

July 1, 2025

Will Seuffert 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/CI-24-115

Dear Mr. Seuffert:

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

A Commission Inquiry into Xcel Energy's Advanced Rate Design for Load Management

A notice of comment was filed by the Commission on March 17, 2025.

Party initial comments were filed on June 20, 2025.

The Department provides recommendations on the methodology, content, and goals of a potential residential intra-class cost-causation study and is available to answer any questions the Minnesota Public Utilities Commission may have.

Sincerely,

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

AB/YZ/ad Attachment



Comments of the Minnesota Department of Commerce

Docket No. E002/CI-24-115

I. INTRODUCTION

On March 17, 2025, the Minnesota Public Utilities Commission (Commission) issued a Notice of Comment Period in Docket No. E002/CI-24-115. The Commission invited stakeholder input on whether Northern States Power Company, d/b/a Xcel Energy (Xcel), should grant data access to the Citizens Utility Board of Minnesota and the Chan Lab from the University of Minnesota for the purpose of conducting a residential intra-class cost-causation study under the Open Data Access Standards, and what guidance the Commission should provide regarding the study's scope, evaluation, and timing.

In its initial comments, the Department found that the data request is reasonable and consistent with the Commission's standards and recommended that the Commission allow the study to proceed. The Department further recommended that, if the Commission directs Xcel to conduct a study, the work should begin after full AMI deployment and be filed as a compliance filing in this docket.

In these reply comments, the Department provides further recommendations on the methodology, contents, and goals of the study.

II. PROCEDURAL BACKGROUND

July 5, 2024 The Commission adopted revised Open Data Access Standards (ODAS),

establishing new rules for third-party access to anonymized customer

energy usage data.1

February 13, 2025 CUB and the Chan Lab submitted a letter to the Commission outlining

their proposal to conduct a residential usage profile and cost-causation study using anonymized CEUD. They also submitted a data request to

Xcel Energy under the ODAS framework.²

¹ In the Matter of a Petition by the Citizens Utility Board of Minnesota to Adopt Open Data Access Standards and In the Matter of a Commission Inquiry into Privacy Policies of Rate-Regulated Energy Utilities, Order Refining Open Data Access Standards, July 5, 2024, Docket Nos. E,G-999/M-19-505 and E,G-999/Cl-12-1344, (eDockets) 20247-208049-01, (hereinafter, Open Data Access Standards).

² In the Matter of a Commission Inquiry into Xcel Energy's Advanced Rate Design for Load Management, Citizens Utility Board of Minnesota and the Chan Lab at the University of Minnesota Center for Science, Technology, and Environmental Policy, Letter, February 13, 2025, Docket Nos. E-002/CI-24-115, (eDockets) 20252-215378-01, (hereinafter, CUB and Chan Lab Letter).

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Analyst(s) assigned: Andy Bahn, Yunpei Zhang

March 5, 2025	After Xcel denied the data request, CUB and the Chan Lab filed a formal complaint with the Commission, asserting that Xcel's refusal violated the ODAS and requesting Commission enforcement. ³
March 17, 2025	The Commission issued a Notice of Comment Period seeking input on whether Xcel should grant access to the requested data and what guidance should be provided if a residential cost-causation study is ordered. ⁴
April 16, 2025	Xcel submitted comments opposing the study and defending its decision to deny the data request. ⁵
June 20, 2025	Party initial comments were filed by CUB and the Chan Lab, the Office of the Attorney General – Residential Utilities Division, Fresh Energy, and the Department.

Topic(s) open for comment:

- Should Xcel perform a study evaluating the contribution to Minnesota system costs caused by residential customers with different usage profiles, consulting the Citizen's Utility Board Illinois study as an example?
- What action should the Commission take, if any, regarding the information submitted by the Citizens Utility Board of Minnesota and the Chan Lab at the University of Minnesota in their February 13, 2025 and March 5, 2025 letters related to this matter?
- If the Commission orders such a study, what guidance on the methodology, contents, and goals should it provide?
- If the Commission orders such a study, when should Xcel file it and what process should be used to evaluate it?
- Are there other issues or concerns related to this matter?

The following sections respond to the Commissions third question (If the Commission orders such a study, what guidance on the methodology, contents, and goals should it provide?).

³ In the Matter of a Commission Inquiry into Xcel Energy's Advanced Rate Design for Load Management and In the Matter of a Petition by the Citizens Utility Board of Minnesota to Adopt Open Data Access Standards, Citizens Utility Board of Minnesota and the Chan Lab at the University of Minnesota Center for Science, Technology, and Environmental Policy, Letter, March 5, 2025, Docket Nos. E-002/CI-24-115 and E,G-999/M-19-505, (eDockets) 20253-216091-01, (hereinafter, CUB and Chan Lab Complaint).

⁴ In the Matter of a Commission Inquiry into Xcel Energy's Advanced Rate Design for Load Management, Notice of Comment Period, March 17, 2025, Docket Nos. E-002/CI-24-115, (eDockets) <u>20253-216475-01</u>.

⁵ In the Matter of a Commission Inquiry into Xcel Energy's Advanced Rate Design for Load Management, Xcel Energy, Comments, April 16, 2025, Docket Nos. E-002/CI-24-115, (eDockets) 20254-217758-01, (hereinafter, Xcel Comments).

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III. DEPARTMENT ANALYSIS

A. GUIDANCE ON STUDY GOALS

If Xcel conducts a study similar to the Citizens Utility Board (CUB) Illinois study, the Commission should clearly define the expected outcomes of the study to ensure it can provide valuable information to optimize ratepayer programs. The primary purpose of the study should be to better understand the heterogeneity of residential load shapes and how these different usage profiles relate to residential customer demographics, including income, geography, and other demographic characteristics. As stated in the CUB Illinois study, a more granular understanding of customer load profiles can "help improve energy efficiency, demand response, and time-variant pricing program design. By targeting a particular program at those most likely to benefit from it, utilities can maximize cost-effectiveness and achieve more 'bang for the buck.'"⁶ Further, the CUB Illinois study notes that cross-subsidization and corresponding cost allocation and rate design issues can be explored more fully—particularly through an equity lens.⁷ The Department believes any study conducted by Xcel should similarly present an analysis of AMI data to inform future policy recommendations. Specifically, the goals of an Xcel study should be to explore:

- 1. How to optimize customer enrollment in affordability programs for low-income customers, promoting participation of customers with the highest bills relative to income;
- 2. How to optimize customer enrollment in load flexibility programs and rates (e.g., peak time rebates, demand response, time-of-use rates) based on more granular customer load profiles and locations;
- 3. Development of cluster-based load profiles beyond the average residential class load profile to enable more granular bill impacts analysis for existing and future rates and programs;
- 4. The impacts of residential class cross-subsidization on low-income customers to inform potential rate design and cost allocation approaches that reduce bills for low-income customers, make electrification more affordable for low-income customers, or advance other equity goals; and
- The impacts of electrification for customers with different load profiles and how these impacts may be mitigated through program offerings like managed charging, low-income programs, or rate design.

B. GUIDANCE ON STUDY METHODOLOGY AND CONTENTS

B.1. Cluster approach

In the Illinois CUB study, the authors use the K-means algorithm to identify six primary load shapes for the population of ComEd and Ameren customers. While the authors do not explain why they have

⁶ Zethmayr, Jeff, and Ramandeep Singh Makhija. "Six Unique Load Shapes: A Segmentation Analysis of Illinois Residential Electricity Consumers." The Electricity Journal, vol. 32, no. 9, 2019, p. 1. Elsevier, https://doi.org/10.1016/j.tej.2019.106643.

⁷ Id.

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selected this approach, it appears to be widely used and well validated in the literature. However, one apparent drawback of the K-means algorithm is that it requires the number of clusters to be set in advance of the analysis, rather than having this parameter determined endogenously through the modeling. It is not clear whether the authors' choice of six clusters is optimal.

If Xcel proceeds with the K-means algorithm for determining load shapes, then it should carefully consider the number of clusters used and support its decision for this parameter. Even if Xcel is not able to endogenously determine the number of clusters through its modeling, it should evaluate alternative numbers of clusters for robustness, considering modeling statistics to see whether a greater or fewer number of clusters might be warranted. Xcel should also address the merits of alternative methodologies geared to selecting an optimal number of clusters, such as the "elbow method." 8

Xcel should also consider stratifying its data prior to clustering to gain additional insight into the ways that customer geography and demographics may correlate with differences in usage behavior. This consideration is discussed in further detail in the following section.

B.2. Evaluating cluster demographics and dealing with heterogeneity

The primary goal of the CUB Illinois study is to understand the particular demographic characteristics predominant among individuals with different usage profiles (i.e., in each of the different clusters). To evaluate these demographics, the authors analyze data at the census block group (CBG) level. However, this approach is limited in its cluster-center view—it provides some insight into the characteristics of users within a cluster but does not directly support the evaluation of how residential customers with given demographic characteristics use electricity. The available data is a key limiting factor. It is not possible to identify the demographic characteristics of individual customer accounts. Rather, demographic correlations are identified by matching accounts with CBGs and referencing the demographics of the given CBGs in aggregate. In turn, the publicly available CBG data is at a relatively high degree of aggregation, which further confounds the demographic analysis of customer load shapes.

As a result of both data challenges and methodological choices, the CUB Illinois study authors' conclusions about customer characteristics have limited utility. For example, about the members of Cluster 4, the authors state that they are "both relatively likely to have no high school while also the most likely to hold a post-graduate degree." Describing Cluster 2, the authors explain that it includes customers in areas of the city "with high levels of poverty," along with those residing in "the affluent north side." 10

If Xcel undertakes a similar study, then the Department recommends that it include additional analyses to better understand how different customers use electricity. In other words, we recommend that Xcel

⁸ See Trotta, Gianlucca, et al. Heterogeneity of Electricity Consumption Patterns in Vulnerable Households. *Energies*. September 10, 2020. Available online at: https://www.mdpi.com/1996-1073/13/18/4713.

⁹ IL CUB study, at 5.

¹⁰ *Id*.

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also take a customer-centric perspective in addition to the cluster-centric approach employed by the CUB Illinois study. Xcel should consider first sorting its data by geography so that it can separately evaluate the load shapes of customers in different segments of its service territory. Additionally, Xcel should seek approaches using the available data to better understand the load shapes of vulnerable customers. The IL CUB study authors conducted a parallel analysis with a binary LIHEAP variable to capture the distribution of low-income customers across the different clusters. This approach is valid but limited; Xcel should seek to better understand how low-income customers use electricity, and it should not limit this analysis to only those customers qualifying for assistance programming, which is a very high bar.

Even if only aggregated data at the census block group is available, Xcel could seek to stratify its customer account data by sorting based upon CBG characteristics first; while some CBGs may be demographically mixed, others are likely more uniform in income and education levels, housing features, and other salient demographic features. Thus, for example, Xcel could construct a sample of customers by screening for only those accounts associated with CBGs with high rates of poverty/low incomes and then analyze the load shapes of those customers in isolation. We do not suggest that stratifying first by geography or CBG demographics should replace the population-level approach used by the IL CUB authors. Rather, we recommend that these alternative analytical approaches be used to provide additional context.

Finally, we have some concern about the reliance on Cluster 1 in the IL CUB study as a reference for drawing conclusions about the demographics of other clusters. If Xcel takes an analogous approach, then it should provide further justification for its choice of a cluster to use as the benchmark. Alternatively, Xcel could seek to compare more directly the demographic characteristics of members of each cluster with overall average characteristics across its service territory.

B.3. Analysis of Automatic Bill Credit Pilot approach

As discussed in Xcel Energy's initial comments, the current Notice resulted from the Commission's December 5, 2024, Order in Docket No. E002/M-24-173, in which the Commission approved the Automatic Bill Credit (ABC) Pilot.¹¹ While the Commission did not condition the approval of the ABC pilot on a potential residential intra-class cost-causation study, the study presents an opportunity to investigate the effectiveness of the ABC Pilot structure.

Under the ABC Pilot, Xcel identifies census block groups (CBGs) where both the average electric energy burden is estimated to exceed 4 percent, and also 35 percent of households have an income at or below 185 percent of the Federal Poverty Level. All residential customers in these CBGs are automatically enrolled in the Pilot and receive bill credits to bring the average electric energy burden in each CBG to 4 percent. ¹² The Commission's order approving the ABC Pilot includes a discussion of over-

¹¹ Xcel Energy Comments, at 2-3;

¹² In the Matter of Xcel Energy's Petition for an Automatic Bill Credit Pilot Program, In the Matter of Efforts to Advance Workforce Diversity, Inclusive Participation, and Equitable Access to Utility Services for Xcel Energy, and In the Matter of the

inclusion and under-inclusion, which represent households in qualifying CBGs with lower electric energy burden than 4 percent but still receive a bill credit and households in non-qualifying CBGs with greater electric energy burden than 4 percent but will not receive a bill credit, respectively. Generally, any affordability program should seek to minimize both over-inclusion and under-inclusion. However, there is a tradeoff between these two objectives.

A 2019 working paper from the National Bureau of Economic Research analyzes the over-inclusion (referred to as Type 1 error) and under-inclusion (referred to as Type 2 error) that result from the use of geographical and census data to determine eligibility for energy bill protections. The study shows how each type of error changes based on the threshold used to determine eligibility:¹³

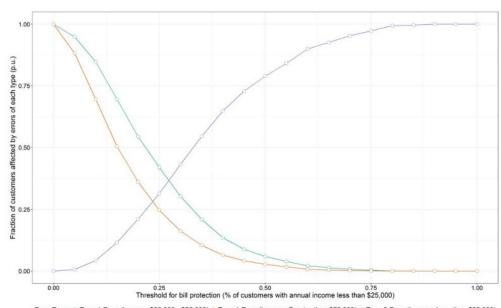


Figure 11: Type 1 and 2 errors in using Census Block Group data to determine bill protections

Error Type: Type 1 Error (Income: \$25,000 - \$75,000) Type 1 Error (Income: Greater than \$75,000) Type 2 Error (Income: Less than \$25,000)

If the Commission directs Xcel to conduct the study, the study should also aim to examine the relationship between over-inclusion and under-inclusion under the ABC Pilot to help determine the appropriate eligibility threshold for the ABC Pilot.

B.4. Rate and Program Design Recommendations

Based on the results of the study, Xcel should provide recommendations for rates, programs, and policies that align with the goals described above in Section III.A, with a focus on low-income

^{2020–2034} Upper Midwest Integrated Resource Plan of Northern States Power Company d/b/a Xcel Energy, Order Approving Automatic Bill Credit Pilot Program as Modified, December 5, 2024, Docket Nos. E002/M-24-173, E-002/M-22-266, and E-002/RP-19-368, (eDockets) 202412-212739-01.

¹³ National Bureau of Economic Research. 2019. The Efficiency and Distributional Effects of Alternative Residential Electricity Rate Designs, Figure 11. https://www.nber.org/system/files/working_papers/w25570/w25570.pdf.

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customers. Like for the ABC Pilot, Xcel should consult with the Equity Stakeholder Advisory Group to develop these recommendations.

IV. DEPARTMENT RECOMMENDATIONS

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

A. GUIDANCE ON STUDY GOALS

- The Department recommends that if Xcel conducts a parallel study, the goals of the study should be:
 - How to optimize customer enrollment in affordability programs for low-income customers, promoting participation of those customers with the highest bills relative to income;
 - How to optimize customer enrollment in load flexibility programs and rates (e.g., peak time rebates, demand response, time-of-use rates) based on more granular customer load profiles and locations;
 - Development of cluster-based load profiles beyond the average residential class load profile to enable more granular bill impacts analysis for existing and future rates and programs;
 - The impacts of residential class cross-subsidization on low-income customers to inform potential rate design and cost allocation approaches that reduce bills for low-income customers, make electrification more affordable for low-income customers, or advance other equity goals; and
 - The impacts of electrification for customers with different load profiles and how these impacts may be mitigated through program offerings like managed charging, low-income programs, or rate design.

B. GUIDANCE ON STUDY METHODOLOGY AND CONTENTS

- B.1. The Department recommends that Xcel evaluate alternative numbers of clusters rather than defaulting to six clusters.
- B.2. The Department recommends that Xcel include additional analysis to better understand how customers with different demographic characteristics, including lowincome customers, use electricity.
- B.3. The Department recommends that Xcel examine the relationship between over-inclusion and under-inclusion of customers under the ABC Pilot.
- B.4. The Department recommends that Xcel develop rate and program design recommendations based on the results of the study, in consultation with the Equity Stakeholder Advisory Group.

CERTIFICATE OF SERVICE

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

Minnesota Department of Commerce Reply Comments

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Dated this 1st day of July 2025

/s/Sharon Ferguson

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62	Carlon	Doyle Fontaine	carlon.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	24- 115Official
63	J.	Drake Hamilton	hamilton@fresh-energy.org	Fresh Energy		408 St Peter St Ste 350 Saint Paul MN, 55101 United States	Electronic Service		No	24- 115Official
64	Michelle	Dreier	mdreier@electricalassociation.com			null null, null United States	Electronic Service		No	24- 115Official
65	Christopher	Droske	christopher.droske@minneapolismn.gov	Northern States Power Company dba Xcel Energy-Elec		661 5th Ave N Minneapolis MN, 55405 United States	Electronic Service		No	24- 115Official
66	Brian	Edstrom	briane@cubminnesota.org	Citizens Utility Board of Minnesota		Minnesota St Ste W1360 Saint Paul MN, 55101 United States	Electronic Service		No	24- 115Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
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68	Kristen	Eide Tollefson	healingsystems69@gmail.com	R-CURE		28477 N Lake Ave Frontenac MN, 55026- 1044 United States	Electronic Service		No	24- 115Official
69	Rebecca	Eilers	rebecca.d.eilers@xcelenergy.com	Xcel Energy		414 Nicollet Mall - 401 7th Floor Minneapolis MN, 55401 United States	Electronic Service		No	24- 115Official
70	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	24- 115Official
71	Ron	Elwood	relwood@mnlsap.org	Legal Services Advocacy Project		970 Raymond Avenue Suite G-40 Saint Paul MN, 55114 United States	Electronic Service		No	24- 115Official
72	Betsy	Engelking	betsy@nationalgridrenewables.com	National Grid Renewables		8400 Normandale Lake Blvd Ste 1200 Bloomington MN, 55437 United States	Electronic Service		No	24- 115Official
73	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	24- 115Official
74	Eric	Fehlhaber	efehlhaber@dakotaelectric.com	Dakota Electric Association		4300 220th St W Farmington MN, 55024 United States	Electronic Service		No	24- 115Official
75	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	24- 115Official
76	Mike	Fiterman	mikefiterman@libertydiversified.com	Liberty Diversified International		5600 N Highway 169 Minneapolis MN, 55428- 3096 United States	Electronic Service		No	24- 115Official
77	David A.	Fitzgerald	daf@dvclaw.com	Davison Van Cleve		2321 Fairview Ave E #3 Seattle WA, 98102 United States	Electronic Service		No	24- 115Official
78	Lucas	Franco	lfranco@liunagroc.com	LIUNA		81 Little Canada Rd E Little Canada MN, 55117 United States	Electronic Service		No	24- 115Official
79	Nathan	Franzen	nathan@nationalgridrenewables.com	Geronimo Energy, LLC		8400 Normandale Lake Blvd Ste 1200 Bloomington	Electronic Service		No	24- 115Official

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80	Daryll	Fuentes	energy@usg.com	USG Corporation		550 W Adams St Chicago IL, 60661 United States	Electronic Service		No	24- 115Official
81	James	Garness	james.r.garness@xcelenergy.com			null null, null United States	Electronic Service		No	24- 115Official
82	Patti	Gartland	pgartland@greaterstcloud.com	Greater St. Cloud Development Corp.		501 West St Germain St Ste 100 St. Cloud MN, 56301 United States	Electronic Service		No	24- 115Official
83	Edward	Garvey	garveyed@aol.com	Residence		32 Lawton St Saint Paul MN, 55102 United States	Electronic Service		No	24- 115Official
84	Allen	Gleckner	gleckner@fresh-energy.org	Fresh Energy		408 St. Peter Street Ste 350 Saint Paul MN, 55102 United States	Electronic Service		No	24- 115Official
85	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	24- 115Official
86	Jenny	Glumack	jenny@mrea.org	Minnesota Rural Electric Association		11640 73rd Ave N Maple Grove MN, 55369 United States	Electronic Service		No	24- 115Official
87	Anita	Grace	anita@gracemulticultural.com	GRACE Multicltural		12959 196th LN NW Elk River MN, 55330 United States	Electronic Service		No	24- 115Official
88	Ryan	Granholm	ryan.granholm@afslaw.com	ArentFox Schiff LLP		233 S Wacker Dr. Ste. 7100 Chicago IL, 60647 United States	Electronic Service		No	24- 115Official
89	Todd J.	Guerrero	todd.guerrero@kutakrock.com	Kutak Rock LLP		Suite 1750 220 South Sixth Street Minneapolis MN, 55402- 1425 United States	Electronic Service		No	24- 115Official
90	Natalie	Haberman	townsend@fresh-energy.org	Fresh Energy		408 St Peter St # 350 St. Paul MN, 55102 United States	Electronic Service		No	24- 115Official
91	Joe	Halso	joe.halso@sierraclub.org	Sierra Club		1536 Wynkoop St Ste 200 Denver CO, 80202 United States	Electronic Service		No	24- 115Official
92	Katherine	Hamilton	katherine@aem-alliance.org	Advanced Energy Management Alliance		1701 Rhode Island Ave, NW Washington DC, 20036 United States	Electronic Service		No	24- 115Official
93	Jason G.	Harp	jason.harp@afslaw.com	ArentFox Schiff LLP		233 S Wacker Dr Ste 7100 Chicago IL,	Electronic Service		No	24- 115Official

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						United States				
94	Matthew B	Harris	matt.b.harris@xcelenergy.com	XCEL ENERGY		401 Nicollet Mall FL 8 Minneapolis MN, 55401 United States	Electronic Service		No	24- 115Official
95	Shubha	Harris	shubha.m.harris@xcelenergy.com	Xcel Energy		414 Nicollet Mall, 401 - FL 8 Minneapolis MN, 55401 United States	Electronic Service		No	24- 115Official
96	Erik	Hatlestad	erik@cureriver.org			117 1st St Montevideo MN, 56265 United States	Electronic Service		No	24- 115Official
97	Kim	Havey	kim.havey@minneapolismn.gov	City of Minneapolis		350 South 5th Street, Suite 315M Minneapolis MN, 55415 United States	Electronic Service		No	24- 115Official
98	Philip	Hayet	phayet@jkenn.com	J. Kennedy and Associates, Inc.		570 Colonial Park Drive Suite 305 Roswell GA, 30075-3770 United States	Electronic Service		No	24- 115Official
99	Todd	Headlee	theadlee@dvigridsolutions.com	Dominion Voltage, Inc.		701 E. Cary Street Richmond VA, 23219 United States	Electronic Service		No	24- 115Official
100	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	24- 115Official
101	Adam	Heinen	aheinen@dakotaelectric.com	Dakota Electric Association		4300 220th St W Farmington MN, 55024 United States	Electronic Service		No	24- 115Official
102	Annete	Henkel	mui@mnutilityinvestors.org	Minnesota Utility Investors		413 Wacouta Street #230 St.Paul MN, 55101 United States	Electronic Service		No	24- 115Official
103	Jessy	Hennesy	jessy.hennesy@avantenergy.com	Avant Energy		220 S. Sixth St. Ste 1300 Minneapolis MN, 55402 United States	Electronic Service		No	24- 115Official
104	Sandra	Henry	sandra.henry@elevatenp.org	Elevate		322 S Green St Ste 300 Chicago IL, 60607 United States	Electronic Service		No	24- 115Official
105	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		Yes	24- 115Official
106	Corey	Hintz	chintz@dakotaelectric.com	Dakota Electric Association		4300 220th Street Farmington MN, 55024- 9583 United States	Electronic Service		No	24- 115Official
107	Joe	Hoffman	ja.hoffman@smmpa.org	SMMPA		500 First Ave SW Rochester MN, 55902-	Electronic Service		No	24- 115Official

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						3303 United States				
108	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	24- 115Official
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110	Samantha	Houston	shouston@ucsusa.org	Union of Concerned Scientists		1825 K St. NW Ste 800 Washington DC, 20006 United States	Electronic Service		No	24- 115Official
111	Lori	Hoyum	lhoyum@mnpower.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	24- 115Official
112	Jan	Hubbard	jan.hubbard@comcast.net			7730 Mississippi Lane Brooklyn Park MN, 55444 United States	Electronic Service		No	24- 115Official
113	Holmes	Hummel	holmes.hummel@cleanenergyworks.org	Clean Energy Works		925 French St NW Washington DC, 20001 United States	Electronic Service		No	24- 115Official
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115	Casey	Jacobson	cjacobson@bepc.com	Basin Electric Power Cooperative		1717 East Interstate Avenue Bismarck ND, 58501 United States	Electronic Service		No	24- 115Official
116	Travis	Jacobson	travis.jacobson@mdu.com	Great Plains Natural Gas Company		400 N 4th St Bismarck ND, 58501 United States	Electronic Service		No	24- 115Official
117	John S.	Jaffray	jjaffray@jjrpower.com	JJR Power		350 Highway 7 Suite 236 Excelsior MN, 55331 United States	Electronic Service		No	24- 115Official
118	Alan	Jenkins	aj@jenkinsatlaw.com	Jenkins at Law		2950 Yellowtail Ave. Marathon FL, 33050 United States	Electronic Service		No	24- 115Official
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120	Richard	Johnson	rick.johnson@lawmoss.com	Moss & Barnett		150 S. 5th Street Suite 1200 Minneapolis MN, 55402 United States	Electronic Service		No	24- 115Official
121	Sarah	Johnson Phillips	sjphillips@stoel.com	Stoel Rives LLP		33 South Sixth Street Suite 4200 Minneapolis MN, 55402 United States	Electronic Service		No	24- 115Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
122	Nate	Jones	njones@hcpd.com	Heartland Consumers Power		PO Box 248 Madison SD, 57042 United States	Electronic Service		No	24- 115Official
123	Philip	Jones	phil@philjonesconsulting.com	Alliance for Transportation Electrification		1402 3rd Ave Ste 1315 Seattle WA, 98101 United States	Electronic Service		No	24- 115Official
124	Brendan	Jordan	bjordan@gpisd.net	Great Plains Institute & Bioeconomy Coalition of MN		2801 21st Ave S Ste 220 Minneapolis MN, 55407 United States	Electronic Service		No	24- 115Official
125	Bina	Joshi	bina.joshi@afslaw.com	ArentFox Schiff LLP		233 S Wacker Dr Ste 7100 Chicago IL, 60606 United States	Electronic Service		No	24- 115Official
126	Dan	Juhl	in.another.account.info@juhlenergy.com	Juhl Energy Inc.		1502 17th St SE Pipestone MN, 56164 United States	Paper Service		No	24- 115Official
127	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	24- 115Official
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130	Stacey	Karels	skarels@local563.org	Mankato Area Bldg & Construction Trades Council		310 McKinzie St Mankato MN, 56001 United States	Electronic Service		No	24- 115Official
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132	Samuel B.	Ketchum	sketchum@kennedy-graven.com	Kennedy & Graven, Chartered		150 S 5th St Ste 700 Minneapolis MN, 55402 United States	Electronic Service		No	24- 115Official
133	Chris	King	chris_king@siemens.com	Siemens		4000 E. Third Ave Suite 400 Foster City CA, 94404 United States	Electronic Service		No	24- 115Official
134	Frank	Kohlasch	frank.kohlasch@state.mn.us		Minnesota Pollution Control Agency	520 Lafayette Rd N. St. Paul MN, 55155 United States	Electronic Service		No	24- 115Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
135	Brian	Krambeer	bkrambeer@mienergy.coop	MiEnergy Cooperative		PO Box 626 31110 Cooperative Way Rushford MN, 55971 United States	Electronic Service		No	24- 115Official
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137	Michael	Krikava	mkrikava@taftlaw.com	Taft Stettinius & Hollister LLP		2200 IDS Center 80 S 8th St Minneapolis MN, 55402 United States	Electronic Service		No	24- 115Official
138	Nicolle	Kupser	nkupser@greatermngas.com	Greater Minnesota Gas, Inc.		1900 Cardinal Ln PO Box 798 Faribault MN, 55021 United States	Electronic Service		No	24- 115Official
139	Matthew	Lacey	mlacey@grenergy.com	Great River Energy		12300 Elm Creek Boulevard Maple Grove MN, 55369- 4718 United States	Electronic Service		No	24- 115Official
140	Mary	LaGarde	mlagarde@maicnet.org	Minneapolis American Indian Center		1530 E Franklin Ave Minneapolis MN, 55404 United States	Electronic Service		No	24- 115Official
141	Holly	Lahd	holly.lahd@target.com	Target Corporation		33 South 6th St CC-28662 Minneapolis MN, 55402 United States	Electronic Service		No	24- 115Official
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145	Kevin	Lee	klee@bluegreenalliance.org	BlueGreen Alliance		2701 University Ave SE Ste. 209 Minneapolis MN, 55414 United States	Electronic Service		No	24- 115Official
146	Dean	Leischow	dean@sunrisenrg.com	Sunrise Energy Ventures		315 Manitoba Ave Ste 200 Wayzata MN, 55391 United States	Electronic Service		No	24- 115Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
147	Annie	Levenson Falk	annielf@cubminnesota.org	Citizens Utility Board of Minnesota		Minnesota Street, Suite W1360 St. Paul MN, 55101 United States	Electronic Service		No	24- 115Official
148	Ryan	Long	ryan.j.long@xcelenergy.com			414 Nicollet Mall 401 8th Floor Minneapolis MN, 55401 United States	Electronic Service		No	24- 115Official
149	Jason	Loos	jason.loos@centerpointenergy.com	CenterPoint Energy Resources Corp.		505 Nicollet Mall 3rd Floor Minneapolis MN, 55402 United States	Electronic Service		No	24- 115Official
150	Susan	Ludwig	sludwig@mnpower.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	24- 115Official
151	Alice	Madden	alice@communitypowermn.org	Community Power		2720 E 22nd St Minneapolis MN, 55406 United States	Electronic Service		No	24- 115Official
152	Kavita	Maini	kmaini@wi.rr.com	KM Energy Consulting, LLC		961 N Lost Woods Rd Oconomowoc WI, 53066 United States	Electronic Service		No	24- 115Official
153	Emily	Marshall	emarshall@lourismarshall.com	Miller O'Brien Jensen, PA		120 S. 6th Street Suite 2400 Minneapolis MN, 55402 United States	Electronic Service		No	24- 115Official
154	Katherine	Marshall	katie.marshall@lawmoss.com	Moss & Barnett		150 S 5th St Ste 1200 Minneapolis MN, 55402 United States	Electronic Service		No	24- 115Official
155	Mary	Martinka	mary.a.martinka@xcelenergy.com	Xcel Energy Inc		414 Nicollet Mall 7th Floor Minneapolis MN, 55401 United States	Electronic Service		No	24- 115Official
156	Gregg	Mast	gmast@cleanenergyeconomymn.org	Clean Energy Economy Minnesota		4808 10th Avenue S Minneapolis MN, 55417 United States	Electronic Service		No	24- 115Official
157	Daryl	Maxwell	dmaxwell@hydro.mb.ca	Manitoba Hydro		360 Portage Ave FL 16 PO Box 815, Station Main Winnipeg MB, R3C 2P4 Canada	Electronic Service		No	24- 115Official
158	Lilly B.	McKenna	lilly.mckenna@stoel.com	Stoel Rives LLP		One Montgomery St Ste 3230 San Francisco CA, 94104 United States	Electronic Service		No	24- 115Official
159	Taylor	McNair	taylor@gridlab.org			668 Capp Street San Francisco CA, 94110 United States	Electronic Service		No	24- 115Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
160	Sally Anne	McShane	sally.anne.mcshane@state.mn.us		Public Utilities Commission	121 7th Place E Suite 350 St. Paul MN, 55101 United States	Electronic Service		No	24- 115Official
161	Stephen	Melchionne	stephen.melchionne@ag.state.mn.us		Office of the Attorney General - Department of Commerce	Minnesota Street, Ste. 1400 St. Paul MN, 55101 United States	Electronic Service		Yes	24- 115Official
162	Thomas	Melone	thomas.melone@allcous.com	Minnesota Go Solar LLC		222 South 9th Street Suite 1600 Minneapolis MN, 55120 United States	Electronic Service		No	24- 115Official
163	Peder	Mewis	pmewis@cleangridalliance.org	Clean Grid Alliance		570 Asbury St. St. Paul MN, 55104 United States	Electronic Service		No	24- 115Official
164	Joseph	Meyer	joseph.meyer@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	Bremer Tower, Suite 1400 445 Minnesota Street St Paul MN, 55101-2131 United States	Electronic Service		No	24- 115Official
165	Kevin	Miller	kevin.miller@chargepoint.com			254 E. Hacienda Avenue Campbell CA, 95008 United States	Electronic Service		No	24- 115Official
166	Stacy	Miller	stacy.miller@minneapolismn.gov	City of Minneapolis		350 S. 5th Street Room M 301 Minneapolis MN, 55415 United States	Electronic Service		No	24- 115Official
167	David	Moeller	dmoeller@allete.com	Minnesota Power			Electronic Service		No	24- 115Official
168	Marc	Monbouquette	marc.monbouquette@enel.com	Enel X North America, Inc.		846 Bransten Rd San Carlos CA, 94070 United States	Electronic Service		No	24- 115Official
169	Dalene	Monsebroten	dalene.monsebroten@nmpagency.com	Northern Municipal Power Agency		123 2nd St W Thief River Falls MN, 56701 United States	Electronic Service		No	24- 115Official
170	Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP		33 South Sixth St Ste 4200 Minneapolis MN, 55402 United States	Electronic Service		No	24- 115Official
171	Evan	Mulholland	emulholland@mncenter.org	Minnesota Center for Environmental Advocacy		1919 University Ave W Ste 515 Saint Paul MN, 55101 United States	Electronic Service		No	24- 115Official
172	Alan	Muller	alan@greendel.org	Energy & Environmental Consulting		1110 West Avenue Red Wing MN, 55066 United States	Electronic Service		No	24- 115Official
173	Kristin	Munsch	kmunsch@citizensutilityboard.org	Citizens Utility Board of Minnesota		309 W. Washington St. Ste. 800	Electronic Service		No	24- 115Official

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						Chicago IL, 60606 United States				
174	Travis	Murray	travis.murray@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	445 Minnesota St Ste 1400 Saint Paul MN, 55101 United States	Electronic Service		Yes	24- 115Official
175	Amanda	Myers	amanda@weavegrid.com	Weave Grid, Inc.		222 7th Street 2nd Floor San Francisco CA, 94103 United States	Electronic Service		No	24- 115Official
176	Mark	Nabong	mnabong@nrdc.org	Natural Resources Defense Council		20 N. Wacker Drive #1600 Chicago IL, 60606 United States	Electronic Service		No	24- 115Official
177	Ben	Nelson	benn@cmpasgroup.org	СММРА		459 South Grove Street Blue Earth MN, 56013 United States	Electronic Service		No	24- 115Official
178	Carl	Nelson	cnelson@mncee.org	Center for Energy and Environment		212 3rd Ave N Ste 560 Minneapolis MN, 55401 United States	Electronic Service		No	24- 115Official
179	David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency		220 South Sixth Street Suite 1300 Minneapolis MN, 55402 United States	Electronic Service		No	24- 115Official
180	Sephra	Ninow	sephra.ninow@energycenter.org	Center for Sustainable Energy		426 17th Street, Suite 700 Oakland CA, 94612 United States	Electronic Service		No	24- 115Official
181	Michael	Noble	noble@fresh-energy.org	Fresh Energy		408 Saint Peter St Ste 350 Saint Paul MN, 55102 United States	Electronic Service		No	24- 115Official
182	Rolf	Nordstrom	rnordstrom@gpisd.net	Great Plains Institute		2801 21ST AVE S STE 220 Minneapolis MN, 55407- 1229 United States	Electronic Service		No	24- 115Official
183	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	24- 115Official
184	Christian	Noyce	christian.noyce@state.mn.us		Public Utilities Commission	759 Hague Ave St Paul MN, 55104 United States	Electronic Service		No	24- 115Official
185	David	O'Brien	david.obrien@navigant.com	Navigant Consulting		77 South Bedford St Ste 400 Burlington MA, 01803 United States	Electronic Service		No	24- 115Official
186	M. William	O'Brien	bobrien@mojlaw.com	Miller O'Brien Jensen, P.A.		120 S 6th St Ste 2400 Minneapolis MN, 55402 United States	Electronic Service		No	24- 115Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
187	Ric	O'Connell	ric@gridlab.org	GridLab		2120 University Ave Berkeley CA, 94704 United States	Electronic Service		No	24- 115Official
188	Jeff	O'Neill	jeff.oneill@ci.monticello.mn.us	City of Monticello		505 Walnut Street Suite 1 Monticelllo MN, 55362 United States	Electronic Service		No	24- 115Official
189	Matthew	Olsen	molsen@otpco.com	Otter Tail Power Company		215 South Cascade Street Fergus Falls MN, 56537 United States	Electronic Service		No	24- 115Official
190	Russell	Olson	rolson@hcpd.com	Heartland Consumers Power District		PO Box 248 Madison SD, 57042-0248 United States	Electronic Service		No	24- 115Official
191	Debra	Opatz	dopatz@otpco.com	Otter Tail Power Company		215 South Cascade Street Fergus Falls MN, 56537 United States	Electronic Service		No	24- 115Official
192	Nate	OReilly	nate@iron512.com			851 Pierce Butler Route St Paul MN, 55104 United States	Electronic Service		No	24- 115Official
193	Carol A.	Overland	overland@legalectric.org	Legalectric - Overland Law Office		1110 West Avenue Red Wing MN, 55066 United States	Electronic Service		No	24- 115Official
194	John	Pacheco	johnpachecojr@gmail.com			null null, null United States	Electronic Service		No	24- 115Official
195	Greg	Palmer	gpalmer@greatermngas.com	Greater Minnesota Gas, Inc.		1900 Cardinal Ln PO Box 798 Faribault MN, 55021 United States	Electronic Service		No	24- 115Official
196	Jessica	Palmer Denig	jessica.palmer-denig@state.mn.us		Office of Administrative Hearings	600 Robert St N PO Box 64620 St. Paul MN, 55164 United States	Electronic Service		No	24- 115Official
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198	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	24- 115Official
199	Jose	Perez	jose@hispanicsinenergy.com			1017 L Street #719 Sacramento CA, 95814 United States	Electronic Service		No	24- 115Official
200	Jennifer	Peterson	jjpeterson@mnpower.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	24- 115Official
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#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
				Resources		Milwaukee WI, 53203 United States				
202	Marcia	Podratz	mpodratz@mnpower.com	Minnesota Power		30 W Superior S Duluth MN, 55802 United States	Electronic Service		No	24- 115Official
203	Hannah	Polikov	hpolikov@aee.net	Advanced Energy Economy Institute		1000 Vermont Ave, Third Floor Washington DC, 20005 United States	Electronic Service		No	24- 115Official
204	J.	Porter	greg.porter@nngco.com	Northern Natural Gas Company		1111 South 103rd St Omaha NE, 68124 United States	Electronic Service		No	24- 115Official
205	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	24- 115Official
206	David G.	Prazak	dprazak@otpco.com	Otter Tail Power Company		P.O. Box 496 215 South Cascade Street Fergus Falls MN, 56538- 0496 United States	Electronic Service		No	24- 115Official
207	Kenneth	Rance	krance@sabathani.org	Sabathani Community Center		310 East 38th St Rm #120 Minneapolis MN, 55409 United States	Electronic Service		No	24- 115Official
208	John C.	Reinhardt		Laura A. Reinhardt		3552 26th Ave S Minneapolis MN, 55406 United States	Paper Service		No	24- 115Official
209	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	24- 115Official
210	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	24- 115Official
211	John	Reynolds	john.reynolds@nfib.org			180 5th St E Suite 260 St. Paul MN, 55101 United States	Electronic Service		No	24- 115Official
212	Whitney	Richardson	whitney.richardson@evgo.com	EVgo Services, LLC		11835 W Olympic Blvd Ste 900E Los Angeles CA, 90064 United States	Electronic Service		No	24- 115Official
213	Noah	Roberts	nroberts@cleanpower.org	Energy Storage Association		1155 15th St NW, Ste 500 Washington DC, 20005 United States	Electronic Service		No	24- 115Official
214	Alice	RobertsDavis	admin.info@state.mn.us	Department of Administration		15 Sherburne Avenue St. Paul MN, 55155 United States	Electronic Service		No	24- 115Official

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215	Susan	Romans	sromans@allete.com	Minnesota Power		30 West Superior Street Legal Dept Duulth MN, 55802 United States	Electronic Service		No	24- 115Official
216	Amanda	Rome	amanda.rome@xcelenergy.com	Xcel Energy		414 Nicollet Mall FL 5 Minneapoli MN, 55401 United States	Electronic Service		No	24- 115Official
217	Robert K.	Sahr	bsahr@eastriver.coop	East River Electric Power Cooperative		P.O. Box 227 Madison SD, 57042 United States	Electronic Service		No	24- 115Official
218	Renee	Samson	rsamson@freewiretech.com	FreeWire Technologies		1999 Harrison St Oakland CA, 94612 United States	Electronic Service		No	24- 115Official
219	Joseph L	Sathe	jsathe@kennedy-graven.com	Kennedy & Graven, Chartered		150 S 5th St Ste 700 Minneapolis MN, 55402 United States	Electronic Service		No	24- 115Official
220	Tim	Schaefer	thschaef@gmail.com	Environment MN		211 N 1st St Ste 480 Minneapolis MN, 55401 United States	Electronic Service		No	24- 115Official
221	Kevin	Schlangen	kevin.schlangen@co.dakota.mn.us	Dakota County		2800 160th Street West Rosemount MN, 55068 United States	Electronic Service		No	24- 115Official
222	Jacob J.	Schlesinger	jschlesinger@keyesfox.com	Keyes & Fox LLP		1580 Lincoln St Ste 880 Denver CO, 80203 United States	Electronic Service		No	24- 115Official
223	Elizabeth	Schmiesing	eschmiesing@winthrop.com	Winthrop & Weinstine, P.A.		225 South Sixth Street Suite 3500 Minneapolis MN, 55402 United States	Electronic Service		No	24- 115Official
224	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		Yes	24- 115Official
225	Kay	Schraeder	kschraeder@minnkota.com	Minnkota Power		5301 32nd Ave S Grand Forks ND, 58201 United States	Electronic Service		No	24- 115Official
226	Lori	Schultz	lorischultz@minncap.org	Minnesota Community Action Partnership		MCIT Building 100 Empire Dr Ste 202 St. Paul MN, 55103 United States	Electronic Service		No	24- 115Official
227	Christine	Schwartz	regulatory.records@xcelenergy.com	Xcel Energy		414 Nicollet Mall, MN1180-07- MCA Minneapolis MN, 55401- 1993 United States	Electronic Service		No	24- 115Official

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228	Doug	Scott	dscott@gpisd.net	Great Plains Institute		2801 21st Ave Ste 220 Minneapolis MN, 55407 United States	Electronic Service		No	24- 115Official
229	Dean	Sedgwick	sedgwick@itascapower.com	Itasca Power Company		PO Box 455 Spring Lake MN, 56680 United States	Electronic Service		No	24- 115Official
230	Maria	Seidler	maria.seidler@dom.com	Dominion Energy Technology		120 Tredegar Street Richmond VA, 23219 United States	Electronic Service		No	24- 115Official
231	Will	Seuffert	will.seuffert@state.mn.us		Public Utilities Commission	121 7th PI E Ste 350 Saint Paul MN, 55101 United States	Electronic Service		Yes	24- 115Official
232	Timothy	Sexton	timothy.sexton@state.mn.us		Minnesota Department of Transportation		Electronic Service		No	24- 115Official
233	Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates		7400 Lyndale Ave S Ste 190 Richfield MN, 55423 United States	Electronic Service		No	24- 115Official
234	Patricia	Sharkey	psharkey@environmentallawcounsel.com	Midwest Cogeneration Association.		180 N LaSalle St Ste 3700 Chicago IL, 60601 United States	Electronic Service		No	24- 115Official
235	Bria	Shea	bria.e.shea@xcelenergy.com	Xcel Energy		414 Nicollet Mall Minneapolis MN, 55401 United States	Electronic Service		No	24- 115Official
236	Doug	Shoemaker	dougs@charter.net	Minnesota Renewable Energy		2928 5th Ave S Minneapolis MN, 55408 United States	Electronic Service		No	24- 115Official
237	Anne	Smart	anne.smart@chargepoint.com	ChargePoint, Inc.		254 E Hacienda Ave Campbell CA, 95008 United States	Electronic Service		No	24- 115Official
238	Amanda	Smith	amanda.smith@state.mn.us		Minnesota Pollution Control Agency	520 Lafayette Rd N St. Paul MN, 55155 United States	Electronic Service		No	24- 115Official
239	Beth	Smith	bsmith@greatermankato.com	Greater Mankato Growth		1961 Premier Dr Ste 100 Mankato MN, 56001 United States	Electronic Service		No	24- 115Official
240	Joshua	Smith	joshua.smith@sierraclub.org			85 Second St FL 2 San Francisco CA, 94105 United States	Electronic Service		No	24- 115Official
241	Ken	Smith	ken.smith@ever-greenenergy.com	Ever Green Energy		305 Saint Peter St Saint Paul MN, 55102 United States	Electronic Service		No	24- 115Official
242	Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.		76 W Kellogg Blvd St. Paul MN, 55102 United States	Electronic Service		No	24- 115Official

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243	Trevor	Smith	trevor.smith@avantenergy.com	Avant Energy, Inc.		220 South Sixth Street Suite 1300 Minneapolis MN, 55402 United States	Electronic Service		No	24- 115Official
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245	Anna	Sommer	asommer@energyfuturesgroup.com	Energy Futures Group		PO Box 692 Canton NY, 13617 United States	Electronic Service		No	24- 115Official
246	Peggy	Sorum	peggy.sorum@centerpointenergy.com	CenterPoint Energy		505 Nicollet Mall Minneapolis MN, 55402 United States	Electronic Service		No	24- 115Official
247	Mark	Spurr	mspurr@fvbenergy.com	International District Energy Association		222 South Ninth St., Suite 825 Minneapolis MN, 55402 United States	Electronic Service		No	24- 115Official
248	Sky	Stanfield	stanfield@smwlaw.com	Shute, Mihaly & Weinberger		396 Hayes Street San Francisco CA, 94102 United States	Electronic Service		No	24- 115Official
249	Jamez	Staples	jstaples@renewablenrgpartners.com	Renewable Energy Partners		3033 Excelsior Blvd S Minneapolis MN, 55416 United States	Electronic Service		No	24- 115Official
250	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	24- 115Official
251	Byron E.	Starns	byron.starns@stinson.com	STINSON LLP		50 S 6th St Ste 2600 Minneapolis MN, 55402 United States	Electronic Service		No	24- 115Official
252	Richard	Stasik	richard.stasik@wecenergygroup.com	Minnesota Energy Resources Corporation (HOLDING)		231 West Michigan St - P321 Milwaukee WI, 53203 United States	Electronic Service		No	24- 115Official
253	Kristin	Stastny	kstastny@taftlaw.com	Taft Stettinius & Hollister LLP		2200 IDS Center 80 South 8th Street Minneapolis MN, 55402 United States	Electronic Service		No	24- 115Official
254	Lindsey	Stegall	lindsey.stegall@evgo.com	EVgo Services, LLC		11835 W Olympic Blvd Ste 900E Los Angeles CA, 90064 United States	Electronic Service		No	24- 115Official
255	Cary	Stephenson	cstephenson@otpco.com	Otter Tail Power Company		215 South Cascade Street Fergus Falls MN, 56537 United States	Electronic Service		No	24- 115Official

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256	James M	Strommen	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered		150 S 5th St Ste 700 Minneapolis MN, 55402 United States	Electronic Service		No	24- 115Official
257	Dean	Taylor	dtaylor@pluginamerica.org	Plug In America		6380 Wilshire Blvd, Suite 1000 Los Angeles CA, 90048 United States	Electronic Service		No	24- 115Official
258	Hanna	Terwilliger	hanna.terwilliger@state.mn.us		Public Utilities Commission	121 East 7th Place, Suite 350 Saint Paul MN, 55101 United States	Electronic Service		No	24- 115Official
259	Stuart	Tommerdahl	stommerdahl@otpco.com	Otter Tail Power Company		215 S Cascade St PO Box 496 Fergus Falls MN, 56537 United States	Electronic Service		No	24- 115Official
260	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	24- 115Official
261	Pat	Treseler	pat.jcplaw@comcast.net	Paulson Law Office LTD		4445 W 77th Street Suite 224 Edina MN, 55435 United States	Electronic Service		No	24- 115Official
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263	Nikhil	Vijaykar	nvijaykar@keyesfox.com	Keyes & Fox LLP		580 California St 12th Floor San Francisco CA, 94104 United States	Electronic Service		No	24- 115Official
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265	Julie	Voeck	julie.voeck@nee.com	NextEra Energy Resources, LLC		700 Universe Blvd Juno Beach FL, 33408 United States	Electronic Service		No	24- 115Official
266	Amelia	Vohs	avohs@mncenter.org	Minnesota Center for Environmental Advocacy		1919 University Avenue West Suite 515 St. Paul MN, 55104 United States	Electronic Service		No	24- 115Official
267	Curt	Volkmann	curt@newenergy-advisors.com	Fresh Energy		408 St Peter St Saint Paul MN, 55102 United States	Electronic Service		No	24- 115Official
268	Dwight	Wagenius	dwagenius@gmail.com	Minnesota Interfaith Power & Light		4407 E Lake St Minneapolis MN, 55406 United States	Electronic Service		No	24- 115Official

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271	Jenna	Warmuth	jwarmuth@mnpower.com	Minnesota Power		30 W Superior St Duluth MN, 55802-2093 United States	Electronic Service		No	24- 115Official
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275	Joseph	Windler	jwindler@winthrop.com	Winthrop & Weinstine		225 South Sixth Street, Suite 3500 Minneapolis MN, 55402 United States	Electronic Service		No	24- 115Official
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278	Alicia	Zaloga	azaloga@keyesfox.com	Keyes & Fox, LLP		1155 Kildaire Farm Rd Ste 202-203 Cary NC, 27511 United States	Electronic Service		No	24- 115Official
279	Christopher	Zibart	czibart@atcllc.com	American Transmission Company LLC		W234 N2000 Ridgeview Pkwy Court Waukesha WI, 53188- 1022 United States	Electronic Service		No	24- 115Official
280	Kurt	Zimmerman	kwz@ibew160.org	Local Union #160, IBEW		2909 Anthony Ln St Anthony Village MN, 55418-3238 United States	Electronic Service		No	24- 115Official
281	Patrick	Zomer	pat.zomer@lawmoss.com	Moss & Barnett PA		150 S 5th St #1200 Minneapolis MN, 55402 United States	Electronic Service		No	24- 115Official