



414 Nicollet Mall  
Minneapolis, MN 55401

February 1, 2023

—Via Electronic Filing—

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

RE: COMPLIANCE FILING  
XCEL ENERGY DEMAND RESPONSE COMPLIANCE  
DOCKET NOS. E002/M-20-421, E002/RP-19-368, E002/M-21-101 &  
E002/CI-17-401

Dear Mr. Seuffert:

Northern States Power Company, doing business as Xcel Energy, submits this Compliance Report to the Minnesota Public Utilities Commission. We submit this Report pursuant to the Commission's December 15, 2020 Order in Docket No. E002/M-20-421 requiring Xcel Energy to make an annual compliance filing providing the status of the Company's efforts to acquire 400 MW of additional demand response by 2023. Additionally, the Company reports on our Load Flexibility programs as required by the Commission's March 15, 2022 order in Docket No. E002/M-21-101.

We have electronically filed this document with the Minnesota Public Utilities Commission, and copies have been served on the parties on the attached service list. Please contact me at Jessica Peterson at [jessica.k.peterson@xcelenergy.com](mailto:jessica.k.peterson@xcelenergy.com) or Angela Smelser at [angela.r.smelser@xcelenergy.com](mailto:angela.r.smelser@xcelenergy.com) if you have any questions regarding this filing.

Sincerely,

/s/

JESSICA PETERSON  
MANAGER, STRATEGY AND PERFORMANCE

Enclosures  
c: Service List

STATE OF MINNESOTA  
BEFORE THE  
MINNESOTA PUBLIC UTILITIES COMMISSION

Katie J. Sieben  
Joseph Sullivan  
Valerie Means  
Matthew Schuerger  
John Tuma

Chair  
Commissioner  
Commissioner  
Commissioner  
Commissioner

IN THE MATTER OF AEMA'S PETITION  
REQUESTING A MISCELLANEOUS  
DOCKET TO DIRECT XCEL ENERGY TO  
IMPLEMENT 400 MW OF DEMAND  
RESPONSE BY 2023

DOCKET NOS. E002/M-20-421

2020-2034 UPPER MIDWEST INTEGRATED  
RESOURCE PLAN

DOCKET NOS. E002/RP-19-368

IN THE MATTER OF XCEL ENERGY'S  
PETITION FOR LOAD FLEXIBILITY PILOT  
PROGRAMS AND FINANCIAL INCENTIVE

DOCKET NOS. E002/M-21-101

IN THE MATTER OF A COMMISSION  
INVESTIGATION TO IDENTIFY  
PERFORMANCE, METRICS, AND  
OPERATIONS

DOCKET NOS. E002/CI-17-401

**ANNUAL REPORT**

## INTRODUCTION

Northern States Power Company, doing business as Xcel Energy, submits this Compliance Report to the Minnesota Public Utilities Commission. We submit this Report pursuant to the Commission's December 15, 2020<sup>1</sup> and March 15, 2022<sup>2</sup> orders. These orders require Xcel Energy to make an annual compliance filing

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<sup>1</sup> ORDER ESTABLISHING DEMAND RESPONSE COMPLIANCE DOCKET AND FILING REQUIREMENTS, Minnesota Public Utilities Commission, December 15, 2020, Docket No. E002/M-20-0421.

<sup>2</sup> ORDER APPROVING MODIFIED LOAD-FLEXIBILITY PILOTS AND DEMONSTRATION PROJECTS, AUTHORIZING DEFERRED ACCOUNTING, AND TAKING OTHER ACTION, Minnesota Public Utilities Commission, March 15, 2022, Docket No. E002/M-21-101 & E002/M-17-401.

providing the status of the Company's efforts to acquire no less than 400 MW of additional demand response by 2023<sup>3</sup> and continue to report on the Company's Load Flexibility programs.

The Company continues to be a leader in demand response efforts by offering additional program options to customers. In the past five years, customers have been able to choose from an additional seven demand response programs and pilots now offered by the Company. These programs plus our existing portfolio have allowed an additional 160,000 customers to participate in these efforts for capacity of approximately 345 MW.<sup>4</sup> With the ability to now begin piloting load flexibility options, shifting demand versus shedding demand, we look forward to continuing to work with customers to lower their energy costs by helping the Company manage our distribution of energy.

In total, the Company has 11 percent of its peak demand available for demand response control across its Northern States Power Company jurisdictions. This includes active enrollment of over 470,000 residential and small business customers and 23,000 commercial and industrial customers in demand response programs. Collectively, this represents total controllable load of 968 MW, a 117 MW net increase from the available total (851 MW) at the time of the Commission's Order.

Table 1 shows the Company's past and projected net peak coincident demand response additions under the Company's plan. These numbers include both the increased capacity through new programs as well as the loss of load through measurement and verification efforts or program attrition.<sup>5</sup>

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<sup>3</sup>See ORDER APPROVING PLAN WITH MODIFICATIONS AND ESTABLISHING REQUIREMENTS FOR FUTURE RESOURCE PLAN FILINGS, Minnesota Public Utilities Commission, Docket No. E002/RP-15-21, January 11, 2017, Order Point 10.

<sup>4</sup> This capacity is filed as part of our Minnesota CIP Status Reports from 2017-2021. 2022 is estimated as the Company continues to finalize the data for our 2022 Minnesota CIP Status Report. These reports can be found here: [https://www.xcelenergy.com/company/rates\\_and\\_regulations/filings/minnesota\\_demand-side\\_management](https://www.xcelenergy.com/company/rates_and_regulations/filings/minnesota_demand-side_management)

<sup>5</sup> Attrition includes the loss of a large customer for nearly 80 MW in 2021.

**Table 1: Xcel Energy Demand Response Portfolio (Gen. MW)  
January 2023 Estimates<sup>6,7</sup>**

	Actual						Forecast
	2017	2018	2019	2020	2021	2022	2023
<b>Total Peak-Coincident Controllable Load</b>	851	824	897	942	943	968	1276
<b>Incremental Controllable Load between 2017 baseline and year-end</b>	0	(27)	46	91	92	117	425

The Company is committed to achieving the Commission’s directive to add 400 MW of incremental demand response and has continued to adjust its plans to achieve these results. As the above table shows, with the exception of 2018, the Company’s demand response portfolio has grown consistently since the Commission directed the Company to procure additional resources—albeit at a slower pace that we had hoped as a result of capacity loss and attrition. As discussed in this filing, however, we believe that much of the “groundwork” has been laid for accelerated growth of our demand response resources, and that the challenges encountered by the COVID-19 pandemic have dissipated. We anticipate that 2023 will show robust growth in our new program offerings.

The remainder of our Compliance Filing provides general background for our demand response portfolio and responses to the Commissions Compliance Requirements.

## **I. BACKGROUND**

Xcel Energy has an extensive demand response portfolio developed and modified over the last 40 years. Beginning with interruptible rates in the early 1980’s the Company was at the forefront of adding new equipment and opportunities to reduce load during peak events. In fact, the Company was one of the first utilities in the nation to install direct control devices to air conditioning units in residential homes. This program, now called Saver’s Switch, has been available to residents since 1994, and has grown to over 60 percent of our total residential homes with air conditioning. The Company continues to have one of the largest residential programs for direct load control, second only to Florida Power and Light. This has been maintained by adjusting our program, updating equipment, modifying operational control, and

<sup>6</sup> The Company is interpreting the 400 MWs to be in Gen. MW, or reduction of NSP’s system peak.

<sup>7</sup> Per request of the Commission during the January 6, 2022 Hearing as part of Docket No. E002/M-21-101, the Company has also provided these details in Customer MW in Attachment B.

looking towards unconventional uses for direct load control – such as controlling during a distribution outage.

When smart thermostats entered the market, the Company acted to create partnerships with manufactures, each of which had their own systems and requirements, to find new opportunities to offer opt-in control. As a result, our AC Rewards program was developed. This provides customers the ability to choose whether they wanted to be actively involved in control events by opting into an event or passively participate by allowing a Saver's Switch device to cycle their air-conditioner automatically. We continue to adjust and monitor our AC Rewards program to take advantage of new manufacturing options and hope to see this program expand.

Beginning in 2015, California began to investigate new forms and methods of demand response that had nationwide impact as they investigated how demand response as a resource could change. Renewable energy's continued cost declines and policy benefits created new opportunities and challenges. Specifically, the intermittent nature of renewable generation provided further opportunity to explore how our customers could play a more responsive role in the use of energy during system peak. The Company began to review its interruptible rates, for commercial customers, and began to meet with individual customers to update contractual obligations and explain that winter control was likely in the future. The Commission's May 22, 2015 Order in Docket No. E002/M-15-189 allowed the Company to set aside rules requiring customers to remain on their contracts and provided an opportunity for them to right size their load control commitments. The interruptible program, Electric Rate Savings (ERS), often sees different load commitments throughout the years, but saw the most significant change as a result of this waiver where 78 customers cancelled their contractual obligations and over 300 submitted contractual obligations that were overdue for review in the light of these changes.<sup>8</sup>

Since the Commission's 2017 IRP Order requiring the Company to add additional demand response resources, the Company and electric industry have begun to focus on shifting load rather than shedding it at system peak. The Company's 2019 Upper Midwest Energy Plan foreshadowed the shift in traditional usage (peak demand reductions during summer load) to non-traditional usages that begins to shift load during different times of day impacted by new rate structures and new resources

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<sup>8</sup> Xcel Energy Compliance Filing, *In the Matter of the Petition of Northern States Power Company for Approval of a One-Time Cancellation Charge Waiver of the Company Tariff Requirements for Peak Control Services*, Docket No. E002/M-15-189, March 29, 2016. The Company allowed a similar reduction in load during the COVID Pandemic. Results of this change can be found in Docket No. E002/M-20-503.

across our jurisdictions.<sup>9</sup> Minnesota Statute §216B.241 recognizes this shift by adjusting Minnesota’s long standing Conservation Improvement Plan (CIP) to the Energy Conservation and Optimization Act as approved in 2021. This Act provides utilities the ability to incentivize and encourage customers to optimize their energy, rather than or in addition to reducing load. Further, it highlights the importance of demand response.<sup>10</sup>

Changing how customers receive and ultimately use energy is ongoing as the Company aggressively moves to achieve our vision to provide all customers with 100 percent carbon-free electricity by 2050. But making this shift for demand response will ultimately adjust our focus from demand reduction to demand shifting or demand management – which could alter what we use as emergency demand control and in the future possibly result in less demand response peak capacity reduction.

The Company began its efforts to obtain the additional demand response resources directed by the Commission in 2017 with two demand response programs: Electric Rate Savings (ERS) and Saver’s Switch. Since that time, the Company has significantly grown residential opportunities and most recently launched a program to manage electric vehicles. With the approval of its Load Flexibility proposals in 2022, the Company can now begin to test further opportunities for customers – giving them options for control rather than offering one solution that may not fit every business or industrial site. The Company is excited for what the future will bring but is cognizant that shifting a paradigm of control, that we began in 1980s, will take time. We believe we are up to the challenge and look forward to transforming the market.

## II. SUMMARY OF REQUIREMENTS

On April 14, 2020 the Advanced Energy Management Alliance (AEMA) filed a petition requesting a proceeding to expedite Xcel Energy’s implementation of 400 MW of incremental demand response. On December 15, 2020 the Commission issued its Order in this docket specifying that Xcel Energy shall make annual

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<sup>9</sup> Upper Midwest Integrated Resource Plan 2020-2034, Xcel Energy, Docket No. E002/RP-19-368, 2019. See Appendix G1.

<sup>10</sup> The Minnesota Public Utilities Commission has also recognized this environmental change as reflected through their orders in the Investigation to Identify Performance, Metrics and Operation (Docket No. E002/M-17-401), 2019 Upper Midwest Energy Plan (requiring further analysis on load shifting in Docket No. E002/RP-19-368), and approval of the Company’s load flexibility programs in Docket No. E002/M-21-101.

compliance filings beginning February 1, to include the following established in Ordering Point 2:

- a. the status of stakeholder meetings (if any);
- b. a list of expected product offerings and how they will address the relevant order points of the January 2017 IRP order;
- c. the status of product offering development;
- d. a date, or estimated date, of regulatory filing;
- e. demand response implementation status;
- f. demand response subscription level status and forecast;
- g. time-of-use and critical peak pricing product status or learnings from Advanced Metering Infrastructure pilots; and
- h. detail of its demand response programs that qualify for cost recovery through the Company's Conservation Improvement Plan (CIP).

Additionally, order Point 18 of the Commission's March 15, 2022 Order requires the Company to provide additional details regarding the Approved Load Flexibility Pilots. Specifically, in addition, to providing total spending and a narrative regarding the activities and achievements as part of research and development efforts, the Company is required to report the following:

- a. Total number of participants and equipment type
- b. Number of participants
- c. Reduction of load (Gen. kW, Gen. kWh) as a result of equipment installation
- d. Load Shifting (Number of participating customers, Available MW and MWh during time contingency events/or shifts to particular times of day. Verification data as available)

Further, order Point 19 of the Commission's March 15, 2022 Order requires the Company to report on the following details for its Peak Flex Credit program:

- a. Total expenditures
- b. Number of participants
- c. Number of participants opting for fast versus standard response time
- d. Number of participating opting for seasonal participation
- e. Potential demand reduction available (Gen. kW, Gen. kWh (where applicable)).
- f. Actual load relief during control events (as defined in Ordering Point 19).

The Report is organized consistent with the required topics in these ordering points.

### **III. DEMAND RESPONSE COMPLIANCE REQUIREMENTS**

#### **A. Status of Stakeholder Meetings**

The Company had several conversations with individual interested parties related to its proposed load flexibility pilots (Docket No. E002/M-21-101) and future implementation of these efforts in 2022.

#### **B. Progress Towards January 2017 IRP Order**

The Company has added an additional net 117 MW of demand response capacity, including losses, and anticipates a net increase of 425 MW by the end of 2023, depending on the success of several new recently launched programs and marketing opportunities described below. We further note that Company's gross demand response capacity is approximately 345 MW; it is with customer attrition and predicted savings adjustments (through measurement and verification) that we report a net 117 MW. In Attachment A, we provide a list of individual demand response programs and their historic and expected contributions to achieving the 400 MW requirement.

Consistent with prior reporting in this docket as well as with the consideration of generation assets in the resource planning process, in this filing the Company reports its progress toward achieving the required 400 MWs in units of peak-coincident MW at the generator. While some parties have questioned whether targeting 400 MW of generator-equivalent resources is the correct measurement, we continue to believe that it is. This is because our demand response programs offset generator production. As a result, measuring our demand response additions in terms of generator-equivalent resources aligns these additions with the traditional consideration of such resources in terms of reduction in the utility's resource planning and system peak. Additional discussion of the point of measurement of demand response programs is included in Attachment B. As we develop and implement new programs that shift and shape load, rather than only shaving peak load, we will consider whether if a different measurement would be more appropriate for those programs.

The Company's demand response portfolio is substantial; it is equivalent to approximately 11 percent of the Company's peak demand. In fact, according to *The Potential for Load Flexibility in Xcel Energy's Northern States Power Service Territory*, conducted by the Brattle Group in 2019, the Company's portfolio ranked in the eighth largest portfolio among all US investor-owned utilities when demand response capability is expressed as a percentage of peak demand. Additionally, the portfolio is



the largest in the Midcontinent Independent System Operator in terms of total megawatt capability in 2022/2023. Table 2 below shows how the Company’s demand response has grown as a percent of its overall demand since the Commission directed the Company to procure additional demand response resources.

**Table 2: Demand Response as a Percent of Demand**

	Actual					Forecast
	2018	2019	2020	2021	2022	2023
<b>NSP Peak Demand<sup>11</sup></b>	<b>9,152</b>	<b>9,084</b>	<b>9,099</b>	<b>9,079</b>	<b>9,095</b>	<b>9,140</b>
<b>Total Peak-Coincident Controllable Load</b>	<b>824</b>	<b>897</b>	<b>942</b>	<b>943</b>	<b>968</b>	<b>1,276</b>
<b>Percent of Represented demand response</b>	<b>9%</b>	<b>10%</b>	<b>10%</b>	<b>10%</b>	<b>11%</b>	<b>14%</b>

**B. List of expected product offerings and how they will address the relevant order points of the January 2017 IRP order;**

In Attachment A, we provide a list of individual demand response programs. Below, we provide the details regarding actions taken in 2022 to achieve the Commission’s directive. We also explain the challenges we have faced in trying to increase demand response capacity with our customers and how we intend to address the current gap between current capacity and the addition of 400 MW.

1. 2022 Actions

The Company took several steps to increase load in our demand response programs in 2022. These actions include adding five new programs and pilots, expanding existing programs, and making additional efforts to increase customer adoption. These efforts are explained further below.

a. *New Programs*

The Company moved forward with five programs and pilots directed at increasing its demand response portfolio. The Company received approval of three new pilots under our Load Flexibility Plan in Docket No. E002/M-21-101 and is moving

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<sup>11</sup> Rebuttal Testimony and Schedules John M. Goodenough, Application for Authority to Increase Electric Rates in Minnesota, Docket No. E002/GR-21-630, November 8, 2022.

forward with implementation. These programs include Optimize Your Charge, Thermal Energy Storage and Peak Flex Credit.

Additionally, two new programs/pilots were filed for approval under our Conservation Improvement Program. These include Critical Peak Pricing (CPP) and Behavioral Demand Response (BDR) which were approved under our Conservation Improvement Program on January 19, 2023 in Docket No. E,G002/M-20-473.<sup>12</sup>

Collectively, the Company expects these five new programs to provide significant additional demand response in 2023 and continue to grow in future years.

*b. Expansion of Existing Programs*

During 2022, the Company also took several steps to expand our demand response offerings including expanding our AC Rewards program and adjusting our ability to control Saver's Switch more during an event. First, the Company expanded the AC Rewards program by entering a partnership with a new thermostat manufacturer. Specifically, customers with existing or new Nest devices can now participate in our AC Rewards program. As noted below in "Implementation Status" this expansion resulted in a significant increase in capacity for the program. Plus, we continue to expand our AC Rewards for Business to small and mid-sized businesses that are interested in utilizing a smart thermostat to control their load during called events.

Second, we received Commission approval to adjust our Saver's Switch tariff to increase the demand response capacity from the program by lengthening the potential control cycles. Specifically, we can now cycle participating air conditioners up to 60 percent off during control events, rather than the previous maximum of 50 percent off. This not only allows for further load control but provides the ability to control differently depending upon localized need.

*c. Customer Focused Activities*

The Company also adopted several new marketing approaches in 2022 to increase its demand response capacity. First, we began to provide customers with marketing materials that compare different available demand response programs to simplify the decision-making process. For instance, we provide materials that explain the details of both AC Rewards and Saver's Switch programs to compare which program best meets a customer's particular need. We believe that simplifying decisions for

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<sup>12</sup> CPP is also part of the Company's General Service Pilot for Three Part TOU and Critical Peak Pricing filing in Docket No.E002/M-20-86 and has received verbal approval by the Commission.

customers and providing readily accessible information will allow us to foster higher participation and increase benefits.

With all the recent additions to the demand response portfolio, we have begun to initiate targeted customer meetings with our commercial and industrial customers to identify the program that would benefit them the most. Our intention is that focusing on a more targeted and customized approach for potential customers can generate more demand response interest and enrollments to better balance our system in times of need.

Further, we have renewed our past practice of offering direct installation of smart thermostats and other equipment. This dovetails with a practice that we began in late 2021, in which we offered smart thermostats through our Xcel Energy Store<sup>13</sup>—to optimize the customer experience by combining our energy efficiency and demand response objectives by lowering the cost of the thermostat to customers and enabling the option to automatically enroll them into the demand response program. We believe offering installations of these products will reduce the concern customers may have around installing the equipment and thereby increase participation. Our home installation option was not available in 2020 and 2021 because of the COVID Pandemic. We have also offered promotional pricing around events such as Earth Day and Black Friday.

Finally, our Peak Partner Rewards program began to offer additional bonus rebates for initial reservation of further controllable load. In partnership with our other CIP programs we have begun to focus on identified non-participants to provide them additional information regarding the programs and pilots offered for demand response.

## 2. Continued Challenges

While the Company has taken many steps to increase its demand response programs and capacity, it has admittedly faced many challenges that have slowed progress. First, the COVID-19 pandemic disrupted customer and Company plans and slowed the growth of demand response acquisition for several years. Simply put, the pandemic shifted priorities for nearly all customers, with many businesses forced to focus on only those matters they viewed as essential for their survival. This limited our ability to execute contracts with these businesses or otherwise promote our demand response programs. In addition, many “non-essential” capital expenditures were paused, meaning that new loads (such as planned expansions) were delayed. The

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<sup>13</sup> <https://www.poweredbyefi.org/xcelenergymn>

result was that load additions that would have provided additional demand response capacity did not materialize. In addition, the Company's efforts to encourage customers to enroll in programs were met with an understandable desire to defer such conversations until business conditions stabilized. These conditions are slowly changing, and we expect demand response growth to accelerate in 2023.

Second, the Company has faced supply chain disruptions that have limited our ability to fully deploy our programs over the past few years. As one example, water heater control modules needed by the Smart Water Heating offering have had limited availability from the supplier. This has resulted in orders for equipment being only partially filled by suppliers or being subject to months-long delays for equipment to become available. This has slowed the growth of our programs because demand response capacity is not considered to be an available resource until control equipment is installed. In addition to water heater control modules, the Company has experienced difficulty obtaining equipment that requires specific computer chips including those that are used for our switches for our Saver's Switch program and meters necessary to participate in ERS and Peak Partner Rewards (PPR).

Third, the controllable load that the Company can rely on continues to be volatile. This is a result of several factors: (1) customer adjustments to contracted load; (2) Company reductions of contracted load based on previous non-compliance (not meeting contractual requirements); and (3) maintaining accurate measurement and verification. Some customers were prompted by the pandemic (or other business factors) to cancel their participation – or in some unfortunate cases, went out of business – resulting losses of controllable load from 2021-2022 that offset gains in other programs. This was a serious setback to the Company's progress toward adding incremental demand response. Further, the Company continues to be committed to our measurement and verification policies. These reviews can result in the reduction of controllable load as we refine available load with actual verified results.<sup>14</sup>

### 3. Reducing the Gap

Despite the challenges explained above, the Company is committed to achieving 400 MW of additional demand response capacity in 2023 while continuing to grow its demand response portfolio into the future. We have had to re-evaluate and regroup several times to address the challenges noted above but are excited about going to

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<sup>14</sup> For example, a significant adjustment to the kW savings for Saver's Switch impacted our 2018 growth resulting in a reduction in total including additions plus the loss of partial savings per switch.

2023 with a full set of programs that meet customer needs. To reduce the current gap several initiatives, have or will launch in 2023, including:

- Launching focused customer campaigns along with our energy efficiency product (CIP) marketing;
- Offering additional incentives/sign-up bonuses to increase non-participant participation;
- Focusing on additional operational efficiency that will benefit the future of our programs;
- Adding additional engineering resources to help provide specific technical details to commercial and industrial customers on the fence about demand response;
- Expanding training opportunities for internal staff regarding demand response opportunities and options to provide customers to reduce energy bills;
- Increasing direct installs of smart thermostats in partnership with our Home Energy Audit program;
- Expanding partnerships with additional vendors/manufacturers.

These efforts are in addition to the launch of five new programs discussed above including the three load flexibility programs, behavioral demand response, and Critical Peak Pricing.

### **C. Status of Product Offering Development**

Over the past few years, the Company launched several new programs for customers including Peak Partner Rewards (2020),<sup>15</sup> and AC Rewards for Business (2020),<sup>16</sup> Behavioral Demand Response (2023),<sup>17</sup> and our Load Flexibility pilots (2022) including Electric Vehicle Optimization, Peak Flex Credit, and Thermal Storage. The Load Flexibility Pilots were originally filed to launch in 2021, however, these programs were not approved until September of 2022. This resulted in a later launch than anticipated. All three were launched by December of 2022.

In our 2021-2023 Minnesota CIP Triennial Plan, we also included additional growth of existing programs and expanded our efforts to control water heaters. Through our

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<sup>15</sup> *Decision In the Matter of Xcel Energy's 2017-2019 Electric and Natural Gas CIP Plan*, Department of Commerce, Docket No. E,G002/CIP-16-115, November 26, 2019.

<sup>16</sup> *Decision In the Matter of Xcel Energy's Program Modification Request Filed December 23, 2019*, Department of Commerce, Docket No. E,G002/CIP-16-115, February 21, 2020.

<sup>17</sup> *Decision In the Matter of Xcel Energy's Program Modification Request Filed October 28, 2022*, Department of Commerce, Docket No. E,G002/CIP-20-473.

CIP Smart Water Heating Program (part of the Residential Demand Response offering), a water heater can be scheduled (during off peak times) to overheat the water, allowing the Company to reduce the water heater’s expected contribution to system peak demands. This program launched in 2021, but as noted above, experienced some difficulty enrolling participants due to supply chain disruptions limiting available control equipment.

Table 3 provides an update on active product development efforts. As shown, there are several products that were recently approved. The only products that remain on our active list for 2023 launch include Critical Peak Pricing, which was approved by the Department of Commerce as a CIP product (as noted above) and received verbal approval by the Commission on January 5, 2023, and Peak Day Partners which the Company is still evaluating as an option.

**Table 3: Updated Summary of Xcel Energy Demand Response Offerings in Development**

<b>Program Type</b>	<b>Product</b>	<b>Est. Date</b>	<b>Status</b>
Behavioral DR	“Hands-off” DR	Launched in MN	
Critical Peak Pricing	Critical Peak Pricing (Opt-in)	2023	Pilot verbally approved in Docket Nos. E002/M-20-86 and approved as a CIP pilot in E,G002/CIP-20-473.
Electric Vehicles	EV Static Optimization Pilots - Optimize Your Charge (OYC)	Launched in MN	New pilot for residential and commercial EVs in MN. Currently enrolling customers.
Interruptible Offerings	Peak Partner Rewards (PPR)	Launched in MN	
Interruptible Offerings	Peak Flex Credit	Launched in MN	Currently enrolling customers.
Interruptible Offerings	Peak Day Partners	2023	New Product – Currently offered in CO.
Commercial Thermal Storage	Load shifting of space cooling and refrigeration loads	Launched in MN	Currently enrolling customers.

**D. Date, or Estimated Date, of Regulatory Filings**

Approvals for new programs, program changes, and pilots are addressed through docketed filings. We include current filings impacting our demand response program over the last year and into 2023. This is not an exhaustive list as other regulatory filings may be considered as we reach for deeper demand response across the Northern States Power system.

**Table 4: Regulatory Filings**

<b>Docket</b>	<b>Timing</b>	<b>Notes</b>
Docket No. E002/M-20-86	Q1 2023	General Service Pilot for Three Part TOU and Critical Peak Pricing
TBD	Q2 2023	The Company is working to introduce its Peak Day Partners program (currently operating in Colorado) in Minnesota and will file requests for approval with the Department and/or Commission after final analysis.
TBD	June 1, 2023	Minnesota Energy Conservation and Optimization Triennial Plan

**E. Demand Response Implementation Status**

Below we provide an update on new programs launched or modified beginning in 2020 and an update regarding our new load flexibility plan.

*AC Rewards Business* - AC Rewards for Business launched in Q2 of 2020. Today, roughly 2,400 devices are enrolled, equaling 5.3 MW of demand relief. Our direct install options were delayed as a result of the coronavirus pandemic in 2020 and early 2021 but installations resumed in full during 2022 and saw steady and strong participation. Through increased customer interest, continued vendor partnerships and strong marketing and recruitment efforts, we believe the program will continue to grow.

*AC Rewards for Residence* – The AC Rewards program was launched in both South Dakota and Wisconsin beginning in 2020. There are currently 844 enrollments in South Dakota equaling 0.98 MW in demand relief and 1,410 enrollments in Wisconsin totaling 1.70 MW. We anticipate seeing increased customer interest in these programs, as well as our Minnesota offering, because of simplifying the enrollment process, implementing a new storefront with options for customers to purchase pre-enrolled devices, and most recently (2022) adding additional eligible device options. Adding additional device options has proven to be highly effective for increasing demand response opportunities. In 2022, the MN program saw an increase of 45 percent adding 11.2 MW to the portfolio. Through continued partnerships with our vendors and thermostat manufacturers as well as ongoing marketing efforts, we believe this program will remain a strong offering as part of our demand response portfolio.

*Peak Partner Rewards* - Peak Partner Rewards (PPR) had a soft launch in March of 2020 during the pandemic. Despite non-ideal conditions, 34 additional sites were added for 9 MW in demand response by the end of 2022. While this level of demand response is less than what we had anticipated there has been promising engagement from our internal sales teams with several customers who are currently assessing the benefits of the PPR program and their ability to participate.

*Smart Water Heaters* – The Smart Water Heater product was launched in 2021 as part of our Residential Demand Response program.<sup>18</sup> Unfortunately, suppliers of communications modules needed for this program have been unable to ship meaningful amounts of equipment. Without sufficient equipment, we have been unable to recruit HVAC contractors and deploy the program. This has been a continued challenge since 2021. As a result, the program has not yet been implemented.

*Peak Flex Credit Rider Pilot* – This Pilot was approved by the Commission in 2022 and will study a dispatchable, load-shedding program for commercial customers that provides additional flexibility and optionality to customers who want to design program parameters to work within their operational and business needs. This pilot provides pricing for both peak control events as well as buy-through options for economic control events. In approving this pilot, the Commission required the Company to create a second tranche of participation dedicated to testing the ability of aggregators to provide retail demand response in Minnesota using the Peak Flex Credit product design. The program was recently launched in November of 2022.

*Dynamic Thermal Storage Pilot* – The pilot, renamed from Commercial Thermal Storage, will study incentives provided to commercial customers for the installation and operation of thermal storage solutions, as well as ongoing credits for the associated daily load shifting. The program was recently launched in December of 2022.

*EV Optimization Pilot* – The Static Optimization Pilot known as Optimize Your Charge will study the management of grid impacts of residential and commercial electric vehicles by working with EV customers to provide scheduled charging options for their daily EV charging. The two residential and two commercial charging options encourage EV charging outside the Company's system peak, and these options are designed to stagger charging times to avoid demand spikes during the off-peak period. The pilot was recently launched in December of 2022 after the Company was able to develop the technology to enroll EV customers and track their charging data.

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<sup>18</sup> This program is part of the Residential Demand Response line in Attachment A.



## **F. Demand Response Subscription Level Status and Forecast**

The Company provides the forecast and demand level in Attachment A.

## **G. Time-of-Use and Critical Peak Pricing Product Status or Learnings from Advanced Metering Infrastructure**

The Company has recently completed a pilot studying a time-of-use (TOU) rate for residential customers, called flex pricing. In addition, the Company this year will be launching a General TOU Service Pilot where we will test out two new rate designs for commercial and industrial customers. While neither of these pilots are relying on the full capabilities of the AMI system, the pilots are intended to study and inform permanent rate designs in the future. Likely and permanent proposals would integrate AMI capabilities into the implementation and operations of the future rates. Below we discuss more details of each pilot. In addition, we also discuss various offerings for EV charging that also offer TOU rates to incentivize charging off-peak.

### **1. Flex Pricing**

The Company launched in November 2020 a residential TOU rate pilot called Flex Pricing.<sup>19</sup> As a part of the pilot, about 17,000 customers in two sections of the Twin Cities metro area received advanced meters. About 9,000 of those customers are taking service on the pilot TOU rate, while the remaining customers stayed on their standard residential rate as a control group. As a part of the pilot the Company has been studying the effects of TOU rate price signals on the energy use behavior of customers. The pilot concluded in November 2022.

The Company submitted a mid-pilot progress report in February 2022 highlighting results through one year of pilot operations. Through the first year, we saw a modest demand savings during on-peak periods, a decrease of about 1 percent. In addition, we saw a 2 percent coincident peak reduction corresponding with the hour the Company experienced our maximum annual system load. We also saw in initial results that customers were becoming more responsive to the rate's price signals as the pilot went on. Overall, with the small number of participating customers and modest demand savings experienced, we have not generated enough demand response to claim as a part of this filing. The Company will be filing a final evaluation of the Flex

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<sup>19</sup> *In the Matter of Xcel's Residential Time of Use Rate Design Pilot Program*, Docket No. E002/M-17-775, ORDER APPROVING PILOT PROGRAM, SETTING REPORTING REQUIREMENTS, AND DENYING CERTIFICATION REQUEST (August 7, 2018).

Pricing pilot in February 2023 which will highlight results through the full term of the pilot.

## 2. General Time of Use Service Pilot Program

The Company has received Commission approval in Docket No. E002/M-20-86 to pilot two separate rate designs for commercial and industrial customers. The first pilot rate is a General TOU Service rate design, which includes a new three-period energy rate, system demand rates, and distribution demand rates. The second pilot rate is a Critical Peak Pricing rate, which includes a three-period volumetric energy rate with a critical peak pricing component and distribution demand rates (but no system demand rates).<sup>20</sup>

We expect the pilot to launch later this year. The Commission recently verbally approved the rate designs, tariffs, and recruitment plan for the pilots, but required the Company to submit an additional Compliance Filing by March 31, 2023.<sup>21</sup> This Compliance Filing will include additional implementation details for the pilot. Once launched it will be conducted for a period of two years. We continue to evaluate the potential load reduction resulting from rates such as Critical Peak Pricing and as further analysis is conducted regarding the pilot scope, we will be able to begin to make estimations.

## 3. Electric Vehicle Charging

The Company also has several offerings for customers that incentivize changes in electric vehicle (EV) charging behaviors through time varying rates. The Company has offered the Residential EV Charging Service tariff since 2015 which enables customers to isolate energy usage associated with EV charging through a second meter to take advantage of time-of-day rates.

In addition, we also offer the EV Accelerate at Home program for our residential customers.<sup>22</sup> Under this program the Company installs and maintains charging equipment at customer homes that can monitor EV charging without the need for a second meter.

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<sup>20</sup> General Time-of-use Service Tariff, Docket No. E002/M-20-86, Compliance Filing-Pilot Programs, Xcel Energy (January 18, 2022).

<sup>21</sup> Verbally approved during the Commission's January 5, 2023 Agenda Meeting

<sup>22</sup> *In the Matter of Xcel Energy's Petition for Approval of an Electric Vehicle Home Service Program*, Docket No. E002/M-19-559, ORDER APPROVING ELECTRIC VEHICLE HOME SERVICE AND VOLUNTARY ELECTRIC VEHICLE CHARGER SERVICE PROGRAMS AS MODIFIED (October 6, 2020).

We also are currently operating a Residential EV Subscription Service Pilot program, which was launched in March 2020.<sup>23</sup> Under this program, residential EV drivers are permitted to charge their vehicles off-peak for a flat monthly fee. The program gives customers the option to pay for the cost of charging and related equipment as a part of the monthly fee as well. Customers incur additional energy charges for charging that takes places outside of the off-peak period. Participation in the pilot is capped at 150 participants. The pilot will last for a term of three years.

Further, we offer a program to facilitate EV-charging at multi-dwelling unit sites (apartments, condos, etc.) that includes TOU rates as a default rate option.<sup>24</sup> The pilot launched in December of 2021 and uses the residential TOU rates in use for the Flex Pricing pilot.

In August 2022, the Company submitted a proposal to build-out a large public fast charging network in our service territory, along with changes to our EV Accelerate at Home, Residential EV Subscription Service Pilot, and our Multi-Dwelling Unit Charging Pilot and other existing EV programs and pilots.<sup>25</sup> As with our other EV programs, the public fast charging network will use a time-varying rate to incentivize users to plan charging during off-peak hours. This proposal is proceeding as a contested case. The Company submitted direct testimony in the case on December 19, 2022 and intervenors will submit testimony on February 7, 2023. The Administrative Law Judge for the contested case will submit their report by July 3, 2023.

We report on customer participation and the monthly average percentage of off-peak charging for all EV programs in our Annual EV Report.<sup>26</sup>

#### **H. Details of demand response programs that qualified for cost recovery through the Company's Conservation Improvement Plan (CIP)**

All of our demand response programs are also part of our CIP portfolio. These focused on the summer load shedding resources provided for interruptible load in programs such as our Electric Rate Savings program (commercial, dispatchable load)

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<sup>23</sup> *In the Matter of Xcel Energy's Petition for Approval of a Residential EV Subscription Service Pilot Program*, Docket No. E002/M-19-186, ORDER APPROVING PILOT WITH MODIFICATIONS, AND SETTING REPORTING REQUIREMENTS (October 7, 2019).

<sup>24</sup> *In the Matter of Xcel Energy's Petition for Approval of a Multi-Dwelling Unit Electric Vehicle Pilot Program*, Docket No. E002/M-20-711, ORDER APPROVING PILOT PROGRAM WITH MODIFICATIONS (July 2, 2021)

<sup>25</sup> *In the Matter of the Petition of Northern States Power Company for Approval of a Public Charging Network, an Electric School Bus Pilot, and Program Modifications*, Docket No. E002/M-22-432

<sup>26</sup> Annual Reports submitted annually on June 1 in Docket No. E002/M-15-111

and Saver’s Switch program (residential, dispatchable load). More recently, we have begun to launch additional programs such as AC Rewards (smart thermostats) and Peak Partner Rewards (monthly dispatchable load). Specific details as related to our CIP programs can be found in our most recent Minnesota Conservation Improvement Program 2021-2023 Triennial in Docket No. E,G002/CIP-20-0473. Cost Recovery through CIP is allowed by Minnesota Statute § 216B.241.

#### IV. LOAD FLEXIBILITY PILOT COMPLIANCE

The Commission’s March 15, 2022 Order requires the Company as part of Ordering Point 18 to provide additional details regarding the Approval of the Load Flexibility Pilots. We provide more detail in this section regarding these details.

##### A. Spending

The Company provides details regarding our budget and actual spend for pilot administration and incentives. There was minimal spend in 2022 as a result of the timing of approvals and implementation. Further, we acknowledge that final spending has not yet been finalized as of the date of this filing; therefore, we have estimated these amounts and will update final spend for 2022 in a future compliance filing.

**Table 5: 2022 Estimated Forecast/Action Spending**

	Forecast	Actual
<b>Load Flexibility Tracker Account</b>	<b>\$ 1,030,215</b>	<b>\$ 0</b>
<b>Bill Credits &amp; Study Fees</b>	\$ 919,700	\$ 0
<b>Customer Services (Equipment Cost)</b>	\$ 110,515	\$ 0
<b>Non-Approved Spending</b>	<b>\$ 499,816</b>	<b>\$ 98,049</b>
<b>Program Administration</b>	\$ 37,619	\$ 0
<b>Incremental Labor</b>	\$ 406,687	\$ 98,049
<b>Advertising &amp; Promotions</b>	\$ 35,511	\$ 0
<b>Measurement and Verification</b>	\$ 20,000	\$ 0
<b>Product Development &amp; Research</b>	\$ 0	\$ 0
<b>Total</b>	<b>\$ 1,530,031</b>	<b>\$ 98,049</b>

## B. Research and Development Efforts

Development of the Excess Supply Partners (ESP) research pilot was approved in the Load Flexibility Filing and is expected to launch to customers in early 2023. The Company plans to test the ESP concept in multiple states and will be launching in other states alongside the Minnesota launch.

## C. Program Details

The Commission Order requires the Company to provide summary details of the program. Since all three pilots, EV Optimize Your Charge, Peak Flex Credit and Thermal Energy Storage were launched in quarter four of 2022 there is minimal data to provide at this time. We provide what data is available in Table 6 below and note that Load Shifting details will be available once events are held in 2023. Additionally, no verification or analysis of program impacts or lessons learned are available at this time.

**Table 6: 2022 Program Details**

Program	Number of Participants	Equipment Type	Reduction of Load	
			Gen. kW	Gen. kWh
EV Optimize Your Charge (Static Optimization for Residential)	68	ChargePoint, Enel X	N/A	N/A
EV Optimize Your Charge (Static Optimization for Commercial)	0	ChargePoint, Enel X	N/A	N/A
Peak Flex Credit	N/A	N/A	N/A	N/A
Peak Flex Credit – Third Party	N/A	N/A	N/A	N/A
Thermal Energy Storage	N/A	N/A	N/A	N/A

The EV Optimize Your Charge pilot also uses a non-equipment type option called WeaveGrid API (Application Programming Interface) to track charging data directly from EVs. Additionally, we note that the 68 participants were enrolled in 2022 within a two-week period of launching these efforts in the middle of December.

## D. Peak Flex Credit Details

The Peak Flex Credit program officially launched in December of 2022 after its final approval by the Commission in September. Between September and December, the Company finalized software tools, tested billing scenarios and finalized program

materials<sup>27</sup> for both the Peak Flex Credit and the Peak Flex Credit for Aggregators in order to launch both tranches simultaneously.

While there was no participation in 2022, we are happy to announce that the first three contracts were signed by customers in early 2023 and we believe that we are close to reaching a final agreement with the one aggregator who has submitted its completed application.

We provide total expenditures below in Table 7.

**Table 7: Peak Flex Credit Total Expenditures  
(Including both tranches)**

	Forecast	Actual
<b>Deferred Spending</b>	<b>\$ 836,640</b>	<b>\$ 0</b>
<b>Bill Credits &amp; Study Fees</b>	\$ 789,340	\$ 0
<b>Customer Services (Equipment Cost)</b>	\$ 47,300	\$ 0
<b>O&amp;M Spending</b>	<b>\$ 276,076</b>	<b>\$ 71,830</b>
<b>Program Administration</b>	\$ 26,815	\$ 0
<b>Incremental Labor</b>	\$ 249,261	<b>\$ 71,830</b>
<b>Advertising &amp; Promotions</b>	\$ 13,929	\$ 0
<b>Total</b>	<b>\$ 1,112,716</b>	<b>\$ 71,830</b>

## CONCLUSION

We appreciate the opportunity to report on the progress towards incremental growth in its Demand Response portfolio. The Company will continue to report progress as our efforts expand.

Dated: February 1, 2023

Northern States Power Company

<sup>27</sup> <https://mn.my.xcelenergy.com/s/business/rate-plans/peak-flex-credit>

## ATTACHMENT A – ACTION PLAN

								<b>Estimated Cumulative Potential Gen. MW</b>	
	<b>Program</b>	<b>2017</b>	<b>2018</b>	<b>2019</b>	<b>2020</b>	<b>2021</b>	<b>2022</b>	<b>2023</b>	<b>2024</b>
<b>Active Programs (including new programs in 2020 and 2021)</b>	Electric Rate Savings	503	433	437	495	491	425	506	506
	Residential Demand Response (Including Saver's Switch and AC Rewards)	348	391	460	360	361	432	445	452
	Commercial Demand Response (including Saver's Switch and AC Rewards)				84	81	101	106	111
	Peak Partner Rewards	0	0	0	3	10	10	54	90
	<b>Subtotal Existing</b>	<b>851</b>	<b>824</b>	<b>897</b>	<b>942</b>	<b>943</b>	<b>968</b>	<b>1,111</b>	<b>1,159</b>
<b>Load Flexibility Pilots</b>	Peak Flex Credit (Tranche 1)						0	26	43
	Peak Flex Credit (Tranche 2)						0	26	43
	Commercial Thermal Storage						0	2	3
	Static EV Optimization						0	1	1
	<b>Subtotal New</b>						<b>0</b>	<b>55</b>	<b>90</b>
<b>Other Programs in Development</b>	Peak Day Partners						0	20	23
	Critical Peak Pricing						0	20	20
	Flex Pricing						0	0	0
	Behavioral Demand Response						0	50	60
	Third-Party Services						0	20	20
	<b>Subtotal Other</b>						<b>0</b>	<b>110</b>	<b>123</b>
<b>Total</b>	<b>Total Gen. MW</b>	<b>851</b>	<b>824</b>	<b>897</b>	<b>942</b>	<b>943</b>	<b>968</b>	<b>1,276</b>	<b>1,372</b>
	<b>Incremental Gen. MWs</b>	<b>0</b>	<b>-27</b>	<b>46</b>	<b>91</b>	<b>92</b>	<b>117</b>	<b>425</b>	<b>521</b>

## ATTACHMENT B – MEASURING DEMAND RESPONSE

When customers enroll in a demand response program, their commitment is in “customer MW” or “nameplate MW” and this is generally the basis for any credits or incentives paid to the customer. However, for system operating and planning purposes, the impact at the generator during the system peak is more important, and is affected by line losses, peak coincidence of the customer’s load, and potentially other factors. The Company applies a loss factor (which incorporates estimates for all of these factors) to the customer’s nameplate commitment in order to determine the estimated savings at the generator. This loss factor can vary from one year to another (and from one part of the distribution system to another), because losses are affected by weather, overall system load, materials used in the distribution system and a variety of other factors.

Consistent with prior reporting in this docket as well as with the consideration of generation assets in the resource planning process, in this filing the Company has reported its progress toward achieving the required 400 MWs in units of peak-coincident MW at the generator. This aligns with the traditional consideration of such resources in terms of reduction in the utility’s system peak. However, the Company recognizes that some stakeholders are also interested in understanding the demand response resource in terms of MW at the customer meter. Accordingly, the Company provides Table B.1 below, showing both generator and customer MW. Table B.1 is provided for informational purposes; the Company continues to believe that compliance with the 400 MW requirement should be measured at the generator for consistency with the resource planning process.<sup>1</sup>

We also note that demand response is not an invariable resource like other components of our resource mix, including other customer-focused programs like energy efficiency. When a customer replaces a piece of equipment with one that is more energy efficient, the impact on load is permanent. In comparison, when a customer chooses to enroll in a demand response program, they can and do change their level of enrollment based on their operational needs. Thus, the load reduction capacity individual customers provide may, and in some cases likely will, fluctuate year to year. These fluctuations affect both customer and generator MW and are among

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<sup>1</sup> The Resource Planning process includes both installed generation capacity, such as Generator MW, and the amount of accredited capacity within MISO (UCAP).



the reasons that tracking and reporting for demand response can be more complicated than for some other customer programs.

**Table B.1: Xcel Energy Demand Response Portfolio  
 January 2023 Estimates<sup>2</sup>**

	Actual						Forecast
	2017	2018	2019	2020	2021	2022	2023
<b>Total Peak-Coincident Controllable Load</b>							
Customer MW	777	675	837	863	862	874	1,156
Generator MW	851	824	897	942	943	968	1,276
<b>Incremental Peak-Coincident Controllable Load (since 2017)</b>							
Customer MW	0	-102	60	86	85	97	379
Generator MW	0	-27	46	91	92	117	425

<sup>2</sup> All figures represent controllable load as of the end of the year indicated.

CERTIFICATE OF SERVICE

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

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

xx by electronic filing.

Docket Nos.: E002/M-20-421, E002?RP-19-368, E002/M-21-101, & E002/CI-17-401

Dated this 1<sup>st</sup> day of February 2023.

/s/

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Christine Schwartz  
Regulatory Administrator

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Stacy	Miller	stacy.miller@minneapolismn.gov	City of Minneapolis	350 S. 5th Street Room M 301 Minneapolis, MN 55415	Electronic Service	No	OFF_SL_20-421_20-421
David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St  Duluth, MN 558022093	Electronic Service	No	OFF_SL_20-421_20-421
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Alan	Muller	alan@greendel.org	Energy & Environmental Consulting	1110 West Avenue  Red Wing, MN 55066	Electronic Service	No	OFF_SL_20-421_20-421
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J	Newberger	jnewberger1@yahoo.com	State Rep	14225 Balsam Blvd  Becker, MN 55308	Electronic Service	No	OFF_SL_20-421_20-421
David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency	220 South Sixth Street Suite 1300 Minneapolis, Minnesota 55402	Electronic Service	No	OFF_SL_20-421_20-421
M. William	O'Brien	bobrien@mojlaw.com	Miller O'Brien Jensen, P.A.	120 S 6th St Ste 2400  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-421_20-421



First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Carol A.	Overland	overland@legalelectric.org	Legalelectric - Overland Law Office	1110 West Avenue  Red Wing, MN 55066	Electronic Service	No	OFF_SL_20-421_20-421
Jessica	Palmer Denig	jessica.palmer-Denig@state.mn.us	Office of Administrative Hearings	600 Robert St N PO Box 64620 St. Paul, MN 55164	Electronic Service	No	OFF_SL_20-421_20-421
J. Gregory	Porter	greg.porter@nngco.com	Northern Natural Gas Company	1111 South 103rd St  Omaha, NE 68124	Electronic Service	No	OFF_SL_20-421_20-421
Greg	Pruszinske	gpruszinske@ci.becker.mn.us	City of Becker	PO Box 250 12060 Sherburne Ave Becker, MN 55308	Electronic Service	No	OFF_SL_20-421_20-421
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_20-421_20-421
Kevin	Reuther	kreuther@mncenter.org	MN Center for Environmental Advocacy	26 E Exchange St, Ste 206  St. Paul, MN 551011667	Electronic Service	No	OFF_SL_20-421_20-421
Richard	Savelkoul	rsavelkoul@martinsquires.com	Martin & Squires, P.A.	332 Minnesota Street Ste W2750  St. Paul, MN 55101	Electronic Service	No	OFF_SL_20-421_20-421
Jacob J.	Schlesinger	jschlesinger@keyesfox.com	Keyes & Fox LLP	1580 Lincoln St Ste 880  Denver, CO 80203	Electronic Service	No	OFF_SL_20-421_20-421
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates	7400 Lyndale Ave S Ste 190  Richfield, MN 55423	Electronic Service	No	OFF_SL_20-421_20-421
Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.	76 W Kellogg Blvd  St. Paul, MN 55102	Electronic Service	No	OFF_SL_20-421_20-421
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Byron E.	Starns	byron.starns@stinson.com	STINSON LLP	50 S 6th St Ste 2600  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-421_20-421
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Brenda	Kyle	bkyle@stpaulchamber.com	St. Paul Area Chamber of Commerce	401 N Robert Street Suite 150 St Paul, MN 55101	Electronic Service	No	OFF_SL_19-368_19-368_Official
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Stacy	Miller	stacy.miller@minneapolisn.gov	City of Minneapolis	350 S. 5th Street Room M 301 Minneapolis, MN 55415	Electronic Service	No	OFF_SL_19-368_19-368_Official
David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022093	Electronic Service	No	OFF_SL_19-368_19-368_Official
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Alan	Muller	alan@greendel.org	Energy & Environmental Consulting	1110 West Avenue Red Wing, MN 55066	Electronic Service	No	OFF_SL_19-368_19-368_Official
Carl	Nelson	cnelson@mncee.org	Center for Energy and Environment	212 3rd Ave N Ste 560 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_19-368_19-368_Official
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Carol A.	Overland	overland@legalectric.org	Legalelectric - Overland Law Office	1110 West Avenue  Red Wing, MN 55066	Electronic Service	No	OFF_SL_19-368_19-368_Official
Jessica	Palmer Denig	jessica.palmer-Denig@state.mn.us	Office of Administrative Hearings	600 Robert St N PO Box 64620 St. Paul, MN 55164	Electronic Service	No	OFF_SL_19-368_19-368_Official
J. Gregory	Porter	greg.porter@nngco.com	Northern Natural Gas Company	1111 South 103rd St  Omaha, NE 68124	Electronic Service	No	OFF_SL_19-368_19-368_Official
Greg	Pruszinske	gpruszinske@ci.becker.mn.us	City of Becker	PO Box 250 12060 Sherburne Ave Becker, MN 55308	Electronic Service	No	OFF_SL_19-368_19-368_Official
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_19-368_19-368_Official
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Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates	7400 Lyndale Ave S Ste 190  Richfield, MN 55423	Electronic Service	Yes	OFF_SL_19-368_19-368_Official
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Eric	Swanson	eswanson@winthrop.com	Winthrop & Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_19-368_19-368_Official
Lisa	Veith	lisa.veith@ci.stpaul.mn.us	City of St. Paul	400 City Hall and Courthouse 15 West Kellogg Blvd. St. Paul, MN 55102	Electronic Service	No	OFF_SL_19-368_19-368_Official
Julie	Voeck	julie.voeck@nee.com	NextEra Energy Resources, LLC	700 Universe Blvd  Juno Beach, FL 33408	Electronic Service	No	OFF_SL_19-368_19-368_Official
Samantha	Williams	swilliams@nrdc.org	Natural Resources Defense Council	20 N. Wacker Drive Ste 1600 Chicago, IL 60606	Electronic Service	No	OFF_SL_19-368_19-368_Official
Laurie	Williams	laurie.williams@sierraclub.org	Sierra Club	Environmental Law Program 1536 Wynkoop St Ste 200 Denver, CO 80202	Electronic Service	No	OFF_SL_19-368_19-368_Official
Joseph	Windler	jwindler@winthrop.com	Winthrop & Weinstine	225 South Sixth Street, Suite 3500  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-368_19-368_Official
Tim	Wulling	t.wulling@earthlink.net		1495 Raymond Ave.  Saint Paul, MN 55108	Electronic Service	No	OFF_SL_19-368_19-368_Official
Kurt	Zimmerman	kwz@ibew160.org	Local Union #160, IBEW	2909 Anthony Ln  St Anthony Village, MN 55418-3238	Electronic Service	No	OFF_SL_19-368_19-368_Official
Emily	Ziring	eziring@stlouispark.org	City of St. Louis Park	5005 Minnetonka Blvd  St. Louis Park, MN 55416	Electronic Service	No	OFF_SL_19-368_19-368_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Patrick	Zomer	Pat.Zomer@lawmoss.com	Moss & Barnett PA	150 S 5th St #1200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-368_19- 368_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Gary	Ambach	Gambach@slipstreaminc.org	Slipstream, Inc.	8973 SW Village Loop  Chanhassen, MN 55317	Electronic Service	No	OFF_SL_21-101_21-101 Official Service List
Alison C	Archer	aarcher@misoenergy.org	MISO	2985 Ames Crossing Rd  Eagan, MN 55121	Electronic Service	No	OFF_SL_21-101_21-101 Official Service List
Susan	Arntz	sarntz@mankatomn.gov	City Of Mankato	P.O. Box 3368  Mankato, MN 560023368	Electronic Service	No	OFF_SL_21-101_21-101 Official Service List
Mara	Ascheman	mara.k.ascheman@xcelenenergy.com	Xcel Energy	414 Nicollet Mall Fl 5  Minneapolis, MN 55401	Electronic Service	No	OFF_SL_21-101_21-101 Official Service List
Jessica L	Bayles	Jessica.Bayles@stoel.com	Stoel Rives LLP	1150 18th St NW Ste 325  Washington, DC 20036	Electronic Service	No	OFF_SL_21-101_21-101 Official Service List
David	Bender	dbender@earthjustice.org	Earthjustice	1001 G Street NW Suite 1000 Washington, District of Columbia 20001	Electronic Service	No	OFF_SL_21-101_21-101 Official Service List
Tracy	Bertram	tbertram@ci.becker.mn.us		12060 Sherburne Ave Becker City Hall Becker, MN 55308-4694	Electronic Service	No	OFF_SL_21-101_21-101 Official Service List
James J.	Bertrand	james.bertrand@stinson.com	STINSON LLP	50 S 6th St Ste 2600  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-101_21-101 Official Service List
Jessica	Beyer	jbeyer@greatermankato.com	Greater Mankato Growth	1961 Premier Dr Ste 100  Mankato, MN 56001	Electronic Service	No	OFF_SL_21-101_21-101 Official Service List
Ingrid	Bjorklund	ingrid@bjorklundlaw.com	Bjorklund Law, PLLC	855 Village Center Drive #256  North Oaks, MN 55127	Electronic Service	No	OFF_SL_21-101_21-101 Official Service List



First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Michael	Bull	mike@mrea.org	Minnesota Rural Electric Assn	11640 73rd Ave North Maple Grove, MN 55369	Electronic Service	No	OFF_SL_21-101_21-101 Official Service List
James	Canaday	james.canaday@ag.state.mn.us	Office of the Attorney General-RUD	Suite 1400 445 Minnesota St. St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-101_21-101 Official Service List
Thomas	Carlson	thomas.carlson@edf-re.com	EDF Renewable Energy	10 2nd St NE Ste. 400  Minneapolis, Minnesota 55413	Electronic Service	No	OFF_SL_21-101_21-101 Official Service List
John	Coffman	john@johncoffman.net	AARP	871 Tuxedo Blvd.  St. Louis, MO 63119-2044	Electronic Service	No	OFF_SL_21-101_21-101 Official Service List
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400  St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-101_21-101 Official Service List
Riley	Conlin	riley.conlin@stoel.com	Stoel Rives LLP	33 S. 6th Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-101_21-101 Official Service List
Brooke	Cooper	bcooper@allete.com	Minnesota Power	30 W Superior St  Duluth, MN 558022191	Electronic Service	No	OFF_SL_21-101_21-101 Official Service List
George	Crocker	gwillc@nawo.org	North American Water Office	PO Box 174  Lake Elmo, MN 55042	Electronic Service	No	OFF_SL_21-101_21-101 Official Service List
David	Dahlberg	davedahlberg@nweco.com	Northwestern Wisconsin Electric Company	P.O. Box 9 104 South Pine Street Grantsburg, WI 548400009	Electronic Service	No	OFF_SL_21-101_21-101 Official Service List
Matthew	Deal	matthew.deal@chargepoint.com	ChargePoint, Inc.	254 Hacienda Ave  Campbell, CA 95008	Electronic Service	No	OFF_SL_21-101_21-101 Official Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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J.	Drake Hamilton	hamilton@fresh-energy.org	Fresh Energy	408 St Peter St Ste 350  Saint Paul, MN 55101	Electronic Service	No	OFF_SL_21-101_21-101 Official Service List
Catherine	Fair	catherine@energycents.org	Energy CENTS Coalition	823 E 7th St  St Paul, MN 55106	Electronic Service	No	OFF_SL_21-101_21-101 Official Service List
John	Farrell	jfarrell@ilsr.org	Institute for Local Self-Reliance	2720 E. 22nd St Institute for Local Self-Reliance Minneapolis, MN 55406	Electronic Service	No	OFF_SL_21-101_21-101 Official Service List
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 280  Saint Paul, MN 551012198	Electronic Service	No	OFF_SL_21-101_21-101 Official Service List
Mike	Fiterman	mikefiterman@libertydiversified.com	Liberty Diversified International	5600 N Highway 169  Minneapolis, MN 55428-3096	Electronic Service	No	OFF_SL_21-101_21-101 Official Service List
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Philip	Hayet	phayet@jkenn.com	J. Kennedy and Associates, Inc.	570 Colonial Park Drive Suite 305 Roswell, GA 30075-3770	Electronic Service	No	OFF_SL_21-101_21-101 Official Service List
Adam	Heinen	aheinen@dakotaelectric.com	Dakota Electric Association	4300 220th St W  Farmington, MN 55024	Electronic Service	No	OFF_SL_21-101_21-101 Official Service List
Kimberly	Hellwig	kimberly.hellwig@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-101_21-101 Official Service List
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Michael	Krikava	mkrikava@taftlaw.com	Taft Stettinius & Hollister LLP	2200 IDS Center 80 S 8th St Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-101_21-101 Official Service List
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Peder	Larson	plarson@larkinhoffman.com	Larkin Hoffman Daly & Lindgren, Ltd.	8300 Norman Center Drive Suite 1000 Bloomington, MN 55437	Electronic Service	No	OFF_SL_21-101_21-101 Official Service List
Annie	Levenson Falk	annielf@cubminnesota.org	Citizens Utility Board of Minnesota	332 Minnesota Street, Suite W1360  St. Paul, MN 55101	Electronic Service	No	OFF_SL_21-101_21-101 Official Service List
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Emily	Marshall	emarshall@mojlaw.com	Miller O'Brien Jensen, PA	120 S. 6th Street Suite 2400 Minneapolis, Minnesota 55402	Electronic Service	No	OFF_SL_21-101_21-101 Official Service List
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Joseph	Meyer	joseph.meyer@ag.state.mn.us	Office of the Attorney General-RUD	Bremer Tower, Suite 1400 445 Minnesota Street St Paul, MN 55101-2131	Electronic Service	No	OFF_SL_21-101_21-101 Official Service List
Stacy	Miller	stacy.miller@minneapolismn.gov	City of Minneapolis	350 S. 5th Street Room M 301 Minneapolis, MN 55415	Electronic Service	No	OFF_SL_21-101_21-101 Official Service List
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Kristin	Munsch	kmunsch@citizensutilityboard.org	Citizens Utility Board of Minnesota	309 W. Washington St. Ste. 800 Chicago, IL 60606	Electronic Service	No	OFF_SL_21-101_21-101 Official Service List
Amanda	Myers	amanda@weavegrid.com	Weave Grid, Inc.	222 7th Street 2nd Floor San Francisco, California 94103	Electronic Service	No	OFF_SL_21-101_21-101 Official Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Rolf	Nordstrom	rnordstrom@gpisd.net	Great Plains Institute	2801 21ST AVE S STE 220 Minneapolis, MN 55407-1229	Electronic Service	No	OFF_SL_21-101_21-101 Official Service List
M. William	O'Brien	bobrien@mojlaw.com	Miller O'Brien Jensen, P.A.	120 S 6th St Ste 2400 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-101_21-101 Official Service List
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Carol A.	Overland	overland@legalelectric.org	Legalelectric - Overland Law Office	1110 West Avenue Red Wing, MN 55066	Electronic Service	No	OFF_SL_21-101_21-101 Official Service List
Jessica	Palmer Denig	jessica.palmer-Denig@state.mn.us	Office of Administrative Hearings	600 Robert St N PO Box 64620 St. Paul, MN 55164	Electronic Service	No	OFF_SL_21-101_21-101 Official Service List
Audrey	Partridge	apartridge@mncee.org	Center for Energy and Environment	212 3rd Ave. N. Suite 560 Minneapolis, Minnesota 55401	Electronic Service	No	OFF_SL_21-101_21-101 Official Service List
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Kevin	Pranis	kpranis@liunagro.com	Laborers' District Council of MN and ND	81 E Little Canada Road  St. Paul, Minnesota 55117	Electronic Service	No	OFF_SL_21-101_21-101 Official Service List
Greg	Pruszinske	gpruszinske@ci.becker.mn.us	City of Becker	PO Box 250 12060 Sherburne Ave Becker, MN 55308	Electronic Service	No	OFF_SL_21-101_21-101 Official Service List
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_21-101_21-101 Official Service List
Kevin	Reuther	kreuther@mncenter.org	MN Center for Environmental Advocacy	26 E Exchange St, Ste 206  St. Paul, MN 551011667	Electronic Service	No	OFF_SL_21-101_21-101 Official Service List
Richard	Savelkoul	rsavelkoul@martinsquires.com	Martin & Squires, P.A.	332 Minnesota Street Ste W2750  St. Paul, MN 55101	Electronic Service	No	OFF_SL_21-101_21-101 Official Service List
Jacob J.	Schlesinger	jschlesinger@keyesfox.com	Keyes & Fox LLP	1580 Lincoln St Ste 880  Denver, CO 80203	Electronic Service	No	OFF_SL_21-101_21-101 Official Service List
Christine	Schwartz	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7  Minneapolis, MN 554011993	Electronic Service	Yes	OFF_SL_21-101_21-101 Official Service List
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Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th PI E Ste 350  Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-101_21-101 Official Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Beth H.	Soholt	bsoholt@windonthewires.org	Wind on the Wires	570 Asbury Street Suite 201  St. Paul, MN 55104	Electronic Service	No	OFF_SL_21-101_21-101 Official Service List
Anna	Sommer	ASommer@energyfuturesgroup.com	Energy Futures Group	PO Box 692  Canton, NY 13617	Electronic Service	No	OFF_SL_21-101_21-101 Official Service List
Mark	Spurr	mospurr@fvbenergy.com	International District Energy Association	222 South Ninth St., Suite 825  Minneapolis, Minnesota 55402	Electronic Service	No	OFF_SL_21-101_21-101 Official Service List
Byron E.	Starns	byron.starns@stinson.com	STINSON LLP	50 S 6th St Ste 2600  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-101_21-101 Official Service List
James M	Strommen	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered	150 S 5th St Ste 700  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-101_21-101 Official Service List
Eric	Swanson	eswanson@winthrop.com	Winthrop & Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_21-101_21-101 Official Service List



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Christopher	Villarreal	cvillarreal@rstreet.org	R Street Institute	1212 New York Ave NW Ste 900 Washington, DC 20005	Electronic Service	No	OFF_SL_21-101_21-101 Official Service List
Julie	Voeck	julie.voeck@nee.com	NextEra Energy Resources, LLC	700 Universe Blvd  Juno Beach, FL 33408	Electronic Service	No	OFF_SL_21-101_21-101 Official Service List
Samantha	Williams	swilliams@nrdc.org	Natural Resources Defense Council	20 N. Wacker Drive Ste 1600 Chicago, IL 60606	Electronic Service	No	OFF_SL_21-101_21-101 Official Service List
Laurie	Williams	laurie.williams@sierraclub. org	Sierra Club	Environmental Law Program 1536 Wynkoop St Ste 200 Denver, CO 80202	Electronic Service	No	OFF_SL_21-101_21-101 Official Service List
Joseph	Windler	jwindler@winthrop.com	Winthrop & Weinstine	225 South Sixth Street, Suite 3500  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-101_21-101 Official Service List
Jeff	Zethmayr	jzethmayr@citizensutilitybo ard.org	Citizens Utility Board	309 W. Washington, Ste 800  Chicago, IL 60606	Electronic Service	No	OFF_SL_21-101_21-101 Official Service List
Kurt	Zimmerman	kwz@ibew160.org	Local Union #160, IBEW	2909 Anthony Ln  St Anthony Village, MN 55418-3238	Electronic Service	No	OFF_SL_21-101_21-101 Official Service List
Patrick	Zomer	Pat.Zomer@lawmoss.com	Moss & Barnett PA	150 S 5th St #1200  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-101_21-101 Official Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400  St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_17-401_Official
David	Dahlberg	davedahlberg@nweco.com	Northwestern Wisconsin Electric Company	P.O. Box 9 104 South Pine Street Grantsburg, WI 548400009	Electronic Service	No	OFF_SL_17-401_Official
John	Farrell	jfarrell@ilsr.org	Institute for Local Self-Reliance	2720 E. 22nd St Institute for Local Self-Reliance Minneapolis, MN 55406	Electronic Service	No	OFF_SL_17-401_Official
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 280  Saint Paul, MN 551012198	Electronic Service	No	OFF_SL_17-401_Official
Katherine	Hamilton	katherine@aem-alliance.org	Advanced Energy Management Alliance	1701 Rhode Island Ave, NW  Washington, DC 20036	Electronic Service	No	OFF_SL_17-401_Official
William D	Kenworthy	will@votesolar.org	Vote Solar	332 S Michigan Ave FL 9  Chicago, IL 60604	Electronic Service	No	OFF_SL_17-401_Official
Brad	Klein	bklein@elpc.org	Environmental Law & Policy Center	35 E. Wacker Drive, Suite 1600 Suite 1600 Chicago, IL 60601	Electronic Service	No	OFF_SL_17-401_Official
Annie	Levenson Falk	annief@cupminnesota.org	Citizens Utility Board of Minnesota	332 Minnesota Street, Suite W1360  St. Paul, MN 55101	Electronic Service	No	OFF_SL_17-401_Official
Gregory C.	Miller	gmiller@dakotaelectric.com	Dakota Electric Association	4300 220th Street West  Farmington, MN 55024	Electronic Service	No	OFF_SL_17-401_Official
Kristin	Munsch	kmunsch@citizensutilityboard.org	Citizens Utility Board of Minnesota	309 W. Washington St. Ste. 800 Chicago, IL 60606	Electronic Service	No	OFF_SL_17-401_Official

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Audrey	Partridge	apartridge@mncee.org	Center for Energy and Environment	212 3rd Ave. N. Suite 560  Minneapolis, Minnesota 55401	Electronic Service	No	OFF_SL_17-401_Official
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_17-401_Official
Joseph L	Sathe	jsathe@kennedy-graven.com	Kennedy & Graven, Chartered	150 S 5th St Ste 700  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_17-401_Official
Christine	Schwartz	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7  Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_17-401_Official
Doug	Scott	dscott@gpisd.net	Great Plains Institute	2801 21st Ave Ste 220  Minneapolis, MN 55407	Electronic Service	No	OFF_SL_17-401_Official
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th PI E Ste 350  Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_17-401_Official
Patricia F	Sharkey	psharkey@environmentalallawcounsel.com	Midwest Cogeneration Association.	180 N LaSalle St Ste 3700 Chicago, IL 60601	Electronic Service	No	OFF_SL_17-401_Official
James M	Strommen	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered	150 S 5th St Ste 700  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_17-401_Official
Christopher	Villarreal	cvillarreal@rstreet.org	R Street Institute	1212 New York Ave NW Ste 900 Washington, DC 20005	Electronic Service	No	OFF_SL_17-401_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Jeff	Zethmayr	jzethmayr@citizensutilityboard.org	Citizens Utility Board	309 W. Washington, Ste 800  Chicago, IL 60606	Electronic Service	No	OFF_SL_17-401_Official