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September 20, 2021

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

**Re: *In the Matter of Xcel Energy’s Petition for Approval of Electric Vehicle (“EV”) Programs as Part of Its COVID-19 Pandemic Economic Recovery Investments***  
**MPUC Docket No. E-002/M-20-745**

Dear Mr. Seuffert:

The Office of the Attorney General—Residential Utilities Division (“OAG”) respectfully submits this letter in response to the September 9, 2021 reply comments of Xcel Energy (“Xcel” or “the Company”) in the above-entitled matter.

In its initial comments, the OAG demonstrated that Xcel’s proposal to offer EV rebates is not authorized by Minnesota law because it does not involve electric “service”—installing, removing, or repairing equipment or facilities for delivering or measuring electricity.<sup>1</sup> The OAG also explained that even if rebates were utility service, they should be accounted for as an operating expense, rather than a capital asset as Xcel proposes, because rebates are not utility property.<sup>2</sup>

In reply, Xcel suggests that the OAG’s interpretation of Minnesota law is “too limited.” The Company appears to argue that the Commission can approve EV rebates using its authority to set just and reasonable rates under section 216B.03 of the Public Utilities Act.<sup>3</sup> But Xcel skips a critical step in the statutory analysis. The Act defines a “rate” as a charge *for service*.<sup>4</sup> Thus, a “rate” cannot exist without some underlying “service” that meets the statutory definition. As explained in the OAG’s initial comments, offering purchase incentives to shape consumer behavior is not “the installation, removal, or repair of equipment or facilities for delivering or

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<sup>1</sup> See Minn. Stat. § 216B.02, subd. 6 (defining “service”).

<sup>2</sup> See Minn. Stat. § 216B.16, subd. 6 (providing that utility rates should reflect depreciation of and return on “utility property used and useful in rendering service to the public”).

<sup>3</sup> See Minn. Stat. § 216B.03 (defining “reasonable rate”).

<sup>4</sup> Minn. Stat. § 216B.02, subd. 5.

measuring . . . electricity.”<sup>5</sup> Thus, rebates are not service, and approving rebates under section 216B.03 would allow the tail to wag the dog.

Relatedly, Xcel argues that it “provides many rebates to customers through our Conservation Improvement Program (CIP)” and that “[s]imilarly, here, if the Commission agrees that the EV adoption caused by the Company’s proposed investments in rebates is in the public interest and will result in just and reasonable rates, it is within its authority to approve them.”<sup>6</sup> Xcel’s analogy is misplaced because CIP rebates derive from express statutory authority: Section 216B.241 authorizes the Department of Commerce to approve utility CIP, and section 216B.16, subdivision 6b, allows the Commission to grant rate recovery of CIP costs “as if the investments and expenses were directly made or incurred by the utility in furnishing utility service.”<sup>7</sup> Rather than supporting a general Commission authority to approve rebates, therefore, Xcel’s CIP analogy actually suggests that rebates are not utility service and that rate recovery of their costs would require specific authorization from the Legislature. While such specific authorization exists for CIP costs, it does not exist for EV rebates.

Finally, Xcel takes issue with the OAG’s argument that rebates are not utility property and, if approved, should be accounted for as an expense rather than a rate base asset. The Company argues that “there is no requirement that capitalized assets be limited to physical plant” and points out that “[t]he Commission has historically approved rates for the Company that include numerous non-plant assets and liabilities, such as [accumulated] deferred income taxes and the Prairie Island Extended Power Uprate asset.”<sup>8</sup>

Xcel is of course correct that a utility’s rate base may include intangible assets, but this misses the point: Rebates are *expenses*, not assets—tangible or intangible. Moreover, the examples cited by Xcel simply serve to highlight that rebates are unlike the non-plant assets and liabilities that the Commission has allowed in the Company’s rate base. Accumulated deferred income taxes and the Prairie Island Extended Power Uprate asset both relate to core utility operations: the first is a function of the utility’s revenue from electricity generation, while the second represents improvements to a physical generating unit. Rebates, by contrast, are not a byproduct of providing electric service, nor do they otherwise relate to core utility operations.

Transportation electrification has the potential to deliver numerous benefits to Minnesota.<sup>9</sup> Xcel’s EV-rebate proposal, however, is not a good way to promote EV adoption. Utility-funded EV rebates are not authorized by Minnesota law, and even if they were, they would not be in the public interest for the reasons discussed in the OAG’s initial comments: Offering EV-purchase rebates would contribute to economic disparities among the Company’s ratepayers without significantly impacting EV adoption or delivering any incremental net benefits.<sup>10</sup>

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<sup>5</sup> *Id.*, subd. 6.

<sup>6</sup> Xcel Reply Comments at 5 n.6.

<sup>7</sup> Minn. Stat. § 216B.16, subd. 6b(a).

<sup>8</sup> Xcel Reply Comments at 6.

<sup>9</sup> *In the Matter of a Commission Inquiry into Electric Vehicle Charging and Infrastructure*, Docket No. E-999/CI-17-879, Order Making Findings and Requiring Filings at 1, 3–4 (Feb. 1, 2019).

<sup>10</sup> See OAG Initial Comments at 7–12.

Mr. Will Seuffert  
September 20, 2021  
Page 3

For these reasons, the Commission should decline to approve Xcel's EV-rebate proposals. If, however, the Commission does approve EV rebates in some form, it should scale down the program as outlined in the OAG's initial comments and should require Xcel to expense rebate costs rather than capitalizing them.

Sincerely,

/s/ **Peter G. Scholtz**

PETER G. SCHOLTZ

Assistant Attorney General

(651) 757-1473 (Voice)

(651) 296-9663 (Fax)

[peter.scholtz@ag.state.mn.us](mailto:peter.scholtz@ag.state.mn.us)

**CERTIFICATE OF SERVICE**

**Re: *In the Matter of Xcel Energy's Petition for Approval of Electric Vehicle Programs as Part of Its COVID-19 Pandemic Economic Recovery Investments***  
**MPUC Docket No. E-002/M-20-745**

I, JUDY SIGAL, hereby certify that on the 20th day of September, 2021, I e-filed with eDockets *a Letter of the Minnesota Office of the Attorney General—Residential Utilities Division* and served a true and correct copy of the same upon all parties listed on the attached service list by e-mail, electronic submission, and/or United States Mail with postage prepaid, and deposited the same in a U.S. Post Office mail receptacle in the City of St. Paul, Minnesota.

*/s/ Judy Sigal*  
\_\_\_\_\_  
JUDY SIGAL

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Tamie A.	Aberle	tamie.aberle@mdu.com	Great Plains Natural Gas Co.	400 North Fourth Street Bismarck, ND 585014092	Electronic Service	No	OFF_SL_20-745_Official
Michael	Ahern	ahern.michael@dorsey.com	Dorsey & Whitney, LLP	50 S 6th St Ste 1500 Minneapolis, MN 554021498	Electronic Service	No	OFF_SL_20-745_Official
Michael	Alvarez	Michael.Alvarez@longroadenergy.com	Community Wind North, LLC	c/o Longroad Development Company, LLC 330 Congress Street, 6th Fl Boston, MA 02210	Electronic Service	No	OFF_SL_20-745_Official
Kristine	Anderson	kanderson@greatermngas.com	Greater Minnesota Gas, Inc. & Greater MN Transmission, LLC	1900 Cardinal Lane PO Box 798 Faribault, MN 55021	Electronic Service	No	OFF_SL_20-745_Official
Alison C	Archer	aarcher@misoenergy.org	MISO	2985 Ames Crossing Rd Eagan, MN 55121	Electronic Service	No	OFF_SL_20-745_Official
Thomas	Ashley	tom@greenlots.com	Greenlots	N/A	Electronic Service	No	OFF_SL_20-745_Official
Kevin	Auerbacher	kauerbacher@tesla.com	Tesla, Inc.	1050 K Street NW, Suite 101 Washington, DC 20001	Electronic Service	No	OFF_SL_20-745_Official
Anjali	Bains	bains@fresh-energy.org	Fresh Energy	408 Saint Peter Ste 220 Saint Paul, MN 55102	Electronic Service	No	OFF_SL_20-745_Official
Max	Baumheiner	MBAUMHEFNER@NRDC.ORG	Natural Resources Defense Council	111 Sutter St 21st Fl San Francisco, CA 94104	Electronic Service	No	OFF_SL_20-745_Official
Carolyn	Berninger	cberninger@mncenter.org	Minnesota Center for Environmental Advocacy	26 E Exchange St Ste 206 Saint Paul, MN 55101	Electronic Service	No	OFF_SL_20-745_Official
James J.	Bertrand	james.bertrand@stinson.com	STINSON LLP	50 S 6th St Ste 2600 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-745_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Brenda A.	Bjorklund	brenda.bjorklund@centerpointenergy.com	CenterPoint Energy	505 Nicollet Mall Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-745_Official
James	Canaday	james.canaday@ag.state.mn.us	Office of the Attorney General-RUD	Suite 1400 445 Minnesota St. St. Paul, MN 55101	Electronic Service	No	OFF_SL_20-745_Official
Cody	Chilson	cchilson@greatermngas.com	Greater Minnesota Gas, Inc. & Greater MN Transmission, LLC	1900 Cardinal Ln PO Box 798 Faribault, MN 55021	Electronic Service	No	OFF_SL_20-745_Official
Ray	Choquette	rchoquette@agp.com	Ag Processing Inc.	12700 West Dodge Road PO Box 2047 Omaha, NE 68103-2047	Electronic Service	No	OFF_SL_20-745_Official
John	Coffman	john@johncoffman.net	AARP	871 Tuxedo Blvd.  St. Louis, MO 63119-2044	Electronic Service	No	OFF_SL_20-745_Official
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400  St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_20-745_Official
Riley	Conlin	riley.conlin@stoel.com	Stoel Rives LLP	33 S. 6th Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-745_Official
Brooke	Cooper	bcooper@alliete.com	Minnesota Power	30 W Superior St  Duluth, MN 55802191	Electronic Service	No	OFF_SL_20-745_Official
Grace	Corbin	G.Corbin@mpls-synod.org	Eco-Faith Network	122 W Franklin Ave Ste 600  Minneapolis, MN 55404	Electronic Service	No	OFF_SL_20-745_Official
Heidi	Corcoran	Heidi.Corcoran@CO.DAKOTA.MN.US	Dakota County	N/A	Electronic Service	No	OFF_SL_20-745_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Hillary	Creurer	hcreurer@allete.com	Minnesota Power	30 W Superior St Duluth, MN 55802	Electronic Service	No	OFF_SL_20-745_Official
George	Crocker	gwille@nawo.org	North American Water Office	PO Box 174 Lake Elmo, MN 55042	Electronic Service	No	OFF_SL_20-745_Official
Timothy	DenHerder Thomas	timothy@cooperativeenergyfutures.com	Cooperative Energy Futures	3500 Bloomington Ave. S Minneapolis, MN 55407	Electronic Service	No	OFF_SL_20-745_Official
Carrie	Desmond	carrie.desmond@metrotransit.org	Metropolitan Council	560 6th Avenue North Minneapolis, MN 55411	Electronic Service	No	OFF_SL_20-745_Official
Elizabeth	Dickinson	eadickinson@mindspring.com	Community Power	2720 E 22nd St Minneapolis, MN 55406	Electronic Service	No	OFF_SL_20-745_Official
Bridget	Dockter	Bridget.Dockter@xcelenergy.com		N/A	Electronic Service	No	OFF_SL_20-745_Official
Marie	Doyle	marie.doyle@centerpointenergy.com	CenterPoint Energy	505 Nicollet Mall P O Box 59038 Minneapolis, MN 554590038	Electronic Service	No	OFF_SL_20-745_Official
Michelle	Dreier	mdreier@electricalassociations.com		N/A	Electronic Service	No	OFF_SL_20-745_Official
Ron	Elwood	relwood@mnlisap.org	Mid-Minnesota Legal Aid	2324 University Ave Ste 101 Saint Paul, MN 55114	Electronic Service	No	OFF_SL_20-745_Official
James C.	Erickson	jericksonkbc@gmail.com	Kelly Bay Consulting	17 Quechee St Superior, WI 54880-4421	Electronic Service	No	OFF_SL_20-745_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
John	Farrell	jfarrell@lsr.org	Institute for Local Self-Reliance	2720 E. 22nd St Institute for Local Self-Reliance Minneapolis, MN 55406	Electronic Service	No	OFF_SL_20-745_Official
Eric	Fehlhaber	efe1haber@dakotaelectric.com	Dakota Electric Association	4300 220th St W Farmington, MN 55024	Electronic Service	No	OFF_SL_20-745_Official
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 55102198	Electronic Service	No	OFF_SL_20-745_Official
Daryll	Fuentes	energy@usg.com	USG Corporation	550 W Adams St Chicago, IL 60661	Electronic Service	No	OFF_SL_20-745_Official
James	Garness	james.r.garness@xcelenergy.com		N/A	Electronic Service	No	OFF_SL_20-745_Official
Edward	Garvey	edward.garvey@AESLconsulting.com	AESL Consulting	32 Lawton St Saint Paul, MN 55102-2617	Electronic Service	No	OFF_SL_20-745_Official
Bruce	Gerhardson	bgerhardson@otpc.com	Otter Tail Power Company	PO Box 496 215 S Cascade St Fergus Falls, MN 565380496	Electronic Service	No	OFF_SL_20-745_Official
Janet	Gonzalez	Janet.gonzalez@state.mn.us	Public Utilities Commission	Suite 350 121 7th Place East St. Paul, MN 55101	Electronic Service	No	OFF_SL_20-745_Official
Anita	Grace	anita@gracemulticultural.com	GRACE Multicultural	12959 196th LN NW Elk River, MN 55330	Electronic Service	No	OFF_SL_20-745_Official
Bill	Grant	billgrant@minncap.org	Minnesota Community Action Partnership	MCIIT Building 100 Empire Dr Ste 202 St. Paul, MN 55103	Electronic Service	No	OFF_SL_20-745_Official



First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Todd J.	Guerrero	todd.guerrero@kutakrock.com	Kutak Rock LLP	Suite 1750 220 South Sixth Street Minneapolis, MN 554021425	Electronic Service	No	OFF_SL_20-745_Official
Joe	Halso	joe.halso@sierraclub.org	Sierra Club	1536 Wynkoop St Ste 200 Denver, CO 80202	Electronic Service	No	OFF_SL_20-745_Official
Matthew B	Harris	matt.b.harris@xcelenergy.com	XCEL ENERGY	401 Nicollet Mall Fl 8 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_20-745_Official
Erik	Hallestad	erik@curenriver.org	Cure River	117 1st St Montevideo, MN 56265	Electronic Service	No	OFF_SL_20-745_Official
Kim	Havey	kim.havey@minneapolismn.gov	City of Minneapolis	350 South 5th Street, Suite 315M Minneapolis, MN 55415	Electronic Service	No	OFF_SL_20-745_Official
Adam	Heinen	ahainen@dakotaelectric.com	Dakota Electric Association	4300 220th St W Farmington, MN 55024	Electronic Service	No	OFF_SL_20-745_Official
Annete	Henkel	mu@mnuutilityinvestors.org	Minnesota Utility Investors	413 Wacouta Street #230 St.Paul, MN 55101	Electronic Service	No	OFF_SL_20-745_Official
Shane	Henriksen	shane.henriksen@enbridge.com	Enbridge Energy Company, Inc.	1409 Hammond Ave FL 2 Superior, WI 54880	Electronic Service	No	OFF_SL_20-745_Official
Corey	Hintz	chintz@dakotaelectric.com	Dakota Electric Association	4300 220th Street Farmington, MN 550249583	Electronic Service	No	OFF_SL_20-745_Official
Michael	Hoppe	lu23@bwe23.org	Local Union 23, I.B.E.W.	445 Etna Street Ste. 61 St. Paul, MN 55106	Electronic Service	No	OFF_SL_20-745_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
MJ	Horne	mj.horne@xcelenergy.com		N/A	Electronic Service	No	OFF_SL_20-745_Official
Samantha	Houston	shouston@ucusa.org	Union of Concerned Scientists	1825 K St. NW Ste 800 Washington, DC 20006	Electronic Service	No	OFF_SL_20-745_Official
Lori	Hoyum	lhoyum@mnpower.com	Minnesota Power	30 West Superior Street Duluth, MN 55802	Electronic Service	No	OFF_SL_20-745_Official
Holmes	Hummel	Holmes.Hummel@CleanEnergyWorks.org	Clean Energy Works	925 French St NW Washington, DC 20001	Electronic Service	No	OFF_SL_20-745_Official
Travis	Jacobson	travis.jacobson@mdu.com	Great Plains Natural Gas Company	400 N 4 h St Bismarck, ND 58501	Electronic Service	No	OFF_SL_20-745_Official
Alan	Jenkins	aj@jenkinsatlaw.com	Jenkins at Law	2950 Yellowtail Ave. Marathon, FL 33050	Electronic Service	No	OFF_SL_20-745_Official
Richard	Johnson	Rick.Johnson@lawmoss.com	Moss & Barnett	150 S. 5th Street Suite 1200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-745_Official
Sarah	Johnson Phillips	sarah.phillips@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-745_Official
Brendan	Jordan	bjordan@gpisd.org	Great Plains Institute & Bioeconomy Coalition of MN	2801 21st Ave S Ste 220 Minneapolis, MN 55407	Electronic Service	No	OFF_SL_20-745_Official
Stacey	Karels	skarels@local563.org	Mankato Area Bldg & Construction Trades Council	310 McKinzie St Mankato, MN 56001	Electronic Service	No	OFF_SL_20-745_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Mark J.	Kaufman	mkaufman@ibewlocal949.org	IBEW Local Union 949	12908 Nicollet Avenue South Burnsville, MN 55337	Electronic Service	No	OFF_SL_20-745_Official
Thomas	Koehler	TGK@IBEW160.org	Local Union #160, IBEW	2909 Anthony Ln St Anthony Village, MN 55418-3238	Electronic Service	No	OFF_SL_20-745_Official
Frank	Kohlasch	frank.kohlasch@state.mn.us	MN Pollution Control Agency	520 Lafayette Rd N. St. Paul, MN 55155	Electronic Service	No	OFF_SL_20-745_Official
Michael	Krikava	mkrikava@taflaw.com	Taft Stettinius & Hollister LLP	2200 IDS Center 80 S 8th St Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-745_Official
Nicolle	Kupser	nkupser@greatermngas.com	Greater Minnesota Gas, Inc. & Greater MN Transmission, LLC	1900 Cardinal Ln PO Box 798 Faribault, MN 55021	Electronic Service	No	OFF_SL_20-745_Official
Peder	Larson	plarson@larkinhoffman.com	Larkin Hoffman Daly & Lindgren, Ltd.	8300 Norman Center Drive Suite 1000 Bloomington, MN 55437	Electronic Service	No	OFF_SL_20-745_Official
James D.	Larson	james.larson@avantenergy.com	Avant Energy Services	220 S 6th St Ste 1300 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-745_Official
Amber	Lee	Amber.Lee@centerpointenergy.com	CenterPoint Energy	505 Nicollet Mall Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-745_Official
Annie	Levenson Falk	annief@cupminnesota.org	Citizens Utility Board of Minnesota	332 Minnesota Street, Suite W1360 St. Paul, MN 55101	Electronic Service	No	OFF_SL_20-745_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Ryan	Long	ryan.j.long@xcelenergy.com	Xcel Energy	414 Nicollet Mall 401 8th Floor Minneapolis, MN 55401	Electronic Service	No	OFF_SL_20-745_Official
Susan	Ludwig	sludwig@mnpower.com	Minnesota Power	30 West Superior Street  Duluth, MN 55802	Electronic Service	No	OFF_SL_20-745_Official
Kavita	Maini	kmairi@wi.rr.com	KM Energy Consulting, LLC	961 N Lost Woods Rd  Oconomowoc, WI 53066	Electronic Service	No	OFF_SL_20-745_Official
Pam	Marshall	pam@energycents.org	Energy CENTS Coalition	823 7 h St E  St. Paul, MN 55106	Electronic Service	No	OFF_SL_20-745_Official
Brian	Meloy	brian.meloy@stinson.com	STINSON LLP	50 S 6th St Ste 2600  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-745_Official
Joseph	Meyer	joseph.meyer@ag.state.mn.us	Office of the Attorney General-RUD	Bremer Tower, Suite 1400 445 Minnesota Street St Paul, MN 55101-2131	Electronic Service	No	OFF_SL_20-745_Official
Kevin	Miller	kevin.miller@chargepoint.com	ChargePoint, Inc.	254 E. Hacienda Avenue  Campbell, California 95008	Electronic Service	No	OFF_SL_20-745_Official
Stacy	Miller	stacy.miller@minneapolis.mn.gov	City of Minneapolis	350 S. 5th Street Room M.301 Minneapolis, MN 55415	Electronic Service	No	OFF_SL_20-745_Official
David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St  Duluth, MN 558022093	Electronic Service	No	OFF_SL_20-745_Official
Marc	Monbouquette	marc.monbouquette@enel.com	Enel X North America, Inc.	846 Bransten Rd  San Carlos, CA 94070	Electronic Service	No	OFF_SL_20-745_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP	33 South Sixth St Ste 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-745_Official
Mark	Nabong	mnabong@nrdc.org	Natural Resources Defense Council	20 N. Wacker Drive #1600 Chicago, IL 60606	Electronic Service	No	OFF_SL_20-745_Official
David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency	220 South Sixth Street Suite 1300 Minneapolis, Minnesota 55402	Electronic Service	No	OFF_SL_20-745_Official
Michael	Noble	noble@fresh-energy.org	Fresh Energy	408 Saint Peter St Ste 350 Saint Paul, MN 55102	Electronic Service	No	OFF_SL_20-745_Official
Samantha	Norris	saman.hanorris@alliantenergy.com	Interstate Power and Light Company	200 1st Street SE PO Box 351 Cedar Rapids, IA 524060351	Electronic Service	No	OFF_SL_20-745_Official
Nate	O'Reilly	nate@iron512.com	Ironworkers Local #512	851 Pierce Butler Route St Paul, MN 55104	Electronic Service	No	OFF_SL_20-745_Official
Matthew	Olsen	molsen@otpc.com	Otter Tail Power Company	215 South Cascade Street Fergus Falls, MN 56537	Electronic Service	No	OFF_SL_20-745_Official
Debra	Opatz	dopatz@otpc.com	Otter Tail Power Company	215 South Cascade Street Fergus Falls, MN 56537	Electronic Service	No	OFF_SL_20-745_Official
Carol A.	Overland	overland@legalelectric.org	Legalelectric - Overland Law Office	1110 West Avenue Red Wing, MN 55066	Electronic Service	No	OFF_SL_20-745_Official
John	Pacheco	johnpachecojr@gmail.com		N/A	Electronic Service	No	OFF_SL_20-745_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Greg	Palmer	gpalmer@greatermngas.com	Greater Minnesota Gas, Inc. & Greater MN Transmission, LLC	1900 Cardinal Ln PO Box 798 Fairbault, MN 55021	Electronic Service	No	OFF_SL_20-745_Official
Ben	Passer	Passer@fresh-energy.org	Fresh Energy	408 St. Peter Street Ste 220  Saint Paul, MN 55102	Electronic Service	No	OFF_SL_20-745_Official
Jose	Perez	jose@hispanicsinenergy.com		1017 L Street #719  Sacramento, CA 95814	Electronic Service	No	OFF_SL_20-745_Official
Jennifer	Peterson	jjpeterson@mnpower.com	Minnesota Power	30 West Superior Street  Duluth, MN 55802	Electronic Service	No	OFF_SL_20-745_Official
Catherine	Phillips	Catherine.Phillips@wecenergygroup.com	Minnesota Energy Resources	231 West Michigan St  Milwaukee, WI 53203	Electronic Service	No	OFF_SL_20-745_Official
Marcia	Podratz	mpodratz@mnpower.com	Minnesota Power	30 W Superior S  Duluth, MN 55802	Electronic Service	No	OFF_SL_20-745_Official
Kevin	Pranis	kpranis@lunagroc.com	Laborers' District Council of MN and ND	81 E Little Canada Road  St. Paul, Minnesota 55117	Electronic Service	No	OFF_SL_20-745_Official
David G.	Prazak	dprazak@otpc.com	Otter Tail Power Company	P.O. Box 496 215 South Cascade Street Fergus Falls, MN 565380496	Electronic Service	No	OFF_SL_20-745_Official
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 55102131	Electronic Service	Yes	OFF_SL_20-745_Official
Kevin	Reuther	kreuther@mncenter.org	MN Center for Environmental Advocacy	26 E Exchange St, Ste 206  St. Paul, MN 551011667	Electronic Service	No	OFF_SL_20-745_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Susan	Romans	sromans@allete.com	Minnesota Power	30 West Superior Street Legal Dept Duluth, MN 55802	Electronic Service	No	OFF_SL_20-745_Official
Richard	Savelkoul	rsavelkoul@martinsquires.com	Martin & Squires, P.A.	332 Minnesota Street Ste W2750  St. Paul, MN 55101	Electronic Service	No	OFF_SL_20-745_Official
Tim	Schaefer	thschaef@gmail.com	Environment MN	211 N 1st St Ste 480  Minneapolis, MN 55401	Electronic Service	No	OFF_SL_20-745_Official
Thomas	Scharff	thomas.scharff@versoco.com	Verso Corp	600 High Street  Wisconsin Rapids, WI 54495	Electronic Service	No	OFF_SL_20-745_Official
Larry L.	Schedin	Larry@LLSResources.com	LLS Resources, LLC	332 Minnesota St, Ste W1390  St. Paul, MN 55101	Electronic Service	No	OFF_SL_20-745_Official
Elizabeth	Schmiesing	eschmiesing@winthrop.com	Winthrop & Weinstine, P.A.	225 South Sixth Street Suite 3500 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-745_Official
Kevin	Schwain	Kevin.D.Schwain@xcelenergy.com	Xcel Energy	404 Nicollet Mall  Minneapolis, MN 55401	Electronic Service	No	OFF_SL_20-745_Official
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th Pl E Ste 350  Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_20-745_Official
Timothy	Sexton	Timothy.Sexton@state.mn.us	Minnesota Department of Transportation	395 John Ireland Blvd  St. Paul, MN 55155-1899	Electronic Service	No	OFF_SL_20-745_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates	7400 Lyndale Ave S Ste 190 Richfield, MN 55423	Electronic Service	No	OFF_SL_20-745_Official
Colleen	Sipiorski	Colleen.Sipiorski@wecenergygroup.com	Minnesota Energy Resources Corporation	700 North Adams St Green Bay, WI 54307	Electronic Service	No	OFF_SL_20-745_Official
Anne	Smart	anne.smart@chargepoint.com	ChargePoint, Inc.	254 E Hacienda Ave Campbell, CA 95008	Electronic Service	No	OFF_SL_20-745_Official
Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.	76 W Kellogg Blvd St. Paul, MN 55102	Electronic Service	No	OFF_SL_20-745_Official
Peggy	Sorum	peggy.sorum@centerpointenergy.com	CenterPoint Energy	505 Nicollet Mall Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-745_Official
Jamez	Staples	jstaples@renewablepartners.com	Renewable Energy Partners	3033 Excelsior Blvd S Minneapolis, MN 55416	Electronic Service	No	OFF_SL_20-745_Official
Byron E.	Starns	byron.starns@stinson.com	STINSON LLP	50 S 6th St Ste 2600 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-745_Official
Richard	Stasik	richard.stasik@wecenergygroup.com	Minnesota Energy Resources Corporation (HOLDING)	231 West Michigan St - P321 Milwaukee, WI 53203	Electronic Service	No	OFF_SL_20-745_Official
Kristin	Stastny	kstastny@taftlaw.com	Taft Stettinius & Hollister LLP	2200 IDS Center 80 South 8th St Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-745_Official



First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Cary	Stephenson	cStephenson@otpco.com	Otter Tail Power Company	215 South Cascade Street Fergus Falls, MN 56537	Electronic Service	No	OFF_SL_20-745_Official
James M	Strommen	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered	150 S 5th St Ste 700 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-745_Official
Eric	Swanson	eswanson@winthrop.com	Winthrop & Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_20-745_Official
Lynnette	Sweet	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	Yes	OFF_SL_20-745_Official
Dean	Taylor	dtaylor@pluginamerica.org	Plug In America	6380 Wilshire Blvd, Suite 1000 Los Angeles, CA 90048	Electronic Service	No	OFF_SL_20-745_Official
Stuart	Tommerdahl	stommerdahl@otpco.com	Otter Tail Power Company	215 S Cascade St PO Box 496 Fergus Falls, MN 56537	Electronic Service	No	OFF_SL_20-745_Official
Karen	Turnboom	karen.turnboom@versoco.com	Verso Corporation	100 Central Avenue Duluth, MN 55807	Electronic Service	No	OFF_SL_20-745_Official
Andrew	Twite	twite@fresh-energy.org	Fresh Energy	408 St. Peter Street, Ste. 220 St. Paul, MN 55102	Electronic Service	No	OFF_SL_20-745_Official
Thomas	Tynes	jjazynka@energyfreedomcoalition.com	Energy Freedom Coalition of America	101 Constitution Ave NW Ste 525 East Washington, DC 20001	Electronic Service	No	OFF_SL_20-745_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Analeisha	Vang	avang@mpower.com	Minnesota Power	30 W Superior St Duluth, MN 558022093	Electronic Service	No	OFF_SL_20-745_Official
Lisa	Veith	lisa.veith@ci.stpaul.mn.us	City of St. Paul	400 City Hall and Courthouse 15 West Kellogg Blvd. St. Paul, MN 55102	Electronic Service	No	OFF_SL_20-745_Official
Dwight	Wagenius	dwagenius@gmail.com	Minnesota Interfaith Power & Light	4407 E Lake St Minneapolis, MN 55406	Electronic Service	No	OFF_SL_20-745_Official
Francesca	Wahl	fwahl@tesla.com	Tesla	3500 Deer Creek Rd Palo Alto, CA 94304	Electronic Service	No	OFF_SL_20-745_Official
Darrell	Washington	darrell.washington@state.mn.us	DOT	N/A	Electronic Service	No	OFF_SL_20-745_Official
Samantha	Williams	swilliams@nrdc.org	Natural Resources Defense Council	20 N. Wacker Drive Suite 1600 Chicago, IL 60606	Electronic Service	No	OFF_SL_20-745_Official
Justin	Wilson	justin.wilson@chargepoint.com	ChargePoint	240 East Hacienda Ave. Campbell, CA 95008	Electronic Service	No	OFF_SL_20-745_Official
Joseph	Windler	jwindler@winthrop.com	Winthrop & Weinstine	225 South Sixth Street, Suite 3500 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-745_Official
Patrick	Zomer	Pat.Zomer@lawmoss.com	Moss & Barnett a Professional Association	150 S. 5th Street, #1200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-745_Official