414 Nicollet Mall
Minneapolis, MN 55401

September 23, 2024

**—Via Electronic Filing—**

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

RE: SUPPLEMENTAL COMMENTS
IN THE MATTER OF NORTHERN STATES POWER COMPANY D/B/A XCEL ENERGY'S 2023 ANNUAL SAFETY, RELIABILITY, AND SERVICE QUALITY REPORT
DOCKET NO. E002/M-24-27

Dear Mr. Seuffert:

Northern States Power Company, doing business as Xcel Energy, submits these Supplemental Comments in response to the Minnesota Public Utilities Commission's September 13, 2024 Notice of Supplemental Comment Period in the instant docket.

We have electronically filed this document with the Minnesota Public Utilities Commission, and copies have been served on the parties on the attached service list. Please contact Nathan Kostiuk at 612-215-4629 or Nathan.C.Kostiuk@xcelenergy.com or contact me at 612-330-6255 or Nicholas.F.Martin@xcelenergy.com if you have any questions regarding this filing.

Sincerely,

/s/

NICHOLAS MARTIN
DIRECTOR, STRATEGIC OUTREACH AND ADVOCACY

Enclosure
cc: Service List

STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION

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

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| IN THE MATTER OF NORTHERN STATES POWER COMPANY D/B/A XCEL ENERGY'S 2023 ANNUAL SAFETY, RELIABILITY, AND SERVICE QUALITY REPORT | DOCKET NO. E002/M-24-27<br><br>**SUPPLEMENTAL COMMENTS** |

**INTRODUCTION**

Northern States Power Company, doing business as Xcel Energy (Company), submits these Supplemental Comments in response to the Minnesota Public Utilities Commission's September 13, 2024 Notice of Supplemental Comment Period in the instant docket.

**COMMENTS**

## A. RESPONSE TO DEPARTMENT REQUESTS

The Company submits these Supplemental Comments to provide cost updates, where we are able, on information requested by the Department in its Initial Comments. The subsection headings below follow Table 1 of the Department's comments.[1]

### 1. Xcel's improved outreach proposal

As explained in our September 12, 2024 Reply Comments, the Company already conducts outreach to identify customers who have not received assistance and have past due balances, attempts to connect these customers to energy assistance and Company affordability programs, and provides payment options. Our outreach already includes some partnering with community-based organizations (CBOs), for example through implementing partners such as Energy CENTS Coalition and the

[1] Department of Commerce, Initial Comments at Attachment A.

Community Action Partnership agencies, as well as tabling at community events hosted by our CBO partners. For those types of outreach, there are no incremental costs since they are part of the Company's current practice.

The Company has funded some relatively low-cost actions in this area through its Foundation. We are providing larger support to two CBO partners through Community Benefit MOUs associated with the Resilient Minneapolis Project.[2] In addition, we discussed with the Equity Stakeholder Advisory Group (ESAG) ways to expand on our current CBO partnerships, using their community networks to increase participation in both energy efficiency and energy assistance/affordability programs. The costs of expanded CBO partnerships would include staff time to develop those partnerships, which can be significant, and financial resources provided to CBOs for staffing, hosting additional events, disseminating energy program information at their office or community center, or potentially even setting up a staffed office focused on energy affordability, energy efficiency, and energy careers. One concept discussed with ESAG was "Energy Experience Centers," which would potentially be a permanent staffed location(s) in a community center where community members can connect with energy services and workforce opportunities.

We do not attempt to quantify costs here, since those would depend heavily on the design and scope of any future effort. Costs could range from low (e.g., working with a CBO to make energy assistance and Xcel Energy affordability program information available in hard copy at its location or digitally on its website), to medium (e.g., our Customer Care team tabling at additional community events), to potentially quite high (e.g., a permanent staffed Energy Experience Center).

2. **Extreme heat disconnection moratorium and reconnection of disconnected customers**

The Company already suspends disconnections when a National Weather Service excessive heat watch, heat advisory, or excessive heat warning is in effect, so there are no incremental costs for that action.

Regarding reconnection during an extreme heat event, we proposed that we could leverage Advanced Metering Infrastructure (AMI) technology to remotely restore electric service to all disconnected AMI customers for the duration of a heat event issued by the National Weather Service.[3] This capability requires AMI deployment and other technical upgrades. Specifically, once deployment of AMI is finalized and

[2] See *Revised Resilient Minneapolis Project Proposal*, filed March 19, 2024 in Docket No. E002/M-21-694.
[3] Company's Reply Comments at 10.

we work through a new Customer Information System (i.e., billing system), we can build in the capability to complete reconnections during extreme heat events for customers that were disconnected utilizing AMI technology, as proposed in our Reply Comments.[4] The Company does not yet have an estimate of cost, as decisions regarding the new billing system and its design are still being made. Once those decisions have been finalized, the Company will have the information requested.

**3. Unhealthy air quality moratorium and reconnection of disconnected customers**

In Reply Comments, the Company explained that our medical protection program already covers customers who have medical concerns that may be impacted by poor air quality. There are no incremental costs for that action. This program ensures customers who may be sensitive to air quality conditions are protected from disconnection during such events.[5]

Our understanding of the Department's request is an analysis that would go beyond what the Company already does, to consider the costs and benefits of stopping disconnections and reconnecting *all* customers – not only those covered by our current medical protection program – during an Air Quality Event. The Department requests (1) the range of cost estimates for adopting this policy, (2) an estimate of public health benefits, and (3) an estimate of the frequency of unhealthy air quality events for a weather-normalized calendar year.[6]

We are not able to provide such a cost/benefit analysis at this time. Such an analysis is possible, but highly complex and would take significantly more time to develop than the short timeframe between comment rounds in this docket. Air Quality Alerts are issued by the Minnesota Pollution Control Agency (MPCA).[7] As a first step, we would need to obtain data from MPCA on Air Quality Alerts for a range of historic years. However, historic frequency of Air Quality Alerts would not necessarily be a good predictor of future frequency of Air Quality Events, with climate change causing increased wildfires and other events that can lead to poor air quality. There would therefore be significant uncertainty regarding how often the Company would be taking action in future years to stop disconnections and reconnect customers during Air Quality Events. Second, we would need to estimate the cost of stopping disconnections and reconnecting all customers during those events. Third, we would need to arrive at an agreed method of quantifying public health benefits. The

[4] Company's Reply Comments at 10.
[5] Company's Reply Comments at 10-11.
[6] Department Initial Comments at 3.
[7] See Understanding the air quality index (AQI) | Minnesota Pollution Control Agency (state.mn.us).

Commission has approved environmental externality values for some criteria pollutants,[8] providing an estimated societal damage in $/ton of criteria pollutant emitted. It is possible these values, or some intermediate step in their derivation, could be used to estimate the public health benefits of reduced exposure (for example if we assume not being disconnected/ being reconnected would allow customers to stay inside during Air Quality Events who would otherwise be outside or have windows open). However, the externality values are not designed for this purpose, since they are based on air dispersion modeling from general source locations, deposition analysis and the ultimate impact to human health and the environment. In this case the action in question might allow for the continued operation of air conditioning on a hot day, thus reducing exposure to poor air quality, but this exposure according to MPCA is also strongly dependent on temperature, precipitation, wind, and cloud cover at the time of the Air Quality Event.[9] That sort of modeling is quite different from the damage costs modeling conducted for criteria pollutants in the externalities docket.

We believe such an analysis would be extensive, costly, and subject to significant uncertainties both due to the possibility that future frequency of Air Quality Alerts is not similar to historic frequency, and the calculation of public health benefits using externality values that were not designed for this purpose or undertaking another impact analysis specific to this topic. The Company prefers to continue our current policy of protecting from disconnection any customer in our medical protection program who has vulnerability to air quality conditions documented by a medical provider, which may include a nurse practitioner.

### 4. Reduce Xcel's down payment requirements and modify its disconnection to consider individual household circumstances

In Reply Comments the Company proposed an agreement with the Joint Commenters to apply a graduated structure for payment plan down payments, with lower down payments initially and higher down payments if a customer has entered into and broken prior payment plans. This graduated structure would provide customers more flexibility while recognizing that, based on past experience, setting down payments at the minimum level regardless of how many times pay arrangements are broken can have the unintended effect of allowing customers to fall further and further behind.

[8] January 3, 2018 ORDER UPDATING ENVIRONMENTAL COST VALUES. *In the Matter of the Further Investigation into Environmental and Socioeconomic Costs Under Minnesota Statutes Section 216B.2422, Subdivision 3.* Docket No. E-999/CI-14-643.

[9] See Understanding the air quality index (AQI) | Minnesota Pollution Control Agency (state.mn.us).

The current process requests a down payment of 50 percent of the customer's arrears balance. On average, the Company actually receives a down payment of about 26 percent of the customer's arrears balance. This reduction in actual down payments received is indicative of the Company's actions to take into consideration a customer's extenuating circumstances. As noted in Reply Comments, the Company has agreed with the Joint Commenters to accept a 10 percent down payment, if the Commission approves this action.[10]

In reviewing the average of all payment arrangements set in 2022 and 2023 and the same data for 2024 up through August, the Company estimates up to a $1 million annual impact to bad debt due to the proposed reduction in payment plan down payments. Because we do not have a full year of data for 2024 and cannot predict additional arrangements customers may set, this number could potentially be higher than estimated. As we think through the true impact to bad debt as a result of changes in down payment requirements, the Company will look at additional methodologies to calculate this impact. Since this change in arrangement practices will increase bad debt, the Company requests the ability to track bad debt expense increases as it relates to this change.

As for considering individual household circumstances when discussing payment plans with customers, this is already the current Company practice so there would be no incremental cost impact. Those conversations focus on financial, medical or other exigent circumstances that may present difficulties for customers in fulfilling a standard payment arrangement and down payment requirement.[11]

**5. A moratorium on remote disconnections**

The Department mentions two proposals related to remote disconnections:

- Institute a moratorium on remote shutoffs for customers in very low-income census blocks with high concentrations of people of color
- Halt remote disconnections until Xcel has implemented plan to address disparities and demonstrated remote shut-off doesn't increase disparities

We respond jointly to these two proposals since they seem to refer to approximately the same action.

[10] Company's Reply Comments at 11-13.
[11] Company's Reply Comments at 12.

In our Reply Comments, the Company explained why we oppose disconnection moratoria – either overall, or in specific Census Block Groups – for a variety of reasons.[12] Regarding a moratorium on remote disconnections specifically, we view this as substantially the same as the proposals below to eliminate voicemail, since this would require sending an employee prior to any disconnection. We discuss estimated costs in the following section.

### 6. Eliminate voicemail prior to disconnection

The Department mentions two proposals related to the use of voicemail to contact customers:

- Require Xcel to eliminate voicemail as a permissible form of final contact as a condition for extending the Company's variance
- Disallow voicemail as a final means of communication prior to remote disconnection

We respond jointly to these two proposals since they seem to refer to approximately the same action.

Eliminating voicemail as a permissible final form of contact would essentially eliminate the use of remote connection/disconnection via AMI. This would increase three types of cost: staffing, bad debt, and reconnection costs.

Eliminating remote disconnection would increase required staffing levels in order to resume field visits. Staffing would have to be increased significantly to achieve historical levels of disconnections if remote disconnection/reconnection were no longer allowed. Additionally, these costs are calculated based on current rates for labor, travel and other such factors, which will experience inflationary increases over time.

Eliminating remote disconnection would also likely increase bad debt expense, as it would increase the number of customers not paying their past-due balance who are not disconnected due to limited staff resources. We estimate an incremental bad debt expense of around $2 million for 2025. The impact could be greater in 2026 and beyond, after the full deployment of AMI, since fewer non-paying customers would be disconnected.

Finally, this would increase reconnection costs. As discussed in our Reply Comments,

[12] Company's Reply Comments at 7-9.

reconnection fees are currently set at the actual cost of reconnecting a disconnected customer: $50 for manual reading of the meter and reconnection, $13.50 for reconnection of a customer with an AMI meter who was remotely disconnected.[13] Thus, an additional cost of this measure would be that difference in costs of $36.50 per reconnection. In 2023, a total of 24,280 customers were disconnected. If we assume the vast majority of those are ultimately reconnected, the added cost due to eliminating remote disconnection would be $36.50 x 24,280 or $886,220. This would be a recurring annual cost and would increase if more customers are disconnected in a future year and all must be reconnected manually.

### 7. Order Xcel to file payment and disconnection practices and direct Xcel to share practices with customers

This action has no cost other than the staff time required to prepare the compliance filing and make modifications to the payment agreement page of the Company's website.[14]

### 8. Require Xcel to submit compliance filing on Company's current payment agreement and disconnection practices and any modifications

This action has no cost other than the staff time required to prepare the compliance filing.

## B. RESPONSE TO OTHER PARTIES

### 1. Office of the Attorney General – Residential Utilities Division

The Office of the Attorney General – Residential Utilities Division (OAG) in its Reply Comments supports the recommendation of Fresh Energy and the Grid Equity Commenters to order a moratorium on disconnections during the time it takes to complete comprehensive, third-party studies.[15] Fresh Energy estimated that moratorium would last two years – one year to complete the study, another year to design solutions.[16]

The Company opposes both parts of this recommendation. First, as noted in our Reply Comments, the temporary disconnection moratorium during the COVID peacetime emergency lasted approximately 16 months and, while it undoubtedly

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[13] Company's Reply Comments at 14.
[14] Pay Arrangements | Billing & Payment | Xcel Energy.
[15] OAG Reply Comments at 1.
[16] Fresh Energy Initial Comments at 3.

helped some customers in the short term, it also had several negative effects. Notably, it resulted not only in increased costs for all customers, but also in an unsustainable increase in past-due balances for the customers the moratorium was intended to help.[17] A two-year moratorium would presumably have similar or greater effects. Second, the Company sees no reason to delay for as much as two years actions to reduce the identified disparities on which there is already substantial agreement among parties to this docket.

In building its case for a moratorium, OAG notes that "… utilities are required to offer payment arrangements that consider both a customer's financial circumstances, and any extenuating household circumstances, to help customers alleviate arrears. Utilities are also given discretion to forgive arrears for customers dependent on electric service for medically necessary equipment. Customers threatened with disconnection are still entitled to enhanced protections in Minnesota's lengthy cold weather season, and during periods of extreme heat."[18] All of these are measures the Company already takes, as explained in our Reply Comments.

The OAG finds the Company's proposed solutions to address disconnection disparities to be insufficient; however, OAG seems to reduce those solutions to seeking to better connect customers with Low Income Home Energy Assistance Program (LIHEAP) and supporting legislative efforts to supplement LIHEAP funding in the off-season. OAG urges the Company to explore "novel and additional funding solutions to reduce arrearages and help customers avoid disconnection."[19]

As is clear from the record here, we have suggested and support many novel and additional actions beyond connecting customers to LIHEAP and supporting supplemental funding during the LIHEAP off-season, including:

- Across our service territory, continue use of algorithms to identify customers and conduct targeted outreach to prevent disconnection, and continue and expand partnerships with community-based organizations to conduct targeted outreach to prevent disconnection.
- Institute a practice during extreme heat events of using our AMI system to reconnect customers who were previously disconnected remotely (and continue our current practice of no disconnections during extreme heat events).

[17] Company's Reply Comments at 7-9.
[18] OAG Reply Comments at 5.
[19] OAG Reply Comments at 9-11.

- No disconnection until a customer's past due balance reaches $300 (and continue current practice of sending disconnection notice at $180 past due balance).
- Provide disconnection notices at least ten business days prior to disconnection, year-round.
- Reduce payment plan down payments using the graduated structure shown in Table 1 of our Reply Comments. Continue to offer payment agreement terms that are flexible to account for each household's financial circumstances.
- Use $500,000 underperformance penalty to pay down arrears.[20]
- Implement Automatic Bill Credit (ABC) Pilot Program.[21] Include in ABC Pilot evaluation an analysis of impact of bill credits on disconnection rates.
- Enhance energy efficiency program participation in very income-challenged communities, consistent with recommendations from ESAG; continue these discussions with Environmental Justice Accountability Board.

We see no reason to delay these actions while waiting for a study.

## 2. Response to Grid Equity Commenters

The Grid Equity Commenters' (GEC) primary recommendation in Reply Comments is a disconnection moratorium while conducting further study of the costs and benefits of disconnection. To be clear, the Company does not oppose further study in general; we in fact supported a GEC recommendation for periodic re-analysis of disparities to evaluate progress.[22] We do oppose a disconnection moratorium and delaying actions on which there is agreement.

The GEC present data showing significantly greater disconnections in summer 2024 than in the same months in 2022 and 2023, and also comparing the 2024 trend to a longer time period, and suggesting this increase is "correlated to Xcel's ability to remotely disconnect customers."[23] The Company has indicated that disconnections would increase with AMI.[24] Prior to AMI, resource and time constraints meant that

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[20] This action has now been approved by the Commission in its September 19, 2024 hearing in Docket Nos. E,G002/CI-02-2034 and E,G002/M-12-383.

[21] Also supported in Docket No. E002/M-24-173 by Department, OAG, Fresh Energy, Environmental Law & Policy Center, Vote Solar, Center for Energy & Environment, Energy CENTS Coalition, and 27 ESAG members.

[22] Company's Reply Comments at 36. We proposed re-analysis every three years rather than annually, but supported the recommendation in principle.

[23] GEC Reply Comments at 3.

[24] May 20, 2022 *In the Matter of the Petition of Northern States Power Company Requesting Approval of a Variance to Commission Rules Regarding Disconnection of Service*, Docket No. E002/M-22-233, Petition, Attachment A at 10.

the Company was disconnecting only about 6 percent of customers eligible for disconnection. So far in 2024, the Company has disconnected about 16 percent of eligible customers. Customers "eligible for disconnection" are those that the Company has spent nine weeks attempting to contact to set up a payment plan and connect the customer with assistance, to no avail. Again, no customer is disconnected before this nine-week process of attempting to help them avoid disconnection occurs.[25]

If significantly more customers are being disconnected in 2024, this reflects that we are now able to reach more of our customers who are not resolving their payment issues within the nine week lead-up to disconnection. In case some part of this increase is tied to Company processes, the Company has worked with stakeholders to find consensus around a number of changes to those processes: additional community-based organization outreach, a higher disconnection threshold of $300 past due, lower payment plan down payments, a longer notice period prior to disconnection, paying down arrears of the customers with the largest past-due balances, and more visibility into our processes. Our expectation, based on recent experience with the COVID moratorium, is that the set of measures we propose will be a more effective approach to address and mitigate disconnections and customer payment behavior than halting all disconnections. If all the causes of disconnection remain in place, changing the method of disconnection does not actually address the causes; it just means a slightly larger percentage of those non-paying customers eligible to be disconnected will be disconnected. A strategy to reduce disconnections will require a holistic approach, addressing – as the GECs acknowledge – both the proximate causes that are within the Company's and Commission's control, and the root causes that are deeper and largely beyond our control.[26]

Regarding additions to the Interactive Service Quality (ISQ) Map, the GEC support the Company's proposal to provide all data for three historical years on a rolling basis, but archive data for earlier years and make this available on request.[27] We thank the GEC for their support for this proposal, which we think will help make sure the Map remains usable. The GEC believe the proposed process of providing archived data via Information Request is overly burdensome, and request the Company instead provide on the Map page "a description of the available data and the Company's process for archiving it, along with a link to archived data in downloadable spreadsheet format."[28] The Company is willing to work with GEC on this request as we assess its technical feasibility.

[25] Company's Initial Comments at 2-3.
[26] GEC Reply Comments at 6.
[27] GEC Reply Comments at 8.
[28] GEC Reply Comments at 8.

## C. CLARIFICATION ON USE OF UNDERPERFORMANCE PAYMENT

The Company included in our Reply Comments two actions that we view as part of a holistic strategy to reduce disconnection disparities: using $500,000 of the underperformance payment levied in the Quality of Service Plan (QSP) dockets to either pay down arrears of customers with very large past-due balances, or waive reconnection fees. We included those in our Reply Comments also because other parties had raised them in Docket No. E002/M-24-27.

The Commission has now resolved this question separately in its September 19 hearing on Docket Nos. E,G002/CI-02-2034 and E,G002/M-12-383. Per Commission direction, the $500,000 underperformance penalty will be used to apply a $500 credit to the bills of customers who a) have a past-due balance greater than $5,000, b) have not otherwise received energy assistance, c) have made a payment within the last 90 days, and d) live within Census Block Groups (CBGs) with the lowest income. After applying the first three criteria, the Company will rank CBGs from lowest median income to highest and, beginning with the lowest median income CBG, select customers until the $500,000 is exhausted. To the extent that all customers with a past-due balance greater than $5,000 have received a credit and funds remain, the Company will evaluate and propose to stakeholders and the Commission lowering this threshold until 1,000 customers have been identified to receive a credit.

Since this issue has been settled, the Company withdraws these two items[29] from the slate of actions to be decided in Docket No. E002/M-24-27.

## CONCLUSION

The Company appreciates this opportunity to provide additional clarifications in these Supplemental Comments on several of the measures we and others have proposed to address disconnections. We have not been able to provide quantified costs for all proposals, due to the more extensive analysis required for some and the short timeframe between comment rounds in this docket. Nonetheless we believe there are significant areas of agreement among the parties on actions that can be taken to address the identified disparities in disconnections and long outages as expeditiously as possible. We look forward to further discussion with parties and the Commission, and to implementing the approved actions to ensure that our programs and services

[29] Actions I and J on pages 13-14 of the Company's Reply Comments in this docket.

are equitable and effective in helping our customers avoid disconnection and long outages.

Dated: September 23, 2024

Northern States Power Company

## CERTIFICATE OF SERVICE

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

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

xx electronic filing

**DOCKET NO. E002/M-24-27**

Dated this 23rd day of September 2024

/s/

________________________________

Joshua DePauw
Regulatory Administrator

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| David | Niles | david.niles@avantenergy.com | Minnesota Municipal Power Agency | 220 South Sixth Street<br>Suite 1300<br>Minneapolis,<br>MN<br>55402 | Electronic Service | No | OFF_SL_24-27_Official |
| Carol A. | Overland | overland@legalectric.org | Legalectric - Overland Law Office | 1110 West Avenue<br><br>Red Wing,<br>MN<br>55066 | Electronic Service | No | OFF_SL_24-27_Official |
| Generic Notice | Residential Utilities Division | residential.utilities@ag.state.mn.us | Office of the Attorney General-RUD | 1400 BRM Tower<br>445 Minnesota St<br>St. Paul,<br>MN<br>551012131 | Electronic Service | Yes | OFF_SL_24-27_Official |
| Kevin | Reuther | kreuther@mncenter.org | MN Center for Environmental Advocacy | 26 E Exchange St, Ste 206<br><br>St. Paul,<br>MN<br>551011667 | Electronic Service | No | OFF_SL_24-27_Official |
| Christine | Schwartz | Regulatory.records@xcelenergy.com | Xcel Energy | 414 Nicollet Mall FL 7<br><br>Minneapolis,<br>MN<br>554011993 | Electronic Service | Yes | OFF_SL_24-27_Official |
| Will | Seuffert | Will.Seuffert@state.mn.us | Public Utilities Commission | 121 7th Pl E Ste 350<br><br>Saint Paul,<br>MN<br>55101 | Electronic Service | Yes | OFF_SL_24-27_Official |
| George | Shardlow | george@energycents.org | Energy CENTS Coalition | 823 E. 7th Street<br><br>Saint Paul,<br>MN<br>55106 | Electronic Service | No | OFF_SL_24-27_Official |
| Ken | Smith | ken.smith@districtenergy.com | District Energy St. Paul Inc. | 76 W Kellogg Blvd<br><br>St. Paul,<br>MN<br>55102 | Electronic Service | No | OFF_SL_24-27_Official |
| Byron E. | Starns | byron.starns@stinson.com | STINSON LLP | 50 S 6th St Ste 2600<br><br>Minneapolis,<br>MN<br>55402 | Electronic Service | No | OFF_SL_24-27_Official |

| First Name | Last Name | Email | Company Name | Address | Delivery Method | View Trade Secret | Service List Name |
|---|---|---|---|---|---|---|---|
| Lauren | Steinhaeuser | lauren.steinheauser@xcelenergy.com | Northern States Power Company dba Xcel Energy | 414 Nicollet Mall, 401-08<br><br>Minneapolis,<br>MN<br>55401 | Electronic Service | No | OFF_SL_24-27_Official |
| James M | Strommen | jstrommen@kennedy-graven.com | Kennedy & Graven, Chartered | 150 S 5th St Ste 700<br><br>Minneapolis,<br>MN<br>55402 | Electronic Service | No | OFF_SL_24-27_Official |
| Eric | Swanson | eswanson@winthrop.com | Winthrop & Weinstine | 225 S 6th St Ste 3500<br>Capella Tower<br>Minneapolis,<br>MN<br>554024629 | Electronic Service | No | OFF_SL_24-27_Official |
| Carla | Vita | carla.vita@state.mn.us | MN DEED | Great Northern Building<br>12th Floor 180 East Fifth Street<br>St. Paul,<br>MN<br>55101 | Electronic Service | No | OFF_SL_24-27_Official |
| Joseph | Windler | jwindler@winthrop.com | Winthrop & Weinstine | 225 South Sixth Street, Suite 3500<br><br>Minneapolis,<br>MN<br>55402 | Electronic Service | No | OFF_SL_24-27_Official |
| Kurt | Zimmerman | kwz@ibew160.org | Local Union #160, IBEW | 2909 Anthony Ln<br><br>St Anthony Village,<br>MN<br>55418-3238 | Electronic Service | No | OFF_SL_24-27_Official |
| Patrick | Zomer | Pat.Zomer@lawmoss.com | Moss & Barnett PA | 150 S 5th St #1200<br><br>Minneapolis,<br>MN<br>55402 | Electronic Service | No | OFF_SL_24-27_Official |