

April 30, 2026

Sasha Bergman
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, Minnesota 55101-2147

RE: Comments of the Minnesota Department of Commerce
Docket No. E999/CI-20-800

Dear Ms. Bergman,

Attached are the comments of the Minnesota Department of Commerce (Department) in the following matter:

*In the Matter of a Commission Investigation on Grid and Customer Security Issues
Related to Public Display or Access to Electric Distribution Grid Data*

The Grid Data Sharing Framework Report was filed by Converge Strategies, LLC. (Converge) on March 3, 2026.

The Department recommends the Commission accept the Report and implement the Grid Data Sharing Framework and is available to answer any questions the Minnesota Public Utilities Commission may have.

Sincerely,

/s/ Dr. SYDNIE LIEB
Assistant Commissioner of Regulatory Analysis

RW/ar
Attachment

Before the Minnesota Public Utilities Commission

Comments of the Minnesota Department of Commerce

Docket No. E999/CI-20-800

I. INTRODUCTION

The present docket represents years of stakeholder work to address ongoing grid and customer security concerns related to the sharing of grid data. The Commission’s 2020 Order on Xcel Energy’s 2019 Hosting Capacity Analysis (HCA) Report delegated authority to the Executive Secretary to open a Commission investigation on grid and customer security issues related to public display or access to grid data.¹ Since the docket was opened in 2020, the Commission has accepted multiple rounds of stakeholder feedback and updates to the record, which have resulted in the formation of the Grid Security Working Group (GSWG) in 2025.² The Minnesota Department of Commerce obtained technical assistance from Converge Strategies, LLC. (Converge) to both facilitate the GSWG as well as aid in appropriately addressing grid security concerns raised by stakeholders throughout the docket history. The goal of the workgroup was not full consensus, but collaboration toward a workable solution.

As ordered by the Commission, the workgroup was tasked with providing recommendations for a process for securely sharing the necessary data for DER interconnection.³ In the same Order, the Commission approved the usage of the NARUC Grid Data Sharing Framework Playbook (NARUC Playbook) as a model, but not a binding manual for the GSWG’s work.⁴ The GSWG, under the guidance of Converge and the NARUC Playbook, focused on three main topics: 1) use case analysis, 2) data sharing capabilities, and data sharing mechanisms.⁵ The Report filed by Converge on March 4, 2026 represents the outcomes of the GSWG and the proposed process for securely sharing grid data.⁶

The Department commends Converge and workgroup participants for their collaborative effort and overall high level of participation in the three workgroup sessions. Although the Converge Report does not represent full consensus from parties, the Department concludes that the Report and the Framework therein provide a path forward—grounded in utility, developer and regulatory collaboration—for the secure sharing of grid data to facilitate DER interconnection. The Department also believes that the conversations held within the stakeholder group bode well for continued security/risk assessment collaboration. The Department also notes that the Converge Report lays out

¹ *In the Matter of Xcel’s 2019 Hosting Capacity Analysis Report, Order Accepting and Setting Further Requirements*, July 31, 2020, Docket No. E002/M-19-685, (eDockets) [20207-165472-01](#), at Order Point 19.

² *In the Matter of the Commission Investigation on Grid and Customer Security Issues Related to Public Display or Access to Electric Distribution Grid Data, Order Accepting Report, Establishing Standing Workgroup, and assigning procedures and tasks for the Workgroup*, February 7, 2025, Docket No. E-999/CI-20-800, (eDockets) [20252-215085-01](#) (hereinafter: “February 2025 Order”).

³ *Id.*, at order point 4.

⁴ February 2025 Order, at order point 3.

⁵ *Id.*, at order point 6.

⁶ *In the Matter of a Commission Investigation on Grid and Customer Security Issues Related to Public Display or Access to Electric Distribution Grid Data*, Converge Strategies, LLC., Recommendations for a Grid Data Sharing Framework, March 4, 2026, Docket No. E999/CI-20-800, (eDockets) [202410-210841-01](#) (hereinafter “Converge Report”).

an evaluation process that would allow for iteration on the Framework should stakeholders find that the process requires updates.

II. PROCEDURAL BACKGROUND

June 7, 2023	The Minnesota Public Utilities Commission (Commission) issued an Order in Docket No. E999/CI-20-800 which, among other items, convened a work group to develop the record more fully for Commission consideration within 18 months and requested the Department retain specialty services to provide a recommendation on privacy and security and to participate in related analysis and stakeholder engagement. ⁷ The Department subsequently selected Converge Strategies, LLC (Converge) to provide the required specialty services.
July 2, 2024	The Commission issued a notice of work group to commence the process required by the 2023 Order for meetings later in the summer. ⁸
August 28, 2024 and October 4, 2024	The Commission issued draft notes of the three Commission-led workgroup meetings. ⁹
October 9, 2024	The Commission issued its mid-workgroup report with a summary of the discussions, conclusions, recommendations, next steps, and remaining points of disagreement. ¹⁰ The Workgroup Report formally submitted into the record the NARUC framework. ¹¹ The Commission issued its Notice of Supplemental Comment Period in the present docket. ¹²
October 28, 2024	The Department convened the first workgroup session in parallel with the supplemental comment period, facilitated by Converge, to present

⁷ *In the Matter of a Commission Investigation on Grid and Customer Security Issues Related to Public Display or Access to Electric Distribution Grid Data, Order Establishing Work Group*, June 7, 2023, Docket No. E999/CI-20-800, (eDockets) [20236-196417-02](#).

⁸ *In the Matter of a Commission Investigation on Grid and Customer Security Issues Related to Public Display or Access to Electric Distribution Grid Data, Notice of Comment Period*, July 2, 2024, Docket Nos. E999/CI-20-800, (eDockets) [20247-208237-01](#).

⁹ *In the Matter of a Commission Investigation on Grid and Customer Security Issues Related to Public Display or Access to Electric Distribution Grid Data, Notes from Workshops 1 and 2*, August 19, 2024, Docket No. E999/CI-20-800, (eDockets) [20248-209599-01](#); *In the Matter of a Commission Investigation on Grid and Customer Security Issues Related to Public Display or Access to Electric Distribution Grid Data, Workgroup Session 3 Notes*, October 4, 2024, Docket No. E999/CI-20-800, (eDockets) [202410-210725-01](#).

¹⁰ *In the Matter of a Commission Investigation on Grid and Customer Security Issues Related to Public Display or Access to Electric Distribution Grid Data, Workgroup Report*, October 9, 2024, Docket No. E999/CI-20-800, (eDockets) [202410-210841-01](#) (hereinafter “2024 Workgroup Report”).

¹¹ 2024 Workgroup Report Attachment 1.

¹² *In the Matter of a Commission Investigation on Grid and Customer Security Issues Related to Public Display or Access to Electric Distribution Grid Data, Notice of Supplemental Comment Period*, October 9, 2024, Docket No. E999/CI-20-800, (eDockets) [202410-210840-01](#).

Converge's initial findings and framework proposal and to plan for the proposed standing workgroup.

February 7, 2025

The Commission issued an Order accepting the Workgroup Report, delegated authority to the Executive Secretary to establish and maintain an ongoing workgroup to review the implementation of grid data sharing practices and bring recommendations to the Commission as needed, and requesting that the Commissioner of Commerce seek authority to incur costs for further specialty services to facilitate three workshops to specifically address the following: use case analysis, data protection capabilities, and data sharing mechanisms.¹³

July 7, August 11, and October 6, 2025

Converge and the Department of Commerce convened stakeholders for a series of three Commission-ordered workshops on data protection capabilities, data sharing mechanisms, and use case analysis, respectively.

March 4, 2026

Converge filed its Recommendations for a Grid Data Sharing Framework final report into the instant docket; the report summarized the information and perspectives shared by workgroup participants and provided recommendations regarding the development of a standardized data request template and review process.¹⁴

March 31, 2026

The Commission issued its Notice of Comment Period asking stakeholders to provide input on the question of whether the Commission should accept the Report and implement the proposed Grid Data Sharing Framework.¹⁵

Topic(s) open for comment:

- Should the Commission accept, modify, or reject the Grid Data Sharing Framework Report submitted into the record on March 4, 2026?
- Should the Commission accept, modify, or reject the Framework's appeals process? Specifically, should the Commission accept, modify, or reject the use of the Grid Security Working Group to address informal complaints to minimize submittal to CAO?
- Should the Commission accept, modify, or reject the framework's evaluation recommendations?
- Are there other issues or concerns related to this matter?

¹³ February 2025 Order.

¹⁴ Converge Report.

¹⁵ *In the Matter of a Commission Investigation on Grid and Customer Security Issues Related to Public Display or Access to Electric Distribution Grid Data, Notice of Comment Period*, March 31, 2026, Docket No. E999/CI-20-800, (eDockets) [20263-229850-01](#).

III. DEPARTMENT ANALYSIS

The Converge Report is a culmination of many hours of collaborative work amongst stakeholders and cybersecurity subject matter experts representing the following organizations in the state of Minnesota:

- Citizen’s Utility Board
- Clean Energy Economy Minnesota (CEEM)
- Dakota Electric Association
- Fresh Energy
- Minnesota Attorney General’s Office
- Minnesota Bureau of Criminal Apprehension/MN Fusion Center
- Minnesota Department of Commerce
- Minnesota Information Technology Services (MNIT)
- Minnesota Power
- Minnesota Public Utilities Commission
- Minnesota Solar Energy Industries Association (MnSEIA)
- Nokomis Energy
- Otter Tail Power
- R Street Institute
- U.S. Solar
- Xcel Energy

This level of participation and continued engagement across the industry is commendable. The participation from utilities, developers, and state agencies represents the shared understanding of the importance of the work at hand. The Department is further pleased that the parties have demonstrated a continuing willingness to devote the requisite time and resources to improving the safety and security of the electrical grid in Minnesota. The Department recognizes that complete consensus surrounding the classification of grid data risk and mitigation of that risk to enable sharing will be nearly impossible to achieve; however, the Department believes the work undertaken by parties to the GSWG represents a collaborative stride forward.

Furthermore, the Department reiterates its position that “the state’s ability to meet its policy objectives regarding clean energy deployment, such as the 2040 carbon-free standard, the Distributed Solar Energy Standard (DSES), or the community solar garden (CSG) program, among others, is heavily impacted by decisions regarding data access.”¹⁶ As distribution planning undergoes an exponential increase in the sheer volume of data required to efficiently plan and operate the distribution system, it is more critical than ever that market participants and project developers maintain equitable access to the data required for cost-efficient and safe realization of Minnesota’s clean energy goals.

¹⁶ *In the Matter of a Commission Investigation on Grid and Customer Security Issues Related to Public Display or Access to Electric Distribution Grid Data*, Department Comments, November 12, 2024, Docket No. E999/CI-20-800, (eDockets) [202411-211847-01](#) at 4.

A. ACCEPT, MODIFY OR REJECT THE REPORT

The Department responds to the following Notice Topic:

Should the Commission accept, modify, or reject the Grid Data Sharing Framework Report submitted into the record on March 4, 2026?

Throughout the Workgroup process, Converge utilized the NARUC Playbook to guide discussion and the ultimate formation of the Framework.¹⁷ Guided by the NARUC Playbook, the workgroup examined use cases, current practices, desired outcomes, potential impacts and data sharing practices to enable the most transparent level of sharing while mitigating potential negative grid impacts.¹⁸ Converge focused each session on one the of topics highlighted by the Commission in its February 2025 Order: use case analysis, data protection capabilities, and data sharing mechanisms.¹⁹ Each session of the GSWG is detailed in a session After Action Report attached to the Converge Report.²⁰ The Department briefly summarizes each session below.

At the July 2025 Workgroup session, the Workgroup worked to define low-, medium-, and high-risk data as well as the appropriate protection measures for the security level of the data. The group discussed how data in each level could be made shareable.²¹ The table below briefly restates the key findings, as discussed in the July After Action Report (attached to the Converge Report), related to the classification of data risk, the definition of the classification, and the protection measures that could be employed to make the data shareable:

Table 1: Risk Categories, Definitions and Protections

Risk Category	Definition	Protection Measures
Low-Risk	Non-public data unlikely to cause harm without significant aggregation effort or other prior non-public knowledge. Low risk data has minimal potential to cause system impact or disrupt daily operations.	General NDAs, attestations, or documentation of the request as sufficient measures.
Medium-Risk	Non-public data that is less sensitive than high risk data, but could still cause harm if	Access controls and requester vetting and training, may be

¹⁷ February 2025 Order at Order Point 3.

¹⁸ Constantini, L. P., Sass Byrnett, D., Stafford, B., and Villarreal, C. *NARUC Grid Data Sharing Playbook [pdf]*, National Association of Regulatory Utility Commissioners, (2023). At 4. Retrieved from: <https://pubs.naruc.org/pub/E2E50FD7-CD1B-62D5-1071-8D8362AD1E6D>, (hereinafter: "NARUC Playbook").

¹⁹ February 2025 Order at order point 6.

²⁰ Converge Report, Appendices A, B, and C.

²¹ Converge Report, Appendix A, at 26-27.

	mishandled. Potential impacts are lower (e.g., short duration disruptions impacting fewer customers), but they are still significant and can typically be prevented or mitigated with proper safeguards.	appropriate for medium risk data.
High-Risk	Non-public data that could jeopardize the integrity of the entire electric grid, creates risk to state or national security, and carries a significant risk of operational disruptions with widespread impacts (e.g., risk to critical infrastructure).	Strict access control (e.g., sharing within a portal or via secured video conference), training requirements for requesters, and requester vetting.

Source: July 2025 After Action Report, Appendix A.²²

At the August 2025 Workgroup session, the group discussed the prerequisites for submitting a data request application, as well as standard items that should be included in the applications. The August 2025 session also included discussions regarding the timeline for a utility to respond to a request for data and the appropriate appeals process.²³ As stated in the Report, participants identified that essential information to be included in the application would broadly include:

[W]hether anyone other than the applicant would need access to the data (including third parties), a clearly articulated need and justification, data type (e.g. equipment, load, capacity), validation of a passed background check (source TBD), and the period of time the requester would need access to the data in order to fulfill their requirements. Some ‘nice to have’ information included the requester’s plans to develop public-facing derivative products from the data or whether they planned to input it into an AI, information about their data handling and data security practices, the geographic locations associated with the data, and the time period the data originates from (e.g. the last twelve months, the last three years).²⁴

The Workgroup broadly agreed that the most important aspect of the data request application process was clear and consistent communication about the process. The Workgroup also emphasized “shared expectations” between the utility and the requestor.²⁵ Participants largely agreed that three months or 90 days would be a reasonable guideline for response to a data request.²⁶ Participants also highlighted

²² Converge Report, Appendix A, at 26-27.

²³ Converge Report, Appendix B, at 47.

²⁴ Converge Report, Appendix B, at 48.

²⁵ *Ibid.*

²⁶ *Id.*, at 49.

that a portal or tracker through which the requestor could monitor the progression of their request through the utility's process could be a tool to manage expectations and facilitate communication about the status of the party's request.²⁷

At the final session of the GSWG (the October 2025 session), the Workgroup examined use cases utilizing the processes set up in the first two sessions.²⁸ Each small group was given a use case and discussed the risk level of the data requested as well as any potential risk mitigations or data protections that could be used to make the data shareable.²⁹ The Workgroup found that, often, one data protection method is not sufficient to protect the data—a combination of several is often appropriate to mitigate risk, depending on the risk level of the data requested. Participants also agreed that secure sharing methods are critical as requestors often have varying levels of data sharing training, and technological capabilities. Participants offered that a portal for sharing data (similar across utilities) might be the simplest and most uniform method to share data.³⁰

The Department finds the overall workgroup process to be consistent with the Commission directive in its February 2025 Order to utilize the NARUC playbook as a guide.³¹ The Department also concludes that the Converge Report details the stakeholder process and the consensus items that came from the three sessions tailored to the Commission's identified focus areas in the February 2025 Order.³² Further, the Department notes that participants in the Workgroup have had the opportunity to review each After Action Report as well as the final draft of the Report and provide edits prior to filing. The Department concludes that the Report is complete and representative of the Workgroup process.

The Department recommends the Commission accept the Report and implement the framework therein.

B. APPEALS PROCESS

The Department responds to the following Notice Topic:

Should the Commission accept, modify, or reject the Framework's appeals process? Specifically, should the Commission accept, modify, or reject the use of the Grid Security Working Group to address informal complaints to minimize submittal to CAO?

²⁷ *Id.*, at 49.

²⁸ Converge Report, Appendix C, at 77; Note: examples of the participants' small group use cases begin on page 82 of Appendix C.

²⁹ *Ibid.*

³⁰ *Id.*, at 78.

³¹ February 2025 Order at Order Point 3. Note that the Commission approved the use of the NARUC Playbook, but clarified the NARUC Playbook was not a binding manual for the workgroup.

³² February 2025 Order, at Order Point 6.

As stated in the Report:

If a requester believes their application has been unfairly categorized or denied, they should make a good faith effort to resolve the dispute with the utility. However, if a mutually satisfactory resolution cannot be reached and the requester still believes their request has been unfairly categorized or denied the Grid Security Working Group (GSWG)—here proposed as a subcommittee of the Distributed Generation Working Group (DGWG)—is the body with whom it is most appropriate to file informal complaints.

The ideological genesis of the GSWG was first established by the Commission’s June 7, 2023, Order in Docket No. E-999/CI-20-800. The Order delegated authority to the Executive Secretary to convene the appropriate parties in a work group and develop the record around frameworks for securely sharing appropriate grid data more fully. The Commission’s February 7, 2025, Order in the same docket established the body as an ongoing workgroup under the Commission’s authority to address matters associated with the efforts discussed within these recommendations. This makes the GSWG the ideal forum for receiving informal complaints related to the grid data sharing process going forward.³³

The Department agrees with this assertion made in the Report. The Grid Security Working Group has so far proven to be a collaborative and solution driven group. The Department notes that, as the Workgroup proceeded through each session, the participants continued to identify and include relevant subject matter experts from their organizations in the Workgroup, dependent on the topic up for discussion each session. The Department appreciates the commitment demonstrated by the participants to ensure the relevant experts were available to participate and provide feedback on the discussions. Should this commitment continue, the Department is confident the Workgroup could work through appeals.

The Department recommends the Commission accept the use of the Grid Security Working Group to address informal complaints.

³³ Converge Report, at 18.

C. EVALUATION

The Department responds to the following Notice topic:

Should the Commission accept, modify, or reject the framework's evaluation recommendations?

In its Report, Converge recommends annual reporting as well as a fulsome review of the Framework three years after implementation. The Department likens this reporting and review cycle to the term of a pilot project in other proceedings. Should the proposed Framework prove to be incomplete or ineffectual, the annual reporting and review after three years should demonstrate the need for modification.

The Department recommends the Commission accept the Framework's evaluation recommendations. The Department specifies the recommendations below.

The Department recommends the Commission require annual reporting by each of the rate-regulated utilities in the current docket. The Department recommends the Commission adopt the following reporting metrics:

- **Total number of data requests per utility, per year.**
- **Total number of fulfilled requests per utility, per year.**
- **Total number of denied requests per utility, per year.**
- **Total number of fulfilled requests for each risk level (high-, medium-, and low-risk), per year.**
- **Reasons why requests (if any) were denied, per year.**
- **How many requests were brought to the GSWG for dispute resolution, with an explanation of why the dispute occurred (e.g., why request was denied, timeline of remediation efforts between the utility and requester, and statements of position and desired outcome by both the dispute initiator and responder), per year.**
- **Average fulfillment time for requests per utility, per year.**
- **List of requesters for the year from each utility, per year.**
- **Any data breaches from requesters who have been given data that each utility knows of, per year**

The Department recommends the Commission delegate authority to the executive Secretary to issue a Notice of Comment Period following the third annual report in the present docket to determine if there are modifications needed to the Framework or the reporting metrics/cadence.

D. OTHER ISSUES

The Department responds to the following Notice topic:

Are there other issues or concerns related to this matter?

The Department has no further concerns at this time.

IV. DEPARTMENT RECOMMENDATIONS

Based on analysis of the Converge Report, participation in the stakeholder workgroup, and the information in the record, the Department has prepared recommendations, which are provided below. The recommendations correspond to the subheadings of Section III above.

A. *ACCEPT, MODIFY OR DENY REPORT*

- The Department recommends the Commission accept the Report and implement the framework therein.

B. *APPEALS PROCESS*

- The Department recommends the Commission accept the use of the Grid Security Working Group to address informal complaints.

C. *EVALUATION*

- The Department recommends the Commission accept the Framework's evaluation recommendations. The Department specifies the recommendations below.
- The Department recommends the Commission require annual reporting by each of the rate-regulated utilities in the current docket. The Department recommends the Commission adopt the following reporting metrics:
 - Total number of data requests per utility, per year.
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 - Total number of denied requests per utility, per year.
 - Total number of fulfilled requests for each risk level (high-, medium-, and low-risk), per year.
 - Reasons why requests (if any) were denied, per year.
 - How many requests were brought to the GSWG for dispute resolution, with an explanation of why the dispute occurred (e.g., why request was denied, timeline of remediation efforts between the utility and requester, and statements of position and desired outcome by both the dispute initiator and responder), per year.
 - Average fulfillment time for requests per utility, per year.
 - List of requesters for the year from each utility, per year.
 - Any data breaches from requesters who have been given data that each utility knows of, per year
- The Department recommends the Commission delegate authority to the executive Secretary to issue a Notice of Comment Period following the third annual report in the present docket to determine if there are modifications needed to the Framework or the reporting metrics/cadence.

CERTIFICATE OF SERVICE

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

Minnesota Department of Commerce
Comments

Docket No. E999/CI-20-800

Dated this **30th** day of **April 2026**

/s/Sharon Ferguson

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39	Nicolle	Kupser	nkupser@greatermngas.com	Greater Minnesota Gas, Inc.		1900 Cardinal Ln PO Box 798 Faribault MN, 55021 United States	Electronic Service		No	20-800Official
40	Brenda	Kyle	bkyle@stpaulchamber.com	St. Paul Area Chamber of Commerce		401 N Robert Street Suite 150 St Paul MN, 55101 United States	Electronic Service		No	20-800Official
41	Annie	Levenson Falk	annielf@cubminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota Street, Suite W1360 St. Paul MN, 55101 United States	Electronic Service		No	20-800Official
42	Todd	Liljenquist	todd.liljenquist@mmha.com	Minnesota Multi Housing Association (MHA)		1600 West 82nd Street, Suite 110 Minneapolis MN, 55431 United States	Electronic Service		No	20-800Official
43	Kavita	Maini	kmairi@wi.rr.com	KM Energy Consulting, LLC		961 N Lost Woods Rd Oconomowoc WI, 53066 United States	Electronic Service		No	20-800Official
44	Christine	Marquis	regulatory.records@xcelenergy.com	Xcel Energy		414 Nicollet Mall MN1180-07-MCA Minneapolis MN, 55401 United States	Electronic Service		No	20-800Official
45	J.B.	Matthews		Cushman & Wakefield/NorthMarq		3500 American Blvd W - #200 Minneapolis MN, 55431 United States	Paper Service		No	20-800Official
46	Craig	McDonnell	craig.mcdonnell@state.mn.us		Minnesota Pollution Control Agency	520 Lafayette Road St. Paul MN, 55101 United States	Electronic Service		No	20-800Official
47	Matthew	Melewski	matthew@theboutiquefirm.com	Nokomis Energy LLC & Ole Solar LLC		2639 Nicollet Ave Ste 200 Minneapolis MN, 55408 United States	Electronic Service		No	20-800Official
48	Joseph	Meyer	joseph.meyer@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	Bremer Tower, Suite 1400 445 Minnesota Street St Paul MN, 55101-2131 United States	Electronic Service		No	20-800Official
49	Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP		33 South Sixth St Ste 4200 Minneapolis MN, 55402 United States	Electronic Service		No	20-800Official
50	Pouya	Najmaie	najm0001@gmail.com	Cooperative Energy Futures		3416 16th Ave S Minneapolis MN, 55407 United States	Electronic Service		No	20-800Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
51	David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency		220 South Sixth Street Suite 1300 Minneapolis MN, 55402 United States	Electronic Service		No	20-800Official
52	Samantha	Norris	samanthanorris@alliantenergy.com	Interstate Power and Light Company		200 1st Street SE PO Box 351 Cedar Rapids IA, 52406-0351 United States	Electronic Service		No	20-800Official
53	Logan	O'Grady	logrady@mnseia.org	Minnesota Solar Energy Industries Association		2288 University Ave W St. Paul MN, 55114 United States	Electronic Service		No	20-800Official
54	Carol A.	Overland	overland@legalelectric.org	Legalelectric - Overland Law Office		1110 West Avenue Red Wing MN, 55066 United States	Electronic Service		No	20-800Official
55	Greg	Palmer	gpalmer@greatermngas.com	Greater Minnesota Gas, Inc.		1900 Cardinal Ln PO Box 798 Faribault MN, 55021 United States	Electronic Service		No	20-800Official
56	Jennifer	Peterson	jjpeterson@mnpower.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	20-800Official
57	Kristen	Peterson	kristenp@ips-solar.com	New Energy Equity		2670 Patton Road Roseville MN, 55113 United States	Electronic Service		No	20-800Official
58	Gordon	Pietsch	gpietsch@greenergy.com	Great River Energy		12300 Elm Creek Blvd. Maple Grove MN, 55369-4718 United States	Electronic Service		No	20-800Official
59	Phyllis	Reha	phyllisreha@gmail.com			3656 Woodland Trail Eagan MN, 55123 United States	Electronic Service		No	20-800Official
60	Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	1400 BRM Tower 445 Minnesota St St. Paul MN, 55101-2131 United States	Electronic Service		Yes	20-800Official
61	Kevin	Reuther	kreuther@mncenter.org	MN Center for Environmental Advocacy		26 E Exchange St, Ste 206 St. Paul MN, 55101-1667 United States	Electronic Service		No	20-800Official
62	Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates		7400 Lyndale Ave S Ste 190 Richfield MN, 55423 United States	Electronic Service		No	20-800Official
63	Bria	Shea	bria.e.shea@xcelenergy.com	Xcel Energy		414 Nicollet Mall Minneapolis	Electronic Service		No	20-800Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						MN, 55401 United States				
64	Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.		76 W Kellogg Blvd St. Paul MN, 55102 United States	Electronic Service		No	20-800Official
65	Peggy	Sorum	peggy.sorum@centerpointenergy.com	CenterPoint Energy		505 Nicollet Mall Minneapolis MN, 55402 United States	Electronic Service		No	20-800Official
66	Sky	Stanfield	stanfield@smwlaw.com	Shute, Mihaly & Weinberger		396 Hayes Street San Francisco CA, 94102 United States	Electronic Service		No	20-800Official
67	Byron E.	Starns	byron.starns@stinson.com	STINSON LLP		50 S 6th St Ste 2600 Minneapolis MN, 55402 United States	Electronic Service		No	20-800Official
68	Richard	Stasik	richard.stasik@wecenergygroup.com	Minnesota Energy Resources Corporation (HOLDING)		231 West Michigan St - P321 Milwaukee WI, 53203 United States	Electronic Service		No	20-800Official
69	Kristin	Stastny	kstastny@taftlaw.com	Taft Stettinius & Hollister LLP		2200 IDS Center 80 South 8th Street Minneapolis MN, 55402 United States	Electronic Service		No	20-800Official
70	Cary	Stephenson	cstephenson@otpc.com	Otter Tail Power Company		215 South Cascade Street Fergus Falls MN, 56537 United States	Electronic Service		No	20-800Official
71	Jason	Topp	jason.topp@lumen.com	Qwest Communications Company, LLC.		200 S 5th St Ste 2200 Minneapolis MN, 55402 United States	Electronic Service		No	20-800Official
72	Jenna	Warmuth	jwarmuth@mnpower.com	Minnesota Power		30 W Superior St Duluth MN, 55802-2093 United States	Electronic Service		No	20-800Official
73	Sarah	Whebbe	swhebbe@mnseia.org	MnSEIA		445 Minnesota Street Suite 730 St. Paul MN, 55101 United States	Electronic Service		No	20-800Official
74	Patricia	Whitney	patricia@pwhitneylaw.com	St. Paul Assn of Responsible Landlords		627 Snelling Avenue South St. Paul MN, 55116 United States	Electronic Service		No	20-800Official
75	Joseph	Windler	jwindler@winthrop.com	Winthrop & Weinstine		225 South Sixth Street, Suite 3500 Minneapolis MN, 55402 United States	Electronic Service		No	20-800Official
76	Robyn	Woeste	robynwoeste@alliantenergy.com	Interstate Power and Light Company		200 First St SE Cedar Rapids	Electronic Service		No	20-800Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						IA, 52401 United States				
77	Yochi	Zakai	yzakai@smwlaw.com	SHUTE, MIHALY & WEINBERGER LLP		396 Hayes Street San Francisco CA, 94102 United States	Electronic Service		No	20- 800Official
78	Curtis	Zaun	czaun@mnseia.org	MnSEIA		PO Box 8141 Saint Paul MN, 55108 United States	Electronic Service		No	20- 800Official
79	Kurt	Zimmerman	kwz@ibew160.org	Local Union #160, IBEW		2909 Anthony Ln St Anthony Village MN, 55418-3238 United States	Electronic Service		No	20- 800Official
80	Patrick	Zomer	pzomer@cozen.com	Cozen O'Connor		150 S. 5th Street, #1200 Minneapolis MN, 55402 United States	Electronic Service		No	20- 800Official