

September 6, 2018

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

RE: **Comments of Minnesota Department of Commerce, Division of Energy Resources**  
Docket No. E,G002/D-18-523

Dear Mr. Wolf:

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

Northern States Power Company's 2018 Annual Update of Remaining Lives and Depreciation Rates for Transmission, Distribution, and General Accounts.

The Petition was filed on July 31, 2018 by:

Lisa Perkett  
Principal Financial Consultant  
Xcel Energy  
414 Nicollet Mall, 4<sup>th</sup> Floor  
Minneapolis, MN 55401

The Department recommends that the Minnesota Public Utilities Commission (Commission) **approve the Petition, pending the submission of further information from the Company.** The Department is available to answer any questions the Commission may have.

Sincerely,

/s/ ANGELA BYRNE  
Financial Analyst  
651-539-1820

AB/ja  
Attachment



## Before the Minnesota Public Utilities Commission

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### Comments of the Minnesota Department of Commerce Division of Energy Resources

Docket No. E,G002/D-18-523

#### I. BACKGROUND AND SUMMARY OF THE FILING

On July 31, 2018, Northern States Power Company, doing business as Xcel Energy (Xcel or the Company) filed its first *Annual Update of Remaining Lives and Depreciation Rates for Transmission, Distribution, and General Accounts* (Petition or 2018 Depreciation Study) for the Company's electric, gas, and common utilities pursuant to Minn. Stat. section 216B.11 and Minn. Rules, parts 7825.0500 through 7825.0900.

In its previous depreciation filing (2017 depreciation study or 2017 filing),<sup>1</sup> Xcel proposed to change from the Average Service Life (ASL) depreciation to the Average Remaining Life (ARL) method. The Commission approved the change and required the Company to file annual updates of remaining lives and depreciation rates beginning July 31, 2018 and a five-year depreciation study by July 31, 2022.

Also in Xcel's 2017 filing, the Commission required Xcel to return to ratepayers the Electric Utility and electric portion of the Common Utility net decrease in depreciation expense due to the change in depreciation method through the 2018 capital true-up filing in Docket No. E002/GR-15-826. Xcel's 2018 capital true-up filing will be filed in 2019.

Finally, the Commission directed its Staff to prepare and issue a notice for supplemental comments in Xcel's pending 2018 Gas Utility Infrastructure Cost (GUIC) proceeding, in Docket No. G002/M-17-787, that required Xcel to address the gas utility's \$6.8 million decrease in depreciation expense and the appropriateness of using a true-up or some other kind of adjustment in the GUIC rider to reflect the decrease in depreciation expense.

In its current Petition, the Company stated that the impact to annual depreciation expense is a net decrease of \$449,371, or 0.14 percent; after allocating the Common Utility, the impact for the Electric Utility is a decrease of \$707,421 and for the Gas Utility is an increase of \$258,050. Xcel requested that the Commission approve the new depreciation rates effective January 1, 2019.

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<sup>1</sup> Docket No. E,G002/D-17-581, 2017 Five-Year Transmission, Distribution, and General Depreciation Study.

Table 1 below summarizes the depreciation impact of the proposed change, including Common Utility plant allocation. This table is presented in more detail, and by FERC account, on schedule B of Xcel's Petition.

**Table 1**  
**Depreciation Expense Impact of the Proposed Change**

	<b>Estimated Change to Depreciation before Allocations</b>	<b>Common Utility Allocations</b>	<b>Estimated Change to Depreciation after Allocations</b>
Electric Utility	(\$665,831)	(\$41,590)	(\$707,421)
Gas Utility	\$257,411	\$639	\$258,050
Common Utility	(\$40,951)	\$40,951	-
<b>Total Estimated Impact</b>	<b>(\$449,371)</b>	<b>-</b>	<b>(\$449,371)</b>

## **II. DEPARTMENT ANALYSIS**

The Minnesota Department of Commerce, Division of Energy Resources (Department) examined Xcel's petition for compliance with filing requirements and previous Commission Orders, and for reasonableness of the proposed ARL depreciation method, remaining lives, salvage rates, and overall depreciation accruals.

### **A. DEPRECIATION RULES**

The filing requirements for depreciation studies are set by Minnesota Statutes, Section 216B.11 and Minnesota Rules, parts 7825.0500-7825.0900. Public utilities are required to seek Commission approval of their depreciation rates and methods, and include certain information (e.g. plant balances, analyses of reserves, summaries of annual accruals, etc.) in their depreciation studies. Utilities must file depreciation studies at least once every five years, and must use straight-line depreciation unless a different method can be justified. When utilities use the average service life technique to depreciate group property accounts, the life and salvage factors, as well as the resulting depreciation rates, remain unchanged between studies. When companies choose the remaining-life technique for depreciating group property accounts, the underlying life and salvage factors may not change, but depreciation rates are adjusted annually to reflect the passage of time on remaining lives, as well as the impact of plant additions and retirements. Annual depreciation study updates are required when the remaining life technique is employed to allow the Commission the opportunity to approve changes in depreciation rates.

*B. REASONABLENESS OF PROPOSED AVERAGE REMAINING LIVES AND SALVAGE RATES*

The Department notes that the ARL method the Company proposed in its 2017 depreciation filing was approved in Xcel's previous five-year depreciation study in Docket No. E,G002/D-12-858 (Docket 12-858). However, the Company did not adopt the change due to the treatment afforded to the theoretical surplus in its 2012 and 2013 electric rate cases. The ARL method was ultimately adopted and approved in the 2017 depreciation study proceeding.

Xcel stated that this filing presents the change in remaining lives and depreciation rates solely due to plant changes through 2017. This passage of time can alter the average remaining life as new plant is added at a longer remaining life and older plant is retired at a shorter remaining life. All statistical parameters (average service life, net salvage, and retirement curves) are unchanged from the parameters approved in the 2017 depreciation study proceeding.<sup>2</sup>

*1. Average Remaining Lives*

The Department reviewed Xcel's proposed remaining lives in Schedule C of the Company's Petition. The Department also reviewed the proposed values from Schedule B in Xcel's 2017 filing to evaluate the changes year over year. The changes observed appeared reasonable when taken into context with the addition and retirement activity in each account. The Department concludes that the proposed average remaining lives are reasonable.

An analysis of the reasonableness of Xcel's proposed average remaining lives requires a comparison of the proposed remaining lives with the remaining lives approved in the 2017 proceeding, considering the addition and retirement activity as noted above. Since Xcel did not provide a comparison of the proposed average remaining lives in Schedule C to previously-approved remaining lives, the Department referred to the record in the 2017 proceeding. While a comparison of proposed lives to previously-approved ones is not explicitly required in Minnesota Rules, parts 7825.0500 through 7825.0900 as a filing requirement, it provides necessary context to satisfy the Company's burden, to show within the record of the instant proceeding, that its proposed average remaining lives are reasonable.<sup>3</sup> The Department requests that Xcel provide a current-versus-proposed comparison of the average remaining lives in its next annual filing.

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<sup>2</sup> *Petition*, page 4.

<sup>3</sup> Minnesota Rules Part 7825.0700, subp. 2C. states, "All utilities shall furnish any additional documentation necessary to support findings of the study."

## 2. Salvage Values

In the Company's 2017 Five-Year Depreciation Study, Xcel proposed significant changes to its salvage rates. The Department concluded, and the Commission ultimately agreed, that the proposed changes were reasonable.

The Department reviewed the Company's proposed salvage rates in this instant docket, and notes that there have been no changes in proposed salvage rates from those that were approved in the previous depreciation docket. The Department concludes that the proposed salvage rates are reasonable.

### C. PLANT BALANCES, ADDITIONS, AND RETIREMENTS

Table 2 shows the changes to Xcel's plant balances during 2017. The net effect of additions and retirements during the year is an increase in total plant of approximately \$331 million, the majority of which was incurred in electric transmission, electric distribution, and gas distribution.

**Table 2:**  
**Changes in Primary Plant Balance Accounts**

Primary Plant Assets	Balance 1/1/17	Additions	Retirements	Transfers	Balance 12/31/17
<b>Electric</b>					
Intangible	\$ 115,172,555	\$ 4,697,127	\$ (7,590,460)	\$ -	\$ 112,279,222
Transmission	\$ 3,475,756,328	\$ 146,363,299	\$ (29,897,479)	\$ 997	\$ 3,592,223,145
Distribution (MN)	\$ 3,366,241,940	\$ 142,261,117	\$ (34,520,052)	\$ -	\$ 3,473,983,005
General	\$ 489,399,248	\$ 65,714,330	\$ (9,512,490)	\$ (95,927)	\$ 545,505,161
<b>Gas</b>					
Intangible	\$ 7,490,919	\$ 57,719	\$ (1,109,079)	\$ -	\$ 6,439,559
Transmission	\$ 82,046,292	\$ 4,383,274	\$ (67,314)	\$ -	\$ 86,362,252
Distribution (MN)	\$ 945,185,388	\$ 48,383,535	\$ (7,332,697)	\$ -	\$ 986,236,226
General	\$ 49,235,406	\$ 3,557,966	\$ (3,432,751)	\$ -	\$ 49,360,621
<b>Common</b>					
Intangible	\$ 378,820,150	\$ 113,715,066	\$ (122,487,905)	\$ -	\$ 370,047,311
General	\$ 321,868,061	\$ 38,894,171	\$ (20,898,318)	\$ -	\$ 339,863,914
<b>Total</b>	<b>\$ 9,231,216,287</b>	<b>\$ 568,027,604</b>	<b>\$ (236,848,545)</b>	<b>\$ (94,930)</b>	<b>\$ 9,562,300,416</b>

Source: 2018 Annual Depreciation Filing, Schedule D.

*D. FUTURE ADDITIONS AND RETIREMENTS*

Minnesota Rules, part 7825.0700, subpart 2, B. states that each utility shall disclose a list of any major future additions or retirements to the plant accounts that the utility believes may have a material effect on the current certification results.

It appears that Xcel did not include this information in its Petition. The Department requests that the Company provide this discussion in its Reply Comments.

*E. SUPPLEMENTAL COMMENTS TO GUIC RIDER DOCKET*

In Xcel's 2017 depreciation filing, the Commission directed its Staff to prepare and issue a notice for supplemental comments in Xcel's pending 2018 GUIC proceeding, in Docket No. G002/M-17-787, that required Xcel to address the gas utility's \$6.8 million decrease in depreciation expense and the appropriateness of using a true-up or some other kind of adjustment in the GUIC rider to reflect the decrease in depreciation expense.

Xcel submitted its comments on May 29, 2018, stating that the Commission should not address or incorporate the \$6.8 million decrease in overall depreciation expense in the GUIC rider. Xcel argued that doing so would be single-issue ratemaking, since the vast majority of the decrease in depreciation expense was not related to GUIC-dedicated projects. The Company also argued that incorporating the decrease in expense would break with the Commission's long-standing practice of evaluating depreciation expense changes to rates in utilities' rate cases.

On July 3, 2018, the Department filed comments agreeing with Xcel that the GUIC rider should not incorporate the decrease to non-GUIC projects' depreciation expense, because doing so would fragment non-GUIC asset recovery, would be single-issue ratemaking, and appeared to extend beyond the scope of the GUIC statute.

The GUIC docket has not yet been scheduled for a Commission agenda meeting. However, should the Commission make a similar determination in this proceeding as was made in the 2017 depreciation proceeding, the Department would continue to recommend that Xcel's GUIC Rider not be used to recognize depreciation expense changes for non-GUIC-dedicated projects.

**III. RECOMMENDATIONS**

The Department requests that Xcel provide a list of any major future additions or retirements to the plant accounts that the Company believes may have a material effect on the current certification results, as required by Minnesota Rules, part 7825.0700, subpart 2, B.

Based on its review of Xcel's 2018 Depreciation Study, the Department recommends that, pending submission of further information regarding future additions and retirements, the Commission:

- **Approve** Xcel's proposed depreciation lives and rates in the 2018 Depreciation Study, effective January 1, 2019;
- **Require** Xcel to file its next remaining life depreciation petition by July 31, 2019;
- **Require** Xcel to file a comprehensive five-year depreciation study for its transmission, distribution, and general accounts by July 31, 2022; and
- **Require** Xcel to return the net decrease in electric utility depreciation expense of \$707,421 to ratepayers in the 2019 capital true-up filing in Docket No. E002/GR-15-826.

Additionally, the Department requests that, in future filings, Xcel provide a current-versus-proposed comparison of the average remaining lives in its next annual filing.

/ja

## **CERTIFICATE OF SERVICE**

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

**Minnesota Department of Commerce  
Comments**

**Docket No. E,G002/D-18-523**

**Dated this 6<sup>th</sup> day of September 2018**

**/s/Sharon Ferguson**



First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
David	Aafedt	daafedt@winthrop.com	Winthrop & Weinstine, P.A.	Suite 3500, 225 South Sixth Street  Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_18-523_D-18-523
Christopher	Anderson	canderson@allete.com	Minnesota Power	30 W Superior St  Duluth, MN 558022191	Electronic Service	No	OFF_SL_18-523_D-18-523
Alison C	Archer	aarcher@misoenergy.org	MISO	2985 Ames Crossing Rd  Eagan, MN 55121	Electronic Service	No	OFF_SL_18-523_D-18-523
Ryan	Barlow	Ryan.Barlow@ag.state.mn.us	Office of the Attorney General-RUD	445 Minnesota Street Bremer Tower, Suite 1400 St. Paul, Minnesota 55101	Electronic Service	No	OFF_SL_18-523_D-18-523
James J.	Bertrand	james.bertrand@stinson.com	Stinson Leonard Street LLP	50 S 6th St Ste 2600  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_18-523_D-18-523
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_18-523_D-18-523
James	Canaday	james.canaday@ag.state.mn.us	Office of the Attorney General-RUD	Suite 1400 445 Minnesota St. St. Paul, MN 55101	Electronic Service	No	OFF_SL_18-523_D-18-523
Jeanne	Cochran	Jeanne.Cochran@state.mn.us	Office of Administrative Hearings	P.O. Box 64620  St. Paul, MN 55164-0620	Electronic Service	No	OFF_SL_18-523_D-18-523
John	Coffman	john@johncoffman.net	AARP	871 Tuxedo Blvd.  St, Louis, MO 63119-2044	Electronic Service	No	OFF_SL_18-523_D-18-523
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1800  St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_18-523_D-18-523

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Riley	Conlin	riley.conlin@stoel.com	Steel Rives LLP	33 S. 6th Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_18-523_D-18-523
Corey	Conover	corey.conover@minneapolismn.gov	Minneapolis City Attorney	350 S. Fifth Street City Hall, Room 210 Minneapolis, MN 554022453	Electronic Service	No	OFF_SL_18-523_D-18-523
George	Crocker	gwillc@nawo.org	North American Water Office	PO Box 174  Lake Elmo, MN 55042	Electronic Service	No	OFF_SL_18-523_D-18-523
Carl	Cronin	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7  Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_18-523_D-18-523
Joseph	Dammel	joseph.dammel@ag.state.mn.us	Office of the Attorney General-RUD	Bremer Tower, Suite 1400 445 Minnesota Street St. Paul, MN 55101-2131	Electronic Service	No	OFF_SL_18-523_D-18-523
Ian	Dobson	residential.utilities@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_18-523_D-18-523
John	Farrell	jfarrell@ilsr.org	Institute for Local Self-Reliance	1313 5th St SE #303  Minneapolis, MN 55414	Electronic Service	No	OFF_SL_18-523_D-18-523
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 280  Saint Paul, MN 551012198	Electronic Service	No	OFF_SL_18-523_D-18-523
Stephen	Fogel	Stephen.E.Fogel@XcelEnergy.com	Xcel Energy Services, Inc.	816 Congress Ave, Suite 1650  Austin, TX 78701	Electronic Service	No	OFF_SL_18-523_D-18-523
Edward	Garvey	edward.garvey@AESLconsulting.com	AESL Consulting	32 Lawton St  Saint Paul, MN 55102-2617	Electronic Service	No	OFF_SL_18-523_D-18-523

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Janet	Gonzalez	Janet.gonzalez@state.mn.us	Public Utilities Commission	Suite 350 121 7th Place East St. Paul, MN 55101	Electronic Service	No	OFF_SL_18-523_D-18-523
Todd J.	Guerrero	todd.guerrero@kutakrock.com	Kutak Rock LLP	Suite 1750 220 South Sixth Street Minneapolis, MN 554021425	Electronic Service	No	OFF_SL_18-523_D-18-523
Kimberly	Hellwig	kimberly.hellwig@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_18-523_D-18-523
Annete	Henkel	mui@mutilityinvestors.org	Minnesota Utility Investors	413 Wacouta Street #230 St. Paul, MN 55101	Electronic Service	No	OFF_SL_18-523_D-18-523
Michael	Hoppe	il23@mtn.org	Local Union 23, I.B.E.W.	932 Payne Avenue  St. Paul, MN 55130	Electronic Service	No	OFF_SL_18-523_D-18-523
Alan	Jenkins	aj@jenkinsatlaw.com	Jenkins at Law	2265 Roswell Road Suite 100 Marietta, GA 30062	Electronic Service	No	OFF_SL_18-523_D-18-523
Linda	Jensen	linda.s.jensen@ag.state.mn.us	Office of the Attorney General-DOC	1800 BRM Tower 445 Minnesota Street  St. Paul, MN 551012134	Electronic Service	No	OFF_SL_18-523_D-18-523
Richard	Johnson	Rick.Johnson@lawmoss.com	Moss & Barnett	150 S. 5th Street Suite 1200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_18-523_D-18-523
Sarah	Johnson Phillips	sarah.phillips@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_18-523_D-18-523

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Mark J.	Kaufman	mkaufman@ibewlocal949.org	IBEW Local Union 949	12908 Nicollet Avenue South  Burnsville, MN 55337	Electronic Service	No	OFF_SL_18-523_D-18-523
Thomas	Koehler	TGK@IBEW160.org	Local Union #160, IBEW	2909 Anthony Ln  St Anthony Village, MN 55418-3238	Electronic Service	No	OFF_SL_18-523_D-18-523
Michael	Krikava	mkrikava@briggs.com	Briggs And Morgan, P.A.	2200 IDS Center 80 S 8th St Minneapolis, MN 55402	Electronic Service	No	OFF_SL_18-523_D-18-523
Douglas	Larson	dlarson@dakotaelectric.com	Dakota Electric Association	4300 220th St W  Farmington, MN 55024	Electronic Service	No	OFF_SL_18-523_D-18-523
Peder	Larson	plarson@larkinhoffman.com	Larkin Hoffman Daly & Lindgren, Ltd.	8300 Norman Center Drive Suite 1000 Bloomington, MN 55437	Electronic Service	No	OFF_SL_18-523_D-18-523
Eric	Lipman	eric.lipman@state.mn.us	Office of Administrative Hearings	PO Box 64620  St. Paul, MN 551640620	Electronic Service	No	OFF_SL_18-523_D-18-523
Ryan	Long	ryan.j.long@xcelenergy.com	Xcel Energy	414 Nicollet Mall 401 8th Floor Minneapolis, MN 55401	Electronic Service	No	OFF_SL_18-523_D-18-523
Peter	Madsen	peter.madsen@ag.state.mn.us	Office of the Attorney General-DOC	Bremer Tower, Suite 1800 445 Minnesota Street St. Paul, Minnesota 55101	Electronic Service	No	OFF_SL_18-523_D-18-523
Kavita	Maini	kmainsi@wi.rr.com	KM Energy Consulting LLC	961 N Lost Woods Rd  Oconomowoc, WI 53066	Electronic Service	No	OFF_SL_18-523_D-18-523
Pam	Marshall	pam@energycents.org	Energy CENTS Coalition	823 7th St E  St. Paul, MN 55106	Electronic Service	No	OFF_SL_18-523_D-18-523

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Joseph	Meyer	joseph.meyer@ag.state.mn.us	Office of the Attorney General-RUD	Bremer Tower, Suite 1400 445 Minnesota Street St Paul, MN 55101-2131	Electronic Service	No	OFF_SL_18-523_D-18-523
David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St  Duluth, MN 558022093	Electronic Service	No	OFF_SL_18-523_D-18-523
Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP	33 South Sixth St Ste 4200  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_18-523_D-18-523
David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency	220 South Sixth Street Suite 1300 Minneapolis, Minnesota 55402	Electronic Service	No	OFF_SL_18-523_D-18-523
Carol A.	Overland	overland@legalelectric.org	Legalelectric - Overland Law Office	1110 West Avenue  Red Wing, MN 55066	Electronic Service	No	OFF_SL_18-523_D-18-523
Jeff	Oxley	jeff.oxley@state.mn.us	Office of Administrative Hearings	600 North Robert Street  St. Paul, MN 55101	Electronic Service	No	OFF_SL_18-523_D-18-523
Kevin	Reuther	kreuther@mncenter.org	MN Center for Environmental Advocacy	26 E Exchange St, Ste 206  St. Paul, MN 551011667	Electronic Service	No	OFF_SL_18-523_D-18-523
Richard	Savelkoul	rsavelkoul@martinsquires.com	Martin & Squires, P.A.	332 Minnesota Street Ste W2750  St. Paul, MN 55101	Electronic Service	No	OFF_SL_18-523_D-18-523
Zeviel	Simpser	zsimpser@briggs.com	Briggs and Morgan PA	2200 IDS Center80 South Eighth Street  Minneapolis, MN 554022157	Electronic Service	No	OFF_SL_18-523_D-18-523

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.	76 W Kellogg Blvd  St. Paul, MN 55102	Electronic Service	No	OFF_SL_18-523_D-18-523
Byron E.	Starns	byron.starns@stinson.com	Stinson Leonard Street LLP	50 S 6th St Ste 2600  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_18-523_D-18-523
James M.	Strommen	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered	470 U.S. Bank Plaza 200 South Sixth Street Minneapolis, MN 55402	Electronic Service	No	OFF_SL_18-523_D-18-523
Eric	Swanson	eswanson@winthrop.com	Winthrop & Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_18-523_D-18-523
Thomas	Tynes	ttynes@energyfreedomcoalition.com	Energy Freedom Coalition of America	101 Constitution Ave NW Ste 525 East  Washington, DC 20001	Electronic Service	No	OFF_SL_18-523_D-18-523
Lisa	Veith	lisa.veith@ci.stpaul.mn.us	City of St. Paul	400 City Hall and Courthouse 15 West Kellogg Blvd. St. Paul, MN 55102	Electronic Service	No	OFF_SL_18-523_D-18-523
Samantha	Williams	swilliams@nrdc.org	Natural Resources Defense Council	20 N. Wacker Drive Ste 1600 Chicago, IL 60606	Electronic Service	No	OFF_SL_18-523_D-18-523
Joseph	Windler	jwindler@winthrop.com	Winthrop & Weinstine	225 South Sixth Street, Suite 3500  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_18-523_D-18-523
Cam	Winton	cwinton@mnchamber.com	Minnesota Chamber of Commerce	400 Robert Street North Suite 1500 St. Paul, Minnesota 55101	Electronic Service	No	OFF_SL_18-523_D-18-523

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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_18-523_D-18-523
Patrick	Zomer	Patrick.Zomer@lawmoss.com	Moss & Barnett a Professional Association	150 S. 5th Street, #1200  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_18-523_D-18-523