The Office of
Minnesota Attorney General Keith Ellison
helping people afford their lives and live with dignity and respect • www.ag.state.mn.us

March 16, 2022

Mr. Will Seuffert
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101

Re: ***In the Matter of the Petition of Northern States Power Company d/b/a Xcel Energy for Approval of 2021 True-Up Mechanisms***
MPUC Docket No. E-002/M-20-743

Dear Mr. Seuffert:

The Office of the Attorney General—Residential Utilities Division ("OAG") respectfully submits this reply comment letter recommending that the Minnesota Public Utilities Commission ("Commission") reject Xcel Large Industrials' ("XLIs") latest attempt to commandeer residential ratepayer benefits for their own gain. XLIs seek to eliminate the Northern States Power Company d/b/a Xcel Energy ("Xcel" or the "Company") 2021 Sales True-Up by recycling arguments previously rejected by the Commission that warrant rejection again here. They also propose modifications to the 2021 Sales True-Up that constitute retroactive ratemaking, and are unjust and unreasonable because they eradicate the true-up refund earned by residential ratepayers based on increased 2021 energy usage. Even if the Commission finds XLIs' equity arguments persuasive, comparing the 2021 Sales True-Up to Xcel's pending rate case is inappropriate. The OAG is not categorically opposed to eliminating or mitigating XLIs' 2021 Sales True-Up surcharge; however, the Commission should reject any proposed remedy that seeks to relitigate the 2021 Stay Out or divests the Residential class of its rightful 2021 Sales True-Up refund.

ANALYSIS

I. XLIs Attempt to Undercut the Results of the 2021 Sales True-Up Using Recycled Arguments that Have Already Been Rejected by the Commission.

XLIs rehash old arguments to try to persuade the Commission that it should modify or abolish the 2021 Sales True-Up. In particular, they argue that the Commission lacked the legal authority to approve the true-up, that the Demand class surcharge is being used to "fund" the Residential class refund, and that the Commission should approve modifications that would eliminate the Residential class rate decrease that results from the true-up refund. All of these arguments lack merit and have been previously rejected by the Commission.

A. XLIs' Argument that the Commission Lacks the Legal Authority to Approve the 2021 Sales True-Up Disregards Prior Commission Decisions.

In their 2021 Sales True-Up comments, XLIs resurrect the same defective argument they used to challenge the Commission's authority to adopt Xcel's 2019 and 2020 Stay Out proposals, as well as the 2020 Sales True-Up. Namely, they argue that the true-up violates the multiyear rate plan ("MYRP") statute by exceeding the five-year MYRP rate limit.[1]

The Commission previously rejected XLIs' MYRP rate limit argument and should do so again here. In its *2021 Stay Out Order*, the Commission explained that the MYRP statute did not constrain its authority to approve the 2021 Stay Out and the associated 2021 Sales True-Up, finding that

> the Commission is not persuaded that approval of the Stay Out Proposal violates the multiyear rate plan statute, as some parties have claimed. In approving Xcel's 2020 true-ups, the Commission explained that while the statute does not specify what happens to a utility's rates after the conclusion of a multiyear rate plan, Xcel's 2015 multiyear rate plan authorizes rates in effect during the final year of the plan to remain in effect, unless the Company files another multiyear rate plan 60 days prior to the conclusion of the term and proposes new interim rates. This result, the Commission found, was consistent with applicable law and Commission orders determining how utilities subject to a multiyear rate plan should proceed at the conclusion of such a plan.[2]

XLIs' most recent attempt to resuscitate the already-settled MYRP rate limit issue remains unconvincing. As it has in the past, the Commission should reject XLIs' unfounded challenge to its true-up authority.

B. XLIs' Claim that Their Surcharge "Funds" the Refund to the Residential Class Mischaracterizes 2021 Sales True-Up.

There is no merit to the argument that the 2021 Sales True-Up results in the Demand class subsidizing the Residential class. The impact of the true-up on each class is directly related to the sales growth or decline of that class. Demand class sales decreased in 2021, while Residential class sales increased; hence, the Demand class surcharge.

According to the Department, the Demand class has had the largest MWh decline over the 2015 MYRP and reductions in sales to the Demand class accounted for 95.2 percent and 94.3

---

[1] *In the Matter of the Petition of Northern States Power Company, d/b/a Xcel Energy, for Approval of True-Up Mechanisms*, Docket No. E-002/M-20-743, XLI Comments at 11-12 (Mar. 1, 2022) ("XLI Comments").

[2] Docket No. E-002/M-20-743, ORDER APPROVING TRUE-UPS WITH MODIFICATIONS AND REQUIRING XCEL TO WITHDRAW ITS NOTICE OF CHANGE IN RATES AND INTERIM RATE PETITION at 12 (Apr. 2, 2021) ("*2021 Stay Out Order*").

percent of Xcel's overall sales declines in 2020 and 2021, respectively.[3] Specifically, sales to the Demand class decreased by 2,069,481 MWh in 2021[4] because of, among other things, customers adding combined heat and power ("CHP") generation, customers either moving out of the service territory or reducing/shutting down operations, distributed solar generation, and weakened economic conditions due to the COVID-19 pandemic.[5]

Meanwhile, the Residential class experienced an increase in both actual and weather-normalized sales in 2021.[6] Specifically, the Residential class experienced a 652,664 MWh increase in 2021 sales[7] from warmer-than-normal weather, customer growth, and "a general increase in usage as [residential] customers spent more time at home, and in some cases worked from home, as a result of the COVID-19 pandemic shutdowns and social distancing protocols."

XLIs' claim that their surcharge "funds" the refund to the Residential class mischaracterizes 2021 Sales True-Up. The true-up was always intended to refund or surcharge each class for its change in sales. Demand class sales have fallen, while Residential class sales have risen. The drop in Demand class sales and the corresponding surcharge should not dissuade the Commission from approving the 2021 Sales True-Up.

C. XLIs' Proposed Modifications to the 2021 Sales True-Up Constitute Retroactive Ratemaking, and Unjustly and Unreasonably Deprive Residential Ratepayers of their 2021 Sales True-Up Refund.

XLIs' proposed modifications to the 2021 True-Up would constitute retroactive ratemaking, and would unjustly and unreasonably strip the Residential class of its 2021 Sales True-Up refund, resulting in increased residential rates. Moreover, the proposed modifications are not in the public interest and seek to relitigate the 2021 Stay Out. Just and reasonable rate considerations formed the core of the Commission's 2021 Stay Out decision, and arguments that the just and reasonable rate standard was "ignored" are unfounded.

XLIs assert that their proposals to modify Xcel's 2021 Sales True-Up are not retroactive ratemaking. XLIs are wrong. A key aspect of ratemaking is that operates *prospectively*.[8] XLIs' proposed modifications, however, seek to *retroactively* eliminate the 2021 Sales True-Up or make after-the-fact adjustments to the true-up methodology. This *ex post facto* elimination of a core component of the 2021 Stay Out would increase residential rates by stripping the Residential class of

---

[3] Docket No. E-002/M-20-743, Comments of the Minnesota Department of Commerce, Division of Energy Resources at 5 (Mar. 1, 2022).
[4] As compared to 2016 Test Year weather-normalized sales. Docket No. E-002/M-20-743, Xcel Energy Compliance Filing – 2021 Sales and Related Revenue Calculations at 3 (Feb. 1, 2022) ("Xcel Energy Compliance Filing").
[5] *Id.* at 3-6.
[6] As compared to 2016 Test Year weather-normalized sales. *Id.* at 3.
[7] As compared to 2016 Test Year weather-normalized sales. *Id.*
[8] *See* Minn. Stat. § 216B.16, subd. 5 (explaining that after the Commission fixes rates by order, the rates shall "*thereafter*" be observed and rate design changes shall be "*prospective*") (emphasis added); Minn. Stat. § 216B.23, subd. 1 ("[T]he commission shall . . . by order fix reasonable rates . . . to be imposed, observed, and followed *in the future* . . . .") (emphasis added); *see also Peoples Natural Gas Co. v. Minnesota Pub. Utils. Comm'n*, 369 N.W.2d 530, 533 (Minn. 1985) (noting ratemaking is quasi-legislative function and legislation operates *prospectively*).

its true-up refund and is the epitome of retroactive ratemaking.[9] XLIs' proposed modifications are unjust, unreasonable, prohibited by statute,[10] and must be denied.

As XLIs concede, the *TCRR Order* they rely on in their comments does not actually address retroactive ratemaking,[11] relying instead on public interest considerations and perceived ratepayer benefits to grant a Minnesota Power rider recovery request.[12] Even under public interest and ratepayer benefit tests, however, XLIs' proposed sales true-up modifications fail. The Commission's purposeful weighing of public interest considerations and perceived ratepayer benefits in the *2021 Stay Out Order* led to the approval of the very sales true-up that XLIs now seek to eliminate:

> After careful consideration of the issues raised in this case, the Commission is persuaded that, on balance, granting [Xcel's] petition with [the Commission's approved] modifications offers the broadest protection to ratepayers as a whole and will ensure just and reasonable rates. Avoiding an immediate interim rate increase for any customer class reduces the risk of additional economic hardship and service disconnections to individuals, families, and businesses already experiencing financial strain as a result of the pandemic. This level of certainty is the most reasonable and equitable course of action under these uniquely compelling and unforeseen circumstances. . . . [T]he Commission is persuaded that Xcel's Stay Out Proposal is reasonable, equitable, and consistent with the public interest and will therefore approve the proposal, as modified and as set forth in the ordering paragraphs below, on the condition that the Company comply with the commitments described herein and withdraw its general rate case filing.[13]

XLIs' request to retroactively cap the 2021 Sales True-Up is an unreasonable attempt to relitigate the 2021 Stay Out and would result in increased residential rates. Proposing to cap the 2021 Sales True-Up at Xcel's stated revenue deficiency discards the Commission's carefully considered, previously approved sales true-up methodology and supplants it with a methodology solely designed to further the interests of the Demand class. Furthermore, although capping the 2021 Sales True-Up at Xcel's stated revenue deficiency would reduce the Demand class surcharge, *it would also eliminate the Residential class true-up refund*, resulting in a *de facto* residential rate increase.[14] XLIs made a similar request to impose a cap in the 2020 Sales True-Up and were

---

[9] XLI Comments at 13 (acknowledging that rejecting the implementation of the 2021 Sales True-Up "will erase potential refunds owed to other classes and deny Xcel recovery of the 2021 True-Up").
[10] *See* Minn. Stat. § 216B.23, subd. 1 (prohibiting retroactive ratemaking in the context of the Commission's rate refund authority); *Peoples Natural Gas Co.*, 369 N.W.2d at 533 ("[T]he Public Utility Act expressly prohibits retroactive ratemaking.").
[11] XLI Comments at 8 ("The MP Order does not directly address parties' retroactive ratemaking concerns.")
[12] *In the Matter of Minnesota Power's Request for Approval of its 2019 Transmission Factors Under its Transmission Cost Recovery Rider*, Docket No. E-015/M-19-440, ORDER APPROVING TRANSMISSION COST RECOVERY, CLARIFYING PRIOR ORDER, AND REQUIRING FILINGS at 4 (Dec. 3, 2020) ("*TCRR Order*").
[13] *2021 Stay Out Order* at 13-14.
[14] XLI Comments at 14 (admitting that the proposed cap "will eliminate refunds for certain customer classes").

denied.[15] Addressing the possibility that sales could decrease beyond Xcel's forecast, the Commission reasoned that the benefits of the 2020 Stay Out offset the potential risks of a Demand class true-up surcharge:

> The Commission acknowledges that some of these factors also have shortcomings and risks; for example, the ratepayer benefits of deferring Xcel's rate proceeding to no sooner than 2021 may not be universal. However, *it is impossible to predict with certainty the outcome of a full rate proceeding or the 2020 sales true-ups*; arguments that certain classes of ratepayers would be better off with a full rate proceeding are speculative and, even if realized, benefits to some ratepayers are likely to be overwhelmed by detriments to others. . . . Overall the ratepayer and public interest benefits of granting this True-Up Petition are more certain and broadly realized, and the risks less significant, than to deny this petition and to proceed with the rate case.[16]

XLIs' proposed true-up modifications are nothing more than repackaged attempts to relitigate the Commission's *2021 Stay Out Order*. XLIs seek to retroactively modify the 2021 Sales True-Up and offset declining Demand class sales by commandeering the residential refund. XLIs seek to compromise the Residential class's 2021 Sales True-Up refund either by eliminating it entirely or using it to unreasonably subsidize the decrease in Demand class sales. Because both proposed modifications *unjustly increase rates for residential customers*, the Commission should reject them outright.

D. The 2021 Sales True-Up Is Consistent with Minnesota Energy Law.

XLIs argue that demand-billed customer rates and bills do not comply with Minnesota energy policy under Minn. Stat. § 216C.05, subd. 2(4).[17] This is the same argument XLIs made when they originally objected to the 2021 Stay Out.[18] As Xcel aptly points out, "[t]he Commission carefully considered this argument and the impact of both the [2021] Stay Out Proposal and interim rates on all parties"[19] and concluded that adoption of the stay-out was the most reasonable and equitable course of action:

> [The Commission's 2021 Stay Out] finding . . . is consistent with the Commission's obligation to ensure that every rate is "just and

[15] *In the Matter of the Petition of Northern States Power Company, dba Xcel Energy, for Approval of True-Up Mechanisms*, Docket No. E-002/M-19-688, XLI Comments at 4-6, 8-9 (Mar. 1, 2021) (asking the Commission to cap demand-billed customers' surcharge at the amount originally projected in the 2020 Stay Out petition and 2020 Stay Out order).
[16] Docket No. E-002/M-19-688, ORDER APPROVING TRUE-UPS AND REQUIRING XCEL TO WITHDRAW ITS NOTICE OF CHANGE IN RATES AND INTERIM RATE PETITION at 9 (Mar. 13, 2020) (emphasis added).
[17] XLI Comments at 8-11.
[18] *See* Docket No. E-002/M-20-743 et al., XLI Reply Comments at 2-3 (Nov. 17, 2020); Docket No. E-002/M-20-743 et al., XLI Petition for Reconsideration and Initial Comment at 12-14 (Apr. 22, 2021).
[19] Docket No. E-002/M-20-743 et al., Xcel Energy Reply Comments and Answer to Petition for Reconsideration at 5 (May 3, 2021).

> reasonable." XLI's invocation of Section 216C.05 does not change this conclusion. That statute lays out the state's "vital interest" in providing for "increased efficiency in energy consumption, the development and use of renewable energy resources wherever possible, and the creation of an effective energy forecasting, planning, and education program." To that end, the statute includes a handful of specific "energy policy goals" related to annual energy savings, fossil fuel reductions, and renewable resource development. As noted by XLI, in addition to these specific goals, the statute includes an affordability goal that was added in 2017. But this is not a requirement for the Commission to apply when setting rates. Instead, it is a goal to be considered alongside other goals when the state is engaged in energy planning and does not justify the Commission's reconsideration of its Order in this docket.
>
> In fact, on March 9, 2021, the Commission held a special planning meeting to assist it in monitoring retail electric prices consistent with Section 216C.05, subd. 2. In that meeting, the Commission reviewed the average monthly bills of [Xcel], Minnesota Power, and Ottertail Power, comparing them on a residential, commercial, and industrial class basis to the rates of other utilities in Minnesota and across the nation. Among other things, this review showed that . . . [Xcel]'s rates across all classes have been very stable for the last 15 years, with residential rates growing at 0.5%, commercial rates growing at 0.3%, and industrial rates growing at 0.2% in real dollars from 2005 through 2019. This analysis further demonstrates that Large C&I customers in Minnesota have not unfairly shouldered a disproportionate amount of costs or rate increases. In fact, as the Commission's review showed, industrial customers have experienced the lowest amount of rate growth compared to any other customer class from 2005 through 2019.[20]

That neither the Commission's *2021 Stay Out Order*, nor its *2021 Stay Out Reconsideration Order* discuss XLIs' energy policy goals argument is telling. Using a state energy affordability *goal* to undercut the broader ratepayer benefits of the 2021 Stay Out—which includes the 2021 Sales True-Up—is unreasonable and inappropriate.

II. THE 2021 SALES TRUE-UP COMPLIES WITH THE *2021 STAY OUT ORDER* AND COMPARISON TO XCEL'S PENDING RATE CASE IS IMPROPER

The 2021 Sales True-Up complies with the *2021 Stay Out Order* and comparison to Xcel's pending rate case is improper. The impacts of the true-up on the Demand class are lower than originally forecasted by the 2021 Stay Out. Also, XLIs benefit from deliberately constructed rate mitigation measures that were incorporated into the *2021 Stay Out Order* to soften the negative

[20] *Id.* at 5-6.

impacts of a Demand class sales decrease. Finally, while the *2021 Stay Out Order* was based on a full rate case record, the outcome of Xcel's pending rate case remains uncertain.

The 2021 Sales True-Up results are based on comparing 2021 actual sales and 2016 weather-normalized actual sales by class, in accordance with the Commission's *2021 Stay Out Order*.[21] XLIs admit that the overall amount of the 2021 Stay Out is less than initially projected, with demand-billed customers receiving a true-up value of approximately $118.4 million, or $53 million less than the originally anticipated true-up value.[22] Nonetheless, XLIs use a series of equity arguments to try to persuade the Commission to retroactively eliminate or modify the 2021 Sales True-Up. These arguments ignore Commission consideration of Demand-class equity concerns in the *2021 Stay Out Order*:

> While there are important advantages to approving the Stay Out Proposal, the Commission also recognizes the potential risks that the proposal carries for some customers. The Commission will therefore direct Xcel to modify its initial proposal to address those concerns . . . . In response to claims that the Demand class would fare better under a rate case proceeding, the Commission cautions that those assertions do not fully account for the fact that the outcome of either an interim rates decision or a final rates decision is speculative. Any potential reduction to either interim or final rates is unknown. And, while the Company's interim rates proposal could be reduced if the Commission found exigent circumstances, it is unclear to what extent and in what manner interim rates would be reduced in such a scenario.[23]

XLIs also admit that the 2021 Stay Out included built-in rate mitigation measures specific to the Demand class to soften the negative impact of the class's own sales decrease.[24] Among them were the immediate suspension of interim rates,[25] an extension of the recovery period for the Demand class surcharge from 12 to 21 months,[26] and a cap on Xcel's 2021 Minnesota jurisdictional earnings at a 9.06 return on equity with a requirement that any excess earnings be returned via the 2021 Sales True-Up.[27] Arguments that these measures provided insufficient protection to the Demand class were explicitly addressed by the Commission, who still determined that the 2021 Stay Out offered greater protections to ratepayers than a general rate case:

> Although some parties claimed that these commitments provide insufficient protection to the Demand class in particular, the Commission is not persuaded that proceeding with a general rate

[21] *See 2021 Stay Out Order* at 5-6, 15; Xcel Energy Compliance Filing at 1.
[22] *Compare* XLI Comments at 3 (projected $171.4 million) *with* XLI Comments at 5 (actual true-up value of approximately $118.4 million) ($171.4 - $118.4 = 53 million).
[23] *2021 Stay Out Order* at 13.
[24] XLI Comments at 3.
[25] *2021 Stay Out Order* at 4.
[26] *Id.* at 15.
[27] *Id.*

> case is more likely to provide greater benefits to the Demand class or to ratepayers as a whole. And while the Department's cost-sharing approach is inviting, it does not appear to be a viable alternative that the Company could accept, thereby leading the Company to proceed with a general rate case that does not, on balance, offer greater protections to ratepayers than the benefits of the Stay Out Proposal.[28]

XLIs invite the Commission to filter the results of the 2021 Sales True-Up through the lens of Xcel's recently filed rate case.[29] Comparing the true-up to Xcel's pending rate case is inappropriate for a few reasons. To start, the 2021 Stay Out appropriately used assumptions from the 2015 MYRP to formulate the sales true-up. In contrast, the assumptions and forecasts that drive the 2022 test year in Xcel's recently filed rate case are untested and will remain so until the rate case proceeding is completed. In addition, the 2015 MYRP offered an extensive rate case record that had been scrutinized by the Commission and the parties. In contrast, the current Xcel rate case proceeding is in a nascent stage, with direct testimony not due until October 3, 2022.[30] Finally, the Commission previously found the base rates established in Xcel's 2015 MYRP to be just and reasonable, even after the conclusion of the MYRP.[31] In contrast, it will be over a year before the Commission issues its order setting just and reasonable rates in Xcel's pending rate case.[32] For all of these reasons, the Commission should decline XLIs' invitation to compare the results of the 2021 Sales True-Up to Xcel's pending rate case.

If the Commission finds the Demand class equity arguments persuasive, it may wish to eliminate or delay all or a portion of the true-up surcharge to that class. The OAG is not opposed to the mitigation of the Demand class true-up surcharge, as long as such mitigation does not eliminate or decrease the Residential class true-up refund, or otherwise retroactively increase residential rates.

CONCLUSION

A decrease in Demand class sales should not dissuade the Commission from approving the 2021 Sales True-Up. The 2021 Sales True-Up has functioned as approved in the Commission's *2021 Stay Out Order*. The true-up was designed to refund or surcharge each of Xcel's customer classes for their changes in sales. While the impacts of a true-up can never be known in advance, this was the trade-off that the parties and the Commission accepted to avoid a rate case. Whereas Demand class sales have systematically declined in the past year, Residential class sales have remained relatively consistent throughout the COVID-19 pandemic, bringing Xcel revenue stability. The OAG is agnostic about how the Commission addresses the reduction in Demand class sales, and the corresponding 2021 Sales True-Up surcharge, as long as the burden of the

---

[28] *Id.* at 14.
[29] XLI Comments at 3-4, 6-7, 12, 14.
[30] *In The Matter of the Application of Northern States Power Company, d/b/a Xcel Energy, for Authority to Increase Rates for Electric Service in the State of Minnesota*, Docket No. E-002/GR-21-630, FIRST PREHEARING ORDER at 3 (Jan. 19, 2022) ("*First Prehearing Order*").
[31] *2021 Stay Out Order* at 12; Minn. Stat. § 216B.16, subd. 19.
[32] *First Prehearing Order* at 3 (setting a June 30, 2023 date for a Commission order).

revenue loss is not shifted to the Residential class by eliminating or decreasing the class's true-up refund, which would result in a *de facto* increase to residential rates.

Sincerely,

/s/ **Kristin Berkland**

KRISTIN BERKLAND
Assistant Attorney General

(651) 757-1236 (Voice)
(651) 296-9663 (Fax)
kristin.berkland@ag.state.mn.us

CERTIFICATE OF SERVICE

Re: ***In the Matter of the Petition of Northern States Power Company d/b/a Xcel Energy for Approval of 2021 True-Up Mechanisms***
MPUC Docket No. E-002/M-20-743

I, JUDY SIGAL, hereby certify that on the 16th day of March, 2022, I e-filed in eDockets ***a Reply Comment Letter of the Office of The Attorney General—Residential Utilities Division*** and served a true and correct copy of the same upon all parties listed on the attached service list by e-mail, electronic submission, and/or United States Mail with postage prepaid, and deposited the same in a U.S. Post Office mail receptacle in the City of St. Paul, Minnesota.

/s/ Judy Sigal
JUDY SIGAL

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Michael	Ahern	ahern.michael@dorsey.com	Dorsey & Whitney, LLP	50 S 6th St Ste 1500 Minneapolis, MN 554021498	Electronic Service	No	OFF_SL_20-743_Official
Kristine	Anderson	kanderson@greatermngas.com	Greater Minnesota Gas, Inc.& Greater MN Transmission, LLC	1900 Cardinal Lane PO Box 798 Faribault, MN 55021	Electronic Service	No	OFF_SL_20-743_Official
Alison C	Archer	aarcher@misoenergy.org	MISO	2985 Ames Crossing Rd Eagan, MN 55121	Electronic Service	No	OFF_SL_20-743_Official
James J.	Bertrand	james.bertrand@stinson.com	STINSON LLP	50 S 6th St Ste 2600 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-743_Official
Brenda A.	Bjorklund	brenda.bjorklund@centerpointenergy.com	CenterPoint Energy	505 Nicollet Mall Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-743_Official
James	Canaday	james.canaday@ag.state.mn.us	Office of the Attorney General-RUD	Suite 1400 445 Minnesota St. St. Paul, MN 55101	Electronic Service	No	OFF_SL_20-743_Official
Cody	Chilson	cchilson@greatermngas.com	Greater Minnesota Gas, Inc. & Greater MN Transmission, LLC	1900 Cardinal Ln PO Box 798 Faribault, MN 55021	Electronic Service	No	OFF_SL_20-743_Official
Ray	Choquette	rchoquette@agp.com	Ag Processing Inc.	12700 West Dodge Road PO Box 2047 Omaha, NE 68103-2047	Electronic Service	No	OFF_SL_20-743_Official
John	Coffman	john@johncoffman.net	AARP	871 Tuxedo Blvd. St, Louis, MO 63119-2044	Electronic Service	No	OFF_SL_20-743_Official
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_20-743_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Riley	Conlin	riley.conlin@stoel.com	Stoel Rives LLP	33 S. 6th Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-743_Official
Brooke	Cooper	bcooper@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022191	Electronic Service	No	OFF_SL_20-743_Official
Hillary	Creurer	hcreurer@allete.com	Minnesota Power	30 W Superior St Duluth, MN 55802	Electronic Service	No	OFF_SL_20-743_Official
George	Crocker	gwillc@nawo.org	North American Water Office	PO Box 174 Lake Elmo, MN 55042	Electronic Service	No	OFF_SL_20-743_Official
Bridget	Dockter	Bridget.Dockter@xcelenergy.com		N/A	Electronic Service	No	OFF_SL_20-743_Official
Marie	Doyle	marie.doyle@centerpointenergy.com	CenterPoint Energy	505 Nicollet Mall P O Box 59038 Minneapolis, MN 554590038	Electronic Service	No	OFF_SL_20-743_Official
Michelle	Dreier	mdreier@electricalassociation.com		N/A	Electronic Service	No	OFF_SL_20-743_Official
Ron	Elwood	relwood@mnlsap.org	Legal Services Advocacy Project	970 Raymond Avenue Suite G-40 Saint Paul, MN 55114	Electronic Service	No	OFF_SL_20-743_Official
James C.	Erickson	jericksonkbc@gmail.com	Kelly Bay Consulting	17 Quechee St Superior, WI 54880-4421	Electronic Service	No	OFF_SL_20-743_Official
John	Farrell	jfarrell@ilsr.org	Institute for Local Self-Reliance	2720 E. 22nd St Institute for Local Self-Reliance Minneapolis, MN 55406	Electronic Service	No	OFF_SL_20-743_Official
Eric	Fehlhaber	efehlhaber@dakotaelectric.com	Dakota Electric Association	4300 220th St W Farmington, MN 55024	Electronic Service	No	OFF_SL_20-743_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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_20-743_Official
Lucas	Franco	lfranco@liunagroc.com	LIUNA	81 Little Canada Rd E Little Canada, MN 55117	Electronic Service	No	OFF_SL_20-743_Official
Daryll	Fuentes	energy@usg.com	USG Corporation	550 W Adams St Chicago, IL 60661	Electronic Service	No	OFF_SL_20-743_Official
James	Garness	james.r.garness@xcelenergy.com		N/A	Electronic Service	No	OFF_SL_20-743_Official
Edward	Garvey	edward.garvey@AESLconsulting.com	AESL Consulting	32 Lawton St Saint Paul, MN 55102-2617	Electronic Service	No	OFF_SL_20-743_Official
Bruce	Gerhardson	bgerhardson@otpco.com	Otter Tail Power Company	PO Box 496 215 S Cascade St Fergus Falls, MN 565380496	Electronic Service	No	OFF_SL_20-743_Official
Anita	Grace	anita@gracemulticultural.com	GRACE Multicltural	12959 196th LN NW Elk River, MN 55330	Electronic Service	No	OFF_SL_20-743_Official
Bill	Grant	billgrant@minncap.org	Minnesota Community Action Partnership	MCIT Building 100 Empire Dr Ste 202 St. Paul, MN 55103	Electronic Service	No	OFF_SL_20-743_Official
Todd J.	Guerrero	todd.guerrero@kutakrock.com	Kutak Rock LLP	Suite 1750 220 South Sixth Street Minneapolis, MN 554021425	Electronic Service	No	OFF_SL_20-743_Official
Adam	Heinen	aheinen@dakotaelectric.com	Dakota Electric Association	4300 220th St W Farmington, MN 55024	Electronic Service	No	OFF_SL_20-743_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Annete	Henkel	mui@mnutilityinvestors.org	Minnesota Utility Investors	413 Wacouta Street #230 St.Paul, MN 55101	Electronic Service	No	OFF_SL_20-743_Official
Corey	Hintz	chintz@dakotaelectric.com	Dakota Electric Association	4300 220th Street Farmington, MN 550249583	Electronic Service	No	OFF_SL_20-743_Official
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_20-743_Official
MJ	Horner	mj.horner@xcelenergy.com		N/A	Electronic Service	No	OFF_SL_20-743_Official
Lori	Hoyum	lhoyum@mnpower.com	Minnesota Power	30 West Superior Street Duluth, MN 55802	Electronic Service	No	OFF_SL_20-743_Official
Travis	Jacobson	travis.jacobson@mdu.com	Great Plains Natural Gas Company	400 N 4th St Bismarck, ND 58501	Electronic Service	No	OFF_SL_20-743_Official
Alan	Jenkins	aj@jenkinsatlaw.com	Jenkins at Law	2950 Yellowtail Ave. Marathon, FL 33050	Electronic Service	No	OFF_SL_20-743_Official
Richard	Johnson	Rick.Johnson@lawmoss.com	Moss & Barnett	150 S. 5th Street Suite 1200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-743_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_20-743_Official
Nick	Kaneski	nick.kaneski@enbridge.com	Enbridge Energy Company, Inc.	11 East Superior St Ste 125 Duluth, MN 55802	Electronic Service	No	OFF_SL_20-743_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Thomas	Koehler	TGK@IBEW160.org	Local Union #160, IBEW	2909 Anthony Ln St Anthony Village, MN 55418-3238	Electronic Service	No	OFF_SL_20-743_Official
Michael	Krikava	mkrikava@taftlaw.com	Taft Stettinius & Hollister LLP	2200 IDS Center 80 S 8th St Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-743_Official
Nicolle	Kupser	nkupser@greatermngas.com	Greater Minnesota Gas, Inc. & Greater MN Transmission, LLC	1900 Cardinal Ln PO Box 798 Faribault, MN 55021	Electronic Service	No	OFF_SL_20-743_Official
James D.	Larson	james.larson@avantenergy.com	Avant Energy Services	220 S 6th St Ste 1300 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-743_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_20-743_Official
Amber	Lee	Amber.Lee@centerpointenergy.com	CenterPoint Energy	505 Nicollet Mall Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-743_Official
Annie	Levenson Falk	annielf@cubminnesota.org	Citizens Utility Board of Minnesota	332 Minnesota Street, Suite W1360 St. Paul, MN 55101	Electronic Service	No	OFF_SL_20-743_Official
Ryan	Long	ryan.j.long@xcelenergy.com	Xcel Energy	414 Nicollet Mall 401 8th Floor Minneapolis, MN 55401	Electronic Service	No	OFF_SL_20-743_Official
Susan	Ludwig	sludwig@mnpower.com	Minnesota Power	30 West Superior Street Duluth, MN 55802	Electronic Service	No	OFF_SL_20-743_Official
Kavita	Maini	kmaini@wi.rr.com	KM Energy Consulting, LLC	961 N Lost Woods Rd Oconomowoc, WI 53066	Electronic Service	No	OFF_SL_20-743_Official

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_20-743_Official
Brian	Meloy	brian.meloy@stinson.com	STINSON LLP	50 S 6th St Ste 2600 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-743_Official
Joseph	Meyer	joseph.meyer@ag.state.mn.us	Office of the Attorney General-RUD	Bremer Tower, Suite 1400 445 Minnesota Street St Paul, MN 55101-2131	Electronic Service	No	OFF_SL_20-743_Official
Stacy	Miller	stacy.miller@minneapolismn.gov	City of Minneapolis	350 S. 5th Street Room M 301 Minneapolis, MN 55415	Electronic Service	No	OFF_SL_20-743_Official
David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022093	Electronic Service	No	OFF_SL_20-743_Official
Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP	33 South Sixth St Ste 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-743_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_20-743_Official
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_20-743_Official
Matthew	Olsen	molsen@otpco.com	Otter Tail Power Company	215 South Cascade Street Fergus Falls, MN 56537	Electronic Service	No	OFF_SL_20-743_Official
Carol A.	Overland	overland@legalectric.org	Legalectric - Overland Law Office	1110 West Avenue Red Wing, MN 55066	Electronic Service	No	OFF_SL_20-743_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
John	Pacheco	johnpachecojr@gmail.com		N/A	Electronic Service	No	OFF_SL_20-743_Official
Greg	Palmer	gpalmer@greatermngas.com	Greater Minnesota Gas, Inc. & Greater MN Transmission, LLC	1900 Cardinal Ln PO Box 798 Faribault, MN 55021	Electronic Service	No	OFF_SL_20-743_Official
Jose	Perez	jose@hispanicsinenergy.com	Hispanics in Energy	1017 L Street #719 Sacramento, CA 95814	Electronic Service	No	OFF_SL_20-743_Official
Jennifer	Peterson	jjpeterson@mnpower.com	Minnesota Power	30 West Superior Street Duluth, MN 55802	Electronic Service	No	OFF_SL_20-743_Official
Catherine	Phillips	Catherine.Phillips@wecenergygroup.com	Minnesota Energy Resources	231 West Michigan St Milwaukee, WI 53203	Electronic Service	No	OFF_SL_20-743_Official
Kevin	Pranis	kpranis@liunagroc.com	Laborers' District Council of MN and ND	81 E Little Canada Road St. Paul, Minnesota 55117	Electronic Service	No	OFF_SL_20-743_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_20-743_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_20-743_Official
Susan	Romans	sromans@allete.com	Minnesota Power	30 West Superior Street Legal Dept Duulth, MN 55802	Electronic Service	No	OFF_SL_20-743_Official
Richard	Savelkoul	rsavelkoul@martinsquires.com	Martin & Squires, P.A.	332 Minnesota Street Ste W2750 St. Paul, MN 55101	Electronic Service	No	OFF_SL_20-743_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Elizabeth	Schmiesing	eschmiesing@winthrop.com	Winthrop & Weinstine, P.A.	225 South Sixth Street Suite 3500 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-743_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_20-743_Official
Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates	7400 Lyndale Ave S Ste 190 Richfield, MN 55423	Electronic Service	No	OFF_SL_20-743_Official
Colleen	Sipiorski	Colleen.Sipiorski@wecenergygroup.com	Minnesota Energy Resources Corporation	700 North Adams St Green Bay, WI 54307	Electronic Service	No	OFF_SL_20-743_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_20-743_Official
Peggy	Sorum	peggy.sorum@centerpointenergy.com	CenterPoint Energy	505 Nicollet Mall Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-743_Official
Jamez	Staples	jstaples@renewablenrgpartners.com	Renewable Energy Partners	3033 Excelsior Blvd S Minneapolis, MN 55416	Electronic Service	No	OFF_SL_20-743_Official
Byron E.	Starns	byron.starns@stinson.com	STINSON LLP	50 S 6th St Ste 2600 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-743_Official
Richard	Stasik	richard.stasik@wecenergygroup.com	Minnesota Energy Resources Corporation (HOLDING)	231 West Michigan St - P321 Milwaukee, WI 53203	Electronic Service	No	OFF_SL_20-743_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Kristin	Stastny	kstastny@taftlaw.com	Taft Stettinius & Hollister LLP	2200 IDS Center 80 South 8th St Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-743_Official
Cary	Stephenson	cStephenson@otpco.com	Otter Tail Power Company	215 South Cascade Street Fergus Falls, MN 56537	Electronic Service	No	OFF_SL_20-743_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_20-743_Official
Eric	Swanson	eswanson@winthrop.com	Winthrop & Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_20-743_Official
Lynnette	Sweet	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	Yes	OFF_SL_20-743_Official
Stuart	Tommerdahl	stommerdahl@otpco.com	Otter Tail Power Company	215 S Cascade St PO Box 496 Fergus Falls, MN 56537	Electronic Service	No	OFF_SL_20-743_Official
Thomas	Tynes	jjazynka@energyfreedomcoalition.com	Energy Freedom Coalition of America	101 Constitution Ave NW Ste 525 East Washington, DC 20001	Electronic Service	No	OFF_SL_20-743_Official
Analeisha	Vang	avang@mnpower.com	Minnesota Power	30 W Superior St Duluth, MN 558022093	Electronic Service	No	OFF_SL_20-743_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_20-743_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Samantha	Williams	swilliams@nrdc.org	Natural Resources Defense Council	20 N. Wacker Drive Ste 1600 Chicago, IL 60606	Electronic Service	No	OFF_SL_20-743_Official
Joseph	Windler	jwindler@winthrop.com	Winthrop & Weinstine	225 South Sixth Street, Suite 3500 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-743_Official
Patrick	Zomer	Pat.Zomer@lawmoss.com	Moss & Barnett PA	150 S 5th St #1200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-743_Official