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June 12, 2026

**VIA EDOCKETS**

Sasha Bergman  
Executive Secretary  
Minnesota Public Utilities Commission  
121 7th Place East, Suite 350  
St. Paul, MN 55101

**Re: *In the Matter of the Application of Xcel Energy for Authority to Increase Rates for Electric Service in Minnesota***  
**Docket No. E-002/GR-24-320**

Dear Ms. Bergman:

I write on behalf of the Minnesota Department of Commerce to provide a comprehensive list of the agency's preferred decision options and address Commissioner Tuma's request for additional information on a possible nuclear insurance expense true-up.

**VOLUME 1: FINANCIAL ISSUES**

***Sherco Unit 3 & Allen S. King Coal Plant Remaining Lives***

1001. Require Xcel Energy to accelerate depreciation schedule on Sherco Unit 3 and King coal plants to reflect current retirement dates. (Department)

***Prepaid Pension & Accrued Liabilities***

1006a. Permit Xcel to earn a return on \$1,000 of rate base reflecting the Company's nominal future interest in the prepaid pension asset. (Department)

1007. Approve Xcel's request to earn a return on the prepaid pension asset based on the Company's long-term debt rate. (Xcel and Department alternative, ALJ)

***Riverside Generating Unit***

1011a. Remove the Riverside unit from the 2025 Test Year and 2026 Plan Year for the period it is not expected to be used and useful: May 1, 2025 – May 30, 2026. (ALJ, Department)

- 1013 Remove from Xcel’s proposed revenue requirement all O&M expense associated with the Riverside unit, other than property taxes and depreciation. (Department, Xcel alternative)
- 1017a. Within 90 days of Riverside’s return to service, refer the Riverside outage matter to the Court of Administrative Hearings for a contested case hearing to evaluate:
- A. whether Xcel was prudent in its actions including its maintenance of the Riverside plant and the cause of the plant outage,
  - B. the impact on energy replacements costs in fuel clause filings, and
  - C. the determination and treatment of future lost planning resource auction capacity revenues via the capacity tracker due to the outage. (Department)
1020. Pursuant to Minn. Stat. § 216B.62, subd. 8, determine that it is necessary to conduct an investigation of public utility operations, practices, or policies requiring specialized technical professional investigative services for the inquiry, and request that the Commissioner of the Department of Commerce seek authority from the Commissioner of Management and Budget to incur costs for specialized services to hire an engineering expert to review the Riverside outage ~~report’s analysis and conclusions to determine 1) whether Xcel was prudent in its actions, 2) the impact on energy replacements costs in fuel clause filings, and 3) the determination and treatment of future lost planning resource auction capacity revenues via the capacity tracker due to the outage.~~<sup>1</sup> (Department)

***Time-of-Use Rate Implementation Costs***

1023. Approve Xcel’s Time of Use Rate Implementation incremental costs of \$3.2 million (\$2.8 million – MN jurisdiction) for the 2025 Test Year and 2026 Plan Year. (Xcel)
- or
1024. Disallow Rate Comparison Tool costs of \$0.2 million for the 2025 Test Year, and \$1.2 million for 2026 Plan Year. (ALJ, OAG)

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<sup>1</sup> The deleted text is captured in Decision Option No. 1017a.

***Distribution O&M (Vegetation Management)***

1031. Remove \$5.8 million in vegetation management expenses in 2025, and \$8.3 million in 2026, reflecting a total amount of \$31.6 million in 2025 and \$32.6 million in 2026. (Department, ALJ)

***Transmission O&M***

1033. Remove \$1.5 million in Transmission O&M expenses in 2025, and \$2.0 million in 2026. (ALJ, Department)

***General Allocator***

1038. Order Xcel to use FTE hours for its General Allocator calculations which results in 2025-2026 MN jurisdictional revenue requirement reductions of \$6.3 million for 2025, and \$6.5 million for 2026. (Department, ALJ)

***Interchange Agreement Allocator***

1040. Implement an Interchange Agreement Allocator based on the most recently approved 2025 FERC data, which results in an allocation of 84.0693% for Minnesota, and a revenue requirement increase of \$0.3 million for 2025, and decrease of \$2.9 million for 2026. (Department)

***Indirect Wildfire Costs Allocation: support 1042***

1042. Approve Xcel's recovery of indirect wildfire costs based on direct wildfire mitigation costs. (Department, OAG)

***Base Pay***

1045. Approve the Department's recommended primary adjusted base pay increase of \$348.61 million and \$358.61 million for 2025 and 2026 test years, reflecting a reduction of \$17.63 million and \$9.72 million from Xcel's proposed base pay increase in 2025 and 2026 test years. (Department)
1046. Approve Department's alternate adjusted base pay increase of \$357.49 million and \$360.94 million for 2025 and 2026 test years, reflecting a reduction of \$9.80 million and \$9.40 million from Xcel's proposed base pay increase in 2025 and 2026 test years. (Department Alternative)
- 1046a. Require Xcel to include a schedule of its total rewards program, including base pay on a Minnesota electric jurisdictional basis. (Department)

1047. Require Xcel to include an FTE count on a Minnesota electric jurisdictional basis for its next rate case to assist in the review of future base pay recovery requests.

***Long-Term Incentive Compensation***

1050. Deny recovery of Xcel's MN Jurisdictional 2025-2026 long term incentive compensation expense of \$11,481,695 for 2025 test year, and \$12,090,503 for 2026 plan year, respectively. (Department, XLI, ALJ)

***Annual Incentive Plan Compensation***

1053. Authorize Xcel to recover AIP expense based on a 15% individual cap and a 100% target level payout. Reduce Xcel's proposed AIP expense by adjustment of MN Jurisdictional annual incentive plan expense of \$1,254,103 and \$1,293,290 for 2025 test year and 2026 plan year. (Department, XLI, ALJ)
1054. Require Xcel to continue to administer the AIP program on an individual basis. (Department, XLI, ALJ)
1057. Deny the request to eliminate AIP refund compliance filings.

***Top Ten/Executive Compensation***

1059. Deny recovery of total Minnesota electric jurisdiction ten top-paid executive compensation amounts of \$7,301,543 and \$7,573,008 in 2025 and 2026 respectively. (Department, OAG, ALJ)
- 1060a. Limit ratepayer recovery of compensation for the ten highest-paid executives to a maximum of 50% of the Minnesota electric jurisdictional amount, after applying the outcome of other compensation and benefit-related decisions (e.g., AIP cap, LTI decisions). (Department alternative 1)
1060. Establish a set cap salary permitted for use in a recovery calculation for Ten top paid executive roles subject to the jurisdictional allocators to calculate the Minnesota electric jurisdictional amount eligible for recovery for these executive roles. (Department alternative 2)

***Limited Availability Benefits***

1064. Deny Xcel's request to recover its limited availability benefits of \$103,003 in both 2025 test year and 2026 plan year. (Department)

***Miscellaneous Benefit, Life, LTD Expense***

1067a. Accept the ALJ's modification to the Department's recommended adjustment by allowing Xcel to recover Miscellaneous Benefit, Life, and LTD expense at a level set by applying the Department's proposed methodology and inflation factor to the 2024 actual expenses rather than the Department's suggested average of actual expenses from 2022 through 2024. This methodology results in an adjustment amount of \$485,714 and \$422,718 to Xcel's proposed Miscellaneous Benefit, Life, and LTD expenses for the 2025 test year and 2025 plan year. (Department, ALJ)

***Non-Qualified Expenses***

1069. Deny Xcel's request to recover the amount of its non-qualified expenses of \$44,662 in 2025 test year and \$48,394 for 2026 plan year. (Department)

***Board of Directors Expense***

1071. Allow Xcel to recover its proposed board of directors' expenses capped at 50% by reducing amount of recovery in 2025 test year by \$606,897 and 2026 plan year by \$661,153. (Department, ALJ)

***Outside Services (FERC Account 923)***

1073. Allow Xcel to recover the Outside Services O&M expenses in the amount of \$22.5 million and \$24.2 million for test years 2025-2026, respectively. (Department, ALJ)

***Liquidated Damages***

1085a. Require Xcel Energy to include liquidated damages in O&M Forecast [as adjusted in ALJ's Report](#). (Department)

***Insurance Expense***

1087. Remove \$5.3 million in insurance expenses from 2025, and \$5.8 million in 2026. (Department)

Although the Department continues to oppose an insurance true-up because it does not incentivize the utility to manage insurance costs, below are two additional decision options reflecting Commissioner Tuma's June 11 discussion. These new decision options result in a \$15.955 million reduction to 2025 Test Year, and a \$19.360 million reduction to the 2026 Test Year.

1087a. Approve a four-year average based on 2021 to 2024 actuals for non-nuclear insurance costs of \$20.497 million for the 2025 and 2026 Test Years. [Tuma]

1087b. Approve a four-year average based on 2021 to 2024 actuals for nuclear insurance costs and any insurance credits of a negative (\$2.215 million) for the 2025 and 2026 Test Years, with an allowed true-up to actuals in next rate case, including the Company's supporting documentation for actual insurance costs and credits. [Tuma]

### ***Property Tax***

1092. Deny Xcel's request to recover its updated forecast Minnesota Electric Jurisdictional property tax expense of \$184.2 million and \$195.4 million for the 2025 Test Year and 2026 Plan Year, subject to a true-up mechanism. (Department, ALJ)

1093. Adopt for Xcel's recovery the Department's updated forecast Minnesota Electric Jurisdictional property tax expense of \$178.9 million and 182.5 million for the 2025 Test Year and 2026 Plan Year, subject to a true-up mechanism. (Department, ALJ)

1094. Allow Xcel to continue the property tax expense true-up mechanism. (Xcel, Department, ALJ)

### ***Nox Tracker***

1108. Approve Xcel Energy's proposed NOx Tracker and require Xcel to provide support for related expenses in annual compliance filings. (Xcel, Department)

### ***Classification of AMI Meters & Equipment***

1110. Require Xcel Energy to submit a study comparing costs of AMI meters with costs of traditional meters both in use and reading. (Department, ALJ)

## **VOLUME II: COST OF CAPITAL**

### ***Capital Structure***

2001. Adopt Xcel's proposed capital structure. [ALJ, Department, Xcel]

### ***Cost of Debt***

2002. Adopt Xcel's proposed cost of long-term debt. [ALJ, Department, Xcel]

2003. Adopt Xcel's proposed cost of short-term debt. [ALJ, Department, Xcel]

***Flotation Cost Adjustment***

2004. Adopt Xcel's proposed flotation costs of 8 basis points. [ALJ, Department, Xcel]

***Additional Risk Adjustments***

2008. Find that no risk adjustment is necessary. [ALJ, Xcel, Department]

***Selection of Proxy Groups and Screening Criteria***

2010. Adopt the Department's screening criteria and resulting proxy group. [Department]

***Selection of Analytical Models and Growth Rates***

2014. Determine that the Multi-Stage Discounted Cash Flow model, checked for reasonableness, is the most appropriate method for estimating cost of equity. [Department]

2018a. Establish a 9.25 percent return on equity for setting rates in this proceeding [and modify proposed findings 971, 973, 979, 982–83, 985–86, 992–94 as recommended by the Department, delete findings 972, 974–75, 980–81 as recommended by the Department, and adopt new paragraphs 976–77 and 980–81 as recommended by the Department.](#) [Department]

***Cost of Long-Term Debt and Capital Structure in Future Rate Cases***

2022. Require Xcel Energy to provide a more robust analysis of its proposed capital structure in its next rate case that considers not just the benefits of lower cost of debt, but also the additional equity-related costs associated with achieving that lower cost debt. [ALJ, Department]

2023. Require Xcel Energy to demonstrate that the costs of each debt issuance made since its prior rate case reasonably reflect the risks of NSPM, and are not inflated by risks associated with other entities within Xcel Energy, Inc. corporate structure. [ALJ, Department]

2027. Adopt the following overall cost of capital reflecting the Department's 9.25 percent return on equity for the MYRP. [Department]

### **VOLUME III: SALES**

#### ***Forecast Adjustments***

3001. Approve Xcel Energy's updated sales forecasts for ~~2025~~ and 2026. (Xcel, Department, ALJ)
3002. Require Xcel to file all the documentation to allow for verification of sales, weather normalization, and revenues, consistent with what Xcel has previously provided in its sales true-up compliance filings in the 2020 and 2021 stay out petitions, as well as in its Docket No. 24 E-002/GR-21-630 compliance filings; (Xcel, Department, ALJ)

#### ***Capacity Revenue Baseline & True-Up***

3003. Approve the Company's updated capacity revenue amounts for 2025 and 2026 to set rates, subject to true-up in the Company's annual capacity tracker filings. (Xcel, Department, ALJ)

#### ***Prairie Island Capacity Revenue***

3004. Adjust the Company's cost of service for both 2025 and 2026 to include \$171,076 in lost revenues due to the PINGP outage. (Xcel, Department, ALJ)

#### ***Generation Capacity Resources***

3005. Update the baseline capacity revenues, subject to true-up in the Company's annual capacity tracker filings. (Xcel, Department, ALJ)

### **VOLUME IV: CLASS COST OF SERVICE**

#### ***General Decision Options***

4001. Determine that each CCOSS model provides useful information and decline to adopt any specific model. (ALJ, Staff)

#### ***Classification of Production Costs***

4003. Approve Xcel's proposal to classify and allocate production costs using the Stratification Method. (Xcel, DOC, OAG).

***D10S Allocator***

4005. Approve Xcel's calculation of the D10S allocator based on its system peak coincident with the MISO system peak using historical data. (Xcel, Department)

***Classification of Transmission Costs***

4010. Approve Xcel's proposal to allocate demand-related transmission costs using the D10S allocator in its future rate cases. (Xcel, XLI and Department)

***Classification of Distribution Costs***

4013. Approve Xcel's filing of the three Cost studies, using different methods to classify distribution system costs. (Xcel, Department, ALJ)
4018. Require Xcel to file an updated study calculating its demand adjustment applied to the Minimum System Method in its next rate case. (Department)

***Classification and Allocation of AMI***

4020. Require Xcel to provide a study showing the costs of AMI meters compared to the costs of traditional meters, and to classify the difference between those costs as either demand- or energy-related in Xcel's next rate case. (Department, ALJ)

***Classification of Other Production O&M***

4021. Approve Xcel's classification of Other Production O&M costs that vary with energy usage as energy-related. (Xcel, OAG, ALJ)

***Classification and Allocation of Economic Development Discount Costs***

4023. Approve Xcel's use of the R02 (Base Revenue) allocator to classify and allocate Economic Development Discount Costs. (Xcel, XLI, Department, ALJ)

**VOLUME V: RATE DESIGN**

***Class Revenue Apportionment***

5002. Adopt the Department's proposed 2025 test year revenue apportionment for the entire MYRP. [Department]

***Residential and Small Commercial Customer Charges***

5006. Adopt OAG's proposal to maintain the current \$6.00 per month customer charge for both Residential and Small Commercial customers. [OAG, DOC, ALJ]

***Residential Arrears Management Program***

5016. Approve RAMP as proposed by Xcel with all six modifications recommended by the Department, including the 2026 funding cap. [Department]

***Street Lighting***

5023. Approve Xcel's proposed Rate Code A30 rate design as filed. (Xcel, Department, ALJ).

***Excess Footage Charges***

5039. Approve Xcel's proposed increases to all three Excess Footage Charges as follows: Service Line from \$7.90 to \$10.00 per foot; Single-Phase Primary or Secondary Extension from \$8.00 to \$10.50 per foot; and Three-Phase Primary or Secondary Extension from \$13.90 to \$17.00 per foot. [Xcel, Department, ALJ].

***Winter Construction Charges***

5040. Approve Xcel's proposed increases to all Winter Construction Charges as follows: Thawing from \$640.00 to \$870.00 per Frost Burner; and Trenching from \$8.90 to \$18.00 per foot. [Xcel, Department, ALJ].

***Dedicated Switching***

5041. Approve Xcel's proposed increases to all Dedicated Switching Charges as follows: Monday-through-Saturday rate from \$300.00 to \$800.00 per hour; and Sunday/holiday rate from \$400.00 to \$1,000.00 per hour. [Xcel, Department, ALJ].

***Fuel Clause Rider***

5042. Approve Xcel Energy's proposed updates to the Fuel Adjustment Factor Ratios for Test Year 2025. [Xcel, ALJ, Department]

***2025 Late Fee Revenue***

5043. Require Xcel to include \$6.1 million in late fee revenues in the Company's cost of service for 2025. [Xcel, ALJ, Department]

Ms. Sasha Bergman

June 12, 2026

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***ATO/MTO Dual Feeder Service***

5044. Authorize Xcel to implement the new monthly reserved capacity charge for new ATO/MTO Dual Feeder Service customers and for existing customers upon contract renewal or expiration of existing agreements. [Xcel, ALJ, Department]
5045. Require Xcel to track revenues under all new ATO/MTO Dual Feeder Service contracts and to report those revenues in the Company's next rate case, along with a forecasted budget of revenues for the proposed test years. [Xcel, ALJ, Department]

By copy of this letter, all parties have been served. A declaration of service is also enclosed. Thank you for your attention to this matter.

Sincerely,

/s/ **Richard Dornfeld**

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RICHARD DORNFELD

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*Attorney for Minnesota Department of Commerce*

Enclosure

cc: Service List

**DECLARATION OF SERVICE**

**Re: *In the Matter of the Application of Xcel Energy for Authority to Increase Rates for Electric Service in Minnesota***  
**CAH No. 28-2500-40515; Docket No. E-002/GR-24-320**

STATE OF MINNESOTA    )  
  ) ss.  
COUNTY OF RAMSEY    )

I, ANN KIRLIN, hereby state that on June 12, 2026, I filed by electronic eDockets the attached **Minnesota Department of Commerce’s Preferred Decision Options**, and eServed and/or sent by U.S. Mail, as noted, to all parties on the attached service list.

See attached service list.

I declare under penalty of perjury that everything I have stated in this document is true and correct.

/s/ Ann Kirlin\_\_\_\_\_

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53	Robert	Manning	robert.manning@state.mn.us		Public Utilities Commission	121 7th Place East Suite 350 Saint Paul MN, 55101 United States	Electronic Service		No	Official 24-320
54	Ashley	Marcus	ashley.marcus@state.mn.us		Public Utilities Commission	121 7th Place East Suite 350 St. Paul MN, 55101 United States	Electronic Service		No	Official 24-320
55	Christine	Marquis	regulatory.records@xcelenergy.com	Xcel Energy		414 Nicollet Mall MN1180-07-MCA Minneapolis MN, 55401 United States	Electronic Service		No	Official 24-320
56	Mary	Martinka	mary.a.martinka@xcelenergy.com	Xcel Energy Inc		414 Nicollet Mall 7th Floor Minneapolis MN, 55401 United States	Electronic Service		No	Official 24-320
57	Erica	McConnell	emcconnell@elpc.org	Environmental Law & Policy Center		35 E. Wacker Drive, Suite 1600 Chicago IL, 60601 United States	Electronic Service		No	Official 24-320
58	Stephen	Melchionne	stephen.melchionne@ag.state.mn.us		Office of the Attorney General - Department of Commerce	445 Minnesota Street, Ste. 1400 St. Paul MN, 55101 United States	Electronic Service		No	Official 24-320
59	Greg	Merz	greg.merz@ag.state.mn.us		Office of the Attorney General - Department of Commerce	445 Minnesota Street Suite 1400 St. Paul MN, 55101 United States	Paper Service		Yes	Official 24-320
60	Joseph	Meyer	joseph.c.meyer@state.mn.us		Office of Administrative Hearings	PO Box 64620 St. Paul MN, 55164 United States	Electronic Service		Yes	Official 24-320
61	Hirsi	Mohamed	hirsi.mohamed@state.mn.us		Public Utilities Commission	121 7th Place E, Suite 350 Saint Paul MN, 55101 United States	Electronic Service		No	Official 24-320
62	Marta	Monti	marta@energycents.org	Energy CENTS Coalition		823 E. 7th Street St. Paul MN, 55106 United States	Paper Service		No	Official 24-320
63	Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP		33 South Sixth St Ste	Electronic Service		No	Official 24-320

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						4200 Minneapolis MN, 55402 United States				
64	Christa	Moseng	christa.moseng@state.mn.us		Office of Administrative Hearings	P.O. Box 64620 Saint Paul MN, 55164- 0620 United States	Electronic Service		Yes	Official 24-320
65	David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency		220 South Sixth Street Suite 1300 Minneapolis MN, 55402 United States	Electronic Service		No	Official 24-320
66	Carol A.	Overland	overland@legalectric.org	Legaelectric - Overland Law Office		1110 West Avenue Red Wing MN, 55066 United States	Electronic Service		No	Official 24-320
67	Wendy	Raymond	wendy.raymond@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	445 Minnesota Street Suite 600 St. Paul MN, 55101 United States	Electronic Service		No	Official 24-320
68	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	Official 24-320
69	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	Official 24-320
70	Amanda	Rome	amanda.rome@xcelenergy.com	Xcel Energy		414 Nicollet Mall FL 5 Minneapolis MN, 55401 United States	Electronic Service		No	Official 24-320
71	Joseph L	Sathe	jsathe@kennedy-graven.com	Kennedy & Graven, Chartered		150 S 5th St Ste 700 Minneapolis MN, 55402 United States	Electronic Service		No	Official 24-320
72	Elizabeth	Schmiesing	eschmiesing@winthrop.com	Winthrop & Weinstine, P.A.		225 South Sixth Street Suite 3500 Minneapolis MN, 55402 United States	Electronic Service		No	Official 24-320
73	Peter	Scholtz	peter.scholtz@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	Suite 1400 445 Minnesota Street St. Paul MN, 55101-2131 United States	Electronic Service		Yes	Official 24-320
74	Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates		7400 Lyndale Ave S Ste 190 Richfield MN, 55423 United States	Electronic Service		No	Official 24-320

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
75	George	Shardlow	george@energycents.org	Energy CENTS Coalition		823 E. 7th Street Saint Paul MN, 55106 United States	Electronic Service		No	Official 24-320
76	Joshua	Smith	joshua.smith@sierraclub.org			85 Second St FL 2 San Francisco CA, 94105 United States	Electronic Service		No	Official 24-320
77	Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.		76 W Kellogg Blvd St. Paul MN, 55102 United States	Electronic Service		No	Official 24-320
78	Beth	Soholt	bsoholt@cleangridalliance.org	Clean Grid Alliance		570 Asbury Street Suite 201 St. Paul MN, 55104 United States	Electronic Service		No	Official 24-320
79	Byron E.	Starns	byron.starns@stinson.com	STINSON LLP		50 S 6th St Ste 2600 Minneapolis MN, 55402 United States	Electronic Service		No	Official 24-320
80	Scott	Strand	sstrand@elpc.org	Environmental Law & Policy Center		60 S 6th Street Suite 2800 Minneapolis MN, 55402 United States	Paper Service		No	Official 24-320
81	James M	Strommen	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered		150 S 5th St Ste 700 Minneapolis MN, 55402 United States	Electronic Service		No	Official 24-320
82	Eric	Swanson	eswanson@winthrop.com	Winthrop & Weinstine, P.A.		225 6th St Ste 3500 Minneapolis MN, 55402 United States	Electronic Service		No	Official 24-320
83	Anthony	Willingham	anthony.willingham@electrifyamerica.com	Electrify America		1950 Opportunity Way Suite 1500 Reston VA, 20190 United States	Electronic Service		No	Official 24-320
84	Joseph	Windler	jwindler@winthrop.com	Winthrop & Weinstine		225 South Sixth Street, Suite 3500 Minneapolis MN, 55402 United States	Electronic Service		No	Official 24-320
85	Kurt	Zimmerman	kwz@ibew160.org	Local Union #160, IBEW		2909 Anthony Ln St Anthony Village MN, 55418-3238 United States	Electronic Service		No	Official 24-320
86	Patrick	Zomer	pzomer@cozen.com	Cozen O'Connor		150 S. 5th Street, #1200 Minneapolis MN, 55402 United States	Electronic Service		No	Official 24-320