

April 11, 2022

William Seuffert
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
Saint Paul, MN 55101

RE: Docket No. E002/M-21-694 Xcel Energy 2022-2031 Integrated Distribution Plan

Dear Mr. Seuffert:

The City of Minneapolis ("Minneapolis") thanks the Commission for the opportunity to provide these Reply Comments on Xcel Energy's ("Xcel" or "the Company") Integrated Distribution Plan (IDP).

We continue to center our comments in this proceeding on an equitable transition to a clean, reliable, and efficient energy future for the residents of our city and addressing the disproportionate impacts that pollution and climate change have on low-income communities and communities of color. There is significant overlap between the IDP and equity concerns, and the City of Minneapolis strongly recommends incorporating equity into the IDP process.

Our analysis indicates that focusing on equity and the Commission's principles and planning objectives in this process will promote the public good.

Thank you for your consideration of our comments.

Sincerely,



Kim W. Havey, LEED AP, AICP
Director, Division of Sustainability

STATE OF MINNESOTA
BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

Katie Sieben	Chair
Valerie Means	Commissioner
Matthew Schuerger	Commissioner
Joseph Sullivan	Commissioner
John Tuma	Commissioner

IN THE MATTER OF XCEL ENERGY'S 2021
INTEGRATED DISTRIBUTION SYSTEM
PLAN AND REQUEST FOR CERTIFICATION
OF DISTRIBUTED INTELLIGENCE AND
THE RESILIENT MINNEAPOLIS PROJECT

DOCKET NO. E002/M-21-694

I. INTRODUCTION

Pursuant to the Notice of Extended Reply Comment Period issued on March 14, 2022, the City of Minneapolis submits to the Minnesota Public Utilities Commission (PUC) these Reply Comments in response to the Comments filed by parties and the utility in this proceeding. We appreciate the opportunity to provide these Reply Comments, which we generally organize around the following themes, consistent with the recommendations laid out in our initial Comments:

- Center Equity in the Distribution Planning Process
- Improve the Non-Wires Alternatives Analysis
- Approve Distributed Intelligence Application, with Stipulations Regarding the Distribution of Savings and Costs
- Approve Certification of the Resilient Minneapolis Projects

Approve Xcel Energy's IDP with modifications

We continue to support approval of this Integrated Distribution Plan, consistent with the modifications suggested in our initial comments. However, we also considered the Guidance Document developed by Synapse Energy Economics, Inc and submitted by the Department of Commerce with their comments.¹ We agree with Xcel Energy's position in Reply Comments that this guidance document, and the suggested requirements and criteria for the Integrated Distribution Planning (IDP) process, should not be applied to this plan retroactively. However, now that we have several iterations of utility IDPs to consider and the years of experience to review, we do believe there is an opportunity on a forward-looking basis to review the intent of the IDP in Minnesota and make modifications to the process based on efficacy of achieving the original goals and changing circumstances - in particular around issues like hosting capacity analysis (HCA), non-wires alternatives (NWA), and climate and equity considerations. We therefore recommend the Commission approve Xcel Energy's 2022-2031 IDP, with modifications, and consider recommendations from the Department of Commerce and other parties to inform future IDPs. We request additional stakeholder engagement to consider how to update our IDP filing requirements in

¹ Docket No. E002/M-21-694: Comments of the Minnesota Department of Commerce Division of Energy Resources

Minnesota.

We support the recommendations of a number of other parties for improving the IDP process. We agree with the following suggestions from the Community Power, Environmental Law & Policy Center, and Vote Solar (CEV) comments, that the Commission should:²

- take steps to further improve the alignment of resource planning, distribution planning, and transmission planning;
- strengthen filing requirements related to DER integration and deployment;
- ensure that DER modeling, forecasting, and program planning functions are treated consistently in Xcel's Integrated Distribution and Resource Plans; and
- publish a fully updated and compiled set of filing requirements in a single document.

We support the following recommendations from Fresh Energy for Xcel's next-filed IDP, that the Commission should direct Xcel to:³

- prioritize the use of "net load" in its system-wide, substation, and feeder-level load forecasts;
- integrate or modify its systems and processes as needed to successfully incorporate the load-modifying impacts of demand-side management (DSM) in system-wide, substation, and feeder-level load forecasts; and
- incorporate building, transportation, and industrial electrification scenarios into system-wide, substation, and feeder-level load forecasts.

Both Fresh Energy and the City of Northfield raise the issue of hosting capacity constraints and proposed interconnection upgrade fees from Xcel Energy for adding more solar and other DER that are posing a barrier for communities who are planning more in-boundary renewable energy generation. Fresh Energy requested additional information to better understand the coordination between interconnect-driven and other routine distribution system upgrades, to ensure that there are no unnecessary costs being incurred by customers for such upgrades. Both Northfield and the coalition of Minnesota cities emphasized the importance of considering the climate, energy, and equity goals that many local governments within Xcel Energy's Minnesota service territory have set as a part of the IDP process. It is important not only to consider these goals as a part of DER forecasts, but also to look at how these climate and clean energy plans from local governments may inform IDP decisions and investments. It will be particularly important for Xcel to anticipate more beneficial electrification in its load forecast, especially as driven by local government goals and policies.

II. Center Equity in the Integrated Distribution Plan

As we raised in our initial comments, we believe it is important to take a human-centered approach to grid planning, to take into consideration the patterns of investment in certain communities, and the other circumstances at play that - while perhaps not the direct responsibility of the utility - are relevant to understand how distribution investments and decisions may impact customers differently, and what opportunities exist to repair past harms to marginalized communities, while creating a more affordable, resilient, and reliable grid. We also shared examples from a number of other states that are in the process of designing IDP rules with equity and climate at the center, which may offer good examples for Minnesota to adopt within the current PUC framework.

² Docket No. E002/M-21-694: Initial Comments of Community Power, Environmental Law & Policy Center, and Vote Solar - February 25, 2022

³ Docket No. E002/M-21-694: Initial Comments of Fresh Energy - February 25, 2022

The CEV comments offer a summary of relevant scholarship and resources on the topic of grid equity, as well as examples from other Minnesota dockets that further support the Commission's authority and duty to ensure grid equity in distribution system planning. We support CEV's principles for incorporating grid equity into distribution planning, as well as their recommendation that the Commission amend its IDP planning objectives and filing requirements to explicitly incorporate equity.

We are appreciative of Xcel Energy's commitment to "fully support incorporating equity broadly into energy planning and decision-making,"⁴ but have some concerns about the separate equity docket that they anticipate in their comments. The City has not seen anything in the record to indicate that the Commission will open a new docket, but we have some concern about the potential to move all the equity issues and considerations out of their respective proceedings and into a single, separate docket. This may, for lack of a better term, ghettoize the issue of equity by not integrating into the planning and decision-making of all relevant dockets. We instead suggest that the Commission continue to engage stakeholders on this topic - in particular those communities that are most directly impacted, as suggested in the CEV comments' principles for incorporating grid equity into distribution planning - to ensure that the appropriate equity stipulations are applied in the next IDP and other relevant dockets.

III. Modify Non-Wires Alternative Analysis

Whether or not Xcel Energy pursues a Non-Wires Alternative (NWA) project depends on cost effectiveness for resolving grid constraints, and the cost effectiveness finding is highly dependent on the approach Xcel Energy uses in its evaluation. Since to date, the methodology Xcel Energy employs has not yet produced projects, the methodology merits scrutiny about what technologies to include and in what combination, and how to value these aspects of an NWA in relation to traditional grid solutions.

Minneapolis is generally supportive of Xcel Energy's proposal to move to a stacked value analysis approach, especially if it more accurately reflects the benefits and costs of NWA. Xcel Energy's proposed new method is two phase: 1) "an initial cost and feasibility screening, and projects that have reasonable cost-benefit results progress to the second step" of 2) "conduct a detailed study."⁵ Therefore, the methods used in the initial cost and feasibility screening are critical to the perceived viability of NWA. Minneapolis submits the following analysis of Xcel Energy's proposed methodology.

Consider value streams that do not easily fit into quantitative cost screening

In Xcel Energy's reply comments, they state that "basing a certification decision on a singular economic criterion, such as a cost-benefit result, to the exclusion of other important, but qualitative benefits that these projects will provide, would be inconsistent with the public interest and the Commission's approach to-date."⁶ Minneapolis agrees and supports Xcel Energy's argument that not all value streams fit into "singular economic criterion."

Xcel Energy employs this reasoning to justify, in part, their Distributed Intelligence application due to the value of lessons learned and new technological pathways that it would enable. As discussed later, Minneapolis supports the Distributed Intelligence application and finds Xcel Energy's qualitative reasoning satisfactory in this instance.

⁴ Docket No. E002/M-21-694: Xcel Energy 2021 IDP Reply Comments, Page 11

⁵ Docket No. E002/M-21-694: Xcel Energy 2021 IDP. Appendix F, Page 14

⁶ Docket No. E002/M-21-694: Xcel Energy 2021 IDP Reply Comments, Page 16

Xcel Energy later states that, "the initial NWA screening process is a coarse filter that serves to exclude projects that are either infeasible from an engineering perspective or that have costs vastly outweighing the benefits. Projects that are close in terms of costs and benefits will not be excluded by the initial screening."⁷ Minneapolis agrees that infeasible projects from an engineering perspective are reasonable to exclude. However, given that 'singular economic criterion' like cost-benefit analysis may not properly represent hard to quantify value streams, such as those relating to social equity, Xcel Energy should not screen out projects that are close to negative cost effectiveness, and should instead include them for additional analysis of their non-quantitative value to Xcel's system and customers.

Xcel Energy must consider the full range of DERs in their NWA analysis, including energy efficiency and distribution system benefits.

Xcel Energy states they did not include incremental energy efficiency (EE) in their previous NWA analysis because "risks can generally be solved in a more cost-effective and timely manner with other DER types such as BESS, solar, and demand response/load flexibility."⁸ While Minneapolis supports Xcel Energy's interest in other types of DERs, energy efficiency is widely known to be the cheapest available source of energy, has been used successfully in existing NWA projects to meet grid needs, and provides valuable yet hard to quantify benefits to recipients, including health, resilience and reduction in energy burden.

Xcel Energy also states, "Our proposed methodology includes an assumption that there would be an open solicitation process that is technology agnostic. Therefore, any bid that can solve the projects risks cost-effectively can be a viable alternative and will be considered, regardless of DER type(s)."⁹ Yet, in *Table 5: Proposed Methodology Cost Summary for Installing Viking VKG Feeder*,¹⁰ illustrating the proposed new approach, EE is excluded as a component of NWA.

Xcel Energy also notes that if a project passes initial cost screening, Xcel Energy may then consider other stacked benefits, including Avoided Distribution System Losses, O&M and System Voltage. Minneapolis asserts it is reasonable to include these distribution benefits in the initial analysis for NWA, especially given that the current approach has not yet produced any NWA projects.

Minneapolis requests the PUC require Xcel Energy to:

- ensure that EE is intentionally included in NWA analysis in the future.
- include Avoided Distribution System Losses, O&M, and System Voltage as benefits in the initial NWA screen test.

Compare and contrast NWA analysis under different discount rates

Minneapolis agrees with Xcel Energy's reply comments that the discount rate is dependent on the value stream being assessed. We appreciate that Xcel Energy suggests "there may be merit in further exploring the use of other discount rates in the specific context of NWA analysis in our next NWA analysis."¹¹

Xcel Energy also states "the record in this IDP is not fully developed and ripe for a determination" for a

⁷ Docket No. E002/M-21-694: Xcel Energy 2021 IDP Reply Comments. Attachment A. Page 31

⁸ Docket No. E002/M-21-694: Xcel Energy 2021 IDP Reply Comments. Attachment A. Page 31

⁹ Docket No. E002/M-21-694: Xcel Energy 2021 IDP Reply Comments. Attachment A. Page 31

¹⁰ Docket No. E002/M-21-694: Xcel Energy 2021 IDP. Appendix F. Page 20

¹¹ Docket No. E002/M-21-694: Xcel Energy 2021 IDP Reply Comments. Attachment A. Page 33

prescriptive discount rate for NWA analysis. Minneapolis agrees and believes that this also indicates that there is not sufficient standing to claim that weighted average cost of capital (WACC) is the appropriate discount rate for NWA projects and presenting NWA analysis results that do not consider alternative discount rates underestimates the value of NWA.

The value streams assessed in NWA analyses are generally customer-sited projects like on-site solar, storage, and efficiency. Many industry experts argue that these solutions and demand side management programs should use a societal discount rate as opposed to a discount rate that reflects the capital market because customers are the source of capital and because of their nature as small projects with little financial risk.^{12, 13, 14} Currently, 12 states including Minnesota use a low-risk discount rate to evaluate cost effectiveness of DERs.¹⁵

The NWA analysis assumptions and values described in Tables 7 and 8 of IDP Filing Appendix F, as well as the described equations in Figures 8-17 show how integral the selection of discount rate is to the calculated value of NWA.¹⁶

The Commission may wish to clarify the appropriate discount rate, which can vary depending on funding source, and Xcel should put forward NWA analyses that include alternative discount rates.

Therefore, Minneapolis requests:

- NWA analysis compares results under different discount rates in future IDPs, using the societal and utility discount rates approved in February 11, 2020 Order in Docket No. E999/CIP-18-783.
- The Commission clarify the appropriate discount rate(s) to use within future IDPs.

Develop an evidence-based dollar value threshold for NWA analysis

In initial comments and within the previous IDP, Minneapolis suggests that Xcel Energy evaluate NWA projects at thresholds less than \$2 million. Given that Xcel Energy has proposed an entirely new NWA analysis approach and may implement other methodological changes like comparing various discount rates, it is reasonable that the proposed approach may have different results for projects above and below the \$2 million threshold.

In reply comments, Xcel Energy stands by the \$2 million threshold, but did not provide evidence supporting that the threshold of \$2 million is appropriate. In fact, in the previous IDP, Xcel outlined that the \$2 million minimum threshold risks screening out less expensive, lower risk projects that may be more suitable for NWA:

Most capacity projects budgeted at greater than \$2 million are intended to solve larger numbers of risks – this vastly increases the complexity of the problems to solve with an NWA, and in turn

¹² National Standard Practice Manual for Benefit-Cost Analysis of Distributed Energy Resources, August 2020: https://www.nationalenergyscreeningproject.org/wp-content/uploads/2020/08/NSPM-DERs_08-24-2020.pdf

¹³ Recognizing the Full Value of Energy Efficiency, Regulatory Assistance Project: <https://www.raponline.org/wp-content/uploads/2016/05/rap-lazarcolburn-layercakepaper-2013-sept-09.pdf>

¹⁴ Does Integrated Resource Planning Effectively Integrate Demand-Side Resources? Resources for the Future: <https://media.rff.org/documents/RFF-Rpt-Burtraw-Duncan-2.pdf>

¹⁵ National Standard Practice Manual Database of Screening Practices (DSP): <https://www.nationalenergyscreeningproject.org/state-database-dsp/database-of-state-efficiency-screening-practices>

¹⁶ Docket No. E002/M-21-694: Xcel Energy 2021 IDP. Appendix F. Pages 21 - 25

*increases the amount of resources required to conduct the analysis. Projects with fewer capacity risks to solve are more localized and therefore more straightforward. We also look for any opportunities to utilize resources to solve more than one risk, such as optimally placing them at key locations on the system.*¹⁷

We reiterate precedence from across the country and within Minnesota that demonstrates how other thresholds have been used and may be appropriate for Minnesota.

- Maine requires their utilities to analyze NWA for any project that exceeds \$500k and for projects under \$500k if there is reasonable likelihood that NWA would be more cost effective than the traditional solution.¹⁸
- New York, Rhode Island, and Vermont use a differentiated threshold for different project types.¹⁹
- The Center for Energy and Environment NWA pilot addressed a \$4.1 million dollar project and utilized the one-year deferral value of \$177,632 as the project budget.²⁰

Therefore, Minneapolis requests that the Commission set an evidence-based threshold for NWA analysis.

Approve Fresh Energy's Recommendations Regarding DER Forecasts and Advanced Inverter Functionality

In addition to the methodological process of NWA analysis, other key elements of the IDP are critical to the successful deployment of NWA. Fresh Energy provided rigorous analysis and robust recommendations regarding Xcel Energy's DER forecasting, integration of DER forecasts into the planning process, and accelerating the adoption of advanced inverter functionality.

Minneapolis reviewed these suggestions and recommends that the Commission adopt Fresh Energy's recommendations found in section II of Fresh Energy's initial comments.²¹

IV. Approve Distributed Intelligence Application, with Stipulations Regarding the Distribution of Savings and Costs

Minneapolis appreciates the need for grid modernization, including the functionality proposed under the distributed intelligence (DI) proposal.

Minneapolis agrees with Xcel that the DI proposal should result in a 'quantified predicted customer energy savings benefit.' As the electricity provider actively managing the grid, Xcel Energy will be able to reduce the cost of energy production through new revenue streams available to utilities. We recommend that if the Commission approves certification of the DI investment that the Commission require Xcel Energy to track the associated savings and pass them on to customers who paid for them or to establish an account designated for a program to invest the savings in community-driven resilience projects.

¹⁷ Docket No. E002/M-21-694: Xcel 2019 IDP. p. 97-98.

¹⁸ Pacific Energy Institute NWA Opportunity Evaluation Survey of Current Practice from March 2020: <https://pacificenergyinstitute.org/wp-content/uploads/2020/04/NWA-Opportunity-Evaluation-Survey-final-Mar-2020.pdf>

¹⁹ The Non-Wires Solutions Implementation Playbook: A Practical Guide for Regulators, Utilities, and Developers from Rocky Mountain Institute: <https://rmi.org/insight/non-wires-solutions-playbook/>

²⁰ NON-WIRES ALTERNATIVES AS A PATH TO LOCAL CLEAN ENERGY: RESULTS OF A MINNESOTA PILOT <https://www.mncee.org/sites/default/files/report-files/Non-Wires%20Alternatives%20as%20a%20Path%20to%20Local%20Clean%20Energy.pdf>

²¹ Docket No. E002/M-21-694: Initial Comments of Fresh Energy - February 25, 2022

This is supported from our previous Xcel IDP comments highlighting the importance of coordinating various improvements to fully achieve the benefits:

Minneapolis understands that as advanced metering infrastructure is deployed, the actual performance does not always match the desired grid flexibility and customer benefits promoted by vendors. A utility can protect itself and its customers by carefully negotiating the terms of contracts with vendors such that full payment is withheld until the advertised performance milestones are reached. This requires extensive coordination and negotiation upfront with the numerous vendors and takes time. But if done well, it means that the various equipment manufacturers and software developers are committed not just to working with the utility, but also to working with each other. The burden is on the vendors as well as the utility to demonstrate the functionality promised, which leads to lower risk and better outcomes. The interoperability is what makes an advanced meter [smart].²²

Minneapolis recommends that the risk of unrealized savings associated with the requested DI investment be borne by the Company and not by customers: If the savings are not realized, the Company should credit customers proportionally for the difference between expected savings and actual savings.

V. Approve Resilient Minneapolis Projects

Minneapolis actively engaged in the previous Xcel IDP docket, 19-666, and advocated extensively for structuring the NWA methodology to enable promising projects to move forward and lessons to be learned.²³ During the Commission Hearing,²⁴ the lack of NWA projects passing Xcel's screening in the current and previous IDPs was discussed. While the Commission did not include an order point requiring Xcel to modify its methodology, the Commission asked Xcel during the hearing if there was a willingness to collaborate with the City of Minneapolis on possible solutions prior to the next IDP, due November 1, 2021. Xcel agreed to do so and invited the city to meet to discuss possible pilot options that would allow for additional learning outside an NWA evaluation path. The Resilient Minneapolis Projects were a result of these productive discussions with Xcel and the lessons learned will benefit all customers.

We appreciate Xcel's acknowledgement of our suggestion for improving the RMP process in our initial comments, including the expanded consideration of community resilience, support for the community partners to determine their own needs, leveraging of additional resources to support other investments at the RMP sites, and maximizing the opportunity for women and minority-owned small businesses to build and maintain these systems. A paper from the National Association of Regulatory Utility Commissioners (NARUC) and the National Association of State Energy Officials offers some new approaches to valuing resilience and proposed actions to facilitate resilient microgrid investments and may be useful for better understanding and quantifying the resilience values.²⁵ We intend to continue to work with Xcel and the RMP host sites to ensure these projects are successful and serve as a model for other communities.

²² Docket 19-666. Xcel 2019 Integrated Distribution Plan. Minneapolis Supplemental Comments. p.3-4.

²³ Minneapolis Comments. Docket No. E002/M-19-666 Xcel Energy 2020-2029 Integrated Distribution Plan. Mar. 17, 2020; Minneapolis Reply Comments. Apr. 22, 2020.

²⁴ Commission Hearing. Docket No. E002/M-19-666 Xcel Energy 2020-2029 Integrated Distribution Plan. May 29, 2020.

²⁵ Valuing Resilience for Microgrids: Challenges, Innovative Approaches, and State Needs:

[https://www.naseo.org/data/sites/1/documents/publications/NARUC Resilience for Microgrids INTERACTIVE 021 122.pdf](https://www.naseo.org/data/sites/1/documents/publications/NARUC%20Resilience%20for%20Microgrids%20INTERACTIVE%201122.pdf)

VI. Summary of Recommendations

Minneapolis appreciates the Commission's review of these comments and the effort put forward by Xcel Energy and other commenters to continuously improve this important process. In summary, Minneapolis recommends that the Commission approve Xcel Energy's 2021 IDP with the following stipulations:

1. Center Equity in the Distribution Planning Process
 - Enact CEV's principles for incorporating grid equity into distribution planning, as well as their recommendation that the Commission amend its IDP planning objectives and filing requirements to explicitly incorporate equity.
 - Continue to engage stakeholders on this topic - in particular those communities that are most directly impacted, as suggested in the CEV comments' principles for incorporating grid equity into distribution planning - to ensure that the appropriate equity stipulations are applied in the next IDP and other relevant dockets.
2. Modify the Non-Wires Alternatives Analysis - Require Xcel to:
 - Incorporate benefits from value streams that do not easily fit into quantitative cost screening but
 - Include energy efficiency in all NWA analysis in the future
 - Include Avoided Distribution System Losses, O&M and System Voltage as benefits in the initial NWA screen test
 - Compare NWA analysis results under different assumed discount rates. Minneapolis suggests using the societal and utility discount rates approved in February 11, 2020 Order in Docket No. E999/CIP-18-783
 - Clarify how NWAs will be funded so that stakeholders have clarification on source of capital and the appropriate discount rate
 - Approve Fresh Energy's recommendations regarding DER forecasting and advanced inverter functionality.

We also request that the PUC establish an evidence-based threshold for viable NWA analysis within the IDP.

3. Approve Distributed Intelligence Application, with Stipulations Regarding the Distribution of Savings and Costs
 - Require Xcel Energy to track the associated savings and pass them on to customers who paid for them or establish an account designated for a program to invest the savings in community-driven resilience projects territory-wide.
 - Require that any unrealized savings associated with the DI investment be borne by the Company and not by customers: If the savings are not realized, the Company should credit customers proportionally for the difference between expected and actual savings.
4. Approve Certification of the Resilient Minneapolis Projects

STATE OF MINNESOTA)

) ss.

CERTIFICATE OF SERVICE

COUNTY OF HENNEPIN)

I, Stacy A. Miller, of the City of Minneapolis, County of Hennepin, State of Minnesota, affirm that on the 11th day of April 2022, I served a copy of the following via e-mail and/or via U.S. Mail:

REPLY COMMENTS OF THE CITY OF MINNEAPOLIS regarding Docket No. 21-694

at the last known mailing addresses and email addresses of said entities/individuals on the attached Service List. If by U.S. Mail, I placed said document in postage prepaid envelope and placed same in the U.S. Post Office in Minneapolis, Minnesota for delivery by the United States Postal Service.



Stacy A. Miller

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret
Michael	Allen	michael.allen@allenergysolar.com	All Energy Solar	721 W 26th st Suite 211 Minneapolis, Minnesota 55405	Electronic Service	No
David	Amster Olzweski	david@mysunshare.com	SunShare, LLC	1151 Bannock St Denver, CO 80204-8020	Electronic Service	No
Ellen	Anderson	ellena@umn.edu	325 Learning and Environmental Sciences	1954 Buford Ave Saint Paul, MN 55108	Electronic Service	No
Alison C	Archer	aarcher@misoenergy.org	MISO	2985 Ames Crossing Rd Eagan, MN 55121	Electronic Service	No
Mara	Ascheman	mara.k.ascheman@xcelenergy.com	Xcel Energy	414 Nicollet Mall FI 5 Minneapolis, MN 55401	Electronic Service	No
Donna	Attanasio	dattanasio@law.gwu.edu	George Washington University	2000 H Street NW Washington, DC 20052	Electronic Service	No
John	Bailey	bailey@ilsr.org	Institute For Local Self-Reliance	1313 5th St SE Ste 303 Minneapolis, MN 55414	Electronic Service	No
Mark	Bakk	mbakk@lcp.coop	Lake Country Power	26039 Bear Ridge Drive Cohasset, MN 55721	Electronic Service	No
Gail	Baranko	gail.baranko@xcelenergy.com	Xcel Energy	414 Nicollet Mall 7th Floor Minneapolis, MN 55401	Electronic Service	No
Jessica L	Bayles	Jessica.Bayles@stoel.com	Stoel Rives LLP	1150 18th St NW Ste 325 Washington, DC 20036	Electronic Service	No
Mathias	Bell	mathias@weavegrid.com	Weave Grid, Inc.	222 7th Street, 2nd floor San Francisco, California 94103	Electronic Service	No
James J.	Bertrand	james.bertrand@stinson.com	STINSON LLP	50 S 6th St Ste 2600 Minneapolis, MN 55402	Electronic Service	No
Derek	Bertsch	derek.bertsch@mrenergy.com	Missouri River Energy Services	3724 West Avera Drive PO Box 88920 Sioux Falls, SD 57109-8920	Electronic Service	No
William	Black	bblack@mmua.org	MMUA	Suite 200 3131 Fernbrook Lane North Plymouth, MN 55447	Electronic Service	No
Zoe	Bourgerie	zoe.bourgerie@minneapolismn.gov	Minneapolis City of Lakes	350 S 5th St Rm 307 Minneapolis, MN 55415	Electronic Service	No

Kenneth	Bradley	kbradley1965@gmail.com		2837 Emerson Ave S Apt CW112 Minneapolis, MN 55408	Electronic Service	No
Elizabeth	Brama	ebrama@taftlaw.com	Taft Stettinius & Hollister LLP	2200 IDS Center 80 South 8th Street Minneapolis, MN 55402	Electronic Service	No
Jon	Brekke	jbrekke@greenergy.com	Great River Energy	12300 Elm Creek Boulevard Maple Grove, MN 553694718	Electronic Service	No
Sydney R.	Briggs	sbriggs@swce.coop	Steele-Waseca Cooperative Electric	2411 W. Bridge St PO Box 485 Owatonna, MN 55060-0485	Electronic Service	No
Mark B.	Bring	mbring@otpc.com	Otter Tail Power Company	215 South Cascade Street PO Box 496 Fergus Falls, MN 565380496	Electronic Service	No
Janet	Brown	jab5100@gmail.com	Sabathani Community Center (Sabathani/SCC)	310 E 38th St Ste 200 Minneapolis, MN 55409	Electronic Service	No
Christina	Brusven	cbrusven@fredlaw.com	Fredrikson Byron	200 S 6th St Ste 4000 Minneapolis, MN 554021425	Electronic Service	No
Jason	Burwen	jburwen@cleanpower.org	Energy Storage Association	1155 15th St NW, Ste 500 Washington, DC 20005	Electronic Service	No
LORI	CLOBES	lclobes@mienergy.coop	MiEnergy Cooperative	31110 COOPERATIVE WAY PO BOX 626 RUSHFORD, MN 55971	Electronic Service	No
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
Douglas M.	Carnival	dmc@mcgrannshea.com	McGrann Shea Carnival Straughn & Lamb	N/A	Electronic Service	No
Ray	Choquette	rchoquette@agp.com	Ag Processing Inc.	12700 West Dodge Road PO Box 2047 Omaha, NE 68103-2047	Electronic Service	No
John	Coffman	john@johncoffman.net	AARP	871 Tuxedo Blvd. St. Louis, MO 63119-2044	Electronic Service	No
Kenneth A.	Colburn	kcolburn@symbioticstrategies.com	Symbiotic Strategies, LLC	26 Winton Road Meredith, NH 32535413	Electronic Service	No
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

Riley	Conlin	riley.conlin@stoel.com	Stoel Rives LLP	33 S. 6th Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No
Brooke	Cooper	bcooper@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022191	Electronic Service	No
George	Crocker	gwillc@nawo.org	North American Water Office	PO Box 174 Lake Elmo, MN 55042	Electronic Service	No
David	Dahlberg	davedahlberg@nweco.com	Northwestern Wisconsin Electric Company	P.O. Box 9 104 South Pine Street Grantsburg, WI 548400009	Electronic Service	No
James	Denniston	james.r.denniston@xcelenergy.com	Xcel Energy Services, Inc.	414 Nicollet Mall, 401-8 Minneapolis, MN 55401	Electronic Service	No
Curt	Dieren	curt.dieren@dgr.com	L&O Power Cooperative	1302 S Union St Rock Rapids, IA 51246	Electronic Service	No
Carlton	Doyle Fontaine	carlon.doyle.fontaine@senate.mn	MN Senate	75 Rev Dr Martin Luther King Jr Blvd Room G-17 St Paul, MN 55155	Electronic Service	No
Brian	Draxten	bhdraxten@otpc.com	Otter Tail Power Company	P.O. Box 496 215 South Cascade Street Fergus Falls, MN 565380498	Electronic Service	No
Kristen	Eide Tollefson	healingsystems69@gmail.com	R-CURE	28477 N Lake Ave Frontenac, MN 55026-1044	Electronic Service	No
Rebecca	Eilers	rebecca.d.eilers@xcelenergy.com	Xcel Energy	414 Nicollet Mall - 401 7th Floor Minneapolis, MN 55401	Electronic Service	No
Bob	Eleff	bob.eleff@house.mn	Regulated Industries Cmte	100 Rev Dr Martin Luther King Jr Blvd Room 600 St. Paul, MN 55155	Electronic Service	No
Betsy	Engelking	betsy@nationalgridrenewables.com	Geronimo Energy, LLC	8400 Normandale Lake Blvd Ste 1200 Bloomington, MN 55437	Electronic Service	No
Oncu	Er	oncu.er@avantenergy.com	Avant Energy, Agent for MMPA	220 S. Sixth St. Ste. 1300 Minneapolis, MN 55402	Electronic Service	No
James C.	Erickson	jericksonkbc@gmail.com	Kelly Bay Consulting	17 Quechee St Superior, WI 54880-4421	Electronic Service	No
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
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 280	Electronic Service	No

				Saint Paul, MN 551012198		
Nathan	Franzen	nathan@nationalgridrenewables.com	Geronimo Energy, LLC	8400 Normandale Lake Blvd Ste 1200 Bloomington, MN 55437	Electronic Service	No
Hal	Galvin	halgalvin@comcast.net	Provectus Energy Development llc	1936 Kenwood Parkway Minneapolis, MN 55405	Electronic Service	No
Edward	Garvey	edward.garvey@AESLconsulting.com	AESL Consulting	32 Lawton St Saint Paul, MN 55102-2617	Electronic Service	No
Edward	Garvey	garveyed@aol.com	Residence	32 Lawton St Saint Paul, MN 55102	Electronic Service	No
Bruce	Gerhardson	bgerhardson@otpc.com	Otter Tail Power Company	PO Box 496 215 S Cascade St Fergus Falls, MN 565380496	Electronic Service	No
Allen	Gleckner	gleckner@fresh-energy.org	Fresh Energy	408 St. Peter Street Ste 350 Saint Paul, Minnesota 55102	Electronic Service	No
Jenny	Glumack	jenny@mrea.org	Minnesota Rural Electric Association	11640 73rd Ave N Maple Grove, MN 55369	Electronic Service	No
Timothy	Gulden	timothy.gulden@yahoo.com	Winona Renewable Energy, LLC	1449 Ridgewood Dr Winona, MN 55987	Electronic Service	No
Tony	Hainault	anthony.hainault@co.hennepin.mn.us	Hennepin County DES	701 4th Ave S Ste 700 Minneapolis, MN 55415-1842	Electronic Service	No
Kim	Havey	kim.havey@minneapolismn.gov	City of Minneapolis	350 South 5th Street, Suite 315M Minneapolis, MN 55415	Electronic Service	No
Todd	Headlee	theadlee@dvigridsolutions.com	Dominion Voltage, Inc.	701 E. Cary Street Richmond, VA 23219	Electronic Service	No
Amber	Hedlund	amber.r.hedlund@xcelenergy.com	Northern States Power Company dba Xcel Energy-Elec	414 Nicollet Mall, 401-7 Minneapolis, MN 55401	Electronic Service	No
Adam	Heinen	aheinen@dakotaelectric.com	Dakota Electric Association	4300 220th St W Farmington, MN 55024	Electronic Service	No
Jared	Hendricks	jared.hendricks@owatonnautilities.com	Owatonna Municipal Public Utilities	PO Box 800 208 S Walnut Ave Owatonna, MN 55060-2940	Electronic Service	No
Annete	Henkel	mui@mnutilityinvestors.org	Minnesota Utility Investors	413 Wacouta Street #230 St.Paul, MN 55101	Electronic Service	No

Sandra	Henry	Sandra.Henry@elevatenp.org	Elevate	322 S Green St Ste 300 Chicago, IL 60607	Electronic Service	No
Lynn	Hinkle	lynnh@ips-solar.com	IPS Solar	2670 Patton Rd Roseville, MN 55113	Electronic Service	No
Joe	Hoffman	ja.hoffman@smmpa.org	SMMPA	500 First Ave SW Rochester, MN 55902-3303	Electronic Service	No
Michael	Hoppe	lu23@ibew23.org	Local Union 23, I.B.E.W.	445 Etna Street Ste. 61 St. Paul, MN 55106	Electronic Service	No
Jan	Hubbard	jan.hubbard@comcast.net		7730 Mississippi Lane Brooklyn Park, MN 55444	Electronic Service	No
Geoffrey	Inge	ginge@regintl.com	Regulatory Intelligence LLC	PO Box 270636 Superior, CO 80027-9998	Electronic Service	No
Casey	Jacobson	cjacobson@bepc.com	Basin Electric Power Cooperative	1717 East Interstate Avenue Bismarck, ND 58501	Electronic Service	No
Ralph	Jacobson	ralphj@ips-solar.com		2126 Roblyn Avenue Saint Paul, Minnesota 55104	Electronic Service	No
John S.	Jaffray	jjaffray@jjrpower.com	JJR Power	350 Highway 7 Suite 236 Excelsior, MN 55331	Electronic Service	No
Alan	Jenkins	aj@jenkinsatlaw.com	Jenkins at Law	2950 Yellowtail Ave. Marathon, FL 33050	Electronic Service	No
Andrea	Jenkins	Andrea.Jenkins@minneapolismn.gov	Minneapolis City of Lakes	350 S 5th St Room 307 Minneapolis, MN 55415	Electronic Service	No
Richard	Johnson	Rick.Johnson@lawmoss.com	Moss & Barnett	150 S. 5th Street Suite 1200 Minneapolis, MN 55402	Electronic Service	No
Sarah	Johnson Phillips	sarah.phillips@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No
Nate	Jones	njones@hcpd.com	Heartland Consumers Power	PO Box 248 Madison, SD 57042	Electronic Service	No
Michael	Kampmeyer	mkampmeyer@a-e-group.com	AEG Group, LLC	260 Salem Church Road Sunfish Lake, Minnesota 55118	Electronic Service	No
Nick	Kaneski	nick.kaneski@enbridge.com	Enbridge Energy Company, Inc.	11 East Superior St Ste 125 Duluth, MN 55802	Electronic Service	No
William D	Kenworthy	will@votesolar.org	Vote Solar	332 S Michigan Ave FL 9 Chicago, IL 60604	Electronic Service	No

Samuel B.	Ketchum	sketchum@kennedy-graven.com	Kennedy & Graven, Chartered	150 S 5th St Ste 700 Minneapolis, MN 55402	Electronic Service	No
Brad	Klein	bklein@elpc.org	Environmental Law & Policy Center	35 E. Wacker Drive, Suite 1600 Suite 1600 Chicago, IL 60601	Electronic Service	No
Thomas	Koehler	TGK@IBEW160.org	Local Union #160, IBEW	2909 Anthony Ln St Anthony Village, MN 55418-3238	Electronic Service	No
Chris	Kopel	chrisk@CMPASgroup.org	Central Minnesota Municipal Power Agency	459 S Grove St Blue Earth, MN 56013-2629	Electronic Service	No
Brian	Krambeer	bkrambeer@mienergy.coop	MiEnergy Cooperative	PO Box 626 31110 Cooperative Way Rushford, MN 55971	Electronic Service	No
Michael	Krause	michaelkrause61@yahoo.com	Kandiyo Consulting, LLC	433 S 7th Street Suite 2025 Minneapolis, Minnesota 55415	Electronic Service	No
Mary	LaGarde	mlagarde@maicnet.org	Minneapolis American Indian Center	1530 E Franklin Ave Minneapolis, MN 55404	Electronic Service	No
Matthew	Lacey	MLacey@grenergy.com	Great River Energy	12300 Elm Creek Boulevard Maple Grove, MN 553694718	Electronic Service	No
Carmel	Laney	carmel.laney@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No
James D.	Larson	james.larson@avantenergy.com	Avant Energy Services	220 S 6th St Ste 1300 Minneapolis, MN 55402	Electronic Service	No
Peder	Larson	plarson@larkinhoffman.com	Larkin Hoffman Daly & Lindgren, Ltd.	8300 Norman Center Drive Suite 1000 Bloomington, MN 55437	Electronic Service	No
Dean	Leischow	dean@sunrisenrg.com	Sunrise Energy Ventures	315 Manitoba Ave Ste 200 Wayzata, MN 55391	Electronic Service	No
Annie	Levenson Falk	annief@cupminnesota.org	Citizens Utility Board of Minnesota	332 Minnesota Street, Suite W1360 St. Paul, MN 55101	Electronic Service	No
Ryan	Long	ryan.j.long@xcelenergy.com	Xcel Energy	414 Nicollet Mall 401 8th Floor Minneapolis, MN 55401	Electronic Service	No
Susan	Ludwig	sludwig@mnpower.com	Minnesota Power	30 West Superior Street Duluth, MN 55802	Electronic Service	No

Alice	Madden	alice@communitypowermn.org	Community Power	2720 E 22nd St Minneapolis, MN 55406	Electronic Service	No
Kavita	Maini	kmairi@wi.rr.com	KM Energy Consulting, LLC	961 N Lost Woods Rd Oconomowoc, WI 53066	Electronic Service	No
Pam	Marshall	pam@energycents.org	Energy CENTS Coalition	823 7th St E St. Paul, MN 55106	Electronic Service	No
Mary	Martinka	mary.a.martinka@xcelenergy.com	Xcel Energy Inc	414 Nicollet Mall 7th Floor Minneapolis, MN 55401	Electronic Service	No
Samuel	Mason	smason@beltramielectric.com	Beltrami Electric Cooperative, Inc.	4111 Technology Dr. NW PO Box 488 Bemidji, MN 56619-0488	Electronic Service	No
Gregg	Mast	gmast@cleanenergyeconomymn.org	Clean Energy Economy Minnesota	4808 10th Avenue S Minneapolis, MN 55417	Electronic Service	No
Dave	McNary	David.McNary@hennepin.us	Hennepin County DES	701 Fourth Ave S Ste 700 Minneapolis, MN 55415-1842	Electronic Service	No
Thomas	Melone	Thomas.Melone@AllcoUS.com	Minnesota Go Solar LLC	222 South 9th Street Suite 1600 Minneapolis, Minnesota 55120	Electronic Service	No
Brian	Meloy	brian.meloy@stinson.com	STINSON LLP	50 S 6th St Ste 2600 Minneapolis, MN 55402	Electronic Service	No
David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022093	Electronic Service	No
Dalene	Monsebroten	dalene.monsebroten@nmpagency.com	Northern Municipal Power Agency	123 2nd St W Thief River Falls, MN 56701	Electronic Service	No
Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP	33 South Sixth St Ste 4200 Minneapolis, MN 55402	Electronic Service	No
Ben	Nelson	benn@cmpasgroup.org	CMPMA	459 South Grove Street Blue Earth, MN 56013	Electronic Service	No
Carl	Nelson	cnelson@mncee.org	Center for Energy and Environment	212 3rd Ave N Ste 560 Minneapolis, MN 55401	Electronic Service	No
Dale	Niezwaag	dniezwaag@bepc.com	Basin Electric Power Cooperative	1717 East Interstate Avenue Bismarck, ND 58503	Electronic Service	No
David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency	220 South Sixth Street Suite 1300 Minneapolis, Minnesota 55402	Electronic Service	No

Sephra	Ninow	sephra.ninow@energycenter.org	Center for Sustainable Energy	426 17th Street, Suite 700 Oakland, CA 94612	Electronic Service	No
Rolf	Nordstrom	rnordstrom@gpsid.net	Great Plains Institute	2801 21ST AVE S STE 220 Minneapolis, MN 55407-1229	Electronic Service	No
Samantha	Norris	samanthanorris@alliantenergy.com	Interstate Power and Light Company	200 1st Street SE PO Box 351 Cedar Rapids, IA 524060351	Electronic Service	No
David	O'Brien	david.obrien@navigant.com	Navigant Consulting	77 South Bedford St Ste 400 Burlington, MA 01803	Electronic Service	No
Jeff	O'Neill	jeff.oneill@ci.monticello.mn.us	City of Monticello	505 Walnut Street Suite 1 Monticello, Minnesota 55362	Electronic Service	No
Russell	Olson	rolson@hcpd.com	Heartland Consumers Power District	PO Box 248 Madison, SD 570420248	Electronic Service	No
Carol A.	Overland	overland@legalelectric.org	Legalelectric - Overland Law Office	1110 West Avenue Red Wing, MN 55066	Electronic Service	No
Dan	Patry	dpatry@sunedison.com	SunEdison	600 Clipper Drive Belmont, CA 94002	Electronic Service	No
Jeffrey C	Paulson	jeff.jcplaw@comcast.net	Paulson Law Office, Ltd.	4445 W 77th Street Suite 224 Edina, MN 55435	Electronic Service	No
Jennifer	Peterson	jjpeterson@mnpower.com	Minnesota Power	30 West Superior Street Duluth, MN 55802	Electronic Service	No
Hannah	Polikov	hpolikov@aee.net	Advanced Energy Economy Institute	1000 Vermont Ave, Third Floor Washington, DC 20005	Electronic Service	No
David G.	Prazak	dprazak@otpc.com	Otter Tail Power Company	P.O. Box 496 215 South Cascade Street Fergus Falls, MN 565380496	Electronic Service	No
Kenneth	Rance	krance@sabathani.org	Sabathani Community Center	310 East 38th St Rm #120 Minneapolis, MN 55409	Electronic Service	No
Mark	Rathbun	mrathbun@greenergy.com	Great River Energy	12300 Elm Creek Blvd Maple Grove, MN 55369	Electronic Service	No
Michael	Reinertson	michael.reinertson@avantenergy.com	Avant Energy	220 S. Sixth St. Ste 1300 Minneapolis, Minnesota 55402	Electronic Service	No
John C.	Reinhardt	N/A	Laura A. Reinhardt	3552 26th Ave S Minneapolis, MN 55406	Paper Service	No

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
Kevin	Reuther	kreuther@mncenter.org	MN Center for Environmental Advocacy	26 E Exchange St, Ste 206 St. Paul, MN 551011667	Electronic Service	No
Isabel	Ricker	ricker@fresh-energy.org	Fresh Energy	408 Saint Peter Street Suite 220 Saint Paul, MN 55102	Electronic Service	No
Amanda	Rome	amanda.rome@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 5 Minneapolis, MN 55401	Electronic Service	No
Robert K.	Sahr	bsahr@eastriver.coop	East River Electric Power Cooperative	P.O. Box 227 Madison, SD 57042	Electronic Service	No
Joseph L	Sathe	jsathe@kennedy-graven.com	Kennedy & Graven, Chartered	150 S 5th St Ste 700 Minneapolis, MN 55402	Electronic Service	No
Richard	Savelkoul	rsavelkoul@martinsquires.com	Martin & Squires, P.A.	332 Minnesota Street Ste W2750 St. Paul, MN 55101	Electronic Service	No
Thomas	Scharff	thomas.scharff@versoco.com	Verso Corp	600 High Street Wisconsin Rapids, WI 54495	Electronic Service	No
Kay	Schraeder	kschraeder@minnkota.com	Minnkota Power	5301 32nd Ave S Grand Forks, ND 58201	Electronic Service	No
Dean	Sedgwick	Sedgwick@itascapower.com	Itasca Power Company	PO Box 455 Spring Lake, MN 56680	Electronic Service	No
Maria	Seidler	maria.seidler@dom.com	Dominion Energy Technology	120 Tredegar Street Richmond, Virginia 23219	Electronic Service	No
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th PI E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes
Patricia F	Sharkey	psharkey@environmentallawcounsel.com	Midwest Cogeneration Association.	180 N LaSalle St Ste 3700 Chicago, IL 60601	Electronic Service	No
Bria	Shea	bria.e.shea@xcelenergy.com	Xcel Energy	414 Nicollet Mall Minneapolis, MN 55401	Electronic Service	No
Doug	Shoemaker	dougs@charter.net	Minnesota Renewable Energy	2928 5th Ave S Minneapolis, MN 55408	Electronic Service	No
Anne	Smart	anne.smart@chargepoint.com	ChargePoint, Inc.	254 E Hacienda Ave Campbell, CA 95008	Electronic Service	No
Ken	Smith	ken.smith@ever-greenenergy.com	Ever Green Energy	305 Saint Peter St Saint Paul, MN 55102	Electronic Service	No

Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.	76 W Kellogg Blvd St. Paul, MN 55102	Electronic Service	No
Trevor	Smith	trevor.smith@avantenergy.com	Avant Energy, Inc.	220 South Sixth Street Suite 1300 Minneapolis, Minnesota 55402	Electronic Service	No
Joshua	Smith	joshua.smith@sierraclub.org		85 Second St FL 2 San Francisco, California 94105	Electronic Service	No
Beth H.	Soholt	bsoholt@windonthewires.org	Wind on the Wires	570 Asbury Street Suite 201 St. Paul, MN 55104	Electronic Service	No
Sky	Stanfield	stanfield@smwlaw.com	Shute, Mihaly & Weinberger	396 Hayes Street San Francisco, CA 94102	Electronic Service	No
Tom	Stanton	tstanton@nrri.org	NRRI	1080 Carmack Road Columbus, OH 43210	Electronic Service	No
Jamez	Staples	jstaples@renewablenrgpartners.com	Renewable Energy Partners	3033 Excelsior Blvd S Minneapolis, MN 55416	Electronic Service	No
Byron E.	Starns	byron.starns@stinson.com	STINSON LLP	50 S 6th St Ste 2600 Minneapolis, MN 55402	Electronic Service	No
James M	Strommen	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered	150 S 5th St Ste 700 Minneapolis, MN 55402	Electronic Service	No
Eric	Swanson	eswanson@winthrop.com	Winthrop & Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No
Lynnette	Sweet	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	Yes
Peter	Teigland	pteigland@mnseia.org	Minnesota Solar Energy Industries Association	2288 University Ave W Saint Paul, MN 55114	Electronic Service	No
Stuart	Tommerdahl	stommerdahl@otpc.com	Otter Tail Power Company	215 S Cascade St PO Box 496 Fergus Falls, MN 56537	Electronic Service	No
Pat	Treseler	pat.jcplaw@comcast.net	Paulson Law Office LTD	4445 W 77th Street Suite 224 Edina, MN 55435	Electronic Service	No
Karen	Turnboom	karen.turnboom@versoco.com	Verso Corporation	100 Central Avenue Duluth, MN 55807	Paper Service	No
Thomas	Tynes	jjazynka@energyfreedomcoalition.com	Energy Freedom Coalition of America	101 Constitution Ave NW Ste 525 East	Electronic Service	No

				Washington, DC 20001		
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
Curt	Volkman	curt@newenergy-advisors.com	Fresh Energy	408 St Peter St Saint Paul, MN 55102	Electronic Service	No
Roger	Warehime	roger.warehime@owatonnautilities.com	Owatonna Municipal Public Utilities	208 S Walnut Ave PO BOX 800 Owatonna, MN 55060	Electronic Service	No
Jenna	Warmuth	jwarmuth@mnpower.com	Minnesota Power	30 W Superior St Duluth, MN 55802-2093	Electronic Service	No
Samantha	Williams	swilliams@nrdc.org	Natural Resources Defense Council	20 N. Wacker Drive Ste 1600 Chicago, IL 60606	Electronic Service	No
Joseph	Windler	jwindler@winthrop.com	Winthrop & Weinstine	225 South Sixth Street, Suite 3500 Minneapolis, MN 55402	Electronic Service	No
Robyn	Woeste	robynwoeste@alliantenergy.com	Interstate Power and Light Company	200 First St SE Cedar Rapids, IA 52401	Electronic Service	No
Yochi	Zakai	yzakai@smwlaw.com	SHUTE, MIHALY & WEINBERGER LLP	396 Hayes Street San Francisco, CA 94102	Electronic Service	No
Christopher	Zibart	czibart@atcllc.com	American Transmission Company LLC	W234 N2000 Ridgeview Pkwy Court Waukesha, WI 53188-1022	Electronic Service	No
Patrick	Zomer	Pat.Zomer@lawmoss.com	Moss & Barnett PA	150 S 5th St #1200 Minneapolis, MN 55402	Electronic Service	No