



414 Nicollet Mall
Minneapolis, MN 55401

July 23, 2024

—Via Electronic Filing—

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

RE: REPLY COMMENTS
IN THE MATTER OF XCEL ENERGY'S PETITION FOR BILL CREDIT PILOT
PROGRAM
DOCKET NO. E002/M-24-173, E002/M-22-266, E002/RP-19-368

Dear Mr. Seuffert:

Northern States Power Company, doing business as Xcel Energy, submits the enclosed Reply Comments in Response to the Public Utility Commission's June 20, 2024 Notice of Extended Comment Period regarding filing requirements for Bill Credit Pilot Program.

We have electronically filed this document with the Minnesota Public Utilities Commission, and copies have been served on the parties on the attached service list. Please contact Nicholas Martin, Director of Strategic Outreach and Advocacy at Nicholas.F.Martin@xcelenergy.com if you have any questions regarding this filing.

Sincerely,

/s/

NICHOLAS MARTIN
DIRECTOR, STRATEGIC OUTREACH & ADVOCACY

Enclosure
cc: Service Lists

STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION

Katie J. Sieben	Chair
Hwikwon Ham	Commissioner
Valerie Means	Commissioner
Joseph K. Sullivan	Commissioner
John A. Tuma	Commissioner

IN THE MATTER OF XCEL ENERGY'S
PETITION FOR AN AUTOMATIC BILL
CREDIT PILOT PROGRAM

DOCKET NO. E002/M-24-173,
E002/M-22-266, E002/RP-19-368

REPLY COMMENTS

INTRODUCTION

Northern States Power Company, doing business as Xcel Energy, submits these Reply Comments in response to the comments from the Minnesota Department of Commerce, Office of the Attorney General - Residential Utilities Division, Fresh Energy and its co-signers, the Center for Energy and Environment and Energy CENTS Coalition, Mr. Roger Colton on behalf of Community Action Partnership of Ramsey & Washington Counties, and one public commenter.

We thank the parties for their careful review. All parties except the public commenter recommend Commission approval of the Automatic Bill Credit Pilot proposed by Xcel Energy and 27 members of the Equity Stakeholder Advisory Group (ESAG). Some parties recommend approval with slight modifications; most of these are reasonable requests that the Company agrees will further strengthen the pilot, and we discuss below how we plan to incorporate them.

COMMENTS

I. FRESH ENERGY

Fresh Energy applauds the Company and ESAG for what it views as an innovative pilot addressing urgent needs, and recommends Commission approval. Fresh Energy's comments are co-signed by six other ESAG member organizations – Native Sun Community Power Development, Lake Street Council, Cooperative Energy Futures, Community Action Partnership of Ramsey & Washington Counties, Renewable Energy Partners, and the Coalition of Asian-American Leaders – as well as

two parties who were not ESAG members but have been active on equity issues in other dockets, the Environmental Law & Policy Center and Vote Solar.

A. Core objectives

Fresh Energy's comments highlight the perception by many low-income energy customers and ESAG members that existing energy bill payment assistance programs can be difficult to access, and that utilities can lower barriers to access. Fresh Energy notes that in 2023, approximately 23% of Minnesotans eligible for federally funded Low-Income Home Energy Assistance Program (LIHEAP) assistance actually received it. This is for a variety of reasons including lack of awareness assistance is available, uncertainty about eligibility, challenges to compile required documentation, language barriers, fear or distrust of the programs, shame around accessing them, and simple funding shortfalls. Some utility programs have lower barriers to entry but require LIHEAP enrollment as a prerequisite.¹

The Company emphasizes we do not in any way question the importance of existing energy assistance programs, whether LIHEAP- or utility-funded, to those who receive such assistance. LIHEAP grants and Xcel Energy programs like PowerOn, Gas Affordability, the Medical Affordability Program, and the Low-Usage Affordability Credit are crucially important to recipients, and all parties – the Company, ESAG, and all commenters in this docket – agree that the Automatic Bill Credit Pilot should layer on top of, not replace, assistance from those programs.

In addition, the Company, State of Minnesota, and other energy assistance partners are working to make existing programs easier to access. The Department of Commerce is working to streamline the energy assistance application, including an online offering that is already demonstrating value to LIHEAP applicants; Community Action Partnership agencies provide personalized assistance to guide customers through the energy assistance application process; and the Company in 2023 instituted auto-enrollment for PowerOn, and is exploring self-attestation as well. Through these efforts, more customers in need are receiving assistance. Nonetheless, the data cited by Fresh Energy and other commenters indicates there is still a large population of customers whose income makes them eligible for energy assistance but who are not receiving it. The Automatic Bill Credit Pilot addresses this gap by testing a new way of delivering assistance without enrollment requirements, based simply on living in a Census Block Group (CBG) where median electric energy burden exceeds four percent, and evaluating that approach to see if it delivers improvement on key affordability metrics.

¹ Fresh Energy comments at 1-3.

Fresh Energy presents a table showing 62 of the 77 CBGs² identified in our Petition as eligible for bill credits, as well as the percent of customers currently receiving energy assistance in those CBGs. Despite these CBGs all having median electric energy burden greater than or equal to four percent, the percent of customers currently receiving assistance ranges from quite low levels to, at the highest, 27.62 percent. Of course, not all customers in these CBGs would meet LIHEAP income qualification requirements, but the high median energy burdens and low incomes suggest that many would. The proposed pilot would provide assistance to all these customers, except those who opt out.

B. Participatory process

Fresh Energy notes the support for the pilot among ESAG members who helped develop it: “This Pilot Petition has an unprecedented level of support, with many community organizations providing input on all aspects of the program design and signing their support. The leaders of the organizations which signed on to the Petition work with people in their communities day after day and deeply understand the challenges their communities face. As we work to broaden participation in the energy system, Fresh Energy believes the process that led to the development of this Pilot Petition is precisely the type of collaborative process which should be undertaken to address other aspects of how to create equitable energy policy.”³

The Company agrees. We again thank ESAG members for helping the Company better understand our low-income customers’ experience with federal, state and utility energy assistance programs, and for offering ways we can lower barriers and increase participation. We likewise agree the collaborative process of developing this pilot is a model worth replicating to enhance procedural justice in energy decision-making, and we hope to build on it as we develop other initiatives emerging from ESAG and the forthcoming Environmental Justice Accountability Board (EJAB).

² Fresh Energy comments at 3-4. Fresh Energy used data from an Information Request response in which the Company omitted data on 15 CBGs that have 15 or fewer customers, per customer privacy rules. The Company provided trade secret/non-public responses including all 77 CBGs, but Fresh Energy evidently preferred to focus on the 62 that are public so as not to mark its own Comments trade secret. Note that in any case the Office of the Attorney General – Residential Utilities Division in its Comments proposes eliminating the 15 CBGs with 15 or fewer customers from the pilot, which the Company agrees is reasonable. See response to the OAG in section IV.

³ Fresh Energy comments at 5.

II. JOINT COMMENTERS

The Center for Energy & Environment and Energy CENTS Coalition (Joint Commenters) filed joint comments recommending Commission approval of the pilot.

A. Consistency with Order

The Joint Commenters note the pilot’s link to the language of the Commission’s Order under which the Company convened ESAG: “Xcel [Energy] shall engage in community outreach and establish a stakeholder group to... Design for the equitable delivery of electricity services and programs for energy burdened customers.”⁴ In the Joint Commenters’ view it is inequitable for some customers to pay significantly more for energy as a percent of their income than others, and note that the pilot would enhance equity by providing a mechanism to support electricity costs “for customers living in high energy-burdened areas to be more aligned with electricity costs customers pay in other parts of the Company’s service territory.”⁵

The Company generally agrees with this perspective, with two caveats. First, the pilot seeks greater equity in energy burden through bill credits, not different electricity rates, for customers in the qualifying CBGs. This keeps the pilot in our view firmly within the requirement of *Minn. Stat. § 216B.03* that directs that rates must be “equitable and consistent in application to a class of consumers,” as well as consistent with the fundamental tenet of rate design that rates should reflect the cost to serve a class of customers. The bill credits are designed to help counteract discriminatory policies and practices outside the energy sector that have led to concentrated poverty in certain areas of the Company’s Minnesota service territory.⁶

Second, while the Company cannot make energy burden the same for all its customers, since energy burden depends most strongly on household income, we can pilot a new approach to reduce energy burden for our most burdened customers by significantly lowering the barriers to receive assistance. This pilot will provide a unique opportunity to study this focused approach to energy affordability and measure the impact on participants.

⁴ April 15, 2022 ORDER APPROVING PLAN WITH MODIFICATIONS AND ESTABLISHING REQUIREMENTS FOR FUTURE FILINGS. *In the Matter of the 2020–2034 Upper Midwest Integrated Resource Plan of Northern States Power Company d/b/a Xcel Energy*. Order Point 25.A.

⁵ Joint Commenters at 2.

⁶ Northern States Power Company, doing business as Xcel Energy. PETITION FOR AN AUTOMATIC BILL CREDIT PILOT PROGRAM. Docket Nos. E002/M-22-266, E002/RP-19-368, E002/M24-173. April 16, 2024. Pages 23-24.

B. Holistic approach to energy burden

The Joint Commenters note that the pilot provides financial relief but does not solve the underlying causes of high energy burden, which requires targeted investments in energy efficiency (to lower energy costs) and workforce development (to increase incomes).⁷ We agree. We emphasized the need for this holistic approach in our Petition,⁸ and look forward to further developing the energy efficiency and workforce development initiatives developed during the ESAG process, including working with the EJAB, for which we are currently soliciting applications.⁹

The Joint Commenters request the Company provide “a general timeline and plan for targeting and implementing energy efficiency improvements in participating customers’ homes and recruiting participants for [the Company’s] workforce development programs.”¹⁰ Regarding energy efficiency, ESAG developed the basic outline of an initiative to increase energy efficiency program participation in mapped areas of high energy burden, working in partnership with community-based organizations on outreach, and potentially pre-qualifying customers in certain areas to reduce participation barriers. We remain interested in this concept and propose to develop it further with EJAB (while noting that EJAB will set its own priorities). Regarding timing, we hope to explore further development of this program, and discussions with the Department of Commerce, in 2025 after our similar mobile homes pilot in Faribault and Maplewood has concluded. The evaluation and reporting on the mobile homes pilot will be delivered to the Department of Commerce in the coming months, and based on those findings, a new energy efficiency pilot would require approval from the Department.

Regarding workforce development, the Company’s efforts are ongoing on various timelines, and some do not require explicit regulatory approvals. Current efforts that aim to increase Black, Indigenous and People of Color (BIPOC) representation in the energy workforce include the Energy Careers Academy for electrical line workers and gas service workers; the energy efficiency workforce development program implemented with the Center for Energy & Environment; the PowerUp program which provides energy-related construction skills and apprenticeship readiness training to approximately 150 individuals from groups under-represented in the energy industry; clean energy careers training components proposed as part of the

⁷ Joint Commenters at 3.

⁸ Petition at 5.

⁹ See application form at <https://forms.office.com/r/i8tSKlgHEX> and Frequently Asked Questions document at [EJAB FAQs](#).

¹⁰ Joint Commenters at 9-10.

Resilient Minneapolis Project;¹¹ and other ongoing efforts in partnership with a wide variety of non-profits, educational institutions, and industry partners.

C. Cost recovery

The Joint Commenters support the proposed cost recovery mechanism through Department of Energy settlement payments, which in their view provides “a unique opportunity to fund the proposed pilot program without directly increasing rates for other customers.”¹²

D. Layering with other energy assistance

The Joint Commenters strongly support the pilot, but note this is “contingent on it holding current utility discount program participants harmless. No one should lose access to existing affordability programs or inadvertently see their energy costs increase due to the Proposed Pilot Program. To that end, the automatic bill credit through the Proposed Pilot Program should be layered over and above any other affordability benefits or assistance.”¹³ They note that layering will also reduce administrative costs, since it will not require the Company to identify customers in a CBG who already receive assistance and exclude them from automatic bill credits. The Company agrees. We proposed several arguments for allowing layering.¹⁴ The pilot is designed to explore a new way to deliver assistance to more customers; it is not our intent that any customer already receiving assistance through LIHEAP or an Xcel Energy program should lose that assistance, or be asked to choose between it and participation in the pilot.

The Joint Commenters raise one issue that did not come up in ESAG discussions. We proposed that the intent of the pilot is to limit electricity burden to roughly four percent, but not to cause a customer’s bill to become negative – which theoretically could occur for customers who receive an Automatic Bill Credit on top of other discounts or bill credits. We have proposed that the Automatic Bill Credit would be limited to the amount that would result in a zero bill.¹⁵ The Joint Commenters note that some existing programs, such as PowerOn, require the participant to make regular, discounted payments to remain eligible, and are concerned that a zero bill could have the unintended effect of disqualifying them from their existing discount

¹¹ Northern States Power Company, doing business as Xcel Energy. REVISED RESILIENT MINNEAPOLIS PROJECT PROPOSAL. *Integrated Distribution Plan*. Docket No. E002/M-21-694. March 19, 2024.

¹² Joint Commenters at 4.

¹³ Joint Commenters at 5.

¹⁴ Petition at 14.

¹⁵ Petition at 14-15.

program.¹⁶

Again, the intent of the pilot is not to make any current energy assistance recipient lose assistance. We are working with Energy CENTS, our third-party PowerOn implementing partner, to explore potential solutions that could include excusing PowerOn recipients in the eligible CBGs from those regular payments, structuring the Automatic Bill Credit so that all recipients would be required to make a nominal, non-zero monthly payment, or another solution yet to be identified. Either option would require more complex billing and IT designs than were initially contemplated, so we are currently exploring those mechanics with the relevant departments and will confer further with Energy CENTS on a proposed solution.

E. Monitoring & evaluation

The Joint Commenters support the Company's proposal to engage a third-party evaluator to design a Monitoring & Evaluation (M&E) Plan, conduct a program evaluation, and help inform the decision whether the pilot should be continued, expanded, or modified. They find our proposed budget for evaluation to be reasonable.¹⁷ They recommend that the Company engage with ESAG members to develop evaluation metrics, including holding a stakeholder meeting with ESAG and the third-party evaluator during the evaluation design process and before data collection begins.¹⁸ Although the work of ESAG has formally concluded, we see no consulting with ESAG on the draft M&E Plan before data collection begins.

III. DEPARTMENT OF COMMERCE

The Department of Commerce appreciates the Company's and ESAG's efforts in developing the Automatic Bill Credit pilot program and supports approval of the program, with modifications and requests for further information.

A. Consistency with Order

On the question of whether the pilot meets the Commission's objectives for ESAG, the Department cites the Order language, "design for the equitable delivery of electricity services and programs for energy-burdened customers," and agrees that the pilot will lower energy burden for customers who experience barriers to enrolling in assistance programs.¹⁹ The Department notes that "it is not yet known whether Xcel

¹⁶ Joint Commenters at 5-6.

¹⁷ Joint Commenters at 7.

¹⁸ Joint Commenters at 8.

¹⁹ Department comments at 3, 6.

[Energy] has designed for the delivery of services.”²⁰ We are not entirely clear on the meaning of this, but from the sentences that follow – referring to the need for more time to determine whether delivery of services has been equitable – we think the Department means that equitable delivery can only be judged through implementation and evaluation of the pilot over time. We agree. In any case, the Department recommends the Commission find that the proposed pilot does meet the Commission’s objectives for ESAG.²¹

B. Holistic approach to energy burden

The Department notes that “ESAG has proposed other efforts related to workforce development, energy efficiency and renewable energy. Xcel [Energy] further has plans to form an Environmental Justice Board, which may be the vehicle to continue carrying out the efforts regarding the equitable delivery of services. Right now, it is too early to say. Consequently, the Department recommends the Commission require continued monitoring of Xcel [Energy]’s efforts to implement the recommendations from the Equity Stakeholder Group and in monitoring efforts from the Environmental Justice Board.”²² As noted in our Petition, the Automatic Bill Credit pilot is only one of several potential initiatives coming out of the ESAG process, some of which will be explored further with EJAB. Additional initiatives in energy efficiency, workforce development, and renewable energy will be filed in the relevant dockets if an initiative requires Commission and/or Department of Commerce approval.

C. Cost recovery

On the proposed cost recovery mechanism, the Department points out that because all Xcel Energy electricity customers pay the costs of nuclear spent fuel storage through base rates, and to date have received the Minnesota allocational share of Department of Energy (DOE) settlement payments via a general rate case or periodic refunds, “the costs of the pilot will be borne by Xcel [Energy]’s ratepayers one way or another.”²³ This is true; however, the Company believes there may be a customer perception difference between being asked to shoulder the cost of a new pilot via an increase to the Low-Income Energy Discount Rider, versus simply receiving a smaller annual refund of DOE settlement payments.

Even if the customer perception difference is viewed as immaterial, the reduction in

²⁰ Department comments at 6.

²¹ Department comments at 18.

²² Department comments at 6.

²³ Department comments at 9.

refund is quite small. As indicated in our response to Office of the Attorney General – Residential Utilities Division (the OAG) Information Request 2, the \$5.4 million estimated annual cost of automatic bill credits would translate into an estimated reduction of \$1.53 per year to the average residential customer’s DOE settlement refund. This cost would be slightly lower still after the Office of the Attorney General’s proposed “screens” are applied (see section IV).

In addition, we note that using DOE settlement payments to fund low-income assistance is not without precedent. As discussed in our response to the OAG’s Information Request 26, the Commission in 2021 approved using part of the residential class allocation of DOE payment #11 to fund the PowerOn program, which offers low-income households a discount on a portion of their monthly bills and partial forgiveness of past-due bill balances. In another docket, the Commission approved a \$2 million allocation to the PowerOn program from the initial DOE payment (DOE #1) which covered claims for 1998 to 2008.²⁴

The Department supports our proposal to fund the two-year pilot using a portion of the Minnesota-jurisdictional share of DOE settlement payments #15 and #16.²⁵

D. Energy burden threshold

The Department, while supporting the four percent electric energy burden threshold to determine eligible CBGs, requests the Company provide a table listing the number of eligible customers, average bill credit amount, total bill credit dollars, and poverty rates for electricity burdens at three, four and five percent. The OAG and Joint Commenters made similar requests. We have provided a table with the summary data at all the requested thresholds – see Table 1 in section IV.D.

E. Layering with other energy assistance

The Department does not consider layering of benefits to be a concern and agrees that receiving an automatic bill credit should not disqualify a customer from any other energy assistance program. The Department also believes it is reasonable to limit automatic bill credits to those that would result, in combination with any other energy assistance a customer receives, in a zero bill.²⁶ As noted above, the Company plans to work with Energy CENTS to ensure that a zero bill does not inadvertently cause any customers to lose access to existing energy assistance.

²⁴ Dockets E002/M-21-0069 and E002/M-11-807.

²⁵ Department comments at 9.

²⁶ Department comments at 13.

F. Over-inclusion

The Department “generally agrees with the concerns raised by ESAG but emphasizes that both over-inclusion and under-inclusion will likely occur. In addition, the Department agrees that for the purposes of an initial pilot, the degree of over-inclusion is likely small, and advantages of allowing a small amount of over-inclusion outweigh the disadvantages of having to identify, enroll, and verify income by household. Finally, the Department agrees that an opt-out option and the future introduction of more targeted, household-specific income checks could mitigate this issue going forward.”²⁷ We appreciate the Department’s support on this point.

G. Monitoring & evaluation

The Department suggests that at least some desired outcomes should be predetermined, before the pilot, to avoid confirmation bias; but acknowledges that not all metrics must necessarily be determined, since it is important to report unexpected outcomes as well. The Department recommends reporting on the following general outcomes:

- Energy credit dollars – i.e., the difference that the credit makes, measured by the impact on the customer’s electricity payments.
- Associated benefits from the credit, such as reduced chances that a customer will not pay their bill. Lower bills and resultantly more dollars in the pockets of residents means more ability for residents to pay for expenses, such as in fully paying monthly electricity bills.
- Participation in and impacts on other energy assistance programs – the bill credit may impact other energy assistance benefits. For example, some customers may substitute the automatic bill credit for the work needed to apply for the low-usage credit, or the weatherization program. Tracking such benefits may help better understand the effects of the program.²⁸

The Department suggests a list of specific pilot evaluation metrics on which they recommend the Company report two years of historical data, report on the same metrics semi-annually during the pilot, and provide annual estimates:

- Average bill credit amount
- Total bill credit dollars

²⁷ Department comments at 15.

²⁸ Department comments at 16-17.

- Missing payments
- Disconnections
- Arrearages
- Participation rates and amount of assistance for other energy assistance programs
- Participant billing impacts (e.g., percentage reduction in customer's bill.)
- Number or percentage of customers who opt out of the credit.²⁹

The Company agrees with this list of metrics, which also includes several of the metrics suggested by the Office of the Attorney General – Residential Utilities Division (the OAG), as discussed further in section IV part E below. The Company also agrees in principle with the suggestion to compile two years of baseline historic data, where available. As stated in the Petition, we recommend not requiring the Company to finalize the M&E Plan or evaluation metrics before pilot approval. We believe the third-party evaluator (selected via competitive RFP, after approval) will have considerable expertise to offer in M&E and may be able to suggest additional or alternate metrics that could be more effective than those the Company or stakeholders have yet considered. In addition, this would allow the Company and third-party evaluator to consider data limitations – for example, some of the data above may be available at the system level but not by CBG – and how best to fill data gaps. As a result, we request that the Commission give the evaluator flexibility to examine each of these metrics and the underlying data and either track the metric throughout the pilot, or provide evidence in the M&E Plan or a subsequent semi-annual report if a metric is unsuitable for measuring the effectiveness and/or outcomes of the pilot.

IV. OFFICE OF THE ATTORNEY GENERAL – RESIDENTIAL UTILITIES DIVISION

The OAG recommends the Commission approve the Automatic Bill Credit pilot with modifications, which the Company agrees are reasonable and will strengthen the pilot. The OAG appreciates the dedication of ESAG participants who do not routinely take part in Commission proceedings, but devoted significant time to the design of this pilot including providing perspective on the lived experience of the communities they serve.³⁰ We agree with the OAG that this proposal would not have been possible without ESAG's guidance and perspective.

²⁹ Department comments at 19.

³⁰ The OAG comments at 1, 8-9.

A. Consistency with Order

In the OAG’s view the pilot meets the objective of the Order, “design for the equitable delivery of electricity services and programs for energy-burdened customers,” because “it is a novel design for the delivery of affordable electricity, to be accomplished by reducing energy burden, and because the pilot was developed by members and leaders of BIPOC and low-income community organizations in cooperation with Xcel [Energy], which will hopefully strengthen future communication with and encourage further participation from these individuals and organizations.”³¹

The OAG provides a summary from its perspective of the barriers some families face in applying for energy assistance programs: assembling income documentation, which can be challenging with multiple jobs, temporary or seasonal jobs, and gig employment; providing a Social Security or other identification number, which for some raises fears of endangering their immigration status; assuming they will not qualify or will have to pay back assistance received; feel there is a stigma attached to accepting assistance; or do apply for assistance, but do not receive it when the first-come, first-served LIHEAP funding runs out. The OAG’s list of barriers echoes Fresh Energy’s and the barriers the Company heard from ESAG. As a result of these barriers and funding shortfalls, the OAG estimates that only 19 percent of LIHEAP-eligible households received assistance in 2021.³² The OAG feels the proposed pilot can avoid these barriers and improve economic health for pilot participants while also providing systemwide benefits from reduced disconnections and arrearages.

B. Consistency with Minnesota statutes

The OAG agrees that the proposed pilot is consistent with Minnesota statutes on just and reasonable, equitable, and not unreasonably preferential electricity rates and service. Citing both *Minn. Stat. § 216B.03*, which the Company addressed in our Petition, and *Minn. Stat. § 216B.07*, which states that “No public utility shall, as to rates or service, make or grant any unreasonable preference or advantage to any person or subject any person to any unreasonable prejudice or disadvantage,”³³ the OAG states its view that the Automatic Bill Credit pilot will meet these statutory requirements for just and reasonable, equitable, and not unreasonably preferential rates and service – provided the Company makes modifications to reduce certain

³¹ The OAG comments at 2.

³² The OAG comments at 4-7. Fresh Energy in its comments provides a source that updates this figure to 23 percent for 2023 – a small improvement, but still leaving close to 80 percent of LIHEAP-eligible households estimated to receive no LIHEAP assistance.

³³ [Sec. 216B.07 MN Statutes](#).

types of over-inclusion that the OAG has identified.³⁴ We discuss those modifications below. The OAG also opines that the pilot “will be just and reasonable because it will reduce energy burden for many Minnesota households without imposing additional administrative and social hurdles, and because it can produce meaningful data on how reduction of late payment fees, arrearages, and disconnections can benefit directly affected recipients of bill credits and Xcel [Energy]’s electric system as a whole.”³⁵

C. Proposed data “screens”

The OAG believes the Company can reduce over-inclusion by applying three “screens” to exclude certain CBGs and premises that were included in our initial analysis, but appear should not qualify for bill credits.³⁶ These screens are the result of the OAG filing Information Requests for confidential customer- and premise-specific data and identifying in that data certain premises that do not appear to be residential. We appreciate the OAG’s scrutiny of the data and acknowledge our preliminary analysis included some premises that, while labeled residential, are linked to a customer account name and/or address that is not residential.

The Company has communicated with the OAG about these screens and finds them reasonable. We noted in our Petition that our initial analysis was necessary to scope out ESAG’s proposed concept and estimate costs, but was not intended as a final analysis serving as the basis for bill credits. The Company intends to re-run the analysis prior to launching the pilot, using the latest available electric bill data and latest U.S. Census data on median incomes.³⁷ In so doing, we propose to apply the OAG’s three screens, as well as additional filters, to eliminate any non-qualifying premises. We address each in turn.

1. Exclude CBGs with fewer than 15 qualifying premises.

The initial analysis included 15 such CBGs with 35 premises in total. These are CBGs in which the Company serves a very small number of customers, with the remainder of customers in the CBG served by one or more other utilities. As the OAG suggests, it is possible these CBGs met the greater than or equal to four percent electric energy burden only because of having so few premises served by Xcel Energy, which increases the risk of data anomalies. It is also possible that excluding these CBGs could exclude a small number of premises that should in fact receive bill credits. However, we agree with the OAG that this risk is small and is outweighed by the

³⁴ The OAG comments at 5-6.

³⁵ The OAG comments at 9.

³⁶ The OAG comments at 11.

³⁷ Petition at 12.

benefit of avoiding unintended non-residential recipients and ensuring the results of the pilot evaluation are reliable.³⁸

2. *Within qualifying CBGs, exclude premises where the associated customer name includes keywords suggesting that a company or government entity pays the electric bill.*

The OAG identified some premises where the associated customer name does not appear to be an individual or natural person. To exclude such customers from receiving bill credits, the OAG proposes that the Company search for and exclude customer names that include a set of keywords specified in Attachment 6 of its Comments.³⁹ The Company agrees, and will screen for and exclude these customers.

3. *Within qualifying CBGs, exclude premises where the customer billing address is outside Minnesota.*

The OAG identified some premises where the associated customer name is linked to a billing address outside Minnesota, some of whom also appear to be business or government entities. Excluding these customers would prevent, for example, an out-of-state landlord who has purchased a residential premise in a qualifying CBG from receiving bill credits that the Company could not guarantee would be passed on to tenants of the premise. It could also screen out premises that are vacation homes owned by out-of-state residents.⁴⁰

4. *Search the data for premises where the premise address and the (in-state) billing address are not the same.*

There could be legitimate reasons why this might occur, and the premise should still receive automatic bill credits, for example if a person pays the bill on behalf of an elderly parent living in an eligible premise. But flagging address mismatches could help catch some commercial owners that the OAG's screen #2 does not catch.

5. *Flag for extra scrutiny any account holder names that appear multiple times in the data.*

When we experimentally applied this screen, we found some account holders who would have been eliminated by the OAG's screen #2, but some that would not since they did not include any of the keywords the OAG suggests.

³⁸ The OAG comments at 15-18.

³⁹ The OAG comments at 18-21 and Attachment 6 at page 45 of the public version of the OAG's comments.

⁴⁰ The OAG comments at 21.

The Company and the OAG have discussed that screens designed to exclude commercial account holders and out-of-state addresses have the potential to exclude one category of residential customers – tenants of a multi-unit residential building where electricity use is submetered, paid by the landlord and included in rent – who would receive bill credits if their electricity use were individually metered.⁴¹ The Company does not believe this would affect a large number of customers, but we do not have information on how common this sort of submetering is; we have visibility for the meters we serve, but not the number and type of units behind those meters. If the Company provided bill credits to the landlord that are intended for tenants, we would have no ability to ensure the landlord passes those savings on to the tenants as a reduction in rent. A theoretical solution could exist in legislation enacted in 2024 that governs shared-meter residential buildings, makes those landlords subject to Commission authority, and requires landlords to “deduct from a tenant's total bill the tenant’s pro rata share of any bill credits or adjustments received by the landlord on the bill from the utility provider by dividing the credit or adjustment equally among the number of units in the building.”⁴² However, this authority is new, and the only enforcement mechanism is tenant complaints, which would require tenants first to know they are entitled to an automatic bill credit, and second to have the time to organize together and file a complaint with the Commission – which seems unlikely considering the population the pilot intends to serve. Considering the difficulty of ensuring tenants of a submetered multi-unit building would receive automatic bill credits, we and the OAG have agreed that it is preferable to exclude landlords such buildings at least for the initial two-year pilot.⁴³ The Company can continue to explore in the M&E Plan how common this scenario may be, and consider a mechanism for landlords of a submetered multi-unit building to opt in to receiving bill credits if they commit to passing them on to tenants. This could inform including such buildings if the pilot should transition to a permanent offering in the future.

D. Energy burden threshold

The OAG filed Information Requests asking the Company to evaluate various alternatives to the four percent electric energy burden threshold. The OAG asked us to evaluate number of eligible CBGs, number of eligible premises, and total cost at thresholds of six percent and eight percent electric energy burden, and in a

⁴¹ The OAG comments at 15.

⁴² [S4579-4 \(mn.gov\)](#) at 4.27 to 4.29.

⁴³ The OAG comments at 25-26. The OAG concludes that “The benefits to ratepayers of reducing the costs of the pilot by preventing bill credits from flowing to non-residential premises or to landlords who may not pass on the bill credits to their tenants outweigh the potential under-inclusion of sub-metered tenants with non-compliant landlords.”

subsequent Information Request also requested three percent. The Department of Commerce and Joint Commenters also asked for evaluation of three, four and five percent thresholds. Results at all these thresholds are shown below.

Table 1. Key metrics for the Automatic Bill Credit pilot at different thresholds for electric energy burden.

Electric energy burden threshold	Number of CBGs eligible	Number of premises eligible	Estimated annual cost of bill credits	Annual residential bill impact for non-participants
4% (as proposed)	77	22,949	\$5.4 million	\$1.53
3%	190	67,945	\$19.7 million	n/a *
5%	39	8,183	\$1.7 million	n/a *
6%	16	2,638	\$476,000	\$0.13
8%	5	701	\$105,800	\$0.03

* The Company has not estimated non-participant bill impact of a pilot at these thresholds.

The OAG concludes that the four percent threshold is reasonable. They note that this will reduce energy burden below the threshold considered “High” (six percent) by the DOE, which is appropriate because the pilot addresses only electric energy burden, not accounting for additional costs for natural gas or other heating fuel that are part of customers’ overall energy burden.⁴⁴ In other words, reducing electric energy burden to six percent would leave overall energy burden above the “High” threshold. Raising the eligibility threshold to six percent or eight percent would also significantly reduce the scope of the pilot – to 16 CBGs and 2,638 premises at a six percent electric energy burden threshold, and to five CBGs and 701 premises at an eight percent threshold – which would not only provide assistance to fewer households, but would also yield a significantly smaller data set for a pilot that intends to evaluate the impact of a new approach on metrics such as late payments, arrearages, and disconnections, and any corresponding benefit to the Company’s customer base as a whole.⁴⁵

E. Monitoring & evaluation

The OAG supports the Company’s proposal to engage a third-party evaluator through a competitive request for proposals, without taking a position on the reasonableness of the Company’s estimated costs for this evaluator. The OAG recommends the Commission authorize the Company to issue an RFP for a third-party evaluator.⁴⁶

⁴⁴ The OAG comments at 27-28.

⁴⁵ The OAG comments at 28-30.

⁴⁶ The OAG comments at 30, 35.

The OAG expresses misgivings that the M&E approach may be overly survey-based, and that this could impose a burden on already overstrained populations and/or leave out information from impacted customers who lack the time or ability to participate in surveys.⁴⁷ This seems a reasonable caution. We included mention of customer surveys in our Petition because we believe some information on customers' experience of the pilot may be qualitative and best collected through surveys. However, we intend to work with the third-party evaluator to design an M&E Plan that captures meaningful data on key pilot metrics without imposing an unreasonable burden on participants. Much of the data on metrics of pilot success – disconnections, arrearages, payment plan participation, number of customers opting out, etc. – can be compiled from Company data without requesting information from participants. In addition, an experienced M&E team will identify other means of collecting data from customers, such as focus groups, participation in community events, etc. to reduce the burden of primary data collection. The suitability of different tactics will depend on the outcomes the M&E team decides to measure and, as such, we hope that the Commission will agree with the recommendation that selection of an evaluator is the logical next step in defining an M&E Plan.

The OAG goes on to suggest a list of metrics that they believe the Company should report on quarterly, some of which are also included in the Department's recommended metrics discussed in section III part G above. The OAG suggests these metrics should be reported before the credit is applied and for each month thereafter:

- The number of premises in each participating CGB involuntarily disconnected;
- The number of premises in each participating CGB who sought protection under the cold weather rule;
- The number of premises in each participating CGB who were granted protection under the cold weather rule;
- The number of payment plan requests received in each participating CGB;
- The number of new mutually agreed payment plans in each participating CGB;
- The number of premises with current payment plans in each participating CGB;
- The number of past due accounts in each participating CGB;
- The average monthly past due amount for past due accounts in each participating CGB;
- The total dollars past due for residential customers in each participating CGB;

⁴⁷ The OAG comments at 31.

- Number and amount of write-offs from uncollectible accounts in each participating CBG;
- The number and amount of late fees charged to customers;
- The number of premises electing to opt-out of receiving a bill credit, including the CGB in which the opt-out customers are located.⁴⁸

The OAG maintains that much of this information is collected and filed monthly in the annual service quality dockets. This is true for some bullets above; however, with the exception of disconnections reported on the Company's interactive Service Quality map, these data are not currently collected or reported at the CBG level. Compiling this information by CBG every month, and reporting it every quarter, would add significantly to the administrative cost of the pilot. The Department's M&E recommendation – reporting semi-annually on a more focused list of metrics⁴⁹ – we believe strikes a better balance between containing administrative cost but still collecting sufficient data to evaluate the success of the pilot. We urge the Commission to consider the Department's list, but as requested above, leave the Company flexibility to discuss metrics and finalize the M&E Plan with the third-party evaluator and in consultation with relevant stakeholders.

V. COMMUNITY ACTION PARTNERSHIP OF RAMSEY & WASHINGTON COUNTIES

Mr. Roger Colton, Principal of Fisher Sheehan & Colton Public Finance & General Economics, filed comments on behalf of Community Action Partnership of Ramsey & Washington Counties (CAPRW), an ESAG member organization. Overall, Mr. Colton commends the proposal and recommends adoption with minor modifications. He mentions many of the same barriers to accessing existing LIHEAP and utility energy assistance that are highlighted in the Petition and mentioned in the comments from Fresh Energy, the Department, and the OAG, and commends the Company and ESAG for proposing a new approach to overcoming these barriers.⁵⁰

A. Energy burden threshold

Mr. Colton supports the choice of a four percent electric energy burden threshold for CBG eligibility. He notes that six percent is a commonly accepted burden for total household energy – the same as the “High” overall energy burden threshold cited by

⁴⁸ The OAG comments at 32-33.

⁴⁹ Department comments at 19.

⁵⁰ Colton comments at 1-2.

the OAG – which includes both electricity and heating fuel costs, and that because household electricity bills tend to be somewhat higher than natural gas bills, it is reasonable to set the electric energy burden threshold at four percent.⁵¹

B. Use of median income in determining eligibility

Mr. Colton discusses using median household income in the energy burden formula to determine CBG eligibility. He compares this metric to two others: the percentage of population in a CBG with income at or below 200% of the Federal Poverty Level, and the percentage of households in a CBG with income below \$35,000. Looking at Minnesota as a whole (not the Company's service territory), he finds only partial overlap between the 150 CBGs with the lowest median household income and the 150 with the highest percentage on each of the other two metrics.⁵²

The Company discussed in our Petition why we chose energy burden, rather than income or poverty, as the metric for eligibility. We did so in consultation with ESAG, which agreed energy burden would allow a more precise targeting of assistance.⁵³ Since energy burden is equal to household energy cost divided by household income, it requires some metric of household income for its denominator. In addition, some income metric was needed to calculate the size of bill credits for each CBG. We chose Census data on median household income as the best available option.

Mr. Colton does not recommend moving away from median household income for the design of the two-year pilot. He instead recommends the Company “devote particular attention to the impacts of its ABC Pilot in those Census Block Groups with high percentages of low-income households.”⁵⁴ The Company will keep this issue in mind when working with our third-party evaluator to develop the M&E Plan. We may, for example, be able to identify within the overall population of CBGs receiving bill credits those CBGs that have the highest percentage of population with incomes at or below 200% of the Federal Poverty Level and/or the highest percentage of households with income below \$35,000, for additional analysis on the impacts of automatic bill credits in these CBGs. There may also be other indicators of suitability that emerge, as well as possible ways to balance between household income level and collective eligibility. Once the pilot evaluation is underway, we could explore further with stakeholders, including EJOB, whether another eligibility metric is preferable to energy burden based on median income, should the pilot transition in the future into a more permanent offering.

⁵¹ Colton comments at 3.

⁵² Colton comments at 2-3.

⁵³ Petition at 9.

⁵⁴ Colton comments at 3.

C. Over-inclusion

Mr. Colton believes that some degree of over-inclusion and under-inclusion is inherent in a pilot designed to operate geographically without collecting household-specific income data. Indeed, he says over-inclusion and under-inclusion are difficult to avoid even in more targeted programs, such as tiered discounts and Percentage of Income programs, that do require household-level data. He recommends the Commission approve the pilot with some degree of over-inclusion explicitly acknowledged, and that part of the M&E Plan should be to estimate how much is occurring and whether this is reasonable or not.⁵⁵ The Company agrees and suggested the same in the Petition. Working with the third-party evaluator, we hope to devise a method to collect data on incomes of a subset of the recipient households, to estimate what portion of the overall benefits of the pilot are going to households who would also qualify for energy assistance programs with a household income threshold.⁵⁶

D. Missed payments

Mr. Colton supports the Company's proposal that a customer who misses payments would continue receiving automatic bill credits unless they are disconnected or move out of an eligible CBG. We proposed that in a pilot testing a new approach, allowing non-paying households to continue to receive monthly bill credits would provide an opportunity to evaluate whether doing so might positively influence payment behavior or reduce disconnections.⁵⁷ Mr. Colton agrees with this rationale, emphasizing that an important question being tested is the extent to which automatic bill credits make electric bills more sustainably payable by the participating customers. Discontinuing bill credits if a payment is missed would not allow this to be tested. For the same reason, he recommends customers who are disconnected for non-payment should have the automatic bill credit reinstated when they are reconnected.⁵⁸

Mr. Colton presents evidence that low-income households often have “fragile” income – i.e., are more vulnerable to disruptions in income due to life events, and less likely than higher-wage workers to have benefits such as paid sick leave or flexible work arrangements that allow them to continue working through such disruptions. These disruptions often threaten low-income households' ability to pay energy bills. Therefore, “allowing ABC Pilot participants to continue in the program should they miss payments recognizes the ongoing economic challenges which they face. To the

⁵⁵ Colton comments at 4.

⁵⁶ Petition at 20.

⁵⁷ Petition at 13.

⁵⁸ Colton comments at 4-5.

extent that program participants miss sufficient payments to merit the disconnection of service for nonpayment, they should also face the same consequences that any other residential customer would face.”⁵⁹

E. Layering with other energy assistance

Mr. Colton supports the Company’s proposal to allow layering of the automatic bill credits with other assistance. To the other commenters’ policy arguments for allowing layering, Mr. Colton adds a legal rationale that allowing layering is consistent with the federal LIHEAP statute, which does not allow LIHEAP assistance to be considered household income for the purposes of determining eligibility for, or reducing the amount of, other energy assistance.⁶⁰

Mr. Colton then addresses the Company’s proposal that automatic bill credits should not cause a customer’s electric bill to go below zero on a monthly basis. Mr. Colton believes a negative bill balance could indeed happen, particularly during or following the months when a customer receives LIHEAP benefits, and/or in lower-cost months. Mr. Colton believes a negative bill balance on a monthly basis should be allowed. He proposes a modification in which, as we understand it, the Company would allow monthly bills to go negative, but would not issue bill refunds; rather, “at the end of each 12 months of participation, Xcel [Energy] should be allowed to true-up the credits it has provided. If the application of the ABC Pilot credits has resulted in a credit on a participant’s bill at the end of the 12-month period, the credit can and should be applied to adjust the bill for the coming year.”⁶¹

We see some challenges with this suggestion. First, allowing negative monthly bills with an annual true-up would add administrative complexity to the pilot. Second, it could have unintended consequences, for example if the annual true-up put a customer in a balance-due position. Third, it appears to be in conflict with the Joint Commenters’ recommendation that the Automatic Bill Credit pilot should require all recipients to make a nominal, non-zero monthly payment in order not to lose access to other assistance, such as PowerOn, that requires minimum monthly payments.⁶² Before introducing this added complexity, the Company proposes to gain a better understanding through the M&E Plan how many customers might be affected, to inform whether a design change is warranted should the pilot transition into a permanent offering.

⁵⁹ Colton comments at 4-7.

⁶⁰ Colton comments at 7-8.

⁶¹ Colton comments at 8-9.

⁶² Joint Commenters at 5-6.

F. Monitoring & evaluation

Mr. Colton supports the Company’s proposal to engage a third-party evaluator, but objects to the Petition not presenting an evaluation plan. He recommends the Commission “require the Company to continue to engage in its collaborative [presumably referring to ESAG] to: (1) articulate the specific outcomes it hopes to achieve through the Pilot; and (2) the specific metrics it proposes to track by which to measure those outcomes. Specifying the data collection which the Company intends to pursue, in other words, is not a task to be delayed until ‘later.’ Specifying the outcomes, along with the data by which those outcomes will be measured, should be an element of program design that is articulated at the very beginning and agreed to by the Company, the Commission, and the relevant stakeholders.”⁶³

If “at the very beginning” means at the launch of the pilot and prior to data collection, the Company can agree. If it means prior to the Commission’s decision on the pilot, we do not agree. The latter would mean creating the pilot M&E Plan before the third-party evaluator is hired – thus foregoing any expertise the third-party evaluator will have to suggest M&E approaches, data collection, outcomes and metrics for a first-of-its-kind pilot. The Company suggested in our Petition some preliminary outcomes and metrics that we believe the M&E Plan can and should include.⁶⁴ We would like the opportunity to benefit from the third-party evaluator’s expertise in further fleshing out those preliminary ideas.

As for Mr. Colton’s suggestion to continue to engage ESAG, we agree. While the work of ESAG has formally concluded, the Company can convene an ESAG meeting or otherwise solicit ESAG feedback once the third-party evaluator has been hired and a draft M&E Plan developed, requesting input on the proposed approach, outcomes and metrics. This suggestion was made also by the Joint Commenters,⁶⁵ and the Company finds it reasonable.

VI. PUBLIC COMMENT

One commenter, James Siegel, opposes Commission approval of the pilot, citing a Center of the American Experiment article. Mr. Siegel alleges the proposed pilot is “biased” and “discriminatory,” and objects to all Xcel Energy customers being asked to help pay the bills of low-income customers.⁶⁶

⁶³ Colton comments at 10.

⁶⁴ Petition at 20.

⁶⁵ Joint Commenters at 8.

⁶⁶ James Siegel public comment, May 24, 2024.

Mr. Siegel's contentions are generally incorrect or misleading. First, all customers paying a surcharge to fund low-income energy assistance is already the case for several programs, not a new proposal in this pilot. Second, Mr. Siegel maintains that "all someone would need to do is move into that designated low-income ZIP Code" to "have everyone else pay part of my bill."⁶⁷ This is also the central premise of the Center of the American Experiment article.⁶⁸ Leaving aside the technicality that no ZIP code data was used, the Company is skeptical that our customers would choose to relocate in order to receive a bill credit averaging \$458 per year. Home relocation decisions are significant, expensive, and often stressful for any family. A variety of studies have surveyed why people move. We did a cursory search of articles on this topic and found commonly cited reasons include a job transfer or career change or shortening a commute; moving to be closer to family; marriage, divorce, retirement, or other life changes; wanting more (or less) space; wanting to own rather than rent; neighborhood characteristics, school districts, property taxes, climate change, and other considerations. Moving to secure energy assistance did not appear on any list we found, even those that ranked up to 20 top reasons for relocation.⁶⁹

Third, inherent in promoting equity is the need to address biases and discrimination that have led to concentrated poverty in certain areas of Minnesota. The CBGs identified for automatic bill credits have higher than average energy burden not by accident or coincidence, but because of decades of well-documented practices affecting where people live, whether they own a home, educational attainment, job prospects, how much income they earn, and many other disparities. As discussed in our Petition, the Company did not cause those disparities, but can play a role in reducing them. We propose a pilot program that, if it is considered preferential, is reasonably so and moves us in an anti-discriminatory direction.⁷⁰ All commenters other than Mr. Siegel appear to agree this preference is justified, and complies with Minnesota statutes on just, reasonable, and equitable electric rates and service.

CONCLUSION

The Company appreciates the support from 27 ESAG members, the Department of Commerce, Office of the Attorney General - Residential Utilities Division, Fresh Energy and its co-signers, the Center for Energy and Environment and Energy CENTS Coalition, and Mr. Roger Colton on behalf of Community Action

⁶⁷ Ibid.

⁶⁸ [Want lower electricity prices? Move to a poor neighborhood. \(americanexperiment.org\)](http://www.americanexperiment.org).

⁶⁹ See [Why People Move \(census.gov\)](http://www.census.gov), [Why Do People Move House? Top 20 Reasons Why People Relocate \(themovingblog.com\)](http://www.themovingblog.com), [Why America Is Moving: Money, Space, Family, Lifestyle ... : NPR](http://www.npr.org), and [Why Do People Move? Here Are the Top Reasons for Relocation - Livability.com](http://www.livability.com).

⁷⁰ Petition at 24.

Partnership of Ramsey & Washington Counties, for approval of our Automatic Bill Credit Pilot Petition. We again express our gratitude to ESAG members for working with the Company to develop this innovative approach to reducing energy burden for low-income customers. Should the Commission approve the pilot, we look forward to re-running our analysis with the OAG's recommended data screens, setting up the billing system mechanics to deliver bill credits, and selecting a third-party evaluator with whom we will develop a robust M&E Plan to evaluate the effectiveness of the pilot. Finally, we look forward to applying what we have learned from ESAG about participatory program development to other relevant programs and dockets.

Dated: July 23, 2024

Northern States Power Company

CERTIFICATE OF SERVICE

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

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

xx electronic filing

DOCKET NOS. E002/M-24-173
E002/M-22-266
E002/RP-19-368

Dated this 23rd day of July 2024

/s/

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Jenny	Glumack	jenny@mrea.org	Minnesota Rural Electric Association	11640 73rd Ave N Maple Grove, MN 55369	Electronic Service	No	OFF_SL_24-173_M-24-173

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Todd J.	Guerrero	todd.guerrero@kutakrock.com	Kutak Rock LLP	Suite 1750 220 South Sixth Street Minneapolis, MN 554021425	Electronic Service	No	OFF_SL_24-173_M-24-173
Shubha	Harris	Shubha.M.Harris@xcelenergy.com	Xcel Energy	414 Nicollet Mall, 401 - FL 8 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_24-173_M-24-173
Kim	Havey	kim.havey@minneapolismn.gov	City of Minneapolis	350 South 5th Street, Suite 315M Minneapolis, MN 55415	Electronic Service	No	OFF_SL_24-173_M-24-173
Philip	Hayet	phayet@jkenn.com	J. Kennedy and Associates, Inc.	570 Colonial Park Drive Suite 305 Roswell, GA 30075-3770	Electronic Service	No	OFF_SL_24-173_M-24-173
Todd	Headlee	theadlee@dvigridsolutions.com	Dominion Voltage, Inc.	701 E. Cary Street Richmond, VA 23219	Electronic Service	No	OFF_SL_24-173_M-24-173
Adam	Heinen	aheinen@dakotaelectric.com	Dakota Electric Association	4300 220th St W Farmington, MN 55024	Electronic Service	No	OFF_SL_24-173_M-24-173
Jared	Hendricks	jared.hendricks@owatonnautilities.com	Owatonna Municipal Public Utilities	PO Box 800 208 S Walnut Ave Owatonna, MN 55060-2940	Electronic Service	No	OFF_SL_24-173_M-24-173
Annete	Henkel	mui@mutilityinvestors.org	Minnesota Utility Investors	413 Wacouta Street #230 St. Paul, MN 55101	Electronic Service	No	OFF_SL_24-173_M-24-173
Sandra	Henry	Sandra.Henry@elevatenp.org	Elevate	322 S Green St Ste 300 Chicago, IL 60607	Electronic Service	No	OFF_SL_24-173_M-24-173

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Kristin	Henry	kristin.henry@sierraclub.org	Sierra Club	2101 Webster St Ste 1300 Oakland, CA 94612	Electronic Service	No	OFF_SL_24-173_M-24-173
Corey	Hintz	chintz@dakotaelectric.com	Dakota Electric Association	4300 220th Street Farmington, MN 550249583	Electronic Service	No	OFF_SL_24-173_M-24-173
Joe	Hoffman	ja.hoffman@smmpa.org	SMMPA	500 First Ave SW Rochester, MN 55902-3303	Electronic Service	No	OFF_SL_24-173_M-24-173
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_24-173_M-24-173
MJ	Horner	mj.horner@xcelenergy.com		N/A	Electronic Service	No	OFF_SL_24-173_M-24-173
Lori	Hoyum	lhoyum@mnpower.com	Minnesota Power	30 West Superior Street Duluth, MN 55802	Electronic Service	No	OFF_SL_24-173_M-24-173
Jan	Hubbard	jan.hubbard@comcast.net		7730 Mississippi Lane Brooklyn Park, MN 55444	Electronic Service	No	OFF_SL_24-173_M-24-173
Travis	Jacobson	travis.jacobson@mdu.com	Great Plains Natural Gas Company	400 N 4th St Bismarck, ND 58501	Electronic Service	No	OFF_SL_24-173_M-24-173
Ralph	Jacobson	ralphj@ips-solar.com		2126 Roblyn Avenue Saint Paul, MN 55104	Electronic Service	No	OFF_SL_24-173_M-24-173
Casey	Jacobson	cjacobson@bepc.com	Basin Electric Power Cooperative	1717 East Interstate Avenue Bismarck, ND 58501	Electronic Service	No	OFF_SL_24-173_M-24-173

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Alan	Jenkins	aj@jenkinsatlaw.com	Jenkins at Law	2950 Yellowtail Ave. Marathon, FL 33050	Electronic Service	No	OFF_SL_24-173_M-24-173
Andrea	Jenkins	Andrea.Jenkins@minneapolismn.gov	Minneapolis City of Lakes	350 S 5th St Room 307 Minneapolis, MN 55415	Electronic Service	No	OFF_SL_24-173_M-24-173
Richard	Johnson	Rick.Johnson@lawmoss.com	Moss & Barnett	150 S. 5th Street Suite 1200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_24-173_M-24-173
Sarah	Johnson Phillips	sarah.phillips@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_24-173_M-24-173
Nate	Jones	njones@hcpd.com	Heartland Consumers Power	PO Box 248 Madison, SD 57042	Electronic Service	No	OFF_SL_24-173_M-24-173
Michael	Kampmeyer	mkampmeyer@a-e-group.com	AEG Group, LLC	260 Salem Church Road Sunfish Lake, MN 55118	Electronic Service	No	OFF_SL_24-173_M-24-173
Nick	Kaneski	nick.kaneski@enbridge.com	Enbridge Energy Company, Inc.	11 East Superior St Ste 125 Duluth, MN 55802	Electronic Service	No	OFF_SL_24-173_M-24-173
Stacey	Karels	skarels@local563.org	Mankato Area Bldg & Construction Trades Council	310 McKinzie St Mankato, MN 56001	Electronic Service	No	OFF_SL_24-173_M-24-173
William D	Kenworthy	will@votesolar.org	Vote Solar	332 S Michigan Ave FL 9 Chicago, IL 60604	Electronic Service	No	OFF_SL_24-173_M-24-173

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Samuel B.	Ketchum	sketchum@kennedy-graven.com	Kennedy & Graven, Chartered	150 S 5th St Ste 700 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_24-173_M-24-173
Brad	Klein	bklein@elpc.org	Environmental Law & Policy Center	35 E. Wacker Drive, Suite 1600 Suite 1600 Chicago, IL 60601	Electronic Service	No	OFF_SL_24-173_M-24-173
Frank	Kohlasch	frank.kohlasch@state.mn.us	MN Pollution Control Agency	520 Lafayette Rd N. St. Paul, MN 55155	Electronic Service	No	OFF_SL_24-173_M-24-173
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Brian	Krambeer	bkrambeer@mienergy.coop	MiEnergy Cooperative	PO Box 626 31110 Cooperative Way Rushford, MN 55971	Electronic Service	No	OFF_SL_24-173_M-24-173
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Michael	Krikava	mkrikava@taftlaw.com	Taft Stettinius & Hollister LLP	2200 IDS Center 80 S 8th St Minneapolis, MN 55402	Electronic Service	No	OFF_SL_24-173_M-24-173
Kay	Kuhlmann	Teri.Swanson@ci.red-wing.mn.us	City Of Red Wing	315 West Fourth Street Red Wing, MN 55066	Electronic Service	No	OFF_SL_24-173_M-24-173
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_24-173_M-24-173
Brenda	Kyle	bkyle@stpaulchamber.com	St. Paul Area Chamber of Commerce	401 N Robert Street Suite 150 St Paul, MN 55101	Electronic Service	No	OFF_SL_24-173_M-24-173

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Mary	LaGarde	mlagarde@maicnet.org	Minneapolis American Indian Center	1530 E Franklin Ave Minneapolis, MN 55404	Electronic Service	No	OFF_SL_24-173_M-24-173
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Rachel	Leonard	rachel.leonard@ci.monticello.mn.us	City of Monticello	505 Walnut St Ste 1 Monticello, MN 55362	Electronic Service	No	OFF_SL_24-173_M-24-173
Annie	Levenson Falk	annief@cupminnesota.org	Citizens Utility Board of Minnesota	332 Minnesota Street, Suite W1360 St. Paul, MN 55101	Electronic Service	No	OFF_SL_24-173_M-24-173
Jason	Loos	jason.loos@centerpointenergy.com	CenterPoint Energy Resources Corp.	505 Nicollet Mall 3rd Floor Minneapolis, MN 55402	Electronic Service	No	OFF_SL_24-173_M-24-173

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Susan	Ludwig	sludwig@mnpower.com	Minnesota Power	30 West Superior Street Duluth, MN 55802	Electronic Service	No	OFF_SL_24-173_M-24-173
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Kavita	Maini	kmairi@wi.rr.com	KM Energy Consulting, LLC	961 N Lost Woods Rd Oconomowoc, WI 53066	Electronic Service	No	OFF_SL_24-173_M-24-173
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Gregg	Mast	gmast@cleanenergyeconomy.org	Clean Energy Economy Minnesota	4808 10th Avenue S Minneapolis, MN 55417	Electronic Service	No	OFF_SL_24-173_M-24-173
Daryl	Maxwell	dmaxwell@hydro.mb.ca	Manitoba Hydro	360 Portage Ave FL 16 PO Box 815, Station Main Winnipeg, MB R3C 2P4 CANADA	Electronic Service	No	OFF_SL_24-173_M-24-173
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Thomas	Melone	Thomas.Melone@AllcoUS.com	Minnesota Go Solar LLC	222 South 9th Street Suite 1600 Minneapolis, MN 55120	Electronic Service	No	OFF_SL_24-173_M-24-173

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Peder	Mewis	pmewis@cleangridalliance.org	Clean Grid Alliance	570 Asbury St. St. Paul, MN 55104	Electronic Service	No	OFF_SL_24-173_M-24-173
Joseph	Meyer	joseph.meyer@ag.state.mn.us	Office of the Attorney General-RUD	Bremer Tower, Suite 1400 445 Minnesota Street St Paul, MN 55101-2131	Electronic Service	No	OFF_SL_24-173_M-24-173
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David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022093	Electronic Service	No	OFF_SL_24-173_M-24-173
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Evan	Mulholland	emulholland@mncenter.org	Minnesota Center for Environmental Advocacy	1919 University Ave W Ste 515 Saint Paul, MN 55101	Electronic Service	No	OFF_SL_24-173_M-24-173
Alan	Muller	alan@greendel.org	Energy & Environmental Consulting	1110 West Avenue Red Wing, MN 55066	Electronic Service	No	OFF_SL_24-173_M-24-173
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency	220 South Sixth Street Suite 1300 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_24-173_M-24-173
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Rolf	Nordstrom	rnordstrom@gpsid.net	Great Plains Institute	2801 21ST AVE S STE 220 Minneapolis, MN 55407-1229	Electronic Service	No	OFF_SL_24-173_M-24-173
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_24-173_M-24-173
David	O'Brien	david.obrien@navigant.com	Navigant Consulting	77 South Bedford St Ste 400 Burlington, MA 01803	Electronic Service	No	OFF_SL_24-173_M-24-173
M. William	O'Brien	bobrien@mojlaw.com	Miller O'Brien Jensen, P.A.	120 S 6th St Ste 2400 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_24-173_M-24-173
Ric	O'Connell	ric@gridlab.org	GridLab	2120 University Ave Berkeley, CA 94704	Electronic Service	No	OFF_SL_24-173_M-24-173
Jeff	O'Neill	jeff.oneill@ci.monticello.mn.us	City of Monticello	505 Walnut Street Suite 1 Monticello, MN 55362	Electronic Service	No	OFF_SL_24-173_M-24-173

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Matthew	Olsen	molsen@otpc.com	Otter Tail Power Company	215 South Cascade Street Fergus Falls, MN 56537	Electronic Service	No	OFF_SL_24-173_M-24-173
Russell	Olson	rolson@hcpd.com	Heartland Consumers Power District	PO Box 248 Madison, SD 570420248	Electronic Service	No	OFF_SL_24-173_M-24-173
Carol A.	Overland	overland@legalelectric.org	Legalelectric - Overland Law Office	1110 West Avenue Red Wing, MN 55066	Electronic Service	No	OFF_SL_24-173_M-24-173
John	Pacheco	johnpachecojr@gmail.com		N/A	Electronic Service	No	OFF_SL_24-173_M-24-173
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_24-173_M-24-173
Jessica	Palmer Denig	jessica.palmer-Denig@state.mn.us	Office of Administrative Hearings	600 Robert St N PO Box 64620 St. Paul, MN 55164	Electronic Service	No	OFF_SL_24-173_M-24-173
Dan	Patry	dpatry@sunedison.com	SunEdison	600 Clipper Drive Belmont, CA 94002	Electronic Service	No	OFF_SL_24-173_M-24-173
Jeffrey C	Paulson	jeff.jcplaw@comcast.net	Paulson Law Office, Ltd.	4445 W 77th Street Suite 224 Edina, MN 55435	Electronic Service	No	OFF_SL_24-173_M-24-173
Jose	Perez	jose@hispanicsinenergy.com	Hispanics in Energy	1017 L Street #719 Sacramento, CA 95814	Electronic Service	No	OFF_SL_24-173_M-24-173

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Hannah	Polikov	hpolikov@aee.net	Advanced Energy Economy Institute	1000 Vermont Ave, Third Floor Washington, DC 20005	Electronic Service	No	OFF_SL_24-173_M-24-173
J. Gregory	Porter	greg.porter@nngco.com	Northern Natural Gas Company	1111 South 103rd St Omaha, NE 68124	Electronic Service	No	OFF_SL_24-173_M-24-173
Kevin	Pranis	kpranis@liunagro.com	Laborers' District Council of MN and ND	81 E Little Canada Road St. Paul, MN 55117	Electronic Service	No	OFF_SL_24-173_M-24-173
David G.	Prazak	dprazak@otpc.com	Otter Tail Power Company	P.O. Box 496 215 South Cascade Street Fergus Falls, MN 565380496	Electronic Service	No	OFF_SL_24-173_M-24-173
Greg	Pruszinske	gpruszinske@ci.becker.mn.us	City of Becker	PO Box 250 12060 Sherburne Ave Becker, MN 55308	Electronic Service	No	OFF_SL_24-173_M-24-173
Kenneth	Rance	krance@sabathani.org	Sabathani Community Center	310 East 38th St Rm #120 Minneapolis, MN 55409	Electronic Service	No	OFF_SL_24-173_M-24-173
Michael	Reinertson	michael.reinertson@avantenergy.com	Avant Energy	220 S. Sixth St. Ste 1300 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_24-173_M-24-173
John C.	Reinhardt	N/A	Laura A. Reinhardt	3552 26th Ave S Minneapolis, MN 55406	Paper Service	No	OFF_SL_24-173_M-24-173

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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_24-173_M-24-173
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Isabel	Ricker	ricker@fresh-energy.org	Fresh Energy	408 Saint Peter Street Suite 220 Saint Paul, MN 55102	Electronic Service	No	OFF_SL_24-173_M-24-173
Noah	Roberts	nroberts@cleanpower.org	Energy Storage Association	1155 15th St NW, Ste 500 Washington, DC 20005	Electronic Service	No	OFF_SL_24-173_M-24-173
Susan	Romans	sromans@allete.com	Minnesota Power	30 West Superior Street Legal Dept Duulth, MN 55802	Electronic Service	No	OFF_SL_24-173_M-24-173
Nathaniel	Runke	nrunkel@local49.org	International Union of Operating Engineers Local 49	611 28th St. NW Rochester, MN 55901	Electronic Service	No	OFF_SL_24-173_M-24-173
Robert K.	Sahr	bsahr@eastriver.coop	East River Electric Power Cooperative	P.O. Box 227 Madison, SD 57042	Electronic Service	No	OFF_SL_24-173_M-24-173
Joseph L	Sathe	jsathe@kennedy-graven.com	Kennedy & Graven, Chartered	150 S 5th St Ste 700 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_24-173_M-24-173
Elizabeth	Schmiesing	eschmiesing@winthrop.com	Winthrop & Weinstine, P.A.	225 South Sixth Street Suite 3500 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_24-173_M-24-173
Jeff	Schneider	jeff.schneider@ci.red-wing.mn.us	City of Red Wing	315 West 4th Street Red Wing, MN 55066	Electronic Service	No	OFF_SL_24-173_M-24-173

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Kay	Schraeder	kschraeder@minnkota.com	Minnkota Power	5301 32nd Ave S Grand Forks, ND 58201	Electronic Service	No	OFF_SL_24-173_M-24-173
Lori	Schultz	lorischultz@minncap.org	Minnesota Community Action Partnership	MCIT Building 100 Empire Dr Ste 202 St. Paul, MN 55103	Electronic Service	No	OFF_SL_24-173_M-24-173
Christine	Schwartz	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_24-173_M-24-173
Douglas	Seaton	doug.seaton@umwlc.org	Upper Midwest Law Center	8421 Wayzata Blvd Ste 300 Golden Valley, MN 55426	Electronic Service	No	OFF_SL_24-173_M-24-173
Dean	Sedgwick	Sedgwick@Itascapower.com	Itasca Power Company	PO Box 455 Spring Lake, MN 56680	Electronic Service	No	OFF_SL_24-173_M-24-173
Maria	Seidler	maria.seidler@dom.com	Dominion Energy Technology	120 Tredegar Street Richmond, VA 23219	Electronic Service	No	OFF_SL_24-173_M-24-173
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_24-173_M-24-173

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Patricia F	Sharkey	psharkey@environmentallawcounsel.com	Midwest Cogeneration Association.	180 N LaSalle St Ste 3700 Chicago, IL 60601	Electronic Service	No	OFF_SL_24-173_M-24-173
Andrew R.	Shedlock	Andrew.Shedlock@KutakRock.com	Kutak Rock LLP	60 South Sixth St Ste 3400 Minneapolis, MN 55402-4018	Electronic Service	No	OFF_SL_24-173_M-24-173
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Colleen	Sipiorski	Colleen.Sipiorski@wecenergygroup.com	Minnesota Energy Resources Corporation	700 North Adams St Green Bay, WI 54307	Electronic Service	No	OFF_SL_24-173_M-24-173
Edyta	Sitko	esitko@ucsusa.org	Union of Concerned Scientists	1 N Lasalle Ave CHICAGO, IL 60602	Electronic Service	No	OFF_SL_24-173_M-24-173
Anne	Smart	anne.smart@chargepoint.com	ChargePoint, Inc.	254 E Hacienda Ave Campbell, CA 95008	Electronic Service	No	OFF_SL_24-173_M-24-173
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Joshua	Smith	joshua.smith@sierraclub.org		85 Second St FL 2 San Francisco, CA 94105	Electronic Service	No	OFF_SL_24-173_M-24-173
Beth	Soholt	bsoholt@cleangridalliance.org	Clean Grid Alliance	570 Asbury Street Suite 201 St. Paul, MN 55104	Electronic Service	No	OFF_SL_24-173_M-24-173
Anna	Sommer	ASommer@energyfuturesgroup.com	Energy Futures Group	PO Box 692 Canton, NY 13617	Electronic Service	No	OFF_SL_24-173_M-24-173
Peggy	Sorum	peggy.sorum@centerpointenergy.com	CenterPoint Energy	505 Nicollet Mall Minneapolis, MN 55402	Electronic Service	No	OFF_SL_24-173_M-24-173
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Alice	Madden	alice@communitypowermn.org	Community Power	2720 E 22nd St Minneapolis, MN 55406	Electronic Service	No	OFF_SL_22-266_M-22-266
Kavita	Maini	kmairi@wi.rr.com	KM Energy Consulting, LLC	961 N Lost Woods Rd Oconomowoc, WI 53066	Electronic Service	No	OFF_SL_22-266_M-22-266
Emily	Marshall	emarshall@mojlaw.com	Miller O'Brien Jensen, PA	120 S. 6th Street Suite 2400 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_22-266_M-22-266
Gregg	Mast	gmast@cleanenergyeconomyymn.org	Clean Energy Economy Minnesota	4808 10th Avenue S Minneapolis, MN 55417	Electronic Service	No	OFF_SL_22-266_M-22-266
Daryl	Maxwell	dmaxwell@hydro.mb.ca	Manitoba Hydro	360 Portage Ave FL 16 PO Box 815, Station Main Winnipeg, MB R3C 2P4 CANADA	Electronic Service	No	OFF_SL_22-266_M-22-266
Taylor	McNair	taylor@gridlab.org		668 Capp Street San Francisco, CA 94110	Electronic Service	No	OFF_SL_22-266_M-22-266
Thomas	Melone	Thomas.Melone@AllcoUS.com	Minnesota Go Solar LLC	222 South 9th Street Suite 1600 Minneapolis, MN 55120	Electronic Service	No	OFF_SL_22-266_M-22-266
Melanie	Mesko Lee	Melanie.Lee@burnsvillemn.gov	City of Burnsville	100 Civic Center Parkway Burnsville, MN 55337-3867	Electronic Service	No	OFF_SL_22-266_M-22-266

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Peder	Mewis	pmewis@cleangridalliance.org	Clean Grid Alliance	570 Asbury St. St. Paul, MN 55104	Electronic Service	No	OFF_SL_22-266_M-22-266
Stacy	Miller	stacy.miller@minneapolismn.gov	City of Minneapolis	350 S. 5th Street Room M 301 Minneapolis, MN 55415	Electronic Service	No	OFF_SL_22-266_M-22-266
David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022093	Electronic Service	No	OFF_SL_22-266_M-22-266
Dalene	Monsebroten	dalene.monsebroten@nmpagency.com	Northern Municipal Power Agency	123 2nd St W Thief River Falls, MN 56701	Electronic Service	No	OFF_SL_22-266_M-22-266
Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP	33 South Sixth St Ste 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_22-266_M-22-266
Evan	Mulholland	emulholland@mncenter.org	Minnesota Center for Environmental Advocacy	1919 University Ave W Ste 515 Saint Paul, MN 55101	Electronic Service	No	OFF_SL_22-266_M-22-266
Alan	Muller	alan@greendel.org	Energy & Environmental Consulting	1110 West Avenue Red Wing, MN 55066	Electronic Service	No	OFF_SL_22-266_M-22-266
Ben	Nelson	benn@cmpasgroup.org	CMPMA	459 South Grove Street Blue Earth, MN 56013	Electronic Service	No	OFF_SL_22-266_M-22-266
Carl	Nelson	cnelson@mncee.org	Center for Energy and Environment	212 3rd Ave N Ste 560 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_22-266_M-22-266
David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency	220 South Sixth Street Suite 1300 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_22-266_M-22-266

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Sephra	Ninow	sephra.ninow@energycenter.org	Center for Sustainable Energy	426 17th Street, Suite 700 Oakland, CA 94612	Electronic Service	No	OFF_SL_22-266_M-22-266
Rolf	Nordstrom	rnordstrom@gpisd.net	Great Plains Institute	2801 21ST AVE S STE 220 Minneapolis, MN 55407-1229	Electronic Service	No	OFF_SL_22-266_M-22-266
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_22-266_M-22-266
David	O'Brien	david.obrien@navigant.com	Navigant Consulting	77 South Bedford St Ste 400 Burlington, MA 01803	Electronic Service	No	OFF_SL_22-266_M-22-266
M. William	O'Brien	bobrien@mojaw.com	Miller O'Brien Jensen, P.A.	120 S 6th St Ste 2400 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_22-266_M-22-266
Ric	O'Connell	ric@gridlab.org	GridLab	2120 University Ave Berkeley, CA 94704	Electronic Service	No	OFF_SL_22-266_M-22-266
Jeff	O'Neill	jeff.oneill@ci.monticello.mn.us	City of Monticello	505 Walnut Street Suite 1 Monticello, MN 55362	Electronic Service	No	OFF_SL_22-266_M-22-266
Nate	O'Reilly	nate@iron512.com	Ironworkers Local #512	851 Pierce Butler Route St Paul, MN 55104	Electronic Service	No	OFF_SL_22-266_M-22-266
Matthew	Olsen	molsen@otpc.com	Otter Tail Power Company	215 South Cascade Street Fergus Falls, MN 56537	Electronic Service	No	OFF_SL_22-266_M-22-266

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Russell	Olson	rolson@hcpd.com	Heartland Consumers Power District	PO Box 248 Madison, SD 570420248	Electronic Service	No	OFF_SL_22-266_M-22-266
Carol A.	Overland	overland@legalelectric.org	Legalelectric - Overland Law Office	1110 West Avenue Red Wing, MN 55066	Electronic Service	No	OFF_SL_22-266_M-22-266
John	Pacheco	johnpachecojr@gmail.com		N/A	Electronic Service	No	OFF_SL_22-266_M-22-266
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_22-266_M-22-266
Jessica	Palmer Denig	jessica.palmer-Denig@state.mn.us	Office of Administrative Hearings	600 Robert St N PO Box 64620 St. Paul, MN 55164	Electronic Service	No	OFF_SL_22-266_M-22-266
Dan	Patry	dpatry@sunedison.com	SunEdison	600 Clipper Drive Belmont, CA 94002	Electronic Service	No	OFF_SL_22-266_M-22-266
Jeffrey C	Paulson	jeff.jcplaw@comcast.net	Paulson Law Office, Ltd.	4445 W 77th Street Suite 224 Edina, MN 55435	Electronic Service	No	OFF_SL_22-266_M-22-266
Jose	Perez	jose@hispanicsinenergy.com	Hispanics in Energy	1017 L Street #719 Sacramento, CA 95814	Electronic Service	No	OFF_SL_22-266_M-22-266
Jennifer	Peterson	jjpeterson@mnpower.com	Minnesota Power	30 West Superior Street Duluth, MN 55802	Electronic Service	No	OFF_SL_22-266_M-22-266
Catherine	Phillips	Catherine.Phillips@wecenergygroup.com	Minnesota Energy Resources	231 West Michigan St Milwaukee, WI 53203	Electronic Service	No	OFF_SL_22-266_M-22-266

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Hannah	Polikov	hpolikov@aee.net	Advanced Energy Economy Institute	1000 Vermont Ave, Third Floor Washington, DC 20005	Electronic Service	No	OFF_SL_22-266_M-22-266
J. Gregory	Porter	greg.porter@nngco.com	Northern Natural Gas Company	1111 South 103rd St Omaha, NE 68124	Electronic Service	No	OFF_SL_22-266_M-22-266
Kevin	Pranis	kpranis@liunagroc.com	Laborers' District Council of MN and ND	81 E Little Canada Road St. Paul, MN 55117	Electronic Service	No	OFF_SL_22-266_M-22-266
David G.	Prazak	dprazak@otpc.com	Otter Tail Power Company	P.O. Box 496 215 South Cascade Street Fergus Falls, MN 565380496	Electronic Service	No	OFF_SL_22-266_M-22-266
Greg	Pruszinske	gpruszinske@ci.becker.mn.us	City of Becker	PO Box 250 12060 Sherburne Ave Becker, MN 55308	Electronic Service	No	OFF_SL_22-266_M-22-266
Kenneth	Rance	krance@sabathani.org	Sabathani Community Center	310 East 38th St Rm #120 Minneapolis, MN 55409	Electronic Service	No	OFF_SL_22-266_M-22-266
Michael	Reinertson	michael.reinertson@avantenergy.com	Avant Energy	220 S. Sixth St. Ste 1300 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_22-266_M-22-266
John C.	Reinhardt	N/A	Laura A. Reinhardt	3552 26th Ave S Minneapolis, MN 55406	Paper Service	No	OFF_SL_22-266_M-22-266
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_22-266_M-22-266
Kevin	Reuther	kreuther@mncenter.org	MN Center for Environmental Advocacy	26 E Exchange St, Ste 206 St. Paul, MN 551011667	Electronic Service	No	OFF_SL_22-266_M-22-266

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Isabel	Ricker	ricker@fresh-energy.org	Fresh Energy	408 Saint Peter Street Suite 220 Saint Paul, MN 55102	Electronic Service	No	OFF_SL_22-266_M-22-266
Noah	Roberts	nroberts@cleanpower.org	Energy Storage Association	1155 15th St NW, Ste 500 Washington, DC 20005	Electronic Service	No	OFF_SL_22-266_M-22-266
Susan	Romans	sromans@allete.com	Minnesota Power	30 West Superior Street Legal Dept Duulth, MN 55802	Electronic Service	No	OFF_SL_22-266_M-22-266
Nathaniel	Runke	nrunke@local49.org	International Union of Operating Engineers Local 49	611 28th St. NW Rochester, MN 55901	Electronic Service	No	OFF_SL_22-266_M-22-266
Robert K.	Sahr	bsahr@eastriver.coop	East River Electric Power Cooperative	P.O. Box 227 Madison, SD 57042	Electronic Service	No	OFF_SL_22-266_M-22-266
Joseph L	Sathe	jsathe@kennedy- graven.com	Kennedy & Graven, Chartered	150 S 5th St Ste 700 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_22-266_M-22-266
Elizabeth	Schmiesing	eschmiesing@winthrop.co m	Winthrop & Weinstine, P.A.	225 South Sixth Street Suite 3500 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_22-266_M-22-266
Jeff	Schneider	jeff.schneider@ci.red- wing.mn.us	City of Red Wing	315 West 4th Street Red Wing, MN 55066	Electronic Service	No	OFF_SL_22-266_M-22-266
Mark	Schoennauer	markwsch@hotmail.com		607 19th St NW Apt 17 Rochester, MN 55901	Electronic Service	No	OFF_SL_22-266_M-22-266
Peter	Scholtz	peter.scholtz@ag.state.mn. us	Office of the Attorney General-RUD	Suite 1400 445 Minnesota Street St. Paul, MN 55101-2131	Electronic Service	No	OFF_SL_22-266_M-22-266

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Kay	Schraeder	kschraeder@minnkota.com	Minnkota Power	5301 32nd Ave S Grand Forks, ND 58201	Electronic Service	No	OFF_SL_22-266_M-22-266
Lori	Schultz	lorischultz@minncap.org	Minnesota Community Action Partnership	MCIT Building 100 Empire Dr Ste 202 St. Paul, MN 55103	Electronic Service	No	OFF_SL_22-266_M-22-266
Christine	Schwartz	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_22-266_M-22-266
Douglas	Seaton	doug.seaton@umwlc.org	Upper Midwest Law Center	8421 Wayzata Blvd Ste 300 Golden Valley, MN 55426	Electronic Service	No	OFF_SL_22-266_M-22-266
Dean	Sedgwick	Sedgwick@Itascapower.com	Itasca Power Company	PO Box 455 Spring Lake, MN 56680	Electronic Service	No	OFF_SL_22-266_M-22-266
Maria	Seidler	maria.seidler@dom.com	Dominion Energy Technology	120 Tredegar Street Richmond, VA 23219	Electronic Service	No	OFF_SL_22-266_M-22-266
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th Pl E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_22-266_M-22-266
Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates	7400 Lyndale Ave S Ste 190 Richfield, MN 55423	Electronic Service	No	OFF_SL_22-266_M-22-266
Patricia F	Sharkey	psharkey@environmentallawcounsel.com	Midwest Cogeneration Association.	180 N LaSalle St Ste 3700 Chicago, IL 60601	Electronic Service	No	OFF_SL_22-266_M-22-266

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Andrew R.	Shedlock	Andrew.Shedlock@KutakRock.com	Kutak Rock LLP	60 South Sixth St Ste 3400 Minneapolis, MN 55402-4018	Electronic Service	No	OFF_SL_22-266_M-22-266
Doug	Shoemaker	dougs@charter.net	Minnesota Renewable Energy	2928 5th Ave S Minneapolis, MN 55408	Electronic Service	No	OFF_SL_22-266_M-22-266
Colleen	Sipiorski	Colleen.Sipiorski@wecenergygroup.com	Minnesota Energy Resources Corporation	700 North Adams St Green Bay, WI 54307	Electronic Service	No	OFF_SL_22-266_M-22-266
Edyta	Sitko	esitko@ucsusa.org	Union of Concerned Scientists	1 N Lasalle Ave CHICAGO, IL 60602	Electronic Service	No	OFF_SL_22-266_M-22-266
Anne	Smart	anne.smart@chargepoint.com	ChargePoint, Inc.	254 E Hacienda Ave Campbell, CA 95008	Electronic Service	No	OFF_SL_22-266_M-22-266
Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.	76 W Kellogg Blvd St. Paul, MN 55102	Electronic Service	No	OFF_SL_22-266_M-22-266
Joshua	Smith	joshua.smith@sierraclub.org		85 Second St FL 2 San Francisco, CA 94105	Electronic Service	No	OFF_SL_22-266_M-22-266
Beth	Smith	bsmith@greatermankato.com	Greater Mankato Growth	1961 Premier Dr Ste 100 Mankato, MN 56001	Electronic Service	No	OFF_SL_22-266_M-22-266
Trevor	Smith	trevor.smith@avantenergy.com	Avant Energy, Inc.	220 South Sixth Street Suite 1300 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_22-266_M-22-266
Amanda	Smith	amanda.smith@state.mn.us	MN Pollution Control Agency	520 Lafayette Rd N St. Paul, MN 55155	Electronic Service	No	OFF_SL_22-266_M-22-266

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Ken	Smith	ken.smith@ever-greenenergy.com	Ever Green Energy	305 Saint Peter St Saint Paul, MN 55102	Electronic Service	No	OFF_SL_22-266_M-22-266
Beth	Soholt	bsoholt@cleangridalliance.org	Clean Grid Alliance	570 Asbury Street Suite 201 St. Paul, MN 55104	Electronic Service	No	OFF_SL_22-266_M-22-266
Anna	Sommer	ASommer@energyfuturesgroup.com	Energy Futures Group	PO Box 692 Canton, NY 13617	Electronic Service	No	OFF_SL_22-266_M-22-266
Peggy	Sorum	peggy.sorum@centerpointenergy.com	CenterPoint Energy	505 Nicollet Mall Minneapolis, MN 55402	Electronic Service	No	OFF_SL_22-266_M-22-266
Mark	Spurr	mspurr@fvbenergy.com	International District Energy Association	222 South Ninth St., Suite 825 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_22-266_M-22-266
Jamez	Staples	jstaples@renewableenergypartners.com	Renewable Energy Partners	3033 Excelsior Blvd S Minneapolis, MN 55416	Electronic Service	No	OFF_SL_22-266_M-22-266
Byron E.	Starns	byron.starns@stinson.com	STINSON LLP	50 S 6th St Ste 2600 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_22-266_M-22-266
Richard	Stasik	richard.stasik@wecenergygroup.com	Minnesota Energy Resources Corporation (HOLDING)	231 West Michigan St - P321 Milwaukee, WI 53203	Electronic Service	No	OFF_SL_22-266_M-22-266
Kristin	Stastny	kstastny@taftlaw.com	Taft Stettinius & Hollister LLP	2200 IDS Center 80 South 8th St Minneapolis, MN 55402	Electronic Service	No	OFF_SL_22-266_M-22-266

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James M	Strommen	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered	150 S 5th St Ste 700 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_22-266_M-22-266
Eric	Swanson	eswanson@winthrop.com	Winthrop & Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_22-266_M-22-266
JB	Tengco	jtengco@bluegreenalliance.org	BlueGreen Alliance	2701 University Ave SE Ste. 209 Minneapolis, MN 55414	Electronic Service	No	OFF_SL_22-266_M-22-266
Stuart	Tommerdahl	stommerdahl@otpco.com	Otter Tail Power Company	215 S Cascade St PO Box 496 Fergus Falls, MN 56537	Electronic Service	No	OFF_SL_22-266_M-22-266
Pat	Treseler	pat.jcplaw@comcast.net	Paulson Law Office LTD	4445 W 77th Street Suite 224 Edina, MN 55435	Electronic Service	No	OFF_SL_22-266_M-22-266
Analeisha	Vang	avang@mnpower.com	Minnesota Power	30 W Superior St Duluth, MN 558022093	Electronic Service	No	OFF_SL_22-266_M-22-266
Julie	Voeck	julie.voeck@nee.com	NextEra Energy Resources, LLC	700 Universe Blvd Juno Beach, FL 33408	Electronic Service	No	OFF_SL_22-266_M-22-266
Curt	Volkman	curt@newenergy-advisors.com	Fresh Energy	408 St Peter St Saint Paul, MN 55102	Electronic Service	No	OFF_SL_22-266_M-22-266
Roger	Warehime	roger.warehime@owatonnautilities.com	Owatonna Municipal Public Utilities	208 S Walnut Ave PO BOX 800 Owatonna, MN 55060	Electronic Service	No	OFF_SL_22-266_M-22-266

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Jenna	Warmuth	jwarmuth@mnpower.com	Minnesota Power	30 W Superior St Duluth, MN 55802-2093	Electronic Service	No	OFF_SL_22-266_M-22-266
Laurie	Williams	laurie.williams@sierraclub.org	Sierra Club	Environmental Law Program 1536 Wynkoop St Ste 200 Denver, CO 80202	Electronic Service	No	OFF_SL_22-266_M-22-266
Justin	Wilson	justin.wilson@chargepoint.com	ChargePoint	240 East Hacienda Ave. Campbell, CA 95008	Electronic Service	No	OFF_SL_22-266_M-22-266
Joseph	Windler	jwindler@winthrop.com	Winthrop & Weinstine	225 South Sixth Street, Suite 3500 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_22-266_M-22-266
Robyn	Woeste	robynwoeste@alliantenergy.com	Interstate Power and Light Company	200 First St SE Cedar Rapids, IA 52401	Electronic Service	No	OFF_SL_22-266_M-22-266
Tim	Wulling	t.wulling@earthlink.net		1495 Raymond Ave. Saint Paul, MN 55108	Electronic Service	No	OFF_SL_22-266_M-22-266
Yochi	Zakai	yzakai@smwlaw.com	SHUTE, MIHALY & WEINBERGER LLP	396 Hayes Street San Francisco, CA 94102	Electronic Service	No	OFF_SL_22-266_M-22-266
Christopher	Zibart	czibart@atcllc.com	American Transmission Company LLC	W234 N2000 Ridgeview Pkwy Court Waukesha, WI 53188-1022	Electronic Service	No	OFF_SL_22-266_M-22-266
Kurt	Zimmerman	kwz@ibew160.org	Local Union #160, IBEW	2909 Anthony Ln St Anthony Village, MN 55418-3238	Electronic Service	No	OFF_SL_22-266_M-22-266

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Emily	Ziring	eziring@stlouispark.org	City of St. Louis Park	5005 Minnetonka Blvd St. Louis Park, MN 55416	Electronic Service	No	OFF_SL_22-266_M-22-266
Patrick	Zomer	Pat.Zomer@lawmoss.com	Moss & Barnett PA	150 S 5th St #1200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_22-266_M-22-266

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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	OFF_SL_19-368_19-368_Official
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_19-368_19-368_Official
Jean	Comstock	jean.comstock.dbcc@gmail.com	St. Paul 350	729 6th St E St. Paul, MN 55106	Electronic Service	No	OFF_SL_19-368_19-368_Official
George	Crocker	gwillc@nawo.org	North American Water Office	5093 Keats Avenue Lake Elmo, MN 55042	Electronic Service	No	OFF_SL_19-368_19-368_Official
James	Denniston	james.r.denniston@xcenergy.com	Xcel Energy Services, Inc.	414 Nicollet Mall, 401-8 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_19-368_19-368_Official
J.	Drake Hamilton	hamilton@fresh-energy.org	Fresh Energy	408 St Peter St Ste 350 Saint Paul, MN 55101	Electronic Service	No	OFF_SL_19-368_19-368_Official
Adam	Duininck	aduininck@ncsrcc.org	North Central States Regional Council of Carpenters	700 Olive Street St. Paul, MN 55130	Electronic Service	No	OFF_SL_19-368_19-368_Official
Brian	Edstrom	briane@cubminnesota.org	Citizens Utility Board of Minnesota	332 Minnesota St Ste W1360 Saint Paul, MN 55101	Electronic Service	No	OFF_SL_19-368_19-368_Official
John	Farrell	jfarrell@ilsr.org	Institute for Local Self-Reliance	2720 E. 22nd St Institute for Local Self-Reliance Minneapolis, MN 55406	Electronic Service	No	OFF_SL_19-368_19-368_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Lucas	Franco	lfranco@liunagroc.com	LIUNA	81 Little Canada Rd E Little Canada, MN 55117	Electronic Service	No	OFF_SL_19-368_19-368_Official
Edward	Garvey	edward.garvey@AESLconsulting.com	AESL Consulting	32 Lawton St Saint Paul, MN 55102-2617	Electronic Service	No	OFF_SL_19-368_19-368_Official
Todd J.	Guerrero	todd.guerrero@kutakrock.com	Kutak Rock LLP	Suite 1750 220 South Sixth Street Minneapolis, MN 554021425	Electronic Service	No	OFF_SL_19-368_19-368_Official
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Philip	Hayet	phayet@jkenn.com	J. Kennedy and Associates, Inc.	570 Colonial Park Drive Suite 305 Roswell, GA 30075-3770	Electronic Service	No	OFF_SL_19-368_19-368_Official
Adam	Heinen	aheinen@dakotaelectric.com	Dakota Electric Association	4300 220th St W Farmington, MN 55024	Electronic Service	No	OFF_SL_19-368_19-368_Official
Annete	Henkel	mui@mutilityinvestors.org	Minnesota Utility Investors	413 Wacouta Street #230 St.Paul, MN 55101	Electronic Service	No	OFF_SL_19-368_19-368_Official
Kristin	Henry	kristin.henry@sierraclub.org	Sierra Club	2101 Webster St Ste 1300 Oakland, CA 94612	Electronic Service	No	OFF_SL_19-368_19-368_Official

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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_19-368_19-368_Official
Alan	Jenkins	aj@jenkinsatlaw.com	Jenkins at Law	2950 Yellowtail Ave. Marathon, FL 33050	Electronic Service	No	OFF_SL_19-368_19-368_Official
Richard	Johnson	Rick.Johnson@lawmoss.com	Moss & Barnett	150 S. 5th Street Suite 1200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-368_19-368_Official
Sarah	Johnson Phillips	sarah.phillips@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-368_19-368_Official
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Samuel B.	Ketchum	sketchum@kennedy-graven.com	Kennedy & Graven, Chartered	150 S 5th St Ste 700 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-368_19-368_Official
Frank	Kohlasch	frank.kohlasch@state.mn.us	MN Pollution Control Agency	520 Lafayette Rd N. St. Paul, MN 55155	Electronic Service	No	OFF_SL_19-368_19-368_Official
Brian	Kolbinger	brian@beckertownship.org	Becker Township Board	PO Box 248 12165 Hancock St Becker, MN 55308	Electronic Service	No	OFF_SL_19-368_19-368_Official
Kay	Kuhlmann	Teri.Swanson@ci.red-wing.mn.us	City Of Red Wing	315 West Fourth Street Red Wing, MN 55066	Electronic Service	No	OFF_SL_19-368_19-368_Official
Brenda	Kyle	bkyle@stpaulchamber.com	St. Paul Area Chamber of Commerce	401 N Robert Street Suite 150 St Paul, MN 55101	Electronic Service	No	OFF_SL_19-368_19-368_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_19-368_19-368_Official
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