

BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

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

Chair
Commissioner
Commissioner
Commissioner
Commissioner

In the Matter of Xcel Energy’s Petition for
Approval of its 2023 Annual Fuel Forecast
and Monthly Fuel Cost Charges

ISSUE DATE: November 15, 2024

DOCKET NO. E-002/AA-22-179

ORDER APPROVING 2023 FUEL-
CLAUSE TRUE-UP REPORT,
REQUIRING ADDITIONAL FILINGS,
FINDING IMPRUDENCE, AND
NOTICE OF AND ORDER FOR
HEARING

PROCEDURAL HISTORY

On March 1, 2024, Northern States Power Company, d/b/a Xcel Energy (Xcel or the Company) filed its Annual Fuel Clause True-Up and Compliance Report for fuel forecast and fuel-cost charges approved for the 2023 calendar year, which also included information to comply with the requirements for annual automatic adjustment of charges reports.

On April 15, 2024, the Department of Commerce, Division of Energy Resources (the Department) filed comments.

On May 1, 2024, Xcel filed reply comments.

On May 15, 2024, the Department filed supplemental comments and the Minnesota Office of the Attorney General—Residential Utilities Division (OAG) filed comments.

By June 18, 2024, five members of the public had filed comments.

On July 30, 2024, and the Citizens Utility Board of Minnesota (CUB) filed reply comments and Xcel filed supplemental reply comments.

On August 23, 2024, the Department filed comments responding to Xcel’s July 30, 2024 filing.

On September 19, 2024, the Commission met to consider this matter.

FINDINGS AND CONCLUSIONS

I. Summary of Commission Action

In this order, the Commission approves the undisputed portions of Xcel's Annual Fuel-Clause True-Up Report for 2023. However, an unplanned outage at the Prairie Island Nuclear Generating Plant (PINGP) in October 2023, occurred when workers unintentionally struck and damaged an underground cable while excavating for an unrelated project. As a result, Xcel incurred significant costs for replacement energy during this outage. The Commission concludes that this incident and outage resulted from Xcel's imprudence, and it is not appropriate for the Company to recover all of its claimed outage-related fuel costs. However, the appropriate refund amount is disputed, and the Commission will refer this issue to the Office of Administrative Hearings for a contested case proceeding to develop the record on what amount is due to customers because of Xcel's lack of prudence.

II. Undisputed Issues

A. Overview

Xcel provided a comparison of the approved 2023 fuel forecast to 2023 actual costs, noting that its actual fuel expense was \$935.3 million—\$133.9 million lower than the approved forecast of \$1,069.2 million.

Xcel's average fuel cost of \$33.44 per megawatt-hour (MWh) was 14.2 percent lower than the authorized rate of \$38.96 per MWh. Actual fuel cost collections were \$1,091.8 million due to 1.9 percent higher-than-forecast Minnesota jurisdictional sales. Furthermore, \$30.5 million was refunded to customers from July through September 2023 through a mid-year rate decrease. Therefore, net, total Minnesota fuel collections were \$1,061.3 million versus total actual fuel expense of \$935.3 million, resulting in over-collected fuel costs of \$126.0 million. Xcel proposed to refund this amount to ratepayers.

The Department determined that Xcel's petition complied with the fuel-clause requirements of Minn. R. 7825.2800 through 7825.2840 and recommended approval of the non-nuclear aspects of Xcel's filing; no commenter disputed this recommendation. The Department also recommended requiring additional information in future true-up petitions about planned outages as described in ordering paragraph 4, below. Xcel agreed to comply with this reporting requirement.

B. Commission Action

On the non-nuclear aspects of Xcel's petition, after review of and consideration of the record, the Commission agrees with the Department's evaluation and will, therefore, accept Xcel's 2023 fuel forecast true-up report and approve Xcel's proposed refund of \$126 million to Minnesota ratepayers. The Commission will require Xcel to file the total refund calculation within fourteen days of the date of this order. The Commission will also require Xcel to include additional information about its planned outages in future true-up petitions as recommended by the Department and described in ordering paragraph 4.

III. Disputed Issues

A. PINGP Outage Background

In mid-October of 2023, Xcel began performing work to replace power cables between a substation and PINGP. On October 19, hole-boring contractors struck an underground cable bundle while performing work to replace a different underground cable. This incident caused Unit 1 to shut down.¹ The outage of Unit 1 lasted 103 days.

In a Licensee Event Report (the Report) submitted to the Nuclear Regulatory Commission, Xcel attributed the cable-striking incident to two human errors. The Report noted that the root cause of this human performance issue was weakness in the process for approving the excavation permit as well as inadequate oversight of the supplemental workers performing the excavation work. Xcel identified how its procedures failed to adequately guard against the resulting problem—and specifically, how the failure to use ground-penetrating radar in the area prevented the workers from locating the buried cables.

The Report stated that, due to inadequate oversight, work proceeded without all controls in place that would be expected for work at a nuclear plant. Specifically, approved work plans were not always available at the work site and approved construction drawings for the boring work were not updated when changes were made in the field.

Additionally, Xcel stated that while performing the work, the team conducting horizontal drilling activities for the new cable were inadvertently provided maps that did not fully depict all the other underground cables near the excavation path.

In the Report, Xcel asserted that it has initiated multiple procedure changes to address the identified gaps and prevent recurrence of this event.

During the PINGP outage, Xcel purchased replacement power and ratepayers have borne the resulting costs. Xcel's true-up petition requests approval for the Company to retain these replacement-power costs.

B. Prudence

1. Positions of the Commenters

a. Department, OAG, and CUB

The Department, the OAG, and CUB asserted that Xcel's imprudent actions caused the cable-striking incident and resulting plant outage, so Xcel should not be allowed to recover the costs of replacement power from ratepayers. They argued that Xcel's statements in the Report support finding that Xcel's failures to ensure reasonable precautions and oversight caused the outage that necessitated the purchases of replacement power.

¹ Unit 2 was in a planned outage and not operating when this incident occurred.

They claimed that Xcel's statements show that the Company failed to ensure adequate oversight or use good utility practice in overseeing the drilling activities. Because the outage (and need to buy replacement power) was caused by Xcel's imprudence, they supported disallowing Xcel's recovery of the replacement power costs incurred during the outage at PINGP.

They also faulted Xcel's filing for providing only minimal information about Xcel's role in the PINGP outages. CUB questioned whether Xcel's initial filing provided sufficient information to allow interested parties to adequately scrutinize the additional costs Xcel incurred as a result of the outages at PINGP. According to CUB, this issue exemplifies the potential lack of transparency with the current fuel-clause adjustment (FCA) process for reconciling energy-related costs that a utility incurs with the costs the utility recovers from ratepayers.

b. Xcel

Xcel argued that the record does not show it acted imprudently and asserted that it should be allowed to recover from ratepayers all costs of replacement power purchased during the Prairie Island outages caused by the incident on October 17, 2023.

Xcel stated that the cable damage that caused the unit shutdown was unintentional and occurred during work that was reasonable and necessary to maintain the plant. Xcel asserted that it has operated PINGP prudently to achieve a capacity factor of 95 percent between 2018 and 2022—performance that exceeded the Company's forecasts and provided millions of dollars of benefit to ratepayers. In evaluating prudence, Xcel urged the Commission to consider operational history and industry best practices.

Xcel emphasized that the purpose of the Report is to evaluate the incident with the benefit of hindsight so that the Company can learn from the incident and make any adjustments that may be necessary to avoid a similar occurrence. According to Xcel, relying on admissions that the Company made in a highly self-critical, after-the-fact assessment of the incident to find imprudence would not accurately reflect whether Xcel's actions were reasonable at the time the Company made the decisions alleged to be imprudent. If the Commission found imprudence based on the Report, Xcel noted that it may create incentives for companies to be less self-critical or candid in such filings, which would undermine the purpose of these types of reports.

If the Commission determines that the current record supports any disallowance based on Xcel's imprudence, the Company asserted a right to a contested case proceeding to develop the record more fully.

c. Public Commenters

None of the members of the public who filed comments in this docket supported Xcel's recovery of outage-related costs from ratepayers.

2. Commission Action

Based on its review of the record, the Commission concludes that Xcel acted imprudently regarding the October 2023 outage at PINGP.

The Commission is unpersuaded that a contested case is required to resolve any disputed material facts necessary to inform a prudence determination. In reaching its conclusion, the Commission relies on facts that Xcel does not dispute showing that Xcel's imprudence enabled workers at PINGP to unintentionally strike the buried cables and cause the outage at PINGP.²

Xcel's own assessment of the situation stated the incident occurred because of deficient oversight and inadequate processes that fell below the standard expected for excavation work at a nuclear facility. While Xcel asserted that its actions before and after the incident were prudent, the Company failed to provide any explanation how its oversight of the excavation project was prudent in light of the deficiencies highlighted by the commenters and identified by Xcel.

Xcel knew or should have known that critical cables could be buried in the vicinity of the planned excavation site at a nuclear power plant. Despite this knowledge, the Company failed to implement appropriate safeguards or provide reasonable oversight of the workers that struck the underground cable causing the outage. Had Xcel prudently implemented oversight and procedural safeguards that met the standards expected for excavation work at the nuclear facility, the excavation team would have been aware of the existence of the buried cable it struck, and the incident and resulting outage would not have occurred as it did.

C. Requirement to Include Interest in Outage-Related Refund

1. Positions of the Commenters

The Department noted that the FCA does not include a carrying charge, but the Commission has previously required the inclusion of interest when ordering refunds for outages caused by imprudent management. The Department contended that it would be appropriate for the Commission to require Xcel to include interest using the U.S. Federal Reserve Prime Rate in any outage-related refunds ordered in this docket. CUB supported the Department's recommendation.

2. Commission Action

The Commission agrees with the Department and will require Xcel to include interest using the U.S. Federal Reserve's Prime Rate in any outage-related refund. It is appropriate to require the inclusion of interest on these payments because affected ratepayers should not pay for portions of costs incurred due to the Company's imprudence.

D. Appropriate Ratepayer Refund Amount

As discussed below, commenters proposed several methods of calculating the appropriate ratepayer refund amount for outage costs caused by Xcel's lack of prudence.

² The Commission's determination of imprudence is not based on any of Xcel's lessons learned with the benefit of hindsight or the fact that the Company has taken remedial measures based on these lessons learned. Rather, the Commission's conclusion is based on a finding that the outage occurred because Xcel allowed work to progress in the field without all controls in place that would be expected for work at a nuclear plant.

1. Positions of the Commenters

a. The Department

The Department used data from Xcel's initial filing to calculate the amount that Xcel should refund to ratepayers. The Department said that Xcel calculates the cost of an outage by estimating the cost of market energy during the applicable period (replacement cost) and how much it would have cost to run the unit (unit cost). According to the Department, the difference between the replacement cost and the unit cost is how much ratepayers lost due to the outage and equals the amount that should be refunded.

The Department also noted that to some extent, ratepayers may have received some degree of benefit from projects undertaken during the outage that could offset a portion of outage costs. Although noting that Xcel did not satisfy its burden to demonstrate the existence or degree of any offsetting benefits, the Department proposed a compromise with Xcel refunding ratepayers only half of the outage costs attributable to the period designated a "planned outage" by Midcontinent Independent System Operator, Inc. (MISO).

The Department recommended refunds resulting from outage impacts at both Unit 1 and Unit 2. Because the timeline of each unit's outage is unique, the Department addressed each unit individually.

i. Unit 1

The Department explained that the 103-day outage of Unit 1 should be separated into two distinct periods. The first 57-day period runs from October 19 through December 14 and constitutes an unplanned or forced outage. The Department recommended refunding ratepayers 100% of costs for this period. The second 46-day period starts on December 15 when MISO authorized Xcel to classify the outage as a planned outage and runs through January 29, 2024.³ The Department recommended a 50% refund of the costs incurred during the second planned outage period. For Unit 1's 2023 outage, the Department recommended a ratepayer refund of \$16,572,318.

ii. Unit 2

The Department explained that Xcel scheduled a 63-day outage at Unit 2, beginning on October 6, 2023, to replace the nuclear fuel. Unit 2 regained full power on March 19, 2024, 165 days after the refueling outage began. The Department stated that replacing a reactor-vessel head seal and a nuclear instrument detector justified extending the scheduled outage somewhat, but 57.2 days of incremental Unit 2 outage were attributed to the same cable replacement incident that caused the Unit 1 outage.

³ Although this outage persisted until January 29, 2024, the Department noted that for the purposes of this docket addressing true-up of the 2023 FCA, the second outage period runs through December 31, 2023. The Department recommended addressing recovery of the 2024 portion of the outage in the 2024 FCA true-up docket.

Accordingly, for Unit 2, the Department recommended a disallowance of 100% of the incremental outage costs from December 8, 2023⁴ through December 14, 2023, and 50% disallowance from December 15 through December 31. In total for Unit 2, the Department recommended disallowing \$3,387,191 in 2023 replacement power costs attributed to Xcel's imprudence.

iii. Revised Recommendation for Costs of both Units

After incorporating updated data that Xcel provided in its reply comments, the Department reduced its total recommended amount by \$3,901,963 and requested that the Commission order a total refund of \$16,057,546.

b. OAG

The OAG stated that Xcel's 2023 true-up filing proposed to recover \$25.8 million (less avoided operations and management expense) in replacement-power costs for Unit 1. According to the OAG, whether Xcel or MISO has designated some portion of the outage as "planned" is not relevant to determining the appropriate amount of a ratepayer refund because the ongoing outage, whether planned or unplanned, was caused by Xcel's imprudence. The OAG also contended that Xcel has failed to prove that the Company created any benefits to ratepayers resulting from the outage. The OAG stated the Company incurred these costs only due to its imprudence, and ratepayers should not be required to pay for the costs of a situation Xcel created.

The OAG did not address whether any refund was appropriate for outage costs related to Unit 2.

c. CUB

CUB applied the general methodology the Department used calculating the refund amount but agreed with the OAG that costs of 100% of both the planned and forced portions of the Unit 1 outage should be refunded to ratepayers. With this adjustment to the Department's calculations, CUB recommended a refund of \$18,295,551 for the outage of Unit 1.

CUB stated that the Department's evaluation of Unit 2 outage costs was reasonable and recommended a ratepayer refund in the amount of \$3,387,191.

d. Xcel

Xcel argued that the disallowances recommended by other commenters were excessive and based on unreasonable assumptions—including the assumption that Xcel's facilities would have been 100-percent available. According to Xcel, the best way to compare the actual costs of replacement power to estimated costs absent the outage would be to review market data and estimate unit performance under normal operating conditions. To the extent the Commission determines that some refund is warranted, the amount should reflect the units' overall performance compared to other industry participants.

⁴ December 8, 2023, was Xcel's estimated end date for the planned outage of Unit 2.

Although Xcel did not quantify any customer benefits, it agreed with the Department that the Company had provided some by utilizing the outage as an opportunity to conduct inspections that it could not have done if either unit had continued operating. Xcel asserted that its customers benefit from this work because it will avoid the need to shut down both units in the future.

Xcel suggested employing models generated by Plexos software to develop a more robust estimate likely to better reflect costs considering the operation of complex energy markets. Xcel explained that the Department used the Company's high-level estimates to calculate outage costs and provided revised estimates that Xcel argued would be more accurate. Using Xcel's updated—and allegedly more accurate—estimates in the Department's formula reduced the refund amount by \$3,901,963.

Although Xcel recommended these refinements to the Department's calculations, the Company still disagreed with the Department's revised recommendations and asserted that the Commission should refer the refund calculation issue to a contested case proceeding for additional record development.

2. Commission Action

The Commission appreciates the Department's efforts to equitably balance the outage costs and potential benefits to ratepayers by offsetting half of the outage's costs during the period that MISO designated the outage as planned. But the Commission is persuaded that further record development is necessary to demonstrate that such a compromise would be reasonable and in the public interest.

Considering the current record, the Commission concludes that it is unable to determine the appropriate ratepayer refund amount resulting from Xcel's imprudence. Accordingly, the Commission will refer this issue to the Office of Administrative Hearings for a contested case proceeding.

IV. Jurisdiction and Referral for Contested Case Proceedings

Under Minn. Stat. § 216B.03, every rate made, demanded, or received by any public utility must be just and reasonable. The Commission may permit a public utility to file rate schedules containing provisions for the automatic adjustment of charges for public utility service in direct relation to changes in certain costs including federally regulated wholesale rates for energy delivered through interstate facilities, and costs for fuel used in generation of electricity.⁵ Minnesota Rules 7825.2390 through 7825.2920 address automatic adjustments of charges.

After reviewing the filings of the parties in this matter and consideration of the arguments and positions expressed, the Commission finds that it cannot satisfactorily resolve all relevant issues to determine the appropriate amount for Xcel to refund ratepayers due to the lack of prudence regarding the October 2023 outage at PINGP. This proceeding involves contested material facts

⁵ Minn. Stat. § 216B.16, subd. 7.

and significant unresolved issues that warrant referral of the matter to the Office of Administrative Hearings for contested-case proceedings.⁶

V. Issues to be Addressed

Over the course of this case, the Commission expects the parties will thoroughly develop a full record, addressing, at a minimum, the appropriate refund amount due to ratepayers stemming from the lack of prudence regarding the October 2023 outage at PINGP.

VI. Procedural Outline

A. Administrative Law Judge

The Administrative Law Judge (ALJ) assigned to this case is Kimberly Middendorf. Her address is as follows: Office of Administrative Hearings, 600 North Robert Street, St. Paul, Minnesota 55101. Her mailing address is P.O. Box 64620, St. Paul, Minnesota 55164-0620. She can be reached through her legal assistant, Nichole Sletten at Nichole.sletten@state.mn.us or 651-361-7857.

B. Hearing Procedure

• Controlling Statutes and Rules

Hearings in this matter will be conducted in accordance with the Administrative Procedure Act, Minn. Stat. §§ 14.57–14.62; the rules of the Office of Administrative Hearings, Minn. R. 1400.5100–1400.8400; and, to the extent that they are not superseded by those rules, the Commission’s Rules of Practice and Procedure, Minn. R. 7829.0100–7829.4000.

Copies of these rules and statutes may be purchased from the Print Communications Division of the Department of Administration, 660 Olive Street, St. Paul, Minnesota 55155; (651) 297-3000. These rules and statutes also appear on the State of Minnesota’s website at www.revisor.mn.gov/pubs.

The Office of Administrative Hearings conducts contested case proceedings in accordance with the Minnesota Rules of Professional Conduct and the Professionalism Aspirations adopted by the Minnesota State Bar Association.

• Right to Counsel and to Present Evidence

In these proceedings, parties may be represented by counsel, may appear on their own behalf, or may be represented by another person of their choice, unless otherwise prohibited as the unauthorized practice of law. They have the right to present evidence, conduct cross-examination, and make written and oral argument. Under Minn. R. 1400.7000, they may obtain subpoenas to compel the attendance of witnesses and the production of documents.

⁶ Minn. R. 7829.1000.

Parties should bring to the hearing all documents, records, and witnesses necessary to support their positions.

- *Discovery and Informal Disposition*

Any questions regarding discovery under Minn. R. 1400.6700–1400.6800 or informal disposition under Minn. R. 1400.5900 should be directed to Ashley Marcus, 651-201-2192, ashley.marcus@state.mn.us, or Minnesota Public Utilities Commission, 121 7th Place East, Suite 350, St. Paul, Minnesota 55101-2147.

- *Protecting Not-Public Data*

State agencies are required by law to keep some data not public. Parties must advise the ALJ if not-public data is offered into the record. They should take note that any not-public data admitted into evidence may become public unless a party objects and requests relief under Minn. Stat. § 14.60, subd. 2.

- *Accommodations for Disabilities; Interpreter Services*

At the request of any individual, this agency will make accommodations to ensure that the hearing in this case is accessible. The agency will appoint a qualified interpreter if necessary. Persons must promptly notify the ALJ if an interpreter is needed.

- *Scheduling Issues*

The times, dates, and places of public and evidentiary hearings in this matter will be set by order of the ALJ after consultation with the Commission and intervening parties.

- *Notice of Appearance*

Any party intending to appear at the hearing must file a notice of appearance (Attachment A) with the ALJ within 20 days of the date of this Notice of and Order for Hearing.

- *Sanctions for Non-Compliance*

Failure to appear at a prehearing conference, a settlement conference, or the hearing, or failure to comply with any order of the ALJ, may result in facts or issues being resolved against the party who fails to appear or comply.

C. Parties and Intervention

The current parties to this case are Xcel, the Department, and the OAG. Other persons wishing to become formal parties shall promptly file petitions to intervene with the ALJ. They shall serve copies of such petitions on all current parties and on the Commission.⁷

⁷ Minn. R. 1400.6200.

D. Prehearing Conference

A prehearing conference will be held on Wednesday, November 20, 2024, at 1:00 p.m. using the following call-in information:

Call-in Information: +1 651-395-7448

Phone Conference ID: 901 929 23#

Persons participating in the prehearing conference should be prepared to discuss time frames, scheduling, discovery procedures, and similar issues. Potential parties are invited to attend the pre-hearing conference and to file their petitions to intervene as soon as possible.

VII. Ex Parte Communications

Restrictions on *ex parte* communications with Commissioners and reporting requirements regarding such communications with Commission staff apply to this proceeding from the date of this Order. Those restrictions and reporting requirements are set forth at Minn. R. 7845.7300–7845.7400, which all parties are urged to consult.

ORDER

1. The Commission accepts Xcel’s 2023 Fuel Forecast True-Up Report.
2. The Commission approves Xcel’s proposed refund of \$126 million to Minnesota ratepayers.
3. Within fourteen days of the date of this order, Xcel must submit a compliance filing with the total refund calculation.
4. In future true-up petitions, Xcel must include the following information for planned outages: unit, outage category, primary reason for planned outage, outage start and end dates, duration in days, reason for planned outage, description of actions taken during outage, and change in energy costs due to outage.
5. The Commission determines Xcel acted imprudently regarding the October 2023 outage at Prairie Island.
6. The Commission refers this matter to the Minnesota Office of Administrative Hearings for a contested case to determine the appropriate refund amount due to customers due to Xcel’s lack of prudence regarding the October 2023 outage at Prairie Island.
7. The Commission requires that Xcel include interest using the U.S. Federal Reserve Prime Rate in any outage-related refund approved.

8. This order shall become effective immediately.

BY ORDER OF THE COMMISSION



Will Seuffert
Executive Secretary



This document can be made available in alternative formats (e.g., large print or audio) by calling 651.296.0406 (voice). Persons with hearing or speech impairment may call using their preferred Telecommunications Relay Service or email consumer.puc@state.mn.us for assistance.

OAH Docket Number: 21-2500-40336

STATE OF MINNESOTA
OFFICE OF ADMINISTRATIVE HEARINGS

In the Matter of Xcel Energy's Petition for
Approval of its 2023 Annual Fuel Forecast
and Monthly Fuel Cost Charges
PLEASE TAKE NOTICE that:

NOTICE OF APPEARANCE

1. The party/agency named below (Party/Agency) will appear at the prehearing conference and all subsequent proceedings in the above-entitled matter.

2. By providing its email address below, the Party/Agency acknowledges that it has read and agrees to the terms of the Office of Administrative Hearings' e-Filing policy and chooses to opt into receiving electronic notice from the Office of Administrative Hearings in this matter. **Note: Provision of an email address DOES NOT constitute consent to electronic service from any opposing party or agency in this proceeding.**¹

3. The Party/Agency agrees to use best efforts to provide the Office of Administrative Hearings with the email address(es) for opposing parties and their legal counsel.

Party's/Agency's Name: _____

Email: _____ Telephone: _____

Mailing Address: _____

Party's/Agency's Attorney: _____

Firm Name: _____

Email: _____ Telephone: _____

Mailing Address: _____

Respondent's/Opposing Party's Name: _____

Email: _____ Telephone: _____

Mailing Address: _____

Dated: _____

Signature of Party/Agency or Attorney

¹ In order to opt in to electronic notice, this form must be emailed to OAH.efiling.support@state.mn.us. If the party does not wish to opt in to electronic notice, this form may be filed with the Office of Administrative Hearings via facsimile, U.S. Mail, or personal service. See Minn. Stat. § 14.58, Minn. R. 1400.5550, subps. 2-5.

CERTIFICATE OF SERVICE

I, Mai Choua Xiong, hereby certify that I have this day, served a true and correct copy of the following document to all persons at the addresses indicated below or on the attached list by electronic filing, electronic mail, courier, interoffice mail or by depositing the same enveloped with postage paid in the United States mail at St. Paul, Minnesota.

Minnesota Public Utilities Commission

**ORDER APPROVING 2023 FUEL-CLAUSE TRUE UP REPORT, REQUIRING
ADDITIONAL FILINGS, FINDING IMPRUDENCE, AND NOTICE OF AND
ORDER FOR HEARING**

Docket Number **E-002/AA-22-179**

Dated this 15th day of November, 2024

/s/ Mai Choua Xiong

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James	Canaday	james.canaday@ag.state.mn.us	Office of the Attorney General-RUD	Suite 1400 445 Minnesota St. St. Paul, MN 55101	Electronic Service	No	OFF_SL_22-179_Official
John	Coffman	john@johncoffman.net	AARP	871 Tuxedo Blvd. St, Louis, MO 63119-2044	Electronic Service	No	OFF_SL_22-179_Official
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_22-179_Official
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John	Farrell	jfarrell@ilsr.org	Institute for Local Self-Reliance	2720 E. 22nd St Institute for Local Self-Reliance Minneapolis, MN 55406	Electronic Service	No	OFF_SL_22-179_Official
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