

October 4, 2021

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

RE: **Comments of the Minnesota Commerce Department, Division of Energy Resources**
Docket No. E017/M-21-228

Dear Mr. Seuffert:

Attached are the Comments of the Minnesota Commerce Department, Division of Energy Resources (Department) in the following matter:

Otter Tail Power's 2020 Demand Side Management Financial Incentive Project and Annual Filing to Update the Conservation Improvement Project Rider (*Petition*)

The *Petition* was filed on April 1, 2021 by:

Jason Grenier
Manager, Market Planning
Otter Tail Power Company
215 South Cascade Street
P.O. Box 496
Fergus Falls, MN 56538-0496

The Department recommends that the Commission **approve Otter Tail's *Petition***. The Department is available to answer any questions that the Minnesota Public Utilities Commission may have.

Sincerely,

/s/ DANIELLE WINNER
Rates Analyst

DW/ja
Attachment



Before the Minnesota Public Utilities Commission

Comments of the Minnesota Department of Commerce Division of Energy Resources

Docket No. E017/M-21-228

I. INTRODUCTION

On April 1, 2021, Otter Tail Power Company (Otter Tail, OTP, or the Company) submitted its annual Conservation Improvement Program (CIP) filing (*Petition*) for 2020 with the Minnesota Public Utilities Commission (Commission) in Docket No. E017/M-21-228. The *Petition* contains the following requests:

- Approval of a Demand Side Management (DSM) financial incentive of \$2,864,948;
- Approval of proposed recoveries and expenditures in the Company's CIP tracker account during 2020 resulting in a year-end 2020 balance of \$2,067,599;
- Approval of a 2021/2022 Conservation Cost Recovery Adjustment (CCRA) of \$0.00582 per kWh for bills rendered on and after October 1, 2020; and
- Approval of a variance to Minnesota Rules part 7820.3500 (E) to allow Otter Tail to continue to combine the Fuel Clause Adjustment (FCA) with the Conservation Improvement Adjustment on customer bills.

The filing also contains the Company's 2020 CIP Status Report (Status Report). The Status Report is intended to fulfill the requirements of the Minnesota Commerce Department, Division of Energy Resources' (Department) annual CIP reporting rules contained in Minnesota Rules part 7690.0550. Since the Company's Status Report does not require Commission approval, this portion of the *Petition* has been assigned to a separate docket.¹

II. COMMISSION'S 2020 ORDER

On August 18, 2020, the Commission issued its *Order* in Docket No. E017/M-20-451 (Docket 20-451) (August 18th Order). The August 18th Order:

1. Approved a financial incentive of \$2,718,378 for Otter Tail's 2019 CIP achievements;
2. Approved Otter Tail's 2019 CIP tracker account resulting in a December 31, 2019 tracker balance of \$3,955,955;
3. Approved a CCRA of \$0.00485 per kWh, to be effective October 1, 2020;
4. Granted a variance to Minnesota Rules parts 7820.3500(K) and 7825.2600 for one year after the date of that August 18th Order;
5. Directed Otter Tail to submit a compliance filing within ten days of that August 18th Order with revised tariff sheets reflecting the Commission's determinations in this matter; and
6. Became effective immediately.

¹ See Docket No. E017/CIP-16-116.04.

The Company submitted its compliance filing on August 21, 2020 to fulfill the Commission's Order Point 5. The Department submitted a compliance review on September 29, 2020.

III. DEPARTMENT ANALYSIS

The Department provides its analysis of Otter Tail's *Petition* below in the following sections:

- In Section III.A, Otter Tail's Proposed 2020 Shared Savings DSM Financial Incentive;
- In Section III.B, Otter Tail's Proposed 2020 CIP Tracker;
- In Section III.C, Otter Tail's proposed CCRA for 2021/2022;
- In Section III.D, Otter Tail's request for variances to Minnesota Rules part 7820.3500 (E); and
- In Section III.E, Otter Tail's historical CIP achievements and incentives.

A. OTTER TAIL'S 2020 DSM FINANCIAL INCENTIVES

1. Background of DSM Financial Incentive

The Shared Savings DSM financial incentive plan was initially approved by the Commission in Docket No. E,G999/CI-08-133 on January 27, 2010. The Commission approved a modified Shared Savings DSM financial incentive mechanism in that same docket in its August 5, 2016 *Order Adopting Modifications to Shared Savings Demand-Side Management Financial Incentive Plan* (August 5, 2016 Order). The new mechanism, which began January 1, 2017, is triggered when electric utilities achieve energy savings of 1 percent, and gas utilities achieve 0.7 percent, of the utility's most recent three-year average of weather-normalized retail sales.² That *Order* covered years 2017-2019, and in a different *Order*, the Commission extended the 2019 parameters to 2020.³ For 2020, therefore, the electric and gas incentives are capped at 10 percent of net benefits and 30 percent of Conservation Improvement Program expenditures. The Commission's August 5, 2016 Order included the following:

1. The Commission hereby revises its Shared Savings DSM Financial Incentive Plan with the modifications set forth below.

A. For electric utilities, the plan is modified to do the following:

- 1) Authorize financial incentives for a utility that achieves energy savings of at least 1.0 percent of the utility's retail sales.

² Excluding retail sales to customers who are owners of a large customer facility and have been granted an exemption by the Department's Commissioner under Minnesota Statutes § 216B.241, Subd. 1a(b).

³ *Order Extending Existing Incentive Formula and Encouraging Discussions for Future Revisions*. February 20, 2020, Docket No. E,G999/CI-08-133.

- 2) For a utility that achieves energy savings equal to 1.0 percent of retail sales, award the utility a share of the net benefits as set forth in Attachment A.
- 3) For each additional 0.1 percent of energy savings the utility achieves, increase the net benefits awarded to the utility by an additional 0.75 percent until the utility achieves savings of 1.7 percent of retail sales.
- 4) For savings levels of 1.7 percent and higher, award the utility a share of the net benefits equal to the Net Benefits Cap.

B. For gas utilities, the plan is modified to do the following:

- 1) Authorize financial incentives for a utility that achieves energy savings of at least 0.7 percent of the utility's retail sales.
- 2) For a utility that achieves energy saving equal to 0.7 percent of retail sales, award the utility a share of the net benefits as set forth in Attachment A.
- 3) For each additional 0.1 percent of energy savings the utility achieves, increase the net benefits awarded to the utility by an additional 0.75 percent until the utility achieves savings of 1.2 percent of retail sales.
- 4) For savings level of 1.2 percent and higher, award the utility a share of the net benefits equal to the Net Benefits Cap.

C. For all utilities, set the following Net Benefit Caps:

- 1) 13.5 percent in 2017,
- 2) 12.0 percent in 2018, and
- 3) 10.0 percent in 2019.

D. For all utilities, set the following Conservation Improvement Plan (CIP) Expenditure Caps:

- 1) 40 percent in 2017,
- 2) 35 percent in 2018, and
- 3) 30 percent in 2019.

2. The Commission retains certain provisions from the current Shared Savings DSM Financial Incentive Plan, with slight modifications, as follows:

- A. CIP-exempt customers shall not be allocated costs for the new shared savings incentive. Sales to CIP-exempt customers shall not be included in the calculation of utility energy savings goals.
 - B. If a utility elects not to include a third-party CIP project, the utility cannot change its election until the beginning of subsequent years.
 - C. If a utility elects to include a third-party project, the project's net benefits and savings will be included in the calculation of the energy savings and will count toward the 1.5 percent savings goal.
 - D. The energy savings, cost, and benefits of modifications to non-third-party projects will be included in the calculation of a utility's DSM incentive.
 - E. The costs of any mandated, non-third-party projects (e.g., the 2007 Next Generation Energy Act assessments,⁶⁸ University of Minnesota Initiative for Renewable Energy and the Environment costs⁶⁹) shall be excluded from the calculation of net benefits and energy savings achieved and incentive awarded.
 - F. Costs, energy savings, and energy production related to Electric Utility Infrastructure Costs,⁷⁰ solar installation,⁷¹ and biomethane purchases⁷² shall not be included in energy savings for DSM financial incentive purposes.
3. The new Shared Savings DSM Incentive Plan shall be in effect for 2017-2019.
 4. Utilities may discontinue the annual February 1 compliance filing because a scale of net benefits will no longer be required since the Department's proposal sets percentages at certain savings thresholds and calibrates the mechanism to dollars per unit of energy.

⁶⁸See 2007 Laws, art. 2

⁶⁹*Id.*, § 3, subd. 6.

⁷⁰Minn. Stat. § 216B.1636

⁷¹Minn. Stat. § 216B.241, subd. 5a.

⁷²*Id.*, subd. 5b.

The instant filing covers CIP activities occurring in 2020, and so the 2020 financial incentive is subject to the following two caps: 10.0 percent of net benefits and 30 percent of expenditures.

Otter Tail estimated that in 2020, the Company incurred CIP expenditures of \$9,643,680,⁴ achieved first year energy savings of 70,649,612 kWh,⁵ and produced net benefits equal to \$35,036,825.⁶ These energy savings are approximately 4.06 percent of Otter Tail's 3-year average weather-normalized, non-CIP-exempt retail sales of 1,741,875,298 kWh. Otter Tail's proposed 2020 DSM incentive is 29.71 percent of the Company's 2020 expenditures and 8.18 percent of the Company's net benefits, and thus does not exceed either of the Commission's 2020 caps.

2. *Department's Review Otter Tail's Status Report and Impact on the Financial Incentive*

Otter Tail requested recovery of a DSM financial incentive of \$2,864,948 for 2020.

In most years, there is a lag between the Otter Tail's request for recovery of an incentive and the completion of the Department's engineering-oriented analysis of the demand and energy savings that underpin the proposed incentive. In last year's review, the Department compensated for this lag by simply assuming Otter Tail's claimed energy savings for 2019 were correct as filed, with the intent to make, in the instant filing, any adjustments approved by the Deputy Commissioner of the Department.

However, the Deputy Commissioner approved Otter Tail Power's 2020 Status Report without any adjustments in Docket No. E015/CIP-16-116.03,⁷ and so no adjustments are required for 2019 activities.

The instant Comments are being filed after the Deputy Commissioner's 2021 Decision for 2020 achievements. The Deputy Commissioner approved Otter Tail's 2021 Status Report without any adjustments in Docket No. E015/CIP-16-116.04, and so no adjustments are required for 2020 activities.⁸

The Department's review indicates that the Company correctly calculated its DSM financial incentive for 2020 CIP achievements; therefore, the Department recommends that the Commission approve OTP's 2020 Shared Savings financial incentive of \$2,864,948.

⁴ Reported CIP expenditures include costs from OTP's Company-Owned Street and Area Lighting Program, less any allowed return from the project's investment.

⁵ Reported energy savings excludes allocated savings from OTP's Company-Owned Street and Area Lighting Program and Publicly-Owned Property Solar Program.

⁶ Reported net benefits amount excludes Next Generation Energy Act Assessments, as well as the following OTP programs: House Therapy, Company-Owned Street and Area Lighting, and Publicly-Owned Property Solar Program.

⁷ Approved by the Department's Deputy Commissioner on August 5, 2020.

⁸ Approved by the Department's Deputy Commissioner on July 8, 2021.

B. OTTER TAIL'S PROPOSED 2020 CIP TRACKER

In its *Petition*, Otter Tail requested approval of its report on recoveries and expenditures included in the Company's 2020 CIP tracker account. This activity is summarized below in Table 1.

Table 1: A Summary of Otter Tail's Proposed 2020 CIP Tracker Account

Line	Description	Time Period	Amount (\$)
1	Beginning Balance	December 31, 2019	3,955,955
2	CIP Expenses	January 1, 2020 through December 31, 2020	9,643,680
3	DSM Financial Incentive	Approved in 2020 for 2019 activities	2,718,378
4	Carrying Charges	January 1, 2020 through December 31, 2020	24,889
5	CIP Expenses Subtotal [Line 1 + Line 2 + Line 3 + Line 4]	January 1, 2020 through December 31, 2020	16,342,902
6	CCRC Recovery	January 1, 2020 through December 31, 2020	(3,619,319)
7	CCRA Recovery	January 1, 2020 through December 31, 2020	(10,655,984)
8	CIP Revenues Subtotal [Line 6 + Line 7]	January 1, 2020 through December 31, 2020	(14,275,303)
9	Ending Balance [Line 5 + Line 8]	December 31, 2020	2,067,599

The Department reviewed Otter Tail's 2020 CIP tracker account and concludes that it is reasonable.

In its July 1, 2020 Comments in Docket 20-451, the Department requested that for future filings Otter Tail provide a live spreadsheet for its CIP tracker, similar to the one provided for the CCRA calculation. The Company does not appear to have provided the requested spreadsheet in the instant filing, so the Department requests that OTP provide it in Reply Comments. The spreadsheet should contain the 2020 tracker activities, including monthly values for sales data, CIP expenses, carrying charges, effective CCRC and CCRA rates, and CCRC versus CCRA revenues, and beginning and ending tracker balances. The Department requests that Otter Tail provide this live spreadsheet in future CIP filings.

C. OTTER TAIL'S PROPOSED CCRA

OTP's current CCRA (CIP Rider) is \$0.00485 per kWh, as approved by the Commission in its August 18th Order. For October 2021 through September 2022, Otter Tail proposed a 20 percent increase in the surcharge to \$0.00582 per kWh.

Table 2 below summarizes the Otter Tail's projected CIP tracker activity for the period that the \$0.00582 rate would be in place. The detailed projection can be found in full as a live spreadsheet attachment to the Company's filing.

Table 2: OTP’s Calculation of the Company’s Proposed CCRA Rate

Line	Description	Time Period	Amount
1	Beginning Balance ⁹	October 1, 2021	\$1,405,642
2	CIP Expenses	October 1, 2021 - September 30, 2022	\$8,600,000
3	DSM Financial Incentive ¹⁰	Projected 2022 incentive for 2021 activities	\$3,000,000
4	Carrying Charges	October 1, 2021 - September 30, 2022	(\$9,924)
5	CIP Expenses Subtotal [Line 1 + Line 2 + Line 3 + Line 4]	October 1, 2021 - September 30, 2022	\$12,995,718
6	CCRC Recovery (\$0.00223/kWh)	October 1, 2021 - September 30, 2022	\$3,598,271
7	Projected Ending Balance	September 30, 2022	\$6,444
8	Remaining Amount to be Recovered through CCRA [Line 5 - Line 6 - Line 7]	October 1, 2021 - September 30, 2022	\$9,391,003
9	Projected Sales (kWh)	October 1, 2021 - September 30, 2022	\$1,613,574,518
10	Proposed CCRA Rate (\$/kWh) [Line 7/Line 8]	Effective October 1, 2021	\$0.00582

The Department typically recommends that the CCRA be set to a value that brings the projected tracker balance to \$0 over the time that the proposed rate is in place. This recommendation is largely due to the fact that maintaining a higher tracker balance engenders associated carrying charges, and thus increases costs to ratepayers. However, the goal of recovering the tracker balance quickly through a higher rate must be balanced with the goal of avoiding rate shock.

Otter Tail projected that its proposal would reduce the Company’s under-recovered CIP tracker balance from \$1,405,642 on October 1, 2021 to \$6,444 on September 30, 2022, resulting in carrying charges of (\$9,924). OTP further estimated that the proposed CCRA change will increase an average residential customer’s bill by \$0.74/month.

Otter Tail’s proposal to set the CCRA at \$0.004582/kWh brings the tracker balance closer to \$0 and reduces the CCRA. The Department therefore concludes that the Company’s proposal is reasonable.

⁹ This beginning balance incorporates the Company’s proposed 2020 financial incentive of \$2,718,378, which Otter Tail would book in September 2020, as shown in Exhibit 1, Page 1 of the Conservation Cost Recovery Adjustment section of its Petition.

¹⁰ This forecasted incentive for 2020 CIP achievements should not be confused with OTP’s proposed incentive of \$2,718,378 for 2019 CIP achievements that Otter Tail proposed in its Petition.

D. OTTER TAIL'S ANNUAL REQUEST FOR VARIANCES FROM COMMISSION RULES

Otter Tail requested a rule variance to Minnesota Rules part 7820.3500 (E), stating that this request is the same one that was made by the Company in prior years so that Otter Tail could continue to combine the FCA with the CCRA on customer bills. As noted in Section II above, the Commission's August 18th, 2020 Order in Docket 20-451 granted a variance to Minnesota Rules parts 7820.3500(K) and 7825.2600 for one year after the date of that Order.

The contents of Minnesota Rules, parts 7820.3500 (E and K) and Minnesota Rules, part 7825.2600 are as follows:

7820.3500 BILLING CONTENT.

Bills rendered periodically to customers for electric and gas service shall include, but are not limited to, the following information:

B. a complete itemization of all charges incurred at each level of customer usage;

K. fuel or power adjustment clause separately itemized, if applicable;

7825.2600 ELECTRIC ENERGY ADJUSTMENT.

Subpart 1. Computation generally.

The computations of the automatic adjustment to charges must conform to the procedures set forth in this part.

The amount of the billing period adjustment to charges must be determined by extending kilowatt-hour sales in the billing period by an adjustment per Kwh. The adjustment per Kwh or the amount of the adjustment must be stated on the customer's bill to comply with parts 7820.3500 and 7820.3600.

Subp. 2. Adjustment per Kwh.

The adjustment per Kwh is the sum of the current period cost of energy purchased and cost of fuel consumed per Kwh less the base electric cost per Kwh. However, a utility that purchases at least 75 percent of its annual total Kwh sales may also separately add, upon commission approval, an additional adjustment per Kwh equal to the difference between the purchased demand cost and the base electric cost of purchased demand. This purchased demand cost adjustment is to be computed annually for the previous year less the demand base electric cost per Kwh.

Subp. 3. When adjustments calculated, applied.

The adjustment to charges must be made in the next complete billing period succeeding the determination of the adjustment per Kwh, provided the adjustment has been filed as defined by part 7825.2900. The adjustment factor must be calculated monthly. However, a self-billing utility may calculate the adjustment less frequently, upon commission approval but at least annually, and shall provide for a settlement procedure. The adjustment must be applied each month. The adjustment amount must be rounded such that the projected recovery is within two percent of the change in total cost.

The Department reviewed Otter Tail’s past ten CIP filings, with the corresponding Commission Orders, to determine what the Company has requested, and what actions the Commission has taken in the past. Table 3 below summarizes the Company’s requests and the Commission’s actions:

Table 3: Otter Tail’s Requested Variances to Minnesota Rules and Commission’s Decisions, CIP Dockets 2012-2021

Docket Number	Otter Tail Requested Variance From:	Commission Granted Variance To:
21-228	Minnesota Rules 7820.3500 (E)	To be determined
20-451	Minnesota Rules 7820.3500 (K) and 7825.2600	Minnesota Rules 7820.3500 (K) and 7825.2600
19-256	Minnesota Rules 7820.3500 (E and K)	Minnesota Rules 7820.3500 (K) and 7825.2600
18-119	Minnesota Rules 7820.3500 (E and K)	Minnesota Rules 7820.3500 (K) and 7825.2600
17-256	Minnesota Rules 7820.3500 (E and K)	Minnesota Rules 7820.3500
16-278	Minnesota Rules 7820.3500 (E and K)	Minnesota Rules 7820.3500 (K) and 7825.2600
15-279	Minnesota Rules 7820.3500 (E and K)	Minnesota Rules 7820.3500 (K) and 7825.2600
14-201	Minnesota Rules 7820.3500 (E and K)	Minnesota Rules 7820.3500 (K) and 7825.2600
13-171	Minnesota Rules 7820.3500 (K) and 7825.2600	Minnesota Rules 7820.3500 (K) and 7825.2600
12-211	Minnesota Rules 7820.3500 (K) and 7825.2600	Minnesota Rules 7820.3500 (K) and 7825.2600

The Department observes that over the past ten years, Otter Tail has requested a variance from different combinations of rules, but the Commission has granted a variance to Minnesota Rules 7820.3500 (K) and 7825.2600 in nine of the ten years. The Commission does not appear to have granted a variance to Minnesota Rules 783500 (E) during this time.

In prior years, the Department has summarized Minnesota Rules, part 7820.3500(K) and 7825.2600 thusly:

- Minnesota Rules part 7820.3500 (K) requires the fuel clause adjustment to be listed on customers’ bills as a separate line item; and
- Minnesota Rules part 7825.2600 states that the FCA should be stated on a per-kWh basis on customer bills.

In prior years, the Department has also noted that a variance to Minnesota Rules part 7820.3500 (E) does not appear to be necessary for the Company to combine the FCA and CIP adjustment rate on one bill line-item called a "Resource Adjustment." The Commission has never granted a variance from this rule, yet Otter Tail appears to have been having no trouble combining the FCA and CIP adjustment rates.

Minnesota Rules part 7829.3200 authorizes the Commission to grant a variance to its rule when:

- Enforcement of the rule would impose an excessive burden upon the applicant or others affected by the rule;
- Granting the variance would not adversely affect the public interest; and
- Granting the variance would not conflict with standards imposed by law.

With respect to the first rule requirement, Otter Tail stated that the Company has been combining its FCA and CIP Rider as a Resource Adjustment line item on customers' bills since July 1995, and that customers have become familiar with the single line-item on their bills. With respect to the second rule requirement, Otter Tail stated that continuation of the variances would not adversely affect the public interest and may avoid customer confusion if the presentation of customers' bills were altered at this time. With respect to the third rule requirement, Otter Tail stated that there are no statutory provisions that would prohibit the Commission from granting the variance.

Based on its review of the Company's rationale for the proposed variances, the Department concludes that Otter Tail has met the conditions set forth in Minnesota Rules part 7829.3200 for the Commission to grant variances to Minnesota Rules part 7820.3500 (K) and 7825.2600. The Department recommends that the Commission, as it has in past years, grant variances to these rules effective until the Commission issues an Order setting the Company's 2022-2023.

E. HISTORY OF OTTER TAIL'S CIP ACHIEVEMENTS AND FINANCIAL INCENTIVES

The Department provides a summary of historical CIP-related information for Otter Tail in Attachment A, which covers the period from years 2007 (the year of the passage of the Next Generation Energy Act) through 2020. In addition, the Department developed Table 4 below, reproduced largely from Otter Tail's *Petition*, which summarizes the Company's DSM financial incentives, CIP expenditures, reported energy savings, and first-year average cost per kWh saved for the past five years.

Table 4: Selected Summary Statistics for Otter Tail’s CIP Program (2016-2020)¹¹

Description	2016	2017	2018	2019	2020 (proposed)
DSM Financial Incentive	\$5,031,678	\$2,642,360	\$3,004,311	\$2,718,378	\$2,864,948
CIP Expenditures	\$7,770,781	\$6,491,039	\$9,027,762	\$9,116,722	\$9,643,680
Achieved Energy Savings	57,586,052	52,497,167	70,237,937	65,418,478	70,649,612
Average Cost Per kWh Saved (does not include incentive)	\$0.13	\$0.12	\$0.13	\$0.14	\$0.14

The Department observes that between 2016 and 2020, Otter Tail’s DSM financial incentive has decreased significantly, consistent with the Commission’s revised calculation methodology approved in Docket No. E,G999/CI-08-133 and outlined in Section III.A.1 above. Despite this decline, Otter Tail has increased both spending and savings, and thus has maintained a very consistent cost per kWh saved.

The Department further examined energy savings, demand savings, expenditures, and incentive values for select years between 2008 and 2020. In Table 5 below, the Department compared 2020 values to 2019 values, 2020 values to average 2018-2020 values, and average 2018-2020 values to average 2008-2010 values.

Table 5: Savings, Expenditures, and Incentives for Selected Years, 2008-2020¹²

	Energy Savings (kWh)	Demand Savings (kW)	CIP Expenditures	Shared Savings Incentive
2020	70,649,612	27,631	\$9,643,680	\$2,864,948
2019	65,418,478	28,515	\$9,116,722	\$2,718,378
Average 2018-2020	68,768,676	28,089	\$9,262,721	\$2,862,546
Average 2008-2010	27,831,263	5,798	\$3,823,014	\$1,635,465
Compare 2020 to 2019	8.00%	-3.10%	5.78%	5.39%
Compare 2020 to Avg 2018-2020	2.74%	-1.63%	4.11%	0.08%
Compare Avg 2018-2020 to Avg 2008-2010	147.09%	384.43%	142.29%	75.03%

¹¹ Data reflects savings and expenditures used to calculate the financial incentive, and thus does not include allocated savings from Otter Tail’s Publicly-Owned Property Solar, Company-Owned Street and Area Lighting, or Made in Minnesota programs, as well as expenditures due to return on investment from the Company-Owned Street and Area Lighting program.

¹² Data reflects savings and expenditures used to calculate the financial incentive, and thus does not include allocated savings from Otter Tail’s Publicly-Owned Property Solar or Company-Owned Street and Area Lighting programs, as well as expenditures due to return on investment from the Company-Owned Street and Area Lighting program.

The Department observes that Otter Tail's energy savings, expenditures, and incentive increased slightly from 2019 to 2020, while demand savings decreased slightly over the same period. Across each category, 2020 values were very similar to 2018-2020 averages, indicating that the Company is in a time of relative stability across these metrics.

The changes between the 2008-2010 period and the 2018-2020 period were much more dramatic. Between these periods, the financial incentive grew 75 percent, energy savings and expenditures grew 145 percent, and demand savings grew 385 percent.

IV. DEPARTMENT RECOMMENDATIONS

The Department concludes that Otter Tail's filing is generally reasonable. The Department requests that in reply comments and in future filings, the Company provide live spreadsheets of both the projected tracker and the prior year's tracker, including in both monthly values for sales data, CIP expenses, carrying charges, effective CCRC and CCRA rates, and CCRC versus CCRA revenues, and beginning and ending tracker balances.

The Department recommends that the Commission:

1. approve a DSM financial incentive of \$2,864,948 for Otter Tail's 2020 CIP achievements;
2. approve Otter Tail's 2020 CIP tracker account, as summarized in Table 1 above, resulting in a December 31, 2020 tracker balance of \$2,067,599;
3. approve a CCRA of \$0.00582 per kWh, to be effective the first month after Commission approval;
4. grant Otter Tail a variance to Minnesota Rules part 7820.3500 (K) and a variance to Minnesota Rules part 7825.2600 for one year after the issue date of the Commission's *Order* in the present docket; and
5. require Otter Tail to submit a compliance filing, within 10 days of the issue date of the *Order* in the present docket, with revised tariff sheets reflecting the Commission's determinations in this matter.

The Department is available to answer any questions the Commission may have.

Table 1. Otter Tail Power’s Historical CIP Achievements, Incentives, and Tracker Balance 2007-2020 (2020 reflects OTP proposed values)¹³

Column ID	A	B	C	D	E	F	G	H	I	J	K	L	M	
Year	OTP CIP Docket No.	CIP Expenditures (Excludes Incentives)	Achieved First Year Energy Savings (kWh)	Net Benefits	DSM Financial Incentive	Carrying Charges	Year-End Tracker Balance	Average Cost per kWh Saved (excludes incentive) G = (A/B)	Average Cost per kWh Saved (includes incentive) H = (A+D)/B	Incentive as a % of CIP Expend’s I = (D/A)	Incentive as a % of Net Benefits J = (D/C)	Incentive per kWh saved K = (D/B)	Carrying Charges as a % of Expend’s L = (E/A)	Year-End Tracker Balance as a % of Expend’s M = (F/A)
2007	08-335	\$1,862,697	11,468,831	\$6,815,485	\$25,066			\$0.16	\$0.16	1%	0.4%	\$0.00		
2008	09-199	\$2,345,874	15,994,719	\$9,891,448	\$273,798	(\$4,830)	\$265,056	\$0.15	\$0.16	12%	3%	\$0.02	-0.2%	11%
2009	10-220	\$4,093,050	35,706,319	\$35,624,398	\$1,101,060	\$26,437	\$1,927,314	\$0.11	\$0.15	27%	3%	\$0.03	0.6%	47%
2010	11-243, 11-185	\$5,030,119	31,792,750	\$28,444,292	\$3,531,538	\$146,441	\$3,721,665	\$0.16	\$0.27	70%	12%	\$0.11	2.9%	74%
2011	12-211	\$4,344,581	27,957,635	\$19,307,820	\$2,608,098	\$221,862	\$5,188,129	\$0.16	\$0.25	60%	14%	\$0.09	5.1%	119%
2012	13-171	\$4,816,994	30,793,654	\$21,167,988	\$2,681,575	\$222,097	\$3,572,621	\$0.16	\$0.24	56%	13%	\$0.09	4.6%	74%
2013	14-201	\$5,253,935	35,792,002	\$32,764,856	\$4,026,600	\$237,859	\$4,835,558	\$0.15	\$0.26	77%	12%	\$0.11	4.5%	92%
2014	15-279	\$5,188,931	33,805,392	\$26,275,803	\$2,957,972	\$219,788	\$5,731,183	\$0.15	\$0.24	57%	11%	\$0.09	4.2%	110%
2015	16-278	\$6,105,445	48,652,628	\$38,079,065	\$4,257,105	\$31,473	\$4,333,061	\$0.13	\$0.21	70%	11%	\$0.09	0.5%	71%
2016	17-246	\$7,770,781	57,586,052	\$49,918,210	\$5,031,678	\$26,368	\$4,835,852	\$0.13	\$0.22	65%	10%	\$0.09	0.3%	62%
2017	18-119	\$6,491,039	52,497,167	\$23,626,518	\$2,642,360	\$102,386	\$7,362,345	\$0.12	\$0.17	41%	11%	\$0.05	1.6%	113%
2018	19-256	\$9,027,762	70,237,937	\$35,041,670	\$3,004,311	\$120,007	\$5,994,017	\$0.13	\$0.17	33%	9%	\$0.04	1.3%	66%
2019	20-451	\$9,116,722	65,418,478	\$33,006,480	\$2,718,378	\$59,342	\$3,955,955	\$0.14	\$0.18	30%	8%	\$0.04	0.7%	43%
2020	21-228	\$9,643,680	70,649,612	\$35,036,825	\$2,864,948	\$24,889	\$2,067,599	\$0.14	\$0.18	30%	8%	\$0.04	0.3%	21%

¹³ Department does not have 2007 carrying charge and tracker balance information at the time of this filing.

CERTIFICATE OF SERVICE

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

**Minnesota Department of Commerce
Comments**

Docket No. E017/M-21-228

Dated this 4th day of **October 2021**

/s/Sharon Ferguson

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Tom	Balster	tombalster@alliantenergy.com	Interstate Power & Light Company	PO Box 351 200 1st St SE Cedar Rapids, IA 524060351	Electronic Service	No	OFF_SL_21-228_M-21-228
Lisa	Beckner	lbeckner@mnpower.com	Minnesota Power	30 W Superior St Duluth, MN 55802	Electronic Service	No	OFF_SL_21-228_M-21-228
Rebekah	Billings	rebekah.billings@centerpointenergy.com	CenterPoint Energy Minnesota Gas	505 Nicollet Mall Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-228_M-21-228
William	Black	bblack@mmua.org	MMUA	Suite 200 3131 Fernbrook Lane North Plymouth, MN 55447	Electronic Service	No	OFF_SL_21-228_M-21-228
Christina	Brusven	cbrusven@fredlaw.com	Fredrikson Byron	200 S 6th St Ste 4000 Minneapolis, MN 554021425	Electronic Service	No	OFF_SL_21-228_M-21-228
Charlie	Buck	charlie.buck@oracle.com	Oracle	760 Market St FL 4 San Francisco, CA 94102	Electronic Service	No	OFF_SL_21-228_M-21-228
Ray	Choquette	rchoquette@agp.com	Ag Processing Inc.	12700 West Dodge Road PO Box 2047 Omaha, NE 68103-2047	Electronic Service	No	OFF_SL_21-228_M-21-228
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_21-228_M-21-228
Brooke	Cooper	bcooper@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022191	Electronic Service	No	OFF_SL_21-228_M-21-228
George	Crocker	gwillc@nawo.org	North American Water Office	PO Box 174 Lake Elmo, MN 55042	Electronic Service	No	OFF_SL_21-228_M-21-228

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Patrick	Deal	pdeal@mnchamber.com	Minnesota Chamber of Commerce	400 Robert St N Ste 1500 Saint Paul, MN 55101	Electronic Service	No	OFF_SL_21-228_M-21-228
Steve	Downer	sdowner@mmua.org	MMUA	3025 Harbor Ln N Ste 400 Plymouth, MN 554475142	Electronic Service	No	OFF_SL_21-228_M-21-228
Charles	Drayton	charles.drayton@enbridge.com	Enbridge Energy Company, Inc.	7701 France Ave S Ste 600 Edina, MN 55435	Electronic Service	No	OFF_SL_21-228_M-21-228
Jim	Erchul	jerchul@dbnhs.org	Daytons Bluff Neighborhood Housing Sv.	823 E 7th St St. Paul, MN 55106	Electronic Service	No	OFF_SL_21-228_M-21-228
James C.	Erickson	jericksonkbc@gmail.com	Kelly Bay Consulting	17 Quechee St Superior, WI 54880-4421	Electronic Service	No	OFF_SL_21-228_M-21-228
Greg	Ernst	gaernst@q.com	G. A. Ernst & Associates, Inc.	2377 Union Lake Trl Northfield, MN 55057	Electronic Service	No	OFF_SL_21-228_M-21-228
Melissa S	Feine	melissa.feine@semcac.org	SEMCAC	PO Box 549 204 S Elm St Rushford, MN 55971	Electronic Service	No	OFF_SL_21-228_M-21-228
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_21-228_M-21-228
Karolanne	Foley	Karolanne.foley@dairylandpower.com	Dairyland Power Cooperative	PO Box 817 La Crosse, WI 54602-0817	Electronic Service	No	OFF_SL_21-228_M-21-228
Rob	Friend	rfriend@mnchamber.com	Minnesota Chamber of Commerce - MN Waste Wise Foundation	400 Robert St N Ste 1500 Saint Paul, MN 55101	Electronic Service	No	OFF_SL_21-228_M-21-228

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Jessica	Fyhrie	jfyhrie@otpc.com	Otter Tail Power Company	PO Box 496 Fergus Falls, MN 56538-0496	Electronic Service	Yes	OFF_SL_21-228_M-21-228
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_21-228_M-21-228
Angela E.	Gordon	agordon@trccompanies.com	Lockheed Martin	1000 Clark Ave. St. Louis, MO 63102	Electronic Service	No	OFF_SL_21-228_M-21-228
Pat	Green	N/A	N Energy Dev	City Hall 401 E 21st St Hibbing, MN 55746	Paper Service	No	OFF_SL_21-228_M-21-228
Jason	Grenier	jgrenier@otpc.com	Otter Tail Power Company	215 South Cascade Street Fergus Falls, MN 56537	Electronic Service	No	OFF_SL_21-228_M-21-228
Jeffrey	Haase	jhaase@grenergy.com	Great River Energy	12300 Elm Creek Blvd Maple Grove, MN 55369	Electronic Service	No	OFF_SL_21-228_M-21-228
Tony	Hainault	anthony.hainault@co.hennepin.mn.us	Hennepin County DES	701 4th Ave S Ste 700 Minneapolis, MN 55415-1842	Electronic Service	No	OFF_SL_21-228_M-21-228
Tyler	Hamman	tylerh@bepc.com	Basin Electric Power Cooperative	1717 E Interstate Ave Bismarck, ND 58501	Electronic Service	No	OFF_SL_21-228_M-21-228
Patty	Hanson	phanson@rpu.org	Rochester Public Utilities	4000 E River Rd NE Rochester, MN 55906	Electronic Service	No	OFF_SL_21-228_M-21-228
Norm	Harold	N/A	NKS Consulting	5591 E 180th St Prior Lake, MN 55372	Paper Service	No	OFF_SL_21-228_M-21-228

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Adam	Heinen	aheinen@dakotaelectric.com	Dakota Electric Association	4300 220th St W Farmington, MN 55024	Electronic Service	No	OFF_SL_21-228_M-21-228
Jared	Hendricks	jared.hendricks@owatonnautilities.com	Owatonna Municipal Public Utilities	PO Box 800 208 S Walnut Ave Owatonna, MN 55060-2940	Electronic Service	No	OFF_SL_21-228_M-21-228
Shane	Henriksen	shane.henriksen@enbridge.com	Enbridge Energy Company, Inc.	1409 Hammond Ave FL 2 Superior, WI 54880	Electronic Service	No	OFF_SL_21-228_M-21-228
Holly	Hinman	holly.r.hinman@xcelenergy.com	Xcel Energy	414 Nicollet Mall, 7th Floor Minneapolis, MN 55401	Electronic Service	No	OFF_SL_21-228_M-21-228
Dave	Johnson	dave.johnson@aeoa.org	Arrowhead Economic Opportunity Agency	702 3rd Ave S Virginia, MN 55792	Electronic Service	No	OFF_SL_21-228_M-21-228
Deborah	Knoll	dknoll@mnpower.com	Minnesota Power	30 W Superior St Duluth, MN 55802	Electronic Service	No	OFF_SL_21-228_M-21-228
Tina	Koecher	tkoecher@mnpower.com	Minnesota Power	30 W Superior St Duluth, MN 558022093	Electronic Service	No	OFF_SL_21-228_M-21-228
Kelly	Lady	kellyl@austinutilities.com	Austin Utilities	400 4th St NE Austin, MN 55912	Electronic Service	No	OFF_SL_21-228_M-21-228
James D.	Larson	james.larson@avantenergy.com	Avant Energy Services	220 S 6th St Ste 1300 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-228_M-21-228
Erica	Larson	erica.larson@centerpointenergy.com	CenterPoint Energy	505 Nicollet Avenue P.O. Box 59038 Minneapolis, Minnesota 55459-0038	Electronic Service	No	OFF_SL_21-228_M-21-228

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Martin	Lepak	Martin.Lepak@aeoa.org	Arrowhead Economic Opportunity	702 S 3rd Ave Virginia, MN 55792	Electronic Service	No	OFF_SL_21-228_M-21-228
Corey	Lubovich	coreyl@hpuc.com	Hibbing Public Utilities Commission	1902 6th Ave E Hibbing, MN 55746	Electronic Service	No	OFF_SL_21-228_M-21-228
Kavita	Maini	kmairi@wi.rr.com	KM Energy Consulting, LLC	961 N Lost Woods Rd Oconomowoc, WI 53066	Electronic Service	No	OFF_SL_21-228_M-21-228
Pam	Marshall	pam@energycents.org	Energy CENTS Coalition	823 7th St E St. Paul, MN 55106	Electronic Service	No	OFF_SL_21-228_M-21-228
Scot	McClure	scotmcclure@alliantenergy.com	Interstate Power And Light Company	4902 N Biltmore Ln PO Box 77007 Madison, WI 537071007	Electronic Service	No	OFF_SL_21-228_M-21-228
John	McWilliams	John.McWilliams@DairylandPower.com	Dairyland Power Cooperative	3200 East Ave SPO Box 817 La Crosse, WI 54601-7227	Electronic Service	No	OFF_SL_21-228_M-21-228
Brian	Meloy	brian.meloy@stinson.com	STINSON LLP	50 S 6th St Ste 2600 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-228_M-21-228
David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022093	Electronic Service	No	OFF_SL_21-228_M-21-228
Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP	33 South Sixth St Ste 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-228_M-21-228
Carl	Nelson	cnelson@mncee.org	Center for Energy and Environment	212 3rd Ave N Ste 560 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_21-228_M-21-228

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_21-228_M-21-228
Matthew	Olsen	molsen@otpc.com	Otter Tail Power Company	215 South Cascade Street Fergus Falls, MN 56537	Electronic Service	No	OFF_SL_21-228_M-21-228
Audrey	Partridge	apartridge@mncee.org	Center for Energy and Environment	212 3rd Ave. N. Suite 560 Minneapolis, Minnesota 55401	Electronic Service	No	OFF_SL_21-228_M-21-228
Lisa	Pickard	lseverson@minnkota.com	Minnkota Power Cooperative	5301 32nd Ave S Grand Forks, ND 58201	Electronic Service	No	OFF_SL_21-228_M-21-228
Bill	Poppert	info@technologycos.com	Technology North	2433 Highwood Ave St. Paul, MN 55119	Electronic Service	No	OFF_SL_21-228_M-21-228
Dave	Reinke	dreinke@dakotaelectric.com	Dakota Electric Association	4300 220th St W Farmington, MN 55024-9583	Electronic Service	No	OFF_SL_21-228_M-21-228
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_21-228_M-21-228
Christopher	Schoenherr	cp.schoenherr@smmpa.org	SMMPA	500 First Ave SW Rochester, MN 55902-3303	Electronic Service	No	OFF_SL_21-228_M-21-228
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_21-228_M-21-228
Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.	76 W Kellogg Blvd St. Paul, MN 55102	Electronic Service	No	OFF_SL_21-228_M-21-228

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Anna	Sommer	ASommer@energyfuturesgroup.com	Energy Futures Group	PO Box 692 Canton, NY 13617	Electronic Service	No	OFF_SL_21-228_M-21-228
Russ	Stark	Russ.Stark@ci.stpaul.mn.us	City of St. Paul	390 City Hall 15 West Kellogg Boulevard Saint Paul, MN 55102	Electronic Service	No	OFF_SL_21-228_M-21-228
Cary	Stephenson	cStephenson@otpc.com	Otter Tail Power Company	215 South Cascade Street Fergus Falls, MN 56537	Electronic Service	Yes	OFF_SL_21-228_M-21-228
Lynnette	Sweet	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_21-228_M-21-228
Stuart	Tommerdahl	stommerdahl@otpc.com	Otter Tail Power Company	215 S Cascade St PO Box 496 Fergus Falls, MN 56537	Electronic Service	Yes	OFF_SL_21-228_M-21-228
Jenny	Unknown	jenny@mrea.org	Minnesota Rural Electric Association	11640 73rd Ave N Maple Grove, MN 55369	Electronic Service	No	OFF_SL_21-228_M-21-228
Kodi	Verhalen	kverhalen@taftlaw.com	Taft Stettinius & Hollister LLP	80 S 8th St Ste 2200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-228_M-21-228
Michael	Volker	mvolker@eastriver.coop	East River Electric Power Coop	211 S. Harth Ave Madison, SD 57042	Electronic Service	No	OFF_SL_21-228_M-21-228
Sharon N.	Walsh	swalsh@shakopeedutilities.com	Shakopee Public Utilities	255 Sarazin St Shakopee, MN 55379	Electronic Service	No	OFF_SL_21-228_M-21-228
Ethan	Warner	ethan.warner@centerpointenergy.com	CenterPoint Energy	505 Nicollet Mall Minneapolis, Minnesota 55402	Electronic Service	No	OFF_SL_21-228_M-21-228

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Robyn	Woeste	robynwoeste@alliantenergy.com	Interstate Power and Light Company	200 First St SE Cedar Rapids, IA 52401	Electronic Service	No	OFF_SL_21-228_M-21-228

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Tom	Balster	tombalster@alliantenergy.com	Interstate Power & Light Company	PO Box 351 200 1st St SE Cedar Rapids, IA 524060351	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
Lisa	Beckner	lbeckner@mnpower.com	Minnesota Power	30 W Superior St Duluth, MN 55802	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
Rebekah	Billings	rebekah.billings@centerpointenergy.com	CenterPoint Energy Minnesota Gas	505 Nicollet Mall Minneapolis, MN 55402	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
William	Black	bblack@mmua.org	MMUA	Suite 200 3131 Fernbrook Lane North Plymouth, MN 55447	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
Christina	Brusven	cbrusven@fredlaw.com	Fredrikson Byron	200 S 6th St Ste 4000 Minneapolis, MN 554021425	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
Charlie	Buck	charlie.buck@oracle.com	Oracle	760 Market St FL 4 San Francisco, CA 94102	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
Ray	Choquette	rchoquette@agp.com	Ag Processing Inc.	12700 West Dodge Road PO Box 2047 Omaha, NE 68103-2047	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
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	No	SPL_SL_CIP SPECIAL SERVICE LIST
George	Crocker	gwillc@nawo.org	North American Water Office	PO Box 174 Lake Elmo, MN 55042	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
Patrick	Deal	pdeal@mnchamber.com	Minnesota Chamber of Commerce	400 Robert St N Ste 1500 Saint Paul, MN 55101	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Steve	Downer	sdowner@mmua.org	MMUA	3025 Harbor Ln N Ste 400 Plymouth, MN 554475142	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
Charles	Drayton	charles.drayton@enbridge.com	Enbridge Energy Company, Inc.	7701 France Ave S Ste 600 Edina, MN 55435	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
Jim	Erchul	jerchul@dbnhs.org	Daytons Bluff Neighborhood Housing Sv.	823 E 7th St St. Paul, MN 55106	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
Greg	Ernst	gaernst@q.com	G. A. Ernst & Associates, Inc.	2377 Union Lake Trl Northfield, MN 55057	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
Melissa S	Feine	melissa.feine@semcac.org	SEMCAC	PO Box 549 204 S Elm St Rushford, MN 55971	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 551012198	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
Karolanne	Foley	Karolanne.foley@dairylandpower.com	Dairyland Power Cooperative	PO Box 817 La Crosse, WI 54602-0817	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
Rob	Friend	rfriend@mnchamber.com	Minnesota Chamber of Commerce - MN Waste Wise Foundation	400 Robert St N Ste 1500 Saint Paul, MN 55101	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
Angela E.	Gordon	agordon@trccompanies.com	Lockheed Martin	1000 Clark Ave. St. Louis, MO 63102	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
Pat	Green	N/A	N Energy Dev	City Hall 401 E 21st St Hibbing, MN 55746	Paper Service	No	SPL_SL_CIP SPECIAL SERVICE LIST

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Jason	Grenier	jgrenier@otpc.com	Otter Tail Power Company	215 South Cascade Street Fergus Falls, MN 56537	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Jeffrey	Haase	jhaase@grenergy.com	Great River Energy	12300 Elm Creek Blvd Maple Grove, MN 55369	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Tony	Hainault	anthony.hainault@co.henn epin.mn.us	Hennepin County DES	701 4th Ave S Ste 700 Minneapolis, MN 55415-1842	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Tyler	Hamman	tylerh@bepc.com	Basin Electric Power Cooperative	1717 E Interstate Ave Bismarck, ND 58501	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Patty	Hanson	phanson@rpu.org	Rochester Public Utilities	4000 E River Rd NE Rochester, MN 55906	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Norm	Harold	N/A	NKS Consulting	5591 E 180th St Prior Lake, MN 55372	Paper Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Jared	Hendricks	jared.hendricks@owatonna utilities.com	Owatonna Municipal Public Utilities	PO Box 800 208 S Walnut Ave Owatonna, MN 55060-2940	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Dave	Johnson	dave.johnson@aeoa.org	Arrowhead Economic Opportunity Agency	702 3rd Ave S Virginia, MN 55792	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Deborah	Knoll	dknoll@mnpower.com	Minnesota Power	30 W Superior St Duluth, MN 55802	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Tina	Koecher	tkoecher@mnpower.com	Minnesota Power	30 W Superior St Duluth, MN 558022093	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Kelly	Lady	kellyl@austinutilities.com	Austin Utilities	400 4th St NE Austin, MN 55912	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Erica	Larson	erica.larson@centerpointenergy.com	CenterPoint Energy	505 Nicollet Avenue P.O. Box 59038 Minneapolis, Minnesota 55459-0038	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Martin	Lepak	Martin.Lepak@aeoa.org	Arrowhead Economic Opportunity	702 S 3rd Ave Virginia, MN 55792	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Corey	Lubovich	coreyl@hpuc.com	Hibbing Public Utilities Commission	1902 6th Ave E Hibbing, MN 55746	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Pam	Marshall	pam@energycents.org	Energy CENTS Coalition	823 7th St E St. Paul, MN 55106	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Scot	McClure	scotmcclure@alliantenergy.com	Interstate Power And Light Company	4902 N Biltmore Ln PO Box 77007 Madison, WI 537071007	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
John	McWilliams	John.McWilliams@DairylandPower.com	Dairyland Power Cooperative	3200 East Ave SPO Box 817 La Crosse, WI 54601-7227	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Brian	Meloy	brian.meloy@stinson.com	STINSON LLP	50 S 6th St Ste 2600 Minneapolis, MN 55402	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022093	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP	33 South Sixth St Ste 4200 Minneapolis, MN 55402	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Carl	Nelson	cnelson@mncee.org	Center for Energy and Environment	212 3rd Ave N Ste 560 Minneapolis, MN 55401	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
Samantha	Norris	samanthanorris@alliantenergy.com	Interstate Power and Light Company	200 1st Street SE PO Box 351 Cedar Rapids, IA 524060351	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
Audrey	Partridge	apartridge@mncee.org	Center for Energy and Environment	212 3rd Ave. N. Suite 560 Minneapolis, Minnesota 55401	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
Lisa	Pickard	lseverson@minnkota.com	Minnkota Power Cooperative	5301 32nd Ave S Grand Forks, ND 58201	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
Bill	Poppert	info@technologycos.com	Technology North	2433 Highwood Ave St. Paul, MN 55119	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
Dave	Reinke	dreinke@dakotaelectric.com	Dakota Electric Association	4300 220th St W Farmington, MN 55024-9583	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
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	No	SPL_SL_CIP SPECIAL SERVICE LIST
Christopher	Schoenherr	cp.schoenherr@smmpa.org	SMMPA	500 First Ave SW Rochester, MN 55902-3303	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th PI E Ste 350 Saint Paul, MN 55101	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.	76 W Kellogg Blvd St. Paul, MN 55102	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Anna	Sommer	ASommer@energyfuturesgroup.com	Energy Futures Group	PO Box 692 Canton, NY 13617	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
Russ	Stark	Russ.Stark@ci.stpaul.mn.us	City of St. Paul	390 City Hall 15 West Kellogg Boulevard Saint Paul, MN 55102	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
Lynnette	Sweet	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
Jenny	Unknown	jenny@mrea.org	Minnesota Rural Electric Association	11640 73rd Ave N Maple Grove, MN 55369	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
Kodi	Verhalen	kverhalen@taftlaw.com	Taft Stettinius & Hollister LLP	80 S 8th St Ste 2200 Minneapolis, MN 55402	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
Michael	Volker	mvolker@eastriver.coop	East River Electric Power Coop	211 S. Harth Ave Madison, SD 57042	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
Sharon N.	Walsh	swalsh@shakopeeutilities.com	Shakopee Public Utilities	255 Sarazin St Shakopee, MN 55379	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
Ethan	Warner	ethan.warner@centerpointenergy.com	CenterPoint Energy	505 Nicollet Mall Minneapolis, Minnesota 55402	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
Robyn	Woeste	robynwoeste@alliantenergy.com	Interstate Power and Light Company	200 First St SE Cedar Rapids, IA 52401	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST