

**STATE OF MINNESOTA
PUBLIC UTILITIES COMMISSION**

Katie Sieben	Chair
Valerie Means	Commissioner
Matt Schuerger	Commissioner
Joseph K. Sullivan	Commissioner
John Tuma	Commissioner

September 20, 2021

**In the Matter of Xcel Energy Electric's
Petition for Approval of Electric Vehicle
Programs as part of COVID-19 Pandemic
Economic Recovery Investments**

Docket No. E002/M-20-745

**Reply Comments of Fresh Energy, Sierra Club, Union of Concerned Scientists, and
Plug In America**

Fresh Energy, Sierra Club, Union of Concerned Scientists, and Plug In America (the "Clean Energy Groups" or "CEGs") submit these Reply Comments in response to the Commission's [August 3, 2021 Fourth Notice of Extended Comment Period](#).

The CEGs support approval of Xcel Energy's ("Xcel" or "the Company") electric vehicle rebate proposal as modified in our initial comments and further in these reply comments. We also support approval of Xcel's public fast charging proposal as modified in these reply comments, and support approval of Xcel's own fleet electrification. A discussion and response to Xcel and other stakeholders' initial comments is below.

1) Electric Vehicle Rebate Proposal

1.1 Department of Commerce

Light Duty Vehicle Rebates

The Department of Commerce ("Department") lays out a proposal in its initial comments similar to the one offered by the CEGs in ours, as Xcel notes in its reply.^{1,2} There is a minor difference in rebate amount proposed for new light-duty electric vehicles (LDEVs) between the Department

¹ Xcel, "Reply Comments Electric Vehicle Programs as Part of COVID-19 Relief & Recovery," posted September 9, 2021 in Docket E002/M-20-745, at 9. Hereby referred to as "Xcel Reply."

² Initial Comments of Department of Commerce, posted August 26, 2021 in Docket E002/M-20-745, at 9. Hereby referred to as "DOC Reply."

and CEGs, and to converge our recommendations and match the Colorado Program³ exactly the **CEGs also recommend that the per-vehicle light-duty rebate for new vehicles is set at \$5,500**, rather than \$5,000 as the CEGs originally proposed.

The Department also lays out examples of state assistance programs offered in Minnesota that could streamline eligibility for income-qualified residential customers seeking to use the LDEV rebate.⁴ These examples align with the spirit of the CEGs own recommendation to make sure program eligibility and participation made as simple as possible with ease and flexibility for the customer in mind⁵ and we thank and support the Department for including them.

1.2 Xcel Energy

The CEGs appreciate Xcel's openness to reducing the overall electric vehicle (EV) rebate program to match what the CEGs proposed, at least as a "Phase I" investment. We support including discussion and consideration of expanding the EV rebate program as part of the 2023 Transportation Electrification Plan process, per Xcel's suggestion.⁶ Additional responses to Xcel's reply follow.

Managed Charging for Light-Duty Vehicle Rebates

In its reply, Xcel cautions that *not* requiring managed charging when a customer is unable to participate in any existing or future managed charging program would both decrease the grid-related benefits of its LDEV rebate program by reducing the incentive for rebate recipients to charge off-peak and increase administrative costs related to verifying a rebate recipients' ability to participate in a managed charging program.⁷ Instead, the Company suggests keeping the managed charging requirement for most rebate recipients and instead "[explore] simple solutions that would exempt some income-qualified customers from the managed charging requirement if they do not have access to home charging, do not have an ability to charge their vehicle on their existing Xcel Energy account, and/or believe that charging off-peak would create a burden for them given household preferences or work schedule."⁸ While the CEGs did not originally the last point as a barrier to participating in a managed charging program, we appreciate Xcel bringing this up as another possible challenge for income-qualified customers.

³ Colorado PUC, "In the matter of the Application of the Public Service Company of Colorado for Approval of its 2021-2023 Transportation Electrification Plan: Commission Decision Granting Application With Modification." (2021). Hereby referred to as "Colorado Program."

⁴ DOC Reply at 24-45.

⁵ Initial Comments of Clean Energy Groups, posted August 27, 2021 in Docket E002/M-20-745 at 12. Hereby "CEG Initial Comments"

⁶ Xcel Reply at 5

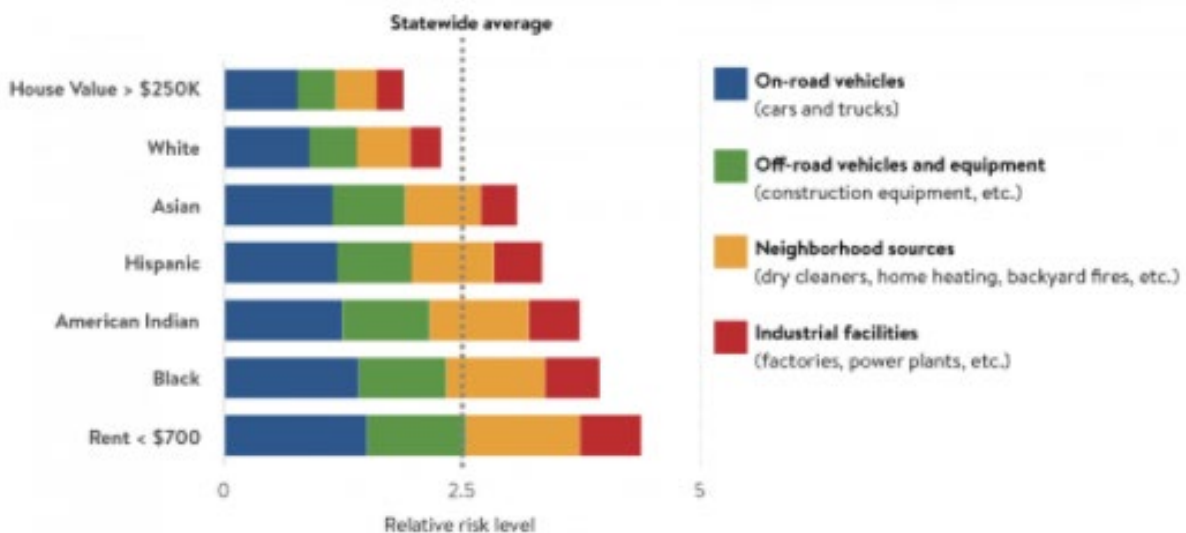
⁷ Xcel Reply at 11

⁸ *Ibid.*

The CEGs agree with Xcel that managed charging is key to supporting the societal and ratepayer benefits of the LDEV rebate program.⁹ However, the LDEV rebate program stands slightly apart from other EV proposals in that it has a stated goal of aiding economic recovery from the COVID-19 pandemic. Given that Black, Indigenous, and people of color (BIPOC) and under-resourced households¹⁰ were and still are impacted most severely by COVID-19, in terms of both economics and health, additional effort to ensure a LDEV program is accessible to and benefits under-resourced and BIPOC residential customers is warranted.¹¹ The need to ensure access and benefits to those customers is made even more acute when considering that these customers are also disproportionately impacted by air pollution as Figure 1 below shows.

Figure 1: Disproportionate Exposure to Air Pollution Risk in Minnesota¹²

Air pollution risks are unequal



All types of air pollution are likely higher near your community if you are a person of color, American Indian, or have lower rent.

⁹ *Ibid.*

¹⁰ “Under-resourced” is a preferred term of several Fresh Energy partners and is used in place “low-income” where possible.

¹¹ See [letter submitted August 31, 2020](#) to the Commission on behalf of multiple organizations calling for 40 percent of benefits from COVID-19 Recovery proposals to accrue to BIPOC communities. In the letter, the organizations state the various ways in which BIPOC communities have been most impacted by the COVID-19 pandemic.

¹² Minnesota Pollution Control Agency, [“Disproportionate Impacts in Minnesota.”](#) Webpage accessed 9/20/21.

Designing the program with higher amounts of per-vehicle rebates and focusing on income-qualified customers is one step to promote the equitable distribution of program benefits. Easing programmatic barriers, like the requirement to be on a managed charging program without consideration of whether such a program is even available to a prospective rebate recipient, is another.

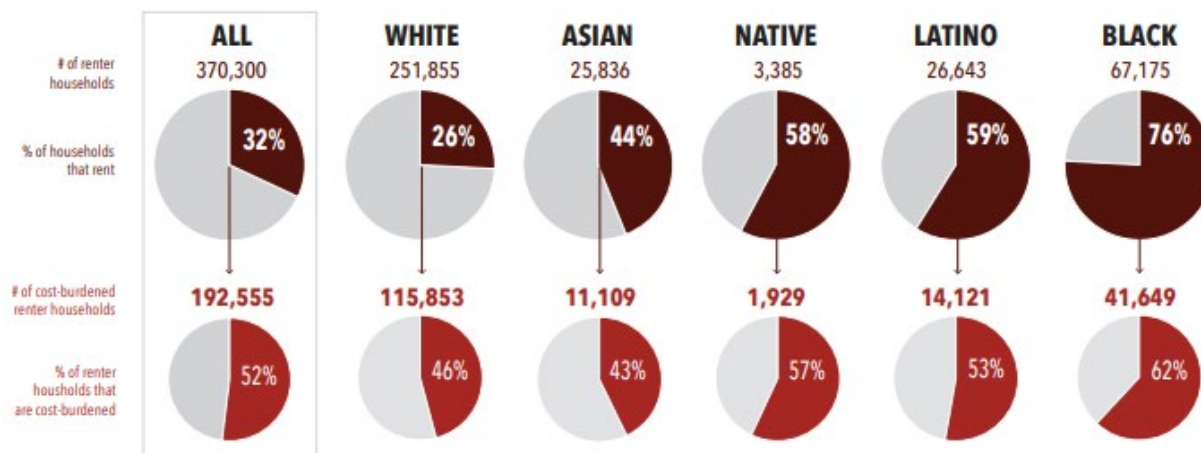
Our particular concern is that income-qualified customers are more likely to be renters and/or reside multifamily housing, two customer classes that still lack the same access to home charging as single-family homeowners do. Xcel Energy recognized this when it designed and launched its Multi-Dwelling Unit EV Charging Pilot, which is a good step towards narrowing the EV charging access gap but isn't enough by itself to ensure that income-qualified residential customers can get on a managed charging program in order to qualify for an LDEV rebate under the original proposal. Additionally, renters of single-family homes still face barriers to participating in Xcel's EV residential charging programs due to the need to have property owner approval or involvement and possible investment.

The importance of removing such a barrier becomes more pronounced when understanding the percentage of BIPOC and under-resourced customers living in rental units. Figure 2 below shows the breakdown of demographics of renters in the Twin Cities region, which Xcel Energy serves. The data in Figure 2 shows that a high proportion of renters are BIPOC, with Black households, in particular, disproportionately renting vs. owning their homes. Additionally, among renters, the percentage of "cost-burdened"¹³ households is significant. Ensuring that these households can reduce their transportation costs and have access to clean vehicles with lower lifetime costs¹⁴ could have economic benefits beyond greenhouse gas (GHG) emissions reduction or grid optimization.

¹³ "Cost burdened" refers to households spending more than 30% of their gross monthly income on housing costs. [Link](#).

¹⁴ CEGs Initial Comments at 3.

Figure 2: Demographic breakdown of Twin Cities households (2018)¹⁵



Finally, Xcel mentions that determining each prospective rebate recipients' ability to participate in a managed charging program would add administrative costs. Per the CEG's original recommendation, creating a "concierge" advisory service for prospective rebate recipients to walk through the process would be a natural fit for determining each customer's ability to get on a managed charging program. What's more, asking these questions for income-qualified customers would provide useful and actionable data on other barriers to EV access and charging that Xcel's current and proposed EV charging programs may not produce. As mentioned in our initial comments, the Colorado Public Utilities Commission recognized the importance of considering the distinct needs of income-qualified consumers.¹⁶ Thus, the administrative costs would be worth the value of the data collected, and indeed may already be included in the \$0.5 - \$1 million Xcel requested in its reply comments to create a robust community outreach and marketing effort to support the LDEV program.¹⁷

The CEGs reiterate that the LDEV rebate program should require managed charging where available for its rebate recipients and should exempt income-qualified rebate applicants from the managed requirement where those customers do not have access to such a program. It is true that planning for grid optimization now by incentivizing off-peak EV charging is important. However, it is also true that Minnesota is very early in its adoption curve and cannot afford to miss opportunities to deploy EVs, especially in a more equitable manner, at this stage. Xcel can and should continue to design and implement EV charging programs, including managed charging programs, that are accessible to more renters and multifamily

¹⁵ Minnesota Housing Partnership, "[Market Watch: Twin Cities.](#)" (Nov 2018) at 3.

¹⁶ *Id.* at 14

¹⁷ Xcel Reply at 10.

housing residents. LDEV rebate recipients who do not have access to a managed charging program can be phased into future programs when programs are available to them. Furthermore, a customer is not prohibited from practicing managed charging if that customer is not enrolled in a program that provides benefits to do so. Xcel should provide information about charging at grid-beneficial times to as part of the rebate award process.

Residential Charger Rebates

In our initial proposal, the CEGs requested that Xcel include an additional \$1.67 million to support residential charging, either by offering to cover all installation-related costs up to \$1,000 per LDEV rebate or to provide a “charge card” for rebate recipients without an option to install home charging. Xcel appreciated the intent but declined to include this additional program element as part of its LDEV rebate program, stating additional discussion was warranted and that some aspects of our proposal were surfaced in the 2021 Transportation Electrification Plan filing Xcel made earlier this summer.¹⁸

The CEGs reiterate our preference for a complementary charger rebate as part of the income-qualified LDEV rebate program in order to maximize income-qualified customer participation, per best practices referenced in our initial comments.¹⁹ However, should the Public Utilities Commission (“Commission”) choose not to approve such an income-qualified residential charger rebate program as part of Xcel’s overall LDEV rebate program approval, **we request that Commission direct Xcel to propose a residential charger program designed to support income-qualified residential customers who receive LDEV rebates within a year of the Commission’s order on this docket.**

Other LDEV Rebate Considerations

The CEGs appreciate Xcel’s support to build a robust community outreach and income-verification program and acknowledge that going above-and-beyond Xcel’s current outreach model will require additional investment.²⁰ To better understand the scope of what Xcel is considering as part of this effort, **we ask that Xcel provide a cost-breakdown of its estimated outreach and income verification budget**, including amount expect to perform income-verification, **by October 1, 2021.**

¹⁸ Xcel Reply at 11

¹⁹ CEGs Initial Comments at 14

²⁰ Xcel Reply at 10

Additionally, we support Xcel's suggestion to include discussion of additional rebates (i.e. "Phase II" rebates) as part of its 2023 Transportation Electrification Plan process.²¹ We also note that should the Commission decide to *include* non-income qualified residential customers as part of Xcel's "Phase I" rebate program, the per-vehicle rebate amounts should match Xcel's original proposal, i.e. \$2,500 for new LDEVs and \$1,250 for used LDEVs, with the minor modification of keeping per-vehicle rebates level (i.e. the same, without ratcheting down) during the initial three-year pilot operation.

Finally, on the issue of cost recovery, **we ask Xcel to provide its cost assumptions used to calculate the Net Present Values depicted in Table 2²² (e.g. short-term debt cost).**

Electric Bus Rebates

The CEGs recommended in our initial comments that \$20 million be allocated for Metro Transit to purchase electric buses, with an additional \$5 million for other transit agencies and \$5 million for school districts or school bus operators. We appreciate Xcel's openness to this pared down proposal.²³ However, we disagree with Xcel's suggestion that electric bus funds should not be earmarked for different recipient types.²⁴ Instead, earmarks for different recipients should remain, to avoid a better resourced entity like Metro Transit from claiming the entire rebate pool before other, less-resourced entities like school bus operators or smaller transit agencies have the opportunity to do so.

Additionally, keeping electric bus rebates as proposed will allow the rate of rebate claims to be tracked by recipient type, and to identify potential barriers to rebate use by non-Metro Transit agencies or school bus operators that would prove useful in a Phase II of the electric bus rebate program. For these reasons **the CEGs recommend maintaining the allocations as originally proposed, with \$20 million to Metro Transit, \$5 million to other transit agencies, and \$5 million for school bus operators or districts.**

2) Public Fast Charging Stations Proposal

The Clean Energy Groups support Xcel's proposal to build public fast charging stations in areas of its service territory currently underserved by private market participants. We also support the use of a time-varying rate to incentivize off-peak charging.

²¹ Xcel Reply at 5

²² Xcel Reply at 9

²³ Xcel Reply at 4

²⁴ Xcel Reply at 10

We do note, as we have in another docket, that charging customers “market-rate” retail rates is not necessarily supported or necessary when considering that these fast chargers are being placed in an area *not* currently served by market-rate charging stations. In other words, there is less of a need to ensure “market-competitive” rates at Xcel-owned fast charging stations when the primary motivation to build and own such charging stations is to fill a market gap, not to compete with existing or potential private market participants. Indeed, having lower-than-market retail rates could support market development in underserved areas. As in Minnesota Power’s EV Charging Infrastructure Investment, we recommend that Xcel reconsider the energy charge to customers and adapt them to reflect the underlying energy costs more closely and be cost-competitive with equivalent gasoline prices.²⁵ Specifically, the **CEGs recommend that the Commission require Xcel Energy to file an updated EV retail tariff within 90 days of the Commission’s Order to lower the energy charge to EV drivers that better reflects the actual cost of energy and provides the potential for fuel costs savings over gasoline at all company-owned DC fast charging stations.**

We also agree with Xcel and disagree with ChargePoint, Inc on the issue of site hosts setting their own pricing.²⁶ Given Xcel is owning and operating these charging stations, the Company should be in charge of setting retail rates, not the site hosts.

3) Xcel’s Own Fleet Electrification

The Clean Energy Groups support Xcel’s plan to accelerate its own fleet electrification. Doing so can provide a helpful example to other organizations seeking to electrify their vehicle fleets, and support Xcel in meeting its stated goal of electrifying 20% of light-duty vehicles by 2030 across all its service territories.²⁷

4) Conclusion and Recommendations

In conclusion, we reiterate our recommendations in our initial comments, with the following modifications:

- 1) Increase the per-vehicle rebate amount for new light-duty electric vehicle to **\$5,500** for income-qualified residential customers;

²⁵ Hanna Terwilliger, “[Staff Briefing Papers: In the Matter Minnesota Power’s Electric Vehicle Charging Infrastructure Investment](#),” (Sept 2021). Terwilliger summarizes the CEGs position on Minnesota Power’s “market rate” energy charges at 10-11.

²⁶ Xcel Reply at 14

²⁷ Xcel Reply at 5

- 2) Approve Xcel's proposed public fast charging proposal with the modification that the Commission require Xcel Energy to file an updated EV retail tariff within 90 days of the Commission's Order to lower the energy charge to EV drivers so that it better reflects the actual cost of energy and provides the potential for fuel costs savings over gasoline at all company-owned DC fast charging stations;
- 3) Approve Xcel's accelerated fleet electrification.

Thank you.

Sincerely,

/s/ Anjali Bains

Fresh Energy
408 St. Peter Street, Suite 220
St. Paul, MN 55102
651.726.7579
bains@fresh-energy.org

/s/ Sam Houston

Union of Concerned Scientists
1825 K Street NW, Suite 800
Washington, DC 20006
202.331.5459
shouston@ucsusa.org

/s/ Joseph Halso

Sierra Club
1536 Wynkoop Street, Suite 200
Denver, CO 80202
303.454.3365
joe.halso@sierraclub.org

/s/ Dean Taylor

Plug In America
6380 Wilshire Blvd, Suite 1000
Los Angeles, CA
323.372.1236
dtaylor@pluginamerica.org

CERTIFICATE OF SERVICE

I, Anjali Bains, hereby certify that I have this day, served a copy of the following document to the attached lists of persons by electronic filing and electronic mail.

Reply Comments of Fresh Energy, Union of Concerned Scientists, Sierra Club, and Plug In America

Docket No. E002/M-20-745

Dated this 20th day of September 2021

/s/Anjali Bains

Fresh Energy
408 St. Peter Street, Suite 350
St. Paul, MN 55102
651.726.7579
bains@fresh-energy.org

Electronic Service Member(s)
[Text / Last](#)

Last Name	First Name	Email	Company Name	Delivery Method	View Trade Secret
Aberle	Tamie A.	tamie.aberle@mdu.com	Great Plains Natural Gas Co.	Electronic Service	No
Ahern	Michael	ahern.michael@dorsey.com	Dorsey & Whitney, LLP	Electronic Service	No
Alvarez	Michael	Michael.Alvarez@longroadenergy.com	Community Wind North, LLC	Electronic Service	No
Anderson	Kristine	kanderson@greatermngas.com	Greater Minnesota Gas, Inc. & Greater MN Transmission, LLC	Electronic Service	No
Archer	Alison C	aarcher@misoenergy.org	MISO	Electronic Service	No
Ashley	Thomas	tom@greenlots.com	Greenlots	Electronic Service	No
Auerbacher	Kevin	kauerbacher@tesla.com	Tesla, Inc.	Electronic Service	No
Bains	Anjali	bains@fresh-energy.org	Fresh Energy	Electronic Service	No
Baumhelfner	Max	MBAUMHEFNER@NRDC.ORG	Natural Resources Defense Council	Electronic Service	No
Berninger	Carolyn	cberninger@mncenter.org	Minnesota Center for Environmental Advocacy	Electronic Service	No
Bertrand	James J.	james.bertrand@stinson.com	STINSON LLP	Electronic Service	No
Bjorklund	Brenda A.	brenda.bjorklund@centerpointenergy.com	CenterPoint Energy	Electronic Service	No
Canaday	James	james.canaday@ag.state.mn.us	Office of the Attorney General-RUD	Electronic Service	No
Chilson	Cody	cchilson@greatermngas.com	Greater Minnesota Gas, Inc. & Greater MN Transmission, LLC	Electronic Service	No
Choquette	Ray	rchoquette@agp.com	Ag Processing Inc.	Electronic Service	No
Coffman	John	john@johncoffman.net	AARP	Electronic Service	No
Commerce Attorneys	Generic Notice	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	Electronic Service	Yes
Conlin	Riley	riley.conlin@stoel.com	Stoel Rives LLP	Electronic Service	No
Cooper	Brooke	bcooper@allete.com	Minnesota Power	Electronic Service	No
Corbin	Grace	G.Corbin@mpls-synod.org	Eco-Faith Network	Electronic Service	No
Corcoran	Heidi	Heidi.Corcoran@CO.DAKOTA.MN.US	Dakota County	Electronic Service	No
Creurer	Hillary	hcreurer@allete.com	Minnesota Power	Electronic Service	No
Crocker	George	gwillc@navo.org	North American Water Office	Electronic Service	No
DenHerder Thomas	Timothy	timothy@cooperativeenergyfutures.com	Cooperative Energy Futures	Electronic Service	No
Desmond	Carrie	carrie.desmond@metrotransit.org	Metropolitan Council	Electronic Service	No
Dickinson	Elizabeth	eadickinson@mindspring.com	Community Power	Electronic Service	No
Dockter	Bridget	Bridget.Dockter@xcelenergy.com	N/A	Electronic Service	No
Doyle	Marie	marie.doyle@centerpointenergy.com	CenterPoint Energy	Electronic Service	No
Dreier	Michelle	mdreier@electricalassociation.com	N/A	Electronic Service	No
Elwood	Ron	relwood@mnlisap.org	Mid-Minnesota Legal Aid	Electronic Service	No
Erickson	James C.	jericksonkbc@gmail.com	Kelly Bay Consulting	Electronic Service	No
Farrell	John	jfarrell@ilsr.org	Institute for Local Self-Reliance	Electronic Service	No
Fehlhaber	Eric	efehlhaber@dakotaelectric.com	Dakota Electric Association	Electronic Service	No
Ferguson	Sharon	sharon.ferguson@state.mn.us	Department of Commerce	Electronic Service	No
Fuentes	Daryll	energy@usg.com	USG Corporation	Electronic Service	No
Garness	James	james.r.garness@xcelenergy.com	N/A	Electronic Service	No
Garvey	Edward	edward.garvey@AESLconsulting.com	AESL Consulting	Electronic Service	No
Gerhardson	Bruce	bgerhardson@otpc.com	Otter Tail Power Company	Electronic Service	No
Gonzalez	Janet	Janet.gonzalez@state.mn.us	Public Utilities Commission	Electronic Service	No
Grace	Anita	anita@gracemulticultural.com	GRACE Multicultural	Electronic Service	No
Grant	Bill	billgrant@minncap.org	Minnesota Community Action Partnership	Electronic Service	No
Guerrero	Todd J.	todd.guerrero@kutakrock.com	Kutak Rock LLP	Electronic Service	No
Halso	Joe	joe.halso@sierraclub.org	Sierra Club	Electronic Service	No
Harris	Matthew B	matt.b.harris@xcelenergy.com	XCEL ENERGY	Electronic Service	No
Hattestad	Erik	erik@cureriver.org	Cure River	Electronic Service	No

Havey	Kim	kim.havey@minneapolismn.gov	City of Minneapolis	Electronic Service	No
Heinen	Adam	aheinen@dakotaelectric.com	Dakota Electric Association	Electronic Service	No
Henkel	Annete	mui@mnuutilityinvestors.org	Minnesota Utility Investors	Electronic Service	No
Henriksen	Shane	shane.henriksen@enbridge.com	Enbridge Energy Company, Inc.	Electronic Service	No
Hintz	Corey	chintz@dakotaelectric.com	Dakota Electric Association	Electronic Service	No
Hoppe	Michael	lu23@ibew23.org	Local Union 23, I.B.E.W.	Electronic Service	No
Horner	MJ	mj.horner@xcelenergy.com	N/A	Electronic Service	No
Houston	Samantha	shouston@ucsusa.org	Union of Concerned Scientists	Electronic Service	No
Hoyum	Lori	lhoyum@mnpower.com	Minnesota Power	Electronic Service	No
Hummel	Holmes	Holmes.Hummel@CleanEnergyWorks.org	Clean Energy Works	Electronic Service	No
Jacobson	Travis	travis.jacobson@mdu.com	Great Plains Natural Gas Company	Electronic Service	No
Jenkins	Alan	aj@jenkinsatlaw.com	Jenkins at Law	Electronic Service	No
Johnson	Richard	Rick.Johnson@lawmoss.com	Moss & Barnett	Electronic Service	No
Johnson Phillips	Sarah	sarah.phillips@stoel.com	Stoel Rives LLP	Electronic Service	No
Jordan	Brendan	bjordan@gpsid.org	Great Plains Institute & Bioeconomy Coalition of MN	Electronic Service	No
Karels	Stacey	skarels@ocal563.org	Mankato Area Bldg & Construction Trades Council	Electronic Service	No
Kaufman	Mark J.	mkaufman@ibewlocal949.org	IBEW Local Union 949	Electronic Service	No
Koehler	Thomas	TGK@IBEW160.org	Local Union #160, IBEW	Electronic Service	No
Kohlasch	Frank	frank.kohlasch@state.mn.us	MN Pollution Control Agency	Electronic Service	No
Krikava	Michael	mkrikava@taftlaw.com	Taft Stettinius & Hollister LLP	Electronic Service	No
Kupser	Nicolle	nkupser@greatermngas.com	Greater Minnesota Gas, Inc. & Greater MN Transmission, LLC	Electronic Service	No
Larson	James D.	james.larson@avantenergy.com	Avant Energy Services	Electronic Service	No
Larson	Peder	plarson@larkinhoffman.com	Larkin Hoffman Daly & Lindgren, Ltd.	Electronic Service	No
Lee	Amber	Amber.Lee@centerpointenergy.com	CenterPoint Energy	Electronic Service	No
Levenson Falk	Annie	annief@cupminnesota.org	Citizens Utility Board of Minnesota	Electronic Service	No
Long	Ryan	ryan.j.long@xcelenergy.com	Xcel Energy	Electronic Service	No
Ludwig	Susan	sludwig@mnpower.com	Minnesota Power	Electronic Service	No
Maini	Kavita	kmaini@wi.rr.com	KM Energy Consulting, LLC	Electronic Service	No
Marshall	Pam	pam@energycents.org	Energy CENTS Coalition	Electronic Service	No
Meloy	Brian	brian.meloy@stinson.com	STINSON LLP	Electronic Service	No
Meyer	Joseph	joseph.meyer@ag.state.mn.us	Office of the Attorney General-RUD	Electronic Service	No
Miller	Kevin	kevin.miller@chargepoint.com	ChargePoint, Inc.	Electronic Service	No
Miller	Stacy	stacy.miller@minneapolismn.gov	City of Minneapolis	Electronic Service	No
Moeller	David	dmoeller@allete.com	Minnesota Power	Electronic Service	No
Monbouquette	Marc	marc.monbouquette@enel.com	Enel X North America, Inc.	Electronic Service	No
Moratka	Andrew	andrew.moratka@stoel.com	Stoel Rives LLP	Electronic Service	No
Nabong	Mark	mabong@nrdc.org	Natural Resources Defense Council	Electronic Service	No
Niles	David	david.niles@avantenergy.com	Minnesota Municipal Power Agency	Electronic Service	No
Noble	Michael	noble@fresh-energy.org	Fresh Energy	Electronic Service	No
Norris	Samantha	samanthanorris@alliantenergy.com	Interstate Power and Light Company	Electronic Service	No
O'Reilly	Nate	nate@iron512.com	Ironworkers Local #512	Electronic Service	No
Olsen	Matthew	molsen@otpc.com	Otter Tail Power Company	Electronic Service	No
Opatz	Debra	dopatz@otpc.com	Otter Tail Power Company	Electronic Service	No
Overland	Carol A.	overland@legalelectric.org	Legalelectric - Overland Law Office	Electronic Service	No
Pacheco	John	johnpachecojr@gmail.com	N/A	Electronic Service	No
Palmer	Greg	gpalmer@greatermngas.com	Greater Minnesota Gas, Inc. & Greater MN Transmission, LLC	Electronic Service	No
Passer	Ben	Passer@fresh-energy.org	Fresh Energy	Electronic Service	No
Perez	Jose	jose@hispanicsinenergy.com	N/A	Electronic Service	No
Peterson	Jennifer	jjpeterson@mnpower.com	Minnesota Power	Electronic Service	No
Phillips	Catherine	Catherine.Phillips@wecenergygroup.com	Minnesota Energy Resources	Electronic Service	No
Podratz	Marcia	mpodratz@mnpower.com	Minnesota Power	Electronic Service	No
Pranis	Kevin	kpranis@iunagroc.com	Laborers' District Council of MN and ND	Electronic Service	No
Prazak	David G.	dprazak@otpc.com	Otter Tail Power Company	Electronic Service	No
Residential Utilities Division	Generic Notice	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	Electronic Service	Yes
Reuther	Kevin	kreuther@mncenter.org	MN Center for Environmental Advocacy	Electronic Service	No