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February 7, 2019

VIA ELECTRONIC FILING

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

Re: Minnesota Energy Resources Corporation's Compliance Filing

In the Matter of the Petition of Minnesota Energy Resources Corporation for Approval of a Gas Utility Infrastructure Cost Rider Docket No. G011/M-18-281

Dear Mr. Wolf:

On February 5, 2019, the Minnesota Public Utilities Commission (the "Commission") issued an Order Approving Gas Utility Infrastructure Cost Rider with Modifications and Requiring Compliance Filing ("Order") in the above-referenced docket, authorizing Minnesota Energy Resources Corporation ("MERC" or the "Company") to establish a gas utility infrastructure cost ("GUIC") rider and begin cost recovery in 2019 of the following costs:

- Approximately \$5.3 million in capital investments to relocate natural gas facilities for public works and right-of-way projects;
- Approximately \$7 million in capital costs to replace obsolete materials;
- Approximately \$2 million in operations and maintenance ("O&M") costs for its stop-valve survey; and
- Approximately \$1 million in O&M costs for its sewer cross-bore survey.

Ordering paragraph 5 of the Commission's Order requires that MERC submit a compliance filing within 10 days that includes:

- Revised tariff language;
- A calculation of the authorized GUIC revenue requirement;
- A new GUIC rider rate factor;
- A new proposed effective date for the rider and plan for implementing the new rate factor; and

• A revised customer bill message and bill insert explaining the change in rates.

MERC submits this Compliance Filing in accordance with the Commission's Order.

Revenue Requirement and Rate Factor Schedules

A schedule showing the authorized GUIC revenue requirement and GUIC rate factor calculation is included as Attachment A to this Compliance Filing. In accordance with the Commission's Order, MERC has calculated the revenue requirement based on the approved forecasted GUIC-eligible costs and rate of return of 6.6971%.

Also in accordance with the Commission's Order, MERC has calculated a per-therm GUIC surcharge of \$0.00413 applicable to all customers based on 12 months of sales. Given the timing of the Commission's Order, MERC projects that the GUIC surcharge will only be in effect for eight months in 2019 (May 1, 2019, through December 31, 2019), while the surcharge is calculated based on a full year of sales. As a result, MERC will most likely not recover the actual 2019 revenue requirement in 2019. Any under-recovery of 2019 GUIC costs would be addressed in a future rider adjustment.

Tariff Sheets

Tariff sheets reflecting the Commission's decisions in its Order and the \$0.00413 per therm GUIC rider rate for 2019 are included as Attachment B to this Compliance Filing. As this is the first year MERC has received approval for implementation of a GUIC rider, these tariff sheets are new.

Effective Date and Implementation Plan

The Commission's Order provides that MERC shall submit a compliance filing within 10 days and authorizes comments on that compliance filing within 10 days thereafter. MERC expects the Commission will schedule this matter for final approval and implementation of MERC's 2019 GUIC rider surcharge after parties submit comments on this Compliance Filing. Additionally, the Company will require lead-time to print customer bill inserts upon final approval to implement the GUIC rider surcharge. As a result, the Company proposes that the 2019 GUIC rider rate of \$0.00413 per therm be effective on all customer bills on and after May 1, 2019. Given the Commission's decision to require the GUIC rider rate factor to be uniform

¹ MERC provides additional discussion regarding the proposed effective date of the GUIC rider surcharge below.

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across all customer classes and based on 12 months of sales, the date of implementation will not impact the per-therm charge calculation.

MERC's plan for implementation of the GUIC surcharge rate is to apply the pertherm charge to all customer bills based on natural gas sales. MERC will establish a tracker to track actual revenues from the GUIC rider surcharge based on customer bills as well as actual GUIC expenditures in 2019, as authorized by the Commission. In accordance with the Commission's Order, no carrying charges will be applied to the tracker balance.

As noted above, the Commission's decision to implement the rider rate factor based on a full 12 months of sales in order to help smooth the increase to customer rates as a result of the new rider will mean that MERC will most likely not recover the full amount of actual GUIC-eligible costs incurred in 2019. Consistent with the Commission's decision, any unrecovered revenue requirement will be tracked for recovery in a future GUIC rider true-up calculation.

Additionally, in the event that the Commission does not approve implementation of MERC's 2020 GUIC rider rates (or interim rates in the event MERC files a 2020 test year rate case), on January 1, 2020, MERC proposes that the \$0.00413 per therm GUIC rider surcharge continue to be applied until the Commission authorizes implementation of new rates in order to ensure MERC is able to recover its annual revenue requirements on the approved GUIC-eligible projects. Actual costs and recoveries will be tracked through the tracker mechanism to ensure any over-recoveries are refunded or that any under-recoveries are collected in a future true-up adjustment.

Customer Notices

A customer bill insert explaining the change in rates is included as Attachment C to this Compliance Filing. In accordance with the Commission's Order, MERC has worked with the Commission's Consumer Affairs Office ("CAO") and Commission staff to develop the proposed bill insert, which MERC proposes to include with the first bills incorporating the GUIC rider rate factor. Additionally, MERC proposes to include the following bill message on the first customer bill containing the GUIC rider surcharge, which MERC has also worked with the CAO and Commission staff to develop:

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Effective May 1, 2019, a GUIC (Gas Utility Infrastructure Cost) surcharge of \$0.00413 per therm has been included on your bill. The GUIC Surcharge is authorized under Minn. Stat. § 216B.1635 to recover out-of-test-year infrastructure investments mandated by federal or state agencies associated with our pipeline integrity programs and public right-of-way projects. Rates are based on a standard year's revenues and expenses – called a "test year." The GUIC Surcharge will appear as a line item on your bill labeled "Infrastructure Rider."

Please contact me at (920) 433-2926 if you have any questions regarding the information in this filing. Thank you for your attention to this matter.

Sincerely,

/s/ Seth DeMerritt

Seth DeMerritt Senior Project Specialist Minnesota Energy Resources Corporation

Enclosures cc: Service List

Attachment A 2019 Revenue Requirement and GUIC Rider Surcharge

Minnesota Energy Resources Corporation 2019 Gas Utility Infrastructure Cost (GUIC) Rider Calculation

Minnesota Energy Resources Corporation
Docket No. G011/M-18-281
Attachment A
2019 Revenue Requirement
and GUIC Surcharge Calculation
Page 1 of 4

			2018 Rate	2019	Forecasted 2019 GUIC
Line	Description	Reference	Case	Forecast	Rider
1	Expenses	O&M, Depreciation Expense, and Property Taxes	-	3,133,090	3,133,090
3	Rate Base	13-Month Average Net Plant Value	-	5,250,459	5,250,459
4	DFIT Proration Adjustment	DFIT Proration Adjustment		2,581	2,581
5	Adjusted Rate Base	13-Month Average Net Plant Value		5,253,039	5,253,039
6	Rate of Return	Commission Authorized 2018 Rate Case			6.6971%
7	Gross Revenue Conversion Factor (1)	Commission Authorized 2018 Rate Case			1.402
8	Earnings on Rate Base				
9	Return on Rate Base	Line 3 x Line 4 x Line 5			493,225
11	Total Revenue Requirement	Line 1 + Line 7			3,626,315
13	Total Therm Sales (January 1, 2019-December 31, 2019)				877,001,389
15	Per therm Charge	Line 9 / Line 11			\$ 0.00413

Note (1): Gross revenue conversion factor is based on the Commission-authorized 2018 factor.

Minnesota Energy Resources Corporation GUIC Rider Estimate for 2019

Road Projects - based upon most recent 3-year average spending

2015 2016 2017 Average	Mains Services \$ 4,215,270 \$ 358,132 \$ 3,922,339 \$ 857,348 \$ 4,802,435 \$ 1,262,009 \$ 4,313,348 \$ 825,830	\$\ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \	\$ 6,257,343	Monthly Spending Estimate Q-4605-000004: ROAD PROJECTS Monthly capital spend - Road Projects	Jan 0.00 -			Apr 13.00% 693,440	May J 17.00% 906,806	un Ji 20.00% 1,066,831	ul A 10.00% 533,416	14.00% 746,782	Sep (7.00% 373,391	Oct N 8.00% 426,732	lov De 9.00% 480,074	2.00%	Total 100.00% \$ 5,334,155
DIMP/TIMP - based upon most recent 3-year average spending Mains Services Stations Total Monthly Spending Estimate Jan Feb Mar Apr May Jun Jul Aug Sep Oct Nov Dec Total																	
2015	\$ 4,882,893 \$ 603,220	\$ 1,578,432	\$ 7,064,545	Q-4605-000002: GAS SERVICES-REPLACEMENT	0.14	% 0.17%	0.49%	5.61%	12.40%	16.00%	13.26%	12.36%	14.10%	12.62%	9.20%	3.65%	100.00%
2016 2017	\$ 2,820,299 \$ 925,378 \$ 2,805,922 \$ 3,189,772	\$ 2,868,337		Monthly capital spend - DIMP Projects	9.98	3 12,122	34.940	400,031	884,204	1,140,908	945,528	881,351	1,005,425	899,891	656,022	260,270	7,130,675
Average	\$ 3,503,038 \$ 1,572,790			Worthly capital spellu - blivir Projects	5,50	12,122	34,940	400,031	864,204	1,140,908	943,326	001,331	1,005,425	099,091	656,022	260,270	7,130,073
Estimated 2019 GUI	C Capital Investment for GUIC	Rider	\$ 12,464,831	Total DIMP + Road Projects	- 9,983	12,122	34,940	1,093,471	1,791,010	2,207,739	1,478,943	1,628,133	1,378,816	1,326,624	1,136,096	366,953	12,464,831

Minnesota Energy Resources Corporation GUIC Rider Estimate for 2019

Road Projects - O&M Expense															
		Monthly Spending Estimate	Jan	Feb	Mar /	Apr	May J	un Ji	ul A	Aug S	ep Od	t No	v De	c ·	Γotal
		Q-4605-000004: ROAD PROJECTS	0.00%	0.00%	0.00%	13.00%	17.00%	20.00%	10.00%	14.00%	7.00%	8.00%	9.00%	2.00%	100.00%
2019	\$ -	Monthly O&M spend - Road Projects	-	-		-		-		-	-	-	-	-	-
DIMP Projects - O&M Expense															
		Monthly Spending Estimate	Jan	Feb	Mar /	Apr	May J	un Ji	ا ال	Aug S	ep Oc	t No	v De	с .	Total
2019 Meter set survey for stop valves	\$ 2,000,000	Q-4605-000002: GAS SERVICES-REPLACEMENT	0.14%	0.17%	0.49%	5.61%	12.40%	16.00%	13.26%	12.36%	14.10%	12.62%	9.20%	3.65%	100.00%
2019 Sewer line lateral inspection program	\$ 1,000,000	Monthly O&M spend - DIMP Projects	4,200	5,100	14,700	168,300	372,000	480,000	397,800	370,800	423,000	378,600	276,000	109,500	3,000,000
	\$ 3,000,000														
Estimated 2019 GUIC O&M Expense for GUIC Rider	\$ 3.000.000	Total DIMP + Road Projects	- 4,200	5,100	14,700	168,300	372,000	480,000	397,800	370,800	423,000	378,600	276,000	109,500	3,000,000

GUIC Rider Road Projects and Replacement Services Revenue Requirement

	Month	Construction Expenditures	CWIP	Plant	Accumulated Depreciation	Accumulated Deferred Tax	Rate Base	13-Month Average	13 Mo Avg Prorated DFIT	Revenue Requirement	AFUDC	Depreciation Expense	Property Tax	O&M	Expenses	Annual Expenses
2018	Dec-18		-	-	-	-	-									
2019	Jan-19	9,983	-	9,983	(22)	(7,987)	1,975					22	-	4,200	4,222	
2019	Feb-19	12,122	-	22,105	(71)	(15,973)	6,062					49	-	5,100	5,149	
2019	Mar-19	34,940	-	57,045	(196)	(23,960)	32,890					125	-	14,700	14,825	
2019	Apr-19	1,093,471	-	1,150,516	(2,301)	(31,946)	1,116,269					2,105	-	168,300	170,405	
2019	May-19	1,791,010	-	2,941,527	(7,789)	(39,933)	2,893,805					5,488	-	372,000	377,488	
2019	Jun-19	2,207,739	-	5,149,266	(17,477)	(47,919)	5,083,869					9,689	-	480,000	489,689	
2019	Jul-19	1,478,943	-	6,628,209	(30,091)	(55,906)	6,542,213					12,613	-	397,800	410,413	
2019	Aug-19	1,628,133	-	8,256,342	(45,826)	(63,892)	8,146,624					15,735	-	370,800	386,535	
2019	Sep-19	1,378,816	-	9,635,158	(64,364)	(71,879)	9,498,916					18,538	-	423,000	441,538	
2019	Oct-19	1,326,624	-	10,961,782	(85,556)	(79,865)	10,796,361					21,193	-	378,600	399,793	
2019	Nov-19	1,136,096	-	12,097,878	(108,952)	(87,852)	11,901,074					23,396	-	276,000	299,396	
2019	Dec-19	366,953	-	12,464,831	(133,090)	(95,838)	12,235,903	5,250,459	2,581	493,225		24,138	-	109,500	133,638	3,133,090
		12,464,831														

_	Forecasted Month End Federal ADIT	Forecasted Month End State ADIT	Forecasted Month End Balance	Forecasted Federal ADIT Change	Days to Prorate	Days in Calendar Year	Prorated Federal DIFT Activity
12/21/2010					365	365	
12/31/2018	(F 0F4)	(2.426)	(7.007)	/F 0F1\			- /F 270\
1/31/2019	(5,851)	* * * *	(7,987)	(5,851)	335		(5,370)
2/28/2019	(11,702)		(15,974)	(5,851)	307		(4,921)
3/31/2019	(17,553)	(6,408)	(23,961)	(5,851)	276	365	(4,424)
4/30/2019	(23,404)	(8,544)	(31,948)	(5,851)	246	365	(3,943)
5/31/2019	(29,255)	(10,680)	(39,935)	(5,851)	215	365	(3,446)
6/30/2019	(35,106)	(12,816)	(47,922)	(5,851)	185	365	(2,966)
7/31/2019	(40,957)	(14,952)	(55,909)	(5,851)	154	365	(2,469)
8/31/2019	(46,808)	(17,088)	(63,896)	(5,851)	123	365	(1,972)
9/30/2019	(52,659)	(19,224)	(71,883)	(5,851)	93	365	(1,491)
10/31/2019	(58,510)	(21,360)	(79,870)	(5,851)	62	365	(994)
11/30/2019	(64,361)	(23,496)	(87,857)	(5,851)	32	365	(513)
12/31/2019	(70,212)	(25,626)	(95,838)	(5,851)	1	365	(16)
13 Mo-Ave	(35,106)	(12,816)	(47,922)		Tota	l Prorated Balance	(32,525)
Proration Adj			2,581			-	
Prorated Balan	ce	-	(45,341)	•	Proration Adjustm	nent	2,581

Attachment B GUIC Rider Tariff Sheets



GAS UTILITY INFRASTRUCTURE COST RIDER

Original Sheet No. 7.20

1. APPLICABILITY

Applicable to bills for natural gas service provided under all utility rate schedules as approved by the Minnesota Public Utilities Commission (MPUC).

2. RIDER

The Gas Utility Infrastructure Cost (GUIC) rider statute (Minn. Stat. § 216B.1635) permits a public utility to petition the MPUC outside of a general rate case for a rider to be billed to all of the utility's customers, including transport customers, to recover the revenue deficiency from projects not already included in utility rates that have been incurred for:

- A. replacement of natural gas facilities located in the public right-of-way required by the construction or improvement of a highway, road, street, public building, or other public work by or on behalf of the United States, the state of Minnesota, or a political subdivision; and
- B. replacement or modification of existing natural gas facilities, including surveys, assessments, reassessment, and other work necessary to determine the need for replacement or modification of existing infrastructure that is required by a federal or state agency.

3. RATE

The GUIC Rider rate for any customer class will be the MPUC-approved rate for that customer class. Such GUIC Rider rates may be volumetric, a flat fee, or some other form of approved recovery.

4. TERM

The GUIC Rider rate will be established for each customer group and be based on the annual revenue requirements for costs associated with forecasted natural gas infrastructure projects eligible for recovery under Minnesota Statute Sections 216B.1635 that are determined by the Commission to be eligible for recovery under this GUIC Rider.

The Company will file a GUIC Annual Report each April 1, which will include a reconciliation of the previous full calendar year's GUIC Tracker Account balance, if applicable, as well as support for any request to change the GUIC Rider Rate for a subsequent calendar year. (For example, the year-end 2019 GUIC Rider Tracker Account balance will be applied as a true-up adjustment to the 2021 GUIC Rider rate.) The GUIC Rider rate will be adjusted to reflect new Recoverable GUIC Costs as well as the amortization of the prior year's GUIC Tracker balance as approved by the Commission.

Effective Date: May 1, 2019

Date Filed: February 7, 2019 Docket No.: G011/M-18-281 Submitted By: Theodore Eidukas

Vice President - Regulatory Affairs



GAS UTILITY INFRASTRUCTURE COST RIDER

(Continued)

Original Sheet No. 7.21

5. <u>DEFINITIONS</u>

- GUIC Tracker: An accounting process used to accumulate any difference between the actual revenue requirement impact of Recoverable GUIC Costs and the actual revenues recovered through the GUIC Rider.
- GUIC Rider Reconciliation: The GUIC Factor for each customer group may be adjusted annually with approval of the MPUC. The Company will file a GUIC Annual Report on or before April 1, which will include a reconciliation of the previous full calendar year's GUIC Tracker Account balance, if applicable, as well as support for any request to change the GUIC Factor for the subsequent calendar year.
- Qualifying Projects: Projects eligible for recovery via the GUIC Rider under Minn. Stat. § 216B.1635 include:
 - i. replacement of natural gas facilities located in the public right-of-way required by the construction or improvement of a highway, road, street, public building, or other public work by or on behalf of the United States, the state of Minnesota, or a political subdivision; and
 - ii. replacement or modification of existing natural gas facilities, including surveys, assessments, reassessment, and other work necessary to determine the need for replacement or modification of existing infrastructure that is required by a federal or state agency.
- Recoverable GUIC Costs: The revenue requirement related to Qualifying Projects not already reflected in rates. The annual revenue requirement for costs associated with the Qualifying Projects includes the currently authorized rate of return on capital investment, incremental income taxes, incremental property taxes, incremental depreciation expense, and any incremental operation and maintenance costs relative to the Qualifying Project(s). A standard model will be used to calculate the revenue requirement related to Qualifying Project(s) for the filing period.

6. **GUIC RIDER RATES**

A. Currently Authorized GUIC Rider Rate

A separate GUIC Rate may be calculated for each customer class or the same rate may be applied across all or a portion of customer classes, as approved by the MPUC. The GUIC rate shall be calculated to recover the Recoverable GUIC Costs over the period approved by the MPUC.

The GUIC Rate effective May 1, 2019 shall be \$0.00413 per therm for all customer classes.

B. Adjustment to GUIC Tracker Account with Changes in Base Rates

Whenever the Company implements changes in base rates as the result of a final Commission order in a general rate case, the Company shall simultaneously adjust the GUIC Tracker Account to remove all costs that have been included in the approved base rates.

Effective Date: May 1, 2019

Date Filed: February 7, 2019 Docket No.: G011/M-18-281

Vice President - Regulatory Affairs

Attachment C Customer Bill Insert

Important information about your natural gas rates

Gas Utility Infrastructure Cost Rider Surcharge for Minnesota Energy Resources Customers

On Feb. 5, 2019, the Minnesota Public Utilities Commission (MPUC) approved Minnesota Energy Resources' request for a Gas Utility Infrastructure Cost Rider Surcharge. The surcharge applies to all Minnesota Energy Resources customers and is effective May 1, 2019.

Minnesota Statute section 216B.1635 allows utilities to seek rider recovery of costs for the replacement of natural gas facilities required because of road construction or other public work by, or on behalf of, a government agency and for the replacement or modification of existing facilities required by a federal or state agency. This includes surveys, assessments, reassessments and other work necessary to determine the need for replacement or modification of existing infrastructure.

Effective May 1, 2019, a Gas Utility Infrastructure Cost Surcharge of \$0.00413 per therm will be included on your bill for the recovery of natural gas utility infrastructure costs related to right-of-way relocation projects and distribution integrity work that will start in 2019. The MPUC has approved recovery related to the following planned projects:

- The relocation of natural gas facilities for public works and right-of-way projects, stimated to be approximately \$5.3 million in costs for 2019.
- The replacement of obsolete materials including Aldyl-A pipe, a material identified as having an increased risk of cracking and failure; X-trube piping, a less durablematerial that cannot be repaired; and



copper piping, found in older material that cannot be repaired; and copper piping, found in older installations where the lines and fittings have been prone to leaks and failures, estimated to be approximately \$7 million in costs for 2019.

- The survey and assessment of customer meter set stop valves to assess the risk of possible faulty stop valves, estimated to be approximately \$2 million in spending in 2019.
- The investigation of possible sewer cross bores, which occur when a natural gas line installed using trenchless installation methods intersects with a sewer line, threatening the integrity of both the sewer and the natural gas line, estimated to be approximately \$1 million in spending in 2019.

Recovery of these costs is subject to future adjustments based on actual expenditures and amounts collected through the surcharge during the applicable surcharge period.

Minnesota Energy Resources is dedicated to operating a safe and reliable natural gas system for our customers and the general public. It is of crucial importance that we dedicate investments to assess the integrity of our system and to proactively repair and replace problematic equipment and materials. Our integrity projects are aimed at updating our natural gas infrastructure to reduce the likelihood of leaks or incidents within the communities we serve.

The following chart shows the estimated monthly rate impact based on monthly natural gas usage. For reference, an average Residential customer uses approximately 72 therms per month.

		Averaç	ge Monthly	Avera	ge Annual	
Monthly Therm Usage	Rider	Bill	Impact	Bill Impact		
50	\$ 0.00413	\$	0.21	\$	2.48	
100	\$ 0.00413	\$	0.41	\$	4.96	
150	\$ 0.00413	\$	0.62	\$	7.43	
200	\$ 0.00413	\$	0.83	\$	9.91	
500	\$ 0.00413	\$	2.07	\$	24.78	
1000	\$ 0.00413	\$	4.13	\$	49.56	





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In the Matter of the Petition of Minnesota Energy Resources Corporation for Approval of a Gas Utility Infrastructure Cost Rider Docket No. G011/M-18-281

CERTIFICATE OF SERVICE

I, Kristin M. Stastny, hereby certify that on the 7th day of February, 2019, on behalf of Minnesota Energy Resources Corporation (MERC) I electronically filed a true and correct copy of the enclosed Compliance 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 7th day of February, 2019.

/s/ Kristin M. Stastny
Kristin M. Stastny

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	OFF_SL_18-281_M-18-281
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	Yes	OFF_SL_18-281_M-18-281
Seth	DeMerritt	Seth.DeMerritt@wecenergy group.com	MERC (Holding)	700 North Adams PO Box 19001 Green Bay, WI 543079001	Electronic Service	No	OFF_SL_18-281_M-18-281
lan	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	Yes	OFF_SL_18-281_M-18-281
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_18-281_M-18-281
Daryll	Fuentes	dfuentes@usg.com	USG Corporation	550 W Adams St Chicago, IL 60661	Electronic Service	No	OFF_SL_18-281_M-18-281
Brian	Meloy	brian.meloy@stinson.com	Stinson,Leonard, Street LLP	50 S 6th St Ste 2600 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_18-281_M-18-281
Andrew	Moratzka	andrew.moratzka@stoel.co m	Stoel Rives LLP	33 South Sixth St Ste 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_18-281_M-18-281
Catherine	Phillips	catherine.phillips@we- energies.com	We Energies	231 West Michigan St Milwaukee, WI 53203	Electronic Service	No	OFF_SL_18-281_M-18-281
Colleen	Sipiorski	Colleen.Sipiorski@wecener gygroup.com	Minnesota Energy Resources Corporation	700 North Adams St Green Bay, WI 54307	Electronic Service	No	OFF_SL_18-281_M-18-281

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	OFF_SL_18-281_M-18-281
Eric	Swanson	eswanson@winthrop.com	Winthrop & Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_18-281_M-18-281
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_18-281_M-18-281
Mary	Wolter	mary.wolter@wecenergygr oup.com	Minnesota Energy Resources Corporation (HOLDING)	231 West Michigan St Milwaukee, WI 53203	Electronic Service	No	OFF_SL_18-281_M-18-281