

January 13, 2026

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

RE: Comments of the Minnesota Department of Commerce
Docket No. E002/M-25-142

Dear Ms. Bergman,

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

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

Xcel Energy's 2025 Integrated Distribution Plan (IDP) and Transportation Electrification Plan (TEP) were filed on November 1, 2025.

The Department submits these initial comments in response to Xcel's TEP. The Department requests additional information from Xcel in the utility reply comment period. The Department is available to answer any questions the Minnesota Public Utilities Commission may have.

Sincerely,

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

RW/BP/ad
Attachment

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Acronyms and Abbreviations

BIPOC	Black, Indigenous, and People of Color
DCFC	Direct Current Fast Charging
DER	Distributed Energy Resource
ECO	Energy Conservation & Optimization
EFS	Efficient-Fuel Switching
EJ	Environmental Justice
ESB	Electric School Bus
EV	Electric Vehicle
EVAAH	Electric Vehicle Accelerate at Home
EVSE	Electric Vehicle Supply Equipment
EVSI	Electric Vehicle Supply Infrastructure
GHG	Greenhouse Gas
IDP	Integrated Distributed Plan
IR	Information Request
kWh	Kilowatt-hour
LMI	Low-to-Moderate Income
MDU	Multi-Dwelling Unit
MNDOT	Minnesota Department of Transportation
MPCA	Minnesota Pollution Control Agency
NEVI	National Electric Vehicle Infrastructure
OEM	Original Equipment Manufacturer
OYC	Optimize Your Charge
TEP	Transportation Electrification Plan
TOU	Time of Use
V2G	Vehicle-to-Grid



Before the Minnesota Public Utilities Commission

Comments of the Minnesota Department of Commerce

Docket No. E002/M-25-142

I. INTRODUCTION

The Department provides the following comments on Xcel’s Transportation Electrification Plan (TEP). Through these comments, the Department responds to the Notice of Comment (Notice) issued by the Commission on November 13, 2025, which addresses both the Company’s Integrated Distribution Plan (IDP) and TEP.¹

In its July 16, 2019 Order Accepting Report, and Amending Requirements, the Minnesota Public Utilities Commission (Commission) discusses its interest in developing an Integrated Distribution Planning process:

Utility distribution systems have historically functioned without substantial oversight of system planning by regulators. Consequently, regulators have played very little role in overseeing and understanding distribution system planning and operational processes.

However, the Commission recognized that distribution system planning is necessary to understand the need, cost, and benefits of upcoming distribution system investments. These investments have significant cost and long-term implications for the power system. Over the past several years, the Commission has investigated utility distribution system planning and the modernization of the electric grid as the concepts pertain to rate-regulated utilities generally and Xcel specifically.²

The IDP process allows for greater transparency into the distribution system planning process used by utilities. Distribution plans cover utility infrastructure from the substation to the meter, as well as customer offerings in these areas. The need for distribution system planning is enhanced by the increasing complexity of the distribution grid created by smart grid technologies, electric vehicles, and other distributed energy resources (DER). Due to the rise in these technologies, ratepayers will have an increasingly interactive role in distribution grid management, which further establishes the need for greater transparency in the distribution grid planning process. The Commission set forth five planning objectives for IDPs, with additional filing requirements to promote transparency in distribution system planning. The Commission’s planning objectives for IDPs are to:

¹ *In the Matter of Xcel Energy’s 2025 Integrated Distribution Plan, Notice of Comment Period*, Docket No. E002/M-25-142, (eDockets) [202511-224924-01](#) (hereinafter, “Notice”).

² *In the Matter of Xcel Energy’s 2018 Integrated Distribution Plan, Order Accepting Report, and Amending Requirements*, July 16, 2019, Docket No. E002-CI-18-251, (eDockets) [20197-154416-01](#) at 2-3.

1. Maintain and enhance the safety, security, reliability, and resilience of the electricity grid, at fair and reasonable costs, consistent with the state’s energy policies;
2. Enable greater customer engagement, empowerment, and options for energy services;
3. Move toward the creation of efficient, cost-effective, accessible grid platforms for new products, new services, and opportunities for adoption of new distributed technologies;
4. Ensure optimized utilization of electricity grid assets and resources to minimize total system costs; and
5. Provide the Commission with the information necessary to understand the utility’s short-term and long-term distribution-system plans, the costs and benefits of specific investments, and a comprehensive analysis of ratepayer cost and value.³

On October 31, 2025 Northern States Power Company d/b/a Xcel Energy (Xcel or the Company) filed its 2025 IDP and TEP in Docket No. E002/M-25-142.⁴ Xcel organizes its TEP in several sections: 1. Transportation Electrification Efforts, 2. Ongoing EV Developments, 3. New EV Programs, 4. Cost Recovery, and 5. Proposed Tariff Changes.⁵ Xcel includes three new EV programs in Section 3 of the TEP. These new EV proposals are largely the focus of the present comments; in the Company’s 2025 TEP, it proposes a Commercial EV Infrastructure Rebate and Advisory Program, a Residential Advisory Services and Guided Charging Installation Program, and a Charging Perks Active Managed Charging Program. The Department addresses each new proposal as well as Xcel’s proposed tariff changes (including proposed changes to the Company’s EV Accelerate at Home Programs) and its work to ensure equitable customer outcomes in the sections below.⁶

On November 13, 2025, the Commission issued a Notice of Comment period with three separate periods for comments. These comments respond to the first in the series of 2025 IDP and TEP filings. The first Xcel comment period, addressed in these comments, corresponds to Xcel’s TEP and includes Notice Topics 1 through 6. The second comment period, to be addressed in future comments, corresponds to Xcel’s Proactive Upgrade Proposal and includes Notice Topics 7 through 10. The third comment period, to be addressed in future comments as well, corresponds to Xcel’s 2025 Certification Request and its 2025 Integrated Distribution System Plan and includes Notice Topics 11 through 17.⁷

³ *In the Matter of Distribution System Planning for Xcel Energy, Order Approving Integrated Distribution Planning Filing Requirements for Xcel Energy*, August 30, 2018, Docket No. E002/CI-18-251, (eDockets) [20188-146119-01](#).

⁴ *In the Matter of Xcel Energy’s 2025 Integrated Distribution Plan*, IDP and TEP filings, October 31, 2025, Docket No. E002-M-25-142, (eDockets) [202510-224538-01](#) and [202510-224529-01](#).

⁵ *In the Matter of Xcel Energy’s Integrated Distribution Plan*, Xcel Energy, 2025 Transportation Electrification Plan, Docket No. E002/M-25-142, (eDockets) [202510-224529-01](#) (hereinafter, “2025 TEP”) at 3.

⁶ 2025 TEP, at 52-68.

⁷ Notice.

II. PROCEDURAL BACKGROUND

- March 24, 2016 The Commission filed its Staff Report on Grid Modernization outlining a phased process and potential options for the Commission to pursue in its investigation of the state’s grid modernization efforts.⁸
- August 30, 2018 The Commission issued its Order Approving Integrated Distribution Planning Filing Requirements for Xcel Energy and adopted IDP filing requirements for Xcel.⁹
- July 16, 2019 The Commission issued its Order Accepting Report, and Amending Requirements accepting Xcel’s first IDP, setting the filing date for the Company’s next IDP and amending IDP reporting requirements for future IDP filings.¹⁰
- December 8, 2022 The Commission issued its Order in Docket Nos. E002/M-21-694, E999/CI-17-879.¹¹ The Order approved combining the filing requirements of electric utility IDPs and TEPs.
- May 2023 The Minnesota Legislature established requirements for utility TEPs in 2023 Minn. Laws. ch. 60, art. 12, sec. 12, codified at Minn. Stat. § 216B.1615 – Electric Vehicle Deployment Program. Minn. Stat. § 216B.1615 requires electric utilities to file TEPs, established certain content requirements, granted the Commission authority to approve, modify or reject TEPs, and established evaluation criteria.¹²
- August 23, 2023 The Commission issued its *Order Accepting Withdrawal of Clean Transportation Portfolio Subject to Conditions*.¹³ The Order placed a number of conditions upon Xcel Energy, including that it file a TEP by November 1, 2023 consistent with Minn. Stat. § 216B.1615 and that various components and information be included in its filing.¹⁴

⁸ *In the Matter of a Commission Investigation into Grid Modernization, Staff Report*, March 24, 2016, Docket No. E999/CI-15-556, (eDockets) [20163-119406-01](#).

⁹ *In the Matter of Distribution System Planning for Xcel Energy, Order Approving Integrated Distribution Planning Filing Requirements for Xcel Energy*, August 30, 2018, Docket No. E002/CI-18-251, (eDockets) [20188-146119-01](#).

¹⁰ *In the Matter of Xcel Energy’s 2018 Integrated Distribution Plan, Order Accepting Report, and Amending Requirements*, July 16, 2019, Docket No. E002-CI-18-251, (eDockets) [20197-154416-01](#).

¹¹ *In the Matter of a Commission Inquiry into Electric Vehicle Charging and Infrastructure; In the Matter of Xcel Energy’s 2021 Integrated Distribution System Plan; In the Matter of Minnesota Power’s 2021 Integrated Distribution System Plan; In the Matter of Distribution System Planning for Otter Tail Power Company, Order*, December 8, 2022, Docket Nos. E-99/CI-17-879, E-002/M-21-694, E-015/M-21-390, E-017/M-21-612.

¹² [Minn. Stat. § 216B.1615](#) (hereinafter “Minnesota EV Deployment Program Statute”).

¹³ *Order Accepting Withdrawal of Clean Transportation Portfolio Subject to Conditions*, (August 23, 2023) Docket No. E002/M-22-432 (hereinafter, “August 23, 2023 Order”).

¹⁴ *Id.*, at 9.

November 1, 2025 Xcel Energy Files its 2025 TEP¹⁵ and IDP.

November 13, 2025 The Commission issued its Notice of Comment Period in the present docket denoting TEP comments are to be filed ahead of the Proactive Upgrade Proposal and IDP comments.¹⁶

Topic(s) open for comment:

- Should the Commission approve, modify, or reject Xcel Energy’s 2025 TEP?
- Are there gaps in Xcel Energy’s transportation electrification programs the Commission should address to ensure equitable customer outcomes?
- Should the Commission approve, modify, or reject Xcel’s proposed modifications to its EV Accelerate at Home Programs? Please discuss whether the Commission should:
 - Approve the updated tariff sheets.
 - Approve the updated customer service agreements.
 - Approve the proposed accounting treatment.
 - Approve the proposed reporting requirements.
 - Address any other issues or concerns
- Should the Commission approve, modify or reject Xcel’s proposed actively managed charging program, Charging Perks? Please discuss whether the Commission should:
 - Approve the updated tariff sheets.
 - Approve the updated customer service agreements.
 - Approve the proposed accounting treatment.
 - Approve the proposed reporting requirements.
 - Address any other issues or concerns.
- Should the Commission approve, modify, or reject Xcel’s related energy rate and monthly customer charge program modifications?
- Are there other issues or concerns related to this matter?

III. DEPARTMENT ANALYSIS

The Department analyzes Xcel’s TEP and offers recommendations both to promote transportation electrification consistent with the public interest and to ensure that the Commission is presented with the resources needed to make an informed decision. The Department looks to relevant statute and Commission Orders to define the boundaries and parameters of the public interest in this venue, including: expansion of transportation electrification, optimization of EV benefits, removal of barriers to adoption, and clarification of the role of utilities in transportation electrification.

¹⁵ 2025 TEP.

¹⁶ Notice.

In evaluating the Company's Charging Perks proposal, the Department analyzes the Company's proposal under the relevant statute, Minn. Stat. § 216B.1615.¹⁷ Subdivision 1 of the Minn. Stat. § 216B.1615 defines relevant terms. Subdivision 2 defines the contents of the TEP public utilities are required to file. Subdivision 3 of the relevant statute gives authority to the Commission to approve, modify, or reject a TEP and the rubric under which that decision is to be made. Subdivision 4 of the statute gives the Commission authority to approve cost recovery under Minn. Stat. § 216B.16 for investments made and expenses incurred under an approved plan.

The Department also provides a preliminary analysis of the Company's two ECO proposals (the Commercial EV Infrastructure Rebate and Advisory Program and the Residential Advisory Services and Guided Charging Installation Program) for fitness for ECO review and the Company's intention to comply with the ECO statute—Minn. Stat. §216B.241.

The Department additionally recognizes the importance of electrifying Minnesota's transportation sector consistent with both the Commission's February 1, 2019 Order in Docket No. E999/CI-17-879 (EV Inquiry Order)¹⁸ and subsequent Orders in similar proceedings.

A. *APPROVE, MODIFY, OR REJECT*

The Department responds to the following notice topics:

Should the Commission approve, modify, or reject Xcel Energy's TEP?

The Department will provide a final recommendation on Xcel's TEP in its reply comments.

B. *EQUITABLE CUSTOMER OUTCOMES*

The Department responds to the following notice topic:

Are there gaps in Xcel Energy's transportation electrification programs the Commission should address to ensure equitable customer outcomes?

Minn. Stat. § 216B.1615,¹⁹ Subd. 2(b)(5) provides that a TEP may include "programs targeting transportation electrification in low- and moderate-income communities in neighborhoods most affected by transportation-related air emissions." Minn. Stat. § 216B.1615,²⁰ Subd. 3(2) requires Commission consideration of whether the TEP proposals are reasonably expected to "increase access to the use of electricity as transportation fuel for all customers, including those in low- and moderate-income communities, rural communities, and communities most affected by air emissions from the transportation sector." In addition, the Commission's August 23, 2023 Order required Xcel to include in

¹⁷ Minnesota EV Deployment Program Statute.

¹⁸ *In the Matter of a Commission Inquiry into Electric Vehicle Charging and Infrastructure, Order Making Findings and Requiring Filings*, February 1, 2019, Docket No. E-999/CI-17-879, (eDockets) [20192-149933-02](#) (hereinafter "EV Inquiry Order").

¹⁹ Minnesota EV Deployment Program Statute.

²⁰ *Ibid.*

its TEP “a breakdown by proposal of what percent of investments or enrolled customers Xcel estimates will be located in environmental-justice areas as defined by Minn. Stat. § 216B.1691, Subd. 1(e) (2023 Minn. Laws ch. 7, sec. 3).”²¹

Xcel positions its Clean Transportation Portfolio as a tool to “reduc[e] identified barriers to transportation electrification in a cost-effective way while also promoting equity and environmental justice.”²² Xcel structures the equity section explicitly around Order Point 21.f of the Commission’s May 9, 2024 Order in Docket No. E002/M-23-452,²³ which focuses on the Company’s performance across five primary criteria: transportation pollution, housing density, racial demographics, income levels, and rural accessibility. The Company performs geospatial analyses of program sites against Minnesota Pollution Control Agency (MPCA) Environmental Justice (EJ) indicators and pollution data and provides an overview of the Company’s transportation programs relative to EJ and pollution-based burdened areas—an equity analysis of the Company’s transportation portfolio is provided in the 2025 TEP.²⁴

B.1. Equity Analysis of Existing Programs

Xcel’s 2025 TEP reported equity-focused access models for HOURCAR/EVIE Community Carshare and Multi-family Carshare hubs through the Public Charging Pilot and related MDU investments. Xcel and HOURCAR report that in 2024, EVIE Carshare users took more than 165,000 trips and saved an estimated \$14.9 million in transportation costs, with a high share of usage from very low-income and BIPOC users, which indicates that the service functions as a material cost-saving and access resource for priority communities.²⁵

Xcel’s Carshare programs directly address barriers that traditional home charger and rebate approaches cannot, such as lack of vehicle ownership, lack of dedicated parking, and limited ability to finance private equipment. The Carshare program approach leverages a model that relies on shared, on-street vehicles in neighborhoods where many residents are renters or do not own a car. Moreover, the reported metrics (trips, miles, GHG reduction, cost savings, and demographic mix) move beyond simple counts of chargers to show who benefits and by how much; these metrics align with national recommendations that equity metrics focus on outcomes, not just deployment.²⁶

B.1.1. Commercial and public portfolio alignment with EJ and pollution burdens

The Company’s equity analysis demonstrates a significant variance in how effectively different programs align with different equity metrics (see Department Table 1).

²¹ August 23, 2023 Order at Order Point 5.H. See also, [Minn. Stat. § 216B.1691, subd. 1\(e\)](#) (2023).

²² 2025 TEP, at 42.

²³ *In The Matter of Xcel Energy’s 2023 Integrated Distribution Plan, Order Approving Xcel Energy’s 2023 Transportation Electrification Plan with Modifications*, May 9, 2024, Docket No. E-002/M-23-452, (eDockets) [20245-206560-01](#).

²⁴ 2025 TEP, at 42-49.

²⁵ *Id.*, at 43.

²⁶ *Ibid.*

Department Table 1. Xcel Table 7- Commercial Sites Located in Areas Disproportionately Impacted by Transportation Pollution

Program	Percentage
MDU Pilot	50%
Fleet Pilot	61%
Public Charging Pilot	70%
Company-owned DCFC	17%

The Company’s analysis demonstrates that Public Charging and Multi-family pilot programs are more effective in reaching areas impacted by pollution and poverty than residential-owned programs. The Public Charging Pilot demonstrates the strongest geographic alignment with EJ goals, with 70% of its sites located in areas where transportation is identified as the primary source of pollution. By focusing on areas with high transportation pollution, the siting process successfully targets high-traffic corridors where electrification provides the largest local air quality benefits. In contrast, Company-owned DCFC stations show significantly lower alignment—17%—which the Company attributes to their strategic placement in rural corridors that are unlikely to attract private investment:

Company-owned DCFC stations are largely located in rural areas across out service territory since the program is aimed at serving locations unlikely to receive private investment. Those areas are less likely to have transportation as a top three source of pollution.²⁷

The Company-owned DCFC stations serve as the primary mechanism for rural equity within the portfolio, with 33% of these customers located in rural communities (see Department Table 2). While the DCFC stations may not solve for immediate urban population concerns, they are essential for mitigating lack of charging stations in Greater Minnesota.

The customer distribution for LMI customers that live in communities of color reveals a distinct difference between the reach of commercial pilots and the Company’s standard residential managed charging program. The MDU Pilot and Public Charging Pilot serve areas with high concentration of renters and multi-family units, at 50% and 49% respectively.

Department Table 2. Department’s Summary Table of Xcel Energy’s Transportation Programs Customer Distribution by Equity Metric and Program Type.

Program Metric	MDU Pilot	Fleet Pilot	Public Charging Pilot	Company-owned DCFC	EVA AH	OYC
In High-Renter/MDU Areas	50%	35%	49%	0%	6%	6%
In Communities where 40 Percent or More of Population Identify as People of Color	31%	22%	32%	0%	8%	10%
In High-Poverty Areas	54%	26%	36%	33%	4%	4%

²⁷ 2025 TEP, footnote 62, at 44.

In Rural Communities	0%	0%	3%	33%	3%	3%
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Department Table 2 presents a stark participation cliff between Xcel’s commercial/public pilots and its residential programs (EVAAH and OYC). While the MDU and Public Charging Pilots successfully reach high-poverty areas and communities of color, EVAAH and OYC Pilot show significantly lower penetration, with enrollment in the same communities. The difference in participation suggests that while Xcel has successfully sited infrastructure in priority areas, individual household enrollment remains a significant hurdle. Without intervention, the benefits of the residential programs will remain inaccessible to the very populations that Carshare and Public Charging pilots have shown are eager to utilize EVs. The Department requires a deeper understanding of the friction points preventing residents in high-priority communities from transitioning into long-term program participants.

The Department requests that Xcel, in reply comments, identify the specific program design and implementation barriers that have limited enrollment among renters and residents of the identified communities, with particular attention to landlord approval requirements, split incentive issues, and gaps in program awareness. The Department further requests that Xcel propose concrete strategies to address these barriers, including measures to streamline property owner approvals and detailed community engagement plans tailored to historically under-served areas to increase enrollment and sustained participation.

B.1.2. Persistent residential under-reach in priority geographies

Department Table 2 shows that EVAAH and OYC programs have very low penetration in high-renter/MDU-majority tracts, LMI areas, and communities of color, despite being core residential offerings. The reported share, around 4% in high-poverty tracts, roughly 6% in renter/multi-family-majority tracts, and roughly 8-10% in communities of color tracts, are materially lower than the shares observed for several commercial pilot programs and are inconsistent with an equitable distribution of benefits.

These patterns mirror widely documented EV adoption dynamics, in which early home charging programs tend to skew toward higher-income homeowners with garages and existing access to capital, rather than renters and lower-income households.²⁸ In this case, however, the under-reach is not hypothetical; it is evident in the Company’s screening results.

The Department requests that Xcel, in reply comments, evaluate how the current program structure addresses financial barriers to entry, particularly regarding upfront installation outlays and credit qualification processes. The Department requests that Xcel propose modifications to the customer journey, such as alternative qualification methods or restructuring when incentives are applied, to mitigate these barriers for income-constrained households.

²⁸ Lee, Dong-Yeon, Melanie H. McDermott, Benjamin K. Sovacool, and Raphael Isaac. "Toward just and equitable mobility: Socioeconomic and perceptual barriers for electric vehicles and charging infrastructure in the United States." *Energy and Climate Change* 5 (2024): [100146](#).

B.1.3. LMI Measurement Limits

By its failure to track income-qualified participation using Minnesota-relevant definitions (such as percent of State Median Income, Area Median Income, or energy assistance enrollment), Xcel leaves the Commission without a credible basis to conclude that LMI customers meaningfully participate in, or benefit from, the portfolio. The reliance on EJ geography and tract-level poverty data as proxies of income risks both over- and under-counting LMI benefits: a charger in a high-poverty EJ tract could be priced or operated in ways that deter local low-income residents, while low-income customers who live just outside designated tracts may remain invisible to the metrics.

This conflation of place-based and customer-based equity is particularly important where Xcel proposes higher incentives for “EJ communities” without a corresponding income-based qualification, because it can allow the Company to claim equity performance on the basis of siting alone. While place-based equity metrics may create a uniform criteria for all commercial customers to use in assessing their eligibility for higher rebate amounts, these metrics cannot confirm that benefits are going to LMI customers.

B.2. New Programs proposed in 2025 TEP

Xcel Energy introduces several initiatives designed to streamline EV adoption and infrastructure deployment, with a stated focus to remove financial and technical barriers.

1. *Commercial EV Infrastructure Rebate and Advisory Program*: This program aims to provide technical assistance and financial rebates to commercial customers for the installation of EV charging infrastructure. A key equity feature is the provision of comparatively larger rebates for customers building infrastructure in Environmental Justice (EJ) areas as defined by Minnesota statute.
2. *Residential Advisory Services and Guided Charging Installation Program*: This program is designed to simplify the charging installation process for residential customers. It includes a continued partnership with HOURCAR to support carsharing and provides specialized advisory services to help residents, particularly those in Multi-Family Dwellings (MDUs), to navigate the complexities of home charging.
3. *Charging Perks Managed Charging Program*: Charging Perks is an active managed charging program that uses vehicle telematics to directly shift charging away from system peaks. Participants receive recurring financial credits in exchange for allowing the utility to remotely adjust charging schedules, a strategy designed to improve grid reliability and defer expensive distribution infrastructure upgrades.

B.2.1. Commercial EV Infrastructure Rebate and Advisory Program

The 2025 TEP proposes a consolidation of the disparate pilot programs into a single Commercial EV Infrastructure Rebate and Advisory Program. The Company argues that the utility-owned model proved rigid, complex to contract, and slow to deploy, particularly for customers with unique needs such as

MDU developers and fleet operators.²⁹ The new proposal shifts the capital responsibility to the customer, supported by a flat-rate rebate: for example, \$6,500 per Level 2 port for standard projects and \$10,000 for projects in EJ areas (see Department Table 3).³⁰

Department Table 3. Xcel Energy Table 13 Commercial EVSI Rebates

Charging Type	Standard (\$/Port)	EJ (\$/Port)
Level 2	\$6,500	\$10,000
DCFC	\$13,000	\$20,000

The Commercial EV Infrastructure Rebate and Advisory Program incorporates several equity-oriented design elements, including assignable, point-of-sale rebates that allow customers to transfer incentive value to contractors or developers to directly reduce upfront installation costs, which is particularly important for MDUs, small businesses, and community hosts with limited cash flow and borrowing capacity. The program’s explicit pass-through requirement—that entities accepting rebates on behalf of customers must demonstrate that cost savings are reflected on the customer’s bill—addresses a common concern in infrastructure programs that intermediaries might retain some of the ratepayer-funded value instead of delivering it to residents or small hosts. The proposal offers higher rebates in EJ-designated areas, with those rebates intended to cover a larger share of eligible costs than standard rebates and reflects a deliberate attempt to align incentive strength with community need.

The Petition also confirms the assignable, point-of-sale rebate design that underpins much of the affordability rationale:

All rebates available in this program will be assignable by the customer to a third party of their choosing. Under this structure, customers who own and operate a charging station will be allowed to assign their rebate to the installing contractor or charging developer who can apply the rebate to reduce the billed amount to the customer, creating a point-of-sale rebate. This reduces cost barriers to customers or site hosts that may not have the cash on hand to pay for a project in full and recoup rebate dollars later.³¹

While the proposal has merit, the decoupling of EJ geographic definitions from traditional income-qualification criteria creates a significant equity risk. Specifically, without parallel income-verified pathways, enhanced rebates intended for underserved communities may disproportionately benefit well-resourced site hosts located within EJ tracts, such as large institutions or high-end developments, rather than the intended low-income residents:

²⁹ 2025 TEP, at 28.

³⁰ *Id.*, Table 13, at 55.

³¹ *Id.*, at 55.

The Company acknowledges that this is not a traditional definition of “income qualified” and is identifying a particular group of customers.³²

The enforcement mechanisms for the pass-through requirement are currently too vague to ensure compliance. Without strict standards for contract language, invoice transparency, and routine auditing, there is a significant risk that benefits will be absorbed by developers rather than reaching the end-user, particularly in complex projects involving turnkey providers or layered financing. While digital portals and pre-qualified lists improve efficiency, they create effective barriers for smaller, rural, or community-based contractors. Without targeted technical assistance and inclusive onboarding, these administrative hurdles will likely exclude local vendors that lack the resources to navigate complex qualification processes, favoring large incumbents instead.

The Department requests Xcel clarify, in its reply comments, the specific auditing procedures, contract standards, and technical assistance measures it will implement to ensure rebate pass-through compliance for end-users and to facilitate program participation by small, rural, and community-based contractors.

B.2.2. Charging Perks

Charging Perks, the proposed successor to Optimize Your Charge, raises a distinct set of equity risks rooted in its cost-effectiveness profile and benefit distribution. Xcel characterizes Charging Perks as an active managed charging program that pays an upfront enrollment incentive and ongoing bill credits, with higher annual incentives for customers located on “distribution-optimized” feeders where EV load management is expected to deliver the greatest system benefits,³³ which is conceptually aligned with good resource planning practice.

At the same time, the Company acknowledges that the program is not cost-effective under traditional screening tests, largely because unmanaged EV charging in its service area already occurs substantially off-peak and because administrative and technology costs are significant relative to incremental system benefits.³⁴ This admission heightens the importance of an explicit equity justification: if non-participants, including many low-income households without EVs, are being asked to fund a program that fails standard cost-benefit thresholds, the Commission must be able to see who is expected to benefit, how those benefits are distributed across income and geography, and what guardrails will prevent the program from becoming a subsidy for early adopters clustered in higher-income areas.

While the Department supports prioritizing enrollment on constrained feeders to mitigate system-wide costs by deferring infrastructure upgrades that would otherwise impact the rate base for all customers, the Department notes that when incentive eligibility is contingent upon localized grid conditions, the

³² *Id.*, footnote 79 at 55.

³³ *Id.*, at 61-62.

³⁴ *Id.*, at 64.

availability of the benefits is inherently limited to specific geographic areas with a risk of excluding potential LMI customers or renters.

Finally, because Charging Perks relies on ongoing behavioral and technical participation (e.g., telematics, consistent enrollment, comfort with remote control of charging), the program could pose additional participation barriers for customers with unstable housing, limited digital access, language barriers, or older vehicles and chargers. The Department notes that Charging Perks should encompass not only incentive levels but also technology choices, communication practices, and customer protections around data, control, and opt-out rights.

The Department requests Xcel, in reply comments, provide geographic analysis demonstrating the distribution of 'standard' vs. 'distribution optimized' customer enrollment across 1) census tracts with high poverty concentrations; 2) environmental justice areas; 3) communities of color; and 4) rural communities. The Department requests this analysis include projected enrollment by feeder to demonstrate whether the higher annual incentive tier will reach historically underserved populations or concentrate in higher-income, EV dense neighborhoods.

C. EV ACCELERATE AT HOME MODIFICATIONS

The Department responds to the following Notice topic:

Should the Commission approve, modify, or reject Xcel's proposed modifications to its EV Accelerate at Home programs? Please discuss whether the Commission should:

- *Approve the updated tariff sheets.*
- *Approve the updated customer service agreements.*
- *Approve the proposed accounting treatment.*
- *Approve the proposed reporting requirements.*
- *Address any other issues or concerns.*

C.1. Background

C.1.1. Commission Notice Subtopics

In its October 6, 2020 Order, the Commission approved Xcel's Home EV Service Program (now called the EV Accelerate at Home (EVAAH) programs) and the corresponding tariff pages, customer service agreement, proposed accounting treatment, and reporting requirements.³⁵ Xcel's TEP does not include proposed changes to the Company's approved customer service agreement, proposed accounting treatment, or reporting requirements. The Department sent an Information Request (IR) to the Company to confirm that Xcel does not propose changes to those elements, with reference to the

³⁵ In the Matter of Xcel Energy's Petition for Approval of an Electric Vehicle Home Service Program, *Order Approving Electric Vehicle Home Service and Voluntary Electric Vehicle Charger Service Programs as Modified*, October 6, 2020, Docket No. E002/M-19-559, (eDockets) [202010-167089-01](#).

Commission's Notice. The Company responds that it does not propose changes to the accounting treatment or the reporting requirements for the EVAAH programs.³⁶ The Company states that the proposed changes to the EVAAH programs are primarily related to the pricing of the programs, revisions to the peak period times to align to Xcel's new Residential Time of Use (TOU) rate, how net metering customers can participate in the program.³⁷ Xcel states that the changes proposed do not impact the operation of the EVAAH program in a material way, and as such, the existing accounting treatment and reporting requirements are still appropriate for the program.³⁸ The Department concludes the same reasoning is applicable to the Customer Service Agreement; there are no material changes to the service provided to customers that require revision to the existing Customer Service Agreement.

C.1.2. Background on Xcel Proposed Revisions

In its Annual EV Charging Tariffs, Programs and Pilots Report (2025 Annual EV Report) filed in May 2025 for the period ending March 31, 2025, Xcel discusses its EVAAH program offerings.³⁹ Customers have three options under the Company's Residential EVAAH umbrella. The Company's EVAAH Subscription Service allows customers to charge off-peak up to 1,000 kWh per month for a preset monthly fee—which provides off-peak charging and cost certainty. The Company's Pay-As-You-Go option allows customers to pay for energy usage on a per-kWh basis and the cost varies by the time period when charging occurs. Lastly, under the Company's Voluntary Charger Service option, the Company coordinates the installation of Company-owned charging equipment. The program is intended for customers that are already on a time-varying energy rate and the charger is not intended for energy use measurement—energy usage is measured by the residential meter.⁴⁰ The Company states in its 2025 Annual EV Report that, as of March 31, 2025, it has 4,678 customers participating in its various EVAAH programs, representing a 186 percent increase over 2023 participation numbers.⁴¹

In its 2025 TEP, the Company requests modifications to the monthly customer charges for its EVAAH options. Xcel states its monthly charges cover the costs of operations and maintenance for its programs, including charging system equipment maintenance and data services charges.⁴² In its 2025 Annual EV Report, Xcel provides additional clarity, and states that there are changes to the costs of charging equipment because of the shutdown of Enel X operations in North America in late 2024.⁴³ The charging options available to customers participating in were the ChargePoint Home Flex and the Enel X Juicebox 40. The shutdown of Enel X impacted the functionality of the Juicebox 40, and 626 Xcel

³⁶ Xcel Response to DOC IR, IR No. 21, see Attachment A.

³⁷ *Ibid.*

³⁸ *Ibid.*

³⁹ *In the Matter of Xcel Energy's Annual Electric Vehicle Charging Tariffs, Programs, and Pilots Report, 2025 Annual Report*, Xcel Energy, May 30, 2025, Docket Nos. E002/M-15-111, E002/M-17-817, E002/M-18-643, E002/M-19-186, E002/M-19-559, E002/M-20-711, E002/M-20-745, E002/M-21-101, (eDocket) [20255-219454-01](#) (hereinafter: "2025 Annual EV Report"), at 6-15.

⁴⁰ 2025 Annual EV Report, at 6.

⁴¹ *Ibid.*

⁴² 2025 TEP, at 71.

⁴³ 2025 Annual EV Report, at 14.

customers were impacted (322 customers of which were participating in an EVAAH program and the remaining were in the Optimize Your Charge or Multi-Dwelling Unit Pilots).⁴⁴ Customers affected by the shutdown of Enel X were given the opportunity to opt out of the EVAAH program and continue to use their Juicebox 40, or Xcel offered the opportunity to replace customer's Enel X equipment with a ChargePoint charger at no cost to the customer. 50 customers chose to opt-out of the EVAAH program and keep their Enel X equipment, 254 customers opted to switch to a ChargePoint charger, and the Company was unable to reach 18 customers. The customers that were unreachable were opted out per the terms of the EVAAH program's customer service agreement.⁴⁵ Based on the total installed cost of a charger, reported by Xcel in Attachment I to its TEP,⁴⁶ 254 chargers could cost the Company over \$230,000 and this approximation does not include the software or operational challenges/costs of the Enel X shutdown.

The Department requests that Xcel, in reply comments, explain if/how the Enel X shutdown has increased costs for the operation of its EVAAH programs. The Department requests that the explanation include if/how the shutdown of Enel X contributes to the need to increase the monthly customer charges for its EVAAH Subscription Service, Pay-as-You-Go program, and its Voluntary Charger Service.

The Department requests Xcel provide a detailed explanation of the drivers of proposed increase to the EVAAH monthly customer charges including a comparison of the Company's costs and revenues for its EVAAH programs. If Xcel's responses include a spreadsheet(s), the Department requests the excel spreadsheet format be filed with all formulas and equations intact.

The Department withholds a recommendation on the EVAAH program monthly charge revisions pending its review of the information requested from Xcel.

D. COMMERCIAL EV INFRASTRUCTURE REBATE AND ADVISORY PROGRAM

D.1. Summary of Xcel Proposal

Xcel states its Commercial EV Infrastructure Rebate and Advisory Program (Commercial Rebate Program) is a successor program to its Commercial EV Pilot Programs.⁴⁷ The Commercial Rebate Program is designed to expand access to public, fleet, and multifamily charging by offering rebates on electric vehicle supply infrastructure (EVS) equipment and select electric vehicle supply equipment (EVSE) equipment by the installation of Company owned equipment.⁴⁸ Xcel states its pilot findings indicated a need for more flexible offerings for funding and advisory support than what was initially provided in its pilots. The Company intends to file its Commercial Rebate Program as a modification to the Company's 2024-2026 ECO Triennial Plan in January 2026.⁴⁹ Xcel notes that filing for an ECO modification in January 2026 aligns with the timeline of MNDOT's Plan to reopen National Electric

⁴⁴ Id., at 14-15.

⁴⁵ *Ibid.*

⁴⁶ 2025 TEP, at Attachment I.

⁴⁷ 2025 TEP at 54.

⁴⁸ *Ibid.*

⁴⁹ *Ibid.*

Vehicle Infrastructure (NEVI) funding—assumedly making it easier for applicants to take advantage of both funding opportunities.⁵⁰

D.2. ECO Review

The Company states that it intends to file this proposal as a modification to its 2024-2026 ECO Triennial Plan.⁵¹ As the Company intends to file its Commercial Rebate Program as a modification to its ECO plan in January of 2026, the Department does not provide a recommendation regarding compliance with Minn. Stat. § 216B.1615. The Department concludes the Commercial Rebate Program is not a TEP proposal but is rather included in the TEP as an informational, advanced notice of a proposed ECO modification.

Minn. Stat. § 216B.241 Subd. 2(b-c) states:

(b) A public utility shall file an energy conservation and optimization plan by June 1, on a schedule determined by order of the commissioner, but at least every three years. As provided in subdivisions 11 to 13, plans may include programs for efficient fuel-switching improvements and load management. An individual utility program may combine elements of energy conservation, load management, or efficient fuel-switching. The plan must estimate the lifetime energy savings and cumulative lifetime energy savings projected to be achieved under the plan. A plan filed by a public utility by June 1 must be approved or approved as modified by the commissioner by December 1 of that same year.

(c) The commissioner shall evaluate the plan on the basis of cost-effectiveness and the reliability of technologies employed. The commissioner's order must provide to the extent practicable for a free choice, by consumers participating in an energy conservation program, of the device, method, material, or project constituting the energy conservation improvement and for a free choice of the seller, installer, or contractor of the energy conservation improvement, provided that the device, method, material, or project seller, installer, or contractor is duly licensed, certified, approved, or qualified, including under the residential conservation services program, where applicable.⁵²

Regarding modifications to a utility's ECO portfolio, Minn. Rules Chapter 7690.1400 provides:

Upon the commissioner's own motion or upon the motion of a utility or other person, the commissioner may add a new project or modify, expand, or terminate an existing conservation improvement program before the

⁵⁰ *Ibid.*

⁵¹ *Ibid.*

⁵² [Minn. Stat. § 216B.241 subd. 2\(b-c\)](#)

program's expiration date. The moving party must give notice of the motion to the parties on the service list for the affected utility's conservation improvement program. A change may be required to make a project more effective, to reach more participants, to reduce unnecessary or ineffective expenditures, to expand, change, or reduce the geographic area or target group that the project covers, or to change the time period during which the project would be in effect. For a new project modification or an existing project termination, whether by a utility or an interested party, the filing requirements and the review and decision process are specified in part [7690.1430](#). For other program changes, the department shall allow 15 days for written comments on the proposal. The time period allowed for written comments begins on the date that the proposed change is filed with the department. The department shall allow ten days from the filing of the comments for written reply comments. These proposed program changes, comments, and responses must be filed with the Public Utilities Commission, the department, and interested parties on the utility's conservation improvement service list. The commissioner shall issue a written decision, including the commissioner's reasons for the decision, within 35 days from the date reply comments are due.⁵³

The Department required additional information from the Company in order to better understand Xcel's Commercial Rebate Program and its appropriateness for inclusion in its current ECO plan. As such, the Department issued an IR 38 requesting the Company describe how the Commercial Rebate Program will qualify as an efficient fuel-switching (EFS) program within ECO. The Department asked the Company to specify how the Commercial Rebate Program will meet the necessary EFS technical criteria listed in Minnesota Statutes 216B.241 Subdivision 11(d) and how the program will adhere to the Department of Commerce's EFS Technical Guidance.⁵⁴

The Company states in response to Department IR 38 that although it continues to prepare specific technical analysis for its proposed ECO modification filing, the program will adhere to the EFS requirements in Minn. Stat. § 216B.241 Subd. 11(d)⁵⁵ as well as adhere to the Department's EFS Technical Guidance. The Company states that the Commercial Rebate Program is focused on market transformation and will be a direct impact program that provides incentives for public charging. According to the Company's response, the Company plans to claim gasoline savings from the projects under the Commercial Rebate Program, as the programs would enable new charging for existing and new EVs.⁵⁶ The Company expects the program will meet the statutory requirements for cost effectiveness under the Minnesota Cost Test. The Company states a full screening of the statutory requirements and the Department's technical guidance will be provided in the Company's ECO filing

⁵³ [Minn. Rules Ch. 7690.1400](#)

⁵⁴ Xcel response to Department IR 38, in Attachment B.

⁵⁵ [Minn. Stat. § 216B.241, subd. 11\(d\)](#) (2025).

⁵⁶ Xcel response to Department IR 38, in Attachment B.

along with Deemed Sheets and forecast technical assumptions for the measure the Company seeks to incentivize—in the same format as the Company’s Appendix 3 from its 2024-2026 ECO Triennial.⁵⁷

The Company’s response to IR 38, as stated by the Company, is preliminary as the Company continues to prepare specific technical analysis for its ECO modification filing.⁵⁸ The Commercial Rebate program will require a fulsome review by the Department to determine if the program is approvable as an efficient fuel-switching program within the Company’s ECO portfolio. Upon the filing of its ECO modification, the Department will review the Company’s proposed budget and the cost-effectiveness of the proposal, as well as the Company’s full compliance with the statutory and technical requirements necessary to introduce a new program into the Company’s ECO portfolio. As established in Minn. Stat. §216B.241 and Minn. Rules ch. 7690, the jurisdiction for review of an ECO modification lies with the Department. If approved for inclusion in the Company’s ECO portfolio, the Commercial Rebate Program will be subject to the reporting requirements of ECO.

D.2.1. Conclusion

The Department concludes that the Commercial Rebate Program is not subject to Commission decision in this proceeding, but is included in the TEP as an informational, advanced notice of a proposed ECO modification. The Department does not provide an ultimate recommendation on the Commercial Rebate Program under Minn. Stat. § 216B.1615, as a more fulsome review under the relevant statute will be required when the ECO modification is filed in January 2026, as the Company plans.

The Department recommends Xcel provide, in reply comments, the status of its Commercial EV Infrastructure Rebate and Advisory Program ECO modification filing.

E. RESIDENTIAL ADVISORY SERVICES AND GUIDED CHARGING INSTALLATION PROGRAM

E.1. Summary of Xcel Proposal

Xcel proposes to revamp its Residential Advisory Services as well as add a Guided Charging Installation Program in its TEP.⁵⁹ The Company plans to more sharply focus on helping its customers strategically plan and execute EV charging initiatives. The Company plans to phase out tools and resources that do not fit its sharper focus and introduces the Guided Charging Installation Program. The Company plans to prioritize home charging education for its Residential Advisory Service and Guided Charging Installation Program.⁶⁰

Regarding its Guided Charging Installation Program, Xcel states:

⁵⁷ *Ibid.*

⁵⁸ *Ibid.*

⁵⁹ 2025 TEP, at 58-61

⁶⁰ *Id.*, at 58-59.

Company plans to launch a Guided Charging Installation Program which will provide a single, flexible educational pathway on our website designed to accommodate varying levels of engagement. Starting from the Company's EV homepage, this pathway will provide comprehensive information and digital tools in a decision-making flow that will support customers throughout their charging planning and implementation journey. Importantly, customers may engage with the online pathway at their own pace and are not obligated to proceed through all stages. For example, those who prefer early research may choose to stop once they have received a fully digital home electrical evaluation and detailed charging installation plan knowing what they now need to install home charging equipment once they are ready to purchase an EV. Those that want charging installed quickly can proceed to scheduling. This approach ensures that all customers—regardless of their timeline or level of readiness—have access to relevant, actionable resources that support informed EV adoption and charging decisions.⁶¹

The Company states customers will be able to submit information about their home through a trusted third-party digital platform in order to receive a no-obligation quote that outlines necessary electrical upgrades, such as panel modification, breaker replacements, wiring requirements, and household load calculations, tailored to their preferred charging setup.⁶² If the customer wishes to proceed, the program will allow the customer to proceed to schedule installation, either through the existing EVAAH program or a customer-paid alternative. The customer will be informed throughout the process of applicable rebates for panel and/or home wiring rebates and will be invited to participate in Charging Perks.⁶³

The Company states its Guided Charging Installation Program will directly address barriers to home charging. Xcel expects the program to enhance overall EV adoption and ensure customers are equipped with the resources necessary to make informed, cost-effective, and grid-aligned charging decisions.⁶⁴

Outside of its Guided Charging Installation Program, the Company states its Residential Advisory Services will include the following components: paid search/media, events, support for auto dealers and email campaigns. The Company's email campaigns will direct people to the Company's EV website to access the Company's educational resources and tools as well as additional links to external resources.⁶⁵ Xcel's research currently suggests focusing its educational materials and other resources on the following (subject to change):

⁶¹ *Id.*, at 59.

⁶² *Id.*, at 60.

⁶³ *Ibid*; Note: Charging Perks is subject to Commission Decision in the present docket.

⁶⁴ *Ibid.*

⁶⁵ 2025 TEP, at 60.

- Public Charging
- Charging Economics and EV rates
- Environment and Grid Readiness
- EV Charging Tips & Tricks
- Home Electrical information as it relates to EV Charging

E.2. ECO Review

Similarly to the Company's Commercial Rebate Program, the Company intends to file its Residential Advisory Services and Guided Charging Installation Program as a modification to its 2024-2026 ECO Plan. The Company intends to file the modification in January of 2026.⁶⁶ As with the Commercial Rebate program, the Department did not evaluate this program for compliance with Minn. Stat. § 216B.1615. The Department concludes the Residential Advisory Services and Guided Charging Installation Program is not a TEP proposal but rather included in the TEP as informational, advance notice of a proposed ECO modification.

The Department required additional information from the Company in order to better understand Xcel's Residential Advisory Services and Guided Charging Installation Program's appropriateness for ECO Review. The Department sent an ECO related information request to the Company. In its ECO IR, the Department requested the Company describe how the Residential Advisory Services and Guided Charging Installation Program will qualify as an efficient fuel-switching program within ECO. The Department asked the Company to specify how the Residential Advisory Services and Guided Charging Installation Program will meet the necessary EFS technical criteria listed in Minnesota Statutes 216B.241 Subdivision 11(d) and adhere to the Department of Commerce's EFS Technical Guidance.⁶⁷

The Company responded to Department IR 38 stating that although the Company continues to prepare specific technical analysis for its ECO modification filing, the Residential Advisory Services and Guided Charging Installation Program will adhere to the EFS requirements in Minn. Stat. 216B.241 subdivision 11(d) as well as the Department's EFS Technical Guidance. The Company states that its Residential Advisory Services and Guided Charging Installation program is intended to be an indirect impact EFS program covering education and marketing delivery methods that the Company has historically offered to customers. The Company states that the Guided Charging Installation Program element will provide customers with a single, flexible educational pathway on its website to learn about home charging options. The Company states that because the Residential Advisory Services and Guided Charging Installation Program is not intended to provide direct savings, it will not have to meet the technical or statutory requirements of a direct impact program.⁶⁸

The Department appreciates the Company's response to Department IR 38. As stated by the Company, the technical review as to how the proposal will meet the statutory and technical requirements of an

⁶⁶ *Id.*, at 61.

⁶⁷ Xcel Response to Department IR 38, in Attachment B. *See also*, [Minn. Stat. § 216B.241, subd. 11\(d\)](#) (2025).

⁶⁸ *Ibid.*

ECO program is preliminary at this time. The Department will need to conduct a fulsome review of the Residential Advisory Services and Guided Charging Installation Program at the time the modification is filed to determine if it is suitable for inclusion in the Company's ECO portfolio as an efficient fuel-switching program. Upon the filing of its ECO modification, the Department will review the Company's proposed budget and the cost-effectiveness of the proposal, as well as the Company's compliance with the statutory and technical requirements necessary for introducing a new program into the Company's ECO portfolio. As established in Minn. Stat. § 216B.241 and Minn. R. Ch. 7690, the jurisdiction for review of an ECO modification lies with the Department. If approved for inclusion in the Company's ECO portfolio, the Residential Advisory Services and Guided Charging Installation Program will be subject to the reporting requirements of ECO.

E.2.1. Conclusion

The Department concludes that the Residential Advisory Services and Guided Charging Installation Program is not subject to Commission decision in this proceeding, but is included in the TEP as an informational, advance notice of a proposed ECO modification. The Department does not provide an ultimate recommendation on the Residential Advisory Services and Guided Charging Installation Program under Minn. Stat. § 216B.1615, as a more fulsome review under the relevant statute will be required when the ECO modification is filed in January 2026, as the Company plans.

The Department recommends Xcel provide, in reply comments, the status of its Residential Advisory Services and Guided Charging ECO modification filing.

F. CHARGING PERKS ACTIVE MANAGED CHARGING PROGRAM

The Department responds to the following notice topic:

Should the Commission approve, modify, or reject Xcel's proposed actively managed charging program, Charging Perks? Please discuss whether the Commission should:

- *Approve the updated tariff sheets.*
- *Approve the updated customer service agreements.*
- *Approve the proposed accounting treatment.*
- *Approve the proposed reporting requirements.*
- *Address any other issues or concerns.*

F.1. Commission Notice Subtopics

The Company proposes its Charging Perks Active Managed Charging Program (Charging Perks) to replace its Optimize Your Charge Pilot (OYC Pilot).⁶⁹ The Charging Perks program represents Xcel Energy's transition from passive to active managed charging. The program is designed to replace the

⁶⁹ 2025 TEP, at 61.

OYC Pilot with a more sophisticated system that allows the Company to directly manage EV charging schedules to support grid reliability and renewable energy integration. On March 15, 2022, the Commission approved Xcel's OYC Pilot in Docket No. E002/M-21-101.⁷⁰ The OYC Pilot sought to manage the grid impacts of EVs by working with customers to schedule charging based on a customer's preferred schedule that ensures charging outside of the Company's system peak. The pilot was available for residential and commercial customers.⁷¹ In exchange for the customer's participation, the customer received a total incentive of \$50 per year for each EV that was in enrolled in the program—the credit is administered as a \$4 monthly credit on the customer's bill.⁷² The term length of the OYC Pilot was 3-years.⁷³ However, on February 28, 2025, Xcel filed a request to remove the language from its tariff specifying the end date for the OYC Pilot until a permanent successor program was proposed and potentially approved.⁷⁴ In its supplemental letter requesting the tariff modification, the Company stated the proposed successor program would be proposed in the Company's 2025 TEP.⁷⁵ The Commission approved Xcel's request to remove the sunset date of the OYC Pilot.⁷⁶

Within its petition for approval of the OYC Pilot, the Company included its terms and conditions for the rate and its preferred accounting treatment.⁷⁷ Within the Order approving the OYC Pilot, the Commission required Xcel file tariff pages reflecting final EV pilot rates, terms, and conditions within 30 days of Order issuance.⁷⁸ It is reasonable to assume a replacement program will require changes to the same elements. The Commission, through the 2025 TEP Notice, asked stakeholders to address whether the Commission should approve the following:

- The updated tariff sheets.
- The updated customer service agreements.
- The proposed accounting treatment.⁷⁹

As these elements were not including in Xcel's 2025 TEP, the Department sent an IR to the Company to request updated tariff sheets, updated customer service agreements, and the Company's proposed

⁷⁰ *In the Matter of Xcel Energy's Petition for Load Flexibility Pilot Programs and Financial Incentive, Order Approving Modified Load-Flexibility Pilots and Demonstration Projects, Authorizing Deferred Accounting, and Taking Other Action*, March 15, 2022, Docket No. E002/M-21-101, (eDockets) [20223-183794-01](#).

⁷¹ *In the Matter of Xcel Energy's Petition for Load Flexibility Pilot Programs and Financial Incentive*, Petition, Xcel Energy, February 1, 2021, Docket No. E002/M-21-101, (eDockets) [20212-170579-01](#), at 11.

⁷² *Id.*, at 33.

⁷³ *Id.*, at 35.

⁷⁴ *In the Matter of Xcel Energy's Petition for Load Flexibility Pilot Programs and Financial Incentive*, Supplemental Letter, Xcel Energy, February 28, 2025, Docket No. E002/M-21-101, (eDockets) [20252-215896-01](#).

⁷⁵ *Id.*, at pdf 7.

⁷⁶ *In the Matter of the Petition for Load Flexibility Pilot Programs and Financial Incentive Mechanism, Order*, October 28, 2025, Docket No. E002/M-21-101, (eDockets) [202510-224354-01](#).

⁷⁷ *In the Matter of Xcel Energy's Petition for Load Flexibility Pilot Programs and Financial Incentive Mechanism*, Petition, Xcel Energy, February 1, 2021, Docket No. E002/M-21-101, (eDockets) [20212-170579-01](#), at 29.

⁷⁸ *In the Matter of Xcel Energy's Petition for Load Flexibility Pilot Programs and Financial Incentive Mechanism, Order Approving Modified Load-Flexibility Pilots and Demonstration Projects, Authorizing Deferred Accounting, and Taking Other Action*, March 15, 2022, Docket No. E002/M-21-101, (eDockets) [20223-183794-01](#), at 28.

⁷⁹ Notice.

accounting treatment. The Company responded to Department IR 22 that it is not proposing any tariffs related to the Charging Perks program. Xcel provided a draft of the Charging Perks program Terms and Conditions, subject to revision based on the ultimate Commission decision, as Attachment A to Department IR 22. Further, Xcel clarified its intended cost recovery mechanism: because the Company intends to seek recovery in a future rate case, the Company is not asking for a specific accounting treatment. The Company states that all the anticipated costs for Charging Perks will be classified as Operations and Maintenance costs and there will be no revenues from the program to be accounted for.⁸⁰

The Department addresses each of the Notice subtopics as well as the program's compliance with Minn. Stat. § 216B.1615 in the sections below.

F.2. Program Overview and Incentive Structure

The Charging Perks program is a direct successor to Xcel's OYC Pilot, which was a passive managed charging pilot. Charging Perks utilizes an active managed charging architecture in which Xcel, through agreements with software providers and OEMs, directly transmits charging schedules to participating EVs or Level 2 chargers. This system replaces customer-driven charging times with automated, vendor-controlled schedules designed to align with specific grid objectives while attempting to meet a customer-specified "ready-by" time. Participants are categorized into two distinct tiers based on their geographic location on the electrical grid: Standard Customers, who receive a \$50 one-time enrollment bill credit and a \$25 annual participation reward, and Distribution Optimized Customers, who are served by constrained feeders⁸¹ and receive a \$50 enrollment credit along with a higher \$75 annual reward.⁸² Enrollment is validated through the Smart Charging Provider, and participants must plug in their vehicle at their home address at least twice per month to remain eligible for incentives. Xcel states that it is assuming 30 percent of customers would qualify for classification as distribution optimized customers based on a similar program in Colorado.⁸³ The Petition lacks evidentiary basis or supporting analysis justifying the selection of the specific incentive amounts. The Department recommends that Xcel review the proposed incentive amount to determine the optimal incentive level needed to achieve the participation rates necessary to defer distribution upgrades.

Xcel states the goal of Charging Perks is to transition from the OYC Pilot to a more holistic and cost-effective managed charging portfolio. The Company states that Charging Perks will leverage the data infrastructure and vendor networks of OYC Pilot and expand on the grid services that the program provides through active charging management.⁸⁴ Xcel states that by expanding control strategies through active managed charging, the program can provide a broader range of grid benefits for similar costs as OYC.⁸⁵ The Company states:

⁸⁰ Xcel Response to Department IR 22, see Attachment C.

⁸¹ Xcel Response to Department IR 42, see Attachment D for feeder criteria.

⁸² 2025 TEP, at 63.

⁸³ Xcel Response to Department IR 42, see Attachment D.

⁸⁴ 2025 TEP, at 61.

⁸⁵ *Id.*, at 62.

Whereas OYC and other passive managed charging solutions can avoid bulk system peaks through price signaling, Charging Perks is capable of alleviating localized system constraints at the feeder and transformer levels. By dispatching customized control strategies to program participants based on the load profiles of distribution assets serving them, the program can defer asset upgrades, thus avoiding system costs and increasing program value. The program is designed to provide a benefit to participants based on the relative grid value they provide. Customers that are served by heavily constrained areas of the grid that enroll in Charging Perks have the potential to provide greater value to the grid in the form of avoided distribution investment. They provide this value by shifting charging away from distribution asset peaks and deferring upgrades to those assets. Customers that are able to benefit the distribution system can also be controlled to avoid generation and transmission, or bulk system, peaks thus providing greater value than customers served by less constrained parts of the grid.⁸⁶

The transition to Charging Perks represents a technological and operational leap for Xcel Energy. Moving from the passive price signals of the OYC Pilot to active, automated dispatch is necessary to integrate high penetrations of renewable energy and manage distribution constraints. However, the reliance on third-party telematics and the introduction of location-based compensation introduces reliability and transparency risks that require careful regulatory scrutiny. For example, in Xcel's 2025 Annual EV Report, the Company states it had ongoing operational challenges for its OYC Pilot in getting customers fully connected to the program's software—as of the filing of the 2025 Annual EV Report, there were 911 customers pending completion of their application with ChargePoint or WeaveGrid.⁸⁷ As the OYC Pilot scaled, Xcel stated it experienced “some administrative challenges related to the database that captures charging session data. The Company is developing enhancements to our technical capabilities, including scoping a new database, to address this operational challenge.”⁸⁸

As the Company discusses that the Charging Perks program will utilize the same software vendors as the OYC Pilot, the Department is concerned the administrative and operational challenges experienced with the OYC Pilot will persist and affect Charging Perks.

The Company states in its TEP that it is developing data tools to allow enrollment in managed charging based on only a customer's address and contact information, which would reduce the data entry needs by the customer at the front-end. The functionality should be available when the Charging Perks program is launched in Minnesota.⁸⁹ It is unclear if the Company's proposed data tools are a solution to all the administrative and operational challenges cited in the Company's 2025 EV Annual Report.

⁸⁶ *Id.*, at 63.

⁸⁷ 2025 Annual EV Report, at 17.

⁸⁸ *Ibid.*

⁸⁹ 2025 TEP, at 65.

The Department requests Xcel, in reply comments, explain how it is working to address the administrative and operational challenges cited in its 2025 Annual EV Report including an approximate timeline as to when the challenges will be fully addressed.

F.3. Charging Perks' Value Proposition: Managed Charging

The strategic value of Charging Perks arises from its capacity to provide localized grid relief and enhanced integration of DERs. By actively managing EV load on constrained feeders, the Company aims to reduce peak demand on local transformers and feeders, thereby deferring capital-intensive grid infrastructure upgrades that would otherwise be required to support unmanaged EV charging. Furthermore, the software-driven optimization aligns EV charging sessions with periods of high wind and solar generation, thereby minimizing renewable energy curtailment and maximizing the use of low-carbon energy. These operational efficiencies are intended to generate system-wide benefits that lower the cost of electric service for all ratepayers, as shifting load to off-peak periods improves the utilization of existing grid assets. The program also includes an emergency demand response feature, which would allow Xcel to request a one-to-two-hour pause in charging during rare grid stability events.

Findings from the Colorado Charging Perks Pilot⁹⁰ suggest that the traditional overnight charging window (midnight to 6 AM) is increasingly obsolete as utility-scale solar generation grows.⁹¹ Reliance solely on overnight charging can lead to higher emissions during calm nights when wind generation is low and fossil fuel baseload is dominant. To maximize grid and environmental value, managed charging must dynamically shift load toward daytime solar peaks and windy nighttime periods. Additionally, transparency via a public Application Program Interface (API) is necessary to allow third-party software to automate and scale these clean-energy responses.

The Department requests that Xcel, in reply comments, discuss the feasibility of incorporating daytime charging windows into its managed charging algorithms to leverage utility-scale solar generation and designing logic to shift load away from 'calm' (low-wind) nighttime periods.

Significant operational gaps exist within the 2025 TEP, primarily with technological exclusion and the transfer of costs and risks to the participant. Currently, the program's hardware requirements exclude approximately 54% of light-duty EVs on the road because they lack the OEM-integrated communication protocols required by Xcel Energy's software vendors.⁹² Customers that do qualify for the program are required to bear all secondary expenses, including the costs of home internet connectivity and any manufacturer-specific subscription services necessary for the vehicle to communicate with the Smart Charging Provider. Furthermore, the program terms provide no guarantee that a vehicle will reach a full or desired state of charge by the designated "ready-by" time, and the customer assumes all responsibility for ensuring the vehicle has sufficient energy for its intended use. Participation is also strictly contingent on maintaining an annual "opt-out" rate—defined

⁹⁰ [Xcel Energy Colorado Charging Perks Pilot Evaluation, Guidehouse Inc. March 4, 2024.](#)

⁹¹ [Xcel Energy Colorado Charging Perks Proxy Signal 60-Day Notice Summary Report, December 20, 2024.](#)

⁹² 2025 TEP, at 62.

as the percentage of time a customer overrides the managed schedule—of 20% or less; exceeding this threshold allows Xcel Energy to terminate the customer’s enrollment immediately and withhold unearned rewards.

The Department requests that Xcel, in reply comments, discuss the feasibility of a hardware-neutral integration tier, which should allow customers with incompatible vehicles to participate by using networked EVSE and open communication standards, thereby mitigating the technical limitation of any single software vendor.

*F.4. Statutory Criteria – Review and Implementation*⁹³

F.4.1. Minn. Stat. § 216B.1615, subd. 3(1)

Minn. Stat. § 216B.1615, subd. 3(1) requires Commission consideration of whether the TEP proposals are reasonably expected to “improve the operation of the electric grid.”

The Charging Perks proposal utilizes software to access vehicle charging data and directly manage participants’ charging schedules to shift EV charging electricity consumption away from system peaks.⁹⁴ The Company states that by expanding its control strategies from the passive managed charging capabilities of OYC, the program can provide greater grid benefits.⁹⁵ The Company states that Charging Perks is capable of alleviating localized system constraints at the feeder and transformer levels, whereas more passive models, like OYC, only work to shape charging behavior through price signaling.⁹⁶

In its 2019 EV Inquiry Order, the Commission recognized that active management is additive to rate design toward the cost-effective integration of EVs on to the electric system:

Smart or managed charging takes rate design a step further by enabling the utility to actively manage the charging load. Chargers can be equipped with two-way communication capabilities between the utility and the EV, which allows the utility to remotely control the rate of EV charging in order to meet a local or regional system need. For example, the utility could ramp up EV charging during times of high wind generation, and the utility could curtail charging during peak demand in areas with high EV penetration to defer the need for distribution infrastructure upgrades.⁹⁷

The Department concludes that Charging Perks satisfies this criterion.

⁹³ [Minn. Stat. § 216B.1615, subd. 3](#) (2023).

⁹⁴ 2025 TEP, at 62.

⁹⁵ *Ibid.*

⁹⁶ *Id.*, at 62-63.

⁹⁷ EV Inquiry Order at 5.

F.4.2. Minn. Stat. § 216B.1615, subd. 3(2)

Minn. Stat. § 216B.1615, Subd. 3(2) requires Commission consideration of whether the TEP proposals are reasonably expected to “increase access to the use of electricity as a transportation fuel for all customers, including those in low- and moderate-income communities, rural communities, and communities most affected by air emissions from the transportation sector.”

Charging Perks seeks to promote managed charging through an incentive structure that provides higher rewards for customers on distribution-optimized feeders. However, the Department identifies significant limitations regarding equitable access. The program’s hardware requirement excludes approximately 54% of light-duty EVs on the road that lack specific communication protocols, and participants must bear secondary costs such as manufacturer subscription services.⁹⁸ The Department finds that the Company’s residential programs often reflect persistent residential under-reach, with EVAAH and OYC Pilot uptake rates as low as 4% to 10% in high-poverty tracts and communities of color.

F.4.3. Minn. Stat. § 216B.1615, subd. 3(3)

Minn. Stat. § 216B.1615, subd. 3(3) requires Commission consideration of whether the TEP proposals are reasonably expected to “increase access to publicly available electric vehicle charging for all types of electric vehicles.”

The Charging Perks program pertains exclusively to private, residential charging and does not include public infrastructure investments. The Department does not identify any public interest consideration related to this criterion for this specific program.

F.4.4. Minn. Stat. § 216B.1615, subd. 3(4)

Minn. Stat. § 216B.1615, subd. 3(4) requires Commission consideration of whether the TEP proposals are reasonably expected to “support the electrification of medium-duty and heavy-duty vehicles and associated charging infrastructure.”

Charging Perks is designed for residential customers and light-duty passenger vehicles. Because the proposal does not target commercial fleets or larger vehicle classes, the Department finds that this criterion does not provide a relevant public interest basis for evaluating this specific program.

F.4.5. Minn. Stat. § 216B.1615, subd. 3(5)

Minn. Stat. § 216B.1615, subd. 3(5) requires Commission consideration of whether the TEP proposals are reasonably expected to “reduce statewide greenhouse gas emissions, as defined in section 216H.01, and emissions of other air pollutants that impair the environment and public health.”

⁹⁸ 2025 TEP, at 62.

The Charging Perks program is designed to align EV charging sessions with periods of high renewable generation, specifically wind and solar. The software-driven optimization helps maximize the use of low-carbon generation while minimizing renewable curtailment.⁹⁹ The Commission had previously established that transportation electrification can reduce statewide GHG and environmentally harmful emissions, particularly as it coincides with the decline in coal-fired generation.¹⁰⁰ Through active management of load to improve the utilization of existing carbon-free grid assets, Charging Perks can be reasonably expected to further the public interest in clean energy and public health.

However, the Department emphasizes that the environmental benefits are contingent on high participation rates. If more than half of EVs are technically excluded from the program due to telematics requirements, the potential for statewide emission reductions is significantly hampered.

F.4.6. Minn. Stat. § 216B.1615, subd. 3(6)

Minn. Stat. § 216B.1615, subd. 3(6) requires Commission consideration of whether the TEP proposals are reasonably expected to “stimulate nonutility investment and the creation of high-quality jobs for local workers.”

Charging Perks utilizes existing home charging equipment and software, which typically does not require new electrical installations or qualified electrician services beyond what is already established in the home. The Department identifies a limited public interest benefit under this criterion, as the program focuses on software-driven load management rather than the physical construction of new infrastructure that would drive local job creation.

F.4.7. Minn. Stat. § 216B.1615, subd. 3(7)

Minn. Stat. § 216B.1615, subd. 3(7) requires Commission consideration of whether the TEP proposals are reasonably expected to “educate the public about the benefits of electric vehicles and related infrastructure.”

The Charging Perks program does not directly pertain to educating the public about the benefits of EVs and related infrastructure, therefore the Department does not identify any public interest consideration related to this statutory criterion.

F.4.8. Minn. Stat. § 216B.1615, subd. 3(8)

Minn. Stat. § 216B.1615, subd. 3(8) requires Commission consideration of whether the TEP proposals are reasonably expected to “be transparent and incorporate reasonable public reporting of program activities, consistent with existing technology and data capabilities, to inform program design and commission policy with respect to electric vehicles.”

⁹⁹ 2025 TEP, at 66.

¹⁰⁰ EV Inquiry Order, at 9.

The Company proposes several reporting requirements for the Charging Perks program.¹⁰¹ The Department proposes annual reporting for the program in both the present docket and in the Company's EV Annual Report. The Department also proposes additional annual reporting requirements in section F.6. of the present comments. Through the combined reporting requirements (proposed by the Company and recommended by the Department), the Department concludes that Xcel will provide reasonable public reporting on its Charging Perks program. Accordingly, the Department finds Charging Perks meets this criterion.

F.4.9. Minn. Stat. § 216B.1615, subd. 3(9)

Minn. Stat. § 216B.1615, subd. 3(9) requires Commission consideration of whether the TEP proposals are reasonably expected to “reasonably balance the benefits of ratepayer funded investments in transportation electrification and impacts on utility rates.”

The Charging Perks program budget is relatively low at approximately \$4.2 million and consists only of customer credits and the costs of operating and maintaining the program. The costs of the program are largely driven by the data access fees charged by the OEMs to software vendors which are then passed through to the Company.¹⁰² Furthermore, the intent of the program is to determine the optimal program size, program structures and technology investment necessary to integrate EV load into the Company's system in way that maximizes the potential for EVs to positively impact the system.¹⁰³ The operational efficiencies of managed charging are intended to generate system-wide benefits that lower the cost of electric service for all ratepayers, as shifting load to off-peak periods improves the utilization of existing grid assets. The program also includes an emergency demand response feature, allowing Xcel to request a one-to-two-hour pause in charging during rare grid stability events.

The Commission has found transportation electrification to be in the public interest. Given that EV charging loads, at high levels of EV adoption, have the potential to shift system level peaks,¹⁰⁴ it is crucial to investigate how best to integrate EVs on to the system cost-effectively—hopefully avoiding infrastructure upgrades and impacts on all ratepayers. The Department concludes Charging Perks addresses this criterion.

F.4.10. Minn. Stat. § 216B.1615, subd. 3(10)

Minn. Stat. § 216B.1615, subd. 3(10) requires Commission consideration of whether the TEP proposals are reasonably expected to “appropriately balance the participation of public utilities and private enterprise in the market for transportation electrification and related services.”

The Company does not propose to own and capitalize on the customers' charging infrastructure but allows the customer to buy and install a participating charger through the contractor of their choice. By

¹⁰¹ 2025 TEP, at 67.

¹⁰² *Id.*, at 62.

¹⁰³ *Id.*, at 64.

¹⁰⁴ *Ibid.*

not limiting the customer to only Xcel-owned infrastructure, the Company does not encroach on services/products that can be well provided by private enterprise. Therefore, the Department concludes Charging Perks satisfies this criterion.

F.5. Tariff Sheets and Customer Service Agreement

In response to Department IR 22, Xcel states that it does not propose tariff sheets for the Charging Perks program. The Department followed up with an additional IR to determine the Company's reasoning. In response to Department IR 40, the Company states that it does not intend to propose tariff sheets for Charging Perks because it views this program similarly to its other demand response programs (e.g. Saver Switch and A*C Rewards) that operate with a comprehensive Customer Service Agreement as their governing document. The Company indicated this approach allows the Company a level of operational flexibility as the Company continues to develop its program and gather learnings.¹⁰⁵

The Charging Perks Program is slated to replace the OYC Pilot, as discussed above. Within the Order approving the OYC Pilot, the Commission required Xcel to file tariff pages reflecting final EV pilot rates, terms, and conditions within 30 days of Order issuance.¹⁰⁶ Filing tariff pages to reflect new rates is common practice for new utility programs and provides the Commission, stakeholders, and ratepayers with crucial information regarding the operation of a program or rate. A Company's publicly available rate book is an important reference for ratepayers that can be used to compare the rates and programs available to them. Furthermore, a tariffed program allows for regulatory oversight of program modifications, as modifications to a tariff require Commission approval. The Department acknowledges that the tariff pages provided in reply comments will be drafts subject to revision based on the Commission's ultimate decision in this proceeding.

The Department requests Xcel, in reply comments, provide draft tariff sheets for its Charging Perks program.

The Department reviewed Xcel's proposed Customer Service Agreement and finds it to be consistent with the Company's proposal. However, the Department is concerned by the lack of commitment from the Company that the customer's vehicle will reach a full or desired state of charge by the designated "ready-by" time as the customer assumes all responsibility for ensuring the vehicle has sufficient energy for its intended use, as discussed above in section F.2.

The Department requests the Company, in reply comments, discuss in greater detail how it intends to operate Charging Perks to meet participants' "ready-by" time and at what level of consistency.

¹⁰⁵ Xcel Response to Department IR 40, see Attachment E.

¹⁰⁶ *In the Matter of Xcel Energy's Petition for Load Flexibility Pilot Programs and Financial Incentive Mechanism. Order Approving Modified Load-Flexibility Pilots and Demonstration Projects, Authorizing Deferred Accounting, and Taking Other Action.* March 15, 2022, Docket No. E002/M-21-101, (eDockets) [20223-183794-01](#), at 28.

F.6. Cost Recovery – Minn. Stat. §216B.1615, subd. 4

Minn. Stat. § 216B.1615, subd. 4 states:

Notwithstanding any other provision of this chapter, the commission may approve cost recovery under section 216B.16, including an appropriate rate of return, of any prudent and reasonable investments made or expenses incurred by a public utility, including rebates for the installation of electric vehicle infrastructure, to administer and implement an approved transportation electrification plan.¹⁰⁷

Xcel proposes to recover the costs of Charging Perks through a future rate case, rather than through the Energy Conservation and Optimization (ECO) statute used for the Commercial EV Rebate and the Residential Advisory Services and Guided Charging Installation Program. When seeking future cost recovery in a rate case, a cost cap on the total program cost would place the burden on the Company to justify any cost overruns that would be charged to Minnesota ratepayers.

The Department recommends the Commission set a cost cap set at the budget approved by the Commission.

F.7. Reporting Requirements

The Company proposes tracking and reporting on the following metrics:

- Program market penetration (% of EV's in the service territory that are controlled)
- Break out of participation by optimization schedule (standard customers vs. distribution optimized)
- Avoided generation costs by customer
- Avoided transmission and distribution cost by customer
- Program costs broken out into the following categories
 - Vendor costs
 - Customer incentives
 - Operating costs
- Cumulative bill impacts of the program¹⁰⁸

The Company does not propose a reporting schedule, nor where the reporting will occur. Furthermore, as the Company is in the learning and data gathering phase of implementing its Charging Perks program, the Department concludes additional reporting is necessary to evaluate the program for customer satisfaction and scalability.

¹⁰⁷ [Minn. Stat. § 216B.1615, Subd. 4](#)

¹⁰⁸ 2025 TEP at 67.

The Department recommends the Commission require Xcel to report on its program yearly and in both the present docket, as well as the Company's Annual EV Report.

The Department recommends the Commission approve Xcel's reporting requirements, as well as the following additional annual reporting requirements for the Charging Perks program:

- The rate at which the Company met the participants' "ready-by" time,
- Customer satisfaction with the program,
- The opt-out rate for the program broken out into the following categories,
 - Involuntary customer opt-out for not meeting the terms and conditions of the program,
 - Voluntary customer opt-out.
- Whether any additional vehicles or charger models are eligible to participate in the program, including a discussion of the approximate percentage of vehicles on the road eligible to participate in the program.
 - If additional data access fees have been incurred to allow greater vehicle or charger model eligibility and participation,
 - How the additional data access fees have impacted program costs.

F.8. Closure of OYC Pilots – Tariff Modification

Xcel proposes to formally close the OYC Pilots to new customers upon the approval and launch of Charging Perks. The Company has previously filed a request to remove the sunset date for the OYC Pilot to ensure continuity until a permanent successor was established. The Department finds that the closure of the pilot to new enrollment is a reasonable step once a permanent program is in place. However, the Department emphasizes that this closure should be contingent on the Commission's final decision regarding the successor program.

The Department acknowledges that the proposed Charging Perks program proposes a different incentive structure than OYC, featuring a one-time enrollment credit and annual rewards. To prevent customer confusion and ensure a fair transition, the Department requests Xcel, in reply comments, provide a detailed transition timeline for OYC Pilot participants, including how they will be notified of the pilot closure and the specific process for opting into the new incentive structure. The Department further requests Xcel describe the communication strategy for participants ineligible to enroll in Charging Perks due to vehicle or charging compatibility issues.

F.9. Conclusion

The Department withholds its final recommendation on the Charging Perks program pending review of the additional information requested from Xcel.

G. PROPOSED TARIFF CHANGES

The Department responds to the following notice topic:

Should the Commission approve, modify, or reject Xcel's related energy rate and monthly customer charge program modifications?

The Department addresses the Energy Rate modification below, as requested by the Notice Topic. The Department also addresses Xcel's proposed tariff modification for the closure of the EV pilots to new customers and Xcel's proposed modification to allow net-metered customers to participate in EV programs.

G.1. Energy Rate – Aligning with Residential TOU Rates

Xcel proposes to align the energy rates and time-of-use (TOU) Rate Periods of its EV programs with the recently approved Residential TOU rate periods in Docket No. E002/M-23-524. Historically, states Xcel, its EVAAH programs and its multi-dwelling unit pilots have used the same pricing as its residential TOU rates.¹⁰⁹ The Company states that it previously proposed a similar tariff revision which was denied without prejudice by the Commission. In its May 15, 2025 Order, the Commission denied Xcel's proposed request to update its residential electric vehicle rates to align with the TOU approved within the Order, stating the Commission:

will deny the Company's request to update its residential electric vehicle rates to align with the time-of-use rates approved herein. Instead, the Company will be further required to provide an analysis of, and any recommended changes to, its existing residential electric vehicle charging rates to accommodate longer off-peak time periods that allow for Level 1 charging and the ability to stagger the start time of electric vehicle charging in its Transportation Electrification Plan due November 1, 2025.¹¹⁰

The Commission continues with its Order Point 9:

The Company must provide an analysis of, and any recommended changes to, its existing residential electric vehicle charging rates to accommodate longer off-peak time periods that allow for Level 1 charging and the ability to stagger the start time of electric vehicle charging in its Transportation Electrification Plan due November 1, 2025.¹¹¹

The Company states it has evaluated extending its off-peak period to allow Level 1 charging to better participate in the Company's programs.¹¹² However, the Company states there would be unintended costs of lengthening off-peak periods. Current TOU rates are designed to be revenue neutral. By extending the off-peak period into what is now the mid-peak or on-peak period, the pricing of the periods would need to be reassessed, most likely leading to a higher price for on-peak and mid-peak periods, to account for the longer off-peak period.¹¹³ Rather than altering the currently approved TOU

¹⁰⁹ 2025 TEP at 70.

¹¹⁰ *In the Matter of the Petition of Xcel Energy for approval of a Residential Time of Use Rate Design, Order Approving Revised Opt-in proposal and Setting Reporting Requirements*, May 15, 2025, Docket no. E002/M-23-524, (eDockets) [20255-218995-01](#) (hereinafter: "TOU Order"), at 6.

¹¹¹ TOU Order, at order point 9.

¹¹² 2025 TEP, at 26-27.

¹¹³ *Ibid.*

rates, the Company states that Level 1 charging customers can participate in its whole home two-period residential service rate, which utilizes a longer 12-hour off-peak period instead of the six hour off-peak period of the recently approved three-period residential TOU rate.¹¹⁴ The Company states that it also offers its Residential EV Service tariff featuring a two-period time varying rate that has a longer 12-hour off-peak period as well. The Residential EV Service tariff does require a second meter, but the Company believes the tariff provides a good alternative for Level 1 charging users looking for longer periods of charging.¹¹⁵ The Company states that it does not propose any recommended changes to its existing residential EV charging rates to incorporate Level 1 charging.¹¹⁶

The Company does not respond to “the ability to stagger the start time of electric vehicle charging,”¹¹⁷ as ordered by the Commission.

The Department requests Xcel, in its reply comments, discuss whether there are benefits to extending its off-peak periods to allow for staggered electric vehicle charging.

The Commission has found that rate design, and specifically TOU rates, are important tools toward the cost-effective integration of EVs on to the electric system. TOU rates send clearer price signals to end users by implementing higher prices when demand is highest and lower prices when demand is lowest. The Commission has spoken to this issue previously:

A time-of-use rate could therefore encourage charging during times of low demand and impose higher rates for usage when demand is high to reflect the additional costs this usage imposes on the system. Using rate design to encourage charging during times of low demand can help the electric grid absorb and accommodate the new load created by EVs without the need for new generation or distribution infrastructure, thereby enhancing the efficient use of existing infrastructure and potentially driving down electricity rates.¹¹⁸

The Department continues to recommend, as it did in the Company’s Residential TOU proceeding, that the Commission require Xcel to change the rates and peak periods in the Residential EV Accelerate at Home Pay as You Go Service, Residential Electric Vehicle Subscription Pilot Service, and Multi-Dwelling Unit Electric Vehicle Service Pilot tariffs to reflect the approved residential TOU rates and peak periods.¹¹⁹

¹¹⁴ *Ibid.*

¹¹⁵ *Id.*, at 27.

¹¹⁶ *Ibid.*

¹¹⁷ TOU Order, at Order Point 9.

¹¹⁸ EV Inquiry Order at 5.

¹¹⁹ *In the Matter of the Petition of Northern States Power Company, dba Xcel Energy, for Approval of a Residential Time of Use Rate Design*, Department, Initial Comments, October 15, 2024, Docket No. E002/M-23-524, (eDockets) [202410-210987-01](#).

G.2. Closure of Commercial EV Pilots to New Customers

The Department reviewed the proposed tariff revisions intended to close the Company's Commercial EV Pilots to new customers due to the proposed replacement with Company's Commercial EV Rebate Program. As the Company plans to file the Commercial Rebate Program as an ECO Program, subject to Department review and process:

The Department recommends the Commission deny, without prejudice, Xcel's request to close its Commercial EV Pilots to new customers, pending the review of and decision on its replacement program in ECO. The Company should file for tariff revisions reflecting closure of its Commercial Pilots if/when the Company's proposed Commercial EV Rebate is approved as an ECO modification.

G.3. Net-Metered Participation

Xcel cites changes made in its current Residential TOU Rate proceeding regarding net metering participation.¹²⁰ In its compliance filing in that docket, the Company proposed a methodology for allowing net-metering customers to participate in TOU rates, but did not request approval of the actual TOU net-metering rates.¹²¹ The methodology for determining the TOU net-metering rates is subject to review and Commission decision in its Residential TOU docket. The actual rates will be subject to Commission decision in the Company's 2026 Cogeneration and Small Power Production Report and Petition due January 2, 2026.¹²²

There has yet to be a Commission Order on Xcel's August 2025 compliance filing in its Residential TOU proceeding. However, at the Commission's January 8, 2026 Agenda Meeting regarding Xcel's TOU rate, the Commission verbally moved decision option 4:

Approve Xcel's Compliance Plan and revised methodology for determining the TOU net metering rates corresponding to rates A57, A58, A59, and A60.¹²³

As the Department supports updating Xcel's EV program tariff sheets to reflect the approved residential TOU rates and peak periods, and the Commission has moved to approve the methodology for calculating net-metered TOU rates that Xcel proposed in its August 14, 2025 Compliance filing:

¹²⁰ 2025 TEP, at 72.

¹²¹ *In the Matter of the Petition of Northern States Power Company, dba Xcel Energy, for Approval of a Residential Time of Use Rate Design*, Compliance Filing, Xcel Energy, August 14, 2025, Docket No. E002/M-23-524, (eDockets) [20258-222108-01](#) at 5-9.

¹²² *In the Matter of the Petition of Northern States Power Company, dba Xcel Energy, for Approval of a Residential Time of Use Rate Design*, Department Reply Comments, October 27, 2025, Docket No. E002/M-23-524, (eDockets) [202510-224309-01](#).

¹²³ Commission Agenda Meeting [webcast recording], January 8, 2026, [PUC Agenda Meeting on 2026-01-08 10:00 AM](#), at 2:33:50.

The Department recommends the Commission approve Xcel's tariff revisions to remove the language restricting participation in its EVAAH programs by net-metering customers.

H. OTHER ISSUES

The Department responds to the following notice topic:

Are there other issues or concerns related to this matter?

In review of the 2025 TEP, there was no discussion of customers participating in the currently approved iteration of the Electric School Bus Vehicle to Grid (ESB V2G) program. The Department requests Xcel, in reply comments, provide further detail on whether there has been enrollment in the ESB V2G Pilot. Further, if there has been less enrollment than previously approved funding from the 2023 TEP allows, the Department requests Xcel, in reply comments, provide further information about what will be done with the remaining funds from the original ESB V2G Pilot.

IV. DEPARTMENT RECOMMENDATIONS

Based on analysis of Xcel's Transportation Electrification Plan and the information in the record, the Department has prepared recommendations, which are provided below. The recommendations correspond to the subheadings of Section III above.

A. APPROVE, MODIFY, OR REJECT

- A. The Department will provide a final recommendation on Xcel's TEP in its reply comments.

B. EQUITABLE CUSTOMER OUTCOMES

- B.1.1. The Department requests that Xcel, in reply comments, identify the specific program design and implementation barriers that have limited enrollment among renters and residents of the identified communities, with particular attention to landlord approval requirements, split incentive issues, and gaps in program awareness.
- B.1.1. The Department further requests that Xcel propose concrete strategies to address these barriers, including measures to streamline property owner approvals and detailed community engagement plans tailored to historically under-served areas to increase enrollment and sustained participation.
- B.1.2. The Department requests that Xcel, in reply comments, evaluate how the current program structure addresses financial barriers to entry, particularly regarding upfront installation outlays and credit qualification processes.
- B.1.2. The Department requests that Xcel propose modifications to the customer journey, such as alternative qualification methods or restructuring when incentives are applied, to mitigate these barriers for income-constrained households.
- B.2.1. The Department requests Xcel clarify, in its reply comments, the specific auditing procedures, contract standards, and technical assistance measures it will implement to ensure

rebate pass-through compliance for end-users and to facilitate program participation by small, rural, and community-based contractors.

- B.2.2. The Department requests Xcel, in reply comments, provide geographic analysis demonstrating the distribution of 'standard' vs. 'distribution optimized' customer enrollment across 1) census tracts with high poverty concentrations; 2) environmental justice areas; 3) communities of color; and 4) rural communities. The Department requests this analysis include projected enrollment by feeder to demonstrate whether the higher annual incentive tier will reach historically underserved populations or concentrate in higher-income, EV dense neighborhoods.

C. EV ACCELERATE AT HOME MODIFICATIONS

- C.1.2. The Department requests that Xcel, in reply comments, explain if/how the Enel X shutdown has increased costs for the operation of its EVAAH programs. The Department requests that the explanation include if/how the shutdown of Enel X contributes to the need to increase the monthly customer charges for its EVAAH Subscription Service, Pay-as-You-Go program, and its Voluntary Charger Service.
- C.1.2. The Department requests Xcel provide a detailed explanation of the drivers of proposed increase to the EVAAH monthly customer charges including a comparison of the Company's costs and revenues for its EVAAH programs. If Xcel's responses include a spreadsheet(s), the Department requests the excel spreadsheet format be filed with all formulas and equations intact.

D. COMMERCIAL EV INFRASTRUCTURE REBATE AND ADVISORY PROGRAM

- D.2.1 The Department recommends Xcel provide, in reply comments, the status of its Commercial EV Infrastructure Rebate and Advisory Program ECO modification filing.

E. RESIDENTIAL ADVISORY SERVICES AND GUIDED CHARGING INSTALLATION PROGRAM

- E.2.1. The Department recommends Xcel provide, in reply comments, the status of its Residential Advisory Services and Charging ECO modification filing.

F. CHARGING PERKS ACTIVE MANAGED CHARGING PROGRAM

- F.2. The Department recommends that Xcel review the proposed incentive amount to determine the optimal incentive level needed to achieve the participation rates necessary to defer distribution upgrades.
- F.2. The Department requests Xcel, in reply comments, explain how it is working to address the administrative and operational challenges cited in its 2025 Annual EV Report including an approximate timeline as to when the challenges will be fully addressed.
- F.3. The Department requests that Xcel, in reply comments, discuss the feasibility of incorporating daytime charging windows into its managed charging algorithms to leverage

utility-scale solar generation and designing logic to shift load away from 'calm' (low-wind) nighttime periods.

- F.3. The Department requests that Xcel, in reply comments, discuss the feasibility of a hardware-neutral integration tier, which should allow customers with incompatible vehicles to participate by using networked EVSE and open communication standards, thereby mitigating the technical limitation of any single software vendor.
- F.5. The Department requests Xcel, in reply comments, provide draft tariff sheets for its Charging Perks program.
- F.5. The Department requests the Company, in reply comments, discuss in greater detail how it intends to operate Charging Perks to meet participants' "ready-by" time and at what level of consistency.
- F.6. The Department recommends the Commission set a cost cap set at the budget approved by the Commission.
- F.7. The Department recommends the Commission require Xcel to report on its program yearly and in both the present docket, as well as the Company's Annual EV Report.
- F.7. The Department recommends the Commission approve the Company's proposed reporting requirements.
- F.7. The Department recommends the following additional annual reporting requirements for the Charging Perks program:
 - The rate at which the Company met the participants' "ready-by" time,
 - Customer satisfaction with the program,
 - The opt-out rate for the program broken out into the following categories,
 - Involuntary customer opt-out for not meeting the terms and conditions of the program,
 - Voluntary customer opt-out.
 - Whether any additional vehicles or charger models are eligible to participate in the program, including a discussion of the approximate percentage of vehicles on the road eligible to participate in the program.
 - If additional data access fees have been incurred to allow greater vehicle or charger model eligibility and participation,
 - How the additional data access fees have impacted program costs.
- F.8. the Department requests Xcel, in reply comments, provide a detailed transition timeline for OYC Pilot participants, including how they will be notified of the pilot closure and the specific process for opting into the new incentive structure.
- F.8. The Department further requests Xcel describe, in reply comments, the communication strategy for participants ineligible to enroll in Charging Perks due to vehicle or charging compatibility issues.

G. PROPOSED TARIFF CHANGES

- G.1. The Department requests Xcel, in its reply comments, discuss whether there are benefits to extending its off-peak periods to allow for staggered electric vehicle charging.
- G.1. The Department continues to recommend, as it did in the Company's Residential TOU proceeding, that the Commission require Xcel to change the rates and peak periods in the

Residential EV Accelerate at Home Pay As You Go Service, Residential Electric Vehicle Subscription Pilot Service, and Multi-Dwelling Unit Electric Vehicle Service Pilot tariffs to reflect the approved residential TOU rates and peak periods.

- G.2. The Department recommends the Commission deny, without prejudice, Xcel's request to close its Commercial EV Pilots to new customers, pending the review of and decision on its replacement program in ECO.
- G.3. The Department recommends the Commission approve Xcel's tariff revisions to remove the language restricting participation in its EVAAH programs by net-metering customers.

H. OTHER ISSUES

- The Department requests Xcel, in reply comments, provide further detail on whether there has been enrollment in the ESB V2G Pilot.
- Further, if there has been less enrollment than previously approved funding from the 2023 TEP allows, the Department requests Xcel, in reply comments, provide further information about what will be done with the remaining funds from the original ESB V2G Pilot.

Appendix

Appendix

Attachments

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

Xcel Energy Information Request No. 21
Docket No.: E002/M-25-142
Response To: Minnesota Department of Commerce
Requestor: Rachel Wiedewitsch, Bhavin Pradhan
Date Received: November 24, 2025

Question:

Topic: EV Accelerate at Home (EVAAH)

Reference(s): Commission Notice Topic 3

The Commission's Notice at topic number three in referencing Xcel's proposed modifications to its EVAAH programs, asks stakeholders to discuss whether the Commission should:

- b. Approve the proposed accounting treatment.
 - c. Approve the proposed reporting requirements.
1. Is Xcel proposing a change to the accounting treatment that was approved by the Commission in its October 6, 2020 Order in Docket No. E002/M-19-559?
 2. Is Xcel proposing a change to the reporting requirements that were approved by the Commission in its October 6, 2020 Order in Docket No. E002/M-19-559?
 3. If not proposing changes to the accounting treatment, or the reporting requirements previously approved by the Commission, please provide a discussion of why changes are unnecessary.

Response:

1. No, the Company is not proposing any changes to the accounting treatment for the EV Accelerate at Home program.
2. No, the Company is not proposing any changes to the reporting requirements for the EV Accelerate at Home program.
3. The proposed changes to our EV Accelerate at Home program are primarily related to the pricing of the program and the peak period times to sync the pricing of the program with our approved Residential TOU Rate, along with changes to ensure that net metering customers can participate in the program for the first time. These changes do not change how the program operates in any material way. As there is no material change in the operation of the

program, the existing accounting treatment and reporting requirements are still appropriate for the program.

Preparer: Brandon Kirschner
Title: Regulatory Policy Specialist
Department: NSPM Regulatory
Telephone: 612-215-5361
Date: December 4, 2025

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

Xcel Energy Information Request No. 38
Docket No.: E002/M-25-142
Response To: Minnesota Department of Commerce
Requestor: Anthony Fryer
Date Received: December 3, 2025

Question:

Topic: Xcel Energy's 2025 Integrated Distribution Plan

Reference(s): 2025 Transportation Electrification Plan

1. Xcel Energy (Xcel or the Company) states that its proposed *Commercial EV Infrastructure Rebate and Advisory Program* and *Residential Advisory Services and Guided Charging Installation Program* will “qualify as an offering under the Efficient Fuel Switching portfolio in ECO.”¹ Please describe how these programs will qualify as efficient fuel-switching (EFS) programs within ECO. Specifically, how will these programs meet the necessary EFS technical criteria listed in Minnesota Statutes 216B.241 Subdivision 11(d) and adhere to the Department of Commerce’s EFS Technical Guidance²?

¹ *In the Matter of Xcel Energy’s 2025 Integrated Distribution Plan*. Xcel Energy. 2025 Transportation Electrification Plan. October 31, 2025. E-002/M-25-142. At 68.

² *In the Matter of Technical Guidance for the Inclusion of Efficient Fuel-Switching, Load Management, and Pre-Weatherization Measures in CIP*. Minnesota Department of Commerce. March 12, 2022. E,G999/CIP-21-837.

Response:

The Company continues to prepare specific technical analysis for our Energy Conservation and Optimization program (ECO) modification filing but offers the following explanation: these programs will adhere to the EFS requirements in Minnesota Statutes 216B.241 Subdivision 11(d) and adhere to the Department of Commerce’s EFS Technical Guidance (Docket No. E,G999/CIP-21-837).

With regard to the Residential Advisory Services and Guided Charging Installation Program, this is intended to be an indirect impact EFS program similar to the existing EFS Training and Support program. This will cover education and marketing delivery methods that the Company has historically offered to customers that position us as a trusted resource for EV charging programs. This will also cover the introduction of a

Guided Charging Installation Program which will provide a single, flexible educational pathway on our website for customers to learn about home charging options. These efforts will contribute to customer adoption of electric vehicles. Since these efforts do not offer direct savings, they will not need to meet the technical requirements outlined in statute or the technical guidance.

The Commercial EV Infrastructure Rebate and Advisory Program is focused on market transformation and will be a direct impact program providing incentives for public charging. The Company plans to claim gasoline savings from these projects as they are enabling new charging for existing and new EVs. The Company expects these gasoline savings, and the associated electric impacts, will meet the statutory requirements of being cost effective on the Minnesota Cost Test, reducing greenhouse gases and providing energy savings on a source energy basis. The screening of statutory requirements, and the technical guidance, will be provided in the Company's ECO modification, including Deemed Sheets and forecast technical assumptions for the measure the Company seeks to incentivize. This analysis will be in the same format as Appendix 3 from the Company's 2024-2026 ECO Triennial.

Preparer:	Alison E. Roth	Karl Shlanta
Title:	DSM Renewable Policy Strategy Consultant	Regulatory Policy Specialist
Department:	Product Policy	DSM Strategy and Policy
Email:	Alison.e.roth@xcelenergy.com	Karl.s.shlanta@xcelenergy.com
Date:	December 15, 2025	

- Not-Public Document – Not For Public Disclosure
 Public Document – Not-Public Data Has Been Excised
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Xcel Energy Information Request No. 22
Docket No.: E002/M-25-142
Response To: Minnesota Department of Commerce
Requestor: Rachel Wiedewitsch, Bhavin Pradhan
Date Received: November 24, 2025

Question:

Topic: Charging Perks

Reference(s): Commission Notice Topic 4

The Commission's Notice topic at notice topic 4 in referencing Xcel's Charging Perks proposal, asks stakeholders to discuss whether the Commission should:

- a. Approve the updated tariff sheets.
 - b. Approve the proposed customer service agreements.
 - c. Approve the proposed accounting treatment.
1. Please provide Xcel's proposed tariff sheets.
 2. Please provide Xcel's proposed customer service agreement.
 3. The Company, at page 62, states that it is "not proposing to include Charging Perks in our January ECO modifications but will request cost recovery in a future electric rate case proceeding," but goes no further into its proposed accounting treatment for the new program
 - a. Please provide Xcel's proposed accounting treatment.

Response:

1. The Company is not proposing any tariffs related to the Charging Perks program.
2. See Attachment A to this response for a draft of program Terms and Conditions. Please note that these draft terms are subject to change prior to program launch based on the ultimate decision by the Commission on the program.
3. We intend to seek recovery of the costs of the program through a future electric rate case request, so the Company is not asking for any special accounting treatment for the Charging Perks program at this time. The anticipated costs for the Charging Perks program are all operations and maintenance costs (O&M).

Program costs will consist of customer incentives, vendor payments, data management fees and all other program administration costs set forth in the filing. O&M program costs would be accounted for in the appropriate FERC O&M accounts at the time the costs are incurred. Operating expenses are accounted for in FERC Account 401 and maintenance expenses are accounted for in FERC Account 402. There are no revenues from the program that will need to be accounted for.

Preparer:	Brandon Kirschner	Lucas E. Roach
Title:	Regulatory Policy Specialist	Sr Mgr, EV Product Portfolio
Department:	NSPM Regulatory	Clean Transport Product Mgmt
Telephone:	612-215-5361	612-330-5568
Date:	December 4, 2025	



XCEL ENERGY CHARGING PERKS

Terms & Conditions

Minnesota

Northern States Power of Minnesota, doing business as Xcel Energy (“Xcel Energy”) is excited to offer a dynamic Charging Perks program to its Minnesota residential electric rate customers who own or lease an eligible electric vehicle Charger or Electric Vehicle (EV), which is charged at their home served by Xcel Energy (“Charging Perks”).

As part of Charging Perks, Xcel Energy will work with a variety of automobile manufacturers and third parties (individually and collectively referred to as “Smart Charging Provider” or “Smart Charging Providers”) to manage the daily charging of participating Chargers or EVs to help the power grid operate more efficiently and utilize more renewable energy.

In exchange for your participation in Charging Perks, Xcel Energy will issue you an upfront incentive (“Initial Incentive”) and a participation reward (“Participation Reward”). The Initial Incentive will be paid one time after your application has been reviewed and you have been accepted into Charging Perks. The Participation Reward will be paid at the end of each year that you participate in Charging Perks. The Participation Reward will be paid after December 31st to customers who have been enrolled in Charging Perks for at least 30 days and who are enrolled as of December 1 of that year. The following Table highlights the amounts of the Initial Incentive and Participation Reward.

Customer Type	Charging description	Initial incentive	Participation reward
Standard Customer	Customers who own an eligible vehicle or charger that are not determined to be served by a Constrained Feeder as defined by the Company. Charging will be scheduled to align with low cost and low carbon generation as well as other bulk system	\$50	\$25
Distribution Optimized Customer	Customers who own or lease an eligible vehicle or charging that are determined to be served by a Constrained Feeder as defined by the Company. Customer charging will be scheduled primarily to avoid feeder peaks along with optimizing for bulk system needs in the same manner as a Standard Customer	\$50	\$75

The Initial Incentive and Participation Reward will be issued to customers as Bill Credits, delivered by Xcel Energy to your monthly bill following the month in which the Initial Incentive or Participation Reward were earned.

In order to enroll in Charging Perks please review these terms (“Program Terms”) and indicate your understanding and agreement. Submitting your application to participate in Charging Perks shall confirm your agreement to the Program Terms. After reviewing your application, Xcel Energy will notify you if you qualify for Charging Perks by e-mail (the date of the e-mail will be the “Enrollment Date”).

1. ELIGIBILITY

To be eligible to participate and to qualify for the Initial Incentive and Participation Reward, you must meet and continue throughout the duration of your participation in Charging Perks to meet, the following criteria:

- Own or lease an eligible EV charger (“Charger”) or EV as specified in footnote¹
- Complete a Charging Perks application, and be selected by Xcel Energy to participate in Charging Perks (Enrollment will be determined by Xcel Energy, in its sole discretion);
- Provide accurate and complete information as part of your participation in Charging Perks. Xcel Energy is not responsible for any harm or inaccuracies caused by you or for misstatements, misrepresentations or failure to provide accurate and complete information;
- Be a residential Xcel Energy customer and receive electric service from Xcel Energy in Minnesota at the home where your EV is charged;
- At a minimum, plug your EV into an outlet or charging station at your home address at least twice a month (excluding weeks when you are on vacation);
- Participants must not exceed an opt out rate, defined as the percentage of time overriding the Charging Perks schedule, of

20% on an annual basis to remain enrolled in the Charging Perks program.

- Your Charger or EV must remain connected to your EV manufacturer’s network via a cellular connection, as specified by the Smart Charging Provider;
- If required by the Smart Charging Provider, you agree to and will download any Smart Charging Provider required software application needed for you to participate in Charging Perks; comply with any Smart Charging Provider terms and conditions; and meet any other participation requirements of the Smart Charging Provider; and
- You agree to these Program Terms and to participate in Charging Perks as set forth in these Program Terms.

Failure to meet any of the above eligibility requirements at any time will void any obligation Xcel Energy has to pay you the Initial Incentive and/or Participation Reward and Xcel Energy may immediately terminate your participation.

2. SHARING OF XCEL ENERGY CUSTOMER INFORMATION

Xcel Energy will provide Smart Charging Providers with a list of Minnesota service territory zip codes to help identify those Xcel Energy customers

¹ An eligible electric vehicle is one that is fully battery electric or a plug-in hybrid electric vehicle that is charged with a Level 2 charger and can communicate with the Smart Charging Provider through in-vehicle communications (e.g., 3-G or 4-G connection), as Page 1 of 3

determined by the Smart Charging Providers. The list of eligible Chargers as well as EV makes and models can be found on [Xcel Energy’s Charging Perks website](#).

Terms & Conditions

eligible to participate. Your sharing of data with the Smart Charging Provider is between you and the Smart Charging Provider. Once you enroll in Charging Perks, however, you understand and agree that Smart Charging Providers will, for purposes of Charging Perks, securely share your data with Xcel Energy, to include personal information (including but not limited to name, address, and email and either Charger or EV details (make, model, battery size, and charging rate) and charging data from your EV or Charger). The Smart Charging Provider may provide data associated with how your EV charges at home and away from home. Xcel Energy may share this data directly with its authorized suppliers and consultants, and will use this data to validate your eligibility to participate in Charging Perks, to study

and evaluate the benefits Charging Perks can provide to the power grid, in connection with proceedings before the Minnesota Public Utilities Commission, to share aggregated and anonymized findings, to develop and refine Xcel Energy products and programs, and to manage the power grid. Xcel Energy will supply your rate code to the Smart Charging Provider once Xcel Energy validates your eligibility. If you withdraw from Charging Perks or Charging Perks is discontinued by Xcel Energy, Xcel Energy and Smart Charging Providers will cease the sharing of your information without unreasonable delay. Xcel Energy maintains administrative, technical and physical safeguards designed to protect the privacy and security of the information we maintain about you, as outlined on [Xcel Energy's Privacy website](#).

3. CHARGING PERKS EV SCHEDULING INFORMATION

As part of Charging Perks, the Smart Charging Provider will communicate a charging schedule to your EV or Charger when it is charging at your home. The schedule is communicated from the Smart Charging Provider to your EV or Charger, using the existing communications equipment installed in the EV or Charger. The schedule is customized for you by the Smart Charging Provider and may change every time you plug-in your EV depending on numerous factors such as your needs which you communicate to the Smart Charging Provider, wind and solar generation, the needs of the power grid based on input from Xcel Energy sent to the Smart Charging Provider, and the state of charge of your EV. In addition to daily scheduled EV charging, your Smart Charging Provider may occasionally request to pause your EV charging during rare emergency grid events (Demand Response Events). During these Demand Response Events, Xcel Energy may request your Smart Charging Provider to pause EV charging for 1 to 2 hours to help with grid stability. No action is needed on your part. Your Smart Charging Provider will provide you advanced notice of these events, and you always have the ability to opt-out, if needed.

4. CHARGING PERKS PARTICIPATION DETAILS

Charging Perks offers you the option to override the Smart Charging Provider's charging schedule, or any proposed pause to your EV charging schedule, any day of the year when you need more immediate EV charging than the Smart Charging Provider's schedule affords. Participants that override scheduling more than 20% of the time will be subject to removal from the Charging Perks program.

Upon submitting your application, if enrolled into Charging Perks, Xcel Energy will categorize the applicant as either a Standard Customer or a Distribution Optimized Customer as defined in this paragraph and in the table above s based on the primary feeder that serves your premise. On an annual basis Charging Perks program staff will work with system planning groups to identify Constrained Feeders which are defined as those that meet loading characteristics as defined in the 2025 TEP filed with the Minnesota Public Utilities Commission. If you are enrolled in Charging Perks and Xcel Energy determines in its sole discretion that you are on a Constrained Feeder, you will be categorized as a Distribution Optimized

Customer and those that are determined to not be served by a Minnesota Constrained Feeder will be categorized as a Standard Customer. You will be contacted annually via the email you provide in the enrollment application to notify you of your categorization and annual participation incentive level.

5. SMART CHARGING BILL IMPACTS

Xcel Energy does not guarantee that your participation in Charging Perks will reduce your electricity bill. If you are on the Residential General (Schedule R), your participation in Charging Perks should not affect your electricity bill and you will receive an Initial Incentive and Participation Reward for participating. If you are on the Residential Time-of-Use Rate (Rate Code A72 or A74) or Residential Time of Day Rate (A02 or A04) the impact on your electricity bill will depend on how you typically charge your EV. Most often, Charging Perks will shift your EV charging to the cheaper off-peak times when there are abundant renewables. The instances when it shifts your charging into more expensive on-peak periods should be rare but could result in increases in your electricity bill.

6. ACKNOWLEDGEMENT OF CUSTOMER

Xcel Energy does not guarantee that your EV will have a full state of charge or have achieved your desired state of charge by the time you need to unplug your EV at your home address to begin using your EV. The state of charge of your EV is contingent upon several factors and may be affected by reasons such as when you plugged your EV in, when you need to unplug and use your EV, your type of charging equipment, the state of the power grid, and the effectiveness of the charging schedule that the Smart Charging Provider creates and sends to your EV. You are responsible for ensuring that your state of charge is sufficient for your intended use prior to using your EV.

7. PROGRAM TERM AND WITHDRAWAL

- 7.1 Xcel Energy may adjust the term of Charging Perks based on customer participation or other factors that require Xcel Energy to change the term to achieve the objectives of Charging Perks, including those objectives specified in Xcel Energy's 2025 Transportation Electrification Plan (TEP) filed with the Minnesota Public Utilities Commission.
- 7.2 You may withdraw from Charging Perks at any time without penalty.
- 7.3 Xcel Energy may discontinue Charging Perks at any time for any reason.
- 7.4 These Program Terms shall remain in effect, unless terminated pursuant to other provisions of the Program Terms, Xcel Energy's tariffs or until Charging Perks is discontinued by Xcel Energy. Xcel Energy will use reasonable effort where possible to provide Charging Perks participants a discontinuation notice at least thirty (30) days prior to such termination date.
- 7.5 You will notify your Smart Charging Provider or send an email to ElectricVehicles@xcelenergy.com in the event you wish to unenroll from Charging Perks, the ownership of an enrolled Charger or EV in Charging Perks changes, or you move out of Xcel Energy's Minnesota service territory.
- 7.6 Each Charger or EV for which you wish to enroll in Charging Perks must be separately enrolled, but multiple enrolled EVs or Chargers will not increase the available incentives. Initial Incentives and Participation Rewards are given on a per premise basis.
- 7.7 In the event the Smart Charging Provider or Xcel Energy becomes aware of a change of ownership of an enrolled Charger or EV or the permanent move of a Charger or EV such that its home address now resides outside Xcel Energy's Minnesota service territory without first hearing from you, you will be deemed to have withdrawn from Charging Perks and the Smart Charging Provider will communicate unenrollment to you.
- 7.8 If you withdraw from Charging Perks, fail to adhere to these Program

Terms & Conditions

Terms, fail to meet Charging Perks requirements set forth in these Program Terms, or if Xcel Energy or Smart Charging Provider discovers any tampering with either Charger or EV equipment, then Xcel Energy shall have the right to terminate your participation in Charging Perks immediately, and/or immediately advise the Smart Charging Provider to stop sending smart charging schedules related to Charging Perks, and/or stop payment of any unearned Participation Reward as of the date of withdrawal or termination.

Minnesota

8. LIMITATIONS

- 8.1. Charging Perks and Terms are subject to change any time. To determine whether any changes to Charging Perks have occurred, visit [Xcel Energy's Charging Perks website](#). Any material changes will be communicated to you by e-mail using the e-mail address provided during your enrollment. Your continued participation in Charging Perks following any change is your acceptance of the change and agreement to the Program Terms as modified by Xcel Energy.
- 8.2. Xcel Energy reserves the right to modify any and all Incentives and Rewards based on future performance, modifications to Charging Perks, technology upgrades, and changes to Xcel Energy's electrical distribution system. Any such changes will be communicated to you by e-mail using the e-mail address provided by you at least thirty (30) days prior to deployment of such changes. You agree not to tamper with Chargers, EVs, or EV data and to reasonably attempt to restrict access by others attempting to tamper with the Chargers, EVs, or EV data. If Xcel Energy or the Smart Charging Provider identify any evidence of tampering, you will be removed from Charging Perks.
- 8.3. You agree to indemnify and hold harmless Xcel Energy from any and all claims, damages and liability caused by your fault or negligence, or your failure to comply with these Program Terms. If Xcel Energy is made a party (without fault on its part) to any lawsuit or arbitration started by or against you, you agree to protect and hold Xcel Energy harmless, and to pay all costs, expenses and reasonable attorneys' fees incurred or paid by Xcel Energy in connection with that lawsuit or arbitration. You also agree to pay all costs, expenses and reasonable attorneys' fees that Xcel Energy may incur or pay in enforcing the Program Terms.
- 8.4. YOUR PARTICIPATION IN CHARGING PERKS IS ENTIRELY VOLUNTARY. XCEL ENERGY DOES NOT ASSUME ANY RESPONSIBILITY OR LIABILITY FOR YOUR CHARGER OR EV, THE STATE OF CHARGE OF YOUR EV AT ANY GIVEN TIME, YOUR INABILITY TO USE OR UNAVAILABILITY OF YOUR CHARGER AND/OR EV OR ANY DAMAGES TO OR INCURRED BY YOU OR YOUR CHARGER AND/OR EV WHICH MAY ARISE FROM OR RELATE TO YOUR PARTICIPATION IN CHARGING PERKS. XCEL ENERGY MAKES NO REPRESENTATION OR WARRANTY, EXPRESS OR IMPLIED REGARDING YOUR PARTICIPATION IN CHARGING PERKS, OR THE RESULTS THEREOF. IN NO EVENT, WHETHER BASED ON CONTRACT, INDEMNITY, WARRANTY, TORT (INCLUDING NEGLIGENCE), STRICT LIABILITY OR OTHERWISE, SHALL XCEL ENERGY BE LIABLE TO YOU FOR DIRECT, SPECIAL, INDIRECT, EXEMPLARY, PUNITIVE, INCIDENTAL, OR CONSEQUENTIAL DAMAGES WHATSOEVER INCLUDING, WITHOUT LIMITATION, LOSS OF PROFITS OR REVENUE, AND IN NO EVENT SHALL XCEL ENERGY'S LIABILITY ON ANY CLAIM OF ANY KIND, OR FOR ANY LOSS OR DAMAGE ARISING OUT OF OR IN CONNECTION WITH OR RESULTING FROM CHARGING PERKS, THESE PROGRAM TERMS, OR FROM PERFORMANCE OR BREACH THEREOF, EXCEED THE TOTAL AMOUNT OF THE INITIAL INCENTIVE AND PARTICIPATION REWARDS PAID TO YOU DURING YOUR PARTICIPATION IN CHARGING PERKS.

9. REQUIREMENTS

- 9.1. You agree to maintain services needed to participate in Charging Perks at no expense to Xcel Energy. These services may include but are not limited to maintaining internet connectivity as well as maintaining subscription services with the manufacturer of the enrolled EV or Charger to allow communication between the Smart Charging Provider and the EV or Charger. Depending on the EV or Charger and the Smart Charging Provider, this may require you to activate and/or pay for a subscription. The Smart Charging Provider will communicate with you regarding such a requirement and any additional costs that are associated with the subscription. For further information, please communicate with your Smart Charging Provider.
- 9.2. You are responsible for maintaining in working order your home EV charging or electrical equipment and the participating EV or Charger.

10. GOVERNING LAW; DISPUTES

You and Xcel Energy agree that all disputes arising out of these Program Terms or Charging Perks shall be subject to this Section 10. The internal laws of the State of Minnesota, without regard to its conflicts of laws provisions, govern Charging Perks and these Program Terms and any action brought with respect to the Program Terms or Charging Perks shall be brought in the courts located in Hennepin County, Minnesota.

11. COMMUNICATIONS

You consent to receive communications from Xcel Energy relating to Charging Perks in electronic form sent to your email address provided during enrollment.

12. GENERAL TERMS

Unless indicated otherwise, these Program Terms are between you and Xcel Energy and create no third-party beneficiaries. Unless indicated otherwise, nothing in these Program Terms gives or shall be construed to give or provide any benefit, direct, indirect, or otherwise to third parties unless third persons are expressly described as intended to be beneficiaries of its terms. You may not assign any rights or delegate any of your responsibilities under these Program Terms, without the prior written consent of Xcel Energy. Any prohibited assignment or delegation shall be null and void. In the event any words, phrases, clauses, sentences or other provisions hereof are invalid or violate any applicable law, such offending provision(s) shall be ineffective to the extent of such violation without invalidating the remainder of the Program Terms, and the remaining provisions of the Program Terms shall be construed consistent with the intent of the parties hereto as closely as possible, and the Program Terms, as reformed, shall be valid, enforceable and in full force and effect. The failure of either party at any time to insist upon the strict performance of any or all of the terms, conditions, and covenants in these Program Terms shall not be deemed a waiver by that party of any subsequent breach or default in the said terms, conditions, or covenants by the other party. These Program Terms constitute the complete and exclusive understanding of the parties concerning its subject matter. These Program Terms supersede all prior agreements and understandings (whether written or oral) between you and Xcel Energy, with respect to Charging Perks. Those provisions of these Program Terms which would require that they survive termination in whole or part in order to give them full force and effect will survive the termination, regardless of the date, cause or manner of the termination, as well as Xcel Energy's right to retain and use any data collected in connection with Charging Perks.

13. QUESTIONS

If you have questions regarding Charging Perks or these Program Terms, please email ElectricVehicles@xcelenergy.com

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Xcel Energy Information Request No. 42
Docket No.: E002/M-25-142
Response To: Minnesota Department of Commerce
Requestor: Rachel Wiedewitsch, Bhavin Pradhan
Date Received: December 17, 2025

Question:

Topic: TEP – Charging Perks

Reference(s): Xcel TEP Table 17

Xcel is proposing \$75 annual rebate (Xcel TEP Table 17) for Distribution Optimized Customers on constrained feeders, which the Company states it defines and identifies internally on an annual basis.

1. What percentage of your residential customers qualify for this tier today?
2. What is the threshold Xcel uses to identify constrained feeders?

Response:

1. We have not yet determined which customers qualify for the tier but will do so on an annual basis using forecasted feeder loading data. For initial budgeting purposes we assume 30 percent of customers would qualify based on preliminary piloting of a similar program by Public Service Company of Colorado.
2. Please see Table 18 from the filing for the criteria that will be considered when defining constrained feeders. If the TEP is approved, the Company will engage its vendor and system planning team to conduct analysis that will determine the specific threshold parameters for constrained feeders and customer incentives.

**Table 1 (TEP Table 18)
Feeder Criteria**

Criteria	Description
Feeder Loading Frequency	Duration of loading above nameplate capacity
Feeder Loading Magnitude	Maximum loading in excess of nameplate capacity
Program Participation	Number of controlled EV's per feeder
Scheduled Upgrades	Is an upgrade planned to meet existing overloads?

Preparer: Lucas E. Roach
Title: Sr Mgr, EV Product Portfolio
Department: Clean Transport Product Mgmt
Telephone: 612-330-5568
Date: December 29, 2025

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

Xcel Energy Information Request No. 40
Docket No.: E002/M-25-142
Response To: Minnesota Department of Commerce
Requestor: Rachel Wiedewitsch, Bhavin Pradhan
Date Received: December 17, 2025

Question:

Topic: TEP – Charging Perks

Reference(s): Xcel Response to Department IR 22

In response to Department IR 22, Xcel stated that it is not proposing tariffs related to the Charging Perks program.

1. Please provide an explanation as to why tariffs are not necessary for Charging Perks.
2. Will the Customer Service Agreement serve as the governing document for Charging Perks? If so:
 - a. Please explain the reasoning for utilizing a Customer Service Agreement versus tariffing a program.
 - b. Where has the Company employed this approach before?

Response:

1. The Company proposed operating the Charging Perks program without a tariff to be consistent with the operation of other incentive programs, such as AC Rewards and Saver's Switch, which do not have tariffs. These types of incentive programs do not affect customer rates but incentivize behavior changes for customers outside of their normal rates. The Company and Customer responsibilities are addressed through a Customer Service Agreement. The Company provided a copy of the draft Customer Service Agreement for the program as Attachment A to our response to Minnesota Department of Commerce Information Request No. 22 in this docket.

The managed charging market is an evolving industry, and the Company relies on third-party vendors and software providers to successfully run the program. Flexibility is crucial to navigating potential frequent changes in the market. The Company believes the Customer Service Agreement provides the most appropriate means of administering the program in a transparent and responsive manner.

2. Yes, the Customer Service Agreement will serve as the governing document for Charging Perks.
 - a. The Company believes that the Customer Service Agreement serves as a comprehensive document that will adequately govern the relationship between us and the customer.
 - b. AC Rewards and Saver's Switch are two similar incentive programs that the Company operates without a tariff.
-

Preparer:	Brandon M. Kirschner	Lucas E. Roach
Title:	Regulatory Policy Specialist	Sr Mgr, EV Product Portfolio
Department:	NSPM Regulatory	Clean Transport Product Mgmt
Telephone:	612-215-5361	612-330-5568
Date:	December 29, 2025	

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
Comments

Docket No. E002/M-25-142

Dated this **13th** day of **January 2026**

/s/Sharon Ferguson

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
1	Daniel	Abelson	daniel.abelson@metc.state.mn.us	Metropolitan Council		390 Robert Street N. St. Paul MN, 55101 United States	Electronic Service		No	M-25-142
2	Brian	Allen	brian.allen@allenergysolar.com	All Energy Solar, Inc		1642 Carroll Ave Saint Paul MN, 55104 United States	Electronic Service		No	M-25-142
3	Michael	Allen	michael.allen@allenergysolar.com	All Energy Solar		721 W 26th st Suite 211 Minneapolis MN, 55405 United States	Electronic Service		No	M-25-142
4	Ellen	Anderson	ellena@umn.edu	325 Learning and Environmental Sciences		1954 Buford Ave Saint Paul MN, 55108 United States	Electronic Service		No	M-25-142
5	Janet	Anderson	jcainstp@icloud.com	-		1799 Sargent St. Paul MN, 55105 United States	Electronic Service		No	M-25-142
6	Jay	Anderson	jaya@cmpas.org	CMPAS		7550 Corporate Way Suite 100 Eden Prairie MN, 55344 United States	Electronic Service		No	M-25-142
7	MK	Anderson	anderson@fresh-energy.org	Fresh Energy		408 St Peter Street Saint Paul MN, 55102 United States	Electronic Service		No	M-25-142
8	David	Assaf	daassaf@flaherty-hood.com	Flaherty & Hood, P.A.		525 Park Street Suite 470 St. Paul MN, 55102 United States	Electronic Service		No	M-25-142
9	Donna	Attanasio	dattanasio@gwu.edu	George Washington University		2000 H Street NW Washington DC, 20052 United States	Electronic Service		No	M-25-142
10	John	Bailey	bailey@ilsr.org	Institute For Local Self-Reliance		1313 5th St SE Ste 303 Minneapolis MN, 55414 United States	Electronic Service		No	M-25-142
11	Anjali	Bains	bains@fresh-energy.org	Fresh Energy		408 Saint Peter Ste 220 Saint Paul MN, 55102 United States	Electronic Service		No	M-25-142
12	Mark	Bakk	mbakk@lcp.coop	Lake Country Power		26039 Bear Ridge Drive Cohasset MN, 55721 United States	Electronic Service		No	M-25-142
13	Jared	Ballew	jared.ballew@ev.energy	EV.ENERGY CORP		726 18th St. Des Moines IA, 50314 United States	Electronic Service		No	M-25-142
14	Shay	Banton	shayb@irecusa.org	Interstate Renewable Energy Council		600 H Street NE Apt. 341 Washington DC, 20002 United States	Electronic Service		No	M-25-142
15	Laura	Beaton	beaton@smwlaw.com	Shute, Mihaly & Weinberger LLP		396 Hayes Street San Francisco CA, 94102 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
16	Mathias	Bell	mathias@weavegrid.com	WeaveGrid		375 Alabama Street, Suite 325 San Francisco CA, 94110 United States	Electronic Service		No	M-25-142
17	Jeff	Benson	jbenson@southcentralelectric.com	South Central Electric Association		PO Box 150 71176 Tiell Drive St. James MN, 56081 United States	Electronic Service		No	M-25-142
18	Sasha	Bergman	sasha.bergman@state.mn.us		Public Utilities Commission	121 7th PI E Ste 350 St. Paul MN, 55101 United States	Electronic Service		Yes	M-25-142
19	Derek	Bertsch	derek.bertsch@mrenergy.com	Missouri River Energy Services		3724 West Avera Drive PO Box 88920 Sioux Falls SD, 57109-8920 United States	Electronic Service		No	M-25-142
20	Barb	Bischoff	barb.bischoff@nngco.com	Northern Natural Gas Co.		CORP HQ, 714 1111 So. 103rd Street Omaha NE, 68124-1000 United States	Electronic Service		No	M-25-142
21	Ingrid	Bjorklund	ibjorklund@avisenlegal.com	Avisen Legal		901 S. Marquette Ave. #1675 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-142
22	Ingrid	Bjorklund	ingrid@bjorklundlaw.com	Bjorklund Law, PLLC		855 Village Center Drive #256 North Oaks MN, 55127 United States	Electronic Service		No	M-25-142
23	William	Black	bblack@mmua.org	MMUA		Suite 200 3131 Fernbrook Lane North Plymouth MN, 55447 United States	Electronic Service		No	M-25-142
24	Kenneth	Bradley	kbradley@environmentminnesota.org			2837 Emerson Ave S Apt CW112 Minneapolis MN, 55408 United States	Electronic Service		No	M-25-142
25	Jon	Brekke	jbrekke@grenergy.com	Great River Energy		12300 Elm Creek Boulevard Maple Grove MN, 55369-4718 United States	Electronic Service		No	M-25-142
26	Kathleen	Brennan	kbrennan@spencerfane.com	Spencer Fane LLP		100 South Fifth Street, Suite 2500 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-142
27	Sydney R.	Briggs	sbriggs@swce.coop	Steele-Waseca Cooperative Electric		2411 W. Bridge St PO Box 485 Owatonna MN, 55060-0485 United States	Electronic Service		No	M-25-142
28	Mark B.	Bring	mbring@otpc.com	Otter Tail Power Company		215 South Cascade Street	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
						PO Box 496 Fergus Falls MN, 56538-0496 United States				
29	Matthew	Brodin	mbrodin@allete.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	M-25-142
30	Ed	Brolin	ed.brolin@rwe.com	RWE Clean Energy		100 Summit Lake Drive Suite 210 Valhalla NY, 10595 United States	Electronic Service		No	M-25-142
31	Christopher	Browning	christopher.browning@nexteraenergy.com			null null, null United States	Electronic Service		No	M-25-142
32	Christina	Brusven	cbrusven@fredlaw.com	Fredrikson Byron		60 S 6th St Ste 1500 Minneapolis MN, 55402-4400 United States	Electronic Service		No	M-25-142
33	Mike	Bull	mike.bull@state.mn.us		Public Utilities Commission	121 7th Place East, Suite 350 St. Paul MN, 55101 United States	Electronic Service		Yes	M-25-142
34	Jerry	Byer	jbyer@itasca-mantrap.com	Itasca-Mantrap Coop. Electrical Ass'n		PO Box 192 Park Rapids MN, 56470 United States	Electronic Service		No	M-25-142
35	Jennifer	Cady	jjcady@mnpower.com	Minnesota Power		30 W Superior St Duluth MN, 55802 United States	Electronic Service		No	M-25-142
36	Daniel T	Carlisle	todd-wad@toddwadena.coop	Todd-Wadena Electric Cooperative		550 Ash Ave NE PO Box 431 Wadena MN, 56482 United States	Electronic Service		No	M-25-142
37	Douglas M.	Carnival	dcarnival@carnivalberns.com	McGrann Shea Carnival Straughn & Lamb		800 Nicollet Mall Ste 2600 Minneapolis MN, 55402-7035 United States	Electronic Service		No	M-25-142
38	Pat	Carruth	pat@mnvalleyrec.com	Minnesota Valley Coop. Light & Power Assn.		501 S 1st St. PO Box 248 Montevideo MN, 56265 United States	Electronic Service		No	M-25-142
39	Gabriel	Chan	gabechan@umn.edu			130 Hubert H. Humphrey Center 301 19th Ave S Minneapolis MN, 55455 United States	Electronic Service		No	M-25-142
40	Ray	Choquette	rchoquette@agp.com	Ag Processing Inc.		12700 West Dodge Road PO Box 2047 Omaha NE, 68103-2047 United States	Electronic Service		No	M-25-142
41	Eric	Clement	eclement@mnpower.com	Minnesota Power		null null, null United States	Electronic Service		No	M-25-142
42	City	Clerk	gregg.engdahl@ci.stcloud.mn.us	City of St. Cloud		400 Second St. S	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
						St. Cloud MN, 56301 United States				
43	Joshua	Cohen	josh.cohen@swtchenergy.com	SWTCH Energy, Inc.		Greentown Labs 444 Somerville Avenue Somerville MA, 02143 United States	Electronic Service		No	M-25-142
44	Kenneth A.	Colburn	kcolburn@symbioticstrategies.com	Symbiotic Strategies, LLC		26 Winton Road Meredith NH, 32535413 United States	Electronic Service		No	M-25-142
45	Steve	Coleman	stevecolemanpuma@gmail.com			231 Winifred St W Saint Paul MN, 55107 United States	Electronic Service		No	M-25-142
46	Generic	Commerce Attorneys	commerce.attorneys@ag.state.mn.us		Office of the Attorney General - Department of Commerce	445 Minnesota Street Suite 1400 St. Paul MN, 55101 United States	Electronic Service		Yes	M-25-142
47	Kevin	Cray	kevin@communitysolaraccess.org	CCSA		1644 Platte St Denver CO, 80202 United States	Electronic Service		No	M-25-142
48	George	Crocker	gwillc@nawo.org	North American Water Office		5093 Keats Avenue Lake Elmo MN, 55042 United States	Electronic Service		No	M-25-142
49	Stacy	Dahl	sdahl@minnkota.com	Minnkota Power Cooperative, Inc.		5301 32nd Ave S Grand Forks ND, 58201 United States	Electronic Service		No	M-25-142
50	George	Damian	gdamian@cleanenergyeconomymn.org	Clean Energy Economy MN		13713 Washburn Ave S Burnsville MN, 55337 United States	Electronic Service		No	M-25-142
51	Lisa	Daniels	lisadaniels@windustry.org	Windustry		201 Ridgewood Ave Minneapolis MN, 55403 United States	Electronic Service		No	M-25-142
52	James	Darabi	james.darabi@solarfarm.com			2355 Fairview Ave #101 St. Paul MN, 55113 United States	Electronic Service		No	M-25-142
53	Cody	Davis	cdavis@epeconsulting.com	Electric Power Engineers (ELPC/VS)		null null, null United States	Electronic Service		No	M-25-142
54	Danielle	DeMarre	danielle.demarre@allenergysolar.com	All Energy Solar		1264 Energy Lane St Paul MN, 55108 United States	Electronic Service		No	M-25-142
55	Timothy	DenHerder Thomas	timothy@cooperativeenergyfutures.com	Cooperative Energy Futures		3500 Bloomington Ave. S Minneapolis MN, 55407 United States	Electronic Service		No	M-25-142
56	James	Denniston	james.r.denniston@xcelenergy.com	Xcel Energy Services, Inc.		414 Nicollet Mall, 401-8 Minneapolis MN, 55401 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
57	Carrie	Desmond	carrie.desmond@metrotransit.org	Metropolitan Council		560 6th Avenue North Minneapolis MN, 55411 United States	Electronic Service		No	M-25-142
58	Curt	Dieren	curt.dieren@dgr.com	L&O Power Cooperative		1302 S Union St Rock Rapids IA, 51246 United States	Electronic Service		No	M-25-142
59	Cheryl	Dietrich	cheryl.dietrich@nexteraenergy.com	NextEra Energy Resources, LLC		700 Universe Blvd E1W/JB Juno Beach FL, 33408 United States	Electronic Service		No	M-25-142
60	Diane	Dietz	diane.dietz@state.mn.us		Department of Commerce	Suite 280 85 Seventh Place East St. Paul MN, 55101-2198 United States	Electronic Service		No	M-25-142
61	Ian M.	Dobson	ian.m.dobson@xcelenergy.com	Xcel Energy		414 Nicollet Mall, 401-8 Minneapolis MN, 55401 United States	Electronic Service		No	M-25-142
62	Kristin	Dolan	kdolan@meeker.coop	Meeker Cooperative Light & Power Assn		1725 US Hwy 12 E. Ste 100 Litchfield MN, 55355 United States	Electronic Service		No	M-25-142
63	Renee	Doyle	guydoyleelectric@gmail.com	Doyle Electric Inc.		PO Box 295 Amboy MN, 56010 United States	Electronic Service		No	M-25-142
64	Carlton	Doyle Fontaine	carlton.doyle.fontaine@senate.mn	MN Senate		75 Rev Dr Martin Luther King Jr Blvd Room G-17 St Paul MN, 55155 United States	Electronic Service		No	M-25-142
65	Adam	Duininck	aduininck@ncsrcc.org	North Central States Regional Council of Carpenters		700 Olive Street St. Paul MN, 55130 United States	Electronic Service		No	M-25-142
66	Scott	Dunbar	sdunbar@kfwlaw.com	Keyes & Fox LLP		1580 Lincoln St Ste 880 Denver CO, 80203 United States	Electronic Service		No	M-25-142
67	John R.	Dunlop, P.E.	jdunlop@resminn.com	Renewable Energy Services		Suite 300 448 Morgan Ave. S. Minneapolis MN, 55405-2030 United States	Electronic Service		No	M-25-142
68	Hannah	Dunn	hannah.dunn@oakdalemn.gov	City of Oakdale		1584 Hadley Ave N Oakdale MN, 55104 United States	Electronic Service		No	M-25-142
69	Kelly	Dybdahl	kdybdahl@llec.coop	Lyon-Lincoln Electric Cooperative, Inc.		205 W. Hwy. 14 Tyler MN, 56178 United States	Electronic Service		No	M-25-142
70	Brian	Edstrom	briane@cubminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota St Ste W1360 Saint Paul MN, 55101 United States	Electronic Service		No	M-25-142
71	Dick	Edwards	dedwards@ci.maple-grove.mn.us	City of Maple Grove		12800 Arbor Lakes Parkway	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
						P O Box 1180 Maple Grove MN, 55311- 6180 United States				
72	William	Ehrlich	wehrlich@tesla.com	Tesla, Inc.		3500 Deer Creek Rd Palo Alto CA, 94304 United States	Electronic Service		No	M-25- 142
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@nautilusolar.com	Nautilus Solar Energy, LLC		396 Springfield Ave, Ste 2 Summit NJ, 07901 United States	Electronic Service		No	M-25-142
91	Sarah	Groebner	sgroebner@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	bkrumbeer@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@greenergy.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	annief@cupminnesota.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	clinville@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	kmains@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	Renesota 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@legalectric.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	jjpeterson@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@liunagro.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@burnsvillemn.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@dairy.net.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		22636 US Hwy. 59 P.O. Box 788 Worthington MN, 56187-	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
						0788 United States				
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	Volkman	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,	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
						55802-2093 United States				
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	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
						88920 Sioux Falls SD, 57108- 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