



414 Nicollet Mall
Minneapolis, MN 55401

April 16, 2025

—Via Electronic Filing—

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

RE: COMMENTS
IN THE MATTER OF A COMMISSION INQUIRY INTO XCEL ENERGY'S ADVANCED
RATE DESIGN FOR LOAD MANAGEMENT
DOCKET NO. E002/CI-24-115

Dear Mr. Seuffert:

Northern States Power Company, doing business as Xcel Energy, submits our comments in Docket No. E002/CI-24-115 pursuant to the Minnesota Public Utilities Commission's (Commission) March 17, 2025, Notice of Comment Period.

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.

Please contact Jemar Lee at jemar.w.lee@xcelenergy.com or 319-450-3189, or me at nicholas.f.martin@xcelenergy.com or (612) 330-6255 if you have any questions regarding this filing.

Sincerely,

/s/

NICHOLAS MARTIN
DIRECTOR, STRATEGY OUTREACH & ADVOCACY

Enclosures
cc: Service List

STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION

Katie J. Sieben	Chair
Hwikwon Ham	Commissioner
Audrey C. Partridge	Commissioner
Joseph K. Sullivan	Commissioner
John A. Tuma	Commissioner

IN THE MATTER OF A COMMISSION
INQUIRY INTO XCEL ENERGY'S
ADVANCED RATE DESIGN FOR LOAD
MANAGEMENT

DOCKET NO. E002/CI-24-115

INITIAL COMMENTS

INTRODUCTION

Northern States Power Company, doing business as Xcel Energy, submits these Comments to the Minnesota Public Utilities Commission in response to the Commission's March 17, 2025 Notice of Comment Period in the above-referenced docket.

The Notice seeks comment on the following topics:

- Should Xcel Energy perform a study evaluating the contribution to Minnesota system costs caused by residential customers with different usage profiles, consulting the Citizens Utility Board Illinois study as an example?
- What action should the Commission take, if any, regarding the information submitted by the Citizens Utility Board of Minnesota and the Chan Lab at the University of Minnesota in their February 13, 2025 and March 5, 2025 letters related to this matter?
- If the Commission orders such a study, what guidance on the methodology, contents, and goals should it provide?
- If the Commission orders such a study, when should Xcel file it and what process should be used to evaluate it?
- Are there other issues or concerns related to this matter?

Xcel Energy appreciates the opportunity to submit these comments. We believe a study similar to the CUB Illinois one is not needed, as similar findings have already been shown for our Minnesota low-income residential customers; in addition, rate options now exist that address the needs identified in the study. If the Commission nonetheless feels such a study is warranted, the Company could conduct it in-house or in collaboration with others. We believe no Commission action is needed at this time regarding the information submitted by the Citizens Utility Board of Minnesota and the University of Minnesota in their February 13, 2025 and March 5, 2025 letters. The Company explained its denial of the February 13, 2025 Data Request in terms of its timing and potential redundancy, and we acted squarely in compliance with the established Open Data Access Standards (ODAS), which we intend to do until such time as objective standards are developed for sharing anonymized customer data without the risk of reidentification. Finally, should the Commission order the Company to conduct a study on its own or in collaboration with other parties, compilation of data for the study should begin no sooner than January 2027, allowing any recommendations that emerge from that study to be grounded in at least one full year of Advanced Metering Infrastructure (AMI) data for all of the Company's Minnesota residential customers.

We provide a brief background and then address the Notice topics in turn.

COMMENTS

A. Background

1. Origin of the Notice

The current Notice derives from Order Point 15 in the Commission's December 5, 2024 Order in Docket No. E002/M-24-173:

15. The Commission authorizes the Executive Secretary to issue a Notice of Comment Period in Docket No. E002/CI-24-115 on whether Xcel should perform a study evaluating the contribution to Minnesota system costs caused by residential customers with different usage profiles. The comment period may consider segmenting Xcel's residential customers into groups based on usage profile, consulting the Citizen's Utility Board Illinois study as an example.

In that Order, the Commission approved the Automatic Bill Credit (ABC) Pilot proposed by Xcel Energy and 27 members of its Equity Stakeholder Advisory Group. The ABC Pilot aims to improve affordability for cost-burdened

residential customers, pilot-testing testing a streamlined approach to delivering assistance by using geospatial analysis of electric bills and household income to identify Census Block Groups (CBGs) across the Company's Minnesota electric service territory where electric energy burden is estimated to exceed 4 percent of income. All premises in the eligible CBGs will receive automatic bill credits designed to reduce median electric energy burden to 4 percent, without requiring income documentation or other enrollment actions by the customer.

The Commission did not condition approval of the ABC Pilot on the study that may emerge from Order Point 15 (Study). In fact, the Commission did not order a Study, but rather ordered a Notice of Comment on whether the Company should perform a Study. The ABC Pilot is now underway.

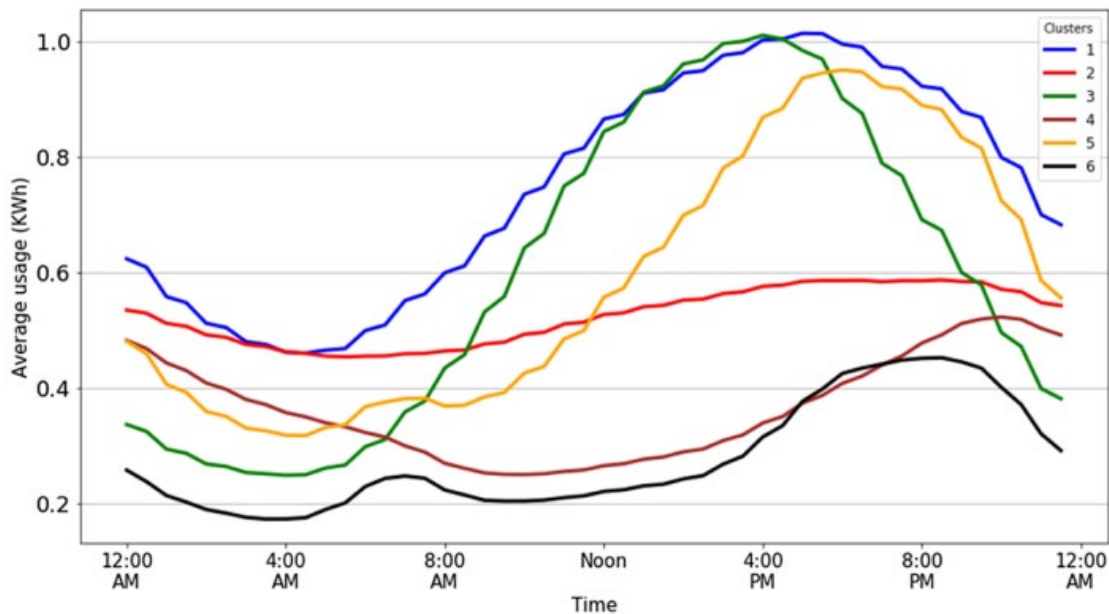
2. The CUB Illinois Study

The CUB Illinois study¹ examined anonymous electric consumption data from about 2.5 million residential customers of ComEd and Ameren in Illinois. The researchers examined half-hourly interval volume readings from smart meters, identified by customer class, random ID number, and geographic location. They combined this data with demographic attributes at the CBG level taken from the U.S. Census Bureau's 2017 American Community Survey. They segmented the customers using a technique called "k-means clustering," a machine learning algorithm, grouping them into six clusters based on their summer load shape. They then used a logistic regression model to determine the likelihood of a customer in each of the resulting six clusters to reside in locations associated with various demographic indicators including age of head of household, construction year of residence, educational attainment, and median income.

The researchers found that lower and generally flatter load profiles (clusters 2, 4 and 6 in Figure 1 below) tended to be associated with younger, more urban, and lower-income customers, and peakier load profiles (clusters 1, 3 and 5) more associated with the baseline and/or older, exurban, higher-income customers. Low-income customers in ComEd's Chicago service territory were significantly more likely to exhibit lower overall volumes and flatter load shapes. The single most likely cluster for low-income households, Cluster 2, also had the flattest usage, and low-income customers were 3.5 times more likely than average to exhibit this usage profile.

¹ Zethmayr and Singh Makhija, *Six unique load shapes: A segmentation analysis of Illinois residential electricity consumers*, The Electricity Journal, Volume 32, Issue 9, November 2019, available at: <https://www.citizensutilityboard.org/wp-content/uploads/2019/06/ClusterAnalysisFinal.pdf>.

Figure 1. Average volume usage in kWh
Reproduced from Fig. 2 of CUB Illinois study



The researchers conclude that:

High peak usage is a large driver of system costs, requiring more robust distribution and transmission grids, and higher capacity requirements in areas with capacity markets. From this perspective, customers with high peaks relative to their overall volume likely pay less in their bills than the system costs they actually cause, while customers with flatter load shapes have higher volume relative to their peak usage, leading to them overpaying. The high correlation between flat usage and lower incomes suggests this cross-subsidization has particularly harmful consequences, considering low-income households already pay a higher proportion of their income on utility bills. This finding should encourage utilities and utility commissions to adopt a wider offering of dynamic rate designs that may more accurately reflect customers' cost of service, reducing this cross-subsidization.²

- B. Should Xcel perform a study evaluating the contribution to Minnesota system costs caused by residential customers with different usage profiles, consulting the Citizens Utility Board Illinois study as an example?**

² Ibid. at page 7.

We break this question into two parts: does the Company believe such a Study is needed at this time, and could the Company perform such a Study if the Commission decides to require it?

1. Is the Study Needed?

While the Company is not opposed to performing a Study similar to the CUB Illinois one, we question whether such a Study is needed for two reasons: (1) similar findings have already been shown for our Minnesota low-income residential customers, and (2) rate options now exist addressing the needs identified in the Study.

First, the Study's primary finding – that low-income customers in Illinois have generally lower and flatter usage profiles than customers overall – is similar to information the Company has already found for our own Minnesota residential customer base. During the Residential Time of Use (TOU) Rate Pilot we ran from 2020 to 2022 in Minnesota, low-income customers appeared to have lower on-peak demand. They also, on average, appeared to have less overall energy usage. Of course, in both cases – lower usage and flatter usage – these patterns do not hold for every low-income customer. Some will have higher usage due to variables such as a large family or poorly insulated home, and some will be less able to shift usage to off-peak hours due to work schedules, family obligations or other factors. These are merely general patterns, but are consistent with the CUB Illinois study.

Second, if one assumes a Minnesota Study replicating the CUB Illinois one were to reach similar findings, there are already several rate options that address the issues raised by CUB Illinois and that assist customers with these usage patterns. We highlight three in particular here. First, in our 2021 multiyear rate plan (Docket No. E002/GR-21-630), the Commission approved a Low-Income Low-Usage (LILU) rate discount program that provides a 35 percent discount per kWh to customers who have monthly average usage below 300 kWh and either are currently enrolled in a state or federal assistance program, or self-declare income below 50 percent of State Median Income. This program appears in our affordability program portfolio as the “Low Usage Affordability Credit” program.³ As of the end of 2024, that program had 14,459 participants,

³ See [Low-Usage Affordability Credit | Energy Assistance | Billing & Payment | Xcel Energy](#). The Company is working to transition all our affordability programs away from the term “low-income,” which has a negative connotation for some, and can also create confusion for customers who may not consider themselves low-income but still qualify.

but remains in early stages and is expected to grow, with an estimated future enrollment of around 87,000.⁴

A second option is residential TOU rates, which allow customers using energy during non-peak hours to pay lower rates for that usage. Customers with flatter load profiles would benefit from this TOU rate structure because they are paying for the majority of their energy usage during lower-cost time periods. In our Minnesota TOU Pilot, more than 70 percent of low-income customers participating in the Pilot experienced bill savings, with bill reductions of about three percent on average when compared to a standard flat energy rate.⁵

Following that Pilot, on March 6, 2025, the Commission approved an opt-in residential TOU rate that will soon be available to all of Xcel Energy's Minnesota residential customers (Docket No. E002/M-23-524). The Company expects to file an implementation plan within 90 days of the Commission's Order, and the new rate will launch in 2026. If a Minnesota Study replicating the CUB Illinois one were to show similar usage patterns for the Company's low-income residential customers, then an obvious policy implication would be to create a residential TOU rate and encourage enrollment by as many low-income customers as could benefit from that rate; that option has now been approved in Minnesota and will soon be available for customers.⁶

A third option is the now-approved ABC Pilot.⁷ That Pilot, while not tied to low overall usage or flatter load profiles, is similar to the CUB Illinois example in that it uses geospatial analysis and U.S. Census demographic data to identify parts of the Company's Minnesota electric service territory where poverty is concentrated and electric energy burden is high. The ABC Pilot will deliver automatic bill credits to all residential customers in the eligible CBGs without

⁴ See 2024 ANNUAL REPORT - ELECTRIC LOW INCOME ENERGY DISCOUNT PROGRAM. Docket Nos. E002/M-04-1956, E002/M-10-854, AND E002/23-476. Page 11.

⁵ Northern States Power Company, d/b/a Xcel Energy. February 10, 2023 COMPLIANCE FILING – PILOT COMPLETION. RESIDENTIAL TIME OF USE RATE DESIGN PILOT. Docket No. E002/M-17-775. See also April 16, 2024 SUPPLEMENT *In the Matter of the Petition of Northern States Power Company, d/b/a/ Xcel Energy, for Approval of a Residential Time Of Use Rate Design*. Docket No. E002/M-23-524, at page 30.

⁶ Residential demand rates could be another rate option to charge customers for the costs they cause during peak demand timeframes. Today these costs are included in the energy charge. The Company notes that this idea has not previously held interest for stakeholders, and the peak demand cost assignment is accomplished within the structure of the Residential TOU rate option discussed above. Therefore, the Company is not advocating for this option.

⁷ December 5, 2024 ORDER APPROVING AUTOMATIC BILL CREDIT PILOT PROGRAM AS MODIFIED. Docket Nos. E002/M-24-173, E002/M-22-266, E002/RP-19-368.

requiring income documentation or other enrollment actions by the customer.

Therefore, the Commission has approved three options – LILU, the opt-in residential TOU rate, and the ABC Pilot – that, together with our existing portfolio of affordability programs for low-income customers, arguably provide many of the options that a Study similar to the CUB Illinois model might point to. Rather than a lengthy Study, we believe resources are better spent educating customers, including low-income customers, about these options.

2. Could the Company Conduct Such a Study?

If the Commission sees benefits nonetheless in ordering this Study, we believe the Company could conduct it. In order to balance speed with accuracy, we believe the appropriate timing for such a Study would be after a full year of data is available following full deployment of AMI in Minnesota. Residential AMI deployment is today about 90 percent complete in Minnesota, but 12 months of data is available for less than 65 percent of the Company's Minnesota residential customers. If the Study were to begin one year after full AMI deployment, the Study would benefit from a year's worth of data from the vast majority of our customers,⁸ without potential distortions due to the non-random nature of AMI deployment. We believe this is the minimum data needed if such a Study – whether conducted by the Company or others – is to be the basis for rate design recommendations. Deployment is expected to be substantially complete by the end of 2025; compiling data for the Study could therefore begin no sooner than January 2027.

To conduct the geospatial portion of the analysis, using the CUB Illinois study as an example, we would engage the Company's Geospatial Analysis team. That team has recently conducted analyses of our customer base relative to U.S. Census data on median income, poverty, and energy burden, both for the Minnesota Electric Service Quality Interactive Map⁹ and for the analysis supporting the ABC Pilot approved in Docket No. E002/M-24-173. The Company's Load Research and Geospatial teams would collaborate on the Study, with the Load Research team providing analysis of load profiles and customer segmentation based on AMI interval data, and the Geospatial team

⁸ We estimate that less than one percent of Minnesota customers will not have received AMI by the end of 2025 due to specialized KYZ meters, customers billed through load management equipment with pulses, and meters that cannot be accessed or require repairs to the customer's service. In addition, to date 5,923 customers have opted-out of receiving an AMI meter, or about 0.5 percent of Minnesota customers.

⁹ See [MN Service Quality - Electric](#).

adding a spatial component, using (similar to the CUB Illinois study) U.S. Census data on income and other demographic variables.

We believe the Company has the capabilities to conduct such a Study in-house, but we are not opposed to working in collaboration with the University of Minnesota or others on it, as discussed further below.

C. What action should the Commission take, if any, regarding the information submitted by the Citizens Utility Board of Minnesota and the Chan Lab at the University of Minnesota in their February 13, 2025 and March 5, 2025 letters related to this matter?

We do not believe the Commission needs to take any action on the February 13, 2025 letter and March 5, 2025 Complaint, for reasons explained in this section.

CUB and the University of Minnesota on February 13, 2025 submitted to the Company a Data Request for 12 to 36 months of 30-minute interval, anonymized and geographically specific customer energy use data (CEUD) for all customers with AMI.¹⁰ On the same date, they filed a letter in Docket No. E002/CI-24-115 proposing to use this data to conduct a study that would follow the methodology employed by the Illinois CUB study, working with researchers at Carnegie Mellon University and the University of Maryland. They proposed to evaluate:

...residential customers' usage patterns and contributions to total system costs on an intra-class basis [to] help answer questions like: How equitable is a utility's existing flat rate design? Are there opportunities for a different rate design to both better reflect cost causation and promote affordability for low-income customers? How might utility rates or programs be designed to more efficiently target greenhouse gas reductions? How is electrification of heating and transportation impacting cost causation and affordability for low-income customers? We hope that this study may provide information relevant to topics that the Commission and parties are currently considering, such as time-of-use rates and affordability for cost-burdened households.¹¹

¹⁰ Attachment A to March 5, 2025 Complaint of CUB Minnesota and the University of Minnesota (hereafter "March 5 Complaint"), *In the Matter of a Commission Inquiry into Xcel Energy's Advanced Rate Design for Load Management* (Docket No. E-002/CI-24-115) and *In the Matter of a Petition by the Citizens Utility Board of Minnesota to Adopt Open Data Access Standards* (Docket No. E,G-999/M-19-505).

¹¹ February 13, 2025 letter from CUB Minnesota and the University of Minnesota *In the Matter of a Commission Inquiry into Xcel Energy's Advanced Rate Design for Load Management*, Docket No. E-002/CI-24-115. Pages 1-2.

CUB and the University added that they “expect this study to be analytical in nature, without any regulatory or policy recommendations. However, we expect that the conclusions will be informative for Commission proceedings and more broadly.” They estimated the study would take up to 12 months to complete.¹²

Note that, while indicating the study itself will not provide regulatory or policy recommendations, CUB and the University highlight its potential implications for “time-of-use rates and affordability for cost-burdened households.” As discussed above, residential TOU rates, the Company’s low-usage rate discount, and its ABC Pilot based on energy burden are now established options for the Company’s low-income customers, and it is not strictly accurate to refer to “a utility’s existing flat rate design” with respect to Xcel Energy, since there are other options. We do not suggest those options address every need, or that the Company will not continue to explore additional options to assist low-income customers. They do, however, address what CUB and the University suggest could be a key outcome of their year-long study.

Following the Company’s decision to deny the University’s February 13, 2025 Data Request, CUB and the University on March 5, 2025 filed a Complaint in Docket Nos. E002/CI-24-115 and E,G-999/M-19-505, objecting to the Company’s rationale for denying the request.¹³

The Company declined the February 13, 2025 Data Request for two primary reasons, as discussed in Attachment B of the Complaint. We discuss those reasons in greater detail here.

1. Timing and Redundancy with the Present Comment Period

At the time of the February 13, 2025 Data Request, the Company had been notified that the current Notice for Comment was imminent, and was aware it may result in the Commission directing the Company itself to perform a study similar to what CUB and the University proposed. The Company therefore stated that “we prefer to await the outcome of that comment period prior to any agreement on this request.”

The Complaint alleges that the Company maintains the existence of a related

¹² *Ibid.* at 3.

¹³ March 5, 2025 Complaint of CUB Minnesota and the University of Minnesota *In the Matter of a Commission Inquiry into Xcel Energy’s Advanced Rate Design for Load Management* (Docket No. E-002/CI-24-115) and *In the Matter of a Petition by the Citizens Utility Board of Minnesota to Adopt Open Data Access Standards* (Docket No. E,G-999/M-19-505).

docketed procedure should permit a utility to deny requests for CEUD.¹⁴ We do not; we have not made any such generalized statement. However, in this specific case we knew from the Commission's December 5, 2024 Order in Docket No. E002/M-24-173 that a Notice for Comment was forthcoming, and we knew from the January 17, 2025 Notice of Docket Process and Topics for Comment in Docket No. E002/CI-24-115 that the questions would include:

- Should Xcel perform a study evaluating the contribution to Minnesota system costs caused by residential customers with different usage profiles, consulting the Citizens Utility Board Illinois study as an example?
- If the Commission orders such a study, what guidance on the methodology and contents should it provide?
- If the Commission orders such a study, when should Xcel file it and what process should be used to evaluate it?¹⁵

We thus proposed to CUB and the University to let the comment period play out, see whether the Commission orders Xcel Energy to perform this Study, and what guidance the Commission provides on Study methodology, contents and evaluation process. We could then consider whether it makes sense to work together on a Study. We believed it would be redundant and potentially confusing for two similar but different studies – one led by the Company, one by the University – to be conducted in parallel. We concluded our response not with a categorical refusal, but rather, “We would of course be willing to revisit your request at a later date, as the information and standards around securing anonymized data evolve, and as we know the results of the forthcoming comment period.”¹⁶

2. Risks to Customer Privacy

Independent of timing and process considerations, the Company articulated in our response to the February 13, 2025 Data Request the following rationale, which is fully consistent with the position the Company has taken in the record in Docket No. E,G-999/M-19-505:

The Open Data Access Standards allow but do not require utilities to provide anonymized CEUD. Section III.C. states, “Notwithstanding section III.B, a

¹⁴ March 5 Complaint at 4.

¹⁵ January 17, 2025 *Notice of Docket Process and Topics for Comment* at page 3. Docket No. E-002/CI-24 115.

¹⁶ March 5 Complaint, *Attachment B*.

utility may refuse to provide aggregated or anonymized CEUD when it reasonably believes the data release would create a security risk for the utility, its customer(s), or the public, or that the release would allow the third party to re-identify customers, violate the terms of the contract in 2(v) above, or otherwise use the data in violation of these standards.” We take our responsibility to secure and protect our customers’ data very seriously and, to date, we have been very clear that we would decline to provide anonymized CEUD until an objective basis has been established to address the risk of customer re-identification from anonymized CEUD. Commission Orders in E,G-999/M-19-505 have supported that position. On that basis, we have thus far not fulfilled any requests for anonymized CEUD in Minnesota due to the risk that release would allow a third party to re-identify customers or create a security risk for the utility, its customers, or the public, resulting in disclosure of sensitive information that the Commission has tasked utilities with protecting. We decline this request on that basis as well.¹⁷

The Complaint downplays the risk of customer re-identification and claims that

Xcel’s blanket rejection would effectively supplant the Commission’s determination that Open Data Access Standards (ODAS) establishes [sic] an ‘appropriate balance’ between the twin goals of facilitating data access and customer privacy. Indeed, the Commission already expressly considered, and rejected, Xcel’s argument. Xcel’s refusal to provide CEUD in response to the Chan Lab’s request violates the Commission’s July 5, 2024 Order implementing anonymized data access standards.¹⁸

In their reading, the ODAS requires utilities to provide anonymized CEUD as long as the request is from an authorized requester and for an authorized purpose.

This interpretation is contrary to the plain language of the ODAS and the Commission’s July 5, 2024 Order in Docket No. E,G999/M-19-505. In that Order, the Commission – while making extensive redlines to the ODAS – chose to make no revisions to Section III.C except to correct a typo:

h. Modify existing Section III.C:

Notwithstanding section III.B, a utility may refuse to provide aggregated or anonymized CEUD when it reasonably believes the data release would create a security risk for the utility, its customer(s), or the public, or that the release would

¹⁷ March 5 Complaint, *Attachment B*.

¹⁸ March 5 Complaint at 4.

allow the third party to re-identify customers, violate the terms of the contract in 2(v) above, or otherwise use the data in violation of these standards.

Contrary to the Complaint's assertion, the Commission did not remove or otherwise limit Section III.C. In fact – specifically addressing the utilities' concerns about data privacy – the Commission's Order expressly states that “if a utility determines that all these protections are inadequate, the utility may refuse individual data requests pursuant to Section III.C in the Standards.”¹⁹

The Company acknowledges that the Commission has articulated an anonymization standard in the ODAS based on the information that has been provided to it. Unfortunately, however, that information does not include expert-level analysis of the anonymization standard. Despite a 2021 RFP issued by the Department of Commerce for an independent data privacy expert, no data privacy expert has contributed to the record. As a result, the Company has reasonable concerns as to whether the standard is sufficient to protect from re-identification of sensitive customer data. The Company takes its responsibility for its customers' data privacy seriously; once it releases the data, the Company loses control of it. There may be instances where the Commission deems the value of data anonymization sufficient to offset this risk. Here, the imbalance of risk to reward is particularly apparent, where the need for such a Study is an open question, and, even if needed, the Company could itself be ordered to undertake the requested Study (with no third-party disclosure necessary).

For clarity, we do not dispute that the three universities are authorized requesters under ODAS Section III.B(2)(iv)(d), nor does our position reflect concerns specific to those universities. We do note that conducting research “in compliance with federal laws governing the protection of human subjects”²⁰ does not address customer privacy and re-identification concerns, which are governed by Minnesota customer privacy statutes, not federal laws governing the protection of human subjects. We have no hesitations specific to these requesters; rather, we maintain our position – supported by ODAS Section III.C – that no objective basis for the anonymization standard has been set forth, and thus there is a reasonable risk of re-identification.

¹⁹ July 5, 2024 ORDER REFINING OPEN DATA ACCESS STANDARDS. *In the Matter of a Petition by the Citizens Utility Board of Minnesota to Adopt Open Data Access Standards*, Docket No. E,G999/M-19-505 and *In the Matter of a Commission Inquiry into Privacy Policies of Rate-Regulated Energy Utilities*, Docket No. E,G999/CI-12-1344. Page 5.

²⁰ March 5 Complaint at 5.

3. Cost of Fulfilling the Data Request

The University's Data Request is for a very large amount of data – 12 to 36 months of 30-minute interval data for virtually all of the Company's Minnesota residential customers.²¹ There are 17,520 thirty-minute intervals in 12 months, so providing data for the approximately 1.1 million AMI meters currently deployed in Minnesota would mean at minimum 19.3 billion individual data points that the Company would need to anonymize and identify by Census Block Group.²² This is a rough estimate, and likely conservative, since AMI deployment is ongoing and some AMI meters have been deployed for over 12 months.

The ODAS provide that utilities may charge requesters a “data access fee” based on the actual costs incurred to create and deliver the requested data.²³ To the extent the Company is ordered to provide anonymized data, the Company plans to charge the data access fee for this request.

D. If the Commission orders such a study, what guidance on the methodology, contents, and goals should it provide?

If the Commission were to order the Company to conduct a Study using the CUB Illinois one as an example, that Study provides sufficient description of its methodology to guide our efforts. If the Commission prefers a Study different in scope, methods or goals from the CUB Illinois one, guidance on the desired scope, methods and goals would be necessary.

Regarding scope, the Company's working assumption is that any Study should

²¹ The Data Request reads:

The Qualifying Parties respectfully request the provision of customer energy use data meeting the following parameters and conditions:

- 1. Residential customer energy usage data for a minimum of twelve consecutive months and up to thirty-six consecutive months;*
- 2. At intervals of 30 minutes;*
- 3. At the individual meter level;*
- 4. Identified by U.S. Census block group;*
- 5. For all households in Xcel Energy's service area for which a minimum of 12 months' advanced metering data is available; and*
- 6. Which satisfies the 15/15 standard of anonymization adopted by the Commission.*

²² The Data Request was not specific as to which service area. Our calculations here assume it refers to Xcel Energy's service area in Minnesota and not to other states, which would increase the amount of data and cost to anonymize CEUD.

²³ ODAS Section IV.A, Fees and Cost Recovery.

focus on the Company's Minnesota residential customers only, distinguishing between low-income and non-low-income customers to the extent the Company is able (noting that the Company has no comprehensive income data on customers). If the Commission would like the Study to include other customer classes, or other types of customer segmentation than low-income vs. non-low-income and geographic segmentation, then guidance on what types of segmentation and an opportunity to assess the feasibility of such segmentation would be important.

Regarding goals, the CUB Illinois study presents its findings but stops short of policy prescriptions or explicit implications for rate design. The Commission could provide guidance whether the Study conducted here should make recommendations for rate design, or like the CUB Illinois one, simply present findings and leave the discussion of policy implications to occur elsewhere in the record.

E. If the Commission orders such a study, when should Xcel file it and what process should be used to evaluate it?

If the Commission orders such a Study, as discussed above the Company believes it should begin compiling the data no sooner than January 2027, one year after full deployment of AMI. We believe this is the minimum amount of data needed if the Study – whether conducted by the Company or others – is to be the basis for rate design recommendations. If the Company were to undertake it, we believe we would then need 6-9 months to complete the Study.

On completion of the Study, the Study implementer (whether the Company or others) should file it in the current docket. The Commission could then notice a comment period to invite input from stakeholders on the Study's findings, methodology, and potential rate design or other policy implications.

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

The Company has no additional information to provide at this time.

CONCLUSION

Xcel Energy appreciates the opportunity to submit these comments. We believe a study similar to the CUB Illinois one is not needed, as similar findings have already been shown for our Minnesota low-income residential customers; in addition, rate options now exist that address the needs identified in the study. We believe no Commission action is needed at this time regarding the information submitted by the Citizens Utility Board of Minnesota and the University of Minnesota in their February 13, 2025 and March 5, 2025 letters. The Company explained its denial of the February 13, 2025 Data Request in terms of its timing and potential redundancy, and we acted squarely in compliance with the established ODAS, which we intend to do until such time as objective standards are developed for sharing anonymized customer data without the risk of reidentification. Finally, should the Commission order the Company to conduct a study on its own or in collaboration with other parties, compilation of data for the study should begin no sooner than January 2027, allowing any recommendations that emerge from that study to be grounded in at least one full year of AMI data for all of the Company's Minnesota residential customers.

Dated: April 16, 2025

Northern States Power Company

CERTIFICATE OF SERVICE

I, Victor Barreiro, hereby certify that I have this day served copies of the foregoing document on the attached list 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. E002/CI-24-115

Dated this 16th day of April 2025

/s/

Victor Barreiro
Regulatory Administrator

[illegible]

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19	Gail	Baranko	gail.baranko@xcelenergy.com	Xcel Energy		414 Nicollet Mall 7th Floor Minneapolis MN, 55401 United States	Electronic Service		No	24-115Official
20	Max	Baumhefner	mbaumhefner@nrdc.org	Natural Resources Defense Council		111 Sutter St 21st Fl San Francisco CA, 94104 United States	Electronic Service		No	24-115Official
21	Jessica L	Bayles	jessica.bayles@stoel.com	Stoel Rives LLP		1150 18th St NW Ste 325 Washington DC, 20036 United States	Electronic Service		No	24-115Official
22	Mathias	Bell	mathias@weavegrid.com	WeaveGrid		375 Alabama Street, Suite 325 San Francisco CA, 94110 United States	Electronic Service		No	24-115Official
23	David	Bender	dbender@earthjustice.org	Earthjustice		1001 G Street NW Suite 1000 Washington DC, 20001 United States	Electronic Service		No	24-115Official
24	James J.	Bertrand	james.bertrand@stinson.com	STINSON LLP		50 S 6th St Ste 2600 Minneapolis MN, 55402 United States	Electronic Service		No	24-115Official
25	Derek	Bertsch	derek.bertsch@mrenergy.com	Missouri River Energy Services		3724 West Avera Drive PO Box 88920 Sioux Falls SD, 57109-8920 United States	Electronic Service		No	24-115Official
26	Laura	Bishop	laura.bishop@state.mn.us		Minnesota Pollution Control Agency	520 Lafayette Rd Saint Paul MN, 55155 United States	Electronic Service		No	24-115Official
27	Ingrid	Bjorklund	ingrid@bjorklundlaw.com	Bjorklund Law, PLLC		855 Village Center Drive #256 North Oaks MN, 55127 United States	Electronic Service		No	24-115Official

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29	Zoe	Bourgerie	zoe.bourgerie@minneapolismn.gov	Minneapolis City of Lakes		350 S 5th St Rm 307 Minneapolis MN, 55415 United States	Electronic Service		No	24-115Official
30	Kenneth	Bradley	kbradley@environmentminnesota.org			2837 Emerson Ave S Apt CW112 Minneapolis MN, 55408 United States	Electronic Service		No	24-115Official
31	Elizabeth	Brama	ebrama@taftlaw.com	Taft Stettinius & Hollister LLP		2200 IDS Center 80 South 8th Street Minneapolis MN, 55402 United States	Electronic Service		No	24-115Official
32	Jon	Brekke	jbrekke@grenergy.com	Great River Energy		12300 Elm Creek Boulevard Maple Grove MN, 55369-4718 United States	Electronic Service		No	24-115Official
33	Sydney R.	Briggs	sbriggs@swce.coop	Steele-Waseca Cooperative Electric		2411 W. Bridge St PO Box 485 Owatonna MN, 55060-0485 United States	Electronic Service		No	24-115Official
34	Mark B.	Bring	mbring@otpc.com	Otter Tail Power Company		215 South Cascade Street PO Box 496 Fergus Falls MN, 56538-0496 United States	Electronic Service		No	24-115Official
35	Matthew	Brodin	mbrodin@allte.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	24-115Official
36	Janet	Brown	jab5100@gmail.com	Sabathani Community Center (Sabathani/SCC)		310 E 38th St Ste 200 Minneapolis MN, 55409 United States	Electronic Service		No	24-115Official
37	Christina	Brusven	cbrusven@fredlaw.com	Fredrikson Byron		60 S 6th St Ste 1500 Minneapolis MN, 55402-4400 United States	Electronic Service		No	24-115Official
38	James	Canaday	james.canaday@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	Suite 1400 445 Minnesota St. St. Paul MN, 55101 United States	Electronic Service		No	24-115Official
39	Thomas	Carlson	thomas.carlson@edf-re.com	EDF Renewable Energy		10 2nd St NE Ste. 400 Minneapolis MN, 55413 United States	Electronic Service		No	24-115Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
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42	Cody	Chilson	cchilson@greatermngas.com	Greater Minnesota Gas, Inc. & Greater MN Transmission, LLC		1900 Cardinal Ln PO Box 798 Faribault MN, 55021 United States	Electronic Service		No	24- 115Official
43	Ray	Choquette	rchoquette@agp.com	Ag Processing Inc.		12700 West Dodge Road PO Box 2047 Omaha NE, 68103-2047 United States	Electronic Service		No	24- 115Official
44	John	Coffman	john@johncoffman.net	AARP		871 Tuxedo Blvd. St. Louis MO, 63119-2044 United States	Electronic Service		No	24- 115Official
45	Kenneth A.	Colburn	kcolburn@symbioticstrategies.com	Symbiotic Strategies, LLC		26 Winton Road Meredith NH, 32535413 United States	Electronic Service		No	24- 115Official
46	Brent	Coleman	blc@dvclaw.com	Electrify America, LLC		1750 SW Harbor Way Suite 450 Portland OR, 97201 United States	Electronic Service		No	24- 115Official
47	Generic	Commerce Attorneys	commerce.attorneys@ag.state.mn.us		Office of the Attorney General - Department of Commerce	445 Minnesota Street Suite 1400 St. Paul MN, 55101 United States	Electronic Service		Yes	24- 115Official
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49	Grace	Corbin	g.corbin@mpls-synod.org	Eco-Faith Network		122 W Franklin Ave Ste 600 Minneapolis MN, 55404 United States	Electronic Service		No	24- 115Official
50	Hillary	Creurer	hcreurer@allete.com	Minnesota Power		30 W Superior St Duluth MN, 55802 United States	Electronic Service		No	24- 115Official
51	George	Crocker	gwillc@nawo.org	North American Water Office		5093 Keats Avenue Lake Elmo MN, 55042 United States	Electronic Service		No	24- 115Official
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55	Timothy	DenHerder Thomas	timothy@cooperativeenergyfutures.com	Cooperative Energy Futures		3500 Bloomington Ave. S Minneapolis MN, 55407 United States	Electronic Service		No	24-115Official
56	James	Denniston	james.r.denniston@xcelenergy.com	Xcel Energy Services, Inc.		414 Nicollet Mall, 401-8 Minneapolis MN, 55401 United States	Electronic Service		No	24-115Official
57	Carrie	Desmond	carrie.desmond@metrotransit.org	Metropolitan Council		560 6th Avenue North Minneapolis MN, 55411 United States	Electronic Service		No	24-115Official
58	Curt	Dieren	curt.dieren@dgr.com	L&O Power Cooperative		1302 S Union St Rock Rapids IA, 51246 United States	Electronic Service		No	24-115Official
59	Ian M.	Dobson	ian.m.dobson@xcelenergy.com	Xcel Energy		414 Nicollet Mall, 401-8 Minneapolis MN, 55401 United States	Electronic Service		No	24-115Official
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64	Christopher	Droske	christopher.droske@minneapolismn.gov	Northern States Power Company dba Xcel Energy-Elec		661 5th Ave N Minneapolis MN, 55405 United States	Electronic Service		No	24-115Official
65	Brian	Edstrom	briane@cubminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota St Ste W1360 Saint Paul MN, 55101 United States	Electronic Service		No	24-115Official
66	William	Ehrlich	wehrlich@tesla.com	Tesla, Inc.		3500 Deer Creek Rd Palo Alto CA, 94304 United States	Electronic Service		No	24-115Official
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73	Eric	Fehlhaber	efehlhaber@dakotaelectric.com	Dakota Electric Association		4300 220th St W Farmington MN, 55024 United States	Electronic Service		No	24- 115Official
74	Sharon	Ferguson	sharon.ferguson@state.mn.us		Department of Commerce	85 7th Place E Ste 280 Saint Paul MN, 55101- 2198 United States	Electronic Service		No	24- 115Official
75	Mike	Fiterman	mikefiterman@libertydiversified.com	Liberty Diversified International		5600 N Highway 169 Minneapolis MN, 55428- 3096 United States	Electronic Service		No	24- 115Official
76	David A.	Fitzgerald	daf@dvclaw.com	Davison Van Cleve		2321 Fairview Ave E #3 Seattle WA, 98102 United States	Electronic Service		No	24- 115Official
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#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
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81	Patti	Gartland	pgartland@greaterstcloud.com	Greater St. Cloud Development Corp.		501 West St Germain St Ste 100 St. Cloud MN, 56301 United States	Electronic Service		No	24-115Official
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85	Jenny	Glumack	jenny@mrea.org	Minnesota Rural Electric Association		11640 73rd Ave N Maple Grove MN, 55369 United States	Electronic Service		No	24-115Official
86	Anita	Grace	anita@gracemulticultural.com	GRACE Multictlural		12959 196th LN NW Elk River MN, 55330 United States	Electronic Service		No	24-115Official
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94	Matthew B	Harris	matt.b.harris@xcelenergy.com	XCEL ENERGY		401 Nicollet Mall FL 8 Minneapolis MN, 55401 United States	Electronic Service		No	24-115Official
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96	Erik	Hatlestad	erik@cureriver.org			117 1st St Montevideo MN, 56265 United States	Electronic Service		No	24-115Official
97	Kim	Havey	kim.havey@minneapolismn.gov	City of Minneapolis		350 South 5th Street, Suite 315M Minneapolis MN, 55415 United States	Electronic Service		No	24-115Official
98	Philip	Hayet	phayet@jkenn.com	J. Kennedy and Associates, Inc.		570 Colonial Park Drive Suite 305 Roswell GA, 30075-3770 United States	Electronic Service		No	24-115Official
99	Todd	Headlee	theadlee@dvigridsolutions.com	Dominion Voltage, Inc.		701 E. Cary Street Richmond VA, 23219 United States	Electronic Service		No	24-115Official
100	Amber	Hedlund	amber.r.hedlund@xcelenergy.com	Northern States Power Company dba Xcel Energy-Elec		414 Nicollet Mall, 401-7 Minneapolis MN, 55401 United States	Electronic Service		No	24-115Official
101	Adam	Heinen	aheinen@dakotaelectric.com	Dakota Electric Association		4300 220th St W Farmington MN, 55024 United States	Electronic Service		No	24-115Official
102	Annete	Henkel	mui@mnuutilityinvestors.org	Minnesota Utility Investors		413 Wacouta Street #230 St.Paul MN, 55101 United States	Electronic Service		No	24-115Official
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104	Sandra	Henry	sandra.henry@elevatenp.org	Elevate		322 S Green St Ste 300 Chicago IL, 60607 United States	Electronic Service		No	24-115Official
105	Katherine	Hinderlie	katherine.hinderlie@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	445 Minnesota St Suite 1400 St. Paul MN, 55101-2134 United States	Electronic Service		Yes	24-115Official
106	Corey	Hintz	chintz@dakotaelectric.com	Dakota Electric Association		4300 220th Street Farmington MN, 55024-9583 United States	Electronic Service		No	24-115Official
107	Joe	Hoffman	ja.hoffman@smmpa.org	SMMPA		500 First Ave SW Rochester MN, 55902-3303 United States	Electronic Service		No	24-115Official

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108	Michael	Hoppe	lu23@ibew23.org	Local Union 23, I.B.E.W.		445 Etna Street Ste. 61 St. Paul MN, 55106 United States	Electronic Service		No	24-115Official
109	MJ	Horner	mj.horner@xcelenergy.com			null null, null United States	Electronic Service		No	24-115Official
110	Samantha	Houston	shouston@ucsusa.org	Union of Concerned Scientists		1825 K St. NW Ste 800 Washington DC, 20006 United States	Electronic Service		No	24-115Official
111	Lori	Hoyum	lhoyum@mnpower.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	24-115Official
112	Jan	Hubbard	jan.hubbard@comcast.net			7730 Mississippi Lane Brooklyn Park MN, 55444 United States	Electronic Service		No	24-115Official
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115	Casey	Jacobson	cjacobson@bepc.com	Basin Electric Power Cooperative		1717 East Interstate Avenue Bismarck ND, 58501 United States	Electronic Service		No	24-115Official
116	Travis	Jacobson	travis.jacobson@mdu.com	Great Plains Natural Gas Company		400 N 4th St Bismarck ND, 58501 United States	Electronic Service		No	24-115Official
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120	Richard	Johnson	rick.johnson@lawmoss.com	Moss & Barnett		150 S. 5th Street Suite 1200 Minneapolis MN, 55402 United States	Electronic Service		No	24-115Official
121	Sarah	Johnson Phillips	sjphillips@stoel.com	Stoel Rives LLP		33 South Sixth Street Suite 4200 Minneapolis MN, 55402 United States	Electronic Service		No	24-115Official
122	Nate	Jones	njones@hcpd.com	Heartland Consumers Power		PO Box 248 Madison SD, 57042 United States	Electronic Service		No	24-115Official

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123	Philip	Jones	phil@philjonesconsulting.com	Alliance for Transportation Electrification		1402 3rd Ave Ste 1315 Seattle WA, 98101 United States	Electronic Service		No	24-115Official
124	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	24-115Official
125	Bina	Joshi	bina.joshi@afslaw.com	ArentFox Schiff LLP		233 S Wacker Dr Ste 7100 Chicago IL, 60606 United States	Electronic Service		No	24-115Official
126	Dan	Juhl	in.another.account.info@juhlenergy.com	Juhl Energy Inc.		1502 17th St SE Pipestone MN, 56164 United States	Paper Service		No	24-115Official
127	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	24-115Official
128	Michael	Kampmeyer	mkampmeyer@a-e-group.com	AEG Group, LLC		260 Salem Church Road Sunfish Lake MN, 55118 United States	Electronic Service		No	24-115Official
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130	Stacey	Karels	skarels@local563.org	Mankato Area Bldg & Construction Trades Council		310 McKinzie St Mankato MN, 56001 United States	Electronic Service		No	24-115Official
131	William	Kenworthy	will@votesolar.org			1 South Dearborn St Ste 2000 Chicago IL, 60603 United States	Electronic Service		No	24-115Official
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133	Chris	King	chris_king@siemens.com	Siemens		4000 E. Third Ave Suite 400 Foster City CA, 94404 United States	Electronic Service		No	24-115Official
134	Frank	Kohlasch	frank.kohlasch@state.mn.us		Minnesota Pollution Control Agency	520 Lafayette Rd N. St. Paul MN, 55155 United States	Electronic Service		No	24-115Official
135	Brian	Krambeer	bkrambeer@mienergy.coop	MIEnergy Cooperative		PO Box 626 31110 Cooperative Way Rushford MN, 55971 United States	Electronic Service		No	24-115Official
136	Michael	Krause	michaelkrause61@yahoo.com			1200 Plymouth Avenue Minneapolis	Electronic Service		No	24-115Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						MN, 55411 United States				
137	Michael	Krikava	mkrikava@taftlaw.com	Taft Stettinius & Hollister LLP		2200 IDS Center 80 S 8th St Minneapolis MN, 55402 United States	Electronic Service		No	24-115Official
138	Nicolle	Kupser	nkupser@greatermngas.com	Greater Minnesota Gas, Inc.		1900 Cardinal Ln PO Box 798 Faribault MN, 55021 United States	Electronic Service		No	24-115Official
139	Matthew	Lacey	mlacey@greenergy.com	Great River Energy		12300 Elm Creek Boulevard Maple Grove MN, 55369-4718 United States	Electronic Service		No	24-115Official
140	Mary	LaGarde	mlagarde@maicnet.org	Minneapolis American Indian Center		1530 E Franklin Ave Minneapolis MN, 55404 United States	Electronic Service		No	24-115Official
141	Holly	Lahd	holly.lahd@target.com	Target Corporation		33 South 6th St CC-28662 Minneapolis MN, 55402 United States	Electronic Service		No	24-115Official
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145	Kevin	Lee	klee@bluegreenalliance.org	BlueGreen Alliance		2701 University Ave SE Ste. 209 Minneapolis MN, 55414 United States	Electronic Service		No	24-115Official
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147	Annie	Levenson Falk	annielf@cubminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota Street, Suite W1360 St. Paul MN, 55101 United States	Electronic Service		No	24-115Official
148	Ryan	Long	ryan.j.long@xcelenergy.com			414 Nicollet Mall 401 8th Floor Minneapolis MN, 55401 United States	Electronic Service		No	24-115Official
149	Jason	Loos	jason.loos@centerpointenergy.com	CenterPoint Energy Resources Corp.		505 Nicollet Mall 3rd Floor Minneapolis	Electronic Service		No	24-115Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						MN, 55402 United States				
150	Susan	Ludwig	sludwig@mnpower.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	24-115Official
151	Alice	Madden	alice@communitypowermn.org	Community Power		2720 E 22nd St Minneapolis MN, 55406 United States	Electronic Service		No	24-115Official
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154	Katherine	Marshall	katie.marshall@lawmoss.com	Moss & Barnett		150 S 5th St Ste 1200 Minneapolis MN, 55402 United States	Electronic Service		No	24-115Official
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158	Lilly B.	McKenna	lilly.mckenna@stoel.com	Stoel Rives LLP		One Montgomery St Ste 3230 San Francisco CA, 94104 United States	Electronic Service		No	24-115Official
159	Taylor	McNair	taylor@gridlab.org			668 Capp Street San Francisco CA, 94110 United States	Electronic Service		No	24-115Official
160	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	24-115Official
161	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		Yes	24-115Official
162	Thomas	Melone	thomas.melone@allcous.com	Minnesota Go Solar LLC		222 South 9th Street Suite 1600 Minneapolis MN, 55120 United States	Electronic Service		No	24-115Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
176	Mark	Nabong	mnabong@nrdc.org	Natural Resources Defense Council		20 N. Wacker Drive #1600 Chicago IL, 60606 United States	Electronic Service		No	24-115Official
177	Ben	Nelson	benn@cmpasgroup.org	CMMPA		459 South Grove Street Blue Earth MN, 56013 United States	Electronic Service		No	24-115Official
178	Carl	Nelson	cnelson@mncee.org	Center for Energy and Environment		212 3rd Ave N Ste 560 Minneapolis MN, 55401 United States	Electronic Service		No	24-115Official
179	David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency		220 South Sixth Street Suite 1300 Minneapolis MN, 55402 United States	Electronic Service		No	24-115Official
180	Sephra	Ninow	sephra.ninow@energycenter.org	Center for Sustainable Energy		426 17th Street, Suite 700 Oakland CA, 94612 United States	Electronic Service		No	24-115Official
181	Michael	Noble	noble@fresh-energy.org	Fresh Energy		408 Saint Peter St Ste 350 Saint Paul MN, 55102 United States	Electronic Service		No	24-115Official
182	Rolf	Nordstrom	rnordstrom@gpsid.net	Great Plains Institute		2801 21ST AVE S STE 220 Minneapolis MN, 55407-1229 United States	Electronic Service		No	24-115Official
183	Samantha	Norris	samanthanorris@alliantenergy.com	Interstate Power and Light Company		200 1st Street SE PO Box 351 Cedar Rapids IA, 52406-0351 United States	Electronic Service		No	24-115Official
184	Christian	Noyce	christian.noyce@state.mn.us		Public Utilities Commission	759 Hague Ave St Paul MN, 55104 United States	Electronic Service		No	24-115Official
185	David	O'Brien	david.obrien@navigant.com	Navigant Consulting		77 South Bedford St Ste 400 Burlington MA, 01803 United States	Electronic Service		No	24-115Official
186	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	24-115Official
187	Ric	O'Connell	ric@gridlab.org	GridLab		2120 University Ave Berkeley CA, 94704 United States	Electronic Service		No	24-115Official
188	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	24-115Official
189	Matthew	Olsen	molsen@otpc.com	Otter Tail Power Company		215 South Cascade Street Fergus Falls	Electronic Service		No	24-115Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						MN, 56537 United States				
190	Russell	Olson	rolson@hcpd.com	Heartland Consumers Power District		PO Box 248 Madison SD, 57042-0248 United States	Electronic Service		No	24-115Official
191	Debra	Opatz	dopatz@otpc.com	Otter Tail Power Company		215 South Cascade Street Fergus Falls MN, 56537 United States	Electronic Service		No	24-115Official
192	Nate	OReilly	nate@iron512.com			851 Pierce Butler Route St Paul MN, 55104 United States	Electronic Service		No	24-115Official
193	Carol A.	Overland	overland@legalelectric.org	Legalelectric - Overland Law Office		1110 West Avenue Red Wing MN, 55066 United States	Electronic Service		No	24-115Official
194	John	Pacheco	johnpachecojr@gmail.com			null null, null United States	Electronic Service		No	24-115Official
195	Greg	Palmer	gpalmer@greatermngas.com	Greater Minnesota Gas, Inc.		1900 Cardinal Ln PO Box 798 Faribault MN, 55021 United States	Electronic Service		No	24-115Official
196	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	24-115Official
197	Audrey	Partridge	audrey.peer@centerpointenergy.com	CenterPoint Energy Minnesota Gas		212 3rd Ave. N. Suite 560 Minneapolis MN, 55401 United States	Electronic Service		No	24-115Official
198	Dan	Patry	dpatry@sunedison.com	SunEdison		600 Clipper Drive Belmont CA, 94002 United States	Electronic Service		No	24-115Official
199	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	24-115Official
200	Jose	Perez	jose@hispanicsinenergy.com			1017 L Street #719 Sacramento CA, 95814 United States	Electronic Service		No	24-115Official
201	Jennifer	Peterson	jjpeterson@mnpower.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	24-115Official
202	Catherine	Phillips	catherine.phillips@wecenergygroup.com	Minnesota Energy Resources		231 West Michigan St Milwaukee WI, 53203 United States	Electronic Service		No	24-115Official
203	Marcia	Podratz	mpodratz@mnpower.com	Minnesota Power		30 W Superior S Duluth MN, 55802 United States	Electronic Service		No	24-115Official

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204	Hannah	Polikov	hpolikov@aee.net	Advanced Energy Economy Institute		1000 Vermont Ave, Third Floor Washington DC, 20005 United States	Electronic Service		No	24-115Official
205	J.	Porter	greg.porter@nngco.com	Northern Natural Gas Company		1111 South 103rd St Omaha NE, 68124 United States	Electronic Service		No	24-115Official
206	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	24-115Official
207	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	24-115Official
208	Kenneth	Rance	krance@sabathani.org	Sabathani Community Center		310 East 38th St Rm #120 Minneapolis MN, 55409 United States	Electronic Service		No	24-115Official
209	John C.	Reinhardt		Laura A. Reinhardt		3552 26th Ave S Minneapolis MN, 55406 United States	Paper Service		No	24-115Official
210	Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	1400 BRM Tower 445 Minnesota St St. Paul MN, 55101-2131 United States	Electronic Service		Yes	24-115Official
211	Kevin	Reuther	kreuther@mncenter.org	MN Center for Environmental Advocacy		26 E Exchange St, Ste 206 St. Paul MN, 55101-1667 United States	Electronic Service		No	24-115Official
212	John	Reynolds	john.reynolds@nfib.org			180 5th St E Suite 260 St. Paul MN, 55101 United States	Electronic Service		No	24-115Official
213	Whitney	Richardson	whitney.richardson@evgo.com	EVgo Services, LLC		11835 W Olympic Blvd Ste 900E Los Angeles CA, 90064 United States	Electronic Service		No	24-115Official
214	Noah	Roberts	nroberts@cleanpower.org	Energy Storage Association		1155 15th St NW, Ste 500 Washington DC, 20005 United States	Electronic Service		No	24-115Official
215	Alice	RobertsDavis	admin.info@state.mn.us	Department of Administration		15 Sherburne Avenue St. Paul MN, 55155 United States	Electronic Service		No	24-115Official
216	Susan	Romans	sromans@allete.com	Minnesota Power		30 West Superior Street Legal Dept Duulth MN, 55802 United States	Electronic Service		No	24-115Official
217	Amanda	Rome	amanda.rome@xcelenergy.com	Xcel Energy		414 Nicollet Mall FL 5 Minneapolis	Electronic Service		No	24-115Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
232	Will	Seuffert	will.seuffert@state.mn.us		Public Utilities Commission	121 7th PI E Ste 350 Saint Paul MN, 55101 United States	Electronic Service		Yes	24-115Official
233	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	24-115Official
234	Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates		7400 Lyndale Ave S Ste 190 Richfield MN, 55423 United States	Electronic Service		No	24-115Official
235	Patricia	Sharkey	psharkey@environmentallawcounsel.com	Midwest Cogeneration Association.		180 N LaSalle St Ste 3700 Chicago IL, 60601 United States	Electronic Service		No	24-115Official
236	Bria	Shea	bria.e.shea@xcelenergy.com	Xcel Energy		414 Nicollet Mall Minneapolis MN, 55401 United States	Electronic Service		No	24-115Official
237	Doug	Shoemaker	dougs@charter.net	Minnesota Renewable Energy		2928 5th Ave S Minneapolis MN, 55408 United States	Electronic Service		No	24-115Official
238	Anne	Smart	anne.smart@chargepoint.com	ChargePoint, Inc.		254 E Hacienda Ave Campbell CA, 95008 United States	Electronic Service		No	24-115Official
239	Amanda	Smith	amanda.smith@state.mn.us		Minnesota Pollution Control Agency	520 Lafayette Rd N St. Paul MN, 55155 United States	Electronic Service		No	24-115Official
240	Beth	Smith	bsmith@greatermankato.com	Greater Mankato Growth		1961 Premier Dr Ste 100 Mankato MN, 56001 United States	Electronic Service		No	24-115Official
241	Joshua	Smith	joshua.smith@sierraclub.org			85 Second St FL 2 San Francisco CA, 94105 United States	Electronic Service		No	24-115Official
242	Ken	Smith	ken.smith@ever-greenenergy.com	Ever Green Energy		305 Saint Peter St Saint Paul MN, 55102 United States	Electronic Service		No	24-115Official
243	Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.		76 W Kellogg Blvd St. Paul MN, 55102 United States	Electronic Service		No	24-115Official
244	Trevor	Smith	trevor.smith@avantenergy.com	Avant Energy, Inc.		220 South Sixth Street Suite 1300 Minneapolis MN, 55402 United States	Electronic Service		No	24-115Official
245	Beth	Soholt	bsoholt@cleangridalliance.org	Clean Grid Alliance		570 Asbury Street Suite 201 St. Paul MN, 55104 United States	Electronic Service		No	24-115Official
246	Anna	Sommer	asommer@energyfuturesgroup.com	Energy Futures Group		PO Box 692 Canton NY, 13617 United States	Electronic Service		No	24-115Official

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247	Peggy	Sorum	peggy.sorum@centerpointenergy.com	CenterPoint Energy		505 Nicollet Mall Minneapolis MN, 55402 United States	Electronic Service		No	24-115Official
248	Mark	Spurr	mspurr@fvbenergy.com	International District Energy Association		222 South Ninth St., Suite 825 Minneapolis MN, 55402 United States	Electronic Service		No	24-115Official
249	Sky	Stanfield	stanfield@smwlaw.com	Shute, Mihaly & Weinberger		396 Hayes Street San Francisco CA, 94102 United States	Electronic Service		No	24-115Official
250	Jamez	Staples	jstaples@renewableenrgpartners.com	Renewable Energy Partners		3033 Excelsior Blvd S Minneapolis MN, 55416 United States	Electronic Service		No	24-115Official
251	Russ	Stark	russ.stark@ci.stpaul.mn.us	City of St. Paul		Mayor's Office 15 W. Kellogg Blvd., Suite 390 Saint Paul MN, 55102 United States	Electronic Service		No	24-115Official
252	Byron E.	Starns	byron.starns@stinson.com	STINSON LLP		50 S 6th St Ste 2600 Minneapolis MN, 55402 United States	Electronic Service		No	24-115Official
253	Richard	Stasik	richard.stasik@wecenergygroup.com	Minnesota Energy Resources Corporation (HOLDING)		231 West Michigan St - P321 Milwaukee WI, 53203 United States	Electronic Service		No	24-115Official
254	Kristin	Stastny	kstastny@taftlaw.com	Taft Stettinius & Hollister LLP		2200 IDS Center 80 South 8th Street Minneapolis MN, 55402 United States	Electronic Service		No	24-115Official
255	Lindsey	Stegall	lindsey.stegall@evgo.com	EVgo Services, LLC		11835 W Olympic Blvd Ste 900E Los Angeles CA, 90064 United States	Electronic Service		No	24-115Official
256	Cary	Stephenson	cstephenson@otpc.com	Otter Tail Power Company		215 South Cascade Street Fergus Falls MN, 56537 United States	Electronic Service		No	24-115Official
257	James M	Strommen	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered		150 S 5th St Ste 700 Minneapolis MN, 55402 United States	Electronic Service		No	24-115Official
258	Eric	Swanson	eswanson@winthrop.com	Winthrop & Weinstine		225 S 6th St Ste 3500 Capella Tower Minneapolis MN, 55402-4629 United States	Electronic Service		No	24-115Official
259	Dean	Taylor	dtaylor@pluginamerica.org	Plug In America		6380 Wilshire Blvd, Suite 1000 Los Angeles CA, 90048 United States	Electronic Service		No	24-115Official

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273	Jenna	Warmuth	jwarmuth@mnpower.com	Minnesota Power		30 W Superior St Duluth MN, 55802-2093 United States	Electronic Service		No	24-115Official
274	Darrell	Washington	darrell.washington@state.mn.us		DOT	null null, null United States	Electronic Service		No	24-115Official
275	Laurie	Williams	laurie.williams@sierraclub.org	Sierra Club		Environmental Law Program 1536 Wynkoop St Ste 200 Denver CO, 80202 United States	Electronic Service		No	24-115Official
276	Justin	Wilson	justin.wilson@chargepoint.com	ChargePoint		240 East Hacienda Ave. Campbell CA, 95008 United States	Electronic Service		No	24-115Official
277	Joseph	Windler	jwindler@winthrop.com	Winthrop & Weinstine		225 South Sixth Street, Suite 3500 Minneapolis MN, 55402 United States	Electronic Service		No	24-115Official
278	Robyn	Woeste	robynwoeste@alliantenergy.com	Interstate Power and Light Company		200 First St SE Cedar Rapids IA, 52401 United States	Electronic Service		No	24-115Official
279	Yochi	Zakai	yzakai@smwlaw.com	SHUTE, MIHALY & WEINBERGER LLP		396 Hayes Street San Francisco CA, 94102 United States	Electronic Service		No	24-115Official
280	Alicia	Zaloga	azaloga@keyesfox.com	Keyes & Fox, LLP		1155 Kildaire Farm Rd Ste 202-203 Cary NC, 27511 United States	Electronic Service		No	24-115Official
281	Christopher	Zibart	czibart@atcllc.com	American Transmission Company LLC		W234 N2000 Ridgeview Pkwy Court Waukesha WI, 53188-1022 United States	Electronic Service		No	24-115Official
282	Kurt	Zimmerman	kwz@ibew160.org	Local Union #160, IBEW		2909 Anthony Ln St Anthony Village MN, 55418-3238 United States	Electronic Service		No	24-115Official
283	Patrick	Zomer	pat.zomer@lawmoss.com	Moss & Barnett PA		150 S 5th St #1200 Minneapolis MN, 55402 United States	Electronic Service		No	24-115Official