

February 24, 2026

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

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

Dear Ms. Bergman,

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

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

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

The Department submits these reply comments in response to Xcel's TEP. The Department recommends approval of the TEP with modifications. The Department is available to answer any questions the Minnesota Public Utilities Commission may have.

Sincerely,

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

RW/BP/ar
Attachment

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Acronyms and Abbreviations

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



Before the Minnesota Public Utilities Commission

Comments of the Minnesota Department of Commerce

Docket No. E002/M-25-142

I. INTRODUCTION

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

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

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

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

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

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

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

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

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

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

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

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

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

⁶ 2025 TEP, at 52-68.

⁷ Notice.

II. PROCEDURAL BACKGROUND

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

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

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

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

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

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

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

¹⁴ *Id.*, at 9.

November 1, 2025	Xcel Energy Files its 2025 TEP ¹⁵ and IDP.
November 13, 2025	The Commission issued its Notice of Comment Period in the present docket denoting TEP comments are to be filed ahead of the Proactive Upgrade Proposal and IDP comments. ¹⁶
January 13, 2026	The Department, along with many other parties, filed initial comments on Xcel's TEP. ¹⁷
February 3, 2026	Xcel Energy filed reply comments in the present docket. ¹⁸

Topic(s) open for comment:

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

¹⁵ 2025 TEP.

¹⁶ Notice.

¹⁷ *In the Matter of Xcel Energy's 2025 Integrated Distribution Plan*, Department Initial Comments, January 13, 2026, Docket No. E002/M-25-142, (eDockets) [20261-226852-01](#) (hereinafter "Department Initial Comments").

¹⁸ *In the Matter of Xcel Energy's 2025 Integrated Distribution Plan*, Xcel Energy Reply Comments, February 3, 2026, Docket No. E002/M-25-142, (eDockets) [20262-227801-01](#) (hereinafter "Xcel Reply Comments").

III. DEPARTMENT ANALYSIS

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

In evaluating the Company’s Charging Perks proposal in its initial comments, the Department analyzed the Company’s proposal under the relevant statute, Minn. Stat. § 216B.1615.¹⁹ Subdivision 1 of Minn. Stat. § 216B.1615 defines relevant terms. Subdivision 2 defines the contents of the TEP public utilities are required to file. Subdivision 3 of the statute gives authority to the Commission to approve, modify, or reject a TEP and the rubric under which that decision is to be made. Subdivision 4 of the statute gives the Commission authority to approve cost recovery under Minn. Stat. § 216B.16²⁰ for investments made and expenses incurred under an approved plan.

The Department additionally recognizes the importance of electrifying Minnesota’s transportation sector consistent with both the Commission’s February 1, 2019 Order in Docket No. E999/CI-17-879 (EV Inquiry Order)²¹ and subsequent Orders in similar proceedings.

In its initial comments, the Department provided a preliminary analysis of the Company’s two ECO proposals (the Commercial EV Infrastructure Rebate and Advisory Program and the Residential Advisory Services and Guided Charging Installation Program) for fitness for ECO review and the Company’s intention to comply with the ECO statute—Minn. Stat. §216B.241.²² The Department responds to the Company’s status update on its ECO filings in the present comments, but reserves any recommendations for the ultimate review in the relevant proceeding.

A. APPROVE, MODIFY, OR REJECT

The Department responds to the following notice topics:

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

The Department recommends the Commission approve Xcel Energy’s TEP as modified herein. The Department’s full list of recommendations can be found in section IV.

¹⁹ Minnesota EV Deployment Program Statute.

²⁰ [Minn. Stat. § 216B.16](#)

²¹ *In the Matter of a Commission Inquiry into Electric Vehicle Charging and Infrastructure, Order Making Findings and Requiring Filings*, February 1, 2019, Docket No. E-999/CI-17-879, (eDockets) [20192-149933-02](#) (hereinafter “EV Inquiry Order”).

²² Department Initial Comments, at 14-19.

B. EQUITABLE CUSTOMER OUTCOMES

The Department responds to the following notice topic:

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

Minn. Stat. § 216B.1615,²³ subd. 2(b)(5) provides that a TEP may include “programs targeting transportation electrification in low- and moderate-income communities in neighborhoods most affected by transportation-related air emissions.” Minn. Stat. § 216B.1615,²⁴ Subd. 3(2) requires Commission consideration of whether the TEP proposals are reasonably expected to “increase access to the use of electricity as transportation fuel for all customers, including those in low- and moderate-income communities, rural communities, and communities most affected by air emissions from the transportation sector.” In addition, the Commission’s August 23, 2023 Order required Xcel to include in its TEP “a breakdown by proposal of what percent of investments or enrolled customers Xcel estimates will be located in environmental-justice areas as defined by Minn. Stat. § 216B.1691, Subd. 1(e) (2023 Minn. Laws ch. 7, sec. 3).”²⁵

Xcel positions its Clean Transportation Portfolio as a tool to “reduc[e] identified barriers to transportation electrification in a cost-effective way while also promoting equity and environmental justice.”²⁶ Xcel structures the equity section explicitly around Order Point 21.f of the Commission’s May 9, 2024 Order in Docket No. E002/M-23-452,²⁷ which focuses on the Company’s performance across five primary criteria: transportation pollution, housing density, racial demographics, income levels, and rural accessibility. The Company performs geospatial analyses of program sites against Minnesota Pollution Control Agency (MPCA) Environmental Justice (EJ) indicators and pollution data and provides an overview of the Company’s transportation programs relative to EJ and pollution-based burdened areas—an equity analysis of the Company’s transportation portfolio is provided in the 2025 TEP.²⁸

B.1. Equity Analysis of Existing Programs

The Department requested in initial comments that Xcel, in reply comments, identify the specific program design and implementation barriers that have limited enrollment among renters and residents of the identified communities, with particular attention to landlord approval requirements, split incentive issues, and gaps in program awareness.

In response, the Company explains that its residential offerings, including the EVAAH programs and EV Charger and Wiring Rebates, are aimed at reducing barriers to home charging installation.²⁹ The

²³ Minnesota EV Deployment Program Statute.

²⁴ *Ibid.*

²⁵ August 23, 2023 Order at Order Point 5.H. *See also*, [Minn. Stat. § 216B.1691, subd. 1\(e\)](#) (2023).

²⁶ 2025 TEP, at 42.

²⁷ *In The Matter of Xcel Energy’s 2023 Integrated Distribution Plan, Order Approving Xcel Energy’s 2023 Transportation Electrification Plan with Modifications*, May 9, 2024, Docket No. E-002/M-23-452, (eDockets) [20245-206560-01](#).

²⁸ 2025 TEP, at 42-49.

²⁹ Xcel Reply Comments, at 2.

Company states the design and implementation barriers that its residential offerings seek to address include:

- Meter requirements,
- Vehicle requirements,
- Cost,
- Customer awareness, and
- Complicated contractual issues.³⁰

The Company's states its residential programs require a dedicated meter, making them largely unsuitable for multi-dwelling unit (MDU) applications. While the Company identifies costs as a potential barrier for some program,³¹ it asserts that the financial incentives offered within its residential programs are sufficient to drive participation and enable customers to install home charging.³² The Company reports that participation in its residential programs has met or exceeded forecasted participation expectations. Xcel states that the participation rates in its residential programs indicate that the programs are working to address design and implementation barriers. However, critical gaps remain in the Company's approach to MDU and under-served communities. The Company cites lack of awareness regarding customer technical needs and program availability as a barrier to greater participation.³³

In response to the challenges of the MDU market, Xcel has proposed to shift towards a rebate-based model for MDUs, which represents a significant pivot from the previous utility-owned pilot. By removing the requirement for utility ownership and the associated "complicated contracting,"³⁴ Xcel aims to allow site hosts more flexibility in billing and maintenance. While the Department acknowledges the shift may streamline the installation timeline, it notes that this model shifts long-term operational responsibility and potential financial risk away from the utility and on to property owners or third-party (Charging as a Service) providers.

The Department remains concerned that the Company's strategy for addressing "lack of awareness" as a primary barrier beyond current participation levels is insufficient for reaching those most in need. The Company's current solution relies heavily on general outreach at broad-interest events (Minnesota State Fair, the Twin Cities Auto Show, and Coon Rapids Farmer's Market).³⁵ While these events reach thousands, it is unclear if such wide-net strategy effectively target historically under-served communities or address the specific barriers faced by residents in high-poverty or MDU-majority areas.

³⁰ Xcel Reply Comments, at 2.

³¹ *Ibid.*

³² *Ibid.*

³³ *Ibid.*

³⁴ *Id.*, at 3.

³⁵ *Id.*, at 4.

The Department recommends the Commission require Xcel to provide a detailed community engagement plan within 90 days of Commission Order that specifically targets high-poverty and MDU-majority census tracts to address the persistent under-reach of residential programs.

In initial comments, the Department requested that Xcel propose concrete strategies to address the barriers to enrollment, including measures to streamline property owner approvals and detailed community engagement plans tailored to historically under-served areas to increase enrollment and sustained participation.³⁶

In its reply comments, the Company summarizes how several of its programs work to address the barriers mentioned above:

- Expanded Eligibility: The Company states it has proposed making its EV Charger and Wiring Rebate more accessible by making it available to customers on Time of Use (TOU) rates.³⁷
- Cost Burdens: The Company states its tiered rebate structures, which include increased incentives for income-qualified and EJ customers, is designed to address cost burdens.
- Awareness: The Company states its Guided Advisory Program proposed in ECO is aimed at providing technical support and financial education to increase customer awareness.³⁸
- MDU Flexibility: For its customers that live in MDUs, Xcel is proposing a rebate model for charger installations, which allows for a broader range of possible charging solutions for customers and allows for less contracting needs between the site host and the Company when compared to the utility-owned model. The rebate model also allows for a broader range of ownership and billing arrangements, as well as contractor choice for MDU site hosts.³⁹

The Department views the expansion of eligibility and elevated incentives as a necessary-but-not-sufficient step towards achieving equitable adoption. The Department notes that financial incentives alone may not resolve the split-incentive issue if landlord approval remains a bottleneck despite the simplified rebate contracts. While the rebate model grants more autonomy to site hosts, it also shifts long-term operational responsibility away from the utility.

The Department recommends the Commission approve the expansion of the EV Charger and Wiring Rebate eligibility to TOU customers to reduce barriers.

B.1.1. Persistent residential under-reach in priority geographies

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

³⁶ Department Initial Comments, at 8.

³⁷ Xcel Reply Comments, at 3.

³⁸ *Id.*, at 4.

³⁹ *Ibid.*

observed for several commercial pilot programs and are inconsistent with an equitable distribution of benefits.

These patterns mirror widely documented EV adoption dynamics, in which early home charging programs tend to skew toward higher-income homeowners with garages and existing access to capital, rather than renters and lower-income households.⁴⁰ In this case, however, the under-reach is not hypothetical; it is evident in the Company's screening results.

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

In response, the Company states its EVAAH and the EV Charger and Wiring Rebate programs are designed to lower financial burdens of accessing Level 2 charging. The Company summarizes EVAAH options that include zero-upfront installation and a rental option for charging infrastructure.⁴¹ The Company states that customers who participate in the Company's EVAAH offerings are also eligible for a rebate instantly to offset the costs of electrician services. The Company explains that customers do not need to be enrolled in EVAAH to receive a rebate, however the customer will have to submit their invoice to the Company after services are complete to receive the rebate.⁴²

OYC, the Company explains, is not intended to reduce upfront cost barriers for consumers looking to electrify.⁴³ The Company clarifies that the intent of OYC is to manage grid constraints created by EV adoption by providing financial incentives to customers for their active participation in the program. Customers enrolled in OYC could qualify for the Home Wiring or EV Charger rebates states Xcel.⁴⁴

Additionally, Xcel highlights its partnership with HOURCAR. Xcel states that its partnership helps to further improve access and reduce cost barriers for individuals who do not own a vehicle.⁴⁵ The majority of HOURCAR users tend to be students and other residents in dense urban areas that rely on shared vehicles for essential trips. In 2024, the Company states that 44 percent of total utilization of Evie came from low-income users, which the Company correlates to those with the highest transportation needs.⁴⁶ The Company discusses survey data that shows HOURCAR meaningfully

⁴⁰ Lee, Dong-Yeon, Melanie H. McDermott, Benjamin K. Sovacool, and Raphael Isaac. "Toward just and equitable mobility: Socioeconomic and perceptual barriers for electric vehicles and charging infrastructure in the United States." *Energy and Climate Change* 5 (2024): [100146](#).

⁴¹ Xcel Reply Comments at 5.

⁴² *Ibid.*

⁴³ *Ibid.*

⁴⁴ *Id.*, at 5-6.

⁴⁵ *Id.*, at 6

⁴⁶ *Ibid.*

impacts the need for personal vehicle ownership and investment—77 percent of respondents reported that HOURCAR allowed them to delay or avoid purchasing a vehicle.⁴⁷

The Department recommends the Commission require Xcel to develop and report on specific enrollment targets for LMI and MDU residents within its residential portfolio to ensure that program benefits are distributed equitably across all priority geographies.

C. EV ACCELERATE AT HOME MODIFICATIONS

The Department requested Xcel provide additional record development around the drivers of the proposed increase to the monthly customer charge for the EVAAH programs, including a comparison of the costs and revenues for the programs.⁴⁸ In response to the Department’s request, Xcel pointed to pages 9 and 10 of its most recent EV Annual Report.⁴⁹ In its most recent EV Annual Report, the Company states it has incurred \$4,528,298 in costs related to operating its EVAAH programs since the inception of the programs.⁵⁰ The Company reports it has collected \$2,851,281 in revenues since the inception of the programs—\$1,191,682 in revenues in the last 12 months (April 2024 to March 31, 2025).⁵¹ The Company does not present the last 12 months of revenues in either the TEP or the Annual EV Report. However, it is clear costs to operate the EVAAH programs are exceeding revenues overall.

The Department also requested Xcel explain if or how the Enel X shutdown has impacted the costs of its EVAAH programs and how the shutdown may have contributed to the need to increase the customer charge for the EVAAH programs.⁵² The Company responded stating that the Enel X shutdown did increase the Company’s costs to operate the EVAAH program.⁵³ The Company also discusses that the electricians supporting the Company’s EVAAH programs had revised their service rates and the revisions are reflected in the revised pricing for both the Pay-as-You-Go option and the Voluntary Charger Service.⁵⁴

The proposed monthly customer charge revisions for Xcel’s Pay-as-You-Go program and the Voluntary Charger Service program are relatively minor, as shown in the Department-created tables below.

⁴⁷ Xcel Reply Comments, at 6.

⁴⁸ *Ibid.*

⁴⁹ *Id.*, at footnote 28.

⁵⁰ *In the Matter of Xcel Energy’s Annual Electric Vehicle Charging Tariffs, Programs, and Pilots Report, 2025 Annual Report, Xcel Energy*, May 30, 2025, Docket Nos. E002/M-15-111, E002/M-17-817, E002/M-18-643, E002/M-19-186, E002/M-19-559, E002/M-20-711, E002/M-20-745, E002/M-21-101, (eDockets) [20255-219454-01](#) (hereinafter: Annual EV Report), at Table 2 at 9.

⁵¹ *Id.*, Table 3 at 10.

⁵² *Id.*, at 14.

⁵³ *Id.*, at 23.

⁵⁴ *Ibid.*

Table 1: Residential EVAAH Pay-As-You-Go Service Monthly Customer Charge

Rate	Previous	Proposed
Bundled (A80)	\$16.63	\$17.00
Pre-Pay/Installation only (A81) (Closed)	\$5.95	\$5.28
BYOC	\$6.73	\$7.77

Source: 2025 TEP, Attachment H, at 2.

Table 2: Residential EVAAH Voluntary Service Monthly Customer Charge

Rate	Previous	Proposed
Bundled (A76)	\$11.99	\$12.73
Pre-Pay/Installation Only Option (A77) (Closed)	\$1.31	\$1.00

Source: 2025 TEP, Attachment H, at 4.

Xcel’s proposed revisions to the monthly customer charge for the EVAHH Subscription Service Program are more substantial. Xcel’s proposed revisions to the monthly customer charge for the Subscription Service Program represent a move to the recently approved residential TOU rate and the cost of providing off-peak charging.⁵⁵ The residential TOU rate increases the off-peak rate for the Subscription Service from \$0.038250 to \$0.07479 per kWh.⁵⁶ The Department concludes the higher off-peak rate under the new residential TOU rate is the main driver for the increase to the subscription service program monthly customer charge.

The Department recommends the Commission approve Xcel’s request to increase the monthly customer charge for its EVAAH Subscription Service, Pay-as-You-Go program, and its Voluntary Charger Service programs.

The Department is concerned about the overall cost-effectiveness of the EVAAH program. As stated above, overall costs of the program exceed revenues. The current record does not elaborate on the shortcomings of the program’s revenues, nor discuss if the proposed modifications will fully close the gap.

The Department recommends the Commission require Xcel to evaluate the cost-effectiveness of its EVAAH programs in its 2025 Annual EV Report.

⁵⁵ 2025 TEP, at 70.

⁵⁶ 2025 TEP, Attachment H, at 5.

D. COMMERCIAL EV INFRASTRUCTURE REBATE AND ADVISORY PROGRAM

D.1. ECO Review

The Department requested Xcel provide a status update on its Commercial EV Infrastructure Rebate and Advisory Program ECO modification filing in its reply comments. The Company filed on January 16, 2026 to include the Commercial EV Infrastructure Rebate and Advisory Program in its ECO portfolio.⁵⁷ The Department continues to reiterate that the Department will complete a fulsome review in the ECO process.⁵⁸

D.2. Closure of Commercial EV Pilots

In initial comments, the Department recommended the Commission deny, without prejudice, Xcel's request to close its Commercial EV Pilots to new customers pending the review of and decision on its replacement program in ECO.⁵⁹ Xcel explains in reply comments that it does not plan to close its pilots entirely until all projects within the pilot process are completed, but that adding new projects to the pilot would create additional complexities, if the plan is to close the pilot in the near future.⁶⁰ The company reiterates the request to close the Commercial EV pilots in the TEP proceeding contingent on the Department's approval of its Commercial EV Rebate program in the ECO modification docket and the completion of the ongoing pilot projects.⁶¹ This additional nuance assuages the Department's concerns from initial comments.

The Department recommends the Commission approve the request to close the Commercial EV pilots to new customers contingent on the Department's decision on its Commercial EV Rebate program in the ECO modification docket and the completion of the ongoing pilot projects.

D.3. Rebate Auditing and Compliance Procedures

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

The Company explains its process of implementing similar rebate programs to the Commercial EV Rebate program stating that the process starts with an application where payee information and customer and payee signature are required.⁶² Xcel states there is often an advisory meeting held to align the installation contractor and customer to meet requirements. The Company states that rebate

⁵⁷ *In the Matter of Xcel Energy's Modification to its 2024-2026 Minnesota Electric and Natural Gas Energy Conservation and Optimization Program*, Xcel Energy, January 16, 2026, Docket No. E,G002/CIP-23-92, (eDockets) [20261-227035-01](#).

⁵⁸ Department Initial Comments, at 16-17.

⁵⁹ Department Initial Comments, at 34.

⁶⁰ Xcel Reply Comments, at 7.

⁶¹ *Ibid.*

⁶² *Id.*, at 8.

applications are scored using factors such as geography, electric load, project type, and cost intended to promote equitable funding, including incentives for environmental justice areas.⁶³ The Company explains that it institutes clear invoicing standards requiring contractors to show rebate amounts directly deducted from the customer's invoice. All projects must submit close-out documentation—including photos of installed equipment, final site plans, and electrical drawings—while large installations receive an on-site audit after construction.⁶⁴ Throughout Xcel's process, its EV Concierge and Program Management Team provides ongoing support with technical, program, and billing guidance.⁶⁵

The Department recommends the Commission require Xcel to file an audit report with the Company's Annual EV Report that verifies the full rebate amount deduction from the end-user's final invoice. The audit report should also track and report the geographic and demographic distribution of participating vendors to ensure the program effectively supports small, rural, and community-based contractors.

E. RESIDENTIAL ADVISORY SERVICES AND GUIDED CHARGING INSTALLATION PROGRAM

The Department requested Xcel provide a status update on its Residential Advisory Services and Guided Charging ECO modification filing in reply comments. As discussed in section D above, the Company filed its ECO modification regarding both the Commercial EV Rebate program and the Residential Advisory Services and Guided Charging Program.⁶⁶ The Company expands on its statement regarding the Commercial EV Rebate Program, stating it intends to seek cost recovery through the CIP Tracker Account for the applicable year, followed by a request to adjust the CIP Adjustment Factor to recover the costs for the previous year.⁶⁷ Any cost recovery is contingent on Department review and approval in ECO.

F. CHARGING PERKS ACTIVE MANAGED CHARGING PROGRAM

F.1. Analysis of Program Operations

In initial comments, the Department asked the Company to include in its reply comments a discussion of the feasibility of incorporating daytime charging windows into its proposal to leverage utility-scale solar generation and designing logic to shift load away from 'calm' (low wind) nighttime periods.⁶⁸ The Company explains that its program's current algorithm incorporates daytime charging for participating customers and optimizes charging to happen at times of high renewables by leveraging a renewable forecast that is dispatched daily to its managed charging vendors.⁶⁹ Should the customer's charging

⁶³ *Ibid.*

⁶⁴ *Ibid.*

⁶⁵ *Ibid.*

⁶⁶ Xcel Reply Comments, at 11.

⁶⁷ *Id.*, at 11-12.

⁶⁸ Department Initial Comments, at 24.

⁶⁹ Xcel Reply Comments, at 17.

preferences allow for it, their charging schedule may shift to daytime hours when the EV signal has high forecasts for renewables.⁷⁰ The Company states that the customer could also use the “charge now” function to override the set charging schedules.⁷¹

Relatedly, the Company discusses the Department’s request the Company discuss in greater detail how it intends to meet participants’ “ready by” time.⁷² The Company explains that the vendors’ scheduling algorithms prioritize customer preferences to ensure that the car is ready when the customer needs it. The Company further explains that customer “ready by” times supersede renewable optimized charging schedules to ensure the customer’s preferences are met. As stated above, a customer could always override the schedule to begin charging immediately.⁷³

F.2. Analysis of Optimal Program Implementation

In initial comments, the Department requested Xcel, in reply comments, provide geographic analysis demonstrating the distribution of ‘standard’ vs. ‘distribution optimized’ customer enrollment across 1) census tracts with high poverty concentrations, 2) environmental justice areas, 3) communities of color, and 4) rural communities. The Department requested the analysis include projected enrollment by feeder to demonstrate whether the higher annual incentive tier will reach historically underserved populations or concentrate in higher-income, EV dense neighborhoods.⁷⁴ Further, the Department requested Xcel review its proposed incentive amount to determine the optimal incentive level needed to achieve the participation rates necessary to defer distribution upgrades.⁷⁵

The Company agrees that the analysis requested by the Department is necessary for implementation. As such, the Company states in reply comments it is currently working to establish methods and processes for determining the needs of the system.⁷⁶ The Company commits to sharing the results when the analysis is complete and the results are available.⁷⁷

Minn. Stat. § 216B.1615, subd. 3(2) requires Commission consideration of whether the TEP proposals are reasonably expected to “increase access to the use of electricity as a transportation fuel for all customers, including those in low- and moderate-income communities, rural communities, and communities most affected by air emissions from the transportation sector.”⁷⁸ The Department asserts the analysis requested in initial comments will be important in assessing whether or not revisions to the Charging Perks program are necessary to fulfil the requirements of Minn. Stat. § 216B.1615, subd. 3(2).⁷⁹

⁷⁰ *Ibid.*

⁷¹ *Ibid.*

⁷² *Id.*, at 29.

⁷³ Xcel Reply Comments, at 18.

⁷⁴ Department Initial Comments, at 12.

⁷⁵ *Id.*, at 22.

⁷⁶ Xcel Reply Comments, at 15.

⁷⁷ *Ibid.*

⁷⁸ [Minn. Stat. § 216B.1615, subd. 3\(2\)](#) (2023).

⁷⁹ [Minn. Stat. § 216B.1615, subd. 3\(2\)](#) (2023).

Moreover, the Department requested in initial comments that Xcel, in reply comments, discuss the feasibility of a hardware-neutral integration tier, which should allow customers with incompatible vehicles to participate by using networked EVSE and open communication standards, thereby mitigating the technical limitation of any single software vendor.⁸⁰ The Company did not directly address the Department's request to discuss the feasibility of a hardware-neutral integration tier. The Department asserts that maximizing participation eligibility is paramount to recognizing the most environmental and demand management potential of managed charging. As stated by the Department in initial comments, if more than half of EVs are technically excluded from the program due to telematics requirements, then the potential for statewide emission reductions, as required for consideration by Minn. Stat. § 216B.1615, subd. 3(5), are significantly hampered.⁸¹

The Department recommends the Commission require Xcel Energy to file a compliance filing within 90 days of Commission Order discussing the results of its analysis showing the projected enrollment trends of Standard and Distribution Optimized Customers, specifically on projected enrollment trends in EJ Areas and census tracts with high poverty rates, communities of color and rural areas. The filing should also include the Company's review of the proposed incentive levels and, if different from the proposed incentive level, the optimal incentive level needed to achieve participation rates necessary to defer distribution upgrades as requested by the Department in initial comments. Further, the filing should include a discussion of the feasibility of including a hardware-neutral integration tier.

Further, the Department asked the Company to explain how it is working to address the administrative and operational challenges cited with the software vendors that were utilized in the OYC Pilot and will be used with Charging Perks.⁸² The Company responds stating that it is currently working to integrate managed charging vendor platforms with its Salesforce customer relationship management system to simplify customer enrollment and tracking.⁸³ The integration of vendor programs with Salesforce will allow for a more direct line of sight to customer connectivity and enrollment status thus allowing for more efficient enrollment management and customer communication. The integration process is expected to be finalized in 2026.⁸⁴

The Company's responses to the Department's requests make the Charging Perks proposal appear less than fully baked. The Company appears to be working toward important implementation steps, but the steps, such as software integration and geographic analysis of where a 'standard' versus a 'distribution optimized' customer may be located, are not complete. In response to an Office of the Attorney General—Residential Utilities Division (OAG) request, the Company states it is not opposed to operating Charging Perks as a pilot program, agreeing that active managed charging is a new technology with many unanswered questions.⁸⁵ Moreover, the Company declines to provide tariff

⁸⁰ *Id.*, at 24-25.

⁸¹ [Minn. Stat. § 216B.1615, subd. 3\(5\)](#) (2023) and Department Initial Comments, at 27.

⁸² *Id.*, at 23.

⁸³ Xcel Reply Comments, at 16.

⁸⁴ Xcel Reply Comments, at 17.

⁸⁵ *Id.*, at 21-22.

sheets for the program, as requested by the Department in initial comments,⁸⁶ citing the same concerns with the nascency of the technology and the market.⁸⁷ The Company argues that tariff sheets would hinder the Company's flexibility and agility to respond to a developing market.⁸⁸ As such the Company States it is not opposed to classifying Charging Perks as a pilot, if approved, and reassessing the designation in the next TEP.⁸⁹

The Department continues to highlight the importance of tariff sheets for utility offerings, regardless of a program's designation as a pilot or a permanent offering. It is common practice for the implementation of a new utility program to include the filing of tariff sheets to reflect the new rates or program details. Tariff sheets provide the Commission, stakeholders, and ratepayers with crucial information regarding the operation of a program or rate. The Department reiterates that a Company's publicly available rate book is an important reference for ratepayers that can be used to compare the rates and programs available to them. Furthermore, a tariffed program allows for regulatory oversight of program modifications, as modifications to a tariff require Commission approval.⁹⁰

The Company also continues to note in its reply comments, as it discussed in its initial filing, that the implementation costs of the proposal currently exceed quantifiable program benefits and that more cost-effective solutions are necessary to realize potential benefits of a managed charging program in the future.⁹¹

The Department agrees that managed charging presents the opportunity for grid benefits as stated in initial comments.⁹² The strategic value of Charging Perks arises from its capacity to provide localized grid relief and enhanced integration of DERs. By actively managing EV load on constrained feeders, the Company aims to reduce peak demand on local transformers and feeders, thereby deferring capital-intensive grid infrastructure upgrades that would otherwise be required to support unmanaged EV charging. Furthermore, the software-driven optimization aligns EV charging sessions with periods of high wind and solar generation, thereby minimizing renewable energy curtailment and maximizing the use of low-carbon energy. These operational efficiencies are intended to generate system-wide benefits that lower the cost of electric service for all ratepayers, as shifting load to off-peak periods improves the utilization of existing grid assets. The program also includes an emergency demand response feature, which would allow Xcel to request a one-to-two-hour pause in charging during rare grid stability events.⁹³

Furthermore, the Commission's EV Inquiry Order found active management to be additive to rate design toward the cost-effective implementation of EVs on the electric system:

⁸⁶ Department Initial Comments, at 29.

⁸⁷ Xcel Reply Comments, at 18.

⁸⁸ *Ibid.*

⁸⁹ *Id.*, 21-22.

⁹⁰ Department Initial Comments, at 29.

⁹¹ *Id.*, at 19.

⁹² Department Initial Comments, at 24.

⁹³ *Ibid.*

Smart or managed charging takes rate design a step further by enabling the utility to actively manage the charging load. Chargers can be equipped with two-way communication capabilities between the utility and the EV, which allows the utility to remotely control the rate of EV charging in order to meet a local or regional system need. For example, the utility could ramp up EV charging during times of high wind generation, and the utility could curtail charging during peak demand in areas with high EV penetration to defer the need for distribution infrastructure upgrades.⁹⁴

However, as acknowledged by Xcel, the technology is relatively new, there are limitations to participation based on vehicle OEMs, the costs outweigh the quantifiable benefits, and the Company is still exploring important program implementation steps (such as integrating vendor platforms into salesforce and determining if its incentives are the optimal level). Implementation of the proposal as a pilot may moderate some concern, given the malleability of a pilot when compared to a permanent program and review/compliance requirements that can be added to pilots.

In response to an OAG comment that the Company did not provide a roadmap for how the proposed reporting requirements would be used to improve cost-effectiveness in the future, the Company responded that its proposed metrics will allow for extensive cost benefit analysis to be done on a regular basis.⁹⁵ Xcel states that its proposed reporting metrics, when paired with customer surveys and system planning data, will be used to allocate program resources, adjust Distribution Optimized customer criteria and alter scheduling and dispatching strategies in ways that maximize cost effectiveness.⁹⁶ The Department appreciates that the Company plans to continue to work in the background to optimize the Program after approval, however, the Department is concerned the Commission may approve a program in this proceeding that materially evolves without oversight. The Department believes that paired with the compliance filing requested above, piloting the program, requiring regular reporting, tariff sheets, and ultimate review in the next TEP could address the concerns surrounding the program, before the program potentially becomes permanent.

The Department recommends the Commission require Xcel Energy to implement its Charging Perks program as a pilot.

The Department recommends the Commission require Xcel to include an update on the pilot in the Company's next TEP, to be filed November 2027.

As modifications to a tariffed program would require Commission approval of the tariffed elements, the Commission process would allow for stakeholder review of the program changes. ***The Department recommends the Commission require, within 30 days of Order issuance, Xcel to file tariff sheets reflecting final EV pilot incentives, terms and conditions, and budget.***

⁹⁴ EV Inquiry Order at 5.

⁹⁵ Xcel Reply Comments, at 22.

⁹⁶ *Ibid.*

***The Department continues to recommend its reporting requirements from initial comments, and the approval of the reporting requirements proposed by Xcel.*⁹⁷**

F.3. Closure of OYC Pilots – Tariff Modification

The Department continues to find that the closure of the OYC pilot to new enrollment is a reasonable step once a permanent program is in place. However, the Department emphasizes that this closure should be contingent on the Commission's final decision regarding the successor program.⁹⁸

In initial comments, the Department requested Xcel, in reply comments, provide a detailed transition timeline for OYC Pilot participants, including how they will be notified of pilot closure and the specific process for opting into the new incentive structure. The Department further requested Xcel describe the communication strategy for participants ineligible to enroll in Charging Perks due to vehicle or charging compatibility issues.

In response, the Company states it plans for a 6-month window between potential Charging Perks approval and closure of the OYC program. This time will be used for emails and phone calls with customers to inform them of the status of the transition and opportunity to opt-out. Customers with eligible chargers or vehicles will be notified through email that the OYC program is closing and the ability to opt-in to the Charging Perks program. The intent is to transition as many OYC customers as possible to Charging Perks. The Company states there are many overlapping chargers and vehicles that are eligible for participation in both programs. If a customer has a vehicle ineligible for Charging Perks, they may be able to participate with an eligible charger. The Company intends to contact customers with ineligible chargers or vehicles with a list of eligible models as well as information encouraging customers to take advantage of the EV Charge and Home Wiring rebates offered by the Company, if needed to become eligible. Customers who are otherwise ineligible, and still want to receive benefits of off-peak charging, will be encouraged to enroll in the Company's TOU rate.⁹⁹

The Department recommends the Commission approve Xcel's request to close its OYC Pilot to new customers contingent on the launch of the Charging Perks pilot program.

G. PROPOSED TARIFF CHANGES

The Department responds to the following notice topic:

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

The Department addresses the Energy Rate modification below, as requested by the Notice Topic.

⁹⁷ Department Initial Comments, at 30-31.

⁹⁸ *Id.*, at 31.

⁹⁹ Xcel Reply Comments, at 19.

Xcel proposes to align the energy rates and time-of-use (TOU) Rate Periods of its EV programs with the recently approved Residential TOU rate periods in Docket No. E002/M-23-524. Historically, states Xcel, its EVAAH programs and its multi-dwelling unit pilots have used the same pricing as its residential TOU rates.¹⁰⁰ The Company states that it previously proposed a similar tariff revision which was denied without prejudice by the Commission. In its May 15, 2025 Order, the Commission denied Xcel's proposed request to update its residential electric vehicle rates to align with the TOU approved within the Order, stating the Commission:

will deny the Company's request to update its residential electric vehicle rates to align with the time-of-use rates approved herein. Instead, the Company will be further required to provide an analysis of, and any recommended changes to, its existing residential electric vehicle charging rates to accommodate longer off-peak time periods that allow for Level 1 charging and the ability to stagger the start time of electric vehicle charging in its Transportation Electrification Plan due November 1, 2025.¹⁰¹

The Commission continues with its Order Point 9:

The Company must provide an analysis of, and any recommended changes to, its existing residential electric vehicle charging rates to accommodate longer off-peak time periods that allow for Level 1 charging and the ability to stagger the start time of electric vehicle charging in its Transportation Electrification Plan due November 1, 2025.¹⁰²

As identified in the Department's initial comments, the Company does not respond to "the ability to stagger the start time of electric vehicle charging,"¹⁰³ as ordered by the Commission.¹⁰⁴ The Department requested in initial comments that Xcel discuss whether there are benefits to extending its off-peak periods to allow for staggered electric vehicle charging.

At this time, the Company does not support lengthening its off-peak period.¹⁰⁵ However the Company states it is currently in the process of developing a new TOU rate proposal for its commercial and industrial customers to be proposed in March 2026.¹⁰⁶ If it is determined in that case that a longer off-peak period is reasonable, and stakeholders and the Commission are supportive, the Company would also propose modifications to its Residential TOU rate and EV tariffs. Changes to the residential TOU

¹⁰⁰ 2025 TEP at 70.

¹⁰¹ *In the Matter of the Petition of Xcel Energy for approval of a Residential Time of Use Rate Design, Order Approving Revised Opt-in proposal and Setting Reporting Requirements*, May 15, 2025, Docket no. E002/M-23-524, (eDockets) [20255-218995-01](#) (hereinafter: "TOU Order"), at 6.

¹⁰² TOU Order, at order point 9.

¹⁰³ TOU Order, at Order Point 9.

¹⁰⁴ Department Initial Comments, at 33.

¹⁰⁵ Xcel Reply Comments, at 24-25.

¹⁰⁶ *Id.*, at 25.

rate to reflect changes in the approved general service TOU rate, the Company states, would promote fairness across rate classes and be more reflective of future system loads and costs.¹⁰⁷

The Department continues to recommend, as it did in the Company’s Residential TOU proceeding, that the Commission require Xcel to change the rates and peak periods in the Residential EV Accelerate at Home Pay as You Go Service, Residential Electric Vehicle Subscription Pilot Service, and Multi-Dwelling Unit Electric Vehicle Service Pilot tariffs to reflect the approved residential TOU rates and peak periods.¹⁰⁸

H. OTHER ISSUES

The Department responds to the following notice topic:

Are there other issues or concerns related to this matter?

The Department has no additional concerns at this time.

I. RECOMMENDATIONS MAINTAINED FROM INITIAL COMMENTS

The Department maintains the following recommendations from initial comments:

- The Department recommends the Commission set a cost cap for Charging Perks at the budget approved by the Commission.
- The Department recommends the Commission require Xcel Energy to report on its Charging Perks pilot yearly and in both the present docket as well as the Company’s Annual EV Report.
- The Department recommends the Commission approve Xcel Energy’s proposed reporting requirements for Charging Perks.
- The Department recommends the following additional reporting requirements for Charging Perks:
 - The rate at which the Company met the participants’ “ready-by” time,
 - Customer satisfaction with the program,
 - The opt-out rate for the program broken out into the following categories,
 - Involuntary customer opt-out for not meeting the terms and conditions of the program,
 - Voluntary customer opt-out.
 - Whether any additional vehicles or charger models are eligible to participate in the program, including a discussion of the approximate percentage of vehicles on the road eligible to participate in the program.
 - If additional data access fees have been incurred to allow greater vehicle or charger model eligibility and participation,

¹⁰⁷ *Ibid.*

¹⁰⁸ *In the Matter of the Petition of Northern States Power Company, dba Xcel Energy, for Approval of a Residential Time of Use Rate Design*, Department, Initial Comments, October 15, 2024, Docket No. E002/M-23-524, (eDockets) [202410-210987-01](#).

- How the additional data access fees have impacted program costs.
- The Department continues to recommend, as it did in the Company's Residential TOU proceeding, that the Commission require Xcel to change the rates and peak periods in the Residential EV Accelerate at Home Pay As You Go Service, Residential Electric Vehicle Subscription Pilot Service, and Multi-Dwelling Unit Electric Vehicle Service Pilot tariffs to reflect the approved residential TOU rates and peak periods.
- The Department recommends the Commission approve Xcel's tariff revisions to remove the language restricting participation in its EVAAH programs by net-metering customers.

IV. DEPARTMENT RECOMMENDATIONS

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

A. APPROVE, MODIFY, OR REJECT

- A. The Department recommends the Commission approve Xcel Energy's TEP as modified herein.

B. EQUITABLE CUSTOMER OUTCOMES

- B.1. The Department recommends the Commission require Xcel to provide a detailed community engagement plan within 90 days of Commission Order that specifically targets high-poverty and MDU-majority census tracts to address the persistent under-reach of residential programs.
- B.1. The Department recommends the Commission approve the expansion of the EV Charger and Wiring Rebate eligibility to TOU customers to reduce barriers.
- B.1.1. The Department recommends the Commission require Xcel to develop and report on specific enrollment targets for LMI and MDU residents within its residential portfolio to ensure that program benefits are distributed equitably across all priority geographies.

C. EV ACCELERATE AT HOME MODIFICATIONS

- C. The Department recommends the Commission approve Xcel's request to increase the monthly customer charge for its EVAAH Subscription Service, Pay-as-You-Go program, and its Voluntary Charger Service programs.
- C. The Department recommends the Commission require Xcel to evaluate the cost-effectiveness of its EVAAH programs in its 2025 Annual EV Report.

D. COMMERCIAL EV INFRASTRUCTURE REBATE AND ADVISORY PROGRAM

- D.2. The Department recommends the Commission approve the request to close the Commercial EV pilots to new customers contingent on the Department's decision on its

Commercial EV Rebate program in the ECO modification docket and the completion of the ongoing pilot projects.

- D.3. The Department recommends the Commission require Xcel to file an audit report with the Company's Annual EV Report that verifies the full rebate amount deduction from the end-user's final invoice. The audit report should also track and report the geographic and demographic distribution of participating vendors to ensure the program effectively supports small, rural, and community-based contractors.

F. CHARGING PERKS ACTIVE MANAGED CHARGING PROGRAM

- F.2. The Department recommends the Commission require Xcel Energy to file a compliance filing within 90 days of Commission Order discussing the results of its analysis showing the projected enrollment trends of Standard and Distribution Optimized Customers, specifically on projected enrollment trends in EJ Areas and census tracts with high poverty rates, communities of color and rural areas. The filing should also include the Company's review of the proposed incentive levels and, if different from the proposed incentive level, the optimal incentive level needed to achieve participation rates necessary to defer distribution upgrades as requested by the Department in initial comments. Further, the filing should include a discussion of the feasibility of including a hardware-neutral integration tier.
- F.2. The Department recommends the Commission require Xcel Energy to implement its Charging Perks program as a pilot.
- F.2. The Department recommends the Commission require Xcel to include an update on the pilot in the Company's next TEP, to be filed November 2027.
- F.2. The Department recommends the Commission require, within 30 days of Order issuance, Xcel to file tariff sheets reflecting final EV pilot incentives, terms and conditions, and budget.

G. PROPOSED TARIFF CHANGES

- G.2. The Department recommends the Commission approve the request to close the Commercial EV pilots to new customers contingent on the Department's decision on its Commercial EV Rebate program in the ECO modification docket and the completion of the ongoing pilot projects.

I. RECOMMENDATIONS MAINTAINED FROM INITIAL COMMENTS

- The Department recommends the Commission set a cost cap for Charging Perks at the budget approved by the Commission.
- The Department recommends the Commission require Xcel Energy to report on its Charging Perks pilot yearly and in both the present docket as well as the Company's Annual EV Report.
- The Department recommends the Commission approve Xcel Energy's proposed reporting requirements for Charging Perks.
- The Department recommends the following additional reporting requirements for Charging Perks:
 - The rate at which the Company met the participants' "ready-by" time,
 - Customer satisfaction with the program,

- The opt-out rate for the program broken out into the following categories,
 - Involuntary customer opt-out for not meeting the terms and conditions of the program,
 - Voluntary customer opt-out.
- Whether any additional vehicles or charger models are eligible to participate in the program, including a discussion of the approximate percentage of vehicles on the road eligible to participate in the program.
 - If additional data access fees have been incurred to allow greater vehicle or charger model eligibility and participation,
- How the additional data access fees have impacted program costs.
- The Department continues to recommend, as it did in the Company's Residential TOU proceeding, that the Commission require Xcel to change the rates and peak periods in the Residential EV Accelerate at Home Pay As You Go Service, Residential Electric Vehicle Subscription Pilot Service, and Multi-Dwelling Unit Electric Vehicle Service Pilot tariffs to reflect the approved residential TOU rates and peak periods.
- The Department recommends the Commission approve Xcel's tariff revisions to remove the language restricting participation in its EVAAH programs by net-metering customers.

Appendix

Appendix

Attachments

CERTIFICATE OF SERVICE

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

**Minnesota Department of Commerce
Reply Comments**

Docket No. E002/M-25-142

Dated this **24th** day of **February 2026**

/s/Sharon Ferguson

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17	Jeff	Benson	jbenson@southcentralelectric.com	South Central Electric Association		PO Box 150 71176 Tiell Drive St. James MN, 56081 United States	Electronic Service		No	M-25-142
18	Sasha	Bergman	sasha.bergman@state.mn.us		Public Utilities Commission	121 7th PI E Ste 350 St. Paul MN, 55101 United States	Electronic Service		Yes	M-25-142
19	Derek	Bertsch	derek.bertsch@mrenergy.com	Missouri River Energy Services		3724 West Avera Drive PO Box 88920 Sioux Falls SD, 57109-8920 United States	Electronic Service		No	M-25-142
20	Barb	Bischoff	barb.bischoff@nngco.com	Northern Natural Gas Co.		CORP HQ, 714 1111 So. 103rd Street Omaha NE, 68124-1000 United States	Electronic Service		No	M-25-142
21	Ingrid	Bjorklund	ibjorklund@avisenlegal.com	Avisen Legal		901 S. Marquette Ave. #1675 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-142
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24	Kenneth	Bradley	kbradley@environmentminnesota.org			2837 Emerson Ave S Apt CW112 Minneapolis MN, 55408 United States	Electronic Service		No	M-25-142
25	Jon	Brekke	jbrekke@grenergy.com	Great River Energy		12300 Elm Creek Boulevard Maple Grove MN, 55369-4718 United States	Electronic Service		No	M-25-142
26	Kathleen	Brennan	kbrennan@spencerfane.com	Spencer Fane LLP		100 South Fifth Street, Suite 2500 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-142
27	Sydney R.	Briggs	sbriggs@swce.coop	Steele-Waseca Cooperative Electric		2411 W. Bridge St PO Box 485 Owatonna MN, 55060-0485 United States	Electronic Service		No	M-25-142
28	Mark B.	Bring	mbring@otpc.com	Otter Tail Power Company		215 South Cascade Street	Electronic Service		No	M-25-142

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						PO Box 496 Fergus Falls MN, 56538-0496 United States				
29	Matthew	Brodin	mbrodin@allete.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	M-25-142
30	Ed	Brolin	ed.brolin@rwe.com	RWE Clean Energy		100 Summit Lake Drive Suite 210 Valhalla NY, 10595 United States	Electronic Service		No	M-25-142
31	Christopher	Browning	christopher.browning@nexteraenergy.com			null null, null United States	Electronic Service		No	M-25-142
32	Christina	Brusven	cbrusven@fredlaw.com	Fredrikson Byron		60 S 6th St Ste 1500 Minneapolis MN, 55402-4400 United States	Electronic Service		No	M-25-142
33	Mike	Bull	mike.bull@state.mn.us		Public Utilities Commission	121 7th Place East, Suite 350 St. Paul MN, 55101 United States	Electronic Service		Yes	M-25-142
34	Jerry	Byer	jbyer@itasca-mantrap.com	Itasca-Mantrap Electric Cooperative		PO Box 192 Park Rapids MN, 56470 United States	Electronic Service		No	M-25-142
35	Jennifer	Cady	jjcady@mnpower.com	Minnesota Power		30 W Superior St Duluth MN, 55802 United States	Electronic Service		No	M-25-142
36	Daniel T	Carlisle	todd-wad@toddwadena.coop	Todd-Wadena Electric Cooperative		550 Ash Ave NE PO Box 431 Wadena MN, 56482 United States	Electronic Service		No	M-25-142
37	Douglas M.	Carnival	dcarnival@carnivalberns.com	McGrann Shea Carnival Straughn & Lamb		800 Nicollet Mall Ste 2600 Minneapolis MN, 55402-7035 United States	Electronic Service		No	M-25-142
38	Pat	Carruth	pat@mnvalleyrec.com	Minnesota Valley Coop. Light & Power Assn.		501 S 1st St. PO Box 248 Montevideo MN, 56265 United States	Electronic Service		No	M-25-142
39	Gabriel	Chan	gabechan@umn.edu			130 Hubert H. Humphrey Center 301 19th Ave S Minneapolis MN, 55455 United States	Electronic Service		No	M-25-142
40	Ray	Choquette	rchoquette@agp.com	Ag Processing Inc.		12700 West Dodge Road PO Box 2047 Omaha NE, 68103-2047 United States	Electronic Service		No	M-25-142
41	Eric	Clement	eclement@mnpower.com	Minnesota Power		null null, null United States	Electronic Service		No	M-25-142
42	City	Clerk	gregg.engdahl@ci.stcloud.mn.us	City of St. Cloud		400 Second St. S	Electronic Service		No	M-25-142

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						St. Cloud MN, 56301 United States				
43	Joshua	Cohen	josh.cohen@swtchenergy.com	SWTCH Energy, Inc.		Greentown Labs 444 Somerville Avenue Somerville MA, 02143 United States	Electronic Service		No	M-25-142
44	Kenneth A.	Colburn	kcolburn@symbioticstrategies.com	Symbiotic Strategies, LLC		26 Winton Road Meredith NH, 32535413 United States	Electronic Service		No	M-25-142
45	Steve	Coleman	stevecolemanpuma@gmail.com			231 Winifred St W Saint Paul MN, 55107 United States	Electronic Service		No	M-25-142
46	Generic	Commerce Attorneys	commerce.attorneys@ag.state.mn.us		Office of the Attorney General - Department of Commerce	445 Minnesota Street Suite 1400 St. Paul MN, 55101 United States	Electronic Service		Yes	M-25-142
47	Kevin	Cray	kevin@communitysolaraccess.org	CCSA		1644 Platte St Denver CO, 80202 United States	Electronic Service		No	M-25-142
48	George	Crocker	gwillc@nawo.org	North American Water Office		5093 Keats Avenue Lake Elmo MN, 55042 United States	Electronic Service		No	M-25-142
49	Stacy	Dahl	sdahl@minnkota.com	Minnkota Power Cooperative, Inc.		5301 32nd Ave S Grand Forks ND, 58201 United States	Electronic Service		No	M-25-142
50	George	Damian	gdamian@cleanenergyeconomymn.org	Clean Energy Economy MN		13713 Washburn Ave S Burnsville MN, 55337 United States	Electronic Service		No	M-25-142
51	Lisa	Daniels	lisadaniels@windustry.org	Windustry		201 Ridgewood Ave Minneapolis MN, 55403 United States	Electronic Service		No	M-25-142
52	James	Darabi	james.darabi@solarfarm.com			2355 Fairview Ave #101 St. Paul MN, 55113 United States	Electronic Service		No	M-25-142
53	Cody	Davis	cdavis@epeconsulting.com	Electric Power Engineers (ELPC/VS)		null null, null United States	Electronic Service		No	M-25-142
54	Danielle	DeMarre	danielle.demarre@allenergysolar.com	All Energy Solar		1264 Energy Lane St Paul MN, 55108 United States	Electronic Service		No	M-25-142
55	Timothy	DenHerder Thomas	timothy@cooperativeenergyfutures.com	Cooperative Energy Futures		3500 Bloomington Ave. S Minneapolis MN, 55407 United States	Electronic Service		No	M-25-142
56	James	Denniston	james.r.denniston@xcelenergy.com	Xcel Energy Services, Inc.		414 Nicollet Mall, 401-8 Minneapolis MN, 55401 United States	Electronic Service		No	M-25-142

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
57	Carrie	Desmond	carrie.desmond@metrotransit.org	Metropolitan Council		560 6th Avenue North Minneapolis MN, 55411 United States	Electronic Service		No	M-25-142
58	Curt	Dieren	curt.dieren@dgr.com	L&O Power Cooperative		1302 S Union St Rock Rapids IA, 51246 United States	Electronic Service		No	M-25-142
59	Cheryl	Dietrich	cheryl.dietrich@nexteraenergy.com	NextEra Energy Resources, LLC		700 Universe Blvd E1W/JB Juno Beach FL, 33408 United States	Electronic Service		No	M-25-142
60	Diane	Dietz	diane.dietz@state.mn.us		Department of Commerce	Suite 280 85 Seventh Place East St. Paul MN, 55101-2198 United States	Electronic Service		No	M-25-142
61	Ian M.	Dobson	ian.m.dobson@xcelenergy.com	Xcel Energy		414 Nicollet Mall, 401-8 Minneapolis MN, 55401 United States	Electronic Service		No	M-25-142
62	Kristin	Dolan	kdolan@meeker.coop	Meeker Cooperative Light & Power Assn		1725 US Hwy 12 E. Ste 100 Litchfield MN, 55355 United States	Electronic Service		No	M-25-142
63	Renee	Doyle	guydoyleelectric@gmail.com	Doyle Electric Inc.		PO Box 295 Amboy MN, 56010 United States	Electronic Service		No	M-25-142
64	Carlton	Doyle Fontaine	carlton.doyle.fontaine@senate.mn	MN Senate		75 Rev Dr Martin Luther King Jr Blvd Room G-17 St Paul MN, 55155 United States	Electronic Service		No	M-25-142
65	Adam	Duininck	aduininck@ncsrcc.org	North Central States Regional Council of Carpenters		700 Olive Street St. Paul MN, 55130 United States	Electronic Service		No	M-25-142
66	Scott	Dunbar	sdunbar@kfwlaw.com	Keyes & Fox LLP		1580 Lincoln St Ste 880 Denver CO, 80203 United States	Electronic Service		No	M-25-142
67	John R.	Dunlop, P.E.	jdunlop@resminn.com	Renewable Energy Services		Suite 300 448 Morgan Ave. S. Minneapolis MN, 55405-2030 United States	Electronic Service		No	M-25-142
68	Hannah	Dunn	hannah.dunn@oakdalemn.gov	City of Oakdale		1584 Hadley Ave N Oakdale MN, 55104 United States	Electronic Service		No	M-25-142
69	Kelly	Dybdahl	kdybdahl@llec.coop	Lyon-Lincoln Electric Cooperative, Inc.		205 W. Hwy. 14 Tyler MN, 56178 United States	Electronic Service		No	M-25-142
70	Brian	Edstrom	briane@cubminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota St Ste W1360 Saint Paul MN, 55101 United States	Electronic Service		No	M-25-142
71	Dick	Edwards	dedwards@ci.maple-grove.mn.us	City of Maple Grove		12800 Arbor Lakes Parkway	Electronic Service		No	M-25-142

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						P O Box 1180 Maple Grove MN, 55311- 6180 United States				
72	William	Ehrlich	wehrlich@tesla.com	Tesla, Inc.		3500 Deer Creek Rd Palo Alto CA, 94304 United States	Electronic Service		No	M-25- 142
73	Kristen	Eide Tollefson	healingsystems69@gmail.com	R-CURE		28477 N Lake Ave Frontenac MN, 55026- 1044 United States	Electronic Service		No	M-25- 142
74	Bob	Eleff	bob.eleff@house.mn	Regulated Industries Cmte		100 Rev Dr Martin Luther King Jr Blvd Room 600 St. Paul MN, 55155 United States	Electronic Service		No	M-25- 142
75	R. Neal	Elliot	rnelliott@aceee.org	American Council for an Energy-Efficient Economy		ACEEE 529 14th St NW Ste 600 Washington DC, 20045 United States	Electronic Service		No	M-25- 142
76	Nadav	Enbar	nenbar@epri.com	EPRI		1117 Quince Ave Boulder CO, 80304 United States	Electronic Service		No	M-25- 142
77	John	Farrell	jfarrell@ilsr.org	Institute for Local Self- Reliance		2720 E. 22nd St Institute for Local Self- Reliance Minneapolis MN, 55406 United States	Electronic Service		No	M-25- 142
78	Christian	Fenstermacher	christian.fenstermacher@owatonnautilities.com	Owatonna Municipal Public Utilities		PO Box 800 208 S Walnut Ave Owatonna MN, 55060 United States	Electronic Service		No	M-25- 142
79	Sharon	Ferguson	sharon.ferguson@state.mn.us		Department of Commerce	85 7th Place E Ste 280 Saint Paul MN, 55101- 2198 United States	Electronic Service		No	M-25- 142
80	Christine	Fox	cfox@itasca-mantrap.com	Itasca-Mantrap Coop. Electric Assn.		PO Box 192 Park Rapids MN, 56470 United States	Electronic Service		No	M-25- 142
81	Kornbaum	Frank	fkornbaum@mnpower.com			null null, null United States	Electronic Service		No	M-25- 142
82	Nathan	Franzen	nathan@nationalgridrenewables.com	Geronimo Energy, LLC		8400 Normandale Lake Blvd Ste 1200 Bloomington MN, 55437 United States	Electronic Service		No	M-25- 142
83	David	Freestate	dfreestate@epri.com	EPRI		942 Corridor Park Blvd Knoxville TN, 37932 United States	Electronic Service		No	M-25- 142
84	Katelyn	Frye	kfrye@mnpower.com	Minnesota Power		30 W Superiot St Duluth MN, 55802-2093 United States	Electronic Service		No	M-25- 142

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

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						United States				
101	Kim	Havey	kim.havey@minneapolismn.gov	City of Minneapolis		350 South 5th Street, Suite 315M Minneapolis MN, 55415 United States	Electronic Service		No	M-25-142
102	Todd	Headlee	theadlee@dvigridsolutions.com	Dominion Voltage, Inc.		701 E. Cary Street Richmond VA, 23219 United States	Electronic Service		No	M-25-142
103	Amber	Hedlund	amber.r.hedlund@xcelenergy.com	Northern States Power Company dba Xcel Energy-Elec		414 Nicollet Mall, 401-7 Minneapolis MN, 55401 United States	Electronic Service		No	M-25-142
104	Tiana	Heger	theger@mnpower.com	Minnesota Power		30 W. Superior Street Duluth MN, 55802 United States	Electronic Service		No	M-25-142
105	Adam	Heinen	aheinen@dakotaelectric.com	Dakota Electric Association		4300 220th St W Farmington MN, 55024 United States	Electronic Service		No	M-25-142
106	Annete	Henkel	mui@mutilityinvestors.org	Minnesota Utility Investors		413 Wacouta Street #230 St.Paul MN, 55101 United States	Electronic Service		No	M-25-142
107	Jessy	Hennesy	jessy.hennesy@avantenergy.com	Avant Energy		220 S. Sixth St. Ste 1300 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-142
108	Mari	Hernandez	mari@irecusa.org	IREC		null null, null United States	Electronic Service		No	M-25-142
109	Katherine	Hinderlie	katherine.hinderlie@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	445 Minnesota St Suite 1400 St. Paul MN, 55101-2134 United States	Electronic Service		No	M-25-142
110	Joe	Hoffman	ja.hoffman@smmpa.org	SMMPA		500 First Ave SW Rochester MN, 55902-3303 United States	Electronic Service		No	M-25-142
111	Michael	Hoppe	lu23@ibew23.org	Local Union 23, I.B.E.W.		445 Etna Street Ste. 61 St. Paul MN, 55106 United States	Electronic Service		No	M-25-142
112	Casey	Horan	choran@edf.org	Environmental Defense Fund		123 Mission St San Francisco CA, 94105 United States	Electronic Service		No	M-25-142
113	Ronald	Horman	rhorman@redwoodelectric.com	Redwood Electric Cooperative		60 Pine Street Clements MN, 56224 United States	Electronic Service		No	M-25-142
114	Frank	Hornstein	frank.hornstein@minneapolismn.gov	City of Minneapolis		350 South 5th Street Minneapolis MN, 55415 United States	Electronic Service		No	M-25-142
115	Samantha	Houston	shouston@ucsusa.org	Union of Concerned Scientists		1825 K St. NW Ste 800 Washington	Electronic Service		No	M-25-142

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						DC, 20006 United States				
116	Lori	Hoyum	lhoyum@mnpower.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	M-25-142
117	Jan	Hubbard	jan.hubbard@comcast.net			7730 Mississippi Lane Brooklyn Park MN, 55444 United States	Electronic Service		No	M-25-142
118	Dean	Hunter	dean.hunter@state.mn.us		Minnesota Department of Labor & Industry	443 Lafayette Rd N St. Paul MN, 55155-4341 United States	Electronic Service		No	M-25-142
119	Reuben	Hunter	bhunter@madisonei.com	Madison Energy Investments		8100 Boone Blvd Suite 430 Vienna VA, 22182 United States	Electronic Service		No	M-25-142
120	Casey	Jacobson	cjacobson@bepc.com	Basin Electric Power Cooperative		1717 East Interstate Avenue Bismarck ND, 58501 United States	Electronic Service		No	M-25-142
121	John S.	Jaffray	jjaffray@jirpower.com	JJR Power		350 Highway 7 Suite 236 Excelsior MN, 55331 United States	Electronic Service		No	M-25-142
122	Robert	Jagusch	rjagusch@mmua.org	MMUA		3025 Harbor Lane N Minneapolis MN, 55447 United States	Electronic Service		No	M-25-142
123	Chris	Jarosch	chris@carrcreekelectricservice.com	Carr Creek Electric Service, LLC		209 Sommers Street North Hudson WI, 54016 United States	Electronic Service		No	M-25-142
124	Alan	Jenkins	aj@jenkinsatlaw.com	Jenkins at Law		2950 Yellowtail Ave. Marathon FL, 33050 United States	Electronic Service		No	M-25-142
125	Richard	Johnson	rickjohnson@cozen.com	Cozen O'Connor		150 S. 5th Street Suite 1200 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-142
126	Sarah	Johnson Phillips	sjphillips@stoel.com	Stoel Rives LLP		33 South Sixth Street Suite 4200 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-142
127	Nate	Jones	njones@hcpd.com	Heartland Consumers Power		PO Box 248 Madison SD, 57042 United States	Electronic Service		No	M-25-142
128	Philip	Jones	phil@evtransportationalliance.org			1402 Third Ave Ste 1315 Seattle WA, 98101 United States	Electronic Service		No	M-25-142
129	Julie	Jorgensen	julie@greenmark.us.com	Greenmark Solar		4630 Quebec Ave N New Hope MN, 55428-4973 United States	Electronic Service		No	M-25-142

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

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
144	Steve	Kosbab	skosbab@meeker.coop	Meeker Cooperative Light and Power		1725 US Hwy 12 E Litchfield MN, 55355 United States	Electronic Service		No	M-25-142
145	Nathan	Kostiuk	nathan.c.kostiuk@xcelenergy.com	Xcel Energy		414 Nicollet Mall, 401-07 Minneapolis MN, 55401 United States	Electronic Service		No	M-25-142
146	Brian	Krambeer	bkrambeer@mienergy.coop	MiEnergy Cooperative		PO Box 626 31110 Cooperative Way Rushford MN, 55971 United States	Electronic Service		No	M-25-142
147	Michael	Krause	michaelkrause61@yahoo.com			1200 Plymouth Avenue Minneapolis MN, 55411 United States	Electronic Service		No	M-25-142
148	Michael	Krikava	mkrikava@taftlaw.com	Taft Stettinius & Hollister LLP		2200 IDS Center 80 S 8th St Minneapolis MN, 55402 United States	Electronic Service		No	M-25-142
149	Corrina	Kumpe	ckumpe@mysunshare.com			null null, null United States	Electronic Service		No	M-25-142
150	Matthew	Lacey	mlacey@greenergy.com	Great River Energy		12300 Elm Creek Boulevard Maple Grove MN, 55369-4718 United States	Electronic Service		No	M-25-142
151	James D.	Larson	james.larson@avantenergy.com	Avant Energy Services		220 S 6th St Ste 1300 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-142
152	Mark	Larson	mlarson@meeker.coop	Meeker Coop Light & Power Assn		1725 Highway 12 E Ste 100 Litchfield MN, 55355 United States	Electronic Service		No	M-25-142
153	Burnell	Lauer	blauer.sundial@gmail.com	Sundial Solar		3209 W. 76th St #305 Edina MN, 55435 United States	Electronic Service		No	M-25-142
154	Dean	Leischow	dean@sunriseng.com	Sunrise Energy Ventures		315 Manitoba Ave Ste 200 Wayzata MN, 55391 United States	Electronic Service		No	M-25-142
155	Annie	Levenson Falk	annielf@cubminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota Street, Suite W1360 St. Paul MN, 55101 United States	Electronic Service		No	M-25-142
156	Benjamin	Levine	blevine@mnpower.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	M-25-142
157	Becky	Li	bli@rmi.org			17 State St 25th floor unit 2500 New York NY, 10004 United States	Electronic Service		No	M-25-142

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

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
172	Gregg	Mast	gmast@cleanenergyeconomymn.org	Clean Energy Economy Minnesota		4808 10th Avenue S Minneapolis MN, 55417 United States	Electronic Service		No	M-25-142
173	Jason	Maur	jason.maur@renesolapower.com	Renosola Power Holdings, LLC		850 Canal Street 3rd Floor Stamford CT, 06902 United States	Electronic Service		No	M-25-142
174	Erica	McConnell	emcconnell@elpc.org	Environmental Law & Policy Center		35 E. Wacker Drive, Suite 1600 Chicago IL, 60601 United States	Electronic Service		No	M-25-142
175	Jess	McCullough	jmccullough@mnpower.com	Minnesota Power		30 W Superior St Duluth MN, 55802 United States	Electronic Service		No	M-25-142
176	Sara G	McGrane	smcgrane@felhaber.com	Felhaber Larson		220 S 6th St Ste 2200 Minneapolis MN, 55420 United States	Electronic Service		No	M-25-142
177	Natalie	McIntire	natalie.mcintire@gmail.com	Wind on the Wires		570 Asbury St Ste 201 Saint Paul MN, 55104-1850 United States	Electronic Service		No	M-25-142
178	Matthew	Melewski	matthew@theboutiquefirm.com	Nokomis Energy LLC & Ole Solar LLC		2639 Nicollet Ave Ste 200 Minneapolis MN, 55408 United States	Electronic Service		No	M-25-142
179	Thomas	Melone	thomas.melone@allcous.com	Minnesota Go Solar LLC		222 South 9th Street Suite 1600 Minneapolis MN, 55120 United States	Electronic Service		No	M-25-142
180	Michael	Menzel	mike.m@sagiliti.com	Sagiliti		23505 Smithtown Rd. Suite 280 Excelsior MN, 55331 United States	Electronic Service		No	M-25-142
181	Tim	Mergen	tmergen@meecker.coop	Meecker Cooperative Light And Power		1725 US Hwy 12 E. Suite 100 PO Box 68 Litchfield MN, 55355 United States	Electronic Service		No	M-25-142
182	Pontius	Mike	mpontius@mnpower.com			null null, null United States	Electronic Service		No	M-25-142
183	Brian	Millberg	fwengineering@comcast.net			695 Grand Ave #222 Saint Paul MN, 55105 United States	Electronic Service		No	M-25-142
184	Luther	Miller	luther.c.miller@xcelenergy.com	Xcel Energy		null null, null United States	Electronic Service		No	M-25-142
185	Marc	Miller	mmiller@soltage.com	Soltage, LLC		66 York Street, 5th Floor Jersey City NJ, 07302 United States	Electronic Service		No	M-25-142
186	Marcus	Mills	marcus@communitypowermn.org	Community Power		2720 E 22nd St	Electronic Service		No	M-25-142

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						Minneapolis MN, 55406 United States				
187	Darrick	Moe	darrick@mrea.org	Minnesota Rural Electric Association		11640 73rd Ave N Maple Grove MN, 55369 United States	Electronic Service		No	M-25- 142
188	Dalene	Monsebroten	dalene.monsebroten@nmpagency.com	Northern Municipal Power Agency		123 2nd St W Thief River Falls MN, 56701 United States	Electronic Service		No	M-25- 142
189	Brian	Monson	brian.t.monson@xcelenergy.com	Xcel Energy		null null, null United States	Electronic Service		No	M-25- 142
190	Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP		33 South Sixth St Ste 4200 Minneapolis MN, 55402 United States	Electronic Service		No	M-25- 142
191	Susan	Mudd	smudd@elpc.org	Environmental Law and Policy Center		35 E. Wacker Drive, Suite 1600 Chicago IL, 60601 United States	Electronic Service		No	M-25- 142
192	Pouya	Najmaie	najm0001@gmail.com	Cooperative Energy Futures		3416 16th Ave S Minneapolis MN, 55407 United States	Electronic Service		No	M-25- 142
193	Alex	Nelson	anelson@dakotaelectric.com	Dakota Electric Association		4300 220nd St Farmington MN, 55024 United States	Electronic Service		No	M-25- 142
194	Anthony	Nelson	amnelson@otpc.com	Ottertail Power		53233 Sunrise Ln Park Rapids MN, 56470 United States	Electronic Service		No	M-25- 142
195	Ben	Nelson	benn@cmpasgroup.org	CMMPA		459 South Grove Street Blue Earth MN, 56013 United States	Electronic Service		No	M-25- 142
196	Carl	Nelson	cnelson@mncee.org	Center for Energy and Environment		212 3rd Ave N Ste 560 Minneapolis MN, 55401 United States	Electronic Service		No	M-25- 142
197	Darin	Nelson	dnelson@minnetonkamn.gov	City of Minnetonka		14600 Minnetonka Blvd Minnetonka MN, 55345 United States	Electronic Service		No	M-25- 142
198	David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency		220 South Sixth Street Suite 1300 Minneapolis MN, 55402 United States	Electronic Service		No	M-25- 142
199	Sephra	Ninow	sephra.ninow@energycenter.org	Center for Sustainable Energy		426 17th Street, Suite 700 Oakland CA, 94612 United States	Electronic Service		No	M-25- 142
200	Michael	Noble	noble@fresh-energy.org	Fresh Energy		408 Saint Peter St Ste 350 Saint Paul MN, 55102 United States	Electronic Service		No	M-25- 142

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
201	Rolf	Nordstrom	rnordstrom@gpisd.net	Great Plains Institute		2801 21ST AVE S STE 220 Minneapolis MN, 55407-1229 United States	Electronic Service		No	M-25-142
202	Samantha	Norris	samanthanorris@alliantenergy.com	Interstate Power and Light Company		200 1st Street SE PO Box 351 Cedar Rapids IA, 52406-0351 United States	Electronic Service		No	M-25-142
203	David	O'Brien	david.obrien@navigant.com	Navigant Consulting		77 South Bedford St Ste 400 Burlington MA, 01803 United States	Electronic Service		No	M-25-142
204	Logan	O'Grady	logrady@mnseia.org	Minnesota Solar Energy Industries Association		2288 University Ave W St. Paul MN, 55114 United States	Electronic Service		No	M-25-142
205	Patty	O'Keefe	patty.okeefe@sierraclub.org			2525 Emerson Ave S Apt 2 Minneapolis MN, 55405 United States	Electronic Service		No	M-25-142
206	Timothy	O'Leary	toleary@llec.coop	Lyon-Lincoln Electric Cooperative, Inc		P.O. Box 639 Tyler MN, 56178-0639 United States	Electronic Service		No	M-25-142
207	Jeff	O'Neill	jeff.oneill@ci.monticello.mn.us	City of Monticello		505 Walnut Street Suite 1 Monticello MN, 55362 United States	Electronic Service		No	M-25-142
208	Matthew	Olsen	molsen@otpc.com	Otter Tail Power Company		215 South Cascade Street Fergus Falls MN, 56537 United States	Electronic Service		No	M-25-142
209	Russell	Olson	rolson@hcpd.com	Heartland Consumers Power District		PO Box 248 Madison SD, 57042-0248 United States	Electronic Service		No	M-25-142
210	Wendi	Olson	wolson@otpc.com	Otter Tail Power Company		215 South Cascade Street Fergus Falls MN, 56537 United States	Electronic Service		No	M-25-142
211	Carol A.	Overland	overland@legalectric.org	Legalelectric - Overland Law Office		1110 West Avenue Red Wing MN, 55066 United States	Electronic Service		No	M-25-142
212	Bethany	Owen	bowen@mnpower.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	M-25-142
213	Cezar	Panait	cezar.panait@state.mn.us		Public Utilities Commission	121 7th Place East Suite 350 St. Paul MN, 55101 United States	Electronic Service		No	M-25-142

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
214	Dan	Patry	dpatry@sunedison.com	SunEdison		600 Clipper Drive Belmont CA, 94002 United States	Electronic Service		No	M-25-142
215	Jeffrey C	Paulson	jeff.jcplaw@comcast.net	Paulson Law Office, Ltd.		4445 W 77th Street Suite 224 Edina MN, 55435 United States	Electronic Service		No	M-25-142
216	Dean	Pawlowski	dpawlowski@otpc.com	Otter Tail Power Company		PO Box 496 215 S. Cascade St. Fergus Falls MN, 56537-0496 United States	Electronic Service		No	M-25-142
217	Susan	Peirce	susan.peirce@state.mn.us		Department of Commerce	85 Seventh Place East St. Paul MN, 55101 United States	Electronic Service		No	M-25-142
218	Mary Beth	Peranteau	mperanteau@fredlaw.com	Fredrikson & Byron, P.A.		44 East Mifflin Street Suite 1000 Madison WI, 53703 United States	Electronic Service		No	M-25-142
219	Jennifer	Peterson	jjpeterson@mnpower.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	M-25-142
220	Wess	Pfaff	wes.pfaff@mrenergy.com			null null, null United States	Electronic Service		No	M-25-142
221	Ryan	Pierce	ryan.m.pierce@xcelenergy.com	Xcel Energy		null null, null United States	Electronic Service		No	M-25-142
222	Morgan	Pitz	morgan.pitz@us-solar.com	US Solar		100 N 6th St #410B Minneapolis MN, 55403 United States	Electronic Service		No	M-25-142
223	Hannah	Polikov	hpolikov@aee.net	Advanced Energy Economy Institute		1000 Vermont Ave, Third Floor Washington DC, 20005 United States	Electronic Service		No	M-25-142
224	Crystal	Pomerleau	crystal.r.pomerleau@xcelenergy.com	Xcel		null null, null United States	Electronic Service		No	M-25-142
225	Kristel	Porter	kristel@mnrenewablenow.org	MN Renewable Now		null null, null United States	Electronic Service		No	M-25-142
226	Paula	Prahl	paula.prahl@dominiuminc.com	Dominium		2905 Northwest Blvd Ste 150 Plymouth MN, 55441 United States	Electronic Service		No	M-25-142
227	Kevin	Pranis	kpranis@liunagroc.com	Laborers' District Council of MN and ND		81 E Little Canada Road St. Paul MN, 55117 United States	Electronic Service		No	M-25-142
228	David G.	Prazak	dprazak@otpc.com	Otter Tail Power Company		P.O. Box 496 215 South Cascade Street Fergus Falls MN, 56538-0496 United States	Electronic Service		No	M-25-142

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
229	Matt	Privratsky	matt@nokomisenergy.com	Nokomis Energy		2639 Nicollet Ave Suite 200 Minneapolis MN, 55408 United States	Electronic Service		No	M-25-142
230	Elizabeth	Psihos	elizabeth.psihos@idealenergies.com			null null, null United States	Electronic Service		No	M-25-142
231	Bridget	Rathsack	bridget.rathsack@burnsvillemn.gov	City of Burnsville, MN		100 Civic Center Parkway Burnsville MN, 55337 United States	Electronic Service		No	M-25-142
232	Peter	Reese	preese@sundialsolarenergy.com	Sundial Energy, LLC		3363 Republic Ave Saint Louis Park MN, 55426 United States	Electronic Service		No	M-25-142
233	Generic Notice	Regulatory	regulatory_filing_coordinators@otpc.com	Otter Tail Power Company		215 S. Cascade Street Fergus Falls MN, 56537 United States	Electronic Service		No	M-25-142
234	John C.	Reinhardt		Laura A. Reinhardt		3552 26th Ave S Minneapolis MN, 55406 United States	Paper Service		No	M-25-142
235	Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	1400 BRM Tower 445 Minnesota St St. Paul MN, 55101-2131 United States	Electronic Service		Yes	M-25-142
236	Kevin	Reuther	kreuther@mncenter.org	MN Center for Environmental Advocacy		26 E Exchange St, Ste 206 St. Paul MN, 55101-1667 United States	Electronic Service		No	M-25-142
237	Micah	Revell	micah.revell@stinson.com	Stinson LLP		50 South Sixth St Ste 2600 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-142
238	Michael	Riewer	mriewer@otpc.com	Otter Tail Power Company		PO Box 4496 Fergus Falls MN, 56538-0496 United States	Electronic Service		No	M-25-142
239	Jonathan	Roberts	jroberts@soltage.com	Soltage		66 York St 5th Floor Jersey City NJ, 07302 United States	Electronic Service		No	M-25-142
240	Noah	Roberts	nroberts@cleanpower.org	Energy Storage Association		1155 15th St NW, Ste 500 Washington DC, 20005 United States	Electronic Service		No	M-25-142
241	Kristi	Robinson	krobinson@star-energy.com	STAR Energy Services, LLC		1401 South Broadway Pelican Rapids MN, 56572 United States	Electronic Service		No	M-25-142
242	Daniel	Rogers	dan@nokomispartners.com			2639 Nicollet Ave Ste 200 Minneapolis MN, 55408 United States	Electronic Service		No	M-25-142

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

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

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

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

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

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

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