



414 Nicollet Mall
Minneapolis, MN 55401

**PUBLIC DOCUMENT
NOT PUBLIC DATA HAS BEEN EXCISED**

May 6, 2019

—Via Electronic Filing—

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

RE: REPLY COMMENTS
2018 ANNUAL AUTOMATIC ADJUSTMENT OF CHARGES REPORT – GAS &
PURCHASED GAS ADJUSTMENT (PGA) TRUE-UP
DOCKET NOS. G999/AA-18-374 AND G002/AA-18-572

Dear Mr. Wolf:

Northern States Power Company, doing business as Xcel Energy, submits to the Minnesota Public Utilities Commission these Reply Comments in compliance with the Minnesota Public Utilities Commission's February 27, 2019 ORDER ACCEPTING GAS UTILITIES' ANNUAL AUTOMATIC ADJUSTMENT REPORTS AND 2016-2017 TRUE-UP PROPOSALS AND SETTING FURTHER REQUIREMENTS in Docket No. G999/AA-17-493 and in response to the April 25, 2019 REVIEW OF THE 2017-2018 ANNUAL AUTOMATIC ADJUSTMENT REPORTS by the Minnesota Department of Commerce.

Our Reply Comments include information the Company considers to be trade secret data as defined by Minn. Stat. § 13.37. The information derives independent economic value, actual or potential, from not being generally known to, and not being readily ascertainable by proper means by, other persons who can obtain economic value from its disclosure or use. Thus, Xcel Energy maintains this information to be considered non-public and has marked it as PROTECTED DATA.

We have electronically filed this document with the Minnesota Public Utilities Commission, and copies have been served on the parties on the attached service

list. Please contact me at (612) 330-7681 or lisa.r.peterson@xcelenergy.com, or Jennifer Roesler at (612) 330-1925 or jennifer.roesler@xcelenergy.com, if you have any questions regarding this filing.

Sincerely,

/s/

LISA PETERSON
MANAGER, REGULATORY ANALYSIS

Enclosure
c: Service List

PUBLIC DOCUMENT
NOT PUBLIC DATA HAS BEEN EXCISED

STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION

Katie Sieben	Chair
Dan Lipschultz	Commissioner
Valerie Means	Commissioner
Matthew Schuerger	Commissioner
John Tuma	Commissioner

IN THE MATTER OF NORTHERN
STATES POWER COMPANY
ANNUAL AUTOMATIC ADJUSTMENT OF
CHARGES REPORT FOR ITS NATURAL
GAS OPERATION

DOCKET NOS. G999/AA-18-374 &
G002/AA-18-572

REPLY COMMENTS

INTRODUCTION

Northern States Power Company, doing business as Xcel Energy, submits to the Minnesota Public Utilities Commission these Reply Comments in compliance with the Minnesota Public Utilities Commission's February 27, 2019 ORDER ACCEPTING GAS UTILITIES' ANNUAL AUTOMATIC ADJUSTMENT REPORTS AND 2016-2017 TRUE-UP PROPOSALS AND SETTING FURTHER REQUIREMENTS in Docket No. G999/AA-17-493 and in response to the April 25, 2019 REVIEW OF THE 2017-2018 ANNUAL AUTOMATIC ADJUSTMENT REPORTS by the Minnesota Department of Commerce in the above-referenced dockets.

We appreciate the Department's thorough review of the Company's 2018 Gas AAA filing and its recommendation that the Commission accept many of the Company's compliance items. In this Reply, we provide additional information as requested by the Department.

REPLY

A. Compliance with the February 27, 2019 Order

Ordering Paragraph 4 of the February 27, 2019 Order states:

4. *CenterPoint Energy, MERC, and Xcel Gas shall provide, in their reply comments for the 2017 – 2018 reporting year and the five previous reporting years, the following information:*

PUBLIC DOCUMENT
NOT PUBLIC DATA HAS BEEN EXCISED

- *The annual cost of each hedging tool used both in real dollars and as a percent of their actual incurred gas costs;*
- *A comparison of the hedging tool cost to that if the utility would have purchased the gas using the actual 1st of the month index pricing or any other cost comparison the companies believe would be helpful in consultation with the Department;*
- *A nationally recognized index of gas price volatility for each of the years along with an explanation of the index used; and*
- *A discussion of the particular company-specific trends in using hedging tools and how that has informed their strategy moving forward.*

In compliance with the Order, we provide the following response.

The annual cost or gain of hedging instruments used (column E) and the associated percent of annual actual incurred gas costs for Minnesota State (column F) are stated in Table 1 below.

The actual Minnesota State cost of gas with and without the hedging cost or gain is shown in columns C and D respectively in Table 1 below. The Company has reported actual gas purchase costs excluding hedging instead of assuming all gas had been purchased at the actual first of month index because the delta between the with and without hedging system cost is the same under either approach. Financial hedges settle independent of the physical gas purchases made by the company and the resulting cost or gain can be calculated on its own. Using the actual cost of gas purchased for the system as the benchmark for cost without hedging provides a more realistic picture of the impact that hedging has on volatility and customer cost.

Table 1: Minnesota Hedging Costs

A.	B.	C.	D.	E.	F.
Hedge Year	NSPM - Hedged Volumes (Dth)	MN State Actual Costs	MN State Cost Excluding Hedging	Hedging Cost - MN State	MN State Cost as % of Annual
2012-2013	4,530,000	\$251,190,939	\$251,190,939	\$0	0.00%
2013-2014	4,530,000	\$430,082,253	\$438,254,092	(\$8,171,840)	-1.90%
2014-2015	13,590,000	\$293,231,053	\$289,910,496	\$3,320,557	1.13%
2015-2016	11,850,000	\$165,547,394	\$160,868,283	\$4,679,112	2.83%
2016-2017	13,590,000	\$204,075,061	\$202,972,529	\$1,102,532	0.54%
[PROTECTED DATA BEGINS]			[PROTECTED DATA BEGINS]		
2017-2018		\$227,286,024	\$226,926,737		
PROTECTED DATA ENDS]			PROTECTED DATA ENDS]		

PUBLIC DOCUMENT
NOT PUBLIC DATA HAS BEEN EXCISED

Northern States Power Company, a Minnesota corporation (NSPM) is not aware of any nationally recognized index for gas price volatility. Volatility over a period of time can be calculated for any natural gas trading location for which a first of month or daily spot index price is published. Northern Natural Gas (NNG) Ventura is one of several locations where NSPM purchases gas. Table 2 below shows historical volatility at the NNG Ventura location compared to NSPM residential cost of gas for winter months during the heating seasons 2012-2013 through 2017-2018. Historical volatility per heating season is calculated as the standard deviation of month-to-month percentage changes in prices multiplied by the square root of sample prices. This data shows that NSPM cost of gas has been more stable than the index in each of the past six heating seasons when hedging instruments and storage have been utilized through the Company's Price Volatility Mitigation Plan.

Table 2: Minnesota Volatility Comparison

A. Hedge Year	B. NNG- Ventura FOM	C. NSPM Residential Cost of Gas
2012-2013	12.92%	8.25%
2013-2014	49.68%	24.27%
2014-2015	60.44%	23.27%
2015-2016	28.71%	13.89%
2016-2017	57.42%	22.46%
2017-2018	77.35%	22.15%

The overall goal of the Company's Price Volatility Mitigation Plan is to reduce the exposure to and the magnitude of gas price spikes at a reasonable cost to NSPM customers. The Company monitors market trends and has adjusted its use of Call Options, Costless Collars, and Put Options accordingly to implement the financial component of the hedge plan. Each year, the Company performs a statistical analysis of gas price volatility and current market conditions, which is filed with the AAA, and used to guide the Company's hedging strategy. For reference, the analysis prepared prior to the 2018-2019 heating season and filed with the 2018 AAA as Attachment G, Schedule 3, is attached as Attachment A to these Reply Comments. In recent years, the Company has used a mix of At-the-Money (ATM) and Out-the-Money (OTM) options. Prior to the 2015-2016 heating season, the Company primarily used Costless Collars which, as the name suggests do not require the payment of an upfront premium and hence are costless at the time of purchase. However, while collars protect against sharp upward price spikes, they also limit the Company's ability to participate in falling markets. Call Options on the other hand protect against upward price spikes while allowing the Company to participate in downward price movements in exchange for the payment of an

PUBLIC DOCUMENT
NOT PUBLIC DATA HAS BEEN EXCISED

upfront premium, similar to the premium paid for home insurance. Option premiums have fallen with the drop in gas prices and lower market volatility we've experienced in recent years which has made options a more affordable and certain hedging tool. The Company will continue to monitor the market and emerging trends to make informed decisions to provide catastrophic price protection within the approved budget. Further detail about the Company's hedge program is detailed in Attachment G of the AAA filing.

B. Unauthorized Gas Use

The Department requested the Company provide a list of unauthorized gas use during the 2018-2019 heating season and include a discussion detailing barriers to further reducing unauthorized usage, and suggesting possible solutions.

Included as Attachment B is the list of unauthorized gas use during the 2018-2019 heating season. The Company notes that the 2018-2019 unauthorized gas usage total was 15,390 dekatherms, with penalties of \$769,491 after some billing adjustments were made. The only curtailments in the 2018-2019 winter were during the severe weather event.

Typical reasons for customers not curtailing their natural gas use include equipment malfunctions such as failure of regulator valves, burners, or system controls. At times the back-up fuel systems do not operate properly, most common is diesel fuel gelling up and not flowing. There are occasionally site personnel issues with lack of personnel available to support the alternative fuel operation. Another reason is the deliberate choice not to curtail. Customers may run out of back up fuel as well.

As the Company noted in our March 22, 2019 Supplement filing on unauthorized gas use, we have direct contact with customers regarding their responsibility to curtail when called to do so, the financial impact of unauthorized gas use during curtailment, and the impact of unauthorized gas use on the capacity constraints of the system. Currently the tariffed penalty amount for unauthorized gas usage is significant at \$5 per therm.

The Company will continue to monitor the curtailment behavior of our customers and communicate with them regarding unauthorized gas use during curtailment as a breach of service under the interruptible tariffs. A possible solution the Company may consider in the future is to propose a lower interruptible discount for those customers who historically have not fully curtailed when called to do so.

PUBLIC DOCUMENT
NOT PUBLIC DATA HAS BEEN EXCISED

C. High Bridge Adjustment

The Department requested the Company provide additional information regarding the Company's reallocation of costs related to gas volumes used at the High Bridge plant. Specifically, the Department requested an analysis regarding the application of certain Minnesota Rules to the reallocation, as well as the amounts reallocated each year. We respond to these requests below, but first we believe it makes sense to provide further background regarding this issue.

The Company transports gas on Northern Natural Gas (NNG) for both its gas distribution business as well as to be used for fuel at some of the Company's gas-fired electric generating units, including the High Bridge Plant. Xcel-Gas and Xcel-Electric each have their own transportation agreements with NNG, and in the case of the High Bridge Plant, both deliver to the same Town Border Station (TBS). Under the End-User Allocation Service Agreement between Xcel-Gas, Xcel-Electric, and NNG, Xcel-Electric monitors its daily gas use at the plant and schedules gas supplies on NNG as necessary to serve the plant separate from Xcel-Gas' use. On a monthly basis, Xcel-Gas provides NNG with daily information regarding the quantity of gas used at High Bridge. NNG then assigns the delivery quantities measured at the TBS between Xcel-Gas and Xcel-Electric. This assignment is important because it ensures that each group of customers only pays for the quantity of gas delivered for their use. If delivery quantities are understated for Xcel-Electric, then delivery quantities for Xcel-Gas are overstated, and vice versa.

In connection with its investigation into the cause of lost and unaccounted for gas from June 2013 through May 2018, the Company discovered that, during that timeframe, Xcel-Gas had inadvertently been providing NNG with incorrect information regarding the quantity of gas used at High Bridge. Until 2018, Xcel-Gas had been reporting gas quantities used for fuel at its electric plants to NNG based on preliminary data from its SCADA system. Through the Company's audit of lost and unaccounted for gas, we discovered this data was less accurate than data from MV90 meters, which produce billing-quality data. As a result, by relying on the SCADA data, Xcel-Gas unintentionally understated the quantity of gas used at High Bridge to NNG, and Xcel-Electric's customers underpaid for that gas by \$6,004,319. At the same time, the quantity of gas provided to Xcel-Gas was overstated, and its customers overpaid by the same \$6,004,319.

PUBLIC DOCUMENT
NOT PUBLIC DATA HAS BEEN EXCISED

The specific amounts misallocated each year are listed in Table 3, below, and detailed calculations are provided in Attachment C.¹

Table 3: Misallocations

AAA Year	Volume Diff (Dkt)	MN & ND \$	MN \$	ND \$
2013-2014	143,608	784,183	685,313	98,870
2014-2015	316,554	1,266,271	1,098,369	167,902
2015-2016	460,775	1,225,682	1,061,942	163,740
2016-2017	299,564	963,933	823,416	140,517
Subtotal 2013-2017	1,220,501	4,240,069	3,669,040	571,029
2017-2018	556,290	1,764,250	1,512,892	251,359
Total 2013-2018	1,776,791	6,004,319	5,181,931	822,388

When the Company discovered this misallocation of costs between gas and electric customers, we immediately took steps to correct it. We noted this in our 2018 Annual Automatic Adjustment of Charges Report – Gas, Docket No. G999/AA-18-374, and in the Fuel Clause Adjustment Report for October 2018, Docket No. E002/AA-18-622:

An issue was identified at the High Bridge plant whereby SCADA meter data was being provided to NNG as opposed to more accurate volumes from the MV90 meter. This resulted in a total credit to gas commodity expenses of \$6M over 5 AAA years (2013-2018). An entry for this amount was booked during month-end close. The \$6M will be recovered through the electric FCA over the next 12 months beginning in October.

The Company included a credit in the 2017-2018 Natural Gas True-up Report, and the corresponding true-up factors including the credit are effective on natural gas customer bills for the timeframe September 1, 2018, through August 31, 2019. A corresponding expense is being recovered from electric customers through the fuel clause for the timeframe October 1, 2018, through September 30, 2019.

¹ The Company notes that the Department requested a reconciliation of dollar figures provided in the AAA and True-up reporting. Based on each year's actual sales, the total system credit of \$6.0 million was allocated to Minnesota (\$5.2 million) and North Dakota (\$0.8 million) jurisdictions. The \$5.2 million Minnesota credit was reported in two parts – the credit associated with previous years' expenses and the current AAA year expenses. The \$3.7 million was the total of Minnesota 2013-2017 High Bridge adjustment, which was displayed in the 2017-2018 true-up file, Schedule A, page 1 of 2. The 2017-2018 credit of \$1.8 million was displayed in the 2017-2018 true-up file, Schedule H, page 1 of 1. Of the \$1.8 million, \$1.5 million was allocated to Minnesota and the other \$0.3 million was allocated to North Dakota.

PUBLIC DOCUMENT
NOT PUBLIC DATA HAS BEEN EXCISED

To be clear, neither the misallocation of costs nor its correction provides any benefit to the Company. We simply passed certain gas costs on to the wrong customer base, and we are now in the process of passing those costs back to the correct customers. We do not believe the misallocation is a billing error under either Minn. Rule 7820.3800 or 7820.4000. Subpart 1 of each of those rules defines the type of errors to which they apply: “When a customer has been overcharged or undercharged as a result of incorrect reading of the meter, incorrect application of rate schedule, incorrect connection of the meter, application of an incorrect multiplier or constant or other similar reasons[.]” In other words, the billing error rules apply only to issues with a particular customer or set of customers’ meters or bills themselves.² This situation is neither. Instead, this issue relates to the underlying calculation of fuel charges due from all customers.

Additionally, application of the billing rules to this situation would limit our ability to correct the misallocation and ensure that both gas and electric customers pay for the actual costs of the gas used to serve them. Under Minn. Rule 7820.4000, subp. 2, refunds to gas customers for overcharges are limited to the amount overcharged plus interest for “the period beginning three years before the date of discovery.” In this case, that means any refund to gas customers would exclude amounts misallocated before 2015. Likewise, under Minn. Rule 7820.3800, subp. 3, utility recoveries for undercharges are limited to the amount undercharged for “the period beginning one year before the date of discovery.” In this case, that means any recovery from electric customers would exclude amounts misallocated before 2017. We believe the Company’s actions better align with good policy, as they ensure that both gas and electric customers pay for the actual costs of the gas used to serve them.

We are unaware of any particular rule that clearly governs this situation. But, we believe our approach is the most equitable way to handle this issue. Upon discovering our error, we promptly took steps to refund all gas customers for the amount that was overcharged. At the same time we began recovering from all electric customers the corresponding amount that was undercharged. We spread the recovery over twelve months in the same manner as the credit is being returned to gas customers.

² Common examples of billing errors include the failure to apply a Savers Switch discount, billing for the wrong meter, and the application of an incorrect rate.

PUBLIC DOCUMENT
NOT PUBLIC DATA HAS BEEN EXCISED

In addition to correcting the misallocation associated with the High Bridge Plant, we have taken steps to ensure this will not happen again through the addition of monthly communication of MV90 meter data for the purposes of accounting and reporting to NNG.

As explained above, we believe our approach fits within the construct of applicable rules, and we do not believe resolving this misallocation of costs requires any rule variances. However, should the Commission determine otherwise, we respectfully request a variance to the billing error rules (Minn. Rules 7820.3800 and 7820.4000), the automatic adjustment error rule (Minn. Rule 7825.2920, subp. 2), and any other applicable rules necessary to effect the reallocation. Such a variance would be appropriate under the requirements of Minn. Rule 7829.3200.

Minn. Rule 7820.3200 allows the Commission to vary its rules if it finds:

- (a) Enforcement of the rule would impose an excessive burden upon the applicant or others affected by the rule;
- (b) Granting the variance would not adversely affect the public interest; and
- (c) Granting the variance would not conflict with standards imposed by law.

We address these requirements below.

(a) Excessive Burden

Enforcing the rules could impose an excessive burden on both the Company and our customers. If the Commission were to find that the adjustment error or billing rules apply but not grant a variance allowing for the shifting of these costs, gas customers would inequitably pay for gas they did not use.

(b) Public Interest

Granting a variance is in the public interest because it would appropriately rebalance costs between gas and electric customers. If these rules were to apply without variance, the result would be that gas customers subsidized electric customers for gas used at the High Bridge Plant. Granting a variance permits the Company to unwind this unintentional misallocation of costs and ensure that both sets of customers pay for the fuel they used.

PUBLIC DOCUMENT
NOT PUBLIC DATA HAS BEEN EXCISED

(c) No Conflict with Standards Imposed by Law

Granting a variance would not conflict with any standards imposed by law. The Commission has the authority to grant variances to the fuel clause and billing rules.

CONCLUSION

We appreciate the opportunity to submit our Reply to the Department's review of our Gas AAA Report. We have provided additional information in response to the questions raised by the Department. We respectfully request that the Commission accept and approve Xcel Energy's 2018 Gas AAA Report as supplemented by this Reply.

Dated: May 6, 2019

Northern States Power Company

Northern States Power Company
Gas Operations - State of Minnesota
ALTERNATIVE HEDGING STRATEGY ANALYSIS

Docket No. G999/AA-18-374
Attachment G
Schedule 3
Page 1 of 1

PUBLIC DOCUMENT
NOT PUBLIC DATA HAS BEEN EXCISED

Positive values are costs, negative values are gains

Positive values are costs, negative values are gains										ACTUAL RESULTS		COMPARISON SCENARIOS										
Possession Date	Start Date	End Date	Qty	Location	Call Strike	Option Type	Market Price on Trade Date	Avg ATM Market Price on Trade Date	Settlement Price	OTM Premium Paid	Calls		ATM Premium Estimate	Puts		Call on Collar Exercised (\$1 Premium)	Put on Collar Exercised (\$0.50 Premium)	SAVINGS				
											Purchase OTM Exercised	Puts Purchase OTM Exercised		Purchase OTM Exercised	Puts Purchase OTM Exercised							
																					Actual Less Costless	
																					Actual Less Collar (\$1.00 Call/\$0.50 Put)	
November Total										\$ 252,900	\$ -	\$ -	\$ 960,750	\$ -	\$ -	\$ -	\$ 22,770	\$ -	\$ 22,770	\$ (707,850)	\$ 230,130	
December Total										\$ 261,330	\$ -	\$ -	\$ 992,775	\$ (19,577)	\$ -	\$ -	\$ -	\$ -	\$ (711,869)	\$ 261,330		
January Total										\$ 261,330	\$ -	\$ -	\$ 992,775	\$ (419,105)	\$ -	\$ -	\$ 36,549	\$ (711,869)	\$ 261,330			
February Total										\$ 236,040	\$ (861,000)	\$ -	\$ 896,700	\$ (2,135,280)	\$ -	\$ (706,146)	\$ -	\$ (312,341)	\$ 224,781			
March Total										\$ 261,330	\$ -	\$ -	\$ 992,775	\$ -	\$ -	\$ -	\$ 367,350	\$ 613,620	\$ 81,186			
WINTER TOTAL										\$ 1,272,930	\$ (861,000)	\$ -	\$ 4,835,776	\$ (2,573,961)	\$ -	\$ (706,146)	\$ 426,669	\$ (731,445)	\$ (106,020)	\$ (1,849,885)	\$ 691,407	
[PROTECTED DATA BEGINS]																						
November Total										\$ 252,900	\$ -	\$ -	\$ 960,750	\$ -	\$ -	\$ -	\$ 22,770	\$ (707,850)	\$ 230,130	PROTECTED DATA ENDS]		
[PROTECTED DATA BEGINS]																						
December Total										\$ 261,330	\$ -	\$ -	\$ 992,775	\$ (19,577)	\$ -	\$ -	\$ -	\$ -	\$ (711,869)	\$ 261,330	PROTECTED DATA ENDS]	
[PROTECTED DATA BEGINS]																						
January Total										\$ 261,330	\$ -	\$ -	\$ 992,775	\$ (419,105)	\$ -	\$ -	\$ 36,549	\$ (312,341)	\$ 224,781	PROTECTED DATA ENDS]		
[PROTECTED DATA BEGINS]																						
February Total										\$ 236,040	\$ (861,000)	\$ -	\$ 896,700	\$ (2,135,280)	\$ -	\$ (706,146)	\$ -	\$ 613,620	\$ 81,186	PROTECTED DATA ENDS]		
[PROTECTED DATA BEGINS]																						
March Total										\$ 261,330	\$ -	\$ -	\$ 992,775	\$ -	\$ -	\$ -	\$ 367,350	\$ (731,445)	\$ (106,020)	PROTECTED DATA ENDS]		

Northern States Power Company
Gas Operations - Minnesota State
UNAUTHORIZED GAS USAGE AND PENALTIES

Date Billed (1-2 days after usage.)	Customer Name	Priority	Unauthorized	Commodity Rate per Therm	Commodity Calculation (thm*rate)	Penalty per Therm	Financial Penalty Amount
			Gas Used (thm)				
[PROTECTED DATA BEGINS]							
2/22/2019		1A	614	0.096354	\$59.16	\$5.00	\$3,070.00
2/22/2019		1A	437	0.096354	\$42.11	\$5.00	\$2,185.00
3/7/2019		4	7,549.08	0.047512	\$358.67	\$5.00	\$37,745.40
2/11/2019		1A	11.86	0.096354	\$1.14	\$5.00	\$59.30
3/1/2019		1B	1.19	0.096354	\$0.11	\$5.00	\$5.95
3/4/2019		F	479.73	0	\$0.00	\$5.00	\$2,398.65
2/21/2019		1B	1386	0.096354	\$133.55	\$5.00	\$6,930.00
2/11/2019		3	4031.21	0.047512	\$191.53	\$5.00	\$20,156.05
2/15/2019		8	22,063.00	0.43461	\$9,588.80	\$5.00	\$110,315.00
2/19/2019		1B	14	0.096354	\$1.35	\$5.00	\$70.00
3/12/2019		1E	633	0.047512	\$30.08	\$5.00	\$3,165.00
2/7/2019		5	462.96	0.047512	\$22.00	\$5.00	\$2,314.80
2/21/2019		4	10.78	0.047512	\$0.51	\$5.00	\$53.90
2/6/2019		1B	915.51	0.096354	\$88.21	\$5.00	\$4,577.55
2/11/2019		1B	27	0.096354	\$2.60	\$5.00	\$135.00
2/19/2019		3	6	0.047512	\$0.29	\$5.00	\$30.00
2/27/2019		1B	58.61	0.096354	\$5.65	\$5.00	\$293.05
3/4/2019		1A	24	0.096354	\$2.31	\$5.00	\$120.00
2/14/2019		4	129.38	0.047512	\$6.15	\$5.00	\$646.90
2/21/2019		1B	131	0.096354	\$12.62	\$5.00	\$655.00
3/4/2019		1A	18	0.096354	\$1.73	\$5.00	\$90.00
3/4/2019		1B	11.82	0.096354	\$1.14	\$5.00	\$59.10
2/26/2019		1B	10.66	0.096354	\$1.03	\$5.00	\$53.30
2/22/2019		1B	5	0.096354	\$0.48	\$5.00	\$25.00
3/21/2019		2	1929	0.047512	\$91.65	\$5.00	\$9,645.00
2/20/2019		3	119	0.096354	\$11.47	\$5.00	\$595.00
3/7/2019		1B	81.51	0.096354	\$7.85	\$5.00	\$407.55
2/6/2019		1A	50.26	0.096354	\$4.84	\$5.00	\$251.30
3/6/2019		1B	2.38	0.096354	\$0.23	\$5.00	\$11.90
2/25/2019		1B	155.18	0.096354	\$14.95	\$5.00	\$775.90
3/20/2019		3	1735	0.047512	\$82.43	\$5.00	\$8,675.00
2/21/2019		1A	76	0.096354	\$7.32	\$5.00	\$380.00
2/22/2019		1B	14.21	0.096354	\$1.37	\$5.00	\$71.05
2/21/2019		1B	4.74	0.096354	\$0.46	\$5.00	\$23.70
2/13/2019		1B	3	0.096354	\$0.29	\$5.00	\$15.00
2/12/2019		1A	159.87	0.096354	\$15.40	\$5.00	\$799.35
2/18/2019		3	56.81	0.047512	\$2.70	\$5.00	\$284.05
3/6/2019		1A	13	0.096354	\$1.25	\$5.00	\$65.00
2/15/2019		5	10.9	0.047512	\$0.52	\$5.00	\$54.50
2/25/2019		1B	1634.79	0.096354	\$157.52	\$5.00	\$8,173.95
2/15/2019		1B	435.9	0.047512	\$20.71	\$5.00	\$2,179.50
2/21/2019		1B	1491	0.096354	\$143.66	\$5.00	\$7,455.00
3/6/2019		1B	205.71	0.096354	\$19.82	\$5.00	\$1,028.55
2/21/2019		1A	1	0.096354	\$0.10	\$5.00	\$5.00
3/7/2019		1A	246.18	0.096354	\$23.72	\$5.00	\$1,230.90
3/7/2019		1A	22.5	0.096354	\$2.17	\$5.00	\$112.50
3/7/2019		1A	69	0.096354	\$6.65	\$5.00	\$345.00
3/11/2019		1B	1113	0.096354	\$107.24	\$5.00	\$5,565.00
3/6/2019		1B	1320	0.096354	\$127.19	\$5.00	\$6,600.00
2/20/2019		1B	675	0.096354	\$65.04	\$5.00	\$3,375.00
2/15/2019		1B	958.57	0.096354	\$92.36	\$5.00	\$4,792.85
2/18/2019		4	2,038.00	0.047512	\$96.83	\$5.00	\$10,190.00
2/13/2019		1B	228.32	0.096354	\$22.00	\$5.00	\$1,141.60
2/13/2019		1B	9.55	0.096354	\$0.92	\$5.00	\$47.75
2/28/2019		6	43.03	0.043461	\$1.87	\$5.00	\$215.15
2/19/2019		4	324	0.047512	\$15.39	\$5.00	\$1,620.00
2/7/2019		1B	35.31	0.096354	\$3.40	\$5.00	\$176.55
2/21/2019		1B	1054	0.096354	\$101.56	\$5.00	\$5,270.00
2/21/2019		3	78	0.047512	\$3.71	\$5.00	\$390.00
2/15/2019		5	108	0.047512	\$5.13	\$5.00	\$540.00
2/25/2019		1A	586	0.096354	\$56.46	\$5.00	\$2,930.00
2/25/2019		1B	277	0.096354	\$26.69	\$5.00	\$1,385.00
2/7/2019		4	150.35	0.047512	\$7.14	\$5.00	\$751.75
2/19/2019		1A	191.44	0.096354	\$18.45	\$5.00	\$957.20
2/26/2019		1A	22.44	0.096354	\$2.16	\$5.00	\$112.20
2/28/2019		1A	1	0.096354	\$0.10	\$5.00	\$5.00
2/27/2019		1B	2	0.096354	\$0.19	\$5.00	\$10.00
3/8/2019		1B	6	0.096354	\$0.58	\$5.00	\$30.00
2/19/2019		1B	2760.16	0.096354	\$265.95	\$5.00	\$13,800.80
2/19/2019		1B	1.63	0.096354	\$0.16	\$5.00	\$8.15
2/28/2019		1A	1126	0.096354	\$108.49	\$5.00	\$5,630.00
3/8/2019		1B	1466	0.096354	\$141.25	\$5.00	\$7,330.00
3/12/2019		1A	3	0.096354	\$0.29	\$5.00	\$15.00
3/12/2019		1A	6	0.096354	\$0.58	\$5.00	\$30.00
3/12/2019		1A	4	0.096354	\$0.39	\$5.00	\$20.00

Northern States Power Company
Gas Operations - Minnesota State
UNAUTHORIZED GAS USAGE AND PENALTIES

<u>Date Billed</u> <u>(1-2 days after</u> <u>usage)</u>	<u>Customer Name</u>	<u>Priority</u>	<u>Unauthorized</u> <u>Gas Used</u> <u>(thm)</u>	<u>Commodity Rate per</u> <u>Therm</u>	<u>Commodity Calculation</u> <u>(thm*rate)</u>	<u>Penalty per</u> <u>Therm</u>	<u>Financial Penalty</u> <u>Amount</u>
[PROTECTED DATA BEGINS]							
2/22/2019		1A	9.49	0.096354	\$0.91	\$5.00	\$47.45
2/8/2019		1B	646.28	0.096354	\$62.27	\$5.00	\$3,231.40
2/11/2019		2	131	0.047512	\$6.22	\$5.00	\$655.00
2/14/2019		1B	574.69	0.096354	\$55.37	\$5.00	\$2,873.45
2/20/2019		1A	1	0.096354	\$0.10	\$5.00	\$5.00
2/5/2019		F	7,796.20	0	\$0.00	\$5.00	\$38,981.00
2/22/2019		1B	1	0.096354	\$0.10	\$5.00	\$5.00
3/1/2019		3	2,596.42	0.047512	\$123.36	\$5.00	\$12,982.10
2/21/2019		1B	35.58	0.096354	\$3.43	\$5.00	\$177.90
2/13/2019		1B	3.39	0.096354	\$0.33	\$5.00	\$16.95
2/19/2019		1A	1355	0.096354	\$130.56	\$5.00	\$6,775.00
2/15/2019		1B	9.36	0.096354	\$0.90	\$5.00	\$46.80
3/1/2019		1B	1	0.096354	\$0.10	\$5.00	\$5.00
2/18/2019		3	255.79	0.047512	\$12.15	\$5.00	\$1,278.95
3/5/2019		1B	41.14	0.096354	\$3.96	\$5.00	\$205.70
2/26/2019		1A	6	0.096354	\$0.58	\$5.00	\$30.00
2/26/2019		1A	1	0.096354	\$0.10	\$5.00	\$5.00
2/26/2019		1A	22	0.096354	\$2.12	\$5.00	\$110.00
2/26/2019		1A	329	0.096354	\$31.70	\$5.00	\$1,645.00
2/26/2019		1A	18	0.096354	\$1.73	\$5.00	\$90.00
2/26/2019		1A	1	0.096354	\$0.10	\$5.00	\$5.00
2/26/2019		1A	27.38	0.096354	\$2.64	\$5.00	\$136.90
2/19/2019		3	26	0.047512	\$1.24	\$5.00	\$130.00
2/13/2019		4	21	0.047512	\$1.00	\$5.00	\$105.00
2/27/2019		1B	53	0.096354	\$5.11	\$5.00	\$265.00
2/27/2019		1A	7.09	0.096354	\$0.68	\$5.00	\$35.45
2/27/2019		1B	10.65	0.096354	\$1.03	\$5.00	\$53.25
3/8/2019		3	676	0.047512	\$32.12	\$5.00	\$3,380.00
3/6/2019		1B	1.18	0.096354	\$0.11	\$5.00	\$5.90
2/6/2019		1B	73.99	0.096354	\$7.13	\$5.00	\$369.95
3/8/2019		1A	246	0.096354	\$23.70	\$5.00	\$1,230.00
2/13/2019		1B	1107.21	0.096354	\$106.68	\$5.00	\$5,536.05
3/7/2019		1B	61.43	0.096354	\$5.92	\$5.00	\$307.15
2/19/2019		3	1091	0.047512	\$51.84	\$5.00	\$5,455.00
2/27/2019		1B	2,473.00	0.096354	\$238.28	\$5.00	\$12,365.00
3/4/2019		1B	7.33	0.096354	\$0.71	\$5.00	\$36.65
2/25/2019		1B	2	0.096354	\$0.19	\$5.00	\$10.00
2/15/2019		7	57,472.13	0.043461	\$2,497.80	\$5.00	\$287,360.65
2/21/2019		1B	178	0.096354	\$17.15	\$5.00	\$890.00
2/21/2019		1B	5	0.096354	\$0.48	\$5.00	\$25.00
3/6/2019		1B	27.28	0.096354	\$2.63	\$5.00	\$136.40
2/28/2019		3	2,082.00	0.047512	\$98.92	\$5.00	\$10,410.00
2/26/2019		1B	802.89	0.096354	\$77.36	\$5.00	\$4,014.45
2/22/2019		1A	59.3	0.096354	\$5.71	\$5.00	\$296.50
2/19/2019		1A	21	0.096354	\$2.02	\$5.00	\$105.00
3/1/2019		1A	1647.87	0.096354	\$158.78	\$5.00	\$8,239.35
2/13/2019		1B	1.63	0.047512	\$0.08	\$5.00	\$8.15
2/15/2019		3	3,435.61	0.047512	\$163.23	\$5.00	\$17,178.05
2/22/2019		1B	441	0.096354	\$42.49	\$5.00	\$2,205.00
2/22/2019		1B	21	0.096354	\$2.02	\$5.00	\$105.00
2/21/2019		1A	26	0.096354	\$2.51	\$5.00	\$130.00
2/22/2019		1A	63	0.096354	\$6.07	\$5.00	\$315.00
2/22/2019		1A	127.87	0.096354	\$12.32	\$5.00	\$639.35
2/22/2019		1A	124	0.096354	\$11.95	\$5.00	\$620.00
2/26/2019		3	75.47	0.047512	\$3.59	\$5.00	\$377.35
2/27/2019		1A	401	0.096354	\$38.64	\$5.00	\$2,005.00
2/21/2019		1B	3,917.14	0.096354	\$377.43	\$5.00	\$19,585.70
2/19/2019		3	174.83	0.047512	\$8.31	\$5.00	\$874.15
2/20/2019		F	60	0.047512	\$2.85	\$5.00	\$300.00
2/20/2019		F	880	0.047512	\$41.81	\$5.00	\$4,400.00
[PROTECTED DATA ENDS]							
Total			153,898.15	\$	16,928.44	\$	769,490.75

	Jun-13	Jul-13	Aug-13	Sep-13	Oct-13	Nov-13	Dec-13	Jan-14	Feb-14	Mar-14	Apr-14	May-14	Total
Plant Burn MV900(dkt)	608,913	972,237	975,055	373,120	744,473	1,465,874	1,205,046	658,164	355,719	322,084	497,353	775,188	
NNG Allocated (dkt)	615,576	968,472	966,372	369,206	730,328	1,438,414	1,182,558	642,736	345,882	310,345	484,248	755,481	
Difference Plant Burn vs. NNG Allocation(dkt)	6,663	(3,765)	(8,683)	(3,914)	(14,145)	(27,460)	(22,488)	(15,428)	(9,837)	(11,739)	(13,105)	(19,707)	
Monthly Undertake (\$/dkt)	3.84520	3.68350	3.54620	3.71220	3.80940	3.86410	4.64600	5.31040	8.69600	8.56490	4.82050	4.64970	
Monthly Overtake (\$/dkt)	4.05950	3.89780	3.76050	3.92650	4.02370	4.43630	5.21820	5.88260	9.26820	9.13710	5.03480	4.86400	
Monthly \$ to be allocated	25,621	(14,675)	(32,652)	(15,368)	(56,915)	(121,821)	(117,347)	(90,757)	(91,171)	(107,260)	(65,981)	(95,855)	(784,183)
MN sales allocation % by month	86.04%	87.35%	88.14%	87.25%	87.21%	86.87%	87.03%	88.12%	87.41%	87.31%	87.24%	87.51%	
ND sales allocation % by month	13.96%	12.65%	11.86%	12.75%	12.79%	13.13%	12.97%	11.88%	12.59%	12.69%	12.76%	12.49%	
MN allocated \$ by month	22,044	(12,819)	(28,780)	(13,409)	(49,636)	(105,826)	(102,127)	(79,975)	(79,693)	(93,649)	(57,562)	(83,883)	(685,313)
MN class allocation percentages by month													
Residential	40.61%	38.96%	37.89%	46.64%	50.45%	56.06%	57.32%	56.36%	54.98%	52.10%	47.89%	41.34%	
Commercial Firm	24.72%	23.17%	23.84%	24.28%	26.75%	28.72%	29.55%	30.74%	30.58%	29.33%	27.34%	26.22%	
Demand Billed	7.45%	8.29%	8.20%	6.01%	3.99%	2.86%	2.66%	2.95%	3.07%	3.53%	4.71%	7.30%	
Small Interruptible	4.35%	3.55%	4.24%	3.93%	4.18%	3.72%	3.11%	2.64%	3.87%	3.85%	4.89%	4.48%	
Medium & Large Interruptible	22.88%	26.04%	25.83%	19.15%	14.64%	8.64%	7.36%	7.32%	7.50%	11.18%	15.17%	20.66%	
Total	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	
MN \$ allocated by class by month													
Residential	8,952	(4,994)	(10,906)	(6,253)	(25,039)	(59,329)	(58,540)	(45,073)	(43,814)	(48,794)	(27,569)	(34,674)	(356,033)
Commercial Firm	5,449	(2,970)	(6,861)	(3,256)	(13,275)	(30,391)	(30,181)	(24,580)	(24,368)	(27,469)	(15,736)	(21,998)	(195,637)
Demand Billed	1,641	(1,063)	(2,359)	(805)	(1,978)	(3,027)	(2,716)	(2,360)	(2,449)	(3,310)	(2,711)	(6,120)	(27,257)
Small Interruptible	959	(455)	(1,222)	(527)	(2,077)	(3,936)	(3,171)	(2,108)	(3,085)	(3,604)	(2,815)	(3,759)	(25,800)
Medium & Large Interruptible	5,043	(3,338)	(7,433)	(2,567)	(7,266)	(9,143)	(7,518)	(5,853)	(5,976)	(10,471)	(8,731)	(17,332)	(80,587)
Total	22,044	(12,819)	(28,780)	(13,409)	(49,636)	(105,826)	(102,127)	(79,975)	(79,693)	(93,649)	(57,562)	(83,883)	(685,313)
ND allocated \$ by month	3,577	(1,856)	(3,873)	(1,959)	(7,279)	(15,995)	(15,220)	(10,782)	(11,478)	(13,611)	(8,419)	(11,972)	(98,869)
ND class allocation percentages by month													
Residential	16.24%	17.57%	17.68%	30.29%	32.94%	34.88%	38.34%	38.63%	36.62%	35.68%	30.31%	23.99%	
Commercial/Industrial	35.73%	38.57%	43.15%	43.05%	46.06%	49.78%	45.30%	51.24%	47.37%	46.42%	42.37%	43.73%	
Small Interruptible	8.75%	10.37%	11.52%	11.34%	6.31%	5.16%	4.46%	6.20%	6.12%	6.12%	8.25%	10.27%	
Large Interruptible	39.29%	33.49%	27.65%	15.33%	14.69%	10.18%	11.90%	6.14%	9.81%	11.78%	19.08%	22.01%	
Total	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	
ND \$ allocated by class by month													
Residential	581	(326)	(685)	(594)	(2,398)	(5,580)	(5,835)	(4,165)	(4,203)	(4,857)	(2,552)	(2,872)	(33,485)
Commercial/Industrial	1,278	(716)	(1,671)	(843)	(3,353)	(7,962)	(6,894)	(5,525)	(5,437)	(6,318)	(3,567)	(5,236)	(46,244)
Small Interruptible	313	(193)	(446)	(222)	(460)	(825)	(679)	(430)	(712)	(832)	(694)	(1,229)	(6,411)
Large Interruptible	1,405	(622)	(1,071)	(300)	(1,070)	(1,628)	(1,811)	(662)	(1,126)	(1,604)	(1,606)	(2,635)	(12,729)
Total	3,577	(1,856)	(3,873)	(1,959)	(7,279)	(15,995)	(15,220)	(10,782)	(11,478)	(13,611)	(8,419)	(11,972)	(98,869)

	Jun-14	Jul-14	Aug-14	Sep-14	Oct-14	Nov-14	Dec-14	Jan-15	Feb-15	Mar-15	Apr-15	May-15	Total
Plant Burn MV90(dkt)	694,115	301,622	779,939	312,161	1,220,149	541,272	1,043,855	709,912	775,217	1,745,658	1,225,923	412,609	
NNG Allocated (dkt)	655,254	300,330	751,782	301,862	1,182,275	521,838	1,009,120	685,056	729,851	1,736,947	1,178,569	392,994	
Difference Plant Burn vs. NNG Allocation(dkt)	(38,861)	(1,292)	(28,157)	(10,299)	(37,874)	(19,434)	(34,735)	(24,856)	(45,366)	(8,711)	(47,354)	(19,615)	
Monthly Undertake (\$/dkt)	4.71070	4.16900	3.99010	4.02870	3.91290	4.35500	3.73500	3.15460	3.70040	2.80090	2.53870	2.80600	
Monthly Overtake (\$/dkt)	4.92500	4.38330	4.20440	4.24300	4.12720	4.92720	4.30720	3.72680	4.27260	3.37310	2.75300	3.02030	
Monthly \$ to be allocated	(191,390)	(5,663)	(118,383)	(43,699)	(156,314)	(95,755)	(149,611)	(92,633)	(193,831)	(29,383)	(130,366)	(59,243)	(1,266,271)
MN sales allocation % by month	86.54%	86.30%	86.43%	86.90%	86.96%	86.69%	86.60%	86.80%	87.20%	87.18%	86.72%	86.02%	
ND sales allocation % by month	13.46%	13.70%	13.57%	13.10%	13.04%	13.31%	13.40%	13.20%	12.80%	12.82%	13.28%	13.98%	
MN allocated \$ by month	(165,629)	(4,887)	(102,319)	(37,974)	(135,930)	(83,010)	(129,563)	(80,406)	(169,020)	(25,616)	(113,053)	(50,961)	(1,098,369)
MN class allocation percentages by month													
Residential	37.67%	35.76%	40.01%	48.32%	50.12%	55.34%	56.07%	54.37%	54.82%	50.81%	43.59%	44.21%	
Commercial Firm	22.44%	21.98%	24.13%	25.53%	27.01%	28.81%	30.04%	30.25%	30.35%	28.98%	27.59%	26.25%	
Demand Billed	8.28%	8.70%	8.46%	5.85%	4.16%	3.06%	2.90%	3.27%	3.02%	4.18%	6.18%	7.51%	
Small Interruptible	3.64%	3.52%	4.21%	3.80%	3.43%	3.98%	3.38%	3.42%	3.70%	4.39%	4.46%	4.16%	
Medium & Large Interruptible	27.96%	30.04%	23.19%	16.49%	15.27%	8.81%	7.62%	8.69%	8.09%	11.65%	18.18%	17.87%	
Total	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	
MN \$ allocated by class by month													
Residential	(62,387)	(1,748)	(40,941)	(18,349)	(68,129)	(45,937)	(72,646)	(43,718)	(92,664)	(13,015)	(49,279)	(22,528)	(531,340)
Commercial Firm	(37,170)	(1,074)	(24,687)	(9,696)	(36,718)	(23,919)	(38,916)	(24,319)	(51,301)	(7,423)	(31,193)	(13,377)	(299,793)
Demand Billed	(13,721)	(425)	(8,653)	(2,221)	(5,654)	(2,541)	(3,754)	(2,628)	(5,113)	(1,070)	(6,988)	(3,828)	(56,595)
Small Interruptible	(6,034)	(172)	(4,310)	(1,443)	(4,668)	(3,300)	(4,379)	(2,753)	(6,261)	(1,125)	(5,041)	(2,121)	(41,608)
Medium & Large Interruptible	(46,317)	(1,468)	(23,728)	(6,264)	(20,761)	(7,312)	(9,868)	(6,987)	(13,681)	(2,983)	(20,553)	(9,108)	(169,032)
Total	(165,629)	(4,887)	(102,319)	(37,974)	(135,930)	(83,010)	(129,563)	(80,406)	(169,020)	(25,616)	(113,053)	(50,961)	(1,098,369)
ND allocated \$ by month	(25,761)	(776)	(16,065)	(5,725)	(20,383)	(12,745)	(20,048)	(12,228)	(24,810)	(3,767)	(17,313)	(8,282)	(167,902)
ND class allocation percentages by month													
Residential	16.39%	14.32%	17.84%	26.78%	28.57%	35.75%	36.16%	36.32%	35.42%	33.82%	28.18%	25.17%	
Commercial/Industrial	37.98%	38.76%	42.61%	40.96%	46.38%	47.09%	48.36%	48.73%	48.66%	46.70%	45.24%	44.09%	
Small Interruptible	9.20%	8.27%	8.99%	10.24%	6.14%	4.68%	4.88%	5.40%	4.77%	7.23%	8.38%	9.24%	
Large Interruptible	36.43%	38.65%	30.55%	22.02%	18.91%	12.48%	10.60%	9.55%	11.15%	12.26%	18.20%	21.51%	
Total	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	
ND \$ allocated by class by month													
Residential	(4,222)	(111)	(2,866)	(1,533)	(5,824)	(4,556)	(7,249)	(4,441)	(8,787)	(1,274)	(4,879)	(2,084)	(47,826)
Commercial/Industrial	(9,784)	(301)	(6,846)	(2,345)	(9,454)	(6,002)	(9,696)	(5,959)	(12,072)	(1,759)	(7,832)	(3,651)	(75,701)
Small Interruptible	(2,369)	(64)	(1,444)	(586)	(1,251)	(597)	(979)	(661)	(1,185)	(272)	(1,452)	(765)	(11,625)
Large Interruptible	(9,385)	(300)	(4,908)	(1,261)	(3,854)	(1,590)	(2,124)	(1,168)	(2,767)	(462)	(3,150)	(1,781)	(32,750)
Total	(25,761)	(776)	(16,065)	(5,725)	(20,383)	(12,745)	(20,048)	(12,228)	(24,810)	(3,767)	(17,313)	(8,282)	(167,902)

	Jun-15	Jul-15	Aug-15	Sep-15	Oct-15	Nov-15	Dec-15	Jan-16	Feb-16	Mar-16	Apr-16	May-16	Total
Plant Burn MV900(dkt)	1,084,395	1,484,096	1,151,413	1,337,958	832,907	1,102,029	1,802,773	1,449,349	1,119,792	1,831,150	1,452,007	1,045,158	
NNG Allocated (dkt)	1,037,091	1,520,401	1,116,785	1,291,202	797,752	1,045,358	1,727,215	1,393,378	1,089,930	1,766,837	1,440,633	1,005,670	
Difference Plant Burn vs. NNG Allocation(dkt)	(47,304)	36,305	(34,628)	(46,756)	(35,155)	(56,671)	(75,558)	(55,971)	(29,862)	(64,313)	(11,374)	(39,488)	
Monthly Undertake (\$/dkt)	2.70640	2.88430	2.85170	2.72260	2.42690	2.17580	2.06000	2.40150	2.00810	1.75810	1.89330	1.91160	
Monthly Overtake (\$/dkt)	2.92070	3.09860	3.06600	2.93690	2.64120	2.74800	2.63220	2.97370	2.58030	2.33030	2.10760	2.12590	
Monthly \$ to be allocated	(138,161)	104,715	(106,169)	(137,318)	(92,851)	(155,732)	(198,884)	(166,441)	(77,053)	(149,869)	(23,972)	(83,948)	(1,225,682)
MN sales allocation % by month	87.71%	87.41%	86.56%	86.12%	86.45%	86.51%	86.14%	87.94%	87.35%	86.73%	86.29%	85.15%	
ND sales allocation % by month	12.29%	12.59%	13.44%	13.88%	13.55%	13.49%	13.86%	12.06%	12.65%	13.27%	13.71%	14.85%	
MN allocated \$ by month	(121,181)	91,531	(91,900)	(118,258)	(80,270)	(134,724)	(171,318)	(146,368)	(67,306)	(129,981)	(20,685)	(71,481)	(1,061,942)
MN class allocation percentages by month													
Residential	38.64%	36.45%	38.30%	42.81%	46.93%	54.51%	55.54%	52.75%	52.93%	51.19%	45.63%	43.02%	
Commercial Firm	23.84%	23.32%	23.99%	24.76%	27.29%	28.93%	29.39%	29.74%	30.03%	28.65%	28.71%	26.19%	
Demand Billed	9.26%	8.88%	9.04%	6.93%	4.96%	3.45%	3.12%	2.97%	3.36%	4.31%	5.24%	7.43%	
Small Interruptible	4.10%	4.05%	3.93%	3.66%	3.73%	3.81%	3.44%	3.14%	3.64%	3.59%	4.03%	4.01%	
Medium & Large Interruptible	24.17%	27.30%	24.74%	21.85%	17.09%	9.30%	8.52%	11.40%	10.03%	12.26%	16.38%	19.36%	
Total	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	
MN \$ allocated by class by month													
Residential	(46,828)	33,364	(35,193)	(50,621)	(37,671)	(73,440)	(95,142)	(77,205)	(35,627)	(66,533)	(9,439)	(30,755)	(525,091)
Commercial Firm	(28,888)	21,346	(22,051)	(29,281)	(21,903)	(38,977)	(50,348)	(43,533)	(20,215)	(37,245)	(5,940)	(18,718)	(295,753)
Demand Billed	(11,215)	8,124	(8,309)	(8,190)	(3,982)	(4,642)	(5,344)	(4,346)	(2,262)	(5,600)	(1,084)	(5,309)	(52,161)
Small Interruptible	(4,964)	3,711	(3,614)	(4,327)	(2,996)	(5,129)	(5,886)	(4,599)	(2,450)	(4,672)	(833)	(2,864)	(38,623)
Medium & Large Interruptible	(29,285)	24,987	(22,732)	(25,839)	(13,718)	(12,536)	(14,598)	(16,685)	(6,751)	(15,932)	(3,389)	(13,835)	(150,314)
Total	(121,181)	91,531	(91,900)	(118,258)	(80,270)	(134,724)	(171,318)	(146,368)	(67,306)	(129,981)	(20,685)	(71,481)	(1,061,942)
ND allocated \$ by month	(16,980)	13,184	(14,269)	(19,060)	(12,581)	(21,008)	(27,565)	(20,073)	(9,747)	(19,888)	(3,287)	(12,466)	(163,740)
ND class allocation percentages by month													
Residential	18.93%	16.76%	16.70%	22.52%	28.90%	35.43%	36.21%	37.60%	35.54%	33.34%	27.20%	17.69%	
Commercial/Industrial	44.58%	43.96%	41.69%	39.79%	45.11%	47.29%	48.26%	47.79%	46.48%	47.27%	44.05%	38.36%	
Small Interruptible	10.33%	10.30%	9.40%	7.45%	5.82%	6.04%	4.55%	5.52%	6.02%	6.17%	6.93%	8.01%	
Large Interruptible	26.16%	28.98%	32.21%	30.24%	20.17%	11.24%	10.98%	9.09%	11.95%	13.22%	21.81%	35.95%	
Total	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	
ND \$ allocated by class by month													
Residential	(3,214)	2,209	(2,383)	(4,292)	(3,636)	(7,443)	(9,981)	(7,547)	(3,464)	(6,631)	(894)	(2,205)	(49,482)
Commercial/Industrial	(7,570)	5,796	(5,949)	(7,584)	(5,676)	(9,936)	(13,303)	(9,592)	(4,531)	(9,401)	(1,448)	(4,782)	(73,976)
Small Interruptible	(1,754)	1,358	(1,341)	(1,420)	(732)	(1,268)	(1,253)	(1,108)	(587)	(1,227)	(228)	(998)	(10,559)
Large Interruptible	(4,442)	3,821	(4,595)	(5,763)	(2,538)	(2,361)	(3,027)	(1,825)	(1,165)	(2,629)	(717)	(4,481)	(29,723)
Total	(16,980)	13,184	(14,269)	(19,060)	(12,581)	(21,008)	(27,565)	(20,073)	(9,747)	(19,888)	(3,287)	(12,466)	(163,740)

	Jun-16	Jul-16	Aug-16	Sep-16	Oct-16	Nov-16	Dec-16	Jan-17	Feb-17	Mar-17	Apr-17	May-17	Total
Plant Burn MV90(dkt)	1,202,098	1,679,229	1,928,103	680,891	823,827	1,066,858	645,097	1,366,960	598,294	1,593,946	973,786	1,314,410	
NNG Allocated (dkt)	1,154,739	1,631,809	1,860,447	660,084	791,682	1,049,799	622,483	1,321,951	581,452	1,589,494	1,007,914	1,302,081	
Difference Plant Burn vs. NNG Allocation(dkt)	(47,359)	(47,420)	(67,656)	(20,807)	(32,145)	(17,059)	(22,614)	(45,009)	(16,842)	(4,452)	34,128	(12,329)	
Monthly Undertake (\$/dkt)	2.44470	2.68270	2.78020	2.87360	2.86250	2.50360	3.64950	3.33490	2.72570	2.76080	2.93530	2.95040	
Monthly Overtake (\$/dkt)	2.65900	2.89700	2.99450	3.08790	3.07680	3.09330	4.23920	3.92460	3.31540	3.35050	3.15020	3.16530	
Monthly \$ to be allocated	(125,928)	(137,376)	(202,596)	(64,250)	(98,904)	(52,769)	(95,865)	(176,642)	(55,838)	(14,916)	100,176	(39,025)	(963,933)
MN sales allocation % by month	84.85%	85.17%	84.51%	84.73%	85.64%	86.42%	86.62%	86.65%	85.79%	87.15%	86.59%	85.45%	
ND sales allocation % by month	15.15%	14.83%	15.49%	15.27%	14.36%	13.58%	13.38%	13.35%	14.21%	12.85%	13.41%	14.55%	
MN allocated \$ by month	(106,850)	(117,003)	(171,214)	(54,439)	(84,701)	(45,603)	(83,038)	(153,061)	(47,903)	(13,000)	86,742	(33,347)	(823,416)
MN class allocation percentages by month													
Residential	36.64%	37.37%	38.22%	42.87%	46.77%	54.39%	56.05%	53.43%	53.90%	49.06%	47.37%	41.45%	
Commercial Firm	23.53%	23.34%	24.49%	25.74%	27.02%	29.95%	30.54%	30.66%	31.03%	29.55%	29.33%	25.54%	
Demand Billed	8.59%	7.77%	8.59%	6.68%	5.22%	2.98%	2.84%	3.96%	3.11%	4.08%	4.76%	7.52%	
Small Interruptible	3.47%	3.50%	3.71%	3.26%	3.86%	3.36%	2.87%	3.12%	3.30%	3.45%	3.73%	4.33%	
Medium & Large Interruptible	27.77%	28.01%	24.99%	21.45%	17.14%	9.32%	7.70%	8.83%	8.66%	13.86%	14.80%	21.15%	
Total	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	
MN \$ allocated by class by month													
Residential	(39,146)	(43,726)	(65,430)	(23,338)	(39,613)	(24,804)	(46,543)	(81,774)	(25,820)	(6,377)	41,092	(13,823)	(369,302)
Commercial Firm	(25,144)	(27,310)	(41,930)	(14,012)	(22,885)	(13,659)	(25,360)	(46,929)	(14,863)	(3,842)	25,438	(8,518)	(219,014)
Demand Billed	(9,179)	(9,095)	(14,703)	(3,639)	(4,423)	(1,358)	(2,355)	(6,058)	(1,492)	(530)	4,131	(2,507)	(51,209)
Small Interruptible	(3,710)	(4,096)	(6,358)	(1,776)	(3,266)	(1,531)	(2,383)	(4,778)	(1,579)	(449)	3,240	(1,445)	(28,132)
Medium & Large Interruptible	(29,670)	(32,776)	(42,793)	(11,675)	(14,514)	(4,250)	(6,397)	(13,521)	(4,149)	(1,802)	12,841	(7,054)	(155,759)
Total	(106,850)	(117,003)	(171,214)	(54,439)	(84,701)	(45,603)	(83,038)	(153,061)	(47,903)	(13,000)	86,742	(33,347)	(823,416)
ND allocated \$ by month	(19,078)	(20,373)	(31,382)	(9,811)	(14,203)	(7,166)	(12,827)	(23,582)	(7,935)	(1,917)	13,434	(5,678)	(140,517)
ND class allocation percentages by month													
Residential	12.78%	14.59%	14.52%	24.08%	27.39%	32.68%	37.89%	36.76%	35.64%	33.29%	29.40%	19.64%	
Commercial/Industrial	36.75%	35.98%	39.52%	43.13%	43.87%	52.35%	47.45%	47.86%	48.56%	46.24%	46.59%	39.71%	
Small Interruptible	7.80%	8.71%	7.65%	7.24%	7.29%	4.70%	4.46%	4.91%	5.89%	6.01%	7.50%	8.83%	
Large Interruptible	42.67%	40.72%	38.31%	25.55%	21.45%	10.27%	10.21%	10.46%	9.91%	14.46%	16.51%	31.82%	
Total	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	
ND \$ allocated by class by month													
Residential	(2,439)	(2,972)	(4,557)	(2,363)	(3,890)	(2,342)	(4,860)	(8,669)	(2,828)	(638)	3,949	(1,115)	(32,723)
Commercial/Industrial	(7,011)	(7,330)	(12,402)	(4,231)	(6,230)	(3,752)	(6,086)	(11,287)	(3,853)	(886)	6,259	(2,255)	(59,065)
Small Interruptible	(1,488)	(1,774)	(2,401)	(710)	(1,036)	(337)	(572)	(1,158)	(467)	(115)	1,008	(501)	(9,552)
Large Interruptible	(8,140)	(8,297)	(12,021)	(2,507)	(3,047)	(736)	(1,309)	(2,467)	(786)	(277)	2,218	(1,807)	(39,177)
Total	(19,078)	(20,373)	(31,382)	(9,811)	(14,203)	(7,166)	(12,827)	(23,582)	(7,935)	(1,917)	13,434	(5,678)	(140,517)

	Jun-17	Jul-17	Aug-17	Sep-17	Oct-17	Nov-17	Dec-17	Jan-18	Feb-18	Mar-18	Apr-18	May-18	Total
Plant Burn MV90(dkt)	1,188,013	1,532,449	906,178	920,716	809,735	1,000,259	1,615,624	1,545,010	1,224,939	1,657,322	1,485,689	1,812,779	
NNG Allocated (dkt)	1,167,971	1,486,537	868,376	882,137	774,085	956,327	1,548,487	1,488,033	1,178,326	1,598,494	1,435,098	1,758,552	
Difference Plant Burn vs. NNG Allocation(dkt)	(20,042)	(45,912)	(37,802)	(38,579)	(35,650)	(43,932)	(67,137)	(56,977)	(46,613)	(58,828)	(50,591)	(54,227)	
Monthly Undertake (\$/dkt)	2.73020	2.71210	2.76540	2.81770	2.78070	2.93360	2.80120	3.65720	2.58290	2.45350	2.55100	2.42280	
Monthly Overtake (\$/dkt)	2.94510	2.92700	2.98030	3.03260	2.99560	3.52390	3.39150	4.24750	3.17320	3.04380	2.76530	2.63710	
Monthly \$ to be allocated	(59,026)	(134,384)	(112,661)	(116,995)	(106,793)	(154,812)	(227,695)	(242,010)	(147,912)	(179,061)	(139,899)	(143,002)	(1,764,250)
MN sales allocation % by month	84.45%	84.07%	84.04%	83.85%	85.68%	86.44%	86.86%	86.33%	86.05%	87.35%	86.56%	84.25%	
ND sales allocation % by month	15.55%	15.93%	15.96%	16.15%	14.32%	13.56%	13.14%	13.67%	13.95%	12.65%	13.44%	15.75%	
MN allocated \$ by month	(49,847)	(112,977)	(94,681)	(98,100)	(91,500)	(133,819)	(197,776)	(208,927)	(127,279)	(156,409)	(121,097)	(120,479)	(1,512,892)
MN class allocation percentages by month													
Residential	36.94%	37.92%	36.49%	43.90%	53.20%	52.05%	57.02%	53.82%	53.32%	52.86%	44.91%	38.53%	
Commercial Firm	25.17%	23.97%	23.94%	26.61%	28.11%	30.21%	30.81%	31.15%	31.29%	30.89%	30.14%	25.18%	
Demand Billed	7.57%	8.38%	8.05%	6.22%	4.03%	3.48%	2.82%	3.09%	3.52%	4.02%	5.02%	8.06%	
Small Interruptible	3.41%	3.61%	3.56%	3.50%	3.05%	3.33%	2.24%	2.78%	3.03%	2.85%	4.25%	3.50%	
Medium & Large Interruptible	26.91%	26.11%	27.95%	19.77%	11.61%	10.93%	7.11%	9.17%	8.85%	9.38%	15.68%	24.73%	
Total	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	
MN \$ allocated by class by month													
Residential	(18,415)	(42,842)	(34,552)	(43,064)	(48,676)	(69,656)	(112,771)	(112,442)	(67,861)	(82,677)	(54,389)	(46,415)	(733,759)
Commercial Firm	(12,544)	(27,086)	(22,671)	(26,108)	(25,718)	(40,426)	(60,931)	(65,072)	(39,826)	(48,322)	(36,500)	(30,339)	(435,543)
Demand Billed	(3,775)	(9,465)	(7,619)	(6,098)	(3,692)	(4,652)	(5,587)	(6,455)	(4,474)	(6,280)	(6,075)	(9,714)	(73,886)
Small Interruptible	(1,698)	(4,082)	(3,374)	(3,438)	(2,792)	(4,462)	(4,429)	(5,799)	(3,857)	(4,456)	(5,148)	(4,221)	(47,758)
Medium & Large Interruptible	(13,415)	(29,501)	(26,464)	(19,393)	(10,622)	(14,623)	(14,058)	(19,159)	(11,260)	(14,675)	(18,985)	(29,790)	(221,946)
Total	(49,847)	(112,977)	(94,681)	(98,100)	(91,500)	(133,819)	(197,776)	(208,927)	(127,279)	(156,409)	(121,097)	(120,479)	(1,512,892)
ND allocated \$ by month	(9,178)	(21,407)	(17,981)	(18,895)	(15,293)	(20,993)	(29,919)	(33,083)	(20,634)	(22,651)	(18,802)	(22,523)	(251,359)
ND class allocation percentages by month													
Residential	13.04%	13.58%	13.01%	23.56%	33.04%	32.71%	38.66%	37.36%	34.56%	36.14%	27.22%	22.02%	
Commercial/Industrial	38.08%	37.06%	43.19%	41.74%	45.92%	49.47%	45.72%	49.40%	46.49%	49.72%	43.64%	44.69%	
Small Interruptible	8.94%	8.13%	8.26%	7.56%	5.21%	5.24%	3.34%	3.11%	6.20%	3.89%	8.13%	7.64%	
Large Interruptible	39.94%	41.24%	35.54%	27.14%	15.83%	12.58%	12.28%	10.13%	12.75%	10.25%	21.02%	25.65%	
Total	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	
ND \$ allocated by class by month													
Residential	(1,197)	(2,906)	(2,339)	(4,452)	(5,053)	(6,867)	(11,567)	(12,359)	(7,131)	(8,187)	(5,118)	(4,959)	(72,135)
Commercial/Industrial	(3,495)	(7,933)	(7,766)	(7,887)	(7,022)	(10,386)	(13,678)	(16,344)	(9,593)	(11,262)	(8,205)	(10,065)	(113,634)
Small Interruptible	(821)	(1,740)	(1,485)	(1,429)	(797)	(1,100)	(1,001)	(1,029)	(1,279)	(882)	(1,528)	(1,722)	(14,812)
Large Interruptible	(3,665)	(8,829)	(6,391)	(5,127)	(2,421)	(2,640)	(3,673)	(3,351)	(2,630)	(2,321)	(3,952)	(5,777)	(50,778)
Total	(9,178)	(21,407)	(17,981)	(18,895)	(15,293)	(20,993)	(29,919)	(33,083)	(20,634)	(22,651)	(18,802)	(22,523)	(251,359)

CERTIFICATE OF SERVICE

I, Lynnette Sweet, hereby certify that I have this day served copies or summaries of the foregoing document on the attached list of persons.

xx by depositing a true and correct copy thereof, properly enveloped with postage paid in the United States Mail at Minneapolis, Minnesota

xx electronic filing

DOCKET NOS. G999/AA-18-374
G002/AA-18-572

Dated this 6th day of May 2019

/s/

Lynnette Sweet
Regulatory Administrator

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Tamie A.	Aberle	tamie.aberle@mdu.com	Great Plains Natural Gas Co.	400 North Fourth Street Bismarck, ND 585014092	Electronic Service	No	OFF_SL_18-374_AA-18-374
Kristine	Anderson	kanderson@greatermngas.com	Greater Minnesota Gas, Inc.	202 S. Main Street Le Sueur, MN 56058	Electronic Service	No	OFF_SL_18-374_AA-18-374
Steven	Clay	Steven.Clay@CenterPoint Energy.com	CenterPoint Energy Minnesota Gas	505 Nicollet Mall Minneapolis, MN 55402	Electronic Service	No	OFF_SL_18-374_AA-18-374
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_18-374_AA-18-374
Seth	DeMerritt	Seth.DeMerritt@wecenergygroup.com	MERC (Holding)	700 North Adams PO Box 19001 Green Bay, WI 543079001	Electronic Service	No	OFF_SL_18-374_AA-18-374
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	Yes	OFF_SL_18-374_AA-18-374
Marie	Doyle	marie.doyle@centerpointenergy.com	CenterPoint Energy	505 Nicollet Mall P O Box 59038 Minneapolis, MN 554590038	Electronic Service	No	OFF_SL_18-374_AA-18-374
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_18-374_AA-18-374
Brian	Gardow	bgardow@greatermngas.com	Greater Minnesota Gas, Inc.	PO Box 68 Le Sueur, MN 56058	Electronic Service	No	OFF_SL_18-374_AA-18-374
Nicolle	Kupser	nkupser@greatermngas.com	Greater Minnesota Gas, Inc.	202 South Main Street P.O. Box 68 Le Sueur, MN 56058	Electronic Service	No	OFF_SL_18-374_AA-18-374

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Greg	Palmer	gpalmer@greatermngas.com	Greater Minnesota Gas, Inc.	PO Box 68 202 South Main Street Le Sueur, MN 56058	Electronic Service	No	OFF_SL_18-374_AA-18-374
Lisa	Peterson	lisa.r.peterson@xcelenergy.com		Xcel Energy 414 Nicollet Mall - 7th Floor Minneapolis, MN 55401	Electronic Service	No	OFF_SL_18-374_AA-18-374
Catherine	Phillips	catherine.phillips@we-energies.com	We Energies	231 West Michigan St Milwaukee, WI 53203	Electronic Service	No	OFF_SL_18-374_AA-18-374
Peggy	Sorum	peggy.sorum@centerpointenergy.com	CenterPoint Energy	505 Nicollet Mall Minneapolis, MN 55402	Electronic Service	No	OFF_SL_18-374_AA-18-374
Lynnette	Sweet	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_18-374_AA-18-374
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_18-374_AA-18-374
Mary	Wolter	mary.wolter@wecenergygroup.com	Minnesota Energy Resources Corporation (HOLDING)	231 West Michigan St Milwaukee, WI 53203	Electronic Service	No	OFF_SL_18-374_AA-18-374

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Tamie A.	Aberle	tamie.aberle@mdu.com	Great Plains Natural Gas Co.	400 North Fourth Street Bismarck, ND 585014092	Electronic Service	No	OFF_SL_18-572_AA-18-572
Christopher	Anderson	canderson@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022191	Electronic Service	No	OFF_SL_18-572_AA-18-572
Kristine	Anderson	kanderson@greatermngas.com	Greater Minnesota Gas, Inc.	202 S. Main Street Le Sueur, MN 56058	Electronic Service	No	OFF_SL_18-572_AA-18-572
Gail	Baranko	gail.baranko@xcelenergy.com	Xcel Energy	414 Nicollet Mall7th Floor Minneapolis, MN 55401	Electronic Service	No	OFF_SL_18-572_AA-18-572
Robert S.	Carney, Jr.			4232 Colfax Ave. S. Minneapolis, MN 55409	Paper Service	No	OFF_SL_18-572_AA-18-572
Steven	Clay	Steven.Clay@CenterPointEnergy.com	CenterPoint Energy Minnesota Gas	505 Nicollet Mall Minneapolis, MN 55402	Electronic Service	No	OFF_SL_18-572_AA-18-572
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_18-572_AA-18-572
George	Crocker	gwilc@nawo.org	North American Water Office	PO Box 174 Lake Elmo, MN 55042	Electronic Service	No	OFF_SL_18-572_AA-18-572
Seth	DeMerritt	Seth.DeMerritt@wecenergygroup.com	MERC (Holding)	700 North Adams PO Box 19001 Green Bay, WI 543079001	Electronic Service	No	OFF_SL_18-572_AA-18-572
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	Yes	OFF_SL_18-572_AA-18-572

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Marie	Doyle	marie.doyle@centerpointenergy.com	CenterPoint Energy	505 Nicollet Mall P O Box 59038 Minneapolis, MN 554590038	Electronic Service	No	OFF_SL_18-572_AA-18-572
Rebecca	Eilers	rebecca.d.eilers@xcelenergy.com	Xcel Energy	414 Nicollet Mall - 401 7th Floor Minneapolis, MN 55401	Electronic Service	No	OFF_SL_18-572_AA-18-572
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_18-572_AA-18-572
Brian	Gardow	bgardow@greatermngas.com	Greater Minnesota Gas, Inc.	PO Box 68 Le Sueur, MN 56058	Electronic Service	No	OFF_SL_18-572_AA-18-572
Edward	Garvey	garveyed@aol.com	Residence	32 Lawton St Saint Paul, MN 55102	Electronic Service	No	OFF_SL_18-572_AA-18-572
Annete	Henkel	mui@mutilityinvestors.org	Minnesota Utility Investors	413 Wacouta Street #230 St.Paul, MN 55101	Electronic Service	No	OFF_SL_18-572_AA-18-572
Michael	Hoppe	il23@mtn.org	Local Union 23, I.B.E.W.	932 Payne Avenue St. Paul, MN 55130	Electronic Service	No	OFF_SL_18-572_AA-18-572
Richard	Johnson	Rick.Johnson@lawmoss.com	Moss & Barnett	150 S. 5th Street Suite 1200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_18-572_AA-18-572
Nicolle	Kupser	nkupser@greatermngas.com	Greater Minnesota Gas, Inc.	202 South Main Street P.O. Box 68 Le Sueur, MN 56058	Electronic Service	No	OFF_SL_18-572_AA-18-572
Eric	Lipman	eric.lipman@state.mn.us	Office of Administrative Hearings	PO Box 64620 St. Paul, MN 551640620	Electronic Service	Yes	OFF_SL_18-572_AA-18-572

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Pam	Marshall	pam@energycents.org	Energy CENTS Coalition	823 7th St E St. Paul, MN 55106	Electronic Service	No	OFF_SL_18-572_AA-18-572
Mary	Martinka	mary.a.martinka@xcelenergy.com	Xcel Energy Inc	414 Nicollet Mall 7th Floor Minneapolis, MN 55401	Electronic Service	No	OFF_SL_18-572_AA-18-572
David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022093	Electronic Service	No	OFF_SL_18-572_AA-18-572
Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP	33 South Sixth St Ste 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_18-572_AA-18-572
David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency	220 South Sixth Street Suite 1300 Minneapolis, Minnesota 55402	Electronic Service	No	OFF_SL_18-572_AA-18-572
Samantha	Norris	samanthanorris@alliantenergy.com	Interstate Power and Light Company	200 1st Street SE PO Box 351 Cedar Rapids, IA 524060351	Electronic Service	No	OFF_SL_18-572_AA-18-572
Greg	Palmer	gpalmer@greatermngas.com	Greater Minnesota Gas, Inc.	PO Box 68 202 South Main Street Le Sueur, MN 56058	Electronic Service	No	OFF_SL_18-572_AA-18-572
Lisa	Peterson	lisa.r.peterson@xcelenergy.com		Xcel Energy 414 Nicollet Mall - 7th Floor Minneapolis, MN 55401	Electronic Service	No	OFF_SL_18-572_AA-18-572
Catherine	Phillips	catherine.phillips@we-energies.com	We Energies	231 West Michigan St Milwaukee, WI 53203	Electronic Service	No	OFF_SL_18-572_AA-18-572

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Richard	Savelkoul	rsavelkoul@martinsquires.com	Martin & Squires, P.A.	332 Minnesota Street Ste W2750 St. Paul, MN 55101	Electronic Service	No	OFF_SL_18-572_AA-18-572
Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates	7400 Lyndale Ave S Ste 190 Richfield, MN 55423	Electronic Service	No	OFF_SL_18-572_AA-18-572
Peggy	Sorum	peggy.sorum@centerpointenergy.com	CenterPoint Energy	505 Nicollet Mall Minneapolis, MN 55402	Electronic Service	No	OFF_SL_18-572_AA-18-572
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_18-572_AA-18-572
Lynnette	Sweet	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_18-572_AA-18-572
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_18-572_AA-18-572
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_18-572_AA-18-572
Mary	Wolter	mary.wolter@wecenergygroup.com	Minnesota Energy Resources Corporation (HOLDING)	231 West Michigan St Milwaukee, WI 53203	Electronic Service	No	OFF_SL_18-572_AA-18-572