



30 West Superior Street
Duluth, MN 55802-2093
www.mnpower.com



March 2, 2020

VIA E-FILING

Will Seuffert
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101-2147

Re: In the Matter of an Investigation into Self-Commitment and Self-Scheduling of
Large Baseload Generation Facilities
Docket No. E999/CI-19-704
Annual Compliance Filing

Dear Mr. Seuffert:

Minnesota Power respectfully submits its annual compliance filing in pursuant to the Minnesota Public Utilities Commission Order dated November 13, 2019, in Docket No. E999/AA-18-373.

Various attachments to this filing contain information Minnesota Power considers Trade Secret. The Company believes this filing comports with the Minnesota Public Utilities Commission's Notice relating to Revised Procedures for handling Trade Secret and Privileged Data, pursuant to Minn. Rule 7829.0500. As required by the revised procedures, a statement providing the justification for excising the trade secret data is attached to this letter.

Please contact me at (218) 355-3455 or hcreurer@allte.com if you have any questions regarding this compliance filing.

Yours truly,

Hillary A. Creurer
Regulatory Compliance Administrator

HAC:th
Attach.

**STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION**

In the Matter of an Investigation into
Self-Commitment and Self-Scheduling of
Large Baseload Generation Facilities

Docket No. E999/CI-19-704
**MINNESOTA POWER'S
COMPLIANCE FILING**

I. INTRODUCTION

On February 7, 2019, the Minnesota Public Utilities Commission (“Commission”) issued an Order in the Annual Automatic Adjustment (“AAA”) docket¹ requiring Minnesota Power, Otter Tail Power, and Xcel Energy to provide a complete analysis and discussion of the consequences of self-commitment and self-scheduling of their generators in future AAA reports. In the 2017-2018 AAA² (“FYE 18 AAA”) Order the Commission opened a separate docket³ for the Self-Commitment and Self-Scheduling investigation to provide a more focused forum for these issues and provided more clarity in the information to include in the analysis. Minnesota Power (or the “Company”) provides this compliance filing in response to the Commission Order dated November 13, 2019.

II. INFORMATION REQUESTED FROM THE UTILITIES

On November 13, 2019, the Commission issued an Order Accepting the FYE 18 AAA and Setting Additional Requirements. The following FYE 18 AAA Order Points detail out the requirements for the annual self-commitment and self-scheduling analysis:

Order Point 8 states: *“Minnesota Power, Otter Tail, and Xcel shall submit an annual compliance filing analyzing the potential options for seasonal dispatch generally, and potential options and strategies for utilizing “economic” commitments for specific coal-fired generating plants. The utilities shall include a specific explanation of barriers or limitations to each of these potential options, including but not limited to technical limits of the units and contract requirements (shared ownership, steam offtake contracts,*

¹ Docket No. E999/AA-17-492, Order dated February 7, 2019

² Docket No. E999/AA-18-373, Order dated November 13, 2019

³ Docket No. E999/CI-19-704

minimum fuel supply requirements, etc.) as relevant, on March 1, 2020, and each year thereafter.”

Order Point 9 states: “The Commission will open an investigation in a separate docket and require Minnesota Power, Otter Tail, and Xcel to report their future self-commitment and self-scheduling analyses using a consistent methodology by including fuel cost and variable O&M costs, matching the offer curve submitted to MISO energy markets.”

Order Point 10 states: “In the investigation docket, Minnesota Power, Otter Tail, and Xcel shall provide stakeholders with the underlying data (work papers) used to complete their analyses, in a live Excel spread sheet, including, at minimum, the data points listed below for each generating unit, with the understanding that this may include protected data.

Hourly data for all units:

- a. Date and hour*
- b. Commit status (Null / Economic / Emergency / Must Run / Outage / Not Participating)*
- c. Dispatch Status for Energy (Null / Economic / Self Schedule)*
- d. Cleared MW*
- e. Day ahead locational marginal price at unit node*
- f. Real time MW adjustment*
- g. Real time locational marginal price at unit node*
- h. Day ahead dispatch minimum*
- i. Real time dispatch minimum*
- j. Fuel cost (\$/MWh)*
- k. Variable operations and maintenance costs (\$/MWh)*
- l. Day ahead locational marginal price representative of utility load zone*
- m. Real time locational marginal price representative of utility load zone*
- n. Whether Day Ahead Cleared = Day Ahead Dispatch Minimum (0 or 1)*
- o. Actual production in MWh (for all 8,760 hours of the year)*
- p. Day ahead MISO payment*
- q. Real time MISO payment*
- r. Net MISO energy payment*
- s. Production costs $((J+K) * O)$*
- t. Net cost or benefit $(R-S)$*

Monthly or annual data for all units:

- u. Revenue from ancillary services (monthly)*
- v. Fixed operations and maintenance costs (preferably monthly) or reasonable estimates in approximation thereof*
- w. Capital revenue requirements (annual) or reasonable estimates in approximation thereof*

- x. Average heat rate at economic minimum*
- y. Average heat rate at economic maximum”*

Minnesota Power submits this compliance filing to comply with Order Points listed above.

III. COMPANY ANALYSIS

Minnesota Power appreciates the Self-Commitment and Self-Scheduling of Large Baseload Generation Facilities inquiry from the Commission to allow all stakeholders a better understanding of how the utilities operate their steam generation in the Midcontinent Independent System Operator (“MISO”) market and the corresponding benefits the customers receive.

Minnesota Power optimizes its resource portfolio within the MISO market structure to ensure efficient utilization of its generation portfolio. The Boswell facility is approximately 1000 MW⁴ baseload generation asset that provides reliable, efficient, low cost energy to customers. Minnesota Power utilizes the self-commitment⁵ provisions in the MISO tariff to ensure this resource is utilized to serve customer energy needs reliably and cost effectively all hours of the year as part of its broader resource plan and based on its physical capabilities to produce energy.

The Company evaluates its energy market strategy and market performance for its generation portfolio on a regular basis to ensure the assets are providing value to customers within the MISO market construct. If the Company receives a signal that the current market strategy is no longer providing value to customers, then the strategy is reevaluated.

When a significant change occurs on the transmission system, such as a change in the operational characteristics of a transmission line, generator, or an extended outage of a facility, it is important that the Company and the regional reliability coordinator, MISO, coordinate to have a plan and procedures in place to address risks to operational reliability. The Company works closely with MISO staff to develop an understanding of

⁴ The “approximately 1000 MW” includes WPPI Energy 20 percent ownership of Boswell Unit 4.

⁵ Minnesota Power defines Self-Commitment (also known as Must Run) as a resource that has been committed in the market and available for dispatch by MISO. Self-Scheduling is defined as MW amount scheduled in the market.

what type of real-time operating procedures and criteria are currently in place and what would be needed to ensure both regional and local reliability are preserved to manage the changes in the system. As new operational alternatives are considered for Boswell, Minnesota Power will be consulting with MISO to support the consideration of these factors.

As provided in the analysis and descriptions below, the Boswell facility provided \$32.0 million in net energy benefit to customers for the period of July 1, 2018 through December 31, 2019. The analysis evaluated all the hours in each year where the unit was online producing energy and self-committed, and compares the fuel and variable O&M cost to operate versus the payments Minnesota Power received from the MISO market during these same periods. On an annual basis, the Boswell facility realized a net positive benefit for customers when operating in both the on-peak and off-peak hours. The customers benefited from the flexible operations at Boswell that includes backing down during lower market conditions, but being available to increase generation to avoid purchasing higher cost energy in the market. The analysis demonstrates Minnesota Power is utilizing the MISO tariff and the self-commitment provisions at the Boswell facility to serve its customers in an effective manner.

It is important to highlight Minnesota Power's wind generation, although not part of the analysis, experiences an immaterial level of curtailment, resulting in zero cost renewable energy available to serve customer load. Minnesota Power is committed to transforming its generating fleet and will provide its customers 50 percent renewable energy by 2021.

A. MISO Energy Market Offer

Minnesota Power participates in the MISO Day-Ahead and Real-Time energy markets by offering its power supply for dispatch in the MISO energy market. The generation resources Minnesota Power offers into the Market include coal, biomass, wind, hydro, and natural gas. Each generating unit has different operating parameters, such as cost to produce energy, start up, ramp rate, minimum down time, minimum time online, and other parameters that are taken into consideration as part of the energy offer. To help ensure least cost supply for customers, Minnesota Power continuously evaluates its

offer parameters to ensure the latest fuel cost is used, the appropriate MISO energy products are being utilized, and the operating parameters reflect current capability. By optimizing Minnesota Power's generation fleet in the MISO market, customers benefit by receiving the market benefits of the resources.

On a daily basis, Minnesota Power must also comply with MISO's Resource Adequacy requirements by offering its capacity resources that either clear the annual Planning Resource Auction or are used in the annual Company Fixed Resource Adequacy Plan ("FRAP"). This offer ensures the energy needed each day to maintain reliability is available to MISO for dispatch. The Boswell units are used to meet Minnesota Power resource adequacy requirements and, therefore, are required to offer the available energy for dispatch each day.

The self-commitment status combined with allowing MISO to dispatch the Boswell facility economically between its minimum and maximum capability is currently the least cost strategy for Minnesota Power customers as demonstrated by the evaluation contained in this filing. The self-commitment designates the resource as committed to being online and producing energy for the region at its minimum levels. It also ensures the resource is online and available to increase dispatch to avoid purchasing higher cost energy for customers or to maintain reliability in the region.

B. Boswell Operating and System Considerations

Boswell Units 3 & 4 are the backbone of Minnesota Power's power supply that serves customers' energy needs and provide essential reliability services to the region when online and producing energy. The facility is the single largest generating source in the upper half of Minnesota, eastern North Dakota and Northern Wisconsin. The Boswell facility is also among the largest employers in Itasca County. The energy from Boswell Units 3 & 4 is an essential part of the power supply (providing over 30 percent of customer energy in 2019) that provides low cost, reliable energy for our high level of 7X24 customer requirements. When evaluating moving Boswell Units 3 & 4 to economic dispatch or seasonal operations, there are several factors that need to be taken into consideration including replacement power supply, market risk, and regional reliability. Depending on the severity of these factors, there is a potential need for

capital investment in the transmission system infrastructure or at the generation facilities as well as a need to develop new operating procedures.

Minnesota Power no longer has multiple baseload facilities to call upon if Boswell Units 3 & 4 are not producing energy. Currently, the majority of the resources in this region require several hours to start-up (such as Laskin and Hibbard) or are resources that rely on the intermittent availability of wind, solar, and hydro. To rely significantly on importing energy from the MISO market into the region at an unknown energy cost creates additional risk for customers as these smaller units take time to bring online if prices increase or are needed for reliability, nor could Laskin and Hibbard replace all of the combined energy from Boswell 3 & 4 if intermittent wind, solar, and hydro were unavailable.

Furthermore, in a situation where an event occurs on the system, such as one or more transmission lines are unexpectedly out of service, Boswell Units 3 & 4 would not be readily available to provide reliability benefits as it could take up to a day or two to bring generation back online and available for generation.⁶

Economic Dispatch Evaluation

In this section Minnesota Power will discuss the progress made to-date on evaluation of the transmission system and plant readiness to move the Boswell units to economic dispatch.

A coal plant is made up of several individual systems and is required to operate within its environmental permits, all of which needs to be taken into consideration when evaluating the operating parameters in self-commit or economic operations within the MISO market. Minnesota Power has initiated an investigation into the alternative for economic dispatch to determine the potential operating conditions that exist at each Boswell unit and to identify potential solutions. At this time, it is too early in the investigative phase to report on conditions and potential solutions with any certainty. Minnesota Power will continue to consider this topic in its Integrated Resource Plan which will be filed on October 1, 2020, and next year's Self-Commitment filing.

⁶ Except in a situation where the unit is on outage.

In parallel with MISO coordination on real-time planning, the Company is beginning to evaluate the long-term local and regional transmission system impacts of moving one or both Boswell units to economic dispatch. Today, having these units online provides low-cost energy to customers, along with essential reliability services that come along with energy production. Examples of essential reliability services include voltage regulation, frequency response, system strength, local power delivery, and redundancy. The transmission system has been optimized over many decades to maximize the use of critical reliability services provided by local baseload generators. Through these transmission impact assessments and discussions with MISO, the Company will work to understand potential impacts to operational reliability from economic dispatch of the Boswell units and identify appropriate solutions. The Company will continue to consider these findings in its upcoming Integrated Resource Plan which will be filed on October 1, 2020, and next year's Self-Commitment filing.

Minnesota Power would like to highlight a shortcoming of the market data provided in this filing. A critical assumption in the data set is that if Boswell Units 3 & 4 were moved to economic dispatch the market prices would remain unchanged when the units are offline. Given these are the two largest and remaining baseload generators in the region, there will be increases in market prices within the region when the generation is offline. The net energy benefit of \$32.0 million for customers is likely understated, because it doesn't factor in that replacement energy costs will be higher if the Boswell units were offline.

Minnesota Power will continue to look for and explore additional opportunities to increase the flexible operations at Boswell Units 3 & 4. The Company is committed to identifying the impacts of economic dispatch by starting to evaluate operating conditions and identify solutions. In a situation where market conditions change and moving to economic dispatch is beneficial for customers on a continual basis, Minnesota Power will be in position with the Boswell facility and system operators to be ready for a transition. Today, utilizing the self-commitment option as allowed by the MISO tariff provides Minnesota Power's customers system support benefits, and continues to show a significant net benefit to customers.

Per the requested data in order point 10, below is a table showing the average heat rate at economic minimum and average heat rate at economic maximum for Boswell Units 3 & 4.

Table 1: Average Heat Rates

	Average Heat Rate at Economic Minimum (Btu/kWh)	Average Heat Rate at Economic Maximum (Btu/kWh)
	[TRADE SECRET DATA BEGINS]	
Boswell Unit 3		
Boswell Unit 4		
	[TRADE SECRET DATA ENDS]	

Shared Ownership

Boswell Unit 4 is a jointly owned unit with WPPI Energy. Minnesota Power owns approximately 80 percent and WPPI Energy owns approximately 20 percent. To ensure a consistent dispatch of Boswell Unit 4, Minnesota Power coordinates with WPPI on the energy market parameters. Any changes to the operations at Boswell Unit 4 need to be coordinated with WPPI Energy and agreed upon by both parties.

C. Boswell Cost Analysis

Fixed Operation and Maintenance Costs⁷

Fixed Operations and Maintenance (O&M) costs are defined as direct O&M expenses not related to fuel, reagents, fuel handling equipment incremental wear-and-tear, and ash handling costs. Table 2 below shows the fixed O&M costs attributed to Boswell Units 3 & 4.

⁷ 2019 Fixed O&M costs are considered preliminary until the FERC Form 1 is filed. Minnesota Power will submit a supplemental filing after the FERC Form 1 is filed in April 2020.

Table 2: Fixed O&M

	Boswell Unit 3	Boswell Unit 4
	[TRADE SECRET DATA BEGINS	
July-18		
August-18		
September-18		
October-18		
November-18		
December-18		
2018 Fixed O&M Cost		
January-19		
February-19		
March-19		
April-19		
May-19		
June-19		
July-19		
August-19		
September-19		
October-19		
November-19		
December-19		
2019 Fixed O&M Cost		
	TRADE SECRET DATA ENDS]	

Capital Revenue Requirements

Capital Revenue Requirements is a financial estimate of the total amount of money Minnesota Power must collect from customers to pay all costs including a reasonable return on investment in the assets. The revenue requirement for Boswell Units 3 & 4 is based on the capital investment in the facility and the financial metrics of the company such as debt rate, return on equity, taxes, and depreciation. The estimated Capital Revenue Requirements for Boswell Units 3 & 4 as of December 31, 2019 were [TRADE SECRET DATA BEGINS [REDACTED] TRADE SECRET DATA ENDS] respectively.

Ancillary Services

Eligible generation has the opportunity to make ancillary services available to the MISO market and receive payment for these services. These ancillary service products are required to ensure energy is compensated financially for being able to respond to imbalances between generation and load. The Boswell facility received \$1.0 million in

revenue for providing several ancillary service products for the period of July 1, 2018 through December 31, 2019, as shown in Table 3 below. The majority of the ancillary service revenue came from providing Regulation, which requires these units to increase or decrease generation within seconds to respond to small imbalances due to generation and load variation. This is a critical reliability service provided by these units. It is important to note that Boswell can only provide these ancillary services if the units are online and generating at minimum levels.

Table 3: Monthly Revenue from Ancillary Services

	Boswell Unit 3			Boswell Unit 4		
	Regulation	Spinning Reserve	Supplemental Reserve	Regulation	Spinning Reserve	Supplemental Reserve
	[TRADE SECRET DATA BEGINS]					
Jul-18						
Aug-18						
Sep-18						
Oct-18						
Nov-18						
Dec-18						
2018 Total						
Jan-19						
Feb-19						
Mar-19						
Apr-19						
May-19						
Jun-19						
Jul-19						
Aug-19						
Sep-19						
Oct-19						
Nov-19						
Dec-19						
2019 Total						
Total Jul-18 to Dec-19						
[TRADE SECRET DATA ENDS]						
Total Ancillary Service Revenue (July 1, 2018 – December 31, 2019)						\$ 1,014,389

D. Self-Commitment and Self-Scheduling Analysis

Minnesota Power evaluated the financial impact of self-commitment and self-scheduling for Boswell Units 3 & 4 for the requested time period. Since Boswell Units 1 & 2 were retired as of December 31, 2018, those units were excluded from the analysis. As shown in Table 4 below, Minnesota Power's self-commitment of the units resulted in a \$32.0 million net energy benefit for customers for the time period of July 1, 2018 through December 31, 2019. There was a net benefit during both on-peak and off-peak hours, with the greatest net energy benefit occurring in the on-peak hours.

The analysis evaluated all the hours in each year where the unit was online producing energy and self-committed, and compares the fuel and variable O&M cost to operate versus the payments Minnesota Power received from the MISO market during these same periods. The net cost/(benefit) was calculated in accordance with Order Point 8. If the culmination of the times the Boswell Units were self-committed created value for the customer, then the self-commit strategy is beneficial for the customer (shown as a negative value in Table 4).

Table 4: Customer Net Cost / (Benefit) When Boswell Units are Self-Scheduled*

			NET Customer Cost/(Benefit)		
		Time Period	All Hours	On-Peak /1	Off-Peak /2
(A)	BEC 3 Hours with Cost	7/1/18 - 12/31/18	\$ 758,446	\$ 136,300	\$ 622,147
(B)		1/1/19 -12/31/19	\$ 1,983,293	\$ 612,622	\$ 1,370,670
(C)	BEC 3 Hours with Benefit	7/1/18 - 12/31/18	\$ (7,893,950)	\$ (5,876,858)	\$ (2,017,092)
(D)		1/1/19 -12/31/19	\$ (8,496,321)	\$ (6,259,495)	\$ (2,236,826)
(E)	BEC 3 Net Cost / (Benefit) (A+B+C+D)		\$ (13,648,532)	\$ (11,387,431)	\$ (2,261,101)
(F)	BEC 4 Hours with Cost	7/1/18 - 12/31/18	\$ 1,216,209	\$ 191,378	\$ 1,024,831
(G)		1/1/19 -12/31/19	\$ 4,246,213	\$ 1,041,917	\$ 3,204,296
(H)	BEC 4 Hours with Benefit	7/1/18 - 12/31/18	\$ (11,108,485)	\$ (8,324,359)	\$ (2,784,125)
(I)		1/1/19 -12/31/19	\$ (12,771,945)	\$ (9,734,865)	\$ (3,037,079)
(J)	BEC 4 Net Cost / (Benefit) (F+G+H+I)		\$ (18,418,007)	\$ (16,825,930)	\$ (1,592,077)
	BEC 3 & 4 Net Impact (E+J)		\$ (32,066,539)	\$ (28,213,361)	\$ (3,853,178)

*Note: a positive value indicates there was a customer cost for the time period; a negative value indicates a benefit for customers over the time period.

/1 On-Peak: HE 7-22 Monday-Friday

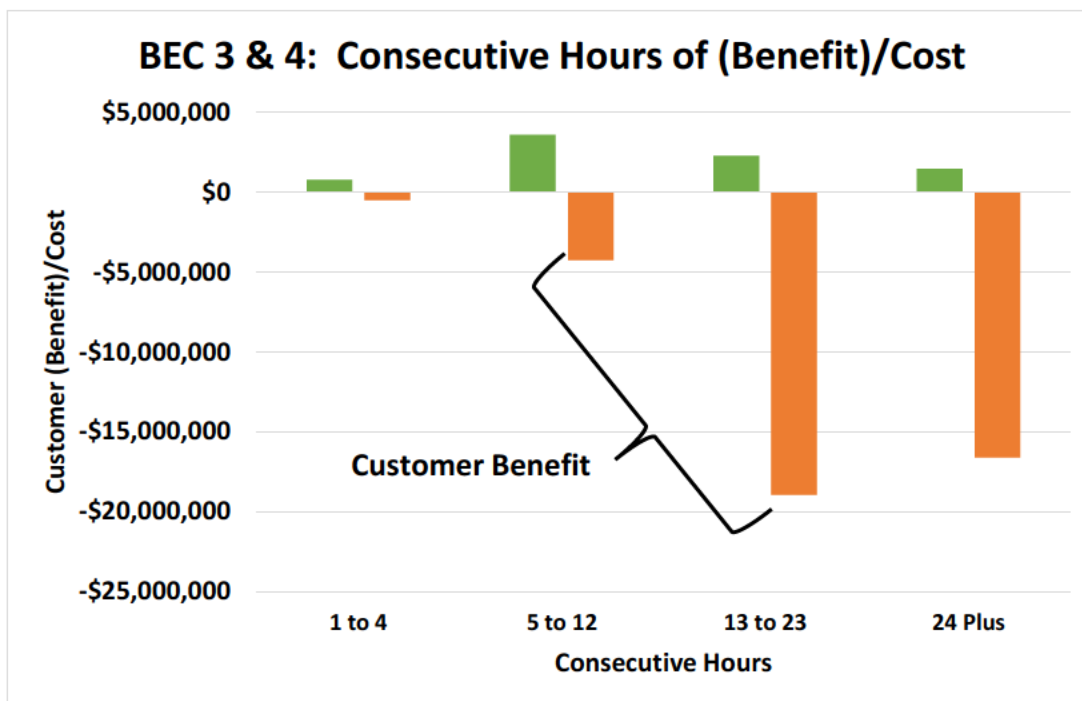
/2 Off-Peak: HE 23-24, 1-6 Monday-Friday and HE 1-24 Saturday-Sunday

As shown in Table 4 above, there are periods where the analysis showed a cost to customers due to the self-commitment process. However, it is important to also consider the profile of these time periods to determine the operational impact. The Company evaluated the data set accompanying this compliance filing to see which consecutive hour segments the costs are occurring. The results of the analysis show that most of the cost incurred during periods of less than 12 consecutive hours, as seen in Figure 1 below.

With the cost occurring in short blocks of time, it would be difficult and not cost effective for the coal units to try to capture these savings by starting-up and shutting down multiple times in a week to try to capture these short time periods. In contrast, the savings customers receive with the units self-committed is greater than the cost incurred during those short periods of time (as shown in Figure 1 below). This demonstrates that given current market conditions, it is more cost effective for customers to back down Boswell units to their minimums than to shut down over these short periods.

Furthermore, if the units operations were changed to shut down more frequently to try to capture these particular time periods, the additional start-up costs (i.e. fuel cost and wear & tear) and operational limitations would need to be considered and the value identified would decrease. The analysis continues to identify that the units are beneficial to be on-line and connected to the grid through the self-commitment process as allowed through the MISO tariff. Minnesota Power will continue to monitor its MISO operational strategies to determine if changes are needed as the system continues to evolve.

Figure 1: Comparison of Boswell Energy Market Costs and Benefits for Continuous Periods



Hourly Data, including the calculations noted above, are included in Attachment 1. Due to the information contained in Attachment 1 it has been Trade Secreted in its entirety.

IV. CONCLUSION

Minnesota Power appreciates the Self-Commitment and Self-Scheduling of Large Baseload Generation Facilities inquiry from the Commission to allow all stakeholders a better understanding of how the utilities operate their baseload generation in the MISO market and the corresponding benefits the customers receive. Having flexible generation within the power supply mix has an important role today and will continue to play an important role in the future for keeping customer costs reasonable and maintaining system reliability.

Minnesota Power leverages a diverse generating fleet to include coal, natural gas, biomass, wind, hydro, and solar resources as well as the MISO energy market and demand response. The Company evaluates its energy market strategy and performance on a regular basis to ensure the assets are providing value to the customers within the MISO market construct. Based on the analysis provided, the

current process and methodology Minnesota Power employs when scheduling and offering the Boswell units into the MISO energy market continue to provide a significant net benefit to customers.

Minnesota Power has demonstrated its commitment and leadership to transforming its generating fleet as the Company will provide its customers 50 percent renewable energy by 2021 with safe and reliable electric service. The Company will continue to consider alternatives such as economic or seasonal dispatch and is evaluating operational conditions and solutions. In a situation where market conditions change and moving to economic or seasonal dispatch is beneficial for customers, while maintaining reliability, the Boswell units and system operators will be ready.

Dated: March 2, 2020

Respectfully Submitted,



Hillary A. Creurer

*Regulatory Compliance Administrator
Minnesota Power
30 W. Superior Street
Duluth, MN 55802
(218) 355-3455
hcreurer@allete.com*

**PUBLIC DOCUMENT
TRADE SECRET DATA EXCISED
IN ITS ENTIRETY**

**STATEMENT REGARDING JUSTIFICATION FOR EXCISING
TRADE SECRET INFORMATION**

Pursuant to the Commission's revised Procedures for Handling Trade Secret and Privileged Date in furtherance of the intent of Minn. Stat. § 13.37 and Minn. Rule 7829.0500, Minnesota Power has designated portions of its attached compliance filing as Trade Secret.

Minnesota Power has excised material from this Self-Commitment and Self-Scheduling of Large Baseload Generation Facilities compliance filing ("Report") because the format of the Report requires Minnesota Power to compile and provide information regarding its operating parameters, power supply, and fuel costs. This is highly confidential information relating to Company financial and planning information; Minnesota Power's competitors and vendors would acquire highly confidential commercial information about Minnesota Power if this information were publicly available. In addition, unauthorized disclosure of this information may violate certain federal securities regulations.

Minnesota Power follows strict internal procedures to maintain the secrecy of this information in order to capitalize on economic value of the information to Minnesota Power on behalf of its customers. Minnesota Power respectfully requests the opportunity to provide additional justification in the event of a challenge to the trade secret designation provided herein.

STATE OF MINNESOTA)
) ss
COUNTY OF ST. LOUIS)

AFFIDAVIT OF SERVICE VIA
ELECTRONIC FILING

Tiana Heger of the City of Duluth, County of St. Louis, State of Minnesota, says that on the 2nd day of March, 2020, she served Minnesota Power's Annual Compliance Filing in **Docket No. E999/CI-19-704** on the Minnesota Public Utilities Commission and the Energy Resources Division via electronic filing. The persons on E-Docket's Official Service List for this Docket were served as requested.



Tiana Heger