

August 11, 2025

Mike Bull
Interim Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, Minnesota 55101-2147

RE: Comments of the Minnesota Department of Commerce
Docket Nos. E002/GR-21-630; G002/GR-21-678; G002/GR-23-413; E002/GR-10-971; E002/M-21-815; E002/M-22-489; E,G002/M-23-468; E,G002/M-24-221; E,G002/M-25-277.

Dear Mr. Bull:

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

*Xcel Energy's 2024 Annual Report of Rate Case Approved True-up
Mechanisms and Proposed Electric Refund and Gas Deferral Plans.*

The Petition was filed by Northern States Power Company, doing business as Xcel Energy (Xcel or the Company) on July 1, 2025.

The Department recommends the Minnesota Public Utilities Commission (Commission) **accept** Xcel Energy's 2024 Annual True-Up Report and Combined Refund/Deferral Plans as compliant with the Commission's Orders.

The Department recommends the Commission **approve** Xcel's proposed Combined Residential Electric Refund Plan and **approve** Xcel's proposed 2024 Combined Gas Customer Deferral Plan.

The Department is available to answer any questions the Commission may have.

Sincerely,

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

CN/ad
Attachment



Before the Minnesota Public Utilities Commission

Comments of the Minnesota Department of Commerce

Docket Nos. E002/GR-21-630; G002/GR-21-678; G002/GR-23-413; E002/GR-10-971; E002/M-21-815; E002/M-22-489; E,G002/M-23-468; E,G002/M-24-221; E,G002/M-25-277.

I. INTRODUCTION

On July 1, 2025, Xcel filed its 2024 Annual True-Up Report and Proposed Refund/Deferral Plans in the current Petition¹. This filing was made pursuant to multiple Commission Orders, including the July 17, 2023 Order in Docket E002/GR-21-630 (which established electric true-up mechanisms for property tax, incentive compensation, capital investments, and net operating loss),² the March 5, 2025 Order in Docket G002/GR-23-413 (which established natural gas true-up mechanisms for property tax, incentive compensation, and credit card fee waivers),³ and the November 26, 2024 Order in Docket Nos. E,G002/M-23-468 and E,G002/M-24-221, among others, which directed Xcel to consolidate future annual true-up reports into a single comprehensive filing each July 1.⁴ This 2024 report is the first consolidated filing, combining what were previously separate annual compliance filings into a single docket.

In the current Petition, Xcel detailed the results of each approved true-up mechanism for the 2024 calendar year, specifically:

- The Electric Utility Property Tax true-up, comparing actual property tax expenses for 2024 to the baseline amounts included in 2024 electric base rates.
- The Natural Gas Utility Property Tax true-up, comparing actual 2024 gas property tax expenses to the baseline in gas base rates.
- The Annual Incentive Compensation Plan (AIP) true-ups for both electric and natural gas, measuring actual incentive payouts against the amounts recovered in base rates.
- The Electric Capital Expenditure true-up, comparing actual 2024 capital-related revenue requirements to those assumed in base rates (one-way refund mechanism).
- The Net Operating Loss (NOL) Deferred Tax Asset true-up for the electric utility under the established NOL agreement tracks differences in deferred tax asset levels and the revenue requirement effect associated with the utilization of deferred tax benefits.

¹ In the Matter of the Petition of Xcel Energy's 2024 Annual Report of Rate Case Approved True-up Mechanisms and Proposed Electric Refund and Gas Deferral Plans, Xcel Energy, July 1, 2025, Docket No. E,G-002/M-25-277, (eDocket) [20257-220564-01](#), (hereinafter "Petition").

² In the Matter of the Application of Northern States Power Company, dba Xcel Energy, for Authority to Increase Rates for Electric Service in the State of Minnesota, FINDINGS OF FACT, CONCLUSIONS, AND ORDER, Minnesota Public Utilities Commission, July 17, 2023, Docket No. E002/GR-21-630, (eDocket) [20237-197559-01](#) (hereinafter "July 2023 Order")

³ In the Matter of the Application of Northern States Power Company, d/b/a Xcel Energy, for Authority to Increase Rates for Natural Gas Service in Minnesota, FINDINGS OF FACT, CONCLUSIONS, AND ORDER, Minnesota Public Utilities Commission, March 5, 2025, Docket No. E002/GR-23-413, (eDocket) [20253-216076-01](#) (hereinafter "March 2025 Order")

⁴ November 26, 2024 [Order, Point 17](#) in Docket Nos. E002/GR-10-971, E002/GR-21- 630, G002/GR-21-678, E002/M-21-815, E002/M-22-489, E,G002/M-23-468, and E,G002/M-24-221.

Docket Nos. E002/GR-21-630; G002/GR-21-678; G002/GR-23-413; E002/GR-10-971; E002/M-21-815; E002/M-22-489; E,G002/M-23-468; E,G002/M-24-221; E,G002/M-25-277.

Analyst(s) assigned: Cuong Ngo

- The Residential Credit Card Fees Waiver true-up for natural gas, tracking the difference between forecast and actual credit card fee costs that are incurred by the Company.
- The U.S. Department of Energy (DOE) Settlement Payment #16 – which is not technically an approved mechanism, but consistent with past practices, Xcel intends to include any refundable DOE settlement amount in the overall customer credit.

The current Petition also includes a Combined Electric Customer Refund Plan and a Combined Natural Gas Customer Deferral Plan summarizing how the various true-up results will be returned to or deferred from customers. The electric plan proposes a one-time bill credit to refund net over-recoveries (as shown in **Table 1**), while the gas plan proposes to defer the net under-recovery (as shown in **Table 2**). Additionally, Xcel provided a proposed customer bill message to accompany the electric refund.

Table 1: Proposed 2024 Combined Residential Electric Customer Refund Summary⁵

Refund Item	Refund Amount*	Allocation to Class Methodology	Interest Rate ⁶	Avg. Customer Refund
Property Tax	\$18,345,096	2024 Property Tax Allocation	Average Monthly Prime (7.5%)	\$6.96
AIP	\$6,517,795	2024 Ordered Revenue Allocation	Average Monthly Prime (7.5%)	\$2.12
Cap True-Up	\$0	2024 Rate Base Allocation	N/A	\$0.00
NOL	\$2,213,328	2024 Rate Base Allocation	Average Monthly Prime (7.5%)	\$0.81
DOE Payment ⁷	TBD	2024 Nuclear Plant Stratification and Capacity & Energy	TBD	TBD
Total	\$27,076,219			\$9.89

Table 2: Proposed Combined Residential Gas Customer Deferral Summary⁸

Refund Item	Refund/(Deferral) Amount*	Allocation to Class Methodology	Int. Rate	Avg. Refund/(Deferral)
Property Tax	\$(2,932,415)	2024 Property Tax Allocation	N/A	\$(3.60)
AIP	\$94,656	2024 Revenue Allocation	N/A	\$0.13
Credit Card Fees	\$1,388,973	100% Residential	N/A	\$3.03
Carryover Deferral	\$(167,822)	100% Transportation	N/A	N/A
Total	(\$1,616,608)			(\$0.44)

*Excluding Interest

⁵ Petition, Page 13 and Attachments O.

⁶ The Commission's April 17, 2024 [Order](#) in Docket Nos. E,G002/GR-23-468 et al; Xcel was required to use prime interest rate on 2022 property tax, annual incentive compensation, capital true-up, and net operating loss refunds.

⁷ If DOE Settlement Payment #16 details are available at the time of refund, Xcel will update the proposed refund to include it.

⁸ Petition, Page 15 and Attachments P.

II. PROCEDURAL BACKGROUND

November 26, 2024	The Commission issued an Order approving Xcel Energy's 2023 Annual Report of Rate Case Approved True-up Mechanisms and Proposed Electric Refund and Gas Deferral Plans. ⁹
July 1, 2025	Xcel filed the current Petition requesting approval of Xcel Energy's 2024 Annual Report of Rate Case Approved True-up Mechanisms and Proposed Electric Refund and Gas Deferral Plans.

III. DEPARTMENT ANALYSIS

The Department's review of the Petition focused on: (1) ensuring that the proposed refund and deferral mechanisms are in compliance with applicable Commission Orders and prior practices; and (2) assessing the reasonableness of each true-up calculation. In the following sections, the Department provides a detailed discussion of each component.

A. XCEL'S PROPOSED 2024 COMBINED RESIDENTIAL ELECTRIC CUSTOMER REFUND PLAN

A.1. 2024 Electric Property Tax True-Up

The Commission's July 17, 2023 Order in Xcel's electric rate case (Docket E002/GR-21-630) set a baseline level of property tax expense in rates and approved a true-up mechanism for the multiyear rate plan period.¹⁰ Xcel's 2024 actual property tax expenses (for its total NSP-Minnesota system) were allocated to the Minnesota electric jurisdiction and then compared to the amount built into 2024 rates, after removing taxes recovered through dedicated rider charges. As detailed in the Petition, the result was that actual electric property taxes for Minnesota electric jurisdiction were \$18.345 million less than the amount in base rates.¹¹ Thus, customers were over-collected by this amount in 2024 and are due a refund. The Department verified that Attachment B of the Company's report shows the rate-case baseline (from the 2021 rate case test year) versus actual 2024 taxes, and the \$18.345 million refund is correctly calculated.

The Company proposes to refund the \$18.345 million to electric customers, with interest, via a one-time credit. The allocation of the refund to customer classes will use the 2024 property tax expense allocation factors. The Department finds this allocation method appropriate, as it returns the over-collected property taxes to classes in proportion to how those costs were originally collected. The

⁹ In the Matter of Xcel Energy's Petition for Approval of 2023 Annual Incentive Plan True-Up Report, Minnesota Public Utilities Commission, Order, November 26, 2024, Docket No. E,G002/M-24-221, (eDocket) [202411-212456-01](#) (hereinafter "November 2024 Order")

¹⁰ The July 2023 Order, Points 85, 86, and 118.

¹¹ Petition, Attachment B, Page 1.

Docket Nos. E002/GR-21-630; G002/GR-21-678; G002/GR-23-413; E002/GR-10-971; E002/M-21-815; E002/M-22-489; E,G002/M-23-468; E,G002/M-24-221; E,G002/M-25-277.

Analyst(s) assigned: Cuong Ngo

Company plans to accrue interest at the average prime rate from July 2, 2025, until the refund is issued. This complies with the Commission’s directive that the prime rate be used for true-up refunds.¹² **Table 3** below summarizes the Company’s estimated property tax electric customer refunds, including an interest amount of \$287,916, based on the assumed prime cost of debt from July to September 2025, at an annual rate of 7.5 percent.

Table 3: MN Electric Jurisdiction Property Tax Expenses¹³

Customer Class	Prop Tax Allocator (\$000)	Refund Allocator %	Refund Allocation \$	Est. Avg. Customers	Avg. Cust. Refund
Electric Customer Class, Rate Base Allocator & Est. Refunds Using Prime Debt Rate					
Residential	\$101,254	45.75%	\$8,524,942	1,224,370	\$6.96
Comm Non-Demand	\$7,177	3.24%	\$604,228	87,224	\$6.93
C&I Demand	\$110,557	49.96%	\$9,308,203	50,460	\$184.47
Lighting	\$2,324	1.05%	\$195,638	28,1778	\$6.94
Total	\$212,312	100.00%	\$18,633,012	1,390,252	

Based on our review, the electric property tax true-up appears reasonable and in accordance with established procedures. Therefore, the Department recommends the Commission approve Xcel’s 2024 property tax true-up of \$18,345,096, excluding interest, or \$18,633,012, including interest from July through September 2025.

A.2. 2024 Annual Incentive Plan Compensation True-Up – Electric

In the July 2023 Order, the Commission imposed specific conditions on Xcel’s recovery of AIP compensation. The order required Xcel to cap its recovery of annual incentive plan compensation expense at 15 percent of individual base pay and 100 percent of the target payout, cap its cost recovery on the top ten highest-paid officers and employees salaries to \$1.5 million in total, excluded recovery on the annual incentive plan compensation of the top ten highest-paid officers and employees, and also required the Company to provide a calculation of the Minnesota jurisdictional top ten adjustments in future annual incentive compensation filings. The Commission approved a Minnesota jurisdictional annual incentive plan compensation expense recovery amount of \$24.324 million for the 2024 Multi-Year Rate Plan (MYRP). Xcel was also required to file annual compliance reports detailing the operation of its incentive plan under these caps, and to refund any amounts collected in rates but not actually paid or not eligible for recovery.¹⁴

¹² November 2024 Order, Point 4.

¹³ Petition, Attachment O, Page 2 and 3

¹⁴ The July 2023 Order, Points 4 to 10.

For 2024, the current Petition indicates that, after applying the caps and exclusions, the recoverable AIP expense for the electric utility was \$15.397 million, versus \$21.915 million¹⁵ included in base rates, and as a result, the over-collection amount of \$6.518 million will be refunded to customers.

The Department reviewed Xcel’s Attachments C, D, E, and F, which detail the top ten executive incentive exclusion and provide a summary of incentive compensation paid. We found that Xcel correctly removed the amounts over 15 percent cap of individual base pay and the additional AIP payouts for its top ten highest-paid. The Company provided a calculation of the Minnesota jurisdictional top ten exclusion amount, as required, and this was reflected in the determination of recoverable costs. Regarding the electric AIP refund of \$6.518 million, Xcel plans to include this amount (with interest) in the combined electric refund credit to be issued to customers. **Table 4** below summarizes the Company’s estimated AIP electric customer refunds, including an interest amount of \$102,293, based on the assumed prime cost of debt from July to September, 2025, at an annual rate of 7.5 percent.

Table 4: MN Electric AIP Refund for 2024¹⁶

Customer Class	2024 Order Revenue (\$000)	Revenue Refund Allocator %	Refund Allocation \$	Est. Avg. Customers	Avg. Cust. Refund
Electric Customer Class, Rate Base Allocator & Est. Refunds Using Prime Debt Rate					
Residential	\$1,389,685	39.28%	\$2,600,371	1,224,370	\$2.12
Comm Non-Demand	\$117,104	3.31%	\$219,125	87,224	\$2.51
C&I Demand	\$2,000,679	56.55%	\$3,743,660	50,460	\$74.19
Lighting	\$30,426	0.86%	\$56,933	28,1778	\$2.02
Total	\$3,537,894	100.00%	\$6,620,089	1,390,252	

Based on our review, Xcel’s electric AIP true-up for 2024 is compliant with the Commission’s incentive compensation recovery requirements, and results in a refund that appropriately returns over-collected amounts to customers. The Department recommends approval of the electric AIP refund in the amount of \$6,517,795, excluding interest, or \$6,620,089, including interest from July through September 2025.

A.3. 2024 Electric Capital Expenditure True-Up

Xcel’s electric capital true-up mechanism was established in the 2021 rate case as a one-way refund true-up: if actual capital-related revenue requirements for a given year of the MYRP are less than those embedded in rates, the difference is refunded to customers; if actuals are higher, the Company absorbs the variance. For 2024, as noted, Xcel’s actual capital additions and related revenue requirements exceeded the rate case levels. The Company reports that actual 2024 capital additions

¹⁵ Consistent with prior compliance filings, the baseline comparison for the Minnesota Electric jurisdiction AIP is net of Interchange billings to NSP-Wisconsin. Production, Transmission, and Regional Market AIP expenses are subject to a revenue offset through the Interchange Agreement.

¹⁶ Petition, Attachment O, Page 4 and 5.

were about \$432 million (42.8%) higher than forecast, and the resulting revenue requirement was \$30.4 million (2.0%) higher than authorized. As a result, no capital true-up refund is due for 2024.

Table 5: 2024 Capital Additions and Revenue Requirements Variance Summary (\$ millions)¹⁷

	Rate Case ¹⁸	Actuals	Difference	Percent
Capital Additions				
2024 ¹⁹	\$1,010.4	\$1,442.3	\$423.0	42.8%
2023	\$1,322.4	\$1,497.3	\$174.9	13.2%
2022	\$1,082.9	\$971.7	(\$111.2)	-10.3%
Rate Base				
2024	\$10,761.7	\$11,234.4	\$472.7	4.4%
2023	\$8,531.5	\$8,600.0	\$69.2	0.8%
2022	\$8,004.1	\$7,968.5	(\$35.6)	-0.4%
Depreciation				
2024	\$801.6	\$816.6	(\$15.0)	1.9%
2023	\$657.3	\$643.3	(\$14.0)	-2.1%
2022	\$677.8	\$663.1	(\$14.7)	-2.2%
Revenue Requirements				
2024	\$1,487.0	\$1,517.4	\$30.4	2.0%
2023	\$1,159.5	\$1,138.3	(\$21.2)	-1.8%
2022	\$1,121.2	\$1,107.7	(\$13.5)	-1.2%

The Department reviewed Xcel's supporting schedules (Attachments G, H, I), which detail the calculation of the actual revenue requirement. Xcel provided explanations for major project variances and noted that increased construction work in progress (CWIP), net plant in service, and depreciation drove the higher revenue requirement, partially offset by higher allowance for funds used during construction. These details provide context but do not affect rates at this time because of the one-way nature of the true-up.

Since the Company met its obligation by filing the annual capital compliance report, and since the outcome is that no customer refund is needed, the Department recommends the Commission acknowledge the 2024 capital true-up report and find that Xcel has complied with the capital true-up requirements for the year.

A.4. Regulatory treatment of Net Operating Loss (NOL) Related Deferred Tax Asset (DTA).

The treatment of NOL carryforward-related deferred taxes for Xcel's electric utility is governed by a long-standing agreement first approved by the Commission in Docket E002/GR-10-971. The NOL

¹⁷ Petition, Page 5

¹⁸ Final Rates Compliance Filing in Docket No. E002/GR-21-630, Schedule 9B. October 17, 2023, (eDocket) [202310-199663-02](#)

¹⁹ Total NSPM excluding riders, gas, and ND/SD electric distribution projects.

Agreement requires Xcel to annually report the balances and utilization of the NOL/DTA and to true up the revenue requirement impact of any differences from rate case projections.²⁰

For 2024, Xcel's report indicates that the actual increase in revenue requirement due to NOL was \$5.900 million, whereas the amount forecasted in final rates for 2024 was \$8.114 million. Because the actual increase was lower, customers paid for more in rates than what actually occurred, creating an over-collection in the amount of \$2.213 million, which Xcel proposes to refund to electric customers.

The Department reviewed the adjustments that Xcel made to the 2024 DTA and resulting NOL Refund. The Company adjusted the 2024 NOL Annual Report for the Prior Return adjustments. These adjustments corrected an overstatement of the DTA in the rate case compared to actual DTA in the NOL report, as a result of the Company's ability to monetize production tax credits (PTCs) earned in 2024, which results in a refund. Xcel shows these corrections on Attachments L and M of the Petition and provides a summary of the 2024 NOL Refund on page 10 of the Petition as shown in **Table 6** below.

Table 6: 2023 Net Operating Loss Refund (excluding interest)

	NOL Report (1)	Adj. Final Rates (2)	Refund (3) = (1)-(2)
Revenue Requirement Increase	\$5,900,324	\$8,113,652	(\$2,213,328)

The Company proposed to allocate the \$2.248 million NOL refund, including \$34,737 in interest, to customer classes based on the rate base. Residential customers will receive an average credit of about \$0.81 from this NOL refund. **Table 7** below summarizes Xcel's estimated NOL refunds at the U.S prime interest rate for July to September 2025 at 7.5 percent.

Table 7: NOL Electric Customer Class Allocations and Rate Base Allocator²¹

Customer Class	2024 Rate Base Allocator (\$000)	Refund Allocator %	Refund Allocation \$	Est. Avg. Customers	Avg. Cust. Refund
Residential	\$5,263,159	44.22%	\$994,098	1,224,370	\$0.81
Comm Non-Demand	\$380,915	3.20%	\$71,947	87,244	\$0.82
C&I Demand	\$6,138,312	51.57%	\$2,760,640	50,460	\$22.98
Lighting	\$119,781	1.01%	\$1,159,396	28,178	\$0.80
Total	\$11,902,167	100.00%	\$2,248,065	1,390,252	

The Department concludes that Xcel's proposed 2024 NOL refund plan is reasonable and complies with the required tracking and refund methodology set by the Commission. The Department recommends approval of the \$2,213,328 NOL refund, excluding interest, or \$2,248,065, including interest from July through September 2025.

²⁰ In the Matter of the Application of Northern States Power Company, d/b/a Xcel Energy, for Authority to Increase Rates for Natural Gas Service in Minnesota, FINDINGS OF FACT, CONCLUSIONS, AND ORDER, Minnesota Public Utilities Commission, May 14, 2012, Order point 11, Docket No. E002/GR-10-971 (eDocket) [20125-74691-01](#).

²¹ Petition, Attachment O, Page 6.

A.5. DOE Settlement Payment # 16

In March 2023, Xcel and the U.S. Government reached an agreement to extend the 2011 settlement, making the fourth extension, for the recovery of spent fuel storage damages for the three-year period from 2023 through 2025 (Payments #15, 16, and 17). The settlement amounts will be payable in 2024, 2025, and 2026. In the Petition, Xcel reports that it expects to receive DOE #16 in late 2025, but the exact amount and timing were not confirmed by the July 1 filing. The Company states that it plans to include the Minnesota jurisdictional share of DOE #16 in the combined electric refund if the amount is known by the time the refund is implemented.²²

The Department finds this approach reasonable and consistent with past practice. If DOE #16 is included, those funds will be allocated to the customer classes according to the same methodology used in prior DOE refunds, typically nuclear plant capacity and energy allocators. Xcel has indicated those allocators in Table 5 of the Petition as placeholders. In conclusion, the Department supports the inclusion of DOE Settlement #16 funds in the 2024 combined electric refund if timing allows and otherwise returning them as soon as practicable thereafter.

A.6. Xcel's Combined Electric Customer Refund Plan

The Petition outlines a comprehensive plan to combine all the electric-related refund amounts into a single refund per customer class. The components being combined for electric are:

- 2024 Property Tax true-up refund (\$18.345 million),
- 2024 AIP true-up refund (\$6.518 million),
- 2024 Capital Expenditure true-up refund (\$0, as no refund is due),
- 2024 NOL/DTA true-up refund (\$2.213 million), and
- DOE Settlement #16 refund (TBD).

Refunds from Property Tax true-up, AIP true-up, and NOL true-up will accrue interest from July 2, 2025, until the refund is issued. For those requiring interest (except for the DOE Settlement Payment #16), Xcel has used the monthly prime rate in its calculations. All refunds are calculated before interest, and then interest is added when credits are applied. The Company provided Attachment O, which details class-by-class refund factors. In summary, Xcel will calculate a refund factor (in \$/kWh) for each electric customer class by dividing the total refund amount (with interest) for that class by the class's 2024 retail sales (kWh). This approach mirrors how the prior combined refund (for 2022 and 2023 true-ups) was handled, as approved by the Commission.

In conclusion, the Department finds the Combined Electric Refund Plan to be in compliance with applicable Commission Orders and prior practices. As a result, the Department recommends the Commission approve Xcel's Combined Electric Refund Plan, which is estimated to be a \$27.1 million total refund (plus interest), and estimated to be a \$9.89 refund for the average residential customer.

²² Petition, Page 11 and 12.

B. XCEL'S PROPOSED 2024 COMBINED GAS CUSTOMER DEFERRAL PLAN

B.1. Natural Gas Property Tax True-Up

The Commission's March 5, 2025 Order in Xcel's most recent gas rate case (Docket G002/GR-23-413) set a baseline for property taxes in gas rates and implemented a property tax true-up mechanism. For 2024, Xcel's Minnesota gas jurisdiction property tax expenses were \$2.932 million higher than the amount in base rates shown in **Table 8** below:

Table 8: MN Gas Jurisdiction 2024 Property Tax Expenses (in USD)²³

MN Gas Jurisdiction	Test Year Property Tax Expense	Actual Property Tax Expense	2024 Actual Property Tax Increase/(Decrease)
Production	\$884,788	\$1,557,996	\$673,207
Transmission	\$1,297,111	\$1,458,510	\$161,399
Distribution	\$14,858,198	\$16,956,007	\$2,097,809
Common	\$ -	\$ -	\$ -
Total Gas	\$17,040,097	\$19,972,512	\$2,932,415

In the current Petition, Xcel proposes to combine the 2024 gas property tax shortfall with the results of other gas true-ups (AIP and Credit Card Fees Waiver) to determine an overall net refund or surcharge position for the gas utility. The Department has verified the accuracy of the \$2.932 million calculation and finds that the Company's method is in compliance with Commission Orders. As a result, the Department recommends the Commission accept the gas property tax true-up.

B.2. 2024 AIP Compensation True-Up – Natural Gas

For 2024, Xcel's Minnesota natural gas jurisdiction AIP actual expense was approximately \$1.6 million, versus \$1.5 million in rates. After applying the 15% cap, the eligible incentive expense for recovery was reduced, such that the Company actually over-collected \$94,656 relative to what it was permitted to recover.²⁴ Xcel proposes to combine this \$94,656 over-collection with the gas deferral. Specifically, the \$94,656 is added to the other gas refund items to offset the \$2.932 million property tax shortfall.

The Department finds this approach reasonable and consistent with the Commission Orders that gas true-up results can be netted for practical implementation. The Department verified the \$94,656 calculation and found it reasonable. As a result, the Department recommends the Commission accept the gas AIP true-up and combine the \$94,656 into the combined gas deferral as proposed.

B.3. Residential Credit Card Fees Waiver True-Up

As part of the 2021 gas rate case, the Commission approved a unanimous Settlement Agreement where parties agreed that Xcel would begin waiving credit card fees for residential ratepayers

²³ Petition, Attachment B, Page 1.

²⁴ Petition, Attachment D, Page 1.

beginning January 1, 2024.²⁵ In addition, the 2023 Order and the March 2025 Order required the Company to make annual compliance filings in May, providing the actual credit card costs incurred by the Company, and then to include the difference as part of Xcel's annual true-up process.

On May 23, 2025, Xcel submitted a filing in compliance with the Commission's April 13, 2023 Order in Docket No. G002/GR-21-678 and the March 5, 2025 Order in Docket G002/GR-21-413.²⁶ For 2024, Xcel forecasted spending \$1,691,988 on credit card fees for gas customers, assuming both one-time and Auto Pay credit card payments would be available. However, a delay in adding credit card support to Auto Pay resulted in only one-time payments incurring fees, which led to actual costs of just \$ 303,015. This difference (\$1,388,973) does not accrue interest and will be refunded to customers under the terms of the true-up mechanism. The Company indicates that because this item is specific to the residential class, the refund is allocated 100% to the residential gas class as shown in **Table 9** below:

Table 9: CC Fees Waiver Refund to Residential Customers (in USD)²⁷

Test Year Forecast	\$1,691,988	(a)
Actual spend	\$303,015	(b)
Amount to be Refunded to Gas Customers	(\$1,388,973)	(c) = (b) – (a)
2024 Estimate Average Customers	458,959	(d)
Typical Customer Refund	\$3.03	e = (c) / (d)

As part of the Combined Natural Gas Deferral Plan (discussed below), this \$1.389 million refund is netted against the \$2.932 million property tax deficit, substantially reducing the net amount deferred. The Department finds this approach is reasonable and in compliance with the Commission Orders. As a result, the Department recommends the Commission accept Xcel's Credit Card Fees Waiver true-up.

B.4. Xcel's Combined Natural Gas Customer Deferral Plan

For the natural gas true-up, 2024 resulted in a net under-collection when all true-up items are combined. As detailed earlier: a \$2.932 million under-collection in property taxes was partially offset by a \$94,656 over-collection in AIP and a \$1.389 million over-collection in credit card fees. Additionally, a residual deferral of \$0.168 million from prior years was carried into 2024. In sum, the net outcome is a \$1.616 million under-collection (deferral) for 2024. The Company states that all components of the

²⁵ In the Matter of the Application of Northern States Power Company, d/b/a Xcel Energy, for Authority to Increase Natural Gas Rates in Minnesota, Docket No. G002/GR-21-678, SETTLEMENT AGREEMENT at Section III.C.17, October 4, 2022, (eDocket) [202210-189551-01](#); and In the Matter of the Application of Northern States Power Company, d/b/a Xcel Energy, for Authority to Increase Natural Gas Rates in Minnesota, Docket No. G002/GR-23-413, SETTLEMENT AGREEMENT at Section III.C.23, June 26, 2024 (eDocket) [20246-207989-01](#).

²⁶ In the Matter of the Compliance Filing of Northern States Power Company, d/b/a Xcel Energy, in compliance with the Minnesota Public Utilities Commission's April 13, 2023 ORDER ACCEPTING AGREEMENT, SETTING RATES AND UPDATING BASE COST OF GAS in Docket No. G002/GR-21-678 (2023 Order) and the March 5, 2025 ORDER ACCEPTING AND ADOPTING AGREEMENT SETTING RATES in Docket No. G002/GR23-413 (2025 Order). (eDocket) [20255-219218-01](#)

²⁷ Petition, Table 4 , Page 11, Attachment P, Page 4.

net natural gas deferral are allocated to class separately, after which the deferrals and refunds owed to each class are combined.²⁸ After combining these, the residential class has a net (\$0.44) per customer deferred balance. Because this is a net deferral owed by customers, there will be no credits on customer bills for gas at this time.

The Department finds that Xcel's Combined Gas Deferral Plan properly nets all relevant items and is in compliance with Commission Orders. As a result, the Department recommends the Commission accept Xcel's Combined Gas Deferral Plan and approve the deferral amount of (\$1.616,608).

C. CUSTOMER BILL MESSAGE

Xcel plans to issue the combined electric refund as a one-time bill credit in either Q3 or Q4 of 2025. The combined refund will appear on bills as a single line item "Combined Elec. Refund CR." The Company proposes a draft bill message with two options (one with the DOE refund included and one without).

Xcel states that they will work with the Commission's Consumer Affairs Office to finalize the bill message in advance of implementing the 2024 Electric Combined Refund Plan. The Company also plans to file a compliance report summarizing the results of the combined refund that will be filed within 30 days of completing the refund payments to customers.

The Department finds the customer bill message for the 2024 combined refund to be reasonable and consistent with the 2023 combined refund (November 2024 Order). The Department considers a compliance report by Xcel 30 days after completion of the refund payments to customers to be reasonable.

IV. DEPARTMENT RECOMMENDATIONS

After reviewing Xcel's compliance report, the Department recommends the Commission take the following actions:

A. XCEL'S PROPOSED 2024 COMBINED RESIDENTIAL ELECTRIC CUSTOMER REFUND PLAN

- Approve the Company's proposed 2024 Property Tax true-up refund in the amount of **\$18,633,012, including interest from July through September 2025**, for electric customers;
- Approve the Company's proposed 2024 AIP true-up refund in the amount of **\$6,620,089, including interest from July through September 2025**, for electric customers;
- Accept the Company's 2024 Electric Capital Expenditure true-up report;
- Approve the Company's proposed 2024 NOL-related Deferred Tax Asset true-up refund in the amount of **\$2,248,065, including interest from July through September 2025**, for electric customers;
- Accept the Company's proposed DOE Settlement Payment # 16 refund plan;

²⁸ Petition, Page 14.

- Authorize the Company to apply, on a monthly basis, the average monthly prime interest rate to its Property Tax refund, AIP refund, and NOL-related Deferred Tax Asset refund through the month immediately preceding the billing cycle in which the Company issues refunds to ratepayers;
- Approve the Company's proposed plan to combine Property Tax refund, AIP refund, and NOL-related Deferred Tax Asset refund, as long as interest on refund amounts accrues until the excess rate recoveries are refunded;
- Require Xcel to include its finalized refund message on customer bills to alert ratepayers to the reason for the refund(s); and
- Require Xcel to file a compliance report summarizing the results of the combined refund within 30 days of completing the refund process.

B. XCEL'S PROPOSED 2024 COMBINED GAS CUSTOMER DEFERRAL PLAN

- Approve the Company's proposed 2024 Property Tax true-up deferral in the amount of **(\$2,932,415)** for gas customers;
- Approve the Company's proposed 2024 AIP true-up refund in the amount of **\$94,656** for gas customers;
- Approve the Company's proposed 2024 Credit Card Fees Waiver refund in the amount of **\$1,388,973** for gas customers;
- Approve the Company's proposal to combine the 2024 Property Tax deferral, AIP gas refund, and Credit Card Fees Waiver refund.

CERTIFICATE OF SERVICE

I, Sharon Ferguson, hereby certify that I have this day, served copies of the following document on the attached list of persons by electronic filing, certified mail, e-mail, or by depositing a true and correct copy thereof properly enveloped with postage paid in the United States Mail at St. Paul, Minnesota.

Minnesota Department of Commerce
Comments

Docket No. E002/GR-21-630, G002/GR-21-678, G002/GR-23-413, E002/GR-10-971, E002/M-21-815, E002/M-22-489, E, G002/M-23-468, E, G002/M-24-221, and E, G002/M-25-277

Dated this **11th** day of **August 2025**

/s/Sharon Ferguson

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34	Samantha	Norris	samanthanorris@alliantenergy.com	Interstate Power and Light Company		200 1st Street SE PO Box 351 Cedar Rapids IA, 52406-0351 United States	Electronic Service		No	21-67821-678
35	Greg	Palmer	gpalmer@greatermngas.com	Greater Minnesota Gas, Inc.		1900 Cardinal Ln PO Box 798 Faribault MN, 55021 United States	Electronic Service		No	21-67821-678
36	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	21-67821-678
37	Joseph L	Sathe	jsathe@kennedy-graven.com	Kennedy & Graven, Chartered		150 S 5th St Ste 700 Minneapolis MN, 55402 United States	Electronic Service		No	21-67821-678

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
38	Elizabeth	Schmiesing	eschmiesing@winthrop.com	Winthrop & Weinstine, P.A.		225 South Sixth Street Suite 3500 Minneapolis MN, 55402 United States	Electronic Service		No	21-67821-678
39	Christine	Schwartz	regulatory.records@xcelenergy.com	Xcel Energy		414 Nicollet Mall, MN1180-07-MCA Minneapolis MN, 55401-1993 United States	Electronic Service		No	21-67821-678
40	Janet	Shaddix Eling	jshaddix@janetshaddix.com	Shaddix And Associates		7400 Lyndale Ave S Ste 190 Richfield MN, 55423 United States	Electronic Service		No	21-67821-678
41	James M	Strommen	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered		150 S 5th St Ste 700 Minneapolis MN, 55402 United States	Electronic Service		No	21-67821-678
42	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	21-67821-678
43	Joseph	Windler	jwindler@winthrop.com	Winthrop & Weinstine		225 South Sixth Street, Suite 3500 Minneapolis MN, 55402 United States	Electronic Service		No	21-67821-678

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
53	James M	Strommen	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered		150 S 5th St Ste 700 Minneapolis MN, 55402 United States	Electronic Service		No	21-815M-21-815
54	Joseph	Windler	jwindler@winthrop.com	Winthrop & Weinstine		225 South Sixth Street, Suite 3500 Minneapolis MN, 55402 United States	Electronic Service		No	21-815M-21-815
55	Kurt	Zimmerman	kwz@ibew160.org	Local Union #160, IBEW		2909 Anthony Ln St Anthony Village MN, 55418-3238 United States	Electronic Service		No	21-815M-21-815
56	Patrick	Zomer	pat.zomer@lawmoss.com	Moss & Barnett PA		150 S 5th St #1200 Minneapolis MN, 55402 United States	Electronic Service		No	21-815M-21-815

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
1	Matthew	Brodin	mbrodin@allete.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	22-489PA-22-489
2	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	22-489PA-22-489
3	John	Coffman	john@johncoffman.net	AARP		871 Tuxedo Blvd. St. Louis MO, 63119-2044 United States	Electronic Service		No	22-489PA-22-489
4	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	22-489PA-22-489
5	George	Crocker	gwillc@nawo.org	North American Water Office		5093 Keats Avenue Lake Elmo MN, 55042 United States	Electronic Service		No	22-489PA-22-489
6	Ian M.	Dobson	ian.m.dobson@xcelenergy.com	Xcel Energy		414 Nicollet Mall, 401-8 Minneapolis MN, 55401 United States	Electronic Service		No	22-489PA-22-489
7	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	22-489PA-22-489
8	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	22-489PA-22-489
9	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	22-489PA-22-489
10	Adam	Heinen	aheinen@dakotaelectric.com	Dakota Electric Association		4300 220th St W Farmington MN, 55024 United States	Electronic Service		No	22-489PA-22-489
11	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	22-489PA-22-489
12	Alan	Jenkins	aj@jenkinsatlaw.com	Jenkins at Law		2950 Yellowtail Ave. Marathon FL, 33050 United States	Electronic Service		No	22-489PA-22-489
13	Richard	Johnson	rick.johnson@lawmoss.com	Moss & Barnett		150 S. 5th Street Suite 1200 Minneapolis	Electronic Service		No	22-489PA-22-489

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						MN, 55402 United States				
14	Sarah	Johnson Phillips	sjphillips@stoel.com	Stoel Rives LLP		33 South Sixth Street Suite 4200 Minneapolis MN, 55402 United States	Electronic Service		No	22-489PA-22-489
15	Peder	Larson	plarson@larkinhoffman.com	Larkin Hoffman Daly & Lindgren, Ltd.		8300 Norman Center Drive Suite 1000 Bloomington MN, 55437 United States	Electronic Service		No	22-489PA-22-489
16	Kavita	Maini	kmairi@wi.rr.com	KM Energy Consulting, LLC		961 N Lost Woods Rd Oconomowoc WI, 53066 United States	Electronic Service		No	22-489PA-22-489
17	Stacy	Miller	stacy.miller@minneapolismn.gov	City of Minneapolis		350 S. 5th Street Room M 301 Minneapolis MN, 55415 United States	Electronic Service		No	22-489PA-22-489
18	David	Moeller	dmoeller@allete.com	Minnesota Power			Electronic Service		No	22-489PA-22-489
19	Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP		33 South Sixth St Ste 4200 Minneapolis MN, 55402 United States	Electronic Service		No	22-489PA-22-489
20	David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency		220 South Sixth Street Suite 1300 Minneapolis MN, 55402 United States	Electronic Service		No	22-489PA-22-489
21	Carol A.	Overland	overland@legalelectric.org	Legalelectric - Overland Law Office		1110 West Avenue Red Wing MN, 55066 United States	Electronic Service		No	22-489PA-22-489
22	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	22-489PA-22-489
23	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	22-489PA-22-489
24	Christine	Schwartz	regulatory.records@xcelenergy.com	Xcel Energy		414 Nicollet Mall, MN1180-07-MCA Minneapolis MN, 55401-1993 United States	Electronic Service		No	22-489PA-22-489
25	Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.		76 W Kellogg Blvd St. Paul MN, 55102 United States	Electronic Service		No	22-489PA-22-489
26	Byron E.	Starns	byron.starns@stinson.com	STINSON LLP		50 S 6th St Ste 2600 Minneapolis	Electronic Service		No	22-489PA-22-489

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						MN, 55402 United States				
27	James M	Strommen	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered		150 S 5th St Ste 700 Minneapolis MN, 55402 United States	Electronic Service		No	22-489PA-22-489
28	Joseph	Windler	jwindler@winthrop.com	Winthrop & Weinstine		225 South Sixth Street, Suite 3500 Minneapolis MN, 55402 United States	Electronic Service		No	22-489PA-22-489
29	Kurt	Zimmerman	kwz@ibew160.org	Local Union #160, IBEW		2909 Anthony Ln St Anthony Village MN, 55418-3238 United States	Electronic Service		No	22-489PA-22-489
30	Patrick	Zomer	pat.zomer@lawmoss.com	Moss & Barnett PA		150 S 5th St #1200 Minneapolis MN, 55402 United States	Electronic Service		No	22-489PA-22-489

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
13	Brandon	Crawford	brandonc@cubminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota St Ste W1360 St. Paul MN, 55101 United States	Electronic Service		No	23-413Official
14	George	Crocker	gwillc@nawo.org	North American Water Office		5093 Keats Avenue Lake Elmo MN, 55042 United States	Electronic Service		No	23-413Official
15	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	23-413Official
16	Brian	Edstrom	briane@cubminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota St Ste W1360 Saint Paul MN, 55101 United States	Electronic Service		No	23-413Official
17	Rebecca	Eilers	rebecca.d.eilers@xcelenergy.com	Xcel Energy		414 Nicollet Mall - 401 7th Floor Minneapolis MN, 55401 United States	Electronic Service		No	23-413Official
18	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	23-413Official
19	Edward	Garvey	garveyed@aol.com	Residence		32 Lawton St Saint Paul MN, 55102 United States	Electronic Service		No	23-413Official
20	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	23-413Official
21	Matthew B	Harris	matt.b.harris@xcelenergy.com	XCEL ENERGY		401 Nicollet Mall FL 8 Minneapolis MN, 55401 United States	Electronic Service		No	23-413Official
22	Annete	Henkel	mui@mutilityinvestors.org	Minnesota Utility Investors		413 Wacouta Street #230 St.Paul MN, 55101 United States	Electronic Service		No	23-413Official
23	Valerie	Herring	vherring@taftlaw.com	Taft Stettinius & Hollister LLP		2200 IDS Center 80 S. Eighth Street Minneapolis MN, 55402 United States	Electronic Service		No	23-413Official
24	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	23-413Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
25	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	23-413Official
26	Richard	Johnson	rick.johnson@lawmoss.com	Moss & Barnett		150 S. 5th Street Suite 1200 Minneapolis MN, 55402 United States	Electronic Service		No	23-413Official
27	Sarah	Johnson Phillips	sjphillips@stoel.com	Stoel Rives LLP		33 South Sixth Street Suite 4200 Minneapolis MN, 55402 United States	Electronic Service		No	23-413Official
28	Nicolle	Kupser	nkupser@greatermngas.com	Greater Minnesota Gas, Inc.		1900 Cardinal Ln PO Box 798 Faribault MN, 55021 United States	Electronic Service		No	23-413Official
29	Peder	Larson	plarson@larkinhoffman.com	Larkin Hoffman Daly & Lindgren, Ltd.		8300 Norman Center Drive Suite 1000 Bloomington MN, 55437 United States	Electronic Service		No	23-413Official
30	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	23-413Official
31	Eric	Lipman	eric.lipman@state.mn.us		Office of Administrative Hearings	PO Box 64620 St. Paul MN, 55164-0620 United States	Electronic Service		No	23-413Official
32	Mary	Martinka	mary.a.martinka@xcelenergy.com	Xcel Energy Inc		414 Nicollet Mall 7th Floor Minneapolis MN, 55401 United States	Electronic Service		No	23-413Official
33	Stephen	Melchionne	stephen.melchionne@ag.state.mn.us		Office of the Attorney General - Department of Commerce	445 Minnesota Street, Ste. 1400 St. Paul MN, 55101 United States	Electronic Service		No	23-413Official
34	Kimberly	Middendorf	kimberly.middendorf@state.mn.us		Office of Administrative Hearings	PO Box 64620 600 Robert St N Saint Paul MN, 55164-0620 United States	Electronic Service		No	23-413Official
35	David	Moeller	dmoeller@allete.com	Minnesota Power			Electronic Service		No	23-413Official
36	Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP		33 South Sixth St Ste 4200 Minneapolis MN, 55402 United States	Electronic Service		No	23-413Official
37	Travis	Murray	travis.murray@ag.state.mn.us		Office of the Attorney General -	445 Minnesota St Ste 1400	Electronic Service		No	23-413Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
					Residential Utilities Division	Saint Paul MN, 55101 United States				
38	David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency		220 South Sixth Street Suite 1300 Minneapolis MN, 55402 United States	Electronic Service		No	23-413Official
39	Samantha	Norris	samanthanorris@alliantenergy.com	Interstate Power and Light Company		200 1st Street SE PO Box 351 Cedar Rapids IA, 52406-0351 United States	Electronic Service		No	23-413Official
40	Greg	Palmer	gpalmer@greatermngas.com	Greater Minnesota Gas, Inc.		1900 Cardinal Ln PO Box 798 Faribault MN, 55021 United States	Electronic Service		No	23-413Official
41	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	23-413Official
42	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	23-413Official
43	Joseph L	Sathe	jsathe@kennedy-graven.com	Kennedy & Graven, Chartered		150 S 5th St Ste 700 Minneapolis MN, 55402 United States	Electronic Service		No	23-413Official
44	Elizabeth	Schmiesing	eschmiesing@winthrop.com	Winthrop & Weinstine, P.A.		225 South Sixth Street Suite 3500 Minneapolis MN, 55402 United States	Electronic Service		No	23-413Official
45	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	23-413Official
46	Christine	Schwartz	regulatory.records@xcelenergy.com	Xcel Energy		414 Nicollet Mall, MN1180-07-MCA Minneapolis MN, 55401-1993 United States	Electronic Service		No	23-413Official
47	Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates		7400 Lyndale Ave S Ste 190 Richfield MN, 55423 United States	Electronic Service		No	23-413Official
48	James M	Strommen	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered		150 S 5th St Ste 700 Minneapolis MN, 55402 United States	Electronic Service		No	23-413Official
49	Suzanne	Todnem	suzanne.todnem@state.mn.us		Office of Administrative Hearings	600 Robert St N PO Box 64620	Electronic Service		Yes	23-413Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						St. Paul MN, 55164 United States				
50	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	23-413Official
51	Joseph	Windler	jwindler@winthrop.com	Winthrop & Weinstine		225 South Sixth Street, Suite 3500 Minneapolis MN, 55402 United States	Electronic Service		No	23-413Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
1	Kevin	Adams	kadams@caprw.org	Community Action Partnership of Ramsey & Washington Counties		450 Syndicate St N Ste 35 Saint Paul MN, 55104 United States	Electronic Service		No	23-468M-23-468
2	Mara	Ascheman	mara.k.ascheman@xcelenergy.com	Xcel Energy		414 Nicollet Mall FI 5 Minneapolis MN, 55401 United States	Electronic Service		No	23-468M-23-468
3	Gail	Baranko	gail.baranko@xcelenergy.com	Xcel Energy		414 Nicollet Mall 7th Floor Minneapolis MN, 55401 United States	Electronic Service		No	23-468M-23-468
4	Jessica L	Bayles	jessica.bayles@stoel.com	Stoel Rives LLP		1150 18th St NW Ste 325 Washington DC, 20036 United States	Electronic Service		No	23-468M-23-468
5	Barb	Bischoff	barb.bischoff@nngco.com	Northern Natural Gas Co.		CORP HQ, 714 1111 So. 103rd Street Omaha NE, 68124-1000 United States	Electronic Service		No	23-468M-23-468
6	Elizabeth	Brama	ebrama@taftlaw.com	Taft Stettinius & Hollister LLP		2200 IDS Center 80 South 8th Street Minneapolis MN, 55402 United States	Electronic Service		No	23-468M-23-468
7	Matthew	Brodin	mbrodin@allete.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	23-468M-23-468
8	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	23-468M-23-468
9	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	23-468M-23-468
10	John	Coffman	john@johncoffman.net	AARP		871 Tuxedo Blvd. St, Louis MO, 63119-2044 United States	Electronic Service		No	23-468M-23-468
11	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	23-468M-23-468
12	George	Crocker	gwillc@nawo.org	North American Water Office		5093 Keats Avenue Lake Elmo MN, 55042 United States	Electronic Service		No	23-468M-23-468
13	James	Denniston	james.r.denniston@xcelenergy.com	Xcel Energy Services, Inc.		414 Nicollet Mall, 401-8 Minneapolis	Electronic Service		No	23-468M-23-468

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
25	Shubha	Harris	shubha.m.harris@xcelenergy.com	Xcel Energy		414 Nicollet Mall, 401 - FL 8 Minneapolis MN, 55401 United States	Electronic Service		No	23-468M-23-468
26	Amber	Hedlund	amber.r.hedlund@xcelenergy.com	Northern States Power Company dba Xcel Energy-Elec		414 Nicollet Mall, 401-7 Minneapolis MN, 55401 United States	Electronic Service		No	23-468M-23-468
27	Adam	Heinen	aheinen@dakotaelectric.com	Dakota Electric Association		4300 220th St W Farmington MN, 55024 United States	Electronic Service		No	23-468M-23-468
28	Annete	Henkel	mui@mnuutilityinvestors.org	Minnesota Utility Investors		413 Wacouta Street #230 St. Paul MN, 55101 United States	Electronic Service		No	23-468M-23-468
29	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	23-468M-23-468
30	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	23-468M-23-468
31	Geoffrey	Inge	ginge@regintl.com	Regulatory Intelligence LLC		PO Box 270636 Superior CO, 80027-9998 United States	Electronic Service		No	23-468M-23-468
32	Alan	Jenkins	aj@jenkinsatlaw.com	Jenkins at Law		2950 Yellowtail Ave. Marathon FL, 33050 United States	Electronic Service		No	23-468M-23-468
33	Richard	Johnson	rick.johnson@lawmoss.com	Moss & Barnett		150 S. 5th Street Suite 1200 Minneapolis MN, 55402 United States	Electronic Service		No	23-468M-23-468
34	Sarah	Johnson Phillips	sjphillips@stoel.com	Stoel Rives LLP		33 South Sixth Street Suite 4200 Minneapolis MN, 55402 United States	Electronic Service		No	23-468M-23-468
35	Michael	Krikava	mkrikava@taftlaw.com	Taft Stettinius & Hollister LLP		2200 IDS Center 80 S 8th St Minneapolis MN, 55402 United States	Electronic Service		No	23-468M-23-468
36	Carmel	Laney	carmel.laney@stoel.com	Stoel Rives LLP		33 South Sixth Street Suite 4200 Minneapolis MN, 55402 United States	Electronic Service		No	23-468M-23-468
37	Peder	Larson	plarson@larkinhoffman.com	Larkin Hoffman Daly & Lindgren, Ltd.		8300 Norman Center Drive Suite 1000 Bloomington MN, 55437 United States	Electronic Service		No	23-468M-23-468

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
38	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	23-468M-23-468
39	Ryan	Long	ryan.j.long@xcelenergy.com			414 Nicollet Mall 401 8th Floor Minneapolis MN, 55401 United States	Electronic Service		No	23-468M-23-468
40	Alice	Madden	alice@communitypowermn.org	Community Power		2720 E 22nd St Minneapolis MN, 55406 United States	Electronic Service		No	23-468M-23-468
41	Kavita	Maini	kmains@wi.rr.com	KM Energy Consulting, LLC		961 N Lost Woods Rd Oconomowoc WI, 53066 United States	Electronic Service		No	23-468M-23-468
42	Mary	Martinka	mary.a.martinka@xcelenergy.com	Xcel Energy Inc		414 Nicollet Mall 7th Floor Minneapolis MN, 55401 United States	Electronic Service		No	23-468M-23-468
43	Erica	McConnell	emcconnell@elpc.org	Environmental Law & Policy Center		35 E. Wacker Drive, Suite 1600 Chicago IL, 60601 United States	Electronic Service		No	23-468M-23-468
44	Joseph	Meyer	joseph.meyer@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	Bremer Tower, Suite 1400 445 Minnesota Street St Paul MN, 55101-2131 United States	Electronic Service		No	23-468M-23-468
45	Stacy	Miller	stacy.miller@minneapolismn.gov	City of Minneapolis		350 S. 5th Street Room M 301 Minneapolis MN, 55415 United States	Electronic Service		No	23-468M-23-468
46	David	Moeller	dmoeller@allete.com	Minnesota Power			Electronic Service		No	23-468M-23-468
47	Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP		33 South Sixth St Ste 4200 Minneapolis MN, 55402 United States	Electronic Service		No	23-468M-23-468
48	Christa	Moseng	christa.moseng@state.mn.us		Office of Administrative Hearings	P.O. Box 64620 Saint Paul MN, 55164-0620 United States	Electronic Service		No	23-468M-23-468
49	David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency		220 South Sixth Street Suite 1300 Minneapolis MN, 55402 United States	Electronic Service		No	23-468M-23-468
50	Carol A.	Overland	overland@legalelectric.org	Legalelectric - Overland Law Office		1110 West Avenue Red Wing	Electronic Service		No	23-468M-23-468

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						MN, 55066 United States				
51	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	23-468M-23-468
52	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	23-468M-23-468
53	Amanda	Rome	amanda.rome@xcelenergy.com	Xcel Energy		414 Nicollet Mall FL 5 Minneapoli MN, 55401 United States	Electronic Service		No	23-468M-23-468
54	Joseph L	Sathe	jsathe@kennedy-graven.com	Kennedy & Graven, Chartered		150 S 5th St Ste 700 Minneapolis MN, 55402 United States	Electronic Service		No	23-468M-23-468
55	Elizabeth	Schmiesing	eschmiesing@winthrop.com	Winthrop & Weinstine, P.A.		225 South Sixth Street Suite 3500 Minneapolis MN, 55402 United States	Electronic Service		No	23-468M-23-468
56	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	23-468M-23-468
57	Christine	Schwartz	regulatory.records@xcelenergy.com	Xcel Energy		414 Nicollet Mall, MN1180-07-MCA Minneapolis MN, 55401-1993 United States	Electronic Service		No	23-468M-23-468
58	Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates		7400 Lyndale Ave S Ste 190 Richfield MN, 55423 United States	Electronic Service		No	23-468M-23-468
59	Joshua	Smith	joshua.smith@sierraclub.org			85 Second St FL 2 San Francisco CA, 94105 United States	Electronic Service		No	23-468M-23-468
60	Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.		76 W Kellogg Blvd St. Paul MN, 55102 United States	Electronic Service		No	23-468M-23-468
61	Beth	Soholt	bsoholt@cleangridalliance.org	Clean Grid Alliance		570 Asbury Street Suite 201 St. Paul MN, 55104 United States	Electronic Service		No	23-468M-23-468

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
62	Russ	Stark	russ.stark@ci.stpaul.mn.us	City of St. Paul		Mayor's Office 15 W. Kellogg Blvd., Suite 390 Saint Paul MN, 55102 United States	Electronic Service		No	23-468M-23-468
63	Byron E.	Starns	byron.starns@stinson.com	STINSON LLP		50 S 6th St Ste 2600 Minneapolis MN, 55402 United States	Electronic Service		No	23-468M-23-468
64	James M	Strommen	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered		150 S 5th St Ste 700 Minneapolis MN, 55402 United States	Electronic Service		No	23-468M-23-468
65	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	23-468M-23-468
66	Joseph	Windler	jwindler@winthrop.com	Winthrop & Weinstine		225 South Sixth Street, Suite 3500 Minneapolis MN, 55402 United States	Electronic Service		No	23-468M-23-468
67	B	Wolf	bwolf@ci.stillwater.mn.us	Board of Water Commissioners		1900 N Rice St St. Paul MN, 55113 United States	Electronic Service		No	23-468M-23-468
68	Katy	Wortel	enviros@hickorytech.net	Mankato Area Environmentalists		1411 Pohl Road Mankato MN, 56001-5751 United States	Electronic Service		No	23-468M-23-468
69	Kurt	Zimmerman	kwz@ibew160.org	Local Union #160, IBEW		2909 Anthony Ln St Anthony Village MN, 55418-3238 United States	Electronic Service		No	23-468M-23-468
70	Patrick	Zomer	pat.zomer@lawmoss.com	Moss & Barnett PA		150 S 5th St #1200 Minneapolis MN, 55402 United States	Electronic Service		No	23-468M-23-468

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
1	Kevin	Adams	kadams@caprw.org	Community Action Partnership of Ramsey & Washington Counties		450 Syndicate St N Ste 35 Saint Paul MN, 55104 United States	Electronic Service		No	24-221M-24-221
2	Kristine	Anderson	kanderson@greatermngas.com	Greater Minnesota Gas, Inc.		1900 Cardinal Lane PO Box 798 Faribault MN, 55021 United States	Electronic Service		No	24-221M-24-221
3	Mara	Ascheman	mara.k.ascheman@xcelenergy.com	Xcel Energy		414 Nicollet Mall Fl 5 Minneapolis MN, 55401 United States	Electronic Service		No	24-221M-24-221
4	Gail	Baranko	gail.baranko@xcelenergy.com	Xcel Energy		414 Nicollet Mall 7th Floor Minneapolis MN, 55401 United States	Electronic Service		No	24-221M-24-221
5	Jessica L	Bayles	jessica.bayles@stoel.com	Stoel Rives LLP		1150 18th St NW Ste 325 Washington DC, 20036 United States	Electronic Service		No	24-221M-24-221
6	Elizabeth	Brama	ebrama@taftlaw.com	Taft Stettinius & Hollister LLP		2200 IDS Center 80 South 8th Street Minneapolis MN, 55402 United States	Electronic Service		No	24-221M-24-221
7	Matthew	Brodin	mbrodin@allete.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	24-221M-24-221
8	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	24-221M-24-221
9	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	24-221M-24-221
10	Robert S.	Carney, Jr.				4232 Colfax Ave. S. Minneapolis MN, 55409 United States	Paper Service		No	24-221M-24-221
11	John	Coffman	john@johncoffman.net	AARP		871 Tuxedo Blvd. St. Louis MO, 63119-2044 United States	Electronic Service		No	24-221M-24-221
12	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	24-221M-24-221
13	George	Crocker	gwillc@nawo.org	North American Water Office		5093 Keats Avenue Lake Elmo MN, 55042 United States	Electronic Service		No	24-221M-24-221
14	James	Denniston	james.r.denniston@xcelenergy.com	Xcel Energy Services, Inc.		414 Nicollet Mall, 401-8 Minneapolis	Electronic Service		No	24-221M-24-221

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						MN, 55401 United States				
15	Ian M.	Dobson	ian.m.dobson@xcelenergy.com	Xcel Energy		414 Nicollet Mall, 401-8 Minneapolis MN, 55401 United States	Electronic Service		No	24-221M-24-221
16	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	24-221M-24-221
17	Brian	Edstrom	briane@cubminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota St Ste W1360 Saint Paul MN, 55101 United States	Electronic Service		No	24-221M-24-221
18	Rebecca	Eilers	rebecca.d.eilers@xcelenergy.com	Xcel Energy		414 Nicollet Mall - 401 7th Floor Minneapolis MN, 55401 United States	Electronic Service		No	24-221M-24-221
19	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	24-221M-24-221
20	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	24-221M-24-221
21	Lucas	Franco	lfranco@liunagroc.com	LIUNA		81 Little Canada Rd E Little Canada MN, 55117 United States	Electronic Service		No	24-221M-24-221
22	Edward	Garvey	garveyed@aol.com	Residence		32 Lawton St Saint Paul MN, 55102 United States	Electronic Service		No	24-221M-24-221
23	Allen	Gleckner	agleckner@elpc.org	Environmental Law & Policy Center		35 E. Wacker Drive, Suite 1600 Suite 1600 Chicago IL, 60601 United States	Electronic Service		No	24-221M-24-221
24	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	24-221M-24-221
25	Matthew B	Harris	matt.b.harris@xcelenergy.com	XCEL ENERGY		401 Nicollet Mall FL 8 Minneapolis MN, 55401 United States	Electronic Service		No	24-221M-24-221
26	Shubha	Harris	shubha.m.harris@xcelenergy.com	Xcel Energy		414 Nicollet Mall, 401 - FL 8 Minneapolis	Electronic Service		No	24-221M-24-221

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						MN, 55401 United States				
27	Amber	Hedlund	amber.r.hedlund@xcelenergy.com	Northern States Power Company dba Xcel Energy-Elec		414 Nicollet Mall, 401-7 Minneapolis MN, 55401 United States	Electronic Service		No	24-221M-24-221
28	Adam	Heinen	aheinen@dakotaelectric.com	Dakota Electric Association		4300 220th St W Farmington MN, 55024 United States	Electronic Service		No	24-221M-24-221
29	Annete	Henkel	mui@mnutilityinvestors.org	Minnesota Utility Investors		413 Wacouta Street #230 St.Paul MN, 55101 United States	Electronic Service		No	24-221M-24-221
30	Valerie	Herring	vherring@taftlaw.com	Taft Stettinius & Hollister LLP		2200 IDS Center 80 S. Eighth Street Minneapolis MN, 55402 United States	Electronic Service		No	24-221M-24-221
31	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	24-221M-24-221
32	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	24-221M-24-221
33	Geoffrey	Inge	ginge@regintl.com	Regulatory Intelligence LLC		PO Box 270636 Superior CO, 80027-9998 United States	Electronic Service		No	24-221M-24-221
34	Alan	Jenkins	aj@jenkinsatlaw.com	Jenkins at Law		2950 Yellowtail Ave. Marathon FL, 33050 United States	Electronic Service		No	24-221M-24-221
35	Richard	Johnson	rick.johnson@lawmoss.com	Moss & Barnett		150 S. 5th Street Suite 1200 Minneapolis MN, 55402 United States	Electronic Service		No	24-221M-24-221
36	Sarah	Johnson Phillips	sjphillips@stoel.com	Stoel Rives LLP		33 South Sixth Street Suite 4200 Minneapolis MN, 55402 United States	Electronic Service		No	24-221M-24-221
37	Michael	Krikava	mkrikava@taftlaw.com	Taft Stettinius & Hollister LLP		2200 IDS Center 80 S 8th St Minneapolis MN, 55402 United States	Electronic Service		No	24-221M-24-221
38	Nicolle	Kupser	nkupser@greatermngas.com	Greater Minnesota Gas, Inc.		1900 Cardinal Ln PO Box 798 Faribault MN, 55021 United States	Electronic Service		No	24-221M-24-221
39	Carmel	Laney	carmel.laney@stoel.com	Stoel Rives LLP		33 South Sixth Street Suite 4200	Electronic Service		No	24-221M-24-221

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						Minneapolis MN, 55402 United States				
40	Peder	Larson	plarson@larkinhoffman.com	Larkin Hoffman Daly & Lindgren, Ltd.		8300 Norman Center Drive Suite 1000 Bloomington MN, 55437 United States	Electronic Service		No	24-221M-24-221
41	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	24-221M-24-221
42	Eric	Lipman	eric.lipman@state.mn.us		Office of Administrative Hearings	PO Box 64620 St. Paul MN, 55164-0620 United States	Electronic Service		Yes	24-221M-24-221
43	Ryan	Long	ryan.j.long@xcelenergy.com			414 Nicollet Mall 401 8th Floor Minneapolis MN, 55401 United States	Electronic Service		No	24-221M-24-221
44	Alice	Madden	alice@communitypowermn.org	Community Power		2720 E 22nd St Minneapolis MN, 55406 United States	Electronic Service		No	24-221M-24-221
45	Kavita	Maini	kmaini@wi.rr.com	KM Energy Consulting, LLC		961 N Lost Woods Rd Oconomowoc WI, 53066 United States	Electronic Service		No	24-221M-24-221
46	Mary	Martinka	mary.a.martinka@xcelenergy.com	Xcel Energy Inc		414 Nicollet Mall 7th Floor Minneapolis MN, 55401 United States	Electronic Service		No	24-221M-24-221
47	Erica	McConnell	emcconnell@elpc.org	Environmental Law & Policy Center		35 E. Wacker Drive, Suite 1600 Chicago IL, 60601 United States	Electronic Service		No	24-221M-24-221
48	Greg	Merz	greg.merz@ag.state.mn.us		Office of the Attorney General - Department of Commerce	445 Minnesota Street Suite 1400 St. Paul MN, 55101 United States	Electronic Service		No	24-221M-24-221
49	Joseph	Meyer	joseph.meyer@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	Bremer Tower, Suite 1400 445 Minnesota Street St Paul MN, 55101-2131 United States	Electronic Service		No	24-221M-24-221
50	Kimberly	Middendorf	kimberly.middendorf@state.mn.us		Office of Administrative Hearings	PO Box 64620 600 Robert St N Saint Paul MN, 55164-0620 United States	Electronic Service		No	24-221M-24-221
51	Stacy	Miller	stacy.miller@minneapolismn.gov	City of Minneapolis		350 S. 5th Street Room M 301 Minneapolis MN, 55415 United States	Electronic Service		No	24-221M-24-221
52	David	Moeller	dmoeller@allete.com	Minnesota Power			Electronic Service		No	24-221M-24-221

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
53	Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP		33 South Sixth St Ste 4200 Minneapolis MN, 55402 United States	Electronic Service		No	24-221M-24-221
54	Christa	Moseng	christa.moseng@state.mn.us		Office of Administrative Hearings	P.O. Box 64620 Saint Paul MN, 55164-0620 United States	Electronic Service		No	24-221M-24-221
55	Travis	Murray	travis.murray@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	445 Minnesota St Ste 1400 Saint Paul MN, 55101 United States	Electronic Service		No	24-221M-24-221
56	David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency		220 South Sixth Street Suite 1300 Minneapolis MN, 55402 United States	Electronic Service		No	24-221M-24-221
57	Samantha	Norris	samanthanorris@alliantenergy.com	Interstate Power and Light Company		200 1st Street SE PO Box 351 Cedar Rapids IA, 52406-0351 United States	Electronic Service		No	24-221M-24-221
58	Carol A.	Overland	overland@legalelectric.org	Legalelectric - Overland Law Office		1110 West Avenue Red Wing MN, 55066 United States	Electronic Service		No	24-221M-24-221
59	Greg	Palmer	gpalmer@greatermngas.com	Greater Minnesota Gas, Inc.		1900 Cardinal Ln PO Box 798 Faribault MN, 55021 United States	Electronic Service		No	24-221M-24-221
60	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	24-221M-24-221
61	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	24-221M-24-221
62	Amanda	Rome	amanda.rome@xcelenergy.com	Xcel Energy		414 Nicollet Mall FL 5 Minneapolis MN, 55401 United States	Electronic Service		No	24-221M-24-221
63	Joseph L	Sathe	jsathe@kennedy-graven.com	Kennedy & Graven, Chartered		150 S 5th St Ste 700 Minneapolis MN, 55402 United States	Electronic Service		No	24-221M-24-221
64	Elizabeth	Schmiesing	eschmiesing@winthrop.com	Winthrop & Weinstine, P.A.		225 South Sixth Street Suite 3500 Minneapolis MN, 55402 United States	Electronic Service		No	24-221M-24-221
65	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	24-221M-24-221

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66	Christine	Schwartz	regulatory.records@xcelenergy.com	Xcel Energy		414 Nicollet Mall, MN1180-07-MCA Minneapolis MN, 55401-1993 United States	Electronic Service		Yes	24-221M-24-221
67	Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates		7400 Lyndale Ave S Ste 190 Richfield MN, 55423 United States	Electronic Service		No	24-221M-24-221
68	Joshua	Smith	joshua.smith@sierraclub.org			85 Second St FL 2 San Francisco CA, 94105 United States	Electronic Service		No	24-221M-24-221
69	Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.		76 W Kellogg Blvd St. Paul MN, 55102 United States	Electronic Service		No	24-221M-24-221
70	Beth	Soholt	bsoholt@cleangridalliance.org	Clean Grid Alliance		570 Asbury Street Suite 201 St. Paul MN, 55104 United States	Electronic Service		No	24-221M-24-221
71	Byron E.	Starns	byron.starns@stinson.com	STINSON LLP		50 S 6th St Ste 2600 Minneapolis MN, 55402 United States	Electronic Service		No	24-221M-24-221
72	Scott	Strand	sstrand@elpc.org	Environmental Law & Policy Center		60 S 6th Street Suite 2800 Minneapolis MN, 55402 United States	Electronic Service		No	24-221M-24-221
73	James M	Strommen	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered		150 S 5th St Ste 700 Minneapolis MN, 55402 United States	Electronic Service		No	24-221M-24-221
74	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	24-221M-24-221
75	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	24-221M-24-221
76	Joseph	Windler	jwindler@winthrop.com	Winthrop & Weinstine		225 South Sixth Street, Suite 3500 Minneapolis MN, 55402 United States	Electronic Service		No	24-221M-24-221
77	Kurt	Zimmerman	kwz@ibew160.org	Local Union #160, IBEW		2909 Anthony Ln St Anthony Village MN, 55418-3238 United States	Electronic Service		No	24-221M-24-221
78	Patrick	Zomer	pat.zomer@lawmoss.com	Moss & Barnett PA		150 S 5th St #1200 Minneapolis	Electronic Service		No	24-221M-24-221

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						MN, 55402 United States				

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
1	Kevin	Adams	kadams@caprw.org	Community Action Partnership of Ramsey & Washington Counties		450 Syndicate St N Ste 35 Saint Paul MN, 55104 United States	Electronic Service		No	M-25-277
2	Kristine	Anderson	kanderson@greatermngas.com	Greater Minnesota Gas, Inc.		1900 Cardinal Lane PO Box 798 Faribault MN, 55021 United States	Electronic Service		No	M-25-277
3	Sigurd W.	Anderson	mariner4anderson@gmail.com	Engineering Lab Design		30910 716th St Lake City MN, 55041 United States	Electronic Service		No	M-25-277
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	M-25-277
5	Mara	Ascheman	mara.k.ascheman@xcelenergy.com	Xcel Energy		414 Nicollet Mall Fl 5 Minneapolis MN, 55401 United States	Electronic Service		No	M-25-277
6	Gail	Baranko	gail.baranko@xcelenergy.com	Xcel Energy		414 Nicollet Mall 7th Floor Minneapolis MN, 55401 United States	Electronic Service		No	M-25-277
7	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-25-277
8	Barb	Bischoff	barb.bischoff@nngco.com	Northern Natural Gas Co.		CORP HQ, 714 1111 So. 103rd Street Omaha NE, 68124-1000 United States	Electronic Service		No	M-25-277
9	Elizabeth	Brama	ebrama@taftlaw.com	Taft Stettinius & Hollister LLP		2200 IDS Center 80 South 8th Street Minneapolis MN, 55402 United States	Electronic Service		No	M-25-277
10	Matthew	Brodin	mbrodin@allete.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	M-25-277
11	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-25-277
12	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-25-277
13	Robert S.	Carney, Jr.				4232 Colfax Ave. S.	Paper Service		No	M-25-277

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						Minneapolis MN, 55409 United States				
14	Olivia	Carroll	oliviac@cubminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota St W1360 St. Paul MN, 55101 United States	Electronic Service		No	M-25-277
15	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-25-277
16	John	Coffman	john@johncoffman.net	AARP		871 Tuxedo Blvd. St. Louis MO, 63119-2044 United States	Electronic Service		No	M-25-277
17	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-25-277
18	Brandon	Crawford	brandonc@cubminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota St Ste W1360 St. Paul MN, 55101 United States	Electronic Service		No	M-25-277
19	George	Crocker	gwillc@nawo.org	North American Water Office		5093 Keats Avenue Lake Elmo MN, 55042 United States	Electronic Service		No	M-25-277
20	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-25-277
21	Ian M.	Dobson	ian.m.dobson@xcelenergy.com	Xcel Energy		414 Nicollet Mall, 401-8 Minneapolis MN, 55401 United States	Electronic Service		No	M-25-277
22	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-25-277
23	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-25-277
24	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-25-277
25	Kristen	Eide Tollefson	healingsystems69@gmail.com	R-CURE		28477 N Lake Ave Frontenac MN, 55026-	Electronic Service		No	M-25-277

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27	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- 277
28	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- 277
29	Lucas	Franco	lfranco@liunagroc.com	LIUNA		81 Little Canada Rd E Little Canada MN, 55117 United States	Electronic Service		No	M-25- 277
30	Edward	Garvey	garveyed@aol.com	Residence		32 Lawton St Saint Paul MN, 55102 United States	Electronic Service		No	M-25- 277
31	Allen	Gleckner	agleckner@elpc.org	Environmental Law & Policy Center		35 E. Wacker Drive, Suite 1600 Suite 1600 Chicago IL, 60601 United States	Electronic Service		No	M-25- 277
32	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	M-25- 277
33	Thomas P.	Harlan	harlan@mdh-law.com	Madigan, Dahl & Harlan, P.A.		222 South Ninth Street Suite 3150 Minneapolis MN, 55402 United States	Electronic Service		No	M-25- 277
34	Matthew B	Harris	matt.b.harris@xcelenergy.com	XCEL ENERGY		401 Nicollet Mall FL 8 Minneapolis MN, 55401 United States	Electronic Service		No	M-25- 277
35	Shubha	Harris	shubha.m.harris@xcelenergy.com	Xcel Energy		414 Nicollet Mall, 401 - FL 8 Minneapolis MN, 55401 United States	Electronic Service		No	M-25- 277
36	Amber	Hedlund	amber.r.hedlund@xcelenergy.com	Northern States Power Company dba Xcel Energy- Elec		414 Nicollet Mall, 401-7 Minneapolis MN, 55401 United States	Electronic Service		No	M-25- 277
37	Adam	Heinen	aheinen@dakotaelectric.com	Dakota Electric Association		4300 220th St W Farmington MN, 55024 United States	Electronic Service		No	M-25- 277
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72	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-25-277
73	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-25-277
74	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-25-277
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