



414 Nicollet Mall
Minneapolis, MN 55401

July 1, 2025

—Via Electronic Filing—

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

RE: REPLY COMMENTS
IN THE MATTER OF A COMMISSION INQUIRY INTO XCEL ENERGY'S ADVANCED
RATE DESIGN FOR LOAD MANAGEMENT
DOCKET NO. E002/CI-24-115

Dear Mr. Seuffert:

Northern States Power Company, doing business as Xcel Energy, submits our Reply Comments in Docket No. E002/CI-24-115 to the Minnesota Public Utilities Commission in response to comments from the Citizens Utility Board of Minnesota and the Chan Lab at the University of Minnesota Center for Science, Technology, and Environmental Policy (CUB/Chan Lab), the Minnesota Department of Commerce (Department), Minnesota Office of the Attorney General – Residential Utilities Division (OAG-RUD), and Fresh Energy pursuant to the Minnesota Public Utilities Commission's (Commission) March 17, 2025, Notice of Comment Period.

We have electronically filed this document with the Minnesota Public Utilities Commission, and copies have been served on the parties on the attached service list. Please contact Jemar Lee at jemar.w.lee@xcelenergy.com or me at nicholas.f.martin@xcelenergy.com or (612) 330-6255 if you have any questions regarding this filing.

Sincerely,

/s/

NICK MARTIN
DIRECTOR, STRATEGY OUTREACH & ADVOCACY

Enclosure
cc: Service List

STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION

Katie J. Sieben	Chair
Hwikwon Ham	Commissioner
Audrey C. Partridge	Commissioner
Joseph K. Sullivan	Commissioner
John A. Tuma	Commissioner

IN THE MATTER OF A COMMISSION
INQUIRY INTO XCEL ENERGY'S
ADVANCED RATE DESIGN FOR LOAD
MANAGEMENT

DOCKET NO. E002/CI-24-115

REPLY COMMENTS

INTRODUCTION

Northern States Power Company, doing business as Xcel Energy, submits these Reply Comments to the Minnesota Public Utilities Commission in response to comments from the Citizens Utility Board of Minnesota and the Chan Lab at the University of Minnesota Center for Science, Technology, and Environmental Policy (CUB/Chan Lab), the Minnesota Department of Commerce (Department), Minnesota Office of the Attorney General – Residential Utilities Division (OAG-RUD), and Fresh Energy.

COMMENTS

Since there is significant overlap in the parties' initial comments, we organize our reply by topic rather than by party.

A. Context for the Study and Data Request

In comments filed over the past several months, some important context has arguably been lost that may aid in the Commission's decisions in this docket. We provide brief context here to frame the Company's positions.

The idea of a Minnesota customer segmentation study replicating the CUB Illinois study was raised in the Commission's Order approving the Automatic Bill Credit Pilot. There, the Commission "authorize(d) the Executive Secretary to issue a Notice of Comment Period in Docket No. E002/CI-24-115 on whether Xcel should perform a study evaluating the contribution to Minnesota

system costs caused by residential customers with different usage profiles. The comment period may consider segmenting Xcel’s residential customers into groups based on usage profile, consulting the Citizen’s Utility Board Illinois study as an example.”¹

Worth noting is that the Commission could have ordered such a study outright, but instead chose to request comment on *whether* a study was warranted. In addition, the Commission inquired whether *the Company* should perform a study – not whether the Company should provide anonymized CEUD for another party to perform it. The Commission issued this Notice on March 17, 2025.²

CUB reached out to the Company in early 2025 – prior to the March 17 Notice – to discuss plans for this study. We indicated we were awaiting the Notice and were not yet sure what position we would take. We said we found the Illinois study interesting, and are not opposed to replicating it, but were not sure this was warranted. Specifically, if a Minnesota study reached similar findings to the Illinois study, we believed one of the primary policy implications would be that low-income customers with flatter and more flexible usage might benefit from residential Time of Use (TOU) rates – and we already had a proposal for residential TOU rates before the Commission. As such, our position was that it made sense to wait, both for the Notice and for the Commission’s decision on our residential TOU proposal. (The Commission has since approved our residential TOU proposal.³) We also told CUB that if the Commission should order the Company to conduct a study, we would be open to collaborating with CUB and the University of Minnesota on it.

CUB and the Chan Lab dismissed our offer of collaboration, instead forging ahead with their February 13, 2025 Data Request and their plans to conduct a study on their own. This was disappointing, in particular after the Company had expressly stated that, should the Commission order us to replicate the CUB Illinois study, we “would then consider whether we want to do it in-house or

¹ Order Point 15 of the Commission’s December 5, 2024 ORDER APPROVING AUTOMATIC BILL CREDIT PILOT PROGRAM AS MODIFIED. *In the Matter of Xcel Energy’s Petition for an Automatic Bill Credit Pilot Program*. Docket No. E002/M-24-173.

² March 17, 2025 Notice of Comment Period *In the Matter of Commission Inquiry into Xcel Energy’s Advanced Rate Design for Load Management*. Docket No. E002/CI-24-115.

³ The Commission approved the Company’s proposal for an opt-in residential TOU rate at its March 6, 2025 agenda meeting and subsequently issued its May 5, 2017 ORDER APPROVING REVISED OPT-IN PROPOSAL AND SETTING REPORTING REQUIREMENTS *In the Matter of the Petition of Xcel Energy for Approval of a Residential Time of Use Rate Design*. Docket No. E002/M-23-524.

collaborate with you [i.e., CUB and the Chan Lab] and/or other parties on it.”⁴ We further noted that the Notice “may result in guidance from the Commission on study goals, approach and methodology. As such, we prefer to await the outcome of that comment period prior to any agreement on this request... We would of course be willing to revisit your request at a later date, as the information and standards around securing anonymized data evolve, and as we know the results of the forthcoming comment period.”⁵

Taken as a whole, the Company has been collaborative and transparent throughout our communications in this docket. CUB’s increasingly adversarial and non-transparent stance has been disappointing to us, particularly because in other dockets we have been working closely with CUB to advocate for measures to make energy more affordable to our customers, reduce energy burden, reduce disconnections, and improve service quality. CUB’s March 5, 2025 Complaint and June 20, 2025 Comments took a still more adversarial tone, seeming more interested in triangulating the Company’s statements, misrepresenting our intent, and ascribing to us positions we have not taken, than in good-faith collaboration. We hope for and would welcome a return to the spirit of collaborating to design equitable energy solutions.

B. Is a Study Similar to the CUB Illinois One Needed?

The Company reviewed the findings of the CUB Illinois study⁶ in our April 16, 2025 Comments. That study found that in ComEd’s Chicago service territory, lower and generally flatter electricity usage profiles tend to be associated with younger, more urban, and lower-income customers, and peakier load profiles more associated with older, exurban, higher-income customers. Low-income customers of ComEd were significantly more likely to exhibit lower overall usage and flatter load shapes. See in particular Figure 1 of our Comments,

⁴ Company’s February 21, 2025 e-mail response on the February 13, 2025 Data Request, provided as Attachment B to the March 5, 2025 Complaint of CUB Minnesota and the University of Minnesota *In the Matter of a Commission Inquiry into Xcel Energy’s Advanced Rate Design for Load Management* (Docket No. E-002/CI-24- 115) and *In the Matter of a Petition by the Citizens Utility Board of Minnesota to Adopt Open Data Access Standards* (Docket No. E,G-999/M-19-505). Note that the words “and/or other parties” in our response were simply meant to acknowledge that the Commission might expect us to conduct a Request for Proposals for study partners.

⁵ *Ibid.*

⁶ Zethmayr and Singh Makhija, *Six unique load shapes: A segmentation analysis of Illinois residential electricity consumers*, The Electricity Journal, Volume 32, Issue 9, November 2019, available at: <https://www.citizensutilityboard.org/wp-content/uploads/2019/06/ClusterAnalysisFinal.pdf>.

reproduced from the CUB Illinois study.⁷

The Company argued in those Comments that if a study for the Company's Minnesota electric service territory were to reach similar conclusions as the Illinois study, the most obvious policy implication would be the need for residential TOU rates, enabling customers who use less electricity, have flatter usage, and/or are able to shift usage to off-peak periods to save money on their electric bills. Such rates might in particular benefit some of (not necessarily all of) the Company's low-income customers. However, opt-in TOU rates have now been approved by the Commission and will soon be available to any Minnesota residential customer.⁸ Since the new rate is opt-in, we asserted that customer outreach and education to ensure low-income (and non-low-income) customers understand the new option, and can easily enroll if it is likely to benefit them, would be a better use of resources than a lengthy and expensive study to justify a rate option the Commission has already approved.⁹

CUB/Chan Lab, the Department and Fresh Energy all appear to have understood our Comments to suggest we think the Company's 2020-2022 Residential TOU Pilot makes a new study redundant. This was not our intent. CUB/Chan Lab say the Company "claims the results of its time-of-use (TOU) pilot are equivalent to what would be discovered through customer segmentation: that low-income customers . . . have generally lower and flatter usage profiles than customers overall," and note that the Residential TOU Pilot was limited to 17,500 customers in only two parts of the Company's service territory.¹⁰ The Department and Fresh Energy similarly interpreted our Comments to suggest the Residential TOU Pilot makes replicating the CUB Illinois study duplicative.^{11,12} Since all three parties read our comments this way, we accept that we were unclear and apologize for creating confusion. While our

⁷ Northern States Power Company, doing business as Xcel Energy. April 16, 2025 Comments *In the Matter of Commission Inquiry into Xcel Energy's Advanced Rate Design for Load Management*. Docket No. E002/CI-24-115. Pages 3-4.

⁸ May 5, 2017 ORDER APPROVING REVISED OPT-IN PROPOSAL AND SETTING REPORTING REQUIREMENTS *In the Matter of the Petition of Xcel Energy for Approval of a Residential Time of Use Rate Design*. Docket No. E002/M-23-524.

⁹ Company's April 16 Comments at 6-7.

¹⁰ June 20, 2025 Comments of the Citizens Utility Board of Minnesota and the Chan Lab *In the Matter of Commission Inquiry into Xcel Energy's Advanced Rate Design for Load Management*. Docket No. E002/CI-24-115. Pages 6-7.

¹¹ June 20, 2025 Comments of the Minnesota Department of Commerce *In the Matter of Commission Inquiry into Xcel Energy's Advanced Rate Design for Load Management*. Docket No. E002/CI-24-115. Pages 5-6.

¹² June 20, 2025 Comments of Fresh Energy *In the Matter of Commission Inquiry into Xcel Energy's Advanced Rate Design for Load Management*. Docket No. E002/CI-24-115. Pages 2-3.

Residential TOU Rate Pilot was large for a pilot, and instructive about the potential benefit of TOU rates to low-income customers, it was certainly not a service territory-wide customer segmentation study.

To clarify, the Company did not mean to suggest that the Residential TOU Rate Pilot itself makes replicating the CUB Illinois study redundant. Rather, the existence of an approved TOU *rate* arguably makes the study redundant. Why expend the resources, and undertake the customer data risk, for a study whose results would only put us right where we are? None of the other parties have answered that question. CUB/Chan Lab have not suggested any other specific potential policy outcome (i.e., rate design) of their proposed study.¹³ Indeed, CUB/Chan Lab even seem to acknowledge the same likely outcome identified by the Company when they say “if the study confirms that low-income customers generally have lower on-peak usage, that evidence could be used to encourage households to enroll in TOU rates as a more affordable way of meeting their energy needs.”¹⁴

CUB/Chan Lab also assert the Company claimed our existing Low-Income Low-Usage (LILU) rate and Automatic Bill Credit (ABC) pilot are sufficient to address the issue of cross-subsidization.¹⁵ The Company made no such claim; this is the first of several instances we will note of CUB attributing to the Company positions we have not taken. The LILU rate is designed to provide a rate discount and improve affordability for certain low-income customers who also exhibit low usage, while also facilitating enrollment by allowing self-attestation of eligibility. The ABC Pilot is designed to experiment with and carefully evaluate a new means of reducing energy burden for customers in Census Block Groups with high electric energy burden, without requiring income documentation or other enrollment actions by the customer. The Company did not suggest there is cross-subsidization in our residential class or propose either the LILU rate or ABC Pilot as a response to cross-subsidization.

In sum, none of the parties have provided support for expending the costs and resources, and incurring risks to customer privacy, that would be required to enable three universities to conduct a study whose primary finding is likely to be the need for a rate option that already exists. As a result, the Company does not think a study similar to the CUB Illinois study is needed at this time. Rather,

¹³ At most, the commenting parties allude vaguely to the potential for other rate design options to emerge from a customer segmentation study, but none suggest any specific rate options. See Department Comments at 7, OAG-RUD Comments at 8-9, Fresh Energy Comments at 3.

¹⁴ CUB/Chan Lab Comments at 7.

¹⁵ CUB/Chan Lab Comments at 7.

customer education and awareness programs are more straightforward means to encouraging households to enroll in TOU rates.

C. Rationale for Denial of the Data Request

CUB/Chan Lab assert the Company has proposed a “blanket rejection” of all requests for aggregated or anonymized ODAS.¹⁶ This is the second instance of CUB attributing to the Company positions we have not taken. The Department seems to share this concern, asserting that “the outcome of this case may determine whether the ODAS provides a meaningful framework for external analysis or whether utilities will continue to have wide discretion to withhold anonymized data even when the standards are met.”¹⁷ CUB/Chan Lab also assert that the Company claimed the existence of any related docketed proceeding would be grounds for rejecting any request for anonymized CEUD¹⁸ – a third instance of attributing to us positions our Comments did not suggest. The Company’s April 16 Comments took no position on CEUD requests in general, nor suggested that we would deny any request in which there is a related docketed proceeding. We declined the University’s Data Request for reasons specific to that request, as discussed above.

We did, however, highlight a concern the Company has consistently stated in the ODAS docket, and which remains unaddressed. We believe there is a risk to customer privacy and potential for re-identification if the Company shares anonymized CEUD externally. We stated that:

The Open Data Access Standards allow but do not require utilities to provide anonymized CEUD. Section III.C. states, “Notwithstanding section III.B, a utility may refuse to provide aggregated or anonymized CEUD when it reasonably believes the data release would create a security risk for the utility, its customer(s), or the public, or that the release would allow the third party to re-identify customers, violate the terms of the contract in 2(v) above, or otherwise use the data in violation of these standards.” We take our responsibility to secure and protect our customers’ data very seriously and, to date, we have been very clear that we would decline to provide anonymized CEUD until an objective basis has been established to address the risk of customer re-identification from anonymized CEUD. Commission Orders in

¹⁶ CUB/Chan Lab Comments at 4. See also June 20, 2025 Comments of the Office of Attorney General – Residential Utilities Division *In the Matter of Commission Inquiry into Xcel Energy’s Advanced Rate Design for Load Management*. Docket No. E002/CI-24-115. Page 8.

¹⁷ Department Comments at 4.

¹⁸ CUB/Chan Lab Comments at 3.

*E,G-999/M-19-505 have supported that position. On that basis, we have thus far not fulfilled any requests for anonymized CEUD in Minnesota due to the risk that release would allow a third party to re-identify customers or create a security risk for the utility, its customers, or the public, resulting in disclosure of sensitive information that the Commission has tasked utilities with protecting. We decline this request on that basis as well.*¹⁹

The Department appears to agree in principle, stating that “although the data sought in this proceeding is anonymized, Xcel’s concerns about the potential for re-identification, particularly when interval-level usage data is combined with external datasets, are legitimate.”²⁰ But the Department ultimately finds the customer privacy protections in the ODAS – the 15/15 rule, geographic aggregation, and non-disclosure agreements with requesting parties – to be adequate to mitigate these risks.²¹ As we have stated, there is no record in any proceeding that would allow us to agree that that is known to be true.

We made clear, however, that our concern is not specific to the three universities; neither CUB nor these universities have given the Company any reason to suspect they intend not to protect customer privacy.²² In addition, we granted that the three professors making the Data Request – as “researchers affiliated with a college or university accredited by a national or regional accrediting agency recognized by the U.S. Secretary of Education” – are authorized CEUD requesters under the ODAS Section III.B(2)(iv)(d).²³ We agree with OAG-RUD on these points and have not suggested otherwise.²⁴

That said, risks to customer privacy cannot be eliminated when CEUD leaves the Company. The ODAS allow utilities to make an assessment of risk, including weighing potential benefits of the data release against risks. OAG-RUD acknowledges this: “the Standards were created for the purpose of balancing customer privacy interests and the public interest in using anonymized data for research and study.”²⁵ Here, since the Commission has already approved a residential TOU rate, we believe the potential public interest benefits are minimal, and do not outweigh the risks. That is an assessment specific to this Data Request, not a blanket position.

¹⁹ March 5 Complaint, *Attachment B*.

²⁰ Department Comments at 6.

²¹ Department Comments at 6.

²² Company’s April 16, 2025 Comments at 12.

²³ July 5, 2024 Order at 13.

²⁴ OAG-RUD Comments at 4-5.

²⁵ OAG-RUD Comments at 7-8.

We also pointed out in our Comments that the Commission, in its 2024 revisions to the ODAS, made extensive redlines to many sections but chose to make no revisions to Section III.C except to correct a typo:

b. Modify existing Section III.C:

Notwithstanding section III.B, a utility may refuse to provide aggregated or anonymized CEUD when it reasonably believes the data release would create a security risk for the utility, its customer(s), or ~~that~~ the public, or that the release would allow the third party to re-identify customers, violate the terms of the contract in 2(v) above, or otherwise use the data in violation of these standards.²⁶

Had the Commission wanted to remove or limit utilities' ability to deny CEUD requests, we believe they would have revised Section III.C. They did not; in fact, they instead emphasized that "if a utility determines that all these protections [the 15/15 anonymization screen, geographic boundaries on anonymized CEUD requests, and non-disclosure agreements] are inadequate, the utility may refuse individual data requests pursuant to Section III.C in the Standards."²⁷

The Commission may determine there are instances where the value of providing anonymized CEUD to an outside party is sufficient to outweigh customer privacy risks. We believe this is not such a case. The imbalance of risk to reward is particularly apparent here, since the need for replicating the CUB Illinois study is at best an open question, and – if the Commission decides such a study is warranted despite having already approved a residential TOU rate – the March 17 Notice suggests the Company might itself be ordered to undertake the study, which would make sharing CEUD externally unnecessary.

Finally, we note that even where there is no intent to do so – and we are fully confident there is no intent to do so in this Data Request – the risk of accidental disclosures remains. A recent example is the case of Scott Hempling, CUB's expert witness in Docket No. E-015/PA-24-198. Mr. Hempling by his own admission inadvertently shared Highly Confidential Trade Secret (HCTS) information in that docket on his public website and on LinkedIn; with two colleagues who "share an interest in the subject" but did not have HCTS access; with three assistants, one of whom e-mailed a HCTS document to FedEx for printing; and with an Executive Director who had not signed an NDA. These

²⁶ July 5, 2024 Order at 13.

²⁷ July 5, 2024 Order at 5.

details are documented in Mr. Hempling's March 3, 2025 Letter.²⁸ The sharing of HCTS information was unintentional – attributable to a file labeling error – and Mr. Hempling took several actions to attempt to recall the shared documents and limit distribution of the material. Of course, there is no way to know how broadly information that has been posted on a public website and on LinkedIn, even if briefly, may have been distributed. We raise this example not to suggest ill intent by any of the parties involved, only to flag that accidental breaches can happen even when protections are in place, and therefore the balancing of risks and benefits is essential.

D. Rationale for a Data Access Fee

CUB/Chan Lab and other parties object to the Company's proposal to charge a data access fee under ODAS Section VI.A if the Commission orders the Company to fulfill the Data Request. They also object to our preliminary estimate of the actual costs to fulfill this request. CUB/Chan Lab and Fresh Energy both provide examples of lower fees charged by other utilities.²⁹ CUB/Chan Lab ultimately propose that the Commission either disallow the fee or impose a cap of \$1,300 (double the amount of ComEd's fee for providing data to public interest researchers). CUB/Chan Lab and Fresh Energy also propose that the legal costs included in our estimate be disallowed.³⁰

First and foremost, the fee is specifically allowed under ODAS Section VI.A. Disallowing the fee would directly contradict the standards in place and recently affirmed by the Commission.

Second, as to the actual calculation of the fee, we acknowledge that the ODAS Section VI.A is potentially challenging to implement as written, since it requires the data access fee to be based on "actual costs incurred by the utility to create and deliver the requested data," but also requires the utility to "collect the fee before preparing or supplying the requested data."³¹ It is not obvious how a utility could collect a fee representing actual costs in advance of preparing data, since the costs to prepare and deliver CEUD would be known only at the conclusion of work. If the Commission orders the Company to fulfill the Data Request, we would propose to comply with ODAS Section VI by collecting an initial deposit of half of the estimated costs before beginning work, then

²⁸ March 3, 2025 Letter from Scott Hempling, Attorney at Law, in MPUC Docket No. E-015/PA-24-198 and OAH Docket No. 25-2500-40339.

²⁹ CUB/Chan Lab Comments at 12; Fresh Energy Comments at 4-5.

³⁰ CUB/Chan Lab Comments at 12; Fresh Energy Comments at 5.

³¹ ODAS Section IV.A(1) and (4).

tracking actual costs and collecting the remainder of the data access fee at the end of the process or refunding over-collected costs, just before supplying the CEUD to the requester. We are of course open to Commission guidance on these mechanics.

In providing our cost estimates, both via e-mail and in response to CUB's Information Request No. 2, the Company was explicit that we were making our best estimate of the costs – primarily staff time – to fulfill the Data Request. We explained the Request would require the Company's Data Analytics team to compile, apply the 15/15 standard to, and anonymize at least 19.3 billion individual data points, and likely more.³² It would then require the Company's Geospatial Analysis team to geographically identify this very large amount of CEUD by Census Block Group. Finally, it would require our Legal team to draft, negotiate and execute Non-Disclosure Agreements (NDAs) with three universities.

We also noted these estimates are preliminary. The staff time required to perform these tasks is quite difficult to estimate, since the Company has never before fulfilled a Data Request of this nature and magnitude under the Minnesota ODAS. Should the actual costs prove to be lower (higher), we indicated the Company would charge a lower (higher) fee:

Subject to refinement as this Docket and the Company's understanding of the work required to fill the February 13, 2025 Data Request (Data Request) evolves, we here attempt to provide our current estimate of those costs... As required by ODAS, the Data Access Fee will be based on actual costs incurred to create and deliver the requested data, which could be more or less than these estimates.³³

CUB/Chan Lab's comparison to other utilities' fees, and proposal for an arbitrary cap on the data access fee at double ComEd's fees, are not relevant to the current docket. These have no relation to Xcel Energy's actual costs to create and deliver anonymized CEUD. In fact, denying data access fees or setting them at another utility's fee would violate the ODAS, which requires those fees to be based on "actual costs incurred to create and deliver the

³² A conservative estimate based on 1.1 million AMI meters deployed as of the request, and 12 months of 30-minute interval data. With full AMI deployment, and more than 12 months of data for many AMI meters, the number would be higher.

³³ Company response to CUB Information Request No. 2.

requested data.”³⁴ Notably, CUB/Chan Lab, who elsewhere argue for a strict reading of the ODAS, seem to toss it aside that portion of the ODAS that they do not prefer.

Finally, CUB/Chan Lab propose that the legal portion of our data access fee be disallowed. They assert that legal costs are “beyond the permissible scope of recovery under ODAS. Pursuant to Section VI.A(1) of the Standards, data access fees must be based on the ‘actual costs incurred by the utility to create and deliver the requested data.’ By its plain language, this provision contemplates potential expenses associated with compiling and anonymizing data but does not include legal fees.”³⁵

There is no basis for this interpretation. Just like other types of staff time, Legal staff time to draft and negotiate non-disclosure agreements with CEUD requesters represents “actual costs incurred by the utility to ... deliver the requested data” because delivering the requested data *requires* NDAs to protect customer privacy. The ODAS Section III.B(2)(v) and (vi) describe detailed and prescriptive requirements for such NDAs, including that they must prohibit the third party from attempting to reverse engineer data or reidentify customers; require the third party to disclose all of the third party’s employees, subcontractors, or agents with access to the data set at the time of the contract and require this to be updated if it changes during the life of the contract; prohibit the third party from disclosing anonymized data except to the third party’s personnel or to entities with whom the third party has a contractual relationship for the purpose of conducting an investigation with the anonymized data; hold the third party responsible for its actions with the data; require the third party to promptly delete data and notify the utility if it discovers any Personally Identifiable Information contained in the data set; require the third party to state its intended use for the data; and require deletion of anonymized CEUD after specified timeframes.³⁶

In addition, the Commission in its July 5, 2024 Order amended the ODAS to prohibit requesters from disclosing CEUD to any other individuals unless those individuals have themselves executed a NDA with the utility.³⁷ In the context of

³⁴ ODAS Section IV.A(1). CUB’s proposal would be supportable if Section IV.A(1) were to read, “A utility charging a data access fee authorized by this section must base the fee amount on the actual costs incurred by the utility to create and deliver the requested data, *or half the fee charged by an unrelated utility in an unrelated jurisdiction.*” It does not.

³⁵ CUB/Chan Lab Comments at 11.

³⁶ ODAS Section III.B(2), (v) and (vi).

³⁷ July 5, 2024 Order at 13.

the Data Request, this means the Company would need to negotiate NDAs not only with the University of Minnesota, but also with Carnegie Mellon University, the University of Maryland, and any other parties with whom the universities may subsequently propose to share the anonymized CEUD. The Commission recognized that this change “...requires individuals and entities outside of the requesting third party’s control to sign an NDA with the utility rather than the third party,” and noted that “to the extent that this results in increased costs for the utilities, the Commission notes that the *utilities can charge a reasonable fee* for providing CEUD pursuant to Section VI in the Standards.”³⁸ So the Commission explicitly recognized that executing NDAs entails additional actual costs, which are primarily Legal staff time.

Negotiating NDAs including all the required elements in ODAS Section III.B(2)(v) and (vi) may entail a significant amount of Legal staff time. The Company’s hope is that a similar NDA can be used with each party, but that may not prove possible. The counterparties to these NDAs would be universities, who have their own legal requirements. The two out-of-state universities, assuming their legal teams may currently be unfamiliar with Minnesota’s customer privacy rules and the ODAS, may be especially risk-averse, requiring significant time for back-and-forth. With no way of knowing in advance how much of the Company lawyers’ time will be required, we estimated that portion of our costs at \$20,000. Again, however, if less Legal staff time is required than we have assumed, we would propose to track hours and only charge for actual costs, consistent with the ODAS Section VI.A(1).

Finally, the ODAS require the utility to “consider the reasonable value of the data prepared to the utility and, if appropriate, reduce the fee assessed to the requesting person.”³⁹ In this instance we see negligible value to the Company or our customers, since the Commission has already approved a residential TOU rate, so we would not propose to reduce the data access fee. The primary value of receiving this data appears to be the researchers themselves, who intend to use it for academic publications. The Company does not question the value of such publications, but we do not believe the cost of producing them should be borne by our customers. Ironically, CUB/Chan Lab maintain that the Commission should not require the Company to undertake the study in question ourselves because this “would result in unnecessary ratepayer costs and burden to the utility”⁴⁰ – but do not seem to extend their concern about

³⁸ July 5, 2024 Order at 6 (emphasis added).

³⁹ ODAS Section IV.A(2).

⁴⁰ CUB/Chan Lab Comments at 5.

ratepayer costs and burden to the utility to their own Data Request. They ask the Commission to prevent the Company from protecting our customers from these costs by recovering them through a data access fee.

To summarize, the ODAS Section VI.A explicitly authorizes utilities to charge requesters a data access fee, which must represent the actual costs incurred by the utility to create and deliver the requested data. The ODAS make no distinction between actual costs of data analysts and geospatial analysts to compile and anonymize data, and actual costs of lawyers to negotiate the required NDAs; these are all necessary costs to fulfill a CEUD request and deliver the requested data while protecting customer privacy. The fees charged by other utilities in other states, whether higher or lower, have no bearing, since they do not represent the actual costs of Xcel Energy to fulfill the Data Request. The Company believes its position on this issue is in full compliance with the ODAS and reasonable given the above-acknowledged challenges.

E. Other issues

1. Timing of study/data release

The Company has taken the position that if the Commission does order a study along the lines of the CUB Illinois one – either by the Company, or by granting the Data Request – then the appropriate timing would be when a year of interval data is available following full deployment of AMI in Minnesota. With 12 months of data currently available for less than 65 percent of the Company’s Minnesota residential customers, and considering the non-random nature of AMI deployment, we believe any study conducted now would not represent the Company’s full customer base and hence may not be a strong basis for any policy recommendations that might emerge from it.⁴¹

The Department appears to support this recommendation. While they recommend the Commission grant the Data Request, they also recommend that if the Commission directs the Company to conduct a study, “the Department agrees with Xcel that the study should begin after AMI deployment is complete to ensure that full-year interval data is available across the residential customer class.”⁴² While the Department does not take an explicit position on the timing of the Chan Lab’s proposed study, it makes sense that the same logic – benefiting from a full year of interval data – would apply regardless who

⁴¹ Company’s Comments at 7.

⁴² Department Comments at 8.

conducts the study.

2. Timeline for fulfilling Data Request

In response to an information request from CUB, the Company estimated the time required for each step in fulfilling the Data Request. We estimated 8-10 weeks for Step 1 (compiling and anonymizing 19.3 billion or more pieces of 30-minute AMI interval data), 5-6 weeks for Step 2 (identifying the compiled data by Census Block Group), and described Step 3 (drafting and negotiating NDAs with the three universities), though we did not attempt to estimate a timeframe for this step.⁴³ In response, CUB/Chan Lab recommends that the Commission order the Company to deliver the requested CEUD no later than 16 weeks from the Commission's Order in this docket.⁴⁴

We believe this timeline is feasible – with the caveat that we cannot anticipate what challenges may arise in NDA negotiation. While Steps 1 and 2 are necessarily sequential, Step 3 could proceed in parallel and hence may be able to be completed in 16 weeks. The Company will make our best efforts in this regard, but cannot dictate the time the NDA counterparties may require to become comfortable and sign on their side. Per the ODAS, we would not release any CEUD until NDAs are signed with all three universities. Hence if the Commission adopts this CUB/Chan Lab recommendation, we would propose amending it to read:

Require Xcel to provide the Chan Lab with the requested data in a timely manner, not to exceed the later of 16 weeks from the date of this Order, or the date when all three universities mentioned in the Data Request have signed non-disclosure agreements compliant with ODAS Section III.B(2)(v) and (vi).

3. Guidance on study methodology, contents and goals

The Notice asks, “If the Commission orders such a study, what guidance on the methodology, contents, and goals should it provide?” If the objective is largely to replicate the CUB Illinois study, we believe that study provides a sufficient description of its methods to guide our efforts. If the Commission prefers a study different in scope, methods or goals, the Company would benefit from additional guidance from the Commission. Regarding study scope,

⁴³ Company's response to CUB Information Request No. 2.

⁴⁴ CUB/Chan Lab Comments at 12-13.

the CUB Illinois study focused on residential customers, with customer segmentation by income, other demographic variables, and location of residence. Guidance would be useful if the Commission would like a Minnesota study to include other customer classes, or other types of customer segmentation. Regarding study goals, the CUB Illinois study presents findings but stops short of policy prescriptions or rate design recommendations. Commission guidance would be useful whether a Minnesota study should make policy recommendations or simply present findings and leave the discussion of policy implications to occur elsewhere in the record.⁴⁵

The Department notes it is “developing a proposed methodology and will offer more specific recommendations in its reply comments.”⁴⁶ We look forward to reviewing those recommendations. Other parties did not address this question in the Notice.

CONCLUSION

For the reasons given above, Xcel Energy continues to believe a study similar to the CUB Illinois one, whether conducted by the Company or others, is not necessary at this time. If the Commission disagrees and orders the Company to fulfill the Data Request and/or conduct a study, we will of course do so. Between those two options, we would prefer to conduct the study in-house, since that option avoids risks to customer privacy. If the Commission prefers for the universities to conduct the study, and hence orders the Company to fulfill the Data Request, we would charge a data access fee per ODAS Section VI.A.

The Company has taken no position in this docket on requests for CEUD in general. We have for now declined to fulfill the Chan Lab’s Data Request, due to the specifics of that request, the significant costs and limited benefits we believe the proposed study would have for our customers.

Dated: July 1, 2025

Northern States Power Company

⁴⁵ Company’s April 16, 2025 Comments at 13-14.

⁴⁶ Department Comments at 8.

CERTIFICATE OF SERVICE

I, Joshua DePauw, hereby certify that I have on this day served copies of the foregoing document on the attached list of persons.

xx by depositing a true and correct copy thereof, properly enveloped
with postage paid in the United States mail at Minneapolis, Minnesota

xx electronic filing

DOCKET No. E002/CI-24-115

Dated this 1st day of July 2025

/s/

Joshua DePauw
Regulatory Administrator

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
1	Leland P.	Abide	leland.abide@kutakrock.com	Kutak Rock LLP		60 S 6th St Ste 3400 Minneapolis MN, 55402 United States	Electronic Service		No	24-115Official
2	Karen	Achberger	krach@stolaf.edu			101 Saint Olaf Ave Unit 414 Northfield MN, 55057 United States	Electronic Service		No	24-115Official
3	Michael	Ahern	ahern.michael@dorsey.com	Dorsey & Whitney, LLP		50 S 6th St Ste 1500 Minneapolis MN, 55402-1498 United States	Electronic Service		No	24-115Official
4	Michael	Allen	michael.allen@allenergysolar.com	All Energy Solar		721 W 26th st Suite 211 Minneapolis MN, 55405 United States	Electronic Service		No	24-115Official
5	Michael	Alvarez	michael.alvarez@longroadenergy.com	Community Wind North, LLC		c/o Longroad Development Company, LLC 330 Congress Street, 6th Fl Boston MA, 02210 United States	Electronic Service		No	24-115Official
6	Gary	Ambach	gambach@slipstreaminc.org	Slipstream, Inc.		8973 SW Village Loop Chanhassen MN, 55317 United States	Electronic Service		No	24-115Official
7	Ellen	Anderson	ellena@umn.edu	325 Learning and Environmental Sciences		1954 Buford Ave Saint Paul MN, 55108 United States	Electronic Service		No	24-115Official
8	Jay	Anderson	jaya@cmpas.org	CMPAS		7550 Corporate Way Suite 100 Eden Prairie MN, 55344 United States	Electronic Service		No	24-115Official
9	Kristine	Anderson	kanderson@greatermngas.com	Greater Minnesota Gas, Inc.		1900 Cardinal Lane PO Box 798 Faribault MN, 55021 United States	Electronic Service		No	24-115Official
10	MK	Anderson	anderson@fresh-energy.org	Fresh Energy		408 St Peter Street Saint Paul MN, 55102 United States	Electronic Service		No	24-115Official
11	Susan	Arntz	sarntz@mankatomn.gov	City Of Mankato		P.O. Box 3368 Mankato MN, 56002-3368 United States	Electronic Service		No	24-115Official
12	Mara	Ascheman	mara.k.ascheman@xcelenergy.com	Xcel Energy		414 Nicollet Mall Fl 5 Minneapolis MN, 55401 United States	Electronic Service		No	24-115Official
13	Thomas	Ashley	tom@greenlots.com	Greenlots		null null, null United States	Electronic Service		No	24-115Official
14	Donna	Attanasio	dattanasio@gwu.edu	George Washington University		2000 H Street NW Washington DC, 20052 United States	Electronic Service		No	24-115Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
52	George	Crocker	gwillc@nawo.org	North American Water Office		5093 Keats Avenue Lake Elmo MN, 55042 United States	Electronic Service		No	24-115Official
53	Leigh	Currie	lcurrie@mncenter.org	Minnesota Center for Environmental Advocacy		1919 University Ave W Ste 515 St. Paul MN, 55104 United States	Electronic Service		No	24-115Official
54	Lauren	Davis	lauren.davis@atlaspolicy.com	Atlas Public Policy		515 Q Street NW Unit 2 Washington DC, 20001 United States	Electronic Service		No	24-115Official
55	Matthew	Deal	matthew.deal@chargepoint.com	ChargePoint, Inc.		254 Hacienda Ave Campbell CA, 95008 United States	Electronic Service		No	24-115Official
56	Timothy	DenHerder Thomas	timothy@cooperativeenergyfutures.com	Cooperative Energy Futures		3500 Bloomington Ave. S Minneapolis MN, 55407 United States	Electronic Service		No	24-115Official
57	James	Denniston	james.r.denniston@xcelenergy.com	Xcel Energy Services, Inc.		414 Nicollet Mall, 401-8 Minneapolis MN, 55401 United States	Electronic Service		No	24-115Official
58	Carrie	Desmond	carrie.desmond@metrotransit.org	Metropolitan Council		560 6th Avenue North Minneapolis MN, 55411 United States	Electronic Service		No	24-115Official
59	Curt	Dieren	curt.dieren@dgr.com	L&O Power Cooperative		1302 S Union St Rock Rapids IA, 51246 United States	Electronic Service		No	24-115Official
60	Ian M.	Dobson	ian.m.dobson@xcelenergy.com	Xcel Energy		414 Nicollet Mall, 401-8 Minneapolis MN, 55401 United States	Electronic Service		No	24-115Official
61	Bridget	Dockter	bridget.dockter@xcelenergy.com			null null, null United States	Electronic Service		No	24-115Official
62	Carlton	Doyle Fontaine	carlton.doyle.fontaine@senate.mn	MN Senate		75 Rev Dr Martin Luther King Jr Blvd Room G-17 St Paul MN, 55155 United States	Electronic Service		No	24-115Official
63	J.	Drake Hamilton	hamilton@fresh-energy.org	Fresh Energy		408 St Peter St Ste 350 Saint Paul MN, 55101 United States	Electronic Service		No	24-115Official
64	Michelle	Dreier	mdreier@electricalassociation.com			null null, null United States	Electronic Service		No	24-115Official
65	Christopher	Droske	christopher.droske@minneapolismn.gov	Northern States Power Company dba Xcel Energy-Elec		661 5th Ave N Minneapolis MN, 55405 United States	Electronic Service		No	24-115Official
66	Brian	Edstrom	briane@cubminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota St Ste W1360 Saint Paul MN, 55101 United States	Electronic Service		No	24-115Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
67	William	Ehrlich	wehrlich@tesla.com	Tesla, Inc.		3500 Deer Creek Rd Palo Alto CA, 94304 United States	Electronic Service		No	24-115Official
68	Kristen	Eide Tollefson	healingsystems69@gmail.com	R-CURE		28477 N Lake Ave Frontenac MN, 55026-1044 United States	Electronic Service		No	24-115Official
69	Rebecca	Eilers	rebecca.d.eilers@xcelenergy.com	Xcel Energy		414 Nicollet Mall - 401 7th Floor Minneapolis MN, 55401 United States	Electronic Service		No	24-115Official
70	Bob	Eleff	bob.eleff@house.mn	Regulated Industries Cmte		100 Rev Dr Martin Luther King Jr Blvd Room 600 St. Paul MN, 55155 United States	Electronic Service		No	24-115Official
71	Ron	Elwood	relwood@mnlisap.org	Legal Services Advocacy Project		970 Raymond Avenue Suite G-40 Saint Paul MN, 55114 United States	Electronic Service		No	24-115Official
72	Betsy	Engelking	betsy@nationalgridrenewables.com	National Grid Renewables		8400 Normandale Lake Blvd Ste 1200 Bloomington MN, 55437 United States	Electronic Service		No	24-115Official
73	John	Farrell	jfarrell@ilsr.org	Institute for Local Self-Reliance		2720 E. 22nd St Institute for Local Self-Reliance Minneapolis MN, 55406 United States	Electronic Service		No	24-115Official
74	Eric	Fehlhaber	efehlhaber@dakotaelectric.com	Dakota Electric Association		4300 220th St W Farmington MN, 55024 United States	Electronic Service		No	24-115Official
75	Sharon	Ferguson	sharon.ferguson@state.mn.us		Department of Commerce	85 7th Place E Ste 280 Saint Paul MN, 55101-2198 United States	Electronic Service		No	24-115Official
76	Mike	Fiterman	mikefiterman@libertydiversified.com	Liberty Diversified International		5600 N Highway 169 Minneapolis MN, 55428-3096 United States	Electronic Service		No	24-115Official
77	David A.	Fitzgerald	daf@dvclaw.com	Davison Van Cleve		2321 Fairview Ave E #3 Seattle WA, 98102 United States	Electronic Service		No	24-115Official
78	Lucas	Franco	lfranco@liunagroc.com	LIUNA		81 Little Canada Rd E Little Canada MN, 55117 United States	Electronic Service		No	24-115Official
79	Nathan	Franzen	nathan@nationalgridrenewables.com	Geronimo Energy, LLC		8400 Normandale Lake Blvd Ste 1200 Bloomington	Electronic Service		No	24-115Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						MN, 55437 United States				
80	Daryll	Fuentes	energy@usg.com	USG Corporation		550 W Adams St Chicago IL, 60661 United States	Electronic Service		No	24-115Official
81	James	Garness	james.r.garness@xcelenergy.com			null null, null United States	Electronic Service		No	24-115Official
82	Patti	Gartland	pgartland@greaterstcloud.com	Greater St. Cloud Development Corp.		501 West St Germain St Ste 100 St. Cloud MN, 56301 United States	Electronic Service		No	24-115Official
83	Edward	Garvey	garveyed@aol.com	Residence		32 Lawton St Saint Paul MN, 55102 United States	Electronic Service		No	24-115Official
84	Allen	Gleckner	gleckner@fresh-energy.org	Fresh Energy		408 St. Peter Street Ste 350 Saint Paul MN, 55102 United States	Electronic Service		No	24-115Official
85	Allen	Gleckner	agleckner@elpc.org	Environmental Law & Policy Center		35 E. Wacker Drive, Suite 1600 Suite 1600 Chicago IL, 60601 United States	Electronic Service		No	24-115Official
86	Jenny	Glumack	jenny@mrea.org	Minnesota Rural Electric Association		11640 73rd Ave N Maple Grove MN, 55369 United States	Electronic Service		No	24-115Official
87	Anita	Grace	anita@gracemulticultural.com	GRACE Multictural		12959 196th LN NW Elk River MN, 55330 United States	Electronic Service		No	24-115Official
88	Ryan	Granholm	ryan.granholm@afslaw.com	ArentFox Schiff LLP		233 S Wacker Dr. Ste. 7100 Chicago IL, 60647 United States	Electronic Service		No	24-115Official
89	Todd J.	Guerrero	todd.guerrero@kutakrock.com	Kutak Rock LLP		Suite 1750 220 South Sixth Street Minneapolis MN, 55402-1425 United States	Electronic Service		No	24-115Official
90	Natalie	Haberman	townsend@fresh-energy.org	Fresh Energy		408 St Peter St # 350 St. Paul MN, 55102 United States	Electronic Service		No	24-115Official
91	Joe	Halso	joe.halso@sierraclub.org	Sierra Club		1536 Wynkoop St Ste 200 Denver CO, 80202 United States	Electronic Service		No	24-115Official
92	Katherine	Hamilton	katherine@aem-alliance.org	Advanced Energy Management Alliance		1701 Rhode Island Ave, NW Washington DC, 20036 United States	Electronic Service		No	24-115Official
93	Jason G.	Harp	jason.harp@afslaw.com	ArentFox Schiff LLP		233 S Wacker Dr Ste 7100 Chicago IL,	Electronic Service		No	24-115Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						60606 United States				
94	Matthew B	Harris	matt.b.harris@xcelenergy.com	XCEL ENERGY		401 Nicollet Mall FL 8 Minneapolis MN, 55401 United States	Electronic Service		No	24-115Official
95	Shubha	Harris	shubha.m.harris@xcelenergy.com	Xcel Energy		414 Nicollet Mall, 401 - FL 8 Minneapolis MN, 55401 United States	Electronic Service		No	24-115Official
96	Erik	Hatlestad	erik@cureriver.org			117 1st St Montevideo MN, 56265 United States	Electronic Service		No	24-115Official
97	Kim	Havey	kim.havey@minneapolismn.gov	City of Minneapolis		350 South 5th Street, Suite 315M Minneapolis MN, 55415 United States	Electronic Service		No	24-115Official
98	Philip	Hayet	phayet@jkenn.com	J. Kennedy and Associates, Inc.		570 Colonial Park Drive Suite 305 Roswell GA, 30075-3770 United States	Electronic Service		No	24-115Official
99	Todd	Headlee	theadlee@dvigridsolutions.com	Dominion Voltage, Inc.		701 E. Cary Street Richmond VA, 23219 United States	Electronic Service		No	24-115Official
100	Amber	Hedlund	amber.r.hedlund@xcelenergy.com	Northern States Power Company dba Xcel Energy-Elec		414 Nicollet Mall, 401-7 Minneapolis MN, 55401 United States	Electronic Service		No	24-115Official
101	Adam	Heinen	aheinen@dakotaelectric.com	Dakota Electric Association		4300 220th St W Farmington MN, 55024 United States	Electronic Service		No	24-115Official
102	Annete	Henkel	mui@mnuilityinvestors.org	Minnesota Utility Investors		413 Wacouta Street #230 St.Paul MN, 55101 United States	Electronic Service		No	24-115Official
103	Jessy	Hennesy	jessy.hennesy@avantenergy.com	Avant Energy		220 S. Sixth St. Ste 1300 Minneapolis MN, 55402 United States	Electronic Service		No	24-115Official
104	Sandra	Henry	sandra.henry@elevatenp.org	Elevate		322 S Green St Ste 300 Chicago IL, 60607 United States	Electronic Service		No	24-115Official
105	Katherine	Hinderlie	katherine.hinderlie@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	445 Minnesota St Suite 1400 St. Paul MN, 55101-2134 United States	Electronic Service		Yes	24-115Official
106	Corey	Hintz	chintz@dakotaelectric.com	Dakota Electric Association		4300 220th Street Farmington MN, 55024-9583 United States	Electronic Service		No	24-115Official
107	Joe	Hoffman	ja.hoffman@smmpa.org	SMMPA		500 First Ave SW Rochester MN, 55902-	Electronic Service		No	24-115Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						3303 United States				
108	Michael	Hoppe	lu23@ibew23.org	Local Union 23, I.B.E.W.		445 Etna Street Ste. 61 St. Paul MN, 55106 United States	Electronic Service		No	24-115Official
109	MJ	Horner	mj.horner@xcelenergy.com			null null, null United States	Electronic Service		No	24-115Official
110	Samantha	Houston	shouston@ucsusa.org	Union of Concerned Scientists		1825 K St. NW Ste 800 Washington DC, 20006 United States	Electronic Service		No	24-115Official
111	Lori	Hoyum	lhoyum@mnpower.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	24-115Official
112	Jan	Hubbard	jan.hubbard@comcast.net			7730 Mississippi Lane Brooklyn Park MN, 55444 United States	Electronic Service		No	24-115Official
113	Holmes	Hummel	holmes.hummel@cleanenergyworks.org	Clean Energy Works		925 French St NW Washington DC, 20001 United States	Electronic Service		No	24-115Official
114	Geoffrey	Inge	ginge@regintl.com	Regulatory Intelligence LLC		PO Box 270636 Superior CO, 80027-9998 United States	Electronic Service		No	24-115Official
115	Casey	Jacobson	cjacobson@bepc.com	Basin Electric Power Cooperative		1717 East Interstate Avenue Bismarck ND, 58501 United States	Electronic Service		No	24-115Official
116	Travis	Jacobson	travis.jacobson@mdu.com	Great Plains Natural Gas Company		400 N 4th St Bismarck ND, 58501 United States	Electronic Service		No	24-115Official
117	John S.	Jaffray	jjaffray@jjrpower.com	JJR Power		350 Highway 7 Suite 236 Excelsior MN, 55331 United States	Electronic Service		No	24-115Official
118	Alan	Jenkins	aj@jenkinsatlaw.com	Jenkins at Law		2950 Yellowtail Ave. Marathon FL, 33050 United States	Electronic Service		No	24-115Official
119	Andrea	Jenkins	andrea.jenkins@minneapolismn.gov	Minneapolis City of Lakes		350 S 5th St Room 307 Minneapolis MN, 55415 United States	Electronic Service		No	24-115Official
120	Richard	Johnson	rick.johnson@lawmoss.com	Moss & Barnett		150 S. 5th Street Suite 1200 Minneapolis MN, 55402 United States	Electronic Service		No	24-115Official
121	Sarah	Johnson Phillips	sphillips@stoel.com	Stoel Rives LLP		33 South Sixth Street Suite 4200 Minneapolis MN, 55402 United States	Electronic Service		No	24-115Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
135	Brian	Krambeer	bkrambeer@mienergy.coop	MiEnergy Cooperative		PO Box 626 31110 Cooperative Way Rushford MN, 55971 United States	Electronic Service		No	24-115Official
136	Michael	Krause	michaelkrause61@yahoo.com			1200 Plymouth Avenue Minneapolis MN, 55411 United States	Electronic Service		No	24-115Official
137	Michael	Krikava	mkrikava@taftlaw.com	Taft Stettinius & Hollister LLP		2200 IDS Center 80 S 8th St Minneapolis MN, 55402 United States	Electronic Service		No	24-115Official
138	Nicolle	Kupser	nkupser@greatermngas.com	Greater Minnesota Gas, Inc.		1900 Cardinal Ln PO Box 798 Faribault MN, 55021 United States	Electronic Service		No	24-115Official
139	Matthew	Lacey	mlacey@greenergy.com	Great River Energy		12300 Elm Creek Boulevard Maple Grove MN, 55369-4718 United States	Electronic Service		No	24-115Official
140	Mary	LaGarde	mlagarde@maicnet.org	Minneapolis American Indian Center		1530 E Franklin Ave Minneapolis MN, 55404 United States	Electronic Service		No	24-115Official
141	Holly	Lahd	holly.lahd@target.com	Target Corporation		33 South 6th St CC-28662 Minneapolis MN, 55402 United States	Electronic Service		No	24-115Official
142	Carmel	Laney	carmel.laney@stoel.com	Stoel Rives LLP		33 South Sixth Street Suite 4200 Minneapolis MN, 55402 United States	Electronic Service		No	24-115Official
143	James D.	Larson	james.larson@avantenergy.com	Avant Energy Services		220 S 6th St Ste 1300 Minneapolis MN, 55402 United States	Electronic Service		No	24-115Official
144	Peder	Larson	plarson@larkinhoffman.com	Larkin Hoffman Daly & Lindgren, Ltd.		8300 Norman Center Drive Suite 1000 Bloomington MN, 55437 United States	Electronic Service		No	24-115Official
145	Kevin	Lee	klee@bluegreenalliance.org	BlueGreen Alliance		2701 University Ave SE Ste. 209 Minneapolis MN, 55414 United States	Electronic Service		No	24-115Official
146	Dean	Leischow	dean@sunrisenrg.com	Sunrise Energy Ventures		315 Manitoba Ave Ste 200 Wayzata MN, 55391 United States	Electronic Service		No	24-115Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
147	Annie	Levenson Falk	annielf@cubminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota Street, Suite W1360 St. Paul MN, 55101 United States	Electronic Service		No	24-115Official
148	Ryan	Long	ryan.j.long@xcelenergy.com			414 Nicollet Mall 401 8th Floor Minneapolis MN, 55401 United States	Electronic Service		No	24-115Official
149	Jason	Loos	jason.loos@centerpointenergy.com	CenterPoint Energy Resources Corp.		505 Nicollet Mall 3rd Floor Minneapolis MN, 55402 United States	Electronic Service		No	24-115Official
150	Susan	Ludwig	sludwig@mnpower.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	24-115Official
151	Alice	Madden	alice@communitypowermn.org	Community Power		2720 E 22nd St Minneapolis MN, 55406 United States	Electronic Service		No	24-115Official
152	Kavita	Maini	kmaini@wi.rr.com	KM Energy Consulting, LLC		961 N Lost Woods Rd Oconomowoc WI, 53066 United States	Electronic Service		No	24-115Official
153	Emily	Marshall	emarshall@lourismarshall.com	Miller O'Brien Jensen, PA		120 S. 6th Street Suite 2400 Minneapolis MN, 55402 United States	Electronic Service		No	24-115Official
154	Katherine	Marshall	katie.marshall@lawmoss.com	Moss & Barnett		150 S 5th St Ste 1200 Minneapolis MN, 55402 United States	Electronic Service		No	24-115Official
155	Mary	Martinka	mary.a.martinka@xcelenergy.com	Xcel Energy Inc		414 Nicollet Mall 7th Floor Minneapolis MN, 55401 United States	Electronic Service		No	24-115Official
156	Gregg	Mast	gmast@cleanenergyeconomymn.org	Clean Energy Economy Minnesota		4808 10th Avenue S Minneapolis MN, 55417 United States	Electronic Service		No	24-115Official
157	Daryl	Maxwell	dmaxwell@hydro.mb.ca	Manitoba Hydro		360 Portage Ave FL 16 PO Box 815, Station Main Winnipeg MB, R3C 2P4 Canada	Electronic Service		No	24-115Official
158	Lilly B.	McKenna	lilly.mckenna@stoel.com	Stoel Rives LLP		One Montgomery St Ste 3230 San Francisco CA, 94104 United States	Electronic Service		No	24-115Official
159	Taylor	McNair	taylor@gridlab.org			668 Capp Street San Francisco CA, 94110 United States	Electronic Service		No	24-115Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
160	Sally Anne	McShane	sally.anne.mcshane@state.mn.us		Public Utilities Commission	121 7th Place E Suite 350 St. Paul MN, 55101 United States	Electronic Service		No	24-115Official
161	Stephen	Melchionne	stephen.melchionne@ag.state.mn.us		Office of the Attorney General - Department of Commerce	445 Minnesota Street, Ste. 1400 St. Paul MN, 55101 United States	Electronic Service		Yes	24-115Official
162	Thomas	Melone	thomas.melone@allcous.com	Minnesota Go Solar LLC		222 South 9th Street Suite 1600 Minneapolis MN, 55120 United States	Electronic Service		No	24-115Official
163	Peder	Mewis	pmewis@cleangridalliance.org	Clean Grid Alliance		570 Asbury St. St. Paul MN, 55104 United States	Electronic Service		No	24-115Official
164	Joseph	Meyer	joseph.meyer@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	Bremer Tower, Suite 1400 445 Minnesota Street St Paul MN, 55101-2131 United States	Electronic Service		No	24-115Official
165	Kevin	Miller	kevin.miller@chargepoint.com			254 E. Hacienda Avenue Campbell CA, 95008 United States	Electronic Service		No	24-115Official
166	Stacy	Miller	stacy.miller@minneapolismn.gov	City of Minneapolis		350 S. 5th Street Room M 301 Minneapolis MN, 55415 United States	Electronic Service		No	24-115Official
167	David	Moeller	dmoeller@allte.com	Minnesota Power			Electronic Service		No	24-115Official
168	Marc	Monbouquette	marc.monbouquette@enel.com	Enel X North America, Inc.		846 Bransten Rd San Carlos CA, 94070 United States	Electronic Service		No	24-115Official
169	Dalene	Monsebroten	dalene.monsebroten@nmpagency.com	Northern Municipal Power Agency		123 2nd St W Thief River Falls MN, 56701 United States	Electronic Service		No	24-115Official
170	Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP		33 South Sixth St Ste 4200 Minneapolis MN, 55402 United States	Electronic Service		No	24-115Official
171	Evan	Mulholland	emulholland@mncenter.org	Minnesota Center for Environmental Advocacy		1919 University Ave W Ste 515 Saint Paul MN, 55101 United States	Electronic Service		No	24-115Official
172	Alan	Muller	alan@greendel.org	Energy & Environmental Consulting		1110 West Avenue Red Wing MN, 55066 United States	Electronic Service		No	24-115Official
173	Kristin	Munsch	kmunsch@citizensutilityboard.org	Citizens Utility Board of Minnesota		309 W. Washington St. Ste. 800	Electronic Service		No	24-115Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						Chicago IL, 60606 United States				
174	Travis	Murray	travis.murray@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	445 Minnesota St Ste 1400 Saint Paul MN, 55101 United States	Electronic Service		Yes	24-115Official
175	Amanda	Myers	amanda@weavegrid.com	Weave Grid, Inc.		222 7th Street 2nd Floor San Francisco CA, 94103 United States	Electronic Service		No	24-115Official
176	Mark	Nabong	mnabong@nrdc.org	Natural Resources Defense Council		20 N. Wacker Drive #1600 Chicago IL, 60606 United States	Electronic Service		No	24-115Official
177	Ben	Nelson	benn@cmpasgroup.org	CMPA		459 South Grove Street Blue Earth MN, 56013 United States	Electronic Service		No	24-115Official
178	Carl	Nelson	cnelson@mncee.org	Center for Energy and Environment		212 3rd Ave N Ste 560 Minneapolis MN, 55401 United States	Electronic Service		No	24-115Official
179	David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency		220 South Sixth Street Suite 1300 Minneapolis MN, 55402 United States	Electronic Service		No	24-115Official
180	Sephra	Ninow	sephra.ninow@energycenter.org	Center for Sustainable Energy		426 17th Street, Suite 700 Oakland CA, 94612 United States	Electronic Service		No	24-115Official
181	Michael	Noble	noble@fresh-energy.org	Fresh Energy		408 Saint Peter St Ste 350 Saint Paul MN, 55102 United States	Electronic Service		No	24-115Official
182	Rolf	Nordstrom	rnordstrom@gpsd.net	Great Plains Institute		2801 21ST AVE S STE 220 Minneapolis MN, 55407-1229 United States	Electronic Service		No	24-115Official
183	Samantha	Norris	samanthanorris@alliantenergy.com	Interstate Power and Light Company		200 1st Street SE PO Box 351 Cedar Rapids IA, 52406-0351 United States	Electronic Service		No	24-115Official
184	Christian	Noyce	christian.noyce@state.mn.us		Public Utilities Commission	759 Hague Ave St Paul MN, 55104 United States	Electronic Service		No	24-115Official
185	David	O'Brien	david.obrien@navigant.com	Navigant Consulting		77 South Bedford St Ste 400 Burlington MA, 01803 United States	Electronic Service		No	24-115Official
186	M. William	O'Brien	bobrien@mojlaw.com	Miller O'Brien Jensen, P.A.		120 S 6th St Ste 2400 Minneapolis MN, 55402 United States	Electronic Service		No	24-115Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
187	Ric	O'Connell	ric@gridlab.org	GridLab		2120 University Ave Berkeley CA, 94704 United States	Electronic Service		No	24-115Official
188	Jeff	O'Neill	jeff.oneill@ci.monticello.mn.us	City of Monticello		505 Walnut Street Suite 1 Monticello MN, 55362 United States	Electronic Service		No	24-115Official
189	Matthew	Olsen	molsen@otpc.com	Otter Tail Power Company		215 South Cascade Street Fergus Falls MN, 56537 United States	Electronic Service		No	24-115Official
190	Russell	Olson	rolson@hcpd.com	Heartland Consumers Power District		PO Box 248 Madison SD, 57042-0248 United States	Electronic Service		No	24-115Official
191	Debra	Opatz	dopatz@otpc.com	Otter Tail Power Company		215 South Cascade Street Fergus Falls MN, 56537 United States	Electronic Service		No	24-115Official
192	Nate	O'Reilly	nate@iron512.com			851 Pierce Butler Route St Paul MN, 55104 United States	Electronic Service		No	24-115Official
193	Carol A.	Overland	overland@legalelectric.org	Legalelectric - Overland Law Office		1110 West Avenue Red Wing MN, 55066 United States	Electronic Service		No	24-115Official
194	John	Pacheco	johnpachecojr@gmail.com			null null, null United States	Electronic Service		No	24-115Official
195	Greg	Palmer	gpalmer@greatermngas.com	Greater Minnesota Gas, Inc.		1900 Cardinal Ln PO Box 798 Faribault MN, 55021 United States	Electronic Service		No	24-115Official
196	Jessica	Palmer Denig	jessica.palmer-denig@state.mn.us		Office of Administrative Hearings	600 Robert St N PO Box 64620 St. Paul MN, 55164 United States	Electronic Service		No	24-115Official
197	Dan	Patry	dpatry@sunedison.com	SunEdison		600 Clipper Drive Belmont CA, 94002 United States	Electronic Service		No	24-115Official
198	Jeffrey C	Paulson	jeff.jcplaw@comcast.net	Paulson Law Office, Ltd.		4445 W 77th Street Suite 224 Edina MN, 55435 United States	Electronic Service		No	24-115Official
199	Jose	Perez	jose@hispanicsinenergy.com			1017 L Street #719 Sacramento CA, 95814 United States	Electronic Service		No	24-115Official
200	Jennifer	Peterson	jjpeterson@mnpower.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	24-115Official
201	Catherine	Phillips	catherine.phillips@wecenergygroup.com	Minnesota Energy		231 West Michigan St	Electronic Service		No	24-115Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
215	Susan	Romans	sromans@allete.com	Minnesota Power		30 West Superior Street Legal Dept Duulth MN, 55802 United States	Electronic Service		No	24-115Official
216	Amanda	Rome	amanda.rome@xcelenergy.com	Xcel Energy		414 Nicollet Mall FL 5 Minneapolis MN, 55401 United States	Electronic Service		No	24-115Official
217	Robert K.	Sahr	bsahr@eastriver.coop	East River Electric Power Cooperative		P.O. Box 227 Madison SD, 57042 United States	Electronic Service		No	24-115Official
218	Renee	Samson	rsamson@freewiretech.com	FreeWire Technologies		1999 Harrison St Oakland CA, 94612 United States	Electronic Service		No	24-115Official
219	Joseph L	Sathe	jsathe@kennedy-graven.com	Kennedy & Graven, Chartered		150 S 5th St Ste 700 Minneapolis MN, 55402 United States	Electronic Service		No	24-115Official
220	Tim	Schaefer	thschaef@gmail.com	Environment MN		211 N 1st St Ste 480 Minneapolis MN, 55401 United States	Electronic Service		No	24-115Official
221	Kevin	Schlangen	kevin.schlangen@co.dakota.mn.us	Dakota County		2800 160th Street West Rosemount MN, 55068 United States	Electronic Service		No	24-115Official
222	Jacob J.	Schlesinger	jschlesinger@keyesfox.com	Keyes & Fox LLP		1580 Lincoln St Ste 880 Denver CO, 80203 United States	Electronic Service		No	24-115Official
223	Elizabeth	Schmiesing	eschmiesing@winthrop.com	Winthrop & Weinstine, P.A.		225 South Sixth Street Suite 3500 Minneapolis MN, 55402 United States	Electronic Service		No	24-115Official
224	Peter	Scholtz	peter.scholtz@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	Suite 1400 445 Minnesota Street St. Paul MN, 55101-2131 United States	Electronic Service		Yes	24-115Official
225	Kay	Schraeder	kschraeder@minnkota.com	Minnkota Power		5301 32nd Ave S Grand Forks ND, 58201 United States	Electronic Service		No	24-115Official
226	Lori	Schultz	lorischultz@minncap.org	Minnesota Community Action Partnership		MCIT Building 100 Empire Dr Ste 202 St. Paul MN, 55103 United States	Electronic Service		No	24-115Official
227	Christine	Schwartz	regulatory.records@xcelenergy.com	Xcel Energy		414 Nicollet Mall, MN1180-07-MCA Minneapolis MN, 55401-1993 United States	Electronic Service		No	24-115Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
269	Francesca	Wahl	fwahl@tesla.com	Tesla		3500 Deer Creek Rd Palo Alto CA, 94304 United States	Electronic Service		No	24-115Official
270	Roger	Warehime	roger.warehime@owatonnautilities.com	Owatonna Municipal Public Utilities - Gas		208 S Walnut Ave PO BOX 800 Owatonna MN, 55060 United States	Electronic Service		No	24-115Official
271	Jenna	Warmuth	jwarmuth@mnpower.com	Minnesota Power		30 W Superior St Duluth MN, 55802-2093 United States	Electronic Service		No	24-115Official
272	Darrell	Washington	darrell.washington@state.mn.us		DOT	null null, null United States	Electronic Service		No	24-115Official
273	Laurie	Williams	laurie.williams@sierraclub.org	Sierra Club		Environmental Law Program 1536 Wynkoop St Ste 200 Denver CO, 80202 United States	Electronic Service		No	24-115Official
274	Justin	Wilson	justin.wilson@chargepoint.com	ChargePoint		240 East Hacienda Ave. Campbell CA, 95008 United States	Electronic Service		No	24-115Official
275	Joseph	Windler	jwindler@winthrop.com	Winthrop & Weinstine		225 South Sixth Street, Suite 3500 Minneapolis MN, 55402 United States	Electronic Service		No	24-115Official
276	Robyn	Woeste	robynwoeste@alliantenergy.com	Interstate Power and Light Company		200 First St SE Cedar Rapids IA, 52401 United States	Electronic Service		No	24-115Official
277	Yochi	Zakai	yzakai@smwlaw.com	SHUTE, MIHALY & WEINBERGER LLP		396 Hayes Street San Francisco CA, 94102 United States	Electronic Service		No	24-115Official
278	Alicia	Zaloga	azaloga@keyesfox.com	Keyes & Fox, LLP		1155 Kildaire Farm Rd Ste 202-203 Cary NC, 27511 United States	Electronic Service		No	24-115Official
279	Christopher	Zibart	czibart@atcllc.com	American Transmission Company LLC		W234 N2000 Ridgeview Pkwy Court Waukesha WI, 53188-1022 United States	Electronic Service		No	24-115Official
280	Kurt	Zimmerman	kwz@ibew160.org	Local Union #160, IBEW		2909 Anthony Ln St Anthony Village MN, 55418-3238 United States	Electronic Service		No	24-115Official
281	Patrick	Zomer	pat.zomer@lawmoss.com	Moss & Barnett PA		150 S 5th St #1200 Minneapolis MN, 55402 United States	Electronic Service		No	24-115Official