

**State of Minnesota
Before the Public Utilities Commission**

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

In the Matter of Northern States Power
Company d/b/a Xcel Energy's Petition for
Approval of the Transmission Cost Recovery
Rider Revenue Requirements for 2021-2022, and
the Resulting Adjustment Factors by Customer
Class.

Docket No. E-002/M-21-814

Comments of the Citizens Utility Board of Minnesota

The Citizens Utility Board of Minnesota ("CUB") respectfully submits these comments in response to the Minnesota Public Utilities Commission's ("the Commission") February 7, 2022 Notice of Comment Period. Specifically, we provide comments with respect to scoping and procedures for Xcel's cost recovery request of its Advanced Grid Intelligence and Security ("AGIS")-related costs. CUB recommends that the Commission bifurcate cost recovery decisions related to AGIS and non-AGIS costs and refer Xcel's AGIS-related costs to the Office of Administrative Hearings for a contested case proceeding.

CUB especially appreciates the Guidance Document produced by Synapse Energy Economics, Inc. ("Synapse") for the Minnesota Department of Commerce ("the Department") and filed by the Department in the present docket.¹ We have found that Document to be very useful and generally support its conclusions and recommendations.

I. Procedural history

On November 1, 2019, Xcel Energy ("Xcel") presented its proposed investments in Advanced Metering Infrastructure ("AMI") and a Field Area Network ("FAN"), two core components of its AGIS initiative, in its 2019 Integrated Distribution Plan ("IDP," Docket No. 19-666) and requested certification of these and other investments.² Xcel's 2019 IDP was an extensive filing that included approximately 30 attachments, including Xcel's cost-benefit analysis of the AMI and FAN proposals and direct testimony from five witnesses.

¹ *In the Matter of Northern States Power Company d/b/a/ Xcel Energy's Petition for Approval of the Transmission Cost Recovery Rider Revenue Requirements for 2021 and 2022, Tracker True-up, and Revised Adjustment Factors*, Docket No. E002/M-21-814, Report from Synapse Energy Economics, Inc. on Review and Assessment of Grid Modernization Plans *in* Letter of the Minnesota Department of Commerce, Division of Energy Resources (Feb. 9, 2022) [hereinafter "DOC DER February 9, 2022 Letter and Synapse Report"].

² *In the Matter of Xcel Energy's Integrated Distribution Plan and Advanced Grid Intelligence and Security Certification Request*, Docket No. E002/M-19-666, Xcel Energy Initial Distribution Plan (Nov. 1, 2019).

In the comment period that followed, comments were filed by ten parties (including CUB) and presented a wide range of analyses and recommendations regarding the proposed investments, Xcel's cost-benefit analysis, the legal question of certification, the appropriateness of rider recovery, critical consumer protections, and other topics. Multiple parties (including CUB) engaged outside experts to assist with the complex analysis.

The Commission met to consider Xcel's IDP on May 29, 2020 and issued its written order on July 23, 2020. In that order, the Commission certified Xcel's AMI and FAN proposals and noted:

[C]ertification of the AMI and FAN projects in this order is made with the recognition that future cost recovery will be based upon a utility accomplishing Commission-approved metrics and performance evaluations for the certified projects. Any future proposals for cost recovery of investments certified in this order must be accompanied by a proposal for specific metrics and evaluation methods, and a detailed plan describing how the company will maximize the benefits of the investments for ratepayers.³

The order requested that the Department conduct a stakeholder process and "file a report by November 1, 2020, including recommendations on specific metrics, detailed methods for evaluating performance, and consumer protections or other conditions, including cost caps, that should be applied to the certified projects."⁴

Additionally, the order stated:

The Commission clarifies in this order that certification does not constitute a pre-judgment of whether costs will be recovered through riders or base rates. Certification simply permits a utility to request rider recovery in the future, which the Commission may approve or deny based on the facts available at that time.⁵

Further, the order required Xcel to file "preferred procedural paths forward" for cost recovery of the certified investments and established that the Commission would conduct a comment and reply process and make a "procedural and scoping decision prior to the consideration of a rider recovery determination."⁶

Following that order, multiple additional dockets were initiated. In Docket No. 20-627, on August 21, 2020, the Department began a "written, comment-based stakeholder process" on the metrics, performance evaluation methods, and consumer protection conditions to be applied to Xcel's AMI

³ *In the Matter of Xcel Energy's Integrated Distribution Plan and Advanced Grid Intelligence and Security Certification Request*, Docket No. E002/M-19-666, Order Accepting Integrated Distribution Plan, Modifying Reporting Requirements, and Certifying Certain Grid Modernization Projects 12 (July 23, 2020) [hereinafter "July 23 Commission Order in Docket No. 19-666"].

⁴ *Id.* at 16, Order Point 9.

⁵ *Id.* at 12, *see also id.* at 17, Order Point 11.

⁶ *Id.* at 17, Order Point 13.

and FAN projects.⁷ Six parties (including CUB) filed comments, and the Department filed its report on December 1, 2020.⁸

On August 28, 2020, Xcel filed its preferred procedural paths for cost recovery of its AGIS projects.⁹ The Commission initiated a separate docket (20-680) and requested comments in a September 23, 2020 notice. Four parties (including CUB) submitted comments, in addition to Xcel. To CUB's knowledge, this matter has not yet been taken up by the Commission.

Also in 2020, Xcel proposed multiple projects in response to a Commission request for utility projects that could assist in Minnesota's recovery from the COVID-19 pandemic, and Xcel filed a general rate case and a rate case stay-out proposal.¹⁰ These dockets related to, or had the potential to interact with, Xcel's AGIS proposals and cost recovery, evidenced by the fact that party filings and Commission orders from late 2020 sometimes referenced as many as eight dockets.¹¹

II. Discussion

CUB agrees with the Department that the scale of the proposed investments "demand that extraordinary consideration, evaluation, and opportunity for careful and thorough review of proposed grid modernization investments be provided in order to protect the interests of utility ratepayers and promote the public interest."¹² Xcel's AMI and FAN projects are large and complex investments. Xcel estimates that, together, the projects will cost \$563.7 million¹³ and have a monthly cost of \$2.87 for

⁷ *In the Matter of the Department Stakeholder Process Informing the Report on the Metrics, Performance Evaluation Methods, and Consumer Protection Conditions to be Applied to Xcel Energy's Advanced Metering Infrastructure and Field Area Network Projects Certified in Docket No. E002/M-19-666*, Docket No. E999/DI-20-627, Notice of Solicitation of Stakeholder Input and Comments 1 (Aug. 21, 2020).

⁸ *See In the Matter of the Department Stakeholder Process Informing the Report on the Metrics, Performance Evaluation Methods, and Consumer Protection Conditions to be Applied to Xcel Energy's Advanced Metering Infrastructure and Field Area Network Projects Certified in Docket No. E002/M-19-666*, Dockets Nos. E002/M-19-666; E999/DI-20-627, Report of the Minnesota Commerce Department, Division of Energy Resources (Dec. 1, 2020).

⁹ *In the Matter of Northern States Power Company d/b/a Xcel Energy for Approval of the Transmission Cost Recovery Rider Revenue Requirements for 2021 and Revised Adjustment Factors*, Docket No. E002/M-20-680, Xcel Energy Procedural Paths Forward Compliance Filing (Aug. 28, 2020).

¹⁰ *See* Dockets Nos. E,G999/CI-20-492; E,G002/M-20-716, E002/M-20-743; E002/GR-20-723, E002/M-20-743, and multiple subsequent dockets.

¹¹ On October 14, 2020, the Xcel Large Industrials filed a motion to consolidate these and other dockets into Xcel's 2020 rate case; that motion was denied and Xcel's rate case stay-out was approved. *See In the Matter of Xcel Energy's Integrated Distribution Plan and Advanced Grid Intelligence and Security Certification Request*, Docket No. E002/M-19-666, XLI Motion for Consolidation and Initial Comments (Oct. 14, 2020); *In the Matter of Xcel Energy's Integrated Distribution Plan and Advanced Grid Intelligence and Security Certification Request*, Docket No. E002/M-19-666, Order Denying Request to Consolidate Dockets (Jan. 26, 2021).

¹² DOC DER February 9, 2022 Letter and Synapse Report, at 5-6.

¹³ *In the Matter of Northern States Power Company d/b/a Xcel Energy's Petition for Approval of the Transmission Cost Recovery Rider Revenue Requirements for 2021-2022, and the Resulting Adjustment Factors by Customer Class*, Docket No. E002/M-21-814, Xcel Initial Petition, Attach. 4, p. 55 (Nov. 24, 2021).

the average residential customer in 2024.¹⁴ This represents nearly 4 percent of the average bill today for a residential customer with overhead electric service.¹⁵

CUB agrees with Xcel that these investments have the potential to provide benefits that outweigh their substantial costs. However, as we previously noted, “experience has shown that these investments are inherently complex and can be subject to cost overruns. In addition, the customer-facing value proposition identified at the outset of a project is not often realized upon implementation.”¹⁶

Clear processes and standards are critical to evaluating such proposals. The functionalities, costs, and benefits of proposed investments, and their costs compared with alternatives, must be established prior to their approval, and metrics must be established in order to later evaluate the degree to which any approved investments delivered promised benefits for ratepayers.

Xcel’s AMI and FAN investments have traveled a complex and often unclear regulatory path to date. We concur with Synapse in its report for the Department, that “[u]sing multiple regulatory processes and dockets to review grid modernization investments creates regulatory uncertainty and ambiguity that can lead to inefficient and less effective oversight by the Commission and stakeholders.”¹⁷ It has been unclear to CUB precisely which questions would be taken up by the Commission at each stage of this process, and we have, at times, spent substantial time on analysis that were apparently not helpful to the Commission at the times it was presented. For example, we and other parties submitted recommendations on procedure in Dockets 19-666 and 20-680, and we now revisit some of the same questions in the present proceeding. Further, full participation in these proceedings requires expertise that CUB—and, we believe, most other parties—does not have in house. We have engaged outside experts when possible, but that is resource intensive and is particularly difficult when the timing and scope of proceedings are unclear.

III. Recommendations

CUB has previously argued, and we continue to believe, that a contested case is most appropriate for the consideration of Xcel’s AMI and FAN projects.¹⁸

Xcel has argued that “a contested case is not warranted” and that “the Company is unaware of any applicable statute or rule providing a right to a contested case.”¹⁹ However, by its plain language, Minn.

¹⁴ *Id.* at Attach. 4, p. 57.

¹⁵ See *In the Matter of the Application of Northern States Power Company for Authority to Increase Rates for Electric Service in the State of Minnesota*, Docket No. E002/GR-21-630, Xcel Interim Rates Compliance Filing, Attach. D (Jan. 3, 2022) (reporting that the average residential bill for a customer with overhead line service is \$77.57 per month).

¹⁶ *In the Matter of Xcel Energy’s Integrated Distribution Plan and Advanced Grid Intelligence and Security Certification Request*, Docket No. E002/M-19-666, Strategen Report for CUB: Review and Recommendations for the Xcel Energy Integrated Distribution Plan 2 (Mar. 17, 2020) [hereinafter “Strategen Report”].

¹⁷ DOC DER February 9, 2022 Letter and Synapse Report, at ii.

¹⁸ See *In the Matter of Northern States Power Company for Approval of the Transmission Cost Recovery Rider Revenue Requirements for 2021 and Revised Adjustment Factors*, Docket No. E002/M-20-680, CUB Initial Comments 1 (Oct. 16, 2020).

¹⁹ *In the Matter of Northern States Power Company for Approval of the Transmission Cost Recovery Rider Revenue Requirements for 2021 and Revised Adjustment Factors*, Docket No. E002/M-20-680, Xcel Reply Comments 1 (Oct. 30, 2020) at 5.

Rule 7829.1000 does not state that a contested case referral must be predicated on a statute or rule providing a right to a contested case hearing; it states that the Commission “*shall*” refer a matter to a contested case hearing if either of the following two conditions are present: (1) “a proceeding involves contested material facts and there is a right to a hearing under statute or rule” or (2) “the commission finds that all significant issues have not been resolved to its satisfaction.” While we believe that the Commission can find that both are true in this case, the Commission need only make one of these findings.

As CUB has stated:

[S]ignificant issues remain unresolved in the record. Cost recovery for the AGIS investments requires complex and detailed consideration of a large number of additional questions, many of which are quite technical in nature and regard types of utility technology and opportunities that have not previously been considered by Minnesota regulators or parties. [T]his investment will have a substantial customer impact. Such a complex and significant topic merits, if anything, greater consideration than typical.²⁰ [...]

This is a complex and new area of investment with substantial risk that costs will run over-budget or that expected benefits will fail to be realized.²¹

The scope of the cost recovery proceeding will necessarily be extensive to “provide a full understanding of the investments, their functionalities, and their costs, and how these compare to alternatives, as well as the mechanisms to keep customer costs low,” including a thorough understanding of “the discrete costs and values of discrete, optional functionalities included in the meters, such as their distributed intelligence capabilities,” and when and how functionalities will be used by Xcel and made available to third parties.²²

A right to a hearing is provided under statute. Minn. Stat. 216A.03, Subd. 7 states:

A filing with the commission may be deemed approved by the commission after 60 days of filing, unless the commission, a commissioner, or any other person requests the filing be set aside for action by the commission. The commission may designate, by standing order, categories or types of filings that are eligible for approval under this subdivision. [...] [P]etitions to increase rates are not eligible for designation.²³

In this matter, CUB is a “person request[ing] the filing be set aside for action by the commission.” Moreover, Minn. Stat. 216.16 provides for a hearing for matters not deemed approved: “If the matter be not adjusted to the satisfaction of the commission, it shall set a time and place of a hearing, and give at least ten days’ notice thereof to each party.”

²⁰ *In the Matter of Northern States Power Company for Approval of the Transmission Cost Recovery Rider Revenue Requirements for 2021 and Revised Adjustment Factors*, Docket No. E002/M-20-680, CUB Initial Comments 1 (Oct. 16, 2020).

²¹ *Id.* at 2.

²² *Id.* at 2-3.

²³ Minn. Stat. 216A.03, Subd. 7

Finally, CUB believes that the upcoming comment period regarding Xcel's Transmission Cost Recovery ("TCR") petition in this docket should not examine Xcel's AMI and FAN proposals. The Commission's July 23, 2020 Order in Docket No. E002/M-19-666 was clear in its statement that "[t]he Commission will make a procedural and scoping decision prior to the consideration of a rider recovery determination."²⁴ CUB continues to have concerns about the use of rider recovery for these investments. As we detailed in our comments in Xcel's 2019 IDP, the use of riders undermines a multiyear rate plan's purpose to provide a cost control incentive and may obscure the true financial impact to customers, diminish the transparent accounting of distribution system costs in rates, and lead to double recovery – all of which are particularly important in the context of a potential bill increase of nearly 4% for an average customer.²⁵

As a side note, CUB wishes to share with the Commission that we are unlikely to be able to participate in a contested case, or in a detailed examination of Xcel's AMI and FAN proposals through any procedure. As a small nonprofit organization, we do not have the resources to engage the necessary experts at this time. We do not believe this affects the Commission's decision in any way but wish to share our position in the interest of full transparency.

IV. Conclusion

For the reasons described above, CUB respectfully recommends:

1. The Commission bifurcate cost recovery decisions related to AGIS and non-AGIS costs.
2. The Commission refer Xcel's AGIS-related costs to the Office of Administrative Hearings for a contested case examining the proposed investments and the procedure for cost recovery.

Thank you for your consideration of our comments in this matter.

Respectfully submitted,

March 30, 2022

/s/ Annie Levenson-Falk

Annie Levenson-Falk

Executive Director

Citizens Utility Board of Minnesota

332 Minnesota St., Suite W1360

St. Paul, MN 55101

651-300-4701, ext. 1

annielf@cubminnesota.org

²⁴ July 23 Commission Order in Docket No. 19-666, at 17, Order Point 13.

²⁵ See generally *In the Matter of Xcel Energy's Integrated Distribution Plan and Advanced Grid Intelligence and Security Certification Request*, Docket No. E002/M-19-666, CUB Initial Comments (Mar. 17, 2020); Strategen Report.

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Michael	Allen	michael.allen@allenergysolar.com	All Energy Solar	721 W 26th st Suite 211 Minneapolis, Minnesota 55405	Electronic Service	No	OFF_SL_21-814_M-21-814
David	Amster Olzweski	david@mysunshare.com	SunShare, LLC	1151 Bannock St Denver, CO 80204-8020	Electronic Service	No	OFF_SL_21-814_M-21-814
Ellen	Anderson	ellena@umn.edu	325 Learning and Environmental Sciences	1954 Buford Ave Saint Paul, MN 55108	Electronic Service	No	OFF_SL_21-814_M-21-814
Alison C	Archer	aarcher@misoenergy.org	MISO	2985 Ames Crossing Rd Eagan, MN 55121	Electronic Service	No	OFF_SL_21-814_M-21-814
Mara	Ascheman	mara.k.ascheman@xcelenergy.com	Xcel Energy	414 Nicollet Mall Fl 5 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_21-814_M-21-814
Donna	Attanasio	dattanasio@law.gwu.edu	George Washington University	2000 H Street NW Washington, DC 20052	Electronic Service	No	OFF_SL_21-814_M-21-814
John	Bailey	bailey@ilsr.org	Institute For Local Self-Reliance	1313 5th St SE Ste 303 Minneapolis, MN 55414	Electronic Service	No	OFF_SL_21-814_M-21-814
Mark	Bakk	mbakk@lcp.coop	Lake Country Power	26039 Bear Ridge Drive Cohasset, MN 55721	Electronic Service	No	OFF_SL_21-814_M-21-814
Gail	Baranko	gail.baranko@xcelenergy.com	Xcel Energy	414 Nicollet Mall 7th Floor Minneapolis, MN 55401	Electronic Service	No	OFF_SL_21-814_M-21-814
Jessica L	Bayles	Jessica.Bayles@stoel.com	Stoel Rives LLP	1150 18th St NW Ste 325 Washington, DC 20036	Electronic Service	No	OFF_SL_21-814_M-21-814

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
James J.	Bertrand	james.bertrand@stinson.com	STINSON LLP	50 S 6th St Ste 2600 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-814_M-21-814
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	OFF_SL_21-814_M-21-814
William	Black	bblack@mmua.org	MMUA	Suite 200 3131 Fernbrook Lane North Plymouth, MN 55447	Electronic Service	No	OFF_SL_21-814_M-21-814
Kenneth	Bradley	kbradley1965@gmail.com		2837 Emerson Ave S Apt CW112 Minneapolis, MN 55408	Electronic Service	No	OFF_SL_21-814_M-21-814
Elizabeth	Brama	ebrama@taftlaw.com	Taft Stettinius & Hollister LLP	2200 IDS Center 80 South 8th Street Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-814_M-21-814
Jon	Brekke	jbrekke@grenergy.com	Great River Energy	12300 Elm Creek Boulevard Maple Grove, MN 553694718	Electronic Service	No	OFF_SL_21-814_M-21-814
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_21-814_M-21-814
Mark B.	Bring	mbring@otpc.com	Otter Tail Power Company	215 South Cascade Street PO Box 496 Fergus Falls, MN 565380496	Electronic Service	No	OFF_SL_21-814_M-21-814
Christina	Brusven	cbrusven@fredlaw.com	Fredrikson Byron	200 S 6th St Ste 4000 Minneapolis, MN 554021425	Electronic Service	No	OFF_SL_21-814_M-21-814

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Jason	Burwen	jburwen@cleanpower.org	Energy Storage Association	1155 15th St NW, Ste 500 Washington, DC 20005	Electronic Service	No	OFF_SL_21-814_M-21-814
LORI	CLOBES	lclobes@mienergy.coop	MiEnergy Cooperative	31110 COOPERATIVE WAY PO BOX 626 RUSHFORD, MN 55971	Electronic Service	No	OFF_SL_21-814_M-21-814
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_21-814_M-21-814
Douglas M.	Carnival	dmc@mcgrannshea.com	McGrann Shea Carnival Straughn & Lamb	N/A	Electronic Service	No	OFF_SL_21-814_M-21-814
Ray	Choquette	rchoquette@agp.com	Ag Processing Inc.	12700 West Dodge Road PO Box 2047 Omaha, NE 68103-2047	Electronic Service	No	OFF_SL_21-814_M-21-814
John	Coffman	john@johncoffman.net	AARP	871 Tuxedo Blvd. St. Louis, MO 63119-2044	Electronic Service	No	OFF_SL_21-814_M-21-814
Kenneth A.	Colburn	kcolburn@symbioticstrategies.com	Symbiotic Strategies, LLC	26 Winton Road Meredith, NH 32535413	Electronic Service	No	OFF_SL_21-814_M-21-814
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-814_M-21-814
Riley	Conlin	riley.conlin@stoel.com	Stoel Rives LLP	33 S. 6th Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-814_M-21-814
Brooke	Cooper	bcooper@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022191	Electronic Service	No	OFF_SL_21-814_M-21-814

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
George	Crocker	gwillc@nawo.org	North American Water Office	PO Box 174 Lake Elmo, MN 55042	Electronic Service	No	OFF_SL_21-814_M-21-814
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_21-814_M-21-814
James	Denniston	james.r.denniston@xcelenergy.com	Xcel Energy Services, Inc.	414 Nicollet Mall, 401-8 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_21-814_M-21-814
Curt	Dieren	curt.dieren@dgr.com	L&O Power Cooperative	1302 S Union St Rock Rapids, IA 51246	Electronic Service	No	OFF_SL_21-814_M-21-814
Carlton	Doyle Fontaine	carlton.doyle.fontaine@senate.mn	MN Senate	75 Rev Dr Martin Luther King Jr Blvd Room G-17 St Paul, MN 55155	Electronic Service	No	OFF_SL_21-814_M-21-814
Brian	Draxten	bhdraxten@otpc.com	Otter Tail Power Company	P.O. Box 496 215 South Cascade Street Fergus Falls, MN 565380498	Electronic Service	No	OFF_SL_21-814_M-21-814
Brian	Edstrom	briane@cubminnesota.org	Citizens Utility Board of Minnesota	332 Minnesota St Ste W1360 Saint Paul, MN 55101	Electronic Service	No	OFF_SL_21-814_M-21-814
Kristen	Eide Tollefson	healingsystems69@gmail.com	R-CURE	28477 N Lake Ave Frontenac, MN 55026-1044	Electronic Service	No	OFF_SL_21-814_M-21-814
Rebecca	Eilers	rebecca.d.eilers@xcelenergy.com	Xcel Energy	414 Nicollet Mall - 401 7th Floor Minneapolis, MN 55401	Electronic Service	No	OFF_SL_21-814_M-21-814

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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	OFF_SL_21-814_M-21-814
Betsy	Engelking	betsy@nationalgridrenewables.com	Geronimo Energy, LLC	8400 Normandale Lake Blvd Ste 1200 Bloomington, MN 55437	Electronic Service	No	OFF_SL_21-814_M-21-814
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_21-814_M-21-814
James C.	Erickson	jericksonkbc@gmail.com	Kelly Bay Consulting	17 Quechee St Superior, WI 54880-4421	Electronic Service	No	OFF_SL_21-814_M-21-814
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_21-814_M-21-814
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_21-814_M-21-814
Lucas	Franco	lfranco@liunagroc.com	LIUNA	81 Little Canada Rd E Little Canada, MN 55117	Electronic Service	No	OFF_SL_21-814_M-21-814
Nathan	Franzen	nathan@nationalgridrenewables.com	Geronimo Energy, LLC	8400 Normandale Lake Blvd Ste 1200 Bloomington, MN 55437	Electronic Service	No	OFF_SL_21-814_M-21-814
Hal	Galvin	halgalvin@comcast.net	Provectus Energy Development llc	1936 Kenwood Parkway Minneapolis, MN 55405	Electronic Service	No	OFF_SL_21-814_M-21-814

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Edward	Garvey	edward.garvey@AESLconsulting.com	AESL Consulting	32 Lawton St Saint Paul, MN 55102-2617	Electronic Service	No	OFF_SL_21-814_M-21-814
Edward	Garvey	garveyed@aol.com	Residence	32 Lawton St Saint Paul, MN 55102	Electronic Service	No	OFF_SL_21-814_M-21-814
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_21-814_M-21-814
Allen	Gleckner	gleckner@fresh-energy.org	Fresh Energy	408 St. Peter Street Ste 350 Saint Paul, Minnesota 55102	Electronic Service	No	OFF_SL_21-814_M-21-814
Jenny	Glumack	jenny@mrea.org	Minnesota Rural Electric Association	11640 73rd Ave N Maple Grove, MN 55369	Electronic Service	No	OFF_SL_21-814_M-21-814
Timothy	Gulden	timothy.gulden@yahoo.com	Winona Renewable Energy, LLC	1449 Ridgewood Dr Winona, MN 55987	Electronic Service	No	OFF_SL_21-814_M-21-814
Tony	Hainault	anthony.hainault@co.hennepin.mn.us	Hennepin County DES	701 4th Ave S Ste 700 Minneapolis, MN 55415-1842	Electronic Service	No	OFF_SL_21-814_M-21-814
Shubha	Harris	Shubha.M.Harris@xcelenergy.com	Xcel Energy	414 Nicollet Mall, 401 - FL 8 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_21-814_M-21-814
Kim	Havey	kim.havey@minneapolismn.gov	City of Minneapolis	350 South 5th Street, Suite 315M Minneapolis, MN 55415	Electronic Service	No	OFF_SL_21-814_M-21-814
Todd	Headlee	theadlee@dvgridsolutions.com	Dominion Voltage, Inc.	701 E. Cary Street Richmond, VA 23219	Electronic Service	No	OFF_SL_21-814_M-21-814

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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	OFF_SL_21-814_M-21-814
Adam	Heinen	aheinen@dakotaelectric.com	Dakota Electric Association	4300 220th St W Farmington, MN 55024	Electronic Service	No	OFF_SL_21-814_M-21-814
Jared	Hendricks	jared.hendricks@owatonnautilities.com	Owatonna Municipal Public Utilities	PO Box 800 208 S Walnut Ave Owatonna, MN 55060-2940	Electronic Service	No	OFF_SL_21-814_M-21-814
Annete	Henkel	mui@mnuilityinvestors.org	Minnesota Utility Investors	413 Wacouta Street #230 St. Paul, MN 55101	Electronic Service	No	OFF_SL_21-814_M-21-814
Lynn	Hinkle	lynnh@ips-solar.com	IPS Solar	2670 Patton Rd Roseville, MN 55113	Electronic Service	No	OFF_SL_21-814_M-21-814
Joe	Hoffman	ja.hoffman@smmpa.org	SMMPA	500 First Ave SW Rochester, MN 55902-3303	Electronic Service	No	OFF_SL_21-814_M-21-814
Michael	Hoppe	lu23@ibew23.org	Local Union 23, I.B.E.W.	445 Etna Street Ste. 61 St. Paul, MN 55106	Electronic Service	No	OFF_SL_21-814_M-21-814
Jan	Hubbard	jan.hubbard@comcast.net		7730 Mississippi Lane Brooklyn Park, MN 55444	Electronic Service	No	OFF_SL_21-814_M-21-814
Geoffrey	Inge	ginge@regintl.com	Regulatory Intelligence LLC	PO Box 270636 Superior, CO 80027-9998	Electronic Service	No	OFF_SL_21-814_M-21-814
Ralph	Jacobson	ralphj@ips-solar.com		2126 Roblyn Avenue Saint Paul, Minnesota 55104	Electronic Service	No	OFF_SL_21-814_M-21-814

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Casey	Jacobson	cjacobson@bepc.com	Basin Electric Power Cooperative	1717 East Interstate Avenue Bismarck, ND 58501	Electronic Service	No	OFF_SL_21-814_M-21-814
John S.	Jaffray	jjaffray@jirpower.com	JJR Power	350 Highway 7 Suite 236 Excelsior, MN 55331	Electronic Service	No	OFF_SL_21-814_M-21-814
Alan	Jenkins	aj@jenkinsatlaw.com	Jenkins at Law	2950 Yellowtail Ave. Marathon, FL 33050	Electronic Service	No	OFF_SL_21-814_M-21-814
Richard	Johnson	Rick.Johnson@lawmoss.com	Moss & Barnett	150 S. 5th Street Suite 1200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-814_M-21-814
Sarah	Johnson Phillips	sarah.phillips@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-814_M-21-814
Nate	Jones	njones@hcpd.com	Heartland Consumers Power	PO Box 248 Madison, SD 57042	Electronic Service	No	OFF_SL_21-814_M-21-814
Michael	Kampmeyer	mkampmeyer@a-e-group.com	AEG Group, LLC	260 Salem Church Road Sunfish Lake, Minnesota 55118	Electronic Service	No	OFF_SL_21-814_M-21-814
Nick	Kaneski	nick.kaneski@enbridge.com	Enbridge Energy Company, Inc.	11 East Superior St Ste 125 Duluth, MN 55802	Electronic Service	No	OFF_SL_21-814_M-21-814
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_21-814_M-21-814

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Thomas	Koehler	TGK@IBEW160.org	Local Union #160, IBEW	2909 Anthony Ln St Anthony Village, MN 55418-3238	Electronic Service	No	OFF_SL_21-814_M-21-814
Chris	Kopel	chrisk@CMPASgroup.org	Central Minnesota Municipal Power Agency	459 S Grove St Blue Earth, MN 56013-2629	Electronic Service	No	OFF_SL_21-814_M-21-814
Brian	Krambeer	bkrambeer@mienergy.coop	MiEnergy Cooperative	PO Box 626 31110 Cooperative Way Rushford, MN 55971	Electronic Service	No	OFF_SL_21-814_M-21-814
Michael	Krause	michaelkrause61@yahoo.com	Kandiyo Consulting, LLC	433 S 7th Street Suite 2025 Minneapolis, Minnesota 55415	Electronic Service	No	OFF_SL_21-814_M-21-814
Michael	Krikava	mkrikava@taftlaw.com	Taft Stettinius & Hollister LLP	2200 IDS Center 80 S 8th St Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-814_M-21-814
Matthew	Lacey	Mlacey@greenergy.com	Great River Energy	12300 Elm Creek Boulevard Maple Grove, MN 553694718	Electronic Service	No	OFF_SL_21-814_M-21-814
Carmel	Laney	carmel.laney@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-814_M-21-814
Peder	Larson	plarson@larkinhoffman.com	Larkin Hoffman Daly & Lindgren, Ltd.	8300 Norman Center Drive Suite 1000 Bloomington, MN 55437	Electronic Service	No	OFF_SL_21-814_M-21-814
James D.	Larson	james.larson@avantenergy.com	Avant Energy Services	220 S 6th St Ste 1300 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-814_M-21-814
Dean	Leischow	dean@sunrisenrg.com	Sunrise Energy Ventures	315 Manitoba Ave Ste 200 Wayzata, MN 55391	Electronic Service	No	OFF_SL_21-814_M-21-814

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Annie	Levenson Falk	annief@cupminnesota.org	Citizens Utility Board of Minnesota	332 Minnesota Street, Suite W1360 St. Paul, MN 55101	Electronic Service	No	OFF_SL_21-814_M-21-814
Ryan	Long	ryan.j.long@xcelenergy.com	Xcel Energy	414 Nicollet Mall 401 8th Floor Minneapolis, MN 55401	Electronic Service	No	OFF_SL_21-814_M-21-814
Susan	Ludwig	sludwig@mnpower.com	Minnesota Power	30 West Superior Street Duluth, MN 55802	Electronic Service	No	OFF_SL_21-814_M-21-814
Kavita	Maini	kmairi@wi.rr.com	KM Energy Consulting, LLC	961 N Lost Woods Rd Oconomowoc, WI 53066	Electronic Service	No	OFF_SL_21-814_M-21-814
Pam	Marshall	pam@energycents.org	Energy CENTS Coalition	823 7th St E St. Paul, MN 55106	Electronic Service	No	OFF_SL_21-814_M-21-814
Mary	Martinka	mary.a.martinka@xcelenergy.com	Xcel Energy Inc	414 Nicollet Mall 7th Floor Minneapolis, MN 55401	Electronic Service	No	OFF_SL_21-814_M-21-814
Samuel	Mason	smason@beltramelectric.com	Beltrami Electric Cooperative, Inc.	4111 Technology Dr. NW PO Box 488 Bemidji, MN 56619-0488	Electronic Service	No	OFF_SL_21-814_M-21-814
Gregg	Mast	gmast@cleanenergyeconomy.org	Clean Energy Economy Minnesota	4808 10th Avenue S Minneapolis, MN 55417	Electronic Service	No	OFF_SL_21-814_M-21-814
Dave	McNary	David.McNary@hennepin.us	Hennepin County DES	701 Fourth Ave S Ste 700 Minneapolis, MN 55415-1842	Electronic Service	No	OFF_SL_21-814_M-21-814
Thomas	Melone	Thomas.Melone@AllcoUS.com	Minnesota Go Solar LLC	222 South 9th Street Suite 1600 Minneapolis, Minnesota 55120	Electronic Service	No	OFF_SL_21-814_M-21-814

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Brian	Meloy	brian.meloy@stinson.com	STINSON LLP	50 S 6th St Ste 2600 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-814_M-21-814
Joseph	Meyer	joseph.meyer@ag.state.mn.us	Office of the Attorney General-RUD	Bremer Tower, Suite 1400 445 Minnesota Street St Paul, MN 55101-2131	Electronic Service	No	OFF_SL_21-814_M-21-814
Stacy	Miller	stacy.miller@minneapolismn.gov	City of Minneapolis	350 S. 5th Street Room M 301 Minneapolis, MN 55415	Electronic Service	No	OFF_SL_21-814_M-21-814
David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022093	Electronic Service	No	OFF_SL_21-814_M-21-814
Dalene	Monsebroten	dalene.monsebroten@nmpagency.com	Northern Municipal Power Agency	123 2nd St W Thief River Falls, MN 56701	Electronic Service	No	OFF_SL_21-814_M-21-814
Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP	33 South Sixth St Ste 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-814_M-21-814
Carl	Nelson	cnelson@mncee.org	Center for Energy and Environment	212 3rd Ave N Ste 560 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_21-814_M-21-814
Ben	Nelson	benn@cmpasgroup.org	CMMPA	459 South Grove Street Blue Earth, MN 56013	Electronic Service	No	OFF_SL_21-814_M-21-814
Dale	Niezwaag	dniezwaag@bepec.com	Basin Electric Power Cooperative	1717 East Interstate Avenue Bismarck, ND 58503	Electronic Service	No	OFF_SL_21-814_M-21-814
David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency	220 South Sixth Street Suite 1300 Minneapolis, Minnesota 55402	Electronic Service	No	OFF_SL_21-814_M-21-814

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Sephra	Ninow	sephra.ninow@energycenter.org	Center for Sustainable Energy	426 17th Street, Suite 700 Oakland, CA 94612	Electronic Service	No	OFF_SL_21-814_M-21-814
Rolf	Nordstrom	rnordstrom@gpisd.net	Great Plains Institute	2801 21ST AVE S STE 220 Minneapolis, MN 55407-1229	Electronic Service	No	OFF_SL_21-814_M-21-814
Samantha	Norris	samanthanorris@alliantenergy.com	Interstate Power and Light Company	200 1st Street SE PO Box 351 Cedar Rapids, IA 524060351	Electronic Service	No	OFF_SL_21-814_M-21-814
David	O'Brien	david.obrien@navigant.com	Navigant Consulting	77 South Bedford St Ste 400 Burlington, MA 01803	Electronic Service	No	OFF_SL_21-814_M-21-814
Jeff	O'Neill	jeff.oneill@ci.monticello.mn.us	City of Monticello	505 Walnut Street Suite 1 Monticello, Minnesota 55362	Electronic Service	No	OFF_SL_21-814_M-21-814
Russell	Olson	rolson@hcpd.com	Heartland Consumers Power District	PO Box 248 Madison, SD 570420248	Electronic Service	No	OFF_SL_21-814_M-21-814
Carol A.	Overland	overland@legalectric.org	Legalelectric - Overland Law Office	1110 West Avenue Red Wing, MN 55066	Electronic Service	No	OFF_SL_21-814_M-21-814
Dan	Patry	dpatry@sunedison.com	SunEdison	600 Clipper Drive Belmont, CA 94002	Electronic Service	No	OFF_SL_21-814_M-21-814
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_21-814_M-21-814

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Jennifer	Peterson	jjpeterson@mnpower.com	Minnesota Power	30 West Superior Street Duluth, MN 55802	Electronic Service	No	OFF_SL_21-814_M-21-814
Hannah	Polikov	hpolikov@aee.net	Advanced Energy Economy Institute	1000 Vermont Ave, Third Floor Washington, DC 20005	Electronic Service	No	OFF_SL_21-814_M-21-814
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	OFF_SL_21-814_M-21-814
Mark	Rathbun	mrathbun@greenergy.com	Great River Energy	12300 Elm Creek Blvd Maple Grove, MN 55369	Electronic Service	No	OFF_SL_21-814_M-21-814
Michael	Reinertson	michael.reinertson@avanteenergy.com	Avant Energy	220 S. Sixth St. Ste 1300 Minneapolis, Minnesota 55402	Electronic Service	No	OFF_SL_21-814_M-21-814
John C.	Reinhardt	N/A	Laura A. Reinhardt	3552 26th Ave S Minneapolis, MN 55406	Paper Service	No	OFF_SL_21-814_M-21-814
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_21-814_M-21-814
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_21-814_M-21-814
Isabel	Ricker	ricker@fresh-energy.org	Fresh Energy	408 Saint Peter Street Suite 220 Saint Paul, MN 55102	Electronic Service	No	OFF_SL_21-814_M-21-814
Amanda	Rome	amanda.rome@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 5 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_21-814_M-21-814

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Robert K.	Sahr	bsahr@eastriver.coop	East River Electric Power Cooperative	P.O. Box 227 Madison, SD 57042	Electronic Service	No	OFF_SL_21-814_M-21-814
Joseph L	Sathe	jsathe@kennedy-graven.com	Kennedy & Graven, Chartered	150 S 5th St Ste 700 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-814_M-21-814
Richard	Savelkoul	rsavelkoul@martinsquires.com	Martin & Squires, P.A.	332 Minnesota Street Ste W2750 St. Paul, MN 55101	Electronic Service	No	OFF_SL_21-814_M-21-814
Thomas	Scharff	thomas.scharff@versoco.com	Verso Corp	600 High Street Wisconsin Rapids, WI 54495	Electronic Service	No	OFF_SL_21-814_M-21-814
Kay	Schraeder	kschraeder@minnkota.com	Minnkota Power	5301 32nd Ave S Grand Forks, ND 58201	Electronic Service	No	OFF_SL_21-814_M-21-814
Dean	Sedgwick	Sedgwick@Itascapower.com	Itasca Power Company	PO Box 455 Spring Lake, MN 56680	Electronic Service	No	OFF_SL_21-814_M-21-814
Maria	Seidler	maria.seidler@dom.com	Dominion Energy Technology	120 Tredegar Street Richmond, Virginia 23219	Electronic Service	No	OFF_SL_21-814_M-21-814
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th PI E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-814_M-21-814
Patricia F	Sharkey	psharkey@environmentalawcounsel.com	Midwest Cogeneration Association.	180 N LaSalle St Ste 3700 Chicago, IL 60601	Electronic Service	No	OFF_SL_21-814_M-21-814
Bria	Shea	bria.e.shea@xcelenergy.com	Xcel Energy	414 Nicollet Mall Minneapolis, MN 55401	Electronic Service	No	OFF_SL_21-814_M-21-814

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Doug	Shoemaker	dougs@charter.net	Minnesota Renewable Energy	2928 5th Ave S Minneapolis, MN 55408	Electronic Service	No	OFF_SL_21-814_M-21-814
Anne	Smart	anne.smart@chargepoint.com	ChargePoint, Inc.	254 E Hacienda Ave Campbell, CA 95008	Electronic Service	No	OFF_SL_21-814_M-21-814
Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.	76 W Kellogg Blvd St. Paul, MN 55102	Electronic Service	No	OFF_SL_21-814_M-21-814
Ken	Smith	ken.smith@ever-greenenergy.com	Ever Green Energy	305 Saint Peter St Saint Paul, MN 55102	Electronic Service	No	OFF_SL_21-814_M-21-814
Trevor	Smith	trevor.smith@avantenergy.com	Avant Energy, Inc.	220 South Sixth Street Suite 1300 Minneapolis, Minnesota 55402	Electronic Service	No	OFF_SL_21-814_M-21-814
Joshua	Smith	joshua.smith@sierraclub.org		85 Second St FL 2 San Francisco, California 94105	Electronic Service	No	OFF_SL_21-814_M-21-814
Beth H.	Soholt	bsoholt@windonthewires.org	Wind on the Wires	570 Asbury Street Suite 201 St. Paul, MN 55104	Electronic Service	No	OFF_SL_21-814_M-21-814
Sky	Stanfield	stanfield@smwlaw.com	Shute, Mihaly & Weinberger	396 Hayes Street San Francisco, CA 94102	Electronic Service	No	OFF_SL_21-814_M-21-814
Tom	Stanton	tstanton@nrri.org	NRRI	1080 Carmack Road Columbus, OH 43210	Electronic Service	No	OFF_SL_21-814_M-21-814
Byron E.	Starns	byron.starns@stinson.com	STINSON LLP	50 S 6th St Ste 2600 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-814_M-21-814

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
James M	Strommen	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered	150 S 5th St Ste 700 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-814_M-21-814
Eric	Swanson	eswanson@winthrop.com	Winthrop & Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_21-814_M-21-814
Lynnette	Sweet	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	Yes	OFF_SL_21-814_M-21-814
Peter	Teigland	pteigland@mnseia.org	Minnesota Solar Energy Industries Association	2288 University Ave W Saint Paul, MN 55114	Electronic Service	No	OFF_SL_21-814_M-21-814
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_21-814_M-21-814
Pat	Treseler	pat.jcplaw@comcast.net	Paulson Law Office LTD	4445 W 77th Street Suite 224 Edina, MN 55435	Electronic Service	No	OFF_SL_21-814_M-21-814
Lise	Trudeau	lise.trudeau@state.mn.us	Department of Commerce	85 7th Place East Suite 500 Saint Paul, MN 55101	Electronic Service	No	OFF_SL_21-814_M-21-814
Karen	Turnboom	karen.turnboom@versocom.com	Verso Corporation	100 Central Avenue Duluth, MN 55807	Electronic Service	No	OFF_SL_21-814_M-21-814
Thomas	Tynes	jjazynka@energyfreedomcoalition.com	Energy Freedom Coalition of America	101 Constitution Ave NW Ste 525 East Washington, DC 20001	Electronic Service	No	OFF_SL_21-814_M-21-814

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Lisa	Veith	lisa.veith@ci.stpaul.mn.us	City of St. Paul	400 City Hall and Courthouse 15 West Kellogg Blvd. St. Paul, MN 55102	Electronic Service	No	OFF_SL_21-814_M-21-814
Curt	Volkman	curt@newenergy- advisors.com	Fresh Energy	408 St Peter St Saint Paul, MN 55102	Electronic Service	No	OFF_SL_21-814_M-21-814
Roger	Warehime	roger.warehime@owatonna utilities.com	Owatonna Municipal Public Utilities	208 S Walnut Ave PO BOX 800 Owatonna, MN 55060	Electronic Service	No	OFF_SL_21-814_M-21-814
Jenna	Warmuth	jwarmuth@mnpower.com	Minnesota Power	30 W Superior St Duluth, MN 55802-2093	Electronic Service	No	OFF_SL_21-814_M-21-814
Samantha	Williams	swilliams@nrdc.org	Natural Resources Defense Council	20 N. Wacker Drive Ste 1600 Chicago, IL 60606	Electronic Service	No	OFF_SL_21-814_M-21-814
Joseph	Windler	jwindler@winthrop.com	Winthrop & Weinstine	225 South Sixth Street, Suite 3500 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-814_M-21-814
Robyn	Woeste	robynwoeste@alliantenerg y.com	Interstate Power and Light Company	200 First St SE Cedar Rapids, IA 52401	Electronic Service	No	OFF_SL_21-814_M-21-814
Yochi	Zakai	yzakai@smwlaw.com	SHUTE, MIHALY & WEINBERGER LLP	396 Hayes Street San Francisco, CA 94102	Electronic Service	No	OFF_SL_21-814_M-21-814
Christopher	Zibart	czibart@atcllc.com	American Transmission Company LLC	W234 N2000 Ridgeview Pkwyt Court Waukesha, WI 53188-1022	Electronic Service	No	OFF_SL_21-814_M-21-814

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Patrick	Zomer	Pat.Zomer@lawmoss.com	Moss & Barnett PA	150 S 5th St #1200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-814_M-21-814