

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

Katie Sieben	Chair
Dan Lipschultz	Vice Chair
Valerie Means	Commissioner
Matt Schuerger	Commissioner
John Tuma	Commissioner

In the Matter of the Petition of Northern  
States Power Company for Approval of the  
2019-2021 Triennial Nuclear  
Decommissioning Study and Assumptions

DOCKET NO. E-002/M-17-828

**REPLY COMMENTS OF THE OFFICE  
OF THE ATTORNEY GENERAL**

**I. INTRODUCTION**

The Office of the Attorney General—Residential Utilities and Antitrust Division (“OAG”) respectfully submits the following Reply Comments in response to the Public Utilities Commission’s (“Commission”) Notice of Comment Period (“Notice”) issued on July 22, 2019.<sup>1</sup> The OAG reiterates its recommendation that the Commission should decline to modify Northern States Power Company’s (“Xcel”) Annual Decommissioning Accrual based on the factors in the Commission’s January 17, 2019 Order (“January 2019 Order”).<sup>2</sup> The OAG’s Reply Comments also support the Department of Commerce’s (“Department”) recommendations in its Initial Comments that Xcel be required to: 1) provide additional Nuclear Decommissioning Trust (“NDT”) financial inputs information; 2) work with the Department to explain how Xcel’s NDT processes work; and 3) provide additional information in the company’s reply comments related to the mechanics of Xcel’s sinking fund calculations.<sup>3</sup>

---

<sup>1</sup> Notice of Comment Period (July 22, 2019).

<sup>2</sup> *In the Matter of the Petition of Northern States Power Company for Approval of the 2019-2021 Triennial Nuclear Decommissioning Study and Assumptions*, Docket No. E-002/M-17-828, ORDER APPROVING DECOMMISSIONING STUDY, AND TAKING OTHER ACTION 7 (Jan. 7, 2019) (“January 2019 Order”).

<sup>3</sup> See generally Department Initial Comments (Aug. 19, 2019).

## **II. BACKGROUND**

This proceeding is an outgrowth of Xcel's 2019-2021 Triennial Petition ("Petition") in which Xcel stated that the Annual Decommissioning Accrual for 2019 would be approximately \$45 million, assuming immediate decommissioning following the end of each of the three plant licenses.<sup>4</sup> Subsequent to the Petition, the Department recommended that the Commission set Xcel's total nuclear decommissioning accrual at \$44.4 million.<sup>5</sup> In its January 2019 Order, the Commission approved the Department's recommendation with the caveat that the \$44.4 million Annual Decommissioning Accrual would be subject to possible revision based on, among other things, the implications of the following three factors: 1) Department of Energy ("DOE") continuing refunds for dry cask storage during the decommissioning process; 2) use of the SAFSTOR decommissioning method; and 3) possible use of third-party contractors for nuclear decommissioning.<sup>6</sup> On August 19, 2019, the OAG and the Department filed comments addressing the three factors from the January 2019 Order and the Commission's Notice. For the reasons described below, the Commission should not alter Xcel's Annual Decommissioning Accrual at this time and should approve the Department's NDT financial inputs and processes, and sinking fund recommendations.

## **III. THE COMMISSION SHOULD RETAIN A CONSERVATIVE APPROACH TO XCEL'S ANNUAL DECOMMISSIONING ACCRUAL.**

The Commission should refrain from modifying Xcel's Annual Decommissioning Accrual based on assumed DOE reimbursement of dry fuel storage costs. Rather, the Commission should retain the conservative \$44.4 million Annual Decommissioning Accrual

---

<sup>4</sup> *In the Matter of the Petition of Northern States Power Company for Approval of the 2019-2021 Triennial Nuclear Decommissioning Study and Assumptions*, Docket No. E-002/M-17-828, PETITION 2 (Dec. 1, 2017) (referencing one nuclear-powered generator license for the Monticello Nuclear Generating Plant and two nuclear-powered generator licenses for the Prairie Island Nuclear Generating Plant).

<sup>5</sup> Department Initial Comments at 2.

<sup>6</sup> January 2019 Order at 7.

approved in its January 2019 Order. As the OAG explained in its Initial Comments,<sup>7</sup> Xcel's arguments for DOE reimbursement are based on an inconclusive expert opinion, anecdotal reports from other nuclear operators regarding their current experience with DOE reimbursements, and a company-centric view of the benefits of litigation if the DOE must be sued to enforce reimbursement of dry fuel storage costs.<sup>8</sup> The DOE's past failure to comply with its statutory and contractual nuclear decommissioning obligations and indications of renewed activity by the Nuclear Regulatory Commission ("NRC") to establish a viable nuclear waste site further support preservation of the \$44.4 million Xcel Annual Decommissioning Accrual.<sup>9</sup> While completion of a nuclear waste site is not likely in the immediate future, the NRC's recent actions appear to signal renewed efforts to resolve the nuclear waste storage issue. Theoretically, such a resolution could occur prior to the termination of Xcel's three nuclear plant licenses. Thus, the safest and most reasonable course at this time is for the Commission to uphold the \$44.4 million Annual Decommissioning Accrual from the January 2019 Order.

If the Commission is persuaded to modify the Annual Decommissioning Accrual to account for DOE reimbursement of dry fuel storage costs into and through decommissioning, the Commission should adopt the 75% DOE benchmark advanced by the Department. As underscored by the Department, Xcel has previously struggled to estimate a proper DOE reimbursement amount.<sup>10</sup> The more conservative \$27.4 million nuclear decommissioning accrual for 2020, while not OAG's preference, more adequately protects ratepayers and the NDT

---

<sup>7</sup> OAG Initial Comments at 9-11.

<sup>8</sup> *Id.*

<sup>9</sup> Lauren S. Laughlin, *Battle Emerges Over Nuclear Waste in America's Oil Patch; Proposal to Put Atomic-Waste Site in Permian Basin Moves Forward as Opponents Worry about Threat to Valuable U.S. Oil Fields*, WALL ST. J., Aug. 14, 2019, Attachment A.

<sup>10</sup> Department Initial Comments at 7.

than Xcel's \$22.8 million accrual recommendation.<sup>11</sup> The Commission should not contemplate reverting to the \$14 million current decommissioning accrual given the Department's explanation of the unavoidable delays related to Xcel's current Integrated Resource Plan and the significant regulatory review required by the NRC if the life of the Monticello plant is extended.<sup>12</sup> It is vital that the Commission take all possible action to ensure that Xcel's NDT will be sufficient to fund nuclear decommissioning when the time comes, as any funding gap will be recovered directly from ratepayers.

**IV. ALTHOUGH IT IS PREMATURE TO ADOPT EITHER SAFSTOR OR THIRD-PARTY DECOMMISSIONING, THE COMMISSION SHOULD CAREFULLY MONITOR BOTH METHODS IN FUTURE PROCEEDINGS.**

The information provided in Xcel's July 15, 2019 Compliance Filing,<sup>13</sup> as well as the Department's and OAG's Initial Comments, illustrate that changes to Xcel's Annual Decommissioning Accrual based on SAFSTOR or third-party decommissioning are premature. As these nuclear decommissioning methods evolve and the Commission considers their future utility, however, it should keep in mind some of the attributes of each method that could negatively impact ratepayers.

First, the selection of SAFSTOR, otherwise known as deferred decommissioning, automatically extends the life of Xcel's nuclear plants. As discussed in the OAG's Initial Comments,<sup>14</sup> SAFSTOR has the potential to increase costs for ratepayers if Xcel's NDT investment mix and strategy does not outpace inflation and other costs.<sup>15</sup> Thus, any future

---

<sup>11</sup> *Id.* at 4-7.

<sup>12</sup> *Id.* at 7.

<sup>13</sup> *In the Matter of the Petition of Northern States Power Company for Approval of the 2019-2021 Triennial Nuclear Decommissioning Study and Assumptions*, Docket No. E-002/M-17-828, XCEL COMPLIANCE FILING, NUCLEAR DECOMMISSIONING ACCRUAL 1, 5-7 (July 15, 2019).

<sup>14</sup> OAG Initial Comments at 5-6 (Aug. 19, 2019).

<sup>15</sup> *Id.*

Commission approval of the SAFSTOR decommissioning method should include a requirement that Xcel work with the Department to ensure an optimal investment portfolio.

Second, third-party decommissioning agreements should not be a profit-making vehicle for contractors at ratepayer expense.<sup>16</sup> The purpose of an NDT is to ensure sufficient resources to decontaminate and remove a nuclear facility at the end of its used and useful operating life.<sup>17</sup> Thus, the Commission should summarily reject any future third-party decommissioning agreement that incentivizes over-collection of funds from ratepayers, fails to return unspent funds to ratepayers, or results in a windfall to third-party contractors.<sup>18</sup>

Initial Comments from the OAG and the Department demonstrate that the only appropriate step for the Commission to take at this time with respect to SAFSTOR and third-party decommissioning is to require Xcel to continue monitoring the industry and gather additional information.<sup>19</sup> Moreover, consistent with the Commission's initial directive to consider alternate nuclear decommissioning options, Xcel should be required to explore the ENTOMB/*In Situ* option.<sup>20</sup> While still in its infancy, this decommissioning method has shown preliminary signs of significant cost savings.<sup>21</sup> This alone presents a compelling basis for tracking the future evolution of ENTOMB/*In Situ*.

**V. THE COMMISSION SHOULD REQUIRE XCEL TO WORK WITH THE DEPARTMENT TO IMPROVE THE COMPANY'S NDT FINANCIAL INPUTS.**

Xcel should provide more insight regarding its NDT financial inputs and processes. As noted by the Department, "the amount of the decommissioning accrual is quite sensitive to

---

<sup>16</sup> OAG Initial Comments at 6-8

<sup>17</sup> *Id.* at 6.

<sup>18</sup> *Id.* at 6-8.

<sup>19</sup> OAG Initial Comments at 4-5, 8; Department Initial Comments at 9.

<sup>20</sup> OAG Initial Comments at 8-9.

<sup>21</sup> *Id.*

changes in the return assumptions[] and the impact of the changes to Xcel’s return assumptions since 2014 is large.”<sup>22</sup> The Department has an extended history of working with Xcel to increase NDT returns, while decreasing fees paid to external investment managers.<sup>23</sup> In its Initial Comments, the Department has indicated that “it may be reasonable to make a few more adjustments to Xcel’s investments to generate reasonably higher returns.”<sup>24</sup> Accordingly, the Commission should support the Department’s request for clarity regarding the derivation of Xcel’s expected returns for asset classes, as well as the company’s calculation of expected portfolio returns.<sup>25</sup> Similarly, the Commission should support the Department’s continued involvement with, and active examination of, Xcel’s asset allocation decisions.<sup>26</sup> Finally, the Commission should require Xcel to provide the information specified by the Department in the Question 3 response section of its Initial Comments.<sup>27</sup>

**VI. THE DEPARTMENT’S REQUEST FOR ADDITIONAL INFORMATION REGARDING THE MECHANICS OF XCEL’S NUCLEAR FUEL SINKING FUND IS REASONABLE AND SHOULD BE ADDRESSED BY THE COMPANY IN THIS PROCEEDING.**

Xcel’s updated end of life nuclear fuel accrual may not be reasonable. It is distressing that ratepayers may have “effectively and unreasonably” provided Xcel with an interest free loan via Xcel’s sinking fund.<sup>28</sup> If Xcel’s “amount recovered” balance includes only the sum of past accruals, and not also the interest earned on those accruals, ratepayers should be credited for prepayment as recognized by the Department.<sup>29</sup> To properly safeguard ratepayer interests, the

---

<sup>22</sup> Department Initial Comments at 11.

<sup>23</sup> *Id.* at 12-13.

<sup>24</sup> *Id.* at 12.

<sup>25</sup> *Id.* at 11-12.

<sup>26</sup> *Id.* at 12-15.

<sup>27</sup> *Id.* at 18.

<sup>28</sup> *Id.* at 15.

<sup>29</sup> *Id.* at 15

Commission should require Xcel to provide the information specified by the Department in the Question 4 response section of its Initial Comments.<sup>30</sup>

## **VII. CONCLUSION**

For the reasons set forth above, the Commission should decline to modify Xcel's Annual Decommissioning Accrual based on the factors in the its January 2019 Order. If the Commission determines that modification of the accrual is warranted based on dry fuel storage costs, it should adopt the 75% estimated DOE reimbursement figure recommended by the Department to protect ratepayers. While it is premature for the Commission to require changes to Xcel's Annual Decommissioning Accrual based on SAFSTOR or third-party decommissioning, it should be aware of, and closely monitor, certain attributes of each decommissioning method that could result in unreasonable consequences to ratepayers if approved in the future. The Commission should require Xcel to provide the financial inputs information requested by, and work with, the Department to ensure optimal growth of the NDT funds while decreasing fees paid to external investment managers. Finally, the Commission should require Xcel to provide clarity regarding

---

<sup>30</sup> *Id.* at 19.

the mechanics of its nuclear sinking fund to ensure the company is not the benefactor of an involuntary interest free loan from ratepayers.

Dated: August 29, 2019

Respectfully submitted,

KEITH ELLISON  
Attorney General  
State of Minnesota

s/ **Kristin Berkland**

---

KRISTIN BERKLAND  
Assistant Attorney General  
Atty. Reg. No. 0394804

445 Minnesota Street, Suite 1400  
St. Paul, Minnesota 55101-2127  
(651) 757-1236 (Voice)  
(651) 296-9663 (Fax)  
kristin.berkland@ag.state.mn.us

ATTORNEYS FOR OFFICE OF THE  
ATTORNEY GENERAL—RESIDENTIAL  
UTILITIES AND ANTITRUST DIVISION



# Battle Emerges Over Nuclear Waste in America's Oil Patch; Proposal to put atomic-waste site in Permian Basin moves forward as opponents worry about threat to valuable U.S. oil fields

Lauren Silva Laughlin . Wall Street Journal (Online) ; New York, N.Y. [New York, N.Y.]14 Aug 2019.

[ProQuest document link](#)

---

## FULL TEXT

A plan to build two big nuclear-waste storage facilities in the heart of the most important U.S. oil field is igniting a fight between frackers and the atomic-energy industry.

The Nuclear Regulatory Commission is considering proposals to put up to 210,000 tons of nuclear waste—including the most dangerous high-level waste—at two sites in the Permian Basin, the booming oil-and-gas producing region along the Texas-New Mexico border.

The temporary facilities would be surrounded by fracking equipment—shale oil drillers that pump water and sand into the ground at high pressure to break apart rocks and free up oil and gas. One step in the fracking process can lead to earthquakes, according to the U.S. Geological Survey.

Stephanie Garcia Richard, New Mexico's commissioner of public lands, has sent letters to the NRC opposing the facilities, which she said are "smack in the middle" of the oil field. She is joined by oil drillers, who say they are planning to explore for oil around and below the storage site. One of the sites is in a West Texas county that produced 42 million barrels of oil last year.

The NRC is reviewing the proposals and is expected to release results of preliminary environmental studies as early as March. The nuclear waste would be shipped to the locations by train from nuclear reactors all over the country. Together, the sites effectively have enough room to store all the current high-level waste being held at U.S. nuclear power plants.

Finding a place to permanently store waste has been a perennial issue for the nuclear-power industry. Plans for a permanent disposal site in Nevada's Yucca Mountain, picked by Congress in 1987, have been stalled for years. In lieu of a permanent facility, fuel is currently housed mainly at nuclear facilities.

The Texas site is one of four U.S. locations with a facility for housing low-level nuclear waste, which typically consists of contaminated items like clothing, rags, mops, equipment and tools. High-level waste, which is far more toxic, includes used fuel from nuclear power plants and takes hundreds of thousands of years to decay.

Two companies, Interim Storage Partners and Holtec International, are seeking 40-year licenses to take the spent fuel in what is considered a temporary solution. Interim Storage plans to operate a new facility near the West Texas site while Holtec's site is over the border in New Mexico.

Interim Storage Partners CEO Jeffrey Isakson says the company's application takes into consideration the possibility of seismic activity caused by drilling and other impacts from oil and gas production.

### Share Your Thoughts

What do you think of the proposal to store high-level nuclear waste in the Permian Basin? Join the conversation below.

"These systems have been designed to withstand extreme seismic events, and have been proven effective over decades of use," Mr. Isakson said in a statement.

Holtec's Chief Strategy Officer Joy Russell says its facility was designed to withstand an earthquake that is far

more dangerous than the worst earthquake expected over a 10,000-year period.

Because these are considered interim facilities, the waste would be stored on or near the surface. A permanent facility, where spent fuel would be stored 1,000 feet underground, would be preferable, says Charles Forsberg, principal research scientist at the Department of Nuclear Science and Engineering at the Massachusetts Institute of Technology. "You have erosion, you have people, you have wars and all sorts of other things," he said.

Some worry that if granted, the licenses could be renewed. "These sites may end up storing this waste permanently," U.S. Senator John Barrasso, a Wyoming Republican said.

Interim Storage Partners is a joint venture of the U.S. division of French company Orano SA and Waste Control Specialists LLC, which was bought in 2018 by private equity firm J.F. Lehman & Company. WCS owns the low-level waste facility in Texas, which would be adjacent to the new high-level facility if plans are approved.

WCS's site first opened in 2012, just as drillers were starting to use sophisticated hydraulic fracking in the Permian, which turned it into one of the world's largest producing oil fields. "A decade ago we didn't have the multistage horizontal fracturing so how could we have anticipated the geological impact of that?" said Ms. Richard, New Mexico's Commissioner of Public Lands. She also noted the seismic impact of the fracking process that requires reinjecting water into the ground. "The seismic result of the reinjection is unknown," she said.

The U.S. Geological Survey says the disposal of waste fluid from the fracking process can cause earthquakes. A 2007 report from the International Atomic Energy Agency cautioned that high-level nuclear sites should be single-use and "avoid land with exploitable mineral and energy resources."

Recently, Fasken Oil and Ranch, a driller based in Midland, Texas, sent a note to the NRC saying that it was developing new fracking technologies and intends to dig "beneath and surrounding" Holtec's planned site in New Mexico, using some 20 million barrels of water and high-pressure sand.

Fasken is worried about the financial impact the nuclear site could have on the land and minerals in the area.

Write to Lauren Silva Laughlin at [lauren.silvalaughlin@wsj.com](mailto:lauren.silvalaughlin@wsj.com)

Credit: By Lauren Silva Laughlin

## DETAILS

<b>Subject:</b>	Radioactive wastes; Hydraulic fracturing; Energy industry; Nuclear power plants; Geology; Oil fields; Public lands; Earthquakes
<b>Location:</b>	Wyoming Permian Basin Nevada Yucca Mountain Texas New Mexico United States--US Massachusetts West Texas
<b>People:</b>	Barrasso, John
<b>Company / organization:</b>	Name: J F Lehman &Co; NAICS: 523910; Name: Nuclear Regulatory Commission--NRC; NAICS: 926130; Name: Waste Control Specialists LLC; NAICS: 562211; Name: US Geological Survey; NAICS: 541711, 924120; Name: Massachusetts Institute of Technology; NAICS: 611310; Name: Congress; NAICS: 921120; Name: Holtec International; NAICS: 332410; Name: International Atomic Energy Agency--IAEA; NAICS: 813940
<b>Publication title:</b>	Wall Street Journal (Online); New York, N.Y.
<b>Publication year:</b>	2019
<b>Publication date:</b>	Aug 14, 2019

column: U.S. News

Section: US

Publisher: Dow Jones & Company Inc

Place of publication: New York, N.Y.

Country of publication: United States, New York, N.Y.

Publication subject: Business And Economics

Source type: Newspapers

Language of publication: English

Document type: News

ProQuest document ID: 2272650945

Copyright: Copyright 2019 Dow Jones & Company, Inc. All Rights Reserved.

Last updated: 2019-08-15

Database: Global Newsstream

---

Database copyright © 2019 ProQuest LLC. All rights reserved.

[Terms and Conditions](#) [Contact ProQuest](#)



**KEITH ELLISON**  
ATTORNEY GENERAL

# STATE OF MINNESOTA

OFFICE OF THE ATTORNEY GENERAL

SUITE 1400  
445 MINNESOTA STREET  
ST. PAUL, MN 55101-2131  
TELEPHONE: (651) 296-7575

August 29, 2019

Mr. Daniel Wolf, Executive Secretary  
Minnesota Public Utilities Commission  
121 Seventh Place East, Suite 350  
St. Paul, MN 55101-2147

**Re: In the Matter of the Petition of Northern States Power Company for  
Approval of the 2019-2021 Triennial Nuclear Decommissioning Study and  
Assumptions  
MPUC Docket No. E-002/M-17-828**

Dear Mr. Wolf:

Enclosed and e-filed in the above-referenced matter please find Reply Comments of the Minnesota Office of the Attorney General—Residential Utilities and Antitrust Division.

By copy of this letter all parties have been served. An Affidavit of Service is also enclosed.

Sincerely,

s/ **Kristin Berkland**

---

KRISTIN BERKLAND

Assistant Attorney General

(651) 757-1236 (Voice)

(651) 296-9663 (Fax)

kristin.berkland@ag.state.mn.us

Enclosure





First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
David	Aafedt	daafedt@winthrop.com	Winthrop & Weinstine, P.A.	Suite 3500, 225 South Sixth Street  Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_17-828_M-17-828
Christopher	Anderson	canderson@allete.com	Minnesota Power	30 W Superior St  Duluth, MN 558022191	Electronic Service	No	OFF_SL_17-828_M-17-828
Sigurd W.	Anderson	mariner@eldinc.com	Engineering Lab Design	30910 716th St  Lake City, MN 55041	Electronic Service	No	OFF_SL_17-828_M-17-828
Alison C	Archer	aarcher@misoenergy.org	MISO	2985 Ames Crossing Rd  Eagan, MN 55121	Electronic Service	No	OFF_SL_17-828_M-17-828
James J.	Bertrand	james.bertrand@stinson.com	STINSON LLP	50 S 6th St Ste 2600  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_17-828_M-17-828
James	Canaday	james.canaday@ag.state.mn.us	Office of the Attorney General-RUD	Suite 1400 445 Minnesota St. St. Paul, MN 55101	Electronic Service	No	OFF_SL_17-828_M-17-828
John	Coffman	john@johncoffman.net	AARP	871 Tuxedo Blvd.  St. Louis, MO 63119-2044	Electronic Service	No	OFF_SL_17-828_M-17-828
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1800  St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_17-828_M-17-828
Kristen	Eide Tollefson	healingsystems69@gmail.com	R-CURE	28477 N Lake Ave  Frontenac, MN 55026-1044	Electronic Service	No	OFF_SL_17-828_M-17-828
John	Farrell	jfarrell@lsr.org	Institute for Local Self-Reliance	1313 5th St SE #303  Minneapolis, MN 55414	Electronic Service	No	OFF_SL_17-828_M-17-828

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 280  Saint Paul, MN 551012198	Electronic Service	No	OFF_SL_17-828_M-17-828
Edward	Garvey	edward.garvey@AESLconsulting.com	AESL Consulting	32 Lawton St  Saint Paul, MN 55102-2617	Electronic Service	No	OFF_SL_17-828_M-17-828
Janet	Gonzalez	Janet.gonzalez@state.mn.us	Public Utilities Commission	Suite 350 121 7th Place East St. Paul, MN 55101	Electronic Service	No	OFF_SL_17-828_M-17-828
Thomas P.	Harlan	harlan@mdh-law.com	Madigan, Dahl & Harlan, P.A.	222 South Ninth Street Suite 3150 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_17-828_M-17-828
Kimberly	Hellwig	kimberly.hellwig@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_17-828_M-17-828
Michael	Hoppe	il23@mtn.org	Local Union 23, I.B.E.W.	932 Payne Avenue  St. Paul, MN 55130	Electronic Service	No	OFF_SL_17-828_M-17-828
Alan	Jenkins	aj@jenkinsatlaw.com	Jenkins at Law	2265 Roswell Road Suite 100 Marietta, GA 30062	Electronic Service	No	OFF_SL_17-828_M-17-828
Linda	Jensen	linda.s.jensen@ag.state.mn.us	Office of the Attorney General-DOC	1800 BRM Tower 445 Minnesota Street  St. Paul, MN 551012134	Electronic Service	No	OFF_SL_17-828_M-17-828
Richard	Johnson	Rick.Johnson@lawmoss.com	Moss & Barnett	150 S. 5th Street Suite 1200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_17-828_M-17-828
Sarah	Johnson Phillips	sarah.phillips@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_17-828_M-17-828

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Mark J.	Kaufman	mkaufman@ibewlocal949.org	IBEW Local Union 949	12908 Nicollet Avenue South  Burnsville, MN 55337	Electronic Service	No	OFF_SL_17-828_M-17-828
Thomas	Koehler	TGK@IBEW160.org	Local Union #160, IBEW	2909 Anthony Ln  St Anthony Village, MN 55418-3238	Electronic Service	No	OFF_SL_17-828_M-17-828
Michael	Krikava	mkrikava@briggs.com	Briggs And Morgan, P.A.	2200 IDS Center 80 S 8th St Minneapolis, MN 55402	Electronic Service	No	OFF_SL_17-828_M-17-828
Douglas	Larson	dlarson@dakotaelectric.com	Dakota Electric Association	4300 220th St W  Farmington, MN 55024	Electronic Service	No	OFF_SL_17-828_M-17-828
Peder	Larson	plarson@larkinhoffman.com	Larkin Hoffman Daly & Lindgren, Ltd.	8300 Norman Center Drive Suite 1000 Bloomington, MN 55437	Electronic Service	No	OFF_SL_17-828_M-17-828
Peter	Madsen	peter.madsen@ag.state.mn.us	Office of the Attorney General-DOC	Bremer Tower, Suite 1800 445 Minnesota Street St. Paul, Minnesota 551017741	Electronic Service	No	OFF_SL_17-828_M-17-828
Philip	Mahowald	pmahowald@thejacobsonlawgroup.com	Jacobson Law Group	180 East Fifth Street Suite 940  St. Paul, MN 55101	Electronic Service	No	OFF_SL_17-828_M-17-828
Kavita	Maini	kmaini@wi.rr.com	KM Energy Consulting LLC	961 N Lost Woods Rd  Oconomowoc, WI 53066	Electronic Service	No	OFF_SL_17-828_M-17-828
Pam	Marshall	pam@energycents.org	Energy CENTS Coalition	823 7 h St E  St. Paul, MN 55106	Electronic Service	No	OFF_SL_17-828_M-17-828



First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Joseph	Meyer	joseph.meyer@ag.state.mn.us	Office of the Attorney General-RUD	Bremer Tower, Suite 1400 445 Minnesota Street St Paul, MN 55101-2131	Electronic Service	No	OFF_SL_17-828_M-17-828
David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St  Duluth, MN 558022093	Electronic Service	No	OFF_SL_17-828_M-17-828
Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP	33 South Sixth St Ste 4200  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_17-828_M-17-828
David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency	220 South Sixth Street Suite 1300 Minneapolis, Minnesota 55402	Electronic Service	No	OFF_SL_17-828_M-17-828
Jeff	O'Neill	jeff.oneill@ci.monticello.mn.us	City of Monticello	505 Walnut Street Suite 1 Monticello, Minnesota 55362	Electronic Service	No	OFF_SL_17-828_M-17-828
Carol A.	Overland	overland@legalelectric.org	Legalelectric - Overland Law Office	1110 West Avenue  Red Wing, MN 55066	Electronic Service	No	OFF_SL_17-828_M-17-828
Jeff	Oxley	jeff.oxley@state.mn.us	Office of Administrative Hearings	600 North Robert Street  St. Paul, MN 55101	Electronic Service	No	OFF_SL_17-828_M-17-828
Greg	Padden	gpadden@grenergy.com	Great River Energy	12300 Elm Creek Blvd  Maple Grove, MN 55369-4718	Electronic Service	No	OFF_SL_17-828_M-17-828
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_17-828_M-17-828
Kevin	Reuther	kreuther@mncenter.org	MN Center for Environmental Advocacy	26 E Exchange St, Ste 206  St. Paul, MN 551011667	Electronic Service	No	OFF_SL_17-828_M-17-828

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Richard	Savelkoul	rsavelkoul@martinsquires.com	Martin & Squires, P.A.	332 Minnesota Street Ste W2750  St. Paul, MN 55101	Electronic Service	No	OFF_SL_17-828_M-17-828
Jessie	Seim	jessie.seim@piic.org	Prairie Island Indian Community	5636 Sturgeon Lake Rd  Welch, MN 55089	Electronic Service	No	OFF_SL_17-828_M-17-828
Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.	76 W Kellogg Blvd  St. Paul, MN 55102	Electronic Service	No	OFF_SL_17-828_M-17-828
Byron E.	Stams	byron.stams@stinson.com	STINSON LLP	50 S 6th St Ste 2600  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_17-828_M-17-828
James M	Strommen	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered	200 S 6th St Ste 470  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_17-828_M-17-828
Eric	Swanson	eswanson@winthrop.com	Winthrop & Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_17-828_M-17-828
Lynnette	Sweet	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7  Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_17-828_M-17-828
Thomas	Tynes	jjazynka@energyfreedomcoalition.com	Energy Freedom Coalition of America	101 Constitution Ave NW Ste 525 East  Washington, DC 20001	Electronic Service	No	OFF_SL_17-828_M-17-828
Lisa	Veith	lisa.veith@ci.stpaul.mn.us	City of St. Paul	400 City Hall and Courthouse 15 West Kellogg Blvd. St. Paul, MN 55102	Electronic Service	No	OFF_SL_17-828_M-17-828

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Joseph	Windler	jwindler@winthrop.com	Winthrop & Weinstine	225 South Sixth Street, Suite 3500  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_17-828_M-17-828
Daniel P	Wolf	dan.wolf@state.mn.us	Public Utilities Commission	121 7 h Place East Suite 350 St. Paul, MN 551012147	Electronic Service	Yes	OFF_SL_17-828_M-17-828
Patrick	Zomer	Patrick.Zomer@lawmoss.com	Moss & Barnett a Professional Association	150 S. 5th Street, #1200  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_17-828_M-17-828