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April 16, 2025

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

Re: *In the Matter of a Peak Time Rebate Program for Northern States Power Co. d/b/a Xcel Energy to Further the Commission's Advanced Rate Design Efforts in Docket No. E002/CI-24-115*
Docket No. E-002/M-24-432

Dear Mr. Seuffert:

The Office of the Attorney General – Residential Utilities Division (OAG) submits this letter in response to the Commission's April 2, 2025 Notice of Comment Period regarding the regulatory pathway for reviewing Xcel's peak-time-rebate proposal.

In Xcel's pending rate case, the OAG recommended that the Commission evaluate the peak-time rebate through that contested-case process,¹ while Xcel advocated for including the rebate in its Energy Conservation and Optimization (ECO) plan overseen by the Minnesota Department of Commerce. The Commission did not adopt either recommendation. Instead, the Commission found that "development, review, and approval of a peak-time rebate program will, at this point, occur most effectively in a new, separate docket rather than through the contested case process in this general rate case."² The Commission directed its Staff to open a docket to evaluate a peak-time-rebate proposal, which Xcel was to file by March 17, 2025.³

The OAG continues to believe that Xcel's proposed peak-time rebate meets the statutory definition of a "rate" and must be approved by the Commission.⁴ Since evaluation of the rebate will not occur in Xcel's pending rate case, it should instead occur in this docket, which the Commission opened for that purpose. Evaluating the rebate in this docket is the regulatory pathway most consistent with Minnesota law, regulatory efficiency, and the public interest.

¹ See Docket No. E-002/GR-24-320, [OAG Reply Comments](#) (Nov. 18, 2024).

² Docket No. E-002/GR-24-320, Notice of and Order for Hearing at 4 (Dec. 30, 2024).

³ *Id.* at 8.

⁴ See [OAG Reply Comments](#) at 3–4.

In its proposal, Xcel continues to advocate for the rebate to be evaluated through the ECO process.⁵ Xcel argues that the peak-time rebate should be included in its ECO plan because the rebate meets the definition of “load management” under Minn. Stat. § 216B.2402: “an activity, service, or technology that changes the timing or the efficiency of a customer’s use of energy that allows a utility or a customer to: (1) respond to local and regional energy system conditions; or (2) reduce peak demand for electricity or natural gas.”⁶

Under Xcel’s reading of the ECO statute, there is overlap between the Department’s authority over load management and the Commission’s authority over rates: If Xcel’s peak-time rebate is an “activity” or “service” that changes the timing of customers’ energy use, so would be any rate that includes a price signal to change the timing of customers’ energy use, such as time-of-use rates or critical-peak pricing.

Due to this overlap between Commission and Department authority, Xcel’s proposal to refer the rebate to the Department would lead to a suboptimal process. Under Xcel’s proposal, the peak-time rebate would, initially, be evaluated by the Department. But the Commission would still have a duty to ensure that the rebate “rate” was just and reasonable before it could be applied to customer bills.⁷ The Commission would also need to ensure that the rebate was not unduly discriminatory, that it encouraged energy conservation to the maximum reasonable extent,⁸ and that it considered the public’s need for adequate, efficient, and reasonable service,⁹ resolving all doubt in favor of ratepayers.¹⁰

Processing the rebate proposal through ECO risks wasted effort because the standard that the Department applies to ECO plans differs from the standard the Commission applies to rates.¹¹ In addition, parties would have to participate in an ECO process knowing that the Commission could ultimately reject or modify whatever rebate the Department approved. A two-step process would put added demands on agency and stakeholder resources, confuse stakeholders who are less familiar with regulatory processes, and discourage engagement with Xcel’s proposal.

The Commission is well equipped to evaluate the peak-time-rebate proposal without referring it to the ECO process. The Commission recently considered a time-of-use rate for Xcel—a rate which, under Xcel’s reading of the ECO statute, could also have been included in Xcel’s ECO plan as load management since it changes the timing of customers’ energy use. The Commission reviewed Xcel’s time-of-use rate proposal through a multi-round notice and comment proceeding, which allowed for many intervenors to investigate and evaluate Xcel’s proposal and

⁵ See Xcel Peak Time Rebate (PTR) Petition at 2 (Mar. 17, 2025).

⁶ Minn. Stat. § 216B.2402, subd. 15.

⁷ See Minn. Stat. § 216B.03.

⁸ *Id.*

⁹ Minn. Stat. § 216B.16, subd. 6.

¹⁰ Minn. Stat. §§ 216B.03, .16, subd. 4.

¹¹ See Minn. Stat. § 216B.241, subds. 2 (providing that the Department “shall evaluate the plan on the basis of cost-effectiveness and the reliability of technologies employed”); 13 (providing that the Department may approve a load-management program if “the program is cost-effective, considering the costs and benefits to ratepayers, the utility, participants, and society”).

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for public commenters to weigh in.¹² Over the course of the proceeding, Xcel voluntarily modified its proposal in response to parties' and the public's concerns in ways that the Commission ultimately adopted. The time-of-use proceeding demonstrates that the Commission is more than capable of running a robust process to evaluate rate-design issues like those implicated by Xcel's peak-time rebate proposal.

Xcel's ratepayers are paying substantial costs for the utility's investments in advanced metering infrastructure, and it is critical that the Commission hold Xcel accountable for delivering the promised benefits of this technology, including advanced rates. The best way for the Commission to do that is to maintain jurisdiction over Xcel's peak-time-rebate proposal and to evaluate it in this docket.

Sincerely,

/s/ **Peter G. Scholtz**

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¹² See generally Docket No. E-002/M-23-452.

CERTIFICATE OF SERVICE

**Re: *In the Matter of a Peak Time Rebate Program for Northern States Power Co.
d/b/a Xcel Energy to Further the Commission's Advanced Rate Design Efforts in
Docket No. E002/CI-24-115
Docket No. E-002/M-24-432***

I, JUDY SIGAL, hereby certify that on the 16th day of April, 2025, I e-filed with eDockets *Comments of the Minnesota Office of The Attorney General—Residential Utilities Division* and served a true and correct copy of the same upon all parties listed on the attached service list by e-mail, electronic submission, and/or United States Mail with postage prepaid, and deposited the same in a U.S. Post Office mail receptacle in the City of St. Paul, Minnesota.

/s/ Judy Sigal
JUDY SIGAL

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111	MJ	Horner	mj.horner@xcelenergy.com			null null, null United States	Electronic Service		No	Official 24-432
112	Samantha	Houston	shouston@ucsusa.org	Union of Concerned Scientists		1825 K St. NW Ste 800 Washington DC, 20006 United States	Electronic Service		No	Official 24-432
113	Lori	Hoyum	lhoyum@mnpower.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	Official 24-432
114	Jan	Hubbard	jan.hubbard@comcast.net			7730 Mississippi Lane Brooklyn Park MN, 55444 United States	Electronic Service		No	Official 24-432
115	Holmes	Hummel	holmes.hummel@cleanenergyworks.org	Clean Energy Works		925 French St NW Washington DC, 20001 United States	Electronic Service		No	Official 24-432
116	Geoffrey	Inge	ginge@regintl.com	Regulatory Intelligence LLC		PO Box 270636 Superior CO, 80027-9998 United States	Electronic Service		No	Official 24-432
117	Casey	Jacobson	cjacobson@bepc.com	Basin Electric Power Cooperative		1717 East Interstate Avenue Bismarck ND, 58501 United States	Electronic Service		No	Official 24-432
118	Travis	Jacobson	travis.jacobson@mdu.com	Great Plains Natural Gas Company		400 N 4th St Bismarck ND, 58501 United States	Electronic Service		No	Official 24-432
119	John S.	Jaffray	jjaffray@jjrpower.com	JJR Power		350 Highway 7 Suite 236 Excelsior MN, 55331 United States	Electronic Service		No	Official 24-432
120	Alan	Jenkins	aj@jenkinsatlaw.com	Jenkins at Law		2950 Yellowtail Ave. Marathon FL, 33050 United States	Electronic Service		No	Official 24-432
121	Andrea	Jenkins	andrea.jenkins@minneapolismn.gov	Minneapolis City of Lakes		350 S 5th St Room 307 Minneapolis MN, 55415 United States	Electronic Service		No	Official 24-432
122	Richard	Johnson	rick.johnson@lawmoss.com	Moss & Barnett		150 S. 5th Street Suite 1200	Electronic Service		No	Official 24-432

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						Minneapolis MN, 55402 United States				
123	Sarah	Johnson Phillips	sjphillips@stoel.com	Stoel Rives LLP		33 South Sixth Street Suite 4200 Minneapolis MN, 55402 United States	Electronic Service		No	Official 24-432
124	Nate	Jones	njones@hcpd.com	Heartland Consumers Power		PO Box 248 Madison SD, 57042 United States	Electronic Service		No	Official 24-432
125	Philip	Jones	phil@philjonesconsulting.com	Alliance for Transportation Electrification		1402 3rd Ave Ste 1315 Seattle WA, 98101 United States	Electronic Service		No	Official 24-432
126	Brendan	Jordan	bjordan@gpisd.net	Great Plains Institute & Bioeconomy Coalition of MN		2801 21st Ave S Ste 220 Minneapolis MN, 55407 United States	Electronic Service		No	Official 24-432
127	Bina	Joshi	bina.joshi@afslaw.com	ArentFox Schiff LLP		233 S Wacker Dr Ste 7100 Chicago IL, 60606 United States	Electronic Service		No	Official 24-432
128	Dan	Juhl	in.another.account.info@juhlenergy.com	Juhl Energy Inc.		1502 17th St SE Pipestone MN, 56164 United States	Paper Service		No	Official 24-432
129	Mahmoud	Kabalan	mahmoud.kabalan@stthomas.edu	University of St Thomas		2115 Summit Ave. Mail OSS100 School of Engineering Saint Paul MN, 55105 United States	Electronic Service		No	Official 24-432
130	Michael	Kampmeyer	mkampmeyer@a-e-group.com	AEG Group, LLC		260 Salem Church Road Sunfish Lake MN, 55118 United States	Electronic Service		No	Official 24-432
131	Nick	Kaneski	nick.kaneski@enbridge.com	Enbridge Energy Company, Inc.		11 East Superior St Ste 125 Duluth MN, 55802 United States	Electronic Service		No	Official 24-432
132	Stacey	Karels	skarels@local563.org	Mankato Area Bldg & Construction Trades Council		310 McKinzie St Mankato MN, 56001 United States	Electronic Service		No	Official 24-432
133	William	Kenworthy	will@votesolar.org			1 South Dearborn St Ste 2000 Chicago IL, 60603 United States	Electronic Service		No	Official 24-432
134	Samuel B.	Ketchum	sketchum@kennedy-graven.com	Kennedy & Graven, Chartered		150 S 5th St Ste 700 Minneapolis MN, 55402 United States	Electronic Service		No	Official 24-432
135	Chris	King	chris_king@siemens.com	Siemens		4000 E. Third Ave Suite 400 Foster City CA, 94404 United States	Electronic Service		No	Official 24-432

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
136	Frank	Kohlasch	frank.kohlasch@state.mn.us		Minnesota Pollution Control Agency	520 Lafayette Rd N. St. Paul MN, 55155 United States	Electronic Service		No	Official 24-432
137	Brian	Krambeer	bkrambeer@mienergy.coop	MiEnergy Cooperative		PO Box 626 31110 Cooperative Way Rushford MN, 55971 United States	Electronic Service		No	Official 24-432
138	Michael	Krause	michaelkrause61@yahoo.com			1200 Plymouth Avenue Minneapolis MN, 55411 United States	Electronic Service		No	Official 24-432
139	Michael	Krikava	mkrikava@taftlaw.com	Taft Stettinius & Hollister LLP		2200 IDS Center 80 S 8th St Minneapolis MN, 55402 United States	Electronic Service		No	Official 24-432
140	Nicolle	Kupser	nkupser@greatermngas.com	Greater Minnesota Gas, Inc.		1900 Cardinal Ln PO Box 798 Faribault MN, 55021 United States	Electronic Service		No	Official 24-432
141	Matthew	Lacey	mlacey@greenergy.com	Great River Energy		12300 Elm Creek Boulevard Maple Grove MN, 55369-4718 United States	Electronic Service		No	Official 24-432
142	Mary	LaGarde	mlagarde@maicnet.org	Minneapolis American Indian Center		1530 E Franklin Ave Minneapolis MN, 55404 United States	Electronic Service		No	Official 24-432
143	Holly	Lahd	holly.lahd@target.com	Target Corporation		33 South 6th St CC-28662 Minneapolis MN, 55402 United States	Electronic Service		No	Official 24-432
144	Carmel	Laney	carmel.laney@stoel.com	Stoel Rives LLP		33 South Sixth Street Suite 4200 Minneapolis MN, 55402 United States	Electronic Service		No	Official 24-432
145	James D.	Larson	james.larson@avantenergy.com	Avant Energy Services		220 S 6th St Ste 1300 Minneapolis MN, 55402 United States	Electronic Service		No	Official 24-432
146	Peder	Larson	plarson@larkinhoffman.com	Larkin Hoffman Daly & Lindgren, Ltd.		8300 Norman Center Drive Suite 1000 Bloomington MN, 55437 United States	Electronic Service		No	Official 24-432
147	Kevin	Lee	klee@bluegreenalliance.org	BlueGreen Alliance		2701 University Ave SE Ste. 209 Minneapolis MN, 55414 United States	Electronic Service		No	Official 24-432
148	Dean	Leischow	dean@sunrisenrg.com	Sunrise Energy Ventures		315 Manitoba Ave Ste 200 Wayzata MN, 55391 United States	Electronic Service		No	Official 24-432

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
149	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	Official 24-432
150	Ryan	Long	ryan.j.long@xcelenergy.com			414 Nicollet Mall 401 8th Floor Minneapolis MN, 55401 United States	Electronic Service		No	Official 24-432
151	Jason	Loos	jason.loos@centerpointenergy.com	CenterPoint Energy Resources Corp.		505 Nicollet Mall 3rd Floor Minneapolis MN, 55402 United States	Electronic Service		No	Official 24-432
152	Susan	Ludwig	sludwig@mnpower.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	Official 24-432
153	Alice	Madden	alice@communitypowermn.org	Community Power		2720 E 22nd St Minneapolis MN, 55406 United States	Electronic Service		No	Official 24-432
154	Kavita	Maini	kmmaini@wi.rr.com	KM Energy Consulting, LLC		961 N Lost Woods Rd Oconomowoc WI, 53066 United States	Electronic Service		No	Official 24-432
155	Emily	Marshall	emarshall@lourismarshall.com	Miller O'Brien Jensen, PA		120 S. 6th Street Suite 2400 Minneapolis MN, 55402 United States	Electronic Service		No	Official 24-432
156	Katherine	Marshall	katie.marshall@lawmoss.com	Moss & Barnett		150 S 5th St Ste 1200 Minneapolis MN, 55402 United States	Electronic Service		No	Official 24-432
157	Mary	Martinka	mary.a.martinka@xcelenergy.com	Xcel Energy Inc		414 Nicollet Mall 7th Floor Minneapolis MN, 55401 United States	Electronic Service		No	Official 24-432
158	Gregg	Mast	gmast@cleanenergyeconomymn.org	Clean Energy Economy Minnesota		4808 10th Avenue S Minneapolis MN, 55417 United States	Electronic Service		No	Official 24-432
159	Daryl	Maxwell	dmaxwell@hydro.mb.ca	Manitoba Hydro		360 Portage Ave FL 16 PO Box 815, Station Main Winnipeg MB, R3C 2P4 Canada	Electronic Service		No	Official 24-432
160	Erica	McConnell	emcconnell@elpc.org	Environmental Law & Policy Center		35 E. Wacker Drive, Suite 1600 Chicago IL, 60601 United States	Electronic Service		No	Official 24-432
161	Lilly B.	McKenna	lilly.mckenna@stoel.com	Stoel Rives LLP		One Montgomery St Ste 3230 San Francisco CA, 94104 United States	Electronic Service		No	Official 24-432

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
162	Taylor	McNair	taylor@gridlab.org			668 Capp Street San Francisco CA, 94110 United States	Electronic Service		No	Official 24-432
163	Sally Anne	McShane	sally.anne.mcshane@state.mn.us		Public Utilities Commission	121 7th Place E Suite 350 St. Paul MN, 55101 United States	Electronic Service		No	Official 24-432
164	Stephen	Melchionne	stephen.melchionne@ag.state.mn.us		Office of the Attorney General - Department of Commerce	445 Minnesota Street, Ste. 1400 St. Paul MN, 55101 United States	Electronic Service		No	Official 24-432
165	Thomas	Melone	thomas.melone@allcous.com	Minnesota Go Solar LLC		222 South 9th Street Suite 1600 Minneapolis MN, 55120 United States	Electronic Service		No	Official 24-432
166	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	Official 24-432
167	Peder	Mewis	pmewis@cleangridalliance.org	Clean Grid Alliance		570 Asbury St. St. Paul MN, 55104 United States	Electronic Service		No	Official 24-432
168	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	Official 24-432
169	Kevin	Miller	kevin.miller@chargepoint.com			254 E. Hacienda Avenue Campbell CA, 95008 United States	Electronic Service		No	Official 24-432
170	Stacy	Miller	stacy.miller@minneapolismn.gov	City of Minneapolis		350 S. 5th Street Room M 301 Minneapolis MN, 55415 United States	Electronic Service		No	Official 24-432
171	David	Moeller	dmoeller@allte.com	Minnesota Power			Electronic Service		No	Official 24-432
172	Marc	Monbouquette	marc.monbouquette@enel.com	Enel X North America, Inc.		846 Bransten Rd San Carlos CA, 94070 United States	Electronic Service		No	Official 24-432
173	Dalene	Monsebroten	dalene.monsebroten@nmpagency.com	Northern Municipal Power Agency		123 2nd St W Thief River Falls MN, 56701 United States	Electronic Service		No	Official 24-432
174	Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP		33 South Sixth St Ste 4200 Minneapolis MN, 55402 United States	Electronic Service		No	Official 24-432

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
175	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	Official 24-432
176	Evan	Mulholland	emulholland@mncenter.org	Minnesota Center for Environmental Advocacy		1919 University Ave W Ste 515 Saint Paul MN, 55101 United States	Electronic Service		No	Official 24-432
177	Alan	Muller	alan@greendel.org	Energy & Environmental Consulting		1110 West Avenue Red Wing MN, 55066 United States	Electronic Service		No	Official 24-432
178	Kristin	Munsch	kmunsch@citizensutilityboard.org	Citizens Utility Board of Minnesota		309 W. Washington St. Ste. 800 Chicago IL, 60606 United States	Electronic Service		No	Official 24-432
179	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	Official 24-432
180	Amanda	Myers	amanda@weavegrid.com	Weave Grid, Inc.		222 7th Street 2nd Floor San Francisco CA, 94103 United States	Electronic Service		No	Official 24-432
181	Mark	Nabong	mnabong@nrdc.org	Natural Resources Defense Council		20 N. Wacker Drive #1600 Chicago IL, 60606 United States	Electronic Service		No	Official 24-432
182	Ben	Nelson	benn@cmpasgroup.org	CMPMA		459 South Grove Street Blue Earth MN, 56013 United States	Electronic Service		No	Official 24-432
183	Carl	Nelson	cnelson@mncee.org	Center for Energy and Environment		212 3rd Ave N Ste 560 Minneapolis MN, 55401 United States	Electronic Service		No	Official 24-432
184	David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency		220 South Sixth Street Suite 1300 Minneapolis MN, 55402 United States	Electronic Service		No	Official 24-432
185	Sephra	Ninow	sephra.ninow@energycenter.org	Center for Sustainable Energy		426 17th Street, Suite 700 Oakland CA, 94612 United States	Electronic Service		No	Official 24-432
186	Michael	Noble	noble@fresh-energy.org	Fresh Energy		408 Saint Peter St Ste 350 Saint Paul MN, 55102 United States	Electronic Service		No	Official 24-432
187	Rolf	Nordstrom	rnordstrom@gpisd.net	Great Plains Institute		2801 21ST AVE S STE 220 Minneapolis MN, 55407-1229 United States	Electronic Service		No	Official 24-432

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
188	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	Official 24-432
189	Christian	Noyce	christian.noyce@state.mn.us		Public Utilities Commission	759 Hague Ave St Paul MN, 55104 United States	Electronic Service		No	Official 24-432
190	David	O'Brien	david.obrien@navigant.com	Navigant Consulting		77 South Bedford St Ste 400 Burlington MA, 01803 United States	Electronic Service		No	Official 24-432
191	M. William	O'Brien	bobrien@mojlaw.com	Miller O'Brien Jensen, P.A.		120 S 6th St Ste 2400 Minneapolis MN, 55402 United States	Electronic Service		No	Official 24-432
192	Ric	O'Connell	ric@gridlab.org	GridLab		2120 University Ave Berkeley CA, 94704 United States	Electronic Service		No	Official 24-432
193	Jeff	O'Neill	jeff.oneill@ci.monticello.mn.us	City of Monticello		505 Walnut Street Suite 1 Monticello MN, 55362 United States	Electronic Service		No	Official 24-432
194	Matthew	Olsen	molsen@otpc.com	Otter Tail Power Company		215 South Cascade Street Fergus Falls MN, 56537 United States	Electronic Service		No	Official 24-432
195	Russell	Olson	rolson@hcpd.com	Heartland Consumers Power District		PO Box 248 Madison SD, 57042-0248 United States	Electronic Service		No	Official 24-432
196	Debra	Opatz	dopatz@otpc.com	Otter Tail Power Company		215 South Cascade Street Fergus Falls MN, 56537 United States	Electronic Service		No	Official 24-432
197	Nate	O'Reilly	nate@iron512.com			851 Pierce Butler Route St Paul MN, 55104 United States	Electronic Service		No	Official 24-432
198	Carol A.	Overland	overland@legalelectric.org	Legalelectric - Overland Law Office		1110 West Avenue Red Wing MN, 55066 United States	Electronic Service		No	Official 24-432
199	John	Pacheco	johnpachecojr@gmail.com			null null, null United States	Electronic Service		No	Official 24-432
200	Greg	Palmer	gpalmer@greatermngas.com	Greater Minnesota Gas, Inc.		1900 Cardinal Ln PO Box 798 Faribault MN, 55021 United States	Electronic Service		No	Official 24-432
201	Jessica	Palmer Denig	jessica.palmer-denig@state.mn.us		Office of Administrative Hearings	600 Robert St N PO Box 64620 St. Paul MN, 55164 United States	Electronic Service		No	Official 24-432

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
202	Audrey	Partridge	audrey.peer@centerpointenergy.com	CenterPoint Energy Minnesota Gas		212 3rd Ave. N. Suite 560 Minneapolis MN, 55401 United States	Electronic Service		No	Official 24-432
203	Dan	Patry	dpatry@sunedison.com	SunEdison		600 Clipper Drive Belmont CA, 94002 United States	Electronic Service		No	Official 24-432
204	Jeffrey C	Paulson	jeff.jcplaw@comcast.net	Paulson Law Office, Ltd.		4445 W 77th Street Suite 224 Edina MN, 55435 United States	Electronic Service		No	Official 24-432
205	Jose	Perez	jose@hispanicsinenergy.com			1017 L Street #719 Sacramento CA, 95814 United States	Electronic Service		No	Official 24-432
206	Lisa	Perry	lisa.perry@walmart.com			2608 SE J St Bentonville AR, 72716 United States	Electronic Service		No	Official 24-432
207	Jennifer	Peterson	jjpeterson@mnpower.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	Official 24-432
208	Catherine	Phillips	catherine.phillips@wecenergygroup.com	Minnesota Energy Resources		231 West Michigan St Milwaukee WI, 53203 United States	Electronic Service		No	Official 24-432
209	Marcia	Podratz	mpodratz@mnpower.com	Minnesota Power		30 W Superior S Duluth MN, 55802 United States	Electronic Service		No	Official 24-432
210	Hannah	Polikov	hpolikov@aee.net	Advanced Energy Economy Institute		1000 Vermont Ave, Third Floor Washington DC, 20005 United States	Electronic Service		No	Official 24-432
211	J.	Porter	greg.porter@nngco.com	Northern Natural Gas Company		1111 South 103rd St Omaha NE, 68124 United States	Electronic Service		No	Official 24-432
212	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	Official 24-432
213	David G.	Prazak	dprazak@otpc.com	Otter Tail Power Company		P.O. Box 496 215 South Cascade Street Fergus Falls MN, 56538-0496 United States	Electronic Service		No	Official 24-432
214	Kenneth	Rance	krance@sabathani.org	Sabathani Community Center		310 East 38th St Rm #120 Minneapolis MN, 55409 United States	Electronic Service		No	Official 24-432
215	John C.	Reinhardt		Laura A. Reinhardt		3552 26th Ave S Minneapolis MN, 55406 United States	Paper Service		No	Official 24-432

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
216	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. Paul MN, 55101-2131 United States	Electronic Service		No	Official 24-432
217	Kevin	Reuther	kreuther@mncenter.org	MN Center for Environmental Advocacy		26 E Exchange St, Ste 206 St. Paul MN, 55101-1667 United States	Electronic Service		No	Official 24-432
218	John	Reynolds	john.reynolds@nfib.org			180 5th St E Suite 260 St. Paul MN, 55101 United States	Electronic Service		No	Official 24-432
219	Whitney	Richardson	whitney.richardson@evgo.com	EVgo Services, LLC		11835 W Olympic Blvd Ste 900E Los Angeles CA, 90064 United States	Electronic Service		No	Official 24-432
220	Noah	Roberts	nroberts@cleanpower.org	Energy Storage Association		1155 15th St NW, Ste 500 Washington DC, 20005 United States	Electronic Service		No	Official 24-432
221	Alice	RobertsDavis	admin.info@state.mn.us	Department of Administration		15 Sherburne Avenue St. Paul MN, 55155 United States	Electronic Service		No	Official 24-432
222	Susan	Romans	sromans@allete.com	Minnesota Power		30 West Superior Street Legal Dept Duulth MN, 55802 United States	Electronic Service		No	Official 24-432
223	Amanda	Rome	amanda.rome@xcelenergy.com	Xcel Energy		414 Nicollet Mall FL 5 Minneapolis MN, 55401 United States	Electronic Service		No	Official 24-432
224	Robert K.	Sahr	bsahr@eastriver.coop	East River Electric Power Cooperative		P.O. Box 227 Madison SD, 57042 United States	Electronic Service		No	Official 24-432
225	Renee	Samson	rsamson@freewiretech.com	FreeWire Technologies		1999 Harrison St Oakland CA, 94612 United States	Electronic Service		No	Official 24-432
226	Joseph L	Sathe	jsathe@kennedy-graven.com	Kennedy & Graven, Chartered		150 S 5th St Ste 700 Minneapolis MN, 55402 United States	Electronic Service		No	Official 24-432
227	Tim	Schaefer	thschaef@gmail.com	Environment MN		211 N 1st St Ste 480 Minneapolis MN, 55401 United States	Electronic Service		No	Official 24-432
228	Kevin	Schlangen	kevin.schlangen@co.dakota.mn.us	Dakota County		2800 160th Street West Rosemount MN, 55068 United States	Electronic Service		No	Official 24-432
229	Jacob J.	Schlesinger	jschlesinger@keyesfox.com	Keyes & Fox LLP		1580 Lincoln St Ste 880 Denver CO, 80203 United States	Electronic Service		No	Official 24-432

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
230	Elizabeth	Schmiesing	eschmiesing@winthrop.com	Winthrop & Weinstine, P.A.		225 South Sixth Street Suite 3500 Minneapolis MN, 55402 United States	Electronic Service		No	Official 24-432
231	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	Official 24-432
232	Kay	Schraeder	kschraeder@minnkota.com	Minnkota Power		5301 32nd Ave S Grand Forks ND, 58201 United States	Electronic Service		No	Official 24-432
233	Lori	Schultz	lorischultz@minncap.org	Minnesota Community Action Partnership		MCIT Building 100 Empire Dr Ste 202 St. Paul MN, 55103 United States	Electronic Service		No	Official 24-432
234	Christine	Schwartz	regulatory.records@xcelenergy.com	Xcel Energy		414 Nicollet Mall FL 7 Minneapolis MN, 55401-1993 United States	Electronic Service		No	Official 24-432
235	Doug	Scott	dscott@gpisd.net	Great Plains Institute		2801 21st Ave Ste 220 Minneapolis MN, 55407 United States	Electronic Service		No	Official 24-432
236	Dean	Sedgwick	sedgwick@itascapower.com	Itasca Power Company		PO Box 455 Spring Lake MN, 56680 United States	Electronic Service		No	Official 24-432
237	Maria	Seidler	maria.seidler@dom.com	Dominion Energy Technology		120 Tredegar Street Richmond VA, 23219 United States	Electronic Service		No	Official 24-432
238	Will	Seuffert	will.seuffert@state.mn.us		Public Utilities Commission	121 7th PI E Ste 350 Saint Paul MN, 55101 United States	Electronic Service		No	Official 24-432
239	Timothy	Sexton	timothy.sexton@state.mn.us		Minnesota Department of Transportation	395 John Ireland Blvd St. Paul MN, 55155-1899 United States	Electronic Service		No	Official 24-432
240	Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates		7400 Lyndale Ave S Ste 190 Richfield MN, 55423 United States	Electronic Service		No	Official 24-432
241	Patricia	Sharkey	psharkey@environmentallawcounsel.com	Midwest Cogeneration Association.		180 N LaSalle St Ste 3700 Chicago IL, 60601 United States	Electronic Service		No	Official 24-432
242	Bria	Shea	bria.e.shea@xcelenergy.com	Xcel Energy		414 Nicollet Mall Minneapolis MN, 55401 United States	Electronic Service		No	Official 24-432
243	Doug	Shoemaker	dougs@charter.net	Minnesota Renewable Energy		2928 5th Ave S Minneapolis MN, 55408 United States	Electronic Service		No	Official 24-432

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
244	Anne	Smart	anne.smart@chargepoint.com	ChargePoint, Inc.		254 E Hacienda Ave Campbell CA, 95008 United States	Electronic Service		No	Official 24-432
245	Amanda	Smith	amanda.smith@state.mn.us		Minnesota Pollution Control Agency	520 Lafayette Rd N St. Paul MN, 55155 United States	Electronic Service		No	Official 24-432
246	Beth	Smith	bsmith@gretermankato.com	Greater Mankato Growth		1961 Premier Dr Ste 100 Mankato MN, 56001 United States	Electronic Service		No	Official 24-432
247	Joshua	Smith	joshua.smith@sierraclub.org			85 Second St FL 2 San Francisco CA, 94105 United States	Electronic Service		No	Official 24-432
248	Ken	Smith	ken.smith@ever-greenenergy.com	Ever Green Energy		305 Saint Peter St Saint Paul MN, 55102 United States	Electronic Service		No	Official 24-432
249	Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.		76 W Kellogg Blvd St. Paul MN, 55102 United States	Electronic Service		No	Official 24-432
250	Trevor	Smith	trevor.smith@avantenergy.com	Avant Energy, Inc.		220 South Sixth Street Suite 1300 Minneapolis MN, 55402 United States	Electronic Service		No	Official 24-432
251	Beth	Soholt	bsoholt@cleangridalliance.org	Clean Grid Alliance		570 Asbury Street Suite 201 St. Paul MN, 55104 United States	Electronic Service		No	Official 24-432
252	Anna	Sommer	asommer@energyfuturesgroup.com	Energy Futures Group		PO Box 692 Canton NY, 13617 United States	Electronic Service		No	Official 24-432
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254	Mark	Spurr	mspurr@fvbenergy.com	International District Energy Association		222 South Ninth St., Suite 825 Minneapolis MN, 55402 United States	Electronic Service		No	Official 24-432
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