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Minneapolis, MN 55401

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January 9, 2026

—Via Electronic Filing—

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

RE: REPLY COMMENTS
CAPACITY*CONNECT, A DISTRIBUTED CAPACITY PROCUREMENT PROGRAM
DOCKET NO. E002/M-25-378

Dear Ms. Bergman:

Northern States Power Company, doing business as Xcel Energy, submits the enclosed Reply Comments in response to comments filed by parties as outlined in the Commission's October 16, 2025 Notice of Comment Period in the above-referenced docket.

Portions of this filing are marked "Not-Public" as they contain information the Company considers to be trade secret data as defined by Minn. Stat. § 13.37(1)(b). The information contains confidential cost and pricing data and commercial information that derives an independent economic value from not being generally known or readily ascertainable by others who could obtain economic value or a financial advantage from its disclosure or use. The Company takes efforts to protect this information from public disclosure. Thus, Xcel Energy excises this information as protected data pursuant to Minn. Rule 7829.0500.

We have electronically filed this document with the Minnesota Public Utilities Commission, and copies have been served on the parties on the attached service lists. Copies have also been served on the parties on service lists for Docket Nos. E002/RP-24-67 and E002/CN-23-212. Please contact Karin Haas at karin.haas@xcelenergy.com or contact me at jody.l.londo@xcelenergy.com if you have any questions regarding this filing.

Sincerely,

/s/

JODY L. LONDO
DIRECTOR, REGULATORY & STRATEGIC ANALYSIS

Enclosures
cc: Service Lists

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STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION

Katie J. Sieben	Chair
Hwikwon Ham	Commissioner
Audrey C. Partridge	Commissioner
Joseph K. Sullivan	Commissioner
John A. Tuma	Commissioner

IN THE MATTER OF XCEL ENERGY'S
PETITION FOR CAPACITY*CONNECT, A
DISTRIBUTED CAPACITY PROCUREMENT
(DCP) PROGRAM

DOCKET NO. E002/M-25-378

REPLY COMMENTS

INTRODUCTION

Northern States Power Company, doing business as Xcel Energy, submits these Reply Comments in response to comments from parties regarding the Company's proposal for Capacity*Connect (C*C), a Distributed Capacity Procurement (DCP) program.

The Company appreciates the robust engagement and thoughtful comments from parties. Indeed, as some commenters noted, the level of engagement on and interest in this matter demonstrates that the concept of DCP resonates with stakeholders in Minnesota and across the country. While it is evident that the Company's vision for Capacity*Connect differs from that of some parties, we believe our proposal effectively balances the need for incremental progress and innovation while seeking to benefit and protect all customers. Consistent with the Settlement Agreement in the Integrated Resource Plan (IRP) and Firm Dispatchable proceeding approved by the Commission,¹ our objective is to begin Phase 2 of C*C to deliver bulk system value for our customers while building the operational foundation for future phases.

Parties raised ideas that would, however, introduce additional complexity without corresponding benefits. In some cases, pursuing the suggested secondary and tertiary concepts may impede or inhibit the ability of the Company to realize the primary benefit streams that were identified and agreed to in the IRP Settlement Agreement. Our aim is to start simple: prioritize front of the meter (FTM) battery energy storage

¹ ORDER APPROVING SETTLEMENT AGREEMENT WITH MODIFICATIONS, Docket Nos. E002/RP-24-67 and E002/CN-23-212, Order (April 21, 2025) ("2024 IRP Order").

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systems (BESS) strategically sited on the distribution grid to operate within the Midcontinent Independent System Operator (MISO) market using the participation model that yields the greatest net benefits for customers as we gain experience with this resource model. We will deploy assets strategically to stack value where practical, rely on competitive processes for a significant share of the budget, and commit to rigorous reporting and an interim assessment to confirm realized benefits and ensure transparency.

We continue to believe our proposed range of 50 to 200 MW is the right approach to Phase 2, based on our analysis and our proposed reporting that provide opportunities to adjust the plan along the way.

We respectfully request the Commission approve:

- Implementation of Capacity*Connect Phase 2 as a learning phase, including:
 - Deployment of approximately 50-200 MW of Company-owned and -operated distribution-interconnected BESS by the end of 2028.
 - A budget range of approximately \$152 million (corresponding to the planned 50 MW deployment) to approximately \$430 million (estimated for a 200 MW deployment) through 2028.
 - Quarterly status reporting, as shown in Attachment A, to begin no later than three months after the Commission's Order.
 - An Interim Program Assessment, including measurement and verification (M&V) from a third-party consultant, to be filed after commercial operation of 20 MW or two years from Phase 2 approval, whichever is sooner.
 - A Capacity*Connect Evaluation Plan to be filed within 180 days of the Commission's Order.
 - Implementation of a limited deployment of a grid distributed energy resources management system (DERMS).
- The Company's proposal to seek recovery of C*C costs in the Renewable Energy Standard (RES) Rider.

In the remainder of this filing, we discuss:

- How our proposal protects and benefits customers by:
 - Focusing on the highest value use case for C*C assets: realizing bulk system value through MISO market participation;
 - Leveraging competitive sourcing processes and utilizing an implementation partner; and
 - Including robust measurement, verification, and reporting for transparency and accountability.

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- Why Company ownership is appropriate and necessary to enable customer benefits; enable speedy deployment; and protect safety, security, and reliability.
- The many existing opportunities, programs, and incentives available to third parties and why Company ownership does not detract from those opportunities.
- Our commitment to advancing equity through Capacity*Connect.
- How C*C supports Minnesota's clean energy goals and is eligible for RES Rider recovery under Minn. Stat. § 216B.16, subd. 7e.

The following attachments are included with these Reply Comments:

- Attachment A: Proposed Quarterly Report Contents
- Attachment B: Minn. Stat. § 216B.16, subd. 7e Compliance Matrix
- Attachment C: Party Comment Concepts and Alternate Venues

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EXECUTIVE SUMMARY

The Company's proposed distributed capacity procurement (DCP) program, Capacity*Connect, is a step toward aligning the growth of distributed energy resources (DER) with locations that provide the most benefit to customers system-wide. Whereas historically DER programs have only provided benefits to direct participants and recipients of incentives, Capacity*Connect seeks to leverage the benefits of DER as a benefit to all customers. Leveraging DER to provide benefits to *all customers* is a marked shift in distributed energy policy. Our proposal adheres to that objective, as outlined in the Settlement Agreement approved by the Commission.

Our Petition outlined a vision and Phase 2 proposal that would deploy 50-200 MW of Company-owned BESS on the distribution grid from 2026 through 2028 that will inform future phases. Capacity*Connect Phase 2 is a pragmatic, innovative learning phase designed to start simple and deliver near-term, system-wide customer value. By prioritizing bulk-system benefits through MISO market participation while strategically seeking stacked distribution value, our proposal focuses on the highest net-benefit use case for customers and builds the operational foundation needed to scale.

The Company's ownership model, paired with a limited Grid DERMS deployment, keeps safety, reliability, and cybersecurity paramount, and ensures Commission oversight of all aspects of the program. C*C Phase 2 creates opportunities for third-party vendors and protects customer affordability through competitive sourcing for approximately 80 percent of the program budget. We are committed to implementing Capacity*Connect with a focus on equity and environmental justice (EJ). Through quarterly status reports and an Interim Program Assessment with a measurement & verification consultant, we will maintain transparency as we implement this innovative initiative, while ensuring flexibility to adjust along the way as deployment expands and we learn as we go.

We appreciate parties' enthusiasm for the concept of DCP and appreciate that they have many suggestions. While some recommendations are outside the bounds of our Phase 2 proposal, we have evaluated parties' feedback and in response, we are modifying some aspects to our proposal in this Reply, while reaffirming other aspects.

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Modifications to our original proposal are as follows:

- We commit to **additional reporting**, including additional metrics related to equity and environmental justice. We also agree to submit an Evaluation Plan within 180 days of Commission Order, as recommended by the Department, to refine the approach to our proposed Interim Program Assessment.
- We agree to **refine our marginal distribution cost analysis** with our 2027 Integrated Distribution Plan (IDP) to estimate potential distribution system benefits of distribution assets like C*C BESS.²
- We incorporate **additional equity and environmental justice details and reporting**.
 - These additions reaffirm our commitment to equity and environmental justice while balancing the need for a speedy deployment of Phase 2 and recognizing that siting targets may, as the Department noted, “incentivize overburdening [EJ] communities.”³

While we continue to believe the total aggregate capacity target of 50-200 MW is the appropriate size of the learning phase, if the Commission directs a smaller pilot as suggested by the Department of Commerce, we will reduce the size of Phase 2. However, we note that reducing the size of Phase 2 will not be a linear reduction in terms of cost. The cost-benefit analysis and the estimated budget reflect economies of scale and efficiencies that may not translate to a smaller pilot.

Because Phase 2 is a starting point, we do not support significant program modifications suggested by parties. We reaffirm these aspects of the C*C program design, which benefit and protect customers:

- **Focus on bulk system benefits** through market participation.
 - As shown in our cost-benefit analysis (CBA), monetizing resource adequacy benefits through participation in MISO markets provides the most value to customers. Prioritizing other use cases focused on energy arbitrage, distribution-only value, and/or distributed generation (DG) interconnection, as suggested by some parties, are not consistent with the DCP concept, nor do they provide sufficient customer benefit.
- **Company ownership of C*C assets**.
 - Third parties and customers have ample opportunity to access our distribution system through the Company’s competitive procurements such as the current Near-Term Request for Proposals,⁴ state programs

² ELPC et al. Comments at p. 23.

³ Department Comments at p. 17.

⁴ See Docket No. E002/M-25-429 and <https://my.xcelenergy.com/s/renewable/developers/2025-nsp-rfp>.

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and policies such as the ~1 GW of community solar gardens (CSG) already on the Company's system and the Distributed Solar Energy Standard (DSES), and other Xcel Energy programs and initiatives. Indeed, as discussed in this filing there are nearly fifteen other current programs, opportunities, and incentives available for third-party DER on Xcel Energy's distribution system. Company ownership of Capacity*Connect assets ensures safe, reliable operation of our distribution system as we build the people, processes, and tools needed to manage BESS on our distribution system and interact with MISO markets.

- **Quarterly reporting along with an Interim Program Assessment.**
 - We will collaborate with our selected third-party measurement & verification consultant on an Interim Program Assessment to be submitted after 20 MW reach commercial operation or two years after Commission Order, whichever comes first.
- **Cost recovery through the RES Rider.**
 - Parties incorrectly assert that standalone storage assets such as C*C are not eligible for RES Rider recovery. On the contrary, standalone storage directly enables the Company's compliance with Minnesota's energy policies.
 - That said, with Phase 2 being a learning phase, C*C Phase 2 would qualify for rider recovery as an energy storage system pilot under Minn. Stat. § 216B.16, subd. 7e.

As we will explain, additional requirements are not necessary and, in some cases, counterproductive to a timely, safe, reliable deployment of C*C Phase 2.

The complexity of Capacity*Connect necessitates a simple, streamlined initial Phase at scale.

The concept of DCP and Capacity*Connect Phase 2 may appear deceptively simple at face value: deploy and operate BESS on the distribution system to meet the needs of the bulk system. In reality – as evidenced in part by the number and variety of party comments on our Petition – the approach is novel, and the implementation is complex and requires careful balancing of multiple factors (sometimes in the same moment during operation of the BESS). Further, Xcel Energy is the only party that bears the responsibility for safely and reliably coordinating the operation of the bulk system and distribution system.

Factors that must be considered include:

- Ensuring the safety of the employees who work with live distribution lines is

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of the utmost importance, as is protecting public safety.

- Minimizing costs while scaling a new program, including through customer acquisition in various jurisdictions with different interests and requirements.
- Maximizing customer benefits through participation in the MISO market.
- Seeking to maximize coincident distribution benefits.
- Ensuring resource availability when MISO calls on the resources.
- Ensuring no adverse effects on the distribution system when MISO calls on the resource.
- Complying with all cybersecurity standards and best practices to maintain a safe, reliable system.
- Seeking to minimize impacts on hosting capacity for distributed generation.
- Coordinating operations between the Company's distribution control center and commercial operations, whose roles and systems historically have not necessitated significant interaction or coordination.
- Implementing the program equitably.

Given these factors and inherent challenges, additional requirements such as varying use cases or archetypes, prescriptive analysis and reporting, working groups, development of other programs or future C*C phases, or third-party ownership are premature at best. These elements will serve to add unnecessary complexities that make operations more difficult and potentially risky – and hamper the Company's ability to get Capacity*Connect off the ground. As the Department of Commerce recognized, there is significant value in learning, data acquisition, and de-risking a larger, future program.⁵ Further, many of the suggestions raised by parties are more appropriately – and often are already being – addressed in other proceedings, as shown in Attachment C. Company ownership is appropriate and swift implementation of a simple, learning phase in Phase 2 will set us on the pathway to a more expansive program as part of a broader ecosystem of DER initiatives.

⁵ Department Comments at p. 9.

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Our proposal maximizes benefits to customers.

Customer protection and benefits anchor our proposal. Our modeling and analysis indicates bulk-system capacity and resource adequacy via MISO participation would materially exceed benefits from distribution-only use cases. Seeking to stack benefit streams through strategic siting – and eventually looking toward more dynamic operating paradigms – is a core component of the C*C concept. The focus on bulk system operations and value in Phase 2 does not negate the distribution system benefits we believe are possible through C*C – we agree there is distribution value and will seek to measure that value specifically as learning objective in Phase 2. We also agree with Environmental Law and Policy Center et al. that developing and refining a Minnesota-specific distribution benefit value for future analyses would be useful – and we agree to conduct that analysis with our 2027 IDP, due November 1, 2027.⁶ However, recommendations to maximize speculative distribution system value as some parties have suggested, at the expense of being unable to monetize wholesale market value streams, are not in the public interest.

Our commitment to implementing C*C equitably is also a core component of our proposal. The additional requirements that parties have suggested are not appropriate or necessary for the scale of Capacity*Connect and our objective of moving quickly to learn and adjust as we go. We are committed to engaging deeply with our customers and communities throughout the site host acquisition process, ensuring that customers in EJ areas, community organizations, and certified businesses have the first opportunity to sign on as site hosts if they choose to. Whether or not a customer wishes to host a C*C BESS, we envision that this outreach will enable us to start conversations with customers, and understand their needs and priorities so we can help meet them through other programs and partnerships where possible. In addition, we are committed to responsible sourcing practices and transparent reporting on equity - again, adjusting along the way as we learn more and engage further with our customers and communities.

Requiring other programs, different ownership models, or other components of future Capacity*Connect phases is premature and unnecessary.

C*C will not replace or preclude third-party DER programs or projects. We understand parties' concerns that C*C assets will consume hosting capacity on the distribution system. Through strategic siting and advanced operational capabilities

⁶ Cooperative Energy Futures, Environmental Law and Policy Center, Institute for Local Self Reliance, Solar United Neighbors, and Vote Solar (“ELPC et. al”) Comments at pp. 18-20.

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with the limited deployment of a Grid DER Management System (DERMS), we aim to not negatively impact hosting capacity; however, operational complexities associated with MISO market operations limit our ability to state *definitively* that these assets will never consume hosting capacity. Our feeder selection process, as originally conceived and explained in our Petition, will consider queue length and available hosting capacity. So we anticipate that we will be able to avoid feeders that have long interconnection queues and/or limited available hosting capacity. We also note that this could positively impact distribution value by deploying DER where they have not been (thus the feeders have existing hosting capacity) and will not be in the near term (thus the feeders have a short interconnection queue).

We request that the Commission approve Company ownership of Capacity*Connect Phase 2. Prescribing design parameters for future phases or requiring other types of programs at this stage to accommodate third-party developers is not necessary or productive. Contrary to the implication of some parties in Comments, third-party developers and customers have ample opportunity to participate in DER programs and access our distribution system today through their own projects or working with customers. We already have over 1.3 gigawatts (GW) of DER on our system today with another 1 GW in queue, nearly all of it owned by third parties, and that will continue to grow. For example, on December 19, 2025, we launched a Request for Proposals for system assets – including distribution-connected standalone storage, solar, and solar-plus-storage hybrid projects, among others – to support our overall system needs and compliance with Minnesota’s Distributed Solar Energy Standard (DSES). This opportunity totals up to 4,100 MW of opportunity for developers to offer their projects.⁷ Residential DER programs including Solar*Rewards, Cost Sharing Fund, and the Battery Storage Incentive Program further support customer- and third-party-owned DER. The Company’s proposal to own 50-200 MW of BESS does not harm these programs and could – through advancements in people, processes, and tools necessitated by C*C – ultimately support future expansion of third-party projects and programs as we build the grid of the future.

RES Rider recovery is appropriate.

Finally, some parties’ position that standalone storage like Capacity*Connect does not qualify for recovery rider recovery under Minn. Stat. § 216B.1645, subd. 2a, is incorrect and counterproductive to Minnesota’s renewable and carbon-free energy standards. Standalone storage directly enables our compliance with Minnesota’s

⁷ See <https://mn.my.xcelenergy.com/s/renewable/developers/2025-nsp-rfp> and Docket No. E002/M-25-429.

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standards by providing necessary firm dispatchable attributes that would otherwise need to be met by natural gas generation. Nevertheless, C*C Phase 2 is a learning phase and fits the parameters of an energy storage pilot program laid out in Minn. Stat. § 216B.16, subd. 7e. We appreciate the Department's support of RES Rider recovery.

We respectfully request that the Commission approve Capacity*Connect Phase 2 as proposed in these Reply Comments. Our proposal:

- Is consistent with the Settlement Agreement and Commission Order;
- Protects and benefits customers, and keeps safety and reliability at the forefront;
- Can improve equity and environmental justice;
- Enables innovation and learning that will continue to benefit customers as the grid evolves; and
- Supports Minnesota's energy policy goals and standards.

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COMMENTS

Distributed Capacity Procurement (DCP) represents a new paradigm in utilities' use of distributed energy resources (DER) to build the grid of the future and serve all customers' needs. We appreciate parties' enthusiasm for the concept overall.

In these Reply Comments, we

- Explain how our Capacity*Connect Phase 2 proposal protects customers
- Why Company ownership of Phase 2 assets is appropriate
- How we are committed to improving equity and environmental justice through C*C, and
- How standalone storage supports Minnesota's clean energy goals

We largely maintain the proposal put forth in our Petition, including the size of the program (50-200 MW of BESS grid assets), the primary use case (MISO market participation while seeking to realize stacked distribution benefits through strategic siting), and ownership and implementation structure. We appreciate parties' enthusiasm for the concept of DCP, but the various alternative program structures and requirements recommended by commenters should not be adopted. The Commission's approval of our proposal would enable the Company to begin implementation of Capacity*Connect. To the extent the Commission wants to pursue other BESS-based programs that parties have ideated, that is best done separately in other proceedings or forums.

I. OUR PROPOSAL PROTECTS CUSTOMERS

We appreciate the strong engagement stakeholders have brought to the C*C filing and thank parties for well-reasoned comments, practical suggestions, and candid criticisms. The Company views early BESS deployment not as a fixed endpoint, but as a deliberate opportunity to learn, reduce risk, and strengthen execution through experience in a phased, evolving approach.

However, many critiques or proposals of various stakeholders reflect an inaccurate assessment of C*C and instead reflect a preference for a wholly different program aligned to the commercial and economic needs of specific participants or business models. To be clear, that is not what C*C is intended to be. We have structured C*C deliberately to protect customers and ensure that its benefits directly accrue to customers. Specifically, the structure of Phase 2 protects customers by:

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- Focusing on the most beneficial use case – bulk system value through MISO market participation – while assessing stacked distribution benefits through strategic siting.
- Relying on competitive sourcing for a significant portion of the program budget.
- Ensuring transparency through measurement, verification, and reporting.

We address each of these topics below.

A. Focusing on Bulk System Value Benefits Customers, is Consistent with the Settlement, and Enables Operational Advances

C*C is designed as a deployment of utility distribution infrastructure, optimized solely for system-wide benefits creating value for all customers, not a traditional solar incentive program for individual customers tied to third-party developer business models. Critically, C*C does not displace or constrain any existing incentive programs for third-party ownership models, customer DER participation, or alternative procurement pathways. As many parties have noted in their comments, there are several potential use cases for BESS deployed on the distribution system. However, the Capacity*Connect Phase 2 proposal is not the appropriate venue to explore these use cases. Pursuing these other use cases would detract from and impede the realization of the primary Capacity*Connect use case of bulk system value. Further, the Company is actively exploring some of these cases through other programs, venues, and proceedings as described below and in Attachment C. (We discuss additional programs and incentives specifically available to third parties in Section II.D below.) Examples of other BESS use cases that are being pursued already include:

- **Non-wires alternative (NWAs).** As discussed in our 2025 Integrated Distribution Plan (IDP), the Company is committed to pursuing the potential benefits of NWAs. Despite receiving no submissions from developers in response to our NWA Request for Information in 2025, we have proposed to issue a request for proposals (RFP) to gauge market interest in developing two NWA projects no later than June 1, 2026.⁸
- **Mobile battery.** We proposed certification of a mobile battery investment with our 2025 IDP. The combination of expected load growth and ongoing supply chain challenges for utility infrastructure presents a new and pressing need for a flexible solution like the mobile battery, which can help the Company maintain

⁸ 2025 Integrated Distribution Plan, Docket No. E002/M-25-142 (October 31, 2025) (“2025 IDP”), Chapter 8.

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reliability and responsiveness to address capacity constraints and temporary mitigations.⁹

- **Flexible interconnection.** As discussed in our 2025 IDP, we are targeting to deploy dynamic flexible interconnection for 1 MW+ DER sites, including a limited rollout planned for 2026. Once DERMS is operational and FI has been successfully implemented and its performance verified, the Company may consider expanding beyond the initially targeted areas as new opportunities emerge. This work would happen in parallel with C*C.
- **Reliability and resilience.** Our robust reliability programs, as discussed in the IDP, ensure reliable service.¹⁰ The Empower Resiliency program provides resiliency as a service to interested customers. C*C assets will be installed front-of-the-meter and will not have direct customer resilience or reliability benefits.
- **Customer participation.** The forthcoming Battery Connect program will allow residential and small commercial customers to earn incentives by granting the Company access to their on-site BESS for demand management applications.

The Company's foremost obligation is to ensure safe, reliable, affordable service for all customers, not to optimize outcomes for individuals or for-profit entities. If we were to take all the recommendations of all parties, we would be tackling every possible use case for BESS with this phase of Capacity*Connect, which is neither practicable nor in the best interest of customers. The basic premise of DCP is to deploy assets strategically to benefit all customers and maximize the efficiency of existing infrastructure as much as possible – as we do with utility-scale assets.

This premise aligns with our proposal and the Settlement that was approved by the Commission, which says,

The DCP program is envisioned as a way to align the growth of [DERs] on our system with locations which can provide the most benefit to our customers as a whole. The DCP program would actively work to procure DERs and target them to maximize the efficiency of existing infrastructure.¹¹

Deploying assets for piecemeal individual use cases may have other value – indeed, we are using BESS for other use cases through other programs – but it is not DCP.

To maximize benefits to customers, offering the C*C assets into MISO must be the priority dispatch strategy at all times of the year. Separating out individual archetypes

⁹ 2025 IDP, Attachment F: Certification Request – Mobile Battery System.

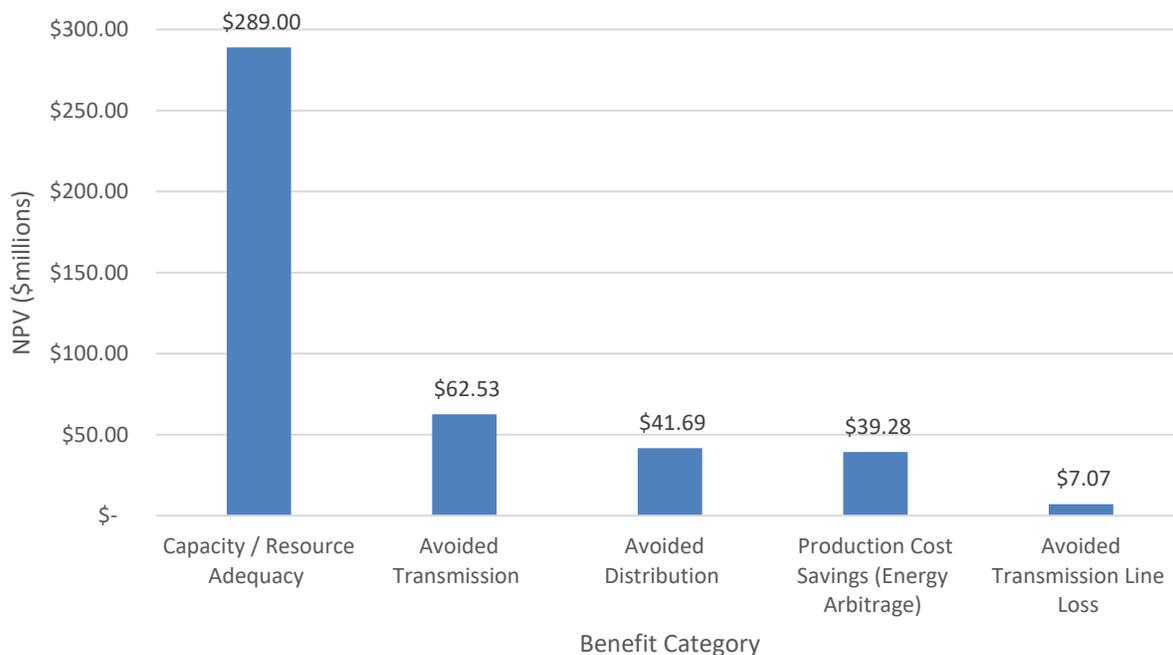
¹⁰ See 2025 IDP, Chapter 2.

¹¹ Docket Nos. E002/RP-24-67 and E002/CN-23-212, Settlement Agreement (October 3, 2024).

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or focusing on other use cases as suggested by the Department and other parties would erode the cost-benefit ratio. As shown in our cost-benefit analysis, the total benefit value of capacity and resource adequacy (i.e., MISO market participation) is over four times more beneficial than the next highest-benefit category modeled in our analysis, as shown in Figure 1 – accounting for over 65 percent of the total modeled benefit value.

Figure 1
C*C Modeled Benefits



We emphasize that C*C’s value is not solely capacity/resource adequacy – a core tenet of the program is to stack benefits where possible, further maximizing the efficiency of existing infrastructure as we advance toward more dynamic operations. We also believe that the benefits included in our CBA should not be seen as a ceiling. As explained in our Petition, there are qualitative benefits, and – as always – we will seek to maximize and quantify further benefits for our customers as we learn and scale.

Strategic siting becomes a key lever as we seek to further maximize benefits in Phase 2, because MISO market requirements will dictate the commitment and obligations of the BESS. To be clear, we do not have the operational technology, process, or procedures in place today to co-optimize an asset in the MISO market and also dispatch it for other use cases (e.g. dynamically managing distribution system constraints); we must always hold that asset ready to comply with MISO’s market rules. However, Capacity*Connect Phase 2 will begin to identify the pathways in

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terms of process, people, and technology to more dynamically manage these assets between the requirements of the bulk system and the distribution system. Siting and operating the BESS with the aim to stack benefits and minimize adverse distribution system impacts is complex. As we explained in our Petition and discuss further below, our feeder selection process will include analysis of feeders whose peaks generally align with NSP system peaks.

We have begun some early analysis to this end. The early analysis has limitations – for example, it is based on limited AMI data from one recent 365 day period – but we offer this early example to help illustrate the complexity and explain how we plan to approach feeder identification. Figure 2 shows the number of distribution feeders and approximate alignment with historical system peaks, based on initial analysis, to illustrate *roughly* how many feeders could be included – or excluded – in the first step of our selection process, which we discuss further below.

Figure 2
Illustrative Feeder Peak Alignment with NSP System Peak

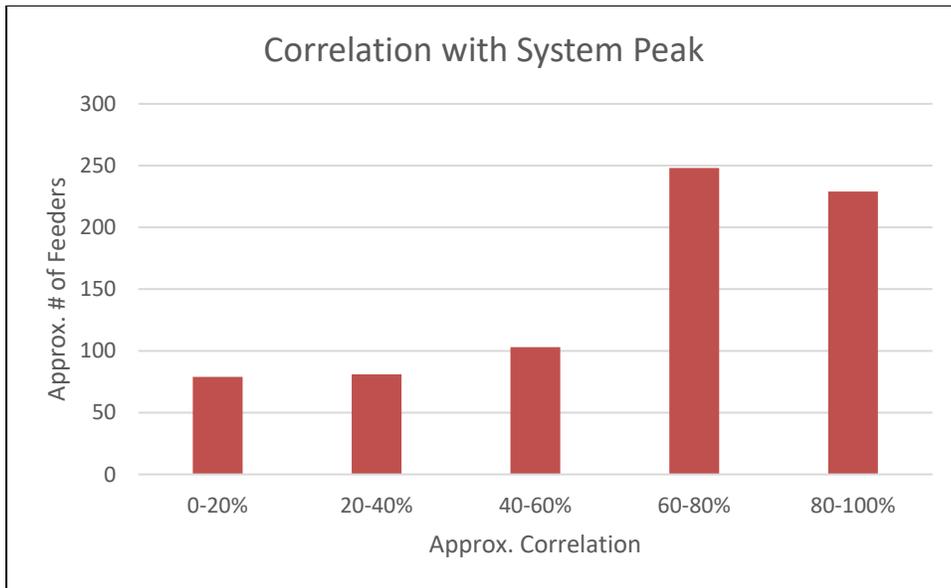


Figure 3 shows an illustrative example of one feeder profile overlaid on the bulk system profile to show overlaps.

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Figure 3
Illustrative Example of Feeder Profile Overlap with System Profile

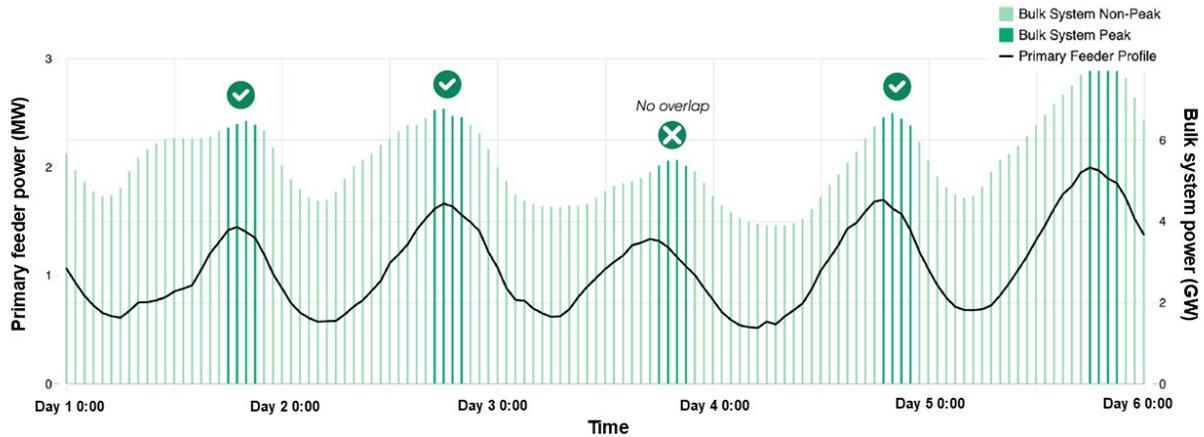


Figure credit: Gridsight

1. *MISO Participation Pathways*

The Department wondered if we will leave customer value on the table with our chosen market participation strategy and requests additional information on various market participation approaches, which we provide below.¹² We first clarify that, while we believe, based on conversations with MISO, that C*C Phase 2 assets will be able to participate and deliver direct value to Xcel Energy customers as DRR-1 resources, we have not been able to determine with certainty a market participation strategy, because we do not have the information needed from MISO to determine which pathway will offer the most customer value. We believe MISO will have to implement tariff changes, in compliance with Federal Energy Regulatory Commission (FERC) Order 2222, that are designed to address many of the barriers for DER to participate in the market that exist today. However, at present, there are limited options to choose from – and as we discuss below, lacks the clarity needed to fully understand the implications.

We have continued to work with MISO to determine the most viable and cost-effective path that exists today, that will maximize revenue for customers and minimize risks. For instance, we do not have clarity on whether FTM BESS not directly paired with load behind the retail meter can participate at all in MISO's Load-Modifying Resource (LMR) or Demand Response Resource (DRR) markets. We are also exploring the implications of MISO's planned LMR reforms on DRR Type 1

¹² Department Comments at pp. 7-8.

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resources, which we understand would assume the obligations of a dual DRR/LMR option under today's rules – the implications of which we are still exploring.¹³ In making this determination, the Company is evaluating both the financial considerations of certain market products as well as the operational considerations and their corresponding implications as discussed further below.

a. Financial Considerations for Ancillary Services Revenue

The Department suggested that ancillary services revenue available through the ESR model could outweigh other costs associated with ESR market participation. The Company is not yet ready to commit to ancillary services participation due to two important considerations. First, higher value ancillary services products such as regulation are relatively limited markets. In MISO, the regulation floor is set at 600 MW.¹⁴ The regulation requirements are already met by existing resources, meaning that if another 200 MW of batteries were to enter the market seeking to maximize revenue from regulation services, it would result in downward pressure on prices. Second, unlike capacity revenue, ancillary services revenue is uncontracted and therefore subject to volatility for changes in underlying market dynamics. That said, ancillary services products will evolve with the continued integration of variable resources and BESS may have expanded opportunities in the future. Thus, while there may be opportunities for C*C resources to provide ancillary services depending on the chosen participation pathway, the Company will have to evaluate those during implementation and ongoing operation of the assets, keeping customer value top of mind.

b. Operational Considerations

As we evaluate different market participation models, we must balance revenue opportunities with the practical realities of operating the system. Today, our commercial operations team manages roughly 120 market resources across the NSP System.¹⁵ The DRR Type 2 and Energy Storage Resource (ESR) market models do not allow for asset aggregation, meaning each of the up to 200 C*C BESS assets would need to be *individually registered and operated*. This would be nearly twice the

¹³ Under the proposed rules in Docket No. ER25-1886 with an effective implementation in planning Year 28/29.

¹⁴ https://www.potomaceconomics.com/wp-content/uploads/2025/06/2024-MISO-SOM_Report_Body_Final.pdf.

¹⁵ The NSP System is the integrated electric generation and transmission system jointly planned and operated by Northern States Power Company–Minnesota (NSPM) and Northern States Power Company–Wisconsin (NSPW), which serves customers across our five Upper Midwest states: Minnesota, North Dakota, South Dakota, Wisconsin, and Michigan.

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number of assets we currently manage within the MISO footprint – but only about 2 percent of the total NSP System capacity managed by the Company today. Managing this large increase in the number of assets is simply not practicable with the current resources the Company has in place for commercial and distribution operations. Adding additional staff will result in higher costs to customers, while the incremental benefits of doing so are speculative – and realistically, expected to be non-consequential for at least Phase 2. As we noted above, even if the Company were to add additional resources, by the time the Company could actually hire and train these resources, MISO will have implemented tariff changes that comply with FERC Order 2222 that is intended to address many of the barriers that exist today.

That said, we have reviewed five potential market pathways:

- **DRR Type 1:** Distribution connected battery energy storage can qualify as a capacity resource via the DRR Type 1. The Company understands that if registered as a DRR, these resources could also be eligible for participation in the energy or operating reserve markets (but not both). The dispatch and telemetry requirements of DRR Type 1 are also less onerous relative to the requirements under the ESR model; however, as noted above, we do not have a definitive answer from MISO on whether C*C assets would qualify as a DRR Type 1 because they are in front of the retail meter. Based on what we currently know, the DRR Type 1 model is preferred due to the ability to aggregate the assets and the less onerous metering and telemetry requirements.
- **DRR Type 2:** The DRR Type 2 model does not allow for asset aggregations. This type of resource is capable of supplying a range of energy and must be capable of complying with MISO's Setpoint Instructions. The metering and telemetry requirements are similar to those of the ESR model discussed below. Given the impracticability of operating the assets individually, we do not intend to pursue this option.
- **ESR:** The ESR model does not allow for asset aggregations. Distribution connected battery energy storage can participate today via MISO's ESR model that was implemented in 2022 to comply with FERC Order 841 (Electric Storage Participation in Markets Operated by Regional Transmission Organizations and Independent System Operators). Using the ESR model would require the Company to register and dispatch each battery individually, which, as discussed above, would create a level of operational complexity that renders this option infeasible. In MISO, ESRs must be fully dispatchable, provide continuous real-time generation and state-of-charge telemetry, maintain

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two-way communications with MISO, and operate within the registered charge, discharge, and energy limits for both Day-Ahead and Real-Time market participation. Each asset would also need to complete Attachment HHH (“Form of Agreement for Electric Storage Resource Located on a Distribution System”).¹⁶ Since MISO implemented this model in 2022, there have been only six distribution-connected storage projects that have completed Attachment HHH agreements.¹⁷

- **LMR:** Our demand response resources participate as LMRs today. These resources receive capacity payments and must make themselves available to the system during emergency conditions. They do not participate in the energy and ancillary services markets, and therefore, are not eligible for energy revenue, so this pathway would provide less market revenue.
- **FERC Order 2222 Distributed Energy Resource Aggregation (DERA) Model:** MISO is in the process of implementing changes required to comply with FERC Order 2222 (Facilitating Participation in Electricity Markets by Distributed Energy Resources). These changes are not expected to be implemented until 2029, but offer a third, mutually exclusive pathway for distribution connected battery energy storage resources to be compensated for energy, capacity, and/or ancillary services. The Company is not pursuing this option at the moment as it would result in a two-year delay in realizing market revenues. However, we will work closely with MISO as they continue to implement FERC Order 2222 to explore any potential longer-term benefits that may come via that model.

We will continue to work with MISO to gather information to solidify the market participation model for C*C, but note that the participation model may change as we learn more and market models evolve.

2. *Distribution Value and Distribution-Specific Use Cases*

Some parties noted that C*C can or should be used to benefit the distribution system in various ways, including by deferring capacity projects as an NWA; addressing

¹⁶ https://docs.misoenergy.org/miso12-legalcontent/Attachment_HHH_-_Form_of_Agreement_for_Electric_Storage_Resource_Located_on_a_Distribution_System.pdf.

¹⁷ See [https://www.misoenergy.org/legal/rules-manuals-and-agreements/service-agreements/#nt=%2Fagreementtype%3AElectric%20Storage%20Resource%20Agreement%20\(HHH\)](https://www.misoenergy.org/legal/rules-manuals-and-agreements/service-agreements/#nt=%2Fagreementtype%3AElectric%20Storage%20Resource%20Agreement%20(HHH)). Last accessed January 2, 2026.

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distribution reliability issues; and/or improving hosting capacity to enable more distributed generation.

To be clear, Capacity*Connect has distribution system value. But focusing some or all of C*C siting and operations *solely* to maximize distribution system value is inconsistent with the DCP concept; would be less cost-effective; and would overcomplicate Capacity*Connect at this early stage. As discussed above, Capacity*Connect is designed to realize stacked benefits where possible but ultimately provide capacity and energy to meet all our customers' needs. Separate tranches or archetypes would not only be inconsistent with the concept overall but would also overcomplicate this already complex initiative and should not be approved. As discussed above, realizing multiple benefit streams is an important way to maximize cost-effectiveness to the benefit of our customers.

Cooperative Energy Futures, Environmental Law and Policy Center, Institute for Local Self Reliance, Solar United Neighbors, and Vote Solar (“ELPC et al.”) recommend that the Company prioritize distribution value in Phase 2 of Capacity*Connect and undertake additional analysis to identify quantifiable, Minnesota-specific distribution value.¹⁸ The Department of Commerce recommends a specific archetype use case focused on reliability and transmission and distribution system investment deferral. We address these recommendations below.

First, we clarify that Capacity*Connect is not an NWA program, nor should it be modified to become one. NWAs for the most part have remained challenging to implement industry-wide. While a few notable examples of NWAs have been implemented over the last decade, NWAs have yet to be implemented at the type of scale that Capacity*Connect envisions. More critically (and assuming that the timing, location, and load forecast align), a successful NWA would mean that the BESS would be required to follow and reduce/relieve load in specific hours that may conflict with potential MISO requirements for resource adequacy. This issue of “objective hunting” is one of the unique challenges of trying to maximize value between the bulk system and the distribution system that many parties seem to overlook.

NWAs seek to defer a specific project that has been identified in the Company's distribution system planning process. In this regard, each NWA is a somewhat bespoke opportunity that requires a bespoke solution. This inherently makes NWAs a less scalable solution to solving bulk grid needs relative to other non-traditional

¹⁸ ELPC et al. Comments at pp. 18-20.

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solutions. Moreover, with a 1-3 MW BESS on a feeder, the BESS will not fully offset or defer the need for the majority of future capacity projects. As discussed in our IDP, NWAs need to be designed to fully address the risks (both N-0 and N-1) that the planned capacity project is designed to mitigate, and it must be sized to account for uncertainty in forecasts. As shown in our NWA analysis in our 2025 IDP, most NWA solutions would require a larger amount of solar and/or storage capacity to offset the need for a capacity project.

We plan to issue an RFP for two NWA projects in 2026.¹⁹ Capacity*Connect is not an NWA program and does not need to be an NWA program because the Company is already working toward implementing NWAs through its forthcoming RFP and ongoing analysis as required by the Commission.

We also clarify that Capacity*Connect will not have a demonstrable or direct impact on improving reliability or resilience at the feeder, tap, or customer level because it will not be designed to island such that an individual BESS could provide backup power in the case of an outage. Similarly, Capacity*Connect Phase 2 is not a customer resilience program; though the assets will be sited at customer locations, they will not have a direct connection to customer sites. The BESS assets will contribute energy and capacity to the overall system, which enables us to provide safe, reliable service to all customers.

Further, Capacity*Connect should not prioritize distribution system value over bulk system value in general. In a future state, it is possible we may be able to operate these assets more dynamically in real-time to maximize and co-optimize across benefit streams. Today we are not aware of any protocols or other grid operators that are dynamically dispatching multiple DER across the bulk and distribution grids, and the industry at large has yet to develop strategies for dynamic co-optimization between bulk and distribution benefits. Initial experience through C*C Phase 2 will help us develop safe operational parameters and DERMS requirements that could be used in future phases of C*C as well as potentially for third-party resources and FERC Order 2222 compliance.

Second, we agree that calculating an NSPM -specific distribution benefit value would be useful for C*C and elsewhere such as the Integrated Distribution Plan (IDP) and future programs. ELPC et al. recommend a slate of analysis, but the Company is best positioned to determine the most appropriate analysis needs and specific methodologies, so the recommendations of ELPC et al. should not be adopted in full.

¹⁹ See 2025 Integrated Distribution Plan, Docket No. E002/M-25-142 (October 31, 2025), Chapter 8.

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Instead, we commit to conduct analysis on C*C Phase 2 projects using specific data and context to estimate the distribution benefit provided by these projects by with our 2027 IDP. In the 2027 IDP, we will explain our analysis and how it may guide future C*C siting. The analysis will utilize operational data from the Phase 2 projects and evaluate the ability and constraints related to simultaneously capturing value from avoided generation, transmission and distribution. We will include a plan for ongoing updates and refinements to that analysis. In this way, we will accomplish the spirit of the ELPC et al. recommendation through established analysis processes. ELPC et al. recommended that this analysis be completed by July 1, 2027, but completing this analysis in conjunction with the IDP on November 1, 2027 will provide a more holistic picture and allow for consistent analysis.

a. Comparison to Colorado Aggregator Virtual Power Plant Program

Some parties suggest the Colorado Aggregator Virtual Power Plant (AVPP) program that will be launched in our Colorado operating company would be preferable to Capacity*Connect. While both AVPP and Capacity*Connect are types of VPP programs, they are fundamentally different, and comparisons are misplaced.

The Colorado AVPP program is a short term, pay for performance program with contract lengths of five years. Performance-based payment rates are set by the program and held constant over the five-year term of each aggregation. Aggregations are technology agnostic and may contain new or existing equipment that aggregators will control and utilize to provide demand reductions or energy injection during a limited number of events called by the Company. The Capacity*Connect Phase 2 proposal assumes that DCP assets will be newly constructed and have a 20-year asset life. The assets will be utilized by the Company to benefit customers for 20 years. Multiplying the AVPP costs by four, the costs are similar. The maximum capacity payment that would be paid to an aggregator for the Generation Capacity Incentive, Transmission Capacity Incentive, and Distribution Capacity incentive is \$240/kW-yr, which is higher than the levelized cost of capacity of Capacity*Connect Phase 2. Table 1 provides a comparison of Capacity*Connect Phase 2 and the Colorado AVPP program.

Table 1
Capacity*Connect Phase 2 and Colorado AVPP Comparison

	Capacity*Connect Phase 2	Colorado AVPP
Asset Types	FTM BESS	BTM DER

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Asset Size	1-3 MW per site	750 kW max individual DER size
Program Scale	50-200 MW by 2028	125 MW by 2030
Dispatch Strategy	Dispatched in response to MISO obligations ²⁰	Utility dispatch via third-party aggregator during limited number of events called by the Company
Use Case	Dispatch based on MISO market; seeking distribution benefits through strategically siting where peaks overlap	Dispatch driven by bulk system need; distribution benefits for areas where peaks overlap
Program Timeline/Asset Life	20 years	5 years with option to extend
Cost²¹	[PROTECTED DATA BEGINS PROTECTED DATA ENDS] leveled cost of capacity	\$240/kW-yr maximum possible capacity incentive payment paid to aggregators

Furthermore, Capacity*Connect will be more complex to operate and coordinate than the Colorado AVPP because of the participation of these distribution assets within MISO, as discussed above.

Finally, we note that under the AVPP program structure, the avoided cost benefits of AVPP do not flow to all customers like we have proposed in Capacity*Connect; instead, the avoided costs are paid to developers as performance payments, so it is understandable that the developer community prefers AVPP to Capacity*Connect, which flows benefits to our customers instead of third parties.

3. Interconnection and Hosting Capacity

Some parties suggest that Capacity*Connect should be, in whole or in part, a distributed generation-enablement program, designed and operated to increase

²⁰ Specifics depend on MISO participation pathway.

²¹ Joint Solar Parties (JSP) included an incorrect cost comparison in its Comments, stating that C*C Phase 2 cost is \$2,150 per kW for 200 MW compared to \$624 per kW for 125 MW for AVPP. This comparison reflects deployment costs for a 20 year, 200 MW C*C program compared to five-year performance payments for AVPP. (See JSP Comments at p. 8.) Multiplying the five-year AVPP costs by four to equal 20 years – which is still an imperfect comparison but more illustrative – results in a cost of \$2,150 per kW for C*C compared to \$2,496 per kW for Colorado AVPP.

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hosting capacity or reduce the necessity of certain studies.²² Parties also expressed concern regarding the impact to hosting capacity of C*C as proposed.

Capacity*Connect should not be used as a grid upgrade program funded by our customers with the sole purpose of enabling the interconnection of distributed generation or other DERs that do not necessarily benefit all customers. That said, we understand that the developer community is concerned about C*C assets consuming hosting capacity. We can appreciate this concern and for Phase 2 we plan to select feeders to potentially avoid consuming hosting capacity on constrained feeders. Further, deployment of C*C assets will not reduce the need to review and conduct System Impact Studies. Each C*C project would also pay for the upgrades identified in any System Impact Study pertaining to it, though we intend to avoid locations that would require significant upgrades.

While we would like to be able to say definitively that C*C assets will not reduce hosting capacity for third-party DER, the siting and operational reality is more complex. The BESS will be dispatched according to MISO's schedule; failure to respond to MISO's dispatch signals or commitments could result in penalties. The DERMS is expected to provide interoperability and reliability functions to ensure MISO dispatch instructions are executed at the BESS level while keeping operations within distribution system limits. The scope of functions will depend on the participation model which will drive the technical requirements.

As discussed above, selecting feeders to maximize value for our customers is complex and is further complicated by our commitment to minimize adverse impacts to the distribution system and our goal to have a neutral impact on hosting capacity. Company ownership of these assets allows us to manage constraints on our grid without complicating factors such as curtailment thresholds, contract terms, or other agreements. We plan to work toward operational advancements to optimize dispatch and curtailment across all system assets.

The feeder selection process will prioritize circuits whose peak demand closely aligns with the bulk system peak, leveraging analysis from Gridsight to identify strong correlations. An early example of this analysis is shown in Figure 2 above. In addition, feeders with greater utilization, a short or no interconnection queue, and at least 1 MW of available hosting capacity will be emphasized to ensure meaningful system benefit and help us avoid feeders that have queues for third-party projects. Circuits

²² JSP recommends that the Company deploy use cases to relieve feeder congestion and increase hosting capacity (JSP Comments at p. 16). The Department of Commerce recommends an archetype focused on DER congestion and hosting capacity (Department Comments at p. 12).

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that do not currently have mitigation projects in the budget will also be targeted. In addition, feeders located in EJ areas will be included to support equity objectives.

Despite the clear selection criteria, several complexities introduce uncertainty into planning and impact the potential value of distribution-connected battery systems. One major challenge is the uncertainty surrounding dispatch and system-wide coordination, which forces planners to assume worst-case operating conditions. Changes in the local distribution system can also diminish or eliminate the anticipated benefits. For example, if a large customer leaves the system, feeder utilization and demand-mitigation value may drop significantly. Conversely, the addition of a major new customer could restrict when or how the battery is allowed to operate due to new loading constraints. Customer behavior trends add another layer of complexity—if a feeder shifts from summer to winter peaking, overlapping transmission and distribution benefits may be lost, and new winter peaks could even emerge during the battery’s charging periods. Together, these uncertainties make the planning process highly dynamic and highlight the need for flexible strategies when siting and deploying Capacity*Connect assets. In addition, one of our learning objectives in Phase 2 is to understand how charging and discharging of the C*C BESS impacts – positively or negatively – hosting capacity at the feeder level. As we gain operational experience with more assets, our plans and operations will evolve and grow. These flexible strategies will enable us to evolve quickly to maximize benefits as we learn more as we scale up in Phase 2.

We emphasize that one of our learning objectives in Phase 2 is to understand how charging and discharging of the C*C BESS impacts – positively or negatively – hosting capacity at the feeder level. As we gain operational experience with more assets, our plans and operations will evolve and grow.

B. Capacity*Connect Includes Competitive Sourcing

As an important way to protect and benefit customers, approximately 80 percent, or roughly \$340 million, of the total program budget is planned to be competitively bid, including engineering, procurement, construction, equipment supply, and ongoing service and maintenance. As discussed in Section II below, we are still in the process of developing a procurement framework in collaboration with Sparkfund.

1. Sparkfund’s Role as Implementation Partner

The Company’s selection of Sparkfund as its implementation partner is appropriate. The C*C program was conceived and developed through a collaborative effort

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between the Company and Sparkfund over the course of 2024. Xcel Energy has a working history with Sparkfund through the Empower Facilities program, which was a “facilities-as-a-service” program under the Energy Conservation and Optimization (ECO) portfolio. Given the strategic timelines for the deployment of C*C Phase 1 and 2 and the nature of Sparkfund’s role in building and qualifying a competitive portfolio of vendors capable of bidding into tranching deployments, the Company determined that Sparkfund offered the unique capability to advance the C*C. This partnership reflects both companies’ shared commitment to advancing scalable, utility-led innovation in DER deployment while maintaining the highest standards of safety, reliability and customer benefit.

The Department of Commerce requested that we include in these Reply Comments “information on mechanisms to ensure transparency and accountability, as well as market-rate justification for the costs associated with Sparkfund’s role, including but not limited to engineering, procurement, and construction services.”

We discuss measurement, verification, and reporting as mechanisms for transparency and accountability below. We further note that Company ownership of these assets directly enables transparency and accountability compared to third-party ownership models, which would reduce transparency, fragment accountability, and limit the Commission’s oversight.

Regarding Sparkfund’s role specifically, as detailed in the Petition, the Company and Sparkfund are in the process of finalizing commercial agreements. The estimated cost included in the Petition for the Implementation Partner Fees are still under negotiation and activities listed therein reflect the scope and level of expertise required to administer and implement C*C. The proposed cost basis is structured to support the deployment of between 50-200 project sites, necessitating concurrent efforts across various categories of work, including program design; site evaluation, selection, and engagement; procurement and contracting; project construction and delivery, and operations and maintenance.

The Company emphasizes that C*C represents a new and innovative implementation model that is novel in structure, scope integration, and delivery relative to prior programs. The foundational intention with this novel approach is to embrace competitive market constructs in order to achieve cost competitiveness across C*C related workstreams and procurements. Because C*C integrates functions that are not fully captured by traditional program administration frameworks, a single set of direct historical or market-based program costs is not practicable as an exact point of comparison.

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The Company reiterates that approximately 80 percent of the total deployed spend of the program will be competitively solicited and solicitations will occur with enough frequency to ensure systematic and regular price discovery. The rolling structure of solicitations distinguishes C*C from other program designs and market participation approaches in favor of cost prudence and competitiveness. This structure protects customers through continuous price optimization rather than a point-in-time large scale procurement.

The program design also incorporates mechanisms intended to enhance transparency and ensure cost prudence, including:

- Standardized “Conforming Project Design” with a cost basis aligned with the Petition’s CBA;²³
- Required Company approval or disapproval on “Non-Conforming Projects;”
- A requirement that unused contingency or cost savings relative to the “Conforming Project Design” be returned to customers; and,
- Reporting and oversight provisions, as described in the Petition, intended to support program tracking and enable prudent management if project cost trends deviate materially from assumptions reflected in the Cost Benefit Analysis.

Consistent with the transparent program design articulated in the Company’s Petition, the estimates Implementation Partner Fees were presented in connection with defined workstreams, anticipated site volumes, and core activities required to deliver positive outcomes.²⁴ When taken as a whole, the Company is confident the fee structure reflects actual labor and overhead required to deliver the defined work product and compensates Sparkfund for assuming meaningful delivery, schedule, and compliance risk. Importantly, the proposed fee structure provides cost-effective and holistic execution, accounting for the centralized approach the Company is deploying with C*C.

All information related to any competitive procurement process will be made available to Xcel Energy for evaluation and confirmation that Sparkfund’s processes meet Company standards. Such information will be inclusive of, but not limited to, all bid related documents, correspondence with vendors, RFP and RFI templates and results, all drawings, designs, specification and equipment information, etc. By supporting Xcel Energy, Sparkfund will represent the Company and all information gathered

²³ See TRADE SECRET Attachment C to the Company’s October 3, 2025 Petition.

²⁴ See TRADE SECRET Attachment B to the Company’s October 3, 2025 Petition.

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regarding the C*C Program will belong to Xcel Energy and be reviewed internally by Xcel Energy to ensure policy adherence on behalf of our customers.

Xcel Energy and Sparkfund will work together to ensure that all projects are developed in a manner to receive the Investment Tax Credit (ITC) as modeled in the cost-benefit analysis. Optimizing these projects for the ITC add a layer of uncertainty and complexity to the procurement process as the Company awaits further guidance from the Government. Rulemaking decisions may require modifications to the procurement strategy as the Company navigates developing these system-connected assets.

Finally, the Company notes Xcel Energy – along with over 50 other companies including some of the largest U.S. utilities²⁵ – participates as a limited partner in Energy Impact Partners (EIP), a private investment platform focused on advancing technologies that support the clean energy transition. Through this partnership, Xcel Energy holds rights to participate in advisory committees, which provide strategic input on investment priorities and emerging technologies. This investment aligns with Xcel Energy’s commitment to innovation and decarbonization, enabling access to collaborative insights and opportunities across the energy sector. The partnership does not involve operational control of portfolio companies; rather, it reflects a financial and strategic investment intended to accelerate innovative solutions that ultimately benefit our customers and support both Xcel Energy’s and the state of Minnesota’s carbon free goals.

EIP is an investor in Sparkfund, as well as other companies. We emphasize that our partnership with EIP does *not* involve operational control of portfolio companies and we do *not* direct EIP’s investment decisions. However, our limited partnership with EIP may in turn constitute an indirect stake in Sparkfund that is considered an affiliate interest. Therefore, once our commercial agreement with Sparkfund is finalized, we will file the contract with the Commission for approval as an affiliate interest agreement.

C. Measurement, Verification, and Reporting will Ensure Transparency

The Company’s Petition included robust reporting: quarterly program implementation updates and an Interim Program Assessment after two years or 20 MW are operational, whichever comes first. We believe our proposed reporting plan is robust. Based on parties’ comments and suggestions regarding additional, modified, or more

²⁵ See <https://www.energyimpactpartners.com/our-partners/>.

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specific reporting, we provide additional detail here regarding our learning objectives based on the above-mentioned uncertainties and unknowns. We explain our modified reporting proposal, including plans for third-party measurement & verification (M&V). The revised reporting plan we propose here considers and reflects the relevant portions of the Department's recommendations; however, the Department's recommended third-party evaluation is unnecessary given our plan to work with a third-party M&V consultant, and would add costs and potentially delays, as we discuss below.²⁶

While we offer some modifications and expansions here regarding our proposed reporting, we acknowledge that the next six-plus months will be formative for the Capacity*Connect program and help us refine our learning and evaluation objectives with a third-party M&V consultant. Thus, we agree to the Department's recommendation that we file a Phase 2 Evaluation Plan within 180 days of Order issuance.²⁷ This Evaluation Plan will refine our plan for the Interim Program Assessment.

1. Learning Objectives

As discussed in our Petition and in these Reply Comments, Capacity*Connect presents complexities at all levels of program execution, so Phase 2 will provide opportunities to learn and adjust as we look to mature the program in the future. Key questions that we will seek to answer through the process include:

- How do varying jurisdictional requirements and local considerations impact siting and deployment timelines?
- What internal procedures, systems, and equipment are needed to coordinate commercial operations and distribution control center operations?
- How can C*C assets be operated to cause least harm and most benefit?
- What is the correlation between MISO resource adequacy hours and distribution constraints, and can we quantify any tradeoffs?
- What is the potential market revenue from MISO participation?
- What is the impact to generation hosting capacity and what is the most effective way to track and mitigate any negative impact? (e.g., through CYME or other analysis tools based on historical data and forecasting versus real-time operational tracking and day-ahead forecasting via DERMS)

²⁶ Department Comments at p. 13.

²⁷ *Id.*

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- What hosting capacity impacts can be directly tied to C*C assets (i.e., correlation versus causation)?
- What evolutions of the system impact study process may be needed as we look toward more dynamic operation for an asset aiming to meet multiple objectives?
- Which MISO resource types and participation models DERMS can enable today, and what enhancements are needed for full compliance?
- What fail-safe functions must be in place to maintain safety and reliability during MISO participation?
- What communication pathways/data exchanges may be needed with MISO during abnormal distribution system events or outages to prevent non-compliance?
- What additional qualitative and quantitative benefits can be realized?
- What is the addressable market for customer host sites and the overlap between system opportunities and interested customers?
- Speed to power: While the capacity contribution of C*C BESS is already captured through accreditation, this earlier availability creates an additional economic benefit by enabling real load to interconnect and operate sooner than would otherwise be possible compared to utility scale. This “speed-to-power” benefit reflects the timing advantage of C*C BESS: economically productive load that would have been delayed by 3–5 years due to regional transmission constraints can instead materialize earlier, generating economic output during years that would otherwise be foregone. Methods to quantify this value in planning and economic analyses are in development.²⁸
- Equity and environmental justice: How can benefits be equitably distributed to advance environmental justice, and what additional equity and EJ benefits can be realized?

These questions will help guide our implementation of C*C and our evaluation plan for our Interim Program Assessment, discussed below.

2. *Quarterly Reporting*

We proposed quarterly progress reporting in our Petition and appreciate the Department’s suggestions regarding quarterly reporting. We support and agree with

²⁸ See, e.g., Brancucci, C., Cutler, D., & Jenkins, J. (December 2025). *Flexible data centers: A faster, more affordable path to power* [White paper]. Camus, encoord, and Princeton ZERO Lab. https://cdn.prod.website-files.com/60dbdcca2e4b1919e8894fa5/6930abf1be0f36db6fc27157_Whitepaper%20-%20With%20Appendix.pdf.

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most of the Department’s recommendations, where applicable. Table 2 below shows each of the Department’s recommendations for quarterly reporting and our position.

Table 2
Department’s Recommended Quarterly Program Status Report Contents²⁹

Department Recommended Quarterly Report Metric	Xcel Energy Position
<p>Deployment & Budget Current deployment status (MW and sites operational) and a detailed breakdown of budget expenditures (Capital and O&M)</p>	<p>We agree to provide current deployment status and operational sites. We can provide current estimates of budget expenditures but note that capital and O&M expenditures will be estimates and future cost recovery filings will provide full details and actuals.</p>
<p>Archetype Performance Specific performance data and benefit calculations for each of the three siting archetypes, including Measurement and Verification (M&V) data validating claimed benefits (for example, realized energy arbitrage revenue, confirmed T&D deferrals, and reduction in reverse power flow).</p>	<p>We agree to report on performance data and benefit calculations where available for our single, bulk system-focused use case.</p>
<p>Grid DERMS Efficacy Operational performance data for the Grid DERMS platform, specifically demonstrating the successful execution.</p>	<p>Operational performance data can include the number of fail-safe actions and loading and voltage violations tracked by grid DERMS.</p>
<p>Interconnection & Hosting Capacity Documentation of the interconnection studies and distribution upgrades required for each site, along with a specific tracking of how each FTM battery installation impacts the available hosting capacity on its respective feeder.</p>	<p>We agree to provide information on interconnection studies and any distribution upgrades.</p> <p>Regarding hosting capacity, this analysis is done as part of our monthly hosting capacity analysis; any changes observed in hosting capacity may not be directly caused by the C*C asset. That said, we will discuss any lessons learned and/or observations regarding hosting capacity narratively in quarterly reports. Details and analysis of C*C’s impacts on hosting capacity overall will be part of the M&V process and</p>

²⁹ Department Comments at p. 13.

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	Interim Program Assessment discussed below.
Labor Standards Compliance: Auditable reporting on compliance with the labor standards outlined in the Petition, specifically quantifying prevailing wage and apprenticeship utilization rates.	We agree to provide auditable wage and apprenticeship data for ITC-covered work, and a narrative discussion of overall labor standards outlined in the Petition.
Equity Progress: Tracking of the specific, quantifiable equity metrics including the percentage of subcontracting dollars awarded to MWBE and status of host community consultations.	We agree to report on equity metrics quarterly, including the percentage of subcontracting dollars awarded to certified businesses and status of host community consultations and engagement. (See section III for additional metrics.)

Attachment A shows the full list of items we propose to include in quarterly reports.

3. *Interim Program Assessment*

The Department of Commerce recommends that we conduct a Comprehensive Third-Party Evaluation in place of our proposed Interim Program Assessment, after 20 MW achieve commercial operation or two years after Commission approval, whichever comes first, and file it for Commission and stakeholder review. We believe our original proposal for an Interim Program Assessment is more streamlined and will provide robust analysis, and it is consistent with past practice and programs approved by the Commission.

The program budget estimate as reflected in the Petition already includes funds for a third-party M&V consultant, which we would work with on an ongoing basis to prepare the Interim Program Assessment. The Department recommends that the 20 MW/two-year evaluation include benefit verification; future market models; DSES pathway analysis; and DERMS interoperability. While the Department’s recommendations are consistent with the direction we would envision for the Interim Program Assessment and what we have proposed in the Petition, it would be premature to adopt those specific recommendations; rather, the Company will file an Evaluation Plan after bringing an M&V consultant on board, within 180 days of Commission Order, as recommended by the Department. We will consider the Department’s recommendations as we develop the Evaluation Plan for the Interim Program Assessment. We note that an important piece of our ongoing evaluation of Capacity*Connect will be to evaluate benefits against the categories that were modeled in the preliminary CBA. This evaluation will be necessary before we move forward with future, follow-on phases of Capacity*Connect.

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We further clarify that we do not intend to stop work on Capacity*Connect while we prepare, or after we file, the Interim Program Assessment. If our proposal is approved, we will proceed with a 50-200 MW Phase 2 deployment. As always, if we encounter new information or challenges that would substantively impact our ability to implement the program as approved, we would provide updates and seek further input from the Commission.

II. COMPANY OWNERSHIP IS APPROPRIATE AND NECESSARY

The Company's proposed Capacity*Connect design, in which the Company owns and operates the Phase 2 assets, is reasonable and appropriate. The Office of the Attorney General (OAG) requested that the Company provide an explanation of why C*C could not include proposals from third parties to procure and own assets at sites chosen by the Company, if those third-party proposals are more cost-effective than Company-owned assets.³⁰ Company ownership enables three core aspects of Capacity*Connect:

- Customer benefits through MISO market participation,
- Speed, and
- Safety, security, and reliability.

We address each of these aspects below.

We also explain the many opportunities that third-party developers have today. Company ownership does not preclude third-party access to our distribution system or participation in the many available programs.

A. Company Ownership Enables Customer Benefits Through Streamlined Market Participation

First, Company ownership enables customer benefits through MISO market participation. Although MISO market revenue is the most valuable operational strategy for the C*C program, this approach creates complexity and there are many open questions regarding specific market participation models and associated requirements, as discussed earlier. Generally, it is the Company's understanding that owners of assets participating in MISO must be the market participant themselves or work with a qualified aggregator or scheduler. We do not know whether the Company could, under MISO's varying market rules, act as an aggregator or scheduler for third-

³⁰ OAG Comments at p. 14.

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party-owned FTM distribution-connected resources today. In the future, new market model(s) anticipated to launch in MISO in 2029 to comply with FERC Order 2222 may present a clearer pathway for the Company to operate third-party assets, but the specifics of that model are still under development. As noted earlier, we will work closely with MISO as they continue to implement FERC Order 2222-compliant frameworks to explore any potential longer-term benefits that may come via that model. In addition, Company ownership allows for one standard operating protocol across systems and integrating the DERMS for the first time compared to potentially a series of one-off technical designs for specific projects. Third-party assets would introduce a spectrum of custom requirements and modifications across the Grid DERMS that would require testing and verification. Rushing this type of work across operating systems presents a significant layer of operating risk the Company can avoid in Phase 2 through Company ownership.

Such a model would also require the development of new tariffs and contracts to allow for active management and to provide compensation to asset owners. While development of such tariffs and contracts is not in itself an impossibility, it would take time and would be complex, and would add complexity to program management long-term; we believe it is beneficial to stand up Capacity*Connect in a straightforward way while we learn, before considering other or additional programmatic models, within or separately from C*C. While this complexity creates challenges, we view this complexity as an important qualitative benefit and goal of C*C: build internal structures and processes and gain experience to advance our operational capabilities as we prepare for FERC Order 2222 market models and the overall expanded role of DER on our system.

B. Company Ownership Enables Speedier Deployment

Second, Company ownership enables speedier deployment. Conducting a resource acquisition process for third-party-owned resources and developing the associated tariffs and/or contracts to allow for active management and (if allowed) meet market participation requirements would take time and necessitate a complete redevelopment of the program. While this is not an impossibility in the future, these assets can provide value to our customers now, and we should be allowed to deploy and own them to benefit our customers in the immediate term. As we explain below, Sparkfund's model to develop conforming C*C assets specifically aims to speed deployment and leverage economies of scale. This benefit would be lost through a decentralized, dispersed ownership and procurement model.

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C. Company Ownership Protects Safety, Security, and Reliability

Third, safety, security, and reliability are always paramount responsibilities that the Company – not third parties – holds.

In grid emergencies (e.g., faults, outages, or extreme weather), the utility must be able to rapidly and reliably control all assets. Third-party assets may not be as responsive or may have contractual limitations, delaying or complicating emergency actions and increasing risk to grid stability and public and employee safety, whereas the Company manages the system at all hours and can respond immediately to any issues.

Introducing third parties before these lessons are learned would expose the grid to untested risks, as the utility would not have had the opportunity to identify and mitigate safety issues in a controlled environment.

Utility-owned assets can be held to a single, rigorous cybersecurity and physical security standard. Third-party ownership would introduce multiple vendors and systems, each with their own security practices, increasing the risk of cyber vulnerabilities or physical access issues. Xcel Energy's procurement of BESS and inverters or power conversion systems (PCS) involves strict cybersecurity and regulatory requirements because these assets are considered cyber-capable devices. They connect to both information technology (IT) and operational technology (OT) environments and can transmit operational data or enable remote control, which introduces potential vulnerabilities. To mitigate these risks, Xcel Energy mandates formal contracts, vendor risk assessments, and compliance with the North American Electric Reliability Corporation (NERC) Critical Infrastructure Protection (CIP) standards –including CIP-013 (Supply Chain Risk Management), CIP-010 (Configuration Management), and CIP-005/006 (Electronic and Physical Security Perimeters). These standards require secure remote access, patch management, vulnerability assessments, and personnel training to protect critical infrastructure.

Execution challenges arise from evolving policy landscapes, integration of cybersecurity with physical safety standards,³¹ and compliance with Foreign Entity of Concern (FEOC) restrictions for tax credit eligibility. Xcel Energy retains strategic control over all cyber-related procurement, ensuring that system-connected components meet security and compliance requirements. This governance model prioritizes risk reduction and compliance while managing confidentiality and operational constraints. As agencies such as NERC and the U.S. Department of Energy expand monitoring and supply chain safeguards, these requirements improve

³¹ e.g., Underwriters Laboratories (UL) 9540A and National Fire Protection Association (NFPA) 855.

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resilience but do create practical procurement, integration, and confidentiality challenges. Xcel Energy ownership of these cyber-capable assets ensures we meet these obligations and compliance requirements. Company-owned assets can be held to a single, rigorous cybersecurity and physical security standard. Third-party ownership would introduce multiple vendors and systems, each with their own security practices, increasing the risk of cyber vulnerabilities or physical access issues.

Lastly, we note that we complied with the Commission's Order regarding a comparison of other ownership models. The Order requires an "evaluation of a costs and benefits comparison between a utility-owned and managed DCP model and alternative models allowing participation from customer-owned and third-party-owned resources."³² Some parties assert that the Commission's Order requires a quantitative analysis, but the Order language plainly does not, and the Company has complied with the Order. Moreover, attempting to do this type of quantitative analysis would not provide any meaningful information. It does not have quantitative information on "alternative models allowing participation from customer-owned and third-party owned resources." The Company does not have quantitative information on "alternative models allowing participation from customer-owned and third-party owned resources." The Company would need to speculate on these costs and benefits, which would inevitably lead to unresolvable disputes. This would provide no value to the Commission's analysis and review of this proposal. As a result, the Company provided a qualitative analysis that the Commission can consider and is consistent with its Order.

D. Third Parties and Developers Have Ample Opportunities to Participate in Minnesota, and Will Be Able to Participate in Capacity*Connect

Some commenters seem to indicate that third parties do not have sufficient opportunity to participate in Minnesota, seemingly implying that Company ownership of Capacity*Connect assets would somehow preclude participation in existing or future opportunities. This concern is unfounded. Critically, C*C does not displace or constrain any existing incentive programs for third-party ownership models, customer DER participation, or alternative procurement pathways. Xcel Energy currently has over 1.3 GW of distributed solar and storage on its system in Minnesota, nearly all of it owned by third parties. Other programs shown below will continue to drive more third-party distributed energy resource (DER) development. Further, C*C itself will open up approximately \$340 million in opportunities for third-parties to participate through competitive procurement. In this section, we inventory other opportunities

³² 2024 IRP Order at Order Point No. 23.c.

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available to DER developers and explain how portions of C*C's budget will be competitively bid.

1. *Third-Party DER Programs and Incentives*

We are glad to hear that DER developers are so interested in deploying cost-effective distributed solar and storage assets, particularly because on December 19, 2025, we issued an RFP seeking up to 3,500 MW of incremental capacity – including distribution-interconnected resources – to come online before the end of 2030. The RFP also seeks up to 600 MW of solar or solar-plus-storage hybrid resources to meet the Company's DSES obligations. We look forward to seeing developers' bids when they are due on March 18, 2026.³³

Clearly, C*C is not the sole or even primary vehicle through which customers receive DER-related assistance or third parties deploy assets to serve their own customers. Over time, the Company intends C*C to complement these other pathways, enabling an increasingly complete and resilient DER ecosystem while preserving the core obligation to serve all customers reliably and affordably. Table 3 shows the DER opportunities on Xcel Energy's system that are currently available or will soon be available to interested third-party developers and customers.

Table 3
Opportunities and Incentives Available for Third-Party DER on Xcel Energy's Distribution System

Program	Description
Solar*Rewards Community	The Solar*Rewards Community Program was available for applications from third-party developers from 2015 through December 31, 2023. Garden Operators build, own, and operate a community solar garden, sell or lease subscriptions to Xcel Energy's electric customers/subscribers, and Xcel Energy purchases energy, capacity, and Renewable Energy Credits (RECs) from the CSGs. While the program has sunset to new applications, there is approximately 1 GW of CSGs operating on Xcel Energy's distribution system. (Docket No. E002/M-13-867)
Low-Moderate Income (LMI) Community Solar Garden Program	Administered by the Department of Commerce, the LMI CSG Program replaced the legacy CSG program (Solar*Rewards Community) in 2024. The program is open to Xcel Energy customers and offers a monthly solar credit

³³ See the Company's informational compliance filing in Docket No. E002/M-25-429 (December 12, 2025) and <https://mn.my.xcelenergy.com/s/renewable/developers/2025-nsp-rfp>.

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Program	Description
	on their bill based on the energy produced by a CSG developed and owned by a third party. Developers can earn up to \$145/MWh after accounting for the LMI subscriber share. (Docket No. E002/CI-23-335)
Solar*Rewards	Solar*Rewards is a small-scale solar incentive program that has been in operation since 2010. In 2013, Minn. Stat. §116C.7792 was adopted requiring the Company to operate a production-based solar incentive program for solar PV systems no more than 20 kW in size. The Solar*Rewards program provides production incentives for customer-sited solar energy generating units. Program participants receive an incentive based on the system’s energy production as well as up-front incentives. (Docket No. E002/M-13-1015)
Battery Storage Incentive Program	This program is designed to reduce the cost to purchase and install a new 50 kWh or smaller on-site energy storage system through an incentive of up to \$5,000. The BESS must be paired with an on-site solar energy generating system. (Docket No. E002/M-23-459)
Battery Connect	This forthcoming program will allow residential and small commercial customers to earn incentives by granting the Company access to their on-site BESS for demand management applications. Approved BESS systems up to 50 kWh in storage capacity will be eligible for participation in the program. The Company will maintain and update a list of approved battery manufacturers. By participating in this program, BESS will be operated to charge off peak and discharge during peak hours. We anticipate launching Battery Connect in Q1 2026. (Docket No. E,G002/CIP-23-92)
Cost Sharing Fund	The Cost Sharing Fund has been in effect since January 3, 2023. The Fund is intended to help eligible customers move their projects forward by funding interconnection upgrades up to \$15,000. (Docket No. E002/M-18-714)
Distributed Solar Energy Standard (DSES)	Minn. Stat. 216B.1691, subd. 2h requires that three percent of the Company’s retail sales be generated by qualifying distributed solar by the end of 2030. We anticipate we will need at least 600 MW from new distributed solar projects to meet our DSES obligations, and our Near-Term RFP seeks up to 600 MW of qualifying projects to meet this need. (Docket Nos. E002,E015,E017/CI-23-403 and E002/M-25-441)
Near-Term NSP RFP	Launched December 19, 2025, this RFP seeks 3,500 MW of capacity, including distribution-interconnected projects in Xcel Energy’s five-state Upper Midwest footprint. The RFP also seeks up to 600 MW to meet our DSES obligation as

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Program	Description
	discussed above. (Docket No. E002/M-25-429)
NWA RFP	As discussed in our 2025 Integrated Distribution Plan (IDP), we propose to issue an RFP no later than June 1, 2026 to gauge market interest in developing two NWA projects. (Docket No. E002/M-25-142)
Distributed Generation Interconnection	Third parties seeking to interconnect to the Xcel Energy distribution system can go through the MN DIP process to access our system. (Docket No. E999/CI-16-521)
Proactive Distribution Grid Upgrades Framework	The PDGU framework streamlines the review and approval of investments that are necessary to prepare the distribution grid for increased customer loads and DER growth. The Commission established a Framework and phase 2 of the PDGU process is underway. (Docket No. E002/CI-24-318)
Distribution System Reactive Upgrade Process (DSRUP)	Minnesota Session Laws – 2024, Regular Session, Chapter 126, Article 6, Section 53 requires the Commission to establish generic standards “for the sharing of utility costs necessary to upgrade a utility’s distribution system by increasing hosting capacity or applying other necessary distribution system upgrades at a congested or constrained location in order to allow for the interconnection of distributed generation facilities.” The Commission hearing on the generic Standards is slated for early 2026. (Docket No. E002,E015,E017/CI-24-288)

As shown in the table above, Xcel Energy – in collaboration with the Commission and stakeholders – has many programs and incentives in place or in development to provide third-party developers and customer with extensive opportunities to access our distribution system and be compensated for the value their assets can bring to the system. The 50-200 MW we propose to own for Capacity*Connect Phase 2 represents a small portion of the potential opportunities currently available and assets already online on our distribution system and requiring third-party ownership of some or all of the proposed C*C assets is not in the best interest of customers.

*2. Competitive Procurement for Capacity*Connect*

Approximately 80 percent, or roughly \$340 million, of the total program budget is planned to be competitively bid, including engineering, procurement, construction, equipment supply, and ongoing service and maintenance.

Several stakeholders have suggested that C*C should be structured to allow broader third-party participation in the procurement process. While we do anticipate competitive bidding for certain aspects of Capacity*Connect work as discussed above,

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operational safety and security are paramount considerations for any distribution grid asset, including C*C BESS. Equally important is the prudent stewardship of customer funds through economies of scale. Together, these considerations necessitate centralized equipment procurement and program oversight under the Company's control, in much the same way as all distribution system infrastructure operated solely for system benefit (transformers, capacitor banks, etc.). The program is designed to enable standardized, conforming BESS deployments that comply with the Company's engineering, safety, and cybersecurity requirements. Original equipment manufacturers under consideration for utilization in C*C have undergone or will undergo a competitive solicitation process to ensure these standards are met. Separating this aspect of the program management to open procurement by alternative third party developers or distributors would only increase the administrative complexity, logistical complexity, and project costs. For these reasons, central procurement is not an exclusionary design choice, it is a necessary feature of deploying utility-grade infrastructure safely, securely, and cost-effectively at scale. That said, we are still in the process of developing a procurement framework in collaboration with Sparkfund.

III. WE ARE COMMITTED TO ADVANCING EQUITY THROUGH CAPACITY*CONNECT

The Company recognizes that C*C is not a static program and should not be treated as one. The Company and its implementation partner, Sparkfund, have intentionally designed C*C to be adaptive, built to launch quickly, learn in real time, and incorporate feedback and improvements as deployment progresses. We are not only open to changes over time, we expect and welcome them, particularly as we gain experience working directly with customers and communities, and as stakeholders propose practical solutions and recommendations that can strengthen outcomes.

This overall approach also applies to the Company's efforts to incorporate equity into the design and implementation of C*C. While we argue in this section that many of the prescriptive requirements and quantitative targets proposed by some parties are premature at this time, this does not lessen the Company's commitment to equity. It merely indicates that the Company is trying to be adaptive and learn from stakeholders – including, in particular, community organizations and eventual site hosts themselves. Consistent with that approach, we view early implementation as an essential step toward refining and expanding equity-driven elements, and we are eager to incorporate near-term adjustments as detailed below regarding program tracking and reporting.

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In that spirit, we appreciate parties’ specific feedback and suggestions regarding how Capacity*Connect could be used to advance equity objectives in Minnesota. Equity has been and will remain an important theme of the Company’s stakeholder engagement on C*C. In fact, a substantial portion of the C*C stakeholder workshop focused specifically on equity considerations and how C*C can and should evolve over time. However, many of the prescriptive requirements, quantitative targets, and process/reporting recommendations that parties have suggested feel to us premature and in some cases overly burdensome, considering the initially small scale of Capacity*Connect and our objective of moving quickly to learn and adjust as C*C scales. The Company needs to launch Capacity*Connect, with equity objectives embedded from the outset, without additional compliance requirements that, at this juncture, will primarily slow implementation of Phase 2 and delay benefits to customers and communities. It is only by getting the siting and site host identification process underway that we can begin to learn directly from communities and potential site hosts what their equity priorities are. In this section, we reiterate our commitment to equity overall and agree to certain recommendations proposed by parties, but emphasize the value of flexibility, learning, and intentional development over time.

For Capacity*Connect, we see – and parties commented on – two primary streams of value in terms of equity: siting (including the siting process itself) and contracting. We address each item below. In doing so, we note that some parties advocating for third-party ownership models do not acknowledge the inherent equity challenges those models have often faced. Unlike the Company, third-party owners of DERs operate outside the Commission’s oversight, which can reduce transparency, fragment accountability, and limit the Company’s and Commission’s ability to ensure that benefits flow to EJ communities and qualified customers. In contrast, C*C is designed to keep equity accountability clear and direct and to ensure the Company can directly engage customers, provide site-host payments, and connect communities to additional programs and services.

A. Site Host Lease Payments Provide Direct, Meaningful Economic Benefit to Participating Customers

As discussed in our Petition, after identifying target feeders and potential eligible sites to host the BESS, we plan to reach out to community organizations, certified businesses, and customers in EJ areas first. We believe this “first offer” approach is a meaningful way to ensure that community organizations, certified businesses,³⁴ and customers in EJ areas have first access the benefit of site host payments, if they

³⁴ “Certified businesses” that meet either state or federal requirements.

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choose to participate. To be clear, participation as a site host will always be voluntary. No customer or community organization will be forced to host a BESS. While some parties suggest that site host payments are not beneficial, this directly contravenes the Company’s experience in the Resilient Minneapolis Project (RMP), where site host payments have been important to the hosts and have been used to fund programs supporting their communities, expand energy workforce education, support new staff positions, and meet other ongoing needs. So we do not believe that is a fair assessment to make before we have spoken to many customers and communities about Capacity*Connect. We view these payments as a durable revenue stream that can support community-serving priorities over the full life of the asset. Indeed, the payments could total **[PROTECTED DATA BEGINS** **PROTECTED DATA ENDS]**. C*C payments could offset other expenses and strengthen organizational or business capacity to serve their communities or increase profitability.

B. The Site Acquisition Process is Itself a Concrete Lever to Engage with Customers and Understand Their Needs and Opportunities to Support Them

While site host payments are likely important to hosts, the Company’s ability to support site hosts does not begin and end with payments. Rather, the process of engaging with potential site hosts can be, in our experience, an opportunity to better understand their equity objectives and community needs and connect them with Company programs serving a broad array of community needs.

The “first offer” approach to sites in EJ areas, certified businesses, and community organizations will provide another avenue to engage with those customers directly and build relationships to help meet their needs. For example, through the process of developing the RMP, we found that the host sites had other pressing energy-related needs – making their building more energy efficient, installing new heating systems, connecting their clients with energy affordability assistance, building up new programs for energy workforce training, and more – that were not addressed by RMP directly, but which the Company has supported through other programs. Addressing those needs – which the Company only learned about by initiating site host conversations similar to what is proposed in C*C – has now become a core part of our ongoing partnerships with the RMP site hosts.

Similarly for C*C, whether a customer ultimately decides to host a BESS, these siting conversations will create immediate and durable equity value by connecting EJ-area

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and community serving organizations to the Company's various programs, resources, and solutions that can address broader energy priorities. We are eager to leverage C*C touchpoints as an avenue to help build lasting relationships that can help meet the needs of customers in EJ areas, certified businesses, or community organizations. A customer may be interested in hosting a C*C battery and also finding ways to lower their electricity bill through energy efficiency or rebates. They may be interested in training opportunities for their communities or hosting an educational program at the BESS site. By starting simple, we will be able to more deliberately and directly work with customers and communities to understand and meet their needs, which can help inform not just refinements to C*C as we scale over time, but also new and existing programs and ways to support our customers and communities. Only Xcel Energy can provide this direct, program-connected engagement at scale, linking site hosts and eligible customers to additional offerings that advance energy priorities via Capacity*Connect.

C. Robust Reporting is Preferable to Prescriptive Targets in a Learn-By-Doing Approach

We agree with the Department of Commerce that disadvantaged communities have historically borne a disproportionate share of the state's industrial and energy infrastructure, and siting infrastructure within an EJ area is not necessarily inherently beneficial.³⁵ That is precisely why the C*C siting approach is opt-in, customer-driven, and grounded in direct engagement. For this reason – and because we have not yet selected the specific feeders on which we will target C*C BESS deployment – firm targets or goals for the number of sites or amount of host payments directed to EJ areas or qualified customers would be premature at this stage.

Reporting of C*C assets sited in EJ areas and otherwise benefiting disadvantaged communities is however entirely appropriate. The Department suggested that the Company track and report specific, quantifiable equity metrics in program reports. In our quarterly reports and Interim Program Assessment discussed above, we will report on the following qualitative and quantitative metrics related to site hosting, which will provide transparent, trackable accountability for equity outcomes as the program scales:

- Number of eligible sites in EJ areas, at certified businesses, and at community organizations.

³⁵ Department Comments at 17.

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- Description of outreach to and feedback received from eligible sites.
- Number of site hosts located in EJ areas, certified businesses, or community organizations.
 - Description of host engagement, including how we have consulted with them on safety and aesthetics.³⁶
- Host payments paid to customers in EJ areas, certified businesses, or community organizations.

Robust reporting, rather than up-front prescriptive targets, is consistent with the learn-by-doing, adaptive approach to C*C described above. The Company cannot know, until we begin talking with community organizations and potential site hosts, how many of them see net benefit in hosting a C*C BESS.

Tracking and reporting on these items will enable lessons learned regarding customers' reactions to site hosting opportunities; the success and accessibility of our outreach and communications to possible site hosts; and other feedback we receive that can help inform and expand equity-focused benefits in future phases. We can provide this information publicly, but a public dashboard with maps as suggested by Fresh Energy is overly burdensome. In addition, showing the precise location of assets on the distribution system could compromise security or customer data privacy.³⁷

D. Responsible Sourcing is a Core Company Practice That Will Continue with Capacity*Connect

Xcel Energy prioritizes supplier sustainability and participation across a broad vendor portfolio. We continually seek partners who reflect our communities, are invested in our success, and can grow with us. By partnering with certified small businesses and local suppliers, we drive economic growth, advance sustainability, and elevate ethical supplier partnerships. This ensures our supplier base remains competitive and strengthens our supply chain to support the communities we serve.

Through its Supplier Development program, the Company strengthens its supply chain by developing small disadvantaged and local suppliers and aligning efforts with corporate, state and federal requirements. To ensure we meet our commitment, the Company requires all sourcing events to include at least one certified supplier, seek opportunities to expand our footprint through industry collaboration, and engage

³⁶ As recommended by the Department (Comments at p. 17).

³⁷ See Docket No. E999/CI-20-800, which is ongoing.

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suppliers in responsible business practices. These efforts have increased supplier participation in sourcing events, expanded Tier II³⁸ reporting with prime suppliers, and supported measurable progress in community and sustainability outcomes. In 2024, the company achieved over \$651 million in small/diverse business spend and over \$4.2 billion in local spend across Xcel Energy.

This Company-wide commitment to inclusive procurement practices will continue with Capacity*Connect.

Fresh Energy further recommended establishing a diverse-supplier set-aside.³⁹ As always, affordability is a cornerstone of our responsibility to provide electric service to all customers, and therefore bid prices and costs must be similarly prioritized in the procurement process. While we cannot commit to a specific goal or target for sourcing from certified businesses, we are working with Sparkfund to refine procurement plans and will ensure that certified businesses have the opportunity to participate, and we intend to prioritize and incentivize certified businesses in the C*C procurement process (e.g., through higher scoring and/or bonus points for certified businesses and subcontracting with certified businesses, etc.).

We also do not support establishing a training fund at this time, as recommended by Fresh Energy.⁴⁰ While we support job training and have existing programs and partnerships in place, and we believe that additional funding for those programs should be evaluated in a broader context outside the narrow confines of this Capacity*Connect proposal.

E. Stakeholder Consultation Mechanisms

Fresh Energy proposes the Company should establish a new equity advisory group, meeting quarterly and specifically focused on C*C.⁴¹ We believe this may be overly burdensome and would duplicate an existing engagement structure and delay near-term deployment. The Company has an established Environmental Justice Advisory Board (EJAB), convened under Commission Order in our integrated resource planning process. We will make our first presentation on C*C to the EJAB on January 13, seeking its feedback on equity and environmental justice considerations in the design and implementation of C*C, and will discuss that feedback in Supplemental

³⁸ Tier II suppliers are vendors that contract with the Company's prime suppliers; i.e., the Company does not have a direct contractual relationship with Tier II suppliers.

³⁹ Fresh Energy Comments at pp. 6-7.

⁴⁰ Fresh Energy Comments at p. 7.

⁴¹ Fresh Energy Comments at pp. 3-4.

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Comments. We commit to engaging with EJAB on Capacity*Connect regularly and meaningfully, as much as the group or its members would like.

Rather than creating a separate advisory group for this program, we believe that talking directly to customers and communities will be the most valuable and informative form of engagement in the near term.

IV. STANDALONE STORAGE SUPPORTS MINNESOTA’S CLEAN ENERGY GOALS AND IS ELIGIBLE FOR RES RIDER RECOVERY

Parties who addressed our proposal to recover costs through the Renewable Energy Standard (RES) Rider largely opposed our position that these standalone storage assets qualify for RES Rider recovery under Minnesota law.⁴² Parties’ general assertion that standalone storage does not qualify for RES Rider recovery is incorrect.

In this section, we discuss how standalone storage supports Minnesota’s renewable and carbon-free energy standards and thus is eligible for recovery under the RES Rider; and we provide information on how this C*C Phase 2 learning phase is also eligible for RES Rider recovery because it fits the statutory definition of an energy storage system pilot project under Minn. Stat. § 216B.16, subd. 7e. Attachment B provides a compliance matrix for the requirements of Minn. Stat. § 216B.16, subd. 7e.

A. Standalone Storage is Eligible for RES Rider Recovery

Parties’ position that standalone storage like Capacity*Connect does not qualify for recovery rider recovery under Minn. Stat. § 216B.1645, subd. 2a, is incorrect and counterproductive. Standalone storage projects – whether small-scale like Capacity*Connect or grid-scale like our planned Blue Lake and Sherco BESS – support Minnesota’s energy policies.

Minn. Stat. § 216B.1645, subd. 2a, provides for cost recovery of investments and expenditures made to “provide storage facilities for renewable energy generation facilities that contribute to the reliability, efficiency, or cost-effectiveness of the renewable facilities.” As system assets, regardless of size, energy storage enhances the reliability, efficiency, and cost-effectiveness of renewable facilities and supports Minnesota’s renewable energy objectives. The large-scale standalone storage we are in the process of deploying is designed to replace retiring capacity at fossil-fuel-powered plants such as Blue Lake Generating Station and the Sherco coal units. These assets will be deployed as a system asset capable of storing excess electricity – including

⁴² Minn. Stat. § 216B.1645, subd. 2a.

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renewable generation – during periods of low demand and discharging when demand increases. This function supports the integration and efficient use of renewable energy across the grid, even if it is not physically located next to or interconnected with a single renewable facility. Without standalone storage on our system to provide important attributes to balance the grid and integrate renewables, we would likely need to rely on fossil-fueled generation to provide those attributes, imperiling our ability to meet Minnesota’s renewable and carbon-free standards. In this way, standalone storage directly supports our compliance with Minnesota’s standards.

The statutory language also contemplates additional bases for recovery that standalone storage can meet. Specifically, the Company can recover expenses that are directly related to a renewable energy project that the Company can demonstrate will “advance research and understanding of how storage devices may improve renewable energy projects.”⁴³ The Company’s standalone storage projects are directly related to the Company’s continuing efforts to improve renewable energy project integration and will enhance the Company’s understanding of how storage can contribute to grid reliability, frequency regulation, and resiliency with a portfolio that includes more intermittent resources. These learnings are vital for maximizing the benefits of renewable energy resources and affordably achieving greater penetration of these resources. By enabling a higher and more efficient utilization of renewables, reducing energy waste, and supporting grid recovery during emergencies, BESS projects play a vital role in achieving the state’s clean energy goals. Moreover, the deployment of BESS assets advances the system-wide integration of renewables, facilitates compliance with Minn. Stat. § 216B.1641, and provides valuable operational data and experience that will inform future renewable and storage investments. These benefits are not limited by the physical proximity of the storage facility to a renewable generator but are realized across the entire system.

As such, the statutory criteria for cost recovery under the RES rider apply to standalone BESS systems, regardless of their specific location relative to renewable generation. The language and intent of Minn. Stat. § 216B.1645 support recovery for storage projects that contribute to the reliability, efficiency, and cost-effectiveness of renewable resources, whether through direct connection or broader grid support.

⁴³ Minn. Stat. § 216B.1645, subd. 2a(3).

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B. Capacity*Connect Phase 2 is a Learning Phase and is Also Eligible Under Minn. Stat. § 216B.16, Subd. 7e

Although standalone storage supports Minnesota’s carbon-free standards and is eligible for RES Rider recovery, C*C Phase 2 is a learning phase and fits the definition of a pilot under Minn. Stat. § 216B.16, subd. 7e, which allows a utility to petition the Commission to recover costs associated with energy storage system pilot projects approved by the Commission. This legislation was adopted in 2019 and is specifically intended to spur greater investments in energy storage in Minnesota.

The statute defines “pilot project” as one that is (i) owned, operated, and controlled by a public utility to optimize safe and reliable system operations, and (ii) deployed at a limited number of locations in order to assess the technical and economic effectiveness of its operations. The learning phase we have proposed fits this definition. The storage assets will be owned, operated, and controlled by Xcel Energy with the aim of optimizing operations safely and reliably while maximizing benefits to customers. The assets would be deployed at a smaller number of locations (no more than 200) to test the technical and economic effectiveness and the scalability of Capacity*Connect.

As part of a petition under Minn. Stat. § 216B.16, subd. 7e, the public utility must submit the following information regarding the proposed energy storage system pilot project: storage technology used; energy storage capacity and duration of output at that capacity; proposed location; purchase and installation costs; how the project will interact with existing distributed resources on our grid; and the goals that the project proposes to achieve. We have addressed these items in our Petition and these Reply Comments. Attachment B provides a compliance matrix for the requirements of Minn. Stat. § 216B.16, subd. 7e, as requested by the Department.

We appreciate the Department’s support for a streamlined approach to RES Rider recovery of the learning phase in Phase 2, consistent with the approach taken in Docket No. E002/M-23-119 for the Form Energy long-duration energy storage pilot project. As the Department explained:

For regulatory-review purposes, Xcel shall include prudent C*C and Grid DERMS costs in its annual RES Rider petitions and add these costs into the RES Adjustment Factor, creating a successor Adjustment Factor that operates identically to the current one except that it also includes approved C*C costs. At the same time, Xcel shall establish a new rate schedule pursuant to Minn. Stat. § 216B.16, subd. 7e. This approach would satisfy the statutory

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requirement for a separate schedule while imposing no additional regulatory filings and no additional line items on customer bills.⁴⁴

The Department requested that we provide the required tariff language and successor Adjustment Factor proposal in Reply Comments. The RES Rider tariff language was updated in Docket No. E002/M-23-119 to reference approved energy storage pilot projects; we discussed the tariff – Minnesota Electric Rate Book—MPUC No. 2, Section 5, Sheet No. 147, Revision 20⁴⁵ – with the Department and understand that no further tariff modifications would be necessary at this time.

CONCLUSION

Capacity*Connect Phase 2 represents an innovative approach to distributed capacity procurement that prioritizes customer benefits, operational safety, and equity while advancing Minnesota’s clean energy goals. By starting with a streamlined, scalable learning phase and remaining open to stakeholder feedback and evolution along the way, the Company aims to deliver system-wide value through strategic deployment of battery energy storage systems, rigorous reporting, and adaptive learning. The proposal incorporates competitive procurement, responsible sourcing, and robust engagement with communities – especially those in environmental justice areas – ensuring transparency and accountability throughout implementation. As the program evolves, the Company is committed to refining its analysis of distribution system benefits and safeguarding reliability and affordability for customers. Approval of Capacity*Connect Phase 2 will position Minnesota to lead in distributed energy innovation, balancing progress with prudent oversight and a strong commitment to equitable outcomes.

We respectfully request the Commission approve:

- Implementation of Capacity*Connect Phase 2 as a learning phase, including:
 - Deployment of approximately 50-200 MW of Company-owned and -operated distribution-interconnected BESS by the end of 2028.
 - A budget range of approximately \$152 million (corresponding to the planned 50 MW deployment) to approximately \$430 million (estimated for a 200 MW deployment) through 2028.
 - Quarterly status reporting, as shown in Attachment A, to begin no later than three months after the Commission’s Order.

⁴⁴ Department Comments at p. 26.

⁴⁵ Available at

https://xcelnew.my.salesforce.com/sfc/p/#1U0000011ttV/a/R3000009e3DN/aTr4AtBhOStSP5symY_0MDt4hVbAzzoN3crNQ3NWMK0.

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- An Interim Program Assessment, including measurement and verification (M&V) from a third-party consultant, to be filed after commercial operation of 20 MW or two years from Phase 2 approval, whichever is sooner.
- A Capacity*Connect Evaluation Plan to be filed within 180 days of the Commission's Order.
- Implementation of a limited deployment of a grid distributed energy resources management system (DERMS).
- The Company's proposal to seek recovery of C*C costs in the Renewable Energy Standard (RES) Rider.

In addition, we commit to utilizing initial data from C*C Phase 2 to inform development of an estimated NSPM-specific distribution benefit value by with our 2027 IDP filing, due by November 1, 2027. In our 2027 IDP, we will explain our analysis and how it may guide future C*C siting. The compliance filing will include a plan for ongoing updates and refinements to the analysis.

Dated: January 9, 2026

Northern States Power Company

CAPACITY*CONNECT QUARTERLY REPORT CONTENTS

Table A-1: Quarterly Program Status Report Contents – Capacity*Connect Phase 2

Topic	Contents/Metrics
Deployment and Budget	Procurement update (narrative)
Deployment and Budget	# of sites operational
Deployment and Budget	MW operational
Deployment and Budget	# of sites under construction
Deployment and Budget	MW under construction
Deployment and Budget	Capital spend compared to plan <i>Estimated – actuals with detail included in cost recovery filings</i>
Deployment and Budget	O&M spend compared to plan <i>Estimated – actuals with detail included in cost recovery filings</i>
Deployment and Budget	\$/MW installed
BESS Performance and Benefits	Actual MISO market revenue from energy <i>Prior to deployment/ market participation, reports will include a narrative update on MISO market registration</i>
BESS Performance and Benefits	Actual MISO market revenue from capacity
BESS Performance and Benefits	Number of MISO resource adequacy hours
BESS Performance and Benefits	Number of MISO resource adequacy hours missed
Grid DERMS	Number of dispatch events leading to distribution operational limits.
Grid DERMS	Number and severity of loading and voltage violation at the constrained locations
Grid DERMS	Number of fail-safe actions and return to normal
Studies	Discussion of study results and any distribution upgrades needed
Equity & Environmental Justice	Number of eligible sites in EJ areas; certified businesses; and community organizations
Equity & Environmental Justice	Description of outreach conducted and feedback received from eligible sites
Equity & Environmental Justice	Number of site hosts located in EJ areas; certified businesses; or community organizations
Equity & Environmental Justice	Description of host engagement, including how we have consulted with them on safety and aesthetics
Equity & Environmental Justice	Host payments paid to customers in EJ areas; certified businesses; or community organizations

Topic	Contents/Metrics
Equity & Environmental Justice	Description of additional engagement Xcel Energy has had with site hosts or eligible sites to address their energy priorities
Equity & Environmental Justice	Subcontracts (# and \$) awarded to certified businesses
Labor Standards	Wage and apprenticeship data for ITC-eligible work (auditable data as required for ITC compliance)
Labor Standards	Labor standards update/discussion (narrative)
Additional Research Questions / Learning Objectives	Discussion of any lessons learned or observations regarding hosting capacity as applicable

COMPLIANCE MATRIX

Table B-1: Energy Storage Statute Filing Requirements – Capacity*Connect Phase 2

Filing Requirement	Overview of Response	Record Location ¹
<i>Minn. Stat. § 216B.16, subd. 7e, paragraph (a), clauses (1) to (6)</i>		
(1) the storage technology utilized;	Front-of-the-meter (FTM) battery energy storage systems (BESS), lithium-ion technology	Petition pp. 2, 43
(2) the energy storage capacity and the duration of output at that capacity;	1-3 MW BESS per site/4-12 MWh (4-hour duration) – totaling 50-200 MW for Phase 2	Petition pp. 2, 9
(3) the proposed location;	Commercial customer locations across Xcel Energy’s Minnesota service area; specific locations selected through additional analysis.	Petition pp. 16-19
(4) the purchase and installation costs;	Approximately \$152 million to \$430 million through 2028.	Petition pp. 3, 29-32; Petition Attachment B
(5) how the project will interact with existing distributed generation resources on the utility's grid; and	Xcel Energy will utilize a limited Grid DERMS deployment to monitor and/or dispatch the BESS for bulk system use cases (e.g., MISO energy and capacity market participation). Interaction with and impact to existing distributed generation will be studied as part of system impact studies.	Petition pp. 26-28; Reply Comments pp. 23-24
(6) the goals the project proposes to achieve, which may include controlling frequency or voltage, mitigating transmission congestion, providing emergency power supplies during outages, reducing curtailment of existing renewable energy generators, and reducing peak power costs.	Goals include benefiting all customers through bulk system value and also realizing distribution and other benefits through strategic siting as operational capabilities expand to evolve toward more dynamic operations. Themes of our learning objectives include: operational coordination; local considerations and customer interest and impacts to siting; identifying and quantifying any benefit tradeoffs; quantifying actual realized revenues and benefits; impacts to hosting capacity; process and study evolutions necessary to enable multiple objectives; DERMS functionalities; other benefits such as speed to power; and equity and environmental justice.	Petition; Reply Comments pp. 29-30
<i>Minn. Stat. § 216B.1645, subd. 2a, paragraph (b), clauses (1) to (4)²</i>		
(1) A description of the facilities for which costs are to be recovered	BESS equipment; BESS operations & maintenance; limited Grid DERMS; program management; site host payments	Petition pp. 29-32
(2) An implementation schedule for the facilities	2026-2028	Petition pp. 14-15

¹ Petition refers to the Company’s October 3, 2025 Petition; Reply Comments refers to the Company’s Replies filed January 9, 2026.

² Minn. Stat. § 216B.16, subd. 7e paragraph (b) states, in part: “A petition filed under this subdivision must include the elements listed in section 216B.1645, subdivision 2a, paragraph (b), clauses (1) to (4), and must describe the benefits of the pilot project.”

(3) The utility's costs for the facilities	Approximately \$152 million to \$430 million through 2028.	Petition pp. 3, 29-32; Petition Attachment B
(4) A description of the utility's efforts to ensure that costs of the facilities are reasonable and were prudently incurred	Competitive procurement; economies of scale; standardization of BESS deployments; measurement & verification; ongoing reporting; Interim Program Assessment.	Reply Comments

COMMENT CONCEPTS AND ALTERNATE VENUES

We appreciate parties' engagement and ideas for Capacity*Connect. These ideas, suggestions, and concepts are not directly related to our Capacity*Connect proposal, but the Commission may wish to consider – or is already considering – these topics in other proceedings. In the table below, we briefly describe common concepts and recommendations raised by commenters, and an alternative venue(s) in which the Commission is considering or could consider each topic.

Party Recommendation Concept	Notes and Alternative Venue(s)
Battery energy storage systems (BESS) used for distributed energy resources/distributed generation (DER/DG) enablement	<ul style="list-style-type: none"> • A Distributed Generation Working Group (DGWG) subgroup has been working to develop study processes and standards for using BESS to enable limited and non-export interconnections; the subgroup is coming to close and will be providing a final report to the DGWG with recommended changes to the Minnesota DER Interconnection Process (MN DIP), which will be considered by the Commission after an upcoming Notice of Comment Period. <ul style="list-style-type: none"> ○ Docket No. E999/CI-16-521
BESS used to defer a distribution system capacity upgrade	<ul style="list-style-type: none"> • The non-wires alternatives (NWA) analysis in the IDP analyzes whether DER including BESS can benefit the distribution system to defer the need for a planned capacity project. The pending Integrated Distribution Plan (IDP) highlights the Company's plan to pursue a Request for Proposals (RFP) for two of the NWA projects studied by the Company. The Company plans to issue the RFP no later than June 1, 2026, with RFP responses due July 31, 2026. <ul style="list-style-type: none"> ○ Docket No. E002/M-25-142
Increasing hosting capacity; upgrade costs	<ul style="list-style-type: none"> • The Proactive Distribution Grid Upgrades Framework (PDGU) streamlines the review and approval of investments that are necessary to prepare the distribution grid for increased customer loads and DER growth. The Commission established an initial Framework and phase 2 development of the PDGU Framework is underway. <ul style="list-style-type: none"> ○ Docket No. E002/CI-24-318 • The Distribution System Reactive Upgrade Process (DSRUP) will establish standards for the sharing of utility costs necessary to upgrade a utility's distribution system by increasing hosting capacity to allow for distributed generation interconnection. The Commission hearing on the generic Standards is slated for early 2026. <ul style="list-style-type: none"> ○ Docket No. E002,E015,E017/CI-24-288

Party Recommendation Concept	Notes and Alternative Venue(s)
Use of flexible interconnection	<ul style="list-style-type: none"> • A DGWG subgroup is beginning in early 2026 to develop study processes and standards for flexible interconnection in the context of the MN DIP. <ul style="list-style-type: none"> ○ Docket No. E999/CI-16-521 • In the context of DERMS use cases, in the Notice of Comment Period in the instant docket, Commission Staff noted that comments on the DERMS roadmap and broader DERMS implementation should be included in the IDP docket. <ul style="list-style-type: none"> ○ Docket No. E002/M-25-142
BESS used for feeder or customer reliability or resilience	<ul style="list-style-type: none"> • The 2025 IDP discusses reliability results and programs. The NWA analysis analyzes whether DER, including BESS, can avoid outages due to capacity constraints. • The IDP also discusses our targeted undergrounding plan as a long-term reliability improvement initiative. The IDP provides a holistic, long-term view of distribution programs including reliability, and the Commission can weigh in on whether further reliability investments or approaches should be incorporated or evaluated in the planning process. <ul style="list-style-type: none"> ○ Docket No. E002/M-25-142 • The Annual Safety, Reliability, and Service Quality Report includes reliability metrics and reporting and provides an opportunity for the Commission and stakeholders to comprehensively evaluate reliability performance and actions to determine if additional efforts are necessary. Currently, the Company is reviewing the causes and mitigations for disparities in long outages as an outcome of this process. <ul style="list-style-type: none"> ○ Docket No. E002/M-25-27 • The Quality of Service Plan includes reliability standards and reporting with financial consequences for missing performance thresholds. <ul style="list-style-type: none"> ○ Docket Nos. E,G002/CI-02-2034 and E,G002/M-12-383 • The forthcoming Battery Connect program will allow residential and small commercial customers to earn incentives by granting the Company access to their on-site BESS for demand management applications. This can incentivize customers to adopt residential BESS to provide their own resilience benefits while participating in demand management programs. The Commission can review the results of this program through tariff and cost recovery processes. <ul style="list-style-type: none"> ○ Docket No. E,G002/CIP-23-92

Party Recommendation Concept	Notes and Alternative Venue(s)
	<ul style="list-style-type: none"> • The Battery Storage Incentive Program is designed to reduce the cost to purchase and install energy storage paired with existing on-site solar through an incentive of up to \$5,000. The BESS must be paired with an on-site solar energy generating system. The Department has oversight over this program; the Commission and stakeholders can review this program through the Company's annual reports and other filings. <ul style="list-style-type: none"> ○ Docket No. E002/M-23-459
Third-party access to the distribution system	<ul style="list-style-type: none"> • The MN DIP governs third-party distribution system access and interconnection. <ul style="list-style-type: none"> ○ Docket No. E999/CI-16-521 • There are at least 12 programs, initiatives, and incentives available to enable and support third-party DER deployment, and the Company has 1.3 GW of DER and another 1 GW in queue that is third-party owned. (See Table 3 of these Reply Comments) • Minnesota's Distributed Solar Energy Standard (DSES) requires the Company to add approximately 600 MW of competitively bid distributed solar to its distribution system by the end of 2030. Our first request for proposals (RFP) has concluded without any viable bids, and the Commission could choose to take action on our December 30, 2025 Letter in Docket No. E002/M-25-441. <ul style="list-style-type: none"> ○ Docket Nos. E002,E015,E017/CI-23-403 and E002/M-25-441 • We issued another RFP for DSES compliant-resources and other distribution-connected system resources on December 19, 2025. <ul style="list-style-type: none"> ○ Docket No. E002/M-25-429
DER Management System (DERMS) use cases; third-party or open access to DERMS	<ul style="list-style-type: none"> • The 2025 IDP includes the Company's DERMS roadmap and discussion of flexible interconnection. As noted above, Commission Staff requested that comments on the DERMS roadmap and broader DERMS implementation should be included in the IDP docket. <ul style="list-style-type: none"> ○ Docket No. E002/M-25-142
Creation of a program for behind-the-meter aggregation of customer devices	<ul style="list-style-type: none"> • The established venue for demand response programs (virtual power plants) is the Energy Conservation and Optimization (ECO) portfolio. The Company's next Triennial plan is due June 1, 2026. The Commission has oversight of cost recovery and tariffs associated with the Company's ECO programs.

CERTIFICATE OF SERVICE

I, Victor Barreiro, hereby certify that I have this day served copies of the foregoing document on the attached list of persons.

xx by depositing a true and correct copy thereof, properly enveloped with postage paid in the United States mail at Minneapolis, Minnesota

xx electronic filing

DOCKET NOS. E002/M-25-378
E002/RP-24-67
E002/CN-23-212

Dated this 9th day of January 2026

/s/

Victor Barreiro
Regulatory Administrator

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
1	Steve	Albrecht	steve.albrecht@shakopeedakota.org	Shakopee Mdwakanton Sioux Community		Shakopee Mdwakanton Sioux Community 2330 Sioux Trail NW Prior Lake MN, 55372 United States	Electronic Service		No	M-25-378
2	Jared	Alholinna	jaholinna@grenergy.com	Great River Energy		12300 Elm Creek Boulevard Maple Grove MN, 55369 United States	Electronic Service		No	M-25-378
3	Michael	Alpogianis	malpogianis@invenergy.com	Invenergy		1 South Wacker Drive Chicago IL, 60606 United States	Electronic Service		No	M-25-378
4	Gary	Ambach	gambach@slipstreaminc.org	Slipstream, Inc.		8973 SW Village Loop Chanhausen MN, 55317 United States	Electronic Service		No	M-25-378
5	Dennis	Anderson	whatelse@q.com			5295 Anderlie Lane White Bear Lake MN, 55110 United States	Electronic Service		No	M-25-378
6	Keith	Anderson	keith.anderson@shakopeedakota.org	Shakopee Mdwakanton Sioux Community		Shakopee Mdwakanton Sioux Community 2330 Sioux Trail NW Prior Lake MN, 55372 United States	Electronic Service		No	M-25-378
7	Shannon	Anderson	sanderson@solarunitedneighbors.org	Solar United Neighbors			Electronic Service		No	M-25-378
8	Beren	Argetsinger	bargetsinger@keyesfox.com			PO BOX 166 Burdett NY, 14818 United States	Electronic Service		No	M-25-378
9	Katherine	Arnold	katherine.arnold@ag.state.mn.us		Office of the Attorney General - Department of Commerce	445 Minnesota Street Suite 1400 St. Paul MN, 55101 United States	Electronic Service		No	M-25-378
10	Susan	Arntz	sarntz@mankatomn.gov	City Of Mankato		P.O. Box 3368 Mankato MN, 56002-3368 United States	Electronic Service		No	M-25-378
11	Mara	Ascherman	mara.k.ascherman@xcelenergy.com	Xcel Energy		414 Nicollet Mall Fl 5 Minneapolis MN, 55401 United States	Electronic Service		No	M-25-378
12	Ray	Auginaush, Sr.	ray.auginaush@whiteearth-nsn.gov	White Earth Nation		White Earth Tribal Headquarters 35500 Eagle View Road Ogema MN, 56569 United States	Electronic Service		No	M-25-378
13	Mark	Bakk	mbakk@lcp.coop	Lake Country Power		26039 Bear Ridge Drive Cohasset MN, 55721 United States	Electronic Service		No	M-25-378

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
14	Ryan	Barlow	ryan.barlow@lawmoss.com	Moss & Barnett, a Professional Association		150 South Fifth St #1200 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-378
15	Jessica L	Bayles	jessica.bayles@stoel.com	Stoel Rives LLP		1150 18th St NW Ste 325 Washington DC, 20036 United States	Electronic Service		No	M-25-378
16	Daniel	Becchetti	dbecchetti@grenergy.com	Great River Energy		12300 Elm Creek Boulevard Maple Grove MN, 55369 United States	Electronic Service		No	M-25-378
17	Todd	Beck	tbeck@grenergy.com			null null, null United States	Electronic Service		No	M-25-378
18	David	Bell	david.bell@state.mn.us		Department of Health	POB 64975 St. Paul MN, 55164 United States	Electronic Service		No	M-25-378
19	Amadeo	Bellino	amadeo.bellino@whiteearth-nsn.gov	White Earth Nation		White Earth Tribal Headquarters 35500 Eagle View Road Ogema MN, 56569 United States	Electronic Service		No	M-25-378
20	David	Bender	dbender@earthjustice.org	Earthjustice		1001 G Street NW Suite 1000 Washington DC, 20001 United States	Electronic Service		No	M-25-378
21	Melanie	Benjamin	melanie.benjamin@millelacsband.com			43408 Oodena Drive Onamia MN, 56359 United States	Electronic Service		No	M-25-378
22	Sasha	Bergman	sasha.bergman@state.mn.us		Public Utilities Commission	121 7th PI E Ste 350 St. Paul MN, 55101 United States	Electronic Service		Yes	M-25-378
23	Laura	Bishop	laura.bishop@state.mn.us		Minnesota Pollution Control Agency	520 Lafayette Rd Saint Paul MN, 55155 United States	Electronic Service		No	M-25-378
24	Ingrid	Bjorklund	ibjorklund@avisenlegal.com	Avisen Legal		901 S. Marquette Ave. #1675 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-378
25	Ingrid	Bjorklund	ingrid@bjorklundlaw.com	Bjorklund Law, PLLC		855 Village Center Drive #256 North Oaks MN, 55127 United States	Electronic Service		No	M-25-378
26	Hunter	Boldt	hunterboldt@redlakenation.org	Red Lake Nation		15484 Migizi Drive Red Lake MN, 56671 United States	Electronic Service		No	M-25-378

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
27	Peter	Boney	pboney@boisforte-nsn.gov	Bois Forte Band of Chippewa		Bois Forte Tribal Government 5344 Lakeshore Drive Nett Lake MN, 55772 United States	Electronic Service		No	M-25-378
28	Sheldon	Boyd	sheldon.boyd@millelacsband.com	Mille Lacs Band of Ojibwe		43408 Oodena Drive Onamia MN, 56359 United States	Electronic Service		No	M-25-378
29	Jon	Brekke	jbrekke@grenergy.com	Great River Energy		12300 Elm Creek Boulevard Maple Grove MN, 55369-4718 United States	Electronic Service		No	M-25-378
30	Matthew	Brodin	mbrodin@allete.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	M-25-378
31	B. Andrew	Brown	brown.andrew@dorsey.com	Dorsey & Whitney LLP		Suite 1500 50 South Sixth Street Minneapolis MN, 55402-1498 United States	Electronic Service		No	M-25-378
32	Marvin Ray	Bruneau	marvin.bruneau@millelacsband.com	Mille Lacs Band of Ojibwe		43408 Oodena Drive Onamia MN, 56359 United States	Electronic Service		No	M-25-378
33	Christina	Brusven	cbrusven@fredlaw.com	Fredrikson Byron		60 S 6th St Ste 1500 Minneapolis MN, 55402-4400 United States	Electronic Service		No	M-25-378
34	Scott	Buchanan	scottbuchanan@fdlrez.com	Fond du Lac Band of Lake Superior Chippewa		1720 Big Lake Road Cloquet MN, 55720 United States	Electronic Service		No	M-25-378
35	Shelley	Buck	shelley.buck@piic.org	Prairie Island Indian Community		Prairie Island Indian Community 5636 Sturgeon Lake Road Welch MN, 55089 United States	Electronic Service		No	M-25-378
36	Robert	Budreau	robert.budreau@llojibwe.net	Leech Lake Band of Ojibwe		190 Sailstar Drive NW Cass Lake MN, 56633 United States	Electronic Service		No	M-25-378
37	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	M-25-378
38	James	Canaday	james.canaday@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	Suite 1400 445 Minnesota St. St. Paul MN, 55101 United States	Electronic Service		No	M-25-378
39	Thomas	Carlson	thomas.carlson@edf-re.com	EDF Renewable Energy		10 2nd St NE Ste. 400 Minneapolis	Electronic Service		No	M-25-378

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						MN, 55413 United States				
40	Cathy	Chavers	cchavers@boisforte-nsn.gov	Bois Forte Band of Chippewa		Bois Forte Tribal Government 5344 Lakeshore Drive Nett Lake MN, 55772 United States	Electronic Service		No	M-25-378
41	Joey	Cherney	joey.cherney@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	445 Minnesota Street STE 1800 Saint Paul MN, 55101 United States	Electronic Service		No	M-25-378
42	Marc	Child	mchild@greenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	M-25-378
43	John	Coffman	john@johncoffman.net	AARP		871 Tuxedo Blvd. St, Louis MO, 63119-2044 United States	Electronic Service		No	M-25-378
44	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	M-25-378
45	Jean	Comstock	jean.comstock.dbcc@gmail.com	St. Paul 350		729 6th St E St. Paul MN, 55106 United States	Electronic Service		No	M-25-378
46	Water Programs	Coordinator	waterprograms.bwsr@state.mn.us		Minnesota Board of Water and Soil Resources	520 Lafayette Road N St. Paul MN, 55155 United States	Electronic Service		No	M-25-378
47	George	Crocker	gwillc@nawo.org	North American Water Office		5093 Keats Avenue Lake Elmo MN, 55042 United States	Electronic Service		No	M-25-378
48	Rebecca	Crooks Stratton	rebecca.crooks-stratton@shakopeedakota.org	Shakopee Mdewakanton Sioux Community		Shakopee Mdewakanton Sioux Community 2330 Sioux Trail NW Prior Lake MN, 55372 United States	Electronic Service		No	M-25-378
49	Brooke	Cunningham	health.review@state.mn.us	Minnesota Department of Health		PO Box 64975 St. Paul MN, 55164-0975 United States	Electronic Service		No	M-25-378
50	Miyah	Danielson	miyahdanielson@fdlrez.com	Fond du Lac Band of Lake Superior Chippewa		1720 Big Lake Road Cloquet MN, 55720 United States	Electronic Service		No	M-25-378
51	Jason	Decker	jason.decker@llojibwe.net	Leech Lake Band of Ojibwe		190 Sailstar Drive NW Cass Lake MN, 56633 United States	Electronic Service		No	M-25-378
52	James	Denniston	james.r.denniston@xcelenergy.com	Xcel Energy Services, Inc.		414 Nicollet Mall, 401-8 Minneapolis MN, 55401 United States	Electronic Service		No	M-25-378

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
53	Bobby	Deschampe	robertdeschampe@grandportage.com	Grand Portage Band of Lake Superior Chippewa		PO Box 428 Grand Portage MN, 55605 United States	Electronic Service		No	M-25-378
54	Kami	Diver	kamidiver@fdlrez.com	Fond du Lac Band of Lake Superior Chippewa		1720 Big Lake Road Cloquet MN, 55720 United States	Electronic Service		No	M-25-378
55	Becky	Dobbs	bdobbs@grenergy.com			null null, null United States	Electronic Service		No	M-25-378
56	Ian M.	Dobson	ian.m.dobson@xcelenergy.com	Xcel Energy		414 Nicollet Mall, 401-8 Minneapolis MN, 55401 United States	Electronic Service		Yes	M-25-378
57	Randall	Doneen	randall.doneen@state.mn.us		Department of Natural Resources	500 Lafayette Rd, PO Box 25 Saint Paul MN, 55155 United States	Electronic Service		No	M-25-378
58	Richard	Dornfeld	richard.dornfeld@ag.state.mn.us		Office of the Attorney General - Department of Commerce	Minnesota Attorney General's Office 445 Minnesota Street, Suite 1800 Saint Paul MN, 55101 United States	Electronic Service		No	M-25-378
59	J.	Drake Hamilton	hamilton@fresh-energy.org	Fresh Energy		408 St Peter St Ste 350 Saint Paul MN, 55101 United States	Electronic Service		No	M-25-378
60	Shane	Drift	sdrift@boisforte-nsn.gov	Bois Forte Band of Chippewa		Bois Forte Tribal Government 5344 Lakeshore Drive Nett Lake MN, 55772 United States	Electronic Service		No	M-25-378
61	Christopher	Droske	christopher.droske@minneapolismn.gov	Northern States Power Company dba Xcel Energy-Elec		661 5th Ave N Minneapolis MN, 55405 United States	Electronic Service		No	M-25-378
62	Adam	Duininck	aduininck@ncsrcc.org	North Central States Regional Council of Carpenters		700 Olive Street St. Paul MN, 55130 United States	Electronic Service		No	M-25-378
63	Wally	Dupuis	wallydupuis@fdlband.org	Fond du Lac Band of Lake Superior Chippewa		1720 Big Lake Road Cloquet MN, 55720 United States	Electronic Service		No	M-25-378
64	Kevin	Dupuis, Sr.	kevindupuis@fdlrez.com			Reservation Business Committee 1720 Big Lake Rd Cloquet MN, 55720 United States	Electronic Service		No	M-25-378
65	Brian	Edstrom	briane@cubminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota St Ste W1360 Saint Paul MN, 55101 United States	Electronic Service		No	M-25-378

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
66	Jamie	Edwards	jamie.edwards@millelacsband.com	Mille Lacs Band of Ojibwe		43408 Oodena Drive Onamia MN, 56358 United States	Electronic Service		No	M-25-378
67	Michael	Fairbanks	michael.fairbanks@whiteearth-nsn.gov	White Earth Reservation Business Committee		PO Box 418 White Earth MN, 56591 United States	Electronic Service		No	M-25-378
68	Kate	Fairman	kate.fairman@state.mn.us		Department of Natural Resources	Box 32 500 Lafayette Rd St. Paul MN, 55155-4032 United States	Electronic Service		No	M-25-378
69	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	M-25-378
70	Annie	Felix Gerth	annie.felix-gerth@state.mn.us			Board of Water & Soil Resources 520 Lafayette Rd Saint Paul MN, 55155 United States	Electronic Service		No	M-25-378
71	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	M-25-378
72	Terri	Finn	terri.goggeleye@llojibwe.net			null null, null United States	Electronic Service		No	M-25-378
73	Mike	Fiterman	mikefiterman@libertydiversified.com	Liberty Diversified International		5600 N Highway 169 Minneapolis MN, 55428-3096 United States	Electronic Service		No	M-25-378
74	Christine	Fox	cfox@itasca-mantrap.com	Itasca-Mantrap		PO Box 192 Park Rapids MN, 56470 United States	Electronic Service		No	M-25-378
75	Lucas	Franco	lfranco@liunagro.com	LIUNA		81 Little Canada Rd E Little Canada MN, 55117 United States	Electronic Service		No	M-25-378
76	Gary	Frazer	gfrazier@mnchippewatribe.org	Minnesota Chippewa Tribe		PO Box 217 Cass Lake MN, 56633 United States	Electronic Service		No	M-25-378
77	Stacey	Fujii	sfujii@grenergy.com	Great River Energy		12300 Elm Creek Boulevard Maple Grove MN, 55369-4718 United States	Electronic Service		No	M-25-378
78	Edward	Garvey	garveyed@aol.com	Residence		32 Lawton St Saint Paul MN, 55102 United States	Electronic Service		No	M-25-378
79	Shannon	Geshick	shannon.geshick@state.mn.us	Minnesota Indian Affairs Council (MIAC)		null null, null United States	Electronic Service		No	M-25-378
80	Todd J.	Guerrero	todd.guerrero@kutakrock.com	Kutak Rock LLP		Suite 1750 220 South Sixth Street Minneapolis	Electronic Service		No	M-25-378

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						MN, 55402-1425 United States				
81	Jeffrey	Haase	jhaase@grenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	M-25-378
82	Hal	Halpern	halhalpern@clpower.com	Cooperative Light & Power		1554 Hwy 2 PO Box 69 Two Harbors MN, 55616 United States	Electronic Service		No	M-25-378
83	Jeremy	Hamilton	jhamilton@uppersiouxcommunity-nsn.gov	Upper Sioux Community		Upper Sioux Community PO Box 147 Granite Falls MN, 56241 United States	Electronic Service		No	M-25-378
84	David A.	Hansen	hansen@federatedrea.coop	Federated Rural Electric Association		77100 U.S. Highway 71 PO Box 69 Jackson MN, 56143 United States	Electronic Service		No	M-25-378
85	Amy	Hastings	amyh@uppersiouxcommunity-nsn.gov	Upper Sioux Community		5722 Travers Lane PO Box 147 Granite Falls MN, 56241 United States	Electronic Service		No	M-25-378
86	Erik	Hatlestad	erik@cureriver.org			117 1st St Montevideo MN, 56265 United States	Electronic Service		No	M-25-378
87	Kim	Havey	kim.havey@minneapolismn.gov	City of Minneapolis		350 South 5th Street, Suite 315M Minneapolis MN, 55415 United States	Electronic Service		No	M-25-378
88	Philip	Hayet	phayet@jkenn.com	J. Kennedy and Associates, Inc.		570 Colonial Park Drive Suite 305 Roswell GA, 30075-3770 United States	Electronic Service		No	M-25-378
89	Adam	Heinen	aheinen@dakotaelectric.com	Dakota Electric Association		4300 220th St W Farmington MN, 55024 United States	Electronic Service		No	M-25-378
90	Annete	Henkel	mui@mnutilityinvestors.org	Minnesota Utility Investors		413 Wacouta Street #230 St.Paul MN, 55101 United States	Electronic Service		No	M-25-378
91	Kristin	Henry	kristin.henry@sierraclub.org	Sierra Club		2101 Webster St Ste 1300 Oakland CA, 94612 United States	Electronic Service		No	M-25-378
92	Katherine	Hinderlie	katherine.hinderlie@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	445 Minnesota St Suite 1400 St. Paul MN, 55101-2134 United States	Electronic Service		No	M-25-378
93	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	M-25-378
94	Ronald	Horman	rhorman@redwoodelectric.com	Redwood Electric Cooperative		60 Pine Street Clements MN,	Electronic Service		No	M-25-378

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						56224 United States				
95	Kari	Howe	kari.howe@state.mn.us		DEED	332 Minnesota St, #E200 1ST National Bank Bldg St. Paul MN, 55101 United States	Electronic Service		No	M-25- 378
96	Robbie	Howe	robbie.howe@llojibwe.net	Leech Lake Band of Ojibwe		190 Sailstar Drive NW Cass Lake MN, 56633 United States	Electronic Service		No	M-25- 378
97	Dean	Hunter	dean.hunter@state.mn.us		Minnesota Department of Labor & Industry	443 Lafayette Rd N St. Paul MN, 55155-4341 United States	Electronic Service		No	M-25- 378
98	John	Ihle	ljihle@rrt.net	PlainStates Energy LLC		27451 S Hwy 34 Barnesville MN, 56514 United States	Electronic Service		No	M-25- 378
99	Annie	Jackson	cheryl.jackson@whiteearth-nsn.gov	White Earth Nation		White Earth Tribal Headquarters 35500 Eagle View Road Ogemo MN, 56569 United States	Electronic Service		No	M-25- 378
100	Faron	Jackson, Sr.	faron.jackson@llojibwe.net			190 Sailstar Drive NW Cass Lake MN, 56633 United States	Electronic Service		No	M-25- 378
101	Justin	Jahnz	justin.jahnz@ecemn.com	East Central Energy		412 Main Ave N Braham MN, 55006 United States	Electronic Service		No	M-25- 378
102	Alan	Jenkins	aj@jenkinsatlaw.com	Jenkins at Law		2950 Yellowtail Ave. Marathon FL, 33050 United States	Electronic Service		No	M-25- 378
103	Kevin	Jensvold	kevinj@upperSiouxcommunity-nsn.gov	Upper Sioux Community		PO Box 147 Granite Falls MN, 56241- 0147 United States	Electronic Service		No	M-25- 378
104	Annette	Johnson	annette.johnson@redlakenation.org	Red Lake Nation		15484 Migizi Drive Red Lake MN, 56671 United States	Electronic Service		No	M-25- 378
105	Richard	Johnson	rick.johnson@lawmoss.com	Moss & Barnett		150 S. 5th Street Suite 1200 Minneapolis MN, 55402 United States	Electronic Service		No	M-25- 378
106	Sarah	Johnson Phillips	sjphillips@stoel.com	Stoel Rives LLP		33 South Sixth Street Suite 4200 Minneapolis MN, 55402 United States	Electronic Service		No	M-25- 378
107	Mark	Kaminski	mark.kaminski@gsa.gov	General Services Administration		1800 F Street NW Washington DC, 20405 United States	Electronic Service		No	M-25- 378
108	Veda	Kanitz	vmkanitz@gmail.com			null null, null United States	Electronic Service		No	M-25- 378

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
109	Jenny	Kartes	jkartes@arrowhead.coop	Arrowhead Electric Cooperative, Inc.(P)		PO Box 39 5401 W Hwy 61 Lutsen MN, 55612 United States	Electronic Service		No	M-25-378
110	David	Kempf	dkempf@greenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	M-25-378
111	William	Kenworthy	will@votesolar.org			1 South Dearborn St Ste 2000 Chicago IL, 60603 United States	Electronic Service		No	M-25-378
112	Samuel B.	Ketchum	sketchum@kennedy-graven.com	Kennedy & Graven, Chartered		150 S 5th St Ste 700 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-378
113	Bobby	King	bking@solarunitedneighbors.org	Solar United Neighbors		3140 43rd Ave S Minneapolis MN, 55406 United States	Electronic Service		No	M-25-378
114	Raymond	Kirsch	raymond.kirsch@state.mn.us		Department of Commerce	85 7th Place E Ste 500 St. Paul MN, 55101 United States	Electronic Service		No	M-25-378
115	Frank	Kohlasch	frank.kohlasch@state.mn.us		Minnesota Pollution Control Agency	520 Lafayette Rd N. St. Paul MN, 55155 United States	Electronic Service		No	M-25-378
116	Brian	Kolbinger	brian@beckertownship.org	Becker Township Board		PO Box 248 12165 Hancock St Becker MN, 55308 United States	Electronic Service		No	M-25-378
117	Chad	Konickson	chad.konickson@usace.army.mil	U.S.Army Corps of Engineers		332 Minnesota St. Suite E1500 Saint Paul MN, 55101 United States	Electronic Service		No	M-25-378
118	Stacy	Kotch Egstad	stacy.kotch@state.mn.us		MINNESOTA DEPARTMENT OF TRANSPORTATION	395 John Ireland Blvd. St. Paul MN, 55155 United States	Electronic Service		No	M-25-378
119	Kay	Kuhlmann	teri.swanson@ci.red-wing.mn.us	City Of Red Wing		315 West Fourth Street Red Wing MN, 55066 United States	Electronic Service		No	M-25-378
120	Brenda	Kyle	bkyle@stpaulchamber.com	St. Paul Area Chamber of Commerce		401 N Robert Street Suite 150 St Paul MN, 55101 United States	Electronic Service		No	M-25-378
121	Therese	LaCanne	tlacanne@greenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	M-25-378
122	Matthew	Lacey	mlacey@greenergy.com	Great River Energy		12300 Elm Creek Boulevard Maple Grove MN, 55369-4718 United States	Electronic Service		No	M-25-378

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
123	Carmel	Laney	carmel.laney@stoel.com	Stoel Rives LLP		33 South Sixth Street Suite 4200 Minneapolis MN, 55402 United States	Electronic Service		No	M-25- 378
124	Arthur	LaRose	arthur.larose@llojibwe.net	Leech Lake Band of Ojibwe		190 Sailstar Drive NW Cass Lake MN, 56633 United States	Electronic Service		No	M-25- 378
125	Robert L	Larsen	robert.larsen@lowersioux.com	Lower Sioux Indian Community		PO Box 308 39527 Reservation Highway 1 Morton MN, 56270 United States	Electronic Service		No	M-25- 378
126	Mark	Larson	mlarson@meeker.coop	Meeker Coop Light & Power Assn		1725 Highway 12 E Ste 100 Litchfield MN, 55355 United States	Electronic Service		No	M-25- 378
127	Michelle	Larson	michelle@redwingchamber.com	Red Wing Area Chamber of Commerce		439 Main Street Red Wing, MN Bay Point Park MN, 55066 United States	Electronic Service		No	M-25- 378
128	Peder	Larson	plarson@larkinhoffman.com	Larkin Hoffman Daly & Lindgren, Ltd.		8300 Norman Center Drive Suite 1000 Bloomington MN, 55437 United States	Electronic Service		No	M-25- 378
129	Amber	Lee	amber.lee@stoel.com	Stoel Rives LLP		33 S. 6th Street Suite 4200 Minneapolis MN, 55402 United States	Electronic Service		No	M-25- 378
130	Rachel	Leonard	rachel.leonard@ci.monticello.mn.us	City of Monticello		505 Walnut St Ste 1 Monticello MN, 55362 United States	Electronic Service		No	M-25- 378
131	Dan	Leshner	dlesher@greenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	M-25- 378
132	Annie	Levenson Falk	annief@cubminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota Street, Suite W1360 St. Paul MN, 55101 United States	Electronic Service		No	M-25- 378
133	Michelle	Lommel	mlommel@greenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	M-25- 378
134	Alice	Madden	alice@communitypowermn.org	Community Power		2720 E 22nd St Minneapolis MN, 55406 United States	Electronic Service		No	M-25- 378
135	Kavita	Maini	kmairi@wi.rr.com	KM Energy Consulting, LLC		961 N Lost Woods Rd Oconomowoc WI, 53066 United States	Electronic Service		No	M-25- 378
136	Christine	Marquis	regulatory.records@xcelenergy.com	Xcel Energy		414 Nicollet Mall MN1180-07- MCA Minneapolis	Electronic Service		Yes	M-25- 378

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						MN, 55401 United States				
137	Dawn S	Marsh	dawn_marsh@fws.gov	U.S. Fish & Wildlife Service		Minnesota-Wisconsin Field Offices 4101 American Blvd E Bloomington MN, 55425 United States	Electronic Service		No	M-25-378
138	Emily	Marshall	emarshall@lourismarshall.com	Miller O'Brien Jensen, PA		120 S. 6th Street Suite 2400 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-378
139	Katherine	Marshall	katie.marshall@lawmoss.com	Moss & Barnett		150 S 5th St Ste 1200 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-378
140	Mary	Martinka	mary.a.martinka@xcelenergy.com	Xcel Energy Inc		414 Nicollet Mall 7th Floor Minneapolis MN, 55401 United States	Electronic Service		No	M-25-378
141	Gregg	Mast	gmast@cleanenergyeconomymn.org	Clean Energy Economy Minnesota		4808 10th Avenue S Minneapolis MN, 55417 United States	Electronic Service		No	M-25-378
142	Shena	Matrious	shena.matrious@millelacsband.com	Mille Lacs Band of Ojibwe		43408 Oodena Drive Onamia MN, 56349 United States	Electronic Service		No	M-25-378
143	Daryl	Maxwell	dmaxwell@hydro.mb.ca	Manitoba Hydro		360 Portage Ave FL 16 PO Box 815, Station Main Winnipeg MB, R3C 2P4 Canada	Electronic Service		No	M-25-378
144	Erica	McConnell	emcconnell@elpc.org	Environmental Law & Policy Center		35 E. Wacker Drive, Suite 1600 Chicago IL, 60601 United States	Electronic Service		No	M-25-378
145	April	McCormick	aprilm@grandportage.com	Grand Portage Band of Lake Superior Chippewa		PO Box 428 Grand Portage MN, 55605 United States	Electronic Service		No	M-25-378
146	Taylor	McNair	taylor@gridlab.org			668 Capp Street San Francisco CA, 94110 United States	Electronic Service		No	M-25-378
147	Ronald	Meier	rmeier@mcleodcoop.com	Mcleod Cooperative Power		3515 11th St East Glencoe MN, 55336 United States	Electronic Service		No	M-25-378
148	Melanie	Mesko Lee	melanie.lee@burnsvillemn.gov	City of Burnsville		100 Civic Center Parkway Burnsville MN, 55337-3867 United States	Electronic Service		No	M-25-378
149	Peder	Mewis	pmewis@cleangridalliance.org	Clean Grid Alliance		570 Asbury St. St. Paul MN, 55104 United States	Electronic Service		No	M-25-378

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
150	Valentina	Mgeni	valentina.mgeni@piic.org	Prairie Island Indian Community		Prairie Island Indian Community 5636 Sturgeon Lake Road Welch MN, 55089 United States	Electronic Service		No	M-25-378
151	Cole W.	Miller	cole.miller@shakopeedakota.org	Shakopee Mdewakanton Sioux Community		Shakopee Mdewakanton Sioux Community 2330 Sioux Trail NW Prior Lake MN, 55372 United States	Electronic Service		No	M-25-378
152	Stacy	Miller	stacy.miller@minneapolismn.gov	City of Minneapolis		350 S. 5th Street Room M 301 Minneapolis MN, 55415 United States	Electronic Service		No	M-25-378
153	David	Moeller	dmoeller@allete.com	Minnesota Power			Electronic Service		No	M-25-378
154	Sarah	Mooradian	sarah@curemn.org	CURE		117 South 1st Street Montevideo MN, 56265 United States	Electronic Service		No	M-25-378
155	Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP		33 South Sixth St Ste 4200 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-378
156	Travis	Morrison	travis.morrison@boisforte-nsn.gov	Bois Forte Band of Chippewa		Bois Forte Tribal Government 5344 Lakeshore Drive Nett Lake MN, 55772 United States	Electronic Service		No	M-25-378
157	David	Morrison, Sr.	david.morrison@boisforte-nsn.gov	Bois Forte Band of Chippewa		Bois Forte Tribal Government 5344 Lakeshore Drive Nett Lake MN, 55772 United States	Electronic Service		No	M-25-378
158	Evan	Mulholland	emulholland@mncenter.org	Minnesota Center for Environmental Advocacy		1919 University Ave W Ste 515 Saint Paul MN, 55101 United States	Electronic Service		No	M-25-378
159	Alan	Muller	alan@greendel.org	Energy & Environmental Consulting		1110 West Avenue Red Wing MN, 55066 United States	Electronic Service		No	M-25-378
160	Sonny	Myers	smyers@1854treatyauthority.org	1854 Treaty Authority		4428 Haines Rd Duluth MN, 55811-1524 United States	Electronic Service		No	M-25-378
161	Pouya	Najmaie	najm0001@gmail.com	Cooperative Energy Futures		3416 16th Ave S Minneapolis MN, 55407 United States	Electronic Service		No	M-25-378
162	Carl	Nelson	cnelson@mncee.org	Center for Energy and Environment		212 3rd Ave N Ste 560 Minneapolis	Electronic Service		No	M-25-378

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						MN, 55401 United States				
163	Deb	Nelson	dnelson@greenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	M-25-378
164	David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency		220 South Sixth Street Suite 1300 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-378
165	Duane	Ninneman	duane@cureriver.org	Clean Up the River Environment		117 South 1st St Montevideo MN, 56265 United States	Electronic Service		No	M-25-378
166	M. William	O'Brien	bobrien@mojlaw.com	Miller O'Brien Jensen, P.A.		120 S 6th St Ste 2400 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-378
167	Ric	O'Connell	ric@gridlab.org	GridLab		2120 University Ave Berkeley CA, 94704 United States	Electronic Service		No	M-25-378
168	Logan	O'Grady	logrady@mnseia.org	Minnesota Solar Energy Industries Association		2288 University Ave W St. Paul MN, 55114 United States	Electronic Service		No	M-25-378
169	Joseph	OBrien	joey.obrien@lowersioux.com			39527 Highway 1 Morton MN, 56270 United States	Electronic Service		No	M-25-378
170	Carol A.	Overland	overland@legalelectric.org	Legalelectric - Overland Law Office		1110 West Avenue Red Wing MN, 55066 United States	Electronic Service		No	M-25-378
171	Gregory	Padden	gpadden@greenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	M-25-378
172	Jessica	Palmer Denig	jessica.palmer-denig@state.mn.us		Office of Administrative Hearings	600 Robert St N PO Box 64620 St. Paul MN, 55164 United States	Electronic Service		No	M-25-378
173	Marsha	Parlow	mparlow@greenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	M-25-378
174	Priti	Patel	ppatel@greenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369-4718 United States	Electronic Service		No	M-25-378
175	Earl	Pendleton	earl.pendleton@lowersioux.com	Lower Sioux Indian Community		39527 Highway 1 Morton MN, 56270 United States	Electronic Service		No	M-25-378
176	Gordon	Pietsch	gpietsch@greenergy.com	Great River Energy		12300 Elm Creek Blvd. Maple Grove MN, 55369-4718 United States	Electronic Service		No	M-25-378

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
177	Joe	Plumer	joe.plumer@redlakenation.org	Red Lake Nation		15484 Migizi Drive Red Lake MN, 56671 United States	Electronic Service		No	M-25-378
178	J.	Porter	greg.porter@nngco.com	Northern Natural Gas Company		1111 South 103rd St Omaha NE, 68124 United States	Electronic Service		No	M-25-378
179	Brian H.	Potts	brian.potts@huschblackwell.com	Husch Blackwell		33 E Main St Ste 300 Madison WI, 53703 United States	Electronic Service		No	M-25-378
180	Kevin	Pranis	kpranis@liunagroc.com	Laborers' District Council of MN and ND		81 E Little Canada Road St. Paul MN, 55117 United States	Electronic Service		No	M-25-378
181	Robert	Prescott	bob.prescott@lowersioux.com	Lower Sioux Indian Community		39527 Highway 1 Morton MN, 56270 United States	Electronic Service		No	M-25-378
182	Jody	Puddu	jody.puddu@piic.org	Prairie Island Indian Community		5636 Sturgeon Lake Rd Welch MN, 55089 United States	Electronic Service		No	M-25-378
183	Kurt	Rempe	krempe@nationalgridrenewables.com	National Grid Renewables Development, LLC		8400 Normandale Lake Blvd Suite 1200 Bloomington MN, 55437 United States	Electronic Service		No	M-25-378
184	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	M-25-378
185	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	M-25-378
186	Stephan	Roos	stephan.roos@state.mn.us		Minnesota Department of Agriculture	625 Robert St N Saint Paul MN, 55155-2538 United States	Electronic Service		No	M-25-378
187	Alan	Roy	alan.roy@whiteearth-nsn.gov	White Earth Nation		White Earth Tribal Headquarters 35500 Eagle View Road Ogema MN, 56569 United States	Electronic Service		No	M-25-378
188	Bill	Rudnicki	bill.rudnicki@shakopeedakota.org	Shakopee Mdewakanton Sioux Community		Shakopee Mdewakanton Sioux Community 2330 Sioux Trail NW Prior Lake MN, 55372 United States	Electronic Service		No	M-25-378
189	Nathaniel	Runke	nrunke@local49.org			611 28th St. NW Rochester MN, 55901 United States	Electronic Service		No	M-25-378

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
190	Zachary	Ruzycki	zruzycki@grenergy.com	Great River Energy		12300 Elm Creek Boulevard Maple Grove MN, 55369 United States	Electronic Service		No	M-25-378
191	Miranda	Sam	miranda.sam@lowersioux.com	Lower Sioux Indian Community		39527 Reservation Highway 1 PO Box 308 Morton MN, 56270 United States	Electronic Service		No	M-25-378
192	Joseph L	Sathe	jsathe@kennedy-graven.com	Kennedy & Graven, Chartered		150 S 5th St Ste 700 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-378
193	Adam	Savariego	adams@uppersiouxcommunity-nsn.gov	Upper Sioux Community		5722 Travers Lane PO Box 147 Granite Falls MN, 56241 United States	Electronic Service		No	M-25-378
194	Richard J.	Savelkoul	rsavelkoul@martinsquires.com	Martin & Squires, PA		332 Minnesota St Ste W2750 St. Paul MN, 55101 United States	Electronic Service		No	M-25-378
195	Jeff	Schneider	jeff.schneider@ci.red-wing.mn.us	City of Red Wing		315 West 4th Street Red Wing MN, 55066 United States	Electronic Service		No	M-25-378
196	Peter	Scholtz	peter.scholtz@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	Suite 1400 445 Minnesota Street St. Paul MN, 55101-2131 United States	Electronic Service		No	M-25-378
197	Ronald J.	Schwartau	rschwartau@noblesce.com	Nobles Electric Cooperative		22636 U.S. Hwy. 59 Worthington MN, 56187 United States	Electronic Service		No	M-25-378
198	Douglas	Seaton	doug.seaton@umwlc.org	Upper Midwest Law Center		8421 Wayzata Blvd Ste 300 Golden Valley MN, 55426 United States	Electronic Service		No	M-25-378
199	Jessie	Seim	jessie.seim@piic.org	Prairie Island Indian Community		5636 Sturgeon Lake Rd Welch MN, 55089 United States	Electronic Service		No	M-25-378
200	Darrell	Seki, Sr.	dseki@redlakenation.org			15484 Migizi Drive Red Lake MN, 56671 United States	Electronic Service		No	M-25-378
201	Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates		7400 Lyndale Ave S Ste 190 Richfield MN, 55423 United States	Electronic Service		No	M-25-378
202	Andrew R.	Shedlock	andrew.shedlock@kutakrock.com	Kutak Rock LLP		60 South Sixth St Ste 3400 Minneapolis MN, 55402-4018 United States	Electronic Service		No	M-25-378
203	Beth	Smith	bsmith@greatermankato.com	Greater Mankato Growth		1961 Premier Dr Ste 100 Mankato MN,	Electronic Service		No	M-25-378

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						56001 United States				
204	Joel	Smith	jsmith@mnchippewatribe.org	Minnesota Chippewa Tribe		PO Box 217 Cass Lake MN, 56633 United States	Electronic Service		No	M-25-378
205	Joshua	Smith	joshua.smith@sierraclub.org			85 Second St FL 2 San Francisco CA, 94105 United States	Electronic Service		No	M-25-378
206	Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.		76 W Kellogg Blvd St. Paul MN, 55102 United States	Electronic Service		No	M-25-378
207	Nizhoni	Smith	nizhoni.smith@lowersioux.com	Lower Sioux Indian Community		PO Box 308 39527 Reservation Highway 1 Morton MN, 56270 United States	Electronic Service		No	M-25-378
208	Roger	Smith, Sr.	rogermsmithsr@fdlrez.com			1720 Big Lake Road Cloquet MN, 55720 United States	Electronic Service		No	M-25-378
209	Beth	Soholt	bsoholt@cleangridalliance.org	Clean Grid Alliance		570 Asbury Street Suite 201 St. Paul MN, 55104 United States	Electronic Service		No	M-25-378
210	Anna	Sommer	asommer@energyfuturesgroup.com	Energy Futures Group		PO Box 692 Canton NY, 13617 United States	Electronic Service		No	M-25-378
211	Marie	Spry	mariespry@grandportage.com			PO Box 428 Grand Portage MN, 55605 United States	Electronic Service		No	M-25-378
212	Mark	Spurr	mspurr@fvbenergy.com	International District Energy Association		222 South Ninth St., Suite 825 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-378
213	Michael	Stalberger	michael.stalberger@blueearthcountymn.gov	Blue Earth County		410 S 5th Street Mankato MN, 56001 United States	Electronic Service		No	M-25-378
214	Sean	Stalpes	sean.stalpes@state.mn.us		Public Utilities Commission	121 E. 7th Place, Suite 350 Saint Paul MN, 55101-2147 United States	Electronic Service		No	M-25-378
215	LeRoy	Staples Fairbanks III	leroy.fairbanks@llojibwe.net	Leech Lake Band of Ojibwe		190 Sailstar Drive NW Cass Lake MN, 56633 United States	Electronic Service		No	M-25-378
216	Byron E.	Starns	byron.starns@stinson.com	STINSON LLP		50 S 6th St Ste 2600 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-378
217	Mark	Strohfus	mstrohfus@greenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	M-25-378

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
218	Samuel	Strong	sam.strong@redlakenation.org	Red Lake Nation		15484 Migizi Drive Red Lake MN, 56671 United States	Electronic Service		No	M-25-378
219	Timothy	Sullivan	tsullivan@whe.org	Wright Hennepin Coop. Electric Assn.		6800 Electric Drive PO Box 330 Rockford MN, 55373 United States	Electronic Service		No	M-25-378
220	David	Sunderman	daves@benco.org	BENCO (DUPLICATE)		PO Box 8 Mankato MN, 56002-0008 United States	Electronic Service		No	M-25-378
221	Camille	Tanhoff	kamip@uppersiouxcommunity-nsn.gov	Upper Sioux Community		5722 Travers Lane PO BOX 147 Granite Falls MN, 56241 United States	Electronic Service		No	M-25-378
222	Tim	Thompson	tthompson@lrec.coop	Lake Region Electric Cooperative		PO Box 643 1401 South Broadway Pelican Rapids MN, 56572 United States	Electronic Service		No	M-25-378
223	Geoffrey	Tolley	geoff.tolley@gmail.com			855 Stanley Road Two Harbors MN, 55616-1176 United States	Electronic Service		No	M-25-378
224	Jayne	Trusty	execdir@swrdc.org	SWRDC		2401 Broadway Ave #1 Slayton MN, 56172 United States	Electronic Service		No	M-25-378
225	Caralyn	Trutna	carrie@uppersiouxcommunity-nsn.gov	Upper Sioux Community		Upper Sioux Community P.O. Box 147 Granite Falls MN, 55372 United States	Electronic Service		No	M-25-378
226	Jen	Tyler	tyler.jennifer@epa.gov	US Environmental Protection Agency		Environmental Planning & Evaluation Unit 77 W Jackson Blvd. Mailstop B-19J Chicago IL, 60604-3590 United States	Electronic Service		No	M-25-378
227	Jackie	Van Norman	jvannorman@grenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	M-25-378
228	Christopher	Villarreal	cvillarreal@rstreet.org	R Street Institute		1212 New York Ave NW Ste 900 Washington DC, 20005 United States	Electronic Service		No	M-25-378
229	Sam	Villella	sdvillella@gmail.com			10534 Alamo Street NE Blaine MN, 55449 United States	Electronic Service		No	M-25-378
230	Carla	Vita	carla.vita@state.mn.us	MN DEED		Great Northern Building 12th Floor 180 East Fifth Street St. Paul MN,	Electronic Service		No	M-25-378

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						55101 United States				
231	Julie	Voeck	julie.voeck@nee.com	NextEra Energy Resources, LLC		700 Universe Blvd Juno Beach FL, 33408 United States	Electronic Service		No	M-25-378
232	Amelia	Vohs	avohs@mncenter.org	Minnesota Center for Environmental Advocacy		1919 University Avenue West Suite 515 St. Paul MN, 55104 United States	Electronic Service		No	M-25-378
233	Trent	Waite	twaite@greenergy.com			null null, null United States	Electronic Service		No	M-25-378
234	Cynthia	Warzecha	cynthia.warzecha@state.mn.us	Minnesota Department of Natural Resources		500 Lafayette Road Box 25 St. Paul MN, 55155-4040 United States	Electronic Service		No	M-25-378
235	Julianna	Wei	julianna.wei@rondo.com	Rondo Energy, Inc.		1960 North Loop Alameda CA, 94502 United States	Electronic Service		No	M-25-378
236	Heather	Westra	heather.westra@piic.org	Prairie Island Indian Community		5636 Sturgeon Lake Rd Welch MN, 55089 United States	Electronic Service		No	M-25-378
237	Alan	Whipple	sa.property@state.mn.us		Minnesota Department Of Revenue	Property Tax Division 600 N. Robert Street St. Paul MN, 55146-3340 United States	Electronic Service		No	M-25-378
238	Steve	White	steve.white@llojibwe.net	Leech Lake Band of Ojibwe		190 Sailstar Drive NW Cass Lake MN, 56633 United States	Electronic Service		No	M-25-378
239	Cody	Whitebear	cody.whitebear@piic.org	Prairie Island Indian Community		5636 Sturgeon Lake Road Welch MN, 55089 United States	Electronic Service		No	M-25-378
240	John	Williams	jwilliams@greenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	M-25-378
241	Laurie	Williams	laurie.williams@sierraclub.org	Sierra Club		Environmental Law Program 1536 Wynkoop St Ste 200 Denver CO, 80202 United States	Electronic Service		No	M-25-378
242	Virgil	Wind	virgil.wind@millelacsband.com	Mille Lacs Band of Ojibwe		43408 Oodena Drive Onamia MN, 56359 United States	Electronic Service		No	M-25-378
243	Joseph	Windler	jwindler@winthrop.com	Winthrop & Weinstine		225 South Sixth Street, Suite 3500 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-378
244	Rob	Witwer	rob.witwer@onwardenergy.com	Onward Energy		767 Third Ave 17th Floor	Electronic Service		No	M-25-378

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
				Holdings, LLC		New York NY, 10017 United States				
245	Jonathan	Wolfgram	jonathan.wolfgram@state.mn.us		Office of Pipeline Safety	445 Minnesota St Ste 147 Woodbury MN, 55125 United States	Electronic Service		No	M-25-378
246	Tim	Wulling	t.wulling@earthlink.net			1495 Raymond Ave. Saint Paul MN, 55108 United States	Electronic Service		No	M-25-378
247	Laurie	York	laurie.york@whiteearth-nsn.gov	White Earth Reservation Business Committee		PO Box 418 White Earth MN, 56591 United States	Electronic Service		No	M-25-378
248	Curtis	Zaun	czaun@mnseia.org	MnSEIA		PO Box 8141 Saint Paul MN, 55108 United States	Electronic Service		No	M-25-378
249	Kurt	Zimmerman	kwz@ibew160.org	Local Union #160, IBEW		2909 Anthony Ln St Anthony Village MN, 55418-3238 United States	Electronic Service		No	M-25-378
250	Emily	Ziring	eziring@stlouispark.org	City of St. Louis Park		5005 Minnetonka Blvd St. Louis Park MN, 55416 United States	Electronic Service		No	M-25-378
251	Patrick	Zomer	pzomer@cozen.com	Cozen O'Connor		150 S. 5th Street, #1200 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-378
252	David	Zoppo	david.zoppo@huschblackwell.com	American Transmission Company LLC		33 East Main Street Suite 300 Madison WI, 53703 United States	Electronic Service		No	M-25-378

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
1	Steve	Albrecht	steve.albrecht@shakopeedakota.org	Shakopee Mdwakanton Sioux Community		Shakopee Mdwakanton Sioux Community 2330 Sioux Trail NW Prior Lake MN, 55372 United States	Electronic Service		No	24-67
2	Jared	Alholinna	jaholinna@grenergy.com	Great River Energy		12300 Elm Creek Boulevard Maple Grove MN, 55369 United States	Electronic Service		No	24-67
3	Keith	Anderson	keith.anderson@shakopeedakota.org	Shakopee Mdwakanton Sioux Community		Shakopee Mdwakanton Sioux Community 2330 Sioux Trail NW Prior Lake MN, 55372 United States	Electronic Service		No	24-67
4	Shannon	Anderson	sanderson@solarunitedneighbors.org	Solar United Neighbors			Electronic Service		No	24-67
5	Beren	Argetsinger	bargetsinger@keyesfox.com			PO BOX 166 Burdett NY, 14818 United States	Electronic Service		No	24-67
6	Ray	Auginaush, Sr.	ray.auginaush@whiteearth-nsn.gov	White Earth Nation		White Earth Tribal Headquarters 35500 Eagle View Road Ogema MN, 56569 United States	Electronic Service		No	24-67
7	Mark	Bakk	mbakk@lcp.coop	Lake Country Power		26039 Bear Ridge Drive Cohasset MN, 55721 United States	Electronic Service		No	24-67
8	Daniel	Becchetti	dbecchetti@grenergy.com	Great River Energy		12300 Elm Creek Boulevard Maple Grove MN, 55369 United States	Electronic Service		No	24-67
9	Todd	Beck	tbeck@grenergy.com			null null, null United States	Electronic Service		No	24-67
10	Amadeo	Bellino	amadeo.bellino@whiteearth-nsn.gov	White Earth Nation		White Earth Tribal Headquarters 35500 Eagle View Road Ogema MN, 56569 United States	Electronic Service		No	24-67
11	Melanie	Benjamin	melanie.benjamin@millelacsband.com			43408 Oodena Drive Onamia MN, 56359 United States	Electronic Service		No	24-67
12	Sasha	Bergman	sasha.bergman@state.mn.us		Public Utilities Commission	121 7th PI E Ste 350 St. Paul MN, 55101 United States	Electronic Service		Yes	24-67
13	Laura	Bishop	laura.bishop@state.mn.us		Minnesota Pollution Control Agency	520 Lafayette Rd Saint Paul MN, 55155 United States	Electronic Service		No	24-67

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
14	Ingrid	Bjorklund	ingrid@bjorklundlaw.com	Bjorklund Law, PLLC		855 Village Center Drive #256 North Oaks MN, 55127 United States	Electronic Service		No	24-67
15	Hunter	Boldt	hunterboldt@redlakenation.org	Red Lake Nation		15484 Migizi Drive Red Lake MN, 56671 United States	Electronic Service		No	24-67
16	Peter	Boney	pboney@boisforte-nsn.gov	Bois Forte Band of Chippewa		Bois Forte Tribal Government 5344 Lakeshore Drive Nett Lake MN, 55772 United States	Electronic Service		No	24-67
17	Sheldon	Boyd	sheldon.boyd@millelacsband.com	Mille Lacs Band of Ojibwe		43408 Oodena Drive Onamia MN, 56359 United States	Electronic Service		No	24-67
18	Jon	Brekke	jbrekke@grenergy.com	Great River Energy		12300 Elm Creek Boulevard Maple Grove MN, 55369-4718 United States	Electronic Service		No	24-67
19	Matthew	Brodin	mbrodin@allete.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	24-67
20	B. Andrew	Brown	brown.andrew@dorsey.com	Dorsey & Whitney LLP		Suite 1500 50 South Sixth Street Minneapolis MN, 55402-1498 United States	Electronic Service		No	24-67
21	Marvin Ray	Bruneau	marvin.bruneau@millelacsband.com	Mille Lacs Band of Ojibwe		43408 Oodena Drive Onamia MN, 56359 United States	Electronic Service		No	24-67
22	Christina	Brusven	cbrusven@fredlaw.com	Fredrikson Byron		60 S 6th St Ste 1500 Minneapolis MN, 55402-4400 United States	Electronic Service		No	24-67
23	Scott	Buchanan	scottbuchanan@fdlrez.com	Fond du Lac Band of Lake Superior Chippewa		1720 Big Lake Road Cloquet MN, 55720 United States	Electronic Service		No	24-67
24	Shelley	Buck	shelley.buck@piic.org	Prairie Island Indian Community		Prairie Island Indian Community 5636 Sturgeon Lake Road Welch MN, 55089 United States	Electronic Service		No	24-67
25	Robert	Budreau	robert.budreau@llojibwe.net	Leech Lake Band of Ojibwe		190 Sailstar Drive NW Cass Lake MN, 56633 United States	Electronic Service		No	24-67

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
26	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	24-67
27	Cathy	Chavers	cchavers@boisforte-nsn.gov	Bois Forte Band of Chippewa		Bois Forte Tribal Government 5344 Lakeshore Drive Nett Lake MN, 55772 United States	Electronic Service		No	24-67
28	Marc	Child	mchild@greenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	24-67
29	John	Coffman	john@johncoffman.net	AARP		871 Tuxedo Blvd. St. Louis MO, 63119-2044 United States	Electronic Service		No	24-67
30	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	24-67
31	George	Crocker	gwillc@nawo.org	North American Water Office		5093 Keats Avenue Lake Elmo MN, 55042 United States	Electronic Service		No	24-67
32	Rebecca	Crooks Stratton	rebecca.crooks-stratton@shakopeedakota.org	Shakopee Mdewakanton Sioux Community		Shakopee Mdewakanton Sioux Community 2330 Sioux Trail NW Prior Lake MN, 55372 United States	Electronic Service		No	24-67
33	Brooke	Cunningham	health.review@state.mn.us	Minnesota Department of Health		PO Box 64975 St. Paul MN, 55164-0975 United States	Electronic Service		No	24-67
34	Miyah	Danielson	miyahdanielson@fdlrez.com	Fond du Lac Band of Lake Superior Chippewa		1720 Big Lake Road Cloquet MN, 55720 United States	Electronic Service		No	24-67
35	Jason	Decker	jason.decker@llojibwe.net	Leech Lake Band of Ojibwe		190 Sailstar Drive NW Cass Lake MN, 56633 United States	Electronic Service		No	24-67
36	Bobby	Deschampe	robertdeschampe@grandportage.com	Grand Portage Band of Lake Superior Chippewa		PO Box 428 Grand Portage MN, 55605 United States	Electronic Service		No	24-67
37	Kami	Diver	kamidiver@fdlrez.com	Fond du Lac Band of Lake Superior Chippewa		1720 Big Lake Road Cloquet MN, 55720 United States	Electronic Service		No	24-67
38	Becky	Dobbs	bdobbs@greenergy.com			null null, null United States	Electronic Service		No	24-67

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
39	Ian M.	Dobson	ian.m.dobson@xcelenergy.com	Xcel Energy		414 Nicollet Mall, 401-8 Minneapolis MN, 55401 United States	Electronic Service		No	24-67
40	Shane	Drift	sdrift@boisforte-nsn.gov	Bois Forte Band of Chippewa		Bois Forte Tribal Government 5344 Lakeshore Drive Nett Lake MN, 55772 United States	Electronic Service		No	24-67
41	Christopher	Droske	christopher.droske@minneapolismn.gov	Northern States Power Company dba Xcel Energy-Elec		661 5th Ave N Minneapolis MN, 55405 United States	Electronic Service		No	24-67
42	Adam	Duininck	aduininck@ncsrcc.org	North Central States Regional Council of Carpenters		700 Olive Street St. Paul MN, 55130 United States	Electronic Service		No	24-67
43	Wally	Dupuis	wallydupuis@fdlband.org	Fond du Lac Band of Lake Superior Chippewa		1720 Big Lake Road Cloquet MN, 55720 United States	Electronic Service		No	24-67
44	Kevin	Dupuis, Sr.	kevindupuis@fdlrez.com			Reservation Business Committee 1720 Big Lake Rd Cloquet MN, 55720 United States	Electronic Service		No	24-67
45	Jamie	Edwards	jamie.edwards@millelacsband.com	Mille Lacs Band of Ojibwe		43408 Oodena Drive Onamia MN, 56358 United States	Electronic Service		No	24-67
46	Michael	Fairbanks	michael.fairbanks@whiteearth-nsn.gov	White Earth Reservation Business Committee		PO Box 418 White Earth MN, 56591 United States	Electronic Service		No	24-67
47	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	24-67
48	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	24-67
49	Terri	Finn	terri.goggleye@llojibwe.net			null null, null United States	Electronic Service		No	24-67
50	Christine	Fox	cfox@itasca-mantrap.com	Itasca-Mantrap Coop. Electric Assn.		PO Box 192 Park Rapids MN, 56470 United States	Electronic Service		No	24-67
51	Lucas	Franco	lfranco@liunagroc.com	LIUNA		81 Little Canada Rd E Little Canada MN, 55117 United States	Electronic Service		No	24-67
52	Gary	Frazer	gfrazer@mnchippewatribe.org	Minnesota Chippewa Tribe		PO Box 217 Cass Lake	Electronic Service		No	24-67

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						MN, 56633 United States				
53	Stacey	Fujii	sfujii@grenergy.com	Great River Energy		12300 Elm Creek Boulevard Maple Grove MN, 55369-4718 United States	Electronic Service		No	24-67
54	Edward	Garvey	garveyed@aol.com	Residence		32 Lawton St Saint Paul MN, 55102 United States	Electronic Service		No	24-67
55	Shannon	Geshick	shannon.geshick@state.mn.us	Minnesota Indian Affairs Council (MIAC)		null null, null United States	Electronic Service		No	24-67
56	Jeffrey	Haase	jhaase@grenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	24-67
57	Hal	Halpern	halhalpern@clpower.com	Cooperative Light & Power		1554 Hwy 2 P0 Box 69 Two Harbors MN, 55616 United States	Electronic Service		No	24-67
58	Jeremy	Hamilton	jhamilton@uppersiouxcommunity-nsn.gov	Upper Sioux Community		Upper Sioux Community PO Box 147 Granite Falls MN, 56241 United States	Electronic Service		No	24-67
59	David A.	Hansen	hansen@federatedrea.coop	Federated Rural Electric Association		77100 U.S. Highway 71 PO Box 69 Jackson MN, 56143 United States	Electronic Service		No	24-67
60	Amy	Hastings	amyh@uppersiouxcommunity-nsn.gov	Upper Sioux Community		5722 Travers Lane PO Box 147 Granite Falls MN, 56241 United States	Electronic Service		No	24-67
61	Erik	Hatlestad	erik@cureriver.org			117 1st St Montevideo MN, 56265 United States	Electronic Service		No	24-67
62	Adam	Heinen	aheinen@dakotaelectric.com	Dakota Electric Association		4300 220th St W Farmington MN, 55024 United States	Electronic Service		No	24-67
63	Kristin	Henry	kristin.henry@sierraclub.org	Sierra Club		2101 Webster St Ste 1300 Oakland CA, 94612 United States	Electronic Service		No	24-67
64	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	24-67
65	Ronald	Horman	rhorman@redwoodelectric.com	Redwood Electric Cooperative		60 Pine Street Clements MN, 56224 United States	Electronic Service		No	24-67
66	Robbie	Howe	robbie.howe@llojibwe.net	Leech Lake Band of Ojibwe		190 Sailstar Drive NW Cass Lake MN, 56633 United States	Electronic Service		No	24-67

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
67	John	Ihle	ljihle@rrt.net	PlainStates Energy LLC		27451 S Hwy 34 Barnesville MN, 56514 United States	Electronic Service		No	24-67
68	Annie	Jackson	cheryl.jackson@whiteearth-nsn.gov	White Earth Nation		White Earth Tribal Headquarters 35500 Eagle View Road Ogemo MN, 56569 United States	Electronic Service		No	24-67
69	Faron	Jackson, Sr.	faron.jackson@llojibwe.net			190 Sailstar Drive NW Cass Lake MN, 56633 United States	Electronic Service		No	24-67
70	Justin	Jahnz	justin.jahnz@ecemn.com	East Central Energy		412 Main Ave N Braham MN, 55006 United States	Electronic Service		No	24-67
71	Alan	Jenkins	aj@jenkinsatlaw.com	Jenkins at Law		2950 Yellowtail Ave. Marathon FL, 33050 United States	Electronic Service		No	24-67
72	Kevin	Jensvold	kevinj@uppersiouxcommunity-nsn.gov	Upper Sioux Community		PO Box 147 Granite Falls MN, 56241-0147 United States	Electronic Service		No	24-67
73	Annette	Johnson	annette.johnson@redlakenation.org	Red Lake Nation		15484 Migizi Drive Red Lake MN, 56671 United States	Electronic Service		No	24-67
74	Richard	Johnson	rick.johnson@lawmoss.com	Moss & Barnett		150 S. 5th Street Suite 1200 Minneapolis MN, 55402 United States	Electronic Service		No	24-67
75	Sarah	Johnson Phillips	sphillips@stoel.com	Stoel Rives LLP		33 South Sixth Street Suite 4200 Minneapolis MN, 55402 United States	Electronic Service		No	24-67
76	Mark	Kaminski	mark.kaminski@gsa.gov	General Services Administration		1800 F Street NW Washington DC, 20405 United States	Electronic Service		No	24-67
77	Veda	Kanitz	vmkanitz@gmail.com			null null, null United States	Electronic Service		No	24-67
78	Jenny	Kartes	jkartes@arrowhead.coop	Arrowhead Electric Cooperative, Inc.(P)		PO Box 39 5401 W Hwy 61 Lutsen MN, 55612 United States	Electronic Service		No	24-67
79	David	Kempf	dkempf@greenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	24-67
80	William	Kenworthy	will@votesolar.org			1 South Dearborn St Ste 2000 Chicago IL,	Electronic Service		No	24-67

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						60603 United States				
81	Bobby	King	bking@solarunitedneighbors.org	Solar United Neighbors		3140 43rd Ave S Minneapolis MN, 55406 United States	Electronic Service		No	24-67
82	Therese	LaCanne	tlacanne@greenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	24-67
83	Matthew	Lacey	mlacey@greenergy.com	Great River Energy		12300 Elm Creek Boulevard Maple Grove MN, 55369-4718 United States	Electronic Service		No	24-67
84	Arthur	LaRose	arthur.larose@llojibwe.net	Leech Lake Band of Ojibwe		190 Sailstar Drive NW Cass Lake MN, 56633 United States	Electronic Service		No	24-67
85	Robert L	Larsen	robert.larsen@lowersioux.com	Lower Sioux Indian Community		PO Box 308 39527 Reservation Highway 1 Morton MN, 56270 United States	Electronic Service		No	24-67
86	Mark	Larson	mlarson@meecker.coop	Meeker Coop Light & Power Assn		1725 Highway 12 E Ste 100 Litchfield MN, 55355 United States	Electronic Service		No	24-67
87	Michelle	Larson	michelle@redwingchamber.com	Red Wing Area Chamber of Commerce		439 Main Street Red Wing, MN Bay Point Park MN, 55066 United States	Electronic Service		No	24-67
88	Peder	Larson	plarson@larkinhoffman.com	Larkin Hoffman Daly & Lindgren, Ltd.		8300 Norman Center Drive Suite 1000 Bloomington MN, 55437 United States	Electronic Service		No	24-67
89	Dan	Leshner	dlesher@greenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	24-67
90	Michelle	Lommel	mlommel@greenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	24-67
91	Kavita	Maini	kmaini@wi.rr.com	KM Energy Consulting, LLC		961 N Lost Woods Rd Oconomowoc WI, 53066 United States	Electronic Service		No	24-67
92	Christine	Marquis	regulatory.records@xcelenergy.com	Xcel Energy		414 Nicollet Mall MN1180-07-MCA Minneapolis MN, 55401 United States	Electronic Service		No	24-67
93	Shena	Matrious	shena.matrious@millelacsband.com	Mille Lacs Band of Ojibwe		43408 Oodena Drive Onamia MN,	Electronic Service		No	24-67

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						56349 United States				
94	April	McCormick	aprilm@grandportage.com	Grand Portage Band of Lake Superior Chippewa		PO Box 428 Grand Portage MN, 55605 United States	Electronic Service		No	24-67
95	Ronald	Meier	rmeier@mcleodcoop.com	Mcleod Cooperative Power		3515 11th St East Glencoe MN, 55336 United States	Electronic Service		No	24-67
96	Peder	Mewis	pmewis@cleangridalliance.org	Clean Grid Alliance		570 Asbury St. St. Paul MN, 55104 United States	Electronic Service		No	24-67
97	Valentina	Mgeni	valentina.mgeni@piic.org	Prairie Island Indian Community		Prairie Island Indian Community 5636 Sturgeon Lake Road Welch MN, 55089 United States	Electronic Service		No	24-67
98	Cole W.	Miller	cole.miller@shakopeedakota.org	Shakopee Mdewakanton Sioux Community		Shakopee Mdewakanton Sioux Community 2330 Sioux Trail NW Prior Lake MN, 55372 United States	Electronic Service		No	24-67
99	Stacy	Miller	stacy.miller@minneapolismn.gov	City of Minneapolis		350 S. 5th Street Room M 301 Minneapolis MN, 55415 United States	Electronic Service		No	24-67
100	David	Moeller	dmoeller@allete.com	Minnesota Power			Electronic Service		No	24-67
101	Sarah	Mooradian	sarah@curemn.org	CURE		117 South 1st Street Montevideo MN, 56265 United States	Electronic Service		No	24-67
102	Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP		33 South Sixth St Ste 4200 Minneapolis MN, 55402 United States	Electronic Service		No	24-67
103	Travis	Morrison	travis.morrison@boisforte-nsn.gov	Bois Forte Band of Chippewa		Bois Forte Tribal Government 5344 Lakeshore Drive Nett Lake MN, 55772 United States	Electronic Service		No	24-67
104	David	Morrison, Sr.	david.morrison@boisforte-nsn.gov	Bois Forte Band of Chippewa		Bois Forte Tribal Government 5344 Lakeshore Drive Nett Lake MN, 55772 United States	Electronic Service		No	24-67
105	Evan	Mulholland	emulholland@mncenter.org	Minnesota Center for Environmental Advocacy		1919 University Ave W Ste 515	Electronic Service		No	24-67

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						Saint Paul MN, 55101 United States				
106	Sonny	Myers	smyers@1854treatyauthority.org	1854 Treaty Authority		4428 Haines Rd Duluth MN, 55811-1524 United States	Electronic Service		No	24-67
107	Pouya	Najmaie	najm0001@gmail.com	Cooperative Energy Futures		3416 16th Ave S Minneapolis MN, 55407 United States	Electronic Service		No	24-67
108	Carl	Nelson	cnelson@mncee.org	Center for Energy and Environment		212 3rd Ave N Ste 560 Minneapolis MN, 55401 United States	Electronic Service		No	24-67
109	Deb	Nelson	dnelson@greenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	24-67
110	David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency		220 South Sixth Street Suite 1300 Minneapolis MN, 55402 United States	Electronic Service		No	24-67
111	Duane	Ninneman	duane@cureriver.org	Clean Up the River Environment		117 South 1st St Montevideo MN, 56265 United States	Electronic Service		No	24-67
112	Logan	O'Grady	logrady@mnseia.org	Minnesota Solar Energy Industries Association		2288 University Ave W St. Paul MN, 55114 United States	Electronic Service		No	24-67
113	Joseph	OBrien	joey.obrien@lowersioux.com			39527 Highway 1 Morton MN, 56270 United States	Electronic Service		No	24-67
114	Carol A.	Overland	overland@legalectric.org	Legalelectric - Overland Law Office		1110 West Avenue Red Wing MN, 55066 United States	Electronic Service		No	24-67
115	Gregory	Padden	gpadden@greenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	24-67
116	Jessica	Palmer Denig	jessica.palmer-denig@state.mn.us		Office of Administrative Hearings	600 Robert St N PO Box 64620 St. Paul MN, 55164 United States	Electronic Service		Yes	24-67
117	Marsha	Parlow	mparlow@greenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	24-67
118	Priti	Patel	ppatel@greenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369-4718 United States	Electronic Service		No	24-67
119	Earl	Pendleton	earl.pendleton@lowersioux.com	Lower Sioux Indian		39527 Highway 1	Electronic Service		No	24-67

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
				Community		Morton MN, 56270 United States				
120	Gordon	Pietsch	gpietsch@grenergy.com	Great River Energy		12300 Elm Creek Blvd. Maple Grove MN, 55369-4718 United States	Electronic Service		No	24-67
121	Joe	Plumer	joe.plumer@redlakenation.org	Red Lake Nation		15484 Migizi Drive Red Lake MN, 56671 United States	Electronic Service		No	24-67
122	Kevin	Pranis	kpranis@liunagroc.com	Laborers' District Council of MN and ND		81 E Little Canada Road St. Paul MN, 55117 United States	Electronic Service		No	24-67
123	Robert	Prescott	bob.prescott@lowersioux.com	Lower Sioux Indian Community		39527 Highway 1 Morton MN, 56270 United States	Electronic Service		No	24-67
124	Jody	Puddu	jody.puddu@piic.org	Prairie Island Indian Community		5636 Sturgeon Lake Rd Welch MN, 55089 United States	Electronic Service		No	24-67
125	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	24-67
126	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	24-67
127	Stephan	Roos	stephan.roos@state.mn.us		Minnesota Department of Agriculture	625 Robert St N Saint Paul MN, 55155-2538 United States	Electronic Service		No	24-67
128	Alan	Roy	alan.roy@whiteearth-nsn.gov	White Earth Nation		White Earth Tribal Headquarters 35500 Eagle View Road Ogema MN, 56569 United States	Electronic Service		No	24-67
129	Bill	Rudnicki	bill.rudnicki@shakopeedakota.org	Shakopee Mdewakanton Sioux Community		Shakopee Mdewakanton Sioux Community 2330 Sioux Trail NW Prior Lake MN, 55372 United States	Electronic Service		No	24-67
130	Nathaniel	Runke	nrunke@local49.org			611 28th St. NW Rochester MN, 55901 United States	Electronic Service		No	24-67
131	Zachary	Ruzycki	zruzycki@grenergy.com	Great River Energy		12300 Elm Creek Boulevard Maple Grove	Electronic Service		No	24-67

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						MN, 55369 United States				
132	Miranda	Sam	miranda.sam@lowersioux.com	Lower Sioux Indian Community		39527 Reservation Highway 1 PO Box 308 Morton MN, 56270 United States	Electronic Service		No	24-67
133	Adam	Savariego	adams@uppersiouxcommunity-nsn.gov	Upper Sioux Community		5722 Travers Lane PO Box 147 Granite Falls MN, 56241 United States	Electronic Service		No	24-67
134	Ronald J.	Schwartau	rschwartau@noblesce.com	Nobles Electric Cooperative		22636 U.S. Hwy. 59 Worthington MN, 56187 United States	Electronic Service		No	24-67
135	Jessie	Seim	jessie.seim@piic.org	Prairie Island Indian Community		5636 Sturgeon Lake Rd Welch MN, 55089 United States	Electronic Service		No	24-67
136	Darrell	Seki, Sr.	dseki@redlakenation.org			15484 Migizi Drive Red Lake MN, 56671 United States	Electronic Service		No	24-67
137	Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates		7400 Lyndale Ave S Ste 190 Richfield MN, 55423 United States	Electronic Service		Yes	24-67
138	Joel	Smith	jsmith@mnchippewatribe.org	Minnesota Chippewa Tribe		PO Box 217 Cass Lake MN, 56633 United States	Electronic Service		No	24-67
139	Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.		76 W Kellogg Blvd St. Paul MN, 55102 United States	Electronic Service		No	24-67
140	Nizhoni	Smith	nizhoni.smith@lowersioux.com	Lower Sioux Indian Community		PO Box 308 39527 Reservation Highway 1 Morton MN, 56270 United States	Electronic Service		No	24-67
141	Roger	Smith, Sr.	rogermsmithsr@fdlrez.com			1720 Big Lake Road Cloquet MN, 55720 United States	Electronic Service		No	24-67
142	Beth	Soholt	bsoholt@cleangridalliance.org	Clean Grid Alliance		570 Asbury Street Suite 201 St. Paul MN, 55104 United States	Electronic Service		No	24-67
143	Marie	Spry	mariespry@grandportage.com			PO Box 428 Grand Portage MN, 55605 United States	Electronic Service		No	24-67
144	Michael	Stalberger	michael.stalberger@blueearthcountymn.gov	Blue Earth County		410 S 5th Street Mankato MN, 56001 United States	Electronic Service		No	24-67

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
145	LeRoy	Staples Fairbanks III	leroy.fairbanks@llojibwe.net	Leech Lake Band of Ojibwe		190 Sailstar Drive NW Cass Lake MN, 56633 United States	Electronic Service		No	24-67
146	Byron E.	Starns	byron.starns@stinson.com	STINSON LLP		50 S 6th St Ste 2600 Minneapolis MN, 55402 United States	Electronic Service		No	24-67
147	Mark	Strohfus	mstrohfus@greenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	24-67
148	Samuel	Strong	sam.strong@redlakenation.org	Red Lake Nation		15484 Migizi Drive Red Lake MN, 56671 United States	Electronic Service		No	24-67
149	Timothy	Sullivan	tsullivan@whe.org	Wright Hennepin Coop. Electric Assn.		6800 Electric Drive PO Box 330 Rockford MN, 55373 United States	Electronic Service		No	24-67
150	David	Sunderman	daves@benco.org	BENCO (DUPLICATE)		PO Box 8 Mankato MN, 56002-0008 United States	Electronic Service		No	24-67
151	Camille	Tanhoff	kamip@uppersiouxcommunity-nsn.gov	Upper Sioux Community		5722 Travers Lane PO BOX 147 Granite Falls MN, 56241 United States	Electronic Service		No	24-67
152	Tim	Thompson	tthompson@lrec.coop	Lake Region Electric Cooperative		PO Box 643 1401 South Broadway Pelican Rapids MN, 56572 United States	Electronic Service		No	24-67
153	Geoffrey	Tolley	geoff.tolley@gmail.com			855 Stanley Road Two Harbors MN, 55616-1176 United States	Electronic Service		No	24-67
154	Caralyn	Trutna	carrie@uppersiouxcommunity-nsn.gov	Upper Sioux Community		Upper Sioux Community P.O. Box 147 Granite Falls MN, 55372 United States	Electronic Service		No	24-67
155	Jackie	Van Norman	jvannorman@greenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	24-67
156	Sam	Villella	sdvillella@gmail.com			10534 Alamo Street NE Blaine MN, 55449 United States	Electronic Service		No	24-67
157	Carla	Vita	carla.vita@state.mn.us	MN DEED		Great Northern Building 12th Floor 180 East Fifth Street St. Paul MN, 55101 United States	Electronic Service		No	24-67

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
158	Amelia	Vohs	avohs@mncenter.org	Minnesota Center for Environmental Advocacy		1919 University Avenue West Suite 515 St. Paul MN, 55104 United States	Electronic Service		No	24-67
159	Trent	Waite	twaite@grenergy.com			null null, null United States	Electronic Service		No	24-67
160	Heather	Westra	heather.westra@piic.org	Prairie Island Indian Community		5636 Sturgeon Lake Rd Welch MN, 55089 United States	Electronic Service		No	24-67
161	Steve	White	steve.white@llojibwe.net	Leech Lake Band of Ojibwe		190 Sailstar Drive NW Cass Lake MN, 56633 United States	Electronic Service		No	24-67
162	Cody	Whitebear	cody.whitebear@piic.org	Prairie Island Indian Community		5636 Sturgeon Lake Road Welch MN, 55089 United States	Electronic Service		No	24-67
163	John	Williams	jwilliams@grenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	24-67
164	Virgil	Wind	virgil.wind@millelacsband.com	Mille Lacs Band of Ojibwe		43408 Oodena Drive Onamia MN, 56359 United States	Electronic Service		No	24-67
165	Joseph	Windler	jwindler@winthrop.com	Winthrop & Weinstine		225 South Sixth Street, Suite 3500 Minneapolis MN, 55402 United States	Electronic Service		No	24-67
166	Laurie	York	laurie.york@whiteearth-nsn.gov	White Earth Reservation Business Committee		PO Box 418 White Earth MN, 56591 United States	Electronic Service		No	24-67
167	Curtis	Zaun	czaun@mNSEIA.org	MnSEIA		PO Box 8141 Saint Paul MN, 55108 United States	Electronic Service		No	24-67
168	Kurt	Zimmerman	kwz@ibew160.org	Local Union #160, IBEW		2909 Anthony Ln St Anthony Village MN, 55418-3238 United States	Electronic Service		No	24-67
169	Patrick	Zomer	pzomer@cozen.com	Cozen O'Connor		150 S. 5th Street, #1200 Minneapolis MN, 55402 United States	Electronic Service		No	24-67

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
1	Michael	Alpogianis	malpogianis@invenergy.com	Invenergy		1 South Wacker Drive Chicago IL, 60606 United States	Electronic Service		No	23-212Official
2	Gary	Ambach	gambach@slipstreaminc.org	Slipstream, Inc.		8973 SW Village Loop Chanhassen MN, 55317 United States	Electronic Service		No	23-212Official
3	Dennis	Anderson	whatelse@q.com			5295 Anderlie Lane White Bear Lake MN, 55110 United States	Electronic Service		No	23-212Official
4	Katherine	Arnold	katherine.arnold@ag.state.mn.us		Office of the Attorney General - Department of Commerce	445 Minnesota Street Suite 1400 St. Paul MN, 55101 United States	Electronic Service		No	23-212Official
5	Susan	Arntz	sarntz@mankatomn.gov	City Of Mankato		P.O. Box 3368 Mankato MN, 56002-3368 United States	Electronic Service		No	23-212Official
6	Mara	Ascheman	mara.k.ascheman@xcelenergy.com	Xcel Energy		414 Nicollet Mall Fl 5 Minneapolis MN, 55401 United States	Electronic Service		No	23-212Official
7	Ryan	Barlow	ryan.barlow@lawmoss.com	Moss & Barnett, a Professional Association		150 South Fifth St #1200 Minneapolis MN, 55402 United States	Electronic Service		No	23-212Official
8	Jessica L	Bayles	jessica.bayles@stoel.com	Stoel Rives LLP		1150 18th St NW Ste 325 Washington DC, 20036 United States	Electronic Service		No	23-212Official
9	David	Bell	david.bell@state.mn.us		Department of Health	POB 64975 St. Paul MN, 55164 United States	Electronic Service		No	23-212Official
10	David	Bender	dbender@earthjustice.org	Earthjustice		1001 G Street NW Suite 1000 Washington DC, 20001 United States	Electronic Service		No	23-212Official
11	Sasha	Bergman	sasha.bergman@state.mn.us		Public Utilities Commission	121 7th Pl E Ste 350 St. Paul MN, 55101 United States	Electronic Service		Yes	23-212Official
12	Ingrid	Bjorklund	ibjorklund@avisenlegal.com	Avisen Legal		901 S. Marquette Ave. #1675 Minneapolis MN, 55402 United States	Electronic Service		No	23-212Official
13	Matthew	Brodin	mbrodin@allete.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	23-212Official
14	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	23-212Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
15	James	Canaday	james.canaday@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	Suite 1400 445 Minnesota St. St. Paul MN, 55101 United States	Electronic Service		No	23-212Official
16	Thomas	Carlson	thomas.carlson@edf-re.com	EDF Renewable Energy		10 2nd St NE Ste. 400 Minneapolis MN, 55413 United States	Electronic Service		No	23-212Official
17	Joey	Cherney	joey.cherney@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	445 Minnesota Street STE 1800 Saint Paul MN, 55101 United States	Electronic Service		No	23-212Official
18	John	Coffman	john@johncoffman.net	AARP		871 Tuxedo Blvd. St. Louis MO, 63119-2044 United States	Electronic Service		No	23-212Official
19	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	23-212Official
20	Jean	Comstock	jean.comstock.dbcc@gmail.com	St. Paul 350		729 6th St E St. Paul MN, 55106 United States	Electronic Service		No	23-212Official
21	Water Programs	Coordinator	waterprograms.bwsr@state.mn.us		Minnesota Board of Water and Soil Resources	520 Lafayette Road N St. Paul MN, 55155 United States	Electronic Service		No	23-212Official
22	George	Crocker	gwillc@nawo.org	North American Water Office		5093 Keats Avenue Lake Elmo MN, 55042 United States	Electronic Service		No	23-212Official
23	James	Denniston	james.r.denniston@xcelenergy.com	Xcel Energy Services, Inc.		414 Nicollet Mall, 401-8 Minneapolis MN, 55401 United States	Electronic Service		No	23-212Official
24	Ian M.	Dobson	ian.m.dobson@xcelenergy.com	Xcel Energy		414 Nicollet Mall, 401-8 Minneapolis MN, 55401 United States	Electronic Service		No	23-212Official
25	Randall	Doneen	randall.doneen@state.mn.us		Department of Natural Resources	500 Lafayette Rd, PO Box 25 Saint Paul MN, 55155 United States	Electronic Service		No	23-212Official
26	Richard	Dornfeld	richard.dornfeld@ag.state.mn.us		Office of the Attorney General - Department of Commerce	Minnesota Attorney General's Office 445 Minnesota Street, Suite 1800 Saint Paul MN, 55101 United States	Electronic Service		No	23-212Official
27	J.	Drake Hamilton	hamilton@fresh-energy.org	Fresh Energy		408 St Peter St Ste 350 Saint Paul MN, 55101 United States	Electronic Service		No	23-212Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
28	Christopher	Droske	christopher.droske@minneapolismn.gov	Northern States Power Company dba Xcel Energy-Elec		661 5th Ave N Minneapolis MN, 55405 United States	Electronic Service		No	23-212Official
29	Adam	Duininck	aduininck@ncsrcc.org	North Central States Regional Council of Carpenters		700 Olive Street St. Paul MN, 55130 United States	Electronic Service		No	23-212Official
30	Brian	Edstrom	briane@cubminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota St Ste W1360 Saint Paul MN, 55101 United States	Electronic Service		No	23-212Official
31	Kate	Fairman	kate.fairman@state.mn.us		Department of Natural Resources	Box 32 500 Lafayette Rd St. Paul MN, 55155-4032 United States	Electronic Service		No	23-212Official
32	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	23-212Official
33	Annie	Felix Gerth	annie.felix-gerth@state.mn.us			Board of Water & Soil Resources 520 Lafayette Rd Saint Paul MN, 55155 United States	Electronic Service		No	23-212Official
34	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	23-212Official
35	Mike	Fiterman	mikefiterman@libertydiversified.com	Liberty Diversified International		5600 N Highway 169 Minneapolis MN, 55428-3096 United States	Electronic Service		No	23-212Official
36	Lucas	Franco	lfranco@liunagroc.com	LIUNA		81 Little Canada Rd E Little Canada MN, 55117 United States	Electronic Service		No	23-212Official
37	Todd J.	Guerrero	todd.guerrero@kutakrock.com	Kutak Rock LLP		Suite 1750 220 South Sixth Street Minneapolis MN, 55402-1425 United States	Electronic Service		No	23-212Official
38	Kim	Havey	kim.havey@minneapolismn.gov	City of Minneapolis		350 South 5th Street, Suite 315M Minneapolis MN, 55415 United States	Electronic Service		No	23-212Official
39	Philip	Hayet	phayet@jkenn.com	J. Kennedy and Associates, Inc.		570 Colonial Park Drive Suite 305 Roswell GA, 30075-3770 United States	Electronic Service		No	23-212Official
40	Adam	Heinen	aheinen@dakotaelectric.com	Dakota Electric Association		4300 220th St W Farmington	Electronic Service		No	23-212Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						MN, 55024 United States				
41	Annete	Henkel	mui@mnuutilityinvestors.org	Minnesota Utility Investors		413 Wacouta Street #230 St. Paul MN, 55101 United States	Electronic Service		No	23-212Official
42	Kristin	Henry	kristin.henry@sierraclub.org	Sierra Club		2101 Webster St Ste 1300 Oakland CA, 94612 United States	Electronic Service		No	23-212Official
43	Katherine	Hinderlie	katherine.hinderlie@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	445 Minnesota St Suite 1400 St. Paul MN, 55101-2134 United States	Electronic Service		No	23-212Official
44	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	23-212Official
45	Kari	Howe	kari.howe@state.mn.us		DEED	332 Minnesota St, #E200 1ST National Bank Bldg St. Paul MN, 55101 United States	Electronic Service		No	23-212Official
46	Dean	Hunter	dean.hunter@state.mn.us		Minnesota Department of Labor & Industry	443 Lafayette Rd N St. Paul MN, 55155-4341 United States	Electronic Service		No	23-212Official
47	Alan	Jenkins	aj@jenkinsatlaw.com	Jenkins at Law		2950 Yellowtail Ave. Marathon FL, 33050 United States	Electronic Service		No	23-212Official
48	Richard	Johnson	rick.johnson@lawmoss.com	Moss & Barnett		150 S. 5th Street Suite 1200 Minneapolis MN, 55402 United States	Electronic Service		No	23-212Official
49	Sarah	Johnson Phillips	sjphillips@stoel.com	Stoel Rives LLP		33 South Sixth Street Suite 4200 Minneapolis MN, 55402 United States	Electronic Service		No	23-212Official
50	William	Kenworthy	will@votesolar.org			1 South Dearborn St Ste 2000 Chicago IL, 60603 United States	Electronic Service		No	23-212Official
51	Samuel B.	Ketchum	sketchum@kennedy-graven.com	Kennedy & Graven, Chartered		150 S 5th St Ste 700 Minneapolis MN, 55402 United States	Electronic Service		No	23-212Official
52	Raymond	Kirsch	raymond.kirsch@state.mn.us		Department of Commerce	85 7th Place E Ste 500 St. Paul MN, 55101 United States	Electronic Service		No	23-212Official
53	Frank	Kohlasch	frank.kohlasch@state.mn.us		Minnesota Pollution Control Agency	520 Lafayette Rd N. St. Paul MN, 55155 United States	Electronic Service		No	23-212Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
54	Brian	Kolbinger	brian@beckertownship.org	Becker Township Board		PO Box 248 12165 Hancock St Becker MN, 55308 United States	Electronic Service		No	23-212Official
55	Chad	Konickson	chad.konickson@usace.army.mil	U.S.Army Corps of Engineers		332 Minnesota St. Suite E1500 Saint Paul MN, 55101 United States	Electronic Service		No	23-212Official
56	Stacy	Kotch Egstad	stacy.kotch@state.mn.us		MINNESOTA DEPARTMENT OF TRANSPORTATION	395 John Ireland Blvd. St. Paul MN, 55155 United States	Electronic Service		No	23-212Official
57	Kay	Kuhlmann	teri.swanson@ci.red-wing.mn.us	City Of Red Wing		315 West Fourth Street Red Wing MN, 55066 United States	Electronic Service		No	23-212Official
58	Brenda	Kyle	bkyle@stpaulchamber.com	St. Paul Area Chamber of Commerce		401 N Robert Street Suite 150 St Paul MN, 55101 United States	Electronic Service		No	23-212Official
59	Carmel	Laney	carmel.laney@stoel.com	Stoel Rives LLP		33 South Sixth Street Suite 4200 Minneapolis MN, 55402 United States	Electronic Service		No	23-212Official
60	Peder	Larson	plarson@larkinhoffman.com	Larkin Hoffman Daly & Lindgren, Ltd.		8300 Norman Center Drive Suite 1000 Bloomington MN, 55437 United States	Electronic Service		No	23-212Official
61	Amber	Lee	amber.lee@stoel.com	Stoel Rives LLP		33 S. 6th Street Suite 4200 Minneapolis MN, 55402 United States	Electronic Service		No	23-212Official
62	Rachel	Leonard	rachel.leonard@ci.monticello.mn.us	City of Monticello		505 Walnut St Ste 1 Monticello MN, 55362 United States	Electronic Service		No	23-212Official
63	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	23-212Official
64	Alice	Madden	alice@communitypowermn.org	Community Power		2720 E 22nd St Minneapolis MN, 55406 United States	Electronic Service		No	23-212Official
65	Kavita	Maini	kmaini@wi.rr.com	KM Energy Consulting, LLC		961 N Lost Woods Rd Oconomowoc WI, 53066 United States	Electronic Service		No	23-212Official
66	Christine	Marquis	regulatory.records@xcelenergy.com	Xcel Energy		414 Nicollet Mall MN1180-07- MCA Minneapolis MN, 55401 United States	Electronic Service		No	23-212Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
67	Dawn S	Marsh	dawn_marsh@fws.gov	U.S. Fish & Wildlife Service		Minnesota-Wisconsin Field Offices 4101 American Blvd E Bloomington MN, 55425 United States	Electronic Service		No	23-212Official
68	Emily	Marshall	emarshall@lourismarshall.com	Miller O'Brien Jensen, PA		120 S. 6th Street Suite 2400 Minneapolis MN, 55402 United States	Electronic Service		No	23-212Official
69	Katherine	Marshall	katie.marshall@lawmoss.com	Moss & Barnett		150 S 5th St Ste 1200 Minneapolis MN, 55402 United States	Electronic Service		No	23-212Official
70	Mary	Martinka	mary.a.martinka@xcelenergy.com	Xcel Energy Inc		414 Nicollet Mall 7th Floor Minneapolis MN, 55401 United States	Electronic Service		No	23-212Official
71	Gregg	Mast	gmast@cleanenergyeconomymn.org	Clean Energy Economy Minnesota		4808 10th Avenue S Minneapolis MN, 55417 United States	Electronic Service		No	23-212Official
72	Daryl	Maxwell	dmaxwell@hydro.mb.ca	Manitoba Hydro		360 Portage Ave FL 16 PO Box 815, Station Main Winnipeg MB, R3C 2P4 Canada	Electronic Service		No	23-212Official
73	Erica	McConnell	emcconnell@elpc.org	Environmental Law & Policy Center		35 E. Wacker Drive, Suite 1600 Chicago IL, 60601 United States	Electronic Service		No	23-212Official
74	Taylor	McNair	taylor@gridlab.org			668 Capp Street San Francisco CA, 94110 United States	Electronic Service		No	23-212Official
75	Melanie	Mesko Lee	melanie.lee@burnsvillemn.gov	City of Burnsville		100 Civic Center Parkway Burnsville MN, 55337-3867 United States	Electronic Service		No	23-212Official
76	Peder	Mewis	pmewis@cleangridalliance.org	Clean Grid Alliance		570 Asbury St. St. Paul MN, 55104 United States	Electronic Service		No	23-212Official
77	Stacy	Miller	stacy.miller@minneapolismn.gov	City of Minneapolis		350 S. 5th Street Room M 301 Minneapolis MN, 55415 United States	Electronic Service		No	23-212Official
78	David	Moeller	dmoeller@allete.com	Minnesota Power			Electronic Service		No	23-212Official
79	Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP		33 South Sixth St Ste 4200 Minneapolis MN, 55402 United States	Electronic Service		No	23-212Official
80	Evan	Mulholland	emulholland@mncenter.org	Minnesota Center for		1919 University Ave W Ste 515	Electronic Service		No	23-212Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
				Environmental Advocacy		Saint Paul MN, 55101 United States				
81	Alan	Muller	alan@greendel.org	Energy & Environmental Consulting		1110 West Avenue Red Wing MN, 55066 United States	Electronic Service		No	23-212Official
82	Carl	Nelson	cnelson@mncee.org	Center for Energy and Environment		212 3rd Ave N Ste 560 Minneapolis MN, 55401 United States	Electronic Service		No	23-212Official
83	David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency		220 South Sixth Street Suite 1300 Minneapolis MN, 55402 United States	Electronic Service		No	23-212Official
84	M. William	O'Brien	bobrien@mojlaw.com	Miller O'Brien Jensen, P.A.		120 S 6th St Ste 2400 Minneapolis MN, 55402 United States	Electronic Service		No	23-212Official
85	Ric	O'Connell	ric@gridlab.org	GridLab		2120 University Ave Berkeley CA, 94704 United States	Electronic Service		No	23-212Official
86	Carol A.	Overland	overland@legalelectric.org	Legalelectric - Overland Law Office		1110 West Avenue Red Wing MN, 55066 United States	Electronic Service		No	23-212Official
87	Jessica	Palmer Denig	jessica.palmer-denig@state.mn.us		Office of Administrative Hearings	600 Robert St N PO Box 64620 St. Paul MN, 55164 United States	Electronic Service		No	23-212Official
88	J.	Porter	greg.porter@nngco.com	Northern Natural Gas Company		1111 South 103rd St Omaha NE, 68124 United States	Electronic Service		No	23-212Official
89	Brian H.	Potts	brian.potts@huschblackwell.com	Husch Blackwell		33 E Main St Ste 300 Madison WI, 53703 United States	Electronic Service		No	23-212Official
90	Kevin	Pranis	kpranis@liunagroc.com	Laborers' District Council of MN and ND		81 E Little Canada Road St. Paul MN, 55117 United States	Electronic Service		No	23-212Official
91	Kurt	Rempe	krempe@nationalgridrenewables.com	National Grid Renewables Development, LLC		8400 Normandale Lake Blvd Suite 1200 Bloomington MN, 55437 United States	Electronic Service		No	23-212Official
92	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	23-212Official
93	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	23-212Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
94	Stephan	Roos	stephan.roos@state.mn.us		Minnesota Department of Agriculture	625 Robert St N Saint Paul MN, 55155-2538 United States	Electronic Service		No	23-212Official
95	Nathaniel	Runke	nrunke@local49.org			611 28th St. NW Rochester MN, 55901 United States	Electronic Service		No	23-212Official
96	Joseph L	Sathe	jsathe@kennedy-graven.com	Kennedy & Graven, Chartered		150 S 5th St Ste 700 Minneapolis MN, 55402 United States	Electronic Service		No	23-212Official
97	Richard J.	Savelkoul	rsavelkoul@martinsquires.com	Martin & Squires, PA		332 Minnesota St Ste W2750 St. Paul MN, 55101 United States	Electronic Service		No	23-212Official
98	Jeff	Schneider	jeff.schneider@ci.red-wing.mn.us	City of Red Wing		315 West 4th Street Red Wing MN, 55066 United States	Electronic Service		No	23-212Official
99	Peter	Scholtz	peter.scholtz@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	Suite 1400 445 Minnesota Street St. Paul MN, 55101-2131 United States	Electronic Service		No	23-212Official
100	Douglas	Seaton	doug.seaton@umwlc.org	Upper Midwest Law Center		8421 Wayzata Blvd Ste 300 Golden Valley MN, 55426 United States	Electronic Service		No	23-212Official
101	Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates		7400 Lyndale Ave S Ste 190 Richfield MN, 55423 United States	Electronic Service		Yes	23-212Official
102	Andrew R.	Shedlock	andrew.shedlock@kutakrock.com	Kutak Rock LLP		60 South Sixth St Ste 3400 Minneapolis MN, 55402-4018 United States	Electronic Service		No	23-212Official
103	Beth	Smith	bsmith@greatermankato.com	Greater Mankato Growth		1961 Premier Dr Ste 100 Mankato MN, 56001 United States	Electronic Service		No	23-212Official
104	Joshua	Smith	joshua.smith@sierraclub.org			85 Second St FL 2 San Francisco CA, 94105 United States	Electronic Service		No	23-212Official
105	Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.		76 W Kellogg Blvd St. Paul MN, 55102 United States	Electronic Service		No	23-212Official
106	Beth	Soholt	bsoholt@cleangridalliance.org	Clean Grid Alliance		570 Asbury Street Suite 201 St. Paul MN, 55104 United States	Electronic Service		No	23-212Official
107	Anna	Sommer	asommer@energyfuturesgroup.com	Energy Futures Group		PO Box 692 Canton NY, 13617 United States	Electronic Service		No	23-212Official

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108	Mark	Spurr	mspurr@fvbenergy.com	International District Energy Association		222 South Ninth St., Suite 825 Minneapolis MN, 55402 United States	Electronic Service		No	23-212Official
109	Sean	Stalpes	sean.stalpes@state.mn.us		Public Utilities Commission	121 E. 7th Place, Suite 350 Saint Paul MN, 55101-2147 United States	Electronic Service		No	23-212Official
110	Byron E.	Starns	byron.starns@stinson.com	STINSON LLP		50 S 6th St Ste 2600 Minneapolis MN, 55402 United States	Electronic Service		No	23-212Official
111	Jayme	Trusty	execdir@swrdc.org	SWRDC		2401 Broadway Ave #1 Slayton MN, 56172 United States	Electronic Service		No	23-212Official
112	Jen	Tyler	tyler.jennifer@epa.gov	US Environmental Protection Agency		Environmental Planning & Evaluation Unit 77 W Jackson Blvd. Mailstop B-19J Chicago IL, 60604-3590 United States	Electronic Service		No	23-212Official
113	Carla	Vita	carla.vita@state.mn.us	MN DEED		Great Northern Building 12th Floor 180 East Fifth Street St. Paul MN, 55101 United States	Electronic Service		No	23-212Official
114	Julie	Voeck	julie.voeck@nee.com	NextEra Energy Resources, LLC		700 Universe Blvd Juno Beach FL, 33408 United States	Electronic Service		No	23-212Official
115	Amelia	Vohs	avohs@mncenter.org	Minnesota Center for Environmental Advocacy		1919 University Avenue West Suite 515 St. Paul MN, 55104 United States	Electronic Service		No	23-212Official
116	Cynthia	Warzecha	cynthia.warzecha@state.mn.us	Minnesota Department of Natural Resources		500 Lafayette Road Box 25 St. Paul MN, 55155-4040 United States	Electronic Service		No	23-212Official
117	Julianna	Wei	julianna.wei@rondo.com	Rondo Energy, Inc.		1960 North Loop Alameda CA, 94502 United States	Electronic Service		No	23-212Official
118	Alan	Whipple	sa.property@state.mn.us		Minnesota Department Of Revenue	Property Tax Division 600 N. Robert Street St. Paul MN, 55146-3340 United States	Electronic Service		No	23-212Official
119	Laurie	Williams	laurie.williams@sierraclub.org	Sierra Club		Environmental Law Program 1536 Wynkoop St Ste 200 Denver CO,	Electronic Service		No	23-212Official

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						80202 United States				
120	Joseph	Windler	jwindler@winthrop.com	Winthrop & Weinstine		225 South Sixth Street, Suite 3500 Minneapolis MN, 55402 United States	Electronic Service		No	23-212Official
121	Rob	Witwer	rob.witwer@onwardenergy.com	Onward Energy Holdings, LLC		767 Third Ave 17th Floor New York NY, 10017 United States	Electronic Service		No	23-212Official
122	Jonathan	Wolfgram	jonathan.wolfgram@state.mn.us		Office of Pipeline Safety	445 Minnesota St Ste 147 Woodbury MN, 55125 United States	Electronic Service		No	23-212Official
123	Tim	Wulling	t.wulling@earthlink.net			1495 Raymond Ave. Saint Paul MN, 55108 United States	Electronic Service		No	23-212Official
124	Kurt	Zimmerman	kwz@ibew160.org	Local Union #160, IBEW		2909 Anthony Ln St Anthony Village MN, 55418-3238 United States	Electronic Service		No	23-212Official
125	Emily	Ziring	eziring@stlouispark.org	City of St. Louis Park		5005 Minnetonka Blvd St. Louis Park MN, 55416 United States	Electronic Service		No	23-212Official
126	Patrick	Zomer	pzomer@cozen.com	Cozen O'Connor		150 S. 5th Street, #1200 Minneapolis MN, 55402 United States	Electronic Service		No	23-212Official
127	David	Zoppo	david.zoppo@huschblackwell.com	American Transmission Company LLC		33 East Main Street Suite 300 Madison WI, 53703 United States	Electronic Service		No	23-212Official