



414 Nicollet Mall
Minneapolis, Minnesota 55401

December 15, 2017

—Via Electronic Filing—

Daniel P. Wolf
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101

RE: REPLY COMMENTS
RENEWABLE DEVELOPMENT FUND ANNUAL REPORT, TRACKER ACCOUNT
TRUE-UP AND REQUEST NEW 2018 RIDER FACTOR
DOCKET NO. E002/M-17-712

Dear Mr. Wolf:

Northern States Power Company, doing business as Xcel Energy, submits to the Minnesota Public Utilities Commission this Reply to the November 22, 2017 Comments of the Minnesota Department of Commerce and comments received from other parties within this docket. We appreciate the Department's review of our Petition as well as the comments submitted by other parties.

We have electronically filed this document with the Commission, and copies of the summary have been served on the parties on the attached service list.

Please contact me at (612) 330-6270 or allen.krug@xcelenergy.com if you have any questions regarding this filing.

Sincerely,

/s/

ALLEN D. KRUG
ASSOCIATE VICE PRESIDENT, STATE REGULATORY POLICY

Enclosures
c: Service List

STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION

Nancy Lange	Chair
Dan Lipschultz	Commissioner
Matt Schuerger	Commissioner
Katie J. Sieben	Commissioner
John A. Tuma	Commissioner

IN THE MATTER OF THE PETITION OF
NORTHERN STATES POWER COMPANY
FOR APPROVAL OF THE 2017
RENEWABLE DEVELOPMENT FUND
ANNUAL REPORT, TRACKER ACCOUNT
TRUE-UP, AND 2018 RATE RIDER
FACTOR

DOCKET No. E002/M-17-712

REPLY COMMENTS

INTRODUCTION

Northern States Power Company, doing business as Xcel Energy, submits to the Minnesota Public Utilities Commission this Reply to the November 22, 2017 Comments of the Minnesota Department of Commerce and comments received from other parties within this docket. We appreciate the Department's review of our Petition as well as the comments submitted by parties.

A. 2018 RDF Rate Rider Factor

The Company appreciates the Department laying out four different approaches to calculate the amount of the 2018 RDF Factor. The RDF Factor is comprised of four major elements of costs related to: Legislative Mandates; Grant Disbursements; 2017 True-up Expenses; and Administrative Costs. (For reference, Table 1 of our Initial Petition provides a breakout of these four major elements.)

The differences between the Department's four approaches to calculating the 2018 RDF Factor relates to one of the Legislative Mandates—the estimated amount of the transfer(s) to the Minnesota Department of Management and Budget (MMB). The Company believes working through the four options raises two questions, which we will address in this section of our reply:

- What is the estimated amount of the 2018 transfer to MMB under Minn. Stat. § 116C.779 subdivision 1(e)?
- Should the Company include additional amounts (i.e., the December 31, 2017 unencumbered balance and grant funds encumbered for Crown Hydro) in the transfer to MMB?

Table 1: Derivation of Amount of 2018 transfer to MMB under Options 1-4

	Estimated Amount of 2018 transfer to MMB under Minn. Stat. § 116C.779(1)(e) (Column A)	Transfer to MMB the December 31, 2017 Unencumbered Balance ¹ (Column B)	Transfer to MMB the Amount Encumbered for Crown Hydro (Column C)	Forecast Transfer to MMB (Columns A+B+C)
Option 1	\$ 14,925,034	-	-	\$ 14,925,034
Option 2	\$ 8,817,885	-	-	\$ 8,817,885
Option 3	\$ 8,817,885	\$ 21,730,528	-	\$ 30,548,413
Option 4	\$ 8,817,885	\$ 21,730,528	\$ 3,551,409	\$ 34,109,822

¹ Includes forecast payments for November and December

Table 2: Resulting 2018 RDF Factors

	Forecast Transfer to MMB (Column A)	Other RDF Expenses included in 2018 RDF Factor (Column B)	Total 2018 RDF Expenses to be Recovered (Columns A+B)	Amount of 2018 RDF Factor (\$/kWh)
Option 1	\$ 14,925,034	\$30,627,900	\$45,552,934	\$ 0.001522
Option 2	\$ 8,817,885	\$30,627,900	\$39,445,785	\$ 0.001318
Option 3	\$ 30,548,413	\$30,627,900	\$61,176,313	\$ 0.002044
Option 4	\$ 34,109,822	\$30,627,900	\$64,737,722	\$ 0.002163

The Company confirms that the Department's calculations of the resulting 2018 RDF Factor presented in Table 2 above are correct and we have provided our calculations in Attachments A-D.

As described in more detail below, we agree with the Department's Option 2. We believe that transferring to MMB the December 31, 2017 unencumbered balance is not required by law and unnecessarily raises costs to our customers. While Option 4 calculates the financial impact of cancelling the Crown Hydro RDF project, we will address all issues related to Crown Hydro in Section C.

- 1. What is the estimated amount of the 2018 transfer to MMB under Minn. Stat. § 116C.779 subdivision 1(e)?**

Upon further review of our calculations, we believe the estimated amount of the 2018 transfer to MMB should be \$8,817,885, consistent with Department Option 2.

Under Minn. Stat. § 116C.779 subdivisions 1(c) and (d), the Company obligation to the renewable development account is connected to the number of dry casks containing spent fuel located at either Prairie Island or Monticello. In our Initial Petition, we explained that our anticipated obligation for the storage of dry casks located at Prairie Island and Monticello in 2018 is \$31,500,000.

Under Minn. Stat. § 116C.779 subdivision 1(e), the Company “shall withhold from the funds transferred to the renewable development account under paragraphs (c) and (d) the amount necessary to pay its obligations under paragraphs (f) and (g) and sections 116C.7792 and 216C.41, for that calendar year.”

Table 3: 2018 MMB transfer calculation

2018 RDF Obligation	+ \$31,500,000
Old Solar*Rewards (116C.7791)	- \$2,246,317
New Solar*Rewards (116C.7792)	- \$2,215,979
REPI (216C.41)	- \$619,819
FY 2018 City of Benson Payment (116C.779(1)(f))	- \$4,000,000
FY2018 and FY 2019 Laurentian Payment (116C.779(1)(g))	- \$13,600,000
2018 Transfer to MMB	= \$8,817,885

While Minn. Stat. § 116C.779 subdivision 1(e) does not explicitly list the statutory provision for the Old Solar*Rewards program (Minn. Stat. § 116C.7791), we believe it is proper to withhold that amount from the estimate of the 2018 transfer to MMB.

The Old Solar*Rewards program ran from 2011 until it was fully subscribed on March 28, 2014. The program gave qualifying customers rebates in five consecutive annual installments. The 2018 disbursements related to the Old Solar*Rewards program are honoring contracts that were received prior to March 28, 2014. After 2020, there will be no disbursements under the Old Solar*Reward program.

The Company’s obligations under the Old Solar*Rewards program was not listed in either subdivision governing transfers to the MMB, but the Company continues

to have a legislative mandate to pay qualifying customers. Since Minn. Stat. § 116C.779 subdivision 1(e) allows the Company to withhold money for legislative mandates “in the calendar year”, we believe it is consistent with the intent of the statute to withhold the amounts related to the Old Solar*Rewards program even though it is not explicitly listed.

2. Should the Company include an additional amount (i.e., the December 31, 2017 unencumbered balance and grant funds encumbered for Crown Hydro) in the transfer to MMB?

As stated in the Company’s Initial Petition, and its November 22, 2017 Comments, the Company did not make a 2017 transfer to MMB pursuant to Minn. Stat. § 116C.779 subdivision 1(b) because there were no “funds in the renewable development account” that were unexpended or unencumbered. On that principle, and because it would unnecessarily increase customer costs, the Company disagrees with Options 3 and 4 (as mentioned above Crown Hydro will be separately addressed below).

Pursuant to Minn. Stat. § 216B.1645, “[t]he expenses *incurred* by the utility over the duration of the approved contract or useful life of the investment and expenditures made pursuant to the [RDF Statute] shall be recovered from the ratepayers of the utility, to the extent they are not offset by utility revenues attributable to the contracts, investments, or expenditure.” Pursuant to the Commission’s April 20, 2001 Order in Docket No. E002/M-00-1583, the annual RDF obligation is a *liability* that is deferred until the costs are actually *incurred*. Therefore, on July 1, 2017, the Company had only a deferred liability, but no actual “funds in the renewable development account” to transfer to the MMB. The transfer of a liability is not authorized by the statute. As explained in our November 22, 2017 Comments, the Company notified the MMB of its determination; the MMB has not objected to the Company’s determination.

Furthermore, the statutory calculation of the amount to transfer to the MMB is not a true-up mechanism for including any unencumbered cumulative balance or over-encumbered cumulative balance from the previous year. Based upon the forecast values provided in our Initial Petition, the Department has correctly calculated a forecast of the unencumbered cumulative RDF balance as of December 31, 2017 under Options 3 and 4. The Company, however, objects to including those amounts in the calculation of the 2018 RDF Factor because it is not required by law unnecessarily raises costs to our customers.

However, if the Commission determines that Minn. Stat. § 116C.779 subdivision 1(b) did require a 2017 transfer to MMB or that the unencumbered balance and encumbered amount for Crown Hydro should be transferred to MMB, then under Minn. Stat. § 216B.1645 that expenditure shall be recovered from our customers.

B. Administrative Expenses

The Department requested the Company provide in reply comments how administrative costs would be tracked and adjusted as necessary going forward.

By way of background, the five percent administrative cost cap was first established by the Commission in its April 20, 2001 Order in Docket No. E002/M-00-1583. In 2012, the legislature amended the RDF Statute codifying into law many aspects of the RDF process that the Commission had established over time in its orders, including a sentence about the recovery of administrative expenses.

Prior to the enactment of 2017 Session Laws, Chapter 94, Minn. Stat § 116C.779 subdivision 1(e) read in pertinent part: “The commission may approve reasonable and necessary expenditures for administering the account in an amount not to exceed five percent of expenditures.” This sentence was struck in 2017 Session Laws, Chapter 94, but the administrative expenses related to the RDF did not go away. Since the Commission previously authorized the recovery of a limited amount of administrative expenses through Commission order, the Company proposes that RDF administrative expenses for existing RDF awards from Cycle 1 through Cycle 4 will continue to be tracked through the RDF tracker account and recovered through the RDF rider factor as currently established (meaning the 5% administrative cap will remain in effect). In the 2018 RDF Factor, the Company has included \$28,009 in administrative expenses. Currently there are twenty active RDF projects and four RDF contracts that are being negotiated, totaling \$26.0 M in obligated funds. Resources are still necessary to properly administer these existing obligations.

On a going forward basis (which is sometimes referred to as the RDA instead of the RDF), much of the work that drove administrative expenses (namely, developing a request for proposal and hiring an independent evaluator) were transferred to the advisory group, as an excerpt from 2017 Session Law Chapter 94 shows:

~~The advisory group must be consulted with respect to the general scope of expenditures in designing~~ design a request for proposal

and ~~in evaluating~~ evaluate projects submitted in response to a request for proposals. ~~In addition to consulting with~~ The advisory group, ~~the public utility~~ must utilize an independent third-party expert to evaluate proposals submitted in response to a request for proposal, including all proposals made by the public utility.

While the Company will continue to assist with the administration of the RDA, the advisory group (or the Company on its behalf) will need funding to perform the work required under the 2017 legislation. There are no RDA administrative costs in the 2018 RDF Factor, and therefore the Commission need not make a decision how those administrative costs will be tracked and adjusted in this docket. In Section D below, we recommend the Commission open a generic docket or notice and comment period on how to address certain aspects of the 2017 legislation, including among other issues, this issue of administrative costs. The Company is interested in working with the Commission, Department and other interested stakeholders to use lessons learned from administration of the RDF to develop the necessary RDA administrative process, procedures, and cost recovery.

C. Crown Hydro Project

The Company has reviewed the comments submitted by interested parties concerning the Crown Hydro RDF project. The Company takes no position on whether any Commission action is needed under Minnesota Laws 2017, Chapter 94, Article 10, Section 29, or should otherwise be taken.

There were a number of comments regarding the Third Amendment to the Renewable Development Fund Grant Contract Terms and Conditions by and between Crown Hydro LLC and Northern States Power Company, dated June 15, 2007 (the Third Amendment), which effectively modified the timeline for the project, calculating the dates for contract milestones on the on “acquisition of the project property sufficient to comply with Federal Energy Regulatory Commission requirements.” For example, under the Third Amendment, Crown Hydro should achieve Milestone 4 two hundred days (as opposed to a date certain) after it acquires the Project property. Since the outstanding RDF contract milestones (Milestones 4 through 8) relate to construction, installation, and commissioning of the facility, FERC approval of Crown Hydro’s permit amendment is an important step in it achieving the remaining milestones.

The Third Amendment also stated:

In the event acquisition of Project property has not occurred by 10/31/2007, Contractor shall present a detailed report regarding acquisition plan and efforts necessary to achieve acquisition of property and provide an updated draft amendment to Xcel Energy for review.

After October 31, 2007, Crown Hydro reported, and has continued to report in its status reports, on its ongoing efforts to achieve acquisition of property for its project, but based on our records, we do not believe Crown Hydro provided a draft amendment to the Company for its review. In light of this, if the Commission does wish to direct any action regarding the Crown Hydro RDF project, one option would be to direct the Company and Crown Hydro enter into another contract amendment that provides specific dates (or a certain amount of time) by which Crown Hydro will meet the outstanding milestones.

The Third Amendment is different from RDF Contract Amendments from subsequent cycles that extended timelines. The Third Amendment bases the timeline for meeting milestones on an event (site acquisition) that is planned to happen at some point in the future whereas, Cycle 4 contract amendments that change a project schedule do so by identifying a certain amount of time (for example, an additional year) for the extension.

According to Commission precedent,¹ schedule changes need not be approved by the Commission, but they must be filed, so that interested stakeholders know of

¹ In the Commission's June 28, 2005 Order Setting Rider, Approving Contract Amendments and Process for Future Amendments, and Requiring Continued Reporting in Docket No. E002/M-05-109, the Commission found the Company's regulatory framework for amending RDF contracts reasonable and approved it. Under that framework, the level of documentation and regulatory review is dependent on the type of change proposed to the RDF contract. Stated briefly:

Type 1 amendments include administrative changes, such as correcting typographical errors and clarification of contract terms. For this type of change, an amendment to the contract is not required, but documentation of the change and demonstration that there was agreement between the parties is required.

Type 2 amendments include minor contract amendments, including such things as schedule changes for justifiable reasons, reorder or reshipment of specified equipment to correct for contracting errors, delays in completion of routine research progress work reports, and minor changes in work scope. For this type of change, a formal amendment to the RDF contract is required.

Type 3 amendments include more material modifications, including such things as significant changes in the Contractor's scope of work, material modifications of technology and/or equipment to be installed for the RDF project, significant change of contractor, or remediation

the extension in the project timeline. The Company customarily files any contract amendments with its RDF Quarterly Reports.

D. Request for Generic Proceeding/Notice and Comment Period on 2017 Legislation

As demonstrated by this docket, the 2017 legislation made a number of changes to the RDF that impact not only the 2018 RDF Rate Rider and tracking of administrative costs, but also administration of the RDA, the composition of the RDA advisory group, and how projects will be awarded funding from the Renewable Development Account into the future.

The grant award process contemplated under newly enacted Minn. Stat. § 116C.779 subdivision 1(l), (m), and (n) culminates with the Commission presenting “its recommended appropriations from the account to the senate and house of representatives committees with jurisdiction over energy policy and finance annually by February 15.” Given the relative recent passage of the 2017 legislation and lack of detail in the statute, the Company will not be able to provide recommendation of projects for funding to the Commission prior to February 2018.

In addition, there are a number of selection processes that need to be developed such as who is on the RDA advisory group, how are administrative costs for the advisory group’s independent evaluator paid, and whether the Company and advisory group should continue to use the procedural steps for funding cycles laid out in the Commission’s February 6, 2013 Order in Docket No. E002/M-12-1278. Therefore, the Company seeks the Commission’s guidance on how to proceed with establishing the process and procedures for the selection of projects to be funded through the RDA, and respectfully requests that the Commission open a generic proceeding or notice and comment period on these issues.

CONCLUSION

We appreciate the Department’s review of our petition and hope the additional information we provide in these Reply Comments meets the Department’s requests for further clarification and information. We respectfully request that the Commission approve a change to the RDF Rate Rider Factor from \$0.001034 per kWh to \$0.001318 per kWh effective January 1, 2018. We will continue to apply

for defective work. For this type of change, the Company first seeks the RDF advisory group’s support for the change and then files the amendment with the Commission for approval.

the RDF Rate Rider Factor to all Minnesota customers who are subject to service under the Fuel Clause Rider and who take service under the Windsource Program rider.

Finally, pursuant to the Commission's June 11, 2004 and March 17, 2011 Orders, we request Commission approval of the RDF compliance report submitted with our September 29, 2017 filing.

Dated: December 15, 2017

Northern States Power Company

STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION

Nancy Lange	Chair
Dan Lipschultz	Commissioner
Matt Schuerger	Commissioner
Katie J. Sieben	Commissioner
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IN THE MATTER OF THE PETITION OF
NORTHERN STATES POWER COMPANY
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RENEWABLE DEVELOPMENT FUND
ANNUAL REPORT, TRACKER ACCOUNT
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FACTOR

DOCKET No. E002/M-17-712

REPLY COMMENTS

SUMMARY OF FILING

Please take notice that on December 15, 2017 Northern States Power Company, doing business as Xcel Energy, filed with the Minnesota Public Utilities Commission reply comments to the November 22, 2017 comments of the Minnesota Department of Commerce and comments received from other parties within this docket.

**2018 RDF Rate Rider Reply Comment
Attachment List**

Attachment	Description
Attachment 1	2018 RDF Rider Calculation – Option 1
Attachment 2	2018 RDF Rider Calculation – Option 2
Attachment 3	2018 RDF Rider Calculation – Option 3
Attachment 4	2019 RDF Rider Calculation – Option 4

RENEWABLE DEVELOPMENT FUND
2018 Rider Calculation - Option 1
 State of Minnesota Recovery

2018 RDF Expenses

	Forecast Jan 2018	Forecast Feb 2018	Forecast Mar 2018	Forecast Apr 2018	Forecast May 2018	Forecast Jun 2018	Forecast Jul 2018	Forecast Aug 2018	Forecast Sep 2018	Forecast Oct 2018	Forecast Nov 2018	Forecast Dec 2018	Total
Category A Projects - EP	\$ 969,741	\$ 1,850,000	\$ -	\$ -	\$ 1,650,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 4,469,741
Category B Projects - R&D and HE	\$ 81,742	\$ 656,606	\$ 27,260	\$ 178,155	\$ 1,077,260	\$ 255,629	\$ -	\$ 136,206	\$ 640,657	\$ 119,860	\$ 89,272	\$ 541,303	\$ 3,803,950
Other Legis Mandates	\$ 22,251,067	\$ 4,735,720	\$ 350,385	\$ 1,244,206	\$ 222,844	\$ 238,015	\$ 6,966,981	\$ 298,844	\$ 139,191	\$ 183,512	\$ 172,374	\$ 184,191	\$ 36,987,330
REPI	\$ 51,652	\$ 51,652	\$ 51,652	\$ 51,652	\$ 51,652	\$ 51,652	\$ 51,652	\$ 51,652	\$ 51,652	\$ 51,652	\$ 51,652	\$ 51,652	\$ 619,819
Total Project Costs	\$ 23,354,202	\$ 7,293,978	\$ 429,297	\$ 1,474,013	\$ 3,001,756	\$ 545,296	\$ 7,018,633	\$ 486,702	\$ 831,500	\$ 355,024	\$ 313,298	\$ 777,146	\$ 45,880,840
Total Admin Costs	\$ 1,000	\$ 1,000	\$ 1,000	\$ 1,000	\$ 1,000	\$ 1,000	\$ 5,000	\$ 12,800	\$ 3,000	\$ 2,000	\$ 1,000	\$ 500	\$ 30,300
Total RDF Expense	\$ 23,355,202	\$ 7,294,978	\$ 430,297	\$ 1,475,013	\$ 3,002,756	\$ 546,296	\$ 7,023,633	\$ 499,502	\$ 834,500	\$ 357,024	\$ 314,298	\$ 777,646	\$ 45,911,140

MN State Sales Allocator	83.2752%	83.1791%	83.1328%	82.7031%	83.2589%	84.0328%	84.5876%	84.4047%	84.1200%	83.1789%	83.0443%	83.1268%	
MN Administrative Cost Allocator	92.0787%	92.0332%	92.0113%	91.8078%	92.0710%	92.4375%	92.7003%	92.6137%	92.4788%	92.0331%	91.9694%	92.0084%	

2018 RDF Rider Recovery

	Forecast Jan 2018	Forecast Feb 2018	Forecast Mar 2018	Forecast Apr 2018	Forecast May 2018	Forecast Jun 2018	Forecast Jul 2018	Forecast Aug 2018	Forecast Sep 2018	Forecast Oct 2018	Forecast Nov 2018	Forecast Dec 2018	Total
Category A Projects - EP	\$ 807,554	\$ 1,538,813	\$ -	\$ -	\$ 1,373,772	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 3,720,139
Category B Projects - R&D and HE	\$ 81,742	\$ 656,606	\$ 27,260	\$ 178,155	\$ 1,077,260	\$ 255,629	\$ -	\$ 136,206	\$ 640,657	\$ 119,860	\$ 89,272	\$ 541,303	\$ 3,803,950
Other Legis Mandates	\$ 22,251,067	\$ 4,735,720	\$ 350,385	\$ 1,244,206	\$ 222,844	\$ 238,015	\$ 6,966,981	\$ 298,844	\$ 139,191	\$ 183,512	\$ 172,374	\$ 184,191	\$ 36,987,330
REPI	\$ 51,652	\$ 51,652	\$ 51,652	\$ 51,652	\$ 51,652	\$ 51,652	\$ 51,652	\$ 51,652	\$ 51,652	\$ 51,652	\$ 51,652	\$ 51,652	\$ 619,819
Administrative Costs (1)	\$ 921	\$ 920	\$ 920	\$ 918	\$ 921	\$ 924	\$ 4,635	\$ 11,855	\$ 2,774	\$ 1,841	\$ 920	\$ 460	\$ 28,009
Expense Recovery	\$ 23,192,935	\$ 6,983,711	\$ 430,217	\$ 1,474,931	\$ 2,726,448	\$ 546,220	\$ 7,023,268	\$ 498,556	\$ 834,274	\$ 356,864	\$ 314,217	\$ 777,606	\$ 45,159,247

Total 2018 RDF Expense Recovery	\$ 45,159,247
2017 True-up Amount to be Included in the Calculation of the 2018 RDF Rider	\$ 393,687
Total Amount to be Recovered Through the 2018 Rider	\$ 45,552,934

2018 RDF Rider Calculation

	Forecast Jan 2018	Forecast Feb 2018	Forecast Mar 2018	Forecast Apr 2018	Forecast May 2018	Forecast Jun 2018	Forecast Jul 2018	Forecast Aug 2018	Forecast Sep 2018	Forecast Oct 2018	Forecast Nov 2018	Forecast Dec 2018	Total
2018 MN Calendar Month kWh Sales	2,594,773,782	2,261,065,592	2,425,331,705	2,129,340,505	2,352,992,692	2,601,408,301	2,995,556,264	2,904,155,357	2,499,917,187	2,378,928,194	2,280,766,491	2,511,567,263	29,935,803,334
2018 Minnesota RDF Rider Factor												\$ 0.001522	

2018 RDF Tracker Calculation

	Forecast Jan 2018	Forecast Feb 2018	Forecast Mar 2018	Forecast Apr 2018	Forecast May 2018	Forecast Jun 2018	Forecast Jul 2018	Forecast Aug 2018	Forecast Sep 2018	Forecast Oct 2018	Forecast Nov 2018	Forecast Dec 2018	Total
Previous Year True-Up	\$ 393,687												\$ 393,687
Actual Expenses	\$ 23,192,935	\$ 6,983,711	\$ 430,217	\$ 1,474,931	\$ 2,726,448	\$ 546,220	\$ 7,023,268	\$ 498,556	\$ 834,274	\$ 356,864	\$ 314,217	\$ 777,606	\$ 45,159,247
Actual Retail Rider Revenues	\$ 3,948,435	\$ 3,440,635	\$ 3,690,597	\$ 3,240,191	\$ 3,580,519	\$ 3,958,530	\$ 4,558,300	\$ 4,419,217	\$ 3,804,092	\$ 3,619,985	\$ 3,470,614	\$ 3,821,820	\$ 45,552,934
Grant Project Revenue	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Balance	\$ 19,638,188	\$ 3,543,076	\$ (3,260,380)	\$ (1,765,260)	\$ (854,071)	\$ (3,412,310)	\$ 2,464,967	\$ (3,920,660)	\$ (2,969,818)	\$ (3,263,121)	\$ (3,156,396)	\$ (3,044,215)	\$ -

2018 RDF Rider True-Up	\$ -
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RENEWABLE DEVELOPMENT FUND

2018 Rider Calculation - Option 2

State of Minnesota Recovery

2018 RDF Expenses

	Forecast Jan 2018	Forecast Feb 2018	Forecast Mar 2018	Forecast Apr 2018	Forecast May 2018	Forecast Jun 2018	Forecast Jul 2018	Forecast Aug 2018	Forecast Sep 2018	Forecast Oct 2018	Forecast Nov 2018	Forecast Dec 2018	Total
Category A Projects - EP	\$ 969,741	\$ 1,850,000	\$ -	\$ -	\$ 1,650,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 4,460,741
Category B Projects - R&D and HE	\$ 81,742	\$ 656,606	\$ 27,260	\$ 178,155	\$ 1,077,260	\$ 255,629	\$ -	\$ 136,206	\$ 640,657	\$ 119,860	\$ 89,272	\$ 541,303	\$ 3,803,950
Other Legis Mandates	\$ 16,143,918	\$ 4,735,720	\$ 350,385	\$ 1,244,206	\$ 222,844	\$ 238,015	\$ 6,966,981	\$ 298,844	\$ 139,191	\$ 183,512	\$ 172,374	\$ 184,191	\$ 30,880,181
REPI	\$ 51,652	\$ 51,652	\$ 51,652	\$ 51,652	\$ 51,652	\$ 51,652	\$ 51,652	\$ 51,652	\$ 51,652	\$ 51,652	\$ 51,652	\$ 51,652	\$ 619,819
Total Project Costs	\$ 17,247,053	\$ 7,293,978	\$ 429,297	\$ 1,474,013	\$ 3,001,756	\$ 545,296	\$ 7,018,633	\$ 486,702	\$ 831,500	\$ 355,024	\$ 313,298	\$ 777,146	\$ 39,773,691
Total Admin Costs	\$ 1,000	\$ 1,000	\$ 1,000	\$ 1,000	\$ 1,000	\$ 1,000	\$ 5,000	\$ 12,800	\$ 3,000	\$ 2,000	\$ 1,000	\$ 500	\$ 30,300
Total RDF Expense	\$ 17,248,053	\$ 7,294,978	\$ 430,297	\$ 1,475,013	\$ 3,002,756	\$ 546,296	\$ 7,023,633	\$ 499,502	\$ 834,500	\$ 357,024	\$ 314,298	\$ 777,646	\$ 39,803,991
MN State Sales Allocator	83.2752%	83.1791%	83.1328%	82.7031%	83.2589%	84.0328%	84.5876%	84.4047%	84.1200%	83.1789%	83.0443%	83.1268%	
MN Administrative Cost Allocator	92.0787%	92.0332%	92.0113%	91.8078%	92.0710%	92.4375%	92.7003%	92.6137%	92.4788%	92.0331%	91.9694%	92.0084%	

2018 RDF Rider Recovery

Category A Projects - EP	\$ 807,554	\$ 1,538,813	\$ -	\$ -	\$ 1,373,772	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 3,720,139
Category B Projects - R&D and HE	\$ 81,742	\$ 656,606	\$ 27,260	\$ 178,155	\$ 1,077,260	\$ 255,629	\$ -	\$ 136,206	\$ 640,657	\$ 119,860	\$ 89,272	\$ 541,303	\$ 3,803,950
Other Legis Mandates	\$ 16,143,918	\$ 4,735,720	\$ 350,385	\$ 1,244,206	\$ 222,844	\$ 238,015	\$ 6,966,981	\$ 298,844	\$ 139,191	\$ 183,512	\$ 172,374	\$ 184,191	\$ 30,880,181
REPI	\$ 51,652	\$ 51,652	\$ 51,652	\$ 51,652	\$ 51,652	\$ 51,652	\$ 51,652	\$ 51,652	\$ 51,652	\$ 51,652	\$ 51,652	\$ 51,652	\$ 619,819
Administrative Costs	\$ 921	\$ 920	\$ 918	\$ 918	\$ 921	\$ 924	\$ 4,635	\$ 11,855	\$ 2,774	\$ 1,841	\$ 920	\$ 460	\$ 28,009
Expense Recovery	\$ 17,085,786	\$ 6,983,711	\$ 430,217	\$ 1,474,931	\$ 2,726,448	\$ 546,220	\$ 7,023,268	\$ 498,556	\$ 834,274	\$ 356,864	\$ 314,217	\$ 777,606	\$ 39,052,098

Total 2018 RDF Expense Recovery	\$ 39,052,098
2017 True-up Amount to be Included in the Calculation of the 2018 RDF Rider	\$ 393,687
Total Amount to be Recovered Through the 2018 Rider	\$ 39,445,785

2018 RDF Rider Calculation

	Forecast Jan 2018	Forecast Feb 2018	Forecast Mar 2018	Forecast Apr 2018	Forecast May 2018	Forecast Jun 2018	Forecast Jul 2018	Forecast Aug 2018	Forecast Sep 2018	Forecast Oct 2018	Forecast Nov 2018	Forecast Dec 2018	Total
2018 MN Calendar Month kWh Sales	2,594,773,782	2,261,065,592	2,425,331,705	2,129,340,505	2,352,992,692	2,601,408,301	2,995,556,264	2,904,155,357	2,499,917,187	2,378,928,194	2,280,766,491	2,511,567,263	29,935,803,334
2018 Minnesota RDF Rider Factor													\$ 0.001318

2018 RDF Tracker Calculation

	Forecast Jan 2018	Forecast Feb 2018	Forecast Mar 2018	Forecast Apr 2018	Forecast May 2018	Forecast Jun 2018	Forecast Jul 2018	Forecast Aug 2018	Forecast Sep 2018	Forecast Oct 2018	Forecast Nov 2018	Forecast Dec 2018	Total
Previous Year True-Up	\$ 393,687												\$ 393,687
Actual Expenses	\$ 17,085,786	\$ 6,983,711	\$ 430,217	\$ 1,474,931	\$ 2,726,448	\$ 546,220	\$ 7,023,268	\$ 498,556	\$ 834,274	\$ 356,864	\$ 314,217	\$ 777,606	\$ 39,052,098
Actual Retail Rider Revenues	\$ 3,419,079	\$ 2,979,359	\$ 3,195,809	\$ 2,805,788	\$ 3,100,490	\$ 3,427,822	\$ 3,947,182	\$ 3,826,745	\$ 3,294,089	\$ 3,134,664	\$ 3,005,319	\$ 3,309,440	\$ 39,445,785
Grant Project Revenue	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Balance	\$ 14,060,394	\$ 4,004,352	\$ (2,765,592)	\$ (1,330,857)	\$ (374,041)	\$ (2,881,602)	\$ 3,076,085	\$ (3,328,189)	\$ (2,459,815)	\$ (2,777,800)	\$ (2,691,101)	\$ (2,531,834)	\$ -

2018 RDF Rider True-Up \$ -

RENEWABLE DEVELOPMENT FUND
2018 Rider Calculation - Option 3
 State of Minnesota Recovery

2018 RDF Expenses

	Forecast Jan 2018	Forecast Feb 2018	Forecast Mar 2018	Forecast Apr 2018	Forecast May 2018	Forecast Jun 2018	Forecast Jul 2018	Forecast Aug 2018	Forecast Sep 2018	Forecast Oct 2018	Forecast Nov 2018	Forecast Dec 2018	Total
Category A Projects - EP	\$ 969,741	\$ 1,850,000	\$ -	\$ -	\$ 1,650,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 4,469,741
Category B Projects - R&D and HE	\$ 81,742	\$ 656,606	\$ 27,260	\$ 178,155	\$ 1,077,260	\$ 255,629	\$ -	\$ 136,206	\$ 640,657	\$ 119,860	\$ 89,272	\$ 541,303	\$ 3,803,950
Other Legis Mandates	\$ 37,874,446	\$ 4,735,720	\$ 350,385	\$ 1,244,206	\$ 222,844	\$ 238,015	\$ 6,966,981	\$ 298,844	\$ 139,191	\$ 183,512	\$ 172,374	\$ 184,191	\$ 52,610,709
REPI	\$ 51,652	\$ 51,652	\$ 51,652	\$ 51,652	\$ 51,652	\$ 51,652	\$ 51,652	\$ 51,652	\$ 51,652	\$ 51,652	\$ 51,652	\$ 51,652	\$ 619,819
Total Project Costs	\$ 38,977,581	\$ 7,293,978	\$ 429,297	\$ 1,474,013	\$ 3,001,756	\$ 545,296	\$ 7,018,633	\$ 486,702	\$ 831,500	\$ 355,024	\$ 313,298	\$ 777,146	\$ 61,504,219
Total Admin Costs	\$ 1,000	\$ 1,000	\$ 1,000	\$ 1,000	\$ 1,000	\$ 1,000	\$ 5,000	\$ 12,800	\$ 3,000	\$ 2,000	\$ 1,000	\$ 500	\$ 30,300
Total RDF Expense	\$ 38,978,581	\$ 7,294,978	\$ 430,297	\$ 1,475,013	\$ 3,002,756	\$ 546,296	\$ 7,023,633	\$ 499,502	\$ 834,500	\$ 357,024	\$ 314,298	\$ 777,646	\$ 61,534,519

MN State Sales Allocator	83.2752%	83.1791%	83.1328%	82.7031%	83.2589%	84.0328%	84.5876%	84.4047%	84.1200%	83.1789%	83.0443%	83.1268%	
MN Administrative Cost Allocator	92.0787%	92.0332%	92.0113%	91.8078%	92.0710%	92.4375%	92.7003%	92.6137%	92.4788%	92.0331%	91.9694%	92.0084%	

2018 RDF Rider Recovery

	Forecast Jan 2018	Forecast Feb 2018	Forecast Mar 2018	Forecast Apr 2018	Forecast May 2018	Forecast Jun 2018	Forecast Jul 2018	Forecast Aug 2018	Forecast Sep 2018	Forecast Oct 2018	Forecast Nov 2018	Forecast Dec 2018	Total
Category A Projects - EP	\$ 807,554	\$ 1,538,813	\$ -	\$ -	\$ 1,373,772	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 3,720,139
Category B Projects - R&D and HE	\$ 81,742	\$ 656,606	\$ 27,260	\$ 178,155	\$ 1,077,260	\$ 255,629	\$ -	\$ 136,206	\$ 640,657	\$ 119,860	\$ 89,272	\$ 541,303	\$ 3,803,950
Other Legis Mandates	\$ 37,874,446	\$ 4,735,720	\$ 350,385	\$ 1,244,206	\$ 222,844	\$ 238,015	\$ 6,966,981	\$ 298,844	\$ 139,191	\$ 183,512	\$ 172,374	\$ 184,191	\$ 52,610,709
REPI	\$ 51,652	\$ 51,652	\$ 51,652	\$ 51,652	\$ 51,652	\$ 51,652	\$ 51,652	\$ 51,652	\$ 51,652	\$ 51,652	\$ 51,652	\$ 51,652	\$ 619,819
Administrative Costs	\$ 921	\$ 920	\$ 920	\$ 918	\$ 921	\$ 924	\$ 4,635	\$ 11,855	\$ 2,774	\$ 1,841	\$ 920	\$ 460	\$ 28,009
Expense Recovery	\$ 38,816,314	\$ 6,983,711	\$ 430,217	\$ 1,474,931	\$ 2,726,448	\$ 546,220	\$ 7,023,268	\$ 498,556	\$ 834,274	\$ 356,864	\$ 314,217	\$ 777,606	\$ 60,782,626

Total 2018 RDF Expense Recovery	\$ 60,782,626
2017 True-up Amount to be Included in the Calculation of the 2018 RDF Rider	\$ 393,687
Total Amount to be Recovered Through the 2018 Rider	\$ 61,176,313

2018 RDF Rider Calculation

	Forecast Jan 2018	Forecast Feb 2018	Forecast Mar 2018	Forecast Apr 2018	Forecast May 2018	Forecast Jun 2018	Forecast Jul 2018	Forecast Aug 2018	Forecast Sep 2018	Forecast Oct 2018	Forecast Nov 2018	Forecast Dec 2018	Total
2018 MN Calendar Month kWh Sales	2,594,773,782	2,261,065,592	2,425,331,705	2,129,340,505	2,352,992,692	2,601,408,301	2,995,556,264	2,904,155,357	2,499,917,187	2,378,928,194	2,280,766,491	2,511,567,263	29,935,803,334
2018 Minnesota RDF Rider Factor													\$ 0.002044

2018 RDF Tracker Calculation

	Forecast Jan 2018	Forecast Feb 2018	Forecast Mar 2018	Forecast Apr 2018	Forecast May 2018	Forecast Jun 2018	Forecast Jul 2018	Forecast Aug 2018	Forecast Sep 2018	Forecast Oct 2018	Forecast Nov 2018	Forecast Dec 2018	Total
Previous Year True-Up	\$ 393,687												\$ 393,687
Actual Expenses	\$ 38,816,314	\$ 6,983,711	\$ 430,217	\$ 1,474,931	\$ 2,726,448	\$ 546,220	\$ 7,023,268	\$ 498,556	\$ 834,274	\$ 356,864	\$ 314,217	\$ 777,606	\$ 60,782,626
Actual Retail Rider Revenues	\$ 5,302,637	\$ 4,620,676	\$ 4,956,368	\$ 4,351,485	\$ 4,808,537	\$ 5,316,195	\$ 6,121,669	\$ 5,934,884	\$ 5,108,789	\$ 4,861,538	\$ 4,660,937	\$ 5,132,597	\$ 61,176,313
Grant Project Revenue	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Balance	\$ 33,907,365	\$ 2,363,035	\$ (4,526,151)	\$ (2,876,554)	\$ (2,082,089)	\$ (4,769,975)	\$ 901,598	\$ (5,436,328)	\$ (4,274,516)	\$ (4,504,674)	\$ (4,346,719)	\$ (4,354,929)	\$ -

2018 RDF Rider True-Up	\$ -
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RENEWABLE DEVELOPMENT FUND
2018 Rider Calculation - Option 4
 State of Minnesota Recovery

2018 RDF Expenses

	Forecast Jan 2018	Forecast Feb 2018	Forecast Mar 2018	Forecast Apr 2018	Forecast May 2018	Forecast Jun 2018	Forecast Jul 2018	Forecast Aug 2018	Forecast Sep 2018	Forecast Oct 2018	Forecast Nov 2018	Forecast Dec 2018	Total
Category A Projects - EP	\$ 969,741	\$ 1,850,000	\$ -	\$ -	\$ 1,650,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 4,469,741
Category B Projects - R&D and HE	\$ 81,742	\$ 656,606	\$ 27,260	\$ 178,155	\$ 1,077,260	\$ 255,629	\$ -	\$ 136,206	\$ 640,657	\$ 119,860	\$ 89,272	\$ 541,303	\$ 3,803,950
Other Legis Mandates	\$ 41,435,855	\$ 4,735,720	\$ 350,385	\$ 1,244,206	\$ 222,844	\$ 238,015	\$ 6,966,981	\$ 298,844	\$ 139,191	\$ 183,512	\$ 172,374	\$ 184,191	\$ 56,172,118
REPI	\$ 51,652	\$ 51,652	\$ 51,652	\$ 51,652	\$ 51,652	\$ 51,652	\$ 51,652	\$ 51,652	\$ 51,652	\$ 51,652	\$ 51,652	\$ 51,652	\$ 619,819
Total Project Costs	\$ 42,538,990	\$ 7,293,978	\$ 429,297	\$ 1,474,013	\$ 3,001,756	\$ 545,296	\$ 7,018,633	\$ 486,702	\$ 831,500	\$ 355,024	\$ 313,298	\$ 777,146	\$ 65,065,628
Total Admin Costs	\$ 1,000	\$ 1,000	\$ 1,000	\$ 1,000	\$ 1,000	\$ 1,000	\$ 5,000	\$ 12,800	\$ 3,000	\$ 2,000	\$ 1,000	\$ 500	\$ 30,300
Total RDF Expense	\$ 42,539,990	\$ 7,294,978	\$ 430,297	\$ 1,475,013	\$ 3,002,756	\$ 546,296	\$ 7,023,633	\$ 499,502	\$ 834,500	\$ 357,024	\$ 314,298	\$ 777,646	\$ 65,095,928

MN State Sales Allocator	83.2752%	83.1791%	83.1328%	82.7031%	83.2589%	84.0328%	84.5876%	84.4047%	84.1200%	83.1789%	83.0443%	83.1268%	
MN Administrative Cost Allocator	92.0787%	92.0332%	92.0113%	91.8078%	92.0710%	92.4375%	92.7003%	92.6137%	92.4788%	92.0331%	91.9694%	92.0084%	

2018 RDF Rider Recovery

Category A Projects - EP	\$ 807,554	\$ 1,538,813	\$ -	\$ -	\$ 1,373,772	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 3,720,139
Category B Projects - R&D and HE	\$ 81,742	\$ 656,606	\$ 27,260	\$ 178,155	\$ 1,077,260	\$ 255,629	\$ -	\$ 136,206	\$ 640,657	\$ 119,860	\$ 89,272	\$ 541,303	\$ 3,803,950
Other Legis Mandates	\$ 41,435,855	\$ 4,735,720	\$ 350,385	\$ 1,244,206	\$ 222,844	\$ 238,015	\$ 6,966,981	\$ 298,844	\$ 139,191	\$ 183,512	\$ 172,374	\$ 184,191	\$ 56,172,118
REPI	\$ 51,652	\$ 51,652	\$ 51,652	\$ 51,652	\$ 51,652	\$ 51,652	\$ 51,652	\$ 51,652	\$ 51,652	\$ 51,652	\$ 51,652	\$ 51,652	\$ 619,819
Administrative Costs	\$ 921	\$ 920	\$ 920	\$ 918	\$ 921	\$ 924	\$ 4,635	\$ 11,855	\$ 2,774	\$ 1,841	\$ 920	\$ 460	\$ 28,009
Expense Recovery	\$ 42,377,723	\$ 6,983,711	\$ 430,217	\$ 1,474,931	\$ 2,726,448	\$ 546,220	\$ 7,023,268	\$ 498,556	\$ 834,274	\$ 356,864	\$ 314,217	\$ 777,606	\$ 64,344,035

Total 2018 RDF Expense Recovery	\$ 64,344,035
2017 True-up Amount to be Included in the Calculation of the 2018 RDF Rider	\$ 393,687
Total Amount to be Recovered Through the 2018 Rider	\$ 64,737,722

2018 RDF Rider Calculation

	Forecast Jan 2018	Forecast Feb 2018	Forecast Mar 2018	Forecast Apr 2018	Forecast May 2018	Forecast Jun 2018	Forecast Jul 2018	Forecast Aug 2018	Forecast Sep 2018	Forecast Oct 2018	Forecast Nov 2018	Forecast Dec 2018	Total
2018 MN Calendar Month kWh Sales	2,594,773,782	2,261,065,592	2,425,331,705	2,129,340,505	2,352,992,692	2,601,408,301	2,995,556,264	2,904,155,357	2,499,917,187	2,378,928,194	2,280,766,491	2,511,567,263	29,935,803,334
2018 Minnesota RDF Rider Factor													\$ 0.002163

2018 RDF Tracker Calculation

	Forecast Jan 2018	Forecast Feb 2018	Forecast Mar 2018	Forecast Apr 2018	Forecast May 2018	Forecast Jun 2018	Forecast Jul 2018	Forecast Aug 2018	Forecast Sep 2018	Forecast Oct 2018	Forecast Nov 2018	Forecast Dec 2018	Total
Previous Year True-Up	\$ 393,687												\$ 393,687
Actual Expenses	\$ 42,377,723	\$ 6,983,711	\$ 430,217	\$ 1,474,931	\$ 2,726,448	\$ 546,220	\$ 7,023,268	\$ 498,556	\$ 834,274	\$ 356,864	\$ 314,217	\$ 777,606	\$ 64,344,035
Actual Retail Rider Revenues	\$ 5,611,332	\$ 4,889,671	\$ 5,244,905	\$ 4,604,809	\$ 5,088,468	\$ 5,625,680	\$ 6,478,045	\$ 6,280,386	\$ 5,406,200	\$ 5,144,555	\$ 4,932,275	\$ 5,431,394	\$ 64,737,722
Grant Project Revenue	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Balance	\$ 37,160,078	\$ 2,094,040	\$ (4,814,688)	\$ (3,129,878)	\$ (2,362,020)	\$ (5,079,460)	\$ 545,222	\$ (5,781,830)	\$ (4,571,926)	\$ (4,787,691)	\$ (4,618,058)	\$ (4,653,788)	\$ -

2018 RDF Rider True-Up	\$ -
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CERTIFICATE OF SERVICE

I, Carl Cronin, 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/M-17-712

XCEL ENERGY'S MISCELLANEOUS ELECTRIC SERVICE LIST

Dated this 15th day of December 2017

/s/

Carl Cronin

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
David	Aafedt	daafedt@winthrop.com	Winthrop & Weinstine, P.A.	Suite 3500, 225 South Sixth Street Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_17-712_M-17-712
Christopher	Anderson	canderson@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022191	Electronic Service	No	OFF_SL_17-712_M-17-712
Alison C	Archer	aarcher@misoenergy.org	MISO	2985 Ames Crossing Rd Eagan, MN 55121	Electronic Service	No	OFF_SL_17-712_M-17-712
Mara	Ascheman	mara.k.ascheman@xcelenenergy.com	Xcel Energy	414 Nicollet Mall Fl 5 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_17-712_M-17-712
Lisa	Barajas	lisa.barajas@metc.state.mn.us	Metropolitan Council	390 Robert St N Saint Paul, MN 55101	Electronic Service	No	OFF_SL_17-712_M-17-712
Ryan	Barlow	Ryan.Barlow@ag.state.mn.us	Office of the Attorney General-RUD	445 Minnesota Street Bremer Tower, Suite 1400 St. Paul, Minnesota 55101	Electronic Service	No	OFF_SL_17-712_M-17-712
James J.	Bertrand	james.bertrand@stinson.com	Stinson Leonard Street LLP	50 S 6th St Ste 2600 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_17-712_M-17-712
William A.	Blazar	bblazar@mnchamber.com	Minnesota Chamber Of Commerce	Suite 1500 400 Robert Street North St. Paul, MN 55101	Electronic Service	No	OFF_SL_17-712_M-17-712
Edna C	Brazaitis	ednab@mac.com	Friends of the Riverfront	PO Box 580545 Minneapolis, Minnesota 55458-0545	Electronic Service	No	OFF_SL_17-712_M-17-712
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	No	OFF_SL_17-712_M-17-712

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Jeanne	Cochran	Jeanne.Cochran@state.mn.us	Office of Administrative Hearings	P.O. Box 64620 St. Paul, MN 55164-0620	Electronic Service	No	OFF_SL_17-712_M-17-712
John	Coffman	john@johncoffman.net	AARP	871 Tuxedo Blvd. St. Louis, MO 63119-2044	Electronic Service	No	OFF_SL_17-712_M-17-712
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1800 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_17-712_M-17-712
Corey	Conover	corey.conover@minneapolismn.gov	Minneapolis City Attorney	350 S. Fifth Street City Hall, Room 210 Minneapolis, MN 554022453	Electronic Service	No	OFF_SL_17-712_M-17-712
Carl	Cronin	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_17-712_M-17-712
Joseph	Dammel	joseph.dammel@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_17-712_M-17-712
Tom	Dimond	N/A	-	2119 Skyway Dr Saint Paul, MN 55119	Paper Service	No	OFF_SL_17-712_M-17-712
Ian	Dobson	Residential.Utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012130	Electronic Service	Yes	OFF_SL_17-712_M-17-712
D. Stephen	Elliott	steve.elliott@mnhs.org	MN Historical Society	Minnesota Historical Society 345 Kellogg Blvd W Saint Paul, MN 55102-1906	Electronic Service	No	OFF_SL_17-712_M-17-712

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Tom	Evers	janette@mplsparksfoundation.org	Minneapolis Parks Foundation	4800 Minnehaha Ave Minneapolis, MN Minnesota 55417	Electronic Service	No	OFF_SL_17-712_M-17-712
John	Farrell	jfarrell@ilsr.org	Institute for Local Self-Reliance	1313 5th St SE #303 Minneapolis, MN 55414	Electronic Service	No	OFF_SL_17-712_M-17-712
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_17-712_M-17-712
Jaco	Frey	jacob.frey@minneapolismn.gov	Minneapolis City of Lakes	350 S 5th St Rm 307 Minneapolis, MN 55415-1383	Electronic Service	No	OFF_SL_17-712_M-17-712
Arlene	Fried	minneapolisparkwatch@gmail.com	Park Watch	1109 Xerxes Ave S Minneapolis, MN 55405	Electronic Service	No	OFF_SL_17-712_M-17-712
Edward	Garvey	edward.garvey@AESLconsulting.com	AESL Consulting	32 Lawton St Saint Paul, MN 55102-2617	Electronic Service	No	OFF_SL_17-712_M-17-712
Christine R	Goepfert	cgoepfert@npca.org	National Parks Conservation Association	546 Rice St Ste 100 Saint Paul, MN 55103	Electronic Service	No	OFF_SL_17-712_M-17-712
Janet	Gonzalez	Janet.gonzalez@state.mn.us	Public Utilities Commission	Suite 350 121 7th Place East St. Paul, MN 55101	Electronic Service	No	OFF_SL_17-712_M-17-712
Kimberly	Hellwig	kimberly.hellwig@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_17-712_M-17-712
Diane	Hofstede	greatrivercoalition@gmail.com		3359 Central Ave NE Minneapolis, MN 55418	Electronic Service	No	OFF_SL_17-712_M-17-712

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Lisa	Hondros	lhondros@gmail.com	Friends of the Lock and Dam	171 East Island Ave Minneapolis, MN 55401	Electronic Service	No	OFF_SL_17-712_M-17-712
Michael	Hoppe	il23@mtn.org	Local Union 23, I.B.E.W.	932 Payne Avenue St. Paul, MN 55130	Electronic Service	No	OFF_SL_17-712_M-17-712
Julia	Jazyuka	jjazyuka@energyfreedomcoalition.com	Energy Freedom Coalition of America	101 Constitution Ave NW Ste 525 East Washington, DC 20001	Electronic Service	No	OFF_SL_17-712_M-17-712
Alan	Jenkins	aj@jenkinsatlaw.com	Jenkins at Law	2265 Roswell Road Suite 100 Marietta, GA 30062	Electronic Service	No	OFF_SL_17-712_M-17-712
Linda	Jensen	linda.s.jensen@ag.state.mn.us	Office of the Attorney General-DOC	1800 BRM Tower 445 Minnesota Street St. Paul, MN 551012134	Electronic Service	No	OFF_SL_17-712_M-17-712
Richard	Johnson	Rick.Johnson@lawmoss.com	Moss & Barnett	150 S. 5th Street Suite 1200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_17-712_M-17-712
Thomas L	Johnson	thomas.Johnson@gpmlaw.com	Gray, Plant, Mooty, Mooty & Bennett	500 IDS Center 80 S 8th St Minneapolis, MN 55402-3796	Electronic Service	No	OFF_SL_17-712_M-17-712
Sarah	Johnson Phillips	sarah.phillips@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_17-712_M-17-712
Phyllis	Kahn	N/A	A Citizen	115 Island Ave W Minneapolis, MN 55401	Paper Service	No	OFF_SL_17-712_M-17-712

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Mark J.	Kaufman	mkaufman@ibewlocal949.org	IBEW Local Union 949	12908 Nicollet Avenue South Burnsville, MN 55337	Electronic Service	No	OFF_SL_17-712_M-17-712
Thomas	Koehler	TGK@IBEW160.org	Local Union #160, IBEW	2909 Anthony Ln St Anthony Village, MN 55418-3238	Electronic Service	No	OFF_SL_17-712_M-17-712
Michael	Krikava	mkrikava@briggs.com	Briggs And Morgan, P.A.	2200 IDS Center 80 S 8th St Minneapolis, MN 55402	Electronic Service	No	OFF_SL_17-712_M-17-712
Douglas	Larson	dlarson@dakotaelectric.com	Dakota Electric Association	4300 220th St W Farmington, MN 55024	Electronic Service	No	OFF_SL_17-712_M-17-712
Peder	Larson	plarson@larkinhoffman.com	Larkin Hoffman Daly & Lindgren, Ltd.	8300 Norman Center Drive Suite 1000 Bloomington, MN 55437	Electronic Service	No	OFF_SL_17-712_M-17-712
Paula	Maccabee	Pmaccabee@justchangela w.com	Just Change Law Offices	1961 Selby Ave Saint Paul, MN 55104	Electronic Service	No	OFF_SL_17-712_M-17-712
Peter	Madsen	peter.madsen@ag.state.mn.us	Office of the Attorney General-DOC	Bremer Tower, Suite 1800 445 Minnesota Street St. Paul, Minnesota 55101	Electronic Service	No	OFF_SL_17-712_M-17-712
Kavita	Maini	kmains@wi.rr.com	KM Energy Consulting LLC	961 N Lost Woods Rd Oconomowoc, WI 53066	Electronic Service	No	OFF_SL_17-712_M-17-712
Pam	Marshall	pam@energycents.org	Energy CENTS Coalition	823 7th St E St. Paul, MN 55106	Electronic Service	No	OFF_SL_17-712_M-17-712

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Peter	McLaughlin	N/A	Hennepin County	A-2400 Government Center 300 S 6th St Minneapolis, MN 55487	Paper Service	No	OFF_SL_17-712_M-17-712
Gregory R.	Merz	gregory.merz@gpmlaw.com	Gray, Plant, Mooty	80 S 8th St Ste 500 Minneapolis, MN 55402-5383	Electronic Service	No	OFF_SL_17-712_M-17-712
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_17-712_M-17-712
David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022093	Electronic Service	No	OFF_SL_17-712_M-17-712
Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP	33 South Sixth St Ste 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_17-712_M-17-712
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