



June 6, 2024

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VIA E-FILING

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

**Re: Exceptions to the ALJ Report
In the Matter of Sherco Unit 3 Energy Replacement Costs
OAH Docket No. 65-2500-38476
PUC Docket Nos. E-002/GR-12-961, E-002/GR-13-868, E-999/AA-13-599,
E-999/AA-14-579, E-999/AA-16-523, E-999/AA-17-492, E-999/AA-18-373**

Dear Mr. Seuffert:

In connection with the above-titled dockets, please find attached for filing the Exceptions to the Findings of Fact, Conclusions of Law, and Recommendations of the Administrative Law Judge submitted on behalf of the Xcel Large Industrials (“XLI”).

By copy of this letter, all parties have been served. A Certificate of Service is also attached.

Very truly yours,

Stoel Rives LLP

/s/ Amber S. Lee

Amber S. Lee

ASL:cal
Enclosures

cc: Service Lists

**BEFORE THE MINNESOTA OFFICE OF
ADMINISTRATIVE HEARINGS**

600 North Robert Street
P.O. Box 64620
St. Paul, MN 55101

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

121 Seventh Place East, Suite 350
St. Paul, MN 55101-2147

In the Matter of the Application of Northern States Power Company for Authority to Increase Rates for Electric Service in the State of Minnesota, et al.

OAH Docket No. 65-2500-38476
PUC Docket No. E-002/GR-12-961

In the Matter of the Application of Northern States Power Company for Authority to Increase Rates for Electric Service in the State of Minnesota

PUC Docket No. E-002/GR-13-868

In the Matter of the Review of the 2012-2013 Annual Automatic Adjustment Reports for All Electric Utilities

PUC Docket No. E-999/AA-13-599

In the Matter of the Review of the 2013-2014 Annual Automatic Adjustment Reports for All Electric Utilities

PUC Docket No. E-999/AA-14-579

In the Matter of the Review of the 2015-2016 Annual Automatic Adjustment Reports for All Electric Utilities

PUC Docket No. E-999/AA-16-523

In the Matter of the Department's Report on the Electric Utilities' 2016-2017 Annual Automatic Adjustment Reports for All Utilities

PUC Docket No. E-999/AA-17-492

In the Matter of the Review of the 2017-2018 Annual Automatic Adjustment Reports for All Electric Utilities

PUC Docket No. E-999/AA-18-373

**EXCEPTIONS TO THE FINDINGS OF FACT, CONCLUSIONS
OF LAW, AND RECOMMENDATIONS OF THE
ADMINISTRATIVE LAW JUDGE
SUBMITTED BY THE XCEL LARGE INDUSTRIALS**

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Flint Hills Resources Pine Bend, LLC; Marathon Petroleum Corporation; and USG Interiors, Inc. (collectively, the “Xcel Large Industrials” or “XLI”)¹ respectively submit the following Exceptions to the Administrative Law Judge’s (“ALJ”) Findings of Fact, Conclusions of Law, and Recommendations (“ALJ Report”) issued on May 14, 2024.² Generally, the ALJ Report is thorough, well-reasoned, and clear in its conclusions and XLI requests the Minnesota Public Utilities Commission (“Commission”) adopt it, with one exception, as described below.

XLI supports the ALJ’s conclusions that:

- Northern States Power Company d/b/a Xcel Energy (“Xcel” or “Company”) failed to satisfy its burden of proof that it operated and maintained Sherco Unit 3 in a reasonable and prudent manner consistent with good utility practices, and Xcel’s failure to conduct necessary inspections and maintenance on Unit 3 contributed to its catastrophic failure;³
- The amount of energy replacement costs incurred by Xcel for Unit 3 from November 2011 to October 2013 is best represented by the Company’s Fuel Clause Adjustment (“FCA”) calculated by Xcel in the 2012-2013 Annual Automatic Adjustment docket, MPUC Docket No. E-999/AA-13-599;⁴ and
- Based on Xcel’s calculations, ratepayers were charged \$41,327,637 in energy replacement costs through the fuel cost adjustment mechanism. Undisputed interest on this amount through January 2025, totals \$30,220,751. Thus, the sum of the energy replacement costs for Unit 3 from November 2011 to October 2013, plus interest, is \$71,548,388.⁵

XLI supports these Conclusions and they are well supported in the record and the ALJ’s Findings of Fact.

¹ XLI is an *ad hoc* consortium of C&I Demand class customers served by Northern States Power Company, d/b/a Xcel Energy (“Xcel” or the “Company”).

² In these Exceptions, XLI refers to the Public version of the ALJ’s Report.

³ See ALJ Report, Conclusion of Law 11, p. 86.

⁴ See ALJ Report, Conclusion of Law 14, p. 86.

⁵ See ALJ Report, Conclusion of Law 15, p. 86.

XLI disagrees, however, with ALJ's Conclusions that Xcel was 48% percent at fault (with the remaining 52% fault assigned to General Electric Company ("GE), the turbine manufacturer), and Xcel should refund only 48% of the total energy replacement costs charged to ratepayers through the FCA, plus interest.⁶ XLI respectfully requests the Commission not adopt the ALJ's Findings and Conclusions of Law in this regard, and instead the Commission should require Xcel to refund 100% of the total costs charged to ratepayers for replacement energy as a result of its imprudent management of Sherco 3.

As Xcel noted, there is "no dispute that the Company settled all claims against GE prior to trial and credited the entirety of the Minnesota jurisdictional portion of that settlement amount to customers through the fuel clause adjustment."⁷ In other words, after years of protracted litigation, Xcel chose to settle with GE, before trial, and therefore Xcel assumed the risk that it would be responsible for costs in excess of the settlement amount. The Commission should require Xcel to refund the entirety of the amount it unjustly collected from ratepayers, plus interest, as offset by the GE settlement amount. Any decision to the contrary would violate Minnesota Statutes 216B.03 and 216B.16, subd. 4, and the Commission's Order for Hearing in this matter.

Citing these statutes, the ALJ correctly noted that "[E]very rate made, demanded, or received by a public utility must be just and reasonable."⁸ The burden to prove a rate is just and reasonable is on the utility.⁹ Any doubt as to reasonableness should be resolved in favor of the consumer.¹⁰ The ALJ also correctly noted that the Commission has instructed "[i]n incurring costs necessary to provide service, utilities are expected to act prudently to protect ratepayers from unreasonable risks."¹¹

1. GE Was Not a Party to This Proceeding

At the outset, the ALJ's provision of fault between Xcel and GE is not supported in the record. GE was not a party to this contested case hearing and therefore it is inappropriate to assign

⁶ See ALJ Report, Conclusion of Law 16, p. 87.

⁷ Xcel Reply Brief, p. 86.

⁸ See ALJ Report, Conclusion of Law 4, p. 85 (citing Minn. Stat. § 216B.03 (2022)).

⁹ See ALJ Report, Conclusion of Law 4, p. 85 (citing Minn. Stat. § 216B.16, subd. 4 (2022)).

¹⁰ See ALJ Report, Conclusion of Law 4, p. 85 (citing Minn. Stat. § 216B.03).

¹¹ See ALJ Report, Conclusion of Law 5, p. 85 (citing NOTICE AND ORDER FOR HEARING at 4 (July 22, 2022) (eDocket No. 20227-187362-07)).

them any fault, or even any role, in the question of whether replacement energy costs should be refunded to customers. GE has no direct relationship or obligation to Xcel's customers, and it did not purchase, and had no influence on Xcel's decision to purchase, the replacement power at issue in this proceeding. No party advocated that GE's role should be considered and no party, not even Xcel, argued that its fault in this proceeding should be offset by GE's.

In fact, in requesting this contested case proceeding, Xcel distinguished this regulatory proceeding from the underlying litigation, stating it did not have a fair opportunity to develop the record on issues material to this regulatory proceeding – e.g., whether Xcel acted prudently according to the standard of a reasonable electric utility – in the litigation. Noting that the trial record was limited by evidentiary rules that bind Minnesota courts but do not govern Commission proceedings, Xcel argued it should have an opportunity to offer additional evidence that may be relevant to the Commission's prudence determination. Asserting that prudence reviews involve complex, technically challenging issues specific to utilities, Xcel recommended that the Commission conduct an independent investigation in which the Commission may leverage its expertise and base its determination on facts pertaining directly to the issue of prudence for purposes of rate recovery.¹² Xcel argued that a contested case is the best procedural framework available for this undertaking. According to Xcel, "courts have held that findings in one proceeding cannot for the basis of an imprudence finding in a cost-recovery proceeding."¹³

Here, Xcel had a duty of care to its customers, and that standard of care is what is at issue in this regulatory proceeding, and Xcel has admitted the underlying litigation was for a different

¹² Xcel Reply Comments, filed in this matter on January 27, 2021, p. 9, stating:

The prudence reviews undertaken by utilities commissions are some of the most complicated and technically challenging issues that come before them. Because of this, Courts have referred to commissioners as "akin to a jury of experts." It is imperative for the Commission to leverage its expertise and base a finding of prudence on facts and evidence bearing directly on that issue, rather than rely on the findings of a jury of laypersons from a trial that was focused on GE's liability. The appropriate next step in making such a decision is referral to the OAH for the further development of the record.

(citations omitted).

¹³ Xcel Reply Comments, filed in this matter on January 27, 2021, p. 7 (citing *Florida Power Corp. v. Florida Pub. Service Comm'n*, 424 So. 2d 745 (1982); *Florida Power Corp. v. Florida Pub. Service Comm'n*, 456 So. 2d 451 (1984)).

purpose, under a different standard, and GE's actions should not be arbitrated, and are completely irrelevant, here.

2. Xcel Bears the Risk of Its Decision to Settle with GE

Perhaps even more importantly, if the ALJ's recommendation in this regard were adopted, ratepayers would pay more than \$37 million for replacement energy even though it is undisputed that the replacement energy costs should never have been incurred or recovered from ratepayers. Ratepayers are not at fault for Xcel's imprudent management of Sherco or its decision to settle with GE. Instead, Xcel, as the utility provider, is "expected to act prudently to protect ratepayers from unreasonable risks." Here, Xcel chose to defer needed maintenance at Sherco 3, which resulted in its catastrophic failure, and Xcel chose to settle with GE and assumed the risk that the settlement amount would not cover the replacement energy costs Xcel imprudently incurred. Costs in excess of that settlement amount cannot be borne by ratepayers; to do so would shift unreasonable risk to them, in contravention of Minnesota statutes and the Commission's Order in this proceeding.

3. Consumers Should Not Pay for Costs Imprudently Incurred

Every rate received by a public utility must be just and reasonable, and the utility has the burden to prove each rate is just and reasonable. Here it is undisputed that the significant energy replacement costs were imprudently incurred, and therefore it would be unjust and unreasonable for ratepayers to pay more than \$37 million of those costs. Xcel chose to settle with GE; ratepayers did not. Any doubt as to reasonableness must be resolved in favor of the consumer and Xcel must bear the responsibility for all imprudent costs the ratepayers incurred in excess of that settlement amount. The ALJ's recommendation for ratepayers to pay more than \$37 million in imprudent costs would result in unjust and unreasonable rates and the Commission should reject this portion of the ALJ's Report.

XLI thanks the Commission for this opportunity to respond to the ALJ's Report and XLI supports all other Findings and Recommendations included therein.

Dated: February 14, 2024

Respectfully submitted,

STOEL RIVES LLP

/s/ Amber S. Lee

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CERTIFICATE OF SERVICE

I, Carmel Laney, hereby certify that I have this day served a true and correct copy of the following document(s) to all persons at the addresses indicated below or on the attached list by electronic filing, electronic mail, courier, interoffice mail or by depositing the same enveloped with postage paid in the United States Mail at Minneapolis, Minnesota.

**EXCEPTIONS TO THE FINDINGS OF FACT, CONCLUSIONS OF LAW, AND
RECOMMENDATIONS OF THE ADMINISTRATIVE LAW JUDGE**

SUBMITTED ON BEHALF OF THE XCEL LARGE INDUSTRIALS (“XLI”)

In the Matter of Sherco Unit 3 Energy
Replacement Costs
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E-999/AA-14-579, E-999/AA-16-523,
E-999/AA-17-492, E-999/AA-18-373

Dated this 6th day of June, 2024.

/s/ Carmel Laney
Carmel Laney

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Tara	Duginske	tara.r.duginske@xcelenergy.com	Northern States Power Company dba Xcel Energy	414 Nicollet Mall, 401-08 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_13-599_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_13-599_Official
Matthew B	Harris	matt.b.harris@xcelenergy.com	XCEL ENERGY	401 Nicollet Mall FL 8 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_13-599_Official
Adam	Heinen	aheinen@dakotaelectric.com	Dakota Electric Association	4300 220th St W Farmington, MN 55024	Electronic Service	No	OFF_SL_13-599_Official
Katherine	Hinderlie	katherine.hinderlie@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota St Suite 1400 St. Paul, MN 55101-2134	Electronic Service	No	OFF_SL_13-599_Official
Amber	Lee	amber.lee@stoel.com	Stoel Rives LLP	33 S. 6th Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_13-599_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Greg	Merz	greg.merz@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	No	OFF_SL_13-599_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_13-599_Official
Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP	33 South Sixth St Ste 4200 Minneapolis, MN 55402	Electronic Service	Yes	OFF_SL_13-599_Official
Travis	Murray	travis.murray@ag.state.mn.us	Office of the Attorney General-RUD	445 Minnesota St Ste 1400 Saint Paul, MN 55101	Electronic Service	No	OFF_SL_13-599_Official
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_13-599_Official
Ann	O'Reilly	ann.oreilly@state.mn.us	Office of Administrative Hearings	PO Box 64620 St. Paul, MN 55101	Electronic Service	No	OFF_SL_13-599_Official
Leann	Oehlerking Boes	lboes@mnpower.com	Minnesota Power	30 W Superior St Duluth, MN 55802	Electronic Service	No	OFF_SL_13-599_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_13-599_Official
Peter	Scholtz	peter.scholtz@ag.state.mn.us	Office of the Attorney General-RUD	Suite 1400 445 Minnesota Street St. Paul, MN 55101-2131	Electronic Service	No	OFF_SL_13-599_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Christine	Schwartz	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_13-599_Official
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th PI E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_13-599_Official
Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates	7400 Lyndale Ave S Ste 190 Richfield, MN 55423	Electronic Service	Yes	OFF_SL_13-599_Official
Lauren	Steinhaeuser	lauren.steinhaeuser@xcelenergy.com	Northern States Power Company dba Xcel Energy	414 Nicollet Mall, 401-08 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_13-599_Official
Eric	Swanson	eswanson@winthrop.com	Winthrop & Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_13-599_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_13-599_Official
Robyn	Woeste	robynwoeste@alliantenergy.com	Interstate Power and Light Company	200 First St SE Cedar Rapids, IA 52401	Electronic Service	No	OFF_SL_13-599_Official

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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_14-579_OFF_SL_14-579_AA-14-579
Richard	Dornfeld	Richard.Dornfeld@ag.state.mn.us	Office of the Attorney General-DOC	Minnesota Attorney General's Office 445 Minnesota Street, Suite 1800 Saint Paul, MN 55101	Electronic Service	No	OFF_SL_14-579_OFF_SL_14-579_AA-14-579
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_14-579_OFF_SL_14-579_AA-14-579
Adam	Heinen	aheinen@dakotaelectric.com	Dakota Electric Association	4300 220th St W Farmington, MN 55024	Electronic Service	No	OFF_SL_14-579_OFF_SL_14-579_AA-14-579
Katherine	Hinderlie	katherine.hinderlie@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota St Suite 1400 St. Paul, MN 55101-2134	Electronic Service	No	OFF_SL_14-579_OFF_SL_14-579_AA-14-579
Sarah	Johnson Phillips	sarah.phillips@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_14-579_OFF_SL_14-579_AA-14-579
Greg	Merz	greg.merz@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	No	OFF_SL_14-579_OFF_SL_14-579_AA-14-579
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_14-579_OFF_SL_14-579_AA-14-579
Travis	Murray	travis.murray@ag.state.mn.us	Office of the Attorney General-RUD	445 Minnesota St Ste 1400 Saint Paul, MN 55101	Electronic Service	No	OFF_SL_14-579_OFF_SL_14-579_AA-14-579

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Ann	O'Reilly	ann.oreilly@state.mn.us	Office of Administrative Hearings	PO Box 64620 St. Paul, MN 55101	Electronic Service	No	OFF_SL_14-579_OFF_SL_14-579_AA-14-579
Leann	Oehlerking Boes	lboes@mnpower.com	Minnesota Power	30 W Superior St Duluth, MN 55802	Electronic Service	No	OFF_SL_14-579_OFF_SL_14-579_AA-14-579
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_14-579_OFF_SL_14-579_AA-14-579
Christine	Schwartz	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_14-579_OFF_SL_14-579_AA-14-579
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_14-579_OFF_SL_14-579_AA-14-579
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_14-579_OFF_SL_14-579_AA-14-579
Robyn	Woeste	robynwoeste@alliantenergy.com	Interstate Power and Light Company	200 First St SE Cedar Rapids, IA 52401	Electronic Service	No	OFF_SL_14-579_OFF_SL_14-579_AA-14-579

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Jason	Bonnett	jason.bonnett@state.mn.us	Public Utilities Commission	121 East 7th Place suite 350 St. Paul, MN 55101	Electronic Service	No	OFF_SL_16-523_AA16-523
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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_16-523_AA16-523
Richard	Dornfeld	Richard.Dornfeld@ag.state.mn.us	Office of the Attorney General-DOC	Minnesota Attorney General's Office 445 Minnesota Street, Suite 1800 Saint Paul, MN 55101	Electronic Service	No	OFF_SL_16-523_AA16-523
Tara	Duginske	tara.r.duginske@xcelenergy.com	Northern States Power Company dba Xcel Energy	414 Nicollet Mall, 401-08 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_16-523_AA16-523
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_16-523_AA16-523
Matthew B	Harris	matt.b.harris@xcelenergy.com	XCEL ENERGY	401 Nicollet Mall FL 8 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_16-523_AA16-523
Adam	Heinen	aheinen@dakotaelectric.com	Dakota Electric Association	4300 220th St W Farmington, MN 55024	Electronic Service	No	OFF_SL_16-523_AA16-523
Katherine	Hinderlie	katherine.hinderlie@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota St Suite 1400 St. Paul, MN 55101-2134	Electronic Service	No	OFF_SL_16-523_AA16-523

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Greg	Merz	greg.merz@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	No	OFF_SL_16-523_AA16-523
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_16-523_AA16-523
Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP	33 South Sixth St Ste 4200 Minneapolis, MN 55402	Electronic Service	Yes	OFF_SL_16-523_AA16-523
Travis	Murray	travis.murray@ag.state.mn.us	Office of the Attorney General-RUD	445 Minnesota St Ste 1400 Saint Paul, MN 55101	Electronic Service	No	OFF_SL_16-523_AA16-523
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_16-523_AA16-523
Ann	O'Reilly	ann.oreilly@state.mn.us	Office of Administrative Hearings	PO Box 64620 St. Paul, MN 55101	Electronic Service	No	OFF_SL_16-523_AA16-523
Leann	Oehlerking Boes	lboes@mnpower.com	Minnesota Power	30 W Superior St Duluth, MN 55802	Electronic Service	No	OFF_SL_16-523_AA16-523
Catherine	Phillips	Catherine.Phillips@wecenergygroup.com	Minnesota Energy Resources	231 West Michigan St Milwaukee, WI 53203	Electronic Service	No	OFF_SL_16-523_AA16-523

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_16-523_AA16-523
Peter	Scholtz	peter.scholtz@ag.state.mn.us	Office of the Attorney General-RUD	Suite 1400 445 Minnesota Street St. Paul, MN 55101-2131	Electronic Service	No	OFF_SL_16-523_AA16-523
Christine	Schwartz	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_16-523_AA16-523
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_16-523_AA16-523
Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates	7400 Lyndale Ave S Ste 190 Richfield, MN 55423	Electronic Service	Yes	OFF_SL_16-523_AA16-523
Richard	Stasik	richard.stasik@wecenergygroup.com	Minnesota Energy Resources Corporation (HOLDING)	231 West Michigan St - P321 Milwaukee, WI 53203	Electronic Service	No	OFF_SL_16-523_AA16-523
Lauren	Steinhaeuser	lauren.steinhaeuser@xcelenergy.com	Northern States Power Company dba Xcel Energy	414 Nicollet Mall, 401-08 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_16-523_AA16-523
Eric	Swanson	eswanson@winthrop.com	Winthrop & Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_16-523_AA16-523
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_16-523_AA16-523

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_16-523_AA16-523

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Jorge	Alonso	jorge.alonso@state.mn.us	Public Utilities Commission	121 7th Place East Suite 350 St. Paul, MN 55101	Electronic Service	No	OFF_SL_17-492_OFF_SL_17-492_AA-17-492
Derek	Bertsch	derek.bertsch@mrenergy.com	Missouri River Energy Services	3724 West Avera Drive PO Box 88920 Sioux Falls, SD 57109-8920	Electronic Service	No	OFF_SL_17-492_OFF_SL_17-492_AA-17-492
Jason	Bonnett	jason.bonnett@state.mn.us	Public Utilities Commission	121 East 7th Place suite 350 St. Paul, MN 55101	Electronic Service	No	OFF_SL_17-492_OFF_SL_17-492_AA-17-492
Christopher J.	Cerny	ccerny@winthrop.com	Winthrop & Weinstine, P.A.	225 South Sixth Street Suite 3500 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_17-492_OFF_SL_17-492_AA-17-492
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_17-492_OFF_SL_17-492_AA-17-492
Richard	Dornfeld	Richard.Dornfeld@ag.state.mn.us	Office of the Attorney General-DOC	Minnesota Attorney General's Office 445 Minnesota Street, Suite 1800 Saint Paul, MN 55101	Electronic Service	No	OFF_SL_17-492_OFF_SL_17-492_AA-17-492
Tara	Duginske	tara.r.duginske@xcelenergy.com	Northern States Power Company dba Xcel Energy	414 Nicollet Mall, 401-08 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_17-492_OFF_SL_17-492_AA-17-492
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_17-492_OFF_SL_17-492_AA-17-492
Matthew B	Harris	matt.b.harris@xcelenergy.com	XCEL ENERGY	401 Nicollet Mall FL 8 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_17-492_OFF_SL_17-492_AA-17-492
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Amber	Lee	amber.lee@stoel.com	Stoel Rives LLP	33 S. 6th Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_17-492_OFF_SL_17-492_AA-17-492
Greg	Merz	greg.merz@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	No	OFF_SL_17-492_OFF_SL_17-492_AA-17-492
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_17-492_OFF_SL_17-492_AA-17-492
Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP	33 South Sixth St Ste 4200 Minneapolis, MN 55402	Electronic Service	Yes	OFF_SL_17-492_OFF_SL_17-492_AA-17-492
Travis	Murray	travis.murray@ag.state.mn.us	Office of the Attorney General-RUD	445 Minnesota St Ste 1400 Saint Paul, MN 55101	Electronic Service	No	OFF_SL_17-492_OFF_SL_17-492_AA-17-492
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_17-492_OFF_SL_17-492_AA-17-492
Ann	O'Reilly	ann.oreilly@state.mn.us	Office of Administrative Hearings	PO Box 64620 St. Paul, MN 55101	Electronic Service	No	OFF_SL_17-492_OFF_SL_17-492_AA-17-492
Leann	Oehlerking Boes	lboes@mnpower.com	Minnesota Power	30 W Superior St Duluth, MN 55802	Electronic Service	No	OFF_SL_17-492_OFF_SL_17-492_AA-17-492

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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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_17-492_OFF_SL_17-492_AA-17-492
Isabel	Ricker	ricker@fresh-energy.org	Fresh Energy	408 Saint Peter Street Suite 220 Saint Paul, MN 55102	Electronic Service	No	OFF_SL_17-492_OFF_SL_17-492_AA-17-492
Peter	Scholtz	peter.scholtz@ag.state.mn.us	Office of the Attorney General-RUD	Suite 1400 445 Minnesota Street St. Paul, MN 55101-2131	Electronic Service	No	OFF_SL_17-492_OFF_SL_17-492_AA-17-492
Christine	Schwartz	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_17-492_OFF_SL_17-492_AA-17-492
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_17-492_OFF_SL_17-492_AA-17-492
Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates	7400 Lyndale Ave S Ste 190 Richfield, MN 55423	Electronic Service	Yes	OFF_SL_17-492_OFF_SL_17-492_AA-17-492
Richard	Stasik	richard.stasik@wecenergygroup.com	Minnesota Energy Resources Corporation (HOLDING)	231 West Michigan St - P321 Milwaukee, WI 53203	Electronic Service	No	OFF_SL_17-492_OFF_SL_17-492_AA-17-492
Kristin	Stastny	kstastny@taftlaw.com	Taft Stettinius & Hollister LLP	2200 IDS Center 80 South 8th St Minneapolis, MN 55402	Electronic Service	No	OFF_SL_17-492_OFF_SL_17-492_AA-17-492

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Eric	Swanson	eswanson@winthrop.com	Winthrop & Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_17-492_OFF_SL_17-492_AA-17-492
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_17-492_OFF_SL_17-492_AA-17-492
Robyn	Woeste	robynwoeste@alliantenergy.com	Interstate Power and Light Company	200 First St SE Cedar Rapids, IA 52401	Electronic Service	No	OFF_SL_17-492_OFF_SL_17-492_AA-17-492

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Derek	Bertsch	derek.bertsch@mrenergy.com	Missouri River Energy Services	3724 West Avera Drive PO Box 88920 Sioux Falls, SD 57109-8920	Electronic Service	No	OFF_SL_18-373_AA -18-373
Jason	Bonnett	jason.bonnett@state.mn.us	Public Utilities Commission	121 East 7th Place suite 350 St. Paul, MN 55101	Electronic Service	No	OFF_SL_18-373_AA -18-373
Christopher J.	Cerny	ccerny@winthrop.com	Winthrop & Weinstine, P.A.	225 South Sixth Street Suite 3500 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_18-373_AA -18-373
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_18-373_AA -18-373
Richard	Dornfeld	Richard.Dornfeld@ag.state.mn.us	Office of the Attorney General-DOC	Minnesota Attorney General's Office 445 Minnesota Street, Suite 1800 Saint Paul, MN 55101	Electronic Service	No	OFF_SL_18-373_AA -18-373
Tara	Duginske	tara.r.duginske@xcelenergy.com	Northern States Power Company dba Xcel Energy	414 Nicollet Mall, 401-08 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_18-373_AA -18-373
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 551012198	Electronic Service	No	OFF_SL_18-373_AA -18-373
Matthew B	Harris	matt.b.harris@xcelenergy.com	XCEL ENERGY	401 Nicollet Mall FL 8 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_18-373_AA -18-373
Adam	Heinen	aheinen@dakotaelectric.com	Dakota Electric Association	4300 220th St W Farmington, MN 55024	Electronic Service	No	OFF_SL_18-373_AA -18-373

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Katherine	Hinderlie	katherine.hinderlie@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota St Suite 1400 St. Paul, MN 55101-2134	Electronic Service	No	OFF_SL_18-373_AA -18-373
Amber	Lee	amber.lee@stoel.com	Stoel Rives LLP	33 S. 6th Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_18-373_AA -18-373
Greg	Merz	greg.merz@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	No	OFF_SL_18-373_AA -18-373
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_18-373_AA -18-373
Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP	33 South Sixth St Ste 4200 Minneapolis, MN 55402	Electronic Service	Yes	OFF_SL_18-373_AA -18-373
Travis	Murray	travis.murray@ag.state.mn.us	Office of the Attorney General-RUD	445 Minnesota St Ste 1400 Saint Paul, MN 55101	Electronic Service	No	OFF_SL_18-373_AA -18-373
Samantha	Norris	samanthanorris@alliantenergy.com	Interstate Power and Light Company	200 1st Street SE PO Box 351 Cedar Rapids, IA 524060351	Electronic Service	No	OFF_SL_18-373_AA -18-373
Ann	O'Reilly	ann.oreilly@state.mn.us	Office of Administrative Hearings	PO Box 64620 St. Paul, MN 55101	Electronic Service	No	OFF_SL_18-373_AA -18-373
Leann	Oehlerking Boes	lboes@mnpower.com	Minnesota Power	30 W Superior St Duluth, MN 55802	Electronic Service	No	OFF_SL_18-373_AA -18-373

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Catherine	Phillips	Catherine.Phillips@wecenergygroup.com	Minnesota Energy Resources	231 West Michigan St Milwaukee, WI 53203	Electronic Service	No	OFF_SL_18-373_AA -18-373
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_18-373_AA -18-373
Isabel	Ricker	ricker@fresh-energy.org	Fresh Energy	408 Saint Peter Street Suite 220 Saint Paul, MN 55102	Electronic Service	No	OFF_SL_18-373_AA -18-373
Peter	Scholtz	peter.scholtz@ag.state.mn.us	Office of the Attorney General-RUD	Suite 1400 445 Minnesota Street St. Paul, MN 55101-2131	Electronic Service	No	OFF_SL_18-373_AA -18-373
Christine	Schwartz	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_18-373_AA -18-373
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th PI E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_18-373_AA -18-373
Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates	7400 Lyndale Ave S Ste 190 Richfield, MN 55423	Electronic Service	Yes	OFF_SL_18-373_AA -18-373
Richard	Stasik	richard.stasik@wecenergygroup.com	Minnesota Energy Resources Corporation (HOLDING)	231 West Michigan St - P321 Milwaukee, WI 53203	Electronic Service	No	OFF_SL_18-373_AA -18-373
Kristin	Stastny	kstastny@taftlaw.com	Taft Stettinius & Hollister LLP	2200 IDS Center 80 South 8th St Minneapolis, MN 55402	Electronic Service	No	OFF_SL_18-373_AA -18-373

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Eric	Swanson	eswanson@winthrop.com	Winthrop & Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_18-373_AA -18-373
Stuart	Tommerdahl	stommerdahl@otpc.com	Otter Tail Power Company	215 S Cascade St PO Box 496 Fergus Falls, MN 56537	Electronic Service	No	OFF_SL_18-373_AA -18-373
Robyn	Woeste	robynwoeste@alliantenergy.com	Interstate Power and Light Company	200 First St SE Cedar Rapids, IA 52401	Electronic Service	No	OFF_SL_18-373_AA -18-373