



414 Nicollet Mall
Minneapolis, MN 55401

November 1, 2021

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

—Via Electronic Filing—

RE: PETITION
APPROVAL OF DEFERRALS RELATED TO DEPRECIATION,
DISTRIBUTION O&M, AND PROPERTY TAX FOR 2022
DOCKET NO. G002/M-21-750

Dear Mr. Seuffert:

Northern States Power Company, doing business as Xcel Energy, submits the enclosed Petition for approval of a deferral of depreciation expense, distribution O&M expenses, and property tax expenses for calendar year 2022 as an alternative to litigating the rate case proceeding in Docket No. G002/GR-21-678. On this date, concurrent with this Petition, we filed with the Commission an Application in that docket for authority to increase rates for natural gas service in Minnesota.

Pursuant to Minn. Stat. § 216.17, subd. 3, we have electronically filed this document with the Commission, which also constitutes service on the Minnesota Department of Commerce, Division of Energy Resources and the Minnesota Office of the Attorney General--Residential Utilities Division. A copy of this filing has been served on all parties on the attached service lists.

Please feel welcome to direct any questions regarding the Petition to me at (612) 337-2158 or greg.p.chamberlain@xcelenergy.com.

Sincerely,

/s/

GREG P. CHAMBERLAIN
REGIONAL V.P., REGULATORY AND GOVERNMENT AFFAIRS
NORTHERN STATES POWER COMPANY, A MINNESOTA CORPORATION

Enclosures

c: Service Lists

State of Minnesota
before the
Minnesota Public Utilities Commission

Katie Sieben	Chair
Joseph K. Sullivan	Vice-Chair
Valerie Means	Commissioner
Matthew Schuerger	Commissioner
John Tuma	Commissioner

IN THE MATTER OF THE PETITION OF
NORTHERN STATES POWER COMPANY
FOR APPROVAL OF DEFERRALS RELATED
TO DEPRECIATION, DISTRIBUTION O&M,
AND PROPERTY TAX FOR 2022

DOCKET NO. G002/M-21-750

PETITION

INTRODUCTION

Northern States Power Company, doing business as Xcel Energy (Xcel Energy or the Company), petitions the Minnesota Public Utilities Commission (Commission) for approval of a deferral of depreciation expense, distribution O&M expenses, and property tax expenses for calendar year 2022 as an alternative to litigating the rate case proceeding in Docket No. G002/GR-21-678, which would allow us to avoid a base rate increase for our natural gas customers and free up resources for state agencies and stakeholders to engage in other important matters of state policy.

On November 1, 2021, concurrent with this Petition, we filed with the Commission an application (Application) for authority to increase rates for natural gas service in Minnesota. Our Application requests a final increase in gas rates of \$35.6 million or 6.6 percent effective January 1, 2022, without suspension. If the Commission elects to suspend the proposed rate increase under Minn. Stat. § 216B.16, subd. 2, the Company requests, pursuant to Minn. Stat. § 216B.16, subd. 3, an interim rate increase of \$24.9 million or 4.9 percent be effective on January 1, 2022, with final rates becoming effective within 10 months of the date of the Application. The typical residential gas customer uses 73 therms per month. On average, the proposed \$35.6 million rate change would increase the bill for a typical residential natural gas customer by \$5.12 per month or \$61.44 annually. If the requested rates are suspended, the interim increase based on that same monthly amount of 73 therms on average, would be \$3.05 per month or \$36.60 per year.

The Company last requested an increase to natural gas base rates in 2009 in Docket No. G002/GR-09-1153 and, as set forth in our application in Docket No. G002/GR-21-678, given the passage of time, it is appropriate for the Company to increase base rates in 2022. We recognize, however, that our customers are facing rising commodity costs and the impacts of Winter Storm Uri. We also appreciate that the rate case would impact the workloads of state agencies and intervenors. A number of significant and important utility matters are in front of the Commission. These include rate cases filed by several utilities, the Commission's investigation into the unprecedented events of Winter Storm Uri, Certificate of Need proceedings—including a pending proceeding related to additional spent-fuel storage at the Monticello Nuclear Plant—arising out of the Company's Integrated Resource Plan, which we anticipate being resolved this winter, and regulatory proceedings relating to the recently-passed Natural Gas Innovation Act (NGIA).¹ These dockets involve critically important decisions related to the energy future of Minnesota, and we believe there is value in creating more time and space for their consideration.

To alleviate the impact of our pending gas rate case on both agency staff and intervenors, as well as customers—from the proposed increase in rates due to increases in capital investment and operations and maintenance (O&M) costs since the previous case more than a decade ago—we are proposing several measures that would provide the opportunity to stay out of a rate case, and avoid a base rate increase, in 2022. Specifically, with this Petition, the Company respectfully requests approval of the following:

- Deferral of depreciation expense, net of riders, incremental to approved 2010 test year levels;²
- Deferral of distribution O&M expense incremental to approved 2010 test year levels; and
- Deferral of property tax expense, net of riders, incremental to approved 2010 test year levels.

Although the specific tools used to support this rate case stay-out request are different than those used in recent years to similarly avoid electric rate cases, the impact would be essentially the same. With these deferrals—for which the Company will not seek a carrying charge—the Company would leave base rates unchanged in 2022, which would further mitigate the impact to customers of the Company's recovery of extraordinary gas costs related to Winter Storm Uri; and the Company, Commission and our Stakeholders could devote the time and resources otherwise required to

¹ Minn. Stat. § 216B.2427.

² As approved in the Company's last natural gas rate case, Docket No. G002/GR-09-1153.

litigate the pending general rate case to focus on other pending rate cases, the Commission's investigation into prudence of utilities' gas purchases last winter, pending and forthcoming petitions for Certificates of Need, and other important policy matters.

We recognize that the Commission and our stakeholders will need to understand our rate request in Docket No. G002/GR-21-678 in order to evaluate the proposed deferrals discussed further below. Exhibit 1 to this Petition identifies our proposed interim and final rate increases, and compares them to the expected revenue requirement impact of this alternative proposal. We commit to meeting with the Department of Commerce, Division of Energy Resources (Department); the Office of Attorney General—Residential Utilities Division (OAG), and other interested parties and stakeholders to discuss the details and impacts of our proposal. Should the Commission then approve this Petition prior to December 31, 2021, the Company commits to withdraw its general rate case filing and associated Base Cost of Gas filing and to not file a new general rate case until on or after November 1, 2022.

I. SERVICE ON OTHER PARTIES

Pursuant to Minn. R. 7829.1300, subp. 2, the Company has served a copy of this filing on the Department and OAG; all parties on the service list for the 2022 gas rate case (Docket No. G002/GR-21-678); and all persons on the Company's miscellaneous gas service list, as shown on the attached Certificate of Service.

II. GENERAL FILING INFORMATION

Pursuant to Minn. R. 7829.1300, subp. 3, the Company provides the following information.

A. Name, Address, and Telephone Number of Utility

Northern States Power Company, doing business as:
Xcel Energy
414 Nicollet Mall
Minneapolis, MN 55401
(612) 330-5500

B. Name, Address, and Telephone Number of Utility Attorney

Matt Harris
Lead Assistant General Counsel
Xcel Energy
414 Nicollet Mall (401-8th Floor)
Minneapolis, MN 55401
(612) 330-7641
matt.b.harris@xcelenergy.com

C. Date of Filing and Proposed Effective Date

The date of this filing is November 1, 2021. The filing requests approval of the deferral of expenses that would not be included in a rate recovery proceeding until on or after November 1, 2022. A one-paragraph summary is attached to this filing pursuant to Minn. R. 7829.1300, subp. 1.

D. Statutes Controlling Schedule for Processing the Filing

The filing described herein is made pursuant to Minn. Stat. §§ 216B.03, 216B.10, and Minn. R. 7825.0300. The statutes and rules prescribe no schedule for processing the filing. This filing is a miscellaneous tariff filing as defined by Minn. Rule 7829.0100, subp. 11, since this filing does not require determination of the utility's revenue requirement. Under Minn. Rule 7829.1400, comments on a miscellaneous filing are due within 30 days of its filing, with reply comments due 10 days thereafter. Xcel Energy respectfully requests approval of this Petition on an expedited basis and prior to December 31, 2021, to ensure administrative efficiency and avoid the time and expense of litigating the general rate case filed on November 1, 2021.

E. Utility Employee Responsible for Filing

Greg Chamberlain
Regional Vice President
Xcel Energy
414 Nicollet Mall (401-7th Floor)
Minneapolis, MN 55401
(612) 337-2158
greg.p.chamberlain@xcelenergy.com

F. Miscellaneous Information

Pursuant to Minn. R. 7829.0700, the Company requests that the following persons be placed on the Commission's official service list for this proceeding:

Matt Harris	Lynnette Sweet
Lead Assistant General Counsel	Regulatory Records
Xcel Energy	Xcel Energy
414 Nicollet Mall (401-8 th Floor)	414 Nicollet Mall (401-7 th Floor)
Minneapolis, MN 55401	Minneapolis, MN 55401
matt.b.harris@xcelenergy.com	regulatory.records@xcelenergy.com

Any information requests in this proceeding should be submitted to the Regulatory Records email address above.

III. DESCRIPTION AND PURPOSE OF FILING

The Company understands that our customers are confronted with rising commodity costs and the impacts of Winter Storm Uri that will impact their bills during the upcoming heating season. In addition, the state is facing numerous important utility regulatory matters that will need to be carefully considered by the Commission and other state agencies. These range from rate cases that utilities have filed, to the Commission's investigation and contested case concerning the costs gas utilities incurred when the gas markets spiked in February 2021, to critical Certificate of Need filings, following the resolution of our pending Integrated Resource Plan that will assist the state in significantly reducing carbon emissions over the next decade, to the regulatory filings required to implement the NGIA. We recognize these proceedings require significant agency resources to process and review, and reviewing them all at the same time is challenging.

As a result, and given stakeholders' interest in utility proposals to find opportunities to phase contested cases, the Company presents this rate case alternative proposal for the Commission's consideration. Our proposal can be construed as a reasonable and appropriate resolution of rates for 2022 that may provide a preferred alternative to the time and expense of beginning litigation of the rate case in 2022, that also provides the time and space for the Commission and other agencies to address other important dockets over the next year.

The Company understands that to fully evaluate the merits of this Petition, parties and the Commission will need to understand how this Petition compares to our general rate request. For this reason, and because the Company wishes to preserve its

ability to collect adequate revenues in 2022 should the Commission not grant this Petition, we filed our general rate case on November 1, 2021. Given the short time frame between now and the statutory interim rate implementation deadline of January 1, 2022, we commit to meeting with any interested parties to expedite their review of the overall rate case and to facilitate a comparison between the case and this Petition.

Consequently, we ask that the Commission establish a process that allows parties to comment, and the Commission to decide, if this Petition is preferable to pursuing the general rate case process before interim rates take effect. We recognize that the time for this review is short, but we believe a decision on this Petition in 2021 is important to minimizing customer confusion and preserving our ability to collect adequate revenues in 2022 should interested parties and the Commission find merit in exploring this alternative path.

If the Commission approves this Petition, the Company commits to withdrawing its general rate case filing and to not filing a new general rate case until on or after November 1, 2022. If approved, in other words, this Petition would leave base rates at approved 2010 test year levels, with a deferral of certain depreciation, distribution O&M, and property tax expenses, and allow the Company, Commission and other stakeholders to direct their resources to the other pending rate case requests and other important matters, rather than litigating another general rate case. For these reasons, and because our Petition seeks no new revenues in 2022 and thus benefits customers—in contrast to our interim rate request—we believe the alternative proposal is in the public interest and merits Commission approval.

IV. SPECIFIC REQUESTS

To avoid filing a rate case this year—while preserving the Company’s opportunity to earn a reasonable return—the Company requests the Commission authorize the deferral of three categories of expenses:

- Depreciation expense in 2022 incremental to approved 2010 test year levels;
- Distribution O&M expense in 2022 incremental to approved 2010 test year levels; and
- Property tax expense in 2022 incremental to approved 2010 test year levels.

As shown below in Table 1, in total, this proposal would result in an estimated overall deferral of \$31.6 million, which the Company would seek to amortize and recover in its next general rate case.

Table 1
Rate Case Alternative (Dollars in Thousands)

	2022 Interim Petition	+	SEP and TD&G Adjustment ³	=	Adjusted Rate Case Request	-	E002/ GR-09-1153 Approved Amounts ⁴	=	Deferral Request
Depreciation	\$46,805		(\$582)		\$47,387		\$32,684		\$14,703
Distribution O&M	\$39,105				\$39,105		\$24,062		\$15,043
Property Tax	\$14,871		\$199		\$14,672		\$12,776		\$1,896
Total									\$31,643

In this circumstance, deferral of these expenses is warranted given the public interest in avoiding a rate case this year. Under Minn. R. 7825.0300, subp. 4, the Commission retains the authority to approve a public utility’s request for an exception to a provision of the applicable uniform system of accounts for good cause. As the Commission has repeatedly noted, “Deferred accounting is a regulatory tool used primarily to hold utilities harmless when they incur out-of-test-year expenses that, because they are unforeseen, unusual, and large enough to have a significant impact on the utility’s financial condition, should be eligible for possible rate recovery in the next rate case. Deferred accounting has also been permitted when utilities have incurred sizeable expenses to meet important public policy mandates.”⁵

Moreover, granting a deferral does not guarantee cost recovery, but instead gives the Company the opportunity to demonstrate in a future general rate case that the expenses were actually incurred and prudently benefited customers. As a result, the requested deferral permits stakeholders the opportunity to scrutinize actual costs incurred. It merely delays the review of those costs by a year until the Company next files a case. Relatedly, the specific approach to recovery of these deferred costs can be addressed in that case, which would allow the Commission to make a decision on the appropriate amortization period at a time when it has a better understanding of the impacts of such amortization on customers’ rates. Therefore, should the Commission

³ As explained below, the depreciation deferral request includes adjustments to remove the impact of rolling SEP Rider amounts into base rates and to update TD&G depreciation consistent with the Company’s request in Docket No. E,G002/D-21-584. These adjustments also have corresponding impacts on the requested property tax deferral.

⁴ *Findings of Fact, Conclusions of Law, and Order*, Dec. 6, 2010, Docket No. G002/GR-09-1153.

⁵ *Order Approving Pilot Program, Granting Deferred Accounting, and Setting Additional Requirements*, Oct. 27, 2020, Docket No. E017/M-20-181.

determine that avoiding a rate case this year is in the public interest, it is within its authority, under Minn. R. 7825.0300, to find that good cause supports deferring these expenses.

A. Depreciation Deferral

The first component of the Company's proposal to defer expenses in order to stay out of a rate case in 2022 is a deferral of depreciation expense. Specifically, we propose to defer the interim depreciation expense, net of riders, included in the 2022 test year proposed in our pending gas rate case that is incremental to the depreciation expense approved by the Commission for the 2010 test year in the Company's last gas rate case. In other words, we are not proposing to defer any depreciation expense that currently is included in either the Gas Utility Infrastructure Cost (GUIC) Rider (which is not included in interim rates) or the State Energy Policy (SEP) Rider (which we had proposed to include in interim rates but are not including in the deferral),⁶ and instead are limiting our request for a depreciation deferral for the difference in depreciation expense between that reflected in the 2022 test year (after riders are removed) and that reflected in the Commission-approved 2010 test year.

The vast majority of these incremental depreciation expenses relate to pipes in the ground and other plant that we have already installed in the more than ten years between the Company's last gas rate case and our pending case. The value these investments are providing to our customers is self-evident, and therefore deferring this expense to avoid a rate case this year is appropriate. In essence, we are proposing to delay—by another year—the recovery of new assets placed in service since our last rate case.

In order to reflect an appropriate amount of deferred depreciation expense, however, we also ask that the Commission approve two changes in depreciation expense. Specifically, we are requesting the Commission approve both our proposed life extension for the peaking plants at Wescott, Sibley, and Maplewood, which would reduce annual depreciation expense as reflected in the testimony Ms. Laurie Wold submitted in Docket No. G002/GR-21-678, and our annual request for an update to the remaining lives and depreciation rates for Transmission, Distribution, and General (TD&G) functional classes of plant assets, currently pending in Docket No. E,G002/D-21-584.⁷ The overall impact to the depreciation expense we are requesting be deferred is reflected below in Table 2.

⁶ Recovery of costs related to these riders will continue in the riders during the proposed deferral period.

⁷ In addition to these changes, Table 2 reflects several other rate case and interim adjustments, including the removal of Distributed Intelligence expenses from interim rates, which are discussed in the testimony of Mr. Benjamin Halama in Docket No. G002/GR-21-678.

Table 2
Depreciation Deferral (Dollars in Thousands)

Unadjusted Depreciation			\$66,813
Rate Case Adjustments			
Peaking Plant Remaining Life Extension		(\$12,928)	
Other Rate Case Adjustments		(\$755)	(\$13,683)
Rate Case Depreciation			\$53,130
Interim Adjustments			
MN Gas Depreciation Study TD&G Interim		(\$933)	
Gas GUIC Rider Interim Removal		(\$5,378)	
MN Gas Distribution Intelligence Removal		(\$13)	(\$6,325)
Interim Petition Depreciation			\$46,805
Rate Case Alternative Adjustments			
MN Gas Depreciation Study TD&G Add Back		\$933	
SEP Gas Depreciation Removal		(\$351)	\$582
Adjusted Rate Case Alternative Depreciation			\$47,387
Less 2009 Rate Case Depreciation			(\$32,684)
Requested Depreciation Deferral			\$14,703

As explained in the testimony of Ms. Mary Palkovich in Docket No. G002/GR-21-678, the Company is making significant investments to refurbish the peaking plants to ensure they are able to provide reliable service for the Company for many more years. Consequently, as explained by Ms. Wold, we are requesting the remaining lives of the plant assets be extended to 2041 (from 2023, 2027, 2029, and 2032, depending on the particular asset) in our pending general rate case.

Because some of the investments we are making in the plants are occurring in 2021 and 2022, a deferral of depreciation expense without a life extension would result in the deferred expense being too high given the now-expected lives of the plants. We,

therefore, request the Commission approve our requested life extension for the peaking plants in connection with this deferral request.

The update to TD&G plant is driven by the updated remaining lives reflected in the annual compliance filing made July 29, 2021 in Docket No. E,G002/D-21-584, which is pending before the Commission. In the pending general rate case in Docket No. G002/GR-21-678, we assume this update will be adopted in its entirety, as it has in prior such dockets, and we ask that the Commission make a similar determination for this year's filing in connection with this deferral request.

As shown above, we currently anticipate this deferral will amount to \$14.7 million. This amount, however, is an estimate based on both plant currently in service and plant that will be added in 2021 and 2022. If approved, the amount deferred would be limited to the difference between the Company's actual 2022 depreciation (calculated consistent with Table 2 above) and the authorized depreciation expense from the Company's last gas rate case.

B. Distribution O&M Deferral

Similar to our request for a depreciation deferral, the Company also requests approval of a deferral of 2022 actual distribution O&M expense as reflected in the 2022 test year included in our pending rate case that is incremental to the distribution O&M expense approved by the Commission for the 2010 test year in the Company's last gas rate case. These costs have increased over the past decade largely due to increases in the cost of labor, as well as increases in the amount and cost of Damage Prevention (Gopher One Call) locate work.

In that time, we have had labor costs increase based on merit increases, the addition of headcount to enhance the efficiency, oversight, and safety of our work, and efforts to significantly enhance the speed of our response to gas emergencies (\$7.7 million). With respect to Damage Prevention, costs have increased due to an increase in locates, increasing costs associated with our outside service contract for Damage Prevention, and efforts to improve accuracy and other metrics associated with the program (\$4.8 million). These all are necessary costs for the Company to continue providing reliable service to our customers and would be appropriate to include in rates now. Given the value of avoiding a rate case, however, we support deferring them.

In aggregate, these and other changes in distribution O&M expense would result in a deferral of \$15.0 million. Consistent with the Company's request for a depreciation

deferral, this request will be limited to actual distribution O&M expense, ensuring customers will not pay more in rates than the Company's actual expenses.

C. Property Tax Deferral

Finally, the Company requests approval to defer any property tax expense incurred in 2022, on a rider removed basis, that is incremental to the property tax expense approved by the Commission for the 2010 test year in the Company's last gas rate case. In essence, this is equivalent to the property tax true-up mechanism approved by the Commission in connection with the Company's last electric rate case,⁸ and recent electric rate case stay-out requests.⁹ There is wide agreement that it is appropriate to recover actual property tax expense in rates, and this deferral will be limited to the actual amount of property taxes, ensuring customers do not pay any more in rates than the Company actually owes, which is what the previously-approved true-up mechanisms accomplished. At this time, we anticipate this deferral would include \$1.9 million in increased property tax payments.

CONCLUSION

Xcel Energy respectfully requests that the Commission approve the Company's proposed deferral of incremental depreciation, distribution O&M, and property tax expense since 2010, as proposed in this Petition. By doing so, the Company will leave base rates unchanged in 2022 and save the expense, time, and other resources associated with litigating Xcel Energy's natural gas general rate case in 2022.

Dated: November 1, 2021

Northern States Power Company

⁸ Docket No. E002/GR-15-826.

⁹ Dockets Nos. E002/M-20-743, E002/M-19-688.

State of Minnesota
before the
Minnesota Public Utilities Commission

Katie Sieben	Chair
Joseph K. Sullivan	Vice-Chair
Valerie Means	Commissioner
Matthew Schuerger	Commissioner
John Tuma	Commissioner

IN THE MATTER OF THE PETITION OF
NORTHERN STATES POWER COMPANY
FOR APPROVAL OF DEFERRALS RELATED
TO DEPRECIATION, DISTRIBUTION O&M,
AND PROPERTY TAX FOR 2022

DOCKET NO. G002/M-21-750

SUMMARY OF FILING

Please take notice that on November 1, 2021, Northern States Power Company, doing business as Xcel Energy, filed with the Minnesota Public Utilities Commission a petition for approval of deferrals of depreciation, distribution O&M, and property tax expense for calendar year 2022, allowing us to withdraw the natural gas rate case filed in Docket Nos. G002/GR-21-678 and G002/M-21-749, and the associated incremental impact to bills for our natural gas customers in 2022.

2022 Stay-Out

\$ in millions

<u>Description</u>	Rate Case		Deferrals*
	Proposed Test Year 2022 to Existing Rates	Proposed Interim 2022	
Total capital related	\$24.1		\$14.7
Distribution O&M	15.0		15.0
Other O&M	6.8		
Cost of capital - interim rate base	7.7		
Current & deferred income tax	2.5		
Property Tax	2.2		1.9
Sales Change	(23.7)		
Other, net	0.8		
Net deficiency	35.6		
Interim adjustments			
Cost of capital		(\$7.7)	
Other		(3.0)	
	\$35.6	\$24.9	\$31.6

*Includes deferrals for depreciation, distribution O&M and property taxes.

CERTIFICATE OF SERVICE

I, Mustafa Adam, hereby certify that I have this day served copies or summaries of the foregoing documents on the attached list(s) of persons.

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

xx electronic filing

Docket No. G002/GR-21-678

Xcel Energy Miscellaneous Gas Service List

Dated this 1st day of November 2021

/s/

Mustafa Adam
Regulatory Administrator

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Tamie A.	Aberle	tamie.aberle@mdu.com	Great Plains Natural Gas Co.	400 North Fourth Street Bismarck, ND 585014092	Electronic Service	No	OFF_SL_21-678_GR-21-678
Kristine	Anderson	kanderson@greatermngas.com	Greater Minnesota Gas, Inc. & Greater MN Transmission, LLC	1900 Cardinal Lane PO Box 798 Faribault, MN 55021	Electronic Service	No	OFF_SL_21-678_GR-21-678
Gail	Baranko	gail.baranko@xcelenergy.com	Xcel Energy	414 Nicollet Mall 7th Floor Minneapolis, MN 55401	Electronic Service	No	OFF_SL_21-678_GR-21-678
Robert S.	Carney, Jr.			4232 Colfax Ave. S. Minneapolis, MN 55409	Paper Service	No	OFF_SL_21-678_GR-21-678
John	Coffman	john@johncoffman.net	AARP	871 Tuxedo Blvd. St. Louis, MO 63119-2044	Electronic Service	No	OFF_SL_21-678_GR-21-678
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-678_GR-21-678
Brooke	Cooper	bcooper@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022191	Electronic Service	No	OFF_SL_21-678_GR-21-678
George	Crocker	gwillc@nawo.org	North American Water Office	PO Box 174 Lake Elmo, MN 55042	Electronic Service	No	OFF_SL_21-678_GR-21-678
Rebecca	Eilers	rebecca.d.eilers@xcelenergy.com	Xcel Energy	414 Nicollet Mall - 401 7th Floor Minneapolis, MN 55401	Electronic Service	No	OFF_SL_21-678_GR-21-678
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 551012198	Electronic Service	No	OFF_SL_21-678_GR-21-678

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Edward	Garvey	edward.garvey@AESLconsulting.com	AESL Consulting	32 Lawton St Saint Paul, MN 55102-2617	Electronic Service	No	OFF_SL_21-678_GR-21-678
Edward	Garvey	garveyed@aol.com	Residence	32 Lawton St Saint Paul, MN 55102	Electronic Service	No	OFF_SL_21-678_GR-21-678
Todd J.	Guerrero	todd.guerrero@kutakrock.com	Kutak Rock LLP	Suite 1750 220 South Sixth Street Minneapolis, MN 554021425	Electronic Service	No	OFF_SL_21-678_GR-21-678
Annete	Henkel	mui@mutilityinvestors.org	Minnesota Utility Investors	413 Wacouta Street #230 St. Paul, MN 55101	Electronic Service	No	OFF_SL_21-678_GR-21-678
Michael	Hoppe	lu23@ibew23.org	Local Union 23, I.B.E.W.	445 Etna Street Ste. 61 St. Paul, MN 55106	Electronic Service	No	OFF_SL_21-678_GR-21-678
Richard	Johnson	Rick.Johnson@lawmoss.com	Moss & Barnett	150 S. 5th Street Suite 1200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-678_GR-21-678
Sarah	Johnson Phillips	sarah.phillips@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-678_GR-21-678
Nicolle	Kupser	nkupser@greatermngas.com	Greater Minnesota Gas, Inc. & Greater MN Transmission, LLC	1900 Cardinal Ln PO Box 798 Faribault, MN 55021	Electronic Service	No	OFF_SL_21-678_GR-21-678
Peder	Larson	plarson@larkinhoffman.com	Larkin Hoffman Daly & Lindgren, Ltd.	8300 Norman Center Drive Suite 1000 Bloomington, MN 55437	Electronic Service	No	OFF_SL_21-678_GR-21-678
Eric	Lipman	eric.lipman@state.mn.us	Office of Administrative Hearings	PO Box 64620 St. Paul, MN 551640620	Electronic Service	Yes	OFF_SL_21-678_GR-21-678

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Pam	Marshall	pam@energycents.org	Energy CENTS Coalition	823 7th St E St. Paul, MN 55106	Electronic Service	No	OFF_SL_21-678_GR-21-678
Mary	Martinka	mary.a.martinka@xcelenergy.com	Xcel Energy Inc	414 Nicollet Mall 7th Floor Minneapolis, MN 55401	Electronic Service	No	OFF_SL_21-678_GR-21-678
David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022093	Electronic Service	No	OFF_SL_21-678_GR-21-678
Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP	33 South Sixth St Ste 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-678_GR-21-678
David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency	220 South Sixth Street Suite 1300 Minneapolis, Minnesota 55402	Electronic Service	No	OFF_SL_21-678_GR-21-678
Samantha	Norris	samanthanorris@alliantenergy.com	Interstate Power and Light Company	200 1st Street SE PO Box 351 Cedar Rapids, IA 524060351	Electronic Service	No	OFF_SL_21-678_GR-21-678
Greg	Palmer	gpalmer@greatermngas.com	Greater Minnesota Gas, Inc. & Greater MN Transmission, LLC	1900 Cardinal Ln PO Box 798 Faribault, MN 55021	Electronic Service	No	OFF_SL_21-678_GR-21-678
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_21-678_GR-21-678
Richard	Savelkoul	rsavelkoul@martinsquires.com	Martin & Squires, P.A.	332 Minnesota Street Ste W2750 St. Paul, MN 55101	Electronic Service	No	OFF_SL_21-678_GR-21-678

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th PI E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-678_GR-21-678
James M	Strommen	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered	150 S 5th St Ste 700 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-678_GR-21-678
Lynnette	Sweet	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	Yes	OFF_SL_21-678_GR-21-678
Lisa	Veith	lisa.veith@ci.stpaul.mn.us	City of St. Paul	400 City Hall and Courthouse 15 West Kellogg Blvd. St. Paul, MN 55102	Electronic Service	No	OFF_SL_21-678_GR-21-678

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
John	Coffman	john@johncoffman.net	AARP	871 Tuxedo Blvd. St. Louis, MO 63119-2044	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Gas_Xcel Misc Gas
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Gas_Xcel Misc Gas
Brooke	Cooper	bcooper@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022191	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Gas_Xcel Misc Gas
George	Crocker	gwillc@nawo.org	North American Water Office	PO Box 174 Lake Elmo, MN 55042	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Gas_Xcel Misc Gas
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 551012198	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Gas_Xcel Misc Gas
Edward	Garvey	edward.garvey@AESLconsulting.com	AESL Consulting	32 Lawton St Saint Paul, MN 55102-2617	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Gas_Xcel Misc Gas
Todd J.	Guerrero	todd.guerrero@kutakrock.com	Kutak Rock LLP	Suite 1750 220 South Sixth Street Minneapolis, MN 554021425	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Gas_Xcel Misc Gas
Annete	Henkel	mui@mutilityinvestors.org	Minnesota Utility Investors	413 Wacouta Street #230 St. Paul, MN 55101	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Gas_Xcel Misc Gas
Michael	Hoppe	lu23@ibew23.org	Local Union 23, I.B.E.W.	445 Etna Street Ste. 61 St. Paul, MN 55106	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Gas_Xcel Misc Gas
Richard	Johnson	Rick.Johnson@lawmoss.com	Moss & Barnett	150 S. 5th Street Suite 1200 Minneapolis, MN 55402	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Gas_Xcel Misc Gas

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Sarah	Johnson Phillips	sarah.phillips@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Gas_Xcel Misc Gas
Peder	Larson	plarson@larkinhoffman.com	Larkin Hoffman Daly & Lindgren, Ltd.	8300 Norman Center Drive Suite 1000 Bloomington, MN 55437	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Gas_Xcel Misc Gas
Pam	Marshall	pam@energycents.org	Energy CENTS Coalition	823 7th St E St. Paul, MN 55106	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Gas_Xcel Misc Gas
David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022093	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Gas_Xcel Misc Gas
Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP	33 South Sixth St Ste 4200 Minneapolis, MN 55402	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Gas_Xcel Misc Gas
David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency	220 South Sixth Street Suite 1300 Minneapolis, Minnesota 55402	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Gas_Xcel Misc Gas
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Richard	Savelkoul	rsavelkoul@martinsquires.com	Martin & Squires, P.A.	332 Minnesota Street Ste W2750 St. Paul, MN 55101	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Gas_Xcel Misc Gas
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th PI E Ste 350 Saint Paul, MN 55101	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Gas_Xcel Misc Gas
James M	Strommen	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered	150 S 5th St Ste 700 Minneapolis, MN 55402	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Gas_Xcel Misc Gas

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