

July 11, 2022

Will Seuffert
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
Saint Paul, Minnesota 55101-2147

RE: **Response Comments of the Minnesota Department of Commerce, Division of Energy Resources**
Docket No. G002/M-21-765

Dear Mr. Seuffert:

Attached are the response comments of the Minnesota Department of Commerce, Division of Energy Resources (Department), in the following matter:

In the Matter of the Petition of Northern States Power Company, doing business as Xcel Energy, for Approval of Gas Utilities Infrastructure Cost Rider (GUIC Rider) True-up Report for 2021, Revenue Requirements for 2022, and Revised Adjustment Factors (Petition).

Lisa R. Peterson, Manager, Regulatory Analysis with Xcel Energy filed the Petition on October 29, 2021 and Reply Comments on June 13, 2022.

The Department recommends the Minnesota Public Utilities Commission (Commission) **continue to allow Xcel Energy to recover eligible project costs in its GUIC Rider, with modifications.**

The Department is available to answer any questions the Commission may have in this matter.

Sincerely,

/s/ HOLLY SODERBECK
Financial Analyst

/s/ DANIELLE WINNER
Rates Analyst

HS&DW/ja
Attachment



Before the Minnesota Public Utilities Commission

Response Comments of the Minnesota Department of Commerce
Division of Energy Resources

Docket No. G002/M-21-765

I. INTRODUCTION

[Minnesota Statutes § 216B.1635](#) established the Gas Utility Infrastructure Costs (GUIC) Recovery Rider. Northern States Power Company, doing business as Xcel Energy (Xcel, Xcel Energy or the Company) has filed GUIC recovery requests annually since 2014.

On May 31, 2022, the Minnesota Department of Commerce, Division of Energy Resources (Department) filed [Comments](#) on [Xcel's Petition](#) in the instant Docket.

On June 13, 2022, Xcel Energy filed [Reply Comments](#).

The Department provides limited Response Comments to Xcel's Reply Comments to address the additional information requested from the Company and to summarize our recommendations to the Minnesota Public Utilities Commission (Commission).

II. DEPARTMENT'S POSITION ON REPLY TOPICS

In its June 13, 2022 Reply Comments, the Company covered the following topics:

- Internal Capitalized Costs
- Risk Assessments
- Revenue Requirement Apportionment
- Aligning GUIC Rider with Final Gas Rate Case Decision
- Plan to Wind Down GUIC Rider

The Company also confirmed it will provide a compliance filing within ten days of a Commission Order with a preliminary calculation of its GUIC Rider rate factors, along with a final rate compliance filing after all 2022 actual data is known.¹

¹ Petition, p. 1.

A. INTERNAL CAPITALIZED COSTS

The Department recommended the Company make an adjustment to remove internal capitalized costs from its 2022 GUIC project costs. The Company states it does not believe an additional adjustment is needed, as the Company has already included adjustments to remove the internal capitalized costs for its GUIC projects from 2018 through 2022.²

In its Reply Comments, the Company drew a distinction between internal capitalized costs included in 2022 projects, but later removed the revenue requirement calculation in the amount of \$0.4 million for 2022. Xcel's 2022 capital project costs did not include internal labor, but did include overheads, transportation, and other costs. The overheads, transportation, and other costs make up the \$0.4 million removed from the revenue requirement.

The Department again reviewed the Company's Petition and supplemental information provided through Information Requests. The Department confirms the Company excluded \$0.4 million for GUIC DIMP and TIMP 2022 overheads.³

B. RISK ASSESSMENTS

The Company changed risk assessment metrics in its initial Petition for J-DIMP Mitigated Risk/Foot and TIMP MAOP project risk assessment. The Department asked the Company to explain these changes in Reply Comments.

The Company explained its J-DIMP Mitigated Risk/Foot priority scores compare projects for potential replacement and are unitless.⁴

The Company explained it changed its TIMP MAOP project risk categories from high, medium, low and no risk to high, low, and no risk to align with the risk categories with the Code of Federal Regulations' MAOP remediation requirements.⁵

The Department has no further questions regarding the risk assessment metrics.

² Petition, pp. 3-4.

³ Department Attachment 1.

⁴ Petition, p. 5.

⁵ Petition, pp. 5-6.

C. REVENUE REQUIREMENT APPORTIONMENT

Xcel Energy proposed apportionment changes in its instant Petition. Xcel's proposal combined transportation customers with their respective firm or interruptible sales classes.⁶ In the Department's Comments, the Department supported using apportionment established in a rate case.⁷

In its Reply Comments, the Company provided information from the Company's last approved rate case in Docket No. G002/GR-09-1153. The Company stated, "Both the currently approved GUIC Rider apportionment and the Company's proposed GUIC Rider apportionment in this docket are sourced from the Company's approved revenue apportionment established in the 2010 Rate Case..."⁸

The Company also stated the proposed apportionment is necessary to keep rates uniform between transportation service and sales services classes as the Company incorporates a portion of the GUIC Rider investment into proposed base rates.⁹

According to the Company, the Company's proposed apportionment preserves the rate design goal of being indifferent to a customer's choice of sales service or transportation service and is consistent with the apportionment approach in the Company's open gas rate case (Docket No. G002/GR-21-678).

Given the additional information, the Department does not oppose the Company's proposed apportionment.

D. ALIGNING GUIC RIDER WITH FINAL GAS RATE CASE DECISION

The Department anticipates certain costs within the GUIC Rider will get "rolled into" base rates through the course of Xcel's open General Rate Case (Docket No. G002/GR-21-678). As noted in the Department's Comments, the Department expects the Company to discontinue collecting specific GUIC costs after the costs are rolled into the Company's base rates.¹⁰

In its Reply Comments, Xcel stated the Company's rate case interim rate revenues collected from January 1, 2022 through the effective date of final rates in 2023 do not include recovery of any part of the 2022 GUIC revenue requirement. Recovery of the ongoing revenue requirement for the GUIC Rider roll-in will begin in base rates at the time final rates are effective sometime in 2023.¹¹ Xcel stated, "Recovery for the 2023 GUIC Rider revenue requirement runs from March 1, 2024 through February 28, 2025, so we would incorporate the reduction for the rider roll-in starting March 1, 2024."¹²

⁶ Petition, p. 36.

⁷ Department Comments, pp. 21-22.

⁸ Company Reply Comments, p. 7.

⁹ Company Reply Comments, p. 8.

¹⁰ Department Comments, p. 19.

¹¹ Company Reply Comments, p. 9.

¹² Company Reply Comments, p. 9.

The Department reiterates a corrective adjustment in Xcel's interim rate refund calculation is needed to ensure GUIC rider revenues are not collected twice: once in the 2022 GUIC Rider and again in the interim rate refund calculation, where the first step is to true-up interim rates to final rates. However, the Department also agrees incorporating the rider roll-in should also be done through the 2023 GUIC Rider; for example, the Department expects the Company's cumulative, GUIC-specific "Plant-in-Service" accounts would be reset to zero at the time of the rollover.

E. PLAN TO WIND DOWN GUIC RIDER

Fresh Energy filed Comments in the instant Petition on May 31, 2022 and stated:

Xcel filed its first GUIC rider petition on August 1, 2014. The Company projects that it will spend over \$600 million on GUIC-related projects between 2012 and 2026. And it plans to spend approximately \$60 million per year in 2021 and 2022 on GUIC-related capital investments. This level of annual spending on accelerated replacement is significantly higher today than *all* capital spending in its 2010 rate case. (footnotes omitted)¹³

Fresh Energy requested Xcel file a GUIC wind-down plan in its next GUIC rider petition in its next GUIC rider petition.¹⁴

In its Reply Comments, Xcel responded to Fresh Energy's Comments. Xcel stated it shares Fresh Energy's interest in the decarbonization of the natural gas system and reducing greenhouse gases.¹⁵ The Company continued, "However, decarbonization and greenhouse gas reduction efforts do not eliminate the need to invest in our system as it exists to ensure that we can safely and reliably serve our existing customers."¹⁶ The Company stated the GUIC costs do not include betterment of the Company's natural gas system.¹⁷ Xcel does not support Fresh Energy's request for a wind-down plan, stating:

Fresh Energy's proposal is both unnecessary (seeking information already required to be included in the GUIC, such as timeliness and in-service dates for current GUIC projects) and incompatible with the GUIC (for example, requesting discussions of alternatives to replacement projects when the only projects recoverable under the GUIC are those *required* by a municipality or a federal or state agency).¹⁸

¹³ [Fresh Energy Comments](#), p. 1.

¹⁴ Fresh Energy Comments, p. 2

¹⁵ Company Reply Comments, p. 9.

¹⁶ Company Reply Comments, p. 10.

¹⁷ Company Reply Comments, p. 10.

¹⁸ Company Reply Comments, p. 10.

The Department agrees with Fresh Energy, for purposes of this proceeding, parties should assume the GUIC rider will expire in 2023 in accordance with the statutory sunset. Under such a course of events, Xcel could file a GUIC Rider petition for recovery of 2023 costs in next year's filing; the subsequent year, the Company could simply file a true up of 2023 expenses. In this scenario, the GUIC rider would remain in place for 2024, but would only reflect any 2023 over-or-under recoveries. All post-2023 expenses that might otherwise be recorded in the Company's GUIC tracker would instead simply be moved to its tracker for general rates.

From the Department's understanding, there are two ways in which the GUIC rider may be continued: (1) through legislative action to extend the rider or (2) through Commission action to extend the rider, absent legislative action. As Xcel noted, the Commission has extended at least one rider past its legislative sunset; and as Fresh Energy noted, Xcel's GUIC Rider in Colorado was in place absent legislation. However, the Commission does not need to address this issue in the current proceeding. Since 2023 is the last year for which the rider can recover eligible costs, this decision may be deferred until next year's filing, if the Commission wishes. Deferring the decision until next year would also allow the Commission to wait and see if the legislature approves extension of the rider.

Ultimately, while the Department agrees we should assume the rider sunsets in 2023, it's unclear whether an official wind-down plan is necessary. As long as parties agree about the general timing and mechanisms of the rider's sunset, the Department does not recommend the Commission take any action at this time.

F. GUIC ALTERNATIVES ASSESSMENT

In its Comments, Fresh Energy also proposed the Company implement some type of gas alternatives assessment tool. Such a tool would evaluate whether better alternatives, such as electrification or conversion to biogas, may be more cost effective than replacement of natural gas assets. The rationale for this proposal is that simply replacing all natural gas assets without regard to some type of broader natural gas planning might not actually serve to further the state's carbon emissions goals and could result in stranded assets. Fresh Energy noted Xcel's GUIC Rider was discontinued in Colorado because of these concerns. Fresh Energy did not propose a specific tool for such an evaluation, but proposed the idea more generally.

The Department agrees more comprehensive planning for natural gas assets is a critical way to further the state's greenhouse gas goals and keep ratepayer expenses low. However, the Department does not think the current docket is the place to develop such planning tools. As noted above, the Department assumes the rider expires in 2023. Further, this topic applies to all gas infrastructure in Minnesota, not simply that owned and operated by Xcel Gas. The development of such a tool is also more planning-oriented, rather than rate-recovery-oriented; as such, the development and implementation of such a tool should be in a planning-oriented docket. Finally, as Fresh Energy does not propose a specific tool for evaluating gas alternatives, it's unclear exactly what the Commission would be approving.

Instead, the Department recommends this topic be addressed in the “future of gas” docket, Docket G999/CI-21-595. Should a gas alternatives evaluation tool be developed and approved in that docket and should the GUIC Rider be extended past its current sunset date (either through legislative or Commission action), the Commission may then wish to incorporate such a tool in the GUIC rider proceedings. The Commission may also wish to consider discussing other gas asset planning tools used in the GUIC proceedings—such as risk assessment and performance metrics—in the future of gas docket.

III. FOUR ADJUSTMENTS TO INITIAL REVENUE REQUIREMENT REQUEST

In its Comments, the Department requested the Commission require the removal of costs from the H005 and Rah Lateral IP Line projects and require removal of the equity return on TIMP programmatic Replacement/MAOP Remediation projects.

In its Reply Comments, Xcel made four adjustments to its initial revenue requirement request. The Company quantified the impact of removing the H005 and Rahr Lateral IP Line projects. The Company also removed the GUIC Retirement Revenue Credits adjustment and the adjustment to remove amounts recovered in base rates.¹⁹ The Company stated these adjustments are no longer needed due to new interim rates implemented January 1, 2022. The Company notes the Department’s requested adjustments for internal capitalized costs and equity return on TIMP Programmatic Replacement/MAOP Remediation project are not required as the Company already included those adjustments in its revenue requirement.²⁰

Table 1 provides the Company’s adjusted 2022 Revenue Requirement.

Table 1: Adjusted 2022 Revenue Requirement Summary²¹

Operations & Maintenance Expenses	778,843
Capital-Related Revenue Requirement	34,600,354
<u>Regulatory Treatment</u>	
GUIC Retirement Revenue Credits	(815,408)
Revenue Requirement in Base Rates	(846,937)
<u>Other Disallowances</u>	
2018-2021 Internal Capitalized Costs	(4,083,539)
2022 Internal Capitalized Costs	(439,164)
Removal of Low-risk Infrastructure Costs	(38,560)
Prog. Repl./MAOP Projects Limited to LT Debt Rate	(1,712,106)
Other Project Overrun Disallowances	<u>(162,854)</u>

¹⁹ From the Department’s understanding, the “GUIC Retirement Revenue Adjustment” is specific to capital, whereas the “Recovery in Base Rates Adjustment” is specific to O&M.

²⁰ Company Reply Comments, pp. 2-3.

²¹ Company Reply Comments, p. 3.

Total Other Disallowances	(6,436,223)
Revenue Requirement as Filed	27,280,630
<u>Reply Comments Adjustments</u>	
Remove Rahr Lateral Indirect Survey Costs	(46,000)
Remove H005 Replacement Expenditures	(79,646)
Remove GUIC Retirement Revenue Adjustment	846,937
Remove Recovery in Base Rates Adjustment	815,408
Total Reply Comments Adjustments	1,536,699
Adjusted 2022 Revenue Requirement	28,817,329

The Department agrees it is appropriate to remove the GUIC Retirement Revenue Adjustment and the Recovery in Base Rates Adjustment, provided no projects included in the instant filing replace assets included in interim rates. If any assets included in interim rates were replaced through the GUIC Rider, Xcel should calculate a new adjustment to include in the Adjusted 2022 Revenue Requirement.

The Department therefore recommends the Commission approve Xcel’s proposed Adjusted 2022 Revenue Requirement, including adjustments for any assets reflected in interim rates and replaced in the current GUIC filing.

IV. DEPARTMENT CONCLUSIONS AND RECOMMENDATIONS

Based on our review, the Department concludes Xcel’s Petition is generally reasonable.

Therefore, the Department recommends the Commission approve the Company’s adjusted, proposed 2022 GUIC Rider factor, with the following modifications:

- Allow Xcel to update the base rate recovery offset inputs to the 2022 rider revenue requirement once actual 2020 and 2021 retirements are known, and direct Xcel to include the corresponding schedules for each cost offset category amount;
- Allow Xcel to update its 2021 GUIC Rider true-up carryover once actual costs are known;
- Allow Xcel to use its proposed Adjusted 2022 Revenue Requirement, adjusted for any assets reflected in interim rates and replaced in the current GUIC filing;
- Direct Xcel Energy to provide electronic files with all formulae intact, of the revenue requirement and corresponding rate factor schedules, based on Commission decisions, in any preliminary rate, within 10 days of the Commission Order and in its final rate calculation compliance filings.

Further, the Department recommends once the future of gas docket proceedings have commenced, the Commission should request comments on the development of a gas alternatives evaluation tool, as well as on ways to use risk assessment and performance metrics tools for gas planning in Minnesota.

NSPM Rider Final Tracker by Sub Project	2020	2021	2022	2023	2024	2025	2026
Rider Revenue Requirement							
Miscellaneous Items							
Base Rates							
Base Rates	(480,000)	(480,000)	(480,000)	(480,000)	(480,000)	(480,000)	(480,000)
GUIC DIMP - Mandatory Relocates in Base Rates		(366,937)	(366,937)	(366,937)	(366,937)	(366,937)	(366,937)
Regulatory Treatment							
GUIC DIMP - 2018 exclude Overheads	(813,041)	(814,067)	(\$797,357)	(778,289)	(759,891)	(742,115)	(724,493)
GUIC DIMP - 2019 exclude Overheads FINAL	(712,831)	(712,948)	(\$697,960)	(681,004)	(664,668)	(648,909)	(633,683)
GUIC DIMP - 2020 exclude Overheads	(295,759)	(865,095)	(\$846,472)	(825,581)	(805,485)	(786,127)	(767,454)
GUIC DIMP - 2021 exclude Overheads		(196,734)	(\$555,602)	(541,671)	(528,288)	(515,417)	(503,020)
GUIC DIMP - 2022 exclude Overheads			(197,196)	(555,576)	(541,641)	(528,258)	(515,388)
GUIC DIMP - Forecast exclude Overheads				(197,199)	(752,775)	(1,294,416)	(1,822,674)
GUIC MAOP Project - limit return on capital costs to long-term debt rate	(569,929)	(1,756,630)	(1,712,106)	(1,837,158)	(2,221,485)	(2,644,669)	(3,028,383)
GUIC Removal of costs related to low-risk infrastructure	144	(7,807)	(38,560)	(68,524)	(97,747)	(126,259)	(154,080)
GUIC Remove \$371k Sewer Inspection in Base Rates							
GUIC Remove \$50k Sewer Inspection in Base Rates							
GUIC Retirement Credit - As Filed	(695,218)	(703,999)	(815,408)				
GUIC Retirement Credit - Update	70,000						
GUIC TIMP - 2018 exclude Overheads	(159,517)	(155,505)	(\$153,831)	(150,303)	(146,904)	(143,516)	(140,125)
GUIC TIMP - 2019 exclude Overheads FINAL	(163,781)	(159,450)	(\$157,501)	(153,724)	(150,194)	(146,795)	(143,407)
GUIC TIMP - 2020 exclude Overheads	(105,645)	(193,972)	(\$191,303)	(186,501)	(182,023)	(177,841)	(173,813)
GUIC TIMP - 2021 exclude Overheads		(238,975)	(\$683,513)	(665,573)	(648,875)	(633,309)	(618,772)
GUIC TIMP - 2022 exclude Overheads			(241,968)	(683,330)	(665,380)	(648,683)	(633,117)
GUIC TIMP - Forecast exclude Overheads				(241,973)	(925,302)	(1,590,683)	(2,239,365)
GUIC TIMP - Island Line South - exclude \$1.5M cost overrun	(168,889)	(164,630)	(\$162,854)	(159,109)	(155,501)	(151,906)	(148,307)
Total Regulatory Treatment	(4,094,466)	(6,816,748)	(8,098,568)	(8,572,452)	(10,093,096)	(11,625,839)	(13,093,018)
	(2,989,248)	(5,265,812)					

2018 - 2021 DIMP exclude overheads and 2018 - 2021
 (\$4,246,393) TIMP exclude overheads and cost overrun
 (\$439,164) 2022 DIMP and TIMP exclude overheads

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
Response Comments**

Docket No. G002/M-21-765

Dated this **11th** day of **July 2022**

/s/Sharon Ferguson

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Alison C	Archer	aarcher@misoenergy.org	MISO	2985 Ames Crossing Rd Eagan, MN 55121	Electronic Service	No	OFF_SL_21-765_M-21-765
Mara	Ascheman	mara.k.ascheman@xcelenergy.com	Xcel Energy	414 Nicollet Mall Fl 5 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_21-765_M-21-765
Gail	Baranko	gail.baranko@xcelenergy.com	Xcel Energy	414 Nicollet Mall 7th Floor Minneapolis, MN 55401	Electronic Service	No	OFF_SL_21-765_M-21-765
John	Coffman	john@johncoffman.net	AARP	871 Tuxedo Blvd. St. Louis, MO 63119-2044	Electronic Service	No	OFF_SL_21-765_M-21-765
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-765_M-21-765
Brooke	Cooper	bcooper@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022191	Electronic Service	No	OFF_SL_21-765_M-21-765
George	Crocker	gwillc@nawo.org	North American Water Office	PO Box 174 Lake Elmo, MN 55042	Electronic Service	No	OFF_SL_21-765_M-21-765
Rebecca	Eilers	rebecca.d.eilers@xcelenergy.com	Xcel Energy	414 Nicollet Mall - 401 7th Floor Minneapolis, MN 55401	Electronic Service	No	OFF_SL_21-765_M-21-765
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 551012198	Electronic Service	No	OFF_SL_21-765_M-21-765
Edward	Garvey	garveyed@aol.com	Residence	32 Lawton St Saint Paul, MN 55102	Electronic Service	No	OFF_SL_21-765_M-21-765

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Edward	Garvey	edward.garvey@AESLconsulting.com	AESL Consulting	32 Lawton St Saint Paul, MN 55102-2617	Electronic Service	No	OFF_SL_21-765_M-21-765
Todd J.	Guerrero	todd.guerrero@kutakrock.com	Kutak Rock LLP	Suite 1750 220 South Sixth Street Minneapolis, MN 554021425	Electronic Service	No	OFF_SL_21-765_M-21-765
Matthew B	Harris	matt.b.harris@xcelenergy.com	XCEL ENERGY	401 Nicollet Mall FL 8 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_21-765_M-21-765
Annete	Henkel	mui@mnuutilityinvestors.org	Minnesota Utility Investors	413 Wacouta Street #230 St. Paul, MN 55101	Electronic Service	No	OFF_SL_21-765_M-21-765
Michael	Hoppe	lu23@ibew23.org	Local Union 23, I.B.E.W.	445 Etna Street Ste. 61 St. Paul, MN 55106	Electronic Service	No	OFF_SL_21-765_M-21-765
Richard	Johnson	Rick.Johnson@lawmoss.com	Moss & Barnett	150 S. 5th Street Suite 1200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-765_M-21-765
Sarah	Johnson Phillips	sarah.phillips@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-765_M-21-765
Peder	Larson	plarson@larkinhoffman.com	Larkin Hoffman Daly & Lindgren, Ltd.	8300 Norman Center Drive Suite 1000 Bloomington, MN 55437	Electronic Service	No	OFF_SL_21-765_M-21-765
Eric	Lipman	eric.lipman@state.mn.us	Office of Administrative Hearings	PO Box 64620 St. Paul, MN 551640620	Electronic Service	Yes	OFF_SL_21-765_M-21-765
Ryan	Long	ryan.j.long@xcelenergy.com	Xcel Energy	414 Nicollet Mall 401 8th Floor Minneapolis, MN 55401	Electronic Service	No	OFF_SL_21-765_M-21-765

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Pam	Marshall	pam@energycents.org	Energy CENTS Coalition	823 7th St E St. Paul, MN 55106	Electronic Service	No	OFF_SL_21-765_M-21-765
Mary	Martinka	mary.a.martinka@xcelenergy.com	Xcel Energy Inc	414 Nicollet Mall 7th Floor Minneapolis, MN 55401	Electronic Service	No	OFF_SL_21-765_M-21-765
David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022093	Electronic Service	No	OFF_SL_21-765_M-21-765
Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP	33 South Sixth St Ste 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-765_M-21-765
David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency	220 South Sixth Street Suite 1300 Minneapolis, Minnesota 55402	Electronic Service	No	OFF_SL_21-765_M-21-765
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_21-765_M-21-765
Amanda	Rome	amanda.rome@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 5 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_21-765_M-21-765
Richard	Savelkoul	rsavelkoul@martinsquires.com	Martin & Squires, P.A.	332 Minnesota Street Ste W2750 St. Paul, MN 55101	Electronic Service	No	OFF_SL_21-765_M-21-765
Christine	Schwartz	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	Yes	OFF_SL_21-765_M-21-765
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th PI E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-765_M-21-765

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
James M	Strommen	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered	150 S 5th St Ste 700 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-765_M-21-765