

BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

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

Chair
Commissioner
Commissioner
Commissioner
Commissioner

In the Matter of a Peak Time Rebate Program
for Northern States Power Co. d/b/a Xcel
Energy to Further the Commission's
Advanced Rate Design Efforts in Docket No.
E-002/CI-24-115

ISSUE DATE: June 5, 2025

DOCKET NO. E-002/M-24-432

ORDER INITIATING COMMENT
PERIOD

PROCEDURAL HISTORY

On March 17, 2025, Northern States Power Co. d/b/a Xcel Energy (Xcel) filed a proposal to replace its existing Energy Action Days behavioral demand response program with a new peak time rebate (PTR) program as part of its Energy Conservation and Optimization (ECO) portfolio.

On April 16, 2025, the following entities filed comments on Xcel's petition:

- The Department of Commerce, Division of Energy Resources (Department);
- The Office of the Attorney General – Residential Utilities Division (OAG); and,
- Xcel.

On May 22, 2025, the Commission met to consider this matter.

FINDINGS AND CONCLUSIONS

I. Petition

Xcel petitioned the Commission for approval to work with the Department to implement and recover costs for a peak time rebate (PTR) program through the Energy Conservation and Optimization (ECO) process.¹ Specifically, Xcel suggested replacing its Energy Action Days program with the PTR program. Notably, Xcel is not asking the Commission to approve the actual PTR program; instead, Xcel is seeking a procedural decision approving Xcel's proposal to bring the PTR program to the Department for implementation via the ECO process. Xcel explained that it considered whether to propose the PTR program directly to the Commission or to the Department and, ultimately, elected to proceed via the Department's ECO

¹ See Minn. Stat. § 216B.241. Separately, Xcel noted that the petition was filed in compliance with a Commission order issued on December 4, 2024, in Docket No. E-002/M-23-467, and a second order—the Notice of and Order for Hearing—issued on December 30, 2024, in Docket No. E-002/GR-24-320.

process because 1) the PTR program qualifies as “load management” under Minn. Stat. § 216B.2402, subd. 15; 2) Xcel’s demand response programs—including Xcel’s current behavioral demand response offering (Energy Action Days)—are implemented via the ECO process; and 3) cost recovery has already been established for ECO programs creating a clear pathway for cost recovery.

Xcel generally explained that the PTR program would ask customers to voluntarily shift load or reduce usage during peak times similar to Energy Action Days. The PTR program differed from Energy Action Days in that the PTR program would add a direct reward or rebate to customers for acting, proportional to their reduced energy use.

II. Comments

The OAG did not support implementing the PTR program through the ECO process. Although the PTR program could be approved by the Department through the ECO process, the OAG contended that the Commission would still have a duty to review the program. Specifically, the OAG argued that the PTR program is a “rate” as defined and used in Minn. Stat. §§ 216B.02 and 216B.03 and, therefore, the Commission must ensure the PTR “rate” is just and reasonable, and meets other statutory factors,² before it is offered to customers. The OAG asserted that ratepayers would therefore be best served by Commission review of the substance of the PTR program in this docket rather than through the Department’s ECO process.

More broadly, the OAG questioned a perceived overlap in authority between the Commission and the Department pertaining to utility offerings that send price signals to change the timing of customers’ energy use—such as time-of-use rates or critical-peak pricing. The OAG suggested that, under Xcel’s reading of the law, these rates could also be implemented via the ECO process under the Department’s authority.

Xcel supported implementing the PTR program through the ECO process, as proposed in the petition, emphasizing that the Commission is not required to separately approve the PTR program because the program is not a rate and will not have a tariff. If the Commission elects to take comments on the merits of the PTR program, Xcel suggested doing so in this docket prior to submitting the PTR program to the Department for review.

The Department supported Xcel’s proposal to implement the PTR program through the ECO process. The Department noted that the ECO process would evaluate the PTR program through stakeholder engagement and a formal comment period. The Department agreed that including the PTR program in Xcel’s ECO portfolio would be consistent with several of Xcel’s demand response programs, assuming the program meets the relevant statutory provisions and guidelines.

III. Commission Action

The comments filed in response to Xcel’s petition have convinced the Commission to substantively review Xcel’s PTR program through a new comment period before a decision can be made about referring the program to the Department to review through the ECO process. Accordingly, the Commission will open a new comment period in this docket to further develop

² See Minn. Stat. §§ 216B.03, 216B.16, subd. 6.

the record regarding the merits of Xcel's PTR program and what method of cost recovery is appropriate.

ORDER

1. The Commission delegates authority to the Executive Secretary to issue a notice of comment period in this docket regarding the merits of Xcel's Peak Time Rebate proposal, and what method of cost recovery is appropriate. The notice for comment shall address topics including, but not limited to, the following:

Merits of the Proposal

- a. Program design and communications plan.
- b. Proposed eligibility rules, including the proposal to exclude current demand response program participants.
- c. The estimated program budget, including third-party vendor expenses.
- d. Ways to increase system benefits that the program can deliver.
- e. Whether Xcel's cost-effectiveness analysis is reasonable considering the recent increases in the Midcontinent Independent System Operator (MISO) capacity auction clearing prices.
- f. Whether there are program design, implementation, and evaluation elements that have proven successful in similar programs, such as Connexus's Peak Time Rebate program, that could be incorporated.

Program Evaluation

- g. Reporting requirements, including how often reporting should occur.
- h. Whether there should be an assessment of the program's performance and scaling opportunities after a certain duration.

Cost Recovery

- i. What method of cost recovery is allowable and appropriate (Xcel's Energy Conservation and Optimization (ECO) portfolio, general rate case, etc.).

2. This order shall become effective immediately.

BY ORDER OF THE COMMISSION



A handwritten signature in blue ink, appearing to read "Will Seuffert".

Will Seuffert
Executive Secretary

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CERTIFICATE OF SERVICE

I, Anne Redmond, hereby certify that I have this day, served a true and correct copy of the following document 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 St. Paul, Minnesota.

Minnesota Public Utilities Commission
ORDER INITIATING COMMENT PERIOD

Docket Number **E-002/M-24-432**

Dated this 5th day of June, 2025

/s/ Anne Redmond

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124	Philip	Jones	phil@philjonesconsulting.com	Alliance for Transportation Electrification		1402 3rd Ave Ste 1315 Seattle WA, 98101 United States	Electronic Service		No	Official 24-432
125	Brendan	Jordan	bjordan@gpisd.net	Great Plains Institute & Bioeconomy Coalition of MN		2801 21st Ave S Ste 220 Minneapolis MN, 55407 United States	Electronic Service		No	Official 24-432
126	Bina	Joshi	bina.joshi@afslaw.com	ArentFox Schiff LLP		233 S Wacker Dr Ste 7100 Chicago IL, 60606 United States	Electronic Service		No	Official 24-432
127	Dan	Juhl	in.another.account.info@juhlenergy.com	Juhl Energy Inc.		1502 17th St SE Pipestone MN, 56164 United States	Paper Service		No	Official 24-432
128	Mahmoud	Kabalan	mahmoud.kabalan@stthomas.edu	University of St Thomas		2115 Summit Ave. Mail OSS100 School of Engineering Saint Paul MN, 55105 United States	Electronic Service		No	Official 24-432
129	Michael	Kampmeyer	mkampmeyer@a-e-group.com	AEG Group, LLC		260 Salem Church Road Sunfish Lake MN, 55118 United States	Electronic Service		No	Official 24-432
130	Nick	Kaneski	nick.kaneski@enbridge.com	Enbridge Energy Company, Inc.		11 East Superior St Ste 125 Duluth MN, 55802 United States	Electronic Service		No	Official 24-432
131	Stacey	Karels	skarels@local563.org	Mankato Area Bldg & Construction Trades Council		310 McKinzie St Mankato MN, 56001 United States	Electronic Service		No	Official 24-432
132	William	Kenworthy	will@votesolar.org			1 South Dearborn St Ste 2000 Chicago IL, 60603 United States	Electronic Service		No	Official 24-432
133	Samuel B.	Ketchum	sketchum@kennedy-graven.com	Kennedy & Graven, Chartered		150 S 5th St Ste 700 Minneapolis MN, 55402 United States	Electronic Service		No	Official 24-432
134	Chris	King	chris_king@siemens.com	Siemens		4000 E. Third Ave Suite 400 Foster City CA, 94404 United States	Electronic Service		No	Official 24-432
135	Frank	Kohlasch	frank.kohlasch@state.mn.us		Minnesota Pollution Control Agency	520 Lafayette Rd N. St. Paul MN, 55155 United States	Electronic Service		No	Official 24-432
136	Brian	Krambeer	bkrambeer@mienergy.coop	MiEnergy Cooperative		PO Box 626 31110	Electronic Service		No	Official 24-432

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						Cooperative Way Rushford MN, 55971 United States				
137	Michael	Krause	michaelkrause61@yahoo.com			1200 Plymouth Avenue Minneapolis MN, 55411 United States	Electronic Service		No	Official 24-432
138	Michael	Krikava	mkrikava@taftlaw.com	Taft Stettinius & Hollister LLP		2200 IDS Center 80 S 8th St Minneapolis MN, 55402 United States	Electronic Service		No	Official 24-432
139	Nicolle	Kupser	nkupser@greatermngas.com	Greater Minnesota Gas, Inc.		1900 Cardinal Ln PO Box 798 Faribault MN, 55021 United States	Electronic Service		No	Official 24-432
140	Matthew	Lacey	mlacey@grenergy.com	Great River Energy		12300 Elm Creek Boulevard Maple Grove MN, 55369-4718 United States	Electronic Service		No	Official 24-432
141	Mary	LaGarde	mlagarde@maicnet.org	Minneapolis American Indian Center		1530 E Franklin Ave Minneapolis MN, 55404 United States	Electronic Service		No	Official 24-432
142	Holly	Lahd	holly.lahd@target.com	Target Corporation		33 South 6th St CC-28662 Minneapolis MN, 55402 United States	Electronic Service		No	Official 24-432
143	Carmel	Laney	carmel.laney@stoel.com	Stoel Rives LLP		33 South Sixth Street Suite 4200 Minneapolis MN, 55402 United States	Electronic Service		No	Official 24-432
144	James D.	Larson	james.larson@avantenergy.com	Avant Energy Services		220 S 6th St Ste 1300 Minneapolis MN, 55402 United States	Electronic Service		No	Official 24-432
145	Peder	Larson	plarson@larkinhoffman.com	Larkin Hoffman Daly & Lindgren, Ltd.		8300 Norman Center Drive Suite 1000 Bloomington MN, 55437 United States	Electronic Service		No	Official 24-432
146	Kevin	Lee	kleee@bluegreenalliance.org	BlueGreen Alliance		2701 University Ave SE Ste. 209 Minneapolis MN, 55414 United States	Electronic Service		No	Official 24-432
147	Dean	Leischow	dean@sunrisenrg.com	Sunrise Energy Ventures		315 Manitoba Ave Ste 200 Wayzata MN, 55391 United States	Electronic Service		No	Official 24-432
148	Annie	Levenson Falk	anniel@cupminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota Street, Suite W1360 St. Paul MN, 55101 United States	Electronic Service		No	Official 24-432

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
162	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		Yes	Official 24-432
163	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	Official 24-432
164	Thomas	Melone	thomas.melone@allcous.com	Minnesota Go Solar LLC		222 South 9th Street Suite 1600 Minneapolis MN, 55120 United States	Electronic Service		No	Official 24-432
165	Greg	Merz	greg.merz@ag.state.mn.us		Office of the Attorney General - Department of Commerce	445 Minnesota Street Suite 1400 St. Paul MN, 55101 United States	Electronic Service		Yes	Official 24-432
166	Peder	Mewis	pmewis@cleangridalliance.org	Clean Grid Alliance		570 Asbury St. St. Paul MN, 55104 United States	Electronic Service		No	Official 24-432
167	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		Yes	Official 24-432
168	Kevin	Miller	kevin.miller@chargepoint.com			254 E. Hacienda Avenue Campbell CA, 95008 United States	Electronic Service		No	Official 24-432
169	Stacy	Miller	stacy.miller@minneapolismn.gov	City of Minneapolis		350 S. 5th Street Room M 301 Minneapolis MN, 55415 United States	Electronic Service		No	Official 24-432
170	David	Moeller	dmoeller@allete.com	Minnesota Power			Electronic Service		No	Official 24-432
171	Marc	Monbouquette	marc.monbouquette@enel.com	Enel X North America, Inc.		846 Bransten Rd San Carlos CA, 94070 United States	Electronic Service		No	Official 24-432
172	Dalene	Monsebroten	dalene.monsebroten@nmpagency.com	Northern Municipal Power Agency		123 2nd St W Thief River Falls MN, 56701 United States	Electronic Service		No	Official 24-432
173	Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP		33 South Sixth St Ste 4200 Minneapolis MN, 55402 United States	Electronic Service		No	Official 24-432
174	Christa	Moseng	christa.moseng@state.mn.us		Office of Administrative Hearings	P.O. Box 64620 Saint Paul MN, 55164-0620 United States	Electronic Service		Yes	Official 24-432

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
175	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	Official 24-432
176	Alan	Muller	alan@greendel.org	Energy & Environmental Consulting		1110 West Avenue Red Wing MN, 55066 United States	Electronic Service		No	Official 24-432
177	Kristin	Munsch	kmunsch@citizensutilityboard.org	Citizens Utility Board of Minnesota		309 W. Washington St. Ste. 800 Chicago IL, 60606 United States	Electronic Service		No	Official 24-432
178	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	Official 24-432
179	Amanda	Myers	amanda@weavegrid.com	Weave Grid, Inc.		222 7th Street 2nd Floor San Francisco CA, 94103 United States	Electronic Service		No	Official 24-432
180	Mark	Nabong	mnabong@nrdc.org	Natural Resources Defense Council		20 N. Wacker Drive #1600 Chicago IL, 60606 United States	Electronic Service		No	Official 24-432
181	Ben	Nelson	benn@cmpasgroup.org	CMMPA		459 South Grove Street Blue Earth MN, 56013 United States	Electronic Service		No	Official 24-432
182	Carl	Nelson	cnelson@mncee.org	Center for Energy and Environment		212 3rd Ave N Ste 560 Minneapolis MN, 55401 United States	Electronic Service		No	Official 24-432
183	David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency		220 South Sixth Street Suite 1300 Minneapolis MN, 55402 United States	Electronic Service		No	Official 24-432
184	Sephra	Ninow	sephra.ninow@energycenter.org	Center for Sustainable Energy		426 17th Street, Suite 700 Oakland CA, 94612 United States	Electronic Service		No	Official 24-432
185	Michael	Noble	noble@fresh-energy.org	Fresh Energy		408 Saint Peter St Ste 350 Saint Paul MN, 55102 United States	Electronic Service		No	Official 24-432
186	Rolf	Nordstrom	mordstrom@gpisd.net	Great Plains Institute		2801 21ST AVE S STE 220 Minneapolis MN, 55407-1229 United States	Electronic Service		No	Official 24-432
187	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	Official 24-432

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
188	Christian	Noyce	christian.noyce@state.mn.us		Public Utilities Commission	759 Hague Ave St Paul MN, 55104 United States	Electronic Service		Yes	Official 24-432
189	David	O'Brien	david.obrien@navigant.com	Navigant Consulting		77 South Bedford St Ste 400 Burlington MA, 01803 United States	Electronic Service		No	Official 24-432
190	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	Official 24-432
191	Ric	O'Connell	ric@gridlab.org	GridLab		2120 University Ave Berkeley CA, 94704 United States	Electronic Service		No	Official 24-432
192	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	Official 24-432
193	Matthew	Olsen	molsen@otpc.com	Otter Tail Power Company		215 South Cascade Street Fergus Falls MN, 56537 United States	Electronic Service		No	Official 24-432
194	Russell	Olson	rolson@hcpd.com	Heartland Consumers Power District		PO Box 248 Madison SD, 57042-0248 United States	Electronic Service		No	Official 24-432
195	Debra	Opatz	dopatz@otpc.com	Otter Tail Power Company		215 South Cascade Street Fergus Falls MN, 56537 United States	Electronic Service		No	Official 24-432
196	Nate	O'Reilly	nate@iron512.com			851 Pierce Butler Route St Paul MN, 55104 United States	Electronic Service		No	Official 24-432
197	Carol A.	Overland	overland@legalelectric.org	Legalelectric - Overland Law Office		1110 West Avenue Red Wing MN, 55066 United States	Electronic Service		No	Official 24-432
198	John	Pacheco	johnpachecojr@gmail.com			null null, null United States	Electronic Service		No	Official 24-432
199	Greg	Palmer	gpalmer@greatermngas.com	Greater Minnesota Gas, Inc.		1900 Cardinal Ln PO Box 798 Faribault MN, 55021 United States	Electronic Service		No	Official 24-432
200	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		Yes	Official 24-432
201	Dan	Patry	dpatry@sunedison.com	SunEdison		600 Clipper Drive Belmont CA, 94002 United States	Electronic Service		No	Official 24-432
202	Jeffrey C	Paulson	jeff.jcplaw@comcast.net	Paulson Law Office, Ltd.		4445 W 77th Street	Electronic Service		No	Official 24-432

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						Suite 224 Edina MN, 55435 United States				
203	Jose	Perez	jose@hispanicsinenergy.com			1017 L Street #719 Sacramento CA, 95814 United States	Electronic Service		No	Official 24-432
204	Lisa	Perry	lisa.perry@walmart.com			2608 SE J St Bentonville AR, 72716 United States	Electronic Service		No	Official 24-432
205	Jennifer	Peterson	jjpeterson@mnpower.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	Official 24-432
206	Catherine	Phillips	catherine.phillips@wecenergygroup.com	Minnesota Energy Resources		231 West Michigan St Milwaukee WI, 53203 United States	Electronic Service		No	Official 24-432
207	Marcia	Podratz	mpodratz@mnpower.com	Minnesota Power		30 W Superior S Duluth MN, 55802 United States	Electronic Service		No	Official 24-432
208	Hannah	Polikov	hpolikov@aee.net	Advanced Energy Economy Institute		1000 Vermont Ave, Third Floor Washington DC, 20005 United States	Electronic Service		No	Official 24-432
209	J.	Porter	greg.porter@nngco.com	Northern Natural Gas Company		1111 South 103rd St Omaha NE, 68124 United States	Electronic Service		No	Official 24-432
210	Kevin	Pranis	kpranis@liunagroc.com	Laborers' District Council of MN and ND		81 E Little Canada Road St. Paul MN, 55117 United States	Electronic Service		No	Official 24-432
211	David G.	Prazak	dprazak@otpc.com	Otter Tail Power Company		P.O. Box 496 215 South Cascade Street Fergus Falls MN, 56538-0496 United States	Electronic Service		No	Official 24-432
212	Kenneth	Rance	krance@sabathani.org	Sabathani Community Center		310 East 38th St Rm #120 Minneapolis MN, 55409 United States	Electronic Service		No	Official 24-432
213	John C.	Reinhardt		Laura A. Reinhardt		3552 26th Ave S Minneapolis MN, 55406 United States	Paper Service		No	Official 24-432
214	Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	1400 BRM Tower 445 Minnesota St St. Paul MN, 55101-2131 United States	Electronic Service		Yes	Official 24-432
215	Kevin	Reuther	kreuther@mncenter.org	MN Center for Environmental Advocacy		26 E Exchange St, Ste 206 St. Paul MN, 55101-1667 United States	Electronic Service		No	Official 24-432

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
216	John	Reynolds	john.reynolds@nfib.org			180 5th St E Suite 260 St. Paul MN, 55101 United States	Electronic Service		No	Official 24-432
217	Whitney	Richardson	whitney.richardson@evgo.com	EVgo Services, LLC		11835 W Olympic Blvd Ste 900E Los Angeles CA, 90064 United States	Electronic Service		No	Official 24-432
218	Noah	Roberts	nroberts@cleanpower.org	Energy Storage Association		1155 15th St NW, Ste 500 Washington DC, 20005 United States	Electronic Service		No	Official 24-432
219	Alice	RobertsDavis	admin.info@state.mn.us	Department of Administration		15 Sherburne Avenue St. Paul MN, 55155 United States	Electronic Service		No	Official 24-432
220	Susan	Romans	sromans@allete.com	Minnesota Power		30 West Superior Street Legal Dept Duulth MN, 55802 United States	Electronic Service		No	Official 24-432
221	Amanda	Rome	amanda.rome@xcelenergy.com	Xcel Energy		414 Nicollet Mall FL 5 Minneapolis MN, 55401 United States	Electronic Service		No	Official 24-432
222	Robert K.	Sahr	bsahr@eastriver.coop	East River Electric Power Cooperative		P.O. Box 227 Madison SD, 57042 United States	Electronic Service		No	Official 24-432
223	Renee	Samson	rsamson@freewiretech.com	FreeWire Technologies		1999 Harrison St Oakland CA, 94612 United States	Electronic Service		No	Official 24-432
224	Joseph L	Sathe	jsathe@kennedy-graven.com	Kennedy & Graven, Chartered		150 S 5th St Ste 700 Minneapolis MN, 55402 United States	Electronic Service		No	Official 24-432
225	Tim	Schaefer	thschaef@gmail.com	Environment MN		211 N 1st St Ste 480 Minneapolis MN, 55401 United States	Electronic Service		No	Official 24-432
226	Kevin	Schlangen	kevin.schlangen@co.dakota.mn.us	Dakota County		2800 160th Street West Rosemount MN, 55068 United States	Electronic Service		No	Official 24-432
227	Jacob J.	Schlesinger	jschlesinger@keyesfox.com	Keyes & Fox LLP		1580 Lincoln St Ste 880 Denver CO, 80203 United States	Electronic Service		No	Official 24-432
228	Elizabeth	Schmiesing	eschmiesing@winthrop.com	Winthrop & Weinstine, P.A.		225 South Sixth Street Suite 3500 Minneapolis MN, 55402 United States	Electronic Service		No	Official 24-432
229	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	Official 24-432

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
230	Kay	Schraeder	kschraeder@minnkota.com	Minnkota Power		5301 32nd Ave S Grand Forks ND, 58201 United States	Electronic Service		No	Official 24-432
231	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	Official 24-432
232	Christine	Schwartz	regulatory.records@xcelenergy.com	Xcel Energy		414 Nicollet Mall, MN1180-07-MCA Minneapolis MN, 55401-1993 United States	Electronic Service		No	Official 24-432
233	Doug	Scott	dscott@gpisd.net	Great Plains Institute		2801 21st Ave Ste 220 Minneapolis MN, 55407 United States	Electronic Service		No	Official 24-432
234	Dean	Sedgwick	sedgwick@itascapower.com	Itasca Power Company		PO Box 455 Spring Lake MN, 56680 United States	Electronic Service		No	Official 24-432
235	Maria	Seidler	maria.seidler@dom.com	Dominion Energy Technology		120 Tredegar Street Richmond VA, 23219 United States	Electronic Service		No	Official 24-432
236	Will	Seuffert	will.seuffert@state.mn.us		Public Utilities Commission	121 7th PI E Ste 350 Saint Paul MN, 55101 United States	Electronic Service		Yes	Official 24-432
237	Timothy	Sexton	timothy.sexton@state.mn.us		Minnesota Department of Transportation	395 John Ireland Blvd St. Paul MN, 55155-1899 United States	Electronic Service		No	Official 24-432
238	Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates		7400 Lyndale Ave S Ste 190 Richfield MN, 55423 United States	Electronic Service		No	Official 24-432
239	Patricia	Sharkey	psharkey@environmentallawcounsel.com	Midwest Cogeneration Association.		180 N LaSalle St Ste 3700 Chicago IL, 60601 United States	Electronic Service		No	Official 24-432
240	Bria	Shea	bria.e.shea@xcelenergy.com	Xcel Energy		414 Nicollet Mall Minneapolis MN, 55401 United States	Electronic Service		No	Official 24-432
241	Doug	Shoemaker	dougs@charter.net	Minnesota Renewable Energy		2928 5th Ave S Minneapolis MN, 55408 United States	Electronic Service		No	Official 24-432
242	Anne	Smart	anne.smart@chargepoint.com	ChargePoint, Inc.		254 E Hacienda Ave Campbell CA, 95008 United States	Electronic Service		No	Official 24-432
243	Amanda	Smith	amanda.smith@state.mn.us		Minnesota Pollution Control Agency	520 Lafayette Rd N St. Paul MN, 55155 United States	Electronic Service		No	Official 24-432
244	Beth	Smith	bsmith@greatermankato.com	Greater Mankato Growth		1961 Premier Dr Ste 100	Electronic Service		No	Official 24-432

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						Mankato MN, 56001 United States				
245	Joshua	Smith	joshua.smith@sierraclub.org			85 Second St FL 2 San Francisco CA, 94105 United States	Electronic Service		No	Official 24-432
246	Ken	Smith	ken.smith@ever-greenenergy.com	Ever Green Energy		305 Saint Peter St Saint Paul MN, 55102 United States	Electronic Service		No	Official 24-432
247	Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.		76 W Kellogg Blvd St. Paul MN, 55102 United States	Electronic Service		No	Official 24-432
248	Trevor	Smith	trevor.smith@avantenergy.com	Avant Energy, Inc.		220 South Sixth Street Suite 1300 Minneapolis MN, 55402 United States	Electronic Service		No	Official 24-432
249	Beth	Soholt	bsoholt@cleangridalliance.org	Clean Grid Alliance		570 Asbury Street Suite 201 St. Paul MN, 55104 United States	Electronic Service		No	Official 24-432
250	Anna	Sommer	asommer@energyfuturesgroup.com	Energy Futures Group		PO Box 692 Canton NY, 13617 United States	Electronic Service		No	Official 24-432
251	Peggy	Sorum	peggy.sorum@centerpointenergy.com	CenterPoint Energy		505 Nicollet Mall Minneapolis MN, 55402 United States	Electronic Service		No	Official 24-432
252	Mark	Spurr	mspurr@fvbenergy.com	International District Energy Association		222 South Ninth St., Suite 825 Minneapolis MN, 55402 United States	Electronic Service		No	Official 24-432
253	Sky	Stanfield	stanfield@smwlaw.com	Shute, Mihaly & Weinberger		396 Hayes Street San Francisco CA, 94102 United States	Electronic Service		No	Official 24-432
254	Jamez	Staples	jstaples@renewablenrgpartners.com	Renewable Energy Partners		3033 Excelsior Blvd S Minneapolis MN, 55416 United States	Electronic Service		No	Official 24-432
255	Russ	Stark	russ.stark@ci.stpaul.mn.us	City of St. Paul		Mayor's Office 15 W. Kellogg Blvd., Suite 390 Saint Paul MN, 55102 United States	Electronic Service		No	Official 24-432
256	Byron E.	Starns	byron.starns@stinson.com	STINSON LLP		50 S 6th St Ste 2600 Minneapolis MN, 55402 United States	Electronic Service		No	Official 24-432
257	Richard	Stasik	richard.stasik@wecenergygroup.com	Minnesota Energy Resources Corporation (HOLDING)		231 West Michigan St - P321 Milwaukee WI, 53203 United States	Electronic Service		No	Official 24-432
258	Kristin	Stastny	kstastny@taftlaw.com	Taft Stettinius & Hollister LLP		2200 IDS Center	Electronic Service		No	Official 24-432

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						80 South 8th Street Minneapolis MN, 55402 United States				
259	Lindsey	Stegall	lindsey.stegall@evgo.com	EVgo Services, LLC		11835 W Olympic Blvd Ste 900E Los Angeles CA, 90064 United States	Electronic Service		No	Official 24-432
260	Cary	Stephenson	cstephenson@otpc.com	Otter Tail Power Company		215 South Cascade Street Fergus Falls MN, 56537 United States	Electronic Service		No	Official 24-432
261	Scott	Strand	sstrand@elpc.org	Environmental Law & Policy Center		60 S 6th Street Suite 2800 Minneapolis MN, 55402 United States	Electronic Service		No	Official 24-432
262	James M	Strommen	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered		150 S 5th St Ste 700 Minneapolis MN, 55402 United States	Electronic Service		No	Official 24-432
263	Dean	Taylor	dtaylor@pluginamerica.org	Plug In America		6380 Wilshire Blvd, Suite 1000 Los Angeles CA, 90048 United States	Electronic Service		No	Official 24-432
264	Hanna	Terwilliger	hanna.terwilliger@state.mn.us		Public Utilities Commission	121 East 7th Place, Suite 350 Saint Paul MN, 55101 United States	Electronic Service		Yes	Official 24-432
265	Stuart	Tommerdahl	stommerdahl@otpc.com	Otter Tail Power Company		215 S Cascade St PO Box 496 Fergus Falls MN, 56537 United States	Electronic Service		No	Official 24-432
266	Taige	Tople	taige.d.tople@xcelenergy.com	Northern States Power Company dba Xcel Energy-Elec		414 Nicollet Mall 401 7th Floor Minneapolis MN, 55401 United States	Electronic Service		No	Official 24-432
267	Pat	Treseler	pat.jcplaw@comcast.net	Paulson Law Office LTD		4445 W 77th Street Suite 224 Edina MN, 55435 United States	Electronic Service		No	Official 24-432
268	Analeisha	Vang	avang@mnpower.com			30 W Superior St Duluth MN, 55802-2093 United States	Electronic Service		No	Official 24-432
269	Nikhil	Vijaykar	nvijaykar@keyesfox.com	Keyes & Fox LLP		580 California St 12th Floor San Francisco CA, 94104 United States	Electronic Service		No	Official 24-432
270	Christopher	Villarreal	cvillarreal@rstreet.org	R Street Institute		1212 New York Ave NW Ste 900 Washington DC, 20005 United States	Electronic Service		No	Official 24-432
271	Julie	Voeck	julie.voeck@nee.com	NextEra Energy Resources, LLC		700 Universe Blvd Juno Beach	Electronic Service		No	Official 24-432

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285	Alicia	Zaloga	azaloga@keyesfox.com	Keyes & Fox, LLP		1155 Kildaire Farm Rd Ste 202-203 Cary NC, 27511 United States	Electronic Service		No	Official 24-432
286	Christopher	Zibart	czibart@atcllc.com	American Transmission Company LLC		W234 N2000 Ridgeview Pkwy Court Waukesha WI, 53188-1022 United States	Electronic Service		No	Official 24-432
287	Kurt	Zimmerman	kwz@ibew160.org	Local Union #160, IBEW		2909 Anthony Ln St Anthony Village MN, 55418-3238 United States	Electronic Service		No	Official 24-432
288	Patrick	Zomer	pat.zomer@lawmoss.com	Moss & Barnett PA		150 S 5th St #1200 Minneapolis MN, 55402 United States	Electronic Service		No	Official 24-432