



414 Nicollet Mall
Minneapolis, MN 55401

—Via Electronic Filing—

March 17, 2025

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

RE: PETITION
IN THE MATTER OF A PEAK TIME REBATE PROGRAM FOR NORTHERN STATES
POWER CO. D/B/A XCEL ENERGY TO FURTHER THE COMMISSION'S
ADVANCED RATE DESIGN EFFORTS IN DOCKET NO. E002/CI-24-115
DOCKET NO. E002/M-24-432

Dear Mr. Seuffert:

Northern States Power Company, doing business as Xcel Energy (Company), submits to the Minnesota Public Utilities Commission (Commission) this Petition for approval to propose replacing the Company's Energy Action Days program with a Peak Time Rebate (PTR) program as part of our 2024-2026 Energy Conservation and Optimization (ECO) Triennial in Docket No. E,G002/CIP-23-92. Upon approval of this regulatory pathway by the Commission, the Company would submit a program modification to the Department of Commerce (Department) as part of Minnesota Rules 7690.1400 for inclusion in our 2026 ECO Portfolio.

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 Kris Kohls at 612-216-8124 or Kris.Kohls@xcelenergy.com, or contact me at 612-216-7972 or Jessica.K.Peterson@xcelenergy.com if you have any questions regarding this filing.

Sincerely,

/s/

JESSICA PETERSON
MANAGER, PROGRAM POLICY
Enclosures
c: Service List

REQUIRED INFORMATION

I. SUMMARY OF FILING

A one-paragraph summary is attached to this filing pursuant to Minn. R. 7829.1300, subp. 1.

II. SERVICE ON OTHER PARTIES

Pursuant to Minn. Stat. § 216.17, subd. 3, we have electronically filed this document with the Commission. Pursuant to Minn. R. 7829.1300, subp. 2, the Company has served a copy of this filing on the Department of Commerce and the Office of the Attorney General. A summary of the filing has been served on all parties on the enclosed service list.

III. GENERAL FILING INFORMATION

Pursuant to Minn. R. 7829.1300, subp. 3, the Company provides the following information.

A. Name, Address, and Telephone Number of Utility

Northern States Power Company doing business as:
Xcel Energy
414 Nicollet Mall
Minneapolis, MN 55401
(612) 330-5500

B. Name, Address, and Telephone Number of Utility Attorney

Lauren Steinhäuser
Assistant General Counsel
Xcel Energy
414 Nicollet Mall, 401 – 8th Floor
Minneapolis, MN 55401
612-216-8274

C. Date of Filing

The date of this filing is March 17, 2025.

REQUIRED INFORMATION

D. Utility Employee Responsible for Filing

Jessica Peterson
Manager, Program Policy
Xcel Energy
414 Nicollet Mall, 401 – 6th Floor
Minneapolis, MN 55401
612-216-7972

IV. MISCELLANEOUS INFORMATION

Pursuant to Minn. R. 7829.0700, the Company requests that the following persons be placed on the Commission's official service list for this proceeding:

Lauren Steinhäuser
Assistant General Counsel
Xcel Energy
414 Nicollet Mall, 401 – 8th Floor
Minneapolis, MN 55401
Lauren.Steinhäuser@xcelenergy.com

Christine Schwartz
Regulatory Administrator
Xcel Energy
414 Nicollet Mall, 401 – 7th Floor
Minneapolis, MN 55401
regulatory.records@xcelenergy.com

Any information requests in this proceeding should be submitted to Ms. Schwartz at the Regulatory Records email address above.

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 PEAK TIME
REBATE PROGRAM FOR NORTHERN
STATES POWER CO. D/B/A XCEL
ENERGY TO FURTHER THE
COMMISSION'S ADVANCED RATE
DESIGN EFFORTS IN DOCKET NO.
E002/CI-24-115

DOCKET NO. E002/M-24-432

PETITION

INTRODUCTION

Northern States Power Company, doing business as Xcel Energy (Company), submits to the Minnesota Public Utilities Commission (Commission) this Petition for approval to propose replacing the Company's Energy Action Days program with a Peak Time Rebate (PTR) program as part of our 2024-2026 Energy Conservation and Improvement (ECO) Triennial in Docket No. G,E002/CIP-23-92. Upon approval of this regulatory pathway by the Commission, the Company would submit a program modification to the Department of Commerce (Department) as part of Minnesota Rules 7690.1400 for inclusion in our 2026 ECO Portfolio.

This Petition is filed in compliance with two Commission Orders. First, in compliance with the December 4, 2024, Order Approving the Minnesota Transmission Cost Recovery Rider Docket No. E002/M-23-467 (TCR Order), Order Point 5 which requires the Company to "... propose procedural pathways for additional DR and load flex programs by the rate case completeness hearing date." Second, the December 30, 2024, Notice of and Order for Hearing of the MN Electric Rate Case Docket No. E002/GR-24-320 (Rate Case Order), Order Point 4, delegated the Executive Secretary to "open a docket to evaluate a proposal for a peak-time rebate (PTR) program for Xcel Energy, which Xcel shall file by March 17, 2025. The docket shall also evaluate avenues for cost

recovery of the PTR program, including possible incorporation into the current rate case proceeding before a final Order is issued.”

In compliance with both above-referenced order points, the Company respectfully requests the Commission approve the Company’s proposal to work with the Department in the context of the Company’s ECO Triennial to implement and recover costs for the PTR program. Although the Company is not presently asking the Commission to approve the program itself, for clarity and context, we provide details of the PTR program we will propose to the Department herein.

The balance of this filing covers the following topics:

- Procedural Pathway
- Behavioral Demand Response
- Research
- Program Design and Implementation

The Company includes the following Attachments in support of its Petition:

Attachment A: Demand Response Programs

Attachment B: PTR Utility Benchmarking Matrix

Attachment C: Stakeholder Engagement Presentations and Notes

Attachment D: The Cost Benefit Analysis

I. PROCEDURAL PATHWAY

In compliance with the TCR Order, the Company considered implementation of a PTR program through a stand-alone petition to the Commission and through the Company’s ECO Triennial. The Company recommends ECO as the appropriate procedural pathway for implementing a PTR program for a number of reasons: (1) the ECO Act modified CIP to include this type of program; (2) this procedural pathway is consistent with the pathway used for the Company’s current portfolio of demand response (DR) programs including Energy Action Days, our current behavioral demand response offering; and (3) cost recovery has already been established for ECO programs creating a clear pathway for cost recovery.

A. Minnesota Statute Allows for the Inclusion of Behavior Demand Response Programs like PTR in ECO

The landmark ECO Act is the most important energy-efficiency legislation in Minnesota since 2007's Next Generation Act; it modernized the framework for customer-funded utility programs and re-imagined the scope of what such programs could include. Specifically, Minnesota Statute § 216B.2401, as modified by the ECO Act, updated the definition of load management to mean:

“...an activity, service, or technology that changes the timing or the efficiency of a customer's use of energy that allows a utility or a customer to: (1) respond to local and regional energy system conditions; or (2) reduce peak demand for electricity or natural gas. Load management that reduces a customer's net annual energy consumption is also energy conservation.”

These changes allow additional load management (like DR) programs to go beyond traditional peak-hour load shedding to optimize the time at which customers use energy, which is exactly what the PTR program is designed to do. The PTR program will provide a rebate to customers based on a reduction of peak-hour energy as enabled by ECO.

PTR is a customer incentive to reduce the timing of the customer's energy use in response to energy system conditions to reduce peak load. With savings estimated at 0.63 kW and 2.5 kWh per customer, the program also meets the cost-effectiveness requirements for an energy efficiency program under Minnesota Statute § 216B.241. Indeed, the Company will demonstrate that the PTR program meets all the requirements of an ECO program.

B. Program Consistency

Implementing PTR in ECO is consistent with the pathway used for the Company's current portfolio of DR programs. Our most recent ECO Triennial Plan includes several programs in our DR Portfolio, including Commercial AC Control, Critical Peak Pricing, Electric Rate Savings, Peak Partner Rewards, and Residential Demand Response (including Saver's Switch, AC Rewards and Energy Action Days). The Company also has two pilots approved in 2024 for Peak Day Partners and Battery Connect. Attachment A includes all our current demand response programs and their regulatory path. The Department found these programs to meet the requirements for inclusion in ECO.¹

¹ [Approved by the Department on December 1, 2023, in Docket No. G,E002/CIP-23-92.](#)

Demand response programs in the ECO portfolio typically include a customer agreement to control load in a certain way for the opportunity to earn an incentive.² The PTR program is similarly structured. The Company's PTR program will utilize a similar customer agreement as approved in other DR programs, as well as similar behavioral messaging, controls and detailed analysis as our current Energy Action Days program. Since ECO went into effect, no demand response programs have been made part of the Company's Electric Rate Book—all such programs have been implemented through ECO.³

For the PTR program, the Company plans to submit a modification to the Department for evaluation of the program as part of Company's active 2024-2026 ECO Triennial Plan alongside the other Residential Demand Response programs. This will entail a modification of the existing Energy Action Days program, and we believe authorization under ECO is consistent with the rationale to do so in other similar proceedings, such as the Minnesota Transmission Cost Recovery Rider Docket No. E002/M-23-467

C. Established Cost Recovery

Cost recovery for the PTR program will be implemented through an established cost-recovery mechanism for ECO programs through the Company's CIP Rider.⁴ On March 20, 1995, the Commission approved Xcel Energy's request to implement a CIP Adjustment Factor (Docket No. E002/M-94-1016). This bill rider (known as the CIP Rider), adjusted annually, provides the Company with a secondary cost recovery method above the amounts included in base rates (Conservation Cost Recovery Charge or CCRC). The CIP Adjustment Factor is normally approved by the Commission for a 12-month period beginning in the month following the Commission's approval and is calculated by dividing the forecasted CIP tracker balance by the forecasted sales (kWh or therms) for the period over which the adjustment will be in place. Xcel Energy is required to file a recalculation of its CIP Adjustment Factors each April in conjunction with its financial incentive and ECO status report filings.

We believe the costs articulated in this Petition for the PTR program fit within the ECO portfolio and therefore should be recovered under the CIP Rider as part of the CIP Adjustment Factor process.

² Saver's Switch is the only program that does not have a customer agreement. This program has been part of the rate tariff since the early 1990's.

³ There are three active programs that are not part of the ECO Portfolio, all of which are or were originally rate discounts versus rebates.

⁴ ECO replaced "CIP" in 2021, however, the name of the rider itself has not been changed.

In sum, the Company has a long history of providing DR programs as part of our demand side management offerings in ECO, and the PTR program fits squarely among those offerings. The proposed procedural pathway leverages the Company's experience, its existing program offerings, and ECO's framework to implement and recover costs for a PTR program in an efficient and practical manner.

II. BEHAVIORAL DEMAND RESPONSE

The Company has operated a demand management program for behavioral demand response, marketed as "Energy Action Days," since 2022.⁵ The program, which began as a pilot, became an active program as part of the Department's approval of our 2024-2026 Triennial Program.⁶ The Energy Action Days program was designed to achieve demand response by sending event notifications to customers, which encouraged them to make behavioral changes to reduce energy consumption during peak hours. There are no rebates or penalties for participation or non-participation and customers can opt-out at any time.

All electric customers who have agreed to accept email messaging from Xcel Energy (approximately 550,000 customers) were auto enrolled in Energy Action Days. The program uses digital communications and behavioral science messaging to encourage residential customers to reduce energy consumption during peak events. To reduce energy use on these days, customers in Energy Action Days receive communications designed to motivate them to be energy efficient during the specified event window. The overarching strategy is to target a very small change in each participant but cast a large enough net that the number of participants, and thus the aggregate savings, is meaningful.

Our proposed PTR program is in many ways like Energy Action Days, in that it similarly asks customers to voluntarily shift load or reduce usage during peak times. The PTR program, however, would add a direct reward or rebate to customers who act. Given the significant overlap between the two programs, if the PTR program is approved by the Department, we plan to discontinue Energy Action Days.

Leveraging its experience with Energy Action Days, the Company has designed the PTR program to respond to some of the challenges identified in the Company's implementation of the Energy Action Days program. These include meeting cost-

⁵ [Decision, In the Matter of Xcel Energy's Program Modification Request Filed October 28, 2022 Docket No. G,E001/CIP-20-473, Department of Commerce, January 19, 2023.](#)

⁶ [Decision, In the Matter of Xcel Energy's 2024-2026 Energy Conservation and Optimization Triennial Plan, Docket No. G,E002/CIP-23-92, Department Commerce, December 1, 2023.](#)

effectiveness requirements, communication frequency, methods of communications, and how customers can practically reduce load.

III. RESEARCH

In preparation for this Petition, in addition to looking at our experience with behavioral demand response, the Company conducted research and engaged interested stakeholders in the modified program design.

A. Program Research

The Company conducted research to help inform how behavioral programs work, to determine the best fit within Xcel Energy's portfolio of programs, and to develop a program proposal that meets the needs of our customers.

Through both online research and information collected from ESource,⁷ a utilities-focused consulting, research, and data science company, the Company gathered research on 14 PTR programs from across the country, reviewing program aspects such as eligibility, the enrollment process, frequency and duration of events, what baselines are used to determine savings, what rebates are paid for performance and how those rebates are delivered. A summary of utility PTR programs is available in Attachment B.

During the October 31, 2024, Public Utilities Commission,⁸ the Commissioners specifically referenced the PTR program offer by Connexus Energy of Ramsey, Minnesota. In response, the Company met with representatives from Connexus to learn about their program. The two most informative learnings from Connexus were: (1) the incentive being offered to customers is \$1/kWh, and (2) how many times the program was used (2-3 times in 2024).

Overall, the Company found the main reasons why many utilities do *not* offer rebates as part of their behavioral demand response programs include:

- Challenges with cost effectiveness
- Increased complexity of implementation
- Reduced scalability
- Lack of predictability
- Not an effective behavioral motivator

⁷ [E Source website](#)

⁸ [October 31, 2024, Public Utilities Commission Webcast](#), beginning at 26.25.

For utilities that do offer rebates through a PTR program, most programs had the following characteristics:

- Exclude customers already participating in another demand response program or have net metering for distributed energy resources such as solar.
- Use an opt-in strategy to recruit customers.
- Dispatch 5 to 15 events per year, lasting 2-5 hours in duration.
- Leverage a baseline strategy that compares usage from an event day to the usage during a given number of days within a specific period. (Example: Usage during the three highest days over the previous 10 days, excluding weekends and holidays).
- Offer a rebate of \$1/kWh, paid seasonally.

As an example, Commonwealth Edison's PTR program, known as Peak Time Savings⁹ and launched in fall 2014, is one of the longest running programs. They offer an opt-in program, excluding customers participating in AC Cycling or Net Metering. A \$1/kWh rebate is paid monthly as a bill credit. In the 2023 program year, which ended on May 31, 2024, they had one event day, with a two-hour control period. The median season credit earned was \$1.94 per customer with over 333,000 customers earning credits. The benefit-cost ratio was 0.42, which was down from 0.61 in 2022 given some anomalies. However, the program is not expected to be cost effective in the long term; the 15-year cost-effectiveness analysis (2024-2038), assuming future capacity values are like the average in the last three years, is only projected to be 0.75.

B. Stakeholder Feedback

In addition to industry research, the Company conducted two Stakeholder Workgroup sessions in December 2024 and January 2025. The presentations and notes from these meetings can be found in Attachments C. Representatives from Great Plains Institute facilitated both discussions. Seven stakeholders representing five organizations participated in the December discussion, while fifteen stakeholders representing eight organizations participated in the January discussion.

In the December session, the Company provided an overview of the current Residential Demand Response program (including Energy Action Days), shared information gathered on other PTR programs, discussed tradeoffs of certain design

⁹ [Commonwealth Edison Company's Peak Time Savings Program Annual Report for year ending May 31, 2024](#)

components and presented an initial program design and planned regulatory pathway for feedback.

Stakeholders asked clarifying questions regarding the baseline methodology used, quantity of expected events/year, the proposed rebate levels and timing for the rebate distribution. Multiple parties also asked whether the regulatory path influenced the cost recovery for program administration.

Multiple parties noted that the proposal was consistent with their understanding of PTR programs and that the design was consistent with their expectations under the PUC Order.

The Company committed to further research potential impacts of the pathways and follow up on open questions, including:

- a. How the Company would seek cost recovery for the PTR program
- b. Whether the program should be opt-in or opt-out
- c. The appropriate timing of rebate payments to customers
- d. The best option for communicating with customers given legal limitations.

In the January session, the Company provided a recap of the first session, including the open discussion points from the previous meeting and a review of the current Residential Demand Response program, including Energy Action Days. The Company reaffirmed the current Residential Demand Response portfolio was administered through ECO, making it the logical pathway for PTR.

The Company highlighted some development challenges identified between the two meetings (as identified in Attachment C), which included:

- Cost and implementation limitations: There is an ongoing Request for Proposal (RFP) to select an implementation vendor for a variety of services under our ECO programs, including the current Energy Action Days program. Because the programs are so similar, the vendors responding to this RFP will likely be able to deliver the revised PTR program and during the onboarding process the Company will work with the vendor to adjust the Scope of Work (SOW) as needed to accommodate any process changes from Energy Action Days to PTR. However, the RFP schedule will mean that the launch date of a PTR program will not occur until 2026. Additionally, because of the ongoing RFP, access to firm vendor cost estimates is not possible, making it more challenging to establish a proposed budget.
- Overlapping programs: In addition to overlap with the existing Energy Action Days Program, potential overlap with the Residential Time of Use (TOU) rate

could impact customer interest. We proposed promoting the two programs together, however, this may also impact the future savings a customer may have under PTR if they have successfully lowered their baseline because of TOU. Additionally, customers' negative reaction to the initial opt-out structure of the TOU pilot raises concerns about how PTR may be received.

- Unpredictable Load Response: System operators have less confidence in behavioral programs, such as PTR, due to the unpredictable load response.
- MISO Requirements: Updates to the Midcontinent Independent System Operator (MISO) market rules may make it more difficult to utilize a PTR program because of unpredictability of load response.
- Cost Effectiveness: Program cost effectiveness is likely to be a challenge.

The Company presented a refined program design to the Stakeholder Workgroup. Stakeholders asked clarifying questions regarding eligible customer classes, whether automated control systems would be used, the rebate delivery mechanism, baseline methodology and customer target market. Stakeholders also asked if the program design included capital costs and how that may impact the regulatory pathway and cost recovery.

Stakeholders liked the idea of the program. They were supportive of an opt-in strategy given the considerable capital investment required to support an opt-out program. Nevertheless, stakeholders encouraged the Company to consider an opt-out path at some point in the future.

IV. Program Design and Implementation

Considering all the research and stakeholder engagement, the Company proposes a procedural pathway that will allow the Company to submit a PTR program within its ECO portfolio that will provide an opportunity to customers to earn a rebate for lowering their energy usage during a control event after an email or text notification. Customers would receive a notice of results, earn a rebate of \$1/kWh reduction and receive a yearly rebate on their electric bill based on participation. The Company's implementation plan is based on our experience implementing other demand response programs, and specifically behavioral demand response, across our jurisdictions including both Minnesota and Colorado. In this section, we address topics related to the design and implementation of the PTR program.

A. Eligibility

To be eligible for PTR, customers must:

- Be an Xcel Energy residential electric customer with an AMI enabled meter.
- Allow the Company to reach out via email and/or text.
- Not participate in another demand response program (including AC Reward or Saver's Switch).
- Not be under a net metered rate.

Interval data, captured by the AMI meter, is used to calculate the customer's baseline and measure energy usage during control events therefore, data is needed from the AMI meter 10-days prior to the event.

As shown in the list above, eligible customers must not be currently enrolled in other demand response offers, such as AC Rewards or Saver's Switch, and they cannot be a net metering customer, e.g., a customer with onsite solar. This criterion is standard in the industry to reduce the complexity of baseline calculations and ensure savings are not duplicated across multiple programs. In addition, it addresses challenges we found as part of the Energy Action Days program to isolate savings. Since analysis will be done at a more granular level (by customer versus the entire population), we will need to isolate customers by program especially in initial stages of the PTR launch.

1. Responsiveness of load control

It is anticipated that one of the easiest ways for customers to have a significant impact on their electrical usage during peak times would be to reduce their air conditioning use. Since reductions in air conditioning are the focus of AC Rewards and Saver's Switch, it anticipated that there will be significant program overlap. Calculating savings for customers participating in multiple peak shaving programs is challenging and computationally demanding. Therefore, in the initial launch, the program will focus on customers who may have air conditioning, but do not participate in these other demand response programs and will be bringing unique load savings to the program. As we begin to collect data and understand how customers can reduce load during this time, we can revisit this requirement.

2. Opt-in

The PTR program will be proposed as an opt-in program. Energy Action Days is an opt-out program, with customer communications limited to mail, email or by telephone call with landlines. Since some customers do not check their email

frequently and land lines are becoming less common, one of the challenges identified was how to provide more effective communication methods, such as text messages, in the PTR program. In addition, while the Company provided messaging for approximately 550,000 customers through Energy Action Days, experience and research indicates that not all customers are able or willing to reduce their load (behavioral programs allow a choice of control). In fact, given the reduction in load on an event day, we estimate that to date, through Energy Action Days there is a reduction of only 0.016 kW per customer across the full population.

The Company considered an opt-out approach for the PTR program, specifically starting with eligible customers currently enrolled in Energy Action Days. However, it was determined that this approach was inconsistent with peer programs and likely not cost effective. Given the volume of customers eligible for rebates, a multi-year project with a sizable investment in our billing system would be required to support the same number of participants as Energy Action Days. The Company proposes assessing results from an established opt-in program prior to initiating an investment on that scale. Launching the program as an opt-in program with a smaller group of customers will also enable us to start sooner and gather valuable insights regarding the evolution of the program.

By limiting program participation to those not enrolled in other demand response programs, creating an opt-in program that allows for texting, and limiting the software costs of implementation, the Company was able to have PTR meet the cost-effectiveness requirements necessary for ECO as identified further below.

B. Enrollment

The majority of our current demand response programs operate as opt-in offerings, and we will continue this methodology for the PTR program. The customer must take action to participate and sign up for the offering, which requires customers to actively determine which program work best for their homes and lifestyles. As with other DR programs, customers will be able to sign-up online or through a customer representative. In addition, since control events will be based on email and/or text messaging communications, customers will need to provide this information, ensuring that the information is accurate and accessible to the Company and our third-party implementor.

Customers will be encouraged to enroll through the My Account portal on the Xcel Energy website or mobile app or by contacting the Xcel Energy contact center. During enrollment, customers will be invited to supply multiple contact methods including email, texts and landline phone numbers. We have found that

communicating to customers through multiple channels increases participation in demand response events.

Although there are no penalties associated with the program, if a customer chooses to be removed from the program, they can unenroll using the methods listed above.

C. Initial Target Market

As part of Energy Action Days, the Company sends messaging to approximately 550,000 residential customers who have provided a valid email address to Xcel Energy. Of those customers, approximately 300,000 are already enrolled in a demand response offering; since those customers are not eligible for PTR, the number of customers available in the initial target market for PTR is approximately 250,000.

The initial marketing campaigns will aim to recruit the PTR eligible customers via email. Email is a low-cost method to reach customers; and since this group has received Energy Action Days messaging, they are familiar with the program, and most likely to engage in the process and earn rebates based on their efforts. In addition to email, marketing plans will include other low-cost methods. This includes cross promoting the program through other ECO programs and promoting PTR through trade partners and other community groups to attract additional participants including Income Qualified customers. Messaging and educational materials will focus on managing bills, earning rebates and how to reduce a home's energy during an event.

Assuming a six percent response rate, we expect to enroll approximately 15,500 customers in PTR in the first year. The intent is to start with this smaller group of customers in 2026 and then expand to more customers over time. This will allow the Company to work with our third-party implementor, verify savings, test the usage of new AMI equipment and determine what load control strategies and messages are most effective before growing to a larger scale.

D. Program Launch

We plan to implement the program in 2026. As discussed above, timing for the program launch is impacted by the procedural pathway and third-party services to support the program. Once these are finalized, program implementation efforts will need to be completed, including establishing secure data connections with the selected vendor for providing contact information and consumption data (and testing these efforts), updating the Energy Action Days marketing collateral, as well as establishing processes for enrolling/unenrolling in program and rebate processing. The Company will also consider the timing of other customer efforts and the overlap existing

between this offering and rate changes, such as the residential TOU rate, which may impact communication pieces for this program.

E. Control Events

Events will be called based on anticipated system demand and may occur at any time of the year. Based on our experience with Energy Action Days and information gathered from other utilities, the Company estimates an average of three to five events per year. The number of control days may increase as the program grows. PTR will not be registered with MISO, the Company's current event dispatch strategy for the Demand Response product portfolio is at the direction of MISO and internal operations. PTR event strategy will continue to be evaluated for most effective grid relief impacts to balance out the financial commitment.

With its experience with DR programs, the Company knows that it is imperative to any program that requires a voluntary reduction in load to properly engage and educate customers on how to best participate in a program. Successful load shifting requires educating customers before and after an event, while providing practical examples of home usage reduction.

Notifications will be sent up to one day in advance of the event, with a minimum of 1-hour notice of the event. Customers will be notified of events via multiple channels including email, text and Interactive Voice Response (IVR). They will include specific details regarding the event timing and tips on ways to reduce energy consumption during the event.

Within three days of each event, customers will receive an email notifying them of the savings information for that event, as well as a total savings the customer has accumulated over the season. Customers will also receive emails at the beginning of the cooling season to remind them of the program details, offer tips to save energy and reference other energy efficiency programs such as rebates for heating and cooling systems, insulation, or LED lighting that may help customers save energy. An additional email will be sent at year-end to notify the customer of the total rebates earned and details of when they should expect to see the rebate on their bill.

F. Customer Rebates

Customers will receive \$1/kilowatt hour (kWh) saved during control events, which is the industry standard. Savings will be determined using the same methodology as Energy Action Days, which is consistent with other utility PTR programs. Leveraging data available from the customer's AMI meter, the customer's usage during each

event will be compared to a baseline, which is the three highest usage days over the 10-day period prior to the event. The total rebate will be applied as an annual credit on their bill.

Based on an increased savings estimate, as compared to Energy Action Days, of 2.5 kWh per customer, per event, we can estimate an average rebate of \$12.50 per year. (discussed further below)

G. Budget

The annual budget for this program is estimated to be just over \$1.1 million. The main drivers of the budget are the implementation vendor fees and rebates to customers. We provide the breakout of costs below.

Table 1: Electric Budget

Budget Category	2026 Expenses
Vendor	\$800,000
Rebates	\$187,500
Technology Services	\$50,000
Administration	\$80,000
Marketing	\$20,000
Total	\$1,137,500

As mentioned above, because the RFP to select a vendor is ongoing the budgeted implementation cost was based on the Energy Action Days program.

Based on other utility experience, the average peak savings per customer is expected to be 0.63 kW, resulting in 2.5 kWh for each 4-hour event, which translates to \$2.50 per event, per customer. Assuming there are five events per season and 15,500 participants (6 percent of the initial target audience) enrolled in the first year the total rebates are expected to be \$187,500.

Administration to launch and implement the program includes costs for the following: updates to marketing and enrollment materials (from Energy Action Days to PTR) along with event messaging and ongoing participant communications, developing systems to facilitate the enrollment process, establishing and testing data transfers with the implementation vendor and our billing system, and managing event-day activities.

H. Cost Benefit Analysis

The Company has conducted a cost benefit analysis for the PTR program using the methodology for which we conduct an analysis for an ECO program as defined by the Department¹⁰ and used in the 2024-2026 ECO Triennial Plan¹¹. Additionally, we have modified the savings estimates, as noted above, to account for changes in enrollment and participation without overlapping program values which has increased the program potential and addressed some of our cost-effectiveness concerns.

We have used the following details to determine the cost effectiveness.

Table 2: Analysis Assumptions

Quantification	Estimate
Hours/Event	4
Events/Year	5
Beginning Population of Customers (Initial Roll-out)	250,000
Estimated Percent Participation	6%
Participants/Year	15,500
Rebate/kWh	\$1
kW/event	0.63
kWh/event	2.5

The results found in Attachment D, show that the program does pass the cost-effectiveness requirement with a Benefit/Cost Ratio of 1.01¹² using the Minnesota Test, provided the assumptions regarding budget, participation and savings are accurate.

The Minnesota Test uses the electric system impacts, including generation capacity, energy generation and market effects and ancillary services along with electric environmental externalities to arrive at a program benefit value, which is compared to the costs to implement the program including vendor implementation, rebates, promotional costs, labor and administration. Many ECO programs which are mainly composed of equipment installation measures that produce savings over a significant

¹⁰ [Decision, In the Matter of 2024-2026 CIP Cost-Effectiveness Methodologies for Electric and Gas Investor-Owned Utilities, Docket No. E,G999/CIP-23-46 Department of Commerce, March 31, 2023](#)

¹¹ [Decision, In the Matter of Xcel Energy's 2024-2026 Energy Conservation and Optimization Triennial Plan, Docket No. G,E002/CIP-23-92, Department Commerce, December 1, 2023.](#)

¹² Cost-effectiveness results based on the 2026 program year, the anticipated first year of full annual participation.

lifetime and include a cost-benefit analysis based on program spend in a program year compared to the lifetime impacts of the measure installations attributed to program participation. For Demand Response programs, including PTR, the cost benefit analysis is based on the spend in a program year and the corresponding impact within that year attributed to participation in the program. There may be some persistence of impacts and participation beyond the year of program spend attributable to that program spend, such as customer familiarity with the program and the development of enabling technologies to participate more effectively. Those impacts have not yet been estimated and are not included in the cost benefit analysis. In this analysis, the benefits to offer the program slightly outweigh the costs, making the program considered cost effective. The cost-effectiveness results also show the program nearly passes the Rate Impact Measure test, at 0.98, which shows that the program will result in a slight increase in rates, impacting all customers including customers not participating in this program.

I. Program Evaluation & Future Enrollment

Our proposed program will utilize a third-party vendor to analyze data to determine savings and rebate per participant per event. The Company intends in the future to conduct a program evaluation of the program after establishing sufficient participation and considering potential improvements from learnings in the program's initial implementation and will present those results as part of future ECO Status Reports. That timing will enable the Company and customers to have sufficient experience with the program to provide valuable feedback on potential program improvements or enhancements and verify program achievement. Plans for expanded program rollout will be included in the 2027-2029 ECO Triennial Plan.

CONCLUSION

The Company is pleased to submit this Petition for the Commission's consideration. We respectfully request the Commission approve of the Company's proposal to work with the Department of Commerce by submitting a program modification for a Peak Time Rebate program to begin in 2026 as part of the 2024-2026 ECO Triennial Plan.

Dated: March 17, 2025

Northern States Power Company

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 PEAK TIME REBATE
PROGRAM FOR NORTHERN STATES
POWER CO. D/B/A XCEL ENERGY TO
FURTHER THE COMMISSION'S ADVANCED
RATE DESIGN EFFORTS IN DOCKET NO.
E002/CI-24-115.

Docket No. E002/M-24-432

PETITION

SUMMARY OF FILING

Northern States Power Company, doing business as Xcel Energy (Company), submits to the Minnesota Public Utilities Commission (Commission) this Petition for approval to propose replacing the Company's Energy Action Days program with a Peak Time Rebate (PTR) program as part of our 2024-2026 Energy Conservation and Improvement (ECO) Triennial in Docket No. G,E002/CIP-23-92.

Attachment A: Demand Response Programs¹

Program Name	Description	Customer Types	Rate Discount/ Tariffed Program	Rebate	# of Participants ²	Part of ECO Portfolio 2024-2026
Active Programs						
AC*Rewards	AC Rewards seeks to reduce AC load during demand peaks. Participants can receive up-front rebates for enrolling a qualifying thermostat, and receive annual bill credits, in exchange for allowing the Company to temporarily adjust the set point on the thermostat during control events. Currently, certain thermostats from Honeywell, Ecobee, Nest, and Sensi are eligible for enrollment.	Residential/ Small Business	No	Yes	51,283	Yes
Behavioral Demand Response (Also known as Energy Action Days)	BDR is a mechanism to reach out to customers asking them to voluntarily reduce load during peak times. It does not require specific enrolled equipment for the customer, or control equipment by the Company.	Residential	No	No	Approximately 516,000 ³	Yes
Electric Rate Savings (A23,A24,A27 Rates)	The Electric Rate Savings (Peak Control) program is offered to any business customer who can reduce their electric loads during control periods by at least 50 kW during a summer month. In return for being on-call to reduce their electric loads and curtailing load during a control event, they receive a monthly discount on their demand charges. Participants save as much as 50 percent on demand charges over the year. Electric Rate Savings participants are served with our Peak Controlled Service and Peak Controlled Time of Day Service tariffs. Further discounts are available for also controlling loads when energy costs are high, though our Tier 1 Energy Controlled Rider tariff.	Commercial Industrial	Yes	No	1,815	Yes

¹ Residential Water Heating & Battery Connect are not included as it has no customers nor has had a full launch.

² As of December 31, 2024

³ Messages are sent to customers with an active email address as there are associated incentive.

Program Name	Description	Customer Types	Rate Discount/ Tariffed Program	Rebate	# of Participants ²	Part of ECO Portfolio 2024-2026
Peak Partner Rewards	The Peak Partner Rewards program is offered to any business customer that can reduce their electric load during control periods by at least 25 kW between June and September. With Peak Partner Rewards, customers can receive credits on electric bills for agreeing to reduce electric usage during periods of peak energy demand, such as hot summer days. Customers will receive additional bill credits when they reduce their electric usage by their agreed upon amount or more during control periods.	Commercial Industrial	No	Yes	86	Yes
Saver's Switch (Residential and Commercial Air Conditioning and Water Heating Rider)	Saver's Switch® is a load management program available to electric customers with central air conditioning. Participating customers receive a monthly discount on their June through September bills. In exchange for the discounts, participants allow Xcel Energy to cycle their air conditioner on and off during control events, which typically occur on hot, humid summer days. Air conditioners are controlled via a radio operated switch installed by a licensed electrician on or near the customer's air conditioner. .	Residential/ Small Business	No	Yes	Approximately 420,000	Yes
Pilots						
EV Optimization Pilot	Will study the management of the grid impacts of electric vehicles by working with customers to provide schedule options for their daily EV charging. The schedule options ensure charging occurs outside the Company's system peak and are designed to stagger charging times to avoid demand spikes during the off-peak period.	Commercial /Residential	Yes	Yes	2,257	No
Peak Flex Credit Pilot (A28 Rate)	Dispatchable, load-shedding program for commercial customers that provides additional flexibility and optionality to customers who want to design program parameters to work within their operational and business needs. This pilot provides pricing for both peak control events as well as buy-through options for economic control events and includes a tranche of load intended for third-party aggregation.	Commercial Industrial	Yes	No	7	No

Program Name	Description	Customer Types	Rate Discount/ Tariffed Program	Rebate	# of Participants ²	Part of ECO Portfolio 2024-2026
Load Shifting: Commercial Thermal Storage Pilot	Provides study incentives provided to commercial customers for the installation and operation of thermal storage solutions, as well as ongoing credits for the associated daily load shifting.	Commercial Industrial	Yes	Yes	0	No
General Time of Use Pilot (A25 Rate)	Pilot will study new time-varying rate design for a number of commercial and industrial customers. Features both a three-part energy rate and a demand charge differentiated by peak periods. Company will study customer response to rate signals and will provide additional information to participating customers to allow them better information to tailor their energy usage. This pilot is paired with the Critical Peak Pricing Pilot below and is intended to inform the future design of commercial and industrial rates.	Commercial Industrial	Yes	No	16	No
Critical Peak Pricing Pilot (A26 Rate)	Pilot will study new time-varying rate design for a number of commercial and industrial customers. Features a three-part rate that incorporates energy and demand charges into a single volumetric rate. This rate also features a critical peak pricing component, where the Company calls events during times of extreme system peak. This pilot is paired with the General Time of Use Pilot above and is intended to inform the future design of commercial and industrial rates.	Commercial Industrial	Yes	No	0	Yes
Peak Day Partners Pilot	The Peak Day Partners Pilot was launched in October of 2023. The Peak Day Partners (PDP) offers commercial and industrial customers an incentive through a bid-offer process, in exchange for reducing their peak load during periods when demand is high. The product purpose is to provide the Company with an additional power purchase resource to manage system requirements more efficiently during exceptional periods, and the Customer the option of receiving pricing associated with energy supply markets during such periods.	Commercial Industrial	No	Yes	87	Yes

Attachment B - PTR Utility Benchmarking Matrix

Utility	Program Name	Program Website	Program Launch	Incentive	Estimated Frequency	Duration	Restrictions	Offer TOU?	Baseline	Enrollment	Communications	Payments
Ameren Illinois	Peak Time Rewards	Link	2016	Variable (\$0.10 - \$1.50/kWh)	Minimum of 1 event per year	Cap of 20 hours per year	Net metering or Community Solar Subscribers are excluded	No	3 highest days over the previous 14 days. Days with significantly different temp or humidity are excluded	Opt-In	Email, Text, Phone Call	Bill Credit (Monthly)
Avista	Peak Time Rebate Pilot	Link	2023 (Pilot)	\$0.40/kWh	20 per year	2-6 hours	None listed. TOU is eligible.	Opt-In Pilot	3 highest over previous 10	Opt-In Pilot	Email	Bill Credit
BGE	Energy Savings Days	Link	2018	\$1.25/kWh	None Given	None Given	None Given	Opt-In	None Given	Opt-Out	Email, Text, Phone Call, or App Notification	Bill Credit (Monthly)
ComEd	Peak Time Savings	Link	2014	\$1/kWh	3-5 days in the summer	Up to 7 hours	AC Cycling and Net Metering are excluded	Opt-In	Usage history normalized for weather and other variables	Opt-In	Email, Text, Phone Call	Bill Credit (Monthly)
Connexus	Peak-Time Rebate	Link	2018	\$1/kWh	3 – 5 per Month	3 hours	Distributed Generation Excluded	Opt-In	3 highest over previous 10 adjusted for SS	Opt-In	Email and Text	Bill Credit
Consumers Energy	Peak Time Rewards	Link	2016	\$1/kWh	14 per year	4 hours	None Given	Opt-In	Previous days, but no specifics	Opt-In	Email	Bill Credit
Delmarva Power (MD and DE)	Peak Energy Savings Credit	Link	2014	\$1.25/kWh	3-5 days in the summer	3 hours	None listed, but only receive greater of incentive from PTR or other DR Programs	Opt-In	3 highest weekdays over prior 30-day period	Opt-Out	Email, Text, Phone Call	Bill Credit (Monthly)
Dominion (VA)	Peak Time Rebates	Link	2023	\$1.25/kWh	10 per year	4 hours	Smart Thermostat, EV Charging, TOU, Net Metering Excluded	Opt-In	10 prior weekdays	Opt-In	Email and Text	Bill Credit
Pepco	Peak Energy Savings Credit	Link	2013	\$1.25/kWh	3-5 days in the summer	3 hours	None listed, but only receive greater of incentive from PTR or other DR Programs	Opt-In	3 highest weekdays over prior 30-day period	Opt-Out	Phone Call, can request email or text	Bill Credit (Monthly)
PG&E	Power Saver Rewards	Link	2022	\$1/kWh	12 per year	5 hours	Cannot be enrolled in conflicting energy savings programs. Solar customers are permitted	Opt-In	5 highest from 10 previous weekdays (or 3 of 5 weekend) with an adjustment for weather conditions	Opt-In	Email, Text, or App Notification	Bill Credit (End of Year)
PGE	Peak Time Rebates	Link	2019	\$1/kWh	10 – 20 per year	3 hours	SS/Thermostat Programs Excluded	Opt-In	10 prior weekdays	Opt-In	Email and Text	Bill Credit (Monthly)

PSE	Flex Rewards	Link	2023	\$25 for enrolling, \$1/kWh, and \$15 for each year of participation	20 per season	2-4 hours	Other DR Excluded. Can participate if also in stand alone TOU.	Opt-In	4 highest over previous 5 weekdays. Usage 2 hours before and 1 hour after also considered	Opt-In	Email and Text	E-gift Cards (End of Season)
SDG&E	Power Saver Rewards	Link	2022	\$1/kWh	12 per year	5 hours	Cannot be enrolled in other energy incentive programs. Solar customers are permitted	Opt-In	3 highest of previous 5 weekdays or the highest of the 3 previous weekend days or holidays	Opt-In	Email and Text	Bill Credit (Monthly)
Southern California Edison	Power Saver Rewards	Link	2022	\$1/kWh	12 per year	5 hours	Cannot be enrolled in conflicting energy savings programs or TOU EV rate. Solar customers are permitted	Opt-In	5 highest from 10 previous weekdays (or 3 of 5 weekend) with an adjustment for weather conditions	Opt-In	Email, Text, or App Notification	Bill Credit (End of Year)



PEAK TIME REBATE DEVELOPMENT

Stakeholder Meeting | December 2024

December 11, 2024

Agenda

1. Current Demand Response Offerings
2. Experience with Behavioral Demand Response in Minnesota
3. Current Peak Time Rebate programs in other markets
4. Proposed program for Xcel Energy in Minnesota
5. Timeline, Regulatory Pathways, and Budget
6. Questions and Discussion

Meeting Purpose

Xcel Energy will be filing a Peak Time Rebates (PTR) program in March

Stakeholder meetings will give us the opportunity to make sure that we are considering the needs of our customers in this process

Today, we will be sharing what we are considering and proposing at this point for the PTR program

Feedback and discussions from today will be used to refine the program and an update will be given at the next stakeholder meeting

Current Residential DR Programs

2024 – 2026 ECO Filing

Energy Action Days – Program to encourage customers to reduce electricity use when the demand is high by sending communications with energy savings tips ahead of events

Saver Switch – Xcel Energy installs a switch that will cycle the AC off and on at 15–20 minute intervals on hot days

AC Rewards – Xcel Energy will make adjustments to smart thermostats to reduce electricity use on hot days

Smart Water Heaters – Customers can allow Xcel Energy to control their electric heat pump water heater that is capable of receiving control signals to avoid heating during peak times

MN Battery Connect – Launching 2025, this program will offer customers an incentive to use their home BESS to offset their electric needs from the grid during peak times

Current Energy Action Days Background

Energy Action Days was launched in Q4 of 2022

Customers receive welcome to Energy Action Days email introducing the program

Customers receive messages via email to encourage a reduction in energy consumption during peak events (usually 4-hour events) a few times per summer

All residential customers with adequate contact information that have not previously opted out of Xcel Energy communications are enrolled by default. Customers can opt out.

Program has no incentives and no penalties for non-participation

Customers with AMI receive follow-up email thanking them for their performance

Current Energy Action Days Background



Welcome to Energy Action Days

When extreme temperatures hit, finding ways to save energy is the order of the day, and we can help jump-start your energy management. Starting soon, you'll receive energy-saving tips through our Energy Action Days program – an easy way to join your community in saving energy and managing your bill during extreme temperatures.

Saving energy on Energy Action Days is simple. You'll join your community in saving energy, managing your bill and reducing strain on the energy grid – leading to a more sustainable future for everyone. We'll notify you by email when Energy Action Days are approaching so you can take steps to lower your energy use, like adjusting your air conditioning or delaying the use of large appliances until off-peak hours.

For more information about the program, visit Customer Service at my.xcelenergy.com/customersupport/s and enter the keywords **Energy Action Days**.



Acct # *****22-1

Today is an Energy Action Day. Help keep everyone cool when energy demand is highest.

For example, increase your thermostat by 2 - 4 degrees for 3 - 4 hours during:

April 25
3pm – 7pm

Ways to Save

Enjoy unplugged activities during Peak Events

Put off running the dishwasher or doing laundry until after the Peak Event. Instead of watching TV or using electronics that need to be plugged in, read a book, play a board game, or spend quality time with your household.

Turn off lights when they're not in use

Turn off or reduce lighting in areas that aren't occupied. In areas that are occupied during Energy Action Days, try to reduce your lighting and take advantage of natural sunlight or spot lighting instead.

Use a plug-in power meter to save

Plug-in power meters show you how much power your electronics and appliances use. Use a power meter to learn which devices use the most electricity and make sure to turn off and unplug those high users during Energy Action Days.

SEE MORE WAYS TO SAVE

Current Energy Action Days Performance

Included customers at start of season: approximately 550,000

Event history:

Timeframe	Events
Fall/Winter 2022/2023	4
Summer 2023	5
Summer 2024	3

Performance: averaging about 0.02-0.03kW load reduction per customer

Current Peak Time Rebate Market

Benchmarked 13 PTR programs across multiple states

Overall programs are very consistent in how they run

- Call an event
- Measure use against a baseline
- Incentives paid based on performance

Variables include:

- Incentive Amount
- Frequency and Duration
- Incentive Delivery

Connexus Program

Offer a \$1/kWh Incentive

Customers opt-in and can choose email or text notifications

Marketing materials state 3 – 5 days per month that qualify with most events lasting approximately 3 hours

Customers that participate in their AC program can also participate in PTR with a modified incentive

Customers that have solar are not eligible to participate

Additional Program Comparisons

Incentive Levels

- 8 programs offer \$1/kWh
- 4 programs offer \$1.25/kWh

Program Exclusions

- 8 programs exclude other DR participation
- 4 programs exclude solar

Event Quantity and Length

- Typically 2 – 5 hours
- Typically 5 – 15 events each year

Enrollment

- 10 are opt-in

Xcel Energy Program Proposal

Participation will require AMI equipment to determine incentives

Program enrollment considerations

- Opt-In program would allow for additional outreach methods but would introduce other complications with recruiting and enrollment.
- Since there are no penalties associated with not participating an opt-out structure would maximize program size and avoid recruitment costs and time, but outreach methods are limited

Program qualification

- Excluding customers in other DR programs would avoid double incentives if PTR events coincide with other DR programs, but excluding these customers would create a much smaller pool of eligible customers.
- Customers who participate in net metering and storage may make baseline calculations more complex. Recommend to exclude solar and storage customers.

Xcel Energy Program Proposal

Maximum of 10 events per year

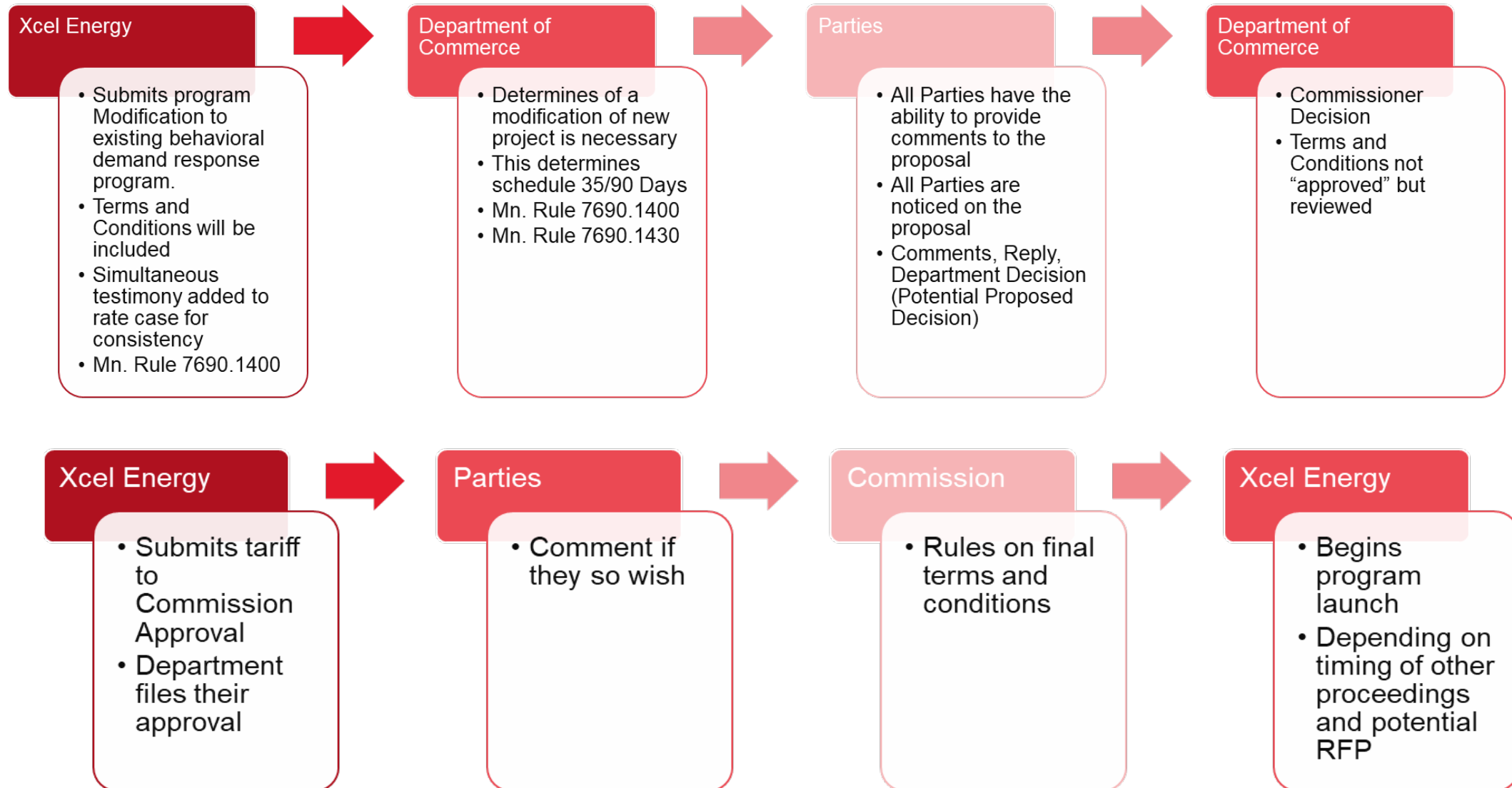
Duration of events would be up to 4 hours depending on need

Email notifications by default

\$1/kWh saved from Baseline

Incentive at the end of the season with information shared after each event

Proposed Regulatory Pathway





Meeting Minutes – Xcel Peak Time Rebate Discussion 12/11/2024

Xcel Attendees	Stakeholder Representatives
Stephen Mullaly	Brandon Crawford, Citizens Utility Board of Minnesota
Patrik Ronnings	Olivia Carroll, Citizens Utility Board of Minnesota
Kris Kohls	Grey Staples, Mendota Group LLC
Jessica Peterson	Joseph Cherney, The Office of the Attorney General, Residential Utilities Division
Tim Randle	Peter Scholtz, The Office of the Attorney General, Residential Utilities Division
Karl Shlanta	Laura Silver, Department of Commerce
Nick Paluck	Eden Fauré, Stoel Rives LLP
Amber Hedlund	
Facilitation	
Trevor Drake, Great Plains Institute	
Benjamin Stafford, Great Plains Institute	

Trevor Drake provided a brief description of the agenda and led the introduction of participants. Xcel Energy (Xcel) planned to provide an overview of their efforts to develop a Peak Time Rebate (PTR) program, consistent with the Order of the Minnesota Public Utilities Commission (PUC). Xcel was seeking feedback in an informal forum. Xcel plans to consider feedback from stakeholders, to continue to develop the PTR design, and to reconvene with stakeholders in January in advance of filing a PTR program proposal with the PUC in March 2025.

Xcel presented the results of their existing demand response programs. Xcel discussed the performance of the Energy Action Days program from their Energy Conservation and Optimization (ECO) program, which is like a PTR program.

Xcel presented a review of PTR programs from other utilities. The review focused on specific PTR program design elements. Two important design elements included the size of incentives for consumers and the design of opt-in or opt-out requirements for PTR program participation. On consumer enrollment, Xcel noted tradeoffs for consideration in Minnesota. For example, opt-in programs tend to attract those customers most likely to change their behavior. For opt-in customers, Xcel can communicate with program participants via multiple channels, such as email, land line telephone, and text message. Opt-in programs allow for greater engagement, which does increase program administrative costs.

For opt-out considerations, PTR programs offer only an incentive to change behavior, and do not impose penalties. Greater enrollment could increase participation. However, opt-out enrollment does not allow Xcel to contact customers without consent. Xcel cannot communicate with participants other than by primary email and land line telephone unless granted consent. Further, landline telephones are considered an ineffective means of reaching customers given the low prevalence of landlines associated with accounts.

Xcel proposed its program. Participation would require customers to be on advanced metering infrastructure (AMI). Xcel noted opt-in and opt-out were still under consideration and sought stakeholders' feedback. Xcel noted that customers in the PTR program should be excluded from participation in other demand response offerings to avoid double incentives. Xcel proposed that net metering solar customers would not be eligible for the PTR program. This is because calculating the deviation from baseline usage is challenging for solar customers due to the variable behavior of solar systems. Xcel proposed ten events per year, each event lasting up to four hours, using email as the default mode of communication to customers, and providing the incentive at the end of a season (as opposed to after each event within the billing cycle).

Stakeholders asked clarifying questions and offered feedback on Xcel's PTR program proposal. A residential customer advocate clarifying that opt-out designs imposes limits for Xcel in their ability to text customers in the program. Xcel noted that text is the most effective way to reach customers, and that the current opt-out requirements do not permit Xcel to use text for the program.

Multiple parties discussed the size and timing of distribution of incentives to customers. Stakeholders discussed the proposed incentive amount. Xcel noted the incentive size was consistent with other utility programs. Xcel noted that a few utility PTR programs offer points and gift cards as incentives, which impose additional administrative costs. A consumer advocate sought clarification on the reason for providing the incentive at the end of a season rather than within the billing cycle. Xcel noted that their main motivation was to simplify the billing cycle. Xcel found in their research of PTR program design that there was a split of utilities that provided incentives in billing cycle versus at the end of a season.

A consumer advocate asked about the baseline methodology for calculating the baseline against which the incentive is calculated. Xcel expected to use a baseline similar to their Energy Action Days program, which uses a baseline based upon the three highest of ten previous non-weekend, non-holiday event days within the Energy Action Days program. Xcel noted the company continues to research appropriate methods for establishing baselines.

Xcel asked if stakeholders had opinions on opt-in versus opt-out program enrollment. A consumer advocate recognized the tradeoffs in respect to the ability to text program participants and did not have a final position on enrollment design. Xcel noted that in their work with a vendor, the vendor noted that opt-in programs attract more willing customers, and those customers gain the most benefits. A consumer advocate asked if it was possible to set up a process for text messages to consumers in an opt-out enrollment. Xcel stated they would discuss that option internally.

A consumer advocate asked if there were programs that used a minimum number of events per year. Currently, the Energy Action Days program declares events with advice of distribution system operators, with no minimum days per year and a maximum of ten days. Xcel noted in their research that Ameren in Missouri administers a utility program with a minimum of one event per year. Xcel noted most utility programs have a maximum number of event days or hours in their PTR program designs. Xcel noted that consumer behavior program vendors suggest that a greater number of events is more likely to sustain customer engagement, but there are tradeoffs with administrative costs.

A regulator suggested that Xcel may wish to seek behavioral scientists to help with design aspects.

Multiple parties noted that Xcel's proposal was consistent with their understanding of PTR programs. Multiple parties also noted that the design was consistent with their expectations under the PUC Order.

Xcel presented regulatory pathways to put the PTR in place. Xcel suggested that the PTR fits in their ECO filing. Within ECO, there are two options – (1) proposing the PTR as a modification to the Energy Action Days program [Xcel's current preferred option]; or (2) proposing a new program within ECO. In option (1out), Xcel forecasted seeking approval in the May-June 2025 timeframe with program administration beginning in late summer of 2025. Alternatively, Xcel could seek to get a new rate and tariff approved for the PTR program. Xcel believes that this alternative is less clear on timing.

Multiple parties asked whether the distinct regulatory paths influenced the recovery of costs for program administration. Xcel believed that the paths would vary. Xcel committed to further researching the potential impacts of the pathways on cost recovery.

Open questions included:

- How will Xcel seek cost recovery for the PTR program, based on regulatory pathway options?
- Should the program be opt-in or opt-out?
- What is the appropriate timing of incentive payments to customers?
- What is the best option for communicating with customers given the legal limitations Xcel may face (e.g., unable to text without authorization)?

Xcel noted decisions made by the PUC in a 12/12 hearing would influence the next steps in PTR program design. Xcel expects a next conversation with stakeholders on the PTR proposal to take place the morning of January 29, 2025.



PEAK TIME REBATE DEVELOPMENT

Stakeholder Meeting | January 2025

January 29, 2025

Agenda

1. Introductions
2. Meeting Purpose
3. Recap of the First Meeting
4. Challenges in Development
5. Proposed program for Xcel Energy in Minnesota
6. Regulatory Pathway
7. Questions and Discussion



Meeting Purpose

Xcel Energy will be filing a Peak Time Rebates (PTR) program in March

Stakeholder meetings will give us the opportunity to make sure that we are considering the needs of our customers in this process

Today, we will be sharing what considerations have been made to help inform the program development since the last stakeholder meeting

Feedback and discussions from today will be used to further refine the program ahead of filing

Meeting 1 Recap

Reviewed current Demand Response programs, specifically Energy Action Days

Reviewed past results of Energy Action Days

Discussed other utility PTR program structures

Shared proposal for a PTR program and program variables

- Opt-in vs Opt-out and exclusions to participation
- Discussion on incentive payments and what timing is most appropriate
- What is the best option for communicating with customers given legal limitations (e.g., unable to text without authorization) and how can we expand those methods



Open Discussion Points

- How will Xcel Energy seek cost recovery for the PTR program, based on regulatory pathway options?
- Should the program be opt-in or opt-out?
- What is the appropriate timing of incentive payments to customers?
- What is the best option for communicating with customers given the legal limitations Xcel Energy may face (e.g., unable to text without authorization)?



Current Residential DR Programs

2024 – 2026 ECO Filing

Energy Action Days – Program to encourage customers to reduce electricity use when the demand is high by sending communications with energy savings tips ahead of events

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AC Rewards – Xcel Energy will make adjustments to smart thermostats to reduce electricity use on hot days

Smart Water Heaters – Customers can allow Xcel Energy to control their electric heat pump water heater that is capable of receiving control signals to avoid heating during peak times

MN Battery Connect – Launching 2025, this program will offer customers an incentive to use their home BESS to offset their electric needs from the grid during peak times



Development Challenges

There is an ongoing RFP that will determine the vendor of this program

Once a contract is awarded and signed, the vendor will need to integrate with Xcel Energy systems

Timing of vendor onboarding will drive a 2026 launch of PTR with EAD in place for 2025

TOU has not been finalized, and PTR rebates should complement whatever TOU rate is set, not conflict, and be marketed together in a way to avoid customer confusion



Program Risks

BDR and PTR cannot run concurrently, so BDR will end

- How to position PTR in the DR portfolio to avoid customer confusion and encourage participation

Planning and Operations

- Less confidence in behavioral programs due to unpredictable load response
- Market rules are currently being updated by the Midwest Independent System Operation (MISO) making it difficult to utilize here

Customer Satisfaction

- Messaging around bill savings has the potential to erode customer trust since the utility cannot promise individual actions will result in bill savings
- TOU has had a negative reaction so there are concerns how this program might be received and how best to message TOU and PTR together

Cost Effectiveness when paying rebates and more robust data and billing processes will be a challenge, at least in the short term



Xcel Energy Updated Program Proposal

The program will be an Opt-in program, which is most common in the industry

- Focus the program on those that are most interested in participating for greater engagement and to maximize program yield
- Increase communication options that an opt-out program might not offer
- Simplify rebate processing and integration with the billing system to reduce complexities and cost



Xcel Energy Updated Program Proposal

Customers with net metering, such as solar or BESS, will be excluded

- Net metering creates considerable challenges for accurately calculating baseline

Customers in other DR programs will be excluded, which is common in the industry

- High risk of double rebate for reduced energy use through another DR program
- Including other DR programs in the baseline will add complexity and cost to the program

Xcel Energy Updated Program Proposal

Incentives will be the industry standard of \$1/kWh

Baseline will be consistent with MN BDR as 3 highest usage days out of previous 10 (excluding holidays and weekends)

Maximum of 10 event days per year

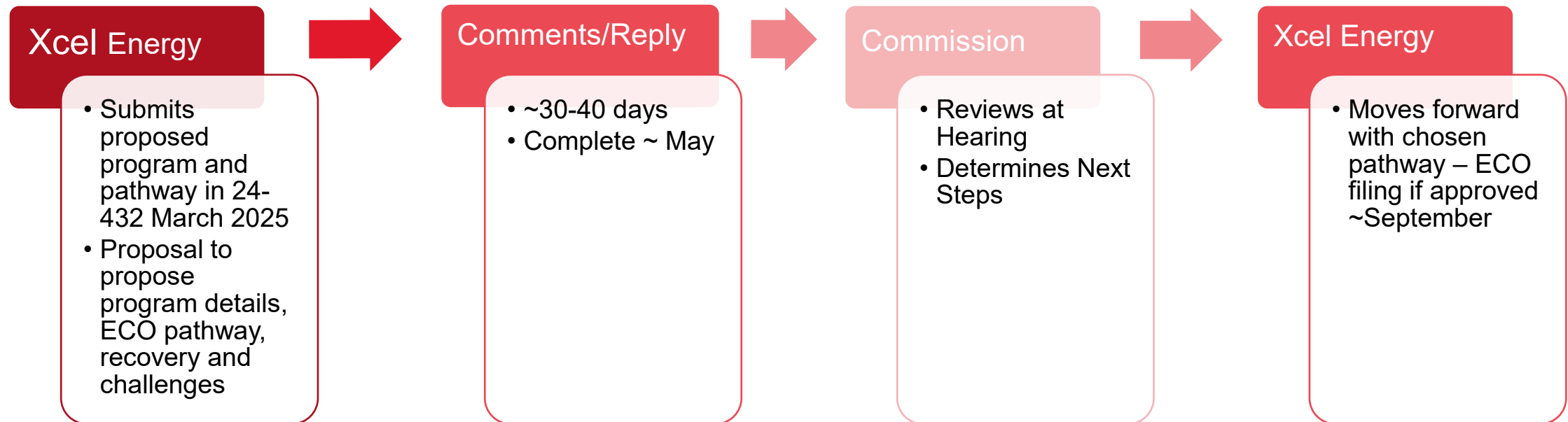
Maximum of 4 hours per event day

Incentives will be paid at the end of the season



Proposed Regulatory Pathway

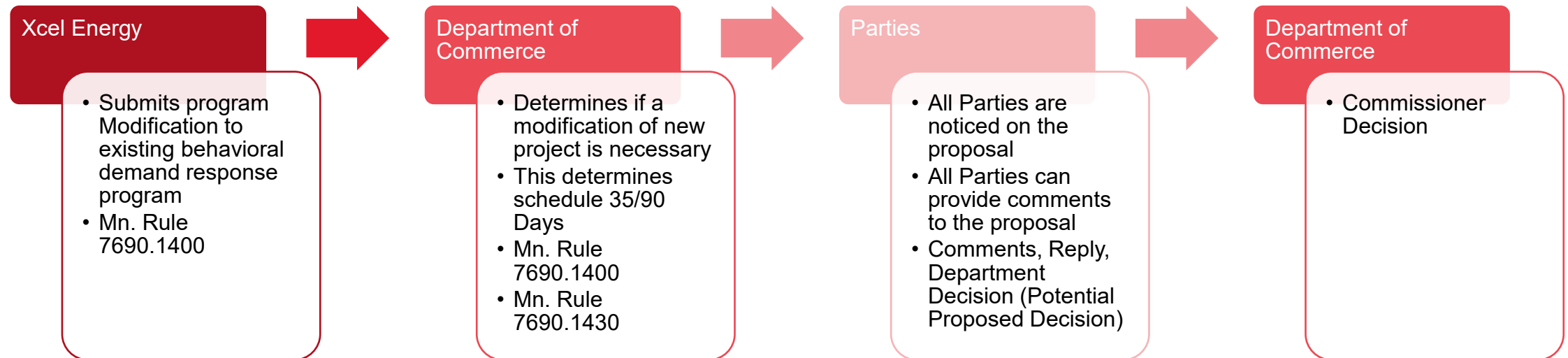
_____ for a peak-time rebate (PTR) program for Xcel Energy, which Xcel shall file by March 17, 2025. The docket shall also evaluate **avenues for cost recovery** of the PTR program, including possible incorporation into the current rate case proceeding before a final Order is issued.



As an incentive program, the rules, terms and applications will be like all other ECO programs

Proposed Regulatory Pathway

ECO Process



Cost Recovery

Expenses for ECO programs are approved by the Department of Commerce; but

The DSM Rider and recovery of costs is approved by the Public Utilities Commission on a yearly basis. (Most recent request can be found in 24-50)

The DSM Rider is also seen in the rate case proceeding as the CCRQ is adjusted as part of the rider calculation

Minnesota Statute §216B.241 Subd. 2b. **Recovery of expenses.**

(a) The commission shall allow a public utility to recover expenses resulting from an energy conservation and optimization plan approved by the department under this section and contributions and assessments to the energy and conservation account, unless the recovery would be inconsistent with a financial incentive proposal approved by the commission.



Discussion and Questions

- How will Xcel seek cost recovery for the PTR program, based on regulatory pathway options?
- Should the program be opt-in or opt-out?
- What is the appropriate timing of incentive payments to customers?
- What is the best option for communicating with customers given the legal limitations Xcel may face (e.g., unable to text without authorization)?



Xcel Energy Peak Time Rebate Development

Meeting #2 Notes

January 29, 2025

Attendees

Xcel Energy Attendees	Stakeholder Representatives
Stephen Mullaly	Alex Zhou, Oracle OPower
Patrik Ronnings	Andrew Bahn, MN Dept of Commerce
Kris Kohls	Brandon Crawford, CUB MN
Jessica Peterson	Cory Hetchler, Connexus
Tim Randle	David Zussman, Oracle OPower
Karl Shlanta	Eden Faure, Stoel Rives LLP
Nick Paluck	Jamie Caplan, Oracle OPower
Amber Hedlund	Jason Burns, Ottertail Power
John Seyfer	Jason Grunier, Ottertail Power
	Olivia Carroll, CUB MN
	Peter Teigland, MN Dept. of Commerce
	Rachel Wiedewitsch, MN Dept. of Commerce
	Steve Coleman (individual)
	Steve Green, Oracle OPower
	Will Mulhern, Fresh Energy

Facilitation
Trevor Drake, Great Plains Institute
Aileen Cole, Great Plains Institute

Presentation on Refined Program Design

Stephen Mullaly of Xcel Energy presented on the company's revised proposed PTR program design, in response to questions and feedback from this group's first meeting.

1. Development challenges/uncertainties

- Ongoing RFP to determine program vendor—once contract awarded/signed, vendor will need to integrate w/ Xcel systems. Timing of vendor onboarding will drive 2026 PTR program launch w/ Energy Action Days (EAD -- company's current behavioral demand response program) continuing through 2025.
- Time-of-Use (TOU) rate design not yet finalized, and PTR rebates should complement (not conflict with) the TOU rates. TOU and PTR should be marketed so as to avoid confusion.

2. Program risks

- EAD and PRT cannot run concurrently, so EAD will end. Need to avoid customer confusion.
- Planning and operations
 - Less confident in behavioral programs due to unpredictable load response

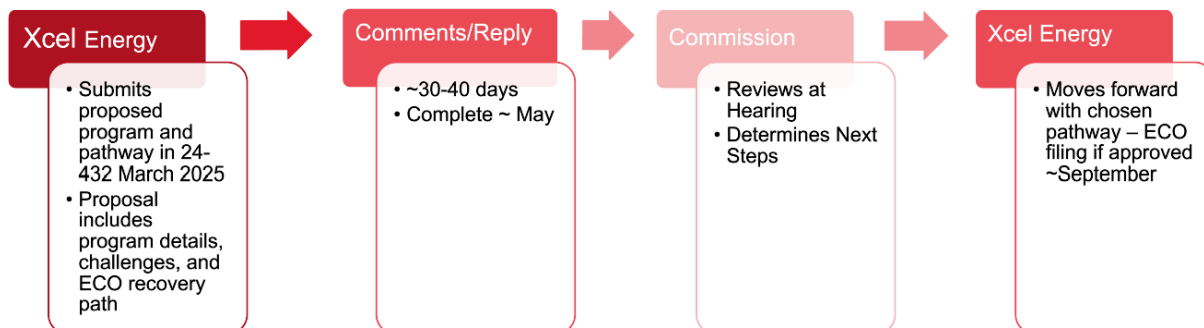
- ii. MISO market rule changes make it more difficult to register PTR as a MISO resource.
 - c. Customer satisfaction
 - i. Messaging around bill savings can erode customer trust because Xcel cannot inherently promise that program participation will result in bill savings.
 - ii. TOU has had negative reaction—concerns about program reception and how to best message TOU and PTR together
 - d. Cost effectiveness when paying rebates and more robust data and billing processes will be a challenge, at least in short term
 - i. PTR will need more robust data than EAD
 - ii. PTR requires customer-level meter data, to be transferred to vendor
 - iii. Integration with billing systems to process rebates
- 3. **Updated program proposal**—decided best to start small/simple, then grow/expand as they learn more. Company proposes the following:
 - a. Opt-in (most common in industry)
 - i. Enables program focus on those most interested in participating for greater engagement and to maximize program yield.
 - ii. Increase communications options (which an opt-out program might not offer): EAD is email notification. Currently with opt-out, only email and calls to landlines are available. Switching to opt-in allows opening up to text messaging and cell phone calls. Opt-out would require working with legal to approve these communications methods.
 - iii. Simplify rebate processing and integration w/ billing system to reduce complexities, cost.
 - b. Exclusions
 - i. Net metering customers (solar, BESS) and customers enrolled in other DR programs would be excluded
 - 1. Net metering makes calculation challenging
 - 2. High risk of double incentivizing load savings for load shed through other DR programs
 - 3. Common industry practice
 - c. Events and Incentives:
 - i. \$1/kWh for load shed during event
 - ii. Baseline will be consistent with MN BDR: 3 highest usage days out of previous 10 (excluding holidays and weekends)
 - iii. Max 10 event days per year
 - iv. Max 4 hrs per event day
 - v. Incentives to be paid at end of year
 - vi. Will issue communications at end of each event
 - d. Would start off much smaller than BDR—start small, learn, expand

Presentation on Proposed Regulatory Pathway

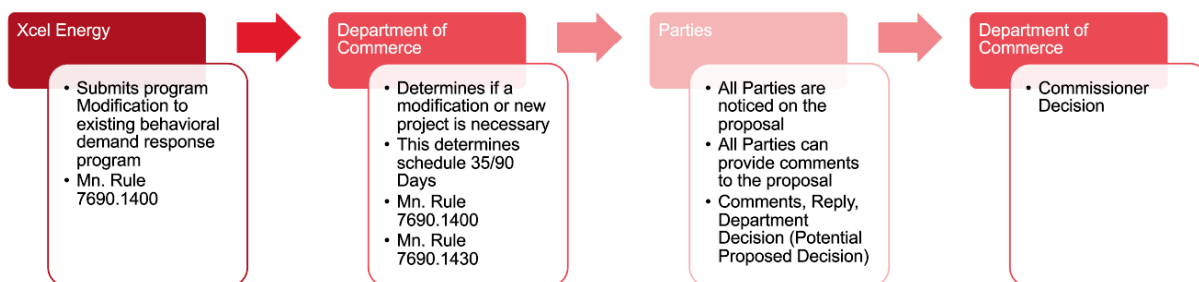
Kris Kohls of Xcel Energy presented on the company's proposed regulatory pathway for the PTR offering.

4. Initial submission to PUC:

- a. MPUC directed exec sec to open tocket to evaluate proposal for a PTR program for Xcel, to be filed by March 17. Docket to also evaluate avenues for cost recovery (Xcel proposes recovery through ECO—if approved, would include in ECO filing in Sept). If in ECO, would be consistent with ECO program rules



5. If PUC approves, then file with Department under ECO:



6. Notes

- a. MPUC would make ultimate decision regarding program approval
- b. ECO program incentives approved by Dept. of Commerce, but DSM rider for cost recovery is approved by PUC annually (annual CCRQ rate case adjustment)

Discussion and Q&A

Trevor Drake of the Great Plains Institute facilitated Q&A and discussion to solicit feedback on the presentations.

1. Program Design

- a. Q: Does Xcel envision this working differently for different customer classes?
 - i. Xcel: This PTR offering is for residential-only. Not aware of any utility that has a PTR program for commercial customers. Non-res customers would not be eligible. Xcel would like to hear additional info on whether there are PTR programs for commercial customers in other utilities, but isn't aware of any.

- b. Q: Not a direct control, more customer being paid for performance, right? Would there be an automated system in the customer's home?
 - i. Xcel: Would entirely be actions the customer themselves would take. Purely up to customer. Pay for performance, but no penalties if customer cannot participate in this event.
- c. Q: So ideally, everyone should participate?
 - i. Xcel: Lots of customers have other systems in place. If customer participates in another DR program (e.g., Savers Switch), Xcel wouldn't want that customer participating in this more behavioral program. Figuring out how to integrate those might be a future item to explore.
- d. Q: Is this going to be filed and initially pursued as pilot? What would be the limit on # of customers to opt in?
 - i. Xcel: Still considering this—will need to determine costs to determine best number for interim/initial program. Xcel not necessarily considering it a pilot upfront, just smaller scale (and will expand once they become more confident about customer engagement, other requirements)
- e. Q: What does end-of-season payment mechanism look like? Bill credit? Gift card?
 - i. Xcel: Rebate paid on bill
- f. Q: Can you explain strategy regarding weekend/holiday events?
 - i. Xcel: Currently don't include weekends/holidays in EAD program. Anticipate keeping the same. If found that there's high need on weekends/holidays, can consider that, but not in the plans at this time.
- g. Q: What characteristics would you look for to determine who might be most interested? E.g., those already involved in DSM?
 - i. Xcel: Marketing efforts would be targeting customers not participating in a DR program, but might have participated in the past.

2. Regulatory Pathways, Cost Recovery

- a. Q: Seems like marketing, implementation costs likely to go through ECO. What if there's a capital cost?
 - i. Xcel: Currently considering system changes Xcel has control over today, so not envisioning capital costs. Envision going through ECO (program and operation cost). In the future, if any cap costs are necessary, that would be done through a rate case.

3. General Feedback

- a. This program is a great idea—would allow customers to have more power over their own energy usage. Thinks simple enrollment and participation is key. See no reason why a customer wouldn't participate in this, if they're not already participating in another DR program
- b. Supportive, but do see opt-out as a potentially good path forward with this program. Still need to consider and look at opt-in vs opt-out in advance of procedural process. Like ability of customers to opt into text and cell phone calls—program could be opt out with separate/additional opt-in for text/cell service

- i. Reason Xcel avoiding opt-out in the beginning is because of infrastructure costs—supporting opt-out level program would require upfront capital costs.
- c. Seems aligned with typical industry approach. Will likely wait to see Xcel's fully fleshed out proposal before being able to provide more specific feedback.

Next Steps

1. Xcel to flesh out filing, fully pull together proposal
2. To file with Commission in March, including proposal for cost recovery through ECO
3. Any additional thoughts between now and mid-March, send them to GPI or Xcel

Attachment D - The Cost Benefit Analysis

PEAK TIME REBATES			DSM TOTAL				2026	GOAL
2026 Net Present Cost Benefit Summary Analysis For All Participants Benefits (Positive Values) Costs (Negative Values)								
	Participant	Utility	Electric Rate	Gas Rate				
	Test	Test	Impact	Impact	Societal	Minnesota		
	(\$Total)	(\$Total)	(\$Total)	(\$Total)	(\$Total)	(\$Total)		
Electric System Impacts								
Generation Capacity	N/A	1,114,972	1,114,972	N/A	1,114,972	1,114,972		
Transmission and Distribution Capacity	N/A	0	0	N/A	0	0		
Energy Generation	N/A	12,414	12,414	N/A	12,414	12,414		
Market Effects and Ancillary Services	N/A	22,548	22,548	N/A	22,548	22,548		
Subtotal	N/A	1,149,934	1,149,934	N/A	1,149,934	1,149,934		
Gas System Impacts								
Commodity Cost	N/A	0	N/A	0	0	0		
Variable O&M	N/A	0	N/A	0	0	0		
Demand	N/A	0	N/A	0	0	0		
Environmental Compliance	N/A	0	N/A	0	0	0		
Subtotal	N/A	0	N/A	0	0	0		
Environmental Externalities and Non-Energy Impacts								
Electric Environmental Externalities	N/A	N/A	N/A	N/A	2,796	2,796		
Gas Environmental Externalities	N/A	N/A	N/A	N/A	0	0		
Other Fuels Environmental Externalities	N/A	N/A	N/A	N/A	0	0		
Electric Non-Energy Benefits	0	N/A	N/A	N/A	0	0		
Gas Non-Energy Benefits	0	N/A	N/A	N/A	0	0		
Other Fuels Benefits	0	N/A	N/A	N/A	0	0		
Utility Performance Incentives	N/A	0	0	0	0	0		
Utility Non-Energy Benefits	N/A	0	0	0	0	0		
Subtotal	0	0	0	0	2,796	2,796		
Participant Impacts								
Electric Bill	31,537	N/A	(31,537)	N/A	N/A	N/A		
Gas Bill	0	N/A	N/A	0	N/A	N/A		
Participant Rebates and Incentives	0	N/A	N/A	N/A	0	N/A		
Incremental Capital	0	N/A	N/A	N/A	0	N/A		
Incremental O&M	0	N/A	N/A	N/A	0	N/A		
Subtotal	31,537	N/A	(31,537)	0	0	N/A		
Utility Impacts								
Utility Project Costs								
Customer Services	N/A	0	0	0	0	0		
Utility Administration	N/A	(850,000)	(850,000)	0	(850,000)	(850,000)		
Advertising & Promotion	N/A	(100,000)	(100,000)	0	(100,000)	(100,000)		
Measurement & Verification	N/A	0	0	0	0	0		
Rebates	N/A	(187,500)	(187,500)	0	(187,500)	(187,500)		
Other	N/A	0	0	0	0	0		
Subtotal	N/A	(1,137,500)	(1,137,500)	0	(1,137,500)	(1,137,500)		
Benefits	31,537	1,149,934	1,149,934	0	1,152,729	1,152,729		
Costs	0	(1,137,500)	(1,169,037)	0	(1,137,500)	(1,137,500)		
Net Benefit (Cost)	31,537	12,434	(19,103)	0	15,229	15,229		
Benefit/Cost Ratio	INF	1.01	0.98	INF	1.01	1.01		

Energy Efficiency Impacts	
Lifetime (Weighted on Generator kWh)	1.0 years
Lifetime (Weighted on Dth)	0.0 years
T & D Loss Factor (Energy)	8.70%
T & D Loss Factor (Demand)	10.56%
System Coincident kW Saved at Generator	10,365 kW
Annual kWh Saved at Customer	187,500 kWh
Annual kWh Saved at Generator	203,813 kWh
Annual Dth Saved	0 Dth
Electric Participants	0
Gas Participants	0
Beneficial Electrification Impacts	
Lifetime (Weighted on Generator kWh)	0.0 years
Lifetime (Weighted on Dth)	0.0 years
T & D Loss Factor (Energy)	0.00%
T & D Loss Factor (Demand)	0.00%
System Coincident kW Saved at Generator	0.00 kW
Annual kWh Saved at Customer	0 kWh
Annual kWh Saved at Generator	0 kWh
Annual Dth Saved	0 Dth
Electric Participants	0
Gas Participants	0
First year Carbon Emissions Reductions	
Electric Energy Efficiency	52 tons CO2
Gas Energy Efficiency	0 tons CO2
Electric Electrification	0 tons CO2
Gas Electrification	0 tons CO2
Other Fuel Electification	0 tons CO2
TOTAL	52 tons CO2
Lifetime Carbon Emissions Reductions	
Electric Energy Efficiency	52 tons CO2
Gas Energy Efficiency	0 tons CO2
Electric Electrification	0 tons CO2
Gas Electrification	0 tons CO2
Other Fuel Electification	0 tons CO2
TOTAL	52 tons CO2

Note: Dollar values represent present value of impacts accumulated over the lifetime of the measures.

Energy Efficiency Impacts

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Beneficial Electrification Impacts

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Annual kWh Saved at Generator	0 kWh
Annual Dth Saved	0 Dth
Electric Participants	0
Gas Participants	0

First year Carbon Emissions Reductions

Electric Energy Efficiency	52 tons CO2
Gas Energy Efficiency	0 tons CO2
Electric Electrification	0 tons CO2
Gas Electrification	0 tons CO2
Other Fuel Electrification	0 tons CO2
TOTAL	52 tons CO2

Lifetime Carbon Emissions Reductions

Electric Energy Efficiency	52 tons CO2
Gas Energy Efficiency	0 tons CO2
Electric Electrification	0 tons CO2
Gas Electrification	0 tons CO2
Other Fuel Electrification	0 tons CO2
TOTAL	52 tons CO2

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/M-24-432

Dated this 17th day of March 2025

/s/

Victor Barreiro
Regulatory Administrator

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65	Michelle	Dreier	mdreier@electricalassociation.com			null null, null United States	Electronic Service		No	Official 24-432
66	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	Official 24-432
67	Brian	Edstrom	briane@cubminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota St Ste W1360 Saint Paul	Electronic Service		No	Official 24-432

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						MN, 55101 United States				
68	William	Ehrlich	wehrlich@tesla.com	Tesla, Inc.		3500 Deer Creek Rd Palo Alto CA, 94304 United States	Electronic Service		No	Official 24-432
69	Kristen	Eide Tollefson	healingsystems69@gmail.com	R-CURE		28477 N Lake Ave Frontenac MN, 55026-1044 United States	Electronic Service		No	Official 24-432
70	Rebecca	Eilers	rebecca.d.eilers@xcelenergy.com	Xcel Energy		414 Nicollet Mall - 401 7th Floor Minneapolis MN, 55401 United States	Electronic Service		No	Official 24-432
71	Bob	Eleff	bob.eleff@house.mn	Regulated Industries Cmte		100 Rev Dr Martin Luther King Jr Blvd Room 600 St. Paul MN, 55155 United States	Electronic Service		No	Official 24-432
72	Ron	Elwood	relwood@mnlis.org	Legal Services Advocacy Project		970 Raymond Avenue Suite G-40 Saint Paul MN, 55114 United States	Electronic Service		No	Official 24-432
73	Betsy	Engelking	betsy@nationalgridrenewables.com	National Grid Renewables		8400 Normandale Lake Blvd Ste 1200 Bloomington MN, 55437 United States	Electronic Service		No	Official 24-432
74	John	Farrell	jfarrell@ilsr.org	Institute for Local Self-Reliance		2720 E. 22nd St Institute for Local Self-Reliance Minneapolis MN, 55406 United States	Electronic Service		No	Official 24-432
75	Eric	Fehlhaber	efehlhaber@dakotaelectric.com	Dakota Electric Association		4300 220th St W Farmington MN, 55024 United States	Electronic Service		No	Official 24-432
76	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	Official 24-432
77	Mike	Fiterman	mikefiterman@libertydiversified.com	Liberty Diversified International		5600 N Highway 169 Minneapolis MN, 55428-3096 United States	Electronic Service		No	Official 24-432
78	David A.	Fitzgerald	daf@dvclaw.com	Davison Van Cleve		2321 Fairview Ave E #3 Seattle WA, 98102 United States	Electronic Service		No	Official 24-432
79	Lucas	Franco	lfranco@liunagro.com	LIUNA		81 Little Canada Rd E Little Canada MN, 55117 United States	Electronic Service		No	Official 24-432
80	Nathan	Franzen	nathan@nationalgridrenewables.com	Geronimo Energy, LLC		8400 Normandale	Electronic Service		No	Official 24-432

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						Lake Blvd Ste 1200 Bloomington MN, 55437 United States				
81	Daryll	Fuentes	energy@usg.com	USG Corporation		550 W Adams St Chicago IL, 60661 United States	Electronic Service		No	Official 24-432
82	Hal	Galvin	halgalvin@comcast.net	Provectus Energy Development llc		1936 Kenwood Parkway Minneapolis MN, 55405 United States	Electronic Service		No	Official 24-432
83	James	Garness	james.r.garness@xcelenergy.com			null null, null United States	Electronic Service		No	Official 24-432
84	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	Official 24-432
85	Edward	Garvey	garveyed@aol.com	Residence		32 Lawton St Saint Paul MN, 55102 United States	Electronic Service		No	Official 24-432
86	Allen	Gleckner	gleckner@fresh-energy.org	Fresh Energy		408 St. Peter Street Ste 350 Saint Paul MN, 55102 United States	Electronic Service		No	Official 24-432
87	Allen	Gleckner	agleckner@elpc.org	Environmental Law & Policy Center		35 E. Wacker Drive, Suite 1600 Suite 1600 Chicago IL, 60601 United States	Electronic Service		No	Official 24-432
88	Jenny	Glumack	jenny@mrea.org	Minnesota Rural Electric Association		11640 73rd Ave N Maple Grove MN, 55369 United States	Electronic Service		No	Official 24-432
89	Anita	Grace	anita@gracemulticultural.com	GRACE Multicultural		12959 196th LN NW Elk River MN, 55330 United States	Electronic Service		No	Official 24-432
90	Ryan	Granholm	ryan.granholm@afslaw.com	ArentFox Schiff LLP		233 S Wacker Dr. Ste. 7100 Chicago IL, 60647 United States	Electronic Service		No	Official 24-432
91	Heidi	Guenther	hguenther@mncenter.org	Minnesota Center for Environmental Advocacy		1919 University Way St Paul MN, 55104 United States	Electronic Service		No	Official 24-432
92	Todd J.	Guerrero	todd.guerrero@kutakrock.com	Kutak Rock LLP		Suite 1750 220 South Sixth Street Minneapolis MN, 55402-1425 United States	Electronic Service		No	Official 24-432
93	Natalie	Haberman	townsend@fresh-energy.org	Fresh Energy		408 St Peter St # 350 St. Paul MN, 55102 United States	Electronic Service		No	Official 24-432

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
94	Joe	Halso	joe.halso@sierraclub.org	Sierra Club		1536 Wynkoop St Ste 200 Denver CO, 80202 United States	Electronic Service		No	Official 24-432
95	Katherine	Hamilton	katherine@aem-alliance.org	Advanced Energy Management Alliance		1701 Rhode Island Ave, NW Washington DC, 20036 United States	Electronic Service		No	Official 24-432
96	Jason G.	Harp	jason.harp@afslaw.com	ArentFox Schiff LLP		233 S Wacker Dr Ste 7100 Chicago IL, 60606 United States	Electronic Service		No	Official 24-432
97	Matthew B	Harris	matt.b.harris@xcelenergy.com	XCEL ENERGY		401 Nicollet Mall FL 8 Minneapolis MN, 55401 United States	Electronic Service		No	Official 24-432
98	Shubha	Harris	shubha.m.harris@xcelenergy.com	Xcel Energy		414 Nicollet Mall, 401 - FL 8 Minneapolis MN, 55401 United States	Electronic Service		No	Official 24-432
99	Erik	Hatlestad	erik@cureriver.org			117 1st St Montevideo MN, 56265 United States	Electronic Service		No	Official 24-432
100	Kim	Havey	kim.havey@minneapolismn.gov	City of Minneapolis		350 South 5th Street, Suite 315M Minneapolis MN, 55415 United States	Electronic Service		No	Official 24-432
101	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	Official 24-432
102	Todd	Headlee	theadlee@dvigridsolutions.com	Dominion Voltage, Inc.		701 E. Cary Street Richmond VA, 23219 United States	Electronic Service		No	Official 24-432
103	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	Official 24-432
104	Adam	Heinen	aheinen@dakotaelectric.com	Dakota Electric Association		4300 220th St W Farmington MN, 55024 United States	Electronic Service		No	Official 24-432
105	Annete	Henkel	mui@mnutilityinvestors.org	Minnesota Utility Investors		413 Wacouta Street #230 St.Paul MN, 55101 United States	Electronic Service		No	Official 24-432
106	Jessy	Hennesy	jessy.hennesy@avantenergy.com	Avant Energy		220 S. Sixth St. Ste 1300 Minneapolis MN, 55402 United States	Electronic Service		No	Official 24-432
107	Sandra	Henry	sandra.henry@elevatenp.org	Elevate		322 S Green St Ste 300 Chicago IL, 60607 United States	Electronic Service		No	Official 24-432

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
108	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		No	Official 24-432
109	Corey	Hintz	chintz@dakotaelectric.com	Dakota Electric Association		4300 220th Street Farmington MN, 55024-9583 United States	Electronic Service		No	Official 24-432
110	Joe	Hoffman	ja.hoffman@smmpa.org	SMMPA		500 First Ave SW Rochester MN, 55902-3303 United States	Electronic Service		No	Official 24-432
111	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	Official 24-432
112	MJ	Horner	mj.horner@xcelenergy.com			null null, null United States	Electronic Service		No	Official 24-432
113	Samantha	Houston	shouston@ucsusa.org	Union of Concerned Scientists		1825 K St. NW Ste 800 Washington DC, 20006 United States	Electronic Service		No	Official 24-432
114	Lori	Hoyum	lhoyum@mnpower.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	Official 24-432
115	Jan	Hubbard	jan.hubbard@comcast.net			7730 Mississippi Lane Brooklyn Park MN, 55444 United States	Electronic Service		No	Official 24-432
116	Holmes	Hummel	holmes.hummel@cleanenergyworks.org	Clean Energy Works		925 French St NW Washington DC, 20001 United States	Electronic Service		No	Official 24-432
117	Geoffrey	Inge	ginge@regintl.com	Regulatory Intelligence LLC		PO Box 270636 Superior CO, 80027-9998 United States	Electronic Service		No	Official 24-432
118	Casey	Jacobson	cjacobson@bepc.com	Basin Electric Power Cooperative		1717 East Interstate Avenue Bismarck ND, 58501 United States	Electronic Service		No	Official 24-432
119	Travis	Jacobson	travis.jacobson@mdu.com	Great Plains Natural Gas Company		400 N 4th St Bismarck ND, 58501 United States	Electronic Service		No	Official 24-432
120	John S.	Jaffray	jjaffray@jjrpower.com	JJR Power		350 Highway 7 Suite 236 Excelsior MN, 55331 United States	Electronic Service		No	Official 24-432
121	Alan	Jenkins	aj@jenkinsatlaw.com	Jenkins at Law		2950 Yellowtail Ave. Marathon FL, 33050 United States	Electronic Service		No	Official 24-432
122	Andrea	Jenkins	andrea.jenkins@minneapolismn.gov	Minneapolis City of Lakes		350 S 5th St Room 307	Electronic Service		No	Official 24-432

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						Minneapolis MN, 55415 United States				
123	Richard	Johnson	rick.johnson@lawmoss.com	Moss & Barnett		150 S. 5th Street Suite 1200 Minneapolis MN, 55402 United States	Electronic Service		No	Official 24-432
124	Sarah	Johnson Phillips	sjphillips@stoel.com	Stoel Rives LLP		33 South Sixth Street Suite 4200 Minneapolis MN, 55402 United States	Electronic Service		No	Official 24-432
125	Nate	Jones	njones@hcpd.com	Heartland Consumers Power		PO Box 248 Madison SD, 57042 United States	Electronic Service		No	Official 24-432
126	Philip	Jones	phil@philjonesconsulting.com	Alliance for Transportation Electrification		1402 3rd Ave Ste 1315 Seattle WA, 98101 United States	Electronic Service		No	Official 24-432
127	Brendan	Jordan	bjordan@gpisd.net	Great Plains Institute & Bioeconomy Coalition of MN		2801 21st Ave S Ste 220 Minneapolis MN, 55407 United States	Electronic Service		No	Official 24-432
128	Bina	Joshi	bina.joshi@afslaw.com	ArentFox Schiff LLP		233 S Wacker Dr Ste 7100 Chicago IL, 60606 United States	Electronic Service		No	Official 24-432
129	Dan	Juhl	in.another.account.info@juhlenergy.com	Juhl Energy Inc.		1502 17th St SE Pipestone MN, 56164 United States	Paper Service		No	Official 24-432
130	Mahmoud	Kabalan	mahmoud.kabalan@stthomas.edu	University of St Thomas		2115 Summit Ave. Mail OSS100 School of Engineering Saint Paul MN, 55105 United States	Electronic Service		No	Official 24-432
131	Michael	Kampmeyer	mkampmeyer@a-e-group.com	AEG Group, LLC		260 Salem Church Road Sunfish Lake MN, 55118 United States	Electronic Service		No	Official 24-432
132	Nick	Kaneski	nick.kaneski@enbridge.com	Enbridge Energy Company, Inc.		11 East Superior St Ste 125 Duluth MN, 55802 United States	Electronic Service		No	Official 24-432
133	Stacey	Karels	skarels@local563.org	Mankato Area Bldg & Construction Trades Council		310 McKinzie St Mankato MN, 56001 United States	Electronic Service		No	Official 24-432
134	William	Kenworthy	will@votesolar.org			1 South Dearborn St Ste 2000 Chicago IL, 60603 United States	Electronic Service		No	Official 24-432
135	Samuel B.	Ketchum	sketchum@kennedy-graven.com	Kennedy & Graven, Chartered		150 S 5th St Ste 700 Minneapolis MN, 55402 United States	Electronic Service		No	Official 24-432

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
136	Chris	King	chris_king@siemens.com	Siemens		4000 E. Third Ave Suite 400 Foster City CA, 94404 United States	Electronic Service		No	Official 24-432
137	Frank	Kohlasch	frank.kohlasch@state.mn.us		Minnesota Pollution Control Agency	520 Lafayette Rd N. St. Paul MN, 55155 United States	Electronic Service		No	Official 24-432
138	Brian	Krambeer	bkrambeer@mienergy.coop	MiEnergy Cooperative		PO Box 626 31110 Cooperative Way Rushford MN, 55971 United States	Electronic Service		No	Official 24-432
139	Michael	Krause	michaelkrause61@yahoo.com			1200 Plymouth Avenue Minneapolis MN, 55411 United States	Electronic Service		No	Official 24-432
140	Michael	Krikava	mkrikava@taftlaw.com	Taft Stettinius & Hollister LLP		2200 IDS Center 80 S 8th St Minneapolis MN, 55402 United States	Electronic Service		No	Official 24-432
141	Nicolle	Kupser	nkupser@greatermngas.com	Greater Minnesota Gas, Inc.		1900 Cardinal Ln PO Box 798 Faribault MN, 55021 United States	Electronic Service		No	Official 24-432
142	Matthew	Lacey	mlacey@grenergy.com	Great River Energy		12300 Elm Creek Boulevard Maple Grove MN, 55369-4718 United States	Electronic Service		No	Official 24-432
143	Mary	LaGarde	mlagarde@maicnet.org	Minneapolis American Indian Center		1530 E Franklin Ave Minneapolis MN, 55404 United States	Electronic Service		No	Official 24-432
144	Holly	Lahd	holly.lahd@target.com	Target Corporation		33 South 6th St CC-28662 Minneapolis MN, 55402 United States	Electronic Service		No	Official 24-432
145	Carmel	Laney	carmel.laney@stoel.com	Stoel Rives LLP		33 South Sixth Street Suite 4200 Minneapolis MN, 55402 United States	Electronic Service		No	Official 24-432
146	James D.	Larson	james.larson@avantenergy.com	Avant Energy Services		220 S 6th St Ste 1300 Minneapolis MN, 55402 United States	Electronic Service		No	Official 24-432
147	Peder	Larson	plarson@larkinhoffman.com	Larkin Hoffman Daly & Lindgren, Ltd.		8300 Norman Center Drive Suite 1000 Bloomington MN, 55437 United States	Electronic Service		No	Official 24-432

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
148	Kevin	Lee	kleee@bluegreenalliance.org	BlueGreen Alliance		2701 University Ave SE Ste. 209 Minneapolis MN, 55414 United States	Electronic Service		No	Official 24-432
149	Dean	Leischow	dean@sunrisenrg.com	Sunrise Energy Ventures		315 Manitoba Ave Ste 200 Wayzata MN, 55391 United States	Electronic Service		No	Official 24-432
150	Annie	Levenson Falk	annielf@cubminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota Street, Suite W1360 St. Paul MN, 55101 United States	Electronic Service		No	Official 24-432
151	Ryan	Long	ryan.j.long@xcelenergy.com			414 Nicollet Mall 401 8th Floor Minneapolis MN, 55401 United States	Electronic Service		No	Official 24-432
152	Jason	Loos	jason.loos@centerpointenergy.com	CenterPoint Energy Resources Corp.		505 Nicollet Mall 3rd Floor Minneapolis MN, 55402 United States	Electronic Service		No	Official 24-432
153	Susan	Ludwig	sludwig@mnpower.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	Official 24-432
154	Alice	Madden	alice@communitypowermn.org	Community Power		2720 E 22nd St Minneapolis MN, 55406 United States	Electronic Service		No	Official 24-432
155	Kavita	Maini	kmaini@wi.rr.com	KM Energy Consulting, LLC		961 N Lost Woods Rd Oconomowoc WI, 53066 United States	Electronic Service		No	Official 24-432
156	Emily	Marshall	emarshall@lourismarshall.com	Miller O'Brien Jensen, PA		120 S. 6th Street Suite 2400 Minneapolis MN, 55402 United States	Electronic Service		No	Official 24-432
157	Katherine	Marshall	katie.marshall@lawmoss.com	Moss & Barnett		150 S 5th St Ste 1200 Minneapolis MN, 55402 United States	Electronic Service		No	Official 24-432
158	Mary	Martinka	mary.a.martinka@xcelenergy.com	Xcel Energy Inc		414 Nicollet Mall 7th Floor Minneapolis MN, 55401 United States	Electronic Service		No	Official 24-432
159	Gregg	Mast	gmast@cleanenergyeconomymn.org	Clean Energy Economy Minnesota		4808 10th Avenue S Minneapolis MN, 55417 United States	Electronic Service		No	Official 24-432
160	Daryl	Maxwell	dmaxwell@hydro.mb.ca	Manitoba Hydro		360 Portage Ave FL 16 PO Box 815, Station Main Winnipeg MB, R3C 2P4 Canada	Electronic Service		No	Official 24-432

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
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162	Lilly B.	McKenna	lilly.mckenna@stoel.com	Stoel Rives LLP		One Montgomery St Ste 3230 San Francisco CA, 94104 United States	Electronic Service		No	Official 24-432
163	Taylor	McNair	taylor@gridlab.org			668 Capp Street San Francisco CA, 94110 United States	Electronic Service		No	Official 24-432
164	Sally Anne	McShane	sally.anne.mcshane@state.mn.us		Public Utilities Commission	121 7th Place E Suite 350 St. Paul MN, 55101 United States	Electronic Service		No	Official 24-432
165	Stephen	Melchionne	stephen.melchionne@ag.state.mn.us		Office of the Attorney General - Department of Commerce	445 Minnesota Street, Ste. 1400 St. Paul MN, 55101 United States	Electronic Service		No	Official 24-432
166	Thomas	Melone	thomas.melone@allcous.com	Minnesota Go Solar LLC		222 South 9th Street Suite 1600 Minneapolis MN, 55120 United States	Electronic Service		No	Official 24-432
167	Greg	Merz	greg.merz@ag.state.mn.us		Office of the Attorney General - Department of Commerce	445 Minnesota Street Suite 1400 St. Paul MN, 55101 United States	Electronic Service		No	Official 24-432
168	Peder	Mewis	pmewis@cleangridalliance.org	Clean Grid Alliance		570 Asbury St. St. Paul MN, 55104 United States	Electronic Service		No	Official 24-432
169	Joseph	Meyer	joseph.meyer@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	Bremer Tower, Suite 1400 445 Minnesota Street St Paul MN, 55101-2131 United States	Electronic Service		No	Official 24-432
170	Kevin	Miller	kevin.miller@chargepoint.com			254 E. Hacienda Avenue Campbell CA, 95008 United States	Electronic Service		No	Official 24-432
171	Stacy	Miller	stacy.miller@minneapolismn.gov	City of Minneapolis		350 S. 5th Street Room M 301 Minneapolis MN, 55415 United States	Electronic Service		No	Official 24-432
172	David	Moeller	dmoeller@allte.com	Minnesota Power			Electronic Service		No	Official 24-432
173	Marc	Monbouquette	marc.monbouquette@enel.com	Enel X North America, Inc.		846 Bransten Rd San Carlos CA, 94070 United States	Electronic Service		No	Official 24-432

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
174	Dalene	Monsebroten	dalene.monsebroten@nmpagency.com	Northern Municipal Power Agency		123 2nd St W Thief River Falls MN, 56701 United States	Electronic Service		No	Official 24-432
175	Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP		33 South Sixth St Ste 4200 Minneapolis MN, 55402 United States	Electronic Service		No	Official 24-432
176	Christa	Moseng	christa.moseng@state.mn.us		Office of Administrative Hearings	P.O. Box 64620 Saint Paul MN, 55164-0620 United States	Electronic Service		No	Official 24-432
177	Evan	Mulholland	emulholland@mncenter.org	Minnesota Center for Environmental Advocacy		1919 University Ave W Ste 515 Saint Paul MN, 55101 United States	Electronic Service		No	Official 24-432
178	Alan	Muller	alan@greendel.org	Energy & Environmental Consulting		1110 West Avenue Red Wing MN, 55066 United States	Electronic Service		No	Official 24-432
179	Kristin	Munsch	kmunsch@citizensutilityboard.org	Citizens Utility Board of Minnesota		309 W. Washington St. Ste. 800 Chicago IL, 60606 United States	Electronic Service		No	Official 24-432
180	Travis	Murray	travis.murray@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	445 Minnesota St Ste 1400 Saint Paul MN, 55101 United States	Electronic Service		No	Official 24-432
181	Amanda	Myers	amanda@weavegrid.com	Weave Grid, Inc.		222 7th Street 2nd Floor San Francisco CA, 94103 United States	Electronic Service		No	Official 24-432
182	Mark	Nabong	mnabong@nrhc.org	Natural Resources Defense Council		20 N. Wacker Drive #1600 Chicago IL, 60606 United States	Electronic Service		No	Official 24-432
183	Ben	Nelson	benn@cmpasgroup.org	CMMPA		459 South Grove Street Blue Earth MN, 56013 United States	Electronic Service		No	Official 24-432
184	Carl	Nelson	cnelson@mncee.org	Center for Energy and Environment		212 3rd Ave N Ste 560 Minneapolis MN, 55401 United States	Electronic Service		No	Official 24-432
185	David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency		220 South Sixth Street Suite 1300 Minneapolis MN, 55402 United States	Electronic Service		No	Official 24-432
186	Sephra	Ninow	sephra.ninow@energycenter.org	Center for Sustainable Energy		426 17th Street, Suite 700 Oakland CA, 94612 United States	Electronic Service		No	Official 24-432
187	Michael	Noble	noble@fresh-energy.org	Fresh Energy		408 Saint Peter St Ste 350 Saint Paul	Electronic Service		No	Official 24-432

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						MN, 55102 United States				
188	Rolf	Nordstrom	rnordstrom@gpisd.net	Great Plains Institute		2801 21ST AVE S STE 220 Minneapolis MN, 55407-1229 United States	Electronic Service		No	Official 24-432
189	Samantha	Norris	samanthanorris@alliantenergy.com	Interstate Power and Light Company		200 1st Street SE PO Box 351 Cedar Rapids IA, 52406-0351 United States	Electronic Service		No	Official 24-432
190	Christian	Noyce	christian.noyce@state.mn.us		Public Utilities Commission	759 Hague Ave St Paul MN, 55104 United States	Electronic Service		No	Official 24-432
191	David	O'Brien	david.obrien@navigant.com	Navigant Consulting		77 South Bedford St Ste 400 Burlington MA, 01803 United States	Electronic Service		No	Official 24-432
192	M. William	O'Brien	bobrien@mojlaw.com	Miller O'Brien Jensen, P.A.		120 S 6th St Ste 2400 Minneapolis MN, 55402 United States	Electronic Service		No	Official 24-432
193	Ric	O'Connell	ric@gridlab.org	GridLab		2120 University Ave Berkeley CA, 94704 United States	Electronic Service		No	Official 24-432
194	Jeff	O'Neill	jeff.oneill@ci.monticello.mn.us	City of Monticello		505 Walnut Street Suite 1 Monticello MN, 55362 United States	Electronic Service		No	Official 24-432
195	Matthew	Olsen	molsen@otpc.com	Otter Tail Power Company		215 South Cascade Street Fergus Falls MN, 56537 United States	Electronic Service		No	Official 24-432
196	Russell	Olson	rolson@hcpd.com	Heartland Consumers Power District		PO Box 248 Madison SD, 57042-0248 United States	Electronic Service		No	Official 24-432
197	Debra	Opatz	dopatz@otpc.com	Otter Tail Power Company		215 South Cascade Street Fergus Falls MN, 56537 United States	Electronic Service		No	Official 24-432
198	Nate	O'Reilly	nate@iron512.com			851 Pierce Butler Route St Paul MN, 55104 United States	Electronic Service		No	Official 24-432
199	Carol A.	Overland	overland@legalelectric.org	Legalelectric - Overland Law Office		1110 West Avenue Red Wing MN, 55066 United States	Electronic Service		No	Official 24-432
200	John	Pacheco	johnpachecojr@gmail.com			null null, null United States	Electronic Service		No	Official 24-432
201	Greg	Palmer	gpalmer@greatermngas.com	Greater Minnesota Gas, Inc.		1900 Cardinal Ln PO Box 798 Faribault MN,	Electronic Service		No	Official 24-432

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						55021 United States				
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203	Audrey	Partridge	audrey.peer@centerpointenergy.com	CenterPoint Energy Minnesota Gas		212 3rd Ave. N. Suite 560 Minneapolis MN, 55401 United States	Electronic Service		No	Official 24-432
204	Dan	Patry	dpatry@sunedison.com	SunEdison		600 Clipper Drive Belmont CA, 94002 United States	Electronic Service		No	Official 24-432
205	Jeffrey C	Paulson	jeff.jcplaw@comcast.net	Paulson Law Office, Ltd.		4445 W 77th Street Suite 224 Edina MN, 55435 United States	Electronic Service		No	Official 24-432
206	Jose	Perez	jose@hispanicsinenergy.com			1017 L Street #719 Sacramento CA, 95814 United States	Electronic Service		No	Official 24-432
207	Lisa	Perry	lisa.perry@walmart.com			2608 SE J St Bentonville AR, 72716 United States	Electronic Service		No	Official 24-432
208	Jennifer	Peterson	jjpeterson@mnpower.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	Official 24-432
209	Catherine	Phillips	catherine.phillips@wecenergygroup.com	Minnesota Energy Resources		231 West Michigan St Milwaukee WI, 53203 United States	Electronic Service		No	Official 24-432
210	Marcia	Podratz	mpodratz@mnpower.com	Minnesota Power		30 W Superior S Duluth MN, 55802 United States	Electronic Service		No	Official 24-432
211	Hannah	Polikov	hpolikov@aee.net	Advanced Energy Economy Institute		1000 Vermont Ave, Third Floor Washington DC, 20005 United States	Electronic Service		No	Official 24-432
212	J.	Porter	greg.porter@nngco.com	Northern Natural Gas Company		1111 South 103rd St Omaha NE, 68124 United States	Electronic Service		No	Official 24-432
213	Kevin	Pranis	kpranis@liunagroc.com	Laborers' District Council of MN and ND		81 E Little Canada Road St. Paul MN, 55117 United States	Electronic Service		No	Official 24-432
214	David G.	Prazak	dprazak@otpc.com	Otter Tail Power Company		P.O. Box 496 215 South Cascade Street Fergus Falls MN, 56538- 0496 United States	Electronic Service		No	Official 24-432
215	Kenneth	Rance	krance@sabathani.org	Sabathani Community		310 East 38th St Rm #120	Electronic Service		No	Official 24-432

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				Center		Minneapolis MN, 55409 United States				
216	John C.	Reinhardt		Laura A. Reinhardt		3552 26th Ave S Minneapolis MN, 55406 United States	Paper Service		No	Official 24-432
217	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		No	Official 24-432
218	Kevin	Reuther	kreuther@mncenter.org	MN Center for Environmental Advocacy		26 E Exchange St, Ste 206 St. Paul MN, 55101-1667 United States	Electronic Service		No	Official 24-432
219	John	Reynolds	john.reynolds@nfib.org			180 5th St E Suite 260 St. Paul MN, 55101 United States	Electronic Service		No	Official 24-432
220	Whitney	Richardson	whitney.richardson@evgo.com	EVgo Services, LLC		11835 W Olympic Blvd Ste 900E Los Angeles CA, 90064 United States	Electronic Service		No	Official 24-432
221	Noah	Roberts	nroberts@cleanpower.org	Energy Storage Association		1155 15th St NW, Ste 500 Washington DC, 20005 United States	Electronic Service		No	Official 24-432
222	Alice	RobertsDavis	admin.info@state.mn.us	Department of Administration		15 Sherburne Avenue St. Paul MN, 55155 United States	Electronic Service		No	Official 24-432
223	Susan	Romans	sromans@allete.com	Minnesota Power		30 West Superior Street Legal Dept Duulth MN, 55802 United States	Electronic Service		No	Official 24-432
224	Amanda	Rome	amanda.rome@xcelenergy.com	Xcel Energy		414 Nicollet Mall FL 5 Minneapolis MN, 55401 United States	Electronic Service		No	Official 24-432
225	Robert K.	Sahr	bsahr@eastriver.coop	East River Electric Power Cooperative		P.O. Box 227 Madison SD, 57042 United States	Electronic Service		No	Official 24-432
226	Renee	Samson	rsamson@freewiretech.com	FreeWire Technologies		1999 Harrison St Oakland CA, 94612 United States	Electronic Service		No	Official 24-432
227	Joseph L	Sathe	jsathe@kennedy-graven.com	Kennedy & Graven, Chartered		150 S 5th St Ste 700 Minneapolis MN, 55402 United States	Electronic Service		No	Official 24-432
228	Tim	Schaefer	thschaef@gmail.com	Environment MN		211 N 1st St Ste 480 Minneapolis MN, 55401 United States	Electronic Service		No	Official 24-432
229	Kevin	Schlangen	kevin.schlangen@co.dakota.mn.us	Dakota County		2800 160th Street West Rosemount	Electronic Service		No	Official 24-432

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						MN, 55068 United States				
230	Jacob J.	Schlesinger	j Schlesinger@keyesfox.com	Keyes & Fox LLP		1580 Lincoln St Ste 880 Denver CO, 80203 United States	Electronic Service		No	Official 24-432
231	Elizabeth	Schmiesing	eschmiesing@winthrop.com	Winthrop & Weinstine, P.A.		225 South Sixth Street Suite 3500 Minneapolis MN, 55402 United States	Electronic Service		No	Official 24-432
232	Peter	Scholtz	peter.scholtz@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	Suite 1400 445 Minnesota Street St. Paul MN, 55101-2131 United States	Electronic Service		No	Official 24-432
233	Kay	Schraeder	kschraeder@minnkota.com	Minnkota Power		5301 32nd Ave S Grand Forks ND, 58201 United States	Electronic Service		No	Official 24-432
234	Lori	Schultz	lorischultz@minncap.org	Minnesota Community Action Partnership		MCIT Building 100 Empire Dr Ste 202 St. Paul MN, 55103 United States	Electronic Service		No	Official 24-432
235	Christine	Schwartz	regulatory.records@xcelenergy.com	Xcel Energy		414 Nicollet Mall FL 7 Minneapolis MN, 55401-1993 United States	Electronic Service		No	Official 24-432
236	Doug	Scott	dscott@gpisd.net	Great Plains Institute		2801 21st Ave Ste 220 Minneapolis MN, 55407 United States	Electronic Service		No	Official 24-432
237	Dean	Sedgwick	sedgwick@itascapower.com	Itasca Power Company		PO Box 455 Spring Lake MN, 56680 United States	Electronic Service		No	Official 24-432
238	Maria	Seidler	maria.seidler@dom.com	Dominion Energy Technology		120 Tredegar Street Richmond VA, 23219 United States	Electronic Service		No	Official 24-432
239	Will	Seuffert	will.seuffert@state.mn.us		Public Utilities Commission	121 7th PI E Ste 350 Saint Paul MN, 55101 United States	Electronic Service		No	Official 24-432
240	Timothy	Sexton	timothy.sexton@state.mn.us		Minnesota Department of Transportation	395 John Ireland Blvd St. Paul MN, 55155-1899 United States	Electronic Service		No	Official 24-432
241	Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates		7400 Lyndale Ave S Ste 190 Richfield MN, 55423 United States	Electronic Service		No	Official 24-432
242	Patricia	Sharkey	psharkey@environmentallawcounsel.com	Midwest Cogeneration Association.		180 N LaSalle St Ste 3700 Chicago IL, 60601 United States	Electronic Service		No	Official 24-432
243	Bria	Shea	bria.e.shea@xcelenergy.com	Xcel Energy		414 Nicollet Mall Minneapolis	Electronic Service		No	Official 24-432

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						MN, 55401 United States				
244	Doug	Shoemaker	dougs@charter.net	Minnesota Renewable Energy		2928 5th Ave S Minneapolis MN, 55408 United States	Electronic Service		No	Official 24-432
245	Anne	Smart	anne.smart@chargepoint.com	ChargePoint, Inc.		254 E Hacienda Ave Campbell CA, 95008 United States	Electronic Service		No	Official 24-432
246	Amanda	Smith	amanda.smith@state.mn.us		Minnesota Pollution Control Agency	520 Lafayette Rd N St. Paul MN, 55155 United States	Electronic Service		No	Official 24-432
247	Beth	Smith	bsmith@greatermankato.com	Greater Mankato Growth		1961 Premier Dr Ste 100 Mankato MN, 56001 United States	Electronic Service		No	Official 24-432
248	Joshua	Smith	joshua.smith@sierraclub.org			85 Second St FL 2 San Francisco CA, 94105 United States	Electronic Service		No	Official 24-432
249	Ken	Smith	ken.smith@ever-greenenergy.com	Ever Green Energy		305 Saint Peter St Saint Paul MN, 55102 United States	Electronic Service		No	Official 24-432
250	Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.		76 W Kellogg Blvd St. Paul MN, 55102 United States	Electronic Service		No	Official 24-432
251	Trevor	Smith	trevor.smith@avantenergy.com	Avant Energy, Inc.		220 South Sixth Street Suite 1300 Minneapolis MN, 55402 United States	Electronic Service		No	Official 24-432
252	Beth	Soholt	bsoholt@cleangridalliance.org	Clean Grid Alliance		570 Asbury Street Suite 201 St. Paul MN, 55104 United States	Electronic Service		No	Official 24-432
253	Anna	Sommer	asommer@energyfuturesgroup.com	Energy Futures Group		PO Box 692 Canton NY, 13617 United States	Electronic Service		No	Official 24-432
254	Peggy	Sorum	peggy.sorum@centerpointenergy.com	CenterPoint Energy		505 Nicollet Mall Minneapolis MN, 55402 United States	Electronic Service		No	Official 24-432
255	Mark	Spurr	mspur@fvbenergy.com	International District Energy Association		222 South Ninth St., Suite 825 Minneapolis MN, 55402 United States	Electronic Service		No	Official 24-432
256	Sky	Stanfield	stanfield@smwlaw.com	Shute, Mihaly & Weinberger		396 Hayes Street San Francisco CA, 94102 United States	Electronic Service		No	Official 24-432
257	Jamez	Staples	jstaples@renewablenrgpartners.com	Renewable Energy Partners		3033 Excelsior Blvd S Minneapolis MN, 55416 United States	Electronic Service		No	Official 24-432

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258	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	Official 24-432
259	Byron E.	Starns	byron.starns@stinson.com	STINSON LLP		50 S 6th St Ste 2600 Minneapolis MN, 55402 United States	Electronic Service		No	Official 24-432
260	Richard	Stasik	richard.stasik@wecenergygroup.com	Minnesota Energy Resources Corporation (HOLDING)		231 West Michigan St - P321 Milwaukee WI, 53203 United States	Electronic Service		No	Official 24-432
261	Kristin	Stastny	kstastny@taftlaw.com	Taft Stettinius & Hollister LLP		2200 IDS Center 80 South 8th Street Minneapolis MN, 55402 United States	Electronic Service		No	Official 24-432
262	Lindsey	Stegall	lindsey.stegall@evgo.com	EVgo Services, LLC		11835 W Olympic Blvd Ste 900E Los Angeles CA, 90064 United States	Electronic Service		No	Official 24-432
263	Cary	Stephenson	cstephenson@otpc.com	Otter Tail Power Company		215 South Cascade Street Fergus Falls MN, 56537 United States	Electronic Service		No	Official 24-432
264	Scott	Strand	sstrand@elpc.org	Environmental Law & Policy Center		60 S 6th Street Suite 2800 Minneapolis MN, 55402 United States	Electronic Service		No	Official 24-432
265	James M	Strommen	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered		150 S 5th St Ste 700 Minneapolis MN, 55402 United States	Electronic Service		No	Official 24-432
266	Eric	Swanson	eswanson@winthrop.com	Winthrop & Weinstine		225 S 6th St Ste 3500 Capella Tower Minneapolis MN, 55402-4629 United States	Electronic Service		No	Official 24-432
267	Dean	Taylor	dtaylor@pluginamerica.org	Plug In America		6380 Wilshire Blvd, Suite 1000 Los Angeles CA, 90048 United States	Electronic Service		No	Official 24-432
268	Hanna	Terwilliger	hanna.terwilliger@state.mn.us		Public Utilities Commission	121 East 7th Place, Suite 350 Saint Paul MN, 55101 United States	Electronic Service		No	Official 24-432
269	Stuart	Tommerdahl	stommerdahl@otpc.com	Otter Tail Power Company		215 S Cascade St PO Box 496 Fergus Falls MN, 56537 United States	Electronic Service		No	Official 24-432
270	Taige	Tople	taige.d.tople@xcelenergy.com	Northern States Power Company dba Xcel Energy-Elec		414 Nicollet Mall 401 7th Floor Minneapolis	Electronic Service		No	Official 24-432

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271	Pat	Treseler	pat.jcplaw@comcast.net	Paulson Law Office LTD		4445 W 77th Street Suite 224 Edina MN, 55435 United States	Electronic Service		No	Official 24-432
272	Analeisha	Vang	avang@mnpower.com			30 W Superior St Duluth MN, 55802-2093 United States	Electronic Service		No	Official 24-432
273	Nikhil	Vijaykar	nvijaykar@keyesfox.com	Keyes & Fox LLP		580 California St 12th Floor San Francisco CA, 94104 United States	Electronic Service		No	Official 24-432
274	Christopher	Villarreal	cvillarreal@rstreet.org	R Street Institute		1212 New York Ave NW Ste 900 Washington DC, 20005 United States	Electronic Service		No	Official 24-432
275	Julie	Voeck	julie.voeck@nee.com	NextEra Energy Resources, LLC		700 Universe Blvd Juno Beach FL, 33408 United States	Electronic Service		No	Official 24-432
276	Amelia	Vohs	avohs@mncenter.org	Minnesota Center for Environmental Advocacy		1919 University Avenue West Suite 515 St. Paul MN, 55104 United States	Electronic Service		No	Official 24-432
277	Curt	Volkman	curt@newenergy-advisors.com	Fresh Energy		408 St Peter St Saint Paul MN, 55102 United States	Electronic Service		No	Official 24-432
278	Dwight	Wagenius	dwagenius@gmail.com	Minnesota Interfaith Power & Light		4407 E Lake St Minneapolis MN, 55406 United States	Electronic Service		No	Official 24-432
279	Francesca	Wahl	fwahl@tesla.com	Tesla		3500 Deer Creek Rd Palo Alto CA, 94304 United States	Electronic Service		No	Official 24-432
280	Roger	Warehime	roger.warehime@owatonnautilities.com	Owatonna Municipal Public Utilities - Gas		208 S Walnut Ave PO BOX 800 Owatonna MN, 55060 United States	Electronic Service		No	Official 24-432
281	Jenna	Warmuth	jwarmuth@mnpower.com	Minnesota Power		30 W Superior St Duluth MN, 55802-2093 United States	Electronic Service		No	Official 24-432
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285	Justin	Wilson	justin.wilson@chargepoint.com	ChargePoint		240 East Hacienda Ave. Campbell CA, 95008 United States	Electronic Service		No	Official 24-432
286	Joseph	Windler	jwindler@winthrop.com	Winthrop & Weinstine		225 South Sixth Street, Suite 3500 Minneapolis MN, 55402 United States	Electronic Service		No	Official 24-432
287	Robyn	Woeste	robynwoeste@alliantenergy.com	Interstate Power and Light Company		200 First St SE Cedar Rapids IA, 52401 United States	Electronic Service		No	Official 24-432
288	Yochi	Zakai	yzakai@smwlaw.com	SHUTE, MIHALY & WEINBERGER LLP		396 Hayes Street San Francisco CA, 94102 United States	Electronic Service		No	Official 24-432
289	Alicia	Zaloga	azaloga@keyesfox.com	Keyes & Fox, LLP		1155 Kildaire Farm Rd Ste 202-203 Cary NC, 27511 United States	Electronic Service		No	Official 24-432
290	Christopher	Zibart	czibart@atcllc.com	American Transmission Company LLC		W234 N2000 Ridgeview Pkwy Court Waukesha WI, 53188-1022 United States	Electronic Service		No	Official 24-432
291	Kurt	Zimmerman	kwz@ibew160.org	Local Union #160, IBEW		2909 Anthony Ln St Anthony Village MN, 55418-3238 United States	Electronic Service		No	Official 24-432
292	Patrick	Zomer	pat.zomer@lawmoss.com	Moss & Barnett PA		150 S 5th St #1200 Minneapolis MN, 55402 United States	Electronic Service		No	Official 24-432