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March 2, 2020



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

**PUBLIC DOCUMENT – NOT PUBLIC
(OR PRIVILEGED) DATA HAS BEEN
EXCISED**

**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:

Otter Tail Power Company (Otter Tail) submits this annual compliance filing in the above referenced docket in response to the Minnesota Public Utilities Commission's (Commission) November 13, 2019 Order in Docket No. E-999/AA-18-373 (AAA Order). Specifically, the data presented covers Ordering points 8, 9, and 10. Otter Tail has also provided updated July 2016 to June 2017 data (Fiscal 2017), as well as updated July 2017 to June 2018 (Fiscal 2018) to provide data that is consistent across all reporting periods to date. Otter Tail explains those changes later in this filing.

Not Public Attachment 02 to this filing contains the hourly required information in an Excel file format. *Due to the vast size of this file, paper copies are not provided.*

1. Overview of Analysis

Otter Tail conducted an analysis of two of its three baseload coal units, Big Stone Plant (Big Stone) and Coyote Station¹ (Coyote) for purposes of providing a reasonable quantification of the difference in the cost of running the plant versus corresponding prevailing market prices for energy those units are paid during times when those plants are self-committed or self-scheduled into the market. Due to the upcoming retirement of Otter Tail's Hoot Lake Plant² (Hoot Lake) scheduled for the spring of 2021, Otter Tail has excluded Hoot Lake and the associated analysis from this filing. One of Hoot Lake's two units operates and is self-scheduled into the market only during the winter months to

¹ Big Stone Plant is a 474 MW plant which Otter Tail is a 53.9% owner. Coyote Station is a 427 MW plant which Otter Tail is a 35% owner.

² Hoot Lake Plant is made up of two units totaling 141 MWs which Otter Tail is 100% owner.

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provide heat to the plant. The other unit is offered into the market on an economic basis. There may be times where the unit needs to be self-scheduled for testing purposes. Otherwise, during the rest of the year, the entire plant is dispatched on an economic basis.

For purposes of clarity, Otter Tail provides the following definitions of the terms Self-Commitment and Self-Schedule dispatch:

Definitions:

Self-Commitment dispatch: During a self-commitment, the utility requests the Midwest Independent System Operator (MISO) to commit the unit. The unit is committed to at least the unit's economic minimum output. MISO will commit the unit independent of market pricing assuming such a commitment does not result in a reliability concern. The unit is paid the prevailing Locational Marginal Price (LMP) market price for that unit and is not assured to be made whole to its costs. During self-commitment MISO may dispatch the unit above minimums if market pricing is supportive of such dispatch.

Self-Schedule dispatch: Market Participants may submit self-schedules consisting of fixed quantities of energy, per hour, that may be dispatched from an online unit. If the self-schedule is less than the unit's economic maximum, the unit may be dispatched above the self-schedule on an economic basis. A self-schedule is a price taker up to the self-scheduled amount. Any cleared amount above the self-schedule is eligible to set price. A self-schedule is not a guaranteed dispatch unless the unit is designated as must-run or as a self-commitment. Otter Tail utilizes a self-schedule when units are undergoing testing and require specific generation output levels. It also uses a self-schedule when self-committing resources to ensure the economic minimum is dispatched.

2. Reasons to Self-Commit or Self-Schedule:

Capacity Accreditation Requirements

Seasonal dispatch is not currently viable for Otter Tail Power generating units. In order to meet MISO Module E capacity accreditation requirements, Otter Tail must utilize, and accredit, its large baseload generation facilities. Every generator that is a MISO accredited capacity resource maintains a daily must offer requirement. This offer can be at either a self-commit offer or an economic dispatch offer. This must offer requirement does not allow Otter Tail to de-commit, meaning make the unit unavailable to MISO for dispatch, on a seasonal, or otherwise basis, except for when the unit is on mechanical outage, overhaul, testing, etc. In the event Otter Tail were to forego capacity accreditation of the Big Stone or Coyote generators, Otter Tail would need to procure additional capacity resources to meet the MISO Module E capacity requirements. Additional methods of procuring capacity would include construction of new generation facilities, bi-lateral capacity purchases from other capacity holders, or the purchase of capacity through the annual MISO capacity auction.

Otter Tail utilizes an economic commitment offer for all company generating units except for Big Stone, Coyote, and as mentioned earlier, Hoot Lake during winter months.

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Coyote Station Joint Ownership

Coyote is offered as a “must-run” unit, meaning Otter Tail schedules its share of the unit as self-committed at minimum output. MISO can choose to dispatch the unit higher if market and/or reliability conditions merit additional output. Coyote is a joint owned unit owned by Otter Tail (35 percent), Minnkota Power Cooperative (30 percent), Montana Dakota Utilities (25 percent), and Northwestern Energy (10 percent). Otter Tail, Minnkota Power Cooperative, and Montana Dakota Utilities operate within the MISO market, while Northwestern Energy operates within the SPP market. The SPP and MISO markets do not coordinate the commitment nor the dispatch of jointly owned units. Furthermore, both markets model the shares of a jointly owned unit as individual, separate, and distinct generators. If each partner share of the unit were to be offered as economic, it’s probable that only a portion of the entire unit would be dispatched. Partial dispatch would result in under recovery of startup and make whole payments to the partners whose shares were not dispatched. From a practical standpoint, since the plant is one physical generator, dispatch of a single owner’s share of the plant will result in the dispatch of all owners’ shares of the plant. Furthermore, from a co-owner contractual standpoint, if one owner calls on their share of the plant, all owners are required to take their share’s minimum output. The structure of the Coyote coal contract consists of approximately [PROTECTED DATA BEGINS... ...PROTECTED DATA ENDS] percent fixed costs and [PROTECTED DATA BEGINS... ...PROTECTED DATA ENDS] percent variable costs. As a result of the fixed costs, there are relatively few hours throughout a typical year where it does not make economic sense to operate the plant.

Big Stone Plant Joint Ownership

Similar to Coyote, Big Stone is offered as a “must-run” unit. This means Otter Tail schedules its share of the unit as self-committed at minimum output and MISO can choose to dispatch the unit higher if market and/or reliability conditions merit additional output. Big Stone is a joint owned unit owned by Otter Tail (53.9 percent), Montana Dakota Utilities (22.7 percent), and Northwestern Energy (23.4 percent). Big Stone maintains similar market operating complexities as Coyote. Big Stone straddles both the MISO and SPP wholesale energy markets and can be dispatched by either ISO. Big Stone contractual obligations require partners to take their minimum share of the plant whenever another owner calls for dispatch. Big Stone differs from Coyote in that its coal contract is structured utilizing 100 percent variable costs. The 100 percent variable costs result in a higher percentage of hours where MISO/SPP LMP market pricing is lower than Big Stone variable operating costs. The Big Stone owners are currently investigating the viability and logistics of moving to an economic offer at Big Stone during seasonally low market pricing periods.

Single Day Dispatch by MISO

It should also be noted that MISO utilizes a single day dispatch process. This means that market conditions for a given day, and that day only, would need to justify the economic commitment and dispatch of a unit. This often includes a relatively large startup cost for baseload plants and may artificially increase cycling of the unit. The single day dispatch process does not consider the economics of running a baseload plant across multiple days. MISO is currently working towards incorporating a multi-day dispatch process.

Hoot Lake Plant Excluded from Analysis due to Upcoming Retirement

As noted earlier, Hoot Lake consists of two coal fired units. Unit #2 is approximately 60 MWs and unit #3 is approximately 80 MWs. For much of the year, Hoot Lake is offered into the market on an economic basis. The exception occurs during the winter months when one of the two units is required

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to run for building heat. During this time, approximately November through mid-April, one of the two units is self-committed at minimum output and MISO can dispatch the unit higher if market and/or reliability conditions merit, while the other unit is offered economically.

3. Analysis Approach

Order Point 10 from the Commission's November 13, 2019 Order in Docket No. E-999/AA-18-373 stated the following:

10. 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

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Fiscal 2017 and 2018 Analysis Updated:

For purposes of providing a consistent analysis between the eighteen months of information required in this compliance filing, and the two prior fiscal year's information, Otter Tail provides updated Fiscal 2017 and Fiscal 2018 data in this filing. This updated analysis is provided for Big Stone Plant and Coyote Station. Otter Tail notes the following modifications that have been made to the previously submitted analysis.

Coyote Station Coal Costs:

In Otter Tail's initial analysis for Fiscal years 2017 and 2018, Otter Tail's costs included in the analysis consisted of those costs subject to Fuel Clause Adjustment (FCA) recovery, not necessarily all variable costs. As mentioned earlier, a portion of Otter Tail's coal cost for Coyote is considered a fixed cost, even though all fuel costs are included for recovery in the FCA. In this analysis, Otter Tail only includes the variable portion of the Coyote Coal contract, which is consistent with the costs Otter Tail includes when developing Coyote's offer curve to MISO.

Reagent Costs:

In Otter Tail's initial analysis for Fiscal years 2017 and 2018, Otter Tail's costs did not include reagent costs. Otter Tail's reagent costs are recovered through base rates and not the FCA. Otter Tail has updated the previous analysis to now include reagent expenses since they are considered variable expenses. Variable reagent expenses are included in the offer curve submitted to MISO.

Filing Attachments:

Attachment 1 to this filing provides a summary of the monthly revenues and costs for Big Stone and Coyote for the eighteen months spanning July 2018 to December 2019 for this current filing, and the updated analysis applicable to Fiscal 2017 and Fiscal 2018 analysis.

Attachment 2 to this filing provides the requested hourly data for Big Stone and Coyote for the current reporting period and updated data for the Fiscal 2017 and Fiscal 2018 analysis.

Attachment 3 to this filing provides the fixed monthly O&M costs for Big Stone and Coyote, per Order Point 10 part v.

Attachment 4 to this filing provides plant heat rate information as available from Big Stone and Coyote plants per Order Point 10, parts x and y.

The following outlines Otter Tail's analysis approach and assumptions included in the requested analysis, as well as other factors not included or considered:

1. This analysis compares the market energy revenues received for the time frames the units were self-committed or self-scheduled versus the variable costs included in determining the plant's MISO offer curve for each unit to determine a net difference. The market energy revenues are derived by the Day Ahead (DA) and Real Time (RT) Locational Market Prices (LMP) the units are paid at or above their minimum generation levels. This calculation is completed on a monthly basis for each month in which a unit is self-committed or self-scheduled.
2. Revenues associated with the provision of ancillary services are also included in this analysis.

3. Revenues associated with unit make whole payments are not included in this analysis.
4. The costs of reagents are included in this analysis as they are included as part of Otter Tail's offer curve submitted to MISO. Otter Tail's reagent costs are not part of the FCA, but instead are recovered in base rates.
5. One additional factor that is not quantifiable is what the impact would be on both market prices and the related dispatch of any other Otter Tail generating units if either Big Stone or Coyote Station were only made available on an economic dispatch basis.

4. Analysis Results:

For the 2017 AAA reporting period, the difference between the revenues received during periods of Self Commitment or Self Schedule and fuel costs are reflected in Table 1 below:

Table 1 – Updated FYE 2017 Self Schedule / Self Commit Summary

Line	Plant	Revenue	Fuel Cost	Difference
		[PROTECTED DATA BEGINS...		
1	Big Stone Plant			
2	Coyote Station			
3	Total			
				...PROTECTED DATA ENDS]

For the 2018 AAA reporting period, the difference between the revenues received during periods of Self Commitment or Self Schedule and fuel costs are reflected in Table 2 below:

Table 2 – Updated FYE 2018 Self Schedule / Self Commit Summary

Line	Plant	Revenue	Fuel Cost	Difference
		[PROTECTED DATA BEGINS...		
1	Big Stone Plant			
2	Coyote Station			
3	Total			
				...PROTECTED DATA ENDS]

For the July 2018 through June 2019 AAA reporting period, the difference between the revenues received during periods of self-commitment or self-schedule and fuel costs are reflected in Table 3 below:

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Table 3 – July 2018 through June 2019 Self Schedule / Self Commit Summary

Line	Plant	Revenue	Fuel Cost	Difference
		[PROTECTED DATA BEGINS...		
1	Big Stone Plant			
2	Coyote Station			
4	Total			
				...PROTECTED DATA ENDS]

For the July 2019 through December 2019 AAA reporting period, the difference between the revenues received during periods of self-commitment or self-schedule and fuel costs are reflected in Table 4 below:

Table 4 – July 2019 through December 2019 Self Schedule / Self Commit Summary

Line	Plant	Revenue	Fuel Cost	Difference
		[PROTECTED DATA BEGINS...		
1	Big Stone Plant			
2	Coyote Station			
4	Total			
				...PROTECTED DATA ENDS]

Monthly details for each plant for the three reporting periods are included in Attachment 1.

Order Point 10, part w of the AAA Order requires the Company to provide the capital revenue requirements or reasonable estimates in approximation thereof for all generation units. Otter Tail operates its system as a whole unit and while it is able to approximate a single rate base item, in this case generating units, carving out a single item is a narrow view of the overall impact on the cost of service.

Otter Tail provides Table 5 in compliance with this Order Point utilizing December 2018 FERC Form 1 information which provides the gross plant in service less asset retirement costs [Line 1] per steam plant³. The accumulated depreciation [Line 2] was taken from depreciation records as of December 31, 2018. An estimate of Minnesota Accumulated Deferred Income Taxes [Line 4] was allocated to each steam plant by its weighted average of total 2018 actual plant in service as a percent of production net plant.

³ FERC Form 1, page 402, Total Cost [Line 17] less Asset Retirement Costs [Line 16] by steam plant.

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Table 5 – Rate Base 2018

	A	B	C
Line	Estimate of capital revenue requirements	Coyote	Big Stone
		[PROTECTED DATA BEGINS...	
1	Plant in Service		
2	Accumulated Depreciation		
3	Net Plant in Service		
4	Minnesota Accumulated Deferred Income Tax		
5	Rate Base		
6	Rate of Return Allowed on Rate Base		
7	Estimated Capital Revenue Requirement		
			...PROTECTED DATA ENDS]

5. Conclusion

The following conclusions can be drawn from the analysis conducted:

- a. Market prices which dictate the amount of revenue a unit is paid for its generation can vary the results of this analysis from year to year.
- b. In aggregate, over the eighteen month reporting period, revenues have exceeded the fuel costs attributable to operating these plants during periods of self-schedule and self-commitment.

Various portions and attachments to this filing contain information that Otter Tail considers trade secret. Otter Tail believes this filing comports with the Commission's Notice relating to Revised Procedures for Handling Trade Secret and Privileged Data, pursuant to Minn. R. 7829.0500. As required by the revised procedures, a statement providing the justification for excising the trade secret data follows this letter.

Otter Tail has electronically filed this document with the Commission. In compliance with Minn. R. 7829.1300, subp. 2, Otter Tail is serving a copy of this filing on the Minnesota Department of Commerce- Division of Energy Resources and the Minnesota Office of Attorney General-Antitrust and Utilities Division. A Summary of the filing has been served on all persons on Otter Tail's general service list. A Certificate of Service is also enclosed.

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If you have any questions regarding this filing, please contact me at 218-739-8279 or at stommerdahl@otpc.com.

Sincerely,

/s/ *STUART TOMMERDAHL*

Stuart Tommerdahl

Manager, Regulatory Administration

kaw

Enclosures

By electronic filing

c: Service List

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

Please note that Otter Tail Power Company has marked the following portions of this filing with the caption **NOT PUBLIC DOCUMENT – NOT FOR PUBLIC DISCLOSURE**, according to Minn. Stat. § 13.37, subd. 1(b). This statute protects certain "government data," as that term is defined at Minn. Stat. § 13.02, Subd. 7, from being disclosed by an administrative agency to the public.

- Tables 1, 2, 3, 4 and 5 in the filing letter – Plant specific economic information.
- Attachment 1 in its entirety - Plant specific economic information.
- Attachment 2 in its entirety – Plant specific economic information
- Attachment 3 in its entirety – Plant specific economic information
- Attachment 4 in its entirety – Plant specific operating information

The information being supplied in this filing is considered to be a "compilation" of data that (1) was supplied by Otter Tail Power Company, (2) is the subject of reasonable efforts by Otter Tail Power Company to maintain its secrecy, and (3) derives independent economic value, actual or potential, from not being generally known to or accessible to the public. Otter Tail has contractual obligations to maintain the confidentiality of this information, and this information, if publicly disclosed, could put Otter Tail Power Company at a competitive disadvantage to the detriment of the Company's customers.

It is Otter Tail Power Company's understanding that marking the filing in this manner is consistent with the revised procedures for handling trade secret and privileged data, as announced in the joint memorandum of the Office of Energy Security and Public Utilities Commission dated August 18, 1999 and which became effective September 1, 1999.

Otter Tail Power Company**Analysis of Self Commit/Self Schedule Revenue vs Fuel Cost****Big Stone Plant - OTP Share****Fiscal Year Ending 2017**

Year and Month	Net MISO payment [PROTECTED DATA BEGINS...	Total ASM	Production Costs	Net (Cost) or Benefit
2016 7				
2016 8				
2016 9				
2016 10				
2016 11				
2016 12				
2017 1				
2017 2				
2017 3				
2017 4				
2017 5				
2017 6				
Grand Total				...PROTECTED DATA ENDS]

Fiscal Year Ending 2018

Year and Month	Net MISO payment [PROTECTED DATA BEGINS...	Total ASM	Production Costs	Net (Cost) or Benefit
2017 7				
2017 8				
2017 9				
2017 10				
2017 11				
2017 12				
2018 1				
2018 2				
2018 3				
2018 4				
2018 5				
2018 6				
Grand Total				...PROTECTED DATA ENDS]

Otter Tail Power Company
Analysis of Self Commit/Self Schedule Revenue vs Fuel Cost
Big Stone Plant - OTP Share

Fiscal Year Ending June 2019

Year and Month	Net MISO payment [PROTECTED DATA BEGINS...	Total ASM	Production Costs	Net (Cost) or Benefit
2018 7				
2018 8				
2018 9				
2018 10				
2018 11				
2018 12				
2019 1				
2019 2				
2019 3				
2019 4				
2019 5				
2019 6				
Grand Total				...PROTECTED DATA ENDS]

July 2019 through December 2019

Year and Month	Net MISO payment [PROTECTED DATA BEGINS...	Total ASM	Production Costs	Net (Cost) or Benefit
2019 7				
2019 8				
2019 9				
2019 10				
2019 11				
2019 12				
Grand Total				...PROTECTED DATA ENDS]

Otter Tail Power Company
Analysis of Self Commit/Self Schedule Revenue vs Fuel Cost
Coyote Station - OTP Share

Fiscal Year Ending 2017

Year and Month	Net MISO payment [PROTECTED DATA BEGINS...	Total ASM	Production Costs	Net (Cost) or Benefit
2016 7				
2016 8				
2016 9				
2016 10				
2016 11				
2016 12				
2017 1				
2017 2				
2017 3				
2017 4				
2017 5				
2017 6				
Grand Total				...PROTECTED DATA ENDS]

Fiscal Year Ending 2018

Year and Month	Net MISO payment [PROTECTED DATA BEGINS...	Total ASM	Production Costs	Net (Cost) or Benefit
2017 7				
2017 8				
2017 9				
2017 10				
2017 11				
2017 12				
2018 1				
2018 2				
2018 3				
2018 4				
2018 5				
2018 6				
Grand Total				...PROTECTED DATA ENDS]

Otter Tail Power Company

Analysis of Self Commit/Self Schedule Revenue vs Fuel Cost

Coyote Station - OTP Share

Fiscal Year Ending 2019

Year and Month	Net MISO payment [PROTECTED DATA BEGINS...	Total ASM	Production Costs	Net (Cost) or Benefit
2018 7				
2018 8				
2018 9				
2018 10				
2018 11				
2018 12				
2019 1				
2019 2				
2019 3				
2019 4				
2019 5				
2019 6				
Grand Total				...PROTECTED DATA ENDS]

July 2019 through December 2019

Year and Month	Net MISO payment [PROTECTED DATA BEGINS...	Total ASM	Production Costs	Net (Cost) or Benefit
2019 7				
2019 8				
2019 9				
2019 10				
2019 11				
2019 12				
Grand Total				...PROTECTED DATA ENDS]

¹ During the extended outage at Coyote Station in Q2 2019, Otter Tail continued to incur fixed costs related to its coal supply contract. These costs were applied toward inventory cost and subsequently to production costs in July 2019.

Otter Tail Power Company
Annual Non-Fuel Variable Expenses
(Reagents, Water, Emissions Allowances)

PUBLIC DOCUMENT - NOT PUBLIC (OR PRIVILEGED) DATA HAS BEEN EXCISED
Attachment 3
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		July 2019 - December			
Plant		FYE 2017	FYE 2018	FYE 2019	2019
Big Stone	Protected Data Begins...				
Coyote					
				...Protected Data Ends	

Annual Fixed O&M Expenses

		July 2019 - December			
Plant		FYE 2017	FYE 2018	FYE 2019	2019
Big Stone	Protected Data Begins...				
Coyote					
				...Protected Data Ends	

Otter Tail Power Company

Plant: Big Stone	July 2016 – June 2017	July 2017 – June 2018	July 2018 – June 2019	July 2019 – December 2019
	Protected Data Begins...			
Average Heat Rate at economic maximum				
Plant: Coyote				
Average Heat Rate at economic minimum				
Average Heat Rate at economic maximum				...Protected Data Ends

Plant Heat Rates

CERTIFICATE OF SERVICE

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

I, Kim Ward, hereby certify that I have this day served a copy of the following, or a summary thereof, on Will Seuffert and Sharon Ferguson by e-filing, and Letters of Availability to all other persons on the attached service list by electronic service or by first class mail.

**Otter Tail Power Company
Annual Compliance Filing**

Dated: March 2, 2020

/s/ KIM WARD

Kim Ward

Regulatory Filing Coordinator

Otter Tail Power Company

215 South Cascade Street

Fergus Falls MN 56537

(218) 739-8268

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Christopher	Anderson	canderson@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022191	Electronic Service	No	OFF_SL_19-704_Official
Alison C	Archer	aarcher@misoenergy.org	MISO	2985 Ames Crossing Rd Eagan, MN 55121	Electronic Service	No	OFF_SL_19-704_Official
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_19-704_Official
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_19-704_Official
Bruce	Gerhardson	bgerhardson@otpc.com	Otter Tail Power Company	PO Box 496 215 S Cascade St Fergus Falls, MN 565380496	Electronic Service	No	OFF_SL_19-704_Official
Allen	Gleckner	gleckner@fresh-energy.org	Fresh Energy	408 St. Peter Street Ste 220 Saint Paul, Minnesota 55102	Electronic Service	No	OFF_SL_19-704_Official
Kim	Havey	kim.havey@minneapolismn.gov	City of Minneapolis	350 South 5th Street, Suite 315M Minneapolis, MN 55415	Electronic Service	No	OFF_SL_19-704_Official
Douglas	Larson	dlarson@dakotaelectric.com	Dakota Electric Association	4300 220th St W Farmington, MN 55024	Electronic Service	No	OFF_SL_19-704_Official
Leann	Oehlerking Boes	lboes@mnpower.com	Minnesota Power	30 W Superior St Duluth, MN 55802	Electronic Service	No	OFF_SL_19-704_Official
Randy	Olson	rolson@dakotaelectric.com	Dakota Electric Association	4300 220th Street W. Farmington, MN 55024-9583	Electronic Service	No	OFF_SL_19-704_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Generic Notice	Residential Utilities Division	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_19-704_Official
Isabel	Ricker	ricker@fresh-energy.org	Fresh Energy	408 Saint Peter Street Suite 220 Saint Paul, MN 55102	Electronic Service	No	OFF_SL_19-704_Official
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th PI E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_19-704_Official
Lynnette	Sweet	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_19-704_Official
Stuart	Tommerdahl	stommerdahl@otpc.com	Otter Tail Power Company	215 S Cascade St PO Box 496 Fergus Falls, MN 56537	Electronic Service	No	OFF_SL_19-704_Official
Brian	Tulloh	btulloh@misoenergy.org	MISO	2985 Ames Crossing Rd Eagan, MN 55121-2498	Electronic Service	No	OFF_SL_19-704_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Christopher	Anderson	canderson@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022191	Electronic Service	No	OFF_SL_18-373_AA-18-373
Derek	Bertsch	derek.bertsch@mrenergy.com	Missouri River Energy Services	3724 West Avera Drive PO Box 88920 Sioux Falls, SD 57109-8920	Electronic Service	No	OFF_SL_18-373_AA-18-373
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_18-373_AA-18-373
Marie	Doyle	marie.doyle@centerpointenergy.com	CenterPoint Energy	505 Nicollet Mall P O Box 59038 Minneapolis, MN 554590038	Electronic Service	No	OFF_SL_18-373_AA-18-373
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_18-373_AA-18-373
Bruce	Gerhardson	bgerhardson@otpc.com	Otter Tail Power Company	PO Box 496 215 S Cascade St Fergus Falls, MN 565380496	Electronic Service	No	OFF_SL_18-373_AA-18-373
Douglas	Larson	dlarson@dakotaelectric.com	Dakota Electric Association	4300 220th St W Farmington, MN 55024	Electronic Service	No	OFF_SL_18-373_AA-18-373
Samantha	Norris	samanthanorris@alliantenergy.com	Interstate Power and Light Company	200 1st Street SE PO Box 351 Cedar Rapids, IA 524060351	Electronic Service	No	OFF_SL_18-373_AA-18-373
Leann	Oehlerking Boes	lboes@mnpower.com	Minnesota Power	30 W Superior St Duluth, MN 55802	Electronic Service	No	OFF_SL_18-373_AA-18-373
Randy	Olson	rolson@dakotaelectric.com	Dakota Electric Association	4300 220th Street W. Farmington, MN 55024-9583	Electronic Service	No	OFF_SL_18-373_AA-18-373

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_18-373_AA-18-373
Generic Notice	Residential Utilities Division	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_18-373_AA-18-373
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th PI E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_18-373_AA-18-373
Kristin	Stastny	kstastny@taftlaw.com	Taft Stettinius & Hollister LLP	2200 IDS Center 80 South 8th St Minneapolis, MN 55402	Electronic Service	No	OFF_SL_18-373_AA-18-373
Lynnette	Sweet	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_18-373_AA-18-373
Stuart	Tommerdahl	stommerdahl@otpc.com	Otter Tail Power Company	215 S Cascade St PO Box 496 Fergus Falls, MN 56537	Electronic Service	No	OFF_SL_18-373_AA-18-373
Robyn	Woeste	robynwoeste@alliantenergy.com	Interstate Power and Light Company	200 First St SE Cedar Rapids, IA 52401	Electronic Service	No	OFF_SL_18-373_AA-18-373
Mary	Wolter	mary.wolter@wecenergygroup.com	Minnesota Energy Resources Corporation (HOLDING)	231 West Michigan St Milwaukee, WI 53203	Electronic Service	No	OFF_SL_18-373_AA-18-373