

October 1, 2019

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

RE: Additional Comments of the Minnesota Department of Commerce, Division of Energy Resources

Docket Nos. G008/M-17-533, G008/M-18-462, G999/AA-18-374, and G008/AA-18-573

Dear Mr. Wolf:

Attached are the additional comments of the Minnesota Department of Commerce, Division of Energy Resources (Department) in the following matters:

CenterPoint Energy Resources Corp. d/b/a CenterPoint Energy Minnesota Gas' (CenterPoint or the Company) Request for Change in Demand Units for the 2017-2018 Heating Season (Demand Petition).

CenterPoint Energy Resources Corp. d/b/a CenterPoint Energy Minnesota Gas' Request for Change in Demand Units for the 2018-2019 Heating Season (2018-2019 Demand Petition).

In the Matter of the 2017-2018 (FYE18) Annual Automatic Adjustment (AAA) Reports (AAA Report).

CenterPoint Energy Resources Corp., d/b/a CenterPoint Energy Minnesota Gas' 2017-2018 Annual Purchased Gas Adjustment (PGA) True-up Filing.

The Demand Petition was filed on July 3, 2017, supplemented on November 1, 2017, and approved by the Minnesota Public Utilities Commission (Commission) on March 21, 2018. CenterPoint filed a letter on April 24, 2019 informing the Commission and stakeholders that there was an error in the Company's demand cost calculation, affecting multiple dockets, and that it intended to file corrections in the relevant dockets in the near future.

The 2018-2019 Demand Petition was filed on July 2, 2018 and supplemented on November 1, 2018. CenterPoint filed the same letter on April 24, 2019 as was filed in the 2017-2018 Demand Petition docket, and also filed Reply Comments on July 1, 2019.

Daniel P. Wolf October 1, 2019 Page 2

The AAA Report and annual true-up were filed on September 4, 2018. CenterPoint also filed the same April 24, 2019 letter in the AAA Report docket, as well as Reply Comments on May 10, 2019, and Reply to the Department's Response Comments on July 15, 2019.

Based on its review, the Department recommends that the Commission:

- Require CenterPoint to remove approximately \$224,226 of costs from its true-up calculation for the 2017-2018 AAA period;
- Refund to ratepayers, through a credit to the first monthly PGA after the issuance of an Order regarding this matter, \$224,226 in inappropriate demand cost recovery plus interest calculated at the Prime Rate;
- Prohibit CenterPoint from including, in future true-up adjustments, the costs associated with the Viking error that were under-recovered over the period from July 2018 to June 2019.
- Accept CenterPoint's FYE18 true up, as modified in these comments, in Docket No. G008/AA-18-573; and
- Allow CenterPoint to implement its true up, as modified in these comments.

The Department also maintains its recommendations on CenterPoint's 2018-2019 Demand Petition (Docket No. G008/M-18-462) as presented in the Department's Response to Reply Comments filed on June 19, 2019.

The Department is available to respond to any questions that the Commission may have on this matter.

Sincerely,

/s/ ADAM J. HEINEN
Public Utilities Rates Analyst

AJH/ar Attachment



Before the Minnesota Public Utilities Commission

Additional Comments of the Minnesota Department of Commerce Division of Energy Resources

Docket Nos. G008/M-17-533, G008/M-18-462, G999/AA-18-374, and G008/AA-18-573

I. BACKGROUND AND INTRODUCTION

On July 1, 2017, CenterPoint Energy Resources Corp. d/b/a CenterPoint Energy Minnesota Gas (CenterPoint or the Company) filed its demand entitlement for the 2017-2018 heating season and later supplemented it (Supplemental Filing) on November 1, 2017. In its Supplemental Filing, CenterPoint included, among other capacity changes, a 20,000 Dekatherm (Dkt)/day capacity contract on the Viking Gas Pipeline (Viking). The Minnesota Department of Commerce, Division of Energy Resources (Department) filed Comments on January 2, 2018 recommending that the Minnesota Public Utilities Commission (Commission) accept the Company's proposed level of demand entitlement, including the 20,000 Dkt/day of Viking capacity, and allow CenterPoint to recover associated demand costs through the monthly Purchased Gas Adjustment (PGA). On March 21, 2018, the Commission issued an Order approving CenterPoint's proposed level of demand entitlement and proposed recovery of associated demand costs effective November 1, 2017.

On September 4, 2018, CenterPoint filed its Annual Automatic Adjustment Report (AAA Report) and Annual PGA True-Up Report (True-up Filing) in Docket Nos. G999/AA-18-374 and G008/AA-18-573. As part of these filings, CenterPoint proposed a true-up factor, inclusive of under-recovered demand costs of \$2,288,575, which would be assessed to ratepayers over the period from September 1, 2018 to August 31, 2019. The Department filed its AAA Report on April 25, 2019 recommending that the Commission accept CenterPoint's true-up and allow the Company to implement its true up. The Department also requested that CenterPoint provide additional discussion and information in Reply Comments.

On April 24, 2019, CenterPoint filed a Letter in the above-referenced dockets, as well as its 2018-2019 and 2019-2020 heating season demand entitlement filings, notifying the Commission that the Company identified an error in its demand costs. CenterPoint stated that it had indicated in its 2017 demand entitlement filing that the Company added 20,000 Dkt/day of capacity on the Viking Pipeline beginning November 1, 2017. This contract is for 12-month service; however, CenterPoint labeled it as a 5-month winter service in the demand entitlement filing and the subsequent monthly PGAs between November 2017 and April 2019. CenterPoint explained, in addition to being included in the 2017-2018 demand entitlement docket (Order issued March 21, 2018), this error was also reflected in the 2018-

¹ Docket No. G008/M-17-533.

² Docket No. G008/M-18-462 and Docket No. G008/M-19-278.

Analyst assigned: Adam J. Heinen

Page 2

2019 demand entitlement docket and the 2018 AAA proceeding, both of which remain under review by the Department and the Commission.³ As a solution, CenterPoint indicated the following:

CenterPoint Energy intends to produce a complete set of documentation and file corrections to the relevant dockets to reconcile this issue. The costs of the Viking contract were paid, beginning November 1, 2017, but those costs were only partially recovered (five months versus twelve months) in the corresponding Purchase Gas Adjustments. As a result, the difference has been rolled in to the AAA/true-up under-recovery that was implemented on September 1, 2018, and the Company will include this issue in comments to be filed in that AAA docket. In addition, the Company will incorporate the change into its upcoming Request for Change in Demand Units filing (assigned Docket No. G-008/M-19-278) and its May 2019 PGA (Docket G-008/AA-19-279) to be filed on May 1, 2019.

On May 10, 2019, CenterPoint filed Reply Comments providing additional discussion and information regarding its Viking error. The Company explained that because of the error there was a net difference of \$224,226 in unrecovered demand costs during the true up period (July 2017 to June 2018) and that this unrecovered balance was included in the year-end under-collection of demand costs as part of the firm true-up factor implemented in September 2018. CenterPoint also stated that the under-recovery that has occurred during the July 2018 to June 2019 true-up period will be included in the year-end under-collection of demand costs in a future true-up filing. The Company also concluded that no accounting entries needed to be made, nor changes to filed schedules in the true-up and AAA dockets, since the reported recovery figures are correct and do not include a prior period adjustment.

In Docket Nos. G999/AA-18-374 and G008/AA-18-573, the Department filed Response Comments on June 14, 2019, which included updated recommendations from the Department's AAA Report submitted on April 25, 2019. Based on the information in CenterPoint's May 10, 2019 Reply Comments, the Department recommended that the Commission withhold its decision on CenterPoint's true-up, pending resolution of the Viking demand contract issue in the Company's 2017 and 2018 Demand Entitlement proceedings.⁶

On July 1, 2019, CenterPoint filed Reply Comments in Docket No. G008/M-18-462 opposing the Department's recommendations regarding the Viking demand error and stating that it would provide additional analysis on July 15, 2019 in Docket No. G008/AA-18-573.⁷

³ CenterPoint Letter, Pages 1-2.

⁴ The Department provided analysis and recommendations regarding treatment of these demand costs in future true-up periods in its June 19, 2019 Response Comments in Docket No. G008/M-18-462.

⁵ May 10, 2019 Reply Comments, Pages 5-6, Docket Nos. G999/AA-18-374 and G008/AA-18-573.

⁶ Department Response Comments, Page 6, Docket Nos. G999/AA-18-374 and G008/AA-18-573.

⁷ The Department notes that the majority of the discussion in these comments relates to the 2018 AAA and True Up filings. However, these arguments and analysis are relevant to both demand entitlement filings.

Analyst assigned: Adam J. Heinen

Page 3

On July 15, 2019, CenterPoint filed its Reply to Response Comments responding to the Department's June 14, 2019 Response to Reply Comments in Docket No. G008/AA-18-573 and providing additional discussion of its Viking demand error in response to the Department's Comments in Docket G008/M-18-462.

The Department provides additional analysis and discussion of the Viking demand contract issue and its relation to CenterPoint's true-up factor below.

II. SUMMARY OF CENTERPOINT'S POSITION

On July 1, 2019, CenterPoint responded to the Department's June 19, 2019 Response Comments in Docket No. G008/M-18-462. Specific to the Viking contract issue, the Company stressed that Minnesota Rule 7825.2700, subp. 7 allows CenterPoint to recover "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" regardless of whether an error has occurred, since the costs were prudently incurred.

On July 15, 2019, CenterPoint responded to the Department's June 14, 2019 Response Comments in Docket Nos. G999/AA-18-374 and G008/AA-18-573. Specific to the Viking contract issue, the Company:

- Disagreed with the Department's recommendation that the Commission withhold its decision on CenterPoint's true-up, pending resolution of the demand cost issue in Docket Nos. G008/M-17-533 and G008/M-17-462;
- Concluded that the plain language of Minnesota Rule 7825.2700, subp. 7 allows the Company to include the \$224,225 unrecovered demand costs incurred in the 2017-2018 gas year in the 2017-2018 true-up, and the \$437,060 incurred in the 2018-2019 gas year in the yet-to-be-filed 2018-2019 true-up, since there is no dispute that those costs were prudently incurred;
- Asserted that Minnesota Rule 7825.2920, subp. 2 does not apply to this situation because application of this rule would "prevent a utility from returning any funds over-collected if the over-collection amounted to less than five percent" and because the rule applies only when "a utility has over-collected substantially such that return of funds through the PGA mechanism would be inappropriate. Further, application of the rule would appear to "allow an automatic adjustment filing to be 'corrected' many years after filing;" and
- Noted that Minnesota Rule 7825.2920, subp. 2 does not indicate what types of errors
 it covers, and that the Company was not aware of an instance in which application of
 the rule resulted in a denial of prudently incurred costs.

Finally, CenterPoint indicated that if the Commission concludes that Minnesota Rule 7825.2920, subp. 2 applies to the error regarding the Viking contract, the Commission should grant the Company a variance to allow CenterPoint to include the unrecovered amounts in the PGA true-up.

Analyst assigned: Adam J. Heinen

Page 4

III. DEPARTMENT ANALYSIS

As noted on page 8 of the Department's June 19, 2019 Response Comments in Docket No. G008/M-18-462, there is no dispute that the Viking contract and its associated capacity costs are reasonable; the only area of concern is the appropriate level of cost recovery given CenterPoint's rate calculation error. The Company incorrectly reported costs in two demand entitlement proceedings, and assessed demand costs that did not reflect the full cost of the Viking contract.⁸

Also as noted on page 9 of the Department's Response Comments, given that fuel costs fluctuate, the PGA mechanism was developed and designed to allow utilities to recover prudently incurred fuel costs, and fuel cost fluctuations, that are outside the of the utility's control. As a protection for ratepayers, Minnesota Rule 7825.2920, subp. 2 ensures that when a utility makes an error in the PGA adjustment that is greater than 5 percent of the corrected adjustment charge, refunds with interest are provided by check or bill credits. The rule is silent regarding instances in which the error is less than 5 percent of the correct adjustment charge, or instances in which the error resulted in uncollected amounts. Therefore, the Commission has the authority under Minnesota Statute § 216B.03 to determine a reasonable rate.

As discussed in its June 19, 2019 Response Comments, the Department's extensive research into the development of Minnesota Rule 7825.2920, subp. 2 showed that symmetrical treatment of errors – surcharges and refunds – was not contemplated during the rulemaking proceeding. The Department concluded that this asymmetrical treatment was logical given that the automatic adjustment mechanism is meant to enable a utility to recover fluctuations in fuel costs that are outside of its control; therefore, fluctuations caused by a utility's error should not be included in the adjustment mechanism, unless customers are harmed by the utility's error.

Given this summation of the Department's position, the Department responds to CenterPoint's arguments.

A. Disagreement with the Department's recommendation that the Commission withhold its decision on CenterPoint's true-up, pending resolution of the demand cost issue in Docket Nos. G008/M-17-533 and G008/M-18-462

CenterPoint did not explain why it believes it is not appropriate to resolve the Viking contract issue prior to allowing the Company to implement its 2017-2018 true-up billing factors; therefore, the Department is unable to respond.

B. Conclusion that the plain language of Minnesota Rule 7825.2700, subp. 7 allows the Company to include the \$224,225 unrecovered demand costs incurred in the 2017-

⁸ The correct contract length and associated costs were reflected beginning with CenterPoint's May 2019 PGA filing.

⁹ Minnesota Rules 7820.4000, governing natural gas utility billing errors generally, do reflect an asymmetric treatment of errors by limiting surcharges to one year and refunds to 3 years.

Analyst assigned: Adam J. Heinen

Page 5

2018 gas year in the 2017-2018 true-up, and the \$437,060 incurred in the 2018-2019 gas year in the yet-to-be-filed 2018-2019 true-up, since there is no dispute that those costs were prudently incurred

As noted in previous comments and above, prudency of the costs are not at issue; rather, the Commission has the authority to protect customers from being charged out-of-time costs (in addition to current costs) due to utility error, regardless of whether the underlying costs were prudently incurred.

C. Assertion that Minnesota Rule 7825.2920 does not apply to this situation because application of this rule would "prevent a utility from returning any funds overcollected if the over-collection amounted to less than five percent" and because the rule applies only when "a utility has over-collected substantially such that return of funds through the PGA mechanism would be inappropriate. Further, application of the rule would appear to "allow an automatic adjustment filing to be 'corrected' many years after filing."

Clearly, application of Minnesota Rule 7825.2920 would not prevent a utility from providing refunds due to utility error that are less than 5 percent of the correct charge. The rule states that such refunds *must* be provided through checks or bill credits; however, application of the rule does not prevent the Commission from deciding how refunds of less than 5 percent of the correct charge can be refunded. For example, the Commission could decide that, despite the requirement to provide larger refunds through a check or bill credit, smaller refunds could also be refunded in that manner, or could be included in the true-up. Further, the Commission's *Findings of Fact, Conclusions, and Order Adopting Rule Amendments* (1989 Order) in Docket No. G999/R-85-789 (1985 Rulemaking), which created the true up, states the following:¹⁰

The Commission finds that subpart 2 of this rule [7825.2920] requires utilities to refund the amount of *any* errors in calculating the adjustment plus interest. [Emphasis added.]

Finally, the rule's requirement that the Commission's order is to be filed within "90 days after receipt of the filing... or at the end of the next major rate proceeding, whichever is later" does not mean that a utility could potentially correct an automatic adjustment error years after the error occurred. The Commission's Findings, Conclusions and Order for Automatic Adjustment of Charges for Public Utility Service on June 15, 1977 (1977 Order) clarifies the purpose of the 90-day timing: 11

The Commission agrees with Minnesota Power and Light that any refund to the consumer may be made by either a check to the consumer or a credit on his bill. Any refund shall be included interest computed at the

¹⁰ August 28, 1989 Order, Docket No. G999/R-85-789, Page 10.

¹¹ June 15, 1977 Order, Docket No. A-8117-11, Page 34.

Analyst assigned: Adam J. Heinen

Page 6

prime rate...The Commission recognizes that it is neither feasible nor economical for its staff to conduct a field audit for each automatic adjustment filed with the Commission. The Commission notes that a field audit is generally conducted in conjunction with a general rate increase filing. As part of that field audit, the staff reviews the utility's automatic adjustment clause and the utility's use of that clause. The Commission agrees that the time period for refunding should be extended so that it is possible to conduct a field audit of the utility's books.

The final rule language incorporated these findings without change and stated the following, which is consistent with the current language of Minnesota Rule 7825.2920, subp. 2:12

Errors made in adjustment must be refunded by check or credits to bill 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 provided that:

- (1) Such order is served within 90 days after the receipt of the filing defined in rule PSC 394(b) or at the end of the next major rate proceeding, whichever is later, and
- (2) The amount of the error is greater than 5% of the corrected adjustment charge.

The additional discussion in the 1977 Order shows that the timing provision in Minnesota Rule 7825.2920, subp.2, was meant to deal with regulatory realities in the 1970s. As the PGA and federal regulations evolved over time, it became unnecessary for the Department, or the Commission, to conduct field audits to determine whether changes in fuel costs were reasonable. Furthermore, once the base cost of gas is determined in a general rate case, changes in fuel costs are now reviewed separately from natural gas general rate case proceedings, in the annual automatic adjustment proceedings. It appears that the Commission expected that review of general rates and fuel costs would occur at, or around the same time, and wanted to ensure that there was adequate time to conduct a field audit. This expectation is no longer relevant.

D. Observance that Minnesota Rule 7825.2920 does not indicate what types of errors it covers, and that the Company was not aware of an instance in which application of the rule resulted in a denial of prudently incurred costs.

As previously noted, the Commission's 1977 Order is clear that Minnesota Rule 7825.2920 applies to all error types. The Department is also not aware of an instance in which application of the rule resulted in a denial of prudently incurred costs; however, this issue is currently being addressed in Docket Nos. E999/AA-18-373 (regarding Xcel Energy's proposal to surcharge its electric customers for refunds

_

¹² June 15, 1977 Order, Docket No. A-8117-11, Page 34.

Analyst assigned: Adam J. Heinen

Page 7

proposed to be provided to its gas customers for Xcel Energy's error in allocating gas costs related to the High Bridge generation facilities) and G011/M-18-526 (regarding Minnesota Energy Resources Corporation's error in including Rochester capacity costs in the demand portion of its PGA). The Department concludes that it is important to incent utilities to correctly calculate automatic adjustment charges, and to protect ratepayers from utility errors.

E. Variance Request

CenterPoint indicated that if the Commission finds that Minnesota Rule 7825.2920, subp. 2, applies in this instance, it requests a rule variance to allow the Viking contract costs to be included in the PGA true-up. Minnesota Rule 7829.3200 allows the Commission to grant a variance to its rules when it determines 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.

The Department disagrees with the Company's conclusion that all three requirements for a variance are met in this instance. First, CenterPoint incorrectly argued that enforcement of the rule will impose a burden on the Company since it would be denied recovery of costs acknowledged to be necessary and reasonable. As previously noted, granting this variance would adversely impact the public interest. Allowing the Company to recover these costs in the true-up increases costs to ratepayers and requires them to pay for mistakes within the control of the Company. If CenterPoint is allowed to recover these costs by including them in the true up, it will effectively remove any incentive for a utility to appropriately review, or track, the costs charged in the PGA because under-recoveries due to utility error can be trued up later.

IV. CONCLUSIONS

Based on the discussion above, the Department concludes that CenterPoint's request to include \$224,226 in the Company's true-up to be surcharged to ratepayers is unreasonable. The Department also concludes that CenterPoint's request to include past under-recovered demand costs associated with the Viking error in future true-up adjustments over the period from July 2018 to June 2019 is unreasonable. This disallowance would result in under-recovered demand costs of \$2,064,349 and cumulative under-recovery of \$43,514,348 versus the originally filed \$43,738,574. The disallowance would result in a minor adjustment to the true-up factors originally proposed by the Company.

¹³ Department Report, Page 29.

Analyst assigned: Adam J. Heinen

Page 8

Table G11a – CenterPoint Originally Filed True-Up Factors per Dekatherm (Dth) by Customer Class

(As filed by CenterPoint)¹⁴

Class Factor
Small Volume Firm \$0.3620
Large General Service \$0.2643
Small Volume Dual Fuel \$0.2161
Large Volume Dual Fuel \$0.2376

Revised Table G11a – CenterPoint Modified True-Up Factors per Dekatherm (Dth) by Customer Class

(As filed by CenterPoint)¹⁵

Class Factor

Small Volume Firm \$0.3620

Large General Service \$0.2641

Small Volume Dual Fuel \$0.2161

Large Volume Dual Fuel \$0.2376

As noted above, the true-up factors assessed by CenterPoint since September 1, 2018 include \$224,226 in under-recoveries during the July 2017 – June 2018 true-up period due to CenterPoint's Viking contract error. The Department concludes that because the \$224,226 under-recovery was due to Company error, the relevant rules governing errors in automatic adjustments protect ratepayers for errors made by the utility, and utilities should be incented to minimize errors within their control, it is not reasonable for CenterPoint to have included the under-recovery in its true-up, thus surcharging ratepayers for the error amount.

Similarly, the Department concludes that it would be unreasonable to allow CenterPoint to include under-recovered demand costs during the July 2018 – June 2019 true-up period associated with the Viking contract error in future true-up adjustments.

In order to rectify the inappropriate surcharge in place since September 1, 2018, the Department recommends that the Commission require CenterPoint to apply a credit to the first monthly PGA after the issuance of an Order in this matter to return the \$224,226, plus interest at the Prime Rate.

V. DEPARTMENT RECOMMENDATIONS

Based on its review, the Department recommends that the Commission:

¹⁴ Department Report, Page 29.

¹⁵ Department Report, Page 29.

Analyst assigned: Adam J. Heinen

Page 9

- Require CenterPoint to remove approximately \$224,226 of costs from its true up calculation for the 2017-2018 AAA period;
- Refund to ratepayers, through a credit to the first monthly PGA after the issuance of an Order regarding this matter, \$224,226 in inappropriate demand cost recovery plus interest calculated at the Prime Rate;
- determine that inclusion of under-recovered demand costs over the period from July 2018 to June 2019 associated with the Viking error in future true-up adjustments is unreasonable.
- Accept CenterPoint's FYE18 true up, as modified in these comments, Docket No. G008/AA-18-573; and
- Allow CenterPoint to implement its true up, as modified in these comments.

The Department also maintains its recommendations in Docket No. G008/M-18-462 as presented in its Response to Reply Comments filed on June 19, 2019.

/ar

CERTIFICATE OF SERVICE

I, Sharon Ferguson, hereby certify that I have this day, served copies of the following document on the attached list of persons by electronic filing, certified mail, e-mail, or by depositing a true and correct copy thereof properly enveloped with postage paid in the United States Mail at St. Paul, Minnesota.

Minnesota Department of Commerce Additional Comments

Docket No. G008/M-17-533, G008/M-18-462, G999/AA-18-374, and G008/AA-18-573

Dated this 1st day of October 2019

/s/Sharon Ferguson

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
David	Aafedt	daafedt@winthrop.com	Winthrop & Weinstine, P.A.	Suite 3500, 225 South Sixth Street	Electronic Service	Yes	OFF_SL_17-533_M-17-533
				Minneapolis, MN 554024629			
Tamie A.	Aberle	tamie.aberle@mdu.com	Great Plains Natural Gas Co.	400 North Fourth Street Bismarck,	Electronic Service	No	OFF_SL_17-533_M-17-533
				ND 585014092			
Kenneth	Baker	Ken.Baker@walmart.com	Wal-Mart Stores, Inc.	2001 SE 10th St.	Electronic Service	No	OFF_SL_17-533_M-17-533
				Bentonville, AR 72716-5530			
James J.	Bertrand	james.bertrand@stinson.co	STINSON LLP	50 S 6th St Ste 2600	Electronic Service	No	OFF_SL_17-533_M-17-533
				Minneapolis, MN 55402			
Brenda A.	Bjorklund	brenda.bjorklund@centerp ointenergy.com	CenterPoint Energy	505 Nicollet Mall	Electronic Service	No	OFF_SL_17-533_M-17-533
				Minneapolis, MN 55402			
C. lan	Brown	office@gasworkerslocal340 .com	United Association	Gas Workers Local 340 312 Central Ave SW Minneapolis, MN 55414	Electronic Service	No	OFF_SL_17-533_M-17-533
James	Canaday	james.canaday@ag.state. mn.us	Office of the Attorney General-RUD	Suite 1400 445 Minnesota St. St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_17-533_M-17-533
Steve W.	Chriss	Stephen.chriss@walmart.c om	Wal-Mart	2001 SE 10th St. Bentonville,	Electronic Service	No	OFF_SL_17-533_M-17-533
				AR 72716-5530			
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.st ate.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1800	Electronic Service	Yes	OFF_SL_17-533_M-17-533
				St. Paul, MN 55101			
Marie	Doyle	marie.doyle@centerpointen ergy.com	CenterPoint Energy	505 Nicollet Mall P O Box 59038 Minneapolis, MN 554590038	Electronic Service	No	OFF_SL_17-533_M-17-533

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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_17-533_M-17-533
Edward	Garvey	garveyed@aol.com	Residence	32 Lawton St Saint Paul, MN 55102	Electronic Service	No	OFF_SL_17-533_M-17-533
Robert	Harding	robert.harding@state.mn.u s	Public Utilities Commission	Suite 350 121 7th Place East St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_17-533_M-17-533
Annete	Henkel	mui@mnutilityinvestors.org	Minnesota Utility Investors	413 Wacouta Street #230 St.Paul, MN 55101	Electronic Service	No	OFF_SL_17-533_M-17-533
Bruce L.	Hoffarber	bhoffarber@kinectenergy.c om	Kinect Energy Group	605 North Highway 169 Ste 1200 Plymouth, MN 55441	Electronic Service	No	OFF_SL_17-533_M-17-533
Mary	Holly	mholly@winthrop.com	Winthrop & Weinstine, P.A.	225 S Sixth St Ste 3500 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_17-533_M-17-533
Linda	Jensen	linda.s.jensen@ag.state.m n.us	Office of the Attorney General-DOC	1800 BRM Tower 445 Minnesota Street St. Paul, MN 551012134	Electronic Service	Yes	OFF_SL_17-533_M-17-533
Nicolle	Kupser	nkupser@greatermngas.co m	Greater Minnesota Gas, Inc.	202 South Main Street P.O. Box 68 Le Sueur, MN 56058	Electronic Service	No	OFF_SL_17-533_M-17-533
Daniel	LeFevers	dlefevers@gti.energy	GTI	1700 S Mount Prospect Rd Des Plains, IL 60018	Electronic Service	No	OFF_SL_17-533_M-17-533

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Amber	Lee	Amber.Lee@centerpointen ergy.com	CenterPoint Energy	505 Nicollet Mall Minneapolis, MN 55402	Electronic Service	No	OFF_SL_17-533_M-17-533
Roger	Leider	roger@mnpropane.org	Minnesota Propane Association	PO Box 220 209 N Run River Dr Princeton, MN 55371	Electronic Service	No	OFF_SL_17-533_M-17-533
Eric	Lipman	eric.lipman@state.mn.us	Office of Administrative Hearings	PO Box 64620 St. Paul, MN 551640620	Electronic Service	No	OFF_SL_17-533_M-17-533
Michael	Loeffler	mike.loeffler@nngco.com	Northern Natural Gas Co.	CORP HQ, 714 1111 So. 103rd Street Omaha, NE 681241000	Electronic Service	No	OFF_SL_17-533_M-17-533
Peter	Madsen	peter.madsen@ag.state.m n.us	Office of the Attorney General-DOC	Bremer Tower, Suite 1800 445 Minnesota Street St. Paul, Minnesota 551017741	Electronic Service	Yes	OFF_SL_17-533_M-17-533
Pam	Marshall	pam@energycents.org	Energy CENTS Coalition	823 7th St E St. Paul, MN 55106	Electronic Service	No	OFF_SL_17-533_M-17-533
Joseph	Meyer	joseph.meyer@ag.state.mn .us	Office of the Attorney General-RUD	Bremer Tower, Suite 1400 445 Minnesota Street St Paul, MN 55101-2131	Electronic Service	No	OFF_SL_17-533_M-17-533
David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022093	Electronic Service	No	OFF_SL_17-533_M-17-533
Andrew	Moratzka	andrew.moratzka@stoel.co m	Stoel Rives LLP	33 South Sixth St Ste 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_17-533_M-17-533
Mike	OConnor	moconnor@ibewlocal949.o rg	Local 949 IBEW	12908 Nicollet Ave S Burnsville, MN 55337	Electronic Service	No	OFF_SL_17-533_M-17-533

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Greg	Palmer	gpalmer@greatermngas.co m	Greater Minnesota Gas, Inc.	PO Box 68 202 South Main Street Le Sueur, MN 56058	Electronic Service	No	OFF_SL_17-533_M-17-533
Generic Notice	Residential Utilities Division	residential.utilities@ag.stat e.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_17-533_M-17-533
LauraSue	Schlatter	LauraSue.Schlatter@state. mn.us	Office of Administrative Hearings	PO Box 64620 St. Paul, MN 55164-0620	Electronic Service	Yes	OFF_SL_17-533_M-17-533
Janet	Shaddix Elling	jshaddix@janetshaddix.co m	Shaddix And Associates	7400 Lyndale Ave S Ste 190 Richfield, MN 55423	Electronic Service	Yes	OFF_SL_17-533_M-17-533
Peggy	Sorum	peggy.sorum@centerpointe nergy.com	CenterPoint Energy	505 Nicollet Mall Minneapolis, MN 55402	Electronic Service	No	OFF_SL_17-533_M-17-533
James M	Strommen	jstrommen@kennedy- graven.com	Kennedy & Graven, Chartered	200 S 6th St Ste 470 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_17-533_M-17-533
Eric	Swanson	eswanson@winthrop.com	Winthrop & Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	Yes	OFF_SL_17-533_M-17-533
Samantha	Williams	swilliams@nrdc.org	Natural Resources Defense Council	20 N. Wacker Drive Ste 1600 Chicago, IL 60606	Electronic Service	No	OFF_SL_17-533_M-17-533
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_17-533_M-17-533

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Jonathan	Wolfgram	Jonathan.Wolfgram@state. mn.us		Minnesota Department of Public Safety 445 Minnesota Street 147 St. Paul, MN 55101-1547		No	OFF_SL_17-533_M-17-533
Scott	Zemke	szemke@capsh.org	Community Action Partnership	of Suburban Hennepin 8800 Highway 7, Ste. St. Louis Park, MN 55426	Electronic Service 401	No	OFF_SL_17-533_M-17-533

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.st ate.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
Marie	Doyle	marie.doyle@centerpointen ergy.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.c om	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.co m	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
Greg	Palmer	gpalmer@greatermngas.co m	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 FL 7 Minneapolis, MN 55401	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
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
Generic Notice	Residential Utilities Division	residential.utilities@ag.stat e.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
Peggy	Sorum	peggy.sorum@centerpointe nergy.com	CenterPoint Energy	505 Nicollet Mall Minneapolis, MN 55402	Electronic Service	No	OFF_SL_18-374_AA-18- 374
Kristin	Stastny	kstastny@briggs.com	Briggs and Morgan, P.A.	2200 IDS Center 80 South 8th Street Minneapolis, MN 55402	Electronic Service	No	OFF_SL_18-374_AA-18- 374
Lynnette	Sweet	Regulatory.records@xcele nergy.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@wecenergygr oup.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
David	Aafedt	daafedt@winthrop.com	Winthrop & Weinstine, P.A.	Suite 3500, 225 South Sixth Street Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_18-462_M-18-462
Tamie A.	Aberle	tamie.aberle@mdu.com	Great Plains Natural Gas Co.	400 North Fourth Street Bismarck, ND 585014092	Electronic Service	No	OFF_SL_18-462_M-18-462
Kristine	Anderson	kanderson@greatermngas. com	Greater Minnesota Gas, Inc.	202 S. Main Street Le Sueur, MN 56058	Electronic Service	No	OFF_SL_18-462_M-18-462
Kenneth	Baker	Ken.Baker@walmart.com	Wal-Mart Stores, Inc.	2001 SE 10th St. Bentonville, AR 72716-5530	Electronic Service	No	OFF_SL_18-462_M-18-462
Carolyn	Berninger	cberninger@mncenter.org	Minnesota Center for Environmental Advocacy	26 E. Exchange St., Suite 206 St. Paul, MN 55101	Electronic Service	No	OFF_SL_18-462_M-18-462
James J.	Bertrand	james.bertrand@stinson.co m	STINSON LLP	50 S 6th St Ste 2600 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_18-462_M-18-462
Brenda A.	Bjorklund	brenda.bjorklund@centerp ointenergy.com	CenterPoint Energy	505 Nicollet Mall Minneapolis, MN 55402	Electronic Service	No	OFF_SL_18-462_M-18-462
Lizzie	Brodeen Kuo	lbrodeen-kuo@kennedy- graven.com	Kennedy & Graven	470 US Bank Plaza 200 S Sixth St Minneapolis, MN 55402	Electronic Service	No	OFF_SL_18-462_M-18-462
C. lan	Brown	office@gasworkerslocal340 .com	United Association	Gas Workers Local 340 312 Central Ave SW Minneapolis, MN 55414	Electronic Service	No	OFF_SL_18-462_M-18-462
James	Canaday	james.canaday@ag.state. mn.us	Office of the Attorney General-RUD	Suite 1400 445 Minnesota St. St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_18-462_M-18-462

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Melodee	Carlson Chang	melodee.carlsonchang@ce nterpointenergy.com	CenterPoint Energy	505 Nicollet Mall Minneapolis, MN 55402	Electronic Service	No	OFF_SL_18-462_M-18-462
Steve W.	Chriss	Stephen.chriss@walmart.c	Wal-Mart	2001 SE 10th St. Bentonville, AR 72716-5530	Electronic Service	No	OFF_SL_18-462_M-18-462
Steven	Clay	Steven.Clay@CenterPoint Energy.com	CenterPoint Energy Minnesota Gas	505 Nicollet Mall Minneapolis, MN 55402	Electronic Service	No	OFF_SL_18-462_M-18-462
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.st ate.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1800 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_18-462_M-18-462
Marie	Doyle	marie.doyle@centerpointen ergy.com	CenterPoint Energy	505 Nicollet Mall P O Box 59038 Minneapolis, MN 554590038	Electronic Service	No	OFF_SL_18-462_M-18-462
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_18-462_M-18-462
Edward	Garvey	garveyed@aol.com	Residence	32 Lawton St Saint Paul, MN 55102	Electronic Service	No	OFF_SL_18-462_M-18-462
Robert	Harding	robert.harding@state.mn.u s	Public Utilities Commission	Suite 350 121 7th Place East St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_18-462_M-18-462
Annete	Henkel	mui@mnutilityinvestors.org	Minnesota Utility Investors	413 Wacouta Street #230 St.Paul, MN 55101	Electronic Service	No	OFF_SL_18-462_M-18-462

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Katherine	Hinderlie	katherine.hinderlie@ag.stat e.mn.us	Office of the Attorney General-DOC	445 Minnesota St Suite 1800 St. Paul, MN 55101-2134	Electronic Service	Yes	OFF_SL_18-462_M-18-462
Bruce L.	Hoffarber	bhoffarber@kinectenergy.c om	Kinect Energy Group	605 North Highway 169 Ste 1200 Plymouth, MN 55441	Electronic Service	No	OFF_SL_18-462_M-18-462
Mary	Holly	mholly@winthrop.com	Winthrop & Weinstine, P.A.	225 S Sixth St Ste 3500 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_18-462_M-18-462
Linda	Jensen	linda.s.jensen@ag.state.m n.us	Office of the Attorney General-DOC	1800 BRM Tower 445 Minnesota Street St. Paul, MN 551012134	Electronic Service	Yes	OFF_SL_18-462_M-18-462
Nicolle	Kupser	nkupser@greatermngas.co m	Greater Minnesota Gas, Inc.	202 South Main Street P.O. Box 68 Le Sueur, MN 56058	Electronic Service	No	OFF_SL_18-462_M-18-462
Daniel	LeFevers	dlefevers@gti.energy	GTI	1700 S Mount Prospect Rd Des Plains, IL 60018	Electronic Service	No	OFF_SL_18-462_M-18-462
Amber	Lee	Amber.Lee@centerpointen ergy.com	CenterPoint Energy	505 Nicollet Mall Minneapolis, MN 55402	Electronic Service	No	OFF_SL_18-462_M-18-462
Roger	Leider	roger@mnpropane.org	Minnesota Propane Association	PO Box 220 209 N Run River Dr Princeton, MN 55371	Electronic Service	No	OFF_SL_18-462_M-18-462
Eric	Lindberg	elindberg@mncenter.org	Minnesota Center for Environmental Advocacy	1919 University Avenue West Suite 515 Saint Paul, MN 55104-3435	Electronic Service	No	OFF_SL_18-462_M-18-462

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Eric	Lipman	eric.lipman@state.mn.us	Office of Administrative Hearings	PO Box 64620 St. Paul, MN 551640620	Electronic Service	No	OFF_SL_18-462_M-18-462
Michael	Loeffler	mike.loeffler@nngco.com	Northern Natural Gas Co.	CORP HQ, 714 1111 So. 103rd Street Omaha, NE 681241000	Electronic Service	No	OFF_SL_18-462_M-18-462
Peter	Madsen	peter.madsen@ag.state.m n.us	Office of the Attorney General-DOC	Bremer Tower, Suite 1800 445 Minnesota Street St. Paul, Minnesota 551017741	Electronic Service	Yes	OFF_SL_18-462_M-18-462
Pam	Marshall	pam@energycents.org	Energy CENTS Coalition	823 7th St E St. Paul, MN 55106	Electronic Service	No	OFF_SL_18-462_M-18-462
Joseph	Meyer	joseph.meyer@ag.state.mn .us	Office of the Attorney General-RUD	Bremer Tower, Suite 1400 445 Minnesota Street St Paul, MN 55101-2131	Electronic Service	Yes	OFF_SL_18-462_M-18-462
David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022093	Electronic Service	No	OFF_SL_18-462_M-18-462
Andrew	Moratzka	andrew.moratzka@stoel.co m	Stoel Rives LLP	33 South Sixth St Ste 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_18-462_M-18-462
Samantha	Norris	samanthanorris@alliantene rgy.com	Interstate Power and Light Company	200 1st Street SE PO Box 351 Cedar Rapids, IA 524060351	Electronic Service	No	OFF_SL_18-462_M-18-462
Mike	OConnor	moconnor@ibewlocal949.o rg	Local 949 IBEW	12908 Nicollet Ave S Burnsville, MN 55337	Electronic Service	No	OFF_SL_18-462_M-18-462
Jeff	Oxley	jeff.oxley@state.mn.us	Office of Administrative Hearings	600 North Robert Street St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_18-462_M-18-462

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Greg	Palmer	gpalmer@greatermngas.co m	Greater Minnesota Gas, Inc.	PO Box 68 202 South Main Stree Le Sueur, MN 56058	Electronic Service	No	OFF_SL_18-462_M-18-462
Generic Notice	Residential Utilities Division	residential.utilities@ag.stat e.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_18-462_M-18-462
Kevin	Reuther	kreuther@mncenter.org	MN Center for Environmental Advocacy	26 E Exchange St, Ste 206 St. Paul, MN 551011667	Electronic Service	No	OFF_SL_18-462_M-18-462
LauraSue	Schlatter	LauraSue.Schlatter@state.mn.us	Office of Administrative Hearings	PO Box 64620 St. Paul, MN 55164-0620	Electronic Service	Yes	OFF_SL_18-462_M-18-462
Elizabeth	Schmiesing	eschmiesing@winthrop.co m	Winthrop & Weinstine, P.A.	225 South Sixth Street Suite 3500 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_18-462_M-18-462
Janet	Shaddix Elling	jshaddix@janetshaddix.co m	Shaddix And Associates	7400 Lyndale Ave S Ste 190 Richfield, MN 55423	Electronic Service	Yes	OFF_SL_18-462_M-18-462
Peggy	Sorum	peggy.sorum@centerpointe nergy.com	CenterPoint Energy	505 Nicollet Mall Minneapolis, MN 55402	Electronic Service	No	OFF_SL_18-462_M-18-462
James M	Strommen	jstrommen@kennedy- graven.com	Kennedy & Graven, Chartered	200 S 6th St Ste 470 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_18-462_M-18-462
Eric	Swanson	eswanson@winthrop.com	Winthrop & Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_18-462_M-18-462
Samantha	Williams	swilliams@nrdc.org	Natural Resources Defense Council	20 N. Wacker Drive Ste 1600 Chicago, IL 60606	Electronic Service	No	OFF_SL_18-462_M-18-462

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Joseph	Windler	jwindler@winthrop.com	Winthrop & Weinstine	225 South Sixth Street, Suite 3500 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_18-462_M-18-462
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_18-462_M-18-462
Jonathan	Wolfgram	Jonathan.Wolfgram@state. mn.us	Office of Pipeline Safety	Minnesota Department of Public Safety 445 Minnesota Street 147 St. Paul, MN 55101-1547	Electronic Service Suite	No	OFF_SL_18-462_M-18-462
Scott	Zemke	szemke@capsh.org	Community Action Partnership	of Suburban Hennepin 8800 Highway 7, Ste. St. Louis Park, MN 55426	Electronic Service 401	No	OFF_SL_18-462_M-18-462

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
David	Aafedt	daafedt@winthrop.com	Winthrop & Weinstine, P.A.	Suite 3500, 225 South Sixth Street Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_18-573_AA-18- 573
Tamie A.	Aberle	tamie.aberle@mdu.com	Great Plains Natural Gas Co.	400 North Fourth Street Bismarck, ND 585014092	Electronic Service	No	OFF_SL_18-573_AA-18- 573
Kristine	Anderson	kanderson@greatermngas. com	Greater Minnesota Gas, Inc.	202 S. Main Street Le Sueur, MN 56058	Electronic Service	No	OFF_SL_18-573_AA-18- 573
Kenneth	Baker	Ken.Baker@walmart.com	Wal-Mart Stores, Inc.	2001 SE 10th St. Bentonville, AR 72716-5530	Electronic Service	No	OFF_SL_18-573_AA-18- 573
Carolyn	Berninger	cberninger@mncenter.org	Minnesota Center for Environmental Advocacy	26 E. Exchange St., Suite 206 St. Paul, MN 55101	Electronic Service	No	OFF_SL_18-573_AA-18- 573
James J.	Bertrand	james.bertrand@stinson.co m	STINSON LLP	50 S 6th St Ste 2600 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_18-573_AA-18- 573
Brenda A.	Bjorklund	brenda.bjorklund@centerp ointenergy.com	CenterPoint Energy	505 Nicollet Mall Minneapolis, MN 55402	Electronic Service	No	OFF_SL_18-573_AA-18- 573
Lizzie	Brodeen Kuo	lbrodeen-kuo@kennedy- graven.com	Kennedy & Graven	470 US Bank Plaza 200 S Sixth St Minneapolis, MN 55402	Electronic Service	No	OFF_SL_18-573_AA-18- 573
C. lan	Brown	office@gasworkerslocal340 .com	United Association	Gas Workers Local 340 312 Central Ave SW Minneapolis, MN 55414	Electronic Service	No	OFF_SL_18-573_AA-18- 573
James	Canaday	james.canaday@ag.state. mn.us	Office of the Attorney General-RUD	Suite 1400 445 Minnesota St. St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_18-573_AA-18- 573

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Steve W.	Chriss	Stephen.chriss@walmart.c	Wal-Mart	2001 SE 10th St. Bentonville, AR 72716-5530	Electronic Service	No	OFF_SL_18-573_AA-18- 573
Steven	Clay	Steven.Clay@CenterPoint Energy.com	CenterPoint Energy Minnesota Gas	505 Nicollet Mall Minneapolis, MN 55402	Electronic Service	No	OFF_SL_18-573_AA-18- 573
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.st ate.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1800 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_18-573_AA-18- 573
Marie	Doyle	marie.doyle@centerpointen ergy.com	CenterPoint Energy	505 Nicollet Mall P O Box 59038 Minneapolis, MN 554590038	Electronic Service	No	OFF_SL_18-573_AA-18- 573
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_18-573_AA-18- 573
Brian	Gardow	bgardow@greatermngas.c om	Greater Minnesota Gas, Inc.	PO Box 68 Le Sueur, MN 56058	Electronic Service	No	OFF_SL_18-573_AA-18- 573
Edward	Garvey	garveyed@aol.com	Residence	32 Lawton St Saint Paul, MN 55102	Electronic Service	No	OFF_SL_18-573_AA-18- 573
Robert	Harding	robert.harding@state.mn.u s	Public Utilities Commission	Suite 350 121 7th Place East St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_18-573_AA-18- 573
Annete	Henkel	mui@mnutilityinvestors.org	Minnesota Utility Investors	413 Wacouta Street #230 St.Paul, MN 55101	Electronic Service	No	OFF_SL_18-573_AA-18- 573

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Katherine	Hinderlie	katherine.hinderlie@ag.stat e.mn.us	Office of the Attorney General-DOC	445 Minnesota St Suite 1800 St. Paul, MN 55101-2134	Electronic Service	Yes	OFF_SL_18-573_AA-18- 573
Bruce L.	Hoffarber	bhoffarber@kinectenergy.c om	Kinect Energy Group	605 North Highway 169 Ste 1200 Plymouth, MN 55441	Electronic Service	No	OFF_SL_18-573_AA-18- 573
Mary	Holly	mholly@winthrop.com	Winthrop & Weinstine, P.A.	225 S Sixth St Ste 3500 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_18-573_AA-18- 573
Linda	Jensen	linda.s.jensen@ag.state.m n.us	Office of the Attorney General-DOC	1800 BRM Tower 445 Minnesota Street St. Paul, MN 551012134	Electronic Service	Yes	OFF_SL_18-573_AA-18- 573
Nicolle	Kupser	nkupser@greatermngas.co m	Greater Minnesota Gas, Inc.	202 South Main Street P.O. Box 68 Le Sueur, MN 56058	Electronic Service	No	OFF_SL_18-573_AA-18- 573
Daniel	LeFevers	dlefevers@gti.energy	GTI	1700 S Mount Prospect Rd Des Plains, IL 60018	Electronic Service	No	OFF_SL_18-573_AA-18- 573
Amber	Lee	Amber.Lee@centerpointen ergy.com	CenterPoint Energy	505 Nicollet Mall Minneapolis, MN 55402	Electronic Service	No	OFF_SL_18-573_AA-18- 573
Roger	Leider	roger@mnpropane.org	Minnesota Propane Association	PO Box 220 209 N Run River Dr Princeton, MN 55371	Electronic Service	No	OFF_SL_18-573_AA-18- 573
Eric	Lindberg	elindberg@mncenter.org	Minnesota Center for Environmental Advocacy	1919 University Avenue West Suite 515 Saint Paul, MN 55104-3435	Electronic Service	No	OFF_SL_18-573_AA-18- 573

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Eric	Lipman	eric.lipman@state.mn.us	Office of Administrative Hearings	PO Box 64620 St. Paul, MN 551640620	Electronic Service	No	OFF_SL_18-573_AA-18- 573
Michael	Loeffler	mike.loeffler@nngco.com	Northern Natural Gas Co.	CORP HQ, 714 1111 So. 103rd Street Omaha, NE 681241000	Electronic Service	No	OFF_SL_18-573_AA-18- 573
Peter	Madsen	peter.madsen@ag.state.m n.us	Office of the Attorney General-DOC	Bremer Tower, Suite 1800 445 Minnesota Street St. Paul, Minnesota 551017741	Electronic Service	Yes	OFF_SL_18-573_AA-18- 573
Pam	Marshall	pam@energycents.org	Energy CENTS Coalition	823 7th St E St. Paul, MN 55106	Electronic Service	No	OFF_SL_18-573_AA-18- 573
Joseph	Meyer	joseph.meyer@ag.state.mn .us	Office of the Attorney General-RUD	Bremer Tower, Suite 1400 445 Minnesota Street St Paul, MN 55101-2131	Electronic Service	Yes	OFF_SL_18-573_AA-18- 573
David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022093	Electronic Service	No	OFF_SL_18-573_AA-18- 573
Andrew	Moratzka	andrew.moratzka@stoel.co m	Stoel Rives LLP	33 South Sixth St Ste 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_18-573_AA-18- 573
Samantha	Norris	samanthanorris@alliantene rgy.com	Interstate Power and Light Company	200 1st Street SE PO Box 351 Cedar Rapids, IA 524060351	Electronic Service	No	OFF_SL_18-573_AA-18- 573
Mike	OConnor	moconnor@ibewlocal949.o rg	Local 949 IBEW	12908 Nicollet Ave S Burnsville, MN 55337	Electronic Service	No	OFF_SL_18-573_AA-18- 573
Jeff	Oxley	jeff.oxley@state.mn.us	Office of Administrative Hearings	600 North Robert Street St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_18-573_AA-18- 573

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Greg	Palmer	gpalmer@greatermngas.co m	Greater Minnesota Gas, Inc.	PO Box 68 202 South Main Stree Le Sueur, MN 56058	Electronic Service	No	OFF_SL_18-573_AA-18- 573
Lisa	Peterson	lisa.r.peterson@xcelenergy .com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_18-573_AA-18- 573
Catherine	Phillips	catherine.phillips@we- energies.com	We Energies	231 West Michigan St Milwaukee, WI 53203	Electronic Service	No	OFF_SL_18-573_AA-18- 573
Generic Notice	Residential Utilities Division	residential.utilities@ag.stat e.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_18-573_AA-18- 573
Kevin	Reuther	kreuther@mncenter.org	MN Center for Environmental Advocacy	26 E Exchange St, Ste 206 St. Paul, MN 551011667	Electronic Service	No	OFF_SL_18-573_AA-18- 573
LauraSue	Schlatter	LauraSue.Schlatter@state. mn.us	Office of Administrative Hearings	PO Box 64620 St. Paul, MN 55164-0620	Electronic Service	Yes	OFF_SL_18-573_AA-18- 573
Elizabeth	Schmiesing	eschmiesing@winthrop.co m	Winthrop & Weinstine, P.A.	225 South Sixth Street Suite 3500 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_18-573_AA-18- 573
Janet	Shaddix Elling	jshaddix@janetshaddix.co m	Shaddix And Associates	7400 Lyndale Ave S Ste 190 Richfield, MN 55423	Electronic Service	Yes	OFF_SL_18-573_AA-18- 573
Peggy	Sorum	peggy.sorum@centerpointe nergy.com	CenterPoint Energy	505 Nicollet Mall Minneapolis, MN 55402	Electronic Service	No	OFF_SL_18-573_AA-18- 573
Kristin	Stastny	kstastny@briggs.com	Briggs and Morgan, P.A.	2200 IDS Center 80 South 8th Street Minneapolis, MN 55402	Electronic Service	No	OFF_SL_18-573_AA-18- 573

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
James M	Strommen	jstrommen@kennedy- graven.com	Kennedy & Graven, Chartered	200 S 6th St Ste 470 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_18-573_AA-18- 573
Eric	Swanson	eswanson@winthrop.com	Winthrop & Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_18-573_AA-18- 573
Lynnette	Sweet	Regulatory.records@xcele nergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_18-573_AA-18- 573
Samantha	Williams	swilliams@nrdc.org	Natural Resources Defense Council	20 N. Wacker Drive Ste 1600 Chicago, IL 60606	Electronic Service	No	OFF_SL_18-573_AA-18- 573
Joseph	Windler	jwindler@winthrop.com	Winthrop & Weinstine	225 South Sixth Street, Suite 3500 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_18-573_AA-18- 573
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_18-573_AA-18- 573
Jonathan	Wolfgram	Jonathan.Wolfgram@state. mn.us	Office of Pipeline Safety	Minnesota Department of Public Safety 445 Minnesota Street 147 St. Paul, MN 55101-1547	Electronic Service Suite	No	OFF_SL_18-573_AA-18- 573
Mary	Wolter	mary.wolter@wecenergygr oup.com	Minnesota Energy Resources Corporation (HOLDING)	231 West Michigan St Milwaukee, WI 53203	Electronic Service	No	OFF_SL_18-573_AA-18- 573
Scott	Zemke	szemke@capsh.org	Community Action Partnership	of Suburban Hennepin 8800 Highway 7, Ste. St. Louis Park, MN 55426	Electronic Service 401	No	OFF_SL_18-573_AA-18- 573