

BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

Katie J. Sieben
Hwikwon Ham
Audrey C. Partridge
Joseph K. Sullivan
John A. Tuma

Chair
Commissioner
Commissioner
Commissioner
Commissioner

SERVICE DATE: November 20, 2025

In the Matter of Minnesota Power's 2024
Conservation Improvement Program
Consolidated Filing

DOCKET NO. E-015/M-25-48

In the Matter of Otter Tail Power Company's
Annual Filing of the Demand Side Management
Financial Incentive Project and to Update the
Energy Conservation and Optimization Rider

DOCKET NO. E-017/M-25-49

In the Matter of Xcel Energy's 2024 Energy
Conservation and Optimization Consolidated
Filing

DOCKET NO. E-002/M-25-50
DOCKET NO. G-002/M-25-47

In the Matter of CenterPoint Energy's Natural
Gas Energy Conservation and Optimization 2024
Status Report and Associated Compliance Filings

DOCKET NO. G-008/M-25-43

In the Matter of Great Plains Natural Gas
Company's ECO Tracker and Shared Savings
DSM Incentive

DOCKET NO. G-004/M-25-44

In the Matter of Greater Minnesota Gas, Inc.'s
Petition for Approval of 2023 Energy
Conservation and Optimization Program Tracker
Account and Proposed Conservation Cost
Recovery Adjustment

DOCKET NO. G-022/M-24-45

In the Matter of the Petition of Minnesota Energy
Resources Corporation for Approval of the 2024
Energy Conservation and Optimization Program
Tracker Account, Demand-Side Management
Financial Incentive, and Conservation Cost
Recovery Adjustment Factor

DOCKET NO. G-011/M-25-46

The above-entitled matter was considered by the Commission on November 13, 2025, and the following disposition made:

1. Required utilities to work directly with the Commission's Consumer Affairs Office Staff prior to making their Environmental Conservation and Optimization (ECO) filings. Required the notification language to be included in the ECO filing, along with a statement confirming the date the language was reviewed by Consumer Affairs Office staff.

Minnesota Power

2. Approved Minnesota Power's requested demand-side management (DSM) Shared Savings Financial Incentive of \$2,600,685 for 2024 activities.
3. Approved Minnesota Power's 2024 ECO Tracker, resulting in a year-end balance of \$2,184,533.
4. Approved Minnesota Power's proposed Conservation Performance Adjustment factor of \$0.000817/kWh, to be effective in the first month following this Order.
5. Approved Minnesota Power's proposed carrying charge rate of 0.6458% for the ECO Tracker, to be effective in the first month following this Order.
6. Required Minnesota Power to submit a compliance filing, within 10 days of this Order, with revised tariff sheets reflecting the Commission's determinations in this matter.

Otter Tail Power

7. Approved Otter Tail Power's proposal for a temporary financial incentive mechanism, for Otter Tail Power, at the same level of net benefits payout as the Company's ECO and Load Management energy savings net benefit payout, using the Minnesota Cost Test, until a formal Efficient Fuel Switching (EFS) financial incentive is approved by the Commission.
8. Approved Otter Tail Power's requested DSM Shared Savings Financial Incentive of \$1,964,142 for 2024 activities.
9. Approved Otter Tail Power's 2024 ECO Tracker, resulting in a year-end balance of (\$3,194,439).
10. Approved Otter Tail Power's request for a Conservation Cost Recovery Adjustment (CCRA) of \$0.00585/kWh, to be effective November 2025 or the first month following this Order.
11. Approved Otter Tail Power's proposed CCRA tariff language changes.
12. Granted Otter Tail's request for a variance to Minn. Rules 7820.3500 (K) for one year from the date of this Order.

13. Required Otter Tail Power to submit a compliance filing, within 10 days of this Order, with revised tariff sheets reflecting the Commission's determinations in this matter.

Xcel Electric

14. Approved Xcel Electric's requested DSM Shared Savings Financial Incentive of \$15,133,727 for 2024 activities.
15. Approved Xcel Electric's 2024 ECO Tracker, resulting in a year-end balance of (\$41,453,010).
16. Approved Xcel Electric's proposed Conservation Improvement Program (CIP) adjustment factor of \$0.001397/kWh, to be effective in the first month following this Order.
17. Approved Xcel Electric's proposed bill message effective the first month the proposed CIP adjustment factor takes effect, revised as necessary to incorporate the approved cost adjustment factor and effective date.
18. Required Xcel Electric to submit a compliance filing, within 10 days of this Order, with revised tariff sheets reflecting the Commission's determinations in this matter.

CenterPoint Energy

19. Approved CenterPoint Energy's requested DSM Shared Savings Financial Incentive of \$7,942,034 for 2024 activities, less \$61,981, representing claimed savings from Efficient Fuel Switching Air Source Heat Pump installations.
20. Approved CenterPoint Energy's 2024 ECO Tracker, resulting in a year-end balance of \$23,652,462.
21. Approved CenterPoint Energy's proposed CCRA of \$0.1885 per Dth, effective in the first month following this Order.
22. Approved CenterPoint Energy's proposed bill message.
23. Required CenterPoint Energy to submit a compliance filing, within 10 days of this Order, with revised tariff sheets reflecting the Commission's determinations in this matter.

Great Plains Natural Gas

24. Approved Great Plains Natural Gas' 2024 ECO Tracker, resulting in a year-end balance of \$104,528.
25. Approved Great Plains Natural Gas' proposed CCRA of \$0.0924/Dth, to be effective in the first month following this order.

26. Approved Great Plains Natural Gas' proposed bill message.

27. Required Great Plains Natural Gas to submit a compliance filing, within 10 days of this Order, with revised tariff sheets reflecting the Commission's determinations in this matter.

Greater Minnesota Gas

28. Required Greater Minnesota Gas to submit updated annual ECO trackers, along with any proposed financial incentives, rider changes, or other relevant matters, to the Commission on May 1 of each year going forward.

29. Required Greater Minnesota Gas, in next year's filing, to propose a carrying charge rate for implementation in its ECO tracker account for each year going forward.

Minnesota Energy Resources Corporation

30. Approved Minnesota Energy Resources Corporation's (MERC's) requested DSM Shared Savings Financial Incentive of \$998,125 for 2024 activities.

31. Approved MERC's 2024 ECO Tracker, resulting in a year-end balance of \$50,592.

32. Approved MERC's proposed CCRA of \$0.00638 per therm, effective January 1, 2026, or in the first month following this order, whichever is later.

33. Approved MERC's proposed bill message.

34. Required MERC to submit a compliance filing, within 10 days of this Order, with revised tariff sheets reflecting the Commission's determinations in this matter.

Xcel Gas

35. Approved Xcel Gas' requested DSM Shared Savings Financial Incentive of \$4,313,292 for 2024 activities.

36. Approved Xcel Gas' 2024 ECO Tracker, resulting in a year-end balance of \$3,004,761.

37. Approved Xcel Gas' proposed CIP adjustment factor of \$0.014081 per therm, to be effective in the first month following this Order.

38. Approved Xcel Gas' proposed bill message effective the first month the proposed CIP adjustment factor takes effect, revised as necessary to incorporate the approved cost adjustment factor and effective date.

39. Required Xcel Gas to submit a compliance filing, within 10 days of this Order, with revised tariff sheets reflecting the Commission's determinations in this matter.

The Commission agrees with and adopts the recommendations of the Department of Commerce, which are attached and hereby incorporated into the Order. This Order shall become effective immediately.



BY ORDER OF THE COMMISSION

A handwritten signature in black ink, appearing to read "Sasha Bergman", with a long horizontal flourish extending to the right.

Sasha Bergman
Executive Secretary

To request this document in another format such as large print or audio, call 651.296.0406 (voice). Persons with a hearing or speech impairment may call using their preferred Telecommunications Relay Service or email consumer.puc@state.mn.us for assistance.

August 14, 2025

Mike Bull
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. G008/M-25-43

Dear Mr. Bull:

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

*CenterPoint Energy's Natural Gas Energy Conservation and Optimization
2024 Status Report & Associated Compliance Filings (Petition)*

The Petition was filed by CenterPoint Energy on May 1, 2025.

The Department recommends that the Minnesota Public Utilities Commission (Commission) approve CenterPoint Energy's Petition. The Department is available to answer any questions that the Commission may have in this matter.

Sincerely,

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



Before the Minnesota Public Utilities Commission

Comments of the Minnesota Department of Commerce

Docket No. G008/M-25-43

I. INTRODUCTION

On May 1, 2025, CenterPoint Energy (CPE or the Company) submitted its Petition with the Commission in docket no. G008/M-25-43. In its Petition, the Company requests that the Commission approve:

- Performance incentive of \$7,942,034 for 2024 ECO activities.
- 2024 ECO tracker account, resulting in a December 31, 2024, tracker balance of \$23,652,462.
- Conservation Cost Recovery Adjustment (CCRA) of \$0.01885/therm to be effective October 1, 2025.

The Petition also contains the Company's 2024 Energy Conservation and Optimization (ECO) Status Report (Status Report). The Status Report is intended to fulfill the requirements of the Department's annual ECO reporting rules contained in Minnesota Rules part 7690.0550. Since the Company's Status Report does not require Commission approval, this portion of the Petition has been assigned to a separate docket.¹

II. PROCEDURAL BACKGROUND

May 1, 2025	The Company submitted its Petition with the Commission.
May 16, 2025	The Commission posted a Notice of Comment Period for the Petition.
July 28, 2025	The Department filed a request for variance extension, requesting an additional 14 days to complete its analysis and file comments.
July 28, 2025	The Commission granted the request for extension.

Topics open for comment:

- Should the Commission approve CenterPoint Energy's proposed DSM Financial Incentive of \$7,942,034 for ECO activities in 2024?
- Should the Commission approve CenterPoint Energy's proposed 2024 ECO Tracker Account, resulting in a year-end balance of \$23,652,462?
- Should the Commission approve CenterPoint Energy's proposed 2026-2027 CCRA of \$0.01885 per therm, effective October 1, 2025?
- Are there other issues or concerns related to this matter?

¹ See Docket No. G008/CIP-23-95

III. DEPARTMENT ANALYSIS

The Department's analysis of the Company's Petition is provided below in the following sections:

- A. Commission's Order from the Previous Year
- B. Minnesota's Energy Conservation and Optimization Statute
- C. Proposed 2024 Shared Savings DSM Financial Incentive
- D. Proposed 2024 ECO Tracker
- E. Proposed Conservation Cost Recovery Adjustment
- F. Historical ECO Achievements and Shared Savings Incentives

A. COMMISSION'S ORDER FROM THE PREVIOUS YEAR

On November 8, 2024, the Commission issued its Order approving CPE's Natural Gas Conservation Improvement Program 2023 Status Report & Associated Compliance Filings,² with the following determinations:

1. Approved a 2023 Demand-Side Management (DSM) financial incentive of \$8,450,662 to be included in CenterPoint Energy's tracker account no sooner than the issue date of the Commission's Order in the instant docket.
2. Approved CenterPoint Energy's 2023 Conservation Improvement Program (CIP) tracker account activities with a December 31, 2023, ending balance of \$6,131,707
3. Approved the revised gas Conservation Cost Recovery Adjustment (CCRA) of \$0.1704 per dekatherm (Dth) for all of CenterPoint Energy's Minnesota customer classes, effective the first billing cycle in the month following the Commission's Order in this matter.
4. Approved CenterPoint Energy's customer notification message that reads as follows: The PUC has approved a Conservation Cost Recovery Adjustment (CCRA) factor of \$0.01704 per therm. This charge will be used to fund energy conservation activities and has been added to your delivery charge. For more information, please call or visit our website.
5. Required CenterPoint Energy to submit a compliance filing with tariff sheets including all necessary calculations within 10 days of the issue date of the Order.

B. MINNESOTA'S ENERGY CONSERVATION AND OPTIMIZATION STATUTE

In 2021, the Minnesota Legislature passed the Energy Conservation and Optimization Act (ECO Act).³ The ECO Act primarily serves to modernize what was the Conservation Improvement Program (CIP) to provide a more holistic approach to energy efficiency programming. Notable highlights of the ECO Act include:

² See Commission's November 8, 2024, Order in Docket No. G-008/M-24-43.

³https://www.revisor.mn.gov/bills/text.php?number=HF164&type=bill&version=2&session=ls92&session_year=2021&session_number=0

- Providing participating electric and natural gas utilities the opportunity to optimize energy use and delivery through the inclusion of load management⁴ and efficient fuel-switching (EFS) programs.⁵
- Raising the energy savings goals for the state's electric investor-owned utilities (IOUs).⁶
- More than doubling the low-income spending requirement for all IOUs.⁷
- Providing greater planning flexibility for participating municipal and cooperative utilities.⁸
- Including activities to improve energy efficiency for public schools.⁹

Minn. Stat. § 216B.241 (ECO Statute) provides the framework for IOU ECO programs that deliver energy savings, load management programs, and EFS measures. This includes annual savings goals, which are determined as a percentage of the most recent three-year average of gross retail sales after subtracting sales to ECO-exempt customers.¹⁰ 2024-2026 is the first program year period where requirements from the ECO Act take effect for the IOUs' ECO programs.

The ECO Statute grants jurisdiction to the Department over most of the state's ECO program regulatory activities. The Commission continues to have jurisdiction over two specific conservation items relevant to this proceeding: the Shared Savings DSM Financial Incentive and the recovery of ECO costs.

The Department has regulatory oversight in reviewing and approving utility plans and performance,¹¹ determining cost-effectiveness methodologies¹², and the overall administration of the ECO framework.¹³ Utilities are also allowed to recover costs incurred from delivering ECO programs approved by the Department,¹⁴ which are recovered through a tracker account reviewed and approved annually by the Commission.¹⁵ Finally, the Commission can approve incentive plans encouraging utility success through ECO programs provided the plans meet certain statutory requirements.¹⁶ The Commission has approved Shared Savings DSM Financial Incentive mechanisms for each three-year Triennial Plan since 2010 through Docket No. E,G-999/CI-08-133,¹⁷ and approves annual financial incentives through the ECO tracker account proceedings.¹⁸

⁴ Minn. Stat. § 216B.241, subd. 13.

⁵ Minn. Stat. § 216B.2403, subd. 8.

⁶ Minn. Stat. § 216B.241, subd. 1c(b).

⁷ Minn. Stat. § 216B.241, subd. 7(a).

⁸ Minn. Stat. § 216B.2403, subd. 3.

⁹ Minn. Stat. §§ 216B.2403, subd 3(j) and 216B.241, subd. 2(i).

¹⁰ Minn. Stat. § 216B.241, subd. 1c.

¹¹ Minn. Stat. § 216B.241 Subd. 2 et seq

¹² Minn. Stat. § 216B.241 Subd. 1c(e)

¹³ Minn. Stat. § 216B.241, 216B.2402, 216B,2403 and Minn. Rules 7690

¹⁴ Minn. Stat. § 216B.241, subd. 2b.

¹⁵ Minn. Stat. § 216B.16, subd. 6b.

¹⁶ Minn. Stat. § 216B.16, subd. 6c.

¹⁷ Commission Order Establishing Utility Performance Incentives for Energy Conservation, January 27, 2010, Docket Number E,G-999/CI-08-133.

¹⁸ See Commission Orders in Docket Numbers G-008/M-24-43, G-004/M-24-44, G-022/M-24-45, G-011/M-24-46, G-002/M-24-47, E-015/M-24-48, E-017/M-24-49, and E-002/M-24-50.

C. *PROPOSED 2024 SHARED SAVINGS FINANCIAL INCENTIVE*

C.1. *Key Parameters from the 2024-2026 Shared Savings DSM Financial Incentive Plan*

On January 25, 2024, the Commission’s Order approved the current Shared Savings DSM Financial Incentive Plan, which applies to investor-owned gas and electric utilities for savings achieved through ECO during the 2024–2026 Triennial.¹⁹ The Department’s review of the Petition’s proposed Shared Savings Financial Incentive was informed by the requirements included in the Commission’s January 25, 2024 Order.

The current incentive mechanism awards utilities a percentage of their portfolio-wide Minnesota Test net benefits depending on their first-year energy savings achievement. In 2024, the cost-effectiveness test used to calculate net benefits for purposes of the incentive mechanism switched from the Utility Cost Test to the newly developed Minnesota Test, which incorporates additional considerations when measuring cost-effectiveness, such as greenhouse gas emission reductions. The 2024–2026 incentive mechanism modified the previous 2021–2023 incentive mechanism by updating achievement goals for first-year energy savings and the corresponding percentages of net benefits awarded, partially to account for the change in cost-effectiveness tests.

Tables 1 and 2 show the range of annual first-year energy savings a utility can achieve during the 2024–2026 Triennial and the corresponding percentage of net benefits awarded for each level of first-year energy savings.

Table 1: 2024–2026 Natural Gas Incentive

First-Year Energy Savings Achievement (% of Retail Sales)	% of Net Benefits Awarded
0.7% (threshold) ²⁰	1.90%
0.8%	2.32%
0.9%	2.74%
1.0%	3.16%
1.1%	3.58%
1.2% (goal) ²¹	4.00% (cap)

¹⁹ Order Adopting Modifications to Shared Savings Demand-Side Management Financial Incentive Plan, January 25, 2024. Docket Number E,G-999/CI-08-133.

²⁰ The achievement threshold refers to the achievement level a utility must reach before they begin earning an incentive for a given metric.

²¹ The achievement goal refers to the achievement level that aligns with the maximum percentage of net benefits a utility can earn for a given metric.

Table 2: 2024–2026 Electric Incentive

First-Year Energy Savings Achievement (% of Retail Sales)	% of Net Benefits Awarded
1.5% (threshold)	1.30%
1.6%	1.90%
1.7%	2.50%
1.8%	3.10%
1.9%	3.70%
2.0%	4.30%
2.1%	4.90%
2.2% (goal)	5.50% (cap)

Incentive caps limit the total incentive each utility can earn. The 2024–2026 incentive mechanism includes two incentive caps for each utility, one based on net benefits (Net Benefits Cap) and one on portfolio expenditures (Expenditures Cap), with the incentive amount being limited to whichever cap is lower.²² For the 2024–2026 incentive, the gas Net Benefits Cap equals 4 percent of portfolio net benefits and the Expenditures Cap equals 20 percent of total portfolio expenditures. For electric utilities, the Net Benefits Cap equals 5.5 percent of portfolio net benefits and the Expenditures Cap equals 20 percent of total portfolio expenditures. For both gas and electric utilities, the Expenditures Cap increases from 20 to 25 percent if the utility achieves or surpasses the maximum first-year energy savings goal, which is 1.2 percent of average retail sales for gas utilities and 2.2 percent of average retail sales for electric utilities.

Under the ECO framework, gas utilities can include savings and net benefits from qualifying EFS programs when calculating their financial incentive, effectively treating EFS programs the same as traditional ECO programs, provided it has achieved energy savings from non-EFS programs at or above 1 percent of retail sales.²³ An electric utility cannot currently count savings or net benefits from EFS measures when calculating its overall Shared Savings DSM incentive, but a utility, the Department, or other stakeholder may propose a separate EFS incentive for approval by the Commission.²⁴

C.2. The Department’s Review of the Proposed Shared Savings DSM Financial Incentive

The Petition covers ECO activities occurring in program year 2024. The Company reported incentive-eligible total first-year energy savings of 1,890,592 Dth (approximately 1.29% of ECO-applicable retail sales), total expenditures of \$62,705,528, and net benefits of \$198,550,843. To calculate the financial incentive, the Company excluded the third-party EnerChange and Energy Smart Alternative ECO

²² Order Adopting Modifications to Shared Savings Demand-Side Management Financial Incentive Plan, January 25, 2024. Docket Number E,G-999/CI-08-133.

²³ Commission’s Order Adopting Modifications to Shared Savings Demand-Side Management Financial Incentive Plan, January 25, 2024, Docket Number E,G-999/CI-08-133.

²⁴ Minn. Stat. § 216B.16, subd. 6c

programs and excluded assessments under Minnesota Statute § 216B.241 from its financial incentive calculations.

Based on the terms and conditions of its approved Shared Savings DSM financial incentive plan, the Company requested recovery of a financial incentive of \$7,942,034. The Company's proposed incentive is equal to 4.00% (\$7,942,034/\$198,550,843) of the Company's 2024 calculated net benefits and 12.66% (\$7,942,034/\$62,705,528) of the Company's 2024 expenditures.

The Department's review indicates that the Company correctly calculated its financial incentive for 2024 ECO achievements and did not violate the Commission-approved caps. Therefore, the Department recommends that the Commission approve the Company's 2024 Shared Savings financial incentive of \$7,942,034.

Additionally, should the Commission find it helpful context, the Department also evaluated the broader ECO program achievements reported in the Company's Status Report. As mentioned earlier, since the Company's Status Report does not require Commission approval, this portion of the Petition has been assigned to a separate docket.²⁵ On June 23, 2025, the Department filed a Staff Proposed Decision. The Proposed Decision provides Staff's evaluation of the Status Report's compliance with Minnesota Statutes and Rules, and Staff's examination of the technical assumptions behind the Company's reported ECO performance to ensure that energy savings are cost-effective, measurable, and verifiable. On August 7, 2025, the Department's Assistant Commissioner approved the Company's Status Report achievements.

D. PROPOSED 2024 ECO TRACKER

In its Petition, the Company requested approval of its report on recoveries and expenditures included in the Company's ECO tracker account. This activity can be found in Section 3, page 81 of the utility's Petition and is summarized below in Table 3.

Table 3: Summary of 2024 ECO Tracker Account

Line	Description	Time Period	Amount
1	Beginning Balance	Jan. 1, 2024	\$6,131,707
2	Total ECO Expenses ²⁶	Jan. 1, 2024 – Dec. 31, 2024	\$64,027,295
3	DSM Financial Incentive	Approved in 2024 for 2023 Activities	\$8,450,662
4	Carrying Charges	Jan. 1, 2024 – Dec. 31, 2024	(\$964)
5	ECO Expenses Subtotal [Line 1 + Line 2 + Line 3 + Line 4]	Jan. 1, 2024 – Dec. 31, 2024	\$78,608,700
6	CCRC Recovery	Jan. 1, 2024 – Dec. 31, 2024	(\$41,673,139)
7	CCRA Recovery	Jan. 1, 2024 – Dec. 31, 2024	(\$13,283,100)
8	ECO Revenues Subtotal [Line 6 + Line 7]	Jan. 1, 2024 – Dec. 31, 2024	(\$54,956,239)
9	Ending Balance [Line 5 + Line 8]	Dec. 31, 2024	\$23,652,462

²⁵ See Docket No. G008/CIP-23-95

²⁶ Includes \$767,858 in assessments and \$553,909 from alternative ECO program spending.

The Department reviewed Section 3 of the Petition and concludes that the Company correctly calculated its 2024 ECO Tracker account. Therefore, the Department recommends the Commission approve the Company's 2024 ECO tracker, resulting in a year-end balance of \$23,652,462.

E. PROPOSED CONSERVATION COST RECOVERY ADJUSTMENT

Minnesota Statutes 2016B.16., Subd. 6b(c) states that the Commission "may permit a public utility to file rate schedules providing for annual recovery of the costs of energy conservation improvements." This ECO recovery mechanism is generally referred to as the Conservation Cost Recovery Adjustment (CCRA).

E.1. CCRA Proposal

On November 8, 2024, the Commission approved CPE's request to implement the CCRA in the amount of \$0.1704 per Dth, which went into effect on December 1, 2024. The Company proposes to increase the CCRA to \$0.1885 per Dth (representing a \$0.0181 per Dth increase) beginning October 1, 2025.

As noted by the Company in Section 4, page 84 of the Petition:

In the event that Commission approval of the proposed adjustment is delayed beyond September 19, 2025 (in order to implement the rate change by October 1), the Company will continue to apply the current CCRA of \$0.1704 per Dth up to the first of the month following Commission approval of a revised factor. In this case, the Company may recalculate the CCRA.

The Company based the proposed CCRA factor on projected ECO spending and recovery for 2025 and 2026. CPE's projected ECO spending was based on the currently approved 2025 and 2026 budgets from CPE's 2024-2026 ECO Triennial Plan, as follows:²⁷

- 2025: Based on the currently approved total budget equal to \$60,869,188, except for January through March in 2025, which reflects actual spending.
- 2026: Based on the currently approved total budget equal to \$64,383,293.

As stated in Section 4, page 85 of the Petition, "The Company calculated carrying charges using the settlement short-term debt interest factor (0.39%) from the Company's 2021 rate case for the rest of 2025 and 2026."²⁸

²⁷ For CPE's currently approved 2025 and 2026 ECO budgets, see the "Assistant Commissioner's Decision in the Matter of CenterPoint Energy's February 7, 2025, ECO Triennial Plan Program Modification Request." March 27, 2025. Docket No. G008/CIP-23-95

²⁸ As approved by the Commission in In the Matter of the Application by CenterPoint Energy Resources Corp., d/b/a CenterPoint Energy Minnesota Gas (CPE) for Authority to Increase Natural Gas Utility Service in Minnesota, Docket No. G-008/GR-21-435, Order (Mar. 23, 2022).

If the proposed rate were to be effective beginning October 1, 2025, the Company's year-end 2026 tracker balance would be \$5,496, as shown in Table 4. Table 4 also provides details behind CPE's calculation of its proposed CCRA rate of \$0.1885 per Dth.

Table 4. Calculation of the Company's Proposed CCRA Rate²⁹

Line	Description	Time Period	Amount
1	Beginning Balance	October 1, 2025	(\$3,869)
2	ECO Expenses	October 2025-December 2026	\$88,748,034
3	2024 DSM Financial Incentive	Approved in 2025 for 2024 Activities	\$7,942,034
4	2025 DSM Financial Incentive	Approved in 2026 for 2025 Activities	\$6,600,000
5	Carrying Charges	October 2025-December 2026	(\$29,310)
6	ECO Expenses Subtotal [Line 1 + Line 2 + Line 3 + Line 4 + Line 5]	October 2025-December 2026	\$103,256,889
7	CCRC Recovery	October 2025-December 2026	(\$66,473,449)
8	Remaining Amount to be Recovered Through CCRA [Line 6 + Line 7]	October 2025-December 2026	\$36,783,440
9	Projected Sales (Dth)	October 2025-December 2026	195,108,454
10	Proposed CCRA Rate (\$/Dth) [Line 8/Line 9]	Effective October 1, 2025	\$0.1885
11	Forecasted Balance	December 31, 2026	\$5,496

CPE's CCRA would ideally be set at a rate that brings the Company's ECO tracker balance as close to zero as possible. Doing so avoids significant over or under recovery of ECO costs by the Company, thus minimizing carrying charges and stabilizing CCRA rates.

Reviewing the data in the Petition's Attachments C-1 and C-2, the Department concludes the proposed CCRA factor will bring the ECO tracker closer to zero by the end of 2026 and therefore is reasonable.

The Department reviewed the calculation of CPE's proposed CCRA rate of \$0.1885 per Dth and concludes it is accurate. The Department recommends the Commission approve the proposed CCRA of \$0.1885 per Dth to be effective October 1, 2025.

E.2. Customer Notification Method for the CCRA Proposal

In addition to updating the relevant tariff sheet, the Department recommends that the Commission approve the Company's proposed bill message in the billing month immediately following the date of the Commission's Order:

²⁹ Data in Table 4 retrieved from Petition, Attachment C-1 and C-2.

The PUC has approved a Conservation Cost Recovery Adjustment (CCRA) factor of \$0.01885 per therm. This charge will be used to fund energy conservation activities and has been added to your delivery charge. For more information, please call or visit our website.

As noted in Section 3, page 86 of the Petition, “a phone number and website address are not included in this bill message. If a customer has questions, the phone number and website address they should contact already appears near the bill message on the customer’s bill.”

F. HISTORICAL ECO ACHIEVEMENTS AND SHARED SAVINGS INCENTIVES

In Table 5, the Department examined energy savings, expenditures, and incentive values for select years. The Department observes that the Company’s energy savings and financial incentive decreased from 2023 to 2024 and also when comparing 2024 to the Company’s 2022-2024 average savings and incentive figures, but CPE’s expenditures increased.

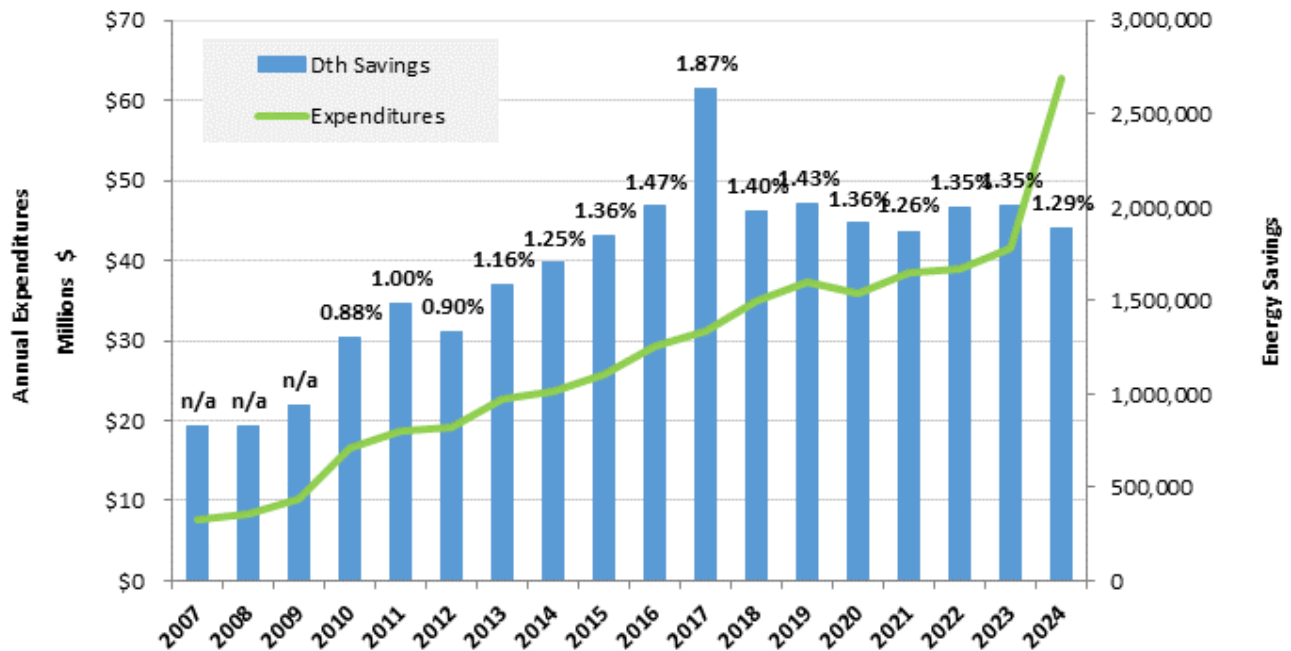
In Figure 1, the Department also provides a more comprehensive summary of the Company’s ECO performance over time. The Department finds that the Company continues to make impressive progress toward its ECO savings achievements.

Table 5: Savings, Expenditures, and Incentives for Select Years³⁰

	Energy Savings (Dth)	Expenditures	Shared Savings Incentive
2024	1,890,592	\$62,705,528	\$7,942,034
2023	2,009,051	\$41,484,184	\$8,450,662
2022	2,003,321	\$40,041,875	\$7,673,591
Average 2022-2024	1,967,655	\$48,077,196	\$8,022,096
Compare 2024 to 2023	-5.90%	51.16%	-6.02%
Compare 2024 to Avg 2022-2024	-3.92%	30.43%	-1.00%

³⁰ Data reflects savings and expenditures used to calculate the financial incentive and thus does not include savings and spending due to specific programs that were excluded from the financial incentive calculation.

Figure 1. Historical ECO Performance



IV. DEPARTMENT RECOMMENDATIONS

The Department reviewed the Company's Petition and concluded that it is generally reasonable. Based on analysis of the Petition and the information in the record, the Department has prepared recommendations, which are provided below. The Department is available to answer any questions the Commission may have.

A. RECOMMENDATIONS TO THE COMMISSION

- A.1. Approve a performance incentive of \$7,942,034 for 2024 ECO activities.
- A.2. Approve CPE's 2024 ECO tracker account, as summarized in Table 3 above, resulting in a December 31, 2024, tracker balance of \$23,652,462.
- A.3. Approve a Conservation Cost Recovery Adjustment rate of \$0.1885 per Dth to be effective October 1, 2025, or the first month following the Commission's Order in this proceeding.
- A.4. Approve the Company's proposed bill message in the billing month immediately following the date of the Commission's Order:

The PUC has approved a Conservation Cost Recovery Adjustment (CCRA) factor of \$0.01885 per therm. This charge will be used to fund energy conservation activities and has been added to your delivery charge. For more information, please call or visit our website.

- A.5. Require CPE to submit a compliance filing, within 10 days of the issue date of the Order in the present docket, with revised tariff sheets reflecting the Commission's determinations in this matter.

August 14, 2025

Mike Bull
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. G004/M-25-44

Dear Mr. Bull:

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

*Great Plains Natural Gas Company's ECO Tracker and Shared Savings DSM
Incentive (Petition)*

The Petition was filed by Great Plains Natural Gas Company on May 1, 2025.

The Department recommends that the Minnesota Public Utilities Commission (Commission) approve Great Plains Natural Gas Company's Petition. The Department is available to answer any questions that the Commission may have in this matter.

Sincerely,

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



Before the Minnesota Public Utilities Commission

Comments of the Minnesota Department of Commerce

Docket No. G004/M-25-44

I. INTRODUCTION

On May 1, 2025, Great Plains Natural Gas Company (GP or the Company) submitted its Petition with the Commission in Docket No. G004/M-25-44. In its Petition, the Company requests that the Commission approve:

- 2024 ECO tracker account, resulting in a December 31, 2024, tracker balance of \$104,528.
- Conservation Cost Recovery Adjustment (CCRA) of \$0.0924 /Dth to be effective September 1, 2025.

The Petition also contains the Company's 2024 Energy Conservation and Optimization (ECO) Status Report (Status Report). The Status Report is intended to fulfill the requirements of the Department's annual ECO reporting rules contained in Minnesota Rules part 7690.0550. Since the Company's Status Report does not require Commission approval, this portion of the Petition has been assigned to a separate docket.¹

II. PROCEDURAL BACKGROUND

May 1, 2025	The Company submitted its Petition with the Commission.
May 19, 2025	The Commission posted a Corrected Notice of Comment Period for the Petition.
July 28, 2025	The Department filed a request for variance extension, requesting an additional 14 days to complete its analysis and file comments.
July 28, 2025	The Commission granted the request for extension.

Topics open for comment:

- Should the Commission approve GPNG's proposed 2024 ECO Tracker account, resulting in a year-end balance of \$104,528?
- Should the Commission approve GPNG's proposed CCRA Factor of \$0.0934 per dekatherm, to be implemented on September 1, 2025?²
- Are there other issues or concerns related to this matter?

¹ See Docket No. G004/CIP-23-97

² The Department notes that there appears to be a typo in the CCRA factor included in the Commission's May 19, 2025, "Notice of Comment Period" filing. The Company's Petition appears to request a CCRA equal to \$0.0924/Dth.

III. DEPARTMENT ANALYSIS

The Department's analysis of the Company's Petition is provided below in the following sections:

- A. Commission's Order from the Previous Year
- B. Minnesota's Energy Conservation and Optimization Statute
- C. Proposed 2024 ECO Tracker
- D. Proposed Conservation Cost Recovery Adjustment
- E. Historical ECO Achievements and Shared Savings Incentives

A. COMMISSION'S ORDER FROM THE PREVIOUS YEAR

On November 8, 2024, the Commission issued its Order approving GP's 2023 Conservation Improvement Program Consolidated Filing,³ with the following determinations:

1. Approved Great Plains Natural Gas Company's 2023 DSM financial incentive of \$278,241 and CIP tracker account, resulting in a 2023 CIP tracker year-end balance of (\$401,172).
2. Approved a CCRA rate of \$0.0202 per Dth to be effective the first billing cycle after the Commission's determination in this matter.
3. Required Great Plains Natural Gas Company to include the following bill message in the billing month immediately following the date of the Order in the current docket: Great Plains recovers the cost changes in its energy conservation programs from the base established in 2021 through a Conservation Cost Recovery Adjustment (CCRA) subject to MN Public Utilities Commission approval. A CCRA of [insert rate] per dk is effective [insert effective date]. Learn more about reducing your energy use by visiting our website at www.gpng.com or calling us at 1-877-267-4764.
4. Required Great Plains Natural Gas Company to submit a compliance filing, within 10 days of the issue date of the Order in the present docket, with revised tariff sheets reflecting the Commission's determinations in this matter.

B. MINNESOTA'S ENERGY CONSERVATION AND OPTIMIZATION STATUTE

In 2021, the Minnesota Legislature passed the Energy Conservation and Optimization Act (ECO Act).⁴ The ECO Act primarily serves to modernize what was the Conservation Improvement Program (CIP) to provide a more holistic approach to energy efficiency programming. Notable highlights of the ECO Act include:

³ See Commission's November 8, 2024, Order in Docket No. G-004/M-24-44

⁴ https://www.revisor.mn.gov/bills/text.php?number=HF164&type=bill&version=2&session=ls92&session_year=2021&session_number=0

- Providing participating electric and natural gas utilities the opportunity to optimize energy use and delivery through the inclusion of load management⁵ and efficient fuel-switching (EFS) programs.⁶
- Raising the energy savings goals for the state's electric investor-owned utilities (IOUs).⁷
- More than doubling the low-income spending requirement for all IOUs.⁸
- Providing greater planning flexibility for participating municipal and cooperative utilities.⁹
- Including activities to improve energy efficiency for public schools.¹⁰

Minn. Stat. § 216B.241 (ECO Statute) provides the framework for IOU ECO programs that deliver energy savings, load management programs, and EFS measures. This includes annual savings goals, which are determined as a percentage of the most recent three-year average of gross retail sales after subtracting sales to ECO-exempt customers.¹¹ 2024-2026 is the first program year period where requirements from the ECO Act take effect for the IOUs' ECO programs.

The ECO Statute grants jurisdiction to the Department over most of the state's ECO program regulatory activities. The Commission continues to have jurisdiction over two specific conservation items relevant to this proceeding: the Shared Savings DSM Financial Incentive and the recovery of ECO costs.

The Department has regulatory oversight in reviewing and approving utility plans and performance,¹² determining cost-effectiveness methodologies¹³, and the overall administration of the ECO framework.¹⁴ Utilities are also allowed to recover costs incurred from delivering ECO programs approved by the Department,¹⁵ which are recovered through a tracker account reviewed and approved annually by the Commission.¹⁶ Finally, the Commission can approve incentive plans encouraging utility success through ECO programs provided the plans meet certain statutory requirements.¹⁷ The Commission has approved Shared Savings DSM Financial Incentive mechanisms for each three-year Triennial Plan since 2010 through Docket No. E,G-999/CI-08-133,¹⁸ and approves annual financial incentives through the ECO tracker account proceedings.¹⁹

⁵ Minn. Stat. § 216B.241, subd. 13.

⁶ Minn. Stat. § 216B.2403, subd. 8.

⁷ Minn. Stat. § 216B.241, subd. 1c(b).

⁸ Minn. Stat. § 216B.241, subd. 7(a).

⁹ Minn. Stat. § 216B.2403, subd. 3.

¹⁰ Minn. Stat. §§ 216B.2403, subd 3(j) and 216B.241, subd. 2(i).

¹¹ Minn. Stat. § 216B.241, subd. 1c.

¹² Minn. Stat. § 216B.241 Subd. 2 et seq

¹³ Minn. Stat. § 216B.241 Subd. 1c(e)

¹⁴ Minn. Stat. § 216B.241, 216B.2402, 216B,2403 and Minn. Rules 7690

¹⁵ Minn. Stat. § 216B.241, subd. 2b.

¹⁶ Minn. Stat. § 216B.16, subd. 6b.

¹⁷ Minn. Stat. § 216B.16, subd. 6c.

¹⁸ Commission Order Establishing Utility Performance Incentives for Energy Conservation, January 27, 2010, Docket Number E,G-999/CI-08-133.

¹⁹ See Commission Orders in Docket Numbers G-008/M-24-43, G-004/M-24-44, G-022/M-24-45, G-011/M-24-46, G-002/M-24-47, E-015/M-24-48, E-017/M-24-49, and E-002/M-24-50.

C. PROPOSED 2024 ECO TRACKER

In its Petition, the Company requested approval of its report on recoveries and expenditures included in the Company's ECO tracker account. This activity can be found in Attachment D of the utility's Petition and is summarized below in Table 1.

Table 1: Summary of 2024 ECO Tracker Account

Line	Description	Time Period	Amount
1	Beginning Balance	Jan. 1, 2024	(\$401,172)
2	ECO Expenses ²⁰	Jan. 1 2024 – Dec. 31, 2024	\$679,534
3	DSM Financial Incentive	Approved in 2024 for 2023 Activities	\$278,241
4	Carrying Charges	Jan. 1 2024 – Dec. 31 2024	(\$13,943)
5	ECO Expenses Subtotal [Line 1 + Line 2 + Line 3 + Line 4]	Jan. 1 2024 – Dec. 31 2024	\$542,660
6	CCRC Recovery	Jan. 1 2024 – Dec. 31, 2024	\$491,272
7	CCRA Recovery	Jan. 1 2024 – Dec. 31, 2024	(\$53,140)
8	ECO Revenues Subtotal [Line 6 + Line 7]	Jan. 1 2024 – Dec. 31, 2024	\$438,132
9	Ending Balance [Line 5 – Line 8]	Dec. 31, 2024	\$104,528

The Company calculated carrying charges using the short-term cost of debt rate, which was approved in Great Plains' most recent rate case in Docket No. G004/GR-19-511. The annual short-term debt rate is 3.693 percent, which when divided by 12 months, results in the 0.30775 percent monthly carrying rate applied by the Company to the ECO tracker for each month in 2024.

The Department reviewed the ECO tracker and found no calculation errors. The Department recommends the Commission approve GP's 2024 ECO tracker account as summarized in Table 1, resulting in an ending balance of \$104,528.

D. PROPOSED CONSERVATION COST RECOVERY ADJUSTMENT

Minnesota Statutes 2016B.16., Subd. 6b(c) states that the Commission "may permit a public utility to file rate schedules providing for annual recovery of the costs of energy conservation improvements." This ECO recovery mechanism is generally referred to as the Conservation Cost Recovery Adjustment (CCRA).

²⁰ GP reported \$957,775 in total expenses on page 2 of Attachment D. On page 4 of Attachment D, GP noted that the total expenses figure included \$278,241 in the 2023 DSM incentive amount. The Department reports the DSM Financial Incentive amount separately in Table 3 and has netted it out of the ECO Expenses row.

D.1. CCRA Proposal

In its Petition, the Company reported an ECO tracker balance of \$104,528 at the end of the 2024 calendar year. GP has requested approval for a revised CCRA rate of \$0.0924 per Dth, which translates to a \$0.0722 increase from the current CCRA of \$0.0202 per Dth.

If the proposed rate were to be effective September 1, 2025 as proposed, the Company's year-end 2025 tracker balance would be \$308,741, as shown in Table 2.

Table 2: Projected 2025 ECO tracker account, using the current CCRA and CCRC rates (April-December values estimated)²¹

Line	Description	Time Period	Amount
1	Beginning Balance	Jan. 1, 2025	\$104,528
2	ECO Expenses	Jan. 1, 2025 – Dec. 31, 2025	\$1,021,034
3	DSM Financial Incentive	Approved in 2025 for 2024 activities	\$0
4	Carrying Charges	Jan. 1, 2025 – Dec. 31, 2025	\$2,935
5	ECO Expenses Subtotal [Line 1 + Line 2 + Line 3 + Line 4]	Jan. 1, 2025 – Dec. 31, 2025	\$1,128,497
6	CCRC Recovery	Jan. 1, 2025 – Dec. 31, 2025	\$522,963
7	CCRA Recovery	Jan. 1, 2025 – Dec. 31, 2025	\$296,793
8	ECO Revenues Subtotal [Line 6 + Line 7]	Jan. 1, 2025 – Dec. 31, 2025	\$819,756
9	Ending Balance [Line 5 - Line 8]	Dec. 31, 2025	\$308,741

Table 3 provides details behind Great Plains' calculation of its proposed CCRA rate of \$0.0924. As shown in Table 3, the proposed rate was derived by assuming a CCRA recovery of \$575,415 over a 12-month period from September 1, 2025 to August 31, 2026, with 6,230,517 Dth in sales.²² As stated on page 16 of the Petition, as a result of the requested CCRA increase, "For a typical residential customer using 77.1 dk per year, this reflects an increase of \$5.57 annually or \$0.46 per month."

²¹ Data in Table 2 retrieved from Petition, Attachment D.

²² See Petition, Attachment D for these figures.

Table 3. Calculation of the Company's Proposed CCRA Rate

Line	Description	Time Period	Amount
1	Beginning Balance	Sept. 1, 2025	\$58,089
2	ECO Expenses	Sept. 1, 2025 – Aug. 31, 2026	\$1,022,899
3	DSM Financial Incentive	Approved in 2025 for 2024 Activities	\$0
4	Carrying Charges	Sept. 1, 2025 – Aug. 31, 2026	\$4,082
5	ECO Expenses Subtotal [Line 1 + Line 2 + Line 3 + Line 4]	Sept. 1, 2025 – Aug. 31, 2026	\$1,085,070
6	CCRC Recovery	Sept. 1, 2025 – Aug. 31, 2026	\$509,655
7	Remaining Amount to be Recovered through CCRA [Line 5 – Line 6]	Sept. 1, 2025 – Aug. 31, 2026	\$575,415 ²³
8	Projected Sales (Dth)	Sept. 1, 2025 – Aug. 31, 2026	6,230,517
9	Proposed CCRA Rate (\$/Dth) [Line 7/Line 8]	Effective Sept. 1, 2025	\$0.0924

GP's CCRA would ideally be set at a rate that brings the Company's ECO tracker balance as close to zero as possible. Doing so avoids significant over or under recovery of ECO costs by the Company, thus minimizing carrying charges and stabilizing CCRA rates.

After observing the Company's relatively high ECO tracker balances over several earlier years, in 2016 the Department recommended Great Plains use a forward-looking rather than backward-looking methodology to calculate the Company's CCRA.²⁴ Using a forward-looking methodology helps maintain an ECO tracker balance closer to zero, minimize carrying charges, and account for ECO expense fluctuations. The Commission agreed with the Department's recommendations and directed the Company "to calculate the CCRA based on the existing tracker balance, as well as the projected sales, expenditures, financial incentive(s), and any pertinent adjustments that may occur over the period the CCRA will be in place."²⁵ Although the ECO tracker balance still fluctuates year to year, a certain degree of this is to be expected.

Based on the analysis presented above, the Department supports the Company's proposal to implement a CCRA rate of \$0.0924.

D.2. Customer Notification Method for the CCRA Proposal

In addition to updating the relevant tariff sheet, the Department recommends that the Commission require the Company to include the following bill message in the billing month immediately following the date of the Commission's Order:

²³ This ties to the Company's CCRA recovery of \$575,700 and forecasted ending balance on August 31, 2026 of (\$285), as shown on Attachment D, page 3.

²⁴ See Department's [Comments](#) in Docket No. G004/M-16-384.

²⁵ Commission [Order](#) in Docket No. G004/M-16-384, Item 6.

Great Plains recovers the cost change in its energy conservation programs, from the base established in our most recent general rate case, through a Conservation Cost Recovery Adjustment (CCRA) subject to MN Public Utilities Commission approval. A CCRA of [insert rate] per dk, as shown in the Resource Adjustment above, is effective [insert date]. Learn more about reducing your energy use by visiting our website at www.gpng.com or calling us at 1-877-267-4764.

E. *HISTORICAL ECO ACHIEVEMENTS AND SHARED SAVINGS INCENTIVES*

In Table 4, the Department examined energy savings, expenditures, and incentive values for select years. The Department observes that the Company’s ECO energy savings, expenditures, and financial incentive decreased from 2023 to 2024 and when comparing 2024 to the Company’s 2022-2024 average savings, expenditures, and incentive figures.

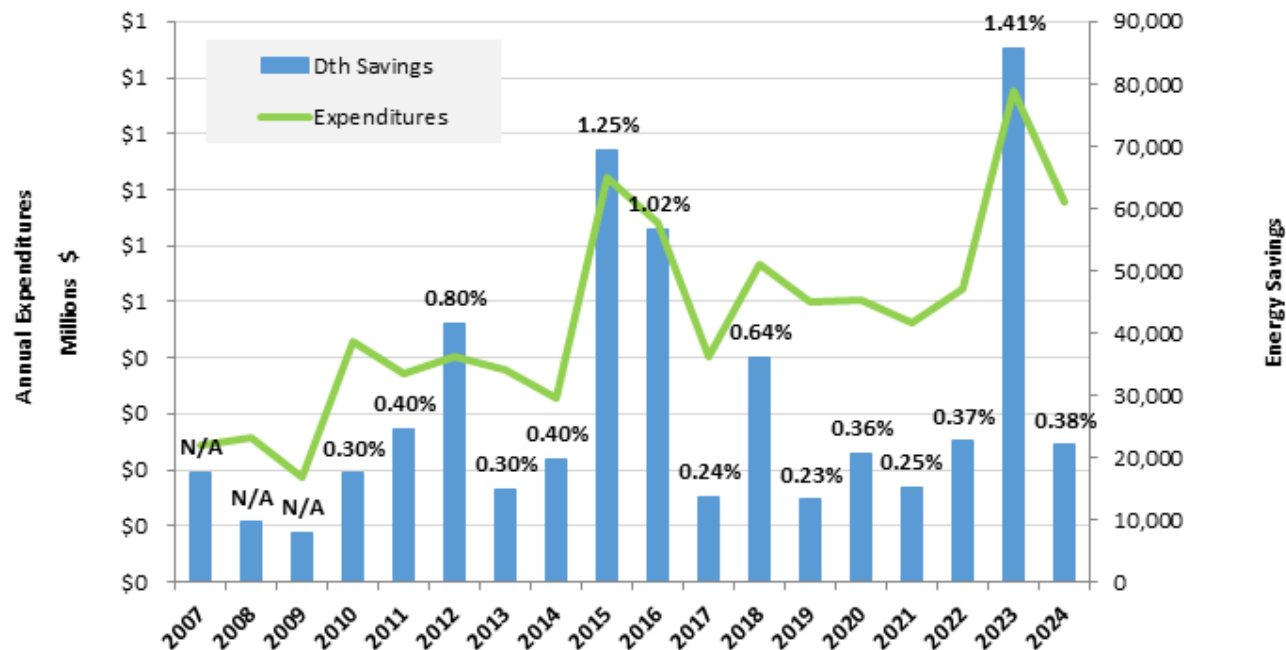
In Figure 1, the Department also provides a more comprehensive summary of the Company’s ECO performance over time.

Table 4: Savings, Expenditures, and Incentives for Select Years²⁶

	Energy Savings (Dth)	Expenditures	Shared Savings Incentive
2024	21,972	\$678,201	\$0
2023	85,711	\$877,986	\$278,241
2022	22,575	\$523,005	\$0
Average 2022-2024	43,419	693,064	92,747
Compare 2024 to 2023	-74.37%	-22.75%	-100.00%
Compare 2024 to Avg 2022-2024	-49.40%	-2.14%	-100.00%

²⁶ Data reflects savings and expenditures used to calculate the financial incentive, and thus does not include savings and spending due to specific programs that were excluded from the financial incentive calculation.

Figure 1. Historical ECO Performance



IV. DEPARTMENT RECOMMENDATIONS

The Department reviewed the Company’s Petition and concluded that it is generally reasonable. Based on analysis of the Petition and the information in the record, the Department has prepared recommendations, which are provided below. The Department is available to answer any questions the Commission may have.

A. RECOMMENDATIONS TO THE COMMISSION

- A.1. Approve the Company’s 2024 ECO tracker account, as summarized in Table 1 of these Comments, resulting in a 2024 ECO tracker year-end balance of \$104,528;
- A.2. Approve a CCRA rate of \$0.0924 per Dth, to be effective September 1, 2025, or the first billing cycle after the Commission’s determination in this matter;
- A.3. If the proposed CCRA rate is approved, require GP to include the following bill message in the billing month immediately following the date of the Order in the current docket:
 - Great Plains recovers the cost changes in its energy conservation programs, from the base established in our most recent general rate case, through a Conservation Cost Recovery Adjustment (CCRA) subject to MN Public Utilities Commission approval. A CCRA of [insert rate] per dk as shown in the Resource Adjustment above is effective [insert date]. Learn more about reducing your energy use by visiting our website at www.gpng.com or calling us at 1-877-267-4764.
- A.4. Require GP to submit a compliance filing, within 10 days of the issue date of the Order in the present docket, with revised tariff sheets reflecting the Commission’s determinations in this matter.

August 1, 2024

Will Seuffert
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
Saint Paul, Minnesota 55101-2147

RE: **Comments of the Minnesota Department of Commerce, Division of Energy Resources**
Docket No. G022/M-24-45

Dear Mr. Seuffert:

Attached are the Comments of the Minnesota Department of Commerce, Division of Energy Resources (Department), in the following matter:

Greater Minnesota Gas, Inc.'s Petition for Approval of 2023 Energy Conservation and Optimization Program Tracker Account and Proposed Conservation Cost Recovery Adjustment (*Petition*)

The *Petition* was filed on June 5, 2024 by:

Kristine A. Anderson
Corporate Attorney
Greater Minnesota Gas, Inc.
1900 Cardinal Lane
Faribault, MN 55021

The Department recommends that the Minnesota Public Utilities Commission (Commission) **approve Greater Minnesota Gas's *Petition***. The Department is available to answer any questions that the Commission may have in this matter.

Sincerely,

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

Attachment



Before the Minnesota Public Utilities Commission

Comments of the Minnesota Department of Commerce

Division of Energy Resources

Docket No. G022/M-24-45

I. SUMMARY OF THE UTILITY'S PROPOSAL

On June 5, 2024, Greater Minnesota Gas, Inc. (GMG or the Company) submitted its Petition for Approval of 2023 Energy Conservation and Optimization (ECO) Program Tracker Account and Proposed Conservation Cost Recovery Adjustment (*Petition*) with the Minnesota Public Utilities Commission (Commission) in Docket No. G022/M-24-45. In its *Petition*, GMG requested that the Commission approve:

- A 2023 ECO program tracker with a year-end balance of \$415,344; and
- A 2024 Conservation Cost Recovery Adjustment (CCRA) of \$0.4407 per dekatherm (Dth), effective on the first day of the month following approval.

The Company also noted its intent to update the previously approved bill message language, revised to reflect the new CCRA, for inclusion with bills in the month immediately following approval.

II. COMMISSION'S 2021 ORDER

On October 22, 2021, the Commission issued its Order approving GMG's 2020 Conservation Improvement Program (CIP) Tracker Account and Conservation Cost Recovery Adjustment,¹ with the following determinations:

1. Approved GMG's 2020 Conservation Improvement Program tracker account, as summarized in Table 1 of the comments of the Minnesota Department of Commerce, with a December 31, 2020 tracker balance of (\$15,200);
2. Approved the implementation of a Conservation Cost Recovery Adjustment of \$0.1965 per dekatherm, effective January 1, 2022;
3. Approved GMG's proposed bill message;
4. Required GMG to submit a filing within 10 days with revised tariff sheets reflecting the Commission's determination in this matter.

On October 22, 2021, GMG submitted its compliance tariff sheets in response to Order Point 4.

¹ See the Commission's October 22, 2021 Order in Docket No. G022/M-21-306.

III. DEPARTMENT ANALYSIS

The Department's analysis of GMG's *Petition* is provided below in the following sections:

- In Section III.A, a review of Minnesota's updated conservation statutes;
- In Section III.B, GMG's proposed reconciliation for its 2023 ECO tracker account;
- In Section III.C, GMG's proposed CCRA for 2024/2025;
- In Section III.D, GMG's historical performance;
- In Section III.E, GMG's proposed bill message.

A. MINNESOTA'S UPDATED CONSERVATION STATUTES

In 2021, the Minnesota Legislature passed the Energy Conservation and Optimization (ECO) Act. This act updated Minnesota's existing "CIP" Statutes, which have since become known as the "ECO" statutes. Subsequently, the state's Conservation Improvement Program (CIP) was re-branded as the state's Energy Conservation and Optimization (ECO) program. As a result, GMG's triennial filing governing the 2021-2023 years was considered a "CIP" Triennial Filing (Docket No. G022/CIP-20-474) and GMG's most recent triennial filing covering years 2024-2026 was considered its first "ECO" Triennial Filing (Docket No. G022/CIP-23-96).

The ECO Statutes impacting Investor-Owned Utilities are as follows:

- Minnesota Statutes § 216B.2401 (Energy Savings and Optimization Policy Goal);
- Minnesota Statutes § 216B.2402 (Definitions);
- Minnesota Statutes § 216B.241 (Public Utilities; Energy Conservation and Optimization);
- Minnesota Statutes § 216B.2411 (Distributed Energy Resources); and
- Minnesota Statutes § 216B.2412 (Decoupling of Energy Sales from Revenues).

The Department has reviewed the ECO Statutes for any changes that potentially impact the Commission. As under the former CIP Statutes, the ECO Statutes grant jurisdiction to the Department for most of the state's conservation activities. However, the Commission continues to have jurisdiction over two specific conservation items relevant to these Comments: the financial incentive and the recovery of ECO (formerly CIP) costs. The Department found no substantive changes to those sections concerning the Commission's authority that would impact this proceeding.

Therefore, the Department has determined that its current review of GMG's *Petition* can proceed as it has in past years.

B. GMG'S PROPOSED 2023 ECO TRACKER ACCOUNT

In its *Petition*, GMG requested approval of its report on recoveries and expenditures included in the Company's ECO tracker account balance during 2023. Activity in GMG's ECO tracker account during 2023 can be found in Attachment A of the utility's *Petition*.

The most recent Commission Order regarding GMG's ECO tracker account approved the account balance as of December 31, 2020.² GMG's *Petition* did not include the actual tracker account data for 2021 and 2022. The Department requested this information from the Company to be able to reconcile the 2023 tracker account. Absent the 2021 and 2022 data, the Department would be unable to determine if the beginning balance used in the Company's 2023 tracker is accurate. The Company provided the tracker account data for 2021 and 2022, which the Department has included with these comments as Attachment 1. The Department incorporates the 2021 and 2022 data into the reconciliation below.

The Company's ECO tracker account balance for the years 2021, 2022, and 2023 is summarized below in Department Table 1.

Department Table 1: A Summary of GMG's 2021-2023 ECO Tracker Account

Line	Description	Time Period	Amount
1	Beginning Balance	January 1, 2021	(\$15,200)
2	ECO Expenses	January 1, 2021 – December 31, 2023	\$1,365,396
3	DSM Financial Incentive	Approved in 2021 – 2023	\$0
4	Carrying Charges	January 1, 2021 – December 31, 2023	\$0
5	ECO Expenses Subtotal [Line 1 + Line 2 + Line 3 + Line 4]	January 1, 2021 – December 31, 2023	\$1,350,196
6	CCRC Recovery	January 1, 2021 – December 31, 2023	(\$230,781)
7	CCRA Recovery	January 1, 2021 – December 31, 2023	(\$704,072)
8	ECO Revenues Subtotal [Line 6 + Line 7]	January 1, 2021 – December 31, 2023	(\$934,853)
9	Ending Balance [Line 5 + Line 8]	December 31, 2023	\$415,344

The Department reviewed Attachment A of the *Petition*, along with the 2021 and 2022 data provided by the Company and included with these comments as Attachment 1, and concludes that the Company correctly calculated its 2021, 2022, and 2023 ECO Tracker account. Therefore, the Department recommends the Commission approve GMG's 2021, 2022, and 2023 ECO tracker, resulting in a December 31, 2023 balance of \$415,344.

² See the Commission's October 22, 2021 Order in Docket No. G022/M-21-306.

The Department requests that in future years, the Company provide the ECO tracker for each year since the most recently approved year-end balance (in this case, for year 2023) and provide the tracker in an Excel spreadsheet with all formula intact.

C. GMG'S PROPOSED UPDATED CCRA

The Commission approved GMG's current CCRA of \$0.1965 per dekatherm on October 22, 2021 in Docket No. G022/M-21-306. In its *Petition*, GMG proposed to increase its CCRA from \$0.1965/Dth to \$0.4407/Dth effective on the first day of the month following approval. GMG states that its CCRA is based on a forward-looking calculation targeting a \$0 tracker balance as of December 31, 2025.³

The projected effects of the current and proposed CCRA's to the 2024 and 2025 ECO trackers are shown below in Table 2. GMG's projections assume the proposed CCRA of \$0.4407/Dth is effective September 1, 2024.

Department Table 2: Summary of GMG's 2024-2025 Projections with a CCRA rate of \$0.1965/Dth until August 31, 2024 and \$0.4407/Dth effective September 1, 2024⁴

Line No.	Description	Jan 2024 - Aug 2024	Sep 2024 - Dec 2024	2025
1	Beginning Balance (\$)	\$415,344	\$480,774	\$350,414
2	ECO Expenditures (\$)	\$319,196	\$184,454	\$503,650
3	ECO-Applicable Sales (Dth)	1,067,141	653,129	1,771,877
4	Base Rate (CCRC) (\$/Dth)	\$0.0413	\$0.0413	\$0.0413
5	Base Rate Recoveries (\$) [Line 3 * Line 4 * -1]	(\$44,073)	(\$26,974)	(\$73,179)
6	CCRA (\$/Dth)	\$0.1965	\$0.4407	\$0.4407
7	CCRA Recoveries (\$) [Line 3 * Line 6 * -1]	(\$209,693)	(\$287,840)	(\$780,866)
8	Ending Balance (\$) [Line 1 + Line 2 + Line 5 + Line 7]	\$480,774	\$350,414	\$19

In the Department's comments from GMG's most recent CCRA proceeding, in docket G022/M-21-306, the Department suggested that GMG may wish to implement its proposed CCRA sooner than the beginning of the next calendar year.⁵ GMG's proposal in the current docket is in line with the Department's suggestion, in that the Company requested approval for its new CCRA effective on the first day of the month following approval. The Department continues to support this approach.

The Company stated its intent to file an updated tracker with actual expenditures for 2024 due to the potential for the actual tracker balance to vary from projections.⁶ The Department supports this

³ *Petition* at 2.

⁴ GMG used actual values for January – May 2024 and projected values thereafter.

⁵ See the Department's July 1, 2021 comments in docket G022/M-21-306 at 3.

⁶ *Petition* at 3.

approach and suggests that on an annual basis GMG file its ECO tracker account and request adjustment of its CCRA, if appropriate, to avoid large account balances and resulting large adjustments to the CCRA.

The Department reviewed GMG's proposed CCRA and its projections for the ECO tracker through 2025 based on its proposed CCRA. The Department concludes that GMG's calculations are correct and the proposed CCRA is reasonable. The Department recommends the Commission approve GMG's proposed CCRA of \$0.4407/Dth.

The Department requests that in future years, the Company also provide its two years of projected trackers in an Excel spreadsheet with all formula intact.

D. GMG'S HISTORICAL PERFORMANCE

The Department provides below a historical comparison of GMG's ECO activities from 2010 through the Company's proposed 2023 figures. This table shows how the Company's ECO expenditures, year-end tracker balances, and first year energy savings have changed over time. Unlike other utilities, GMG has not implemented a Demand Side Management (DSM) Shared Savings Incentive or ECO tracker carrying charges.

Department Table 3: GMG Summary ECO Statistics, 2010-2023

Year	Dept ECO Review Docket No.	PUC ECO Tracker and CCRA Review Docket No.	ECO Expenses (Approved by Department Deputy Commissioner)	ECO Tracker Year End Balance (Approved by Commission)	First Year Energy Savings (Approved by Department Deputy Commissioner)	First Year Savings as Percentage of Retail Sales (Approved by Department Deputy Commissioner)
2010	09-968.01	n/a	\$20,323	n/a	1,711	0.43%
2011	09-968.02	n/a	\$16,835	n/a	1,568	0.39%
2012	09-968	n/a	\$31,068	n/a	1,926	0.48%
2013	12-690.01	n/a	\$86,088	n/a	4,155	0.90%
2014	12-690.02	n/a	\$100,725	n/a	5,157	1.14%
2015	12-690.03	16-494	\$109,114	\$178,160	6,810	1.51%
2016	12-690.04	16-494	\$116,816	\$270,706	9,426	2.09%
2017	16-118.01	19-633	\$137,267	\$106,292	5,398	0.48%
2018	16-118.02	19-633	\$204,213	-\$89,196	12,137	1.18%
2019	16-118.03	20-458	\$245,781	-\$247,725	12,809	1.25%
2020	16-118.04	21-306	\$287,639	-\$15,200	10,563	1.03%
2021	20-474	24-45	\$389,912	\$306,094	14,460	0.84%
2022	20-474	24-45	\$551,085	\$464,864	17,469	1.01%
2023 (proposed)	20-474	24-45	\$401,205	\$415,344	12,498	0.72%

The Department notes that GMG's ECO spending and savings have increased significantly during this time period. The Department notes:

- From 2010 to 2023, GMG's savings increased 630 percent and spending increased 1,874 percent;
- From the 2010-2012 three-year time period to the 2021-2023 three-year time period, average savings increased 754 percent (from 1,735 Dth in 2010-2012 to 14,809 Dth in 2021-2023) and average spending increased 1,867 percent (from \$22,742 in 2010-2012 to \$447,401 in 2021-2023);
- GMG did not meet its 1.00 percent savings as a percentage of ECO-applicable retail sales goal in 7 years between 2010 and 2023.

These figures are shown in the following table:

Department Table 4: Savings and Spending Growth for GMG, 2010-2023 Select Years

	Savings (Dth)	Spending
2010	1,711	\$20,323
2023	12,498	\$401,205
Percent Change	630%	1,874%
2010-2012	1,735	\$22,742
2021-2023	14,809	\$447,401
Percent Change	754%	1,867%

E. GMG'S PROPOSED BILL MESSAGE

GMG proposed to update the previously approved bill message language notifying customers of the increase in the CCRA. The Company intends to update the language for inclusion with bills in the month immediately following a Commission Order. GMG's proposed updated languages reads:

Effective _____, 2024, your bill will include an adjusted Conservation Cost Recovery Adjustment (CCRA). The Minnesota Public Utilities Commission approved the CCRA on _____, 2024. The CCRA is necessary and allowed by law to fund the state-mandated Energy Conservation and Optimization Program. The CCRA is \$0.04407 per therm, or \$0.4407 per dekatherm, of natural gas that you use. If you have questions, please contact us at 1-888-931-3411 or www.greatermngas.com. Thank you.

The Department recommends approval of the updated bill message language.

III. RECOMMENDATIONS

The Department reviewed GMG's *Petition* and concludes that it is generally reasonable. The Department requests that in future filings GMG provide ECO (formerly CIP) trackers as Excel spreadsheets, with all formulae intact, covering all months from the most recently approved tracker (in this case, year 2023).

The Department recommends that the Commission:

1. Approve GMG's 2021, 2022, and 2023 ECO tracker account, as summarized in Department Table 1 above, with a December 31, 2023 tracker balance of \$415,344;
2. Approve a Conservation Cost Recovery Adjustment of \$0.4407/Dth to be effective on the first day of the month following approval;
3. Approve GMG's proposed bill message; and
4. Require GMG to submit a compliance filing, within 10 days of the issue date of the Order in the present docket, with revised tariff sheets reflecting the Commission's determinations in this matter.

[illegible]

[illegible]

August 14, 2025

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

RE: Comments of the Minnesota Department of Commerce
G011/M-25-46

Dear Mr. Bull:

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

Minnesota Energy Resources Corporation's 2024 Energy Conservation and Optimization Program Tracker Account, Demand-Side Management Financial Incentive, and Conservation Cost Recovery Adjustment Factor (Petition)

The Petition was filed by Minnesota Energy Resources Corporation on May 1, 2025.

The Department recommends that the Minnesota Public Utilities Commission (Commission) approve Minnesota Energy Resources Corporation's Petition. The Department is available to answer any questions that the Commission may have in this matter.

Sincerely,

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



Before the Minnesota Public Utilities Commission

Comments of the Minnesota Department of Commerce

Docket No. G011/M-25-46

I. INTRODUCTION

On May 1, 2025, Minnesota Energy Resources Corporation (MERC or the Company) submitted its Petition with the Commission in docket no. G011/M-25-46. In its Petition, the Company requests that the Commission approve:

- Performance incentive of \$998,125 for 2024 ECO activities.
- 2024 ECO tracker account, resulting in a December 31, 2024, tracker balance of \$50,592.
- Conservation Cost Recovery Adjustment (CCRA) of \$0.00638/therm to be effective January 1, 2026.

The Petition also contains the Company's 2024 Energy Conservation and Optimization (ECO) Status Report (Status Report). The Status Report is intended to fulfill the requirements of the Department's annual ECO reporting rules contained in Minnesota Rules part 7690.0550. Since the Company's Status Report does not require Commission approval, this portion of the Petition has been assigned to a separate docket.¹

II. PROCEDURAL BACKGROUND

May 1, 2025	The Company submitted its Petition with the Commission.
May 16, 2025	The Commission posted a Notice of Comment Period for the Petition.
May 30, 2025	The Company submitted a Correction to Estimated Bill Impacts
July 28, 2025	The Department filed a request for variance extension, requesting an additional 14 days to complete its analysis and file comments.
July 28, 2025	The Commission granted the request for extension.

Topics open for comment:

- Should the Commission approve MERC's proposed DSM Financial Incentive of \$998,125 for ECO activities in 2024?
- Should the Commission approve MERC's proposed 2024 ECO Tracker account, resulting in a year-end balance of \$50,592?
- Should the Commission approve MERC's proposed CCRA of \$0.00638 per therm for bills rendered on and after January 1, 2026?
- Are there other issues or concerns related to this matter?

¹ See Docket No. G011/CIP-23-98

III. DEPARTMENT ANALYSIS

The Department's analysis of the Company's Petition is provided below in the following sections:

- A. Commission's Order from the Previous Year
- B. Minnesota's Energy Conservation and Optimization Statute
- C. Proposed 2024 Shared Savings DSM Financial Incentive
- D. Proposed 2024 ECO Tracker
- E. Proposed Conservation Cost Recovery Adjustment
- F. Historical ECO Achievements and Shared Savings Incentives

A. COMMISSION'S ORDER FROM THE PREVIOUS YEAR

On November 8, 2024, the Commission issued its Order approving MERC's 2023 Conservation Improvement Program Tracker Account, Demand-Side Management Financial Incentive, and Conservation Cost Recovery Adjustment Factor,² with the following determinations:

- 1. Approved a 2023 DSM financial incentive of \$1,494,587 to be included in Minnesota Energy Resources Corp.'s (MERC) tracker account no sooner than the issue date of the Commission's Order in the instant docket.
- 2. Approved MERC's 2023 CIP tracker account activities with a December 31, 2023, ending balance of (\$3,070,173.82).
- 3. Approved the revised gas CCRA of \$0.01221 per therm for all of MERC's Minnesota customer classes, effective January 1, 2025, or the first billing cycle in the month following the Commission's Order, in this matter, whichever is later.
- 4. Approved MERC's customer notification message that reads as follows: Effective January 1, 2025, the CCRA (conservation cost recovery adjustment) has been revised to \$0.01221 per therm. The CCRA is an annual adjustment to true-up under-recovery or over-recovery of CIP (conservation improvement program) expenses.
- 5. Required MERC to submit a compliance filing with tariff sheets including all necessary calculations within 10 days of the issue date of this Order.

B. MINNESOTA'S ENERGY CONSERVATION AND OPTIMIZATION STATUTE

In 2021, the Minnesota Legislature passed the Energy Conservation and Optimization Act (ECO Act).³ The ECO Act primarily serves to modernize what was the Conservation Improvement Program (CIP) to provide a more holistic approach to energy efficiency programming. Notable highlights of the ECO Act include:

² See Commission's November 8, 2024 Order in Docket No. G-011/M-24-46.

³https://www.revisor.mn.gov/bills/text.php?number=HF164&type=bill&version=2&session=ls92&session_year=2021&session_number=0

- Providing participating electric and natural gas utilities the opportunity to optimize energy use and delivery through the inclusion of load management⁴ and efficient fuel-switching (EFS) programs.⁵
- Raising the energy savings goals for the state's electric investor-owned utilities (IOUs).⁶
- More than doubling the low-income spending requirement for all IOUs.⁷
- Providing greater planning flexibility for participating municipal and cooperative utilities.⁸
- Including activities to improve energy efficiency for public schools.⁹

Minn. Stat. § 216B.241 (ECO Statute) provides the framework for IOU ECO programs that deliver energy savings, load management programs, and EFS measures. This includes annual savings goals, which are determined as a percentage of the most recent three-year average of gross retail sales after subtracting sales to ECO-exempt customers.¹⁰ 2024-2026 is the first program year period where requirements from the ECO Act take effect for the IOUs' ECO programs.

The ECO Statute grants jurisdiction to the Department over most of the state's ECO program regulatory activities. The Commission continues to have jurisdiction over two specific conservation items relevant to this proceeding: the Shared Savings DSM Financial Incentive and the recovery of ECO costs.

The Department has regulatory oversight in reviewing and approving utility plans and performance,¹¹ determining cost-effectiveness methodologies¹², and the overall administration of the ECO framework.¹³ Utilities are also allowed to recover costs incurred from delivering ECO programs approved by the Department,¹⁴ which are recovered through a tracker account reviewed and approved annually by the Commission.¹⁵ Finally, the Commission can approve incentive plans encouraging utility success through ECO programs provided the plans meet certain statutory requirements.¹⁶ The Commission has approved Shared Savings DSM Financial Incentive mechanisms for each three-year Triennial Plan since 2010 through Docket No. E,G-999/CI-08-133,¹⁷ and approves annual financial incentives through the ECO tracker account proceedings.¹⁸

⁴ Minn. Stat. § 216B.241, subd. 13.

⁵ Minn. Stat. § 216B.2403, subd. 8.

⁶ Minn. Stat. § 216B.241, subd. 1c(b).

⁷ Minn. Stat. § 216B.241, subd. 7(a).

⁸ Minn. Stat. § 216B.2403, subd. 3.

⁹ Minn. Stat. §§ 216B.2403, subd 3(j) and 216B.241, subd. 2(i).

¹⁰ Minn. Stat. § 216B.241, subd. 1c.

¹¹ Minn. Stat. § 216B.241 Subd. 2 et seq

¹² Minn. Stat. § 216B.241 Subd. 1c(e)

¹³ Minn. Stat. § 216B.241, 216B.2402, 216B,2403 and Minn. Rules 7690

¹⁴ Minn. Stat. § 216B.241, subd. 2b.

¹⁵ Minn. Stat. § 216B.16, subd. 6b.

¹⁶ Minn. Stat. § 216B.16, subd. 6c.

¹⁷ Commission Order Establishing Utility Performance Incentives for Energy Conservation, January 27, 2010, Docket Number E,G-999/CI-08-133.

¹⁸ See Commission Orders in Docket Numbers G-008/M-24-43, G-004/M-24-44, G-022/M-24-45, G-011/M-24-46, G-002/M-24-47, E-015/M-24-48, E-017/M-24-49, and E-002/M-24-50.

C. *PROPOSED 2024 SHARED SAVINGS DSM FINANCIAL INCENTIVE*

C.1. *Key Parameters from the 2024-2026 Shared Savings DSM Financial Incentive Plan*

On January 25, 2024, the Commission’s Order approved the current Shared Savings DSM Financial Incentive Plan, which applies to investor-owned gas and electric utilities for savings achieved through ECO during the 2024–2026 Triennial.¹⁹ The Department’s review of the Petition’s proposed Shared Savings Financial Incentive was informed by the requirements included in the Commission’s January 25, 2024, Order.

The current incentive mechanism awards utilities a percentage of their portfolio-wide Minnesota Test net benefits depending on their first-year energy savings achievement. In 2024, the cost-effectiveness test used to calculate net benefits for purposes of the incentive mechanism switched from the Utility Cost Test to the newly developed Minnesota Test, which incorporates additional considerations when measuring cost-effectiveness, such as greenhouse gas emission reductions. The 2024–2026 incentive mechanism modified the previous 2021–2023 incentive mechanism by updating achievement goals for first-year energy savings and the corresponding percentages of net benefits awarded, partially to account for the change in cost-effectiveness tests.

Tables 1 and 2 show the range of annual first-year energy savings a utility can achieve during the 2024–2026 Triennial and the corresponding percentage of net benefits awarded for each level of first-year energy savings.

Table 1: 2024–2026 Natural Gas Incentive

First-Year Energy Savings Achievement (% of Retail Sales)	% of Net Benefits Awarded
0.7% (threshold) ²⁰	1.90%
0.8%	2.32%
0.9%	2.74%
1.0%	3.16%
1.1%	3.58%
1.2% (goal) ²¹	4.00% (cap)

¹⁹ Order Adopting Modifications to Shared Savings Demand-Side Management Financial Incentive Plan, January 25, 2024. Docket Number E,G-999/CI-08-133.

²⁰ The achievement threshold refers to the achievement level a utility must reach before they begin earning an incentive for a given metric.

²¹ The achievement goal refers to the achievement level that aligns with the maximum percentage of net benefits a utility can earn for a given metric.

Table 2: 2024–2026 Electric Incentive

First-Year Energy Savings Achievement (% of Retail Sales)	% of Net Benefits Awarded
1.5% (threshold)	1.30%
1.6%	1.90%
1.7%	2.50%
1.8%	3.10%
1.9%	3.70%
2.0%	4.30%
2.1%	4.90%
2.2% (goal)	5.50% (cap)

Incentive caps limit the total incentive each utility can earn. The 2024–2026 incentive mechanism includes two incentive caps for each utility, one based on net benefits (Net Benefits Cap) and one on portfolio expenditures (Expenditures Cap), with the incentive amount being limited to whichever cap is lower.²² For the 2024–2026 incentive, the gas Net Benefits Cap equals 4 percent of portfolio net benefits and the Expenditures Cap equals 20 percent of total portfolio expenditures. For electric utilities, the Net Benefits Cap equals 5.5 percent of portfolio net benefits and the Expenditures Cap equals 20 percent of total portfolio expenditures. For both gas and electric utilities, the Expenditures Cap increases from 20 to 25 percent if the utility achieves or surpasses the maximum first-year energy savings goal, which is 1.2 percent of average retail sales for gas utilities and 2.2 percent of average retail sales for electric utilities.

Under the ECO framework, gas utilities can include savings and net benefits from qualifying EFS programs when calculating their financial incentive, effectively treating EFS programs the same as traditional ECO programs, provided it has achieved energy savings from non-EFS programs at or above 1 percent of retail sales.²³ An electric utility cannot currently count savings or net benefits from EFS measures when calculating its overall Shared Savings DSM incentive, but a utility, the Department, or other stakeholder may propose a separate EFS incentive for approval by the Commission.²⁴

C.2. The Department’s Review of the Proposed Shared Savings DSM Financial Incentive

The Petition covers ECO activities occurring in program year 2024. The Company reported that its 2024 achievements resulted in total first-year energy savings of 395,470 Dth (approximately 0.90% of ECO-applicable retail sales), and total expenditures of \$13,163,160. To calculate the financial incentive, the Company removed costs and net benefits associated with low-income programs that are not cost-effective and from regulatory assessments. Thus, the Company reported incentive-eligible energy

²² Order Adopting Modifications to Shared Savings Demand-Side Management Financial Incentive Plan, January 25, 2024. Docket Number E,G-999/CI-08-133.

²³ Commission’s Order Adopting Modifications to Shared Savings Demand-Side Management Financial Incentive Plan, January 25, 2024, Docket Number E,G-999/CI-08-133.

²⁴ Minn. Stat. § 216B.16, subd. 6c

savings of 395,470 Dth, spending of \$10,915,936, and net benefits of \$36,342,585 for 2024 ECO activities.

Based on the terms and conditions of its approved Shared Savings DSM financial incentive plan, the Company requested recovery of a financial incentive of \$998,125. The Company's proposed incentive is equal to 2.74% (\$998,125/\$36,342,585) of the Company's 2024 calculated net benefits and 9.14% (\$998,125/\$10,915,936) of the Company's 2024 expenditures.

The Department's review indicates that the Company correctly calculated its financial incentive for 2024 ECO achievements and did not violate the Commission-approved caps. Therefore, the Department recommends that the Commission approve the Company's 2024 Shared Savings financial incentive of \$998,125.

Additionally, should the Commission find it helpful context, the Department also evaluated the broader ECO program achievements reported in the Company's Status Report. As mentioned earlier, since the Company's Status Report does not require Commission approval, this portion of the Petition has been assigned to a separate docket.²⁵ On June 23, 2025, the Department filed a Staff Proposed Decision. The Proposed Decision provides Staff's evaluation of the Status Report's compliance with Minnesota Statutes and Rules, and Staff's examination of the technical assumptions behind the Company's reported ECO performance to ensure that energy savings are cost-effective, measurable, and verifiable. On August 7, 2025, the Department's Assistant Commissioner approved the Company's Status Report achievements.

D. PROPOSED 2024 ECO TRACKER

In its Petition, the Company requested approval of its report on recoveries and expenditures included in the Company's ECO tracker account. This activity can be found in Attachment A of the utility's Petition and is summarized below in Table 3.

Table 3: Summary of 2024 ECO Tracker Account

Line	Description	Time Period	Amount
1	Beginning Balance	Jan. 1, 2024	(\$3,070,174)
2	Total ECO Expenses	Jan. 1 2024 – Dec. 31, 2024	\$13,163,160
3	DSM Financial Incentive	Approved in 2024 for 2023 Activities	\$1,494,587
4	Carrying Charges	Jan. 1 2024 – Dec. 31 2024	(\$180,440)
5	ECO Expenses Subtotal [Line 1 + Line 2 + Line 3 + Line 4]	Jan. 1 2024 – Dec. 31 2024	\$11,407,133
6	CCRC Recovery	Jan. 1 2024 – Dec. 31, 2024	\$10,793,697
7	CCRA Recovery	Jan. 1 2024 – Dec. 31, 2024	\$562,844
8	ECO Revenues Subtotal [Line 6 + Line 7]	Jan. 1 2024 – Dec. 31, 2024	\$11,356,541
9	Ending Balance [Line 5 – Line 8]	Dec. 31, 2024	\$50,592

²⁵ See Docket No. G011/CIP-23-98

The Department reviewed Attachment A of the Petition and concludes that the Company correctly calculated its 2024 ECO Tracker account. Therefore, the Department recommends the Commission approve the Company's 2024 ECO tracker, resulting in a year-end balance of \$50,592.

E. PROPOSED CONSERVATION COST RECOVERY ADJUSTMENT

Minnesota Statutes 2016B.16., Subd. 6b(c) states that the Commission "may permit a public utility to file rate schedules providing for annual recovery of the costs of energy conservation improvements." This ECO recovery mechanism is generally referred to as the Conservation Cost Recovery Adjustment (CCRA).

E.1. CCRA Proposal

The Company's current CCRA factor was approved by the Commission on November 8, 2024, with an effective date of January 1, 2025.²⁶ In MERC's Petition, the Company proposes to change the CCRA factor from the current \$0.01221 per therm to \$0.00638 per therm (representing a \$0.00583 per therm decrease) effective January 1, 2026.²⁷

If the proposed rate were to be effective beginning January 1, 2026, the Company's year-end 2026 tracker balance would be \$774²⁸, as shown in Table 4. Table 4 also provides details behind MERC's calculation of its proposed CCRA rate of \$0.00638 per therm.

Table 4. Calculation of the Company's Proposed CCRA Rate²⁹

Line	Description	Time Period	Amount
1	Beginning Balance	January 1, 2026	(\$2,163,425)
2	ECO Expenses	January 2026-December 2026	\$15,047,208
3	2024 DSM Financial Incentive	Approved in 2025 for 2024 Activities	\$998,125
4	2025 DSM Financial Incentive	Approved in 2026 for 2025 Activities	\$1,207,087
5	Carrying Charges	January 2026-December 2026	(\$116,784)
6	ECO Expenses Subtotal [Line 1 + Line 2 + Line 3 + Line 4 + Line 5]	January 2026-December 2026	\$14,972,211
7	CCRC Recovery	January 2026-December 2026	\$12,263,250
8	Remaining Amount to be Recovered Through CCRA [Line 6 - Line 7]	January 2026-December 2026	\$2,708,961
9	Projected Sales (Dth)	January 2026-December 2026	424,480,782
10	Proposed CCRA Rate (\$/Dth) [Line 8/Line 9]	Effective January 1, 2026	\$0.00638
11	Forecasted Balance	December 31, 2026	\$774

²⁶ See Commission's November 8, 2024 Order in Docket No. G-011/M-24-46.

²⁷ Petition, Page 7

²⁸ Attachment C, page 2 includes the following note about the forecasted balance estimate: "Note that incorporating the proposed CCRA rate of \$0.00638, effective January 1, 2026, into the CCRA calculation should equate a \$0 Forecasted December 2026 Balance. The \$774 Forecasted December 2026 Balance shown is attributable to rounding."

²⁹ Data in Table 4 retrieved from Petition, Attachment C.

MERC's CCRA would ideally be set at a rate that brings the Company's ECO tracker balance as close to zero as possible. Doing so avoids significant over or under recovery of ECO costs by the Company, thus minimizing carrying charges and stabilizing CCRA rates.

Reviewing the data in the Petition's Attachment C, the Department concludes the proposed CCRA factor will bring the ECO tracker closer to zero by the end of 2026 and therefore is reasonable. The Department reviewed the calculation of MERC's proposed CCRA rate of \$0.00638 per therm and concludes it is accurate. The Department recommends the Commission approve the proposed CCRA rate of \$0.00638 per therm to be effective January 1, 2026.

E.2. Customer Notification Method for the CCRA Proposal

In addition to updating the relevant tariff sheet, the Department recommends that the Commission approve the Company's proposed bill message in the billing month immediately following the date of the Commission's Order:

Effective January 1, 2026, the CCRA (conservation cost recovery adjustment) has been revised to \$0.00638 per therm. The CCRA is an annual adjustment to true-up under-recovery or over-recovery of CIP (conservation improvement program) expenses.

F. HISTORICAL ECO ACHIEVEMENTS AND SHARED SAVINGS INCENTIVES

In Table 5, the Department examined energy savings, expenditures, and incentive values for select years. The Department observes that the Company's energy savings and financial incentive decreased from 2023 to 2024 and when comparing 2024 to the Company's 2022-2024 average savings and incentive figures. The Department also observes that the Company's expenditures decreased from 2023 to 2024 but increased when comparing 2024 to the Company's 2022-2024 average expenditures figure.

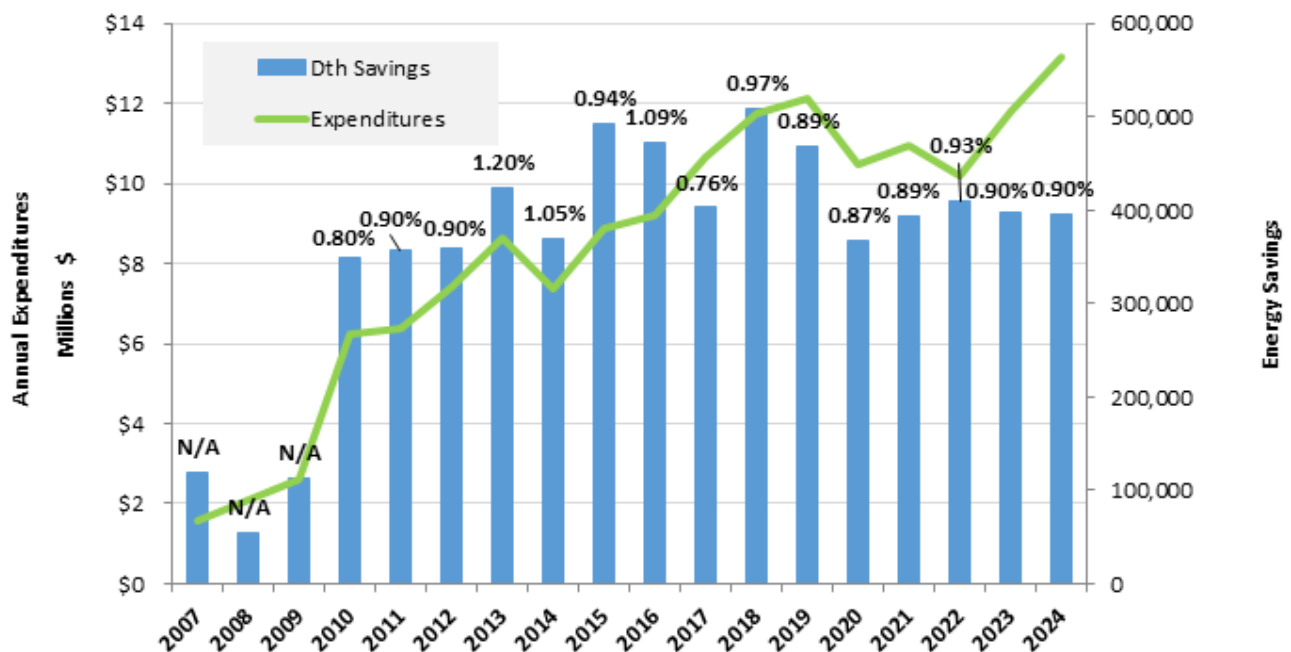
In Figure 1, the Department also provides a more comprehensive summary of the Company's ECO performance over time.

Table 5: Savings, Expenditures, and Incentives for Select Years³⁰

	Energy Savings (Dth)	Expenditures	Shared Savings Incentive
2024	395,470	\$10,915,936	\$998,125
2023	397,439	\$11,820,716	\$1,494,587
2022	410,281	\$8,947,104	\$1,246,952
Average 2022-2024	401,063	\$10,561,252	\$1,246,555
Compare 2024 to 2023	-0.50%	-7.65%	-33.22%
Compare 2024 to Avg 2022-2024	-1.39%	3.36%	-19.93%

³⁰ Data reflects savings and expenditures used to calculate the financial incentive, and thus does not include savings and spending due to specific programs that were excluded from the financial incentive calculation.

Figure 1. Historical ECO Performance



IV. DEPARTMENT RECOMMENDATIONS

The Department reviewed the Company's Petition and concluded that it is generally reasonable. Based on analysis of the Petition and the information in the record, the Department has prepared recommendations, which are provided below. The Department is available to answer any questions the Commission may have.

A. RECOMMENDATIONS TO THE COMMISSION

- A.1. Approve a performance incentive of \$998,125 for 2024 ECO activities;
- A.2. Approve MERC's 2024 ECO tracker account, as summarized in Table 3 above, resulting in a December 31, 2024 tracker balance of \$50,592;
- A.3. Approve a Conservation Cost Recovery Adjustment of \$0.00638 per therm to be effective January 1, 2026, or the first month following the Commission's Order in this proceeding;
- A.4. Approve the Company's proposed bill message in the billing month immediately following the date of the Commission's Order:
 - Effective January 1, 2026, the CCRA (conservation cost recovery adjustment) has been revised to \$0.00638 per therm. The CCRA is an annual adjustment to true-up under-recovery or over-recovery of CIP (conservation improvement program) expenses.
- A.5. Require MERC to submit a compliance filing, within 10 days of the issue date of the Order in the present docket, with revised tariff sheets reflecting the Commission's determinations in this matter.

August 14, 2025

Mike Bull
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. G002/M-25-47

Dear Mr. Bull:

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

*Xcel Energy's Natural Gas 2024 Energy Conservation & Optimization
Consolidated Filing (Petition)*

The Petition was filed by Xcel Energy on April 1, 2025.

The Department recommends that the Minnesota Public Utilities Commission (Commission) approve Xcel Energy's Petition. The Department is available to answer any questions that the Commission may have in this matter.

Sincerely,

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



Before the Minnesota Public Utilities Commission

Comments of the Minnesota Department of Commerce

Docket No. G002/M-25-47

I. INTRODUCTION

On April 1, 2025, Xcel Energy (Xcel or the Company) submitted its Petition with the Commission in docket no. G002/M-25-47. As outlined Section 2, page 18 of the Petition, the Company requests that the Commission approve the following related to Xcel's ECO natural gas activities:

- Performance incentive of \$4,313,292 for 2024 ECO activities.
- 2024 ECO tracker account, resulting in a December 31, 2024, tracker balance of \$3,004,761
- CIP Adjustment Factor of \$0.023370 per therm to be effective October 1, 2025, through September 30, 2026.

The Petition also contains the Company's 2024 Energy Conservation and Optimization (ECO) Status Report (Status Report). The Status Report is intended to fulfill the requirements of the Department's annual ECO reporting rules contained in Minnesota Rules part 7690.0550. Since the Company's Status Report does not require Commission approval, this portion of the Petition has been assigned to a separate docket.¹

II. PROCEDURAL BACKGROUND

April 1, 2025	The Company submitted its Petition with the Commission.
May 19, 2025	The Commission posted a Notice of Comment Period for the Petition.
July 28, 2025	The Department filed a request for variance extension, requesting an additional 14 days to complete its analysis and file comments.
July 28, 2025	The Commission granted the request for extension.

Topics open for comment:

- Should the Commission approve Xcel's proposed gas DSM Financial Incentive of \$4,313,292 for ECO activities in 2024?
- Should the Commission approve Xcel's proposed 2024 gas Conservation Improvement Program (CIP) Tracker Account?
- Should the Commission approve Xcel's proposed 2025-2026 gas CIP Adjustment Factor of \$0.023370 per therm?
- Are there other issues or concerns related to this matter?

¹ See Docket No. E,G002/CIP-23-92.

III. DEPARTMENT ANALYSIS

The Department's analysis of the Company's Petition is provided below in the following sections:

- A. Commission's Order from the Previous Year
- B. Minnesota's Energy Conservation and Optimization Statute
- C. Proposed 2024 Shared Savings DSM Financial Incentive
- D. Proposed 2024 ECO Tracker
- E. Proposed CIP Adjustment Factor
- F. Historical ECO Achievements and Shared Savings Incentives

A. COMMISSION'S ORDER FROM THE PREVIOUS YEAR

On November 8, 2024, the Commission issued its Order approving Xcel's Natural Gas 2023 Energy Conservation & Optimization Consolidated Filing,² with the following determinations:

- 1. Approved Xcel Energy's natural gas Shared Savings DSM financial incentive of \$4,253,188.
- 2. Approved a 2024/2025 natural gas CIP Adjustment Factor of \$ 0.030554 per therm beginning the first billing cycle in the month following the Commission's Order in this matter.
- 3. Approved Xcel Energy's Natural Gas 2023 Tracker account as filed on April 1, 2024, with an ending balance of (\$5,587,506).
- 4. Approved Xcel Energy's proposed bill message, effective the first month the 2024/2025 natural gas CIP Adjustment Factor takes effect, revised as necessary to incorporate the approved CIP Adjustment Factor and effective date, that reads as follows:
 - Effective December 1, 2024, the Resource Adjustment line item on your bill has increased due to a change in the Conservation Improvement Program (CIP) factor. The natural gas CIP portion of the Resource Adjustment is \$0.030554 per therm.
- 5. Required Xcel Energy to submit a compliance filing with tariff sheets including all necessary calculations within 10 days of the issue date of the Order.

B. MINNESOTA'S ENERGY CONSERVATION AND OPTIMIZATION STATUTE

In 2021, the Minnesota Legislature passed the Energy Conservation and Optimization Act (ECO Act).³ The ECO Act primarily serves to modernize what was the Conservation Improvement Program (CIP) to provide a more holistic approach to energy efficiency programming. Notable highlights of the ECO Act include:

² See Commission's November 8, 2024, Order in Docket No. G-002/M-24-47.

³https://www.revisor.mn.gov/bills/text.php?number=HF164&type=bill&version=2&session=ls92&session_year=2021&session_number=0

- Providing participating electric and natural gas utilities the opportunity to optimize energy use and delivery through the inclusion of load management⁴ and efficient fuel-switching (EFS) programs.⁵
- Raising the energy savings goals for the state's electric investor-owned utilities (IOUs).⁶
- More than doubling the low-income spending requirement for all IOUs.⁷
- Providing greater planning flexibility for participating municipal and cooperative utilities.⁸
- Including activities to improve energy efficiency for public schools.⁹

Minn. Stat. § 216B.241 (ECO Statute) provides the framework for IOU ECO programs that deliver energy savings, load management programs, and EFS measures. This includes annual savings goals, which are determined as a percentage of the most recent three-year average of gross retail sales after subtracting sales to ECO-exempt customers.¹⁰ 2024-2026 is the first program year period where requirements from the ECO Act take effect for the IOUs' ECO programs.

The ECO Statute grants jurisdiction to the Department over most of the state's ECO program regulatory activities. The Commission continues to have jurisdiction over two specific conservation items relevant to this proceeding: the Shared Savings DSM Financial Incentive and the recovery of ECO costs.

The Department has regulatory oversight in reviewing and approving utility plans and performance,¹¹ determining cost-effectiveness methodologies¹², and the overall administration of the ECO framework.¹³ Utilities are also allowed to recover costs incurred from delivering ECO programs approved by the Department,¹⁴ which are recovered through a tracker account reviewed and approved annually by the Commission.¹⁵ Finally, the Commission can approve incentive plans encouraging utility success through ECO programs provided the plans meet certain statutory requirements.¹⁶ The Commission has approved Shared Savings DSM Financial Incentive mechanisms for each three-year Triennial Plan since 2010 through Docket No. E,G-999/CI-08-133,¹⁷ and approves annual financial incentives through the ECO tracker account proceedings.¹⁸

⁴ Minn. Stat. § 216B.241, subd. 13.

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⁶ Minn. Stat. § 216B.241, subd. 1c(b).

⁷ Minn. Stat. § 216B.241, subd. 7(a).

⁸ Minn. Stat. § 216B.2403, subd. 3.

⁹ Minn. Stat. §§ 216B.2403, subd 3(j) and 216B.241, subd. 2(i).

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¹² Minn. Stat. § 216B.241 Subd. 1c(e)

¹³ Minn. Stat. § 216B.241, 216B.2402, 216B,2403 and Minn. Rules 7690

¹⁴ Minn. Stat. § 216B.241, subd. 2b.

¹⁵ Minn. Stat. § 216B.16, subd. 6b.

¹⁶ Minn. Stat. § 216B.16, subd. 6c.

¹⁷ Commission Order Establishing Utility Performance Incentives for Energy Conservation, January 27, 2010, Docket Number E,G-999/CI-08-133.

¹⁸ See Commission Orders in Docket Numbers G-008/M-24-43, G-004/M-24-44, G-022/M-24-45, G-011/M-24-46, G-002/M-24-47, E-015/M-24-48, E-017/M-24-49, and E-002/M-24-50.

C. *PROPOSED 2024 SHARED SAVINGS FINANCIAL INCENTIVE*

C.1. *Key Parameters from the 2024-2026 Shared Savings DSM Financial Incentive Plan*

On January 25, 2024, the Commission’s Order approved the current Shared Savings DSM Financial Incentive Plan, which applies to investor-owned gas and electric utilities for savings achieved through ECO during the 2024–2026 Triennial.¹⁹ The Department’s review of the Petition’s proposed Shared Savings Financial Incentive was informed by the requirements included in the Commission’s January 25, 2024, Order.

The current incentive mechanism awards utilities a percentage of their portfolio-wide Minnesota Test net benefits depending on their first-year energy savings achievement. In 2024, the cost-effectiveness test used to calculate net benefits for purposes of the incentive mechanism switched from the Utility Cost Test to the newly developed Minnesota Test, which incorporates additional considerations when measuring cost-effectiveness, such as greenhouse gas emission reductions. The 2024–2026 incentive mechanism modified the previous 2021–2023 incentive mechanism by updating achievement goals for first-year energy savings and the corresponding percentages of net benefits awarded, partially to account for the change in cost-effectiveness tests.

Tables 1 and 2 show the range of annual first-year energy savings a utility can achieve during the 2024–2026 Triennial and the corresponding percentage of net benefits awarded for each level of first-year energy savings.

Table 1: 2024–2026 Natural Gas Incentive

First-Year Energy Savings Achievement (% of Retail Sales)	% of Net Benefits Awarded
0.7% (threshold) ²⁰	1.90%
0.8%	2.32%
0.9%	2.74%
1.0%	3.16%
1.1%	3.58%
1.2% (goal) ²¹	4.00% (cap)

¹⁹ Order Adopting Modifications to Shared Savings Demand-Side Management Financial Incentive Plan, January 25, 2024. Docket Number E,G-999/CI-08-133.

²⁰ The achievement threshold refers to the achievement level a utility must reach before they begin earning an incentive for a given metric.

²¹ The achievement goal refers to the achievement level that aligns with the maximum percentage of net benefits a utility can earn for a given metric.

Table 2: 2024–2026 Electric Incentive

First-Year Energy Savings Achievement (% of Retail Sales)	% of Net Benefits Awarded
1.5% (threshold)	1.30%
1.6%	1.90%
1.7%	2.50%
1.8%	3.10%
1.9%	3.70%
2.0%	4.30%
2.1%	4.90%
2.2% (goal)	5.50% (cap)

Incentive caps limit the total incentive each utility can earn. The 2024–2026 incentive mechanism includes two incentive caps for each utility, one based on net benefits (Net Benefits Cap) and one on portfolio expenditures (Expenditures Cap), with the incentive amount being limited to whichever cap is lower.²² For the 2024–2026 incentive, the gas Net Benefits Cap equals 4 percent of portfolio net benefits and the Expenditures Cap equals 20 percent of total portfolio expenditures. For electric utilities, the Net Benefits Cap equals 5.5 percent of portfolio net benefits and the Expenditures Cap equals 20 percent of total portfolio expenditures. For both gas and electric utilities, the Expenditures Cap increases from 20 to 25 percent if the utility achieves or surpasses the maximum first-year energy savings goal, which is 1.2 percent of average retail sales for gas utilities and 2.2 percent of average retail sales for electric utilities.

Under the ECO framework, gas utilities can include savings and net benefits from qualifying EFS programs when calculating their financial incentive, effectively treating EFS programs the same as traditional ECO programs, provided it has achieved energy savings from non-EFS programs at or above 1 percent of retail sales.²³ An electric utility cannot currently count savings or net benefits from EFS measures when calculating its overall Shared Savings DSM incentive, but a utility, the Department, or other stakeholder may propose a separate EFS incentive for approval by the Commission.²⁴

C.2. The Department’s Review of the Proposed Shared Savings DSM Financial Incentive

The Petition covers ECO activities occurring in program year 2024. The Company reported incentive-eligible total first-year energy savings of 1,298,039 Dth (approximately 1.67% of ECO-applicable retail sales), total expenditures of \$28,173,224, and net benefits of \$107,832,292. To calculate the financial incentive, the Company excluded the third-party EnerChange, Energy Smart, and Trillion BTU

²² Order Adopting Modifications to Shared Savings Demand-Side Management Financial Incentive Plan, January 25, 2024. Docket Number E,G-999/CI-08-133.

²³ Commission’s Order Adopting Modifications to Shared Savings Demand-Side Management Financial Incentive Plan, January 25, 2024, Docket Number E,G-999/CI-08-133.

²⁴ Minn. Stat. § 216B.16, subd. 6c

Alternative ECO programs, regulatory assessments under Minnesota Statute § 216B.241, and non-cost-effective low-income programs from its financial incentive calculations.

Xcel's 2024 incentive calculation is included in Section 5 of the Petition. Based on the terms and conditions of its approved Shared Savings DSM financial incentive plan, the Company requested recovery of a financial incentive of \$4,313,292. The Company's proposed incentive is equal to 4.00% (\$4,313,292/\$107,832,292) of the Company's 2024 calculated net benefits and 15.31% (\$4,313,292/\$28,173,224) of the Company's 2024 expenditures.

The Department's review indicates that the Company correctly calculated its financial incentive for 2024 ECO achievements and did not violate the Commission-approved caps. Therefore, the Department recommends that the Commission approve the Company's 2024 Shared Savings financial incentive of \$4,313,292.

Additionally, should the Commission find it helpful context, the Department also evaluated the broader ECO program achievements reported in the Company's Status Report. As mentioned earlier, since the Company's Status Report does not require Commission approval, this portion of the Petition has been assigned to a separate docket.²⁵ On May 23, 2025, the Department filed a Staff Proposed Decision. The Proposed Decision provides Staff's evaluation of the Status Report's compliance with Minnesota Statutes and Rules, and Staff's examination of the technical assumptions behind the Company's reported ECO performance to ensure that energy savings are cost-effective, measurable, and verifiable. On July 23, 2025, the Department's Assistant Commissioner approved the Company's Status Report achievements.

D. PROPOSED 2024 ECO TRACKER

In its Petition, the Company requested approval of its report on recoveries and expenditures included in the Company's ECO tracker account. This activity can be found in Section 3, page 45 of the utility's Petition and is summarized below in Table 3.

Table 3: Summary of 2024 ECO Tracker Account

Line	Description	Time Period	Amount
1	Beginning Balance	Jan. 1, 2024	(\$5,587,806)
2	Total ECO Expenses	Jan. 1 2024 – Dec. 31, 2024	\$29,285,591
3	DSM Financial Incentive	Approved in 2024 for 2023 Activities	\$4,253,188
4	Carrying Charges	Jan. 1 2024 – Dec. 31 2024	(\$137,275)
5	ECO Expenses Subtotal [Line 1 + Line 2 + Line 3 + Line 4]	Jan. 1 2024 – Dec. 31 2024	\$27,813,698
6	CCRC Recovery	Jan. 1 2024 – Dec. 31, 2024	\$16,245,481
7	CIP Adjustment Factor Recovery	Jan. 1 2024 – Dec. 31, 2024	\$8,563,457
8	ECO Revenues Subtotal [Line 6 + Line 7]	Jan. 1 2024 – Dec. 31, 2024	\$24,808,938
9	Ending Balance [Line 5 - Line 8]	Dec. 31, 2024	\$3,004,761

²⁵ See Docket No. E,G002/CIP-23-92.

The Department reviewed Section 3, page 45 of the Petition and concludes that the Company correctly calculated its 2024 ECO Tracker account. Therefore, the Department recommends the Commission approve the Company's 2024 ECO tracker, resulting in a year-end balance of \$3,004,761.

E. PROPOSED CIP ADJUSTMENT FACTOR

Minnesota Statutes 2016B.16., Subd. 6b(c) states that the Commission "may permit a public utility to file rate schedules providing for annual recovery of the costs of energy conservation improvements." This ECO recovery mechanism is generally referred to as the Conservation Cost Recovery Adjustment (CCRA).

E.1. CIP Adjustment Factor Proposal

On November 8, 2024, the Commission approved Xcel's request to implement the 2024/2025 natural gas CIP Adjustment Factor of \$0.030554 per therm, which went into effect on December 1, 2024. As stated in Section 2, page 21 of the Petition, the Company proposes a CIP Adjustment Factor of \$0.023370 per therm (representing a \$0.007184 per therm decrease) to be effective October 1, 2025, through September 30, 2026. Additionally, as noted by the Company in Section 2, page 21 of the Petition:

As with previous filings, we propose to update the CIP Adjustment Factor using actual revenue recovery and actual expense available at the time of the Company's Reply Comments. Additionally, if the timing of the approval process suggests the implementation of the 2025/2026 CIP Adjustment Factor will occur after October 1, 2025, we will update the implementation date and adjust the proposed factor to recover the approved revenue requirements over the remaining months of the period, through September 2026.

Section 4, page 50 of the Petition outlines the Company's calculation of the proposed CIP Adjustment Factor, as follows:

The CIP Adjustment Factor is normally approved by the Commission for a 12-month period beginning in the month following the Commission's approval and is calculated by dividing the forecasted CIP tracker balance by the forecasted sales (kWh or therms) for the period over which the adjustment will be in place.

If the proposed rate were to be effective beginning October 1, 2025, the Company's September 30, 2026, tracker balance would be \$242, as shown in Table 4. Table 4 also provides details behind Xcel's calculation of its proposed CIP Adjustment Factor of \$0.023370 per therm.

Table 4. Calculation of the Company's Proposed CIP Adjustment Factor²⁶

Line	Description	Time Period	Amount
1	Beginning Balance	October 1, 2025	(\$2,566,818)
2	ECO Expenses	October 2025 – September 2026	\$35,833,808
4	2025 DSM Financial Incentive	Approved in 2026 for 2025 Activities	\$3,732,430
5	Carrying Charges	October 2025 – September 2026	(\$214,374)
6	ECO Expenses Subtotal [Line 1 + Line 2 + Line 3 + Line 4 + Line 5]	October 2025 – September 2026	\$36,785,046
7	CCRC Recovery	October 2025 – September 2026	\$18,616,685
8	Remaining Amount to be Recovered Through CCRA [Line 6 - Line 7]	October 2025 – September 2026	\$18,168,361
9	Projected Sales (Dth)	October 2025 – September 2026	77,741,201
10	Proposed CIP Adjustment Factor (\$/Dth) [Line 8/Line 9]	Effective October 1, 2025	\$0.23370
11	Forecasted Balance	September 30, 2026	\$242

Xcel's CIP Adjustment Factor would ideally be set at a rate that brings the Company's ECO tracker balance as close to zero as possible. Doing so avoids significant over or under recovery of ECO costs by the Company, thus minimizing carrying charges and stabilizing CCRA rates.

Reviewing the data in Section 4 of the Petition, the Department concludes the proposed CIP Adjustment factor will bring the ECO tracker closer to zero by September 30, 2026, and therefore is reasonable.

The Department reviewed the calculation of Xcel's proposed CIP Adjustment Factor of \$0.023370 per therm and concludes it is accurate. The Department recommends the Commission approve the proposed CIP Adjustment Factor of \$0.023370 per therm to be effective October 1, 2025.

E.2. Customer Notification Method for the CIP Adjustment Factor Proposal

In addition to updating the relevant tariff sheet, the Department recommends that the Commission approve the Company's proposed bill message effective the first month the proposed CIP Adjustment Factor takes effect:

Effective Oct. 1, 2025, the Resource Adjustment line item on your bill has decreased due to a change in the Conservation Improvement Program (CIP) factor. The natural gas CIP portion of the Resource Adjustment is \$0.023370 per therm.

²⁶ Data in Table 4 retrieved from Petition Section 4, page 51, 52, 55, and 56.

F. HISTORICAL ECO ACHIEVEMENTS AND SHARED SAVINGS INCENTIVES

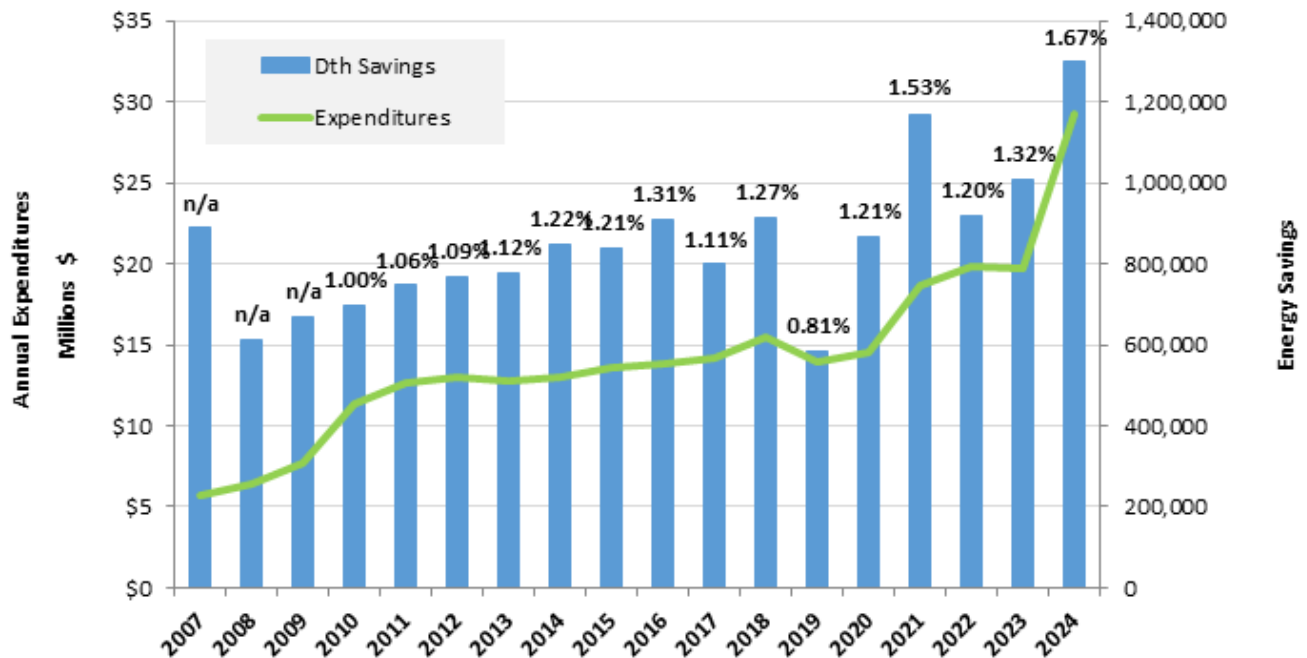
In Table 5, the Department examined energy savings, expenditures, and incentive values for select years. The Department observes that the Company's energy savings, expenditures, and financial incentive increased from 2023 to 2024 and when comparing 2024 to the Company's 2022-2024 average figures.

In Figure 1, the Department also provides a more comprehensive summary of the Company's ECO performance over time. The Department finds that the Company continues to make impressive progress toward its ECO savings achievements.

Table 5: Savings, Expenditures, and Incentives for Select Years²⁷

	Energy Savings (Dth)	Expenditures	Shared Savings Incentive
2024	1,298,039	\$28,173,224	\$4,313,292
2023	1,007,922	\$19,782,422	\$4,253,188
2022	920,504	\$19,857,191	\$3,578,029
Average 2022-2024	1,075,488	\$22,604,279	\$4,048,170
Compare 2024 to 2023	28.78%	42.42%	1.41%
Compare 2024 to Avg 2022-2024	20.69%	24.64%	6.55%

Figure 1. Historical ECO Performance



²⁷ Data reflects savings and expenditures used to calculate the financial incentive, and thus does not include savings and spending due to specific programs that were excluded from the financial incentive calculation.

IV. DEPARTMENT RECOMMENDATIONS

The Department reviewed the Company's Petition and concluded that it is generally reasonable. Based on analysis of the Petition and the information in the record, the Department has prepared recommendations, which are provided below. The Department is available to answer any questions the Commission may have.

A. *RECOMMENDATIONS TO THE COMMISSION*

- A.1. Approve a performance incentive of \$4,313,292 for 2024 ECO activities.
- A.2. Approve Xcel's 2024 ECO tracker account, as summarized in Table 3 above, resulting in a December 31, 2024 tracker balance of \$3,004,761.
- A.3. Approve a CIP Adjustment Factor of \$0.023370 per therm to be effective October 1, 2025, or the first month following the Commission's Order in this proceeding.
- A.4. Approve the Company's proposed bill message effective the first month the proposed CIP Adjustment Factor takes effect:

Effective Oct. 1, 2025, the Resource Adjustment line item on your bill has decreased due to a change in the Conservation Improvement Program (CIP) factor. The natural gas CIP portion of the Resource Adjustment is \$0.023370 per therm.

- A.5. Require Xcel to submit a compliance filing, within 10 days of the issue date of the Order in the present docket, with revised tariff sheets reflecting the Commission's determinations in this matter.

July 22, 2025

Mike Bull
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. E015/M-25-48

Dear Mr. Bull:

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

*Minnesota Power's Conservation Improvement Program Consolidated
Filing (Petition)*

The Petition was filed by Minnesota Power on April 1, 2025.

The Department recommends that the Minnesota Public Utilities Commission (Commission) approve Minnesota Power's Petition. The Department is available to answer any questions that the Commission may have in this matter.

Sincerely,

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

AZ/ad
Attachment



Before the Minnesota Public Utilities Commission

Comments of the Minnesota Department of Commerce

Docket No. E015/M-25-48

I. INTRODUCTION

On April 1, 2025, Minnesota Power (MP or the Company) submitted its Petition with the Commission in Docket No. E015/M-25-48. In its Petition, MP requests that the Commission approve:

- Performance incentive of \$2,600,685 for 2024 ECO activities.
- 2024 ECO tracker account, resulting in a December 31, 2024, tracker balance of \$2,184,533.
- 2025/2026 Conservation Program Adjustment of \$0.000817/kWh to be effective July 1, 2025.
- Carrying Charge rate of 0.6458% for the ECO Tracker.

The Petition also contains the Company's 2024 Energy Conservation and Optimization (ECO) Status Report (Status Report). The Status Report is intended to fulfill the requirements of the Department's annual ECO reporting rules contained in Minnesota Rules part 7690.0550. Since the Company's Status Report does not require Commission approval, this portion of the Petition has been assigned to a separate docket.¹

II. PROCEDURAL BACKGROUND

April 1, 2025	MP submitted its Petition with the Commission.
April 24, 2025	The Commission posted a Notice of Comment Period for the Petition.
June 25, 2025	The Department filed a request for variance extension, requesting an additional 21 days to complete its analysis and file comments.
June 25, 2025	The Commission granted the request for extension.

Topics open for comment:

- Should the Commission approve Minnesota Power's proposed electric DSM Financial Incentive of \$2,600,685 for ECO activities in 2024?
- Should the Commission approve Minnesota Power's proposed 2024 ECO Tracker account, resulting in a year-end balance of \$2,184,533?
- Should the Commission approve Minnesota Power's proposed CPA of \$0.000817/kWh, to be implemented without proration on July 1, 2025?

¹ See Docket No. E015/CIP-23-93

- Should the Commission approve Minnesota Power's proposed Carrying Charge rate of 0.6458% for its ECO Tracker?
- Are there other issues or concerns related to this matter?

III. DEPARTMENT ANALYSIS

The Department's analysis of MP's Petition is provided below in the following sections:

- A. Commission's 2024 Order
- B. Minnesota's Energy Conservation and Optimization Statute
- C. Proposed 2024 Shared Savings DSM Financial Incentive
- D. Proposed 2024 ECO Tracker
- E. Proposed Conservation Program Adjustment for 2025/2026
- F. Proposed Carrying Charge Rate for the ECO Tracker
- G. Historical ECO Achievements and Shared Savings Incentives

A. COMMISSION'S 2024 ORDER

On November 8, 2024, the Commission issued its Order approving MP's 2023 Consolidated CIP filings,² with the following determinations:

1. Approved MP's 2023 ECO tracker account with a December 31, 2023 tracker balance \$477,245.
2. Approved a 2024/2025 Conservation Program Adjustment of \$0.001444 per kilowatt hour, to be effective on the first billing cycle in the next full month after Commission approval.
3. Approved a DSM financial incentive of \$2,190,843 for MP's 2023 ECO achievements, to be included in the Company's ECO tracker account no sooner than the issue date of the Commission's Order.
4. Required MP to submit a compliance filing, within 10 days of the issue date of the Order, with revised tariff sheets reflecting the Commission's determinations in this matter.
5. Approved a monthly Carrying Charge rate of 0.7292 percent for the ECO tracker.

B. MINNESOTA'S ENERGY CONSERVATION AND OPTIMIZATION STATUTE

In 2021, the Minnesota Legislature passed the Energy Conservation and Optimization Act (ECO Act).³ The ECO Act primarily serves to modernize what was the Conservation Improvement Program (CIP) to provide a more holistic approach to energy efficiency programming. Notable highlights of the ECO Act include:

² See Commission's November 8, 2024 Order in Docket No. E-015/M-24-48.

³https://www.revisor.mn.gov/bills/text.php?number=HF164&type=bill&version=2&session=ls92&session_year=2021&session_number=0

- Providing participating electric and natural gas utilities the opportunity to optimize energy use and delivery through the inclusion of load management⁴ and efficient fuel-switching (EFS) programs.⁵
- Raising the energy savings goals for the state's electric investor-owned utilities (IOUs).⁶
- More than doubling the low-income spending requirement for all IOUs.⁷
- Providing greater planning flexibility for participating municipal and cooperative utilities.⁸
- Including activities to improve energy efficiency for public schools.⁹

Minn. Stat. § 216B.241 (ECO Statute) provides the framework for IOU ECO programs that deliver energy savings, load management programs, and EFS measures. This includes annual savings goals, which are determined as a percentage of the most recent three-year average of gross retail sales after subtracting sales to ECO-exempt customers.¹⁰ 2024-2026 is the first program year period where requirements from the ECO Act take effect for the IOUs' ECO programs.

The ECO Statute grants jurisdiction to the Department over most of the state's ECO program regulatory activities. The Commission continues to have jurisdiction over two specific conservation items relevant to this proceeding: the Shared Savings DSM Financial Incentive and the recovery of ECO costs.

The Department has regulatory oversight in reviewing and approving utility plans and performance,¹¹ determining cost-effectiveness methodologies¹², and the overall administration of the ECO framework.¹³ Utilities are also allowed to recover costs incurred from delivering ECO programs approved by the Department,¹⁴ which are recovered through a tracker account reviewed and approved annually by the Commission.¹⁵ Finally, the Commission can approve incentive plans encouraging utility success through ECO programs provided the plans meet certain statutory requirements.¹⁶ The Commission has approved Shared Savings DSM Financial Incentive mechanisms for each three-year Triennial Plan since 2010 through Docket No. E,G-999/CI-08-133,¹⁷ and approves annual financial incentives through the ECO tracker account proceedings.¹⁸

⁴ Minn. Stat. § 216B.241, subd. 13.

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¹⁴ Minn. Stat. § 216B.241, subd. 2b.

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¹⁷ Commission Order Establishing Utility Performance Incentives for Energy Conservation, January 27, 2010, Docket Number E,G-999/CI-08-133.

¹⁸ See Commission Orders in Docket Numbers G-008/M-24-43, G-004/M-24-44, G-022/M-24-45, G-011/M-24-46, G-002/M-24-47, E-015/M-24-48, E-017/M-24-49, and E-002/M-24-50.

C. *PROPOSED 2024 SHARED SAVINGS DSM FINANCIAL INCENTIVE*

C.1. *Key Parameters from the 2024-2026 Shared Savings DSM Financial Incentive Plan*

On January 25, 2024, the Commission’s Order approved the current Shared Savings DSM Financial Incentive Plan, which applies to investor-owned gas and electric utilities for savings achieved through ECO during the 2024–2026 Triennial.¹⁹ The Department’s review of the Petition’s proposed Shared Savings Financial Incentive was informed by the requirements included in the Commission’s January 25, 2024 Order.

The current incentive mechanism awards utilities a percentage of their portfolio-wide Minnesota Test net benefits depending on their first-year energy savings achievement. In 2024, the cost-effectiveness test used to calculate net benefits for purposes of the incentive mechanism switched from the Utility Cost Test to the newly developed Minnesota Test, which incorporates additional considerations when measuring cost-effectiveness, such as greenhouse gas emission reductions. The 2024–2026 incentive mechanism modified the previous 2021–2023 incentive mechanism by updating achievement goals for first-year energy savings and the corresponding percentages of net benefits awarded, partially to account for the change in cost-effectiveness tests.

Tables 1 and 2 show the range of annual first-year energy savings a utility can achieve during the 2024–2026 Triennial and the corresponding percentage of net benefits awarded for each level of first-year energy savings.

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0.9%	2.74%
1.0%	3.16%
1.1%	3.58%
1.2% (goal) ²¹	4.00% (cap)

¹⁹ Order Adopting Modifications to Shared Savings Demand-Side Management Financial Incentive Plan, January 25, 2024. Docket Number E,G-999/CI-08-133.

²⁰ The achievement threshold refers to the achievement level a utility must reach before they begin earning an incentive for a given metric.

²¹ The achievement goal refers to the achievement level that aligns with the maximum percentage of net benefits a utility can earn for a given metric.

Table 2: 2024–2026 Electric Incentive

First-Year Energy Savings Achievement (% of Retail Sales)	% of Net Benefits Awarded
1.5% (threshold)	1.30%
1.6%	1.90%
1.7%	2.50%
1.8%	3.10%
1.9%	3.70%
2.0%	4.30%
2.1%	4.90%
2.2% (goal)	5.50% (cap)

Incentive caps limit the total incentive each utility can earn. The 2024–2026 incentive mechanism includes two incentive caps for each utility, one based on net benefits (Net Benefits Cap) and one on portfolio expenditures (Expenditures Cap), with the incentive amount being limited to whichever cap is lower.²² For the 2024–2026 incentive, the gas Net Benefits Cap equals 4 percent of portfolio net benefits and the Expenditures Cap equals 20 percent of total portfolio expenditures. For electric utilities, the Net Benefits Cap equals 5.5 percent of portfolio net benefits and the Expenditures Cap equals 20 percent of total portfolio expenditures. For both gas and electric utilities, the Expenditures Cap increases from 20 to 25 percent if the utility achieves or surpasses the maximum first-year energy savings goal, which is 1.2 percent of average retail sales for gas utilities and 2.2 percent of average retail sales for electric utilities.

Under the ECO framework, gas utilities can include savings and net benefits from qualifying EFS programs when calculating their financial incentive, effectively treating EFS programs the same as traditional ECO programs, provided it has achieved energy savings from non-EFS programs at or above 1 percent of retail sales.²³ An electric utility cannot currently count savings or net benefits from EFS measures when calculating its overall Shared Savings DSM incentive, but a utility, the Department, or other stakeholder may propose a separate EFS incentive for approval by the Commission.²⁴

C.2. The Department’s Review of Minnesota Power’s Proposed 2024 Shared Savings DSM Financial Incentive

The Petition covers ECO activities occurring in program year 2024. MP reported that its 2024 achievements resulted in total first-year energy savings of 76,582,710 kWh (approximately 3% of ECO-applicable retail sales), total demand savings of 5,942.4 kW, and total expenditures of \$10,604,662. To

²² Order Adopting Modifications to Shared Savings Demand-Side Management Financial Incentive Plan, January 25, 2024. Docket Number E,G-999/CI-08-133.

²³ Commission’s Order Adopting Modifications to Shared Savings Demand-Side Management Financial Incentive Plan, January 25, 2024, Docket Number E,G-999/CI-08-133.

²⁴ Minn. Stat. § 216B.16, subd. 6c

calculate the financial incentive, the Company removed savings and spending due to “MP Projects.”²⁵ Thus, MP reported incentive-eligible energy savings of 76,313,768 kWh, spending of \$10,402,740, and net benefits of \$53,461,303 for 2024 ECO activities.

Based on the terms and conditions of its approved Shared Savings DSM financial incentive plan, MP requested recovery of a DSM financial incentive of \$2,600,685. The Company’s proposed incentive is equal to 4.86% ($\$2,600,685 / \$53,461,303$) of the Company’s 2024 calculated net benefits and 25.00% ($\$2,600,685 / \$10,402,740$) of the Company’s 2024 expenditures.

The Department’s review indicates that the Company correctly calculated its DSM financial incentive for 2024 ECO achievements and did not violate the Commission-approved caps. Therefore, the Department recommends that the Commission approve MP’s 2024 Shared Savings financial incentive of \$2,600,685.

Additionally, should the Commission find it helpful context, the Department also evaluated the broader ECO program achievements reported in the Company’s Status Report. As mentioned earlier, since the Company’s Status Report does not require Commission approval, this portion of the Petition has been assigned to a separate docket.²⁶ On May 23, 2025, the Department filed a Staff Proposed Decision. The Proposed Decision provides Staff’s evaluation of the Status Report’s compliance with Minnesota Statutes and Rules, and Staff’s examination of the technical assumptions behind the Company’s reported ECO performance to ensure that energy savings are cost-effective, measurable, and verifiable. On July 9, 2025, the Department’s Assistant Commissioner Decision approved the ECO achievements reported in MP’s Status Report.

D. PROPOSED 2024 ECO TRACKER

In its Petition, MP requested approval of its report on recoveries and expenditures included in the Company’s ECO tracker account. This activity can be found in Exhibit 1, page 1 of the utility’s Petition and is summarized below in Table 3.

²⁵ On Page 69 of the Petition, MP notes that Order Points 1 and 2 from the Commission’s July 16, 2013 Order Determining Ratemaking Treatment of Utility CIP Project Costs (Docket No. E,G999/DI-12-1342), net benefits and energy savings resulting from MP facilities projects are excluded for the purpose of the financial incentive calculation.

²⁶ See Docket No. E015/CIP-23-93

Table 3: Summary of MP's 2024 ECO Tracker Account

Line	Description	Time Period	Amount
1	Beginning Balance	December 31, 2023	\$477,245
2	ECO Expenses	January 1, 2024 through December 31, 2024	\$10,604,662
3	DSM Financial Incentive	Approved in 2024 for 2023 activities	\$2,190,843
4	Carrying Charges ²⁷	January 1, 2024 through December 31, 2024	(\$53,728)
5	ECO Expenses Subtotal [Line 1 + Line 2 + Line 3 + Line 4]	January 1, 2024 through December 31, 2024	\$13,219,022
6	CCRC Recovery	January 1, 2024 through December 31, 2024	(\$10,072,402)
7	CPA Recovery	January 1, 2024 through December 31, 2024	(\$962,088)
8	ECO Revenues Subtotal [Line 6 + Line 7]	January 1, 2024 through December 31, 2024	(\$11,034,490)
9	Ending Balance [Line 5 + Line 8]	December 31, 2024	\$2,184,533

The Department reviewed Exhibit 1 of the Petition and concludes that the Company correctly calculated its 2024 ECO Tracker account. Therefore, the Department recommends the Commission approve MP's 2024 ECO tracker, resulting in a year-end balance of \$2,184,533.

The Department requests that in future years, the Company provide the ECO tracker in an Excel spreadsheet with all formula intact.

E. PROPOSED CONSERVATION PROGRAM ADJUSTMENT FOR 2025-2026

E.1. Calculation of Proposed Conservation Program Adjustment

The Commission approved MP's current Conservation Program Adjustment (CPA) of \$0.001444 per kWh on November 8, 2024, in Docket No. E015/M-24-48.

On page 12 of its Petition, as it has in past filings, MP explained how its CPA was calculated:

The ECO Tracker Account balance at year-end 2024 reflects the results of prior activity in Tracker 2, as indicated on page 1 of Exhibit 1. However, for CPA purposes, the 2024 year-end balance requires adjustments to properly calculate the proposed CPA factor. Using the fiscal year approach, these factors include actual and anticipated expenditures and cost recovery through base rates (CCRC) and the current CPA rate for the remainder of the current CPA period (January 2025–June 2025) as well as anticipated financial incentives, anticipated ECO expenditures and

²⁷ A monthly carrying charge rate of 0.6670 percent was in effect from January through November of 2024, whereas a monthly carrying charge rate of 0.7292 percent was in effect during December of 2024.

anticipated cost recovery through base rates for the new CPA period (July 2025–June 2026). The fiscal year approach is designed to achieve a zero Tracker balance at the end of the CPA period (fiscal year) rather than at the end of the calendar year. Minnesota Power notes that actual program performance, expenditures and sales will lead to tracker balance fluctuation.

For July 1, 2025, through June 30, 2026, MP proposed a CPA factor of \$0.000817/kWh, or a \$0.000627 per kWh decrease from the Company’s current CPA of \$0.001444 per kWh.

Table 4 below shows the Company’s calculation of its 2025/2026 CPA.

Table 4: MP’s 2025/2026 Conservation Program Adjustment Calculation²⁸

Line	Description	Jan 2025-June 2025	July 2025-June 2026
1	ECO Tracker Account balance	\$2,184,533	(\$891,382)
2	Financial Incentives for 2024 Activity	N/A	\$2,600,685
3	ECO Expenditures	\$4,746,805	\$12,829,989
4	ECO Expenses Subtotal [Line 2 + Line 3]	\$4,746,805	\$15,430,674
5	ECO Costs Recovered Through Base Rates (CCRC)	(\$5,887,178)	(\$12,343,005)
6	ECO Cost Recovery through Rider (CPA)	(\$1,953,146)	N/A
7	ECO Recoveries Subtotal [Line 5 + Line 6]	(\$7,840,324)	(\$12,343,005)
8	Carrying Charges	\$17,605	N/A
9	Recoverable CIP Tracker Balance [Line 1 + Line 4 + Line 7 + Line 8]	(\$891,382)	\$2,196,288
10	CPA per kWh = \$2,196,288/2,689,600,000 kWh		\$0.000817

MP derived its proposed 2025/2026 CPA by dividing the recoverable ECO tracker balance projected for June 30, 2026 (2,196,288, see fourth column of line 9) by the kilowatt hour sales subject to ECO over the corresponding time period (2,689,600,000 kWh, see line 10). The result is the \$0.000817/kWh CPA that the Company proposed.

The Department reviewed MP’s proposed 2025/2026 CPA of \$0.000817/kWh and concludes that the Company calculated its CPA correctly. Minnesota Power requested that the CPA become effective July 1, 2025. The Department recommends the Commission approve the Company’s proposed CPA to be effective July 1, 2025, or the first month following the Commission’s Order in this proceeding.

²⁸ For charges in Lines 3, 5, and 6 (ECO expenditures, ECO base rate recoveries, and CPA recoveries), the Company used actual figures for January and February of 2025, and estimated figures for March 2025 through June 2026.

The Department also requests that in future years, the Company include a monthly tracker with all formula intact, covering all months used to calculate the Company's proposed CPA; in this filing, for example, the tracker would cover each month from January 2025 through June 2026.

F. PROPOSED CARRYING CHARGE RATE FOR THE ECO TRACKER

Minnesota Power's Petition proposes a carrying charge rate of 0.6458% for the ECO Tracker with an effective date on July 1, 2025, or upon approval by the Commission.

As stated on page 8 of the Company's Petition, "Minnesota Power calculates the carrying charge on its ECO Tracker Account using the rate from its multi-year credit facility, which is in accordance with the Commission's Order dated September 16, 2015, in Docket No. E015/M-15-80."

Page 5 of Exhibit 1 in MP's Petition provides additional detail around the calculation of the proposed carrying charge rate. The Department reviewed the details provided by the Company in Exhibit 1 and finds that it appears that MP calculated its proposed carrying charge rate by following the Commission's September 16, 2015, Order.

G. HISTORICAL ECO ACHIEVEMENTS AND SHARED SAVINGS INCENTIVES

In Table 5, the Department examined energy savings, demand savings, expenditures, and incentive values for select years. The Department observes that MP's energy savings and financial incentive increased from 2023 to 2024 and when comparing 2024 to the Company's 2022-2024 average savings and incentive figures.

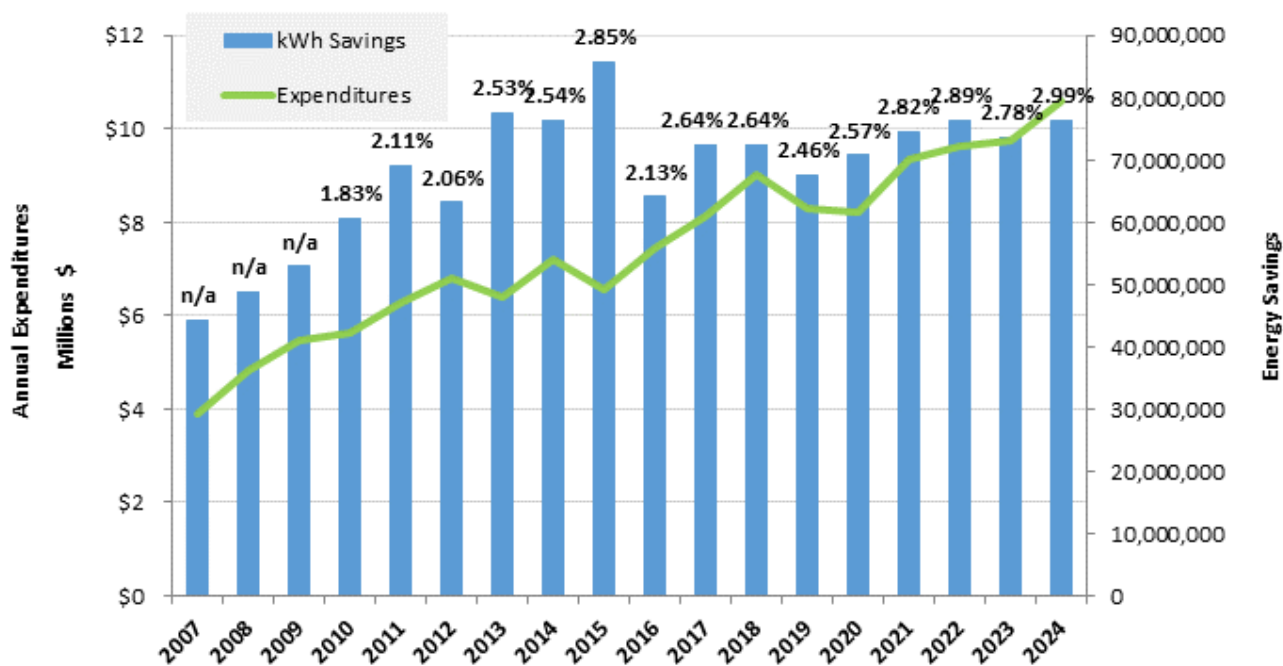
In Figure 1, the Department also provides a more comprehensive summary of MP's ECO performance over time. The Department finds that the Company continues to make impressive progress toward its ECO savings achievements.

Table 5: Savings, Expenditures, and Incentives for Select Years²⁹

	Energy Savings (kWh)	Demand Savings (kW)	Expenditures	Shared Savings Incentive
2024	76,313,768	5,956	\$10,402,740	\$2,600,685
2023	73,549,385	7,072	\$9,560,194	\$2,190,843
2022	76,053,524	8,195	\$9,445,982	\$2,206,583
Average 2022-2024	75,305,559	7,074	\$9,802,972	\$2,332,704
Compare 2024 to 2023	3.76%	-15.78%	8.81%	18.71%
Compare 2024 to Avg 2022-2024	1.34%	-15.81%	6.12%	11.49%

²⁹ Data reflects savings and expenditures used to calculate the financial incentive, and thus does not include savings and spending due to specific programs that were excluded from the financial incentive calculation.

Figure 1. Historical ECO Performance



IV. DEPARTMENT RECOMMENDATIONS

The Department reviewed MP's Petition and concluded that it is generally reasonable. Based on analysis of the Petition and the information in the record, the Department has prepared recommendations to the Company and to the Commission, which are provided below. The Department is available to answer any questions the Commission may have.

A. RECOMMENDATIONS TO MINNESOTA POWER

- A.1. The Department requests that in future filings the Company provide ECO trackers as Excel spreadsheets, with all formulae intact, covering all months from the prior year's tracker and all months used to calculate the CPA.
- A.2. The Department also notes that in future filings, MP may wish to provide redline and clean versions of its tariff pages that incorporate proposed CPA changes.

B. RECOMMENDATIONS TO THE COMMISSION

- B.1. Approve a performance incentive of \$2,600,685 for 2024 ECO activities;
- B.2. Approve MP's 2024 ECO tracker account, as summarized in Table 1 above, resulting in a December 31, 2024 tracker balance of \$2,184,533;
- B.3. Approve a 2025/2026 Conservation Program Adjustment of \$0.000817/kWh to be effective July 1, 2025, or the first month following the Commission's Order in this proceeding;
- B.4. Approval to use a Carrying Charge rate of 0.6458% for the ECO Tracker; and
- B.5. Require MP to submit a compliance filing, within 10 days of the issue date of the Order in the present docket, with revised tariff sheets reflecting the Commission's determinations in this matter.

July 22, 2025

Mike Bull
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. E017/M-25-49

Dear Mr. Bull:

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

*Otter Tail Power's 2024 Annual Filing of the Demand Side Management
Financial Incentive Project and Annual Filing to Update the ECO Rider
(Petition)*

The Petition was filed by Otter Tail Power on April 1, 2025.

The Department recommends that the Minnesota Public Utilities Commission (Commission) approve Otter Tail Power's Petition. The Department is available to answer any questions that the Commission may have.

Sincerely,

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



Before the Minnesota Public Utilities Commission

Comments of the Minnesota Department of Commerce

Docket No. E017/M-25-49

I. INTRODUCTION

On April 1, 2025, Otter Tail Power Company (Otter Tail, OTP, or the Company) submitted its *Petition* with the Commission in Docket No. E017/M-25-49. The Petition contains the following requests for approval:

- Performance incentive of \$1,964,142 for 2024 ECO activities.
- 2024 ECO tracker account, resulting in a December 31, 2024, balance of negative \$3,194,439.
- 2025/2026 Average Conservation Cost Recovery Adjustment factor of \$0.00585/kWh to be effective November 1, 2025.
- Administrative changes to OTP's Energy Conservation and Optimization Rider.
- Variance to Minnesota Rules 7820.3500(K).

The Petition also contains the Company's 2024 Energy Conservation and Optimization (ECO) Status Report (Status Report). The Status Report is intended to fulfill the requirements of the Department's annual ECO reporting rules contained in Minnesota Rules part 7690.0550. Since the Company's Status Report does not require Commission approval, this portion of the Petition has been assigned to a separate docket.¹

II. PROCEDURAL BACKGROUND

April 1, 2025	OTP submitted its Petition with the Commission.
April 24, 2025	The Commission posted a Notice of Comment Period for the Petition.
June 25, 2025	The Department filed a request for variance extension, requesting an additional 21 days to complete its analysis and file comments.
June 25, 2025	The Commission granted the request for extension.

Topics open for comment:

- Should the Commission approve Otter Tail Power Co.'s (Otter Tail) proposed electric DSM Financial Incentive of \$1,964,142 for ECO activities in 2024?

¹ See Docket No. E017/CIP-23-94.

- Should the Commission approve Otter Tail's proposed 2024 ECO Tracker account, resulting in a year-end balance of (\$3,194,439)?
- Should the Commission approve Otter Tail's proposed Average Conservation Cost Recovery Adjustment (CCRA or "ECO Rider") factor of \$0.00585/kWh for bills rendered on and after November 1, 2025?
- Should the Commission approve Otter Tail's proposed "administrative changes" to its ECO Rider tariff?
- Should the Commission approve Otter Tail's request for a variance from Minnesota Rules 7820.3500 (K)?
- Are there other issues or concerns related to this matter?

III. DEPARTMENT ANALYSIS

The Department provides its analysis of Otter Tail's Petition in the following sections:

- A. Commission's 2024 Order
- B. Minnesota's Energy Conservation and Optimization Statute
- C. Proposed 2024 Shared Savings DSM Financial Incentive
- D. Proposed 2024 ECO Tracker
- E. Proposed Average Conservation Cost Recovery Adjustment for 2025/2026
- F. Proposed Administrative Changes to ECO Rider
- G. Proposed Request for a Variance from Minnesota Rules 7820.3500 (K)
- H. Historical ECO Achievements and Shared Savings Incentives

A. COMMISSION'S 2024 ORDER

On November 8, 2024, the Commission issued its Order in Otter Tail's 2023 ECO Filing in Docket No. E-017/M-24-49, with the following determinations:

1. Approved a DSM financial incentive of \$2,705,283.
2. Approved proposed recoveries and expenditures in the Otter Tail's ECO tracker account during 2023 resulting in a year-end 2023 balance of (\$3,321,343).
3. Approved a Conservation Cost Recovery Adjustment of \$0.00555 per kWh to be effective the first billing cycle in the month following Commission approval, as well as the individual class rate factors, should the Commission deem this approval necessary.
4. Granted Otter Tail a variance to Minnesota Rules part 7820.3500(K) for one year after the issue date of the Commission's Order.
5. Approved Otter Tail's proposed changes to its tariff sheets.
6. Required Otter Tail to submit a compliance filing, within 10 days of the issue date of the Order, with revised tariff sheets reflecting the Commission's determinations in this matter.

B. MINNESOTA'S ENERGY CONSERVATION AND OPTIMIZATION STATUTE

In 2021, the Minnesota Legislature passed the Energy Conservation and Optimization Act (ECO Act).² The ECO Act primarily serves to modernize what was the Conservation Improvement Program (CIP) to provide a more holistic approach to energy efficiency programming. Notable highlights of the ECO Act include:

- Providing participating electric and natural gas utilities the opportunity to optimize energy use and delivery through the inclusion of load management³ and efficient fuel-switching (EFS) programs.⁴
- Raising the energy savings goals for the state's electric investor-owned utilities (IOUs).⁵
- More than doubling the low-income spending requirement for all IOUs.⁶
- Providing greater planning flexibility for participating municipal and cooperative utilities.⁷
- Including activities to improve energy efficiency for public schools.⁸

Minn. Stat. § 216B.241 (ECO Statute) provides the framework for IOU ECO programs that deliver energy savings, load management programs, and EFS measures. This includes annual savings goals, which are determined as a percentage of the most recent three-year average of gross retail sales after subtracting sales to ECO-exempt customers.⁹ 2024-2026 is the first program year period where requirements from the ECO Act take effect for the IOUs' ECO programs.

The ECO Statute grants jurisdiction to the Department over most of the state's ECO program regulatory activities. The Commission continues to have jurisdiction over two specific conservation items relevant to this proceeding: the Shared Savings DSM Financial Incentive and the recovery of ECO costs.

The Department has regulatory oversight in reviewing and approving utility plans and performance,¹⁰ determining cost-effectiveness methodologies¹¹, and the overall administration of the ECO framework.¹² Utilities are also allowed to recover costs incurred from delivering ECO programs approved by the Department,¹³ which are recovered through a tracker account reviewed and approved annually by the Commission.¹⁴ Finally, the Commission can approve incentive plans encouraging utility success through ECO programs provided the plans meet certain statutory requirements.¹⁵ The

²https://www.revisor.mn.gov/bills/text.php?number=HF164&type=bill&version=2&session=ls92&session_year=2021&session_number=0

³ Minn. Stat. § 216B.241, subd. 13.

⁴ Minn. Stat. § 216B.2403, subd. 8.

⁵ Minn. Stat. § 216B.241, subd. 1c(b).

⁶ Minn. Stat. § 216B.241, subd. 7(a).

⁷ Minn. Stat. § 216B.2403, subd. 3.

⁸ Minn. Stat. §§ 216B.2403, subd 3(j) and 216B.241, subd. 2(i).

⁹ Minn. Stat. § 216B.241, subd. 1c.

¹⁰ Minn. Stat. § 216B.241 Subd. 2 et seq

¹¹ Minn. Stat. § 216B.241 Subd. 1c(e)

¹² Minn. Stat. § 216B.241, 216B.2402, 216B,2403 and Minn. Rules 7690

¹³ Minn. Stat. § 216B.241, subd. 2b.

¹⁴ Minn. Stat. § 216B.16, subd. 6b.

¹⁵ Minn. Stat. § 216B.16, subd. 6c.

Commission has approved Shared Savings DSM Financial Incentive mechanisms for each three-year Triennial Plan since 2010 through Docket No. E,G-999/CI-08-133,¹⁶ and approves annual financial incentives through the ECO tracker account proceedings.¹⁷

C. *PROPOSED 2024 SHARED SAVINGS DSM FINANCIAL INCENTIVE*

C.1. *Key Parameters from the 2024-2026 Shared Savings DSM Financial Incentive Plan*

On January 25, 2024, the Commission's Order approved the current Shared Savings DSM Financial Incentive Plan, which applies to investor-owned gas and electric utilities for savings achieved through ECO during the 2024–2026 Triennial.¹⁸ The Department's review of the *Petition's* proposed Shared Savings Financial Incentive was informed by the requirements included in the Commission's January 25, 2024 Order.

The current incentive mechanism awards utilities a percentage of their portfolio-wide Minnesota Test net benefits depending on their first-year energy savings achievement. In 2024, the cost-effectiveness test used to calculate net benefits for purposes of the incentive mechanism switched from the Utility Cost Test to the newly developed Minnesota Test, which incorporates additional considerations when measuring cost-effectiveness, such as greenhouse gas emission reductions. The 2024–2026 incentive mechanism modified the previous 2021–2023 incentive mechanism by updating achievement goals for first-year energy savings and the corresponding percentages of net benefits awarded, partially to account for the change in cost-effectiveness tests.

Tables 1 and 2 show the range of annual first-year energy savings a utility can achieve during the 2024–2026 Triennial and the corresponding percentage of net benefits awarded for each level of first-year energy savings.

¹⁶ Commission Order Establishing Utility Performance Incentives for Energy Conservation, January 27, 2010, Docket Number E,G-999/CI-08-133.

¹⁷ See Commission Orders in Docket Numbers G-008/M-24-43, G-004/M-24-44, G-022/M-24-45, G-011/M-24-46, G-002/M-24-47, E-015/M-24-48, E-017/M-24-49, and E-002/M-24-50.

¹⁸ Order Adopting Modifications to Shared Savings Demand-Side Management Financial Incentive Plan, January 25, 2024. Docket Number E,G-999/CI-08-133.

Table 1: 2024–2026 Natural Gas Incentive

First-Year Energy Savings Achievement (% of Retail Sales)	% of Net Benefits Awarded
0.7% (threshold) ¹⁹	1.90%
0.8%	2.32%
0.9%	2.74%
1.0%	3.16%
1.1%	3.58%
1.2% (goal) ²⁰	4.00% (cap)

Table 2: 2024–2026 Electric Incentive

First-Year Energy Savings Achievement (% of Retail Sales)	% of Net Benefits Awarded
1.5% (threshold)	1.30%
1.6%	1.90%
1.7%	2.50%
1.8%	3.10%
1.9%	3.70%
2.0%	4.30%
2.1%	4.90%
2.2% (goal)	5.50% (cap)

Incentive caps limit the total incentive each utility can earn. The 2024–2026 incentive mechanism includes two incentive caps for each utility, one based on net benefits (Net Benefits Cap) and one on portfolio expenditures (Expenditures Cap), with the incentive amount being limited to whichever cap is lower.²¹ For the 2024–2026 incentive, the gas Net Benefits Cap equals 4 percent of portfolio net benefits and the Expenditures Cap equals 20 percent of total portfolio expenditures. For electric utilities, the Net Benefits Cap equals 5.5 percent of portfolio net benefits and the Expenditures Cap equals 20 percent of total portfolio expenditures. For both gas and electric utilities, the Expenditures Cap increases from 20 to 25 percent if the utility achieves or surpasses the maximum first-year energy savings goal, which is 1.2 percent of average retail sales for gas utilities and 2.2 percent of average retail sales for electric utilities.

Under the ECO framework, gas utilities can include savings and net benefits from qualifying EFS programs when calculating their financial incentive, effectively treating EFS programs the same as

¹⁹ The achievement threshold refers to the achievement level a utility must reach before they begin earning an incentive for a given metric.

²⁰ The achievement goal refers to the achievement level that aligns with the maximum percentage of net benefits a utility can earn for a given metric.

²¹ Order Adopting Modifications to Shared Savings Demand-Side Management Financial Incentive Plan, January 25, 2024. Docket Number E,G-999/CI-08-133.

traditional ECO programs, provided it has achieved energy savings from non-EFS programs at or above 1 percent of retail sales.²² An electric utility cannot currently count savings or net benefits from EFS measures when calculating its overall Shared Savings DSM incentive, but a utility, the Department, or other stakeholder may propose a separate EFS incentive for approval by the Commission.²³

C.2. The Department's Review of Otter Tail's Proposed 2024 Shared Savings DSM Financial Incentive

The Petition covers ECO activities occurring in program year 2024. For its 2024 ECO achievements, OTP reported first-year energy savings of 50,321,324 kWh, expenditures of \$7,895,824, and net benefits of \$33,963,044.²⁴ These first-year savings equate to 3.11 percent of OTP's ECO-applicable three-year weather-normalized sales average of 1,617,134,595.

As outlined on page 8 of the Petition, Otter Tail requested recovery of a total financial incentive equal to \$1,964,142, which the Company states, "includes \$1,867,967 as an incentive for 2024 performance of conservation programs and load management and \$96,175 as a financial incentive for 2024 EFS performance." Otter Tail's proposed incentive is equal to 5.78 percent ($\$1,964,142 / \$33,963,044$) of the Company's 2024 calculated net benefits and 24.87 percent ($\$1,964,142 / \$7,895,824$) of the Company's 2024 expenditures.

Regarding Otter Tail's proposal for an incentive based on EFS net benefits, the Department notes that an EFS incentive mechanism for electric utilities has yet to be approved by the Commission, and the opportunity to include an EFS incentive for electric IOUs will sunset on December 31, 2032. Additionally, page 27 of the Petition provides a summary of Otter Tail's methodology for how it calculated its proposed \$96,175 EFS financial incentive, as follows:

The Company has calculated its net benefits from 2024 efficient fuel switching activities and has applied the payout rate of 5.5 percent of EFS net benefits, the same rate that was used for the Company's traditional ECO financial incentive. Applying the 5.5 percent payout rate to its 2024 EFS [Minnesota Cost Test] net benefits of \$1,748,635 is \$96,175.

The Department finds the Company's EFS methodology to be reasonable for its 2024 EFS activities. Given the statutory sunset on an electric EFS incentive, the Department believes allowing Otter Tail to earn an incentive for its 2024 EFS achievements will help continue to prioritize EFS measure implementation in the Company's ECO program and encourage innovative and effective programming.

²² Commission's Order Adopting Modifications to Shared Savings Demand-Side Management Financial Incentive Plan, January 25, 2024, Docket Number E,G-999/CI-08-133.

²³ Minn. Stat. § 216B.16, subd. 6c

²⁴ Net benefits are from Table 2 in Appendix A of the Petition, which shows the calculation of the \$1,867,967 as an incentive for 2024 performance of conservation programs and load management. The net benefits figure excludes net benefits from regulatory assessments, EFS programs, and Otter Tail's Publicly-Owned Property Solar Program. Additionally, pages 21-22 of the Petition outline the calculation steps OTP used for the financial incentive calculation.

Overall, the Department's review indicates that the Company correctly calculated its financial incentive for 2024 ECO achievements and did not violate the Commission-approved caps. Therefore, the Department recommends that the Commission approve OTP's 2024 Shared Savings financial incentive of \$1,964,142.

Additionally, should the Commission find it helpful context, the Department also evaluated the broader ECO program achievements reported in the Company's Status Report. As mentioned earlier, since the Company's Status Report does not require Commission approval, this portion of the Petition has been assigned to a separate docket.²⁵ On May 23, 2025, the Department filed a Staff Proposed Decision. The Proposed Decision provides Staff's evaluation of the Status Report's compliance with Minnesota Statutes and Rules, and Staff's examination of the technical assumptions behind the Company's reported ECO performance to ensure that energy savings are cost-effective, measurable, and verifiable. On July 9, 2025, the Department's Assistant Commissioner Decision approved the ECO achievements reported in Otter Tail's Status Report.

D. PROPOSED 2024 ECO TRACKER

In its Petition, Otter Tail requested approval of its report on recoveries and expenditures included in the Company's 2024 ECO tracker account. This activity can be found in Exhibit 5 of OTP's Petition and is summarized below in Table 3.

Table 3: Summary of Otter Tail's Proposed 2024 ECO Tracker Account²⁶

Line	Description	Time Period	Amount
1	Beginning Balance	December 31, 2023	(\$3,321,343)
2	ECO Expenses	January 1, 2024 through December 31, 2024	\$7,895,774
3	DSM Financial Incentive	Approved in 2024 for 2023 activities	\$2,705,283
4	Carrying Charges ²⁷	January 1, 2024 through December 31, 2024	(\$90,453)
5	ECO Expenses Subtotal [Line 1 + Line 2 + Line 3 + Line 4]	January 1, 2024 through December 31, 2024	\$7,189,261
6	CCRA Recovery	January 1, 2024 through December 31, 2024	(\$10,383,700)
7	Ending Balance [Line 5 + Line 6]	December 31, 2024	(\$3,194,439)

The Department reviewed Exhibit 5 of the Petition and concludes that the Company correctly calculated its 2024 ECO Tracker account. Therefore, the Department recommends the Commission approve Otter Tail's 2024 ECO Tracker, resulting in a year-end balance of (3,194,439).

²⁵ See Docket No. E017/CIP-23-94.

²⁶ The detailed projection can be found in full in the Exhibit 5 spreadsheet attachment to OTP's filing.

²⁷ A monthly carrying charge rate of 1.77 percent was in effect from January through December of 2024.

E. PROPOSED AVERAGE CONSERVATION COST RECOVERY ADJUSTMENT FOR 2025/2026

OTP's current average CCRA factor for December 2024 through October 2025 is equal to \$0.00555/kWh, as approved by the Commission in its November 8, 2024, Order filed in Docket No. E-017/M-24-49.

For November 2025 through October 2026 (2025/2026), OTP is requesting approval to increase the average CCRA factor to \$0.00585/kWh.

Otter Tail projected its 2025/2026 ECO tracker activities assuming a \$0.00585/kWh CCRA that goes into effect at the beginning of November 2025. This information can be found in OTP's Exhibit 1 of its Petition and is summarized in Table 4 below.

Table 4: Otter Tail's Projected 2025/2026 ECO Tracker Account, Using a CCRA of \$0.00585/kWh

Line	Description	Time Period	Amount
1	Beginning Balance	November 1, 2025	(\$1,645,113)
2	ECO Program Expenses	November 1, 2025 – October 31, 2026	\$10,609,571
3	Forecasted Incentive	Forecasted 2026 incentive for 2025 activities	\$2,000,000
4	Carrying Charges	November 1, 2025 – October 31, 2026	(\$16,360)
5	ECO Expenses Subtotal [Line 2 + Line 3 + Line 4]	As of October 31, 2026	\$12,593,211
6	CCRA Recoveries (\$0.00585 /kWh)	November 1, 2025 – October 31, 2026	(\$9,524,756)
7	Ending Balance [Line 1+ Line 5 + Line 6]	As of October 31, 2026	\$1,423,342

Table 4 shows that if Otter Tail's proposed CCRA rate of \$0.00585/kWh were to be in place for a year, the ending tracker balance in October 2026 would be under-recovered at \$1,423,342.

The Department typically recommends that the CCRA be set to a value that brings the projected tracker balance to \$0 over the course of a year, or, alternatively, over the course of the time the rate is proposed to be in place. This recommendation is based on the fact that maintaining higher tracker balances (either positive or negative) is associated with a larger mismatch between the time the expenses are incurred and the time they are recovered. This mismatch between expenses and recoveries is considered undesirable from a ratemaking perspective, as customer churn necessitates a corresponding mismatch between the customers benefiting from conservation services and customers paying for them.

The Department confirmed that Otter Tail calculated its composite CCRA rate correctly. The Department is therefore supportive of the Company's proposed CCRA and recommends Commission approval.

F. PROPOSED ADMINISTRATIVE CHANGES TO ECO RIDER

Otter Tail requested approval of administrative changes to the Company's ECO Rider tariff sheets. As described on page 4 of its filing, the Company proposed the following summary of changes:

Otter Tail Power requests to make administrative changes to its Energy Conservation and Optimization (ECO) Rider tariff, these are a continuation of the changes requested in the last annual update to maintain consistency between the ECO Programs and its recovery mechanism. Otter Tail Power also requests to update the statutory reference to Large Customer Facility customers that have the eligibility to opt out of ECO Programs. With the new ECO legislation, the updated reference should be Minn. Stat. 216B.241, Subd. 1a (a) instead of the current Minn. Stat. 216B.241, Subd. 1a (b).

The section "Redline and Clean Versions of Rate Schedule MN 13.02 – Energy Conservation and Optimization (ECO) Rider" in the *Petition* outlines Otter Tail's proposed administrative changes. The Company proposed the following language changes to the application of rider description found on page 1 of Section 13.02:

"Large Customer Facility" customers that have been exempted from the Company's Energy Conservation and Optimization Improvement Program plan charges pursuant to Minn. Stat. 216B.241, Subd. 1a (~~ab~~) shall receive a monthly exemption from energy and conservation ~~improvement and optimization program plan~~ charges pursuant to Minn. Stat. 216B.16, subd. 6b Energy Conservation Improvement. Such monthly exemption will be effective beginning January 1 of the year following the grant of exemption. Upon exemption from conservation and optimization program plan charges, the "Large Customer Facility" customers can no longer participate in the Company's Energy Conservation and Optimization Improvement Program plan.

The Department has reviewed and finds that the Company's proposed redlined changes are reasonable. The Department therefore recommends the Commission approve Otter Tail's proposed tariff language changes.

G. *PROPOSED REQUEST FOR A VARIANCE FROM MINNESOTA RULES 7820.3500 (K)*

On pages 8-9 of the *Petition*, Otter Tail requested a rule variance to Minnesota Rules part 7820.3500 (K), stating that this request "would allow the Company to continue to include the Conservation Improvement Adjustment on customer bills within the Resource Adjustment line item." Otter Tail also stated that "the Company has been using the combined Resource Adjustment since July 1995, and customers have become familiar with the single-line item on their bill."

As the Department noted in Section III A, the Commission’s November 8, 2024, Order in Docket No. E-017/M-24-49 granted a variance to Minnesota Rules parts 7820.3500(K) for one year after the date of that Order.

For reference, the contents of Minnesota Rules, parts 7820.3500 (K) are as follows:

7820.3500 BILLING CONTENT.

Bills rendered periodically to customers for electric and gas service shall include, but are not limited to, the following information:

[...]

K. fuel or power adjustment clause separately itemized, if applicable;

Based on its review of the Company’s rationale for the proposed variance, the Department recommends that the Commission, as it has in past years, grant a variance to this rule.

H. *HISTORICAL ECO ACHIEVEMENTS AND SHARED SAVINGS INCENTIVES*

In Table 5, the Department examined energy savings, demand savings, expenditures, and incentive values for select years. The Department observes that Otter Tail’s energy savings and financial incentive decreased from 2023 to 2024 and when comparing 2024 to the Company’s 2022-2024 average savings and incentive figures.

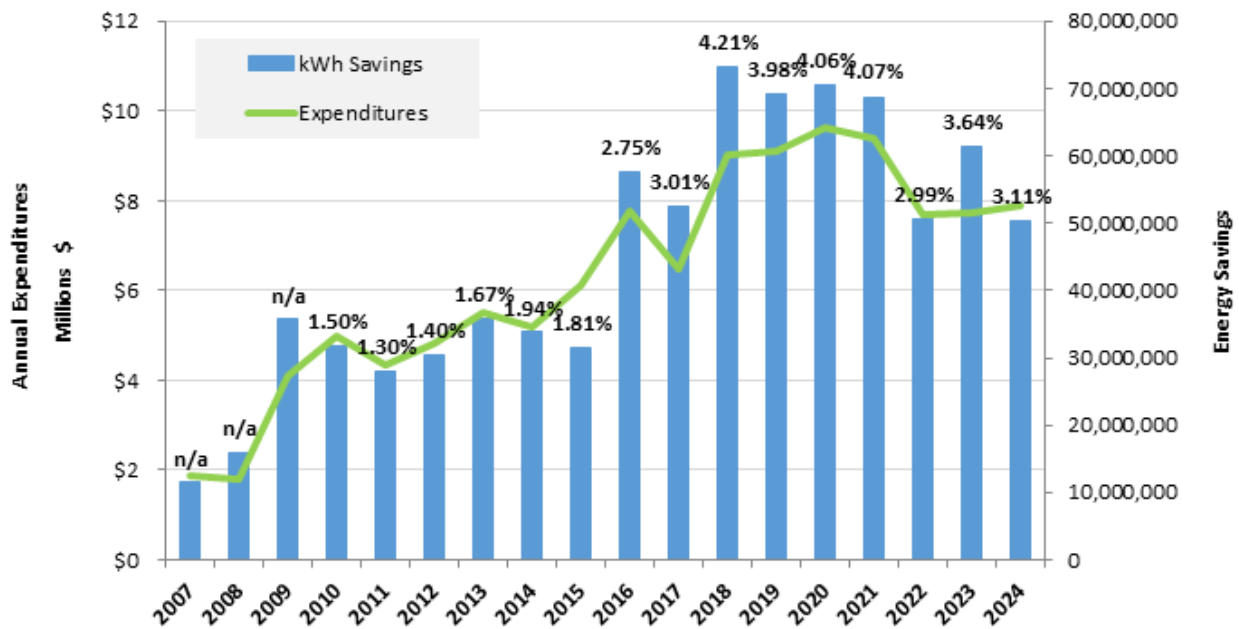
In Figure 1, the Department also provides a more comprehensive summary of Otter Tail’s ECO performance over time. The Department finds that Otter Tail continues to make impressive progress toward its ECO savings achievements.

Table 5: Savings, Expenditures, and Incentives for Selected Years²⁸

	Energy Savings (kWh)	Demand Savings (kW)	ECO Expenditures	Shared Savings Incentive
2024	50,321,324	28,544	\$7,895,824	\$1,964,142
2023	61,144,189	19,598	\$7,729,380	\$2,705,283
2022	50,557,160	22,540	\$7,696,226	\$2,414,490
Average 2022-2024	54,007,558	23,561	\$7,773,810	\$2,361,305
Compare 2024 to 2023	-17.70%	45.65%	2.15%	-27.40%
Compare 2024 to Avg 2022-2024	-6.83%	21.15%	1.57%	-16.82%

²⁸ Data reflects savings and expenditures used to calculate the financial incentive, and thus does not include savings and spending due to specific programs that were excluded from the financial incentive calculation.

Figure 1. Historical ECO Performance



IV. DEPARTMENT RECOMMENDATIONS

The Department reviewed OTP’s Petition and concluded that it is generally reasonable. Based on analysis of the Petition and the information in the record, the Department has prepared recommendations to the Commission, which are provided below. The Department is available to answer any questions the Commission may have.

A. RECOMMENDATIONS TO THE COMMISSION

- A.1. Approve a performance incentive of \$1,964,142 for 2024 ECO activities;
- A.2. Approve Otter Tail’s 2024 ECO tracker account, as summarized in Table 1 above, resulting in a December 31, 2024 tracker balance of (\$3,194,439);
- A.3. Approve an average CCRA of \$0.00585/kWh, to be effective November 1, 2025, or the first month following the Commission’s Order in this proceeding;
- A.4. Approve Otter Tail’s proposed administrative changes to its ECO tariff sheets;
- A.5. Approve Otter Tail’s request for a variance from Minnesota Rules 7820.3500 (K) for one year after the issue date of the Commission’s Order in this proceeding; and
- A.6. Require Otter Tail to submit a compliance filing, within 10 days of the issue date of the Order in the present docket, with revised tariff sheets reflecting the Commission’s determinations in this matter.

July 22, 2025

Mike Bull
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-25-50

Dear Mr. Bull:

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

Xcel Energy's 2024 Energy Conservation & Optimization Consolidated Filing (Petition)

The Company filed the Petition on April 1, 2025.

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

Sincerely,

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



Before the Minnesota Public Utilities Commission

Comments of the Minnesota Department of Commerce

Docket No. E002/M-25-50

I. INTRODUCTION

On April 1, 2025, Northern States Power Company d/b/a Xcel Energy submitted its *Petition* with the Commission in Docket No. E017/M-25-50. The Petition contains the following requests for approval:

- Performance incentive of \$15,133,727 for 2024 ECO activities.
- 2024 ECO tracker account, resulting in a December 31, 2024, balance of negative \$41,453,010.
- 2025/2026 Average Conservation Cost Recovery Adjustment factor of \$0.001396/kWh to be effective November 1, 2025.

The Petition also contains the Company's 2024 Energy Conservation and Optimization (ECO) Status Report (Status Report). The Status Report is intended to fulfill the requirements of the Department's annual ECO reporting rules contained in Minnesota Rules part 7690.0550. Since the Company's Status Report does not require Commission approval, this portion of the Petition has been assigned to a separate docket.¹

The Petition contains data relevant to the Company's natural gas utility as well as to its electric utility. The Department will not comment on information related to the natural gas utility in this docket; instead see Docket No. G002/M-25-47.

II. PROCEDURAL BACKGROUND

April 1, 2025	Xcel submitted its Petition with the Commission.
April 24, 2025	The Commission posted a Notice of Comment Period for the Petition.
June 25, 2025	The Department filed a request for variance extension, requesting an additional 21 days to complete its analysis and file comments.
June 25, 2025	The Commission granted the request for extension.

¹ See Docket No. E,G002/CIP-23-92.

Topics open for comment:

- Should the Commission approve Xcel's proposed electric DSM Financial Incentive of \$15,133,727 for ECO activities in 2024?
- Should the Commission approve Xcel's proposed 2024 electric Conservation Improvement Program (CIP) Tracker Account?
- Should the Commission approve Xcel's proposed 2025-2026 electric CIP Adjustment Factor (CAF) of \$0.001396 per kWh?
- Are there other issues or concerns related to this matter?

III. DEPARTMENT ANALYSIS

The Department provides its analysis of Xcel's Petition in the following sections:

- A. Commission's 2024 Order
- B. Minnesota's Energy Conservation and Optimization Statute
- C. Proposed 2024 Shared Savings DSM Financial Incentive
- D. Proposed 2024 ECO Tracker
- E. Proposed Average Conservation Cost Recovery Adjustment for 2025/2026
- F. Proposed Administrative Changes to ECO Rider
- G. Historical ECO Achievements and Shared Savings Incentives

A. COMMISSION'S 2024 ORDER

On October 31, 2024, the Commission issued its Order in Docket E002/M-24-50 approving Xcel's 2023 DSM financial incentive, CIP Adjustment Factor (CAF), and CIP tracker. In that Order the Commission:

1. Approved Xcel Energy's electric Shared Savings DSM financial incentive of \$26,478,641.
2. Approved Xcel Energy's electric CIP Tracker Account, as filed on April 1, 2024, with an ending balance of (\$22,036,468).
3. Approved Xcel Energy's proposed bill message, effective the first month the \$(0.000389) electric CAF takes effect, revised as necessary to incorporate the approved CIP Adjustment Factor and effective date, that reads as follows:

Effective December 1, 2024, the Resource Adjustment line item on your bill has reduced due to a change in the Conservation Improvement Program (CIP) factor. The electric CIP portion of the Resource Adjustment is (\$0.000389) per kilowatthour (kWh).

4. Required Xcel Energy to submit a compliance filing with tariff sheets and all necessary calculations within 10 days of the issue date of this Order.

5. Approved a 2024/2025 electric CAF of negative \$(0.000389) per kWh beginning the first billing cycle in the month following the Commission's Order in this matter.

B. MINNESOTA'S ENERGY CONSERVATION AND OPTIMIZATION STATUTE

In 2021, the Minnesota Legislature passed the Energy Conservation and Optimization Act (ECO Act). The ECO Act primarily serves to modernize what was the Conservation Improvement Program (CIP) to provide a more holistic approach to energy efficiency programming. Notable highlights of the ECO Act include:

- Providing participating electric and natural gas utilities the opportunity to optimize energy use and delivery through the inclusion of load management and efficient fuel-switching (EFS) programs.
- Raising the energy savings goals for the state's electric investor-owned utilities (IOUs).
- More than doubling the low-income spending requirement for all IOUs.
- Providing greater planning flexibility for participating municipal and cooperative utilities.
- Including activities to improve energy efficiency for public schools.

Minn. Stat. § 216B.241 (ECO Statute) provides the framework for IOU ECO programs that deliver energy savings, load management programs, and EFS measures. This includes annual savings goals, which are determined as a percentage of the most recent three-year average of gross retail sales after subtracting sales to ECO-exempt customers. 2024-2026 is the first program year period where requirements from the ECO Act take effect for the IOUs' ECO programs.

The ECO Statute grants jurisdiction to the Department over most of the state's ECO program regulatory activities. The Commission continues to have jurisdiction over two specific conservation items relevant to this proceeding: the Shared Savings DSM Financial Incentive and the recovery of ECO costs.

The Department has regulatory oversight in reviewing and approving utility plans and performance, determining cost-effectiveness methodologies, and the overall administration of the ECO framework.² Utilities are also allowed to recover costs incurred from delivering ECO programs approved by the Department,³ which are recovered through a tracker account reviewed and approved annually by the Commission. Finally, the Commission can approve incentive plans encouraging utility success through ECO programs provided the plans meet certain statutory requirements.⁴ The Commission has approved Shared Savings DSM Financial Incentive mechanisms for each three-year Triennial Plan since 2010 through Docket No. E,G-999/CI-08-133, and approves annual financial incentives through the ECO tracker account proceedings.

² See Minn. Stat. §§ 216B.241, 216B.2401, 216B.2402, 216B.2403.

³ Minn. Stat. § 216B.241 subd. 2b(a)

⁴ Minn. Stat. § 216B.16 subd. 6c.

C. *PROPOSED 2024 SHARED SAVINGS DSM FINANCIAL INCENTIVE*

C1. *Key Parameters from the 2024-2026 Shared Savings DSM Financial Incentive Plan*

On January 25, 2024, the Commission approved the current Shared Savings DSM Financial Incentive Plan, which applies to investor-owned gas and electric utilities for savings achieved through ECO during the 2024–2026 Triennial.⁵ The Department’s review of the *Petition*’s proposed Shared Savings Financial Incentive was informed by the requirements included in the Commission’s January 25, 2024, Order.

The current incentive mechanism awards utilities a percentage of their portfolio-wide Minnesota Test net benefits depending on their first-year energy savings achievement. In 2024, the cost-effectiveness test used to calculate net benefits for purposes of the incentive mechanism switched from the Utility Cost Test to the newly developed Minnesota Test, which incorporates additional considerations when measuring cost-effectiveness, such as greenhouse gas emission reductions. The 2024–2026 incentive mechanism modified the previous 2021–2023 incentive mechanism by updating achievement goals for first-year energy savings and the corresponding percentages of net benefits awarded, partially to account for the change in cost-effectiveness tests.

Tables 1 and 2 show the range of annual first-year energy savings a utility can achieve during the 2024–2026 Triennial and the corresponding percentage of net benefits awarded for each level of first-year energy savings.

Table 1: 2024–2026 Natural Gas Incentive

First-Year Energy Savings Achievement (% of Retail Sales)	% of Net Benefits Awarded
0.7% (threshold) ⁶	1.90%
0.8%	2.32%
0.9%	2.74%
1.0%	3.16%
1.1%	3.58%
1.2% (goal) ⁷	4.00% (cap)

⁵ Order Adopting Modifications to Shared Savings Demand-Side Management Financial Incentive Plan, January 25, 2024. Docket Number E,G-999/CI-08-133.

⁶ The achievement threshold refers to the achievement level a utility must reach before they begin earning an incentive for a given metric.

⁷ The achievement goal refers to the achievement level that aligns with the maximum percentage of net benefits a utility can earn for a given metric.

Table 2: 2024–2026 Electric Incentive

First-Year Energy Savings Achievement (% of Retail Sales)	% of Net Benefits Awarded
1.5% (threshold)	1.30%
1.6%	1.90%
1.7%	2.50%
1.8%	3.10%
1.9%	3.70%
2.0%	4.30%
2.1%	4.90%
2.2% (goal)	5.50% (cap)

Incentive caps limit the total incentive each utility can earn. The 2024–2026 incentive mechanism includes two incentive caps for each utility, one based on net benefits (Net Benefits Cap) and one on portfolio expenditures (Expenditures Cap), with the incentive amount being limited to whichever cap is lower.⁸ For the 2024–2026 incentive, the gas Net Benefits Cap equals 4 percent of portfolio net benefits and the Expenditures Cap equals 20 percent of total portfolio expenditures. For electric utilities, the Net Benefits Cap equals 5.5 percent of portfolio net benefits and the Expenditures Cap equals 20 percent of total portfolio expenditures. For both gas and electric utilities, the Expenditures Cap increases from 20 to 25 percent if the utility achieves or surpasses the maximum first-year energy savings goal, which is 1.2 percent of average retail sales for gas utilities and 2.2 percent of average retail sales for electric utilities.

Under the ECO framework, gas utilities can include savings and net benefits from qualifying EFS programs when calculating their financial incentive, effectively treating EFS programs the same as traditional ECO programs, provided it has achieved energy savings from non-EFS programs at or above 1 percent of retail sales.⁹ An electric utility cannot currently count savings or net benefits from EFS measures when calculating its overall Shared Savings DSM incentive, but a utility, the Department, or other stakeholder may propose a separate EFS incentive for approval by the Commission.¹⁰

C.2. The Department’s Review of Xcel’s Proposed 2024 Shared Savings DSM Financial Incentive

The Petition covers ECO activities occurring in program year 2024. For its 2024 ECO achievements, Xcel reported first-year energy savings of 516,355,477 kWh, expenditures of \$132,968,362, and net benefits of \$426,592,582. These first-year savings equate to 1.90 percent of Xcel’s ECO-applicable three-year weather-normalized sales average of 27,228,994,609 kWh.

⁸ Order Adopting Modifications to Shared Savings Demand-Side Management Financial Incentive Plan, January 25, 2024. Docket Number E,G-999/CI-08-133.

⁹ Commission’s Order Adopting Modifications to Shared Savings Demand-Side Management Financial Incentive Plan, January 25, 2024, Docket Number E,G-999/CI-08-133.

¹⁰ Minn. Stat. § 216B.16, subd. 6c

Based on the terms and conditions of its approved 2024-2026 Shared Savings DSM Financial Incentive Plan, Xcel requested recovery of a DSM financial incentive of \$15,133,727. Xcel's proposed incentive is equal to 3.68 percent of the Company's 2024 calculated net benefits and 20.00 percent of the Company's 2024 expenditures.

The Department's review indicates that the Company correctly calculated its DSM financial incentive for 2024 ECO achievements and did not violate the Commission-approved caps. Therefore, the Department recommends that the Commission approve Xcel's 2024 Shared Savings financial incentive of \$15,133,727.

Additionally, should the Commission find it helpful context, the Department also evaluated the broader ECO program achievements reported in the Company's Status Report. As mentioned earlier, since the Company's Status Report does not require Commission approval, this portion of the Petition has been assigned to a separate docket.¹¹ On May 23, 2025, the Department filed a Proposed Decision. The Proposed Decision provides Staff's evaluation of the Status Report's compliance with Minnesota Statutes and Rules, and Staff's examination of the technical assumptions behind the Company's reported ECO performance to ensure that energy savings are cost-effective, measurable, and verifiable. On or before July 23, 2025, the Department's Assistant Commissioner Decision is expected to be filed.

D. XCEL'S PROPOSED ELECTRIC 2024 ECO TRACKER

Xcel requested Commission approval of its 2024 electric CIP tracker activity, resulting in a year-end 2024 balance of (\$48,932,973). Table 3 below shows a summary of activity in Xcel Electric's 2024 ECO tracker account.

Table 3: Summary of Xcel's Proposed 2024 ECO Tracker Account¹²

Description	Time Period	Amount
Beginning Balance	December 31, 2023	(\$22,036,468)
CIP Expenses	January 1 through December 31, 2024	\$138,156,042
Other Adjustments	January 1 through December 31, 2024	\$1,106,605
Financial Incentive	-	\$26,478,641
Carrying Charges	January 1 through December 31, 2024	(\$1,619,614)
Recovered in Base Rates	January 1 through December 31, 2024	(\$130,899,825)
Recovered in CIP Adjustment Factor	January 1 through December 31, 2024	(\$52,638,392)
Ending Balance	December 31, 2024	(\$48,932,973)

¹¹ See Docket No. E017/CIP-23-92.

¹² Petition at Page 44.

The Department reviewed Table 6 of the Petition and concludes that the Company correctly calculated its 2024 ECO Tracker account. The Department also reviewed the Company's reasons behind the Other Adjustments line-item totaling \$1,106,605 and found these to be reasonable.¹³ Therefore, the Department recommends the Commission approve Xcel's 2024 ECO Tracker, resulting in a year-end balance of (\$48,932,973).

E. XCEL'S PROPOSED CIP ADJUSTMENT FACTOR FOR 2025/2026

Minnesota law states, in relevant part, that the Commission "may permit a public utility to file rate schedules providing for annual recovery of the cost of energy conservation improvements."¹⁴ Xcel refers to its approved annual electric CIP recovery mechanism as the CIP Adjustment Factor (CAF). In its October 31, 2024, Order in Docket No. E002/M-24-50, the Commission approved a 2024/2025 CAF of (\$0.000389) per kWh for Xcel.

Table 4 below shows Xcel currently projects an October 1, 2025, unrecovered CIP Tracker balance of (\$18,550,932) under the assumption of no additional CIP cost recovery through the CAF. This projection also assumes Xcel's conservation expenditures for the 2025/2026 time period remains close to the forecasted dollar amount.

Table 4: Xcel Electric's Forecasted End of September 2026 CIP Tracker Account¹⁵

Description	Amount
Forecasted beginning balance (Oct 2025)	(\$18,550,932)
Approved expenditures (Oct 2025 - Sept 2026)	\$169,956,173
Forecasted 2025 incentive	\$23,873,552
Less forecasted CCRC recovery (Oct 2025 - Sept 2026)	\$136,438,826
Forecasted October 2026 beginning of month balance	\$38,839,967

Xcel included the above calculations so the Company can calculate the CAF modification needed to align recovery of costs most closely to when costs are incurred and to minimize the under- or over-recovery of CIP costs. This both minimizes carrying charges and helps ensure the customers causing the costs pay for the costs.

The Company proposes to update its electric CIP Adjustment Factor to \$0.001396 per kWh, effective with the first billing cycle of October 2025 through the September 2026 billing period.¹⁶ Xcel's proposed CAF is an increase of \$0.001785 per kWh, or 135.84 percent higher than the currently approved CAF of (\$0.000389) per kWh. Xcel calculated the proposed 2025/2026 factor to allow the

¹³ As described on page 42 of its Petition, Xcel included the following adjustments: (\$1.14m) in the business lighting audit program was spent in 2023, but savings are not being claimed until 2024, so the Company moved this spend to 2024; \$48,697 as a reclass from gas to electric (with a corresponding negative adjustment in the gas tracker).

¹⁴ See Minn. Stat. § [216B.16](#), subd. 6b(c).

¹⁵ Petition, Page 51.

¹⁶ Petition at Page 51.

Company to recover both CIP costs it does not recover through the Conservation Cost Recovery Charge (or “CCRC,” which is represented in base rates) and its approved financial incentives. The proposed CAF would minimize Xcel’s projected tracker balance.

Table 5 below outlines Xcel’s calculation of the proposed CAF.

Table 5: Xcel’s Calculation of Its Revised Electric CIP Adjustment Factor¹⁷

Description	Amount
Forecasted October 1, 2026 Balance without CAF	\$38,839,967
Forecasted Oct 1, 2025 - Sept 30, 2026 Sales (MWh)	27,535,585
Electric CIP Adjustment Rate without Carrying Charges (\$/ MWh)	\$1.411
Electric CIP Adjustment Rate without Carrying Charges (\$/ kWh)	\$0.001411
Xcel Electric’s Proposed CIP Adjustment Factor (\$/ MWh)/1000	\$1.396
Xcel Electric’s Proposed CIP Adjustment Factor (\$/ kWh)/1000	\$0.001396

Xcel adjusted the calculated rate to incorporate the effect of carrying charges, which were not included in the forecasted balance. To get the September 2026 forecasted CIP Tracker balance as close to zero without going negative, the Company adjusted the calculated CIP Adjustment Rate to \$0.001396 per kWh.

Table 6 compares the Company’s current and proposed CIP Adjustment Factors.

Table 6: Xcel’s Current versus Proposed CIP Adjustment Factor

Current Factor (\$/kWh)	Proposed Factor (\$/kWh)	Change (\$/kWh)	Percent Change
(0.00389/kWh)	0.001396/kWh	0.001785/kWh	135.84

The Department notes the proposed CAF is higher than Xcel’s current CIP Adjustment factor. The Department found Xcel’s proposed factor to be accurate using the current forecasted data. Therefore, the Department concludes Xcel’s proposed CIP cost recovery is responsive to the public policy goal of Xcel minimizing carrying charges and recovering costs close to when incurred. The Department recommends the Commission approve Xcel’s proposed CIP Adjustment Factor of \$0.001396 per kWh.

F. XCEL’S PROPOSED CUSTOMER BILL NOTICE

With respect to rate change notification, Xcel proposed to notify customers by implementing the following message on customer bills, effective the first month the 2025/2026 CIP Adjustment Factor takes effect:

Effective Oct. 1, 2025, the Resource Adjustment line item on your bill has increased due to a change in the Conservation Improvement Program (CIP)

¹⁷ Petition at Page 51.

factor. The electric CIP portion of the Resource Adjustment is \$0.001396 per kilowatt-hour (kWh).¹⁸

The Department recommends the Commission approve Xcel’s proposed bill message.

G. HISTORICAL ECO ACHIEVEMENTS AND SHARED SAVINGS INCENTIVES

In Table 7, the Department examined energy savings, demand savings, expenditures, and incentive values for select years. The Department observes that Xcel’s energy savings and financial incentive decreased from 2023 to 2024 and when comparing 2024 to the Company’s 2022-2024 average savings and incentive figures.

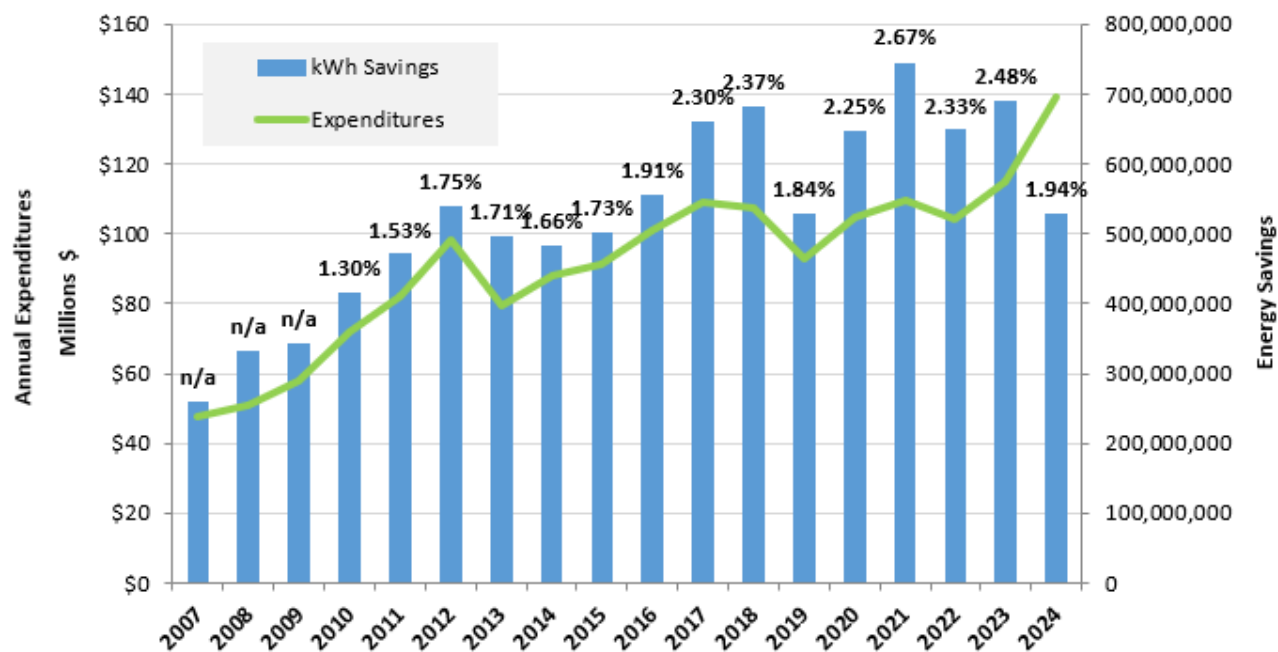
In Figure 1, the Department also provides a more comprehensive summary of Xcel’s ECO performance over time. The Department finds that while Xcel’s achieved energy savings decreased in 2024, the Company continues to achieve savings well beyond the 1.75% minimum requirement.

Table 7: Savings, Expenditures, and Incentives for Selected Years

	Energy Savings (kWh)	Demand Savings (kW)	ECO Expenditures	Shared Savings Incentive
2024	516,355,477	294,347	\$139,262,647	\$15,133,727
2023	689,113,997	238,423	\$115,173,263	\$26,478,641
2022	647,675,810	183,922	\$104,265,717	\$24,271,202
Average 2022-2024	617,715,095	238,897	\$119,567,209	\$21,961,190
Compare 2024 to 2023	-25.07%	23.46%	20.92%	-42.85%
Compare 2024 to Avg 2022-2024	-16.41%	23.21%	16.47%	-31.09%

¹⁸ Petition, Page 32.

Figure 1: Xcel Historical Eco Performance



IV. DEPARTMENT CONCLUSIONS AND RECOMMENDATIONS

The Department concludes Xcel's electric Petition is reasonable, therefore the Department recommends the Commission take the following action:

- 1) Approve Xcel Energy's electric Shared Savings DSM financial incentive of \$15,133,727;
- 2) Approve Xcel Energy's electric CIP Tracker Account, as filed on April 1, 2025, with an ending balance of (\$41,453,010);
- 3) Approve Xcel Energy's proposed 2025-2026 electric CIP Adjustment Factor of \$0.001396 per kWh;
- 4) Approve Xcel Energy's proposed bill message, effective the first month the \$0.001396 per kWh electric CIP Adjustment Factor takes effect, revised as necessary to incorporate the approved CAF and effective date; and
- 5) Require Xcel Energy to submit a compliance filing with tariff sheets and all necessary calculations within 10 days of the issue date of the Order.

CERTIFICATE OF SERVICE

I, Robin Benson, hereby certify that I have this day, served a true and correct copy of the following document to all persons at the addresses indicated below or on the attached list by electronic filing, electronic mail, courier, interoffice mail or by depositing the same enveloped with postage paid in the United States mail at St. Paul, Minnesota.

Minnesota Public Utilities Commission ORDER

Docket Numbers: **E-015/M-25-48; E-017/M-25-49; E-002/M-25-50; G-002/M-25-47;
G-008/M-25-43; G-004/M-25-44; G-022/M-24-45; G-011/M-25-46**

Dated this **20th** day of **November, 2025**

/s/ Robin Benson

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
1	Julie	Ambach	juliea@cmmmpa.org	Shakopee Public Utilities		255 Sarazin St Shakopee MN, 55379 United States	Electronic Service		No	M-25-43
2	Tom	Balster	tombalster@alliantenergy.com	Interstate Power & Light Company		PO Box 351 200 1st St SE Cedar Rapids IA, 52406-0351 United States	Electronic Service		No	M-25-43
3	Lisa	Beckner	lbeckner@mnpower.com	Minnesota Power		30 W Superior St Duluth MN, 55802 United States	Electronic Service		No	M-25-43
4	Sasha	Bergman	sasha.bergman@state.mn.us		Public Utilities Commission		Electronic Service		Yes	M-25-43
5	William	Black	bblack@mmua.org	MMUA		Suite 200 3131 Fernbrook Lane North Plymouth MN, 55447 United States	Electronic Service		No	M-25-43
6	Matthew	Brodin	mbrodin@allete.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	M-25-43
7	Christina	Brusven	cbrusven@fredlaw.com	Fredrikson Byron		60 S 6th St Ste 1500 Minneapolis MN, 55402-4400 United States	Electronic Service		No	M-25-43
8	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-25-43
9	Ray	Choquette	rchoquette@agp.com	Ag Processing Inc.		12700 West Dodge Road PO Box 2047 Omaha NE, 68103-2047 United States	Electronic Service		No	M-25-43
10	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-25-43
11	George	Crocker	gw illc@naw o.org	North American Water Office		5093 Keats Avenue Lake Elmo MN, 55042 United States	Electronic Service		No	M-25-43
12	Charles	Drayton	charles.drayton@enbridge.com	Enbridge Energy		7701 France Ave S Ste	Electronic Service		No	M-25-43

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
				Company, Inc.		600 Edina MN, 55435 United States				
13	Jim	Erchul	jerchul@dbnhs.org	Daytons Bluff Neighborhood Housing Sv.		823 E 7th St St. Paul MN, 55106 United States	Electronic Service		No	M-25-43
14	Greg	Ernst	gaernst@q.com	G. A. Ernst & Associates, Inc.		2377 Union Lake Trl Northfield MN, 55057 United States	Electronic Service		No	M-25-43
15	Melissa S	Feine	melissa.feine@semcac.org	SEMCAAC		PO Box 549 204 S Elm St Rushford MN, 55971 United States	Electronic Service		No	M-25-43
16	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-25-43
17	Karolanne	Foley	karolanne.foley@dairylandpower.com	Dairyland Power Cooperative		PO Box 817 La Crosse WI, 54602- 0817 United States	Electronic Service		No	M-25-43
18	Tyler	Glewwe	tyler.glewwe@centerpointenergy.com	CenterPoint Energy		505 Nicollet Mall Minneapolis MN, 55402 United States	Electronic Service		No	M-25-43
19	Jenny	Glumack	jenny@mrea.org	Minnesota Rural Electric Association		11640 73rd Ave N Maple Grove MN, 55369 United States	Electronic Service		No	M-25-43
20	Jason	Grenier	jgrenier@otpc.com	Otter Tail Power Company		215 South Cascade Street Fergus Falls MN, 56537 United States	Electronic Service		No	M-25-43
21	Jeffrey	Haase	jhaase@greenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	M-25-43
22	Joe	Hoffman	ja.hoffman@smmpa.org	SMMPA		500 First Ave SW Rochester MN, 55902- 3303 United States	Electronic Service		No	M-25-43
23	Dave	Johnson	dave.johnson@aeoa.org	Arrow head Economic Opportunity Agency		702 3rd Ave S Virginia MN, 55792 United States	Electronic Service		No	M-25-43
24	Martin	Kapsch	martin.kapsch@centerpointenergy.com	CenterPoint Energy		505 Nicollet Mall Minneapolis	Electronic Service		No	M-25-43

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				Minnesota Gas		MN, 55402 United States				
25	Deborah	Knoll	dknoll@mnpower.com	Minnesota Power		30 W Superior St Duluth MN, 55802 United States	Electronic Service		No	M-25-43
26	Kathryn	Knudson	kathryn.knudson@centerpointenergy.com	CenterPoint Energy Minnesota Gas		null null, null United States	Electronic Service		No	M-25-43
27	Tina	Koecher	tkoecher@mnpower.com	Minnesota Power		30 W Superior St Duluth MN, 55802-2093 United States	Electronic Service		No	M-25-43
28	Martin	Lepak	martin.lepak@aeoa.org	Arrow head Economic Opportunity		702 S 3rd Ave Virginia MN, 55792 United States	Electronic Service		No	M-25-43
29	Corey	Lubovich	coreyl@hpuc.com	Hibbing Public Utilities Commission		1902 6th Ave E Hibbing MN, 55746 United States	Electronic Service		No	M-25-43
30	Christine	Marquis	regulatory.records@xcelenergy.com	Xcel Energy		414 Nicollet Mall MN1180-07-MCA Minneapolis MN, 55401 United States	Electronic Service		No	M-25-43
31	Josh	Mason	jmason@rpu.org	Rochester Public Utilities		4000 E River Rd NE Rochester MN, 55906 United States	Electronic Service		No	M-25-43
32	Scot	McClure	scotmcclure@alliantenergy.com	Interstate Power And Light Company		4902 N Biltmore Ln PO Box 77007 Madison WI, 53707-1007 United States	Electronic Service		No	M-25-43
33	David	Moeller	dmoeller@allete.com	Minnesota Power			Electronic Service		No	M-25-43
34	Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP		33 South Sixth St Ste 4200 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-43
35	Carl	Nelson	cnelson@mncee.org	Center for Energy and Environment		212 3rd Ave N Ste 560 Minneapolis MN, 55401 United States	Electronic Service		No	M-25-43
36	Samantha	Norris	samanthanorris@alliantenergy.com	Interstate Power and Light Company		200 1st Street SE PO Box 351 Cedar Rapids IA, 52406-	Electronic Service		No	M-25-43

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						0351 United States				
37	Lisa	Pickard	lseverson@minnkota.com	Minnkota Pow er Cooperative		5301 32nd Ave S Grand Forks ND, 58201 United States	Electronic Service		No	M-25-43
38	Bill	Poppert	info@technologycos.com	Technology North		2433 Highw ood Ave St. Paul MN, 55119 United States	Electronic Service		No	M-25-43
39	Dave	Reinke	dreinke@dakotaelectric.com	Dakota Electric Association		4300 220th St W Farmington MN, 55024- 9583 United States	Electronic Service		No	M-25-43
40	Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	1400 BRM Tow er 445 Minnesota St St. Paul MN, 55101-2131 United States	Electronic Service		Yes	M-25-43
41	Jean	Schafer	jeans@bepc.com	Basin Electric Pow er Cooperative		1717 E Interstate Ave Bismarck ND, 58501 United States	Electronic Service		No	M-25-43
42	Rick	Sisk	rsisk@trccompanies.com	Lockheed Martin		1000 Clark Ave. St. Louis MO, 63102 United States	Electronic Service		No	M-25-43
43	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-25-43
44	Anna	Sommer	asommer@energyfuturesgroup.com	Energy Futures Group		PO Box 692 Canton NY, 13617 United States	Electronic Service		No	M-25-43
45	Russ	Stark	russ.stark@ci.stpaul.mn.us	City of St. Paul		Mayor's Office 15 W. Kellogg Blvd., Suite 390 Saint Paul MN, 55102 United States	Electronic Service		No	M-25-43
46	Kodi	Verhalen	kverhalen@taftlaw.com	Taft Stettinius & Hollister LLP		80 S 8th St Ste 2200 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-43
47	Michael	Volker	mvolker@eastriver.coop	East River Electric Pow er Coop		211 S. Harth Ave Madison SD, 57042 United States	Electronic Service		No	M-25-43

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48	Ethan	Warner	ethan.w arner@centerpointenergy.com	CenterPoint Energy		505 Nicollet Mall Minneapolis MN, 55402 United States	Electronic Service		No	M-25-43
49	Robyn	Woeste	robynw oeste@alliantenergy.com	Interstate Power and Light Company		200 First St SE Cedar Rapids IA, 52401 United States	Electronic Service		No	M-25-43

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2	Tom	Balster	tombalster@alliantenergy.com	Interstate Power & Light Company		PO Box 351 200 1st St SE Cedar Rapids IA, 52406-0351 United States	Electronic Service		No	M-25-44
3	Lisa	Beckner	lbeckner@mnpower.com	Minnesota Power		30 W Superior St Duluth MN, 55802 United States	Electronic Service		No	M-25-44
4	Sasha	Bergman	sasha.bergman@state.mn.us		Public Utilities Commission		Electronic Service		Yes	M-25-44
5	William	Black	bblack@mmua.org	MMUA		Suite 200 3131 Fernbrook Lane North Plymouth MN, 55447 United States	Electronic Service		No	M-25-44
6	Matthew	Brodin	mbrodin@allete.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	M-25-44
7	Christina	Brusven	cbrusven@fredlaw.com	Fredrikson Byron		60 S 6th St Ste 1500 Minneapolis MN, 55402-4400 United States	Electronic Service		No	M-25-44
8	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-25-44
9	Ray	Choquette	rchoquette@agp.com	Ag Processing Inc.		12700 West Dodge Road PO Box 2047 Omaha NE, 68103-2047 United States	Electronic Service		No	M-25-44
10	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-25-44
11	George	Crocker	gw illc@naw o.org	North American Water Office		5093 Keats Avenue Lake Elmo MN, 55042 United States	Electronic Service		No	M-25-44
12	Charles	Drayton	charles.drayton@enbridge.com	Enbridge Energy		7701 France Ave S Ste	Electronic Service		No	M-25-44

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14	Greg	Ernst	gaernst@q.com	G. A. Ernst & Associates, Inc.		2377 Union Lake Trl Northfield MN, 55057 United States	Electronic Service		No	M-25-44
15	Melissa S	Feine	melissa.feine@semcac.org	SEMCAAC		PO Box 549 204 S Elm St Rushford MN, 55971 United States	Electronic Service		No	M-25-44
16	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-25-44
17	Karolanne	Foley	karolanne.foley@dairylandpower.com	Dairyland Power Cooperative		PO Box 817 La Crosse WI, 54602- 0817 United States	Electronic Service		No	M-25-44
18	Tyler	Glewwe	tyler.glewwe@centerpointenergy.com	CenterPoint Energy		505 Nicollet Mall Minneapolis MN, 55402 United States	Electronic Service		No	M-25-44
19	Jenny	Glumack	jenny@mrea.org	Minnesota Rural Electric Association		11640 73rd Ave N Maple Grove MN, 55369 United States	Electronic Service		No	M-25-44
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23	Dave	Johnson	dave.johnson@aeoa.org	Arrow head Economic Opportunity Agency		702 3rd Ave S Virginia MN, 55792 United States	Electronic Service		No	M-25-44
24	Martin	Kapsch	martin.kapsch@centerpointenergy.com	CenterPoint Energy		505 Nicollet Mall Minneapolis	Electronic Service		No	M-25-44

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26	Kathryn	Knudson	kathryn.knudson@centerpointenergy.com	CenterPoint Energy Minnesota Gas		null null, null United States	Electronic Service		No	M-25-44
27	Tina	Koecher	tkoecher@mnpower.com	Minnesota Power		30 W Superior St Duluth MN, 55802-2093 United States	Electronic Service		No	M-25-44
28	Martin	Lepak	martin.lepak@aeoa.org	Arrow head Economic Opportunity		702 S 3rd Ave Virginia MN, 55792 United States	Electronic Service		No	M-25-44
29	Corey	Lubovich	coreyl@hpuc.com	Hibbing Public Utilities Commission		1902 6th Ave E Hibbing MN, 55746 United States	Electronic Service		No	M-25-44
30	Christine	Marquis	regulatory.records@xcelenergy.com	Xcel Energy		414 Nicollet Mall MN1180-07-MCA Minneapolis MN, 55401 United States	Electronic Service		No	M-25-44
31	Josh	Mason	jmason@rpu.org	Rochester Public Utilities		4000 E River Rd NE Rochester MN, 55906 United States	Electronic Service		No	M-25-44
32	Scot	McClure	scotmcclure@alliantenergy.com	Interstate Power And Light Company		4902 N Biltmore Ln PO Box 77007 Madison WI, 53707-1007 United States	Electronic Service		No	M-25-44
33	David	Moeller	dmoeller@allete.com	Minnesota Power			Electronic Service		No	M-25-44
34	Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP		33 South Sixth St Ste 4200 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-44
35	Carl	Nelson	cnelson@mncee.org	Center for Energy and Environment		212 3rd Ave N Ste 560 Minneapolis MN, 55401 United States	Electronic Service		No	M-25-44
36	Samantha	Norris	samanthanorris@alliantenergy.com	Interstate Power and Light Company		200 1st Street SE PO Box 351 Cedar Rapids IA, 52406-	Electronic Service		No	M-25-44

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						0351 United States				
37	Lisa	Pickard	lseverson@minnkota.com	Minnkota Pow er Cooperative		5301 32nd Ave S Grand Forks ND, 58201 United States	Electronic Service		No	M-25-44
38	Bill	Poppert	info@technologycos.com	Technology North		2433 Highw ood Ave St. Paul MN, 55119 United States	Electronic Service		No	M-25-44
39	Dave	Reinke	dreinke@dakotaelectric.com	Dakota Electric Association		4300 220th St W Farmington MN, 55024- 9583 United States	Electronic Service		No	M-25-44
40	Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	1400 BRM Tow er 445 Minnesota St St. Paul MN, 55101-2131 United States	Electronic Service		Yes	M-25-44
41	Jean	Schafer	jeans@bepc.com	Basin Electric Pow er Cooperative		1717 E Interstate Ave Bismarck ND, 58501 United States	Electronic Service		No	M-25-44
42	Rick	Sisk	rsisk@trccompanies.com	Lockheed Martin		1000 Clark Ave. St. Louis MO, 63102 United States	Electronic Service		No	M-25-44
43	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-25-44
44	Anna	Sommer	asommer@energyfuturesgroup.com	Energy Futures Group		PO Box 692 Canton NY, 13617 United States	Electronic Service		No	M-25-44
45	Russ	Stark	russ.stark@ci.stpaul.mn.us	City of St. Paul		Mayor's Office 15 W. Kellogg Blvd., Suite 390 Saint Paul MN, 55102 United States	Electronic Service		No	M-25-44
46	Kodi	Verhalen	kverhalen@taftlaw.com	Taft Stettinius & Hollister LLP		80 S 8th St Ste 2200 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-44
47	Michael	Volker	mvolker@eastriver.coop	East River Electric Pow er Coop		211 S. Harth Ave Madison SD, 57042 United States	Electronic Service		No	M-25-44

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49	Robyn	Woeste	robynw oeste@alliantenergy.com	Interstate Power and Light Company		200 First St SE Cedar Rapids IA, 52401 United States	Electronic Service		No	M-25-44

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1	Julie	Ambach	juliea@cmmmpa.org	Shakopee Public Utilities		255 Sarazin St Shakopee MN, 55379 United States	Electronic Service		No	24-45M-24-45
2	Kristine	Anderson	kanderson@greatermngas.com	Greater Minnesota Gas, Inc.		1900 Cardinal Lane PO Box 798 Faribault MN, 55021 United States	Electronic Service		No	24-45M-24-45
3	Tom	Balster	tombalster@alliantenergy.com	Interstate Power & Light Company		PO Box 351 200 1st St SE Cedar Rapids IA, 52406-0351 United States	Electronic Service		No	24-45M-24-45
4	Lisa	Beckner	lbeckner@mnpower.com	Minnesota Power		30 W Superior St Duluth MN, 55802 United States	Electronic Service		No	24-45M-24-45
5	Sasha	Bergman	sasha.bergman@state.mn.us		Public Utilities Commission		Electronic Service		No	24-45M-24-45
6	William	Black	bblack@mmua.org	MMUA		Suite 200 3131 Fernbrook Lane North Plymouth MN, 55447 United States	Electronic Service		No	24-45M-24-45
7	Matthew	Brodin	mbrodin@allete.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	24-45M-24-45
8	Christina	Brusven	cbrusven@fredlaw.com	Fredrikson Byron		60 S 6th St Ste 1500 Minneapolis MN, 55402-4400 United States	Electronic Service		No	24-45M-24-45
9	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	24-45M-24-45
10	Robin	Burke	rburke@greatermngas.com	Greater Minnesota Gas, Inc.		1900 Cardinal Ln PO Box 798 Faribault MN, 55021 United States	Electronic Service		No	24-45M-24-45
11	Cody	Chilson	cchilson@greatermngas.com	Greater Minnesota Gas, Inc. & Greater MN Transmission, LLC		1900 Cardinal Ln PO Box 798 Faribault MN, 55021 United States	Electronic Service		No	24-45M-24-45
12	Ray	Choquette	rchoquette@agp.com	Ag Processing		12700 West Dodge Road	Electronic Service		No	24-45M-24-45

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25	Joe	Hoffman	ja.hoffman@smmpa.org	SMMPA		500 First Ave SW Rochester MN, 55902-3303 United States	Electronic Service		No	24-45M-24-45
26	Dave	Johnson	dave.johnson@aeoa.org	Arrow head Economic Opportunity Agency		702 3rd Ave S Virginia MN, 55792 United States	Electronic Service		No	24-45M-24-45
27	Martin	Kapsch	martin.kapsch@centerpointenergy.com	CenterPoint Energy Minnesota Gas		505 Nicollet Mall Minneapolis MN, 55402 United States	Electronic Service		No	24-45M-24-45
28	Deborah	Knoll	dknoll@mpow er.com	Minnesota Pow er		30 W Superior St Duluth MN, 55802 United States	Electronic Service		No	24-45M-24-45
29	Kathryn	Knudson	kathryn.knudson@centerpointenergy.com	CenterPoint Energy Minnesota Gas		null null, null United States	Electronic Service		No	24-45M-24-45
30	Tina	Koecher	tkoecher@mpow er.com	Minnesota Pow er		30 W Superior St Duluth MN, 55802-2093 United States	Electronic Service		No	24-45M-24-45
31	Nicolle	Kupser	nkupser@greatermngas.com	Greater Minnesota Gas, Inc.		1900 Cardinal Ln PO Box 798 Faribault MN, 55021 United States	Electronic Service		No	24-45M-24-45
32	Martin	Lepak	martin.lepak@aeoa.org	Arrow head Economic Opportunity		702 S 3rd Ave Virginia MN, 55792 United States	Electronic Service		No	24-45M-24-45
33	Corey	Lubovich	coreyl@hpuc.com	Hibbing Public Utilities Commission		1902 6th Ave E Hibbing MN, 55746 United States	Electronic Service		No	24-45M-24-45
34	Christine	Marquis	regulatory.records@xcelenergy.com	Xcel Energy		414 Nicollet Mall MN1180-07-MCA Minneapolis MN, 55401 United States	Electronic Service		No	24-45M-24-45
35	Josh	Mason	jmason@rpu.org	Rochester Public Utilities		4000 E River Rd NE Rochester MN, 55906 United States	Electronic Service		No	24-45M-24-45

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37	David	Moeller	dmoeller@allete.com	Minnesota Power			Electronic Service		No	24-45M-24-45
38	Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP		33 South Sixth St Ste 4200 Minneapolis MN, 55402 United States	Electronic Service		No	24-45M-24-45
39	Carl	Nelson	cnelson@mncee.org	Center for Energy and Environment		212 3rd Ave N Ste 560 Minneapolis MN, 55401 United States	Electronic Service		No	24-45M-24-45
40	Samantha	Norris	samanthanorris@alliantenergy.com	Interstate Power and Light Company		200 1st Street SE PO Box 351 Cedar Rapids IA, 52406-0351 United States	Electronic Service		No	24-45M-24-45
41	Greg	Palmer	gpalmer@greatermngas.com	Greater Minnesota Gas, Inc.		1900 Cardinal Ln PO Box 798 Faribault MN, 55021 United States	Electronic Service		No	24-45M-24-45
42	Lisa	Pickard	lseverson@minnkota.com	Minnkota Power Cooperative		5301 32nd Ave S Grand Forks ND, 58201 United States	Electronic Service		No	24-45M-24-45
43	Bill	Poppert	info@technologycos.com	Technology North		2433 Highway Ave St. Paul MN, 55119 United States	Electronic Service		No	24-45M-24-45
44	Dave	Reinke	dreinke@dakotaelectric.com	Dakota Electric Association		4300 220th St W Farmington MN, 55024-9583 United States	Electronic Service		No	24-45M-24-45
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49	Anna	Sommer	asommer@energyfuturesgroup.com	Energy Futures Group		PO Box 692 Canton NY, 13617 United States	Electronic Service		No	24-45M-24-45
50	Russ	Stark	russ.stark@ci.stpaul.mn.us	City of St. Paul		Mayor's Office 15 W. Kellogg Blvd., Suite 390 Saint Paul MN, 55102 United States	Electronic Service		No	24-45M-24-45
51	Kodi	Verhalen	kverhalen@taftlaw.com	Taft Stettinius & Hollister LLP		80 S 8th St Ste 2200 Minneapolis MN, 55402 United States	Electronic Service		No	24-45M-24-45
52	Michael	Volker	mvolker@eastriver.coop	East River Electric Power Coop		211 S. Harth Ave Madison SD, 57042 United States	Electronic Service		No	24-45M-24-45
53	Ethan	Warner	ethan.warner@centerpointenergy.com	CenterPoint Energy		505 Nicollet Mall Minneapolis MN, 55402 United States	Electronic Service		No	24-45M-24-45
54	Robyn	Woeste	robynw oeste@alliantenergy.com	Interstate Power and Light Company		200 First St SE Cedar Rapids IA, 52401 United States	Electronic Service		No	24-45M-24-45

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
1	Julie	Ambach	juliea@cmmpa.org	Shakopee Public Utilities		255 Sarazin St Shakopee MN, 55379 United States	Electronic Service		No	M-25-46
2	Tom	Balster	tombalster@alliantenergy.com	Interstate Pow er & Light Company		PO Box 351 200 1st St SE Cedar Rapids IA, 52406-0351 United States	Electronic Service		No	M-25-46
3	Lisa	Beckner	lbeckner@mnpow er.com	Minnesota Pow er		30 W Superior St Duluth MN, 55802 United States	Electronic Service		No	M-25-46
4	Sasha	Bergman	sasha.bergman@state.mn.us		Public Utilities Commission		Electronic Service		Yes	M-25-46
5	William	Black	bblack@mmua.org	MMUA		Suite 200 3131 Fernbrook Lane North Plymouth MN, 55447 United States	Electronic Service		No	M-25-46
6	Matthew	Brodin	mbrodin@allete.com	Minnesota Pow er		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	M-25-46
7	Christina	Brusven	cbrusven@fredlaw.com	Fredrikson Byron		60 S 6th St Ste 1500 Minneapolis MN, 55402-4400 United States	Electronic Service		No	M-25-46
8	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-25-46
9	Ray	Choquette	rchoquette@agp.com	Ag Processing Inc.		12700 West Dodge Road PO Box 2047 Omaha NE, 68103-2047 United States	Electronic Service		No	M-25-46
10	Generic	Commerce Attorneys	commerce.attorneys@ag.state.mn.us		Office of the Attorney General - Department	445 Minnesota Street Suite 1400 St. Paul MN,	Electronic Service		Yes	M-25-46

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
					of Commerce	55101 United States				
11	George	Crocker	gw ille@naw o.org	North American Water Office		5093 Keats Avenue Lake Elmo MN, 55042 United States	Electronic Service		No	M-25-46
12	Charles	Drayton	charles.drayton@enbridge.com	Enbridge Energy Company, Inc.		7701 France Ave S Ste 600 Edina MN, 55435 United States	Electronic Service		No	M-25-46
13	Jim	Erchul	jerchul@dbnhs.org	Daytons Bluff Neighborhood Housing Sv.		823 E 7th St St. Paul MN, 55106 United States	Electronic Service		No	M-25-46
14	Greg	Ernst	gaernst@q.com	G. A. Ernst & Associates, Inc.		2377 Union Lake Trl Northfield MN, 55057 United States	Electronic Service		No	M-25-46
15	Melissa S	Feine	melissa.feine@semcac.org	SEMCAC		PO Box 549 204 S Elm St Rushford MN, 55971 United States	Electronic Service		No	M-25-46
16	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-25-46
17	Karolanne	Foley	karolanne.foley@dairylandpower.com	Dairyland Power Cooperative		PO Box 817 La Crosse WI, 54602-0817 United States	Electronic Service		No	M-25-46
18	Tyler	Glew w e	tyler.glew w e@centerpointenergy.com	CenterPoint Energy		505 Nicollet Mall Minneapolis MN, 55402 United States	Electronic Service		No	M-25-46
19	Jenny	Glumack	jenny@mrea.org	Minnesota Rural Electric Association		11640 73rd Ave N Maple Grove MN, 55369 United States	Electronic Service		No	M-25-46
20	Jason	Grenier	jgrenier@otpc.com	Otter Tail Power Company		215 South Cascade Street Fergus Falls MN, 56537	Electronic Service		No	M-25-46

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						United States				
21	Jeffrey	Haase	jhaase@grenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	M-25-46
22	Joe	Hoffman	ja.hoffman@smpa.org	SMPA		500 First Ave SW Rochester MN, 55902-3303 United States	Electronic Service		No	M-25-46
23	Joylyn C	Hoffman Malueg	joylyn.hoffmanmalueg@weenergygroup.com	Minnesota Energy Resources		2685 145th St W Rosemount MN, 55068 United States	Electronic Service		No	M-25-46
24	Dave	Johnson	dave.johnson@aeoa.org	Arrow head Economic Opportunity Agency		702 3rd Ave S Virginia MN, 55792 United States	Electronic Service		No	M-25-46
25	Martin	Kapsch	martin.kapsch@centerpointenergy.com	CenterPoint Energy Minnesota Gas		505 Nicollet Mall Minneapolis MN, 55402 United States	Electronic Service		No	M-25-46
26	Deborah	Knoll	dknoll@mpower.com	Minnesota Power		30 W Superior St Duluth MN, 55802 United States	Electronic Service		No	M-25-46
27	Kathryn	Knudson	kathryn.knudson@centerpointenergy.com	CenterPoint Energy Minnesota Gas		null null, null United States	Electronic Service		No	M-25-46
28	Tina	Koecher	tkoecher@mpower.com	Minnesota Power		30 W Superior St Duluth MN, 55802-2093 United States	Electronic Service		No	M-25-46
29	Martin	Lepak	martin.lepak@aeoa.org	Arrow head Economic Opportunity		702 S 3rd Ave Virginia MN, 55792 United States	Electronic Service		No	M-25-46
30	Corey	Lubovich	coreyl@hpuc.com	Hibbing Public Utilities Commission		1902 6th Ave E Hibbing MN, 55746 United States	Electronic Service		No	M-25-46
31	Christine	Marquis	regulatory.records@xcelenergy.com	Xcel Energy		414 Nicollet Mall	Electronic Service		No	M-25-46

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
41	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-25-46
42	Jean	Schafer	jeans@bepc.com	Basin Electric Power Cooperative		1717 E Interstate Ave Bismarck ND, 58501 United States	Electronic Service		No	M-25-46
43	Rick	Sisk	rsisk@trccompanies.com	Lockheed Martin		1000 Clark Ave. St. Louis MO, 63102 United States	Electronic Service		No	M-25-46
44	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-25-46
45	Anna	Sommer	asommer@energyfuturesgroup.com	Energy Futures Group		PO Box 692 Canton NY, 13617 United States	Electronic Service		No	M-25-46
46	Russ	Stark	russ.stark@ci.stpaul.mn.us	City of St. Paul		Mayor's Office 15 W. Kellogg Blvd., Suite 390 Saint Paul MN, 55102 United States	Electronic Service		No	M-25-46
47	Kristin	Stastny	kstastny@taftlaw.com	Taft Stettinius & Hollister LLP		2200 IDS Center 80 South 8th Street Minneapolis MN, 55402 United States	Electronic Service		No	M-25-46
48	Kodi	Verhalen	kverhalen@taftlaw.com	Taft Stettinius & Hollister LLP		80 S 8th St Ste 2200 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-46
49	Michael	Volker	mvolker@eastriver.coop	East River Electric Power Coop		211 S. Harth Ave Madison SD, 57042 United States	Electronic Service		No	M-25-46
50	Ethan	Warner	ethan.warner@centerpointenergy.com	CenterPoint Energy		505 Nicollet Mall	Electronic Service		No	M-25-46

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						Minneapolis MN, 55402 United States				
51	Robyn	Woeste	robynwoeste@alliantenergy.com	Interstate Power and Light Company		200 First St SE Cedar Rapids IA, 52401 United States	Electronic Service		No	M-25-46

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
12	George	Crocker	gw illc@naw o.org	North American Water Office		5093 Keats Avenue Lake Elmo MN, 55042 United States	Electronic Service		No	M-25-47
13	Charles	Drayton	charles.drayton@enbridge.com	Enbridge Energy Company, Inc.		7701 France Ave S Ste 600 Edina MN, 55435 United States	Electronic Service		No	M-25-47
14	Jim	Erchul	jerchul@dbnhs.org	Daytons Bluff Neighborhood Housing Sv.		823 E 7th St St. Paul MN, 55106 United States	Electronic Service		No	M-25-47
15	Greg	Ernst	gaernst@q.com	G. A. Ernst & Associates, Inc.		2377 Union Lake Trl Northfield MN, 55057 United States	Electronic Service		No	M-25-47
16	Melissa S	Feine	melissa.feine@semcac.org	SEMCAC		PO Box 549 204 S Elm St Rushford MN, 55971 United States	Electronic Service		No	M-25-47
17	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-25-47
18	Karolanne	Foley	karolanne.foley@dairylandpower.com	Dairyland Power Cooperative		PO Box 817 La Crosse WI, 54602-0817 United States	Electronic Service		No	M-25-47
19	Tyler	Glew w e	tyler.glew w e@centerpointenergy.com	CenterPoint Energy		505 Nicollet Mall Minneapolis MN, 55402 United States	Electronic Service		No	M-25-47
20	Jenny	Glumack	jenny@mrea.org	Minnesota Rural Electric Association		11640 73rd Ave N Maple Grove MN, 55369 United States	Electronic Service		No	M-25-47
21	Jason	Grenier	jgrenier@otpc.com	Otter Tail Power Company		215 South Cascade Street Fergus Falls MN, 56537 United States	Electronic Service		No	M-25-47
22	Todd J.	Guerrero	todd.guerrero@kutakrock.com	Kutak Rock LLP		Suite 1750 220 South Sixth Street Minneapolis MN, 55402-1425 United States	Electronic Service		No	M-25-47
23	Jeffrey	Haase	jhaase@greenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	M-25-47

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
24	Annete	Henkel	mui@mnutilityinvestors.org	Minnesota Utility Investors		413 Wacouta Street #230 St.Paul MN, 55101 United States	Electronic Service		No	M-25-47
25	Joe	Hoffman	ja.hoffman@smmpa.org	SMMPA		500 First Ave SW Rochester MN, 55902-3303 United States	Electronic Service		No	M-25-47
26	Michael	Hoppe	lu23@ibew 23.org	Local Union 23, I.B.E.W.		445 Etna Street Ste. 61 St. Paul MN, 55106 United States	Electronic Service		No	M-25-47
27	Dave	Johnson	dave.johnson@aeoa.org	Arrow head Economic Opportunity Agency		702 3rd Ave S Virginia MN, 55792 United States	Electronic Service		No	M-25-47
28	Richard	Johnson	rick.johnson@law moss.com	Moss & Barnett		150 S. 5th Street Suite 1200 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-47
29	Sarah	Johnson Phillips	sjphillips@stoel.com	Stoel Rives LLP		33 South Sixth Street Suite 4200 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-47
30	Martin	Kapsch	martin.kapsch@centerpointenergy.com	CenterPoint Energy Minnesota Gas		505 Nicollet Mall Minneapolis MN, 55402 United States	Electronic Service		No	M-25-47
31	Deborah	Knoll	dknoll@mpow er.com	Minnesota Pow er		30 W Superior St Duluth MN, 55802 United States	Electronic Service		No	M-25-47
32	Kathryn	Knudson	kathryn.knudson@centerpointenergy.com	CenterPoint Energy Minnesota Gas		null null, null United States	Electronic Service		No	M-25-47
33	Tina	Koecher	tkoecher@mpow er.com	Minnesota Pow er		30 W Superior St Duluth MN, 55802-2093 United States	Electronic Service		No	M-25-47
34	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-25-47
35	Martin	Lepak	martin.lepak@aeoa.org	Arrow head Economic Opportunity		702 S 3rd Ave Virginia MN,	Electronic Service		No	M-25-47

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						55792 United States				
36	Corey	Lubovich	coreyl@hpuc.com	Hibbing Public Utilities Commission		1902 6th Ave E Hibbing MN, 55746 United States	Electronic Service		No	M-25-47
37	Christine	Marquis	regulatory.records@xcelenergy.com	Xcel Energy		414 Nicollet Mall MN1180-07-MCA Minneapolis MN, 55401 United States	Electronic Service		Yes	M-25-47
38	Josh	Mason	jmason@rpu.org	Rochester Public Utilities		4000 E River Rd NE Rochester MN, 55906 United States	Electronic Service		No	M-25-47
39	Scot	McClure	scotmcclure@alliantenergy.com	Interstate Power And Light Company		4902 N Biltmore Ln PO Box 77007 Madison WI, 53707-1007 United States	Electronic Service		No	M-25-47
40	David	Moeller	dmoeller@allete.com	Minnesota Power			Electronic Service		No	M-25-47
41	Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP		33 South Sixth St Ste 4200 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-47
42	Carl	Nelson	cnelson@mncee.org	Center for Energy and Environment		212 3rd Ave N Ste 560 Minneapolis MN, 55401 United States	Electronic Service		No	M-25-47
43	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-25-47
44	Samantha	Norris	samanthanorris@alliantenergy.com	Interstate Power and Light Company		200 1st Street SE PO Box 351 Cedar Rapids IA, 52406-0351 United States	Electronic Service		No	M-25-47
45	Lisa	Pickard	lseverson@minnkota.com	Minnkota Power Cooperative		5301 32nd Ave S Grand Forks ND, 58201 United States	Electronic Service		No	M-25-47
46	Bill	Poppert	info@technologycos.com	Technology North		2433 Highway Ave St. Paul MN, 55119 United States	Electronic Service		No	M-25-47

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
47	Dave	Reinke	dreinke@dakotaelectric.com	Dakota Electric Association		4300 220th St W Farmington MN, 55024-9583 United States	Electronic Service		No	M-25-47
48	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-25-47
49	Jean	Schafer	jeans@bepc.com	Basin Electric Power Cooperative		1717 E Interstate Ave Bismarck ND, 58501 United States	Electronic Service		No	M-25-47
50	Rick	Sisk	rsisk@trccompanies.com	Lockheed Martin		1000 Clark Ave. St. Louis MO, 63102 United States	Electronic Service		No	M-25-47
51	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-25-47
52	Anna	Sommer	asommer@energyfuturesgroup.com	Energy Futures Group		PO Box 692 Canton NY, 13617 United States	Electronic Service		No	M-25-47
53	Russ	Stark	russ.stark@ci.stpaul.mn.us	City of St. Paul		Mayor's Office 15 W. Kellogg Blvd., Suite 390 Saint Paul MN, 55102 United States	Electronic Service		No	M-25-47
54	Lauren	Steinhaeuser	lauren.steinhaeuser@xcelenergy.com	Northern States Power Company dba Xcel Energy		414 Nicollet Mall, 401-08 Minneapolis MN, 55401 United States	Electronic Service		No	M-25-47
55	Kodi	Verhalen	kverhalen@taftlaw.com	Taft Stettinius & Hollister LLP		80 S 8th St Ste 2200 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-47
56	Michael	Volker	mvolker@eastriver.coop	East River Electric Power Coop		211 S. Harth Ave Madison SD, 57042 United States	Electronic Service		No	M-25-47
57	Ethan	Warner	ethan.warner@centerpointenergy.com	CenterPoint Energy		505 Nicollet Mall Minneapolis MN, 55402 United States	Electronic Service		No	M-25-47
58	Robyn	Woeste	robynw oeste@alliantenergy.com	Interstate Power and		200 First St SE	Electronic Service		No	M-25-47

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
				Light Company		Cedar Rapids IA, 52401 United States				

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
1	Michael	Ahern	ahern.michael@dorsey.com	Dorsey & Whitney, LLP		50 S 6th St Ste 1500 Minneapolis MN, 55402-1498 United States	Electronic Service		No	M-25-48
2	Elizabeth	Aldrich	laldrich@bluesource.com	Bluesource		15669 WATERLOO CIR TRUCKEE CA, 96161 United States	Electronic Service		No	M-25-48
3	Michael	Allen	michael.allen@allenergysolar.com	All Energy Solar		721 W 26th st Suite 211 Minneapolis MN, 55405 United States	Electronic Service		No	M-25-48
4	Abby	Alter	aalter@rmi.org			2490 Junction Place Ste 200 Boulder CO, 80301 United States	Electronic Service		No	M-25-48
5	Gary	Ambach	gambach@slipstreaminc.org	Slipstream, Inc.		8973 SW Village Loop Chanhassen MN, 55317 United States	Electronic Service		No	M-25-48
6	Julie	Ambach	juliea@cmmmpa.org	Shakopee Public Utilities		255 Sarazin St Shakopee MN, 55379 United States	Electronic Service		No	M-25-48
7	Kristine	Anderson	kanderson@greatermngas.com	Greater Minnesota Gas, Inc.		1900 Cardinal Lane PO Box 798 Faribault MN, 55021 United States	Electronic Service		No	M-25-48
8	Susan	Arntz	sarntz@mankatomn.gov	City Of Mankato		P.O. Box 3368 Mankato MN, 56002-3368 United States	Electronic Service		No	M-25-48
9	Mara	Ascheman	mara.k.ascheman@xcelenergy.com	Xcel Energy		414 Nicollet Mall Fl 5 Minneapolis MN, 55401 United States	Electronic Service		No	M-25-48
10	Kevin	Auerbacher	kauerbacher@tesla.com	Tesla, Inc.		1050 K Street NW, Suite 101 Washington DC, 20001 United States	Electronic Service		No	M-25-48
11	Michael J	Auger	michael.auger@ever-greenenergy.com	Ever-Green Energy		305 Saint Peter St Saint Paul MN, 55102 United States	Electronic Service		No	M-25-48
12	Anjali	Bains	bains@fresh-energy.org	Fresh Energy		408 Saint Peter Ste 220 Saint Paul MN, 55102 United States	Electronic Service		No	M-25-48
13	Tom	Balster	tombalster@alliantenergy.com	Interstate Power & Light Company		PO Box 351 200 1st St SE Cedar Rapids IA, 52406-	Electronic Service		No	M-25-48

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
27	William	Black	bblack@mmua.org	MMUA		Suite 200 3131 Fernbrook Lane North Plymouth MN, 55447 United States	Electronic Service		No	M-25-48
28	Mike	Boughner	michael.l.boughner@xcelenergy.com	Xcel Energy		414 Nicollet Mall Minneapolis MN, 55401 United States	Electronic Service		No	M-25-48
29	Jon	Brekke	jbrekke@grenergy.com	Great River Energy		12300 Elm Creek Boulevard Maple Grove MN, 55369-4718 United States	Electronic Service		No	M-25-48
30	Matthew	Brodin	mbrodin@allete.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	M-25-48
31	Christina	Brusven	cbrusven@fredlaw.com	Fredrikson Byron		60 S 6th St Ste 1500 Minneapolis MN, 55402-4400 United States	Electronic Service		No	M-25-48
32	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-25-48
33	Roderick	Cameron	roderick.cameron@ftr.com	Frontier Communications of Minnesota, Inc.		180 South Clinton Avenue Rochester NY, 14646 United States	Electronic Service		No	M-25-48
34	James	Canaday	james.canaday@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	Suite 1400 445 Minnesota St. St. Paul MN, 55101 United States	Electronic Service		No	M-25-48
35	Melodee	Carlson Chang	melodee.carlsonchang@centerpointenergy.com	CenterPoint Energy		505 Nicollet Mall Minneapolis MN, 55402 United States	Electronic Service		No	M-25-48
36	David	Cartella	david.cartella@cliffsnr.com	Cliffs Natural Resources Inc.		200 Public Square Ste 3300 Cleveland OH, 44114-2315 United States	Electronic Service		No	M-25-48
37	Gabriel	Chan	gabechan@umn.edu			130 Hubert H. Humphrey Center 301 19th Ave S Minneapolis MN, 55455 United States	Electronic Service		No	M-25-48

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
38	Greg	Chandler	greg.chandler@upm.com	UPM Blandin Paper		115 SW First St Grand Rapids MN, 55744 United States	Electronic Service		No	M-25-48
39	Margaret	Cherne-Hendrick	cherne-hendrick@fresh-energy.org			Fresh Energy 408 Saint Peter Street, Suite 220 St. Paul MN, 55102 United States	Electronic Service		No	M-25-48
40	Cody	Chilson	cchilson@greatermngas.com	Greater Minnesota Gas, Inc. & Greater MN Transmission, LLC		1900 Cardinal Ln PO Box 798 Faribault MN, 55021 United States	Electronic Service		No	M-25-48
41	Ray	Choquette	rchoquette@agp.com	Ag Processing Inc.		12700 West Dodge Road PO Box 2047 Omaha NE, 68103-2047 United States	Electronic Service		No	M-25-48
42	Steve W.	Chriss	stephen.chriss@walmart.com	Wal-Mart		2001 SE 10th St. Bentonville AR, 72716-5530 United States	Electronic Service		No	M-25-48
43	John	Coffman	john@johncoffman.net	AARP		871 Tuxedo Blvd. St. Louis MO, 63119-2044 United States	Electronic Service		No	M-25-48
44	Sheri	Comer	sheri.comer@ftr.com	Frontier Communications Corporation		1500 MacCorkle Ave SE Charleston WV, 25396 United States	Electronic Service		No	M-25-48
45	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-25-48
46	Jean	Comstock	jean.comstock.dbcc@gmail.com	St. Paul 350		729 6th St E St. Paul MN, 55106 United States	Electronic Service		No	M-25-48
47	Hillary	Creurer	hcreurer@allete.com	Minnesota Power		30 W Superior St Duluth MN, 55802 United States	Electronic Service		No	M-25-48
48	George	Crocker	gwilc@nawo.org	North American Water Office		5093 Keats Avenue Lake Elmo MN, 55042 United States	Electronic Service		No	M-25-48
49	Joseph	Dammel	dammel@fresh-energy.org	Fresh Energy		408 Saint Peter St Ste 350 St. Paul MN,	Electronic Service		No	M-25-48

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						55102 United States				
50	Lisa	Daniels	lisadaniels@w industry.org	Windustry		201 Ridgew ood Ave Minneapolis MN, 55403 United States	Electronic Service		No	M-25-48
51	Seth	DeMerritt	seth.demerritt@centerpointenergy.com	CenterPoint Energy Minnesota Gas		505 Nicollet Mall Minneapolis MN, 55402 United States	Electronic Service		No	M-25-48
52	James	Denniston	james.r.denniston@xcelenergy.com	Xcel Energy Services, Inc.		414 Nicollet Mall, 401-8 Minneapolis MN, 55401 United States	Electronic Service		No	M-25-48
53	Carrie	Desmond	carrie.desmond@metrotransit.org	Metropolitan Council		560 6th Avenue North Minneapolis MN, 55411 United States	Electronic Service		No	M-25-48
54	Bridget	Dockter	bridget.dockter@xcelenergy.com			null null, null United States	Electronic Service		No	M-25-48
55	J.	Drake Hamilton	hamilton@fresh-energy.org	Fresh Energy		408 St Peter St Ste 350 Saint Paul MN, 55101 United States	Electronic Service		No	M-25-48
56	Charles	Drayton	charles.drayton@enbridge.com	Enbridge Energy Company, Inc.		7701 France Ave S Ste 600 Edina MN, 55435 United States	Electronic Service		No	M-25-48
57	Michelle	Dreier	mdreier@electricalassociation.com			null null, null United States	Electronic Service		No	M-25-48
58	Brian	Edstrom	briane@cubminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota St Ste W1360 Saint Paul MN, 55101 United States	Electronic Service		No	M-25-48
59	Ron	Elw ood	relw ood@mnl sap.org	Legal Services Advocacy Project		970 Raymond Avenue Suite G-40 Saint Paul MN, 55114 United States	Electronic Service		No	M-25-48
60	Jim	Erchul	jerchul@dbnhs.org	Daytons Bluff Neighborhood Housing Sv.		823 E 7th St St. Paul MN, 55106 United States	Electronic Service		No	M-25-48
61	Greg	Ernst	gaernst@q.com	G. A. Ernst & Associates, Inc.		2377 Union Lake Trl Northfield MN, 55057 United States	Electronic Service		No	M-25-48
62	John	Farrell	jfarrell@ilsr.org	Institute for Local Self-Reliance		2720 E. 22nd St Institute for Local Self-Reliance	Electronic Service		No	M-25-48

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						Minneapolis MN, 55406 United States				
63	Eric	Fehlhaber	efehlhaber@dakotaelectric.com	Dakota Electric Association		4300 220th St W Farmington MN, 55024 United States	Electronic Service		No	M-25-48
64	Melissa S	Feine	melissa.feine@semcac.org	SEMCAC		PO Box 549 204 S Elm St Rushford MN, 55971 United States	Electronic Service		No	M-25-48
65	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-25-48
66	Mike	Fiterman	mikefiterman@libertydiversified.com	Liberty Diversified International		5600 N Highway 169 Minneapolis MN, 55428-3096 United States	Electronic Service		No	M-25-48
67	Karolanne	Foley	karolanne.foley@dairylandpower.com	Dairyland Power Cooperative		PO Box 817 La Crosse WI, 54602-0817 United States	Electronic Service		No	M-25-48
68	Lucas	Franco	lfranco@liunagroc.com	LIUNA		81 Little Canada Rd E Little Canada MN, 55117 United States	Electronic Service		No	M-25-48
69	Daryll	Fuentes	energy@usg.com	USG Corporation		550 W Adams St Chicago IL, 60661 United States	Electronic Service		No	M-25-48
70	James	Garness	james.r.garness@xcelenergy.com			null null, null United States	Electronic Service		No	M-25-48
71	Edward	Garvey	garveyed@aol.com	Residence		32 Lawton St Saint Paul MN, 55102 United States	Electronic Service		No	M-25-48
72	John	Gasele	ygasele@fryberger.com	Fryberger Buchanan Smith & Frederick PA		700 Lonsdale Building 302 W Superior St Ste 700 Duluth MN, 55802 United States	Electronic Service		No	M-25-48
73	Allen	Gleckner	gleckner@fresh-energy.org	Fresh Energy		408 St. Peter Street Ste 350 Saint Paul MN, 55102 United States	Electronic Service		No	M-25-48
74	Tyler	Glewwe	tyler.glewwe@centerpointenergy.com	CenterPoint Energy		505 Nicollet Mall Minneapolis MN, 55402 United States	Electronic Service		No	M-25-48
75	Jenny	Glumack	jenny@mrea.org	Minnesota Rural Electric		11640 73rd Ave N	Electronic Service		No	M-25-48

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
				Association		Maple Grove MN, 55369 United States				
76	Debbie	Goettel	debbie.goettel@hennepin.us	Partnership on Waste and Energy		2785 White Bear Ave N Ste 350 Maplewood MN, 55109 United States	Electronic Service		No	M-25-48
77	Anita	Grace	anita@gracemulticultural.com	GRACE Multicultural		12959 196th LN NW Elk River MN, 55330 United States	Electronic Service		No	M-25-48
78	Jason	Grenier	jgrenier@otpc.com	Otter Tail Power Company		215 South Cascade Street Fergus Falls MN, 56537 United States	Electronic Service		No	M-25-48
79	Jeffrey	Haase	jhaase@greenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	M-25-48
80	Jerome	Hall	hallj@stlouiscountymn.gov	Saint Louis County Property Mgmt Dept		Duluth Courthouse 100 N 5th Ave W Rm 515 Duluth MN, 55802-1209 United States	Electronic Service		No	M-25-48
81	Joe	Halso	joe.halso@sierraclub.org	Sierra Club		1536 Wynkoop St Ste 200 Denver CO, 80202 United States	Electronic Service		No	M-25-48
82	Kim	Havey	kim.havey@minneapolismn.gov	City of Minneapolis		350 South 5th Street, Suite 315M Minneapolis MN, 55415 United States	Electronic Service		No	M-25-48
83	Philip	Hayet	phayet@jkenn.com	J. Kennedy and Associates, Inc.		570 Colonial Park Drive Suite 305 Roswell GA, 30075-3770 United States	Electronic Service		No	M-25-48
84	Adam	Heinen	aheinen@dakotaelectric.com	Dakota Electric Association		4300 220th St W Farmington MN, 55024 United States	Electronic Service		No	M-25-48
85	Mike	Henchen	mhenchen@rmi.org	Rocky Mountain Institute (RMI)		null null, null United States	Electronic Service		No	M-25-48
86	Annete	Henkel	mui@mnutilityinvestors.org	Minnesota Utility Investors		413 Wacouta Street #230 St.Paul MN, 55101 United States	Electronic Service		No	M-25-48
87	Katherine	Hinderlie	katherine.hinderlie@ag.state.mn.us		Office of the Attorney General -	445 Minnesota St Suite 1400	Electronic Service		No	M-25-48

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
					Residential Utilities Division	St. Paul MN, 55101-2134 United States				
88	Corey	Hintz	chintz@dakotaelectric.com	Dakota Electric Association		4300 220th Street Farmington MN, 55024-9583 United States	Electronic Service		No	M-25-48
89	Bruce L.	Hoffarber	bhoffarber@kinectenergy.com	Kinect Energy Group		605 North Highway 169 Ste 1200 Plymouth MN, 55441 United States	Electronic Service		No	M-25-48
90	Joe	Hoffman	ja.hoffman@smmpa.org	SMMPA		500 First Ave SW Rochester MN, 55902-3303 United States	Electronic Service		No	M-25-48
91	Joylyn C	Hoffman Malueg	joylyn.hoffmanmalueg@wecenergygroup.com	Minnesota Energy Resources		2685 145th St W Rosemount MN, 55068 United States	Electronic Service		No	M-25-48
92	Michael	Hoppe	lu23@ibew 23.org	Local Union 23, I.B.E.W.		445 Etna Street Ste. 61 St. Paul MN, 55106 United States	Electronic Service		No	M-25-48
93	MJ	Horner	mj.horner@xcelenergy.com			null null, null United States	Electronic Service		No	M-25-48
94	Samantha	Houston	shouston@ucsusa.org	Union of Concerned Scientists		1825 K St. NW Ste 800 Washington DC, 20006 United States	Electronic Service		No	M-25-48
95	Lori	Hoyum	lhoyum@mpower.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	M-25-48
96	John	Jaimez	john.jaimez@hennepin.us			Environment & Energy Department 701 4th Ave S Minneapolis MN, 55415 United States	Electronic Service		No	M-25-48
97	Alan	Jenkins	aj@jenkinsatlaw.com	Jenkins at Law		2950 Yellow tail Ave. Marathon FL, 33050 United States	Electronic Service		No	M-25-48
98	Dave	Johnson	dave.johnson@aeoa.org	Arrow head Economic Opportunity Agency		702 3rd Ave S Virginia MN, 55792 United States	Electronic Service		No	M-25-48
99	Kelsey	Johnson	kjohnson@taconite.org	Iron Mining Association of Minnesota		1003 Discovery Drive	Electronic Service		No	M-25-48

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						Chisholm MN, 55719 United States				
100	Richard	Johnson	rick.johnson@law moss.com	Moss & Barnett		150 S. 5th Street Suite 1200 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-48
101	Sarah	Johnson Phillips	sjphillips@stoel.com	Stoel Rives LLP		33 South Sixth Street Suite 4200 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-48
102	Philip	Jones	phil@philjonesconsulting.com	Alliance for Transportation Electrification		1402 3rd Ave Ste 1315 Seattle WA, 98101 United States	Electronic Service		No	M-25-48
103	Brendan	Jordan	bjordan@gpisd.net	Great Plains Institute & Bioeconomy Coalition of MN		2801 21st Ave S Ste 220 Minneapolis MN, 55407 United States	Electronic Service		No	M-25-48
104	Cliff	Kaehler	cliff.kaehler@novelenergy.biz	Novel Energy Solutions LLC		4710 Blaylock Way Inver Grove Heights MN, 55076 United States	Electronic Service		No	M-25-48
105	David	Kailbourne	edk@revlng.com	REV LNG, LLC		1002 Empson Rd Ulysses PA, 16948 United States	Electronic Service		No	M-25-48
106	D	Kalmon	dkalmon@mw mo.org	Mississippi Watershed Management Organization		2522 Marshall St NE Minneapolis MN, 55418-3329 United States	Electronic Service		No	M-25-48
107	Nick	Kaneski	nick.kaneski@enbridge.com	Enbridge Energy Company, Inc.		11 East Superior St Ste 125 Duluth MN, 55802 United States	Electronic Service		No	M-25-48
108	Martin	Kapsch	martin.kapsch@centerpointenergy.com	CenterPoint Energy Minnesota Gas		505 Nicollet Mall Minneapolis MN, 55402 United States	Electronic Service		No	M-25-48
109	Stacey	Karels	skarels@local563.org	Mankato Area Bldg & Construction Trades Council		310 McKinzie St Mankato MN, 56001 United States	Electronic Service		No	M-25-48
110	Samuel B.	Ketchum	sketchum@kennedy-graven.com	Kennedy & Graven, Chartered		150 S 5th St Ste 700 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-48
111	Deborah	Knoll	dknoll@mnpower.com	Minnesota Power		30 W Superior St Duluth MN,	Electronic Service		No	M-25-48

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						55802 United States				
112	Kathryn	Knudson	kathryn.knudson@centerpointenergy.com	CenterPoint Energy Minnesota Gas		null null, null United States	Electronic Service		No	M-25-48
113	Tina	Koecher	tkoecher@mnpower.com	Minnesota Power		30 W Superior St Duluth MN, 55802-2093 United States	Electronic Service		No	M-25-48
114	Frank	Kohlasch	frank.kohlasch@state.mn.us		Minnesota Pollution Control Agency	520 Lafayette Rd N. St. Paul MN, 55155 United States	Electronic Service		No	M-25-48
115	Michael	Krikava	mkrikava@taftlaw.com	Taft Stettinius & Hollister LLP		2200 IDS Center 80 S 8th St Minneapolis MN, 55402 United States	Electronic Service		No	M-25-48
116	Allen	Krug	allen.krug@xcelenergy.com	Xcel Energy		414 Nicollet Mall-7th fl Minneapolis MN, 55401 United States	Electronic Service		No	M-25-48
117	Nicolle	Kupser	nkupser@greatermngas.com	Greater Minnesota Gas, Inc.		1900 Cardinal Ln PO Box 798 Faribault MN, 55021 United States	Electronic Service		No	M-25-48
118	Brenda	Kyle	bkyle@stpaulchamber.com	St. Paul Area Chamber of Commerce		401 N Robert Street Suite 150 St Paul MN, 55101 United States	Electronic Service		No	M-25-48
119	Carmel	Laney	carmel.laney@stoel.com	Stoel Rives LLP		33 South Sixth Street Suite 4200 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-48
120	David	Langmo	david.langmo@sappi.com	Sappi North America		P O Box 511 2201 Avenue B Cloquet MN, 55720 United States	Electronic Service		No	M-25-48
121	James D.	Larson	james.larson@avantenergy.com	Avant Energy Services		220 S 6th St Ste 1300 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-48
122	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-25-48
123	Kevin	Lee	klee@bluegreenalliance.org	BlueGreen Alliance		2701 University Ave SE Ste. 209 Minneapolis	Electronic Service		No	M-25-48

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						MN, 55414 United States				
124	Samuel	Lehr	sam.lehr@rngcoalition.com	Coalition for Renew able Natural Gas		1017 L St #513 Sacramento CA, 95814 United States	Electronic Service		No	M-25-48
125	Robert	Lems	administration@dmf-cgs.com	DMT Clear Gas Solutions		19125 SW 125th Ct Tualatin OR, 97062 United States	Electronic Service		No	M-25-48
126	Rachel	Leonard	rachel.leonard@ci.monticello.mn.us	City of Monticello		505 Walnut St Ste 1 Monticello MN, 55362 United States	Electronic Service		No	M-25-48
127	Martin	Lepak	martin.lepak@aeoa.org	Arrow head Economic Opportunity		702 S 3rd Ave Virginia MN, 55792 United States	Electronic Service		No	M-25-48
128	Annie	Levenson Falk	annief@cubminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota Street, Suite W1360 St. Paul MN, 55101 United States	Electronic Service		No	M-25-48
129	Amy	Liberkow ski	amy.a.liberkow ski@xcelenergy.com	Xcel Energy		414 Nicollet Mall 7th Floor Minneapolis MN, 55401- 1993 United States	Electronic Service		No	M-25-48
130	Ryan	Long	ryan.j.long@xcelenergy.com			414 Nicollet Mall 401 8th Floor Minneapolis MN, 55401 United States	Electronic Service		No	M-25-48
131	Jason	Loos	jason.loos@centerpointenergy.com	CenterPoint Energy Resources Corp.		505 Nicollet Mall 3rd Floor Minneapolis MN, 55402 United States	Electronic Service		No	M-25-48
132	Corey	Lubovich	coreyl@hpuc.com	Hibbing Public Utilities Commission		1902 6th Ave E Hibbing MN, 55746 United States	Electronic Service		No	M-25-48
133	Susan	Ludw ig	sludw ig@mnpow er.com	Minnesota Pow er		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	M-25-48
134	Kavita	Maini	kmairi@wi.rr.com	KM Energy Consulting, LLC		961 N Lost Woods Rd Oconomow oc WI, 53066 United States	Electronic Service		No	M-25-48
135	Discovery	Manager	discoverymanager@mnpow er.com	Minnesota Pow er		30 W Superior St Duluth MN,	Electronic Service		No	M-25-48

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						55802 United States				
136	Sarah	Manchester	sarah.manchester@sappi.com	Sappi North American		255 State Street Floor 4 Boston MA, 02109-2617 United States	Electronic Service		No	M-25-48
137	Nicole	Manion	nmanion@mnpower.com	Minnesota Power		30 West Superior Street Duluth MN, 55802-2093 United States	Electronic Service		No	M-25-48
138	Christine	Marquis	regulatory.records@xcelenergy.com	Xcel Energy		414 Nicollet Mall MN1180-07-MCA Minneapolis MN, 55401 United States	Electronic Service		No	M-25-48
139	Emily	Marshall	emarshall@lourismarshall.com	Miller O'Brien Jensen, PA		120 S. 6th Street Suite 2400 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-48
140	Nicholas	Martin	nicholas.f.martin@xcelenergy.com	Xcel Energy		414 Nicollet Mall 7th floor Minneapolis MN, 55401 United States	Electronic Service		No	M-25-48
141	Linda	Martinez	lmartinez@auri.org	Agricultural Utilization Research Institute		null null, null United States	Electronic Service		No	M-25-48
142	Mary	Martinka	mary.a.martinka@xcelenergy.com	Xcel Energy Inc		414 Nicollet Mall 7th Floor Minneapolis MN, 55401 United States	Electronic Service		No	M-25-48
143	Josh	Mason	jmason@rpu.org	Rochester Public Utilities		4000 E River Rd NE Rochester MN, 55906 United States	Electronic Service		No	M-25-48
144	Daryl	Maxwell	dmaxwell@hydro.mb.ca	Manitoba Hydro		360 Portage Ave FL 16 PO Box 815, Station Main Winnipeg MB, R3C 2P4 Canada	Electronic Service		No	M-25-48
145	Scot	McClure	scotmcclure@alliantenergy.com	Interstate Power And Light Company		4902 N Biltmore Ln PO Box 77007 Madison WI, 53707-1007 United States	Electronic Service		No	M-25-48
146	Natalie	McIntire	natalie.mcintire@gmail.com	Wind on the Wires		570 Asbury St Ste 201 Saint Paul MN, 55104-1850 United States	Electronic Service		No	M-25-48

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
159	Carl	Nelson	cnelson@mncee.org	Center for Energy and Environment		212 3rd Ave N Ste 560 Minneapolis MN, 55401 United States	Electronic Service		No	M-25-48
160	David	Niles	david.niles@avantenergy.com	Minnesota Municipal Pow er Agency		220 South Sixth Street Suite 1300 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-48
161	Michael	Noble	noble@fresh-energy.org	Fresh Energy		408 Saint Peter St Ste 350 Saint Paul MN, 55102 United States	Electronic Service		No	M-25-48
162	Rolf	Nordstrom	rnordstrom@gpisd.net	Great Plains Institute		2801 21ST AVE S STE 220 Minneapolis MN, 55407-1229 United States	Electronic Service		No	M-25-48
163	Samantha	Norris	samanthanorris@alliantenergy.com	Interstate Pow er and Light Company		200 1st Street SE PO Box 351 Cedar Rapids IA, 52406-0351 United States	Electronic Service		No	M-25-48
164	M. William	O'Brien	bobrien@mojlaw.com	Miller O'Brien Jensen, P.A.		120 S 6th St Ste 2400 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-48
165	Ric	O'Connell	ric@gridlab.org	GridLab		2120 University Ave Berkeley CA, 94704 United States	Electronic Service		No	M-25-48
166	Logan	O'Grady	logrady@mnseia.org	Minnesota Solar Energy Industries Association		2288 University Ave W St. Paul MN, 55114 United States	Electronic Service		No	M-25-48
167	Matthew	Olsen	molsen@otpc.com	Otter Tail Pow er Company		215 South Cascade Street Fergus Falls MN, 56537 United States	Electronic Service		No	M-25-48
168	Debra	Opatz	dopatz@otpc.com	Otter Tail Pow er Company		215 South Cascade Street Fergus Falls MN, 56537 United States	Electronic Service		No	M-25-48
169	Christopher J.	Oppitz		-		PO Box 910 Park Rapids MN, 56470-0910 United States	Paper Service		No	M-25-48
170	Nate	O'Reilly	nate@iron512.com			851 Pierce Butler Route	Electronic Service		No	M-25-48

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						St Paul MN, 55104 United States				
171	Carol A.	Overland	overland@legalelectric.org	Legaletric - Overland Law Office		1110 West Avenue Red Wing MN, 55066 United States	Electronic Service		No	M-25-48
172	John	Pacheco	johnpachecojr@gmail.com			null null, null United States	Electronic Service		No	M-25-48
173	Greg	Palmer	gpalmer@greatermngas.com	Greater Minnesota Gas, Inc.		1900 Cardinal Ln PO Box 798 Faribault MN, 55021 United States	Electronic Service		No	M-25-48
174	Jessica	Palmer Denig	jessica.palmer-denig@state.mn.us		Office of Administrative Hearings	600 Robert St N PO Box 64620 St. Paul MN, 55164 United States	Electronic Service		No	M-25-48
175	Antonio	Parisi	aparisi@sacyr.com	Sacyr Environment USA LLC		3330 Washington Blvd Ste 400 Arlington VA, 22201 United States	Electronic Service		No	M-25-48
176	Dean	Paw low ski	dpaw low ski@otpc.com	Otter Tail Pow er Company		PO Box 496 215 S. Cascade St. Fergus Falls MN, 56537-0496 United States	Electronic Service		No	M-25-48
177	Jose	Perez	jose@hispanicsinenergy.com			1017 L Street #719 Sacramento CA, 95814 United States	Electronic Service		No	M-25-48
178	Jennifer	Peterson	jjpeterson@mnpow er.com	Minnesota Pow er		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	M-25-48
179	Leah	Peterson	lpeterson@mnpow er.com	Minnesota Pow er		30 West Superior St Duluth MN, 55802 United States	Electronic Service		No	M-25-48
180	Catherine	Phillips	catherine.phillips@w ecenergygroup.com	Minnesota Energy Resources		231 West Michigan St Milw aukee WI, 53203 United States	Electronic Service		No	M-25-48
181	Lisa	Pickard	lseverson@minnkota.com	Minnkota Pow er Cooperative		5301 32nd Ave S Grand Forks ND, 58201 United States	Electronic Service		No	M-25-48
182	Marcia	Podratz	mpodratz@mnpow er.com	Minnesota Pow er		30 W Superior S Duluth MN,	Electronic Service		No	M-25-48

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						55802 United States				
183	Bill	Poppert	info@technologycos.com	Technology North		2433 Highway Ave St. Paul MN, 55119 United States	Electronic Service		No	M-25-48
184	J.	Porter	greg.porter@nngco.com	Northern Natural Gas Company		1111 South 103rd St Omaha NE, 68124 United States	Electronic Service		No	M-25-48
185	Kevin	Pranis	kpranis@liunagroc.com	Laborers' District Council of MN and ND		81 E Little Canada Road St. Paul MN, 55117 United States	Electronic Service		No	M-25-48
186	David G.	Prazak	dprazak@otpc.com	Otter Tail Power Company		P.O. Box 496 215 South Cascade Street Fergus Falls MN, 56538-0496 United States	Electronic Service		No	M-25-48
187	Rate Case Inbox	Rate Case Inbox	mnrates@otpc.com	Otter Tail		null null, null United States	Electronic Service		No	M-25-48
188	Dave	Reinke	dreinke@dakotaelectric.com	Dakota Electric Association		4300 220th St W Farmington MN, 55024-9583 United States	Electronic Service		No	M-25-48
189	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-25-48
190	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-25-48
191	Buddy	Robinson	buddy@citizensfed.org	Minnesota Citizens Federation NE		2110 W. 1st Street Duluth MN, 55806 United States	Electronic Service		No	M-25-48
192	Susan	Romans	sromans@allete.com	Minnesota Power		30 West Superior Street Legal Dept Duluth MN, 55802 United States	Electronic Service		No	M-25-48
193	Amanda	Rome	amanda.rome@xcelenergy.com	Xcel Energy		414 Nicollet Mall FL 5 Minneapolis MN, 55401 United States	Electronic Service		No	M-25-48
194	Nathaniel	Runke	nrunke@local49.org			611 28th St. NW	Electronic Service		No	M-25-48

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
240	Casey	Whelan	cw helan@kinectenergy.com	Kinect Energy Group		605 Highway 169 N Ste 1200 Plymouth MN, 55441 United States	Electronic Service		No	M-25-48
241	Laurie	Williams	laurie.williams@sierraclub.org	Sierra Club		Environmental Law Program 1536 Wynkoop St Ste 200 Denver CO, 80202 United States	Electronic Service		No	M-25-48
242	Justin	Wilson	justin.wilson@chargepoint.com	ChargePoint		240 East Hacienda Ave. Campbell CA, 95008 United States	Electronic Service		No	M-25-48
243	Joseph	Windler	jw indler@w inthrop.com	Winthrop & Weinstine		225 South Sixth Street, Suite 3500 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-48
244	Robyn	Woeste	robynwoeste@alliantenergy.com	Interstate Power and Light Company		200 First St SE Cedar Rapids IA, 52401 United States	Electronic Service		No	M-25-48
245	Grant	Zimmerman	gzimmerman@ampamericas.com	Amp Americas		811 W Evergreen Ave Ste 201 Chicago IL, 60642 United States	Electronic Service		No	M-25-48
246	Kurt	Zimmerman	kwz@ibew160.org	Local Union #160, IBEW		2909 Anthony Ln St Anthony Village MN, 55418-3238 United States	Electronic Service		No	M-25-48
247	Patrick	Zomer	pat.zomer@lawmoss.com	Moss & Barnett PA		150 S 5th St #1200 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-48

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
1	Julie	Ambach	juliea@cmmmpa.org	Shakopee Public Utilities		255 Sarazin St Shakopee MN, 55379 United States	Electronic Service		No	M-25-49
2	Anjali	Bains	bains@fresh-energy.org	Fresh Energy		408 Saint Peter Ste 220 Saint Paul MN, 55102 United States	Electronic Service		No	M-25-49
3	Tom	Balster	tombalster@alliantenergy.com	Interstate Power & Light Company		PO Box 351 200 1st St SE Cedar Rapids IA, 52406-0351 United States	Electronic Service		No	M-25-49
4	Lisa	Beckner	lbeckner@mnpower.com	Minnesota Power		30 W Superior St Duluth MN, 55802 United States	Electronic Service		No	M-25-49
5	Sasha	Bergman	sasha.bergman@state.mn.us		Public Utilities Commission		Electronic Service		Yes	M-25-49
6	William	Black	bblack@mmua.org	MMUA		Suite 200 3131 Fernbrook Lane North Plymouth MN, 55447 United States	Electronic Service		No	M-25-49
7	Annika	Brindel	abrindel@nhtinc.org	National Housing Trust		1101 30th Street NW Ste 100A Washington DC, 20007 United States	Electronic Service		No	M-25-49
8	Matthew	Brodin	mbrodin@allete.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	M-25-49
9	Christina	Brusven	cbrusven@fredlaw.com	Fredrikson Byron		60 S 6th St Ste 1500 Minneapolis MN, 55402-4400 United States	Electronic Service		No	M-25-49
10	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-25-49
11	Ray	Choquette	rchoquette@agp.com	Ag Processing Inc.		12700 West Dodge Road PO Box 2047 Omaha NE, 68103-2047 United States	Electronic Service		No	M-25-49
12	Generic	Commerce Attorneys	commerce.attorneys@ag.state.mn.us		Office of the Attorney General -	445 Minnesota Street Suite 1400 St. Paul MN,	Electronic Service		Yes	M-25-49

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
					Department of Commerce	55101 United States				
13	George	Crocker	gw illc@naw o.org	North American Water Office		5093 Keats Avenue Lake Elmo MN, 55042 United States	Electronic Service		No	M-25-49
14	Charles	Drayton	charles.drayton@enbridge.com	Enbridge Energy Company, Inc.		7701 France Ave S Ste 600 Edina MN, 55435 United States	Electronic Service		No	M-25-49
15	Jim	Erchul	jerchul@dbnhs.org	Daytons Bluff Neighborhood Housing Sv.		823 E 7th St St. Paul MN, 55106 United States	Electronic Service		No	M-25-49
16	Greg	Ernst	gaernst@q.com	G. A. Ernst & Associates, Inc.		2377 Union Lake Trl Northfield MN, 55057 United States	Electronic Service		No	M-25-49
17	Melissa S	Feine	melissa.feine@semcac.org	SEMCAAC		PO Box 549 204 S Elm St Rushford MN, 55971 United States	Electronic Service		No	M-25-49
18	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-25-49
19	Karolanne	Foley	karolanne.foley@dairylandpow er.com	Dairyland Pow er Cooperative		PO Box 817 La Crosse WI, 54602-0817 United States	Electronic Service		No	M-25-49
20	Jessica	Fyhrie	jfyhrie@otpc.com	Otter Tail Pow er Company		PO Box 496 Fergus Falls MN, 56538-0496 United States	Electronic Service		No	M-25-49
21	Tyler	Glew w e	tyler.glew w e@centerpointenergy.com	CenterPoint Energy		505 Nicollet Mall Minneapolis MN, 55402 United States	Electronic Service		No	M-25-49
22	Elizabeth	Glidden	elizabeth.glidden@mhponline.org	Minnesota Housing Partnership		2446 University Ave W Ste 140 St Paul MN, 55114 United States	Electronic Service		No	M-25-49
23	Jenny	Glumack	jenny@mrea.org	Minnesota Rural Electric Association		11640 73rd Ave N Maple Grove MN, 55369 United States	Electronic Service		No	M-25-49
24	Laura	Goldberg	lgoldberg@nrdc.org	Natural Resources Defense Council		20 N. Upper Wacker Dr. Suite 1600 Chicago IL, 60606 United States	Electronic Service		No	M-25-49

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
25	Jason	Grenier	jgrenier@otpc.com	Otter Tail Power Company		215 South Cascade Street Fergus Falls MN, 56537 United States	Electronic Service		No	M-25-49
26	Jeffrey	Haase	jhaase@grenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	M-25-49
27	Adam	Heinen	aheinen@dakotaelectric.com	Dakota Electric Association		4300 220th St W Farmington MN, 55024 United States	Electronic Service		No	M-25-49
28	Joe	Hoffman	ja.hoffman@smmpa.org	SMMPA		500 First Ave SW Rochester MN, 55902-3303 United States	Electronic Service		No	M-25-49
29	Dave	Johnson	dave.johnson@aeoa.org	Arrow head Economic Opportunity Agency		702 3rd Ave S Virginia MN, 55792 United States	Electronic Service		No	M-25-49
30	Nick	Kaneski	nick.kaneski@enbridge.com	Enbridge Energy Company, Inc.		11 East Superior St Ste 125 Duluth MN, 55802 United States	Electronic Service		No	M-25-49
31	Martin	Kapsch	martin.kapsch@centerpointenergy.com	CenterPoint Energy Minnesota Gas		505 Nicollet Mall Minneapolis MN, 55402 United States	Electronic Service		No	M-25-49
32	Deborah	Knoll	dknoll@mpow er.com	Minnesota Pow er		30 W Superior St Duluth MN, 55802 United States	Electronic Service		No	M-25-49
33	Kathryn	Knudson	kathryn.knudson@centerpointenergy.com	CenterPoint Energy Minnesota Gas		null null, null United States	Electronic Service		No	M-25-49
34	Tina	Koecher	tkoecher@mpow er.com	Minnesota Pow er		30 W Superior St Duluth MN, 55802-2093 United States	Electronic Service		No	M-25-49
35	James D.	Larson	james.larson@avantenergy.com	Avant Energy Services		220 S 6th St Ste 1300 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-49
36	Martin	Lepak	martin.lepak@aeoa.org	Arrow head Economic Opportunity		702 S 3rd Ave Virginia MN, 55792 United States	Electronic Service		No	M-25-49
37	Corey	Lubovich	coreyl@hpuc.com	Hibbing Public Utilities Commission		1902 6th Ave E Hibbing MN,	Electronic Service		No	M-25-49

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						55746 United States				
38	Kavita	Maini	kmaini@wi.rr.com	KM Energy Consulting, LLC		961 N Lost Woods Rd Oconomowoc WI, 53066 United States	Electronic Service		No	M-25-49
39	Christine	Marquis	regulatory.records@xcelenergy.com	Xcel Energy		414 Nicollet Mall MN1180-07-MCA Minneapolis MN, 55401 United States	Electronic Service		No	M-25-49
40	Josh	Mason	jmason@rpu.org	Rochester Public Utilities		4000 E River Rd NE Rochester MN, 55906 United States	Electronic Service		No	M-25-49
41	Scot	McClure	scotmcclure@alliantenergy.com	Interstate Power And Light Company		4902 N Biltmore Ln PO Box 77007 Madison WI, 53707-1007 United States	Electronic Service		No	M-25-49
42	David	Moeller	dmoeller@allete.com	Minnesota Power			Electronic Service		No	M-25-49
43	Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP		33 South Sixth St Ste 4200 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-49
44	Carl	Nelson	cnelson@mncee.org	Center for Energy and Environment		212 3rd Ave N Ste 560 Minneapolis MN, 55401 United States	Electronic Service		No	M-25-49
45	Samantha	Norris	samanthanorris@alliantenergy.com	Interstate Power and Light Company		200 1st Street SE PO Box 351 Cedar Rapids IA, 52406-0351 United States	Electronic Service		No	M-25-49
46	Matthew	Olsen	molsen@otpc.com	Otter Tail Power Company		215 South Cascade Street Fergus Falls MN, 56537 United States	Electronic Service		No	M-25-49
47	Lisa	Pickard	lseverson@minnkota.com	Minnkota Power Cooperative		5301 32nd Ave S Grand Forks ND, 58201 United States	Electronic Service		No	M-25-49
48	Bill	Poppert	info@technologycos.com	Technology North		2433 Highway Ave St. Paul MN, 55119 United States	Electronic Service		No	M-25-49
49	Generic Notice	Regulatory	regulatory_filing_coordinators@otpc.com	Otter Tail Power Company		215 S. Cascade Street Fergus Falls	Electronic Service		No	M-25-49

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
61	Ethan	Warner	ethan.w arner@centerpointenergy.com	CenterPoint Energy		505 Nicollet Mall Minneapolis MN, 55402 United States	Electronic Service		No	M-25-49
62	Robyn	Woeste	robynw oeste@alliantenergy.com	Interstate Power and Light Company		200 First St SE Cedar Rapids IA, 52401 United States	Electronic Service		No	M-25-49
63	Cristina	Zuniga	czuniga@otpc.com	Otter Tail Power Company		215 South Cascade Street PO Box 496 Fergus Falls MN, 56538 United States	Electronic Service		No	M-25-49

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
1	Julie	Ambach	juliea@cmmmpa.org	Shakopee Public Utilities		255 Sarazin St Shakopee MN, 55379 United States	Electronic Service		No	M-25-50
2	Tom	Balster	tombalster@alliantenergy.com	Interstate Power & Light Company		PO Box 351 200 1st St SE Cedar Rapids IA, 52406-0351 United States	Electronic Service		No	M-25-50
3	Lisa	Beckner	lbeckner@mnpower.com	Minnesota Power		30 W Superior St Duluth MN, 55802 United States	Electronic Service		No	M-25-50
4	Sasha	Bergman	sasha.bergman@state.mn.us		Public Utilities Commission		Electronic Service		Yes	M-25-50
5	William	Black	bblack@mmua.org	MMUA		Suite 200 3131 Fernbrook Lane North Plymouth MN, 55447 United States	Electronic Service		No	M-25-50
6	Matthew	Brodin	mbrodin@allete.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	M-25-50
7	Christina	Brusven	cbrusven@fredlaw.com	Fredrikson Byron		60 S 6th St Ste 1500 Minneapolis MN, 55402-4400 United States	Electronic Service		No	M-25-50
8	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-25-50
9	Ray	Choquette	rchoquette@agp.com	Ag Processing Inc.		12700 West Dodge Road PO Box 2047 Omaha NE, 68103-2047 United States	Electronic Service		No	M-25-50
10	John	Coffman	john@johncoffman.net	AARP		871 Tuxedo Blvd. St, Louis MO, 63119-2044 United States	Electronic Service		No	M-25-50
11	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-25-50
12	George	Crocker	gw illc@naw o.org	North American		5093 Keats Avenue	Electronic Service		No	M-25-50

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
				Water Office		Lake Elmo MN, 55042 United States				
13	Charles	Drayton	charles.drayton@enbridge.com	Enbridge Energy Company, Inc.		7701 France Ave S Ste 600 Edina MN, 55435 United States	Electronic Service		No	M-25-50
14	Christopher	Droske	christopher.droske@minneapolismn.gov	Northern States Pow er Company dba Xcel Energy- Elec		661 5th Ave N Minneapolis MN, 55405 United States	Electronic Service		No	M-25-50
15	Jim	Erchul	jerchul@dbnhs.org	Daytons Bluff Neighborhood Housing Sv.		823 E 7th St St. Paul MN, 55106 United States	Electronic Service		No	M-25-50
16	Greg	Ernst	gaernst@q.com	G. A. Ernst & Associates, Inc.		2377 Union Lake Trl Northfield MN, 55057 United States	Electronic Service		No	M-25-50
17	John	Farrell	jfarrell@llsr.org	Institute for Local Self-Reliance		2720 E. 22nd St Institute for Local Self-Reliance Minneapolis MN, 55406 United States	Electronic Service		No	M-25-50
18	Melissa S	Feine	melissa.feine@semcac.org	SEMCAC		PO Box 549 204 S Elm St Rushford MN, 55971 United States	Electronic Service		No	M-25-50
19	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-25-50
20	Karolanne	Foley	karolanne.foley@dairylandpow er.com	Dairyland Pow er Cooperative		PO Box 817 La Crosse WI, 54602-0817 United States	Electronic Service		No	M-25-50
21	Tyler	Glew w e	tyler.glew w e@centerpointenergy.com	CenterPoint Energy		505 Nicollet Mall Minneapolis MN, 55402 United States	Electronic Service		No	M-25-50
22	Jenny	Glumack	jenny@mrea.org	Minnesota Rural Electric Association		11640 73rd Ave N Maple Grove MN, 55369 United States	Electronic Service		No	M-25-50
23	Jason	Grenier	jgrenier@otpc.com	Otter Tail Pow er Company		215 South Cascade Street Fergus Falls MN, 56537 United States	Electronic Service		No	M-25-50
24	Jeffrey	Haase	jhaase@grenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove	Electronic Service		No	M-25-50

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						MN, 55369 United States				
25	Adam	Heinen	aheinen@dakotaelectric.com	Dakota Electric Association		4300 220th St W Farmington MN, 55024 United States	Electronic Service		No	M-25-50
26	Joe	Hoffman	ja.hoffman@smmpa.org	SMMPA		500 First Ave SW Rochester MN, 55902-3303 United States	Electronic Service		No	M-25-50
27	Michael	Hoppe	lu23@ibew 23.org	Local Union 23, I.B.E.W.		445 Etna Street Ste. 61 St. Paul MN, 55106 United States	Electronic Service		No	M-25-50
28	Alan	Jenkins	aj@jenkinsatlaw.com	Jenkins at Law		2950 Yellow tail Ave. Marathon FL, 33050 United States	Electronic Service		No	M-25-50
29	Dave	Johnson	dave.johnson@aeoa.org	Arrow head Economic Opportunity Agency		702 3rd Ave S Virginia MN, 55792 United States	Electronic Service		No	M-25-50
30	Richard	Johnson	rick.johnson@law moss.com	Moss & Barnett		150 S. 5th Street Suite 1200 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-50
31	Sarah	Johnson Phillips	sjphillips@stoel.com	Stoel Rives LLP		33 South Sixth Street Suite 4200 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-50
32	Martin	Kapsch	martin.kapsch@centerpointenergy.com	CenterPoint Energy Minnesota Gas		505 Nicollet Mall Minneapolis MN, 55402 United States	Electronic Service		No	M-25-50
33	Deborah	Knoll	dknoll@mnpower.com	Minnesota Power		30 W Superior St Duluth MN, 55802 United States	Electronic Service		No	M-25-50
34	Kathryn	Knudson	kathryn.knudson@centerpointenergy.com	CenterPoint Energy Minnesota Gas		null null, null United States	Electronic Service		No	M-25-50
35	Tina	Koecher	tkoecher@mnpower.com	Minnesota Power		30 W Superior St Duluth MN, 55802-2093 United States	Electronic Service		No	M-25-50
36	Peder	Larson	plarson@larkinhoffman.com	Larkin Hoffman Daly		8300 Norman Center Drive Suite 1000	Electronic Service		No	M-25-50

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
48	Samantha	Norris	samanthanorris@alliantenergy.com	Interstate Power and Light Company		200 1st Street SE PO Box 351 Cedar Rapids IA, 52406-0351 United States	Electronic Service		No	M-25-50
49	Carol A.	Overland	overland@legalelectric.org	Legalelectric - Overland Law Office		1110 West Avenue Red Wing MN, 55066 United States	Electronic Service		No	M-25-50
50	Lisa	Pickard	lseverson@minnkota.com	Minnkota Power Cooperative		5301 32nd Ave S Grand Forks ND, 58201 United States	Electronic Service		No	M-25-50
51	Bill	Poppert	info@technologycos.com	Technology North		2433 Highway Ave St. Paul MN, 55119 United States	Electronic Service		No	M-25-50
52	Dave	Reinke	dreinke@dakotaelectric.com	Dakota Electric Association		4300 220th St W Farmington MN, 55024-9583 United States	Electronic Service		No	M-25-50
53	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-25-50
54	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-25-50
55	Jean	Schafer	jeans@bepc.com	Basin Electric Power Cooperative		1717 E Interstate Ave Bismarck ND, 58501 United States	Electronic Service		No	M-25-50
56	Rick	Sisk	rsisk@trccompanies.com	Lockheed Martin		1000 Clark Ave. St. Louis MO, 63102 United States	Electronic Service		No	M-25-50
57	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-25-50
58	Anna	Sommer	asommer@energyfuturesgroup.com	Energy Futures Group		PO Box 692 Canton NY, 13617 United States	Electronic Service		No	M-25-50
59	Russ	Stark	russ.stark@ci.stpaul.mn.us	City of St. Paul		Mayor's Office 15 W. Kellogg	Electronic Service		No	M-25-50

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						Blvd., Suite 390 Saint Paul MN, 55102 United States				
60	Byron E.	Starns	byron.starns@stinson.com	STINSON LLP		50 S 6th St Ste 2600 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-50
61	Lauren	Steinhaeuser	lauren.steinhaeuser@xcelenergy.com	Northern States Power Company dba Xcel Energy		414 Nicollet Mall, 401-08 Minneapolis MN, 55401 United States	Electronic Service		No	M-25-50
62	Kodi	Verhalen	kverhalen@taftlaw.com	Taft Stettinius & Hollister LLP		80 S 8th St Ste 2200 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-50
63	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-25-50
64	Michael	Volker	mvolker@eastriver.coop	East River Electric Power Coop		211 S. Harth Ave Madison SD, 57042 United States	Electronic Service		No	M-25-50
65	Ethan	Warner	ethan.warner@centerpointenergy.com	CenterPoint Energy		505 Nicollet Mall Minneapolis MN, 55402 United States	Electronic Service		No	M-25-50
66	Joseph	Windler	jwindler@winthrop.com	Winthrop & Weinstine		225 South Sixth Street, Suite 3500 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-50
67	Robyn	Woeste	robynwoeste@alliantenergy.com	Interstate Power and Light Company		200 First St SE Cedar Rapids IA, 52401 United States	Electronic Service		No	M-25-50
68	Kurt	Zimmerman	kurt.zimmerman@ibew160.org	Local Union #160, IBEW		2909 Anthony Ln St Anthony Village MN, 55418-3238 United States	Electronic Service		No	M-25-50
69	Patrick	Zomer	pat.zomer@lawmoss.com	Moss & Barnett PA		150 S 5th St #1200 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-50