



414 Nicollet Mall  
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August 25, 2025

—Via Electronic Filing—

Mike Bull  
Acting Executive Secretary  
Minnesota Public Utilities Commission  
121 7<sup>th</sup> Place East, Suite 350  
St. Paul, MN 55101

RE: REPLY COMMENTS  
AFFILIATE INTEREST ARRANGEMENT  
DOCKET NOS. G002/M-25-259 & G002/M-23-518

Dear Mr. Bull:

Northern States Power Company, doing business as Xcel Energy, submits the enclosed Reply Comments per the Commission's July 10, 2025 Notice of Extended Comment Period.

We have electronically filed this document with the Minnesota Public Utilities Commission, and copies have been served on the parties on the attached service list. Please contact Taige Tople at 612-216-7953 or [taige.d.tople@xcelenergy.com](mailto:taige.d.tople@xcelenergy.com) or contact me at [Holly.R.Hinman@Xcelenergy.com](mailto:Holly.R.Hinman@Xcelenergy.com) if you have any questions regarding this filing.

Sincerely,

/s/

HOLLY HINMAN  
DIRECTOR, REGULATORY AND STRATEGIC ANALYSIS

Enclosure  
cc: Service Lists

STATE OF MINNESOTA  
BEFORE THE  
MINNESOTA PUBLIC UTILITIES COMMISSION

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

IN THE MATTER OF XCEL ENERGY'S  
PETITION REQUESTING REAFFIRMATION  
OF AFFILIATE INTEREST ARRANGEMENT  
ACCOUNTING TREATMENT

DOCKET NOS. G002/M-25-259 &  
G002/M-23-518

**REPLY COMMENTS**

**INTRODUCTION**

Northern States Power Company, doing business as Xcel Energy (Company), submits the enclosed Reply Comments per the Commission's July 10, 2025 Notice of Extended Comment Period.

The Company thanks the Commission for the opportunity to respond to the filing made by the Office of the Attorney General (OAG), which combines its objection to the Company's June 16, 2025 compliance filing in response to Order Point 6 of the Commission's May 16, 2025 Order in the Company's Natural Gas Innovation Act (NGIA) docket<sup>1</sup> with its initial comments in this docket.

The objections made by the OAG to the affiliate interest arrangement center primarily on the OAG's assertion that the Sherco hydrogen pilot provides a benefit to the affiliate interest. The pilot does not, however, benefit the affiliate interest. Moreover, the Commission has already rejected this same argument made by the OAG with regard to an alleged benefit to the customer and determined that the costs, benefits, and risks of the existing affiliate arrangement cannot be attributed to the pilot.

The Company has provided robust mitigation strategies to address the risk of stranded assets from this pilot. Besides the option of serving the existing customer, the electrolyzer can be used to heat the facility buildings for operations at the Company's Sherburne County Generating Plant (Sherco), the economic plan for developing the land surrounding Sherco has extensive opportunities for future

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<sup>1</sup> Docket No. G002/M-23-518.

industrial partnerships. Finally, the electrolyzer could be used at other Company facilities. Accordingly, the Company believes that the risk of stranded assets is low.

The Company is excited about the Sherco hydrogen pilot which it believes will provide important learnings in furtherance of NGIA goals. The Company respectfully requests reaffirmation of the affiliate interest accounting treatment, as the pilot does not provide a benefit to the affiliate, and there is a low risk of a stranded asset.

## **COMMENTS**

### **I. BACKGROUND**

#### **A. Sherco Hydrogen Pilot**

As part of its NGIA Plan submitted in December, 2023,<sup>2</sup> the Company proposed a hydrogen pilot at Sherco. In this pilot, the Company plans to produce green hydrogen using an electrolyzer powered by renewable energy. The hydrogen will be blended with natural gas to provide fuel to an existing onsite auxiliary steam boiler system, which is currently used to supply steam for start-up of the coal units, heating for the Sherco building, and secondarily to provide steam for an existing industrial customer.

As the Company's first green hydrogen pilot, we hope to learn how to optimize electrolyzer operations to produce hydrogen solely using clean energy. The Company will gain knowledge about how to minimize storage requirements and control production to match usage needs. In future feasibility and engineering studies, the Company plans to determine the blend percentage and electrolyzer run times required to produce the necessary amount of hydrogen to create the blended fuel (with a goal of achieving up to a ten percent blend by volume of hydrogen into the auxiliary boiler system).

The Company is excited about the potential of its Sherco Hydrogen pilot to further the goals of the NGIA. It will allow the Company a unique and valuable opportunity to learn about hydrogen production, storage, safety and offtake, and to share the learnings of the pilot publicly. Additionally, it will provide a zero-carbon fuel option to displace some natural gas usage and reduce greenhouse gas emissions.

#### **B. Affiliate Interest Arrangement**

The Company has provided steam for the industrial customer, Liberty Paper, Inc.

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<sup>2</sup> In Docket Nos. G002/M-23-518 & G999/CI-21-566.

(LPI), for over 30 years. In setting up this service, the Company requested and received approval from the Commission<sup>3</sup> to provide steam to the industrial customer as a nonregulated venture (also referred to as the “affiliate interest”). As approved by the Commission in both 1995 and 2020, the current accounting and rate treatment for this venture requires that Company shareholders make the necessary investment and assume all business risks associated with the operations. Ratepayers are not responsible for any risks associated with supplying steam to LPI and do not incur any increased costs. Costs associated with constructing and maintaining the Steam Supply System are segregated from the utility rate base for ratemaking purposes. All operating and maintenance expenses and revenue are recorded in nonutility operating accounts.

There is regular oversight of the current accounting and rate treatment. Per the Commission’s 2020 order,<sup>4</sup> the Company has provided testimony in its rate filings outlining the services provided to LPI and demonstrating the reasonableness of the Company’s proposed cost allocations to the LPI steam sales, and also reported annually all the services, associated costs, and cost assignments between the utility and the affiliate interest which is providing steam services to LPI in its filings under Minnesota Rule 7825.2200.

### **C. Procedural Background**

In the Order approving the Company’s NGIA Plan<sup>5</sup> (NGIA Order), the Commission required the Company to (1) submit a compliance filing that describes measures taken and will take to mitigate the risk of a stranded asset for this pilot, and how it would propose to manage cost recovery for this asset if the industrial customer were to withdraw before the Company had fully recovered the asset’s costs,<sup>6</sup> and (2) file an affiliate interest arrangement in a new docket.<sup>7</sup> The Company complied with both of these requirements with filings submitted on June 16, 2025.

On August 15, 2025, the OAG filed a combined response to these filings, both objecting to the negative check-off period for the Company’s stranded asset mitigation compliance filing in the Company’s NGIA docket and providing comments regarding the affiliate interest arrangement in this docket.

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<sup>3</sup> February 14, 1995 ORDER APPROVING ACCOUNTING PROCEDURES in Docket No. E002/M-93-1253 (1995 Order); February 21, 2020 ORDER in Docket No. E002/M-19-663 (2020 Order).

<sup>4</sup> 2020 Order at 1.

<sup>5</sup> Order of May 16, 2025 in G002/M-23-518.

<sup>6</sup> Order Point 6, NGIA Order.

<sup>7</sup> Order Point 8.A, NGIA Order.

## **II. THE OAG INCORRECTLY ASSERTS THAT THE PILOT BENEFITS THE NONREGULATED ENTITY, DESPITE THE COMMISSION'S DETERMINATION TO THE CONTRARY**

During proceedings in the Company's NGIA docket,<sup>8</sup> the OAG argued that the customer should bear the risks and costs of the pilot because allegedly the customer was benefitting from the Sherco Hydrogen pilot.<sup>9</sup> In the NGIA Order, however, the Commission considered and rejected that argument, stating: "The relationships between Xcel's regulated operations and its affiliate operations, and between the affiliate and the industrial customer, predate the emergence of the proposed electrolyzer pilot, so the costs, benefits, and risks of those existing arrangements cannot be attributed to the pilot. Accordingly, the Commission will decline to alter the allocation of the revenues paid by the industrial customer."<sup>10</sup>

The OAG essentially reasserts that same argument in these proceedings, claiming that the affiliate entity benefits from the pilot and therefore it should bear the pilot's risks and costs.<sup>11</sup> The Commission, however, specifically included "the affiliate" in its determination that "the costs and benefits and risks of those existing arrangements cannot be attributed the pilot."<sup>12</sup> Accordingly, the OAG's assertion of benefit to the affiliate from the pilot has already been considered and rejected by the Commission. The OAG has not sought reconsideration on this issue, and it should be considered resolved.

### **A. The Pilot does not Benefit the Affiliate Entity**

The Commission's determination correctly resolved the OAG's argument because the

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<sup>8</sup> Docket No. G002/M-23-518.

<sup>9</sup> *See, e.g.*, OAG supplemental comments filed in Docket No. G002/M-23-518 on October 28, 2024 at 14 ("Xcel proposes to price the hydrogen produced from this pilot at the cost of conventional natural gas as set in [the] monthly purchase gas adjustment [(PGA)] filings. The costs of conventional natural gas generally range between \$2.50 to \$9/Dth. Xcel estimates that the "cost" of its hydrogen from this project is over \$49/Dth. Xcel's proposed arrangement is not fair to its regulated operations and ratepayers.") (internal quotation and footnotes omitted, alterations in original); *id.* ("Xcel's natural gas customers will be paying \$26 million to provide hydrogen to Xcel's auxiliary boiler, the sole purpose of which will be to provide steam to an unregulated customer").

<sup>10</sup> NGIA Order at 9.

<sup>11</sup> *See* OAG comments at 5 ("Because the pilot would benefit Xcel's shareholders through its unregulated operations, Xcel's shareholders must absorb the risks of not only a potential stranded asset, but also any potential additional costs needed to avoid a stranded asset."); *id.* at 7-8 ("The Sherco 5MW pilot is designed to benefit Xcel unregulated operations . . . [so] the Commission should modify the arrangement to make it clear that Xcel's shareholders must bear *all* risks of its unregulated venture's use of the electrolyzer . . .") (emphasis in original); *id.* at 8 ("Xcel's unregulated affiliate is benefitting from the construction and use of the electrolyzer and it should bear the risks.").

<sup>12</sup> NGIA Order at 9.

affiliate entity, simply put, does not receive a benefit from the hydrogen pilot.

As we explained at length in our Petition, the hydrogen pilot will blend a small amount of hydrogen<sup>13</sup> with natural gas to provide fuel to the auxiliary steam boiler, upstream of the nonregulated entity.

The steam quality and quantity produced for the nonregulated entity and the customer will remain the same as without the pilot. The only difference is that a small amount of an upstream fuel source will be displaced by the addition of hydrogen. This addition will be accounted for and so it cannot be considered a benefit. As stated in our Petition, the hydrogen will be priced at the cost equivalent to natural gas as compensation to the regulated natural gas utility for any hydrogen fuel used to support the Steam Supply System that connects the Company's Sherco facility to LPI's facility. All costs and revenues directly associated with the auxiliary boiler's support of the Steam Supply System are already tracked and reported via the Company's annual affiliate compliance filing. For additional transparency regarding the hydrogen costs, the Company has offered to include all fuel related cost information by fuel source as separate line items, as stated in our Petition.

The true benefit of the hydrogen pilot lies not in some unsubstantiated assertion of a benefit to the affiliate or customer, but in the learnings the Company seeks to gain, such as how to optimize electrolyzer operations to produce hydrogen solely using clean energy, consistent with the goals of the NGIA.

## **B. No Basis to Prohibit Cost Recovery**

The OAG argues that that the Company's shareholders "must absorb the risks of not only a potential stranded asset, but also any potential additional costs needed to avoid a stranded asset", based on the OAG's claim that "the pilot would benefit Xcel's shareholders through its unregulated operations".<sup>14</sup> As discussed above, however, the Sherco pilot does not provide a benefit to the affiliate, so the OAG's recommendation that the Commission require the Company to bear certain costs of the pilot (e.g., costs necessary to provide hydrogen to locations other than the steam boiler<sup>15</sup>), should therefore be rejected.

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<sup>13</sup> Up to ten percent.

<sup>14</sup> OAG comments at 5.

<sup>15</sup> See OAG comments at 8.

### **III. THE COMPANY IS REQUIRED TO MITIGATE THE RISKS OF THE HYDROGEN PILOT, NOT ELIMINATE THEM**

The OAG argues that “the Commission should modify the arrangement to make it clear that Xcel’s shareholders must bear *all* risks of its unregulated venture’s use of the electrolyzer”<sup>16</sup> and that “should LPI stop taking steam service from Xcel’s unregulated affiliate and no alternative use is found for the electrolyzer, Xcel should not be permitted to recover any undepreciated capital costs or return for the electrolyzer.”<sup>17</sup>

The Company disagrees. The OAG’s arguments are again based on its claim that “Xcel’s unregulated affiliate is benefiting from the construction and use of the electrolyzer, and it should bear the risks.”<sup>18</sup> As discussed previously, the pilot does not provide a benefit to the affiliate and the Commission has already determined that “costs, benefits, and risks of those existing arrangements cannot be attributed to the pilot.”<sup>19</sup> Moreover, as discussed further below, the Company was ordered to provide strategies to mitigate, not eliminate, the risk of a stranded asset.

#### **A. Order Point 6 of the NGIA Order does not Require the Company to Absorb all Risk**

Order Point 6 of the NGIA Order states:

*Within 30 days, Xcel must file an explanation detailing the steps it has taken and will take to mitigate the risk of a stranded asset for its Sherco 5MW pilot, and how it would propose to manage cost recovery for this asset if the industrial customer were to withdraw before Xcel had fully recovered the asset’s costs.*

While Order Point 6 requires that the Company provide strategies to mitigate the risk of a stranded asset with the Sherco pilot, it does not require that the Company to absorb all risk. Nor would such a requirement be reasonable. Pilots in general contain inherent risk, and NGIA pilots, which involve unfamiliar technology for the Company, are no exception. While the Company has not and cannot guarantee elimination of all risk from undertaking this pilot, the Company believes it has provided strong mitigation strategies to minimize the stranded asset risk, as discussed further below.

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<sup>16</sup> OAG comments at 7-8 (emphasis in original).

<sup>17</sup> OAG comments at 8.

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

<sup>19</sup> NGIA Order at 9.

## **B. The Company Provided Robust Mitigation Measures, Making the Risk of Stranded Assets Low**

The Company's compliance with Order Point 6 described several robust mitigation strategies for the potential risk of the electrolyzer becoming a stranded asset.<sup>20</sup> Those strategies are: (1) providing fuel to the auxiliary boiler for steam for the existing industrial client whose current contract is set to expire in 2035;<sup>21</sup> (2) providing fuel to the auxiliary boiler to heat the Sherco buildings as needed for facility operations; (3) opportunities for future industrial partnerships near Sherco through economic development planned by the Sherburne County Power Plant Development Master Plan; and (4) the potential for electrolyzer use at other Company locations. Accordingly, the Company believes the stranded asset risk to be low.

The OAG questioned the viability of mitigation strategy (2) by asking whether the Sherco operational buildings will be needed after coal retirement.<sup>22</sup> The Company anticipates continued use of these facilities to operate the synchronous condensers, a grid stability tool needed to regulate power from wind and solar. The synchronous condensers require building heat because of the sensitivity of that equipment to freezing. The OAG also observed "these buildings can be currently heated by the aux boiler, so electrolyzer use is not needed." This is true, but this has always been true ever since this pilot was conceived and proposed. The goal of the pilot is to gain knowledge about how to manage and maximize efficiency of green hydrogen. Even though the auxiliary boiler can provide heat and steam without the addition of the pilot's hydrogen, the Company would run the pilot to obtain these skills and learnings.

The OAG also complained that mitigation strategy (3) relies on a master plan for economic development instead of identifying specific alternative potential customers.<sup>23</sup> As noted in the Company's compliance filing for Order Point 6, the Sherburne County Power Plant Development Master Plan addresses development of approximately 1,800 acres of the adjacent parcels to Sherco. Over half of the developable land was determined to be optimal for large, single-user industrial sites, and the remaining 900 acres were deemed available for smaller-scale industrial uses such as manufacturing and warehouses. This provides significant opportunity to seek additional hydrogen offtake partners, should the need arise. The Company believes that it is unrealistic to expect a specific list of alternative industrial customers while the master plan that would provide those customers is still being developed and before

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<sup>20</sup> See Compliance filing for Order Point 6, filed June 16, 2025 in Docket No. G002/M-23-518.

<sup>21</sup> The customer has been with the Company for over 30 years and could chose to renew the contract. It could also terminate the contract by providing 12 months' notice.

<sup>22</sup> OAG comments at 4.

<sup>23</sup> OAG comments at 5.



there is a need.

#### **IV. OTHER ISSUES**

##### **A. The Company's Filings have been Appropriately Responsive**

The OAG complained that Company did not “address[] the extensive concerns in the NGIA docket . . . .”<sup>24</sup> The Company, however, had no obligation to address concerns broadly raised in the NGIA docket and already resolved by the Commission’s NGIA Order. Instead, the Company appropriately responded to the requirements and determinations of the Commission’s NGIA Order in its compliance filings.

##### **B. Seeking Cost Recovery from Large Commercial Customers**

The OAG recommended that the Commission should order Xcel not to pursue cost recovery from residential or small commercial customers should the need to recover stranded asset costs occur, in line with the required cost allocation for the general Sherco 5MW pilot costs.<sup>25</sup> The Company does not object to this recommendation in principle, as long as the electrolyzer is not deployed for residential or small business uses. However, we are at the very beginning stages of this pilot, and the Company believes it would be premature to make that determination now without the knowledge of the full scope of uses the asset might have over its 20-year life. Instead, the Company recommends that the Commission not impose such a limitation at this time which might be at odds with how the asset is used over its lifespan. The OAG would, of course, be free to raise this issue during a proceeding for cost recovery, should that come to pass.

##### **C. Fuel Related Cost Information in Annual Reports**

As noted above, the Company has offered to include all fuel-related cost information by fuel source as separate line items, in its annual affiliate compliance filing to provide additional transparency into hydrogen costs.<sup>26</sup> The OAG recommends that the Commission order the Company to do so.<sup>27</sup> The Company does not object to this recommendation.

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<sup>24</sup> OAG comments at 7.

<sup>25</sup> OAG comments at 2.

<sup>26</sup> Petition filed in this docket at 6.

<sup>27</sup> OAG comments at 11.

## **D. Facility Construction Start**

In its comments, the OAG urged the Commission to “not allow Xcel to begin construction on the facility”<sup>28</sup> until the affiliated interest arrangement issues raised in this docket have been resolved.<sup>29</sup>

On August 21, 2025, the Commission issued a Notice of Reply Comment in Docket No. G002/M-23-518, in response to the OAG’s objection to the negative checkoff period for the Company’s compliance filing required by Order Point 6 of the NGIA Order. One of the topics open for comment is:

- Should the Commission allow Xcel to proceed with its Sherco 5MW hydrogen pilot ahead of its final decision in Docket No. G-002/M-25-259?

Accordingly, the Company will respond in Docket No. G002/M-23-518 to the OAG’s recommendation on the timeline provided in the Commission’s August 21, 2025 Notice.

## **CONCLUSION**

The Company thanks the Commission for this opportunity to respond the OAG’s comments. The Company respectfully requests reaffirmation of the accounting treatment of the non-regulated venture providing steam service to LPI, as the pilot does not provide a benefit to the non-regulated venture, and the risks of a stranded asset are low.

Dated: August 25, 2025

Northern States Power Company

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<sup>28</sup> OAG comments at 11.

<sup>29</sup> The OAG’s full statement on this point is: “The Commission should not allow Xcel to begin construction on the facility until the Commission orders a modified affiliated interest arrangement in Docket No. G-002/M-25-259 in line with the recommendations above.” *Id.* The Company disagrees with the outcome the OAG specifies (ordering modifications to the affiliated interest agreement) for the reasons discussed through our Reply Comments, but addresses the larger point of the need for a final order in this docket before construction on the pilot begins.

## CERTIFICATE OF SERVICE

I, Joshua DePauw, hereby certify that I have this day served copies of the foregoing document on the attached list of persons.

xx by depositing a true and correct copy thereof, properly enveloped with postage paid in the United States mail at Minneapolis, Minnesota

xx electronic filing

**DOCKET NOS.      E002/M-25-259**  
**E002/M-23-518**

Dated this 25<sup>th</sup> day of August 2025

/s/

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Joshua DePauw  
Regulatory Administrator



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62	Sarah	Johnson Phillips	sjphillips@stoel.com	Stoel Rives LLP		33 South Sixth Street Suite 4200 Minneapolis MN, 55402 United States	Electronic Service		No	AI-25-259
63	Brendan	Jordan	bjordan@gpisd.net	Great Plains Institute & Bioeconomy Coalition of MN		2801 21st Ave S Ste 220 Minneapolis MN, 55407 United States	Electronic Service		No	AI-25-259
64	Cliff	Kaehler	cliff.kaehler@novelenergy.biz	Novel Energy Solutions LLC		4710 Blaylock Way Inver Grove Heights MN, 55076 United States	Electronic Service		No	AI-25-259
65	David	Kailbourne	edk@revlng.com	REV LNG, LLC		1002 Empson Rd Ulysses PA, 16948 United States	Electronic Service		No	AI-25-259
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67	Michael	Kaphing	michael.w.kaphing@xcelenergy.com	Xcel Energy		414 Nicollet Mall (401-8th Floor) Minneapolis MN, 55401 United States	Electronic Service		No	AI-25-259
68	William	Kenworthy	will@votesolar.org			1 South Dearborn St Ste 2000 Chicago IL, 60603 United States	Electronic Service		No	AI-25-259
69	Samuel B.	Ketchum	sketchum@kennedy-graven.com	Kennedy & Graven, Chartered		150 S 5th St Ste 700 Minneapolis MN, 55402 United States	Electronic Service		No	AI-25-259
70	Hudson	Kingston	hudson@curemn.org			PO Box 712 Ely MN, 55731 United States	Electronic Service		No	AI-25-259
71	Frank	Kohlasch	frank.kohlasch@state.mn.us		Minnesota Pollution Control Agency	520 Lafayette Rd N. St. Paul MN, 55155 United States	Electronic Service		No	AI-25-259
72	Nicolle	Kupser	nkupser@greatermngas.com	Greater Minnesota Gas, Inc.		1900 Cardinal Ln PO Box 798 Faribault MN, 55021 United States	Electronic Service		No	AI-25-259
73	Brenda	Kyle	bkyle@stpaulchamber.com	St. Paul Area Chamber of Commerce		401 N Robert Street Suite 150 St Paul MN,	Electronic Service		No	AI-25-259



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76	Samuel	Lehr	sam.lehr@rngcoalition.com	Coalition for Renewable Natural Gas		1017 L St #513 Sacramento CA, 95814 United States	Electronic Service		No	AI-25-259
77	Robert	Lems	administration@dmr-cgs.com	DMT Clear Gas Solutions		19125 SW 125th Ct Tualatin OR, 97062 United States	Electronic Service		No	AI-25-259
78	Rachel	Leonard	rachel.leonard@ci.monticello.mn.us	City of Monticello		505 Walnut St Ste 1 Monticello MN, 55362 United States	Electronic Service		No	AI-25-259
79	Annie	Levenson Falk	annielf@cubminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota Street, Suite W1360 St. Paul MN, 55101 United States	Electronic Service		No	AI-25-259
80	Amy	Liberkowsky	amy.a.liberkowsky@xcelenergy.com	Xcel Energy		414 Nicollet Mall 7th Floor Minneapolis MN, 55401-1993 United States	Electronic Service		No	AI-25-259
81	Eric	Lipman	eric.lipman@state.mn.us		Office of Administrative Hearings	PO Box 64620 St. Paul MN, 55164-0620 United States	Electronic Service		No	AI-25-259
82	Jason	Loos	jason.loos@centerpointenergy.com	CenterPoint Energy Resources Corp.		505 Nicollet Mall 3rd Floor Minneapolis MN, 55402 United States	Electronic Service		No	AI-25-259
83	Kavita	Maini	kmairi@wi.rr.com	KM Energy Consulting, LLC		961 N Lost Woods Rd Oconomowoc WI, 53066 United States	Electronic Service		No	AI-25-259
84	Emily	Marshall	emarshall@lourismarshall.com	Miller O'Brien Jensen, PA		120 S. 6th Street Suite 2400 Minneapolis MN, 55402 United States	Electronic Service		No	AI-25-259
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91	Matthew	Melewski	matthew@theboutiquefirm.com	Nokomis Energy LLC & Ole Solar LLC		2639 Nicollet Ave Ste 200 Minneapolis MN, 55408 United States	Electronic Service		No	AI-25-259
92	Joseph	Meyer	joseph.meyer@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	Bremer Tower, Suite 1400 445 Minnesota Street St Paul MN, 55101-2131 United States	Electronic Service		No	AI-25-259
93	Ana Sophia	Mifsud	amifsud@rmi.org	Rocky Mountain Institute (RMI)		null null, null United States	Electronic Service		No	AI-25-259
94	Stacy	Miller	stacy.miller@minneapolismn.gov	City of Minneapolis		350 S. 5th Street Room M 301 Minneapolis MN, 55415 United States	Electronic Service		No	AI-25-259
95	David	Moeller	dmoeller@allete.com	Minnesota Power			Electronic Service		No	AI-25-259
96	Tena	Monson	tmonson@cityofardenhills.org	City of Arden Hills		1245 West Highway 96 Arden Hills MN, 55112 United States	Electronic Service		No	AI-25-259
97	Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP		33 South Sixth St Ste 4200 Minneapolis MN, 55402 United States	Electronic Service		No	AI-25-259
98	Evan	Mulholland	emulholland@mncenter.org	Minnesota Center for Environmental Advocacy		1919 University Ave W Ste 515 Saint Paul MN, 55101 United States	Electronic Service		No	AI-25-259
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100	Carl	Nelson	cnelson@mncee.org	Center for Energy and Environment		212 3rd Ave N Ste 560 Minneapolis MN, 55401 United States	Electronic Service		No	AI-25-259
101	David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency		220 South Sixth Street Suite 1300 Minneapolis MN, 55402 United States	Electronic Service		No	AI-25-259
102	Samantha	Norris	samanthanorris@alliantenergy.com	Interstate Power and Light Company		200 1st Street SE PO Box 351 Cedar Rapids IA, 52406-0351 United States	Electronic Service		No	AI-25-259

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106	Carol A.	Overland	overland@legalelectric.org	Legalelectric - Overland Law Office		1110 West Avenue Red Wing MN, 55066 United States	Electronic Service		No	AI-25-259
107	Greg	Palmer	gpalmer@greatermngas.com	Greater Minnesota Gas, Inc.		1900 Cardinal Ln PO Box 798 Faribault MN, 55021 United States	Electronic Service		No	AI-25-259
108	Jessica	Palmer Denig	jessica.palmer-denig@state.mn.us		Office of Administrative Hearings	600 Robert St N PO Box 64620 St. Paul MN, 55164 United States	Electronic Service		No	AI-25-259
109	Antonio	Parisi	aparisi@sacyr.com	Sacyr Environment USA LLC		3330 Washington Blvd Ste 400 Arlington VA, 22201 United States	Electronic Service		No	AI-25-259
110	Dean	Pawlowski	dpawlowski@otpc.com	Otter Tail Power Company		PO Box 496 215 S. Cascade St. Fergus Falls MN, 56537-0496 United States	Electronic Service		No	AI-25-259
111	Catherine	Phillips	catherine.phillips@wecenergygroup.com	Minnesota Energy Resources		231 West Michigan St Milwaukee WI, 53203 United States	Electronic Service		No	AI-25-259
112	J.	Porter	greg.porter@nngco.com	Northern Natural Gas Company		1111 South 103rd St Omaha NE, 68124 United States	Electronic Service		No	AI-25-259
113	Kevin	Pranis	kpranis@liunagroc.com	Laborers' District Council of MN and ND		81 E Little Canada Road St. Paul MN, 55117 United States	Electronic Service		No	AI-25-259
114	Victoria	Reinhardt	victoria.reinhardt@co.ramsey.mn.us	Partnership on Waste and Energy		Ramsey County Board Office 15 W. Kellogg Blvd., Ste. 220 St. Paul MN, 55102 United States	Electronic Service		No	AI-25-259
115	Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	1400 BRM Tower 445 Minnesota St St. Paul MN, 55101-2131 United States	Electronic Service		Yes	AI-25-259
116	Kevin	Reuther	kreuther@mncenter.org	MN Center for Environmental		26 E Exchange St,	Electronic Service		No	AI-25-259

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119	Kevin	Saville	kevin.saville@ftr.com	Citizens/Frontier Communications		2378 Wilshire Blvd. Mound MN, 55364 United States	Electronic Service		No	AI-25-259
120	Elizabeth	Schmiesing	eschmiesing@winthrop.com	Winthrop & Weinstine, P.A.		225 South Sixth Street Suite 3500 Minneapolis MN, 55402 United States	Electronic Service		No	AI-25-259
121	Christine	Schwartz	regulatory.records@xcelenergy.com	Xcel Energy		414 Nicollet Mall, MN1180-07-MCA Minneapolis MN, 55401-1993 United States	Electronic Service		No	AI-25-259
122	Douglas	Seaton	doug.seaton@umwlc.org	Upper Midwest Law Center		8421 Wayzata Blvd Ste 300 Golden Valley MN, 55426 United States	Electronic Service		No	AI-25-259
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128	Beth	Smith	bsmith@greatermankato.com	Greater Mankato Growth		1961 Premier Dr Ste 100 Mankato MN, 56001 United States	Electronic Service		No	AI-25-259
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134	Mark	Spurr	mspurr@fvbenergy.com	International District Energy Association		222 South Ninth St., Suite 825 Minneapolis MN, 55402 United States	Electronic Service		No	AI-25-259
135	Byron E.	Starns	byron.starns@stinson.com	STINSON LLP		50 S 6th St Ste 2600 Minneapolis MN, 55402 United States	Electronic Service		No	AI-25-259
136	Richard	Stasik	richard.stasik@wecenergygroup.com	Minnesota Energy Resources Corporation (HOLDING)		231 West Michigan St - P321 Milwaukee WI, 53203 United States	Electronic Service		No	AI-25-259
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150	Kurt	Zimmerman	kwz@ibew160.org	Local Union #160, IBEW		2909 Anthony Ln St Anthony Village MN, 55418-3238 United States	Electronic Service		No	AI-25-259
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24	Thomas	Carlson	thomas.carlson@edf-re.com	EDF Renewable Energy		10 2nd St NE Ste. 400 Minneapolis MN, 55413 United States	Electronic Service		No	23-518Official
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57	Michael	Hoppe	lu23@ibew23.org	Local Union 23, I.B.E.W.		445 Etna Street Ste. 61 St. Paul MN, 55106 United States	Electronic Service		No	23-518Official
58	Travis	Jacobson	travis.jacobson@mdu.com	Great Plains Natural Gas Company		400 N 4th St Bismarck ND, 58501 United States	Electronic Service		No	23-518Official
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62	Sarah	Johnson Phillips	sjphillips@stoel.com	Stoel Rives LLP		33 South Sixth Street Suite 4200 Minneapolis MN, 55402 United States	Electronic Service		No	23-518Official
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72	Nicolle	Kupser	nkupser@greatermngas.com	Greater Minnesota Gas, Inc.		1900 Cardinal Ln PO Box 798 Faribault MN, 55021 United States	Electronic Service		No	23-518Official
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101	David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency		220 South Sixth Street Suite 1300 Minneapolis MN, 55402 United States	Electronic Service		No	23-518Official
102	Samantha	Norris	samanthanorris@alliantenergy.com	Interstate Power and Light Company		200 1st Street SE PO Box 351 Cedar Rapids IA, 52406-0351 United States	Electronic Service		No	23-518Official
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105	Logan	O'Grady	logrady@mnseia.org	Minnesota Solar Energy Industries Association		2288 University Ave W St. Paul MN, 55114 United States	Electronic Service		No	23-518Official
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107	Greg	Palmer	gpalmer@greatermngas.com	Greater Minnesota Gas, Inc.		1900 Cardinal Ln PO Box 798 Faribault MN, 55021 United States	Electronic Service		No	23-518Official
108	Jessica	Palmer Denig	jessica.palmer-denig@state.mn.us		Office of Administrative Hearings	600 Robert St N PO Box 64620 St. Paul MN, 55164 United States	Electronic Service		No	23-518Official
109	Antonio	Parisi	aparisi@sacyr.com	Sacyr Environment USA LLC		3330 Washington Blvd Ste 400 Arlington VA, 22201 United States	Electronic Service		No	23-518Official
110	Dean	Pawlowski	dpawlowski@otpc.com	Otter Tail Power Company		PO Box 496 215 S. Cascade St. Fergus Falls MN, 56537-0496 United States	Electronic Service		No	23-518Official
111	Catherine	Phillips	catherine.phillips@wecenergygroup.com	Minnesota Energy Resources		231 West Michigan St Milwaukee WI, 53203 United States	Electronic Service		No	23-518Official
112	J.	Porter	greg.porter@nngco.com	Northern Natural Gas Company		1111 South 103rd St Omaha NE, 68124 United States	Electronic Service		No	23-518Official
113	Kevin	Pranis	kpranis@liunagroc.com	Laborers' District Council of MN and ND		81 E Little Canada Road St. Paul MN, 55117 United States	Electronic Service		No	23-518Official
114	Victoria	Reinhardt	victoria.reinhardt@co.ramsey.mn.us	Partnership on Waste and Energy		Ramsey County Board Office 15 W. Kellogg Blvd., Ste. 220 St. Paul MN, 55102 United States	Electronic Service		No	23-518Official
115	Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	1400 BRM Tower 445 Minnesota St St. Paul MN, 55101-2131 United States	Electronic Service		Yes	23-518Official
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