

Minnesota Energy Resources Corporation 2685 145th Street West

Rosemount, MN 55068 www.minnesotaenergyresources.com

May 1, 2018

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

VIA ELECTRONIC FILING

Re: In the Matter of the Petition of Minnesota Energy Resources Corporation for Approval of the 2017 Conservation Improvement Program Tracker Account, Demand-Side Management Financial Incentive, and Conservation Cost Recovery Adjustment Factor

Docket No. G011/M-18-

Dear Mr. Wolf:

Enclosed please find the Petition of Minnesota Energy Resources Corporation ("MERC") for Approval of the 2017 Conservation Improvement Program ("CIP") Tracker Account, Demand-Side Management ("DSM") Financial Incentive, and Conservation Cost Recovery Adjustment ("CCRA") Factor.

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

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

Please contact me at (651) 322-8965 if you have any questions.

Sincerely yours,

Amber S. Lee
Amber S. Lee
Regulatory and Legislative Affairs Manager
Minnesota Energy Resources Corporation

cc: Service List Enclosure

STATE OF MINNESOTA BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

Nancy Lange Chair
Dan Lipschultz Commissioner
Matthew Schuerger Commissioner
Katie J. Sieben Commissioner
John A. Tuma Commissioner

In the Matter of the Petition of Minnesota Energy Resources Corporation for Approval of the 2017 Conservation Improvement Program Tracker Account, Demand-Side Management Financial Incentive, and Conservation Cost Recovery Adjustment Factor Docket No. G011/M-18-___

PETITION

INTRODUCTION

Minnesota Energy Resources Corporation ("MERC" or the "Company") submits this

Petition pursuant to the Minnesota Public Utilities Commission's ("Commission") Order

Establishing Utility Performance Incentives for Energy Conservation issued in Docket No.

E,G999/CI-08-133. In this filing, MERC seeks approval of its Conservation Improvement

Program ("CIP") tracker account balance and a Demand-Side Management ("DSM") financial incentive for the period January 1, 2017, through December 31, 2017. MERC is also seeking

Commission approval of a proposed modified Conservation Cost Recovery Adjustment

("CCRA"). MERC filed its CIP Status Report covering the same period in Docket No. G011/CIP-16-120.01.

I. Summary of Filing

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

II. Service on Other Parties

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

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

III. <u>General Filing Information</u>

Pursuant to Minn. R. 7825.3200, 7829.3500, and 7829.1300, MERC provides the following information:

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

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

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

Kristin M. Stastny Briggs and Morgan, P.A. 2200 IDS Center 80 South Eighth Street Minneapolis, MN 55402 kstastny@briggs.com (612) 977-8656

C. Date of Filing and Proposed Effective Date

MERC is submitting this filing on May 1, 2018. MERC proposes that the new CCRA factor be effective August 1, 2018.

D. Statute Controlling Schedule for Processing the Filing

Minnesota Statutes section 216B.16, subd. 1, allows a utility to place a rate change into effect upon 60 days' notice to the Commission, unless the Commission otherwise orders.

Minnesota Statutes section 216B.16, subdivisions 6b-6c further allow public utilities to file rate schedules providing for annual recovery of actual conservation costs and approved incentives.

Under Minn. R. 7829.0100, subp. 11, this Petition constitutes a miscellaneous filing because no determination of the Company's general revenue requirement is necessary. Minnesota Rule 7829.1400, subp. 1, permits initial comments on miscellaneous filings to be made within 30 days of filing with reply comments due 10 days thereafter.

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

Ambor C. Loo

Amber S. Lee Regulatory and Legislative Affairs Manager ASLee@integrysgroup.com 2685 145th Street West Rosemount, MN 55068 (651) 322-8965

IV. <u>Description and Purpose of Filing</u>

A. Background

In this Petition, MERC seeks the Commission's approval of its CIP tracker account balances as of December 31, 2017. Additionally, MERC seeks Commission approval of a DSM financial incentive for 2017 in the amount of \$1,694,489. MERC also seeks Commission approve of a CCRA of \$0.00000 per therm, with a proposed effective date of August 1, 2018.

B. 2017 CIP Tracker Account

On May 1, 2017, MERC submitted a petition for approval of its 2016 CIP tracker account activity, DSM financial incentive, and revised CCRA in Docket No. G011/M-17-340. Specifically, MERC requested that the Commission approve the Company's 2016 DSM financial incentive of \$3,245,000; approve MERC's 2016 CIP tracker activity; and approve a revised CCRA of \$0.01024 per therm to be effective January 1, 2018. The Commission approved MERC's 2016 CIP tracker activity and DSM incentive by Order dated August 16, 2017.

The table below provides a summary of activities in the MERC CIP tracker account in 2017.

MERC-CIP Tracker 2017 Activity

| Beginning Balance – January 1, 2017 | \$(158,237.55) |
|--|-------------------|
| CIP Expenses – January 1, 2017 – December 31, 2017 | \$10,666,998.57 |
| Carrying Charges – January 1, 2017 – December 31, 2017 | \$(56,497.04) |
| DSM Financial Incentive | \$3,245,000.00 |
| CIP Recoveries – January 1, 2017 – December 31, 2017 | \$(14,298,794.88) |
| Ending Balance – December 31, 2017 | \$(601,530.90) |

Attachment A includes MERC's 2017 CIP tracker account activity.

C. Proposed DSM Financial Incentive

1. Calculation of DSM Financial Incentive

MERC seeks Commission approval of a DSM financial incentive of \$1,694,489 for 2017 based on energy savings of 402,989 dekatherms ("Dth"), in accordance with the Commission's August 5, 2016, Order Adopting Modifications to Shared Savings Demand-Side Management Financial Incentive Plan in Docket No. E,G999/CI-08-133. Supporting documentation is provided in Attachment B.

MERC has excluded NGEA assessments in the amount of \$157,944.40 from the calculation of net benefits consistent with the Commission's August 5, 2016, Order in Docket No. E,G999/CI-08-133.¹

2. Statutory Criteria

In Docket No. E,G999/CI-08-133, the Commission adopted a new Shared Savings Model to be used to calculate utility financial incentives for energy conservation starting with the calendar year 2010. Most recently, on August 5, 2016, the Commission issued an Order Adopting Modifications to Shared Savings Demand Side Management Financial Incentive Plan in Docket No. E,G999/CI-08-133, modifying the shared savings incentive model effective 2017-2019.

¹ Order at 26.

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

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

The four criteria are discussed below.

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

The newly-revised Shared Savings Model authorizes financial incentives for natural gas utilities that achieve energy savings of at least 0.7 percent of the utility's retail sales. For a utility that achieves energy savings equal to 0.7 percent of retail sales, the utility is awarded a share of net benefits. For each additional 0.1 percent of energy savings the utility achieves, the net benefits awarded increase by an additional 0.75 percent until the utility achieves a savings of 1.2 percent of retail sales. For savings levels of 1.2 percent and higher, the utility is awarded a share of the net benefits equal to the Net Benefits Cap. The Net Benefit Cap for 2017 is 13.5 percent; for 2018 is 12.0 percent; and for 2019 is 10.0 percent.

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

completed customer conservation measures, at and beyond the 1.5 percent energy savings goal.

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

MERC's plan is compatible with the interest of utility ratepayers and other interested parties. The incentive is designed to tie the financial incentive to the utility's progress towards meeting the 1.5 percent energy savings goal. Additionally, the incentive will not exceed the net benefits created through the savings, and therefore ratepayers receive the majority of the benefits achieved under the Company's CIP program. Specifically, the new shared savings DSM incentive plan caps the incentive awarded at 13.5 percent of net benefits in 2017.

(3) Whether the plan links the incentive to the utility's performance in achieving costeffective conservation.

The new shared savings DSM incentive plan links the incentive to the Company's progress toward the 1.5 percent energy savings goal, but the incentive awarded will not exceed the net benefits created through savings. The incentive therefore encourages the utility to achieve cost-effective conservation.

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

MERC's incentive plan does not conflict with other provisions of Chapter 216B, and is consistent with the Commission's August 5, 2016, Order Adopting Modifications to Shared Savings Demand-Side Management Financial Incentive Plan in Docket No. E,G999/CI-08-133.

D. Proposed CCRA

In the Company's 2008 rate case, the Commission approved a CCRA for the Company with an initial rate of \$0.0000 per therm and required the Company to file adjustment reports by May 1 of each calendar year. The current CCRA factor of \$0.01024 was approved by the Commission by Order dated August 16, 2017, in Docket No. G011/M-17-340 and was effective January 1, 2018.

The MERC tracker balance as of January 1, 2018, is an over-recovery of \$601,530.90. The estimated MERC CIP tracker balance as of January 1, 2019, based on anticipated expense and collections via the CCRC, and assuming the CCRA is set to \$0.00000 effective August 1, 2018, is an over-collection of \$4,303,640.32. As a result, MERC proposes to set the CCRA factor to \$0.00000 effective August 1, 2018, or on the first billing period after the Commission's Order in order to reduce the over-collection balance on the CIP tracker through 2019. As shown in Attachment C, setting the CCRA to \$0.00000 on August 1, 2018, is projected to result in a tracker balance of \$(122,938.42) as of December 31, 2019. MERC will propose a reinstatement of the CCRA factor in a future CIP Tracker, DSM Incentive, and CCRA Petition once the CIP Tracker balance is again under-recovered.

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

Effective [insert date], the CCRA (conservation cost recovery adjustment) has been reduced to \$0.00000 per therm. The CCRA is an annual adjustment to true-up under-recovery or over-recovery of CIP (conservation improvement program) expenses.

E. Effect of Change on MERC Revenue

This Petition has no effect on MERC revenue. The CCRA is forecasted to recover the difference between the CIP expenses actually recovered through the CCRC and the CIP tracker account balance as of January 2018 over approximately one year. In particular, as shown in Attachment C, setting the CCRA to \$0.00000 on August 1, 2018, is projected to result in a tracker balance of \$(122,938.42) as of December 31, 2019.

F. CIP-Exempt Customer Billing Review

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

future CIP tracker filings documenting that its CIP-exempt customers have been properly identified and are being properly billed.

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

CONCLUSION

MERC respectfully requests that the Commission approve its CIP tracker account balances for 2017 with an ending balance of \$(601,530.90). Additionally, MERC requests that the Commission approve a consolidated 2017 DSM financial incentive of \$1,694,489. Finally, MERC requests approval to set the CCRA factor to \$0.00000 per therm effective August 1, 2018.

Dated: May 1, 2018 Respectfully submitted,

BRIGGS AND MORGAN, P.A.

By: /s/ Kristin M. Stastny
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Attorney for Minnesota Energy Resources Corporation

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STATE OF MINNESOTA BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

Nancy Lange Chair
Dan Lipschultz Commissioner
Matthew Schuerger Commissioner
Katie J. Sieben Commissioner
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In the Matter of the Petition of Minnesota Energy Resources Corporation for Approval of the 2017 Conservation Improvement Program Tracker Account, Demand-Side Management Financial Incentive, and Conservation Cost Recovery Adjustment Factor

Docket No. G011/M-18-___

SUMMARY OF FILING

Please take notice that on May 1, 2018, Minnesota Energy Resources Corporation ("MERC") submitted to the Minnesota Public Utilities Commission ("Commission") a Petition for Approval of its 2017 Conservation Improvement Program ("CIP") tracker account balance, 2017 Demand Side Management ("DSM") financial incentive, and Conservation Cost Recovery Adjustment factor.

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

https://www.edockets.state.mn.us/EFiling/edockets/searchDocuments.do?method=showeDocketsSearch&showEdocket=true&userType=public. Once on the eDockets homepage, this document can be accessed through the "Search Documents" link and by entering the date of the filing.

ATTACHMENT A.

Minnesota Energy Resources CIP Tracker Balance Calculation As of 12/31/2017

| | PY Ending Balance | January | February | March | April | May | June | July | August | September | October | November | December | CY Total |
|--|----------------------|----------------|----------------|----------------|----------------|----------------|----------------|----------------|----------------|----------------|----------------|----------------|----------------|------------------|
| Beginning Balance 1. (excl. carry cost through July 2015) Acquired IPL tracker balance | | (158,237.55) | (1,810,792.95) | (3,169,065.26) | (4,016,319.13) | (4,931,968.06) | (5,453,013.77) | (4,850,941.04) | (4,717,956.08) | (1,281,479.29) | (1,053,888.36) | (562,616.22) | (889,423.29) | (158,237.55) |
| 2. Expenses | | 715,590.23 | 694,653.20 | 855,892.73 | 569,444.25 | 468,541.90 | 1,298,982.07 | 575,022.23 | 658,240.42 | 707,394.04 | 1,056,303.75 | 913,132.32 | 2,153,801.43 | 10,666,998.57 |
| 3. Recoveries | | (2,365,077.02) | (2,047,555.14) | (1,696,340.44) | (1,476,735.35) | (980,346.81) | (688,688.82) | (434,042.11) | (464,592.01) | (478,017.17) | (564,078.19) | (1,238,432.15) | (1,864,889.67) | (14,298,794.88) |
| 4. Incentives | | | | | | | | | 3,245,000.00 | | | | | 3,245,000.00 |
| Subtotal Balance 5. Line 1+2-3+4) | | (1,807,724.34) | (3,163,694.89) | (4,009,512.98) | (4,923,610.23) | (5,443,772.97) | (4,842,720.52) | (4,709,960.92) | (1,279,307.66) | (1,052,102.42) | (561,662.80) | (887,916.05) | (600,511.53) | (545,033.86) |
| Monthly Carry Cost ** 6. (Line 5 x .00169750) | | (3,068.61) | (5,370.37) | (6,806.15) | (8,357.83) | (9,240.80) | (8,220.52) | (7,995.16) | (2,171.62) | (1,785.94) | (953.42) | (1,507.24) | (1,019.37) | (56,497.04) - |
| Ending Balance 7 (Line 5+6) | (158,237.55) | (1,810,792.95) | (3,169,065.26) | (4,016,319.13) | (4,931,968.06) | (5,453,013.77) | (4,850,941.04) | (4,717,956.08) | (1,281,479.29) | (1,053,888.36) | (562,616.22) | (889,423.29) | (601,530.90) | (601,530.90) |

2.0370% annual rate 12 months

0.00169750 monthly rate

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

^{**} Carry Cost charge set at 2.037% based on 2016 Rate Case approval:

Minnesota Energy Resources CCRC Recovery by Class (in therms) As of 12/31/2017

| CCRC: | January | February | March | April | May | June | July | August | September | October | November | December | YTD |
|--------------------|-----------------|-----------------|-----------------|--------------------|---------------|--------------|---------------|---------------|---------------|---------------|---------------|-----------------|------------------|
| Gas Residential | 33,028,478 | 28,093,805 | 23,361,988 | 18,823,639 | 11,254,609 | 5,928,355.00 | 3,368,999.00 | 2,960,045 | 3,113,902 | 4,655,681 | 14,327,088 | 23,484,237 | 172,400,826 |
| Gas Small C&I | 1,581,565 | 1,765,656 | 1,052,465 | 620,970 | 1,164,100 | (669,777.00) | 140,229.70 | 166,828 | 117,647 | 148,132 | 939,177 | 1,048,970 | 8,075,963 |
| Gas Large C&I | 18,907,322 | 14,220,207 | 12,753,501 | 10,880,386 | 6,612,914 | 4,034,725.00 | 2,753,709.20 | 1,753,511 | 2,645,028 | 3,287,822 | 8,494,544 | 13,433,270 | 99,776,940 |
| Gas Large C&I Int. | 4,291,409 | 3,676,992 | 4,443,284 | 3,551,710 | 2,363,679 | 1,725,104.00 | 1,475,897.60 | 1,107,357 | 1,329,373 | 1,715,034 | 4,217,073 | 6,979,584 | 36,876,496 |
| Transport of Gas | 7,308,985 | 9,040,906 | 7,476,953 | 8,111,797 | 6,479,221 | 8,563,303.00 | 4,602,431.20 | 7,221,835 | 6,385,667 | 6,232,017 | 7,234,861 | 8,078,952 | 86,736,928 |
| Total Therms | 65,117,759 | 56,797,566 | 49,088,191 | 41,988,502 | 27,874,523 | 19,581,710 | 12,341,267 | 13,209,576 | 13,591,617 | 16,038,686 | 35,212,743 | 53,025,013 | 403,867,153 |
| CCRC rate * | 0.02767 | 0.02767 | 0.02767 | 0.02767 | 0.02767 | 0.02767 | 0.02767 | 0.02767 | 0.02767 | 0.02767 | 0.02767 | 0.02767 | 0.02767 |
| CCRC Recovery | \$ 1,801,808.40 | \$ 1,571,588.65 | \$ 1,358,270.24 | \$ 1,161,821.85 \$ | 771,288.05 \$ | 541,825.92 | \$ 341,482.85 | \$ 365,508.97 | \$ 376,080.04 | \$ 443,790.44 | \$ 974,336.60 | \$ 1,467,202.12 | \$ 11,175,004.13 |

^{*} CCRC Final rate effective Jan 1, 2016

Minnesota Energy Resources CCRA Recovery by Class (in therms) As of 12/31/2017

| CCRA: | January | February | March | April | May | June | July | August | September | October | November | December | YTD |
|--------------------|---------------|----------------|---------------|---------------|---------------|---------------|--------------|--------------|---------------|---------------|---------------|---------------|-----------------|
| Gas Residential | 33,028,478 | 28,093,644 | 23,362,013 | 18,823,604 | 11,254,587 | 5,928,366 | 3,368,967 | 2,961,537 | 3,113,902 | 4,655,361 | 14,327,085 | 23,484,231 | 172,401,775 |
| Gas Small C&I | 1,581,565 | 1,765,656 | 1,052,465 | 620,970 | 1,164,100 | (669,777) | 140,230 | 166,828 | 117,647 | 148,132 | 939,177 | 1,048,970 | 8,075,963 |
| Gas Large C&I | 18,907,322 | 14,226,430 | 12,753,501 | 10,880,386 | 6,612,914 | 4,034,725 | 2,753,709 | 1,753,515 | 2,645,028 | 3,287,822 | 8,494,544 | 13,433,270 | 99,783,167 |
| Gas Large C&I Int. | 4,291,409 | 3,676,992 | 4,443,284 | 3,551,710 | 2,363,679 | 1,725,104 | 1,475,898 | 1,107,357 | 1,329,373 | 1,715,034 | 4,217,073 | 6,979,584 | 36,876,496 |
| Transport of Gas | 7,308,985 | 9,040,906 | 7,476,953 | 8,111,797 | 6,479,221 | 8,563,303 | 4,602,431 | 7,221,835 | 6,385,667 | 6,232,017 | 7,234,861 | 8,078,952 | 86,736,928 |
| Total Therms | 65,117,759 | 56,803,628 | 49,088,216 | 41,988,467 | 27,874,501 | 19,581,721 | 12,341,234 | 13,211,072 | 13,591,617 | 16,038,366 | 35,212,740 | 53,025,007 | 403,874,329 |
| CCRA rate * | 0.00865 | 0.0075/0.00865 | 0.0075 | 0.0075 | 0.0075 | 0.0075 | 0.0075 | 0.0075 | 0.0075 | 0.0075 | 0.0075 | 0.0075 | |
| CCRA Recovery | \$ 563,268.62 | \$ 475,966.49 | \$ 338,070.20 | \$ 314,913.50 | \$ 209,058.76 | \$ 146,862.91 | \$ 92,559.26 | \$ 99,083.04 | \$ 101,937.13 | \$ 120,287.75 | \$ 264,095.55 | \$ 397,687.55 | \$ 3,123,790.75 |

CCRA = Conservation Cost Recovery Adjustment

ATTACHMENT B

| | A B C | | D | | E | | F | | G | | |
|----------|--|------|---------------|--|-------------------------|-------|--------------------------|------------|--------|------|---|
| 2 | Conservation Improvement Program (CIP) | RENE | FEIT COST FOR | R GAS CIPS Cost-Effe | ctiveness Analysis | | | | | | |
| 3 | Conservation improvement rrogram (on) | | | ota Department of Comr | | 006 | | | | | |
| 4 | Company: Minnesota Energy Resources | | | | | | | | | | |
| 5 6 | Project: TOTAL CIP - 2017 | R | | | | | | | | | |
| 7 | Input Data | K | | | | | First Year | | | | |
| 8 | | _ | | | | | | | | | |
| 9 | 1) Retail Rate (\$/Dth) = \$17.22 | | | Jtility Project Costs | | | | | | | |
| 10 11 | Escalation Rate = 4.00% |) | | a) Administrative & Ope | rating Costs = | | \$6,102,36 \$4,406,66 | | | | |
| | 2) Non-Gas Fuel Retail Rate (\$/Fuel Unit) = \$0.00 | | | b) Incentive Costs = c) Total Utility Project C | nsts = | | \$10,509,0 | | | | _ |
| 13 | Escalation Rate = 2.16% | | 100 | o, rotal ounty r rojout o | 5010 | | Ψ10,000,00 | | | | |
| 14 | Non-Gas Fuel Units (ie. kWh,Gallons, etc) = | | 17) D | Direct Participant Costs | (\$/Part.) = | | \$5 | 511 | | | |
| 15 | 2) 0 | | 401.5 | Daniela and N |)t- (A 16/D ::) | \ _ | | * 0 | | | |
| 16 17 | 3) Commodity Cost (\$/Dth) = \$4.27 Escalation Rate = 4.00% | | 18) P | Participant Non-Energy (Escalation Rate = | Costs (Annual \$/Part.) |) = | 0.0 | \$0 1% | | | |
| 18 | ±30diditoff (Nate = 4.007) | , | | Escalation Nate - | | | 0.00 | J /U | | | |
| 19 | 4) Demand Cost (\$/Unit/Yr) = \$129.27 | | 19) P | Participant Non-Energy | Savings (Annual \$/Pa | rt) = | | \$0 | | | |
| 20 | Escalation Rate = 4.00% | | | Escalation Rate = | | | 0.00 | 0% | | | |
| 21 22 | 5) Peak Reduction Factor = 1.00% | | 201 P | Project Life (Years) = | | | 1 | 3.9 | | | |
| 23 | 1.007 | • | 20/1 | . 5,500 20 (10010) | | | | | | | |
| 24 | 6) Variable O&M (\$/Dth) = \$0.05 | | 21) A | Avg. Dth/Part. Saved = | | | 14.9 | 90 | | | |
| 25 26 | Escalation Rate = 4.00% | | 22/ 4 | Na Non Goo Eugl Linite | /Part Saved - | | 0.0 | าก | | | |
| 26 27 | 7) Non-Gas Fuel Cost (\$/Fuel Unit) = \$0.00 | | | Avg Non-Gas Fuel Units Avg Additional Non-Ga | | ed = | 0.0 | | | | |
| 28 | Escalation Rate = 2.16% | | , | J : | | | 0 | - | | | |
| 29 | | | 23) N | Number of Participants = | : | | 27,0 | 44 | | | |
| 30 31 | 8) Non-Gas Fuel Loss Factor 0.00% |) | 24) T | Total Annual Dth Cours | _ | | 402,9 | 180 | | | |
| 31 32 | 9) Gas Environmental Damage Factor = \$0.3800 | | Z4) I | Total Annual Dth Saved | - | | 402,8 | צטי | | | |
| 33 | Escalation Rate = 2.16% | | 25) Ir | ncentive/Participant = | | | \$10 | 63 | | | |
| 34 | | | | | | | | | | | |
| 35 36 | 10) Non Gas Fuel Environmental Damage Factor = \$0.00 Escalation Rate = 0.009 | | | | | | | | | | |
| 37 | Escalation Rate - 0.007 |) | | | | | | | | | |
| 38 | 11) Participant Discount Rate = 2.55% | | | | | | | | | | |
| 39 | 40) Helita Discount Data | | | | | | | | | | |
| 40 41 | 12) Utility Discount Rate = 7.30% |) | | | | | | | | | |
| 42 | 13) Societal Discount Rate = 2.55% | | | | | | | | | | |
| 43 | | | | | | | | | | | |
| 44 | 14) General Input Data Year = 2016 | 6 | | | | | | | | | |
| 45 46 | 15) Project Analysis Year 1 = 2017 | , | | | | | | | | | |
| 46 47 | 15a) Project Analysis Year 1 = 2011 15a) Project Analysis Year 2 = 2018 | | | | | | | | | | |
| 48 | 15c) Project Analysis Year 3 = 2019 | | | | | | | | | | |
| 49 | | | | | | | | | | | |
| 50 51 | | | | | | | Triennial | | Trienn | ial | |
| 51 52 | Cost Summary 1st Yr | | Test | Results | | | NPV | | B/C | iai | |
| 53 | • | | | | | | | | | | |
| 54 | Utility Cost per Participant = \$388.59 | | Rate | payer Impact Measure | Test | | (\$66,565,93 | 37) | | 0.29 | |
| 55 56 | Cost per Participant per Dth = \$60.34 | | Utilit | ty Cost Test | | | \$16,561,39 | 96 | | 2.58 | |
| 57 | Lifetime Energy Reduction (Dth) 5,641,844 | | J.III. | ., | | | ψ10,001,0 | | | 2.00 | |
| 58 | | | Socie | etal Test | | | \$18,332,63 | 38 | | 1.92 | |
| 59 | Societal Cost per Dth \$3.53 | | D. (* | inimant Tant | | | \$404 470 O | 77 | | 0.05 | |
| 60 | | | Parti | icipant Test | | | \$101,470,60 | J/ | | 8.35 | |

2017 ACTUAL

Add Drop Down or Label for each Utility Name to specify

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

| Inputs | | Location: |
|---|--------------|--|
| 2013 Weather-Normalized Sales (Dth) | 53,488,276 | |
| 2014 Weather-Normalized Sales (Dth) | 56,095,257 | |
| 2015 Weather-Normalized Sales (Dth) | 48,615,230 | |
| 3-year Weather-Normalized Sales Average (Dth) | 52,732,921 | |
| 1.0% Energy Savings | 527,329 | |
| Increase Energy Savings per 0.1% Increase in Achievement Level | 52,733 | |
| Approved CIP Budget | \$11,749,536 | From Commissioner's Order approving 2017-2019 Triennial CIP Filing |
| Approved CIP Energy Savings Goal (Dth) | 531,810 | |
| Estimated Net Benefits at Energy Savings Goal | \$25,977,224 | From Utility 2017-2019 Triennial CIP Filing. |
| Energy savings at 1.5% (Dth) | 790,994 | |
| Incentive Calibration | | |
| Max Percent of Net Benefits Awarded | 13.5% | maximum net benefits awarded |
| Max Percent of Expenditures Awarded | 40.0% | |
| Earning Threshold | 0.7% | |
| Achievement Level Where Net Benefits Cap Begins | 1.2% | |
| Increase in Net Benefits Awarded Per 0.1% Increase in Achievement Level | 7.5 | % Points |

| Actual 2017 Achievements | |
|-------------------------------------|--------------|
| Expenditures | \$10,509,054 |
| Energy Saved (first year Dth saved) | 402,989 |
| Net Benefits Achieved | \$16,561,396 |
| Shared Savings Incentive Results | |
| Achievement Level | 0.76% |
| Percent of Net Benefits Awarded | 10.2316% |
| Financial Incentive Award | \$1,694,489 |
| Incentive/First Year Dth Saved \$ | \$4.2048 |
| Incentive/Net Benefits | 10.23% |
| Incentive/CIP Expenditures | 16.12% |

16%

| | | | | | | Incremental |
|--------------------|--------------|------------------|-------------------|-----------------|-------------------|----------------|
| Achievement | | Percent of Net | Estimated Net | | Average Incentive | Incentive Unit |
| Level (% of sales) | Energy Saved | Benefits Awarded | Benefits Achieved | Incentive Award | per unit Saved | Saved |
| 0.0% | 0 | 0.00% | \$0 | \$0 | \$0.000 | - |
| 0.1% | 52,733 | 0.00% | \$2,575,835 | \$0 | \$0.000 | \$0.000 |
| 0.2% | 105,466 | 0.00% | \$5,151,670 | \$0 | \$0.000 | \$0.000 |
| 0.3% | 158,199 | 0.00% | \$7,727,506 | \$0 | \$0.000 | \$0.000 |
| 0.4% | 210,932 | 0.00% | \$10,303,341 | \$0 | \$0.000 | \$0.000 |
| 0.5% | 263,665 | 0.00% | \$12,879,176 | \$0 | \$0.000 | \$0.000 |
| 0.6% | 316,398 | 0.00% | \$15,455,011 | \$0 | \$0.000 | \$0.000 |
| 0.7% | 369,130 | 9.75% | \$18,030,846 | \$1,758,008 | \$4.763 | \$33.338 |
| 0.8% | 421,863 | 10.50% | \$20,606,681 | \$2,163,702 | \$5.129 | \$7.693 |
| 0.9% | 474,596 | 11.25% | \$23,182,517 | \$2,608,033 | \$5.495 | \$8.426 |
| 1.0% | 527,329 | 12.00% | \$25,758,352 | \$3,091,002 | \$5.862 | \$9.159 |
| 1.1% | 580,062 | 12.75% | \$28,334,187 | \$3,612,609 | \$6.228 | \$9.891 |
| 1.2% | 632,795 | 13.50% | \$30,910,022 | \$4,172,853 | \$6.594 | \$10.624 |
| 1.3% | 685,528 | 13.50% | \$33,485,857 | \$4,520,591 | \$6.594 | \$6.594 |
| 1.4% | 738,261 | 13.50% | \$36,061,692 | \$4,868,328 | \$6.594 | \$6.594 |
| 1.5% | 790,994 | 13.50% | \$38,637,528 | \$5,216,066 | \$6.594 | \$6.594 |
| 1.6% | 843,727 | 13.50% | \$41,213,363 | \$5,563,804 | \$6.594 | \$6.594 |
| 1.7% | 896,460 | 13.50% | \$43,789,198 | \$5,911,542 | \$6.594 | \$6.594 |
| 1.8% | 949,193 | 13.50% | \$46,365,033 | \$6,259,279 | \$6.594 | \$6.594 |
| 1.9% | 1,001,925 | 13.50% | \$48,940,868 | \$6,607,017 | \$6.594 | \$6.594 |
| 2.0% | 1,054,658 | 13.50% | \$51,516,703 | \$6,954,755 | \$6.594 | \$6.594 |
| 2.1% | 1,107,391 | 13.50% | \$54,092,539 | \$7,302,493 | \$6.594 | \$6.594 |
| 2.2% | 1,160,124 | 13.50% | \$56,668,374 | \$7,650,230 | \$6.594 | \$6.594 |
| 2.3% | 1,212,857 | 13.50% | \$59,244,209 | \$7,997,968 | \$6.594 | \$6.594 |
| 2.4% | 1,265,590 | 13.50% | \$61,820,044 | \$8,345,706 | \$6.594 | \$6.594 |
| 2.5% | 1,318,323 | 13.50% | \$64,395,879 | \$8,693,444 | \$6.594 | \$6.594 |
| 2.6% | 1,371,056 | 13.50% | \$66,971,714 | \$9,041,181 | \$6.594 | \$6.594 |
| 2.7% | 1,423,789 | 13.50% | \$69,547,550 | \$9,388,919 | \$6.594 | \$6.594 |
| 2.8% | 1,476,522 | 13.50% | \$72,123,385 | \$9,736,657 | \$6.594 | \$6.594 |
| 2.9% | 1,529,255 | 13.50% | \$74,699,220 | \$10,084,395 | \$6.594 | \$6.594 |
| 3.0% | 1,581,988 | 13.50% | \$77,275,055 | \$10,432,132 | \$6.594 | \$6.594 |

2018 FORECAST

Add Drop Down or Label for each Utility Name to specify

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

| Inputs | | Location: |
|--|--------------|--|
| 2013 Weather-Normalized Sales (Dth) | 53,488,276 | |
| 2014 Weather-Normalized Sales (Dth) | 56,095,257 | |
| 2015 Weather-Normalized Sales (Dth) | 48,615,230 | |
| 3-year Weather-Normalized Sales Average (Dth) | 52,732,921 | |
| 1.0% Energy Savings | 527,329 | |
| Increase Energy Savings per 0.1% Increase in Achievement Level | 52,733 | |
| Approved CIP Budget | \$12,233,774 | From Commissioner's Order approving 2017-2019 Triennial CIP Filing |
| Approved CIP Energy Savings Goal (Dth) | 541,514 | |
| Estimated Net Benefits at Energy Savings Goal | \$25,832,208 | From Utility 2017-2019 Triennial CIP Filing. |
| Energy savings at 1.5% (Dth) | 790,994 | |

Incentive Calibration

Max Percent of Net Benefits Awarded

Max Percent of Expenditures Awarded

Earning Threshold

Achievement Level Where Net Benefits Cap Begins

Increase in Net Benefits Awarded Per 0.1% Increase in Achievement Level 12.0% maximum 35.0% 0.7% 1.2% 7.5 % Points ximum net benefits awarded

| Actual 2018 Achievements | | | | | | |
|-------------------------------------|--------------|--|--|--|--|--|
| Expenditures | \$12,233,774 | | | | | |
| Energy Saved (first year Dth saved) | 541,514 | | | | | |
| Net Benefits Achieved | \$25,832,208 | | | | | |
| Shared Savings Incentive Results | | | | | | |
| Achievement Level | 1.03% | | | | | |
| Percent of Net Benefits Awarded | 10.7017% | | | | | |
| Financial Incentive Award | \$2,764,497 | | | | | |
| Incentive/First Year Dth Saved \$ | \$5.1051 | | | | | |
| Incentive/Net Benefits | 10.70% | | | | | |
| Incentive/CIP Expenditures | 22.60% | | | | | |

| Estimated | Incentive | Levels b | y Achievement I | Level |
|-----------|-----------|----------|-----------------|-------|
|-----------|-----------|----------|-----------------|-------|

| | · | · | | | | Incremental |
|--------------------|--------------|------------------|-------------------|-----------------|-------------------|----------------|
| Achievement | | Percent of Net | Estimated Net | | Average Incentive | Incentive Unit |
| Level (% of sales) | Energy Saved | Benefits Awarded | Benefits Achieved | Incentive Award | per unit Saved | Saved |
| 0.0% | 0 | 0.00% | \$0 | \$0 | \$0.000 | - |
| 0.1% | 52,733 | 0.00% | \$2,515,554 | \$0 | \$0.000 | \$0.000 |
| 0.2% | 105,466 | 0.00% | \$5,031,108 | \$0 | \$0.000 | \$0.000 |
| 0.3% | 158,199 | 0.00% | \$7,546,662 | \$0 | \$0.000 | \$0.000 |
| 0.4% | 210,932 | 0.00% | \$10,062,217 | \$0 | \$0.000 | \$0.000 |
| 0.5% | 263,665 | 0.00% | \$12,577,771 | \$0 | \$0.000 | \$0.000 |
| 0.6% | 316,398 | 0.00% | \$15,093,325 | \$0 | \$0.000 | \$0.000 |
| 0.7% | 369,130 | 8.25% | \$17,608,879 | \$1,452,733 | \$3.936 | \$27.549 |
| 0.8% | 421,863 | 9.00% | \$20,124,433 | \$1,811,199 | \$4.293 | \$6.798 |
| 0.9% | 474,596 | 9.75% | \$22,639,987 | \$2,207,399 | \$4.651 | \$7.513 |
| 1.0% | 527,329 | 10.50% | \$25,155,541 | \$2,641,332 | \$5.009 | \$8.229 |
| 1.1% | 580,062 | 11.25% | \$27,671,096 | \$3,112,998 | \$5.367 | \$8.944 |
| 1.2% | 632,795 | 12.00% | \$30,186,650 | \$3,622,398 | \$5.724 | \$9.660 |
| 1.3% | 685,528 | 12.00% | \$32,702,204 | \$3,924,264 | \$5.724 | \$5.724 |
| 1.4% | 738,261 | 12.00% | \$35,217,758 | \$4,226,131 | \$5.724 | \$5.724 |
| 1.5% | 790,994 | 12.00% | \$37,733,312 | \$4,527,997 | \$5.724 | \$5.724 |
| 1.6% | 843,727 | 12.00% | \$40,248,866 | \$4,829,864 | \$5.724 | \$5.724 |
| 1.7% | 896,460 | 12.00% | \$42,764,420 | \$5,131,730 | \$5.724 | \$5.724 |
| 1.8% | 949,193 | 12.00% | \$45,279,974 | \$5,433,597 | \$5.724 | \$5.724 |
| 1.9% | 1,001,925 | 12.00% | \$47,795,529 | \$5,735,463 | \$5.724 | \$5.724 |
| 2.0% | 1,054,658 | 12.00% | \$50,311,083 | \$6,037,330 | \$5.724 | \$5.724 |
| 2.1% | 1,107,391 | 12.00% | \$52,826,637 | \$6,339,196 | \$5.724 | \$5.724 |
| 2.2% | 1,160,124 | 12.00% | \$55,342,191 | \$6,641,063 | \$5.724 | \$5.724 |
| 2.3% | 1,212,857 | 12.00% | \$57,857,745 | \$6,942,929 | \$5.724 | \$5.724 |
| 2.4% | 1,265,590 | 12.00% | \$60,373,299 | \$7,244,796 | \$5.724 | \$5.724 |
| 2.5% | 1,318,323 | 12.00% | \$62,888,853 | \$7,546,662 | \$5.724 | \$5.724 |
| 2.6% | 1,371,056 | 12.00% | \$65,404,408 | \$7,848,529 | \$5.724 | \$5.724 |
| 2.7% | 1,423,789 | 12.00% | \$67,919,962 | \$8,150,395 | \$5.724 | \$5.724 |
| 2.8% | 1,476,522 | 12.00% | \$70,435,516 | \$8,452,262 | \$5.724 | \$5.724 |
| 2.9% | 1,529,255 | 12.00% | \$72,951,070 | \$8,754,128 | \$5.724 | \$5.724 |
| 3.0% | 1,581,988 | 12.00% | \$75,466,624 | \$9,055,995 | \$5.724 | \$5.724 |

ATTACHMENT C'

MERC

| Proposed CCRA Effective August 1, 2018 | \$0.00 |
|--|--------|
| 1 , | |

| Forecasted beginning balance (January 1, 2019) | \$ (4,303,640.32) |
|--|-----------------------|
| | |
| Proposed Expenditures (January 2019-December 2019) | \$ 12,322,541.00 |
| | |
| Forecasted 2017 Incentive (to be approved in 2018) | \$ 1,694,489.00 |
| | |
| Forecasted 2018 Incentive (to be approved in 2019) | \$ 2,764,497.00 |
| | |
| Less forecasted CCRC recovery (January 2019-December 2019) | \$ (12,496,915.19) |
| | |
| Projected carrying charges for 2019 | \$ (103,909.91) |
| | |
| Forecasted December 31, 2019 Balance | \$ (122,938.42) |
| assuming CCRA of \$0.00000 effective August 1, 2018 | |

Minnesota Energy Resources Corporation Docket No. G011/M-18-___ Attachment C

ATTACHMENT D'

Clean Tariff Sheet

CONSERVATION COST RECOVERY CHARGE AND ADJUSTMENT

All Classes MERC

\$0.00000*

*Approved effective August 1, 2018 in Docket No. G011/M-18-___

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

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

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

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

Issued By: Theodore Eidukas

Vice President-Regulatory Affairs

Submittal Date: May 1, 2018

*Effective with bills issued on and after this date.

*Effective Date: Upon Commission Approval

Proposed Effective Date: August 1, 2018

Redline Tariff Sheet

CONSERVATION COST RECOVERY CHARGE AND ADJUSTMENT

All Classes MERC

\$0.000001024*

*Approved effective January August 1, 2018 in Docket No. G011/M-17-34018-

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

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

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

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

Issued By: Theodore Eidukas

Vice President-Regulatory Affairs

Submittal Date: October 13, 2017 May 1, 2018
*Effective with bills issued on and after this date.

In the Matter of the Petition of Minnesota Energy Resources Corporation for Approval of the 2017 Conservation Improvement Program Tracker Account, Demand-Side Management Financial Incentive, and Conservation Cost Recovery Adjustment Factor Docket Nos. G011/M-18-____

CERTIFICATE OF SERVICE

I, Lauren E. Pockl, hereby certify that on the 1st of May, 2018, on behalf of Minnesota Energy Resources Corporation, I electronically filed a true and correct copy of the enclosed initial filing on www.edockets.state.mn.us. Said documents were also served via U.S. mail and electronic service as designated on the attached service list.

Dated this 1st of May, 2018.

/s/ Lauren E. Pockl
Lauren E. Pockl

| First Name | Last Name | Email | Company Name | Address | Delivery Method | View Trade Secret | Service List Name |
|----------------|--------------------|--|---|--|--------------------|-------------------|---|
| Michael | Ahern | ahern.michael@dorsey.co m | Dorsey & Whitney, LLP | 50 S 6th St Ste 1500 Minneapolis, MN 554021498 | Electronic Service | No | GEN_SL_Minnesota Energy Resources Corporation_General Service List |
| Generic Notice | Commerce Attorneys | commerce.attorneys@ag.st ate.mn.us | Office of the Attorney General-DOC | 445 Minnesota Street Suite 1800 St. Paul, MN 55101 | Electronic Service | No | GEN_SL_Minnesota Energy Resources Corporation_General Service List |
| Seth | DeMerritt | ssdemerritt@integrysgroup. com | MERC (Holding) | 700 North Adams P.O. Box 19001 Green Bay, WI 543079001 | Electronic Service | No | GEN_SL_Minnesota Energy Resources Corporation_General Service List |
| an | Dobson | residential.utilities@ag.stat e.mn.us | Office of the Attorney General-RUD | 1400 BRM Tower 445 Minnesota St St. Paul, MN 551012130 | Electronic Service | No | GEN_SL_Minnesota Energy Resources Corporation_General Service List |
| Sharon | Ferguson | sharon.ferguson@state.mn .us | Department of Commerce | 85 7th Place E Ste 280 Saint Paul, MN 551012198 | Electronic Service | No | GEN_SL_Minnesota Energy Resources Corporation_General Service List |
| Daryll | Fuentes | dfuentes@usg.com | USG Corporation | 550 W Adams St Chicago, IL 60661 | Electronic Service | No | GEN_SL_Minnesota Energy Resources Corporation_General Service List |
| Amber | Lee | ASLee@minnesotaenergyr esources.com | Minnesota Energy Resources Corporation | 2665 145th St W Rosemount, MN 55068 | Electronic Service | No | GEN_SL_Minnesota Energy Resources Corporation_General Service List |
| Brian | Meloy | brian.meloy@stinson.com | Stinson,Leonard, Street LLP | 50 S 6th St Ste 2600 Minneapolis, MN 55402 | Electronic Service | No | GEN_SL_Minnesota Energy Resources Corporation_General Service List |
| Andrew | Moratzka | andrew.moratzka@stoel.co m | Stoel Rives LLP | 33 South Sixth St Ste 4200 Minneapolis, MN 55402 | Electronic Service | No | GEN_SL_Minnesota Energy Resources Corporation_General Service List |
| Colleen | Sipiorski | ctsipiorski@integrysgroup.c om | Minnesota Energy Resources Corporation | 700 North Adams Street Green Bay, WI 54307 | Electronic Service | No | GEN_SL_Minnesota Energy Resources Corporation_General Service List |

| First Name | Last Name | Email | Company Name | Address | Delivery Method | View Trade Secret | Service List Name |
|------------|-----------|-----------------------|-----------------------------|---|--------------------|-------------------|---|
| Kristin | Stastny | kstastny@briggs.com | Briggs and Morgan, P.A. | 2200 IDS Center 80 South 8th Street Minneapolis, MN 55402 | Electronic Service | No | GEN_SL_Minnesota Energy Resources Corporation_General Service List |
| Eric | Swanson | eswanson@winthrop.com | Winthrop & Weinstine | 225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629 | Electronic Service | No | GEN_SL_Minnesota Energy Resources Corporation_General Service List |
| Daniel P | Wolf | dan.wolf@state.mn.us | Public Utilities Commission | 121 7th Place East Suite 350 St. Paul, MN 551012147 | Electronic Service | No | GEN_SL_Minnesota Energy Resources Corporation_General Service List |

| First Name | Last Name | Email | Company Name | Address | Delivery Method | View Trade Secret | Service List Name |
|----------------|--------------------|---------------------------------------|---------------------------------------|--|---------------------------|-------------------|-----------------------------------|
| Tom | Balster | tombalster@alliantenergy.c om | Interstate Power & Light Company | PO Box 351 200 1st St SE Cedar Rapids, IA 524060351 | Electronic Service | No | SPL_SLCIP SPECIAL SERVICE LIST |
| Lisa | Beckner | lbeckner@mnpower.com | Minnesota Power | 30 W Superior St Duluth, MN 55802 | Electronic Service | No | SPL_SLCIP SPECIAL SERVICE LIST |
| William | Black | bblack@mmua.org | MMUA | Suite 400 3025 Harbor Lane No Plymouth, MN 554475142 | Electronic Service tth | No | SPL_SLCIP SPECIAL SERVICE LIST |
| Christina | Brusven | cbrusven@fredlaw.com | Fredrikson Byron | 200 S 6th St Ste 4000 Minneapolis, MN 554021425 | Electronic Service | No | SPL_SLCIP SPECIAL SERVICE LIST |
| Charlie | Buck | charlie.buck@oracle.com | Oracle | 760 Market St FL 4 San Francisco, CA 94102 | Electronic Service | No | SPL_SLCIP SPECIAL SERVICE LIST |
| Ray | Choquette | rchoquette@agp.com | Ag Processing Inc. | 12700 West Dodge Road PO Box 2047 Omaha, NE 68103-2047 | Electronic Service | No | SPL_SLCIP SPECIAL SERVICE LIST |
| Generic Notice | Commerce Attorneys | commerce.attorneys@ag.st ate.mn.us | Office of the Attorney General-DOC | 445 Minnesota Street Suite 1800 St. Paul, MN 55101 | Electronic Service | No | SPL_SLCIP SPECIAL SERVICE LIST |
| Gary | Connett | gconnett@grenergy.com | Great River Energy | 12300 Elm Creek Blvd N Maple Grove, MN 553694718 | Electronic Service | No | SPL_SLCIP SPECIAL SERVICE LIST |
| George | Crocker | gwillc@nawo.org | North American Water Office | PO Box 174 Lake Elmo, MN 55042 | Electronic Service | No | SPL_SLCIP SPECIAL SERVICE LIST |
| Carl | Cronin | Regulatory.records@xcele nergy.com | Xcel Energy | 414 Nicollet Mall FL 7 Minneapolis, MN 554011993 | Electronic Service | No | SPL_SLCIP SPECIAL SERVICE LIST |

| First Name | Last Name | Email | Company Name | Address | Delivery Method | View Trade Secret | Service List Name |
|------------|-----------|--|--|--|--------------------|-------------------|------------------------------------|
| Jill | Curran | jcurran@mnchamber.com | Minnesota Waste Wise | 400 Robert Street North Suite 1500 St. Paul, Minnesota 55101 | Electronic Service | No | SPL_SLCIP SPECIAI SERVICE LIST |
| Leigh | Currie | lcurrie@mncenter.org | Minnesota Center for Environmental Advocacy | 26 E. Exchange St., Suite 206 St. Paul, Minnesota 55101 | Electronic Service | No | SPL_SLCIP SPECIAI SERVICE LIST |
| an | Dobson | residential.utilities@ag.stat e.mn.us | Office of the Attorney General-RUD | 1400 BRM Tower 445 Minnesota St St. Paul, MN 551012130 | Electronic Service | No | SPL_SLCIP SPECIAI 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_SLCIP SPECIAL SERVICE LIST |
| lim | Erchul | jerchul@dbnhs.org | Daytons Bluff Neighborhood Housing Sv. | 823 E 7th St St. Paul, MN 55106 | Electronic Service | No | SPL_SL_CIP SPECIAI 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 |
| ∕lelissa S | Feine | melissa.feine@semcac.org | SEMCAC | PO Box 549 204 S Elm St Rushford, MN 55971 | Electronic Service | No | SPL_SL_CIP SPECIAL SERVICE LIST |
| Sharon | Ferguson | sharon.ferguson@state.mn .us | Department of Commerce | 85 7th Place E Ste 280 Saint Paul, MN 551012198 | Electronic Service | No | SPL_SL_CIP SPECIAL SERVICE LIST |

| First Name | Last Name | Email | Company Name | Address | Delivery Method | View Trade Secret | Service List Name |
|------------|-----------|--|-------------------------------------|--|--------------------|-------------------|------------------------------------|
| Angela E. | Gordon | angela.e.gordon@lmco.co m | 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@otpco.com | Otter Tail Power Company | 215 South Cascade Street Fergus Falls, MN 56537 | Electronic Service | No | SPL_SL_CIP SPECIAL SERVICE LIST |
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| Tina | Koecher | tkoecher@mnpower.com | Minnesota Power | 30 W Superior St Duluth, MN 558022093 | Electronic Service | No | SPL_SLCIP SPECIAL SERVICE LIST |
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