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March 1, 2022

—Via Electronic Filing—

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

RE: 2021 ANNUAL REPORT
COMMISSION INVESTIGATION INTO SELF-COMMITMENT AND SELF-
SCHEDULING OF LARGE BASELOAD GENERATION FACILITIES
DOCKET NO. E999/CI-19-704

PLAN TO OFFER GENERATING RESOURCES INTO THE MISO MARKET ON A
SEASONAL BASIS
DOCKET NO. E002/M-19-809

Dear Mr. Seuffert:

Northern States Power Company, doing business as Xcel Energy, submit this annual report analyzing the Company's 2021 results of and future options for seasonal dispatch, self-commitment and self-scheduling in compliance with the Minnesota Public Utilities Commission's February 7, 2019 Order in Docket Nos. E999/AA-17-492 and E999/AA-18-373, November 13, 2019 Order in Docket No. E999/AA-18-373, July 15, 2020 Order in Docket No. E002/M-19-908, and January 11, 2021 and December 1, 2021 Orders in Docket Nos. E999/CI-19-704.

Please note that portions of Attachment A, B C, and E are marked as "Not Public." Certain data is considered to be "not public data" pursuant to Minn. Stat. §13.02, Subd.9, and is "Trade Secret" information pursuant to Minn. Stat. §13.37, subd. 1(b) as this data derives independent economic value, actual or potential, from not being generally known to, and not being readily ascertainable by proper means by other persons who can obtain economic value from its disclosure or use.

Pursuant to Minn. Stat. § 216.17, subd. 3, we have electronically filed this document, and served copies of the summary on the parties on the attached service list.

Please contact Rebecca Eilers at rebecca.d.eilers@xcelenergy.com / 612-330-5570 or me at christopher.j.shaw@xcelenergy.com / 612- 330-7974 if you have any questions regarding this filing.

SINCERELY,

/s/

CHRISTOPHER SHAW
MANAGER, REGULATORY POLICY

Enclosures
c: Service List

STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION

Katie J. Sieben	Chair
Valerie Means	Commissioner
Matthew Schuerger	Commissioner
Joseph K. Sullivan	Commissioner
John A. Tuma	Commissioner

IN THE MATTER OF AN INVESTIGATION
INTO SELF-COMMITMENT AND SELF-
SCHEDULING OF LARGE BASELOAD
GENERATION FACILITIES

DOCKET No. E999/CI-19-704

IN THE MATTER OF THE PETITION OF
NORTHERN STATES POWER COMPANY FOR
APPROVAL OF A PLAN TO OFFER
GENERATING RESOURCES INTO THE
MISO MARKET ON A SEASONAL BASIS

DOCKET No. E002/M-19-809

ANNUAL REPORT

OVERVIEW

Northern States Power Company, doing business as Xcel Energy, submits this annual report analyzing the Company's commitment of its baseload generation and options for seasonal dispatch, self-commitment and self-scheduling in compliance with several Orders issued by the Minnesota Public Utilities Commission:

- Docket Nos. E999/AA-17-492 and E999/AA-18-373, ORDER ACCEPTING 2016-2017 REPORTS AND SETTING ADDITIONAL REQUIREMENTS, February 7, 2019 (February 7 Order);
- Docket No. E999/AA-18-373, ORDER ACCEPTING 2017-2018 ELECTRIC REPORTS AND SETTING ADDITIONAL REQUIREMENTS, November 13, 2019 (November 13 Order); and
- Docket Nos. E999/CI-19-704 and E002/M-19-809, ORDER EVALUATING SELF-COMMITMENT AND SELF-SCHEDULING REPORTS AND ESTABLISHING ADDITIONAL FILING REQUIREMENTS, January 11, 2021 (January 11 Order).
- Docket No. E999/CI-19-704, ORDER ACCEPTING REPORTS AND SETTING ADDITIONAL REQUIREMENTS, December 1, 2021 (December 1 Order).

We include additional reporting related to the Company's plan to offer generating resources into the MISO market on a seasonal basis as required by the Commission's July 15, 2020 ORDER APPROVING PLAN AND REQUIRING FILING in Docket No. E002/M-19-809 (July 15 Order).

We provide the requested analysis for calendar year 2021.

ANNUAL REPORT

A. Analysis of Self-Commitment and Self-Scheduling Decisions for Calendar Year 2021

In compliance with the above-noted Orders, we provide an analysis of self-commitment and self-scheduling decisions made during the calendar year 2021 reporting period.

The Company analyzed the economic impact of its self-commit actions for the period January – December 2021 by comparing the MISO day-ahead and real-time (DART) revenues and charges that Xcel Energy received from its self-commit approach for certain resources to the production costs of those resources to determine margin. While we cannot perform a what-if margin analysis of allowing MISO to commit and dispatch the Xcel Energy units, the Company did analyze the total DART margins of the actions it did take to self-commit these resources.

The analysis evaluates actions taken for Xcel Energy's baseload units, exclusive of its Refuse Derived Fuel units. Additionally, the combined cycle and simple cycle combustion turbines are not included in the analysis because these generating resources are offered to MISO as economic units unless testing or operating directives (*i.e.* MISO or transmission operations directives) require otherwise. The baseload units included in the analysis comprise a large part of the Company's MISO settlement and are the bulk of our strategic self-commit decisions. Since 2019, the Company's practice is to offer our coal facilities with an economic commit status – as opposed to self-commit – as much as possible. The Company began in fall 2020 to suspend normal operations at King Plant and Sherco 2 during non-peak seasons, as discussed in Docket No. E002/M-19-809.

In evaluating instances of self-commitment of these units, we also excluded hours when Xcel Energy's self-commit action in the MISO market was unavoidable (*e.g.*, mandatory generating resource testing, fuel and steam offtake contract requirements, system reliability, and generating resource maintenance outages). These instances are noted in Attachments A and B in compliance with the January 11 Order.

The resulting DART margin by resource is shown in Figure 1. The DART margin during the strategic self-commit for the period was \$651,064,808 which means that market revenues during these self-commitment periods exceeded the production costs of the units as offered to MISO.

The Company has economically dispatched its nuclear units in MISO’s Day Ahead market since September 2019, in an effort to provide additional flexibility to the market. During conversations about fuel procurement for nuclear plants, we determined that the timing and amount of fuel procured during refueling could not be altered by the economic dispatch efforts that the Company had undertaken. Rather, the fuel costs for nuclear were treated as a fixed cost in this analysis, and these fuel costs were removed from the incremental offer prices for nuclear effective June 27, 2020. For purposes of this report, the estimated nuclear fuel costs are treated as fixed costs, and are included as “Remaining Fuel Costs” in the reporting as of June 27, 2020.

Figure 1: 2021 DART Margin for Non-Discretionary Self-Commit of Baseload Units

2021 Non-Discretionary Day Ahead and Real Time Margins for NSP Base Load Resources							
Net MISO Payment Less Production Cost - (cost)/benefit							
NSP.KING1	NSP.SHERCO1	NSP.SHERCO2	NSP.SHERCO3	NSP.PRISL1	NSP.PRISL2	NSP.MNTCEL1	TOTAL
\$ 21,325,595	\$ 49,471,027	\$ 46,109,928	\$ 19,984,377	\$ 170,744,069	\$ 147,467,086	\$ 195,962,727	\$ 651,064,808
Net MISO Payment Less Total Production Cost Including Remaining Unit Fuel Cost - (cost)/benefit							
NSP.KING1	NSP.SHERCO1	NSP.SHERCO2	NSP.SHERCO3	NSP.PRISL1	NSP.PRISL2	NSP.MNTCEL1	TOTAL
\$ 21,325,595	\$ 49,471,027	\$ 46,109,928	\$ 19,984,377	\$ 129,948,771	\$ 112,213,302	\$ 161,023,147	\$ 540,076,146

We believe this DART margin data represents an appropriate metric for determining whether the Company’s self-commitment decisions were beneficial, and the data provided in Figure 1 demonstrates that the Company’s customers received value as a result of its decision to self-commit the baseload resources.

The Company has provided detailed analysis of the consequences of self-commitment of its generators in Attachments A, B and C, which include the required hourly, monthly or annual data items a through z, by unit, as detailed in Attachment A of the January 11 Order,¹ in addition to items noted in Order Point Nos. 8b, 8c, and 9 of the December 1 Order. We note that, when the Company submits a commit status of “Must-Run” for a unit (self-commits), it designates a resource as committed to MISO per Xcel Energy’s request and makes the resource available for dispatch by MISO.

¹ Attachment A provides items a-t for coal units; Attachment B provides items a-t for nuclear units; Attachment C provides items u-z. We note that due to file size, only the first lines of each hourly tab include live formulas.

To self-schedule for energy, Xcel Energy would have to submit a resource to operate at a specific MW value or operating level for energy and set the energy dispatch status to “Self-Schedule.” For January – December 2021, Xcel Energy did not find any instances of self-scheduling of resources for energy; therefore, Attachments A-C do not capture the consequences of self-scheduling. The attachments do, however, present the impact of self-commitment.

As stated above, the analysis only includes instances when Xcel Energy strategically self-commits select baseload units. There are circumstances when self-commit is unavoidable, such as testing, operating directives from MISO or Transmission Operations, or third-party contractual requirements. Strategic decisions to self-commit units are based on a number of considerations, including MISO model limitations, contractual obligations, and system reliability.

Xcel Energy also strongly considers reliability when making decisions about self-committing units. Extreme weather conditions, elevated MISO conditions, high load days, tight capacity conditions, and transmission requirements increase reliability risks and are factored into our decisions to self-commit units.

Xcel Energy constantly monitors system conditions, looking for opportunities to lower customer costs. At times when we believe system reliability risks are low, as when renewable generation is forecasted to be high, loads are forecasted to be low, and plant availability is high, we have offered baseload units into MISO as economic, making them available to be de-committed. As noted above, since 2019 the Company’s practice is to offer our coal facilities with an economic commit status.

In addition, Xcel Energy continually evaluates opportunities to provide resource flexibility to MISO. Widening unit dispatch ranges, improving unit start capabilities, reducing cycling times, and exploring nuclear flexible operations gives MISO more opportunities to commit and dispatch our units economically.

Xcel Energy also seeks market changes that will accommodate better economic commit and dispatch opportunities. The development of a multi-day financial commitment market design in MISO will optimize these long lead resources, such as coal units, across multiple days while still honoring their operating parameters. A multi-day commitment process is able to evaluate reliability risks and minimize total production costs over a longer time horizon, making it a superior process and better suited to also optimize baseload resources with slower start-up times and longer minimum down times. Without a multi-day commitment there is less assurance that the market will commit and de-commit these units in an optimal manner on behalf of customers. Xcel Energy has been and remains an advocate for a multi-day

commitment process for multiple years. At this time, MISO has postponed work on a multi-day commitment process.

1. *Minimum Operating Levels*

NSP continuously seeks to improve operational flexibility for its generating units and as part of this effort, NSP has worked to reduce the minimum required loading at Sherco 1 and Sherco 2 from 260 MW to 215 MW. This increased “turndown capability” produced an estimated \$236,000 in customer benefits in 2021. These benefits are calculated by comparing MISO Day Ahead/Real Time energy margins when the unit was in turndown to the estimated margins had the unit only dispatched to its previous economic minimum. Margins are based on MISO estimated energy settlement less unit production costs. Lower operational minimums accommodate additional renewables generation, decreases carbon emissions, and reduces production costs.

2. *Changes Plant Operating Procedures and Physical Modifications*

Order Point 8e of the December 1 Order requires utilities to provide descriptions of changes to operating procedures and physical modifications to units to ensure plants are becoming more flexible to meet upcoming challenges as applicable.

The Company’s base load coal plants, Sherco and King, perform testing, boiler tuning, and revised operating procedures to lower the minimum operating load and increase ramp rate within equipment and environmental limits. This allows the units to stay online versus shutting down during short duration of low electric grid loads or high renewable energy production. Additionally, King which was the first unit assigned to Seasonal Dispatch, created a Seasonal Dispatch Best Practices document to address maintenance, layup, and equipment management during extended shutdowns.

3. *Best and Worst Case Scenario Analysis*

Order Point 10 of the December 1 Order requires the utilities to work together to develop a consistent method for estimating the best-case and worst-case potential for economic commitment for each plant. The utilities met and agreed that the best case scenario can be represented by a year-round economic commitment scenario and a worst case scenario can be represented by a year-round self-commitment or must-run scenario.

In the worst case scenario, we assumed all historic outages and all the offered costs and adders for each unit for the year. For all hours outside of the outages, the unit was must run by the model. In the best case scenario, we assumed all existing constraints, such as outages and nondiscretionary must-runs of the units, but allowed the units to be economically committed all other hours. We also assumed all offered costs and adders that we had for the year for this case. Commitment decisions by the PLEXOS model were based on the economics of the unit over a 24-hour commit period, similar to how MISO would make commit decisions. In the Economic case, we also calculated an estimated Make Whole Payment to replicate recovery of start costs and losses for the first 24 hours of a unit's operation when the model committed the unit.

The best and worst case scenario analysis studies each unit individually relative to a fixed market price curve. The results of this analysis are provided as Attachment D. While the best case scenario resulted in higher margins than the worst case for King and Sherco Units 1 and 2, the model results show higher margins in the worst case scenario for Sherco 3. This unexpected result highlights the limits of the current MISO commitment construct, which considers the next 24 hours to determine whether to commit a unit rather than a multi-day look forward. The start costs for Sherco 3 are higher than other units, which means that, in order to bring the unit online, the LMPs over the next 24-hour period must be higher than for our other coal units. The commitment construct resulted in periods of time where the unit was not committed although it would have been economic to bring the unit online if multiple days were considered.

B. Analysis of Economic and Seasonal Dispatch Options at Sherco Units 1 and 3

1. Impacts of SMMPA Partnership on Dispatch of Sherco 3

As discussed our 2020 annual report, the original joint operating agreement between Xcel Energy and Southern Minnesota Municipal Power Agency (SMMPA) provided little opportunity to economically commit Sherco 3 to the MISO market. Under the agreement, each partner was its own Market Participant managing their pro-rata offer of the plant to MISO. With this arrangement, if the partners offer their respective share of the unit economically to MISO, MISO may commit one share of the facility, but not the other. However, the commitment of one share of Sherco 3 necessitates the operation of the other partner's share, regardless of economic opportunities to decommit the other portion, as the operating minimum of the total facility requires both shares.

Both Xcel Energy and SMMPA recognize that there are opportunities to offering Sherco 3 economically to MISO; therefore, both parties came to an agreement on how to offer economically to the market. Xcel Energy and SMMPA signed a Sherco 3 MISO Coordination Agreement, effective March 1, 2021, to combine each company's share of the plant into a single asset to be offered to MISO. Xcel Energy is the Market Participant for the total Sherco 3 unit in the MISO market, managing its registration, offer, metering, and settlements. The agreement coordinates the exchange of participants' costs and fuel requirements in order to effectively manage unit parameters into a single offer package. As with our other coal units, there will be instances where Sherco 3 will have to be self-committed, such as for testing, fuel contract mandates and system reliability, but this new arrangement does offer much more opportunity for economic cycling as MISO will be committing the total unit, as opposed to each individual partner's share.

As a result of this agreement, Sherco 3 was first offered economically to MISO on March 19, 2021. The result of this strategy versus self-committing the unit for the balance of 2021 was a loss of \$4.0 million in margins at the unit, meaning that the unit's margins could have been \$4.0 million higher if we had self-committed the unit in 2021. There were long periods when MISO did not commit the unit and market prices exceeded the unit's operating costs. MISO may not have committed the unit because MISO does not have a multi-day commit model, which we have advocated for and discussed elsewhere in this docket. The unit was still profitable, however, with Xcel Energy's share of Sherco 3 margins at \$17 million from March 19-December 31, 2021. The economic strategy did result in a reduction of an estimated 1.9 billion pounds of carbon dioxide (CO₂) emissions due to lower generation.

As discussed in our January 20, 2022 letter, SMMPA requested that Sherco 3 be committed on a Must Run basis through February 2022 to ensure the unit is available for any extreme weather event for the remainder of the winter season. Due to higher market prices since its Must Run, Sherco 3 has been profitable. We plan to resume offering Sherco 3 on an economic basis beginning in mid-March.

2. *Analysis of Sherco 1 Economic Dispatch Feasibility and Auxiliary Boiler Project Update*

The Commission's December 1 Order directed the Company to update the Commission and stakeholders in the next annual report on when milestones in the Sherco auxiliary boiler project are reached, including: completion of boiler construction; approval, denial, or delay of the Air Emission Permit amendment; decisions made by Xcel Energy and/or Liberty Paper, Inc. relating to the sources of steam used by Liberty Paper, Inc.; and updates to the feasibility and use of economic

commitment at Sherco Unit 1. As discussed in our 2020 annual report, we are replacing two Auxiliary Boilers (ABs) at the Sherco plant that were in poor condition. The new ABs are needed to provide a reliable source of steam supply for unit cold startup for the existing power plant and building heating. The ABs are being replaced with larger capacity boilers to ensure reliable operation of the Sherco Units through the end of their useful lives. We had anticipated completing the replacement of the ABs by the end of 2021.

The ABs are designed to operate using either oil or natural gas. The oil capabilities have been installed and are operational and can provide a source of energy in an emergency. Work on installation of natural gas capability to the ABs is ongoing and expected to be operational by the end of 2022. We are in the process of filing the air permit amendment to allow for more hours of use. Until the air permit amendment is approved, we remain subject to AB operation limitations, but we will look for opportunities to offer Sherco 1 on an economic basis once the gas capabilities are operational.

In the interim, since Sherco 2 is already being offered into the market on a seasonal basis, and we began to offer Sherco 3 on an economic commitment basis beginning in March 2021, we plan to keep Sherco 1 available to provide auxiliary steam, until the new ABs are available for firing on natural gas.

3. *Annual Carbon Dioxide Emissions*

Table 1 below shows the total carbon dioxide emissions by unit in 2021. Emissions for Sherco 3 reflect Xcel Energy’s share.

Table 1: 2021 CO2 Emissions by Unit

Unit	Tons
King	1,545,215
Sherco 1	3,051,380
Sherco 2	3,898,059
Sherco 3	2,224,536

4. *Equivalent Forced Outage Rates*

Per Order Point No. 8d of the December 1 Order, we provide the Equivalent Forced Outage Rates (EFORs) as Attachment E.

5. *Conclusion*

Due to current capacity needs, we are not able to offer additional units on a seasonal basis at this time. However, we began to offer Sherco 3 on an economic basis on March 19, 2021. While the move to economic cycling at Sherco 3 resulted in the loss of some margins this year, the carbon reductions were significant. In addition, we will look for opportunities to offer Sherco 1 on an economic basis once natural gas capabilities at the ABs is operational as discussed above. We will continue to assess the status of these units and our capacity needs with a goal of being able to offer these resources into the market in the best interest of our customers.

C. Analysis of Seasonal Dispatch Plan Implementation at King and Sherco 2

1. Comparison of Must-Commit, Economic Commit and Seasonal Commit Scenarios and Emissions

In compliance with the July 15 Order, we provide the following analysis of our Unit Commitment Plan for King and Sherco 2 (or 1), under which we seasonally dispatched those units beginning in fall 2020. Seasonal Operations occurs from March-May and again from September-November. In 2021, the Company switched between Sherco 1 and 2 as seasonally operating units due to unit outages and steam obligations. When Sherco 1 was in planned outage, we transferred MISO capacity obligations from Sherco 1 to Sherco 2 making Unit 1 the seasonal operations unit and allowing Unit 2 to be online to serve steam obligations. We then transferred the capacity obligation back to Unit 1 when it was available again and then made Unit 2 the seasonal unit. The analysis below reflects when each unit was designated as the seasonal operations unit.

This analysis was performed using a PLEXOS run in which operational parameters are utilized and actual constraints are included. The model optimizes against the historical DA LMPs at the commercial pricing node of each seasonally operated unit, and assumes that LMP is unaffected by unit commit.

Figure 2 compares the modeled production costs during seasonal operations compared to modeled production costs from must commit and economic commitment. This figure also shows the modeled CO₂ emissions savings due to the seasonal operations plan relative to must run and economic commitment for King and Sherco 2 (or 1).

Xcel Energy performed what-if scenario modeling of production costs compared to historic DA LMP using the PLEXOS model. This analysis includes three scenarios: base, must run and economic. The base case models the actual commitment of the King and Sherco 2 (or 1) units during seasonal dispatch. During seasonal operations, MISO is allowed to access the seasonal operation units if MISO declares an emergency. No emergencies occurred during the seasonal operations timeframe, therefore King and Sherco 2 (or 1) are modeled as being in outage during the timeframe in which they were seasonally operated.

The must run and economic cases enforce the operating parameters used during the base case, but alter the commit status to create a what-if scenario. For the must run case, the seasonal dispatch units are forced online in the model during the seasonal operations timeframe. For the economic case, the model is free to commit and decommit the seasonal operations units, respecting the unit parameters included in the model. Finally the must run and economic cases are compared to the base case, as shown in Figure 2. The model results indicate that seasonal operations was successful from both an economic and environmental point of view for both King and Sherco.

King's base case (representing seasonal operations) compared favorably to the must run scenario, with \$9.9 million higher margin resulting from seasonal operations. The model also showed seasonal operations saved 2.4 billion pounds of carbon dioxide (CO₂) emissions over a must run scenario. The economic case for King resulted in a slightly less optimal margins compared to seasonal operations, with the model committing King during November 2021 for a total of 108 hours, during which the unit was profitable the first 24 hours of commitment, but operated at a loss overall over its minimum run time. The decreased profit for economic operations compared to seasonal operations at King was \$484,532. In addition, seasonal operations at King saved 95.6 million pounds CO₂ emissions compared to economic operations.

Sherco 1 and 2 seasonal operations also showed economic and environmental benefits compared to must run of the units. Sherco 1 and 2 base case (compared to must run) resulted in a combined \$6.6 million in additional margins, and savings of 950 million pounds of CO₂ emissions. In the economic case, the model did not commit Sherco 1 or 2 during its designated seasonal operations period resulting in no profit or CO₂ emissions change to the Base case.

Figure 2: Comparison of Econ and Must Run to Seasonal Operations

		MR Less BASE									ECON less BASE								
		Generation (MWh)	Fuel Cost (\$000)	O&M Cost (\$000)	Start Costs (\$000)	Total Costs (\$000)	Revenue (\$000)	Profit+/Loss- (\$000)	CO2 (000 lb)	run hours	Generation (MWh)	Fuel Cost (\$000)	O&M Cost (\$000)	Start Costs (\$000)	Total Costs (\$000)	Revenue (\$000)	Profit+/Loss- (\$000)	CO2 (000 lb)	run hours
King	Mar-21	239,540	4,387	567	211	5,166	4,429	(736)	521,260	552	-	-	-	-	-	-	-	-	-
	Apr-21	248,365	4,586	608	211	5,405	6,306	901	554,351	513	-	-	-	-	-	-	-	-	-
	May-21	277,965	5,322	8,674	-	13,996	7,001	(6,995)	620,418	744	-	-	-	-	-	-	-	-	-
	Sep-21	34,343	661	1,260	-	1,921	1,308	(613)	76,654	95	-	-	-	-	-	-	-	-	-
	Oct-21	345	7	13	167	186	15	(171)	770	1	-	-	-	-	-	-	-	-	-
	Nov-21	266,592	5,070	9,656	-	14,727	12,480	(2,247)	595,033	685	42,849	813	1,572	167	2,551	2,067	(485)	95,639	108
	Total	1,061,150	20,033	20,778	589	41,400	31,539	(9,862)	2,368,486	2,590	42,849	813	1,572	167	2,551	2,067	(485)	95,639	108
SHC1	Mar-21	21,140	451	15	-	466	473	7	50,250	48	-	-	-	-	-	-	-	-	-
	Apr-21	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
	May-21	76,180	1,750	3,032	-	4,781	1,906	(2,876)	181,080	293	-	-	-	-	-	-	-	-	-
	Sep-21	41,004	930	1,461	229	2,620	1,579	(1,042)	97,467	146	-	-	-	-	-	-	-	-	-
	Oct-21	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
	Nov-21	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Total	138,324	3,131	4,508	229	7,867	3,957	(3,910)	328,796	487	-	-	-	-	-	-	-	-	-	
SHC2	Mar-21	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
	Apr-21	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
	May-21	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
	Sep-21	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
	Nov-21	189,242	4,123	6,520	186	10,829	8,565	(2,264)	445,474	551	-	-	-	-	-	-	-	-	-
Total	263,898	5,727	9,157	186	15,071	12,343	(2,728)	621,215	751	-	-	-	-	-	-	-	-	-	

Figure 3 shows the actual operations of the coal units by quarter for 2021, including offline hours (outage or reserve shutdown), starts by type (MISO economic, MISO reliability, Company must run) and duration of each start by type.

Due to economic decommit or idling for seasonal operation, King was offline in reserve shutdown (RS) for 3,600 hours out of the 8,760 hours during 2021, or 41% of hours during 2021. King was only self-committed by the Company on two occasions during 2021. MISO economically committed King four times for economics, and zero times for reliability.

Similarly, Sherco 1 and Sherco 2 also experienced fewer reserve shutdown hours and several MISO economic starts. Sherco 1 had one reliability start by MISO and Sherco 2 had zero. Due to system conditions and contractual requirements, unique to Sherco plant, Sherco 1 and Sherco 2 were started for company needs six and two times, respectively, during 2021.

Figure 3: Operating Statistics by Quarter

Unit	Date	Run Hours			Offline Hours		Starts by Type			
		MISO ECON	MISO REL	COMP MR	RS	OUT	MISO ECON	MISO REL	COMP MR	TOTAL
SHC1	Q1	-	-	1,085	306	769	0	0	1	1
	Q2	-	-	790	1,115	279	0	0	3	3
	Q3	503	26	1,034	340	305	0	1	1	2
	Q4	48	-	2,067	-	93	0	0	1	1
	Total	551	26	4,976	1,761	1,446	0	1	6	7
SHC2	Q1	62	-	1,821	277	-	1	0	1	2
	Q2	232	56	1,171	19	706	1	0	1	2
	Q3	354	-	1,854	-	-	0	0	0	0
	Q4	466	-	191	1,222	329	2	0	0	2
	Total	1,114	56	5,037	1,518	1,035	4	0	2	6
KING	Q1	173	-	491	1,411	85	0	0	1	1
	Q2	273	47	273	1,384	207	1	0	0	1
	Q3	1,035	-	129	86	958	2	0	0	2
	Q4	488	-	185	719	816	1	0	1	2
	Total	1,969	47	1,078	3,600	2,066	4	0	2	6

2. Capital and O&M Costs

As discussed in the Unit Commitment Plan Petition, we did not expect to see any capital savings at Sherco 2 in 2021. Given its retirement date of 2023, minimal investments are planned for the unit. In addition, we expect to see significant capital savings at King in future years of seasonal operations.²

As a result of seasonal dispatch, King achieved the expected O&M savings of approximately \$3.7 million in 2021 and Sherco 2 achieved the expected O&M savings of approximately \$1.1 million compared to the operation of the plants during the seasonal periods.

3. Workforce Impacts

No employees were negatively impacted due to seasonal operations at King and Sherco 2. When possible, and in compliance applicable with union rules, employees were given the opportunity to travel to other power plant sites to help support daily and overhaul activities.

As we discussed in our April 1, 2020 supplement in Docket No. E002/M-19-809, plant managers have been engaging with employees regarding the future of our coal generators for several years. As part of those communications, we discussed the likelihood that coal plants would shut down before their expected retirement date

² See Table 6 of the December 20, 2019 Petition in Docket No. E002/M-19-809.

consistent with our recently approved integrated resource plan. We continue to communicate with employees to keep them informed.

CONCLUSION

We respectfully request that the Commission accept this filing in compliance with the November 13, 2019 ORDER ACCEPTING 2017-2018 ELECTRIC REPORTS AND SETTING ADDITIONAL REQUIREMENTS in Docket No. E999/AA-18-373, the February 7, 2019 ORDER ACCEPTING 2016-2017 REPORTS AND SETTING ADDITIONAL REQUIREMENTS in Docket Nos. E999/AA-17-492 and E999/AA-18-373, the January 11, 2021 ORDER EVALUATING SELF-COMMITMENT AND SELF-SCHEDULING REPORTS AND ESTABLISHING ADDITIONAL FILING REQUIREMENTS in Docket Nos. E999/CI-19-704 and E002/M-19-809, the December 1, 2021 ORDER ACCEPTING REPORTS AND SETTING ADDITIONAL REQUIREMENTS in Docket No. E999/CI-19-704, and the July 15, 2019 ORDER APPROVING PLAN AND REQUIRING FILING in Docket No. E002/M-19-809.

Dated: March 1, 2022

Northern States Power Company

Attachment A is being submitted as a live file.

Attachment B is being submitted as a live file.

Attachment C is being submitted as a live file.

Best Case/Worse Case Scenarios by Unit

	MR							ECON							ECON less MR										
	MWh	Gen Cost	Revenue	Profit (+) /		CO2 (000 lb)	run hours	MWh	Gen Cost	Revenue	Profit (+) /		Estimated MWP	P/L with Estimated		CO2 (000 lb)	run hours	MWh	Gen Cost	Revenue	Profit (+) /		P/L with Estimated MWP	CO2 (000 lb)	run hours
				Loss (-)	Loss (-)						Loss (-)	Loss (-)		Estimated MWP	Estimated MWP						Loss (-)	Loss (-)			
KING	Jan-21	356,119	7,440,798	7,901,421	460,623	794,856	744	-	-	-	-	-	-	-	-	-	-	(356,119)	(7,440,798)	(7,901,421)	(460,623)	(460,623)	(794,856)	(744)	
	Feb-21	336,005	6,994,000	24,404,708	17,410,708	749,963	672	255,166	5,451,971	22,582,626	17,130,655	88,420	17,219,074	569,529	503	(80,840)	(1,542,029)	(1,822,083)	(280,054)	(191,634)	(180,434)	(169)			
	Mar-21	255,919	5,634,622	4,936,637	(697,985)	571,210	600	-	-	-	-	-	-	-	-	-	-	(255,919)	(5,634,622)	(4,936,637)	697,985	697,985	(571,210)	(600)	
	Apr-21	248,365	5,404,711	6,305,909	901,199	554,351	513	-	-	-	-	-	-	-	-	-	-	(248,365)	(5,404,711)	(6,305,909)	(901,199)	(901,199)	(554,351)	(513)	
	May-21	277,965	13,996,118	7,000,913	(6,995,205)	620,418	744	-	-	-	-	-	-	-	-	-	-	(277,965)	(13,996,118)	(7,000,913)	6,995,205	6,995,205	(620,418)	(744)	
	Jun-21	352,643	7,684,832	13,489,521	5,804,689	787,098	720	281,396	6,194,856	11,614,146	5,419,289	-	5,419,289	628,076	561	(71,247)	(1,489,976)	(1,875,376)	(385,400)	(385,400)	(159,022)	(159)			
	Jul-21	303,255	7,083,629	11,875,016	4,791,387	676,864	614	262,361	5,786,268	10,567,672	4,781,403	-	4,781,403	585,589	518	(40,894)	(1,297,361)	(1,307,344)	(9,983)	(9,983)	(91,275)	(96)			
	Aug-21	221,096	12,351,667	8,519,784	(3,831,883)	493,485	600	17,105	1,116,191	911,714	(204,477)	264,942	60,465	38,178	41	(203,991)	(11,235,476)	(7,608,070)	3,627,406	3,892,348	(455,307)	(559)			
	Sep-21	35,033	2,164,984	1,330,212	(834,773)	78,194	97	-	-	-	-	-	-	-	-	-	-	(35,033)	(2,164,984)	(1,330,212)	834,773	834,773	(78,194)	(97)	
	Oct-21	345	186,149	15,125	(171,024)	770	1	-	-	-	-	-	-	-	-	-	-	(345)	(186,149)	(15,125)	171,024	171,024	(770)	(1)	
	Nov-21	278,667	15,105,242	13,114,506	(1,990,736)	621,985	720	42,849	2,551,388	2,066,856	(484,533)	-	(484,533)	95,639	108	(235,818)	(12,553,854)	(11,047,650)	1,506,203	1,506,203	(526,346)	(612)			
	Dec-21	331,069	7,144,363	12,803,895	5,659,532	738,945	670	289,964	6,436,951	11,134,725	4,697,774	-	4,697,774	647,199	572	(41,105)	(707,413)	(1,669,171)	(961,758)	(961,758)	(91,746)	(98)			
	Total	2,996,478	91,191,116	111,697,649	20,506,533	6,688,139	6,695	1,148,840	27,537,626	58,877,738	31,340,112	353,362	31,693,474	2,564,210	2,303	(1,847,639)	(63,653,490)	(52,819,911)	10,833,579	11,186,941	(4,123,929)	(4,392)			

	MR							ECON							ECON less MR										
	MWh	Gen Cost	Revenue	Profit (+) /		CO2 (000 lb)	run hours	MWh	Gen Cost	Revenue	Profit (+) /		Estimated MWP	P/L with Estimated		CO2 (000 lb)	run hours	MWh	Gen Cost	Revenue	Profit (+) /		P/L with Estimated MWP	CO2 (000 lb)	run hours
				Loss (-)	Loss (-)						Loss (-)	Loss (-)		Estimated MWP	Estimated MWP						Loss (-)	Loss (-)			
Sherco1	Jan-21	323,379	7,206,188	7,202,028	(4,159)	768,671	646	240,048	5,388,658	5,339,498	(49,159)	145,261	96,101	570,594	483	(83,331)	(1,817,530)	(1,862,530)	(45,000)	100,261	(198,077)	(163)			
	Feb-21	407,900	8,729,943	30,702,360	21,972,417	969,578	672	379,564	8,095,414	30,133,742	22,038,328	-	22,038,328	902,224	603	(28,336)	(634,530)	(568,619)	65,911	65,911	(67,355)	(69)			
	Mar-21	21,140	466,134	473,213	7,078	50,250	48	-	-	-	-	-	-	-	-	-	-	(21,140)	(466,134)	(473,213)	(7,078)	(7,078)	(50,250)	(48)	
	Apr-21	9,374	434,943	243,534	(191,408)	22,282	14	9,374	435,247	243,534	(191,712)	-	(191,712)	22,282	14	-	304	-	(304)	(304)	-	-			
	May-21	178,469	8,438,805	4,405,900	(4,032,905)	424,220	540	72,129	1,766,819	1,708,866	(57,954)	-	(57,954)	171,449	131	(106,340)	(6,671,985)	(2,697,035)	3,974,951	3,974,951	(252,770)	(409)			
	Jun-21	388,777	8,579,556	16,090,441	7,510,884	924,123	634	388,777	8,572,960	16,090,441	7,517,481	-	7,517,481	924,123	634	-	(6,596)	-	6,596	6,596	-	-			
	Jul-21	374,741	11,398,544	15,206,062	3,807,518	890,759	744	294,975	8,329,184	12,353,826	4,024,643	-	4,024,643	701,156	507	(79,766)	(3,069,360)	(2,852,235)	217,124	217,124	(189,604)	(237)			
	Aug-21	486,290	10,498,378	17,821,614	7,323,236	1,155,910	744	486,290	10,501,828	17,821,614	7,319,786	-	7,319,786	1,155,910	744	-	3,450	-	(3,450)	(3,450)	-	-			
	Sep-21	177,042	6,519,099	7,065,529	546,430	420,829	415	129,798	3,760,075	5,269,417	1,509,342	-	1,509,342	308,530	245	(47,244)	(2,759,025)	(1,796,112)	962,912	962,912	(112,299)	(170)			
	Oct-21	333,440	9,457,977	18,413,451	8,955,474	792,587	630	333,440	9,452,080	18,413,451	8,961,371	-	8,961,371	792,587	630	-	(5,897)	-	5,897	5,897	-	-			
	Nov-21	194,260	4,678,923	8,105,145	3,426,222	461,756	720	194,560	4,713,501	8,128,494	3,414,993	-	3,414,993	462,469	720	300	34,578	23,349	(11,229)	(11,229)	713	-			
	Dec-21	406,457	9,717,232	15,397,588	5,680,356	966,147	744	406,457	9,712,044	15,397,588	5,685,544	-	5,685,544	966,147	744	-	(5,189)	-	5,189	5,189	-	-			
	Total	3,301,267	86,125,722	141,126,865	55,001,143	7,847,112	6,551	2,935,411	70,727,809	130,900,471	60,172,662	145,261	60,317,923	6,977,471	5,455	(365,857)	(15,397,913)	(10,226,394)	5,171,519	5,316,780	(869,641)	(1,096)			

Best Case/Worse Case Scenarios by Unit

	MR							ECON							ECON less MR										
	MWh	Gen Cost	Revenue	Profit (+) /		CO2 (000 lb)	run hours	MWh	Gen Cost	Revenue	Profit (+) /		Estimated MWP	P/L with		CO2 (000 lb)	run hours	MWh	Gen Cost	Revenue	Profit (+) /		P/L with	CO2 (000 lb)	run hours
				Loss (-)	Loss (-)						Loss (-)	Estimated MWP		Estimated MWP	Loss (-)						Estimated MWP				
Sherco2	Jan-21	404,935	8,554,012	8,919,895	365,882	953,216	744	291,819	6,306,764	6,432,284	125,520	90,709	216,229	686,942	525	(113,116)	(2,247,248)	(2,487,610)	(240,362)	(149,653)	(266,274)	(219)			
	Feb-21	423,133	8,828,376	31,421,441	22,593,064	996,055	672	376,489	8,011,495	30,277,978	22,266,483	128,740	22,395,223	886,254	600	(46,645)	(816,882)	(1,143,462)	(326,581)	(197,841)	(109,801)	(72)			
	Mar-21	331,068	7,187,167	6,779,765	(407,403)	779,334	744	331,068	7,182,848	6,779,765	(403,084)	-	(403,084)	779,334	744	-	(4,319)	-	4,319	4,319	-	-			
	Apr-21	289,546	6,327,154	7,296,874	969,721	681,591	485	289,546	6,336,466	7,296,874	960,408	-	960,408	681,591	485	-	9,313	-	(9,313)	(9,313)	-	-			
	May-21	455,651	9,572,318	11,717,247	2,144,928	1,072,601	744	455,651	9,588,282	11,717,247	2,128,964	-	2,128,964	1,072,601	744	-	15,964	-	(15,964)	(15,964)	-	-			
	Jun-21	301,543	7,169,683	12,886,661	5,716,978	709,831	523	284,522	6,618,933	12,550,548	5,931,615	-	5,931,615	669,764	463	(17,021)	(550,750)	(336,113)	214,637	214,637	(40,067)	(60)			
	Jul-21	440,330	11,776,747	17,236,725	5,459,977	1,036,537	744	440,330	11,780,501	17,236,725	5,456,224	-	5,456,224	1,036,537	744	-	3,753	-	(3,753)	(3,753)	-	-			
	Aug-21	491,860	10,348,298	17,966,415	7,618,117	1,157,838	744	491,860	10,353,050	17,966,415	7,613,365	-	7,613,365	1,157,838	744	-	4,752	-	(4,752)	(4,752)	-	-			
	Sep-21	481,878	10,185,062	18,292,676	8,107,615	1,134,341	720	481,878	10,190,993	18,292,676	8,101,683	-	8,101,683	1,134,341	720	-	5,931	-	(5,931)	(5,931)	-	-			
	Oct-21	326,838	9,810,016	17,703,463	7,893,447	769,377	584	252,182	5,568,843	13,925,772	8,356,929	-	8,356,929	593,636	384	(74,656)	(4,241,173)	(3,777,691)	463,483	463,483	(175,740)	(200)			
	Nov-21	189,242	10,829,236	8,565,498	(2,263,738)	445,474	551	-	-	-	-	-	-	-	-	(189,242)	(10,829,236)	(8,565,498)	2,263,738	2,263,738	(445,474)	(551)			
	Dec-21	419,194	12,856,013	15,897,189	3,041,176	986,781	744	365,539	7,925,051	13,623,147	5,698,096	-	5,698,096	860,478	544	(53,655)	(4,930,962)	(2,274,042)	2,656,920	2,656,920	(126,304)	(200)			
Total	4,555,216	113,444,082	174,683,847	61,239,764	10,722,977	7,999	4,060,882	89,863,227	156,099,431	66,236,204	219,449	66,455,653	9,559,316	6,697	(494,334)	(23,580,856)	(18,584,416)	4,996,440	5,215,889	(1,163,661)	(1,302)				

	MR							ECON							ECON less MR										
	MWh	Gen Cost	Revenue	Profit (+) /		CO2 (000 lb)	run hours	MWh	Gen Cost	Revenue	Profit (+) /		Estimated MWP	P/L with		CO2 (000 lb)	run hours	MWh	Gen Cost	Revenue	Profit (+) /		P/L with	CO2 (000 lb)	run hours
				Loss (-)	Loss (-)						Loss (-)	Estimated MWP		Estimated MWP	Loss (-)						Estimated MWP				
Sherco3	Jan-21	218,133	5,023,597	4,838,983	(184,614)	480,329	744	218,133	5,028,872	4,838,983	(189,890)	-	(189,890)	480,329	744	-	5,276	-	(5,276)	(5,276)	-	-			
	Feb-21	276,010	6,203,009	22,655,397	16,452,388	607,773	672	276,010	6,209,644	22,655,397	16,445,753	-	16,445,753	607,773	672	-	6,635	-	(6,635)	(6,635)	-	-			
	Mar-21	217,684	5,022,807	4,286,796	(736,011)	479,341	744	137,221	3,147,682	2,962,751	(184,931)	-	(184,931)	302,161	443	(80,463)	(1,875,125)	(1,324,045)	551,080	551,080	(177,180)	(301)			
	Apr-21	254,728	5,794,156	6,457,767	663,611	560,912	720	79,394	2,049,606	1,920,298	(129,308)	225,263	95,955	174,824	236	(175,335)	(3,744,550)	(4,537,469)	(792,919)	(567,656)	(386,087)	(484)			
	May-21	217,753	5,182,468	5,721,306	538,839	479,492	606	-	-	-	-	-	-	-	-	(217,753)	(5,182,468)	(5,721,306)	(538,839)	(538,839)	(479,492)	(606)			
	Jun-21	301,139	6,778,361	12,474,368	5,696,007	663,108	720	84,913	2,496,119	4,739,401	2,243,282	-	2,243,282	186,978	186	(216,226)	(4,282,242)	(7,734,967)	(3,452,725)	(3,452,725)	(476,129)	(534)			
	Jul-21	306,362	7,508,625	12,245,462	4,736,837	674,609	744	72,178	1,918,134	2,508,096	589,962	-	589,962	158,935	167	(234,184)	(5,590,491)	(9,737,366)	(4,146,875)	(4,146,875)	(515,674)	(577)			
	Aug-21	332,899	7,535,733	12,547,131	5,011,398	733,044	744	239,330	5,897,452	9,337,787	3,440,335	-	3,440,335	527,005	520	(93,569)	(1,638,281)	(3,209,343)	(1,571,063)	(1,571,063)	(206,039)	(224)			
	Sep-21	193,264	4,387,529	7,215,798	2,828,269	425,567	408	193,264	4,392,728	7,215,798	2,823,070	-	2,823,070	425,567	408	-	5,199	-	(5,199)	(5,199)	-	-			
	Oct-21	221,259	6,062,975	11,098,980	5,036,005	487,212	585	191,562	4,708,766	9,294,707	4,585,941	-	4,585,941	421,819	576	(29,697)	(1,354,209)	(1,804,273)	(450,064)	(450,064)	(65,393)	(9)			
	Nov-21	174,240	4,113,761	7,180,617	3,066,856	383,676	720	150,766	3,983,439	6,568,691	2,585,252	26,202	2,611,454	331,987	623	(23,474)	(130,322)	(611,926)	(481,604)	(455,402)	(51,690)	(97)			
	Dec-21	230,291	5,466,449	8,931,199	3,464,750	507,101	589	172,651	4,464,384	6,475,919	2,011,535	-	2,011,535	380,177	381	(57,641)	(1,002,065)	(2,455,280)	(1,453,215)	(1,453,215)	(126,924)	(208)			
Total	2,943,762	69,079,469	115,653,803	46,574,334	6,482,164	7,996	1,815,421	44,296,827	78,517,828	34,221,000	251,465	34,472,465	3,997,556	4,956	(1,128,342)	(24,782,642)	(37,135,975)	(12,353,333)	(12,101,869)	(2,484,608)	(3,040)				

Unit Equivalent Forced Outage Rates (%) - 2021

	January	February	March	April	May	June	July	August	September	October	November	December	2021 Total
	[PROTECTED DATA BEGINS]												
King													
Monticello													
Prairie Island 1													
Prairie Island 2													
Sherco 1													
Sherco 2													
Sherco 3													

PROTECTED DATA ENDS]

CERTIFICATE OF SERVICE

I, Mustafa Adam, hereby certify that I have this day served copies of the foregoing document on the attached list of persons.

xx by depositing a true and correct copy thereof, properly enveloped with postage paid in the United States mail at Minneapolis, Minnesota

xx electronic filing

**DOCKET Nos. E999/CI-19-704
E002/M-19-809**

Dated this 1st day of March 2022

/s/

Mustafa Adam
Regulatory Administrator

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Alison C	Archer	aarcher@misoenergy.org	MISO	2985 Ames Crossing Rd Eagan, MN 55121	Electronic Service	No	OFF_SL_19-704_Official
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_19-704_Official
Brooke	Cooper	bcooper@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022191	Electronic Service	No	OFF_SL_19-704_Official
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_19-704_Official
Bruce	Gerhardson	bgerhardson@otpc.com	Otter Tail Power Company	PO Box 496 215 S Cascade St Fergus Falls, MN 565380496	Electronic Service	No	OFF_SL_19-704_Official
Allen	Gleckner	gleckner@fresh-energy.org	Fresh Energy	408 St. Peter Street Ste 350 Saint Paul, Minnesota 55102	Electronic Service	Yes	OFF_SL_19-704_Official
Kim	Havey	kim.havey@minneapolismn.gov	City of Minneapolis	350 South 5th Street, Suite 315M Minneapolis, MN 55415	Electronic Service	No	OFF_SL_19-704_Official
Adam	Heinen	aheinen@dakotaelectric.com	Dakota Electric Association	4300 220th St W Farmington, MN 55024	Electronic Service	No	OFF_SL_19-704_Official
Kristin	Henry	kristin.henry@sierraclub.org	Sierra Club	2101 Webster St Ste 1300 Oakland, CA 94612	Electronic Service	No	OFF_SL_19-704_Official
Holly	Lahd	holly.lahd@target.com	Target Corporation	33 South 6th St CC-28662 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-704_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Leann	Oehlerking Boes	lboes@mnpower.com	Minnesota Power	30 W Superior St Duluth, MN 55802	Electronic Service	No	OFF_SL_19-704_Official
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_19-704_Official
Isabel	Ricker	ricker@fresh-energy.org	Fresh Energy	408 Saint Peter Street Suite 220 Saint Paul, MN 55102	Electronic Service	Yes	OFF_SL_19-704_Official
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_19-704_Official
Shane	Stennes	stennes@umn.edu	University of Minnesota	319 15th Avenue SE Minneapolis, MN 55455	Electronic Service	No	OFF_SL_19-704_Official
Lynnette	Sweet	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_19-704_Official
Stuart	Tommerdahl	stommerdahl@otpc.com	Otter Tail Power Company	215 S Cascade St PO Box 496 Fergus Falls, MN 56537	Electronic Service	No	OFF_SL_19-704_Official
Brian	Tulloh	btulloh@misoenergy.org	MISO	2985 Ames Crossing Rd Eagan, MN 55121-2498	Electronic Service	No	OFF_SL_19-704_Official
Laurie	Williams	laurie.williams@sierraclub.org	Sierra Club	Environmental Law Program 1536 Wynkoop St Ste 200 Denver, CO 80202	Electronic Service	No	OFF_SL_19-704_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Alison C	Archer	aarcher@misoenergy.org	MISO	2985 Ames Crossing Rd Eagan, MN 55121	Electronic Service	No	OFF_SL_19-809_Official List
Mara	Ascheman	mara.k.ascheman@xcelenergy.com	Xcel Energy	414 Nicollet Mall Fl 5 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_19-809_Official List
Gail	Baranko	gail.baranko@xcelenergy.com	Xcel Energy	414 Nicollet Mall 7th Floor Minneapolis, MN 55401	Electronic Service	No	OFF_SL_19-809_Official List
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