



---- Via Electronic Filing ----

4/10/2023

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

---

**RE:** *In the Matter of a Commission Investigation into the  
Potential Role of Third-Party Aggregation of Retail  
Customers.*

**DOCKET NO.:** E999/CI-22-600

**Date:** 4/10/2023

---

Dear Mr. Seuffert,

The Minnesota Rural Electric Association (“MREA”) respectfully submits these Reply Comments in the above-entitled docket regarding Aggregators of Retail Customers (“ARCs”). The MREA is the statewide association representing the interests of all 50 non-profit member-owned electric cooperatives in Minnesota, including all 44 distribution cooperatives and six generation and transmission cooperatives.

Sincerely,

*/s/ Darrick Moe*

---

Darrick Moe  
President & CEO  
Minnesota Rural Electric Association

**State of Minnesota  
before the  
Minnesota Public Utilities Commission**

<b>Katie Sieben</b>	<b>Chair</b>
<b>Valerie Means</b>	<b>Commissioner</b>
<b>Matthew Schuerger</b>	<b>Commissioner</b>
<b>Joseph Sullivan</b>	<b>Commissioner</b>
<b>John Tuma</b>	<b>Commissioner</b>

---

*In the Matter of a Commission Investigation into the  
Potential Role of Third-Party Aggregation of Retail  
Customers*

**DOCKET NO.: E999/CI-22-600**

**MREA Reply Comments**

---

**Introduction**

MREA joins other commentors, including the Department of Commerce (“Department”), utilities, labor, and low-income advocates, in opposing any change to or departure from the Commission’s prior decision to prohibit Aggregators of Retail Customers (“ARCs”) in Minnesota.

Although the outcome of this docket will not directly impact cooperative utilities, it could have an indirect impact as explained in the initial comments of Dakota Electric. Moreover, a decision to allow ARCs in Minnesota would set a troubling precedent that could destabilize the regulatory framework that has provided Minnesota consumers with highly reliable, affordable, and rapidly decarbonizing electricity.

Accordingly, MREA urges the Commission to continue prohibiting ARCs in Minnesota other than possibly allowing them in limited pilot programs proposed by utilities upon demonstration that ARCs will likely improve DR and not cause any ancillary harm to the public interest.

**Discussion**

**A. THERE IS NO BASIS FOR REVERSING OR CHANGING THE CURRENT PROHIBITION ON  
THIRD-PARTY AGGREGATORS IN MINNESOTA**

The Commission’s May 18, 2010, Order in Docket CI-09-1449 (“*Prohibition Order*”) expressly “prohibits the demand response of the retail customers . . . from being bid into organized markets by non-utility aggregators of retail customers.”<sup>1</sup> That Order was never reconsidered and there is no reason to alter or depart from it now.

---

<sup>1</sup> *In the Matter of an Investigation of Whether the Commission Should Take Action on Demand Response Bid Directly into the MISO Markets by Aggregators of Retail Customers Under FERC Orders 719 and 719-A, ORDER PROHIBITING BIDDING OF DEMAND RESPONSE INTO ORGANIZED MARKETS BY AGGREGATORS OF RETAIL*

The Commission indicated in its *Prohibition Order* that it was open to “pilot projects designed to explore the potential for ARCs . . . to increase total levels of demand response.” But in recognizing that one potential limited opening to ARCs, the Commission was clear that any such pilot proposal: “[1] must demonstrate a likelihood of increasing demand response . . . , [2] include protections to ensure no ratepayer harm and no reduction in existing levels of demand response . . . , [and] [3] demonstrate serious engagement with the concerns raised by the stakeholders. . . .”

None of the comments in this Docket provide a credible basis for concluding that allowing third-party ARCs would likely increase demand response (“DR”). Moreover, those advocating for third-party aggregation have failed to offer any “protections to ensure no ratepayer harm.” To the contrary, the comments filed by the Department and others document a record of successful utility demand response in the 13 years since the Commission’s *Prohibition Order* and identify a number of serious ratepayer risks associated with allowing ARCs.

As the Department of Commerce (“Department”) comments observed:

Minnesota currently ranks 1<sup>st</sup> nation-wide in MW of potential DR for the residential class, 3<sup>rd</sup> for the commercial class, and 17<sup>th</sup> for the industrial class. Overall, Minnesota has the 4<sup>th</sup> highest level of potential DR among the states. Thus, Minnesota has substantial qualities of DR already available.

The three investor-owned utilities, along with Dakota Electric, filed initial comments specifically detailing the substantial successes they’ve had implementing demand response over the past decade since the Commission’s *Prohibition Order*. Although the Department was unable to account for cooperative utility DR in its initial comments given limitations in Energy Information Agency (“EIA”) data, there is no doubt that Minnesota’s cooperative utilities have pursued DR aggressively and successfully.

Great River Energy’s 27 distribution cooperative members have a robust and highly successful array of DR programs that total 12.7% of summer peak demand and 18.1% of winter peak. One of those 27 members, Dakota Electric, noted in its initial comments that 40% of its residential members participate in at least one of its multiple DR programs. In total, Dakota Electric’s DR programs account for nearly 20% of its summertime peak, which would rank 3<sup>rd</sup> among the NERC-region utilities listed in Table 2 of the Department’s comments. Another GRE member cooperative, Wright-Hennepin, has a total load-control capability of 62 MW, which is 27% of its system peak. Wright-Hennepin’s average load control reduction is 24 MW or 11% of its system peak. Similarly, Connexus Energy has five different demand response programs with 30% residential subscribership. Connexus Energy’s DR programs overall are capable of reducing summer peak by 12%. Dairyland Cooperative has 100 MW of DR, which represents approximately 14% of its winter peak and nearly 10% of its summertime peak.

This record of successful DR among cooperatives is not surprising. As nonprofits directly accountable to their member-owners, cooperative utilities have a strong incentive to pursue DR

---

CUSTOMERS AND REQUIRING FURTHER FILINGS BY UTILITIES, Docket No. E-999/CI-09-1449 (*May 18, 2010*) (“*Prohibition Order*”), p. 6

and other strategies to avoid or defer the cost of adding more capacity. It is obvious from the data presented in the Department's comments that Minnesota's investor-owned utilities have also been highly motivated and successful implementing DR under the current regulatory framework without ARCs. There is *no reason* to believe Minnesota's utilities will not continue to be successful going forward and certainly *no credible basis* for concluding that Minnesota would likely have more DR if ARCs were allowed.

Minnesota's utilities have produced nation-leading demand response, energy efficiency, renewable deployment and decarbonization. These policy advances have been achieved through Minnesota's utilities without compromising affordability or reliability as Minnesota residential electric bills have remained below the national average and reliability metrics have remained among the highest in the nation. The lynchpin of these achievements is a regulatory framework built around exclusive service areas and a structure of accountability for the planning and delivery of electric service within those areas. Investor-owned utilities are accountable directly to the Commission. Similarly, cooperative utilities are accountable to their member-owners through elected boards while also being subject to regulatory oversight with respect to various aspects of their operations, including resource planning, conservation improvement programs, and compliance with renewable energy standards.

The Commission should zealously protect this highly successful framework and reject proposed encroachments absent compelling evidence of the need for any such encroachments. Far from providing a compelling case for allowing ARCs, the record in this case details substantial DR success by Minnesota's utilities and profound public interest risks associated with ARCs, including: (1) interference with critical utility planning; (2) cost increases resulting from the need to add more utility capacity to compensate for the loss of utility DR capacity; and (3) shifting DR costs to small or more energy-dependent customers who would not be attractive to unregulated ARCs seeking to maximize profits through high-margin sales. Allowing unregulated for-profit ARC businesses to provide or control critical energy resources for private gain could undermine efforts to ensure that utility service is provided fairly and reliably as well as efforts to advance racial and economic equity.

## **B. THE COMMISSION HAS AUTHORITY TO PROHIBIT THIRD-PARTY AGGREGATORS**

The 2010 Commission's decision to prohibit third-party aggregation was made after considering arguments challenging the Commission's authority over ARCs. Although the Commission did not make an explicit finding on its authority in that case, such a finding is obviously implicit in the Commission's decision to prohibit third-party aggregation. Importantly, the regulatory framework and related statutory definitions have not changed since that decision and the arguments challenging Commission jurisdiction to prohibit ARCs are no more persuasive now than they were then.

The issue isn't whether ARCs are public utilities. The issue is whether ARCs provide electric service in violation of Minnesota's service area exclusivity and the answer to that question is they do. Electric "service" is defined in Minnesota Statutes, section 216B.02, subdivision 6 as "natural, manufactured, or mixed gas and electricity; the installation, removal, or repair of *equipment or facilities for* delivering or *measuring* such gas and *electricity*." (Emphasis added).

Even assuming ARCs are not “providing electricity” they are certainly providing equipment for “measuring” electricity since measuring is central to determining the amount of electric consumption an ARC is shifting or deferring and then selling into the MISO market.

ARCs provide equipment to measure electricity and then, in effect, use that equipment for a transaction that involves the provision of electricity to utility customers. The Sierra Club/Union of Concerned Scientist (“Sierra Club/UCS”) comments wrongly assert that what they provide simply reduces usage. That assertion doesn’t tell the whole story. ARCs provide DR, which rather than reducing overall consumption, typically *shifts* consumption from peak to non-peak periods. Therefore, in addition to providing equipment that measures electricity as part of their service, ARCs are clearly involved in the delivery of electricity. DR is a tariffed, regulated electric service when provided by a utility and it is still electric service when provided by a non-utility. As a result, a non-utility ARC cannot provide aggregated DR in a utility’s exclusive service area without the utility’s consent.

Minnesota law, Minn. Stat. §216B.40, expressly grants utilities the “exclusive right to provide electric service at retail to each and every present and future customer in its assigned service area....”<sup>2</sup> This specific right of exclusivity is grounded in express legislative policy declared in Minn. Stat. §216B.37, which provides the following in relevant part:

It is hereby ***declared to be in the public interest*** that, in order to encourage the development of coordinated statewide electric service at retail, to eliminate or avoid unnecessary duplication of electric utility facilities, and to promote economical, efficient, and adequate electric service to the public, the state of ***Minnesota shall be divided into geographic service areas within which a specified utility shall provide electric service to customers on an exclusive basis.*** (Emphasis added).

Minnesota law is clear that ARCs cannot provide their DR services in a utility’s service area in Minnesota without the written consent of the utility. Hence, the Commission has both the authority and responsibility to prohibit ARCs unless their services are provided through a utility or with the utility’s consent.

It is indisputable that the provision of electricity is an essential service on which all households and businesses rely for their lives and livelihoods. Accordingly, as the Commission observed in its *Prohibition Order*, “[t]he Minnesota Public Utilities Act [Minn. Stat. Ch. 216B] creates a comprehensive regulatory structure to ensure that all state providers of electrical service have just and reasonable rates and just and reasonable terms and conditions of service.”<sup>3</sup> That framework involves resource plan proceedings, tariff filings and other regulatory oversight intended to protect the public interest with respect to essential electric service.

The Commission’s further observation in its *Prohibition Order* that “it is unclear how ARCs would fit into that regulatory structure...”<sup>4</sup> did not suggest the Commission had any doubt about

---

<sup>2</sup> Minn. Stat. §216B.40.

<sup>3</sup> *Prohibition Order*, p. 5.

<sup>4</sup> *Id.*

its authority over ARCs as suggested in the Sierra Club/UCS comments. To the contrary, the Commission was expressing serious doubt about the ability to protect the public interest if ARCs were allowed to provide what is otherwise provided exclusively by regulated utilities. The Commission understood then, as it should now, that ARCs provide electric service. And the Commission's stated concern about the risk ARCs could pose to the public interest reflected the Commission's understanding that what ARCs provide is clearly "clothed in the public interest." Nothing has changed since the *Prohibition Order* to suggest that what ARCs provide now is any less intertwined with the public interest.

Accordingly, MREA urges the Commission to reject the authorization of third-party retail demand response aggregation except pursuant to a utility-proposed pilot approved by the Commission under the criteria established in the *Prohibition Order*.

*/s/Darrick Moe*

---

Darrick Moe  
President & CEO  
Minnesota Rural Electric Association

**BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION**

121 Seventh Place East, Suite 350  
St. Paul, Minnesota 55101-2147

In the Matter of a Commission Investigation  
into the Potential Role of Third-Party  
Aggregation of Retail Customers

MPUC Docket No.: E999/CI-22-600

**AFFIDAVIT OF SERVICE**

STATE OF MINNESOTA        )  
  ) ss.  
COUNTY OF WASHINGTON    )

Mary G. Holly, of the City of Lake Elmo, County of Washington, the State of Minnesota, being first duly sworn, deposes and says that on the 10<sup>th</sup> day of April, 2023, she served the attached **MREA Reply Comments** to all said persons on the attached Service List, true and correct copies thereof, by eFiling and/or by depositing the same enclosed in an envelope, postage prepaid in the United States Mail at the post office in Minneapolis, Minnesota.

/s/ Mary G. Holly  
MARY G. HOLLY

Subscribed and sworn to before me this  
10<sup>th</sup> day of April, 2023.

/s/ Rachel M. Tillemans  
Notary Public

My Commission Expires: January 31, 2027

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Gary	Ambach	Gambach@slipstreaminc.org	Slipstream, Inc.	8973 SW Village Loop  Chanhassen, MN 55317	Electronic Service	No	OFF_SL_22-600_Official
Alison C	Archer	aarcher@misoenergy.org	MISO	2985 Ames Crossing Rd  Eagan, MN 55121	Electronic Service	No	OFF_SL_22-600_Official
Susan	Arntz	sarntz@mankatomn.gov	City Of Mankato	P.O. Box 3368  Mankato, MN 560023368	Electronic Service	No	OFF_SL_22-600_Official
Mara	Ascheman	mara.k.ascheman@xcelenenergy.com	Xcel Energy	414 Nicollet Mall Fl 5  Minneapolis, MN 55401	Electronic Service	No	OFF_SL_22-600_Official
Jessica L	Bayles	Jessica.Bayles@stoel.com	Stoel Rives LLP	1150 18th St NW Ste 325  Washington, DC 20036	Electronic Service	No	OFF_SL_22-600_Official
David	Bender	dbender@earthjustice.org	Earthjustice	1001 G Street NW Suite 1000 Washington, District of Columbia 20001	Electronic Service	No	OFF_SL_22-600_Official
Tracy	Bertram	tbertram@ci.becker.mn.us		12060 Sherburne Ave Becker City Hall Becker, MN 55308-4694	Electronic Service	No	OFF_SL_22-600_Official
James J.	Bertrand	james.bertrand@stinson.com	STINSON LLP	50 S 6th St Ste 2600  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_22-600_Official
Jessica	Beyer	jbeyer@greatermankato.com	Greater Mankato Growth	1961 Premier Dr Ste 100  Mankato, MN 56001	Electronic Service	No	OFF_SL_22-600_Official
Ingrid	Bjorklund	ingrid@bjorklundlaw.com	Bjorklund Law, PLLC	855 Village Center Drive #256  North Oaks, MN 55127	Electronic Service	No	OFF_SL_22-600_Official



First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Michael	Bull	mike@mrea.org	Minnesota Rural Electric Assn	11640 73rd Ave North Maple Grove, MN 55369	Paper Service	No	OFF_SL_22-600_Official
James	Canaday	james.canaday@ag.state.mn.us	Office of the Attorney General-RUD	Suite 1400 445 Minnesota St. St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_22-600_Official
Thomas	Carlson	thomas.carlson@edf-re.com	EDF Renewable Energy	10 2nd St NE Ste. 400  Minneapolis, Minnesota 55413	Electronic Service	No	OFF_SL_22-600_Official
John	Coffman	john@johncoffman.net	AARP	871 Tuxedo Blvd.  St. Louis, MO 63119-2044	Electronic Service	No	OFF_SL_22-600_Official
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400  St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_22-600_Official
Riley	Conlin	riley.conlin@stoel.com	Stoel Rives LLP	33 S. 6th Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_22-600_Official
George	Crocker	gwillc@nawo.org	North American Water Office	PO Box 174  Lake Elmo, MN 55042	Electronic Service	No	OFF_SL_22-600_Official
David	Dahlberg	davedahlberg@nweco.com	Northwestern Wisconsin Electric Company	P.O. Box 9 104 South Pine Street Grantsburg, WI 548400009	Electronic Service	No	OFF_SL_22-600_Official
Matthew	Deal	matthew.deal@chargepoint.com	ChargePoint, Inc.	254 Hacienda Ave  Campbell, CA 95008	Electronic Service	No	OFF_SL_22-600_Official
James	Denniston	james.r.denniston@xcelenergy.com	Xcel Energy Services, Inc.	414 Nicollet Mall, 401-8  Minneapolis, MN 55401	Electronic Service	No	OFF_SL_22-600_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
J.	Drake Hamilton	hamilton@fresh-energy.org	Fresh Energy	408 St Peter St Ste 350  Saint Paul, MN 55101	Electronic Service	No	OFF_SL_22-600_Official
Catherine	Fair	catherine@energycents.org	Energy CENTS Coalition	823 E 7th St  St Paul, MN 55106	Electronic Service	No	OFF_SL_22-600_Official
John	Farrell	jfarrell@ilsr.org	Institute for Local Self-Reliance	2720 E. 22nd St Institute for Local Self-Reliance Minneapolis, MN 55406	Electronic Service	No	OFF_SL_22-600_Official
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 280  Saint Paul, MN 551012198	Electronic Service	No	OFF_SL_22-600_Official
Mike	Fiterman	mikefiterman@libertydiversified.com	Liberty Diversified International	5600 N Highway 169  Minneapolis, MN 55428-3096	Electronic Service	No	OFF_SL_22-600_Official
Edward	Garvey	edward.garvey@AESLconsulting.com	AESL Consulting	32 Lawton St  Saint Paul, MN 55102-2617	Electronic Service	No	OFF_SL_22-600_Official
Jason	Grenier	jgrenier@otpc.com	Otter Tail Power Company	215 South Cascade Street  Fergus Falls, MN 56537	Electronic Service	No	OFF_SL_22-600_Official
Todd J.	Guerrero	todd.guerrero@kutakrock.com	Kutak Rock LLP	Suite 1750 220 South Sixth Street Minneapolis, MN 554021425	Electronic Service	No	OFF_SL_22-600_Official
Katherine	Hamilton	katherine@aem-alliance.org	Advanced Energy Management Alliance	1701 Rhode Island Ave, NW  Washington, DC 20036	Electronic Service	No	OFF_SL_22-600_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Kim	Havey	kim.havey@minneapolismn.gov	City of Minneapolis	350 South 5th Street, Suite 315M Minneapolis, MN 55415	Electronic Service	No	OFF_SL_22-600_Official
Philip	Hayet	phayet@jkenn.com	J. Kennedy and Associates, Inc.	570 Colonial Park Drive Suite 305 Roswell, GA 30075-3770	Electronic Service	No	OFF_SL_22-600_Official
Adam	Heinen	aheinen@dakotaelectric.com	Dakota Electric Association	4300 220th St W  Farmington, MN 55024	Electronic Service	No	OFF_SL_22-600_Official
Kimberly	Hellwig	kimberly.hellwig@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_22-600_Official
Annete	Henkel	mui@mnuutilityinvestors.org	Minnesota Utility Investors	413 Wacouta Street #230 St.Paul, MN 55101	Electronic Service	No	OFF_SL_22-600_Official
Michael	Hoppe	lu23@ibew23.org	Local Union 23, I.B.E.W.	445 Etna Street Ste. 61 St. Paul, MN 55106	Electronic Service	No	OFF_SL_22-600_Official
Alan	Jenkins	aj@jenkinsatlaw.com	Jenkins at Law	2950 Yellowtail Ave.  Marathon, FL 33050	Electronic Service	No	OFF_SL_22-600_Official
Richard	Johnson	Rick.Johnson@lawmoss.com	Moss & Barnett	150 S. 5th Street Suite 1200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_22-600_Official
Sarah	Johnson Phillips	sarah.phillips@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_22-600_Official
William D	Kenworthy	will@votesolar.org	Vote Solar	332 S Michigan Ave FL 9  Chicago, IL 60604	Electronic Service	No	OFF_SL_22-600_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Frank	Kohlasch	frank.kohlasch@state.mn.us	MN Pollution Control Agency	520 Lafayette Rd N.  St. Paul, MN 55155	Electronic Service	No	OFF_SL_22-600_Official
Michael	Krikava	mkrikava@taftlaw.com	Taft Stettinius & Hollister LLP	2200 IDS Center 80 S 8th St Minneapolis, MN 55402	Electronic Service	No	OFF_SL_22-600_Official
Jeffrey L.	Landsman	jlandsman@wheelerlaw.com	Wheeler, Van Sickle & Anderson, S.C.	44 E. Mifflin Street, 10th Floor  Madison, WI 53703	Electronic Service	No	OFF_SL_22-600_Official
Carmel	Laney	carmel.laney@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_22-600_Official
Peder	Larson	plarson@larkinhoffman.com	Larkin Hoffman Daly & Lindgren, Ltd.	8300 Norman Center Drive Suite 1000 Bloomington, MN 55437	Electronic Service	No	OFF_SL_22-600_Official
Annie	Levenson Falk	annief@cupminnesota.org	Citizens Utility Board of Minnesota	332 Minnesota Street, Suite W1360  St. Paul, MN 55101	Electronic Service	No	OFF_SL_22-600_Official
Kavita	Maini	kmairi@wi.rr.com	KM Energy Consulting, LLC	961 N Lost Woods Rd  Oconomowoc, WI 53066	Electronic Service	No	OFF_SL_22-600_Official
Emily	Marshall	emarshall@mojlaw.com	Miller O'Brien Jensen, PA	120 S. 6th Street Suite 2400 Minneapolis, Minnesota 55402	Electronic Service	No	OFF_SL_22-600_Official
Mary	Martinka	mary.a.martinka@xcelenergy.com	Xcel Energy Inc	414 Nicollet Mall 7th Floor Minneapolis, MN 55401	Electronic Service	No	OFF_SL_22-600_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Daryl	Maxwell	dmaxwell@hydro.mb.ca	Manitoba Hydro	360 Portage Ave FL 16 PO Box 815, Station Main Winnipeg, Manitoba R3C 2P4  Canada	Electronic Service	No	OFF_SL_22-600_Official
Taylor	McNair	taylor@gridlab.org		668 Capp Street  San Francisco, CA 94110	Electronic Service	No	OFF_SL_22-600_Official
Joseph	Meyer	joseph.meyer@ag.state.mn.us	Office of the Attorney General-RUD	Bremer Tower, Suite 1400 445 Minnesota Street St Paul, MN 55101-2131	Electronic Service	No	OFF_SL_22-600_Official
Gregory C.	Miller	gmiller@dakotaelectric.com	Dakota Electric Association	4300 220th Street West  Farmington, MN 55024	Electronic Service	No	OFF_SL_22-600_Official
Stacy	Miller	stacy.miller@minneapolismn.gov	City of Minneapolis	350 S. 5th Street Room M 301 Minneapolis, MN 55415	Electronic Service	No	OFF_SL_22-600_Official
David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St  Duluth, MN 558022093	Electronic Service	No	OFF_SL_22-600_Official
Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP	33 South Sixth St Ste 4200  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_22-600_Official
Evan	Mulholland	emulholland@mncenter.org	Minnesota Center for Environmental Advocacy	1919 University Ave W Ste 515  Saint Paul, MN 55101	Electronic Service	No	OFF_SL_22-600_Official
Alan	Muller	alan@greendel.org	Energy & Environmental Consulting	1110 West Avenue  Red Wing, MN 55066	Electronic Service	No	OFF_SL_22-600_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Kristin	Munsch	kmunsch@citizensutilityboard.org	Citizens Utility Board of Minnesota	309 W. Washington St. Ste. 800 Chicago, IL 60606	Electronic Service	No	OFF_SL_22-600_Official
Amanda	Myers	amanda@weavegrid.com	Weave Grid, Inc.	222 7th Street 2nd Floor San Francisco, California 94103	Electronic Service	No	OFF_SL_22-600_Official
Carl	Nelson	cnelson@mncee.org	Center for Energy and Environment	212 3rd Ave N Ste 560  Minneapolis, MN 55401	Electronic Service	No	OFF_SL_22-600_Official
J	Newberger	Jnewberger1@yahoo.com	State Rep	14225 Balsam Blvd  Becker, MN 55308	Electronic Service	No	OFF_SL_22-600_Official
David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency	220 South Sixth Street Suite 1300 Minneapolis, Minnesota 55402	Electronic Service	No	OFF_SL_22-600_Official
Rolf	Nordstrom	rnordstrom@gpisd.net	Great Plains Institute	2801 21ST AVE S STE 220  Minneapolis, MN 55407-1229	Electronic Service	No	OFF_SL_22-600_Official
Samantha	Norris	samanthanorris@alliantenergy.com	Interstate Power and Light Company	200 1st Street SE PO Box 351  Cedar Rapids, IA 524060351	Electronic Service	No	OFF_SL_22-600_Official
M. William	O'Brien	bobrien@mojlaw.com	Miller O'Brien Jensen, P.A.	120 S 6th St Ste 2400  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_22-600_Official
Ric	O'Connell	ric@gridlab.org	GridLab	2120 University Ave  Berkeley, CA 94704	Electronic Service	No	OFF_SL_22-600_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Carol A.	Overland	overland@legalectric.org	Legaelectric - Overland Law Office	1110 West Avenue Red Wing, MN 55066	Electronic Service	No	OFF_SL_22-600_Official
Jessica	Palmer Denig	jessica.palmer-Denig@state.mn.us	Office of Administrative Hearings	600 Robert St N PO Box 64620 St. Paul, MN 55164	Electronic Service	No	OFF_SL_22-600_Official
Audrey	Partridge	apartridge@mncee.org	Center for Energy and Environment	212 3rd Ave. N. Suite 560  Minneapolis, Minnesota 55401	Electronic Service	No	OFF_SL_22-600_Official
Lisa	Perry	Lisa.Perry@walmart.com	Walmart	2608 SE J St  Bentonville, AR 72716	Electronic Service	No	OFF_SL_22-600_Official
J. Gregory	Porter	greg.porter@nngco.com	Northern Natural Gas Company	1111 South 103rd St  Omaha, NE 68124	Electronic Service	No	OFF_SL_22-600_Official
Gregory	Poulos	gpoulos@enercoc.com	EnerNOC, Inc.	5093 Heath Gate Dr.  New Albany, Ohio 43054	Paper Service	No	OFF_SL_22-600_Official
Kevin	Pranis	kpranis@liunagro.com	Laborers' District Council of MN and ND	81 E Little Canada Road  St. Paul, Minnesota 55117	Electronic Service	No	OFF_SL_22-600_Official
Greg	Pruszinske	gpruszinske@ci.becker.mn.us	City of Becker	PO Box 250 12060 Sherburne Ave Becker, MN 55308	Electronic Service	No	OFF_SL_22-600_Official
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_22-600_Official
Kevin	Reuther	kreuther@mncenter.org	MN Center for Environmental Advocacy	26 E Exchange St, Ste 206  St. Paul, MN 551011667	Electronic Service	No	OFF_SL_22-600_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Jacob J.	Schlesinger	jschlesinger@keyesfox.com	Keyes & Fox LLP	1580 Lincoln St Ste 880  Denver, CO 80203	Electronic Service	No	OFF_SL_22-600_Official
Christine	Schwartz	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7  Minneapolis, MN 554011993	Electronic Service	Yes	OFF_SL_22-600_Official
Doug	Scott	dscott@gpisd.net	Great Plains Institute	2801 21st Ave Ste 220  Minneapolis, MN 55407	Electronic Service	No	OFF_SL_22-600_Official
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th PI E Ste 350  Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_22-600_Official
Patricia F	Sharkey	psharkey@environmentalawcounsel.com	Midwest Cogeneration Association.	180 N LaSalle St Ste 3700 Chicago, IL 60601	Electronic Service	No	OFF_SL_22-600_Official
Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.	76 W Kellogg Blvd  St. Paul, MN 55102	Electronic Service	No	OFF_SL_22-600_Official
Joshua	Smith	joshua.smith@sierraclub.org		85 Second St FL 2  San Francisco, California 94105	Electronic Service	No	OFF_SL_22-600_Official
Beth H.	Soholt	bsoholt@windonthewires.org	Wind on the Wires	570 Asbury Street Suite 201  St. Paul, MN 55104	Electronic Service	No	OFF_SL_22-600_Official
Anna	Sommer	ASommer@energyfuturesgroup.com	Energy Futures Group	PO Box 692  Canton, NY 13617	Electronic Service	No	OFF_SL_22-600_Official



First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Mark	Spurr	mspur@fvbenergy.com	International District Energy Association	222 South Ninth St., Suite 825  Minneapolis, Minnesota 55402	Electronic Service	No	OFF_SL_22-600_Official
Byron E.	Starns	byron.starns@stinson.com	STINSON LLP	50 S 6th St Ste 2600  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_22-600_Official
James M	Strommen	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered	150 S 5th St Ste 700  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_22-600_Official
Eric	Swanson	eswanson@winthrop.com	Winthrop & Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_22-600_Official
Mona	Tierney Lloyd	mtierney-lloyd@enemoc.com	EnerNoc Inc	N/A	Paper Service	No	OFF_SL_22-600_Official
Christopher	Villarreal	cvillarreal@rstreet.org	R Street Institute	1212 New York Ave NW Ste 900 Washington, DC 20005	Electronic Service	No	OFF_SL_22-600_Official
Julie	Voeck	julie.voeck@nee.com	NextEra Energy Resources, LLC	700 Universe Blvd  Juno Beach, FL 33408	Electronic Service	No	OFF_SL_22-600_Official
Laurie	Williams	laurie.williams@sierraclub.org	Sierra Club	Environmental Law Program 1536 Wynkoop St Ste 200 Denver, CO 80202	Electronic Service	No	OFF_SL_22-600_Official
Samantha	Williams	swilliams@nrdc.org	Natural Resources Defense Council	20 N. Wacker Drive Ste 1600 Chicago, IL 60606	Electronic Service	No	OFF_SL_22-600_Official
Joseph	Windler	jwindler@winthrop.com	Winthrop & Weinstine	225 South Sixth Street, Suite 3500  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_22-600_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Jeff	Zethmayr	jzethmayr@citizensutilityboard.org	Citizens Utility Board	309 W. Washington, Ste 800  Chicago, IL 60606	Electronic Service	No	OFF_SL_22-600_Official
Kurt	Zimmerman	kwz@ibew160.org	Local Union #160, IBEW	2909 Anthony Ln  St Anthony Village, MN 55418-3238	Electronic Service	No	OFF_SL_22-600_Official
Patrick	Zomer	Pat.Zomer@lawmoss.com	Moss & Barnett PA	150 S 5th St #1200  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_22-600_Official