

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

Katie Sieben	Chair
Valerie Means	Commissioner
Matthew Schuerger	Commissioner
Joseph Sullivan	Commissioner
John Tuma	Commissioner

In the Matter of an Inquiry into Utility Investments that May Assist in Minnesota’s Economic Recovery from the COVID-19 Pandemic

Docket No. E,G999/CI-20-492

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

Docket No. E002/M-20-745

In the Matter of a Proposal by Northern States Power Company dba Xcel Energy for Authorization to Recover Costs for Investments that May Assist in Minnesota’s Economic Recovery from the COVID-19 Pandemic

Docket No. E,G-002/M-20-716

**Comments of the Citizens Utility Board of Minnesota**

**Introduction**

The Citizens Utility Board of Minnesota (“CUB”, “we”) appreciates the Public Utilities Commission’s (“PUC” or “the Commission”) efforts to facilitate discussion on the economic effects of COVID-19 and the role regulated utilities can play in these unprecedented times. CUB believes utilities have an important opportunity to assist in economic recovery efforts that benefit Minnesota residents and businesses impacted by the pandemic. We appreciate the opportunity to participate in this docket to help ensure those efforts are as impactful as possible. A great deal of information has been presented in this docket and related dockets. Though we are not able to comment on the details of utilities’ filings at this stage, we share below some observations and recommendations that we hope will help the Commission achieve its intentions in opening this docket.

CUB echoes other commenters<sup>1</sup> in recommending that the Commission and utilities proactively consider how economic development initiatives address inequities in Minnesota. We generally recommend that the Commission prioritize approval and/or acceleration of initiatives that have a clear, measurable impact for those communities who are negatively affected by current and historical economic conditions that these

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<sup>1</sup> See, e.g., Comments of NATIVE SUN COMMUNITY POWER DEVELOPMENT, MN350, ST. PAUL 350, SIERRA CLUB, CMEJ, COMMUNITY POWER, MN RENEWABLE NOW, ALLIANCE FOR METROPOLITAN STABILITY, COPAL, MEP, MINNEAPOLIS CLIMATE ACTION, NAMC, UCS, TAKEACTION MN, et al, Docket No. 20-492 (Aug. 31, 2020, as amended Sept. 15, 2020) (“Combined Advocates’ Comments”); Comments of numerous individuals sent by email to MN\_PUC\_PublicAdvisor (each as filed by PUC), Docket No. 20-492; Comments of Jamez Staples, Docket No. 20-492 (Oct. 1, 2020).

investments seek to mitigate. Likewise, we recommend that the Commission not approve or accelerate projects that are likely to reinforce or contribute to existing inequities.

**1. Economic recovery efforts should proactively consider inequities to ensure benefits apply to all Minnesotans — and particularly those disproportionately impacted by the pandemic.**

We understand that the PUC's request for comments in this docket is fundamentally intended to address the serious economic hardships caused by the COVID-19 crisis.<sup>2</sup> To do that requires understanding how the current economic downturn has affected Minnesota's economy and residents, and in particular the disparate ways in which it affects our communities.

COVID-19 has thrown Minnesota and the nation into an economic recession, with job losses at one point hitting nearly 20% of Minnesotans.<sup>3</sup> By August 2020, Minnesota's unemployment rate had fallen to a seasonally adjusted 7.4% — less than the peak but still significantly higher than the 2.9% unemployment rate in March.<sup>4</sup> The recession remains severe globally. With COVID-19 not yet under control in the United States (cases are rising, especially in the upper Midwest<sup>5</sup>) we can expect that its effects will continue to hit Minnesota for some time to come.

Moreover, the recession is not affecting all Americans equally. To the contrary, the Washington Post has stated: "The covid-19 recession is the most unequal in modern U.S. history."<sup>6</sup> While this period has been stressful for everyone, many middle-class individuals have been able to transition to working from home, meanwhile continuing to collect their full salary while reducing their exposure to COVID-19. Nationwide, COVID is overwhelmingly affecting low-wage, minority workers most.

Likewise, numerous reports show that the COVID-19 pandemic has disproportionately affected low-income Minnesotans and Minnesotans who are Black, Indigenous and People of Color (BIPOC). For example:

- BIPOC Minnesotans account for about 43% of all COVID-19 cases in Minnesota, despite only making up about 20% of Minnesota's population.<sup>7</sup>
- Around 4,545 of every 100,000 Black Minnesotans, around 1,375 of every 100,000 American Indian/Alaska Native residents of Minnesota, and around 5,971 out of every 100,000 Latinx Minnesotans have tested positive for COVID-19, as compared to around 1,226 of every 100,000 White Minnesotans.<sup>8</sup>

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<sup>2</sup> See, Minnesota Public Utilities Commission, Notice of Reporting Required by Utilities, Docket No. E,G-999/CI-20-492 (May 20, 2020) at 2 (citing Commissioner Joseph K. Sullivan, Memoranda, Docket No. E, G-999/CI-20-425 (May 5, 2020)).

<sup>3</sup> Adam Belz, "Job losses hitting nearly 20% of Minnesota workers," Star Tribune (April 16, 2020), available at <https://www.startribune.com/minnesota-jobless-rate-nears-20-though-precise-figure-is-elusive/569696822/>.

<sup>4</sup> Minnesota Department of Employment and Economic Development (DEED), State and National Employment and Unemployment - Current Data (as of Oct. 13, 2020), available at <https://mn.gov/deed/data/current-econ-highlights/state-national-employment.jsp>.

<sup>5</sup> Centers for Disease Control and Prevention, CDC Covid Data Tracker, <https://covid.cdc.gov/covid-data-tracker> (last accessed Oct. 14, 2020).

<sup>6</sup> Heather Long, Andrew Van Dam, Alyssa Fowers, and Leslie Shapiro, "The covid-19 recession is the most unequal in modern U.S. history," Washington Post (Sept. 30, 2020), available at <https://www.washingtonpost.com/graphics/2020/business/coronavirus-recession-equality/>.

<sup>7</sup> See generally, <https://mn.gov/covid19/data/covid-dashboard/index.jsp> (last accessed Oct. 15, 2020).

<sup>8</sup> Id.

- Around 124 of every 100,000 Black Minnesotans, around 184 of every 100,000 American Indian/Alaska Native Minnesotans, and around 103 out of every 100,000 Latinx Minnesotans have died from COVID-19, as compared to around 28 of every 100,000 White Minnesotans.<sup>9</sup>
- BIPOC Minnesotans account for over 30% of continued unemployment insurance claims, despite only making up 14% of the labor force.<sup>10</sup>
- Low-income Minnesotans (those who earn 100-199% of the federal poverty level) are 9% less likely to be able to work from home and 7% more vulnerable to layoffs resulting from COVID-19 than the population overall.<sup>11</sup>

These statistics suggest the pandemic has contributed to widening disparities in our communities that existed long before the onset of COVID-19. At the state level, Minnesota has some of the worst racial disparities in the nation, measured on multiple metrics.<sup>12</sup> For example:

- The median annual income for a Black family in the Twin Cities metro area is \$38,178, which is less than half of the median White family income of \$84,459.<sup>13</sup>
- Similarly, when considering Minnesota's population statewide, the median annual income (as of 2018) for a Black household is \$30,306, while the median income for a White household is \$66,979.<sup>14</sup>
- The unemployment rate for White Minnesotans in 2018 was 2.9%, as compared to 13.9% for American Indians, 7.6% for Black Minnesotans, 6.2% for Minnesotans of two or more races, and 5.7% for Hispanic or Latino Minnesotans.<sup>15</sup>
- In 2019, while people of color made up 20.6% of Minnesota's overall population, they held only 14.9% of total jobs in Minnesota.<sup>16</sup>
- As of 2017, White Minnesotans accounted for nearly 95% of all business ownership in Minnesota, with only about 1% of businesses owned by Black Minnesotans, 1% owned by Hispanic or Latino Minnesotans, and less than 0.5% of businesses owned by American Indians. By comparison, about 19% of all classifiable firms nationwide were minority-owned that year.<sup>17</sup>

We also note that Minnesota is quickly becoming more racially diverse. According to U.S. Census data, Minnesota's population of Black or African Americans, persons of Hispanic or Latino origin, and persons of two or more races all grew by over 110% from 2000-2018, far outpacing the growth rate for each of these

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<sup>9</sup> Id.

<sup>10</sup> Id.

<sup>11</sup> Id.

<sup>12</sup> Hannah Jones, "Minnesota still has some of the worst racial disparities in the nation," CityPages.com (Jan. 16, 2019), available at <http://www.citypages.com/news/minnesota-still-has-some-of-the-worst-racial-disparities-in-the-nation/504390741>.

<sup>13</sup> Greg Rosalsky, "Minneapolis Ranks Near the Bottom for Racial Equality," NPR.org (June 2, 2020), available at <https://www.npr.org/sections/money/2020/06/02/867195676/minneapolis-ranks-near-the-bottom-for-racial-equality>.

<sup>14</sup> "Analysis Shows Great Disparities Between Black and Whites In Minnesota, CBS Minnesota (Jan. 16, 2019), available at <https://minnesota.cbslocal.com/2019/01/16/racial-integration-list-minnesota-racial-progress-wallethub/>.

<sup>15</sup> Minnesota Department of Employment and Economic Development, "Minnesota Economic Disparities by Race and Origin," mn.gov/deed (last accessed Oct. 9, 2020) at 1 (citing U.S. Census Bureau, 2018 American Community Survey, 1-Year estimates), available at [https://mn.gov/deed/assets/061020\\_MN\\_disparities\\_final\\_tcm1045-435939.pdf](https://mn.gov/deed/assets/061020_MN_disparities_final_tcm1045-435939.pdf).

<sup>16</sup> Id. at 3.

<sup>17</sup> Id. at 4.

groups in the country as a whole.<sup>18</sup> According to the Minnesota Department of Employment and Economic Development (“DEED”), every non-White racial group tracked by the U.S. Census over that time period grew at a rate much faster than that of Minnesota’s White population.<sup>19</sup>

The current economic crisis has been described by many as a tale of two economies. On the one side, many middle- and upper-income workers have largely transitioned to working at home — not without challenges, to be sure, but with minimal if any salary losses. A large portion of people who were laid off early in the COVID crisis have returned to work. On the other side, jobless numbers remain high, especially among communities who have long been left out of economic opportunities.

Any initiative designed to spur economic recovery would, in our view, be woefully inadequate without acknowledging the inequities described above. Indeed, we are concerned that, if the Commission and utilities are *not* proactive and intentional about considering these inequities, well-intentioned economic development initiatives may inadvertently contribute to deepening the inequities that are deeply-rooted in Minnesota’s economy, rather than helping those Minnesotans who need it most.

**2. The Commission should prioritize projects that address and diminish inequities, not that contribute to or reinforce inequities.**

In its August 12, 2020 Notice of Comment Period, the Commission requests comments on the process it should use to evaluate the filings by Utilities of investments.<sup>20</sup> For the reasons discussed in Part 1, and to avoid transferring risks or imprudent costs to ratepayers as a whole by shortcutting review, we see a need to approach this docket with some caution. By its nature, the docket is designed to shorten typical utility regulatory processes and procedures. With limited time and resources, CUB has the capacity to review only a very small portion of what has been proposed, and even then, not very thoroughly. We imagine that other commenters, and perhaps Commission staff, find themselves in a similar position.

We reiterate our recommendation that the Commission prioritize the approval and/or acceleration of those initiatives that have a clear, measurable impact on reducing inequities and that the Commission not approve projects likely to reinforce or contribute to existing inequities. We also acknowledge that we lack expertise in economic development policy and analysis, and in the complex socioeconomic, historic, and political factors that have contributed to racial inequities over numerous years. Therefore, we have intentionally focused our comments on areas where we *do* have some expertise and where we see opportunity for utilities to take tangible steps to confront and address inequities head-on as part of the broader economic development goals and initiatives discussed here. We recommend that the Commission carefully consider comments filed by other stakeholders who offer their unique expertise — including on those complex factors that contribute to underlying inequities — to contribute further to this discussion.

A. Initiatives that address inequities

We acknowledge and commend utilities for the actions they have already taken to help soften the blow on ratepayers struggling to make ends meet as they experience job losses, shuttered businesses, illness, loss of loved ones, and general uncertainty in recent months. Many of these actions have had, and continue to have, measurable, positive impacts on Minnesotans of all races and income groups who are struggling through the effects COVID-19. For example, even before the PUC’s shutoff moratorium order, regulated

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<sup>18</sup> Id. at 1.

<sup>19</sup> Id.

<sup>20</sup> Minnesota Public Utilities Commission, Notice of Comment Period, Docket No. E,G-999/CI-20-492 (Aug. 12, 2020) at 1.

utilities suspended disconnections and fees that would otherwise apply to ratepayers who are delinquent on payments. Xcel Energy has proposed increasing energy conservation opportunities for low-income households and businesses who are rebuilding after the unrest following the killing of George Floyd.<sup>21</sup> Minnesota Power has proposed numerous rate mitigation ideas (each of which CUB needs to review in more detail before offering more specific comments or recommendations), which the company describes as “intended to maintain the affordability of electric rates while Minnesota Power advances decarbonization efforts and customers continue to bear the economic impacts of the COVID-19 pandemic and recession.”<sup>22</sup> Against this backdrop, we recommend the Commission approve and accelerate the following types of initiatives as those most likely to generate economic recovery in an equitable way.

i. *Workforce development*

In conversations CUB has had with stakeholders interested in this docket, workforce development is a consistent topic raised as warranting utilities’ further consideration. We also note that considerable work has already been done to study workforce inequities in the energy and utilities sectors. That work forms a foundation that utilities should build upon when proposing initiatives in this docket.

a. Minneapolis Renewable Electricity and Energy Efficiency Workforce Assessment

In late 2018, the National Association of State Energy Officials (“NASEO”), the Energy Futures Initiative (“EFI”) and BW Research Partnership (“BW Research”) partnered with the City of Minneapolis Offices of Sustainability and Community Planning and Economic Development (“CPED”) to undertake a Minneapolis Renewable Electricity and Energy Efficiency Workforce Assessment. This group published a report in May 2019 titled, “Minneapolis Renewable Electricity and Energy Efficiency Workforce Assessment.”<sup>23</sup> The Workforce Assessment found that the current size of the workforce may be insufficient to achieve the City’s clean energy and climate goals. Not surprisingly, the Assessment also identified significant racial disparities in Minneapolis’s energy workforce.<sup>24</sup> The Assessment highlights the opportunities for entrepreneurship, employment, and workforce development created as a result of the City’s goals.<sup>25</sup> However, it also suggests that such opportunities will not apply equally to historically underserved and disadvantaged populations in Minneapolis without the cooperation of local energy utilities (in this case, Xcel and CenterPoint).<sup>26</sup> The Workforce Assessment identifies numerous, concrete opportunities where the City could combat inequities, so long as area utilities cooperate in those efforts. For example:

- Utilities could provide financial assistance or stipends to disadvantaged and income-limited residents to participate in training programs in core fields such as carpentry, insulation, demolition, or electrical work, that can ultimately lead into clean energy occupations.<sup>27</sup>

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<sup>21</sup> Xcel Energy, Report – COVID-19 Relief & Recovery, Docket No. E,G999/CI-20-492 (June 17, 2020) (“Xcel Report”), at 18.

<sup>22</sup> Minnesota Power, Supplemental Report, Docket No. E,G999/CI-20-492 (Aug. 31, 2020) at 1.

<sup>23</sup> Sandy Fazeli & David Foster, “Minneapolis Renewable Electricity and Energy Efficiency Workforce Assessment “(“Workforce Assessment”) (May 2019), available at <https://naseo.org/data/sites/1/documents/publications/Minneapolis%20Workforce%20Development%20Assessment.pdf>.

<sup>24</sup> Id. at 13.

<sup>25</sup> Id. at 14.

<sup>26</sup> Id. at 14.

<sup>27</sup> Id. at 16.

- Utilities could cooperate with each other and major employers (such as large construction or energy firms) to consider establishing a common or coordinated goals framework for diverse hiring and recruitment practices.<sup>28</sup>
- Utilities could review franchise agreements and project labor agreements to ensure they include hiring and diversity goals for the utility and/or affirmative action provisions requiring or incentivizing the hiring of women, minorities, and other protected class members.<sup>29</sup>

#### b. Energy Utility Diversity Stakeholder Group Report

The Energy Utility Diversity Stakeholder Group Report submitted on January 15, 2020 (the “EUDG Report”) also includes numerous findings identifying inequities in the workforce servicing Minnesota’s utility and energy industries.<sup>30</sup> This report was prepared in accordance with Minnesota Law<sup>31</sup> directing the Commission to convene a stakeholder group to “examine the challenges and opportunities for Minnesota’s energy utilities to attract a diverse workforce with the skills needed to advance a 21st century industry and to increase supplier diversity of energy utilities.”<sup>32</sup> Among other recommendations, the Report recommends that utilities build and maintain relationships with targeted schools and populations to build early pipelines to young people interested in pursuing careers in the energy industry; establish, expand, and maintain supplier diversity programs and collaborate with other utilities that have such programs to share lists of diverse suppliers; and analyze utilities’ own hiring requirements to remove existing barriers to applicants from underrepresented communities.<sup>33</sup>

#### c. Workforce development in this docket

The reports cited above show that considerable work has already been done to study workforce development opportunities that could benefit Minnesota’s BIPOC communities and utilities themselves. It would be an opportunity wasted to not build off this work when considering the initiatives proposed in this docket. Therefore, we encourage the Commission to prioritize approval of workforce development-related initiatives.

For example, while we have not analyzed these proposals in detail, Xcel’s efforts to work with the Center for Energy and Environment (“CEE”) on “a proposal to specifically target the Areas of Concentrated Poverty (“ACP 50”) zones of St. Paul, the designated green zones in Minneapolis, and the areas directly impacted by the recent civil unrest (parts of South and North Minneapolis, and the St. Paul Midway)” is a promising project,<sup>34</sup> as is CenterPoint Energy’s proposed \$1 million in investments focused on workforce development, including developing additional air sealing and insulation professionals.<sup>35</sup> We applaud CenterPoint for devoting a portion of this investment towards increasing the number of minority and women-owned businesses doing energy efficiency work and increasing the diversity of energy efficiency tradespeople in

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<sup>28</sup> Id. at 21.

<sup>29</sup> Id. at 21-22.

<sup>30</sup> Id. at 4.

<sup>31</sup> Minnesota Session Laws, 2019, First Special Session, Chapter 7, Article 11, Section 13.

<sup>32</sup> EUDG Committee & Karen DeYoung, Energy Utility Diversity Stakeholder Group Report (Jan. 15, 2020) (“EUDG Report”) at 1, available at <https://www.leg.mn.gov/docs/2020/mandated/200077.pdf>.

<sup>33</sup> Id. at 4-5.

<sup>34</sup> Xcel Report at 18.

<sup>35</sup> CenterPoint Energy, Compliance Filing, Docket No. E,G999/CI-20-492 (Sept. 15, 2020), at 4.

CenterPoint's service area. However, as other commenters suggest,<sup>36</sup> 20% of the investment, as proposed, will probably not be sufficient to remedy the under-employment of minorities and women, who comprise approximately 60% of the state's population. We recommend that workforce development centers advanced in this proceeding be located in areas with high concentrations of Minnesotans who are BIPOC and/or who have been negatively affected by the COVID-19 pandemic.

We also acknowledge Minnesota Energy Resources Corporation ("MERC") and Xcel for highlighting their existing supplier diversity initiatives and their proposals for enhancing those initiatives.<sup>37</sup> That said, comments made by both companies (and the general lack of comments referencing supplier diversity in other utilities' filings) suggest more can be done in this area to follow the recommendations of the EUDG Report. For example, MERC notes that "work performed in the field on behalf of MERC is primarily done by third-party contractors" and that "there can be constraints on the quantity of work completed [...] if the available work force is limited due to competing demands for [contractors'] services."<sup>38</sup> Moreover, though Xcel repeatedly references its commitment to supplier diversity, it offers few details supporting how that commitment is implemented and measured in practice. Indeed, the only details Xcel includes in its filings to date is a commitment, to the extent proposed investments involve a competitive bidding process, to "include additional points toward bidders who include the use of woman, veteran, or minority owned businesses."<sup>39</sup>

These observations highlight two problems we have heard raised in discussions with other stakeholders: (1) supplier diversity initiatives are less effective if utilities are not proactively engaged in long-term strategies to bring members of underrepresented communities into the workforce and to build and maintain meaningful, enduring relationships with multiple suppliers that are owned by, and/or make sustained efforts to employ, members of such underrepresented communities; and (2) written commitments to workforce and supplier diversity are, alone, ineffective if utilities are not measuring whether/how they meet those commitments. We encourage the Commission and utilities to advance and prioritize supplier diversity initiatives that meaningfully build off the concrete recommendations in the EUDG Report and that measure utilities' ability to honor their expressed commitments to supplier diversity, including with reporting on projects approved through this and related dockets.

## ii. *Arrearage Forgiveness/Rate Relief*

Another area where utilities can have an immediate impact is helping to address significant arrearages some residential customers are accumulating while unemployed or experiencing other financial hardships during the pandemic. We particularly support Xcel's Payment Plan Credit proposal, whereby Xcel proposes a relief measure for residential electric customers whose arrears (1) have continued to grow during the pandemic and (2) are large enough to be most at risk of permanently falling behind in their payments.<sup>40</sup> Xcel notes that the program will provide up to \$17.5 million in bill credits over a period of two years.<sup>41</sup> (CUB intends

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<sup>36</sup> See, e.g., Combined Advocates' Comments at 2 (suggesting "a 20 percent threshold might produce *equality* in economic development but would be grossly inadequate to further *equity*").

<sup>37</sup> See, Minnesota Energy Resources, Comments - September 2020 First Tranche Filing, Docket No. E,G-999/CI-20-492 (June 17, 2020) (highlighting the WEC Energy Group, Inc.'s "Supplier Diversity Initiative") at 3; Xcel Report at 7.

<sup>38</sup> Minnesota Energy Resources, Comments - September 2020 First Tranche Filing, Docket No. E,G-999/CI-20-492 (Sept. 15, 2020) at 3.

<sup>39</sup> Xcel Report at 10, 12, 14.

<sup>40</sup> Xcel Energy, Response and Petition - COVID-10 Relief & Recovery, Docket No. E,G999/CI-20-492 (Sept. 15, 2020) ("Xcel Response and Petition") at 27.

<sup>41</sup> *Id.*

to comment further on this proposal on November 6, 2020, pursuant to the Commission's notice for comment in Docket 20-760.)

Other utilities should consider offering programs similar to Xcel's Payment Plan Credit proposal. Moreover, utilities that do not yet do so should consider adopting low-income rate programs as a standard offering, now and after the COVID-19 crisis has passed. CUB has had initial conversations with one utility regarding the possibility of offering an income-qualified discount rate, and we hope to be able to report further on this idea in reply comments.

These types of programs can provide crucial, immediate relief to struggling households. CUB recommends that they be among the Commission's priorities for action in this and/or the related Docket No. 20-375 addressing the Commission's inquiry into utility actions related to service and disconnections during the COVID-19 pandemic.

#### B. Initiatives that may reinforce or contribute to inequities

Certain initiatives could contribute to existing inequities, rather than to improving Minnesota's current economic situation. While we have not had the ability to review all of the proposals offered in utility filings in this docket, Xcel's proposed electric vehicle rebates stood out as an example of an initiative that is unreasonable and/or likely to primarily benefit higher-income ratepayers who are not facing economic hardships.

Among its Tranche 1 proposals, Xcel proposes establishing rebates for those purchasing electric vehicles ("EVs"), including both private vehicles and transit buses. We recognize that electrification of transportation can provide benefits not only to EV drivers but to all ratepayers, as EVs taking clean, off-peak electricity can reduce costs across the system. Moreover, electrifying transportation can reduce both greenhouse gas emissions and local air pollution. However, CUB has numerous concerns about Xcel's proposals.

First, we are concerned that rebates for individuals purchasing new or used electric vehicles will disproportionately benefit higher-income ratepayers. Individuals or households who purchase vehicles — especially new vehicles — are less likely to be experiencing economic hardship. Also, according to data collected by National Equity Atlas, 15% of households of color in Minnesota did not have access to a vehicle in 2017, as compared to 6% of White households without access to a vehicle.<sup>42</sup> Despite low-income or BIPOC Minnesotans being less likely than higher-income (more often White) Minnesotans to purchase electric vehicles, cost recovery spread among all Xcel ratepayers will require lower-income and BIPOC ratepayers to help pay for the rebates.

We are also concerned about the rebates offered for buses. The transit bus rebate starts at \$1 million per bus, despite (in our understanding) a new electric bus being available for closer to \$700,000.<sup>43</sup> Xcel proposes school bus rebates starting at \$275,000 or \$325,000 (depending on whether the bus is a V2G model), though

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<sup>42</sup> National Equity Atlas, [www.nationalequityatlas.org](http://www.nationalequityatlas.org) (last accessed Oct. 9, 2020), available at [https://nationalequityatlas.org/indicators/Car\\_access#/?geo=0200000000027000](https://nationalequityatlas.org/indicators/Car_access#/?geo=0200000000027000).

<sup>43</sup> See, e.g., Justin George, "Metro lags behind other big transit systems in converting its bus fleet to electric, Sierra Club report says," THE WASHINGTON POST (Oct. 1 2020) ("Gas-powered buses from New Flyer of America, a builder of Metrobuses, start at \$450,000, while electric versions start at \$700,000"), available at <https://www.washingtonpost.com/transportation/2020/10/01/metro-lags-behind-other-big-transit-systems-converting-its-bus-fleet-electric-sierra-club-report-says/>.

it estimates the entire cost of a new electric school bus at just \$350,000.<sup>44</sup> Xcel does not provide information to justify such high rebates.

We are also concerned that Xcel seems to earn a return on the rebate amounts.<sup>45</sup> Given the investment's purpose to improve economic conditions during this recession, such a return seems inappropriate.

Finally, there is no evidence that these electric vehicle investments will be placed where they can have the largest benefits: in areas with high levels of particulate and other air pollution, which often correlate with areas of lower income and higher portions of BIPOC residents.

CUB recommends that the Commission decline to approve these EV projects in this docket. Alternatively, if the Commission wishes to move these projects forward, we recommend that electric transit and school buses be placed in service in routes with high levels of air pollution, that the bus rebate amounts be reduced, and that the Commission consider an income qualification for light-duty EV rebates.

## **Conclusion**

In summary, we again thank the Commission and utilities for their efforts to identify opportunities to contribute to Minnesota's economic recovery during these difficult, unprecedented times. We are encouraged by many of the initiatives discussed in this docket, and by the engagement of numerous stakeholders sharing comments on those initiatives. That said, we recommend that the Commission and utilities be proactive and intentional in prioritizing those initiatives that respond to the real economic hardships that have been created and exacerbated by the COVID-19 pandemic, and exercise caution in accelerating investments whose effects on impacted communities are unclear. Failure to do so may inadvertently cause well-intentioned initiatives to further enhance deeply-rooted inequities, rather than help Minnesotans in greatest need. We are continuing to review the proposals identified in utilities' filings, and we may provide additional comments in reply comments.

Thank you for your consideration.

Sincerely,

/s/ Annie Levenson-Falk  
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October 16, 2020

/s/ Brian Edstrom  
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<sup>44</sup> See Xcel Energy, Response to CUB-MN Information Request No. 11, Docket No. E,G-999/CI-20-492 (September 24, 2020), enclosed as Attachment A.

<sup>45</sup> See Xcel Response and Petition at Attachment C, page 10.

- Not Public Document – Not For Public Disclosure
- Public Document – Not Public Data Has Been Excised
- Public Document

Xcel Energy Information Request No. 11  
Docket No.: E,G-999/CI-20-492  
Response To: Citizens Utility Board  
Requestor: Brian Edstrom  
Date Received: September 24, 2020

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Question:

Reference: Xcel Comments, electric vehicle proposals (pages 15-18 and Attachment C)

- a. Reference Attachment C, Table 2: Electric Transit Bus and School Bus Rebates by Year
  - i. How did Xcel determine the proposed rebate amounts for transit buses, school buses (V2G), and school buses (non-V2G)?
  - ii. What is the purchase price of an electric transit bus to Metro Transit and to other transit agencies? If the Company is not aware of actual purchase prices, provide an estimate.
  - iii. What is the purchase price of electric school buses (V2G and non-V2G models) to Minnesota school districts? If the Company is not aware of actual purchase prices, provide an estimate.
- b. Share any information Xcel is aware of regarding where electric transit or school buses would be put in place should this program be approved, including specific Metro Transit routes, school districts, and school bus routes.
- c. Provide detailed cost-benefit analyses of each of the EV programs proposed in this filing.
- d. How do the results of the Company’s cost-benefit analyses of each of the EV programs proposed in this filing compare to that of existing Xcel EV pilots or programs?

Response:

- a(i) *Proposed Rebates.* The Company determined the proposed rebate amounts for electric transit buses and electric school buses based on what we believe is necessary to incentivize strong efforts at transportation electrification over the next few years, while also balancing the costs involved in order to create benefits for transit operators, school bus operators, our electric customers, and the State of Minnesota. Part of developing the proposed rebate levels for electric transit buses stem from conversations with Metro Transit and the desire to strike an appropriate balance between strong upfront incentives to encourage economic recovery and electrification and declining rebates over time as the market develops in order to reduce the costs of the program.

We developed the school bus rebates with the same goals in mind. The specific rebates proposed for non-V2G electric school buses are designed to offset the incremental costs of electric school buses and associated charging equipment and mirror the maximum award announced for the Minnesota Pollution Control Agency's electric school bus pilot in the near-term in an effort to complement state efforts on school bus electrification. The proposed V2G electric school bus rebate is designed to offer a larger award in order to incentivize school bus operators to participate in a future program that will require additional coordination and collaboration with the Company on charging schedules, preferences, and parameters.

- a(ii) *Transit Bus Prices.* The Company estimates that the purchase price of an electric transit bus can average between roughly \$800,000 and \$1.3 million, depending on the length of the bus and other features. The price of associated charging equipment to provide garage and on-route charging for each bus can add another approximately \$250,000 in costs. This compares to costs of about \$500,000 to \$850,000 for a diesel transit bus, depending on the length of the bus.
- a(iii) *School Bus Prices.* The purchase price of an electric school bus is approximately \$350,000. This compares to about \$140,000 for a diesel bus. The purchase price of a V2G enabled bus and non-V2G-enabled bus does not differ greatly, as the leading bus manufacturers allow for bi-directional charging in new models; the cost difference for these two alternatives stems from the charging equipment and infrastructure investment required to allow for V2G, which can cost between an additional \$30,000 - \$50,000 compared to non-V2G charging infrastructure.
- b. Given past discussions, the Company is generally aware of Metro Transit's interest in electrifying buses housed at various Minneapolis and St Paul garages, but does not know the specific routes that Metro Transit may decide to offer

electric service in the future. Similarly, the Company has had discussions with the Bloomington, Edina, and Saint Cloud school districts Schmitt and Sons bus operators, who have expressed an interest in electric school bus programs. However, the Company is not certain which specific transit operators and school districts may take advantage of the Company's proposed electric bus rebates or on which bus routes the resulting electric buses may focus, should this program be approved.

- c-d. Given the expedited nature of this docket and the Commission's request for proposals to rapidly contribute to the relief and recovery of Minnesota's economy, the Company has not conducted an in-depth analysis quantifying costs and benefits for each of the proposed EV programs. In Attachment C of our September 15, 2020 filing, however, we presented a high-level cost-benefit analysis discussing the benefits of our EV rebate proposal,<sup>1</sup> including results for the electrification of light-duty and heavy-duty vehicles from a study conducted in the spring of 2020 for Xcel Energy-Colorado.

Those results show significant net benefits for drivers, electric customers, and society as a whole from vehicle electrification, as also demonstrated in other cost-benefit studies in Minnesota and around the country on vehicle electrification. Indeed, as the Commission has identified, "EVs have the potential to deliver a variety of benefits to Minnesota, especially environmental and public health benefits. Replacing fossil fuel powered vehicles with EVs can reduce greenhouse gas and other harmful emissions, especially as the rise of EVs coincides with the rise of renewable energy and the decline in coal-fired electric generation. [...] By using more electricity, EVs can benefit all ratepayers."<sup>2</sup> For this and other reasons, it requested utilities "Develop and file EV-related proposals intended to encourage the adoption of EVs by [...] [f]acilitating the electrification of vehicle fleets."<sup>3</sup>

The Company's EV proposals seek to bring about these lasting benefits for customers and for Minnesota. The Company believes that our proposals can help to speed up the transition to electric vehicles and hasten the arrival of these benefits. The EV proposals in this filing seek to incentivize the purchase of electric transportation options across market segments, reduce range anxiety for drivers, and help to encourage vehicle charging at times that are beneficial for the grid.

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<sup>1</sup> We do not believe our other proposals require a cost-benefit analysis under the Commission's February 1, 2019, Order in Docket No. E-999/CI-17-879, and consequently have not conducted any such analyses.

<sup>2</sup> ORDER MAKING FINDINGS AND REQUIRING FILINGS, In the Matter of a Commission Inquiry into Electric Vehicle Charging and Infrastructure, Docket No. E-999/CI-17-879, February 1, 2019.

<sup>3</sup> *Id.*

When viewed holistically, they can support increased EV adoption in the near-term to help Minnesota realize the benefits offered from widespread electric transportation. The Company believes that any analysis that sought to estimate the incremental EV adoption that may result from the EV proposals would have a high degree of uncertainty and would risk creating a false sense of precision. As a result, the Company encourages a more general and longer-term approach of considering the benefits of electric transportation and what programs can help support a market transformation.

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Heidi	Corcoran	Heidi.Corcoran@CO.DAKO TA.MN.US	Dakota County	N/A	Electronic Service	No	OFF_SL_20-745_M-20-745
Hillary	Creurer	hcreurer@allete.com	Minnesota Power	30 W Superior St  Duluth, MN 55802	Electronic Service	No	OFF_SL_20-745_M-20-745
George	Crocker	gwillc@nawo.org	North American Water Office	PO Box 174  Lake Elmo, MN 55042	Electronic Service	No	OFF_SL_20-745_M-20-745
Timothy	DenHerder Thomas	timothy@cooperativeenerg yfutures.com	Cooperative Energy Futures	3500 Bloomington Ave. S  Minneapolis, MN 55407	Electronic Service	No	OFF_SL_20-745_M-20-745
Elizabeth	Dickinson	eadickinson@mindspring.c om	Community Power	2720 E 22nd St  Minneapolis, MN 55406	Electronic Service	No	OFF_SL_20-745_M-20-745
Bridget	Dockter	Bridget.Dockter@xcelenerg y.com		N/A	Electronic Service	No	OFF_SL_20-745_M-20-745
Marie	Doyle	marie.doyle@centerpointen ergy.com	CenterPoint Energy	505 Nicollet Mall P O Box 59038 Minneapolis, MN 554590038	Electronic Service	No	OFF_SL_20-745_M-20-745
Michelle	Dreier	mdreier@electricalassociati on.com		N/A	Electronic Service	No	OFF_SL_20-745_M-20-745
Ron	Elwood	relwood@mnlsap.org	Mid-Minnesota Legal Aid	2324 University Ave Ste 101  Saint Paul, MN 55114	Electronic Service	No	OFF_SL_20-745_M-20-745
James C.	Erickson	jericksonkbc@gmail.com	Kelly Bay Consulting	17 Quechee St  Superior, WI 54880-4421	Electronic Service	No	OFF_SL_20-745_M-20-745

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
John	Farrell	jfarrell@ilsr.org	Institute for Local Self-Reliance	2720 E. 22nd St Institute for Local Self-Reliance Minneapolis, MN 55406	Electronic Service	No	OFF_SL_20-745_M-20-745
Eric	Fehlhaber	efehlhaber@dakotaelectric.com	Dakota Electric Association	4300 220th St W  Farmington, MN 55024	Electronic Service	No	OFF_SL_20-745_M-20-745
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_20-745_M-20-745
Daryll	Fuentes	dfuentes@usg.com	USG Corporation	550 W Adams St  Chicago, IL 60661	Electronic Service	No	OFF_SL_20-745_M-20-745
Brian	Gardow	bgardow@greatermngas.com	Greater Minnesota Gas, Inc. & Greater MN Transmission, LLC	1900 Cardinal Ln PO Box 798 Faribault, MN 55021	Electronic Service	No	OFF_SL_20-745_M-20-745
James	Garness	james.r.garness@xcelenergy.com		N/A	Electronic Service	No	OFF_SL_20-745_M-20-745
Edward	Garvey	edward.garvey@AESLconsulting.com	AESL Consulting	32 Lawton St  Saint Paul, MN 55102-2617	Electronic Service	No	OFF_SL_20-745_M-20-745
Bruce	Gerhardson	bgerhardson@otpc.com	Otter Tail Power Company	PO Box 496 215 S Cascade St Fergus Falls, MN 565380496	Electronic Service	No	OFF_SL_20-745_M-20-745
Janet	Gonzalez	Janet.gonzalez@state.mn.us	Public Utilities Commission	Suite 350 121 7th Place East St. Paul, MN 55101	Electronic Service	No	OFF_SL_20-745_M-20-745
Anita	Grace	Anita@gracemulticultural.com		N/A	Electronic Service	No	OFF_SL_20-745_M-20-745
Bill	Grant	billgrant@minncap.org	Minnesota Community Action Partnership	MCIT Building 100 Empire Dr Ste 202 St. Paul, MN 55103	Electronic Service	No	OFF_SL_20-745_M-20-745

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Erik	Hatlestad	erik@cureriver.org	Cure River	117 1st St  Montevideo, MN 56265	Electronic Service	No	OFF_SL_20-745_M-20-745
Kim	Havey	kim.havey@minneapolismn.gov	City of Minneapolis	350 South 5th Street, Suite 315M Minneapolis, MN 55415	Electronic Service	No	OFF_SL_20-745_M-20-745
Annete	Henkel	mui@mutilityinvestors.org	Minnesota Utility Investors	413 Wacouta Street #230 St. Paul, MN 55101	Electronic Service	No	OFF_SL_20-745_M-20-745
Shane	Henriksen	shane.henriksen@enbridge.com	Enbridge Energy Company, Inc.	1409 Hammond Ave FL 2  Superior, WI 54880	Electronic Service	No	OFF_SL_20-745_M-20-745
Corey	Hintz	chintz@dakotaelectric.com	Dakota Electric Association	4300 220th Street  Farmington, MN 550249583	Electronic Service	No	OFF_SL_20-745_M-20-745
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_20-745_M-20-745
MJ	Horner	mj.horner@xcelenergy.com		N/A	Electronic Service	No	OFF_SL_20-745_M-20-745

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Lori	Hoyum	lhoyum@mnpower.com	Minnesota Power	30 West Superior Street Duluth, MN 55802	Electronic Service	No	OFF_SL_20-745_M-20-745
Holmes	Hummel	Holmes.Hummel@CleanEnergyWorks.org	Clean Energy Works	925 French St NW Washington, DC 20001	Electronic Service	No	OFF_SL_20-745_M-20-745
Travis	Jacobson	travis.jacobson@mdu.com	Great Plains Natural Gas Company	400 N 4th St Bismarck, ND 58501	Electronic Service	No	OFF_SL_20-745_M-20-745
Alan	Jenkins	aj@jenkinsatlaw.com	Jenkins at Law	2950 Yellowtail Ave. Marathon, FL 33050	Electronic Service	No	OFF_SL_20-745_M-20-745
Richard	Johnson	Rick.Johnson@lawmoss.com	Moss & Barnett	150 S. 5th Street Suite 1200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-745_M-20-745
Sarah	Johnson Phillips	sarah.phillips@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-745_M-20-745
Brendan	Jordan	bjordan@gpisd.net	Great Plains Institute & Bioeconomy Coalition of MN	2801 21st Ave S Ste 220 Minneapolis, MN 55407	Electronic Service	No	OFF_SL_20-745_M-20-745
Mark J.	Kaufman	mkaufman@ibewlocal949.org	IBEW Local Union 949	12908 Nicollet Avenue South Burnsville, MN 55337	Electronic Service	No	OFF_SL_20-745_M-20-745
Thomas	Koehler	TGK@IBEW160.org	Local Union #160, IBEW	2909 Anthony Ln St Anthony Village, MN 55418-3238	Electronic Service	No	OFF_SL_20-745_M-20-745

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Michael	Krikava	mkrikava@taftlaw.com	Taft Stettinius & Hollister LLP	2200 IDS Center 80 S 8th St Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-745_M-20-745
Nicolle	Kupser	nkupser@greatermngas.com	Greater Minnesota Gas, Inc. & Greater MN Transmission, LLC	1900 Cardinal Ln PO Box 798 Faribault, MN 55021	Electronic Service	No	OFF_SL_20-745_M-20-745
James D.	Larson	james.larson@avantenergy.com	Avant Energy Services	220 S 6th St Ste 1300  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-745_M-20-745
Douglas	Larson	dlarson@dakotaelectric.com	Dakota Electric Association	4300 220th St W  Farmington, MN 55024	Electronic Service	No	OFF_SL_20-745_M-20-745
Peder	Larson	plarson@larkinhoffman.com	Larkin Hoffman Daly & Lindgren, Ltd.	8300 Norman Center Drive Suite 1000 Bloomington, MN 55437	Electronic Service	No	OFF_SL_20-745_M-20-745
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Annie	Levenson Falk	annielf@cubminnesota.org	Citizens Utility Board of Minnesota	332 Minnesota Street, Suite W1360  St. Paul, MN 55101	Electronic Service	No	OFF_SL_20-745_M-20-745
Ryan	Long	ryan.j.long@xcelenergy.com	Xcel Energy	414 Nicollet Mall 401 8th Floor Minneapolis, MN 55401	Electronic Service	No	OFF_SL_20-745_M-20-745
Susan	Ludwig	sludwig@mnpower.com	Minnesota Power	30 West Superior Street  Duluth, MN 55802	Electronic Service	No	OFF_SL_20-745_M-20-745

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Kavita	Maini	kmaini@wi.rr.com	KM Energy Consulting, LLC	961 N Lost Woods Rd Oconomowoc, WI 53066	Electronic Service	No	OFF_SL_20-745_M-20-745
Nick	Mark	nick.mark@centerpointenergy.com	CenterPoint Energy	505 Nicollet Mall Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-745_M-20-745
Pam	Marshall	pam@energycents.org	Energy CENTS Coalition	823 7th St E St. Paul, MN 55106	Electronic Service	No	OFF_SL_20-745_M-20-745
Brian	Meloy	brian.meloy@stinson.com	STINSON LLP	50 S 6th St Ste 2600 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-745_M-20-745
Joseph	Meyer	joseph.meyer@ag.state.mn.us	Office of the Attorney General-RUD	Bremer Tower, Suite 1400 445 Minnesota Street St Paul, MN 55101-2131	Electronic Service	No	OFF_SL_20-745_M-20-745
Kevin	Miller	kevin.miller@chargepoint.com	ChargePoint, Inc.	254 E. Hacienda Avenue Campbell, California 95008	Electronic Service	No	OFF_SL_20-745_M-20-745
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David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022093	Electronic Service	No	OFF_SL_20-745_M-20-745
Marc	Monbouquette	marc.monbouquette@enel.com	Enel X North America, Inc.	846 Bransten Rd San Carlos, CA 94070	Electronic Service	No	OFF_SL_20-745_M-20-745
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Mark	Nabong	mnabong@nrdc.org	Natural Resources Defense Council	20 N. Wacker Drive #1600  Chicago, IL 60606	Electronic Service	No	OFF_SL_20-745_M-20-745
David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency	220 South Sixth Street Suite 1300 Minneapolis, Minnesota 55402	Electronic Service	No	OFF_SL_20-745_M-20-745
Michael	Noble	noble@fresh-energy.org	Fresh Energy	Hamm Bldg., Suite 220 408 St. Peter Street St. Paul, MN 55102	Electronic Service	No	OFF_SL_20-745_M-20-745
Samantha	Norris	samanthanorris@alliantenergy.com	Interstate Power and Light Company	200 1st Street SE PO Box 351  Cedar Rapids, IA 524060351	Electronic Service	No	OFF_SL_20-745_M-20-745
Matthew	Olsen	molsen@otpc.com	Otter Tail Power Company	215 South Cascade Street  Fergus Falls, MN 56537	Electronic Service	No	OFF_SL_20-745_M-20-745
Debra	Opatz	dopatz@otpc.com	Otter Tail Power Company	215 South Cascade Street  Fergus Falls, MN 56537	Electronic Service	No	OFF_SL_20-745_M-20-745
Carol A.	Overland	overland@legalelectric.org	Legalelectric - Overland Law Office	1110 West Avenue  Red Wing, MN 55066	Electronic Service	No	OFF_SL_20-745_M-20-745
John	Pacheco	johnpachecojr@gmail.com		N/A	Electronic Service	No	OFF_SL_20-745_M-20-745
Greg	Palmer	gpalmer@greatermngas.com	Greater Minnesota Gas, Inc. & Greater MN Transmission, LLC	1900 Cardinal Ln PO Box 798 Faribault, MN 55021	Electronic Service	No	OFF_SL_20-745_M-20-745
Ben	Passer	Passer@fresh-energy.org	Fresh Energy	408 St. Peter Street Ste 220  Saint Paul, MN 55102	Electronic Service	No	OFF_SL_20-745_M-20-745
Jose	Perez	jose@hispanicsinenergy.com		N/A	Electronic Service	No	OFF_SL_20-745_M-20-745

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Jennifer	Peterson	jjpeterson@mnpower.com	Minnesota Power	30 West Superior Street  Duluth, MN 55802	Electronic Service	No	OFF_SL_20-745_M-20-745
Catherine	Phillips	Catherine.Phillips@wecenergygroup.com	Minnesota Energy Resources	231 West Michigan St  Milwaukee, WI 53203	Electronic Service	No	OFF_SL_20-745_M-20-745
Marcia	Podratz	mpodratz@mnpower.com	Minnesota Power	30 W Superior S  Duluth, MN 55802	Electronic Service	No	OFF_SL_20-745_M-20-745
Kevin	Pranis	kpranis@liunagro.com	Laborers' District Council of MN and ND	81 E Little Canada Road  St. Paul, Minnesota 55117	Electronic Service	No	OFF_SL_20-745_M-20-745
David G.	Prazak	dprazak@otpc.com	Otter Tail Power Company	P.O. Box 496 215 South Cascade Street Fergus Falls, MN 565380496	Electronic Service	No	OFF_SL_20-745_M-20-745
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_20-745_M-20-745
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_20-745_M-20-745
Susan	Romans	sromans@allete.com	Minnesota Power	30 West Superior Street Legal Dept Duluth, MN 55802	Electronic Service	No	OFF_SL_20-745_M-20-745
Richard	Savelkoul	rsavelkoul@martinsquires.com	Martin & Squires, P.A.	332 Minnesota Street Ste W2750  St. Paul, MN 55101	Electronic Service	No	OFF_SL_20-745_M-20-745
Tim	Schaefer	tschaefer@environmentminnesota.org	Environment MN	211 N 1st St Ste 480  Minneapolis, MN 55401	Electronic Service	No	OFF_SL_20-745_M-20-745

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Elizabeth	Schmiesing	eschmiesing@winthrop.com	Winthrop & Weinstine, P.A.	225 South Sixth Street Suite 3500 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-745_M-20-745
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th PI E Ste 350  Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_20-745_M-20-745
Timothy	Sexton	Timothy.Sexton@state.mn.us	Minnesota Department of Transportation	395 John Ireland Blvd #620  St. Paul, MN 55155-1899	Electronic Service	No	OFF_SL_20-745_M-20-745
Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates	7400 Lyndale Ave S Ste 190  Richfield, MN 55423	Electronic Service	No	OFF_SL_20-745_M-20-745
Colleen	Sipiorski	Colleen.Sipiorski@wecenergygroup.com	Minnesota Energy Resources Corporation	700 North Adams St  Green Bay, WI 54307	Electronic Service	No	OFF_SL_20-745_M-20-745
Anne	Smart	anne.smart@chargepoint.com	ChargePoint, Inc.	254 E Hacienda Ave  Campbell, CA 95008	Electronic Service	No	OFF_SL_20-745_M-20-745
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Stuart	Tommerdahl	stommerdahl@otpc.com	Otter Tail Power Company	215 S Cascade St PO Box 496 Fergus Falls, MN 56537	Electronic Service	No	OFF_SL_20-745_M-20-745

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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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_20-745_M-20-745
Dwight	Wagenius	dwagenius@gmail.com	Minnesota Interfaith Power & Light	4407 E Lake St  Minneapolis, MN 55406	Electronic Service	No	OFF_SL_20-745_M-20-745
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Samantha	Williams	swilliams@nrdc.org	Natural Resources Defense Council	20 N. Wacker Drive Ste 1600 Chicago, IL 60606	Electronic Service	No	OFF_SL_20-745_M-20-745
Justin	Wilson	justin.wilson@chargepoint.com	ChargePoint	240 East Hacienda Ave.  Campbell, CA 95008	Electronic Service	No	OFF_SL_20-745_M-20-745

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Mary	Wolter	mary.wolter@wecenergygroup.com	Minnesota Energy Resources Corporation (HOLDING)	231 West Michigan St  Milwaukee, WI 53203	Electronic Service	No	OFF_SL_20-745_M-20-745
Patrick	Zomer	Patrick.Zomer@lawmoss.com	Moss & Barnett a Professional Association	150 S. 5th Street, #1200  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-745_M-20-745

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Tamie A.	Aberle	tamie.aberle@mdu.com	Great Plains Natural Gas Co.	400 North Fourth Street  Bismarck, ND 585014092	Electronic Service	No	OFF_SL_20-716_M-20-716
Michael	Ahern	ahern.michael@dorsey.com	Dorsey & Whitney, LLP	50 S 6th St Ste 1500  Minneapolis, MN 554021498	Electronic Service	No	OFF_SL_20-716_M-20-716
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_20-716_M-20-716
Alison C	Archer	aarcher@misoenergy.org	MISO	2985 Ames Crossing Rd  Eagan, MN 55121	Electronic Service	No	OFF_SL_20-716_M-20-716
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James	Canaday	james.canaday@ag.state.mn.us	Office of the Attorney General-RUD	Suite 1400 445 Minnesota St. St. Paul, MN 55101	Electronic Service	No	OFF_SL_20-716_M-20-716
Cody	Chilson	cchilson@greatermngas.com	Greater Minnesota Gas, Inc. & Greater MN Transmission, LLC	1900 Cardinal Ln PO Box 798 Faribault, MN 55021	Electronic Service	No	OFF_SL_20-716_M-20-716
Ray	Choquette	rchoquette@agp.com	Ag Processing Inc.	12700 West Dodge Road PO Box 2047 Omaha, NE 68103-2047	Electronic Service	No	OFF_SL_20-716_M-20-716

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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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_20-716_M-20-716
Riley	Conlin	riley.conlin@stoel.com	Stoel Rives LLP	33 S. 6th Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-716_M-20-716
Brooke	Cooper	bcooper@allete.com	Minnesota Power	30 W Superior St  Duluth, MN 558022191	Electronic Service	No	OFF_SL_20-716_M-20-716
Hillary	Creurer	hcreurer@allete.com	Minnesota Power	30 W Superior St  Duluth, MN 55802	Electronic Service	No	OFF_SL_20-716_M-20-716
George	Crocker	gwillc@nawo.org	North American Water Office	PO Box 174  Lake Elmo, MN 55042	Electronic Service	No	OFF_SL_20-716_M-20-716
Bridget	Dockter	Bridget.Dockter@xcelenergy.com		N/A	Electronic Service	No	OFF_SL_20-716_M-20-716
Marie	Doyle	marie.doyle@centerpointenergy.com	CenterPoint Energy	505 Nicollet Mall P O Box 59038 Minneapolis, MN 554590038	Electronic Service	No	OFF_SL_20-716_M-20-716
Michelle	Dreier	mdreier@electricalassociation.com		N/A	Electronic Service	No	OFF_SL_20-716_M-20-716
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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