

September 5, 2025

**PUBLIC DOCUMENT**

Mike Bull  
Interim Executive Secretary  
Minnesota Public Utilities Commission  
121 7th Place East, Suite 350  
St. Paul, Minnesota 55101-2147

RE: **PUBLIC** Comments of the Minnesota Department of Commerce  
Docket No. E002/M-24-432

Dear Mr. Mike Bull:

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

*In the Matter of a Peak Time Rebate Program for Northern States Power  
Co. d/b/a Xcel Energy to Further the Commission's Advanced Rate Design  
Efforts in Docket No. E002/CI-24-115*

A notice of comment was filed by the Commission on July 17, 2025, and a notice of extended comment period was issued on August 12, 2025.

The Department provides recommendations on Xcel Energy's proposed Peak Time Rebate Program and is available to answer any questions the Minnesota Public Utilities Commission may have.

Sincerely,

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

AB/RW/ar  
Attachment



## Before the Minnesota Public Utilities Commission

### PUBLIC Comments of the Minnesota Department of Commerce

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Docket No. E002/M-24-432

#### I. INTRODUCTION

On July 17, 2025, the Minnesota Public Utilities Commission (Commission) issued a Notice of Comment Period in Docket No. E002/M-24-432. The Commission invited stakeholder input on whether the Commission should approve, modify, or reject the proposed Peak Time Rebate (PTR) program filed by Northern States Power Company, d/b/a Xcel Energy (Xcel).

The Department finds that there is insufficient data to determine the benefits of PTR for ratepayers and the grid. The Department recommends that Xcel first implement PTR as a pilot to gather more data and file a proposal for a full program as part of the Company's 2027-2029 Energy Conservation and Optimization (ECO) Triennial Plan.

#### II. PROCEDURAL BACKGROUND

|                   |                                                                                                                                                                                                                   |
|-------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| December 30, 2024 | The Commission delegated the Executive Secretary to "open a docket to evaluate a proposal for a peak-time rebate (PTR) program for Xcel Energy." <sup>1</sup>                                                     |
| January 8, 2025   | The Commission issued a Notice of Docket Opening for Docket No. E002/M-24-432 in accordance with its December 30, 2024, directive. <sup>2</sup>                                                                   |
| March 17, 2025    | Xcel Energy filed a Petition for approval to replace the Company's Energy Action Days program with a PTR program as part of its 2024-2026 Energy Conservation and Optimization (ECO) Triennial Plan. <sup>3</sup> |

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<sup>1</sup> *In the Matter of the Application of Xcel Energy for Authority to Increase Rates for Electric Service in Minnesota, Notice of and Order for Hearing*, December 30, 2024, Docket No. E-002/GR-24-320, (eDockets) [202412-213391-01](#).

<sup>2</sup> *In the Matter of a Peak Time Rebate Program for Northern States Power Co. d/b/a Xcel Energy to Further the Commission's Advanced Rate Design Efforts in Docket No. E002/CI-24-115, Notice of Docket Opening*, January 8, 2025, Docket No. E-002/M-24-432, (eDockets) [20251-213658-01](#).

<sup>3</sup> *In the Matter of a Peak Time Rebate Program for Northern States Power Co. d/b/a Xcel Energy to Further the Commission's Advanced Rate Design Efforts in Docket No. E002/CI-24-115*, Xcel Energy, Initial Filing, March 17, 2025, Docket No. E-002/M-24-432, (eDockets) [20253-216468-01](#), (hereinafter, Xcel Petition).

Analysts assigned: Andy Bahn, Rachel Wiedewitsch

July 17, 2025

The Commission issued a Notice of Comment Period seeking input on whether the Commission should approve, modify, or reject Xcel Energy's proposed PTR program.<sup>4</sup>

Topic(s) open for comment:

*Merits of the Proposal*

1. Is Xcel's proposed PTR program design reasonable and in the public interest?
2. Are Xcel's proposed eligibility rules reasonable, including the proposal to exclude current demand response program participants?
3. Is the Company's proposed budget reasonable, including third-party vendor expenses?
4. Is the Company's proposed customer outreach and communications plan reasonable?
5. Is the Company's cost-effectiveness assessment reasonable?
6. Should the Commission consider recent increases in the Midcontinent Independent System Operator (MISO) capacity auction clearing prices when assessing the cost-effectiveness assessment?
7. Should the Commission require any modifications to the program to increase the scale and/or equity of system benefits that can be delivered?
8. Are there program design, implementation, and evaluation elements that have proven successful in similar programs, such as Connexus's Peak Time Rebate program, that the Commission should direct Xcel to incorporate

*Program Evaluation*

9. What reporting should the Commission require the Company to provide, and on what cadence?
10. Should the Commission require an assessment of the program's performance and scaling opportunities after a certain duration?

*Cost Recovery*

11. What method of cost recovery is allowable and appropriate for program costs, if approved? For example, should the Commission authorize the Company to seek future cost recovery through Xcel's ECO Portfolio, or direct the Company to use an alternate cost recovery method?

*Guidance*

12. Is there direction the Commission could provide to Xcel regarding other programs, whether existing or future, that may qualify for ECO and require substantive Commission review and/or tariff?

*Other*

13. Are there other issues or concerns related to this matter?

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<sup>4</sup> In the Matter of a Peak Time Rebate Program for Northern States Power Co. d/b/a Xcel Energy to Further the Commission's Advanced Rate Design Efforts in Docket No. E002/CI-24-115, Notice of Comment Period, July 17 2025, Docket No. E-002/M-24-432, (eDockets) [20257-221115-01](#).

### III. DEPARTMENT ANALYSIS

#### A. BACKGROUND

Xcel Energy has operated a behavioral demand response program called Energy Action Days (EAD) since 2022, and the program is currently under the Company's 2024-2026 Energy Conservation and Optimization (ECO) Triennial Program. Through EAD, Xcel sends event notifications to participants to encourage them to reduce energy consumption during peak hours. Participation is entirely voluntary, and there are no rebates for participation or penalties for non-participation. There are currently approximately 550,000 customers enrolled in Energy Action Days.<sup>5</sup>

In Xcel Energy's March 17, 2025, filing, the Company proposes to replace the EAD program with a Peak Time Rebate (PTR) program, as a modification to the 2024-2026 ECO Triennial Plan.<sup>6</sup> Like EAD, the PTR program would encourage customers to reduce load during peak hours during three to five events per year. However, PTR participants would earn a rebate of \$1/kWh for their load reduction.<sup>7</sup> Xcel proposes to implement the PTR program on an opt-in basis (meaning that customers would have to sign up to join the program), and any customers who have an AMI meter and allow the Company to contact them via email and/or text are eligible for PTR, except for net metering customers and those already participating in another demand response program (such as AC Reward or Saver's Switch).<sup>8</sup> Xcel plans to initially target EAD participants who are not enrolled in other demand response programs and expects to enroll approximately 15,500 customers in the first year of PTR.<sup>9</sup>

Xcel estimates the annual budget for the program at approximately \$1.1 million, with a cost breakdown as follows:<sup>10</sup>

**Table 1. PTR 2026 Budget**

| Budget Category     | 2026 Expenses |
|---------------------|---------------|
| Vendor              | \$800,000     |
| Rebates             | \$187,500     |
| Technology Services | \$50,000      |
| Administration      | \$80,000      |
| Marketing           | \$20,000      |
| Total               | \$1,137,500   |

The Company expects the average peak savings per customer to be 0.63 kW, or 2.5 kWh over a 4-hour event. The benefit-cost ratio for the program during its first year is 1.01 using the Minnesota Test and 0.98 using the Ratepayer Impact Measure.<sup>11</sup>

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<sup>5</sup> Xcel Petition, at 5.

<sup>6</sup> *Ibid.*

<sup>7</sup> *Id.*, at 9.

<sup>8</sup> *Id.*, at 10.

<sup>9</sup> *Id.*, at 12.

<sup>10</sup> *Id.*, at 14.

<sup>11</sup> *Id.*, at 15-16.

Xcel states that it will conduct a program evaluation after establishing sufficient participation and will provide those results as part of future ECO Status Reports. The Company will also provide plans for program expansion in the 2027-2029 ECO Triennial Plan.<sup>12</sup>

**B. QUESTIONS TO BE ANSWERED**

**B.1. *Is Xcel's proposed PTR program design reasonable and in the public interest?***

While Xcel's proposal presents a first step in exploring the long-term benefits of PTR to ratepayers and the grid, there is not enough information to determine at this time whether the PTR program would be in the public interest. First, the program barely passed a benefit-cost analysis (BCA) using the Minnesota Test, with a benefit-cost ratio of 1.01, while the Ratepayer Impact Measure test shows that the program would result in a small increase in rates for ratepayers, with a benefit-cost ratio of 0.98. Some assumptions, such as the average load reduction per customer, can dramatically change the results of the BCA. If load reductions under the program are lower than the 0.63 kW assumed, the benefits of the program will be lower (discussed more in Section B.5 below). On the other hand, the BCA provided in Xcel's petition is only for the first year of the program. Using Xcel's assumptions, increased enrollment in future years can be expected to enhance the benefits that the program can deliver. There may also be slight decrease in costs due to one-time technology costs (approximately 4 percent of the 2026 budget) that will no longer be necessary after the first year of the program.<sup>13</sup>

An opt-out program would help maximize the benefits of PTR. In Xcel's stakeholder engagement presentation, the Company notes that "an opt-out structure would maximize program size and avoid recruitment costs and time."<sup>14</sup> While the load reduction per customer may be lower under an opt-out program, the opt-out structure can cast a wider net and enroll significantly higher numbers of customers, potentially leading to greater aggregate load reductions. For example, Portland General Electric's Residential Pricing Pilot tested both the opt-in and opt-out approaches for PTR, finding that the opt-out program captured customers who would neither opt in nor opt out of a program if given the choice. The program evaluation estimated that 92 percent of participants in the opt-out program were such "complacent customers," and these customers reduced load by 6 percent during PTR events, compared to between 17 to 21 percent from opt-in customers.<sup>15</sup> At these load reduction levels, if the opt-out program enrolls four times as many customers as the opt-in program, the opt-out program would deliver greater aggregate load savings, assuming all else equal. Nevertheless, Xcel did not propose an opt-out program, which the Company claims is "inconsistent with peer programs and likely not cost effective" because such a program would require a "sizeable investment" in the Company's billing system.<sup>16</sup> However, Xcel provides no specifics regarding the number of participants that would trigger the need for these billing system upgrades or the potential costs of those

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<sup>12</sup> Xcel Petition, at 16.

<sup>13</sup> DOC IR 9.

<sup>14</sup> Xcel Petition, Attachment C, at 11.

<sup>15</sup> Cadmus. 2018. Flex Pricing and Behavioral Demand Response Pilot Program, at 9-10.

<https://edocs.puc.state.or.us/efdocs/HAH/um1708hah16432.pdf>

<sup>16</sup> Xcel Petition, at 11.

upgrades.<sup>17</sup> This information is necessary to assess whether an opt-out program would be beneficial to ratepayers.

Additionally, it remains unclear whether and how the capacity benefits of the program will be realized. According to Xcel's BCA, generation capacity accounts for 97% of the program's benefits under the Minnesota Test and 98% under the Ratepayer Impact Measure.<sup>18</sup> For ratepayers to realize these benefits, Xcel must either be able to 1) bid PTR load reductions into the MISO capacity market, or 2) use PTR load reductions to lower the Company's load forecast and capacity obligations with MISO. However, both avenues appear to be infeasible at this time. First, Xcel states that it does not plan to bid the program into MISO, citing challenges posed by the unpredictability of load reductions under behavioral demand response programs like PTR, as well as changing MISO market rules for demand-side resources.<sup>19</sup> The Department believes this approach is reasonable for the pilot phase, but should be revisited in the future once MISO market reforms for demand-side resources have concluded. Utilities in other states have bid their PTR programs into the capacity market. For example, ComEd bids its Peak Time Savings program as a Demand Response Resource in PJM's capacity markets to fund bill credits for program participants.<sup>20</sup> Similarly, Baltimore Gas & Electric's PTR program is also monetized in PJM.<sup>21</sup>

Second, MISO rules appear to preclude using load reductions from demand-side resources (other than energy efficiency) to reduce load serving entities' load forecasts.<sup>22</sup> Specifically, MISO's Resource Adequacy tariff states that load serving entities' Coincident Peak Demand forecasts, which are used to determine their capacity obligations, must be "augmented to include the normal Demand from forecasted demand resources, whether registered or not registered with the Transmission Provider, including Demand from any retail demand side management programs."<sup>23</sup> Xcel has not explained whether or how PTR load reductions will be used to lower the Company's peak demand forecast and capacity obligations with MISO, and whether this would be consistent with MISO rules.

If planning entities like MISO do not rely on PTR to reduce load during peak times, even *if* PTR participants reduce load during events, PTR load reductions will not help meet Xcel's capacity obligations and will not result in reductions in the Company's capacity costs. In other words, PTR will not influence capacity requirements if expected load reductions are not planned for and relied upon as

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<sup>17</sup> See DOC IR 4.

<sup>18</sup> Using data from Xcel Petition, Attachment D.

<sup>19</sup> DOC IR 7; DOC IR 21.

<sup>20</sup> Resource Innovations. 2024. Commonwealth Edison Company's Peak Time Savings Program Annual Report, p. 27. <https://icc.illinois.gov/docket/P2012-0484/documents/354730/files/621367.pdf>

<sup>21</sup> Baltimore Gas & Electric. Rider 26 – Peak Time Rebate. [https://assets.contentstack.com/v3/assets/blt71bfe6e8a1c2d265/bltbc53d4782e3ba22/Rdrs\\_26\\_27.pdf](https://assets.contentstack.com/v3/assets/blt71bfe6e8a1c2d265/bltbc53d4782e3ba22/Rdrs_26_27.pdf).

<sup>22</sup> MISO rules define an Energy Efficiency Resource as "an end-use customer project... exceeding then-current building codes, appliance standards, or other relevant standards, designed to achieve a continuous reduction in electric energy consumption during On Peak daylight hours". PTR only reduces load during a few days each year and does not provide "a continuous reduction in electric energy consumption during On Peak daylight hours."

See MISO. 2024. FERC Electric Tariff, Module E-1, Resource Adequacy, at 61. [https://docs.misoenergy.org/miso12-legalcontent/Module\\_E-1\\_-\\_Resource\\_Adequacy.pdf](https://docs.misoenergy.org/miso12-legalcontent/Module_E-1_-_Resource_Adequacy.pdf)

<sup>23</sup> MISO. 2024. FERC Electric Tariff, Module E-1, Resource Adequacy, at 22. [https://docs.misoenergy.org/miso12-legalcontent/Module\\_E-1\\_-\\_Resource\\_Adequacy.pdf](https://docs.misoenergy.org/miso12-legalcontent/Module_E-1_-_Resource_Adequacy.pdf)

Analysts assigned: Andy Bahn, Rachel Wiedewitsch

a capacity resource by the system operator or if load reductions are not incorporated in Xcel's load forecast to reduce its capacity obligation.

Given this uncertainty, the focus of the initial implementation of the PTR should be on gathering the necessary data to inform future program design, particularly the potential for an opt-out program that is MISO-integrated. The Department recommends that PTR be first implemented as a pilot to collect data to help determine whether PTR should be implemented as an opt-in or opt-out program in the long term. In particular, the pilot should be designed to test customer acceptance and load reductions under both opt-in and opt-out enrollment approaches. In addition to Xcel's existing plans to invite current EAD participants to opt in to PTR, the Company should also auto-enroll some of these customers in PTR. For example, the Company could auto-enroll 7,750 customers, which is equivalent to half of the expected PTR enrollment, and allow opt-in customers to fill up the rest of the program. The Company should then collect data on customer acceptance and load reductions from each group separately to enable a comparison between opt-in and opt-out customers, similar to Portland General Electric's pilot described above.

Upon completion of the PTR Pilot, the Company should file a proposal in ECO for a full PTR program based on the results of the pilot. The proposal should include BCAs for both an opt-in and an opt-out program using enrollment and load reduction data from the pilot, and Xcel should provide justification for its recommended approach for the program. The BCA for the opt-out program should include the costs for any necessary billing system upgrades.

The Department recommends that the PTR pilot be implemented in parallel with the existing EAD program, with customers allowed to enroll in either PTR or EAD. As the Company gains more experience with and information from PTR, the program could be expanded to replace EAD in the future. However, EAD should not be discontinued at this time, in case PTR is determined to be not cost-effective after the initial pilot.

*B.2. Are Xcel's proposed eligibility rules reasonable, including the proposal to exclude current demand response program participants?*

The Department believes it is reasonable to exclude customers currently enrolled in other demand response programs, such as AC Rewards and Saver's Switch. These restrictions ensure that customers do not receive duplicative incentives from different programs for the same load reduction. The Department's interpretation of these eligibility requirements is that they would not exclude current demand response customers from switching programs—for example, from AC Rewards to PTR. Similarly, the Department also recommends that customers be allowed to enroll in either the PTR pilot or EAD, as discussed above.

It is also reasonable to exclude net metering customers at this time, since baseline and load reduction measurements for these customers would be complicated by distributed generation. Specifically, it would be difficult to determine whether load reductions are a result of the customer's behavior or of higher solar production than usual. However, the Company should consider net metering customers as a potential future addition to the program. Some PTR programs offered by other utilities around the

country do allow net metering customers to participate, and load reductions from these customers would provide benefits to ratepayers.<sup>24</sup>

*B.3. Is the Company’s proposed budget reasonable, including third-party vendor expenses?*

Since the RFP to select a vendor for PTR is ongoing, Xcel’s program cost estimates are based on the EAD program.<sup>25</sup> Third-party vendor expenditures comprise 70 percent of the budget, compared to 16 percent for rebates to customers.<sup>26</sup> The Department believes this is a reasonable approach until PTR-specific costs are identified through the RFP. Since vendor and administration costs do not grow in line with increased enrollment, the Department expects that these costs will account for a smaller share of total program costs in subsequent years.<sup>27</sup>

*B.4. Is the Company’s proposed customer outreach and communications plan reasonable?*

The Department agrees that targeting current EAD participants is a reasonable approach for the early stages of PTR implementation, given that the Company already has these customers’ contact information. As discussed above, the Department recommends that Xcel also auto-enroll a subset of these customers in PTR, in addition to inviting customers to opt in as proposed by the Company.

*B.5. Is the Company’s cost-effectiveness assessment reasonable?*

The Company’s cost-effectiveness analysis utilizes a standard methodology approved by the Commission to assess the relationship between benefits and costs of the proposed PTR program. However, the BCA results are speculative and should be treated as such. The primary issue, as discussed above, is that the generation capacity benefits claimed by Xcel, which account for almost all of the program’s benefits, are unlikely to result in realized savings for ratepayers without Xcel bidding PTR load reductions into the MISO capacity market or using PTR to reduce the Company’s load forecast.

Aside from the uncertainty around capacity benefits, enrollment figures and customer peak load reduction estimates are key assumptions driving the estimated benefits of the program that may differ from actuals during program implementation. Notably, Xcel’s peak load reduction estimate of 0.63 kW per customer is substantially higher than the load reductions observed under any other PTR programs the Department reviewed.

**Table 2. Average load reduction per customer under PTR programs**

| Program | Average Load Reduction per Customer (kW) |
|---------|------------------------------------------|
|---------|------------------------------------------|

<sup>24</sup> See Xcel Petition, Attachment B. The Power Saver Rewards program offered by California utilities (PG&E, SDG&E, and SCE) explicitly allows solar customers to participate, while other programs do not specify exclusion of net metering customers.

<sup>25</sup> Xcel Petition, at 14.

<sup>26</sup> Xcel Petition, at 14, Table 1.

<sup>27</sup> DOC IR 9.

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|                                                            |                                          |
|------------------------------------------------------------|------------------------------------------|
| Commonwealth Edison – Peak Time Savings <sup>28</sup>      | 0.04 (2023)<br>0.11 (2022)               |
| Consumers Energy – Peak Time Rewards <sup>29</sup>         | 0.24                                     |
| Portland General Electric – Peak Time Rebate <sup>30</sup> | 0.13-0.22 (winter)<br>0.39-0.41 (summer) |
| Baltimore Gas & Electric – Peak Time Rebate <sup>31</sup>  | 0.15                                     |

Since the benefits of PTR, particularly generation capacity, scale directly with customers' peak load reduction under the program, lower load reductions will also decrease the benefits of the program accordingly. An adjustment of the load reduction estimates to be more in line with the programs listed above would result in the program no longer passing the Minnesota Test.

Furthermore, although emissions benefits only account for a small portion of the total benefits of the program, these benefits also appear to be overstated. Xcel's BCA only examines load reductions during an event, but does not consider potential load shifting from customers that may result in increased load during other hours.<sup>32</sup> For example, some customers may pre-cool their homes and then turn up their thermostat after the event, potentially increasing load right before and after the event hours. Incorporating the effects of load shifting significantly impacts estimates of environmental benefits. The effect of load shifting on emissions can be seen through examination of hourly carbon intensity around peak load hours. Since 2020, peak load occurred from June to August between 4 and 6 pm.<sup>33</sup> The figures below use hourly emissions intensity data from 2024 (the only full year available) to examine emissions intensities around peak hours during July, and around the actual peak that year, which occurred on August 26<sup>th</sup>.

**[TRADE SECRET DATA HAS BEEN EXCISED]**

**[TRADE SECRET DATA HAS BEEN EXCISED]**

The figures show that if a PTR event had occurred in July 2024 and a customer shifted their load to just after the event window, emissions would have likely *increased*. During the actual peak **[TRADE SECRET DATA HAS BEEN EXCISED]** there would have been a slight emissions reduction if a customer shifted load to after the event, but nowhere near an estimate that assumes all load is curtailed permanently in the peak load hour(s).

<sup>28</sup> Resource Innovations. 2024. Commonwealth Edison Company's Peak Time Savings Program Annual Report, at 26. <https://icc.illinois.gov/docket/P2012-0484/documents/354730/files/621367.pdf>

<sup>29</sup> Cadmus. 2021. Dynamic Peak Pricing Annual Evaluation Report – 2020 Program Year, at 11, Table 7. <https://mi-psc.my.site.com/sfc/servlet.shepherd/version/download/068t000000OpNv6AAF>

<sup>30</sup> Cadmus. 2018. Flex Pricing and Behavioral Demand Response Pilot Program, at 39, Table 14. <https://edocs.puc.state.or.us/efdocs/HAH/um1708hah16432.pdf>

<sup>31</sup> Using data from BGE Response to OPC Data Request 1-11, filed August 25, 2025, in Maryland Public Service Commission Case No. 9761.

<sup>32</sup> Xcel Petition, Attachment D.

<sup>33</sup> DOC-024-PUBLIC.

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Even though PTR may provide lower benefits than estimated in Xcel's BCA, the Department believes the program has potential to deliver much greater benefits in the future, particularly under an opt-out structure. When Xcel files its proposal for a full PTR program, a refined BCA with updated assumptions based on actual data collected during the pilot will assist the Commission with a more robust evaluation of the benefits and costs of PTR.

*B.6. Should the Commission consider recent increases in the Midcontinent Independent System Operator (MISO) capacity auction clearing prices when assessing the cost-effectiveness assessment?*

To calculate generation capacity benefits under the BCA, Xcel used the MISO Cost of New Entry (CONE) for 2023/2024, which is \$104.17/kW-year.<sup>34</sup> For comparison, MISO's most recent Planning Resource Auction resulted in a clearing price for summer 2025 capacity of \$666.50/MW-day, which is equivalent to \$243.27/kW-year.<sup>35</sup> This figure is higher than Xcel's BCA assumption and is much higher than summer capacity prices in previous years. It is uncertain whether capacity prices for summer 2026 (when PTR will be in place) will continue at the same elevated level or not.<sup>36</sup>

However, the Department does not believe it is necessary to consider the increase in MISO capacity costs, given that this point is moot if Xcel does not bid PTR load reductions into MISO or use PTR load reductions to decrease the Company's capacity obligations. Without registering PTR with MISO or reducing Xcel's capacity obligations, any load reductions under the program in 2026 will not deliver any generation capacity cost savings to ratepayers. When Xcel files its proposal for a full PTR program after the pilot period, as recommended above, the Company will have additional data from future Planning Resource Auctions to inform its BCA calculations as well as more clarity on whether PTR load reductions can be bid into MISO or used to reduce Xcel's capacity obligation.

*B.7. Should the Commission require any modifications to the program to increase the scale and/or equity of system benefits that can be delivered?*

Since the system benefits of peak load reductions, if realized through MISO processes, accrue to all ratepayers rather than to localized areas, the Department does not believe there are program modifications that can increase the equity of those system benefits. Since electric rates are regressive, with electricity bills comprising a greater share of household expenses for low-income customers, any downward pressure on rates resulting from avoided capacity costs would benefit low-income households more than higher-income households.<sup>37</sup>

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<sup>34</sup> DOC IR 12; Xcel's January 29, 2024, Compliance Filing, CIP-23-92, Appendix 1, at 518.

<https://www.edockets.state.mn.us/documents/%7B70D55A8D-0000-CF23-95CF-EA8B427927FD%7D/download?contentSequence=0&rowIndex=67>

<sup>35</sup> MISO. 2025. MISO's Planning Resource Auction indicates sufficient resources. <https://www.misoenergy.org/meet-miso/media-center/2025---news-releases/misos-planning-resource-auction-indicates-sufficient-resources/>

<sup>36</sup> MISO. 2024. Planning Resource Auction Results for Planning Year 2024-2026, at 25. <https://cdn.misoenergy.org/2024%20PRA%20Results%20Posting%2020240425632665.pdf>

<sup>37</sup> Low-income and African American households experience higher energy burdens (the percentage of income spent on energy) than other households. See:

RMI. 2023. 1 in 7 Families Live in Energy Poverty. States Can Ease That Burden. <https://rmi.org/1-in-7-families-live-in-energy-poverty-states-can-ease-that-burden/>

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To increase the scale of system benefits delivered by PTR, the Commission should direct Xcel to explore an opt-out structure in parallel with opt-in enrollment for the pilot, as recommended above, and consider an opt-out program for future program implementation. Additionally, Xcel should target customers with high peak load for enrollment in PTR. For ComEd's PTR program in Illinois, the utility conducted targeted marketing at customers whose peak load contribution (PLC) were in the top quartile of all customers, and found that high PLC participants had significantly greater load reductions during PTR events than non-high PLC participants (0.23 kW compared to 0.14 kW).<sup>38</sup> The Commission should require Xcel to follow the same approach for its PTR pilot and collect data on these customers to inform future program implementation.

Aside from system benefits, PTR can also deliver benefits to program participants by providing them with the opportunity to reduce their electric bills by reducing load during PTR events. Since under PTR customers can only earn rewards for reducing load, rather than being penalized for not reducing load, Xcel should target low-income households and communities to ensure that these customers can benefit directly from participating in the program, including through outreach and market as well as auto-enrollment.

*B.8. Are there program design, implementation, and evaluation elements that have proven successful in similar programs, such as Connexus's Peak Time Rebate program, that the Commission should direct Xcel to incorporate?*

The Department discussed program design, implementation, and evaluation elements from other PTR programs in responses to previous questions.

*B.9. What reporting should the Commission require the Company to provide, and on what cadence?*

Xcel plans to track and report participants, rebates paid, and energy saved as part of the annual status report for its ECO plan.<sup>39</sup> Since PTR would be part of the Company's ECO portfolio, the Department agrees that PTR should be part of the annual ECO status report. To ensure that the PTR pilot provides useful data to inform future program design and implementation, the Department recommends additional reporting requirements for PTR, consistent with the discussion above:

- Enrollment rates for opt-in customers
- Participation, rebates paid, and peak load reduction for opt-in and opt-out customers
- Customer acquisition costs for opt-in and opt-out customers
- Customer satisfaction for opt-in and opt-out customers
- Participation, rebates paid, and peak load reduction for high PLC customers and non-high PLC customers

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George C. Homsy & Ki Eun Kang. 2025. Energy burden: Exploring the intersection of race, income, and community characteristics across the United States. Energy Research & Social Science, Volume 127.

<https://www.sciencedirect.com/science/article/abs/pii/S2214629625002889>

<sup>38</sup> Resource Innovations. 2024. Commonwealth Edison Company's Peak Time Savings Program Annual Report, at 40.

<https://icc.illinois.gov/docket/P2012-0484/documents/354730/files/621367.pdf>

<sup>39</sup> DOC IR 3.

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- Participation, rebates paid, and peak load reduction for low-income customers and non-low-income customers
- Timing of PTR events compared to timing of actual system peaks.

*B.10. Should the Commission require an assessment of the program's performance and scaling opportunities after a certain duration?*

Yes. As discussed above, the Commission should require Xcel to file a proposal for full PTR program implementation as part of the Company's ECO portfolio, using data from the pilot. The proposal should specify how Xcel will utilize PTR load reductions to reduce capacity costs and include BCAs for both an opt-in and an opt-out program.

*B.11. What method of cost recovery is allowable and appropriate for program costs, if approved? For example, should the Commission authorize the Company to seek future cost recovery through Xcel's ECO Portfolio, or direct the Company to use an alternate cost recovery method?*

Cost recovery for PTR should be through the Company's ECO portfolio. Minn. Stat. § 216B.241, subd. 13(a) provides enabling language for load management programs to be included in the ECO portfolio.<sup>40</sup> The PTR program meets the statutory definition for load management under § 216B.2402, subd. 15, which defines load management as "an activity, service, or technology that changes the timing or the efficiency of a customer's use of energy that allows a utility or a customer to: (1) respond to local and regional energy system conditions; or (2) reduce peak demand for electricity or natural gas."<sup>41</sup>

Including PTR in ECO would put the program under the same regulatory umbrella as Xcel's other load management programs. The ECO framework also includes annual reporting requirements that provides for regular review by the Department and stakeholders, as well as provides predictable cost recovery for Xcel.

*B.12. Is there direction the Commission could provide to Xcel regarding other programs, whether existing or future, that may qualify for ECO and require substantive Commission review and/or tariff?*

Under Minnesota statute, tariff or rate changes are the Commission's jurisdiction.<sup>42</sup> Therefore, if the utility reasonably anticipates that the proposal will result in a tariff or rate change, then the petition will have to go to the Commission for approval either before or after ECO review. The Commission should instruct Xcel to seek any necessary Commission approval prior to filing proposals under ECO.

*B.13. Are there other issues or concerns related to this matter?*

The Department has no other issues or concerns related to this matter at this time.

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<sup>40</sup> [Minn. Stat. § 216B.241.](#)

<sup>41</sup> [Minn. Stat. § 216B.2402.](#)

<sup>42</sup> [Minn. Stat. § 216B.16.](#)

#### IV. DEPARTMENT RECOMMENDATIONS

Based on analysis of Xcel's PTR proposal, the Department has prepared recommendations, which are provided below. The recommendations correspond to the subheadings of Section III above.

##### *B. QUESTIONS TO BE ANSWERED*

- B.1. The Department recommends that PTR be implemented as a pilot, in parallel with EAD. The pilot should pursue both opt-in and opt-out approaches to customer enrollment and collect data on opt-in and opt-out customers separately.
- B.1. The Department recommends that Xcel include a proposal for a full PTR program as part of the Company's ECO portfolio upon completion of the pilot. The proposal should:
  - Include BCAs for both an opt-in and opt-out program, informed by the data collected as part of the pilot
  - Include the costs of necessary billing system upgrades to support an opt-out program
  - Specify how Xcel will bid PTR load reductions into MISO markets or reduce the Company's capacity obligations.
- B.6. The Department recommends that Xcel utilize updated capacity prices as part of its full PTR program proposal.
- B.7. The Department recommends that Xcel target low-income customers and customers with high peak load contribution for program enrollment.
- B.9. The Department recommends that reporting for PTR be part of the Company's annual ECO status reports and that Xcel collect the following additional information from the PTR pilot to inform future program design and implementation:
  - Enrollment rates for opt-in customers
  - Participation, rebates paid, and peak load reduction for opt-in and opt-out customers
  - Customer acquisition costs for opt-in and opt-out customers
  - Customer satisfaction for opt-in and opt-out customers
  - Participation, rebates paid, and peak load reduction for high PLC customers and non-high PLC customers
  - Participation, rebates paid, and peak load reduction for low-income customers and non-low-income customers
  - Timing of PTR events compared to timing of actual system peaks.
- B.11. The Department recommends that PTR costs be recovered through Xcel's ECO portfolio.
- B.12. The Department recommends that the Commission instruct Xcel to seek Commission approval for proposals that will result in a tariff or rate change prior to filing proposals under ECO.

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Xcel Energy Information Request No. 3  
Docket No.: E002/M-24-432  
Response To: Minnesota Department of Commerce  
Requestor: Peter Teigland, Andy Bahn, Rachel Wiedewitsch  
Date Received: July 28, 2025

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Question:

Topic: Xcel's proposed PTR program

Reference(s): PTR Program Petition

What metrics will Xcel track to help assess the success of the program?

Response:

The Company proposed to include the PTR program as part of our Energy Conservation and Optimization (ECO) plan. As part of our ECO portfolio, we anticipate tracking participants, rebates paid, and energy saved as part of the annual status report filed on April 1 of each year. Our 2024 Annual Status Report was filed in Docket G,E002/CIP-23-92.

---

Preparer: Kris Kohls  
Title: Regulatory Policy Specialist  
Department: Customer Energy & Transportation Solutions  
Telephone: 612-216-8124  
Date: August 8, 2025

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

Xcel Energy

Information Request No.

4

Docket No.: E002/M-24-432

Response To: Minnesota Department of Commerce

Requestor: Peter Teigland, Andy Bahn, Rachel Wiedewitsch

Date Received: July 28, 2025

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Question:

Topic: Xcel's proposed PTR program

Reference(s): PTR Program Petition

Refer to Xcel's PTR Application, p. 11, which states "The Company considered an opt-out approach for the PTR program, specifically starting with eligible customers currently enrolled in Energy Action Days. However, it was determined that this approach was inconsistent with peer programs and likely not cost effective. Given the volume of customers eligible for rebates, a multi-year project with a sizeable investment in our billing system would be required to support the same number of participants as Energy Action Days. The Company proposes assessing results from an established opt-in program prior to initiating an investment on that scale."

- a. How many PTR participants can Xcel accommodate before investments in the billing system become necessary?
- b. Did the Company evaluate the cost effectiveness of an opt-out approach? If yes, please provide these results in separate workpapers. If not, then please explain why not.
- c. Concerning the cost effectiveness of an opt-out approach, given the need for upfront investment in a new billing system presumably affecting initial cost-effectiveness results, could the opt-out program become cost effective over a long enough time horizon? Please explain.
- d. Is the Company aware of any peer programs that do utilize an opt-out approach? If so, has the Company evaluated the viability of this approach for its own customers?
- e. Has the relatively low response rate to Energy Action Days influenced the Company's decision not to pursue an opt-out approach for the proposed PTR program? If so, then please explain to what extent and how the Company has evaluated other potential design issues with EAD (e.g, the lack of incentive payments) that might be affecting the overall response rate.
- f. Please describe specifically how the Company plans to assess the results from its proposed opt-in program to determine whether to deploy PTR on an opt-

out basis. When would this determination be made and what would the decision criteria be?

Response:

- a. There isn't a specific threshold our system can accommodate. The current process to apply rebates to a customer's bill is manual and time intensive, which increases the potential for errors and inefficiencies. With growing PTR enrollments, the demand on processing resources will rise, further elevating the risk of inaccuracies and delays.
- b. No, the Company did not evaluate the cost effectiveness of an opt-out approach given the cost necessary to modify our billing system and manage opt-out customer engagement. It was also apparent from our research that opt-out scenarios were not typically utilized in the industry as shown in Attachment B of our Petition filed in the above referenced docket on March 17, 2025.
- c. See response to subpart b.
- d. As noted in Attachment B of our Petition filed on March 17, 2025, only a few peer programs utilize an opt-out approach. The Company selected an opt-in model, which aligns with most of the peer utility programs and reflects common industry practice. Additionally, as noted in the Petition, the Company did evaluate the viability of an opt-out approach and determined it is not feasible to implement in our current billing system.
- e. No, the Energy Action Days (EAD) response rate was not considered in planning this program design.
- f. The primary factor in determining whether the Company can implement PTR on an opt-out basis will be the feasibility of doing so within our billing system. Until such functionality becomes technically viable, an out-out approach remains impractical.

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|             |                                            |
|-------------|--------------------------------------------|
| Preparer:   | Kris Kohls                                 |
| Title:      | Regulatory Policy Specialist               |
| Department: | Customer Energy & Transportation Solutions |
| Telephone:  | 612-216-8124                               |
| Date:       | August 8, 2025                             |

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Xcel Energy

Information Request No.

7

Docket No.: E002/M-24-432

Response To: Minnesota Department of Commerce

Requestor: Peter Teigland, Andy Bahn, Rachel Wiedewitsch

Date Received: July 28, 2025

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Question:

Topic: Xcel's proposed PTR program

Reference(s): PTR Program Petition

Refer to Xcel's PTR Application, p. 13, which states "PTR will not be registered with MISO."

- a. Please explain why Xcel will not bid the load reductions from PTR into MISO markets.
- b. Does Xcel plan to register PTR with MISO and bid PTR load reductions into MISO markets in the future? Explain why or why not.

Response:

PTR is a behavioral demand response (BDR) program that has the following characteristics:

1. **Voluntary participation:** The programs are dependent upon individuals choosing to respond.
2. **Inconsistent Behavior:** Customers will respond widely based on time of day, weather, personal schedules and awareness of an event.
3. **Limited Impact:** Behavioral change often results in small incremental reduction in energy use.
4. **Measurement challenges:** It can be difficult to measure and verify the impact of behavioral programs, and these measurements need to be tested overtime within a program.

As a result, these reductions are significantly variable and need to be tested over time.

- a. Given the characteristics listed above, the Company's current BDR program, Energy Action Days, is not bid into MISO. Additionally, MISO is in the process of adjusting their future requirements for demand response resources. As part of these changes, there will be specific requirements put in place to

deploy resources faster and creating significant penalties for missing load requirements. These changes are not conducive to BDR programs being developed or piloted. Without reliability, there is a significant risk of being penalized.

- b. Without several years of measurement and verification on BDR programs, it is unknown whether the Company will choose to utilize this as a future MISO resource.

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|             |                                   |
|-------------|-----------------------------------|
| Preparer:   | Annie Dellva                      |
| Title:      | Senior Manager, Market Operations |
| Department: | Commercial Operations             |
| Telephone:  | 720-560-1425                      |
| Date:       | August 8, 2025                    |

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Xcel Energy

Information Request No.

9

Docket No.: E002/M-24-432

Response To: Minnesota Department of Commerce

Requestor: Peter Teigland, Andy Bahn, Rachel Wiedewitsch

Date Received: July 28, 2025

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Question:

Topic: Xcel's proposed PTR program

Reference(s): PTR Program Petition

Refer to Xcel's PTR Application, p. 14, Table 1. Please clarify the proportions of program startup costs versus annual ongoing costs included in the vendor, technology services, and administration budgets.

Response:

The costs associated with technology services are primarily related to program startup. The Company anticipates that vendor implementation and administration expenses will remain relatively stable in subsequent years. However, rebate costs are expected to grow in line with increased customer participation.

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|             |                                            |
|-------------|--------------------------------------------|
| Preparer:   | Kris Kohls                                 |
| Title:      | Regulatory Policy Specialist               |
| Department: | Customer Energy & Transportation Solutions |
| Telephone:  | 612-216-8124                               |
| Date:       | August 8, 2025                             |

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Xcel Energy Information Request No. 12  
Docket No.: E002/M-24-432  
Response To: Minnesota Department of Commerce  
Requestor: Peter Teigland, Andy Bahn, Rachel Wiedewitsch  
Date Received: July 28, 2025

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Question:

Topic: Xcel's proposed PTR program

Reference(s): PTR Program Petition

Refer to Xcel's PTR Application, Attachment D.

- a. Please clarify whether the estimated Generation Capacity benefits per kW are calculated based on the costs of capacity procured through the MISO capacity market or through other sources (e.g., bilateral agreements, Xcel-owned generation resources).
- b. Please provide all documentation supporting the calculation of the estimated per-kW generation capacity benefits in live Excel format with all formulas intact.

Response:

- a. As per the Deputy Commissioners Decision filed on March 31, 2023 in Docket No. E,G999/CIP-23-46, the Company used the MISO CONE for 2023/2024 as the basis of the Generation Capacity benefits.
- b. Please refer to Appendix 1 and Attachment A of the Company's compliance filing on January 29, 2024 in Docket No. G,E002/CIP-23-92 for these calculations.

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Preparer: Karl Shlanta  
Title: DSM Technical Policy Specialist  
Department: Customer Energy & Transportation Solutions  
Telephone: 612-216-8127  
Date: August 8, 2025

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|                |                                               |    |
|----------------|-----------------------------------------------|----|
| Xcel Energy    | Information Request No.                       | 21 |
| Docket No.:    | E002/M-24-432                                 |    |
| Response To:   | Minnesota Department of Commerce              |    |
| Requestor:     | Peter Teigland, Andy Bahn, Rachel Wiedewitsch |    |
| Date Received: | July 29, 2025                                 |    |

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Question:

Reference(s): PTR Program Petition

Refer to Xcel's PTR Application, p. 9, which states "Updates to the Midcontinent Independent System Operator (MISO) market rules may make it more difficult to utilize a PTR program because of unpredictability of load response."

1. Please provide these updates, as well as the current MISO policy for accepting capacity bids from demand response and PTR programs.
2. If Xcel bid all capacity of its PTR program into the MISO market, please explain any adjustments MISO would make to the bid and provide expected revenues based on the most recent MISO capacity auction prices.

Response:

1. MISO has submitted a series of reforms in 2025 that address concerns around the current framework for demand-side resources in the MISO market. Please see FERC Docket Nos. ER25-2845, ER25-1886, ER25-2050, and ER25-1729. These filings discuss both current and proposed changes to rules regarding demand response programs in MISO. MISO intends to submit a fifth filing later this year that will address Load Modifying Resource (LMR) replacements, test deferrals, and non-performance penalties.
2. If the capacity from the PTR program qualified as a capacity resource under the MISO tariff, the Company would utilize the PTR capacity resource in the same manner as any other Company capacity resource to meet its Planning Resource Margin Requirements. Any PTR capacity resources that cleared the MISO annual Planning Resource Auction would receive the seasonal Auction Clearing Price for the applicable season.

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Preparer: Annie Dellva  
Title: Senior Manager, Market Operations

Department: Commercial Operations

Telephone: 720-560-1425

Date: August 8, 2025

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Xcel Energy Information Request No. 24  
Docket No.: E002/M-24-432  
Response To: Minnesota Department of Commerce  
Requestor: Peter Teigland, Andy Bahn, Rachel Wiedewitsch  
Date Received: July 29, 2025

Question:

Topic: Xcel's proposed PTR program

Reference(s): PTR Program Petition

In Excel format, please provide hourly emissions rates for each hour from 2020-2024. In each year, please identify the peak hour (date and time). If this data is not available, please provide all information available related to hourly emissions rates and peak load date and time from 2020-2024.

Response:

The hourly data from January 2024 through June 2025 is provided as Attachment A. These are estimates based on the actual generation MWh for each plant applied to an average historical rate of emissions for each plant. This data is not available for 2020-2023.

The actual peak load dates and times from 2020-2024 are available on page 401b of the NSP-Minnesota annual FERC Form 1 for the years 2020-2024 and referenced in the chart below:

**Peak Load Date and Time**

| <b>Year</b> | <b>Date</b> | <b>Hour</b> | <b>Peak Load</b> |
|-------------|-------------|-------------|------------------|
| 2020        | July 8      | 1700        | 7,215            |
| 2021        | July 27     | 1800        | 7,548            |
| 2022        | June 20     | 1700        | 7,882            |
| 2023        | August 23   | 1600        | 7,806            |
| 2024        | August 26   | 1700        | 7,444            |

Attachment A is marked "Not-Public" in its entirety as it comprises information the Company considers to be trade secret data as defined by Minn. Stat. § 13.37(1)(b). The information contains confidential data that derives an independent economic

value from not being generally known or readily ascertainable by others who could obtain economic value or a financial advantage from its disclosure or use. The Company takes efforts to protect this information from public disclosure. Thus, Xcel Energy excises this information as protected data pursuant to Minn. Rule 7829.0500.

1. **Nature of the Material:** Hourly Historical Data
2. **Author(s):** Jeremy Petersen
3. **Importance:** Contains not-public, proprietary information.
4. **Date the Information was Prepared:** August 6, 2025

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|             |                                            |
|-------------|--------------------------------------------|
| Preparer:   | Jeremy Petersen                            |
| Title:      | Regulatory Policy Specialist               |
| Department: | Customer Energy & Transportation Solutions |
| Telephone:  | 612-330-7934                               |
| Date:       | August 8, 2025                             |

## **CERTIFICATE OF SERVICE**

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

**Minnesota Department of Commerce  
Public Comments**

**Docket No. E002/M-24-432**

Dated this 5<sup>th</sup> day of **September 2025**

**/s/Sharon Ferguson**



| #  | First Name | Last Name  | Email                       | Organization                      | Agency                             | Address                                                                     | Delivery Method    | Alternate Delivery Method | View Trade Secret | Service List Name |
|----|------------|------------|-----------------------------|-----------------------------------|------------------------------------|-----------------------------------------------------------------------------|--------------------|---------------------------|-------------------|-------------------|
| 14 | Thomas     | Ashley     | tom@greenlots.com           | Greenlots                         |                                    | null null, null United States                                               | Electronic Service |                           | No                | Official 24-432   |
| 15 | Donna      | Attanasio  | dattanasio@gwu.edu          | George Washington University      |                                    | 2000 H Street NW Washington DC, 20052 United States                         | Electronic Service |                           | No                | Official 24-432   |
| 16 | Kevin      | Auerbacher | kauerbacher@tesla.com       | Tesla, Inc.                       |                                    | 1050 K Street NW, Suite 101 Washington DC, 20001 United States              | Electronic Service |                           | No                | Official 24-432   |
| 17 | John       | Bailey     | bailey@ilsr.org             | Institute For Local Self-Reliance |                                    | 1313 5th St SE Ste 303 Minneapolis MN, 55414 United States                  | Electronic Service |                           | No                | Official 24-432   |
| 18 | Anjali     | Bains      | bains@fresh-energy.org      | Fresh Energy                      |                                    | 408 Saint Peter Ste 220 Saint Paul MN, 55102 United States                  | Electronic Service |                           | No                | Official 24-432   |
| 19 | Mark       | Bakk       | mbakk@lcp.coop              | Lake Country Power                |                                    | 26039 Bear Ridge Drive Cohasset MN, 55721 United States                     | Electronic Service |                           | No                | Official 24-432   |
| 20 | Gail       | Baranko    | gail.baranko@xcelenergy.com | Xcel Energy                       |                                    | 414 Nicollet Mall 7th Floor Minneapolis MN, 55401 United States             | Electronic Service |                           | No                | Official 24-432   |
| 21 | Max        | Baumhefner | mbaumhefner@nrdc.org        | Natural Resources Defense Council |                                    | 111 Sutter St 21st Fl San Francisco CA, 94104 United States                 | Electronic Service |                           | No                | Official 24-432   |
| 22 | Jessica L  | Bayles     | jessica.bayles@stoel.com    | Stoel Rives LLP                   |                                    | 1150 18th St NW Ste 325 Washington DC, 20036 United States                  | Electronic Service |                           | No                | Official 24-432   |
| 23 | Mathias    | Bell       | mathias@weavegrid.com       | WeaveGrid                         |                                    | 375 Alabama Street, Suite 325 San Francisco CA, 94110 United States         | Electronic Service |                           | No                | Official 24-432   |
| 24 | David      | Bender     | dbender@earthjustice.org    | Earthjustice                      |                                    | 1001 G Street NW Suite 1000 Washington DC, 20001 United States              | Electronic Service |                           | No                | Official 24-432   |
| 25 | 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                | Official 24-432   |
| 26 | Laura      | Bishop     | laura.bishop@state.mn.us    |                                   | Minnesota Pollution Control Agency | 520 Lafayette Rd Saint Paul MN, 55155 United States                         | Electronic Service |                           | No                | Official 24-432   |
| 27 | Ingrid     | Bjorklund  | ingrid@bjorklundlaw.com     | Bjorklund Law, PLLC               |                                    | 855 Village Center Drive #256 North Oaks MN, 55127 United States            | Electronic Service |                           | No                | Official 24-432   |
| 28 | William    | Black      | bblack@mmua.org             | MMUA                              |                                    | Suite 200 3131                                                              | Electronic Service |                           | No                | Official 24-432   |

| #  | First Name | Last Name | Email                             | Organization                               | Agency                                                          | Address                                                                                | Delivery Method    | Alternate Delivery Method | View Trade Secret | Service List Name |
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|    |            |           |                                   |                                            |                                                                 | Fernbrook Lane North<br>Plymouth MN, 55447<br>United States                            |                    |                           |                   |                   |
| 29 | Zoe        | Bourgerie | zoe.bourgerie@minneapolismn.gov   | Minneapolis City of Lakes                  |                                                                 | 350 S 5th St<br>Rm 307<br>Minneapolis MN, 55415<br>United States                       | Electronic Service |                           | No                | Official 24-432   |
| 30 | Kenneth    | Bradley   | kbradley@environmentminnesota.org |                                            |                                                                 | 2837 Emerson Ave<br>S Apt CW112<br>Minneapolis MN, 55408<br>United States              | Electronic Service |                           | No                | Official 24-432   |
| 31 | Elizabeth  | Brama     | ebrama@taftlaw.com                | Taft Stettinius & Hollister LLP            |                                                                 | 2200 IDS Center<br>80 South 8th Street<br>Minneapolis MN, 55402<br>United States       | Electronic Service |                           | No                | Official 24-432   |
| 32 | Jon        | Brekke    | jbrekke@grenergy.com              | Great River Energy                         |                                                                 | 12300 Elm Creek<br>Boulevard<br>Maple Grove MN, 55369-4718<br>United States            | Electronic Service |                           | No                | Official 24-432   |
| 33 | Sydney R.  | Briggs    | sbriggs@swce.coop                 | Steele-Waseca Cooperative Electric         |                                                                 | 2411 W. Bridge St<br>PO Box 485<br>Owatonna MN, 55060-0485<br>United States            | Electronic Service |                           | No                | Official 24-432   |
| 34 | Mark B.    | Bring     | mbring@otpc.com                   | Otter Tail Power Company                   |                                                                 | 215 South Cascade Street<br>PO Box 496<br>Fergus Falls MN, 56538-0496<br>United States | Electronic Service |                           | No                | Official 24-432   |
| 35 | Matthew    | Brodin    | mbrodin@allete.com                | Minnesota Power                            |                                                                 | 30 West Superior Street<br>Duluth MN, 55802<br>United States                           | Electronic Service |                           | No                | Official 24-432   |
| 36 | Janet      | Brown     | jab5100@gmail.com                 | Sabathani Community Center (Sabathani/SCC) |                                                                 | 310 E 38th St<br>Ste 200<br>Minneapolis MN, 55409<br>United States                     | Electronic Service |                           | No                | Official 24-432   |
| 37 | Christina  | Brusven   | cbrusven@fredlaw.com              | Fredrikson Byron                           |                                                                 | 60 S 6th St<br>Ste 1500<br>Minneapolis MN, 55402-4400<br>United States                 | Electronic Service |                           | No                | Official 24-432   |
| 38 | Mike       | Bull      | mike.bull@state.mn.us             |                                            | Public Utilities Commission                                     | 121 7th Place<br>East, Suite 350<br>St. Paul MN, 55101<br>United States                | Electronic Service |                           | Yes               | Official 24-432   |
| 39 | James      | Canaday   | james.canaday@ag.state.mn.us      |                                            | Office of the Attorney General - Residential Utilities Division | Suite 1400<br>445 Minnesota St.<br>St. Paul MN, 55101<br>United States                 | Electronic Service |                           | Yes               | Official 24-432   |
| 40 | Thomas     | Carlson   | thomas.carlson@edf-re.com         | EDF Renewable Energy                       |                                                                 | 10 2nd St NE<br>Ste. 400<br>Minneapolis                                                | Electronic Service |                           | No                | Official 24-432   |

| #  | First Name | Last Name             | Email                             | Organization                                                              | Agency                                                                         | Address                                                                                               | Delivery Method       | Alternate Delivery Method | View Trade Secret | Service List Name  |
|----|------------|-----------------------|-----------------------------------|---------------------------------------------------------------------------|--------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------|-----------------------|---------------------------|-------------------|--------------------|
|    |            |                       |                                   |                                                                           |                                                                                | MN, 55413<br>United States                                                                            |                       |                           |                   |                    |
| 41 | Douglas M. | Carnival              | dcarnival@carnivalberns.com       | McGrann Shea<br>Carnival<br>Straughn &<br>Lamb                            |                                                                                | 800 Nicollet<br>Mall Ste 2600<br>Minneapolis<br>MN, 55402-<br>7035<br>United States                   | Electronic<br>Service |                           | No                | Official<br>24-432 |
| 42 | Gabriel    | Chan                  | gabechan@umn.edu                  |                                                                           |                                                                                | 130 Hubert H.<br>Humphrey<br>Center<br>301 19th Ave<br>S<br>Minneapolis<br>MN, 55455<br>United States | Electronic<br>Service |                           | No                | Official<br>24-432 |
| 43 | Cody       | Chilson               | cchilson@greatermngas.com         | Greater<br>Minnesota Gas,<br>Inc. & Greater<br>MN<br>Transmission,<br>LLC |                                                                                | 1900 Cardinal<br>Ln<br>PO Box 798<br>Faribault MN,<br>55021<br>United States                          | Electronic<br>Service |                           | No                | Official<br>24-432 |
| 44 | Ray        | Choquette             | rchoquette@agp.com                | Ag Processing<br>Inc.                                                     |                                                                                | 12700 West<br>Dodge Road<br>PO Box 2047<br>Omaha NE,<br>68103-2047<br>United States                   | Electronic<br>Service |                           | No                | Official<br>24-432 |
| 45 | John       | Coffman               | john@johncoffman.net              | AARP                                                                      |                                                                                | 871 Tuxedo<br>Blvd.<br>St. Louis MO,<br>63119-2044<br>United States                                   | Electronic<br>Service |                           | No                | Official<br>24-432 |
| 46 | Kenneth A. | Colburn               | kcolburn@symbioticstrategies.com  | Symbiotic<br>Strategies, LLC                                              |                                                                                | 26 Winton<br>Road<br>Meredith NH,<br>32535413<br>United States                                        | Electronic<br>Service |                           | No                | Official<br>24-432 |
| 47 | Brent      | Coleman               | bkc@dvclaw.com                    | Electrify<br>America, LLC                                                 |                                                                                | 1750 SW<br>Harbor Way<br>Suite 450<br>Portland OR,<br>97201<br>United States                          | Electronic<br>Service |                           | No                | Official<br>24-432 |
| 48 | Generic    | Commerce<br>Attorneys | commerce.attorneys@ag.state.mn.us |                                                                           | Office of the<br>Attorney<br>General -<br>Department of<br>Commerce            | 445<br>Minnesota<br>Street Suite<br>1400<br>St. Paul MN,<br>55101<br>United States                    | Electronic<br>Service |                           | Yes               | Official<br>24-432 |
| 49 | Erin       | Conti                 | erin.conti@ag.state.mn.us         |                                                                           | Office of the<br>Attorney<br>General -<br>Residential<br>Utilities<br>Division | 445<br>Minnesota<br>Street, Suite<br>1400<br>St. Paul MN,<br>55101<br>United States                   | Electronic<br>Service |                           | Yes               | Official<br>24-432 |
| 50 | Grace      | Corbin                | g.corbin@mpls-synod.org           | Eco-Faith<br>Network                                                      |                                                                                | 122 W<br>Franklin Ave<br>Ste 600<br>Minneapolis<br>MN, 55404<br>United States                         | Electronic<br>Service |                           | No                | Official<br>24-432 |
| 51 | Hillary    | Creurer               | hcreurer@allte.com                | Minnesota<br>Power                                                        |                                                                                | 30 W Superior<br>St<br>Duluth MN,<br>55802<br>United States                                           | Electronic<br>Service |                           | No                | Official<br>24-432 |
| 52 | George     | Crocker               | gwillc@nawo.org                   | North American<br>Water Office                                            |                                                                                | 5093 Keats<br>Avenue<br>Lake Elmo<br>MN, 55042<br>United States                                       | Electronic<br>Service |                           | No                | Official<br>24-432 |
| 53 | Leigh      | Currie                | lcurrie@mncenter.org              | Minnesota<br>Center for                                                   |                                                                                | 1919<br>University Ave                                                                                | Electronic<br>Service |                           | No                | Official<br>24-432 |



| #  | First Name | Last Name      | Email                               | Organization                        | Agency                 | Address                                                                                        | Delivery Method    | Alternate Delivery Method | View Trade Secret | Service List Name |
|----|------------|----------------|-------------------------------------|-------------------------------------|------------------------|------------------------------------------------------------------------------------------------|--------------------|---------------------------|-------------------|-------------------|
| 67 | Brian      | Edstrom        | briane@cubminnesota.org             | Citizens Utility Board of Minnesota |                        | 332 Minnesota St<br>Ste W1360<br>Saint Paul MN, 55101<br>United States                         | Electronic Service |                           | No                | Official 24-432   |
| 68 | William    | Ehrlich        | wehrlich@tesla.com                  | Tesla, Inc.                         |                        | 3500 Deer Creek Rd<br>Palo Alto CA, 94304<br>United States                                     | Electronic Service |                           | No                | Official 24-432   |
| 69 | Kristen    | Eide Tollefson | healingsystems69@gmail.com          | R-CURE                              |                        | 28477 N Lake Ave<br>Frontenac MN, 55026-1044<br>United States                                  | Electronic Service |                           | No                | Official 24-432   |
| 70 | Rebecca    | Eilers         | rebecca.d.eilers@xcelenergy.com     | Xcel Energy                         |                        | 414 Nicollet Mall - 401 7th Floor<br>Minneapolis MN, 55401<br>United States                    | Electronic Service |                           | No                | Official 24-432   |
| 71 | Bob        | Eleff          | bob.eleff@house.mn                  | Regulated Industries Cmte           |                        | 100 Rev Dr Martin Luther King Jr Blvd<br>Room 600<br>St. Paul MN, 55155<br>United States       | Electronic Service |                           | No                | Official 24-432   |
| 72 | Ron        | Elwood         | relwood@mnlisap.org                 | Legal Services Advocacy Project     |                        | 970 Raymond Avenue<br>Suite G-40<br>Saint Paul MN, 55114<br>United States                      | Electronic Service |                           | No                | Official 24-432   |
| 73 | John       | Farrell        | jfarrell@ilsr.org                   | Institute for Local Self-Reliance   |                        | 2720 E. 22nd St<br>Institute for Local Self-Reliance<br>Minneapolis MN, 55406<br>United States | Electronic Service |                           | No                | Official 24-432   |
| 74 | Eric       | Fehlhaber      | efehlhaber@dakotaelectric.com       | Dakota Electric Association         |                        | 4300 220th St W<br>Farmington MN, 55024<br>United States                                       | Electronic Service |                           | No                | Official 24-432   |
| 75 | Sharon     | Ferguson       | sharon.ferguson@state.mn.us         |                                     | Department of Commerce | 85 7th Place E Ste 280<br>Saint Paul MN, 55101-2198<br>United States                           | Electronic Service |                           | No                | Official 24-432   |
| 76 | Mike       | Fiterman       | mikefiterman@libertydiversified.com | Liberty Diversified International   |                        | 5600 N Highway 169<br>Minneapolis MN, 55428-3096<br>United States                              | Electronic Service |                           | No                | Official 24-432   |
| 77 | David A.   | Fitzgerald     | daf@dvclaw.com                      | Davison Van Cleve                   |                        | 2321 Fairview Ave E #3<br>Seattle WA, 98102<br>United States                                   | Electronic Service |                           | No                | Official 24-432   |
| 78 | Lucas      | Franco         | lfranco@liunagroc.com               | LIUNA                               |                        | 81 Little Canada Rd E<br>Little Canada MN, 55117<br>United States                              | Electronic Service |                           | No                | Official 24-432   |
| 79 | Nathan     | Franzen        | nathan@nationalgridrenewables.com   | Geronimo Energy, LLC                |                        | 8400 Normandale Lake Blvd<br>Ste 1200<br>Bloomington                                           | Electronic Service |                           | No                | Official 24-432   |

| #  | First Name | Last Name | Email                          | Organization                         | Agency | Address                                                                                | Delivery Method    | Alternate Delivery Method | View Trade Secret | Service List Name |
|----|------------|-----------|--------------------------------|--------------------------------------|--------|----------------------------------------------------------------------------------------|--------------------|---------------------------|-------------------|-------------------|
|    |            |           |                                |                                      |        | MN, 55437<br>United States                                                             |                    |                           |                   |                   |
| 80 | Daryll     | Fuentes   | energy@usg.com                 | USG Corporation                      |        | 550 W Adams St<br>Chicago IL,<br>60661<br>United States                                | Electronic Service |                           | No                | Official 24-432   |
| 81 | James      | Garness   | james.r.garness@xcelenergy.com |                                      |        | null null, null<br>United States                                                       | Electronic Service |                           | No                | Official 24-432   |
| 82 | Patti      | Gartland  | pgartland@greaterstcloud.com   | Greater St. Cloud Development Corp.  |        | 501 West St<br>Germain St<br>Ste 100<br>St. Cloud MN,<br>56301<br>United States        | Electronic Service |                           | No                | Official 24-432   |
| 83 | Edward     | Garvey    | garveyed@aol.com               | Residence                            |        | 32 Lawton St<br>Saint Paul<br>MN, 55102<br>United States                               | Electronic Service |                           | No                | Official 24-432   |
| 84 | Allen      | Gleckner  | gleckner@fresh-energy.org      | Fresh Energy                         |        | 408 St. Peter Street<br>Ste 350<br>Saint Paul<br>MN, 55102<br>United States            | Electronic Service |                           | No                | Official 24-432   |
| 85 | Allen      | Gleckner  | agleckner@elpc.org             | Environmental Law & Policy Center    |        | 35 E. Wacker Drive, Suite 1600<br>Suite 1600<br>Chicago IL,<br>60601<br>United States  | Electronic Service |                           | No                | Official 24-432   |
| 86 | Jenny      | Glumack   | jenny@mrea.org                 | Minnesota Rural Electric Association |        | 11640 73rd Ave N<br>Maple Grove<br>MN, 55369<br>United States                          | Electronic Service |                           | No                | Official 24-432   |
| 87 | Anita      | Grace     | anita@gracemulticultural.com   | GRACE Multictural                    |        | 12959 196th LN NW<br>Elk River MN,<br>55330<br>United States                           | Electronic Service |                           | No                | Official 24-432   |
| 88 | Ryan       | Granholm  | ryan.granholm@afslaw.com       | ArentFox Schiff LLP                  |        | 233 S Wacker Dr.<br>Ste. 7100<br>Chicago IL,<br>60647<br>United States                 | Electronic Service |                           | No                | Official 24-432   |
| 89 | Todd J.    | Guerrero  | todd.guerrero@kutakrock.com    | Kutak Rock LLP                       |        | Suite 1750<br>220 South Sixth Street<br>Minneapolis<br>MN, 55402-1425<br>United States | Electronic Service |                           | No                | Official 24-432   |
| 90 | Natalie    | Haberman  | townsend@fresh-energy.org      | Fresh Energy                         |        | 408 St Peter St # 350<br>St. Paul MN,<br>55102<br>United States                        | Electronic Service |                           | No                | Official 24-432   |
| 91 | Joe        | Halso     | joe.halso@sierraclub.org       | Sierra Club                          |        | 1536 Wynkoop St<br>Ste 200<br>Denver CO,<br>80202<br>United States                     | Electronic Service |                           | No                | Official 24-432   |
| 92 | Katherine  | Hamilton  | katherine@aem-alliance.org     | Advanced Energy Management Alliance  |        | 1701 Rhode Island Ave,<br>NW<br>Washington DC, 20036<br>United States                  | Electronic Service |                           | No                | Official 24-432   |
| 93 | Jason G.   | Harp      | jason.harp@afslaw.com          | ArentFox Schiff LLP                  |        | 233 S Wacker Dr<br>Ste 7100                                                            | Electronic Service |                           | No                | Official 24-432   |

| #   | First Name | Last Name | Email                              | Organization                                          | Agency                                                          | Address                                                                         | Delivery Method    | Alternate Delivery Method | View Trade Secret | Service List Name |
|-----|------------|-----------|------------------------------------|-------------------------------------------------------|-----------------------------------------------------------------|---------------------------------------------------------------------------------|--------------------|---------------------------|-------------------|-------------------|
|     |            |           |                                    |                                                       |                                                                 | Chicago IL, 60606<br>United States                                              |                    |                           |                   |                   |
| 94  | Matthew B  | Harris    | matt.b.harris@xcelenergy.com       | XCEL ENERGY                                           |                                                                 | 401 Nicollet Mall FL 8<br>Minneapolis MN, 55401<br>United States                | Electronic Service |                           | No                | Official 24-432   |
| 95  | Shubha     | Harris    | shubha.m.harris@xcelenergy.com     | Xcel Energy                                           |                                                                 | 414 Nicollet Mall, 401 - FL 8<br>Minneapolis MN, 55401<br>United States         | Electronic Service |                           | No                | Official 24-432   |
| 96  | Erik       | Hatlestad | erik@cureriver.org                 |                                                       |                                                                 | 117 1st St<br>Montevideo MN, 56265<br>United States                             | Electronic Service |                           | No                | Official 24-432   |
| 97  | Kim        | Havey     | kim.havey@minneapolismn.gov        | City of Minneapolis                                   |                                                                 | 350 South 5th Street,<br>Suite 315M<br>Minneapolis MN, 55415<br>United States   | Electronic Service |                           | No                | Official 24-432   |
| 98  | Philip     | Hayet     | phayet@jkenn.com                   | J. Kennedy and Associates, Inc.                       |                                                                 | 570 Colonial Park Drive<br>Suite 305<br>Roswell GA, 30075-3770<br>United States | Electronic Service |                           | No                | Official 24-432   |
| 99  | Todd       | Headlee   | theadlee@dvigridsolutions.com      | Dominion Voltage, Inc.                                |                                                                 | 701 E. Cary Street<br>Richmond VA, 23219<br>United States                       | Electronic Service |                           | No                | Official 24-432   |
| 100 | Amber      | Hedlund   | amber.r.hedlund@xcelenergy.com     | Northern States Power Company<br>dba Xcel Energy-Elec |                                                                 | 414 Nicollet Mall, 401-7<br>Minneapolis MN, 55401<br>United States              | Electronic Service |                           | No                | Official 24-432   |
| 101 | Adam       | Heinen    | aheinen@dakotaelectric.com         | Dakota Electric Association                           |                                                                 | 4300 220th St W<br>Farmington MN, 55024<br>United States                        | Electronic Service |                           | No                | Official 24-432   |
| 102 | Annete     | Henkel    | mui@mnuutilityinvestors.org        | Minnesota Utility Investors                           |                                                                 | 413 Wacouta Street<br>#230<br>St.Paul MN, 55101<br>United States                | Electronic Service |                           | No                | Official 24-432   |
| 103 | Jessy      | Hennesy   | jessy.hennesy@avantenergy.com      | Avant Energy                                          |                                                                 | 220 S. Sixth St. Ste 1300<br>Minneapolis MN, 55402<br>United States             | Electronic Service |                           | No                | Official 24-432   |
| 104 | Sandra     | Henry     | sandra.henry@elevatenp.org         | Elevate                                               |                                                                 | 322 S Green St Ste 300<br>Chicago IL, 60607<br>United States                    | Electronic Service |                           | No                | Official 24-432   |
| 105 | Katherine  | Hinderlie | katherine.hinderlie@ag.state.mn.us |                                                       | Office of the Attorney General - Residential Utilities Division | 445 Minnesota St<br>Suite 1400<br>St. Paul MN, 55101-2134<br>United States      | Electronic Service |                           | Yes               | Official 24-432   |
| 106 | Corey      | Hintz     | chintz@dakotaelectric.com          | Dakota Electric Association                           |                                                                 | 4300 220th Street<br>Farmington MN, 55024-9583<br>United States                 | Electronic Service |                           | No                | Official 24-432   |
| 107 | Joe        | Hoffman   | ja.hoffman@smmpa.org               | SMMPA                                                 |                                                                 | 500 First Ave SW<br>Rochester                                                   | Electronic Service |                           | No                | Official 24-432   |

| #   | First Name | Last Name        | Email                              | Organization                     | Agency | Address                                                                       | Delivery Method    | Alternate Delivery Method | View Trade Secret | Service List Name |
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|     |            |                  |                                    |                                  |        | MN, 55902-3303<br>United States                                               |                    |                           |                   |                   |
| 108 | Michael    | Hoppe            | lu23@ibew23.org                    | Local Union 23,<br>I.B.E.W.      |        | 445 Etna Street<br>Ste. 61<br>St. Paul MN,<br>55106<br>United States          | Electronic Service |                           | No                | Official 24-432   |
| 109 | MJ         | Horner           | mj.horner@xcelenergy.com           |                                  |        | null null, null<br>United States                                              | Electronic Service |                           | No                | Official 24-432   |
| 110 | Samantha   | Houston          | shouston@ucsusa.org                | Union of Concerned Scientists    |        | 1825 K St.<br>NW Ste 800<br>Washington DC, 20006<br>United States             | Electronic Service |                           | No                | Official 24-432   |
| 111 | Lori       | Hoyum            | lhoyum@mnpower.com                 | Minnesota Power                  |        | 30 West Superior Street<br>Duluth MN,<br>55802<br>United States               | Electronic Service |                           | No                | Official 24-432   |
| 112 | Jan        | Hubbard          | jan.hubbard@comcast.net            |                                  |        | 7730 Mississippi Lane<br>Brooklyn Park MN, 55444<br>United States             | Electronic Service |                           | No                | Official 24-432   |
| 113 | Holmes     | Hummel           | holmes.hummel@cleanenergyworks.org | Clean Energy Works               |        | 925 French St<br>NW<br>Washington DC, 20001<br>United States                  | Electronic Service |                           | No                | Official 24-432   |
| 114 | Geoffrey   | Inge             | ginge@regintl.com                  | Regulatory Intelligence LLC      |        | PO Box 270636<br>Superior CO, 80027-9998<br>United States                     | Electronic Service |                           | No                | Official 24-432   |
| 115 | Casey      | Jacobson         | cjacobson@bepc.com                 | Basin Electric Power Cooperative |        | 1717 East Interstate Avenue<br>Bismarck ND, 58501<br>United States            | Electronic Service |                           | No                | Official 24-432   |
| 116 | Travis     | Jacobson         | travis.jacobson@mdu.com            | Great Plains Natural Gas Company |        | 400 N 4th St<br>Bismarck ND, 58501<br>United States                           | Electronic Service |                           | No                | Official 24-432   |
| 117 | John S.    | Jaffray          | jjaffray@jjrpower.com              | JJR Power                        |        | 350 Highway 7 Suite 236<br>Excelsior MN, 55331<br>United States               | Electronic Service |                           | No                | Official 24-432   |
| 118 | Alan       | Jenkins          | aj@jenkinsatlaw.com                | Jenkins at Law                   |        | 2950 Yellowtail Ave.<br>Marathon FL, 33050<br>United States                   | Electronic Service |                           | No                | Official 24-432   |
| 119 | Andrea     | Jenkins          | andrea.jenkins@minneapolismn.gov   | Minneapolis City of Lakes        |        | 350 S 5th St<br>Room 307<br>Minneapolis MN, 55415<br>United States            | Electronic Service |                           | No                | Official 24-432   |
| 120 | Richard    | Johnson          | rick.johnson@lawmoss.com           | Moss & Barnett                   |        | 150 S. 5th Street<br>Suite 1200<br>Minneapolis MN, 55402<br>United States     | Electronic Service |                           | No                | Official 24-432   |
| 121 | Sarah      | Johnson Phillips | sjphillips@stoel.com               | Stoel Rives LLP                  |        | 33 South Sixth Street<br>Suite 4200<br>Minneapolis MN, 55402<br>United States | Electronic Service |                           | No                | Official 24-432   |

| #   | First Name | Last Name | Email                                  | Organization                                        | Agency                             | Address                                                                                              | Delivery Method    | Alternate Delivery Method | View Trade Secret | Service List Name |
|-----|------------|-----------|----------------------------------------|-----------------------------------------------------|------------------------------------|------------------------------------------------------------------------------------------------------|--------------------|---------------------------|-------------------|-------------------|
| 122 | Nate       | Jones     | njones@hcpd.com                        | Heartland Consumers Power                           |                                    | PO Box 248<br>Madison SD,<br>57042<br>United States                                                  | Electronic Service |                           | No                | Official 24-432   |
| 123 | Philip     | Jones     | phil@philjonesconsulting.com           | Alliance for Transportation Electrification         |                                    | 1402 3rd Ave<br>Ste 1315<br>Seattle WA,<br>98101<br>United States                                    | Electronic Service |                           | No                | Official 24-432   |
| 124 | Brendan    | Jordan    | bjordan@gpsid.net                      | Great Plains Institute & Bioeconomy Coalition of MN |                                    | 2801 21st Ave<br>S Ste 220<br>Minneapolis<br>MN, 55407<br>United States                              | Electronic Service |                           | No                | Official 24-432   |
| 125 | Bina       | Joshi     | bina.joshi@afslaw.com                  | ArentFox Schiff LLP                                 |                                    | 233 S Wacker Dr<br>Ste 7100<br>Chicago IL,<br>60606<br>United States                                 | Electronic Service |                           | No                | Official 24-432   |
| 126 | Dan        | Juhl      | in.another.account.info@juhlenergy.com | Juhl Energy Inc.                                    |                                    | 1502 17th St<br>SE<br>Pipestone<br>MN, 56164<br>United States                                        | Paper Service      |                           | No                | Official 24-432   |
| 127 | Mahmoud    | Kabalan   | mahmoud.kabalan@stthomas.edu           | University of St Thomas                             |                                    | 2115 Summit Ave. Mail<br>OSS100<br>School of Engineering<br>Saint Paul<br>MN, 55105<br>United States | Electronic Service |                           | No                | Official 24-432   |
| 128 | Michael    | Kampmeyer | mkampmeyer@a-e-group.com               | AEG Group, LLC                                      |                                    | 260 Salem Church Road<br>Sunfish Lake<br>MN, 55118<br>United States                                  | Electronic Service |                           | No                | Official 24-432   |
| 129 | Nick       | Kaneski   | nick.kaneski@enbridge.com              | Enbridge Energy Company, Inc.                       |                                    | 11 East Superior St<br>Ste 125<br>Duluth MN,<br>55802<br>United States                               | Electronic Service |                           | No                | Official 24-432   |
| 130 | Stacey     | Karels    | skarels@local563.org                   | Mankato Area Bldg & Construction Trades Council     |                                    | 310 McKinzie St<br>Mankato MN,<br>56001<br>United States                                             | Electronic Service |                           | No                | Official 24-432   |
| 131 | William    | Kenworthy | will@votesolar.org                     |                                                     |                                    | 1 South Dearborn St<br>Ste 2000<br>Chicago IL,<br>60603<br>United States                             | Electronic Service |                           | No                | Official 24-432   |
| 132 | Samuel B.  | Ketchum   | sketchum@kennedy-graven.com            | Kennedy & Graven, Chartered                         |                                    | 150 S 5th St<br>Ste 700<br>Minneapolis<br>MN, 55402<br>United States                                 | Electronic Service |                           | No                | Official 24-432   |
| 133 | Chris      | King      | chris_king@siemens.com                 | Siemens                                             |                                    | 4000 E. Third Ave<br>Suite 400<br>Foster City<br>CA, 94404<br>United States                          | Electronic Service |                           | No                | Official 24-432   |
| 134 | Frank      | Kohlasch  | frank.kohlasch@state.mn.us             |                                                     | Minnesota Pollution Control Agency | 520 Lafayette Rd N.<br>St. Paul MN,<br>55155<br>United States                                        | Electronic Service |                           | No                | Official 24-432   |
| 135 | Brian      | Krambeer  | bkrambeer@mienergy.coop                | MiEnergy Cooperative                                |                                    | PO Box 626<br>31110<br>Cooperative Way<br>Rushford MN,                                               | Electronic Service |                           | No                | Official 24-432   |

| #   | First Name | Last Name        | Email                        | Organization                               | Agency | Address                                                                                | Delivery Method       | Alternate Delivery Method | View Trade Secret | Service List Name  |
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|     |            |                  |                              |                                            |        | 55971<br>United States                                                                 |                       |                           |                   |                    |
| 136 | Michael    | Krause           | michaelkrause61@yahoo.com    |                                            |        | 1200<br>Plymouth<br>Avenue<br>Minneapolis<br>MN, 55411<br>United States                | Electronic<br>Service |                           | No                | Official<br>24-432 |
| 137 | Michael    | Krikava          | mkrikava@taftlaw.com         | Taft Stettinius &<br>Hollister LLP         |        | 2200 IDS<br>Center<br>80 S 8th St<br>Minneapolis<br>MN, 55402<br>United States         | Electronic<br>Service |                           | No                | Official<br>24-432 |
| 138 | Nicolle    | Kupser           | nkupser@greatermngas.com     | Greater<br>Minnesota Gas,<br>Inc.          |        | 1900 Cardinal<br>Ln<br>PO Box 798<br>Faribault MN,<br>55021<br>United States           | Electronic<br>Service |                           | No                | Official<br>24-432 |
| 139 | Matthew    | Lacey            | mlacey@grenergy.com          | Great River<br>Energy                      |        | 12300 Elm<br>Creek<br>Boulevard<br>Maple Grove<br>MN, 55369-<br>4718<br>United States  | Electronic<br>Service |                           | No                | Official<br>24-432 |
| 140 | Mary       | LaGarde          | mlagarde@maicnet.org         | Minneapolis<br>American Indian<br>Center   |        | 1530 E<br>Franklin Ave<br>Minneapolis<br>MN, 55404<br>United States                    | Electronic<br>Service |                           | No                | Official<br>24-432 |
| 141 | Holly      | Lahd             | holly.lahd@target.com        | Target<br>Corporation                      |        | 33 South 6th<br>St<br>CC-28662<br>Minneapolis<br>MN, 55402<br>United States            | Electronic<br>Service |                           | No                | Official<br>24-432 |
| 142 | Carmel     | Laney            | carmel.laney@stoel.com       | Stoel Rives LLP                            |        | 33 South<br>Sixth Street<br>Suite 4200<br>Minneapolis<br>MN, 55402<br>United States    | Electronic<br>Service |                           | No                | Official<br>24-432 |
| 143 | James D.   | Larson           | james.larson@avantenergy.com | Avant Energy<br>Services                   |        | 220 S 6th St<br>Ste 1300<br>Minneapolis<br>MN, 55402<br>United States                  | Electronic<br>Service |                           | No                | Official<br>24-432 |
| 144 | Peder      | Larson           | plarson@larkinhoffman.com    | Larkin Hoffman<br>Daly & Lindgren,<br>Ltd. |        | 8300 Norman<br>Center Drive<br>Suite 1000<br>Bloomington<br>MN, 55437<br>United States | Electronic<br>Service |                           | No                | Official<br>24-432 |
| 145 | Kevin      | Lee              | kleee@bluegreenalliance.org  | BlueGreen<br>Alliance                      |        | 2701<br>University Ave<br>SE<br>Ste. 209<br>Minneapolis<br>MN, 55414<br>United States  | Electronic<br>Service |                           | No                | Official<br>24-432 |
| 146 | Dean       | Leischow         | dean@sunrisenrg.com          | Sunrise Energy<br>Ventures                 |        | 315 Manitoba<br>Ave Ste 200<br>Wayzata MN,<br>55391<br>United States                   | Electronic<br>Service |                           | No                | Official<br>24-432 |
| 147 | Annie      | Levenson<br>Falk | annielf@cubminnesota.org     | Citizens Utility<br>Board of<br>Minnesota  |        | 332<br>Minnesota<br>Street, Suite<br>W1360<br>St. Paul MN,<br>55101<br>United States   | Electronic<br>Service |                           | No                | Official<br>24-432 |
| 148 | Ryan       | Long             | ryan.j.long@xcelenergy.com   |                                            |        | 414 Nicollet<br>Mall<br>401 8th Floor                                                  | Electronic<br>Service |                           | No                | Official<br>24-432 |

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|     |            |           |                                  |                                          |                                | Minneapolis<br>MN, 55401<br>United States                                                    |                       |                           |                   |                    |
| 149 | Jason      | Loos      | jason.loos@centerpointenergy.com | CenterPoint<br>Energy<br>Resources Corp. |                                | 505 Nicollet<br>Mall<br>3rd Floor<br>Minneapolis<br>MN, 55402<br>United States               | Electronic<br>Service |                           | No                | Official<br>24-432 |
| 150 | Susan      | Ludwig    | sludwig@mnpower.com              | Minnesota<br>Power                       |                                | 30 West<br>Superior<br>Street<br>Duluth MN,<br>55802<br>United States                        | Electronic<br>Service |                           | No                | Official<br>24-432 |
| 151 | Alice      | Madden    | alice@communitypowermn.org       | Community<br>Power                       |                                | 2720 E 22nd<br>St<br>Minneapolis<br>MN, 55406<br>United States                               | Electronic<br>Service |                           | No                | Official<br>24-432 |
| 152 | Kavita     | Maini     | kmaini@wi.rr.com                 | KM Energy<br>Consulting, LLC             |                                | 961 N Lost<br>Woods Rd<br>Oconomowoc<br>WI, 53066<br>United States                           | Electronic<br>Service |                           | No                | Official<br>24-432 |
| 153 | Emily      | Marshall  | emarshall@tourismarshall.com     | Miller O'Brien<br>Jensen, PA             |                                | 120 S. 6th<br>Street<br>Suite 2400<br>Minneapolis<br>MN, 55402<br>United States              | Electronic<br>Service |                           | No                | Official<br>24-432 |
| 154 | Katherine  | Marshall  | katie.marshall@lawmoss.com       | Moss & Barnett                           |                                | 150 S 5th St<br>Ste 1200<br>Minneapolis<br>MN, 55402<br>United States                        | Electronic<br>Service |                           | No                | Official<br>24-432 |
| 155 | Mary       | Martinka  | mary.a.martinka@xcelenergy.com   | Xcel Energy Inc                          |                                | 414 Nicollet<br>Mall<br>7th Floor<br>Minneapolis<br>MN, 55401<br>United States               | Electronic<br>Service |                           | No                | Official<br>24-432 |
| 156 | Gregg      | Mast      | gmast@cleanenergyeconomymn.org   | Clean Energy<br>Economy<br>Minnesota     |                                | 4808 10th<br>Avenue S<br>Minneapolis<br>MN, 55417<br>United States                           | Electronic<br>Service |                           | No                | Official<br>24-432 |
| 157 | Daryl      | Maxwell   | dmaxwell@hydro.mb.ca             | Manitoba Hydro                           |                                | 360 Portage<br>Ave FL 16<br>PO Box 815,<br>Station Main<br>Winnipeg MB,<br>R3C 2P4<br>Canada | Electronic<br>Service |                           | No                | Official<br>24-432 |
| 158 | Erica      | McConnell | emcconnell@elpc.org              | Environmental<br>Law & Policy<br>Center  |                                | 35 E. Wacker<br>Drive, Suite<br>1600<br>Chicago IL,<br>60601<br>United States                | Electronic<br>Service |                           | No                | Official<br>24-432 |
| 159 | Lilly B.   | McKenna   | lilly.mckenna@stoel.com          | Stoel Rives LLP                          |                                | One<br>Montgomery<br>St<br>Ste 3230<br>San Francisco<br>CA, 94104<br>United States           | Electronic<br>Service |                           | No                | Official<br>24-432 |
| 160 | Taylor     | McNair    | taylor@gridlab.org               |                                          |                                | 668 Capp<br>Street<br>San Francisco<br>CA, 94110<br>United States                            | Electronic<br>Service |                           | No                | Official<br>24-432 |
| 161 | Sally Anne | McShane   | sally.anne.mcshane@state.mn.us   |                                          | Public Utilities<br>Commission | 121 7th Place<br>E<br>Suite 350<br>St. Paul MN,                                              | Electronic<br>Service |                           | Yes               | Official<br>24-432 |

| #   | First Name | Last Name    | Email                             | Organization                                | Agency                                                          | Address                                                                            | Delivery Method    | Alternate Delivery Method | View Trade Secret | Service List Name |
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|     |            |              |                                   |                                             |                                                                 | 55101 United States                                                                |                    |                           |                   |                   |
| 162 | Stephen    | Melchionne   | stephen.melchionne@ag.state.mn.us |                                             | Office of the Attorney General - Department of Commerce         | 445 Minnesota Street, Ste. 1400 St. Paul MN, 55101 United States                   | Electronic Service |                           | Yes               | Official 24-432   |
| 163 | Thomas     | Melone       | thomas.melone@allcous.com         | Minnesota Go Solar LLC                      |                                                                 | 222 South 9th Street Suite 1600 Minneapolis MN, 55120 United States                | Electronic Service |                           | No                | Official 24-432   |
| 164 | Greg       | Merz         | greg.merz@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               | Official 24-432   |
| 165 | Peder      | Mewis        | pmewis@cleangridalliance.org      | Clean Grid Alliance                         |                                                                 | 570 Asbury St. St. Paul MN, 55104 United States                                    | Electronic Service |                           | No                | Official 24-432   |
| 166 | Joseph     | Meyer        | joseph.meyer@ag.state.mn.us       |                                             | Office of the Attorney General - Residential Utilities Division | Bremer Tower, Suite 1400 445 Minnesota Street St Paul MN, 55101-2131 United States | Electronic Service |                           | Yes               | Official 24-432   |
| 167 | Kevin      | Miller       | kevin.miller@chargepoint.com      |                                             |                                                                 | 254 E. Hacienda Avenue Campbell CA, 95008 United States                            | Electronic Service |                           | No                | Official 24-432   |
| 168 | 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 24-432   |
| 169 | David      | Moeller      | dmoeller@allte.com                | Minnesota Power                             |                                                                 |                                                                                    | Electronic Service |                           | No                | Official 24-432   |
| 170 | Marc       | Monbouquette | marc.monbouquette@enel.com        | Enel X North America, Inc.                  |                                                                 | 846 Bransten Rd San Carlos CA, 94070 United States                                 | Electronic Service |                           | No                | Official 24-432   |
| 171 | Dalene     | Monsebroten  | dalene.monsebroten@nmpagency.com  | Northern Municipal Power Agency             |                                                                 | 123 2nd St W Thief River Falls MN, 56701 United States                             | Electronic Service |                           | No                | Official 24-432   |
| 172 | Andrew     | Moratzka     | andrew.moratzka@stoel.com         | Stoel Rives LLP                             |                                                                 | 33 South Sixth St Ste 4200 Minneapolis MN, 55402 United States                     | Electronic Service |                           | No                | Official 24-432   |
| 173 | Christa    | Moseng       | christa.moseng@state.mn.us        |                                             | Office of Administrative Hearings                               | P.O. Box 64620 Saint Paul MN, 55164-0620 United States                             | Electronic Service |                           | Yes               | Official 24-432   |
| 174 | Evan       | Mulholland   | emulholland@mncenter.org          | Minnesota Center for Environmental Advocacy |                                                                 | 1919 University Ave W Ste 515 Saint Paul                                           | Electronic Service |                           | No                | Official 24-432   |

| #   | First Name | Last Name | Email                            | Organization                        | Agency                                                          | Address                                                                            | Delivery Method    | Alternate Delivery Method | View Trade Secret | Service List Name |
|-----|------------|-----------|----------------------------------|-------------------------------------|-----------------------------------------------------------------|------------------------------------------------------------------------------------|--------------------|---------------------------|-------------------|-------------------|
|     |            |           |                                  |                                     |                                                                 | MN, 55101<br>United States                                                         |                    |                           |                   |                   |
| 175 | Alan       | Muller    | alan@greendel.org                | Energy & Environmental Consulting   |                                                                 | 1110 West Avenue<br>Red Wing<br>MN, 55066<br>United States                         | Electronic Service |                           | No                | Official 24-432   |
| 176 | Kristin    | Munsch    | kmunsch@citizensutilityboard.org | Citizens Utility Board of Minnesota |                                                                 | 309 W. Washington St.<br>Ste. 800<br>Chicago IL, 60606<br>United States            | Electronic Service |                           | No                | Official 24-432   |
| 177 | Travis     | Murray    | travis.murray@ag.state.mn.us     |                                     | Office of the Attorney General - Residential Utilities Division | 445 Minnesota St<br>Ste 1400<br>Saint Paul<br>MN, 55101<br>United States           | Electronic Service |                           | Yes               | Official 24-432   |
| 178 | Amanda     | Myers     | amanda@weavegrid.com             | Weave Grid, Inc.                    |                                                                 | 222 7th Street<br>2nd Floor<br>San Francisco<br>CA, 94103<br>United States         | Electronic Service |                           | No                | Official 24-432   |
| 179 | Mark       | Nabong    | mnabong@nrdc.org                 | Natural Resources Defense Council   |                                                                 | 20 N. Wacker Drive #1600<br>Chicago IL, 60606<br>United States                     | Electronic Service |                           | No                | Official 24-432   |
| 180 | Ben        | Nelson    | benn@cmpasgroup.org              | CMPMA                               |                                                                 | 459 South Grove Street<br>Blue Earth<br>MN, 56013<br>United States                 | Electronic Service |                           | No                | Official 24-432   |
| 181 | Carl       | Nelson    | cnelson@mncee.org                | Center for Energy and Environment   |                                                                 | 212 3rd Ave N<br>Ste 560<br>Minneapolis<br>MN, 55401<br>United States              | Electronic Service |                           | No                | Official 24-432   |
| 182 | David      | Niles     | david.niles@avantenergy.com      | Minnesota Municipal Power Agency    |                                                                 | 220 South Sixth Street<br>Suite 1300<br>Minneapolis<br>MN, 55402<br>United States  | Electronic Service |                           | No                | Official 24-432   |
| 183 | Sephra     | Ninow     | sephra.ninow@energycenter.org    | Center for Sustainable Energy       |                                                                 | 426 17th Street, Suite 700<br>Oakland CA, 94612<br>United States                   | Electronic Service |                           | No                | Official 24-432   |
| 184 | Michael    | Noble     | noble@fresh-energy.org           | Fresh Energy                        |                                                                 | 408 Saint Peter St Ste 350<br>Saint Paul<br>MN, 55102<br>United States             | Electronic Service |                           | No                | Official 24-432   |
| 185 | Rolf       | Nordstrom | rnordstrom@gpsd.net              | Great Plains Institute              |                                                                 | 2801 21ST AVE S STE 220<br>Minneapolis<br>MN, 55407-1229<br>United States          | Electronic Service |                           | No                | Official 24-432   |
| 186 | Samantha   | Norris    | samanthanorris@alliantenergy.com | Interstate Power and Light Company  |                                                                 | 200 1st Street<br>SE PO Box 351<br>Cedar Rapids<br>IA, 52406-0351<br>United States | Electronic Service |                           | No                | Official 24-432   |
| 187 | Christian  | Noyce     | christian.noyce@state.mn.us      |                                     | Public Utilities Commission                                     | 759 Hague Ave<br>St Paul MN, 55104<br>United States                                | Electronic Service |                           | Yes               | Official 24-432   |

| #   | First Name | Last Name    | Email                            | Organization                        | Agency                            | Address                                                                      | Delivery Method    | Alternate Delivery Method | View Trade Secret | Service List Name |
|-----|------------|--------------|----------------------------------|-------------------------------------|-----------------------------------|------------------------------------------------------------------------------|--------------------|---------------------------|-------------------|-------------------|
| 188 | David      | O'Brien      | david.obrien@navigant.com        | Navigant Consulting                 |                                   | 77 South Bedford St<br>Ste 400<br>Burlington<br>MA, 01803<br>United States   | Electronic Service |                           | No                | Official 24-432   |
| 189 | M. William | O'Brien      | bobrien@mojlaw.com               | Miller O'Brien Jensen, P.A.         |                                   | 120 S 6th St<br>Ste 2400<br>Minneapolis<br>MN, 55402<br>United States        | Electronic Service |                           | No                | Official 24-432   |
| 190 | Ric        | O'Connell    | ric@gridlab.org                  | GridLab                             |                                   | 2120 University Ave<br>Berkeley CA,<br>94704<br>United States                | Electronic Service |                           | No                | Official 24-432   |
| 191 | Jeff       | O'Neill      | jeff.oneill@ci.monticello.mn.us  | City of Monticello                  |                                   | 505 Walnut Street<br>Suite 1<br>Monticello<br>MN, 55362<br>United States     | Electronic Service |                           | No                | Official 24-432   |
| 192 | Matthew    | Olsen        | molsen@otpc.com                  | Otter Tail Power Company            |                                   | 215 South Cascade Street<br>Fergus Falls<br>MN, 56537<br>United States       | Electronic Service |                           | No                | Official 24-432   |
| 193 | Russell    | Olson        | rolson@hcpd.com                  | Heartland Consumers Power District  |                                   | PO Box 248<br>Madison SD,<br>57042-0248<br>United States                     | Electronic Service |                           | No                | Official 24-432   |
| 194 | Debra      | Opatz        | dopatz@otpc.com                  | Otter Tail Power Company            |                                   | 215 South Cascade Street<br>Fergus Falls<br>MN, 56537<br>United States       | Electronic Service |                           | No                | Official 24-432   |
| 195 | Nate       | O'Reilly     | nate@iron512.com                 |                                     |                                   | 851 Pierce Butler Route<br>St Paul MN,<br>55104<br>United States             | Electronic Service |                           | No                | Official 24-432   |
| 196 | Carol A.   | Overland     | overland@legalelectric.org       | Legalelectric - Overland Law Office |                                   | 1110 West Avenue<br>Red Wing<br>MN, 55066<br>United States                   | Electronic Service |                           | No                | Official 24-432   |
| 197 | John       | Pacheco      | johnpachecojr@gmail.com          |                                     |                                   | null null, null<br>United States                                             | Electronic Service |                           | No                | Official 24-432   |
| 198 | Greg       | Palmer       | gpalmer@greatermngas.com         | Greater Minnesota Gas, Inc.         |                                   | 1900 Cardinal Ln<br>PO Box 798<br>Faribault MN,<br>55021<br>United States    | Electronic Service |                           | No                | Official 24-432   |
| 199 | Jessica    | Palmer Denig | jessica.palmer-denig@state.mn.us |                                     | Office of Administrative Hearings | 600 Robert St<br>N<br>PO Box 64620<br>St. Paul MN,<br>55164<br>United States | Electronic Service |                           | Yes               | Official 24-432   |
| 200 | Dan        | Patry        | dpatry@sunedison.com             | SunEdison                           |                                   | 600 Clipper Drive<br>Belmont CA,<br>94002<br>United States                   | Electronic Service |                           | No                | Official 24-432   |
| 201 | Jeffrey C  | Paulson      | jeff.jcplaw@comcast.net          | Paulson Law Office, Ltd.            |                                   | 4445 W 77th Street<br>Suite 224<br>Edina MN,<br>55435<br>United States       | Electronic Service |                           | No                | Official 24-432   |



| #   | First Name | Last Name    | Email                           | Organization                          | Agency                                                          | Address                                                                           | Delivery Method    | Alternate Delivery Method | View Trade Secret | Service List Name |
|-----|------------|--------------|---------------------------------|---------------------------------------|-----------------------------------------------------------------|-----------------------------------------------------------------------------------|--------------------|---------------------------|-------------------|-------------------|
| 215 | John       | Reynolds     | john.reynolds@nfib.org          |                                       |                                                                 | 180 5th St E<br>Suite 260<br>St. Paul MN,<br>55101<br>United States               | Electronic Service |                           | No                | Official 24-432   |
| 216 | Whitney    | Richardson   | whitney.richardson@evgo.com     | EVgo Services, LLC                    |                                                                 | 11835 W Olympic Blvd<br>Ste 900E<br>Los Angeles CA, 90064<br>United States        | Electronic Service |                           | No                | Official 24-432   |
| 217 | Noah       | Roberts      | nroberts@cleanpower.org         | Energy Storage Association            |                                                                 | 1155 15th St NW, Ste 500<br>Washington DC, 20005<br>United States                 | Electronic Service |                           | No                | Official 24-432   |
| 218 | Alice      | RobertsDavis | admin.info@state.mn.us          | Department of Administration          |                                                                 | 15 Sherburne Avenue<br>St. Paul MN,<br>55155<br>United States                     | Electronic Service |                           | No                | Official 24-432   |
| 219 | Susan      | Romans       | sromans@allte.com               | Minnesota Power                       |                                                                 | 30 West Superior Street<br>Legal Dept<br>Duulth MN,<br>55802<br>United States     | Electronic Service |                           | No                | Official 24-432   |
| 220 | Amanda     | Rome         | amanda.rome@xcelenergy.com      | Xcel Energy                           |                                                                 | 414 Nicollet Mall FL 5<br>Minneapolis MN, 55401<br>United States                  | Electronic Service |                           | No                | Official 24-432   |
| 221 | Robert K.  | Sahr         | bsahr@eastriver.coop            | East River Electric Power Cooperative |                                                                 | P.O. Box 227<br>Madison SD,<br>57042<br>United States                             | Electronic Service |                           | No                | Official 24-432   |
| 222 | Renee      | Samson       | rsamson@freewiretech.com        | FreeWire Technologies                 |                                                                 | 1999 Harrison St<br>Oakland CA,<br>94612<br>United States                         | Electronic Service |                           | No                | Official 24-432   |
| 223 | Joseph L   | Sathe        | jsathe@kennedy-graven.com       | Kennedy & Graven, Chartered           |                                                                 | 150 S 5th St<br>Ste 700<br>Minneapolis MN, 55402<br>United States                 | Electronic Service |                           | No                | Official 24-432   |
| 224 | Tim        | Schaefer     | thschaef@gmail.com              | Environment MN                        |                                                                 | 211 N 1st St<br>Ste 480<br>Minneapolis MN, 55401<br>United States                 | Electronic Service |                           | No                | Official 24-432   |
| 225 | Kevin      | Schlangen    | kevin.schlangen@co.dakota.mn.us | Dakota County                         |                                                                 | 2800 160th Street West<br>Rosemount MN, 55068<br>United States                    | Electronic Service |                           | No                | Official 24-432   |
| 226 | Jacob J.   | Schlesinger  | jschlesinger@keyesfox.com       | Keyes & Fox LLP                       |                                                                 | 1580 Lincoln St Ste 880<br>Denver CO,<br>80203<br>United States                   | Electronic Service |                           | No                | Official 24-432   |
| 227 | Elizabeth  | Schmiesing   | eschmiesing@winthrop.com        | Winthrop & Weinstine, P.A.            |                                                                 | 225 South Sixth Street<br>Suite 3500<br>Minneapolis MN, 55402<br>United States    | Electronic Service |                           | No                | Official 24-432   |
| 228 | Peter      | Scholtz      | peter.scholtz@ag.state.mn.us    |                                       | Office of the Attorney General - Residential Utilities Division | Suite 1400<br>445 Minnesota Street<br>St. Paul MN,<br>55101-2131<br>United States | Electronic Service |                           | Yes               | Official 24-432   |

| #   | First Name | Last Name      | Email                                | Organization                           | Agency                                 | Address                                                                            | Delivery Method    | Alternate Delivery Method | View Trade Secret | Service List Name |
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| 229 | Kay        | Schraeder      | kschraeder@minnkota.com              | Minnkota Power                         |                                        | 5301 32nd Ave S<br>Grand Forks ND, 58201<br>United States                          | Electronic Service |                           | No                | Official 24-432   |
| 230 | Lori       | Schultz        | lorischultz@minncap.org              | Minnesota Community Action Partnership |                                        | MCIT Building<br>100 Empire Dr Ste 202<br>St. Paul MN, 55103<br>United States      | Electronic Service |                           | No                | Official 24-432   |
| 231 | Christine  | Schwartz       | regulatory.records@xcelenergy.com    | Xcel Energy                            |                                        | 414 Nicollet Mall,<br>MN1180-07-MCA<br>Minneapolis MN, 55401-1993<br>United States | Electronic Service |                           | No                | Official 24-432   |
| 232 | Doug       | Scott          | dscott@gpisd.net                     | Great Plains Institute                 |                                        | 2801 21st Ave Ste 220<br>Minneapolis MN, 55407<br>United States                    | Electronic Service |                           | No                | Official 24-432   |
| 233 | Dean       | Sedgwick       | sedgwick@itascapower.com             | Itasca Power Company                   |                                        | PO Box 455<br>Spring Lake MN, 56680<br>United States                               | Electronic Service |                           | No                | Official 24-432   |
| 234 | Maria      | Seidler        | maria.seidler@dom.com                | Dominion Energy Technology             |                                        | 120 Tredegar Street<br>Richmond VA, 23219<br>United States                         | Electronic Service |                           | No                | Official 24-432   |
| 235 | Timothy    | Sexton         | timothy.sexton@state.mn.us           |                                        | Minnesota Department of Transportation | 395 John Ireland Blvd<br>St. Paul MN, 55155-1899<br>United States                  | Electronic Service |                           | No                | Official 24-432   |
| 236 | Janet      | Shaddix Elling | jshaddix@janetshaddix.com            | Shaddix And Associates                 |                                        | 7400 Lyndale Ave S Ste 190<br>Richfield MN, 55423<br>United States                 | Electronic Service |                           | No                | Official 24-432   |
| 237 | Patricia   | Sharkey        | psharkey@environmentallawcounsel.com | Midwest Cogeneration Association.      |                                        | 180 N LaSalle St<br>Ste 3700<br>Chicago IL, 60601<br>United States                 | Electronic Service |                           | No                | Official 24-432   |
| 238 | Bria       | Shea           | bria.e.shea@xcelenergy.com           | Xcel Energy                            |                                        | 414 Nicollet Mall<br>Minneapolis MN, 55401<br>United States                        | Electronic Service |                           | No                | Official 24-432   |
| 239 | Doug       | Shoemaker      | dougs@charter.net                    | Minnesota Renewable Energy             |                                        | 2928 5th Ave S<br>Minneapolis MN, 55408<br>United States                           | Electronic Service |                           | No                | Official 24-432   |
| 240 | Anne       | Smart          | anne.smart@chargepoint.com           | ChargePoint, Inc.                      |                                        | 254 E Hacienda Ave<br>Campbell CA, 95008<br>United States                          | Electronic Service |                           | No                | Official 24-432   |
| 241 | Amanda     | Smith          | amanda.smith@state.mn.us             |                                        | Minnesota Pollution Control Agency     | 520 Lafayette Rd N<br>St. Paul MN, 55155<br>United States                          | Electronic Service |                           | No                | Official 24-432   |
| 242 | Beth       | Smith          | bsmith@greatermankato.com            | Greater Mankato Growth                 |                                        | 1961 Premier Dr Ste 100<br>Mankato MN, 56001<br>United States                      | Electronic Service |                           | No                | Official 24-432   |
| 243 | Joshua     | Smith          | joshua.smith@sierraclub.org          |                                        |                                        | 85 Second St FL 2                                                                  | Electronic Service |                           | No                | Official 24-432   |

| #   | First Name | Last Name | Email                             | Organization                                     | Agency | Address                                                                                   | Delivery Method    | Alternate Delivery Method | View Trade Secret | Service List Name |
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|     |            |           |                                   |                                                  |        | San Francisco<br>CA, 94105<br>United States                                               |                    |                           |                   |                   |
| 244 | Ken        | Smith     | ken.smith@ever-greenenergy.com    | Ever Green Energy                                |        | 305 Saint Peter St<br>Saint Paul MN, 55102<br>United States                               | Electronic Service |                           | No                | Official 24-432   |
| 245 | Ken        | Smith     | ken.smith@districtenergy.com      | District Energy St. Paul Inc.                    |        | 76 W Kellogg Blvd<br>St. Paul MN, 55102<br>United States                                  | Electronic Service |                           | No                | Official 24-432   |
| 246 | Trevor     | Smith     | trevor.smith@avantenergy.com      | Avant Energy, Inc.                               |        | 220 South Sixth Street<br>Suite 1300<br>Minneapolis MN, 55402<br>United States            | Electronic Service |                           | No                | Official 24-432   |
| 247 | Beth       | Soholt    | bsoholt@cleangridalliance.org     | Clean Grid Alliance                              |        | 570 Asbury Street Suite 201<br>St. Paul MN, 55104<br>United States                        | Electronic Service |                           | No                | Official 24-432   |
| 248 | Anna       | Sommer    | asommer@energyfuturesgroup.com    | Energy Futures Group                             |        | PO Box 692<br>Canton NY, 13617<br>United States                                           | Electronic Service |                           | No                | Official 24-432   |
| 249 | Peggy      | Sorum     | peggy.sorum@centerpointenergy.com | CenterPoint Energy                               |        | 505 Nicollet Mall<br>Minneapolis MN, 55402<br>United States                               | Electronic Service |                           | No                | Official 24-432   |
| 250 | Mark       | Spurr     | mspurr@fvbenergy.com              | International District Energy Association        |        | 222 South Ninth St., Suite 825<br>Minneapolis MN, 55402<br>United States                  | Electronic Service |                           | No                | Official 24-432   |
| 251 | Sky        | Stanfield | stanfield@smwlaw.com              | Shute, Mihaly & Weinberger                       |        | 396 Hayes Street<br>San Francisco CA, 94102<br>United States                              | Electronic Service |                           | No                | Official 24-432   |
| 252 | Jamez      | Staples   | jstaples@renewablenrgpartners.com | Renewable Energy Partners                        |        | 3033 Excelsior Blvd S<br>Minneapolis MN, 55416<br>United States                           | Electronic Service |                           | No                | Official 24-432   |
| 253 | Russ       | Stark     | russ.stark@ci.stpaul.mn.us        | City of St. Paul                                 |        | Mayor's Office<br>15 W. Kellogg Blvd., Suite 390<br>Saint Paul MN, 55102<br>United States | Electronic Service |                           | No                | Official 24-432   |
| 254 | Byron E.   | Starns    | byron.starns@stinson.com          | STINSON LLP                                      |        | 50 S 6th St<br>Ste 2600<br>Minneapolis MN, 55402<br>United States                         | Electronic Service |                           | No                | Official 24-432   |
| 255 | Richard    | Stasik    | richard.stasik@wecenergygroup.com | Minnesota Energy Resources Corporation (HOLDING) |        | 231 West Michigan St - P321<br>Milwaukee WI, 53203<br>United States                       | Electronic Service |                           | No                | Official 24-432   |
| 256 | Kristin    | Stastny   | kstastny@taftlaw.com              | Taft Stettinius & Hollister LLP                  |        | 2200 IDS Center<br>80 South 8th Street<br>Minneapolis MN, 55402<br>United States          | Electronic Service |                           | No                | Official 24-432   |

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|-----|-------------|-------------|-------------------------------|----------------------------------------------------|-----------------------------|---------------------------------------------------------------------|--------------------|---------------------------|-------------------|-------------------|
| 257 | Lindsey     | Stegall     | lindsey.stegall@evgo.com      | EVgo Services, LLC                                 |                             | 11835 W Olympic Blvd Ste 900E Los Angeles CA, 90064 United States   | Electronic Service |                           | No                | Official 24-432   |
| 258 | Cary        | Stephenson  | cstephenson@otpc.com          | Otter Tail Power Company                           |                             | 215 South Cascade Street Fergus Falls MN, 56537 United States       | Electronic Service |                           | No                | Official 24-432   |
| 259 | Scott       | Strand      | sstrand@elpc.org              | Environmental Law & Policy Center                  |                             | 60 S 6th Street Suite 2800 Minneapolis MN, 55402 United States      | Electronic Service |                           | No                | Official 24-432   |
| 260 | James M     | Strommen    | jstrommen@kennedy-graven.com  | Kennedy & Graven, Chartered                        |                             | 150 S 5th St Ste 700 Minneapolis MN, 55402 United States            | Electronic Service |                           | No                | Official 24-432   |
| 261 | Dean        | Taylor      | dtaylor@pluginamerica.org     | Plug In America                                    |                             | 6380 Wilshire Blvd, Suite 1000 Los Angeles CA, 90048 United States  | Electronic Service |                           | No                | Official 24-432   |
| 262 | Hanna       | Terwilliger | hanna.terwilliger@state.mn.us |                                                    | Public Utilities Commission | 121 East 7th Place, Suite 350 Saint Paul MN, 55101 United States    | Electronic Service |                           | Yes               | Official 24-432   |
| 263 | 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                | Official 24-432   |
| 264 | 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                | Official 24-432   |
| 265 | Pat         | Treseler    | pat.jcplaw@comcast.net        | Paulson Law Office LTD                             |                             | 4445 W 77th Street Suite 224 Edina MN, 55435 United States          | Electronic Service |                           | No                | Official 24-432   |
| 266 | Analeisha   | Vang        | avang@mnpower.com             |                                                    |                             | 30 W Superior St Duluth MN, 55802-2093 United States                | Electronic Service |                           | No                | Official 24-432   |
| 267 | Nikhil      | Vijaykar    | nvijaykar@keyesfox.com        | Keyes & Fox LLP                                    |                             | 580 California St 12th Floor San Francisco CA, 94104 United States  | Electronic Service |                           | No                | Official 24-432   |
| 268 | Christopher | Villarreal  | cvillarreal@rstreet.org       | R Street Institute                                 |                             | 1212 New York Ave NW Ste 900 Washington DC, 20005 United States     | Electronic Service |                           | No                | Official 24-432   |
| 269 | Julie       | Voeck       | julie.voeck@nee.com           | NextEra Energy Resources, LLC                      |                             | 700 Universe Blvd Juno Beach FL, 33408 United States                | Electronic Service |                           | No                | Official 24-432   |
| 270 | Amelia      | Vohs        | avohs@mncenter.org            | Minnesota Center for                               |                             | 1919 University Avenue West                                         | Electronic Service |                           | No                | Official 24-432   |

| #   | First Name | Last Name  | Email                                   | Organization                              | Agency | Address                                                                                      | Delivery Method    | Alternate Delivery Method | View Trade Secret | Service List Name |
|-----|------------|------------|-----------------------------------------|-------------------------------------------|--------|----------------------------------------------------------------------------------------------|--------------------|---------------------------|-------------------|-------------------|
|     |            |            |                                         | Environmental Advocacy                    |        | Suite 515<br>St. Paul MN,<br>55104<br>United States                                          |                    |                           |                   |                   |
| 271 | Curt       | Volkman    | curt@newenergy-advisors.com             | Fresh Energy                              |        | 408 St Peter St<br>Saint Paul MN, 55102<br>United States                                     | Electronic Service |                           | No                | Official 24-432   |
| 272 | Dwight     | Wagenius   | dwagenius@gmail.com                     | Minnesota Interfaith Power & Light        |        | 4407 E Lake St<br>Minneapolis MN, 55406<br>United States                                     | Electronic Service |                           | No                | Official 24-432   |
| 273 | Francesca  | Wahl       | fwahl@tesla.com                         | Tesla                                     |        | 3500 Deer Creek Rd<br>Palo Alto CA, 94304<br>United States                                   | Electronic Service |                           | No                | Official 24-432   |
| 274 | Roger      | Warehime   | roger.warehime@owatonnautilities.com    | Owatonna Municipal Public Utilities - Gas |        | 208 S Walnut Ave<br>PO BOX 800<br>Owatonna MN, 55060<br>United States                        | Electronic Service |                           | No                | Official 24-432   |
| 275 | Jenna      | Warmuth    | jwarmuth@mnpower.com                    | Minnesota Power                           |        | 30 W Superior St<br>Duluth MN, 55802-2093<br>United States                                   | Electronic Service |                           | No                | Official 24-432   |
| 276 | Darrell    | Washington | darrell.washington@state.mn.us          |                                           | DOT    | null null, null<br>United States                                                             | Electronic Service |                           | No                | Official 24-432   |
| 277 | Laurie     | Williams   | laurie.williams@sierraclub.org          | Sierra Club                               |        | Environmental Law Program<br>1536 Wynkoop St<br>Ste 200<br>Denver CO, 80202<br>United States | Electronic Service |                           | No                | Official 24-432   |
| 278 | Anthony    | Willingham | anthony.willingham@electrifyamerica.com | Electrify America                         |        | 1950 Opportunity Way<br>Suite 1500<br>Reston VA, 20190<br>United States                      | Electronic Service |                           | No                | Official 24-432   |
| 279 | Justin     | Wilson     | justin.wilson@chargepoint.com           | ChargePoint                               |        | 240 East Hacienda Ave.<br>Campbell CA, 95008<br>United States                                | Electronic Service |                           | No                | Official 24-432   |
| 280 | Joseph     | Windler    | jwindler@winthrop.com                   | Winthrop & Weinstine                      |        | 225 South Sixth Street,<br>Suite 3500<br>Minneapolis MN, 55402<br>United States              | Electronic Service |                           | No                | Official 24-432   |
| 281 | Robyn      | Woeste     | robynwoeste@alliantenergy.com           | Interstate Power and Light Company        |        | 200 First St SE<br>Cedar Rapids IA, 52401<br>United States                                   | Electronic Service |                           | No                | Official 24-432   |
| 282 | Yochi      | Zakai      | yzakai@smwlaw.com                       | SHUTE, MIHALY & WEINBERGER LLP            |        | 396 Hayes Street<br>San Francisco CA, 94102<br>United States                                 | Electronic Service |                           | No                | Official 24-432   |
| 283 | Alicia     | Zaloga     | azaloga@keyesfox.com                    | Keyes & Fox, LLP                          |        | 1155 Kildaire Farm Rd Ste 202-203<br>Cary NC, 27511<br>United States                         | Electronic Service |                           | No                | Official 24-432   |

| #   | First Name  | Last Name | Email                 | Organization                      | Agency | Address                                                               | Delivery Method    | Alternate Delivery Method | View Trade Secret | Service List Name |
|-----|-------------|-----------|-----------------------|-----------------------------------|--------|-----------------------------------------------------------------------|--------------------|---------------------------|-------------------|-------------------|
| 284 | Christopher | Zibart    | czibart@atcllc.com    | American Transmission Company LLC |        | W234 N2000 Ridgeview Pkwy Court Waukesha WI, 53188-1022 United States | Electronic Service |                           | No                | Official 24-432   |
| 285 | Kurt        | Zimmerman | kwz@ibew160.org       | Local Union #160, IBEW            |        | 2909 Anthony Ln St Anthony Village MN, 55418-3238 United States       | Electronic Service |                           | No                | Official 24-432   |
| 286 | Patrick     | Zomer     | pat.zomer@lawmoss.com | Moss & Barnett PA                 |        | 150 S 5th St #1200 Minneapolis MN, 55402 United States                | Electronic Service |                           | No                | Official 24-432   |