



414 Nicollet Mall
Minneapolis, MN 55401

December 15, 2023

—Via Electronic Filing—

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

RE: REPLY COMMENTS
PROPOSED LOW INCOME, LOW USAGE PROGRAM
DOCKET NOS. E002/GR-21-630 AND E002/M-23-476

Dear Mr. Seuffert:

Northern States Power Company, doing business as Xcel Energy, submits these Reply Comments in response to December 11, 2023 Comments in the above-referenced dockets regarding our October 17, 2023 Low Income, Low Usage Program compliance filing.

We have electronically filed this document with the Minnesota Public Utilities Commission, and copies have been served on the parties on the attached service list. Please contact Pamela Gibbs at 612-330-2889 or pamelak.gibbs@xcelenergy.com or contact me at 612-337-2096 or bridget.dockter@xcelenergy.com if you have any questions regarding this filing.

Sincerely,

/s/

BRIDGET N. DOCKTER
MANAGER, POLICY AND OUTREACH

Enclosure
cc: Service Lists

STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION

Katie J. Sieben	Chair
Valerie Means	Commissioner
Matthew Schuerger	Commissioner
Joseph K. Sullivan	Commissioner
John A. Tuma	Commissioner

IN THE MATTER OF NORTHERN STATES
POWER COMPANY PETITION FOR
APPROVAL OF A PROPOSED LOW
INCOME, LOW USAGE PROGRAM

DOCKET NOS. E002/GR-21-630
E002/M-23-476

REPLY COMMENTS

INTRODUCTION

Northern States Power Company, doing business as Xcel Energy, submits these Reply Comments in response to December 11, 2023 Comments in the above-referenced dockets regarding our October 17, 2023 Low Income, Low Usage Program compliance filing.

Comments were filed by the Minnesota Department of Commerce, Division of Energy Resources (Department) and Energy CENTS Coalition (ECC). We appreciate parties' review of our compliance filing. In this Reply, we respond to parties' comments and provide the additional information requested by the Department.

COMMENTS

I. RESPONSES TO COMMENTS

On July 17, 2023, the Commission approved the Low Income, Low Usage (LILU or Program) discount program, and Order Points 63 and 64 require the Company to: 1) implement the LILU Program as proposed by ECC; and 2) make the Program available to customers on the later of the effective date of final rates or October 1, 2023. The Company is required to file a Program status update on December 1, 2023, and annually thereafter with its Electric Low Income Discount filing. We appreciate the support of both the Department and ECC, recommending approval of our Low Income, Low Use compliance report and associated tariffs and are excited about the

opportunity to provide this customer group a resource for a discount on their electric utility bills.

A. Does the LILU Meet the Requirements of Minn. Stat. § 216B.16 Subd. 15 for Low-Income Affordability Programs?

The Department requested the Company address our LILU Program as it relates to Minn. Statute, Section 216B.16, subd. 15(b) as *Noticed* in Comments. Subd. 15 of this Statute requires a utility's low-income affordability program to: 1) lower the percentage of income that participating low-income households devote to energy bills; 2) increase participating customer payments over time by increasing the frequency of payments; 3) decrease or eliminate participating customer arrears; 4) lower the utility costs associated with customer account collection activities; and 5) coordinate the program with other available low-income bill payment assistance and conservation resources.

When responding to this question, it is important to consider both the entire Minn. Statute 216B.16, subd. 15, as well as note that the Commission approved the LILU Program as a discount to low-income customers' bills in the rate case, as proposed by ECC. The LILU Program ECC designed is for those who use less energy than our typical Affordability Program participants.

In the statute, eligibility for affordability programs is limited to Low Income Home Energy Assistance Program (LIHEAP) recipients. The LILU is designed to assist low-income customers well beyond LIHEAP. Since LILU is not a program for LIHEAP customers but for low-income customers generally (and LIHEAP is one way to determine eligibility), it should not fall under the statute. Further, Subd. 15(a) states the commission must consider ability to pay as a factor in setting utility rates, which is what they did in approving the LILU Program.

Subd. 15. Low-income affordability programs.

(a) The commission must consider ability to pay as a factor in setting utility rates and may establish affordability programs for low-income residential ratepayers in order to ensure affordable, reliable, and continuous service to low-income utility customers.

To provide a usage example, the average monthly kWh for our PowerON participants in the 2023 Program year is 774¹, more than twice the LILU Program's qualifying usage criteria. Most of the customers that qualify for the discount offered in the LILU

¹ 2023 Annual Report, Electric Low Income Energy Discount Program filed December 1, 2023, in Docket Nos. E002/M-04-1956, E002/M-10-854, and E002/23-476.

Program would not qualify for a high energy burden assistance program by nature of their low usage, even though their utility costs are impactful on a low-income budget. As one of the region's strongest affordability advocates, ECC sought to provide support for this underserved customer group because we did not have a program to offer assistance and it has seen positive results in the LILU they designed for Minnesota Power. An excerpt from ECC's comments providing rationale is below.

ECC proposed to mitigate electric rate increases for low-income Xcel customers who *do not* benefit from the programs under §Minn. Stats. 216B.16 Subd. 15 and 16. Those statutorily mandated programs purposefully provide relief to those low-income residential customers with the *highest* energy consumption levels and lowest incomes (energy burden).

Because the LILU is designed to provide financial relief to low-income Xcel customers with monthly electric usage below 300 kWh per month, the vast majority of the Company's lowest usage, low-income customers would not even be eligible under the provisions of these statutes.^[2]

In other words, ECC did not propose, and the Commission did not approve, an additional affordability program based on, or to comply with, existing statutes. Instead, the Commission approved a discount for those who were least likely to qualify for, or benefit from, existing affordability programs or energy-efficiency programs—precisely *because* their usage was too low. Similarly, the Commission approved Minnesota Power's low-income, low-usage rate discount,^[3] upon which Xcel's proposed LILU is modeled.^[4] The Commission's approval of Minnesota Power's low-income, low-usage discount was not predicated on adherence to, or compliance with, the low-income electric affordability program statute.

ECC does not believe that Xcel Energy's proposed LILU was designed to, or needs to meet, the requirements of §Minn. Stat. 216B.16 Subd.15

^[1] §Minn. Stat. 216B.16 Subd. 15 or Subd. 16.

^[2] §Minn. Stats. 216B.16 Subd. 14 states Xcel Energy's electric affordability programs "must be targeted to customers with the lowest incomes and *highest* energy costs (emphasis added)."

^[3] Findings of Fact, Conclusions, and Order, In the Matter of the Application of Minnesota Power for Authority to Increase Rates for Electric Service in Minnesota, Docket No. E-015/GR-21-335, February 28, 2023.

Order Approving Transition from Inverted Block Rate to Time-of-Day Rates, In the Matter of the Petition for Approval of Minnesota Power's Residential Rate Design and In the Matter of Minnesota Power's Compliance Report for its Temporary Rider for Residential Time-of-Day Rate for Participants of the Smart Grid Advance Metering Infrastructure Pilot Project, Docket No. E015/M-20-850/Docket No. E015/M-12-233, August 27, 2021.

¹⁴ Fair, Direct Testimony, Docket Number E-002/GR-21-630.

The Company agrees with ECC's assessment and requests the Commission find our LILU Program does not need to meet the provisions of Minn. Statute § 216B.16, subd. 15(b) that requires an Affordability Program:

- 1) Lower the percentage of income that participating low-income households devote to energy bills;
- 2) Increase participating customer payments over time by increasing the frequency of payments;
- 3) Decrease or eliminate participating customer arrears;
- 4) Lower the utility costs associated with customer account collection activities; and
- 5) Coordinate the program with other available low-income bill payment assistance and conservation resources.

However, in direct response to the Department's request to address the five provisions listed above, we offer the following:

Any discount provided through the LILU Program will lower the percentage of income participating households use to pay their electricity bills, allowing for a stronger ability to pay bills timely, reducing accumulating utility arrears. Increasing payment frequency and decreasing arrears reduces utility account collection costs. The LILU Program may be coordinated with the Monthly Discount Program that offers seniors or disabled LIHEAP qualified customers a \$15.00 discount on their monthly bill.

B. Is the Proposed Reporting Adequate to Obtain an Understanding of the Program?

In compliance with the July 17, 2023, rate case Order, our first Annual Report compliance was included in our Low-Income Discount Annual Report submitted December 1, 2023. In that report, we expanded on the LILU framework and

implementation details and again listed our proposed reporting.² The LILU Program reporting we first proposed in our October 17, 2023, compliance filing is consistent with the other programs in our Low-Income Electric Affordability portfolio. We acknowledge that reporting elements may change over time as the LILU Program evolves.

The Company proposes to provide the following LILU Program updates in each Low-Income Discount Annual Report:

- A narrative update on the LILU Program;
- A cumulative five-year outlook showing program year participation (as it progresses);
- The average annual discount;
- Total program disbursements;
- Total administrative costs;
- Customer enrollment breakdown through LIHEAP (Low-Income Home Energy Assistance Program) and self-declaration;
- LILU Program participant disconnections;
- Monthly class surcharges;
- A program tracker; and
- A status summary sheet provided as an attachment.

Both the Department and ECC expressed support for our proposed reporting in their Comments filed on December 11, 2023.

CONCLUSION

We appreciate the opportunity to respond to parties Comments and respectfully request the Commission approve our Low-Income Low Usage Compliance filing and proposed tariff's.

Dated: December 15, 2023

Northern States Power Company

² Filed under Docket Nos. E002/M-04-1956, E002/M-10-854, and E002/M-23-476.

CERTIFICATE OF SERVICE

I, Christine Schwartz, hereby certify that I have this day served copies of the foregoing document on the attached list of persons.

xx by depositing a true and correct copy thereof, properly enveloped with postage paid in the United States mail at Minneapolis, Minnesota

xx electronic filing

DOCKET NOS. E002/GR-21-630
E002/M-23-476

Dated this 15th day of December 2023

/s/

Christine Schwartz
Regulatory Administrator

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Kevin	Adams	kadams@caprw.org	Community Action Partnership of Ramsey & Washington Counties	450 Syndicate St N Ste 35 Saint Paul, MN 55104	Electronic Service	No	OFF_SL_21-630_Official
Mara	Ascheman	mara.k.ascheman@xcelenergy.com	Xcel Energy	414 Nicollet Mall Fl 5 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_21-630_Official
Gail	Baranko	gail.baranko@xcelenergy.com	Xcel Energy	414 Nicollet Mall 7th Floor Minneapolis, MN 55401	Electronic Service	No	OFF_SL_21-630_Official
Allen	Barr	allen.barr@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota St Ste 1400 Saint Paul, MN 55101	Electronic Service	No	OFF_SL_21-630_Official
Jessica L	Bayles	Jessica.Bayles@stoel.com	Stoel Rives LLP	1150 18th St NW Ste 325 Washington, DC 20036	Electronic Service	No	OFF_SL_21-630_Official
James J.	Bertrand	james.bertrand@stinson.com	STINSON LLP	50 S 6th St Ste 2600 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-630_Official
Elizabeth	Brama	ebrama@taftlaw.com	Taft Stettinius & Hollister LLP	2200 IDS Center 80 South 8th Street Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-630_Official
James	Canaday	james.canaday@ag.state.mn.us	Office of the Attorney General-RUD	Suite 1400 445 Minnesota St. St. Paul, MN 55101	Electronic Service	No	OFF_SL_21-630_Official
John	Coffman	john@johncoffman.net	AARP	871 Tuxedo Blvd. St, Louis, MO 63119-2044	Electronic Service	No	OFF_SL_21-630_Official
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-630_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
George	Crocker	gwillc@nawo.org	North American Water Office	5093 Keats Avenue Lake Elmo, MN 55042	Electronic Service	No	OFF_SL_21-630_Official
James	Denniston	james.r.denniston@xcelenergy.com	Xcel Energy Services, Inc.	414 Nicollet Mall, 401-8 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_21-630_Official
Ian M.	Dobson	ian.m.dobson@xcelenergy.com	Xcel Energy	414 Nicollet Mall, 401-8 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_21-630_Official
Richard	Dornfeld	Richard.Dornfeld@ag.state.mn.us	Office of the Attorney General-DOC	Minnesota Attorney General's Office 445 Minnesota Street, Suite 1800 Saint Paul, MN 55101	Electronic Service	No	OFF_SL_21-630_Official
Brian	Edstrom	briane@cubminnesota.org	Citizens Utility Board of Minnesota	332 Minnesota St Ste W1360 Saint Paul, MN 55101	Electronic Service	No	OFF_SL_21-630_Official
Rebecca	Eilers	rebecca.d.eilers@xcelenergy.com	Xcel Energy	414 Nicollet Mall - 401 7th Floor Minneapolis, MN 55401	Electronic Service	No	OFF_SL_21-630_Official
John	Farrell	jfarrell@ilsr.org	Institute for Local Self-Reliance	2720 E. 22nd St Institute for Local Self-Reliance Minneapolis, MN 55406	Electronic Service	No	OFF_SL_21-630_Official
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 551012198	Electronic Service	No	OFF_SL_21-630_Official
Lucas	Franco	lfranco@liunagroc.com	LIUNA	81 Little Canada Rd E Little Canada, MN 55117	Electronic Service	No	OFF_SL_21-630_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Edward	Garvey	garveyed@aol.com	Residence	32 Lawton St Saint Paul, MN 55102	Electronic Service	No	OFF_SL_21-630_Official
Edward	Garvey	edward.garvey@AESLconsulting.com	AESL Consulting	32 Lawton St Saint Paul, MN 55102-2617	Electronic Service	No	OFF_SL_21-630_Official
Shubha	Harris	Shubha.M.Harris@xcelenergy.com	Xcel Energy	414 Nicollet Mall, 401 - FL 8 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_21-630_Official
Matthew B	Harris	matt.b.harris@xcelenergy.com	XCEL ENERGY	401 Nicollet Mall FL 8 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_21-630_Official
Amber	Hedlund	amber.r.hedlund@xcelenergy.com	Northern States Power Company dba Xcel Energy-Elec	414 Nicollet Mall, 401-7 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_21-630_Official
Adam	Heinen	aheinen@dakotaelectric.com	Dakota Electric Association	4300 220th St W Farmington, MN 55024	Electronic Service	No	OFF_SL_21-630_Official
Katherine	Hinderlie	katherine.hinderlie@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota St Suite 1400 St. Paul, MN 55101-2134	Electronic Service	No	OFF_SL_21-630_Official
Michael	Hoppe	lu23@ibew23.org	Local Union 23, I.B.E.W.	445 Etna Street Ste. 61 St. Paul, MN 55106	Electronic Service	No	OFF_SL_21-630_Official
Geoffrey	Inge	ginge@regintl.com	Regulatory Intelligence LLC	PO Box 270636 Superior, CO 80027-9998	Electronic Service	No	OFF_SL_21-630_Official
Alan	Jenkins	aj@jenkinsatlaw.com	Jenkins at Law	2950 Yellowtail Ave. Marathon, FL 33050	Electronic Service	No	OFF_SL_21-630_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Richard	Johnson	Rick.Johnson@lawmoss.com	Moss & Barnett	150 S. 5th Street Suite 1200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-630_Official
Sarah	Johnson Phillips	sarah.phillips@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-630_Official
Brad	Klein	bklein@elpc.org	Environmental Law & Policy Center	35 E. Wacker Drive, Suite 1600 Suite 1600 Chicago, IL 60601	Electronic Service	No	OFF_SL_21-630_Official
Michael	Krikava	mkrikava@taftlaw.com	Taft Stettinius & Hollister LLP	2200 IDS Center 80 S 8th St Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-630_Official
Carmel	Laney	carmel.laney@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-630_Official
Peder	Larson	plarson@larkinhoffman.com	Larkin Hoffman Daly & Lindgren, Ltd.	8300 Norman Center Drive Suite 1000 Bloomington, MN 55437	Electronic Service	No	OFF_SL_21-630_Official
Annie	Levenson Falk	annief@cupminnesota.org	Citizens Utility Board of Minnesota	332 Minnesota Street, Suite W1360 St. Paul, MN 55101	Electronic Service	No	OFF_SL_21-630_Official
Ryan	Long	ryan.j.long@xcelenergy.com	Xcel Energy	414 Nicollet Mall 401 8th Floor Minneapolis, MN 55401	Electronic Service	No	OFF_SL_21-630_Official
Alice	Madden	alice@communitypowermn.org	Community Power	2720 E 22nd St Minneapolis, MN 55406	Electronic Service	No	OFF_SL_21-630_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Kavita	Maini	kmaini@wi.rr.com	KM Energy Consulting, LLC	961 N Lost Woods Rd Oconomowoc, WI 53066	Electronic Service	No	OFF_SL_21-630_Official
Pam	Marshall	pam@energycents.org	Energy CENTS Coalition	823 E 7th St St Paul, MN 55106	Electronic Service	No	OFF_SL_21-630_Official
Mary	Martinka	mary.a.martinka@xcelenergy.com	Xcel Energy Inc	414 Nicollet Mall 7th Floor Minneapolis, MN 55401	Electronic Service	No	OFF_SL_21-630_Official
Erica	McConnell	emcconnell@elpc.org	Environmental Law & Policy Center	35 E. Wacker Drive, Suite 1600 Chicago, IL 60601	Electronic Service	No	OFF_SL_21-630_Official
Joseph	Meyer	joseph.meyer@ag.state.mn.us	Office of the Attorney General-RUD	Bremer Tower, Suite 1400 445 Minnesota Street St Paul, MN 55101-2131	Electronic Service	No	OFF_SL_21-630_Official
Stacy	Miller	stacy.miller@minneapolismn.gov	City of Minneapolis	350 S. 5th Street Room M 301 Minneapolis, MN 55415	Electronic Service	No	OFF_SL_21-630_Official
David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022093	Electronic Service	No	OFF_SL_21-630_Official
Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP	33 South Sixth St Ste 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-630_Official
Christa	Moseng	christa.moseng@state.mn.us	Office of Administrative Hearings	P.O. Box 64620 Saint Paul, MN 55164-0620	Electronic Service	No	OFF_SL_21-630_Official
David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency	220 South Sixth Street Suite 1300 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-630_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Carol A.	Overland	overland@legalelectric.org	Legalelectric - Overland Law Office	1110 West Avenue Red Wing, MN 55066	Electronic Service	No	OFF_SL_21-630_Official
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_21-630_Official
Kevin	Reuther	kreuther@mncenter.org	MN Center for Environmental Advocacy	26 E Exchange St, Ste 206 St. Paul, MN 551011667	Electronic Service	No	OFF_SL_21-630_Official
Amanda	Rome	amanda.rome@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 5 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_21-630_Official
Joseph L	Sathe	jsathe@kennedy-graven.com	Kennedy & Graven, Chartered	150 S 5th St Ste 700 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-630_Official
Elizabeth	Schmiesing	eschmiesing@winthrop.com	Winthrop & Weinstine, P.A.	225 South Sixth Street Suite 3500 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-630_Official
Peter	Scholtz	peter.scholtz@ag.state.mn.us	Office of the Attorney General-RUD	Suite 1400 445 Minnesota Street St. Paul, MN 55101-2131	Electronic Service	No	OFF_SL_21-630_Official
Christine	Schwartz	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_21-630_Official
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th PI E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-630_Official
Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates	7400 Lyndale Ave S Ste 190 Richfield, MN 55423	Electronic Service	No	OFF_SL_21-630_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.	76 W Kellogg Blvd St. Paul, MN 55102	Electronic Service	No	OFF_SL_21-630_Official
Joshua	Smith	joshua.smith@sierraclub.org		85 Second St FL 2 San Francisco, CA 94105	Electronic Service	No	OFF_SL_21-630_Official
Beth H.	Soholt	bsoholt@windonthewires.org	Wind on the Wires	570 Asbury Street Suite 201 St. Paul, MN 55104	Paper Service	No	OFF_SL_21-630_Official
Byron E.	Starns	byron.starns@stinson.com	STINSON LLP	50 S 6th St Ste 2600 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-630_Official
Scott	Strand	SStrand@elpc.org	Environmental Law & Policy Center	60 S 6th Street Suite 2800 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-630_Official
James M	Strommen	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered	150 S 5th St Ste 700 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-630_Official
Eric	Swanson	eswanson@winthrop.com	Winthrop & Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_21-630_Official
Joseph	Windler	jwindler@winthrop.com	Winthrop & Weinstine	225 South Sixth Street, Suite 3500 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-630_Official
Kurt	Zimmerman	kwz@ibew160.org	Local Union #160, IBEW	2909 Anthony Ln St Anthony Village, MN 55418-3238	Electronic Service	No	OFF_SL_21-630_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Patrick	Zomer	Pat.Zomer@lawmoss.com	Moss & Barnett PA	150 S 5th St #1200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-630_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_23-476_M-23-476
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 551012198	Electronic Service	No	OFF_SL_23-476_M-23-476
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_23-476_M-23-476
Christine	Schwartz	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_23-476_M-23-476
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th PI E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_23-476_M-23-476