
**BEFORE THE MINNESOTA OFFICE OF ADMINISTRATIVE HEARINGS
600 North Robert Street
St. Paul, Minnesota 55101**

**FOR THE MINNESOTA PUBLIC UTILITIES COMMISSION
121 7th Place East
Suite 350
St. Paul, Minnesota 55101-2147**

**MPUC Docket No. G-004/GR-19-511
OAH Docket No. 65-2500-36528**

*In the Matter of a Petition by Great Plains Natural Gas Co.,
a Division of Montana-Dakota Utilities Co.,
for Authority to Increase Natural Gas Rates in Minnesota*

**EXCEPTIONS OF THE OFFICE OF THE ATTORNEY GENERAL—
RESIDENTIAL UTILITIES DIVISION TO THE
FINDINGS OF FACT, CONCLUSIONS OF LAW, AND RECOMMENDATION
OF THE ADMINISTRATIVE LAW JUDGE**

July 13, 2020

INTRODUCTION

Pursuant to Minnesota Statutes section 14.61 and Minnesota Rules part 7829.2700, the Office of the Attorney General—Residential Utilities Division (“OAG”) hereby files Exceptions to the June 30, 2020 Findings of Fact, Conclusions of Law, and Recommendation (“Report”) of the Administrative Law Judge (“ALJ”)¹ on Great Plains Natural Gas Co.’s (“Great Plains” or “the Company”) petition for a rate increase.

As in any rate case, the parties to this proceeding raised many complex issues of fact, law, and policy. The ALJ’s Report addresses these issues in a thorough, well-reasoned, and comprehensive manner. While the OAG does not agree with the Report in every respect, the OAG appreciates the care with which the ALJ reviewed the record and compiled her Report.

These Exceptions are limited to (1) minor modifications to support the ALJ’s denial of certain industry-association dues and (2) the ALJ’s recommendation to increase the customer charges for the residential and small-business classes. The fact that other issues are not addressed in these Exceptions does not indicate agreement or waiver, and the OAG continues to support all of the positions that it recommended in its Initial Brief and Reply Brief.

I. DUES TO MINNESOTA UTILITY INVESTORS, INC. AND EDISON ELECTRIC INSTITUTE

The OAG agrees with the ALJ’s conclusions regarding the disallowance of the Minnesota Utility Investors, Inc. (“MUI”) dues and the Edison Electric Institute dues. The OAG recommends the below modifications to the MUI portion of the ALJ’s findings, however, to further strengthen the support for the disallowance of the MUI dues.

¹ Findings of Fact, Conclusions of Law, and Recommendation (June 30, 2020) (hereinafter “ALJ’s Report”).

The OAG recommends that the text of Finding 91 be modified to correct the following inadvertent use of the word “present” instead of “represent”:

91. According to GP, the MUI is:

a grassroots organization, established in 1990, to ~~present~~ represent the interests of individuals and business investors owning shares in utility companies operating in Minnesota. MUI’s principal objective is to enhance the voice and impact of utility shareholders in the development of federal, regional, and state legislative and regulatory policy.¹⁴³

The OAG recommends that the text of Finding 93 be modified to correct the following inadvertent omission of the word “current” from the description of utility shareholders who are eligible for voluntary membership in the MUI:

93. As a trade organization, membership in the group is optional¹⁴⁶ and limited to current utility shareholders.¹⁴⁷ It exists to advance the interests of investors, not ratepayers.

The OAG recommends a modification to Finding 92, footnote 145, which appears to have inadvertently omitted a page in the applicable range:

¹⁴⁵ *Id.* at 8–9, ACB-3.

Finally, the OAG recommends modifications to Finding 95, footnotes 149 and 150, to replace the current citations with citations that more directly support the ALJ’s findings:

¹⁴⁹ Ex. GP-21, TRJ-1 at 3 (Jacobson Direct); Ex. DER-6 at 9 (Byrne Direct).

¹⁵⁰ Ex. OAG-1 at 8 (Lebens Direct); Ex. OAG-2 at 8–9 (Lebens Surrebuttal); Ex. DER-6 at 9 (Byrne Direct); Ex. DER-14 at 8–10 (Byrne Surrebuttal).

II. THE COMMISSION SHOULD MAINTAIN THE EXISTING RESIDENTIAL AND SMALL-BUSINESS CUSTOMER CHARGES.

The OAG takes exception to the ALJ's recommendation to increase the customer charges for residential customers and small-business² customers by \$1.50 per month and \$4.50 per month, respectively.³ For the reasons explained below, the ALJ's decision is not supported by the record, reflects bad policy, and is inconsistent with the Commission's recent decisions in other rate proceedings.

A. OVERVIEW

Great Plains' residential and small-business rates have two main components: a fixed monthly customer charge and a per-dekatherm distribution charge.⁴ The central rate-design decision for these classes is how to allocate the class's rate increase between the customer charge and the distribution charge.⁵ Any increase to the customer charge reduces the portion that must be recovered through an increase to the distribution charge, and vice versa.⁶

Because the customer charge and distribution charge are inversely related, increasing, maintaining, or even eliminating the customer charge has little impact on Great Plains' ability to recover its revenue requirement. This is particularly true where, as here, the utility has implemented revenue decoupling.⁷

Unlike Great Plains, the Company's ratepayers do care how their bills are structured. In particular, the higher the fixed portion of a customer's bill, the less ability the customer has to

² These Exceptions use the label "small-business" to refer to Great Plains' small-firm-general-service customer class.

³ ALJ's Report ¶ 413.

⁴ See Ex. GP-1 app. A at 5-40, -42, -70, -72 (Great Plains' current residential and small-firm-general-service tariffs).

⁵ See Ex. DER-4 at 51 (Zajicek Direct) (stating that "revenue responsibility apportioned to the class must be recovered either through a fixed customer charge or a volumetric distribution charge").

⁶ Ex. OAG-2 at 3 (Lebens Surrebuttal).

⁷ See GP-25 at 20 (Hatzenbuhler Direct) (acknowledging that because of decoupling, the company is "indifferent to the manner in which distribution revenue is collected").

control the amount of his or her bill through energy efficiency and conservation. The OAG therefore recommended retaining the existing residential and small-business customer charges, arguing that doing so would maximize customers' control over their bills, encourage conservation, and preserve customers' ability to pay.⁸

The ALJ, however, concluded that the residential and small-business customer charges should be increased to move them closer to the customer component identified in the Company's class-cost-of-service study ("CCOSS").⁹ In reaching this conclusion, the ALJ adopted the Company's narrow view of rate design as a simple exercise in moving fixed charges closer to "cost." The ALJ's Report also overlooks specific evidence that maintaining the customer charges would encourage conservation and mischaracterizes the OAG's position regarding the impact of a higher customer charge on low-income customers. For these reasons, the Commission should reject the ALJ's recommendation to increase the residential and small-business customer charges and should not adopt her rate-design findings without modifying them consistent with the Summary of Exceptions below.

B. THE ALJ'S REPORT INCORRECTLY TREATS RATE DESIGN AS A SIMPLE EXERCISE IN MATCHING CUSTOMER CHARGES WITH THE THEORETICAL COST OF CONNECTING A CUSTOMER TO THE UTILITY'S SYSTEM.

The entirety of the ALJ's reasoning for increasing the residential and small-business customer charges was that moving the charges toward the CCOSS's customer cost "will reduce intra-class subsidies while avoiding rate shock for customers."¹⁰ Minimizing intraclass subsidies is a valid goal of rate design, but it is not the only goal or even the most important one.

⁸ See OAG Initial Brief at 13–17.

⁹ ALJ's Report ¶¶ 403–406, 413.

¹⁰ ALJ's Report ¶ 413.

Notably, the Commission has not found the CCROSS-identified customer cost to be a compelling basis for increasing residential customer charges, especially where a utility has implemented revenue decoupling. In Xcel Energy’s 2013 rate case, for example, the Commission declined to increase the residential or small-business customer charges, concluding that doing so “would give too much weight to the fixed customer cost calculated in Xcel’s class-cost-of-service study and not enough weight to affordability and energy conservation.”¹¹ Part of the Commission’s reasoning for this conclusion was that decoupling removes the need to increase customer charges to ensure revenue stability.¹²

In Xcel’s 2015 rate case, the Commission again declined to raise the Company’s residential and small-business customer charges, reasoning that “sending efficient price signals is merely one of the Commission’s objectives” and that the agency is expressly directed by statute to encourage conservation and consider ability to pay when designing rates.¹³ The Commission concluded that no party had “demonstrated the need to alter the monthly customer charges that Xcel assesses on residential and small business customers.”¹⁴

Finally, in CenterPoint Energy’s 2015 rate case, the Commission declined to increase the customer charge for any class due to the impact of higher fixed charges on conservation and the presence of a revenue-decoupling mechanism:

The Commission concludes that increasing CenterPoint’s customer charges would place too little emphasis on the need to set rates to encourage conservation. This is particularly true since the

¹¹ *In the Matter of the Application of Northern States Power Company for Authority to Increase Rates for Electric Service in the State of Minnesota*, Docket No. E-002/GR-13-868, Findings of Fact, Conclusions, and Order at 88 (May 8, 2015).

¹² *Id.* The Commission also questioned the validity of Xcel’s class-cost-of-service study as a means of apportioning intraclass responsibility for fixed costs. *Id.* at 89.

¹³ *In the Matter of the Application of Northern States Power Company for Authority to Increase Rates for Electric Service in the State of Minnesota*, Docket No. E-002/GR-15-826, Findings of Fact, Conclusions, and Order at 60 (June 12, 2017).

¹⁴ *Id.* at 61.

Company has a full-decoupling mechanism. One of the benefits of customer charges—in the absence of decoupling—is that they stabilize the utility’s revenue, guaranteeing a minimum amount of recovery each month regardless of customers’ usage. However, decoupling already guarantees that CenterPoint will not fail to recover its revenue requirement due to lower-than-predicted sales.¹⁵

In the current case, the ALJ rests her recommendation to raise the residential and small-business customer charges solely on Great Plains’ CCOSS, despite the fact that the Commission has routinely set customer charges well below “cost” based on other relevant factors that are also present in this case, including decoupling. The Commission should not adopt the ALJ’s recommendation to increase the charges for these classes, but should instead maintain them at their current levels in order to encourage conservation and preserve customers’ ability to pay.

C. THE ALJ’S RECOMMENDATION OVERLOOKS EVIDENCE THAT MAINTAINING THE CUSTOMER CHARGES WOULD RESULT IN SIGNIFICANT CONSERVATION.

No party disputes that maintaining the existing residential and small-business customer charges would give customers a greater incentive to conserve energy than raising them. In fact, the Department calculated the precise amount of conservation that would result from maintaining the existing residential customer charge, estimating that leaving the charge at \$7.50 would result in a 0.67 percent decrease in residential energy usage, all else being equal.¹⁶

The Department nonetheless supported Great Plains’ proposal to increase the residential customer charge, concluding that this amount of energy savings was insignificant.¹⁷ The OAG

¹⁵ *In the Matter of the Application of CenterPoint Energy Resources Corp. d/b/a CenterPoint Energy Minnesota Gas for Authority to Increase Natural Gas Rates in Minnesota*, Docket No. G-008/GR-15-424, Findings of Fact, Conclusions, and Order at 64 (June 3, 2016). The Commission also cited the OAG’s argument that CenterPoint’s cost study was not an accurate measure of the cost of adding a customer to the system as a basis for maintaining the charges. *Id.* The Commission concluded, “Some level of intra-class subsidy is unavoidable; the task is to balance the potential for and magnitude of a subsidy against other rate-design considerations. Here, the Commission finds that that balance favors the existing customer-charge levels.” *Id.* at 65.

¹⁶ Ex. DER-8 at 3 (Zajicek Rebuttal).

¹⁷ Department Initial Brief at 103.

disagreed, noting that Minnesota law encourages utilities to pursue energy savings of 1.5 percent annually, and that the Department has set a goal for Great Plains to achieve 1.03 percent energy savings in 2020 through its conservation-improvement program (“CIP”).¹⁸ The OAG reasoned that 0.67 percent savings would be a significant amount of energy conservation compared to these existing regulatory goals, particularly if the savings could be achieved without resort to costly CIP measures for which customers must pay.¹⁹

The ALJ’s Report fails to address the substance of the OAG’s argument or acknowledge the Department’s evidence of conservation, simply stating, “as both the DOC-DER and GP determined, the relatively small change in the basic service charge per month (\$1.50 per month for residential users, \$4.50 for small firm users, and \$6.50 for large firm users) is not significant enough to realistically impact consumer energy conservation behavior.”²⁰ The Commission should decline to adopt this reasoning and should instead accept the Department’s record evidence that maintaining the customer charges will result in significant energy savings.

D. THE ALJ’S REPORT MISCHARACTERIZES THE OAG’S POSITION WITH REGARD TO THE IMPACT OF A CUSTOMER-CHARGE INCREASE ON LOW-INCOME RESIDENTIAL CUSTOMERS.

Among the bases for the OAG’s recommendation to maintain the existing customer charges was that a higher monthly fixed charge “would disadvantage customers that use less energy, because the fixed charge would be a higher percentage of their overall bill.”²¹

The ALJ found that “[t]he OAG makes an assumption that low-income customers are also low-use customers Evidence, however, shows that low-income customers may actually use slightly more energy than average residential customers due to less access to energy efficient

¹⁸ OAG Reply Brief at 5 & n.29.

¹⁹ *Id.*; see also Ex. OAG-2 at 5 (Lebens Surrebuttal).

²⁰ ALJ’s Report ¶ 409.

²¹ Ex. OAG-1 at 7 (Lebens Direct).

residences and appliances.”²² She concluded that “the proposed increase in the basic service charge could actually negatively impact low-income customers.”²³

The OAG believes that the ALJ intended to conclude that *maintaining the existing charge* could negatively impact low-income customers. More importantly, the ALJ’s Report mischaracterizes the OAG’s position. The OAG argued that increasing the customer charges would harm *low-usage* customers. Contrary to the ALJ’s assertion, this argument does not depend on an assumption that low-income customers are low-usage customers. And while the ALJ’s summary of the evidence of low-income usage levels—that the average low-income customer “may” use slightly more energy than the average residential customer—is accurate, it supports only the rather unhelpful conclusion that maintaining the existing charge *might* negatively impact the average low-income customer.

Although the impact on low-income residential customers of a customer-charge increase is unclear, the Commission need not resolve this issue because low-income assistance programs are available to help these customers afford utility service.²⁴ Such programs are a more appropriate, targeted mechanism for addressing low-income affordability than adjusting the rate design for all residential customers.²⁵ Moreover, Great Plains has made available to all customers a Balanced Billing Program that would smooth out any increased seasonal variability in customer bills that may result from a relatively lower customer charge and higher distribution charge.²⁶ For these reasons, the Commission should adopt the modified findings set forth below.

²² ALJ’s Report ¶ 410.

²³ *Id.*

²⁴ Ex. OAG-2 at 3–4 (Lebens Surrebuttal).

²⁵ *Id.* at 4.

²⁶ *See id.* at 6; Ex. GP-1 app. A at 6-30 (describing Balanced Billing Program).

E. SUMMARY OF EXCEPTIONS

For the reasons set forth above as well as those argued by the OAG in the record, the OAG recommends that the ALJ's findings regarding the residential and small-business customer charges be adopted with the following modifications:

408. The OAG articulated three reasons why the basic customer charge should not be increased: (1) it discourages conservation; (2) it disproportionately impacts low-usage users; and (3) it is inconsistent with monopoly regulation principles. ~~None of these claims were substantiated in the hearing record.~~ Because retaining the existing residential and small-business customer charges would increase conservation, maximize customers' control over their bills, and preserve their ability to pay, the Commission adopts the OAG's recommendation not to increase them.

409. ~~First, as both the DOC DER and GP determined, the relatively small change in the basic service charge per month (\$1.50 per month for residential users, \$4.50 for small firm users, and \$6.50 for large firm users) is not significant enough to realistically impact consumer energy conservation behavior the record establishes that leaving the residential customer charge at \$7.50 would encourage conservation. Specifically, the Department estimated the likely impact to be a 0.67 percent decrease in residential energy usage.²⁷ The Department did not undertake a similar analysis for the small firm general service class, but it is reasonable to infer that the energy savings would be similar to the residential class's. Energy savings of 0.67 percent is significant when compared to both Minnesota's energy-savings goal (1.5 percent)²⁸ and Great Plains' individual goal (1.03 percent).²⁹~~

410. ~~Second, the basic service charge accurately reflects fixed costs and decreases intra class subsidies. The OAG makes an assumption that low income customers are also low use customers who would benefit from costs being recovered on a volumetric basis retaining the existing charges preserves customers' ability to pay by maximizing their ability to reduce their bills through reduced usage. Evidence, however, shows that low-income customers may actually use slightly more energy than average~~

²⁷ Ex. DER-8 at 3 (Zajicek Rebuttal).

²⁸ See Minn. Stat. §§ 216B.241, subd. 1c(b), .2401.

²⁹ See *In the Matter of Great Plains Natural Gas's 2020 Conservation Improvement Program Extension Plan*, Docket No. G-004/CIP-16-121, Department Decision at 7 (Nov. 26, 2019).

~~residential customers due to less access to energy efficient residences and appliances. Thus, the proposed increase in the basic service charge could actually negatively impact low income customers. Although the evidence is inconclusive on this point, low-income, high-usage ratepayers have protection from higher volumetric charges both through low-income assistance programs³⁰ and through the Company's Balanced Billing Program.³¹~~

~~411. Third, monopoly regulation is intended to prevent utilities from asserting monopoly power. It is not intended to unreasonably restrict how utilities collect payment. Moreover, fixed delivery charges are used by a variety of competitive market firms, such as furniture stores, hardware stores, and grocery stores, to collect fixed expenses. In GP's case, the basic customer charge is intended to recover the fixed expenses associated with connecting the customer's access to safe, reliable service regardless of the amount of natural gas consumed. Notably, the residential basic service charge is in line with the other four regulated case distribution utility companies serving Minnesota, which have residential basic service charges ranging from \$8.50 to \$9.50 per month.~~

~~412. For these reasons, it is recommended that the Commission approve GP's proposed increases to the residential and general service customer classes.~~

~~413. In sum, the Administrative Law Judge finds that GP's proposal to increase the basic customer charge for the residential class by \$1.50 a month, the small firm general class by \$4.50 a month, and the large firm general service class by \$6.50 a month is reasonable because it will reduce intra class subsidies while avoiding rate shock for customers.~~

CONCLUSION

The ALJ's Report does a commendable job of distilling the issues and positions of the parties in this rate case, and the OAG agrees with many of the recommendations made in the Report. There are several issues to which the OAG takes exception, however, and the OAG

³⁰ Ex. OAG-2 at 3-4 (Lebens Surrebuttal).

³¹ *Id.* at 6.

recommends that the Commission adopt the modifications to the findings described above to establish rates that meet the required standard.

Dated: July 13, 2020

Respectfully submitted,

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Attorney General
State of Minnesota

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July 13, 2020

Mr. Will Seuffert
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
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Re: *In the Matter of a Petition by Great Plains Natural Gas Co., a Division of Montana-Dakota Utilities Co., for Authority to Increase Natural Gas Rates in Minnesota*
MPUC Docket No. G-004/GR-19-511, OAH Docket No. 65-2500-36528

Dear Mr. Seuffert,

Enclosed and e-filed in the above-referenced matter please find the Exceptions Of The Office Of The Attorney General—Residential Utilities Division To The Findings Of Fact, Conclusions Of Law, And Recommendation Of The Administrative Law Judge.

By copy of this letter all parties have been served. A Certificate of Service is also enclosed.

Sincerely,

/s/ **Kristin Berkland**

KRISTIN BERKLAND

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Enclosure

CERTIFICATE OF SERVICE

Re: *In the Matter of a Petition by Great Plains Natural Gas Co., a Division of Montana-Dakota Utilities Co., for Authority to Increase Natural Gas Rates in Minnesota*

MPUC Docket No. G-004/GR-19-511, OAH Docket No. 65-2500-36528

I, JUDY SIGAL, hereby certify that on the 13th day of July, 2020, I e-filed with eDockets the Exceptions Of The Office Of The Attorney General—Residential Utilities Division To The Findings Of Fact, Conclusions Of Law, And Recommendation Of The Administrative Law Judge and served a true and correct copy of the same upon all parties listed on the attached service list as receiving “Electronic Service” by e-mail and/or electronic submission.

/s/ Judy Sigal

| First Name | Last Name | Email | Company Name | Address | Delivery Method | View Trade Secret | Service List Name |
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