

June 6, 2022

—Via Electronic Filing—

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

RE: REPLY COMMENTS
2021 HOSTING CAPACITY ANALYSIS
DOCKET NO. E002/M-21-767

Dear Mr. Seuffert:

Northern States Power Company, doing business as Xcel Energy, submits the to the Minnesota Public Utilities Commission the enclosed Reply Comments in response to Comments filed by parties on April 4 and May 25, 2022 on our 2021 Hosting Capacity Analysis in the above-referenced proceeding.

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 Jody Londo at jody.l.londo@xcelenergy.com or (612) 330-5601 or me at bria.e.shea@xcelenergy.com or (612) 330-6064 if you have any questions regarding this filing.

Sincerely,

/s/

BRIA E. SHEA
DIRECTOR, REGULATORY & STRATEGIC ANALYSIS

Enclosures
c: Service Lists

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 XCEL ENERGY
2021 HOSTING CAPACITY REPORT UNDER
MINN. STAT. § 216B.2425, SUBD. 8

DOCKET NO. E002/M-21-767

REPLY COMMENTS

INTRODUCTION

Northern States Power Company, doing business as Xcel Energy, submits to the Minnesota Public Utilities Commission these Reply Comments in response to Comments received on the Company's 2021 Hosting Capacity Analysis (HCA) Report in the docket referenced above.

Comments were filed by the Minnesota Department of Commerce, Division of Energy Resources (Department) and the Institute for Local Self-Reliance (ILSR). We appreciate parties' detailed review of our 2021 Hosting Capacity Report, and in this Reply, we respond to their comments and recommendations. As we discuss below, we are in compliance with all of the Commission's requirements in effect at the time of our November 1, 2022 HCA Report. We continue to request the Commission to accept our 2021 HCA Report.

REPLY COMMENTS

A. Response to Department Recommendations

The Commission's July 31, 2020 Order in our 2019 HCA proceeding (Docket No. E002/M-19-685) was the most recent HCA Order in effect at the time of our filing on November 1, 2021 and thus formed the basis of our compliance matrix, provided as Attachment D to our Report. In Comments, the Department requests the Company to provide information related to Order Point No. 8 of the November 9, 2021 Order in the Company's 2020 HCA proceeding (Docket No. E002/M-20-812). This Order Point requires the Company to develop a proposal to implement the Fast

Track Supplemental Review Screen (FTSRS) Use Case in the next hosting capacity analysis report, and conduct a cost-benefit analysis for this Use Case. As we discuss below, this Order Point is not applicable in this case because the Order was issued on November 9, 2021 – after the Company filed its 2021 HCA Report on November 1, 2021. Further, even if the Order had been issued prior to the Company’s November 1, 2021 HCA Report, the timing of the hearing that lead to the Order would not have allowed for a thoughtful analysis of implementation of the FTSRS Use Case.

Given the context of Order Point 8 in relation to other Order Points, the FTSRS Use Case is very interrelated with the other potential future Use Cases the Commission ordered we further explore with stakeholders that was clearly contemplated to occur in 2022 (see Order Point 5). That said, we understand implementing the FTSRS is consistent with the Commission’s long-term goal for the HCA, and we are separately developing a proposal to be included in our 2022 HCA Report, consistent with Order Point 8. This work, however, requires the same stakeholder engagement and cost and benefit information associated with Order Point 5 to conduct the required cost-benefit analysis. There is cross-over among Order Points, and we are working diligently to comply and provide useful analysis for the Commission to make determinations on the future trajectory of the HCA.

Below we address the procedural reasons that Order Point 8 is not applicable to our 2021 HCA Report, followed by a summary of the Company’s ongoing work as we prepare for filing our next HCA Report in November 2022, in compliance with the Commission’s November 9, 2021. This discussion highlights how this FTSRS Use Case ties into our 2022 stakeholder workshop plans that are currently underway and will inform the future Use Case information we include in our next HCA Report.

1. The Commission Speaks Through its Written Orders

The Department asserts that the Company did not comply with Order Point 8 of the November 9, 2021 Order, which states:

Xcel must separately develop a proposal to implement the Fast Track Supplemental Review Screen (FTSRS) Use Case in the next hosting capacity analysis report consistent with the Commission’s long-term goal of the hosting capacity analysis and must conduct a benefit-cost analysis of the FTSRS Use Case.

For the procedural reasons discussed below, this is not a requirement for the current 2021 HCA Report. Also, practicably, given the timing of the Commission’s September 30, 2021 verbal decisions in our prior HCA proceeding, we would not have had sufficient time to develop a more refined estimate of the FTSRS Use Case,

and did not have the necessary cost and benefit information that will be needed, as noted above.

The Department observes that the Commission hearing on the Company's 2020 HCA was held on September 30, 2021, and concludes that the Company was required to comply with those verbal decisions. However, the verbal vote of the Commission is not the action of the Commission; the Commission speaks only through its written orders.¹ Additionally, Order Point 14 states that the Order shall become effective immediately, *i.e.*, on the date issued (November 9, 2021). For these reasons, this Order was not effective when we filed our 2021 HCA Report.²

That said, the Commission's Notice for Comment Period issued February 7, 2022, states that the following topic was open for comment:

- Does Xcel Energy's 2021 Hosting Capacity Analysis Report achieve the requirements outlined in the Commission's July 31, 2020 Order,³ the Commission's November 9, 2021 Order,⁴ and Minn. Stat. §216B.2425, Subd. 8?

While the Notice for Comment Period mentions the November 9, 2021 Order, only Order Point 13 specifically identifies a requirement for the 2021 HCA. The remainder of the filing requirements are associated with "future HCA reports" or "the next hosting capacity analysis report," with one filing requirement "by November 2022."⁵ With the Order effective on November 9, 2021, the next HCA report properly refers to the November 1, 2022 filing.

The compliance matrix included with our 2021 HCA Report incorporated the requirements from the July 31, 2020 Order in Docket No. E002/M-19-685. In our filing, we stated: "The Commission considered our 2020 HCA Report in its September 30, 2021 meeting. Due to this timing, we prepared this November 2021 HCA consistent with any ongoing requirements from the Commission's most recent, July 2020 Order. However, we note that none of the Commission's verbal decisions in

¹ See *In re Excelsior Energy, Inc.*, 782 N.W.2d 282, 296 (Minn. Ct. App. 2010) (The Commission "speaks only through written orders. See [Minn. Stat. § 216B.33 \(2008\)](#) (stating that all orders of the commission must be in writing).")

² We also note that the Company filed a Request for Reconsideration on November 18, 2021 related to Order Point 3, and the Commission issued an Erratum Notice on November 19, 2021.

³ ORDER ACCEPTING STUDY AND SETTING FURTHER REQUIREMENTS (July 31, 2020), Docket No. E002/M-19-685.

⁴ ORDER ACCEPTING REPORT, REQUIRING STAKEHOLDER WORKSHOPS, AND SETTING ADDITIONAL REQUIREMENTS (November 9, 2021), Docket No. E002/M-20-812.

⁵ There is also one other date-specific requirement to publish criteria violations on the hosting capacity map by May 2022. See the November 9, 2021 Order (Order Point 3) and the November 19, 2021 Erratum Notice.

the September 30, 2021 hearing impacted the hosting capacity analysis itself, such as the overall methodology or inputs.”

Although the November 9, 2021 Order had not yet been issued, we took an inclusive approach and added to the compliance matrix the one verbal decision that specifically mentions the 2021 HCA Report. The verbal decision (which became Order Point 13) requires that: “Xcel must provide, in its 2021 HCA Report, options for monthly HCA updates, including cost estimates.” In our filing, we provided a conceptual, high-level cost estimate. We also discussed that because of timing (with one month between the verbal decision and the filing date) we were not able to undertake a more detailed analysis and that we understood that this issue was also subject to the stakeholder workshops ordered by the Commission. Our discussion continued that “we have not put any more effort for developing these cost estimates and timelines until more definite outcomes from the workshops are available.”

Finally, our view is that we did not “detail in several other instances the verbal decisions at the September 30, 2021 Agenda Meeting for the 2020 Report,” as the Department Comments state. Many of the verbal decision options were repeated from the 2020 HCA Order, which is why they are addressed in the 2021 Report – not because they were verbal decisions made on September 30, 2021. Otherwise, our 2021 HCA Report only discussed the verbal decision related to Order Point 13, which required analysis on monthly HCA options in the 2021 HCA, as explained above. We also briefly mentioned in the introduction to our filing the verbal decision associated with Order Point 3, stating:

The Commission’s verbal decision also required us to publish all criteria violations on the heat map by May 2022. We are working on the technical aspects of this request, and currently anticipate that we are likely able to include all criteria violations on the heat map sooner, with the February 2022 quarterly HCA update.

Below we discuss our ongoing stakeholder efforts with respect to the future Use Cases the Commission has directed that we explore, which also is part of the practicable reasons why any information we could have provided in our November 1, 2021 HCA Report would not have been useful.

2. Preparations for Future HCA Reports

Currently, we are engaged in several initiatives as we work toward preparing to file our next HCA Report in November 2022, in compliance with the Commission’s November 9, 2021 Order. First, based on that Order, we initiated and recently completed a series of stakeholder workshops on potential HCA futures that, also in accordance with the November 9 Order, will intersect and coordinate with the

Distributed Generation Working Group (DGWG) efforts. As we outlined in our workshop plan letter filed on April 8, 2022, these workshops were designed to facilitate stakeholder engagement and solicit input on our 2022 HCA and potential future use cases, built on our past stakeholder efforts regarding potential future HCA Use Cases. These workshops covered the following topics:

April 26, 2022

- HCA Overview
- Current HCA Futures Roadmap
- HCA and Interconnection Study Attributes
- Explore HCA/Interconnection Integrations

May 24, 2022

- Continue exploration of HCA/Interconnection Integration scenarios
- Discuss Priorities and Benefits

In planning and scheduling these workshops, we were in communication with Commission Staff, who are facilitating the DGWG stakeholder process, to help ensure our timing to gather additional information to inform the later DGWG workshops would be acceptable. The Commission's November 9, 2021 Order, and specifically Order Point 10 (identifying the potential future use cases including the FTSRS in part 10.b) and Order Point 5, requires that workshops be held to provide for proposals put forward by stakeholders to incorporate the HCA into the interconnection process. The Order points specify that the Company, in collaboration with stakeholders, help identify priorities for implementation, as well as use the stakeholder input on costs and benefits to develop a cost-benefit analysis and timelines for the priorities. Order Point 5 further requires the Company to provide this information within 120 days after the workshops conclude, or in the alternative, a status update and revised timeline for providing this information. The Company will provide the information required by these Order Points in compliance with the timeline specified in the Order.

Additionally, related to Order Point 8 of the November 9, 2021 Order, the Company is working to separately develop a proposal for implementation of the FTSRS Use Case in isolation. This work, however, requires the same stakeholder cost and benefit information associated with Order Point 5 discussed above, to conduct the required cost-benefit analysis. As we noted previously, even if the Commission's verbal decisions were binding, it would have been impracticable for the Company to be able to provide any meaningful further analysis of an FTSRS use case with only 30 days between the Commission's verbal decisions and our 2021 HCA Report. In contrast, the process we believe the Commission contemplated – and that we currently have

underway to comply with the November 9 Order, which includes further engagement with stakeholders directly and through the DGWG – will indeed provide meaningful information to inform the Commission’s actions with respect to the future of our HCA.

Finally, we note that even though it is not required by the Commission’s Orders, we have planned an additional series of stakeholder workshops focused on the first-ever Load HCA we will include in our November 1, 2022 HCA Report, as follows:

June 22, 2022

- What is a Load HCA
- Proposed Approach
- Explore Use Cases
- Priorities and Benefits

July 26, 2022

- Overview of Final/Planned Approach

Post-November 2022 Filing – Date TBD

Feedback on first full Load HCA

Order Point 4 of the November 9, 2021 Order requires the Company to perform an HCA for load and file the analysis by November 2022. Based on prior feedback from stakeholders, we understand that a load HCA could provide important insight, and we believe eliciting input from interested stakeholders prior to conducting and filing our first full load HCA will be beneficial. We are holding these workshops to help align our analysis with stakeholder expectations and provide a forum for stakeholder input. Our timing allows for us to consider stakeholder feedback in our development of the first Load HCA in Minnesota, and further includes a feedback loop, as we return to engage with stakeholders after our November 2022 filing.

B. Response to ILSR

In Comments, ILSR recommends that the Commission accept Xcel Energy’s HCA Report because on the whole, it achieves the requirements outlined in the Commission’s July 31, 2020 and November 9, 2021⁶ HCA Orders and Minn. Stat. § 216B.2425, subd. 8. We appreciate ILSR’s review of our Report and

⁶ As discussed in Section A above, the November 9, 2021 Order in Docket No. E002-20-812 was not issued until after the Company filed the current 2021 HCA Report. The Company’s Compliance Matrix (Attachment D) incorporated requirements from the July 31, 2020 Order, which was the most recent HCA Order in effect at the time of filing on November 1, 2021.

recommendation for acceptance. ILSR also provides comments on specific items, which we respond to below.

1. *Hosting Capacity Map and Grid Security*

ILSR notes that Xcel Energy's hosting capacity online map is a functional and useful representation of the HCA Report, and the Company is in compliance with the Commission's July 31, 2020 Order regarding criteria threshold violations.⁷ However, ILSR also states that the "Xcel, the Commission, and intervenors are addressing the Company's noncompliance with Order Point 12" in the *Commission Investigation on Grid and Customer Security Issues Related to Public Display or Access to Electric Distribution Grid Data* in Docket No. E999/M-20-800. We disagree with that characterization. In the 2020 HCA proceeding, the Commission did not find that the Company was "noncompliant" with Order Point 12.

Order Point 12 of the July 31, 2020 Order states:

In its 2020 HCA Report, Xcel must, **to the extent practicable**, show the actual locations of distribution system lines instead of broad blocks of color on the HCA map. [Emphasis added]

In our 2020 HCA proceeding, the Commission noted that the Company did not show exact locations of distribution lines, but the Company described its concerns in detail in Attachment E to the 2020 Report.⁸ Indeed by the time Company had filed its 2020 HCA Report, the Commission had already opened its investigation into the public display of distribution system information,⁹ where grid security issues would be addressed for all utilities. We expect the public display of grid information as it relates to Order Point 12 above will be addressed in future HCA Reports after being informed by outcomes from the grid security proceeding.

2. *HCA and Interconnection Process Integration*

ILSR notes the progress to-date toward integration of the HCA and the interconnection process, specifically related to the change the Company has made to align the power factor for DER sites in the HCA to be consistent with the

⁷ Order Point 15 of the July 31, 2020 Order required criteria violations to be provided in tabular form and on the HCA map with appropriate caveats. However, with the February 1, 2022 quarterly HCA update, the Company began to publish all criteria violations on our HCA heat map, in compliance with Order Point 3 of the Commission's November 9, 2021 Order in Docket No. E002/M-21-812, which directed the Company to begin doing this by May 2022.

⁸ Commission Order, Docket No. E002/M-20-812, November 9, 2021, p. 4.

⁹ See Docket No. E999/CI-20-800 established by Commission Notice dated October 30, 2020.

interconnection study process. However, ILSR notes that additional work is needed, specifically stating that queued DER projects should be treated as operational in the HCA. As ILSR notes, the Company addressed this issue in its HCA Report, stating that to include queued DER projects in the HCA “would create too much variability as many projects enter and exit the queue during the [hosting capacity] analysis period.”¹⁰ ILSR notes this could be mitigated by conducting a monthly hosting capacity analysis, which is a change necessary for integrating the HCA with the interconnection process. A monthly HCA cadence, including examination of costs and benefits, is part of the ongoing stakeholder work and Xcel Energy analysis required by the Commission’s November 9 Order, as discussed above.

We additionally note that we have taken other actions to align the HCA and interconnection process. Namely, we have aligned Hosting Capacity criteria with the interconnection screen and study requirements, utilized hosting capacity models for the interconnection screens and studies when able, and increased the cadence of the hosting capacity analysis to better align HCA results with existing DERs in the field.

Finally, ILSR recommended that the Commission should hold stakeholder workshops with Xcel Energy and industry experts to develop the load hosting capacity analysis methodology. As discussed above, we have initiated a stakeholder workshop series focused on our Load HCA. We note here that ILSR filed their Comments on April 4, and as such, would not yet have been aware of the Company’s stakeholder engagement plans because we filed our 2022 workshop plan on April 8, 2022. We are looking forward to engaging with ILSR and other stakeholders on this new aspect of our HCA Report.

CONCLUSION

Xcel Energy appreciates the opportunity to provide these Reply Comments that further explain our 2021 Hosting Capacity Report and respond to parties’ Comments.

Dated: June 6, 2022

Northern States Power Company

¹⁰ See Xcel Energy’s 2021 HCA Report, p. 12.

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

xx electronic filing

Docket Nos. E002/M-21-767

Dated this 6th day of June 2022

/s/

Mustafa Adam
Regulatory Administrator

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Roxanne	Achman	rachman@co.benton.mn.us		531 Dewey Street Foley, MN 56329	Electronic Service	No	OFF_SL_21-767_M-21-767
Alison C	Archer	aarcher@misoenergy.org	MISO	2985 Ames Crossing Rd Eagan, MN 55121	Electronic Service	No	OFF_SL_21-767_M-21-767
James J.	Bertrand	james.bertrand@stinson.com	STINSON LLP	50 S 6th St Ste 2600 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-767_M-21-767
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_21-767_M-21-767
John	Coffman	john@johncoffman.net	AARP	871 Tuxedo Blvd. St, Louis, MO 63119-2044	Electronic Service	No	OFF_SL_21-767_M-21-767
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_21-767_M-21-767
Riley	Conlin	riley.conlin@stoel.com	Stoel Rives LLP	33 S. 6th Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-767_M-21-767
Brooke	Cooper	bcooper@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022191	Electronic Service	No	OFF_SL_21-767_M-21-767
George	Crocker	gwillc@nawo.org	North American Water Office	PO Box 174 Lake Elmo, MN 55042	Electronic Service	No	OFF_SL_21-767_M-21-767
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_21-767_M-21-767

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_21-767_M-21-767
Edward	Garvey	edward.garvey@AESLconsulting.com	AESL Consulting	32 Lawton St Saint Paul, MN 55102-2617	Electronic Service	No	OFF_SL_21-767_M-21-767
Janet	Gonzalez	Janet.gonzalez@state.mn.us	Public Utilities Commission	Suite 350 121 7th Place East St. Paul, MN 55101	Electronic Service	No	OFF_SL_21-767_M-21-767
Kim	Havey	kim.havey@minneapolismn.gov	City of Minneapolis	350 South 5th Street, Suite 315M Minneapolis, MN 55415	Electronic Service	No	OFF_SL_21-767_M-21-767
Adam	Heinen	aheinen@dakotaelectric.com	Dakota Electric Association	4300 220th St W Farmington, MN 55024	Electronic Service	No	OFF_SL_21-767_M-21-767
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_21-767_M-21-767
Alan	Jenkins	aj@jenkinsatlaw.com	Jenkins at Law	2950 Yellowtail Ave. Marathon, FL 33050	Electronic Service	No	OFF_SL_21-767_M-21-767
Richard	Johnson	Rick.Johnson@lawmoss.com	Moss & Barnett	150 S. 5th Street Suite 1200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-767_M-21-767
Sarah	Johnson Phillips	sarah.phillips@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-767_M-21-767
Thomas	Koehler	TGK@IBEW160.org	Local Union #160, IBEW	2909 Anthony Ln St Anthony Village, MN 55418-3238	Electronic Service	No	OFF_SL_21-767_M-21-767

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Peder	Larson	plarson@larkinhoffman.com	Larkin Hoffman Daly & Lindgren, Ltd.	8300 Norman Center Drive Suite 1000 Bloomington, MN 55437	Electronic Service	No	OFF_SL_21-767_M-21-767
Kavita	Maini	kmairi@wi.rr.com	KM Energy Consulting, LLC	961 N Lost Woods Rd Oconomowoc, WI 53066	Electronic Service	No	OFF_SL_21-767_M-21-767
Pam	Marshall	pam@energycents.org	Energy CENTS Coalition	823 7th St E St. Paul, MN 55106	Electronic Service	No	OFF_SL_21-767_M-21-767
Maria	McCoy	maria@ilsr.org	Institute for Local Self-Reliance	2720 E 22nd St. Minneapolis, MN 55406	Electronic Service	No	OFF_SL_21-767_M-21-767
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_21-767_M-21-767
Stacy	Miller	stacy.miller@minneapolismn.gov	City of Minneapolis	350 S. 5th Street Room M 301 Minneapolis, MN 55415	Electronic Service	No	OFF_SL_21-767_M-21-767
David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022093	Electronic Service	No	OFF_SL_21-767_M-21-767
Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP	33 South Sixth St Ste 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-767_M-21-767
David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency	220 South Sixth Street Suite 1300 Minneapolis, Minnesota 55402	Electronic Service	No	OFF_SL_21-767_M-21-767
Carol A.	Overland	overland@legalelectric.org	Legalelectric - Overland Law Office	1110 West Avenue Red Wing, MN 55066	Electronic Service	No	OFF_SL_21-767_M-21-767

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_21-767_M-21-767
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_21-767_M-21-767
Isabel	Ricker	ricker@fresh-energy.org	Fresh Energy	408 Saint Peter Street Suite 220 Saint Paul, MN 55102	Electronic Service	No	OFF_SL_21-767_M-21-767
Richard	Savelkoul	rsavelkoul@martinsquires.com	Martin & Squires, P.A.	332 Minnesota Street Ste W2750 St. Paul, MN 55101	Electronic Service	No	OFF_SL_21-767_M-21-767
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_21-767_M-21-767
Bria	Shea	bria.e.shea@xcelenergy.com	Xcel Energy	414 Nicollet Mall Minneapolis, MN 55401	Electronic Service	No	OFF_SL_21-767_M-21-767
Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.	76 W Kellogg Blvd St. Paul, MN 55102	Electronic Service	No	OFF_SL_21-767_M-21-767
Sky	Stanfield	stanfield@smwlaw.com	Shute, Mihaly & Weinberger	396 Hayes Street San Francisco, CA 94102	Electronic Service	No	OFF_SL_21-767_M-21-767
Byron E.	Starns	byron.starns@stinson.com	STINSON LLP	50 S 6th St Ste 2600 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-767_M-21-767
James M	Strommen	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered	150 S 5th St Ste 700 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-767_M-21-767

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Eric	Swanson	eswanson@winthrop.com	Winthrop & Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_21-767_M-21-767
Lynnette	Sweet	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_21-767_M-21-767
Thomas	Tynes	N/A	Energy Freedom Coalition of America	101 Constitution Ave NW Ste 525 East Washington, DC 20001	Paper Service	No	OFF_SL_21-767_M-21-767
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_21-767_M-21-767
Joseph	Windler	jwindler@winthrop.com	Winthrop & Weinstine	225 South Sixth Street, Suite 3500 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-767_M-21-767
Yochi	Zakai	yzakai@smwlaw.com	SHUTE, MIHALY & WEINBERGER LLP	396 Hayes Street San Francisco, CA 94102	Electronic Service	No	OFF_SL_21-767_M-21-767
Patrick	Zomer	Pat.Zomer@lawmoss.com	Moss & Barnett PA	150 S 5th St #1200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-767_M-21-767