

December 31, 2025

Sasha Bergman
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, Minnesota 55101-2147

RE: Comments of the Minnesota Department of Commerce
Docket No. E002/M-25-370

Dear Ms. Bergman:

Attached are the comments of the Minnesota Department of Commerce (Department) in the following matter:

*THE PETITION OF NORTHERN STATES POWER COMPANY FOR APPROVAL
OF THE 2025 RENEWABLE DEVELOPMENT FUND ANNUAL REPORT,
TRACKER ACCOUNT TRUE-UP, AND 2026 RATE RIDER FACTOR.*

The Petition was filed by Northern States Power Company (Xcel or the Company) on October 1, 2025, and the Errata Petition was filed on December 3, 2025.

The Department recommends the Minnesota Public Utilities Commission (Commission) **approve** Xcel's Errata Petition and is available to answer any questions the Commission may have.

Sincerely,

/s/ Dr. SYDNIE LIEB
Assistant Commissioner of Regulatory Analysis

LB/CA/ad



Before the Minnesota Public Utilities Commission

Comments of the Minnesota Department of Commerce

Docket No. E002/M-25-370

I. INTRODUCTION

The Department provides the following comments on Northern States Power Company d/b/a Xcel Energy's (Xcel Energy or the Company) errata petition (Errata Petition) requesting approval from the Minnesota Public Utilities Commission (Commission) for its proposed 2026 Renewable Development Fund (RDF) rider rate.¹ As described in greater detail below, the RDF rider is a special rate through which Xcel Energy recovers costs associated with its statutory obligation to transfer funds into the renewable development account in the state treasury based on the number of dry casks containing spent fuel at its Monticello and Prairie Island nuclear generating facilities. The Company also funds its legislatively mandated Solar*Rewards and Solar*Rewards for Schools programs via deductions to its cask-related obligations.

II. PROCEDURAL BACKGROUND

October 1, 2025	Xcel filed Petition for approval of its 2025 RDF annual report, tracker account, and proposed 2026 RDF rate rider factor.
December 3, 2025	Xcel filed an Errata Petition for approval of its 2025 RDF annual report, tracker account, and proposed 2026 RDF rate rider factor.

III. DEPARTMENT ANALYSIS

A. BACKGROUND ON THE RENEWABLE DEVELOPMENT FUND

In 1994, the Minnesota Legislature established the RDF under Minn. Stat. § 116C.779. The statute requires Xcel Energy, as the public utility that owns the Prairie Island and Monticello nuclear power plants, to transfer funds (in dollar amounts determined by the number of dry casks containing spent fuel at each facility), into an account that is used to support the development of various innovative energy projects, such as renewable electric energy technologies.

Prior to 2017, Xcel Energy administered the account, then referred to as the Renewable Development Fund (RDF). The Company tracked its cask-determined funding obligation annually but only recovered from ratepayers' costs for actual expenses incurred for Commission-approved projects. In 2017, Minn. Stat. § 116C.779 was amended to establish the renewable development account (now referred to as

¹ December 3, 2025 Errata Petition at 1.

the Renewable Development Account, or RDA) as a separate account in the special revenue fund in the state treasury, administered by the Commissioner of Minnesota Management and Budget (MMB). The amended statute requires Xcel Energy to transfer its cask-related funding obligation into the RDA every year, regardless of whether the funds are needed for approved energy projects. Only one project approved prior to 2017 and funded out of the legacy RDF remains active.²

As discussed in greater detail below, Xcel Energy also recovers costs for certain other programs as permitted by statute via the RDF Rider, such as its Solar*Rewards Program and its Solar*Rewards for Schools Program.

The Company recovers expenditures associated with the RDF/RDA through its Resource Adjustment charge to customers. Xcel Energy true up RDF/RDA expenditures and rider revenues annually and tracks the remainder of obligated funds as unencumbered or as deferred payments not yet collected from ratepayers. The Company adjusts the rider rate annually, based on the RDF/RDA true ups, actual expenditures, and forecasted expenditures.

A detailed docket history of Xcel Energy’s RDF rider is included with these comments as Attachment 1.

B. XCEL’S REQUESTED COST RECOVERY AND PROPOSED 2026 RDF RIDER RATE

Xcel proposes a new RDF rider rate of \$0.001371 per kWh, an increase compared to the currently approved RDF rider rate of \$0.001097 per kWh.³ The Company calculated its proposed RDF rider rate based on the RDF/RDA tracker account true up and a set of actual and forecasted expenditures associated with RDF-funded grant projects and statutorily required payments. Specifically, Xcel proposes to recover the following amounts through its 2026 RDF rider:

Table 1: Xcel Energy’s Proposed 2026 RDF Rider Cost Recovery⁴

Cost Recovery Component	Amount
Transfers to Program Accounts in the Special Revenue Fund	\$ 30,116,589
Solar Energy Incentive Program (Solar*Rewards), Minn Stat § 116C7792	\$ 9,337,575
Solar for Schools, Minn. State § 216C376	\$ 96,272
Legacy RDF Projects	
Energy Production Grant Projects	\$ 1,016,024
Research and Development Grant Projects	\$ -
True-up for Prior Under collection/Overcollection)	\$ (838,100)
Total Requested Cost Recovery	\$ 39,728,360
Forecasted 2025 kWh Sales	28,985,927,495
2026 Proposed MN RDF Rider Factor	\$ 0.001371

² Errata Petition, Attachment 11.

³ Errata Petition at 3.

⁴ Errata Petition at 2-3.

As shown, the combined transfers to the RDA (for the Company’s cask-related funding obligation and Solar for School’s program account) represent the single largest component of the Company’s proposed 2025 RDF/RDA rider recovery, followed by costs related to the Company’s Solar*Rewards program. Xcel Energy expects to incur costs of \$1,016,024 pursuant to the last active legacy RDF-funded project in 2026. The Company’s proposal also includes the refund of \$838,100 overcollection from prior years.

B.1. Transfers to Program Accounts in the Special Revenue Fund

Table 2 summarizes the calculation of Xcel Energy’s required transfers to program accounts in the special revenue fund for 2026:

Table 2
Derivation of 2026 Transfer⁵

Component	Amount
<i>Transfer to RDA Program Account</i>	
Cask Obligation:	
Prairie Island Casks (65 casks x \$500,000 per cask)	\$32,500,000
Monticello Casks (30 casks x \$350,000)	\$10,500,000
Gross Cask Obligation	\$43,000,000
Statutory Reduction Minn. Stat. § 116C.779 subd. 1(c)	-\$3,750,000
Net Cask Obligation	\$39,250,000
Other Additions/(Deductions):	
Solar* Rewards	-\$9,337,576
Transfer to RDA Program Account	\$29,912,424
Transfer to Solar for Schools Program Account	\$204,165
Total Transfers to Program Accounts in Special Revenue Fund	\$30,116,589

The Department briefly reviews the components of the transfer calculations below.

B.1.1. Cask Obligation

Minn. Stat. § 116C.779, subd. 1(c) and (d) obligate the Company to pay \$500,000 for each dry cask at its Prairie Island nuclear power plant and \$350,000 for each dry cask at its Monticello plant. In its August 8, 2025, Annual Nuclear Waste Management Report, Xcel Energy reported that as of August 8, 2025, it had 55 casks in place at Prairie Island, and 30 casks at Monticello.⁶ Per Attachment 19 of its

⁵ Errata Petition at Attachment 19 at 1.

⁶ Docket No. E002/PR-09-36 (eDockets) [0258-221899-01](#).

Errata Petition, the Company expects to place an additional ten casks into service at Prairie Island during 2026, resulting in a gross cask obligation of \$43.0 million for 2026.

Minn. Stat. § 116C.779, subd. 1(e) (2023) requires a \$3.75 million reduction to the amount transferred to the RDA annually, resulting in a net cask obligation of \$39.25 million.

*B.1.2. Solar*Rewards*

Minn. Stat. § 116C.779, subd. 1(e) requires Xcel Energy to deduct from its annual transfer to the RDA the funds necessary to pay for its obligations related to its Solar*Rewards program, established pursuant to Minn. Stat. § 116C.7792. The Company forecasts Solar*Rewards costs of approximately \$9.3 million in 2026.⁷

B.1.3. Solar for Schools

In 2021, Minn. Stat. § 216C.376 required Xcel Energy to establish a program to provide financial assistance to enable schools to install and operate solar energy systems, and to withhold \$8 million from its annual transfer to the RDA to fund the program. In response, in May 2022, the Company launched its Solar*Rewards for Schools Program and began accepting applications for funds from interested schools.

In 2023, new Minnesota legislation repealed Minn. Stat. § 216C.376,⁸ and the Company closed its plan to new applicants but will continue to process and administer projects that had already been allocated funding at the time of the repeal.⁹

Along with the repeal of Minn. Stat. § 216C.376, other new legislation in 2023:

- established a new solar for schools' program in the Department of Commerce;¹⁰
- created a solar for schools' program account in the special revenue fund;¹¹ and
- required Xcel Energy to transfer the unencumbered portion of the initial \$8 million allocation required by Minn. Stat. § 216C.376 to the new solar for schools' program account.¹²

In prior years, the Company had estimated that \$2.7 million of the original \$8 million allocation was encumbered for its approved projects and returned the unencumbered \$5.3 million to MMB.¹³ In this Errata Petition, the Company lowered its estimate of encumbered funds by \$0.2 million and is

⁷ Minn. Stat. § 116C.779 authorizes Xcel Energy to deduct other costs from the required transfer, but the Company has no other such deductions for 2026.

⁸ 2023 Minn. Laws Ch.60, art.12, § 78.

⁹ Errata Petition at 8. The Company's plan to close its plan to new applicants was approved in Department's August 23, 2023, in Decision in Docket No. E002/M-13-1015.

¹⁰ Minn. Stat. § 216C.37, subd. 2 (2023).

¹¹ Minn. Stat. § 216C.37, subd. 2 (2023).

¹² 2023 Minn. Laws Ch. 60, art. 12, § 69.

¹³ Errata Petition at 9-10.

proposing to include that amount in its next MMB transfer and recover it from ratepayers in 2026. The encumbered \$2.5 million will be collected from ratepayers over time as the Xcel Energy makes payments to participating schools.

B.1.4. Prior Year True-Up

The Company's cask obligation is based on a forecast of the number of casks in place at each of its nuclear facilities. Occasionally that forecast is incorrect, and Xcel Energy includes a true-up adjustment the following year to correct the difference. At the time Xcel Energy developed its 2025 transfer amount to the RDA, the Company estimated it would have 55 and 30 casks in place at the Prairie Island and Monticello facilities, respectively. Those forecasts were correct, so no true-up adjustment is necessary this year.

B.1.5. Net Transfer to Program Accounts in the Special Revenue Fund

The Department has reviewed the calculation for Xcel's proposed net transfer amount of \$30,116,589, and the various estimates included in it, and concludes that they are reasonable. Consistent with the December 21, 2018, Order in Docket No. E002/M- 18-628, the Department recommends the Commission require the Company, within 10 days of making the required 2026 transfer payments to the program accounts in the special revenue fund, to file a letter in the instant docket notifying the Commission of the transfer.

B.2. Solar Energy Incentive Program

Minn. Stat. § 116C.7792 (2023) establishes the Solar Energy Incentive Program (or Solar*Rewards Program), the purpose of which is to provide monetary incentives for solar energy production of systems with no more than 40 kilowatts of aggregate nameplate capacity per premises.¹⁴ As noted above, this incentive program is funded by money withheld from the RDA transfer, and is limited in total cost by dollar amounts established in statute. Per statute, any funds allocated to this incentive program that remain unspent (or unencumbered) on January 1, 2028, must be transferred to the RDA.

Xcel Energy forecasted incentive payments of approximately \$9.3 million for its Solar*Rewards program in 2026. Any variances from this forecast will be trued up in future RDF/RDA rider proceedings. Therefore, the Department concludes that Xcel Energy's request to recover this amount from ratepayers (and deduct it from the required RDA transfer, as described above) is reasonable.

B.3. Solar for Schools Program

As noted above, in 2021, Minn. Stat. § 216C.376 established the Solar for Schools Program to provide incentive payments over a period of 10 years to schools that install and operate qualifying solar energy systems. Consistent with the statute, Xcel Energy withheld \$8.0 million from its required RDA transfer

¹⁴ Xcel Energy's Solar* Rewards Program was approved by the Department of Commerce Docket No. E,G002/CIP-13-1015.

in 2022 and planned to recover program costs from ratepayers as they were incurred on a going forward basis.¹⁵

Also as noted above, Xcel Energy closed its Solar*Rewards for Schools Program in 2023 to new applications pursuant to the repeal of Minn. Stat. § 216C.376 but will continue to administer the program for projects that had allocated incentives prior to the repeal. The Company had 10 such applications, but two were withdrawn with Permission to Operate (PTO) leaving eight remaining applications for which it has allocated a total of \$2.5 million for the life of the program.¹⁶ Of that \$2.5 million, Xcel Energy expects to pay out \$95,272 in 2026 and requested recovery of that amount in its Errata Petition.

The Department reviewed Xcel Energy's forecast of costs for its Solar*Rewards for Schools program, included in Attachment 18 to the Company's Errata Petition, and concludes that it is reasonable. The Department also notes that any variances from projected 2026 costs will be trued up in future RDF riders. Based on this, the Department concludes that Xcel's Energy's request is reasonable.

B.4. Legacy RDF Projects

Minn. Stat. § 216B.1645, subd. 2, allows Xcel to recover from ratepayers its expenditures made pursuant to Minn. Stat. § 116C.779, to the extent the expenditures have received Commission approval and are not offset by associated revenues.

As shown in Table 1 to the Company's Errata Petition, one legacy RDF project remains active. Accordingly, Xcel Energy requests that an additional \$1,016,024 be included in its 2026 recoverable costs.

B.5. Tracker Balance

Xcel Energy's tracker calculations indicate an expected net over collection of \$838,100 at the end of 2025, which the Company proposed to refund to ratepayers during 2026.¹⁷ The Department reviewed the Company's calculations and concluded that they are reasonable. Like other costs recovered through the RDF rider, as actual data becomes available, any variance between the forecasted and actual revenue will be trued up in future RDF rider filings.

B.6. Proposed Rider Rate

The Company's proposed RDF rider rate of \$0.001371 per kWh equals its total requested cost recovery of \$39,728,361 divided by the 2026 forecasted Minnesota kWh sales.¹⁸ The Company stated under its proposal, the average residential customer will pay \$1.03 per month for RDF costs.¹⁹ Again, any

¹⁵ Docket No. E002/M-21-708 at 11.

¹⁶ Errata Petition at 9.

¹⁷ Errata Petition at 3.

¹⁸ Errata Petition Attachment 3.

¹⁹ Errata Petition at 1.

variances in actual costs and/or actual sales versus budgeted costs and sales will be trued up in future rider proceedings.

C. ADMINISTRATIVE EXPENSES CAP AND EXCLUSION

Prior to 2018, Xcel recovered administrative expenses associated with projects approved under its RDF program.²⁰ However, in consideration of the 2017 legislative changes impacting the RDF, the Commission disallowed Xcel's recovery of RDF/RDA program administrative expenses and directed the Company to remove the administrative costs from the tracker account balance in 2018.²¹ As a result, Xcel is not requesting recovery of administrative expenses in the current docket.²²

D. SOLAR ENERGY STANDARD EXEMPTION FOR CERTAIN CUSTOMERS

Minn. Stat. § 216B.1691, subd. 2f(f) exempts certain iron mining, paper milling, and wood product manufacturing/processing customers from paying for the costs utilities incur to satisfy Minnesota's Solar Energy Standard (SES). Since the RDF/RDA funds certain solar programs and projects Xcel uses towards satisfying the SES requirements, the Company must either exclude its statutorily SES-exempt customers from SES-related solar cost recovery in the RDF/RDA rider or refund the SES-related solar costs collected from those customers. Xcel recovers any such refunds from other ratepayers through subsequent RDF rider cost recovery. The Company explained it used the process for calculating, excluding, and recovering the SES-related costs in the RDF/RDA rider approved in the Commission's January 1, 2018, Order in Docket No. E-002/M-17-425. In March 2024, three SES-exempt customers received credits totaling \$72,583. The Department concludes Xcel treated the SES-exempt customers and the associated SES costs in a manner consistent with Commission order.

E. COMPLIANCE WITH FILING REQUIREMENTS

Point 5 of the Commission's June 28, 2005, Order in Docket No. E002/M-05-109 directs Xcel to include as part of its annual RDF rider filing certain reporting requirements for RDF-funded projects, as originally specified in the Commission's December 23, 2002, Order in Docket No. E002/M-00-1583. The Department concludes Xcel complied with the reporting requirements by providing the following information in its Errata Petition, in Table 6 and Attachments 5, 6, 9, 11, and 13:

- Total dollars awarded from the fund for the project
- A schedule of anticipated payments
- The amount disbursed
- The amounts recovered in the fuel clause
- The amounts remaining to be recovered

²⁰ *In the Matter of Northern States Power Company's Renewable Development Fund Annual Report, Tracker Account True-Up, and Request for 2022 Ride Factor*, Department Comments, November 19, 2021, Docket No. E002/M-21-708 (eDockets: [202111-18000-01](#)), at page 9.

²¹ *In the Matter of Northern States Power Company's Renewable Development Fund Annual Report, Tracker Account True-Up, and Request for 2022 Ride Factor*, PUC Order, September 52, 2018, Docket No. E002/M-17-712 (eDockets: [201810-147024-01](#)).

²² Errata Petition at 11.

- Any adjustments to these amounts due to, for example, penalties or incentive payments provided for the terms of the proposal
- Any disparities between the schedule of anticipated payments and actual payments.

Point 8 of the Commission's March 17, 2011, Order in Docket No. E002/M-10-1054 requires Xcel to report certain figures associated with the RDA/RDF rider. The Department concludes the Company complied with point 8 of this Order by providing the following information in Errata Petition Table 6:

- Total liability incurred under Minn. Stat. § 116C.779 (\$563,700,000)
- Aggregate payments for approved renewable development projects and legislative mandates (\$521,944,247)
- Total amount recovered through the fuel clause adjustment mechanism (\$12,202,440) and RDF rate rider (\$503,866,733) for RDF costs
- Unencumbered cumulative balance (\$38,846,111)

The Commission's September 25, 2018, Order in Docket No. E002/M-17-712 requires Xcel to separately categorize RDA (the annual statutorily required payment to the RDA) and RDF (payments to other legislative mandates and legacy RDF-funded grant projects) expenditures in future RDF rider filings. Xcel separately identified its payments to the MMB-administered RDA and other RDF-related expenditures in Errata Petition Table 1 and Errata Petition Attachments 1 through 3, and, therefore, the Department concludes Xcel complied with this reporting requirement.

The Department recommends the Commission accept the compliance reporting portions of Xcel's Errata Petition.

F. CUSTOMER NOTIFICATION AND BILLING

Xcel's RDF rider rate is incorporated into the Resource Adjustment line, rather than separately identified, on customer bills. In the first billing month the new RDF rider rate is effective, the Company proposes to include the following notice on customer bills²³:

Renewable energy development costs are included as part of the Resource Adjustment line on your bill. It represents money to support research and development of renewable energy projects and renewable energy technologies. Beginning this month, the renewable energy development costs have increased from \$0.001097 per kWh to \$0.001371 per kWh. Visit xcelenergy.com/rdf to find more on Xcel Energy's renewable energy development programs.

The Department supports the Company's proposed language, as it is similar to that used for previous RDF rider rate notices, and its stated intention to work with the Commission's Consumer Affairs Office to finalize the notice wording and update the notice with the approved 2026 RDF rider rate.

²³ Errata Petition at 15.

IV. DEPARTMENT RECOMMENDATIONS

Based on analysis of the Department and the information in the record, the Department has prepared recommendations, which are provided below. The recommendations correspond to the subheadings of Section III above.

B. XCEL'S REQUESTED COST RECOVERY AND PROPOSED 2026 RDF RIDER RATE

- B.1.5. Require the Company, within 10 days of making the required 2026 transfer payments to the program accounts in the special revenue fund, to file a letter in the current docket notifying the Commission of the transfer.
- B.6. Approve Xcel's proposed 2026 RDF/RDA rider rate of \$.001371/kWh, effective January 1, 2026, or in the first billing month after issuance of the Commission's Order in this matter, whichever is later.

E. COMPLIANCE WITH FILING REQUIREMENTS

- Accept the compliance reporting portions of Xcel Energy's Errata Petition.

CERTIFICATE OF SERVICE

I, Nicole Westling, hereby certify that I have this day, served copies of the following document on the attached list of persons by electronic filing, certified mail, e-mail, or by depositing a true and correct copy thereof properly enveloped with postage paid in the United States Mail at St. Paul, Minnesota.

**Minnesota Department of Commerce
Comments**

Docket No. E002/M-25-370

Dated this **31st** day of **December 2025**

/s/Nicole Westling

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
1	Sasha	Bergman	sasha.bergman@state.mn.us		Public Utilities Commission	121 7th Pl E Ste 350 St. Paul MN, 55101 United States	Electronic Service		Yes	M-25-370
2	Matthew	Brodin	mbrodin@allete.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	M-25-370
3	Mike	Bull	mike.bull@state.mn.us		Public Utilities Commission	121 7th Place East, Suite 350 St. Paul MN, 55101 United States	Electronic Service		Yes	M-25-370
4	John	Coffman	john@johncoffman.net	AARP		871 Tuxedo Blvd. St, Louis MO, 63119-2044 United States	Electronic Service		No	M-25-370
5	Generic	Commerce Attorneys	commerce.attorneys@ag.state.mn.us		Office of the Attorney General - Department of Commerce	445 Minnesota Street Suite 1400 St. Paul MN, 55101 United States	Electronic Service		Yes	M-25-370
6	George	Crocker	gwillc@nawo.org	North American Water Office		5093 Keats Avenue Lake Elmo MN, 55042 United States	Electronic Service		No	M-25-370
7	James	Denniston	james.r.denniston@xcelenergy.com	Xcel Energy Services, Inc.		414 Nicollet Mall, 401-8 Minneapolis MN, 55401 United States	Electronic Service		Yes	M-25-370
8	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	M-25-370
9	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	M-25-370
10	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	M-25-370
11	Adam	Heinen	aheinen@dakotaelectric.com	Dakota Electric Association		4300 220th St W Farmington MN, 55024 United States	Electronic Service		No	M-25-370

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
12	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	M-25-370
13	Alan	Jenkins	aj@jenkinsatlaw.com	Jenkins at Law		2950 Yellowtail Ave. Marathon FL, 33050 United States	Electronic Service		No	M-25-370
14	Richard	Johnson	rick.johnson@lawmoss.com	Moss & Barnett		150 S. 5th Street Suite 1200 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-370
15	Sarah	Johnson Phillips	sjphillips@stoel.com	Stoel Rives LLP		33 South Sixth Street Suite 4200 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-370
16	Peder	Larson	plarson@larkinhoffman.com	Larkin Hoffman Daly & Lindgren, Ltd.		8300 Norman Center Drive Suite 1000 Bloomington MN, 55437 United States	Electronic Service		No	M-25-370
17	Kavita	Maini	kmaini@wi.rr.com	KM Energy Consulting, LLC		961 N Lost Woods Rd Oconomowoc WI, 53066 United States	Electronic Service		No	M-25-370
18	Christine	Marquis	regulatory.records@xcelenergy.com	Xcel Energy		414 Nicollet Mall MN1180-07-MCA Minneapolis MN, 55401 United States	Electronic Service		Yes	M-25-370
19	Stacy	Miller	stacy.miller@minneapolismn.gov	City of Minneapolis		350 S. 5th Street Room M 301 Minneapolis MN, 55415 United States	Electronic Service		No	M-25-370
20	David	Moeller	dmoeller@allete.com	Minnesota Power			Electronic Service		No	M-25-370
21	Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP		33 South Sixth St Ste 4200 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-370
22	David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency		220 South Sixth Street Suite 1300 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-370

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
23	Carol A.	Overland	overland@legalelectric.org	Legalelectric - Overland Law Office		1110 West Avenue Red Wing MN, 55066 United States	Electronic Service		No	M-25-370
24	Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	1400 BRM Tower 445 Minnesota St St. Paul MN, 55101-2131 United States	Electronic Service		Yes	M-25-370
25	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	M-25-370
26	Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.		76 W Kellogg Blvd St. Paul MN, 55102 United States	Electronic Service		No	M-25-370
27	Byron E.	Starns	byron.starns@stinson.com	STINSON LLP		50 S 6th St Ste 2600 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-370
28	Carla	Vita	carla.vita@state.mn.us	MN DEED		Great Northern Building 12th Floor 180 East Fifth Street St. Paul MN, 55101 United States	Electronic Service		No	M-25-370
29	Joseph	Windler	jwindler@winthrop.com	Winthrop & Weinstine		225 South Sixth Street, Suite 3500 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-370
30	Kurt	Zimmerman	kwz@ibew160.org	Local Union #160, IBEW		2909 Anthony Ln St Anthony Village MN, 55418-3238 United States	Electronic Service		No	M-25-370
31	Patrick	Zomer	pat.zomer@lawmoss.com	Moss & Barnett PA		150 S 5th St #1200 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-370