



October 17, 2025

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

RE: Center for Energy and Environment’s Supplemental Comments in the Matter of a Peak Time Rebate Program for Northern States Power Co. d/b/a Xcel Energy to Further the Commission’s Advanced Rate Design Efforts in Docket No. E002/CI-24-115

Docket No. E002/M-24-432

Dear Ms. Bergman,

Center for Energy and Environment (“CEE”) respectfully submits these supplemental comments to the Minnesota Public Utilities Commission (“Commission”) in response to the Notice of Comment Period filed July 17, 2025.

CEE appreciates the comments submitted by other parties and the ongoing conversation in the record regarding Xcel Energy (“Xcel”)’s proposed Peak Time Rebate (“PTR”) program. Although CEE did not submit initial or reply comments in this record, CEE has engaged with several parties throughout the comment periods and submits the following supplemental comments focused on the generation capacity benefits of the proposed program. CEE summarizes some of the concerns raised by other parties regarding how the generation capacity benefits of the proposed program will be realized and offers several considerations.

To CEE’s understanding, Xcel Energy bids most of the demand response programs in its ECO portfolio into the Midcontinent Independent System Operator (“MISO”) capacity market as accredited resources.¹ MISO recognizes these programs as supply-side resources that allow Xcel to avoid building additional capacity, resulting in generation capacity cost savings for the utility and its ratepayers. These generation capacity benefits are typically the primary benefit derived

¹ Xcel reported 1,011 MW of accredited summer demand response in 2024 (Xcel Initial Filing, February 1, 2024. Chapter 3, Page 16, Docket E002/RP-24-67), which makes up much of the 1,251.2 MW of controllable load produced by their 2024 demand response offerings, most of which have been incorporated in ECO (Xcel Compliance Filing, January 1, 2025. Attachment A, Page 1, Docket E-002/M-20-421).

from demand response programs included in utilities' Energy Conservation and Optimization (ECO) portfolios. In 2024, generation capacity benefits accounted for 98 percent of the benefits generated by Xcel's ECO demand response segment.² Xcel approximates that 97 percent of anticipated benefits from the proposed Peak Time Rebate (PTR) program will come from generation capacity benefits.³

In initial comments, Xcel stated that they followed the Department's ECO Cost-Effectiveness Guidance when conducting the PTR cost-effectiveness analysis because Xcel proposed the program be included in their ECO portfolio.⁴ As explained in the Department's initial comments, the ECO Cost-Effectiveness Guidance for the 2024-2026 Triennial directs utilities to calculate generation capacity benefits using the MISO Cost of New Entry (CONE) value for 2023-2024, or \$104.17/kw-year.⁵ This methodology is recommended for all programs filed under ECO.

However, Xcel's PTR proposal is unique compared to most other demand response programs filed under ECO because Xcel does not currently plan to bid the program into the MISO capacity market as an accredited resource. Xcel believes the PTR program is not well suited for the capacity market at this time due to its voluntary participation, potential for inconsistent customer behavior, limited impact, and measurement challenges.⁶ Xcel outlines clear concerns about the program's reliability and the risk of penalty if the program is bid into MISO but fails to deliver when called upon. Xcel clarifies that its existing behavioral demand response program, Energy Action Days, is not currently bid into MISO for similar reasons. Additionally, Xcel mentions upcoming adjustments to MISO's demand response resource requirements that will make behavioral demand response less conducive to the MISO market.⁷

As such, Xcel does not plan to realize the capacity benefits of the PTR program by bidding the program into MISO's capacity market, at least in the short-term, a decision that CEE views as reasonable. However, as highlighted in the Department's initial comments, "MISO rules appear to preclude using load reductions from demand-side resources (other than energy efficiency) to reduce load serving entities' load forecasts," meaning Xcel cannot use the capacity from the PTR program to reduce their capacity requirement to MISO.⁸ In their initial comments, Fresh Energy asked Xcel to further explain how they will realize the capacity benefits of the proposed

² Xcel 2024 ECO Status Report, April 1, 2025. Docket Number E002/CIP-23-92. Page 178.

³ Xcel Reply Comments, October 3, 2025. Docket Number E002/M-24-432. Attachment A.

⁴ Xcel Initial Comments, September 5, 2025. Docket Number E002/M-24-432. Page 6.

⁵ Department Initial Comments, September 5, 2025. Docket Number E002/M-24-432.

⁶ Xcel Initial Comments, September 5, 2025. Docket Number E002/M-24-432. Page 8.

⁷ *Id.* Page 8.

⁸ Department Initial Comments, September 5, 2025. Docket Number E002/M-24-432.

program if they do not plan to use the PTR program as a MISO-accredited capacity resource but are also not permitted to use it to lower their load forecast.⁹

In response, Xcel clarified they will include the PTR program in their IRP planning process and explained that, in Xcel's last IRP, both MISO-registered and unregistered demand response programs were bundled together to offset the need for other supply-side resources.¹⁰ Specifically, Demand Response Bundle 2 in Xcel's latest IRP included capacity from the Energy Action Days program alongside other demand response programs as part of the Company's existing demand response portfolio. Xcel claims that "the capacity from the selected demand response bundles offsets the need for other resources that might have been selected by the model. By including the impacts of DR, the Company is affecting the need to build new capacity resources and as such is realizing the benefits of a behavioral DR program for our customers."¹¹

CEE appreciates Xcel's response but requests additional clarification. It is unclear to CEE whether the capacity produced by the behavioral demand response program in Bundle 2 is included in the total MW value of the bundle, since the behavioral demand response program is still unaccredited by MISO.¹² If the behavioral program does not contribute to the total capacity of the bundle and the entirety of the bundle's capacity comes from its accredited resources, it remains unclear how the behavioral program is offsetting the need for new capacity resources.

Alternatively, if the unaccredited capacity from the behavioral demand response program is included in the total MW value of the bundle, CEE requests clarification as to whether it is valued equally to the MISO-accredited capacity in the same bundle.

Given that most of the proposed PTR program's benefit comes from avoided capacity, it is important to clearly establish how the avoided capacity benefit materializes for a demand response program that, due to MISO rules, cannot be used to lower the Planning Reserve Margin Requirement ("PRMR") on the demand side and, as proposed, will not be used to meet the PRMR on the supply side using the typical method of bidding the program into MISO.

To establish a more transparent process going forward, the Commission could require unaccredited demand response programs to be bundled separately from accredited demand response programs in future IRP modeling. This approach would more clearly delineate the roles of accredited and unaccredited demand response in offsetting the need for additional capacity and provide greater clarity on how behavioral demand response programs contribute to Xcel's capacity requirement.

⁹ Fresh Energy Initial Comments, September 5, 2025. Docket Number E002/M-24-432. Page 5.

¹⁰ Xcel Reply Comments, October 3, 2025. Docket Number E002/M-24-432. Page 9.

¹¹ *Id.* Page 9.

CEE also recognizes that energy adequacy and limiting imports from MISO are fundamental parts of the resource planning process and that behavioral demand response with no accredited value could still be used to improve the energy adequacy of a portfolio, potentially offsetting capacity costs. If the PTR program is approved, this may be an area worth exploring as an additional or alternative means of offsetting capacity costs.

Finally, to the extent the Commission or parties are interested in how capacity benefits are calculated in ECO, CEE recommends coordination with the ECO Cost-Effectiveness Advisory Committee. CEE recognizes that the committee is nearing the end of its stakeholder process for the 2027-2029 Triennial but notes that utilities can propose custom methods for calculating cost-effectiveness.

We appreciate the Commission's consideration of our comments. Please contact me at myatsuhashi@mncee.org with any questions.

Sincerely,

/s/ Mariko Yatsunami
Regulatory Policy Advocate
Center for Energy and Environment

/s/ Will Nissen
Director of Policy
Center for Energy and Environment

AFFIDAVIT OF SERVICE

DOCKET NUMBER E002/M-24-432

I, Mariko Yatsunami, hereby certify that on this 17th day of October 2025, I served *Center for Energy and Environment's Supplemental Comments in the Matter of a Peak Time Rebate Program for Northern States Power Co. d/b/a Xcel Energy to Further the Commission's Advanced Rate Design Efforts in Docket No. E002/CI-24-115* in Docket Number E002/M-24-432 on the following persons on the attached Service Lists by:

X placing such filing in envelopes, properly addressed, and depositing the same in the Post Office at the City of Minneapolis, for delivery by the United States Post Office as directed by said envelopes.

X electronic filing

/s/ Mariko Yatsunami

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105	Sandra	Henry	sandra.henry@elevatenp.org	Elevate		322 S Green St Ste 300 Chicago IL, 60607 United States	Electronic Service		No	Official 24-432
106	Katherine	Hinderlie	katherine.hinderlie@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	445 Minnesota St Suite 1400 St. Paul MN, 55101-2134 United States	Electronic Service		Yes	Official 24-432
107	Corey	Hintz	chintz@dakotaelectric.com	Dakota Electric Association		4300 220th Street	Electronic Service		No	Official 24-432

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						Farmington MN, 55024- 9583 United States				
108	Joe	Hoffman	ja.hoffman@smmpa.org	SMMPA		500 First Ave SW Rochester MN, 55902- 3303 United States	Electronic Service		No	Official 24-432
109	Michael	Hoppe	lu23@ibew23.org	Local Union 23, I.B.E.W.		445 Etna Street Ste. 61 St. Paul MN, 55106 United States	Electronic Service		No	Official 24-432
110	MJ	Horner	mj.horner@xcelenergy.com			null null, null United States	Electronic Service		No	Official 24-432
111	Samantha	Houston	shouston@ucsusa.org	Union of Concerned Scientists		1825 K St. NW Ste 800 Washington DC, 20006 United States	Electronic Service		No	Official 24-432
112	Lori	Hoyum	lhoyum@mnpower.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	Official 24-432
113	Jan	Hubbard	jan.hubbard@comcast.net			7730 Mississippi Lane Brooklyn Park MN, 55444 United States	Electronic Service		No	Official 24-432
114	Holmes	Hummel	holmes,hummel@cleanenergyworks.org	Clean Energy Works		925 French St NW Washington DC, 20001 United States	Electronic Service		No	Official 24-432
115	Casey	Jacobson	cjacobson@bepc.com	Basin Electric Power Cooperative		1717 East Interstate Avenue Bismarck ND, 58501 United States	Electronic Service		No	Official 24-432
116	Travis	Jacobson	travis.jacobson@mdu.com	Great Plains Natural Gas Company		400 N 4th St Bismarck ND, 58501 United States	Electronic Service		No	Official 24-432
117	John S.	Jaffray	jjaffray@jrpowers.com	JJR Power		350 Highway 7 Suite 236 Excelsior MN, 55331 United States	Electronic Service		No	Official 24-432
118	Alan	Jenkins	aj@jenkinsatlaw.com	Jenkins at Law		2950 Yellowtail Ave. Marathon FL, 33050 United States	Electronic Service		No	Official 24-432
119	Andrea	Jenkins	andrea.jenkins@minneapolismn.gov	Minneapolis City of Lakes		350 S 5th St Room 307 Minneapolis MN, 55415 United States	Electronic Service		No	Official 24-432
120	Richard	Johnson	rick.johnson@lawmoss.com	Moss & Barnett		150 S. 5th Street Suite 1200 Minneapolis MN, 55402 United States	Electronic Service		No	Official 24-432
121	Sarah	Johnson Phillips	sjphillips@stoel.com	Stoel Rives LLP		33 South Sixth Street Suite 4200 Minneapolis	Electronic Service		No	Official 24-432

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						MN, 55402 United States				
122	Nate	Jones	njones@hcpd.com	Heartland Consumers Power		PO Box 248 Madison SD, 57042 United States	Electronic Service		No	Official 24-432
123	Philip	Jones	phil@philjonesconsulting.com	Alliance for Transportation Electrification		1402 3rd Ave Ste 1315 Seattle WA, 98101 United States	Electronic Service		No	Official 24-432
124	Brendan	Jordan	bjordan@gpisd.net	Great Plains Institute & Bioeconomy Coalition of MN		2801 21st Ave S Ste 220 Minneapolis MN, 55407 United States	Electronic Service		No	Official 24-432
125	Bina	Joshi	bina.joshi@afslaw.com	ArentFox Schiff LLP		233 S Wacker Dr Ste 7100 Chicago IL, 60606 United States	Electronic Service		No	Official 24-432
126	Dan	Juhl	in.another.account.info@juhlenergy.com	Juhl Energy Inc.		1502 17th St SE Pipestone MN, 56164 United States	Paper Service		No	Official 24-432
127	Mahmoud	Kabalan	mahmoud.kabalan@stthomas.edu	University of St Thomas		2115 Summit Ave. Mail OSS100 School of Engineering Saint Paul MN, 55105 United States	Electronic Service		No	Official 24-432
128	Michael	Kampmeyer	mkampmeyer@a-e-group.com	AEG Group, LLC		260 Salem Church Road Sunfish Lake MN, 55118 United States	Electronic Service		No	Official 24-432
129	Nick	Kaneski	nick.kaneski@enbridge.com	Enbridge Energy Company, Inc.		11 East Superior St Ste 125 Duluth MN, 55802 United States	Electronic Service		No	Official 24-432
130	Stacey	Karels	skarels@local563.org	Mankato Area Bldg & Construction Trades Council		310 McKinzie St Mankato MN, 56001 United States	Electronic Service		No	Official 24-432
131	William	Kenworthy	will@votesolar.org			1 South Dearborn St Ste 2000 Chicago IL, 60603 United States	Electronic Service		No	Official 24-432
132	Samuel B.	Ketchum	sketchum@kennedy-graven.com	Kennedy & Graven, Chartered		150 S 5th St Ste 700 Minneapolis MN, 55402 United States	Electronic Service		No	Official 24-432
133	Chris	King	chris_king@siemens.com	Siemens		4000 E. Third Ave Suite 400 Foster City CA, 94404 United States	Electronic Service		No	Official 24-432
134	Frank	Kohlasch	frank.kohlasch@state.mn.us		Minnesota Pollution Control Agency	520 Lafayette Rd N. St. Paul MN, 55155 United States	Electronic Service		No	Official 24-432
135	Brian	Krambeer	bkrambeer@mienergy.coop	MiEnergy Cooperative		PO Box 626 31110 Cooperative	Electronic Service		No	Official 24-432

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						Way Rushford MN, 55971 United States				
136	Michael	Krause	michaelkrause61@yahoo.com			1200 Plymouth Avenue Minneapolis MN, 55411 United States	Electronic Service		No	Official 24-432
137	Michael	Krikava	mkrikava@taftlaw.com	Taft Stettinius & Hollister LLP		2200 IDS Center 80 S 8th St Minneapolis MN, 55402 United States	Electronic Service		No	Official 24-432
138	Nicolle	Kupser	nkupser@greatermngas.com	Greater Minnesota Gas, Inc.		1900 Cardinal Ln PO Box 798 Faribault MN, 55021 United States	Electronic Service		No	Official 24-432
139	Matthew	Lacey	mlacey@greenergy.com	Great River Energy		12300 Elm Creek Boulevard Maple Grove MN, 55369- 4718 United States	Electronic Service		No	Official 24-432
140	Mary	LaGarde	mlagarde@maicnet.org	Minneapolis American Indian Center		1530 E Franklin Ave Minneapolis MN, 55404 United States	Electronic Service		No	Official 24-432
141	Holly	Lahd	holly.lahd@target.com	Target Corporation		33 South 6th St CC-28662 Minneapolis MN, 55402 United States	Electronic Service		No	Official 24-432
142	Carmel	Laney	carmel.laney@stoel.com	Stoel Rives LLP		33 South Sixth Street Suite 4200 Minneapolis MN, 55402 United States	Electronic Service		No	Official 24-432
143	James D.	Larson	james.larson@avantenergy.com	Avant Energy Services		220 S 6th St Ste 1300 Minneapolis MN, 55402 United States	Electronic Service		No	Official 24-432
144	Peder	Larson	plarson@larkinhoffman.com	Larkin Hoffman Daly & Lindgren, Ltd.		8300 Norman Center Drive Suite 1000 Bloomington MN, 55437 United States	Electronic Service		No	Official 24-432
145	Kevin	Lee	klee@bluegreenalliance.org	BlueGreen Alliance		2701 University Ave SE Ste. 209 Minneapolis MN, 55414 United States	Electronic Service		No	Official 24-432
146	Dean	Leischow	dean@sunrisenrg.com	Sunrise Energy Ventures		315 Manitoba Ave Ste 200 Wayzata MN, 55391 United States	Electronic Service		No	Official 24-432
147	Annie	Levenson Falk	annielf@cubminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota Street, Suite W1360 St. Paul MN, 55101 United States	Electronic Service		No	Official 24-432

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
148	Ryan	Long	ryan.j.long@xcelenergy.com			414 Nicollet Mall 401 8th Floor Minneapolis MN, 55401 United States	Electronic Service		No	Official 24-432
149	Jason	Loos	jason.loos@centerpointenergy.com	CenterPoint Energy Resources Corp.		505 Nicollet Mall 3rd Floor Minneapolis MN, 55402 United States	Electronic Service		No	Official 24-432
150	Susan	Ludwig	sludwig@mnpower.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	Official 24-432
151	Alice	Madden	alice@communitypowermn.org	Community Power		2720 E 22nd St Minneapolis MN, 55406 United States	Electronic Service		No	Official 24-432
152	Kavita	Maini	kmairi@wi.rr.com	KM Energy Consulting, LLC		961 N Lost Woods Rd Oconomowoc WI, 53066 United States	Electronic Service		No	Official 24-432
153	Christine	Marquis	regulatory.records@xcelenergy.com	Xcel Energy		414 Nicollet Mall MN1180-07-MCA Minneapolis MN, 55401 United States	Electronic Service		No	Official 24-432
154	Emily	Marshall	emarshall@tourismarshall.com	Miller O'Brien Jensen, PA		120 S. 6th Street Suite 2400 Minneapolis MN, 55402 United States	Electronic Service		No	Official 24-432
155	Katherine	Marshall	katie.marshall@lawmoss.com	Moss & Barnett		150 S 5th St Ste 1200 Minneapolis MN, 55402 United States	Electronic Service		No	Official 24-432
156	Mary	Martinka	mary.a.martinka@xcelenergy.com	Xcel Energy Inc		414 Nicollet Mall 7th Floor Minneapolis MN, 55401 United States	Electronic Service		No	Official 24-432
157	Gregg	Mast	gmast@cleanenergyeconomymn.org	Clean Energy Economy Minnesota		4808 10th Avenue S Minneapolis MN, 55417 United States	Electronic Service		No	Official 24-432
158	Daryl	Maxwell	dmaxwell@hydro.mb.ca	Manitoba Hydro		360 Portage Ave FL 16 PO Box 815, Station Main Winnipeg MB, R3C 2P4 Canada	Electronic Service		No	Official 24-432
159	Erica	McConnell	emcconnell@elpc.org	Environmental Law & Policy Center		35 E. Wacker Drive, Suite 1600 Chicago IL, 60601 United States	Electronic Service		No	Official 24-432
160	Lilly B.	McKenna	lilly.mckenna@stoel.com	Stoel Rives LLP		One Montgomery St Ste 3230 San Francisco CA, 94104 United States	Electronic Service		No	Official 24-432

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
161	Taylor	McNair	taylor@gridlab.org			668 Capp Street San Francisco CA, 94110 United States	Electronic Service		No	Official 24-432
162	Sally Anne	McShane	sally.anne.mcshane@state.mn.us		Public Utilities Commission	121 7th Place E Suite 350 St. Paul MN, 55101 United States	Electronic Service		Yes	Official 24-432
163	Stephen	Melchionne	stephen_melchionne@ag.state.mn.us		Office of the Attorney General - Department of Commerce	445 Minnesota Street, Ste. 1400 St. Paul MN, 55101 United States	Electronic Service		Yes	Official 24-432
164	Thomas	Melone	thomas.melone@allcous.com	Minnesota Go Solar LLC		222 South 9th Street Suite 1600 Minneapolis MN, 55120 United States	Electronic Service		No	Official 24-432
165	Greg	Merz	greg.merz@ag.state.mn.us		Office of the Attorney General - Department of Commerce	445 Minnesota Street Suite 1400 St. Paul MN, 55101 United States	Electronic Service		Yes	Official 24-432
166	Peder	Mewis	pmewis@cleangridalliance.org	Clean Grid Alliance		570 Asbury St. St. Paul MN, 55104 United States	Electronic Service		No	Official 24-432
167	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		Yes	Official 24-432
168	Kevin	Miller	kevin.miller@chargepoint.com			254 E. Hacienda Avenue Campbell CA, 95008 United States	Electronic Service		No	Official 24-432
169	Stacy	Miller	stacy.miller@minneapolismn.gov	City of Minneapolis		350 S. 5th Street Room M 301 Minneapolis MN, 55415 United States	Electronic Service		No	Official 24-432
170	David	Moeller	dmoeller@allete.com	Minnesota Power			Electronic Service		No	Official 24-432
171	Marc	Monbouquette	marc.monbouquette@enel.com	Enel X North America, Inc.		846 Bransten Rd San Carlos CA, 94070 United States	Electronic Service		No	Official 24-432
172	Dalene	Monsebroten	dalene.monsebroten@nmpagency.com	Northern Municipal Power Agency		123 2nd St W Thief River Falls MN, 56701 United States	Electronic Service		No	Official 24-432
173	Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP		33 South Sixth St Ste 4200 Minneapolis MN, 55402 United States	Electronic Service		No	Official 24-432

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
174	Christa	Moseng	christa.moseng@state.mn.us		Office of Administrative Hearings	P.O. Box 64620 Saint Paul MN, 55164-0620 United States	Electronic Service		Yes	Official 24-432
175	Evan	Mulholland	emulholland@mncenter.org	Minnesota Center for Environmental Advocacy		1919 University Ave W Ste 515 Saint Paul MN, 55101 United States	Electronic Service		No	Official 24-432
176	Alan	Muller	alan@greendel.org	Energy & Environmental Consulting		1110 West Avenue Red Wing MN, 55066 United States	Electronic Service		No	Official 24-432
177	Kristin	Munsch	kmunsch@citizensutilityboard.org	Citizens Utility Board of Minnesota		309 W. Washington St. Ste. 800 Chicago IL, 60606 United States	Electronic Service		No	Official 24-432
178	Travis	Murray	travis.murray@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	445 Minnesota St Ste 1400 Saint Paul MN, 55101 United States	Electronic Service		Yes	Official 24-432
179	Amanda	Myers	amanda@weavegrid.com	Weave Grid, Inc.		222 7th Street 2nd Floor San Francisco CA, 94103 United States	Electronic Service		No	Official 24-432
180	Mark	Nabong	mnabong@nrdc.org	Natural Resources Defense Council		20 N. Wacker Drive #1600 Chicago IL, 60606 United States	Electronic Service		No	Official 24-432
181	Ben	Nelson	benn@cmpasgroup.org	CMMPA		459 South Grove Street Blue Earth MN, 56013 United States	Electronic Service		No	Official 24-432
182	Carl	Nelson	cnelson@mncee.org	Center for Energy and Environment		212 3rd Ave N Ste 560 Minneapolis MN, 55401 United States	Electronic Service		No	Official 24-432
183	David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency		220 South Sixth Street Suite 1300 Minneapolis MN, 55402 United States	Electronic Service		No	Official 24-432
184	Sephra	Ninow	sephra.ninow@energycenter.org	Center for Sustainable Energy		426 17th Street, Suite 700 Oakland CA, 94612 United States	Electronic Service		No	Official 24-432
185	Michael	Noble	noble@fresh-energy.org	Fresh Energy		408 Saint Peter St Ste 350 Saint Paul MN, 55102 United States	Electronic Service		No	Official 24-432
186	Rolf	Nordstrom	rnordstrom@gpisd.net	Great Plains Institute		2801 21ST AVE S STE 220 Minneapolis MN, 55407-1229 United States	Electronic Service		No	Official 24-432

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
187	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	Official 24-432
188	Christian	Noyce	christian.noyce@state.mn.us		Public Utilities Commission	759 Hague Ave St Paul MN, 55104 United States	Electronic Service		Yes	Official 24-432
189	David	O'Brien	david.obrien@navigant.com	Navigant Consulting		77 South Bedford St Ste 400 Burlington MA, 01803 United States	Electronic Service		No	Official 24-432
190	M. William	O'Brien	bobrien@mojlaw.com	Miller O'Brien Jensen, P.A.		120 S 6th St Ste 2400 Minneapolis MN, 55402 United States	Electronic Service		No	Official 24-432
191	Ric	O'Connell	ric@gridlab.org	GridLab		2120 University Ave Berkeley CA, 94704 United States	Electronic Service		No	Official 24-432
192	Jeff	O'Neill	jeff.oneill@ci.monticello.mn.us	City of Monticello		505 Walnut Street Suite 1 Monticello MN, 55362 United States	Electronic Service		No	Official 24-432
193	Matthew	Olsen	molsen@otpco.com	Otter Tail Power Company		215 South Cascade Street Fergus Falls MN, 56537 United States	Electronic Service		No	Official 24-432
194	Russell	Olson	rolson@hcpd.com	Heartland Consumers Power District		PO Box 248 Madison SD, 57042-0248 United States	Electronic Service		No	Official 24-432
195	Debra	Opatz	dopatz@otpco.com	Otter Tail Power Company		215 South Cascade Street Fergus Falls MN, 56537 United States	Electronic Service		No	Official 24-432
196	Nate	O'Reilly	nate@iron512.com			851 Pierce Butler Route St Paul MN, 55104 United States	Electronic Service		No	Official 24-432
197	Carol A.	Overland	overland@legalelectric.org	Legalelectric - Overland Law Office		1110 West Avenue Red Wing MN, 55066 United States	Electronic Service		No	Official 24-432
198	John	Pacheco	johnpachecojr@gmail.com			null null, null United States	Electronic Service		No	Official 24-432
199	Greg	Palmer	gpalmer@greatermngas.com	Greater Minnesota Gas, Inc.		1900 Cardinal Ln PO Box 798 Faribault MN, 55021 United States	Electronic Service		No	Official 24-432
200	Jessica	Palmer Denig	jessica.palmer-denig@state.mn.us		Office of Administrative Hearings	600 Robert St N PO Box 64620 St. Paul MN, 55164 United States	Electronic Service		Yes	Official 24-432

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
201	Dan	Patry	dpatry@sunedison.com	SunEdison		600 Clipper Drive Belmont CA, 94002 United States	Electronic Service		No	Official 24-432
202	Jeffrey C	Paulson	jeff.jcplaw@comcast.net	Paulson Law Office, Ltd.		4445 W 77th Street Suite 224 Edina MN, 55435 United States	Electronic Service		No	Official 24-432
203	Jose	Perez	jose@hispanicsinenergy.com			1017 L Street #719 Sacramento CA, 95814 United States	Electronic Service		No	Official 24-432
204	Lisa	Perry	lisa.perry@walmart.com			2608 SE J St Bentonville AR, 72716 United States	Electronic Service		No	Official 24-432
205	Jennifer	Peterson	jjpeterson@mnpower.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	Official 24-432
206	Catherine	Phillips	catherine.phillips@wecenergygroup.com	Minnesota Energy Resources		231 West Michigan St Milwaukee WI, 53203 United States	Electronic Service		No	Official 24-432
207	Marcia	Podratz	mpodratz@mnpower.com	Minnesota Power		30 W Superior S Duluth MN, 55802 United States	Electronic Service		No	Official 24-432
208	Hannah	Polikov	hpolikov@aee.net	Advanced Energy Economy Institute		1000 Vermont Ave, Third Floor Washington DC, 20005 United States	Electronic Service		No	Official 24-432
209	J.	Porter	greg.porter@nngco.com	Northern Natural Gas Company		1111 South 103rd St Omaha NE, 68124 United States	Electronic Service		No	Official 24-432
210	Kevin	Pranis	kpranis@liunagroc.com	Laborers' District Council of MN and ND		81 E Little Canada Road St. Paul MN, 55117 United States	Electronic Service		No	Official 24-432
211	David G.	Prazak	dprazak@otpc.com	Otter Tail Power Company		P.O. Box 496 215 South Cascade Street Fergus Falls MN, 56538-0496 United States	Electronic Service		No	Official 24-432
212	Kenneth	Rance	krance@sabathani.org	Sabathani Community Center		310 East 38th St Rm #120 Minneapolis MN, 55409 United States	Electronic Service		No	Official 24-432
213	John C.	Reinhardt		Laura A. Reinhardt		3552 26th Ave S Minneapolis MN, 55406 United States	Paper Service		No	Official 24-432

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
214	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	Official 24-432
215	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	Official 24-432
216	John	Reynolds	john.reynolds@nfib.org			180 5th St E Suite 260 St. Paul MN, 55101 United States	Electronic Service		No	Official 24-432
217	Whitney	Richardson	whitney.richardson@evgo.com	EVgo Services, LLC		11835 W Olympic Blvd Ste 900E Los Angeles CA, 90064 United States	Electronic Service		No	Official 24-432
218	Noah	Roberts	nroberts@cleanpower.org	Energy Storage Association		1155 15th St NW, Ste 500 Washington DC, 20005 United States	Electronic Service		No	Official 24-432
219	Alice	RobertsDavis	admin.info@state.mn.us	Department of Administration		15 Sherburne Avenue St. Paul MN, 55155 United States	Electronic Service		No	Official 24-432
220	Susan	Romans	sromans@allete.com	Minnesota Power		30 West Superior Street Legal Dept Duulth MN, 55802 United States	Electronic Service		No	Official 24-432
221	Amanda	Rome	amanda.rome@xcelenergy.com	Xcel Energy		414 Nicollet Mall FL 5 Minneapolis MN, 55401 United States	Electronic Service		No	Official 24-432
222	Robert K.	Sahr	bsahr@eastriver.coop	East River Electric Power Cooperative		P.O. Box 227 Madison SD, 57042 United States	Electronic Service		No	Official 24-432
223	Renee	Samson	rsamson@freewiretech.com	FreeWire Technologies		1999 Harrison St Oakland CA, 94612 United States	Electronic Service		No	Official 24-432
224	Joseph L	Sathe	jsathe@kennedy-graven.com	Kennedy & Graven, Chartered		150 S 5th St Ste 700 Minneapolis MN, 55402 United States	Electronic Service		No	Official 24-432
225	Tim	Schaefer	thschaef@gmail.com	Environment MN		211 N 1st St Ste 480 Minneapolis MN, 55401 United States	Electronic Service		No	Official 24-432
226	Kevin	Schlangen	kevin.schlangen@co.dakota.mn.us	Dakota County		2800 160th Street West Rosemount MN, 55068 United States	Electronic Service		No	Official 24-432
227	Jacob J.	Schlesinger	jschlesinger@keyesfox.com	Keyes & Fox LLP		1580 Lincoln St Ste 880 Denver CO, 80203 United States	Electronic Service		No	Official 24-432

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
228	Elizabeth	Schmiesing	eschmiesing@winthrop.com	Winthrop & Weinstine, P.A.		225 South Sixth Street Suite 3500 Minneapolis MN, 55402 United States	Electronic Service		No	Official 24-432
229	Peter	Scholtz	peter.scholtz@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	Suite 1400 445 Minnesota Street St. Paul MN, 55101-2131 United States	Electronic Service		Yes	Official 24-432
230	Kay	Schraeder	kschraeder@minnkota.com	Minnkota Power		5301 32nd Ave S Grand Forks ND, 58201 United States	Electronic Service		No	Official 24-432
231	Lori	Schultz	lorischultz@minncap.org	Minnesota Community Action Partnership		MCIT Building 100 Empire Dr Ste 202 St. Paul MN, 55103 United States	Electronic Service		No	Official 24-432
232	Doug	Scott	dscott@gpisd.net	Great Plains Institute		2801 21st Ave Ste 220 Minneapolis MN, 55407 United States	Electronic Service		No	Official 24-432
233	Dean	Sedgwick	sedgwick@itascapower.com	Itasca Power Company		PO Box 455 Spring Lake MN, 56680 United States	Electronic Service		No	Official 24-432
234	Maria	Seidler	maria.seidler@dom.com	Dominion Energy Technology		120 Tredegar Street Richmond VA, 23219 United States	Electronic Service		No	Official 24-432
235	Timothy	Sexton	timothy.sexton@state.mn.us		Minnesota Department of Transportation	395 John Ireland Blvd St. Paul MN, 55155-1899 United States	Electronic Service		No	Official 24-432
236	Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates		7400 Lyndale Ave S Ste 190 Richfield MN, 55423 United States	Electronic Service		No	Official 24-432
237	Patricia	Sharkey	psharkey@environmentallawcounsel.com	Midwest Cogeneration Association.		180 N LaSalle St Ste 3700 Chicago IL, 60601 United States	Electronic Service		No	Official 24-432
238	Bria	Shea	bria.e.shea@xcelenergy.com	Xcel Energy		414 Nicollet Mall Minneapolis MN, 55401 United States	Electronic Service		No	Official 24-432
239	Doug	Shoemaker	dougs@charter.net	Minnesota Renewable Energy		2928 5th Ave S Minneapolis MN, 55408 United States	Electronic Service		No	Official 24-432
240	Anne	Smart	anne.smart@chargepoint.com	ChargePoint, Inc.		254 E Hacienda Ave Campbell CA, 95008 United States	Electronic Service		No	Official 24-432
241	Amanda	Smith	amanda.smith@state.mn.us		Minnesota Pollution Control Agency	520 Lafayette Rd N St. Paul MN, 55155 United States	Electronic Service		No	Official 24-432
242	Beth	Smith	bsmith@greatermankato.com	Greater Mankato Growth		1961 Premier Dr Ste 100	Electronic Service		No	Official 24-432

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						Mankato MN, 56001 United States				
243	Joshua	Smith	joshua.smith@sierraclub.org			85 Second St FL 2 San Francisco CA, 94105 United States	Electronic Service		No	Official 24-432
244	Ken	Smith	ken.smith@ever-greenenergy.com	Ever Green Energy		305 Saint Peter St Saint Paul MN, 55102 United States	Electronic Service		No	Official 24-432
245	Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.		76 W Kellogg Blvd St. Paul MN, 55102 United States	Electronic Service		No	Official 24-432
246	Trevor	Smith	trevor.smith@avantenergy.com	Avant Energy, Inc.		220 South Sixth Street Suite 1300 Minneapolis MN, 55402 United States	Electronic Service		No	Official 24-432
247	Beth	Soholt	bsoholt@cleangridalliance.org	Clean Grid Alliance		570 Asbury Street Suite 201 St. Paul MN, 55104 United States	Electronic Service		No	Official 24-432
248	Anna	Sommer	asommer@energyfuturesgroup.com	Energy Futures Group		PO Box 692 Canton NY, 13617 United States	Electronic Service		No	Official 24-432
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253	Russ	Stark	russ.stark@ci.stpaul.mn.us	City of St. Paul		Mayor's Office 15 W. Kellogg Blvd., Suite 390 Saint Paul MN, 55102 United States	Electronic Service		No	Official 24-432
254	Byron E.	Starns	byron.starns@stinson.com	STINSON LLP		50 S 6th St Ste 2600 Minneapolis MN, 55402 United States	Electronic Service		No	Official 24-432
255	Richard	Stasik	richard.stasik@wecenergygroup.com	Minnesota Energy Resources Corporation (HOLDING)		231 West Michigan St - P321 Milwaukee WI, 53203 United States	Electronic Service		No	Official 24-432
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257	Lindsey	Stegall	lindsey.stegall@evgo.com	EVgo Services, LLC		11835 W Olympic Blvd Ste 900E Los Angeles CA, 90064 United States	Electronic Service		No	Official 24-432
258	Cary	Stephenson	cstephenson@otpc.com	Otter Tail Power Company		215 South Cascade Street Fergus Falls MN, 56537 United States	Electronic Service		No	Official 24-432
259	Scott	Strand	sstrand@elpc.org	Environmental Law & Policy Center		60 S 6th Street Suite 2800 Minneapolis MN, 55402 United States	Electronic Service		No	Official 24-432
260	Dean	Taylor	dtaylor@pluginamerica.org	Plug In America		6380 Wilshire Blvd, Suite 1000 Los Angeles CA, 90048 United States	Electronic Service		No	Official 24-432
261	Hanna	Terwilliger	hanna.terwilliger@state.mn.us		Public Utilities Commission	121 East 7th Place, Suite 350 Saint Paul MN, 55101 United States	Electronic Service		Yes	Official 24-432
262	Stuart	Tommerdah	stommerdah @otpc.com	Otter Tail Power Company		215 S Cascade St PO Box 496 Fergus Falls MN, 56537 United States	Electronic Service		No	Official 24-432
263	Taige	Tople	taige.d.tople@xcelenergy.com	Northern States Power Company dba Xcel Energy-Elec		414 Nicollet Mall 401 7th Floor Minneapolis MN, 55401 United States	Electronic Service		No	Official 24-432
264	Pat	Treseler	pat.jcplaw@comcast.net	Paulson Law Office LTD		4445 W 77th Street Suite 224 Edina MN, 55435 United States	Electronic Service		No	Official 24-432
265	Analeisha	Vang	avang@mnpower.com			30 W Superior St Duluth MN, 55802-2093 United States	Electronic Service		No	Official 24-432
266	Nikhil	Vijaykar	nvijaykar@keyesfox.com	Keyes & Fox LLP		580 California St 12th Floor San Francisco CA, 94104 United States	Electronic Service		No	Official 24-432
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268	Julie	Voeck	julie.voeck@nee.com	NextEra Energy Resources, LLC		700 Universe Blvd Juno Beach FL, 33408 United States	Electronic Service		No	Official 24-432
269	Amelia	Vohs	avohs@mncenter.org	Minnesota Center for		1919 University Avenue West	Electronic Service		No	Official 24-432

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271	Dwight	Wagenius	dwagenius@gmail.com	Minnesota Interfaith Power & Light		4407 E Lake St Minneapolis MN, 55406 United States	Electronic Service		No	Official 24-432
272	Francesca	Wahl	fwahl@tesla.com	Tesla		3500 Deer Creek Rd Palo Alto CA, 94304 United States	Electronic Service		No	Official 24-432
273	Roger	Warehime	roger.warehime@owatonnautilities.com	Owatonna Municipal Public Utilities - Gas		208 S Walnut Ave PO BOX 800 Owatonna MN, 55060 United States	Electronic Service		No	Official 24-432
274	Jenna	Warmuth	jwarmuth@mnpower.com	Minnesota Power		30 W Superior St Duluth MN, 55802-2093 United States	Electronic Service		No	Official 24-432
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284	Kurt	Zimmerman	kwz@ibew160.org	Local Union #160, IBEW		2909 Anthony Ln St Anthony Village MN, 55418-3238 United States	Electronic Service		No	Official 24-432
285	Patrick	Zomer	pat.zomer@lawmoss.com	Moss & Barnett PA		150 S 5th St #1200 Minneapolis MN, 55402 United States	Electronic Service		No	Official 24-432