

August 20, 2024

PUBLIC DOCUMENT

Will Seuffert
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
Saint Paul, Minnesota 55101-2147

RE: **PUBLIC Response Comments, Minnesota Department of Commerce**
Docket No. E002/AA-24-63

Dear Mr. Seuffert:

Attached are the **PUBLIC** response comments of the Minnesota Department of Commerce, Division of Energy Resources (Department) regarding the May 1, 2024 petition and July 31, 2024 reply comments by Northern States Power Company, doing business as Xcel Energy (Xcel) in Docket No. E002/AA-24-63, requesting approval of its 2025 monthly fuel clause adjustment (FCA) rates and associated forecasts.

The Department recommends the Minnesota Public Utilities Commission (Commission) approve Xcel's FCA 2025 forecast petition as updated in Xcel's reply comments. The Department is available to answer any questions the Commission may have in this matter.

Sincerely,

/s/ Dr. Sydnie Lieb
Assistant Commissioner of Regulatory Analysis

SC/ar
Attachment

Before the Minnesota Public Utilities Commission

PUBLIC Response Comments of the Minnesota Department of Commerce Division of Energy Resources

Docket No. E002/AA-24-63

I. INTRODUCTION

On May 1, 2024, Northern States Power Company d/b/a Xcel Energy (Xcel or the Company) filed a petition requesting the Minnesota Public Utilities Commission (Commission) approve Xcel's 2025 forecasted fuel costs and monthly fuel charges, subject to true-up. Xcel also proposes to implement the monthly rate changes on the first day of each month for the 12 months beginning January 1, 2025 and update the FCA tariff sheet to reflect the monthly fuel cost charges to be implemented based on the Commission's decisions in this proceeding. Xcel will provide a final tariff sheet in a compliance filing within 10 days after the Order is received. In order to provide customers with a 30 day notice of the January 1, 2025 rate, Xcel requests that the Commission issue an order by November 30, 2024.

On July 1, 2024, the Minnesota Department of Commerce, Division of Energy Resources (Department) filed comments on Xcel's petition. The Department provided initial recommendations, requested additional information from Xcel, and stated it would provide final recommendations after reviewing Xcel's reply comments providing the additional information and Xcel's updated forecast.

On July 31, 2024, Xcel filed reply comments, in which Xcel provided additional information, updated several inputs to its 2025 forecast, and requested the Commission approve the updated forecast and resulting 2025 monthly FCA rates.¹

The Department files these response comments in compliance with the procedural schedule below, as referenced in the Department's initial comments.

2024 May 1	Utilities submit 2025 forecast and rates
2024 July 1	Review & initial comments by consumer advocates of 2025 rates
2024 July 31	Utility reply comments on 2025 rates (forecast inputs updated)
2024 Aug. 30	Response by consumer advocates for 2025 rates
2024 Nov. 29	Commission's order on 2025 rates
2024 Dec. 1	Publication of 2025 rates
2025 Jan. 1	Implement 2025 rates

¹ Xcel Reply Comments, Attachment A, page 2 of 5.

II. SUMMARY OF XCEL'S REPLY COMMENTS

A. OVERVIEW

Department Table 1 below shows Xcel's approved forecasts and costs in each year, with a comparison to this year's 2025 forecast. Xcel's initial petition in the instant docket requested 2025 forecasted costs of \$888.6 million and unit costs of \$33.00 per megawatt-hour (MWh). Xcel's reply comments provided an updated forecast of 2025 costs of \$891.2 million² and unit costs of \$33.27/MWh, equal to a \$2.6 million and \$0.27/MWh increase relative to the initial forecast.³

**Department Table 1:
 Xcel Minnesota Net FCA Costs: 2020-2025**

Year	Docket	Forecasted Cost	Actual Cost	Forecast Unit Cost	Actual Unit Cost	Actual Recoveries	Over/(Under) Recovery
		\$ millions		\$/MWh		\$ millions	
2020	19-293	796.1	746.3	27.81	27.07	741.3	(5.0)
2021	20-417	749.7	894.1	27.78	31.71	812.3	(81.8)
2022	21-295	849.4	950.2	31.47	33.55	954.0	3.8
2023	22-179	1,039.2	935.3	37.87	33.44	1,061.3	126.0
2024	23-153	1,022.7	TBD	38.10	TBD	TBD	TBD
2025	24-63	891.2*	TBD	33.27	TBD	TBD	TBD

*Instant petition (not yet approved)

Xcel's reply comments provided updated attachments as listed below:

- Attachment A: corresponding to Part A, Attachment 1 of the initial forecast filing;
- Attachment B: corresponding to Part A, Attachment 2 of the initial filing;
- Attachment C: corresponding to Part A, Attachment 3 of the initial filing;
- Attachment D, with updated coal pricing;
- Attachment E, with updated gas and LMP pricing;
- Attachment F, corresponding to Part B, Attachment 9 and Part F, Workpaper 5 of the initial filing;
- Attachment G, corresponding to Part B, Attachment 7 of the initial filing;
- Revised Part G, Workpaper 10, showing forecasted outage rates; and
- Attachment H, showing Xcel's updated proposed tariff changes.

As summarized on pages 5-7 of the reply comments, Xcel updated the following inputs:

- Coal prices,
- Natural gas prices,
- MISO locational marginal prices,
- MISO costs and revenues,
- Outage costs,
- Power purchase agreements (PPAs),
- Benson Power, LLC early termination costs
- Jurisdictional allocators.

² Xcel Reply Comments, Attachment A, page 1 of 5, line 65.

³ *Id.*, line 71.

The Department reviews these input updates in section III of these response comments.

B. FCA COST SUMMARY

Xcel provided its initial forecasted 2025 FCA cost summary in Part A, Attachment 1, page 1 of 3, of the instant petition. Xcel updated this summary in Attachment A, page 1 of 5, of its reply comments.

Department Table 2 below summarizes Xcel’s FCA costs for its 2025 forecast as updated in Xcel’s reply comments, its approved 2024 forecast, as well as 2021-2023 actuals and averages. This table is an updated version of the table on page 13 of the Department’s initial comments.

**Department Table 2:
 Updated Xcel Minnesota Net FCA Costs: 2020-2025 (in 1000’s)**

		2025	2024	2023	2022	2021	2021-23 Avg.
		Forecast*	Forecast**	Actuals			
		[TRADE SECRET DATA EXCISED]					
1	Own Generation	\$		\$ 485,138	\$ 633,483	\$ 563,490	\$ 560,704
2	+ Long-Term Purchased Energy	\$		\$ 579,164	\$ 639,497	\$ 559,674	\$ 592,778
3	+ Community Solar Gardens	\$	\$ 264,458 \$ 329,263	\$ 206,275	\$ 184,030	\$ 183,652	\$ 191,319
4	+ MISO Market Charges	\$		\$ 148,146	\$ 239,474	\$ 229,886	
5	+ Short-Term Market Purchases	\$		\$ 94,895	\$ 146,773	\$ 85,141	\$ 108,936
6	= Total NSP System Costs	\$		\$ 1,513,618	\$ 1,843,257	\$ 1,621,843	\$ 1,659,573
7	- Asset-Based Sales Revenues	\$		\$ (282,329)	\$ (564,368)	\$ (437,200)	\$ (427,966)
8	- CSG-AMC	\$	\$ (184,921) \$ (249,377)	\$ (155,166)	\$ (99,903)	\$ (110,745)	\$ (121,938)
9	- RC Pilot	\$		\$ (6,739)	\$ (6,291)	\$ (6,190)	\$ (6,407)
10	- RC MTM	\$		\$ (16,858)	\$ (18,190)	\$ (12,169)	\$ (15,739)
11	- RC LT	\$		\$ -	\$ -	\$ -	\$ -
12	= Net System FCA Costs	\$		\$ 1,052,526	\$ 1,154,506	\$ 1,055,539	\$ 1,087,524
13	Net System Sales***	MWh	38,242,162 38,197,851	39,260,332	39,686,566	39,305,604	39,417,501
14	Net System FCA Unit Costs	\$/MWh		\$26.81	\$29.09	\$26.85	\$27.59
15	Net MN Sales	MWh	26,788,077 26,842,355	27,971,766	28,318,349	28,195,869	28,161,995
16	MN FCA Costs	\$		\$ 753,515	\$ 824,270	\$ 758,124	\$ 778,636
17	+ CSG-AMC	\$	\$ 184,921 \$ 249,377	\$ 155,061	\$ 99,883	\$ 110,646	\$ 121,863
18	+ Laurentian Buyout	\$		\$ -	\$ 13,062	\$ 13,192	\$ 8,751
19	+ Benson Buyout	\$		\$ 22,412	\$ 9,844	\$ 10,249	\$ 14,168
20	+ Other adjustments	\$		\$ 4,349	\$ 3,162	\$ 1,834	\$ 3,115
21	Net MN FCA Costs	\$	\$ 891,200 \$ 1,022,748	\$ 935,337	\$ 950,221	\$ 894,044	\$ 926,534
22	Net MN FCA Unit Costs	\$/MWh	\$33.27 \$38.10	\$33.44	\$33.55	\$31.71	\$32.90
23	MN FCA Premium Unit Costs****	\$/MWh		\$6.63	\$4.46	\$4.85	\$5.31
			[TRADE SECRET DATA EXCISED]				

* 7/31/24 Reply Comments, Attachment A

** 7/31/23 Reply Comments in Docket No. E002/AA-23-153, Attachment A.

*** Net system sales are assumed to be the same as DOC initial comments due to NSPM system sales also not changing.

**** The costs of CSGs and biomass buyout costs are both solely assigned to the Minnesota jurisdiction.

Relative to Xcel's initial 2025 forecast FCA cost, forecasted system sales are the same and forecasted system costs are slightly lower, resulting in slightly lower forecasted unit costs at the system level. A key input in the change in costs is 4.5% lower forecasted natural gas commodity prices, which results in lower unit costs for owned and purchased natural gas generation. Lower-than-forecasted gas prices also result in 0.7% lower forecasted LMPs.⁴ Lower forecasted LMPs are a main driver in the reduction in forecasted 2025 asset-based sales revenues from **[TRADE SECRET DATA HAS BEEN EXCISED]**.⁵

With forecasted system unit costs decreasing by 0.3% compared to Xcel's initial forecast,⁶ the Department observed two main reasons for the 0.8% increase in Minnesota unit costs.⁷ First, Xcel decreased the net Minnesota sales forecast by 0.5%.⁸ Second, Xcel's community solar garden (CSG) above market costs (AMC) forecast increased by 1.2% (which is fully assigned to Minnesota) due to the change in forecasted LMPs (forecasted CSG costs overall did not change).⁹

The Department reviews Xcel's forecast updates in more detail below.

III. REVIEW OF FORECAST UPDATES & REPLY TO XCEL

As noted earlier in these response comments and summarized on page 5-7 of Xcel's reply comments, Xcel proposed nine input updates in its reply comments (coal prices, natural gas prices, MISO LMPs, MISO costs and revenues, outage costs, PPAs, Benson early termination costs, jurisdictional allocation, and Renewable*Connect sales). The Department reviews these input updates below. The Department also replies to Xcel regarding areas where the Department requested additional information.

A. COAL PRICES, NATURAL GAS PRICES, AND MISO PRICES

The first three input updates are a slight decrease in forecasted coal prices (Attachment D), natural gas prices, and LMPs (see Attachment E). The Department concludes these updates are reasonable given they reflect updated commodity price information. The Department notes that LMPs also impact Xcel's forecasted net MISO revenues and CSG-AMC costs.

⁴ Xcel reply comments, page 6 and Attachment E.

⁵ Department Table 2 above and Department Table 3 in the Department's 7/1/24 comments.

⁶ **[TRADE SECRET DATA HAS BEEN EXCISED]**

⁷ \$33.00/MWh as shown in Table 3 of the Department's initial comments, versus \$33.27/MWh in the table above.

⁸ 26,922,097 MWh as shown in Table 3 of the Department's initial comments, versus 26,788,077 MWh in the table above.

⁹ \$182,742,000 as shown in Table 3 of the Department's initial comments, versus \$184,921,000 in the table above.

B. NET MISO REVENUES

The fourth update is a decrease in net MISO revenues from as shown in the table below.

Line	Item	Reply	
		Initial Filing	Comments
	[TRADE SECRET DATA EXCISED		
		\$	%
1	Asset-Based Sales Revenues		
2	ST Market Purchases		
3a	Congestion		
3b	FTR		
3c	Incremental Transmission Losses		
3d	RSG/RNU		
3e	ASM		
3 = Σ(3a:3e)	MISO Charges		
4 = 1 - 2 - 3	Net MISO revenues		
			...TRADE SECRET DATA EXCISED]

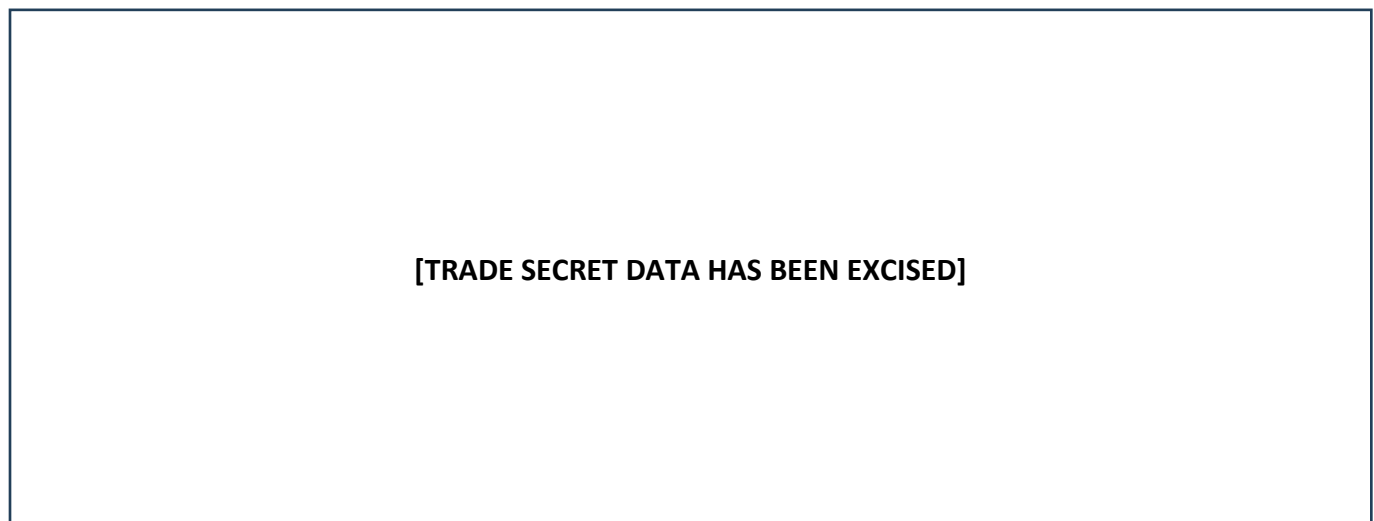
Sources:

Lines 1-2: Initial Petition, Part A, Att. 1 and Reply Comments, Att. A

Line 3: Initial Petition, Part B, Att. 9 and Reply Comments, Att. F

In Attachment F of its reply comments, Xcel stated that its updated MISO cost and revenue forecast was based on **[TRADE SECRET DATA HAS BEEN EXCISED]** based on observed congestion cost trends as shown in the figure below.

**Figure 1: Xcel Congestion Costs (Trade Secret in Entirety)
 from Xcel Reply Comments, Att. F**



The Department concludes Xcel's updates to forecasted MISO charges are reasonable considering the trends cited above.

C. PPAS

Xcel's reply comments state that it updated the PPA costs to reflect **[TRADE SECRET DATA HAS BEEN EXCISED]** as reflected in Line 22 of Attachment A, page 1 of Xcel's reply comments. The Department agrees with this update given it reflects known PPA updates.

D. BENSON EARLY TERMINATION

Xcel updated the rate of return on equity applied to the early termination of the PPA between Xcel and Benson Power, LLC from 9.06% to 9.25%, to reflect the Commission's Orders in Docket No. E002/GR-21-630 (July 27, 2023), E002/AA-19-293 (November 14, 2019), and E002/M-17-530 (January 23, 2018). The Department agrees with this update given Order Point 3 of the January 13, 2018 Order in Docket No. E002/M-17-530 states that the rate of return on buyout costs is subject to future revision and Xcel updated the rate of return pursuant to the November 14, 2019 Order in Docket No. E002/AA-19-293. The Department notes that this update has no material effect on FCA rates.

E. JURISDICTIONAL ALLOCATORS

Xcel updated the interchange agreement energy allocators, with the average monthly allocators increasing by 0.3%.¹⁰ As a result, Xcel's NSPM system costs excluding CSG-AMC and Renewable*Connect (R*C) costs, slightly increased as a percentage of NSP net system costs excluding CSG-AMC costs.¹¹ As noted above, in part due to this change in jurisdictional allocation, Xcel's net Minnesota FCA costs as a percentage of net system FCA costs increased from 70.65% to 70.88%.¹² The Department agrees with Xcel's updated to the jurisdictional energy allocator since this allocation is prescribed by the Company's interchange agreement approved by the Federal Energy Regulatory Commission.

*F. RENEWABLE*CONNECT SALES*

As noted above, Xcel's system sales forecast stayed the same, but Xcel's net Minnesota sales forecast decreased by 0.5%. The difference in Xcel's net Minnesota sales forecast is solely attributable to a forecasted increase in R*C flex MWh sales and R*C LT MWh sales, with forecasted NSPM system MWh sales staying the same.¹³ The Department appreciates Xcel updating forecasted R*C sales to reflect the latest information available.

¹⁰ Calculated from Part A, Att. 1, p. 1, line 38 of Xcel's initial forecast and Att. 1, p. 1, line 38 of Xcel's reply comments.

¹¹ Lines 35 and 40 of Part A, Att. 1, p. 1 of Xcel's initial forecast and Att. 1, p. 1 of Xcel's reply comments.

¹² Calculated from Table 3 in the Department's initial comments and Table 2 in these response comments.

¹³ Lines 43-49 of Part A, Att. 1, p. 1 of Xcel's initial filing and Att. A, p. 1 of Xcel's reply comments. As a result of R*C forecasted MWh sales increases, R*C costs as shown on lines 32-33 also increased.

G. *OUTAGES*

Xcel's reply comments updated forecasted 2025 planned and unplanned outages. As a result, Xcel's forecasted outage MWh and replacement power costs have changed as shown in Attachment G, which corresponds to Part B, Attachment 7 of the initial petition. Planned outages were updated to reflect Xcel's most recent maintenance schedules,¹⁴ with overall planned outages being approximately the same as in the initial forecast. Overall unplanned outages are also roughly the same.

Regarding unplanned outages, the Department's initial comments (page 23) requested Xcel explain, in reply comments, (a) its methodology for forecasting unplanned outages at each baseload unit and (b) how its forecasted unplanned outage rates for coal plants are reasonable and prudent. As noted in the Department's initial comments, the Department was particularly concerned regarding the outage rates at Xcel's coal units.

Xcel's reply comments clarified that the baseload outage rates shown in Table 8 of the Department's initial comments, from Xcel's initial petition (Part B, Att. 6, page 1 of 2 and Part G, Workpaper 7) are in fact combined planned and unplanned outage rates. The Department appreciates this clarification, as the initial petition labeled Part B, Attachment 6 and Part G, Workpaper 7 as the "forced" outage calculation for baseload plants with the associated spreadsheets also referring to "forced" outages rates.

The Department discussed the issue with Xcel and understands the Company will correctly label the combined outage rate schedules in future FCA filings, while also clarifying its outage forecast process. In addition, Xcel clarified to the Department that these combined outage rates are used as single input in PLEXOS to represent Xcel's estimated total random outages by unit—meaning all outages except those specifically planned, as shown in Part B, Attachment 5. As explained by Xcel, these total random outages are estimated using five-year averages, except for coal units to which Xcel adds an "ES Adder" based on Xcel's unit-level assumptions for above-average outages for 2025.¹⁵

The Department concludes Xcel has reasonably clarified its procedures for forecasting its 2025 outages. The Department therefore recommends the Commission accept Xcel's 2025 outage forecast for the purpose of setting 2025 rates, subject to true-up. However, for clarity the Department notes that, as in prior years, Xcel's outages will continue to be reviewed for reasonableness and prudence when Xcel files its proposed true-up with 2025 actual FCA costs.

¹⁴ Xcel reply comments, page 6. While the Department is not concerned about Xcel's planned maintenance forecast updates in the current docket given the overall forecasted planned maintenance has not significantly changed, the Department would appreciate Xcel including its updated planned maintenance schedule in future forecast update reply comments to make explicit what Xcel has changed versus its initial forecast. In addition, the Department notes that Xcel's forecasted planned maintenance is reviewed for rate forecasting purposes only, with prudence and reasonableness reviewed when Xcel files its actual costs in its annual true-ups following the forecast year.

¹⁵ Xcel reply comments, page 2.

H. COMMUNITY SOLAR GARDEN EXCLUSION RATE

As noted in the Department's initial comments (page 25), Xcel is now required to exclude the net cost of CSGs for customers eligible for bill payment assistance and not subscribing to a CSG. Xcel's initial petition stated it would propose to implement the tariff to allow for this exclusion in the coming months. Xcel's reply comments noted the Company's intent to soon file a motion to establish the net CSG rate tariff in in Docket Nos. E002/CI-23-335, E002/M-13-867, and E002/AA-24-63. Xcel filed the motion on August 2, 2024. The Department filed a letter in those dockets responding to the motion, which fully addresses the CSG exclusion rate issue. As noted in the letter, for the purposes of Xcel's 2025 FCA forecast, the Department accepts Xcel's forecasted CSG exclusion rate.

I. LAND SALES CREDITS

On April 12, 2023, the Commission issued an Order in Docket No. E002/PA-23-110 approving Xcel's sale of 6.80 acres to the City of Becker and approving the proposed accounting treatment of the sales revenue for the sale, with a gain on sale of \$203,447 Total Company and for \$148,069 Minnesota jurisdiction, to be credited to customers through the FCA. The Commission required Xcel to submit a compliance filing within 60 days of the Commission's approval, showing the actual accounting journal entries recorded.

In a similar decision, on May 2, 2023, the Commission issued an Order in Docket No. E002/PA-23-118 approving Xcel's sale of 10.94 acres of land and 0.56 acres of temporary easement to the City of Red Wing. The Commission allowed the gain on sale to be credited to ratepayers through the FCA and required Xcel to submit a compliance filing within 60 days showing the actual account journal entries recorded as a result of the sale.

On June 5, 2023, Xcel submitted an initial compliance filing, stating that the Becker sale closed on June 2, 2023. Xcel provided draft journal entries and stated that it would provide final journal entries upon receipt of all costs. On June 7, 2024, Xcel submitted a compliance filing with final journal entries for the Becker, showing a final net Minnesota jurisdictional gain of \$139,584.

For the Red Wing sales, Xcel submitted compliance filings on June 30, 2023 and June 7, 2024. The latter filing stated that the Minnesota jurisdictional gain of \$59,025 will be credited to Minnesota customers through the FCA.

Xcel's reply comments in the instant docket state that the 2025 FCA forecast was updated to include the \$148,069 Minnesota jurisdiction credit from the Becker land sale and \$59,025 Minnesota jurisdiction credit from the Red Wing sales. Xcel included the credits in Attachment A, pages 3-4, above line 1.¹⁶

The Department concludes Xcel's inclusion of these credits is consistent with the Commission Orders above requiring them to be included in the FCA. In addition, the Department concludes Xcel has appropriately reflected these credits in its calculation of forecasted FCA rates.

¹⁶ Xcel reply comments, page 8.

J. RATE CALCULATIONS

Xcel's reply comments provide updated 2025 FCA rate calculations in Attachment A, pages 3-5. The Department confirmed Xcel used the same approved methodology shown in Part A, Attachment 1, pages 3a and 3b of the Company's May 1, 2024 initial filing. Xcel provided its updated proposed tariff sheets as Attachment H.

IV. RECOMMENDATIONS

Based on our review and analysis, the Department provides the following recommendations, which are the same recommendations from the Department's initial comments, updated to incorporate information provided by Xcel in reply comments and Xcel's August 2, 2024 motion.

Compliance Items:

The Department recommends the Commission accept Xcel's compliance with reporting requirements for the instant petition relating to its 2025 FCA forecast.

Sales Forecast:

The Department recommends the Commission accept Xcel's 2025 forecasted sales in this proceeding, subject to subsequent true-up.

Company Owned Generation:

The Department recommends the Commission accept Xcel's updated forecast of 2025 fuel costs for company-owned generation for the purpose of setting initial 2025 FCA rates in this proceeding, subject to subsequent true-up.

Long-Term PPAs:

The Department recommends the Commission accept Xcel's updated forecast of 2025 long-term purchased energy costs for the purpose of setting initial 2025 FCA rates in this proceeding, subject to subsequent true-up.

MISO Costs & Revenues

The Department recommends the Commission accept Xcel's updated forecast of 2025 MISO costs and revenues for the purpose of setting initial 2025 FCA rates in this proceeding, subject to subsequent true-up.

Outage Costs:

The Department concludes Xcel has reasonably explained its updated forecast of 2025 outage costs and recommends the Commission accept Xcel's updated forecast of 2025 outage costs for purposes of establishing FCA rates in this proceeding, subject to true-up.

Wind Production:

The Department recommends the Commission accept Xcel's forecasted 2025 wind production for the purposes of setting 2025 rates, subject to true-up. The Department will provide a more detailed review of Xcel's 2025 wind production when Xcel files its 2025 true-up petition.

Minnesota-Only FCA Costs (Community Solar Gardens – Above Market Costs and Biomass Buyout Costs):

The Department recommends the Commission accept Xcel's updated forecast of 2025 CSG-AMC costs and related rates for the purpose of setting initial 2025 FCA rates in this proceeding, subject to subsequent true-up.

The Department also recommends the Commission accept Xcel's updated forecast of 2025 biomass buyout costs for the purpose of setting initial 2025 FCA rates in this proceeding, subject to subsequent true-up.

Land Sales Adjustments

The Department recommends the Commission accept Xcel's proposed incorporation of 2024 land sales gains to Becker of \$148,069 credit and Red Wing of \$59,025 credit into 2025 FCA rates.

Jurisdictional & Class Cost Allocation:

The Department recommends approval of Xcel's proposed jurisdictional (including updated interchange allocators) and class cost allocations for 2025 forecast purposes, subject to true-up.

CERTIFICATE OF SERVICE

I, Sharon Ferguson, hereby certify that I have this day, served copies of the following document on the attached list of persons by electronic filing, certified mail, e-mail, or by depositing a true and correct copy thereof properly enveloped with postage paid in the United States Mail at St. Paul, Minnesota.

**Minnesota Department of Commerce
Public Response Comments**

Docket No. E002/AA-24-63

Dated this **20th** day of **August 2024**

/s/Sharon Ferguson

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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_24-63_AA-24-63

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Brian	Edstrom	briane@cubminnesota.org	Citizens Utility Board of Minnesota	332 Minnesota St Ste W1360 Saint Paul, MN 55101	Electronic Service	No	OFF_SL_24-63_AA-24-63
Rebecca	Eilers	rebecca.d.eilers@xcelenergy.com	Xcel Energy	414 Nicollet Mall - 401 7th Floor Minneapolis, MN 55401	Electronic Service	Yes	OFF_SL_24-63_AA-24-63
John	Farrell	jfarrell@ilsr.org	Institute for Local Self-Reliance	2720 E. 22nd St Institute for Local Self-Reliance Minneapolis, MN 55406	Electronic Service	No	OFF_SL_24-63_AA-24-63
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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