BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

Chair

Katie J. Sieben

Valerie Means	Commissioner
Matthew Schuerger	Commissioner
Joseph K. Sullivan	Commissioner
John A. Tuma	Commissioner
In the Matter of the Application of Northern States Power Company for Authority to	ISSUE DATE: July 13, 2022
Increase Rates for Electric Service in the State of Minnesota, et al.	DOCKET NO. E-002/GR-12-961
In the Matter of the Application of Northern States Power Company for Authority to Increase Rates for Electric Service in the State of Minnesota	DOCKET NO. E-002/GR-13-868
In the Matter of the Review of the 2012-2013 Annual Automatic Adjustment Reports for All Electric Utilities	DOCKET NO. E-999/AA-13-599
In the Matter of the Review of the 2013-2014 Annual Automatic Adjustment Reports for All Electric Utilities	DOCKET NO. E-999/AA-14-579
In the Matter of the Review of the 2015-2016 Annual Automatic Adjustment Reports for All Electric Utilities	DOCKET NO. E-999/AA-16-523
In the Matter of the Department's Report on the Electric Utilities' 2016-2017 Annual Automatic Adjustment Reports for All Utilities	DOCKET NO. E-999/AA-17-492
In the Matter of the Review of the 2017-2018 Annual Automatic Adjustment Reports for All Electric Utilities	DOCKET NO. E-999/AA-18-373
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PROCEDURAL HISTORY

I. Background

On November 19, 2011, at the Northern States Power Company d/b/a Xcel Energy (Xcel) Sherburne County Generating Station (Sherco), a catastrophic failure of a turbine forced the

shutdown of a generating unit (Sherco Unit 3, or Sherco 3) until October 2013. In response to the prolonged outage, Xcel purchased replacement power and additional fuel from other sources, which Xcel's customers paid for through the automatic fuel-clause adjustment.

In November 2013, Xcel, the co-owner of Sherco 3, and their insurers initiated a lawsuit against the turbine manufacturer, General Electric Company (GE), for damages associated with the turbine failure and outage. They asserted five tort causes of action based on allegations that GE improperly designed and manufactured the turbine and failed to warn Xcel of certain risks.

On May 8, 2015, the Commission referred questions of Xcel's prudence in managing the circumstances surrounding the Sherco 3 outage, and the recoverability and ratemaking treatment of replacement power and additional fuel costs, to the annual fuel-clause adjustment dockets.¹

On June 2, 2016, the Commission decided to wait until the conclusion of the litigation regarding legal liability for the incident before deciding whether Xcel's energy replacement costs were prudently incurred and recoverable from ratepayers.²

On November 2, 2018, Xcel filed a litigation update stating that it had reached a settlement with GE resulting in a payment to Xcel, which would be credited to ratepayers, in exchange for the dismissal of Xcel's claims against GE in the lawsuit.

On April 11, 2019, the Commission authorized Xcel to refund the GE settlement proceeds as a credit to customers through the monthly fuel-clause adjustment beginning February 1, 2019.³ The Commission also ordered Xcel, at the conclusion of the litigation, to file information about the costs arising from the Sherco 3 incident; which of those costs have been recovered, approved for recovery, denied, or deferred; and any proceeds from insurance or third-party settlements.⁴

Following Xcel's settlement with GE, the trial proceeded on Xcel's insurers' claims against GE, with GE asserting as a defense that Xcel's own negligence caused the loss. The jury found that Xcel was negligent in its operation and maintenance of Sherco 3 and that this negligence was a direct cause of the loss. The jury found Xcel 48% at fault and GE 52% at fault. However, Xcel and its insurers did not plead a negligence claim against GE, and GE was not found liable on any claim. Accordingly, GE was not required to pay damages, and the district court entered judgment in favor of GE.

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¹ In the Matter of the Application of Northern States Power Company for Authority to Increase Rates for Electric Service in the State of Minnesota, Docket No. E-002/GR-13-868, Findings of Fact, Conclusions and Order, at 47 (May 8, 2015).

² In the Matter of the Review of the 2013-2014 Annual Automatic Adjustment Reports for All Electric Utilities, Docket No. E-999/AA-14-579, Order Acting on Electric Utilities' Annual Reports and Requiring Additional Filings, at 5 (June 2, 2016).

³ Order Authorizing Sherco Unit 3 Ratepayer Refund Amount and Method and Requiring Compliance Filing, at 4, Ordering Para. 1 (April 11, 2019).

⁴ *Id.* at Ordering Para. 2.

Xcel's insurers appealed, and the Minnesota Court of Appeals affirmed the district court's judgment in favor of GE.⁵ On April 28, 2020, the Minnesota Supreme Court denied Xcel's insurers' petition for further review, concluding the litigation.

II. Current Proceeding

On August 24, 2020, Xcel filed the post-litigation information required by the April 2019 order.

On September 30, 2020, the Commission requested comments on whether Xcel provided all the required information; whether all issues relating to the outage are resolved; whether to discontinue the requirement that Xcel file quarterly litigation updates; and how to proceed regarding issues of prudency, cost recoverability, and ratemaking treatment of replacement power and additional fuel costs associated with the Sherco 3 outage.

On January 15, 2021, the Department of Commerce, Division of Energy Resources (the Department) and the Office of the Attorney General—Residential Utilities Division (the OAG) filed comments recommending that the Commission require Xcel to reimburse ratepayers for all out-of-pocket energy replacement costs associated with the outage.

On January 27, 2021, Xcel filed reply comments arguing that a ratepayer refund is not warranted and, in the alternative, requesting contested-case proceedings.

On June 23, 2022, the matter came before the Commission.

FINDINGS AND CONCLUSIONS

I. Xcel's Litigation Updates

Pursuant to the Commission's April 11, 2019, order, Xcel filed a litigation update on August 24, 2020, identifying its total and Minnesota-jurisdictional costs associated with the Sherco 3 outage and explaining how it has recovered various components of those costs. Xcel recovered the energy replacement costs from customers through the monthly fuel-clause charge, and insurance proceeds covered most of the restoration costs to return the plant to service. Xcel also provided information about the settlement payment it received from the turbine manufacturer, which Xcel credited to customers through the February 2019 fuel-clause adjustment.

Xcel noted that, in its 2012 rate case, the Commission excluded from the test year all direct costs other than property taxes associated with Sherco 3, resulting in a disallowance of \$21.6 million, largely denying Xcel a return on that investment because Sherco 3 was not used and useful during the outage. Depreciation expenses were deferred and recovered in Xcel's next rate case.

All parties concluded that Xcel's post-litigation filing is complete and fulfills the reporting requirements of the April 2019 order. The Commission agrees.

⁵ Aegis Insurance Services, Ltd., and other interested insurers as subrogees of Northern States Power Co. and Southern Minnesota Municipal Power Agency vs. General Electric Company, et al., Docket No. A-19-0640, 2020 WL 614775 (Minn. App. 2020).

Additionally, because the Sherco 3 litigation has concluded, all parties recommended that the Commission terminate the existing requirement that Xcel file quarterly litigation updates. The Commission agrees with the parties and will authorize Xcel to discontinue providing quarterly updates on the concluded Sherco 3 litigation.

II. Investigation into the Prudence of Sherco 3 Energy Replacement Costs

A. Legal Standard

Every rate made, demanded, or received by a public utility must be just and reasonable.⁶ In incurring costs necessary to provide service, utilities are expected to act prudently to protect ratepayers from unreasonable risks. The burden to prove a rate is just and reasonable is on the utility, and any doubt as to reasonableness will be resolved in favor of the consumer.⁷

B. Positions of the Parties

1. The Department

The Department recommended that the Commission order Xcel to reimburse ratepayers the approximately \$17 million in replacement power costs that Xcel recovered through the monthly fuel-clause charge. This amount—which the Department called the "ratepayer harm"—was calculated based on the net total Sherco 3 outage costs, excluding the portions that were covered by insurance, reimbursed through the GE settlement, or disallowed in a past Commission proceeding.

The Department argued that, under fundamental principles of utility regulation, Xcel's investors assumed the risks of providing utility service—including costs from an outage—when they chose to invest in Xcel in exchange for an opportunity to receive a reasonable return from captive customers. Citing certain trial testimony as dispositive evidence that imprudent actions by Xcel caused or contributed to the outage, the Department argued that it would be unreasonable to impose the costs of Xcel's imprudence on customers, who were in no position to prevent or mitigate the costs. Rather, the Department argued, such costs are properly borne by Xcel's investors.

The Department raised a public-policy concern that a decision to hold ratepayers responsible for the outage costs Xcel failed to recover from the turbine manufacturer or insurers would have the broader future effect of diminishing utilities' incentive to vigorously pursue recovery from potentially liable third parties. This is because, in the Department's view, utilities would expect ratepayers to cover outstanding costs, thus insulating investors' profits against operational risks.

The Department asserted that the existing record is sufficient to support these findings and a ratepayer refund order, with no need for additional record development or further process. The Department based this argument on testimony of Xcel employees in the GE trial indicating that the utility delayed turbine inspections, contrary to manufacturer recommendations and Xcel's internal guidelines, and did not conduct testing after a contamination event despite having known that stress corrosion cracking (which Xcel found to be the cause of the outage) was a significant

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⁶ Minn. Stat. § 216B.03.

⁷ Minn. Stat. §§ 216B.03, 216B.16, subd. 4.

risk. The Department characterized this testimony as admissions by Xcel sufficient to prove the material facts that Xcel acted imprudently and that Xcel's imprudence caused the costs at issue. In light of the trial testimony, the Department argued that no material fact issues remain in dispute, so there is no need for further record development to support a reimbursement order.

2. The OAG

Like the Department, the OAG recommended that the Commission order Xcel to reimburse ratepayers for all out-of-pocket costs arising out of the Sherco 3 outage. The OAG argued it would be unreasonable to require Xcel's captive customers—who had no opportunity to prevent or mitigate the loss—to absorb the costs of anyone else's negligence, whether it was the fault of Xcel or of the turbine manufacturer Xcel contracted with.

The OAG questioned Xcel's prudence in agreeing to significant contractual limitations of liability favoring GE in the contract for the sale of the Sherco 3 turbine. The limitations of liability left Xcel little recourse in the event of damages caused by GE's negligence, thereby shifting substantial risks of equipment failure onto the utility or its customers. The OAG also argued that Xcel should have carried business-interruption insurance in case of such failures and should have replaced certain turbine equipment prior to the outage.

The OAG contended that a decision not to reimburse ratepayers for these costs would effectively endorse Xcel's treatment of ratepayers as a backstop to insulate shareholders from the costs of the utility's operational risks. As a public policy matter, the OAG argued that such a decision would disincentivize utilities from carrying business-interruption insurance, ensuring adequate protections in contracts, and taking other precautions in their future operations.

The OAG contended that the existing record is sufficient to resolve this matter and that any evidence developed through further proceedings would be duplicative of the testimony already given in the civil litigation and would compel the same result that was reached in the courts.

The OAG noted that in 2014, before the trial, Xcel had urged the Commission to make a prudency determination based on the narrower record that was available at that time. The OAG argued that Xcel's current reversal of its prior position on the sufficiency of the record is an unwarranted, unjust attempt to relitigate issues, not for a legitimate due-process reason but because the verdict was unfavorable to Xcel. The OAG emphasized that the record is more developed now than it was in 2014, so it is unreasonable to claim the current record is incomplete after arguing the 2014 record was sufficient.

The OAG contended that no further record development is necessary because (1) an extensive record of persuasive evidence has been developed through the litigation and (2) as these costs have been discussed and revisited in multiple Commission dockets over nearly a decade, Xcel has had ample opportunity to file any additional evidence and make any additional arguments it deemed necessary to meet its burden, including those that may have been excluded from court.

Alternatively, if the Commission declines to order Xcel to reimburse ratepayers based on the existing record, then the OAG would support referring the matter to the Office of Administrative Hearings for contested-case proceedings.

3. Xcel

Xcel argued that it acted prudently in connection with the Sherco 3 incident, the recovery of resulting costs from ratepayers is just and reasonable, and no refund is necessary. Alternatively, it requested referral to the Office of Administrative Hearings for contested-case proceedings if the Commission finds the existing record insufficient to support a prudency finding.

Noting that the Commission ordered a \$21.6 million disallowance in Xcel's 2012 rate case due to the outage, Xcel argued that the purpose of that disallowance was to protect ratepayers from effectively double-paying by paying both the base revenue requirement associated with the plant and the cost of replacing the same plant's energy output during the outage period. But Xcel argued it would not be reasonable to disallow both of these types of costs; because the 2012 disallowance compensated ratepayers for the outage by denying Xcel a return on its investment, customers have not overpaid and should not be refunded.

Xcel asserted that it did not have a fair opportunity to develop the record on issues material to this regulatory proceeding—e.g., whether Xcel acted prudently according to the standard of a reasonable electric utility with access to the same information under the same circumstances—in the litigation. Xcel's litigation strategy focused on proving GE was liable under specific tort claims: fraudulent concealment, willful and wanton negligence, gross negligence, professional negligence, and post-sale failure to warn. Although GE asserted as a defense that Xcel's own negligence caused or contributed to the damages, Xcel's prudence for purposes of cost recovery under the Commission's standards was not a focus of the litigation.

Xcel stated that the litigation did not analyze potentially relevant issues such as whether Xcel's business decisions balancing risks and costs were reasonable based on the utility's knowledge at the time and whether Xcel's operational procedures, training, monitoring, controls, and quality-assurance processes justified its decisions. Therefore, the record—reasonably—was not developed on those issues. Further, evidence pertaining to GE's alleged post-sale failure to warn was excluded from the jury when the court dismissed that legal claim as a matter of law; but regardless of whether GE's failure to give a particular warning made GE liable for damages under the tort claim asserted, evidence that Xcel did not receive a warning may nonetheless be probative of Xcel's knowledge at the time, which could affect a prudency determination.

Xcel further argued that, if the Commission were to order a refund, it would need additional record development to determine the correct net refund amount, considering ratepayer benefits and avoided costs. For example, Xcel argued that any refund should take into account the value added by plant replacements undertaken in the repair and restoration of Sherco 3—improvements largely paid for by insurance proceeds at a reduced cost to ratepayers. Additionally, if the Commission agrees with the Department and OAG that Xcel should have conducted additional inspections, replaced equipment, or carried business-interruption insurance, the avoided costs Xcel and its ratepayers would have incurred for those measures should offset any refund amount.

Noting that the trial record was limited by evidentiary rules that bind Minnesota courts but do not govern Commission proceedings, Xcel argued it should have an opportunity to offer additional evidence that may be relevant to the Commission's prudency determination despite its inadmissibility in the court case.

Additionally, because Xcel negotiated a settlement with GE before trial, Xcel was no longer a party and thus could not cross-examine witnesses or present its own evidence at trial while

Xcel's insurers and GE proceeded to litigate their claims and defenses, some of which touched on the reasonableness of Xcel's actions. Xcel argued that it would be unfair to base a prudency determination on the record from a trial in which Xcel did not participate without affording Xcel a full opportunity to supplement that record as an active party.

Asserting that prudence reviews involve complex, technically challenging issues specific to utilities, Xcel recommended that the Commission conduct an independent investigation in which the Commission may leverage its expertise and base its determination on facts pertaining directly to the issue of prudence for purposes of rate recovery. Xcel argued that a contested case is the best procedural framework available for this undertaking.

C. Commission Action

The Commission will refer this matter to the Office of Administrative Hearings for contested-case proceedings.

The Commission appreciates the Department's and the OAG's efforts to parse the litigation record and analyze the existing evidence in the context of this Commission investigation into the prudency, reasonableness, and rate treatment of energy replacement costs associated with the Sherco 3 outage. The litigation process and related regulatory proceedings have yielded substantial evidence that will be relevant to the Commission's inquiry.

However, significant issues remain to be resolved regarding whether Xcel's Sherco 3 energy replacement costs for the period from November 2011 to October 2013 were reasonable and prudent and, if not, what amount should be refunded to ratepayers. Contested-case proceedings will aid the Commission in resolving these issues.

Although the events underlying this regulatory proceeding and the litigation overlap, the respective questions asked in the two venues materially differ. The litigation focused on the turbine manufacturer's legal liability for certain tort claims, while the key question in this Commission proceeding—whether Xcel acted prudently for purposes of cost recovery under rate-regulation principles—was not addressed in the litigation. This imperfect alignment of issues between the two venues leads to imperfect alignment of the relevant evidentiary records. For this reason, Xcel's claim—that evidence exists that is relevant to the Commission's inquiry but has not yet entered the record because it answers questions that have not yet been asked—is plausible. If such evidence exists, the Commission will allow Xcel to offer it for appropriate review and consideration.

Further, Xcel indicated that the court excluded some evidence from the trial record either (1) due to evidentiary rules that do not govern Commission proceedings or (2) because the evidence pertained to claims the court summarily dismissed based on legal principles that may not apply to the issues presented in this regulatory context. A contested case specific to the questions posed herein will help ensure that the record available to the Commission is not unduly restricted by any court rules or tort laws that rightfully should not affect this proceeding.

Additionally, although the interests of Xcel and its insurers likely were largely aligned in the litigation, it warrants consideration that Xcel itself was not able to cross-examine witnesses or present evidence at trial after its pretrial settlement—a decision that secured a credit for Xcel's customers despite the subsequent verdict for GE. In this case, it is reasonable to conduct a contested case to ensure all parties to this proceeding have a fair opportunity to present evidence

and argument tailored to the applicable burden and standards, unconstrained by any extraneous litigation-strategy considerations that may have affected participation in the lawsuit.

Under the circumstances of this case, any efficiency benefit that could potentially be gained from denying the regulated party's request for further process—and thus reaching a merits decision based primarily on a record developed in a lawsuit trying related but not identical issues, which was bound by different evidentiary rules and substantive law and which was tried by different parties—is outweighed by the likely benefits of referring the matter for a contested case.

Contested-case proceedings will allow all parties a full, fair, transparent opportunity to develop a complete record and to contextualize the evidence through arguments aimed at the precise questions the Commission seeks to resolve. Employing these procedures will place the Commission in the best position to execute its decision-making role in this case.

In the contested case, Xcel will bear the burden to prove that its Sherco 3 energy replacement costs were prudently incurred and that it is just and reasonable to recover those costs from ratepayers (or to deny a refund of costs previously recovered).⁸ Any doubt as to reasonableness will be resolved in favor of ratepayers.⁹

III. Procedural Outline of Contested Case

A. Administrative Law Judge

The administrative law judge (ALJ) assigned to this case is Ann O'Reilly. Her office address is:

Administrative Law Judge Ann O'Reilly Office of Administrative Hearings 600 North Robert Street St. Paul, Minnesota, 55101

Her mailing address is:

Administrative Law Judge Ann O'Reilly P.O. Box 64620 St. Paul, Minnesota 55164-0620

The ALJ can be reached through her legal assistant, Michelle Severson, at 651-361-7874 or Michelle.Severson@state.mn.us.

B. Hearing Procedure

• Controlling Statutes and Rules

Hearings in this matter will be conducted in accordance with the Minnesota Administrative Procedure Act, Minn. Stat. §§ 14.57–14.62; the rules of the Office of Administrative Hearings,

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⁸ Minn. Stat. § 216B.03.

⁹ Minn. Stat. §216B.16, subd. 4.

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.

These rules and statutes can be accessed free of charge through 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.

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 Jason Bonnett at 651-201-2235 or Jason.Bonnett@state.mn.us, or:

Jason Bonnett 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 (attached) 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 and serve copies of such petitions on all current parties and on the Commission.¹⁰

D. Prehearing Conference

A prehearing conference will be held on **Monday**, **August 1**, **2022**, **at 1:30 p.m.**, via **Microsoft Teams**.

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.

E. 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 finds the filing of Northern States Power Company d/b/a Xcel Energy complete and in compliance with past Commission orders.
- 2. The Commission finds that litigation regarding Sherco 3 has finished and authorizes Xcel to discontinue providing quarterly litigation updates.
- 3. The Commission finds a genuine issue of material fact in dispute about whether Xcel's Sherco 3 energy replacement costs for the period November 2011 to October 2013 were reasonable and prudent and, if not, the amount of overcharges, plus interest, that should be returned to ratepayers.

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¹⁰ Minn. R. 1400.6200.

- 4. The Commission refers this matter to the Office of Administrative Hearings for a contested-case proceeding in which Xcel bears the burden to establish that any or all of the energy replacement costs were reasonably and prudently incurred, applying good utility practices.
- 5. If the Department of Commerce, Division of Energy Resources deems it necessary, the Commission requests that the Department seek authorization to incur costs for any specialized services required to assist in this matter under Minn. Stat. § 216B.62.
- 6. The Commission delegates authority to its Executive Secretary to establish the schedule with the Office of Administrative Hearings to submit the report of the contested case.
- 7. This order shall become effective immediately.

BY ORDER OF THE COMMISSION

Will Seuffert

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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: 65-2500-38476

STATE OF MINNESOTA OFFICE OF ADMINISTRATIVE HEARINGS

In the Matter of Sherco Unit 3 Energy Replacement Costs

NOTICE OF APPEARANCE

PLEASE TAKE NOTICE that:

- 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:	
Mailing Address:	
Party's/Agency's Attorney:	
Firm Name:	
Email:	Telephone:
Mailing Address:	
Respondent's/Opposing Party's Name:	
Email:	Telephone:
Mailing Address:	
Dated:	
Signa	ture of Party/Agency or Attorney

Note: This form must be served upon the opposing party/agency. Counsel may not withdraw from representation without written notice.

¹ In order to opt in to electronic notice, this form must be emailed to <u>OAH.efiling.support@state.mn.us</u>. 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, Chrishna Beard, 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 NOTICE OF AND ORDER FOR HEARING

Docket Number E-002/GR-12-961; E-002/GR-13-868; E-999/AA-13-599; E-999/AA-14-579; E-999/AA-16-523; E-999/AA-17-492; E-999/AA-18-373
Dated this 13th day of July, 2022

/s/ Chrishna Beard

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Adam	Heinen	aheinen@dakotaelectric.co m	Dakota Electric Association	4300 220th St W Farmington, MN 55024	Electronic Service	No	OFF_SL_12-961_Official List
Michael	Норре	lu23@ibew23.org	Local Union 23, I.B.E.W.	445 Etna Street Ste. 61 St. Paul, MN 55106	Electronic Service	No	OFF_SL_12-961_Official List
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Brian	Meloy	brian.meloy@stinson.com	STINSON LLP	50 S 6th St Ste 2600 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_12-961_Official List
Andrew	Moratzka	andrew.moratzka@stoel.co m	Stoel Rives LLP	33 South Sixth St Ste 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_12-961_Official List
David	Niles	david.niles@avantenergy.c om	Minnesota Municipal Power Agency	220 South Sixth Street Suite 1300 Minneapolis, Minnesota 55402	Electronic Service	No	OFF_SL_12-961_Official List
Generic Notice	Residential Utilities Division	residential.utilities@ag.stat e.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_12-961_Official List
Kevin	Reuther	kreuther@mncenter.org	MN Center for Environmental Advocacy	26 E Exchange St, Ste 206 St. Paul, MN 551011667	Electronic Service	No	OFF_SL_12-961_Official List
Richard	Savelkoul	rsavelkoul@martinsquires.com	Martin & Squires, P.A.	332 Minnesota Street Ste W2750 St. Paul, MN 55101	Electronic Service	No	OFF_SL_12-961_Official List
Christine	Schwartz	Regulatory.records@xcele nergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_12-961_Official List
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th PI E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_12-961_Official List
Janet	Shaddix Elling	jshaddix@janetshaddix.co m	Shaddix And Associates	7400 Lyndale Ave S Ste 190 Richfield, MN 55423	Electronic Service	Yes	OFF_SL_12-961_Official List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Ken	Smith	ken.smith@districtenergy.c	District Energy St. Paul Inc.	76 W Kellogg Blvd St. Paul, MN 55102	Electronic Service	No	OFF_SL_12-961_Official List
Byron E.	Starns	byron.starns@stinson.com	STINSON LLP	50 S 6th St Ste 2600 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_12-961_Official List
James M	Strommen	jstrommen@kennedy- graven.com	Kennedy & Graven, Chartered	150 S 5th St Ste 700 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_12-961_Official List
Eric	Swanson	eswanson@winthrop.com	Winthrop & Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_12-961_Official List
Lisa	Veith	lisa.veith@ci.stpaul.mn.us	City of St. Paul	400 City Hall and Courthouse 15 West Kellogg Blvd. St. Paul, MN 55102	Electronic Service	No	OFF_SL_12-961_Official List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.st ate.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN	Electronic Service	Yes	OFF_SL_13-599_13-599
				55101			
Brooke	Cooper	bcooper@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022191	Electronic Service	No	OFF_SL_13-599_13-599
Marie	Doyle	marie.doyle@centerpointen ergy.com	CenterPoint Energy	505 Nicollet Mall P O Box 59038 Minneapolis, MN 554590038	Electronic Service	No	OFF_SL_13-599_13-599
Sharon	Ferguson	sharon.ferguson@state.mn .us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 551012198	Electronic Service	No	OFF_SL_13-599_13-599
Bruce	Gerhardson	bgerhardson@otpco.com	Otter Tail Power Company	PO Box 496 215 S Cascade St Fergus Falls, MN 565380496	Electronic Service	No	OFF_SL_13-599_13-599
Adam	Heinen	aheinen@dakotaelectric.co m	Dakota Electric Association	4300 220th St W Farmington, MN 55024	Electronic Service	No	OFF_SL_13-599_13-599
Samantha	Norris	samanthanorris@alliantene rgy.com	Interstate Power and Light Company	200 1st Street SE PO Box 351 Cedar Rapids, IA 524060351	Electronic Service	No	OFF_SL_13-599_13-599
Leann	Oehlerking Boes	lboes@mnpower.com	Minnesota Power	30 W Superior St Duluth, MN 55802	Electronic Service	No	OFF_SL_13-599_13-599
Generic Notice	Residential Utilities Division	residential.utilities@ag.stat e.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_13-599_13-599
Christine	Schwartz	Regulatory.records@xcele nergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_13-599_13-599

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th PI E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_13-599_13-599
Stuart	Tommerdahl	stommerdahl@otpco.com	Otter Tail Power Company	215 S Cascade St PO Box 496 Fergus Falls, MN 56537	Electronic Service	No	OFF_SL_13-599_13-599
Robyn	Woeste	robynwoeste@alliantenerg y.com	Interstate Power and Light Company	200 First St SE Cedar Rapids, IA 52401	Electronic Service	No	OFF_SL_13-599_13-599

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Alison C	Archer	aarcher@misoenergy.org	MISO	2985 Ames Crossing Rd Eagan, MN 55121	Electronic Service	No	OFF_SL_13-868_Official
Mara	Ascheman	mara.k.ascheman@xcelen ergy.com	Xcel Energy	414 Nicollet Mall FI 5 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_13-868_Official
James J.	Bertrand	james.bertrand@stinson.co m	STINSON LLP	50 S 6th St Ste 2600 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_13-868_Official
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	Yes	OFF_SL_13-868_Official
John	Coffman	john@johncoffman.net	AARP	871 Tuxedo Blvd. St, Louis, MO 63119-2044	Electronic Service	No	OFF_SL_13-868_Official
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.st ate.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_13-868_Official
Brooke	Cooper	bcooper@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022191	Electronic Service	No	OFF_SL_13-868_Official
James	Denniston	james.r.denniston@xcelen ergy.com	Xcel Energy Services, Inc.	414 Nicollet Mall, 401-8 Minneapolis, MN 55401	Electronic Service	Yes	OFF_SL_13-868_Official
Sharon	Ferguson	sharon.ferguson@state.mn .us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 551012198	Electronic Service	No	OFF_SL_13-868_Official
Adam	Heinen	aheinen@dakotaelectric.co m	Dakota Electric Association	4300 220th St W Farmington, MN 55024	Electronic Service	No	OFF_SL_13-868_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Michael	Норре	lu23@ibew23.org	Local Union 23, I.B.E.W.	445 Etna Street Ste. 61 St. Paul, MN 55106	Electronic Service	No	OFF_SL_13-868_Official
Alan	Jenkins	aj@jenkinsatlaw.com	Jenkins at Law	2950 Yellowtail Ave. Marathon, FL 33050	Electronic Service	No	OFF_SL_13-868_Official
Richard	Johnson	Rick.Johnson@lawmoss.co m	Moss & Barnett	150 S. 5th Street Suite 1200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_13-868_Official
Sarah	Johnson Phillips	sarah.phillips@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_13-868_Official
Thomas	Koehler	TGK@IBEW160.org	Local Union #160, IBEW	2909 Anthony Ln St Anthony Village, MN 55418-3238	Electronic Service	No	OFF_SL_13-868_Official
Peder	Larson	plarson@larkinhoffman.co m	Larkin Hoffman Daly & Lindgren, Ltd.	8300 Norman Center Drive Suite 1000 Bloomington, MN 55437	Electronic Service	No	OFF_SL_13-868_Official
Pam	Marshall	pam@energycents.org	Energy CENTS Coalition	823 7th St E St. Paul, MN 55106	Electronic Service	No	OFF_SL_13-868_Official
Mary	Martinka	mary.a.martinka@xcelener gy.com	Xcel Energy Inc	414 Nicollet Mall 7th Floor Minneapolis, MN 55401	Electronic Service	Yes	OFF_SL_13-868_Official
Brian	Meloy	brian.meloy@stinson.com	STINSON LLP	50 S 6th St Ste 2600 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_13-868_Official
David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022093	Electronic Service	No	OFF_SL_13-868_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Andrew	Moratzka	andrew.moratzka@stoel.co m	Stoel Rives LLP	33 South Sixth St Ste 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_13-868_Official
David	Niles	david.niles@avantenergy.c om	Minnesota Municipal Power Agency	220 South Sixth Street Suite 1300 Minneapolis, Minnesota 55402	Electronic Service	No	OFF_SL_13-868_Official
Generic Notice	Residential Utilities Division	residential.utilities@ag.stat e.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_13-868_Official
Kevin	Reuther	kreuther@mncenter.org	MN Center for Environmental Advocacy	26 E Exchange St, Ste 206 St. Paul, MN 551011667	Electronic Service	No	OFF_SL_13-868_Official
Richard	Savelkoul	rsavelkoul@martinsquires.c om	Martin & Squires, P.A.	332 Minnesota Street Ste W2750 St. Paul, MN 55101	Electronic Service	No	OFF_SL_13-868_Official
Christine	Schwartz	Regulatory.records@xcele nergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	Yes	OFF_SL_13-868_Official
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th PI E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_13-868_Official
Janet	Shaddix Elling	jshaddix@janetshaddix.co m	Shaddix And Associates	7400 Lyndale Ave S Ste 190 Richfield, MN 55423	Electronic Service	Yes	OFF_SL_13-868_Official
Ken	Smith	ken.smith@districtenergy.c om	District Energy St. Paul Inc.	76 W Kellogg Blvd St. Paul, MN 55102	Electronic Service	No	OFF_SL_13-868_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Byron E.	Starns	byron.starns@stinson.com	STINSON LLP	50 S 6th St Ste 2600 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_13-868_Official
James M	Strommen	jstrommen@kennedy- graven.com	Kennedy & Graven, Chartered	150 S 5th St Ste 700 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_13-868_Official
Eric	Swanson	eswanson@winthrop.com	Winthrop & Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_13-868_Official
Lisa	Veith	lisa.veith@ci.stpaul.mn.us	City of St. Paul	400 City Hall and Courthouse 15 West Kellogg Blvd. St. Paul, MN 55102	Electronic Service	No	OFF_SL_13-868_Official
Samantha	Williams	swilliams@nrdc.org	Natural Resources Defense Council	20 N. Wacker Drive Ste 1600 Chicago, IL 60606	Electronic Service	No	OFF_SL_13-868_Official
Patrick	Zomer	Pat.Zomer@lawmoss.com	Moss & Barnett PA	150 S 5th St #1200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_13-868_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.st ate.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_14- 579_OFF_SL_14-579_AA- 14-579
Brooke	Cooper	bcooper@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022191	Electronic Service	No	OFF_SL_14- 579_OFF_SL_14-579_AA- 14-579
Marie	Doyle	marie.doyle@centerpointen ergy.com	CenterPoint Energy	505 Nicollet Mall P O Box 59038 Minneapolis, MN 554590038	Electronic Service	No	OFF_SL_14- 579_OFF_SL_14-579_AA- 14-579
Sharon	Ferguson	sharon.ferguson@state.mn .us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 551012198	Electronic Service	No	OFF_SL_14- 579_OFF_SL_14-579_AA- 14-579
Bruce	Gerhardson	bgerhardson@otpco.com	Otter Tail Power Company	PO Box 496 215 S Cascade St Fergus Falls, MN 565380496	Electronic Service	No	OFF_SL_14- 579_OFF_SL_14-579_AA- 14-579
Adam	Heinen	aheinen@dakotaelectric.co m	Dakota Electric Association	4300 220th St W Farmington, MN 55024	Electronic Service	No	OFF_SL_14- 579_OFF_SL_14-579_AA- 14-579
Sarah	Johnson Phillips	sarah.phillips@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_14- 579_OFF_SL_14-579_AA- 14-579
Samantha	Norris	samanthanorris@alliantene rgy.com	Interstate Power and Light Company	200 1st Street SE PO Box 351 Cedar Rapids, IA 524060351	Electronic Service	No	OFF_SL_14- 579_OFF_SL_14-579_AA- 14-579
Leann	Oehlerking Boes	lboes@mnpower.com	Minnesota Power	30 W Superior St Duluth, MN 55802	Electronic Service	No	OFF_SL_14- 579_OFF_SL_14-579_AA- 14-579
Generic Notice	Residential Utilities Division	residential.utilities@ag.stat e.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_14- 579_OFF_SL_14-579_AA- 14-579

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Christine	Schwartz	Regulatory.records@xcele nergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_14- 579_OFF_SL_14-579_AA- 14-579
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th PI E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_14- 579_OFF_SL_14-579_AA- 14-579
Stuart	Tommerdahl	stommerdahl@otpco.com	Otter Tail Power Company	215 S Cascade St PO Box 496 Fergus Falls, MN 56537	Electronic Service	No	OFF_SL_14- 579_OFF_SL_14-579_AA- 14-579
Robyn	Woeste	robynwoeste@alliantenerg y.com	Interstate Power and Light Company	200 First St SE Cedar Rapids, IA 52401	Electronic Service	No	OFF_SL_14- 579_OFF_SL_14-579_AA- 14-579

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.st ate.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_16-523_AA16- 523
Brooke	Cooper	bcooper@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022191	Electronic Service	No	OFF_SL_16-523_AA16- 523
Marie	Doyle	marie.doyle@centerpointen ergy.com	CenterPoint Energy	505 Nicollet Mall P O Box 59038 Minneapolis, MN 554590038	Electronic Service	No	OFF_SL_16-523_AA16- 523
Sharon	Ferguson	sharon.ferguson@state.mn .us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 551012198	Electronic Service	No	OFF_SL_16-523_AA16- 523
Bruce	Gerhardson	bgerhardson@otpco.com	Otter Tail Power Company	PO Box 496 215 S Cascade St Fergus Falls, MN 565380496	Electronic Service	No	OFF_SL_16-523_AA16- 523
Adam	Heinen	aheinen@dakotaelectric.co m	Dakota Electric Association	4300 220th St W Farmington, MN 55024	Electronic Service	No	OFF_SL_16-523_AA16- 523
Samantha	Norris	samanthanorris@alliantene rgy.com	Interstate Power and Light Company	200 1st Street SE PO Box 351 Cedar Rapids, IA 524060351	Electronic Service	No	OFF_SL_16-523_AA16- 523
Leann	Oehlerking Boes	lboes@mnpower.com	Minnesota Power	30 W Superior St Duluth, MN 55802	Electronic Service	No	OFF_SL_16-523_AA16- 523
Catherine	Phillips	Catherine.Phillips@wecene rgygroup.com	Minnesota Energy Resources	231 West Michigan St Milwaukee, WI 53203	Electronic Service	No	OFF_SL_16-523_AA16- 523
Generic Notice	Residential Utilities Division	residential.utilities@ag.stat e.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_16-523_AA16- 523

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Christine	Schwartz	Regulatory.records@xcele nergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_16-523_AA16- 523
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th PI E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_16-523_AA16- 523
Richard	Stasik	richard.stasik@wecenergyg roup.com	Minnesota Energy Resources Corporation (HOLDING)	231 West Michigan St - P321 Milwaukee, WI 53203	Electronic Service	No	OFF_SL_16-523_AA16- 523
Stuart	Tommerdahl	stommerdahl@otpco.com	Otter Tail Power Company	215 S Cascade St PO Box 496 Fergus Falls, MN 56537	Electronic Service	No	OFF_SL_16-523_AA16- 523
Robyn	Woeste	robynwoeste@alliantenerg y.com	Interstate Power and Light Company	200 First St SE Cedar Rapids, IA 52401	Electronic Service	No	OFF_SL_16-523_AA16- 523

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Derek	Bertsch	derek.bertsch@mrenergy.c om	Missouri River Energy Services	3724 West Avera Drive PO Box 88920 Sioux Falls, SD 57109-8920	Electronic Service	No	OFF_SL_17- 492_OFF_SL_17-492_AA- 17-492
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.st ate.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_17- 492_OFF_SL_17-492_AA- 17-492
Brooke	Cooper	bcooper@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022191	Electronic Service	No	OFF_SL_17- 492_OFF_SL_17-492_AA- 17-492
Marie	Doyle	marie.doyle@centerpointen ergy.com	CenterPoint Energy	505 Nicollet Mall P O Box 59038 Minneapolis, MN 554590038	Electronic Service	No	OFF_SL_17- 492_OFF_SL_17-492_AA- 17-492
Sharon	Ferguson	sharon.ferguson@state.mn .us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 551012198	Electronic Service	No	OFF_SL_17- 492_OFF_SL_17-492_AA- 17-492
Bruce	Gerhardson	bgerhardson@otpco.com	Otter Tail Power Company	PO Box 496 215 S Cascade St Fergus Falls, MN 565380496	Electronic Service	No	OFF_SL_17- 492_OFF_SL_17-492_AA- 17-492
Adam	Heinen	aheinen@dakotaelectric.co m	Dakota Electric Association	4300 220th St W Farmington, MN 55024	Electronic Service	No	OFF_SL_17- 492_OFF_SL_17-492_AA- 17-492
Samantha	Norris	samanthanorris@alliantene rgy.com	Interstate Power and Light Company	200 1st Street SE PO Box 351 Cedar Rapids, IA 524060351	Electronic Service	No	OFF_SL_17- 492_OFF_SL_17-492_AA- 17-492
Leann	Oehlerking Boes	lboes@mnpower.com	Minnesota Power	30 W Superior St Duluth, MN 55802	Electronic Service	No	OFF_SL_17- 492_OFF_SL_17-492_AA- 17-492
Catherine	Phillips	Catherine.Phillips@wecene rgygroup.com	Minnesota Energy Resources	231 West Michigan St Milwaukee, WI 53203	Electronic Service	No	OFF_SL_17- 492_OFF_SL_17-492_AA- 17-492

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Generic Notice	Residential Utilities Division	residential.utilities@ag.stat e.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_17- 492_OFF_SL_17-492_AA- 17-492
Isabel	Ricker	ricker@fresh-energy.org	Fresh Energy	408 Saint Peter Street Suite 220 Saint Paul, MN 55102	Electronic Service	No	OFF_SL_17- 492_OFF_SL_17-492_AA- 17-492
Christine	Schwartz	Regulatory.records@xcele nergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_17- 492_OFF_SL_17-492_AA- 17-492
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th PI E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_17- 492_OFF_SL_17-492_AA- 17-492
Richard	Stasik	richard.stasik@wecenergyg roup.com	Minnesota Energy Resources Corporation (HOLDING)	231 West Michigan St - P321 Milwaukee, WI 53203	Electronic Service	No	OFF_SL_17- 492_OFF_SL_17-492_AA- 17-492
Kristin	Stastny	kstastny@taftlaw.com	Taft Stettinius & Hollister LLP	2200 IDS Center 80 South 8th St Minneapolis, MN 55402	Electronic Service	No	OFF_SL_17- 492_OFF_SL_17-492_AA- 17-492
Stuart	Tommerdahl	stommerdahl@otpco.com	Otter Tail Power Company	215 S Cascade St PO Box 496 Fergus Falls, MN 56537	Electronic Service	No	OFF_SL_17- 492_OFF_SL_17-492_AA- 17-492
Robyn	Woeste	robynwoeste@alliantenerg y.com	Interstate Power and Light Company	200 First St SE Cedar Rapids, IA 52401	Electronic Service	No	OFF_SL_17- 492_OFF_SL_17-492_AA- 17-492

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Derek	Bertsch	derek.bertsch@mrenergy.c om	Missouri River Energy Services	3724 West Avera Drive PO Box 88920 Sioux Falls, SD 57109-8920	Electronic Service	No	OFF_SL_18-373_AA -18- 373
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.st ate.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_18-373_AA -18- 373
Brooke	Cooper	bcooper@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022191	Electronic Service	No	OFF_SL_18-373_AA -18- 373
Marie	Doyle	marie.doyle@centerpointen ergy.com	CenterPoint Energy	505 Nicollet Mall P O Box 59038 Minneapolis, MN 554590038	Electronic Service	No	OFF_SL_18-373_AA -18- 373
Sharon	Ferguson	sharon.ferguson@state.mn .us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 551012198	Electronic Service	No	OFF_SL_18-373_AA -18- 373
Bruce	Gerhardson	bgerhardson@otpco.com	Otter Tail Power Company	PO Box 496 215 S Cascade St Fergus Falls, MN 565380496	Electronic Service	No	OFF_SL_18-373_AA -18- 373
Adam	Heinen	aheinen@dakotaelectric.co m	Dakota Electric Association	4300 220th St W Farmington, MN 55024	Electronic Service	No	OFF_SL_18-373_AA -18- 373
Samantha	Norris	samanthanorris@alliantene rgy.com	Interstate Power and Light Company	200 1st Street SE PO Box 351 Cedar Rapids, IA 524060351	Electronic Service	No	OFF_SL_18-373_AA -18- 373
Ann	O'Reilly	ann.oreilly@state.mn.us	Office of Administrative Hearings	PO Box 64620 St. Paul, MN 55101	Electronic Service	No	OFF_SL_18-373_AA -18- 373
Leann	Oehlerking Boes	lboes@mnpower.com	Minnesota Power	30 W Superior St Duluth, MN 55802	Electronic Service	No	OFF_SL_18-373_AA -18- 373

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Catherine	Phillips	Catherine.Phillips@wecene rgygroup.com	Minnesota Energy Resources	231 West Michigan St Milwaukee, WI 53203	Electronic Service	No	OFF_SL_18-373_AA -18- 373
Generic Notice	Residential Utilities Division	residential.utilities@ag.stat e.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_18-373_AA -18- 373
Isabel	Ricker	ricker@fresh-energy.org	Fresh Energy	408 Saint Peter Street Suite 220 Saint Paul, MN 55102	Electronic Service	No	OFF_SL_18-373_AA -18- 373
Christine	Schwartz	Regulatory.records@xcele nergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_18-373_AA -18- 373
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th PI E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_18-373_AA -18- 373
Richard	Stasik	richard.stasik@wecenergyg roup.com	Minnesota Energy Resources Corporation (HOLDING)	231 West Michigan St - P321 Milwaukee, WI 53203	Electronic Service	No	OFF_SL_18-373_AA -18- 373
Kristin	Stastny	kstastny@taftlaw.com	Taft Stettinius & Hollister LLP	2200 IDS Center 80 South 8th St Minneapolis, MN 55402	Electronic Service	No	OFF_SL_18-373_AA -18- 373
Stuart	Tommerdahl	stommerdahl@otpco.com	Otter Tail Power Company	215 S Cascade St PO Box 496 Fergus Falls, MN 56537	Electronic Service	No	OFF_SL_18-373_AA -18- 373
Robyn	Woeste	robynwoeste@alliantenerg y.com	Interstate Power and Light Company	200 First St SE Cedar Rapids, IA 52401	Electronic Service	No	OFF_SL_18-373_AA -18- 373