

November 12, 2025

Sasha Bergman
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. G002/GR-25-356

Dear Ms. Bergman,

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

*Application for a Proposed Increase in Natural Gas Rates of Northern States Power
Company, doing business as Xcel Energy.*

The Petition was filed by Northern States Power Company, doing business as Xcel Energy (Xcel) on October 31, 2025.

Due to administrative error, these comments were not filed by the November 12, 2025 deadline. The Department apologizes for the delay and respectfully requests that the Commission consider these late-filed comments. The Department recommends that the Minnesota Public Utilities Commission (Commission) accept Xcel's filing as complete and refer this matter to the Court of Administrative Hearings. The Department also recommends that the Commission allow Xcel to implement its proposed interim rate revenue deficiency, but modified to limit the rate increase for residential customers to \$16.2 million, or 50 percent of the requested increase, and reduce its interim rate revenue deficiency accordingly. The Department is available to answer any questions the Commission may have.

Sincerely,

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

MBK/JT/ar
Attachment

Before the Minnesota Public Utilities Commission

Comments of the Minnesota Department of Commerce

Docket No. G002/GR-25-356

I. INTRODUCTION

On October 31, 2025, Northern States Power Company, doing business as Xcel Energy (Xcel or the Company) filed a general rate case (Application), seeking to increase rates for gas service in Minnesota. In its petition, Xcel seeks authority for a net increase in rates of \$63.40 million (approximately 8.2%) for 2026.¹ If the Minnesota Public Utilities Commission (Commission) decides to suspend this proposed rate increase under Minnesota Statutes § 216B.16, subdivision 2, the Company requests, pursuant to Minnesota Statutes § 216B.16, subdivision 3, that a Minnesota jurisdictional interim rate increase of \$51.47 million, or approximately 6.8%, be effective on January 1, 2026, with final rates becoming effective within ten months of the date of the Company's Application.² Department Table 1 provides a summary of the proposed net increase and proposed increase including cost transfers from rolling rider revenues into base rates for general and interim rates. In its Application, Xcel also proposes changes to the terms and conditions of their Gas Rate Book in Volume 2D (Proposed Tariff Sheets), including an increase in the monthly customer charge and increase in the distribution charge for most customers.

Department Table 1: Summary of Proposed Net General Rate Increases³

Rate Type	Proposed Net Increase		Proposed Increase Including Cost Transfers Between Riders and Base Rates	
	Amount	Percent	Amount	Percent
General Rates	\$63.40m	8.2%	\$86.14m ⁴	11.1% ⁵
Interim Rates	\$51.47m	6.8%	NA	NA

¹ Xcel's Initial Filing – Vol 1, Notice of Change in Rates and Interim Rate Petition, October 31, 2025, (eDockets) [202510-224501-01](#) at 1 (PDF pages 2-3), (hereinafter "Initial Filing – Vol 1").

² The Department notes, as there are currently multiple rate cases underway, an additional 90 days beyond the typical 10 month rate suspension period window is allowable, per Minn. Stat. 216B.16, Subp. 2, part (f).

³ Initial Filing – Vol 1's Notice of Change in Rates at 3 (PDF page 19). The Proposed Increase including Cost Transfers between Riders and Base Rates is calculated based on the proposed net increase plus "roll-in" of certain rider revenues as outlined in the Initial Filing – Vol 1.

⁴ \$63.40 million + \$22.74 million.

⁵ Estimation using \$773.2 million as original base rate.

II. PROCEDURAL BACKGROUND

October 31, 2025	Xcel filed a general rate case application.
November 3, 2025	The Public Utilities Commission (Commission) issued a Notice of Comment Period on Completeness and Procedures.

Topics open for comment:

- Whether Xcel Energy's application complies with the filing requirements of Minn. Stat. § 216B.16, Minn. Rules, parts 7825.3100 to 7825.4400, and relevant Commission Orders?
- Whether this matter be sent to the Court of Administrative Hearings for a contested case hearing and if so, what should be the scope of the hearing?

The Minnesota Department of Commerce, Division of Energy Resources (Department) submits the following comments, pursuant to the Commission's notice.⁶

III. DEPARTMENT ANALYSIS

The Department reviewed the contents of the Application to verify Xcel's compliance with:

- Statutory Requirements (Minnesota Statutes § [216B.16](#));
- Commission's rules governing filing requirements for rate changes (Minnesota Rules, parts [7825.3100](#) through 7825.4400);
- Commission policy statements,⁷ with the caveat that a full analysis of compliance with certain Policy statements will require factual analysis in the rate case;
- Commission Orders pursuant to Xcel Energy's most recent general rate case in Docket No. G002/GR-23-413; and
- Commission orders in various dockets prior to or subsequent to Xcel's most recent general rate case.

A. FILING COMPLETENESS

Xcel provided a list of regulatory requirements in Volume 2, Direct Testimony and Schedules of Amy. A. Liberkowski on Policy, specifically Schedule 2 Completeness Matrix, identifying where in the Petition the Company addressed the relevant statutes and rules, Commission policy statements, and prior Commission orders. Based on its review, the Department concludes that the Company's Application includes the filing materials required under Minnesota Statutes § 216B.16 and Minnesota Rules.

⁶ Commission's Notice of Comment Period, November 3, 2025, (eDockets) [202511-224607-01](#) at 1 (hereinafter "Commission's notice").

⁷ On June 14, 1982, the Commission issued policy statements on rate cases to assist utilities by providing advanced guidance on the likely treatment of specific issues (link to [interim rates policy statement](#)).

In Volume 1, Notice of Change in Rates and Interim Rates Petition, Xcel provided a Non-Public and Highly Confidential Index which identified a section in Volume 3 that was considered and marked as Highly Confidential Information and as a result was filed in a separate docket in G002/M-25-358.⁸ The Department confirmed that this information was filed in eDockets and was complete.

The Department emphasizes that its review at this stage of the proceeding pertains only to whether the Company's Application complied with the applicable filing requirements, not as to whether Xcel met its burden of proof to show that its proposals are just and reasonable.⁹ Such analysis is the focus of the investigatory period in the initial stage of the proceeding, based on the merits of the Application. Therefore, issues can be and will be further developed through information requests. To be clear, Xcel, like all utilities, always has the burden of proof to show that its rate proposals are reasonable. The Department appreciates the efforts by the Company to date in keeping the Department informed and responding to questions.

Accordingly, the Department recommends that the Commission accept the Application as being complete as of October 31, 2025 and refer this matter to the Court of Administrative Hearings for a contested case proceeding.

B. SCOPE OF ISSUES TO BE ADDRESSED

Regarding scope, the Department recommends that the Commission request that the following issues be addressed, along with any particular issues the Commission would like to see developed in this proceeding:

- Are the test year revenue requirement increases sought by the Company reasonable, or will they result in unreasonable and excessive earnings?
- Is the class cost of service and rate design proposed by the Company reasonable?
- Are the Company's proposed capital structure, cost of capital, and return on equity reasonable?

C. REQUEST FOR SPECIALIZED TECHNICAL ISSUES

Minn. Stat § 216B. .62, subd. 8, states:

If the commission ... determines that it is necessary, in order to carry out its duties imposed under this chapter ... to conduct an investigation or

⁸ Initial Filing – Vol 1, Attachment A at 7 (PDF page 32).

⁹ See, § 216B.16, subd. 4; [February 2, 2015 OAH Findings of Fact, Conclusions of Law and Order in Docket E002/CI-13-754](#), stating, in part, that:

A utility is not protected by any presumption of recovery simply by filing a request to increase rates. In order to recover any costs, the utility must produce sufficient evidence to prove that the rates it has requested are reasonable. If the utility fails to do so, then the costs must be disallowed; equally, if a public agency or other intervenor demonstrates that costs are unreasonable or imprudent, then they must be disallowed as well.

audit of any public utility operations, practices, or policies requiring specialized technical professional investigative services for the inquiry, the commission may request the commissioner of commerce to seek authority from the commissioner of management and budget to incur costs reasonably attributable to the specialized services.

Based on its review to date, the Department has identified one area in Xcel's Application for which it may require expert assistance. Specifically, the Company's proposal to include in rate base its prepaid pension asset and its accrued retiree medical and post-employment benefit liability.¹⁰ Pursuant to Minn. Stat. § 216B.62, subd. 8, the Department requests that the Commission deem it necessary to conduct an investigation of public utility operations, practices, or policies requiring specialized technical professional investigative services for the inquiry, and therefore, requests that the Commissioner of the Department of Commerce seek authority from the Commissioner of Management and Budget to incur costs for the specialized services to assist with any proceedings related to Docket Nos. G002/GR-25-356.

D. INTERIM RATES

D.1. Xcel's Interim Rate Proposal

The Department does not generally weigh in on interim rate issues. However, in light of recent Commission requests and decisions, the Department offers the following comments on the Company's interim rate proposals based on the facts in this proceeding.¹¹

Minnesota Statutes § 216B.16, subd. 3(b) stipulates that:

Unless the commission finds that exigent circumstances exist, the interim rate schedule shall be calculated using the proposed test year cost of capital, rate base, and expenses, except that it shall include: (1) a rate of return on common equity for the utility equal to that authorized by the commission in the utility's most recent rate proceeding; (2) rate base or expense items the same in nature and kind as those allowed by a currently

¹⁰ Direct Testimony of Xcel Witness Richard Schrubbe in Volume 2B, 6 of 6.

¹¹ The term "ex parte" in the interim rate statute does not require that the Commission adopt the utility's proposal with no examination. *Petition of Otter Tail Power Co.*, 417 N.W.2d 677, 680 (Minn. Ct. App. 1988). The term likewise does not prevent the Commission from considering the comments of other parties in its determination. *In re App'l by Minn. Power for Auth. to Increase Rates for Elec. Serv. in Minn.*, MPUC Docket No. E-015/GR-19-442, Order Setting Interim Rates at 3 (Dec. 23, 2019). Rather, when section 216B.16 is read as a whole, the term "ex parte" merely distinguishes the more limited interim-rate process from the contested case and public hearing provisions for final rates. Compare Minn. Stat. § 216B.16, subd. 3 with *Id.*, subd. 2; see also *In re App'l of Minn. Power for Auth. to Increase Rates for Elec. Serv. in Minn.*, 838 N.W.2d 747, 755 n.4 (Minn. 2013), as modified on denial of rehearing (Oct. 31, 2013) (stating in dicta that the interim rate process is "ex parte" because it occurs "without a public hearing," while the final rate fully comports with notions of due process and may include notice, discovery, and a public hearing).

effective order of the commission in the utility's most recent rate proceeding; and (3) no change in the existing rate design.

Based on its application of the formula set forth in statute to be used in the absence of exigent circumstances, Xcel is requesting for interim rate purposes a \$51.47 million or about a 6.8% increase in rates starting on January 1, 2026, including \$32.3 million for the residential class.¹² The Department notes that in the Company's last gas rate case in Docket No. G002/GR-23-413, Xcel requested an interim rate increase of \$51.2 million (or 8.5%) for 2024.¹³

The Department performed a cursory review of Xcel's interim rate proposal and did not identify any rate base or expense items included in the proposal that should have been excluded, or any change to existing rate design. In addition, the Company has appropriately used its currently authorized return on equity.

D.2. Exigent Circumstances

As noted above, Xcel's interim rate proposal is based on its application of the formula set forth in statute to be applied in the absence of exigent circumstances. However, several factors are creating economic uncertainty and hardship for Xcel's residential customers, the combined effects of which amount to exigent circumstances that justify departing from statutory formula.

The ongoing federal government shutdown has threatened food assistance for millions of Americans, including 440,000 Minnesotans.¹⁴ As of Monday, November 10th, the U.S. Senate had begun taking steps to end the shutdown.¹⁵ However, the proposed resolution would fund the government only through late January, 2026, at which point the government may shut down again. The short-term nature of the agreement does little to alleviate concerns about the status of these assistance programs, particularly given the federal government's indicated unwillingness to continue funding them during the shutdown with contingency reserves or other alternate fundings sources.¹⁶

Similarly, subsidies for health insurance plans purchased through Affordable Care Act (ACA) exchanges, are set to expire at the end of the year, and the federal government has thus far generally been resistant to renewing them. If the subsidies expire, costs to consumers will increase significantly.¹⁷

In addition, the labor market is showing concerning signs of deterioration, as announced layoffs last month were the highest for the month of October in over 20 years, and layoffs year-to-date are up

¹² Initial Filing – Vol 1, at 1 (PDF pages 2-3) and Schedule 2.

¹³ *Application for Authority to Increase Natural Gas Rates*, Xcel, Initial Filing – Vol 1, November 1, 2023, Docket Nos. G002/GR-23-413 and G002/M-23-411, (eDockets) [202311-200097-01](#), at 1 (PDF page 2).

¹⁴ See <https://mn.gov/governor/newsroom/press-releases/#/detail/appld/1/id/710848>.

¹⁵ See <https://www.npr.org/2025/11/09/nx-s1-5603659/government-shutdown-senate-agreement>.

¹⁶ See <https://www.cbsnews.com/news/trump-administration-states-undo-steps-full-snap-benefits/>.

¹⁷ See <https://www.cnbc.com/2025/11/08/aca-subsidy-cliff-government-shutdown.html>.

65% relative to the first 10 months of 2024.¹⁸ At the same time, hiring has slowed significantly, to its lowest year-to-date total since 2011.

Further, inflation has started increasing again, driven in part by new tariffs on imports implemented the federal level.¹⁹ The burden of tariffs and inflation disproportionately affects low-income households, which spend a larger percentage of their income on consumption. Therefore, even though inflation is notably lower than in 2022, the recent increase has imposed new hardship on low-income ratepayers.

Based on the combined effects of these factors, the Department recommends that the Commission find that exigent circumstances exist for Xcel's residential customers, and that these circumstances justify deviating from the interim rate formula set forth in statute. The Department notes that the Commission has found exigent circumstances, for example, in Xcel's 21-630 rate case and lowered the interim rates for residential customers.²⁰ The Department therefore recommends that the Commission approve Xcel's proposed interim rate increase, modified to allow only 50 percent of the proposed increase for the residential class, or \$16.2 million.

IV. DEPARTMENT RECOMMENDATIONS

Based on its review the Department recommends that the Commission:

1. Accept Xcel Energy's rate case application in the present docket as complete as of October 31, 2025;
2. Refer this matter to the Court of Administrative Hearings for a contested case hearing, with the following issues addressed, along with any other issues the Commission would like developed in this proceeding:
 - a. Are the test year revenue requirement increases sought by the Company reasonable, or will it result in unreasonable and excessive earnings?
 - b. Is the class cost of service and rate design proposed by the Company reasonable?
 - c. Are the Company's proposed capital structure, cost of capital, and return on equity reasonable?
3. Request that the Department seek authorization under Minn. Stat. § 216B.62 from the Commissioner of Management and Budget to incur costs for specialized technical professional investigative services to develop and evaluate the record on the Company's

¹⁸ See <https://www.challengergray.com/blog/october-challenger-report-153074-job-cuts-on-cost-cutting-ai/>.

¹⁹ See <https://www.npr.org/2025/07/15/nx-s1-5467331/trump-tariffs-low-income-households>.

²⁰ *Application for Proposed Increase in Electric Rates of Northern States Power Company, doing business as Xcel Energy*, Xcel, Initial Application, October 25, 2021, Docket Nos. E002/GR-21-630 & E002/M-21-748, (eDockets) [202110-179078-01](#). The Commission limited the residential interim rate to match the lower interim rates outlined in Xcel's Alternative Interim Rate Proposal, due to exigent circumstances brought on by impacts from the COVID-19 pandemic.

rate case, including but not limited to, proposal to include in rate base its prepaid pension asset and its accrued retiree medical and post-employment benefit liability.²¹

4. Allow Xcel to implement its annual interim rate revenue deficiency increase as proposed for 2026—except that, due to exigent circumstances, the Company must limit the rate increase for residential customers to \$16.2 million (50% of the requested amount) and reduce the interim rate revenue deficiency accordingly.

²¹ Direct Testimony of Xcel Witness Richard Schrubbe in Volume 2B, 6 of 6.

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
Comments

Docket No. G002/GR-25-356

Dated this **13th** day of **November 2025**

/s/Sharon Ferguson

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
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2	Katherine	Arnold	katherine.arnold@ag.state.mn.us		Office of the Attorney General - Department of Commerce	445 Minnesota Street Suite 1400 St. Paul MN, 55101 United States	Electronic Service		No	GR-25-356
3	Mara	Ascheman	mara.k.ascheman@xcelenergy.com	Xcel Energy		414 Nicollet Mall Fl 5 Minneapolis MN, 55401 United States	Electronic Service		No	GR-25-356
4	Gail	Baranko	gail.baranko@xcelenergy.com	Xcel Energy		414 Nicollet Mall 7th Floor Minneapolis MN, 55401 United States	Electronic Service		No	GR-25-356
5	Sasha	Bergman	sasha.bergman@state.mn.us		Public Utilities Commission		Electronic Service		Yes	GR-25-356
6	Elizabeth	Brama	ebrama@taftlaw.com	Taft Stettinius & Hollister LLP		2200 IDS Center 80 South 8th Street Minneapolis MN, 55402 United States	Electronic Service		No	GR-25-356
7	Matthew	Brodin	mbrodin@allete.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	GR-25-356
8	Mike	Bull	mike.bull@state.mn.us		Public Utilities Commission	121 7th Place East, Suite 350 St. Paul MN, 55101 United States	Electronic Service		Yes	GR-25-356
9	Robert S.	Carney, Jr.				4232 Colfax Ave. S. Minneapolis MN, 55409 United States	Paper Service		No	GR-25-356
10	Olivia	Carroll	oliviac@cubminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota St W1360 St. Paul MN, 55101 United States	Electronic Service		No	GR-25-356
11	Joey	Cherney	joey.cherney@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	445 Minnesota Street STE 1800 Saint Paul MN, 55101 United States	Electronic Service		No	GR-25-356
12	John	Coffman	john@johncoffman.net	AARP		871 Tuxedo Blvd. St. Louis MO, 63119-2044 United States	Electronic Service		No	GR-25-356
13	Generic	Commerce Attorneys	commerce.attorneys@ag.state.mn.us		Office of the Attorney General - Department of Commerce	445 Minnesota Street Suite 1400 St. Paul MN, 55101 United States	Electronic Service		Yes	GR-25-356

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15	George	Crocker	gwillc@nawo.org	North American Water Office		5093 Keats Avenue Lake Elmo MN, 55042 United States	Electronic Service		No	GR-25-356
16	Ian M.	Dobson	ian.m.dobson@xcelenergy.com	Xcel Energy		414 Nicollet Mall, 401-8 Minneapolis MN, 55401 United States	Electronic Service		No	GR-25-356
17	Richard	Dornfeld	richard.dornfeld@ag.state.mn.us		Office of the Attorney General - Department of Commerce	Minnesota Attorney General's Office 445 Minnesota Street, Suite 1800 Saint Paul MN, 55101 United States	Electronic Service		No	GR-25-356
18	Brian	Edstrom	briane@cubminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota St Ste W1360 Saint Paul MN, 55101 United States	Electronic Service		No	GR-25-356
19	Rebecca	Eilers	rebecca.d.eilers@xcelenergy.com	Xcel Energy		414 Nicollet Mall - 401 7th Floor Minneapolis MN, 55401 United States	Electronic Service		No	GR-25-356
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21	Edward	Garvey	garveyed@aol.com	Residence		32 Lawton St Saint Paul MN, 55102 United States	Electronic Service		No	GR-25-356
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23	Matthew B	Harris	matt.b.harris@xcelenergy.com	XCEL ENERGY		401 Nicollet Mall FL 8 Minneapolis MN, 55401 United States	Electronic Service		No	GR-25-356
24	Annete	Henkel	mui@mnuutilityinvestors.org	Minnesota Utility Investors		413 Wacouta Street #230 St. Paul MN, 55101 United States	Electronic Service		No	GR-25-356
25	Valerie	Herring	vherring@taftlaw.com	Taft Stettinius & Hollister LLP		2200 IDS Center 80 S. Eighth Street Minneapolis MN, 55402 United States	Electronic Service		No	GR-25-356

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27	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	GR-25-356
28	Richard	Johnson	rick.johnson@lawmoss.com	Moss & Barnett		150 S. 5th Street Suite 1200 Minneapolis MN, 55402 United States	Electronic Service		No	GR-25-356
29	Sarah	Johnson Phillips	sjphillips@stoel.com	Stoel Rives LLP		33 South Sixth Street Suite 4200 Minneapolis MN, 55402 United States	Electronic Service		No	GR-25-356
30	Nicolle	Kupser	nkupser@greatermngas.com	Greater Minnesota Gas, Inc.		1900 Cardinal Ln PO Box 798 Faribault MN, 55021 United States	Electronic Service		No	GR-25-356
31	Peder	Larson	plarson@larkinhoffman.com	Larkin Hoffman Daly & Lindgren, Ltd.		8300 Norman Center Drive Suite 1000 Bloomington MN, 55437 United States	Electronic Service		No	GR-25-356
32	Annie	Levenson Falk	annief@cupminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota Street, Suite W1360 St. Paul MN, 55101 United States	Electronic Service		No	GR-25-356
33	Eric	Lipman	eric.lipman@state.mn.us		Office of Administrative Hearings	PO Box 64620 St. Paul MN, 55164-0620 United States	Electronic Service		No	GR-25-356
34	Christine	Marquis	regulatory.records@xcelenergy.com	Xcel Energy		414 Nicollet Mall MN1180-07-MCA Minneapolis MN, 55401 United States	Electronic Service		Yes	GR-25-356
35	Mary	Martinka	mary.a.martinka@xcelenergy.com	Xcel Energy Inc		414 Nicollet Mall 7th Floor Minneapolis MN, 55401 United States	Electronic Service		No	GR-25-356
36	Stephen	Melchionne	stephen.melchionne@ag.state.mn.us		Office of the Attorney General - Department of Commerce	445 Minnesota Street, Ste. 1400 St. Paul MN, 55101 United States	Electronic Service		No	GR-25-356
37	Kimberly	Middendorf	kimberly.middendorf@state.mn.us		Office of Administrative Hearings	PO Box 64620 600 Robert St N Saint Paul MN, 55164-0620 United States	Electronic Service		No	GR-25-356

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39	Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP		33 South Sixth St Ste 4200 Minneapolis MN, 55402 United States	Electronic Service		No	GR-25-356
40	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		No	GR-25-356
41	David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency		220 South Sixth Street Suite 1300 Minneapolis MN, 55402 United States	Electronic Service		No	GR-25-356
42	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	GR-25-356
43	Greg	Palmer	gpalmer@greatermngas.com	Greater Minnesota Gas, Inc.		1900 Cardinal Ln PO Box 798 Faribault MN, 55021 United States	Electronic Service		No	GR-25-356
44	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	GR-25-356
45	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	GR-25-356
46	Joseph L	Sathe	jsathe@kennedy-graven.com	Kennedy & Graven, Chartered		150 S 5th St Ste 700 Minneapolis MN, 55402 United States	Electronic Service		No	GR-25-356
47	Elizabeth	Schmiesing	eschmiesing@winthrop.com	Winthrop & Weinstine, P.A.		225 South Sixth Street Suite 3500 Minneapolis MN, 55402 United States	Electronic Service		No	GR-25-356
48	Peter	Scholtz	peter.scholtz@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	Suite 1400 445 Minnesota Street St. Paul MN, 55101-2131 United States	Electronic Service		No	GR-25-356
49	Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates		7400 Lyndale Ave S Ste 190 Richfield MN, 55423 United States	Electronic Service		No	GR-25-356
50	Suzanne	Todnem	suzanne.todnem@state.mn.us		Office of Administrative Hearings	600 Robert St N PO Box 64620 St. Paul MN, 55164 United States	Electronic Service		No	GR-25-356

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
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