



Minnesota Energy Resources Corporation
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July 3, 2019

VIA ELECTRONIC FILING

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

Re: Correction to 2018-2019 Demand Entitlement and Request for Variances to Allow for Correction through the Purchased Gas Adjustment

In the Matter of Minnesota Energy Resources Corporation's Petition for Approval of a Change in Demand Entitlement for its NNG System, Docket No. G011/M-18-526

Dear Mr. Wolf:

On August 1, 2018, Minnesota Energy Resources Corporation ("MERC" or the "Company") filed a Petition with the Minnesota Public Utilities Commission (the "Commission") for Change in Demand Entitlement for the MERC-NNG purchased gas adjustment ("PGA") area effective November 1, 2018. MERC submitted an update to its August 1, 2018 Demand Entitlement filing on November 1, 2018 and implemented the proposed change in rates effective November 1, 2018.

The Department submitted initial comments on MERC's Demand Entitlement Petition on December 31, 2018, recommending that the Minnesota Public Utilities Commission accept MERC's proposed levels of demand entitlement and permit the Company to recover the associated costs through the monthly PGA effective November 1, 2018, and requesting that MERC provide additional information in Reply Comments. MERC submitted Reply Comments providing the additional information as requested by the Department on January 10, 2019. On May 21, 2019, the Department filed Response Comments continuing to recommend that the Commission accept MERC's proposed level of demand entitlement and allow the Company to recover associated costs through the monthly PGA effective November 1, 2018.

Subsequently, Commission staff identified an error in MERC's treatment of Rochester capacity costs as reflected in the 2018-2019 Demand Entitlement schedules and monthly PGA as implemented November 1, 2018. In particular, in its May 5, 2017, Order Approving Rochester Project and Granting Rider Recovery with Conditions in Docket No. G011/M-15-895, the Commission approved recovery of the costs of the Northern Natural Gas ("NNG") interstate pipeline system upgrades from both firm and interruptible sales customers through the commodity portion of the purchased-gas adjustment.¹ However, MERC incorrectly included the additional Rochester capacity costs for recovery through the demand portion of the PGA, consistent with how other capacity costs are recovered. As a result, MERC's November 1, 2018 through June 30, 2019 demand costs were overstated and the corresponding commodity costs were understated.

Attachment A to this filing is a summary of the estimated impact of this PGA error. The total costs related to the Rochester capacity contract that were charged to firm service customers that should have been charged to interruptible and joint customers was approximately \$423,646. While the customer-

¹ *In the Matter of a Petition by Minnesota Energy Resources Corporation for Evaluation and Approval of Rider Recovery for its Rochester Natural Gas Extension Project*, Docket No. G011/M-15-895, Order Approving Rochester Project and Granting Rider Recovery with Conditions at 14-15 (May 5, 2017).

specific impacts vary from general service over-collections to interruptible and joint service under-collections, an average Residential customer during this period was over-charged approximately \$1.53 while an average Small Volume Interruptible customer during this period was under-charged approximately \$815.46.

MERC proposes to correct this error by taking the following actions. First, MERC will move the Rochester capacity costs from demand to commodity effective with the July 1 PGA, consistent with the Commission's Order in Docket No. G011/M-15-895. MERC recalculated the demand and commodity rates in the original Attachment 4 to the NNG Demand Entitlement filing and includes that updated Attachment 4 as Attachment B to this filing. The corrected Attachment 4 shows the calculations as if the Rochester costs were assigned appropriately to commodity, and separately shows the addition of the Rochester costs to commodity consistent with MERC's treatment of storage contracts. These updated rates will be reflected in MERC's July PGA filing.

Second, MERC proposes correcting for the amounts that were billed through demand but should have been billed through commodity in the period November 1, 2018 through June 30, 2019 through the PGA over a six month period following Commission approval. In order to correct for the error in this manner, MERC requests that the Commission grant variances to Minn. R. 7825.2910; Minn. R. 7825.2700, subp. 7²; Minn. R. 7825.2920, subp. 2³; 7820.4000⁴; and any other applicable rule as necessary to allow MERC to correct for the over- and under-charged amounts through the monthly PGA.

Minn. R. 7829.3200 provides that the Commission shall grant a variance to its rules when it determines that the following requirements are met:

- 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.

Each of these requirements is met under the circumstances. First, enforcement of the applicable rules would impose an excessive burden upon MERC because issuing individual bill credits and additional bill

² Minn. R. 7825.2700, subp. 7 provides:

The true-up amount is the difference between the commodity and demand gas revenues by class collected by the utility and the actual commodity-delivered gas cost and demand-delivered gas cost by class incurred by the utility during the year. The true-up adjustment must be computed annually for each class by dividing the true-up amount by the forecasted sales volumes and applied to billings during the next 12-month period beginning on September 1 each year, provided that the adjustment has been filed under part 7825.2910, subpart 3.

³ Minn. R. 7825.2920, subp. 2 provides:

Subp. 2. Errors. Errors made in adjustment must be refunded by check or credits to bills to the consumer in an amount not to exceed the amount of the error plus interest computed at the prime rate upon the order of the commission if (1) the order is served within 90 days after the receipt of the filing defined in part 7825.2900 or 7825.2910 or at the end of the next major rate proceeding, whichever is later, and (2) the amount of the error is greater than five percent of the corrected adjustment charge.

⁴ Minn. R. 7820.4000, the Natural Gas Utility Billing Errors rule, provides:

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, the amount of the overcharge shall be refunded to the customer or the amount of the undercharge may be billed to the customer as detailed in subparts 2 through 4.

Mr. Daniel P. Wolf
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charges in accordance with the Natural Gas Utility Billing Errors Rule to all sales customers would be administratively difficult and would result in insignificant bill impacts in the majority of cases subject to rounding errors. MERC's proposal to correct for the error through the PGA—the same mechanism through which the contract costs were intended to flow in the first instance—would ensure that firm and interruptible sales customers as a class are appropriately charged for the Rochester capacity costs, and would avoid the confusion and potential for errors associated with the calculation and application of credits and charges to individual accounts. Further, authorizing MERC to implement adjustments to account for the correction over six months will ensure that customers are appropriately charged and refunded within a reasonable timeframe.

Second, granting the proposed variance requests would not adversely affect the public interest. The proposed correction will still ensure that all of MERC's sales customers (firm and interruptible) are accurately charged for the Rochester capacity costs in accordance with the Commission's decisions in Docket No. G011/M-15-895. If approved, MERC proposes to correct for the over- and under-collections through the NNG PGA commencing on the month following Commission approval, over a six month period.

Finally, granting the requested variances would not conflict with standards imposed by law. MERC is not aware of any laws that would be violated by the Commission's approval of the requested variances and its proposal to address this error. Further, the Commission has granted variances to the PGA and billing error rules to allow such adjustments in the past.⁵

MERC respectfully requests that the Commission grant its request to vary the requirements of the PGA rules, specifically, Minn. R. 7825.2910, Minn. R. 7825.2700, and Minn. R. 7825.2920; the natural gas billing errors rule, 7820.4000; and any other applicable rule as necessary to allow MERC to correct for the over- and under-charge amounts through monthly PGA over a six month period; so the Company can correct for the error.

Please contact me at (414) 221-2374 if you have any questions regarding the information in this filing. Thank you for your attention to this matter.

Sincerely,



Mary L. Wolter
Director – Gas Regulatory Planning & Policy

Enclosures
cc: Service List

⁵ For example, in Docket Nos. G999/AA-14-580, G011/AA-14-754 and G011/AA-14-755, MERC requested and was granted variances to address two prior-period errors that were identified. *In the Matter of the Review of the 2013-2014 Annual Automatic Adjustment Reports and Annual Purchased Gas Adjustment True-up Filings*, Docket No. G999/AA-14-580, ORDER ACCEPTING GAS UTILITIES' ANNUAL AUTOMATIC ADJUSTMENT REPORTS AND 2013-2014 TRUE-UP PROPOSALS AND SETTING FURTHER REQUIREMENTS at 4-6 (Aug. 24, 2015) (Order also filed in Docket Nos. G011/AA-14-754 and G011/AA-14-755).

Minnesota Energy Resources Corporation

Estimated Impact of Correction to 2018-2018 Demand Entitlement

November 2018 - June 2019

Sales Forecast (approved in MR-17-564)	GS	Interruptible	Joint	
Nov-18	26,544,383	2,825,852	10,299	
Dec-18	39,264,932	3,849,490	15,294	
Jan-19	43,832,363	4,263,289	23,595	
Feb-19	36,889,104	3,656,498	23,290	
Mar-19	29,939,909	3,102,595	20,096	
Apr-19	17,711,448	2,112,213	14,935	
May-19	9,533,490	1,445,076	11,710	
Jun-19	4,034,903	996,131	7,407	
Jul-19	2,879,194	901,486	4,214	
Aug-19	3,150,182	923,309	4,320	
Sep-19	6,721,234	1,213,848	5,738	
Oct-19	16,394,364	2,002,085	9,585	
Totals	236,895,506	27,291,872	150,483	264,337,861
Average Customer Count	198,574	376	6	
<i>Residential</i>	182,814			
<i>Small Volume Interruptible</i>		327		
Therms - Nov-Jun only	207,750,532	22,251,144	126,626	230,128,302
<i>Residential</i>	137,044,817			
<i>Small Volume Interruptible</i>		15,065,284		
Original Rate / therm	\$ 0.48838	\$ 0.37371		
Revised Rate / therm	\$ 0.48634	\$ 0.39141		
Total Overcollection from GS-1	\$ 423,646			

\$ / Residential Customer	\$ 1.53 Overcharged
\$ / Small Volume Interruptible	\$ (815.46) Undercharged

MINNESOTA ENERGY RESOURCES - NNG**RATE IMPACT OF THE PROPOSED DEMAND CHANGE**

NOVEMBER 1, 2018

All costs in \$/Dth	Base Cost of Gas G011/MR-17-564 Jan 1, 2018	Demand Charge Oct 1, 2017	Demand Charge Demand Filing Nov 1, 2017	Most Recent PGA Oct 1, 2018	Proposed Effective Nov 1, 2018	Result of Proposed Change			
						Change from Last Rate Case	Change from Nov 1, 2017 Demand Filing	Change from Last PGA %	Change from Last PGA \$

1) General Service Residential: Avg. Annual Use:		88		Dth					
Commodity Cost	\$3.7406	\$3.2257	\$3.0201	\$3.4787	\$3.9141	\$0.1735	\$0.8940	12.52%	\$0.4354
Demand Cost	\$0.9361	\$0.9288	\$0.9328	\$0.9367	\$0.9493	\$0.0132	\$0.0165	1.35%	\$0.0126
Commodity Margin	\$2.6284	\$2.4116	\$2.4116	\$2.5727	\$2.5727	(\$0.0557)	\$0.1611	0.00%	\$0.0000
Total Cost of Gas	\$7.3051	\$6.5661	\$6.3645	\$6.9881	\$7.4361	\$0.1310	\$1.0716	6.41%	\$0.4480
Avg Annual Cost	\$642.85	\$577.82	\$560.08	\$614.95	\$654.38	\$11.53	\$94.30	6.41%	\$39.42
Effect of proposed commodity change on average annual bills:									\$38.32
Effect of proposed demand change on average annual bills:									\$1.11

2) Small Vol. Interruptible: Avg. Annual Use:		5,110		Dth					
Commodity Cost	\$3.7406	\$3.2257	\$3.0201	\$3.4787	\$3.9141	\$0.1735	\$0.8940	12.52%	\$0.4354
Demand Cost									
Commodity Margin	\$1.0616	\$0.9740	\$0.9740	\$1.0391	\$1.0391	(\$0.0225)	\$0.0651	0.00%	\$0.0000
Total Cost of Gas	\$4.8022	\$4.1997	\$3.9941	\$4.5178	\$4.9532	\$0.1510	\$0.9591	9.64%	\$0.4354
Avg Annual Cost	\$24,539.24	\$21,460.47	\$20,409.85	\$23,085.96	\$25,310.85	\$771.61	\$4,901.00	9.64%	\$2,224.89
Effect of proposed commodity change on average annual bills:									\$2,224.89
Effect of proposed demand change on average annual bills:									\$0.00

3) Large Vol. Interruptible: Avg. Annual Use:		16,150		Dth					
Commodity Cost	\$3.7406	\$3.2257	\$3.0201	\$3.4787	\$3.9141	\$0.1735	\$0.8940	12.52%	\$0.4354
Demand Cost									
Commodity Margin	\$0.5808	\$0.5329	\$0.5329	\$0.5685	\$0.5685	(\$0.0123)	\$0.0356	0.00%	\$0.0000
Total Cost of Gas	\$4.3214	\$3.7586	\$3.5530	\$4.0472	\$4.4826	\$0.1612	\$0.9296	10.76%	\$0.4354
Avg Annual Cost	\$69,790.61	\$60,701.39	\$57,380.95	\$65,362.28	\$72,393.99	\$2,603.38	\$15,013.04	10.76%	\$7,031.71
Effect of proposed commodity change on average annual bills:									\$7,031.71
Effect of proposed demand change on average annual bills:									\$0.00

4) Small Vol. Firm: Avg. Annual Use:		5,110		Dth					
		25		DTh					
Commodity Cost	\$3.7406	\$3.2257	\$3.0201	\$3.4787	\$3.9141	\$0.1735	\$0.8940	12.52%	\$0.4354
Demand Cost	\$28.0830	\$27.8640	\$27.9840	\$2.8101	\$28.4792	\$0.0000	\$0.4952	913.46%	\$25.6691
Commodity Margin	\$1.0616	\$0.9740	\$0.9740	\$1.0391	\$1.0391	(\$0.0225)	\$0.0651	0.00%	\$0.0000
Demand Margin	\$3.2697	\$3.0000	\$3.0000	\$3.1449	\$3.1449	\$3.1449	\$0.1449	0.00%	\$0.0000
Total Cost of Gas	\$4.8022	\$4.1997	\$3.9941	\$4.5178	\$4.9532	\$0.1510	\$0.9591	9.64%	\$0.4354
Total Demand Cost	\$31.3527	\$30.8640	\$30.9840	\$5.9550	\$31.6241	\$0.2714	\$0.6401	431.05%	\$25.6691
Avg Annual Cost	\$25,323.06	\$22,232.07	\$21,184.45	\$23,234.83	\$26,101.46	\$778.40	\$4,917.00	12.34%	\$2,866.62
Effect of proposed commodity change on average annual bills:									\$2,224.89
Effect of proposed demand change on average annual bills:									\$641.73

5) Large Vol. Firm: Avg. Annual Use:		16,150		Dth					
		75		DTh					
Commodity Cost	\$3.7406	\$3.2257	\$3.0201	\$3.4787	\$3.9141	\$0.1735	\$0.8940	12.52%	\$0.4354
Demand Cost	\$28.0830	\$27.8640	\$27.9840	\$2.8101	\$28.4792	\$0.3962	\$0.4952	913.46%	\$25.6691
Commodity Margin	\$0.5808	\$0.5329	\$0.5329	\$0.5685	\$0.5685	(\$0.0123)	\$0.0356	0.00%	\$0.0000
Demand Margin	\$3.2697	\$3.0000	\$3.0000	\$3.1449	\$3.1449	\$0.0000	\$0.1449	0.00%	\$0.0000
Total Cost of Gas	\$4.3214	\$3.7586	\$3.5530	\$4.0472	\$4.4826	\$0.1612	\$0.9296	10.76%	\$0.4354
Total Demand Cost	\$31.3527	\$30.8640	\$30.9840	\$5.9550	\$31.6241	\$31.6241	\$0.6401	431.05%	\$25.6691
Avg Annual Cost	\$72,142.06	\$63,016.19	\$59,704.75	\$65,808.91	\$74,765.80	\$4,975.19	\$15,061.05	13.61%	\$8,956.90
Effect of proposed commodity change on average annual bills:									\$7,031.71
Effect of proposed demand change on average annual bills:									\$1,925.19

Note: Average Annual Average based on NNG Annual Automatic Adjustment Report in Docket No. E,G999/AA-17-493

Note: Rates do not include the ACA adjustment.

MINNESOTA ENERGY RESOURCES - NNG

RATE IMPACT OF THE PROPOSED DEMAND CHANGE

NOVEMBER 1, 2018

NNG							01-Nov-18	
IV. NORTHERN NATURAL GAS COMPANY'S RATES -- CURRENT COST OF GAS EFFECTIVE								
	Tariff-Summer(7 mths)	Tariff-Winter(5 mths)	Wt. Annual	GRI	Total			
TF-12B	112495 \$	5.6830 \$	10.2300	\$7.5776	\$0.0000	\$7.5776		
TF-12B Discount	112495 \$	5.6830 \$	10.0320	\$7.4951	\$0.0000	\$7.4951		
TF-12V	112495 \$	5.6830 \$	13.8660	\$9.0926	\$0.0000	\$9.0926		
TF-5	112495 \$	- \$	15.1530	\$15.1530	\$0.0000	\$15.1530		
TFX	112486 \$	5.6830 \$	15.1530	\$9.6288	\$0.0000	\$9.6288		
TFX-5	112486 \$	- \$	15.1530	\$15.1530	\$0.0000	\$15.1530		
TFX-5 Discount	112486 \$	- \$	10.0320	\$10.0320	\$0.0000	\$10.0320		
TFX Rochester	112486 \$	37.1175 \$	37.1175	\$37.1175	\$0.0000	\$37.1175		
TFX - Discount	111866 \$	2.2192 \$	15.1392	\$7.6025	\$0.0000	\$7.6025		
TFX - Discount	111866 \$	4.8640 \$	4.8640	\$4.8640	\$0.0000	\$4.8640		
TFX - Discount	111866 \$	5.4720 \$	5.4720	\$5.4720	\$0.0000	\$5.4720		
TFX-5	127852 \$	- \$	15.1530	\$15.1530	\$0.0000	\$15.1530		
Gas Cost						\$2.9695	/Dth	
V. ANNUAL SALES -- As approved in Docket No. G011/MR-17-564						264,337,861		
VI. MERC-NNG'S CURRENT COST OF GAS EFFECTIVE:							01-Nov-18	
		Contract #s(s)	Monthly Entitlements (Dth)	Months	Rate (\$/Dth)	Contract Costs	Rate/Therm	
A. GS-NNG	TF12B (Max Rate) Winter	112495	46,506	5	\$ 10.2300	=	\$2,378,782 \$ 0.01004	
	TF12B (Max Rate) Summer	112495	46,506	7	\$ 5.6830	=	\$1,850,055 \$ 0.00781	
	TF12V (Max Rate)	112495	33,003	12	\$ 9.0926	=	\$3,600,997 \$ 0.01520	
	TF5 (Max Rate)	112495	36,275	5	\$ 15.1530	=	\$2,748,375 \$ 0.01160	
	TF12B (Discount-Winter)	112495	5,200	12	\$ 7.4951	=	\$467,694 \$ 0.00197	
	TFX12 (Max Rate)	112486	16,261	12	\$ 9.6288	=	\$1,878,887 \$ 0.00793	
	TFX Apr (Max Rate)	112486	2,000	1	\$ 5.6830	=	\$11,366 \$ 0.00005	
	TFX Oct (Max Rate)	112486	2,000	1	\$ 5.6830	=	\$11,366 \$ 0.00005	
	TFX5 (Max Rate)	112486	77,688	5	\$ 15.1530	=	\$5,886,031 \$ 0.02485	
	TFX5 (Discount)	112486	1,800	5	\$ 10.0320	=	\$90,288 \$ 0.00038	
	TFX12 (Discount)	111866	1,283	12	\$ 4.8640	=	\$74,886 \$ 0.00032	
	TFX12 (Discount)	111866	8,271	12	\$ 5.4720	=	\$543,107 \$ 0.00229	
	TFX12 (Discount)	111866	11,921	12	\$ 7.6025	=	\$1,087,553 \$ 0.00459	
	TFX5 (Discount)	111866	379	5	\$ 4.8640	=	\$9,217 \$ 0.00004	
	TFX5 (Discount)	111866	2,445	5	\$ 5.4720	=	\$66,895 \$ 0.00028	
	TFX5 (Discount)	111866	22,189	5	\$ 15.1392	=	\$1,679,619 \$ 0.00709	
	Windom		2,500	12	\$ -	=	\$0 \$ -	
	Northwestern Energy		1,035	12	\$ 8.3382	=	\$103,560 \$ 0.00044	
	Total Demand Cost						\$22,488,679	\$ 0.09493
As proposed in Docket No. G011/MR-17-564						236,895,506		
GS-1 Demand Current Cost of Gas/therm							\$ 0.09493	
GS-1 Commodity Current Cost of Gas/therm							\$ 0.39141	
Total GS-1 Current Cost of Gas/therm							\$ 0.48634	
B. GS-NNG, SVI-NNG, LVI-NNG, SJ-NNG, LJ-NNG, SLV-Commodity								
		Monthly Entitlement (Dth)	Months	Rate (\$/Dth)	Contract Costs	Contract Costs	Rate (\$/therm)	
FDD - Reservation	118657	81,508	12	\$ 1.7140	=	\$1,676,457	\$ 0.00634	
FDD - Storage Cycle	118657	939,864	5	\$ 0.3567	=	\$1,676,248	\$ 0.00634	
FDD - Reservation	118657	5,550	12	\$ 3.3157	=	\$220,826	\$ 0.00084	
FDD - Storage Cycle	118657	64,000	5	\$ 0.6901	=	\$220,832	\$ 0.00084	
FDD - Reservation	133736	17,345	12	\$ 1.7140	=	\$356,752	\$ 0.00135	
FDD - Storage Cycle	133736	200,000	5	\$ 0.3567	=	\$356,700	\$ 0.00135	
FDD - Reservation	132024*	8,672	12	\$ 1.7140	=	\$178,366	\$ 0.00067	
FDD - Storage Cycle	132024*	100,000	5	\$ 0.3567	=	\$178,350	\$ 0.00067	
Firm Deferred Delivery Storage Contracts						\$4,864,530	\$ 0.01840	
Per Docket No. G-007/M-07-1402-05 dated August 6, 2014, storage demand charges will be allocated through the commodity charge effective 11/1/2014.								
		Monthly Entitlement (Dth)	Months	Rate (\$/Dth)	Contract Costs	Contract Costs	Rate (\$/therm)	
Bison	FT0003	50,000	12	\$ 17.4896	=	\$10,493,750	\$ 0.03970	
NBPL	T8673F	50,000	12	\$ 6.3905	=	\$3,834,300	\$ 0.01451	
TFX12 (Rochester)	112486	10,500	12	\$ 37.1175	=	\$4,676,805	\$ 0.01769	
						\$19,004,855	\$ 0.07190	
Per Doct No. G-007/M-10-1166 and G-011/M-10-1168 dated January 26, 2015, recover the costs associated with Bison contract through commodity effective								
		Annual Sales (Dth)		Rate (\$/Dth)	Commodity Cost	Rate Case Sales (therm)	Rate (\$/therm)	
CD-1 Commodity		26,433,786	x	\$2.9695	\$78,495,128	264,337,861	\$ 0.29695	
SMS-Bal Service		272,160	x	\$2.1800	\$593,309	264,337,861	\$ 0.00224	
Physical Forward Start Premium					\$128,700	264,337,861	\$ 0.00049	
Call Option Premium					\$378,446	264,337,861	\$ 0.00143	
GS-NNG, SVI-NNG, LVI-NNG, SJ-NNG, LJ-NNG, SLV Commodity Current Cost of Gas/therm						\$84,460,112	264,337,861 \$ 0.39141	
*Contract 132024 was transposed with contract 132112 in the 2017-2018 Demand Entitlement Filing (no impact to volumes or dollars in total)								

In the Matter Minnesota Energy
Resources Corporation's Petition for
Approval of a Change in Demand
Entitlement for its NNG System

Docket No. G011/M-18-526

CERTIFICATE OF SERVICE

I, Kristin M. Stastny, hereby certify that on the 3rd day of July, 2019, on behalf of Minnesota Energy Resources Corporation (MERC) I electronically filed a true and correct copy of the enclosed Letter on www.edockets.state.mn.us. Said documents were also served via U.S. mail and electronic service as designated on the attached service list.

Dated this 3rd day of July, 2019.

/s/ Kristin M. Stastny
Kristin M. Stastny

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Michael	Ahern	ahern.michael@dorsey.com	Dorsey & Whitney, LLP	50 S 6th St Ste 1500 Minneapolis, MN 554021498	Electronic Service	No	OFF_SL_18-526_M-18-526
Elizabeth	Brama	ebrama@briggs.com	Briggs and Morgan	2200 IDS Center 80 South 8th Street Minneapolis, MN 55402	Electronic Service	No	OFF_SL_18-526_M-18-526
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_18-526_M-18-526
Riley	Conlin	riley.conlin@stoel.com	Stoel Rives LLP	33 S. 6th Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_18-526_M-18-526
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_18-526_M-18-526
Darcy	Fabrizius	Darcy.fabrizius@constellation.com	Constellation Energy	N21 W23340 Ridgeview Pkwy Waukesha, WI 53188	Electronic Service	No	OFF_SL_18-526_M-18-526
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_18-526_M-18-526
Daryll	Fuentes	dfuentes@usg.com	USG Corporation	550 W Adams St Chicago, IL 60661	Electronic Service	No	OFF_SL_18-526_M-18-526
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