

November 6, 2025

Sasha Bergman  
Executive Secretary  
Minnesota Public Utilities Commission  
121 7th Place East, Suite 350  
St. Paul, Minnesota 55101-2147

RE: Comments of the Minnesota Department of Commerce  
Docket No. E002/M-25-27

Dear Ms. Bergman:

Attached are the supplemental comments of the Minnesota Department of Commerce (Department) in the following matter:

*Xcel Energy's 2024 Annual Safety, Reliability, and Service Quality Standards Report and Proposed SAIFI, SAIDI, and CAIDI Reliability Standards for 2024.*

The Report was filed by Xcel Energy (Xcel or the Company) on April 1, 2025. The Minnesota Department of Commerce (Department) filed its initial comments on July 15, 2025, and requested additional information from Xcel. Xcel filed its reply comments on August 8, 2025. These comments address the additional information provided by Xcel in response to the Department's Initial Comments.

The Department recommends the Commission accept Xcel's 2024 Safety Report and 2024 Service Quality Report. The Department withholds its final recommendation on Xcel's 2024 Reliability, and Service Quality Standards Report, pending its review of Xcel's response to the IEEE benchmarking results.

Sincerely,

/s/ Dr. SYDNIE LIEB  
Assistant Commissioner of Regulatory Analysis

JK/RW/ar  
Attachment

## Before the Minnesota Public Utilities Commission

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### Comments of the Minnesota Department of Commerce

Docket No. E002/M-25-27

#### I. INTRODUCTION

On April 1, 2025, Northern States Power Company d/b/a Xcel Energy (Xcel or the Company) filed its 2024 Annual Safety, Reliability and Service Quality Standards Report (2024 SRSQ Report or Annual Report) in Docket No. E002/M-25-27 in compliance with the Public Utilities Commission (Commission) orders and the requirements of Minnesota Rules Chapter 7826. Minnesota’s electric utilities have been filing these annual reports since at least 2009. The information in the Annual SRSQ Report provides an overview of the utility’s operational performance for the previous year. It is also the filing in which the Commission determines an electric utility’s reliability goals for the following year.

#### II. PROCEDURAL BACKGROUND

April 1, 2025	Xcel filed its 2024 SRSQ Report. <sup>1</sup>
April 7, 2025	Xcel filed an erratum that included updated Tables 28 and 29. <sup>2</sup>
April 7, 2025	The Commission filed a notice of comment period on Phase 1 of Xcel’s Safety, Reliability, and Service Quality Report Proceedings. The scope of the Notice was Xcel’s remote reconnection proposals during extreme heat events and poor air quality alerts required by the Commission’s January 13, 2025, Order in Docket No. E-002/M-24-27. <sup>3</sup>
April 30, 2025	The Commission issued a notice of comment period for the review of Xcel’s SRSQ Report. <sup>4</sup> The present comments address this notice of comment.

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<sup>1</sup> *In the Matter of Northern States Power Company d/b/a Xcel Energy—Electric’s 2024 Annual Safety, Reliability, and Service Quality Report*, Xcel Energy, SRSQ Report (all parts), April 1, 2025, Docket No. E002/M-25-27, (eDockets) [20254-217138-01](#), [20254-217138-03](#), and [20254-217138-05](#).

<sup>2</sup> *In the Matter of Northern States Power Company d/b/a Xcel Energy—Electric’s 2024 Annual Safety, Reliability, and Service Quality Report*, Xcel Energy, Errata Letter, April 7, 2025, Docket No. E002/M-25-27, (eDockets) [20254-217326-01](#).

<sup>3</sup> *In the Matter of Northern States Power Company d/b/a Xcel Energy—Electric’s 2024 Annual Safety, Reliability, and Service Quality Report*, *Notice of Comment Period on Phase 1 of Xcel Energy’s 2024 Safety, Reliability, and Service Quality Report Proceedings*, April 7, 2025, Docket No. E002/M-25-27, (eDockets) [20254-217296-01](#).

<sup>4</sup> *In the Matter of Northern States Power Company d/b/a Xcel Energy—Electric’s 2024 Annual Safety, Reliability, and Service Quality Report*, *Notice of Comment Period on 2024 Electric Safety, Reliability, and Service Quality Reports*, April 30, 2025, Docket No. E002/M-25-27, (eDockets) [20254-218387-01](#), (hereinafter “Commission Notice”).

- July 11, 2025                      The Environmental Law and Policy Center, and the Building Owners and Managers Association of Greater Minneapolis filed initial comments on the present matter.
- July 15, 2025                      The Department filed its initial comments in the present matter.<sup>5</sup>
- August 8, 2025                    Xcel Energy filed reply comments on the present matter.<sup>6</sup>

Topic(s) open for comment:

- Should the Commission accept the Electric Utilities’ 2024 Annual Safety, Reliability, and Service Quality (SRSQ) Reports?
- Should the Commission approve Xcel Energy’s request for a variance to Minn. Rule 7820.2500 to perform remote disconnections without a site visit?
- Are there other issues or concerns related to this matter?

### III. DEPARTMENT ANALYSIS

The Department requested additional information from Xcel in its initial comments. Xcel provided responses in its reply comments. The Department appreciates Xcel’s responses.

#### A. RESPONSE TO NOTICE TOPICS

##### A.1. Accept the Report

The Department responds to the following Notice topic:

*Should the Commission accept the Electric Utilities’ 2024 Annual Safety, Reliability, and Service Quality (SRSQ) Reports?*

The Department reserves its final recommendation on the Xcel’s 2024 Service Reliability Report until IEEE has provided the information necessary to fulfill the Commission’s reliability-related reporting requirements. The Department provides its recommendations regarding Xcel’s 2024 Annual Safety and 2024 Service Reliability Reports below.

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<sup>5</sup> *In the Matter of Northern States Power Company d/b/a Xcel Energy—Electric’s 2024 Annual Safety, Reliability, and Service Quality Report*, Department Initial Comments, July 15, 2025, Docket No. E002/M-25-27, (eDockets) [20257-221024-01](#), (hereinafter “Department Initial Comments”).

<sup>6</sup> *In the Matter of Northern States Power Company d/b/a Xcel Energy—Electric’s 2024 Annual Safety, Reliability, and Service Quality Report*, Xcel Energy Reply Comments, August 8, 2025, Docket No. E002/M-25-27, (eDockets) [20258-221894-1](#), (hereinafter “Xcel Reply Comments”).

*A.2. Variance to Minn. Rule 7820.2500*

The Department responds to the following Notice topic:

*Should the Commission approve Xcel Energy's request for a variance to Minn. Rule 7820.2500 to perform remote disconnections without a site visit?*

As stated in initial comments, the Department recommends the commission approve the Company's request for a variance from Minn. R. 7820.2500.<sup>7</sup>

*A.3. Status of IEEE Reporting of 2024 Reliability Data*

IEEE's Distribution Reliability Working Group (DRWG) presented its initial results for Benchmark Year 2025 Results for 2024 Data on August 15, 2025.<sup>8</sup> Unfortunately, IEEE only published summary information for all the electric utility reporting reliability information. Order Point 6 of the Commission's Order in Xcel's 2023 SRSQ delineates the requirements for the Company's 2024 specific reliability standards:

Xcel's 2024 statewide reliability Standard is set at the IEEE benchmarking second Quartile for large utilities. Xcel's Southeast and Northwest work center reliability standards are set at the IEEE benchmark second quartile for medium utilities. Xcel's Metro East and Metro West work center reliability standards are set at the IEEE benchmarking second quartile for large utilities.<sup>9</sup>

Hence, the Commission's Order requires that the 2024 IEEE Reliability Benchmarks be calculated by utility size. To the Department's knowledge, IEEE has not yet published this information. Until IEEE's DRWG staff provide this information, Xcel cannot complete its reliability-related supplemental filing. Nor can the Department review Xcel's reliability-related supplemental filing.

Department staff have asked IEEE staff involved with this effort to provide this information. It is also the Department's understanding that Xcel has made the same request to IEEE staff as well. Thus, the Department cannot forward its final recommendation regarding Xcel's 2024 Reliability Report until it has received and reviewed that information. The Department notes it will provide its analysis and recommendation as quickly as possible after receiving said information.

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<sup>7</sup> Department Initial Comments, at 82.

<sup>8</sup> See [IEEE DRWG 2024 Results](#).

<sup>9</sup> *In the Matter of Xcel Energy's 2024 Safety, Reliability and Service Quality Standards Report*, PUC Order, January 13, 2025, Docket No. E002/M-24-27 at Order Points 19, 22, 23, 24, 26, 27, 28, 29, 30, and 34 (eDockets) [20251-213880-01](#) (hereinafter "2023 SRSQ Order").

*A.4. Other Issues*

The Department responds to the following Notice topic:

*Are there other issues or concerns related to this matter?*

In initial comments, the Department requested additional information from Xcel related to several reporting requirements. The responses from Xcel are discussed in the subsequent sections. Headings and subheadings of the following sections mirror those used in initial comments.

*B. ANNUAL SAFETY REPORT*

*B.2. Summary of Property Claims Damages*

At B.2. of initial comments, the Department requested that Xcel, in reply comments, provide additional information on its efforts to minimize damages from claims.<sup>10</sup>

The Company noted in its response:

Recent year claim totals have been significantly lower as the pandemic created a timing lag for larger litigated claims. These larger claims are beginning to be settled as Minnesota's six-year statute of limitations is approaching.<sup>11</sup>

The Department checked the information in Table 2 of its comments to determine if Xcel's statement was correct. The 2020-2023 average of the Total Amount Paid was \$257,033. The 2016-2019 average of that same category was \$399,567. It appears the data supports Xcel statement.

Consequently, the Department has no additional comments on this issue. The Department recommends the Commission accept Xcel's 2024 Safety Report.

*C. ANNUAL RELIABILITY REPORT—RULES BASED REPORTING REQUIREMENTS*

*C.5. Major Service Interruptions*

At C.5. of initial comments, the Department requested Xcel, in reply comments, discuss potential process improvements to improve the Company's performance relative to having Control Center staff email the CAG so that CAG can notify the Commission's Consumer Affairs Office.<sup>12</sup>

Xcel's response explained that the correct number of Major Service Interruptions not reported to CAO in 2024 was 66, not the 118 outages the Company identified in the Petition.<sup>13</sup> The Company noted that

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

<sup>11</sup> Xcel Reply Comments at 2.

<sup>12</sup> Department Initial Comments, at 15.

<sup>13</sup> Xcel Reply Comments at 3.

its review also identified some of the outages that were reported to CAO did not meet the definition of Major Service Interruption. Xcel states it will initiate process improvements related to Operational Review, Automation and Data Reconciliation to remedy this issue. The Company also provided an updated Attachment O that included those 66 Major Service Interruptions.

The Department has no further comments but will monitor this situation on an ongoing basis.

*D. ANNUAL RELIABILITY REPORT—ORDER BASED REPORTING REQUIREMENTS*

Order points three and four of the Commission’s Order addressing Xcel’s 2013 SRSQ added the following requirements to the Company’s subsequent reports:

3. Required Xcel to augment its next filing to include a description of the policies, procedures and actions that it has implemented, and plans to implement, to assure reliability, including information on how it is demonstrating pro-active management of the system, increased reliability, and active contingency planning.

4. Required Xcel to incorporate into its next filing a summary table that allows the reader to more easily assess the overall reliability of the system and identify the main factors that affect reliability.<sup>14</sup>

Xcel provided a description of its reliability program development in Attachment J of its SRSQ Report—one of the programs discussed was its vegetation management program.<sup>15</sup> At D.1.2. of initial comments, the Department requested that Xcel, in reply comments, include an explanation of the Company’s rationale for: 1) not increasing the budget for the Vegetation Management Program beginning in 2022 when it was apparent that the program’s labor costs were increasing at a rate well above inflation; and, 2) why Xcel allowed the number of miles trimmed under the program decline from 2019 to 2024.<sup>16</sup>

Xcel included a discussion of the history of its vegetation management program since 2019 and provided some context as to why the number of miles trimmed under the program declined during that period.<sup>17</sup> The Company attributed some of this decline to the effects of the pandemic in 2020 and the pandemic’s lingering effects. Xcel also noted that it was requesting an increase in its vegetation management budget in its current rate case.<sup>18</sup> The Department appreciates the information the Company provided and has no further comment on this issue.

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<sup>14</sup> *In the Matter of Xcel Energy’s 2013 Safety, Reliability and Service Quality Standards Report and Proposed Annual Reliability Standards for 2014, Order*, December 12, 2014, Docket No. E002/M-14-131 (eDockets) [201412-105351-01](#) at Order Points 3 and 4 (hereinafter “2013 SRSQ Order”).

<sup>15</sup> Petition at Attachment J at 1.

<sup>16</sup> Department Initial Comments, at 23.

<sup>17</sup> Xcel Reply Comments, at 4–5.

<sup>18</sup> *Ibid.* at 6.

Next, the Commission identified eleven reliability-related reporting requirements in Xcel's 2021 SRSQ Order.<sup>19</sup> In initial comments, the Department addressed them in the order presented in the 2021 SRSQ Order.<sup>20</sup> At D.2.4.9. of initial comments, regarding performance and reliability factors by customer class, the Department requested that Xcel, in reply comments, provide the analysis underlying the performance and reliability factors by customer class included in Table 14B.<sup>21</sup>

Xcel provided a chart that provided additional detail regarding the functional location by percentage by customer class for SAIDI minutes.<sup>22</sup> The functional locations identified were Feeder and Above, Tap and Below Underground and Tap and Below Overhead. The Feeder and Above level should similar SAIDI values for the three customer classes included (Residential, Commercial and Industrial). For Tap and Below Overhead, the Residential, Commercial, and Industrial classes SAIDI's declined from 51.1 to 35.9 to 24.1. Thus, industrial customers experienced 24.1 minutes of SAIDI in 2024, while residential customers endured 51.1 minutes of outages. Commercial customers SAIDI value for 2024 fell in-between the other two classes at 35.9 minutes. These results could be due to correlation between customer density to overhead outages, a point Xcel has repeated over the years. As for the Tap and Below Underground, the SAIDI values for residential and commercial classes were very similar, while that for the industrial class was noticeably higher (11.9, 11.6 and 18.9 minutes in 2024, respectively). These results are not consistent with Xcel's customer/size density argument. The Department will not speculate as to why this difference exists but will continue to monitor this issue. The Department appreciates the information the Company provided and has no further comment on this issue.

*E. ANNUAL SERVICE QUALITY REPORT—RULES BASED REPORTING REQUIREMENTS*

*E.3. Service Extension Request Response Times*

Minn. R. 7826.1600 states that:

The annual service quality report must include a report on service extension request response times, including, for each customer class and each calendar month:

A. the number of customers requesting service to a location not previously served by the utility and the intervals between the date service was installed and the later of the in-service date requested by the customer or the date the premises were ready for service; and

B. the number of customers requesting service to a location previously served by the utility, but not served at the time of the request, and the intervals between the date service was installed

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<sup>19</sup> 2021 SRSQ Order, at Order Point 4.

<sup>20</sup> Department Initial Comments, at subsection D.2.4.

<sup>21</sup> Department Initial Comments, at 28.

<sup>22</sup> Xcel Reply Comments, at 7.

and the later of the in-service date requested by the customer or the date the premises were ready for service.<sup>23</sup>

At E.3. of initial comments, the Department requested Xcel, in reply comments, confirm or correct the Department's interpretation of the information provided in Tables 2C and 2D of the Petition.<sup>24</sup> In its reply comments, Xcel confirms the Department's interpretation of the information provided in tables 2C and 2D of the Report.<sup>25</sup>

The Department concludes Xcel complied with the reporting requirement.

*F. ANNUAL SERVICE QUALITY REPORT—ORDER BASED REPORTING REQUIREMENTS*

*F.5. Remote Disconnection Variance Order Reporting Requirements*

At F.5.2.7. in initial comments, the Department requested that Xcel, in its reply comments, provide an update on its plan and timeline for implementing texting capabilities for customer contact.<sup>26</sup>

The Company states it is continuing work on implementing one-way texting capabilities for customer communications.<sup>27</sup> The Company states two-way text communications to complete a reconnection have been put on hold to shift resources to the process for customer communication related to reconnection in an extreme heat or Air Quality Index (AQI) event.<sup>28</sup> The Company states that the Commission Ordered the AQI and extreme heat measures to be put in place significantly ahead of the Company's proposed timeline and the advanced timeline will necessitate reallocating resources.<sup>29</sup> The Department has no further comments on this issue and recommends the Commission accept Xcel's update on implementing texting capabilities for customer contact.

At F.5.2.8. in initial comments, the Department requested that Xcel, in reply comments, expand on its explanation about the complexities of direct submission of its Medically Necessary Equipment & Emergency Certification form. Specifically, the Department was concerned about the hesitancy of the Company to employ a direct link on its website.<sup>30</sup>

The Company states that the Medically Necessary Equipment & Emergency Certification form cannot be filled out by the customer alone and requires the signature of a medical professional.<sup>31</sup> Therefore, the Company has not provided a direct submittal link but provides a direct link to download the form.<sup>32</sup>

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<sup>23</sup> [Minn. R. 7826.1600](#)

<sup>24</sup> *Id.*, at 38.

<sup>25</sup> Xcel Reply Comments, at 8.

<sup>26</sup> Department Initial Comments, at 54-55.

<sup>27</sup> Xcel Reply Comments, at 8.

<sup>28</sup> *Ibid.*

<sup>29</sup> *Ibid.*

<sup>30</sup> Department Initial Comments, at 55

<sup>31</sup> Xcel Reply Comments, at 9

<sup>32</sup> *Ibid.*

Xcel states most medical offices prefer faxing documents for HIPAA reasons.<sup>33</sup> The Company stated that it is awaiting updates to its website platform that may allow direct submission of the form, however, a medical professional would still need to sign and submit for the customer.<sup>34</sup>

The Department appreciates this additional information and notes that one change to the process could lighten the customer lift in submitting a Medically Necessary Equipment & Emergency Certification form. While the Company awaits the update to its website platform, the Company could require the customer to identify their medical professional on the form and indicate that they allow Xcel to contact their medical professional for a signature for the document. However, the Department is not an expert on Health Insurance Portability and Accountability Act (HIPAA) regulations and is thus unsure if the utility reaching out a medical provider for confirmation that the customer is in need of medically necessary service would constitute a HIPPA violation. The Department recommends the Commission require Xcel to evaluate whether it could allow a customer to complete its Medically Necessary Equipment & Emergency Certification form and indicate that Xcel may reach out to their medical provider to confirm need for medically necessary service within its next annual SRSQ report, to be filed April 1, 2026.

*G. PART 3 OF 3 OF XCEL'S PETITION—ORDER POINTS THAT REPRESENT NEW REPORTING REQUIREMENTS FROM THE 2023 SRSQ ORDER*

*G.1. Order Point 6—2024 Reliability Goals<sup>35</sup>*

*6. Xcel's 2024 statewide Reliability Standard is set at the IEEE benchmarking second Quartile for large utilities. Xcel's Southeast and Northwest work center reliability standards are set at the IEEE benchmarking second quartile for medium utilities. Xcel's Metro East and Metro West work center reliability center standards are set at the IEEE benchmarking second quartile for large utilities.*

The Department will provide a recommendation on the Company's 2024 Reliability Report and its 2025 reliability goals after reviewing Xcel's supplemental filing on the IEEE 2024 report on benchmarking data that the Company will file later in 2025.<sup>36</sup>

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<sup>33</sup> *Ibid.*

<sup>34</sup> *Ibid.*

<sup>35</sup> *In the Matter of Xcel Energy's 2024 Safety, Reliability and Service Quality Standards Report, Order Accepting Reports and Setting Additional Requirements*, January 13, 2025, Docket No. E002/M-24-27, (eDockets) [20251-213880-01](#) (hereinafter "2023 SRSQ Order") at Order Point 6.

<sup>36</sup> Department Initial Comments, at 57.

*G.2. Order Point 7—2024 IEEE reliability benchmarks<sup>37</sup>*

*7. Xcel must file a supplement to its 2024 safety, reliability, and service quality report 30 days after IEEE publishes the 2024 benchmarking results, with an explanation for any standards the utility did not meet.*

The Department will provide a recommendation on the Company's 2024 Reliability Report and its 2025 reliability goals after reviewing Xcel's supplemental filing on the IEEE 2024 report on benchmarking data that the Company will file later in 2025.<sup>38</sup>

*G.6. Order Point 19—Remote disconnection threshold<sup>39</sup>*

*19. The Commission increases the existing threshold of final contact for disconnection by requiring Xcel to use two methods of electronic communication, including either text message or email in addition to voicemail where the Company has received customer consent to do so.*

At G.6. in initial comments, the Department requested that Xcel, in reply comments, provide an update on its status of adding an additional electronic, final contact method for pending disconnections.<sup>40</sup>

The Company states additional, final contact methods have been implemented and are currently in use. The Company states it uses text messaging or e-mail notification where the customer has consented for it to do so.<sup>41</sup>

The Department concludes the Company has complied with the reporting requirement of this order point.

*G.7. Order Point 21—Affordability program outreach<sup>42</sup>*

*21. Xcel must perform additional outreach throughout its service territory with the goal of increasing participation in affordability programs that reduce bad debt.*

At G.7. in initial comments, the Department requested that Xcel, in reply comments, compare the number of outreach campaigns completed in 2024 to the number of campaigns completed in prior years as well as to provide a summary of any lessons learned from the outreach campaigns.<sup>43</sup>

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<sup>37</sup> 2023 SRSQ Order at Order Point 7.

<sup>38</sup> *Ibid.*

<sup>39</sup> 2023 SRSQ Order, at Order Point 19.

<sup>40</sup> *Id.*, at 59.

<sup>41</sup> Xcel Reply Comments, at 10.

<sup>42</sup> 2023 SRSQ Order, at Order Point 21.

<sup>43</sup> *Department Initial Comments*, at 59-60.

The Company provided additional information regarding its outreach campaigns stating that the number of campaigns completed in 2024 represents the second-highest year of campaigns to date, following 2023.<sup>44</sup> The Company stated its Personal Accounts organization adapted and began creating smaller, more tailored outreach for customers facing a threat of disconnection.<sup>45</sup> The Company worked with Hennepin County to employ a “personal touch” or “concierge”-style campaign focused on a smaller group of customers that have attempted to apply for energy assistance, but were denied due to missing information or income eligibility issues.<sup>46</sup> The Company states:

Our analysis shows that customers who are contacted through three campaigns, including at least two different methods, are most likely to complete an energy assistance application. Adoption rates for outreach campaigns in general are between 4 and 6 percent, but some “concierge” style campaigns achieve over 10 percent adoption.<sup>47</sup>

The Department concludes the Company complied with the reporting requirement of this Order Point.

*G.11. Order Point 25—Requesting medical protections<sup>48</sup>*

*25. Xcel must conduct additional outreach and provide customers with information about how to request medical protections if they are particularly vulnerable to poor air quality.*

At G.11. in initial comments, the Department requested that Xcel, in reply comments, propose a plan to proactively provide information regarding medical protections (before a customer faces disconnection or calls for help).<sup>49</sup>

The Company addresses the Department’s concern in two parts: first, its efforts to inform all customers of medical protections (whether or not they are facing disconnection or already disconnected), and second, the recently approved plans to implement reconnections and suspend disconnections during instances of extreme heat or poor air quality.

The Company states it agrees with the Department on the value of proactively informing all customers of the medical protections available to them. The Company states:

This is currently taking place in all of our outreach efforts for customers who are in danger of disconnection, as well as an annual bill insert to all residential customers advising on the medical protections and affordability programs. In addition to these outreach efforts, the Company is proposing additional outreach to medical offices to provide the Medically Necessary

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<sup>44</sup> Xcel Reply Comments, at 10-11.

<sup>45</sup> *Id.*, at 11.

<sup>46</sup> *Ibid.*

<sup>47</sup> *Ibid.*

<sup>48</sup> 2023 SRSQ Order, at Order Point 25.

<sup>49</sup> Department Initial Comments, at 62.

Equipment & Emergency Certification Form and additional education on protections available, as well as in-person events to be scheduled in the communities we serve to provide education on energy assistance, the Company's own affordability programs, and medical protections.<sup>50</sup>

Further, on the AQI and extreme heat issues, the Company states that as ordered by the Commission in its July 25, 2025 Order,<sup>51</sup> all customers—whether or not they are particularly vulnerable—will be protected from disconnection and, if disconnected, will be reconnected temporarily for the duration of the heat or AQI event.<sup>52</sup> The Company also states that the Commission ordered the Company to “post on its website an overview of extreme heat and air quality protections and the steps customers must take to secure reconnection of service.”<sup>53</sup>

The Company states:

The Company agrees that both types of customer outreach – on medical protections available at all times, and on the new heat/AQI event protections available starting May 2026 – are important. We will continue proactive efforts to make sure customers are aware of these protections.<sup>54</sup>

The Department appreciates the Company's stated commitment to proactively informing its customers of the medical protections available to them at all times as well as the protections for poor air quality and extreme heat recently approved by the Commission. The Department concludes the Company complied with the reporting requirements of this Order Point.

*G.17. Order Point 31—Policy Evaluations<sup>55</sup>*

*31.b. A proposal to increase the number of customers receiving pre-weatherization, weatherization, and energy efficiency improvements, including deep retrofits to create greater energy savings, in areas within the Company's service territory with high energy burden. The proposal should include year over year targets designed to increase the number of people receiving energy efficiency measures.*

At G.17 in initial comments, addressing Order Point 31.b., the Department requested that Xcel, in reply comments, advance “a proposal to increase the number of customers receiving pre-weatherization, weatherization, and energy efficiency improvements, including deep retrofits to create greater energy

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<sup>50</sup> Xcel Reply Comments, at 12

<sup>51</sup> *In the Matter of Northern States Power Co. d/b/a Xcel Energy's 2024 Annual Safety, Reliability, and Service Quality Report, Order, July 25, 2025, Docket No. E002/M-25-27, (eDockets) [20257-221406-01](#) (hereinafter “AQI and Extreme Heat Order”).*

<sup>52</sup> Xcel Reply Comments, at 12-13.

<sup>53</sup> AQI and Extreme Heat Order, at Order Point 11.

<sup>54</sup> Xcel Reply Comments, at 13.

<sup>55</sup> 2023 SRSQ Order, at Order Point 31

savings, in areas within the Company's service territory with high energy burden," as originally ordered at Order Point 31.b.<sup>56</sup>

The Company states it will file a proposal to satisfy this requirement in its next ECO Triennial Plan filed June 1, 2026, for the Department's consideration. The Company states it also plans to provide support for pre-weatherization, weatherization, and energy efficiency improvements in areas of high energy burden in the Company's Natural Gas Innovation Plan, via a proposed pilot for strategic electrification, building envelope, energy efficiency and/or deep weatherization for low-income customers.<sup>57</sup>

The Department will review the Company's proposed plans in its ECO Triennial Plan and its Natural Gas Innovation Plan.

Further, in addressing the Company's response to order point 31.c., which requires Xcel to evaluate a more robust hot weather rule to prevent disconnections in months with the highest cooling energy burden,<sup>58</sup> the Department requested that Xcel, in reply comments, further explain its concern regarding the impact additional months of disconnection suspension may have on the increased need for energy assistance funding and the potential for more customers to experience hardship.<sup>59</sup>

The Company states it is concerned that additional months of moratorium on disconnections during the hot weather months will dissuade customers from engaging with Xcel to pay down arrears balances which will in turn lead to customers getting farther behind on their bills.<sup>60</sup> The Company states that a customer responding to the Company when the customer is near disconnection is one of the primary opportunities the Company has to inform the customer of energy assistance and the Company's affordability programs.<sup>61</sup> The Company explains that a high past due customer balance may also lead to an increased need for energy assistance.<sup>62</sup>

While the Department recognizes the Company's concerns regarding the loss of a contact touchpoint before disconnection if disconnections are unallowed, the Department does not believe the concern is sufficient to avoid implementation of a hot weather rule to protect Minnesotans from the risks of the hottest months of the year. Simply, the Minnesota State Hazard Mitigation Plan states that heat-related illness directly accounted for 75 deaths in Minnesota from 2000-2022; Minnesotans will continue to experience a wide range of impacts from the increased frequency and severity of extreme heat events.<sup>63</sup>

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<sup>56</sup> *Id.*, at 66.

<sup>57</sup> Xcel Reply comments, at 14.

<sup>58</sup> 2023 SRSQ Order, at Order Point 31.c.

<sup>59</sup> Department Initial Comments, at 67.

<sup>60</sup> Xcel Reply Comments, at 15.

<sup>61</sup> Xcel Reply Comments, at 15.

<sup>62</sup> *Ibid.*

<sup>63</sup> Department of Public Safety, Division of Homeland Security and Emergency Management, *Minnesota State Hazard Mitigation Plan 2024*, March 13, 2024, Retrieved from: [MN State Hazard Mitigation Plan 2024.pdf](#), Accessed on: October 29, 2025 (hereinafter "MN Hazard Mitigation Plan"), at 35-36.

As discussed in the Department’s comments regarding the suspension of disconnections and the use of Xcel’s AMI to remotely reconnect involuntarily disconnected customers in instances of extreme heat or high Air Quality Index (AQI),<sup>64</sup> the World Health Organization states that heat stress is a leading cause of weather-related deaths, exacerbating many underlying health conditions such as cardiovascular disease, diabetes, mental health, asthma, and potentially increasing the risk of accidents and transmission of some infectious diseases.<sup>65</sup> Furthermore, The inability of a person to regulate their internal temperature and limit heat gain due to exposure to environmental heat stress (e.g. high temperatures, high humidity, low wind, high thermal radiation, etc.) puts enormous stress on the body—particularly on the heart and kidneys while the body tries to cool itself. “Deaths and hospitalizations triggered by extreme hot weather occur rapidly (same day and following days), which means interventions also need to be rapid when a heat alert is issued.”<sup>66</sup>

Additionally, from a CDC article published in 2024 examining heat-related emergency department visits during what were record-breaking high temperatures of 2023 for many regions of the United States:

Effective implementation of heat mitigation strategies is associated with social determinants of health. For example, even in areas with high rates of air conditioning, such as the South and southeastern United States, persons exposed to extreme heat might have limited or no access to cooling spaces. Factors that affect air conditioning use and access to cooling spaces include energy costs and the occurrence of outages due to power grid failure... [P]rograms that provide financial assistance for residential energy and monitor the safety of persons reliant on electricity-dependent durable medical equipment in case of power outages during extreme heat can protect populations affected by heat stress.<sup>67</sup>

While the AQI and extreme heat reconnection programs recently approved by the Commission in the present docket<sup>68</sup> address specific heat-related events throughout the year (extreme heat events called by the National Weather Service), the Department believes a portfolio of protections for the months with the highest cooling burden will best protect Minnesotans from the harm of extreme heat. A hot weather rule would provide protection from disconnection in the months where air cooling equipment is most important for health and safety of Minnesotans regardless of AQI or extreme heat alert issuance. Noting that the Cold Weather Rule, which could be reasonably considered parallel to a potential hot weather rule, is relatively detailed in its components (such as the utility obligations before and during the period, payment arrangements, income verification, prohibitions, disputes,

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<sup>64</sup> *In the Matter of Northern States Power Company d/b/a Xcel Energy – Electric’s 2024 Annual Safety, Reliability, and Service Quality Report*, Minnesota Department of Commerce, Initial Comments – AQI and Extreme Heat, May 9, 2025, Docket No. E002/M-25-27, (eDockets) [20255-218769-01](#) (hereinafter: Department Initial Comments – AQI and Extreme Heat) at 6-7.

<sup>65</sup> World Health Organization (28 May 2024) Heat and Health. Retrieved from: [Heat and health](#)

<sup>66</sup> *Ibid.*

<sup>67</sup> Vaidyanathan A, Gates A, Brown C, Prezzato E, Bernstein A. Heat-Related Emergency Department Visits — United States, May–September 2023. *MMWR Morb Mortal Wkly Rep* 2024;73:324–329.

DOI: <http://dx.doi.org/10.15585/mmwr.mm7315a1>

<sup>68</sup> *In the Matter of Northern States Power Co. d/b/a Xcel Energy’s 2024 Annual Safety, Reliability, and Service Quality Report*, Order, July 25, 2025, Docket No. E002/M-25-27, (eDockets) [20257-221406-01](#).

customer appeals, etc.),<sup>69</sup> the Department concludes that a full proposal from the Company, filed in its next SRSQ to be filed April 1, 2026, would provide stakeholders with the opportunity for robust review. The Department recommends the Commission require Xcel to develop a proposal for a hot weather rule to prevent disconnections in months with the highest cooling energy burden to be filed with Xcel's next SRSQ filed on April 1, 2026.

*G.21. Order Points 35 and 36—Equity-related requirements<sup>70</sup>*

*35. Xcel must inform affected personnel of racial disparities in electric service.*

*36. Xcel must file a compliance report with its annual safety, reliability, and service quality filing on which employees received the training and what information was provided.*

At G.21. in initial comments, the Department requested that Xcel, in reply comments, provide an update on the progress on and the timeline of its goal to develop and administer a new training that focuses on overcoming unintended bias in customer interactions during service interruptions.<sup>71</sup>

Xcel states it believes the requirements of this Order Point are connected to the requirements of Order Point 46, which requires the Company to:

*“[H]ire an independent third-party evaluator with expertise in evaluating racial disparities to conduct a one-year study that will evaluate Xcel's practices and policies related to capital investment planning, outage restoration practices, and shutoff practices to better understand the causes of these discrepancies in shutoff rates and service reliability. Xcel must engage interested stakeholders to participate and collaborate with the independent third-party evaluator.”<sup>72</sup>*

The Company states the third-party evaluator will help the Company understand the causes of the disparities and potential solutions as well as the proper content for the training and which employees should receive the training.<sup>73</sup> The Company states it will report on these efforts in its next SRSQ Annual Report filed in April 2027. The Department believes this discrepancy to be a typo, as the next SRSQ will be filed in 2026.

The Department concludes the process is ongoing and will review the Company's report in its 2026 SRSQ Report.

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<sup>69</sup> [Minn. Stat. § 216B.096](#).

<sup>70</sup> 2023 SRSQ Order, at Order Points 35 and 36.

<sup>71</sup> *Id.*, at 69.

<sup>72</sup> 2023 SRSQ Order, Order Point 46.

<sup>73</sup> Xcel Reply Comments, at 15.

*G.23. Order Points 39, 40, and 41—Interactive map additions<sup>74</sup>*

*39. Xcel must add the following data to its interactive service quality map by census block group by April 1, 2025:*

- *Municipal boundaries*
- *Premise counts by census block group*
- *Percentage of underground electric assets*
- *Percent of electric premises disconnected for 24 hours or more*
- *Average age of arrears for disconnected premises*
- *Per premises energy costs*

*40. Xcel must add to its interactive service quality map the average age of homes by Census Block Group by April 1, 2025.*

*41. Xcel must add to its interactive service quality map the average amount of arrears for disconnected premises by April 1, 2025.*

At G.23. in initial comments, the Department requested that Xcel, in reply comments, provide an update on its progress in updating the service quality map to align with the EOY 2024 vintage. Further, the Department requested that Xcel, in reply comments, provide an update on its progress to add the “average age for disconnected premises” and “average amount of arrears for disconnected premises” to its map.<sup>75</sup>

The Company states its update of all map data layers to the End of Year 2024 vintage is in progress and slated to be completed by September 2025.<sup>76</sup> The Company states that, regarding the “average amount of arrears for disconnected premises,” that the Company has now compiled the necessary data and can now calculate a CBG-level average and add the data to the map. Xcel expects this data to be added by August 15, 2025. The Company no longer believes it is feasible or useful to attempt to map the “average age of arrears for disconnected premises” because 1) debt is tracked at the account level, not the premise level, 2) the Company’s data management systems do not store data on the age of arrears at the time of disconnection back to EOY 2024, and 3) under the Company’s credit timelines, a residential customer will not face disconnections for many weeks after beginning to accrue a past-due balance, and will not receive a disconnection notice until they have arrears 60+ days old.<sup>77</sup>

The Department concludes the Company is in progress to completing its required additions to its interactive service quality map.

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<sup>74</sup> 2023 SRSQ Order, at Order Points 39, 40, and 41.

<sup>75</sup> Department Initial Comments, at 71.

<sup>76</sup> Xcel Reply Comments, at 17.

<sup>77</sup> Xcel Reply Comments, at 17-18.

*G.25. Order Points 38 and 44—targeted undergrounding and reliability programs<sup>78</sup>*

*38. Xcel must perform additional analysis as outlined in decision options below prior to developing a proposal for targeted undergrounding or enhanced vegetation management.*

*44. Xcel must develop its data collected on causes of CELI-12 outages to inform which causes predominantly affect CBGs currently showing increased CELI-12. Xcel must then analyze whether the primary causes emerging in census block groups with increased CELI-12 are caused by overhead assets.*

At G.25. in initial comments, the Department requested that Xcel, in reply comments, discuss what a sufficiently long analysis period would be (if not the three-year rolling average utilized in the TRC Companies study) including the availability of the data needed to evaluate CELI trends in the affected CBGs across the longer analysis period.<sup>79</sup> Xcel stated in its Petition:

This highlights a limitation of the three-year rolling average data used in the TRC Study. Relatively small geographic areas can be disproportionately impacted due to the distinct locations where a storm's most damaging impact occurs. It is not clear based on the current data, what the expected return period is for a storm of similar intensity to the August 14, 2020, storm. As a result, the five-year period analysis performed here may not be sufficiently long enough to support conclusions on specific CBGs.<sup>80</sup>

The Company states that a 10-year period would provide a more statistically meaningful baseline for evaluating CELI-12 trends in the affected census block groups (CBG).<sup>81</sup> The Company states:

A 10-year period will not be immune to influences from geographically concentrated impacts of extreme weather events. However, it represents a balance to also reflect the current performance of electric distribution system, which can be influenced by upgrades and configuration changes in recent history. This proposed longer timeframe allows for a more comprehensive evaluation of reliability performance by smoothing out short-term anomalies and better capturing the variability introduced by extreme weather events.<sup>82</sup>

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<sup>78</sup> 2023 SRSQ Order, at Order Points 38 and 44

<sup>79</sup> *Department Initial Comments*, at 75.

<sup>80</sup> Part 3 of 3: Order Compliance at 120.

<sup>81</sup> Xcel Reply Comments, at 19.

<sup>82</sup> *Ibid.*

To the Department's request regarding the availability of the data, the Company states it has access to the necessary reliability data covering the past decade, including detailed outage records for the affected CBGs.<sup>83</sup>

The Department turned to the Minnesota State Hazard Mitigation Plan (MN Hazard Mitigation Plan) published by the Minnesota Department of Public Safety, Division of Homeland Security and Emergency Management for guidance on Minnesota's climate change impacts including extreme weather.<sup>84</sup> The MN Hazard Mitigation Plan states:

Climate change in Minnesota has by far the strongest associations with (1) sharp declines in the frequency and severity of extreme cold outbreaks, tied to a persistent warming of winters, and (2) sharp increases in the frequency and intensity of extreme precipitation events. For instance, from 1970 through 2023, Minnesota's winters warmed at a rate of almost one degree F per decade, and approximately three-four times faster than summer. During that same period, the coldest night of the year has warmed almost twice as fast as winter as a whole—up to two degrees F per decade (or 20 degrees F per century).<sup>85</sup>

Despite the major losses of cold extremes, the MN Hazard Plan states that the warming climate and increased abundance of atmospheric moisture has led to an uptick in many heavy snowfall metrics in the state—leading to moderately high confidence that climate change is leading to increasingly heavy snowfall events in Minnesota.<sup>86</sup> Further the MN Hazard Mitigation Plan states:

Dramatic losses in extreme cold and additional increases in heavy and extreme precipitation are expected to remain the state's leading climate change symptoms. Although Minnesota has not yet observed increases in the frequency, severity, or duration of summertime high temperatures or drought (through 2023), climate model projections summarized in NCA5 [the fifth National Climate Assessment] indicate that heat waves are all but certain to increase by mid-century. A 2018 study conducted by NOAA scientists indicates that by the 2050s, heat waves in Minnesota will be more attributable to climate change than to natural variability.<sup>87</sup>

Simply stated, increases in temperatures and extreme precipitation events are already challenging aging infrastructure and are expected to continue to impair various sector's infrastructure including the electric grid.<sup>88</sup>

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<sup>83</sup> Xcel Reply Comments, at 19.

<sup>84</sup> MN Hazard Mitigation Plan.

<sup>85</sup> *Id.*, at 32.

<sup>86</sup> *Ibid.*

<sup>87</sup> *Ibid.*

<sup>88</sup> *Id.*, at 34.

The Department was initially concerned that a longer analysis period would minimize the impacts of climate change on reliable delivery of electric service in the recent past, however, the analysis provided in the MN Hazard Mitigation Plan illustrates trends in climate data that are much longer term than the 5-year analysis period utilized in the TRC study.

The Department is unopposed to Xcel initiating its own study to evaluate CELI trends utilizing a 10-year analysis period. However, while a longer analysis period may flatten variability and provide a new average for reliability performance, outlier years of particularly concerning reliability performance will still be of interest to the Department, the Commission, and assumedly other stakeholders.

Overall, The Department recommends the Commission accept Xcel's 2024 Service Quality Report.

#### **IV. DEPARTMENT RECOMMENDATIONS**

Based on analysis of the Petition, relevant Orders and Rules, and the information in the record, the Department has prepared recommendations, which are provided below. The recommendations correspond to the subheadings of Section III above.

##### *A. RESPONSE TO NOTICE TOPICS*

- A.1. The Department reserves its final recommendation on the Xcel's 2024 Service Reliability Report until IEEE has provided the information necessary to fulfill the Commission's reliability-related reporting requirements.
- A.2. The Department recommends the commission approve the Company's request for a variance from Minn. R. 7820.2500.

##### *B. ANNUAL SAFETY REPORT*

- The Department recommends the Commission accept Xcel's 2024 Safety Report.

##### *C. ANNUAL RELIABILITY REPORT—RULES BASED REPORTING REQUIREMENTS*

- The Department recommends the Commission accept this component of the Company's 2024 Service Reliability Report.

##### *E. ANNUAL SERVICE QUALITY REPORT—RULES BASED REPORTING REQUIREMENTS*

- E.3. The Department concludes Xcel complied with the reporting requirement.

##### *F. ANNUAL SERVICE QUALITY REPORT—ORDER BASED REPORTING REQUIREMENTS*

- F.5.2.7. The Department recommends the Commission accept Xcel's update on implementing texting capabilities for customer contact.
- F.5.2.8. The Department recommends the Commission require Xcel to evaluate whether it could allow a customer to complete its Medically Necessary Equipment & Emergency Certification form and indicate that Xcel may reach out to their medical provider to confirm need for medically necessary service within it next annual SRSQ report, to be filed April 1, 2026.

*G. PART 3 OF 3 OF XCEL'S PETITION—ORDER POINTS THAT REPRESENT NEW REPORTING REQUIREMENTS FROM THE 2023 SRSQ ORDER*

- G.1. The Department will provide a recommendation on the Company's 2024 Reliability Report and its 2025 reliability goals after reviewing Xcel's supplemental filing on the IEEE 2024 report on benchmarking data that the Company will file later in 2025.
- G.2. The Department will provide a recommendation on the Company's 2024 Reliability Report and its 2025 reliability goals after reviewing Xcel's supplemental filing on the IEEE 2024 report on benchmarking data that the Company will file later in 2025.
- G.6. The Department concludes the Company has complied with the reporting requirement of this order point.
- G.7. The Department concludes the Company complied with the reporting requirement of this Order Point.
- G.11. The Department concludes the Company complied with the reporting requirements of this Order Point.
- G.17. The Department will review the Company's proposed plans in its ECO Triennial Plan and its Natural Gas Innovation Plan.
- G.17. The Department recommends the Commission require Xcel to develop a proposal for a hot weather rule to prevent disconnections in months with the highest cooling energy burden to be filed with Xcel's next SRSQ filed on April 1, 2026.
- G.21. The Department concludes the process is ongoing and will review the Company's report in its 2026 SRSQ Report.
- G.23. The Department concludes the Company is in progress to completing its required additions to its interactive service quality map.
- G.25. The Department is unopposed to Xcel initiating its own study to evaluate CELI trends utilizing a 10-year analysis period.
- G.25. The Department recommends the Commission accept Xcel's 2024 Service Quality Report.

## **CERTIFICATE OF SERVICE**

I, Sharon Ferguson, hereby certify that I have this day, served copies of the following document on the attached list of persons by electronic filing, certified mail, e-mail, or by depositing a true and correct copy thereof properly enveloped with postage paid in the United States Mail at St. Paul, Minnesota.

**Minnesota Department of Commerce  
Supplemental Comments**

**Docket No. E002/M-25-27**

Dated this 6<sup>th</sup> day of **November 2025**

**/s/Sharon Ferguson**

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25	Kavita	Maini	kmainsi@wi.rr.com	KM Energy Consulting, LLC		961 N Lost Woods Rd Oconomowoc WI, 53066 United States	Electronic Service		No	Official 25-27
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