



Minnesota Energy Resources Corporation  
2685 145th Street West  
Rosemount, MN 55068  
www.minnesotaenergyresources.com

May 1, 2019

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 2018 Conservation Improvement Program Tracker Account, Demand-Side Management Financial Incentive, and Conservation Cost Recovery Adjustment Factor**

**Docket No. G011/M-19-\_\_\_\_**

Dear Mr. Wolf:

Enclosed, please find the Petition of Minnesota Energy Resources Corporation ("MERC") for Approval of the 2018 Conservation Improvement Program ("CIP") Tracker Account, Demand-Side Management ("DSM") Financial Incentive, and Conservation Cost Recovery Adjustment factor. Excel versions of Attachment B, the Company's 2018 DSM Financial Incentive and supporting BENCOST analyses, are being filed concurrently.

The Minnesota Public Utilities Commission's 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 Minnesota Department of Commerce, Division of Energy Resources and the Minnesota 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 lists.

Please contact me at (414) 221-2374 if you have any questions regarding this filing.

Sincerely,

/s/ Mary L. Wolter

Mary L. Wolter

Director – Gas Regulatory Planning & Policy

Enclosures  
cc: Service Lists

**STATE OF MINNESOTA  
BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION**

Katie J. Sieben  
Dan Lipschultz  
Valerie Means  
Matthew Schuerger  
John A. Tuma

Chair  
Commissioner  
Commissioner  
Commissioner  
Commissioner

In the Matter of the Petition of Minnesota  
Energy Resources Corporation for Approval  
of the 2018 Conservation Improvement  
Program Tracker Account, Demand-Side  
Management Financial Incentive, and  
Conservation Cost Recovery Adjustment  
Factor

Docket No. G011/M-19-\_\_\_\_

**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, 2018, through December 31, 2018. MERC is also seeking Commission approval of a proposed modified Conservation Cost Recovery Adjustment (“CCRA”) factor. MERC filed its CIP Status Report covering the same period in Docket No. G011/CIP-16-120.02.

**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 Minnesota Department of Commerce, Division of Energy Resources and the Minnesota

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. General Filing Information**

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 145<sup>th</sup> 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, 2019. MERC has calculated the new CCRA factor based on an assumed effective date of January 1, 2020 and assumed 12-month effective period. In the event the Commission acts to approve this filing sooner, a revised CCRA factor could be submitted through a compliance filing.

#### **D. Statute Controlling Schedule for Processing the Filing**

Minnesota Statutes section 216B.16, subdivision 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, subpart 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**



Mary L. Wolter  
Director – Gas Regulatory Planning & Policy  
mary.wolter@wecenergygroup.com  
231 W. Michigan Street  
Milwaukee, WI 53203  
(414) 221-2374

**IV. Description and Purpose of Filing**

**A. Background**

In this Petition, MERC seeks the Commission's approval of its CIP tracker account balances as of December 31, 2018. Additionally, MERC seeks Commission approval of a DSM financial incentive for 2018 in the amount of \$1,892,566. MERC also seeks Commission approval of a CCRA credit to customers of (\$0.00953) per therm, with a proposed effective date of January 1, 2020.

**B. 2018 CIP Tracker Account**

On May 1, 2018, MERC submitted a petition for approval of its 2017 CIP tracker account activity, DSM financial incentive, and revised CCRA in Docket No. G011/M-18-117. Specifically, MERC requested that the Commission approve the Company's 2017 DSM financial incentive of \$1,694,489; approve MERC's 2017 CIP tracker activity; and approve a revised CCRA of \$0.00000 per therm to be effective August 1, 2018. The Commission approved MERC's 2017 CIP tracker activity and DSM incentive by Order dated September 4, 2018, with the revised CCRA effective in the first billing cycle in the next full month after the issue date of the Order.<sup>1</sup>

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<sup>1</sup> *In the Matter of Minn. Energy Res. Corp.'s Conservation Improvement Program Cost Recovery*, Docket No. G011/M-18-117, ORDER (Sept. 4, 2018).

The table below provides a summary of activities in the MERC CIP tracker account in 2018.

**MERC-CIP Tracker 2018 Activity**

Beginning Balance – January 1, 2018	\$(601,530.90)
CIP Expenses – January 1, 2018 – December 31, 2018	\$11,777,435.56
Carrying Charges – January 1, 2018 – December 31, 2018	\$(221,377.14)
DSM Financial Incentive	\$1,694,489.00
CIP Recoveries – January 1, 2018 – December 31, 2018	\$(17,189,366.45)
<b>Ending Balance – December 31, 2018</b>	<b>\$(4,540,349.93)</b>

Attachment A includes MERC's 2018 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 \$1,892,566 for 2018 based on energy savings of 509,758 dekatherms, 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 Next Generation Energy Act ("NGEA") assessments in the amount of \$162,115 from the calculation of net benefits consistent with the Commission's August 5, 2016, Order in Docket No. E,G999/CI-08-133.<sup>2</sup>

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<sup>2</sup> *In the Matter of Comm'n Review of Util. Performance Incentives for Energy Conservation Pursuant to Minn. Stat. § 216B.241, Subd. 2c*, Docket No. E,G999/CI-08-133, ORDER ADOPTING MODIFICATIONS TO SHARED SAVINGS DEMAND-SIDE MANAGEMENT FINANCIAL INCENTIVE PLAN at 26 (Aug. 5, 2016).

## 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.<sup>3</sup>

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 cost-effective 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

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<sup>3</sup> *In the Matter of Comm'n Review of Util. Performance Incentives for Energy Conservation Pursuant to Minn. Stat. § 216B.241, Subd. 2c*, Docket No. E,G999/CI-08-133, ORDER ADOPTING MODIFICATIONS TO SHARED SAVINGS DEMAND-SIDE MANAGEMENT FINANCIAL INCENTIVE PLAN (Aug. 5, 2016).

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 was 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 12.0 percent of net benefits in 2018.

(3) *Whether the plan links the incentive to the utility's performance in achieving cost-effective 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 \$0.00000 was approved by the Commission by Order dated September 4, 2018, in Docket No. G011/M-18-117 and was effective September 1, 2018.

The MERC tracker balance as of January 1, 2019, is an over-recovery of \$4,540,349.93. The estimated MERC CIP tracker balance as of January 1, 2020, based on anticipated expense and collections via the CCRC, is an over-collection of \$6,842,663.38. As a result, MERC proposes to set the CCRA factor to (\$0.00953) effective January 1, 2020, or on the first billing period after the Commission's Order in order to reduce the over-collection balance on the CIP tracker through 2020. As shown in Attachment C, setting the CCRA to (\$0.00953) on January 1, 2020, is projected to collect the CIP tracker over-recovery of (\$4,429,658.56) currently projected as of December 31, 2020.

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 (\$0.00953) 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 refund the difference between the CIP expenses actually recovered through the CCRC and the CIP tracker account balance as of January 2019 over approximately one year. In particular, as shown in Attachment C, setting the CCRA to (\$0.00953) on January 1, 2020, is projected to refund tracker balance of \$(4,429,658.56) projected as of December 31, 2020.

#### **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.<sup>4</sup>

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 2018 with an ending balance of \$(4,540,349.93). Additionally, MERC requests that the Commission approve a consolidated 2018 DSM financial incentive of \$1,892,566. Finally,

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<sup>4</sup> *In the Matter of a Petition by Minn. Energy Res. Corp. for Auth. To Increase Nat. Gas Rates in Minn.*, Docket No. G011/GR-13-617, FINDINGS OF FACT, CONCLUSIONS, AND ORDER at 10 (Oct. 28, 2014).

MERC requests approval to set the CCRA factor to (\$0.00953) per therm effective January 1, 2020.

Dated: May 1, 2019

Respectfully submitted,

BRIGGS AND MORGAN, P.A.

By: /s/ Kristin M. Stastny

Kristin M. Stastny

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Attorney for Minnesota Energy  
Resources Corporation

**STATE OF MINNESOTA  
BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION**

Katie J. Sieben  
Dan Lipschultz  
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Chair  
Commissioner  
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In the Matter of the Petition of Minnesota  
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of the 2018 Conservation Improvement  
Program Tracker Account, Demand-Side  
Management Financial Incentive, and  
Conservation Cost Recovery Adjustment  
Factor

Docket No. G011/M-19-\_\_\_\_

**SUMMARY OF FILING**

Please take notice that on May 1, 2019, Minnesota Energy Resources Corporation submitted to the Minnesota Public Utilities Commission ("Commission") a Petition for Approval of its 2018 Conservation Improvement Program tracker account balance, 2018 Demand-Side Management 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 12/31/2018

	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		(601,530.90)	(2,469,060.84)	(4,628,436.38)	(6,811,620.34)	(8,309,909.87)	(8,431,154.69)	(8,573,469.98)	(8,180,671.33)	(7,456,761.08)	(5,263,786.09)	(4,709,032.20)	(4,639,503.45)	(601,530.90)
														-
2. Expenses		946,150.74	578,168.11	195,145.34	509,025.76	1,227,021.88	528,830.86	986,951.54	1,264,918.49	1,077,245.27	1,166,531.69	1,343,681.35	1,953,764.53	11,777,435.56
3. Recoveries		(2,806,295.65)	(2,723,699.88)	(2,357,955.56)	(1,982,460.12)	(1,323,048.89)	(645,502.67)	(569,684.28)	(518,704.87)	(563,015.15)	(597,692.96)	(1,260,275.72)	(1,841,030.70)	(17,189,366.45)
														-
4. Incentives										1,694,489.00				1,694,489.00
Subtotal Balance														
5. Line 1+2-3+4)		(2,461,675.81)	(4,614,592.61)	(6,791,246.61)	(8,285,054.70)	(8,405,936.88)	(8,547,826.50)	(8,156,202.72)	(7,434,457.70)	(5,248,041.96)	(4,694,947.36)	(4,625,626.57)	(4,526,769.62)	(4,318,972.79)
Monthly Carry Cost **														
6. (Line 5 x .003)		(7,385.03)	(13,843.78)	(20,373.74)	(24,855.16)	(25,217.81)	(25,643.48)	(24,468.61)	(22,303.37)	(15,744.13)	(14,084.84)	(13,876.88)	(13,580.31)	(221,377.14)
														-
Ending Balance														
7 (Line 5+6)	(601,530.90)	(2,469,060.84)	(4,628,436.38)	(6,811,620.34)	(8,309,909.87)	(8,431,154.69)	(8,573,469.98)	(8,180,671.33)	(7,456,761.08)	(5,263,786.09)	(4,709,032.20)	(4,639,503.45)	(4,540,349.93)	(4,540,349.93)

\*\* Carry Cost charge set at 3.60% based on 2018 Rate Case verbal approval:

3.6000% annual rate  
12 months  
0.00300000 monthly rate

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

718009510 Q-4520-000023  
182022065

**Minnesota Energy Resources**  
**CCRC Recovery by Class (in therms)**  
**As of 12/31/2018**

CCRC:	January	February	March	April	May	June	July	August	September	October	November	December	YTD
Gas Residential	36,679,450	34,431,396	29,041,362	23,719,631	13,721,607.00	4,601,136.00	3,459,174	2,523,011	3,704,057	6,822,113	16,579,042	31,351,106	206,633,084
Gas Small C&I	2,912,797	1,132,055	1,185,250	1,088,481	718,891.00	157,498.00	85,183	72,275	72,410	254,119	1,009,566	1,144,471	9,832,996
Gas Large C&I	20,543,503	18,364,716	15,843,137	13,130,501	8,024,427.00	3,357,917.00	3,012,684	2,371,547	2,411,200	4,821,432	10,345,435	15,478,828	117,705,327
Gas Large C&I Int.	5,019,443	4,718,656	4,260,891	3,521,636	2,878,685.00	1,400,291.00	1,106,286	1,029,670	1,407,637	1,630,011	4,863,628	5,294,012	37,130,846
Transport of Gas	8,949,967	9,887,958	8,959,168	8,387,900	7,923,927.00	6,714,054.00	6,660,709	7,046,133	7,355,137	6,790,983	9,545,116	9,100,987	97,322,039
Total Therms	74,105,160	68,534,782	59,289,808	49,848,149	33,267,537	16,230,896	14,324,036	13,042,636	14,950,441	20,318,658	42,342,787	62,369,403	468,624,292
CCRC rate *	0.02953	0.02953	0.02953	0.02953	0.02953	0.02953	0.02953	0.02953	0.02953	0.02953	0.02953	0.02953	0.02953
CCRC Recovery	\$ 2,188,325.36	\$ 2,023,832.10	\$ 1,750,828.03	\$ 1,472,015.84	\$ 982,390.37	\$ 479,298.36	\$ 422,988.78	\$ 385,149.04	\$ 441,486.52	\$ 600,009.97	\$ 1,250,382.50	\$ 1,841,768.46	\$ 13,838,475.33

\* CCRC Final rate effective Jan 1, 2018

**Minnesota Energy Resources**  
**CCRA Recovery by Class (in therms)**  
**As of 12/31/2018**

CCRA:	January	February	March	April	May	June	July	August	September	October	November	December	YTD
Gas Residential	36,679,095	34,431,563	29,041,354	23,719,556	13,721,505	4,601,130	3,459,168	2,522,954	3,616,342	87,358	1,160	(18,902)	151,862,283
Gas Small C&I	2,912,797	1,132,055	1,185,250	1,088,481	718,891	157,498	85,183	72,275	71,911	10,874	(4,112)	(24,313)	7,406,791
Gas Large C&I	20,543,501	18,364,716	15,843,135	13,130,501	8,024,426	3,357,917	3,014,386	2,371,530	2,407,493	280,822	(9,423)	10,956	87,339,960
Gas Large C&I Int.	5,019,443	4,718,656	4,260,891	3,521,636	2,878,685	1,400,291	1,106,286	1,029,670	1,388,609	(33,644)	(7,238)	(62,821)	25,220,464
Transport of Gas	8,949,967	9,887,959	8,959,168	8,387,900	7,923,927	6,714,054	6,660,709	7,046,132	7,355,137	(129,384)	1,000,000		72,755,568
Total Therms	74,104,802	68,534,948	59,289,798	49,848,074	33,267,434	16,230,890	14,325,732	13,042,561	14,839,492	216,026	980,387	(95,078)	344,585,066
CCRA rate *	0.01024	0.01024	0.01024	0.01024	0.01024	0.01024	0.01024	0.01024	0	0	0	0	0
CCRA Recovery	\$ 617,970.29	\$ 699,867.78	\$ 607,127.53	\$ 510,444.28	\$ 340,658.52	\$ 166,204.31	\$ 146,695.50	\$ 133,555.82	\$ 121,528.63	\$ (2,317.01)	\$ 9,893.22	\$ (737.76)	\$ 3,350,891.12

amount billed through Open C  
less adj for customer bill reversal  
(Sept and Oct)

CCRA = Conservation Cost Recovery Adjustment

Will book Open C Will book Open C  
billed amt (Nov) billed amt (Nov)

\* note: billing rate changed effective 9/1/18. Due to billing cycles amount billed different than manual calculation. Will book amount billed.

# ATTACHMENT B



	A	B	C	D	E	F	G	H
1								
2	Conservation Improvement Program (CIP)  Company: Minnesota Energy Resources Project: TOTAL CIP - 2018			BENEFIT COST FOR GAS CIPS-- Cost-Effectiveness Analysis				
Approved by Minnesota Department of Commerce, January 26, 2006								
6				R				
7	Input Data			Second Year				
8								
9	1) Retail Rate (\$/Dth) =			\$17.22	16) Utility Project Costs			
10	Escalation Rate =			4.00%	16a) Administrative & Operating Costs =		\$6,295,432	
11					16b) Incentive Costs =		\$5,319,888	
12	2) Non-Gas Fuel Retail Rate (\$/Fuel Unit) =			\$0.00	16c) Total Utility Project Costs =		\$11,615,320	
13	Escalation Rate =			2.16%				
14	Non-Gas Fuel Units (ie. kWh,Gallons, etc) =				17) Direct Participant Costs (\$/Part.) =		\$252	
15								
16	3) Commodity Cost (\$/Dth) =			\$4.27	18) Participant Non-Energy Costs (Annual \$/Part.) =		\$0	
17	Escalation Rate =			4.00%	Escalation Rate =		0.00%	
18								
19	4) Demand Cost (\$/Unit/Yr) =			\$129.27	19) Participant Non-Energy Savings (Annual \$/Part.) =		\$0	
20	Escalation Rate =			4.00%	Escalation Rate =		0.00%	
21								
22	5) Peak Reduction Factor =			1.00%	20) Project Life (Years) =		11.5	
23								
24	6) Variable O&M (\$/Dth) =			\$0.05	21) Avg. Dth/Part. Saved =		5.44	
25	Escalation Rate =			4.00%				
26					22) Avg Non-Gas Fuel Units/Part. Saved =		0.00	
27	7) Non-Gas Fuel Cost (\$/Fuel Unit) =			\$0.00	22a) Avg Additional Non-Gas Fuel Units/ Part. Used =		0.00	
28	Escalation Rate =			2.16%				
29					23) Number of Participants =		93,777	
30	8) Non-Gas Fuel Loss Factor			0.00%				
31					24) Total Annual Dth Saved =		509,758	
32	9) Gas Environmental Damage Factor =			\$0.3800	25) Incentive/Participant =		\$57	
33	Escalation Rate =			2.16%				
34								
35	10) Non Gas Fuel Environmental Damage Factor =			\$0.00				
36	Escalation Rate =			0.00%				
37								
38	11) Participant Discount Rate =			2.55%				
39								
40	12) Utility Discount Rate =			7.30%				
41								
42	13) Societal Discount Rate =			2.55%				
43								
44	14) General Input Data Year =			2016				
45								
46	15) Project Analysis Year 1 =			2017				
47	15a) Project Analysis Year 2 =			2018				
48	15c) Project Analysis Year 3 =			2019				
49								
50								
51								
52	Cost Summary		2nd Yr		Test Results		Triennial NPV	Triennial B/C
53								
54	Utility Cost per Participant =		\$123.86		Ratepayer Impact Measure Test		(\$71,476,052)	0.29
55	Cost per Participant per Dth =		\$69.09					
56					Utility Cost Test		\$18,463,890	2.71
57	Lifetime Energy Reduction (Dth)	6,117,099						
58					Societal Test		\$12,288,665	1.42
59	Societal Cost per Dth	\$4.77						
60					Participant Test		\$102,327,627	5.45

**2018 ACTUAL**

Add Drop Down or Label for each Utility Name to specify

Instructions:

1.) Yellow highlighted fields must

Inputs		Location:
2013 Weather-Normalized Sales (Dth)	53,488,276	CIP Status Report
2014 Weather-Normalized Sales (Dth)	56,095,257	CIP Status Report
2015 Weather-Normalized Sales (Dth)	48,615,230	CIP Status Report
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	From Commissioner's Order approving 2017-2019 Triennial CIP Filing
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	12.0%	maximum net benefits awarded
Max Percent of Expenditures Awarded	35.0%	
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 2018 Achievements		
Expenditures	\$11,777,436	CIP Status Report
Energy Saved (first year Dth saved)	509,758	CIP Status Report
Net Benefits Achieved	\$18,463,890	BenCost Model
Shared Savings Incentive Results		
Achievement Level	0.97%	
Percent of Net Benefits Awarded	10.2501%	
Financial Incentive Award	\$1,892,566	
Incentive/First Year Dth Saved \$	\$3.7127	
Incentive/Net Benefits	10.25%	
Incentive/CIP Expenditures	16.07%	

**Estimated Incentive Levels by Achievement Level**

Achievement Level (% of sales)	Energy Saved	Percent of Net Benefits Awarded	Estimated Net Benefits Achieved	Incentive Award	Average Incentive per unit Saved	Incremental Incentive Units 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

**2019 FORECAST**

Add Drop Down or Label for each Utility Name to specify

Instructions:

1.) Yellow highlighted fields must be update

Inputs		Location:
2013 Weather-Normalized Sales (Dth)	53,488,276	CIP Status Report
2014 Weather-Normalized Sales (Dth)	56,095,257	CIP Status Report
2015 Weather-Normalized Sales (Dth)	48,615,230	CIP Status Report
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	\$12,322,541	From Commissioner's Order approving 2017-2019 Triennial CIP Filing
Approved CIP Energy Savings Goal (Dth)	552,566	From Commissioner's Order approving 2017-2019 Triennial CIP Filing
Estimated Net Benefits at Energy Savings Goal	\$26,152,255	From Utility 2017-2019 Triennial CIP Filing.
Energy savings at 1.5% (Dth)	790,994	
Incentive Calibration		
Max Percent of Net Benefits Awarded	10.0%	maximum net benefits awarded
Max Percent of Expenditures Awarded	30.0%	
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

Forecasted 2019 Achievements	
Expenditures	\$12,322,541
Energy Saved (first year Dth saved)	552,566
Net Benefits Achieved	\$26,122,255
Shared Savings Incentive Results	
Achievement Level	1.05%
Percent of Net Benefits Awarded	8.8589%
Financial Incentive Award	\$2,314,153
Incentive/First Year Dth Saved \$	\$4.1880
Incentive/Net Benefits	8.86%
Incentive/CIP Expenditures	18.78%

**Estimated Incentive Levels by Achievement Level**

Achievement Level (% of sales)	Energy Saved	Percent of Net Benefits Awarded	Estimated Net Benefits Achieved	Incentive Award	Average Incentive per unit Saved	Incremental Incentive Units Saved
0.0%	0	0.00%	\$0	\$0	\$0.000	-
0.1%	52,733	0.00%	\$2,495,783	\$0	\$0.000	\$0.000
0.2%	105,466	0.00%	\$4,991,566	\$0	\$0.000	\$0.000
0.3%	158,199	0.00%	\$7,487,349	\$0	\$0.000	\$0.000
0.4%	210,932	0.00%	\$9,983,132	\$0	\$0.000	\$0.000
0.5%	263,665	0.00%	\$12,478,915	\$0	\$0.000	\$0.000
0.6%	316,398	0.00%	\$14,974,698	\$0	\$0.000	\$0.000
0.7%	369,130	6.25%	\$17,470,481	\$1,091,905	\$2.958	\$20.706
0.8%	421,863	7.00%	\$19,966,264	\$1,397,638	\$3.313	\$5.798
0.9%	474,596	7.75%	\$22,462,046	\$1,740,809	\$3.668	\$6.508
1.0%	527,329	8.50%	\$24,957,829	\$2,121,416	\$4.023	\$7.218
1.1%	580,062	9.25%	\$27,453,612	\$2,539,459	\$4.378	\$7.928
1.2%	632,795	10.00%	\$29,949,395	\$2,994,940	\$4.733	\$8.637
1.3%	685,528	10.00%	\$32,445,178	\$3,244,518	\$4.733	\$4.733
1.4%	738,261	10.00%	\$34,940,961	\$3,494,096	\$4.733	\$4.733
1.5%	790,994	10.00%	\$37,436,744	\$3,743,674	\$4.733	\$4.733
1.6%	843,727	10.00%	\$39,932,527	\$3,993,253	\$4.733	\$4.733
1.7%	896,460	10.00%	\$42,428,310	\$4,242,831	\$4.733	\$4.733
1.8%	949,193	10.00%	\$44,924,093	\$4,492,409	\$4.733	\$4.733
1.9%	1,001,925	10.00%	\$47,419,876	\$4,741,988	\$4.733	\$4.733
2.0%	1,054,658	10.00%	\$49,915,659	\$4,991,566	\$4.733	\$4.733
2.1%	1,107,391	10.00%	\$52,411,442	\$5,241,144	\$4.733	\$4.733
2.2%	1,160,124	10.00%	\$54,907,225	\$5,490,722	\$4.733	\$4.733
2.3%	1,212,857	10.00%	\$57,403,008	\$5,740,301	\$4.733	\$4.733
2.4%	1,265,590	10.00%	\$59,898,791	\$5,989,879	\$4.733	\$4.733
2.5%	1,318,323	10.00%	\$62,394,574	\$6,239,457	\$4.733	\$4.733
2.6%	1,371,056	10.00%	\$64,890,356	\$6,489,036	\$4.733	\$4.733
2.7%	1,423,789	10.00%	\$67,386,139	\$6,738,614	\$4.733	\$4.733
2.8%	1,476,522	10.00%	\$69,881,922	\$6,988,192	\$4.733	\$4.733
2.9%	1,529,255	10.00%	\$72,377,705	\$7,237,771	\$4.733	\$4.733
3.0%	1,581,988	10.00%	\$74,873,488	\$7,487,349	\$4.733	\$4.733

# ATTACHMENT C

MERC  
CCRA Calculation  
To Be Effective January 1, 2020

Forecasted beginning balance (January 1, 2020)	\$ (6,842,663.38)
Proposed Expenditures (January 2020-December 2020)	\$ 12,246,800.00
Forecasted 2018 Incentive (to be approved in 2019)	\$1,892,566
Forecasted 2019 Incentive (to be approved in 2020)	\$2,314,153
Less forecasted CCRC recovery (January 2020-December 2020)	\$ (13,730,388.57)
Projected carrying charges for 2020	\$ (310,126.14)
Forecasted December 2020 Balance	\$ (4,429,658.56)
Forecasted gas sales (January 2020-December 2020) Therms	464,964,056
CCRA=\$/therm beginning January 1, 2020	\$ (0.00953)

# **ATTACHMENT D**

# Clean Tariff Sheet

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**CONSERVATION COST RECOVERY CHARGE AND ADJUSTMENT**

7th Revised Sheet No. 7.02a

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All Classes MERC (\$0.00953)\*

\*Approved effective January 1, 2020 in Docket No. G011/M-19-

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.



# Redline Tariff Sheet

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**CONSERVATION COST RECOVERY CHARGE AND ADJUSTMENT**

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76th Revised Sheet No. 7.02a

All Classes MERC (\$0.00~~953000~~)\*

\*Approved effective ~~September-January~~ 1, 20~~18~~20 in Docket No. G011/M-1~~89-117~~

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.

In the Matter of the Petition of Minnesota  
Energy Resources Corporation for Approval  
of the 2018 Conservation Improvement  
Program Tracker Account, Demand-Side  
Management Financial Incentive, and  
Conservation Cost Recovery Adjustment  
Factor

Docket No. G011/M-19-\_\_\_\_

**CERTIFICATE OF SERVICE**

I, Lauren E. Pockl, hereby certify that on the 1st day of May, 2019, 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](http://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, 2019.

/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.com	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.state.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	Seth.DeMerritt@wecenergygroup.com	MERC (Holding)	700 North Adams PO Box 19001 Green Bay, WI 543079001	Electronic Service	No	GEN_SL_Minnesota Energy Resources Corporation_General Service List
Ian	Dobson	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	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
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.com	Stoel Rives LLP	33 South Sixth St Ste 4200  Minneapolis, MN 55402	Electronic Service	No	GEN_SL_Minnesota Energy Resources Corporation_General Service List
Catherine	Phillips	catherine.phillips@we-energies.com	We Energies	231 West Michigan St  Milwaukee, WI 53203	Electronic Service	No	GEN_SL_Minnesota Energy Resources Corporation_General Service List
Elizabeth	Schmiesing	eschmiesing@winthrop.com	Winthrop & Weinstine, P.A.	225 South Sixth Street Suite 3500 Minneapolis, MN 55402	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
Colleen	Sipiorski	Colleen.Sipiorski@wecenergygroup.com	Minnesota Energy Resources Corporation	700 North Adams St Green Bay, WI 54307	Electronic Service	No	GEN_SL_Minnesota Energy Resources Corporation_General Service List
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
Mary	Wolter	mary.wolter@wecenergygroup.com	Minnesota Energy Resources Corporation (HOLDING)	231 West Michigan St Milwaukee, WI 53203	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.com	Interstate Power & Light Company	PO Box 351 200 1st St SE Cedar Rapids, IA 524060351	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Lisa	Beckner	lbeckner@mnpower.com	Minnesota Power	30 W Superior St  Duluth, MN 55802	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
William	Black	bblack@mmua.org	MMUA	Suite 400 3025 Harbor Lane North Plymouth, MN 554475142	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Christina	Brusven	cbrusven@fredlaw.com	Fredrikson Byron	200 S 6th St Ste 4000  Minneapolis, MN 554021425	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Charlie	Buck	charlie.buck@oracle.com	Oracle	760 Market St FL 4  San Francisco, CA 94102	Electronic Service	No	SPL_SL__CIP 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_SL__CIP SPECIAL SERVICE LIST
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	No	SPL_SL__CIP SPECIAL SERVICE LIST
George	Crocker	gwillc@nawo.org	North American Water Office	PO Box 174  Lake Elmo, MN 55042	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Ian	Dobson	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Steve	Downer	sdowner@mmua.org	MMUA	3025 Harbor Ln N Ste 400  Plymouth, MN 554475142	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Charles	Drayton	charles.drayton@enbridge.com	Enbridge Energy Company, Inc.	7701 France Ave S Ste 600  Edina, MN 55435	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Jim	Erchul	jerschul@dbnhs.org	Daytons Bluff Neighborhood Housing Sv.	823 E 7th St  St. Paul, MN 55106	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Greg	Ernst	gaernst@q.com	G. A. Ernst & Associates, Inc.	2377 Union Lake Trl  Northfield, MN 55057	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Melissa S	Feine	melissa.feine@semcac.org	SEMCAC	PO Box 549 204 S Elm St Rushford, MN 55971	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 280  Saint Paul, MN 551012198	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Rob	Friend	rfriend@mnchamber.com	Minnesota Chamber of Commerce - MN Waste Wise Foundation	400 Robert St N Ste 1500  Saint Paul, MN 55101	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Angela E.	Gordon	angela.e.gordon@lmco.com	Lockheed Martin	1000 Clark Ave.  St. Louis, MO 63102	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Pat	Green	N/A	N Energy Dev	City Hall 401 E 21st St Hibbing, MN 55746	Paper Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Jason	Grenier	jgrenier@otpc.com	Otter Tail Power Company	215 South Cascade Street  Fergus Falls, MN 56537	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Jeffrey	Haase	jhaase@grenergy.com	Great River Energy	12300 Elm Creek Blvd  Maple Grove, MN 55369	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
Tony	Hainault	anthony.hainault@co.henn epin.mn.us	Hennepin County DES	701 4th Ave S Ste 700  Minneapolis, MN 55415-1842	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Tyler	Hamman	tylerh@bepec.com	Basin Electric Power Cooperative	1717 E Interstate Ave  Bismarck, ND 58501	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Patty	Hanson	phanson@rpu.org	Rochester Public Utilities	4000 E River Rd NE  Rochester, MN 55906	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Norm	Harold	N/A	NKS Consulting	5591 E 180th St  Prior Lake, MN 55372	Paper Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Scott	Hautala	scotth@hpuc.com	Hibbing Public Utilities	1902 E 6th Ave  Hibbing, MN 55746	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Kimberly	Hellwig	kimberly.hellwig@stoel.co m	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Jared	Hendricks	hendricksj@owatonnautiliti es.com	Owatonna Public Utilities	PO Box 800 208 S Walnut Ave Owatonna, MN 55060-2940	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Karolanne	Hoffman	kmh@dairy.net	Dairyland Power Cooperative	PO Box 817  La Crosse, WI 54602-0817	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Dave	Johnson	dave.johnson@aeoa.org	Arrowhead Economic Opportunity Agency	702 3rd Ave S  Virginia, MN 55792	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
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