

January 28, 2026

PUBLIC DOCUMENT

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

RE: **PUBLIC** Comments of the Minnesota Department of Commerce
Docket Nos. E002/M-25-142

Dear Ms. Bergman,

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

In the Matter of Xcel Energy's 2025 Integrated Distribution Plan

The Petition was filed by Xcel Energy (Xcel or the Company) on October 31, 2025.

The Department recommends denial without prejudice and is available to answer any questions the Minnesota Public Utilities Commission may have.

Sincerely,

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

AZ/KB/ar
Attachment



Before the Minnesota Public Utilities Commission

PUBLIC Comments of the Minnesota Department of Commerce

Docket Nos. E002/M-25-142

I. INTRODUCTION

The Northern States Power Company, doing business as Xcel Energy (Xcel) files its first ever Proactive Upgrade Proposal (Proposal).¹ There are two types of proactive planning that Xcel can engage in. The first type is proactive planning at the time of normal asset replacement, which could be called proactive sizing. For example, if a feeder needs to get reconducted due to deterioration, Xcel will proactively size the conductor to meet future forecasted grid needs and all necessary equipment to meet the forecasted load requirement. Regarding this type of proactive planning, Xcel states:

The appropriate design horizon depends on the type of project and system conditions. For example feeder-level projects may only use a 5-10 year horizon, while larger infrastructure additions—such as new substations or transformer additions—are generally designed to meet needs across a 10-30 year horizon.²

The second type of proactive planning relates to the Proposal, and could be called proactive installation. In proactive installation, Xcel proposes projects with a forecasted grid need that is outside of its standard planning window of five years. These proposals forecast grid needs in years six to ten and will incorporate proactive sizing into the specification of the proactive installation project. It is important to highlight that while proactive sizing is standard practice for all Minnesota utilities, proactive installation is not currently practiced by any Minnesota utilities.

Proactive installation originated from Xcel's 2023 Integrated Distribution Plan (IDP). In its *Order Accepting the 2023 Integrated Distribution Plan and Modifying Reporting Requirements*, the Minnesota Public Utilities Commission (Commission) determined that additional record development was needed on proactive distribution grid upgrades and related cost allocation.³ In Order Point 14 of its September 16, 2024 Order, the Commission authorized the Executive Secretary to convene a stakeholder workgroup to develop a framework for Commission approval following a comment process.

¹ *In the Matter of Xcel Energy's 2025 Integrated Distribution Plan*, Proactive Grid Upgrade Proposal, Northern States Power Company, doing business as Xcel Energy, October 31, 2025, Docket No. E-002/M-25-142, (eDockets) [202510-224541-01](#), (hereinafter "Proposal").

² See Information Request (IR) 70 in Attachment A.

³ *In the Matter of Xcel Energy's 2023 Integrated Distribution Plan*, *Order Accepting 2023 Integrated Distribution Plan and Modifying Reporting Requirements*, September 16, 2024, Docket No. E002/M-23-452, (eDockets) [20249-210223-01](#), (hereinafter "September 16, 2024 Order").

Per the Order Establishing Framework for Proactive Distribution Grid Upgrades in Docket No. E002/24-318⁴ and in conjunction with its 2025 IDP,⁵ Xcel files its first Proactive Upgrade Proposal.⁶ The proposed project requests approval for a new feeder in South Minneapolis in response to a forecasted loading need on feeder MDT077. The project is located at the Midtown substation, and has a project cost of \$3.7 million.⁷ As required by the September 2, 2025 Order, Xcel also proposes its tariff, which introduces a proactive cost-share fee.

II. PROCEDURAL BACKGROUND

November 1, 2023	Xcel Energy filed its 2023 Integrated Distribution Plan. ⁸
September 16, 2024	The Commission filed its Order Accepting Xcel's 2023 Integrated Distribution Plan and Modifying Reporting Requirements in Docket No. E002/M-23-452. The Commission delegated authority to the Executive Secretary to establish a stakeholder process to develop a framework on cost allocation and proactive upgrades for Xcel. ⁹
September 27, 2024	The Commission filed its Notice of Workgroup Processes and Soliciting Stakeholders to solicit stakeholder involvement in several workgroups, including the Proactive Upgrades workgroup, and issued notice of the opening of the corresponding dockets. ¹⁰
September 2, 2025	The Commission issued an Order establishing a framework for proactive distribution grid upgrades. ¹¹
October 31, 2025	Xcel files its 2025 Integrated Distribution Plan and its first Proactive Upgrade Proposal, which includes a proposed tariff for the Proactive Cost-Share Fee. ¹²

⁴ *Order Establishing Framework for Proactive Distribution Grid Upgrades*, September 2, 2025, Docket No. E-002/CI-24-318, (eDockets) [20259-222635-01](#), (hereinafter "September 2, 2025 Order").

⁵ *In the Matter of Xcel Energy's 2025 Integrated Distribution Plan*, Integrated Distribution Plan, Northern States Power Company, doing business as Xcel Energy, October 31, 2025, Docket No. E-002/M-25-142, (eDockets) [202510-224538-01](#), (hereinafter "2025 IDP").

⁶ Proposal.

⁷ *Id.*, at 1-2.

⁸ *In the Matter of Xcel Energy's 2023 Integrated Distribution Plan*, Integrated Distribution Plan (filed in three parts), Northern States Power Company, doing business as Xcel Energy, November 1, 2023, Docket No. E002/M-23-452, (eDockets) [202311-200132-09](#) (hereinafter "2023 IDP").

⁹ September 16, 2024 Order.

¹⁰ *In the Matter of Xcel Energy's 2023 Integrated Distribution Plan*, Notice of Workgroup Processes and Soliciting Stakeholders, Minnesota Public Utilities Commission, September 27, 2024, Docket No. E-002/M-23-452, (eDockets) [20249-210530-01](#), at 2.

¹¹ September 2, 2025 Order.

¹² Proposal.

November 13, 2025 The Commission issues Notice of comment period for the Proposal.¹³

Topic(s) open for comment:

- Should the Commission approve, modify or reject Xcel Energy's Proactive Upgrade Proposal? In your response, please identify whether the Proposal aligns with the Proactive Distribution Grid Framework.
- What type and amount of cost cap should the Commission establish for total Proactive Distribution Upgrade costs?
- Should the Commission approve Xcel Energy's proposed tariff pages?
- Are there any other issues or concerns related to this matter?

III. DEPARTMENT ANALYSIS

A. APPROVAL OF XCEL'S PROACTIVE UPGRADE PROPOSAL

The Department responds to the following notice topic:

Should the Commission approve, modify or reject Xcel Energy's Proactive Upgrade Proposal? In your response, please identify whether the Proposal aligns with the Proactive Distribution Grid Framework.

In this section, the Minnesota Department of Commerce (Department) addresses the Proposal's alignment with the Commission's September 2, 2025 Order, and then addresses the merits of the Proposal with a focus on the forecasted need for the Proposal.

As a planning construct, proactive installation is inherently risky. It replaces known or expected system costs with speculative and uncertain future costs. The Department supports the maximum utilization of all existing system assets whenever possible. All other considerations being equal, each year that an asset remains on a utility's system is an additional year that new costs do not have to be incurred, which minimizes the effect of new infrastructure on rates. If a utility proactively replaces an asset before the end of its expected useful life, then that proactive project will increase rates. Therefore, accurate timing of the need for these projects is essential.

While the Department supported approval of the Proactive Distribution Grid Framework in Docket No. E-002/CI-24-318, the Department's approval represents only the approval of the framework. In practice, the Department views only a small subset of potential proactive projects as legitimate candidates for proactive planning due to the risks on rates. All other factors being equal, a project that has any percentage of paying customers at the time of installation is a safer investment compared to a project that has none. In this regard, any project that could be incorporated into the Distribution System Reactive Upgrades Process (DSRUP) is preferable to the same project presented in the

¹³ Notice of Comment Period, November 13, 2025, Docket No. E-002/M-25-142, (eDockets) [202511-224924-01](#) (hereinafter "Notice").

Proactive Distribution Grid Framework.¹⁴ Any other Commission-approved process or standard utility process that includes cost recovery at the time of construction is preferable to the Proactive Distribution Grid Framework. The main value of proactive installation is when a five-year installation horizon may be problematic for utilities. Such projects involve greenfield projects with permitting requirements or equipment that requires long lead times. The best use case for proactive installation would be load growth in exurban areas, where a utility could proactively install a substation and transmission lines while land is cheap and accessible. In order to minimize the cost to ratepayers, the best time to proactively plan the grid is during normal asset replacement processes with proactive sizing. However, the Department does not rule out other use cases, including potential applications of solar hosting capacity not covered by the DSRUP. The Department intends to review each proactive project on a case-by-case basis to determine if they are in the public interest.

A.1. Alignment With the Proactive Distribution Grid Framework

Upon review, the Department finds that Xcel's Proposal aligns with the Proactive Distribution Grid Framework as established in the Commission's September 2, 2025 Order. An overview of the Proactive Distribution Grid Framework requirements as filed by Xcel can be found in Attachment B. The Department notes that Xcel does not respond to Requirement I.5, regarding the establishment of a cost cap, which is addressed in Section B.

A.2. Sources of Forecast Error

A proactive upgrade proposal is only as useful as the forecast underlying the forecasted grid needs. The Department believes the Proactive Distribution Upgrade Framework introduces a new level of uncertainty to decision making that the Commission has not yet considered. The uncertainty results from the two forecasts used in LoadSEER modeling. The first forecast is the traditional forecast that is used for system-wide capacity that is used in rate cases, integrated resource plans, and other proceedings. This forecast is used as an input to LoadSEER. LoadSEER then takes the system-wide forecast and uses other data—primarily historical load data at a feeder or substation—and creates the second forecast of feeder and substation load.

There are two important examples to consider regarding forecasted load. The first example is when the system-wide forecast is accurate. In this example, forecasted system-wide energy needs follow the forecast almost perfectly. If the Proactive Distribution Upgrade Framework functions as intended, then every forecasted grid need will materialize, and all anticipated loads and generation will occur exactly where LoadSEER predicts they will occur. This situation is highly unlikely to occur, because actual loads will materialize in patterns that do not match those predicted by a statistical model, particularly at high level of geographic granularity. Instead, some feeders and substations will have more load than predicted, and some feeders and substations will have less. If a utility selects only the sites that have load that is greater than or equal to the forecasted grid need, then every proactive project will again

¹⁴ See Attachment A for the draft proposal. *In the Matter of Establishing Tariffs for Distribution System Cost Sharing for Interconnection in Constrained Areas*, Notice of Comment Period, Minnesota Public Utilities Commission, September 26, 2025, Docket No. E002, E015, E017/CI-24-288, (eDockets) [20259-223328-01](#).

materialize. This situation is also highly unlikely to occur in every instance. Instead, if actual loads deviate from the hundreds of localized LoadSEER predictions based on a normal distribution, then each upgrade should have only a fifty percent chance of its grid need being met on or before the forecasted need year, and the remaining fifty percent may materialize in forecast years 11 to 20, or may never materialize.

The second example is similar to the first, except that the system-wide forecasted load is inaccurate. If the input to LoadSEER is inaccurate, then the LoadSEER forecast will have a systematic bias in addition to the LoadSEER forecast variability as described in the previous example. If the system-wide forecast is too high, then the risk that LoadSEER will forecast a grid need before the actual grid need year increases above the fifty percent chance of the local forecasted grid year being too soon. The opposite is true if the system-wide forecast is too low.

A.3. Forecast Accuracy

The Department analyzes relevant data discussed in the previous section to describe the forecast accuracy risks of proactive planning. Table 1 displays ten years of forecasted energy sales for Xcel's Minnesota territory, which shows red when a forecasted year's energy sales are higher than the actual sales, and blue when the forecasted year's energy sales are lower than the actual sales. The bolded cells represent forecasts of grid needs that are six to ten years in the future, which corresponds with the Proactive Distribution Upgrade Framework planning horizon. The table shows that every year in the Proactive Distribution Upgrade Framework planning horizon is higher than the actual sales. The average forecasted energy sales deviation for forecast year six, seven, eight, nine, and ten is 5.2%, 5.7%, 7.9%, 10.1%, and 12.6%,¹⁵ respectively. Based on this analysis, it can be expected that Xcel's current forecast estimates could be biased to a similar extent.

Table 1: Comparison of Xcel Minnesota Energy Sales Forecasts to Actual Energy Sales

	Forecast Vintage									
	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023
2015	1.4%									
2016	2.1%	1.2%								
2017	3.9%	3.1%	1.5%							
2018	1.5%	0.3%	-1.4%	-3.1%						
2019	6.2%	5.2%	3.6%	0.0%	0.6%					
2020	10.3%	9.5%	7.4%	3.6%	4.4%	1.6%				
2021	7.5%	6.8%	4.8%	0.5%	1.1%	-2.1%	-3.1%			
2022	7.4%	6.5%	4.1%	-0.2%	0.4%	-3.1%	-3.7%	-2.3%		
2023	8.6%	7.6%	5.1%	0.4%	0.9%	-3.0%	-3.8%	-1.5%	-1.2%	
2024	12.6%	11.5%	8.7%	3.8%	4.4%	-0.3%	-1.0%	2.1%	1.5%	1.9%

Source: Docket No. E999/M-YR-11

¹⁵ Note that year 10 only includes the 2014 forecast.

In its 2025 IDP, Xcel provides a high-level analysis of its LoadSEER forecast accuracy. The analysis compares Xcel’s 2023 IDP Low, Medium, and High forecasts to actuals in 2023 and 2024. Xcel’s 2023 IDP describes the IDP Low, Medium, and High forecasts as follows:

To align with the intent of IDP Requirement 3.C.1, the “IDP Low” scenario represents what is considered the base case, or expected adoption forecast for each DER technology forecasted. The “IDP Med” and “IDP High” scenarios then represent faster-than-expected adoption scenarios for each DER technology, adding an extra 10 percent and an extra 25 percent of DER adoption over the base case, respectively.¹⁶

Table 2 presents Xcel’s analysis of its 2023 forecast accuracy for the IDP Low, Medium, and High forecasts. Based on Xcel’s analysis, the 2023 IDP Low forecast was 6.1% higher than the actual in 2023 and 10.1% higher than the actual in 2024. These deviations are contrasted with Xcel’s system-wide forecast accuracy, which averaged -0.2% and 0.3% deviations from actuals in the first and second forecasted years, respectively. The highest deviation observed in the system-wide forecasts is 3.1% for the first year and 4.4% for the second year.

Table 2: LoadSEER Forecast Accuracy

Table 1-11
Comparison of 2023 IDP Forecast to Actuals

Aggregate Distribution Feeder Peak Load- MN (MW)		
	2023	2024
Historic Actuals	8,205	7,996
2023 IDP Low Native	8,702	8,806
2023 IDP Med Native	8,708	8,819
2023 IDP High Native	8,715	8,837

Source: Xcel 2025 IDP¹⁷

Additionally, the Department requested a subset of forecast accuracy data for capacity projects over \$5 million listed in Attachments D and E of Xcel’s 2025 IDP with the Department’s Information Request (IR) 74.¹⁸ These projects represent over half of Xcel’s estimated capacity budget presented in the 2025 IDP – Attachment E. While Xcel does not have a complete dataset of actual peak load for all 30 projects over \$5 million, each project has at least one actual load measurement to compare to the 2023 IDP Low forecast years of 2023 and 2024. Figures 1 and 2 display the number of circuits and the magnitude of the deviation from the actual load for years 2023 and 2024, respectively. A positive number means

¹⁶ 2023 IDP - Attachment A1 at 50.

¹⁷ 2025 IDP - Chapter 1 at 77.

¹⁸ See Attachment A. Note that IR 74 – Attachment A contains trade secret data, but the IR response erroneously does not indicate that Attachment A contains trade secret data.

that the forecast is higher than the actual, and a negative number means the forecast is lower than the actual. Figures 1 and 2 indicate that **[TRADE SECRET DATA HAS BEEN EXCISED]**.

Taken together, these results suggest that Xcel's proactive planning horizon forecast assumptions will most likely over-estimate the capacity needs in forecast years 6-10. While the average Xcel system-wide forecast deviation is essentially non-existent in forecast years 1 and 2, the 2023 forecast deviation presented in Table 1 shows a 1.9% higher deviation compared to the actual. While this deviation is expected to propagate into the LoadSEER forecast, it does not explain the majority of the deviation in the LoadSEER forecast, which suggests that LoadSEER forecast is the major source of deviation. This variation is expected to be enhanced by the system-wide forecast deviations presented in Table 1 in forecast years 6-10, with average deviations ranging from 5.2% - 12.6%. In addition, the forecast accuracy of the 2023 IDP Low forecast used in LoadSEER decreased significantly between 2023 and 2024, which may suggest even greater deviations from actual load in forecast years 6-10. The Department expects the LoadSEER forecast inaccuracy to increase at a higher rate compared to the Xcel system-wide forecast because of the hundreds of separate forecasts made by LoadSEER compared to only one system-wide forecast that can smooth out local system variability. However, at this time, there is not sufficient data to draw a firm conclusion.

Finally, Xcel's LoadSEER forecast does not account for the recission of the Inflation Reduction Act (IRA) tax credits.¹⁹ Xcel confirms that the LoadSEER forecast includes the full IRA tax credits in IR 25.²⁰ It is difficult to predict the net effect of all tax credit recissions; however, the Department can draw some general conclusions. First, Xcel's native load forecast with planned net loading (PNL) mostly excludes solar generation for planning purposes, and therefore less solar will not significantly increase the peak load forecast. In addition, solar generation may not be coincident with peak load, such that a 9 PM peak would be unaffected, regardless of the amount of installed solar capacity or how much credit the capacity is granted for planning purposes.²¹ Therefore, the Department expects that the recission of solar tax credits will not significantly impact most peak load forecasts. Second, the recission of electric vehicle (EV) tax credits will have a significant downward effect on peak load forecasts. Department Figure 3 demonstrates that the majority of EV charging is unmanaged and will stay that way throughout the proactive planning horizon, which means that charging could be coincident with peak load and add to the forecasted peak load. Therefore, with fewer EVs on the road than previously forecasted, the Department expects the peak load forecasts to decrease.

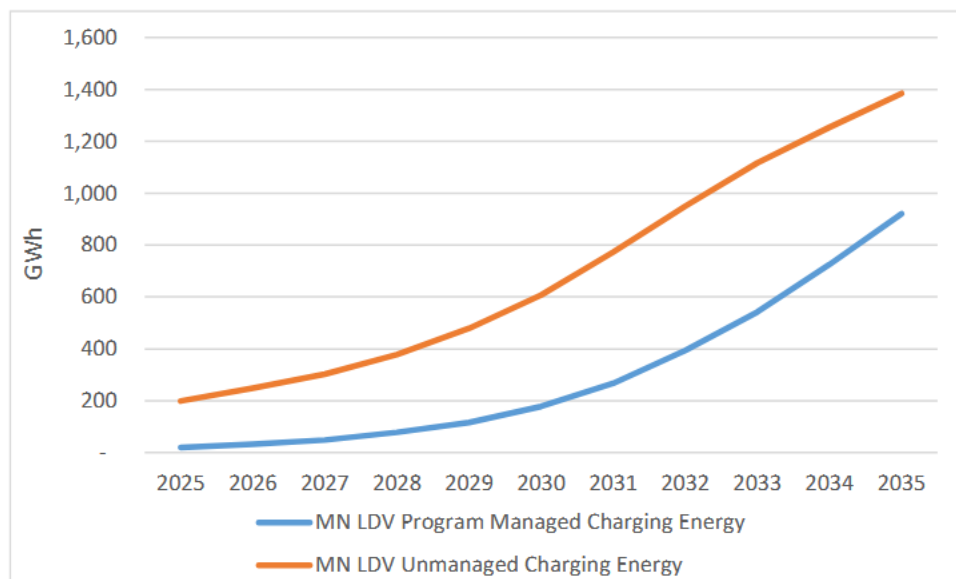
¹⁹ 2025 Federal Budget Reconciliation Bill, H.R. 1 (Public Law 119-21).

²⁰ See Attachment A.

²¹ See 2025 IDP – Chapter 1 at 84-90.

Figure 1: Xcel Modeled EV Managed VS Unmanaged Charging

Figure 1-15
LDV Managed and Unmanaged Home EV Charging Energy Consumption in Minnesota



Source: 2025 IDP - Chapter 1 at 50

There are two additional tax credits to consider. First, electrification of heat and water is expected to decrease. However, as Xcel explains, electrification of heating not expected to significantly affect peak load forecasts in the near-term, because the majority of feeders are summer peaking:

Another interesting observation is that approximately between the mid-2040s and the early 2050s, a little over half of the system switches to a nighttime winter peak rather than an afternoon summer peak. This is again primarily driven by the managed EV charging forecast as well as beneficial electrification.²²

Regarding the MDT077 project, Xcel anticipates that the feeder will shift to winter peaking in 2031, which makes electrification adoption relevant.²³ Increased adoption of heat pumps could either add or reduce load depending on if the replaced fuel source is electric resistance or fossil fuel-based. On net, Xcel appears to expect electrification to increase load.²⁴ Therefore, a decrease in electrification could reduce the winter peak load growth and could delay a winter peaking need until after the forecasted 2034 need. Finally, energy efficiency incentives are also reduced with the recission of IRA tax credits.

²² 2025 IDP – Chapter 1 at 74.

²³ Proposal at 6.

²⁴ 2025 IDP – Chapter 6 at 33.

With less energy efficiency, peak load is expected to rise, however ECO incentives are still active, and will continue to drive energy efficiency improvements.

On net, the Department expects that reduced EV and electrification adoption will reduce peak load forecasts more than reduced energy efficiency will increase peak load forecasts. The IDP High scenario used by Xcel also assumes higher levels of transportation and heating electrification adoption that will be more significantly affected by the recission of tax credits compared to Xcel's IDP Low forecast. Taken together, the Department expects that peak load forecasts will be on net revised down compared to the forecast Xcel uses for its Proposal.

A.4. Department Recommendations

The Department highlights three sources of forecast error, which all suggest that Xcel's peak load forecast in its Proposal is too high. These sources of error include error in the system-wide forecast, the LoadSEER forecast, and in the assumption of IRA tax credit availability. In addition, the expected need does not occur until forecast year 9, which means that a revised forecast could reveal a project need outside of the Proactive Distribution Upgrade Framework planning horizon. **[TRADE SECRET DATA HAS BEEN EXCISED]**.

In IR 23, the Department asks Xcel to explain any negative consequences that would result if the MDT077 project were to be delayed until the next IDP. Xcel provides the following reply:

Delaying the MDT077 project until the next IDP will not result in any negative consequences because of the inherent characteristics of a proactive upgrade. However, there is a time value of money cost to delaying projects such as inflationary pressures and increased material and labor costs. The anticipated project start date is 2028 to provide additional time for forecast validation and to appropriately prioritize the proactive upgrade against other necessary investments in the five-year budget.²⁵

Based on the analysis provided in this section, the Department does not expect the MDT077 project need to occur in the Proactive Distribution Upgrade Framework planning horizon. While Xcel raises inflationary concerns regarding delay, the Department views these concerns as less significant compared to the need for the project itself.

The Department recommends the Commission deny the MDT077 project without prejudice.

There is still a value to tracking the MDT077 project need over time. If the need does not materialize in the 2027 IDP, it will be valuable for stakeholders to know whether or not the current forecast is accurate.

²⁵ See IR 23 in Attachment A.

The Department recommends Xcel file the MDT077 project forecast and upgrade need year in its next IDP.

Finally, the LoadSEER tool is very new and does not have a proven track record. To the Department's knowledge, Xcel presented its first formal LoadSEER forecast in its 2023 IDP, which provides only two years of forecasts for which to measure forecast accuracy. The evidence thus far suggests that LoadSEER forecasts are too high, which can trigger project needs that do not materialize. In addition, Xcel now uses LoadSEER as part of its standard capacity planning process.²⁶ Therefore, it is important to track long-term LoadSEER forecast accuracy both for future proactive upgrade proposals, as well as for general capacity planning. The need for forecast accuracy analysis will not dissipate, and therefore the Department seeks the creation of a new filing requirement in the IDP. The Department bases its recommendation on the Commission's Order Point 5 of the Commission's 2024 IDP Order, which states:

Xcel shall provide a comparison of the forecast provided in the IDP to actuals in its next IDP.²⁷

The Department recommends the Commission create a new IDP filing requirement to provide a comparison of forecast accuracy for each vintage and scenario (IDP Low, Medium, High) in Xcel's LoadSEER forecasts compared to actuals.

B. COST CAP

The Department responds to the following notice topic:

What type and amount of cost cap should the Commission establish for total Proactive Distribution Upgrade costs?

The Proactive Distribution Upgrade Framework approved in the Commission's September 2, 2025 Order requires the Commission to set a cost cap for proactive upgrades. Section I.5 of the Proactive Distribution Upgrade Framework states:

Total Proactive Distribution Upgrade costs recoverable from ratepayers shall be capped in some manner, such as a percentage of the total capacity-related five-year budget in the IDP, or a specified dollar cap on Proactive Distribution Upgrades. The cost cap shall be determined as part of the Commission's first Proactive Distribution Upgrade Proposal decision.²⁸

Xcel does not discuss a cost cap in its Proposal. The Company makes a relatively small budget request of \$3.7 million, which is 0.2 percent of Xcel's 2025 and 2026 forecasted capital expenditure budget.²⁹

²⁶ See Figure 1-3. 2025 IDP – Chapter 1 at 5.

²⁷ September 16, 2024 Order at 23.

²⁸ September 2, 2025 Order – Proactive Distribution Upgrade Framework at 9.

²⁹ See 2025 IDP - Attachment L.

The cost cap should also be considered in the context of project-specific upgrade costs. For example, Xcel presents its Table 1 in the Proposal to outline the range of costs by upgrade type, which is shown below. A cost cap of \$10 million may limit potential projects to feeders and substation upgrades, whereas a cost cap of \$50 million will cover all potential upgrade scenarios. Any larger cost cap larger than \$50 million would allow for multiple projects to be approved.

Department Table 3: Xcel Summary of Capacity Upgrade Costs

Table 1
Upgrade Costs

Upgrade Type	Cost Estimate
Feeder upgrades	\$100k - \$10 million
Feeder extensions	\$100k - \$10 million
New feeder circuits	\$1 million - \$15 million
Substation upgrades	\$500k - \$5 million
Expanded substations	\$4 million - \$20 million
New substations	\$5 million - \$50 million

Source: Proposal at 3.

The cost cap should also be considered in the context of time. By definition, proactive upgrades are not anticipated to be used and useful until six to ten years from the forecast year. Therefore, it may not be known whether a proactive upgrade is used and useful until six to ten years after an upgrade is approved. In the meantime, the Commission may authorize multiple proactive upgrade proposals without knowledge of whether the forecasted grid needs materialized or not.

Based on the preliminary results presented in Section A, the Department urges caution regarding a cost cap. While the forecast uncertainty of Xcel's system-wide forecast is known, the forecast uncertainty of LoadSEER remains unknown, but initial results are concerning. A high cost cap could authorize tens of millions of dollars worth of projects that in ten years may prove to have not been necessary. The Department does not seek to impede the proactive planning process, rather it seeks strict cost controls until such time as LoadSEER forecasts are proven to be accurate and reliable in the proactive planning horizon. Based on Xcel's estimated upgrade costs, it is reasonable to allow several smaller projects similar to the MDT077 project to be constructed, or one or more larger projects, in order to pilot the proactive planning process until the LoadSEER forecast accuracy can be confirmed.

The Department recommends the Commission order a Proactive Distribution Upgrade Framework cost cap of \$15 million.

C. *PROPOSED TARIFF*

The Department responds to the following notice topic:

Should the Commission approve Xcel Energy's proposed tariff pages?

The Department finds that Xcel's tariff sheets are reasonable, and should be approved with one modification. The tariff pages provide a list of projects that require a cost share fee for eligible customers, but the tariff sheet does not provide a list of when these cost share fees become active. For example, if the MDT077 project is approved in this proceeding, the project would not be added to the tariff sheet until 2034, provided that the forecasted need materializes in that year. For tracking purposes, it would be beneficial to list each Commission-approved proactive project and the threshold that delineates when customers transition from Xcel's normal cost recovery to the Proactive Distribution Upgrade Framework cost recovery.

The Department recommends the Commission approve Xcel's tariff sheets with a modification to add each Commission approved proactive upgrade and its Proactive Distribution Upgrade Framework triggering threshold for cost recovery.

D. *OTHER ISSUES*

The Department responds to the following notice topic:

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

The Department has no comments regarding this notice topic.

IV. **DEPARTMENT RECOMMENDATIONS**

Based on analysis of Xcel's Proactive Upgrade Proposal and the information in the record, the Department recommends denial of the Proposal without prejudice. The Department has prepared additional recommendations, which are provided below. The recommendations correspond to the subheadings of Section III above.

A. *APPROVAL OF XCEL'S PROACTIVE UPGRADE PROPOSAL*

- A.1. The Department recommends the Commission deny the MDT077 project without prejudice.
- A.2. The Department recommends Xcel file the MDT077 project forecast and upgrade need year in its next IDP.
- A.3. The Department recommends the Commission create a new IDP filing requirement to provide a comparison of forecast accuracy for each vintage and scenario (IDP Low, Medium, High) in Xcel's LoadSEER forecasts compared to actuals.

B. COST CAP

- B.2. The Department recommends the Commission order a Proactive Distribution Upgrade Framework cost cap of \$15 million.

C. PROPOSED TARIFF

- B.2. The Department recommends the Commission approve Xcel's tariff sheets with a modification to add each Commission approved proactive upgrade and its Proactive Distribution Upgrade Framework triggering threshold for cost recovery.

D. OTHER ISSUES

- None

Attachments

- ☐ **Not-Public Document – Not For Public Disclosure**
☐ **Public Document – Not-Public Data Has Been Excised**
☒ **Public Document**

Xcel Energy	Information Request No.	23
Docket No.:	E002/M-25-142	
Response To:	Minnesota Department of Commerce	
Requestor:	Ari Zwick	
Date Received:	November 25, 2025	

Question:

Topic: Delay of Upgrade

Reference(s): Proactive Upgrade Proposal

Please explain any negative consequences that would result if the MDT077 project were to be delayed until the next IDP.

Response:

Delaying the MDT077 project until the next IDP will not result in any negative consequences because of the inherent characteristics of a proactive upgrade.

However, there is a time value of money cost to delaying projects such as inflationary pressures and increased material and labor costs. The anticipated project start date is 2028 to provide additional time for forecast validation and to appropriately prioritize the proactive upgrade against other necessary investments in the five-year budget.

Preparer:	Joe Verbout
Title:	Manager, System Planning and Strategy
Department:	NSP Distribution Planning
Telephone:	612-399-5359
Date:	December 11, 2025

- | | | |
|----------------|----------------------------------|----|
| Xcel Energy | Information Request No. | 25 |
| Docket No.: | E002/M-25-142 | |
| Response To: | Minnesota Department of Commerce | |
| Requestor: | Ari Zwick | |
| Date Received: | November 25, 2025 | |

Reference(s): Proactive Upgrade Proposal

In the IDP, we note that the Base Case scenario was not directly affected by the rescission of IRA tax credits for EV and solar forecasts. The IDP High scenario builds on the Base Case to evaluate the impact of high DER and electrification penetration on the system. Therefore, the IDP High scenario forecast also does not explicitly account for the rescission of IRA tax credits.

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- ☐ **Not-Public Document – Not For Public Disclosure**
☐ **Public Document – Not-Public Data Has Been Excised**
☒ **Public Document**

Xcel Energy	Information Request No.	70
Docket No.:	E002/M-25-142	
Response To:	Minnesota Department of Commerce	
Requestor:	Ari Zwick, Bhavin Pradhan, Adway De, Krystal Binversie	
Date Received:	December 26, 2025	

Question:

Topic: Planning Load Limit – Sizing for Future Needs

Reference(s): IDP Chapter 1, Page 19

Xcel states:

The planned loading limits serve as a guiding principle that enables consistent evaluation across the system and provides a scalable abstraction for complex analyses—such as in long-term studies or in dense metro areas with network feeders. In practice, we regularly load feeders beyond the planned loading limit with analysis from engineering determining where risks may be present and mitigations are necessary. Additionally, when designing a mitigation, we seek to achieve the planned loading limits to ensure the solution meets the design needs for the life of the solution. These thresholds are flagged in our planning tools and processes to ensure that higher loading levels are carefully assessed and mitigated when doing so is determined to be prudent.

Based on the above statement, if the design need indicates a design capacity that is 50 percent higher in year 30 than in year 5, will Xcel design the mitigation to the year 5 capacity need, the year 30 capacity need, or something else?

Response:

There is no single rule for sizing mitigations to a specific forecast year. The appropriate design horizon depends on the type of project and system conditions. For example feeder-level projects may only use a 5-10 year horizon, while larger infrastructure additions—such as new substations or transformer additions—are generally designed to meet needs across a 10-30 year horizon.

In all cases, the goal is to design solutions that meet future needs, avoid premature rebuilds, and serve as building blocks for long-term plans. Customer load patterns, new development, and DER adoption can change from year to year, which is why planning is revisited annually. As a result, while a mitigation may align with today's forecast, that forecast may evolve, and design decisions must balance long term needs with prudent investment.

The Company does its best to avoid rebuilding the system by taking into account future needs. The Company also points out the need to remember that the distribution system is very dynamic. New customers come in, customers move their businesses, residential customers change their habits – therefore, while our plan may meet the forecast today, the forecast could change the following year – which is why we do this process annually.

Preparer: Meghan Tisdell
Title: Prin. Engineer
Department: NSP Distribution Planning
Telephone: 763-493-1850
Date: January 16, 2026

- ☐ **Not-Public Document – Not For Public Disclosure**
☐ **Public Document – Not-Public Data Has Been Excised**
☒ **Public Document**

Xcel Energy	Information Request No.	74
Docket No.:	E002/M-25-142	
Response To:	Minnesota Department of Commerce	
Requestor:	Ari Zwick, Bhavin Pradhan, Adway De, Krystal Binversie	
Date Received:	December 26, 2025	

Question:

Topic: LoadSEER Forecast Accuracy of Planned Projects

Reference(s): IDP Attachment E

For each project in Attachment E with “Planned Spending in 5 Year Budget” of \$5 million or greater, please present the Actual Peak Load and LoadSEER Predicted Peak Load for the years 2021-2024.

Please provide the requested data in a Microsoft Excel executable format with all links and formulae intact. If any of these links target an outside file, please provide all such additional files.

Response:

Historic peak loads are not tracked for all assets. As part of Order Point 5 of the Commission’s 2024 IDP Order, we completed a significant one-time data cleaning effort to compare actuals to forecasts, but the effort focused on feeder data and did not include transformer banks. Therefore, we do not have complete asset-level historical data to fully respond to this request.

Attachment A provides the Actual Peak Load and LoadSEER Predicted Peak Load for projects with “Planned Spending in 5 Year Budget” of \$5 million or greater. Because the request seeks predicted values comparable to historical values, the forecast must come from a scenario vintage older than the historical years being compared. The 2025 IDP scenarios contain forecasts only for 2026 and beyond, and therefore cannot be used for 2021–2024 comparisons. As the request did not specify a forecast scenario, we provide the 2023 IDP Low scenario for this purpose. Please note that, because transformers were not included in the 2025 data cleaning effort described above, historical peak information is incomplete for some assets.

Attachment A is provided as a Microsoft Excel workbook with all links and formulae intact.

Preparer:	Joe Verbout
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Department:	NSP Distribution Planning
Telephone:	612-399-5359
Date:	January 16, 2026

[illegible]

Attachment B – Compliance Table

Xcel Energy’s Proactive Distribution Upgrade Proposal

Requirement		Page Number
D. Baseline Information		
D.1	The types of upgrade projects and programs that fit within the framework and are currently considered when developing proposals. This may change over time based on utility capability.	2
D.2	Issues the potential project or program solves.	2
D.3	General range of cost for each type of upgrade.	3
D.4	An outline of future upgrade options, such as storage, and on what timeline they may be available.	3
D.5	A summary of upgrades that were previously approved but have since been accelerated, delayed, or abandoned due to a change in need since the last filing.	NA
E. Forecast		
E.1	Xcel Energy shall provide a base case forecast, as well as sensitivities that include higher and lower adoption of DERs and customer loads than expected in the base case. Xcel Energy shall recommend which forecast should be adopted and explain why it thinks that forecast should be the case toward which to plan and why.	3-5
E.2	Where possible, the following load and DER components shall be differentiated in the forecast data provided: distributed solar PV, CSGs, distributed energy storage, energy efficiency, demand response, electric vehicles, and electrification of space, water, and process heating	5
E.3	For each of the DER components above, Xcel Energy shall provide a discussion of each essential assumption made in preparing the forecast, including assumptions regarding customer adoption rates, cost trends, and relevant policy drivers. Xcel Energy should include any sensitivity analyses used to test these assumptions.	4-5
E.4	In addition to the existing IDP load and DER forecast requirements, Xcel Energy shall submit its forecast results for generation and peak loads at the feeder/substation level for all locations associated with proposed Proactive Distribution Upgrades.	6-7
E.5	All proposed Proactive Distribution Upgrades shall be based on a forecasted need identified in the forecast between years five and ten, unless the anticipated lead time for an upgrade project exceeds ten years.	7
E.6	The forecast shall include an assessment of existing available hosting capacity for generation and load to the same extent as is shared in Xcel Energy’s Hosting Capacity Analysis results.	7-8
F. Potential Sites for Proactive Distribution Upgrades		

F.1	The criteria used to identify potential sites for Proactive Distribution Upgrades, including a discussion of feedback received from stakeholders under Section C.10.	9
F.2	A list of sites that Xcel Energy may consider for future Proactive Distribution Upgrades.	9
F.3	A list of proposed Proactive Distribution Upgrades, including identifying any changes to upgrade locations since the last submission.	9
F.4	A narrative description or analysis of the impact of the proposed Proactive Distribution Upgrades on Environmental Justice Areas, as defined by Minn. Stat. §216B.1691, Subd. 1 (e).	9-11
F.5	The total capital cost of all proposed Proactive Distribution Upgrades and the projected total lifetime revenue requirements.	11
F.6	For each site where Xcel Energy is proposing a Proactive Distribution Upgrade project, Xcel Energy must provide:	
F.6.a	Expected type of upgrade.	11
F.6.b	Narrative description for why the proposed upgrade or group of upgrades has been selected for the Proactive Distribution Upgrade process.	11-12
F.6.c	Estimated upgrade cost and duration of construction.	12
F.6.d	Increase in load and generation capacity expected to result from the proposed upgrade.	12
F.6.e	Forecasted period before another upgrade is anticipated to be needed at the same site.	12
F.6.f	Magnitude of forecasted growth (load or generation) and capacity gap driving the need for the proposed upgrade.	12-13
F.6.g	Classes or characteristics of load or generation driving the need for the proposed upgrade.	13
F.6.h	A quantitative or qualitative level of confidence of the forecasted need, and/or sensitivity of the forecasted need to deviations from the forecast, driving the need for the specific project. This may include any information gathered from communities, developers, customers (for example if large fleet owners, or other industrial/commercial building customers) and others that informed selection of the site.	13
F.6.i	Identification of any known additional benefits resulting from the upgrade.	13-14
F.6.j	Identification of planned capital investment or maintenance work to be coordinated with the proposed Proactive Distribution Upgrade (where appropriate).	14
F.7	For sites that Xcel Energy analyzed but ultimately decided not to upgrade, the reasons Xcel Energy decided not to propose a Proactive Distribution Upgrade at that site.	14
F.8	For upgrades that are proposed as part of a longer-term plan, Xcel Energy shall provide an assessment of whether they are expandable and whether there would be any potential benefits or costs from doing repeated work in the same area.	14
G. Proactive Distribution Upgrade Proposal Evaluation Criteria		
G.1	The total capital cost of the proposed upgrade and its projected total lifetime revenue requirement.	14-15

G.2	The overall capacity gained for both load and generation.	15
G.3	The cost per unit of capacity gained.	15
G.4	The lead time for the upgrade.	15
G.5	The risk of deferring the upgrade, or using the existing distribution planning process, including quantifying the potential energization delays (in years) and number of customers impacted by delays.	15-16
G.6	Whether Xcel Energy performed a non-wires alternative (NWA) for the project, and if so, a citation to the results of the analysis in its IDP. If Xcel Energy did not perform an NWA, provide a discussion of alternative measures, if any, that could be taken to mitigate the risk(s) the upgrade is intended to address, including energy-conservation, load-management measures and/or flexible interconnection.	16
G.7	The degree of certainty, qualitative or quantitative, of the forecast components driving the forecasted need at that location, and any additional certainty in the magnitude/scale of investment provided by direct customer engagement.	16-17
G.8	The remaining estimated useful life of the assets proposed to be replaced.	17
G.9	The estimated number of years beyond the timing of the upgrade that the project would meet the forecasted capacity needs at that location.	17
G.10	Narrative description or analysis of the impact of the proposed Proactive Distribution Upgrade projects, including impacts on Environmental Justice Areas, as defined by Minn. Stat. §216B.1691, Subd. 1 I.	17-18
G.11	The benefits additional to increased hosting capacity realized from the upgrade, if any, to reliability, resilience, safety, and asset health, and the value of those benefits, where known.	18
G.12	How any additional planned work would be coordinated with the proposed Proactive Distribution Upgrade (where appropriate).	18
G.13	The extent to which the upgrade would facilitate progress toward greenhouse gas emission reduction targets.	18
G.14	Which desired outcomes of the proactive planning process would be facilitated by the proposed upgrade.	18-20
G.15	Feasibility of the projected Proactive Distribution Upgrade project timeline including any foreseeable risks to the timeline.	20
I. Proactive Distribution Upgrade Proposal Evaluation Criteria		
I.1	Xcel Energy may request deferred-accounting treatment for approved Proactive Distribution Upgrade investments. The Commission shall grant, deny, or modify the request with the Proactive Distribution Upgrade Proposal decision.	20
I.2	Each approved Proactive Distribution Upgrade shall have a Proactive Cost-Share Window that starts the year that the Proactive Distribution Upgrade project is placed in-service. The duration of the Proactive Cost-Share Window shall be until 10 years after the anticipated need date for the Proactive Distribution Upgrade at the time of approval.	20-21
I.3	Interconnecting customers that apply to interconnect on or before the Proactive Cost-Share Window end date are Proactive Cost-Share Customers unless otherwise exempted under Section J. For generation interconnections, the date of applying to interconnect shall be the Deemed Complete date under the Minnesota Distributed Energy Resource Interconnection Process (MN DIP).	21

I.4	During the Proactive Cost-Share Window, Proactive Cost-Share Fees from Proactive Cost-Share Customers act as an offset to the revenue requirements of all Proactive Distribution Upgrades.	21
I.5	Total Proactive Distribution Upgrade costs recoverable from ratepayers shall be capped in some manner, such as a percentage of the total capacity-related five-year budget in the IDP, or a specified dollar cap on Proactive Distribution Upgrades. The cost cap shall be determined as part of the Commission's first Proactive Distribution Upgrade Proposal decision.	Not Responsive
I.6	Capital expenditures that have been offset by Proactive Cost-Share Fees do not count against the cap.	21
I.7	The Commission's Proactive Distribution Upgrade Proposal decision creates a rebuttable presumption, in a cost-recovery proceeding, that upgrades completed consistent with the decision are prudent.	NA
I.8	An interested person may submit substantial evidence to rebut the Proactive Upgrade Proposal findings and conclusions in a cost recovery proceeding. Substantial evidence does not include a change in forecasted need that occurs after the utility has initiated construction of a proactive upgrade.	NA
J. Cost Allocation		
J.1	If a change is made to distribution planning or other utility standards that impacts the amount of available hosting capacity after a Proactive Distribution Upgrade project has been completed, there shall be no resulting retroactive change in cost sharing responsibility. If a change is made to distribution planning or other utility standards that impacts the amount of available hosting capacity after a Proactive Distribution Upgrade project has been completed, there shall be no resulting retroactive change in cost sharing responsibility.	NA
J.2	A \$/kWac fee shall be charged to any Proactive Cost-Share Customers and the dollars returned to ratepayers. The fee shall be calculated at an aggregated, programmatic level for all approved Proactive Distribution Upgrade investments. The fee calculation shall be the total cost of all approved Proactive Distribution Upgrades divided by the total kWac of capacity added by all approved Proactive Distribution Upgrades. This fee shall determine the pro rata cost for any Proactive Cost-Share Customer, load or generation.	22
J.3	When new Proactive Distribution Upgrade Proposals are approved, the total kWac of capacity added and total cost of the newly approved Proactive Distribution Upgrades shall be added respectively to the totals of the previously approved Proactive Distribution Upgrades. The resulting new total kWac of capacity added and total cost of all Proactive Distribution Upgrades shall be used to calculate the new \$/kWac fee that shall be charged to any Proactive Cost-Share Customers beginning after the date the new Proactive Distribution Upgrade Proposal is approved.	23
J.4	Any generation interconnections that are subject to the Priority Queue shall not be Proactive Cost-Share Customers.	Attachment A
J.5	Load interconnections that are demand metered shall be Proactive Cost-Share Customers. Load interconnections that are not demand metered shall not be Proactive Cost-Share Customers.	Attachment A
J.6	Any Proactive Distribution Upgrade costs recovered from ratepayers shall be treated consistent with approved rate case allocators and established revenue requirement procedures.	23

CERTIFICATE OF SERVICE

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

**Minnesota Department of Commerce
Public Comments**

Docket No. E002/M-25-142

Dated this **28th** day of **January 2026**

/s/Sharon Ferguson

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73	Kristen	Eide Tollefson	healingsystems69@gmail.com	R-CURE		28477 N Lake Ave Frontenac MN, 55026-1044 United States	Electronic Service		No	M-25-142
74	Bob	Eleff	bob.eleff@house.mn	Regulated Industries Cmte		100 Rev Dr Martin Luther King Jr Blvd Room 600 St. Paul MN, 55155 United States	Electronic Service		No	M-25-142
75	R. Neal	Elliot	rnelliott@aceee.org	American Council for an Energy-Efficient Economy		ACEEE 529 14th St NW Ste 600 Washington DC, 20045 United States	Electronic Service		No	M-25-142
76	Nadav	Enbar	nenbar@epri.com	EPRI		1117 Quince Ave Boulder CO, 80304 United States	Electronic Service		No	M-25-142
77	John	Farrell	jfarrell@ilsr.org	Institute for Local Self-Reliance		2720 E. 22nd St Institute for Local Self-Reliance Minneapolis MN, 55406 United States	Electronic Service		No	M-25-142
78	Christian	Fenstermacher	christian.fenstermacher@owatonnautilities.com	Owatonna Municipal Public Utilities		PO Box 800 208 S Walnut Ave Owatonna MN, 55060 United States	Electronic Service		No	M-25-142
79	Sharon	Ferguson	sharon.ferguson@state.mn.us		Department of Commerce	85 7th Place E Ste 280 Saint Paul MN, 55101-2198 United States	Electronic Service		No	M-25-142
80	Christine	Fox	cfox@itasca-mantrap.com	Itasca-Mantrap Coop. Electric Assn.		PO Box 192 Park Rapids MN, 56470 United States	Electronic Service		No	M-25-142
81	Kornbaum	Frank	fkornbaum@mnpower.com			null null, null United States	Electronic Service		No	M-25-142
82	Nathan	Franzen	nathan@nationalgridrenewables.com	Geronimo Energy, LLC		8400 Normandale Lake Blvd Ste 1200 Bloomington MN, 55437 United States	Electronic Service		No	M-25-142
83	David	Freestate	dfreestate@epri.com	EPRI		942 Corridor Park Blvd Knoxville TN, 37932 United States	Electronic Service		No	M-25-142
84	Katelyn	Frye	kfrye@mnpower.com	Minnesota Power		30 W Superiot St Duluth MN, 55802-2093 United States	Electronic Service		No	M-25-142

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
85	Jessica	Fyhrie	jfyhrie@otpc.com	Otter Tail Power Company		PO Box 496 Fergus Falls MN, 56538-0496 United States	Electronic Service		No	M-25-142
86	Edward	Garvey	garveyed@aol.com	Residence		32 Lawton St Saint Paul MN, 55102 United States	Electronic Service		No	M-25-142
87	Allen	Gleckner	agleckner@elpc.org	Environmental Law & Policy Center		35 E. Wacker Drive, Suite 1600 Suite 1600 Chicago IL, 60601 United States	Electronic Service		No	M-25-142
88	Jenny	Glumack	jenny@mrea.org	Minnesota Rural Electric Association		11640 73rd Ave N Maple Grove MN, 55369 United States	Electronic Service		No	M-25-142
89	Sean	Gosiewski	sean@afors.org	Alliance for Sustainability		2801 21st Ave S Ste 100 Minneapolis MN, 55407 United States	Electronic Service		No	M-25-142
90	Scott	Greenbert	scott@nautilussolar.com	Nautilus Solar Energy, LLC		396 Springfield Ave, Ste 2 Summit NJ, 07901 United States	Electronic Service		No	M-25-142
91	Sarah	Groeber	sgroeber@redwoodelectric.com	Redwood Electric Cooperative		60 Pine St Clements MN, 56224 United States	Electronic Service		No	M-25-142
92	Tim	Gross	tgross@fuelingmn.com	Fueling Minnesota		3244 Rice Street St. Paul MN, 55126 United States	Electronic Service		No	M-25-142
93	Cody	Gustafson	cgustafson@mnpower.com			null null, null United States	Electronic Service		No	M-25-142
94	Tom	Guttormson	tom.guttormson@connexusenergy.com	Connexus Energy		14601 Ramsey Blvd Ramsey MN, 55303 United States	Electronic Service		No	M-25-142
95	Natalie	Haberman	townsend@fresh-energy.org	Fresh Energy		408 St Peter St # 350 St. Paul MN, 55102 United States	Electronic Service		No	M-25-142
96	Nicholas	Haeg	haeg@fresh-energy.org			12298 Bass Trail Sauk Centre MN, 56378 United States	Electronic Service		No	M-25-142
97	James	Haler	jhaler@southcentralelectric.com	South Central Electric Association		71176 Tiell Dr P. O. Box 150 St. James MN, 56081 United States	Electronic Service		No	M-25-142
98	Joe	Halso	joe.halso@sierraclub.org	Sierra Club		1536 Wynkoop St Ste 200 Denver CO, 80202 United States	Electronic Service		No	M-25-142
99	Donald	Hanson	dfhanson@ieee.org			P. O. Box 44579 Eden Prairie MN, 55344 United States	Electronic Service		No	M-25-142
100	John	Harlander	john.c.harlander@xcelenergy.com	Xcel Energy		null null, null	Electronic Service		No	M-25-142

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						United States				
101	Kim	Havey	kim.havey@minneapolismn.gov	City of Minneapolis		350 South 5th Street, Suite 315M Minneapolis MN, 55415 United States	Electronic Service		No	M-25-142
102	Todd	Headlee	theadlee@dvigridsolutions.com	Dominion Voltage, Inc.		701 E. Cary Street Richmond VA, 23219 United States	Electronic Service		No	M-25-142
103	Amber	Hedlund	amber.r.hedlund@xcelenergy.com	Northern States Power Company dba Xcel Energy-Elec		414 Nicollet Mall, 401-7 Minneapolis MN, 55401 United States	Electronic Service		No	M-25-142
104	Tiana	Heger	theger@mnpower.com	Minnesota Power		30 W. Superior Street Duluth MN, 55802 United States	Electronic Service		No	M-25-142
105	Adam	Heinen	aheinen@dakotaelectric.com	Dakota Electric Association		4300 220th St W Farmington MN, 55024 United States	Electronic Service		No	M-25-142
106	Annete	Henkel	mui@mutilityinvestors.org	Minnesota Utility Investors		413 Wacouta Street #230 St.Paul MN, 55101 United States	Electronic Service		No	M-25-142
107	Jessy	Hennesy	jessy.hennesy@avantenergy.com	Avant Energy		220 S. Sixth St. Ste 1300 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-142
108	Mari	Hernandez	mari@irecusa.org	IREC		null null, null United States	Electronic Service		No	M-25-142
109	Katherine	Hinderlie	katherine.hinderlie@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	445 Minnesota St Suite 1400 St. Paul MN, 55101-2134 United States	Electronic Service		No	M-25-142
110	Joe	Hoffman	ja.hoffman@smmpa.org	SMMPA		500 First Ave SW Rochester MN, 55902-3303 United States	Electronic Service		No	M-25-142
111	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	M-25-142
112	Casey	Horan	choran@edf.org	Environmental Defense Fund		123 Mission St San Francisco CA, 94105 United States	Electronic Service		No	M-25-142
113	Ronald	Horman	rhorman@redwoodelectric.com	Redwood Electric Cooperative		60 Pine Street Clements MN, 56224 United States	Electronic Service		No	M-25-142
114	Frank	Hornstein	frank.hornstein@minneapolismn.gov	City of Minneapolis		350 S. 5th Street Room M 301 Minneapolis MN, 55415 United States	Electronic Service		No	M-25-142

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
115	Samantha	Houston	shouston@ucsusa.org	Union of Concerned Scientists		1825 K St. NW Ste 800 Washington DC, 20006 United States	Electronic Service		No	M-25-142
116	Lori	Hoyum	lhoyum@mnpower.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	M-25-142
117	Jan	Hubbard	jan.hubbard@comcast.net			7730 Mississippi Lane Brooklyn Park MN, 55444 United States	Electronic Service		No	M-25-142
118	Dean	Hunter	dean.hunter@state.mn.us		Minnesota Department of Labor & Industry	443 Lafayette Rd N St. Paul MN, 55155-4341 United States	Electronic Service		No	M-25-142
119	Reuben	Hunter	bhunter@madisonei.com	Madison Energy Investments		8100 Boone Blvd Suite 430 Vienna VA, 22182 United States	Electronic Service		No	M-25-142
120	Casey	Jacobson	cjacobson@bepc.com	Basin Electric Power Cooperative		1717 East Interstate Avenue Bismarck ND, 58501 United States	Electronic Service		No	M-25-142
121	John S.	Jaffray	jjaffray@jjrpower.com	JJR Power		350 Highway 7 Suite 236 Excelsior MN, 55331 United States	Electronic Service		No	M-25-142
122	Robert	Jagusch	rjagusch@mmua.org	MMUA		3025 Harbor Lane N Minneapolis MN, 55447 United States	Electronic Service		No	M-25-142
123	Chris	Jarosch	chris@carrcreekelectricservice.com	Carr Creek Electric Service, LLC		209 Sommers Street North Hudson WI, 54016 United States	Electronic Service		No	M-25-142
124	Alan	Jenkins	aj@jenkinsatlaw.com	Jenkins at Law		2950 Yellowtail Ave. Marathon FL, 33050 United States	Electronic Service		No	M-25-142
125	Richard	Johnson	rick.johnson@lawmoss.com	Moss & Barnett		150 S. 5th Street Suite 1200 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-142
126	Sarah	Johnson Phillips	sjphillips@stoel.com	Stoel Rives LLP		33 South Sixth Street Suite 4200 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-142
127	Nate	Jones	njones@hcpd.com	Heartland Consumers Power		PO Box 248 Madison SD, 57042 United States	Electronic Service		No	M-25-142
128	Philip	Jones	phil@evtransportationalliance.org			1402 Third Ave Ste 1315 Seattle WA, 98101 United States	Electronic Service		No	M-25-142
129	Julie	Jorgensen	julie@greenmark.us.com	Greenmark Solar		4630 Quebec Ave N New Hope	Electronic Service		No	M-25-142

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						MN, 55428-4973 United States				
130	Kevin	Joyce	kjoyce@tesla.com			null null, null United States	Electronic Service		No	M-25-142
131	Mahmoud	Kabalan	mahmoud.kabalan@stthomas.edu	University of St Thomas		2115 Summit Ave. Mail OSS100 School of Engineering Saint Paul MN, 55105 United States	Electronic Service		No	M-25-142
132	Camille	Kadoch	ckadoch@raponline.org	Regulatory Assistance Project		50 State Street Suite 3 Montpelier VT, 05602 United States	Electronic Service		No	M-25-142
133	Cliff	Kaehler	cliff.kaehler@novelenergy.biz	Novel Energy Solutions LLC		4710 Blaylock Way Inver Grove Heights MN, 55076 United States	Electronic Service		No	M-25-142
134	Ralph	Kaehler	ralph.kaehler@gmail.com			13700 Co. Rd. 9 Eyota MN, 55934 United States	Electronic Service		No	M-25-142
135	Michael	Kampmeyer	mkampmeyer@a-e-group.com	AEG Group, LLC		260 Salem Church Road Sunfish Lake MN, 55118 United States	Electronic Service		No	M-25-142
136	Nick	Kaneski	nick.kaneski@enbridge.com	Enbridge Energy Company, Inc.		11 East Superior St Ste 125 Duluth MN, 55802 United States	Electronic Service		No	M-25-142
137	Jack	Kegel	jkegel@mmua.org	MMUA		3025 Harbor Lane N Suite 400 Plymouth MN, 55447-5142 United States	Electronic Service		No	M-25-142
138	William	Kenworthy	will@votesolar.org			1 South Dearborn St Ste 2000 Chicago IL, 60603 United States	Electronic Service		No	M-25-142
139	Samuel B.	Ketchum	sketchum@kennedy-graven.com	Kennedy & Graven, Chartered		150 S 5th St Ste 700 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-142
140	Tom	Key	tkey@epri.com	EPRI		942 Corridor Park Blvd Knoxville TN, 37932 United States	Electronic Service		No	M-25-142
141	Bobby	King	bking@solarunitedneighbors.org	Solar United Neighbors		3140 43rd Ave S Minneapolis MN, 55406 United States	Electronic Service		No	M-25-142
142	Jack	Kluempke	jack.kluempke@state.mn.us		Department of Commerce	85 7th Place East Suite 600 St. Paul MN, 55101 United States	Electronic Service		No	M-25-142
143	Aaron	Knoll	aknoll@greeneespel.com	Greene Espel PLLP		222 South Ninth Street Suite 2200 Minneapolis	Electronic Service		No	M-25-142

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						MN, 55402 United States				
144	Steve	Kosbab	skosbab@meeker.coop	Meeker Cooperative Light and Power		1725 US Hwy 12 E Litchfield MN, 55355 United States	Electronic Service		No	M-25-142
145	Nathan	Kostiuk	nathan.c.kostiuk@xcelenergy.com	Xcel Energy		414 Nicollet Mall, 401-07 Minneapolis MN, 55401 United States	Electronic Service		No	M-25-142
146	Brian	Krambeer	bkrambeer@mienergy.coop	MiEnergy Cooperative		PO Box 626 31110 Cooperative Way Rushford MN, 55971 United States	Electronic Service		No	M-25-142
147	Michael	Krause	michaelkrause61@yahoo.com			1200 Plymouth Avenue Minneapolis MN, 55411 United States	Electronic Service		No	M-25-142
148	Michael	Krikava	mkrikava@taftlaw.com	Taft Stettinius & Hollister LLP		2200 IDS Center 80 S 8th St Minneapolis MN, 55402 United States	Electronic Service		No	M-25-142
149	Corrina	Kumpe	ckumpe@mysunshare.com			null null, null United States	Electronic Service		No	M-25-142
150	Matthew	Lacey	mlacey@grenergy.com	Great River Energy		12300 Elm Creek Boulevard Maple Grove MN, 55369-4718 United States	Electronic Service		No	M-25-142
151	James D.	Larson	james.larson@avantenergy.com	Avant Energy Services		220 S 6th St Ste 1300 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-142
152	Mark	Larson	mlarson@meeker.coop	Meeker Coop Light & Power Assn		1725 Highway 12 E Ste 100 Litchfield MN, 55355 United States	Electronic Service		No	M-25-142
153	Burnell	Lauer	blauer.sundial@gmail.com	Sundial Solar		3209 W. 76th St #305 Edina MN, 55435 United States	Electronic Service		No	M-25-142
154	Dean	Leischow	dean@sunrisenrg.com	Sunrise Energy Ventures		315 Manitoba Ave Ste 200 Wayzata MN, 55391 United States	Electronic Service		No	M-25-142
155	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	M-25-142
156	Benjamin	Levine	blevine@mnpower.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	M-25-142
157	Becky	Li	bli@rmi.org			17 State St 25th floor unit 2500 New York NY,	Electronic Service		No	M-25-142

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						10004 United States				
158	Amy	Liberkowski	amy.a.liberkowski@xcelenergy.com	Xcel Energy		414 Nicollet Mall 7th Floor Minneapolis MN, 55401-1993 United States	Electronic Service		No	M-25-142
159	Carl	Linville	clivill@raponline.org			50 State Street Suite #3 Montpelier VT, 05602 United States	Electronic Service		No	M-25-142
160	Phillip	Lipetsky	greenenergyproductsllc@gmail.com	Green Energy Products		PO Box 108 Springfield MN, 56087 United States	Electronic Service		No	M-25-142
161	Jody	Londo	jody.l.londo@xcelenergy.com	Xcel Energy		414 Nicollet Mall 7th Floor Minneapolis MN, 55401-1993 United States	Electronic Service		No	M-25-142
162	Susan	Ludwig	sludwig@mnpower.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	M-25-142
163	Brian	Lydic	brian@irecusa.org	Interstate Renewable Energy Council, Inc.		PO Box 1156 Latham NY, 12110-1156 United States	Electronic Service		No	M-25-142
164	Madeline	Lydon	madeline.k.lydon@xcelenergy.com	Xcel Energy		401 NICOLLET MALL Floor 7 Minneapolis MN, 55401 United States	Electronic Service		No	M-25-142
165	Richard	Macke	macker@powersystem.org	Power System Engineering, Inc.		10710 Town Square Dr NE Ste 201 Minneapolis MN, 55449 United States	Electronic Service		No	M-25-142
166	Alice	Madden	alice@communitypowermn.org	Community Power		2720 E 22nd St Minneapolis MN, 55406 United States	Electronic Service		No	M-25-142
167	Alex	Magerko	amagerko@epri.com	EPRI		942 Corridor Park Blvd Knoxville TN, 37932 United States	Electronic Service		No	M-25-142
168	Kavita	Maini	kmaini@wi.rr.com	KM Energy Consulting, LLC		961 N Lost Woods Rd Oconomowoc WI, 53066 United States	Electronic Service		No	M-25-142
169	Tom	Mammen	thomas.j.mammen@xcelenergy.com	Xcel Energy		null null, null United States	Electronic Service		No	M-25-142
170	Discovery	Manager	discoverymanager@mnpower.com	Minnesota Power		30 W Superior St Duluth MN, 55802 United States	Electronic Service		No	M-25-142
171	Christine	Marquis	regulatory.records@xcelenergy.com	Xcel Energy		414 Nicollet Mall MN1180-07-MCA Minneapolis	Electronic Service		Yes	M-25-142

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						MN, 55401 United States				
172	Gregg	Mast	gmast@cleanenergyeconomymn.org	Clean Energy Economy Minnesota		4808 10th Avenue S Minneapolis MN, 55417 United States	Electronic Service		No	M-25-142
173	Jason	Maur	jason.maur@renesolapower.com	Renesola Power Holdings, LLC		850 Canal Street 3rd Floor Stamford CT, 06902 United States	Electronic Service		No	M-25-142
174	Erica	McConnell	emcconnell@elpc.org	Environmental Law & Policy Center		35 E. Wacker Drive, Suite 1600 Chicago IL, 60601 United States	Electronic Service		No	M-25-142
175	Jess	McCullough	jmccullough@mnpower.com	Minnesota Power		30 W Superior St Duluth MN, 55802 United States	Electronic Service		No	M-25-142
176	Sara G	McGrane	smcgrane@felhaber.com	Felhaber Larson		220 S 6th St Ste 2200 Minneapolis MN, 55420 United States	Electronic Service		No	M-25-142
177	Natalie	McIntire	natalie.mcintire@gmail.com	Wind on the Wires		570 Asbury St Ste 201 Saint Paul MN, 55104-1850 United States	Electronic Service		No	M-25-142
178	Matthew	Melewski	matthew@theboutiquefirm.com	Nokomis Energy LLC & Ole Solar LLC		2639 Nicollet Ave Ste 200 Minneapolis MN, 55408 United States	Electronic Service		No	M-25-142
179	Thomas	Melone	thomas.melone@allcous.com	Minnesota Go Solar LLC		222 South 9th Street Suite 1600 Minneapolis MN, 55120 United States	Electronic Service		No	M-25-142
180	Michael	Menzel	mike.m@sagiliti.com	Sagiliti		23505 Smithtown Rd. Suite 280 Excelsior MN, 55331 United States	Electronic Service		No	M-25-142
181	Tim	Mergen	tmergen@meeker.coop	Meeker Cooperative Light And Power		1725 US Hwy 12 E. Suite 100 PO Box 68 Litchfield MN, 55355 United States	Electronic Service		No	M-25-142
182	Pontius	Mike	mpontius@mnpower.com			null null, null United States	Electronic Service		No	M-25-142
183	Brian	Millberg	fwengineering@comcast.net			695 Grand Ave #222 Saint Paul MN, 55105 United States	Electronic Service		No	M-25-142
184	Luther	Miller	luther.c.miller@xcelenergy.com	Xcel Energy		null null, null United States	Electronic Service		No	M-25-142
185	Marc	Miller	mmiller@soltage.com	Soltage, LLC		66 York Street, 5th Floor Jersey City NJ, 07302 United States	Electronic Service		No	M-25-142

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
186	Marcus	Mills	marcus@communitypowermn.org	Community Power		2720 E 22nd St Minneapolis MN, 55406 United States	Electronic Service		No	M-25-142
187	Darrick	Moe	darrick@mrea.org	Minnesota Rural Electric Association		11640 73rd Ave N Maple Grove MN, 55369 United States	Electronic Service		No	M-25-142
188	David	Moeller	dmoeller@allete.com	Minnesota Power			Electronic Service		No	M-25-142
189	Dalene	Monsebroten	dalene.monsebroten@nmpagency.com	Northern Municipal Power Agency		123 2nd St W Thief River Falls MN, 56701 United States	Electronic Service		No	M-25-142
190	Brian	Monson	brian.t.monson@xcelenergy.com	Xcel Energy		null null, null United States	Electronic Service		No	M-25-142
191	Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP		33 South Sixth St Ste 4200 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-142
192	Susan	Mudd	smudd@elpc.org	Environmental Law and Policy Center		35 E. Wacker Drive, Suite 1600 Chicago IL, 60601 United States	Electronic Service		No	M-25-142
193	Pouya	Najmaie	najm0001@gmail.com	Cooperative Energy Futures		3416 16th Ave S Minneapolis MN, 55407 United States	Electronic Service		No	M-25-142
194	Alex	Nelson	anelson@dakotaelectric.com	Dakota Electric Association		4300 220nd St Farmington MN, 55024 United States	Electronic Service		No	M-25-142
195	Anthony	Nelson	amnelson@otpc.com	Ottertail Power		53233 Sunrise Ln Park Rapids MN, 56470 United States	Electronic Service		No	M-25-142
196	Ben	Nelson	benn@cmpasgroup.org	CMMPA		459 South Grove Street Blue Earth MN, 56013 United States	Electronic Service		No	M-25-142
197	Carl	Nelson	cnelson@mncee.org	Center for Energy and Environment		212 3rd Ave N Ste 560 Minneapolis MN, 55401 United States	Electronic Service		No	M-25-142
198	Darin	Nelson	dnelson@minnetonkamn.gov	City of Minnetonka		14600 Minnetonka Blvd Minnetonka MN, 55345 United States	Electronic Service		No	M-25-142
199	David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency		220 South Sixth Street Suite 1300 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-142
200	Sephra	Ninow	sephra.ninow@energycenter.org	Center for Sustainable Energy		426 17th Street, Suite 700 Oakland CA, 94612 United States	Electronic Service		No	M-25-142
201	Michael	Noble	noble@fresh-energy.org	Fresh Energy		408 Saint Peter St Ste	Electronic Service		No	M-25-142

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						350 Saint Paul MN, 55102 United States				
202	Rolf	Nordstrom	rnordstrom@gpisd.net	Great Plains Institute		2801 21ST AVE S STE 220 Minneapolis MN, 55407-1229 United States	Electronic Service		No	M-25-142
203	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	M-25-142
204	David	O'Brien	david.obrien@navigant.com	Navigant Consulting		77 South Bedford St Ste 400 Burlington MA, 01803 United States	Electronic Service		No	M-25-142
205	Logan	O'Grady	logrady@mnseia.org	Minnesota Solar Energy Industries Association		2288 University Ave W St. Paul MN, 55114 United States	Electronic Service		No	M-25-142
206	Patty	O'Keefe	patty.okeefe@sierraclub.org			2525 Emerson Ave S Apt 2 Minneapolis MN, 55405 United States	Electronic Service		No	M-25-142
207	Timothy	O'Leary	toleary@llec.coop	Lyon-Lincoln Electric Cooperative, Inc		P.O. Box 639 Tyler MN, 56178-0639 United States	Electronic Service		No	M-25-142
208	Jeff	O'Neill	jeff.oneill@ci.monticello.mn.us	City of Monticello		505 Walnut Street Suite 1 Monticello MN, 55362 United States	Electronic Service		No	M-25-142
209	Matthew	Olsen	molsen@otpc.com	Otter Tail Power Company		215 South Cascade Street Fergus Falls MN, 56537 United States	Electronic Service		No	M-25-142
210	Russell	Olson	rolson@hcpd.com	Heartland Consumers Power District		PO Box 248 Madison SD, 57042-0248 United States	Electronic Service		No	M-25-142
211	Wendi	Olson	wolson@otpc.com	Otter Tail Power Company		215 South Cascade Street Fergus Falls MN, 56537 United States	Electronic Service		No	M-25-142
212	Carol A.	Overland	overland@legalelectric.org	Legalelectric - Overland Law Office		1110 West Avenue Red Wing MN, 55066 United States	Electronic Service		No	M-25-142
213	Bethany	Owen	bowen@mnpower.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	M-25-142
214	Cezar	Panait	cezar.panait@state.mn.us		Public Utilities Commission	121 7th Place East Suite 350 St. Paul MN, 55101 United States	Electronic Service		No	M-25-142

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
215	Dan	Patry	dpatry@sunedison.com	SunEdison		600 Clipper Drive Belmont CA, 94002 United States	Electronic Service		No	M-25-142
216	Jeffrey C	Paulson	jeff.jcplaw@comcast.net	Paulson Law Office, Ltd.		4445 W 77th Street Suite 224 Edina MN, 55435 United States	Electronic Service		No	M-25-142
217	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	M-25-142
218	Susan	Peirce	susan.peirce@state.mn.us		Department of Commerce	85 Seventh Place East St. Paul MN, 55101 United States	Electronic Service		No	M-25-142
219	Mary Beth	Peranteau	mperanteau@fredlaw.com	Fredrikson & Byron, P.A.		44 East Mifflin Street Suite 1000 Madison WI, 53703 United States	Electronic Service		No	M-25-142
220	Jennifer	Peterson	jppeterson@mnpower.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	M-25-142
221	Wess	Pfaff	wes.pfaff@mrenergy.com			null null, null United States	Electronic Service		No	M-25-142
222	Ryan	Pierce	ryan.m.pierce@xcelenergy.com	Xcel Energy		null null, null United States	Electronic Service		No	M-25-142
223	Morgan	Pitz	morgan.pitz@us-solar.com	US Solar		100 N 6th St #410B Minneapolis MN, 55403 United States	Electronic Service		No	M-25-142
224	Hannah	Polikov	hpolikov@aee.net	Advanced Energy Economy Institute		1000 Vermont Ave, Third Floor Washington DC, 20005 United States	Electronic Service		No	M-25-142
225	Crystal	Pomerleau	crystal.r.pomerleau@xcelenergy.com	Xcel		null null, null United States	Electronic Service		No	M-25-142
226	Kristel	Porter	kristel@mnrenewablenow.org	MN Renewable Now		null null, null United States	Electronic Service		No	M-25-142
227	Paula	Prahl	paula.prahl@dominiuminc.com	Dominium		2905 Northwest Blvd Ste 150 Plymouth MN, 55441 United States	Electronic Service		No	M-25-142
228	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	M-25-142
229	David G.	Prazak	dprazak@otpc.com	Otter Tail Power Company		P.O. Box 496 215 South Cascade Street Fergus Falls MN, 56538-0496 United States	Electronic Service		No	M-25-142

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
230	Matt	Privratsky	matt@nokomisenergy.com	Nokomis Energy		2639 Nicollet Ave Suite 200 Minneapolis MN, 55408 United States	Electronic Service		No	M-25-142
231	Elizabeth	Psihos	elizabeth.psihos@idealenergies.com			null null, null United States	Electronic Service		No	M-25-142
232	Bridget	Rathsack	bridget.rathsack@burnsvilllemn.gov	City of Burnsville, MN		100 Civic Center Parkway Burnsville MN, 55337 United States	Electronic Service		No	M-25-142
233	Peter	Reese	preese@sundialsolarenergy.com	Sundial Energy, LLC		3363 Republic Ave Saint Louis Park MN, 55426 United States	Electronic Service		No	M-25-142
234	Generic Notice	Regulatory	regulatory_filing_coordinators@otpc.com	Otter Tail Power Company		215 S. Cascade Street Fergus Falls MN, 56537 United States	Electronic Service		No	M-25-142
235	John C.	Reinhardt		Laura A. Reinhardt		3552 26th Ave S Minneapolis MN, 55406 United States	Paper Service		No	M-25-142
236	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	M-25-142
237	Kevin	Reuther	kreuther@mncenter.org	MN Center for Environmental Advocacy		26 E Exchange St, Ste 206 St. Paul MN, 55101-1667 United States	Electronic Service		No	M-25-142
238	Micah	Revell	micah.revell@stinson.com	Stinson LLP		50 South Sixth St Ste 2600 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-142
239	Michael	Riewer	mriewer@otpc.com	Otter Tail Power Company		PO Box 4496 Fergus Falls MN, 56538-0496 United States	Electronic Service		No	M-25-142
240	Jonathan	Roberts	jroberts@soltage.com	Soltage		66 York St 5th Floor Jersey City NJ, 07302 United States	Electronic Service		No	M-25-142
241	Noah	Roberts	nroberts@cleanpower.org	Energy Storage Association		1155 15th St NW, Ste 500 Washington DC, 20005 United States	Electronic Service		No	M-25-142
242	Kristi	Robinson	krobinson@star-energy.com	STAR Energy Services, LLC		1401 South Broadway Pelican Rapids MN, 56572 United States	Electronic Service		No	M-25-142
243	Daniel	Rogers	dan@nokomispartners.com			2639 Nicollet Ave Ste 200 Minneapolis MN, 55408 United States	Electronic Service		No	M-25-142

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
244	Michael	Ruiz	michael.ruiz@xcelenergy.com	Xcel Energy		null null, null United States	Electronic Service		No	M-25-142
245	Nathaniel	Runke	nrunke@local49.org			611 28th St. NW Rochester MN, 55901 United States	Electronic Service		No	M-25-142
246	Darla	Ruschen	d.ruschen@bcrea.coop	Brown County Rural Electrical Association		PO Box 529 24386 State Highway 4 Sleepy Eye MN, 56085 United States	Electronic Service		No	M-25-142
247	Delaney	Russell	delaney@mnipl.org	Just Solar Coalition		4407 E Lake Street Minneapolis MN, 55407 United States	Electronic Service		No	M-25-142
248	Kwadwo	Safo	ksafo@dakotaelectric.com	Dakota Electric Association		null null, null United States	Electronic Service		No	M-25-142
249	Robert K.	Sahr	bsahr@eastriver.coop	East River Electric Power Cooperative		P.O. Box 227 Madison SD, 57042 United States	Electronic Service		No	M-25-142
250	Ian	SantosMeeker	ians@ips-solar.com	IPS Solar		null null, null United States	Electronic Service		No	M-25-142
251	Joseph L	Sathe	jsathe@kennedy-graven.com	Kennedy & Graven, Chartered		150 S 5th St Ste 700 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-142
252	Kenric	Scheevel	kjs@dairynet.com	Dairyland Power Cooperative		3200 East Ave S PO Box 817 La Crosse WI, 54602 United States	Electronic Service		No	M-25-142
253	Dean	Schiro	dean.e.schiro@xcelenergy.com	Xcel Energy		null null, null United States	Electronic Service		No	M-25-142
254	Jacob J.	Schlesinger	jschlesinger@keyesfox.com	Keyes & Fox LLP		1580 Lincoln St Ste 880 Denver CO, 80203 United States	Electronic Service		No	M-25-142
255	Jeff	Schoenecker	jschoenecker@dakotaelectric.com	Dakota Electric Association		4300 220th Street W Farmington MN, 55024 United States	Electronic Service		No	M-25-142
256	Peter	Scholtz	peter.scholtz@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	Suite 1400 445 Minnesota Street St. Paul MN, 55101-2131 United States	Electronic Service		No	M-25-142
257	Kay	Schraeder	kschraeder@minnkota.com	Minnkota Power		5301 32nd Ave S Grand Forks ND, 58201 United States	Electronic Service		No	M-25-142
258	Matthew	Schuerger	matthew.schuerger@state.mn.us		Public Utilities Commission	121 7th Place East Suite 350 St. Paul MN, 55101 United States	Electronic Service		No	M-25-142
259	Ronald J.	Schwartau	rschwartau@noblesce.com	Nobles Electric Cooperative		22636 U.S. Hwy. 59 Worthington MN, 56187 United States	Electronic Service		No	M-25-142

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
260	Rob	Scott Hovland	rob.scott-hovland@mrenergy.com	Missouri River Energy Services		3724 W Avera Dr PO Box 88920 Sioux Falls SD, 57109-8920 United States	Electronic Service		No	M-25-142
261	Emma	Searson	esearson@solarunitedneighbors.org	Solar United Neighbors		646 S Barrington Ave Apt 101 Los Angeles CA, 90049 United States	Electronic Service		No	M-25-142
262	Dean	Sedgwick	sedgwick@itascapower.com	Itasca Power Company		PO Box 455 Spring Lake MN, 56680 United States	Electronic Service		No	M-25-142
263	Maria	Seidler	maria.seidler@dom.com	Dominion Energy Technology		120 Tredegar Street Richmond VA, 23219 United States	Electronic Service		No	M-25-142
264	David	Shaffer	david.shaffer@novelenergy.biz	Novel Energy Solutions		2303 Wycliff St Ste 300 St. Paul MN, 55114 United States	Electronic Service		No	M-25-142
265	Patricia	Sharkey	psharkey@environmentallawcounsel.com	Midwest Cogeneration Association.		180 N LaSalle St Ste 3700 Chicago IL, 60601 United States	Electronic Service		No	M-25-142
266	Christopher L.	Sherman	csherman@sherman-associates.com	Solar Holdings LLC		233 Park Ave S Ste 201 Minneapolis MN, 55415 United States	Electronic Service		No	M-25-142
267	Doug	Shoemaker	dougs@charter.net	Minnesota Renewable Energy		2928 5th Ave S Minneapolis MN, 55408 United States	Electronic Service		No	M-25-142
268	Felicia	Skaggs	fskaggs@meeker.coop	Meeker Cooperative Light & Power		1725 US Highway 12 E Suite 100 Litchfield MN, 55355 United States	Electronic Service		No	M-25-142
269	Glen	Skarbakka	glen@s-pllc.com	Skarbakka PLLC		5411 Bartlett Blvd Mound MN, 55364 United States	Electronic Service		No	M-25-142
270	Anne	Smart	anne.smart@chargepoint.com	ChargePoint, Inc.		254 E Hacienda Ave Campbell CA, 95008 United States	Electronic Service		No	M-25-142
271	Joshua	Smith	joshua.smith@sierraclub.org			85 Second St FL 2 San Francisco CA, 94105 United States	Electronic Service		No	M-25-142
272	Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.		76 W Kellogg Blvd St. Paul MN, 55102 United States	Electronic Service		No	M-25-142
273	Trevor	Smith	trevor.smith@avantenergy.com	Avant Energy, Inc.		220 South Sixth Street Suite 1300 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-142

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
274	Rafi	Sohail	rafi.sohail@centerpointenergy.com	CenterPoint Energy		800 LaSalle Avenue P.O. Box 59038 Minneapolis MN, 55459-0038 United States	Electronic Service		No	M-25-142
275	Beth	Soholt	bsoholt@cleangridalliance.org	Clean Grid Alliance		570 Asbury Street Suite 201 St. Paul MN, 55104 United States	Electronic Service		No	M-25-142
276	Marcia	Solie	m.solie@bcrea.coop	Brown County Rural Electrical Association		24386 State Hwy. 4, PO Box 529 Sleepy Eye MN, 56085 United States	Electronic Service		No	M-25-142
277	Braden	Solum	braden.solum@idealenergies.com	iDEAL Energies		5810 Nicollet Ave Minneapolis MN, 55419 United States	Electronic Service		No	M-25-142
278	Karl	Sonneman	karl17@hbc.com	Law Office of Karl W. Sonneman		111 Riverfront Suite 202 Winona MN, 55987 United States	Electronic Service		No	M-25-142
279	Brandon	Stamp	brandon.j.stamp@xcelenergy.com	Xcel Energy		401 Nicollet Mall Minneapolis MN, 55401 United States	Electronic Service		No	M-25-142
280	Sky	Stanfield	stanfield@smwlaw.com	Shute, Mihaly & Weinberger		396 Hayes Street San Francisco CA, 94102 United States	Electronic Service		No	M-25-142
281	Russ	Stark	russ.stark@ci.stpaul.mn.us	City of St. Paul		Mayor's Office 15 W. Kellogg Blvd., Suite 390 Saint Paul MN, 55102 United States	Electronic Service		No	M-25-142
282	Byron E.	Starns	byron.starns@stinson.com	STINSON LLP		50 S 6th St Ste 2600 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-142
283	Kristin	Stastny	kstastny@taftlaw.com	Taft Stettinius & Hollister LLP		2200 IDS Center 80 South 8th Street Minneapolis MN, 55402 United States	Electronic Service		No	M-25-142
284	Lindsey	Stegall	lindsey.stegall@evgo.com	EVgo Services, LLC		11835 W Olympic Blvd Ste 900E Los Angeles CA, 90064 United States	Electronic Service		No	M-25-142
285	Cary	Stephenson	cstephenson@otpc.com	Otter Tail Power Company		215 South Cascade Street Fergus Falls MN, 56537 United States	Electronic Service		No	M-25-142
286	Chad	Stevenson	chad.stevenson@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	445 Minnesota St. Suite 1400 St. Paul MN, 55101 United States	Electronic Service		No	M-25-142

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
287	Tammy	Sundbom	tsundbom@mnpower.com	Minnesota Power		null null, null United States	Electronic Service		No	M-25-142
288	Sherry	Swanson	sswanson@noblesce.com	Nobles Cooperative Electric		22636 US Highway 59 PO Box 788 Worthington MN, 56187 United States	Electronic Service		No	M-25-142
289	Boratha	Tan	btan@votesolar.org	Vote Solar		null null, null United States	Electronic Service		No	M-25-142
290	Bryant	Tauer	btauer@whe.org	Wright-Hennepin		6800 Electric Dr Rockford MN, 55373 United States	Electronic Service		No	M-25-142
291	Dean	Taylor	dtaylor@pluginamerica.org	Plug In America		6380 Wilshire Blvd, Suite 1000 Los Angeles CA, 90048 United States	Electronic Service		No	M-25-142
292	Whitney	Terrill	whitney@mnipl.org	Minnesota Interfaith Power & Light		null null, null United States	Electronic Service		No	M-25-142
293	Daniel	Tikk	daniel.tikk@state.mn.us		Department of Commerce	85 7th Place East Suite 280 Saint Paul MN, 55101 United States	Electronic Service		No	M-25-142
294	Kate	Tohme	ktohme@newleafenergy.com	New Leaf Energy		null null, null United States	Electronic Service		No	M-25-142
295	Stuart	Tommerdahl	stommerdahl@otpc.com	Otter Tail Power Company		215 S Cascade St PO Box 496 Fergus Falls MN, 56537 United States	Electronic Service		No	M-25-142
296	Taige	Tople	taige.d.tople@xcelenergy.com	Northern States Power Company dba Xcel Energy-Elec		414 Nicollet Mall 401 7th Floor Minneapolis MN, 55401 United States	Electronic Service		No	M-25-142
297	Jason	Topp	jason.topp@lumen.com	Qwest Communications Company, LLC.		200 S 5th St Ste 2200 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-142
298	Emma Marshall	Torres	emarshall-torres@convergentep.com			null null, null United States	Electronic Service		No	M-25-142
299	Zack	Townsend	zachary.townsend@brookfieldrenewable.com	Brookfield Renewable		200 Liberty St FL 14 New York NY, 10281 United States	Electronic Service		No	M-25-142
300	Pat	Treseler	pat.jcplaw@comcast.net	Paulson Law Office LTD		4445 W 77th Street Suite 224 Edina MN, 55435 United States	Electronic Service		No	M-25-142
301	Jeff	Triplett	triplettj@powersystem.org	MREA		10710 Town Square Dr NW St 201 Minneapolis MN, 55449 United States	Electronic Service		No	M-25-142
302	Adam	Tromblay	atromblay@noblesce.com	Nobles Cooperative Electric		P.O. Box 58 Slayton MN, 56127-0058 United States	Electronic Service		No	M-25-142

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303	Lise	Trudeau	lise.trudeau@state.mn.us		Department of Commerce	85 7th Place East Suite 500 Saint Paul MN, 55101 United States	Electronic Service		No	M-25-142
304	Alan	Urban	alan.m.urban@xcelenergy.com	Xcel Energy		null null, null United States	Electronic Service		No	M-25-142
305	Matt	Van Arkel	mvanarkel@newleafenergy.com			55 Technology Drive Suite 102 Lowell MA, 01851 United States	Electronic Service		No	M-25-142
306	Gary	Van Winkle	gvanwinkle@mylegalaid.org	Mid-Minnesota Legal Aid		111 N Fifth St Ste 100 Minneapolis MN, 55403 United States	Electronic Service		No	M-25-142
307	John	Vaughn	nik@rreal.org	Rural Renewable Energy Alliance		3963 8th Street SW Backus MN, 55435 United States	Electronic Service		No	M-25-142
308	Ellen	Veazey	lveazey@solarunitedneighbors.org	Solar United Neighbors		1350 Connecticut Ave NW Ste 412 Washington DC, 20036 United States	Electronic Service		No	M-25-142
309	Sam	Villella	sdvillella@gmail.com			10534 Alamo Street NE Blaine MN, 55449 United States	Electronic Service		No	M-25-142
310	Curt	Volkmann	curt@newenergy-advisors.com	Fresh Energy		408 St Peter St Saint Paul MN, 55102 United States	Electronic Service		No	M-25-142
311	Wendy	Vorasane	wendy.vorasane@idealenergies.com			null null, null United States	Electronic Service		No	M-25-142
312	Robert J.V.	Vose	rvose@kennedy-graven.com	Kennedy & Graven, Chartered		150 S 5th St Ste 700 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-142
313	Stacy	Wahlund	swahlund@otpc.com	Otter Tail Power Company		215 S. Cascade St Fergus Falls MN, 56537 United States	Electronic Service		No	M-25-142
314	Sarah	Walinga	swalinga@solarcity.com	Energy Freedom Coalition		3055 Clearview Way San Mateo MN, 94402 United States	Electronic Service		No	M-25-142
315	Kevin	Walker	kwalker@beaconinterfaith.org	Beacon Interfaith Housing Collaborative		null null, null United States	Electronic Service		No	M-25-142
316	Roger	Warehime	roger.warehime@owatonnautilities.com	Owatonna Municipal Public Utilities - Gas		208 S Walnut Ave PO BOX 800 Owatonna MN, 55060 United States	Electronic Service		No	M-25-142
317	Jenna	Warmuth	jwarmuth@mnpower.com	Minnesota Power		30 W Superior St Duluth MN, 55802-2093 United States	Electronic Service		No	M-25-142

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
318	Samantha	Weaver	samantha@communitysolaraccess.org	Coalition for Community Solar Access		1380 Monroe St. Washington DC DC, 20010 United States	Electronic Service		No	M-25-142
319	Elizabeth	Wefel	eawefel@flaherty-hood.com	Missouri River Energy Services		525 Park St Ste 470 Saint Paul MN, 55103 United States	Electronic Service		No	M-25-142
320	Sarah	Whebbe	swhebbe@mnseia.org	MnSEIA		445 Minnesota Street Suite 730 St. Paul MN, 55101 United States	Electronic Service		No	M-25-142
321	Joshua	Williams	joshua@highlandfleets.com	Highland Electric Fleets		200 Cummings Center Suite 273-D Beverly MA, 01915 United States	Electronic Service		No	M-25-142
322	Laurie	Williams	laurie.williams@sierraclub.org	Sierra Club		Environmental Law Program 1536 Wynkoop St Ste 200 Denver CO, 80202 United States	Electronic Service		No	M-25-142
323	John	Williamson	john.williamson@state.mn.us	Minnesota Department of Labor and Industry		443 Lafayette Rd N St. Paul MN, 55155-4341 United States	Electronic Service		No	M-25-142
324	Anthony	Willingham	anthony.willingham@electrifyamerica.com	Electrify America		1950 Opportunity Way Suite 1500 Reston VA, 20190 United States	Electronic Service		No	M-25-142
325	Danielle	Winner	danielle.winner@state.mn.us		Department of Commerce	85 7th Place East Suite 500 Saint Paul MN, 55101 United States	Electronic Service		No	M-25-142
326	Heidi	Winter	hwinter@co.murray.mn.us	Murray County		2500 28th Street PO Box 57 Slayton MN, 56172 United States	Electronic Service		No	M-25-142
327	Robyn	Woeste	robynwoeste@alliantenergy.com	Interstate Power and Light Company		200 First St SE Cedar Rapids IA, 52401 United States	Electronic Service		No	M-25-142
328	Terry	Wolf	terry.wolf@mrenergy.com	Missouri River Energy Services		3724 W Avera Dr PO Box Sioux Falls SD, 57109-8920 United States	Electronic Service		No	M-25-142
329	Curtis	Zaun	curtis@cpzlaw.com			3254 Rice Street Little Canada MN, 55126 United States	Electronic Service		No	M-25-142
330	Brian	Zavesky	brianz@mrenergy.com	Missouri River Energy Services		3724 West Avera Drive P.O. Box 88920 Sioux Falls SD, 57108-	Electronic Service		No	M-25-142

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						8920 United States				
331	Christopher	Zibart	czibart@atcllc.com	American Transmission Company LLC		W234 N2000 Ridgeview Pkwy Court Waukesha WI, 53188-1022 United States	Electronic Service		No	M-25-142
332	Kurt	Zimmerman	kwz@ibew160.org	Local Union #160, IBEW		2909 Anthony Ln St Anthony Village MN, 55418-3238 United States	Electronic Service		No	M-25-142
333	Emily	Ziring	eziring@stlouispark.org	City of St. Louis Park		5005 Minnetonka Blvd St. Louis Park MN, 55416 United States	Electronic Service		No	M-25-142
334	Ari	Zwick	ari.zwick@state.mn.us		Department of Commerce	85 7th Place East Suite 280 Saint Paul MN, 55101 United States	Electronic Service		No	M-25-142