COMMERCE DEPARTMENT

August 1, 2022

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

RE: **Comments of the Minnesota Department of Commerce, Division of Energy Resources** Docket Nos. E999/CI-17-879, E015/M-21-390, E017/M-21-612, and E002/M-21-694

Dear Mr. Seuffert:

The Minnesota Department of Commerce, Division of Energy Resources (Department) attached comments in the following matters:

In the Matter a Commission Inquiry into Electric Vehicle Charging and Infrastructure In the Matter of Minnesota Power's 2021 Integrated Distribution System Plan In the Matter of Distribution System Planning for Otter Tail Power Company In the Matter of Xcel Energy's 2021 Integrated Distribution System Plan

The Department recommends that the Minnesota Public Utilities Commission (Commission) **approve** the proposal to combine Minnesota Power, Otter Tail Power, and Xcel Energy's Transportation Electrification Plans with their Integrated Distribution Plans.

The Department is available to answer any questions the Commission may have.

Sincerely,

/s/ MATTHEW LANDI Rates Analyst /s/ CHRISTOPHER T DAVIS Analyst Coordinator

ML/CD/ja Attachment

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Before the Minnesota Public Utilities Commission

Comments of the Minnesota Department of Commerce Division of Energy Resources

Docket Nos. E999/CI-17-879, E015/M-21-390, E017/M-21-612, and E002/M-21-694

I. INTRODUCTION

On May 17, 2022, the Minnesota Public Utilities Commission (Commission) issued its *Order Accepting* 2021 Transportation Electrification Plans and Adopting Additional Information Requirements in Docket No. E999/CI-17-879 (May 17, 2022 Order).

Order Point No. 5 of the May 17, 2022 Order delegated authority to the Executive Secretary to consult with utilities and stakeholders on procedural efficiency and timing for future transportation electrification plans (TEPs).

Order Point No. 5 states the following:

The Commission delegates authority to its Executive Secretary to consult with utilities and stakeholders in the current proceeding on procedural efficiency and timing for future transportation electrification plans. A recommendation, anticipated by July 1, 2022, will be filed for a notice of comment with the goal of integrating transportation electrification plans into the November 1, 2023, integrated distribution plans and encouraging each investor-owned utility to file proposals for electric vehicle programs and investments as a portfolio.

In June 2022 over the course of several meetings, the Minnesota Department of Commerce, Division of Energy Resources (Department) met with Commission Staff and representatives from utilities and stakeholders to discuss incorporating existing TEPs into existing IDP requirements for each of Minnesota's investor-owned utilities.

On July 1, 2022, the Commission a Notice of Comment period (Notice) soliciting stakeholder feedback on whether the Commission should combine Minnesota Power, Otter Tail Power, and Xcel Energy's TEPs with their IDPs.

The Notice included seven attachments, summarized in Table 1 below.

Attachment	Description	Docket Number(s)
Attachment A	Minnesota Power IDP-TEP Requirements	E015/M-21-390
Attachment B	Otter Tail Power IDP-TEP Requirements	E017/M-21-612
Attachment C	Xcel Energy IDP-TEP Requirements	E002/M-21-694
Attachment D	Existing TEP Requirements	E999/CI-17-879
Attachment E	Annual EV Report for Minnesota Power	E015/M-15-120, 19-337, 20- 638, and 21-257
Attachment F	Annual EV Report for Otter Tail Power	E017/M-15-112 and 20-181
Attachment G	Annual EV Report for Xcel Energy	E002/M-15-111, 18-643, 19- 186, 19-559, 20-711, 20-745, and 21-101

Table 1. Notice Attachment List

The Notice lists the following topics open for comment:

- 1. Should the Commission combine Minnesota Power, Otter Tail Power, and Xcel Energy's Transportation Electrification Plans (TEPs) with their Integrated Distribution Plans (IDPs)?
- 2. Are the staff-amended IDP filing requirements for Minnesota Power (Attachment A), Otter Tail Power (Attachment B), and Xcel Energy (Attachment C) accurate with the Commission's Order in the TEP and IDP dockets?
 - If proposing changes to the TEP/IDP filing requirements, please provide red-line text of any proposed modifications to the filing requirements with citation and rationale.
 - Please note, IDP requirements that do not relate to transportation electrification are not open for comment for potential modifications at this time.

- 3. Should the Commission discontinue the requirement to file Transportation Electrification Plans biennially on June 1 in Docket 17-879, and instead require utilities to file based on amended IDP filing requirements incorporating TEP topics starting with the November 1, 2023 IDPs?
- 4. Are there other issues or concerns relate to this matter?

The Notice explained that the purpose of the initial merge of the TEPs and IDPs is to migrate the filing requirements from the various TEP orders into the current IDP filing requirements. Any changes to language from the TEP reporting requirements are meant to clarify and align language with what utilities are already reporting, or to remove duplicate information that is provided annually in programmatic reporting.

Further, the Notice explained that utilities will continue to report program specific information in annual reports filed on June 1 of each year.

II. DEPARTMENT ANALYSIS

A. TOPIC #1

The first Notice topic asks whether the Commission should combine Minnesota Power, Otter Tail Power, and Xcel Energy's TEPs with their IDPs.

The Department assisted in the review, stakeholder and utility discussions, and drafting of the combined TEP and IDP filing requirements proposals issued by Commission Staff and represented in Attachments A – C for each investor-owned utility in Minnesota.

Generally, the Department seeks to improve administrative efficiency of utility regulatory proceedings to the extent that such efficiencies result in better outcomes for ratepayers and the public interest, while at the same time maintaining or strengthening the Commission's oversight and regulation of Minnesota's investor-owned utilities.

Combining utility TEPs with IDPs is likely to improve the administrative efficiency of each regulatory proceeding, as transportation electrification and related utility distribution system planning functions are substantially linked to one another, and over time, they are likely to become inextricably linked. Discussing and analyzing each planning process in one proceeding is likely to result in administrative efficiencies for the Department and other parties: when there are one or more planning processes that are substantially similar, often different analysts must be assigned due to competing regulatory priorities. If TEPs and IDPs were combined, time savings may accrue to analysts and result in a better allocation of limited resources. Further, when some proceedings involve analysis of substantially

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similar issues and similar or identical sets of data, having two or more different analysts conduct analysis on those similar issues and/or data may create inconsistencies or lead to inefficiencies.

Last, the stakeholder participation and public salience of the issues being discussed in both TEPs and IDPs are likely to be improved if they were combined into one process. The complexity of regulatory proceedings can itself be a barrier for invaluable stakeholder involvement, especially for nascent regulatory proceedings like TEPs and IDPs that are emerging from their infancy. Some stakeholders may not understand which issues or data should be analyzed in each proceeding or when they should analyze such issues, given that many issues in both TEPs and IDPs are substantially similar. Combining the TEPs and IDPs should increase transparency, reduce a barrier to stakeholder participation and increase the public salience of the issues discussed in both proceedings.

The Department recommends that the Commission combine Minnesota Power, Otter Tail Power, and Xcel Energy's Transportation Electrification Plans with their Integrated Distribution Plans.

B. TOPIC #2

The second Notice topic asks whether the Staff-amended IDP filing requirements for Minnesota Power (Attachment A), Otter Tail Power (Attachment B), and Xcel Energy (Attachment C) are accurate with the Commission's Orders in the TEP and IDP dockets.

The Department appreciates the systematic and meticulous work that Commission Staff put into combining TEP filing requirements with utility IDP filing requirements.

The Department reviewed each of the Commission Orders related to each utility's TEPs and IDPs, and concludes that the Staff-amended IDP filing requirements found in Attachments A through C are accurate.

С. ТОРІС #3

The third Notice topic asks whether the Commission should discontinue the requirement to file TEPs biennially on June 1 in Docket No. E999/CI-17-879, and instead require utilities to file based on Staff-amended IDP filing requirements that incorporate TEP topics starting with the November 1, 2023 IDPs.

The Department supports requiring utilities to file TEP-relevant data and topics in utility IDPs on a biennial basis starting November 1, 2023, which would obviate the need for utilities to file their TEPs on June 1 on a biennial basis.

The Department recommends that the Commission discontinue the requirement for each investorowned utility to file a Transportation Electrification Plan biennially on June 1 in Docket No. E999/CI-17-879.

The Department recommends that the Commission require each investor-owned utility to file information and data related to Transportation Electrification Plans, consistent with the Staffamended Integrated Distribution Plan filing requirements, in each utility's next Integrated Distribution Plan beginning November 1, 2023 and biennially thereafter.

D. TOPIC #4

The fourth Notice topic asks whether there are other issues or concerns related to this matter.

The Department notes that Xcel's proposed IDP Filing Requirement 3.F regarding Transportation Electrification Plans has two additional requirements related to historic and future spending of Xcel's transportation electrification initiatives,¹ compared to Minnesota Power² and Otter Tail Power.³ Xcel has 11 filing requirements under IDP Filing Requirement 3.F compared to only nine for Minnesota Power and Otter Tail Power.

The Department recreates the two additional requirements for Xcel below:

electrification	initiative	<u>s, broke</u>	n down across the section	<u>ns of its budget</u>
Budget Category (ex,	<u>Capital</u>	<u>0&M</u>	Marketing and	Other (provide
distribution, IT, transmission,			Communications	explanation of what is in
<u>etc.)</u>				<u>"other)</u>

10. <u>Xcel shall provide historical spending for the past 5-years on all transportation</u> electrification initiatives, broken down across the sections of its budget

11.

¹ Notice Attachment C, at 11.

² Notice Attachment A, at 10.

³ Notice Attachment B, at 10. The Department notes that Otter Tail Power's IDP Filing Requirements, provided in Attachment B to the Commission's Notice, inadvertently numbered the "Non-Wires (Non-Traditional) Alternatives Analysis" section as Section F, and the new "Transportation Electrification Plan" section as Section E.

12. <u>Xcel shall provide future spending for the next 5-years on all transportation</u> <u>electrification initiatives, broken down across the sections of its budget</u>

Budget Category (ex,	<u>Capital</u>	<u>0&M</u>	Marketing and	Other (provide
distribution, IT, transmission,			Communications	explanation of what is in
<u>etc.)</u>				<u>"other)</u>

These requirements should also apply to Minnesota Power and Otter Tail Power. Requiring Minnesota Power and Otter Tail Power to provide this information would assist the Department and stakeholders better understand utility spending on transportation electrification initiatives. Requiring this information would also provide symmetry between each utility's IDP Filing Requirements for the Transportation Electrification Plan section, which is consistent with the Department's position that IDP Filing Requirements should be similar between utilities to the extent practicable.

The Department recommends that the Commission also include subparts 10 and 11 of Xcel's IDP Filing Requirement 3.F in Minnesota Power's and Otter Tail Power's IDP Filing Requirement 3.F.

The Department has no other issues or concerns related to this matter at this time.

III. DEPARTMENT RECOMMENDATIONS

The Department appreciates the opportunity to comment on this Notice. Below are the Department's initial recommendations:

- The Department recommends that the Commission combine Minnesota Power, Otter Tail Power, and Xcel Energy's Transportation Electrification Plans with their Integrated Distribution Plans.
- The Department recommends that the Commission discontinue the requirement for each investor-owned utility to file a Transportation Electrification Plan biennially on June 1 in Docket No. E999/CI-17-879.

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- The Department recommends that the Commission require each investor-owned utility to file information and data related to Transportation Electrification Plans, consistent with the Staffamended Integrated Distribution Plan filing requirements, in each utility's next Integrated Distribution Plan beginning November 1, 2023 and biennially thereafter.
- The Department recommends that the Commission also include subparts 10 and 11 of Xcel's IDP Filing Requirement 3.F in Minnesota Power's and Otter Tail Power's IDP Filing Requirement 3.F.

CERTIFICATE OF SERVICE

I, Sharon Ferguson, hereby certify that I have this day, served copies of the following document on the attached list of persons by electronic filing, certified mail, e-mail, or by depositing a true and correct copy thereof properly enveloped with postage paid in the United States Mail at St. Paul, Minnesota.

Minnesota Department of Commerce Comments

Docket No. E999/CI-17-879, E015/M-21-390, E017/M-21-612, and E002/M-21-694

Dated this 1st day of August 2022

/s/Sharon Ferguson

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Derek	Bertsch	derek.bertsch@mrenergy.c om	Missouri River Energy Services	3724 West Avera Drive PO Box 88920 Sioux Falls, SD 57109-8920	Electronic Service	No	OFF_SL_21-612_M-21-612
William	Black	bblack@mmua.org	MMUA	Suite 200 3131 Fernbrook Lane Plymouth, MN 55447	Electronic Service North	No	OFF_SL_21-612_M-21-612

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Kenneth	Bradley	kbradley1965@gmail.com		2837 Emerson Ave S Apt CW112 Minneapolis, MN	Electronic Service	No	OFF_SL_21-612_M-21-612
Jon	Brekke	jbrekke@grenergy.com	Great River Energy	55408 12300 Elm Creek	Electronic Service	No	OFF_SL_21-612_M-21-612
				Boulevard Maple Grove, MN 553694718			
Sydney R.	Briggs	sbriggs@swce.coop	Steele-Waseca Cooperative Electric	2411 W. Bridge St PO Box 485 Owatonna, MN 55060-0485	Electronic Service	No	OFF_SL_21-612_M-21-612
Mark B.	Bring	mbring@otpco.com	Otter Tail Power Company	215 South Cascade Street PO Box 496 Fergus Falls, MN 565380496	Electronic Service	No	OFF_SL_21-612_M-21-612
Christina	Brusven	cbrusven@fredlaw.com	Fredrikson Byron	200 S 6th St Ste 4000 Minneapolis, MN 554021425	Electronic Service	No	OFF_SL_21-612_M-21-612
Jason	Burwen	jburwen@cleanpower.org	Energy Storage Association	1155 15th St NW, Ste 500 Washington, DC 20005	Electronic Service	No	OFF_SL_21-612_M-21-612
LORI	CLOBES	Iclobes@mienergy.coop	MiEnergy Cooperative	31110 COOPERATIVE WAY PO BOX 626 RUSHFORD, MN 55971	Electronic Service	No	OFF_SL_21-612_M-21-612
Douglas M.	Carnival	dmc@mcgrannshea.com	McGrann Shea Carnival Straughn & Lamb	N/A	Electronic Service	No	OFF_SL_21-612_M-21-612
Ray	Choquette	rchoquette@agp.com	Ag Processing Inc.	12700 West Dodge Road PO Box 2047 Omaha, NE 68103-2047	Electronic Service	No	OFF_SL_21-612_M-21-612
Kenneth A.	Colburn	kcolburn@symbioticstrategi es.com	Symbiotic Strategies, LLC	26 Winton Road Meredith, NH 32535413	Electronic Service	No	OFF_SL_21-612_M-21-612

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.st ate.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400	Electronic Service	Yes	OFF_SL_21-612_M-21-612
				St. Paul, MN 55101			
Brooke	Cooper	bcooper@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022191	Electronic Service	No	OFF_SL_21-612_M-21-612
George	Crocker	gwillc@nawo.org	North American Water Office	PO Box 174 Lake Elmo, MN 55042	Electronic Service	No	OFF_SL_21-612_M-21-612
David	Dahlberg	davedahlberg@nweco.com	Northwestern Wisconsin Electric Company	P.O. Box 9 104 South Pine Street Grantsburg, WI 548400009	Electronic Service	No	OFF_SL_21-612_M-21-612
James	Denniston	james.r.denniston@xcelen ergy.com	Xcel Energy Services, Inc.	414 Nicollet Mall, 401-8 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_21-612_M-21-612
Curt	Dieren	curt.dieren@dgr.com	L&O Power Cooperative	1302 S Union St Rock Rapids, IA 51246	Electronic Service	No	OFF_SL_21-612_M-21-612
Carlon	Doyle Fontaine	carlon.doyle.fontaine@sen ate.mn	MN Senate	75 Rev Dr Martin Luther King Jr Blvd Room G-17 St Paul, MN 55155	Electronic Service	No	OFF_SL_21-612_M-21-612
Brian	Draxten	bhdraxten@otpco.com	Otter Tail Power Company	P.O. Box 496 215 South Cascade S Fergus Falls, MN 565380498	Electronic Service reet	No	OFF_SL_21-612_M-21-612
Kristen	Eide Tollefson	healingsystems69@gmail.c om	R-CURE	28477 N Lake Ave Frontenac, MN 55026-1044	Electronic Service	No	OFF_SL_21-612_M-21-612

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Betsy	Engelking	betsy@nationalgridrenewa bles.com	Geronimo Energy, LLC	8400 Normandale Lake Blvd Ste 1200 Bloomington, MN 55437	Electronic Service	No	OFF_SL_21-612_M-21-612
Oncu	Er	oncu.er@avantenergy.com	Avant Energy, Agent for MMPA	220 S. Sixth St. Ste. 1300 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-612_M-21-612
James C.	Erickson	jericksonkbc@gmail.com	Kelly Bay Consulting	17 Quechee St Superior, WI 54880-4421	Electronic Service	No	OFF_SL_21-612_M-21-612
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_21-612_M-21-612
Christian	Fenstermacher	christian.fenstermacher@o watonnautilities.com	Owatonna Municipal Public Utilities	PO Box 800 208 S Walnut Ave Owatonna, MN 55060	Electronic Service	No	OFF_SL_21-612_M-21-612
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_21-612_M-21-612
Nathan	Franzen	nathan@nationalgridrenew ables.com	Geronimo Energy, LLC	8400 Normandale Lake Blvd Ste 1200 Bloomington, MN 55437	Electronic Service	No	OFF_SL_21-612_M-21-612
Jessica	Fyhrie	jfyhrie@otpco.com	Otter Tail Power Company	PO Box 496 Fergus Falls, MN 56538-0496	Electronic Service	Yes	OFF_SL_21-612_M-21-612

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Edward	Garvey	garveyed@aol.com	Residence	32 Lawton St Saint Paul, MN 55102	Electronic Service	No	OFF_SL_21-612_M-21-612
Bruce	Gerhardson	bgerhardson@otpco.com	Otter Tail Power Company	PO Box 496 215 S Cascade St Fergus Falls, MN 565380496	Electronic Service	No	OFF_SL_21-612_M-21-612
Allen	Gleckner	gleckner@fresh-energy.org	Fresh Energy	408 St. Peter Street Ste 350 Saint Paul, Minnesota 55102	Electronic Service	No	OFF_SL_21-612_M-21-612
Jenny	Glumack	jenny@mrea.org	Minnesota Rural Electric Association	11640 73rd Ave N Maple Grove, MN 55369	Electronic Service	No	OFF_SL_21-612_M-21-612
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	OFF_SL_21-612_M-21-612
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Adam	Heinen	aheinen@dakotaelectric.co m	Dakota Electric Association	4300 220th St W Farmington, MN 55024	Electronic Service	No	OFF_SL_21-612_M-21-612
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	OFF_SL_21-612_M-21-612
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Casey	Jacobson	cjacobson@bepc.com	Basin Electric Power Cooperative	1717 East Interstate Avenue Bismarck, ND 58501	Electronic Service	No	OFF_SL_21-612_M-21-612
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Nate	Jones	njones@hcpd.com	Heartland Consumers Power	PO Box 248 Madison, SD 57042	Electronic Service	No	OFF_SL_21-612_M-21-612
Michael	Kampmeyer	mkampmeyer@a-e- group.com	AEG Group, LLC	260 Salem Church Road Sunfish Lake, Minnesota 55118	Electronic Service	No	OFF_SL_21-612_M-21-612

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Brad	Klein	bklein@elpc.org	Environmental Law & Policy Center	35 E. Wacker Drive, Suite 1600 Suite 1600 Chicago, IL 60601	Electronic Service	No	OFF_SL_21-612_M-21-612
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Chris	Kopel	chrisk@CMPASgroup.org	Central Minnesota Municipal Power Agency	459 S Grove St Blue Earth, MN 56013-2629	Electronic Service	No	OFF_SL_21-612_M-21-612
Brian	Krambeer	bkrambeer@mienergy.coo p	MiEnergy Cooperative	PO Box 626 31110 Cooperative Wa Rushford, MN 55971	Electronic Service ay	No	OFF_SL_21-612_M-21-612
Michael	Krause	michaelkrause61@yahoo.c om	Kandiyo Consulting, LLC	433 S 7th Street Suite 2025 Minneapolis, Minnesota 55415	Electronic Service	No	OFF_SL_21-612_M-21-612
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Matthew	Lacey	Mlacey@grenergy.com	Great River Energy	12300 Elm Creek Boulevard Maple Grove, MN 553694718	Electronic Service	No	OFF_SL_21-612_M-21-612
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Dean	Leischow	dean@sunrisenrg.com	Sunrise Energy Ventures	315 Manitoba Ave Ste 200 Wayzata, MN 55391	Electronic Service	No	OFF_SL_21-612_M-21-612
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Susan	Ludwig	sludwig@mnpower.com	Minnesota Power	30 West Superior Street Duluth, MN 55802	Electronic Service	No	OFF_SL_21-612_M-21-612
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Pam	Marshall	pam@energycents.org	Energy CENTS Coalition	823 7th St E St. Paul, MN 55106	Electronic Service	No	OFF_SL_21-612_M-21-612
Samuel	Mason	smason@beltramielectric.c om	Beltrami Electric Cooperative, Inc.	4111 Technology Dr. NW PO Box 488 Bernidji, MN 56619-0488	Electronic Service	No	OFF_SL_21-612_M-21-612
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Dave	McNary	David.McNary@hennepin.u s	Hennepin County DES	701 Fourth Ave S Ste 700 Minneapolis, MN 55415-1842	Electronic Service	No	OFF_SL_21-612_M-21-612
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Carl	Nelson	cnelson@mncee.org	Center for Energy and Environment	212 3rd Ave N Ste 560 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_21-612_M-21-612
Dale	Niezwaag	dniezwaag@bepc.com	Basin Electric Power Cooperative	1717 East Interstate Avenue Bismarck, ND 58503	Electronic Service	No	OFF_SL_21-612_M-21-612
David	Niles	david.niles@avantenergy.c om	Minnesota Municipal Power Agency	220 South Sixth Street Suite 1300 Minneapolis, Minnesota 55402	Electronic Service	No	OFF_SL_21-612_M-21-612
Sephra	Ninow	sephra.ninow@energycent er.org	Center for Sustainable Energy	426 17th Street, Suite 700 Oakland, CA 94612	Electronic Service	No	OFF_SL_21-612_M-21-612
Rolf	Nordstrom	rnordstrom@gpisd.net	Great Plains Institute	2801 21ST AVE S STE 220 Minneapolis, MN 55407-1229	Electronic Service	No	OFF_SL_21-612_M-21-612
Samantha	Norris	samanthanorris@alliantene rgy.com	Interstate Power and Light Company	200 1st Street SE PO Box 351 Cedar Rapids, IA 524060351	Electronic Service	No	OFF_SL_21-612_M-21-612

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Jeff	O'Neill	jeff.oneill@ci.monticello.mn .us	City of Monticello	505 Walnut Street Suite 1 MonticeIllo, Minnesota 55362	Electronic Service	No	OFF_SL_21-612_M-21-612
Russell	Olson	rolson@hcpd.com	Heartland Consumers Power District	PO Box 248 Madison, SD 570420248	Electronic Service	No	OFF_SL_21-612_M-21-612
Dan	Patry	dpatry@sunedison.com	SunEdison	600 Clipper Drive Belmont, CA 94002	Electronic Service	No	OFF_SL_21-612_M-21-612
Jeffrey C	Paulson	jeff.jcplaw@comcast.net	Paulson Law Office, Ltd.	4445 W 77th Street Suite 224 Edina, MN 55435	Electronic Service	No	OFF_SL_21-612_M-21-612
Jennifer	Peterson	jjpeterson@mnpower.com	Minnesota Power	30 West Superior Street Duluth, MN 55802	Electronic Service	No	OFF_SL_21-612_M-21-612
Hannah	Polikov	hpolikov@aee.net	Advanced Energy Economy Institute	1000 Vermont Ave, Third Floor Washington, DC 20005	Electronic Service	No	OFF_SL_21-612_M-21-612
David G.	Prazak	dprazak@otpco.com	Otter Tail Power Company	P.O. Box 496 215 South Cascade S Fergus Falls, MN 565380496	Electronic Service treet	No	OFF_SL_21-612_M-21-612
Mark	Rathbun	mrathbun@grenergy.com	Great River Energy	12300 Elm Creek Blvd Maple Grove, MN 55369	Electronic Service	No	OFF_SL_21-612_M-21-612

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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John C.	Reinhardt	N/A	Laura A. Reinhardt	3552 26th Ave S Minneapolis, MN 55406	Paper Service	No	OFF_SL_21-612_M-21-612
Generic Notice	Residential Utilities Division	residential.utilities@ag.stat e.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_21-612_M-21-612
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_21-612_M-21-612
Michael	Riewer	MRiewer@otpco.com	Otter Tail Power Company	PO Box 4496 Fergus Falls, MN 56538-0496	Electronic Service	Yes	OFF_SL_21-612_M-21-612
Robert K.	Sahr	bsahr@eastriver.coop	East River Electric Power Cooperative	P.O. Box 227 Madison, SD 57042	Electronic Service	No	OFF_SL_21-612_M-21-612
Richard	Savelkoul	rsavelkoul@martinsquires.c om	Martin & Squires, P.A.	332 Minnesota Street Ste W2750 St. Paul, MN 55101	Electronic Service	No	OFF_SL_21-612_M-21-612
Thomas	Scharff	thomas.scharff@versoco.c om	Verso Corp	600 High Street Wisconsin Rapids, WI 54495	Electronic Service	No	OFF_SL_21-612_M-21-612
Кау	Schraeder	kschraeder@minnkota.com	Minnkota Power	5301 32nd Ave S Grand Forks, ND 58201	Electronic Service	No	OFF_SL_21-612_M-21-612
Dean	Sedgwick	Sedgwick@Itascapower.co m	Itasca Power Company	PO Box 455 Spring Lake, MN 56680	Electronic Service	No	OFF_SL_21-612_M-21-612

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Anne	Smart	anne.smart@chargepoint.c om	ChargePoint, Inc.	254 E Hacienda Ave Campbell, CA 95008	Electronic Service	No	OFF_SL_21-612_M-21-612
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Eric	Swanson	eswanson@winthrop.com	Winthrop & Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_21-612_M-21-612
Peter	Teigland	pteigland@mnseia.org	Minnesota Solar Energy Industries Association	2288 University Ave W Saint Paul, MN 55114	Electronic Service	No	OFF_SL_21-612_M-21-612
Stuart	Tommerdahl	stommerdahl@otpco.com	Otter Tail Power Company	215 S Cascade St PO Box 496 Fergus Falls, MN 56537	Electronic Service	Yes	OFF_SL_21-612_M-21-612
Pat	Treseler	pat.jcplaw@comcast.net	Paulson Law Office LTD	4445 W 77th Street Suite 224 Edina, MN 55435	Electronic Service	No	OFF_SL_21-612_M-21-612
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Robyn	Woeste	robynwoeste@alliantenerg y.com	Interstate Power and Light Company	200 First St SE Cedar Rapids, IA 52401	Electronic Service	No	OFF_SL_21-612_M-21-612
Christopher	Zibart	czibart@atcllc.com	American Transmission Company LLC	W234 N2000 Ridgeview Pkwy Court Waukesha, WI 53188-1022	Electronic Service	No	OFF_SL_21-612_M-21-612

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Gail	Baranko	gail.baranko@xcelenergy.c om	Xcel Energy	414 Nicollet Mall7th Floor Minneapolis, MN 55401	Electronic Service	No	OFF_SL_21-694_21-694
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Zoe	Bourgerie	zoe.bourgerie@minneapoli smn.gov	Minneapolis City of Lakes	350 S 5th St Rm 307 Minneapolis, MN 55415	Electronic Service	No	OFF_SL_21-694_21-694
Kenneth	Bradley	kbradley1965@gmail.com		2837 Emerson Ave S Apt CW112 Minneapolis, MN 55408	Electronic Service	No	OFF_SL_21-694_21-694
Elizabeth	Brama	ebrama@taftlaw.com	Taft Stettinius & Hollister LLP	2200 IDS Center 80 South 8th Street Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-694_21-694
Jon	Brekke	jbrekke@grenergy.com	Great River Energy	12300 Elm Creek Boulevard Maple Grove, MN 553694718	Electronic Service	No	OFF_SL_21-694_21-694
Sydney R.	Briggs	sbriggs@swce.coop	Steele-Waseca Cooperative Electric	2411 W. Bridge St PO Box 485 Owatonna, MN 55060-0485	Electronic Service	No	OFF_SL_21-694_21-694

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Mark B.	Bring	mbring@otpco.com	Otter Tail Power Company	215 South Cascade Street PO Box 496 Fergus Falls, MN 565380496	Electronic Service	No	OFF_SL_21-694_21-694
Janet	Brown	jab5100@gmail.com	Sabathani Community Center (Sabathani/SCC)	310 E 38th St Ste 200 Minneapolis, MN 55409	Electronic Service	No	OFF_SL_21-694_21-694
Christina	Brusven	cbrusven@fredlaw.com	Fredrikson Byron	200 S 6th St Ste 4000 Minneapolis, MN 554021425	Electronic Service	No	OFF_SL_21-694_21-694
Jason	Burwen	jburwen@cleanpower.org	Energy Storage Association	1155 15th St NW, Ste 500 Washington, DC 20005	Electronic Service	No	OFF_SL_21-694_21-694
LORI	CLOBES	Iclobes@mienergy.coop	MiEnergy Cooperative	31110 COOPERATIVE WAY PO BOX 626 RUSHFORD, MN 55971	Electronic Service	No	OFF_SL_21-694_21-694
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_21-694_21-694
Douglas M.	Carnival	dmc@mcgrannshea.com	McGrann Shea Carnival Straughn & Lamb	N/A	Electronic Service	No	OFF_SL_21-694_21-694
Ray	Choquette	rchoquette@agp.com	Ag Processing Inc.	12700 West Dodge Road PO Box 2047 Omaha, NE 68103-2047	Electronic Service	No	OFF_SL_21-694_21-694
John	Coffman	john@johncoffman.net	AARP	871 Tuxedo Blvd. St, Louis, MO 63119-2044	Electronic Service	No	OFF_SL_21-694_21-694
Kenneth A.	Colburn	kcolburn@symbioticstrategi es.com	Symbiotic Strategies, LLC	26 Winton Road Meredith, NH 32535413	Electronic Service	No	OFF_SL_21-694_21-694

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.st ate.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-694_21-694
Riley	Conlin	riley.conlin@stoel.com	Stoel Rives LLP	33 S. 6th Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-694_21-694
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George	Crocker	gwillc@nawo.org	North American Water Office	PO Box 174 Lake Elmo, MN 55042	Electronic Service	No	OFF_SL_21-694_21-694
David	Dahlberg	davedahlberg@nweco.com	Northwestern Wisconsin Electric Company	P.O. Box 9 104 South Pine Street Grantsburg, WI 548400009	Electronic Service	No	OFF_SL_21-694_21-694
James	Denniston	james.r.denniston@xcelen ergy.com	Xcel Energy Services, Inc.	414 Nicollet Mall, 401-8 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_21-694_21-694
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Carlon	Doyle Fontaine	carlon.doyle.fontaine@sen ate.mn	MN Senate	75 Rev Dr Martin Luther King Jr Blvd Room G-17 St Paul, MN 55155	Electronic Service	No	OFF_SL_21-694_21-694
Brian	Draxten	bhdraxten@otpco.com	Otter Tail Power Company	P.O. Box 496 215 South Cascade S Fergus Falls, MN 565380498	Electronic Service reet	No	OFF_SL_21-694_21-694

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Thomas	Koehler	TGK@IBEW160.org	Local Union #160, IBEW	2909 Anthony Ln St Anthony Village, MN 55418-3238	Electronic Service	No	OFF_SL_21-694_21-694
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Brian	Krambeer	bkrambeer@mienergy.coo p	MiEnergy Cooperative	PO Box 626 31110 Cooperative Wa Rushford, MN 55971	Electronic Service ay	No	OFF_SL_21-694_21-694
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Jeff	O'Neill	jeff.oneill@ci.monticello.mn .us	City of Monticello	505 Walnut Street Suite 1 Monticelllo, Minnesota 55362	Electronic Service	No	OFF_SL_21-694_21-694
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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