



505 Nicollet Mall  
PO Box 59038  
Minneapolis, MN 55459-0038

July 11, 2016

Mr. Daniel Wolf  
Executive Secretary  
Minnesota Public Utilities Commission  
121 Seventh Place East, Suite 350  
St. Paul, MN 55101-2147

**RE: CenterPoint Energy Reply Comments to Comments of the Minnesota Department of Commerce, Division of Energy Resources  
Docket No. G008/M-16-366**

Dear Mr. Wolf:

CenterPoint Energy (the Company) respectfully submits the following Reply Comments in response to the June 28, 2016 *Comments* of the Minnesota Department of Commerce, Division of Energy Resources (DER) regarding the Company's 2015 *Conservation Improvement Program Status Report, 2015 Demand Side Management Financial Incentive, Conservation Improvement Program Tracker Report, and 2015 Conservation Cost Recovery Adjustment Aggregated Compliance Filing (Petition)*.

The Company has reviewed the DER's *Comments* and supports DER Staff's recommendations that the Minnesota Public Utilities Commission (the Commission) approve the Company's proposed 2015 Demand Side Management (DSM) financial incentive in the amount of \$12,732,019 and approve CenterPoint Energy's 2015 Conservation Improvement Program (CIP) Tracker Account as summarized in Table 1 of DER Staff's *Comments*.

As discussed in more detail below, the Company does not support the DER Staff's recommendation pertaining to the Company's requested 2017 Conservation Cost Recovery Adjustment (CCRA) or the DER Staff's recommendation to deny the Company's request to adjust its 2015 CIP Tracker Account to reflect the interim short-term cost of debt that was in effect starting in October of 2015. The Company supports the bill message language provided in DER Staff's *Comments*; however, does not support the CCRA amount provided therein.

#### 2017 CCRA Request

As discussed on page 43 of the *Petition*, the Company received approval of a 2016 budget that includes an extraordinarily large custom rebate project. The project has a sizable impact on the Company's 2016 CIP energy savings goals and budget. Due to the high energy savings goal associated with this project, the Company also anticipates a one-time spike in the corresponding DSM financial incentive and thus in recoverable CIP expenses in the year that the associated financial incentive is booked – forecasted for 2017. As a result, an increase in the CCRA rate is needed to recover those expenses. Because the increase in CIP expenses is expected to be a one-time event, the Company proposed implementing a CCRA rate in 2017 that is forecasted to amortize recovery of the CIP Tracker Account over the course of two years. Amortizing recovery over two years would avoid a sharp spike in rates for one year (2017), followed by a sharp decrease the following year, which would occur if the CIP Tracker Account were

recovered fully in 2017. The Company prefers the two-year amortization approach over recovering the full CIP Tracker balance in one year because it avoids dramatic fluctuations in the conservation recovery rate from year to year. Such fluctuations can result in higher customer dissatisfaction and increased customer confusion.

DER Staff recommended in the June 28<sup>th</sup> *Comments* that the Commission not accept the Company's requested CCRA rate. DER Staff recommend that the Commission approve a CCRA rate that will fully recover the Company's CIP Tracker balance in 2017, citing the goals of "recovering charges as close to the incurred date as possible" to ensure that current ratepayers bear current costs and "minimizing customer carrying costs."<sup>1</sup>

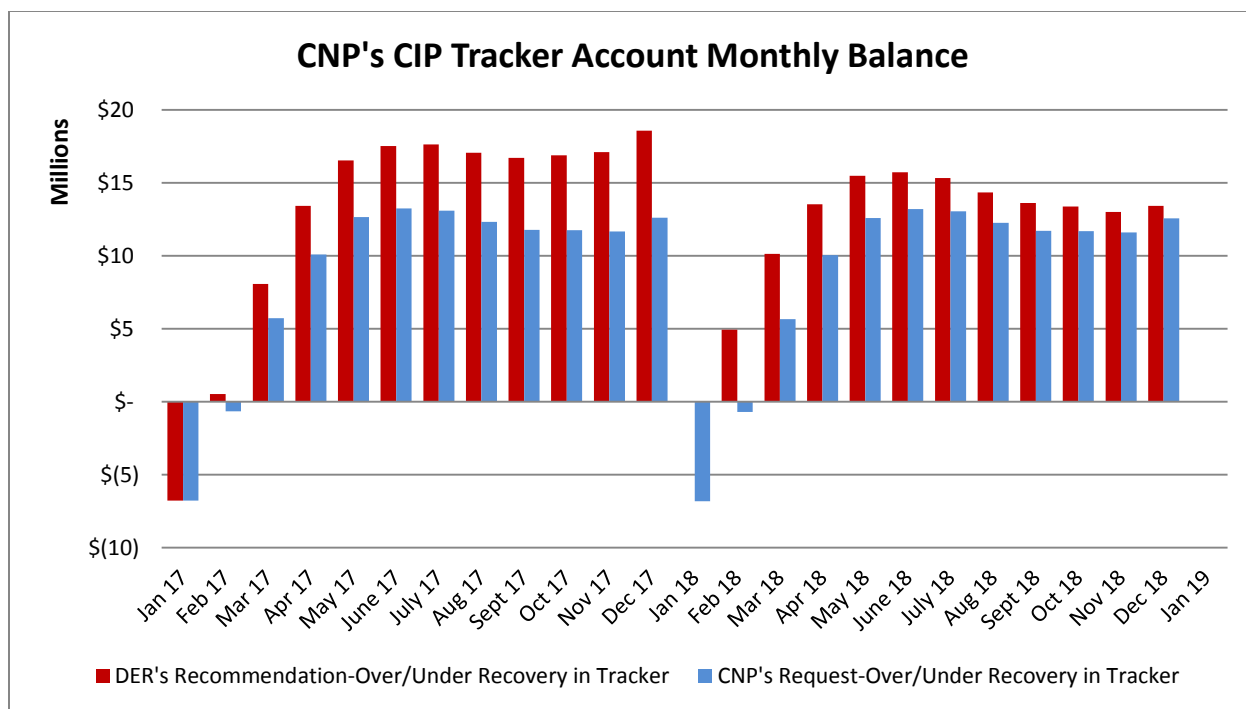
First, the Company believes that recovering the CIP Tracker Account balance fully over two years will result in minimal risk of new customers bearing a significant portion of CIP expenses incurred in the previous year. The Company typically adds approximately one percent in new customers annually. Therefore, fully recovering the CIP Tracker balance in 2017 might relieve a small number of new customers in 2018 from paying toward the previous year's CIP expenses, but would result in an avoidable one-time spike in rates for the vast majority of the Company's customers in 2017. Further, the oscillating nature of the DER's recommendation could result in significant customer dissatisfaction and potential confusion as rates would increase in 2017, only to drop again in 2018.

In general, the Company agrees with the DER's stated goal of "recovering charges as close to the incurred date as possible."<sup>2</sup> However, compared to the Company's proposal to recover costs over two years, the DER's recommended approach would not recover charges closer to when they were incurred. Instead, the DER's recommended approach results in early recovery of expenses in order to off-set the spike in CIP expenses that is forecasted to occur in the fourth quarter of 2017. Due to the cyclical nature of CIP expenses, which typically peak in the last few months of the calendar year, it is common for the Company's CIP Tracker Account to over-recover in the first part of the year in order to off-set fourth quarter expenses. However, the DER's recommended 2017 CCRA results in far higher over-recovery of conservation costs for the majority of 2017 than the Company's requested approach. As shown in the graph below, the DER's recommended 2017 CCRA (forecasted in red) over-recovers CIP expenses through November to a greater degree than the Company's requested 2017 CCRA (forecasted in blue). In other words, the DER's recommended CCRA would have the Company collect conservation costs earlier and hold on to larger amounts of ratepayer dollars than the Company's requested approach.

---

<sup>1</sup> June 28, 2016 Comments in Docket No. G008/M-16-366, page 9

<sup>2</sup> June 28, 2016 Comments in Docket No. G008/M-16-366, page 9



\*For clarity, the graph above shows an over-recovery of the CIP Tracker Account as a positive dollar amount. In the previously filed *Petition*, an over-recovered CIP Tracker Account balance was shown as a negative dollar amount.

Finally, the Company challenges the DER's assertion that their recommended CCRA rate would minimize carrying charges. It is important to remember that carrying charges in the CIP Tracker Account are calculated monthly and not solely on the year-end balance. Carrying costs can be both due from and payable to customers – carrying charges are due from customers when the Company has not fully recovered the CIP costs and carrying charges are payable to customers when the company has recovered from customers before the CIP costs are incurred. Because the Company's requested CCRA rate recovers costs more closely to the date that costs are incurred, it results in carrying charges that are less in absolute value than DER Staff's recommendation. The DER's recommendation results in a projected total of -\$237,828 in carrying charges over the two years (2017 and 2018), while the Company's requested CCRA rate results in a projected total of -\$173,653 over the same two-year period.

Therefore, the Company respectfully requests that the Commission approve its initial 2017 CCRA request of \$0.01553 per therm, which reflects a two-year amortization approach of recovering the CIP Tracker balance. This CCRA amount will maintain more consistent and stable conservation recovery rates over the next two years; it will result in timely recovery of conservation costs; and it will result in lower carrying charges than would a one-year recovery.

#### Carrying Charges Applied to the CIP Tracker Account

Due to the specific language of the Commission's December 17, 2014 *Order*, the Company did not update the short-term cost of debt rate to calculate carrying charges on the CIP Tracker Account at the time interim rates were implemented.<sup>3</sup> Instead, the Company used the approved short-term cost of

<sup>3</sup> Docket No. G008/GR-15-424

debt from the 2013 rate case<sup>4</sup> to calculate carrying charges. To avoid future misalignment between the CIP Tracker Account and effective rates for a given period, the Company requested in its April 29, 2016 *Petition* that the Commission allow the Company to update the short-term cost of debt in the CIP Tracker Account upon future changes in rates to be consistent with the Company's effective short-term cost of debt for the given period. The Company also requested that the Commission allow the Company to book an adjustment to the CIP Tracker Account in 2016 that would "true-up" the CIP Tracker Account to what it would have been if the Company had implemented the interim short-term cost of debt at the effective date of interim rates.

Commission approval of these requests would allow the Company to "true-up" the CIP Tracker Account for the interim short-term cost of debt as well as update the short-term cost of debt at the effective date of final rates in its 2015 rate case<sup>5</sup> and book the associated adjustment to address the difference between the interim short-term cost of debt rate and the final short-term cost of debt rate during the test year period. Given the timing of the rate case proceeding, the Company could make one adjustment, instead of the two adjustments discussed above (one to account for the interim short-term cost of debt during the test year and another to account for what carrying charges should have been at the final short-term cost of debt in the test year). This single adjustment could happen at the time of final rates and would account for the final, approved short-term cost of debt starting at the beginning of the test year period. The single adjustment would result in the same outcome in the CIP Tracker Account as the double adjustment option. Either way, the CIP Tracker Account would be adjusted by an amount that would make carrying charges equal to the amount they would be had the final short-term cost of debt been in place starting in October of 2015 (the beginning of the test year).

In the June 28, 2016 *Comments* by the DER, Staff recommend that the Commission deny the Company's request. Instead, DER Staff recommend that the Commission order the Company to update the short-term cost of debt on June of 2016 to the short-term cost of debt rate that was recently approved in the Company's 2015 rate case. This action would not use the appropriate short-term cost of debt during the test year period and would not allow the Company to keep the short-term cost of debt up-to-date with future rate changes.

The Company believes that the CIP Tracker Account should reflect currently effective rates for any given time period in order to appropriately calculate recovery of the Company's CIP expenses. The Company's proposal to make an adjustment to the CIP Tracker Account to account for final rates in the test year is consistent with longstanding practice, as explained in the Commission's Order in the Company's 1992 rate case:

The statutory interim rate scheme means that there is no Commission determination of actual utility revenue requirement at the time of setting interim rates. The formula is meant to stand as a temporary proxy for eventual Commission scrutiny, and to protect utilities from financial harm in the meantime.

At the time of the Commission's final rate case decision, the utility's revenue requirement is determined. This is the level that is applied in the rate case, and the interim rate formula is superseded.

---

<sup>4</sup> Docket No. G008/GR-13-316

<sup>5</sup> Docket No. G008/GR-15-424

The Minnesota rate case statute thus clearly contemplates a final determination of revenue requirement and rates which *is applied retroactively to the point at which rates had first been adjusted* [emphasis added] on an interim basis.<sup>6</sup>

Once final rates are approved and implemented, the Company recalculates revenue recovery and carrying charges during the test year using the final, approved rates. An adjustment is made to the CIP Tracker Account to account for the difference between interim and final rates – in this way the tracker reflects final rates at the start of the test year. As a part of the general rate case process, the Company provides a compliance filing that includes calculations of the difference between revenues collected during the time interim rates were in place and revenues that would have been collected under final approved rates, as well as the accounting entry that will be applied to the CIP Tracker Account to address that difference.<sup>7</sup>

The Company believes that the CIP Tracker Account should not deviate from the rates and timing set forth in a general rate case. A general rate case procedure is where the Commission thoroughly reviews and establishes rates. Therefore, the Company requested that the Commission approve its April 29, 2016 request to adjust the CIP Tracker Account to reflect interim short-term cost of debt for the interim rate period starting in October of 2015 and allow the Company to update its short-term cost of debt in the CIP Tracker Account upon future changes in rates. However, given timing considerations, the Company now proposes to forego the initial adjustment (to reflect the interim short-term cost of debt) and instead calculate the “true-up” adjustment based on the final, approved short-term cost of debt at the start of the test year. This adjustment would occur at implementation of final rates; the short-term cost of debt rate would then also be updated in the CIP Tracker Account at that time to reflect the final short-term cost of debt approved in the Company’s 2015 rate case. This method would reduce the number of adjustments to the CIP Tracker Account, while arriving at the same outcome as the methodology requested previously in the Company’s April 29, 2016 *Petition*.

#### CenterPoint Energy Requests

In summary, the Company requests that the Commission:

1. approve the Company’s requested 2015 DSM financial incentive of \$12,732,019;
2. approve the Company’s 2015 CIP Tracker Account as summarized on page 40 of the Company’s April 29, 2016 aggregated filing;
3. approve the Company’s requested CCRA rate of \$0.01553 per therm, effective on January 1, 2017;
4. allow the Company to apply an adjustment to its 2016 CIP Tracker Account to account for the final short-term cost of debt rate from its 2015 rate case, starting in October of 2015;
5. allow the Company to calculate carrying charges on the CIP Tracker Account balance using the Company’s effective short-term cost of debt for the applicable period; and
6. approve the Company’s requested bill message as stated on page 45 of the Company’s April 29, 2016 aggregated filing.

---

<sup>6</sup> December 29, 1993 *Order Rejecting Accounting Treatment in Compliance Filings* in Docket No. G008/GR-92-400 starting at page 8.

<sup>7</sup> See the December 10, 2014 CIP Tracker Compliance Filing made in Docket G008/GR-13-316.

The Company appreciates the opportunity to offer these Reply Comments. Please contact me at 612-321-4318 or [audrey.partridge@centerpointenergy.com](mailto:audrey.partridge@centerpointenergy.com) with any questions.

Sincerely,

/s/ Audrey C. Partridge

Audrey C. Partridge  
Senior Regulatory Analyst, Conservation Improvement Program  
C: Service List

**AFFIDAVIT OF SERVICE**

STATE OF MINNESOTA )  
 )  
COUNTY OF HENNEPIN )

Audrey C. Partridge, being first duly sworn on oath, deposes and says that she is an employee in the office of CenterPoint Energy, Minneapolis, Minnesota 55402, and that on the 11<sup>th</sup> day of July 2016, she delivered the enclosed notice of filing to those individuals and agencies listed on the attached pages, by:

  x   placing such notice in envelopes, properly addressed with postage paid, and depositing the same in the United States Mail at Minneapolis, Minnesota, for delivery by the United States Post Office,

       personal service,

       express mail,

       delivery service,

  x   electronic filing.

      /s/ Audrey C. Partridge        
Audrey C. Partridge

Subscribed and sworn to before me  
this 11<sup>th</sup> day of July 2016.

      /s/ Mary Jo Schuh        
Mary Jo Schuh  
Notary Public (Commission Expires January 31, 2020)

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_16-366_M-16-366
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_16-366_M-16-366
Tom	Balster	tombalster@alliantenergy.com	Interstate Power & Light Company	PO Box 351 200 1st St SE Cedar Rapids, IA 524060351	Electronic Service	No	OFF_SL_16-366_M-16-366
Lisa	Beckner	lbeckner@mnpower.com	Minnesota Power	30 W Superior St  Duluth, MN 55802	Electronic Service	No	OFF_SL_16-366_M-16-366
Mathias	Bell	mathias.bell@opower.com	Opower	1515 N Courthouse Rd  Arlington, VA 22201	Electronic Service	No	OFF_SL_16-366_M-16-366
William	Black	bblack@mmua.org	MMUA	Suite 400 3025 Harbor Lane North Plymouth, MN 554475142	Electronic Service	No	OFF_SL_16-366_M-16-366
William A.	Blazar	bblazar@mnychamber.com	Minnesota Chamber Of Commerce	Suite 1500 400 Robert Street North St. Paul, MN 55101	Electronic Service	No	OFF_SL_16-366_M-16-366
Christina	Brusven	cbrusven@fredlaw.com	Fredrikson Byron	200 S 6th St Ste 4000  Minneapolis, MN 554021425	Electronic Service	No	OFF_SL_16-366_M-16-366
Michael J.	Bull	mbull@mncee.org	Center for Energy and Environment	212 Third Ave N Ste 560  Minneapolis, MN 55401	Electronic Service	No	OFF_SL_16-366_M-16-366
Ray	Choquette	rchoquette@agp.com	Ag Processing Inc.	12700 West Dodge Road PO Box 2047 Omaha, NE 68103-2047	Electronic Service	No	OFF_SL_16-366_M-16-366
Gary	Connett	gconnett@grenergy.com	Great River Energy	12300 Elm Creek Blvd N  Maple Grove, MN 553694718	Electronic Service	No	OFF_SL_16-366_M-16-366



First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
George	Crocker	gwillc@nawo.org	North American Water Office	PO Box 174  Lake Elmo, MN 55042	Electronic Service	No	OFF_SL_16-366_M-16-366
Jill	Curran	jcurran@mnychamber.com	Minnesota Waste Wise	400 Robert Street North Suite 1500 St. Paul, Minnesota 55101	Electronic Service	No	OFF_SL_16-366_M-16-366
Leigh	Currie	lcurrie@mncenter.org	Minnesota Center for Environmental Advocacy	26 E. Exchange St., Suite 206  St. Paul, Minnesota 55101	Electronic Service	No	OFF_SL_16-366_M-16-366
Stacy	Dahl	sdahl@minnkota.com	Minnkota Power Cooperative, Inc.	1822 Mill Road PO Box 13200 Grand Forks, ND 58208-3200	Electronic Service	No	OFF_SL_16-366_M-16-366
Jeffrey A.	Daugherty	jeffrey.daugherty@centerpointenergy.com	CenterPoint Energy	800 LaSalle Ave  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_16-366_M-16-366
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_16-366_M-16-366
Steve	Downer	sdowner@mmua.org	MMUA	3025 Harbor Ln N Ste 400  Plymouth, MN 554475142	Electronic Service	No	OFF_SL_16-366_M-16-366
Charles	Drayton	charles.drayton@enbridge.com	Enbridge Energy Company, Inc.	7701 France Ave S Ste 600  Edina, MN 55435	Electronic Service	No	OFF_SL_16-366_M-16-366
Chris	Duffrin	chrisd@thenec.org	Neighborhood Energy Connection	624 Selby Avenue  St. Paul, MN 55104	Electronic Service	No	OFF_SL_16-366_M-16-366

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Jim	Erchul	jerchul@dbnhs.org	Daytons Bluff Neighborhood Housing Sv.	823 E 7th St  St. Paul, MN 55106	Electronic Service	No	OFF_SL_16-366_M-16-366
Greg	Ernst	gaernst@q.com	G. A. Ernst & Associates, Inc.	2377 Union Lake Trl  Northfield, MN 55057	Electronic Service	No	OFF_SL_16-366_M-16-366
Emma	Fazio	emma.fazio@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_16-366_M-16-366
Melissa S	Feine	melissa.feine@semcac.org	SEMCAC	PO Box 549 204 S Elm St Rushford, MN 55971	Electronic Service	No	OFF_SL_16-366_M-16-366
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_16-366_M-16-366
Edward	Garvey	garveyed@aol.com	Residence	32 Lawton St  Saint Paul, MN 55102	Electronic Service	No	OFF_SL_16-366_M-16-366
Angela E.	Gordon	angela.e.gordon@lmco.com	Lockheed Martin	1000 Clark Ave.  St. Louis, MO 63102	Electronic Service	No	OFF_SL_16-366_M-16-366
Pat	Green	N/A	N Energy Dev	City Hall 401 E 21st St Hibbing, MN 55746	Paper Service	No	OFF_SL_16-366_M-16-366
Jason	Grenier	jgrenier@otpc.com	Otter Tail Power Company	215 South Cascade Street  Fergus Falls, MN 56537	Electronic Service	No	OFF_SL_16-366_M-16-366
Stephan	Gunn	sgunn@appliedenergygroup.com	Applied Energy Group	1941 Pike Ln  De Pere, WI 54115	Electronic Service	No	OFF_SL_16-366_M-16-366

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Jeffrey	Haase	jhaase@greenergy.com	Great River Energy	12300 Elm Creek Blvd  Maple Grove, MN 55369	Electronic Service	No	OFF_SL_16-366_M-16-366
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	OFF_SL_16-366_M-16-366
Patty	Hanson	phanson@rpu.org	Rochester Public Utilities	4000 E River Rd NE  Rochester, MN 55906	Electronic Service	No	OFF_SL_16-366_M-16-366
Norm	Harold	N/A	NKS Consulting	5591 E 180th St  Prior Lake, MN 55372	Paper Service	No	OFF_SL_16-366_M-16-366
Jared	Hendricks	hendricksj@owatonnautiliti es.com	Owatonna Public Utilities	PO Box 800 208 S Walnut Ave Owatonna, MN 55060-2940	Electronic Service	No	OFF_SL_16-366_M-16-366
Randy	Hoffman	rhoffman@eastriver.coop	East River Electric Power Coop	121 SE 1st St PO Box 227 Madison, SD 57042	Electronic Service	No	OFF_SL_16-366_M-16-366
Karolanne	Hoffman	kmh@dairynet.com	Dairyland Power Cooperative	PO Box 817  La Crosse, WI 54602-0817	Electronic Service	No	OFF_SL_16-366_M-16-366
Tom	Holt	tholt@eastriver.coop	East River Electric Power Coop., Inc.	PO Box 227  Madison, SD 57042	Electronic Service	No	OFF_SL_16-366_M-16-366
Jim	Horan	Jim@MREA.org	Minnesota Rural Electric Association	11640 73rd Ave N  Maple Grove, MN 55369	Electronic Service	No	OFF_SL_16-366_M-16-366
Anne	Hunt	anne.hunt@ci.stpaul.mn.us	City of St. Paul	390 City Hall 15 West Kellogg Boulevard  Saint Paul, MN 55102	Electronic Service	No	OFF_SL_16-366_M-16-366

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Dave	Johnson	dave.johnson@aeoa.org	Arrowhead Economic Opportunity Agency	702 3rd Ave S Virginia, MN 55792	Electronic Service	No	OFF_SL_16-366_M-16-366
Joel W.	Kanvik	joel.kanvik@enbridge.com	Enbridge Energy LLC	4628 Mike Colalillo Dr Duluth, MN 55807	Electronic Service	No	OFF_SL_16-366_M-16-366
Deborah	Knoll	dknoll@mnpower.com	Minnesota Power	30 W Superior St Duluth, MN 55802	Electronic Service	No	OFF_SL_16-366_M-16-366
Tina	Koecher	tkoecher@mnpower.com	Minnesota Power	30 W Superior St Duluth, MN 558022093	Electronic Service	No	OFF_SL_16-366_M-16-366
Kelly	Lady	kellyl@austinutilities.com	Austin Utilities	400 4th St NE Austin, MN 55912	Electronic Service	No	OFF_SL_16-366_M-16-366
Joel	Larson	jl Larson@minnkota.com	Minnkota Power Cooperative, Inc.	1822 Mill Road Grand Forks, ND 58203	Electronic Service	No	OFF_SL_16-366_M-16-366
James	Lehnhoff	jlehnhoff@aeonmn.org	Aeon	901 N 3rd St Ste 150 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_16-366_M-16-366
Martin	Lepak	Martin.Lepak@aeoa.org	Arrowhead Economic Opportunity	702 S 3rd Ave Virginia, MN 55792	Electronic Service	No	OFF_SL_16-366_M-16-366
Alison	Lindburg	lindburg@fresh-energy.org	Fresh Energy	408 St. Peter St Ste 220 St. Paul, MN 55102	Electronic Service	No	OFF_SL_16-366_M-16-366
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_16-366_M-16-366

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Nick	Mark	nick.mark@centerpointenergy.com	CenterPoint Energy	800 LaSalle Ave  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_16-366_M-16-366
Pam	Marshall	pam@energycents.org	Energy CENTS Coalition	823 7th St E  St. Paul, MN 55106	Electronic Service	No	OFF_SL_16-366_M-16-366
Samuel	Mason	smason@beltramelectric.com	Beltrami Electric Cooperative, Inc.	4111 Technology Dr. NW PO Box 488 Bemidji, MN 56619-0488	Electronic Service	No	OFF_SL_16-366_M-16-366
Scot	McClure	scotmcclure@alliantenergy.com	Interstate Power And Light Company	4902 N Biltmore Ln PO Box 77007 Madison, WI 537071007	Electronic Service	No	OFF_SL_16-366_M-16-366
John	McWilliams	jmm@dairynet.com	Dairyland Power Cooperative	3200 East Ave SPO Box 817  La Crosse, WI 54601-7227	Electronic Service	No	OFF_SL_16-366_M-16-366
Brian	Meloy	brian.meloy@stinson.com	Stinson, Leonard, Street LLP	150 S 5th St Ste 2300  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_16-366_M-16-366
David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St  Duluth, MN 558022093	Electronic Service	No	OFF_SL_16-366_M-16-366
Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP	33 South Sixth St Ste 4200  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_16-366_M-16-366
Rita	Mulkern	rita.mulkern@mdu.com	Great Plains Natural Gas	400 N 4th St  Bismarck, ND 58501	Electronic Service	No	OFF_SL_16-366_M-16-366
Gary	Myers	garym@hpuc.com	Hibbing Public Utilities	PO Box 249  Hibbing, MN 55746	Electronic Service	No	OFF_SL_16-366_M-16-366

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Susan K	Nathan	snathan@appliedenergygroup.com	Applied Energy Group	2215 NE 107th Ter  Kansas City, MO 64155-8513	Electronic Service	No	OFF_SL_16-366_M-16-366
Carl	Nelson	cnelson@mncee.org	Center for Energy and Environment	212 3rd Ave N Ste 560  Minneapolis, MN 55401	Electronic Service	No	OFF_SL_16-366_M-16-366
Samantha	Norris	samanthanorris@alliantenergy.com	Interstate Power and Light Company	200 1st Street SE PO Box 351  Cedar Rapids, IA 524060351	Electronic Service	No	OFF_SL_16-366_M-16-366
Gary	Oetken	goetken@agp.com	Ag Processing, Inc.	12700 West Dodge Road P.O. Box 2047 Omaha, NE 681032047	Electronic Service	No	OFF_SL_16-366_M-16-366
Audrey	Partridge	audrey.peer@centerpointenergy.com	CenterPoint Energy	505 Nicollet Mall  Minneapolis, Minnesota 55402	Electronic Service	No	OFF_SL_16-366_M-16-366
James	Phillippo	jophillippo@minnesotaenergyresources.com	Minnesota Energy Resources Corporation	PO Box 19001  Green Bay, WI 54307-9001	Electronic Service	No	OFF_SL_16-366_M-16-366
Lisa	Pickard	lpickard@minnkota.com	Minnkota Power Cooperative	1822 Mill Rd PO Box 13200 Grand Forks, ND 582083200	Electronic Service	No	OFF_SL_16-366_M-16-366
Bill	Poppert		Technology North	2433 Highwood Ave  St. Paul, MN 55119	Paper Service	No	OFF_SL_16-366_M-16-366
Scott	Reimer	reimer@federatedrea.coop	Federated Rural Electric Assoc.	77100 US Highway 71 PO Box 69 Jackson, MN 56143	Electronic Service	No	OFF_SL_16-366_M-16-366
Dave	Reinke	dreinke@dakotaelectric.com	Dakota Electric Association	4300 220th St W  Farmington, MN 55024-9583	Electronic Service	No	OFF_SL_16-366_M-16-366

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Richard	Savelkoul	rsavelkoul@martinsquires.com	Martin & Squires, P.A.	332 Minnesota Street Ste W2750  St. Paul, MN 55101	Electronic Service	No	OFF_SL_16-366_M-16-366
Bruce	Sayler	bruces@connexusenergy.com	Connexus Energy	14601 Ramsey Boulevard  Ransey, MN 55303	Electronic Service	No	OFF_SL_16-366_M-16-366
Christopher	Schoenherr	cp.schoenherr@smmpa.org	SMPMPA	500 First Ave SW  Rochester, MN 55902-3303	Electronic Service	No	OFF_SL_16-366_M-16-366
Cindy	Schweitzer Rott	cindy.schweitzer@clearesult.com	CLEAResult's	S12637A Merrilee Rd.  Spring Green, WI 53588	Electronic Service	No	OFF_SL_16-366_M-16-366
Steve	Seidl	N/A	EnerChange	23505 Smithtown Rd Ste 280  Shorewood, MN 55331	Paper Service	No	OFF_SL_16-366_M-16-366
Anna	Sherman	anna.sherman@centerpointenergy.com	CenterPoint Energy	505 Nicollet Mall PO Box 59038 Minneapolis, MN 55459	Electronic Service	No	OFF_SL_16-366_M-16-366
Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.	76 W Kellogg Blvd  St. Paul, MN 55102	Electronic Service	No	OFF_SL_16-366_M-16-366
Jeffrey	Springer	jef@dairynet.com	Dairyland Power Cooperative	3200 East Avenue South  La Crosse, WI 54601	Electronic Service	No	OFF_SL_16-366_M-16-366
Grey	Staples	gstaples@mendotagroup.com	The Mendota Group LLC	1830 Fargo Lane  Mendota Heights, MN 55118	Electronic Service	No	OFF_SL_16-366_M-16-366
Leo	Steidel	N/A	The Weidt Group	5800 Baker Rd  Minnetonka, MN 55345	Paper Service	No	OFF_SL_16-366_M-16-366

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Richard	Szydlowski	rszydlowski@mncee.org	Center for Energy & Environment	212 3rd Ave N Ste 560 Minneapolis, MN 55401-1459	Electronic Service	No	OFF_SL_16-366_M-16-366
Michael	T'Kach	MTKach@enerchange.org	EnerChange.Org	2642 Irving Ave S Minneapolis, MN 55408	Electronic Service	No	OFF_SL_16-366_M-16-366
SaGonna	Thompson	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_16-366_M-16-366
Steve	Tomac	stomac@bepc.com	Basin Electric Power Cooperative	1717 E Interstate Ave Bismarck, ND 58501	Electronic Service	No	OFF_SL_16-366_M-16-366
Katie	Topinka	katie.topinka@state.mn.us	Minnesota Housing Finance Agency	400 Sibley Street Suite 300 St. Paul, MN 55101	Electronic Service	No	OFF_SL_16-366_M-16-366
Sharon N.	Walsh	swalsh@shakopeeutilities.com	Shakopee Public Utilities	255 Sarazin St Shakopee, MN 55379	Electronic Service	No	OFF_SL_16-366_M-16-366
Robert	Walsh	bwalsh@mnvalleyrec.com	Minnesota Valley Coop Light and Power	PO Box 248 501 S 1st St Montevideo, MN 56265	Electronic Service	No	OFF_SL_16-366_M-16-366
Cam	Winton	cwinton@mnchamber.com	Minnesota Chamber of Commerce	400 Robert Street North Suite 1500 St. Paul, Minnesota 55101	Electronic Service	No	OFF_SL_16-366_M-16-366
Robyn	Woeste	robynwoeste@alliantenergy.com	Interstate Power and Light Company	200 First St SE Cedar Rapids, IA 52401	Electronic Service	No	OFF_SL_16-366_M-16-366
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_16-366_M-16-366



[illegible]

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Leigh	Currie	lcurrie@mncenter.org	Minnesota Center for Environmental Advocacy	26 E. Exchange St., Suite 206  St. Paul, Minnesota 55101	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Jeffrey A.	Daugherty	jeffrey.daugherty@centerpointenergy.com	CenterPoint Energy	800 LaSalle Ave  Minneapolis, MN 55402	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
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
Chris	Duffrin	chrisd@thenec.org	Neighborhood Energy Connection	624 Selby Avenue  St. Paul, MN 55104	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Jim	Erchul	jerchul@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
Emma	Fazio	emma.fazio@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	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 500  Saint Paul, MN 551012198	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
Angela E.	Gordon	angela.e.gordon@lmco.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
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
Stephan	Gunn	sgunn@appliedenergygroup.com	Applied Energy Group	1941 Pike Ln  De Pere, WI 54115	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
Tony	Hainault	anthony.hainault@co.hennepin.mn.us	Hennepin County DES	701 4th Ave S Ste 700  Minneapolis, MN 55415-1842	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
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	hendricksj@owatonnautilities.com	Owatonna Public Utilities	PO Box 800 208 S Walnut Ave Owatonna, MN 55060-2940	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
Karolanne	Hoffman	kmh@dairynet.com	Dairyland Power Cooperative	PO Box 817  La Crosse, WI 54602-0817	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
Randy	Hoffman	rhoffman@eastriver.coop	East River Electric Power Coop	121 SE 1st St PO Box 227 Madison, SD 57042	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
Tom	Holt	tholt@eastriver.coop	East River Electric Power Coop., Inc.	PO Box 227  Madison, SD 57042	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Jim	Horan	Jim@MREA.org	Minnesota Rural Electric Association	11640 73rd Ave N  Maple Grove, MN 55369	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Anne	Hunt	anne.hunt@ci.stpaul.mn.us	City of St. Paul	390 City Hall 15 West Kellogg Boulevard  Saint Paul, MN 55102	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
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
Joel W.	Kanvik	joel.kanvik@enbridge.com	Enbridge Energy Company, Inc.	4628 Mike Colalillo Dr  Duluth, MN 55807	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
Tina	Koecher	tkoecher@mnpower.com	Minnesota Power	30 W Superior St  Duluth, MN 558022093	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Kelly	Lady	kellyl@austinutilities.com	Austin Utilities	400 4th St NE  Austin, MN 55912	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Martin	Lepak	Martin.Lepak@aeoa.org	Arrowhead Economic Opportunity	702 S 3rd Ave  Virginia, MN 55792	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
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	No	SPL_SL__CIP SPECIAL SERVICE LIST

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Nick	Mark	nick.mark@centerpointenergy.com	CenterPoint Energy	800 LaSalle Ave Minneapolis, MN 55402	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	jmm@dairynet.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,Leonard, Street LLP	150 S 5th St Ste 2300 Minneapolis, MN 55402	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
David	Moeller	dmoeller@allte.com	Minnesota Power	30 W Superior St Duluth, MN 558022093	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Andrew	Moratzka	apmoratzka@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Gary	Myers	garym@hpuc.com	Hibbing Public Utilities	1902 E 6th Ave Hibbing, MN 55746	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Susan K	Nathan	snathan@appliedenergygroup.com	Applied Energy Group	2215 NE 107th Ter Kansas City, MO 64155-8513	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Carl	Nelson	cnelson@mncee.org	Center for Energy and Environment	212 3rd Ave N Ste 560 Minneapolis, MN 55401	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
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
Gary	Oetken	goetken@agp.com	Ag Processing, Inc.	12700 West Dodge Road P.O. Box 2047 Omaha, NE 681032047	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Audrey	Partridge	audrey.peer@centerpointenergy.com	CenterPoint Energy	800 Lasalle Avenue - 14th Floor  Minneapolis, Minnesota 55402	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Lisa	Pickard	lpickard@minnkota.com	Minnkota Power Cooperative	1822 Mill Rd PO Box 13200 Grand Forks, ND 582083200	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Bill	Poppert		Technology North	2433 Highwood Ave  St. Paul, MN 55119	Paper 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
Christopher	Schoenherr	cp.schoenherr@smmpa.org	SMMPA	500 First Ave SW  Rochester, MN 55902-3303	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Cindy	Schweitzer Rott	cindy.schweitzer@clearesult.com	CLEAResult's	S12637A Merrilee Rd.  Spring Green, WI 53588	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Anna	Sherman	anna.sherman@centerpointenergy.com	CenterPoint Energy	505 Nicollet Mall PO Box 59038 Minneapolis, MN 55459	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

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Leo	Steidel	N/A	The Weidt Group	5800 Baker Rd  Minnetonka, MN 55345	Paper Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Richard	Szydlowski	rszydlowski@mncee.org	Center for Energy & Environment	212 3rd Ave N Ste 560  Minneapolis, MN 55401-1459	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
SaGonna	Thompson	Regulatory.records@xcel energy.com	Xcel Energy	414 Nicollet Mall FL 7  Minneapolis, MN 554011993	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Steve	Tomac	stomac@bepc.com	Basin Electric Power Cooperative	1717 E Interstate Ave  Bismarck, ND 58501	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Sharon N.	Walsh	swalsh@shakopeeutilities.c om	Shakopee Public Utilities	255 Sarazin St  Shakopee, MN 55379	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Robyn	Woeste	robynwoeste@alliantenerg y.com	Interstate Power and Light Company	200 First St SE  Cedar Rapids, IA 52401	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Daniel P	Wolf	dan.wolf@state.mn.us	Public Utilities Commission	121 7th Place East Suite 350 St. Paul, MN 551012147	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST