

October 12, 2015

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

RE: **Comments of the Minnesota Department of Commerce, Division of Energy Resources**
Docket Nos. G004/MR-15-871 and G004/MR-15-878

Dear Mr. Wolf:

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

Petitions by Great Plains Natural Gas Company (Great Plains), a Division of MDU Resources Group, Inc., to the Minnesota Public Utilities Commission (Commission) requesting approval of its interim base cost of gas (Docket No. G004/MR-878) and final base cost of gas (Docket No. G004/MR-15-871) to implement new base gas costs (Purchased Gas Adjustment zero-out) to coincide with the implementation of interim rates and final rates in its general rate case filing, Docket No. G004/GR-15-879.

The petitions were filed on September 30, 2015 by:

Tamie Aberle
Director of Regulatory Affairs
Great Plains Natural Gas Company
705 West Fir Avenue, P.O. Box 176
Fergus Falls, Minnesota 56538

Based on its review of the Company's *Petitions*, the Department recommends that the Commission:

- **withhold its decisions** on Great Plains' interim base cost of gas filing (Docket No. G004/MR-15-878), subject to Great Plains providing clarifying information, updated schedules, and revised tariff sheets as detailed in the body of these *Comments*.
- take no action, at this time, in the final base cost of gas filing (Docket No. G004/MR-15-871) as further described in the body of these *Comments*.

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

Sincerely,

/s/ ADAM J. HEINEN
Rates Analyst
(651) 539-1825

MJH/lt
Attachment

BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

COMMENTS OF THE
MINNESOTA DEPARTMENT OF COMMERCE
DIVISION OF ENERGY RESOURCES

DOCKET NOS. G004/MR-15-871 and G004/MR-15-878

I. SUMMARY OF GREAT PLAINS' PROPOSALS

Great Plains Natural Gas Company, a Division of MDU Resources Group (Great Plains or the Company), requests that the Minnesota Public Utilities Commission (Commission) approve a new base cost of gas to coincide with the Company's proposed January 1, 2016 implementation of interim rates requested in its general rate case Docket No. G004/GR-15-879. Great Plains also filed a final base cost of gas filing to coincide with the implementation of final rates in its general rate case. The Minnesota Department of Commerce, Division of Energy Resources (Department) provides its analysis of Great Plains' *Petition* below.

II. THE DEPARTMENT'S ANALYSIS

Minnesota Rules part 7825.2700, subpart 2, requires a utility to petition for a new base cost of gas, submitted as a miscellaneous rate change, to coincide with the implementation of interim rates during a general rate proceeding and also as part of the rate design compliance filing submitted as a result of a general rate proceeding. This Rule requires that "The base cost of gas must separately state the commodity base cost and the demand base cost components for each class." Through its review of Great Plains' interim *Petition*, the Department concludes that the Company has complied with these requirements through its Attachment B, Pages 1 and 2. The Department discusses Great Plains' demand and commodity costs separately below. First, the Department discusses the Company's final base cost of gas filing.

A. FINAL BASE COST OF GAS FILING

The Company made two base cost of gas filings on the same date, an interim petition to correspond with implementation of interim rates in the general rate case and a final petition to correspond with implementation of final rates at the end of the general rate case. After reviewing both base costs of gas filings, the Department concludes that the interim petition is ripe for analysis; however, the final petition was filed prematurely and need not be reviewed at this time.

Typically, a regulated gas company makes two base cost of gas filings during the course of a general rate case proceeding. The first filing (which Great Plains refers to as its interim petition) is filed concurrently with the filing of the initial general rate case petition. This initial filing resets the base cost of gas to correspond with the implementation of interim rates, which remain in place until implementation of final rates at the conclusion of the general rate case. The second filing is filed with the final compliance at the conclusion of the general rate case. These rates are then in place from the implementation of final rates until the beginning of interim rates at the start of the next general rate case.

Great Plains filed its final base cost of gas filing at the beginning of the general rate case proceeding rather than the end. While the early filing is not technically inappropriate, it is premature to analyze the petition because the final billing determinants, costs, and rate design assumptions proposed in the initial rate case filing are likely to change during the course of the rate case proceeding, which will require revisions to the cost of gas filing. For example, Great Plains' final cost of gas petition is based on Commission approval of the Company's proposed PGA consolidation. There is no guarantee that the Commission will approve this PGA consolidation and, if the proposal is not approved by the Commission, the Company would need to make significant changes to the final base cost of gas.

The Department recommends that the Commission take no action on Great Plains' final base cost of gas petition at this time and require the Company to file a final base cost of gas petition at the time of its final compliance in the general rate case petition.

B. DEMAND GAS COSTS

The Department reviewed Great Plains' filing for consistency with the calculations in the rate case and those in the interim base cost of gas filing. In its filing, the Company stated that the demand costs are based on the costs proposed in its most recent demand entitlement filing.¹ The Department confirms that the demand costs in the base cost of gas filing are consistent with the costs proposed in the demand entitlement filing.²

However, based on its review of the base cost of gas filing and the rate case schedules, the Department was unable to reconcile the demand costs in the base cost of gas filing with the

¹ Docket No. G004/M-15-645.

² The demand costs reported for the North District PGA are inclusive of costs related to Great Plains' North Dakota service territory.

schedules in the general rate case.³ Great Plains provided a breakdown of demand costs, by Purchased Gas Adjustment (PGA) district, in its base cost of gas filing; however, the Department notes that the revenue sheets in Statement E of the Company's general rate case filing do not appear to contain a breakdown of demand costs. In the rate case, Great Plains appears to have only provided costs on a total gas basis.

As such, the Department is unable to reconcile demand costs between the two filings. The Department recommends that Great Plains provide in its *Reply Comments* in this docket a breakdown of gas costs on both a demand and commodity basis, in addition to the total gas level currently provided in the general rate case filing. The Department also recommends the Great Plains provide an updated Statement E in its completeness reply comments in its general rate case reflecting separate demand and commodity costs in addition to total gas costs.

C. COMMODITY GAS COSTS

In its initial filing, the Company provided the per unit estimated costs of the weighted average cost of gas (WACOG) for its two PGAs, but Great Plains did not provide an explanation of how it estimated the WACOGs. In response to informal discovery, the Company provided an explanation and data supporting its projected WACOGs (Attachment 1). Based on the discovery response, Great Plains estimated its commodity costs, in part, based on the average of forecasted Henry Hub gas prices from three sources (*i.e.*, Wood Mackenzie, Energy Information Agency Short-term Energy Outlook, Bentek) accessed during late June and early July 2015. Great Plains then adjusted these forecasted Henry Hub prices by forecasted Demarcation Hub basis points⁴ to arrive at the estimated monthly commodity costs shown in Attachment C of the base cost of gas filing.

The Department compared these estimated commodity cost rates to current NYMEX (New York Mercantile Exchange) market expectations and, at this time, the rate estimates do not appear to be inappropriate. However, the Department notes that these estimates should be compared to actual gas costs when final rates are set, when the Commission may wish to consider whether any adjustments to gas costs and corresponding effects on other costs in the rate case should be reflected in final rates.

As noted in the demand cost section above, the Company did not provide a breakdown of gas costs by demand and commodity cost in its rate case schedules; as such, the Department is unable to verify whether commodity costs reconcile between the base cost of gas filing and the general rate case. Therefore, the Department recommends that Great Plains provide in its *Reply Comments* in this docket a breakdown of gas costs on both a demand and commodity basis, in addition to the total gas level currently provided in the general rate case filing. The Department also recommends that Great Plains provide an updated Statement E in its completeness reply comments in its general rate case reflecting separate demand and commodity costs in addition to total gas costs.

³ Demand costs, by both the North District and South District PGA, are provided in Attachment B of the base cost of gas filing. In the rate case, revenue components are provided in Statement E, Schedule E-1.

⁴ Forecasted basis points are taken from Wood Mackenzie.

D. TOTAL GAS COSTS

Great Plains provided total cost figures, for both PGA districts, in both the base cost of gas filing and the general rate case schedules. In the base cost of gas filing, the Company appears to report total North District gas costs of \$10,184,868.⁵ It appears that this total gas costs figure includes North Dakota jurisdictional sales; as such, when 275,000 Dekatherms (Dkt)⁶ of North Dakota sales are removed, the Department calculates total Minnesota North District gas costs of approximately \$7,572,985.⁷ In terms of the South District, which does not have North Dakota jurisdictional sales, the Company appears to report total gas costs of \$7,832,576 in the base cost of gas filing.⁸

As indicated above, Great Plains' gas costs figures in Attachment E of the rate case schedules, and the total gas costs in the rate case, do not reconcile with the gas costs reported in the base cost of gas filing. Specifically, Great Plains reported total gas costs in the rate case filing of \$7,665,380 for the North District and \$8,190,177 for the South District.⁹

The difference in reported total gas between the base cost of gas schedules and the general rate case schedules is significant and raises questions regarding the reasonableness of the proposed total revenue in the rate case; specifically, which set of figures is the "correct" revenue figure. The Department recommends that Great Plains reconcile its revenues between the base cost of gas filing and the general rate case petition and file, in its *Reply Comments*, updated schedules detailing this reconciliation of costs between the general rate case docket and in the base cost of gas docket.

E. JURISDICTIONAL SALES

Great Plains operates an integrated system with customers in both Minnesota and North Dakota. Currently, the Company's North District PGA provides natural gas service in both Minnesota and North Dakota. The Department reviewed the Company's base cost of gas filing and notes that Great Plains accounts appropriately for North Dakota sales;¹⁰ however, Great Plains does not separate North Dakota revenue from the North PGA District revenue reported in the base cost of gas filing. Since rate case revenues are presented on a Minnesota jurisdictional basis, the Department recommends that the Company provide in its *Reply Comments* in its base cost of gas filing, in addition to its total system revenue, updated schedules that show Minnesota jurisdictional revenue.

⁵ This figure is calculated based on demand costs of \$2,267,985 shown in Attachment B, Page 1 of 2, and total costs of \$7,916,883 shown in Attachment C, Page 1 of 5.

⁶ Attachment C, Page 3 of 5.

⁷ $(1,826,895 \text{ Dkt} * \$3.1328) + (1,215,700 \text{ Dkt} * \$1.5215) = \$7,572,985$. The sales figures are taken from Attachment C, Page 4 of 5.

⁸ This figure is calculated based on demand costs of \$1,833,249 shown in Attachment B, Page 2 of 2, and total costs of \$5,999,327 shown in Attachment C, Page 2 of 5.

⁹ Rate Case Filing, Statement E, Schedule E-1, Page 1 of 14.

¹⁰ Attachment C, Page 3 of 5.

F. *TARIFF SHEETS*

The update in the base cost of gas rates that coincides with implementation of interim rates involves a change in the rates charged to ratepayers. Changes in the base cost of gas rates requires updates to the tariffs for each of Great Plains' rate classes that are assessed these rates. The Department reviewed the Company's filing and notes that Great Plains did not provide redlined and clean tariff sheets. The Department recommends that Great Plains provide, in its *Reply Comments*, redlined and clean tariff sheets that reflect the appropriate updated base cost of gas rates.

III. THE DEPARTMENT'S RECOMMENDATIONS

Based on its review of the Company's *Petitions*, the Department recommends that the Commission withhold its decisions on Great Plains' interim base cost of gas filing (Docket No. G004/MR-15-878) subject to Great Plains providing clarifying information, updated schedules, and revised tariff sheets in its *Reply Comments*. Specifically, the Department recommends that Great Plains provide:

- a breakdown of gas costs on both a demand and commodity basis, in addition to the total gas level currently provided in the general rate case filing. Great Plains should also provide an updated Statement E in its completeness reply comments in its general rate case reflecting separate demand and commodity costs in addition to total gas costs;
- a full reconciliation of its revenues between the base cost of gas filing and the general rate case petition and file updated schedules detailing this reconciliation of costs between the general rate case docket and in the base cost of gas docket;
- updated schedules that show Minnesota jurisdictional revenue in addition to total system revenue; and
- redlined and clean tariff sheets that reflect the appropriate updated base cost of gas rates.

The Department also recommends that the Commission take no action, at this time, in the final base cost of gas filing (Docket No. G004/MR-15-871).

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**Great Plains Natural Gas Co.
Base Cost of Gas**

The Interim base cost of gas was developed by district using:

Billing Determinants

- Contracted capacity from the DEQ filing, Docket No. G004/M-15-645
- Firm sales volumes for projected 2016 from the rate case, Statement C, Schedule C-1 plus projected 2016 firm sales volumes for Great Plains North Dakota, shown on Attachment C, page 3.

Pipeline Rates

- Rates in effect as of August 2015, shown on Attachment C, page 5.

Gas Commodity Cost

- Projected dk purchases by month for 2016 by district
- Projected gas commodity prices as of August 2015 by month for 2016 using Demarc price for both districts as price differential is minimal (Page 3)
- Purchases multiplied by price by month calculated to arrive at annual weighted price per dk by district (Page 2)
- Storage is cycled annually, so in an annual period injections=withdrawals and it has no effect on the annual gas commodity costs.

The final base cost of gas was developed for total Great Plains using:

Billing Determinants

- Contracted capacity from the DEQ filing, Docket No. G004/M-15-645
- Firm sales volumes for projected 2016 from the rate case, Statement C, Schedule C-1 plus projected 2016 firm sales volumes for Great Plains North Dakota, shown on Attachment C, page 3.

Pipeline Rates

- Rates in effect as of August 2015, shown on Attachment C, page 5.

Gas Commodity Cost

- Projected dk purchases by month for 2016
- Projected gas commodity prices as of August 2015 by month for 2016 using Demarc price
- Purchases multiplied by price by month calculated to arrive at annual weighted price per dk
- Storage is cycled annually, so in an annual period injections=withdrawals and it has no effect on the annual gas commodity costs.

GREAT PLAINS NATURAL GAS CO.
GAS PURCHASES
PROJECTED 2015-2016

	2015			2016		
	North	South	Total	North	South	Total
<u>Purchases</u>						
January	374,165	285,737	659,902	330,000	251,900	581,900
February	383,339	372,914	756,253	295,600	261,600	557,200
March	275,272	212,726	487,998	242,300	235,100	477,400
April	160,400	166,825	327,225	195,600	115,000	310,600
May	108,250	119,900	228,150	106,400	59,600	166,000
June	79,550	114,600	194,150	77,600	91,000	168,600
July	82,550	118,700	201,250	71,000	92,600	163,600
August	65,000	77,000	142,000	95,200	76,300	171,500
September	112,100	104,100	216,200	110,600	118,500	229,100
October	210,300	139,300	349,600	214,700	137,600	352,300
November	247,600	268,600	516,200	250,800	270,400	521,200
December	342,300	326,700	669,000	342,600	333,300	675,900
Total	2,440,826	2,307,102	4,747,928	2,332,400	2,042,900	4,375,300

<u>Amount</u>						
January	\$1,331,319	\$976,216	\$2,307,535	\$1,010,823	\$771,595	\$1,782,418
February	1,344,465	1,355,646	2,700,111	915,000	809,757	1,724,757
March	918,752	703,977	1,622,729	734,896	713,058	1,447,954
April	404,789	421,669	826,458	560,785	329,705	890,490
May	277,351	320,050	597,401	302,985	169,717	472,702
June	213,725	317,531	531,256	220,035	258,031	478,066
July	223,741	319,495	543,236	205,076	267,466	472,542
August	173,849	205,944	379,793	281,173	225,352	506,525
September	304,587	282,850	587,437	328,537	352,004	680,541
October	572,247	379,049	951,296	663,101	424,978	1,088,079
November	718,609	779,558	1,498,167	791,073	852,896	1,643,969
December	1,032,479	985,425	2,017,904	1,107,968	1,077,892	2,185,860
Total	7,515,913	7,047,410	14,563,323	7,121,452	6,252,451	13,373,903

Per dk	\$3.0792	\$3.0547	\$3.0673	\$3.0533	\$3.0606	\$3.0567
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Price - actuals Jan-July

January	3.5581	3.4165	3.0631	3.0631
February	3.5072	3.6353	3.0954	3.0954
March	3.3376	3.3093	3.0330	3.0330
April	2.5236	2.5276	2.8670	2.8670
May	2.5621	2.6693	2.8476	2.8476
June	2.6867	2.7708	2.8355	2.8355
July	2.7104	2.6916	2.8884	2.8884
August	2.6746	2.6746	2.9535	2.9535
September	2.7171	2.7171	2.9705	2.9705
October	2.7211	2.7211	3.0885	3.0885
November	2.9023	2.9023	3.1542	3.1542
December	3.0163	3.0163	3.2340	3.2340

NYMEX Pricing

	6/1/2015	6/15/2015	7/1/2015	AVG.	Wood Mac Short/Long Term 6/25/15	EIA STEO 7/7/15	Bentek Long Term 6/23/15	Henry Hub Average	HHub diff to Mid-cont Wood Mac June 25	Est Demarc Price
Aug-15	\$ 2.677	\$ 2.912	\$ 2.783	\$ 2.791	\$ 2.850	\$ 3.200	\$ 2.700	\$ 2.885	\$ (0.211)	\$ 2.675
Sep-15	\$ 2.689	\$ 2.925	\$ 2.799	\$ 2.804	\$ 2.950	\$ 3.210	\$ 2.400	\$ 2.841	\$ (0.124)	\$ 2.717
Oct-15	\$ 2.728	\$ 2.954	\$ 2.831	\$ 2.838	\$ 3.000	\$ 3.190	\$ 2.350	\$ 2.844	\$ (0.123)	\$ 2.721
Nov-15	\$ 2.846	\$ 3.067	\$ 2.932	\$ 2.948	\$ 3.100	\$ 3.240	\$ 2.723	\$ 3.003	\$ (0.101)	\$ 2.902
Dec-15	\$ 3.028	\$ 3.242	\$ 3.104	\$ 3.125	\$ 3.150	\$ 3.370	\$ 2.942	\$ 3.147	\$ (0.130)	\$ 3.016
2015 Avg	\$ 2.794	\$ 3.020	\$ 2.890	\$ 2.901	\$ 3.010	\$ 3.242	\$ 2.623	\$ 3.051	\$ (0.14)	\$ 2.913
Jan-16	\$ 3.133	\$ 3.342	\$ 3.214	\$ 3.230	\$ 3.150	\$ 3.430	\$ 2.972	\$ 3.195	\$ (0.132)	\$ 3.063
Feb-16	\$ 3.129	\$ 3.335	\$ 3.213	\$ 3.226	\$ 3.050	\$ 3.430	\$ 2.852	\$ 3.235	\$ (0.140)	\$ 3.095
Mar-16	\$ 3.091	\$ 3.291	\$ 3.173	\$ 3.185	\$ 2.950	\$ 3.350	\$ 2.493	\$ 3.162	\$ (0.129)	\$ 3.033
Apr-16	\$ 2.956	\$ 3.110	\$ 3.032	\$ 3.038	\$ 2.800	\$ 3.180	\$ 2.364	\$ 3.004	\$ (0.137)	\$ 2.867
May-16	\$ 2.966	\$ 3.108	\$ 3.039	\$ 3.038	\$ 2.750	\$ 3.180	\$ 2.552	\$ 2.989	\$ (0.142)	\$ 2.848
Jun-16	\$ 3.000	\$ 3.134	\$ 3.073	\$ 3.069	\$ 2.700	\$ 3.180	\$ 2.676	\$ 2.983	\$ (0.147)	\$ 2.836
Jul-16	\$ 3.042	\$ 3.170	\$ 3.112	\$ 3.108	\$ 2.600	\$ 3.420	\$ 2.631	\$ 3.043	\$ (0.154)	\$ 2.888
Aug-16	\$ 3.055	\$ 3.177	\$ 3.128	\$ 3.120	\$ 2.750	\$ 3.460	\$ 2.601	\$ 3.110	\$ (0.156)	\$ 2.954
Sep-16	\$ 3.051	\$ 3.168	\$ 3.123	\$ 3.114	\$ 2.750	\$ 3.500	\$ 2.585	\$ 3.121	\$ (0.151)	\$ 2.970
Oct-16	\$ 3.080	\$ 3.196	\$ 3.153	\$ 3.143	\$ 3.000	\$ 3.550	\$ 2.735	\$ 3.231	\$ (0.142)	\$ 3.089
Nov-16	\$ 3.156	\$ 3.263	\$ 3.233	\$ 3.217	\$ 3.100	\$ 3.610	\$ 3.013	\$ 3.309	\$ (0.155)	\$ 3.154
Dec-16	\$ 3.320	\$ 3.415	\$ 3.394	\$ 3.376	\$ 3.150	\$ 3.660	\$ 3.287	\$ 3.395	\$ (0.161)	\$ 3.234
2016 Avg	\$ 3.082	\$ 3.226	\$ 3.157	\$ 3.155	\$ 2.896	\$ 3.413	\$ 2.730	\$ 3.154	\$ (0.15)	\$ 3.009
Jan-17	\$ 3.450	\$ 3.536	\$ 3.517	\$ 3.501	\$ 3.229 est	\$ 3.516 est	\$ 3.559	\$ 3.415	\$ (0.13)	\$ 3.283
Feb-17	\$ 3.443	\$ 3.524	\$ 3.510	\$ 3.492	\$ 3.126 est	\$ 3.516 est	\$ 3.518	\$ 3.378	\$ (0.14)	\$ 3.238
Mar-17	\$ 3.393	\$ 3.461	\$ 3.454	\$ 3.436	\$ 3.024 est	\$ 3.434 est	\$ 3.418	\$ 3.298	\$ (0.13)	\$ 3.169
Apr-17	\$ 3.164	\$ 3.211	\$ 3.219	\$ 3.198	\$ 2.870 est	\$ 3.260 est	\$ 3.019	\$ 3.109	\$ (0.14)	\$ 2.972
May-17	\$ 3.167	\$ 3.213	\$ 3.217	\$ 3.199	\$ 2.819 est	\$ 3.260 est	\$ 3.071	\$ 3.092	\$ (0.14)	\$ 2.951
Jun-17	\$ 3.202	\$ 3.250	\$ 3.253	\$ 3.235	\$ 2.768 est	\$ 3.260 est	\$ 3.215	\$ 3.087	\$ (0.15)	\$ 2.940
Jul-17	\$ 3.242	\$ 3.290	\$ 3.293	\$ 3.275	\$ 2.665 est	\$ 3.506 est	\$ 3.246	\$ 3.149	\$ (0.15)	\$ 2.994
Aug-17	\$ 3.253	\$ 3.301	\$ 3.304	\$ 3.286	\$ 2.819 est	\$ 3.547 est	\$ 3.129	\$ 3.217	\$ (0.18)	\$ 3.041
Sep-17	\$ 3.243	\$ 3.291	\$ 3.294	\$ 3.276	\$ 2.819 est	\$ 3.588 est	\$ 3.268	\$ 3.227	\$ (0.14)	\$ 3.092
Oct-17	\$ 3.265	\$ 3.313	\$ 3.316	\$ 3.298	\$ 3.075 est	\$ 3.639 est	\$ 3.338	\$ 3.337	\$ (0.14)	\$ 3.198
Nov-17	\$ 3.336	\$ 3.383	\$ 3.388	\$ 3.369	\$ 3.178 est	\$ 3.700 est	\$ 3.388	\$ 3.416	\$ (0.13)	\$ 3.287
Dec-17	\$ 3.502	\$ 3.543	\$ 3.550	\$ 3.532	\$ 3.229 est	\$ 3.752 est	\$ 3.629	\$ 3.504	\$ (0.14)	\$ 3.363
2017 Avg	\$ 3.305	\$ 3.360	\$ 3.360	\$ 3.341	\$ 2.968	\$ 3.498	\$ 3.316	\$ 3.269	\$ (0.14)	\$ 3.127

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. G004/MR-15-871 and G004/MR-15-878

Dated this 12th day of October 2015

/s/Sharon Ferguson

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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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_15-871_MR-15-871
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_15-871_MR-15-871
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_15-871_MR-15-871
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_15-871_MR-15-871

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Tamie A.	Aberle	tamie.aberle@mdu.com	Great Plains Natural Gas Co.	400 North Fourth Street Bismarck, ND 585014092	Electronic Service	No	OFF_SL_15-878_M-15-878
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_15-878_M-15-878
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_15-878_M-15-878
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_15-878_M-15-878
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_15-878_M-15-878