

**State of Minnesota
Before the Public Utilities Commission**

Katie Sieben	Chair
Hwikwon Ham	Commissioner
Audrey Partridge	Commissioner
Joseph Sullivan	Commissioner
John Tuma	Commissioner

In the Matter of the Application of Xcel Energy's
Petition for Authority to Increase Natural Gas
Rates in Minnesota

Docket No. G-002/GR-25-356

Initial Comments of the Citizens Utility Board of Minnesota

The Citizens Utility Board of Minnesota ("CUB") respectfully submits the following comments to the Minnesota Public Utilities Commission ("the Commission") regarding Northern States Power Company, d/b/a Xcel Energy's ("Xcel" or "the Company") application to increase its natural gas rates.

I. INTRODUCTION

On October 31, 2025, Xcel submitted an application requesting the Commission's approval to increase its natural gas rates by approximately \$63.40 million, or 8.2 percent, for the test year ending December 31, 2026.¹ On average, the proposed rate change would increase the bill for a typical residential natural gas customer by \$7.11 per month or \$85.32 annually.² If the Commission chooses to suspend the proposed rate increase pursuant to Minn. Stat. § 216B.16, Subd. 2, the Company further requests authorization to recover interim rates of \$51.47 million, or 6.8 percent, starting January 1, 2026.³ According to Xcel, this interim increase would, on average, amount to \$5.84 per month or \$70.08 per year for residential customers.⁴

On November 3, 2025, the Commission issued a Notice requesting comments on the following topics:

- Whether Xcel Energy's application complies with the filing requirements of Minn. Stat. § 216B.16, Minn. Rules, parts 7825.3100 to 7825.4400, and relevant Commission Orders; and

¹ *In the Matter of the Application of Xcel Energy's Petition for Authority to Increase Natural Gas Rates in Minnesota*, Initial Filing, Docket No. G-002/GR-25-356 (Oct. 31, 2025)

² *In the Matter of the Application of Xcel Energy's Petition for Authority to Increase Natural Gas Rates in Minnesota*, Docket No. G-002/GR-25-356, Notice of Change in Rates at 3 (Oct. 31, 2025).

³ *In the Matter of the Application of Xcel Energy's Petition for Authority to Increase Natural Gas Rates in Minnesota*, Notice of Change in Rates and Interim Rate Petition, Docket No. G-002/GR-25-356 (Oct. 31, 2025), p. 1.

⁴ *In the Matter of the Application of Xcel Energy's Petition for Authority to Increase Natural Gas Rates in Minnesota*, Notice of Change in Rates and Interim Rate Petition, Docket No. G-002/GR-25-356 (Oct. 31, 2025), p. 3. We note that Xcel also filed a Petition for Approval of SEP Rider Recovery with True-Up Mechanisms on October 31, 2025. See Docket No. G002/M-25-403. In that filing, Xcel offers to withdraw the rate case filed in the present docket if the Commission instead approves a separate true-up proposal. CUB filed separate comments in docket 25-403 recommending this proposal be denied.

- Whether this matter should be sent to the Court of Administrative Hearings for a contested case hearing and if so, what should be the scope of the hearing?⁵

For the reasons discussed below, CUB recommends that the Commission: 1) suspend final rates and refer the proposed rate increase to the Court of Administrative Hearings for a contested case proceeding; 2) reduce any interim rate increase to account for ongoing exigent circumstances affecting customers harmed as a result of the federal government shutdown, including furloughed or unpaid federal workers and those harmed by the loss of LIHEAP, SNAP, or other federal assistance programs; and 3) approve CUB's petition to intervene in the contested case proceeding. Additionally, we recommend that the Commission order Xcel to notify its customers by email of its proposed rate increase and provide them a live link providing instructions on how to file public comments on the rate case.

II. ANALYSIS

- A. The Commission should suspend implementation of the proposed rate schedule and refer the matter to the Court of Administrative Hearings.

Under Minn Stat. § 216B.16, a rate increase proposed by a regulated utility becomes effective 60 days from filing, unless it is suspended by the Commission pursuant to Minn. Stat. § 216B.16, subd. 2 to permit an adequate examination of its reasonableness. During such a suspension, If the Commission finds that all significant issues raised have not been resolved to its satisfaction, it must refer the matter to the Court of Administrative Hearings with instructions for a contested case proceeding.⁶ Minnesota Law generally requires a final determination on the rate case within ten months. However, Minn. Stat. § 216B.16, subd. 2(f) allows the Commission to extend the suspension period by up to 90 additional days if it determines it needs additional time to make a determination. CUB recommends that the Commission suspend implementation of final rates and refer this matter to the CAH for a contested case proceeding.

- B. The Commission should make a finding that exigent circumstances exist and reduce interim rates.

Utilities are generally permitted to charge interim rates during the pendency of a rate case proceeding based on the statutory formulas set forth in Minn. Stat. § 216B.16, Subd. 3. If, however, the Commission finds that exigent circumstances exist, it is permitted to deviate from these statutory methods and develop an alternative framework for the setting of such rates.⁷ Although not defined by statute or Commission rule, the Minnesota Supreme Court has characterized "exigent

⁵ *In the Matter of the Application of Xcel Energy's Petition for Authority to Increase Natural Gas Rates in Minnesota*, Notice of Comment Period, Docket No. G-002/GR-25-356 (Nov. 2, 2025)

⁶ Minn Stat. § 216B.16 Subd. 2(b).

⁷ Minn. Stat. § 216B.16, Subd. 3(b).

circumstances” as “demand[ing] unusual or immediate action” which “may allow people to circumvent usual procedures.”⁸ In the context of setting interim rates, the Commission is accorded judicial deference in determining whether an exigency exists, and whether adjustments to the statutory formulas must be made to account for cost and non-cost factors pertinent to the setting of just and reasonable rates.⁹

i. The shutdown of the federal government warrants a finding of exigent circumstances.

By law, the Commission must consider “ability to pay” when setting utility rates, including interim charges.¹⁰ As CUB has explained in other contexts, customers’ ability to pay for utility services is impacted not only by the price of electricity, but also by factors such as income, household size, nondiscretionary expenditures, and the availability of assistance resources.¹¹ Since the beginning of October, the shutdown of the federal government has inflicted significant and continuing harms on federal workers, income-limited households, and other residential and business customers throughout Xcel’s service territory. Even as Congress advances efforts to reopen the government, millions of Americans will continue to suffer the effects of the longest shutdown in history.¹² These economic and financial consequences warrant a finding of exigent circumstances as they threaten customers’ ability to pay for utility services both now and in the future.

For over a month, 1.4 million federal employees have gone without a paycheck as a result of being furloughed or forced to work without pay.¹³ The Minnesota Association of Professional Employees (“MAPE”) estimates approximately 18,000 Minnesotans working for the federal government have been furloughed or reassigned, worked without pay, or threatened with termination because of the shutdown.¹⁴ Many of these workers have had to turn to food shelves and loans to pay their bills and put food on the table.¹⁵ Even after the shutdown eventually ends, the Trump administration has indicated its intent to withhold backpay for up to 750,000 employees.¹⁶ Federal contractors, which are facing similar employment challenges, are also unlikely to receive any compensation during the shutdown or backpay after its conclusion.¹⁷

⁸ *In re Minn. Power for Auth. to Increase Rates for Elec. Serv. in Minn.*, 838 N.W.2d, 747, 757 (Minn. 2013) (citing *Blacks Law Dictionary* 227 (9th ed. 2009)).

⁹ *Id.* at 755, 759-761.

¹⁰ Minn. Stat. § 216B.16, Subd. 15.

¹¹ See, e.g., *In the Matter of the Application of Xcel Energy for Authority to Increase Rates for Electric Service in Minnesota*, Docket No. E-002/GR-24-320, CUB Ex. ___, Direct Testimony of Annie Levenson-Falk at 5-6 (Aug. 22, 2025).

¹² Manu Raju et al., *Senate Advances Deal to Reopen Government After Centrist Democrats Strike Major Deal to End Shutdown*, CNN (Nov. 9, 2025).

¹³ Aaron Till & Fredrick Hernandez, *Who Is Missing Paychecks in the 2025 Shutdown—When and Where?*, BIPARTISAN POLICY CTR. (Oct. 14, 2025).

¹⁴ MINN. ASSOC. OF PROF’L EMPS., *Government Shutdown Update*, <https://mape.org/news/government-shutdown-update> (Oct. 15, 2025).

¹⁵ See, e.g., Lisa Desjardins et al., *PBS NEWS HOUR, As Federal Workers Miss Paychecks During Shutdown, Many Turn to Food Banks for Relief* (Oct. 24, 2025).

¹⁶ Tony Romm, *White House Signals It May Try to Deny Back Pay to Furloughed Federal Workers*, NEW YORK TIMES (Oct. 7, 2025); Megan Cerullo, *Here’s What Federal Workers Should Know About Getting Retroactive Pay*, CBS NEWS (updated Oct. 27, 2025).

¹⁷ Matt Egan, *‘I Don’t Know How I’m Going to Feed My Kids’: Shutdown Hits Federal Contractors Hard*, CNN (Oct. 7, 2025).

Numerous programs and services reliant on these federal workers have languished during the shutdown. For example, MAPE has indicated that over 15,000 Minnesotans are awaiting disability determinations or for their claims to be assigned to adjudicators.¹⁸ These decisions—and the assistance households are waiting for—are expected to be delayed by weeks or months.¹⁹

Further exacerbating the issue, Congress' failure to enact any appropriations bill or continuing resolution before the 2026 fiscal year has also decimated assistance resources meant to aid income-limited households around the country. The Low-Income Home Energy Assistance Program ("LIHEAP") has been unable to provide funding to help more than six million households afford basic utility services.²⁰ In Minnesota, more than 125,000 households relied on LIHEAP during the 2025 fiscal year, which prevented over 35,000 disconnections and provided heating fuel or furnace repairs to more than 17,000 households.²¹ After the end of the shutdown, it is expected to take at least four weeks for state benefit amounts to be calculated, which could be further extended as a result of the federal government's termination of the entire LIHEAP staff earlier this year.²² Uncertainty regarding the availability of energy assistance resources will likely continue well into the future given the Trump Administration's stated intent to eliminate LIHEAP funding.²³ Although it is not clear whether these threats will come to fruition, the reopening of the federal government will not immediately resolve mounting energy affordability concerns or mitigate future crises related to assistance availability.

Food benefits available through the Supplemental Nutrition Assistance Program ("SNAP") were also delayed for the first time in history at the beginning of November.²⁴ More than 440,000 Minnesotans rely on SNAP, including 72,000 seniors, 52,000 adults with disabilities, and over 150,000 children.²⁵ The federal government has challenged legal orders to disburse these funds, raising questions about the continued availability of SNAP.²⁶

¹⁸ MINN. ASSOC. OF PROF'L EMP'S., *Government Shutdown Update*, <https://mape.org/news/government-shutdown-update> (Oct. 15, 2025).

¹⁹ *Id.*

²⁰ MINN. DEP'T OF COMMERCE, *Energy Assistance Program* (last updated Nov. 3, 2025) (explaining that "EAP is still waiting for federal funding for this program year" and that while applications are being accepted, "[b]enefits will be delayed due to the government shutdown"); NAT'L ENERGY ASSISTANCE DIRECTORS ASSOC., *President's FY 2026 Budget Eliminates Federal Funding for LIHEAP*, <https://neada.org/wp-content/uploads/2025/05/Presidents-FY-26-Budget-LIHEAP-1-1.pdf> (last accessed Nov. 4, 2025) (noting that LIHEAP provides \$4 billion in assistance dollars to about 6 million households every year).

²¹ MINN. DEP'T OF COMMERCE, *Energy Assistance Program Dashboard*, <https://mn.gov/commerce/energy/policy-data-reports/energy-assistance-dashboard/> (last updated Nov. 10, 2025).

²² Damali Ramirez, *Get the Facts: Despite Shutdown Deal, LIHEAP Funds Are Still Delayed. Here's Why*, WCVB-5 (last updated Nov. 10, 2025); Brad Plumer, *Entire Staff is Fired at Office that Helps Poorer Americans Pay for Heating*, NEW YORK TIMES (Apr. 2, 2025).

²³ EXECUTIVE OFFICE OF THE PRESIDENT, *Recommendations on Discretionary Funding Levels for Fiscal Year 2026* at 9, <https://www.whitehouse.gov/wp-content/uploads/2025/05/Fiscal-Year-2026-Discretionary-Budget-Request.pdf> (May 2, 2025); see also NAT'L ENERGY ASSISTANCE DIRECTORS ASSOC., *President's FY 2026 Budget Eliminates Federal Funding for LIHEAP*, <https://neada.org/wp-content/uploads/2025/05/Presidents-FY-26-Budget-LIHEAP-1-1.pdf> (last accessed Jul. 11, 2025).

²⁴ Adriana Gomez Licon, *Trump Administration Posts Notice that No Federal Food Aid Will Go Out Nov. 1*, ASSOC. PRESS (Oct. 26, 2025); Zach Rodvold, *Food Banks: Without SNAP, We Can't Handle the Demand*, MINN. REFORMER (Nov. 3, 2025).

²⁵ MINN. DEP'T OF CHILDREN, YOUTH, & FAMILIES, *Why SNAP Matters for Minnesota* (last accessed Oct. 27, 2025).

²⁶ David Lieb et al., *Supreme Court Issues Emergency Order to Block Full SNAP Food Aid Payments*, ASSOC. PRESS (Nov. 7, 2025); Ian Thomas, *Trump Administration Demands That States 'Undo' Full SNAP Benefit Payments*, CNBC (Nov. 9, 2025).

Minnesotans will also begin to see elevated insurance premiums during the 2026 fiscal year. Congress has been unable to reach agreement on the extension of federal tax credits available through the Affordable Care Act.²⁷ Even without accounting for these subsidies, Minnesotans' health insurance premiums are set to rise by 22 percent in 2026.²⁸ If federal tax credits are eventually eliminated, premiums for lower-income, middle class, and older Minnesotans would likely more than double.²⁹

In addition to residential impacts, the government shutdown is hurting the broader economy, with the Congressional Budget Office estimating the United States will face unrecovered GDP losses of between \$7 and \$14 billion.³⁰ The Small Business Administration has similarly indicated that the loss of federal loan programs has kept local Minnesota businesses from accessing \$18 million each week.³¹ Taken individually, these various factors might not rise to the level of exigency. When considered in the aggregate, however, they have a debilitating impact on the economy and customers' ability to pay for electricity service. We therefore respectfully request the Commission to make a finding that exigent circumstances exist.

ii. The Commission should reduce interim rates.

With a finding of exigent circumstances, the Commission is authorized to depart from the statutory formula for determining interim rates and develop an alternative framework that balances utility and ratepayer interests.³² In recent proceedings, the Commission reduced interim rates after finding the COVID-19 pandemic constituted an exigency that eroded the purchasing power of Minnesota households.³³ The federal government shutdown has produced similar hardships that severely limit residential and business customers' ability to pay for utility service. After the government reopens, it will take time to resume federal programs and disburse assistance resources.

As proposed, the Company's request to implement residential interim rates that are 6.8 percent above present revenues would pose a substantial challenge for households dealing with the consequences of the government shutdown. CUB respectfully recommends that the Commission set an interim rate schedule that is, at most, 50 percent of the Company's request. Even this adjusted interim increase could impose a hardship on customers throughout Xcel's service territory. Should the Commission or other stakeholders believe a further reduction is warranted, we would support that decision.

²⁷ See, e.g., Selena Simmons-Duffin, *What's Behind the Health Care Fight that Led to the Government Shutdown*, NPR (Oct. 2, 2025); Manu Raju et al., *Senat Advances Deal to Reopen Government After Centrist Democrats Strike Major Deal to End Shutdown*, CNN (Nov. 9, 2025).

²⁸ Erica Zurek, *Minnesota Health Insurance Premiums Will Rise Sharply in 2026*, MPR NEWS (Oct. 1, 2025).

²⁹ Alex Leeds Matthews & Tami Luhby, *Who Will Get Hardest by ACA Premium Increases in Four Charts*, CNN (Nov. 7, 2025).

³⁰ U.S. CONG. BUDGET OFF., *A Quantitative Analysis of the Effects of the Government Shutdown on the Economy Under Three Scenarios, as of October 29, 2025* (Oct. 29, 2025).

³¹ U.S. SMALL BUS. ADMIN., *SBA Releases State-Level Analysis of Shutdown Impact on Small Business Lending* (Oct. 21, 2025).

³² Minn. Stat. § 216B.16, Subd. 3(b); *In re Minn. Power*, 838 N.W.2d at 754-58, 761-62.

³³ See, e.g., *In the Matter of the Application by Minnesota Power for Authority to Increase Rates for Electric Service in Minnesota*, Docket No. E-015/GR-21-335, Order Setting Interim Rates at 4 (Dec. 30, 2021); *In the Matter of the Application of Northern States Power Company d/b/a Xcel Energy for Authority to Increase Rates for Electric Service in the State of Minnesota*, Docket No. E-002/GR-21-630, Order Setting Interim Rates at 7 (Dec. 23, 2021).

C. The Commission should approve CUB's petition to intervene in the contested case.

Minn. Rule 7829.2400, subpart 6 provides: "[t]he commission shall entertain a petition to intervene until the matter is referred to the Office of Administrative Hearings for a contested case proceeding or until the commission issues a notice under part 7829.1200, subpart 3, stating its intention to decide the matter on the basis of an informal or expedited proceeding." CUB hereby petitions to intervene in a contested case proceeding addressing this matter, with all rights of a party.

CUB is well positioned to present issues and develop facts to assist the Commission in fully considering Xcel's petition to increase rates for electric service. As a 501(c)(3) nonprofit advocate for Minnesota's residential utility consumers, CUB has two main roles. First, we serve as a unique resource for people throughout Minnesota to help them better understand how they use and pay for their energy. We aid customers in navigating assistance programs and help identify tools they can utilize to reduce both financial costs and environmental impacts of their energy use. Second, CUB acts as a voice for regular people in energy-related legislative and regulatory proceedings. In this function, we play an important role in helping the Commission balance ratepayers' interests with those of the utilities and other advocates. CUB has consulted with hundreds of residential consumers who are struggling to pay their bills and who are at risk of disconnection or have already been disconnected. Many of these individuals are Xcel electric customers. We assist consumers in navigating the various pathways for billing assistance and shutoff protections, and we are able to bring those consumer experiences to bear to help inform regulatory decision-making.

CUB's staff and its outside consultants have extensive experience and expertise in analyzing the economic considerations inherent in this rate case, including utilities' authorized rate of return and rate recovery of expenses related to lobbying and dues paid to membership-based organizations. In this docket, CUB plans to evaluate the reasonableness of Xcel's proposed increase to its authorized return on equity ("ROE"). CUB is also reviewing Xcel's increased capital investments. Finally, we plan to review Xcel's treatment of late fees and interest associated with late bill payments and any discussion of load flexibility offerings. This list is preliminary. CUB may discover additional issues to address through further examination and investigation and therefore reserves the right to raise and address additional issues through appropriate means.

CUB regularly participates in dockets before the Commission. We have intervened and/or participated in a variety of Commission proceedings involving rates, bills and related issues, including the following recent dockets.

- *In the Matter of the Application of Xcel Energy for Authority to Increase Rates for Electric Service in Minnesota* (OAH Docket 28-2500-40515; MPUC Docket No. E-002/M-24-320)
- *In the Matter of the Application of Xcel Energy Resources Corp. d/b/a Xcel Energy Minnesota Gas for Authority to Increase Rates for Natural Gas Service in the State of Minnesota* (OAH Docket 65-2500-39699; MPUC Docket No. G-008/GR-23-173)

- *In the Matter of the Application of Northern States Power Company for Authority to Increase Rates for Natural Gas Service in Minnesota* (OAH Docket 23-2500-39704MPUC Docket No. G-002/GR-23-413)
- *In the Matter of the Application of Minnesota Energy Resources Corporation for Authority to Increase Rates for Natural Gas Utility Service in Minnesota* (OAH Docket No. 82-2500-38907; MPUC Docket No. G011/GR-22-504)
- *In the Matter of the Application of Northern States Power Company d/b/a Xcel Energy for Authority to Increase Rates for Electric Utility Service in Minnesota* (OAH Docket No. 22-2500-37994; MPUC Docket No. E002/GR-21-630)
- *In the Matter of the Application of Minnesota Power for Authority to Increase Rates* (OAH Docket No. 5-2500-38008; MPUC Docket No. E015/GR-21-335)
- *In the Matter of the Petitions for Recovery of Certain Gas Costs* (OAH Docket No. 71-2500-37763; MPUC Docket Nos. G-008/M-21-138, G004/M-21-235, G-002/CI-21-610, G-011/CI-21-611)
- *In the Matter of the Inquiry into Actions by Electric and Natural Gas Utilities in Light of the COVID-19 Pandemic Emergency* (MPUC Docket No. E,G999/CI-20-375)
- *In the Matter of an Xcel Payment Plan Credit Proposal* (MPUC Docket No. E002/M-20-760)
- *In the Matter of the Application of Minnesota Power for Authority to Increase Electric Service Rates in Minnesota* (MPUC Docket No. E-015/GR-19-442)
- *In the Matter of an Inquiry into Utility Investments that May Assist in Minnesota's Economic Recovery from the COVID-19 Pandemic* (MPUC Docket No. E,G999/CI-20-492)
- *In the Matter of the Petition for Approval of Changes to Minnesota Power's Residential Rate Design* (MPUC Docket No. E015/M-20-850)

For these reasons, CUB respectfully requests that the Commission grant its petition to intervene in this proceeding to help ensure that Xcel's electric rates are not overly burdensome and consistent with the interests of its ratepayers.

D. The Commission should Require the Company to Notify its Customers by Email of the Proposed Rate increase

General rate case notice requirements can be found in Minn. Stat. § 216B.16, subd. 1, and Minn. Rules, Part 7829.2400, subparts 3 and 7. In combination, these regulations require a utility filing a general rate case to notify the Commission, as well as municipalities, counties, and ratepayers in the utility's service territory. Typically, such notice is provided via publication in local newspapers and a bill insert delivered to ratepayers.

After filing its latest electric rate case in docket 24-320, Xcel sent the below email to its customers, with live links to additional information on its "new rates proposal" and details on how to "submit a comment" to the PUC. We believe this email has helped facilitate an unprecedented level of public engagement in Xcel's ongoing electric rate case. By our latest count, around 7,000 public comments have been filed in docket 24-320. From our perspective, this is a very positive development, and we

encourage both Xcel and the Commission to continue fostering this level of public engagement in the regulatory process.

New Electric Rates Proposed for Minnesota Customers

Dear Valued Customer,

On November 1, Xcel Energy proposed new electric rates for Minnesota customers to begin in 2025 and 2026. Our rate proposal to the Minnesota Public Utilities Commission (MPUC) supports our commitment to provide reliable, safe, and clean electric service to our customers, including investments in:

- Enhanced reliability and resiliency of the system that serves customers,
- Clean energy projects that lock in fuel savings for customers,
- Our carbon-free nuclear plants that are key to meeting our clean energy goals,

The requested 2025 increase is approximately 9.6%, or \$9.89, to an average residential customer's monthly electric bill. The requested 2026 increase is for an additional 3.6%, or \$3.90. While the MPUC reviews Xcel Energy's request, **the interim rate increase for 2025 will be 5.2%, or \$5.39**, per month for an average residential customer.

[New Rates Proposal](#)

Customers may submit a comment on our rate proposal to the MPUC online, by mail or email. Please follow the link below and **reference Docket No. E002/GR-24-320** in your comment.

[Submit a Comment](#)

Sincerely,

Xcel Energy

Programs & Rebates

We hope that Xcel plans to also notify its natural gas customers by email of this proposed rate increase and to again include in that email links for additional information about the rate increase and instructions on how to submit a public comment. Whether or not Xcel intends to do so voluntarily, we believe it would be good practice for the Commission to regularly require an email notice to ratepayers for all utilities filing rate cases moving forward. Therefore, we recommend that the Commission formally order Xcel to provide an email notice to its customers, including a link with instructions on how to file a public comment, when informing them of any interim rate increase or other developments that occur as a result of the Commission's decisions in this comment period.

III. CONCLUSION

In conclusion, CUB recommends that the Commission:

1. suspend final rates and refer the proposed rate increase to the Court of Administrative Hearings for a contested case proceeding;
2. reduce any interim rate increase to account for ongoing exigent circumstances affecting customers harmed as a result of the federal government shutdown;
3. approve CUB's petition to intervene in the contested case proceeding; and
4. order Xcel to notify its customers by email of its proposed rate increase and provide them a live link providing instructions on how to file public comments on the rate case.

Thank you for considering these comments.

Respectfully submitted,

November 12, 2025

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