



414 Nicollet Mall  
Minneapolis, MN 55401

November 16, 2022

—Via Electronic Filing—

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

RE: REPLY COMMENTS  
TRANSMISSION COST RECOVERY RIDER  
DOCKET NOS. E002/M-20-680 & E002/M-21-814

Dear Mr. Seuffert:

Northern States Power Company, doing business as Xcel Energy, submits to the Minnesota Public Utilities Commission the enclosed Reply to the October 17, 2022 Comments of the Minnesota Department of Commerce – Division of Energy Resources (Department), the Office of Attorney General – Residential Utilities Division (OAG), and Citizens Utility Board (CUB) in accordance with the Commission's August 22, 2022 Notice of Comment Period.

Today, we received the Joint Recommendation filed by the Department, OAG, and CUB. Parties did not discuss this recommendation with us prior to filing, and good-faith attempts that we made to continue discussing this docket with the Department were met with delayed responses. Given the timing of the Joint Recommendation, we cannot respond in detail to the recommendations made therein. That said, in these Reply Comments, we generally address the issues raised in the Joint Recommendation. We also provide these initial reactions to key elements of the Joint Recommendation:

- As noted in the Reply Comments, we do not oppose imposition of cost caps related to AMI and FAN. To the extent the Commission adopts any cost caps, however, they should be applied in an aggregate basis to allow the Company reasonable and appropriate flexibility in managing costs as we install AMI and FAN. In addition, cost caps should be set based on current information provided in this docket, not on outdated budget information that we have since updated. At a bare minimum, they should not be set by picking and choosing preferred numbers from multiple vintages of budgets,

as the Department, OAG, and CUB have done in their Joint Recommendation.

- The Company supports returning applicable revenues from AMI and FAN to customers through the TCR Rider, but cost savings reflected in the Company's cost-benefit analyses are compared against a future without AMI and FAN, and as a result are not trackable in a way that would facilitate "return[ing]" them to customers. Instead, such savings will be realized by customers over time through normal rate setting processes.
- Given the establishment of cost caps, and the requirement to return revenue from AMI and FAN to customers, PIMs related to these investments are unnecessary, and imposing PIMs at this time on this record would conflict with Commission precedent regarding performance-based ratemaking. It is not clear that all the proposed metrics and targets can be tracked, and even if they can, what an appropriate baseline would be given that the "targets" are based on a cost-benefit analysis and future scenario that will not occur. To the extent the Commission does require the establishment of PIMs for these investments, those PIMs should not be one-sided penalties as proposed by the Department, OAG, and CUB. The imposition of PIMs in general, and particularly such an approach to PIMs, would *disincentivize* utilities from investing in grid modernization, and would conflict with the Legislature's clear goal of *incentivizing* grid modernization investments, as reflected in Minn. Stat. §§ 216B.16, Subd. 7b and 216B.2425.

We reserve the right to provide a more fulsome response to the Joint Recommendation once we have had a reasonable opportunity to assess it.

We have electronically filed this document with the Minnesota Public Utilities Commission, and copies have been served on the parties on the attached service lists. Please contact Rebecca Eilers at (612) 330-5570 or [rebecca.d.eilers@xcelenergy.com](mailto:rebecca.d.eilers@xcelenergy.com) or me at (612) 330-5941 or [holly.r.hinman@xcelenergy.com](mailto:holly.r.hinman@xcelenergy.com).

Sincerely,

/s/

HOLLY HINMAN  
DIRECTOR, REGULATORY & STRATEGIC ANALYSIS

Enclosures  
cc: Service Lists

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 THE PETITION OF  
NORTHERN STATES POWER COMPANY  
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

IN THE MATTER OF THE PETITION OF  
NORTHERN STATES POWER COMPANY  
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COST RECOVERY RIDER REVENUE  
REQUIREMENTS FOR 2021 AND REVISED  
ADJUSTMENT FACTORS

DOCKET No. E002/M-20-680

**REPLY COMMENTS**

**INTRODUCTION**

Northern States Power Company, doing business as Xcel Energy, submits to the Minnesota Public Utilities Commission this Reply to the October 17, 2022 Comments of the Minnesota Department of Commerce – Division of Energy Resources (Department), the Office of Attorney General – Residential Utilities Division (OAG), and the Citizens Utility Board of Minnesota (CUB) in accordance with the Commission’s August 22, 2022 Notice of Comment Period.

We appreciate the Department’s recommendation that the Commission approve the Company’s proposed transmission costs. The Department also provided Comments from its consultant, Synapse Energy Economics, Inc. (Synapse) regarding the Company’s request for cost recovery for its Advanced Metering Infrastructure (AMI) and Field Area Network (FAN) projects. As the Department recommended recovery for the transmission projects and those projects were not discussed by Synapse, CUB, or OAG, our focus in these Reply Comments is primarily AMI and FAN.

As the record in this Docket shows, the Company's planned investments in AMI and FAN are prudent and necessary for the Company to develop and operate the modern distribution grid that our customers, the Commission and other stakeholders want. We appreciate the general support parties in this Docket have expressed for these investments, and we do not object to certain recommendations they make, like the establishment of cost caps. That said, a number of the recommendations made by Synapse, CUB, and the OAG are either unnecessary, unworkable, or inconsistent with past Commission precedent.

In this Reply, we explain that the grid modernization costs for which we seek recovery in this proceeding are necessary and similar to investments brought forward by not only the Company, but by other utilities in Minnesota and across the nation. As a result, there is no need to create additional regulatory process and hurdles related to these projects, and the Company's request for Rider recovery of the projects under established Minnesota law should be approved.

Specifically, the Company responds to specific parties' comments regarding:

- Compliance with the Commission's filing requirements;
- Establishment of cost caps;
- Treatment of cost savings from AMI and FAN;
- Reporting, and performance incentive mechanisms, and
- Additional process for considering grid modernization investments.

In sum, the Company understands that cost caps, with the opportunity to recover amounts in excess of the cap in a future rate case, have been used previously in conjunction with this Rider. Recognizing that, we agree that AMI and FAN should be treated similarly to other TCR Rider projects and do not oppose the parties' proposals for such a cap. Additionally, the Company's existing ratemaking tools are appropriate for returning incremental cost savings or revenues from the AMI and FAN investments to customers. As such, there is no need to establish any specific, new mechanism to do the same; and any new performance-based cost recovery paradigms are wholly unnecessary at this time. Finally, the Company disagrees with the idea that a new venue or process is needed for consideration of grid modernization projects as an alternative to the legislatively-authorized use of the TCR Rider.

## **REPLY**

We appreciate the thorough review of our Petition and Supplement, and respond to the commenters' specific recommendations below. However, before turning to those

details, we provide some general context regarding the AMI and FAN projects and why cost recovery for them in this Rider is warranted.

As the information presented in the Company's Petition and Supplemental Comments demonstrated, we need to replace our aging AMR meters for which the manufacturer is no longer producing replacement parts. We prudently chose to do so using AMI metering, which is now the industry norm,<sup>1</sup> including in Minnesota. As the Commission is aware, Minnesota Power has been utilizing AMI meters since 2011, Otter Tail Power proposed and received approval for its AMI and FAN project in Docket No. E017/M-21-382,<sup>2</sup> and Dakota Electric's petition for recovery of its AMI investments was approved in Docket No. E111/M-17-821.<sup>3</sup> Accordingly, while AMI meters are new to the Company, our decision to transition to this form of metering is consistent with current standard practices across the electric utility industry and in Minnesota.

Our use of the TCR Rider for AMI and FAN is supported by specific statutory language, Commission certification, and prior Commission precedent. In Minn. Stat. 216B.2425, subd. 2(e) and Minn. Stat. 216B.16, subd. 7b(b)(5), the Minnesota Legislature explicitly created a mechanism for Rider recovery of distribution grid modernization investments, including, among other things, those involving the use of "two-way meters." Our ability to apply for cost recovery in the TCR Rider for AMI and FAN was also expressly authorized by the Commission when it certified these projects. And, it is consistent with past Commission approval of Rider recovery for other grid modernization projects, including the Advanced Distribution Management System (ADMS).

In summary, AMI and FAN are precisely the sort of grid modernization projects for which the Legislature authorized potential rate recovery via the TCR Rider. While the Company expects its requests for cost recovery to be carefully examined, as has occurred in this docket, any suggestion that recovery of project expenses through the TCR Rider is inappropriate or inconsistent with Commission precedent is incorrect. Nor should these investments be subjected to novel requirements such as Performance Incentive Mechanisms (PIMs) or non-standard processes for project-related cost savings. This docket contains a robust record demonstrating the

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<sup>1</sup> As noted in our Supplemental Comments at page 30, AMI meters now serve approximately 65 percent of utility customers in the United States.

<sup>2</sup> The August 4, 2022 Order in Docket No. E017/M-21-382 contained a cost cap, but allowed Otter Tail to seek recovery of additional costs in a future rate case. It also required Otter Tail to propose reporting requirements.

<sup>3</sup> Order Approving Recovery of Grid Modernization Costs, Docket No. E111/M-17-821, May 8, 2018.

Company's prudence in planning and procuring AMI and FAN. With the benefit of that record, the Commission should approve the Company's Petition.

**A. The Company Has Complied With the Commission's Filing Requirements**

In prior orders—specifically, the September 27, 2019 Order in Docket No. E002/M-17-797 (the 2019 Order) and the July 23, 2020 Order in Docket No. E002/M-19-666 (the 2020 Order)—the Commission set forth extensive requirements regarding filing requirements for future grid modernization investments. The Company's Petition complied with the Commission's requirements. Among other things, we provided an overall cost-benefit analysis (CBA) for AMI and FAN, an extensive discussion of various alternatives, and a proposal for project-related reporting. Then, we further supplemented the record by providing additional information and a CBA sensitivity analysis in our Supplement.

Among other things, Order Point 10(b) from the 2020 Order provided that a future cost recovery proposal must include:

a demonstration that the utility has thoroughly considered the feasibility, costs, and benefits of alternatives, and that the proposed approach is preferable to alternatives. In *discussing the alternatives*, Xcel should compare different types of the same technology, for example, by comparing different AMI meters.

(Emphasis added.)

In our Petition and Supplement, we provided thorough discussions of different possible alternatives, including other technological options and various AMI meters, that the Company considered. With regard to the different AMI meters, Attachment C to our Supplement contains detailed information regarding considerations that led to the Company's selection of the Itron Riva 4.2 meter, including pricing, schedule, and ease of integration. The Company thus provided a comparison of different AMI meters in discussing alternatives and, therefore, complied with the Commission's filing requirements.

In its comments, however, Synapse incorrectly suggested that we did not comply with this order point. Specifically, Synapse interprets Order Point 10(b) to mean that the Company was required to provide a CBA specifically comparing the Riva 4.2 meter

with other, different AMI meters that the Company could have purchased.<sup>4</sup> Synapse, however, is reading its own preference for CBAs into the Order Point. The Commission is familiar with CBAs, and when it requires one, it says so. For example, in the 2019 Order, the Commission explicitly required the Company to provide a “cost-benefit analysis” as part of future Advanced Grid Intelligence and Security cost recovery proposals.<sup>5</sup>

Order point 10(b) from the 2020 Order required the Company to demonstrate that it had thoroughly considered different options, and in “discussing” alternatives, we were required to compare different types of the same technology, including with regard to different AMI meters. Discussion and comparisons are not the same as a CBA. As it appears Synapse is seeking to impose a requirement based on the Guidance Document it prepared for the Department, we note that the Commission has explicitly declined to adopt that document.<sup>6</sup>

Consistent with the Procedural Agreement between the Department and the Company, we worked in good faith to provide additional information Synapse sought in our Supplement so as to facilitate its analysis of AMI and FAN. However, it would be impractical for the Company to create CBAs comparing all possible technological and purchasing options that we could have conceivably pursued in replacing the aging AMR meters. Such an approach is not consistent with how utilities actually plan and implement major projects. We make decisions at various points that necessarily foreclose other options. It would also be unduly burdensome to create CBAs comparing the sheer number of different possible combinations of, among other things, communications technologies and protocols, meter types, and manufacturers for AMI and FAN.

## **B. Any Cost Cap Should Be Consistent with Prior Commission Orders**

While Synapse, OAG, and CUB all recommend approval of cost recovery for AMI and FAN, they also each proposed a cap on cost recovery via the TCR Rider. Given Commission precedent, the Company does not object to imposition of a cost cap for AMI and FAN recovery in this Rider. Consistent with Commission precedent, however, any such cap should allow for the potential recovery of additional costs in a

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<sup>4</sup> Synapse Comments (Attachment 1 to Department Comments) at pp. 3-5.

<sup>5</sup> At Order Point 9.B. Notably, that same order point also provided a list of “principles” from the Commission including a requirement for analysis “compared with traditional resources or technologies,” which is consistent with the approach taken by the Company in its CBA.

<sup>6</sup> ORDER DECLINING TO ADOPT GUIDANCE DOCUMENT, Docket Nos. E002/M-21-694, E015/M-21-390, E017/M-21-612, and E111/M-21-728, October 14, 2022.

future rate case, provided the Company meets its burden of proving the prudence of such costs.

As Synapse noted, a cap on the amount recoverable for a grid modernization project would not be novel. The 2020 Order set a cap for the Advanced Planning Tool/LoadSEER and more recently the Commission set a “soft cost cap” for ADMS, which allows the Company to seek costs in excess of the capped amount in a rate case.<sup>7</sup> The Company does not object to an analogous cap for AMI and FAN. However, like Synapse, we also believe it is appropriate that the Company be given the opportunity to recover costs above the capped amount in a future rate case, as has been the case with past caps. This form of cap would be consistent with the Commission’s August 4, 2022 Order with respect to Otter Tail Power’s AMI project in Docket No. E017/M-21-382, and with caps set by the Commission for various TCR Rider projects.<sup>8</sup>

The implementation of a “soft cap” is particularly relevant in the present circumstances. In its Comments, Synapse recognized “the constellation of current issues related to supply chain constraints and other inflationary pressures may create price increases that the Company cannot foresee.”<sup>9</sup> We appreciate Synapse’s recognition of the reality that the Company is not immune to the current inflationary and supply chain pressures, and these pressures will likely persist as deployment proceeds.

In its discussion of a proposed cost cap, CUB also suggested a separate cap for project O&M costs.<sup>10</sup> No such distinct treatment is necessary or appropriate. The Company understands that a cost cap for rider recovery would apply to both the capital and O&M amounts we presented in our Petition, and any recovery above

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<sup>7</sup> ORDER AUTHORIZING RIDER RECOVERY, SETTING RETURN ON EQUITY, AND SETTING FILING REQUIREMENTS, *In the Matter of Northern States Power Company d/b/a Xcel Energy’s Petition for Approval of the Transmission Cost Recovery Rider Revenue Requirement for 2019 and 2020 and Revised Adjustment Factors*, Docket No. E002/M-19-721, December 10, 2021 at Order Point 9.

<sup>8</sup> *Id.*; *In the Matter of Xcel Energy’s Petition for Approval of 2012 Transmission Cost Recovery (TCR), Project Eligibility, TCR Rate Factors, and 2011 True-up*, ORDER APPROVING 2012 TCR PROJECT ELIGIBILITY AND RIDER, CAPPING COSTS, AND MODIFYING 2011 TRACKER REPORT, Feb. 7, 2014 at 7-9 (setting cap, but noting that “Xcel will have the opportunity to seek recovery of excluded but prudent costs in its pending rate case”); *In the Matter of Northern States Power Company, a Minnesota Corporation, d/b/a Xcel Energy, for Approval of a Modification to its TCR Tariff, 2010 Project Eligibility, TCR Rate Factors, Continuation of Deferred Accounting, and 2009 True-up Report*, ORDER APPROVING 2010 TCR PROJECT ELIGIBILITY AND RIDER, 2009 TCR TRACKER REPORT, AND TCR RATE FACTORS, Docket No. E002/M-09-1048, April 27, 2010 at Order Point 4 (stating that “going forward” TCR project costs recovered through the Rider shall be limited to estimated amounts “with the opportunity” for additional recovery in “a subsequent rate case”).

<sup>9</sup> Synapse Comments (Attachment 1 to Department Comments) at p. 10.

<sup>10</sup> CUB Comments at pp. 6-7.



those amounts, capital or O&M, could only be obtained in a rate case. Accordingly, a mechanism focused solely on O&M would be duplicative and is not needed.

### **C. Savings Will Be Reflected in the Company's Cost of Service**

AMI and FAN will benefit our customers in a variety of ways, including by, for example, providing better insights into energy usage, facilitating advanced rate designs, and reducing various distribution system costs. The benefits of reduced distribution system costs will be passed on to customers through the normal, existing process of cost recovery and ratemaking. The Commission should rely on those mechanisms, as it has for other Rider projects, without establishing a new and separate process applicable to AMI and FAN only.

In their Comments, CUB and the OAG proposed consideration of a novel mechanism to return incremental cost savings and revenues resulting from AMI and FAN to customers. Such a new mechanism is unnecessary, however, because the realization of these benefits via the adjustment of revenues is already embedded in the existing cost recovery and ratemaking process. More specifically, the inherent improvements and efficiencies resulting from AMI and FAN will result in a lower cost of service. Customers will benefit because the revenue requirement and rates established in future riders and rate cases will thus be lower than they would have been had we not pursued AMI and FAN. In this respect, many of the efficiencies from AMI and FAN will benefit customers in the same manner as any other capital investment that produces cost savings. For example, the Commission has approved numerous wind projects for rider recovery based in part on projected savings for customers, without establishing separate, specific mechanisms to credit cost savings.

CUB suggests that a specific savings mechanism is necessary because of the lag between when cost savings from AMI will be realized and when they are reflected in rates. As an initial note, some expected savings from AMI are already reflected in the electric rate case that the Company filed in November 2021.<sup>11</sup> In the rate case, the Company presented a five-year budget for the years 2022 to 2026. Within that budget, the Company has already accounted for over \$31.5 million in savings over that five-year period from fees that would otherwise be paid for AMR meter reading services under our existing contract. Other savings will materialize later and be realized by customers in future rate or rider proceedings. Flowing the benefits to customers now, however, would potentially create intergenerational equity issues and require complicated ratemaking treatment. AMI is no different from any other large project that is expected to produce future efficiencies and savings. The Commission

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<sup>11</sup> Docket No. E002/GR-21-630.

should follow its normal practice and allow for savings to be passed on as a result of the normal cadence of rate case filings, as is already occurring.

Finally, CUB offered another recommendation regarding potential Company revenue from providing third parties with utility or customer data from AMI.<sup>12</sup> The Company is not expecting any such revenue from AMI in the immediate term. However, in the event that AMI does generate revenue, those amounts would further reduce our cost of service and the benefit to customers would be accounted for in the normal course of ratemaking.

#### **D. The Company Commits to Robust Reporting, and Performance Incentive Mechanisms are Not Appropriate**

The Company has proposed robust reporting regarding AMI and FAN, which is detailed in Attachment A. Our proposal largely accepts the Department's own prior recommendations and consists of 50 reporting items over two phases. The Commission should accept our recommendations, which are tied to our CBA, to the extent they will be useful. The Commission should not, however, impose PIMs at this time as recommended by Synapse and the OAG,<sup>13</sup> which would be inconsistent with prior Commission orders with regard to both this TCR Rider and Performance Based Ratemaking (PBR) in general.

In order to understand the recommendations and our response, we will briefly provide some background. In prior orders, the Commission has been clear that it expects reporting regarding AMI and the benefits it creates. In the 2019 Order, in Order Point 9.B.2, the Commission provided for reporting obligations and required an explanation of how project benefits can be monitored over time. Similarly, Order Point 8 from the 2020 Order contemplated "Commission-approved metrics and performance evaluations" and stated that future proposals for cost recovery would need to include a proposal for such reporting and evaluation. The 2020 Order also provided for a process that was to result in the reporting requirements for AMI. Specifically, Order Point 9 requested that the Department file a report that would, among other things, "include recommendations on specific metrics" and "detailed methods for evaluating performance". The report was to be informed by a stakeholder process.

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<sup>12</sup> CUB Reply Comments at pp. 7-8.

<sup>13</sup> Synapse Comments (Attachment 1 to Department Reply Comments) at pp. 7-9; OAG Reply Comments at pp. 8-12.

Consistent with that order point, the Department filed its report titled, “Methods for Performance Evaluations, Metrics, and Consumer Protections for AMI and FAN” on December 1, 2020 in Docket Nos. E002/M-19-666 and E999/DI-20-627 (Department Report). In accordance with the Commission’s request, the Department Report contained an Appendix E listing proposed reporting requirements.

In our Petition, we agreed to report on the items identified in Tables 12 through 16 and Tables 18 and 19 from Attachment 4, which were derived from Appendix E to the Department Report. We accepted the majority of the Department’s recommended requirements related to AMI and FAN, and explained when certain proposed items were either more appropriate for other dockets or could not be calculated. Then, in our Supplement, we agreed to tie our reporting back to the anticipated benefits outlined in our 2022 Supplement CBA, where applicable and to the extent practicable. In these Reply Comments, we offer additional, specific detail regarding our proposed reporting, which are set forth in Attachment A. With respect to expected benefits, we note that in our CBA, most benefits were not projected to begin accruing until 2024. Accordingly, Attachment A reflects a plan under which we would begin by reporting on up to 31 deployment-related data points in 2023, and then begin post-deployment reporting on up to 19 items beginning in 2025 and continuing quarterly (including an annual report) for three years.

However, although our proposed reporting is based on the Department’s own Report, Synapse is now recommending PBR and the establishment of “contingent cost recovery mechanisms” similar to PIMs.<sup>14</sup> Synapse’s recommendation is inconsistent with the Department’s own Report and is not necessary. It also is not required by the Commission’s prior orders and does not comport with the Commission’s PBR process.

While the Commission’s prior Orders provided for reporting requirements, they did not state that achievement of targets would be required for cost recovery. Specifically, Order Point 8 from the 2020 Order refers to metrics and performance evaluation, but does not discuss requiring them for full cost recovery. Moreover, it was clear at the hearing that resulted in that Order that cost recovery was not to be conditioned on achievement of specific metrics.<sup>15</sup>

If, however, the Commission wishes to explore the possibility of implementing PBR with regard to AMI and FAN, it should only do so consistent with and in the existing PBR proceeding (Docket No. E002/CI-17-401), where the Commission has

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<sup>14</sup> Synapse Comments (Attachment 1 to Department Reply Comments) at p. 6.

<sup>15</sup> See Docket No. E002/M-19-666, May 29, 2020 Tr. at 123:15-124:13.

established, after substantial record development, a flexible but standardized framework to guide the development of performance metrics. A primary piece of that framework is a PIM mechanism process with a Goals-Outcomes-Metrics hierarchy, that is paired with a set of design principles. In 2019, the Commission established goals for the PIM process and the outcomes that it sought to achieve.<sup>16</sup> Then, after an extensive stakeholder process and record development, the Commission approved performance metrics and ordered the Company to work with parties to develop and propose a plan to calculate, verify, and report the metrics.<sup>17</sup> In 2022, the Commission ordered the Company to “provide three years of data before developing evaluation and benchmarking targets for the performance metric.”<sup>18</sup> The Company’s next report is due in April 2023. Although Synapse suggests it is proposing a similar process for establishing its recommended “contingent cost recovery mechanisms”, what Synapse actually proposes is fundamentally new and inconsistent with the regulatory compact and the Commission’s precedent with regard to the proper approach for PBR.

The Company strenuously emphasizes that PIMs for AMI and FAN are not appropriate, but we also believe that further discussion of the concept, if any, should only occur within the appropriate docket and as part of the broader consideration of PBR. A separate PBR-like docket solely focused on AMI and FAN would create burdens for stakeholders and the Commission, and could also give rise to inconsistencies with the existing PBR process.

#### **E. The Commission has Established a Process for Evaluating Grid Modernization Investments**

In its Comments, Synapse recommended that the Commission incorporate additional filing requirements for filings related to grid modernization investments and alter its process for consideration of such investments.<sup>19</sup> We disagree with Synapse and believe the TCR Rider process continues to be a suitable venue to consider cost recovery for these investments, which is consistent with the Legislature’s intent. The Company understands that the Department is planning to open an investigation to address consideration of utility grid modernization investments, and we look forward to constructively engaging in that matter along with the other utilities and other stakeholders.

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<sup>16</sup> Order Establishing Performance-Incentive Mechanism Process (January 8, 2019), Docket No. E002/CI-17-401.

<sup>17</sup> Order Establishing Performance Metrics (September 18, 2019), Docket No. E002/CI-17-401.

<sup>18</sup> Order Accepting Report and Setting Additional Requirements (February 9, 2022), Docket No. E002/CI-17-401, at Order Point 5.

<sup>19</sup> Synapse Comments (Attachment 1 to Department Comments) at pp. 12-13.

## **CONCLUSION**

The record in this docket amply demonstrates the Company's need for AMI and FAN, the benefits the projects will bring, and the prudence of our planning and procurement decisions. We respectfully request that the Commission approval our proposed 2021 and 2022 TCR Rider revenue requirements and associated Adjustment Factors as supplemented by our August 17, 2022 Comments and these Reply Comments.

Dated: November 16, 2022

Northern States Power Company

## DETAILS ON PROPOSED AMI & FAN REPORTING

This Attachment provides some additional information regarding our proposed reporting for Advanced Metering Infrastructure (AMI) and Field Area Network (FAN) investments. As shown in Table 1 and Table 2 below, we have committed to report 50 items in two phases, with some information that would be reported for both the deployment and post-deployment phases. We would report some items annually, with other items reported quarterly. This plan is based on the reporting we have already agreed to provide, which was set forth in Attachment 4 of our Petition in this docket, with certain items consolidated consistent with the notes and descriptions provided in Attachment 4. Attachment 4, in turn, was based on the recommended reporting in the Department's December 1, 2020 report titled, "Methods for Performance Evaluations, Metrics, and Consumer Protections for AMI and FAN" in Docket Nos. E002/M-19-666 and E999/DI-20-627.

As stated in our Supplement, after discussions with the Department and its consultant, Synapse Energy Economics, we further agreed to correlate our reporting to the associated benefits used in our cost-benefit analysis (CBA), where applicable. Accordingly, the proposed reporting items that have a corresponding value in the CBA are denoted in the tables with a single asterisk. We clarify however, correlating our reporting to values assumptions in the CBA are not performance targets as that concept is generally understood in the context of Performance Based Ratemaking (PBR).

While the Company is willing to provide all the information listed below, we also want to ensure that the reporting we provide is meaningful to the Commission. Reporting has no value in and of itself, and providing too many types of information can in some instances distract from the most relevant data. Accordingly, if the Commission determines that one or more of the proposed reporting items is not necessary, we welcome such input.

The first phase of our reporting would focus on deployment-related items and the second would layer in post-deployment items. We propose beginning quarterly reporting of deployment-related information in the first quarter of 2023 (by April 1) for deployment data from calendar year 2022. After that initial report for calendar year 2022, ongoing reports would be quarterly, and would provide the deployment information for the preceding quarter.<sup>1</sup> Quarterly deployment reporting would then

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<sup>1</sup> For example, the report made in the second quarter of 2023 would contain the deployment information for

continue through the first quarter of 2025, and include data from the last quarter of 2024, when deployment is expected to be complete.

Phase 2 of our reporting, which will be the non-deployment-related items, would begin in 2025. This approach aligns with CBA, in which most of the benefits begin to accrue in 2024 – and also because the software efforts to enable the reporting is scheduled to be complete in 2024. Our first report would be for January 1 through March 31, 2025, submitted no later than June 1, 2025. We would continue the Phase 2 reporting for three years post-deployment, through the first quarter of 2028 (submitted June 1, 2028).

The Company proposes to file the first phase of reporting in our most recent TCR docket, and subsequent reporting (starting in 2025) in the most recent IDP docket.

**Table 1: Proposed Deployment-Related Reporting**

Category	Item No.	Item/Definition	Calculation/Notes <sup>2</sup>	Reporting Frequency	TCR Attachment 4 Table
Installation and Deployment	1	Number of AMI meters installed and in use for billing <sup>3</sup>	Count of meters installed by Service Point	Quarterly	13 & 15
	2	Percentage of AMI meters deployed compared to plan	Count of meters installed by Service Point / total planned Service Points	Quarterly	13
	3	Percentage of customers with AMI meters	Meters installed by Service Point / Total Minnesota Service Points in the AMI deployment.	Quarterly	13
	4	Percentage of FAN deployed	Number and percent of FAN devices deployed.	Quarterly	13
	5	Percentage of FAN deployed compared to planned installation	Percent of FAN devices deployed / total planned devices.	Quarterly	13
	6	Number of missed installation appointments	Will distinguish between customer and Company-missed appointments.	Quarterly	13

January 1 through March 31, 2023.

<sup>2</sup> One asterisk (\*) denotes that the CBA includes a corresponding benefit value, to be provided in reporting as a comparison point. Two asterisks (\*\*) denotes items that are included in both deployment and post-deployment reporting.

<sup>3</sup> This item was originally two separate items in Table 13 and Table 15 of Attachment 4. Because the number of meters deployed will be the same as the number of meters used for billing, we have combined the two items here.

Category	Item No.	Item/Definition	Calculation/Notes <sup>2</sup>	Reporting Frequency	TCR Attachment 4 Table
	7	Number of customers electing to opt-out of AMI installation	Count of customers (Service Points) selecting Manual Meter Reading Service Tariff.	Quarterly	13
	8	Number of calls to Customer Contact Center and meter installation vendor regarding meter installation	Number of customer contacts related to AMI meter installation by month.	Quarterly	13
	9	Number of complaints regarding AMI installation	Number of formal complaints received by month.	Quarterly	13
Customer	10	Survey results of customers on the adequacy and clarity of communications prior to installation of AMI meters	Rated satisfaction with communications received prior to AMI installation. <i>Note: part of AMI installation survey</i>	Quarterly	12 and 16
	11	Percentage of customers with an AMI meter that have made a complaint of inaccurate meter readings	Percentage of customers with AMI that have made a complaint about inaccurate billing.**	Quarterly	15
	12	Number of customers with an AMI meter with an active web portal (My Account) account	Count of customers that activate My Account post-AMI install. Activated is defined as within last 90 days.**	Quarterly	15
	13	Number of monthly, unique visits to the web portal (My Account)	Count of customers with an AMI meter that visit My Account.**	Quarterly	15
	14	Percentage of customers with an AMI meter at least 30 days that are targeted with energy savings messaging	Monthly count of customers with AMI meters with targeted messaging in last 30 days.**	Quarterly	16
	15	Percentage of low-income customers with an AMI meter at least 30 days that are targeted with energy savings messaging	Monthly count of LIHEAP customers with AMI meters with targeted messaging in last 30 days.**	Quarterly	16



Category	Item No.	Item/Definition	Calculation/Notes <sup>2</sup>	Reporting Frequency	TCR Attachment 4 Table
Customer	16	Percentage of customers with an AMI meter with Home Area Network (HAN) functionality	AMI customers with HAN function enabled / Total customers with AMI.**	Quarterly	15
	17	Number of customers with an AMI meter with Home Area Network (HAN) functionality	Count of AMI customers with HAN enabled.**	Quarterly	15
	18	Percent of customers with an AMI meter with Green Button Connect My Data (CMD) functionality	Customers enrolled in CMD / total customers.** <i>Note: All customers will have CMD functionality.</i>	Quarterly	15
	19	Number of customers with an AMI meter with Green Button Connect My Data (CMD) functionality	Count of customers enrolling in CMD in previous 90 days.** <i>Note: All customers will have CMD functionality.</i>	Quarterly	15
	20	Number of customer/account inquiries regarding AMI	Count of customer inquiries regarding AMI that are not reported as part of some other AMI-related call metric.	Quarterly	15
	21	Number of organizational events attended where information on AMI presented, by region	Defined as total events specifically hosted by Xcel Energy with information regarding AMI.	Quarterly	16
	22	Customer access to hourly or sub-hourly data	Count of unique customers accessing energy usage data through the portal within last 90 days. <i>Note: AMI customers will be able to see sub-hourly data; non-AMI customers will see daily data.</i>	Quarterly	16
	23	Percentage of customers aware of AMI	Customers aware of AMI / Total customers surveyed. <i>Note: Part of Residential Pulse Survey conducted 4x/year.</i>	Annually	16
Customer	24	Percentage of low-income customers aware of AMI	LIHEAP customers aware of AMI / Total LIHEAP customers surveyed. <i>Note: Part of Residential Pulse Survey conducted 4x/year.</i>	Annually	16

Category	Item No.	Item/Definition	Calculation/Notes <sup>2</sup>	Reporting Frequency	TCR Attachment 4 Table
	25	Understanding of AMI technology and benefits	As part of our AMI installation surveys or Residential Pulse Surveys, we will ask customers questions to gauge their understanding of new meter technology and benefits. <i>Note: part of AMI installation survey and/or Residential Pulse Survey conducted 4x/year.</i>	Annually	16
	26	Variety, quality, accessibility of customer data available (consistent with privacy and CEUD requirements)	Narrative explanation of customer data available to customers.	Annually	16
Project Financials	27	Total AMI project capital spend to-date vs. total AMI project capital budget	<i>Report by AMI/FAN and capital/O&amp;M as follows:</i> <b>Project spend:</b> Actual NSPM Electric spend to-date plus current year forecast. <b>Budget baseline:</b> actual NSPM Electric spend to-date plus the remaining budget at a point in time.	Annually	14
	28	Total FAN project capital spend to-date vs. total FAN project capital budget		Annually	14
	29	Total AMI project O&M spend to-date vs. total AMI project O&M budget		Annually	14
	30	Total FAN project O&M spend to-date vs. total FAN project O&M budget		Annually	14
	31	Avoided O&M meter reading costs	Reduction in O&M paid for AMR meter reading services. <sup>4</sup>	Annually	<i>New</i>

<sup>4</sup> The benefit for Avoided O&M Meter Reading Costs in the CBA is an approximated avoided drive-by meter reading cost, which provided a comparison point for the selected AMI. Ongoing, the measurable Avoided O&M Meter Reading Costs is the reduction in O&M payments to the Company's current meter reading services provider under the existing contract based on replacement of the current AMR meters with AMI meters.

**Table 2: Proposed Post-Deployment Reporting**

Category	Item No.	Item/Definition	Calculation/Notes <sup>5</sup>	Reporting Frequency	TCR Attachment 4 Table
Customer	1	Percentage of customers with an AMI meter that receive estimated bills	Estimated bill trends pre/post AMI installation for AMI/Non-AMI-based bills.	Quarterly	15
	2	Percentage of customers with an AMI meter that have made a complaint of inaccurate meter readings	Percentage of customers with AMI that have made a complaint about inaccurate billing.**	Quarterly	15
	3	Percentage of customers with an AMI meter at least 30 days that are targeted with energy savings messaging	Monthly count of customers with AMI meters with targeted messaging in last 30 days.**	Quarterly	16
	4	Percentage of low-income customers with an AMI meter at least 30 days that are targeted with energy savings messaging	Monthly count of LIHEAP customers with AMI meters with targeted messaging in last 30 days.**	Quarterly	16
	5	Number of customers with an AMI meter with an active web portal (My Account) account	Count of customers that activate My Account post-AMI install. Activated is defined as within last 90 days.**	Quarterly	15
	6	Number of monthly, unique visits to the web portal (My Account)	Count of customers with an AMI meter that visit My Account.**	Quarterly	15
	7	Percentage of customers with an AMI meter with Home Area Network (HAN) functionality	AMI customers with HAN function enabled / Total customers with AMI.**	Quarterly	15
	8	Number of customers with an AMI meter with Home Area Network (HAN) functionality	Count of AMI customers with HAN enabled.**	Quarterly	15

<sup>5</sup> One asterisk (\*) denotes that the CBA includes a corresponding benefit value, to be provided in reporting as a comparison point. Two asterisks (\*\*) denotes items that are included in both deployment and post-deployment reporting.

Category	Item No.	Item/Definition	Calculation/Notes <sup>5</sup>	Reporting Frequency	TCR Attachment 4 Table
Customer	9	Percent of customers with an AMI meter with Green Button Connect My Data (CMD) functionality	Customers enrolled in CMD / total customers.** <i>Note: All customers will have CMD functionality.</i>	Quarterly	15
	10	Number of customers with an AMI meter with Green Button Connect My Data (CMD) functionality	Count of customers enrolling in CMD in previous 90 days.** <i>Note: All customers will have CMD functionality.</i>	Quarterly	15
	11	Survey of customer satisfaction with outage related communications	Existing outage satisfaction survey.	Annually	15
Metering	12	AMI meter failure rate <sup>6</sup>	Number of failed AMI meters to-date / Total AMI meters deployed to-date.	Annually	18
	13	Meter accuracy test percentage	Results of Random and Periodic tests of installed AMI meters	Annually	15
	14	Percentage of interval reads received	Interval reads received/total interval reads expected	Annually	15
Financials and Efficiencies	15	Number of avoided truck rolls/field visits	Total truck rolls pre- and post-AMI deployment <i>Note: discussion may be necessary to determine avoided rolls due to AMI.</i>	Annually	15
	16	O&M cost savings from avoided field visits <sup>7</sup>	Estimated O&M of reduced truck rolls* <i>Note: discussion may be necessary to determine avoided rolls due to AMI.</i>	Annually	14 and 18
Financials	17	O&M – Annual trips for residential manual disconnection	Estimated O&M based on average cost per trip.*	Annually	18

<sup>6</sup> In Attachment 4 of the TCR Petition, this item was described as: “Capital – AMI meter failure rate (avoided meter purchases)”. We propose to report on this not as a capital benefit but as a percentage, which we understand to be consistent with Fresh Energy’s recommendation in its September 25, 2020 Comments in Docket No. E999/CI-20-627. This is also consistent with the CBA, in which the assumed meter failure rate is not itself considered a benefit but rather a general parameter, which we would reference as a comparison point in our reporting.

<sup>7</sup> This item encompasses the following items from Attachment 4, Table 18: (1) O&M – Annual trips for damaged customer equipment; (2) O&M – Annual “OK for Arrival” field visits; and (3) O&M – Annual voltage investigation field visits. Consistent with the notes provided in Attachment 4, Table 18, we intend to report these O&M cost savings from avoided field visits in aggregate. Similarly, for the comparison point included in reporting, we intend to aggregate the avoided field visit benefit values used the CBA. Regarding annual trips for damaged customer equipment, we note that our annual Service Quality report (most recently in Docket No. E002/M-22-162) includes information on customer damage claims paid.

Category	Item No.	Item/Definition	Calculation/Notes <sup>5</sup>	Reporting Frequency	TCR Attachment 4 Table
	18	O&M – Annual trips for residential manual reconnection	Estimated O&M based on average cost per trip.*	Annually	18
	19	Cost of consumption on inactive meters	Reduction in unbilled energy usage on meters not assigned to a billing account.*	Annually	19

## CERTIFICATE OF SERVICE

I, Joshua DePauw, 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.        E002/M-20-680  
                          E002/M-21-694**

Dated this 16<sup>th</sup> day of November 2022

/s/

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Joshua DePauw  
Regulatory Administrator

[illegible]

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_20-680_Official
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_20-680_Official
William	Black	bblack@mmua.org	MMUA	Suite 200 3131 Fernbrook Lane North  Plymouth, MN 55447	Electronic Service	No	OFF_SL_20-680_Official
Kenneth	Bradley	kbradley1965@gmail.com		2837 Emerson Ave S Apt CW112  Minneapolis, MN 55408	Electronic Service	No	OFF_SL_20-680_Official
Elizabeth	Brama	ebrama@taftlaw.com	Taft Stettinius & Hollister LLP	2200 IDS Center 80 South 8th Street Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-680_Official
Jon	Brekke	jbrekke@grenergy.com	Great River Energy	12300 Elm Creek Boulevard  Maple Grove, MN 553694718	Electronic Service	No	OFF_SL_20-680_Official
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_20-680_Official
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_20-680_Official
Christina	Brusven	cbrusven@fredlaw.com	Fredrikson Byron	200 S 6th St Ste 4000  Minneapolis, MN 554021425	Electronic Service	No	OFF_SL_20-680_Official



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_20-680_Official
LORI	CLOBES	lclobes@mienergy.coop	MiEnergy Cooperative	31110 COOPERATIVE WAY PO BOX 626 RUSHFORD, MN 55971	Electronic Service	No	OFF_SL_20-680_Official
Douglas M.	Carnival	dmc@mcgrannshea.com	McGrann Shea Carnival Straughn & Lamb	N/A	Electronic Service	No	OFF_SL_20-680_Official
Ray	Choquette	rchoquette@agp.com	Ag Processing Inc.	12700 West Dodge Road PO Box 2047 Omaha, NE 68103-2047	Electronic Service	No	OFF_SL_20-680_Official
John	Coffman	john@johncoffman.net	AARP	871 Tuxedo Blvd.  St, Louis, MO 63119-2044	Electronic Service	No	OFF_SL_20-680_Official
Kenneth A.	Colburn	kcolburn@symbioticstrategies.com	Symbiotic Strategies, LLC	26 Winton Road  Meredith, NH 32535413	Electronic Service	No	OFF_SL_20-680_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_20-680_Official
Riley	Conlin	riley.conlin@stoel.com	Stoel Rives LLP	33 S. 6th Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-680_Official
Brooke	Cooper	bcooper@allete.com	Minnesota Power	30 W Superior St  Duluth, MN 558022191	Electronic Service	No	OFF_SL_20-680_Official
George	Crocker	gwillc@nawo.org	North American Water Office	PO Box 174  Lake Elmo, MN 55042	Electronic Service	No	OFF_SL_20-680_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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_20-680_Official
James	Denniston	james.r.denniston@xcenergy.com	Xcel Energy Services, Inc.	414 Nicollet Mall, 401-8  Minneapolis, MN 55401	Electronic Service	No	OFF_SL_20-680_Official
Curt	Dieren	curt.dieren@dgr.com	L&O Power Cooperative	1302 S Union St  Rock Rapids, IA 51246	Electronic Service	No	OFF_SL_20-680_Official
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_20-680_Official
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_20-680_Official
Brian	Edstrom	briane@cubminnesota.org	Citizens Utility Board of Minnesota	332 Minnesota St Ste W1360 Saint Paul, MN 55101	Electronic Service	No	OFF_SL_20-680_Official
Kristen	Eide Tollefson	healingsystems69@gmail.com	R-CURE	28477 N Lake Ave  Frontenac, MN 55026-1044	Electronic Service	No	OFF_SL_20-680_Official
Rebecca	Eilers	rebecca.d.eilers@xcelenergy.com	Xcel Energy	414 Nicollet Mall - 401 7th Floor  Minneapolis, MN 55401	Electronic Service	No	OFF_SL_20-680_Official
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_20-680_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Betsy	Engelking	betsy@nationalgridrenewables.com	Geronimo Energy, LLC	8400 Normandale Lake Blvd Ste 1200 Bloomington, MN 55437	Electronic Service	No	OFF_SL_20-680_Official
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_20-680_Official
James C.	Erickson	jericksonkbc@gmail.com	Kelly Bay Consulting	17 Quechee St  Superior, WI 54880-4421	Electronic Service	No	OFF_SL_20-680_Official
Catherine	Fair	catherine@energycents.org	Energy CENTS Coalition	823 E 7th St  St Paul, MN 55106	Electronic Service	No	OFF_SL_20-680_Official
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_20-680_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_20-680_Official
Lucas	Franco	lfranco@liunagroc.com	LIUNA	81 Little Canada Rd E  Little Canada, MN 55117	Electronic Service	No	OFF_SL_20-680_Official
Nathan	Franzen	nathan@nationalgridrenewables.com	Geronimo Energy, LLC	8400 Normandale Lake Blvd Ste 1200 Bloomington, MN 55437	Electronic Service	No	OFF_SL_20-680_Official
Hal	Galvin	halgalvin@comcast.net	Provectus Energy Development llc	1936 Kenwood Parkway  Minneapolis, MN 55405	Electronic Service	No	OFF_SL_20-680_Official

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_20-680_Official
Edward	Garvey	garveyed@aol.com	Residence	32 Lawton St  Saint Paul, MN 55102	Electronic Service	No	OFF_SL_20-680_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_20-680_Official
Allen	Gleckner	gleckner@fresh-energy.org	Fresh Energy	408 St. Peter Street Ste 350 Saint Paul, Minnesota 55102	Electronic Service	No	OFF_SL_20-680_Official
Jenny	Glumack	jenny@mrea.org	Minnesota Rural Electric Association	11640 73rd Ave N  Maple Grove, MN 55369	Electronic Service	No	OFF_SL_20-680_Official
Tony	Hainault	anthony.hainault@co.hennepin.mn.us	Hennepin County DES	701 4th Ave S Ste 700  Minneapolis, MN 55415-1842	Paper Service	No	OFF_SL_20-680_Official
Kim	Havey	kim.havey@minneapolismn.gov	City of Minneapolis	350 South 5th Street, Suite 315M Minneapolis, MN 55415	Electronic Service	No	OFF_SL_20-680_Official
Todd	Headlee	theadlee@dvigridsolutions.com	Dominion Voltage, Inc.	701 E. Cary Street  Richmond, VA 23219	Electronic Service	No	OFF_SL_20-680_Official
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_20-680_Official
Adam	Heinen	aheinen@dakotaelectric.com	Dakota Electric Association	4300 220th St W  Farmington, MN 55024	Electronic Service	No	OFF_SL_20-680_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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_20-680_Official
Annete	Henkel	mui@mnuilityinvestors.org	Minnesota Utility Investors	413 Wacouta Street #230 St. Paul, MN 55101	Electronic Service	No	OFF_SL_20-680_Official
Joe	Hoffman	ja.hoffman@smmpa.org	SMMPA	500 First Ave SW  Rochester, MN 55902-3303	Electronic Service	No	OFF_SL_20-680_Official
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_20-680_Official
Jan	Hubbard	jan.hubbard@comcast.net		7730 Mississippi Lane  Brooklyn Park, MN 55444	Electronic Service	No	OFF_SL_20-680_Official
Geoffrey	Inge	ginge@regintl.com	Regulatory Intelligence LLC	PO Box 270636  Superior, CO 80027-9998	Electronic Service	No	OFF_SL_20-680_Official
Casey	Jacobson	cjacobson@bepc.com	Basin Electric Power Cooperative	1717 East Interstate Avenue  Bismarck, ND 58501	Electronic Service	No	OFF_SL_20-680_Official
Ralph	Jacobson	ralphj@ips-solar.com		2126 Roblyn Avenue  Saint Paul, Minnesota 55104	Electronic Service	No	OFF_SL_20-680_Official
John S.	Jaffray	jjaffray@jjrpower.com	JJR Power	350 Highway 7 Suite 236  Excelsior, MN 55331	Electronic Service	No	OFF_SL_20-680_Official
Alan	Jenkins	aj@jenkinsatlaw.com	Jenkins at Law	2950 Yellowtail Ave.  Marathon, FL 33050	Electronic Service	No	OFF_SL_20-680_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Richard	Johnson	Rick.Johnson@lawmoss.com	Moss & Barnett	150 S. 5th Street Suite 1200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-680_Official
Sarah	Johnson Phillips	sarah.phillips@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-680_Official
Nate	Jones	njones@hcpd.com	Heartland Consumers Power	PO Box 248  Madison, SD 57042	Electronic Service	No	OFF_SL_20-680_Official
Michael	Kampmeyer	mkampmeyer@a-e-group.com	AEG Group, LLC	260 Salem Church Road  Sunfish Lake, Minnesota 55118	Electronic Service	No	OFF_SL_20-680_Official
Nick	Kaneski	nick.kaneski@enbridge.com	Enbridge Energy Company, Inc.	11 East Superior St Ste 125  Duluth, MN 55802	Electronic Service	No	OFF_SL_20-680_Official
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_20-680_Official
Chris	Kopel	chrisk@CMPASgroup.org	Central Minnesota Municipal Power Agency	459 S Grove St  Blue Earth, MN 56013-2629	Paper Service	No	OFF_SL_20-680_Official
Brian	Krambeer	bkrambeer@mienergy.com	MiEnergy Cooperative	PO Box 626 31110 Cooperative Way Rushford, MN 55971	Electronic Service	No	OFF_SL_20-680_Official
Michael	Krause	michaelkrause61@yahoo.com	Kandiyo Consulting, LLC	433 S 7th Street Suite 2025 Minneapolis, Minnesota 55415	Electronic Service	No	OFF_SL_20-680_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Michael	Krikava	mkrikava@taftlaw.com	Taft Stettinius & Hollister LLP	2200 IDS Center 80 S 8th St Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-680_Official
Matthew	Lacey	Mlacey@greenergy.com	Great River Energy	12300 Elm Creek Boulevard  Maple Grove, MN 553694718	Electronic Service	No	OFF_SL_20-680_Official
Carmel	Laney	carmel.laney@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-680_Official
Peder	Larson	plarson@larkinhoffman.com	Larkin Hoffman Daly & Lindgren, Ltd.	8300 Norman Center Drive Suite 1000 Bloomington, MN 55437	Electronic Service	No	OFF_SL_20-680_Official
James D.	Larson	james.larson@avantenergy.com	Avant Energy Services	220 S 6th St Ste 1300  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-680_Official
Dean	Leischow	dean@sunrisenrg.com	Sunrise Energy Ventures	315 Manitoba Ave Ste 200  Wayzata, MN 55391	Electronic Service	No	OFF_SL_20-680_Official
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_20-680_Official
Ryan	Long	ryan.j.long@xcelenergy.com	Xcel Energy	414 Nicollet Mall 401 8th Floor Minneapolis, MN 55401	Electronic Service	No	OFF_SL_20-680_Official
Susan	Ludwig	sludwig@mnpower.com	Minnesota Power	30 West Superior Street  Duluth, MN 55802	Electronic Service	No	OFF_SL_20-680_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Kavita	Maini	kmaini@wi.rr.com	KM Energy Consulting, LLC	961 N Lost Woods Rd Oconomowoc, WI 53066	Electronic Service	No	OFF_SL_20-680_Official
Mary	Martinka	mary.a.martinka@xcelenergy.com	Xcel Energy Inc	414 Nicollet Mall 7th Floor Minneapolis, MN 55401	Electronic Service	No	OFF_SL_20-680_Official
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_20-680_Official
Gregg	Mast	gmast@cleanenergyeconmymn.org	Clean Energy Economy Minnesota	4808 10th Avenue S Minneapolis, MN 55417	Electronic Service	No	OFF_SL_20-680_Official
Dave	McNary	David.McNary@hennepin.us	Hennepin County DES	701 Fourth Ave S Ste 700 Minneapolis, MN 55415-1842	Electronic Service	No	OFF_SL_20-680_Official
Thomas	Melone	Thomas.Melone@AllcoUS.com	Minnesota Go Solar LLC	222 South 9th Street Suite 1600 Minneapolis, Minnesota 55120	Electronic Service	No	OFF_SL_20-680_Official
Brian	Meloy	brian.meloy@stinson.com	STINSON LLP	50 S 6th St Ste 2600 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-680_Official
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_20-680_Official
Stacy	Miller	stacy.miller@minneapolismn.gov	City of Minneapolis	350 S. 5th Street Room M 301 Minneapolis, MN 55415	Electronic Service	No	OFF_SL_20-680_Official
David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022093	Electronic Service	No	OFF_SL_20-680_Official



First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Dalene	Monsebroten	dalene.monsebroten@nmpagency.com	Northern Municipal Power Agency	123 2nd St W Thief River Falls, MN 56701	Electronic Service	No	OFF_SL_20-680_Official
Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP	33 South Sixth St Ste 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-680_Official
Ben	Nelson	benn@cmpasgroup.org	CMPMA	459 South Grove Street Blue Earth, MN 56013	Electronic Service	No	OFF_SL_20-680_Official
Carl	Nelson	cnelson@mncee.org	Center for Energy and Environment	212 3rd Ave N Ste 560 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_20-680_Official
Dale	Niezwaag	dniezwaag@bepc.com	Basin Electric Power Cooperative	1717 East Interstate Avenue Bismarck, ND 58503	Electronic Service	No	OFF_SL_20-680_Official
David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency	220 South Sixth Street Suite 1300 Minneapolis, Minnesota 55402	Electronic Service	No	OFF_SL_20-680_Official
Sephra	Ninow	sephra.ninow@energycenter.org	Center for Sustainable Energy	426 17th Street, Suite 700 Oakland, CA 94612	Electronic Service	No	OFF_SL_20-680_Official
Rolf	Nordstrom	rnordstrom@gpisd.net	Great Plains Institute	2801 21ST AVE S STE 220 Minneapolis, MN 55407-1229	Electronic Service	No	OFF_SL_20-680_Official
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_20-680_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
David	O'Brien	david.obrien@navigant.com	Navigant Consulting	77 South Bedford St Ste 400  Burlington, MA 01803	Electronic Service	No	OFF_SL_20-680_Official
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_20-680_Official
Russell	Olson	rolson@hcpd.com	Heartland Consumers Power District	PO Box 248  Madison, SD 570420248	Electronic Service	No	OFF_SL_20-680_Official
Carol A.	Overland	overland@legalelectric.org	Legalelectric - Overland Law Office	1110 West Avenue  Red Wing, MN 55066	Electronic Service	No	OFF_SL_20-680_Official
Dan	Patry	dpatry@sunedison.com	SunEdison	600 Clipper Drive  Belmont, CA 94002	Electronic Service	No	OFF_SL_20-680_Official
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_20-680_Official
Jennifer	Peterson	jjpeterson@mnpower.com	Minnesota Power	30 West Superior Street  Duluth, MN 55802	Electronic Service	No	OFF_SL_20-680_Official
Hannah	Polikov	hpolikov@aee.net	Advanced Energy Economy Institute	1000 Vermont Ave, Third Floor  Washington, DC 20005	Electronic Service	No	OFF_SL_20-680_Official
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_20-680_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Mark	Rathbun	mrathbun@greenergy.com	Great River Energy	12300 Elm Creek Blvd  Maple Grove, MN 55369	Electronic Service	No	OFF_SL_20-680_Official
Michael	Reinertson	michael.reinertson@avante nergy.com	Avant Energy	220 S. Sixth St. Ste 1300  Minneapolis, Minnesota 55402	Electronic Service	No	OFF_SL_20-680_Official
John C.	Reinhardt	N/A	Laura A. Reinhardt	3552 26th Ave S  Minneapolis, MN 55406	Paper Service	No	OFF_SL_20-680_Official
Generic Notice	Residential Utilities Division	residential.utilities@ag.stat e.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_20-680_Official
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_20-680_Official
Isabel	Ricker	ricker@fresh-energy.org	Fresh Energy	408 Saint Peter Street Suite 220 Saint Paul, MN 55102	Electronic Service	No	OFF_SL_20-680_Official
Amanda	Rome	amanda.rome@xcelenergy. com	Xcel Energy	414 Nicollet Mall FL 5  Minneapolis, MN 55401	Electronic Service	No	OFF_SL_20-680_Official
Robert K.	Sahr	bsahr@eastriver.coop	East River Electric Power Cooperative	P.O. Box 227  Madison, SD 57042	Electronic Service	No	OFF_SL_20-680_Official
Richard	Savelkoul	rsavelkoul@martinsquires.c om	Martin & Squires, P.A.	332 Minnesota Street Ste W2750  St. Paul, MN 55101	Electronic Service	No	OFF_SL_20-680_Official
Thomas	Scharff	thomas.scharff@versoco.c om	Verso Corp	600 High Street  Wisconsin Rapids, WI 54495	Electronic Service	No	OFF_SL_20-680_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Kay	Schraeder	kschraeder@minnkota.com	Minnkota Power	5301 32nd Ave S Grand Forks, ND 58201	Electronic Service	No	OFF_SL_20-680_Official
Christine	Schwartz	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	Yes	OFF_SL_20-680_Official
Dean	Sedgwick	Sedgwick@ItascaPower.com	Itasca Power Company	PO Box 455 Spring Lake, MN 56680	Electronic Service	No	OFF_SL_20-680_Official
Maria	Seidler	maria.seidler@dom.com	Dominion Energy Technology	120 Tredegar Street Richmond, Virginia 23219	Electronic Service	No	OFF_SL_20-680_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_20-680_Official
Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates	7400 Lyndale Ave S Ste 190 Richfield, MN 55423	Electronic Service	Yes	OFF_SL_20-680_Official
Patricia F	Sharkey	psharkey@environmentalawcounsel.com	Midwest Cogeneration Association.	180 N LaSalle St Ste 3700 Chicago, IL 60601	Electronic Service	No	OFF_SL_20-680_Official
Bria	Shea	bria.e.shea@xcelenergy.com	Xcel Energy	414 Nicollet Mall Minneapolis, MN 55401	Electronic Service	No	OFF_SL_20-680_Official
Doug	Shoemaker	dougs@charter.net	Minnesota Renewable Energy	2928 5th Ave S Minneapolis, MN 55408	Electronic Service	No	OFF_SL_20-680_Official
Anne	Smart	anne.smart@chargepoint.com	ChargePoint, Inc.	254 E Hacienda Ave Campbell, CA 95008	Electronic Service	No	OFF_SL_20-680_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.	76 W Kellogg Blvd  St. Paul, MN 55102	Electronic Service	No	OFF_SL_20-680_Official
Trevor	Smith	trevor.smith@avantenergy.com	Avant Energy, Inc.	220 South Sixth Street Suite 1300 Minneapolis, Minnesota 55402	Electronic Service	No	OFF_SL_20-680_Official
Joshua	Smith	joshua.smith@sierraclub.org		85 Second St FL 2  San Francisco, California 94105	Electronic Service	No	OFF_SL_20-680_Official
Ken	Smith	ken.smith@ever-greenenergy.com	Ever Green Energy	305 Saint Peter St  Saint Paul, MN 55102	Electronic Service	No	OFF_SL_20-680_Official
Beth H.	Soholt	bsoholt@windonthewires.org	Wind on the Wires	570 Asbury Street Suite 201  St. Paul, MN 55104	Electronic Service	No	OFF_SL_20-680_Official
Ralph J	Solar Consulting	N/A	IPS Solar	821 Raymond Ave Ste. 400 St. Paul, MN 55114	Paper Service	No	OFF_SL_20-680_Official
Sky	Stanfield	stanfield@smwlaw.com	Shute, Mihaly & Weinberger	396 Hayes Street  San Francisco, CA 94102	Electronic Service	No	OFF_SL_20-680_Official
Tom	Stanton	tstanton@nrri.org	NRRI	1080 Carmack Road  Columbus, OH 43210	Electronic Service	No	OFF_SL_20-680_Official
Byron E.	Starns	byron.starns@stinson.com	STINSON LLP	50 S 6th St Ste 2600  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-680_Official
James M	Strommen	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered	150 S 5th St Ste 700  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-680_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Eric	Swanson	eswanson@winthrop.com	Winthrop & Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_20-680_Official
Peter	Teigland	pteigland@mnseia.org	Minnesota Solar Energy Industries Association	2288 University Ave W  Saint Paul, MN 55114	Electronic Service	No	OFF_SL_20-680_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_20-680_Official
Pat	Treseler	pat.jclaw@comcast.net	Paulson Law Office LTD	4445 W 77th Street Suite 224 Edina, MN 55435	Electronic Service	No	OFF_SL_20-680_Official
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_20-680_Official
Karen	Turnboom	karen.turnboom@versoco.com	Verso Corporation	100 Central Avenue  Duluth, MN 55807	Paper Service	No	OFF_SL_20-680_Official
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_20-680_Official
Curt	Volkman	curt@newenergy-advisors.com	Fresh Energy	408 St Peter St  Saint Paul, MN 55102	Electronic Service	No	OFF_SL_20-680_Official
Roger	Warehime	roger.warehime@owatonnautilities.com	Owatonna Municipal Public Utilities	208 S Walnut Ave PO BOX 800 Owatonna, MN 55060	Electronic Service	No	OFF_SL_20-680_Official
Jenna	Warmuth	jwarmuth@mnpower.com	Minnesota Power	30 W Superior St  Duluth, MN 55802-2093	Electronic Service	No	OFF_SL_20-680_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Samantha	Williams	swilliams@nrdc.org	Natural Resources Defense Council	20 N. Wacker Drive Ste 1600 Chicago, IL 60606	Electronic Service	No	OFF_SL_20-680_Official
Joseph	Windler	jwindler@winthrop.com	Winthrop & Weinstine	225 South Sixth Street, Suite 3500  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-680_Official
Robyn	Woeste	robynwoeste@alliantenergy.com	Interstate Power and Light Company	200 First St SE  Cedar Rapids, IA 52401	Electronic Service	No	OFF_SL_20-680_Official
Yochi	Zakai	yzakai@smwlaw.com	SHUTE, MIHALY & WEINBERGER LLP	396 Hayes Street  San Francisco, CA 94102	Electronic Service	No	OFF_SL_20-680_Official
Christopher	Zibart	czibart@atcllc.com	American Transmission Company LLC	W234 N2000 Ridgeview Pkwy Court  Waukesha, WI 53188-1022	Electronic Service	No	OFF_SL_20-680_Official
Kurt	Zimmerman	kwz@ibew160.org	Local Union #160, IBEW	2909 Anthony Ln  St Anthony Village, MN 55418-3238	Electronic Service	No	OFF_SL_20-680_Official
Patrick	Zomer	Pat.Zomer@lawmoss.com	Moss & Barnett PA	150 S 5th St #1200  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-680_Official

[illegible]



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@allte.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
Brandon	Crawford	brandonc@cubminnesota.org	Citizens Utility Board of Minnesota	332 Minnesota St Ste W1360  St. Paul, MN 55101	Electronic Service	No	OFF_SL_21-814_M-21-814
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@xcenergy.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

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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
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
Catherine	Fair	catherine@energycents.org	Energy CENTS Coalition	823 E 7th St  St Paul, MN 55106	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

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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
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
Tony	Hainault	anthony.hainault@co.hennepin.mn.us	Hennepin County DES	701 4th Ave S Ste 700  Minneapolis, MN 55415-1842	Paper 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

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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@dvigridsolutions.com	Dominion Voltage, Inc.	701 E. Cary Street  Richmond, VA 23219	Electronic Service	No	OFF_SL_21-814_M-21-814
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@mutilityinvestors.org	Minnesota Utility Investors	413 Wacouta Street #230 St. Paul, MN 55101	Electronic Service	No	OFF_SL_21-814_M-21-814
Holly	Hinman	holly.r.hinman@xcelenergy.com	Xcel Energy	414 Nicollet Mall, 7th Floor  Minneapolis, MN 55401	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

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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
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

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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
Chris	Kopel	chrisk@CMPASgroup.org	Central Minnesota Municipal Power Agency	459 S Grove St  Blue Earth, MN 56013-2629	Paper 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@grenergy.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
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



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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
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
Annie	Levenson Falk	annielf@cubminnesota.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
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

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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
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@bepc.com	Basin Electric Power Cooperative	1717 East Interstate Avenue  Bismarck, ND 58503	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
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
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@legalelectric.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

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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
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@avante nergy.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.stat e.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_21-814_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

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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
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
Christine	Schwartz	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	Yes	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 Pl E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-814_M-21-814

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Patricia F	Sharkey	psharkey@environmentallawcounsel.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
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
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
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
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
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
Ralph J	Solar Consulting	N/A	IPS Solar	821 Raymond Ave Ste. 400 St. Paul, MN 55114	Paper Service	No	OFF_SL_21-814_M-21-814

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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
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
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@versoco.com	Verso Corporation	100 Central Avenue Duluth, MN 55807	Paper Service	No	OFF_SL_21-814_M-21-814

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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 Pkwy 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
Kurt	Zimmerman	kwz@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
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