



414 Nicollet Mall
Minneapolis, MN 55401

February 3, 2026

—Via Electronic Filing—

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

RE: REPLY COMMENTS – TRANSPORTATION ELECTRIFICATION PLAN
2025 INTEGRATED DISTRIBUTION PLAN
DOCKET NO. E002/M-25-142

Dear Ms. Bergman:

Northern States Power Company, doing business as Xcel Energy, submits the enclosed Reply Comments in response to the Minnesota Public Utilities Commission's November 13, 2025 Notice of Comment Period issued in the above-referenced docket. Our Reply Comments respond to topics raised by parties in their January 13, 2026 Initial Comments regarding our 2025 Transportation Electrification Plan.

We have electronically filed this document with the Minnesota Public Utilities Commission, and copies have been served on the parties on the attached service list. Please contact Brandon Kirschner at 612-215-5361 or Brandon.M.Kirschner@xcelenergy.com or contact me at Holly.R.Hinman@xcelenergy.com if you have any questions regarding this filing.

Sincerely,

/s/

HOLLY HINMAN
DIRECTOR, REGULATORY & STRATEGIC ANALYSIS

Enclosures
cc: Service List

STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION

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

IN THE MATTER OF XCEL ENERGY'S
2025 INTEGRATED DISTRIBUTION PLAN

DOCKET NO. E002/M-25-142

**REPLY COMMENTS –
TRANSPORTATION ELECTRIFICATION PLAN**

INTRODUCTION

Northern States Power Company, doing business as Xcel Energy (Company), submits these Reply Comments in response to the Minnesota Public Utilities Commission's (Commission) November 13, 2025 Notice of Comment Period issued in the above-referenced docket. Our Reply Comments respond to topics raised by parties in their January 13, 2026 Initial Comments regarding our 2025 Transportation Electrification Plan (TEP).

We appreciate the thoughtful initial comments from parties. The parties provided many comments that included requests for additional information and recommendations about the programs discussed in our initial filing. To efficiently address their comments, our Reply Comments are organized by theme, with sections dedicated to the projects discussed in our TEP, with additional sections set up to discuss themes, such as equity considerations, that affect all projects.

Our Reply Comments are organized into eight sections as follows:

- Equity Considerations;
- Commercial Electric Vehicle (EV) Infrastructure Rebate and Advisory Program;
- Charging Perks Active Managed Charging Program;
- Residential EV Accelerate at Home (EVAAH) Program Modifications;
- Residential Advisory Services and Guided Charging Installation Programs;
- Proposed Tariff Modifications;
- Electric School Bus Vehicle-to-Grid (V2G) Charging; and

- New Rate Designs, Pilots, and Programs.

REPLY COMMENTS

I. EQUITY CONSIDERATIONS

A. Efforts to Remove Residential Program Design and Implementation Barriers

The Company provides the following information in response to the Minnesota Department of Commerce's (Department) request that the Company:

...identify the specific program design and implementation barriers that have limited enrollment among renters and residents of the identified communities, with particular attention to landlord approval requirements, split incentive issues, and gaps in program awareness.¹

The Company's residential offerings, as described in the TEP, include EVAAH and the EV Charger and Wiring Rebate. Importantly, these programs are aimed at reducing barriers to home charging installation, and the Company has seen participation in these programs meet or exceed forecasted participation, indicating that those efforts are working. The design and implementation barriers the Company's offerings address include:

- meter requirements,
- vehicle requirements,
- cost,
- customer awareness, and
- complicated contractual issues.

For example, existing residential programs require a dedicated meter for participation due to billing and managed charging requirements, meaning they often are not able to serve the needs of multi-dwelling unit (MDU) residents. Some programs are also limited in terms of which brand of vehicle may participate. For residential programs, cost is often a barrier. The Company's programs offer financial incentives that appear to be sufficient to drive participation and allow customers to install charging in their homes. Lack of awareness around customer technical needs and program availability is the primary barrier to participation above and beyond current levels.

¹ See Page 8 of Department's January 13, 2026 Comments

For MDU residents, the EV supply infrastructure (EVSI) pilot provided a turnkey solution that allowed for the installation of 360 charging ports at MDU residences throughout the program life however, the program design presented some barriers to participation and ultimately limited the pilot's reach. With the Company owning and operating equipment on an MDU premise, complicated contracting was needed between the Company and the building owner to delineate billing and maintenance responsibilities between the Company, property owner and the residents using the charging equipment. This contracting process proved to be a significant barrier to pilot participation and project completion. Site design and program requirements associated with Company-owned equipment of assets often led to space constraints making installation infeasible, a common problem for MDU residences with condensed parking footprints. The program also led to billing complexities that made it difficult to accurately administer customer bills and navigate billing responsibilities between property owners and residents.

1. *Strategies to Address Barriers*

The Company provides the following information in response to the Department's request that the Company:

...propose concrete strategies to address these barriers, including measures to streamline property owner approvals and detailed community engagement plans tailored to historically under-served areas to increase enrollment and sustained participation.²

The program proposals put forward in the TEP filing are designed to directly address the barriers identified above.

For residential programs, the Company has proposed to make the EV Charger and Wiring Rebate more accessible while maintaining its focus on managed charging by expanding its eligibility criteria to include customers on a time of use (TOU) rate. This expands access by allowing all customers to receive a rebate regardless of the type of vehicle or charger they use since not all original equipment manufacturers (OEMs) are compatible with the Company's managed charging portfolio.

The Company's rebates help customers manage the costs associated with EV charging installation. To further alleviate participation barriers to underserved customers and communities, higher rebates are available through both our residential and commercial rebate offerings. While the standard EV Charger and Wiring Rebate is \$500, income qualified customers are eligible to receive up to \$1,200. Commercial

² See Page 8 of Department's January 13, 2026 Comments.

customers located in an Environmental Justice (EJ) Area as defined by Minnesota Pollution Control Agency will be eligible to receive higher rebates for EVSI and EV service equipment (EVSE) installations. Through these elevated incentives, the Company hopes to reduce barriers to EV charging installations in underserved areas.

In terms of customer awareness, through the Energy Conservation and Optimization (ECO) modifications the Company has proposed its Guided Advisory Program in ECO to provide customers with a better understanding of their charging needs and raise awareness of financial incentives or tools available to assist in home charging installations if needed. The Company also participates in several community outreach plans that engage underserved areas by engaging in community activities and events to spread awareness about available programs. The Company has supported large events such as the Minnesota State Fair and the Twin Cities Auto Show, as well as smaller engagements, like the Coon Rapids Farmer's Market. Participating in these events have reached thousands of customers throughout the state. The Company has also worked with organizations like HOURCAR, The American Lunch Association, and the Clean Cities Coalition to reach more customers and spread awareness.

For MDU residents, by rebating charger installations at MDU properties rather than attempting to own and operate equipment, a broader range of solutions are available to customers installing charging equipment. In addition, the new design means that no contracting is necessary beyond the site host agreeing to the program terms and conditions, eliminating protracted and complicated contract negotiations that made project completion difficult under the previous program. In addition, a rebate program allows for site hosts and developers to design charging sites that align with the space available and the needs of their residents without having to accommodate additional equipment and design standards required by utility ownership and operation.

Lastly, the rebate model allows for a broader range of contracting, ownership and billing arrangements between developers or charging operators, property owners and residents. As stated in the TEP, MDU properties and their potential charging needs differ significantly from site to site. Some properties are well suited for dedicated charging and billing while others are not due to parking and metering configurations. The program design changes proposed alleviate issues around split-incentives by allowing for flexible solutions that can be supported by a rebate. Residents and property owners can collaborate to define a solution that works for them with the rebate program able to support any billing, ownership and maintenance arrangement defined by the applicant.

Additionally, some property owners choose to own and operate charging equipment

themselves while other sites have residents take on maintenance and billing responsibilities. Most commonly, a third party, often referred to as a Charging as a Service provider, owns and operates the charging equipment on behalf of the property while billing either the property owner or residents an agreed upon amount. Given this wide variety of solution types, a simple, flexible funding mechanism is necessary to meet customer needs and sufficiently reduce financial barriers to installation.

The rebate program as proposed offers simple, per-port incentives for EVSI and EVSE for MDU sites paired with simplified participation requirements for applicants and developers, providing certainty around funding amounts available to their project. By making the rebates assignable to third parties, with the signed approval of the applicant, the rebate program can accommodate the multitude of ownership and contractual arrangements necessary to meet the needs of the MDU market.

B. Evaluation of EV Accelerate at Home and Optimize Your Charge Financial Barriers

The Company provides the following information about our EVAAH and Optimize Your Charge (OYC) residential EV programs in response to the Department's request that the Company:

...evaluate how the current program structure addresses financial barriers to entry, particularly regarding upfront installation outlays and credit qualification processes.³

As detailed in the TEP, our EVAAH and the EV Charger and Wiring Rebate programs are designed to lower financial barriers to L2 charging equipment installations for residential customers. EVAAH provides installation services to customers at no upfront cost and offers a rental option for EVSE that also helps customers overcome the upfront cost barrier. Customers that participate in EVAAH are also able to obtain rebates that instantly offset the cost of the charger and/or wiring with their electrician on their invoices. Customers do not need to enroll in EVAAH to qualify for a rebate but will receive their rebate after work is completed and the invoice is submitted to the Company.

OYC is not intended to alleviate upfront financial barriers to electrification. The program is designed to alleviate grid constraints created by EV adoption by providing financial incentives to customers actively participating in the program. Ongoing incentives for participation can help alleviate ongoing costs of fueling a customer's

³ See Page 8 of Department's January 13, 2026 Comments.

EV. Customers that enroll in OYC may also be eligible for the EV Charger and Wiring Rebate to offset the costs of purchasing a Level 2 Charger or premise wiring for installing a 240v circuit.

EVs are often cost prohibitive for low-income customers, resulting in lower likelihood of participation from these groups. Additionally, as the Department pointed out in their comments, participation in areas of high poverty is much higher in the Company's Commercial offerings like the Public Charging and MDU Pilots. If EV drivers can access adequate EV charging outside the home, they may not need to install an EV charger in their home. Studies show that many consumers, particularly renters and those living in MDUs, are able to drive an EV without home charging by relying instead on workplace or public charging options. For example, a study conducted by Plug In America shows that 74 percent of single-family renters and 67 percent of renters in an MDU responded that they can successfully drive an EV without home charging access.⁴ As described elsewhere in these comments, the Company's proposed program designs are intended to increase commercial charging availability in underserved areas.

To further improve access and reduce cost barriers, the Company's partnership with HOURCAR helps to bridge the mobility gap for individuals who do not own a vehicle at all. The primary users of HOURCAR tend to be students and residents in dense urban areas who rely on shared vehicles for essential trips. In 2024, 44 percent of total utilization of Evie came from low-income users, demonstrating strong uptake among households with the greatest transportation needs.

Survey data also shows that HOURCAR meaningfully impacts and reduces the need for personal vehicle ownership and investment. 77 percent of respondents reported that access to HOURCAR allowed them to delay or avoid purchasing a vehicle. Trip-purpose reasons highlight the essential nature of this service, including:

- Grocery and essential shopping – 74 percent
- Social – 61 percent
- Medical – 51 percent
- Work – 40 percent
- Travel – 40 percent

⁴ Plug in America, *The Home Charging Experience* (January 2024), <https://pluginamerica.org/wp-content/uploads/2024/01/2023.12-Q4-Quarterly-Survey-Home-Charging.pdf>.

II. COMMERCIAL EV INFRASTRUCTURE REBATE AND ADVISORY PROGRAM

While we discussed the Commercial EV Infrastructure Rebate and Advisory Program in our 2025 TEP, we signaled that we planned to include this project as a part of our ECO program. We have moved forward with that plan and submitted our modification request to add this project, and our Residential Advisory Services and Guided Charging Program, to the ECO program on January 16, 2026.⁵ The Department concluded that the programs we have proposed to include in the ECO program are not subject to a Commission decision in our TEP filing and that they will provide a more fulsome review within the ECO modification docket.⁶

While the Company plans to replace our existing Commercial EV Charging Pilots with this Commercial EV Infrastructure Rebate and Advisory Program, we do not plan to close those pilots until all projects that are in process are completed. The Department has recommended denying our request to close the Commercial EV Charging Pilots to new customers, pending its review of and decisions on its replacement program in ECO.⁷ We do not believe that opening the pilots to new projects is the best path forward at this time given the pending request to close them and replace them with the rebate proposal. This would lengthen implementation and increase ongoing maintenance responsibilities and costs associated with the pilots. However, we are in alignment with the Department that the pilot should not close until they have decided on our ECO modification request. We reiterate our request that the Commission approve our proposal to close the pilots in this proceeding contingent on the Department's approval of our rebate program in the ECO modification docket and our completion of remaining pilot projects. We can commit to filing tariff modifications to close the pilots to new enrollees at the time all the contingencies are met.⁸ All contracts executed as part of the pilots will remain in place and participants will continue to be billed according to the existing tariff sheets.

A. Rebate Auditing and Compliance Procedures

The Company provides the following information in response to the Department's request that the Company provide information about the:

⁵ 2024-2026 Minnesota Electric and Natural Gas Energy Conservation and Optimization Program, Docket No. E,G002/CIP-23-92, MODIFICATION REQUEST (January 16, 2026).

⁶ See Pages 17 and 20 of the Department's January 13, 2026 Comments.

⁷ See Page 34 of the Department's January 13, 2026 Comments.

⁸ Please note that while we have proposed to close the pilots to new enrollees, the tariffs will remain available to participants as the contracts used for the pilots are for a ten-year term.

...specific auditing procedures, contract standards, and technical assistance measures it will implement to ensure rebate pass-through compliance for end-users and to facilitate program participation by small, rural, and community-based contractors.

The Company has instituted several processes in implementing similar rebate programs in other jurisdictions to ensure that applicants get the technical support they need and that they are the ones ultimately benefiting from the rebates which we plan to implement here as well. Each project begins with an application where payee information and customer and payee signature are required. Often an advisory meeting is held that aligns the installing contractor and customer on requirements. Applications are scored using factors such as geography, electric load, project type, and cost intended to promote equitable funding, including enhanced incentives for environmental justice areas. Clear invoicing standards require contractors to show rebate amounts deducted directly from customer charges. All projects must submit close-out documentation—including photos of installed equipment, final site plans, and electrical drawings—to verify completion. Large installations receive an on-site audit after construction to confirm accuracy and compliance. Throughout the process, our EV Concierge and Program Management Team provide ongoing program communications that support vendors and customers with technical, program, and billing guidance.

B. Program Terms and Conditions

In response to the Clean Energy Group’s (CEGs) request that the Company provides program terms and conditions for the Commercial EV Infrastructure Rebate and Advisory Program⁹, the Company provides, as Attachment A, a copy of the Program Terms and Conditions draft that the Company plans to use for the program, if the Program is approved. Please note that the draft Terms and Conditions reflects the program as currently designed and may require modification if changes are made to the Program. Additional edits may take place between now and program launch based on the outcome of launch activities and final development of enrollment processes.

The Terms and Condition draft provides relevant details and responsibilities for both the Company and participating customers. Metro Transit requested specific clarification of several program requirements that are reflected in the Terms and Conditions.

First, Metro Transit requested clarification of the requirement that installed EVSI must serve energized and operational EVSE to qualify for rebates, and the potential

⁹ See Page 9 of CEG’s January 13, 2026 Comments.

for penalties related to equipment reliability. To receive a rebate for EVSI, the installed assets must serve a dedicated energized charging port. This requirement is necessary to align the program with ECO Act cost effectiveness requirements that all measures must demonstrate benefits. EVSI installed without a charging port would not generate utilization or revenues at installation and therefore would not pass a cost-benefit test. Customers who receive rebates will not be penalized if equipment installed is down due to maintenance and reliability issues. There are no specific up-time requirements for installed equipment.

Further, Metro Transit also asked for clarification if there are any expectations for EVSE installed through the rebate program. The terms and conditions of the program do not include a specific expectation for EVSE installed. The Company assumes a ten-year life for equipment as a part of our ECO filing. Program participants will be responsible for procuring equipment and will be responsible for equipment ownership and maintenance.

C. Rebate Availability for Carshare Providers

Both the CEGs and City of Edina requested that the Company clarify the nature of support that will be given to HOURCAR, Evie Carshare, and other carshare providers under the rebate program. Carshare providers will be able to receive advisory services and financial support for charging installations. Financial support through the rebate program will be similar to the support provided in the past to these organizations through our EVSI pilots. While the Company will not be providing full design and engineering services as it does through its pilot offerings, the program will engage with third party installers to offer a turnkey solution like what's provided today.

Car share providers will be able to apply for an EVSI rebate for charging equipment they plan to install and operate. As stated in the TEP and elsewhere in these reply comments, the rebate model will allow for simpler contracting and procurement processes, thus allowing projects to be completed more cost effectively and efficiently. The Company engaged with HOURCAR and other stakeholders throughout the development of the TEP to ensure that the filing provides adequate support for carsharing needs in our community. Any rebates paid towards charging installations to support these providers would be in addition to the \$500,000 of annual funding for HOURCAR that is anticipated as a part of the Outreach, Events, and Sponsorships budget shown in our initial TEP filing.

D. Proposed Rebate Amounts

Multiple parties requested clarifications on rebate amounts or have requested changes to be made to the proposed rebate structure. The Coalition for Clean Transportation and Holly Swiglo requested the Company identify rebate amounts for school bus operators installing bidirectional charging stations.¹⁰ Metro Transit requested that rebate amounts scale with the size of the fleet and location to be considered.¹¹ In addition, Electrify America proposed higher rebate amounts for commercial charging installations alongside tiered public fast charging rebates based on the charging output of a given port.¹²

School bus operators will be eligible for both EVSI and EVSE rebates proposed in Tables 1 and 2 below.¹³

Table 1
Commercial EVSI Rebates

Charging Type	Standard (\$/Port)	EJ (\$/Port)
Level 2	\$6,500	\$10,000
DCFC	\$13,000	\$20,000

Table 2
Commercial EVSE Rebates

Charging Type	Standard (\$/Port)	EJ (\$/Port)
Multifamily Level 2	\$1,200	\$1,800
Public DCFC	\$25,000	\$35,000
Charging Type	Standard (\$/Port)	Bidirectional (\$/Port)
School Bus DCFC	\$20,000	\$40,000

EVSI and EVSE rebates are stackable, meaning a single installed port that meets program qualifications would receive both the EVSI and EVSE rebate. Under the rebate structures proposed, a school bus operator installing a bi-directional charging station would be eligible to receive a \$13,000 or \$20,000 EVSI rebate depending on whether they are in an EJ Area as well as a \$40,000 rebate to cover the cost of the bidirectional charging station. This means that they would be eligible for up to \$53,000 per bi-directional port installed or \$60,000 if they are in EJ Areas.

¹⁰ See Page 2 of their January 13, 2026 Comments.

¹¹ See Page 4 of Metro Transit's January 13, 2026 Comments.

¹² See Page 4 of Electrify America's January 13, 2026 Comments.

¹³ Tables 1 and 2 were also included in our initial 2025 TEP filing, as Tables 13 and 14 on Page 55.

With regards to the requested rebate increases and tiering proposed by Metro Transit and Electrify America, the Company supports the intentions behind these requests, however, we recommend maintaining the existing rebate amounts and tiers due to implementation and cost-effectiveness considerations. Based on learnings from the commercial pilots, the program is designed for simplicity and streamlined implementation. Previous EVSI pilots experienced implementation challenges due to overly complex program eligibility, contracting and design requirements. Leveraging these learnings, the Company's proposed design allows for more efficient application reviews and minimizes potential for project delays.

Added complexity, in the form of additional rebate tiers and eligibility requirements, creates the need for additional verification activities with the potential to slow down processing for projects that are often time sensitive. Regarding Electrify America's proposal to tier public fast charging rebates based on charging output of a given port, the Company offers a similar rebate in its Colorado service territory and has found implementation difficult. With power sharing and other similar technologies frequently leveraged by fast charging installations, the power available at a given port is not always clearly defined. This has led to customer confusion and application delays. The program as proposed alleviates these issues thus reducing review times, applicant documentation requests and increasing cost certainty for developers and applicants.

While the Company understands parties' interest in higher rebate amounts and the desire to maximize EV charging installations, the rebate program is structured to deliver a meaningful opportunity to increase charging installations while meeting ECO cost-effectiveness requirements. Increases to the proposed rebate amounts could jeopardize cost-effectiveness under ECO and the Company does not support increases at this time.

E. Status of ECO Modification Filing and Cost Recovery Request

The Company submitted our proposal for an ECO modification, which included both the Commercial EV Infrastructure Rebate and Advisory Program and the Residential Advisory Services and Guided Charging Program, on January 16, 2026.¹⁴ The Company is proposing to recover the cost of both the rebate program and our residential advisory services through the Conservation Improvement Program (CIP) Adjustment Rider.¹⁵ If approved as a modification to our ECO program, the costs of the projects would be included in our CIP Tracker Account for the applicable year.

¹⁴ See our January 16, 2026 Modification Request in Docket No. E,G002/CIP-23-92

¹⁵ See Section No. 5, Sheet No. 92.1 of our Minnesota Electric Rate Book.

Each year we file a request to adjust the CIP Adjustment Factor to recover the costs for the previous year.¹⁶

F. Inclusion of Transit Bus Operators

Metro Transit and the City of Minneapolis recommend expanding eligibility of the School Bus direct current fast charging (DCFC) EVSE rebates to transit buses. Given the similar electrification barriers faced by transit and school buses, the Company agrees with this recommendation and supports revising the eligibility criteria to include transit buses as a part of our current ECO modification request discussed previously. We can discuss this change as a part our Reply Comments in that docket.

G. Eligibility Criteria for Enhanced Rebate Amounts

Multiple parties requested changes to rebate eligibility criteria or amounts with a specific focus on increasing funding and access to EV charging serving low-income customers, multifamily customers and transit agencies. The Company agrees with these sentiments, however, we believe that the program as currently proposed is structured to achieve these goals in a way that will allow it to operate efficiently and cost-effectively.

CEG's and other parties recommend tiered incentive structures that offer higher rebate amounts for DCFC stations installed in rural areas, multifamily buildings defined as income qualified, installations by public entities or at women or BIPOC-owned sites among other criteria. While the Company agrees with these goals of increasing charging availability to underserved customers and communities, we believe that the current program structure will achieve the CEG's goals without adding additional complexity with seemingly little benefit. As outlined previously, an objective of the new program design is to simplify program requirements and streamline application review processes to overcome administrative challenges and project delays experienced by the EVSI pilots. The addition of rebate eligibility criteria would result in additional documentation requests as well as new review and verification processes. The Company has experience implementing similar criteria for commercial rebate programs in other jurisdictions and has experienced implementation challenges and customer confusion. Many of the criteria requested would require customers to submit tax documents or other sensitive documentation that customers have at times been hesitant to share for similar programs. Clear, simple to understand criteria make for more streamlined application reviews and cost

¹⁶ Our most recent CIP Adjustment Factor modification request was filed on April 1, 2025 as a part of our 2024 Energy Conservation and Optimization Filing in Docket No. E002/M-25-50.

certainty from applicants which will allow for more efficient program implementation and ultimately projects coming online sooner.

The Company believes that the program as proposed is the most effective way to achieve the parties' goals of expanding charging access to underserved communities. Commercial charging installations are unique from residential installations or equipment installed through other similar rebate programs, such as energy efficiency, in that they are intended to benefit EV drivers in the surrounding community rather than exclusively benefiting the site host. Members of the surrounding community will realize these benefits through increased access to EV charging and reduced air pollution that results from additional EV's in their area. For this reason, the Company believes that a geographic interpretation of underserved communities is the most effective way to meet program and intervenor goals.

In response to parties' requests to include buffer zones or introduce exceptions to EJ criteria, the Company believes that this will create confusion during the application process and may lead to applicants misunderstanding rebate eligibility. Clearly defined, easy to understand delineation between sites that are eligible for enhanced rebates is necessary to provide certainty to developers and applicants when designing a project and preparing a rebate application. Cost certainty is critical when developing a project and equipment procurement plan. Increasing the ambiguity of eligibility criteria increases the likelihood of a misunderstanding of costs between developers and site hosts during the application phase. Implementation and program efficiency concerns expressed in the previous paragraph apply to these requests as well. Clear rebate criteria are essential to minimize confusion for both customers and program staff and ensure efficient and accurate program reviews and ultimately overcome administrative issues experienced by previous TEP programs.

H. Rebates for Level 1 Charging Installations

The Company provides the following information in response to the CEG's recommendation that the Company develop a rebate tier for customers interested in working with an electrician to install Level 1 EVSE.¹⁷

The Company supports Level 1 charging and will work to educate customers on the benefits and use cases of Level 1 charging wherever possible. A significant benefit of Level 1 charging is that it requires no installation of dedicated electrical circuits or EVSI for charging and instead can normally rely on using standard 120v or 240v outlets to plug-in the standard charging cables that come with many EV models at the

¹⁷ See Page 11 of the CEG's January 13, 2026 Comments.

time of purchase. Given Level 1 charging's simpler and less expensive installation profile, the Company does not see a financial barrier to utilizing Level 1 charging that would necessitate a rebate.

I. Rebate Enrollment Process

Multiple parties have requested changes to the proposed rebate enrollment process. In particular, the City of Edina requested that customers that have previously engaged in advisory services with the Company receive priority in their rebate applications, and EVGo requested that applicants be allowed to begin project construction "at risk" or prior to receiving reservation of funding.¹⁸

The Company clarifies that its program design will not take prior customer engagement into consideration in the application review process. The initial intake process involves a customer submitting an intake form with broad project outlines which the program team reviews and sets up an initial advisory call with the applicant if requested to discuss the planned project and answer any questions an applicant may have. This process is like the intake process in place under previous TEP pilots. After this initial review, applicants will be sent a link to a formal application that they can fill out with full project details. Customers that have previously gone through project intake processes with the Company will have relevant project information that will make application submissions easier to execute.

In response to EVGo's request to allow applicants to begin construction prior to receiving funding reservations, the Company has no issue allowing for this if it complies with ECO portfolio requirements. The Company encourages further discussion on this in the ECO modification request filed on January 16, 2026 in Docket No. E,G002/CIP-23-92. If this were to be approved, the Company would recommend defined criteria around how far in advance of an application procurement and construction would take place as well as the type of work that is eligible begin prior to funding being reserved.

J. Program Budget

Multiple parties have requested that the proposed program budgets be increased and that specific funding carveouts be made for public fast charging specifically. The Company proposed the budget that we believe will support the Commercial EV charging market while also meeting the ECO requirements. The Company encourages

¹⁸ See Page 2 of the City of Edina's Comments and Page 4 of EVgo's Comments, both filed on January 13, 2026.

parties who are interested in modifying the rebate program budget to file comments in our ECO modification request proceeding in Docket No. E,G002/CIP-23-92.

The Company does not support any specific carveouts for charging types in the budget, as we believe that the program best serves customers by not constraining the ability to respond to market demand. We will also note that program cost effectiveness requirements of ECO programs may influence the types of projects that are approved and funded.

III. CHARGING PERKS ACTIVE MANAGED CHARGING PROGRAMS

A. Analysis of Optimal Program Incentives

The Department has requested the Company provide analysis showing the projected enrollment trends of Standard and Distribution Optimized Customers, specifically on projected enrollment trends in EJ Areas and census tracts with high poverty rates, communities of color and rural areas. The Department also requested that the Company review the proposed incentive levels and identify the optimal incentive level needed to achieve participation rates necessary to defer distribution upgrades.

The analysis requested by the Department is necessary for implementation, and we are currently establishing methodologies and processes for determining these needs on the system and are committed to sharing the results when they are completed as soon as they are available.¹⁹

As a general matter, however, we note that the program is designed to alleviate grid constraints at both the bulk system and the distribution system. Distribution Optimized customers are customers that the Company has determined to be served by an overloaded distribution asset, in this case a feeder, and therefore able to help defer asset maintenance in addition to reducing bulk system peaks. This incentive distribution is intended to maximize cost effectiveness by aligning program costs with functionality that maximizes grid benefits. The intent of the program is to reduce system costs and ultimately increase affordability for all customers, not just program participants.

While the incentives provided by the program have the potential to reduce charging costs to participants and lower the cost of EV ownership, that is not the primary intention of the program or of managed charging offerings in general. Managed

¹⁹ The efforts required for this analysis were discussed in greater detail in our respond to OAG Information Request No. 3 in this docket.

charging programs are unique compared to the rest of our portfolio in that their primary intention is not to reduce barriers to electrification to participants but rather to alleviate grid constraints posed by mass EV adoption. Alleviating these constraints using managed charging has the potential to reduce system costs and utilize EV load to create downward pressure on rates for all customers, which in turn reduces costs of electrification.

The relative rebate amounts for a Distribution Optimized customer and a Standard Customer reflects the relative difference in grid value as shown in Attachment G included with the TEP filing. Our response to Minnesota Office of the Attorney General's (OAG) Information Request No. 2, included as Attachment B to our Reply Comments, outlines in detail why the amounts were chosen and why we believe that they provide a path to adequate participation and eventual program cost effectiveness. Program implementation experience along with further enhancements to system mapping and event dispatching systems will inform what participation levels would influence distribution investment.

For this reason, the Company is open to parties' suggestion that Charging Perks is operated as a pilot which is discussed in more detail later in these reply comments.

B. Addressing Operational Challenges of Managed Charging Program

The Company provides the following information about Charging Perks and our managed charging efforts in response to the Department's request that the Company:

...explain how it is working to address the administrative and operational challenges cited in its 2025 Annual EV Report including an approximate timeline of when the challenges will be fully addressed.²⁰

The Company is currently working to integrate managed charging vendor platforms with our Salesforce customer relationship management system to simplify customer enrollment and tracking. A competitive bid for managed charging software providers was completed in early 2025 with current vendor onboarding finalized shortly thereafter. From mid-2025 onward we have worked to integrate enrollment processes with our Salesforce and billing systems to streamline customer enrollments and reduce the amount of information necessary for customers to submit to complete enrollment. Integration between vendor platforms and Salesforce will also allow for direct line of sight to customer connectivity and enrollment status allowing for more

²⁰ See Page 24 of the Department's January 13, 2026 Comments.

efficient enrollment management and customer communication. Integration of Charging Perks vendor platforms and Salesforce is planned to be finalized in 2026.

Some of the primary challenges of OYC are the two-step enrollment for a customer. The customer who first enrolls through Xcel Energy's webpage then must connect to the managed charging vendor's platform to share data with Xcel Energy. These verification and enrollment tracking processes are currently done manually. To address this complexity, Charging Perks will be integrated with Salesforce, and the customer will apply for the program through the appropriate managed charging platform with instant customer verification and enrollment creation taking place in Salesforce. These verification and enrollment tracking processes are currently done manually. This integration will increase the efficiency and accuracy of these processes significantly. In addition to these integrations, the Charging Perks enrollment process as currently implemented contains fewer steps and provides a simpler customer experience than the current OYC enrollment flow which should further reduce customer confusion and implementation challenges once the managed charging portfolio is fully transitioned to Charging Perks.

In addition to Salesforce integrations, program vendors are continuing to increase reliance on vehicle OEM telematics rather than smart charging stations connected to WiFi. This increases the likelihood of customers remaining connected to their managed charging platform as it removes a common connection failure between a customer's smart charging station and their WiFi router.

C. Managed Charging Operations

The Company provides the following information in response to the Department's request that the Company:

...discuss the feasibility of incorporating daytime charging windows into its managed charging algorithms to leverage utility-scale solar generation and designing logic to shift load away from 'calm' (low-wind) nighttime periods.²¹

The Charging Perks program's current charging schedule algorithm incorporates daytime charging for participating customers. Charging Perks optimizes customer charging to occur during times of high renewable generation by leveraging a renewable forecast that is dispatched daily to the managed charging vendors. These forecasts account for daytime hours with high solar penetration. Should a customer's charging preferences allow for it, their personalized charging schedule may shift their

²¹ See Page 24 of the Department's January 13, 2026 Comments.

charging to daytime hours, when the EV signal has high forecasts for renewables. Customers can use the "charge now" functionality to charge their EV during the day and override other charging schedules. The charging schedule algorithm ensures that customers vehicles are charged by their pre-set departure time, so it will be dependent on when the customer plugs in the vehicle and the amount of time they give themselves to charge the vehicle, along with taking their rate class into consideration.

In addition, the Company provides the following information in response to the Department's request that the Company:

...discuss in greater detail how it intends to operate Charging Perks to meet participants' "ready-by" time and at what level of consistency.²²

The vendor scheduling algorithms prioritizes customer preferences to ensure that the car is ready when the customer needs it. This means that customer preferences override renewable optimized charging schedules to ensure that customer "ready-by" times are met. There are factors that may contribute to a customer's vehicle not having a full charge by their pre-set departure time, but these largely fall outside of scope of the program, such as changes in customer driving patterns or plug-in frequency, and are not impacted by participation. Customers can always override charging schedules to begin charging immediately, should they need additional charge. There is a 90 percent adherence to the charging schedule, with 10 percent of users overriding the charging schedule.

D. Charging Perks Tariff Sheets

The Department has requested that the Company provide draft tariff sheets for our proposed Charging Perks program.²³

Because active managed charging is a fairly new technology with a nascent market of vendors and software solutions, the Company does not believe it is efficient or necessary to develop a tariff sheet at this time, as it will prevent the Company from responding to and adjusting the program as necessary to meet customer needs and expectations. Program flexibility and agility should be prioritized to ensure that the Company can react to a developing market. Given this context, and as discussed in more detail below, the Company is supportive of operating Charging Perks as a pilot in the near term to assess true grid value and cost effectiveness prior to proposing a permanent tariff-based program.

²² See Page 29 of the Department's January 13, 2026 Comments.

²³ Ibid.

E. Transition Plan for Optimize Your Charge Participants

The Company provides the following information in response to the Department's request that the Company describe our communication strategy for participants in our OYC pilot who will not be eligible for Charging Perks due to limitations on vehicle models.²⁴

Upon approval, customers will be notified of program approval and the planned transition from OYC to Charging Perks. The Company plans for roughly a 6-month window between approval and program closure with regular outreach including emails and calls to customers informing them of the status of the transition and opportunity to opt out. Customers with eligible vehicles or chargers will be notified through email that the program will be closing, and they can opt-into the Charging Perks program. We will send a series of emails leading up to the OYC program closure to transition as many customers as possible. There are many overlapping eligible vehicles and ChargePoint charger enrollments that can transition to the Charging Perks program, along with additional vehicle and EVSEs that can enroll. Customers that have been enrolled in OYC with an ineligible Charging Perks vehicle, may be eligible to enroll with an eligible charger. The Company will contact all OYC customers with ineligible Charging Perks vehicles of the new program offering's expanded eligible vehicle and charger list along with encouraging customers to capitalize on the EV Charger and Wiring Rebate if they have not yet received a rebate. Customers that do not have an eligible charger or vehicle that wish to continue receiving benefits for charging off peak will be encouraged to enroll in the Company's TOU rate which will provide a higher financial benefit to customers than the current OYC bill credit as outlined in the TEP filing.

F. Potential Future Program Modifications to Address Costs and Limitations

The Company acknowledges that implementation costs currently exceed quantifiable program benefits and that more cost-effective solutions are necessary to realize the potential benefits of a managed charging program in the future. A competitive request for proposal (RFP) was completed in early 2025 that resulted in the execution of contracts with the program's current software providers. Given the nascent and somewhat volatile state of the market, the Company has determined that multiple vendors are necessary to provide sufficient market coverage and program functionality. We have executed two-year contracts with each vendor and plan to

²⁴ See Page 31 of the Department's January 13, 2026 Comments.

continue to conduct RFP's at regular intervals to ensure that we are maximizing program access and cost effectiveness for our customers.

To actively control customer vehicles, it is necessary to access the vehicle or smart charging station directly, often through an application programming interface or open communications protocol. Whether or not a charging station or vehicle is accessible via one of these pathways is ultimately determined by the vehicle or charger OEM. For this reason, the Company has limited control over how much of the market it can access with an active managed charging program. We have no control over whether an OEM chooses to make their equipment capable of active managed charging or what software platforms they choose to work with. As stated above, we will continue to execute competitive bids on a regular basis to maximize market access. The Company's expectation is that as the market for this product matures, vendor consolidation will take place with access becoming more uniform across providers and costs ultimately coming down. We will continue to monitor trends and make contracting decisions that are in the best interest of program cost effectiveness and our customers.

In response to requests to review alternative pathways for program improvement and managed charging methods less reliant on decisions made by market actors, the Company believes that the managed charging portfolio brought forward in this docket maximizes active managed charging opportunities while providing alternative options for more cost-effective and risk-averse charge management.

As described above, direct control of vehicles requires the vehicle or charger OEM to grant access to their equipment. Passive managed charging solutions offer the benefit of influencing customer charging behavior without the need to directly access vehicle or charging equipment. OYC is a passive managed charging program in that it attempts to influence customer behavior through price signals rather than direct control of a vehicle's charging; however, it requires vehicle or charger access for evaluation of customer behavior and administration of customer bill credits. The same is true for EVAAH TOU rates as the program's deductive billing requires data exchanges between the charging station and the Company. The new whole-home TOU rate becoming available this year to all NSPM customers is a truly passive solution available to all EV drivers charging at home regardless of the vehicle or charging equipment they use. TOU rates encourage the same behavior as OYC and at greater financial benefit to the customer as outlined in the TEP filing. This is the primary reason for transitioning away from OYC and expanding Charger and Home Wiring Rebate eligibility to customers that enroll in the new TOU rate. TOU rates provide price signals to customers to encourage them to charge away from bulk

system peaks without significant technology investment by them or the Company and without extensive enrollment requirements.

A passive solution such as TOU rates paired with a targeted active managed charging solution such as Charging Perks capable of being dispatched according to real-time grid needs is the long-term managed charging strategy best suited to meet grid and customer needs. The Company will continue to work to expand Charging Perks access and dispatching capabilities, improve program implementation through enrollment simplification and data management improvements while also educating customers to help them identify the solution best suited to their charging needs.

G. Assessment of Program Benefits

The Company provides the following information in response to the OAG's request that we explain how we developed the benefits estimates in our CBA analysis of the Charging Perks program and how those benefits will be realized.²⁵

In our response to OAG's Information Request No. 2, the Company provided a detailed explanation of how we determined the benefits, such as avoided system infrastructure costs, and how those benefits will be realized. We include a copy of that response as Attachment B.

H. Potential to Operate Program as a Pilot

The Company provides the following information in response to the OAG's request that the Company:

...explain whether the program could be proposed as a pilot either (1) to a limited number of participants or (2) to participants that would be considered Distribution Optimized.²⁶

The Company is not opposed to classifying Charging Perks as a pilot. As outlined in these reply comments, the Company agrees with parties that active managed charging is a new technology with many unanswered questions. Many of the questions posed and analyses requested by parties within this comment period require implementation and measurement to understand impacts of various program actions and potential improvements on customer sentiment, enrollment and the grid.

²⁵ See Page 2 of the OAG's January 13, 2026 Comments.

²⁶ Ibid.

Based on the needs for implementation and measurement, the Company does not oppose operating the program as a pilot and reassessing this designation in our next TEP. We do not believe that a participation limit or cost cap is necessary given the current levels of EV adoption and program accessibility.

I. Program Reporting Requirements

The Company appreciates the Department's recommended approval of the proposed reporting requirements as well as the recommendations for additional metrics to include in program reporting. In addition to the reporting requirements outlined in the original filing, the Department has requested that the Company report on how often customer "ready-by" times are met, customer satisfaction with the program, opt-out rates and customer reasons for opting out of charging schedules, vehicle and charging station makes and models eligible to participate in the program and reporting on data access fees incurred by customers from vehicle or charger OEM's.

The Company supports these additional reporting requirements, with the exception of reporting on customer "ready-by" times and data access fees. Reporting on how often a customer's "ready-by" time is achieved is unnecessary because, as described in these reply comments, customer preferences supersede any charging schedule implemented by the Company. In other words, a customer's preferred "ready-by" time should not be impacted by participation. With regards to data access fees, the Company does not have control over OEM's or charging providers that charge fees to customers for data access and are not always made aware of fees that are put into place. Since the program is implemented by software providers that work with a wide range of vehicle and charger OEM's, the Company does not directly interact with these OEM's and does not have direct line of sight to the products or services offered by providers and costs associated with these services.

OAG commented that the Company did not provide a roadmap for how the proposed reporting requirements would be used to improve program cost effectiveness in the future. The reporting requirements proposed in the original filing include a detailed breakout of program costs and benefits. The metrics proposed will allow for an extensive cost benefit analysis to be done on a regular basis to identify the primary sources of program costs and benefits and adjust implementation strategies accordingly. Paired with customer surveys and system planning data, these proposed reporting metrics will be used to allocate program resources, adjust Distribution Optimized customer criteria and alter scheduling and dispatching strategies in ways that maximize cost effectiveness.

IV. RESIDENTIAL EV ACCELERATE AT HOME PROGRAM MODIFICATIONS

The Company provides the following information in response to various requests addressing the changes in EVAAH monthly customer charges, including the Department's request to discuss the impact of Enel X ceasing residential charging operations and overall drivers in cost changes.²⁷

The Enel X shutdown increased the Company's cost to operate the EVAAH program. The updated Subscription Service pricing reflects increased kWh costs. In addition, electricians supporting the program revised their service rates, and those updated costs are incorporated into the revised pricing for both the Pay-as-You-Go option and the Voluntary Charger Service.²⁸

A. Inclusion of Level 1 Charging in Residential Charging Programs

The Company provides the following information in response to the CEG's request that we investigate expanding eligibility in our EVAAH program to allow for participation by customers using Level 1 charging.

We understand that there may be some residential customers who rely on Level 1 charging for their needs, but as noted by CEG's, only a small portion of overall EV drivers rely on Level 1 charging at home.²⁹ The EVAAH at home program was specifically designed to address the cost and infrastructure barriers that come with the installation Level 2 charging. Level 1 charging generally does not present the same equipment cost barriers as Level 2 charging for the same reasons discussed in Section II.H above. Beyond the limited barriers to entry of Level 1 charging, Level 1 charging also present technical limitations which would make integration into our EVAAH program impossible. Currently, Level 1 chargers do not provide smart charging and data transfer capabilities. The Company relies on those capabilities to measure charging usage to support deductive billing under the EVAAH program. The Company is not supportive of this recommendation at this time.

²⁷ See Page 14 of the Department's January 13, 2026 Comments.

²⁸ A comparison of costs and revenues for the EVAAH program can be found in Pages 9 and 10 of our most recent EV Annual Report, filed May 30, 2025 in Docket No. E002/M-15-111.

²⁹ Per the Plug in America study cited by the CEG's it is about 20 percent.

V. RESIDENTIAL ADVISORY SERVICES AND GUIDED CHARGING INSTALLATION PROGRAM

The Company provides the following information in response to the CEGs recommendation that the Company continue to provide vehicle information on our website.³⁰ We also provide information in response to the recommendations from the CEGs and Native Sun to develop outreach strategies with trusted community organizations.³¹

The Company will continue to maintain relevant EV information on its website related to program eligibility and enrollment in rebates and programs. In addition, the Company is exploring opportunities to collaborate with automotive industry experts to provide customers with pathways to access more comprehensive and in-depth EV information beyond core program details.

The Company values collaboration with Native Sun and other community-based organizations and is open to partnering on marketing, education, and outreach efforts that support EV charging. We welcome continued dialogue with community organizations to identify opportunities to jointly promote EV adoption, especially through charging education initiatives.

These activities are supported through the Company's ongoing Outreach and Events work and are grounded in shared objectives, including:

- Advancing income qualified and EJ Area goals while delivering meaningful, community-driven impacts
- Supporting workforce development opportunities within the EV ecosystem
- Expanding EV charging education and public awareness

VI. PROPOSED TARIFF MODIFICATIONS

The Company provides the following information in response to the Department's request that we discuss the benefits of extending the off-peak periods to allow for staggered EV charging and the CEG's recommendation that the Company be required to refile our tariff modifications with more modest increases in off-peak energy charging rates.³²

³⁰ See Page 13 of CEG's January 13, 2026 Comments.

³¹ See Page 14 of CEG's and Page 1 of Native Sun's January 13, 2026 Comments.

³² See Page 33 of the Department's and Page 19 of the CEG's January 13, 2026 Comments.

We have proposed keeping our EVAAH and MDU pilot pricing the same as the rate design approved for our Residential TOU Rate, which is consistent with how we have operated our Residential TOU Rate and EV tariffs in the past. The Department supported approving our proposed tariff modifications to match the rates of our EV tariffs with the approved Residential TOU rates and peak periods.³³

The Company does not support creating a new rate period structure and design with longer off-peak periods and modest rate modifications. We believe that creating different rate designs for different use cases would potentially be discriminatory to customers in the same rate class, as it would create two versions of costs depending on what the energy is being used for and would result in lower costs only for specific privileged energy usage. It would also likely create confusion for customers as they would have to understand the nuances of two different rate designs for the same residence. This would also create additional complexity for the Company as it attempts to incorporate customers who are on net metering tariffs into our residential EV offerings.

The Company is currently in the process of developing a new TOU rate proposal for our commercial and industrial customers. This proposal will be filed in March 2026. As a part of that proposal, we will complete a full analysis of the anticipated load curves and costs to deliver energy within our system in future years. Preliminary analysis as a part of that effort has shown that it is possible that a longer off-peak period would be reasonable in future years. The Company will discuss the results of our analysis in our March 2026 proposal. If it is determined that a longer off-peak period is reasonable, and stakeholders and the Commission are supportive of our rate structure proposal, then the Company would propose modifications to our Residential TOU Rate and EV tariffs to incorporate a new rate structure in a future rate proceeding to keep the rate structures similar across classes. Doing so would promote fairness and equity within the residential customer class and would be more reflective of our future system load and costs.

VII. ELECTRIC SCHOOL BUS V2G CHARGING

The Department requested that we provide further details on enrollment in our originally approved electric school bus V2G demonstration project and further information about what will be done with funds remaining from the approved budget for the demonstration project.³⁴

³³ See Page 33 of the Department's January 13, 2026 Comments.

³⁴ See Page 35 of the Department's January 13, 2026 Comments.

The Company has not received any enrollment in our electric school bus V2G demonstration project as originally approved. The Company worked with developers and approached school districts interested in bus electrification to discuss the V2G demonstration. As indicated in our Petition, these outreach efforts taught the Company that the program's design created significant barriers to signing on participants, and that less rigid solutions with a greater focus on education and alignment with developers would be necessary to provide viable options for our customers. The Company's modified project meets potential participants where they need support most: education and up-front costs.

The proposed Commercial EV Infrastructure Rebate and Advisory Program is meant to evolve the project as originally proposed and better align with the Company's learnings. The planned scope of the original project will be replaced with the rebate program discussed in this TEP. The funding originally requested as part of the TEP will no longer be included in base rates and will instead be requested as part of the rebate program proposed through our ECO filing.

VIII. NEW RATE DESIGNS, PILOTS, AND PROGRAMS

As part of their comments, parties suggested many new programs, pilots, and rate tariffs that the Company should pursue in future rate cases and TEPs. The Company appreciates the enthusiasm that parties have in pursuing new transportation electrification efforts. Transportation electrification is an ever-evolving market and as EV adoption increases and technology changes, the Company is continuing to monitor the evolving market and exploring options that can help our customers meet their EV charging needs and commercial charging providers build out greater public charging opportunities.

Through our EV offerings, the Company's goal is to encourage transportation electrification in a way that is cost effective and does not increase costs for non-EV drivers while meeting Commission guidance and supporting state. We will certainly pursue new efforts, including potentially some of the offerings proposed by parties in their comments, if they further these goals and can be implemented in a successful manner. We are happy to explore and discuss many programs suggested by parties, but we strongly encourage the Commission to not require us to propose any specific EV programs, pilots, or rate design that have not been studied to ensure they can feasibly be executed cost-effectively and successfully.

While we are open to exploring many of the suggestions from parties, we would like to specifically push back on a few that we do not believe would be feasible at this time. First, the CEGs recommend that the Company explore EV vehicle rebates. The

Company has previously proposed vehicle rebates and received significant pushback on that proposal from both stakeholders and customers, and the Commission ultimately rejected that proposal.³⁵ We believe our efforts to alleviate hurdles to installing EVSI and EVSE and making charging more affordable are better uses of utility funds than rebates would be.

Second, the CEGs asked the Company to explore the development of an active managed charging program for electric school buses, transit vehicles, and other commercial-scale fleets. While this may become feasible in the future, the Company is not currently aware of any vendors or aggregators that provide the service at this time. It would be difficult if not impossible for the Company to implement this soon from a technical aspect, but it is also unclear the value of additional active managed charging in our service territory. We have yet to implement any active managed charging, with Charging Perks being proposed for the first time in this TEP, in Minnesota and have not been able to study the benefits that active managed charging brings through avoided system costs. It is premature to explore additional managed charging before we can study it at a smaller residential scale.

CONCLUSION

We appreciate the opportunity to respond to parties' comments and appreciate their thorough review. We believe that our EV portfolio is delivering benefits to customers and further the adoption of EVs in our service territory and the proposals in our TEP will help us further those efforts. We respectfully request that the Commission accept our TEP and approve our proposals.

Dated: February 3, 2026

Northern States Power Company

³⁵ *In the Matter of Xcel Energy's Petition for Approval of Electric Vehicle Programs as part of its COVID-19 Pandemic Economic Recovery Investments*, E002/M-20-745, ORDER APPROVING PUBLIC CHARGING STATION PROPOSAL (April 27, 2022).

Xcel Energy Minnesota Commercial EV Infrastructure Rebate Program Terms and Conditions (“Program Terms”)

Rebate Program Definitions

The following defined terms will have the meanings set forth below:

“Bidirectional EVSE” is defined as EVSE that enables an Electric School Buses to both draw power from and supply power back to the electric grid or building.

“Company” means Northern States Power Minnesota (NSPM) doing business as Xcel Energy.

“Charging As A Service (CaaS) Provider” means a business model where electric vehicle (EV) charging infrastructure is provided to a Site Host by a CaaS Provider as a subscription-based or pay-per-use service, rather than requiring the customer to buy and maintain the charging hardware themselves. The CaaS owns and operates the equipment on behalf of the Site Host and would be the Qualifying Customer responsible for submitting a Program Application assuming they meet all requirements. Any CaaS Provider acting as the Qualifying Customer on behalf of a Site Host must provide a Letter of Intent (LOI) demonstrating the Site Host’s approval and cooperation with the Project submitted with the Program Application.

“Charging Port” means a connector that delivers power from an EVSE to an EV. A Project will be eligible for a Rebate based on the number of installed Charging Ports. The power output of the Charging Port is defined as the wattage it is capable of delivering to an EV through each port simultaneously.

"Civil Design and Construction" refers to all necessary work required to ensure the correct installation and use of an EV charger. This includes concrete work necessary for mounting a pad and site drainage, protective barriers (bollards and wheel stops), and site-specific lighting, striping, and painting. "Civil Design and Construction" does not include software subscriptions or repeaters for below-grade parking.

“Commission Date” means the date through which funds will be reserved for a Project as stated in the most recent Reservation Letter.

“Electric School Bus” is defined as a Class 4-8 (GVWR 14,001 pounds or higher) bus meeting the eligibility requirements set forth in Section 5.1 which is sold or introduced into interstate commerce for the primary purpose of transporting kindergarten through twelfth grade students to and from school or related events.

“Electric Vehicle Supply Equipment” or “EVSE” means the electric vehicle charging equipment installed at the Installation Address which is used to deliver electricity from the EVSI to an EV. EVSE includes the ungrounded, grounded, and equipment grounding conductors, the electric vehicle connectors, attachment plugs, and all other fittings, devices (including the charger), power outlets, or apparatuses associated with the installed device, but does not include EVSI.

“Electric Vehicle Supply Infrastructure” or “EVSI” means service panels, conduit, and wiring, from the electric service connection to the charger stub as well as any necessary Civil Design and Construction. EVSI does not include the line

extension necessary to connect Company's distribution system to the service connection and does not include the EVSE.

"Energy Star Certified" means EVSE that meets the Energy Star Certification requirements currently found at https://www.energystar.gov/products/ev_chargers.

"Environmental Justice Area" means a census tract that is defined as such by Minnesota Statue. Full definition and maps can be found [here](#).

"EV" means a battery electric vehicle ("BEV"), plug-in hybrid electric vehicle ("PHEV") or fuel cell vehicle.

"EV Advisor" means a Company employee responsible for communicating with Qualifying Customers, reviewing Program Applications and overseeing Rebate payments.

"EVSE Costs" means the Qualifying Customer's cost incurred after the signing of a Reservation Letter to purchase the EVSE and the cost of mounting the EVSE and connection to the EVSI at the Installation Address. EVSE Costs do not include any taxes or shipping costs associated with procurement or installation of the equipment. Any external funding received to cover a portion of EVSE Costs will be deducted from eligible EVSE Costs that may be covered by the Rebate, as determined by Company.

"EVSI Costs" means the total costs and expenditures incurred by the Qualifying Customer after signing a Reservation Letter, as documented on the EVSI Invoice received from the Vendor, to engage a Vendor for its services to design, procure, construct, and install the EVSI at the Installation Address. EVSI Costs do not include any taxes or shipping costs associated with equipment procurement or installation. Any external funding received to cover a portion of EVSI Costs will be deducted from eligible EVSI Costs that may be covered by the Rebate, as determined by Company.

"EVSI Invoice" means an invoice template that conforms with a template that has been pre-approved by Company and provided to the Qualifying Customer for use by a Vendor to clearly identify EVSI and EVSE Costs as defined in this document.

"Installation Address" means the address at which the EVSE and/or EVSI for which the Qualifying Customer receives a Rebate is installed and metered. To receive a Rebate, the Installation Address must be located in Company's electric service territory and take electric service from the Company.

"Letter of Intent (LOI)" means a signed letter signed by a Site Host and giving their approval for a third-party entity, often a CaaS Provider, to install EVSE and EVSI equipment on their property and pursue a Rebate as a Qualifying Customer. A third party pursuing a Rebate on behalf of the Site Host must meet the definition of a Qualifying Customer as defined in this document.

"Multifamily" is defined as a housing classification referring to a single building or complex containing multiple, separate residential units, such as apartments, condominiums, duplexes, or townhomes

"Payee" means the recipient of the Rebate. This can be either the Qualifying Customer or a third party that is providing EVSI and/or EVSE installation services. A Payee that is not the Qualifying Customer must be the entity invoicing the Customer for the rebated services in order to meet the requirements for Rebate assignment as defined in this document.

“Program Application” means a Microsoft Excel or digital application document that contains all required Project information.

“Project” means the Qualifying Customer’s project set forth in the Program Application, including the procurement, design and installation of EVSI and/or EVSE covered by the Program Application, that will be procured and installed by the Qualifying Customer at the Installation Address.

“Project Completion” means that the EVSE and EVSI equipment has been installed and commissioned according to the Project scope as defined in the Program Application and Reservation Letter, is energized and ready for use by EV drivers.

“Public DCFC” means direct current fast charging available for public use.

“Qualifying Customer” means a non-residential customer that takes electric service from Company at the Installation Address, is the owner and operator of the rebated EVSE and EVSI equipment and meets all the Rebate Program rules and requirements set forth in these Program Terms.

“Rebate” means the amounts available to be paid by Company to a Qualifying Customer under the Rebate Program, based on the EVSI and/or EVSE purchased and installed by the Qualifying Customer at the Installation Address, as further described in Table 1 and Table 2 set forth in the “EVSI/EVSE Rebate Program Overview” section below. The maximum Rebate approved by Company for a Qualifying Customer’s Project at an Installation Site will be set forth in the Reservation Letter.

“Rebate Program” means Company’s program approved by the Minnesota Public Utility Commission offering a Qualifying Customer a Rebate in exchange for the Qualifying Customer’s purchase and installation of EVSE and/or EVSI at the Installation Address.

“Reservation Letter” means a formal document sent by the Company to a Qualifying Customer in response to Qualifying Customer’s submission of a Program Application, which notifies the Qualifying Customer of the maximum amount of Rebate that will be available for the Qualifying Customer’s Project at an Installation Site.

“Site Host” means a non-residential customer that takes electric service from the Company at the Installation Address that provides a location for a third party, such as a CaaS Provider, to act as a Qualifying Customer and procure, install and operate EVSE and EVSI equipment.

“Uptime” means the percentage of time a charging port is functional and available for use.

“Vendor” means any individual, company, or organization that offers, sells, distributes, designs, engineers, constructs, installs, maintains, or otherwise provides EVSI or EVSE products or services. This includes, but is not limited to, providers of EV charging infrastructure, EV-related software, hardware, components, consulting services, and firms engaged in the design, engineering, or construction of EV-related facilities or systems. Vendors may operate independently or in partnership with other entities and are responsible for ensuring that their offerings comply with all applicable laws, regulations, and industry standards.

EVSI/EVSE Rebate Program Overview

This Rebate Program is available to any Qualifying Customer who purchases and installs EVSI serving EVSE and/or EVSE at the Qualifying Customer's premise to support the charging of EVs. Customer receiving a Rebate will be fully responsible for coordinating all aspects of the design and installation of the EVSI equipment as well as ongoing maintenance. The Rebates will be administered as up-to amounts based on the Charging Type and Charger Output installed in addition to if the site is in an Environmental Justice Area, or if the site is for Standard or Bidirectional School Bus Charging (as set forth in Table 1 and Table 2 below). The Rebate amounts shall not exceed the total EVSI Costs and EVSE Costs, and in no event exceed the maximum amount of Rebate for a Project set forth in the Qualifying Customer's Reservation Letter.

Rebate amounts will be capped at \$1 million per Project.

Table 1: EVSI L2 and DCFC Rebates

Charging Type	Standard (\$/Port)	EJ (\$/Port)
Level 2	\$6,500	\$10,000
DCFC	\$13,000	\$20,000

Table 2: EVSE Multifamily, Public DCFC, and School Bus DCFC Rebate

Charging Type	Standard (\$/Port)	EJ (\$/Port)
Multifamily Level 2	\$1,200	\$1,800
Public DCFC	\$25,000	\$35,000
Charging Type	Standard (\$/Port)	Bidirectional (\$/Port)
School Bus DCFC	\$20,000	\$40,000

The Rebate Program and Rebates are subject to these Program Terms and conditions contained in this application ("Program Terms"). Rebate amounts and Program Terms are subject to change at any time. Funding for the Rebate Program is limited and must comply with cost-effectiveness requirements as defined by the Minnesota Electric and Natural Gas Energy Conservation and Optimization (ECO) program. Rebates will be available to Qualifying Customers on a first-come, first-served basis based on application submission and project and program cost-effectiveness requirements. The Rebate Program is effective until funding is expended, or the Rebate Program is discontinued. After receiving a Reservation Letter, the available Rebate amount set forth in the Reservation Letter will be reserved for the Project covered by the Reservation Letter for a period of twelve (12) months unless an extension or alternate timeline is approved by the Company. Rebates outlined in the Reservation Letter are subject to change at Project Completion based on final project scope and costs. Projects that do not complete construction and commissioning in the timeline approved and/or do not submit rebate package for payment by the date specified in the Reservation Letter may be reallocated to other projects and may not be available. Prior to purchasing EVSE and/or EVSI, Qualifying Customers should check Company's website or call 1 (800) 895-4999 to determine if the Rebate Program has been discontinued or updated and if Rebates are still available.

Project Eligibility Requirements

To receive a Rebate for EVSI, the Projects must result in the installation of EVSI which serves EVSE for the express purpose of charging an EV at the Installation Site of a Qualifying Customer (a "Charging Port"). EVSI that is installed without a functional Charging Port is not eligible for a Rebate.

All Projects are required to receive pre-approval from the Company in the form of a Reservation Letter (see Rebate process overview below) prior to making any purchase or beginning construction. Any Project executed without a Reservation Letter or with invoices dated prior to receiving a Reservation Letter will not be eligible for a Rebate.

Public DCFC Rebates set forth in Table 2 above are available to any Qualifying Customer or Vendor that installs Public DCFC Charging Stations that must be available for public use. Public charging Rebates will be administered as up-to rebate amounts and require pre-approval from Company prior to installation.

Multifamily EVSE rebates set forth in Table 2 above are available to any Qualifying Customer or Vendor installing EVSE at a Multifamily facility intended for use by residents of that facility.

School Bus EVSE rebates set forth in Table 2 above are available to any Qualifying Customer or Vendor installing EVSE intended to serve Electric School Buses

Bi-Directional School Bus EVSE rebates set forth in Table 2 above are available to any Qualifying Customer or Vendor installing Bi-Directional EVSE intended to serve Electric School Buses

All Projects receiving a Rebate must be built and interconnected according to the Company's standards and be installed by a licensed Master Electrician in the state of Minnesota.

On its Program Application, Qualifying Customers must disclose all additional funding received or applied for on behalf of a Project, including but not limited to any state or federal grant funds in addition to the Rebate. If applicable, these additional funds will be deducted from EVSI Costs or EVSE Costs when determining a Rebate amount.

All EVSE receiving a Rebate through this Rebate Program must meet at least one of the following certifications:

- UL-2202
- UL-2594
- IEC 61851
- IEC 61851-23
- ETL Certification
- NEC Article 625 (must meet subsections listed below)
 - *Section 625.5*
 - *Section 612.18*
 - *Section 625.19*
 - *Section 625.22*

The Qualifying Customer understands and agrees that Company may inspect the installed EVSI or EVSE before or after the Rebate is issued. Company may perform a site visit or request additional information, including but not limited to photographs of the installation. If the Qualifying Customer fails to allow access to the Installation Site and/or the EVSI or EVSE or provide such additional information, the Company may withhold the Rebate.

The Company will maintain a list of Vendors to share with Qualifying Customers upon request. The Company will add or remove Vendors from this list at its discretion. Company's provision of a list of Vendors is not an endorsement of any particular Vendor. The Qualifying Customer is solely responsible for selecting the Vendor and for the work completed by the Vendor.

How to apply for the Rebate

1. The Qualifying Customer must complete the Rebate Program Project intake form found at <https://mn.my.xcelenergy.com/s/business/ev>. The intake form must provide Qualifying Customer contact and location information.
2. Once the Project intake form is received, the Qualifying Customer may be contacted by a Company EV Advisor and/or a Verification Provider to discuss Project details for additional information, if necessary. The EV Advisor will assist the Qualifying Customer in identifying Project needs, interconnection timelines, and provide Vendor information if necessary.
3. The Company EV Advisor will provide the Qualifying Customer with a Program Application to be filled out with all necessary Project information including planned Charging Port installations, estimated costs and timelines along with all other documentation as specified in the Required Project Documentation section of these Program Terms. The Qualifying Customer may consult with and receive assistance from a Vendor while completing the Project Application; however, the Program Application must be submitted by the Qualifying Customer. Only a single Project Application will be accepted per Project.
4. A Company EV Advisor will review the Program Application information and determine the Rebates the Qualifying Customer is eligible to receive and approve a total Rebate amount that is available to the Qualifying Customer for the Project.
5. The Qualifying Customer will receive a Reservation Letter that outlines the approved maximum amount of the Rebate for the Project and the "Completion Date" through which those Rebate funds are reserved for the Project.
6. The Qualifying Customer will sign the Reservation Letter, formally reserving Rebate funds for the Project. The Qualifying Customer can assign the Rebate to a Vendor as outlined in the Rebate Assignment section below. Assignment of a Rebate to a Vendor will be formalized in the Reservation Letter. The maximum Rebate amount set forth in the Reservation Letter will be reserved through the Completion Date stated on the Reservation Letter. All construction and commissioning of the Project must be completed, and all completion documentation required by these Program Term must be submitted prior to the Completion Date, or the Rebate funds will be forfeited.
7. The Qualifying Customer completes the purchase, construction, and commissioning of the Project according to information included in the Program Application and approved in the Reservation Letter. If Project changes (i.e. number of Charging Ports or electrified charging spaces, etc.) occur during construction that would impact the approved Rebate amount defined in the Reservation Letter, the Qualifying Customer must notify the Company EV Advisor within 2 weeks and no later than prior to the completion of the Project. If changes to the Rebate amount occur as a result of the changes in the scope of the Project, the Company may provide a revised Reservation Letter with the new approved Rebate amount. Upon issuance of a revised Reservation Letter, all previous Reservation Letters become void. If Company does not provide a revised Reservation Letter, the Rebate available for the Project will remain as stated in the Reservation Letter. If the project scope remains consistent with what was provided in the Program Application but Rebate eligibility changes due to increases in Project cost, the Company can increase the Rebate amount if funds are available and a Payee or Project cap has not been reached.

8. Upon Project Completion, the Qualifying Customer must submit documentation indicating Project completion as defined below. This will include the EVSI Invoice(s) that identify the EVSI Costs and EVSE Costs eligible for the Rebate.
9. The Company EV Advisor will review the documentation and initiate a Rebate payment based on the documentation provided by the Qualifying Customer and the amounts in the Reservation Letter. This may include a site inspection to confirm that equipment is installed according to the project scope and meets Project Completion requirements as defined in this document.
10. Rebate payments are usually made within 6 to 8 weeks after all documentation required to be submitted by the Qualifying Customer after Project completion has been received by Company and such submission has been processed and approved by Company.

Rebate Assignment

Qualifying Customers may assign a rebate to a Vendor or other third party to receive the Rebate at the point of sale rather than waiting for Completion Paperwork to be reviewed and the Rebate to be processed. This assignment must be indicated in the Program Application and signed by both parties in the Reservation Letter. Rebates must be clearly deducted in their full amount from a Qualifying Customer's invoice at Project Completion to be eligible to receive the Rebate on behalf of the Qualifying Customer.

Required Project Documentation

Qualifying Customers applying for a Rebate are required to submit the following documents in addition to the Program Application when submitting a Project for preapproval:

1. Preliminary design drawings for the site that includes the following:
 - a. One-line diagram
 - b. Site plan or layout
 - c. Panel schedule (optional)
2. Spec sheets of the EVSE and/or EVSI to be installed.
3. Spec sheets of the credit card reader for all public facing chargers (L2 and DCFC)
4. Project Quote or Estimate

After receiving a Reservation Letter and upon Project completion, Qualifying Customers who have received a Reservation Letter for a Rebate must submit the following documents to receive the Rebate.

1. Final site layout and design drawings
2. Spec sheets of the EVSE and/or EVSI installed
3. Spec sheets of the credit card reader for all public facing chargers (L2 and DCFC)
4. Distribution design drawings if applicable
5. Final Project invoices and bill of materials, including the EVSI Invoice
 - a. Project invoices must clearly identify Rebate eligible EVSI Costs and EVSE Costs and invoice date. This can be done using the EVSI Invoice made available by the Company.
 - b. Vendors accepting Rebates on behalf of a Qualifying Customer are required to provide invoices demonstrating that the full approved Rebate amount was deducted from the amount billed to the Qualifying Customer.
 - c. Vendors accepting Rebates on behalf of Qualifying Customers are required to utilize the EVSI Invoice provided by the Company.
6. Electrical permits and accompanying inspection documents
7. Site photos that show operational Charging Stations and EVSI equipment

Additional Rebate Program Terms and Limitations

By submitting the application, the Qualifying Customer certifies that the information provided in the application is true and correct, and the Qualifying Customer understands that if any of the information provided is discovered to be false, Qualifying Customer agrees to pay back any Rebate paid by Company.

Company reserves the right to refuse payment of a Rebate and participation in the Rebate Program if the Qualifying Customer violates the Program Terms.

Any information provided by the Qualifying Customer or in the Rebate Application may be used internally by Company for purposes other than processing the Program Application and may be made available to the Minnesota Public Utility Commission and any Company designated third-party Rebate Program administrator, including the Verification Vendor. Additionally, by submitting a Program Application to participate in the Rebate Program, the Qualifying Customer consents to and authorizes Company to provide the Qualifying Customer's information related to the application or the Rebate Program to third parties for the purpose of administering the Rebate Program, coordinating with other third parties offering EV programs and ensuring that Rebate Program participants are not receiving rebates multiple times for the same equipment and/or costs. All personal information will be handled in accordance with applicable laws, Commission rules, and Company's then current privacy policies.

The Qualifying Customer authorizes Company to send the Qualifying Customer and associated Vendor that has been designated as a Payee in the signed Reservation letter and/or designated Vendor included on the application email messages related to its Program Application. The Qualifying Customer: (i) acknowledges that he/she is the authorized user of the email address provided in the Program Application; and (ii) grants Company express permission to send emails related to the Program Application to that email address and the email address for the Payee (if applicable) and designated Vendor on the application (if applicable) until such permission is expressly revoked by the Qualifying Customer.

The Qualifying Customer is responsible for adhering to all laws, rules, and regulations related to the Project, the EVSI, and/or the EVSE. Prior to installation, the Qualifying Customer is responsible for meeting all Rebate Program requirements and for checking with state, county, or city governments, and homeowner's associations (if any) regarding any applicable codes, conditions, ordinances, restrictions, and rules and regulations. The Qualifying Customer is wholly responsible for the EVSI and EVSE, including that it meets all workmanship standards and applicable requirements in the National Electric Code, Minnesota law, and local municipal codes.

The Qualifying Customer is responsible for all tax liability imposed as a result of the Rebate, if any. Company is not responsible for any taxes imposed on the Qualifying Customer as a result of the Rebate, if any.

Company does not warrant, endorse, or assume liability for the quality, performance, or safety of the EVSI or the EVSE or the manufacturer, Vendor and/or retailer or wholesaler of the EVSI and EVSE. Performance of any product or services and acceptance of labor and materials used is solely the Qualifying Customer's and the Qualifying Customer's responsibility.

The Qualifying Customer acknowledges that neither Company, nor any of its affiliates and their respective employees, consultants, contractors, or agents, (a) are responsible for assuring that the EVSI and EVSE procured installed by Qualifying Customer, Qualifying Customer or any Vendor complies with any particular laws, codes, or industry standards, or (b) have made any representations of any kind regarding (i) the results to be achieved by

the Rebate Program (ii) any EVSI or EVSE; or (iii) any Vendor or any labor provided by a Vendor, including, but not limited to, the qualifications, performance, fitness for use, or safety. Company does not endorse any manufacturer of EVSI or EVSE, or any Vendor by offering these Rebates. Company does not expressly or implicitly warrant the performance or quality of the EVSI or EVSE, or of any Vendor. Company is not liable for any damage caused by the operation or malfunction of the EVSI or EVSE.

Any decisions regarding the selection, design, purchase/lease, use and operation of the EVSI, the EVSE or the any Vendor shall be at the sole discretion and are the sole responsibility of the Qualifying Customer.

Unless prohibited by applicable laws, the Qualifying Customer agree to release and hold harmless Company, its affiliates and their officers, directors, shareholders, employees and contractors from and against any and all causes of action, damages, losses, claims, expenses, demands, costs (including attorneys' fees and expenses and all court, arbitration or other dispute resolution costs), or any of them, resulting from, arising out of, or in any way directly connected with this Rebate Program, Qualifying Customer's receipt of the Rebate, failure to receive the Rebate, or any taxes associated therewith. Company makes no representations or warranties regarding whether Qualifying Customer will or will not qualify to receive the Rebate.

Help with Rebate Application or for Additional Information

Customers interested in the Rebate Program or who need assistance completing the Rebate application can email us at EVAdmin@xcelenergy.com or call us at 800-895-4999.

- Not-Public Document – Not For Public Disclosure
 Public Document – Not-Public Data Has Been Excised
 Public Document

Xcel Energy Information Request No. 2
Docket No.: E002/M-25-142
Response To: Minnesota Office of the Attorney General
Requestor: Katherine Hinderlie
Date Received: January 12, 2026

Question:

Reference: Xcel's 2025 Transportation Electrification Plan, Attachment G, and Xcel's Response to Department of Commerce Information Request No. 017, Attachment A

With reference to Attachment G and DOC IR 17, Attach. A:

- A. Incentive Calcs tab, line 7:
1. Explain how the avoided generation cost estimates were developed.
 2. Explain how the benefits to other ratepayers of avoided generation costs will be realized.
- B. Incentive Calcs tab, line 8:
1. Explain how the avoided T&D cost estimates were developed.
 2. Explain how the benefits to other ratepayers of avoided T&D costs will be realized.
- C. Incentive Calcs tab, line 10:
1. Explain how the avoided T&D cost estimates for DISCO area vehicles were developed.
 2. Explain how the benefits to other ratepayers of avoided DISCO T&D costs will be realized.
- D. Incentive Calcs tab, line 15: Explain how the 0.76 kW/vehicle savings estimate was developed.
- E. Incentive Calcs tab, line 1:
1. Explain how the sign-up credit value (\$50) was chosen.
 2. Explain whether Xcel explored providing different sign-up credit values for standard and DISCO vehicles.
 3. Provide any other analysis of sign-up credit values that Xcel considered.
 4. If the answer to E.2 above is affirmative, explain why Xcel did not propose different sign-up credit values for standard and DISCO vehicles given the higher estimated benefits of DISCO vehicles.
- F. Incentive Calcs tab, lines 2-3:
1. Explain how the annual credit values (\$25 for standard vehicles, \$75 for DISCO vehicles) were chosen.

2. Explain whether Xcel explored providing a larger or smaller differential between annual credit values for standard and DISCO vehicles.
 3. Provide any other analysis of annual credit values that Xcel considered.
- G. Budget Forecast tab, lines 30-32.
1. Explain how Xcel developed its BEV LDV adoption estimates. If Xcel relied on an outside source for its BEV LDV adoption levels, provide the source name, author, and year of the source.
 2. Explain how the BEV LDV adoption estimates account for the loss of federal tax incentives.
- H. Explain how Xcel developed its new and existing vehicle participation rate estimates (Budget Forecast tab, lines 34-43).
- I. Explain how Xcel developed its 15 percent attrition rate estimate (Budget Forecast tab, line 25).
- J. Explain how Xcel developed its 20 percent DISCO participation rate estimate (Budget Forecast tab, line 23).

Any responsive documents must be provided in their unlocked native format with all formulas and links intact.

Response:

- A.
1. The Company used the avoided generation costs approved in the Company's Energy Conservation and Optimization (ECO) 2024-2026 triennial plan.
 2. Any avoided generation costs generated by a program or action are costs that will not have to be borne by ratepayers in future rate cases.
- B.
1. The Company used the avoided T&D costs approved in the Company's Energy Conservation and Optimization (ECO) 2024-2026 triennial plan.
 2. Any avoided T&D costs generated by a program or action are costs that will not have to be borne by ratepayers in future rate cases.
- C.
1. The DISCO T&D avoided costs were determined by modeling managed charging impacts at the feeder level across our system. EV adoption was forecasted at each feeder based on the Company's vehicle and load shapes were created for bulk system optimized EV drivers, distribution optimized EV drivers and unmanaged EV drivers. Various scenarios were then modeled against a baseline scenario to determine how many feeder upgrades could be deferred using distribution optimization managed charging. Assumed feeder upgrade costs were then applied to the number of assumed feeder upgrades and then divided by the number of vehicles on each deferred feeder to calculate an avoided T&D cost per vehicle.

2. Any avoided T&D costs generated by a program or action are costs that will not have to be borne by ratepayers in future rate cases.
- D. The 0.75kW/vehicle value is avoided peak capacity that results from managed charging as provided in our 2025 EV Annual Report.¹ The peak coincident impacts of active managed charging are assumed to be similar to existing passive management programs.
- E.
1. A \$50 signup credit was chosen as it demonstrated a pathway to cost-effectiveness while aligning with existing offerings to reduce customer confusion during the program transition proposed in the TEP.
 2. Yes.
 3. The impacts of adjustments to the bill credits can be analyzed by adjusting the credit amounts in Attachment G provided with our TEP initial filing.
 4. The Company is proposing a single sign-up credit to minimize implementation complexity and avoid customer confusion. With feeders being identified for distribution optimization on an annual basis and the need to map customers to feeders upon enrollment, it may not be apparent at the time of enrollment which incentive tier a customer qualifies for. Making all initial credits equal makes for easier communication and expectation setting with customers in marketing and enrollment communications.
- F.
1. The annual credits were tiered based on the relative grid value provided by each customer type. Distribution Optimized customers provide roughly three times the grid value as a Standard customer which is how the ratios was determined.
 2. Yes.
 3. The impacts of adjustments to the bill credits can be analyzed by adjusting the credit amounts in Attachment G.
- G.
1. The Company generates a vehicle adoption forecast which is used for system planning purposes and reference in various resource plans and distribution planning efforts. This adoption forecast was used by the program team to estimate managed charging participation.
 2. The forecast that was used was generated in 2025 prior to the removal of EV tax credits and therefore does not account for their loss. Subsequent iterations of the Company's adoption forecast will account for changes in federal tax policy.

¹ See Pages 16-17 of our 2025 EV Annual Report submitted May 30, 2025 in Docket No. E002/M-15-111. 0.76 kW/vehicle was calculated by dividing the total avoided capacity from the Optimize Your Charge Pilot, 735 kW, by the total number of participating vehicles, 981.

- H. Participation rates were generated based on data from program implementation in other jurisdictions. Enrollment values as a percentage of registered vehicles were applied to EV adoption forecasts for NSPM.
- I. Program attrition rates were generated based on actual attrition rates from program implementation in other jurisdictions.
- J. DISCO participation rates were based on initial pilot results of our DISCO efforts other jurisdictions. Actual DISCO participation rates from our PSCo Charging Perks program were applied to NSPM participation assumptions.

Preparer: Lucas E. Roach
Title: Sr Mgr, EV Product Portfolio
Department: Clean Transport Product Mgmt
Telephone: 612-330-5568
Date: January 23, 2026

CERTIFICATE OF SERVICE

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

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

xx electronic filing

DOCKET No. E002/M-25-142

Dated this 3rd day of February 2026

/s/

Victor Barreiro
Regulatory Administrator

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
1	Daniel	Abelson	daniel.abelson@metc.state.mn.us	Metropolitan Council		390 Robert Street N. St. Paul MN, 55101 United States	Electronic Service		No	M-25-142
2	Brian	Allen	brian.allen@allenergysolar.com	All Energy Solar, Inc		1642 Carroll Ave Saint Paul MN, 55104 United States	Electronic Service		No	M-25-142
3	Michael	Allen	michael.allen@allenergysolar.com	All Energy Solar		721 W 26th st Suite 211 Minneapolis MN, 55405 United States	Electronic Service		No	M-25-142
4	Ellen	Anderson	ellena@umn.edu	325 Learning and Environmental Sciences		1954 Buford Ave Saint Paul MN, 55108 United States	Electronic Service		No	M-25-142
5	Janet	Anderson	jcainstp@icloud.com	-		1799 Sargent St. Paul MN, 55105 United States	Electronic Service		No	M-25-142
6	Jay	Anderson	jaya@cmpas.org	CMPAS		7550 Corporate Way Suite 100 Eden Prairie MN, 55344 United States	Electronic Service		No	M-25-142
7	MK	Anderson	anderson@fresh-energy.org	Fresh Energy		408 St Peter Street Saint Paul MN, 55102 United States	Electronic Service		No	M-25-142
8	David	Assaf	daassaf@flaherty-hood.com	Flaherty & Hood, P.A.		525 Park Street Suite 470 St. Paul MN, 55102 United States	Electronic Service		No	M-25-142
9	Donna	Attanasio	dattanasio@gwu.edu	George Washington University		2000 H Street NW Washington DC, 20052 United States	Electronic Service		No	M-25-142
10	John	Bailey	bailey@ilsr.org	Institute For Local Self-Reliance		1313 5th St SE Ste 303 Minneapolis MN, 55414 United States	Electronic Service		No	M-25-142
11	Anjali	Bains	bains@fresh-energy.org	Fresh Energy		408 Saint Peter Ste 220 Saint Paul MN, 55102 United States	Electronic Service		No	M-25-142
12	Mark	Bakk	mbakk@lcp.coop	Lake Country Power		26039 Bear Ridge Drive Cohasset MN, 55721 United States	Electronic Service		No	M-25-142
13	Jared	Ballew	jared.ballew@ev.energy	EV.ENERGY CORP		726 18th St. Des Moines IA, 50314 United States	Electronic Service		No	M-25-142
14	Shay	Banton	shayb@irecusa.org	Interstate Renewable Energy Council		600 H Street NE Apt. 341 Washington DC, 20002 United States	Electronic Service		No	M-25-142
15	Laura	Beaton	beaton@smwlaw.com	Shute, Mihaly & Weinberger LLP		396 Hayes Street San Francisco CA, 94102 United States	Electronic Service		No	M-25-142

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
16	Mathias	Bell	mathias@weavegrid.com	WeaveGrid		375 Alabama Street, Suite 325 San Francisco CA, 94110 United States	Electronic Service		No	M-25-142
17	Jeff	Benson	jbenson@southcentralelectric.com	South Central Electric Association		PO Box 150 71176 Tiell Drive St. James MN, 56081 United States	Electronic Service		No	M-25-142
18	Sasha	Bergman	sasha.bergman@state.mn.us		Public Utilities Commission	121 7th PI E Ste 350 St. Paul MN, 55101 United States	Electronic Service		Yes	M-25-142
19	Derek	Bertsch	derek.bertsch@mrenergy.com	Missouri River Energy Services		3724 West Avera Drive PO Box 88920 Sioux Falls SD, 57109-8920 United States	Electronic Service		No	M-25-142
20	Barb	Bischoff	barb.bischoff@nngco.com	Northern Natural Gas Co.		CORP HQ, 714 1111 So. 103rd Street Omaha NE, 68124-1000 United States	Electronic Service		No	M-25-142
21	Ingrid	Bjorklund	ibjorklund@avisenlegal.com	Avisen Legal		901 S. Marquette Ave. #1675 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-142
22	Ingrid	Bjorklund	ingrid@bjorklundlaw.com	Bjorklund Law, PLLC		855 Village Center Drive #256 North Oaks MN, 55127 United States	Electronic Service		No	M-25-142
23	William	Black	bblack@mmua.org	MMUA		Suite 200 3131 Fernbrook Lane North Plymouth MN, 55447 United States	Electronic Service		No	M-25-142
24	Kenneth	Bradley	kbradley@environmentminnesota.org			2837 Emerson Ave S Apt CW112 Minneapolis MN, 55408 United States	Electronic Service		No	M-25-142
25	Jon	Brekke	jbrekke@greenergy.com	Great River Energy		12300 Elm Creek Boulevard Maple Grove MN, 55369-4718 United States	Electronic Service		No	M-25-142
26	Kathleen	Brennan	kbrennan@spencerfane.com	Spencer Fane LLP		100 South Fifth Street, Suite 2500 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-142
27	Sydney R.	Briggs	sbriggs@swce.coop	Steele-Waseca Cooperative Electric		2411 W. Bridge St PO Box 485 Owatonna MN, 55060-0485 United States	Electronic Service		No	M-25-142
28	Mark B.	Bring	mbring@otpc.com	Otter Tail Power Company		215 South Cascade Street	Electronic Service		No	M-25-142

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						PO Box 496 Fergus Falls MN, 56538-0496 United States				
29	Matthew	Brodin	mbrodin@allete.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	M-25-142
30	Ed	Brolin	ed.brolin@rwe.com	RWE Clean Energy		100 Summit Lake Drive Suite 210 Valhalla NY, 10595 United States	Electronic Service		No	M-25-142
31	Christopher	Browning	christopher.browning@nexteraenergy.com			null null, null United States	Electronic Service		No	M-25-142
32	Christina	Brusven	cbrusven@fredlaw.com	Fredrikson Byron		60 S 6th St Ste 1500 Minneapolis MN, 55402-4400 United States	Electronic Service		No	M-25-142
33	Mike	Bull	mike.bull@state.mn.us		Public Utilities Commission	121 7th Place East, Suite 350 St. Paul MN, 55101 United States	Electronic Service		Yes	M-25-142
34	Jerry	Byer	jbyer@itasca-mantrap.com	Itasca-Mantrap Coop. Electrical Ass'n		PO Box 192 Park Rapids MN, 56470 United States	Electronic Service		No	M-25-142
35	Jennifer	Cady	jjcady@mnpower.com	Minnesota Power		30 W Superior St Duluth MN, 55802 United States	Electronic Service		No	M-25-142
36	Daniel T	Carlisle	todd-wad@toddwadena.coop	Todd-Wadena Electric Cooperative		550 Ash Ave NE PO Box 431 Wadena MN, 56482 United States	Electronic Service		No	M-25-142
37	Douglas M.	Carnival	dcarnival@carnivalberns.com	McGrann Shea Carnival Straughn & Lamb		800 Nicollet Mall Ste 2600 Minneapolis MN, 55402-7035 United States	Electronic Service		No	M-25-142
38	Pat	Carruth	pat@mnvalleyrec.com	Minnesota Valley Coop. Light & Power Assn.		501 S 1st St. PO Box 248 Montevideo MN, 56265 United States	Electronic Service		No	M-25-142
39	Gabriel	Chan	gabechan@umn.edu			130 Hubert H. Humphrey Center 301 19th Ave S Minneapolis MN, 55455 United States	Electronic Service		No	M-25-142
40	Ray	Choquette	rchoquette@agp.com	Ag Processing Inc.		12700 West Dodge Road PO Box 2047 Omaha NE, 68103-2047 United States	Electronic Service		No	M-25-142
41	Eric	Clement	eclement@mnpower.com	Minnesota Power		null null, null United States	Electronic Service		No	M-25-142
42	City	Clerk	gregg.engdahl@ci.stcloud.mn.us	City of St. Cloud		400 Second St. S	Electronic Service		No	M-25-142

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						St. Cloud MN, 56301 United States				
43	Joshua	Cohen	josh.cohen@swtchenergy.com	SWTCH Energy, Inc.		Greentown Labs 444 Somerville Avenue Somerville MA, 02143 United States	Electronic Service		No	M-25-142
44	Kenneth A.	Colburn	kcolburn@symbioticstrategies.com	Symbiotic Strategies, LLC		26 Winton Road Meredith NH, 32535413 United States	Electronic Service		No	M-25-142
45	Steve	Coleman	stevecolemanpuma@gmail.com			231 Winifred St W Saint Paul MN, 55107 United States	Electronic Service		No	M-25-142
46	Generic	Commerce Attorneys	commerce.attorneys@ag.state.mn.us		Office of the Attorney General - Department of Commerce	445 Minnesota Street Suite 1400 St. Paul MN, 55101 United States	Electronic Service		Yes	M-25-142
47	Kevin	Cray	kevin@communitysolaraccess.org	CCSA		1644 Platte St Denver CO, 80202 United States	Electronic Service		No	M-25-142
48	George	Crocker	gwillc@nawo.org	North American Water Office		5093 Keats Avenue Lake Elmo MN, 55042 United States	Electronic Service		No	M-25-142
49	Stacy	Dahl	sdahl@minnkota.com	Minnkota Power Cooperative, Inc.		5301 32nd Ave S Grand Forks ND, 58201 United States	Electronic Service		No	M-25-142
50	George	Damian	gdamian@cleanenergyeconomymn.org	Clean Energy Economy MN		13713 Washburn Ave S Burnsville MN, 55337 United States	Electronic Service		No	M-25-142
51	Lisa	Daniels	lisadaniels@windustry.org	Windustry		201 Ridgewood Ave Minneapolis MN, 55403 United States	Electronic Service		No	M-25-142
52	James	Darabi	james.darabi@solarfarm.com			2355 Fairview Ave #101 St. Paul MN, 55113 United States	Electronic Service		No	M-25-142
53	Cody	Davis	cdavis@epeconsulting.com	Electric Power Engineers (ELPC/VS)		null null, null United States	Electronic Service		No	M-25-142
54	Danielle	DeMarre	danielle.demarre@allenergysolar.com	All Energy Solar		1264 Energy Lane St Paul MN, 55108 United States	Electronic Service		No	M-25-142
55	Timothy	DenHerder Thomas	timothy@cooperativeenergyfutures.com	Cooperative Energy Futures		3500 Bloomington Ave. S Minneapolis MN, 55407 United States	Electronic Service		No	M-25-142
56	James	Denniston	james.r.denniston@xcelenergy.com	Xcel Energy Services, Inc.		414 Nicollet Mall, 401-8 Minneapolis MN, 55401 United States	Electronic Service		No	M-25-142

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
57	Carrie	Desmond	carrie.desmond@metrotransit.org	Metropolitan Council		560 6th Avenue North Minneapolis MN, 55411 United States	Electronic Service		No	M-25-142
58	Curt	Dieren	curt.dieren@dgr.com	L&O Power Cooperative		1302 S Union St Rock Rapids IA, 51246 United States	Electronic Service		No	M-25-142
59	Cheryl	Dietrich	cheryl.dietrich@nexteraenergy.com	NextEra Energy Resources, LLC		700 Universe Blvd E1W/JB Juno Beach FL, 33408 United States	Electronic Service		No	M-25-142
60	Diane	Dietz	diane.dietz@state.mn.us		Department of Commerce	Suite 280 85 Seventh Place East St. Paul MN, 55101-2198 United States	Electronic Service		No	M-25-142
61	Ian M.	Dobson	ian.m.dobson@xcelenergy.com	Xcel Energy		414 Nicollet Mall, 401-8 Minneapolis MN, 55401 United States	Electronic Service		No	M-25-142
62	Kristin	Dolan	kdolan@meekeer.coop	Meeker Cooperative Light & Power Assn		1725 US Hwy 12 E. Ste 100 Litchfield MN, 55355 United States	Electronic Service		No	M-25-142
63	Renee	Doyle	guydoyleelectric@gmail.com	Doyle Electric Inc.		PO Box 295 Amboy MN, 56010 United States	Electronic Service		No	M-25-142
64	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 United States	Electronic Service		No	M-25-142
65	Adam	Duininck	aduininck@ncsrcc.org	North Central States Regional Council of Carpenters		700 Olive Street St. Paul MN, 55130 United States	Electronic Service		No	M-25-142
66	Scott	Dunbar	sdunbar@kfwlaw.com	Keyes & Fox LLP		1580 Lincoln St Ste 880 Denver CO, 80203 United States	Electronic Service		No	M-25-142
67	John R.	Dunlop, P.E.	jdunlop@resminn.com	Renewable Energy Services		Suite 300 448 Morgan Ave. S. Minneapolis MN, 55405-2030 United States	Electronic Service		No	M-25-142
68	Hannah	Dunn	hannah.dunn@oakdalemn.gov	City of Oakdale		1584 Hadley Ave N Oakdale MN, 55104 United States	Electronic Service		No	M-25-142
69	Kelly	Dybdahl	kdybdahl@llec.coop	Lyon-Lincoln Electric Cooperative, Inc.		205 W. Hwy. 14 Tyler MN, 56178 United States	Electronic Service		No	M-25-142
70	Brian	Edstrom	briane@cubminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota St Ste W1360 Saint Paul MN, 55101 United States	Electronic Service		No	M-25-142
71	Dick	Edwards	dedwards@ci.maple-grove.mn.us	City of Maple Grove		12800 Arbor Lakes Parkway	Electronic Service		No	M-25-142

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						P O Box 1180 Maple Grove MN, 55311- 6180 United States				
72	William	Ehrlich	wehrlich@tesla.com	Tesla, Inc.		3500 Deer Creek Rd Palo Alto CA, 94304 United States	Electronic Service		No	M-25- 142
73	Kristen	Eide Tollefson	healingsystems69@gmail.com	R-CURE		28477 N Lake Ave Frontenac MN, 55026- 1044 United States	Electronic Service		No	M-25- 142
74	Bob	Eleff	bob.eleff@house.mn	Regulated Industries Cmte		100 Rev Dr Martin Luther King Jr Blvd Room 600 St. Paul MN, 55155 United States	Electronic Service		No	M-25- 142
75	R. Neal	Elliot	rnelliott@aceee.org	American Council for an Energy-Efficient Economy		ACEEE 529 14th St NW Ste 600 Washington DC, 20045 United States	Electronic Service		No	M-25- 142
76	Nadav	Enbar	nenbar@epri.com	EPRI		1117 Quince Ave Boulder CO, 80304 United States	Electronic Service		No	M-25- 142
77	John	Farrell	jfarrell@ilsr.org	Institute for Local Self- Reliance		2720 E. 22nd St Institute for Local Self- Reliance Minneapolis MN, 55406 United States	Electronic Service		No	M-25- 142
78	Christian	Fenstermacher	christian.fenstermacher@owatonnautilities.com	Owatonna Municipal Public Utilities		PO Box 800 208 S Walnut Ave Owatonna MN, 55060 United States	Electronic Service		No	M-25- 142
79	Sharon	Ferguson	sharon.ferguson@state.mn.us		Department of Commerce	85 7th Place E Ste 280 Saint Paul MN, 55101- 2198 United States	Electronic Service		No	M-25- 142
80	Christine	Fox	cfox@itasca-mantrap.com	Itasca-Mantrap Coop. Electric Assn.		PO Box 192 Park Rapids MN, 56470 United States	Electronic Service		No	M-25- 142
81	Kornbaum	Frank	fkornbaum@mnpower.com			null null, null United States	Electronic Service		No	M-25- 142
82	Nathan	Franzen	nathan@nationalgridrenewables.com	Geronimo Energy, LLC		8400 Normandale Lake Blvd Ste 1200 Bloomington MN, 55437 United States	Electronic Service		No	M-25- 142
83	David	Freestate	dfreestate@epri.com	EPRI		942 Corridor Park Blvd Knoxville TN, 37932 United States	Electronic Service		No	M-25- 142
84	Katelyn	Frye	kfrye@mnpower.com	Minnesota Power		30 W Superiot St Duluth MN, 55802-2093 United States	Electronic Service		No	M-25- 142

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
85	Jessica	Fyhrie	jfyhrie@otpco.com	Otter Tail Power Company		PO Box 496 Fergus Falls MN, 56538-0496 United States	Electronic Service		No	M-25-142
86	Edward	Garvey	garveyed@aol.com	Residence		32 Lawton St Saint Paul MN, 55102 United States	Electronic Service		No	M-25-142
87	Allen	Gleckner	agleckner@elpc.org	Environmental Law & Policy Center		35 E. Wacker Drive, Suite 1600 Suite 1600 Chicago IL, 60601 United States	Electronic Service		No	M-25-142
88	Jenny	Glumack	jenny@mrea.org	Minnesota Rural Electric Association		11640 73rd Ave N Maple Grove MN, 55369 United States	Electronic Service		No	M-25-142
89	Sean	Gosiewski	sean@afors.org	Alliance for Sustainability		2801 21st Ave S Ste 100 Minneapolis MN, 55407 United States	Electronic Service		No	M-25-142
90	Scott	Greenbert	scott@nautilusolar.com	Nautilus Solar Energy, LLC		396 Springfield Aver, Ste 2 Summit NJ, 07901 United States	Electronic Service		No	M-25-142
91	Sarah	Groebner	sgroebner@redwoodelectric.com	Redwood Electric Cooperative		60 Pine St Clements MN, 56224 United States	Electronic Service		No	M-25-142
92	Tim	Gross	tgross@fuelingmn.com	Fueling Minnesota		3244 Rice Street St. Paul MN, 55126 United States	Electronic Service		No	M-25-142
93	Cody	Gustafson	cgustafson@mnpower.com			null null, null United States	Electronic Service		No	M-25-142
94	Tom	Guttormson	tom.guttormson@connexusenergy.com	Connexus Energy		14601 Ramsey Blvd Ramsey MN, 55303 United States	Electronic Service		No	M-25-142
95	Natalie	Haberman	townsend@fresh-energy.org	Fresh Energy		408 St Peter St # 350 St. Paul MN, 55102 United States	Electronic Service		No	M-25-142
96	Nicholas	Haeg	haeg@fresh-energy.org			12298 Bass Trail Sauk Centre MN, 56378 United States	Electronic Service		No	M-25-142
97	James	Haler	jhaler@southcentralelectric.com	South Central Electric Association		71176 Tiell Dr P. O. Box 150 St. James MN, 56081 United States	Electronic Service		No	M-25-142
98	Joe	Halso	joe.halso@sierraclub.org	Sierra Club		1536 Wynkoop St Ste 200 Denver CO, 80202 United States	Electronic Service		No	M-25-142
99	Donald	Hanson	dfhanson@ieee.org			P. O. Box 44579 Eden Prairie MN, 55344 United States	Electronic Service		No	M-25-142
100	John	Harlander	john.c.harlander@xcelenergy.com	Xcel Energy		null null, null	Electronic Service		No	M-25-142

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						United States				
101	Kim	Havey	kim.havey@minneapolismn.gov	City of Minneapolis		350 South 5th Street, Suite 315M Minneapolis MN, 55415 United States	Electronic Service		No	M-25-142
102	Todd	Headlee	theadlee@dvigridsolutions.com	Dominion Voltage, Inc.		701 E. Cary Street Richmond VA, 23219 United States	Electronic Service		No	M-25-142
103	Amber	Hedlund	amber.r.hedlund@xcelenergy.com	Northern States Power Company dba Xcel Energy-Elec		414 Nicollet Mall, 401-7 Minneapolis MN, 55401 United States	Electronic Service		No	M-25-142
104	Tiana	Heger	thegeer@mnpower.com	Minnesota Power		30 W. Superior Street Duluth MN, 55802 United States	Electronic Service		No	M-25-142
105	Adam	Heinen	aheinen@dakotaelectric.com	Dakota Electric Association		4300 220th St W Farmington MN, 55024 United States	Electronic Service		No	M-25-142
106	Annete	Henkel	mui@mnuutilityinvestors.org	Minnesota Utility Investors		413 Wacouta Street #230 St.Paul MN, 55101 United States	Electronic Service		No	M-25-142
107	Jessy	Hennesy	jessy.hennesy@avantenergy.com	Avant Energy		220 S. Sixth St. Ste 1300 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-142
108	Mari	Hernandez	mari@irecusa.org	IREC		null null, null United States	Electronic Service		No	M-25-142
109	Katherine	Hinderlie	katherine.hinderlie@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	445 Minnesota St Suite 1400 St. Paul MN, 55101-2134 United States	Electronic Service		No	M-25-142
110	Joe	Hoffman	ja.hoffman@smmpa.org	SMMPA		500 First Ave SW Rochester MN, 55902-3303 United States	Electronic Service		No	M-25-142
111	Michael	Hoppe	lu23@ibew23.org	Local Union 23, I.B.E.W.		445 Etna Street Ste. 61 St. Paul MN, 55106 United States	Electronic Service		No	M-25-142
112	Casey	Horan	choran@edf.org	Environmental Defense Fund		123 Mission St San Francisco CA, 94105 United States	Electronic Service		No	M-25-142
113	Ronald	Horman	rhorman@redwoodelectric.com	Redwood Electric Cooperative		60 Pine Street Clements MN, 56224 United States	Electronic Service		No	M-25-142
114	Frank	Hornstein	frank.hornstein@minneapolismn.gov	City of Minneapolis		350 South 5th Street Minneapolis MN, 55415 United States	Electronic Service		No	M-25-142
115	Samantha	Houston	shouston@ucsusa.org	Union of Concerned Scientists		1825 K St. NW Ste 800 Washington	Electronic Service		No	M-25-142

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						DC, 20006 United States				
116	Lori	Hoyum	lhoyum@mnpower.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	M-25-142
117	Jan	Hubbard	jan.hubbard@comcast.net			7730 Mississippi Lane Brooklyn Park MN, 55444 United States	Electronic Service		No	M-25-142
118	Dean	Hunter	dean.hunter@state.mn.us		Minnesota Department of Labor & Industry	443 Lafayette Rd N St. Paul MN, 55155-4341 United States	Electronic Service		No	M-25-142
119	Reuben	Hunter	bhunter@madisonei.com	Madison Energy Investments		8100 Boone Blvd Suite 430 Vienna VA, 22182 United States	Electronic Service		No	M-25-142
120	Casey	Jacobson	cjacobson@bepc.com	Basin Electric Power Cooperative		1717 East Interstate Avenue Bismarck ND, 58501 United States	Electronic Service		No	M-25-142
121	John S.	Jaffray	jjaffray@jirpower.com	JJR Power		350 Highway 7 Suite 236 Excelsior MN, 55331 United States	Electronic Service		No	M-25-142
122	Robert	Jagusch	rjagusch@mmua.org	MMUA		3025 Harbor Lane N Minneapolis MN, 55447 United States	Electronic Service		No	M-25-142
123	Chris	Jarosch	chris@carrcreekelectricservice.com	Carr Creek Electric Service, LLC		209 Sommers Street North Hudson WI, 54016 United States	Electronic Service		No	M-25-142
124	Alan	Jenkins	aj@jenkinsatlaw.com	Jenkins at Law		2950 Yellowtail Ave. Marathon FL, 33050 United States	Electronic Service		No	M-25-142
125	Richard	Johnson	rickjohnson@cozen.com	Cozen O'Connor		150 S. 5th Street Suite 1200 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-142
126	Sarah	Johnson Phillips	sjphillips@stoel.com	Stoel Rives LLP		33 South Sixth Street Suite 4200 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-142
127	Nate	Jones	njones@hcpd.com	Heartland Consumers Power		PO Box 248 Madison SD, 57042 United States	Electronic Service		No	M-25-142
128	Philip	Jones	phil@evtransportationalliance.org			1402 Third Ave Ste 1315 Seattle WA, 98101 United States	Electronic Service		No	M-25-142
129	Julie	Jorgensen	julie@greenmark.us.com	Greenmark Solar		4630 Quebec Ave N New Hope MN, 55428-4973 United States	Electronic Service		No	M-25-142

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
130	Kevin	Joyce	kjoyce@tesla.com			null null, null United States	Electronic Service		No	M-25-142
131	Mahmoud	Kabalan	mahmoud.kabalan@stthomas.edu	University of St Thomas		2115 Summit Ave. Mail OSS100 School of Engineering Saint Paul MN, 55105 United States	Electronic Service		No	M-25-142
132	Camille	Kadoch	ckadoch@raponline.org	Regulatory Assistance Project		50 State Street Suite 3 Montpelier VT, 05602 United States	Electronic Service		No	M-25-142
133	Cliff	Kaehler	cliff.kaehler@novelenergy.biz	Novel Energy Solutions LLC		4710 Blaylock Way Inver Grove Heights MN, 55076 United States	Electronic Service		No	M-25-142
134	Ralph	Kaehler	ralph.kaehler@gmail.com			13700 Co. Rd. 9 Eyota MN, 55934 United States	Electronic Service		No	M-25-142
135	Michael	Kampmeyer	mkampmeyer@a-e-group.com	AEG Group, LLC		260 Salem Church Road Sunfish Lake MN, 55118 United States	Electronic Service		No	M-25-142
136	Nick	Kaneski	nick.kaneski@enbridge.com	Enbridge Energy Company, Inc.		11 East Superior St Ste 125 Duluth MN, 55802 United States	Electronic Service		No	M-25-142
137	Jack	Kegel	jkegel@mmua.org	MMUA		3025 Harbor Lane N Suite 400 Plymouth MN, 55447-5142 United States	Electronic Service		No	M-25-142
138	William	Kenworthy	will@votesolar.org			1 South Dearborn St Ste 2000 Chicago IL, 60603 United States	Electronic Service		No	M-25-142
139	Samuel B.	Ketchum	sketchum@kennedy-graven.com	Kennedy & Graven, Chartered		150 S 5th St Ste 700 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-142
140	Tom	Key	tkey@epri.com	EPRI		942 Corridor Park Blvd Knoxville TN, 37932 United States	Electronic Service		No	M-25-142
141	Bobby	King	bking@solarunitedneighbors.org	Solar United Neighbors		3140 43rd Ave S Minneapolis MN, 55406 United States	Electronic Service		No	M-25-142
142	Jack	Kluempke	jack.kluempke@state.mn.us		Department of Commerce	85 7th Place East Suite 600 St. Paul MN, 55101 United States	Electronic Service		No	M-25-142
143	Aaron	Knoll	aknoll@greeneespel.com	Greene Espel PLLP		222 South Ninth Street Suite 2200 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-142

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
144	Steve	Kosbab	skosbab@meeker.coop	Meeker Cooperative Light and Power		1725 US Hwy 12 E Litchfield MN, 55355 United States	Electronic Service		No	M-25-142
145	Nathan	Kostiuk	nathan.c.kostiuk@xcelenergy.com	Xcel Energy		414 Nicollet Mall, 401-07 Minneapolis MN, 55401 United States	Electronic Service		No	M-25-142
146	Brian	Krambeer	bkrambeer@mienergy.coop	MiEnergy Cooperative		PO Box 626 31110 Cooperative Way Rushford MN, 55971 United States	Electronic Service		No	M-25-142
147	Michael	Krause	michaelkrause61@yahoo.com			1200 Plymouth Avenue Minneapolis MN, 55411 United States	Electronic Service		No	M-25-142
148	Michael	Krikava	mkrikava@taftlaw.com	Taft Stettinius & Hollister LLP		2200 IDS Center 80 S 8th St Minneapolis MN, 55402 United States	Electronic Service		No	M-25-142
149	Corrina	Kumpe	ckumpe@mysunshare.com			null null, null United States	Electronic Service		No	M-25-142
150	Matthew	Lacey	mlacey@grenergy.com	Great River Energy		12300 Elm Creek Boulevard Maple Grove MN, 55369-4718 United States	Electronic Service		No	M-25-142
151	James D.	Larson	james.larson@avantenergy.com	Avant Energy Services		220 S 6th St Ste 1300 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-142
152	Mark	Larson	mlarson@meeker.coop	Meeker Coop Light & Power Assn		1725 Highway 12 E Ste 100 Litchfield MN, 55355 United States	Electronic Service		No	M-25-142
153	Burnell	Lauer	blauer.sundial@gmail.com	Sundial Solar		3209 W. 76th St #305 Edina MN, 55435 United States	Electronic Service		No	M-25-142
154	Dean	Leischow	dean@sunrisenrg.com	Sunrise Energy Ventures		315 Manitoba Ave Ste 200 Wayzata MN, 55391 United States	Electronic Service		No	M-25-142
155	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	M-25-142
156	Benjamin	Levine	blevine@mnpower.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	M-25-142
157	Becky	Li	bli@rmi.org			17 State St 25th floor unit 2500 New York NY, 10004 United States	Electronic Service		No	M-25-142

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
158	Amy	Liberkowski	amy.a.liberkowski@xcelenergy.com	Xcel Energy		414 Nicollet Mall 7th Floor Minneapolis MN, 55401-1993 United States	Electronic Service		No	M-25-142
159	Carl	Linville	clinville@raponline.org			50 State Street Suite #3 Montpelier VT, 05602 United States	Electronic Service		No	M-25-142
160	Phillip	Lipetsky	greenenergyproductsllc@gmail.com	Green Energy Products		PO Box 108 Springfield MN, 56087 United States	Electronic Service		No	M-25-142
161	Jody	Londo	jody.l.londo@xcelenergy.com	Xcel Energy		414 Nicollet Mall 7th Floor Minneapolis MN, 55401-1993 United States	Electronic Service		No	M-25-142
162	Susan	Ludwig	sludwig@mnpower.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	M-25-142
163	Brian	Lydic	brian@irecusa.org	Interstate Renewable Energy Council, Inc.		PO Box 1156 Latham NY, 12110-1156 United States	Electronic Service		No	M-25-142
164	Madeline	Lydon	madeline.k.lydon@xcelenergy.com	Xcel Energy		401 NICOLLET MALL Floor 7 Minneapolis MN, 55401 United States	Electronic Service		No	M-25-142
165	Richard	Macke	macker@powersystem.org	Power System Engineering, Inc.		10710 Town Square Dr NE Ste 201 Minneapolis MN, 55449 United States	Electronic Service		No	M-25-142
166	Alice	Madden	alice@communitypowermn.org	Community Power		2720 E 22nd St Minneapolis MN, 55406 United States	Electronic Service		No	M-25-142
167	Alex	Magerko	amagerko@epri.com	EPRI		942 Corridor Park Blvd Knoxville TN, 37932 United States	Electronic Service		No	M-25-142
168	Kavita	Maini	kmairi@wi.rr.com	KM Energy Consulting, LLC		961 N Lost Woods Rd Oconomowoc WI, 53066 United States	Electronic Service		No	M-25-142
169	Tom	Mammen	thomas.j.mammen@xcelenergy.com	Xcel Energy		null null, null United States	Electronic Service		No	M-25-142
170	Discovery	Manager	discoverymanager@mnpower.com	Minnesota Power		30 W Superior St Duluth MN, 55802 United States	Electronic Service		No	M-25-142
171	Christine	Marquis	regulatory.records@xcelenergy.com	Xcel Energy		414 Nicollet Mall MN1180-07-MCA Minneapolis MN, 55401 United States	Electronic Service		Yes	M-25-142

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
172	Gregg	Mast	gmast@cleanenergyeconomymn.org	Clean Energy Economy Minnesota		4808 10th Avenue S Minneapolis MN, 55417 United States	Electronic Service		No	M-25-142
173	Jason	Maur	jason.maur@renesolapower.com	Renesota Power Holdings, LLC		850 Canal Street 3rd Floor Stamford CT, 06902 United States	Electronic Service		No	M-25-142
174	Erica	McConnell	emcconnell@elpc.org	Environmental Law & Policy Center		35 E. Wacker Drive, Suite 1600 Chicago IL, 60601 United States	Electronic Service		No	M-25-142
175	Jess	McCullough	jmccullough@mnpower.com	Minnesota Power		30 W Superior St Duluth MN, 55802 United States	Electronic Service		No	M-25-142
176	Sara G	McGrane	smcgrane@felhaber.com	Felhaber Larson		220 S 6th St Ste 2200 Minneapolis MN, 55420 United States	Electronic Service		No	M-25-142
177	Natalie	McIntire	natalie.mcintire@gmail.com	Wind on the Wires		570 Asbury St Ste 201 Saint Paul MN, 55104-1850 United States	Electronic Service		No	M-25-142
178	Matthew	Melewski	matthew@theboutiquefirm.com	Nokomis Energy LLC & Ole Solar LLC		2639 Nicollet Ave Ste 200 Minneapolis MN, 55408 United States	Electronic Service		No	M-25-142
179	Thomas	Melone	thomas.melone@allcous.com	Minnesota Go Solar LLC		222 South 9th Street Suite 1600 Minneapolis MN, 55120 United States	Electronic Service		No	M-25-142
180	Michael	Menzel	mike.m@sagiliti.com	Sagiliti		23505 Smithtown Rd. Suite 280 Excelsior MN, 55331 United States	Electronic Service		No	M-25-142
181	Tim	Mergen	tmergen@meeker.coop	Meeker Cooperative Light And Power		1725 US Hwy 12 E. Suite 100 PO Box 68 Litchfield MN, 55355 United States	Electronic Service		No	M-25-142
182	Pontius	Mike	mpontius@mnpower.com			null null, null United States	Electronic Service		No	M-25-142
183	Brian	Millberg	fwengineering@comcast.net			695 Grand Ave #222 Saint Paul MN, 55105 United States	Electronic Service		No	M-25-142
184	Luther	Miller	luther.c.miller@xcelenergy.com	Xcel Energy		null null, null United States	Electronic Service		No	M-25-142
185	Marc	Miller	mmiller@soltage.com	Soltage, LLC		66 York Street, 5th Floor Jersey City NJ, 07302 United States	Electronic Service		No	M-25-142
186	Marcus	Mills	marcus@communitypowermn.org	Community Power		2720 E 22nd St	Electronic Service		No	M-25-142

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						Minneapolis MN, 55406 United States				
187	Darrick	Moe	darrick@mrea.org	Minnesota Rural Electric Association		11640 73rd Ave N Maple Grove MN, 55369 United States	Electronic Service		No	M-25-142
188	Dalene	Monsebroten	dalene.monsebroten@nmpagency.com	Northern Municipal Power Agency		123 2nd St W Thief River Falls MN, 56701 United States	Electronic Service		No	M-25-142
189	Brian	Monson	brian.t.monson@xcelenergy.com	Xcel Energy		null null, null United States	Electronic Service		No	M-25-142
190	Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP		33 South Sixth St Ste 4200 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-142
191	Susan	Mudd	smudd@elpc.org	Environmental Law and Policy Center		35 E. Wacker Drive, Suite 1600 Chicago IL, 60601 United States	Electronic Service		No	M-25-142
192	Pouya	Najmaie	najm0001@gmail.com	Cooperative Energy Futures		3416 16th Ave S Minneapolis MN, 55407 United States	Electronic Service		No	M-25-142
193	Alex	Nelson	anelson@dakotaelectric.com	Dakota Electric Association		4300 220nd St Farmington MN, 55024 United States	Electronic Service		No	M-25-142
194	Anthony	Nelson	amnelson@otpco.com	Ottertail Power		53233 Sunrise Ln Park Rapids MN, 56470 United States	Electronic Service		No	M-25-142
195	Ben	Nelson	benn@cmpasgroup.org	CMMPA		459 South Grove Street Blue Earth MN, 56013 United States	Electronic Service		No	M-25-142
196	Carl	Nelson	cnelson@mncee.org	Center for Energy and Environment		212 3rd Ave N Ste 560 Minneapolis MN, 55401 United States	Electronic Service		No	M-25-142
197	Darin	Nelson	dnelson@minnetonkamn.gov	City of Minnetonka		14600 Minnetonka Blvd Minnetonka MN, 55345 United States	Electronic Service		No	M-25-142
198	David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency		220 South Sixth Street Suite 1300 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-142
199	Sephra	Ninow	sephra.ninow@energycenter.org	Center for Sustainable Energy		426 17th Street, Suite 700 Oakland CA, 94612 United States	Electronic Service		No	M-25-142
200	Michael	Noble	noble@fresh-energy.org	Fresh Energy		408 Saint Peter St Ste 350 Saint Paul MN, 55102 United States	Electronic Service		No	M-25-142

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
201	Rolf	Nordstrom	rnordstrom@gpisd.net	Great Plains Institute		2801 21ST AVE S STE 220 Minneapolis MN, 55407-1229 United States	Electronic Service		No	M-25-142
202	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	M-25-142
203	David	O'Brien	david.obrien@navigant.com	Navigant Consulting		77 South Bedford St Ste 400 Burlington MA, 01803 United States	Electronic Service		No	M-25-142
204	Logan	O'Grady	logrady@mnseia.org	Minnesota Solar Energy Industries Association		2288 University Ave W St. Paul MN, 55114 United States	Electronic Service		No	M-25-142
205	Patty	O'Keefe	patty.okeefe@sierraclub.org			2525 Emerson Ave S Apt 2 Minneapolis MN, 55405 United States	Electronic Service		No	M-25-142
206	Timothy	O'Leary	toleary@llec.coop	Lyon-Lincoln Electric Cooperative, Inc		P.O. Box 639 Tyler MN, 56178-0639 United States	Electronic Service		No	M-25-142
207	Jeff	O'Neill	jeff.oneill@ci.monticello.mn.us	City of Monticello		505 Walnut Street Suite 1 Monticello MN, 55362 United States	Electronic Service		No	M-25-142
208	Matthew	Olsen	molsen@otpc.com	Otter Tail Power Company		215 South Cascade Street Fergus Falls MN, 56537 United States	Electronic Service		No	M-25-142
209	Russell	Olson	rolson@hcpd.com	Heartland Consumers Power District		PO Box 248 Madison SD, 57042-0248 United States	Electronic Service		No	M-25-142
210	Wendi	Olson	wolson@otpc.com	Otter Tail Power Company		215 South Cascade Street Fergus Falls MN, 56537 United States	Electronic Service		No	M-25-142
211	Carol A.	Overland	overland@legalelectric.org	Legalelectric - Overland Law Office		1110 West Avenue Red Wing MN, 55066 United States	Electronic Service		No	M-25-142
212	Bethany	Owen	bowen@mnpower.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	M-25-142
213	Cezar	Panait	cezar.panait@state.mn.us		Public Utilities Commission	121 7th Place East Suite 350 St. Paul MN, 55101 United States	Electronic Service		No	M-25-142

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
214	Dan	Patry	dpatry@sunedison.com	SunEdison		600 Clipper Drive Belmont CA, 94002 United States	Electronic Service		No	M-25-142
215	Jeffrey C	Paulson	jeff.jcplaw@comcast.net	Paulson Law Office, Ltd.		4445 W 77th Street Suite 224 Edina MN, 55435 United States	Electronic Service		No	M-25-142
216	Dean	Pawlowski	dpawlowski@otpc.com	Otter Tail Power Company		PO Box 496 215 S. Cascade St. Fergus Falls MN, 56537-0496 United States	Electronic Service		No	M-25-142
217	Susan	Peirce	susan.peirce@state.mn.us		Department of Commerce	85 Seventh Place East St. Paul MN, 55101 United States	Electronic Service		No	M-25-142
218	Mary Beth	Peranteau	mperanteau@fredlaw.com	Fredrikson & Byron, P.A.		44 East Mifflin Street Suite 1000 Madison WI, 53703 United States	Electronic Service		No	M-25-142
219	Jennifer	Peterson	jjpeterson@mnpower.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	M-25-142
220	Wess	Pfaff	wes.pfaff@mrenergy.com			null null, null United States	Electronic Service		No	M-25-142
221	Ryan	Pierce	ryan.m.pierce@xcelenergy.com	Xcel Energy		null null, null United States	Electronic Service		No	M-25-142
222	Morgan	Pitz	morgan.pitz@us-solar.com	US Solar		100 N 6th St #410B Minneapolis MN, 55403 United States	Electronic Service		No	M-25-142
223	Hannah	Polikov	hpolikov@aee.net	Advanced Energy Economy Institute		1000 Vermont Ave, Third Floor Washington DC, 20005 United States	Electronic Service		No	M-25-142
224	Crystal	Pomerleau	crystal.r.pomerleau@xcelenergy.com	Xcel		null null, null United States	Electronic Service		No	M-25-142
225	Kristel	Porter	kristel@mnrenewablenow.org	MN Renewable Now		null null, null United States	Electronic Service		No	M-25-142
226	Paula	Prahl	paula.prahl@dominiuminc.com	Dominium		2905 Northwest Blvd Ste 150 Plymouth MN, 55441 United States	Electronic Service		No	M-25-142
227	Kevin	Pranis	kpranis@liunagroc.com	Laborers' District Council of MN and ND		81 E Little Canada Road St. Paul MN, 55117 United States	Electronic Service		No	M-25-142
228	David G.	Prazak	dprazak@otpc.com	Otter Tail Power Company		P.O. Box 496 215 South Cascade Street Fergus Falls MN, 56538-0496 United States	Electronic Service		No	M-25-142

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
229	Matt	Privratsky	matt@nokomisenergy.com	Nokomis Energy		2639 Nicollet Ave Suite 200 Minneapolis MN, 55408 United States	Electronic Service		No	M-25-142
230	Elizabeth	Psihos	elizabeth.psihos@idealenergies.com			null null, null United States	Electronic Service		No	M-25-142
231	Bridget	Rathsack	bridget.rathsack@burnsvillemn.gov	City of Burnsville, MN		100 Civic Center Parkway Burnsville MN, 55337 United States	Electronic Service		No	M-25-142
232	Peter	Reese	preese@sundialsolarenergy.com	Sundial Energy, LLC		3363 Republic Ave Saint Louis Park MN, 55426 United States	Electronic Service		No	M-25-142
233	Generic Notice	Regulatory	regulatory_filing_coordinators@otpc.com	Otter Tail Power Company		215 S. Cascade Street Fergus Falls MN, 56537 United States	Electronic Service		No	M-25-142
234	John C.	Reinhardt		Laura A. Reinhardt		3552 26th Ave S Minneapolis MN, 55406 United States	Paper Service		No	M-25-142
235	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	M-25-142
236	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	M-25-142
237	Micah	Revell	micah.revell@stinson.com	Stinson LLP		50 South Sixth St Ste 2600 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-142
238	Michael	Riewer	mriewer@otpc.com	Otter Tail Power Company		PO Box 4496 Fergus Falls MN, 56538-0496 United States	Electronic Service		No	M-25-142
239	Jonathan	Roberts	jroberts@soltage.com	Soltage		66 York St 5th Floor Jersey City NJ, 07302 United States	Electronic Service		No	M-25-142
240	Noah	Roberts	nroberts@cleanpower.org	Energy Storage Association		1155 15th St NW, Ste 500 Washington DC, 20005 United States	Electronic Service		No	M-25-142
241	Kristi	Robinson	krobinson@star-energy.com	STAR Energy Services, LLC		1401 South Broadway Pelican Rapids MN, 56572 United States	Electronic Service		No	M-25-142
242	Daniel	Rogers	dan@nokomispartners.com			2639 Nicollet Ave Ste 200 Minneapolis MN, 55408 United States	Electronic Service		No	M-25-142

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
243	Michael	Ruiz	michael.ruiz@xcelenergy.com	Xcel Energy		null null, null United States	Electronic Service		No	M-25-142
244	Nathaniel	Runke	nrunke@local49.org			611 28th St. NW Rochester MN, 55901 United States	Electronic Service		No	M-25-142
245	Darla	Ruschen	d.ruschen@bcrea.coop	Brown County Rural Electrical Association		PO Box 529 24386 State Highway 4 Sleepy Eye MN, 56085 United States	Electronic Service		No	M-25-142
246	Delaney	Russell	delaney@mnipl.org	Just Solar Coalition		4407 E Lake Street Minneapolis MN, 55407 United States	Electronic Service		No	M-25-142
247	Kwadwo	Safo	ksafo@dakotaelectric.com	Dakota Electric Association		null null, null United States	Electronic Service		No	M-25-142
248	Robert K.	Sahr	bsahr@eastriver.coop	East River Electric Power Cooperative		P.O. Box 227 Madison SD, 57042 United States	Electronic Service		No	M-25-142
249	Ian	SantosMeeker	ians@ips-solar.com	IPS Solar		null null, null United States	Electronic Service		No	M-25-142
250	Joseph L.	Sathe	jsathe@kennedy-graven.com	Kennedy & Graven, Chartered		150 S 5th St Ste 700 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-142
251	Kenric	Scheevel	kjs@dairy.net	Dairyland Power Cooperative		3200 East Ave S PO Box 817 La Crosse WI, 54602 United States	Electronic Service		No	M-25-142
252	Dean	Schiro	dean.e.schiro@xcelenergy.com	Xcel Energy		null null, null United States	Electronic Service		No	M-25-142
253	Jacob J.	Schlesinger	jschlesinger@keyesfox.com	Keyes & Fox LLP		1580 Lincoln St Ste 880 Denver CO, 80203 United States	Electronic Service		No	M-25-142
254	Jeff	Schoenecker	jschoenecker@dakotaelectric.com	Dakota Electric Association		4300 220th Street W Farmington MN, 55024 United States	Electronic Service		No	M-25-142
255	Peter	Scholtz	peter.scholtz@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	Suite 1400 445 Minnesota Street St. Paul MN, 55101-2131 United States	Electronic Service		No	M-25-142
256	Kay	Schraeder	kschraeder@minnkota.com	Minnkota Power		5301 32nd Ave S Grand Forks ND, 58201 United States	Electronic Service		No	M-25-142
257	Matthew	Schuerger	matthew.schuerger@state.mn.us		Public Utilities Commission	121 7th Place East Suite 350 St. Paul MN, 55101 United States	Electronic Service		No	M-25-142
258	Ronald J.	Schwartz	rschwartz@noblesce.com	Nobles Electric Cooperative		22636 U.S. Hwy. 59 Worthington MN, 56187 United States	Electronic Service		No	M-25-142

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
259	Rob	Scott Hovland	rob.scott-hovland@mrenergy.com	Missouri River Energy Services		3724 W Avera Dr PO Box 88920 Sioux Falls SD, 57109-8920 United States	Electronic Service		No	M-25-142
260	Emma	Searson	esearson@solarunitedneighbors.org	Solar United Neighbors		646 S Barrington Ave Apt 101 Los Angeles CA, 90049 United States	Electronic Service		No	M-25-142
261	Dean	Sedgwick	sedgwick@itascapower.com	Itasca Power Company		PO Box 455 Spring Lake MN, 56680 United States	Electronic Service		No	M-25-142
262	Maria	Seidler	maria.seidler@dom.com	Dominion Energy Technology		120 Tredegar Street Richmond VA, 23219 United States	Electronic Service		No	M-25-142
263	David	Shaffer	david.shaffer@novelenergy.biz	Novel Energy Solutions		2303 Wycliff St Ste 300 St. Paul MN, 55114 United States	Electronic Service		No	M-25-142
264	Patricia	Sharkey	psharkey@environmentallawcounsel.com	Midwest Cogeneration Association.		180 N LaSalle St Ste 3700 Chicago IL, 60601 United States	Electronic Service		No	M-25-142
265	Christopher L.	Sherman	csherman@sherman-associates.com	Solar Holdings LLC		233 Park Ave S Ste 201 Minneapolis MN, 55415 United States	Electronic Service		No	M-25-142
266	Doug	Shoemaker	dougs@charter.net	Minnesota Renewable Energy		2928 5th Ave S Minneapolis MN, 55408 United States	Electronic Service		No	M-25-142
267	Felicia	Skaggs	fskaggs@meeker.coop	Meeker Cooperative Light & Power		1725 US Highway 12 E Suite 100 Litchfield MN, 55355 United States	Electronic Service		No	M-25-142
268	Glen	Skarbakka	glen@s-pllc.com	Skarbakka PLLC		5411 Bartlett Blvd Mound MN, 55364 United States	Electronic Service		No	M-25-142
269	Anne	Smart	anne.smart@chargepoint.com	ChargePoint, Inc.		254 E Hacienda Ave Campbell CA, 95008 United States	Electronic Service		No	M-25-142
270	Joshua	Smith	joshua.smith@sierraclub.org			85 Second St FL 2 San Francisco CA, 94105 United States	Electronic Service		No	M-25-142
271	Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.		76 W Kellogg Blvd St. Paul MN, 55102 United States	Electronic Service		No	M-25-142
272	Trevor	Smith	trevor.smith@avantenergy.com	Avant Energy, Inc.		220 South Sixth Street Suite 1300 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-142

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
273	Rafi	Sohail	rafi.sohail@centerpointenergy.com	CenterPoint Energy		800 LaSalle Avenue P.O. Box 59038 Minneapolis MN, 55459-0038 United States	Electronic Service		No	M-25-142
274	Beth	Soholt	bsoholt@cleangridalliance.org	Clean Grid Alliance		570 Asbury Street Suite 201 St. Paul MN, 55104 United States	Electronic Service		No	M-25-142
275	Marcia	Solie	m.solie@bcrea.coop	Brown County Rural Electrical Association		24386 State Hwy. 4, PO Box 529 Sleepy Eye MN, 56085 United States	Electronic Service		No	M-25-142
276	Braden	Solum	braden.solum@idealenergies.com	iDEAL Energies		5810 Nicollet Ave Minneapolis MN, 55419 United States	Electronic Service		No	M-25-142
277	Karl	Sonneman	karl17@hbci.com	Law Office of Karl W. Sonneman		111 Riverfront Suite 202 Winona MN, 55987 United States	Electronic Service		No	M-25-142
278	Brandon	Stamp	brandon.j.stamp@xcelenergy.com	Xcel Energy		401 Nicollet Mall Minneapolis MN, 55401 United States	Electronic Service		No	M-25-142
279	Sky	Stanfield	stanfield@smwlaw.com	Shute, Mihaly & Weinberger		396 Hayes Street San Francisco CA, 94102 United States	Electronic Service		No	M-25-142
280	Russ	Stark	russ.stark@ci.stpaul.mn.us	City of St. Paul		Mayor's Office 15 W. Kellogg Blvd., Suite 390 Saint Paul MN, 55102 United States	Electronic Service		No	M-25-142
281	Byron E.	Starns	byron.starns@stinson.com	STINSON LLP		50 S 6th St Ste 2600 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-142
282	Kristin	Stastny	kstastny@taftlaw.com	Taft Stettinius & Hollister LLP		2200 IDS Center 80 South 8th Street Minneapolis MN, 55402 United States	Electronic Service		No	M-25-142
283	Lindsey	Stegall	lindsey.stegall@evgo.com	EVgo Services, LLC		11835 W Olympic Blvd Ste 900E Los Angeles CA, 90064 United States	Electronic Service		No	M-25-142
284	Cary	Stephenson	cstephenson@otpc.com	Otter Tail Power Company		215 South Cascade Street Fergus Falls MN, 56537 United States	Electronic Service		No	M-25-142
285	Chad	Stevenson	chad.stevenson@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	445 Minnesota St. Suite 1400 St. Paul MN, 55101 United States	Electronic Service		No	M-25-142

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
286	Tammy	Sundbom	tsundbom@mnpower.com	Minnesota Power		null null, null United States	Electronic Service		No	M-25-142
287	Sherry	Swanson	sswanson@noblesce.com	Nobles Cooperative Electric		22636 US Highway 59 PO Box 788 Worthington MN, 56187 United States	Electronic Service		No	M-25-142
288	Boratha	Tan	btan@votesolar.org	Vote Solar		null null, null United States	Electronic Service		No	M-25-142
289	Bryant	Tauer	btauer@whe.org	Wright-Hennepin		6800 Electric Dr Rockford MN, 55373 United States	Electronic Service		No	M-25-142
290	Dean	Taylor	dtaylor@pluginamerica.org	Plug In America		6380 Wilshire Blvd, Suite 1000 Los Angeles CA, 90048 United States	Electronic Service		No	M-25-142
291	Whitney	Terrill	whitney@mnipl.org	Minnesota Interfaith Power & Light		null null, null United States	Electronic Service		No	M-25-142
292	Daniel	Tikk	daniel.tikk@state.mn.us		Department of Commerce	85 7th Place East Suite 280 Saint Paul MN, 55101 United States	Electronic Service		No	M-25-142
293	Kate	Tohme	ktohme@newleafenergy.com	New Leaf Energy		null null, null United States	Electronic Service		No	M-25-142
294	Stuart	Tommerdahl	stommerdahl@otpc.com	Otter Tail Power Company		215 S Cascade St PO Box 496 Fergus Falls MN, 56537 United States	Electronic Service		No	M-25-142
295	Taige	Tople	taige.d.tople@xcelenergy.com	Northern States Power Company dba Xcel Energy-Elec		414 Nicollet Mall 401 7th Floor Minneapolis MN, 55401 United States	Electronic Service		No	M-25-142
296	Jason	Topp	jason.topp@lumen.com	Qwest Communications Company, LLC.		200 S 5th St Ste 2200 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-142
297	Emma Marshall	Torres	emarshall-torres@convergentep.com			null null, null United States	Electronic Service		No	M-25-142
298	Zack	Townsend	zachary.townsend@brookfieldrenewable.com	Brookfield Renewable		200 Liberty St FL 14 New York NY, 10281 United States	Electronic Service		No	M-25-142
299	Pat	Treseler	pat.jcplaw@comcast.net	Paulson Law Office LTD		4445 W 77th Street Suite 224 Edina MN, 55435 United States	Electronic Service		No	M-25-142
300	Jeff	Triplett	triplettj@powersystem.org	MREA		10710 Town Square Dr NW St 201 Minneapolis MN, 55449 United States	Electronic Service		No	M-25-142
301	Adam	Tromblay	atromblay@noblesce.com	Nobles Cooperative Electric		P.O. Box 58 Slayton MN, 56127-0058 United States	Electronic Service		No	M-25-142

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302	Lise	Trudeau	lise.trudeau@state.mn.us		Department of Commerce	85 7th Place East Suite 500 Saint Paul MN, 55101 United States	Electronic Service		No	M-25-142
303	Alan	Urban	alan.m.urban@xcelenergy.com	Xcel Energy		null null, null United States	Electronic Service		No	M-25-142
304	Matt	Van Arkel	mvanarkel@newleafenergy.com			55 Technology Drive Suite 102 Lowell MA, 01851 United States	Electronic Service		No	M-25-142
305	Gary	Van Winkle	gvanwinkle@mylegalaid.org	Mid-Minnesota Legal Aid		111 N Fifth St Ste 100 Minneapolis MN, 55403 United States	Electronic Service		No	M-25-142
306	John	Vaughn	nik@rreal.org	Rural Renewable Energy Alliance		3963 8th Street SW Backus MN, 55435 United States	Electronic Service		No	M-25-142
307	Ellen	Veazey	lveazey@solarunitedneighbors.org	Solar United Neighbors		1350 Connecticut Ave NW Ste 412 Washington DC, 20036 United States	Electronic Service		No	M-25-142
308	Sam	Villella	sdvillella@gmail.com			10534 Alamo Street NE Blaine MN, 55449 United States	Electronic Service		No	M-25-142
309	Curt	Volkman	curt@newenergy-advisors.com	Fresh Energy		408 St Peter St Saint Paul MN, 55102 United States	Electronic Service		No	M-25-142
310	Wendy	Vorasane	wendy.vorasane@idealenergies.com			null null, null United States	Electronic Service		No	M-25-142
311	Robert J.V.	Vose	rvose@kennedy-graven.com	Kennedy & Graven, Chartered		150 S 5th St Ste 700 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-142
312	Stacy	Wahlund	swahlund@otpc.com	Otter Tail Power Company		215 S. Cascade St Fergus Falls MN, 56537 United States	Electronic Service		No	M-25-142
313	Sarah	Walinga	swalinga@solarcity.com	Energy Freedom Coalition		3055 Clearview Way San Mateo MN, 94402 United States	Electronic Service		No	M-25-142
314	Kevin	Walker	kwalker@beaconinterfaith.org	Beacon Interfaith Housing Collaborative		null null, null United States	Electronic Service		No	M-25-142
315	Roger	Warehime	roger.warehime@owatonnautilities.com	Owatonna Municipal Public Utilities - Gas		208 S Walnut Ave PO BOX 800 Owatonna MN, 55060 United States	Electronic Service		No	M-25-142
316	Jenna	Warmuth	jwarmuth@mnpower.com	Minnesota Power		30 W Superior St Duluth MN, 55802-2093 United States	Electronic Service		No	M-25-142

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
317	Samantha	Weaver	samantha@communitysolaraccess.org	Coalition for Community Solar Access		1380 Monroe St. Washington DC DC, 20010 United States	Electronic Service		No	M-25-142
318	Elizabeth	Wefel	eawefel@flaherty-hood.com	Missouri River Energy Services		525 Park St Ste 470 Saint Paul MN, 55103 United States	Electronic Service		No	M-25-142
319	Sarah	Whebbe	swhebbe@mnseia.org	MnSEIA		445 Minnesota Street Suite 730 St. Paul MN, 55101 United States	Electronic Service		No	M-25-142
320	Joshua	Williams	joshua@highlandfleets.com	Highland Electric Fleets		200 Cummings Center Suite 273-D Beverly MA, 01915 United States	Electronic Service		No	M-25-142
321	Laurie	Williams	laurie.williams@sierraclub.org	Sierra Club		Environmental Law Program 1536 Wynkoop St Ste 200 Denver CO, 80202 United States	Electronic Service		No	M-25-142
322	John	Williamson	john.williamson@state.mn.us	Minnesota Department of Labor and Industry		443 Lafayette Rd N St. Paul MN, 55155-4341 United States	Electronic Service		No	M-25-142
323	Anthony	Willingham	anthony.willingham@electrifyamerica.com	Electrify America		1950 Opportunity Way Suite 1500 Reston VA, 20190 United States	Electronic Service		No	M-25-142
324	Danielle	Winner	danielle.winner@state.mn.us		Department of Commerce	85 7th Place East Suite 500 Saint Paul MN, 55101 United States	Electronic Service		No	M-25-142
325	Heidi	Winter	hwinter@co.murray.mn.us	Murray County		2500 28th Street PO Box 57 Slayton MN, 56172 United States	Electronic Service		No	M-25-142
326	Robyn	Woeste	robynwoeste@alliantenergy.com	Interstate Power and Light Company		200 First St SE Cedar Rapids IA, 52401 United States	Electronic Service		No	M-25-142
327	Terry	Wolf	terry.wolf@mrenergy.com	Missouri River Energy Services		3724 W Avera Dr PO Box Sioux Falls SD, 57109-8920 United States	Electronic Service		No	M-25-142
328	Curtis	Zaun	curtis@cpzlaw.com			3254 Rice Street Little Canada MN, 55126 United States	Electronic Service		No	M-25-142
329	Brian	Zavesky	brianz@mrenergy.com	Missouri River Energy Services		3724 West Avera Drive P.O. Box 88920 Sioux Falls SD, 57108-	Electronic Service		No	M-25-142

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						8920 United States				
330	Christopher	Zibart	czibart@atcllc.com	American Transmission Company LLC		W234 N2000 Ridgeview Pkwy Court Waukesha WI, 53188- 1022 United States	Electronic Service		No	M-25- 142
331	Kurt	Zimmerman	kwz@ibew160.org	Local Union #160, IBEW		2909 Anthony Ln St Anthony Village MN, 55418-3238 United States	Electronic Service		No	M-25- 142
332	Emily	Ziring	eziring@stlouispark.org	City of St. Louis Park		5005 Minnetonka Blvd St. Louis Park MN, 55416 United States	Electronic Service		No	M-25- 142
333	Ari	Zwick	ari.zwick@state.mn.us		Department of Commerce	85 7th Place East Suite 280 Saint Paul MN, 55101 United States	Electronic Service		No	M-25- 142