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Minnesota Attorney General Keith Ellison
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January 19, 2022

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

Re: *In the Matter of a Commission Inquiry Into Privacy Policies of Rate-Regulated Energy Utilities*
Docket No. E,G-999/CI-12-1344

In the Matter of a Petition by Citizens Utility Board of Minnesota to Adopt Open Data Access Standards
Docket No. E,G999/M-19-505

In the Matter of the Petition of Northern States Power Company and CenterPoint Energy for Approval of the Process to Release Whole Building Data to Facilitate Local Residential Rental Ordinance Compliance
Docket No. E,G002,008/M-21-761

Dear Mr. Seuffert:

The Minnesota Office of the Attorney General—Residential Utilities Division (“OAG”) files this letter to respond to arguments that the confidence interval methodology developed by the Northern States Power Company d/b/a Excel Energy (“Xcel”) and CenterPoint Energy Resources Corp. d/b/a CenterPoint Energy (“CenterPoint”) (collectively the “Utilities”) should be expanded beyond the specific circumstances articulated in the Utilities’ joint petition (“Petition”). Broadly applying the methodology in lieu of explicit customer consent is not warranted at this time for two reasons. First, it would deprive other municipal decisionmakers of the opportunity to explore whether releasing city-specific customer energy usage data (“CEUD”) is in their residents’ best interests. Second, the current record lacks sufficient evidence to demonstrate that the methodology would adequately aggregate/anonymize CEUD outside of the context of the City of Minneapolis’s Time of Rent Disclosure Ordinance. If the Minnesota Public Utilities Commission (“Commission”) approves the confidence interval methodology proposed in the Petition, it should explicitly limit its approval to the instant request and require any utility that wishes to deviate from the current CEUD requirements for other customers to seek Commission approval on a case-by-case basis.

Background

In a January 2017 order, the Commission prohibited a utility from disclosing CEUD without customer consent unless the utility could adequately anonymize the CEUD.¹ In February 2019, the City of Minneapolis passed the Time of Rent Disclosure Ordinance (“Ordinance”), which requires residential rental property owners to provide prospective renters with energy use information at the time of rental application.² In a November 2020 order, the Commission adopted Open Access Data Standards for whole building aggregated CEUD.³ However, the standards do not allow a utility to release CEUD for fewer than four customers.⁴ Because the Utilities understand the Commission’s orders to require customer consent prior to the release of CEUD that cannot be anonymized, the City of Minneapolis is not enforcing the Ordinance for rental property owners of one-to-four unit properties pending a Commission decision on the Petition.⁵

Analysis

The Petition narrowly restricts the Utilities’ use of the methodology to one-to-four unit properties for the purpose of complying with the City of Minneapolis’s Ordinance. In passing the Ordinance, the City of Minneapolis explored the privacy concerns of its residents and determined that the benefits of releasing data on average energy usage to prospective renters outweighed those concerns.⁶ The City of Minneapolis’s position is best articulated by Council Member Fletcher, who said:

I like the solution that we’ve come to: to aggregate across time if you can’t aggregate across multiple units. So property owners cannot get access to month to month data that shows minute changes that might be revealing of personal practices or habits that should be free from intrusion. I don’t want to be given the choice as a tenant to be giving all of my information or not participating in this program. I don’t think giving consent that gives the landlord access to the full data meets the needs of what we proposed, which aggregates the data in the way that inhibits a person giving too many insights while simultaneously revealing data to get to people so they think about energy efficiency.⁷

¹ *In the Matter of Commission Inquiry into Privacy Policies of Rate-Regulated Energy Utilities*, Docket No. E, G999/CI-12-1344, ORDER GOVERNING DISCLOSURE OF ENERGY USE DATA TO THIRD PARTIES, REQUIRING FILING OF PRIVACY POLICIES AND COST DATA, AND SOLICITING COMMENT, Order Point 2 (Jan. 19, 2017).

² Minneapolis, Minn., Ordinance No. 2019-007, § 1 (Feb. 15, 2019).

³ *In the Matter of a Petition by Citizens Utility Board of Minnesota to Adopt Open Access Data Standards, Compliance Filing*, Docket No. E,G999/M-19-505 and E,G999/CI-12-1344, ORDER ADOPTING OPEN DATA ACCESS STANDARDS AND ESTABLISHING FURTHER PROCEEDINGS, Order Point 1 (Nov. 20, 2020).

⁴ *Id.*

⁵ *In the Matter of the Joint Petition for Approval of the Process to Release Whole Building Data to Facilitate Local Residential Rental Ordinance Compliance*, Docket No. E,G002,008/M-21-761, Joint Petition for Approval of the Process to Release Whole Building Data to Facilitate Local Residential Rental Ordinance Compliance at 7-9 (Oct. 29, 2021).

⁶ *See generally* Docket No. E,G002,008/M-21-761, OAG Attach. A, City of Minneapolis Response to OAG IR Nos. 001-003 (Dec. 1, 2021).

⁷ *Id.* at 2.

The Commission should not substitute its CEUD judgment for that of a municipality's elected officials. The Ordinance represents a value judgment by the City of Minneapolis after balancing the city-specific benefits of CEUD access with residents' potential privacy concerns. Other municipalities should have the same opportunity to evaluate the city-specific pros and cons of CEUD access for their residents and develop the aggregation and/or anonymization methodology that best suits their particular circumstances. Put differently, the Minneapolis City Council weighed the benefits and risks of allowing the release of CEUD in these circumstances and made a decision on behalf of the residents that it represents. The Commission should not impose the Minneapolis City Council's decision on residents of other municipalities with other elected leaders.

Furthermore, the Petition as filed only applies to ratepayers in Minneapolis. Accordingly, residents of other municipalities who might have harbored privacy concerns would not have been on notice that potential approval of the Petition would have impacted them. The scope of the Petition should not be expanded so broadly during the notice and comment period. For these reasons, the Commission should not extend the use of the confidence interval methodology beyond the instant Petition at this time.

The current record also lacks sufficient evidence to demonstrate that the Utilities' confidence interval methodology would adequately aggregate/anonymize CEUD outside of the context of the Ordinance. As noted by the Utilities, the methodology was developed in response to the specific requirements of the Ordinance and through a collaborative partnership with the City of Minneapolis that dates back to 2015.⁸ The methodology was also developed using 24 months of historical electric usage data for specific Minneapolis customers.⁹ And, although confidence interval methodology may be a widely accepted statistically methodology generally, outside of its proposed use in the Petition, no party provided any empirical evidence that it has been successfully used in other contexts to aggregate/anonymize CEUD.

Assuming the methodology is approved for purposes of the Petition and proves successful, the OAG is not opposed to considering its use more broadly as part of the CEUD docket(s). However, it is simply too early to know if the methodology sufficiently aggregates/anonymizes CEUD such that it could not be used by third parties for malicious purposes.¹⁰ Like the Minnesota Department of Commerce, the OAG "does not [currently] have the expertise required to determine whether the proposed methodology would adequately prevent re-identification."¹¹ Thus, if the Commission approves the Petition's confidence interval methodology, at least for the time being, it should explicitly limit the approval to the instant request. If a utility wishes to deviate from the current CEUD requirements it may seek Commission approval on a case-by-case basis.

⁸ Docket No. E,G002,008/M-21-761, Petition at 7-8.

⁹ *Id.* at 10.

¹⁰ *See, e.g.*, Docket No. E,G002,008/M-21-761, Comments of Fresh Energy at 2 (Dec. 8, 2021) ("Nonetheless, malicious actors would have no way to determine the specific habits of the current residents, including ascertaining their daily schedule or if resident are "snowbirds" or absent for substantial portions of the year.")

¹¹ Docket No. E,G002,008/M-21-761, Comments of the Minnesota Department of Commerce at 3 (Dec. 8, 2021).

Mr. Will Seuffert
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January 19, 2022
Page 4

Conclusion

Although the confidence interval methodology proposed in the Petition is sufficient to meet the requirements of the Ordinance, broad application of the methodology in lieu of explicit customer consent is not warranted at this time because it would substitute the Commission's judgment about the release of CEUD for that of local municipalities. Moreover, the current record lacks sufficient evidence to demonstrate that the methodology would adequately aggregate/anonymize CEUD outside of the Ordinance. Until a more rigorous review of the methodology can be undertaken, the Commission should require any utility that wishes to deviate from the current CEUD requirements to seek Commission approval on a case-by-case basis.

Sincerely,

/s/ Kristin Berkland

KRISTIN BERKLAND

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December 1, 2021

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Assistant Attorney General
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RE: *In the Matter of a Commission Inquiry Into Privacy Policies of Rate-Regulated Energy Utilities*
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In the Matter of a Petition by Citizens Utility Board of Minnesota to Adopt Open Data Access Standards
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Docket No. E,G002,008/M-21-761

Dear Mr. Kieley:

Thank you for your office's November 17, 2021 *Office of the Attorney General—Residential Utilities Division's Information Request numbers 001 - 003* in the above-entitled matters. We appreciate your interest in the City's time-of-rent disclosure policy ("Ordinance") and gladly provide the following information you have requested.

"When drafting the Ordinance, did the City consider the Commission's January 19, 2017 Order regarding CEUD in Docket No. E,G999/CI-12-1344 whereby the Commission prohibited utilities from releasing CEUD to any person other than the account holder or someone authorized by the account holder to receive their CEUD, unless that CEUD can be anonymized so that the CEUD of individual customers cannot be identified? If so, please provide a narrative explanation."

Yes, the City was aware of and did consider this specific Commission Order regarding CEUD. City staff and policy makers spent time considering the Commission Order's impact on the Ordinance during the drafting and approval process. The City also did extensive engagement with many stakeholders leading up to Ordinance adoption, and the topic of CEUD came up in conversations, including with Xcel Energy and CenterPoint Energy ("the Utilities"). In particular, the City and the Utilities have discussed how the Utilities interpret and comply with the requirements of the PUC's Order, given that the Order left the utilities with some discretion in implementation.

After these conversations with the Utilities and many other stakeholders, the City felt confident to proceed with Ordinance adoption. The City felt at the time that implementation of the policy in 2021 would be successful given that the Commission's definition of CEUD was not exhaustive, that

the utilities retained latitude in creating policy (such as aggregation thresholds, at that time) to comply with the Order, and the City had created a two-year “runway” between ordinance adoption and implementation to finetune the data-specific requirements for compliance.

Is there any legislative history (committee recordings, notes, etc.) demonstrating that the City otherwise considered privacy concerns when drafting the Ordinance? If so, please provide such documents in addition to providing a narrative response.”

There is a substantial [legislative history](#) regarding the Ordinance available for public review, spanning from the Ordinance’s introduction in late 2018, to public hearings and ordinance adoption in early 2019, to a recent update regarding implementation in 2021. In particular, the most substantive, recorded conversations occurred at a February 4, 2019 meeting of the *Public Health, Environment, Civil Rights, and Engagement Committee*, which featured an Ordinance [overview presentation](#) by Sustainability Director Kim Havey, a substantial public hearing with public comments, and deliberations by the Committee members (see [meeting video](#) starting at 5:54 and ending at 1:58:25). The Ordinance was officially adopted by the full City Council at their meeting on February 15, 2019, where additional amendments were adopted and council members concluded their deliberations (see [meeting video](#) starting at 23:38 and ending at 30:40). The most recent conversation before the Council was on September 9, 2021 when an [implementation update was presented](#) by staff to the *Policy & Government Oversight Committee* (see [meeting video](#) starting at 53:10 and ending at 1:22:15).

Pertaining most directly to consideration of data privacy during the drafting and implementation of the Ordinance, Council Member Fletcher on several occasions commented regarding this subject at public Board meetings of the Minneapolis Clean Energy Partnership (CEP). The following statements were recorded in the adopted meeting minutes of two Board meetings:

2019 Q4 CEP Board Meeting (November 14, 2019)

“Council Member Fletcher stated that he is not in favor of property owners getting to the level of granularity where they could see a monthly bill for an individual renter and use that information to attempt to modify behavior. He believes monthly data usage granularity could be an intrusion in terms of data privacy and that aggregating over time is better because it would protect privacy and still provide energy data. Emma explained that CenterPoint Energy’s comments are supportive of the public interest goal for data access, but it also does not want retaliation against the customer by a landlord that has access to data. Luke added that the City has had conversations with CenterPoint Energy on this issue. The City and CenterPoint Energy feel that asking the PUC to recognize property owners as unique third parties for many different reasons could be balanced by stipulations to ensure that the information will not be used in a retaliatory manner.”
([Meeting Minutes](#) – page 7)

2021 Q1 CEP Board Meeting (February 9, 2021)

“CM Fletcher: I expressed concerns over data privacy in the past and I want to clarify what this means and doesn’t mean because I don’t like Xcel’s solution because I don’t want customers to consent to giving too much data. I like the solution that we’ve come to: to aggregate across time if you can’t aggregate across multiple units. So property owners cannot get access to month to month data that shows minute changes that might be revealing of personal practices or habits that should be free from intrusion. I don’t want to be given the choice as a tenant to be giving all of my information or not participating in this program. I don’t think giving consent that gives the landlord access to the full data meets the needs of what we proposed, which aggregates the data in the way that inhibits a person giving too many insights while simultaneously revealing data to get to people so

they think about energy efficiency. I ask Xcel Energy to reconsider this because it's so important and I think we have a solution that allows everyone to participate in a way that is not intrusive. We solved data privacy issues to my satisfaction." ([Meeting Minutes](#) – pages 4-5)

The meeting minutes from other CEP quarterly Board meetings over the last three years also document broader discussions of the City's Ordinance, the PUC ruling, and the Utilities' interpretations and implementations. Meeting minutes can be reviewed further in the [Board meeting materials](#) posted publicly at the CEP webpage.

“Reference: Petition at 8 (“According to the City of Minneapolis . . . 87% of rental properties are one-to-four unit buildings.”)

What percentage of the City's rental properties are classified as single unit rentals? How many single unit rentals are there in the City?

What percentage of the City's rental properties are classified as 2-unit rentals? How many 2-unit rentals are there in the City?

What percentage of the City's rental properties are classified as 3-unit rentals? How many 3-unit rentals are there in the City?

What percentage of the City's rental properties are classified as 4-unit rentals? How many 4-unit rentals are there in the City?”

Information from City systems regarding active rental licenses was most recently analyzed on November 29, 2021, more current than what was relayed in Utilities' joint petition. Rental license information and counts change daily as individual licenses are added to the system or expire. At this time, two categories of rental license are exempt from compliance with the policy: rental condominium units (3,055 rental licenses) and buildings with less than two years of occupancy (123 rental licenses); they are excluded from the table below.

Building Category	Number of Properties	Number of Units	Share of Total Properties	Share of Total Units
Single Unit Rental	7,367	7,768	38.2%	8.5%
2-Unit Rental	7,944	13,647	41.2%	15.0%
3-Unit Rental	583	1,700	3.0%	1.9%
4-Unit Rental	1,065	4,436	5.5%	4.9%
Apartment Building (5 or More Units and less than 50,000 square feet)	2,030	31,426	10.5%	34.5%
Apartment Building (50,000 square feet or greater)	315	31,998	1.6%	35.2%
Total	22,482	90,975	-	-

Minneapolis thanks the Office of the Attorney General for consideration of our reply, and we are available to respond to any further questions you may have.

Sincerely,

Luke Hollenkamp

Division of Sustainability

612-673-2349

Luke.Hollenkamp@minneapolismn.gov

CERTIFICATE OF SERVICE

Re: *In the Matter of a Commission Inquiry Into Privacy Policies of Rate-Regulated Energy Utilities*
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I, JUDY SIGAL, hereby certify that on the 19th day of January, 2022, I e-filed with eDockets a *Letter of the Minnesota Office of The Attorney General—Residential Utilities Division* and served a true and correct copy of the same upon all parties listed on the attached service list by e-mail, electronic submission, and/or United States Mail with postage prepaid, and deposited the same in a U.S. Post Office mail receptacle in the City of St. Paul, Minnesota.

/s/ Judy Sigal
JUDY SIGAL

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Scott	Bohler	scott.bohler@ftr.com	Frontier Communications Corporation	2378 Wilshire Blvd Mound, MN 55364-1652	Electronic Service	No	OFF_SL_19-505_Official
Jon	Braman	jbraman@brightpower.com	Bright Power, Inc.	11 Hanover Square, 21st floor New York, NY 10005	Electronic Service	No	OFF_SL_19-505_Official
Sheri	Brezinka	sbrezinka@usgbc.org	USGBC-Minnesota Chapter	701 Washington Ave. N Suite 200 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_19-505_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Annika	Brindel	abrindel@nhtinc.org	National Housing Trust	1101 30th Street NW Ste 100A Washington, DC 20007	Electronic Service	No	OFF_SL_19-505_Official
Charlie	Buck	charlie.buck@oracle.com	Oracle	760 Market St FL 4 San Francisco, CA 94102	Electronic Service	No	OFF_SL_19-505_Official
Richard	Carter	rick.carter@ihbcorp.com		2780 Shadywood Rd Excelsior, MN 55331-9599	Electronic Service	No	OFF_SL_19-505_Official
Brent	Christensen	brentc@mnta.org	Minnesota Telecom Alliance	1000 Westgate Drive, Ste 252 St. Paul, MN 55117	Electronic Service	No	OFF_SL_19-505_Official
Andrew	Clearwater	N/A	Future of Privacy Forum	1400 Eye St NW Ste 450 Washington, DC 20005-6503	Paper Service	No	OFF_SL_19-505_Official
Roger	Colton	roger@fsconline.com		34 warwick road belmont, ma 02478	Electronic Service	No	OFF_SL_19-505_Official
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_19-505_Official
Riley	Conlin	riley.conlin@stoel.com	Stoel Rives LLP	33 S. 6th Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-505_Official
Stacy	Dahl	sdahl@minnkota.com	Minnkota Power Cooperative, Inc.	5301 32nd Ave S Grand Forks, ND 58201	Electronic Service	No	OFF_SL_19-505_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Steve	Downer	sdowner@mmua.org	MMUA	3025 Harbor Ln N Ste 400 Plymouth, MN 554475142	Electronic Service	No	OFF_SL_19-505_Official
Trent	Fellers	Trent.Fellers@windstream.com	Windstream	1440 M St Lincoln, NE 68508	Electronic Service	No	OFF_SL_19-505_Official
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_19-505_Official
Jenny	Glumack	jenny@mrea.org	Minnesota Rural Electric Association	11640 73rd Ave N Maple Grove, MN 55369	Electronic Service	No	OFF_SL_19-505_Official
Bill	Gullickson	wdgyv76@yahoo.com		1819 Colfax Avenue S Minneapolis, MN 55403	Electronic Service	No	OFF_SL_19-505_Official
Adam	Heinen	aheinen@dakotaelectric.com	Dakota Electric Association	4300 220th St W Farmington, MN 55024	Electronic Service	No	OFF_SL_19-505_Official
Ryan	Hentges	ryanh@mvec.net	Minnesota Valley Electric Cooperative	125 Minnesota Valley Electric Dr Jordan, MN 55352	Electronic Service	No	OFF_SL_19-505_Official
Caroline	Horton	chorton@aeonmn.org	Aeon	901 N 3rd St Ste 150 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_19-505_Official
Craig	Johnson	cjohnson@lmc.org	League of Minnesota Cities	145 University Ave. W. Saint Paul, MN 55103-2044	Electronic Service	No	OFF_SL_19-505_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Alexandra	Klass	aklass@umn.edu		University of Minnesota Law School 229-19th Avenue South Minneapolis, MN 55105	Electronic Service	No	OFF_SL_19-505_Official
Nicolle	Kupser	nkupser@greatermngas.com	Greater Minnesota Gas, Inc. & Greater MN Transmission, LLC	1900 Cardinal Ln PO Box 798 Fairbault, MN 55021	Electronic Service	No	OFF_SL_19-505_Official
Erica	Larson	erica.larson@centerpointenergy.com	CenterPoint Energy	505 Nicollet Avenue P. O. Box 59038 Minneapolis, Minnesota 55459-0038	Electronic Service	No	OFF_SL_19-505_Official
Annie	Levenson Falk	annief@cubminnesota.org	Citizens Utility Board of Minnesota	332 Minnesota Street, Suite W1360 St. Paul, MN 55101	Electronic Service	No	OFF_SL_19-505_Official
Kevin	Lewis	kl@bomampls.org	Greater Minneapolis BOMA	Suite 610 121 South 8th Street Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-505_Official
Todd	Lijenquist	todd.lijenquist@mmha.com	Minnesota Multi-Housing Association (MHA)	1600 West 82nd Street, Suite 110 Minneapolis, MN 55431	Electronic Service	No	OFF_SL_19-505_Official
Kevin	Marquardt	Kevin.Marquardt@CenterPointEnergy.com	CenterPoint Energy	505 Nicollet Mall PO Box 59038 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-505_Official
Sarah	Marquardt	smarquardt@mcknight.org	The McKnight Foundation	710 S 2nd St Minneapolis, MN 55401	Electronic Service	No	OFF_SL_19-505_Official
J.B.	Matthews	N/A	Cushman & Wakefield/NorthMarq	3500 American Blvd W - #200 Minneapolis, MN 55431	Paper Service	No	OFF_SL_19-505_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Craig	McDonnell	Craig.McDonnell@state.mn.us	MN Pollution Control Agency	520 Lafayette Road St. Paul, MN 55101	Electronic Service	No	OFF_SL_19-505_Official
David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022093	Electronic Service	No	OFF_SL_19-505_Official
Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP	33 South Sixth St Ste 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-505_Official
Samantha	Norris	samanhanorris@alliantenergy.com	Interstate Power and Light Company	200 1st Street SE PO Box 351 Cedar Rapids, IA 524060351	Electronic Service	No	OFF_SL_19-505_Official
Greg	Palmer	gpalmer@greaternmgas.com	Greater Minnesota Gas, Inc. & Greater MN Transmission, LLC	1900 Cardinal Ln PO Box 798 Faribault, MN 55021	Electronic Service	No	OFF_SL_19-505_Official
Tammy	Pust	Tammy.Pust@state.mn.us	Office of Administrative Hearings	PO Box 64620 St. Paul, MN 55164-0620	Electronic Service	No	OFF_SL_19-505_Official
Phyllis	Reha	phyllisreha@gmail.com		3656 Woodland Trail Eagan, MN 55123	Electronic Service	No	OFF_SL_19-505_Official
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_19-505_Official
Richard	Savelkoul	rsavelkoul@martinsquires.com	Martin & Squires, P.A.	332 Minnesota Street Ste W2750 St. Paul, MN 55101	Electronic Service	No	OFF_SL_19-505_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7 h Pl E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_19-505_Official
Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates	7400 Lyndale Ave S Ste 190 Richfield, MN 55423	Electronic Service	No	OFF_SL_19-505_Official
Brendon	Slotterback	bslotterback@mcknight.org	The McKnight Foundation	710 S 2nd St Minneapolis, MN 55401	Electronic Service	No	OFF_SL_19-505_Official
Peggy	Sorum	peggy.sorum@centerpointenergy.com	CenterPoint Energy	505 Nicollet Mall Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-505_Official
Richard	Stasik	richard.stasik@weenergygroup.com	Minnesota Energy Resources Corporation (HOLDING)	231 West Michigan St - P321 Milwaukee, WI 53203	Electronic Service	No	OFF_SL_19-505_Official
Kristin	Stastny	kstastny@taftlaw.com	Taft Stettinius & Hollister LLP	2200 IDS Center 80 South 8th St Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-505_Official
Cary	Stephenson	cStephenson@otpco.com	Otter Tail Power Company	215 South Cascade Street Fergus Falls, MN 56537	Electronic Service	No	OFF_SL_19-505_Official
Lynnette	Sweet	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_19-505_Official
Jason	Topp	jason.topp@lumen.com	CenturyLink Communications, LLC	200 S 8th St Ste 2200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-505_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Jenna	Warmuth	jwarmuth@rmpower.com	Minnesota Power	30 W Superior St Duluth, MN 55802-2093	Electronic Service	No	OFF_SL_19-505_Official
Patricia	Whitney	patricia@pwhitneylaw.com	St. Paul Assn of Responsible Landlords	627 Snelling Avenue South St. Paul, MN 55116	Electronic Service	No	OFF_SL_19-505_Official
Elizabeth	Wilson	ewilson@umn.edu	University of Minnesota	301 19th Ave South Minneapolis, Minnesota 55455	Paper Service	No	OFF_SL_19-505_Official
Josh	Winters	josh@mpirg.org	Minnesota Public Interest Research Group	2722 University Ave SE Minneapolis, MN 55414	Electronic Service	No	OFF_SL_19-505_Official
Robyn	Woeste	robynwoeste@alliantenergy.com	Interstate Power and Light Company	200 First St SE Cedar Rapids, IA 52401	Electronic Service	No	OFF_SL_19-505_Official
Jeff	Zethmayr	jzethmayr@citizensutilityboard.org	Citizens Utility Board	309 W. Washington, Ste 800 Chicago, IL 60606	Electronic Service	No	OFF_SL_19-505_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Tamie A.	Aberle	tamie.aberle@mdu.com	Great Plains Natural Gas Co.	400 North Fourth Street Bismarck, ND 585014092	Electronic Service	No	OFF_SL_21-761_M-21-761
Chad	Adams	ChadA@swmhp.org	Southwest Minnesota Housing Partnership	2401 Broadway Ave Slayton, MN 56172	Electronic Service	No	OFF_SL_21-761_M-21-761
Michael	Ahern	ahem.michael@dorsey.com	Dorsey & Whitney, LLP	50 S 6th St Ste 1500 Minneapolis, MN 554021498	Electronic Service	No	OFF_SL_21-761_M-21-761
Arnie	Anderson	ArnieAnderson@MinnCAP.org	Minnesota Community Action Partnership	MCIT Building 100 Empire Drive, Suite 202 St. Paul, MN 55103	Electronic Service	No	OFF_SL_21-761_M-21-761
Kristine	Anderson	kanderson@greatermngas.com	Greater Minnesota Gas, Inc. & Greater MN Transmission, LLC	1900 Cardinal Lane PO Box 798 Faribault, MN 55021	Electronic Service	No	OFF_SL_21-761_M-21-761
Alison C	Archer	aarcher@misoenergy.org	MISO	2985 Ames Crossing Rd Eagan, MN 55121	Electronic Service	No	OFF_SL_21-761_M-21-761
Martin S.	BeVier	bev0022@umn.edu		4001 Grand Ave South # 3 Minneapolis, MN 55409	Electronic Service	No	OFF_SL_21-761_M-21-761
Nichol	Beckstrand	Nichol.beckstrand@mmha.com	Minnesota Multi Housing Association	1600 W 82nd St Ste 110 Minneapolis, MN 55431	Electronic Service	No	OFF_SL_21-761_M-21-761
James J.	Bertrand	james.bertrand@stinson.com	STINSON LLP	50 S 6th St Ste 2600 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-761_M-21-761
Brenda A.	Bjorklund	brenda.bjorklund@centerpointenergy.com	CenterPoint Energy	505 Nicollet Mall Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-761_M-21-761

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Scott	Bohler	scott.bohler@ftr.com	Frontier Communications Corporation	2378 Wilshire Blvd Mound, MN 55364-1652	Electronic Service	No	OFF_SL_21-761_M-21-761
Jon	Braman	jbraman@brightpower.com	Bright Power, Inc.	11 Hanover Square, 21st floor New York, NY 10005	Electronic Service	No	OFF_SL_21-761_M-21-761
Sheri	Brezinka	sbrezinka@usgbc.org	USGBC-Minnesota Chapter	701 Washington Ave. N Suite 200 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_21-761_M-21-761
Annika	Brindel	abrindel@nhtinc.org	National Housing Trust	1101 30th Street NW Ste 100A Washington, DC 20007	Electronic Service	No	OFF_SL_21-761_M-21-761
Charlie	Buck	charlie.buck@oracle.com	Oracle	760 Market St FL 4 San Francisco, CA 94102	Electronic Service	No	OFF_SL_21-761_M-21-761
Richard	Carter	rick.carter@hbcorp.com		2780 Shadywood Rd Excelsior, MN 55331-9599	Electronic Service	No	OFF_SL_21-761_M-21-761
Brent	Christensen	brentc@mnta.org	Minnesota Telecom Alliance	1000 Westgate Drive, Ste 252 St. Paul, MN 55117	Electronic Service	No	OFF_SL_21-761_M-21-761
Andrew	Cleanwater	N/A	Future of Privacy Forum	1400 Eye St NW Ste 450 Washington, DC 20005-6503	Paper Service	No	OFF_SL_21-761_M-21-761
John	Coffman	john@johncoffman.net	AARP	871 Tuxedo Blvd. St. Louis, MO 63119-2044	Electronic Service	No	OFF_SL_21-761_M-21-761

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Roger	Colton	roger@fsconline.com		34 warwick road belmont, ma 02478	Electronic Service	No	OFF_SL_21-761_M-21-761
Generic Notice	Commerce Attorneys	commerce.attorneys@agate.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-761_M-21-761
Riley	Conlin	riley.conlin@stoel.com	Stoel Rives LLP	33 S. 6th Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-761_M-21-761
Brooke	Cooper	bcooper@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022191	Electronic Service	No	OFF_SL_21-761_M-21-761
George	Crocker	gwilc@nawo.org	North American Water Office	PO Box 174 Lake Elmo, MN 55042	Electronic Service	No	OFF_SL_21-761_M-21-761
Stacy	Dahl	sdahl@minnkota.com	Minnkota Power Cooperative, Inc.	5301 32nd Ave S Grand Forks, ND 58201	Electronic Service	No	OFF_SL_21-761_M-21-761
Steve	Downer	sdowner@mmua.org	MMUA	3025 Harbor Ln N Ste 400 Plymouth, MN 554475142	Electronic Service	No	OFF_SL_21-761_M-21-761
John	Farrell	jfarrell@lsr.org	Institute for Local Self- Reliance	2720 E. 22nd St Institute for Local Self- Reliance Minneapolis, MN 55406	Electronic Service	No	OFF_SL_21-761_M-21-761
Trent	Fellers	Trent.Fellers@windstream. com	Windstream	1440 M St Lincoln, NE 68508	Electronic Service	No	OFF_SL_21-761_M-21-761

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 55102198	Electronic Service	No	OFF_SL_21-761_M-21-761
Edward	Garvey	edward.garvey@AESLconsulting.com	AESL Consulting	32 Lawton St Saint Paul, MN 55102-2617	Electronic Service	No	OFF_SL_21-761_M-21-761
Edward	Garvey	garveyed@aol.com	Residence	32 Lawton St Saint Paul, MN 55102	Electronic Service	No	OFF_SL_21-761_M-21-761
Jenny	Glumack	jenny@mrea.org	Minnesota Rural Electric Association	11640 73rd Ave N Maple Grove, MN 55369	Electronic Service	No	OFF_SL_21-761_M-21-761
Todd J.	Guerrero	todd.guerrero@kutakrock.com	Kutak Rock LLP	Suite 1750 220 South Sixth Street Minneapolis, MN 554021425	Electronic Service	No	OFF_SL_21-761_M-21-761
Bill	Gullickson	wdgv76@yahoo.com		1819 Colfax Avenue S Minneapolis, MN 55403	Electronic Service	No	OFF_SL_21-761_M-21-761
Shubha	Harris	Shubha.M.Harris@xcelenergy.com	Xcel Energy	414 Nicollet Mall, 401 - FL 8	Electronic Service	No	OFF_SL_21-761_M-21-761
Adam	Heinen	aheinen@dakotaelectric.com	Dakota Electric Association	4300 220th St W Farmington, MN 55024	Electronic Service	No	OFF_SL_21-761_M-21-761
Annete	Henkel	mu@mnuutilityinvestors.org	Minnesota Utility Investors	413 Wacouta Street #230 St.Paul, MN 55101	Electronic Service	No	OFF_SL_21-761_M-21-761

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Ryan	Hentges	ryanh@mvec.net	Minnesota Valley Electric Cooperative	125 Minnesota Valley Electric Dr Jordan, MN 55352	Electronic Service	No	OFF_SL_21-761_M-21-761
Michael	Hoppe	lu23@ibew23.org	Local Union 23, I.B.E.W.	445 Etna Street Ste. 61 St. Paul, MN 55106	Electronic Service	No	OFF_SL_21-761_M-21-761
Caroline	Horton	chorton@aeonmn.org	Aeon	901 N 3rd St Ste 150 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_21-761_M-21-761
Alan	Jenkins	aj@jenkinsatlaw.com	Jenkins at Law	2950 Yellowtail Ave. Marathon, FL 33050	Electronic Service	No	OFF_SL_21-761_M-21-761
Craig	Johnson	cjohnson@lmc.org	League of Minnesota Cities	145 University Ave. W. Saint Paul, MN 55103-2044	Electronic Service	No	OFF_SL_21-761_M-21-761
Richard	Johnson	Rick.Johnson@lawmoss.com	Moss & Barnett	150 S. 5th Street Suite 1200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-761_M-21-761
Sarah	Johnson Phillips	sarah.phillips@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-761_M-21-761
Alexandra	Klass	aklass@umn.edu	University of Minnesota Law School	229-19th Avenue South Minneapolis, MN 55105	Electronic Service	No	OFF_SL_21-761_M-21-761
Thomas	Koehler	TGK@IBEW160.org	Local Union #160, IBEW	2909 Anthony Ln St Anthony Village, MN 55418-3238	Electronic Service	No	OFF_SL_21-761_M-21-761

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Nicolle	Kupser	nkupser@greatermngas.com	Greater Minnesota Gas, Inc. & Greater MN Transmission, LLC	1900 Cardinal Ln PO Box 798 Fairbault, MN 55021	Electronic Service	No	OFF_SL_21-761_M-21-761
Peder	Larson	plarson@larkinhoffman.com	Larkin Hoffman Daly & Lindgren, Ltd.	8300 Norman Center Drive Suite 1000 Bloomington, MN 55437	Electronic Service	No	OFF_SL_21-761_M-21-761
Erica	Larson	erica.larson@centerpointenergy.com	CenterPoint Energy	505 Nicollet Avenue P. O. Box 59038 Minneapolis, Minnesota 55459-0038	Electronic Service	No	OFF_SL_21-761_M-21-761
Amber	Lee	Amber.Lee@centerpointenergy.com	CenterPoint Energy	505 Nicollet Mall Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-761_M-21-761
Annie	Levenson Falk	annief@cubminnesota.org	Citizens Utility Board of Minnesota	332 Minnesota Street, Suite W1360 St. Paul, MN 55101	Electronic Service	No	OFF_SL_21-761_M-21-761
Kevin	Lewis	kl@bomampls.org	Greater Minneapolis BOMA	Suite 610 121 South 8th Street Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-761_M-21-761
Todd	Liljenquist	todd.liljenquist@mmha.com	Minnesota Multi Housing Association (MHA)	1600 West 82nd Street, Suite 110 Minneapolis, MN 55431	Electronic Service	No	OFF_SL_21-761_M-21-761
Kavita	Maini	kmairi@wi.rr.com	KM Energy Consulting, LLC	961 N Lost Woods Rd Oconomowoc, WI 53066	Electronic Service	No	OFF_SL_21-761_M-21-761
Sarah	Marquardt	smarquardt@mcknight.org	The McKnight Foundation	710 S 2nd St Minneapolis, MN 55401	Electronic Service	No	OFF_SL_21-761_M-21-761

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Kevin	Marquardt	Kevin.Marquardt@CenterPointEnergy.com	CenterPoint Energy	505 Nicollet Mall PO Box 59038 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-761_M-21-761
Pam	Marshall	pam@energycents.org	Energy CENTS Coalition	823 7 h St E St. Paul, MN 55106	Electronic Service	No	OFF_SL_21-761_M-21-761
J.B.	Matthews	N/A	Cushman & Wakefield/NorthMarq	3500 American Blvd W - #200 Minneapolis, MN 55431	Paper Service	No	OFF_SL_21-761_M-21-761
Craig	McDonnell	Craig.McDonnell@state.mn.us	MN Pollution Control Agency	520 Lafayette Road St. Paul, MN 55101	Electronic Service	No	OFF_SL_21-761_M-21-761
Stacy	Miller	stacy.miller@minneapolis.mn.gov	City of Minneapolis	350 S. 5th Street Room M 301 Minneapolis, MN 55415	Electronic Service	No	OFF_SL_21-761_M-21-761
David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022093	Electronic Service	No	OFF_SL_21-761_M-21-761
Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP	33 South Sixth St Ste 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-761_M-21-761
David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency	220 South Sixth Street Suite 1300 Minneapolis, Minnesota 55402	Electronic Service	No	OFF_SL_21-761_M-21-761
Samantha	Norris	samanhanorris@alliantenergy.com	Interstate Power and Light Company	200 1st Street SE PO Box 351 Cedar Rapids, IA 524060351	Electronic Service	No	OFF_SL_21-761_M-21-761

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Carol A.	Overland	overland@legalelectric.org	Legalelectric - Overland Law Office	1110 West Avenue Red Wing, MN 55066	Electronic Service	No	OFF_SL_21-761_M-21-761
Greg	Palmer	gpalm@greatermnngas.com	Greater Minnesota Gas, Inc. & Greater MN Transmission, LLC	1900 Cardinal Ln PO Box 798 Faribault, MN 55021	Electronic Service	No	OFF_SL_21-761_M-21-761
Tammy	Pust	Tammy.Pust@state.mn.us	Office of Administrative Hearings	PO Box 64620 St. Paul, MN 55164-0620	Electronic Service	No	OFF_SL_21-761_M-21-761
Ben	Rabe	rabe@fresh-energy.org	Fresh Energy	408 St Peter St Ste 220 St. Paul, Minnesota 55102	Electronic Service	No	OFF_SL_21-761_M-21-761
Phyllis	Reha	phyllisreha@gmail.com		3656 Woodland Trail Eagan, MN 55123	Electronic Service	No	OFF_SL_21-761_M-21-761
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 55102131	Electronic Service	Yes	OFF_SL_21-761_M-21-761
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_21-761_M-21-761
Richard	Savelkoul	rsavelkoul@martinsquires.com	Martin & Squires, P.A.	332 Minnesota Street Ste W2750 St. Paul, MN 55101	Electronic Service	No	OFF_SL_21-761_M-21-761
Emma	Schoppe	emma.schoppe@centerpointenergy.com	CenterPoint Energy Minnesota Gas	505 Nicolette Mall Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-761_M-21-761
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7 h Pl E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-761_M-21-761

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates	7400 Lyndale Ave S Ste 190 Richfield, MN 55423	Electronic Service	No	OFF_SL_21-761_M-21-761
Brendon	Slotterback	bslotterback@mcknight.org	The McKnight Foundation	710 S 2nd St Minneapolis, MN 55401	Electronic Service	No	OFF_SL_21-761_M-21-761
Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.	76 W Kellogg Blvd St. Paul, MN 55102	Electronic Service	No	OFF_SL_21-761_M-21-761
Peggy	Sorum	peggy.sorum@centerpointenergy.com	CenterPoint Energy	505 Nicollet Mall Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-761_M-21-761
Byron E.	Starns	byron.starns@stinson.com	STINSON LLP	50 S 6th St Ste 2600 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-761_M-21-761
Richard	Stasik	richard.stasik@weenergygroup.com	Minnesota Energy Resources Corporation (HOLDING)	231 West Michigan St - P321 Milwaukee, WI 53203	Electronic Service	No	OFF_SL_21-761_M-21-761
Kristin	Stastny	kstastny@taftlaw.com	Taft Stettinius & Hollister LLP	2200 IDS Center 80 South 8th St Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-761_M-21-761
Cary	Stephenson	cStephenson@otpc.com	Otter Tail Power Company	215 South Cascade Street Fergus Falls, MN 56537	Electronic Service	No	OFF_SL_21-761_M-21-761
James M	Strommen	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered	150 S 5th St Ste 700 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-761_M-21-761

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Eric	Swanson	eswanson@winthrop.com	Winthrop & Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_21-761_M-21-761
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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_21-761_M-21-761
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_21-761_M-21-761
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Patricia	Whitney	patricia@pwhitneylaw.com	St. Paul Assn of Responsible Landlords	627 Snelling Avenue South St. Paul, MN 55116	Electronic Service	No	OFF_SL_21-761_M-21-761
Samantha	Williams	swilliams@nrdc.org	Natural Resources Defense Council	20 N. Wacker Drive Ste 1600 Chicago, IL 60606	Electronic Service	No	OFF_SL_21-761_M-21-761
Elizabeth	Wilson	ewilson@umn.edu	University of Minnesota	301 19th Ave South Minneapolis, Minnesota 55455	Paper Service	No	OFF_SL_21-761_M-21-761

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Josh	Winters	josh@mpirg.org	Minnesota Public Interest Research Group	2722 University Ave SE Minneapolis, MN 55414	Electronic Service	No	OFF_SL_21-761_M-21-761
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Jeff	Zethmayr	jzethmayr@citizensutilityboard.org	Citizens Utility Board	309 W. Washington, Ste 800 Chicago, IL 60606	Electronic Service	No	OFF_SL_21-761_M-21-761
Patrick	Zomer	Pat.Zomer@lawmoss.com	Moss & Barnett a Professional Association	150 S. 5th Street, #1200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-761_M-21-761