



July 8, 2024

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

RE: Center for Energy and Environment and Energy CENTS Coalition's Comments in the Matter of Xcel Energy's Petition for an Automatic Bill Credit Pilot Program

Docket Number E002/M-24-173

Dear Mr. Seuffert,

Center for Energy and Environment ("CEE") and Energy CENTS Coalition ("ECC") respectfully submit these Comments to the Minnesota Public Utilities Commission ("Commission") in the matter of Xcel Energy's Petition for an Automatic Bill Credit Pilot Program ("Petition" or "Proposed Pilot Program").

On April 16, 2024 Xcel Energy (or "Company") filed its Petition for approval of a two-year pilot program to provide utility bill credits for its residential electric customers living in geographic areas within its service territory with high energy burden. The pilot program was developed collaboratively through the Equity Stakeholder Advisory Group ("ESAG"), of which CEE and ECC are participants. CEE and ECC were signatories to the Company's original Petition, indicating our support for the Proposed Pilot Program. CEE and ECC (jointly "Joint Commenters") submit the following Comments to the Commission, supporting approval of the Petition and answering questions included in the Commission's April 26, 2024 Notice of Comment Period in this docket.

Overview of the Proposed Pilot Program

Xcel Energy's Proposed Pilot Program will provide bill credits to residential customers in Census Block Groups with average electric energy burden of four percent or higher, calculated based on U.S. Census Bureau median household income data and Xcel Energy utility billing data. Xcel Energy identified 77 eligible Census Block Groups, with a total of 23,000 eligible residential customers. Customers living in these Census Block Groups will receive a monthly bill credit equal to the amount, in aggregate over 12 months, necessary to bring the average annual electric energy burden to four percent. Participants will not be required to provide income data or take any additional action to receive the bill credits. The Company states:

The objective is to reduce energy burden based on existing and known disparities, without requiring income qualification or other program enrollment documentation. The pilot would complement and amplify the benefits of existing federal, state and utility energy assistance programs and deliver much-needed support to economically struggling households in some of the poorest areas of the Company's service territory.¹

The annual estimated budget for the Proposed Pilot Program is \$5.4 million. The Company proposes to pay for the program using U.S. Department of Energy ("DOE") settlement payments that resulted from a lawsuit related to the U.S. Government's failure to establish a long-term nuclear waste repository.

Topics Open for Comment

Does the proposed pilot meet the Commission's objectives for the Equity Stakeholder Advisory Group ("ESAG")?

The Joint Commenters believe that the Proposed Pilot Program supports a key objective established by the Commission for the ESAG. Order Point 25 of the Commission's April 15, 2022 Order in Docket Number E002/RP-19-368 laid out six objectives for the stakeholder group now named ESAG. The first objective established by the Commission was to "Design for the equitable delivery of electricity services and programs for energy-burdened customers in the company's next resource plan."² The Joint Commenters believe that the "equitable delivery of electricity services" includes equity in the costs customers pay for those utility services. As such, when some customers pay significantly more as a percent of household income than others, that constitutes inequity.

By providing bill credits to pilot participants, the Proposed Pilot Program will lower electricity costs, as a percent of income, for customers living in high energy-burdened areas to be more aligned with electricity costs customers pay in other parts of the Company's service territory. In doing so, the Proposed Pilot Program will improve equity across the Company's service territory over the term of the Proposed Pilot Program. It will also inform the Company's future resource plans, and other utility program plans, by providing information and findings about how the pilot program performed. This information may be useful for informing broader, similar programs or other geographically targeted programs, such as geographically targeted energy efficiency programs.

¹ Page 1 of Xcel Energy's Petition in this docket.

² Page 39 of the Commission's April 15, 2022 Order Approving Plan with Modifications and Establishing Requirements for Future Filings in Docket Number E002/RP-19-368.

While the Joint Commenters believe this Proposed Pilot Program advances a key objective of the ESAG, we note that it is not sufficient on its own to fully meet that objective. The Proposed Pilot Program provides immediate financial relief for customers facing high energy burden, but it does not solve the underlying cause of that high energy burden (i.e., high utility costs relative to income). To address the root cause of this issue, the Company will need to take action to reduce ongoing utility costs or raise incomes for these customers, or both. Therefore, we believe that the Proposed Pilot Program should be approved and also paired with targeted investments in energy efficiency for participating customers, as well as ongoing workforce development programming that serves the communities included in the Proposed Pilot Program.

Budget

2. Should the Commission approve a pilot budget of \$5.4 million per year, or \$10.8 million over the two years of the pilot?

3. Is it appropriate for Xcel Energy (Xcel or the Company) to absorb the administrative costs of delivering the pilot within its regular cost of doing business?

4. Is it appropriate for the pilot to be funded by Department of Energy (DOE) settlement payments, which have historically been dispersed across customer classes?

The Joint Commenters find the Company's proposed budget reasonable and appropriate. Further, we find it reasonable for the Company to absorb the administrative costs of the Proposed Pilot Program within its regular cost of doing business. We expect the administrative costs of the Proposed Pilot Program to be minimal relative to the Company's overall administrative costs and to have little impact on utility rates. Finally, we find it reasonable and appropriate to fund the two-year Proposed Pilot Program with a portion of the Company's DOE settlement payment, while passing along the remaining settlement amount to all ratepayers through a Multiyear Rate Plan true-up refund or other mechanism.³

Minnesota has a long history of providing financial relief for low-income households facing high energy bills and collecting the costs of those programs through utility rates. Examples include the Gas Affordability Program,⁴ Low-Income Electric Rate Discount,⁵ and Low-Income Energy Conservation and Optimization programs.^{6,7} These programs provide critical support for Minnesota families struggling to meet basic needs. Additionally, programs that reduce low-income customers' bills result in utility system benefits related to reduced arrears, reduced costs

³ Xcel Energy noted in its Petition that the 2023 DOE settlement payment was approximately \$16.8 million, which would fully fund the estimated annual budget of the Proposed Pilot Program with approximately \$11.4 million dollars remaining.

⁴ Minnesota Statute 216B.16 Rate Change; Procedure; Hearing, Subd. 15

⁵ Minnesota Statute 216B.16 Rate Change; Procedure; Hearing, Subd. 14

⁶ Minnesota Statute 216B.241 Public Utilities; Energy Conservation and Optimization, Subd. 7.

⁷ Minnesota Statute 216B.2403 Consumer-Owned Utilities; Energy Conservation and Optimization, Subd. 5.

related to customer disconnections for non-payment, and reduced costs related to reconnections.⁸ Such programs can also provide broad societal benefits.

The Joint Commenters believe that Xcel Energy's Proposed Pilot Program will provide immediate financial relief for program participants, as well as utility system and societal benefits, which will be shared by non-participating customers. Moreover, the Proposed Pilot Program is designed to improve equity in the costs Xcel Energy customers incur for electric service, while testing an innovative program model, which may inform future utility programs. The DOE settlement payments provide a unique opportunity to fund the Proposed Pilot Program without directly increasing rates for other customers. Therefore, the Joint Commenters find it reasonable and appropriate to fully fund the Proposed Pilot Program with a portion of the DOE settlement payment. We recommend that the Commission approve the Company's budget and cost-recovery proposal as filed in the Petition.

Method

5. Is the two-year time frame for the pilot sufficient?

6. Has Xcel chosen a valid method to calculate and map energy burden?

7. Is Xcel's chosen eligibility threshold of four percent (or greater) electric energy burden at the census block group (Census Block Group)-level reasonable?

The Joint Commenters find Xcel Energy's proposed timeframe and methodology for the Proposed Pilot Program to be reasonable and appropriate at this time. We anticipate that data and findings of the Proposed Pilot Program may inform future methodological changes or indicate that a longer pilot term would be beneficial for participants or necessary for research purposes. If so, we hope that the Company, the Commission, and stakeholders will consider such factors as they become known over the course of the two-year pilot term.

Bills

8. Has Xcel chosen a valid method to calculate monthly participant bill credits?

As the Company noted in its Petition, other affordability programs – including PowerON, an Xcel Energy affordability program for which ECC is a third-party administrator – provide discounts sufficient to help low-income customers achieve a three percent energy burden, roughly equivalent to the average energy burden for non-low-income utility customers nationally.⁹ The Company indicated to ESAG stakeholders that narrowing the Proposed Pilot Program to those Census Block Groups experiencing four percent energy burden or higher would produce a more

⁸ Russell, Christopher, Brendon Baatz, Rachel Cluett, and Jennifer Amann. Recognizing the Value of Energy Efficiency's Multiple Benefits. American Council for an Energy-Efficient Economy. December 2015. Page 28.

⁹ U.S. Department of Energy. Low-Income Energy Affordability Data. [LEAD Tool | Department of Energy](#). Accessed June 20, 2024.

affordable initial pilot program. We are satisfied by that reasoning, but we hope that long-term program planning will continue to target a three percent energy burden, after the expiration of the pilot phase, as the Company has expressed an openness to doing.

As for the mechanics of the Proposed Pilot Program itself, the Company proposes to calculate the credit for each Census Block Group by determining the bill level that would constitute four percent of median income in the Census Block Group, subtracting that from the current average bill, and applying the difference as a Census Block Group-specific credit. This approach is acceptable, so long as the pilot program participants can layer assistance from other affordability programs to ensure that overall assistance is sufficient for the lowest income residents of those communities, whose needs may not be fully met by the standardized discount through the Proposed Pilot Program.

9. Is “layering” the pilot benefits on top of additional energy assistance appropriate?

The Company noted in its Petition, “The pilot objective is to reduce energy burden based on existing and known disparities, without requiring income qualification or other program enrollment documentation. Simplicity is the focus here.”¹⁰ If the program were designed to exclude customers in the Census Block Group already receiving energy assistance, it would add a layer of administrative work that runs counter to the stated goals of the Proposed Pilot Program.

Moreover, our support for the Proposed Pilot Program is contingent on it holding current utility discount program participants harmless. No one should lose access to existing affordability programs or inadvertently see their energy costs increase due to the Proposed Pilot Program. To that end, the automatic bill credit through the Proposed Pilot Program should be layered over and above any other affordability benefits or assistance.

However, the Joint Commenters are closely scrutinizing the specific mechanics of benefits layering in the Proposed Pilot Program to ensure that participants are held harmless. In its Petition, the Company stated the following:

In the event receiving the Automatic Bill Credit on top of other discounts or bill credits already received would cause a customer’s electricity bill to go below zero, the Automatic Bill Credit will be limited to what would result in a zero bill.¹¹

Under current policies, some discount programs (e.g., PowerON) require the program participant to make regular, discounted payments to remain eligible for the program. We are in

¹⁰ Pp. 1-2 of Xcel Energy’s Petition in this docket.

¹¹ Page 14 of Xcel Energy’s Petition in this docket.

conversations with the Company to determine whether a customer whose bill technically becomes zero would be excused from this requirement for regular payments.

10. Is Xcel's treatment of "over-inclusion," by including policies for opting-out and preventing negative bills, reasonable?

Targeting a discount program by Census Block Group will almost certainly result in customers who would not otherwise qualify for discount programs receiving a benefit. That approach is meant to remedy the current landscape in which some customers who are income-eligible for discount programs do not participate due to a lack of awareness of existing programs or other issues with the administrative burden of entering the program. The combination of automatically enrolling customers who are currently eligible for discount programs but not currently participating and allowing those individuals in the eligible Census Block Group to opt-out of the automatic bill credit offers a more robust approximation of truly meeting the needs of all low-income customers than does the current system.

11. If funding using DOE funds is approved, should pilot participants still be eligible to receive a share of the remaining DOE refunds?

Yes – the goal of the Proposed Pilot Program is to reduce energy burden and maintain simplicity for both customers and the utility. Participants should not be excluded from additional financial relief as a result of their participation in the Proposed Pilot Program. Where relevant, excess benefits can be directed towards paying down arrears.

Evaluation

12. Is it appropriate to engage a third-party evaluator to provide a pilot-specific Monitoring and Evaluation (M&E) plan?

- a. What degree of oversight would the Commission and/or ESAG have over the M&E process, including the timeline of work and selection of evaluation metrics and deliverables?
- b. How often should Xcel provide a progress report to the Commission and stakeholders?
- c. Staff has issued an information request in the instant docket asking Xcel to estimate the costs associated with engaging a third-party evaluator. Given Xcel's estimate, are these costs reasonable?

Xcel Energy's Petition includes hiring a third-party evaluator to design and conduct M&E to evaluate the efficacy and impact of the Proposed Pilot Program. The Company notes, "The Company has often worked with a third party, both for the enhanced credibility of the program evaluation process, and to take advantage of M&E consultants' expertise in survey design. We

propose to do the same here.”¹² The Company estimates the third-party evaluation will cost approximately \$400,000 based on its experience commissioning third-party evaluators for other pilot programs. In its response to Commission Staff’s April 26, 2024 Information Request Number Three, Xcel Energy stated, “The company will use the Request for Proposal process to contain costs, but considering the innovations being explored in this pilot, M&E needs to take a robust and thorough approach; we believe the cost estimate above is likely accurate.”¹³

Also in its response to Commission Staff’s April 26, 2024 Information Request Number Three, the Company provided information about the likely evaluation process and how ESAG members may be engaged.

This work would begin with development of an M&E plan and metrics, with research designed to measure the objectives designated in the final order through primary and secondary data collection at the appropriate points in the process. Engaging with ESAG member organizations at the conclusion of the planning stage (prior to any data collection) is likely, but we expect that the most cost-effective approach will rely on deference to the third-party evaluator’s expertise on survey design and sample development.¹⁴

First, the Joint Commenters find it appropriate for the Company to engage a third-party evaluator to design and conduct a thorough program evaluation of the Proposed Pilot Program. We agree with the Company that M&E is a best practice for pilot programs to determine whether a pilot program should be continued, expanded, modified, or otherwise. The Proposed Pilot Program will test an innovative program design that may be informative for many other utility programs, and we believe a robust evaluation is critical for understanding the impact and efficacy of the program design and intervention. Moreover, we believe that hiring a third-party provider with experience and expertise in program evaluation will be important to ensure credibility and trust in the evaluation findings.

Regarding the estimated cost of the evaluation, we find the Company’s proposed budget to be reasonable. We agree that a competitive bidding process is important to ensure a qualified evaluator is selected at an appropriate cost. We expect and recommend that the Company consider cost through the competitive bidding process and if the Company finds that a robust and rigorous evaluation can be achieved at a lower cost than the Company currently estimates, we expect and recommend that the Company do so.

¹² Page 20 of Xcel Energy’s Petition.

¹³ Xcel Energy’s April 26, 2024 Response to Information Request Number 3 from the Minnesota Department of Commerce.

¹⁴ Xcel Energy’s April 26, 2024 Response to Information Request Number 3 from the Minnesota Department of Commerce.

Finally, while the Joint Commenters agree with the Company that a qualified program evaluator will be best suited to determine survey design and sample development, we recommend that the Commission require the Company to engage with ESAG members in the development of evaluation metrics for the Proposed Pilot Program. The Company and third-party evaluator may choose additional metrics for the program evaluation, beyond those requested by the ESAG, but we believe it is important that ESAG provide input on evaluation metrics most important to ESAG members. We recommend that the Company solicit input from ESAG members on evaluation metrics through a stakeholder meeting with the Company and the third-party evaluator during the evaluation design process and before data collection begins.

13. Is it appropriate for Xcel to inform customers from ineligible Census Block Groups about the automatic bill credit pilot along with information about other energy assistance opportunities?

While the existence of the Proposed Pilot Program is a matter of public record, the Joint Commenters do not believe that it is appropriate to proactively promote the program outside of the targeted communities. The purpose of the Proposed Pilot Program is to maximize relief for existing residents of low-income communities. The unfortunate reality is that Minnesota continues to see high levels of racial and socioeconomic segregation. Consequently, geography all too often is an accurate predictor of economic wellbeing, hence the geographically-targeted design of the Proposed Pilot Program.

Nonetheless, it is a population and not a geography that the Proposed Pilot Program is attempting to target. Actively promoting the program outside of the targeted Census Block Groups would risk customer confusion or even drawing in higher income residents from other areas, seeking lower energy costs. The point of the Proposed Pilot Program should be to observe the endogenous economic impact that occurs in these communities when the automatic bill credit is provided.

14. Are there other issues or concerns related to this matter?

The Joint Commenters have identified two additional issues for Commission consideration: pilot participants with existing arrears and the opportunity to pair the Proposed Pilot Program with Xcel Energy's energy efficiency and workforce development programs.

Arrears

The roll-out of the Proposed Pilot Program is happening against the backdrop of a significant spike in disconnections across utilities and geographies, Xcel Energy included. Several of the Company's recent regulatory filings show that 2023 had the highest level of disconnections since 2014.¹⁵ In its 2023 Service Quality Report, Xcel Energy attributed the increase in disconnections

¹⁵ See generally Docket Nos. E,G999/CI-YR-2 (reporting monthly disconnection figures); Docket No. E,G999/CI-23-2, Xcel December 2023 Residential Customer Status Report (Jan. 18, 2024) (reporting 4,822 disconnections, which was the highest number of monthly disconnections since at least 2014).

to the lingering economic hardship coming out of the COVID-19 pandemic and consequently a persistently high-level of arrears among a subset of customers.¹⁶ It would be a missed opportunity if the Company were to engage in a pilot program that focuses on the financial well-being of customers in the lowest-income communities in its service territory and not place arrearage reduction at the center of its program design and ultimate evaluation.

Utility arrears can be a major cost factor for utility customers, particularly utility customers experiencing high energy burden. Customers who fall behind on utility bills are typically offered payment plans by the utility and some programs, including Xcel Energy's PowerOn program, forgive a portion of a customer's arrears if the customer adheres to a negotiated payment plan and schedule. The Joint Commenters believe it is important that the Company develop and offer a forgiveness process and opportunity, similar to that offered in the PowerOn program, for customers participating in the Proposed Pilot Program who have existing arrears.¹⁷

Data and findings of the Proposed Pilot Program may be unclear or misleading for customers who are attempting to pay down arrears over the course of the Proposed Pilot Program. Energy burden includes costs customers pay toward previous utility debts, not just the costs customers pay toward their most recent utility bill. We fear that the Proposed Pilot Program bill credits will be less impactful for customers with arrears, as those customers are both attempting to pay current utility bills and previous utility debts. Providing a "clean slate" for participating customers would help to ensure that pilot program impacts on customers' energy burden and ability to make utility payments over time are clear and identifiable.

We ask that the Company respond to these Comments in its Reply Comments in this docket with the total amount of arrears currently associated with the eligible Census Block Groups, as well as a proposal and budget for arrear forgiveness for program participants. Any efforts to lower arrears will not just provide relief to the customers who owe them; they will also help to reduce a significant liability on the Company's balance sheet and lower the potential for bad debt, the cost of which would be borne by all ratepayers.

Complementary Energy Efficiency and Workforce Development Programs

In its Petition, the Company stated:

ESAG urged the Company to approach energy burden holistically by providing short-term bill relief (this proposed pilot), increasing access to energy efficiency to reduce long-term energy costs, and increasing incomes by providing pathways into well-paying energy

¹⁶ *In the Matter of Northern States Power Co. d/b/a Xcel Energy's 2023 Annual Safety, Reliability, and Service Quality Report*, Docket No. E-002/M-24-27, Xcel 2023 Annual Report and Petition at 8 (Apr. 1, 2024)

¹⁷ In the PowerON program, Xcel applies a cost-share for both arrearage payments and the current month's bill for program participants with the goal of reaching a cumulative "amount due" that is 3% of the participant's income.

careers. This pilot is only the first step in that holistic approach. We hope to bring forward additional efforts to increase energy efficiency program participation in high energy burden areas, and we continue to expand efforts to diversify our workforce, increase procurement from diverse suppliers, and create pathways into energy careers.¹⁸

The Joint Commenters stress the importance of pairing the Proposed Pilot Program with Xcel Energy's existing or additional energy efficiency and workforce development programs, targeted to customers living in the eligible Census Block Groups. The Proposed Pilot Program will provide immediate financial relief for participants, but it does nothing to address the underlying and ongoing causes of high energy burden. Therefore, it is essential that the Company pair the Proposed Pilot Program with programming to implement energy efficiency improvements in participating customers' homes and recruit interested participants for one of Xcel Energy's workforce development programs from eligible Census Block Groups. The Joint Commenters request that the Company respond to these Comment in its Reply Comments with a general timeline and plan for targeting and implementing energy efficiency improvements in participating customers' homes and recruiting participants for its workforce development programs.

Please contact Audrey Partridge at apartridge@mncee.org or George Shardlow at george@energycents.org with any questions.

Sincerely,

/s/ Audrey Partridge
Director of Regulatory Policy
Center for Energy and Environment

/s/ George Shardlow
Executive Director
Energy CENTS Coalition

¹⁸ Page 5 of Xcel Energy's Petition.

AFFIDAVIT OF SERVICE

DOCKET NUMBER E002/M-24-173

I, Audrey Partridge, herby certify that on this 8th day of July 2024, I served *Center for Energy and Environment and Energy CENTS Coalition's Comments in the Matter of Xcel Energy's Petition for an Automatic Bill Credit Pilot Program* in Docket Number G002/M-24-173 on the following persons on the attached Service Lists by:

X placing such filing in envelopes, properly addressed, and depositing the same in the Post Office at the City of Minneapolis, for delivery by the United States Post Office as directed by said envelopes.

X electronic filing

/s/ Audrey Partridge
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[illegible]

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John	Farrell	jfarrell@ilsr.org	Institute for Local Self-Reliance	2720 E. 22nd St Institute for Local Self-Reliance Minneapolis, MN 55406	Electronic Service	No	OFF_SL_24-173_M-24-173
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Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 551012198	Electronic Service	No	OFF_SL_24-173_M-24-173

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Lucas	Franco	lfranco@liunagroc.com	LIUNA	81 Little Canada Rd E Little Canada, MN 55117	Electronic Service	No	OFF_SL_24-173_M-24-173
Nathan	Franzen	nathan@nationalgridrenewables.com	Geronimo Energy, LLC	8400 Normandale Lake Blvd Ste 1200 Bloomington, MN 55437	Electronic Service	No	OFF_SL_24-173_M-24-173
Daryll	Fuentes	energy@usg.com	USG Corporation	550 W Adams St Chicago, IL 60661	Electronic Service	No	OFF_SL_24-173_M-24-173
Hal	Galvin	halgalvin@comcast.net	Provectus Energy Development llc	1936 Kenwood Parkway Minneapolis, MN 55405	Electronic Service	No	OFF_SL_24-173_M-24-173
James	Garness	james.r.garness@xcelenergy.com		N/A	Electronic Service	No	OFF_SL_24-173_M-24-173
Edward	Garvey	garveyed@aol.com	Residence	32 Lawton St Saint Paul, MN 55102	Electronic Service	No	OFF_SL_24-173_M-24-173
Edward	Garvey	edward.garvey@AESLconsulting.com	AESL Consulting	32 Lawton St Saint Paul, MN 55102-2617	Electronic Service	No	OFF_SL_24-173_M-24-173
Allen	Gleckner	gleckner@fresh-energy.org	Fresh Energy	408 St. Peter Street Ste 350 Saint Paul, MN 55102	Electronic Service	No	OFF_SL_24-173_M-24-173
Jenny	Glumack	jenny@mrea.org	Minnesota Rural Electric Association	11640 73rd Ave N Maple Grove, MN 55369	Electronic Service	No	OFF_SL_24-173_M-24-173

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Todd J.	Guerrero	todd.guerrero@kutakrock.com	Kutak Rock LLP	Suite 1750 220 South Sixth Street Minneapolis, MN 554021425	Electronic Service	No	OFF_SL_24-173_M-24-173
Shubha	Harris	Shubha.M.Harris@xcelenergy.com	Xcel Energy	414 Nicollet Mall, 401 - FL 8 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_24-173_M-24-173
Kim	Havey	kim.havey@minneapolismn.gov	City of Minneapolis	350 South 5th Street, Suite 315M Minneapolis, MN 55415	Electronic Service	No	OFF_SL_24-173_M-24-173
Philip	Hayet	phayet@jkenn.com	J. Kennedy and Associates, Inc.	570 Colonial Park Drive Suite 305 Roswell, GA 30075-3770	Electronic Service	No	OFF_SL_24-173_M-24-173
Todd	Headlee	theadlee@dvigridsolutions.com	Dominion Voltage, Inc.	701 E. Cary Street Richmond, VA 23219	Electronic Service	No	OFF_SL_24-173_M-24-173
Adam	Heinen	aheinen@dakotaelectric.com	Dakota Electric Association	4300 220th St W Farmington, MN 55024	Electronic Service	No	OFF_SL_24-173_M-24-173
Jared	Hendricks	jared.hendricks@owatonnautilities.com	Owatonna Municipal Public Utilities	PO Box 800 208 S Walnut Ave Owatonna, MN 55060-2940	Electronic Service	No	OFF_SL_24-173_M-24-173
Annete	Henkel	mui@mutilityinvestors.org	Minnesota Utility Investors	413 Wacouta Street #230 St. Paul, MN 55101	Electronic Service	No	OFF_SL_24-173_M-24-173
Sandra	Henry	Sandra.Henry@elevatenp.org	Elevate	322 S Green St Ste 300 Chicago, IL 60607	Electronic Service	No	OFF_SL_24-173_M-24-173

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Kristin	Henry	kristin.henry@sierraclub.org	Sierra Club	2101 Webster St Ste 1300 Oakland, CA 94612	Electronic Service	No	OFF_SL_24-173_M-24-173
Corey	Hintz	chintz@dakotaelectric.com	Dakota Electric Association	4300 220th Street Farmington, MN 550249583	Electronic Service	No	OFF_SL_24-173_M-24-173
Joe	Hoffman	ja.hoffman@smmpa.org	SMMPA	500 First Ave SW Rochester, MN 55902-3303	Electronic Service	No	OFF_SL_24-173_M-24-173
Michael	Hoppe	lu23@ibew23.org	Local Union 23, I.B.E.W.	445 Etna Street Ste. 61 St. Paul, MN 55106	Electronic Service	No	OFF_SL_24-173_M-24-173
MJ	Horner	mj.horner@xcelenergy.com		N/A	Electronic Service	No	OFF_SL_24-173_M-24-173
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Geoffrey	Inge	ginge@regintl.com	Regulatory Intelligence LLC	PO Box 270636 Superior, CO 80027-9998	Electronic Service	No	OFF_SL_24-173_M-24-173
Travis	Jacobson	travis.jacobson@mdu.com	Great Plains Natural Gas Company	400 N 4th St Bismarck, ND 58501	Electronic Service	No	OFF_SL_24-173_M-24-173
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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John S.	Jaffray	jjaffray@jjrpower.com	JJR Power	350 Highway 7 Suite 236 Excelsior, MN 55331	Electronic Service	No	OFF_SL_24-173_M-24-173
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Michael	Kampmeyer	mkampmeyer@a-e-group.com	AEG Group, LLC	260 Salem Church Road Sunfish Lake, MN 55118	Electronic Service	No	OFF_SL_24-173_M-24-173
Nick	Kaneski	nick.kaneski@enbridge.com	Enbridge Energy Company, Inc.	11 East Superior St Ste 125 Duluth, MN 55802	Electronic Service	No	OFF_SL_24-173_M-24-173

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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William D	Kenworthy	will@votesolar.org	Vote Solar	332 S Michigan Ave FL 9 Chicago, IL 60604	Electronic Service	No	OFF_SL_24-173_M-24-173
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Brian	Krambeer	bkrambeer@mienergy.coop	MiEnergy Cooperative	PO Box 626 31110 Cooperative Way Rushford, MN 55971	Electronic Service	No	OFF_SL_24-173_M-24-173
Michael	Krause	michaelkrause61@yahoo.com	Kandiyo Consulting, LLC	1200 Plymouth Avenue Minneapolis, MN 55411	Electronic Service	No	OFF_SL_24-173_M-24-173
Michael	Krikava	mkrikava@taftlaw.com	Taft Stettinius & Hollister LLP	2200 IDS Center 80 S 8th St Minneapolis, MN 55402	Electronic Service	No	OFF_SL_24-173_M-24-173
Kay	Kuhlmann	Teri.Swanson@ci.red-wing.mn.us	City Of Red Wing	315 West Fourth Street Red Wing, MN 55066	Electronic Service	No	OFF_SL_24-173_M-24-173

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Dean	Leischow	dean@sunrisenrg.com	Sunrise Energy Ventures	315 Manitoba Ave Ste 200 Wayzata, MN 55391	Electronic Service	No	OFF_SL_24-173_M-24-173
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Jason	Loos	jason.loos@centerpointenergy.com	CenterPoint Energy Resources Corp.	505 Nicollet Mall 3rd Floor Minneapolis, MN 55402	Electronic Service	No	OFF_SL_24-173_M-24-173
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Kavita	Maini	kmairi@wi.rr.com	KM Energy Consulting, LLC	961 N Lost Woods Rd Oconomowoc, WI 53066	Electronic Service	No	OFF_SL_24-173_M-24-173
Emily	Marshall	emarshall@mojlaw.com	Miller O'Brien Jensen, PA	120 S. 6th Street Suite 2400 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_24-173_M-24-173
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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	OFF_SL_24-173_M-24-173

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Joseph	Meyer	joseph.meyer@ag.state.mn.us	Office of the Attorney General-RUD	Bremer Tower, Suite 1400 445 Minnesota Street St Paul, MN 55101-2131	Electronic Service	No	OFF_SL_24-173_M-24-173
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Dalene	Monsebroten	dalene.monsebroten@nmpagency.com	Northern Municipal Power Agency	123 2nd St W Thief River Falls, MN 56701	Electronic Service	No	OFF_SL_24-173_M-24-173
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Evan	Mulholland	emulholland@mncenter.org	Minnesota Center for Environmental Advocacy	1919 University Ave W Ste 515 Saint Paul, MN 55101	Electronic Service	No	OFF_SL_24-173_M-24-173

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Samantha	Norris	samanthanorris@alliantenergy.com	Interstate Power and Light Company	200 1st Street SE PO Box 351 Cedar Rapids, IA 524060351	Electronic Service	No	OFF_SL_24-173_M-24-173
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Matthew	Olsen	molsen@otpc.com	Otter Tail Power Company	215 South Cascade Street Fergus Falls, MN 56537	Electronic Service	No	OFF_SL_24-173_M-24-173
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Carol A.	Overland	overland@legalelectric.org	Legalelectric - Overland Law Office	1110 West Avenue Red Wing, MN 55066	Electronic Service	No	OFF_SL_24-173_M-24-173
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Greg	Palmer	gpalmer@greatermngas.com	Greater Minnesota Gas, Inc. & Greater MN Transmission, LLC	1900 Cardinal Ln PO Box 798 Faribault, MN 55021	Electronic Service	No	OFF_SL_24-173_M-24-173
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Kenneth	Rance	krance@sabathani.org	Sabathani Community Center	310 East 38th St Rm #120 Minneapolis, MN 55409	Electronic Service	No	OFF_SL_24-173_M-24-173

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Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_24-173_M-24-173
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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