather has a minimal impact on such classes.)

2. *Large C&I*

Table 1 indicates that MERC's large C&I customer class (not currently included under MERC's decoupling pilot program) would have received large refunds under full and partial decoupling. The refunds would have occurred every year, except for 2012 under full decoupling

3. *All other customer classes*

Table 1 indicates that for 2009-2013, full decoupling would have resulted in lower revenues paid by the Small Volume Interruptible and Super Large Volume Transport customer classes, while the other customer classes would have paid more in revenues.

[4] The following hypothetical example illustrates how a utility's total collection of money would change under traditional ratemaking, partial decoupling and full decoupling when sales are lower in the year following a rate case, and half of the decrease is due to unusually warm weather.

	Annual Revenue Collected	Traditional Ratemaking	Partial Decoupling	Full Decoupling
a	Rate Case	$1,000,000	$1,000,000	$1,000,000
b	Year 1 (Sales < RC)	$900,000	$900,000	$900,000
c	Year 2 (Sales = RC)	$1,000,000	$1,000,000	$1,000,000
d	Adjustment for Year 1	-	$50,000	$100,000
e	Total Recovery, Year 2	$1,000,000	$1,050,000	$1,100,000
	Total Recovery, Years 1 and 2 (b+e)	$1,900,000	$1,950,000	$2,000,000

C. REVENUE DEFERRAL ADJUSTMENT FOR EACH RATE CLASS

Table 4 below shows the monthly, annual, and cumulative revenue deferred by customer rate class in 2014.

Table 4: Monthly, Annual, and Cumulative Revenue Deferred by Customer Rate Class

	Residential			GS-Small C/I	
	Monthly	Cumulative		Monthly	Cumulative
14-Jan	$2,584,882	$2,584,882		$166,426	$166,426
14-Feb	$698,353	$3,283,235		$0	$166,426
14-Mar	$0	$3,283,235		$0	$166,426
14-Apr	$0	$3,283,235		$0	$166,426
14-May	$0	$3,283,235		$0	$166,426
14-Jun	$0	$3,283,235		$0	$166,426
14-Jul	$0	$3,283,235		$0	$166,426
14-Aug	$0	$3,283,235		$0	$166,426
14-Sep	($202,083)	$3,081,152		$0	$166,426
14-Oct	($227,932)	$2,853,220		$0	$166,426
14-Nov	$388,126	$3,241,346		$0	$166,426
14-Dec	$41,889	$3,283,235		$0	$166,426
Total-2014		$3,283,235			$166,426

Debits (positive numbers) reflect refunds to customers and credits (negative numbers) reflect customer surcharges.

Table 4 indicates that residential customers will be refunded approximately $3.2 million and GS-Small C/I customers will be refunded approximately $166,000, based on sales in 2014. (Positive numbers indicate a deferred refund, negative numbers indicate a deferred surcharge.) Note that the GS-Small C/I customer class encountered the cap of 10 percent of distribution revenues, which explains why there are so few recorded refunds or surcharges. The Department notes that CenterPoint Energy's newly approved full decoupling mechanism has no cap on refunds. The Commission may want to consider a similar feature for any future MERC decoupling mechanisms.

As further discussed below, the Department concludes that the Commission should allow MERC to continue to assess its decoupling adjustment and approve the Company's annual decoupling adjustment. Given that it appears that revenue decoupling would benefit MERC's rate classes not currently subject to revenue decoupling, the Department also concludes that in its next rate case MERC should consider extending decoupling to these other rate classes.

D. CALCULATION OF DEFERRALS

The Department reviewed MERC's calculation of its deferrals and concludes that the Company's calculations followed the method approved in MERC's rate case. However, as noted in the previous filing, the attachments included with MERC's decoupling report show negative sales figures in certain months. The issue of negative sales was raised in MERC's 2010 rate case (Docket No. G007,011/GR-10-977) and discussed through the course of the rate case analysis and also in the Company's subsequent billing system audit (which is also included in the 2010 rate case record). The reported negative sales are the result of the Company rebilling sales when they find a billing error and how these billing adjustments were previously handled in the Company's billing system (whether sales are adjusted in the month they are discovered or the month(s) that the errors occurred).

In its comments on MERC's 2013 decoupling adjustment, the Department noted that:

> [T]he unbilled sales issue under a pilot decoupling program can become a concern at the end of the review period. Since the decoupling pilot has not reached its conclusion, the unbilled sales concerns should not impact ratepayers or MERC at this time; as such, the Department does not believe that it is necessary for the Commission to hold up approval of the decoupling adjustment at this time. The Department will continue to work with MERC to reach an understanding on the most appropriate current sales number to estimate the RDM factor. In addition, the Department recommends that the Company provide additional discussion and evidence supporting its decision not to provide a revised attachment accounting for negative booked sales.

The Department notes that MERC did not provide any additional discussion or evidence supporting its decision to continue to record negative booked sales. Given the small volumes of unbilled sales, MERC's methodology is unlikely to impact the evaluation of its decoupling programs. However, the Company should provide additional discussion as previously requested on any impact of the unbilled sales.

E. PILOT STATUS

MERC requested that the Commission approve its decoupling mechanism as a permanent program after the completion of the pilot at the end of 2015. The pilot was initially intended to run through 2015, so that three full years of data could be evaluated. The Department will be better positioned next year, when 2015 data is available, to make a recommendation on the permanence of the program. Therefore, the Department recommends that the Commission allow the decoupling mechanism to continue until such time as the Commission has made a determination as to its permanence. However, the Department notes that, whether or not the Commission approves MERC's decoupling programs as permanent, the Department intends to continue to review the RDM's application and performance and to make recommendations regarding any needed improvement or changes. Thus, consistent with the Commission Order, the Department recommends that MERC file a decoupling evaluation for 2015 next year. Further, the Department recommends that MERC propose to extend revenue decoupling to all of its customer classes in its next rate case or explain why including these customers is not in the public interest.

F. RECOMMENDATIONS

The Department recommends that the Commission allow MERC to continue to assess its decoupling adjustment and approve the Company's annual decoupling adjustment.

In addition, the Department recommends that MERC provide additional discussion as previously requested on any impact of the unbilled sales in reply comments.

Also, the Department recommends the MERC be required to file a decoupling evaluation for 2015 next year, and extend the decoupling pilot until such time as the Commission makes a determination as to its permanence.

Also in reply comments, the Department requests that MERC provide any corrections needed for the non-CIP-exempt retail sales shown in Table 2.

Finally, the Department recommends that MERC propose to extend revenue decoupling to all of its customer classes in its next rate case or explain why including these customers is not in the public interest.

/lt

CERTIFICATE OF SERVICE

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

Minnesota Department of Commerce
Comments

Docket No. G007,011/GR-10-977

Dated this 1st day of July 2015

/s/Sharon Ferguson

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	OFF_SL_10-977_Official
Christopher	Anderson	canderson@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022191	Electronic Service	No	OFF_SL_10-977_Official
Julia	Anderson	Julia.Anderson@ag.state.mn.us	Office of the Attorney General-DOC	1800 BRM Tower 445 Minnesota St St. Paul, MN 551012134	Electronic Service	Yes	OFF_SL_10-977_Official
Michael	Auger	mauger@usenergyservices.com	U S Energy Services, Inc.	Suite 1200 605 Highway 169 N Minneaplis, MN 554416531	Electronic Service	No	OFF_SL_10-977_Official
James J.	Bertrand	james.bertrand@leonard.com	Leonard Street & Deinard	150 South Fifth Street, Suite 2300 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_10-977_Official
Michael	Bradley	mike.bradley@lawmoss.com	Moss & Barnett	150 S. 5th Street, #1200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_10-977_Official
Kathleen M.	Brennan	kmb@mcgrannshea.com	McGrann Shea Carnival, Straughn & Lamb, Chartered	N/A	Electronic Service	No	OFF_SL_10-977_Official
Seth	DeMerritt	ssdemerritt@integrysgroup.com	Integrys Business Support	700 North Adams P.O. Box 19001 Green Bay, WI 543079001	Electronic Service	No	OFF_SL_10-977_Official
Ian	Dobson	ian.dobson@ag.state.mn.us	Office of the Attorney General-RUD	Antitrust and Utilities Division 445 Minnesota Street, 1400 BRM Tower St. Paul, MN 55101	Electronic Service	No	OFF_SL_10-977_Official
Richard	Eichstadt	richard.eichstadt@poet.com	Poet Biorefining - Preston	701 Industrial Dr N PO Box 440 Preston, MN 55965	Electronic Service	No	OFF_SL_10-977_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 500 Saint Paul, MN 551012198	Electronic Service	No	OFF_SL_10-977_Official
David P.	Geschwind	dp.geschwind@smmpa.org	Southern Minnesota Municipal Power Agency	500 First Avenue SW Rochester, MN 55902	Electronic Service	No	OFF_SL_10-977_Official
Annete	Henkel	mui@mnutilityinvestors.org	Minnesota Utility Investors	413 Wacouta Street #230 St.Paul, MN 55101	Electronic Service	No	OFF_SL_10-977_Official
Eric	Johnson	Eric.Johnson@ever-greenenergy.com	Ever-Green Energy	1350 Landmark Towers 345 St. Peter Street St. Paul, MN 55102	Electronic Service	No	OFF_SL_10-977_Official
David G.	Kult	dgkult@minnesotaenergyresources.com	Minnesota Energy Resources Corporation	2665 145th St. NW Rosemount, MN 55068	Electronic Service	No	OFF_SL_10-977_Official
David	Kyto	djkyto@integrysgroup.com	Integrys Business Support	700 North Adams PO Box 19001 Green Bay, WI 543079001	Electronic Service	No	OFF_SL_10-977_Official
James D.	Larson	james.larson@avantenergy.com	Avant Energy Services	220 S 6th St Ste 1300 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_10-977_Official
Amber	Lee	ASLee@minnesotaenergyresources.com	Minnesota Energy Resources Corporation	2665 145th St W Rosemount, MN 55068	Electronic Service	No	OFF_SL_10-977_Official
John	Lindell	agorud.ecf@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012130	Electronic Service	Yes	OFF_SL_10-977_Official
Eric	Lipman	eric.lipman@state.mn.us	Office of Administrative Hearings	PO Box 64620 St. Paul, MN 551640620	Electronic Service	No	OFF_SL_10-977_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Michael	Loeffler	mike.loeffler@nngco.com	Northern Natural Gas Co.	CORP HQ, 714 1111 So. 103rd Street Omaha, NE 681241000	Electronic Service	No	OFF_SL_10-977_Official
Pam	Marshall	pam@energycents.org	Energy CENTS Coalition	823 7th St E St. Paul, MN 55106	Electronic Service	No	OFF_SL_10-977_Official
Thomas R.	Maus		Energy Associates, Inc.	254 Highway 33 North Cloquet, MN 557209403	Paper Service	No	OFF_SL_10-977_Official
Mike	McGlone	N/A	Heat Share - Salvation Army	2445 Prior Avenue Roseville, MN 55113	Paper Service	No	OFF_SL_10-977_Official
Brian	Meloy	brian.meloy@stinsonleonard.com	Stinson,Leonard, Street LLP	150 S 5th St Ste 2300 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_10-977_Official
Andrew	Moratzka	apmoratzka@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_10-977_Official
Jeff	Sande		Bemidji State University	Box 1 Deputy Hall 1500 Birchmont Drive Bemidji, MN 566012699	Paper Service	No	OFF_SL_10-977_Official
Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates	Ste 122 9100 W Bloomington Frwy Bloomington, MN 55431	Electronic Service	No	OFF_SL_10-977_Official
Steve	Sorenson	N/A	Constellation Energy	12120 Port Grace Blvd, Suite 200 La Vista, NE 68128	Paper Service	No	OFF_SL_10-977_Official
Byron E.	Starns	byron.starns@leonard.com	Leonard Street and Deinard	150 South 5th Street Suite 2300 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_10-977_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Kristin	Stastny	stastny.kristin@dorsey.com	Dorsey & Whitney LLP	50 South 6th Street Suite 1500 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_10-977_Official
Eric	Swanson	eswanson@winthrop.com	Winthrop Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_10-977_Official
Casey	Whelan		U.S. Energy Services, Inc.	Suite 1200 605 Highway 169 North Minneapolis, MN 554416531	Paper Service	No	OFF_SL_10-977_Official
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_10-977_Official