



414 Nicollet Mall
Minneapolis, MN 55401

November 6, 2025

—Via Electronic Filing—

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

RE: SUPPLEMENTAL FILING
XCEL ENERGY'S 2024 ANNUAL REPORT AND PETITION ON SERVICE QUALITY
PERFORMANCE AND PROPOSED RELIABILITY MEASURES
DOCKET NO. E002/M-25-27

Dear Ms. Bergman:

Northern States Power Company, doing business as Xcel Energy, submits to the Minnesota Public Utilities Commission the attached Supplement to the Company's 2024 Safety, Reliability and Service Quality Annual Report and Petition submitted April 1, 2025 in the above-noted docket.

This Supplement has been delayed by waiting for the IEEE's Distribution Reliability Working Group (DRWG) to publish annual benchmarking results for different size utilities. Benchmarks for medium and large utilities are needed to comply with Order Point 4 in the Commission's December 5, 2023 Order in Docket No. E002/M-23-73. While the DRWG released its benchmarking results for 2024 on August 15, 2025, these did not include separate benchmarking results for different size utilities, and as of the November 6 due date for Supplemental Comments, the DRWG still has not provided benchmarks by utility size. In order to meet the Supplemental Comments deadline, the Company developed an Alternate Method to calculate medium and large utility second quartile benchmarks. We describe that method here, and compare the Company's 2024 reliability performance to both the DRWG benchmarks for all utilities, and to the Company's Alternate Method calculated benchmarks for medium and large utilities.

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 Nathan Kostiuk at nathan.c.kostiuk@xcelenergy.com or 612-215-4629 or me at nicholas.f.martin@xcelenergy.com or 612-330-6255 if you have any questions regarding this filing.

Sincerely,

/s/

NICHOLAS MARTIN
DIRECTOR, STRATEGIC OUTREACH AND ADVOCACY

Enclosure
c: 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 NORTHERN STATES
POWER COMPANY'S ANNUAL REPORT ON
SAFETY, RELIABILITY, AND SERVICE
QUALITY FOR 2024; AND PETITION FOR
APPROVAL OF ELECTRIC RELIABILITY
STANDARDS FOR 2025

DOCKET NO. E002/M-25-27

SUPPLEMENTAL FILING

INTRODUCTION

Northern States Power Company, doing business as Xcel Energy, submits to the Minnesota Public Utilities Commission this Supplement to our April 1, 2025 Annual Report on Safety, Reliability, and Service Quality (SRSQ) for 2024. We submit this filing in compliance with Order Point 4 in the Commission's December 5, 2023 Order in Docket No. E002/M-23-73, which requires the Company to submit a supplemental filing 30 days after IEEE publishes its annual reliability benchmarking results, comparing the Company's statewide reliability to the IEEE benchmarking results.

This supplemental filing has been delayed by waiting for the IEEE's Distribution Reliability Working Group (DRWG) to publish annual benchmarking results for different size utilities. The DRWG released its benchmarking results for 2024 on August 15, 2025, but these did not include separate benchmarking results for small, medium and large utilities, as in prior years. As of the November 6 due date for supplemental comments,¹ the DRWG has still not provided benchmarks by utility size. In order to meet the supplemental comments deadline, the Company developed an Alternate Method to derive medium and large utility second quartile benchmarks; we describe that method here. We compare the Company's 2024 reliability

¹ September 19, 2025 Notice of Second Extended Supplemental Comment Period. *In the Matter of Northern States Power Co. d/b/a Xcel Energy-Electric's 2024 Annual Safety, Reliability, and Service Quality Report*. Docket No. E002/M-25-27.

performance to both the DRWG benchmarks for all utilities, and to the Company's Alternate Method calculated benchmarks for medium and large utilities.

As we committed in our April 1 filing, we also provide in this Supplement updated graphs on the Company's reliability by work center to reflect the IEEE benchmarking results for 2024 that are now available. With this additional information, we continue to request that the Commission accept our SRSQ annual report for 2024 as updated in this Supplement, and approve our proposed reliability standards for 2025 as detailed in our April 1, 2025 filing and discussed below.

SUPPLEMENTAL INFORMATION

I. STATEWIDE RELIABILITY FOR 2024

Order Point 4 in the Commission's December 5, 2023 Order in Docket No. E002/M-23-73 states:

The Commission hereby sets Xcel Energy's 2023 statewide reliability standard at the IEEE benchmarking second quartile for large utilities; sets Xcel's Southeast and Northwest work center reliability standards at the IEEE benchmarking second quartile for medium utilities; and sets Xcel's Metro East and Metro West work center reliability center standards at the IEEE benchmarking second quartile for large utilities.

Xcel must file a supplemental filing to its 2023 service quality report 30 days after IEEE publishes the 2022 benchmarking results. The supplemental filing must include an explanation for any standards the utility did not meet.

A. Comparison to IEEE DRWG Benchmarks for All Utilities

Supplemental Table A below provides the Company's Minnesota service territory-wide and work center specific reliability for SAIDI, SAIFI, and CAIDI compared to the standards set by the Commission. The standards set by the Commission are the IEEE DRWG benchmarking results for 2024.

Note that Supplemental Table A compares the Company's reliability performance to the IEEE DRWG benchmarks at the second quartile for **all** utilities. As of the date of this filing, the DRWG has not published separate benchmarking results for small, medium and large utilities. In the following section, we propose an Alternate Method based on calculated benchmarks for medium and large utilities.

Supplemental Table A
Minnesota Service Territory Reliability – 2024

		Performance Results	IEEE DRWG Standards All Participants
Minnesota	SAIDI	110.04	137
	SAIFI	1.08	1.06
	CAIDI	101.95	124
Metro East	SAIDI	115.50	137
	SAIFI	1.08	1.06
	CAIDI	107.15	124
Metro West	SAIDI	101.37	137
	SAIFI	1.14	1.06
	CAIDI	88.58	124
Northwest	SAIDI	122.44	137
	SAIFI	0.92	1.06
	CAIDI	132.86	124
Southeast	SAIDI	121.49	137
	SAIFI	0.92	1.06
	CAIDI	131.52	124

Referencing Supplemental Table A, on a Minnesota service territory-wide basis, the Company met the reliability thresholds for SAIDI and CAIDI for 2024 at the IEEE benchmarking second quartile for all utilities. The Company missed the SAIFI reliability threshold by 0.02 interruptions.

Similarly, on a work center basis, the Metro East and Metro West work center met the reliability thresholds for SAIDI and CAIDI for 2024 at the second quartile for all utilities. The Metro East work center missed SAIFI second quartile by 0.02 interruptions. The Metro West work center missed SAIFI second quartile by 0.08 interruptions.

The Northwest and Southeast work centers met SAIFI and SAIDI reliability thresholds for 2024 at the IEEE benchmarking second quartile for all utilities. Northwest work center missed CAIDI second quartile by 8.86 minutes. Southeast work center missed CAIDI second quartile by 7.52 minutes.

B. Alternate Method for Medium and Large Utility Benchmarking

The 2024 IEEE DRWG benchmarking results published on August 15, 2025 did not include benchmarking data by utility size, and as of the due date of this filing, IEEE’s

DRWG has still not provided benchmarks by utility size. As a result, for the 2024 reporting year results, there are no medium or large utility benchmarks against which to compare the Company's reliability performance.

In an effort to determine 2024 medium and large utility second quartile benchmarks as required by Order Point 4 in the Commission's December 5, 2023 Order in Docket No. E002/M-23-73, the Company applied the following approach:

1. Historical Comparison: Yearly differences between Medium and Large utility quartiles and the All Participant data were calculated for each year from 2010 through 2023.
2. Averaging Differences: These annual differences were averaged over the 14-year period to determine a representative adjustment factor for each utility size category.
3. 2024 Benchmark Estimation: The calculated average difference was then applied to the 2024 All Participant value to estimate second quartile benchmark values for medium and large utilities.
4. Correlation Assessment: A strong correlation was observed between Medium and All Participant data, as well as between Large and All Participant data, supporting the validity of the adjustment approach.
5. Variability Note: Among the metrics analyzed, the SAIFI value for Large utilities showed the greatest variability when compared to All Participant data, indicating that this metric may be more sensitive to utility size or operational differences.

The results can be found in Supplemental Table A.1, which compares the Company's 2024 reliability performance to the Alternate Method benchmarks. The IEEE DRWG large and medium utility benchmarks for 2023 are also shown; we do not compare to those 2023 benchmarks, but simply provide them for perspective on the Alternate Method benchmarks.

**Supplemental Table A.1
Minnesota Service Territory Reliability – 2024**

		Performance Results	Alternate Method benchmarks	IEEE DRWG benchmarks for large and medium utilities (2023)
Minnesota	SAIDI	110.04	126	114
	SAIFI	1.08	0.98	0.96
	CAIDI	101.95	123	126
Metro East	SAIDI	115.50	126	114
	SAIFI	1.08	0.98	0.96
	CAIDI	107.15	123	126
Metro West	SAIDI	101.37	126	114
	SAIFI	1.14	0.98	0.96
	CAIDI	88.58	123	126
Northwest	SAIDI	122.44	144	121
	SAIFI	0.92	1.09	1.00
	CAIDI	132.86	126	139
Southeast	SAIDI	121.49	144	121
	SAIFI	0.92	1.09	1.00
	CAIDI	131.52	126	139

Referencing Supplemental Table A.1, on a Minnesota service territory-wide basis, the Company met the reliability thresholds for SAIDI and CAIDI for 2024 at the Alternate Method calculated benchmarking second quartile for large utilities while missing the SAIFI second quartile by 0.10 interruptions.

On a work center basis, the Metro East and Metro West work center met the reliability thresholds for SAIDI and CAIDI for 2024 at the calculated benchmarking second quartile for large utilities. The Metro East work center missed SAIFI second quartile by 0.10 interruptions. The Metro West work center missed SAIFI second quartile by 0.16 interruptions.

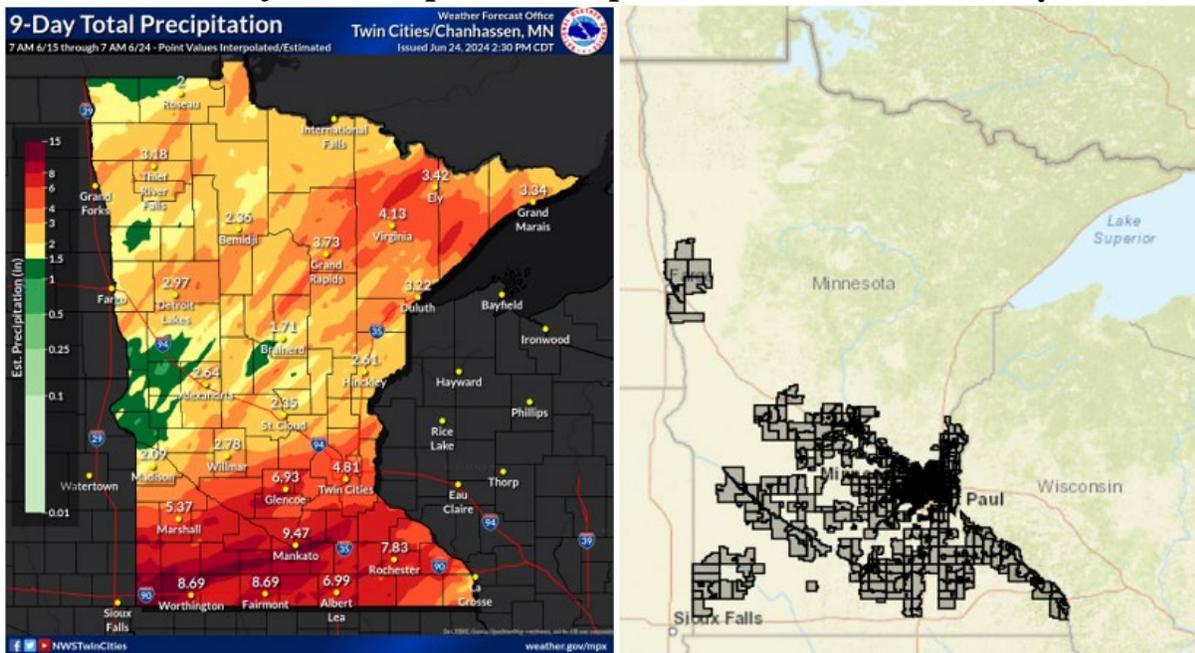
The Northwest and Southeast work centers met SAIFI and SAIDI reliability thresholds for 2024 at the calculated benchmarking second quartile for medium utilities. The Northwest work center missed CAIDI second quartile by 6.86 minutes. The Southeast work center missed CAIDI second quartile by 5.52 minutes.

In 2024, electric reliability in Minnesota was notably impacted by multiple weather-related events. Utilities across the state experienced increased interruptions due to

severe storms, vegetation, saturated soil and flooding, and equipment failures linked to extreme weather conditions. The Company’s large geographic service area, combined with a diverse distribution system in the densely populated area in Minnesota, magnifies the overall impact on reliability of large, widespread events such as the June 2024 storms, recognized by Minnesota as the top two weather events in 2024. Outside of Major Event Days (MEDs), residual post-storm outages from weak tree branches, poles, or other latent events after a large storm can increase SAIFI and SAIDI when a smaller storm arrives. Northern States Power experienced 50 percent more Work Center MEDs in 2024 compared to 2023, and more than any of the prior 10 years.

Comparing Northern States Power’s territory served to the 9-Day Total Precipitation map from the June 2024 storms shows that much of the Company’s territory falls within the most impacted parts of Minnesota.

Figure 1
MN June Precipitation Map & NSPM Service Territory



We have provided information around Minnesota and work centers in our April 1, 2025 filing. Graphs 1(A-D) identify the top outage causes for Minnesota and work centers in 2024. Graphs 5 through 16 show the five-year trend of all three indices along with top level and cause of outages from the current year. Tables 14 through 17 list transmission and distribution events along with MED and moderate storm activity information. Upon review of that information, we believe those discussions provide insight into outages and work center events contributing to year end indices results.

II. PROPOSED RELIABILITY STANDARDS FOR 2025

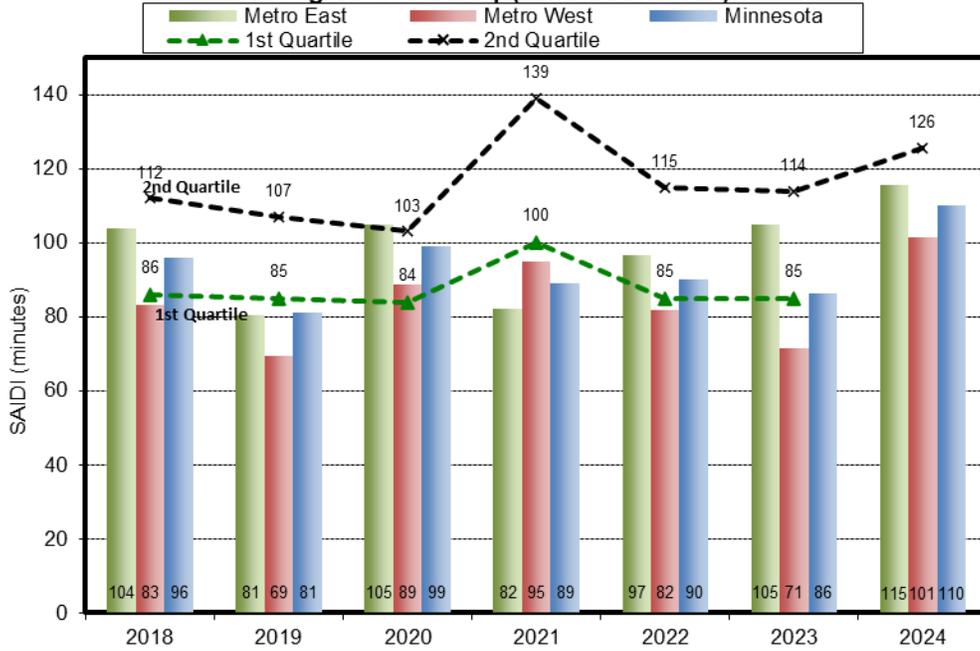
In our Annual Report and Petition, we proposed reliability standards for 2025 as required under Minn. R. 7826.0600. Specifically, we proposed a benchmarking standard for each work center similar to the standard the Commission set for Minnesota overall. For the Company's Metro East and Metro West work centers, we proposed the IEEE benchmark for large utilities. This would be the same standard as utilized for Minnesota. For the two more rural areas of the Northwest and Southeast work centers, we proposed the IEEE benchmark for medium utilities. The standard for all proposals is to achieve metrics at or better than the second quartile.

Because our proposed reliability standards for 2025 are based on IEEE benchmarking results that will be published in 2026, we provided graphs in our Annual Report showing historic reliability by work center compared to IEEE benchmarking results for 2018-2023. With the 2024 IEEE results now available, this Supplement updates Graphs 20 through 25 from our April 1 filing to include the applicable 2024 IEEE benchmarking results for each work center for SAIDI, SAIFI, and CAIDI. Updated Graphs 20, 21, and 22 provide the large utility data for our Metro West and Metro East work centers, as well as for our Minnesota service territory overall.² Updated Graphs 23, 24, and 25 provide the medium utility data for our Southeast and Northwest work centers. Graphs 20 through 25 are updated to include the "Alternate Method" calculated second quartile benchmarks value for 2024.

² In our April 1, 2025 filing, we provided separate graphs showing reliability for the NSPM operating company, covering the Company's service territories in Minnesota, North Dakota and South Dakota (Graphs 2, 3, and 4). However, in this Supplement we only update the graphs related to reliability for our Minnesota service territory, which is the reliability data relevant to the state-wide standards established by the Commission.

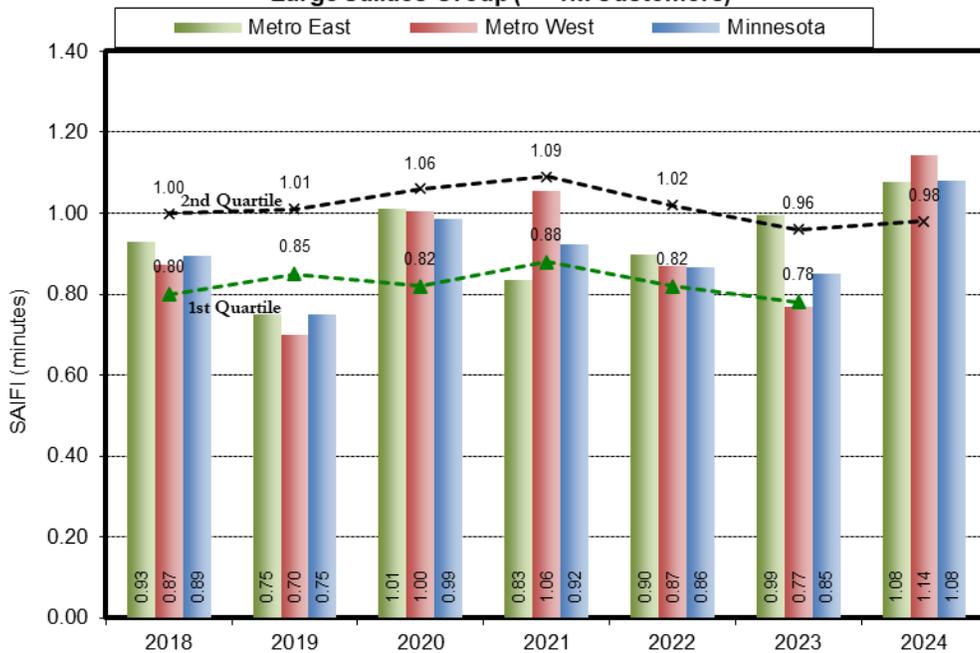
Updated Graph 20

IEEE DRWG Benchmark SAIDI Large Utilities Group (>= 1M Customers)

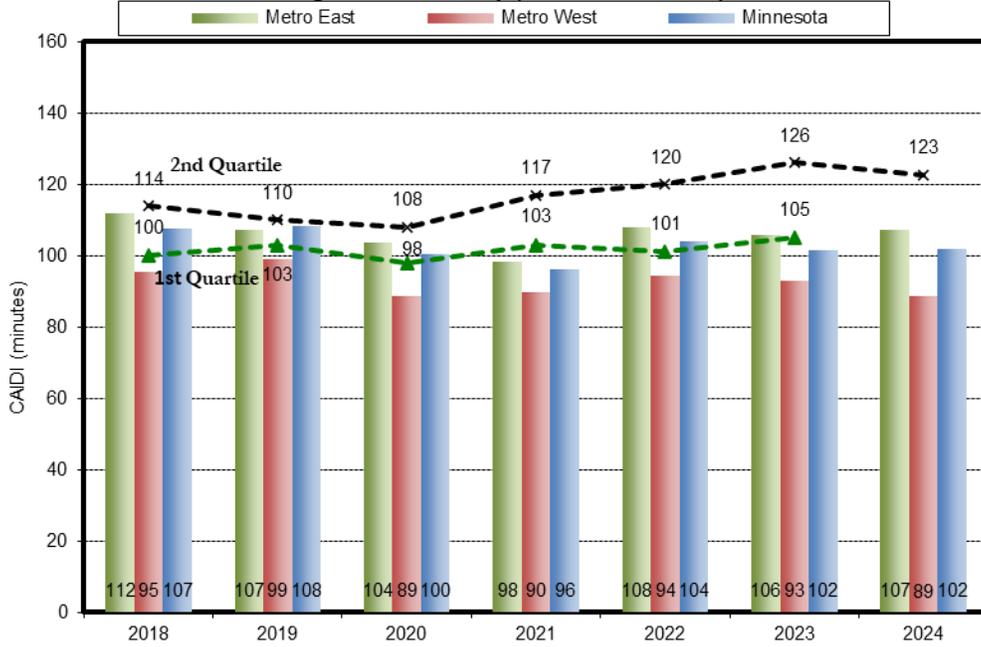


Updated Graph 21

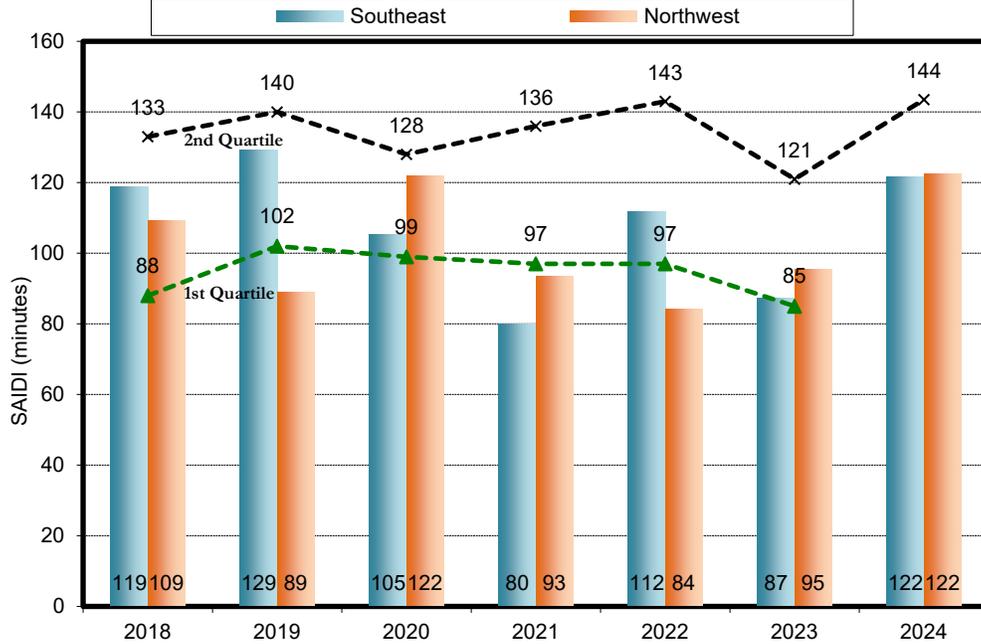
IEEE DRWG Benchmark SAIFI Large Utilities Group (>= 1M Customers)



Updated Graph 22 IEEE DRWG Benchmark CAIDI Large Utilities Group (>=1M Customers)

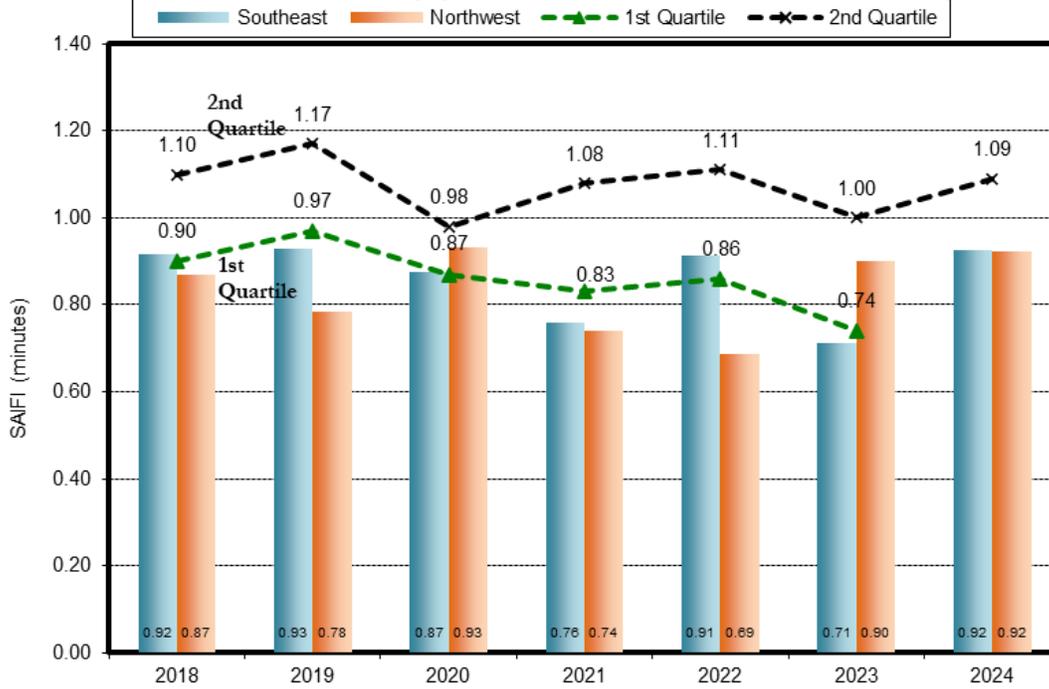


Updated Graph 23 IEEE DRWG Benchmark SAIDI Medium Utilities Group (>100,000 and < 1,000,000 Customers)



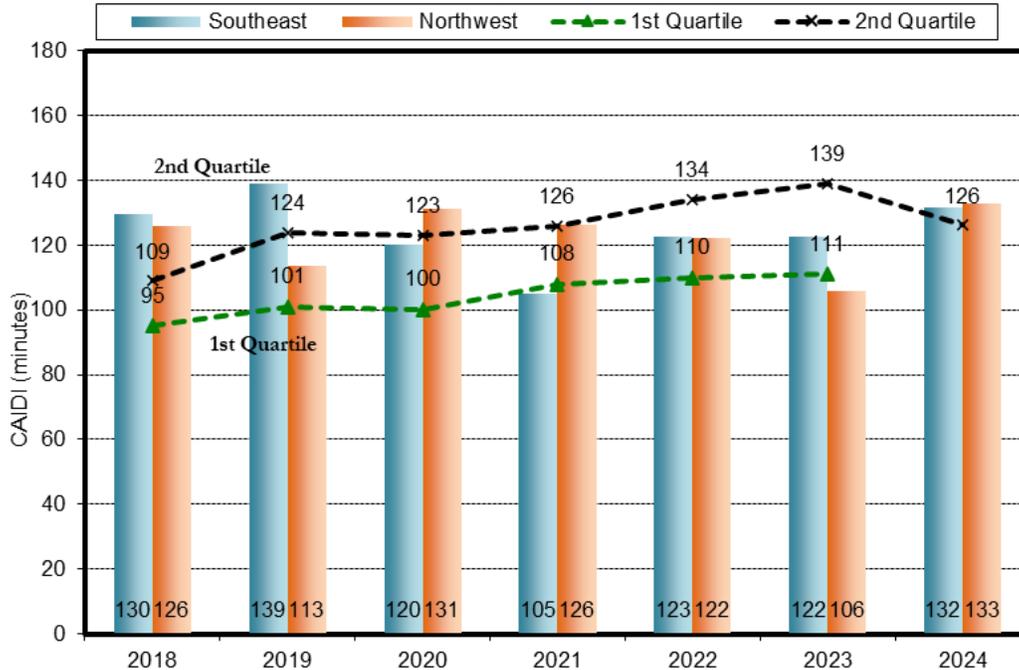
Updated Graph 24 IEEE DRWG Benchmark SAIFI

Medium Utilities Group (>100,000 and < 1,000,000 Customers)



Updated Graph 25 IEEE DRWG Benchmark CAIDI

Medium Utilities Group (>100,000 and < 1,000,000 Customers)



As shown in these graphs, the Company met 8 of the 12 calculated second quartile benchmarks for the work centers.

In 2021, the Company transitioned to utilizing the nationally recognized IEEE DRWG survey to benchmark our performance for the purposes of setting standards for SAIDI, SAIFI, and CAIDI. Applicable IEEE benchmarking results are used to set work center reliability standards for 2024 based on second quartile performance levels. Comparisons are not perfect because each utility, and indeed each work center for the Company, is unique relative to such things as infrastructure, system layout, operating structure, and weather patterns. While recognizing significant differences exist in performance capabilities of various utilities, a better-than-average (i.e., second quartile or better) reliability performance of a utility compared to its peers suggests that the utility is attentive to providing high quality service performance to its customers.

At the same time, we recognize that missing the second quartile benchmarking standard for a given year may not necessarily be indicative of systemic reliability issues in a particular work center. However, tracking of performance over time compared to benchmarking results may highlight possible reliability issues. The Company pays close attention to these results and assesses in detail work center performance and operations where specific standards are not met.

Given the IEEE benchmarking results for 2024, we will continue to use the applicable benchmarking standards for each work center. We support standards at the second quartile of the IEEE benchmark for large utilities for our Metro East and Metro West work centers, and at the second quartile of the IEEE benchmark for medium utilities for our Northwest and Southeast work centers.

A. Alternate Method for Future Years

As explained above, the Company developed an Alternate Method to calculate medium and large utility benchmarks for 2024, in the absence of such benchmarks being provided by IEEE's DRWG. Based on prior experience, we believe this situation may recur in the future: in 2024, the quartile thresholds by utility size breakouts for data year 2023 were not provided until approximately 8 weeks after the initial IEEE DRWG Benchmark Results were released, and in 2025, as of the date of this filing, those utility size breakouts for data year 2024 are still not available.

In the event IEEE's DRWG does not provide medium and large utility breakouts in future years, the Company would propose to continue using the Alternate Method. As outlined in Section I.B, we would propose the following method.

1. Historical Comparison: The Company analyzed historical IEEE DRWG data from 2010 through 2023 to determine the annual differences between:
 - Medium Utility second quartile values and All Participant second quartile values.
 - Large Utility second quartile values and All Participant second quartile values.

This step established a consistent relationship between utility size categories and the broader participant group.

2. Averaging Differences: The annual differences identified in Step 1 were averaged over the 14-year period to derive representative adjustment factors for each utility size category. These factors reflect the typical deviation of Medium and Large utilities from the All Participant benchmark.
3. Benchmark Estimation: The 2024 All Participant second quartile value was used as a baseline. The adjustment factors calculated in Step 2 were applied to this value to estimate the 2024 second quartile benchmarks for:
 - Medium Utilities
 - Large Utilities

This approach ensures continuity and comparability with historical benchmarking practices.

CONCLUSION

We submit this supplemental filing in compliance with Commission order, and we appreciate the opportunity to include this updated information for our Annual Report. We respectfully request that the Commission accept our Annual Report on Safety, Reliability, and Service Quality, as updated by this Supplement. We also continue to request that the Commission approve our proposed reliability standards for 2025 as detailed in our April 1 filing and discussed in this Supplement.

Dated: November 6, 2025

Northern States Power Company

CERTIFICATE OF SERVICE

I, Christine Marquis, 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-25-27

Dated this 6th day of November 2025

/s/

Christine Marquis
Regulatory Administrator

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12	Christopher	Droske	christopher.droske@minneapolismn.gov	Northern States Power Company dba Xcel Energy-Elec		661 5th Ave N Minneapolis MN, 55405 United States	Electronic Service		No	Official 25-27
13	John	Farrell	jfarrell@ilsr.org	Institute for Local Self-Reliance		2720 E. 22nd St Institute for Local Self-Reliance Minneapolis	Electronic Service		No	Official 25-27

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24	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	Official 25-27
25	Kavita	Maini	kmainsi@wi.rr.com	KM Energy Consulting, LLC		961 N Lost Woods Rd Oconomowoc WI, 53066 United States	Electronic Service		No	Official 25-27
26	Christine	Marquis	regulatory.records@xcelenergy.com	Xcel Energy		414 Nicollet Mall	Electronic Service		No	Official 25-27

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27	Erica	McConnell	emcconnell@elpc.org	Environmental Law & Policy Center		35 E. Wacker Drive, Suite 1600 Chicago IL, 60601 United States	Electronic Service		No	Official 25-27
28	Tony	Mendoza	tony.mendoza@sierraclub.org	Sierra Club Environmental Law Program		2101 Webster St. 13th Floor Oakland CA, 94612 United States	Electronic Service		No	Official 25-27
29	Stacy	Miller	stacy.miller@minneapolismn.gov	City of Minneapolis		350 S. 5th Street Room M 301 Minneapolis MN, 55415 United States	Electronic Service		No	Official 25-27
30	David	Moeller	dmoeller@allete.com	Minnesota Power			Electronic Service		No	Official 25-27
31	Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP		33 South Sixth St Ste 4200 Minneapolis MN, 55402 United States	Electronic Service		No	Official 25-27
32	Pouya	Najmaie	najm0001@gmail.com	Cooperative Energy Futures		3416 16th Ave S Minneapolis MN, 55407 United States	Electronic Service		No	Official 25-27
33	Scott	Neal	sneal@edinamn.gov	City of Edina		4801 W 50th St Edina MN, 55424 United States	Electronic Service		No	Official 25-27
34	David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency		220 South Sixth Street Suite 1300 Minneapolis MN, 55402 United States	Electronic Service		No	Official 25-27
35	Carol A.	Overland	overland@legalectric.org	Legalelectric - Overland Law Office		1110 West Avenue Red Wing MN, 55066 United States	Electronic Service		No	Official 25-27
36	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	Official 25-27
37	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	Official 25-27
38	George	Shardlow	george@energycents.org	Energy CENTS Coalition		823 E. 7th Street Saint Paul MN, 55106 United States	Electronic Service		No	Official 25-27
39	Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.		76 W Kellogg Blvd St. Paul MN,	Electronic Service		No	Official 25-27

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41	Lauren	Steinhaeuser	lauren.steinhaeuser@xcelenergy.com	Northern States Power Company dba Xcel Energy		414 Nicollet Mall, 401-08 Minneapolis MN, 55401 United States	Electronic Service		No	Official 25-27
42	Carla	Vita	carla.vita@state.mn.us	MN DEED		Great Northern Building 12th Floor 180 East Fifth Street St. Paul MN, 55101 United States	Electronic Service		No	Official 25-27
43	Joseph	Windler	jwindler@winthrop.com	Winthrop & Weinstine		225 South Sixth Street, Suite 3500 Minneapolis MN, 55402 United States	Electronic Service		No	Official 25-27
44	Kurt	Zimmerman	kwz@ibew160.org	Local Union #160, IBEW		2909 Anthony Ln St Anthony Village MN, 55418-3238 United States	Electronic Service		No	Official 25-27
45	Patrick	Zomer	pat.zomer@lawmoss.com	Moss & Barnett PA		150 S 5th St #1200 Minneapolis MN, 55402 United States	Electronic Service		No	Official 25-27