



414 Nicollet Mall  
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February 16, 2024

—Via Electronic Filing—

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

RE: COMMENTS  
COMMISSION INQUIRY INTO PRIVACY POLICIES OF RATE-REGULATED  
ENERGY UTILITIES  
CITIZENS UTILITY BOARD PETITION TO ADOPT OPEN ACCESS DATA STANDARDS  
DOCKET NOS. E,G999/CI-12-1344 AND E,G999/M-19-505

Dear Mr. Seuffert:

Northern States Power Company, doing business as Xcel Energy, submits the enclosed Comments in response to the December 1, 2023 NOTICE OF COMMENT PERIOD ON REFINEMENTS TO OPEN DATA ACCESS STANDARDS of the Minnesota Public Utilities Commission in the above-referenced dockets.

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 Mustafa Adam at [mustafa..k.adam@xcelenergy.com](mailto:mustafa..k.adam@xcelenergy.com) or me at [bridget.dockter@xcelenergy.com](mailto:bridget.dockter@xcelenergy.com) or (612) 337-2096 if you have any questions regarding this filing.

Sincerely,

/s/

BRIDGET DOCKTER  
MANAGER, POLICY AND OUTREACH

Enclosure  
c: Service Lists

STATE OF MINNESOTA  
BEFORE THE  
MINNESOTA PUBLIC UTILITIES COMMISSION

Katie J. Sieben	Chair
Hwikwon Ham	Commissioner
Valerie Means	Commissioner
Joseph K. Sullivan	Commissioner
John A. Tuma	Commissioner

IN THE MATTER OF A COMMISSION  
INQUIRY INTO PRIVACY POLICIES OF  
RATE-REGULATED ENERGY UTILITIES

DOCKET NO. E,G999/CI-12-1344

IN THE MATTER OF A PETITION BY  
CITIZENS UTILITY BOARD OF  
MINNESOTA TO ADOPT OPEN ACCESS  
DATA STANDARDS

DOCKET NO. E,G999/M-19-505

**COMMENTS**

**INTRODUCTION**

Northern States Power Company, doing business as Xcel Energy, submits the enclosed Comments in response to the NOTICE OF COMMENT PERIOD issued on December 1, 2023 of the Minnesota Public Utilities Commission (Commission) in the above-referenced dockets.

The Notice requests input on “What actions should the Commission take regarding further refinement of the Open Data Access Standards (ODAS or Standards) policies on the release of anonymized Customer Energy Usage Data (CEUD).”

Xcel Energy has stated its position on anonymized data throughout this proceeding. The Company does not provide anonymized data to third parties unless required by the Commission, recognizing Section III.C. of the ODAS. We do not believe we have sufficient technical assurance that the current proposed framework will adequately protect customers’ anonymity as required by the Commissions data privacy dockets. In order to adequately protect our customers, we continue to believe that a technical assessment of anonymized CEUD standards needs to be conducted by an expert in the field, and an objective basis established for assessing the risk of re-identification of customer data for a given scope and time interval. These concerns are underscored by the ongoing proceedings in the Grid Security (Docket No. E999/CI-20-800),

heightened geopolitical risks such as the war in Ukraine, rising tensions with China, and increased Domestic Violent Extremist activity. The result is that the Company continues to be discerning about what information we release publicly or to third parties in relation to CEUD.

## COMMENTS

### I. BACKGROUND

The Commission has been balancing consumer privacy and public access to CEUD for many years. In 2012, the Commission initiated an investigation into the collection, storage, and dissemination of customer data by rate-regulated utilities. In 2014, the Commission issued two customer data privacy orders, which adopted a broad definition of Personally Identifiable Information (“PII”) and required utilities to adopt specific processes to ensure the protection of PII.<sup>1</sup> This definition remains within the ODAS today. Then in January 2017, the Commission issued an order governing disclosure of CEUD to third parties and declared, among other things, that a utility should “refrain from disclosing CEUD without the customer’s consent unless the utility has adequately protected the customer’s anonymity.”<sup>2</sup> The Commission also stated that it would “not specify any one technique or procedure a utility must follow to adequately protect a customer’s anonymity.”<sup>3</sup>

In August 2019, the Citizens Utility Board of Minnesota (CUB) filed a petition to initiate a proceeding to adopt Standards for the sharing of aggregated or anonymized CEUD.<sup>4</sup> After receiving input from numerous stakeholders, in November 2020, the Commission adopted a set of Standards, addressing both aggregated CEUD and anonymized CEUD with different standards for each type. The application of the Standards was limited: it did not authorize application to any use case related to anonymized CEUD; it was only available for building level and public purpose data aggregation to building owners/managers, local units of government, and non-profit organizations that use that data for public interest energy research; and it exempted commercial/industrial (C&I) customers with peak demands greater than 5 megawatts (MW). Recognizing that refinement of these Standards would be required, the

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<sup>1</sup> In the Matter of a Commission Inquiry into Privacy Policies of Rate-Regulated Energy Utilities, Order Requiring Utilities to Adopt and Document Processes Regarding Personally Identifiable Information and other Action, Docket No E,G999/CI-12-1344, June 24, 2014, Order Point 2 and Revised September 9, 2014, Order Point 2.

<sup>2</sup> In the Matter of a Commission Inquiry into Privacy Policies of Rate-Regulated Energy Utilities; Order Governing Disclosure of Customer Energy Use Data to Third Parties, Requiring Filing of Privacy Policies and Cost Data, and Soliciting Comment, Docket No E,G999/CI-12-1344, January 19, 2017; Order Point 2.

<sup>3</sup> *Id.* at 8.

<sup>4</sup> In the Matter of a Petition by Citizens Utility Board of Minnesota to Adopt Open Data Access Standards, Docket No. E,G-999/M-19-505.

Commission further requested that the Commissioner of Commerce seek authority to incur costs necessary to retain an independent expert to provide comments on a number of outstanding issues identified in the proceeding.

Pursuant to the effort to seek expert input, in February 2021, the Commission hosted a technical conference with the Regulatory Assistance Project (RAP) regarding other states' approaches to customer data practices and standards. RAP filed an issue brief addressing CEUD access in Minnesota and in other jurisdictions.<sup>5</sup> In that brief, RAP's study showed that at that time, Illinois and California had authorized utilities to provide anonymized data under varying requirements. Many of those requirements have since been integrated into Minnesota's ODAS.

The Department of Commerce (Department) also issued an RFP in March and again in April of 2021 for an independent expert. The Department filed a letter in August 2021 notifying the Commission that it could not identify an expert, and that it would consult with the Department of Administration "on retaining an expert in the area of data privacy."<sup>6</sup> The Department also indicated it would "seek assurance the state does not have pre-existing guidance concerning data practices and the types of policies the Department should or should not be supporting...until the Department has obtained sufficient assurances of its ability to make data-related recommendations that uphold the public interest and adhere to existing state policies, the Department cannot provide further policy recommendations."

The Standards were further refined in April 2022, when the Commission addressed a Minneapolis ordinance that required residential property owners to disclose building average energy use information to prospective tenants. Under the existing Standards, property owners would have needed to first receive tenant consent. The order authorized disclosure of CEUD confidence intervals reflecting tenants' average energy usage to local governments without prior customer consent.<sup>7</sup>

In February 2022, the Commission requested comments on further refining the Standards. After again considering the perspectives of numerous stakeholders, the Commission's March 2023 Order, among other things, expanded application of the Standards to requests for aggregated CEUD including municipal boundaries and county boundaries and delegated authority to the Executive Secretary to establish a

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<sup>5</sup> Regulatory Assistance Project, Access to Aggregated or Anonymized Customer Energy Use Data, filed in Docket No. E,G-999/M-19-505 (October 25, 2021).

<sup>6</sup> Notice of Request for Proposals, March 5, 2021 & Letter, Updating the Commission on RFP Status, August 6, 2021; Docket Nos. E,G999/CI-12-1344 and E,G999/M-19-505.

<sup>7</sup> In the Matter of a Joint Petition for Approval of the Process to Release Whole Building Data to Facilitate Local Residential Rental Ordinance Compliance, Docket No. E,G002,008/M-21-761, Order Approving Petition with Modifications (April 13, 2022).

comment period to further develop the record on various topics related to anonymized data.

On December 1, 2023, the Commission issued a notice of comment to address Order point 5 of the March 2023 Order, which are addressed in these Comments.

5. *The Commission delegates authority to the Executive Secretary to establish a comment period to further develop the record on the following topics regarding anonymized data under the Commission's approved Open Data Access Standards:*
- a. Identification of anonymized CEUD use-cases;*
  - b. Refinement of specific provisions of the contract requirements for anonymized data access for identified use cases;*
  - c. Ascertaining the appropriate threshold for limiting the application of the Standards to commercial and industrial natural gas and electric customers for anonymized CEUD requests;*
  - d. Establishing the shortest data time interval for anonymized CEUD requests under the Standards;*
  - e. Ascertaining the preferred method by which to apply the 15/15 anonymization screen to CEUD at 15-minute and hourly time intervals; and*
  - f. Ascertaining the ability of Utilities to respond to anonymized CEUD requests at varying time-scales.*

## **II. RESPONSE TO COMMISSION QUESTIONS**

Responses to the questions issued in the Notice are provided below.

- 1. What specific use-cases for anonymized CEUD could be used by the Commission to continue to incrementally apply the Standards while maintaining the balance between customer privacy and CEUD access?**

To date, the Company has not been able to identify additional use cases for anonymized CEUD that maintain a proven balance between customer privacy and CEUD access. The Company is looking for but has not found independent, research-based analysis to support anonymization standards that provide an objective basis for assessing the risk of re-identification of customer data for a given scope and time interval. As a result, the Company does not recommend additional use cases be added at this time.

**2. What modifications, if any, should be made to the anonymized data access contract requirements set by ODAS section III.B.(2)(v)?**

We ask the Commission to reconsider its current approved data anonymization practices in the ODAS or, at least, not to expand the use of data anonymization practices until such time as an objective basis for assessing the risk of re-identification of customer data for a given scope and time interval.

If the Commission chooses to retain its current data anonymization practices, we recommend one change to the existing contract requirements regarding data retention. To specifically address the concern that anonymized data released to the public can never be strengthened, only weakened, we believe the ODAS should limit the duration a third party requester may retain anonymized CEUD. It is reasonable and prudent to add a requirement that a third party delete the data once it is no longer required, or after a certain time period, so that the data does not remain accessible after its initially intended purpose is accomplished. We recommend adding requirement F. to Section III:

F. A third party that has received aggregated or anonymized customer CEUD shall delete the data once it is no longer required or 12 months after received (whichever is sooner).

**3. What modifications, if any, should be made to the shortest allowable time interval for anonymized data set by ODAS section IV.A.?**

**a. Are utilities currently able to produce anonymized data sets using hour-long time intervals?**

Xcel Energy has the capability to produce anonymized CEUD data sets at one-hour time intervals using data from customers that have interval meters. Nevertheless, we do not support releasing anonymized CEUD at this time interval because, again, we do not have an objective basis for assessing the risk of re-identification of the data for a given scope or time interval.

For further consideration, as the Company transitions customers to smart meters with a planned completion date by the end of 2025, customers who have opted out of smart meters will alter the outcome of hourly data, providing an incomplete data set. We have estimated the opt-out rate to be 0.50 percent. At this time, customer opt-out rates are consistent with that estimate.

- 4. What considerations should the Commission make regarding the application of the 15/15 anonymization screen to the shortest allowable time interval (currently one-hour intervals)?**
  - a. Does each interval of time need to pass the 15/15 anonymization screen?**

For the reasons given above, the Company does not support changing to a smaller than 15/15 anonymization screen for the shortest allowable time interval. However, no matter the time interval, the Company would prefer maximizing potential anonymity of each time interval by requiring that each interval pass the 15/15 anonymization screen.

- 5. Given the new customer exemptions added to the Standards at section III.E. by the Commission's August 1, 2023 Order, is it necessary for the Commission to continue to maintain its previous policy of exempting large commercial and industrial customers with peak demands of 5 MW or more from aggregated building-level and anonymized CEUD datasets?**
  - a. If so, what is the appropriate threshold for limiting the application of the Standards to commercial and industrial natural gas and electric customers for anonymized CEUD requests?**

The Company looks forward to hearing from other parties on this issue; we do not currently have a position.

- 6. Should the Commission consider making any technical corrections to the Standards?**

In addition to the concerns expressed above, the Company recommends a change to the "unique customer identifier" language in the ODAS. Section III.B.2.(ii) requires: *A unique customer identification code shall be assigned to each anonymous customer in a data set. The customer identification code shall remain consistent within the data set.* Our concerns include, for example, that if a high-usage customer's unique identification code is provided in one data set and then removed for some reason from another data set, that that customer could then be identified based on previously provided or other publicly available data.

We recommend the following addition to clarify that "unique customer identifier" will not be carried to other data sets. *A unique customer identification code shall be assigned to each anonymous customer in a data set. The customer identification code shall remain consistent within the*

*data set and shall not be used in other data sets.*

## **7. Are there other issues or concerns related to this matter?**

As discussed above, the Commission has broadly defined PII and declared that a utility should refrain from disclosing CEUD without the customer's consent unless the customer's anonymity was adequately protected<sup>8</sup>.

Xcel Energy takes its obligation to protect customer privacy seriously and understands from the Commission's previous orders its expectation that utilities adhere to strict privacy practices. As such, the Company has internalized these expectations, which are now reflected in Company policies, procedures, and employee trainings. Setting anonymized CEUD data standards without an objective basis established for assessing the risk of re-identification of customer data for a given scope or time interval appears to run counter to these expectations, and the Company does not support a change in policy that could result in diminished customer privacy.

If the Commission decides to require utilities to release anonymized data, we request guidance on how the Commission's definition of PII coincides with state breach notification laws. PII is currently defined by the Commission as:

customer data which can be used to distinguish or trace the identity of an individual (e.g., name, social security number, biometric records, etc.) alone, or when combined with other personal or identifying information which is linked or linkable to a specific individual (e.g., date and place of birth, mother's maiden name, etc.). (Source: NIST's Security and Privacy Controls for Federal Information Systems and Organizations; 800-53; April 2013).<sup>9</sup>

In comparison, Minnesota's state breach notification statute governs the release of:

an individual's first name or first initial and last name in combination with any one or more of the following data elements, when the data element is not secured by encryption or another method of technology that makes electronic data unreadable or unusable, or was secured and the encryption key, password, or other means necessary for reading or using the data was also acquired: (1) Social Security number; (2) driver's license number or

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<sup>8</sup> In the Matter of a Commission Inquiry into Privacy Policies of Rate-Regulated Energy Utilities; Order Governing Disclosure of Customer Energy Use Data to Third Parties, Requiring Filing of Privacy Policies and Cost Data, and Soliciting Comment, Docket No E,G999/CI-12-1344, January 19, 2017; Order Point 2.

<sup>9</sup> Docket No. E, G-999/CI-12-1344, Order Denying Petition For Reconsideration And Granting Reconsideration For Limited Purpose Of Clarifying And Modifying Language, September 9, 2014.



Minnesota identification card number; or (3) account number or credit or debit card number, in combination with any required security code, access code, or password that would permit access to an individual's financial account.<sup>10</sup>

The combination of these definitions leads to a broad, largely undefined scope of customer data, which would appear to make it difficult to assess the risk of whether anonymization will result in re-identification.

## **CONCLUSION**

Xcel Energy appreciates the opportunity to provide comments and to help shape how Minnesota utilities manage anonymized data to third parties in their data privacy practices. Even after over a decade of discussing methods to expand access to data while protecting customer CEUD, we are unable to identify an objective basis for assessing the risk of re-identification of anonymized customer data. As a result, we continue to support the discretion currently given to utilities to determine whether to share anonymized data, and we continue to support further development of the record, including continuing to seek expert analysis to help guide the path forward.

Dated: February 16, 2024

Northern States Power Company

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<sup>10</sup> Minn. Stat. § 325E.61(e)

## CERTIFICATE OF SERVICE

I, Marie Horner, hereby certify that I have this day served copies of the foregoing document on the attached lists 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.        E,G999/CI-12-1344**  
**E,G999/M-19-505**

Dated this 16th day of February 2024

/s/

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Marie Horner  
Regulatory Administrator

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Jon	Braman	jbraman@brightpower.com	Bright Power, Inc.	11 Hanover Square, 21st floor  New York, NY 10005	Electronic Service	No	OFF_SL_19-505_Official
Sheri	Brezinka	sbrezinka@usgbc.org	USGBC-Minnesota Chapter	701 Washington Ave. N Suite 200 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_19-505_Official
Richard	Carter	rick.carter@lhbcorp.com	LHB	2780 Shadywood Rd  Excelsior, MN 55331-9599	Electronic Service	No	OFF_SL_19-505_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Gabriel	Chan	gabechan@umn.edu	University of Minnesota	130 Hubert H. Humphrey Center 301 19th Ave S Minneapolis, MN 55455	Electronic Service	No	OFF_SL_19-505_Official
Brent	Christensen	brentc@mnta.org	Minnesota Telecom Alliance	1000 Westgate Drive, Ste 252  St. Paul, MN 55114	Electronic Service	No	OFF_SL_19-505_Official
Andrew	Clearwater	N/A	Future of Privacy Forum	1400 I St NW Ste 450  Washington, DC 20005-6503	Paper Service	No	OFF_SL_19-505_Official
Roger	Colton	roger@fsconline.com	Fisher, Sheehan and Colton	34 Warwick Road  Belmont, MA 02478	Electronic Service	No	OFF_SL_19-505_Official
Sheri	Comer	Sheri.comer@ftr.com	Frontier Communications Corporation	1500 MacCorkle Ave SE  Charleston, WV 25396	Electronic Service	No	OFF_SL_19-505_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_19-505_Official
Stacy	Dahl	sdahl@minnkota.com	Minnkota Power Cooperative, Inc.	5301 32nd Ave S  Grand Forks, ND 58201	Electronic Service	No	OFF_SL_19-505_Official
Steve	Downer	sdowner@mmua.org	MMUA	3025 Harbor Ln N Ste 400  Plymouth, MN 554475142	Electronic Service	No	OFF_SL_19-505_Official
Trent	Fellers	Trent.Fellers@windstream.com	Windstream	1440 M St  Lincoln, NE 68508	Electronic Service	No	OFF_SL_19-505_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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_19-505_Official
Anna	Giesting	giest002@umn.edu	University of Minnesota	N/A	Electronic Service	No	OFF_SL_19-505_Official
Jenny	Glumack	jenny@mrea.org	Minnesota Rural Electric Association	11640 73rd Ave N  Maple Grove, MN 55369	Electronic Service	No	OFF_SL_19-505_Official
Bill	Gullickson	wdgv76@yahoo.com		1819 Colfax Avenue S  Minneapolis, MN 55403	Electronic Service	No	OFF_SL_19-505_Official
Katherine	Hamilton	katherine@aem-alliance.org	Advanced Energy Management Alliance	1701 Rhode Island Ave, NW  Washington, DC 20036	Electronic Service	No	OFF_SL_19-505_Official
Elise	Harrington, PhD	eliseh@umn.edu	University of Minnesota	N/A	Electronic Service	No	OFF_SL_19-505_Official
Adam	Heinen	aheinen@dakotaelectric.com	Dakota Electric Association	4300 220th St W  Farmington, MN 55024	Electronic Service	No	OFF_SL_19-505_Official
Luke	Hollenkamp	luke.hollenkamp@ci.minneapolis.mn.us	City of Minneapolis	350 S. Fifth St. Room 301M Minneapolis, MN 55415	Electronic Service	No	OFF_SL_19-505_Official
Caroline	Horton	chorton@aeonmn.org	Aeon	901 N 3rd St Ste 150  Minneapolis, MN 55401	Electronic Service	No	OFF_SL_19-505_Official
Craig	Johnson	cjohnson@lmc.org	League of Minnesota Cities	145 University Ave. W.  Saint Paul, MN 55103-2044	Electronic Service	No	OFF_SL_19-505_Official
Sarah	Komorosi	lacro041@umn.edu	University of Minnesota	N/A	Electronic Service	No	OFF_SL_19-505_Official
Nicolle	Kupser	nkupser@greatermngas.com	Greater Minnesota Gas, Inc. & Greater MN Transmission, LLC	1900 Cardinal Ln PO Box 798 Faribault, MN 55021	Electronic Service	No	OFF_SL_19-505_Official

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Cheri	Lenzmeier	cheril@mvec.net	Minnesota Valley Electric Cooperative	125 Minnesota Valley Electric Dr  Jordan, MN 55352	Electronic Service	No	OFF_SL_19-505_Official
Annie	Levenson Falk	annielf@cubminnesota.org	Citizens Utility Board of Minnesota	332 Minnesota Street, Suite W1360  St. Paul, MN 55101	Electronic Service	No	OFF_SL_19-505_Official
Todd	Liljenquist	todd.liljenquist@mmha.com	Minnesota Multi Housing Association (MHA)	1600 West 82nd Street, Suite 110  Minneapolis, MN 55431	Electronic Service	No	OFF_SL_19-505_Official
Jason	Loos	jason.loos@centerpointenergy.com	CenterPoint Energy Resources Corp.	505 Nicollet Mall 3rd Floor Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-505_Official
Sarah	Marquardt	smarquardt@mcknight.org	The McKnight Foundation	710 S 2nd St  Minneapolis, MN 55401	Electronic Service	No	OFF_SL_19-505_Official
Gregg	Mast	gmast@cleanenergyeconomy.mn.org	Clean Energy Economy Minnesota	4808 10th Avenue S  Minneapolis, MN 55417	Electronic Service	No	OFF_SL_19-505_Official
J.B.	Matthews	N/A	Cushman & Wakefield/NorthMarq	3500 American Blvd W - #200  Minneapolis, MN 55431	Paper Service	No	OFF_SL_19-505_Official
Craig	McDonnell	Craig.McDonnell@state.mn.us	MN Pollution Control Agency	520 Lafayette Road  St. Paul, MN 55101	Electronic Service	No	OFF_SL_19-505_Official
David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St  Duluth, MN 558022093	Electronic Service	No	OFF_SL_19-505_Official

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Andrew	Moratzka	andrew.moratzka@stoel.com	Steel Rives LLP	33 South Sixth St Ste 4200  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-505_Official
Ted	Nedwick	tnedwick@nhtinc.org	National Housing Trust	1101 30th Street NW Ste 100A  Washington, DC 20007	Electronic Service	No	OFF_SL_19-505_Official
Samantha	Norris	samanthanorris@alliantenergy.com	Interstate Power and Light Company	200 1st Street SE PO Box 351  Cedar Rapids, IA 524060351	Electronic Service	No	OFF_SL_19-505_Official
Greg	Palmer	gpalmer@greatermngas.com	Greater Minnesota Gas, Inc. & Greater MN Transmission, LLC	1900 Cardinal Ln PO Box 798 Faribault, MN 55021	Electronic Service	No	OFF_SL_19-505_Official
Audrey	Partridge	apartridge@mncee.org	Center for Energy and Environment	212 3rd Ave. N. Suite 560  Minneapolis, MN 55401	Electronic Service	No	OFF_SL_19-505_Official
Ben	Rabe	rabe@fresh-energy.org	Fresh Energy	408 St Peter St Ste 220 St. Paul, MN 55102	Electronic Service	No	OFF_SL_19-505_Official
Phyllis	Reha	phyllisreha@gmail.com		3656 Woodland Trail  Eagan, MN 55123	Electronic Service	No	OFF_SL_19-505_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_19-505_Official
Christine	Schwartz	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7  Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_19-505_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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_19-505_Official
Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates	7400 Lyndale Ave S Ste 190  Richfield, MN 55423	Electronic Service	No	OFF_SL_19-505_Official
Brendon	Slotterback	bslotterback@mcknight.org	The McKnight Foundation	710 S 2nd St  Minneapolis, MN 55401	Electronic Service	No	OFF_SL_19-505_Official
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Richard	Stasik	richard.stasik@wecenergygroup.com	Minnesota Energy Resources Corporation (HOLDING)	231 West Michigan St - P321  Milwaukee, WI 53203	Electronic Service	No	OFF_SL_19-505_Official
Kristin	Stastny	kstastny@taftlaw.com	Taft Stettinius & Hollister LLP	2200 IDS Center 80 South 8th St Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-505_Official
Cary	Stephenson	cStephenson@otpc.com	Otter Tail Power Company	215 South Cascade Street  Fergus Falls, MN 56537	Electronic Service	No	OFF_SL_19-505_Official
Caitlin	Straabe	caitlin.straabe@mdu.com	Great Plains Natural Gas Co.	400 N 4th St  Bismarck, ND 58501	Electronic Service	No	OFF_SL_19-505_Official
Jason	Topp	jason.topp@lumen.com	CenturyLink Communications, LLC	200 S 5th St Ste 2200  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-505_Official

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Jenna	Warmuth	jwarmuth@mnpower.com	Minnesota Power	30 W Superior St  Duluth, MN 55802-2093	Electronic Service	No	OFF_SL_19-505_Official
Patricia	Whitney	patricia@pwhitneylaw.com	St. Paul Assn of Responsible Landlords	627 Snelling Avenue South  St. Paul, MN 55116	Electronic Service	No	OFF_SL_19-505_Official
Robyn	Woeste	robynwoeste@alliantenergy.com	Interstate Power and Light Company	200 First St SE  Cedar Rapids, IA 52401	Electronic Service	No	OFF_SL_19-505_Official
Jeff	Zethmayr	jzethmayr@citizensutilityboard.org	Citizens Utility Board	309 W. Washington, Ste 800  Chicago, IL 60606	Electronic Service	No	OFF_SL_19-505_Official