



414 Nicollet Mall
Minneapolis, MN 55401

June 21, 2022

—Via Electronic Filing—

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

RE: REPLY COMMENTS
PETITION FOR APPROVAL OF AN ELECTRIC CONSERVATION IMPROVEMENT
PROGRAM ADJUSTMENT FACTOR
DOCKET NO. E002/M-22-158

Dear Mr. Seuffert:

Northern States Power Company, doing business as Xcel Energy, submits to the Minnesota Public Utilities Commission these Reply Comments in the above referenced Docket. In Comments, the Minnesota Department of Commerce, Division of Energy Resources (“Department”) required the Company to provide: (1) An updated 2021 tracker corrected for electric/gas CEE One Stop recording error; and (2) Updated 2021 Electric Shared Savings DSM calculations.

These details are provided in Attachment A to these Reply Comments. Based on these changes, the Company recommends approval of our CIP Tracker as filed on April 1, 2022. Based on the Commission’s approval, we will then move forward to provide a compliance filing updating the 2022 CIP Tracker with both the appropriate allocations between electric and natural gas, the approved incentive, and to-date actual spending which will appropriately adjust the DSM Riders.

A. Background

As noted in the Department’s June 8, 2022 Comments at page 3:

In its calculations Xcel noted that the Center for Energy and Environment (CEE)’s One Stop Shop Natural Gas measures were incorrectly recorded in the 2021 electric tracker and will be corrected in the 2022 electric tracker.

The Company's CEE One Stop recording error occurred in December 2021 when \$71,421 spend, including both customer incentives and administration, for natural gas measures from CEE's One Stop program was added to the Electric CIP Tracker.

B. 2021 Tracker

The Company provides an updated 2021 CIP Tracker in Attachment A. This is a hypothetical adjustment to the 2021 CIP Tracker to show what would have occurred in absence of the error. Our accounting structure has closed for the 2021 period and therefore an actual adjustment cannot be retroactively adjusted.¹

C. Updated 2021 Electric Shared Savings DSM Calculations

Per the Department's request, we have additionally updated our 2021 Electric Shared Savings Calculations as shown in Attachment A. By adjusting the actual expenditures to reflect the removal of \$71,421, the electric incentive has increased by \$7,142 for a total of \$26,888,142. We note a corresponding decrease of \$7,142 in our 2021 Natural Gas Shared Savings Calculation. This incentive will be updated in our 2022 DSM Tracker in our future compliance filing.

D. Recommendation

The Company recommends approval of:

- our 2021 CIP Tracker account as filed on April 1, 2022;
- the updated incentive of \$26,888,142; and
- 2022/2023 electric CIP Adjustment Factor of \$0.002506 per kWh; subject to an updated compliance filing including a decrease of \$71,421 in July 2022, updated incentive as approved, and to-date spending.

To maintain consistency between our accounting records and the CIP Tracker, we recommend creating an adjustment between electric and natural gas within the 2022 CIP Tracker rather than retroactively addressing in 2021 which will create differing numbers between tracker, our CIP Status Report, and accounting books. The adjustment of \$71,421 from the electric to natural gas will appear as an "other adjustment." Carrying charges will also be adjusted accordingly.

¹ The Company has discussed this matter with Department Staff and articulated its preference for approval of the Trackers as filed in order to keep the year-end 2021 Tracker balances in alignment with the Company's accounting records. Staff indicated that they understood the Company's preference and would make a recommendation following review of the information provided in these Reply Comments.

The Company will provide an updated CIP Factor, bill language, and DSM shared savings calculations in our Compliance Filing upon approval of the Commission.

We have electronically filed this document with the Minnesota Public Utilities Commission, and copies have been served to the parties on the attached service list. Please contact Becky Billings at becky.j.billings@xcelenergy.com or 612-702-1730 if you have any questions regarding this filing.

Sincerely,

/s/

NICK MARK
MANAGER, PERFORMANCE AND STRATEGY, XCEL ENERGY

c: Service List

Northern States Power Company, a Minnesota Corporation														
State of Minnesota - Electric Utility														
DSM Cost Recovery & Incentive Mechanism - Total														
2021 Actuals (w/ CEE Other Adjustment)														
		Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Annual
	EXPENSES	Actual	Actual	Actual	Actual	Actual	Actual	Actual	Actual	Actual	Actual	Actual	Actual	Actual
1	Balance	6,960,280	10,179,058	11,277,011	10,767,657	8,603,424	4,954,862	1,942,755	(4,810,764)	(12,335,068)	17,216,897	10,855,067	4,938,027	
1a	Other Adjustments	55,471											(71,421)	
2	CIP Program Expenditures	14,243,634	11,256,705	10,091,705	7,176,334	7,057,226	10,187,371	7,123,660	6,344,247	10,142,723	8,216,594	7,999,300	9,609,913	109,449,411
3	2020 Performance Incentive									30,500,073				30,500,073
4	Total Expenses + Incentive (Line 1 + 2 + 3)	21,259,385	21,435,763	21,368,716	17,943,991	15,660,650	15,142,233	9,066,415	1,533,483	28,307,728	25,433,491	18,854,368	14,476,520	
RECOVERY														
5	CCRC Rate (\$ / MWh)	3.133	3.133	3.133	3.133	3.133	3.133	3.133	3.133	3.133	3.133	3.133	3.133	
6	CCRC Cost Recovery (CCRC * Sales)	6,985,450	6,407,517	6,684,921	5,888,676	6,741,639	8,305,402	8,721,032	8,703,753	7,003,141	6,876,971	6,558,256	7,016,040	85,892,798
7	CIP Adjustment Factor Rate (\$ / MWh)	1.8480	1.8480	1.8480	1.8480	1.8480	1.8480	1.8480	1.8480	1.8480	3.5210	3.5210	3.5210	
8	CIP Adjustment Factor Recovery (Factor * Sales)	4,120,367	3,779,474	3,943,101	3,473,436	3,976,556	4,898,941	5,144,100	5,133,909	4,130,803	7,728,635	7,370,450	7,884,927	61,584,699
9	Sub-Balance (Line 4 - 6 - 8)	10,153,569	11,248,772	10,740,694	8,581,880	4,942,455	1,937,890	(4,798,717)	(12,304,179)	17,173,784	10,827,885	4,925,662	(424,447)	
10	Accum. Deferred Tax (Line 9 * 28.742%)	2,918,339	3,233,122	3,087,090	2,466,604	1,420,560	556,988	(1,379,247)	(3,536,467)	4,936,089	3,112,151	1,415,734	(121,995)	
11	Net Investment (Line 9-10)	7,235,230	8,015,650	7,653,604	6,115,276	3,521,895	1,380,902	(3,419,470)	(8,767,712)	12,237,695	7,715,734	3,509,928	(302,452)	
12	Carrying Charge (Line 11 * Carrying Charge Rate)	25,490	28,239	26,964	21,544	12,408	4,865	(12,047)	(30,889)	43,113	27,183	12,365	(1,066)	158,170
13	End of Month Balance (Line 9 + 12)	10,179,058	11,277,011	10,767,657	8,603,424	4,954,862	1,942,755	(4,810,764)	(12,335,068)	17,216,897	10,855,067	4,938,027	(425,513)	
Xcel Energy - Minnesota														
Calculation of Cost of Capital for Test Year 2021														
2019 Electric Multi-Year Rate Case (Docket No. E002/GR15-826)														
Carrying Charge Rate = 0.3523%														
CCRC Rate = \$3.133 per MWh Begin Oct 2017														

Table 19: 2021 Electric CIP Tracker (DSM Cost Recovery) (w/ CEE Other Adjustment)

Table 19. 2021 Electric CIP Tracker (DSM Cost Recovery) (w/ CEE Other Adjustment)

Northern States Power Company
a Minnesota corporation
Corrected 2021 Financial Incentive Calculations

Northern States Power Company, doing business as Xcel Energy, Per the Department's request, has updated the 2021 Electric and Natural Gas Shared Savings Calculations.

In accordance with the Minnesota PUC Orders dated January 27, 2010, August 5, 2016 and February 20, 2020 (Docket No. E,G999/CI-08-133), Xcel Energy respectfully submits these financial incentive calculations. In 2021, the Company achieved electric energy savings of 743,837,488 kWh at the generator at a cost of \$109,504,882. As a result, we respectfully request approval of our CIP electric financial incentive in the amount of \$26,888,142.

CIP Electric Financial Incentive Calculation

According to Orders in Docket No. E,G999/CI-08-133, certain expenses and savings are excluded from the incentive calculation, including regulatory assessments, electric utility infrastructure projects, qualifying solar projects, and third party projects not selected for inclusion in the annual incentive compliance filing. As first stated in our January 30, 2013 incentive compliance filing and continued through the 2021-2022 filings, we elected to include the One Stop Shop program administered by the Center for Energy and the Environment (CEE).¹ The indirect impact third party programs—Enerchange, Energy Intelligence, Energy Smart, and Trillion Btu—are not included in the calculation of the incentive. In addition, during the 2013 Legislature, a provision was added to MN Statute 216B.241, subdivision 7, which allows utilities to exclude the net benefits of low-income programs from the calculation of net benefits for the incentive if the net benefits are negative.

Model Year Inputs

3-year Weather Normalized Sales Average (kWh)	27,807,301,870
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Incentive Mechanism

Max Percent of Net Benefits Awarded	10.0%
Max Percent Expenditures Awarded (up to 2% achievement)	30.0%
Max Percent Expenditures Awarded (more than, equal to 2% achievement)	35.0%
Earnings Threshold	1.0%
Net Benefits Cap Achievement Level	1.7%
Increase in Net Benefits Awarded Per 0.1% Increase in Achievement Level	0.75%

Summary of 2021 Achievements

Actual Spending for Incentive ²	\$106,408,756
Actual Energy Savings (kWh) ³	743,837,488
Net Benefits Achieved ⁴	\$268,881,424

¹ Docket No. E,G999/CI-08-133 and Docket No. E,G002/CI-10-81.

² Portfolio Subtotal spend plus CEE One-Stop Shop spend. This number excludes \$71,422 of spend that should have been allocated to natural gas. The One-Stop natural gas spend will be corrected in the 2022 tracker See the Alternative Filings & Assessments section for more information.

³ Portfolio Subtotal energy savings plus CEE One-Stop Shop energy savings.

⁴ The net benefits are equal to the utility test net benefits shown on Electric CIP Total cost-benefit analysis plus the

utility test net benefits shown on the CEE One Stop Shop cost-benefit analysis, included in the Cost-Effectiveness Section. Excludes any net costs from low-income programs that failed the Utility Test.

2021 Financial Incentive Mechanism

In order to calculate the CIP financial incentive, it is necessary to calculate the percent of net benefits awarded. The following calculations and incentive table detail Xcel Energy's financial incentive.

Percent of Sales Achievement Level =

$$\frac{\text{Actual Energy Savings (kWh)}}{\text{3-year Weather Normalized Sales Average (kWh)}} =$$

$$743,837,488 / 27,807,301,870$$

$$= 2.67\%$$

Percent of Net Benefits Awarded =

Max Percent of Net Benefits Awarded – Increase in Net Benefits Awarded Per 0.1% Increase in Achievement Level x (Amount the % of Sales Achievement is below the Net Benefits Cap Achievement) / 0.1% =

$$= 10.0\% - 0.75\% \times 0^5 / 0.1\%$$

$$= 10.0\%$$

Expenditures Award Cap (for >=2.0%) achievement =

Max Percent Expenditures Awarded x Actual Spend for Incentive =

$$35\% \times \$106,408,756$$

$$= \$37,243,065$$

Incentive Awarded =

Net Benefits Achieved x Percent of Net Benefits Awarded =

$$\$268,881,424 \times 10.0\%$$

$$= \$26,888,142$$

2021 Electric Incentive Request

Based on the above calculation, Xcel Energy respectfully requests approval of a CIP financial incentive of \$26,888,142 for its 2021 electric achievements.

⁵ % of Sales Achievement is greater than Net Benefits Cap Achievement Level. Therefore, no adjustment is made to the Percent of Net Benefits Awarded.

Northern States Power Company
a Minnesota corporation
Corrected 2021 Natural Gas Incentive Calculation

In accordance with the Minnesota PUC Orders dated January 27, 2010, August 5, 2016 and February 20, 2020 (Docket No. E,G999/CI-08-133), Xcel Energy respectfully submits these financial incentive calculations.

In 2021, Xcel Energy achieved energy savings of 1,170,229 Dth at a cost of \$18,699,980. As a result, we respectfully request approval of our financial incentive in the amount of \$5,013,004.

According to Orders in Docket No. E,G999/CI-08-133, certain expenses and savings are excluded from the natural gas incentive calculation, including regulatory assessments and third party projects not selected for inclusion in the annual incentive compliance filing. As stated in our January 30, 2013 incentive compliance filing and maintained through our 2021-2023 filing, we elected to include the One Stop Shop program administered by the Center for Energy and the Environment (CEE).⁶ The indirect impact third party programs—Enerchange, Energy Intelligence, Energy Smart, and Trillion Btu—are not included in the calculation of the incentive.⁷

Model Year Inputs

3-yr Weather Normalized Sales Average (Dth)	76,465,185
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Incentive Mechanism

Max Percent of Net Benefits Awarded	10.0%
Max Percent Expenditures Awarded (up to 1.2% achievement)	30.0%
Max Percent Expenditures Awarded (more than, equal to 1.2% achievement)	35.0%
Earnings Threshold	0.7%
Net Benefits Cap Achievement Level	1.2%
Increase in Net Benefits Awarded Per 0.1% Increase in Achievement Level	0.75%

Summary of 2021 Achievements

Actual Spending for Incentive ⁸	\$18,219,857
Actual Energy Savings (Dth)	1,170,229
Net Benefits Achieved ⁹	\$ 5,013,004

⁶ Docket No. E,G999/CI-08-133 and Docket No. E,G002/CI-10-81.

⁷ Docket No. E,G999/CI-08-133 and Docket No. G002/M-16-108.

⁸ This does include spending through the CEE One-Stop Shop on natural gas measures that was incorrectly recorded in 2021. The One-Stop natural gas spend will be corrected in the 2022 tracker.

⁹ The net benefits are equal to the utility test net benefits shown on the Total Gas CIP with Indirect Participants BENCOST sheet included in the Cost-Effectiveness section. Excludes any net costs from low-income programs that failed the Utility Test.

2021 Financial Incentive Mechanism

In order to calculate the financial incentive achieved, it is necessary to calculate the percent of net benefits awarded. The following calculations and incentive table detail Xcel Energy's financial incentive.

Percent of Sales Achievement Level =

Actual Energy Savings (Dth) / 3-year Weather Normalized Sales Average (Dth) =

1,170,229 / 76,465,185

= 1.53%

Percent of Net Benefits Awarded =

Max Percent of Net Benefits Awarded – Increase in Net Benefits Awarded Per 0.1% Increase in Achievement Level x (% of Sales Achievement Level less than Net Benefits Cap Achievement Level) / 0.1% =

10.0% - 0.75% x 0¹⁰ / 0.1% =

= 10%

Expenditures Award Cap (for >=1.2%) achievement =

Max Percent Expenditures Awarded x Actual Spend for Incentive =

35% x \$18,219,857

= \$6,376,950

Incentive Awarded =

Net Benefits Achieved x Percent of Net Benefits Awarded =

\$50,130,042 x 10%

= \$5,013,004

2021 Natural Gas Incentive Request

Based on the above calculation, Xcel Energy respectfully requests approval of a CIP financial incentive of \$5,013,0014 for its 2021 natural gas achievements.

¹⁰ Percent of Sales Achievement is greater than Net Benefits Cap Achievement Level. Therefore, no adjustment is made to the Percent of Net Benefits Awarded.

CERTIFICATE OF SERVICE

I, Christine Schwartz , 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; or

xx by electronic filing.

Docket No.: 22-158

Dated this 21st day of June 2022.

/s/

Christine Schwartz
Regulatory Administrator

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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency	220 South Sixth Street Suite 1300 Minneapolis, Minnesota 55402	Electronic Service	No	OFF_SL_22-158_M-22-158
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_22-158_M-22-158
Carol A.	Overland	overland@legalelectric.org	Legalelectric - Overland Law Office	1110 West Avenue Red Wing, MN 55066	Electronic Service	No	OFF_SL_22-158_M-22-158
Audrey	Partridge	apartridge@mncee.org	Center for Energy and Environment	212 3rd Ave. N. Suite 560 Minneapolis, Minnesota 55401	Electronic Service	No	OFF_SL_22-158_M-22-158
Lisa	Pickard	lseverson@minnkota.com	Minnkota Power Cooperative	5301 32nd Ave S Grand Forks, ND 58201	Electronic Service	No	OFF_SL_22-158_M-22-158
Bill	Poppert	info@technologycos.com	Technology North	2433 Highwood Ave St. Paul, MN 55119	Electronic Service	No	OFF_SL_22-158_M-22-158
Dave	Reinke	dreinke@dakotaelectric.com	Dakota Electric Association	4300 220th St W Farmington, MN 55024-9583	Electronic Service	No	OFF_SL_22-158_M-22-158
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_22-158_M-22-158
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_22-158_M-22-158

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Richard	Savelkoul	rsavelkoul@martinsquires.com	Martin & Squires, P.A.	332 Minnesota Street Ste W2750 St. Paul, MN 55101	Electronic Service	No	OFF_SL_22-158_M-22-158
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_22-158_M-22-158
Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.	76 W Kellogg Blvd St. Paul, MN 55102	Electronic Service	No	OFF_SL_22-158_M-22-158
Anna	Sommer	ASommer@energyfuturesgroup.com	Energy Futures Group	PO Box 692 Canton, NY 13617	Electronic Service	No	OFF_SL_22-158_M-22-158
Russ	Stark	Russ.Stark@ci.stpaul.mn.us	City of St. Paul	390 City Hall 15 West Kellogg Boulevard Saint Paul, MN 55102	Electronic Service	No	OFF_SL_22-158_M-22-158
Byron E.	Starns	byron.starns@stinson.com	STINSON LLP	50 S 6th St Ste 2600 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_22-158_M-22-158
James M	Strommen	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered	150 S 5th St Ste 700 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_22-158_M-22-158
Eric	Swanson	eswanson@winthrop.com	Winthrop & Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	Yes	OFF_SL_22-158_M-22-158
Lynnette	Sweet	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	Yes	OFF_SL_22-158_M-22-158

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Thomas	Tynes	N/A	Energy Freedom Coalition of America	101 Constitution Ave NW Ste 525 East Washington, DC 20001	Paper Service	No	OFF_SL_22-158_M-22-158
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_22-158_M-22-158
Kodi	Verhalen	kverhalen@taftlaw.com	Taft Stettinius & Hollister LLP	80 S 8th St Ste 2200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_22-158_M-22-158
Michael	Volker	mvolker@eastriver.coop	East River Electric Power Coop	211 S. Harth Ave Madison, SD 57042	Electronic Service	No	OFF_SL_22-158_M-22-158
Sharon N.	Walsh	swalsh@shakopeeutilities.com	Shakopee Public Utilities	255 Sarazin St Shakopee, MN 55379	Electronic Service	No	OFF_SL_22-158_M-22-158
Ethan	Warner	ethan.warner@centerpoint energy.com	CenterPoint Energy	505 Nicollet Mall Minneapolis, Minnesota 55402	Electronic Service	No	OFF_SL_22-158_M-22-158
Joseph	Windler	jwindler@winthrop.com	Winthrop & Weinstine	225 South Sixth Street, Suite 3500 Minneapolis, MN 55402	Electronic Service	Yes	OFF_SL_22-158_M-22-158
Robyn	Woeste	robynwoeste@alliantenergy.com	Interstate Power and Light Company	200 First St SE Cedar Rapids, IA 52401	Electronic Service	No	OFF_SL_22-158_M-22-158
Patrick	Zomer	Pat.Zomer@lawmoss.com	Moss & Barnett PA	150 S 5th St #1200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_22-158_M-22-158

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Tom	Balster	tombalster@alliantenergy.com	Interstate Power & Light Company	PO Box 351 200 1st St SE Cedar Rapids, IA 524060351	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Lisa	Beckner	lbeckner@mnpower.com	Minnesota Power	30 W Superior St Duluth, MN 55802	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
William	Black	bblack@mmua.org	MMUA	Suite 200 3131 Fernbrook Lane North Plymouth, MN 55447	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Christina	Brusven	cbrusven@fredlaw.com	Fredrikson Byron	200 S 6th St Ste 4000 Minneapolis, MN 554021425	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Charlie	Buck	charlie.buck@oracle.com	Oracle	760 Market St FL 4 San Francisco, CA 94102	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Ray	Choquette	rchoquette@agp.com	Ag Processing Inc.	12700 West Dodge Road PO Box 2047 Omaha, NE 68103-2047	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Generic Notice	Commerce Attorneys	commerce.attorneys@agate.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
George	Crocker	gwillc@nawo.org	North American Water Office	PO Box 174 Lake Elmo, MN 55042	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Patrick	Deal	pdeal@mnchamber.com	Minnesota Chamber of Commerce	400 Robert St N Ste 1500 Saint Paul, MN 55101	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Steve	Downer	sdowner@mmua.org	MMUA	3025 Harbor Ln N Ste 400 Plymouth, MN 554475142	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Charles	Drayton	charles.drayton@enbridge.com	Enbridge Energy Company, Inc.	7701 France Ave S Ste 600 Edina, MN 55435	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Jim	Erchul	jerschul@dbnhs.org	Daytons Bluff Neighborhood Housing Sv.	823 E 7th St St. Paul, MN 55106	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Greg	Ernst	gaernst@q.com	G. A. Ernst & Associates, Inc.	2377 Union Lake Trl Northfield, MN 55057	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Melissa S	Feine	melissa.feine@semcac.org	SEMCAC	PO Box 549 204 S Elm St Rushford, MN 55971	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 551012198	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Karolanne	Foley	Karolanne.foley@dairylandpower.com	Dairyland Power Cooperative	PO Box 817 La Crosse, WI 54602-0817	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Rob	Friend	rfriend@mnychamber.com	Minnesota Chamber of Commerce - MN Waste Wise Foundation	400 Robert St N Ste 1500 Saint Paul, MN 55101	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Jenny	Glumack	jenny@mrea.org	Minnesota Rural Electric Association	11640 73rd Ave N Maple Grove, MN 55369	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Angela E.	Gordon	agordon@trccompanies.com	Lockheed Martin	1000 Clark Ave. St. Louis, MO 63102	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Pat	Green	N/A	N Energy Dev	City Hall 401 E 21st St Hibbing, MN 55746	Paper Service	No	SPL_SL__CIP SPECIAL SERVICE LIST

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Jason	Grenier	jgrenier@otpc.com	Otter Tail Power Company	215 South Cascade Street Fergus Falls, MN 56537	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Jeffrey	Haase	jhaase@grenergy.com	Great River Energy	12300 Elm Creek Blvd Maple Grove, MN 55369	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Tony	Hainault	anthony.hainault@co.henn epin.mn.us	Hennepin County DES	701 4th Ave S Ste 700 Minneapolis, MN 55415-1842	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
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Patty	Hanson	phanson@rpu.org	Rochester Public Utilities	4000 E River Rd NE Rochester, MN 55906	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Norm	Harold	N/A	NKS Consulting	5591 E 180th St Prior Lake, MN 55372	Paper Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Jared	Hendricks	jared.hendricks@owatonna utilities.com	Owatonna Municipal Public Utilities	PO Box 800 208 S Walnut Ave Owatonna, MN 55060-2940	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
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Dave	Johnson	dave.johnson@aeoa.org	Arrowhead Economic Opportunity Agency	702 3rd Ave S Virginia, MN 55792	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Deborah	Knoll	dknoll@mnpower.com	Minnesota Power	30 W Superior St Duluth, MN 55802	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Tina	Koecher	tkoecher@mnpower.com	Minnesota Power	30 W Superior St Duluth, MN 558022093	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
Kelly	Lady	kellyl@austinutilities.com	Austin Utilities	400 4th St NE Austin, MN 55912	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
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Corey	Lubovich	coreyl@hpuc.com	Hibbing Public Utilities Commission	1902 6th Ave E Hibbing, MN 55746	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
Pam	Marshall	pam@energycents.org	Energy CENTS Coalition	823 7th St E St. Paul, MN 55106	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
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John	McWilliams	John.McWilliams@DairylandPower.com	Dairyland Power Cooperative	3200 East Ave SPO Box 817 La Crosse, WI 54601-7227	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
Brian	Meloy	brian.meloy@stinson.com	STINSON LLP	50 S 6th St Ste 2600 Minneapolis, MN 55402	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Andrew	Moratzka	andrew.moratzka@stoel.com	Steel Rives LLP	33 South Sixth St Ste 4200 Minneapolis, MN 55402	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
Carl	Nelson	cnelson@mncee.org	Center for Energy and Environment	212 3rd Ave N Ste 560 Minneapolis, MN 55401	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
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Audrey	Partridge	apartridge@mncee.org	Center for Energy and Environment	212 3rd Ave. N. Suite 560 Minneapolis, Minnesota 55401	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
Lisa	Pickard	lseverson@minnkota.com	Minnkota Power Cooperative	5301 32nd Ave S Grand Forks, ND 58201	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
Bill	Poppert	info@technologycos.com	Technology North	2433 Highwood Ave St. Paul, MN 55119	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
Dave	Reinke	dreinke@dakotaelectric.com	Dakota Electric Association	4300 220th St W Farmington, MN 55024-9583	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
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	No	SPL_SL_CIP SPECIAL SERVICE LIST
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th PI E Ste 350 Saint Paul, MN 55101	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.	76 W Kellogg Blvd St. Paul, MN 55102	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Anna	Sommer	ASommer@energyfuturesgroup.com	Energy Futures Group	PO Box 692 Canton, NY 13617	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Russ	Stark	Russ.Stark@ci.stpaul.mn.us	City of St. Paul	390 City Hall 15 West Kellogg Boulevard Saint Paul, MN 55102	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Lynnette	Sweet	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Kodi	Verhalen	kverhalen@taftlaw.com	Taft Stettinius & Hollister LLP	80 S 8th St Ste 2200 Minneapolis, MN 55402	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Michael	Volker	mvolker@eastriver.coop	East River Electric Power Coop	211 S. Harth Ave Madison, SD 57042	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
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Ethan	Warner	ethan.warner@centerpointenergy.com	CenterPoint Energy	505 Nicollet Mall Minneapolis, Minnesota 55402	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Robyn	Woeste	robynwoeste@alliantenergy.com	Interstate Power and Light Company	200 First St SE Cedar Rapids, IA 52401	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST