



414 Nicollet Mall
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November 17, 2025

—Via Electronic Filing—

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

RE: REPLY COMMENTS
IN THE MATTER OF THE APPLICATION OF NORTHERN STATES POWER
COMPANY FOR AUTHORITY TO INCREASE RATES FOR NATURAL GAS SERVICE
IN THE STATE OF MINNESOTA
DOCKET NO. G002/GR-25-356

Dear Ms. Bergman:

Northern States Power Company, doing business as Xcel Energy, submits to the Minnesota Public Utilities Commission the enclosed Reply Comments pursuant to the Commission's November 3, 2025 NOTICE OF COMMENT PERIOD ON COMPLETENESS AND PROCEDURES and in response to parties' comments received November 12, 2025 in the above-noted docket.

We have electronically filed this document with the Minnesota Public Utilities Commission, and copies have been served on the parties on the attached service list. Please contact me at amy.a.liberkowski@xcelenergy.com or contact Amber Hedlund at amber.r.hedlund@xcelenergy.com if you have any questions regarding this filing.

Sincerely,

/s/

AMY A. LIBERKOWSKI
REGIONAL VICE PRESIDENT, REGULATORY AND PRICING
NORTHERN STATES POWER COMPANY, A MINNESOTA CORPORATION

cc: Service List

STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION

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

IN THE MATTER OF THE APPLICATION
OF NORTHERN STATES POWER
COMPANY FOR AUTHORITY TO
INCREASE RATES FOR NATURAL GAS
SERVICE IN THE STATE OF MINNESOTA

DOCKET NO. G002/GR-25-356

REPLY COMMENTS

INTRODUCTION

On October 31, 2025, Northern States Power Company, doing business as Xcel Energy (Xcel Energy or Company), filed a request for authority to increase its rates for natural gas in the above-captioned dockets (Application). On November 3, 2025, the Minnesota Public Utilities Commission (Commission) issued its NOTICE OF COMMENT PERIOD ON COMPLETENESS AND PROCEDURES (Notice) setting out the following topics for comments: (1) whether the Company's Application was complete; and (2) whether the matter should be sent to the Court of Administrative Hearings (CAH) for a contested case hearing and, if so, what the scope of that hearing should be. On November 12, 2025, the Minnesota Department of Commerce, Division of Energy Resources (Department), Office of Attorney General – Residential Utilities Division (OAG) and Citizens Utility Board (CUB) (collectively, Commenters) filed comments. The Company files this reply, addressing the topics as set forth in the Notice.

COMMENTS

I. COMPLETENESS

Only the Department commented on whether the Company's filing complied with the requirements for general rate case filings set forth in Minnesota statutes, rules, and relevant Commission Orders and policy statements. The Company appreciates the Department's thorough review of the Company's filing and agrees with the

Department that the Company's filings are substantially complete and should be accepted.

II. PROCEDURE AND SCOPE

A. Referral to CAH

The Department recommended that this matter be referred to the CAH for a contested case proceeding, focused on the following three core issues, together with any particular issues the Commission identifies: (1) are the test year revenue requirement increases sought by the Company reasonable, or will they result in unreasonable and excessive earnings; (2) is the class cost of service and proposed rate design reasonable; and (3) are the Company's proposed capital structure, cost of capital, and return on equity reasonable. The Company agrees with the Department's recommendation on these matters.

The OAG and CUB also recommended referral of this matter to CAH for a contested case proceeding, and identified other potential issues each plans to assess.

The Company agrees that this matter should be referred to the CAH for a contested case proceeding and will work to develop a robust record on all issues identified by the Commission for record development.

B. CUB Proposal for Email Notice to Customers

CUB also recommended that the Commission require the Company to provide email notice to customers regarding this gas rate proceeding, in a form similar to the form utilized in the Company's recent electric rate case (Docket No. E002/GR-24-320) as requested by the Commission's Consumer Affairs Office (CAO). The Company recognizes this approach required Commission Staff to deploy significant additional resources, but otherwise has no objection to providing email notice generally. Should the Commission direct email notice, the Company will work with the CAO and Executive Secretary as needed to develop the format of the email notice.

III. OTHER ISSUES

A. CUB Petition to Intervene

CUB included in its Comments a request to intervene in this matter, with all rights of a party. The Company has no objection to CUB's request.

B. Interim Rates

Although the Commission's November 3, 2025 Notice of Comment Period on Completeness and Procedures did not open the Company's interim rate request for comment,¹ the Department, OAG, and CUB each propose modifications to the Company's interim rate proposal. The Department and CUB suggest that economic factors largely tied to the recently-ended government shutdown and federal policy may create exigent circumstances, and the OAG suggests that the Company's SEP Rider proposal in Docket No. G002/M-25-403 creates exigent circumstances. The Department and CUB appear to propose a 50 percent reduction in interim rates. While the Department limits the proposed reduction to the residential class, CUB's proposal is less clear.² The OAG proposes to limit the Company's overall interim rates to the amounts set forth in the Company's Petition for Approval of SEP Rider Recovery with True-Up Mechanisms ("SEP Rider Petition"), which the Company submitted in good faith as an alternative to a fully-litigated rate case proceeding. For the reasons discussed herein, the Company strongly opposes any reduction to the Company's proposed interim rates.

1. *The Interim Rate Statutory Formula*

Minn. Stat. §216B.16, subd. 3, sets forth a statutory formula for calculating a utility's interim rates that is only to be modified when exigent circumstances exist. Here, no party suggests the Company's interim rate proposal deviates from the statutory formula. Rather, the proposals to reduce interim rates hinge on a Commission finding of exigent circumstances, which the OAG defines as "[a] situation that demands unusual or immediate action and that may allow people to circumvent usual procedures."³

¹ Minnesota Statutes provide clear direction on the process to be followed for setting interim rates: "The Commission shall order the interim rate schedule ex parte without a public hearing." Minn. Stat. § 216B.16, subd. 3(a). Following this statutory directive, the Commission should dismiss comments on the establishment of interim rates. However, this Reply addresses interim rate comments on the merits to further underscore why the proposed change in interim rates is inappropriate.

² CUB does not specify whether its proposal to reduce interim rates by 50 percent reduction is specific to the residential class. However, CUB's bases for its proposal consistently refer to "households." CUB Comments at 3, 4, and 5.

³ OAG Comments at 5. *See also In re Application of Minn. Power for Auth. To Increase Rates for Elec. Servs. In Minn.*, 807 N.W.2d 484, 490 (Minn. Ct. App. 2011) ("we conclude that the legislature intended to confer upon the commission the flexibility to deal with unusual situations in which it may be inappropriate to apply the statutory interim-rates formula.").

Contrary to this definition, however, parties in Minnesota rate cases have not treated “exigent circumstances” as pertaining to unusual procedures or situations. Instead, for more than a decade, parties to utility rate cases have argued for exigent circumstances in virtually all of the Company’s gas and electric rate cases, as well as in rate cases for at least five other utilities.⁴ In other words, although a finding of exigent circumstances calls for an unusual situation, the reality is that it would be unusual for *no* party to suggest exigent circumstances exist. As such, the comments arguing for reductions in interim rates should be reviewed with commensurate skepticism.

2. *The Statutory Interim Rate Formula Has Produced Reasonable Outcomes*

For Xcel Energy, the interim rate statutory formula has resulted in reasonable interim rates for each of the Company’s recent gas rate cases. As illustrated in **Table 1** below, interim rates in the Company’s past two gas rate cases (Docket No. G002/GR-23-413 and G-002/GR-21-678) were already 13.3 percent and 30.2 percent below the Company’s final rate requests, respectively. Perhaps more tellingly, the Company’s final rates in the 2023 gas rate case were 97.9 percent of interim rates. Similarly, the Company’s final rates in the 2021 gas rate case were 83.9 percent of interim rates.

⁴ See, e.g., Xcel Energy’s 2013 Electric Rate Case, Docket No. E002/GR-13-868 (Nov. 14, 2013); Xcel Energy’s 2015 Electric Rate Case, Docket No. E002/GR-15-826 (Nov. 12, 2015); Minnesota Power’s 2016 Electric Rate Case, Docket No. E015/GR-16-664 (Nov. 14, 2016); CenterPoint Energy’s 2019 Natural Gas Rate Case, Docket No. G008/GR-19-524 (Nov. 7, 2019); Minnesota Power’s 2019 Electric Rate Case, Docket No. E015/GR-19-442 (Nov. 12, 2019); Otter Tail Power Company’s 2020 Electric Rate Case, Docket No. E017/GR-20-719 (Nov. 12, 2020); Xcel Energy’s 2020 Electric Rate Case, Docket No. E002/GR-20-723 (Nov. 12, 2020); CenterPoint Energy’s 2021 Natural Gas Rate Case, Docket No. G008/GR-21-435 (Nov. 10, 2021); Minnesota Power’s 2021 Electric Rate Case, Docket No. E015/GR-21-335 (Nov. 15, 2021); Xcel Energy’s 2021 Electric Rate Case, Docket No. E002/GR-21-630 (Oct. 21, 2022); Xcel Energy’s 2021 Natural Gas Rate Case, Docket No. G002/GR-21-678, OAG Comments (Nov. 10, 2021); Minnesota Energy Resources Corporation’s 2022 Natural Gas Rate Case, Docket No. G011/GR-22-504 (Nov. 10, 2022); Minnesota Power’s 2023 Electric Rate Case, Docket No. E015/GR-23-155 (Nov. 13, 2023); CenterPoint Energy’s 2023 Natural Gas Rate Case, Docket No. G008/GR-23-173 (Nov. 13, 2023); Xcel Energy’s 2024 Electric Rate Case, Docket No. E002/GR-24-320 (Nov. 12, 2024); Otter Tail Power Company’s 2025 Electric Rate Case, Docket No. E017/GR-25-359 (Nov. 10, 2025).

Table 1
Interim Rates Comparison (NSPM Gas)

	Docket No. G002/GR-23-413	Docket No. G002/GR-21-678
Proposed Net Incremental Revenue Deficiency	59.0	35.6
Interim Rates	51.2	24.9
Interim Rates as % of Proposed Final	86.7%	69.8%
Final Approved Rates	50.1	20.9
Final Rates as % of Interim Rates	97.9%	83.9%

Plainly, reducing the Company's interim rates by 50 percent for residential customers, or to the level of the Company's SEP Rider Petition as the OAG recommends, would make it highly unlikely the Company's interim rates would be a fair representation of either the Company's actual costs or of potential final rate outcomes, let alone the statutory formula. Moreover, based on past rate cases, such a reduction would make it highly likely that the Company would be unable to recover its Commission-approved, prudently incurred costs through the interim rate period.

The statutory interim rate formula also provides significant protections that favor customers, including residential customers. The interim rate statute is designed to enable the Company to recover the large majority of its requested costs during the necessarily lengthy regulatory process, while providing a refund to customers with interest in the event interim rates exceed final rates. In the event final rates exceed interim rates, the Company's recoupment of any under recovery is limited in time, and billed without interest.⁵ In short, the Company's proposed interim rates in this proceeding not only align with the statutory calculation formula but also the policy and structure of the interim rate statute as a whole. Conversely, the options presented to the Commission to unilaterally reduce the Company's interim rates are not symmetrical and make it highly unlikely the Company's interim rates will align with just and reasonable final rate outcomes.

Moreover, because the primary driver of the rate increase request in this case is capital investments, lowering the interim rate request would unduly deny the Company the opportunity to recover the costs of its investments. As described in its Application, the Company has incurred significant capital costs by recently placing a number of

⁵ Minn. Stat. § 216B.16, subd. 3(c).

capital projects in service. These projects – like investments in transmission and distribution infrastructure – are necessary for the Company to provide all customers with safe, reliable natural gas service. Thus, reducing the interim rate request would effectively deny the Company the opportunity to recover the costs of infrastructure in which it has invested to ensure “adequate, efficient, and reasonable service” for customers.⁶

Finally, deviations from the statutory interim rate formula have historically resulted in surcharges to customers, created confusion, and complicated the interim rate true-up process. For example, where the Commission found exigent circumstances to reduce the Company’s final rates in the Company’s 2021 electric rate case, a comparison between the final rate revenue deficiency and the reduced interim rates resulted in final rate surcharges to some customer classes and interim rate refunds to others. In other situations, reductions of interim rates due to exigent circumstances have resulted in surcharges to all customers once final rates were established.⁷ As demonstrated by appeals in recent years related to Minnesota utilities’ interim rate refunds, questions arise as to how to apportion initial interim rate reductions among customers when a reduction is ordered and, after conclusion of the case, how to apportion refunds for customer classes that did not receive a reduction in the first place. The Company endeavors to provide any interim rate refunds as quickly and efficiently as possible, which has been made more difficult where interim rates are not established under the statutory formula.

3. Department and CUB Comments

Despite the foregoing discussion, each of the Department, CUB, and OAG suggests somewhat different bases for exigent circumstances claims. CUB and the Department primarily premise their exigent circumstances claims on the federal government shutdown and its delay of access to important benefits such as household assistance programs and federal loan programs. CUB speaks of the shutdown in the present tense, as it ended the day CUB filed its Comments, whereas the Department focuses on potential lingering or the possibility of another future federal government shutdown. The Department and CUB also express concern that federal tax credits associated with the Affordable Care Act could expire at the end of 2026 if Congress is unable to reach an agreement to extend them. There are multiple issues with these comments as they pertain to the establishment of interim rates.

⁶ Minn. Stat. § 216B.16, subd. 6.

⁷ See Minnesota Power Interim Rate Undercollection Plan in Docket No. E015/GR-09-1151 (Mar. 7, 2011).

First, the comments regarding the federal government shutdown do not acknowledge its timing, nor the disparate timelines between the federal government shutdown that ended as of November 12, 2025, and that interim rates will not be implemented until January 1 of 2026. As of these Reply Comments, the State of Minnesota has had success maintaining food assistance and other programmatic support for Minnesota's most vulnerable citizens during the shutdown, federal benefits have been or are being restored, and federal employees have returned to work. Throughout the shutdown, the Company has continued to administer its energy assistance programs, and will continue to work with those customers who need assistance with their energy bills throughout 2025 and 2026 and beyond. At the same time, the implementation of interim rates is still more than a month in the future.

The Department's and CUB's comments also do not acknowledge that the circumstances they have identified as giving rise to exigent circumstances for customers are temporary and evolving, whereas the Commission establishes interim rates for a year or more due to the length of the State regulatory process. Similarly, arguments regarding a potential for additional shutdowns or other federal legislative decisions at year-end are premised on speculation about what may occur in the future, which are not known nor guaranteed. Such speculation does not meet the definition of a situation "requiring immediate aid or action" or "demand[ing] unusual or immediate action," as Minnesota courts have defined "exigent circumstances."⁸ Just as problematic, permanently reducing interim rates for customers in light of temporary and possible future circumstances would result in a highly disproportionate impact to the utility, and is not reasonable.

The suggestion that a state utility's statutory interim rates could be reduced as a result of a variety of federal policy decisions is concerning for additional reasons. By this logic, "exigent circumstances" could exist under any of a wide variety of federal policy choices that raise costs or create uncertainty for any group of individuals or businesses. This would not only be counter to the concept of "exigent" circumstances, but raises questions about the independence of the state statutory formula from federal government decisions.

In addition to the government shutdown, the Department refers to inflationary pressures resulting from federal government tariffs, as well as labor market pressures, as further grounds to find exigent circumstances. However, the data does not support a finding of exigent circumstances on either ground. The Consumer Price Index (CPI) for September 2025 (the most recent available data) increased by only 0.3 percent on a seasonally adjusted basis, and for all items the index rose 3.0 percent for the 12

⁸ OAG Comments at 5.

months ended September 2025.⁹ This rate of inflation is comparable to long-term CPI rates, rather than any unusual or exigent circumstance, and is far below the levels occurring in 2020-2023. Inflation is also not an indicator of consumer costs alone; inflation – along with state policy, other market drivers, and system needs (among other factors) – also affect the costs the utility incurs to safely and reliably serve customers, and contributes to the utility’s need for interim and final rate changes.

Likewise, the available data indicates that the labor market is not creating an exigency. The U.S. Bureau of Labor Statistics data illustrates that the unemployment rate across the United States remains among the lowest points in the last 20 years, at 4.3 percent as of the end of the third quarter of 2025 (the most recently available data).¹⁰ The overall unemployment rate in the wide Twin Cities area is even lower, below 4 percent in most of the region.¹¹ Similarly, average weekly wages in the Twin Cities metro area were \$1,528 versus \$1,507 nationally, with wages and salaries in the Twin Cities increasing substantially above national rates.¹²

Nonetheless, the Company recognizes that there is always a subset of its customers that struggle to afford their energy and other bills. This important but targeted policy concern does not make it reasonable or legally permissible for the Commission to modify the statutory interim-rate formula. Instead, as authorized under Minn. Stat. § 216B.16, subd. 15, such concerns are appropriately dealt with through the “establish[ment of] affordability programs for low-income residential ratepayers in order to ensure affordable, reliable, and continuous service to low-income utility customers.” Consistent with this statute, the Company has worked diligently for years to help these customers and offers a number of affordability initiatives designed to support both residential customers who qualify for assistance based on income and those who do not.¹³ We use various data sources to best identify and reach the customers who qualify for assistance, and provide those customers with their options for energy assistance. These efforts are a more appropriate way to address the very real affordability concerns for this subset of customers than a sweeping reduction to the statutory interim rate formula.

⁹ Source: U.S. Bureau of Labor Statistics (BLS), [BLS CPI Index September 2025](#). The Company’s interim rate increase for 2026 of 6.8 percent reflects increases in costs to the Company since the end of its 2024 test year, a difference over two years close to the broader industry rate of inflation of 3.0 percent per year.

¹⁰ <https://www.bls.gov/charts/consumer-price-index/consumer-price-index-by-category-line-chart.htm>

¹¹ https://www.bls.gov/regions/midwest/summary/blsummary_minneapolis.pdf

¹² *Id.*

¹³ These programs are discussed in the Company’s testimony in Volume 2 of its Initial Filing in this proceeding.

Finally, the Company notes that the Department also recommended a finding of exigent circumstances with respect to the residential class in Otter Tail Power Company's (OTP) 2025 general rate case, on largely the same grounds. Despite the common argument, OTP and Xcel Energy are differently situated in several respects. Due to the relative proportions of the companies' respective interim rate requests, Xcel Energy's Minnesota residential gas customers will see a substantially smaller net bill impact from interim rates (6.8 versus 12.6 percent), as illustrated by **Table 2** below. Additionally, the monthly residential dollar impact of Xcel Energy's as-filed interim rate proposal is lower than OTP's residential bill impact would be under the Department's proposed reduction.

Further, due to the proportion of residential customers in Xcel Energy's Minnesota gas service territory versus OTP's, **Table 2** illustrates that a 50 percent reduction in Xcel Energy's interim rates for residential customers would result in a significantly greater proportional reduction in our total interim rate revenues. Specifically, the Department's proposal would bring OTP's interim rate increase, as a percentage of revenues, from 12.6 percent to 11.0 percent on a total system basis, and from 14.1 percent to 7.0 percent on a residential basis. Xcel Energy's interim rate revenues would be reduced from 6.8 percent to 4.6 percent on total system basis, with residential revenues reduced from 7.3 percent to 3.6 percent, as illustrated below.

Table 2
Impacts of DOC Proposals

	All Classes			Residential			
	Present Rev \$M	Interim \$M	Interim %	Present Rev \$M	Interim \$M	Increase %	Res Bill Impact \$/Mo
OTP Filed Interim	\$251.9	\$31.8	12.6%	\$56.8	\$8.0	14.1%	\$13.15
OTP – Department Proposed Interim	\$251.9	\$27.8	11.0%	\$56.8	\$4.0	7.0%	\$6.58
Xcel Energy Filed Interim	\$759.9	\$51.5	6.8%	\$443.4	\$32.3	7.3%	\$5.84
Xcel Energy–Department Proposed Interim	\$759.9	\$35.3	4.6%	\$443.4	\$16.2	3.6%	\$2.92

The Company takes no position on OTP's proposals and recognizes that many factors affect a utility's interim rate proposals. However, these data points illustrate the arbitrary approach to interim rates proposed by the Department, and the disparate impacts that would result.

4. *OAG Comments*

OAG takes an approach that differs from the Department's and CUB's, suggesting that the Company's SEP Rider proposal in Docket No. G002/M-25-403 by itself creates exigent circumstances and that interim rates should therefore be no higher than the Company's SEP Rider proposal. The OAG's proposal should likewise be rejected for multiple reasons.

If accepted, the OAG's recommendation would effectively penalize the Company for proactively identifying an alternative to a fully litigated rate case, and would send the message that such an alternative proposal warrants deviating from the statutory interim-rate formula and forcibly denying recovery of a portion of the utility's prudently incurred costs. The OAG's proposal would further preclude the Company from full cost recovery under the interim rate statutory formula, while at the same time requiring the Company and all stakeholders to pursue an even more time-consuming and resource-intensive litigated rate case process. In short, the OAG's proposal is fundamentally punitive and contrary to the search for mutually agreeable, cooperative solutions.

To support its proposal, the OAG points to cases where a utility has voluntarily proposed less than full recovery of interim rates and argues that exigent circumstances give broad license for any interim rate disallowance in such circumstances. This argument is also without merit and likewise contrary to good public policy. Nothing in the Company's SEP Rider Petition is premised on (or even speaks to) exigent circumstances, nor waives the Company's statutory right to interim rates should the separately-filed rate case go forward. Put differently, the simple fact that a utility has attempted to offer a constructive proposal does not create an exigent circumstance that does not otherwise exist. As such, the Company's proposal here in no way supports a finding of exigent circumstances. The rate case is premised on full recovery of the Company's just and reasonable test year costs of service, whereas the SEP Rider Petition is a different proposal entirely. And just as the statutory formula for interim rates is not indicative of any particular final rate outcome, the Petition in no way suggests any portion of the Company's full test year costs are not prudent, just, or reasonable.

Finally, the SEP Rider Petition includes true-up mechanisms to ensure the Company ultimately recovers, and customers ultimately pay, no more or less than the Company's actually-incurred costs during the 2026 test year. The OAG's proposal to unilaterally reduce interim rates, which are not symmetrically recovered as described earlier in these Reply Comments, provides no such opportunity. The SEP Rider

Petition is offered in the spirit of avoiding a fully-litigated rate case, for the benefit of customers as described in the SEP Rider Petition and Reply Comments. Finding that exigent circumstances could be used to confiscate portions of a utility's interim rates any time a utility proactively seeks mutually beneficial alternatives, as the OAG proposes, would be punitive and discourage utilities from any such efforts in the future.

CONCLUSION

We appreciate this opportunity to respond to parties' comments on the completeness of the Company's Application. The Company respectfully requests that the Commission find the Application substantially complete, implement interim rates consistent with the Company's proposal and the statutory formula effective January 1, 2026, and refer the matter to the CAH for the contested case proceeding.

Dated: November 17, 2025

Northern States Power Company

CERTIFICATE OF SERVICE

I, Victor Barreiro, hereby certify that I have this day served copies of the foregoing document on the attached list of persons.

xx by depositing a true and correct copy thereof, properly enveloped
with postage paid in the United States mail at Minneapolis, Minnesota

xx electronic filing

DOCKET No. G002/GR-25-356

Dated this 17th day of November 2025

/s/

Victor Barreiro
Regulatory Administrator

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31	Peder	Larson	plarson@larkinhoffman.com	Larkin Hoffman Daly & Lindgren, Ltd.		8300 Norman Center Drive Suite 1000 Bloomington MN, 55437 United States	Electronic Service		No	GR-25-356
32	Annie	Levenson Falk	annief@cupminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota Street, Suite W1360 St. Paul MN, 55101 United States	Electronic Service		No	GR-25-356
33	Eric	Lipman	eric.lipman@state.mn.us		Office of Administrative Hearings	PO Box 64620 St. Paul MN, 55164-0620 United States	Electronic Service		No	GR-25-356
34	Christine	Marquis	regulatory.records@xcelenergy.com	Xcel Energy		414 Nicollet Mall MN1180-07-MCA Minneapolis MN, 55401 United States	Electronic Service		Yes	GR-25-356
35	Mary	Martinka	mary.a.martinka@xcelenergy.com	Xcel Energy Inc		414 Nicollet Mall 7th Floor Minneapolis MN, 55401 United States	Electronic Service		No	GR-25-356
36	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		No	GR-25-356
37	Kimberly	Middendorf	kimberly.middendorf@state.mn.us		Office of Administrative Hearings	PO Box 64620 600 Robert St N Saint Paul MN, 55164-0620 United States	Electronic Service		No	GR-25-356

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
38	David	Moeller	dmoeller@allete.com	Minnesota Power			Electronic Service		No	GR-25-356
39	Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP		33 South Sixth St Ste 4200 Minneapolis MN, 55402 United States	Electronic Service		No	GR-25-356
40	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		No	GR-25-356
41	David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency		220 South Sixth Street Suite 1300 Minneapolis MN, 55402 United States	Electronic Service		No	GR-25-356
42	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	GR-25-356
43	Greg	Palmer	gpalmer@greatermngas.com	Greater Minnesota Gas, Inc.		1900 Cardinal Ln PO Box 798 Faribault MN, 55021 United States	Electronic Service		No	GR-25-356
44	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	GR-25-356
45	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	GR-25-356
46	Joseph L	Sathe	jsathe@kennedy-graven.com	Kennedy & Graven, Chartered		150 S 5th St Ste 700 Minneapolis MN, 55402 United States	Electronic Service		No	GR-25-356
47	Elizabeth	Schmiesing	eschmiesing@winthrop.com	Winthrop & Weinstine, P.A.		225 South Sixth Street Suite 3500 Minneapolis MN, 55402 United States	Electronic Service		No	GR-25-356
48	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		No	GR-25-356
49	Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates		7400 Lyndale Ave S Ste 190 Richfield MN, 55423 United States	Electronic Service		No	GR-25-356
50	Suzanne	Todnem	suzanne.todnem@state.mn.us		Office of Administrative Hearings	600 Robert St N PO Box 64620 St. Paul MN, 55164 United States	Electronic Service		No	GR-25-356

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
51	Amelia	Vohs	avohs@mncenter.org	Minnesota Center for Environmental Advocacy		1919 University Avenue West Suite 515 St. Paul MN, 55104 United States	Electronic Service		No	GR-25-356
52	Joseph	Windler	jwindler@winthrop.com	Winthrop & Weinstine		225 South Sixth Street, Suite 3500 Minneapolis MN, 55402 United States	Electronic Service		No	GR-25-356