



Minnesota Energy Resources Corporation
2685 145th Street West
Rosemount, MN 55068
www.minnesotaenergyresources.com

September 1, 2020

VIA ELECTRONIC FILING

Will Seuffert
Executive Secretary
Minnesota Public Utilities Commission
121 Seventh Place East, Suite 350
St. Paul, MN 55101

Re: In the Matter of the Petition of Minnesota Energy Resources Corporation for a
Variance and Notice of Refund Plan for Viking Gas Transmission Pipeline
Refund
Docket No. G011/M-20-____

Dear Mr. Seuffert:

Enclosed, please find the Petition of Minnesota Energy Resources Corporation ("MERC" or the "Company") for approval of a variance from Minnesota Rule 7825.2700, subp. 8 and a notice of its refund plan to allow MERC to return a pipeline refund received from Viking Gas Transmission ("VGT") to customers in the MERC-Consolidated purchased gas adjustment ("PGA") area through the monthly PGA in the month of November 2020, or as soon as the Commission approves this variance request.

In accordance with Minnesota Rule 7829.1300, this miscellaneous filing has been served on the Department of Commerce, Division of Energy Resources; the Office of the Attorney General – Residential Utilities Division; and on MERC's general service list.

Please contact me at (414) 221-4208 if you have any questions regarding the information in this filing. Thank you for your attention to this matter.

Sincerely,

A handwritten signature in dark ink that reads "Joylyn C. Hoffman Malueg". The signature is written in a cursive, flowing style.

Joylyn C. Hoffman Malueg
Project Specialist 3

Enclosures
cc: Service List

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

**Katie J. Sieben
Valerie Means
Matthew Schuerger
Joseph K. Sullivan
John A. Tuma**

**Chair
Commissioner
Commissioner
Commissioner
Commissioner**

In the Matter of the Request of Minnesota
Energy Resources Corporation for a Variance
and Notice of Refund Plan for Viking Gas
Transmission Pipeline Refund

Docket No. G011/M-20-____

SUMMARY OF FILING

On September 1, 2020, Minnesota Energy Resources Corporation (“MERC” or the “Company”) submitted to the Minnesota Public Utilities Commission a request for a variance from Minn. R. 7825.2700, subp. 8, and a notice of its refund plan relating to a pipeline refund received from Viking Gas Transmission (“VGT”), in order to allow the Company to refund gas transportation costs issued by VGT as a result of a decision by the Federal Energy Regulatory Commission accepting proposed settlement rates through the Consolidated purchased gas adjustment (“PGA”), rather than through customer bill credits under Minn. R. 7825.2700, subp.8.

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In the Matter of the Request of Minnesota
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Docket No. G011/M-20-____

INTRODUCTION

Pursuant to Minn. R. 7829.3200, Minnesota Energy Resources Corporation (“MERC” or the “Company”) respectfully submits to the Minnesota Public Utilities Commission (the “Commission”) this request for approval of a variance from Minn. R. 7825.2700, subp. 8, and notice of its proposed refund plan relating to a pipeline refund received from Viking Gas Transmission (“VGT”). MERC proposes to refund this amount to ratepayers through the Consolidated System Purchased Gas Adjustment (“CON-PGA”) and therefore requests a variance from the provisions of Minn. R. 7825.2700, subp. 8.

I. Summary of Filing

Pursuant to Minn. R. 7829.1300, subp. 1, a one-paragraph summary of the filing accompanies this petition.

II. Service

Pursuant to Minn. R. 7829.1300, subp. 2, MERC has served a copy of this filing on the Company’s general service list; the Department of Commerce, Division of Energy Resources (the “Department”); and the Office of the Attorney General – Residential Utilities Division (“OAG”).

III. General Filing Information

A. Name, Address, and Telephone Number of Filing Party

Minnesota Energy Resources Corporation
2685 145th Street West
Rosemount, MN 55068
(651) 322-8900

B. Name, Address, Electronic Address, and Telephone Number of Attorney for the Filing Party

Kristin M. Stastny
Taft Stettinius & Hollister LLP
2200 IDS Center
80 South 8th Street
Minneapolis, MN 55402
KStastny@Taftlaw.com
(612) 977-8656

C. Date of the Filing and Date Proposed Change Will Take Effect

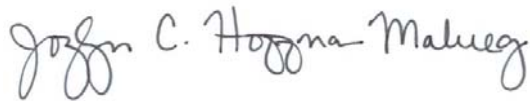
Date of filing: September 1, 2020

Proposed Effective Date: MERC proposes to issue a refund to its customers through the CON-PGA upon receipt of Commission approval of its variance request. MERC requests that the Commission approve the proposed variance request and refund plan in order to allow the Company to include the VGT refund amounts in the PGA in the month of November 2020, or as soon as the Commission approves this variance request.

D. Statute Controlling Schedule for Processing the Filing

Under Minn. R. 7829.0100, subp. 11, this petition is a “miscellaneous” filing because no determination of MERC’s general revenue requirement is necessary. Under Minn. R. 7829.1400, initial comments on a miscellaneous filing are due within 30 days of filing, with reply comments due 10 days thereafter.

E. Signature, Electronic Address, and Title of Utility Employee Responsible for the Filing



Joylyn C. Hoffman Malueg
Project Specialist 3
Joylyn.HoffmanMalueg@wecenergygroup.com
2685 145th Street West
Rosemount, MN 55068
(414) 221-4208

IV. Description and Purpose of Filing

A. Background

VGT filed a rate case with the Federal Energy Regulatory Commission (“FERC”) on June 28, 2019, proposing an increase to its transportation rates. On July 31, 2019, FERC issued an order accepting VGT’s filing, suspending rates, and approving implementation of the proposed increase to rates effective January 1, 2020, subject to refund based on final approved rates. On July 1, 2020, FERC approved a final rate settlement with rates effective as of March 1, 2020, and required refunds for the difference between rates collected from January 1, 2020 through February 29, 2020 and the final approved settlement rates.

As shown in Attachment A, on an invoice dated August 7, 2020, VGT issued a pipeline refund to MERC in the amount of \$28,371.25. VGT included interest in the amount of \$548.58, with the total amount of the refund plus interest being \$28,919.83. This refund was made pursuant to FERC’s Order Approving Uncontested Settlement in Viking Gas Transmission Co., Docket No. RP19-1340-005, issued July 1, 2020.

B. Request for Variance

Minn. R. 7825.2700, subp. 8, provides:

Refunds and interest on refunds, that are received from the suppliers or transporters of purchased gas and attributable to the cost of gas previously sold, must be annually refunded by credits to bills, except that cumulative refund amounts equal to or greater than \$5 per customer must be refunded within 90 days from the

date of refund is received from a supplier or transporter. Refunds must be allocated to customer classes in proportion to previously charged costs of purchased gas. Within classes, the refund amount per unit must be applied to bills on the basis of individual 12-month usage. The utility shall add interest to the unrefunded balance at the prime interest rate.

This rule requires that MERC annually return to customers, via credits on customer bills, refunds (including interest) from gas suppliers or transporters, where the refund is less than \$5 per customer. If the cumulative refund amounts are \$5 per customer or greater, MERC must return to customers, via credits on customer bills, refunds (including interest) within 90 days from the date the refund is received from gas suppliers or transporters. As indicated in Table 2 below, the \$28,919.83 VGT refund is equal to an average of approximately \$0.79 per customer on the MERC CON-PGA. Thus, the one-year refund requirement would apply under Minn. R. 7825.2700. The rule therefore would require that MERC refund on an annual basis (i.e., within 12 months) as a bill credit. MERC seeks a variance from the Commission from the requirements of Minn. R. 7825.2700, subp. 8 in order to issue the VGT refund through the monthly PGA over one month rather than as a separate line item bill credit on customer bills.

Under Minn. R. 7829.3200, the Commission shall grant a variance to its rules when it determines that the following requirements are met: A. enforcement of the rule would impose an excessive burden upon the applicant or others affected by the rule; B. granting the variance would not adversely affect the public interest; and C. granting the variance would not conflict with standards imposed by law. The variance request by MERC meets these three criteria.

1. Enforcement Would Impose an Excessive Burden on MERC

Enforcement of the requirement to issue the refund through a bill credit would be administratively burdensome due to the time and expense associated with such a refund. MERC would need to separately administer the refund by issuing a small bill credit to each customer, and MERC would incur expenses associated with the programming, testing, and

issuance of the refund within MERC's billing system. Additionally, issuing the refund as customer bill credits would require MERC to address inactive customer account refunds. As shown in Table 2 below, the impact of the VGT refund for an average Residential customer is approximately \$0.51 per customer. Not only would individual customer bill credits be administratively difficult, it would result in insignificant bill impacts, and in the majority of cases be subject to rounding errors. MERC's proposal to issue the VGT Total Refund through the CON-PGA would ensure that Consolidated System sales customers at the class level are appropriately refunded, would avoid the confusion and potential for errors associated with the calculation and application of credits to individual accounts, and will allow the refunds to be issued as soon as the Commission approves the requested variance. In light of the time and administrative expense of separate bill credits, MERC believes it will be more efficient to issue the refund through the CON-PGA over a single month.

Table 1. VGT Refund Amount

VGT Refund Amount	VGT Interest	Total VGT Refund
\$28,371.25	\$548.58	\$28,919.83

Table 2. Average Customer Impact

Rate Class	Total VGT Refund	Average MERC-Consolidated Customer Count	Average Impact Per Customer
Residential	\$15,697.26	30,853	\$0.51
Firm Class 1	\$1,438.65	2,195	\$0.66
Firm Class 2 & 3	\$11,783.92	3,527	\$3.34
Total	\$28,919.83	36,575	\$0.79

2. Granting the Variance Would Not Adversely Affect the Public Interest

The public interest would be served by the administrative efficiencies associated with issuing the refund through the CON-PGA. It would not adversely affect the public interest to issue the refund to customers through the CON-PGA because this proposal will ensure that Consolidated System sales customers are appropriately refunded based on the VGT refund amounts and will allow for timely refund to customers. Additionally, MERC would apply interest at the prime rate until the refund is complete.

3. Granting the Variance Would Not Conflict With Standards Imposed by Law

MERC is not aware of any standard imposed by law that would conflict with MERC's implementation of the refund through the CON-PGA. Further, the Commission has granted variances to Minn. R. 7825.2700, subp. 8 in the past, to allow pipeline refunds to be refunded to customers through the monthly PGA and/or annual automatic adjustment.¹

C. Refund Plan

As required by Minn. R. 7825.2700, subp. 8, MERC will apply interest at the prime rate to the balance to be refunded. MERC will continue to apply interest to the balance at the prime rate until the refund is complete.

Minn. R. 7825.2700, subp. 8, requires that pipeline refunds be allocated to customer classes in proportion to previously charged costs of purchased gas, and within classes, the refund amount per unit must be applied to bills on the basis of individual 12-month usage. The

¹ For example, in Docket No. G007,011/M-11-154, MERC requested and was granted identified variance to Minn. R. 7825.2700, subp. 8 to allow the Company to return pipeline refunds to customers through the PGA adjustment rather than as customer bill credits. *In the Matter of a Request by Minnesota Energy Resources Corporation for Approval of a Variance and Notice of Refund Plan*, Docket No. G007,011/M-11-154, ORDER (Aug. 25, 2011). See also Docket No. G004/M-10-63, ORDER (Apr. 30, 2010) (approving a variance to Minn. R. 7825.2700, subp. 8 to allow Great Plains to return Kansas ad valorem tax refund amounts through the Company's Gas Cost Reconciliation adjustment rather than customer bill credits); Docket No. G004/M-08-1027, Order (May 15, 2009) (approving a variance to Minn. R. 7825.2700, subp. 8 to allow Great Plains to return a Northern Natural Gas System Leveling Account refund and Viking Load Management System refund to customers through the Company's Gas Cost Reconciliation Adjustment rather than customer bill credits).

VGT pipeline refund is associated with the VGT demand contracts as shown in Attachment B, which is page 5 of MERC's most recent CON-PGA filing. MERC requests a variance from the requirements of Minn. R. 7825.2700, subp. 8 and proposes to refund applicable customer classes assigned these VGT demand contract costs within the CON-PGA, computing the refund on a per-therm basis utilizing the associated sales volumes approved in MERC's Base Cost of Gas filing in Docket No. G011/MR-17-564² for the month of the refund (e.g. November 2020). This method is consistent with how the VGT rate increase was allocated, which is the basis for the refund.

1. Refund Calculation and Allocation Process

As shown in Table 3 below, MERC started with the VGT Total Refund amount. Using the applicable prime rate, MERC computed interest on the VGT Total Refund amount. Depending on the timing of a Commission decision on MERC's request to refund via the CON-PGA, MERC would continue to compute a refund rate per therm each month on the accumulated balance, as can be seen in Table 3. Using September 2020 as an example, MERC would utilize the accumulative balance to be refunded from August 2020, and apply the prime rate applicable for September 2020 to compute interest. MERC would add that computed interest to the August 2020 accumulative balance of (\$28,981.63) to determine the total refund amount to be credited to the CON-PGA .

To calculate the per-therm credit to be incorporated into the CON-PGA in the month of the refund, MERC proposes to divide the total refund amount by the forecasted demand sales as approved in Docket No. G011/MR-17-564, for the month of the refund. The sales shown in Table 3 are the November monthly forecasted sales from MERC's Base Cost of Gas filing in

² These are also the same forecasted sales volumes approved in MERC's most recent rate case in Docket No. G011/GR-17-563.

Docket No. G011/MR-17-564³ and assumes MERC's proposed implementation date of November 2020.

Upon Commission approval of the proposed refund plan and variance, MERC proposes to incorporate the refund rate per-therm, which is a credit amount, as a line item on Page 5 of the monthly CON-PGA, ensuring the refund and interest at prime rate for the unrefunded period, is refunded to customers through the PGA in the month following Commission approval.

Table 3. Computation of Per Therm Refund Rate

	Total VGT Refund	Prime Rate	Computed Interest	Accumulative Balance to be Refunded	Sales (therms)⁴	Refund Rate (\$/therm)
August 2020	(\$28,919.83)	3.25%	(\$61.80)	(\$28,981.63)	5,148,179	(\$0.00562)
Sept 2020	(\$28,981.63)	TBD	TBD	TBD	5,148,179	TBD

MERC will include the final calculation of the VGT pipeline refund and interest in the monthly CON-PGA filing where the refund is incorporated after the Commission makes a determination on this petition. Finally, to the extent that actual sales differ from forecasted sales for the month of the CON-PGA in which the refund is issued, this amount will be true-up in the Company's annual true-up filing due September 1, 2021.

CONCLUSION

MERC respectfully requests that the Commission approve the Company's request for a variance to issue the VGT refund through its CON-PGA.

³ These are also the same forecasted sales volumes approved in MERC's most recent rate case in Docket No. G011/GR-17-563. Exhibit ____ (MRC-1), Schedule E-1, page 5 of 5, specifically see November sales volumes for Consolidated – Residential, SC&I and LC&I.

⁴ The sales forecast used to calculate the per-therm refund rate will be based on the approved sales in the month the refund is included in the PGA. For this illustration, MERC has used November sales.

DATED: September 1, 2020

Respectfully submitted,

MINNESOTA ENERGY RESOURCES
CORPORATION

By: /s/ Joylyn C. Hoffman Malueg
Joylyn C. Hoffman Malueg
2685 145th Street West
Rosemount, MN 55068
Telephone: (414) 221-4208



TRANSPORTATION INVOICE

Invoice Date:	08/07/2020		Minnesota Energy Resources Corporation	237	
Net Due Date:	08/17/2020		Attn: Kristie Wiegand		
EFT Due Date:	08/17/2020		P.O. Box 19001		
			Green Bay, WI 54307-9001		
Inv Tot Amt:	\$31,593.90				

Line No	Svc Req K	Svc Cd	Location Indicator (Loc Ind)	Rec Loc	Rec Loc Name	Del Loc	Del Loc Name	Beginning Transaction Date (Beg Tran Date)	End Tran Date	Repl Rel Code	Repl Pty ID	Acct Adj Mthd	C a Zone	Chrg Type	Chrg TT	Chrg Ind	Quantity (Dth's)	Unit Price / Chrg Type Rate				Amount Due Curr: USD	
																		Base	ACA	GRI	Total		
0001	AF0012	FT	PRPDXXXX	33973	Emerson	11816	Audubon	07/01/2020	07/31/2020				3	1-1	RD1	01	D	332	\$03.8060	\$0.0000	\$0.0000	\$03.8060	\$1,263.59
0002	AF0012	FT	PRPDXXXX	33973	Emerson	11977	Frazee	07/01/2020	07/31/2020				3	1-1	RD1	01	D	416	\$03.8060	\$0.0000	\$0.0000	\$03.8060	\$1,583.30
0003	AF0012	FT	PRPDXXXX	33973	Emerson	12027	Bertha	07/01/2020	07/31/2020				3	1-1	RD1	01	D	643	\$03.8060	\$0.0000	\$0.0000	\$03.8060	\$2,447.26
0004	AF0012	FT	PRPDXXXX	33973	Emerson	288038	Camp Ripley	07/01/2020	07/31/2020				3	1-1	RD1	01	D	739	\$03.8060	\$0.0000	\$0.0000	\$03.8060	\$2,812.63
0005	AF0012	FT	PRPDXXXX	33973	Emerson	11975	Ada	07/01/2020	07/31/2020				3	1-1	RD1	01	D	1,161	\$03.8060	\$0.0000	\$0.0000	\$03.8060	\$4,418.77
0006	AF0012	FT	PRPDXXXX	33973	Emerson	12028	Staples	07/01/2020	07/31/2020				3	1-1	RD1	01	D	1,756	\$03.8060	\$0.0000	\$0.0000	\$03.8060	\$6,683.34
0007	AF0012	FT	PRPDXXXX	33973	Emerson	11818	Detroit Lakes	07/01/2020	07/31/2020				3	1-1	RD1	01	D	4,008	\$03.8060	\$0.0000	\$0.0000	\$03.8060	\$15,254.45
0008	AF0012	FT	PRPDXXXX	33973	Emerson	11982	Wadena	07/01/2020	07/31/2020				3	1-1	RD1	01	D	6,038	\$03.8060	\$0.0000	\$0.0000	\$03.8060	\$22,980.63
0009	AF0012	FT	PRPDXXXX	33973	Emerson	11982	Wadena	07/01/2020	07/31/2020	RF2328	965177889		3	1-1	RC2	51	D	(2,000)	\$01.4060	\$0.0000	\$0.0000	\$01.4060	(\$2,812.00)
0010	AF0012	FT	PRPDXXXX	33973	Emerson	11818	Detroit Lakes	07/01/2020	07/31/2020	RF2327	965177889		3	1-1	RC2	51	D	(4,000)	\$01.4060	\$0.0000	\$0.0000	\$01.4060	(\$5,624.00)
0011	AF0012	FT	PRPDXXXX	362684	Emerson TP	11982	Wadena	07/01/2020	07/31/2020				3	1-1	COT	01	D	1,000	\$00.0136	\$0.0013	\$0.0000	\$00.0149	\$14.90
0012	AF0012	FT	PRPDXXXX	33973	Emerson	11982	Wadena	07/01/2020	07/31/2020				3	1-1	COT	01	D	22,000	\$00.0136	\$0.0013	\$0.0000	\$00.0149	\$327.80
0013	AF0012	FT	PRPDXXXX					01/01/2020	02/29/2020						MSC	01	D	0					(\$25,868.88)
0014	AF0012	FT	PRPDXXXX					02/19/2020	07/31/2020						OTC	01	D	0					(\$548.58)
0015	Subtotal		PRPDXXXX												COT			23,000					\$22,933.21
0016	AF0321	FT	PRPDXXXX					01/01/2020	02/29/2020						MSC	01	D	0					(\$2,500.82)
0017	Subtotal		PRPDXXXX																				(\$2,500.82)
0018	ML0021	OB	PRPDXXXX					07/01/2020	07/31/2020						RD2	10	D	7,465	\$01.0000	\$0.0000	\$0.0000	\$01.0000	\$7,465.00
0019	ML0021	OB	PRPDXXXX					07/01/2020	07/31/2020						BCO	10	D	1,658	\$01.6503	\$0.0000	\$0.0000	\$01.6503	\$2,736.20
0020	ML0021	OB	PRPDXXXX					07/01/2020	07/31/2020						COT	10	D	1,658	\$00.0136	\$0.0013	\$0.0000	\$00.0149	\$24.71
0021	ML0021	OB	PRPDXXXX					07/01/2020	07/31/2020						COF	10	D	0	\$01.6503	\$0.0000	\$0.0000	\$01.6503	\$0.00
0022	ML0021	OB	PRPDXXXX					07/01/2020	07/31/2020						MC1	10	D	0	\$00.1750	\$0.0000	\$0.0000	\$00.1750	\$0.00
0023	ML0021	OB	PRPDXXXX					07/01/2020	07/31/2020						MC2	10	D	26,774	\$00.0350	\$0.0000	\$0.0000	\$00.0350	\$937.15
0024	ML0021	OB	PRPDXXXX					01/01/2020	02/29/2020						MSC	01	D	0					(\$1.55)
0025	Subtotal		PRPDXXXX												BCO			1,658					\$11,161.51

Invoice Total Amount:

\$31,593.90

MERC - Consolidated

PAGE 5 OF 7

PRESENT AVERAGE COST OF GAS

EFFECTIVE: 1-Sep-20

09/01/20

12:00 AM

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DEMAND							
MERC-Consolidated Firm (GS) Sales as approved in Docket No. G011/MR-17-564							
Contract Type	Season	Monthly Entitlement (Dth)	Months	Rate (\$/Dth)	Contract Costs	Rate Case Sales (therms)	Rate (\$/therm)
Viking (VGT)							
FT-A ZONE 1 - 1	Annual	14,493	12	\$4.37060	\$760,117	48,386,934	\$0.01571
FT-A ZONE 1 - 1	Winter	1,098	3	\$4.37060	\$14,397	48,386,934	\$0.00030
FT-A ZONE 1 - 1	Annual	1,500	3	\$4.37060	\$19,668	48,386,934	\$0.00041
0	0	0	0	\$0.00000	\$0	48,386,934	\$0.00000
VGT Demand					\$794,182	48,386,934	\$0.01641
Great Lakes (GLGT)							
FT Western Zone	Annual	10,130	7	\$2.81000	\$199,257	48,386,934	\$0.00412
FT Western Zone	Annual	12,600	12	\$2.81000	\$424,872	48,386,934	\$0.00878
FT Western Zone (12)	Annual	3,728	5	\$2.81000	\$52,378	48,386,934	\$0.00108
FT Eastern to Western Zone (5)	Winter	15,030	5	\$6.10000	\$458,415	48,386,934	\$0.00947
Storage to Farwell	Winter	15,000	5	\$0.91100	\$68,325	48,386,934	\$0.00141
GLGT Demand					\$1,203,247	48,386,934	\$0.02487
Centra							
CENTRA TRANSMISSION	0	0	0	\$552.61300	\$0	48,386,934	\$0.00000
Conversion ((((\$Cdm103M3)*279.256)/9858	Annual	9,500	12	\$14.10700	\$1,608,198	48,386,934	\$0.03324
CENTRA MINNESOTA PIPELINES	Annual	9,500	12	\$3.29900	\$376,086	48,386,934	\$0.00777
Centra Demand					\$1,984,284	48,386,934	\$0.04101
CURRENT CONSOLIDATED DEMAND - \$/Ccf					\$3,981,713		\$0.08229

In the Matter of the Request of Minnesota
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Transmission Pipeline Refund

Docket No. G011/M-20-____

CERTIFICATE OF SERVICE

I, Colleen T. Sipiorski, hereby certify that on the 1st day of September, 2020, on behalf of Minnesota Energy Resources Corporation ("MERC"), I electronically filed a true and correct copy of the enclosed Petition on www.edockets.state.mn.us. Said documents were also served via U.S. mail and electronic service as designated on the attached service list.

Dated this 1st day of September, 2020.

/s/ Colleen T. Sipiorski
Colleen T. Sipiorski

[illegible]

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Colleen	Sipiorski	Colleen.Sipiorski@wecenergygroup.com	Minnesota Energy Resources Corporation	700 North Adams St Green Bay, WI 54307	Electronic Service	No	GEN_SL_Minnesota Energy Resources Corporation_General Service List
Kristin	Stastny	kstastny@taftlaw.com	Taft Stettinius & Hollister LLP	2200 IDS Center 80 South 8th St Minneapolis, MN 55402	Electronic Service	No	GEN_SL_Minnesota Energy Resources Corporation_General Service List
Eric	Swanson	eswanson@winthrop.com	Winthrop & Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	GEN_SL_Minnesota Energy Resources Corporation_General Service List
Mary	Wolter	mary.wolter@wecenergygroup.com	Minnesota Energy Resources Corporation (HOLDING)	231 West Michigan St Milwaukee, WI 53203	Electronic Service	No	GEN_SL_Minnesota Energy Resources Corporation_General Service List