

BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

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

Chair
Commissioner
Commissioner
Commissioner
Commissioner

Lisa H. Perkett
Principal Financial Consultant,
Capital Asset Accounting
Xcel Energy
414 Nicollet Mall, 401 – 3rd Floor
Minneapolis, MN 55401

SERVICE DATE: September 4, 2018

DOCKET NO. E,G-002/D-18-162

In the Matter of Northern States Power Company's (Xcel) 2018 Annual Review of
Remaining Lives

The above-entitled matter was considered by the Commission on August 16, 2018, and the
following disposition made:

- 1. Approved Xcel's proposed depreciation lives and salvage rates for its electric production, gas production, and gas storage facilities.**
- 2. Required Xcel to file its next remaining life depreciation petition by February 18, 2019.**
- 3. Required Xcel to continue to provide in future depreciation filings a comparison of depreciation remaining lives and resource planning lives for electric production with an explanation of any differences.**
- 4. Required Xcel to continue to provide in future depreciation filings a historical comparison of changes in remaining lives and net salvage rates.**
- 5. Required Xcel to continue to provide in future depreciation filings updates on removal costs for the Minnesota Valley Plant, Key City Plant and Black Dog Units 3 and 4, including the impact on depreciation reserves, and a final true-up when the retirement/removal is completed.**

The Commission agrees with and adopts the recommendations of the Department of Commerce, which are attached and hereby incorporated into the order. This order shall become effective immediately.

BY ORDER OF THE COMMISSION



Daniel P. Wolf
Executive Secretary

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April 20, 2018

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

RE: **Comments of the Minnesota Department of Commerce, Division of Energy Resources**
Docket No. E,G002/D-18-162

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 (Xcel or the Company) 2018 Annual Review of Remaining Lives.

The initial petition was filed on February 20, 2018 followed by a supplemental filing on March 15, 2018 to add an asset omitted from the initial filing. The initial and supplemental petitions were filed by:

Lisa H. Perkett
Principal Financial Consultant, Capital Asset Accounting
Xcel Energy
414 Nicollet Mall, 401 – 3rd Floor
Minneapolis, MN 55401

The Department recommends **approval**, and is available to answer any questions the Minnesota Public Utilities Commission may have.

Sincerely,

/s/ CHARLES AMEVO
Financial Analyst

CA/lt
Attachment



Before the Minnesota Public Utilities Commission

Comments of the Minnesota Department of Commerce Division of Energy Resources

Docket No. E,G002/D-18-162

I. SUMMARY OF THE UTILITY'S PROPOSAL

On February 20, 2018, Northern States Power Company, doing business as Xcel Energy (Xcel or the Company), filed its 2018 Review of Remaining Lives Petition (Petition) with the Minnesota Public Utilities Commission (Commission). On March 15, 2018 the Company filed a supplemental petition to add additional information omitted in the initial filing. The Company is requesting approval of its proposed remaining lives, salvage rates, and depreciation rates for its electric and natural gas production facilities and gas storage facilities. Specifically, the Company requested:

- to make 1-year passage of time adjustments for the remaining lives for all electric and natural gas production and gas storage facilities; and
- to transfer heat recovery team generators within "Other Production Plant (FERC account 342 - Fuel Holders, Producers, and Accessories and FERC Account 344 – Generators) to FERC Account 343 – Prime Movers on the Other Production Black Dog Unit 5, High Bridge, and Riverside; and keep the same lives and net salvage rates for transferred Fuel Holders, Producers, and Accessories and Generators at each of the three plant locations.

Xcel requested that its proposed depreciation parameters and rates be approved effective January 1, 2018. The net effect of the proposed changes has no change in total company depreciation expense.

II. DEPARTMENT ANALYSIS

A. DEPRECIATION RULES

Minnesota Statutes Section 216B.11 and Minnesota Rules, parts 7825.0500-7825.0900 require public utilities to seek Commission approval of their depreciation practices. Utilities must also file depreciation studies at least once every five years and must use straight-line depreciation unless the utility can justify a different method. 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.
After review, the Department concludes that Xcel's Petition complies with all applicable rules.

B. COMPLIANCE WITH PRIOR COMMISSION ORDERS

The Commission's February 8, 2018 Order (the 2017 Depreciation Order) in Docket No. E,G002/D-17-147 (the 2017 Depreciation Docket) required Xcel to:

- file its 2018 remaining life depreciation petition by February 19, 2018;
- continue to provide in future depreciation filings a comparison of depreciation remaining lives and resource planning lives for electric production assets with an explanation of any differences;
- continue to provide in future depreciation filings a historical comparison of changes in remaining lives and net salvage rates;
- continue to provide in future depreciation filings updates on removal costs for the Minnesota Valley plant, Key City Plant, Black Dog Units 3 and 4, including the impact on depreciation reserves, and a final true up when the retirement/removal is complete;
- file further details on its management of dismantling activities and costs, develop a method to compare its actual and projected removal costs to the cost estimates from its net salvage rate study, and provide a revised update for these costs and the depreciation reserve balance for Black Dog Units 3 and 4, the Key City Plant and the Minnesota Valley Plant;
- demonstrate in its next rate case and rider proceedings that there are no cost impacts to Minnesota ratepayers due to Xcel's accounting treatment of its theoretical reserve amortization.

The Company filed the following attachments in support to its Petition and in compliance to the 2017 Depreciation Order:

- Attachment A - Update: Summary of Proposed Remaining Lives (March 15, 2018 Supplement to Petition)
- Attachment B: Comparison of Present and Proposed Lives (February 20, 2018 Initial Petition)
- Attachment C: 2017 Plant In-Service (February 20, 2018 Initial Petition)
- Attachment D: 2017 Analysis of Depreciation Reserve (February 20, 2018 Initial Petition)
- Attachment E: 2017 Summary of Annual Depreciation Accruals (February 20, 2018 Initial Petition)

- Attachment F: Integrated Resource Plan Comparison (February 20, 2018 Initial Petition)
- Attachment G: Historical Comparison of Changes to Remaining Life (February 20, 2018 Initial Petition)

After review, the Department concludes that Xcel's Petition reasonably complied with the February 8, 2018 Depreciation Order.

C. ANALYSIS OF PROPOSED CHANGES TO REMAINING LIVES AND SALVAGE RATES FOR ELECTRIC PRODUCTION FACILITIES

1. Transfer of assets from FERC Accounts 342 and 344 to FERC Account 343

Xcel proposed to move assets (heat recovery steam generators) they have been capitalizing to FERC Account 342 – Fuel Holders, Producers, and Accessories and FERC Account 344 – Generators to FERC Account 343 – Prime Movers. Xcel stated that historically, the FERC Account - 343 has not been used by Northern States Power Company – Minnesota (NSP-MN) and for better classification the Company is proposing to transfer the assets previously capitalized to FERC Account 342 and FERC Account 344 to FERC Account 343. Xcel indicated that the transferred assets will retain the same accounting attributes with the same remaining lives and net salvage rates as approved in the Commission's February 08, 2018 Order. The Department reviewed the account characteristics of all three FERC Accounts (342, 343 and 344) and concludes that the requested transfer appears reasonable.

2. Remaining Lives and Salvage Rates

Xcel proposed to adjust all currently approved remaining lives by one year to reflect the passage of time and leave all currently approved salvage rates unchanged. The Department concludes that Xcel's proposals are reasonable.

D. UPDATES ON REMOVAL COSTS

As noted above, the Commission's February 8, 2018 Order in the 2017 Depreciation Docket, required Xcel to "file further details on its management of dismantling activities and costs, develop a method to compare its actual and projected removal costs to the cost estimates from its net salvage rate study, and provide a revised update for these costs and the depreciation reserve balance for Black Dog Units 3 and 4, the Key City Plant and the Minnesota Valley Plant."¹

¹ Docket E, G-002/D-17-147 Order Approving Depreciation Lives and Salvage Rates and Setting Additional Requirements.

Xcel compared the dismantling costs shown in TLG Services Inc.'s (TLG)² Dismantling Study with the Company's internal estimates.

The Department summarizes below the information provided by Xcel in compliance with Commission-ordered reporting requirements in the 2017 Depreciation Docket.

1. Minnesota Valley

The Company provided an update on removal costs for Minnesota Valley on page 8 - 9 of its Petition. The Company stated that the dam removal efforts have been completed but the remediation process still needs to be completed and that the Company is not far enough along in the process of plant demolition to have detailed estimates available for comparison. Xcel also stated that it believes the Minnesota Valley cost estimate presented by TLG in the 2015 remaining life docket (Docket No. E,G002/D-15-46) is reasonable, and has no variance to address at this time.

2. Black Dog Units 3 and 4

The Company provided an update on removal activity at Black Dog Units 3 and 4 on pages 6 - 8 of its Petition. Xcel estimated that dismantling of the Steam Production Black Dog units will cost \$65.5 million. Xcel stated that over the life of the two units, it collected \$30.9 million for general dismantling activities. An additional \$33.2 million is being collected over 15 years for coal yard remediation with another \$1.5 million above the original TLG estimate for the Unit 2 Boiler removal.

The Table 1³ on page 8 of the Company's initial Petition shows how Xcel's internal removal cost estimates for Steam Black Dog compared to the TLG estimates. The comparison by line item in Table 1 referenced above shows some significant variances between the estimates but in total, the variances do not reveal a pattern of over- or under-estimates. Xcel explained the most significant differences, noting that coal yard remediation is expected to cost less due to the differences in the labor market between the time of the estimate and the time of the contracts. Xcel's higher estimate related to boiler work relates to the additional effort required so that certain structures can continue to be used to support the remaining Other Production function. Finally, Xcel indicated that scrap values are currently about half of what they were at the time of the TLG Study.

² Xcel contracted with TLG Services, Inc. in 2014 to provide a dismantling study on all steam, hydro, and other production electric generating plants. See page 10 of the initial petition in Docket No. E,G002/D-15-46.

³ Docket E, G-002/D-18-162 Initial filing page 8 Table 1: Comparison of Steam Black Dog Removal Estimates.

3. Key City

The Company provided an update on removal costs for Key City plant on page 9 - 10 of its Petition. The Company indicated that it intends to maintain the Key City facility in a dormant state to support continued operations of the Granite City facility up to the date that the Granite City is retired and Xcel does not expect initial dismantling activities to start sooner than mid-2019. The Company believes that the Key City cost estimate presented by TLG in 2015 remaining life filing is reasonable, and has no variances to address at this time.

The Department notes that Xcel's summary is consistent with the Company's description in the 2017 Depreciation Docket, which the Commission accepted.

4. Conclusion

The Department concludes that Xcel complied with the Commission's directive to provide an update of the Company's dismantling effort and costs, and that the Company's information appears reasonable. The Department recommends that the Commission continue to require Xcel to provide details on its management of dismantling activities and costs, compare its actual and projected removal costs to the cost estimates from its net salvage rate study, and provide a revised update for these costs and the depreciation reserve balance for Black Dog Units 3 and 4, the Key City Plant and the Minnesota Valley Plant in future depreciation filings.

III. CONCLUSION AND RECOMMENDATIONS

After review, the Department concludes that Xcel's Petition is reasonable and recommends that the Commission approve it. The Department's recommendations will result in no increase in total-company depreciation expense.

The Department recommends that the Commission:

- approve Xcel's proposed depreciation lives and salvage rates for its electric production, gas production, and gas storage facilities;
- require Xcel to file its next remaining life depreciation petition by February 18, 2019;
- require Xcel to continue to provide in future depreciation filings a comparison of depreciation remaining lives and resource planning lives for electric production with an explanation of any differences;
- require Xcel to continue to provide in future depreciation filings a historical

- comparison of changes in remaining lives and net salvage rates; and
- require Xcel to continue to provide in future depreciation filings updates on removal costs for the Minnesota Valley Plant, Key City Plant and Black Dog Units 3 and 4, including the impact on depreciation reserves, and a final true-up when the retirement/removal is completed.

/lt

CERTIFICATE OF SERVICE

I, Robin Benson, hereby certify that I have this day, served a true and correct copy of the following document to all persons at the addresses indicated below or on the attached list by electronic filing, electronic mail, courier, interoffice mail or by depositing the same enveloped with postage paid in the United States mail at St. Paul, Minnesota.

Minnesota Public Utilities Commission ORDER

Docket Numbers: **E,G-002/D-18-162**

Dated this **4th** day of **September, 2018**

/s/ Robin Benson

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_18-162_D-18-162
Christopher	Anderson	canderson@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022191	Electronic Service	No	OFF_SL_18-162_D-18-162
Alison C	Archer	aarcher@misoenergy.org	MISO	2985 Ames Crossing Rd Eagan, MN 55121	Electronic Service	No	OFF_SL_18-162_D-18-162
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_18-162_D-18-162
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_18-162_D-18-162
William A.	Blazar	bblazar@mnchamber.com	Minnesota Chamber Of Commerce	Suite 1500 400 Robert Street North St. Paul, MN 55101	Electronic Service	No	OFF_SL_18-162_D-18-162
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_18-162_D-18-162
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_18-162_D-18-162
John	Coffman	john@johncoffman.net	AARP	871 Tuxedo Blvd. St, Louis, MO 63119-2044	Electronic Service	No	OFF_SL_18-162_D-18-162
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_18-162_D-18-162

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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_18-162_D-18-162
George	Crocker	gwillc@nawo.org	North American Water Office	PO Box 174 Lake Elmo, MN 55042	Electronic Service	No	OFF_SL_18-162_D-18-162
Carl	Cronin	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_18-162_D-18-162
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_18-162_D-18-162
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_18-162_D-18-162
John	Farrell	jfarrell@ilsr.org	Institute for Local Self-Reliance	1313 5th St SE #303 Minneapolis, MN 55414	Electronic Service	No	OFF_SL_18-162_D-18-162
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_18-162_D-18-162
Stephen	Fogel	Stephen.E.Fogel@XcelEnergy.com	Xcel Energy Services, Inc.	816 Congress Ave, Suite 1650 Austin, TX 78701	Electronic Service	No	OFF_SL_18-162_D-18-162
Edward	Garvey	edward.garvey@AESLconsulting.com	AESL Consulting	32 Lawton St Saint Paul, MN 55102-2617	Electronic Service	No	OFF_SL_18-162_D-18-162
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_18-162_D-18-162

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Todd J.	Guerrero	todd.guerrero@kutakrock.com	Kutak Rock LLP	Suite 1750 220 South Sixth Street Minneapolis, MN 554021425	Electronic Service	No	OFF_SL_18-162_D-18-162
Kimberly	Hellwig	kimberly.hellwig@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_18-162_D-18-162
Annete	Henkel	mui@mnutilityinvestors.org	Minnesota Utility Investors	413 Wacouta Street #230 St. Paul, MN 55101	Electronic Service	No	OFF_SL_18-162_D-18-162
Michael	Hoppe	il23@mtn.org	Local Union 23, I.B.E.W.	932 Payne Avenue St. Paul, MN 55130	Electronic Service	No	OFF_SL_18-162_D-18-162
Julia	Jazynka	jjazynka@energyfreedomcoalition.com	Energy Freedom Coalition of America	101 Constitution Ave NW Ste 525 East Washington, DC 20001	Electronic Service	No	OFF_SL_18-162_D-18-162
Alan	Jenkins	aj@jenkinsatlaw.com	Jenkins at Law	2265 Roswell Road Suite 100 Marietta, GA 30062	Electronic Service	No	OFF_SL_18-162_D-18-162
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_18-162_D-18-162
Richard	Johnson	Rick.Johnson@lawmoss.com	Moss & Barnett	150 S. 5th Street Suite 1200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_18-162_D-18-162
Sarah	Johnson Phillips	sarah.phillips@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_18-162_D-18-162

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_18-162_D-18-162
Thomas	Koehler	TGK@IBEW160.org	Local Union #160, IBEW	2909 Anthony Ln St Anthony Village, MN 55418-3238	Electronic Service	No	OFF_SL_18-162_D-18-162
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_18-162_D-18-162
Douglas	Larson	dlarson@dakotaelectric.com	Dakota Electric Association	4300 220th St W Farmington, MN 55024	Electronic Service	No	OFF_SL_18-162_D-18-162
Peder	Larson	plarson@larkinhoffman.com	Larkin Hoffman Daly & Lindgren, Ltd.	8300 Norman Center Drive Suite 1000 Bloomington, MN 55437	Electronic Service	No	OFF_SL_18-162_D-18-162
Eric	Lipman	eric.lipman@state.mn.us	Office of Administrative Hearings	PO Box 64620 St. Paul, MN 551640620	Electronic Service	No	OFF_SL_18-162_D-18-162
Ryan	Long	ryan.j.long@xcelenergy.com	Xcel Energy	414 Nicollet Mall 401 8th Floor Minneapolis, MN 55401	Electronic Service	No	OFF_SL_18-162_D-18-162
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_18-162_D-18-162
Kavita	Maini	kmairi@wi.rr.com	KM Energy Consulting LLC	961 N Lost Woods Rd Oconomowoc, WI 53066	Electronic Service	No	OFF_SL_18-162_D-18-162
Pam	Marshall	pam@energycents.org	Energy CENTS Coalition	823 7th St E St. Paul, MN 55106	Electronic Service	No	OFF_SL_18-162_D-18-162

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_18-162_D-18-162
David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022093	Electronic Service	No	OFF_SL_18-162_D-18-162
Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP	33 South Sixth St Ste 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_18-162_D-18-162
David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency	220 South Sixth Street Suite 1300 Minneapolis, Minnesota 55402	Electronic Service	No	OFF_SL_18-162_D-18-162
Carol A.	Overland	overland@legalelectric.org	Legalelectric - Overland Law Office	1110 West Avenue Red Wing, MN 55066	Electronic Service	No	OFF_SL_18-162_D-18-162
Jeff	Oxley	jeff.oxley@state.mn.us	Office of Administrative Hearings	600 North Robert Street St. Paul, MN 55101	Electronic Service	No	OFF_SL_18-162_D-18-162
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_18-162_D-18-162
Richard	Savelkoul	rsavelkoul@martinsquires.com	Martin & Squires, P.A.	332 Minnesota Street Ste W2750 St. Paul, MN 55101	Electronic Service	No	OFF_SL_18-162_D-18-162
Inga	Schuchard	ischuchard@larkinhoffman.com	Larkin Hoffman	8300 Norman Center Drive Suite 1000 Minneapolis, MN 55437	Electronic Service	No	OFF_SL_18-162_D-18-162

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Zeviel	Simpser	zsimpser@briggs.com	Briggs and Morgan PA	2200 IDS Center80 South Eighth Street Minneapolis, MN 554022157	Electronic Service	No	OFF_SL_18-162_D-18-162
Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.	76 W Kellogg Blvd St. Paul, MN 55102	Electronic Service	No	OFF_SL_18-162_D-18-162
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_18-162_D-18-162
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_18-162_D-18-162
Eric	Swanson	eswanson@winthrop.com	Winthrop & Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_18-162_D-18-162
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_18-162_D-18-162
Samantha	Williams	swilliams@nrdc.org	Natural Resources Defense Council	20 N. Wacker Drive Ste 1600 Chicago, IL 60606	Electronic Service	No	OFF_SL_18-162_D-18-162
Joseph	Windler	jwindler@winthrop.com	Winthrop & Weinstine	225 South Sixth Street, Suite 3500 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_18-162_D-18-162
Cam	Winton	cwinton@mnchamber.com	Minnesota Chamber of Commerce	400 Robert Street North Suite 1500 St. Paul, Minnesota 55101	Electronic Service	No	OFF_SL_18-162_D-18-162

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_18-162_D-18-162
Patrick	Zomer	Patrick.Zomer@lawmoss.com	Moss & Barnett a Professional Association	150 S. 5th Street, #1200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_18-162_D-18-162