Xcel Energy

414 Nicollet Mall
Minneapolis, MN 55401

June 13, 2022

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

—Via Electronic Filing—

RE: REPLY COMMENTS
2022 GAS UTILITY INFRASTRUCTURE COST RIDER
DOCKET NO. G002/M-21-765

Dear Mr. Seuffert:

Northern States Power Company, doing business as Xcel Energy, submits to the Minnesota Public Utilities Commission the enclosed Reply to the May 31, 2022 Comments of the Department of Commerce, Division of Energy Resources and Fresh Energy regarding our 2022 Gas Utility Infrastructure Cost Rider Petition filed October 29, 2021 in the above-noted docket.

We have electronically filed this document with the Minnesota Public Utilities Commission, and copies have been served on the parties on the attached service list. If you have any questions regarding this filing, please contact Brandon Kirschner at (612) 215-5361 or brandon.m.kirschner@xcelenergy.com or Mary Martinka at (612) 330-6737 or mary.a.martinka@xcelenergy.com.

SINCERELY,

/s/

LISA R. PETERSON
MANAGER, REGULATORY ANALYSIS

Attachments

c: Service List

STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION

Katie Sieben	Chair
Joseph K. Sullivan	Vice-Chair
Valerie Means	Commissioner
Matt Schuerger	Commissioner
John Tuma	Commissioner

IN THE MATTER OF THE PETITION OF NORTHERN STATES POWER COMPANY FOR APPROVAL OF A GAS UTILITY INFRASTRUCTURE COST RIDER TRUE-UP REPORT FOR 2020, UPDATED COSTS FOR 2021, REVENUE REQUIREMENTS FOR 2022, AND REVISED ADJUSTMENT FACTORS

DOCKET NO. G002/M-21-765

REPLY COMMENTS

INTRODUCTION

Northern States Power Company, doing business as Xcel Energy, submits to the Minnesota Public Utilities Commission (Commission) this Reply to the May 31, 2022 Comments of the Minnesota Department of Commerce, Division of Energy Resources (Department) and Fresh Energy. We appreciate the parties' thorough review of our 2022 Gas Utility Infrastructure Cost (GUIC) Rider Petition (Petition) filed October 29, 2021 in the present docket.

In this Reply, we start by discussing our revised 2022 revenue requirement request in light of the Department's recommendations and the Company's filing of its natural gas rate request and the Commission's implementation of interim rates. After that, we provide responses to certain issues raised by the parties. The topics we will discuss include:

- Internal Capitalized Costs
- Risk Assessments
- Revenue Requirement Apportionment
- Aligning GUIC Rider with Final Gas Rate Case Decision
- Plan to Wind Down GUIC Rider

Beyond these topics, we confirm that we will provide a compliance filing within ten days of a Commission Order with a preliminary calculation of our GUIC Rider rate factors, along with a final rate compliance filing after all 2022 actual data is known.

REPLY

A. Adjusted Revenue Requirement Request

We appreciate the Department's careful review of our Petition, and we respond to the adjustments and comments raised in their initial comments. With this Reply we are making four adjustments to our initial revenue requirement request. First, we have quantified the impact of removing the H005 and Rahr Lateral IP Line projects from our revenue requirement request, as noted by the Department. These projects will no longer be taking place in 2022 and together reduce the revenue requirement by approximately $126,000.

Second, we make changes to our revenue requirement request to remove the GUIC Retirement Revenue Credits adjustment and the adjustment to remove amounts recovered in base rates. These adjustments are no longer needed due to new interim rates implemented January 1, 2022.[1] The GUIC Retirement Revenue Credits adjustment was accounting for the impact of assets retired through the GUIC that were being recovered in base rates starting in 2010. With interim rates in place essentially resetting the assets recovered through rates as of January 1, 2022, there are minimal, if any, assets retired by GUIC work currently being recovered through base/interim rates. Similarly, the adjustment to remove amounts recovered in our base rates from 2010 are no longer needed since all amounts collected in the GUIC Rider were removed from interim rates.[2] The removal of these adjustments increases our revenue requirement request. We noted this as a possibility in our initial proposal.[3]

With these updates, the Company requests recovery of approximately $28.8 million in projected transmission and distribution natural gas infrastructure investments and associated operation and maintenance costs for 2022. Table 1 below provides a summary of our updated 2022 revenue requirement request. This table is a modified version of the information shown in Attachment O of our initial filing, with the disallowances removed from our initially requested revenue requirement now shown in greater detail.[4] We also quantify the changes to our revenue requirement request discussed in this section.

The Department suggested that an adjustment was needed to remove the equity return on the TIMP Programmatic Replacement/MAOP Remediation project. However, a

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[1] Adjustments shown in Table 8 of our initial proposal. Recall that at the time of our initial filing in this proceeding, the Company had not filed its natural gas rate case, nor had the Commission acted on the Company's natural gas rate case interim rate request.
[2] Includes $480,000 in TIMP O&M costs and about $370,000 for costs related to mandatory relocations.
[3] *See* Page 33.
[4] These adjustments were also detailed in the attachments (Revenue Requirement Attachment, RIS – Reg Treatment tab) provided in response to Department Information Request No. 1.

$1.7 million adjustment to remove the equity return was already included in our initial request. Our final revenue requirement for 2022 will be adjusted to remove the equity return based on actual 2022 spend.

The Department also noted that an additional adjustment was needed to remove internal capitalized costs for 2022 projects. However, the removal of internal capitalized costs was included as a $4.5 million adjustment in our initial revenue requirement request. Our final revenue requirement for 2022 will be adjusted to remove all internal capitalized costs based on actual 2022 spend. Table 1 below shows this amount removed from our initial request.

Table 1
Adjusted 2022 Revenue Requirement Summary

Operations & Maintenance Expenses	$ 778,843
Capital-Related Revenue Requirement	34,600,354
Regulatory Treatment	
GUIC Retirement Revenue Credits	(815,408)
Revenue Requirement in Base Rates	(846,937)
Other Disallowances	
2018-2021 Internal Capitalized Costs	(4,083,539)
2022 Internal Capitalized Costs	(439,164)
Removal of Low-risk Infrastructure Costs	(38,560)
Prog. Repl./MAOP Projects Limited to LT Debt Rate	(1,712,106)
Other Project Overrun Disallowances	(162,854)
Total Other Disallowances	(6,436,223)
Revenue Requirement as Filed	**$27,280,630**
Reply Comment Adjustments	
Remove Rahr Lateral Indirect Survey Costs	(46,000)
Remove H005 Replacement Expenditures	(79,646)
Remove GUIC Retirement Revenue Adjustment	846,937
Remove Recovery in Base Rates Adjustment	815,408
Total Reply Comment Adjustments	1,536,699
Adjusted 2022 Revenue Requirement	**$28,817,329**

B. Internal Capitalized Costs

The Department has recommended that the Company make an adjustment to remove internal capitalized costs from our 2022 GUIC project costs. However, as we stated previously, we do not believe an additional adjustment is needed, as we have already included adjustments to remove the internal capitalized costs for our GUIC projects from 2018 through 2022; $4.1 million for our projects from 2018 through 2021[5] and $0.4 million for 2022 projects. These adjustments were reflected in Table 8 of our initial filing and are also shown under the other disallowances in Table 1 above.

We believe that the Department's confusion on this issue comes from a difference in how we discuss and account for internal capitalized costs when we report our capital costs versus our revenue requirement calculations in our initial filing. We did not remove internal capitalized costs, other than internal labor, from the estimated capitalized costs for our 2022 projects. We do not forecast our capital costs at a level of detail that includes granular information about the amount of overhead, transportation, and other costs. That level of detail is not available until actual expenditures occur. To not introduce another level of uncertainty into our reported forecasts, we report our 2022 capital costs with an adjustment to remove an estimate of internal labor but no adjustments to remove overheads, transportation, and other costs.

That said, to not overstate our initial 2022 revenue requirement request and to fully comply with the Commission's previous orders, for the purposes of this filing, we make an adjustment to remove the estimated impact of internal capitalized costs for 2022 projects. The adjustment we make is based on an estimate of the impact of internal capitalized costs from previous years. This year that estimate was about $0.4 million. As stated above, this was shown in Table 8 of our initial filing.[6]

We attempted to make this distinction clear when discussing the revenue requirement and capital cost estimates, but we can understand how there may have been some confusion. We will make this clearer in future GUIC filings to ensure readers are certain of how internal capitalized costs are treated in our requests.

C. Risk Assessments

The Department requested clarification on two of our project risk assessments shown in Attachment D2(b) of our initial filing, J-DIMP Mitigated Risk/Foot priority scores and TIMP MAOP project risk assessment. Below we discuss each of these two risk assessments.

1. *J-DIMP Mitigated Risk/Foot Priority Scores*

The risk scores calculated for the J-DIMP Mitigated Risk/Foot priority scores are used to prioritize the work based on assessed risk. These calculations are unitless and only intended for comparing pipeline projects for potential replacement. Annual

[5] This adjustment is part of the Prior-Year Disallowances for the 2022 forecast revenue requirement in Table 8.
[6] These adjustments were also detailed in the attachments (Revenue Requirement Attachment, RIS – Reg Treatment tab) provided in response to Department Information Request No. 1.

updates to the companies J-DIMP risk model factors resulted in lower scores across the entire gas distribution system.

The Company continues to focus on replacement of its highest risk assets. Despite the changes in scores from 2020 to 2021, the Company still identified a similar portion of the asset base as medium and high risk. Approximately one percent of our main milage was identified as high risk and two percent was identified as medium risk in both years. Table 2 below shows these details for 2021 projects and Table 3 shows the details for 2020 projects.

Table 2
2021 J-DIMP Projects Risk Assessment

Risk Reduction Category	Project Risk Scores Range (Mitigated Risk/Foot)	Number of J-DIMP™ Projects Currently Identified as of April 2021	Percentage	Main Mileage Currently Identified as of April 2021	Percentage
High	Score > 1.18	1,255	2%	95	1%
Medium	0.6695 ≤ Score ≤ 1.18	2,420	5%	216	2%
Low	0 ≤ Score ≤ 0.6695	46,686	93%	9,134	97%
Total	**All**	**50,361**	**100%**	**9,445**	**100%**

Table 3
2020 J-DIMP Projects Risk Assessment

Risk Reduction Category	Project Risk Scores Range (Mitigated Risk/Foot)	Number of J-DIMP™ Projects Currently Identified as of September 2019	Percentage	Main Mileage Currently Identified as of September 2019	Percentage
High	Score > 10	1,968	5%	111	1%
Medium	7 ≤ Score ≤ 10	1,450	4%	198	2%
Low	0 < Score < 7	34,686	91%	8,957	97%
Total	**All**	**38,104**	**100%**	**9,266**	**100%**

2. *TIMP MAOP Project Risk Assessment*

The Company changed the TIMP MAOP project risk categories from high, medium, low, and no risk to high, low, and no risk to align the risk categories with the MAOP remediation requirements of Code of Federal Regulations 49 Part 192.624, published in October 2019. The high risk category aligns with the prescriptive federal code requirements for MAOP remediation. The low risk category aligns with those assets with Traceable, Verifiable, and Complete (TVC) pressure test records but without TVC material records. Assets identified as no risk have TVC pressure test and material records. The medium risk category no longer aligns with the prescriptive nature of the federal code requirements and was removed for that reason.

D. Revenue Requirement Apportionment

The Company provides clarifying information on our proposal to update the GUIC Rider revenue requirement apportionment, to show that our proposed apportionment is consistent with that ordered in our last approved rate case in Docket No. G002/GR-09-1153 (2010 Rate Case).

The Order in the 2010 Rate Case adopted the following language for the Administrative Law Judge's (ALJ) Finding of Fact 310:[7]

> If the Commission determines that a lower revenue requirement than Xcel's requested $9.924 million is appropriate, the approved revenue requirement should be apportioned according to the percentages shown in the table "Summary of NSPM's Proposed Revenue Apportionment" above as a guide. The Company shall in its compliance filing provide a proposed class allocation that holds the revenue from the negotiated transportation and generation transportation classes constant and include the five rate design features referenced in subparagraphs (a) through (e) immediately above.

We note two items in this Finding of Fact that are relevant to our GUIC apportionment proposal. The first is that one of the "five rate design features referenced in subparagraphs (a) through (e)" in the ALJ Finding approved by the Commission is the following: **the Demand and Distribution Charges for sales service should be the same as the corresponding transportation service.**[8] This supports the Company's rate design goal of being indifferent to a customer's choice of sales service or transportation service.

The second relevant item from Finding of Fact 310 is the use of the table "Summary of NSPM's Proposed Revenue Apportionment" as a guide to apportionment in the case. The applicable column from the referenced summary of proposed revenue

[7] Page 38 of December 6, 2010 FINDINGS OF FACT, CONCLUSIONS OF LAW, AND ORDER in Docket No. G002/GR-09-1153.
[8] Finding of Fact 309 part C of SUMMARY OF TESTIMONY AT THE PUBLIC HEARINGS, FINDINGS OF FACT, CONCLUSIONS AND RECOMMENDATIONS filed October 15, 2010, Docket No. G002/GR-09-1153.

apportionment[9] is shown below along with the Company's approved apportionment for the 2010 Rate Case. These apportionments include 13 separate rate classes. Table 4 below provides a summary of the revenue apportionment from that rate case.

Table 4
Summary of 2021 Rate Case Revenue Apportionment

	Proposed Apportionment: to be used as a Guide	Approved Revenue	Approved Apportionment
Residential	68.09%	$108,021,110	67.2244%
Small Commercial	10.36%	$16,709,593	10.3988%
Large Commercial	10.59%	$17,452,122	10.8609%
Small Comml Demand Billed	0.13%	$210,302	0.1309%
Large Comml Demand Billed	1.93%	$3,165,732	1.9701%
Small Interruptible	2.28%	$3,707,767	2.3074%
Medium Interruptible	2.00%	$3,606,188	2.2442%
Large Interruptible	0.77%	$1,538,180	0.9572%
Firm Transportation	0.23%	$383,885	0.2389%
Interruptible Transportation	0.15%	$235,613	0.1466%
Negotiated Transportation	0.59%	$1,015,917	0.6322%
Generation System	0.13%	$230,093	0.1432%
Generation Transportation	2.76%	$4,410,960	2.7451%
Total Retail	**100.00%**	**$160,687,462**	**100.0000%**

Both the currently approved GUIC Rider apportionment and the Company's proposed GUIC Rider apportionment in this docket are sourced from the Company's approved revenue apportionment established in the 2010 Rate Case, as shown in Attachment A of this Reply. In the currently approved GUIC apportionment, the 13 rate classes are grouped into five major classes. In the proposed GUIC apportionment, the approved apportionment percentages for the 13 rate classes are grouped into four major classes, while preserving the rate design goal of being indifferent to a customer's choice of sales service or transportation service. Table 5 below is an example of the 2022 GUIC Rider rates for Medium Interruptible and Medium Interruptible Transportation Service under the current and proposed GUIC Rider apportionment.

[9] Finding of Fact 265 of SUMMARY OF TESTIMONY AT THE PUBLIC HEARINGS, FINDINGS OF FACT, CONCLUSIONS AND RECOMMENDATIONS filed October 15, 2010, Docket No. G-002/GR-09-1153.

Table 5
Current and Proposed Apportionment
Medium Interruptible Transportation Service

	Sales Service	Transportation Service
Distribution Charge	$0.044978	$0.044978
GUIC Rider Charge - current apportionment	$0.017017	$0.002324
GUIC Rider Charge - proposed apportionment	$0.011685	$0.011685

In the Company's current rate case, we have proposed to incorporate a portion of the GUIC Rider investment into proposed base rates. To do this and keep rates uniform between transportation service and sales service classes, it was necessary to propose a larger revenue increase to the transportation service classes than the sales service classes. The transportation service distribution rates need to be increased more to account for the gap in GUIC Rider rates compared to the sales service classes. Our rate case proposed apportionment is consistent with the apportionment proposed in the GUIC, where the transportation service rates would be increased by a greater amount to cover the gap in GUIC Rider recovery caused by separating transportation into their own major GUIC Rider class. While the class percentages of our proposed revenue apportionment are not an exact match between our rate case and GUIC Rider, the approach in the two dockets is the same. We note that in the GUIC Rider, we are using the approved apportionment from our 2010 Rate Case, and therefore the class apportionment would not be an exact match to the revenue apportionment proposal in our current rate case.

The Company continues to support the GUIC Rider revenue apportionment we proposed in our initial Petition in this docket. The proposal preserves the rate design goal of being indifferent to a customer's choice of sales service or transportation service and is consistent with the apportionment approach in our gas rate case currently before the Commission.

E. Aligning GUIC Rider with Final Gas Rate Case Decision

The Department noted that certain costs within the GUIC Rider will be rolled into base rates at the conclusion of the Company's current rate case, and that rider collection of these costs would discontinue effective with the implementation of final rates. We provide clarification of the timing of the GUIC Rider roll-in and corresponding GUIC Rider rate reduction here.

The Company proposed to move (or "roll-in") part of the revenue requirements for the GUIC Rider to base rates when final base rates are implemented in the current rate case. This proposed rider roll-in includes the revenue requirement for all GUIC Rider capital projects forecasted to be in service prior to December 31, 2021. The Company's rate case interim rate revenues collected from January 1, 2022 through the effective date of final rates in 2023 do not include recovery of any part of the 2022 GUIC revenue requirement. Therefore, the 2022 GUIC Rider revenue requirement for January 1, 2022 through the time of final rate implementation will be collected in the GUIC Rider. Recovery of the ongoing revenue requirement for the GUIC Rider roll-in will begin in base rates at the time final rates are effective sometime in 2023.

The recovery of the GUIC Rider revenue requirement is delayed 14 months from the start of the rider year, as shown in Table 6 below.

Table 6
Collection Periods for GUIC Rider Years

GUIC Rider Year	Collection Period
2017	April 2017-Feb 2019
2018	March 2019-Feb 2020
2019	March 2020-Feb 2021
2020	March 2021-Feb 2022
2021	March 2022-Feb 2023
2022	March 2023-Feb 2024

The 2022 GUIC revenue requirement request will be recovered starting March 1, 2023. At the time final rate implementation occurs in the rate case sometime in 2023, the GUIC Rider rates will still be collecting the 2022 GUIC Rider revenue requirement that was not collected through interim rates in the current case. Since the GUIC Rider roll-in will occur during 2023, the corresponding adjustment to GUIC Rider rates will occur for 2023 GUIC Rider revenue requirements. Recovery for the 2023 GUIC Rider revenue requirement runs from March 1, 2024 through February 28, 2025, so we would incorporate the reduction for the rider roll-in starting March 1, 2024. As this gets implemented, the Company will make its best efforts to help document this complicated roll-in in a manner understandable to stakeholders.

F. Plan to Wind Down GUIC Rider

We appreciate Fresh Energy's interest in the decarbonatization of the natural gas system and reducing greenhouse gases. The Company shares this interest, announcing a net-zero vision for natural gas late last year and actively participating in the Commission's recent Natural Gas Innovation Act (NGIA) docket. However, decarbonization and greenhouse gas reduction efforts do not eliminate the need to invest in our system as it exists to ensure that we can safely and reliably serve our existing customers. Under Minn. Stat. § 216B.1635, subdiv. 1, recoverable gas utility infrastructure costs are limited to (1) replacement of natural gas facilities located in the public right of way required by construction or improvement of public work done by a municipality or (2) replacement or modification of existing natural gas facilities required by a federal or state agency. Based on this definition, the costs the Company includes in the GUIC relate to projects that promote safety and reliability, to ensure that our system meets all federal and state requirements, and completing work requested by federal and state agencies. As further required by Minn. Stat. § 216B.1635, GUIC costs do not include betterments of the Company's natural gas system. Instead, they are focused on maintaining the existing gas system.

Therefore, the Company does not support Fresh Energy's request for a "wind-down plan." Fresh Energy's proposal is both unnecessary (seeking information already required to be included in the GUIC, such as timelines and in-service dates for current GUIC projects)[10] and incompatible with the GUIC (for example, requesting discussions of alternatives to replacement projects when the only projects recoverable under the GUIC are those *required* by a municipality or a federal or state agency).

The GUIC has been an effective tool in helping the Company to avoid the need to file natural gas rate cases in the past. While we share an interest in the policies Fresh Energy is pursuing, we respectfully suggest the GUIC simply is not the appropriate place for these discussions. Instead, as we look to the future and the possibility that the enabling legislation for the GUIC may expire mid-2023, we think a better discussion to have in the context of next year's GUIC Rider filing is whether and how to continue this specific recovery tool for these types of important natural gas investments.[11]

That said, the Company supports taking stock of the future of gas investments considering goals of decarbonization and electrification. The Company actively participated in the NGIA docket and plans to participate in the Future of Natural Gas docket[12] once it kicks off in earnest, but we believe discussions about decarbonization and electrification should be a more holistic effort (and are better addressed in the before-mentioned dockets) since they address issues well beyond the substance of the GUIC Rider dockets.

[10] Information is included in the Petition's project detail schedules, Attachments C and C1 for TIMP and Attachments D and D1 for DIMP and mandatory relocation projects.
[11] It is worth noting that the Commission continued to authorize recovery through the State Energy Policy Rider after the enabling legislation for that rider was removed from statute.
[12] Docket No. G999/CI-21-565.

CONCLUSION

We respectfully request that the Commission, consistent with its previous Orders, grant recovery of the Company's gas utility infrastructure costs through a GUIC Rider and approve our revised proposed 2022 GUIC Rider factors.

Dated: June 13, 2022

Northern States Power Company

Comparison of Current and Proposed GUIC Apportionment

	09-1153 Revenue	GUIC Current Apportionment	09-1153 Revenue	GUIC Proposed Apportionment
Residential	108,021,110	67.2244%	$108,021,110	67.2244%
Total Residential	$108,021,110	67.2244%	$108,021,110	67.2244%
Small Commercial	$16,709,593	10.3988%	$16,709,593	10.3988%
Large Commercial	$17,452,122	10.8609%	$17,452,122	10.8609%
Total Commercial Firm	$34,161,715	21.2597%	$34,161,715	21.2597%
Small Commercial Demand Billed	$210,302	0.1309%	$210,302	0.1309%
Large Commercial Demand Billed	$3,165,732	1.9701%	$3,165,732	1.9701%
Firm Transport			$383,885	0.2389%
Negotiated Transport			$1,015,917	0.6322%
Generation Transport			$4,410,960	2.7451%
Total Demand Billed	$3,376,034	2.1010%	$9,186,796	5.7172%
Small Interruptible	$3,707,767	2.3074%	$3,707,767	2.3074%
Medium Interruptible	$3,606,188	2.2442%	$3,606,188	2.2442%
Large Interruptible	$1,538,180	0.9572%	$1,538,180	0.9572%
Generation - Retail	$230,093	0.1432%	$230,093	0.1432%
Interruptible Transport			$235,613	0.1466%
Total Interruptible	$9,082,228	5.6521%	$9,317,841	5.7987%
Firm Transport	$383,885	0.2389%		
Interruptible Transport	$235,613	0.1466%		
Negotiated Transport	$1,015,917	0.6322%		
Generation Transport	$4,410,960	2.7451%		
Total Transport	$6,046,375	3.7628%		
Total	$160,687,462	100.0000%	$160,687,462	100.0000%

CERTIFICATE OF SERVICE

I, Mustafa Adam, hereby certify that I have this day served copies or summaries of the foregoing documents on the attached list(s) of persons.

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

xx electronic filing

Docket No. G002/M-21-765

Dated this 13th day of June 2022

/s/

____
Mustafa Adam
Regulatory Administrator

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David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency	220 South Sixth Street Suite 1300 Minneapolis, Minnesota 55402	Electronic Service	No	OFF_SL_21-765_M-21-765
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_21-765_M-21-765
Amanda	Rome	amanda.rome@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 5 Minneapoli, MN 55401	Electronic Service	No	OFF_SL_21-765_M-21-765
Richard	Savelkoul	rsavelkoul@martinsquires.com	Martin & Squires, P.A.	332 Minnesota Street Ste W2750 St. Paul, MN 55101	Electronic Service	No	OFF_SL_21-765_M-21-765
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th Pl E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-765_M-21-765
James M	Strommen	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered	150 S 5th St Ste 700 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-765_M-21-765

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Lynnette	Sweet	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	Yes	OFF_SL_21-765_M-21-765