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May 11, 2026

—Via Electronic Filing—

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

RE: REPLY COMMENTS
IN THE MATTER OF A COMMISSION INVESTIGATION ON GRID AND CUSTOMER
SECURITY ISSUES RELATED TO PUBLIC DISPLAY OR ACCESS TO ELECTRIC
DISTRIBUTION GRID DATA
DOCKET NO. E999/CI-20-800

Dear Ms. Bergman:

Northern States Power Company, doing business as Xcel Energy, submits the enclosed Reply Comments to the Minnesota Public Utilities Commission in response to its March 31, 2026 Notice of Comment Period in the above-referenced docket.

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 Nathan Kostiuk at nathan.c.kostiuk@xcelenergy.com or contact me at jody.l.londo@xcelenergy.com if you have any questions regarding this filing.

Sincerely,

/s/

JODY LONDO
DIRECTOR, REGULATORY AND STRATEGIC ANALYSIS

Enclosure
cc: Service List

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BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION

Katie J. Sieben	Chair
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Audrey C. Partridge	Commissioner
Joseph K. Sullivan	Commissioner
John A. Tuma	Commissioner

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CUSTOMER SECURITY ISSUES RELATED
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REPLY COMMENTS

INTRODUCTION

Northern States Power Company, doing business as Xcel Energy (Xcel Energy or Company), submits these Reply Comments to the Minnesota Public Utilities Commission (Commission) pursuant to its March 31, 2026 Notice of Comment Period in the above-referenced docket. Specifically, the Company responds to the Comments submitted by the Minnesota Department of Commerce, Joint Parties (Minnesota Solar Energy Industries Association, US Solar), Coalition for Community Solar Access, Dakota Electric Association, and Minnesota Power (collectively, the Parties).

Initial Comments demonstrate broad agreement that the statewide grid data sharing framework (Framework) outlined in the Converge Strategies' *Recommendations for a Grid Data Sharing Framework* report (Report) is a helpful guide for developing a process to share non-public distribution grid data in a risk-informed and balanced way. The Company believes the Framework is a positive step forward for balancing risks of grid security with information that can help facilitate additional distributed energy resources (DER). That said, the Comments demonstrate that modifications to the Framework are necessary before the Commission adopts the Report.

Critical modifications include: (1) acknowledging utilities' ability to recover the costs of implementing and administering the final Framework, (2) defining what data requests are permissible, (3) rejecting the Grid Security Working Group (GSWG) as a dispute resolution venue in its current form, (4) clarifying that background checks are

required as part of the preapplication phase, and (5) articulating that timelines for processing requests are a target.

We also respond to comments that argue: (1) the record lacks a specific example where grid data created a security risk, (2) Colorado's grid data sharing framework should apply in Minnesota, and (3) there should be a 30-day negative check off after each annual compliance report.

We respectfully request the Commission modify the Report before issuing orders as discussed below.

REPLY COMMENTS

Our Reply Comments address a number of topics discussed in Parties' Initial Comments, specifically where modifications are needed before the Commission accepts the Report or implements the Framework, and areas of disagreement with other Parties' arguments.

I. MODIFICATIONS TO THE REPORT ARE NECESSARY

The Report is not complete as drafted, as it does not adequately address a number of critical issues. We believe the following areas require additional information and record development before the Commission accepts the Report or implements the Framework.

A. Cost Recovery Must Be Addressed

Like Dakota Electric Association¹ and as raised in our Initial Comments, we are concerned that the Report does not discuss cost recovery associated with implementing the Framework as presented in the Report. It is essential that the Commission explicitly acknowledge that all costs associated with grid data sharing are eligible for cost recovery. Establishing a secure portal will require capital investment, and processing and responding to data requests will require staff labor and usage of the software tools established, all of which carry a cost. We believe software development costs associated with implementation of this Framework should be recoverable from all customers, and costs related to program administration should be recovered through participant fees, consistent with the cost causation principle.

¹ Dakota Electric Association's Initial Comments in *In the Matter of a Commission Investigation on Grid and Customer Security Issues Related to Public Display or Access to Electric Distribution Grid Data*, Docket No. E999/CI-20-800 (April 30, 2026) at p8-9.

B. Permissible Data Requests Must Be Identified and Documented Before Implementation Begins

As we discuss in our Initial Comments, there needs to be further record development on which specific data can be requested, based on legitimate uses pertaining to siting DER.² The Report does not articulate what data sets requestors have a valid need to know in order to site DER that is not publicly shared, especially in light of the extensive information that is already provided.³ This is a critical gap; the Report must address this fundamental element of a data sharing framework. Addressing this open issue will inform how the Framework is applied, as it will establish a clear subset of what data is eligible for implementation. For example, we do not oppose the recommendation by Joint Parties to uniformly associate a risk level with data categories.⁴ But those data categories should be clearly defined before implementation, and based off of a “minimum data needed” principle, as discussed in the workgroups. Furthermore, as discussed in the third workgroup meeting that tested the Framework against specific use cases, the overall risk level of a request may be determined by factors beyond just the risk level of the data being requested.⁵ For example, the risk level of the entity making the request or the proposed usage of the data should also be considered when determining overall risk level.

C. The Grid Security Working Group in its Current Form Should Not Be Used as a Dispute Resolution Venue

Many Parties highlighted concerns with the role the GSWG would play in dispute resolution. The Report suggests that the GSWG should be used as an informal dispute resolution mechanism.⁶ But Minnesota Power recommends the Commission reject the proposal to use the GSWG as a dispute resolution mechanism altogether.⁷ As we discuss in our Initial Comments, we support the Commission adopting an

² Xcel Energy’s Initial Comments *In the Matter of a Commission Investigation on Grid and Customer Security Issues Related to Public Display or Access to Electric Distribution Grid Data*, Docket No. E999/CI-20-800, (April 30, 2026) at p11-13.

³ See <https://mn.my.xcelenergy.com/s/renewable/developers/interconnection>.

⁴ Joint Parties’ Initial Comments in *In the Matter of a Commission Investigation on Grid and Customer Security Issues Related to Public Display or Access to Electric Distribution Grid Data*, Docket No. E999/CI-20-800 (April 30, 2026) at p11.

⁵ *In the Matter of a Commission Investigation on Grid and Customer Security Issues Related to Public Display or Access to Electric Distribution Grid Data*, Docket No. E999/CI-20-800, REPORT (March 4, 2026) at Attachment C, p81.

⁶ *Ibid* at p18.

⁷ Minnesota Power’s Initial Comments in *In the Matter of a Commission Investigation on Grid and Customer Security Issues Related to Public Display or Access to Electric Distribution Grid Data*, Docket No. E999/CI-20-800 (April 30, 2026) at p4.

informal dispute resolution process. But the GSWG does not currently have the appropriate membership or protocols to serve that role. Also, without further clarification on the dispute resolution process, taking on such a role could put the GSWG into an adjudicatory role, which is far different from the current role of seeking consensus. The Report must provide more clarity on who would participate in dispute resolution, how conflicts would be evaluated, what criteria would be applied, how recommendations or determinations would be documented and communicated, and the appeals process to the Commission of any determinations. Absent this discussion, it is likely that disputes may overwhelm the Consumer Affairs Office (CAO). More information and record development is needed on the proposed dispute resolution mechanism before the Framework is implemented.

D. Background Checks Must Be Conducted in the Preapplication Phase

The Joint Parties recommend that background checks occur after the utility conducts a risk analysis, and suggest that universal background checks may not be necessary.⁸ This argument is troubling. The data in consideration in this docket is, by definition, sensitive, non-public data. Low risk data does not refer to publicly available data, in which a background check is indeed unnecessary. But any data that could cause damage or harm to a distribution grid warrants at the very least validating that the requestor is a legitimate entity without known issues that raise red flags. Particularly given risks of data aggregation as described below, we must not view low risk data as no risk data. Furthermore, there may be situations where the requestor does not pass a background check. It would be an imprudent use of Company resources and staff hours to respond to a data request that does not emanate from a verified requestor. The Company's data security protocols are clear: background checks are required when a third party accesses our systems or data. Verifying third parties needs to happen before data is prepared and shared. This is in line with the Framework developed by Converge Strategies, and this should be clearly stated in the Report before the Commission develops an order accepting the Report.

E. Timelines for Processing Grid Data Requests Must Be a Soft Target

The Report establishes a timeline for processing data requests, and identifies specific extenuating circumstances that may delay the response. Specifically, the Report states:

While utilities should make every good-faith effort to resolve requests in an efficient and timely manner, we recognize that some requests may take longer due to their complexity or the need to facilitate engagements with the Commission. Additionally, normal activities (e.g., utility

⁸ Joint Parties Initial Comments at p3, 8-9.

employees taking PTO, medical, or family leave, and natural staff turnover) and fluctuating volumes of requests, could impact the timeline. These circumstances should be clearly communicated to the requester, along with a reasonable estimated time of completion.

Regardless, this suggested timeline is meant to set time-based goals and expectations for utilities when navigating this process. However, if timelines become extended, for reasons that are not—or are not demonstrably not similar to—the ones discussed above (e.g., total unexplained lack of communication at any point during process, inflexibility in scheduling meetings that can be a means to block progress, etc.), then the appeals process discussed in Section 4 should be used by the aggrieved party.⁹

The Company wishes to highlight and offer our support of Minnesota Power’s Initial Comments regarding timelines for processing data requests. Specifically, Minnesota Power appropriately recognizes that although the Framework’s 90-day timeline may be sufficient, it should be a “target,” not a “hard cap.”¹⁰ Timing for processing application receipt and scoping meetings, identifying if the utility possesses the requested information, conducting a risk analysis, and preparing a secure sharing mechanism all take time. Although clarity on timelines makes sense, the Company does not know, and cannot know, if there will be other, numerous requests for data being processed at the very same time. As we present in our Initial Comments, we recommend the Commission articulate a target timeframe for responding to data requests, while expressly allowing utilities additional flexibility to extend that timeframe when warranted.¹¹ The extenuating circumstances listed by Converge Strategies should not be considered exclusive, as the Report suggests. This stands as an important caveat that must be addressed before the Commission implements the Framework.

II. THE COMMISSION SHOULD NOT ACCEPT ASSERTIONS THAT GRID DATA DOES NOT CREATE A SECURITY RISK

The Joint Parties assert that parties have not identified a specific example where grid information created a security risk.¹² This argument incorrectly assumes that the lack of a documented attack on the Minnesota grid indicates the Minnesota grid is not at risk of being attacked. As referenced in our Initial Comments: law enforcement, homeland security, and intelligence agencies have unanimously raised alarms about

⁹ Report at p19.

¹⁰ Minnesota Power Initial Comments at p3.

¹¹ Xcel Energy Initial Comments at p10-11.

¹² Joint Parties Initial Comments at p14.

threats to our electric grid.¹³ Coordinated attacks, informed by detailed grid data, could lead to catastrophic events. We request the Commission consider what a bad actor could do with a specific one-line diagram showing the feeders that power the State Capitol, the Governor's Residence, or US Bank Stadium, to name just a few obvious examples of priority customers. Waiting for an attack to happen to prove the risk of attack would be a complete failure to ensure the safety and reliability of the grid. It is not only possible, but likely, that bad actors could be infiltrating energy infrastructure now to pre-position an attack in the future. Furthermore, utilities talk about threats to their grid in general terms because they are prohibited from discussing sensitive, classified, specific intelligence in public domains.

The rapid advancement of artificial intelligence (AI) further compounds the risk of attack on grid infrastructure. Current AI capabilities significantly lower the skill barrier to identify critical locations, single points of failure, and optimal attack sequences. The Department of Energy has warned that AI can be used to "enhance attempts to attack our critical energy infrastructure,"¹⁴ and Google's Threat Intelligence Group confirmed in 2026 that nation states are already using large language models to accelerate reconnaissance.¹⁵ Research from the Model Evaluation and Threat Research organization (METR) demonstrates that AI task-completion capabilities have doubled approximately every seven months over the past six years, a pace of exponential growth that shows no signs of slowing.¹⁶ For perspective, this means that AI capabilities may have doubled from the time of the March 2026 Commission Notice to the time of the Commission hearing on the issues in its Notice. All of these uses of AI would inform attacks if bad actors had access to additional grid information that is non-public. Consideration should be made for the security implications of grid data disclosure not against yesterday's threat landscape, but where AI has fundamentally lowered the cost, skill, and time required to convert data into an actionable attack plan.

In January 2026, Dragos documented a real-world example of an adversary leveraging commercial AI to identify and target the operational technology (OT, the software and hardware that monitors and controls physical devices, including grid equipment) of critical infrastructure.¹⁷ During an intrusion into a municipal water utility in

¹³ Xcel Energy Initial Comments at p14.

¹⁴ See https://www.energy.gov/sites/default/files/2024-04/DOE%20CESER_EO14110-AI%20Report%20Summary_4-26-24.pdf.

¹⁵ See <https://cloud.google.com/blog/topics/threat-intelligence/distillation-experimentation-integration-ai-adversarial-use>.

¹⁶ <https://metr.org/blog/2025-03-19-measuring-ai-ability-to-complete-long-tasks/>.

¹⁷ See https://www.dragos.com/blog/ai-assisted-ics-attack-water-utility?utm_campaign=Brand+%7C+Q22022&utm_medium=ppc&utm_source=adwords&utm_content=&utm_ad_id=&utm_campaign_id=.

Monterrey, Mexico, attackers used Anthropic's Claude AI to conduct reconnaissance, rapidly build an exploitation framework, and independently identify a Supervisory Control and Data Acquisition (SCADA) gateway as a high value critical infrastructure target. Dragos concluded that AI-assisted operations compressed what would normally require days or weeks of development into hours.

The attacks on Ukraine's largest electric power utility in 2015 and 2016 serve as a harrowing example of how a nation state was able to inflict severe damage on an electric grid based on information they had infiltrated in advance of the attack. In 2015, in mere moments, attackers targeting the Ukrainian distribution grid shut off power to over 225,000 customers, and in 2016 power was shut off to one fifth of Kiev.¹⁸ Attackers behind these grid outages demonstrated detailed prior knowledge of the utility's system gathered through extended reconnaissance and data gathering preceding the attack. This intelligence also enabled attackers to time cyber operations to coincide with peak demand periods, geopolitical events, or maintenance windows, increasing the likelihood of operational impact.

In addition, in 2023, Chinese state-sponsored hackers (Volt Typhoon) infiltrated the Littleton Electric Light and Water Departments and maintained persistent access for over 300 days before being detected by the Federal Bureau of Investigation (FBI). Littleton was one of approximately 200 utilities the FBI identified as compromised in the same campaign.¹⁹ Reporting confirmed that the attackers specifically sought to exfiltrate procedures and spatial layout data related to grid operations. As former National Security Agency Director Gen. Tim Haugh stated on *60 Minutes*: "If you are willing to go after a small water provider in Littleton, Massachusetts... that means every target is on the list."²⁰

More recent is the successful cyberattack on Nova Scotia Power in April 2026. After suffering a ransomware attack, in addition to leaking personal data, power meters across their system were targeted and failed, disrupting communication with the utility's system.²¹ This attack demonstrates the impact cyberattacks can have on physical infrastructure, not just corporate IT systems. With detailed data on distribution grids, a criminal, domestic violent extremist, or nation state adversary

¹⁸ See <https://www.dragos.com/blog/2015-ukraine-power-grid-attack-lessons-in-defense>, <https://www.bbc.com/news/technology-38573074>, and <https://www.nrc.gov/docs/ML1819/ML18198A411.pdf>.

¹⁹ See <https://www.boston.com/news/local-news/2025/10/14/60-minutes-spotlights-chinese-hacking-of-massachusetts-towns-utility-network/>.

²⁰ *Ibid.*

²¹ See https://www.cpomagazine.com/cyber-security/cyber-attack-on-canadian-electric-utility-nova-scotia-disconnects-power-meters/#google_vignette.

could orchestrate an attack with maximum impact and damage even more severe than the attacks publicly reported to date.

As an additional example, Pacific Gas & Electric, the largest electric utility in California, experienced a sniper attack on its Metcalf Transmission Substation in 2013. The attack required advanced reconnaissance of available data to identify critical equipment and systems. With knowledge of the layout of the substation, attackers pre-cut fiber-optic communication lines and coordinated rifle fire that destroyed 17 transformers. This attack caused over \$15 million in damage.²² Prior to this attack, the regulatory environment did not adequately account for the risks posed to critical electric grid infrastructure. In response, the incident directly led to the creation of NERC CIP-014,²³ the mandatory physical security standard for critical substations, and California's SB 699.²⁴ These regulatory developments were reactive, after the attack already happened—in many ways, too late.

Across various cases, the consistent pattern is that successful cyber or physical attacks against the energy sector are rarely spontaneous. Instead, they are preceded by methodical intelligence collection focused on understanding infrastructure dependencies, human behavior, and response thresholds. These examples undermine the assertion of some Parties in this proceeding that the absence of an attack in Minnesota means that there is no risk in providing data. Bad actors accumulate their desired information, and attack at their desired time. The absence of an attack in Minnesota does not mean that one is not possible, and should not be used to support an edict that sensitive information should be readily distributed.

These incidents highlight the vulnerabilities faced by critical infrastructure and the importance of information security, grid security, and cybersecurity. Xcel Energy goes to great lengths to avoid these kinds of attacks. Allowing utilities to vet data requestors and protect data helps protect against these threats on the grid. Providing non-public detailed data on the grid presents the very real risk that a coordinated, sophisticated attack could cause significant and severe damage to the Minnesota distribution grid. Knowing now what we do, the Commission has an opportunity in Minnesota to develop a regulatory framework that appropriately recognizes and protects against the sophisticated attacks on the grid highlighted above.

²² See <https://www.wsj.com/articles/SB10001424052702304851104579359141941621778>.

²³ See <https://www.huntress.com/blog/nerc-cip-014-standard-explained>.

²⁴ See <https://www.cpuc.ca.gov/about-cpuc/divisions/safety-policy-division/risk-assessment-and-safety-analytics/physical-security-of-electric-infrastructure>.

III. REFERENCES TO THE GRID DATA SHARING FRAMEWORK USED BY THE COLORADO COMMISSION ARE NOT RELEVANT

The Joint Parties note that in December 2025 the Colorado Public Utilities Commission ordered Xcel Energy's Colorado utility, Public Service Company of Colorado (PSCo), to make generation and load Hosting Capacity Analysis maps publicly available without a non-disclosure agreement (NDA).²⁵ Each state has a unique Commission, empowered to make decisions for their state, not others. Our goal in Minnesota should be to develop a grid data sharing Framework based on best practices, not the most permissive practices. The Framework presented by Converge Strategies is squarely rooted in the NARUC Grid Data Sharing Framework, which stakeholders and the Commission have already agreed provides the appropriate model for identifying how to share grid data securely in Minnesota. Minnesota stakeholders have also broadly agreed that the minimum data needed principle is appropriate to apply to sharing grid data that carries risk upon disclosure. In Colorado, there was not a workgroup process directed by the Commission to identify consensus on distribution grid data sharing practices, nor was the NARUC Grid Data Sharing Framework used as a guide. Absent this due diligence, it does not appear that the Colorado Commission had sufficient record on the risks and necessity for secure data sharing to reference before issuing their Orders. Furthermore, Minnesota has developed a more robust record on the threat to the grid from a range of actors. The Framework presented by Converge Strategies outlines a robust and fair approach to treating non-public grid data securely. The Framework, not another State's unique circumstances, should serve as the foundation for decisions about sharing sensitive grid data in Minnesota.

IV. THE JOINT PARTIES' PROPOSED NEGATIVE CHECK-OFF IS UNWARRANTED

In their Initial Comments, the Joint Parties propose a 30-day negative check-off period following each utility's annual compliance filings on metrics associated with processing grid data requests. The Joint Parties state:

This period would allow interested parties to review these metrics and evaluate the efficacy of the grid data request process. If a party files comments in response to these compliance filings within the 30-day negative check-off period, that will trigger a further period of review. We envision this check-off period as being additive to the evaluation at the three year mark proposed in the Converge report: if no parties file objections or further motions in response to compliance filings, there will still be a full Commission review of the Draft Framework and

²⁵ Joint Parties Initial Comments at p13.

its efficacy at the three year mark. However, if need be, additional review can and will be triggered earlier, to maximize the effectiveness of the process.²⁶

The Framework establishes a three-year period before parties evaluate whether and how the Framework should be altered. We believe this time is needed to fully implement the Framework and assess how data requests are processed. A 30-day negative check off that could alter the Framework on an annual basis with limited time for consideration is not warranted or prudent.

CONCLUSION

Xcel Energy appreciates the opportunity to provide these Reply Comments. We must balance our commitment to advancing the clean energy transition with ensuring a safe, secure, and reliable grid. Due to the serious national security and grid security implications associated with the public release or display of distribution system data and information, we believe certain sections of the Report must be modified before the Commission accepts the Report or implements the Framework.

Dated: May 11, 2026

Northern States Power Company

²⁶ *Ibid* at p22.

CERTIFICATE OF SERVICE

I, Victor Barreiro, 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 No. E999/CI-20-800

Dated this 11th day of May 2026

/s/

Victor Barreiro
Regulatory Administrator

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44	Kavita	Maini	kmaini@wi.rr.com	KM Energy Consulting, LLC		961 N Lost Woods Rd Oconomowoc WI, 53066 United States	Electronic Service		No	20-800 Official
45	Christine	Marquis	regulatory.records@xcelenergy.com	Xcel Energy		414 Nicollet Mall MN1180-07-MCA Minneapolis MN, 55401 United States	Electronic Service		No	20-800 Official
46	J.B.	Matthews		Cushman & Wakefield/NorthMarq		3500 American Blvd W - #200 Minneapolis MN, 55431 United States	Paper Service		No	20-800 Official
47	Craig	McDonnell	craig.mcdonnell@state.mn.us		Minnesota Pollution Control Agency	520 Lafayette Road St. Paul MN, 55101 United States	Electronic Service		No	20-800 Official
48	Matthew	Melewski	matthew@theboutiquefirm.com	Nokomis Energy LLC & Ole Solar LLC		2639 Nicollet Ave Ste 200 Minneapolis MN, 55408 United States	Electronic Service		No	20-800 Official
49	Joseph	Meyer	joseph.meyer@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	Bremer Tower, Suite 1400 445 Minnesota Street St Paul MN, 55101-2131 United States	Electronic Service		No	20-800 Official
50	Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP		33 South Sixth St Ste 4200 Minneapolis	Electronic Service		No	20-800 Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						MN, 55402 United States				
51	Pouya	Najmaie	najm0001@gmail.com	Cooperative Energy Futures		3416 16th Ave S Minneapolis MN, 55407 United States	Electronic Service		No	20-800 Official
52	David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency		220 South Sixth Street Suite 1300 Minneapolis MN, 55402 United States	Electronic Service		No	20-800 Official
53	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	20-800 Official
54	Logan	O'Grady	logrady@mnseia.org	Minnesota Solar Energy Industries Association		2288 University Ave W St. Paul MN, 55114 United States	Electronic Service		No	20-800 Official
55	Carol A.	Overland	overland@legalelectric.org	Legalelectric - Overland Law Office		1110 West Avenue Red Wing MN, 55066 United States	Electronic Service		No	20-800 Official
56	Greg	Palmer	gpalmer@greatermngas.com	Greater Minnesota Gas, Inc.		1900 Cardinal Ln PO Box 798 Faribault MN, 55021 United States	Electronic Service		No	20-800 Official
57	Jennifer	Peterson	jjpeterson@mnpower.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	20-800 Official
58	Kristen	Peterson	kristenp@ips-solar.com	New Energy Equity		2670 Patton Road Roseville MN, 55113 United States	Electronic Service		No	20-800 Official
59	Gordon	Pietsch	gpietsch@greenergy.com	Great River Energy		12300 Elm Creek Blvd. Maple Grove MN, 55369-4718 United States	Electronic Service		No	20-800 Official
60	Phyllis	Reha	phyllisreha@gmail.com			3656 Woodland Trail Eagan MN, 55123 United States	Electronic Service		No	20-800 Official
61	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	20-800 Official
62	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	20-800 Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
63	Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates		7400 Lyndale Ave S Ste 190 Richfield MN, 55423 United States	Electronic Service		No	20-800 Official
64	Bria	Shea	bria.e.shea@xcelenergy.com	Xcel Energy		414 Nicollet Mall Minneapolis MN, 55401 United States	Electronic Service		No	20-800 Official
65	Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.		76 W Kellogg Blvd St. Paul MN, 55102 United States	Electronic Service		No	20-800 Official
66	Peggy	Sorum	peggy.sorum@centerpointenergy.com	CenterPoint Energy		505 Nicollet Mall Minneapolis MN, 55402 United States	Electronic Service		No	20-800 Official
67	Sky	Stanfield	stanfield@smwlaw.com	Shute, Mihaly & Weinberger		396 Hayes Street San Francisco CA, 94102 United States	Electronic Service		No	20-800 Official
68	Byron E.	Starns	byron.starns@stinson.com	STINSON LLP		50 S 6th St Ste 2600 Minneapolis MN, 55402 United States	Electronic Service		No	20-800 Official
69	Richard	Stasik	richard.stasik@wecenergygroup.com	Minnesota Energy Resources Corporation (HOLDING)		231 West Michigan St - P321 Milwaukee WI, 53203 United States	Electronic Service		No	20-800 Official
70	Kristin	Stastny	kstastny@taftlaw.com	Taft Stettinius & Hollister LLP		2200 IDS Center 80 South 8th Street Minneapolis MN, 55402 United States	Electronic Service		No	20-800 Official
71	Cary	Stephenson	cstephenson@otpc.com	Otter Tail Power Company		215 South Cascade Street Fergus Falls MN, 56537 United States	Electronic Service		No	20-800 Official
72	Jason	Topp	jason.topp@lumen.com	Qwest Communications Company, LLC.		200 S 5th St Ste 2200 Minneapolis MN, 55402 United States	Electronic Service		No	20-800 Official
73	Jenna	Warmuth	jwarmuth@mnpower.com	Minnesota Power		30 W Superior St Duluth MN, 55802-2093 United States	Electronic Service		No	20-800 Official
74	Sarah	Whebbe	swhebbe@mnseia.org	MnSEIA		445 Minnesota Street Suite 730 St. Paul MN, 55101 United States	Electronic Service		No	20-800 Official
75	Patricia	Whitney	patricia@pwhitneylaw.com	St. Paul Assn of Responsible Landlords		627 Snelling Avenue South St. Paul MN, 55116 United States	Electronic Service		No	20-800 Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
76	Joseph	Windler	jwindler@winthrop.com	Winthrop & Weinstine		225 South Sixth Street, Suite 3500 Minneapolis MN, 55402 United States	Electronic Service		No	20-800 Official
77	Robyn	Woeste	robynwoeste@alliantenergy.com	Interstate Power and Light Company		200 First St SE Cedar Rapids IA, 52401 United States	Electronic Service		No	20-800 Official
78	Yochi	Zakai	yzakai@smwlaw.com	SHUTE, MIHALY & WEINBERGER LLP		396 Hayes Street San Francisco CA, 94102 United States	Electronic Service		No	20-800 Official
79	Curtis	Zaun	czaun@mnseia.org	MnSEIA		PO Box 8141 Saint Paul MN, 55108 United States	Electronic Service		No	20-800 Official
80	Kurt	Zimmerman	kwz@ibew160.org	Local Union #160, IBEW		2909 Anthony Ln St Anthony Village MN, 55418-3238 United States	Electronic Service		No	20-800 Official
81	Patrick	Zomer	pzomer@cozen.com	Cozen O'Connor		150 S. 5th Street, #1200 Minneapolis MN, 55402 United States	Electronic Service		No	20-800 Official