505 Nicollet Mall
P.O. Box 59038
Minneapolis, MN 55459-0038

May 10, 2019

Mr. Daniel Wolf
Executive Secretary
Minnesota Public Utilities Commission
350 Metro Square Building
121 East Seventh Place, Suite 350
St. Paul, Minnesota 55101-2147

RE: In the Matter of Report on the 2017-2018 (FYE18) Annual Automatic Adjustment (AAA) Reports and 2017-2018 Annual Purchased Gas Adjustment (PGA) True-up Filings - CenterPoint Energy
Reply Comments
Docket No. G999/AA-18-374 and G-008/AA-18-573

Dear Mr. Wolf:

CenterPoint Energy submits its reply comments to the review of the 2017-2018 Annual Automatic Adjustment Reports by the Minnesota Department of Commerce (Department or DOC) dated April 25, 2019.

CenterPoint Energy thanks the Department for its thorough review of the Company's True-up and AAA filings and agrees with the Department's recommendation to accept the true-up related to the 2017-2018 gas year and allow the Company to implement its True-Up billing factors. CenterPoint Energy has included additional information requested by the Department and supplemental information required to clarify the Gas Costs detailed in the true-up filing.

If you have any questions regarding the information provided in this filing, please contact me at (612) 321-5078 or Marie.Doyle@CenterPointEnergy.com.
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Sincerely,

/s/

Marie M. Doyle
Rates Analyst
CenterPoint Energy

STATE OF MINNESOTA
BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION
121 Seventh Place East, Suite 350
St. Paul, MN 55101-2147

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

Docket No. G-999/AA-18-374
G-008/AA-18-573

In the Matter of Report on the 2017-2018 (FYE18) Annual Automatic Adjustment (AAA) Reports and 2017-2018 Annual Purchased Gas Adjustment (PGA) True-up Filings - CenterPoint Energy

REPLY COMMENTS

INTRODUCTION

CenterPoint Energy Resources Corp., d/b/a CenterPoint Energy Minnesota Gas submits Reply Comments to address additional information requested by the Department, to address information requested in the Commission's February 27, 2019 Order in Docket No. G-999/AA-17-493, and to explain in greater detail the Company's demand costs issued noted by letter on April 24, 2019 in the present docket.

Item 1:
The Department requests that MERC and CenterPoint provide in *Reply Comments* a discussion of the treatment of its gas losses due to damages (*i.e.*, how the cost of gas lost is collected from third parties and credited back to Firm customers) for each PGA system.

In Ordering Point #24 in the April 3, 2012 MPUC Order in Docket No. G-999/AA-10-885, the Minnesota gas utilities were required to meet with the Department and set reporting requirements going forward. The utilities that bill for gas lost because of contractor damage and remove the commodity gas costs collected from the contractor for the gas costs charged to ratepayers have provided that information in the Annual Automatic Adjustment

Reports since the filing of the 2010-2011 AAA Report (Docket No. G-999/AA-11-793) that would specify the total amount of estimated cost of gas lost as a result of contractor hits to mains that were paid during the reporting period.

When a party is determined “at fault” for facility damage that includes the loss of gas, they are subject to **<u>all</u>** charges required to restore the facility. These charges would include an estimate of gas loss from the incident as it is calculated with an equation that recognizes the pressure of the gas in the damaged pipe and the amount of time estimated that gas was escaping, multiplied by that month’s weighted average commodity cost-of-gas. Additionally, the third party may be subject to all regulatory fines issued by MNOPS depending on the root cause of this damage and their involvement with this root cause.

When payment is received, the portion of the payment related to gas loss is credited to the Company’s current-year over/under gas cost account and passed back to ratepayers in the annual Gas Cost Recovery (GCR), or true-up, factor. By crediting the payments to the current year over/under gas cost account, overall gas costs are reduced for firm customers. As shown in table 7 of the 2017-18 AAA report, $28,853 were credited to firm ratepayers during the 2017-18 gas year

Item 2:
The Department requests that MERC-NNG and CenterPoint provide a discussion in *Reply Comments* regarding this third party, including but not limited to whether this level of strikes is typical and any action the utilities have taken to reduce strikes caused by this party.

CenterPoint Energy wishes to clarify the information provided related to gas losses when there are damages to its distribution system. The report provided lists the party <u>charged</u> for the damage to the system, not necessarily the party that damaged the system. In the case of the party noted, the party is one of three Company contracted line-locators, not the party who ultimately damaged the pipe. The contracted line-locators are assigned work tickets through the Gopher-State one-call system on CenterPoint Energy’s behalf to locate lines when a request is made. If that locate does not meet all requirements, and a damage occurs (i.e. mis locate), the contract locate companies are contractually held liable for the costs of the damages.

CenterPoint Energy meets with all of its line-locating contractors, including the noted contractor weekly throughout the construction season, working to emphasize the importance of their role in providing safe and reliable gas service. In those weekly meetings CNP reviews the root causes of ALL underground damages and determines if any corrective action is needed. Those meetings focus on discussing issues while they are small instead of trying to work through larger issues later. The Company also discusses the results of our recently developed locate auditing program, and partners with line-locators to improve performance.

Overall, the Company experienced slightly more mislocates in 2018 over the three previous years. (See Schedule 8 in CenterPoint Energy’s Service Quality report for 2018 – Docket No. G-008/M-19-304, attached as Exhibit 1). The number of mislocates attributable to this particular contractor is also somewhat higher than average, but in line with the overall trend for 2018. The Company points out that the contractor noted performed over 113,000 locates, heavily in urban areas, in the AAA time period (July 2017-June 2018).

Item 3:

As a reminder to the hedging utilities, in Docket No. G999/AA-17-493 the Commission ordered CenterPoint Energy, MERC, and Xcel Gas to provide, in their reply comments for the 2017 – 2018 reporting year and the five previous reporting years, the following information:

- **The annual cost of each hedging tool used both in real dollars and as a percent of their actual incurred gas costs;**

Annual Cost of Hedging Tool:			
	CNP Hedge Cost	**Total Commodity Cost**	**% of incurred Commodity**
2017-2018	$69,905,835	$488,019,840	14.3%
2016-2017	$93,348,044	$379,245,444	24.6%
2015-2016	$75,489,554	$304,074,770	24.8%
2014-2015	$110,949,638	$514,412,099	21.6%
2013-2014	$77,610,332	$829,315,662	9.4%
2012-2013	$74,700,000	$511,399,920	14.6%

- **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 could be helpful in consultation with the Department;**

Comparison of hedging tool cost if would have used FOM (or any other)				
	If at Market	CNP Hedge Cost	100% Calls	100% Collars
2017-2018	$78,190,030	$69,905,835	$75,162,751	$66,136,533
2016-2017	$86,153,582	$93,348,044	$98,811,033	$89,677,389
2015-2016	$59,893,922	$75,489,554	$70,656,948	$76,948,834
2014-2015	$108,869,719	$110,949,638	$101,097,198	$106,482,828
2013-2014	$97,655,927	$77,610,332	$72,998,580	$70,840,416
2012-2013	$75,100,000	$74,700,000	$75,900,000	$74,900,000
Costs over/(under) market				
2017-2018		($8,284,195)	($3,027,279)	($12,053,497)
2016-2017		$7,194,462	$12,657,451	$3,523,807
2015-2016		$15,595,632	$10,763,026	$17,054,912
2014-2015		$2,079,919	($7,772,521)	($2,386,891)
2013-2014		($20,045,595)	($24,657,347)	($26,815,511)
2012-2013		($400,000)	$800,000	($200,000)
Percent over/(under) market				
2017-2018		-10.6%	-3.9%	-15.4%
2016-2017		8.4%	14.7%	4.1%
2015-2016		26.0%	18.0%	28.5%
2014-2015		1.9%	-7.1%	-2.2%
2013-2014		-20.5%	-25.2%	-27.5%
2012-2013		-0.5%	1.1%	-0.3%

- **A nationally recognized index of gas price volatility for each of the years along with an explanation of the index used; and**

CenterPoint Energy Volatility: NNG Ventura Index v. WACOG					
12 mos Ending	Ventura Index	CPE WACOG	Winter	Ventura Index	CPE WACOG
Mar-18	70%	31%	2017-2018	74%	26%
Mar-17	68%	41%	2016-2017	56%	30%
Mar-16	34%	22%	2015-2016	28%	5%
Mar-15	58%	34%	2014-2015	59%	23%
Mar-14	71%	52%	2013-2014	48%	40%
Mar-13	40%	36%	2012-2013	12%	10%

CenterPoint Energy is not aware of any "nationally recognized index of gas price volatility". The measurement that the Company has provided in its AAA report annually, which includes history back to the 2008-2009 Heating Season uses a "nationally recognized index of gas price" in the NYMEX Ventura data to estimate a volatility comparison. CenterPoint Energy is not aware of an outside source available to confirm the Company's estimates.

- **A discussion of the particular company-specific trends in using hedging tools and how that has informed their strategy moving forward.**

In its annual Gas Procurement Plan, the Company reviews all its planning assumptions and updates hedging plans according to its collective experience, analysis of gas futures prices and gas supply portfolio products (including types of hedge products), and advice from partners who provide recommendations in terms of hedge timing decisions and review of competitive bids. The Plan provides a review of prior-year hedging results and insights gained, and extensive detail about strategies employed to manage risk. CenterPoint Energy provides its Gas Procurement Plan in an annual filing in Docket No. G-008/M-15-914 (Hedging Authorization); the most recent filing was submitted on August 3, 2018.

Company implemented the use of SENDOUT® optimization software[1] in 2008 for the purpose of evaluating possible future gas supply prices and determining appropriate gas supply product mix (e.g., volume of index-priced gas, fixed priced gas, and collared or ceiling priced gas). Company uses SENDOUT® optimization software to generate simulated portfolio results under many pricing scenarios to validate the recommended portfolio structure provides reasonable costs and price protection.

In 2012, Company began using Risked Revenue to provide decision making guidance regarding appropriate timing of entering into the gas price hedge products established in its Plan. Risked Revenue helps Company manage each step of the hedging process with a focus on improving cost performance by use of their proprietary model. When Risked Revenue informs Company

1 Monte Carlo simulation modeling software recommended by the Department of Commerce

of the appropriate time to hedge, Company solicits competitive bids for the hedge products then Risked Revenue reviews the bids and recommends the best cost bid.

Company believes the use of the portfolio optimization software and third-party expert for hedge timing decision making is a best practice that has improved the effectiveness of its gas price hedging process and provides the best cost gas supply portfolio with price protection against severe gas cost fly-ups that would adversely affect its customers' bills.

Item 3:
CenterPoint Energy filed a letter on April 24, 2019 which described a recently identified demand cost issue.

In that letter, the Company explained that the Demand Cost estimate included 20,000 units on the Viking Pipeline as a five-month winter service, but the contract is actually a twelve-month service. CenterPoint Energy's Demand Entitlement filing for the 2017-2018 Heating Season (Docket No. G-008/M-17-533), made on November 1, 2017, included 20,000 units of Viking capacity, an increase from the prior period of 10,000 units.[2] The Company included the units in its cost estimate (Exhibit A, Page 1) as winter only capacity, but the contract is a twelve-month service. In the *Order* dated March 21, 2018, the Minnesota Public Utilities Commission approved the proposed level of demand entitlement and proposed recovery of associated demand costs effective November 1, 2017.

This oversight impacted the Company's Annual Automatic Adjustment ("AAA") (Docket No. G-999/AA-18-374 and G-008/AA-18-573) reports filed September 4, 2018. The *actual cost* of the Viking Entitlement for the AAA period reflected in this docket (was $699,296 (20,000 units x $4.3706/unit = $87,412 per month for eight months); this amount was included in the incurred costs shown on line 2 on Exhibit 2-A during the November 2017 – June 2018 time period. The demand rates used in billing customers accounted for $ 475,070 (20,000 units x $4.7507[3]/unit x 5 months). The net difference of $224,226 unrecovered demand costs ($699,296 minus $475,070) was included in the year-end under collection of demand reported of $2,288,575. As a result, the difference was included in the firm true-up factor implemented in September 2018. While it is difficult to exactly estimate the customer bill impact, CenterPoint Energy estimates the annual impact on an average customer bill to be $0.19 had the recovery rate reflected the full Viking Contract cost. (See Exhibit 2)

The Demand Entitlement filing for the 2018-2019 Heating Season (G-008/M-18-462) that was filed on July 2, 2018, and supplemented on November 1, 2018, included the same incorrect estimate of Viking Entitlement cost (20,000 units for five months instead of twelve.) The 2018-2019 Demand Entitlement remains under review with the Department of Commerce, Division of Energy Resources at this time, and the Company will file a correction in that docket to complete that record.

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[2] The initial request in July 2017 explained that CNP did not expect to be able to recontract for the 10,000 units of Viking entitlement it held, but in the subsequent supplemental filing in November noted it had won a bid for 20,000 units.

[3] The rate was not updated when the contract was signed in 2017; instead the rate used in Exhibit A reflected the Viking tariffed rate for contract terms of 3 years or less, as was the case with the prior period Viking contract.

Similarly, for the as-yet-open AAA period for July 2018-June 2019, CNP has reflected in actual incurred Demand costs $874,120 (20,000 units x $4.3706/unit x 10 months) from July 2018 – April 2019. For the ten months July 2018-April 2019, billed Demand Rates only reflected $437,060 in the annual cost estimate (20,000 units x $4.3706/unit x 5 months). The net difference of $437,060 unrecovered demand costs ($874,120 minus $437,060) will be included in the year-end under collection of demand. The Company estimates the customer bill impact, on an average customer bill to be $0.35 had the recovery rate reflected the full Viking Contract cost (See Exhibit 3). The Company filed a new demand entitlement effective May 1, 2019 that included a correction for the Viking contract in an updated estimated annual demand rate going forward. The Company expects to reflect the difference in the firm true-up factor(s) implemented in September 2019.

CenterPoint Energy concludes that no accounting entries need to be made, nor changes to filed schedules beyond the update to Exhibit A in both noted Demand Entitlement filings. See Minn Rule 7825.2700, subp. 7. The reported Over/Under for Small Firm and Large General Service is correct and includes the amounts discussed, and no prior-period adjustment is required.

Item 4 – **The Department recommends that, going forward, the Commission require all regulated gas utilities to demonstrate whether each, prior-period adjustment made in an Annual True-Up filing is subject to the Billing Error Rule.**

CenterPoint Energy believes that application of billing error rule is case specific, and the Company agrees that it can provide discussion of if billing error rule applies as appropriate/when needed.

CONCLUSION

CenterPoint Energy appreciates the opportunity to clarify the record, and agrees with the Department's recommendation to accept the AAA and True-up filings.

EXHIBIT 1
Docket G999/AA-18-374

CenterPoint Energy
2018 Service Quality Report

Mislocate Rate

	January	February	March	April	May	June	July	August	September	October	November	December	Total
Number of Mislocates													
Mismarked line	5	3	1	6	8	7	11	9	6	13	5	3	77
Failure to mark a line	2	3	3	2	15	10	10	10	10	15	5	5	90
Total	7	6	4	8	23	17	21	19	16	28	10	8	167
Number of Locate Tickets	8,286	7,560	11,056	24,414	56,658	45,756	42,874	46,329	36,159	37,687	18,826	8,936	344,541
Number of Mislocates per 1000 Locate Tickets	0.84	0.79	0.36	0.33	0.41	0.37	0.49	0.41	0.44	0.74	0.53	0.90	0.48

3 Year Average Calculations (2015 - 2017)

# of Mislocates

Year 2015	91
Year 2016	98
Year 2017	127
3 Year Avg	105

# of Locate Tickets

Year 2015	330,306
Year 2016	342,140
Year 2017	349,592
3 Year Avg	340,679

# of Mislocates per 1,000 Tickets

Year 2015	0.28
Year 2016	0.29
Year 2017	0.36
3 Year Avg	0.31

G-999/AA-18-674 amd G-008/AA-18-573 **EXHIBIT 2**

Gas Costs Incurred by Cost Component

Cost Component

Line No.	Jul-17	Aug-17	Sep-17	Oct-17	Nov-17	Dec-17	Jan-18	Feb-18	Mar-18 **	Apr-18	May-18	Jun-18	Total	
System only														
1 Commodity Cost	$8,960,581	$8,653,044	$9,040,983	$22,816,158	$47,841,608	$137,498,400	$83,746,712	$70,022,447	$46,130,013	$34,409,302	$11,080,959	$9,343,738	$489,543,946	
2 Company Use	($3,965)	($4,084)	($4,240)	($33,236)	($58,844)	($37,746)	($29,606)	($31,396)	($17,868)	($11,272)	($14,123)	($67,236)	($313,616)	
3 UG Stor/Wdraw	($644,992)	($702,762)	($697,681)	($653,983)	($43,960)	$892,007	$552,109	$677,564	$403,801	$253,586	($673)	($278,006)	($242,991)	
4 LNG Stor/Wdraw	$47,323	$48,928	$47,915	($258,702)	($507,571)	($110,472)	$29,820	$27,392	$28,059	$32,854	($61,108)	($291,936)	($967,499)	
5 Total Commodity	$8,358,947	$7,995,126	$8,386,977	$21,870,236	$47,231,233	$138,242,189	$84,299,035	$70,696,006	$46,544,005	$34,684,470	$11,005,055	$8,706,560	$488,019,840	
6 Demand Cost	$3,333,779	$3,333,779	$3,329,181	$3,232,778	$12,738,955	$12,467,097	$12,253,311	$12,700,678	$12,674,484	$3,287,872	$2,672,640	$3,418,375	$85,442,929	
7 Propane Cost	$18,798	($12,610)	($1,119)	($41,469)	$54	$20,811	$53,831	$95,173	$9,962	$15,061	$17,313	$15,521	$191,324	
8 Total	$11,711,523	$11,316,295	$11,715,039	$25,061,545	$59,970,242	$150,730,097	$96,606,177	$83,491,857	$59,228,451	$37,987,404	$13,695,008	$12,140,456	$573,654,094	
9	NOTE: Does not include Off System Sales and system damage credits, which are credited directly to the True-Up account													
10 VIKING Difference - included in line 6 above														
11 Original Request			(20,000 x $4.7507 x 5 mos)		$95,014	$95,014	$95,014	$95,014	$95,014				$475,070	(a)
12 Adjusted Request			(20,000 $4.3706 x 12 mos)		$87,412	$87,412	$87,412	$87,412	$87,412	$87,412	$87,412	$87,412	$699,296	(b)
13													$224,226	(b)-(a)
14														
15	(a) - order in Docket G-008/M-17-533 - order dated March 21, 2018												1,082,024,750	(c)
16	(b) - Rolled into True-up G-008/AA-18-573												$0.00021	(d)
17	(c) - Firm Sales Projection in therms in G-008/M-17-533 Nov 2017 (RC 2017 from GR-15-424)													
18	(d) - per therm impact [(a -b) divided by c]												$0.19	(e)
19	(e) - Annual impact at 923 therms ((d) x 923)													

EXHIBIT 3

Gas Costs Incurred by Cost Component

Cost Component

Line No.		Jul-18	Aug-18	Sep-18	Oct-18	Nov-18	Dec-18	Jan-19	Feb-19	Mar-19	Apr-19	May-19	Jun-19	Total	
										**					
	System only														
1	Commodity Cost	$10,621,399	$9,741,359	$11,094,011	$30,805,984	$67,582,850	$81,012,994	$97,439,051	$72,919,053	$65,776,656	$0	$0	$0	$446,993,357	
2	Company Use	($4,237)	($3,402)	($3,179)	($4,785)	($9,258)	($96,623)	($57,217)	($34,481)	($25,872)	$0	$0	$0	($239,054)	
3	UG Stor/Wdraw	($769,573)	($753,195)	($797,150)	($585,648)	$9,789	$399,870	$1,288,478	$621,120	$688,819	$0	$0	$0	$102,511	
4	LNG Stor/Wdraw	$35,053	$36,036	$30,948	$34,058	($251,469)	($283,868)	$414,495	$39,698	$32,210	$0	$0	$0	$87,160	
5	Total Commodity	$9,882,642	$9,020,798	$10,324,630	$30,249,609	$67,331,912	$81,032,374	$99,084,808	$73,545,389	$66,471,812	$0	$0	$0	$446,943,973	
6	Demand Cost	$2,221,454	$2,229,438	$2,225,828	$2,117,682	$14,075,835	$16,582,558	$16,723,378	$16,810,158	$14,771,146	$0	$0	$0	$87,757,477	
7	Propane Cost	$8,040	$3,237	($15,403)	($2,382)	$6,605	$25,198	$1,015,536	$44,567	$24,258	$0	$0	$0	$1,109,655	
8	Total	$12,112,136	$11,253,472	$12,535,055	$32,364,910	$81,414,352	$97,640,129	$116,823,721	$90,400,114	$81,267,216	$0	$0	$0	$535,811,106	
9		NOTE: Does not include Off System Sales and system damage credits, which are credited directly to the True-Up account													
10	VIKING Difference - included in line 6 above														
11	Original Request					$87,412	$87,412	$87,412	$87,412	$87,412				$437,060	(a)
12	Adjusted Request	$87,412	$87,412	$87,412	$87,412	$87,412	$87,412	$87,412	$87,412	$87,412	$87,412			$874,120	(b)
13													Difference/unrecovered	$437,060	(b)-(a)
14		(a) - Requested in Docket G-008/M-18-462 - November 1, 2018													
15		(b) - Rolled into True-up - not yet filed												1,109,443,970	(c)
16		(c) - 2017 Rate Case- Settlement Firm Volumes in therms (GR-17-285) 10 yr WN- effective 11-1-2018												$0.00039	(d)
17		(d) - per therm impact [(a -b) divided by c]													
18		(e) - Annual impact at 890 therms ((d) x 890)												$0.35	(e)

AFFIDAVIT OF SERVICE
G999/AA-18-374 and G-008/AA-18-573

STATE OF MINNESOTA)
) ss.
COUNTY OF HENNEPIN)

Marie Doyle, being first duly sworn on oath, deposes and says she served or caused to be served on behalf of CenterPoint Energy:

- its reply comments on the Department's review of the Annual Automatic Adjustment Report on the Minnesota Public Utilities Commission electronically;
- copies on the Department of Commerce Division of Energy Resources and the Office of the Attorney General electronically;
- and on persons on the enclosed service list; electronically if requested or via paper service for those requesting, by delivering by hand at the respective addresses on the list or by placing in the U.S. Mail at the City of Minneapolis.

__/s/____________________________
Marie M. Doyle

Subscribed and sworn to before me
This 10th Day of May, 2019

___/s/ Melodee Carlson-Chang_________
Notary Public
My Commission expires: 01/31/2024

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@CenterPointEnergy.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
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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
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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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
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