

215 South Cascade Street
PO Box 496
Fergus Falls, Minnesota 56538-0496
218 739-8200
www.otpc.com (web site)

March 3, 2021



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 Inquiry into Utility Investments that May Assist in Minnesota's
Economic Recovery from the COVID-19 Pandemic
Docket No. EG999/CI-20-492
Supplemental Comments**

Dear Mr. Seuffert:

Otter Tail Power Company (Otter Tail) submits these Supplemental Comments in the above-referenced docket to further refine its request to advance certain projects for purposes of stimulating economic recovery from the COVID-19 Pandemic.

In these Comments, Otter Tail: (1) provides an update on 12 projects originally submitted in the June 17, 2020 report, (2) provides an update on the current status of the three remaining projects left for recovery inclusion in this docket, and (3) creates clarity for appropriate proceedings and associated recovery options available to move these projects forward.

Otter Tail electronically filed this document with the Commission which, in compliance with Minn. Rule 7829.1300, subp. 2, also constitutes service on the Department of Commerce, Division of the Energy Resources and the Office of the Attorney General-Residential Utilities Division. A Certificate of Service is also enclosed.

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

tlk
Enclosures
By electronic filing
c: Service List

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

**In the Matter of an Inquiry into
Utility Investments that May Assist in
Minnesota's Economic Recovery from
the COVID-19 Pandemic**

Docket Nos. EG999/CI-20-492

**OTTER TAIL POWER COMPANY
SUPPLEMENTAL COMMENTS**

I. OVERVIEW

Otter Tail's June 17, 2020 initial filing in this proceeding included 12 ongoing, planned, or possible projects/investments that meet the objectives set forth by the Commission to:

- Provide significant utility system benefits;
- Are consistent with approved resource plans, approved natural gas distribution infrastructure or pipeline safety plans, triennial conservation plans, and existing Commission orders;
- Reduce carbon or other pollutant emissions in the power sector or across economic sectors;
- Increase access to conservation and clean energy resources for Minnesotans;
- Create jobs or otherwise assist in economic recovery for Minnesotans;
- And use woman, veteran, or minority owned businesses as much as possible and provide documentation of these efforts.

In Otter Tail's September 17, 2020 Comments an update was provided on the original 12 projects. Eight of the projects remained in the First Tranche request with three of these projects; Hoot Lake Solar, Acceleration of Streetlight Transition from HID to LED and Increase CIP Rebates for Heat Pumps and POP Solar included in a different method of recovery. The five remaining projects; System Infrastructure and Reliability (SIRI), Telecommunications Projects, Acceleration of Distribution of Transmission Vegetation Management, Ground Line Inspection, and Minnesota (MN) Buildings Maintenance remained as projects with a needed method for recovery.

Since the September 17, 2020 Comments, Otter Tail has further narrowed the projects still needing a method for recovery. This filing requests recovery for three remaining project categories identified below in Table 1, System Infrastructure and Reliability, Acceleration of Distribution and Transmission Vegetation Management, and MN Buildings Maintenance. Table 1 below provides a status update on the 12 original projects and the recovery type requested and/or approved.

Table 1

Line No.						
	A	B	C	D	E	
	Project	Cost Recovery Mechanism (Docket)	Removed from COVID-19 Economic Recover Request Yes or No	Estimated Project Cost - LOW End	Estimated Project Cost - TOP End	Estimated Start Date
1	Hoot Lake Solar	Eligibility Filing E017-M-20-844 Renewable Rider (RRCR)	Yes			
2	System Infrastructure and Reliability (SIRI)	MN Rate Case E017-GR-20-719 Deferred Accounting	No	\$10,000,000	\$15,000,000	Spring 2021
3	Telecommunications Projects	MN Rate Case E017-GR-20-719	Yes			
4	Acceleration of Distribution and Transmission Vegetation Management (VM)	MN Rate Case E017-GR-20-719 Deferred Accounting	No	\$4,520,000	\$4,520,000	Winter 2021
5	Ground Line Inspection	MN Rate Case E017-GR-20-719	Yes			
6	Acceleration of Community Streetlight Transition from HID to LED	MN Rate Case E017-GR-20-719	Yes			
7	Increase CIP Rebates for Heat Pumps and POP Solar	E017-CIP-20-475	Yes			
8	Building Maintenance (Minnesota Buildings Only)	Capital Rider Deferred Accounting Capital Rider	No	\$11,370,000	\$11,370,000	Once approval is received we can begin RFP process for a Spring start
9	Advanced Metering Infrastructure (AMI)	EUIC Rider	Yes			
10	Load Management System Replacement	EUIC Rider	Yes			
11	Advanced Distribution Management (Outage Management System)	EUIC Rider	Yes			
12	Electric Vehicle Infrastructure and Rate Pilot, Docket E017/M-20-181-APPROVED	E017-M-20-181 Approved	Yes			

II. UPDATE ON PROJECTS

A. Status of projects no longer needing action in this Docket

Otter Tail originally submitted 12 projects in the June 17, 2020 Initial Filing.

Subsequently, Otter Tail has reviewed and filed for recovery of nine of these projects through different riders and/or the most recent MN Rate Case. Listed below is an update on the nine projects that have either been approved or requested in a different recovery method.

- 1. Hoot Lake Solar** – Otter Tail filed an eligibility filing on November 25, 2020, Docket E017/M-20-844. Otter Tail Power requested the Minnesota Public Utilities Commission (Commission) determine the 49.9 megawatt (MW) Hoot Lake Solar Project to be constructed at the site of the existing Hoot Lake power plant qualifies for application toward Otter Tail's solar energy standard (SES)

obligations. Otter Tail further requests the Commission authorize, as described herein, 100 percent of the output of the project to be allocated for use by Minnesota Customers and 100 percent of Otter Tail's investment in the project eligible for future cost recovery from Minnesota customers through Otter Tail's Renewable Resource Cost Recovery (RRCR) rider.

Recovery Mechanism: Assuming favorable eligibility determination, actual costs to be recovered will be presented by Otter Tail in a future RRCR rider petition.

- 2. Telecommunications Projects** – To facilitate the gathering of data necessary to operate its electrical system, Otter Tail utilizes leased communications lines and a microwave communication system which is reaching its end of life and technological obsolescence. Otter Tail has therefore identified a need to install fiber optic communication to replace its existing systems. The telecommunications strategy is to build fiber infrastructure for the use of current communications (network connectivity) and meet future connectivity requirements for all Otter Tail business units. This includes connectivity to customer service centers, plants, and transmission substations and includes the future buildout to warehouse locations, meter collector sites, and distribution substations. The connectivity is for applications such as the energy management system, industrial control network systems, security control applications and enterprise voice and data applications. In the near term, Otter Tail has identified two specific projects in the Alexandria and Canby, Minnesota areas to install fiber optic communications routes that would replace currently leased lines as well as the microwave system in those areas.

Recovery Mechanism: Included as part of MN Rate Case, Docket E017/GR-20-719, filed on November 2, 2020.

- 3. Ground Line Inspection** – This project consists of performing groundline inspection on 41.6 kV transmission poles. Contracted vendors inspect the health of poles, which includes inspecting for damage or rot and documenting their findings.

Recovery Mechanism: Included as part of MN Rate Case, Docket E017/GR-20-719, filed on November 2, 2020.

- 4. Acceleration of Community Streetlight Transition from HID to LED** – The LED conversion project was originally filed and approved by the MPUC and approved by the Department of Commerce in Otter Tail’s 2017-2020 Conservation Improvement Program (CIP) Triennial plan in Docket No. E017-CIP-116-16, to be a five-year project including years 2018, 2019, 2020, 2021, and 2022. The project consists of Otter Tail converting all 20,000+ Company-owned street and area lights in Minnesota to LED technology. Otter Tail believes an opportunity exists to accelerate the project in 2021 to complete the project one year earlier. This will save energy purchases, reduce maintenance expense on existing lighting, and provide more aesthetic lighting for customers.

Recovery Mechanism: Included as part of MN Rate Case, Docket E017/GR-20-719, filed on November 2, 2020.

- 5. Increase CIP Rebates for Heat Pumps and POP Solar** - Currently Otter Tail has programs for electric Heat Pumps and a Publicly-Owned Property (POP) Solar program included in its 2020 CIP plan. Otter Tail is considering increasing the customer rebates to spur further program participation by its Minnesota customers. Otter Tail believes an increase in customer rebates to these programs will enable more customers to install these systems and realize the benefits they provide in cost savings and energy savings or production.

Recovery Mechanism: Approved in Docket E017/CIP-20-475 on November 24, 2020.

- 6. Advanced Metering Infrastructure (AMI)** – The AMI planned project is made up of several components. Advanced meters will be installed at nearly every service location. Collectors will be placed in local areas to receive the data from the meters and transmit it to a head-end system where the data will be stored and made available to certain other Otter Tail systems, such as a meter data management system (MDM), the customer information system, and an outage management system. AMI will enhance customers' experience by providing real time information and customer options. Upon completion of the project, customers will be able to receive outage notifications and have access to hourly usage data which would assist them with conservation efforts. Meter reading and service changes would be handled remotely, decreasing costs and risks that come with onsite work.
- 7. Load Management System (LMS) Replacement** – Otter Tail's current load management system is nearing its end of life. The load management system is what is used to control load at a customer's location as required for subscription to demand response rates and programs. Current Remote Transmit Controllers (RTCs) are no longer sold or supported by the manufacturer. Even if the equipment were available, significant investment would need to be made to keep the system running in its current state. The AMI project, currently being developed at Otter Tail Power and described above, provides potential to upgrade and greatly expand the current program offering. This upgrade could include adding new receivers, switches, software, and programming logic. By upgrading the system, Otter Tail will have the ability to offer additional rates to its current nine rates that utilize the current load management system.
- 8. Advanced Distribution Management System (ADMS)** – Otter Tail's planned ADMS platform offers many modules to modernize our grid and operations, including an Outage Management System (OMS) module. An OMS will allow Otter Tail to better manage outages, which will reduce total interruption minutes to customers, and it will allow Otter Tail to better communicate with customers during outage events, such as notifying them of the estimated time of

restoration, etc. The ADMS also has other modules that Otter Tail plans to pursue in some future timeframe, such as volt-var optimization, load management controls, and automated system reconfiguration.

Recovery Mechanism: Otter Tail is currently developing an eligibility filing in an Electric Utility Infrastructure Costs (EUIC) Rider which will include AMI, LMS Replacement and ADMS (Outage Management). The eligibility filing for the EUIC Rider is scheduled for early March 2021.

- 9. Electric Vehicle Infrastructure and Rate Pilot** – On January 31, 2020, Otter Tail filed with the Minnesota Public Utilities Commission a pilot project to build, own and operate 11 direct current fast charging (DCFC) EV sites in its Minnesota service territory. In addition to the 11 DCFC sites, Otter Tail proposed to add an additional 10 Level 2 EV charging sites. Currently Otter Tail only serves one DCFC location in its Minnesota service territory which was developed by Otter Tail. Otter Tail’s plan will expand DCFC sites to all areas of its Minnesota service area so 100 percent of customers are within 60 miles of a DCFC. Otter Tail’s plan will prevent range anxiety from prospective EV ownership ensuring EV owners that fast charging options are available throughout Otter Tail’s rural territory. The plan should increase EV ownership among customers and encourage more EV owners to travel throughout the service area.

Recovery Mechanism: Approved in Docket E017/M-20-181, August 27, 2020.

B. *Status of projects needing action in this Docket*

For the remaining three projects identified in Table 2, Otter Tail is requesting approval of deferred accounting as a mechanism for recovery in this Docket. Otter Tail believes that the Commission’s timely approval of these projects with the proposed recovery approach, as described below, will mitigate rate impacts. By authorizing deferred accounting for the annual revenue requirements until the projects are included in a rate case following their in-service dates, there will be no immediate rate impact. Future rate impacts will be the then current annual revenue requirements of the projects in the test year of a future rate case and a portion of the

deferred balance existing at that time. The annual amount of the deferral to be included in the test year will depend on the amortization proposed for recovery for the balance of the deferred amount. By using this approach, there is no current impact and future rate impacts can be moderated in the rate case as circumstances dictate at that time.

- 1. System Infrastructure and Reliability (SIRI)** – The bulk of the SIRI projects represent replacement of aged transmission and distribution (T&D) facilities across Otter Tail’s service territory. Otter Tail has identified a need to increase the rate of replacements, as its current replacement programs are not adequate to keep pace with the high rate of upcoming asset retirement. This includes transmission line replacement projects, cutout failure replacement programs, increased underground replacement programs, distribution substation replacement programs, and distribution line replacement programs. The ideal average age of transmission poles is around half of the expected 70-year life of a pole or about 35 years. With Otter Tail’s current average spend, the Company would be setting a replacement pace that has a calculated expected life of transmission poles of around 110 years. This is nearly 60 percent longer than the high end of average expected pole age. Historically, this has not been of concern due to the vintage of the assets in the field; however, a larger influx of asset is approaching average end of life. Statistically, the current average age of the transmission pole fleet is 45 years old and has been growing around half of a year per year. The proposed projects will reverse the trend of increasing average age of poles. The SIRI projects are a mix of both ongoing and planned projects. Otter Tail has a significant amount of information and analysis supporting the identified need and benefits of increasing the rate of replacement. Current rates of replacement are constrained by cost recovery approaches that assume spending will correspond generally with historic annual depreciation expense (if routine annual depreciation expense is exceeded, it generally causes under-recovery) The range in estimates of SIRI are amounts above historical replacement spending to replace aging infrastructure. The amounts also represent numerous smaller T&D construction projects therefore a start and end date are more continual than infinite. Otter Tail utilizes contractors when the

internal labor force is not available to complete projects, which will be the case in 2021. Timing is of a concern in order to secure and onboard contractors. Timely approval of an increased 2021 budget is needed to secure additional labor forces. The bulk of the SIRI projects represent replacement of aged T&D facilities across Otter Tail's service territory. We have identified a need to increase the rate of replacements, as our current replacement programs are not adequate to keep pace with the high rate of upcoming asset retirement. As noted earlier, this includes transmission line replacement projects, cutout failure replacement programs, increased underground replacement programs, distribution substation replacement programs, and distribution line replacement programs.

2. Acceleration of Distribution and Transmission Vegetation Management

(VM) - Otter Tail vegetation management contractors would be secured to perform vegetation management on Otter Tail's distribution feeders and transmission systems. This activity can also include sterilization of substations for vegetation including noxious weeds in distribution and transmission substations. All work to be completed is ongoing and planned, and Otter Tail generally sets routine annual budget amounts. These budget amounts can be temporarily modified/increased when economic conditions require (e.g., to adjust for changes in utility revenues). By assuring adequate recovery, of spending exceeding current budgeted amounts, Otter Tail can accelerate vegetation management work beyond typical annual projections and enhance reliability. If approved, Otter Tail can communicate with contractors and assure them its needs for 2021 which will allow them to confidently hire and employ more staff to meet that need.

3. Minnesota (MN) Buildings Maintenance - Otter Tail has 65 buildings throughout its service territory. Many of the buildings are used by field personnel for purposes of responding to customers spread out widely due to Otter Tail's large sparsely populated service territory. Many of Otter Tail's dispersed buildings need repair or replacement as they do not provide a

reasonable workspace for employees to use as outposts for their work and storage for their equipment and tools. Fifty-seven percent of Otter Tail's buildings are over 50 years old. Today's vehicles, pickups, bucket trucks, digger derricks, etc., are much larger than they were 50- 60 years ago and in many cases no longer able to fit in the Company's buildings. Some of these vehicles cost up to \$350k and would be better preserved if stored out of the elements. Inside storage would also improve response times to power outages in severe weather, preventing the need for clearing snow and ice from the windshield or loading materials in the pouring rain. In addition to increasing the size for newer larger trucks, repairs are needed to keep out the elements at these remote buildings, such as new doors, windows, roofs, rusted and damaged siding, etc. Other repairs are for worn furnishings like flooring, ceilings, paint, etc. In some cases, it may be more cost effective to replace rather than repair. With needing extra room to fit the vehicles into the building and the needed repairs, Otter Tail has flagged one-third of its buildings as needing to be replaced. The following list summarizes several of these projects:

1. Replacement of 10 MN area service buildings. \$8M
2. Replacement of 5 area service building and CSC roofs- \$380k (4 additional roofs if buildings are not replaced within 5-10 years. Additional \$240k)
3. Storage racks/ pole bunks \$200k
4. New siding for area service buildings- \$300k
5. New lighting for area service buildings \$80k
6. Area service building overhead and walk-through doors- \$60k
7. Pole yard fencing- \$100k
8. Area service building interior (flooring, ceilings, bathrooms, paint, etc.) \$150k
9. Fergus Falls office building improvements (flooring, fire and sprinkler systems, HVAC, parking lots, lighting) \$2M (Most of the building maintenance items are planned and/or potential dependent upon funding. Otter Tail expects that with approval the RFP process can begin with repairs and replacements starting as soon as Spring 2021.)

C. Project Summary

Table 2 below summarizes the three projects discussed above which could be advanced to help stimulate local economic recovery and at the same time meeting critical needs for Otter Tail Power.

Table 2

Line No.	A	B	C	D	E
	Project	Cost Recovery Mechanism	Estimated Project Cost - LOW End	Estimated Project Cost - TOP End	Estimated Start Date
1	System Infrastructure and Reliability (SIRI)	MN Rate Case E017-GR-20-719 Deferred Accounting	\$10,000,000	\$15,000,000	Spring 2021
2	Acceleration of Distribution and Transmission Vegetation Management (VM)	MN Rate Case E017-GR-20-719 Deferred Accounting	\$4,520,000	\$4,520,000	Winter 2021
3	Building Maintenance (Minnesota Buildings Only)	MN Rate Case E017-GR-20-719 Deferred Accounting	\$11,370,000	\$11,370,000	Once approval is received we can begin RFP process for a Spring start

D. Separate Docket Alternative

As this current Docket has sought input from all Minnesota electric and gas utilities with regard to potential projects the respective companies considered advancing projects, with subsequent rounds of comments being more targeted at other specific utility requests. Otter Tail is fine with continuing to move our projects forward within this Docket. However, should the Commission find it administratively more efficient or desirable to move Otter Tail's request to a new Docket, Otter Tail would be supportive of that alternative as well.

III. CONCLUSION

Otter Tail has narrowed its request for seeking recovery of accelerated capital and O&M spending to three categories as discussed above. These projects are easily accelerated subject to contractor and material availability, and clearly address critical needs in Otter Tail's ability to continue providing reliable service to its customers by replacing or updating key aging infrastructure. These projects will also provide near term economic impacts to the areas we serve. The Company thanks the Commission for considering its request and respectfully seeks Commission support in helping Otter Tail move forward with these projects.

Dated: March 3, 2021

Respectfully submitted,

OTTER TAIL POWER COMPANY

By: /s/ STUART TOMMERDAHL

Stuart Tommerdahl

Manager, Regulatory Administration

Otter Tail Power Company

215 South Cascade

P.O. Box 496

Fergus Falls, MN 56538-0496

(218) 739-8279

stommerdahl@otpc.com

CERTIFICATE OF SERVICE

**RE: In the Matter of an Inquiry into Utility Investments that May Assist in Minnesota's
Economic Recovery from the COVID-19 Pandemic
Docket No. EG999/CI-20-492**

I, Tammy Kubela, 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 to all other persons on the attached service list by electronic service or by First Class Mail.

**Otter Tail Power Company
Supplemental Comments**

Dated: March 3, 2021

/s/ Tammy Kubela
Tammy Kubela
Regulatory Filing Coordinator
Otter Tail Power Company
215 South Cascade Street
Fergus Falls MN 56537
(218) 739-8807

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_20-492_Official
Michael	Ahern	ahern.michael@dorsey.com	Dorsey & Whitney, LLP	50 S 6th St Ste 1500 Minneapolis, MN 554021498	Electronic Service	No	OFF_SL_20-492_Official
Kristine	Anderson	kanderson@greatermngas.com	Greater Minnesota Gas, Inc.& Greater MN Transmission, LLC	1900 Cardinal Lane PO Box 798 Faribault, MN 55021	Electronic Service	No	OFF_SL_20-492_Official
Alison C	Archer	aarcher@misoenergy.org	MISO	2985 Ames Crossing Rd Eagan, MN 55121	Electronic Service	No	OFF_SL_20-492_Official
James J.	Bertrand	james.bertrand@stinson.com	STINSON LLP	50 S 6th St Ste 2600 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-492_Official
Laura	Bishop	Laura.Bishop@state.mn.us	MN Pollution Control Agency	520 Lafayette Rd Saint Paul, MN 55155	Electronic Service	No	OFF_SL_20-492_Official
Brenda A.	Bjorklund	brenda.bjorklund@centerpointenergy.com	CenterPoint Energy	505 Nicollet Mall Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-492_Official
Michael J.	Bull	mbull@mncee.org	Center for Energy and Environment	212 Third Ave N Ste 560 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_20-492_Official
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	No	OFF_SL_20-492_Official
Gabriel	Chan	gabechan@umn.edu	University of Minnesota	130 Hubert H. Humphrey Center 301 19th Ave S Minneapolis, Minnesota 55455	Electronic Service	No	OFF_SL_20-492_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Cody	Chilson	cchilson@greatermngas.com	Greater Minnesota Gas, Inc. & Greater MN Transmission, LLC	1900 Cardinal Ln PO Box 798 Faribault, MN 55021	Electronic Service	No	OFF_SL_20-492_Official
Ray	Choquette	rchoquette@agp.com	Ag Processing Inc.	12700 West Dodge Road PO Box 2047 Omaha, NE 68103-2047	Electronic Service	No	OFF_SL_20-492_Official
John	Coffman	john@johncoffman.net	AARP	871 Tuxedo Blvd. St, Louis, MO 63119-2044	Electronic Service	No	OFF_SL_20-492_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_20-492_Official
Riley	Conlin	riley.conlin@stoel.com	Stoel Rives LLP	33 S. 6th Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-492_Official
Brooke	Cooper	bcooper@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022191	Electronic Service	No	OFF_SL_20-492_Official
Hillary	Creurer	hcreurer@allete.com	Minnesota Power	30 W Superior St Duluth, MN 55802	Electronic Service	No	OFF_SL_20-492_Official
George	Crocker	gwillc@nawo.org	North American Water Office	PO Box 174 Lake Elmo, MN 55042	Electronic Service	No	OFF_SL_20-492_Official
David	Dahlberg	davedahlberg@nweco.com	Northwestern Wisconsin Electric Company	P.O. Box 9 104 South Pine Street Grantsburg, WI 548400009	Electronic Service	No	OFF_SL_20-492_Official
Carrie	Desmond	carrie.desmond@metrotransit.org	Metropolitan Council	560 6th Avenue North Minneapolis, MN 55411	Electronic Service	No	OFF_SL_20-492_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Bridget	Dockter	Bridget.Dockter@xcelenergy.com		N/A	Electronic Service	No	OFF_SL_20-492_Official
Marie	Doyle	marie.doyle@centerpointenergy.com	CenterPoint Energy	505 Nicollet Mall P O Box 59038 Minneapolis, MN 554590038	Electronic Service	No	OFF_SL_20-492_Official
Michelle	Dreier	mdreier@electricalassociation.com		N/A	Electronic Service	No	OFF_SL_20-492_Official
Ron	Elwood	relwood@mnlisap.org	Mid-Minnesota Legal Aid	2324 University Ave Ste 101 Saint Paul, MN 55114	Electronic Service	No	OFF_SL_20-492_Official
Betsy	Engelking	betsy@geronimoenergy.com	Geronimo Energy, LLC	8400 Normandale Lake Blvd Suite 1200 Bloomington, MN 55437	Electronic Service	No	OFF_SL_20-492_Official
James C.	Erickson	jerricksonkbc@gmail.com	Kelly Bay Consulting	17 Quechee St Superior, WI 54880-4421	Electronic Service	No	OFF_SL_20-492_Official
John	Farrell	jfarrell@ilsr.org	Institute for Local Self-Reliance	2720 E. 22nd St Institute for Local Self-Reliance Minneapolis, MN 55406	Electronic Service	No	OFF_SL_20-492_Official
Eric	Fehlhaber	efehlhaber@dakotaelectric.com	Dakota Electric Association	4300 220th St W Farmington, MN 55024	Electronic Service	No	OFF_SL_20-492_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_20-492_Official
Lucas	Franco	lfranco@liunagroc.com	LIUNA	81 Little Canada Rd E Little Canada, MN 55117	Electronic Service	No	OFF_SL_20-492_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Daryll	Fuentes	dfuentes@usg.com	USG Corporation	550 W Adams St Chicago, IL 60661	Electronic Service	No	OFF_SL_20-492_Official
Brian	Gardow	bgardow@greatermngas.com	Greater Minnesota Gas, Inc. & Greater MN Transmission, LLC	1900 Cardinal Ln PO Box 798 Faribault, MN 55021	Electronic Service	No	OFF_SL_20-492_Official
James	Garness	james.r.garness@xcelenergy.com		N/A	Electronic Service	No	OFF_SL_20-492_Official
Edward	Garvey	edward.garvey@AESLconsulting.com	AESL Consulting	32 Lawton St Saint Paul, MN 55102-2617	Electronic Service	No	OFF_SL_20-492_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_20-492_Official
Anita	Grace	anita@gracemulticultural.com	GRACE Multicultural	12959 196th LN NW Elk River, MN 55330	Electronic Service	No	OFF_SL_20-492_Official
Bill	Grant	billgrant@minncap.org	Minnesota Community Action Partnership	MCIT Building 100 Empire Dr Ste 202 St. Paul, MN 55103	Electronic Service	No	OFF_SL_20-492_Official
Todd J.	Guerrero	todd.guerrero@kutakrock.com	Kutak Rock LLP	Suite 1750 220 South Sixth Street Minneapolis, MN 554021425	Electronic Service	No	OFF_SL_20-492_Official
Annete	Henkel	mui@mutilityinvestors.org	Minnesota Utility Investors	413 Wacouta Street #230 St. Paul, MN 55101	Electronic Service	No	OFF_SL_20-492_Official
Shane	Henriksen	shane.henriksen@enbridge.com	Enbridge Energy Company, Inc.	1409 Hammond Ave FL 2 Superior, WI 54880	Electronic Service	No	OFF_SL_20-492_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Corey	Hintz	chintz@dakotaelectric.com	Dakota Electric Association	4300 220th Street Farmington, MN 550249583	Electronic Service	No	OFF_SL_20-492_Official
Michael	Hoppe	lu23@ibew23.org	Local Union 23, I.B.E.W.	445 Etna Street Ste. 61 St. Paul, MN 55106	Electronic Service	No	OFF_SL_20-492_Official
MJ	Horner	mj.horner@xcelenergy.com		N/A	Electronic Service	No	OFF_SL_20-492_Official
Lori	Hoyum	lhoyum@mnpower.com	Minnesota Power	30 West Superior Street Duluth, MN 55802	Electronic Service	No	OFF_SL_20-492_Official
Travis	Jacobson	travis.jacobson@mdu.com	Great Plains Natural Gas Company	400 N 4th St Bismarck, ND 58501	Electronic Service	No	OFF_SL_20-492_Official
Alan	Jenkins	aj@jenkinsatlaw.com	Jenkins at Law	2950 Yellowtail Ave. Marathon, FL 33050	Electronic Service	No	OFF_SL_20-492_Official
Richard	Johnson	Rick.Johnson@lawmoss.com	Moss & Barnett	150 S. 5th Street Suite 1200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-492_Official
Sarah	Johnson Phillips	sarah.phillips@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-492_Official
Stacey	Karels	skarels@local563.org	Mankato Area Bldg & Construction Trades Council	310 McKinzie St Mankato, MN 56001	Electronic Service	No	OFF_SL_20-492_Official
Mark J.	Kaufman	mkaufman@ibewlocal949.org	IBEW Local Union 949	12908 Nicollet Avenue South Burnsville, MN 55337	Electronic Service	No	OFF_SL_20-492_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Thomas	Koehler	TGK@IBEW160.org	Local Union #160, IBEW	2909 Anthony Ln St Anthony Village, MN 55418-3238	Electronic Service	No	OFF_SL_20-492_Official
Michael	Krikava	mkrikava@taftlaw.com	Taft Stettinius & Hollister LLP	2200 IDS Center 80 S 8th St Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-492_Official
Nicolle	Kupser	nkupser@greatermngas.com	Greater Minnesota Gas, Inc. & Greater MN Transmission, LLC	1900 Cardinal Ln PO Box 798 Faribault, MN 55021	Electronic Service	No	OFF_SL_20-492_Official
Douglas	Larson	dlarson@dakotaelectric.com	Dakota Electric Association	4300 220th St W Farmington, MN 55024	Electronic Service	No	OFF_SL_20-492_Official
James D.	Larson	james.larson@avantenergy.com	Avant Energy Services	220 S 6th St Ste 1300 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-492_Official
Peder	Larson	plarson@larkinhoffman.com	Larkin Hoffman Daly & Lindgren, Ltd.	8300 Norman Center Drive Suite 1000 Bloomington, MN 55437	Electronic Service	No	OFF_SL_20-492_Official
Amber	Lee	Amber.Lee@centerpointenergy.com	CenterPoint Energy	505 Nicollet Mall Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-492_Official
Kevin	Lee	klee@bluegreenalliance.org	BlueGreen Alliance	2701 University Ave SE Ste. 209 Minneapolis, MN 55414	Electronic Service	No	OFF_SL_20-492_Official
Annie	Levenson Falk	annief@cupminnesota.org	Citizens Utility Board of Minnesota	332 Minnesota Street, Suite W1360 St. Paul, MN 55101	Electronic Service	No	OFF_SL_20-492_Official
Ryan	Long	ryan.j.long@xcelenergy.com	Xcel Energy	414 Nicollet Mall 401 8th Floor Minneapolis, MN 55401	Electronic Service	No	OFF_SL_20-492_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Susan	Ludwig	sludwig@mnpower.com	Minnesota Power	30 West Superior Street Duluth, MN 55802	Electronic Service	No	OFF_SL_20-492_Official
Kavita	Maini	kmairi@wi.rr.com	KM Energy Consulting, LLC	961 N Lost Woods Rd Oconomowoc, WI 53066	Electronic Service	No	OFF_SL_20-492_Official
Pam	Marshall	pam@energycents.org	Energy CENTS Coalition	823 7th St E St. Paul, MN 55106	Electronic Service	No	OFF_SL_20-492_Official
Brian	Meloy	brian.meloy@stinson.com	STINSON LLP	50 S 6th St Ste 2600 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-492_Official
Peder	Mewis	pmewis@cleangridalliance.org	Clean Grid Alliance	570 Asbury St. St. Paul, MN 55104	Electronic Service	No	OFF_SL_20-492_Official
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_20-492_Official
Stacy	Miller	stacy.miller@minneapolismn.gov	City of Minneapolis	350 S. 5th Street Room M 301 Minneapolis, MN 55415	Electronic Service	No	OFF_SL_20-492_Official
David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022093	Electronic Service	No	OFF_SL_20-492_Official
Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP	33 South Sixth St Ste 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-492_Official
David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency	220 South Sixth Street Suite 1300 Minneapolis, Minnesota 55402	Electronic Service	No	OFF_SL_20-492_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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_20-492_Official
Nate	O'Reilly	nate@iron512.com	Ironworkers Local #512	851 Pierce Butler Route St Paul, MN 55104	Electronic Service	No	OFF_SL_20-492_Official
Matthew	Olsen	molsen@otpc.com	Otter Tail Power Company	215 South Cascade Street Fergus Falls, MN 56537	Electronic Service	No	OFF_SL_20-492_Official
Carol A.	Overland	overland@legalelectric.org	Legalelectric - Overland Law Office	1110 West Avenue Red Wing, MN 55066	Electronic Service	No	OFF_SL_20-492_Official
John	Pacheco	johnpachecojr@gmail.com		N/A	Electronic Service	No	OFF_SL_20-492_Official
Greg	Palmer	gpalmer@greatermngas.com	Greater Minnesota Gas, Inc. & Greater MN Transmission, LLC	1900 Cardinal Ln PO Box 798 Faribault, MN 55021	Electronic Service	No	OFF_SL_20-492_Official
Ben	Passer	Passer@fresh-energy.org	Fresh Energy	408 St. Peter Street Ste 220 Saint Paul, MN 55102	Electronic Service	No	OFF_SL_20-492_Official
Jose	Perez	jose@hispanicsinenergy.com		1017 L Street #719 Sacramento, CA 95814	Electronic Service	No	OFF_SL_20-492_Official
Jennifer	Peterson	jppeterson@mnpower.com	Minnesota Power	30 West Superior Street Duluth, MN 55802	Electronic Service	No	OFF_SL_20-492_Official
Catherine	Phillips	Catherine.Phillips@wecenergygroup.com	Minnesota Energy Resources	231 West Michigan St Milwaukee, WI 53203	Electronic Service	No	OFF_SL_20-492_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Kevin	Pranis	kpranis@liunagroc.com	Laborers' District Council of MN and ND	81 E Little Canada Road St. Paul, Minnesota 55117	Electronic Service	No	OFF_SL_20-492_Official
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_20-492_Official
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_20-492_Official
Susan	Romans	sromans@allete.com	Minnesota Power	30 West Superior Street Legal Dept Duulth, MN 55802	Electronic Service	No	OFF_SL_20-492_Official
Richard	Savelkoul	rsavelkoul@martinsquires.com	Martin & Squires, P.A.	332 Minnesota Street Ste W2750 St. Paul, MN 55101	Electronic Service	No	OFF_SL_20-492_Official
Larry L.	Schedin	Larry@LLSResources.com	LLS Resources, LLC	332 Minnesota St, Ste W1390 St. Paul, MN 55101	Electronic Service	No	OFF_SL_20-492_Official
Elizabeth	Schmiesing	eschmiesing@winthrop.com	Winthrop & Weinstine, P.A.	225 South Sixth Street Suite 3500 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-492_Official
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th Pl E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_20-492_Official
Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates	7400 Lyndale Ave S Ste 190 Richfield, MN 55423	Electronic Service	No	OFF_SL_20-492_Official
David	Shaffer	dshaffer@mnseia.org		N/A	Electronic Service	No	OFF_SL_20-492_Official

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	OFF_SL_20-492_Official
Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.	76 W Kellogg Blvd St. Paul, MN 55102	Electronic Service	No	OFF_SL_20-492_Official
Amanda	Smith	amanda.smith@state.mn.us	MN Pollution Control Agency	520 Lafayette Rd N St. Paul, MN 55155	Electronic Service	No	OFF_SL_20-492_Official
Peggy	Sorum	peggy.sorum@centerpointenergy.com	CenterPoint Energy	505 Nicollet Mall Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-492_Official
Jamez	Staples	jstaples@renewablepartners.com	Renewable Energy Partners	3033 Excelsior Blvd S Minneapolis, MN 55416	Electronic Service	No	OFF_SL_20-492_Official
Byron E.	Starns	byron.starns@stinson.com	STINSON LLP	50 S 6th St Ste 2600 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-492_Official
Richard	Stasik	richard.stasik@wecenergygroup.com	Minnesota Energy Resources Corporation (HOLDING)	231 West Michigan St - P321 Milwaukee, WI 53203	Electronic Service	No	OFF_SL_20-492_Official
Kristin	Stastny	kstastny@taftlaw.com	Taft Stettinius & Hollister LLP	2200 IDS Center 80 South 8th St Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-492_Official
Cary	Stephenson	cStephenson@otpc.com	Otter Tail Power Company	215 South Cascade Street Fergus Falls, MN 56537	Electronic Service	No	OFF_SL_20-492_Official
James M	Strommen	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered	150 S 5th St Ste 700 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-492_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Eric	Swanson	eswanson@winthrop.com	Winthrop & Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_20-492_Official
Lynnette	Sweet	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_20-492_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_20-492_Official
Thomas	Tynes	jjazynka@energyfreedomcoalition.com	Energy Freedom Coalition of America	101 Constitution Ave NW Ste 525 East Washington, DC 20001	Electronic Service	No	OFF_SL_20-492_Official
Ana	Vang	avang@mnpower.com	Minnesota Power	30 W Superior St Duluth, MN 558022093	Electronic Service	No	OFF_SL_20-492_Official
Lisa	Veith	lisa.veith@ci.stpaul.mn.us	City of St. Paul	400 City Hall and Courthouse 15 West Kellogg Blvd. St. Paul, MN 55102	Electronic Service	No	OFF_SL_20-492_Official
Laurie	Williams	laurie.williams@sierraclub.org	Sierra Club	Environmental Law Program 1536 Wynkoop St Ste 200 Denver, CO 80202	Electronic Service	No	OFF_SL_20-492_Official
Samantha	Williams	swilliams@nrdc.org	Natural Resources Defense Council	20 N. Wacker Drive Ste 1600 Chicago, IL 60606	Electronic Service	No	OFF_SL_20-492_Official
Justin	Wilson	justin.wilson@chargepoint.com	ChargePoint	240 East Hacienda Ave. Campbell, CA 95008	Electronic Service	No	OFF_SL_20-492_Official

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_20-492_Official
Patrick	Zomer	Patrick.Zomer@lawmoss.com	Moss & Barnett a Professional Association	150 S. 5th Street, #1200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-492_Official