

May 15, 2026

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

RE: Response Comments of the Minnesota Department of Commerce  
Docket No. E002/AA-24-63

Dear Ms. Bergman,

Attached are the Response Comments of the Minnesota Department of Commerce, Division of Energy Resources (Department) regarding the February 27, 2026 Petition with March 4, 2026 Errata by Northern States Power Company, doing business as Xcel Energy (Xcel or the Company) in Docket No. E002/AA-24-63, requesting a true-up of Xcel's 2025 fuel clause adjustment (FCA) charges. The Department responds to Xcel's Reply Comments, filed on May 1, 2026.

The Department continues to recommend that the Minnesota Public Utilities Commission (Commission) approve Xcel's 2025 FCA true-up petition with modifications discussed in the attached Response Comments. Specifically, the Department recommends that the Commission require additional reporting regarding Prairie Island vendor credits; reserve the determination of prudence and recovery of Riverside-related replacement power costs and refer the Riverside issue to a contested case so that the record can be developed; and require clearer transmission loss reporting in future FCA filings. The Department is available to answer any questions the Commission may have in this matter.

Sincerely,

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

CN, AG/ad  
Attachment



**Before the Minnesota Public Utilities Commission**  
**Response Comments of the Minnesota Department of Commerce**

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Docket No. E002/AA-24-63

**I. INTRODUCTION**

On February 27, 2026, Northern States Power Company, doing business as Xcel Energy (Xcel or the Company) filed its 2025 true-up Petition (Petition) in the current docket requesting the Minnesota Public Utilities Commission (Commission) authorize Xcel to implement true-up factors by class for the Company's Fuel Clause Adjustment (FCA).<sup>1</sup> On March 4, 2026, Xcel filed Errata stating that it had inadvertently omitted Part B, Attachment 16 from its initial filing and submitted that attachment with the errata. The added attachment addresses congestion and curtailment strategies compliance.<sup>2</sup>

On April 15, 2026, the Minnesota Department of Commerce (Department) filed Initial Comments reviewing Xcel's petition. The Department recommended that the Commission approve Xcel's 2025 FCA true-up Petition with certain modifications and requests for clarification. The Department's Comments addressed, among other issues, Xcel's treatment of King Unit 1 warranty-related costs, Prairie Island vendor credits, Riverside outage-related replacement power costs, and Xcel's presentation of MISO transmission loss costs.

On May 1, 2026, Xcel filed Reply Comments responding to the Department's recommendations and requests for clarification. Xcel provided additional information regarding: (1) the King Unit 1 warranty issue; (2) Prairie Island Units 1 and 2 refueling outage credits; (3) the Riverside outage; and (4) MISO reporting and transmission loss analysis. Xcel also requested that the Commission accept and approve the Company's 2025 FCA true-up as originally proposed.<sup>3</sup>

The Department responds to Xcel's May 1, 2026 Reply Comments below.

**II. DEPARTMENT RESPONSE TO XCEL'S MAY 1, 2026 REPLY COMMENTS**

**A. KING UNIT 1 WARRANTY RECOVERY**

In its Initial Comments, the Department requested Xcel explain whether the approximately \$1.5 million warranty recovery associated with the King Unit 1 planned outage extension had already been flowed back to customers, and if so, where that treatment was reflected.

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<sup>1</sup> *In the Matter of the Petition of Northern States Power Company for Approval of the 2025 Annual Fuel Forecast and Monthly Fuel Charges*, Petition, Xcel Energy, February 27, 2026, Docket No. E002/AA-24-63, (eDockets) [20262-228790-02](#)

<sup>2</sup> *In the Matter of the Petition of Northern States Power Company for Approval of the 2025 Annual Fuel Forecast and Monthly Fuel Charges*, Errata, Xcel Energy, March 4, 2026, Docket No. E002/AA-24-63, (eDockets) [20263-228911-01](#)

<sup>3</sup> *In the Matter of the Petition of Northern States Power Company for Approval of the 2025 Annual Fuel Forecast and Monthly Fuel Charges*, Reply Comments, Xcel Energy, May 1, 2026, Docket No. E002/AA-24-63, (eDockets) [20265-231314-01](#)

In Reply Comments, Xcel clarified that Siemens Energy did not provide a refund or credit to the Company. Instead, Siemens Energy attempted to submit change orders for approximately \$1.5 million of additional repair costs, and Xcel successfully disputed those charges under the warranty provisions of the vendor agreement. Xcel states that there were no credits to flow back to customers because the costs were not an obligation of the Company and were not charged to customers.<sup>4</sup>

Based on Xcel's explanation that the approximately \$1.5 million amount was an avoided cost rather than a refund or credit received by the Company, the Department does not recommend further action regarding the King Unit 1 warranty issue in this docket.

*B. PRAIRIE ISLAND UNITS 1 AND 2 REFUELING OUTAGE CREDITS*

In the Initial Comments, the Department requested that Xcel identify where the Prairie Island Units 1 and 2 refueling outage credits were reflected in base rates, including references to the relevant schedules or workpapers in Docket No. E002/GR-24-320.

In Reply Comments, Xcel explained that the credits were applied to the Fall 2024 Prairie Island Unit 1 refueling outage and the Fall 2025 Prairie Island Unit 2 refueling outage and reduced the costs customers would pay through base rates. Xcel further explained that the credits were received in 2025 after the Company filed its pending rate case in Docket No. E002/GR-24-320, so there are no relevant rate case schedules or workpapers showing those credits. Instead, Xcel stated that such credits or project cost reductions are reflected in the annual capital project true-up process, and the Company has not yet filed the capital true-up for 2025 actuals.<sup>5</sup>

The Department appreciates Xcel's clarification. However, because the credits have not yet been reflected in a filed true-up, the Department recommends that the Commission require Xcel, in the July 1, 2026 rate case capital projects true-up filing that reflects 2025 actuals, to separately identify the Prairie Island Unit 1 and Unit 2 vendor credits, show the jurisdictional allocation and revenue requirement impact of those credits, and explain how customers receive the benefit of those amounts.

*C. RIVERSIDE OUTAGE*

In its April 15, 2026 Comments, the Department recommended that the Commission reserve the determination of prudence and recovery of Riverside-related replacement power costs and refer the Riverside issue to a contested case to develop a full record.

In Reply Comments, Xcel opposed immediate referral to a contested case. Xcel explained that the Riverside outage remains ongoing, not all replacement power costs are known, total restoration costs are not final, the insurance claim adjustment is still in the early stages, and both the accounting treatment of any insurance proceeds and the mechanism by which customers would receive the benefit of any such proceeds remain unknown. Xcel also stated that it continues to assess whether to

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<sup>4</sup> Xcel's May 1, 2026 Reply Comments at 1 and 2.

<sup>5</sup> *ibid.*

file additional third-party claims. The Company instead recommends that the Commission defer any decision on prudence or a contested case until after Riverside returns to service, and offers to provide a final report within 90 days of Riverside's return to service.<sup>6</sup>

The Department agrees that the present record is not sufficient for final prudency determination. The Department also agrees that final cost quantification, insurance treatment, third-party recoveries, and customer crediting issues may be more complete after Riverside returns to service. However, the Department does not agree that the Commission must wait until all cost and insurance information is finalized before beginning a prudence review.

The key issue is not simply the final amount of replacement power costs. The key issue is whether Xcel's actions and decisions before and after the Riverside failure were prudent based on the information known or that should have been known at the time. That inquiry is primarily an engineering, operations, maintenance, and outage management review and decision. It can begin before final replacement power costs, insurance proceeds, or third-party recoveries are fully known. Deferring all review until Riverside returns to service would also delay the engineering and prudent inquiry, risk the loss of timely factual development, and prolong uncertainty over whether customers should bear Riverside-related replacement power costs.

For these reasons, the Department continues to prefer referral to a contested case sooner rather than later. We also request the Commission approve the Department's request to seek authorization to incur costs for any specialized services required to assist in this matter under [Minn. Stat. § 216B.62](#). Prompt referral would allow the record to be developed on engineering causation, inspection and maintenance history, operating decisions, outage response, repair strategy, vendor/OEM involvement, and whether Xcel acted reasonably to prevent, mitigate, and manage the outage. It would also allow the Department to retain and rely on an independent outside engineering consultant to evaluate technical issues that cannot be fully assessed through accounting or financial review alone.

The Commission can address these competing concerns by referring the Riverside issue to a contested case now and directing that the proceeding be structured in stages. The first stage would address engineering causation and prudence, including whether Xcel reasonably operated, inspected, maintained, and managed Riverside before and after the failure. A later stage, or supplemental record after Xcel's final report, would address final replacement power cost quantification, insurance proceeds, third-party recoveries, capacity-related impacts, customer-crediting treatment, and any refund or disallowance.

Accordingly, the Department continues to recommend that the Commission reserve the determination of prudence and recovery of Riverside-related replacement power costs and refer the Riverside issue to a contested case so that the record can be developed on whether Xcel prudently operated, inspected, maintained, and managed Riverside before and after the outage, and whether any Xcel imprudence caused, contributed to, prolonged, or increased the costs of the outage. The Department

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<sup>6</sup> Xcel's May 1, 2026 Reply Comments at 2 and 3.

also requests the Commission approve the Department's request to seek authorization to incur costs for any specialized services required to assist in this matter under Minn. Stat. § 216B.62. Alternatively, if the Commission determines that the contested-case review should not proceed until additional outage information is available, the Department recommends that the Commission now determine that a contested case is warranted for the Riverside Plant outage, given its magnitude and complexity, but delay initiating the proceeding until after Xcel files its final outage report within 90 days of Riverside's return to service.

*D. MISO REPORTING AND TRANSMISSION LOSS ANALYSIS*

In its April 15, 2026 Comments, the Department raised concerns regarding Xcel's presentation of MISO transmission loss costs. The Department noted that Xcel's original Table 2 appeared to compare forecast incremental transmission losses (ITL) to actual total transmission loss costs, which included both ITL and average system transmission losses.

In Reply Comments, Xcel provided a revised Table 2-R. Xcel's revised table shows actual ITL of approximately \$23.69 million, compared to forecast ITL of approximately \$9.198 million. Xcel also identifies approximately \$39.81 million of actual average system transmission losses. Xcel explains that an equivalent forecast figure for average system transmission losses cannot be shown because transmission and distribution losses are embedded within the hourly MW load forecast input to the PLEXOS simulation, and the forecast generation costs to serve those losses cannot be separated from the generation costs required to serve the underlying customer load. Xcel's revised Table 2-R also shows "MISO Charges Total" of approximately \$147.3 million compared to forecast MISO charges of approximately \$163.7 million, excluding average system transmission losses.<sup>7</sup>

The Department appreciates Xcel's clarification and does not recommend disallowance of the approximately \$39.81 million average system transmission loss amount on the current record. However, Xcel's Reply Comments confirm that the original Table 2 was not sufficiently transparent. The original Table 2 line labeled "Incremental Transmission Losses" did not present a like-for-like comparison between forecast and actual ITL because the actual value included transmission-loss components beyond ITL.

The Department therefore recommends the Commission require Xcel to use the revised Table 2-R format, or an equivalent format, in future FCA true-up filings. At a minimum, future filings should separately identify ITL, average system transmission losses, total transmission loss costs, and the forecast treatment of losses embedded in PLEXOS.

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<sup>7</sup> Xcel's May 1, 2026 Reply Comments at 3 and 4.

### III. DEPARTMENT RECOMMENDATIONS

The Department continues to recommend that the Commission approve Xcel's 2025 FCA true-up Petition with modifications, as described below:

- Regarding the King 1 warrant issue, based on Xcel's explanation that the approximately \$1.5 million amount was an avoided cost rather than a refund or credit received by the Company, the Department does not recommend further action regarding the King Unit 1 warranty issue in this docket.
- Regarding Prairie Island Units 1 and 2 refueling outage credits, the Department recommends that the Commission require Xcel, in the July 1, 2026 rate case capital projects true-up filing that reflects 2025 actuals, to separately identify the Prairie Island Unit 1 and Unit 2 vendor credits, show the jurisdictional allocation and revenue-requirement impact of those credits, and explain how customers receive the benefit of those amounts.
- Regarding the Riverside Outage, the Department continues to recommend the Commission reserve the determination of prudence and recovery of Riverside-related replacement power costs and refer the Riverside issue to a contested case so that the record can be developed on whether Xcel prudently operated, inspected, maintained, and managed Riverside before and after the outage, and whether any Xcel imprudence caused, contributed to, prolonged, or increased the costs of the outage. The Department also requests the Commission approve the Department's request to seek authorization to incur costs for any specialized services required to assist in this matter under Minn. Stat. § 216B.62. Alternatively, if the Commission determines that the contested-case review should not proceed until additional outage information is available, the Department recommends that the Commission now determine that a contested case is warranted for the Riverside Plant outage, given its magnitude and complexity, but delay initiating the proceeding until after Xcel files its final outage report within 90 days of Riverside's return to service.
- Regarding MISO reporting, the Department recommends the Commission require Xcel to use the revised Table 2-R format, or an equivalent format, in future FCA true-up filings to separately identify incremental transmission losses, average system transmission losses, total transmission losses, and the forecast treatment of losses embedded in PLEXOS.

## Attachments

## **CERTIFICATE OF SERVICE**

I, Sharon Ferguson, hereby certify that I have this day, served copies of the following document on the attached list of people 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  
Response Comments**

**Docket No. E002/AA-24-63**

Dated this **15<sup>th</sup>** day of **May 2026**

**/s/Sharon Ferguson**

| #  | First Name | Last Name          | Email                             | Organization   | Agency  | Address  | Delivery Method    | Alternate Delivery Method | View Trade Secret | Service List Name |
|----|------------|--------------------|-----------------------------------|--|---|--|--------------------|---------------------------|-------------------|-------------------|
| 1  | Kevin      | Adams              | kadams@caprw.org                  | Community Action Partnership of Ramsey & Washington Counties |   | 450 Syndicate St<br>N Ste 35<br>Saint Paul MN, 55104<br>United States            | Electronic Service |                           | No                | 24-63AA-24-63     |
| 2  | Mara       | Ascherman          | mara.k.ascherman@xcelenergy.com   | Xcel Energy  |   | 414 Nicollet Mall Fl 5<br>Minneapolis MN, 55401<br>United States                 | Electronic Service |                           | Yes               | 24-63AA-24-63     |
| 3  | Gail       | Baranko            | gail.baranko@xcelenergy.com       | Xcel Energy  |   | 414 Nicollet Mall 7th Floor<br>Minneapolis MN, 55401<br>United States            | Electronic Service |                           | Yes               | 24-63AA-24-63     |
| 4  | Jessica L  | Bayles             | jessica.bayles@stoel.com          | Stoel Rives LLP  |   | 1150 18th St NW Ste 325<br>Washington DC, 20036<br>United States                 | Electronic Service |                           | No                | 24-63AA-24-63     |
| 5  | Sasha      | Bergman            | sasha.bergman@state.mn.us         |  | Public Utilities Commission                                     | 121 7th PI E Ste 350<br>St. Paul MN, 55101<br>United States                      | Electronic Service |                           | Yes               | 24-63AA-24-63     |
| 6  | Elizabeth  | Brama              | ebrama@taftlaw.com                | Taft Stettinius & Hollister LLP                              |   | 2200 IDS Center<br>80 South 8th Street<br>Minneapolis MN, 55402<br>United States | Electronic Service |                           | No                | 24-63AA-24-63     |
| 7  | Matthew    | Brodin             | mbrodin@allete.com                | Minnesota Power  |   | 30 West Superior Street<br>Duluth MN, 55802<br>United States                     | Electronic Service |                           | No                | 24-63AA-24-63     |
| 8  | Mike       | Bull               | mike.bull@state.mn.us             |  | Public Utilities Commission                                     | 121 7th Place East, Suite 350<br>St. Paul MN, 55101<br>United States             | Electronic Service |                           | Yes               | 24-63AA-24-63     |
| 9  | James      | Canaday            | james.canaday@ag.state.mn.us      |  | Office of the Attorney General - Residential Utilities Division | Suite 1400 445 Minnesota St.<br>St. Paul MN, 55101<br>United States              | Electronic Service |                           | No                | 24-63AA-24-63     |
| 10 | John       | Coffman            | john@johncoffman.net              | AARP   |   | 871 Tuxedo Blvd.<br>St, Louis MO, 63119-2044<br>United States                    | Electronic Service |                           | No                | 24-63AA-24-63     |
| 11 | Generic    | Commerce Attorneys | commerce.attorneys@ag.state.mn.us |  | Office of the Attorney General - Department of Commerce         | 445 Minnesota Street Suite 1400<br>St. Paul MN, 55101<br>United States           | Electronic Service |                           | Yes               | 24-63AA-24-63     |
| 12 | George     | Crocker            | gwillc@nawo.org                   | North American Water Office                                  |   | 5093 Keats Avenue<br>Lake Elmo MN, 55042<br>United States                        | Electronic Service |                           | No                | 24-63AA-24-63     |
| 13 | James      | Denniston          | james.r.denniston@xcelenergy.com  | Xcel Energy Services, Inc.                                   |   | 414 Nicollet Mall, 401-8<br>Minneapolis MN, 55401<br>United States               | Electronic Service |                           | No                | 24-63AA-24-63     |

| #  | First Name  | Last Name | Email                                | Organization                                       | Agency  | Address   | Delivery Method    | Alternate Delivery Method | View Trade Secret | Service List Name |
|----|-------------|-----------|--------------------------------------|--|---|---|--------------------|---------------------------|-------------------|-------------------|
| 14 | Ian M.      | Dobson    | ian.m.dobson@xcelenergy.com          | Xcel Energy  |   | 414 Nicollet Mall, 401-8 Minneapolis MN, 55401 United States  | Electronic Service |                           | Yes               | 24-63AA-24-63     |
| 15 | Richard     | Dornfeld  | richard.dornfeld@ag.state.mn.us      |  | Office of the Attorney General - Department of Commerce | Minnesota Attorney General's Office 445 Minnesota Street, Suite 1800 Saint Paul MN, 55101 United States | Electronic Service |                           | No                | 24-63AA-24-63     |
| 16 | Christopher | Droske    | christopher.droske@minneapolismn.gov | Northern States Power Company dba Xcel Energy-Elec |   | 661 5th Ave N Minneapolis MN, 55405 United States   | Electronic Service |                           | No                | 24-63AA-24-63     |
| 17 | Brian       | Edstrom   | briane@cubminnesota.org              | Citizens Utility Board of Minnesota                |   | 332 Minnesota St Ste W1360 Saint Paul MN, 55101 United States   | Electronic Service |                           | No                | 24-63AA-24-63     |
| 18 | Rebecca     | Eilers    | rebecca.d.eilers@xcelenergy.com      | Xcel Energy  |   | 414 Nicollet Mall - 401 7th Floor Minneapolis MN, 55401 United States                                   | Electronic Service |                           | Yes               | 24-63AA-24-63     |
| 19 | 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                | 24-63AA-24-63     |
| 20 | Sharon      | Ferguson  | sharon.ferguson@state.mn.us          |  | Department of Commerce                                  | 85 7th Place E Ste 280 Saint Paul MN, 55101-2198 United States  | Electronic Service |                           | No                | 24-63AA-24-63     |
| 21 | Lucas       | Franco    | lfranco@liunagroc.com                | LIUNA  |   | 81 Little Canada Rd E Little Canada MN, 55117 United States   | Electronic Service |                           | No                | 24-63AA-24-63     |
| 22 | Edward      | Garvey    | garveyed@aol.com                     | Residence  |   | 32 Lawton St Saint Paul MN, 55102 United States   | Electronic Service |                           | No                | 24-63AA-24-63     |
| 23 | 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                | 24-63AA-24-63     |
| 24 | Matthew B   | Harris    | matt.b.harris@xcelenergy.com         | XCEL ENERGY  |   | 401 Nicollet Mall FL 8 Minneapolis MN, 55401 United States  | Electronic Service |                           | Yes               | 24-63AA-24-63     |
| 25 | Shubha      | Harris    | shubha.m.harris@xcelenergy.com       | Xcel Energy  |   | 414 Nicollet Mall, 401 - FL 8 Minneapolis MN, 55401 United States                                       | Electronic Service |                           | Yes               | 24-63AA-24-63     |

| #  | First Name | Last Name        | Email                              | Organization                                       | Agency  | Address  | Delivery Method    | Alternate Delivery Method | View Trade Secret | Service List Name |
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| 26 | Amber      | Hedlund          | amber.r.hedlund@xcelenergy.com     | Northern States Power Company dba Xcel Energy-Elec |   | 414 Nicollet Mall, 401-7 Minneapolis MN, 55401 United States         | Electronic Service |                           | No                | 24-63AA-24-63     |
| 27 | Adam       | Heinen           | aheinen@dakotaelectric.com         | Dakota Electric Association                        |   | 4300 220th St W Farmington MN, 55024 United States                   | Electronic Service |                           | No                | 24-63AA-24-63     |
| 28 | 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                | 24-63AA-24-63     |
| 29 | Michael    | Hoppe            | lu23@ibew23.org                    | Local Union 23, I.B.E.W.                           |   | 445 Etna Street Ste. 61 St. Paul MN, 55106 United States             | Electronic Service |                           | No                | 24-63AA-24-63     |
| 30 | Frank      | Hornstein        | frank.hornstein@minneapolismn.gov  | City of Minneapolis                                |   | 350 South 5th Street Minneapolis MN, 55415 United States             | Electronic Service |                           | No                | 24-63AA-24-63     |
| 31 | Alan       | Jenkins          | aj@jenkinsatlaw.com                | Jenkins at Law                                     |   | 2950 Yellowtail Ave. Marathon FL, 33050 United States                | Electronic Service |                           | No                | 24-63AA-24-63     |
| 32 | Richard    | Johnson          | rickjohnson@cozen.com              | Cozen O'Connor                                     |   | 150 S. 5th Street Suite 1200 Minneapolis MN, 55402 United States     | Electronic Service |                           | No                | 24-63AA-24-63     |
| 33 | Sarah      | Johnson Phillips | sjphillips@stoel.com               | Stoel Rives LLP                                    |   | 33 South Sixth Street Suite 4200 Minneapolis MN, 55402 United States | Electronic Service |                           | No                | 24-63AA-24-63     |
| 34 | Michael    | Krikava          | mkrikava@taftlaw.com               | Taft Stettinius & Hollister LLP                    |   | 2200 IDS Center 80 S 8th St Minneapolis MN, 55402 United States      | Electronic Service |                           | No                | 24-63AA-24-63     |
| 35 | Carmel     | Laney            | carmel.laney@stoel.com             | Stoel Rives LLP                                    |   | 33 South Sixth Street Suite 4200 Minneapolis MN, 55402 United States | Electronic Service |                           | No                | 24-63AA-24-63     |
| 36 | Annie      | Levenson Falk    | annief@cupminnesota.org            | Citizens Utility Board of Minnesota                |   | 332 Minnesota Street, Suite W1360 St. Paul MN, 55101 United States   | Electronic Service |                           | No                | 24-63AA-24-63     |
| 37 | Ryan       | Long             | ryan.j.long@xcelenergy.com         |  |   | 414 Nicollet Mall 401 8th Floor Minneapolis MN, 55401 United States  | Electronic Service |                           | Yes               | 24-63AA-24-63     |
| 38 | Alice      | Madden           | alice@communitypowermn.org         | Community Power                                    |   | 2720 E 22nd St Minneapolis   | Electronic Service |                           | No                | 24-63AA-24-63     |

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|    |                |                                |                                      |                                      |   | MN, 55406<br>United States   |                    |                           |                   |                   |
| 39 | Kavita         | Maini                          | kmaini@wi.rr.com                     | KM Energy Consulting, LLC            |   | 961 N Lost Woods Rd<br>Oconomowoc WI, 53066<br>United States                   | Electronic Service |                           | No                | 24-63AA-24-63     |
| 40 | Christine      | Marquis                        | regulatory.records@xcelenergy.com    | Xcel Energy                          |   | 414 Nicollet Mall<br>MN1180-07-MCA<br>Minneapolis MN, 55401<br>United States   | Electronic Service |                           | Yes               | 24-63AA-24-63     |
| 41 | Mary           | Martinka                       | mary.a.martinka@xcelenergy.com       | Xcel Energy Inc                      |   | 414 Nicollet Mall<br>7th Floor<br>Minneapolis MN, 55401<br>United States       | Electronic Service |                           | Yes               | 24-63AA-24-63     |
| 42 | Erica          | McConnell                      | emcconnell@elpc.org                  | Environmental Law & Policy Center    |   | 35 E. Wacker Drive, Suite 1600<br>Chicago IL, 60601<br>United States           | Electronic Service |                           | No                | 24-63AA-24-63     |
| 43 | Andrew         | Moratzka                       | andrew.moratzka@stoel.com            | Stoel Rives LLP                      |   | 33 South Sixth St Ste 4200<br>Minneapolis MN, 55402<br>United States           | Electronic Service |                           | No                | 24-63AA-24-63     |
| 44 | Christa        | Moseng                         | christa.moseng@state.mn.us           |                                      | Office of Administrative Hearings                               | P.O. Box 64620<br>Saint Paul MN, 55164-0620<br>United States                   | Electronic Service |                           | No                | 24-63AA-24-63     |
| 45 | David          | Niles                          | david.niles@avantenergy.com          | Minnesota Municipal Power Agency     |   | 220 South Sixth Street Suite 1300<br>Minneapolis MN, 55402<br>United States    | Electronic Service |                           | No                | 24-63AA-24-63     |
| 46 | Carol A.       | Overland                       | overland@legalelectric.org           | Legalelectric - Overland Law Office  |   | 1110 West Avenue<br>Red Wing MN, 55066<br>United States                        | Electronic Service |                           | No                | 24-63AA-24-63     |
| 47 | Generic Notice | Residential Utilities Division | residential.utilities@ag.state.mn.us |                                      | Office of the Attorney General - Residential Utilities Division | 1400 BRM Tower<br>445 Minnesota St<br>St. Paul MN, 55101-2131<br>United States | Electronic Service |                           | Yes               | 24-63AA-24-63     |
| 48 | Kevin          | Reuther                        | kreuther@mncenter.org                | MN Center for Environmental Advocacy |   | 26 E Exchange St, Ste 206<br>St. Paul MN, 55101-1667<br>United States          | Electronic Service |                           | No                | 24-63AA-24-63     |
| 49 | Amanda         | Rome                           | amanda.rome@xcelenergy.com           | Xcel Energy                          |   | 414 Nicollet Mall FL 5<br>Minneapolis MN, 55401<br>United States               | Electronic Service |                           | Yes               | 24-63AA-24-63     |
| 50 | Joseph L       | Sathe                          | jsathe@kennedy-graven.com            | Kennedy & Graven, Chartered          |   | 150 S 5th St Ste 700<br>Minneapolis MN, 55402<br>United States                 | Electronic Service |                           | No                | 24-63AA-24-63     |
| 51 | Elizabeth      | Schmiesing                     | eschmiesing@winthrop.com             | Winthrop & Weinstine,                |   | 225 South Sixth Street   | Electronic Service |                           | No                | 24-63AA-          |

| #  | First Name | Last Name         | Email                         | Organization                            | Agency   | Address   | Delivery Method       | Alternate Delivery Method | View Trade Secret | Service List Name     |
|----|------------|-------------------|-------------------------------|---|--|---|-----------------------|---------------------------|-------------------|-----------------------|
|    |            |                   |                               | P.A.                                    |  | Suite 3500<br>Minneapolis<br>MN, 55402<br>United States   |                       |                           |                   | 24-63                 |
| 52 | Peter      | Scholtz           | peter.scholtz@ag.state.mn.us  |   | Office of the<br>Attorney<br>General -<br>Residential<br>Utilities<br>Division | Suite 1400<br>445<br>Minnesota<br>Street<br>St. Paul MN,<br>55101-2131<br>United States                           | Electronic<br>Service |                           | No                | 24-<br>63AA-<br>24-63 |
| 53 | Janet      | Shaddix<br>Elling | jshaddix@janetshaddix.com     | Shaddix And<br>Associates               |  | 7400 Lyndale<br>Ave S Ste<br>190<br>Richfield MN,<br>55423<br>United States                                       | Electronic<br>Service |                           | No                | 24-<br>63AA-<br>24-63 |
| 54 | Joshua     | Smith             | joshua.smith@sierraclub.org   |   |  | 85 Second St<br>FL 2<br>San<br>Francisco<br>CA, 94105<br>United States  | Electronic<br>Service |                           | No                | 24-<br>63AA-<br>24-63 |
| 55 | Ken        | Smith             | ken.smith@districtenergy.com  | District<br>Energy St.<br>Paul Inc.     |  | 76 W Kellogg<br>Blvd<br>St. Paul MN,<br>55102<br>United States  | Electronic<br>Service |                           | No                | 24-<br>63AA-<br>24-63 |
| 56 | Beth       | Soholt            | bsoholt@cleangridalliance.org | Clean Grid<br>Alliance                  |  | 570 Asbury<br>Street Suite<br>201<br>St. Paul MN,<br>55104<br>United States                                       | Electronic<br>Service |                           | No                | 24-<br>63AA-<br>24-63 |
| 57 | Byron E.   | Starns            | byron.starns@stinson.com      | STINSON<br>LLP                          |  | 50 S 6th St<br>Ste 2600<br>Minneapolis<br>MN, 55402<br>United States  | Electronic<br>Service |                           | No                | 24-<br>63AA-<br>24-63 |
| 58 | Scott      | Strand            | sstrand@elpc.org              | Environmental<br>Law & Policy<br>Center |  | 60 S 6th<br>Street<br>Suite 2800<br>Minneapolis<br>MN, 55402<br>United States                                     | Electronic<br>Service |                           | No                | 24-<br>63AA-<br>24-63 |
| 59 | Carla      | Vita              | carla.vita@state.mn.us        | MN DEED                                 |  | Great<br>Northern<br>Building<br>12th Floor<br>180 East Fifth<br>Street<br>St. Paul MN,<br>55101<br>United States | Electronic<br>Service |                           | No                | 24-<br>63AA-<br>24-63 |
| 60 | Joseph     | Windler           | jwindler@winthrop.com         | Winthrop &<br>Weinstine                 |  | 225 South<br>Sixth Street,<br>Suite 3500<br>Minneapolis<br>MN, 55402<br>United States                             | Electronic<br>Service |                           | No                | 24-<br>63AA-<br>24-63 |
| 61 | Kurt       | Zimmerman         | kwz@ibew160.org               | Local Union<br>#160, IBEW               |  | 2909 Anthony<br>Ln<br>St Anthony<br>Village MN,<br>55418-3238<br>United States                                    | Electronic<br>Service |                           | No                | 24-<br>63AA-<br>24-63 |
| 62 | Patrick    | Zomer             | pzomer@cozen.com              | Cozen<br>O'Connor                       |  | 150 S. 5th<br>Street, #1200<br>Minneapolis<br>MN, 55402<br>United States  | Electronic<br>Service |                           | No                | 24-<br>63AA-<br>24-63 |