

April 16, 2024

—Via Electronic Filing—

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

RE: PETITION FOR AN AUTOMATIC BILL CREDIT PILOT PROGRAM
DOCKET NOS. E002/M-22-266 AND E002/RP-19-368

Dear Mr. Seuffert:

Northern States Power Company, doing business as Xcel Energy, submits this petition requesting Commission approval of a new Automatic Bill Credit Pilot Program designed to reduce energy burden – the share of household income spent on energy – for low-income customers.

This proposed pilot was developed with the Equity Stakeholder Advisory Group (ESAG), convened under the above-referenced dockets, and incorporates ESAG's recommendations. Our work with ESAG over the last eighteen months has focused on promoting equity across a broad range of energy programs and broadening participation in energy decisions. ESAG priorities have included reducing energy burden for low-income and Black, Indigenous and People of Color (BIPOC) customers, promoting equitable access to energy efficiency and renewable energy programs, diversifying the energy workforce, and supporting procedural justice by engaging more community voices in our decisions.

We propose a two-year pilot that would provide a monthly Automatic Bill Credit to all households in U.S. Census Block Groups across the Company's Minnesota electric service territory where electric energy burden is estimated to exceed 4 percent of median household income. The objective is to reduce energy burden based on existing and known disparities, without requiring income qualification or other program enrollment documentation. The pilot would complement and amplify the benefits of existing federal, state and utility energy assistance programs and deliver much-needed support to economically struggling households in some of the poorest areas of the Company's service territory. It would work in concert

with energy efficiency programs and workforce development programs as a holistic approach to reduce energy burden.

This Petition represents the first regulatory filing to emerge from the ESAG process. It is supported by the ESAG member organizations listed below, who along with the Company request Commission approval of this pilot as a way to explore a new approach to reduce energy burden and promote greater equity.

We have electronically filed this document with the Minnesota Public Utilities Commission, and copies have been served on the parties on the attached service lists. Please contact me at nicholas.f.martin@xcelenergy.com with any questions.

Sincerely,

NICHOLAS MARTIN
DIRECTOR, STRATEGIC OUTREACH & ADVOCACY
XCEL ENERGY - MINNESOTA, NORTH DAKOTA AND SOUTH DAKOTA

Equity Stakeholder Advisory Group members supporting this petition:

TERRY AUSTIN
DIRECTOR OF COMMUNITY ENGAGEMENT
NORTHSIDE ECONOMIC OPPORTUNITY NETWORK

ANJALI BAINS
MANAGING DIRECTOR, TRANSPORTATION
EQUITABLE POLICY AND AFFORDABILITY CONSULTANT
FRESH ENERGY

SHUBHA HARRIS
EQUITABLE POLICY AND AFFORDABILITY CONSULTANT
FRESH ENERGY

ROBERT BLAKE
EXECUTIVE DIRECTOR
NATIVE SUN COMMUNITY POWER DEVELOPMENT

ENRIQUE BLANCO
DIRECTOR OF OPERATIONS
LATINO ECONOMIC DEVELOPMENT CENTER

CARMEN CARRUTHERS
OUTREACH DIRECTOR
CITIZENS UTILITY BOARD OF MINNESOTA

TIMOTHY DENHERDER-THOMAS
GENERAL MANAGER
COOPERATIVE ENERGY FUTURES

METRIC GILES
CO-DIRECTOR
COMMUNITY STABILIZATION PROJECT

EMILIA GONZALEZ AVALOS
EXECUTIVE DIRECTOR
UNIDOS MN

MATT KAZINKA, SENIOR STRATEGIC INITIATIVES MANAGER
LAKE STREET COUNCIL

MARKEETA KEYES
GREEN CAREERS WORKFORCE DIRECTOR
CITY OF MINNEAPOLIS

KIM HAVEY
SUSTAINABILITY DIRECTOR
CITY OF MINNEAPOLIS

ISAAC EVANS
SUSTAINABILITY PROGRAM COORDINATOR
CITY OF MINNEAPOLIS

AUGUSTINE KIETZER
PROGRAM DIRECTOR, PATHWAYS TO CAREERS
DUNWOODY COLLEGE OF TECHNOLOGY

MARY LAGARDE
EXECUTIVE DIRECTOR
MINNEAPOLIS AMERICAN INDIAN CENTER

ALICE MADDEN
ENERGY DEMOCRACY STAFF
COMMUNITY POWER

MARCUS MILLS
DIRECTOR OF POLICY AND GOVERNMENT AFFAIRS
BLACK VISIONS

PATTY O'KEEFE
SENIOR FIELD STRATEGIST, BUILDING ELECTRIFICATION AND BEYOND COAL
CAMPAIGNS
SIERRA CLUB NORTH STAR CHAPTER

JONATHAN PALMER
PRINCIPAL
NONPROFIT HEROES FOR HIRE, LLC
(FORMERLY EXECUTIVE DIRECTOR, HALLIE Q. BROWN COMMUNITY CENTER)

AUDREY PARTRIDGE
DIRECTOR OF POLICY
CENTER FOR ENERGY & ENVIRONMENT

KEVIN PRANIS
MARKETING MANAGER OF GREAT LAKES REGIONAL ORGANIZING COMMITTEE
LABORERS INTERNATIONAL UNION OF NORTH AMERICA (LIUNA) - MN AND ND

SANDRA PYLES
DIRECTOR, ENERGY ASSISTANCE PROGRAMS
COMMUNITY ACTION PARTNERSHIP OF RAMSEY & WASHINGTON COUNTIES

SCOTT REDD
CHIEF EXECUTIVE OFFICER
SABATHANI COMMUNITY CENTER

GEORGE SHARDLOW
EXECUTIVE DIRECTOR
ENERGY CENTS COALITION

JAMEZ STAPLES
PRESIDENT & CEO
RENEWABLE ENERGY PARTNERS

RUSS STARK
CHIEF RESILIENCE OFFICER
CITY OF SAINT PAUL

THAOMEE XIONG
EXECUTIVE & NETWORK DIRECTOR
COALITION OF ASIAN AMERICAN LEADERS

The following State of Minnesota agencies participated in the ESAG process that took place from September 2022 through March 2024. While not taking a position on the Petition itself at this time, we wish to signal our support for the broadly inclusive nature of the ESAG process and its effort to center equity and bring a broad range of community voices into the design of new energy programs. We look forward to participating in the Commission's consideration of this Petition via the forthcoming regulatory proceeding.

DONALD HIRASUNA
RATES ANALYST
MINNESOTA DEPARTMENT OF COMMERCE

TRAVIS MURRAY
ASSISTANT ATTORNEY GENERAL, RESIDENTIAL UTILITIES DIVISION
OFFICE OF THE MINNESOTA ATTORNEY GENERAL

AMANDA JARRETT SMITH
CLIMATE UNIT SUPERVISOR
MINNESOTA POLLUTION CONTROL AGENCY

KATHERINE TEIKEN
CLIMATE POLICY DIRECTOR, POLICY AND COMMUNITY DEVELOPMENT
MINNESOTA HOUSING

Enclosures
cc: Service List

STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION

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

IN THE MATTER OF EFFORTS TO
ADVANCE WORKFORCE DIVERSITY,
INCLUSIVE PARTICIPATION, AND
EQUITABLE ACCESS TO UTILITY SERVICES
FOR XCEL ENERGY

DOCKET NOS. E002/M-22-266 AND
E002/RP-19-368

PETITION

INTRODUCTION

Northern States Power Company, doing business as Xcel Energy, submits this petition to the Minnesota Public Utilities Commission requesting approval of a new pilot program to reduce energy burden – the share of household income spent on energy – for low-income customers. The proposed pilot would provide an Automatic Bill Credit to households in identified areas of high energy burden, using mapping tools to identify those areas, without additional household-level income qualification requirements. This proposal is the result of work with the Equity Stakeholder Advisory Group (ESAG) in the above-referenced dockets over the past 18 months, and incorporates the group’s recommendations. The proposal is supported by the ESAG member organizations listed as signatories to the cover letter.

We propose a two-year pilot program in which a monthly electric bill credit would be provided to all households in U.S. Census Block Groups (CBGs) across the Company’s Minnesota electric service territory where electric energy burden is estimated to exceed 4 percent. A threshold of 4 percent results in 77 eligible CBGs and about 23,000 households who would receive the bill credit. The annual bill credit per customer would vary by CBG, averaging approximately \$458 a year. The estimated annual cost of bill credits is about \$5.4 million. We propose to recover the costs of this two-year pilot using a portion of the U.S. Department of Energy settlement payments.

The pilot objective is to reduce energy burden based on existing and known disparities, without requiring income qualification or other program enrollment

documentation. Simplicity is the focus here. If successful, the pilot could be made permanent and/or expanded. As proposed, the pilot will complement and amplify the benefits of existing federal, state and utility energy assistance programs; deliver much-needed support to economically struggling households in some of the poorest areas of the Company's service territory; and work in concert with energy efficiency programs and workforce development programs as a holistic approach to reduce energy burden.

I. BACKGROUND

A. ESAG generally

Xcel Energy convened the ESAG pursuant to the Commission's Order in Docket Nos. E002/M-22-266 and E002/RP-19-368. That Order, among other requirements, directs the Company to consult with ESAG on how to "design for the equitable delivery of electricity services and programs for energy burdened customers" and "adopt practices in furtherance of procedural justice – including deeper engagement with renters; affordable rental property owners; communities of Black, Indigenous, and People of Color; and under-resourced individuals."

Xcel Energy met with the ESAG approximately monthly, sixteen times in all, from September 2022 through March 2024. ESAG is composed of representatives of approximately 35 organizations, including BIPOC community-based organizations, Native organizations, low-income advocates, workforce development and training organizations, energy efficiency implementers, solar developers, labor advocates, the cities of Minneapolis and Saint Paul, and several state agencies.

Consistent with the Order language, our goal in ESAG has been to enhance equity in a broad range of energy programs, including but not limited to reducing energy burden for low-income customers – the focus of this proposed pilot. In terms of process, our goal has been to support procedural justice by broadening participation, particularly by organizations representing the Company's low-income and BIPOC customers who have not often participated in Commission proceedings, in the energy decisions that impact them. This pilot reflects that goal, having been designed in collaboration with a broad range of community groups, many of whom have never before participated in a Commission proceeding.

B. Genesis of the pilot

Our discussions in ESAG have focused on three core priorities, or “workstreams”:¹

1. Reducing energy burden for low-income and BIPOC customers
2. Workforce and supplier diversification
3. Equitable access to renewable energy

In each work stream, ESAG followed a stepwise process facilitated by Center for Economic Inclusion² that included: developing a consensus issue statement, understanding root causes, brainstorming strategies, prioritizing strategies through voting, and developing the details of a potential new program or approach to advance the top-ranked strategy(ies). In workstream 1, ESAG members initially proposed a large number of possible strategies to reduce energy burden for low-income and BIPOC customers. We then conducted a ranked-choice voting exercise to prioritize these strategies, the result of which is shown below.

As Figure 1 shows, one strategy received by far the most uniform support from ESAG: strategy 1a, Automatic Discount, more fully described as *Implement automatic discount to low-income customers using self-declaration of income or geographic proxy*.³

To develop strategy 1a, we worked with ESAG in facilitated full-group and small-group discussions over several months. We worked to reach consensus on the overall objectives, eligibility criteria, targeted reduction in energy burden, interaction with existing energy assistance programs, delivery mechanics, and various other design and implementation questions. This Petition reflects those discussions.

Before describing the proposed pilot, we draw attention to three overriding themes of our discussions on energy burden. These are worth highlighting as learnings from ESAG because, in addition to informing our approach to this pilot, they have been recurring themes in the other ESAG work streams as well.

¹ For more detail on these ESAG work streams, see Northern States Power Company, doing business as Xcel Energy, ANNUAL REPORT filed December 29, 2023. Docket Nos. E002/M-22-266 (*In the Matter of Efforts to Advance Workforce Diversity, Inclusive Participation, and Equitable Access to Utility Services for Xcel Energy*) and E002/RP-19-368 (*In the Matter of the 2020–2034 Upper Midwest Integrated Resource Plan of Northern States Power Company d/b/a Xcel Energy*).

² See [Center for Economic Inclusion](#).

³ Note that while we retain here the “Automatic Discount” language used in our initial voting, in the remainder of this Petition we use the more precise language “Automatic Bill Credit” to reflect that the mechanism for reducing energy burden would be a bill credit, specifically a credit on the electric portion of eligible customers’ monthly bills, not a discounted rate per kWh.

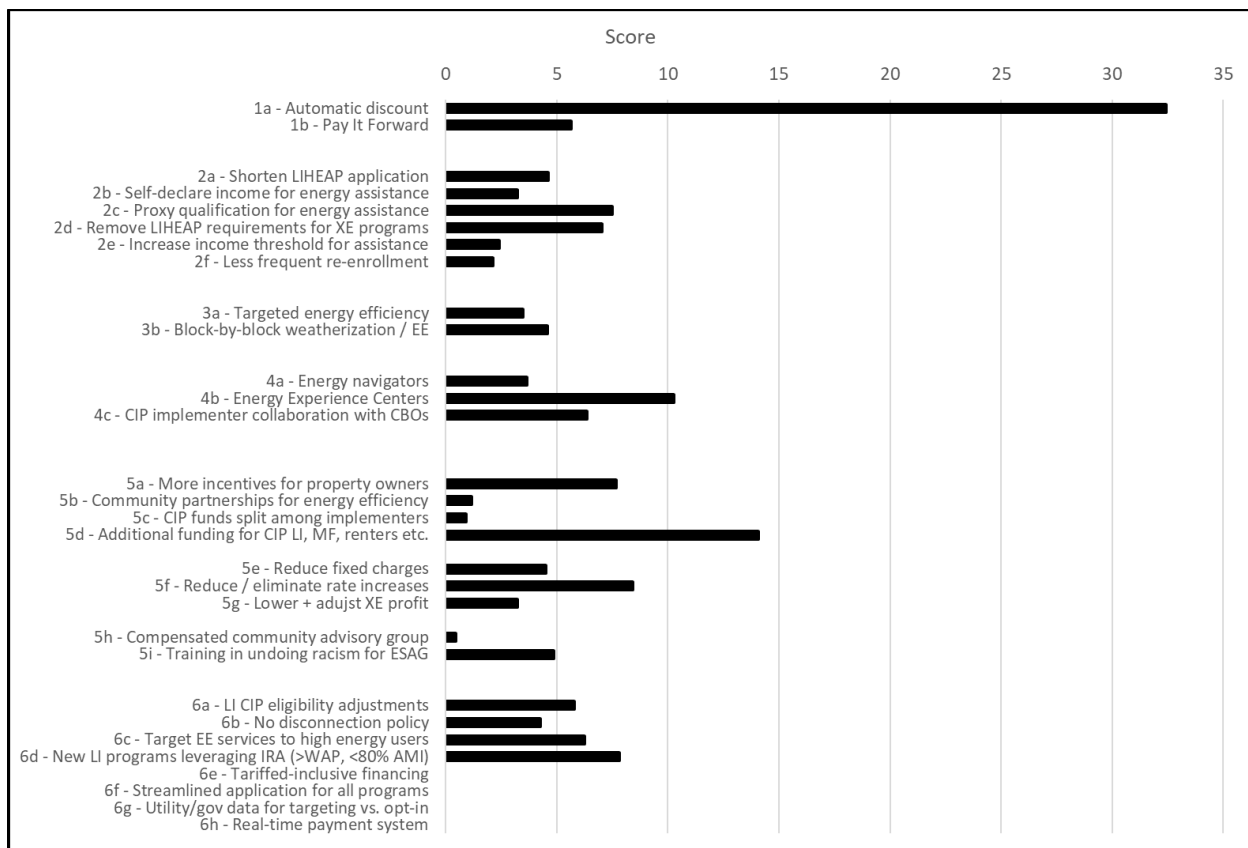


Figure 1. Results of ranked-choice voting by ESAG to prioritize strategies to reduce energy burden for low-income and BIPOC customers.

Theme 1: Make it as easy as possible to take advantage of energy programs. ESAG members emphasized that existing energy assistance programs, while very important to those they serve, only reach a small proportion of those who are eligible for and in need of assistance. This is true of both federally funded, state-administered energy assistance programs and utility-funded programs. For example, anecdotal evidence suggests that around 20 percent of those whose incomes would make them eligible for federal Low Income Home Energy Assistance Program (LIHEAP) assistance actually receive it. This is likely for multiple reasons, but one important factor according to ESAG members is that the LIHEAP income qualification and program enrollment requirements are perceived as overly burdensome, invasive, or shame-inducing by many potential recipients. The programs in effect ask those in society who are already most burdened by poverty and other challenging life circumstances to take on additional burdens to receive assistance. Certainly, efforts are underway – including by ESAG members like the Minnesota Department of Commerce, Community Action Partnership of Ramsey & Washington Counties, and others – to streamline enrollment and reduce these burdens. Likewise, the Commission’s recent (February and March 2024) planning meetings with utilities and public assistance organizations

have focused on, among other themes, ways to streamline access to energy assistance programs. In 2023, the Company began an auto enrollment process for our PowerON and Gas Affordability Programs, eliminating a separate application for our customers who have been approved through LIHEAP. These efforts are all helpful, but more remains to be done. ESAG urged the Company, in designing any new program, to find ways to make enrollment as easy as possible.

Theme 2: Use mapping tools to target assistance. There are an increasing number of mapping tools – from state government, federal government, and others – that identify areas where disparities exist in income, wealth, housing, health, and other variables due to historical and ongoing discrimination. These maps are designed for various purposes: to assess electricity metrics like reliability, disconnections, and low-income program participation,⁴ to evaluate energy burden,⁵ to identify “environmental justice” areas with disproportionate exposure to pollution,⁶ and to identify areas to target for federal or other investments.⁷ While differing in purpose, a common objective of these tools is to identify areas facing marginalization or underinvestment, then use mapping to better target the delivery of programs or investments. ESAG has suggested: since we know from the maps where poverty is concentrated, can we use them to efficiently deliver assistance without requiring already heavily burdened people to take on additional burdens to receive it?

Theme 3: Take a holistic approach. ESAG members emphasized to us that a bill credit, while urgently needed by some, provides only short-term relief; it does not reduce long-term energy costs or increase incomes. High energy burden is the result of both energy costs (the numerator) and incomes (the denominator). ESAG urged the Company to approach energy burden holistically by providing short-term bill relief (this proposed pilot), increasing access to energy efficiency to reduce long-term energy costs, and increasing incomes by providing pathways into well-paying energy careers. This pilot is only the first step in that holistic approach. We hope to bring forward additional efforts to increase energy efficiency program participation in high energy

⁴ See for example the Xcel Energy Minnesota Electric Service Quality Interactive Map at [ArcGIS Web Application](#).

⁵ Examples include the U.S. Department of Energy’s Low-Income Energy Affordability Data tool at [LEAD Tool | Department of Energy](#), as well as the new energy burden map developed for this proposed pilot program.

⁶ Examples include the Minnesota Pollution Control Agency’s environmental justice map at [Understanding environmental justice in Minnesota \(arcgis.com\)](#), the U.S. Environmental Protection Agency’s Environmental Justice screening tool at [EJScreen \(epa.gov\)](#), and the Council on Environmental Quality’s Climate and Economic Justice Screening Tool at [Explore the map - Climate & Economic Justice Screening Tool \(geoplatform.gov\)](#).

⁷ See for example the U.S. Department of Energy’s Energy Justice Mapping Tool at [Energy Justice Dashboard \(anl.gov\)](#).

burden areas, and we continue to expand efforts to diversify our workforce, increase procurement from diverse suppliers, and create pathways into energy careers.

II. PROPOSED PILOT

We propose a two-year pilot program in which a monthly bill credit would be provided to all households in U.S. Census Block Groups (CBGs) across the Company's Minnesota electric service territory where electric energy burden is estimated to exceed 4 percent. The pilot objective is to reduce energy burden based on existing and known disparities, without requiring income qualification or other program enrollment documentation. If successful, the pilot could be made permanent and/or expanded. While simplicity – both for recipients and in program administration – is the focus here, we discuss at the end of this proposal some ways the program could evolve over time to use more specific targeting approaches.

A. Mapping Energy Burden by U.S. Census Block Group

Energy burden is defined as the percentage of gross household income spent on energy bills, including electricity and heating but not including transportation energy. A commonly accepted metric is that energy burden greater than 6 percent is considered High, while greater than 10 percent is considered Severe.⁸ Nationwide, median energy burden is about 3.1 percent, but can be significantly higher for certain groups including People of Color, Native Americans, low-income people, older adults, renters, people living in manufactured homes, people living in homes built before 1980, and others.⁹ According to the U.S. Department of Energy's Low-Income Affordability Data (LEAD) Tool, statewide average energy burden in Minnesota is about two percent – but again, can be higher for people with lower incomes, living in older homes, renters, and others.¹⁰

For this pilot, the Company wanted to use the most specific data available, based on Xcel Energy-specific energy bills, combined with U.S. Census data on income. We began with our existing, publicly accessible Minnesota Electric Service Quality Interactive Map.¹¹ That map does not address energy burden but has underlying demographic data layers that can be used for that purpose. Those data layers, from the U.S. Census American Community Survey, include median household income,

⁸ See [Low-Income Community Energy Solutions | Department of Energy](#) and Dreihobl, A., L. Ross, and R. Ayala. 2020. *How High Are Household Energy Burdens?* Washington, DC: American Council for an Energy-Efficient Economy, available at [Energy Burden Research | ACEEE](#).

⁹ ACEEE *How High Are Household Energy Burdens?* See figure ES1 on page iv.

¹⁰ See Minnesota data in [LEAD Tool | Department of Energy](#).

¹¹ See [Xcel Energy MN Electric Service Quality Interactive Map \(arcgis.com\)](#).

poverty rate, and percentage of People of Color at the CBG level. CBGs are a geographical unit used by the United States Census Bureau, representing the smallest area for which the Census Bureau publishes decennial sample data, typically with a population of 600 to 3,000 people.¹²

Building on those demographic data layers, we worked with the Company's customer insights and geospatial analysis teams to create a new energy burden data layer. We sought to estimate energy burden at the CBG level throughout our Minnesota service territory.

For this pilot, we decided to focus on electric energy burden, rather than overall (electric + natural gas or other heating fuel) energy burden, for two reasons. First, Xcel Energy is not the natural gas provider in Minneapolis and other areas, and we wanted to design a pilot that could be available across Minneapolis, Saint Paul, and other parts of our Minnesota electric service territory. A future evolution of the pilot could consider overall energy burden, as discussed in section II.K below. Second, in many areas of concentrated poverty there is a significant amount of rental housing, and in rental housing electricity use is most often individually metered to the housing unit and paid for by the tenant, whereas gas is often metered to the building as a whole and included in the rent. In rental housing, a bill credit targeting electric energy burden would flow directly to the tenant as a savings, whereas this is much more difficult to ensure in the case of a gas bill credit. Since we focused on electric energy burden only, we set the threshold for receiving a bill credit significantly lower than the 6 percent considered High for overall energy burden; see the next section.

To create the electric energy burden data layer, we compiled data on electric revenues over the last 12 months for each individual premise in the Company's Minnesota electric service territory, using the latest available billing data.¹³ We then aggregated this data up to the CBG level using the geographic identifiers for each premise. We then divided total electric revenues from all premises within each CBG, by the number of premises served in that CBG, to derive an estimate of the average annual electricity cost per premise for that CBG. Finally, we divided average annual electricity cost per premise by the CBG-specific median household income from the U.S.

¹² See [Ch11GARM.pdf \(census.gov\)](#) and [Census block group - Wikipedia](#).

¹³ For premises where less than a full year of billing data was available, we extrapolated to a full year. We evaluated how the distribution of electric revenues is impacted when there are missing days, and found that the shapes of the distributions are sufficiently similar across different numbers of missing days to support the extrapolation to 365 days.

Census data, giving an estimate of annual average electric energy burden by CBG.¹⁴ This represents, in effect, the average electric energy burden for the median-income household in each CBG.

Figure 2 shows a snapshot of this new energy burden data layer. The area shown is the core Metro, including Minneapolis, Saint Paul, and surrounding areas. Each polygon is a CBG. The shading (see legend at right) represents ranges of estimated electric energy burden at the CBG level, ranging from 0-2 percent (lightest color) to >8 percent (darkest color). Most CBGs in this snapshot are in the 0-2, 2-4, or 4-6 percent ranges, with just a few in 6-8 percent or greater than 8 percent.

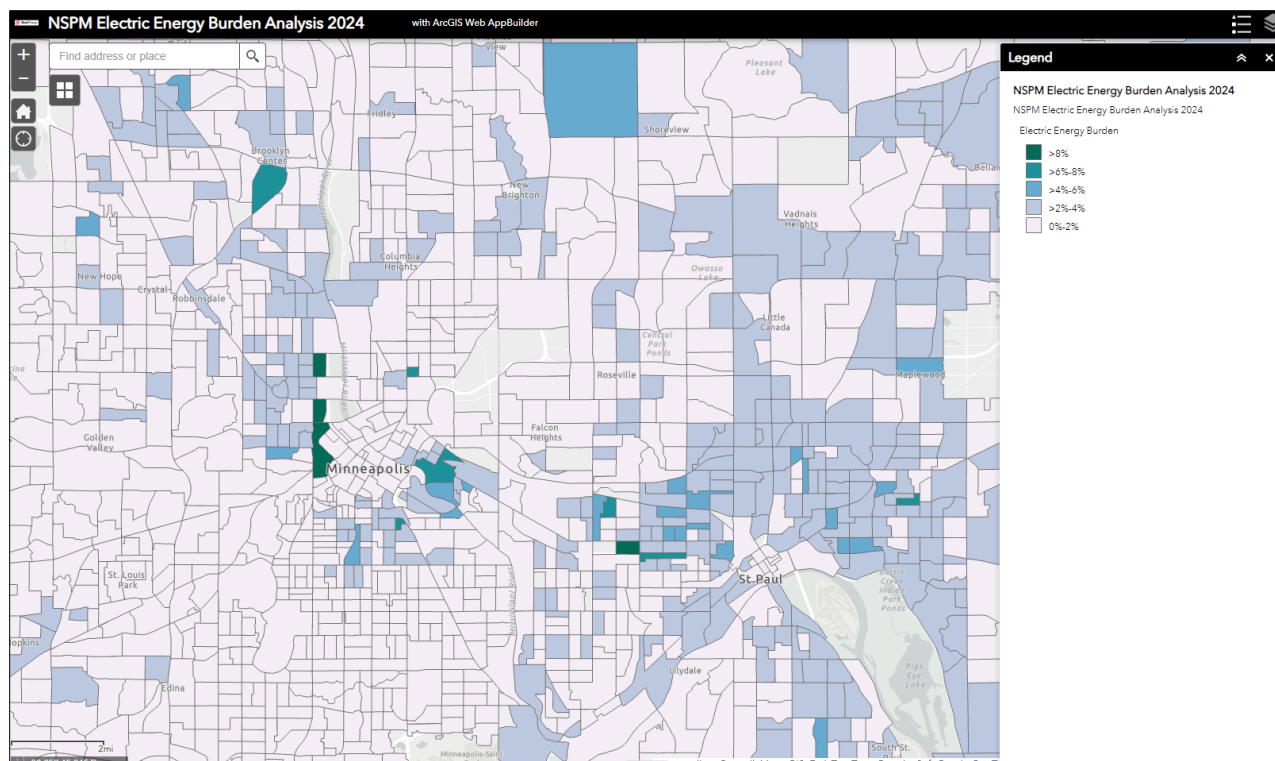


Figure 2. Snapshot of energy burden data layer, showing downtown Minneapolis, Saint Paul and surrounding areas.

B. Choosing a Metric to Identify Eligible CBGs

We next had to choose a metric, and a threshold for that metric, to decide which CBGs to include in the pilot. We discussed with ESAG two possible metrics: poverty rate by CBG and electric energy burden by CBG. A poverty-based metric initially seems most straightforward: simply offer a bill credit to households in all CBGs

¹⁴ For a small number of CBGs where median household income data was missing, we used the median household income for the Census tract (a larger area containing several CBGs) in which the CBG with missing median income data was located.

where more than an agreed percentage of households are living below an agreed poverty threshold. Indeed, the U.S. Census data provides a basis for this: it includes median household income by CBG, as well as the proportion of households in each CBG living at or below 185 percent of the federal poverty level.

However, ESAG members pointed out that a poverty-based metric, while straightforward, would not directly address the issue of concern – energy burden. For example, consider two households: one a small household, living in a relatively new and efficient home and using relatively little energy, so having a relatively low monthly energy cost; the other a large household, living in an old and poorly insulated home with high energy use. These two households could have exactly the same income, but the second one would have much higher energy burden.

The consensus of ESAG was that a pilot program designed to reduce energy burden should use energy burden as the metric for eligibility. This metric, albeit better suited to the objective, is somewhat more challenging to calculate because it requires information on households' incomes as well as their energy costs. Xcel Energy does not have income data for most of our customers; we only have that data for those enrolled in income-qualified programs by the Minnesota Department of Commerce – who, as discussed above, may be only a small proportion of those eligible for and in need of energy assistance. This pilot inherently aims to go beyond those programs. So, we used U.S. Census data on median income, as described in the prior section.

We next had to select a threshold of CBG-level electric energy burden that would be used to choose eligible CBGs. We evaluated various thresholds, including 3 percent (half the overall energy burden considered High by the American Council for an Energy Efficient Economy¹⁵) and 4 percent. A threshold of 3 percent resulted in 190 eligible CBGs and about 68,000 households that would receive a bill credit – far larger than a typical pilot designed to test new approaches. A threshold of 4 percent resulted in 77 eligible CBGs and about 23,000 households – still large for a pilot, but with a reasonable annual cost (discussed further below), and we think a meaningful population to test this concept. We propose using 4 percent electric energy burden as the threshold for this pilot. Future evolution of the pilot could test other thresholds.

C. Size of the Bill Credit

Having chosen the metric and threshold to determine eligible CBGs, we next had to determine the size of the bill credit that households in each eligible CBG would receive. The objective was a bill credit that would reduce electric energy burden in

¹⁵ See footnote 8.

CBGs where it is greater than or equal to 4 percent, to approximately that threshold, on an annual basis.

Because a key goal of the pilot is to test eliminating income qualification, the pilot will collect no household-specific income information. This means the bill credit cannot be calculated as the amount needed to reduce a specific household's electric energy burden to the threshold – as is done in Xcel Energy's PowerON program and other programs that require household-specific income qualification – but rather a more generalized, CBG-level target. We calculated a target annual electric bill for each qualifying CBG by multiplying median household income for the CBG by 4 percent.

Calculating the bill credit needed in each CBG is then simply a matter of subtracting the target annual electric bill from the average annual electricity cost per premise, both calculated at the CBG level. This difference equals the bill credit that must be provided to ensure the median-income household in that CBG pays only 4 percent of its income for electricity. The bill credit will differ from one CBG to the next, since it is based on CBG-specific median household income, but will be the same for all households in a given CBG.

D. Balancing Possible “Over-inclusion”

Household incomes and energy burden vary within any CBG. Under this pilot, within qualifying CBGs there will be households with lower electric energy burden than the targeted threshold of 4 percent, who will still receive a bill credit. We refer to this using the shorthand “over-inclusion,” so as not to imply anything about households' degree of need for assistance. Similarly, within CBGs that do not qualify for the pilot – because CBG-level median incomes are higher and energy burden lower – there could be households with electric energy burden exceeding 4 percent who will not receive a bill credit. The only way to avoid any over- or under-inclusion would be to go back to household-specific income data collection. But this would reintroduce potentially onerous enrollment requirements that have acted as a barrier to many families seeking assistance for which they are eligible.

We discussed at length with ESAG the pros and cons of allowing over-inclusion. The consensus of ESAG was that for the purposes of an initial pilot, the degree of over-inclusion is likely small, and advantages of allowing a small amount of over-inclusion outweigh the disadvantages of having to identify, enroll, and verify income by household. ESAG members advanced various arguments for this. First, some households that receive a bill credit despite having actual electric energy burden below 4 percent might still be living in or near poverty. Helping households with income slightly above the poverty level may help prevent them from slipping into poverty,

which is more cost-effective than addressing poverty after it occurs. Second, supporting mixed-wealth living may provide a net societal benefit by reducing transience, improving social cohesion, and supporting community stability. Third, providing a bill credit to an entire CBG rather than only selected households may be viewed as a community-level investment, where everyone in the community benefits. Fourth, balancing a program's design and/or reach with its administrative costs is a key challenge for any assistance program, and a key strength of this proposed pilot is low administrative costs. Household-by-household income verification, while it could avoid over-inclusion, entails significant administrative costs for utilities and supervisory agencies (aside from its time burden on recipients), and the administrative cost savings of eliminating those requirements will offset at least some of the costs of providing a bill credit to some households who would be ineligible in a household-by-household approach.

Finally, ESAG members noted that tolerance for “over-inclusion” is not without precedent in utility programs. For example, some multifamily building energy efficiency programs intended to help low-income customers require a minimum percentage of the building tenants to be low-income, but the improvements to the building also reduce bills for tenants who are not low-income.

Considering all this, ESAG's recommendation was to begin with the simplest approach: provide a bill credit to all households in qualifying CBGs without attempting to eliminate over-inclusion. This would enable the pilot to get started, monitor success, and evolve over time. ESAG, however, suggested that the pilot should provide an “opt-out” option so that, for example, a wealthier household located within an overall high energy burden CBG could decline the bill credit if they choose. ESAG members felt this granted individual households the dignity to decide for themselves whether they wanted the bill credit.

ESAG also suggested that once the advantages of a simple approach have been explored in the pilot, the Company could consider gradually reintroducing more targeted, household-specific income checks, as long as this could be done without overly increasing enrollment barriers or administrative costs. This is discussed further in section II.K.

E. Pilot Program Mechanics

Basic approach. All households in CBGs with estimated electric energy burden greater than or equal to 4 percent would receive a monthly bill credit calculated as the amount needed to reduce annual electric energy burden to 4 percent for the median-income household in that CBG. The bill credit will vary from one CBG to the next, since it is

based on CBG-specific median income, but will be the same for all households in a given CBG (except for households that have opted out of receiving it).

Term. We propose a two-year pilot, which we believe is a reasonable length of time to explore this new approach. The analysis of eligible CBGs and calculation of bill credits – which the Company did for this proposal using the latest available electric bill data and U.S. Census income data – would be recalculated upon Commission approval before the start of the pilot. Those CBGs and households would then continue to receive a bill credit for two years. We believe this length of time is appropriate to be able to evaluate the pros and cons of the pilot approach. An alternative would be to recalculate energy burden and CBG eligibility at the midpoint of the two-year pilot, which could lead to some CBGs becoming ineligible and others becoming eligible in year two. The Company is open to that alternative, but we believe any advantages it may have are outweighed by what could be learned by evaluating the effects of the pilot on the same households over a two-year period.

Monthly bill credits. Electric energy burden is not constant throughout the year; it could, for example, be higher in the summer months if a household has air conditioning. However, we propose not to vary the CBG eligibility testing or size of the bill credit by month. These calculations would be performed once, as proposed above, and then the monthly bill credit will simply be 1/12th of the annual credit needed to reduce electric energy burden to 4 percent for the median-income household. Recalculation of energy burden each month would add significant complexity, potentially causing CBGs to move in and out of eligibility, resulting in households not knowing whether to expect a bill credit from one month to the next. We think this would lead to customer confusion and frustration, and that a simple, predictable bill credit is preferable for customer satisfaction.

Delivery mechanism. Upon Commission approval and updating of the electric energy burden analysis, the Company's billing department would be provided a list of all premise numbers in CBGs where electric energy burden exceeds the 4 percent threshold, along with the monthly bill credit amount by CBG needed to reduce electric energy burden to 4 percent for the median-income household. Those premise numbers would be scheduled to begin receiving an Automatic Bill Credit as soon as feasible, and would continue receiving this monthly for the two-year pilot.

Outreach. Customer outreach will be important for this pilot so that households know they are receiving a new bill credit, why they are receiving it, that the bill credit is initially a limited-term pilot, and to encourage customers to sign up for other energy assistance and energy efficiency programs. ESAG members suggested bill inserts or electronic messaging might not be sufficient, and that the Company should explore

ways to get the message out via trusted community-based organization (CBO) partners. Many CBOs – including ESAG members, but also many neighborhood associations, district councils, and others – have newsletters, message boards, and regular community events. The Company appreciates this suggestion. If the pilot is approved, we propose to work with ESAG members and other CBOs to disseminate information on the pilot and the new credit customers may begin to see on their electricity bills. The Company is already increasing our attendance by tabling at relevant community events, and last year launched a Resources Education Delivered (RED) Truck initiative in Colorado that may be replicated in Minnesota.¹⁶ In the meantime, RED Truck-branded events are taking place in Minnesota, and bring similar services to community events to help households with on-the-spot bill assistance, program signups, answering customers’ questions, etc. These could be another useful channel for outreach on the Automatic Bill Credit pilot.

Opt-out option. ESAG members felt it was important to offer an opt-out option for households that are in a CBG that qualifies, but who do not wish to receive a bill credit for any reason. Households in the qualifying CBGs would be asked via e-mail, bill insert, and/or the above CBO-based outreach if they prefer to opt out of the pilot program. Plans are in development for how opt-out requests will be received and processed.

Missed payments. ESAG members inquired whether customers who miss payments would continue to receive a monthly bill credit. In some existing energy assistance programs, a customer who misses more than two payments is unenrolled. However, in this pilot we propose that customers would continue receiving an Automatic Bill Credit unless they are disconnected or move out of an eligible CBG. The justification for a different approach here is that in a learning pilot, allowing non-paying households to continue to receive the monthly bill credit would provide an opportunity to evaluate whether doing so might positively influence payment behavior or reduce disconnections.

Relocation. ESAG members asked about relocation: could the Company provide a mechanism for a household’s bill credit to “follow” them if they move? We believe not, since the bill credit would be tied to a premise number within a qualifying CBG, not to the resident. The next residents moving into that premise would automatically receive the credit. The residents moving out would receive a bill credit if they move into another CBG that qualifies, but would not receive the credit if they move into a non-qualifying CBG.

¹⁶ See “RED Truck revs up: Resources and solutions delivered to customers,” at [Xcel Energy · Between the Lines](#).

F. “Layering” with Other Energy Assistance Programs

Another topic of discussion in ESAG was whether “layering” of energy assistance should be allowed: specifically, whether the Automatic Bill Credit should be provided to all households in an eligible CBG, even if some of them already receive other energy assistance – a LIHEAP-funded energy assistance grant, a PowerON credit, Medical Affordability, a Low-Income Low Usage program credit, etc. – or should only be provided to households currently receiving no energy assistance.

ESAG discussed the pros and cons of allowing layering. Arguments for allowing layering were, first, that customers are currently eligible to participate in multiple state and utility energy assistance programs. Second, households receiving energy assistance are often facing significant economic challenges; allowing them to receive the Automatic Bill Credit on top of other assistance would mean putting more money back in their wallet for non-energy essentials (groceries, healthcare, caregiving for an elder, etc.). Energy assistance is not meant as a zero-sum game. Second, if layering were not allowed, households would have to choose which program to participate in, and deciding which is most beneficial creates an additional challenge for households. Fourth, allowing layering would avoid the added administrative cost of identifying households in the eligible CBGs who receive other assistance in order to remove them from the list of premises to receive the Automatic Bill Credit.

The argument against layering is essentially that funding for energy assistance programs is finite, and in the case of utility programs, is generally provided by a surcharge levied on non-participant customers. All else equal, allowing a household that already receives assistance under a utility-funded program to receive the Automatic Bill Credit would mean there is that much less money to assist another household that may not receive such assistance.

ESAG’s consensus recommendation was to allow layering for the two-year pilot. ESAG members noted this would keep the pilot administratively simpler, thereby reducing program costs. More importantly, most in ESAG believed that if the core objective of the pilot is to see what learnings can emerge from an experimental approach to reducing energy burden, it is better to reduce energy burden more deeply for a smaller number of households, than to reduce burden less but for a larger number.

We propose, however, that the Automatic Bill Credit should not cause a customer’s bill to become negative (i.e., a refund). In the event receiving the Automatic Bill Credit on top of other discounts or bill credits already received would cause a

customer's electricity bill to go below zero, the Automatic Bill Credit will be limited to what would result in a zero bill.

G. Hypothetical Household Example

During our discussions with ESAG, members requested a hypothetical example for a household receiving the Automatic Bill Credit, to aid in understanding the mechanics of the pilot. We provide an example here.

For the illustration we assume a hypothetical household in Census Block Group 4 of Census Tract 1016, Hennepin County. This CBG is located in North Minneapolis. Based on the U.S. Census American Communities Survey for 2018-2022, median household income in this CBG is \$12,488. Of the total population of 1,533 people residing in this CBG, 88 percent are people of color and 80 percent are living at or below 185 percent of the federal poverty level. Xcel Energy provides electric service to 307 premises in this CBG. The estimated electric energy burden for this CBG is 9.61 percent – well above the threshold, and clearly a heavily energy burdened CBG. All 307 premises in this CBG would qualify to receive an Automatic Bill Credit.

For simplicity, we assume our hypothetical household is the *median* household in this CBG – that is, it has exactly the CBG median income of \$12,488 and exactly the median electric energy burden of 9.61 percent. That means this household is paying \$1,200 per year for electricity (9.61 percent of \$12,488). The household's target annual electric bill is \$499 (4 percent of \$12,488). A bill credit of \$701 per year, or \$58 per month,¹⁷ is needed to reduce their annual electric bill to \$499.

¹⁷ As noted above, for reasons of simplicity and customer satisfaction we propose not to vary the Automatic Bill Credit by month during the initial two-year pilot.

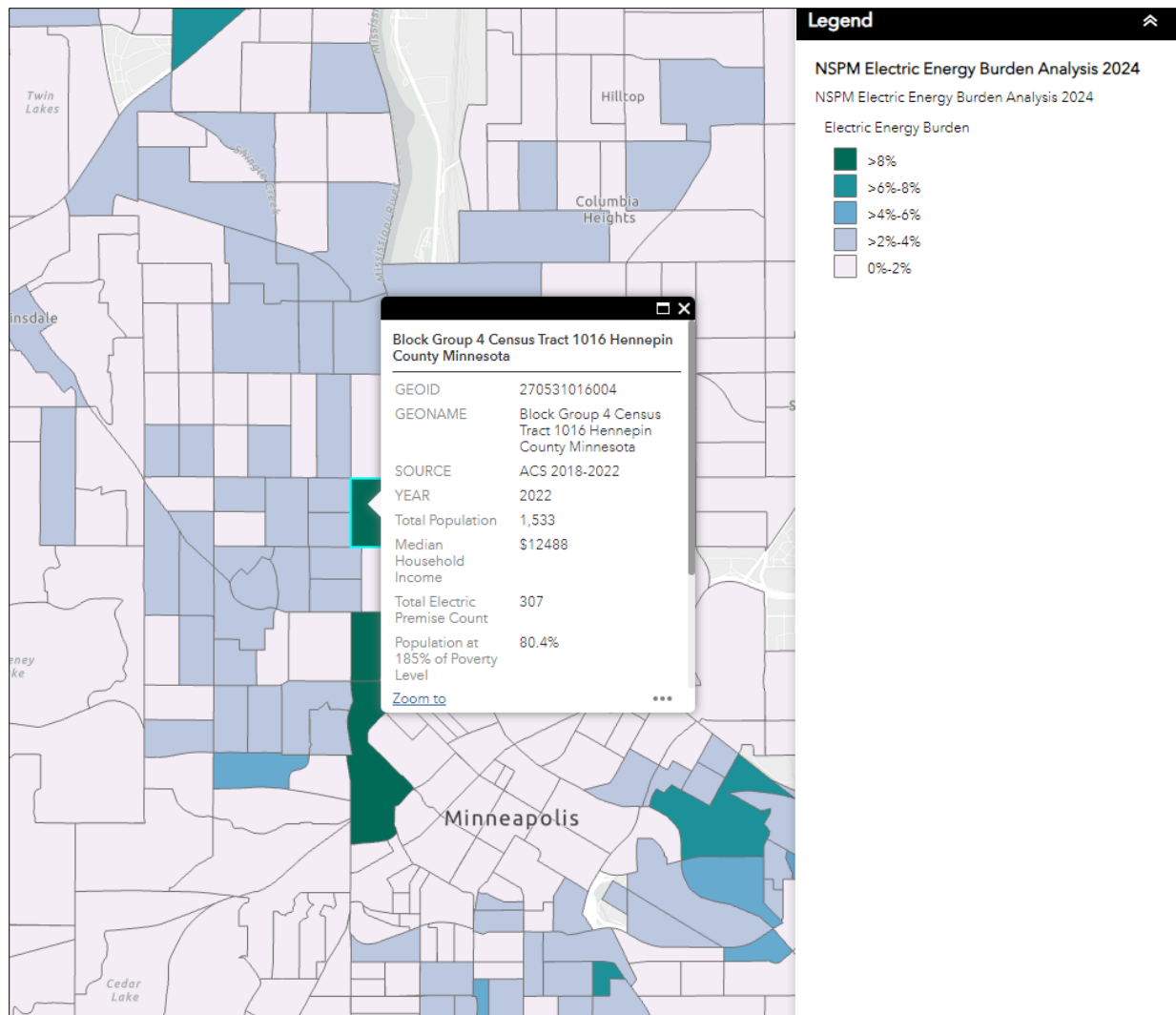


Figure 3. Snapshot of electric energy burden in Census Block Group 4 of Census Tract 1016, Hennepin County.

The household's electric energy burden with the Automatic Bill Credit would be:

$$\text{Electric energy burden} = \frac{\text{annual electricity cost, less bill credits}}{\text{annual income}}$$

$$\frac{(\$1,200 \text{ bill} - \$701 \text{ Automatic bill credit})}{\$12,488}$$

$$= \frac{\$499}{\$12,488} = 4\%$$

The fact that this hypothetical household has electric energy burden of exactly 4 percent is an artifact of our having assumed this household is the median household

in the CBG. Other households in the same CBG would receive the same bill credit, but their resulting household-level electric energy burden could be less than or greater than 4 percent, depending on their actual electricity bill and household income.

H. Estimated Annual Cost of the Pilot

To estimate the annual cost of the Automatic Bill Credit Pilot program, by CBG and overall, we returned to the analysis described above. We filtered the data to those CBGs where estimated annual average electric energy burden is greater than or equal to 4 percent. We calculated the bill credit needed in each eligible CBG to reduce annual electric energy burden to 4 percent for the median-income household. Multiplying this annual bill credit by the number of premises served in a CBG yields the annual cost to provide the Automatic Bill Credit to that CBG, and summing across all eligible CBGs yields the annual cost of bill credits for the pilot program.

Based on those calculations, the pilot as proposed here would provide a bill credit to about 23,000 households in 77 CBGs. The bill credit would vary by CBG, with the average across all CBGs being about \$458 annually per premise. Summing across all premises and CBGs, the estimated annual cost of bill credits is about \$5.4 million.

The Company proposes to absorb the administrative costs of delivering the pilot within our regular cost of doing business. Those include updating the geospatial analysis, doing calculations, developing the list of premise numbers to receive a bill credit, scheduling those bill credits in our billing system, administering the opt-out function, and customer outreach. If the pilot were to transition into a permanent program offering, we would track administrative costs separately, consistent with our other energy assistance programs.

One important cost of the pilot, in addition to the bill credits themselves, is monitoring and evaluation (M&E). For reasons discussed further in section II.J, we believe that it will be important to hire a third-party evaluator. On approval of the pilot, the Company would conduct a competitive solicitation to select a third-party evaluator, and would seek to recover the third-party M&E cost as part of the overall costs of the pilot.

I. Proposed Cost Recovery

The Company has considered various possible cost recovery mechanisms for the pilot. Many existing energy assistance programs – including PowerON, the Medical Affordability program, and the Low-Income Low Usage (LILU) discount – are funded via the Low-Income Energy Discount Rider. This appears as a surcharge on

the bills of all customers except those receiving the assistance.¹⁸ However, the total costs recovered via this Rider have increased in recent years. Multiple factors are involved, including auto-enrollment of LIHEAP recipients in PowerON leading to increased participation in that program, as well as the enactment of the LILU discount program starting in late 2023.¹⁹

Adding the estimated \$5.4 million annual cost of automated bill credits to the Low-Income Energy Discount Rider is perhaps not ideal, especially if one considers that the surcharge would (even if only slightly) increase the monthly bill of all customers – including some low-income customers not receiving any form of assistance. That could include customers who themselves have electric energy burden above 4 percent, but happen to live in a CBG that does not exceed this threshold, so does not qualify for the Automatic Bill Credit. Recovering the cost of the Automatic Bill Credit via the Low-Income Energy Discount Rider would result in those customers paying a slightly higher energy bill while not receiving the Automatic Bill Credit. Considering this, the Company sought a different mechanism to fund the Automatic Bill Credit Pilot.

We propose to recover the cost of the pilot using a portion of the U.S. Department of Energy (DOE) annual settlement payments related to the U.S. Government’s failure to create a long-term nuclear waste repository. As background, the Nuclear Waste Policy Act committed the DOE to take title to, transport, and dispose of spent fuel from the nation’s nuclear power plants beginning no later than January 31, 1998. The DOE has not accepted any spent nuclear fuel to date. In 1998, the Company filed the first of two lawsuits against DOE, seeking to recover damages associated with storage of spent nuclear fuel at our Prairie Island and Monticello nuclear generating plants. The Company reached a settlement agreement with the U.S. Government on these lawsuits in 2011, providing a mechanism for the Company to recover its spent nuclear fuel storage damages. That agreement has been extended several times since then, and each year the DOE has made a settlement payment under the agreement. The Company has generally sought approval of a credit mechanism to return the settlement amounts to customers. For example, in the case of the most recent payment – DOE #14, for \$16.8 million, received in November 2023 – we proposed returning the Minnesota-jurisdictional portion of the payment to our Minnesota electric customers as part of the 2022 Multiyear Rate Plan true-up refunds.²⁰

¹⁸ Labeled “Affordability Chrg” on electricity bills.

¹⁹ Northern States Power Company, doing business as Xcel Energy. REPLY COMMENTS. *Petition for Approval of a Modification to the Company’s Low Income Discount Program*. Docket Nos. E002/M-10-854 AND E002/M-04-1956. November 15, 2023.

²⁰ Northern States Power Company, doing business as Xcel Energy. NOTICE OF RECEIPT OF FOURTEENTH DOE SETTLEMENT PAYMENT AND REFUND PLAN. Docket Nos. E002/GR-92-1185,

We propose to recover the costs of this two-year pilot using a portion of the Minnesota-jurisdictional share of DOE settlement payments #15 and #16. Based on prior years, those payments are likely to be made in the fourth quarter of 2024 and fourth quarter of 2025. This timing will coincide well with beginning to deliver Automatic Bill Credits in early 2025, should the Commission approve our proposal.

With receipt of DOE payment #15, approximately \$5.4 million of the payment would be reserved to fund the first year of Automatic Bill Credits, plus a small amount for third-party M&E costs. The balance of DOE payment #15 would be returned to all Minnesota electric customers via a bill credit, consistent with past practice. The Company would follow the existing compliance requirements with the DOE payments, filing a letter detailing the total amount received from the DOE and the Minnesota jurisdiction's share with supporting calculations. This compliance filing would note the amount reserved for the Automatic Bill Credit Pilot, and estimated DOE credits based on the remaining portion. We propose a similar approach for year two of the pilot, using a portion of DOE #16. In addition, the total Automatic Bill Credits paid out annually would be tracked and at the end of each year of the pilot, would be trued up against the next DOE payment. If the two-year pilot is judged to be successful and is expanded into a permanent program, it could continue to be funded using future DOE settlement payments, or could transition to another funding mechanism.

For perspective, the Minnesota-jurisdictional share of DOE payment #14, received in November 2023, was \$12.3 million. If DOE payments #15 and 16 are in a similar ballpark, funding the Automatic Bill Credits would require about 45 percent of each payment – extending much-needed assistance to some of the Company's neediest customers – while leaving about 55 percent of the DOE payments to be returned to all customers via the usual mechanism.

J. Monitoring and Evaluation

A common best practice for new pilot programs is to develop an M&E plan to gather findings and demonstrate whether the pilot should be continued or expanded. The Company believes this pilot should adhere to this practice because it includes some elements that are new in the context of energy assistance programs. However, an integral feature of this pilot – not requiring any household-specific income qualification or program enrollment process – also presents a challenge for M&E.

G002/GR-92-1186, E002/GR-10-971, E002/M-20-743, E002/GR-21-630, G002/GR-21-678, G002/M-22-254, G002/M-23-468 and E002/M-21-815. December 22, 2023.

Household-by-household enrollment processes, even if viewed as a barrier to participation by some households, do provide an opportunity to interact with the customer and establish tracking mechanisms to evaluate the success of assistance programs. This pilot simply provides an automatic credit, so it requires a different M&E approach.

The Company consulted with internal subject matter experts on program M&E, including past use of third-party evaluators for energy efficiency pilots, rate pilots, and other programs. The Company has often worked with a third party, both for the enhanced credibility of the program evaluation process, and to take advantage of M&E consultants' expertise in survey design. We propose to do the same here. We would engage a third-party evaluator to prepare a pilot-specific M&E plan. We anticipate this plan would be survey-based, with a treatment group and control group design. This could allow customer responses to be correlated to billing data as deemed appropriate by the M&E consultant. The plan would likely begin with additional demographic data collection, including segmenting the sample population by homeowners, renters, and multifamily, and possibly other variables that influence energy burden such as type and age of housing stock. We anticipate providing the evaluator with electricity bill data pre- and post-delivery of the bill credit, to quantify the reduction in electric energy burden for households. We expect the evaluator may propose surveys (via telephone, email, or other appropriate methods) of a sample of participating households, collecting data on awareness, changes in ability to pay other household expenses due to receiving the bill credit, reduction in past-due balances, reduction in disconnections, and other key questions. To the extent feasible, we would collect data on household income of recipient households, to assess what portion of the overall benefits of the pilot are going to households who would also qualify for energy assistance programs with a specific household income threshold. It may be feasible to compare disconnections and arrearages between households receiving only the Automatic Bill Credit, vs. those receiving this in addition to other energy assistance.

We propose to select the independent evaluator via a competitive solicitation conducted on Commission approval of the pilot. We would then work with the chosen evaluator to design the M&E plan and metrics.

K. Potential Future Evolution After the Pilot

Our discussions in ESAG led to several ideas for potential future evolution of an Automatic Bill Credit program, after the initial two-year pilot. The Company and ESAG agreed that these would all add complexity, so should not be part of the initial pilot, but could be considered in the future depending on pilot learnings.

Testing different energy burden thresholds and bill credits. We here propose an eligibility threshold of CBG-level average electric energy burden greater than or equal to 4 percent, and a bill credit sized to reduce electric energy burden to that threshold for the median-income household in each CBG. Future refinements to the pilot could test other thresholds.

Targeting monthly energy burden. Monthly electric energy burden is more variable than annual electric energy burden, due to greater electricity use (and hence costs) in some months than in others. A future refinement could vary the size of the bill credit by month, aiming to get closer to reducing households' energy burden in that month to the target level. This could be helpful to households by providing a larger bill credit in months when their electricity bill is higher. We would not advise, however, re-evaluating eligible CBGs every month. Doing so would likely cause some CBGs to fluctuate in and out of eligibility from month to month, causing households in those CBGs to start and stop receiving a bill credit. Besides having higher administrative costs, we believe this would lead to customer confusion and dissatisfaction.

Coordination across electric and gas utilities, targeting overall energy burden. We here propose a pilot based on electric energy burden only, so that it can be designed on a common metric across Minneapolis, Saint Paul and other areas where Xcel Energy is the electric utility, but in some cases not the gas utility. In Minneapolis, most residents heat their homes with natural gas provided by CenterPoint Energy; elsewhere, another company provides natural gas or delivered heating fuels. With the gradual electrification of heating, this issue may diminish over time, but that process is likely to be a long one. A possible future phase of the pilot could be to coordinate reduction in energy burden across electric and heating fuel utilities – for example, basing the program on *overall* household energy burden rather than just electric, and jointly funding bill credits across electricity and natural gas utilities. The data coordination and regulatory approvals for such a joint program would be substantial – not insurmountable, but significant enough that we think attempting a joint program from the start would significantly delay the pilot program and the delivery of much-needed energy assistance. That said, we could further explore cross-utility collaboration while implementing the electric-only pilot.

Reintroducing more household-specific targeting of bill credits. The key benefit of this pilot is its simplicity from a customer perspective: it requires no enrollment process or income verification, which the Company has consistently heard can act as barriers to households taking advantage of assistance available to them. The acknowledged disadvantage of the simplified approach is that some households with lower energy burden, located in CBGs with energy burden above the threshold, will receive a bill

credit (“over-inclusion”), while some households with higher energy burden, located in CBGs with an energy burden below the threshold, will not receive a bill credit. The Company and ESAG ultimately agreed that for the initial pilot, the benefits of simplicity, mixed-wealth communities, community-wide investment, and lower administrative costs outweigh the disadvantages of potential over-inclusion. However, ESAG members suggested that over time, reintroduction of household-specific targeting of bill credits could be explored – as long as this can be done without unduly increasing the burden of enrollment or disincentivizing households from participating. ESAG members suggested the Company explore coordination with state or federal agencies to obtain household-level income data. This would be a complex process, and may be costly or infeasible. The consensus in ESAG was that it should be explored as a future possibility rather than delaying the pilot.²¹

Navigation assistance into other energy assistance and/or energy efficiency programs. Future reintroduction of household-specific income targeting raises the possibility that households who have received an Automatic Bill Credit for a time could stop receiving it. ESAG members suggested enhancing navigation assistance to make it easier for families who stop receiving the Automatic Bill Credit to opt into household-specific programs. One member suggested pairing the Automatic Bill Credit with navigation assistance on Inflation Reduction Act consumer incentives for energy efficiency – helping families make their homes more efficient and reduce their energy costs by the end of the two-year pilot.

Future evolution away from “layering.” We propose for the duration of this pilot to allow households located in CBGs eligible for the Automatic Bill Credit, who already receive another form of energy assistance, to receive the Automatic Bill Credit as well. For pilot purposes, this amounts to a decision to provide a deeper reduction in energy burden to recipient households. This decision could be changed in the future, spreading available energy assistance further by not allowing layering with other energy assistance. Alternately, if the Automatic Bill Credit program is working well, the Commission could consider transitioning existing programs that require household-specific income qualification into an expanded phase of the Automatic Bill Credit program.

²¹ The Company preliminarily explored with the Department of Commerce the idea of data coordination with state agencies. It appears that most state data sources for household income – e.g., unemployment data from the Minnesota Department of Employment and Economic Development, or tax data from the Minnesota Department of Revenue – have challenges and gaps that could result in households who need assistance being missed. These challenges may not be insurmountable, but they also do not have obvious near-term solutions. We believe this supports ESAG’s recommendation to move forward with a pilot and explore these as potential future improvements.

L. Consistency with Minnesota Statute on Nondiscriminatory Rates

Minn. Stat. § 216B.03 states, in part:

*Every rate made, demanded, or received by any public utility, or by any two or more public utilities jointly, shall be just and reasonable. Rates shall not be unreasonably preferential, unreasonably prejudicial, or discriminatory, but shall be sufficient, equitable, and consistent in application to a class of consumers... Any doubt as to reasonableness should be resolved in favor of the consumer.*²²

The Company believes the Automatic Bill Credit Pilot is consistent with this statute, as well as with other generally accepted rate design principles. Since the pilot would offer a bill credit to some residential customers and not to others, it is important to be explicit about why we believe this preference is reasonable and consistent with statute.

We begin with a literal reading of the statute. It speaks only to *rates* – cents per kilowatt hour (kWh) – and requires that electricity rates be just and reasonable; not unreasonably preferential, unreasonably prejudicial, or discriminatory; and sufficient, equitable, and consistent in application to a class of consumers. The proposed pilot would provide a credit on electric *bills*; it does not propose discounting rates for a subclass of residential customers. Customers receiving a bill credit under this pilot would continue to pay the same rate per kWh as all other residential customers, meeting the “sufficient, equitable, and consistent in application to a class of consumers” language of the statute. The pilot would also respect fundamental principles of rate design in which rates are based on class cost of service studies: the rates paid by customers receiving the Automatic Bill Credit would remain the rates that reflect the cost of serving the Company’s residential customer class overall.

However, it is possible that the Legislature in enacting Minn. Stat. § 216B.03 meant “rates” to refer to electricity costs more generally – that is, bills as well as rates. The proposed pilot offers a bill credit to some residential customers (those in eligible CBGs) and not to others. This could be considered “preferential,” so it becomes incumbent on the Company to demonstrate it is not unreasonably preferential.

We believe the proposed Automatic Bill Credit is not “unreasonably preferential, unreasonably prejudicial, or discriminatory,” because it has the effect of addressing past discrimination – not by the Company, but due to systemic and long-term societal inequities that have led to geographic concentration of poverty, older and less efficient housing that increases energy costs, lower incomes, fewer job opportunities,

²² See [Sec. 216B.03 MN Statutes](#).

and other disparities in certain identified CBGs. The various state²³ and federal²⁴ mapping tools discussed above clearly show concentrated areas of poverty, older housing, and other inequities that correspond to areas with a higher proportion of residents being People of Color. Research has shown that these correlations are not random, but the result of documented past and ongoing practices affecting where people live, how much income they earn, and other disparities.²⁵ While the Company did not cause those disparities, we believe we can play a role in reducing them by offering a pilot program that targets CBGs with high energy burden. While the program may be considered preferential, if it is we believe it to be reasonably so, and in an anti-discriminatory direction.

In addition, this pilot is not the first instance of regulators approving a rate discount or bill credits that go to some residential customers but not others. This is true of existing programs like PowerON, Gas Affordability, Medical Affordability, and the recently approved Low-Income Low-Usage discount. The Automatic Bill Credit Pilot differs from those programs in being based on Census data and not requiring income qualification, but the principle of providing a reasonable preference to a subset of residential customers is similar.

Finally, the Company believes the proposed pilot meets the statutory requirement that “any doubt as to reasonableness should be resolved in favor of the consumer.” The pilot, even if funded via DOE settlement payments as proposed here, does of course have a cost. We believe this is a reasonable cost in order to explore an innovative new approach to providing assistance to customers in need. We believe this meets the intent of the statute to resolve any doubt as to reasonableness in favor of the consumer – specifically, the Company’s neediest customers.

CONCLUSION

The Company and ESAG have worked together over the past 18 months to enhance equity in energy programs, broaden participation in energy decision-making, and in

²³ See [Understanding environmental justice in Minnesota \(arcgis.com\)](https://arcgis.com).

²⁴ See for example [EJScreen \(epa.gov\)](https://epa.gov), [Energy Justice Dashboard \(anl.gov\)](https://anl.gov), [LEAD Tool | Department of Energy](https://leadtool.org), and [Explore the map - Climate & Economic Justice Screening Tool \(geoplatform.gov\)](https://geoplatform.gov).

²⁵ See for example [Regional Indicators 2021 - Minneapolis Saint Paul Economic Development | Greater MSP](https://ummn.edu), [Center for Economic Inclusion - Indicators for an inclusive regional economy](https://ummn.edu) and [The Minnesota Paradox | Hubert H. Humphrey School of Public Affairs \(umn.edu\)](https://ummn.edu) and [Systemic racism haunts homeownership rates in Minnesota | Federal Reserve Bank of Minneapolis \(minneapolisfed.org\)](https://minneapolisfed.org) and [How the racial wealth gap has evolved—and why it persists | Federal Reserve Bank of Minneapolis \(minneapolisfed.org\)](https://minneapolisfed.org).

particular to design new strategies to reduce energy burden for low-income and BIPOC customers. The concept of an Automatic Bill Credit Pilot program for households in high energy burden Census Block Groups has consistently garnered broad support. This is the first proposed new program to emerge from the ESAG process, through which the Company has sought broader participation by low-income advocates and BIPOC community-based organizations in our decision-making.

Xcel Energy and the ESAG member organizations signed onto this petition support Commission approval of this pilot program, which we believe could:

- Complement and amplify the benefits of existing federal, state and utility energy assistance programs;
- Deliver much-needed support to economically struggling households in some of the poorest areas of the Company's service territory;
- Work in concert with energy efficiency programs (reducing energy costs in the longer term) and workforce development programs (increasing incomes) as a holistic approach to reducing energy burden;
- Demonstrate innovation in the use of mapping tools to identify customers in need and geographically target energy affordability programs; and
- Demonstrate innovation in minimizing the income qualification and program enrollment burdens that have consistently been a barrier to participation in energy assistance.

Dated:

April 16, 2024

Northern States Power Company

STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION

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

IN THE MATTER OF EFFORTS TO
ADVANCE WORKFORCE DIVERSITY,
INCLUSIVE PARTICIPATION, AND
EQUITABLE ACCESS TO UTILITY SERVICES
FOR XCEL ENERGY

DOCKET NOS. E002/M-22-266 AND
E002/RP-19-368

PETITION

SUMMARY OF FILING

Please take notice that on April 16, 2024, Northern States Power Company doing business as Xcel Energy filed with the Minnesota Public Utilities Commission a Petition requesting approval of a new pilot program to provide an Automatic Bill Credit on electricity bills within identified areas of high electric energy burden.

CERTIFICATE OF SERVICE

I, Christine Schwartz, 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 NOS. E002/M-22-266
E002/RP-19-368

Dated this 16th day of April 2024

/s/

Christine Schwartz
Regulatory Administrator

[illegible]

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
John	Bailey	bailey@ilsr.org	Institute For Local Self-Reliance	1313 5th St SE Ste 303 Minneapolis, MN 55414	Electronic Service	No	OFF_SL_22-266_M-22-266
Mark	Bakk	mbakk@lcp.coop	Lake Country Power	26039 Bear Ridge Drive Cohasset, MN 55721	Electronic Service	No	OFF_SL_22-266_M-22-266
Jessica L	Bayles	Jessica.Bayles@stoel.com	Stoel Rives LLP	1150 18th St NW Ste 325 Washington, DC 20036	Electronic Service	No	OFF_SL_22-266_M-22-266
Mathias	Bell	mathias@weavegrid.com	WeaveGrid	375 Alabama Street, Suite 325 San Francisco, CA 94110	Electronic Service	No	OFF_SL_22-266_M-22-266
David	Bender	dbender@earthjustice.org	Earthjustice	1001 G Street NW Suite 1000 Washington, DC 20001	Electronic Service	No	OFF_SL_22-266_M-22-266
Tracy	Bertram	tbertram@ci.becker.mn.us		12060 Sherburne Ave Becker City Hall Becker, MN 55308-4694	Electronic Service	No	OFF_SL_22-266_M-22-266
James J.	Bertrand	james.bertrand@stinson.com	STINSON LLP	50 S 6th St Ste 2600 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_22-266_M-22-266
Derek	Bertsch	derek.bertsch@mrenergy.com	Missouri River Energy Services	3724 West Avera Drive PO Box 88920 Sioux Falls, SD 57109-8920	Electronic Service	No	OFF_SL_22-266_M-22-266
Laura	Bishop	Laura.Bishop@state.mn.us	MN Pollution Control Agency	520 Lafayette Rd Saint Paul, MN 55155	Electronic Service	No	OFF_SL_22-266_M-22-266

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
William	Black	bblack@mmua.org	MMUA	Suite 200 3131 Fernbrook Lane Plymouth, MN 55447	Electronic Service North	No	OFF_SL_22-266_M-22-266
Zoe	Bourgerie	zoe.bourgerie@minneapolismn.gov	Minneapolis City of Lakes	350 S 5th St Rm 307 Minneapolis, MN 55415	Electronic Service	No	OFF_SL_22-266_M-22-266
Kenneth	Bradley	kbradley1965@gmail.com		2837 Emerson Ave S Apt CW112 Minneapolis, MN 55408	Electronic Service	No	OFF_SL_22-266_M-22-266
Elizabeth	Brama	ebrama@taftlaw.com	Taft Stettinius & Hollister LLP	2200 IDS Center 80 South 8th Street Minneapolis, MN 55402	Electronic Service	No	OFF_SL_22-266_M-22-266
Jon	Brekke	jbrekke@grenergy.com	Great River Energy	12300 Elm Creek Boulevard Maple Grove, MN 553694718	Electronic Service	No	OFF_SL_22-266_M-22-266
Sydney R.	Briggs	sbriggs@swce.coop	Steele-Waseca Cooperative Electric	2411 W. Bridge St PO Box 485 Owatonna, MN 55060-0485	Electronic Service	No	OFF_SL_22-266_M-22-266
Mark B.	Bring	mbring@otpc.com	Otter Tail Power Company	215 South Cascade Street PO Box 496 Fergus Falls, MN 565380496	Electronic Service	No	OFF_SL_22-266_M-22-266
Janet	Brown	jab5100@gmail.com	Sabathani Community Center (Sabathani/SCC)	310 E 38th St Ste 200 Minneapolis, MN 55409	Electronic Service	No	OFF_SL_22-266_M-22-266
Christina	Brusven	cbrusven@fredlaw.com	Fredrikson Byron	60 S 6th St Ste 1500 Minneapolis, MN 55402-4400	Electronic Service	No	OFF_SL_22-266_M-22-266

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
LORI	CLOBES	lclobes@mienergy.coop	MiEnergy Cooperative	31110 COOPERATIVE WAY PO BOX 626 RUSHFORD, MN 55971	Electronic Service	No	OFF_SL_22-266_M-22-266
James	Canaday	james.canaday@ag.state.mn.us	Office of the Attorney General-RUD	Suite 1400 445 Minnesota St. St. Paul, MN 55101	Electronic Service	No	OFF_SL_22-266_M-22-266
Thomas	Carlson	thomas.carlson@edf-re.com	EDF Renewable Energy	10 2nd St NE Ste. 400 Minneapolis, MN 55413	Electronic Service	No	OFF_SL_22-266_M-22-266
Douglas M.	Carnival	dcarnival@carnivalberns.com	McGrann Shea Carnival Straughn & Lamb	N/A	Electronic Service	No	OFF_SL_22-266_M-22-266
Gabriel	Chan	gabechan@umn.edu	University of Minnesota	130 Hubert H. Humphrey Center 301 19th Ave S Minneapolis, MN 55455	Electronic Service	No	OFF_SL_22-266_M-22-266
Cody	Chilson	cchilson@greatermngas.com	Greater Minnesota Gas, Inc. & Greater MN Transmission, LLC	1900 Cardinal Ln PO Box 798 Faribault, MN 55021	Electronic Service	No	OFF_SL_22-266_M-22-266
Ray	Choquette	rchoquette@agp.com	Ag Processing Inc.	12700 West Dodge Road PO Box 2047 Omaha, NE 68103-2047	Electronic Service	No	OFF_SL_22-266_M-22-266
John	Coffman	john@johncoffman.net	AARP	871 Tuxedo Blvd. St. Louis, MO 63119-2044	Electronic Service	No	OFF_SL_22-266_M-22-266
Kenneth A.	Colburn	kcolburn@symbioticstrategies.com	Symbiotic Strategies, LLC	26 Winton Road Meredith, NH 32535413	Electronic Service	No	OFF_SL_22-266_M-22-266
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_22-266_M-22-266

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Jean	Comstock	jean.comstock.dbcc@gmail.com	St. Paul 350	729 6th St E St. Paul, MN 55106	Electronic Service	No	OFF_SL_22-266_M-22-266
Hillary	Creurer	hcreurer@mnpower.com	Minnesota Power	30 W Superior St Duluth, MN 55802	Electronic Service	No	OFF_SL_22-266_M-22-266
George	Crocker	gwillc@nawo.org	North American Water Office	5093 Keats Avenue Lake Elmo, MN 55042	Electronic Service	No	OFF_SL_22-266_M-22-266
Carrie	Desmond	carrie.desmond@metrotransit.org	Metropolitan Council	560 6th Avenue North Minneapolis, MN 55411	Electronic Service	No	OFF_SL_22-266_M-22-266
Curt	Dieren	curt.dieren@dgr.com	L&O Power Cooperative	1302 S Union St Rock Rapids, IA 51246	Electronic Service	No	OFF_SL_22-266_M-22-266
Bridget	Dockter	Bridget.Dockter@xcelenergy.com		N/A	Electronic Service	No	OFF_SL_22-266_M-22-266
Carlton	Doyle Fontaine	carlton.doyle.fontaine@senate.mn	MN Senate	75 Rev Dr Martin Luther King Jr Blvd Room G-17 St Paul, MN 55155	Electronic Service	No	OFF_SL_22-266_M-22-266
J.	Drake Hamilton	hamilton@fresh-energy.org	Fresh Energy	408 St Peter St Ste 350 Saint Paul, MN 55101	Electronic Service	No	OFF_SL_22-266_M-22-266
Michelle	Dreier	mdreier@electricalassociation.com		N/A	Electronic Service	No	OFF_SL_22-266_M-22-266
Adam	Duinick	aduinick@ncsccc.org	North Central States Regional Council of Carpenters	700 Olive Street St. Paul, MN 55130	Electronic Service	No	OFF_SL_22-266_M-22-266
Brian	Edstrom	briane@cubminnesota.org	Citizens Utility Board of Minnesota	332 Minnesota St Ste W1360 Saint Paul, MN 55101	Electronic Service	No	OFF_SL_22-266_M-22-266

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Kristen	Eide Tollefson	healingsystems69@gmail.com	R-CURE	28477 N Lake Ave Frontenac, MN 55026-1044	Electronic Service	No	OFF_SL_22-266_M-22-266
Bob	Eleff	bob.eleff@house.mn	Regulated Industries Cmte	100 Rev Dr Martin Luther King Jr Blvd Room 600 St. Paul, MN 55155	Electronic Service	No	OFF_SL_22-266_M-22-266
Ron	Elwood	relwood@mnlsap.org	Legal Services Advocacy Project	970 Raymond Avenue Suite G-40 Saint Paul, MN 55114	Electronic Service	No	OFF_SL_22-266_M-22-266
Betsy	Engelking	betsy@nationalgridrenewables.com	National Grid Renewables	8400 Normandale Lake Blvd Ste 1200 Bloomington, MN 55437	Electronic Service	No	OFF_SL_22-266_M-22-266
Oncu	Er	oncu.er@avantenergy.com	Avant Energy, Agent for MMPA	220 S. Sixth St. Ste. 1300 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_22-266_M-22-266
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_22-266_M-22-266
Eric	Fehlhaber	efehlhaber@dakotaelectric.com	Dakota Electric Association	4300 220th St W Farmington, MN 55024	Electronic Service	No	OFF_SL_22-266_M-22-266
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 551012198	Electronic Service	No	OFF_SL_22-266_M-22-266
Mike	Fiterman	mikefiterman@libertydiversified.com	Liberty Diversified International	5600 N Highway 169 Minneapolis, MN 55428-3096	Electronic Service	No	OFF_SL_22-266_M-22-266

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Lucas	Franco	lfranco@liunagroc.com	LIUNA	81 Little Canada Rd E Little Canada, MN 55117	Electronic Service	No	OFF_SL_22-266_M-22-266
Nathan	Franzen	nathan@nationalgridrenewables.com	Geronimo Energy, LLC	8400 Normandale Lake Blvd Ste 1200 Bloomington, MN 55437	Electronic Service	No	OFF_SL_22-266_M-22-266
Amy	Fredregill	afredregill@environmental-initiative.org	Environmental Initiative, MN Sustainable Growth Coalition	211 First St N Ste 250 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_22-266_M-22-266
Daryll	Fuentes	energy@usg.com	USG Corporation	550 W Adams St Chicago, IL 60661	Electronic Service	No	OFF_SL_22-266_M-22-266
Hal	Galvin	halgalvin@comcast.net	Provectus Energy Development llc	1936 Kenwood Parkway Minneapolis, MN 55405	Electronic Service	No	OFF_SL_22-266_M-22-266
James	Garness	james.r.garness@xcelenergy.com		N/A	Electronic Service	No	OFF_SL_22-266_M-22-266
Edward	Garvey	edward.garvey@AESLconsulting.com	AESL Consulting	32 Lawton St Saint Paul, MN 55102-2617	Electronic Service	No	OFF_SL_22-266_M-22-266
Edward	Garvey	garveyed@aol.com	Residence	32 Lawton St Saint Paul, MN 55102	Electronic Service	No	OFF_SL_22-266_M-22-266
Bruce	Gerhardson	bgerhardson@otpc.com	Otter Tail Power Company	PO Box 496 215 S Cascade St Fergus Falls, MN 565380496	Electronic Service	No	OFF_SL_22-266_M-22-266
Allen	Gleckner	gleckner@fresh-energy.org	Fresh Energy	408 St. Peter Street Ste 350 Saint Paul, MN 55102	Electronic Service	No	OFF_SL_22-266_M-22-266

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Jenny	Glumack	jenny@mrea.org	Minnesota Rural Electric Association	11640 73rd Ave N Maple Grove, MN 55369	Electronic Service	No	OFF_SL_22-266_M-22-266
Anita	Grace	anita@gracemulticultural.com	GRACE Multicultural	12959 196th LN NW Elk River, MN 55330	Electronic Service	No	OFF_SL_22-266_M-22-266
Todd J.	Guerrero	todd.guerrero@kutakrock.com	Kutak Rock LLP	Suite 1750 220 South Sixth Street Minneapolis, MN 554021425	Electronic Service	No	OFF_SL_22-266_M-22-266
Shubha	Harris	Shubha.M.Harris@xcelenergy.com	Xcel Energy	414 Nicollet Mall, 401 - FL 8 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_22-266_M-22-266
Kim	Havey	kim.havey@minneapolismn.gov	City of Minneapolis	350 South 5th Street, Suite 315M Minneapolis, MN 55415	Electronic Service	No	OFF_SL_22-266_M-22-266
Philip	Hayet	phayet@jkenn.com	J. Kennedy and Associates, Inc.	570 Colonial Park Drive Suite 305 Roswell, GA 30075-3770	Electronic Service	No	OFF_SL_22-266_M-22-266
Todd	Headlee	theadlee@dvigridsolutions.com	Dominion Voltage, Inc.	701 E. Cary Street Richmond, VA 23219	Electronic Service	No	OFF_SL_22-266_M-22-266
Adam	Heinen	aheinen@dakotaelectric.com	Dakota Electric Association	4300 220th St W Farmington, MN 55024	Electronic Service	No	OFF_SL_22-266_M-22-266
Jared	Hendricks	jared.hendricks@owatonnautilities.com	Owatonna Municipal Public Utilities	PO Box 800 208 S Walnut Ave Owatonna, MN 55060-2940	Electronic Service	No	OFF_SL_22-266_M-22-266
Annete	Henkel	mui@mutilityinvestors.org	Minnesota Utility Investors	413 Wacouta Street #230 St. Paul, MN 55101	Electronic Service	No	OFF_SL_22-266_M-22-266

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Kristin	Henry	kristin.henry@sierraclub.org	Sierra Club	2101 Webster St Ste 1300 Oakland, CA 94612	Electronic Service	No	OFF_SL_22-266_M-22-266
Sandra	Henry	Sandra.Henry@elevatenp.org	Elevate	322 S Green St Ste 300 Chicago, IL 60607	Electronic Service	No	OFF_SL_22-266_M-22-266
Corey	Hintz	chintz@dakotaelectric.com	Dakota Electric Association	4300 220th Street Farmington, MN 550249583	Electronic Service	No	OFF_SL_22-266_M-22-266
Joe	Hoffman	ja.hoffman@smmpa.org	SMMPA	500 First Ave SW Rochester, MN 55902-3303	Electronic Service	No	OFF_SL_22-266_M-22-266
Michael	Hoppe	lu23@ibew23.org	Local Union 23, I.B.E.W.	445 Etna Street Ste. 61 St. Paul, MN 55106	Electronic Service	No	OFF_SL_22-266_M-22-266
MJ	Horner	mj.horner@xcelenergy.com		N/A	Electronic Service	No	OFF_SL_22-266_M-22-266
Lori	Hoyum	lhoyum@mnpower.com	Minnesota Power	30 West Superior Street Duluth, MN 55802	Electronic Service	No	OFF_SL_22-266_M-22-266
Jan	Hubbard	jan.hubbard@comcast.net		7730 Mississippi Lane Brooklyn Park, MN 55444	Electronic Service	No	OFF_SL_22-266_M-22-266
Geoffrey	Inge	ginge@regintl.com	Regulatory Intelligence LLC	PO Box 270636 Superior, CO 80027-9998	Electronic Service	No	OFF_SL_22-266_M-22-266
Ralph	Jacobson	ralphj@ips-solar.com		2126 Roblyn Avenue Saint Paul, MN 55104	Electronic Service	No	OFF_SL_22-266_M-22-266

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Casey	Jacobson	cjacobson@bepc.com	Basin Electric Power Cooperative	1717 East Interstate Avenue Bismarck, ND 58501	Electronic Service	No	OFF_SL_22-266_M-22-266
Travis	Jacobson	travis.jacobson@mdu.com	Great Plains Natural Gas Company	400 N 4th St Bismarck, ND 58501	Electronic Service	No	OFF_SL_22-266_M-22-266
John S.	Jaffray	jjaffray@jrpowers.com	JJR Power	350 Highway 7 Suite 236 Excelsior, MN 55331	Electronic Service	No	OFF_SL_22-266_M-22-266
Alan	Jenkins	aj@jenkinsatlaw.com	Jenkins at Law	2950 Yellowtail Ave. Marathon, FL 33050	Electronic Service	No	OFF_SL_22-266_M-22-266
Andrea	Jenkins	Andrea.Jenkins@minneapolismn.gov	Minneapolis City of Lakes	350 S 5th St Room 307 Minneapolis, MN 55415	Electronic Service	No	OFF_SL_22-266_M-22-266
Richard	Johnson	Rick.Johnson@lawmoss.com	Moss & Barnett	150 S. 5th Street Suite 1200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_22-266_M-22-266
Sarah	Johnson Phillips	sarah.phillips@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_22-266_M-22-266
Nate	Jones	njones@hcpd.com	Heartland Consumers Power	PO Box 248 Madison, SD 57042	Electronic Service	No	OFF_SL_22-266_M-22-266
Michael	Kampmeyer	mkampmeyer@a-e-group.com	AEG Group, LLC	260 Salem Church Road Sunfish Lake, MN 55118	Electronic Service	No	OFF_SL_22-266_M-22-266

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Nick	Kaneski	nick.kaneski@enbridge.com	Enbridge Energy Company, Inc.	11 East Superior St Ste 125 Duluth, MN 55802	Electronic Service	No	OFF_SL_22-266_M-22-266
Stacey	Karels	skarels@local563.org	Mankato Area Bldg & Construction Trades Council	310 McKinzie St Mankato, MN 56001	Electronic Service	No	OFF_SL_22-266_M-22-266
William D	Kenworthy	will@votesolar.org	Vote Solar	332 S Michigan Ave FL 9 Chicago, IL 60604	Electronic Service	No	OFF_SL_22-266_M-22-266
Samuel B.	Ketchum	sketchum@kennedy-graven.com	Kennedy & Graven, Chartered	150 S 5th St Ste 700 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_22-266_M-22-266
Brad	Klein	bklein@elpc.org	Environmental Law & Policy Center	35 E. Wacker Drive, Suite 1600 Suite 1600 Chicago, IL 60601	Electronic Service	No	OFF_SL_22-266_M-22-266
Frank	Kohlasch	frank.kohlasch@state.mn.us	MN Pollution Control Agency	520 Lafayette Rd N. St. Paul, MN 55155	Electronic Service	No	OFF_SL_22-266_M-22-266
Brian	Kolbinger	brian@beckertownship.org	Becker Township Board	PO Box 248 12165 Hancock St Becker, MN 55308	Electronic Service	No	OFF_SL_22-266_M-22-266
Brian	Krambeer	bkrambeer@mienergy.coop	MiEnergy Cooperative	PO Box 626 31110 Cooperative Way Rushford, MN 55971	Electronic Service	No	OFF_SL_22-266_M-22-266
Michael	Krause	michaelkrause61@yahoo.com	Kandiyo Consulting, LLC	433 S 7th Street Suite 2025 Minneapolis, MN 55415	Electronic Service	No	OFF_SL_22-266_M-22-266

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Michael	Krikava	mkrikava@taftlaw.com	Taft Stettinius & Hollister LLP	2200 IDS Center 80 S 8th St Minneapolis, MN 55402	Electronic Service	No	OFF_SL_22-266_M-22-266
Kay	Kuhlmann	Teri.Swanson@ci.red-wing.mn.us	City Of Red Wing	315 West Fourth Street Red Wing, MN 55066	Electronic Service	No	OFF_SL_22-266_M-22-266
Nicolle	Kupser	nkupser@greatermngas.com	Greater Minnesota Gas, Inc. & Greater MN Transmission, LLC	1900 Cardinal Ln PO Box 798 Faribault, MN 55021	Electronic Service	No	OFF_SL_22-266_M-22-266
Brenda	Kyle	bkyle@stpaulchamber.com	St. Paul Area Chamber of Commerce	401 N Robert Street Suite 150 St Paul, MN 55101	Electronic Service	No	OFF_SL_22-266_M-22-266
Mary	LaGarde	mlagarde@maicnet.org	Minneapolis American Indian Center	1530 E Franklin Ave Minneapolis, MN 55404	Electronic Service	No	OFF_SL_22-266_M-22-266
Matthew	Lacey	mlacey@greenergy.com	Great River Energy	12300 Elm Creek Boulevard Maple Grove, MN 553694718	Electronic Service	No	OFF_SL_22-266_M-22-266
Carmel	Laney	carmel.laney@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_22-266_M-22-266
Peder	Larson	plarson@larkinhoffman.com	Larkin Hoffman Daly & Lindgren, Ltd.	8300 Norman Center Drive Suite 1000 Bloomington, MN 55437	Electronic Service	No	OFF_SL_22-266_M-22-266
James D.	Larson	james.larson@avantenergy.com	Avant Energy Services	220 S 6th St Ste 1300 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_22-266_M-22-266
Dean	Leischow	dean@sunrisenrg.com	Sunrise Energy Ventures	315 Manitoba Ave Ste 200 Wayzata, MN 55391	Electronic Service	No	OFF_SL_22-266_M-22-266

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Rachel	Leonard	rachel.leonard@ci.monticello.mn.us	City of Monticello	505 Walnut St Ste 1 Monticello, MN 55362	Electronic Service	No	OFF_SL_22-266_M-22-266
Annie	Levenson Falk	annief@ci.mn.us	Citizens Utility Board of Minnesota	332 Minnesota Street, Suite W1360 St. Paul, MN 55101	Electronic Service	No	OFF_SL_22-266_M-22-266
Jason	Loos	jason.loos@centerpointenergy.com	CenterPoint Energy Resources Corp.	505 Nicollet Mall 3rd Floor Minneapolis, MN 55402	Electronic Service	No	OFF_SL_22-266_M-22-266
Susan	Ludwig	sludwig@mnpower.com	Minnesota Power	30 West Superior Street Duluth, MN 55802	Electronic Service	No	OFF_SL_22-266_M-22-266
Alice	Madden	alice@communitypowermn.org	Community Power	2720 E 22nd St Minneapolis, MN 55406	Electronic Service	No	OFF_SL_22-266_M-22-266
Kavita	Maini	kmairi@wi.rr.com	KM Energy Consulting, LLC	961 N Lost Woods Rd Oconomowoc, WI 53066	Electronic Service	No	OFF_SL_22-266_M-22-266
Emily	Marshall	emarshall@mojlaw.com	Miller O'Brien Jensen, PA	120 S. 6th Street Suite 2400 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_22-266_M-22-266
Gregg	Mast	gmast@cleanenergyeconomy.mn.org	Clean Energy Economy Minnesota	4808 10th Avenue S Minneapolis, MN 55417	Electronic Service	No	OFF_SL_22-266_M-22-266
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	OFF_SL_22-266_M-22-266

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Taylor	McNair	taylor@gridlab.org		668 Capp Street San Francisco, CA 94110	Electronic Service	No	OFF_SL_22-266_M-22-266
Thomas	Melone	Thomas.Melone@AllcoUS.com	Minnesota Go Solar LLC	222 South 9th Street Suite 1600 Minneapolis, MN 55120	Electronic Service	No	OFF_SL_22-266_M-22-266
Melanie	Mesko Lee	Melanie.Lee@burnsvillemn.gov	City of Burnsville	100 Civic Center Parkway Burnsville, MN 55337-3867	Electronic Service	No	OFF_SL_22-266_M-22-266
Peder	Mewis	pmewis@cleangridalliance.org	Clean Grid Alliance	570 Asbury St. St. Paul, MN 55104	Electronic Service	No	OFF_SL_22-266_M-22-266
Stacy	Miller	stacy.miller@minneapolismn.gov	City of Minneapolis	350 S. 5th Street Room M 301 Minneapolis, MN 55415	Electronic Service	No	OFF_SL_22-266_M-22-266
David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022093	Electronic Service	No	OFF_SL_22-266_M-22-266
Dalene	Monsebroten	dalene.monsebroten@nmpagency.com	Northern Municipal Power Agency	123 2nd St W Thief River Falls, MN 56701	Electronic Service	No	OFF_SL_22-266_M-22-266
Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP	33 South Sixth St Ste 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_22-266_M-22-266
Evan	Mulholland	emulholland@mncenter.org	Minnesota Center for Environmental Advocacy	1919 University Ave W Ste 515 Saint Paul, MN 55101	Electronic Service	No	OFF_SL_22-266_M-22-266
Alan	Muller	alan@greendel.org	Energy & Environmental Consulting	1110 West Avenue Red Wing, MN 55066	Electronic Service	No	OFF_SL_22-266_M-22-266

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Carl	Nelson	cnelson@mncee.org	Center for Energy and Environment	212 3rd Ave N Ste 560 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_22-266_M-22-266
Ben	Nelson	benn@cmpasgroup.org	CMMPA	459 South Grove Street Blue Earth, MN 56013	Electronic Service	No	OFF_SL_22-266_M-22-266
David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency	220 South Sixth Street Suite 1300 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_22-266_M-22-266
Sephra	Ninow	sephra.ninow@energycenter.org	Center for Sustainable Energy	426 17th Street, Suite 700 Oakland, CA 94612	Electronic Service	No	OFF_SL_22-266_M-22-266
Rolf	Nordstrom	rnordstrom@gpisd.net	Great Plains Institute	2801 21ST AVE S STE 220 Minneapolis, MN 55407-1229	Electronic Service	No	OFF_SL_22-266_M-22-266
Samantha	Norris	samanthanorris@alliantenergy.com	Interstate Power and Light Company	200 1st Street SE PO Box 351 Cedar Rapids, IA 524060351	Electronic Service	No	OFF_SL_22-266_M-22-266
M. William	O'Brien	bobrien@mojlaw.com	Miller O'Brien Jensen, P.A.	120 S 6th St Ste 2400 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_22-266_M-22-266
David	O'Brien	david.obrien@navigant.com	Navigant Consulting	77 South Bedford St Ste 400 Burlington, MA 01803	Electronic Service	No	OFF_SL_22-266_M-22-266
Ric	O'Connell	ric@gridlab.org	GridLab	2120 University Ave Berkeley, CA 94704	Electronic Service	No	OFF_SL_22-266_M-22-266

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Jeff	O'Neill	jeff.oneill@ci.monticello.mn.us	City of Monticello	505 Walnut Street Suite 1 Monticello, MN 55362	Electronic Service	No	OFF_SL_22-266_M-22-266
Nate	O'Reilly	nate@iron512.com	Ironworkers Local #512	851 Pierce Butler Route St Paul, MN 55104	Electronic Service	No	OFF_SL_22-266_M-22-266
Matthew	Olsen	molsen@otpc.com	Otter Tail Power Company	215 South Cascade Street Fergus Falls, MN 56537	Electronic Service	No	OFF_SL_22-266_M-22-266
Russell	Olson	rolson@hcpd.com	Heartland Consumers Power District	PO Box 248 Madison, SD 570420248	Electronic Service	No	OFF_SL_22-266_M-22-266
Carol A.	Overland	overland@legalelectric.org	Legalelectric - Overland Law Office	1110 West Avenue Red Wing, MN 55066	Electronic Service	No	OFF_SL_22-266_M-22-266
John	Pacheco	johnpachecojr@gmail.com		N/A	Electronic Service	No	OFF_SL_22-266_M-22-266
Greg	Palmer	gpalmer@greatermngas.com	Greater Minnesota Gas, Inc. & Greater MN Transmission, LLC	1900 Cardinal Ln PO Box 798 Faribault, MN 55021	Electronic Service	No	OFF_SL_22-266_M-22-266
Jessica	Palmer Denig	jessica.palmer-Denig@state.mn.us	Office of Administrative Hearings	600 Robert St N PO Box 64620 St. Paul, MN 55164	Electronic Service	No	OFF_SL_22-266_M-22-266
Dan	Patry	dpatry@sunedison.com	SunEdison	600 Clipper Drive Belmont, CA 94002	Electronic Service	No	OFF_SL_22-266_M-22-266
Jeffrey C	Paulson	jeff.jcplaw@comcast.net	Paulson Law Office, Ltd.	4445 W 77th Street Suite 224 Edina, MN 55435	Electronic Service	No	OFF_SL_22-266_M-22-266

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Jose	Perez	jose@hispanicsinenergy.com	Hispanics in Energy	1017 L Street #719 Sacramento, CA 95814	Electronic Service	No	OFF_SL_22-266_M-22-266
Jennifer	Peterson	jjpeterson@mnpower.com	Minnesota Power	30 West Superior Street Duluth, MN 55802	Electronic Service	No	OFF_SL_22-266_M-22-266
Catherine	Phillips	Catherine.Phillips@wecenergygroup.com	Minnesota Energy Resources	231 West Michigan St Milwaukee, WI 53203	Electronic Service	No	OFF_SL_22-266_M-22-266
Hannah	Polikov	hpolikov@aee.net	Advanced Energy Economy Institute	1000 Vermont Ave, Third Floor Washington, DC 20005	Electronic Service	No	OFF_SL_22-266_M-22-266
J. Gregory	Porter	greg.porter@nngco.com	Northern Natural Gas Company	1111 South 103rd St Omaha, NE 68124	Electronic Service	No	OFF_SL_22-266_M-22-266
Kevin	Pranis	kpranis@liunagro.com	Laborers' District Council of MN and ND	81 E Little Canada Road St. Paul, MN 55117	Electronic Service	No	OFF_SL_22-266_M-22-266
David G.	Prazak	dprazak@otpc.com	Otter Tail Power Company	P.O. Box 496 215 South Cascade Street Fergus Falls, MN 565380496	Electronic Service	No	OFF_SL_22-266_M-22-266
Greg	Pruszinske	gpruszinske@ci.becker.mn.us	City of Becker	PO Box 250 12060 Sherburne Ave Becker, MN 55308	Electronic Service	No	OFF_SL_22-266_M-22-266
Kenneth	Rance	krance@sabathani.org	Sabathani Community Center	310 East 38th St Rm #120 Minneapolis, MN 55409	Electronic Service	No	OFF_SL_22-266_M-22-266
Michael	Reinertson	michael.reinertson@avantenergy.com	Avant Energy	220 S. Sixth St. Ste 1300 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_22-266_M-22-266

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
John C.	Reinhardt	N/A	Laura A. Reinhardt	3552 26th Ave S Minneapolis, MN 55406	Paper Service	No	OFF_SL_22-266_M-22-266
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_22-266_M-22-266
Kevin	Reuther	kreuther@mncenter.org	MN Center for Environmental Advocacy	26 E Exchange St, Ste 206 St. Paul, MN 551011667	Electronic Service	No	OFF_SL_22-266_M-22-266
Isabel	Ricker	ricker@fresh-energy.org	Fresh Energy	408 Saint Peter Street Suite 220 Saint Paul, MN 55102	Electronic Service	No	OFF_SL_22-266_M-22-266
Noah	Roberts	nroberts@cleanpower.org	Energy Storage Association	1155 15th St NW, Ste 500 Washington, DC 20005	Electronic Service	No	OFF_SL_22-266_M-22-266
Susan	Romans	sromans@allete.com	Minnesota Power	30 West Superior Street Legal Dept Duulth, MN 55802	Electronic Service	No	OFF_SL_22-266_M-22-266
Nathaniel	Runke	nrunke@local49.org	International Union of Operating Engineers Local 49	611 28th St. NW Rochester, MN 55901	Electronic Service	No	OFF_SL_22-266_M-22-266
Robert K.	Sahr	bsahr@eastriver.coop	East River Electric Power Cooperative	P.O. Box 227 Madison, SD 57042	Electronic Service	No	OFF_SL_22-266_M-22-266
Joseph L	Sathe	jsathe@kennedy-graven.com	Kennedy & Graven, Chartered	150 S 5th St Ste 700 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_22-266_M-22-266
Elizabeth	Schmiesing	eschmiesing@winthrop.com	Winthrop & Weinstine, P.A.	225 South Sixth Street Suite 3500 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_22-266_M-22-266

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Jeff	Schneider	jeff.schneider@ci.red-wing.mn.us	City of Red Wing	315 West 4th Street Red Wing, MN 55066	Electronic Service	No	OFF_SL_22-266_M-22-266
Mark	Schoennauer	markwsch@hotmail.com		607 19th St NW Apt 17 Rochester, MN 55901	Electronic Service	No	OFF_SL_22-266_M-22-266
Peter	Scholtz	peter.scholtz@ag.state.mn.us	Office of the Attorney General-RUD	Suite 1400 445 Minnesota Street St. Paul, MN 55101-2131	Electronic Service	No	OFF_SL_22-266_M-22-266
Kay	Schraeder	kschraeder@minnkota.com	Minnkota Power	5301 32nd Ave S Grand Forks, ND 58201	Electronic Service	No	OFF_SL_22-266_M-22-266
Lori	Schultz	lorischultz@minncap.org	Minnesota Community Action Partnership	MCIT Building 100 Empire Dr Ste 202 St. Paul, MN 55103	Electronic Service	No	OFF_SL_22-266_M-22-266
Christine	Schwartz	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_22-266_M-22-266
Douglas	Seaton	doug.seaton@umwlc.org	Upper Midwest Law Center	8421 Wayzata Blvd Ste 300 Golden Valley, MN 55426	Electronic Service	No	OFF_SL_22-266_M-22-266
Dean	Sedgwick	Sedgwick@ItascaPower.com	Itasca Power Company	PO Box 455 Spring Lake, MN 56680	Electronic Service	No	OFF_SL_22-266_M-22-266
Maria	Seidler	maria.seidler@dom.com	Dominion Energy Technology	120 Tredegar Street Richmond, VA 23219	Electronic Service	No	OFF_SL_22-266_M-22-266
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th Pl E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_22-266_M-22-266

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates	7400 Lyndale Ave S Ste 190 Richfield, MN 55423	Electronic Service	No	OFF_SL_22-266_M-22-266
Patricia F	Sharkey	psharkey@environmentallawcounsel.com	Midwest Cogeneration Association.	180 N LaSalle St Ste 3700 Chicago, IL 60601	Electronic Service	No	OFF_SL_22-266_M-22-266
Andrew R.	Shedlock	Andrew.Shedlock@KutakRock.com	Kutak Rock LLP	60 South Sixth St Ste 3400 Minneapolis, MN 55402-4018	Electronic Service	No	OFF_SL_22-266_M-22-266
Doug	Shoemaker	dougs@charter.net	Minnesota Renewable Energy	2928 5th Ave S Minneapolis, MN 55408	Electronic Service	No	OFF_SL_22-266_M-22-266
Colleen	Sipiorski	Colleen.Sipiorski@wecenergygroup.com	Minnesota Energy Resources Corporation	700 North Adams St Green Bay, WI 54307	Electronic Service	No	OFF_SL_22-266_M-22-266
Edyta	Sitko	esitko@ucsusa.org	Union of Concerned Scientists	1 N Lasalle Ave CHICAGO, IL 60602	Electronic Service	No	OFF_SL_22-266_M-22-266
Anne	Smart	anne.smart@chargepoint.com	ChargePoint, Inc.	254 E Hacienda Ave Campbell, CA 95008	Electronic Service	No	OFF_SL_22-266_M-22-266
Ken	Smith	ken.smith@ever-greenenergy.com	Ever Green Energy	305 Saint Peter St Saint Paul, MN 55102	Electronic Service	No	OFF_SL_22-266_M-22-266
Beth	Smith	bsmith@greatermankato.com	Greater Mankato Growth	1961 Premier Dr Ste 100 Mankato, MN 56001	Electronic Service	No	OFF_SL_22-266_M-22-266
Trevor	Smith	trevor.smith@avantenergy.com	Avant Energy, Inc.	220 South Sixth Street Suite 1300 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_22-266_M-22-266

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.	76 W Kellogg Blvd St. Paul, MN 55102	Electronic Service	No	OFF_SL_22-266_M-22-266
Amanda	Smith	amanda.smith@state.mn.us	MN Pollution Control Agency	520 Lafayette Rd N St. Paul, MN 55155	Electronic Service	No	OFF_SL_22-266_M-22-266
Joshua	Smith	joshua.smith@sierraclub.org		85 Second St FL 2 San Francisco, CA 94105	Electronic Service	No	OFF_SL_22-266_M-22-266
Beth	Soholt	bsoholt@cleangridalliance.org	Clean Grid Alliance	570 Asbury Street Suite 201 St. Paul, MN 55104	Electronic Service	No	OFF_SL_22-266_M-22-266
Anna	Sommer	ASommer@energyfuturesgroup.com	Energy Futures Group	PO Box 692 Canton, NY 13617	Electronic Service	No	OFF_SL_22-266_M-22-266
Peggy	Sorum	peggy.sorum@centerpointenergy.com	CenterPoint Energy	505 Nicollet Mall Minneapolis, MN 55402	Electronic Service	No	OFF_SL_22-266_M-22-266
Mark	Spurr	mspurr@fvbenergy.com	International District Energy Association	222 South Ninth St., Suite 825 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_22-266_M-22-266
Jamez	Staples	jstaples@renewableenergypartners.com	Renewable Energy Partners	3033 Excelsior Blvd S Minneapolis, MN 55416	Electronic Service	No	OFF_SL_22-266_M-22-266
Byron E.	Starns	byron.starns@stinson.com	STINSON LLP	50 S 6th St Ste 2600 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_22-266_M-22-266

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Richard	Stasik	richard.stasik@wecenergygroup.com	Minnesota Energy Resources Corporation (HOLDING)	231 West Michigan St - P321 Milwaukee, WI 53203	Electronic Service	No	OFF_SL_22-266_M-22-266
Kristin	Stastny	kstastny@taftlaw.com	Taft Stettinius & Hollister LLP	2200 IDS Center 80 South 8th St Minneapolis, MN 55402	Electronic Service	No	OFF_SL_22-266_M-22-266
Cary	Stephenson	cStephenson@otpco.com	Otter Tail Power Company	215 South Cascade Street Fergus Falls, MN 56537	Electronic Service	No	OFF_SL_22-266_M-22-266
James M	Strommen	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered	150 S 5th St Ste 700 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_22-266_M-22-266
Eric	Swanson	eswanson@winthrop.com	Winthrop & Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_22-266_M-22-266
JB	Tengco	jtengco@bluegreenalliance.org	BlueGreen Alliance	2701 University Ave SE Ste. 209 Minneapolis, MN 55414	Electronic Service	No	OFF_SL_22-266_M-22-266
Stuart	Tommerdahl	stommerdahl@otpco.com	Otter Tail Power Company	215 S Cascade St PO Box 496 Fergus Falls, MN 56537	Electronic Service	No	OFF_SL_22-266_M-22-266
Pat	Treseler	pat.jcplaw@comcast.net	Paulson Law Office LTD	4445 W 77th Street Suite 224 Edina, MN 55435	Electronic Service	No	OFF_SL_22-266_M-22-266
Analeisha	Vang	avang@mnpower.com	Minnesota Power	30 W Superior St Duluth, MN 558022093	Electronic Service	No	OFF_SL_22-266_M-22-266
Julie	Voeck	julie.voeck@nee.com	NextEra Energy Resources, LLC	700 Universe Blvd Juno Beach, FL 33408	Electronic Service	No	OFF_SL_22-266_M-22-266

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Curt	Volkman	curt@newenergy-advisors.com	Fresh Energy	408 St Peter St Saint Paul, MN 55102	Electronic Service	No	OFF_SL_22-266_M-22-266
Roger	Warehime	roger.warehime@owatonna-utilities.com	Owatonna Municipal Public Utilities	208 S Walnut Ave PO BOX 800 Owatonna, MN 55060	Electronic Service	No	OFF_SL_22-266_M-22-266
Jenna	Warmuth	jwarmuth@mnpower.com	Minnesota Power	30 W Superior St Duluth, MN 55802-2093	Electronic Service	No	OFF_SL_22-266_M-22-266
Laurie	Williams	laurie.williams@sierraclub.org	Sierra Club	Environmental Law Program 1536 Wynkoop St Ste 200 Denver, CO 80202	Electronic Service	No	OFF_SL_22-266_M-22-266
Justin	Wilson	justin.wilson@chargepoint.com	ChargePoint	240 East Hacienda Ave. Campbell, CA 95008	Electronic Service	No	OFF_SL_22-266_M-22-266
Joseph	Windler	jwindler@winthrop.com	Winthrop & Weinstine	225 South Sixth Street, Suite 3500 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_22-266_M-22-266
Robyn	Woeste	robynwoeste@alliantenergy.com	Interstate Power and Light Company	200 First St SE Cedar Rapids, IA 52401	Electronic Service	No	OFF_SL_22-266_M-22-266
Tim	Wulling	t.wulling@earthlink.net		1495 Raymond Ave. Saint Paul, MN 55108	Electronic Service	No	OFF_SL_22-266_M-22-266
Yochi	Zakai	yzakai@smwlaw.com	SHUTE, MIHALY & WEINBERGER LLP	396 Hayes Street San Francisco, CA 94102	Electronic Service	No	OFF_SL_22-266_M-22-266

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Christopher	Zibart	czibart@atcllc.com	American Transmission Company LLC	W234 N2000 Ridgeview Pkwy Court Waukesha, WI 53188-1022	Electronic Service	No	OFF_SL_22-266_M-22-266
Kurt	Zimmerman	kwz@ibew160.org	Local Union #160, IBEW	2909 Anthony Ln St Anthony Village, MN 55418-3238	Electronic Service	No	OFF_SL_22-266_M-22-266
Emily	Ziring	eziring@stlouispark.org	City of St. Louis Park	5005 Minnetonka Blvd St. Louis Park, MN 55416	Electronic Service	No	OFF_SL_22-266_M-22-266
Patrick	Zomer	Pat.Zomer@lawmoss.com	Moss & Barnett PA	150 S 5th St #1200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_22-266_M-22-266

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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
John	Coffman	john@johncoffman.net	AARP	871 Tuxedo Blvd. St. Louis, MO 63119-2044	Electronic Service	No	OFF_SL_19-368_19-368_Official
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_19-368_19-368_Official
Jean	Comstock	jean.comstock.dbcc@gmail.com	St. Paul 350	729 6th St E St. Paul, MN 55106	Electronic Service	No	OFF_SL_19-368_19-368_Official
George	Crocker	gwillc@nawo.org	North American Water Office	5093 Keats Avenue Lake Elmo, MN 55042	Electronic Service	No	OFF_SL_19-368_19-368_Official
James	Denniston	james.r.denniston@xcelenergy.com	Xcel Energy Services, Inc.	414 Nicollet Mall, 401-8 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_19-368_19-368_Official
J.	Drake Hamilton	hamilton@fresh-energy.org	Fresh Energy	408 St Peter St Ste 350 Saint Paul, MN 55101	Electronic Service	No	OFF_SL_19-368_19-368_Official
Adam	Duininck	aduininck@ncsrcc.org	North Central States Regional Council of Carpenters	700 Olive Street St. Paul, MN 55130	Electronic Service	No	OFF_SL_19-368_19-368_Official
Brian	Edstrom	briane@cubminnesota.org	Citizens Utility Board of Minnesota	332 Minnesota St Ste W1360 Saint Paul, MN 55101	Electronic Service	No	OFF_SL_19-368_19-368_Official
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_19-368_19-368_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 551012198	Electronic Service	No	OFF_SL_19-368_19-368_Official
Mike	Fiterman	mikefiterman@libertydiversified.com	Liberty Diversified International	5600 N Highway 169 Minneapolis, MN 55428-3096	Electronic Service	No	OFF_SL_19-368_19-368_Official
Lucas	Franco	lfranco@liunagroc.com	LIUNA	81 Little Canada Rd E Little Canada, MN 55117	Electronic Service	No	OFF_SL_19-368_19-368_Official
Amy	Fredregill	afredregill@environmental-initiative.org	Environmental Initiative, MN Sustainable Growth Coalition	211 First St N Ste 250 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_19-368_19-368_Official
Edward	Garvey	edward.garvey@AESLconsulting.com	AESL Consulting	32 Lawton St Saint Paul, MN 55102-2617	Electronic Service	No	OFF_SL_19-368_19-368_Official
Todd J.	Guerrero	todd.guerrero@kutakrock.com	Kutak Rock LLP	Suite 1750 220 South Sixth Street Minneapolis, MN 554021425	Electronic Service	No	OFF_SL_19-368_19-368_Official
Kim	Havey	kim.havey@minneapolismn.gov	City of Minneapolis	350 South 5th Street, Suite 315M Minneapolis, MN 55415	Electronic Service	No	OFF_SL_19-368_19-368_Official
Philip	Hayet	phayet@jkenn.com	J. Kennedy and Associates, Inc.	570 Colonial Park Drive Suite 305 Roswell, GA 30075-3770	Electronic Service	No	OFF_SL_19-368_19-368_Official
Adam	Heinen	aheinen@dakotaelectric.com	Dakota Electric Association	4300 220th St W Farmington, MN 55024	Electronic Service	No	OFF_SL_19-368_19-368_Official
Annete	Henkel	mui@mutilityinvestors.org	Minnesota Utility Investors	413 Wacouta Street #230 St. Paul, MN 55101	Electronic Service	No	OFF_SL_19-368_19-368_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Kristin	Henry	kristin.henry@sierraclub.org	Sierra Club	2101 Webster St Ste 1300 Oakland, CA 94612	Electronic Service	No	OFF_SL_19-368_19-368_Official
Michael	Hoppe	lu23@ibew23.org	Local Union 23, I.B.E.W.	445 Etna Street Ste. 61 St. Paul, MN 55106	Electronic Service	No	OFF_SL_19-368_19-368_Official
Alan	Jenkins	aj@jenkinsatlaw.com	Jenkins at Law	2950 Yellowtail Ave. Marathon, FL 33050	Electronic Service	No	OFF_SL_19-368_19-368_Official
Richard	Johnson	Rick.Johnson@lawmoss.com	Moss & Barnett	150 S. 5th Street Suite 1200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-368_19-368_Official
Sarah	Johnson Phillips	sarah.phillips@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-368_19-368_Official
William D	Kenworthy	will@votesolar.org	Vote Solar	332 S Michigan Ave FL 9 Chicago, IL 60604	Electronic Service	No	OFF_SL_19-368_19-368_Official
Samuel B.	Ketchum	sketchum@kennedy-graven.com	Kennedy & Graven, Chartered	150 S 5th St Ste 700 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-368_19-368_Official
Frank	Kohlasch	frank.kohlasch@state.mn.us	MN Pollution Control Agency	520 Lafayette Rd N. St. Paul, MN 55155	Electronic Service	No	OFF_SL_19-368_19-368_Official
Brian	Kolbinger	brian@beckertownship.org	Becker Township Board	PO Box 248 12165 Hancock St Becker, MN 55308	Electronic Service	No	OFF_SL_19-368_19-368_Official
Kay	Kuhlmann	Teri.Swanson@ci.red-wing.mn.us	City Of Red Wing	315 West Fourth Street Red Wing, MN 55066	Electronic Service	No	OFF_SL_19-368_19-368_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Brenda	Kyle	bkyle@stpaulchamber.com	St. Paul Area Chamber of Commerce	401 N Robert Street Suite 150 St Paul, MN 55101	Electronic Service	No	OFF_SL_19-368_19-368_Official
Carmel	Laney	carmel.laney@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-368_19-368_Official
Peder	Larson	plarson@larkinhoffman.com	Larkin Hoffman Daly & Lindgren, Ltd.	8300 Norman Center Drive Suite 1000 Bloomington, MN 55437	Electronic Service	No	OFF_SL_19-368_19-368_Official
Rachel	Leonard	rachel.leonard@ci.monticello.mn.us	City of Monticello	505 Walnut St Ste 1 Monticello, MN 55362	Electronic Service	No	OFF_SL_19-368_19-368_Official
Annie	Levenson Falk	annief@cupminnesota.org	Citizens Utility Board of Minnesota	332 Minnesota Street, Suite W1360 St. Paul, MN 55101	Electronic Service	No	OFF_SL_19-368_19-368_Official
Alice	Madden	alice@communitypowermn.org	Community Power	2720 E 22nd St Minneapolis, MN 55406	Electronic Service	No	OFF_SL_19-368_19-368_Official
Kavita	Maini	kmairi@wi.rr.com	KM Energy Consulting, LLC	961 N Lost Woods Rd Oconomowoc, WI 53066	Electronic Service	No	OFF_SL_19-368_19-368_Official
Emily	Marshall	emarshall@mojlaw.com	Miller O'Brien Jensen, PA	120 S. 6th Street Suite 2400 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-368_19-368_Official
Mary	Martinka	mary.a.martinka@xcelenergy.com	Xcel Energy Inc	414 Nicollet Mall 7th Floor Minneapolis, MN 55401	Electronic Service	No	OFF_SL_19-368_19-368_Official
Gregg	Mast	gmast@cleanenergyeconomy.mn.org	Clean Energy Economy Minnesota	4808 10th Avenue S Minneapolis, MN 55417	Electronic Service	No	OFF_SL_19-368_19-368_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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	OFF_SL_19-368_19-368_Official
Taylor	McNair	taylor@gridlab.org		668 Capp Street San Francisco, CA 94110	Electronic Service	No	OFF_SL_19-368_19-368_Official
Melanie	Mesko Lee	Melanie.Lee@burnsvillemn.gov	City of Burnsville	100 Civic Center Parkway Burnsville, MN 55337-3867	Electronic Service	No	OFF_SL_19-368_19-368_Official
Joseph	Meyer	joseph.meyer@ag.state.mn.us	Office of the Attorney General-RUD	Bremer Tower, Suite 1400 445 Minnesota Street St Paul, MN 55101-2131	Electronic Service	No	OFF_SL_19-368_19-368_Official
Stacy	Miller	stacy.miller@minneapolismn.gov	City of Minneapolis	350 S. 5th Street Room M 301 Minneapolis, MN 55415	Electronic Service	No	OFF_SL_19-368_19-368_Official
David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022093	Electronic Service	No	OFF_SL_19-368_19-368_Official
Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP	33 South Sixth St Ste 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-368_19-368_Official
Evan	Mulholland	emulholland@mncenter.org	Minnesota Center for Environmental Advocacy	1919 University Ave W Ste 515 Saint Paul, MN 55101	Electronic Service	No	OFF_SL_19-368_19-368_Official
Alan	Muller	alan@greendel.org	Energy & Environmental Consulting	1110 West Avenue Red Wing, MN 55066	Electronic Service	No	OFF_SL_19-368_19-368_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Carl	Nelson	cnelson@mncee.org	Center for Energy and Environment	212 3rd Ave N Ste 560 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_19-368_19-368_Official
David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency	220 South Sixth Street Suite 1300 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-368_19-368_Official
M. William	O'Brien	bobrien@mojlaw.com	Miller O'Brien Jensen, P.A.	120 S 6th St Ste 2400 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-368_19-368_Official
Ric	O'Connell	ric@gridlab.org	GridLab	2120 University Ave Berkeley, CA 94704	Electronic Service	No	OFF_SL_19-368_19-368_Official
Carol A.	Overland	overland@legalelectric.org	Legalelectric - Overland Law Office	1110 West Avenue Red Wing, MN 55066	Electronic Service	No	OFF_SL_19-368_19-368_Official
Jessica	Palmer Denig	jessica.palmer-Denig@state.mn.us	Office of Administrative Hearings	600 Robert St N PO Box 64620 St. Paul, MN 55164	Electronic Service	No	OFF_SL_19-368_19-368_Official
J. Gregory	Porter	greg.porter@nngco.com	Northern Natural Gas Company	1111 South 103rd St Omaha, NE 68124	Electronic Service	No	OFF_SL_19-368_19-368_Official
Greg	Pruszinske	gpruszinske@ci.becker.mn.us	City of Becker	PO Box 250 12060 Sherburne Ave Becker, MN 55308	Electronic Service	No	OFF_SL_19-368_19-368_Official
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_19-368_19-368_Official
Kevin	Reuther	kreuther@mncenter.org	MN Center for Environmental Advocacy	26 E Exchange St, Ste 206 St. Paul, MN 551011667	Electronic Service	No	OFF_SL_19-368_19-368_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Nathaniel	Runke	nrunke@local49.org	International Union of Operating Engineers Local 49	611 28th St. NW Rochester, MN 55901	Electronic Service	No	OFF_SL_19-368_19-368_Official
Joseph L	Sathe	jsathe@kennedy-graven.com	Kennedy & Graven, Chartered	150 S 5th St Ste 700 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-368_19-368_Official
Jeff	Schneider	jeff.schneider@ci.red-wing.mn.us	City of Red Wing	315 West 4th Street Red Wing, MN 55066	Electronic Service	No	OFF_SL_19-368_19-368_Official
Mark	Schoennauer	markwsch@hotmail.com		607 19th St NW Apt 17 Rochester, MN 55901	Electronic Service	No	OFF_SL_19-368_19-368_Official
Christine	Schwartz	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_19-368_19-368_Official
Douglas	Seaton	doug.seaton@umwlc.org	Upper Midwest Law Center	8421 Wayzata Blvd Ste 300 Golden Valley, MN 55426	Electronic Service	No	OFF_SL_19-368_19-368_Official
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th Pl E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_19-368_19-368_Official
Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates	7400 Lyndale Ave S Ste 190 Richfield, MN 55423	Electronic Service	Yes	OFF_SL_19-368_19-368_Official
Andrew R.	Shedlock	Andrew.Shedlock@KutakRock.com	Kutak Rock LLP	60 South Sixth St Ste 3400 Minneapolis, MN 55402-4018	Electronic Service	No	OFF_SL_19-368_19-368_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Edyta	Sitko	esitko@ucsusa.org	Union of Concerned Scientists	1 N Lasalle Ave CHICAGO, IL 60602	Electronic Service	No	OFF_SL_19-368_19-368_Official
Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.	76 W Kellogg Blvd St. Paul, MN 55102	Electronic Service	No	OFF_SL_19-368_19-368_Official
Beth	Smith	bsmith@greatermankato.com	Greater Mankato Growth	1961 Premier Dr Ste 100 Mankato, MN 56001	Electronic Service	No	OFF_SL_19-368_19-368_Official
Joshua	Smith	joshua.smith@sierraclub.org		85 Second St FL 2 San Francisco, CA 94105	Electronic Service	No	OFF_SL_19-368_19-368_Official
Beth	Soholt	bsoholt@cleangridalliance.org	Clean Grid Alliance	570 Asbury Street Suite 201 St. Paul, MN 55104	Electronic Service	No	OFF_SL_19-368_19-368_Official
Anna	Sommer	ASommer@energyfuturesgroup.com	Energy Futures Group	PO Box 692 Canton, NY 13617	Electronic Service	No	OFF_SL_19-368_19-368_Official
Mark	Spurr	mspurr@fvbenergy.com	International District Energy Association	222 South Ninth St., Suite 825 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-368_19-368_Official
Byron E.	Starns	byron.starns@stinson.com	STINSON LLP	50 S 6th St Ste 2600 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-368_19-368_Official
James M	Strommen	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered	150 S 5th St Ste 700 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-368_19-368_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Eric	Swanson	eswanson@winthrop.com	Winthrop & Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_19-368_19-368_Official
Julie	Voeck	julie.voeck@nee.com	NextEra Energy Resources, LLC	700 Universe Blvd Juno Beach, FL 33408	Electronic Service	No	OFF_SL_19-368_19-368_Official
Laurie	Williams	laurie.williams@sierraclub.org	Sierra Club	Environmental Law Program 1536 Wynkoop St Ste 200 Denver, CO 80202	Electronic Service	No	OFF_SL_19-368_19-368_Official
Joseph	Windler	jwindler@winthrop.com	Winthrop & Weinstine	225 South Sixth Street, Suite 3500 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-368_19-368_Official
Tim	Wulling	t.wulling@earthlink.net		1495 Raymond Ave. Saint Paul, MN 55108	Electronic Service	No	OFF_SL_19-368_19-368_Official
Kurt	Zimmerman	kwz@ibew160.org	Local Union #160, IBEW	2909 Anthony Ln St Anthony Village, MN 55418-3238	Electronic Service	No	OFF_SL_19-368_19-368_Official
Emily	Ziring	eziring@stlouispark.org	City of St. Louis Park	5005 Minnetonka Blvd St. Louis Park, MN 55416	Electronic Service	No	OFF_SL_19-368_19-368_Official
Patrick	Zomer	Pat.Zomer@lawmoss.com	Moss & Barnett PA	150 S 5th St #1200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-368_19-368_Official