

November 18, 2025

Sasha Bergman
Executive Secretary
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. E017/M-23-380

Dear Ms. Bergman,

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

In the Matter of Otter Tail Power Company's 2023 Integrated Distribution Plan.

The Petition was filed by Otter Tail Power Company (Otter Tail or the Company) on October 3, 2025.

The Department recommends approval and is available to answer any questions the Minnesota Public Utilities Commission may have.

Sincerely,

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

RW/AF/ar
Attachment



Before the Minnesota Public Utilities Commission

Comments of the Minnesota Department of Commerce

Docket No. E017/M-23-380

I. INTRODUCTION

OTP filed its Petition for approval of a new Electric Vehicle Charging Rider (EVCR) and the corresponding tariff (Petition) on October 3, 2025. The Company also proposes to recover the Company's investments and expenses related to its proposed EVCR within its Energy Conservation Optimization Program (ECO).¹ OTP states the program will offer an additional option for EV customers interested in participating in its demand control programs.² The Company states EVCR is designed to reduce both upfront installation costs and ongoing electricity bills for participants; OTP states the EVCR will allow the Company to actively manage EV charger operation during periods of high economic and Midcontinent Independent System Operator (MISO) system capacity costs to enhance grid reliability and efficiency.³

The Company states that the proposed EVCR is designed to target customers with a Level 2 EV charger that only have one residential or farm service meter at their residence. The Company will install a load control switch for customers participating in the EVCR rate. The customer will be required to connect any EV charger on the premise to the Company-provided load control switch to ensure that EV charging ceases when signaled.⁴ The Company's load control switch would be dedicated to the customer's EV and will not impact any other customer equipment on the premise.⁵

II. PROCEDURAL BACKGROUND

- | | |
|------------------|--|
| October 3, 2025 | Otter Tail Power Company filed its Petition for approval of a new Electric Vehicle Charging Rider and the corresponding tariff. OTP proposes to recover costs and investments related to EVCR through ECO. ⁶ |
| October 15, 2025 | The Commission files its Notice of Comment Period in the present docket to address the issue of "Should the Commission approve Otter Tail Power Company's (Otter Tail Power) petition for a new Electric Vehicle Credit Rider (EVCR) and the corresponding tariff?" ⁷ |

¹ *In the Matter of Otter Tail Power Company's 2023 Integrated Distribution Plan*, OTP Petition for Approval of new Electric Vehicle Charging Rider, October 3, 2025, Docket No. E017/M-23-380, (eDockets) [202510-223593-01](#) (hereinafter "Petition") at 1.

² *Id.*, at 2.

³ *Ibid.*

⁴ *Id.*, at 5.

⁵ *Ibid.*

⁶ Petition.

⁷ *In the Matter of Otter Tail Power Company's 2023 Integrated Distribution Plan*, Notice of Comment Period, October 15, 2025, Docket No. E017/M-23-380, (eDockets) [202510-223935-01](#) (hereinafter "Notice").

Topic(s) open for comment:

- Should the Commission approve Otter Tail Power’s proposed EVCR?
- Should the Commission approve Otter Tail Power’s proposed tariff pages implementing the EVCR?
- Are there any concerns with Otter Tail Power’s proposal to recover costs relating to the EVCR through the Energy Conservation Optimization (ECO) Program and the corresponding rider?
- Are there other issues or concerns related to this matter?

III. DEPARTMENT ANALYSIS

A. OTP’S EVCR

The Department responds to the following notice topic:

Should the Commission approve Otter Tail Power’s proposed EVCR?

A.1. Goals for the Proposed Program

OTP states that its proposed program is intended to accomplish two goals of Minnesota’s energy policy: 1) supporting EVs, and 2) expanding the Company’s load management offerings.⁸ The Company states that its proposed program mitigates the Company’s purchasing higher-priced energy and capacity for customers charging EVs and also reduces the costs for the customer to charge their EV.⁹ OTP states that its proposal “aligns with its commitment to continually assess barriers to EV adoption and provide holistic customer offerings from the initial vehicle purchase to efficient charging and the final driving experience.”¹⁰

The Company explains the importance of load management programs in general:

As intermittent renewable generation increasingly contributes to the energy mix, local marginal pricing can swing considerably, and the timing of cost-effective electricity usage now varies significantly from day to day. Concurrently, transmission and distribution systems may encounter capacity constraints during periods of elevated demand. To mitigate these challenges, customer participation in direct demand control rate programs is becoming vital. Participation in these programs enables the Company to strategically manage system loads, particularly flexible demand like electric vehicle charging, by shifting usage to more economic and operationally favorable hours. The ability to dynamically manage loads not

⁸ Petition at 4-5.

⁹ *Ibid.*

¹⁰ *Ibid.*

only enhances grid reliability and efficiency but also supports broader policy goals around decarbonization, efficiency, and cost containment.¹¹

OTP states that several of its demand control programs require two service meters, its EVCR is designed to target customers who only have one residential or farm service meter at their residence. The Company discusses that there is a subset of customers that may be deterred from installing a second off-peak service or switching to a time-of-day rate given, for example, their heating/cooling equipment, their estimated usage, or the installation costs of the second service. OTP states its proposal aims to support this subset of customers in shifting their EV charging to more economical periods, thus helping to optimize system efficiency and reduce overall costs for all ratepayers. Moreover, OTP states, customers participating in the program would receive a monthly credit, reducing their overall energy costs for EV charging.¹²

A.2. Evaluating OTP's Proposal

A.2.1. Fair return of and on utility investment

In evaluating rates, the Department utilizes four standard rate design principles based in the statutory provisions concerning rate changes. Each principle is addressed in turn below. The animating statute of these principles, Minn. Stat. § 216B.16, subd. 4, states that “[t]he burden of proof to show that the rate change is just and reasonable shall be upon the public utility seeking the change.”¹³

Minn. Stat. § 216B.16, subd. 6 provides the factors to be considered by the Commission:

Subd. 6. Factors considered, generally. The commission, in the exercise of its powers under this chapter to determine just and reasonable rates for public utilities, shall give due consideration to the public need for adequate, efficient, and reasonable service and to the need of the public utility for revenue sufficient to enable it to meet the cost of furnishing the service, including adequate provision for depreciation of its utility property used and useful in rendering service to the public, and to earn a fair and reasonable return upon the investment in such property. In determining the rate base upon which the utility is to be allowed to earn a fair rate of return, the commission shall give due consideration to evidence of the cost of the property when first devoted to public use, to prudent acquisition cost to the public utility less appropriate depreciation on each, to construction work in progress, to offsets in the nature of capital provided by sources other than the investors, and to other expenses of a capital nature. For purposes of determining rate base, the commission shall consider the original cost of utility property included in the base and shall make no allowance for its estimated current replacement value. If the commission orders a generating facility to terminate its operations before

¹¹ Petition at 5.

¹² *Ibid.*

¹³ [Minn. Stat. §216B.16, subd. 4.](#)

the end of the facility's physical life in order to comply with a specific state or federal energy statute or policy, the commission may allow the public utility to recover any positive net book value of the facility as determined by the commission.¹⁴

First, as provided in Minn. Stat. § 216.16, subd. 6, rates should allow a utility a fair return of an on its investment. Here, the Company proposes to track and recover costs through the ECO program and its applicable ECO Rider.¹⁵ If OTP's petition is approved, the Company will file an ECO modification and submit a proposed budget to administer the program and a cost-effectiveness evaluation.¹⁶ The Department will review the ECO modification, the program budget, and the cost effectiveness at the time of filing.

A.2.2. Reasonable and not unreasonably discriminatory

Additionally, Minn. Stat. §§ 216B.03 and 216B.07 require rates to be reasonable and to not be unreasonably discriminatory.¹⁷ OTP states that it developed the proposed EVCR utilizing the Company's 2025 Marginal Cost Study (MCS), the standard residential rate approved in the Company's 2020 Minnesota rate case, and Minnesota EV load profiles with the goal of providing reasonable compensation to customers that elect to participate.¹⁸ The customer would agree to allow OTP to control their EV charging for up to twelve hours per day, with no annual maximum control hours.¹⁹

To establish the credit, the Company began with an analysis of the MCS, which groups hourly costs into three time-of-day categories for each season: on-peak, mid-peak, and off-peak; the company designed the program to call events in the mid-peak and on-peak periods to place the majority of EV charging in the off-peak and lowest-cost hours.²⁰ The Company states it compared the standard residential rate to the average off-peak marginal cost from the MCS and the difference between the two values represents the savings associated with controlled EV charging during the off-peak hours.²¹ The savings identified would be returned to customers as an on-bill credit.²²

OTP describes its calculations for its proposed credit stating:

Assuming the typical monthly usage of 504 kWh for a single EV customer, the calculation resulted in slightly over \$9.00 in savings, which serves as the basis for the proposed \$9.00 bill credit. In order to design a credit for homes with multiple EVs, the Company utilized data reported by the U.S. Energy Information Administration that concludes a second EV in a home is driven only 47.95% of the miles driven by the primary vehicle. Applying

¹⁴ [Minn. Stat. § 216B.16, subd. 6.](#)

¹⁵ Petition at 7.

¹⁶ *Ibid.*

¹⁷ [Minn. Stat. § 216B.03](#) and [Minn. Stat. § 216B.07.](#)

¹⁸ Petition at 6.

¹⁹ *Ibid.*

²⁰ *Ibid.*

²¹ *Ibid.*

²² *Ibid.*

this assumption to the 504 kWh of monthly charging for a single EV results in an expected 745 kWh average monthly charging usage for households with multiple EVs. Using the same calculation process as the single vehicle credit this produced a proposed monthly credit of \$13.00 for multi-EV households.²³

The Department concludes the calculation of the credit is reasonable.

Moreover, OTP proposed program expands access to managed EV charging for customers without a second service, thereby reducing the barrier for EV owners to participate in load management initiatives. The Department concludes the proposed program is not unduly discriminatory.

A.2.3. Energy Conservation and Use of Renewables

Minn. Stat. §§ 216B.03 and 216C.05 encourage rate design that favors energy conservation and the use of renewable energy.²⁴ In its Petition, OTP explains the importance of load management programs generally and EV load control specifically:

As intermittent renewable generation increasingly contributes to the energy mix, local marginal pricing can swing considerably, and the timing of cost-effective electricity usage now varies significantly from day to day. Concurrently, transmission and distribution systems may encounter capacity constraints during periods of elevated demand. To mitigate these challenges, customer participation in direct demand control rate programs is becoming vital. Participation in these programs enables the Company to strategically manage system loads, particularly flexible demand like electric vehicle charging, by shifting usage to more economic and operationally favorable hours. The ability to dynamically manage loads not only enhances grid reliability and efficiency but also supports broader policy goals around decarbonization, efficiency, and cost containment.²⁵

The Department agrees with the importance of load control programs to manage cost-effective electricity pricing and mitigating transmission and distribution system constraints. The Department concludes that the program fulfils this requirement of this statute subsection.

A.2.4. Reasonableness resolved in favor of consumer

Minn. Stat. § 216B.03 also requires that any doubt as to reasonableness be resolved in favor of the consumer.²⁶ The Company states that its proposed program is voluntary and available to customers on the standard residential or farm rate that have hardwired Level 2 EV charger(s) installed at their residence. Participants on the rate must show proof of EV ownership and are responsible for informing

²³ Petition at 6.

²⁴ [Minn. Stat. § 216B.03](#) and [Minn. Stat. § 216C.05](#).

²⁵ Petition at 5.

²⁶ [Minn. Stat. § 216B.03](#)

the Company if they no longer own an EV.²⁷ Participants agree to controlled service and although the Company is not offering an event opt-out at this time, the voluntary nature of the rate would allow a customer to leave the rate if wanted. The Department concludes that the EVCR meets this criterion.

A.3. *Completeness*

Finally, Minn. R. 7829.0100, subp. 11 defines a “miscellaneous filing,” which is applicable here because a determination of the Company’s revenue requirement is not necessary:²⁸

A miscellaneous filing includes a filing involving a new service offering; a change in a utility's rates, services, terms, or conditions of service; a change in a utility's corporate structure, assigned service area, or capital structure, when conducted separately from a general rate proceeding; filings made under the rules governing automatic adjustment of charges in chapter 7825; or any related matter.

The inclusion of a particular type of filing in this list does not require a filing that would not otherwise be required or confer jurisdiction that would not otherwise be present.²⁹

Minn. R. 7829.1300 outlines the completeness requirements for a miscellaneous filing including a one-paragraph summary of the filing, service requirements, and requirements for the content included in the filing.³⁰ The Department reviewed the Petition for compliance with the completeness requirements therein and concludes that the petition is complete.

A.4. *Response to Notice Topic*

The Department recommends the Commission approve OTP’s EVCR program.

B. *TARIFF PAGES*

The Department responds to the following notice topic:

Should the Commission approve Otter Tail Power’s proposed tariff pages implementing the EVCR?

The Department has reviewed the Company’s proposed tariff pages and finds the proposed pages to be consistent with the Company’s proposal as described in the Petition. The Department recommends the Commission approve the Company’s proposed tariff pages.

²⁷ Petition at 7.

²⁸ [Minn. R. 7829.0100 subp. 11](#)

²⁹ *Ibid.*

³⁰ [Minn. R. 7829.1300](#)

C. COST RECOVERY

The Department responds to the following notice topic:

Are there any concerns with Otter Tail Power's proposal to recover costs relating to the EVCR through the Energy Conservation Optimization (ECO) Program and the corresponding rider?

Assuming the Company meets all of the necessary statutory requirements necessary for introducing a new program into its ECO portfolio, the Department does not have any concerns with the Company's proposal to implement EVCR and recover costs through ECO.

D. OTHER ISSUES

The Department responds to the following notice topic:

Are there other issues or concerns related to this matter?

D.1. Opt-out capability

Currently, the Company is not proposing to include an event opt-out capability in its program due to system limitations.³¹ OTP states that not offering an event opt-out capability will allow for broader engagement from participants and allow better tracking of new EV-related loads.³² The control event durations, states OTP, are designed to be short and flexible enough to ensure customers are receiving adequate charging without issues; Most control periods will last between 1- 3 hours but might last longer during emergency MISO periods.³³

The Department agrees that not including an event opt-out will allow for greater levels of participation and thus, more load control capability. However, without an event opt-out, agreeing to controlled charging for up to 12 hours a day without an annual limit on a number of control events or control hours may be daunting for customers. Further, the Department understands that the rate is voluntary, but imperfect usage of the rate (opting out of a control event occasionally) is an improvement compared to not having a customer on the rate at all. The Department recommends OTP further investigate the feasibility of adding an opt-out capability to its rate design in the future and provide additional detail on its "system limitations"³⁴ and a timeline for when the opt-out capability could be implemented.

³¹ *Id.*, at 7.

³² *Ibid.*

³³ *Ibid.*

³⁴ Petition at 7.

D.2. Rider versus Voluntary Tariff

At the Commission’s November 6, 2025 Agenda Meeting, in discussing OTP’s Thermal Market Energy Pricing rider,³⁵ Commissioners asked OTP to revise its legacy use of the term “rider.” The Commission discussed that the Company’s use of “rider” in Docket No. E017/M-25-253 was confusing given the Company was requesting approval of a voluntary tariff. The Company indicated that the use of “rider” is a legacy use of the term that had been utilized to denote a tariff that was on top of a rate, and the Company intends to move away from its legacy use of “rider” in the future. The Commission requested OTP revise its tariff book in its next rate case.³⁶

The Department notes that the present petition also utilizes the Company’s legacy title of “rider” and will require the same revision.

IV. DEPARTMENT RECOMMENDATIONS

Based on analysis of OTP’s proposal and the information in the record, the Department has prepared recommendations, which are provided below. The recommendations correspond to the subheadings of Section III above.

A. OTP EVCR

- The Department recommends the Commission approve OTP’s EVCR.

B. TARIFF PAGES

- The Department recommends the Commission approve the Company’s proposed tariff pages.

D. OTHER ISSUES

- D.1. The Department recommends OTP further investigate the feasibility of adding an opt-out capability to its rate design in the future and provide additional detail on its “system limitations”³⁷ and a timeline for when the opt-out capability could be implemented.

³⁵ *In the Matter of Otter Tail Power Co.’s Petition for Approval of a Thermal Technology Market Energy Rate Section 14.16*, Otter Tail Initial Petition, Docket No. E017/M-25-253, (eDockets) [20256-219675-01](#).

³⁶ [PUC Agenda Meeting on 2025-11-06 at 10 AM](#) starting at minute 14:57.

³⁷ Petition at 7.

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. E017/M-23-380

Dated this **18th** 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
1	Michael	Allen	michael.allen@allenergysolar.com	All Energy Solar		721 W 26th st Suite 211 Minneapolis MN, 55405 United States	Electronic Service		No	23-380Official 23-380
2	Ellen	Anderson	ellena@umn.edu	325 Learning and Environmental Sciences		1954 Buford Ave Saint Paul MN, 55108 United States	Electronic Service		No	23-380Official 23-380
3	Jay	Anderson	jaya@cmpas.org	CMPAS		7550 Corporate Way Suite 100 Eden Prairie MN, 55344 United States	Electronic Service		No	23-380Official 23-380
4	MK	Anderson	anderson@fresh-energy.org	Fresh Energy		408 St Peter Street Saint Paul MN, 55102 United States	Electronic Service		No	23-380Official 23-380
5	Donna	Attanasio	dattanasio@gwu.edu	George Washington University		2000 H Street NW Washington DC, 20052 United States	Electronic Service		No	23-380Official 23-380
6	John	Bailey	bailey@ilsr.org	Institute For Local Self-Reliance		1313 5th St SE Ste 303 Minneapolis MN, 55414 United States	Electronic Service		No	23-380Official 23-380
7	Mark	Bakk	mbakk@lcp.coop	Lake Country Power		26039 Bear Ridge Drive Cohasset MN, 55721 United States	Electronic Service		No	23-380Official 23-380
8	Sasha	Bergman	sasha.bergman@state.mn.us		Public Utilities Commission		Electronic Service		No	23-380Official 23-380
9	Derek	Bertsch	derek.bertsch@mrenergy.com	Missouri River Energy Services		3724 West Avera Drive PO Box 88920 Sioux Falls SD, 57109-8920 United States	Electronic Service		No	23-380Official 23-380
10	William	Black	bblack@mmua.org	MMUA		Suite 200 3131 Fernbrook Lane North Plymouth MN, 55447 United States	Electronic Service		No	23-380Official 23-380
11	Kenneth	Bradley	kbradley@environmentminnesota.org			2837 Emerson Ave S Apt CW112 Minneapolis MN, 55408 United States	Electronic Service		No	23-380Official 23-380
12	Jon	Brekke	jbrekke@greenergy.com	Great River Energy		12300 Elm Creek Boulevard Maple Grove MN, 55369-4718 United States	Electronic Service		No	23-380Official 23-380
13	Sydney R.	Briggs	sbriggs@swce.coop	Steele-Waseca Cooperative Electric		2411 W. Bridge St PO Box 485 Owatonna MN, 55060-0485 United States	Electronic Service		No	23-380Official 23-380
14	Mark B.	Bring	mbring@otpc.com	Otter Tail Power Company		215 South Cascade Street PO Box 496 Fergus Falls	Electronic Service		No	23-380Official 23-380

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						MN, 56538-0496 United States				
15	Matthew	Brodin	mbrodin@allete.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	23-380Official 23-380
16	Christina	Brusven	cbrusven@fredlaw.com	Fredrikson Byron		60 S 6th St Ste 1500 Minneapolis MN, 55402-4400 United States	Electronic Service		No	23-380Official 23-380
17	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	23-380Official 23-380
18	Douglas M.	Carnival	dcarnival@carnivalberns.com	McGrann Shea Carnival Straughn & Lamb		800 Nicollet Mall Ste 2600 Minneapolis MN, 55402-7035 United States	Electronic Service		No	23-380Official 23-380
19	Ray	Choquette	rchoquette@agp.com	Ag Processing Inc.		12700 West Dodge Road PO Box 2047 Omaha NE, 68103-2047 United States	Electronic Service		No	23-380Official 23-380
20	Kenneth A.	Colburn	kcolburn@symbioticstrategies.com	Symbiotic Strategies, LLC		26 Winton Road Meredith NH, 32535413 United States	Electronic Service		No	23-380Official 23-380
21	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	23-380Official 23-380
22	George	Crocker	gwillc@nawo.org	North American Water Office		5093 Keats Avenue Lake Elmo MN, 55042 United States	Electronic Service		No	23-380Official 23-380
23	Timothy	DenHerder Thomas	timothy@cooperativeenergyfutures.com	Cooperative Energy Futures		3500 Bloomington Ave. S Minneapolis MN, 55407 United States	Electronic Service		No	23-380Official 23-380
24	James	Denniston	james.r.denniston@xcelenergy.com	Xcel Energy Services, Inc.		414 Nicollet Mall, 401-8 Minneapolis MN, 55401 United States	Electronic Service		No	23-380Official 23-380
25	Curt	Dieren	curt.dieren@dgr.com	L&O Power Cooperative		1302 S Union St Rock Rapids IA, 51246 United States	Electronic Service		No	23-380Official 23-380
26	Carlton	Doyle Fontaine	carlon.doyle.fontaine@senate.mn	MN Senate		75 Rev Dr Martin Luther King Jr Blvd Room G-17 St Paul MN, 55155 United States	Electronic Service		No	23-380Official 23-380
27	Kristen	Eide Tollefson	healingsystems69@gmail.com	R-CURE		28477 N Lake Ave Frontenac MN, 55026-1044 United States	Electronic Service		No	23-380Official 23-380

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
28	Bob	Eleff	bob.eleff@house.mn	Regulated Industries Cmte		100 Rev Dr Martin Luther King Jr Blvd Room 600 St. Paul MN, 55155 United States	Electronic Service		No	23-380Official 23-380
29	John	Farrell	jfarrell@ilsr.org	Institute for Local Self-Reliance		2720 E. 22nd St Institute for Local Self-Reliance Minneapolis MN, 55406 United States	Electronic Service		No	23-380Official 23-380
30	Christian	Fenstermacher	christian.fenstermacher@owatonnautilities.com	Owatonna Municipal Public Utilities		PO Box 800 208 S Walnut Ave Owatonna MN, 55060 United States	Electronic Service		No	23-380Official 23-380
31	Sharon	Ferguson	sharon.ferguson@state.mn.us		Department of Commerce	85 7th Place E Ste 280 Saint Paul MN, 55101-2198 United States	Electronic Service		No	23-380Official 23-380
32	Nathan	Franzen	nathan@nationalgridrenewables.com	Geronimo Energy, LLC		8400 Normandale Lake Blvd Ste 1200 Bloomington MN, 55437 United States	Electronic Service		No	23-380Official 23-380
33	Jessica	Fyhrie	jfyhrie@otpc.com	Otter Tail Power Company		PO Box 496 Fergus Falls MN, 56538-0496 United States	Electronic Service		Yes	23-380Official 23-380
34	Edward	Garvey	garveyed@aol.com	Residence		32 Lawton St Saint Paul MN, 55102 United States	Electronic Service		No	23-380Official 23-380
35	Allen	Gleckner	gleckner@fresh-energy.org	Fresh Energy		408 St. Peter Street Ste 350 Saint Paul MN, 55102 United States	Electronic Service		No	23-380Official 23-380
36	Allen	Gleckner	agleckner@elpc.org	Environmental Law & Policy Center		35 E. Wacker Drive, Suite 1600 Suite 1600 Chicago IL, 60601 United States	Electronic Service		No	23-380Official 23-380
37	Jenny	Glumack	jenny@mrea.org	Minnesota Rural Electric Association		11640 73rd Ave N Maple Grove MN, 55369 United States	Electronic Service		No	23-380Official 23-380
38	Nicholas	Haeg	haeg@fresh-energy.org			12298 Bass Trail Sauk Centre MN, 56378 United States	Electronic Service		No	23-380Official 23-380
39	Joe	Halso	joe.halso@sierraclub.org	Sierra Club		1536 Wynkoop St Ste 200 Denver CO, 80202 United States	Electronic Service		No	23-380Official 23-380
40	Todd	Headlee	theadlee@dvigridsolutions.com	Dominion Voltage, Inc.		701 E. Cary Street Richmond VA, 23219 United States	Electronic Service		No	23-380Official 23-380

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
41	Adam	Heinen	aheinen@dakotaelectric.com	Dakota Electric Association		4300 220th St W Farmington MN, 55024 United States	Electronic Service		No	23-380Official 23-380
42	Annete	Henkel	mui@mutilityinvestors.org	Minnesota Utility Investors		413 Wacouta Street #230 St.Paul MN, 55101 United States	Electronic Service		No	23-380Official 23-380
43	Jessy	Hennesy	jessy.hennesy@avantenergy.com	Avant Energy		220 S. Sixth St. Ste 1300 Minneapolis MN, 55402 United States	Electronic Service		No	23-380Official 23-380
44	Joe	Hoffman	ja.hoffman@smmpa.org	SMMPA		500 First Ave SW Rochester MN, 55902-3303 United States	Electronic Service		No	23-380Official 23-380
45	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	23-380Official 23-380
46	Samantha	Houston	shouston@ucsusa.org	Union of Concerned Scientists		1825 K St. NW Ste 800 Washington DC, 20006 United States	Electronic Service		No	23-380Official 23-380
47	Jan	Hubbard	jan.hubbard@comcast.net			7730 Mississippi Lane Brooklyn Park MN, 55444 United States	Electronic Service		No	23-380Official 23-380
48	Casey	Jacobson	cjacobson@becp.com	Basin Electric Power Cooperative		1717 East Interstate Avenue Bismarck ND, 58501 United States	Electronic Service		No	23-380Official 23-380
49	John S.	Jaffray	jjaffray@jrpower.com	JJR Power		350 Highway 7 Suite 236 Excelsior MN, 55331 United States	Electronic Service		No	23-380Official 23-380
50	Alan	Jenkins	aj@jenkinsatlaw.com	Jenkins at Law		2950 Yellowtail Ave. Marathon FL, 33050 United States	Electronic Service		No	23-380Official 23-380
51	Richard	Johnson	rick.johnson@lawmoss.com	Moss & Barnett		150 S. 5th Street Suite 1200 Minneapolis MN, 55402 United States	Electronic Service		No	23-380Official 23-380
52	Nate	Jones	njones@hcpd.com	Heartland Consumers Power		PO Box 248 Madison SD, 57042 United States	Electronic Service		No	23-380Official 23-380
53	Michael	Kampmeyer	mkampmeyer@a-e-group.com	AEG Group, LLC		260 Salem Church Road Sunfish Lake MN, 55118 United States	Electronic Service		No	23-380Official 23-380
54	Nick	Kaneski	nick.kaneski@enbridge.com	Enbridge Energy Company, Inc.		11 East Superior St Ste 125 Duluth MN, 55802 United States	Electronic Service		No	23-380Official 23-380

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
55	William	Kenworthy	will@votesolar.org			1 South Dearborn St Ste 2000 Chicago IL, 60603 United States	Electronic Service		No	23-380Official 23-380
56	Brian	Krambeer	bkrambeer@mienergy.coop	MiEnergy Cooperative		PO Box 626 31110 Cooperative Way Rushford MN, 55971 United States	Electronic Service		No	23-380Official 23-380
57	Michael	Krause	michaelkrause61@yahoo.com			1200 Plymouth Avenue Minneapolis MN, 55411 United States	Electronic Service		No	23-380Official 23-380
58	Michael	Krikava	mkrikava@taftlaw.com	Taft Stettinius & Hollister LLP		2200 IDS Center 80 S 8th St Minneapolis MN, 55402 United States	Electronic Service		No	23-380Official 23-380
59	Matthew	Lacey	mlacey@greenergy.com	Great River Energy		12300 Elm Creek Boulevard Maple Grove MN, 55369-4718 United States	Electronic Service		No	23-380Official 23-380
60	James D.	Larson	james.larson@avantenergy.com	Avant Energy Services		220 S 6th St Ste 1300 Minneapolis MN, 55402 United States	Electronic Service		No	23-380Official 23-380
61	Dean	Leischow	dean@sunrisenrg.com	Sunrise Energy Ventures		315 Manitoba Ave Ste 200 Wayzata MN, 55391 United States	Electronic Service		No	23-380Official 23-380
62	Annie	Levenson Falk	annielf@cubminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota Street, Suite W1360 St. Paul MN, 55101 United States	Electronic Service		No	23-380Official 23-380
63	Susan	Ludwig	sludwig@mnpower.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	23-380Official 23-380
64	Kavita	Maini	kmaini@wi.rr.com	KM Energy Consulting, LLC		961 N Lost Woods Rd Oconomowoc WI, 53066 United States	Electronic Service		No	23-380Official 23-380
65	Gregg	Mast	gmast@cleanenergyeconomymn.org	Clean Energy Economy Minnesota		4808 10th Avenue S Minneapolis MN, 55417 United States	Electronic Service		No	23-380Official 23-380
66	Erica	McConnell	emcconnell@elpc.org	Environmental Law & Policy Center		35 E. Wacker Drive, Suite 1600 Chicago IL, 60601 United States	Electronic Service		No	23-380Official 23-380
67	Thomas	Melone	thomas.melone@allcous.com	Minnesota Go Solar LLC		222 South 9th Street Suite 1600 Minneapolis MN, 55120 United States	Electronic Service		No	23-380Official 23-380

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
68	David	Moeller	dmoeller@allete.com	Minnesota Power			Electronic Service		No	23-380Official 23-380
69	Dalene	Monsebroten	dalene.monsebroten@nmpagency.com	Northern Municipal Power Agency		123 2nd St W Thief River Falls MN, 56701 United States	Electronic Service		No	23-380Official 23-380
70	Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP		33 South Sixth St Ste 4200 Minneapolis MN, 55402 United States	Electronic Service		No	23-380Official 23-380
71	Anthony	Nelson	amnelson@otpc.com	Ottertail Power		53233 Sunrise Ln Park Rapids MN, 56470 United States	Electronic Service		No	23-380Official 23-380
72	Ben	Nelson	benn@cmpasgroup.org	CMPMPA		459 South Grove Street Blue Earth MN, 56013 United States	Electronic Service		No	23-380Official 23-380
73	Carl	Nelson	cnelson@mncee.org	Center for Energy and Environment		212 3rd Ave N Ste 560 Minneapolis MN, 55401 United States	Electronic Service		No	23-380Official 23-380
74	David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency		220 South Sixth Street Suite 1300 Minneapolis MN, 55402 United States	Electronic Service		No	23-380Official 23-380
75	Sephra	Ninow	sephra.ninow@energycenter.org	Center for Sustainable Energy		426 17th Street, Suite 700 Oakland CA, 94612 United States	Electronic Service		No	23-380Official 23-380
76	Rolf	Nordstrom	rnordstrom@gpisd.net	Great Plains Institute		2801 21ST AVE S STE 220 Minneapolis MN, 55407-1229 United States	Electronic Service		No	23-380Official 23-380
77	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	23-380Official 23-380
78	David	O'Brien	david.obrien@navigant.com	Navigant Consulting		77 South Bedford St Ste 400 Burlington MA, 01803 United States	Electronic Service		No	23-380Official 23-380
79	Jeff	O'Neill	jeff.oneill@ci.monticello.mn.us	City of Monticello		505 Walnut Street Suite 1 Monticello MN, 55362 United States	Electronic Service		No	23-380Official 23-380
80	Matthew	Olsen	molsen@otpc.com	Otter Tail Power Company		215 South Cascade Street Fergus Falls MN, 56537 United States	Electronic Service		No	23-380Official 23-380
81	Russell	Olson	rolson@hcpd.com	Heartland Consumers Power District		PO Box 248 Madison SD, 57042-0248 United States	Electronic Service		No	23-380Official 23-380
82	Dan	Patry	dpatry@sunedison.com	SunEdison		600 Clipper Drive	Electronic Service		No	23-380Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						Belmont CA, 94002 United States				23-380
83	Jeffrey C	Paulson	jeff.jcplaw@comcast.net	Paulson Law Office, Ltd.		4445 W 77th Street Suite 224 Edina MN, 55435 United States	Electronic Service		No	23-380Official 23-380
84	Jennifer	Peterson	jjpeterson@mnpower.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	23-380Official 23-380
85	Hannah	Polikov	hpolikov@aee.net	Advanced Energy Economy Institute		1000 Vermont Ave, Third Floor Washington DC, 20005 United States	Electronic Service		No	23-380Official 23-380
86	David G.	Prazak	dprazak@otpc.com	Otter Tail Power Company		P.O. Box 496 215 South Cascade Street Fergus Falls MN, 56538-0496 United States	Electronic Service		No	23-380Official 23-380
87	Generic Notice	Regulatory	regulatory_filing_coordinators@otpc.com	Otter Tail Power Company		215 S. Cascade Street Fergus Falls MN, 56537 United States	Electronic Service		No	23-380Official 23-380
88	John C.	Reinhardt		Laura A. Reinhardt		3552 26th Ave S Minneapolis MN, 55406 United States	Paper Service		No	23-380Official 23-380
89	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	23-380Official 23-380
90	Kevin	Reuther	kreuther@mncenter.org	MN Center for Environmental Advocacy		26 E Exchange St, Ste 206 St. Paul MN, 55101-1667 United States	Electronic Service		No	23-380Official 23-380
91	Michael	Riewer	mriewer@otpc.com	Otter Tail Power Company		PO Box 4496 Fergus Falls MN, 56538-0496 United States	Electronic Service		No	23-380Official 23-380
92	Noah	Roberts	nroberts@cleanpower.org	Energy Storage Association		1155 15th St NW, Ste 500 Washington DC, 20005 United States	Electronic Service		No	23-380Official 23-380
93	Robert K.	Sahr	bsahr@eastriver.coop	East River Electric Power Cooperative		P.O. Box 227 Madison SD, 57042 United States	Electronic Service		No	23-380Official 23-380
94	Elena	Saxonhouse	elena.saxonhouse@sierraclub.org	Sierra Club Environmental Law Program		2101 Webster St Ste 1300 Oakland CA, 94612 United States	Electronic Service		No	23-380Official 23-380
95	Kay	Schraeder	kschraeder@minnkota.com	Minnkota Power		5301 32nd Ave S Grand Forks ND, 58201 United States	Electronic Service		No	23-380Official 23-380

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
96	Dean	Sedgwick	sedgwick@itascapower.com	Itasca Power Company		PO Box 455 Spring Lake MN, 56680 United States	Electronic Service		No	23-380Official 23-380
97	Maria	Seidler	maria.seidler@dom.com	Dominion Energy Technology		120 Tredegar Street Richmond VA, 23219 United States	Electronic Service		No	23-380Official 23-380
98	Patricia	Sharkey	psharkey@environmentallawcounsel.com	Midwest Cogeneration Association.		180 N LaSalle St Ste 3700 Chicago IL, 60601 United States	Electronic Service		No	23-380Official 23-380
99	Doug	Shoemaker	dougs@charter.net	Minnesota Renewable Energy		2928 5th Ave S Minneapolis MN, 55408 United States	Electronic Service		No	23-380Official 23-380
100	Anne	Smart	anne.smart@chargepoint.com	ChargePoint, Inc.		254 E Hacienda Ave Campbell CA, 95008 United States	Electronic Service		No	23-380Official 23-380
101	Joshua	Smith	joshua.smith@sierraclub.org			85 Second St FL 2 San Francisco CA, 94105 United States	Electronic Service		No	23-380Official 23-380
102	Ken	Smith	ken.smith@ever-greenenergy.com	Ever Green Energy		305 Saint Peter St Saint Paul MN, 55102 United States	Electronic Service		No	23-380Official 23-380
103	Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.		76 W Kellogg Blvd St. Paul MN, 55102 United States	Electronic Service		No	23-380Official 23-380
104	Trevor	Smith	trevor.smith@avantenergy.com	Avant Energy, Inc.		220 South Sixth Street Suite 1300 Minneapolis MN, 55402 United States	Electronic Service		No	23-380Official 23-380
105	Beth	Soholt	bsoholt@cleangridalliance.org	Clean Grid Alliance		570 Asbury Street Suite 201 St. Paul MN, 55104 United States	Electronic Service		No	23-380Official 23-380
106	Sky	Stanfield	stanfield@smwlaw.com	Shute, Mihaly & Weinberger		396 Hayes Street San Francisco CA, 94102 United States	Electronic Service		No	23-380Official 23-380
107	Byron E.	Starns	byron.starns@stinson.com	STINSON LLP		50 S 6th St Ste 2600 Minneapolis MN, 55402 United States	Electronic Service		No	23-380Official 23-380
108	Cary	Stephenson	cstephenson@otpc.com	Otter Tail Power Company		215 South Cascade Street Fergus Falls MN, 56537 United States	Electronic Service		Yes	23-380Official 23-380
109	Dean	Taylor	dtaylor@pluginamerica.org	Plug In America		6380 Wilshire Blvd, Suite 1000 Los Angeles CA, 90048 United States	Electronic Service		No	23-380Official 23-380
110	Stuart	Tommerdahl	stommerdahl@otpc.com	Otter Tail Power Company		215 S Cascade St	Electronic Service		Yes	23-380Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						PO Box 496 Fergus Falls MN, 56537 United States				23-380
111	Jason	Topp	jason.topp@lumen.com	Qwest Communications Company, LLC.		200 S 5th St Ste 2200 Minneapolis MN, 55402 United States	Electronic Service		No	23- 380Official 23-380
112	Pat	Treseler	pat.jcplaw@comcast.net	Paulson Law Office LTD		4445 W 77th Street Suite 224 Edina MN, 55435 United States	Electronic Service		No	23- 380Official 23-380
113	Stacy	Wahlund	swahlund@otpc.com	Otter Tail Power Company		215 S. Cascade St Fergus Falls MN, 56537 United States	Electronic Service		No	23- 380Official 23-380
114	Roger	Warehime	roger.warehime@owatonnautilities.com	Owatonna Municipal Public Utilities - Gas		208 S Walnut Ave PO BOX 800 Owatonna MN, 55060 United States	Electronic Service		No	23- 380Official 23-380
115	Jenna	Warmuth	jwarmuth@mnpower.com	Minnesota Power		30 W Superior St Duluth MN, 55802-2093 United States	Electronic Service		No	23- 380Official 23-380
116	Robyn	Woeste	robynwoeste@alliantenergy.com	Interstate Power and Light Company		200 First St SE Cedar Rapids IA, 52401 United States	Electronic Service		No	23- 380Official 23-380
117	Christopher	Zibart	czibart@atcllc.com	American Transmission Company LLC		W234 N2000 Ridgeview Pkwy Court Waukesha WI, 53188- 1022 United States	Electronic Service		No	23- 380Official 23-380
118	Kurt	Zimmerman	kwz@ibew160.org	Local Union #160, IBEW		2909 Anthony Ln St Anthony Village MN, 55418-3238 United States	Electronic Service		No	23- 380Official 23-380