



414 Nicollet Mall  
Minneapolis, MN 55401

January 27, 2021

—Via Electronic Filing—

Will Seuffert  
Executive Secretary  
Minnesota Public Utilities Commission  
121 7<sup>th</sup> Place East, Suite 350  
St. Paul, MN 55101-2147

RE: REPLY COMMENTS, SHERCO UNIT 3 OUTAGE  
DOCKET NO. E999/AA-18-373  
DOCKET NO. E999/AA-17-492  
DOCKET NO. E999/AA-16-523  
DOCKET NO. E999/AA-14-579  
DOCKET NO. E002/GR-13-868  
DOCKET NO. E999/AA-13-599  
DOCKET NO. E002/GR-12-961

Dear Mr. Seuffert:

Northern States Power Company, doing business as Xcel Energy, submits these REPLY COMMENTS in response to the Public Utilities Commission's NOTICE OF EXTENDED COMMENT PERIOD issued on November 10, 2020.

We have electronically filed this document with the Minnesota Public Utilities Commission, and copies have been served on the parties on the attached service lists. Please contact me at [ryan.j.long@xcelenergy.com](mailto:ryan.j.long@xcelenergy.com) or 612-215-4659 or Martha Hoschmiller at [martha.e.hoschmiller@xcelenergy.com](mailto:martha.e.hoschmiller@xcelenergy.com) or 612-330-5973 if you have any questions regarding this filing.

Sincerely,

/s/

RYAN J. LONG  
MANAGING ATTORNEY

c: Service List

STATE OF MINNESOTA  
BEFORE THE  
MINNESOTA PUBLIC UTILITIES COMMISSION

Katie J. Sieben	Chair
Valerie Means	Commissioner
Matthew Schuerger	Commissioner
Joseph K. Sullivan	Commissioner
John A. Tuma	Commissioner

IN THE MATTER OF THE APPLICATION  
OF NORTHERN STATES POWER  
COMPANY FOR AUTHORITY TO  
INCREASE RATES FOR ELECTRIC  
SERVICE IN THE STATE OF MINNESOTA

DOCKET No. E002/GR-12-961

IN THE MATTER OF THE APPLICATION  
OF NORTHERN STATES POWER  
COMPANY FOR AUTHORITY TO  
INCREASE RATES FOR ELECTRIC  
SERVICE IN THE STATE OF MINNESOTA

DOCKET No. E002/GR-13-868

IN THE MATTER OF NORTHERN STATES  
POWER COMPANY'S ANNUAL  
AUTOMATIC ADJUSTMENT OF CHARGES  
REPORT FOR ITS ELECTRIC OPERATION  
(2012-2013; 2013-2014; 2015-2016; 2016-  
2017; AND 2017-2018)

DOCKET NOS. E999/AA-13-599  
E999/AA-14-579  
E999/AA-16-523  
E999/AA-17-492  
E999/AA-18-373

**REPLY COMMENTS**

**INTRODUCTION**

Northern States Power Company, doing business as Xcel Energy (Xcel Energy or the Company), submits to the Minnesota Public Utilities Commission this Reply to the January 15, 2021 Comments of the Minnesota Department of Commerce, Division of Energy Resources (the Department), and the January 15, 2021, Comments of the Office of the Attorney General – Residential Utilities Division (OAG) filed in the above-noted dockets.

In November 2011, Unit 3 of the Sherburne County Generating Station (Sherco 3) experienced a catastrophic event precipitated by hidden fractures in the pinned blade

attachments of one of the low-pressure turbines. This caused several of the blades to dislodge from the rotor during a mandatory high-speed test of the turbine following a planned outage. An explosion-like event on the turbine floor resulted that substantially destroyed Sherco 3's two low-pressure turbines, its high and intermediate-pressure turbines, and the generator. It also resulted in significant damage to the control room and other facilities at the plant due to flying debris and fire. We remain incredibly grateful that no one was injured. The event and extended outage that followed were nevertheless a challenging time for the Company, the plant employees, and our regulators. Since that time, the Company has worked diligently to restore the plant to service and maximize its collection of proceeds from various insurers and the turbine manufacturer, General Electric (GE).

The Commission has reviewed the Sherco 3 accident numerous times. Initially, the Commission required the Company to remove all direct Sherco 3 costs, except property taxes, from the test year in its 2012 rate case and defer depreciation expense until the next case.<sup>1</sup> This amounted to a disallowance of approximately \$21.6 million and reflected the Commission's decision that the plant had not been "used and useful" during the extended outage and the test year of that case. In making this determination, the Commission also considered "ratepayers' payment of substantial O&M and replacement-power costs during the outage."<sup>2</sup> Subsequently, the Commission appropriately ordered the Company to use insurance proceeds to offset rate base in the 2013 rate case and refund settlement proceeds to customers.<sup>3</sup> Finally, in the 2013 rate case and then in later Electric Annual Automatic Adjustment (AAA) Report proceedings, the Commission elected to defer any final determination regarding the recoverability of replacement power costs pending the conclusion of litigation between the Company, its insurers, and GE.<sup>4</sup>

The litigation between GE and the Company's insurer, Aegis Insurance (Aegis), has now concluded, and the Commission has sought comments on the appropriate next steps in considering the replacement power costs. Although the trial against GE involved evidence relevant to the accident, the focus of the litigation was GE's alleged gross negligence and fraud—and not Xcel Energy's prudence. Indeed, the Company was *not even a party* to the litigation at the time of trial, having reached a settlement with

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<sup>1</sup> *Findings of Fact, Conclusions, and Order*, Docket No. E-002/GR-12-961 (Sept. 3, 2013) at 22-23.

<sup>2</sup> *Id.*

<sup>3</sup> *Order Reopening, Clarifying and Supplementing May 8, 2015 Order*, Docket No. E-002/GR-13-868 (Aug. 31, 2015); *Order Authorizing Sherco Unit 3 Ratepayer Refund Amount and Method and Requiring Compliance Filing*, Docket Nos. E-002/GR-12-961, E-002/GR-13-868, E-999/AA-13-599, E-999/AA-14-579, E-999/AA-16-523, E-999/AA-17-492, E-999/AA-18-373 (Apr. 11, 2019).

<sup>4</sup> See, e.g., *Order Acting on Utilities' Annual Reports and Requiring Additional Filings*, Docket Nos. E-999/CI-03-802, E-999/AA-12-757, E-999/AA-13-599, E-999/AA-14-579 (June 2, 2016).

GE weeks earlier in September of 2018. As a result, the jury finding lacks a thorough examination of whether the decisions made by the Company were reasonable based on what it knew leading up to the outage event, rather than in reliance on hindsight. These critical questions of prudence were therefore never fully addressed at the trial, much less resolved, and are not a part of the record.

The Department and the OAG, however, point to the jury finding in the trial as the basis for a \$17 million refund by the Company.<sup>5</sup> As discussed throughout these Reply Comments, the Commission should reject these recommendations. The Commission has already disallowed more than \$21 million in costs as a result of the Sherco 3 outage, and that disallowance resulted from taking the plant out of rate base during the outage period because the Commission determined it was not used and useful. Having done so, the Commission should not also require the Company to reimburse customers for replacement power costs that were incurred because the plant was out of service. We therefore believe the Commission can and should determine that Xcel Energy already incurred a sufficient disallowance for the 2011 outage and that no further reimbursement of replacement power costs is required in this docket because customers were not incurring any direct costs associated with the plant while it was out of service (and rate base) during the outage period.

To the extent the Commission disagrees, however, it should undertake its own investigation and fact-finding, and then apply its specialized knowledge to determine whether the Company acted prudently in connection with the Sherco 3 outage. The events leading to the Sherco 3 accident were due to extraordinary circumstances and manufacturing defects that could not have been anticipated by the Company. In the days, months, and years prior to the accident, the Company acted prudently in its operation and management of the facility. It maintained the unit in accordance with industry standards and GE's published guidelines, and it had no reason to believe that the multi-week and multi-million-dollar disassembly and inspection of the turbine that would have uncovered the fractures was required to ensure its safe operation. In fact, GE never stated that such inspections should have been conducted on a routine basis for plants like Sherco 3 until 2013 (two years after the event). Moreover, GE's after-the-fact determination that such inspections *were necessary* was never presented to the jury at trial because it was deemed inadmissible as a "subsequent remedial measure."<sup>6</sup> This underscores the significant differences between a narrow trial on a third party's

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<sup>5</sup> The jury finding the Department relies upon had no bearing on the trial. Indeed, the judge in that trial explicitly found that the jury verdict apportioning fault to Xcel Energy was "legally irrelevant" because only GE's gross negligence was actually at issue in the trial.

<sup>6</sup> Under Minnesota Rule of Evidence 407, "subsequent remedial measures" or measures that, "if taken previously, would have made [an] event less likely to occur" are "not admissible to prove negligence, culpable conduct, a defect in a product, a defect in a product's design, or a need for a warning or instruction."

civil liability versus a broader investigation into the Company's prudence that considers all relevant evidence and allows the Company to present its own evidence and respond to allegations asserted against it.

In short, we firmly believe that the Company and its employees acted prudently before, during, and after the catastrophic event that occurred at Sherco 3 in November of 2011. And, if the Commission believes additional disallowances or reimbursements require consideration in this docket, we are prepared to prove it. Pursuant to Minn. R. 7829.1000, a matter must be referred to the Office of Administrative Hearings (OAH) "if the commission finds that all significant issues have not been resolved to its satisfaction." Because significant issues remain, the Company respectfully requests the Commission refer this matter to the OAH for an investigation into the prudence of the Company's actions.

### **REPLY**

Following the conclusion of proceedings in the Sherco 3 litigation between GE and the Company's insurer, the Commission sought comments on the following questions:<sup>7</sup>

- How should the Commission proceed regarding the issue of [Xcel]'s prudence, recoverability of costs related to the accident, and ratemaking treatment of replacement power and additional fuel costs?
- What further procedural steps, if any, do the parties recommend?

The Department and the OAG ask the Commission to rely on the findings of a jury in a trial about the liability of GE for fraud and gross negligence as conclusive evidence of imprudence by Xcel Energy. And they ask the Commission to order a refund of \$17 million on that basis alone. There is no justification for doing so.

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<sup>7</sup> The Commission also asked whether the Company provided the required compliance information related to the Sherco 3 accident and whether the Company should be authorized to discontinue providing quarterly litigation updates. The Department and the OAG agree that the Company's compliance filing should be accepted and that the litigation update compliance filings can be discontinued. Therefore, the only issue in dispute is how to proceed regarding the issue of the Company's prudence.

**A. The Commission Has Already Imposed a Substantial Disallowance for the Sherco 3 Outage and Should Not Impose Additional Disallowances of Require Reimbursement of Replacement Power Costs.**

In the Company's 2012 rate case, the Commission required the Company to remove all direct Sherco 3 costs, except property taxes, from the test year and defer depreciation expense until the next case.<sup>8</sup> This amounted to a disallowance of approximately \$21.6 million and reflected the Commission's decision that the plant had not been "used and useful" during the extended outage and the test year of that case. In doing so, the Commission explicitly took into account "ratepayers' payment of substantial O&M and replacement-power costs during the outage."<sup>9</sup> In other words, the Commission determined that it was not just and reasonable for customers to pay both the revenue requirement associated with Sherco 3 during the outage *and also* the replacement power costs and O&M that were necessary because of the outage and because the plant was not—in the Commission's judgment—used and useful during this period.

Having made this determination and imposed the substantial disallowance in the Company's 2012 rate case, we do not believe it is appropriate for the Commission to impose an additional penalty in the form of reimbursed replacement power costs. And for this reason, we believe the Commission can and should reject the Department's and OAG's recommendations outright. Should the Commission disagree, however, we believe additional fact-finding and legal analysis—in the form of a contested case—is critical. And the balance of these comments focuses on this need for additional record development and actual findings of fact and conclusions of law related to prudence.

**B. Significant Issues Have Not Been Resolved, and, Therefore, An Investigation into Prudence is Required Before Any Additional Disallowance or Reimbursement is Ordered**

Although the trial between GE and Aegis involved matters related to plant operations and maintenance, the record concerning prudence was not fully developed. As discussed in our August 24, 2020 Compliance filing, Xcel Energy settled with GE, and thus was not a party to the litigation at the time of trial. The trial was between GE and Aegis, and the primary issues were whether *GE* was grossly negligent or committed fraud. Therefore, as an absent party, the Company did not have the opportunity to make arguments, present evidence, or otherwise direct the prosecution

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<sup>8</sup> *Findings of Fact, Conclusions, and Order*, Docket No. E-002/GR-12-961 (Sept. 3, 2013) at 22-23.

<sup>9</sup> *Id.*

of claims. Furthermore, Aegis's trial strategy was dictated by its own interests to portray GE as liable rather than defending Xcel Energy's business decisions. In other words, Aegis had no financial interest in demonstrating Xcel Energy's reasonableness, so long as it could prove that GE acted with gross negligence or committed fraud. As such, the Company never had the opportunity to demonstrate at trial that it operated and maintained the plant in a prudent fashion, consistent with industry standards and in compliance with all GE guidelines.

Historically, the Commission has not required refunds in AAA proceedings where the prudence of underlying activities was not fully determined. And rightly so. In previous circumstances where the Department has recommended refunds, the Commission has declined to do so without a sufficient factual record. For example, in its *Order Acting on Electric Utilities' Annual Reports*, Docket No. E-999/AA-11-792, (Aug. 16, 2013), the Commission stated:

The record in this docket does not contain detail sufficient for the Commission to resolve disputes of fact necessary to finally determine the prudence of the utilities' plant operation and maintenance.<sup>10</sup>

Consistent with this precedent, in connection with the AAA Reports for July 2018–December 2019, rather than accept the Department's recommendation that Minnesota Power reimburse ratepayers for some portion of its forced outage costs, the Commission referred the matter to the OAH for a contested case, stating:

[T]he Commission finds a genuine issue of material fact in dispute about whether Minnesota Power's forced outage costs for the period were reasonable and prudent—and, if not, the amount of overcharges (plus interest) that should be returned to ratepayers through the FCA.<sup>11</sup>

The cases cited by the OAG as support for a utility being required to refund replacement power costs because of failures to exercise reasonable care in its management and operation of its facilities also are consistent with this precedent.<sup>12</sup> A close examination of the cases cited by the OAG reveals that the decision to refund replacement power costs came *after* extensive Commission investigations into prudence.

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<sup>10</sup> Docket No. E-999/AA-11-792, Order at 5.

<sup>11</sup> *Order Accepting 2018-2019 Electric AAA Reports; Notice of and Order for Hearing*, Docket No. E-999/AA-20-171 (Sept. 16, 2020), at 4.

<sup>12</sup> OAG Comments at 26 n.116.

For example, in *Re Consol. Edison Co. of N.Y, Inc.*, before ordering the refund of replacement power costs, the New York State Public Service Commission (New York Commission) instituted a proceeding to investigate the prudence of the utility's actions leading to an outage and referred the matter to an Administrative Law Judge to further explore those issues.<sup>13</sup> The New York Commission recognized that "errors or mistakes of [a utility's] employees do not necessarily constitute imprudence on [the utility's] part."<sup>14</sup> Importantly, the Court observed that a finding of imprudence "turns on the particular facts and circumstances of the case."<sup>15</sup> To guide this inquiry, the factfinder should assess "how reasonable people would have responded to the circumstances . . . wholly apart from what we now know [they] should have done."<sup>16</sup> After a comprehensive investigation comprising fifteen days of hearings and 3,214 pages of written material including 109 exhibits, the Administrative Law Judge found a lack of reasonable care on the part of the Consolidated Edison's management and operation that led to the outage.<sup>17</sup> The New York Commission then ordered a refund.<sup>18</sup>

Similarly, in *Pennsylvania Pub. Utility Comm'n v. Philadelphia Elec. Co.*, the Pennsylvania Public Utility (Pennsylvania Commission) conducted an investigation into the prudence of the company's actions leading to the outage.<sup>19</sup> Only after that investigation resulted in a finding of imprudence did the Pennsylvania Commission order a refund.<sup>20</sup>

Here, the jury's determinations in the litigation between GE and Aegis are not a substitute for an investigation by the Commission. Courts have held that findings in one proceeding cannot form the basis of an imprudence finding in a cost-recovery proceeding. For example, in *Florida Power Corp. v. Florida Pub. Service Comm'n*, the Commission relied on safety investigation reports from the Nuclear Regulatory Commission as the basis for finding imprudence.<sup>21</sup> On appeal, the Court reversed and remanded concluding that the NRC's reports "involved a very different risk and much higher standard of care than was applicable to the Commission's cost-recovery determination."

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<sup>13</sup> 45 P.U.R.4th 325, 325 (1982).

<sup>14</sup> *Id.* at 344.

<sup>15</sup> *Id.*

<sup>16</sup> *Id.* at 332.

<sup>17</sup> *Id.* at 335.

<sup>18</sup> *See generally id.*

<sup>19</sup> 561 A.2d 1224 (1989).

<sup>20</sup> *See generally id.*

<sup>21</sup> 424 So. 2d 745 (1982); *Florida Power Corp. v. Florida Pub. Service Comm'n.*, 456 So. 2d 451 (1984).



The same reasoning applies here with greater force. The Department and the OAG's use of the record in the litigation between GE and Aegis bolsters the need for further record development on prudence. Not only does the OAG rely primarily on GE's appellate advocacy as though it were findings of fact—citing to GE's appellate brief over 70 times, and relying on it almost exclusively as support for the alleged “factual determinations” of the litigation rather than recognizing the document for what it was: advocacy supporting GE's side of the story. In other words, both the OAG and the Department focus on arguments rather than conclusive findings of fact. For example, they both rely on the trial testimony of Company employees as evidence that Xcel Energy knew of certain risks that posed dangers to Sherco 3. But employees' knowledge of risks does not equate to a finding of imprudence on the part of the Company. Critically, it does not show that the Company failed to prudently manage the plant, follow industry standards, and appropriately balance both risks and costs. Those factual questions have not been addressed, much less resolved.

Indeed, numerous questions remain unresolved regarding Xcel Energy's prudence. For example, the OAG argues that the Company should have purchased business interruption insurance to cover the cost of replacement fuel and, by not doing so, customers will be forced to subsidize the catastrophe.<sup>22</sup> However, in 1977, when Xcel Energy executed the contract with GE, it made the business decision not to purchase business interruption insurance. That business decision—which is consistent with industry standards as well as the practices of other Minnesota-based utilities—was based on many factors including risk and cost. No analysis has been performed by the OAG or the Commission regarding whether Xcel Energy's decisions on balancing risks and costs were reasonable based on what the Company knew at the time. Similarly, no analysis has been performed on whether the Company's operational procedures, training, monitoring, controls, and quality assurance processes justified its decisions on how best to maintain the turbine, whether to defer an inspection, and how to handle water chemistry. Likewise, no evidence exists that satisfactorily resolves these issues.

The evidence admitted at trial, moreover, was limited by the rules of evidence for Minnesota Courts, as specifically applied to the dispute between GE and Aegis. These limitations, although appropriate for the civil trial, leave the record lacking for a determination of prudence. For example, in 2013, based on information it had learned in the industry about the turbines, GE modified its maintenance guidelines for plants like Sherco 3 to include multi-million-dollar inspections of its turbines every twenty years to inspect for stress corrosion cracking of the kind that resulted in the Sherco 3 outage. Never before 2013 had GE recommended the Company undertake

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<sup>22</sup> OAG Comments at 25.

such inspections. Yet GE's 2013 updated guidelines were not admissible in the trial as evidence against GE because, under Minn. R. Evid. 407, they were a "subsequent remedial measure." The reasons underlying GE's change to its guidelines, however, are critical to assessing whether the Company's decisions to maintain the plant were in line with industry standards, thus bearing on prudence.

The prudence reviews undertaken by utilities commissions are some of the most complicated and technically challenging issues that come before them. Because of this, Courts have referred to commissioners as "akin to a jury of experts."<sup>23</sup> It is imperative for the Commission to leverage its expertise and base a finding of prudence on facts and evidence bearing directly on that issue, rather than rely on the findings of a jury of laypersons from a trial that was focused on GE's liability. The appropriate next step in making such a decision is referral to the OAH for the further development of the record.

### **C. If the Commission Finds Imprudence, a Careful Cost Analysis is Required**

If, and only if, after considering a fully developed record, the Commission finds that the Company's management acted imprudently, then it should consider what costs the Company should refund to customers.<sup>24</sup> Having themselves opined on the prudence determination, the Department and the OAG recommend that the Company refund the replacement power costs, less certain offsets. This calculation is premature and likely incorrect because it is not supported by a full record of the various costs and benefits associated with the Company's management of the unit, including those that are not directly tied to the catastrophic event.

For example, if an investigation into prudence reveals that the Company should have procured business interruption insurance, the costs of such insurance since 1977 would have been borne by customers. Because the insurance premiums were never charged to customers but would have been recoverable as a reasonable business expense, they must be deducted from the costs of replacement power incurred by the catastrophe. Additionally, the Department and OAG blame the Company for negotiating a contract with only a four-year warranty. This warranty, however, was notably longer than the typical warranties the Company obtains for generating equipment, which generally are limited to one year. Moreover, had the Company

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<sup>23</sup> *Southern Bell Tel. & Tel. Co. v. Public Service Comm'n*, 244 S.E. 2d 278, 282 (1978).

<sup>24</sup> See, e.g., *Order Accepting 2018-2019 Electric AAA Reports; Notice of and Order for Hearing*, Docket No. E-999/AA-20-171 (Sept. 16, 2020), at 4 (noting question of return of overcharges should be considered following determination of prudence).

even been able to negotiate a contract with a longer warranty period, the price of the turbine likely would have been significantly higher and passed on to customers. These costs should offset the replacement power costs.

The need for a thorough analysis of the costs and benefits to customers, and the extent of economic loss, if any, is evidenced by the Department's changing calculations throughout this proceeding. In 2019, using one method of calculation, the Department argued the Company should refund \$19.8 million to customers. In reaching this calculation, the Department did not even account for the fact that the Commission disallowed \$21.6 million in the Company's 2012 rate case, as we noted in our January 19, 2019 Reply Comments. Now, using an entirely different method, the Department urges a \$17 million refund. In the absence of additional analysis, the Commission cannot be assured any refund, much less that proposed by the Department and OAG, is appropriate results in a supportable outcome.

Without further record development on both the Company's prudent management of Sherco 3, as well as the costs associated with the accident, the Commission will be limited in its ability to determine whether a refund is appropriate, and if so, the correct amount. The Company should not be deprived of the opportunity to present additional witness testimony and documents on these critical questions, and the appropriate way to do so is through a referral of this matter to the OAH.

That said, we recognize that the contested case process is both complex and resource-intensive, and that a standalone contested case on this matter may not be the most efficient course. In light of those considerations, should the Commission deem it appropriate, we would support consolidating this matter with the electric rate case we anticipate filing in November 2021, where the record on this issue could be developed before an administrative law judge.

## **CONCLUSION**

For all of the above reasons and pursuant to Minn. R. 7829.1000, the Company respectfully requests that the Commission either reject the Department's and OAG's recommendations outright or, in the alternative, refer this matter to the Office of Administrative Hearings for hearings regarding the prudence and economic impact of the Company's actions.

Dated: January 27, 2021  
Northern States Power Company

## CERTIFICATE OF SERVICE

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

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

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Dated this 27<sup>th</sup> day of January 2021

/s/

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Mustafa Adam

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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_12-961_Official List
Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates	7400 Lyndale Ave S Ste 190  Richfield, MN 55423	Electronic Service	Yes	OFF_SL_12-961_Official List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.	76 W Kellogg Blvd St. Paul, MN 55102	Electronic Service	No	OFF_SL_12-961_Official List
Byron E.	Starns	byron.starns@stinson.com	STINSON LLP	50 S 6th St Ste 2600 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_12-961_Official List
James M	Strommen	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered	150 S 5th St Ste 700 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_12-961_Official List
Eric	Swanson	eswanson@winthrop.com	Winthrop & Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_12-961_Official List
Lynnette	Sweet	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_12-961_Official List
Lisa	Veith	lisa.veith@ci.stpaul.mn.us	City of St. Paul	400 City Hall and Courthouse 15 West Kellogg Blvd. St. Paul, MN 55102	Electronic Service	No	OFF_SL_12-961_Official List



First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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_13-599_13-599
Brooke	Cooper	bcooper@allete.com	Minnesota Power	30 W Superior St  Duluth, MN 558022191	Electronic Service	No	OFF_SL_13-599_13-599
Marie	Doyle	marie.doyle@centerpointenergy.com	CenterPoint Energy	505 Nicollet Mall P O Box 59038 Minneapolis, MN 554590038	Electronic Service	No	OFF_SL_13-599_13-599
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_13-599_13-599
Bruce	Gerhardson	bgerhardson@otpc.com	Otter Tail Power Company	PO Box 496 215 S Cascade St Fergus Falls, MN 565380496	Electronic Service	No	OFF_SL_13-599_13-599
Douglas	Larson	dlarson@dakotaelectric.com	Dakota Electric Association	4300 220th St W  Farmington, MN 55024	Electronic Service	No	OFF_SL_13-599_13-599
Samantha	Norris	samanthanorris@alliantenergy.com	Interstate Power and Light Company	200 1st Street SE PO Box 351  Cedar Rapids, IA 524060351	Electronic Service	No	OFF_SL_13-599_13-599
Leann	Oehlerking Boes	lboes@mnpower.com	Minnesota Power	30 W Superior St  Duluth, MN 55802	Electronic Service	No	OFF_SL_13-599_13-599
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_13-599_13-599
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_13-599_13-599

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Lynnette	Sweet	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_13-599_13-599
Stuart	Tommerdahl	stommerdahl@otpc.com	Otter Tail Power Company	215 S Cascade St PO Box 496 Fergus Falls, MN 56537	Electronic Service	No	OFF_SL_13-599_13-599
Robyn	Woeste	robynwoeste@alliantenergy.com	Interstate Power and Light Company	200 First St SE Cedar Rapids, IA 52401	Electronic Service	No	OFF_SL_13-599_13-599

[illegible]

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Alan	Jenkins	aj@jenkinsatlaw.com	Jenkins at Law	2950 Yellowtail Ave.  Marathon, FL 33050	Electronic Service	No	OFF_SL_13-868_Official
Richard	Johnson	Rick.Johnson@lawmoss.com	Moss & Barnett	150 S. 5th Street Suite 1200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_13-868_Official
Sarah	Johnson Phillips	sarah.phillips@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_13-868_Official
Mark J.	Kaufman	mkaufman@ibewlocal949.org	IBEW Local Union 949	12908 Nicollet Avenue South  Burnsville, MN 55337	Electronic Service	No	OFF_SL_13-868_Official
Thomas	Koehler	TGK@IBEW160.org	Local Union #160, IBEW	2909 Anthony Ln  St Anthony Village, MN 55418-3238	Electronic Service	No	OFF_SL_13-868_Official
Peder	Larson	plarson@larkinhoffman.com	Larkin Hoffman Daly & Lindgren, Ltd.	8300 Norman Center Drive Suite 1000 Bloomington, MN 55437	Electronic Service	No	OFF_SL_13-868_Official
Douglas	Larson	dlarson@dakotaelectric.com	Dakota Electric Association	4300 220th St W  Farmington, MN 55024	Electronic Service	No	OFF_SL_13-868_Official
Pam	Marshall	pam@energycents.org	Energy CENTS Coalition	823 7th St E  St. Paul, MN 55106	Electronic Service	No	OFF_SL_13-868_Official
Mary	Martinka	mary.a.martinka@xcelenergy.com	Xcel Energy Inc	414 Nicollet Mall 7th Floor Minneapolis, MN 55401	Electronic Service	Yes	OFF_SL_13-868_Official
Brian	Meloy	brian.meloy@stinson.com	STINSON LLP	50 S 6th St Ste 2600  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_13-868_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
David	Moeller	dmoeller@allte.com	Minnesota Power	30 W Superior St  Duluth, MN 558022093	Electronic Service	No	OFF_SL_13-868_Official
Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP	33 South Sixth St Ste 4200  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_13-868_Official
David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency	220 South Sixth Street Suite 1300 Minneapolis, Minnesota 55402	Electronic Service	No	OFF_SL_13-868_Official
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_13-868_Official
Kevin	Reuther	kreuther@mncenter.org	MN Center for Environmental Advocacy	26 E Exchange St, Ste 206  St. Paul, MN 551011667	Electronic Service	No	OFF_SL_13-868_Official
Richard	Savelkoul	rsavelkoul@martinsquires.com	Martin & Squires, P.A.	332 Minnesota Street Ste W2750  St. Paul, MN 55101	Electronic Service	No	OFF_SL_13-868_Official
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th Pl E Ste 350  Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_13-868_Official
Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates	7400 Lyndale Ave S Ste 190  Richfield, MN 55423	Electronic Service	Yes	OFF_SL_13-868_Official
Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.	76 W Kellogg Blvd  St. Paul, MN 55102	Electronic Service	No	OFF_SL_13-868_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Byron E.	Starns	byron.starns@stinson.com	STINSON LLP	50 S 6th St Ste 2600  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_13-868_Official
James M	Strommen	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered	150 S 5th St Ste 700  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_13-868_Official
Eric	Swanson	eswanson@winthrop.com	Winthrop & Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_13-868_Official
Lynnette	Sweet	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7  Minneapolis, MN 554011993	Electronic Service	Yes	OFF_SL_13-868_Official
Lisa	Veith	lisa.veith@ci.stpaul.mn.us	City of St. Paul	400 City Hall and Courthouse 15 West Kellogg Blvd. St. Paul, MN 55102	Electronic Service	No	OFF_SL_13-868_Official
Samantha	Williams	swilliams@nrdc.org	Natural Resources Defense Council	20 N. Wacker Drive Ste 1600 Chicago, IL 60606	Electronic Service	No	OFF_SL_13-868_Official
Patrick	Zomer	Patrick.Zomer@lawmoss.com	Moss & Barnett a Professional Association	150 S. 5th Street, #1200  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_13-868_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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_14-579_OFF_SL_14-579_AA-14-579
Brooke	Cooper	bcooper@allete.com	Minnesota Power	30 W Superior St  Duluth, MN 558022191	Electronic Service	No	OFF_SL_14-579_OFF_SL_14-579_AA-14-579
Marie	Doyle	marie.doyle@centerpointenergy.com	CenterPoint Energy	505 Nicollet Mall P O Box 59038 Minneapolis, MN 554590038	Electronic Service	No	OFF_SL_14-579_OFF_SL_14-579_AA-14-579
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_14-579_OFF_SL_14-579_AA-14-579
Bruce	Gerhardson	bgerhardson@otpc.com	Otter Tail Power Company	PO Box 496 215 S Cascade St Fergus Falls, MN 565380496	Electronic Service	No	OFF_SL_14-579_OFF_SL_14-579_AA-14-579
Douglas	Larson	dlarson@dakotaelectric.com	Dakota Electric Association	4300 220th St W  Farmington, MN 55024	Electronic Service	No	OFF_SL_14-579_OFF_SL_14-579_AA-14-579
Samantha	Norris	samanthanorris@alliantenergy.com	Interstate Power and Light Company	200 1st Street SE PO Box 351  Cedar Rapids, IA 524060351	Electronic Service	No	OFF_SL_14-579_OFF_SL_14-579_AA-14-579
Leann	Oehlerking Boes	lboes@mnpower.com	Minnesota Power	30 W Superior St  Duluth, MN 55802	Electronic Service	No	OFF_SL_14-579_OFF_SL_14-579_AA-14-579
Randy	Olson	rolson@dakotaelectric.com	Dakota Electric Association	4300 220th Street W.  Farmington, MN 55024-9583	Electronic Service	No	OFF_SL_14-579_OFF_SL_14-579_AA-14-579
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_14-579_OFF_SL_14-579_AA-14-579

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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_14-579_OFF_SL_14-579_AA-14-579
Lynnette	Sweet	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7  Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_14-579_OFF_SL_14-579_AA-14-579
Stuart	Tommerdahl	stommerdahl@otpc.com	Otter Tail Power Company	215 S Cascade St PO Box 496 Fergus Falls, MN 56537	Electronic Service	No	OFF_SL_14-579_OFF_SL_14-579_AA-14-579
Robyn	Woeste	robynwoeste@alliantenergy.com	Interstate Power and Light Company	200 First St SE  Cedar Rapids, IA 52401	Electronic Service	No	OFF_SL_14-579_OFF_SL_14-579_AA-14-579



First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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_16-523_AA16-523
Brooke	Cooper	bcooper@allete.com	Minnesota Power	30 W Superior St  Duluth, MN 558022191	Electronic Service	No	OFF_SL_16-523_AA16-523
Marie	Doyle	marie.doyle@centerpointenergy.com	CenterPoint Energy	505 Nicollet Mall P O Box 59038 Minneapolis, MN 554590038	Electronic Service	No	OFF_SL_16-523_AA16-523
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_16-523_AA16-523
Bruce	Gerhardson	bgerhardson@otpc.com	Otter Tail Power Company	PO Box 496 215 S Cascade St Fergus Falls, MN 565380496	Electronic Service	No	OFF_SL_16-523_AA16-523
Douglas	Larson	dlarson@dakotaelectric.com	Dakota Electric Association	4300 220th St W  Farmington, MN 55024	Electronic Service	No	OFF_SL_16-523_AA16-523
Samantha	Norris	samanthanorris@alliantenergy.com	Interstate Power and Light Company	200 1st Street SE PO Box 351  Cedar Rapids, IA 524060351	Electronic Service	No	OFF_SL_16-523_AA16-523
Leann	Oehlerking Boes	lboes@mnpower.com	Minnesota Power	30 W Superior St  Duluth, MN 55802	Electronic Service	No	OFF_SL_16-523_AA16-523
Randy	Olson	rolson@dakotaelectric.com	Dakota Electric Association	4300 220th Street W.  Farmington, MN 55024-9583	Electronic Service	No	OFF_SL_16-523_AA16-523
Catherine	Phillips	Catherine.Phillips@wecenergygroup.com	Minnesota Energy Resources	231 West Michigan St  Milwaukee, WI 53203	Electronic Service	No	OFF_SL_16-523_AA16-523

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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_16-523_AA16-523
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th Pl E Ste 350  Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_16-523_AA16-523
Richard	Stasik	richard.stasik@wecenergygroup.com	Minnesota Energy Resources Corporation (HOLDING)	231 West Michigan St - P321  Milwaukee, WI 53203	Electronic Service	No	OFF_SL_16-523_AA16-523
Lynnette	Sweet	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7  Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_16-523_AA16-523
Stuart	Tommerdahl	stommerdahl@otpc.com	Otter Tail Power Company	215 S Cascade St PO Box 496 Fergus Falls, MN 56537	Electronic Service	No	OFF_SL_16-523_AA16-523
Robyn	Woeste	robynwoeste@alliantenergy.com	Interstate Power and Light Company	200 First St SE  Cedar Rapids, IA 52401	Electronic Service	No	OFF_SL_16-523_AA16-523

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Derek	Bertsch	derek.bertsch@mrenergy.com	Missouri River Energy Services	3724 West Avera Drive PO Box 88920 Sioux Falls, SD 57109-8920	Electronic Service	No	OFF_SL_17-492_OFF_SL_17-492_AA-17-492
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_17-492_OFF_SL_17-492_AA-17-492
Brooke	Cooper	bcooper@allete.com	Minnesota Power	30 W Superior St  Duluth, MN 558022191	Electronic Service	No	OFF_SL_17-492_OFF_SL_17-492_AA-17-492
Marie	Doyle	marie.doyle@centerpointenergy.com	CenterPoint Energy	505 Nicollet Mall P O Box 59038 Minneapolis, MN 554590038	Electronic Service	No	OFF_SL_17-492_OFF_SL_17-492_AA-17-492
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_17-492_OFF_SL_17-492_AA-17-492
Bruce	Gerhardson	bgerhardson@otpc.com	Otter Tail Power Company	PO Box 496 215 S Cascade St Fergus Falls, MN 565380496	Electronic Service	No	OFF_SL_17-492_OFF_SL_17-492_AA-17-492
Douglas	Larson	dlarson@dakotaelectric.com	Dakota Electric Association	4300 220th St W  Farmington, MN 55024	Electronic Service	No	OFF_SL_17-492_OFF_SL_17-492_AA-17-492
Samantha	Norris	samanthanorris@alliantenergy.com	Interstate Power and Light Company	200 1st Street SE PO Box 351  Cedar Rapids, IA 524060351	Electronic Service	No	OFF_SL_17-492_OFF_SL_17-492_AA-17-492
Leann	Oehlerking Boes	lboes@mnpower.com	Minnesota Power	30 W Superior St  Duluth, MN 55802	Electronic Service	No	OFF_SL_17-492_OFF_SL_17-492_AA-17-492
Randy	Olson	rolson@dakotaelectric.com	Dakota Electric Association	4300 220th Street W.  Farmington, MN 55024-9583	Electronic Service	No	OFF_SL_17-492_OFF_SL_17-492_AA-17-492

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Catherine	Phillips	Catherine.Phillips@wecenergygroup.com	Minnesota Energy Resources	231 West Michigan St Milwaukee, WI 53203	Electronic Service	No	OFF_SL_17-492_OFF_SL_17-492_AA-17-492
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_17-492_OFF_SL_17-492_AA-17-492
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_17-492_OFF_SL_17-492_AA-17-492
Richard	Stasik	richard.stasik@wecenergygroup.com	Minnesota Energy Resources Corporation (HOLDING)	231 West Michigan St - P321  Milwaukee, WI 53203	Electronic Service	No	OFF_SL_17-492_OFF_SL_17-492_AA-17-492
Kristin	Stastny	kstastny@taftlaw.com	Taft Stettinius & Hollister LLP	2200 IDS Center 80 South 8th St Minneapolis, MN 55402	Electronic Service	No	OFF_SL_17-492_OFF_SL_17-492_AA-17-492
Lynnette	Sweet	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7  Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_17-492_OFF_SL_17-492_AA-17-492
Stuart	Tommerdahl	stommerdahl@otpc.com	Otter Tail Power Company	215 S Cascade St PO Box 496 Fergus Falls, MN 56537	Electronic Service	No	OFF_SL_17-492_OFF_SL_17-492_AA-17-492
Robyn	Woeste	robynwoeste@alliantenergy.com	Interstate Power and Light Company	200 First St SE  Cedar Rapids, IA 52401	Electronic Service	No	OFF_SL_17-492_OFF_SL_17-492_AA-17-492

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Derek	Bertsch	derek.bertsch@mrenergy.com	Missouri River Energy Services	3724 West Avera Drive PO Box 88920 Sioux Falls, SD 57109-8920	Electronic Service	No	OFF_SL_18-373_AA -18-373
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_18-373_AA -18-373
Brooke	Cooper	bcooper@allete.com	Minnesota Power	30 W Superior St  Duluth, MN 558022191	Electronic Service	No	OFF_SL_18-373_AA -18-373
Marie	Doyle	marie.doyle@centerpointenergy.com	CenterPoint Energy	505 Nicollet Mall P O Box 59038 Minneapolis, MN 554590038	Electronic Service	No	OFF_SL_18-373_AA -18-373
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_18-373_AA -18-373
Bruce	Gerhardson	bgerhardson@otpc.com	Otter Tail Power Company	PO Box 496 215 S Cascade St Fergus Falls, MN 565380496	Electronic Service	No	OFF_SL_18-373_AA -18-373
Douglas	Larson	dlarson@dakotaelectric.com	Dakota Electric Association	4300 220th St W  Farmington, MN 55024	Electronic Service	No	OFF_SL_18-373_AA -18-373
Samantha	Norris	samanthanorris@alliantenergy.com	Interstate Power and Light Company	200 1st Street SE PO Box 351  Cedar Rapids, IA 524060351	Electronic Service	No	OFF_SL_18-373_AA -18-373
Leann	Oehlerking Boes	lboes@mnpower.com	Minnesota Power	30 W Superior St  Duluth, MN 55802	Electronic Service	No	OFF_SL_18-373_AA -18-373
Randy	Olson	rolson@dakotaelectric.com	Dakota Electric Association	4300 220th Street W.  Farmington, MN 55024-9583	Electronic Service	No	OFF_SL_18-373_AA -18-373

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Catherine	Phillips	Catherine.Phillips@wecenergygroup.com	Minnesota Energy Resources	231 West Michigan St Milwaukee, WI 53203	Electronic Service	No	OFF_SL_18-373_AA -18-373
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_18-373_AA -18-373
Isabel	Ricker	ricker@fresh-energy.org	Fresh Energy	408 Saint Peter Street Suite 220 Saint Paul, MN 55102	Electronic Service	No	OFF_SL_18-373_AA -18-373
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_18-373_AA -18-373
Richard	Stasik	richard.stasik@wecenergygroup.com	Minnesota Energy Resources Corporation (HOLDING)	231 West Michigan St - P321  Milwaukee, WI 53203	Electronic Service	No	OFF_SL_18-373_AA -18-373
Kristin	Stastny	kstastny@taftlaw.com	Taft Stettinius & Hollister LLP	2200 IDS Center 80 South 8th St Minneapolis, MN 55402	Electronic Service	No	OFF_SL_18-373_AA -18-373
Lynnette	Sweet	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7  Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_18-373_AA -18-373
Stuart	Tommerdahl	stommerdahl@otpc.com	Otter Tail Power Company	215 S Cascade St PO Box 496 Fergus Falls, MN 56537	Electronic Service	No	OFF_SL_18-373_AA -18-373
Robyn	Woeste	robynwoeste@alliantenergy.com	Interstate Power and Light Company	200 First St SE  Cedar Rapids, IA 52401	Electronic Service	No	OFF_SL_18-373_AA -18-373