



414 Nicollet Mall
Minneapolis, MN 55401

October 30, 2020

—Via Electronic Filing—

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

RE: REPLY COMMENTS
STAKEHOLDER PROCESS INFORMING REPORT, XCEL ENERGY 2019
INTEGRATED DISTRIBUTION PLAN, AND XCEL ENERGY TRANSMISSION
COST RECOVERY RIDER
DOCKET NOS. E999/DI-20- 627, E002/M-19-666, E002/M-20-680

Dear Mr. Seuffert:

Northern States Power Company, doing business as Xcel Energy, submits to the Minnesota Public Utilities Commission the enclosed Reply Comments in response to the Comments filed by parties on October 16, 2020 in the above-referenced dockets.

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 Jody Londo at jody.l.londo@xcelenergy.com or (612) 330-5601 or me at bria.e.shea@xcelenergy.com or (612) 330-6064 if you have any questions regarding this filing.

Sincerely,

/s/

BRIA E. SHEA
DIRECTOR, REGULATORY & STRATEGIC ANALYSIS

Enclosures
c: Service Lists

STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION

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

IN THE MATTER OF THE DISTRIBUTION
SYSTEM PLANNING FOR XCEL ENERGY

DOCKET NO. E002/M-19-666

IN THE MATTER OF THE DEPARTMENT
STAKEHOLDER PROCESS INFORMING THE
REPORT ON THE METRICS, PERFORMANCE
EVALUATION METHOD, AND CONSUMER
PROTECTION CONDITIONS TO BE APPLIED
TO XCEL ENERGY'S ADVANCED
METERING INFRASTRUCTURE AND FIELD
AREA NETWORK PROJECTS CERTIFIED IN
DOCKET NO. E002/M-19-666

DOCKET NO. E002/DI-20-627

IN THE MATTER OF THE PETITION OF
NORTHERN STATES POWER COMPANY FOR
APPROVAL OF THE TRANSMISSION COST
RECOVERY RIDER REVENUE
REQUIREMENTS FOR 2021, 2020 TRACKER
TRUE-UP, 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 these Reply Comments in response to the Comments filed by parties on October 16, 2020 in the above-referenced dockets.

The Company's Advanced Grid Intelligence and Security (AGIS) initiative is our long-term strategic plan to transform the electric distribution system to update system technology and capabilities, meet changing customer demands, enhance transparency

into distribution system data, promote efficiency and reliability, and safely integrate more distributed resources. Advanced Metering Infrastructure (AMI) and a Field Area Network (FAN) are foundational components of this strategy. The timing of these investments is driven by the need to replace our currently obsolete automated meter reading system – and to seize that opportunity and create additional value for our customers.

The Commission’s certification of AMI and FAN recognized them as core components of the Company’s AGIS initiative and necessary for modernizing the distribution system and enhancing reliability, improving security, and increasing energy conservation opportunities. The Commission’s July 23, 2020 Order specifically observed that they are technologies that “[facilitate] communication between the utility and its customers through the use of two-way meters, a category explicitly included in Minn. Stat. § 216B.2425, subd. 2.” The Order also recognized the increasing importance of the Company’s ability to shape and shift load through advanced rates and other demand response methods to help reduce system costs and give customers more control over their energy consumption.¹

The Department of Commerce, the Office of the Attorney General, the Citizens Utility Board, and the Xcel Large Industrials (XLI) submitted comments in the above-referenced dockets, responding to the Company’s proposed procedural path for cost recovery of the AMI and FAN investments through the Transmission Cost Recovery rider, and they generally recommended this matter be referred to the Office of Administrative Hearings (OAH) for a contested case. We disagree with this recommendation.

We do, however, recognize that the procedural paths we proposed are not the only way to approach reviewing a cost-recovery proposal related to these investments; and we agree that the issues are complex and that the investments are novel for Minnesota. As such, we are open to—and already have participated in—a variety of proceedings related to these investments. We initially proposed these investments a year ago, and beginning even before that time, we held and participated in numerous stakeholder workshops related to these matters, and we are happy to participate in more. We are happy to engage in a proceeding with a timeline that is longer than provided by the Commission’s Rules for miscellaneous matters. We are also happy to conduct technical conferences to help parties understand what we have proposed – and to participate in public meetings as suggested by the OAG. Finally, we fully expect to work with the Commission to establish reasonable metrics and performance reporting. However, we do not see value in—nor do we believe parties have

¹ See Order at pages 14-15.

identified a need for—a contested case related to these investments under Minn. R. 7829.1000. Instead, we believe it is reasonable, appropriate, and practicable to rely on existing Commission protocols and procedure to assess the prudence of our AMI and FAN investments.

Some parties also indicated the desire for us to articulate all possible capabilities of the advanced meters at the outset, or all possible ways the advanced meters might be leveraged to create customer value in order to assess prudence. And similarly, that we should provide a definitive timeline for all possible customer programs, services, or achievement of all Company operational efficiencies. Given that we essentially will be deploying computers with each of our meters, knowing the full extent of their capabilities at the outset is impossible.

That said, we have committed that we will leverage the AMI and FAN investments at all possible opportunities to maximize customer and system value, and we demonstrated this commitment through the Customer Strategy provided with our certification request, which describes our multi-year initiative to transform the customer experience – and more specifically, it also outlines our advanced grid strategy as it relates to the products, services and journeys we envision for our customers.²

We recognize there will be a performance aspect to our AMI and FAN cost recovery – some of which may be related to future capabilities or services. However, cost recovery of our investments should not be fully dependent on achievement of immediate or longer-term metrics. This would set an unprecedented bar for cost recovery, and moreover, be inconsistent with the Commission’s apparent intent when issuing the Order certifying the Company’s AMI and FAN investments.

Finally, as also discussed in our October 30, 2020 Reply Comments Docket Nos. E999/CI-20-492, E,G002/M-20-716, E002/M-20-743, we acknowledge there are many active dockets right now and a lot of review work underway for our regulators and stakeholders. We are appreciative of the significant time and engagement from so many parties. And while much of this work is the result of our efforts to drive economic relief and bring jobs to the region, this does not relieve the reality of the workload and complexity of the interrelated regulatory dockets. In an effort to alleviate some of the workload surrounding the instant dockets, we plan to delay our Transmission Cost Recovery (TCR) Rider filing previously planned for early November. To be clear, we do still plan to seek recovery of the costs for 2020,

² See Xcel Energy 2019 Integrated Distribution Plan, Attachment M1 (Schedule 3), Docket No. E002/M-19-666 (November 1, 2019).

however, in light of the expected timeline for review and the other ongoing regulatory work, we think this is one filing and regulatory request the Company can delay.

We look forward to further guidance from the Commission on the procedural process, and metrics and performance reporting for our AMI and FAN investments.

REPLY COMMENTS

As discussed in our 2019 Integrated Distribution Plan, investments in advanced metering infrastructure (AMI) and field area network (FAN) are in the public interest. These are the right technologies at the right time for Minnesota. The Commission's Order certified AMI and FAN as core components of the Company's Advanced Grid Intelligence and Security (AGIS) initiative, thereby authorizing the Company to seek cost recovery for the investments through the TCR rider.

The Company's investment in AMI and FAN, however, represents a substantial change in not only the type and volume of data we are able to collect from meters, but also our capabilities related to the use of meter data. Recognizing this, the Commission ordered (1) the Company to propose a procedural path for cost recovery related to the investments, and (2) the Department to develop recommendations on specific metrics, detailed methods for evaluating performance, and consumer protections or other conditions, including cost caps, that should be applied to the certified projects, informed by a stakeholder process in which the Company participated. On August 28, the Company filed our proposed procedural paths, and the Department is now holding the stakeholder workshops it will use to develop its recommendations. Notwithstanding that this process is ongoing, parties have filed comments on not only the procedural path for considering our investments in the TCR, but also metrics, performance evaluations, and consumer protections. We address these in turn below.

I. PROCEDURAL PROCESS

The parties who commented on the Company's proposed procedural paths broadly criticized the approach recommended by the Company, and instead they recommend a contested case proceeding. They argue a contested case is needed because the investments are significant and because the stakeholders want to ensure customers are receiving appropriate benefits for the costs incurred. We share these concerns, but they do not require a contested case to resolve. Parties have identified no contested material facts for an ALJ to address nor any reason why referral to an ALJ would otherwise improve the Commission's ability to consider the prudence of the Company's AMI and FAN investments. Alternatively, the Department recommends

an ALJ to “facilitate the process,” though the difference between this proposal and a simple contested case appears to be minimal. Therefore, as discussed below, referral for a contested case is unwarranted.

Additionally, the Department suggests there should be a completeness review of the Company’s proposed recovery of AMI and FAN investments as an interim step before referral for a contested case. This would be highly unusual for a rider proceeding, and also is unnecessary given that no party has raised any compliance issues with the extensive record already provided related to these investments.

A. A Contested Case is not Warranted

As we have stated, the parties’ recommendation for a contested case is not warranted. As a general matter, a contested case is warranted when “a proceeding involves contested material facts **and** there is a right to hearing under statute or rule[.]” Minn. R. 7829.1000 [**emphasis added**]. In this case, the Company is unaware of any applicable statute or rule providing a right to a contested case. In fact, to the contrary, the Legislature created a path for grid modernization investments certified by the Commission to be eligible for cost recovery through a Rider.

We agree the AMI and FAN investments are new for Minnesota, but they are not new in the industry. Further, legislative actions that identify and encourage investments believed to be in the public interest – including grid modernization under Minn. Stat. § 261B.2425 – are often new concepts. We agree that the issues are novel and complex. However, none of that means that referral to an ALJ for a contested case is warranted. Recovery of transmission investments through the TCR rider was also novel at one time, as were renewable investments through the Renewable Energy Standard rider – and both have complexities and at times have required resolution of contentious issues. Investments in grid modernization are just the latest type of investment to be recognized as eligible for recovery through a rider.

Referral to an ALJ can be valuable for the resolution of contested factual disputes. For example, when two experts disagree over the likely noise caused by a wind farm or the appropriate return on equity in a general rate case. Here, however, there are no disputes of fact. No doubt, parties have questions of fact related to, among other things, the capabilities of the technology the Company selected and the alternatives the Company considered. But questions of fact like these can and are commonly resolved through discovery and standard notice-and-comment procedures, and there is no reason that could not work here, too.

Suggestions that our AMI and FAN investments are too financially significant to be

properly addressed in the context of a rider proceeding without a contested case fail to recognize other significant investments that have been recovered through rate riders in the past. As discussed in our Reply Comments in Docket No. E002/M-19-666, past significant projects include the Metro Emissions Reduction Project (MERP) through the Emissions Reduction rider, CapX2020 transmission projects through the TCR rider, and numerous wind projects through the Renewable Energy Standard rider, all without being referred for contested case proceedings.

Through its actions to modify Minn. Stat. § 216B.2425 in 2015, the Legislature determined certain advanced grid investments are important to Minnesota and in the public interest – and created a path for utilities making such investments to seek expeditious cost recovery through a Rider. The Commission’s July 23, 2020 certification decision found that our AMI and FAN investments explicitly meet criteria in subd. 2(e) of the statute. One of the benefits of Rider treatment is flexibility and the ability to move with some speed to make, and bring the benefits of, investments to customers with due speed between rate cases. A protracted contested case is, therefore, contrary to the legislative intent, may serve to delay investments the Legislature and Commission have determined are important to Minnesota, and as such, would not be in the public interest. The potential timeline of such a case that the Department offers in Comments, moreover, is not up to the Department or even the Commission. While the Commission can request the Office of Administrative Hearings (OAH) to conduct a proceeding in a certain timeframe, OAH has sole discretion as to the timeline.

Finally, we note that there has been a lot of interest expressed by parties of ensuring sufficient public participation in this process. Participation in a contested case is notably more complicated than a traditional notice-and-comment proceeding for most interested stakeholders. Referral could, therefore, limit certain parties’ ability to participate, particularly those parties who do not have the resources to intervene and participate in a case referred to the OAH. This would serve to advantage stakeholders who are routinely represented by counsel before the Commission and disadvantage those who file comments or appear before the Commission without legal representation.

Although we do not believe a contested case is warranted or consistent with legislative intent, we do believe providing expanded opportunities for stakeholders to vet our cost recovery proposal is appropriate and could narrow the issues before the Commission. As such, we are open to engaging in a proceeding with a timeline that is

longer than provided by the Commission's Rules for miscellaneous matters.³ And as outlined in our August 28, 2020 procedural paths filing, we are happy to conduct technical conferences to help parties understand what we have proposed. We held several informational meetings in conjunction with our 2019 IDP and certification request, presented at the Department's October 23, 2020 Workshop, and we are also happy to participate in public meetings the Commission may want to hold, as suggested by OAG. However, a contested case to resolve yet-to-be-determined issues, or the list of "likely" issues outlined by the OAG, or because some parties may engage their own experts to evaluate the Company's proposal, is not necessary. Issues such as these are not unique to grid modernization and are routinely resolved in the form of rider proceedings or other miscellaneous matters.

B. There is no Need for an Interim Completeness Review

In addition to a contested case, the Department also proposes an interim step of a completeness review of the proposed investments as a distinct part of the procedural process. We disagree that there should be completeness review. This is neither called for by Minnesota rule or law nor needed in this case. Completeness reviews are generally prescribed by Commission Rules governing certain types of proceedings such as Integrated Resource Plans under Minn. R. 7843.0300 and biennial conservation improvement program (CIP) filings under Minn. R. 7690.0500. In some cases, such as general rate cases, the Commission's Rules also provide for challenges to completeness within a certain timeframe. Rider Petitions are classified as miscellaneous filings per Minn. R. 7829.0100, with the procedure prescribed by Minn. R. 7829.1400 and do not include a completeness process. There is nothing unique about a Rider Petition for AMI and FAN investments than any other Rider filing over time that would require the institution of a completeness process. That said, as we did with our certification request, we will submit a compliance matrix that demonstrates compliance with all of the filing requirements and those we have otherwise committed to provide. See Attachment A for the IDP Grid Modernization Content Roadmap we included with our certification request to demonstrate compliance with the requirements, as an example.

To be sure, the required information to be provided for recovery of these investments is extensive. In addition to information required by statute for cost recovery through the TCR, the Commission has established a number of requirements for advanced grid investment cost recovery requests through several Orders. In its September 27,

³ We note that several parties criticized our proposed procedural path for being too short. To be clear, although we believe these investments could be considered on such a timeline—particularly given the length of time parties have had to review the record—we are not opposed to a more expansive proceeding.

2019 Order in Docket No. E002/M-17-797, the Commission required the Company if and when it requests cost recovery for AGIS investments to include a “business case and comprehensive assessment of qualitative and quantitate^[iv]e benefits to customers, considering, at a minimum...,” then outlining an extensive list of requirements. Although the requirements are specific to cost recovery, the Company used these requirements to guide its request for certification and submitted all of the required information. We will again use these requirements as guidance in our cost recovery request in the TCR Rider. To demonstrate the extensive and thorough nature of these requirements, we provide the IDP Grid Modernization Content Roadmap from our 2019 IDP and certification request as Attachment A.

Additionally, as noted by the Department, on pages 12-13 of their Comments, the Commission also established requirements for seeking cost-recovery of AMI and FAN in the TCR Rider in its July 23, 2020 Order in Docket No. E002/M-19-666. These include filing preferred procedural paths (which already has been done); participating in the stakeholder process associated with the Department’s report on metrics, performance evaluation, and consumer protections (which has been occurring); proposing specific metrics and evaluation methods and a detailed plan describing how the Company will maximize the benefits of the AGIS investments for ratepayers; discussing mechanisms that will be employed to maximize cost reductions and minimize cost increases; and demonstrating the Company thoroughly considered the feasibility, costs, and benefits of alternatives, and that the proposed approach is preferable to alternatives. We either already complied with these requirements in our original filing for certification in Docket No. E002/M-19-666, have been complying with these requirements as noted above, or will comply with them when we seek cost recovery. In other words, most of the record on completeness already has been developed, and no party has claimed we failed to comply with any applicable order point, nor do we intend to fail to address our remaining obligations. As a result, there simply is no need for a completeness review.

Additionally, the Department’s Comments suggest that prior to conducting a review of the prudence of the costs related to AMI and FAN, there must be a determination of the project’s functionalities (need) for the Department to assess the selection of the least cost alternative to meet the need, and they propose a hybrid certification/rider process to assess the Company’s cost recovery request. We believe such a process is unnecessary and duplicative because the certification process for AMI and FAN is complete, and further – it determined the need for these investments.

As discussed at length in the 2019 IDP, in which the Commission certified AMI and FAN, the Company needs to replace its current automated meter reading system because it is obsolete. We proposed to replace it with an AMI/FAN solution that will

not only capably read the meters, but will also unlock significant customer and operational benefits as a foundational component of the Company's advanced grid strategy. Minn. Stat. § 216B.2425, subd. 2, which guides the certification process, identifies the advanced grid functionalities that are in the public interest. In certifying AMI and FAN, the Commission's Order acknowledged the AMI and FAN investments are "technologies that facilitate communication between the utility and its customers through the use of two-way meters, which is a category explicitly included in Minn. Stat. § 261B.2425, subd. 2.

The statute provides further guidance as to the public benefits such investments should achieve – namely, those that:

...modernize the transmission and distribution system **by enhancing reliability, improving security against cyber and physical threats, and by increasing energy conservation opportunities** [through the use of by facilitating communication between the utility and its customers through the use of two-way meters... **to enable demand response, and other innovative technologies**]. [emphasis added]

By certifying the projects, the Commission acknowledged the need for the Company to read customer meters, and certified the Company's proposal to do so through the use of two-way meters that enhance and enable the benefits and capabilities outlined in the statute. That certification, then, allows the Company to seek cost recovery for the investments not only through a general rate case but, alternatively, via the TCR Rider. In turn, Minn. Stat. § 216B.16, subd. 7b(d) specifies the review of investments included in the TCR rider as a prudence review:

Upon receiving a filing for a rate adjustment pursuant to the tariff established in paragraph (b), the commission shall approve the annual rate adjustments provided that, after notice and comment, the costs included for recovery through the tariff **were or are expected to be prudently incurred and achieve transmission system improvements at the lowest feasible and prudent cost to ratepayers.** [Emphasis added]

In sum, there is no need for a hybrid certification/rider process to establish need because the first half of that already has occurred. The necessary review now concerns the prudence of costs incurred to implement the certified projects.

Finally, we note that the Department also has requested for the Company to provide comparable information for AMI and FAN as it does for ADMS in terms of work in progress and percent complete. We are happy to provide that as part of ongoing reporting we have otherwise committed to provide.⁴

⁴ Department Comments at page 11.

II. METRICS AND CONSUMER PROTECTIONS

A. Metrics

The Commission's July 23, 2020 Order certifying AMI and FAN requires that the Company propose specific metrics and evaluation methods, and a detailed plan describing how the Company will maximize the benefits of the AGIS investments for ratepayers.⁵ We recognize that parties are eager to identify and establish metrics, and that the Department's report the Commission requested it prepare is pending and will be filed December 1, 2020. We believe comments on particular metrics are best reserved until after that report is issued, though we note we have proposed a set of initial metrics that we continue to believe are an appropriate start.

That said, we believe it is appropriate to address a point related to metrics that both the Department and OAG made. Both pointed to a portion of Order Point No. 8 of the July 23, 2020 Order, which states:

8. Certification of the projects in ordering paragraph 7 is made with the recognition, and acceptance from Xcel, that all future cost recovery will be based upon the Company accomplishing Commission-approved metrics and performance evaluations for the certified projects...

In Comments, the Department says it reads this aspect of the Order as though the Company must "conclusively demonstrate that the established metrics were accomplished *before* seeking cost recovery." There are two issues with this interpretation. First, we believe it goes beyond the Commission's intent in voting on the Order point. This language was specifically discussed during the hearing and revised to make clear that cost recovery for AMI and FAN would not be conditioned on achievement of certain metrics:

MR. LONG: Madam Chair, Commissioner Schuerger, we are. I do have a couple of notes to share on those provisions if you would entertain them.

COMMISSIONER SCHUERGER: I would appreciate that.

MR. LONG: Sure. On 3E, I -- I read the language on accomplishing Commission-approved metrics a little bit too starkly for my comfort. And maybe we can agree that it doesn't read the way that I worry that it could. But future cost-recovery will be conditioned on the company accomplishing Commission-approved metrics. I wouldn't think that the Commission would want to issue a ruling that says, unless you hit 100

⁵ Order Point No. 8.

percent of a particular metric, you get no cost-recovery of this entire project. I would think it would be more of a performance-based ratemaking condition or metric that would affect our cost-recovery in some way but would not be a, you know, full on/full off kind of thing.

COMMISSIONER SCHUERGER: *So something like: will be based upon the company accomplishing?*

MR. LONG: *I'm comfortable with that*

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

Second, the appropriateness of impacting cost recovery based on the achievement of particular metrics depends on the particular metrics and the stage of implementation of AMI and FAN. At the outset, appropriate metrics should be limited to successful installation and implementation of the new technology and its base functionality. As the meters' and our capabilities mature, metrics tied to our use of the meters and data would likely be appropriate. But, it is unrealistic at this stage to expect the Company to know all the capabilities of these advanced meters, and it would be unreasonable to condition cost recovery on the achievement of such capabilities. These technologies are essentially deploying computers to every one of our customers' homes and businesses. We do not yet know the full extent of possible functionalities, capabilities, efficiencies, and services they might enable, nor is that even possible given that programs for the meters are only beginning to be developed.

B. Consumer Protections

In addition to metric commitments and reporting, the OAG advocates for caps on the Company's cost recovery based on our initial estimates of AMI and FAN costs like it does for transmission projects under the TCR, and that any incremental revenues and cost savings resulting from our AGIS investments be passed through to customers. Although cost caps can be a useful tool for assessing prudence of projects with well-established costs and benefits, like transmission lines, they are less useful for dynamic projects like AMI and FAN.

The Commission's history of using cost caps as a tool for measuring prudence is consistent with this understanding. Cost cap provisions originally were established for discrete regional transmission system investments that require a Certificate of Need.⁶

⁶ Docket No. E002/M-09-1048. IN THE MATTER OF THE PETITION OF 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* (April 27, 2010).

The Company has had decades of experience in developing and estimating such transmission system investments, and the Commission has had decades of experience reviewing these types of investments, leading to more accurate cost estimates at the time of the Certificate of Need proceeding.

When the Commission established cost cap provisions in 2009, however, they could not have contemplated the 2015 modifications made to Minn. Stat. §§ 216B.16, subd. 7b, and 216B.2425, subd. 2, allowing for recovery of advanced grid investments through the same TCR Rider mechanism. Unlike previous transmission investments, advanced grid technologies are relatively new, developing technologies with less certain costs and evolving benefits. And, as evidenced by comments in these dockets, many stakeholders are pushing for the development and acceleration of the capabilities of these technologies. Because of these differences, we believe it is reasonable for the Commission to continue to apply a cost cap to our regional transmission system investments, but utilize a different process for advanced grid projects.

Instead of implementing a firm cost cap for advanced grid projects, we recommend the Commission consider a transparent, holistic review process where we detail the projects, our oversight and governance of the projects and expenditures, and demonstrate the steps and actions we have taken to manage costs in the short- and long-term. We believe this process would balance the strong interest to protect our customers from unforeseen costs or cost overruns with respect to distribution-grid modernization projects like AMI and FAN that are requested to be recovered through the TCR Rider, while recognizing that we are implementing new and developing technologies with new and developing costs and benefits—an effort that is much different than, for example, constructing a new segment of transmission line.

C. Reporting

The OAG suggests a first step in evaluating our performance will be to establish reporting requirements. We agree reporting is important to keep the Commission and stakeholders apprised of our implementation progress and on other commitments the Company may make, as we also discussed in our September 25, 2020 Response to the Department's Notice in Docket No. E002/DI-20-627. That said, the reporting should be set at a cadence that is meaningful for stakeholders. For example, quarterly reports of implementation progress may be appropriate, whereas reporting on something like anticipated new programs and services and their design timeframes would be more meaningful on an annual basis.

III. CLASS COST ALLOCATION

XLI continues to raise the issue of class cost allocation with respect to recovery of the certified AMI and FAN investments. We addressed this in our April 10, 2020 Reply Comments in Docket No. E002/M-19-666 – agreeing that distribution and transmission expenses are allocated to classes differently, including AGIS investments in future TCR recovery requests.⁷ As such, when we submit our TCR cost recovery Petition, we will explain how we propose to allocate the costs of each of the investment types to customer classes.

CONCLUSION

Xcel Energy appreciates the opportunity to provide these Reply Comments. We look forward further dialogue and exploration of these issues.

Dated: October 30, 2020

Northern States Power Company

⁷ See Xcel Energy Reply Comments, Attachment A beginning at page 30, Docket No. E002/M-19-666 (April 10, 2020).

IDP Grid Modernization Content Roadmap

| Planning Objectives: The Commission is facilitating comprehensive, coordinated, transparent, integrated distribution plans to: <ul style="list-style-type: none"> · Maintain and enhance the safety, security, reliability, and resilience of the electricity grid, at fair and reasonable costs, consistent with the state's energy policies; · Enable greater customer engagement, empowerment, and options for energy services; · Move toward the creation of efficient, cost-effective, accessible grid platforms for new products, new services, and opportunities for adoption of new distributed technologies; and, · Ensure optimized utilization of electricity grid assets and resources to minimize total system costs. Provide the Commission with the information necessary to understand Xcel's short-term and long-term distribution system plans, the costs and benefits of specific investments, and a comprehensive analysis of ratepayer cost and value. | | | |
|---|--|---|---|
| Source | Requirement/Description | IDP | Rate Case: AGIS [as presented in Gersack as Exhibit (MCG-1), Schedule 2] |
| Docket No. E002/CI-18-251 Aug. 30, 2018 Order (Updated to include changes from Jul 16, 2019 Order) | A. Baseline Distribution System and Financial Data: Financial Data | | |
| | 26. Historical distribution system spending for the past 5-years, in each category: | | |
| | a. Age-Related Replacements and Asset Renewal b. System Expansion or Upgrades for Capacity c. System Expansion or Upgrades for Reliability and Power Quality d. New Customer Projects and New Revenue e. Grid Modernization and Pilot Projects f. Projects related to local (or other) government-requirements g. Metering h. Other | II.D, III.B, XIII, XIV | Addressed in IDP |
| | 28. Projected distribution system spending for 5-years into the future for the categories listed above, itemizing any non-traditional distribution projects | II.D-E, IX, XIV, Attachments M1, M2, M3, M5 | Gersack II(C) AGIS Expenditures 2020-2029 Gersack V(D)(2) AGIS PM Costs 2020-2029 Bloch V(A) AGIS - Distribution 2020-2029 Bloch V(D)(5) AMI - Distribution 2020-2029 Bloch V(E)(3) FAN - Distribution 2020-2029 Bloch V(F)(6) FLISR - Distribution 2020-2029 Bloch V(G)(7) IVVO - Distribution 2020-2029 Harkness V(E)(3)(c)(4) AMI - IT 2020-2029 Harkness V(E)(4)(c)(4) FAN - IT 2020-2029 Harkness V(E)(5)(c) FLISR - IT 2020-2029 Harkness V(E)(6)(c) IVVO - IT 2020-2029 Harkness V(E)(7) AGIS - IT 2020-2029 Duggirala Schedules 2, 3, 4 |
| | 29. Planned distribution capital projects, including drivers for the project, timeline for improvement, summary of anticipated changes in historic spending. Driver categories should include: | | |
| | a. Age-Related Replacements and Asset Renewal b. System Expansion or Upgrades for Capacity c. System Expansion or Upgrades for Reliability and Power Quality d. New Customer Projects and New Revenue e. Grid Modernization and Pilot Projects f. Projects related to local (or other) government-requirements g. Metering h. Other | II.D, IX, XIV, and Attachments F1, G1, M1, M2, M3 | Gersack II(B) Exec Summary - Drivers Gersack IV Drivers of AGIS Strategy Gersack II(C) Exec Summary - Implementation Gersack V(A) Component Implementation Gersack V(B) Overall Timeline/Implementation Bloch V(A) Projects and Timeline Bloch V(B) Drivers (Limitations of System) Bloch V(D) AMI Bloch V(E) FAN Bloch V(F) FLISR Bloch V(G) IVVO Harkness V(B)(E) AGIS Overview Harkness V(E)(3) AMI Harkness V(E)(4) FAN Harkness V(E)(5) FLISR Harkness V(E)(6) IVVO |
| | 30. Provide any available cost benefit analysis in which the company evaluated a non-traditional distribution system solution to either a capital or operating upgrade or replacement | VI and Attachment H | Addressed in IDP |

| Source | Requirement/Description | IDP | Rate Case: AGIS [as presented in Gersack as Exhibit __ (MCG-1), Schedule 2] |
|---|--|---|--|
| Docket No. E002/CI-18-251 Aug. 30, 2018 Order (Updated to include changes from Jul 16, 2019 Order) | D. Long-Term Distribution System Modernization and Infrastructure Investment Plan | XIV and Attachments J, M1 | Gersack II Exec Summary Gersack IV Drivers of AGIS Strategy Gersack V AGIS Components and Implementation Gersack VI Customer Experience |
| | 2. Xcel shall provide a 5-year Action Plan as part of a 10-year long-term plan for distribution system developments and investments in grid modernization based on internal business plans and considering the insights gained from the DER futures analysis, hosting capacity analysis, and non-wires alternatives analysis. The 5-year Action Plan should include a detailed discussion of the underlying assumptions (including load growth assumptions) and the costs of distribution system investments planned for the next 5-years (expanding on topics and categories listed above). Xcel should include specifics of the 5-year Action Plan investments. Topics that should be discussed, as appropriate, include at a minimum: | | |
| | · Overview of investment plan: scope, timing, and cost recovery mechanism | II, IX and XIV and Attachment M1 | Gersack II Exec Summary |
| | · Grid Architecture: Description of steps planned to modernize the utility's grid and tools to help understand the complex interactions that exist in the present and possible future grid scenarios and what utility and customer benefits that could or will arise. | IX, X, XIV, Figure 73 and Attachments M1-M4 | Gersack V AGIS Components and Implementation Bloch V(D) AMI Bloch V(E) FAN Bloch V(F) FLISR Bloch V(G) IVVO Harkness V(E)(3) AMI Harkness V(E)(4) FAN Harkness V(E)(5) FLISR Harkness V(E)(6) IVVO Harkness V(D) Cyber Security Cardenas V(F) Quantifiable Benefits Gersack VI Customer Experience (Benefits) |
| | · Alternatives analysis of investment proposal: objectives intended with a project, general grid modernization investments considered, alternative cost and functionality analysis (both for the utility and the customer), implementation order options, and considerations made in pursuit of short-term investments. The analysis should be sufficient enough to justify and explain the investment. | IX and Attachments M1-M3 | Gersack V(C) Alternatives to AGIS Bloch V(D)(6) AMI Alternatives Bloch V(F)(7) FLISR Alternatives Bloch V(G)(6) IVVO Alternatives Harkness V(E)(4)(g) FAN Alternatives |
| | · System interoperability and communications strategy | IX, X and Attachments M2, M3 | Bloch V(D)(7) AMI Interoperability Bloch V(F)(8) FLISR Interoperability Bloch V(G)(7) IVVO Interoperability Harkness V(E)(4) FAN Overview Harkness V(E)(4)(b) FAN Interoperability Harkness V(E)(3)(b) AMI Integration |
| | · Costs and plans associated with obtaining system data (EE load shapes, PV output profiles with and without battery storage, capacity impacts of DR combined with EE, EV charging profiles, etc.) | IDP XI (F) | Addressed in IDP |
| | · Interplay of investment with other utility programs (effects on existing utility programs such as demand response, efficiency projects, etc.) | Attachment M1 | Gersack VI(B)(4) Energy Savings Programs |
| | · Customer anticipated benefit and cost | V.D.2, IX.F-G, XVI and Attachments M1-M5, O1-O4 | Gersack VII Prudence of AGIS Investments (CBA) Duggirala Overall CBA Costs, Benefits, Results Gersack VIII Bill Impacts <i>Costs and Benefits are also discussed throughout Bloch V (AGIS), Harkness V (AGIS), and Cardenas V (AGIS)</i> |
| | · Customer data and grid data management plan (how it is planned to be used and/or shared with customers and/or third parties) | IX, X and Attachments M1, M3 | Gersack VI Customer Experience (overall) Gersack VI(B)(3) Digital Experience (web portal) Gersack Schedule 3 Customer Strategy (Appendix B: Data Access, Privacy, Governance) Harkness V(D) Cyber Security |
| | · Plans to manage rate or bill impacts, if any | IX.G, XIV.A and Attachment M1 | Gersack VIII Bill Impacts |
| | · Impacts to net present value of system costs (in NPV \$/MWh or MW) | XIV and Attachment L | Addressed in IDP |

| Source | Requirement/Description | IDP | Rate Case: AGIS [as presented in Gersack as Exhibit (MCG-1), Schedule 2] |
|---|--|--|---|
| Docket No. E002/CI-18-251 Aug. 30, 2018 Order (Updated to include changes from Jul 16, 2019 Order) | · For each grid modernization project in its 5-year Action Plan, Xcel should provide a cost-benefit analysis <u>based on the best information it has at the time and including a discussion of non-quantifiable benefits. Xcel shall include all information used to support its analysis.</u> | IX, X and Attachments M1-M5, O1-O4, filed Workpapers | Gersack VII(A) CBA Gesack VII(B) Qualitative Benefits Duggirala II(B) Quantitative Inputs Duggirala II(C) Results Duggirala IV Qualitative Benefits |
| | · Status of any existing pilots or potential for new opportunities for grid modernization pilots | IX, X, XIII and Attachment M1 | Gersack III Grid Mod Background (Res TOU Pilot) Gersack IV(C)(2) Advanced Rate Design/Billing Options |
| | 3. In addition to the 5-year Action Plan, Xcel shall provide a discussion of its vision for the planning, development, and use of the distribution system over the next 10 years. The 10-year Long-Term Plan discussion should address long-term assumptions (including load growth assumptions), the long-term impact of the 5-year Action Plan investments, what changes are necessary to incorporate DER into future planning processes based on the DER futures analysis, and any other types of changes that may need to take place in the tools and processes Xcel is currently using. | IX, X, XIV and Attachments M1, M2 | Gersack II Exec Summary Gersack V AGIS Implementation Gersack VI(D) Customer Experience (Long Term) Bloch D(4)(d)(1) AMI Benefits (DER) Bloch G(4)(b) IVVO Benefits (DER) |
| Docket No. E002/CI-18-251 July 16, 2019 Order | 8. Provide all information, analysis and assumptions used to support the cost/benefit ratio for AMI, FAN, and FLISR; and IVVO and CVR cost-benefit analysis as part of its 2019 IDP filing or other future filings. | IX,F and Attachments M1-M5, O1-O4, filed Workpapers | Duggirala Overall - CBA testimony points to the other witnesses who provide detailed cost and benefit forecasts. |
| Docket No. E002/M-17-797 Sept. 27, 2019 Order | 9. If and when Xcel requests cost recovery for Advanced Grid Intelligence and Security investments, the filing must include a business case and comprehensive assessment of qualitative and quantitative benefits to customers, considering, at a minimum, the following: | IX, X and Attachments M1-M5 | Gersack II Exec Summary Gersack III Grid Mod Background Gersack IV(D) Commission Policy and Stakeholder Input Gersack V(A) AGIS Components Gersack V(B) Overall Implementation Gersack VII(A) CBA Quantified Benefits Gersack VII(B) Qualitative Benefits Bloch V(D) AMI Bloch V(E) FAN Bloch V(F) FLISR Bloch V(G) IVVO Harkness V(E)(3) AMI Harkness V(E)(4) FAN Harkness V(E)(5) FLISR Harkness V(E)(6) IVVO |
| | A. Scope of Investment | | |
| | 1. Investment Description | | |
| | a. Detailed description of proposed investment and project life | | |
| | b. If multiple components, overview of costs and descriptions of each | | |
| | i. Include purpose and role | | |
| | ii. Explain known and potential future use cases for each component | | |
| | iii. Explain known and potential value streams and how each component fits with state policy, statutes, rules and Commission orders | Attachments M1-M3, N1-N4 | Gersack V(C) Alternatives to AGIS Bloch V(D)(5) AMI Cost Development (RFP discussion) Bloch V(D)(6) AMI Alternatives Bloch V(F)(6) FLISR Cost Development Bloch V(F)(7) FLISR Alternatives Bloch V(G)(5) IVVO Cost Development Bloch V(G)(6) IVVO Alternatives Harkness V(E)(4)(e) FAN Cost Development Harkness V(E)(4)(g) FAN Alternatives AGIS Supporting files, Vol. 2B (on disc) |
| | iv. Describe beneficiaries of each investment (who, how many, over what time period) | | |
| | c. Articulation of principles, objectives, capability, functionalities, and technologies enabled by investment; and | | |
| | d. Interrelation and interdependencies with other existing or future investments, including overlapping costs: scope, amount, timing. | | |
| | 2. Alternatives considered | | |
| | a. If a Request for Proposal was used provide: | | |
| | i. The RFP issued, including list of all services or assets scoped in the RFP | | |
| | ii. Provide summary of responses | | |
| | iii. Provide assessment of bids and factors used for selection | | |
| | iv. The scope of offerings or services included in the selected bid | | |
| | b. If not, what was used. | | |
| | 3. Costs | IX and Attachments M5, O1-4, filed Workpapers | Duggirala II(A) Model Structure and Requirements Duggirala Schedules 2, 3, 4, 5 |
| | a. Provide sufficient information to determine what is included in the investment in each of the following categories: | | |
| | i. Direct Costs (product, service, customer, project, or activity) | | |
| | ii. Indirect Costs | | |
| | iii. Tangible Costs | | |
| | iv. Intangible Costs | | |
| | v. Real Costs | | |
| | b. If needed, provide the utility's definition of each category and whether internal or external labor costs are included in the category and the instant petition. If the costs are not included in the petition, include information on where and when those costs will be sought to be recovered. | Attachment M5 | Duggirala II(A) Model Structure and Requirements |
| | c. If there is overlap or costs included in both categories, outline the overlapping costs and explain. | Attachment M5 | Duggirala II(A) Model Structure and Requirements Duggirala Schedules 2, 3, 4, 5 |
| | d. For each of the cost categories outline whether the investment has been partially approved or included in previous or on-going docket riders, rate cases, or other cost recovery mechanisms or note all costs are included in the instant petition. | II,D-E, IX, XIV, XV | Gersack II(C) Exec Summary - AGIS Implementation Gersack III Grid Mod Background Bloch V(C) Grid Mod Efforts to Date Harkness V(E)(2) Grid Mod Efforts to Date |

| Source | Requirement/Description | IDP | Rate Case: AGIS [as presented in Gersack as Exhibit __ (MCG-1), Schedule 2] |
|--|---|--|--|
| Docket No. E002/M-17-797 Sept. 27, 2019 Order | 4. Detailed Analysis of the type of proposed or multiple cost effectiveness analysis utilized: | Attachment M5 | Duggirala III |
| | a. Least-cost, best-fit (Xcel proposes in IDP Reply comments) | | |
| | b. Utility Cost-test; and | | |
| | c. Integrated Power System and Societal Cost test | | |
| | B. Provide a cost benefit analysis for (1) each investment component with overlapping costs or benefits in isolation and (2) each bundled components, as appropriate | V.D, IX and Attachments D2, M1-M5, O1-O4, filed Workpapers | Duggirala II(C) CBA Results AGIS Supporting files, Vol. 2B (on disc) Gersack VII(A)(I) CBA Overview |
| | 1. Provide Discount Rate Used and Basis; and | Attachment M5 and filed Workpapers | Duggirala II(A) Model Structure and Requirements |
| | 2. Identify cost categories and benefit categories used (explain metrics), including an explanation of how benefits can be monitored over time and proposal for reporting to Commission: | IX and Attachments M1, M5 | Duggirala II(B) Quantitative Inputs Gersack IX Metrics and Reporting |
| | a. Identify quantitative costs and qualitative costs: i. Use quantitative methods to address qualitative benefits to the extent possible. ii. Explain system used to assess value and priorities to qualitative benefits (points and/or weighting); and iii. Identify sensitivity ranges on estimates or value | V.D, IX and Attachments D1, D2, M5, O1-O4 | Duggirala Overall CBA Costs, Benefits, Results |
| | b. Include a long-term bill impact analysis | IX, XIV and Attachment M1 | Gersack VIII Bill Impacts |
| | c. Include a reference case/scenario without the project (or group of projects); and | IX, XIV and Attachments M1, M5 | Duggirala II(A) Model Structure and Requirements Gersack VIII Bill Impacts |
| | d. Apply the following principles to ensure the investment analysis has: | Attachments M1-M5 | <i>The Company has incorporated these principles throughout its analyses, including:</i> Gersack V AGIS Components and Implementation Bloch V(D) AMI Bloch V(E) FAN Bloch V(F) FLISR Bloch V(G) IVVO Harkness V(E)(3) AMI Harkness V(E)(4) FAN Harkness V(E)(5) FLISR Harkness V(E)(6) IVVO Cardenas V(F) Quantifiable Benefits Gersack VI Customer Experience (Benefits) Duggirala Overall CBA Costs, Benefits, Results |
| | i. compared with traditional resources or technologies; | | |
| | ii. clearly accounted for state regulatory and policy goals; | | |
| | iii. accounted for all relevant costs and benefits, including those difficult to quantify; | | |
| | iv. provided symmetry across relevant costs and benefits; | | |
| | v. applied a full life-cycle analysis; | | |
| | vi. provided a sufficient incremental and forward-looking view; | | |
| | vii. is transparent; | | |
| | viii. avoided combining or conflating different costs and benefits; | | |
| | ix. discuss customer equity issues, as needed; | | |
| | x. assessed bundles and portfolio where reasonable; and | | |
| | xi. addressed locational and temporal values. | | |

CERTIFICATE OF SERVICE

I, Lynnette Sweet, 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-19-666
 E999/DI-20-627
 E002/M-20-680**

Dated this 30th day of October 2020

/s/

Lynnette Sweet
Regulatory Administrator

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| Brad | Klein | bklein@elpc.org | Environmental Law & Policy Center | 35 E. Wacker Drive, Suite 1600 Suite 1600 Chicago, IL 60601 | Electronic Service | No | OFF_SL_19-666_Official |
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| First Name | Last Name | Email | Company Name | Address | Delivery Method | View Trade Secret | Service List Name |
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| 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_20-627_DI-20-627 |
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| Arthur | Crowell | Crowell.arthur@yahoo.com | A Work of Art Solar | 14333 Orchard Rd. Minnetonka, MN 55345 | Electronic Service | No | OFF_SL_20-627_DI-20-627 |
| 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_20-627_DI-20-627 |
| James | Denniston | james.r.denniston@xcenergy.com | Xcel Energy Services, Inc. | 414 Nicollet Mall, 401-8 Minneapolis, MN 55401 | Electronic Service | No | OFF_SL_20-627_DI-20-627 |
| Curt | Dieren | curt.dieren@dgr.com | L&O Power Cooperative | 1302 S Union St Rock Rapids, IA 51246 | Electronic Service | No | OFF_SL_20-627_DI-20-627 |
| 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_20-627_DI-20-627 |
| 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_20-627_DI-20-627 |
| Brian | Edstrom | briane@cubminnesota.org | Citizens Utility Board of Minnesota | 332 Minnesota St Ste W1360 Saint Paul, MN 55101 | Electronic Service | No | OFF_SL_20-627_DI-20-627 |

| First Name | Last Name | Email | Company Name | Address | Delivery Method | View Trade Secret | Service List Name |
|------------|----------------|---------------------------------|-----------------------------------|---|--------------------|-------------------|-------------------------|
| Kristen | Eide Tollefson | healingsystems69@gmail.com | R-CURE | 28477 N Lake Ave Frontenac, MN 55026-1044 | Electronic Service | No | OFF_SL_20-627_DI-20-627 |
| Rebecca | Eilers | rebecca.d.eilers@xcelenergy.com | Xcel Energy | 414 Nicollet Mall - 401 7th Floor Minneapolis, MN 55401 | Electronic Service | No | OFF_SL_20-627_DI-20-627 |
| 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_20-627_DI-20-627 |
| Betsy | Engelking | betsy@geronimoenergy.com | Geronimo Energy, LLC | 8400 Normandale Lake Blvd Suite 1200 Bloomington, MN 55437 | Electronic Service | No | OFF_SL_20-627_DI-20-627 |
| 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_20-627_DI-20-627 |
| James C. | Erickson | jericksonkbc@gmail.com | Kelly Bay Consulting | 17 Quechee St Superior, WI 54880-4421 | Electronic Service | No | OFF_SL_20-627_DI-20-627 |
| Jim | Erickson | jim.g.erickson@xcelenergy.com | Xcel Energy | 414 Nicollet mall 7th Flr Minneapolis, MN 55401 | Electronic Service | No | OFF_SL_20-627_DI-20-627 |
| 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_20-627_DI-20-627 |
| 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_20-627_DI-20-627 |
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| First Name | Last Name | Email | Company Name | Address | Delivery Method | View Trade Secret | Service List Name |
|------------|------------|------------------------------------|----------------------------------|---|--------------------|-------------------|-------------------------|
| Nathan | Franzen | nathan@geronimoenergy.com | Geronimo Energy, LLC | 8400 Normandale Lake Blvd Suite 1200 Bloomington, MN 55437 | Electronic Service | No | OFF_SL_20-627_DI-20-627 |
| Hal | Galvin | halgalvin@comcast.net | Provectus Energy Development llc | 1936 Kenwood Parkway Minneapolis, MN 55405 | Electronic Service | No | OFF_SL_20-627_DI-20-627 |
| Edward | Garvey | garveyed@aol.com | Residence | 32 Lawton St Saint Paul, MN 55102 | Electronic Service | No | OFF_SL_20-627_DI-20-627 |
| Edward | Garvey | edward.garvey@AESLconsulting.com | AESL Consulting | 32 Lawton St Saint Paul, MN 55102-2617 | Electronic Service | No | OFF_SL_20-627_DI-20-627 |
| 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_20-627_DI-20-627 |
| Allen | Gleckner | gleckner@fresh-energy.org | Fresh Energy | 408 St. Peter Street Ste 220 Saint Paul, Minnesota 55102 | Electronic Service | No | OFF_SL_20-627_DI-20-627 |
| Timothy | Gulden | timothy.gulden@yahoo.com | Winona Renewable Energy, LLC | 1449 Ridgewood Dr Winona, MN 55987 | Electronic Service | No | OFF_SL_20-627_DI-20-627 |
| Tony | Hainault | anthony.hainault@co.hennepin.mn.us | Hennepin County DES | 701 4th Ave S Ste 700 Minneapolis, MN 55415-1842 | Electronic Service | No | OFF_SL_20-627_DI-20-627 |
| Kim | Havey | kim.havey@minneapolismn.gov | City of Minneapolis | 350 South 5th Street, Suite 315M Minneapolis, MN 55415 | Electronic Service | No | OFF_SL_20-627_DI-20-627 |
| Todd | Headlee | theadlee@dvigridsolutions.com | Dominion Voltage, Inc. | 701 E. Cary Street Richmond, VA 23219 | Electronic Service | No | OFF_SL_20-627_DI-20-627 |

| First Name | Last Name | Email | Company Name | Address | Delivery Method | View Trade Secret | Service List Name |
|------------|-----------|---------------------------------------|--|---|--------------------|-------------------|-------------------------|
| Amber | Hedlund | amber.r.hedlund@xcelenergy.com | Northern States Power Company dba Xcel Energy-Elec | 414 Nicollet Mall, 401-7 Minneapolis, MN 55401 | Electronic Service | No | OFF_SL_20-627_DI-20-627 |
| Jared | Hendricks | jared.hendricks@owatonnautilities.com | Owatonna Public Utilities | PO Box 800 208 S Walnut Ave Owatonna, MN 55060-2940 | Electronic Service | No | OFF_SL_20-627_DI-20-627 |
| Annete | Henkel | mui@mutilityinvestors.org | Minnesota Utility Investors | 413 Wacouta Street #230 St.Paul, MN 55101 | Electronic Service | No | OFF_SL_20-627_DI-20-627 |
| Shane | Henriksen | shane.henriksen@enbridge.com | Enbridge Energy Company, Inc. | 1409 Hammond Ave FL 2 Superior, WI 54880 | Electronic Service | No | OFF_SL_20-627_DI-20-627 |
| Lynn | Hinkle | lynnh@ips-solar.com | IPS Solar | 2670 Patton Rd Roseville, MN 55113 | Electronic Service | No | OFF_SL_20-627_DI-20-627 |
| 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_20-627_DI-20-627 |
| Jan | Hubbard | jan.hubbard@comcast.net | | 7730 Mississippi Lane Brooklyn Park, MN 55444 | Electronic Service | No | OFF_SL_20-627_DI-20-627 |
| Geoffrey | Inge | ginge@regintl.com | Regulatory Intelligence LLC | PO Box 270636 Superior, CO 80027-9998 | Electronic Service | No | OFF_SL_20-627_DI-20-627 |
| Ralph | Jacobson | ralphj@ips-solar.com | | 2126 Roblyn Avenue Saint Paul, Minnesota 55104 | Electronic Service | No | OFF_SL_20-627_DI-20-627 |
| Casey | Jacobson | cjacobson@bepc.com | Basin Electric Power Cooperative | 1717 East Interstate Avenue Bismarck, ND 58501 | Electronic Service | No | OFF_SL_20-627_DI-20-627 |

| First Name | Last Name | Email | Company Name | Address | Delivery Method | View Trade Secret | Service List Name |
|------------|------------------|---------------------------|-----------------------------------|---|--------------------|-------------------|-------------------------|
| John S. | Jaffray | jjaffray@jirpower.com | JJR Power | 350 Highway 7 Suite 236 Excelsior, MN 55331 | Electronic Service | No | OFF_SL_20-627_DI-20-627 |
| Alan | Jenkins | aj@jenkinsatlaw.com | Jenkins at Law | 2950 Yellowtail Ave. Marathon, FL 33050 | Electronic Service | No | OFF_SL_20-627_DI-20-627 |
| Richard | Johnson | Rick.Johnson@lawmoss.com | Moss & Barnett | 150 S. 5th Street Suite 1200 Minneapolis, MN 55402 | Electronic Service | No | OFF_SL_20-627_DI-20-627 |
| Sarah | Johnson Phillips | sarah.phillips@stoel.com | Stoel Rives LLP | 33 South Sixth Street Suite 4200 Minneapolis, MN 55402 | Electronic Service | No | OFF_SL_20-627_DI-20-627 |
| Nate | Jones | njones@hcpd.com | Heartland Consumers Power | PO Box 248 Madison, SD 57042 | Electronic Service | No | OFF_SL_20-627_DI-20-627 |
| Michael | Kampmeyer | mkampmeyer@a-e-group.com | AEG Group, LLC | 260 Salem Church Road Sunfish Lake, Minnesota 55118 | Electronic Service | No | OFF_SL_20-627_DI-20-627 |
| Mark J. | Kaufman | mkaufman@ibewlocal949.org | IBEW Local Union 949 | 12908 Nicollet Avenue South Burnsville, MN 55337 | Electronic Service | No | OFF_SL_20-627_DI-20-627 |
| Ted | Kjos | tkjos@mienergy.coop | MiEnergy Cooperative | 31110 Cooperative Way PO Box 626 Rushford, MN 55971 | Electronic Service | No | OFF_SL_20-627_DI-20-627 |
| 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_20-627_DI-20-627 |
| | | | | | | | |

| First Name | Last Name | Email | Company Name | Address | Delivery Method | View Trade Secret | Service List Name |
|------------|-----------|----------------------------|---|---|--------------------|-------------------|-------------------------|
| Thomas | Koehler | TGK@IBEW160.org | Local Union #160, IBEW | 2909 Anthony Ln St Anthony Village, MN 55418-3238 | Electronic Service | No | OFF_SL_20-627_DI-20-627 |
| Chris | Kopel | chrisk@CMPASgroup.org | Central Minnesota Municipal Power Agency | 459 S Grove St Blue Earth, MN 56013-2629 | Electronic Service | No | OFF_SL_20-627_DI-20-627 |
| Brian | Krambeer | bkrambeer@mienergy.coop | MiEnergy Cooperative | PO Box 626 31110 Cooperative Way Rushford, MN 55971 | Electronic Service | No | OFF_SL_20-627_DI-20-627 |
| Jon | Kramer | sundialjon@gmail.com | Sundial Solar | 3209 W 76th St Edina, MN 55435 | Electronic Service | No | OFF_SL_20-627_DI-20-627 |
| Michael | Krause | michaelkrause61@yahoo.com | Kandiyo Consulting, LLC | 433 S 7th Street Suite 2025 Minneapolis, Minnesota 55415 | Electronic Service | No | OFF_SL_20-627_DI-20-627 |
| Michael | Krikava | mkrikava@taftlaw.com | Taft Stettinius & Hollister LLP | 2200 IDS Center 80 S 8th St Minneapolis, MN 55402 | Electronic Service | No | OFF_SL_20-627_DI-20-627 |
| Matthew | Lacey | Mlacey@greenergy.com | Great River Energy | 12300 Elm Creek Boulevard Maple Grove, MN 553694718 | Electronic Service | No | OFF_SL_20-627_DI-20-627 |
| Carmel | Laney | carmel.laney@stoel.com | Stoel Rives LLP | 33 South Sixth Street Suite 4200 Minneapolis, MN 55402 | Electronic Service | No | OFF_SL_20-627_DI-20-627 |
| Douglas | Larson | dlarson@dakotaelectric.com | Dakota Electric Association | 4300 220th St W Farmington, MN 55024 | Electronic Service | No | OFF_SL_20-627_DI-20-627 |
| Peder | Larson | plarson@larkinhoffman.com | Larkin Hoffman Daly & Lindgren, Ltd. | 8300 Norman Center Drive Suite 1000 Bloomington, MN 55437 | Electronic Service | No | OFF_SL_20-627_DI-20-627 |

| First Name | Last Name | Email | Company Name | Address | Delivery Method | View Trade Secret | Service List Name |
|------------|---------------|---------------------------------|-------------------------------------|--|--------------------|-------------------|-------------------------|
| James D. | Larson | james.larson@avantenergy.com | Avant Energy Services | 220 S 6th St Ste 1300 Minneapolis, MN 55402 | Electronic Service | No | OFF_SL_20-627_DI-20-627 |
| Dean | Leischow | dean@sunrisenrg.com | Sunrise Energy Ventures | 315 Manitoba Ave Wayzata, MN 55391 | Electronic Service | No | OFF_SL_20-627_DI-20-627 |
| 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_20-627_DI-20-627 |
| Ryan | Long | ryan.j.long@xcelenergy.com | Xcel Energy | 414 Nicollet Mall 401 8th Floor Minneapolis, MN 55401 | Electronic Service | No | OFF_SL_20-627_DI-20-627 |
| Susan | Ludwig | sludwig@mnpower.com | Minnesota Power | 30 West Superior Street Duluth, MN 55802 | Electronic Service | No | OFF_SL_20-627_DI-20-627 |
| Kavita | Maini | kmairi@wi.rr.com | KM Energy Consulting, LLC | 961 N Lost Woods Rd Oconomowoc, WI 53066 | Electronic Service | No | OFF_SL_20-627_DI-20-627 |
| Pam | Marshall | pam@energycents.org | Energy CENTS Coalition | 823 7th St E St. Paul, MN 55106 | Electronic Service | No | OFF_SL_20-627_DI-20-627 |
| Mary | Martinka | mary.a.martinka@xcelenergy.com | Xcel Energy Inc | 414 Nicollet Mall 7th Floor Minneapolis, MN 55401 | Electronic Service | No | OFF_SL_20-627_DI-20-627 |
| 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_20-627_DI-20-627 |
| Gregg | Mast | gmast@cleanenergyeconomy.mn.org | Clean Energy Economy Minnesota | 4237 24th Avenue S Minneapolis, MN 55406 | Electronic Service | No | OFF_SL_20-627_DI-20-627 |

| First Name | Last Name | Email | Company Name | Address | Delivery Method | View Trade Secret | Service List Name |
|------------|-------------|----------------------------------|------------------------------------|--|--------------------|-------------------|-------------------------|
| Dave | McNary | David.McNary@hennepin.us | Hennepin County DES | 701 Fourth Ave S Ste 700 Minneapolis, MN 55415-1842 | Electronic Service | No | OFF_SL_20-627_DI-20-627 |
| Thomas | Melone | Thomas.Melone@AllcoUS.com | Minnesota Go Solar LLC | 222 South 9th Street Suite 1600 Minneapolis, Minnesota 55120 | Electronic Service | No | OFF_SL_20-627_DI-20-627 |
| Brian | Meloy | brian.meloy@stinson.com | STINSON LLP | 50 S 6th St Ste 2600 Minneapolis, MN 55402 | Electronic Service | No | OFF_SL_20-627_DI-20-627 |
| 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_20-627_DI-20-627 |
| Stacy | Miller | stacy.miller@minneapolismn.gov | City of Minneapolis | 350 S. 5th Street Room M 301 Minneapolis, MN 55415 | Electronic Service | No | OFF_SL_20-627_DI-20-627 |
| David | Moeller | dmoeller@allete.com | Minnesota Power | 30 W Superior St Duluth, MN 558022093 | Electronic Service | No | OFF_SL_20-627_DI-20-627 |
| Dalene | Monsebroten | dalene.monsebroten@nmpagency.com | Northern Municipal Power Agency | 123 2nd St W Thief River Falls, MN 56701 | Electronic Service | No | OFF_SL_20-627_DI-20-627 |
| Andrew | Moratzka | andrew.moratzka@stoel.com | Stoel Rives LLP | 33 South Sixth St Ste 4200 Minneapolis, MN 55402 | Electronic Service | No | OFF_SL_20-627_DI-20-627 |
| Ben | Nelson | benn@cmpasgroup.org | CMPMPA | 459 South Grove Street Blue Earth, MN 56013 | Electronic Service | No | OFF_SL_20-627_DI-20-627 |
| Carl | Nelson | cnelson@mncee.org | Center for Energy and Environment | 212 3rd Ave N Ste 560 Minneapolis, MN 55401 | Electronic Service | No | OFF_SL_20-627_DI-20-627 |

| First Name | Last Name | Email | Company Name | Address | Delivery Method | View Trade Secret | Service List Name |
|------------|-----------|----------------------------------|-------------------------------------|--|--------------------|-------------------|-------------------------|
| Dale | Niezwaag | dniezwaag@bepc.com | Basin Electric Power Cooperative | 1717 East Interstate Avenue Bismarck, ND 58503 | Electronic Service | No | OFF_SL_20-627_DI-20-627 |
| David | Niles | david.niles@avantenergy.com | Minnesota Municipal Power Agency | 220 South Sixth Street Suite 1300 Minneapolis, Minnesota 55402 | Electronic Service | No | OFF_SL_20-627_DI-20-627 |
| Sephra | Ninow | sephra.ninow@energycenter.org | Center for Sustainable Energy | 426 17th Street, Suite 700 Oakland, CA 94612 | Electronic Service | No | OFF_SL_20-627_DI-20-627 |
| Rolf | Nordstrom | rnordstrom@gpisd.net | Great Plains Institute | 2801 21ST AVE S STE 220 Minneapolis, MN 55407-1229 | Electronic Service | No | OFF_SL_20-627_DI-20-627 |
| 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_20-627_DI-20-627 |
| David | O'Brien | david.obrien@navigant.com | Navigant Consulting | 77 South Bedford St Ste 400 Burlington, MA 01803 | Electronic Service | No | OFF_SL_20-627_DI-20-627 |
| 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_20-627_DI-20-627 |
| Russell | Olson | rolson@hcpd.com | Heartland Consumers Power District | PO Box 248 Madison, SD 570420248 | Electronic Service | No | OFF_SL_20-627_DI-20-627 |
| Carol A. | Overland | overland@legalelectric.org | Legalelectric - Overland Law Office | 1110 West Avenue Red Wing, MN 55066 | Electronic Service | No | OFF_SL_20-627_DI-20-627 |
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| First Name | Last Name | Email | Company Name | Address | Delivery Method | View Trade Secret | Service List Name |
|------------|-----------|-----------------------------|--------------------------------------|--|--------------------|-------------------|-------------------------|
| Audrey | Partridge | apartridge@mncee.org | Center for Energy and Environment | 212 3rd Ave. N. Suite 560 Minneapolis, Minnesota 55401 | Electronic Service | No | OFF_SL_20-627_DI-20-627 |
| Dan | Patry | dpatry@sunedison.com | SunEdison | 600 Clipper Drive Belmont, CA 94002 | Electronic Service | No | OFF_SL_20-627_DI-20-627 |
| 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_20-627_DI-20-627 |
| Joyce | Peppin | joyce@mrea.org | Minnesota Rural Electric Association | 11640 73rd Ave N Maple Grove, MN 55369 | Electronic Service | No | OFF_SL_20-627_DI-20-627 |
| Mary Beth | Peranteau | mperanteau@wheelerlaw.com | Wheeler Van Sickle & Anderson SC | 44 E. Mifflin Street, 10th Floor Madison, WI 53703 | Electronic Service | No | OFF_SL_20-627_DI-20-627 |
| Jennifer | Peterson | jjpeterson@mnpower.com | Minnesota Power | 30 West Superior Street Duluth, MN 55802 | Electronic Service | No | OFF_SL_20-627_DI-20-627 |
| Hannah | Polikov | hpolikov@aee.net | Advanced Energy Economy Institute | 1000 Vermont Ave, Third Floor Washington, DC 20005 | Electronic Service | No | OFF_SL_20-627_DI-20-627 |
| 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_20-627_DI-20-627 |
| Gregory | Randa | granda@lakecountrypower.com | Lake Country Power | 26039 Bear Ridge Drive Cohasset, MN 55721 | Electronic Service | No | OFF_SL_20-627_DI-20-627 |
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| 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_20-627_DI-20-627 |
| Michael | Reinertson | michael.reinertson@avanteenergy.com | Avant Energy | 220 S. Sixth St. Ste 1300 Minneapolis, Minnesota 55402 | Electronic Service | No | OFF_SL_20-627_DI-20-627 |
| John C. | Reinhardt | N/A | Laura A. Reinhardt | 3552 26th Ave S Minneapolis, MN 55406 | Paper Service | No | OFF_SL_20-627_DI-20-627 |
| Generic Notice | Residential Utilities Division | residential.utilities@ag.state.mn.us | Office of the Attorney General-RUD | 1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131 | Electronic Service | Yes | OFF_SL_20-627_DI-20-627 |
| 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_20-627_DI-20-627 |
| Isabel | Ricker | ricker@fresh-energy.org | Fresh Energy | 408 Saint Peter Street Suite 220 Saint Paul, MN 55102 | Electronic Service | No | OFF_SL_20-627_DI-20-627 |
| Amanda | Rome | amanda.rome@xcelenergy.com | Xcel Energy | 414 Nicollet Mall FL 5 Minneapolis, MN 55401 | Electronic Service | No | OFF_SL_20-627_DI-20-627 |
| Robert K. | Sahr | bsahr@eastriver.coop | East River Electric Power Cooperative | P.O. Box 227 Madison, SD 57042 | Electronic Service | No | OFF_SL_20-627_DI-20-627 |
| Richard | Savelkoul | rsavelkoul@martinsquires.com | Martin & Squires, P.A. | 332 Minnesota Street Ste W2750 St. Paul, MN 55101 | Electronic Service | No | OFF_SL_20-627_DI-20-627 |
| Thomas | Scharff | thomas.scharff@versoco.com | Verso Corp | 600 High Street Wisconsin Rapids, WI 54495 | Electronic Service | No | OFF_SL_20-627_DI-20-627 |

| First Name | Last Name | Email | Company Name | Address | Delivery Method | View Trade Secret | Service List Name |
|-------------|----------------|--------------------------------------|---|---|--------------------|-------------------|-------------------------|
| Larry L. | Schedin | Larry@LLSResources.com | LLS Resources, LLC | 332 Minnesota St, Ste W1390 St. Paul, MN 55101 | Electronic Service | No | OFF_SL_20-627_DI-20-627 |
| Christopher | Schoenherr | cp.schoenherr@smmpa.org | SMMPA | 500 First Ave SW Rochester, MN 55902-3303 | Electronic Service | No | OFF_SL_20-627_DI-20-627 |
| Kay | Schraeder | kschraeder@minnkota.com | Minnkota Power | 5301 32nd Ave S Grand Forks, ND 58201 | Electronic Service | No | OFF_SL_20-627_DI-20-627 |
| Dean | Sedgwick | Sedgwick@Itascapower.com | Itasca Power Company | PO Box 455 Spring Lake, MN 56680 | Electronic Service | No | OFF_SL_20-627_DI-20-627 |
| Maria | Seidler | maria.seidler@dom.com | Dominion Energy Technology | 120 Tredegar Street Richmond, Virginia 23219 | Electronic Service | No | OFF_SL_20-627_DI-20-627 |
| 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_20-627_DI-20-627 |
| Janet | Shaddix Elling | jshaddix@janetshaddix.com | Shaddix And Associates | 7400 Lyndale Ave S Ste 190 Richfield, MN 55423 | Electronic Service | Yes | OFF_SL_20-627_DI-20-627 |
| David | Shaffer | shaff081@gmail.com | Minnesota Solar Energy Industries Project | 1005 Fairmount Ave Saint Paul, MN 55105 | Electronic Service | No | OFF_SL_20-627_DI-20-627 |
| Patricia F | Sharkey | psharkey@environmentallawcounsel.com | Midwest Cogeneration Association. | 180 N LaSalle St Ste 3700 Chicago, IL 60601 | Electronic Service | No | OFF_SL_20-627_DI-20-627 |
| | | | | | | | |

| First Name | Last Name | Email | Company Name | Address | Delivery Method | View Trade Secret | Service List Name |
|------------|-----------|----------------------------------|--------------------------------|--|--------------------|-------------------|-------------------------|
| Bria | Shea | bria.e.shea@xcelenergy.com | Xcel Energy | 414 Nicollet Mall Minneapolis, MN 55401 | Electronic Service | No | OFF_SL_20-627_DI-20-627 |
| Doug | Shoemaker | dougs@charter.net | Minnesota Renewable Energy | 2928 5th Ave S Minneapolis, MN 55408 | Electronic Service | No | OFF_SL_20-627_DI-20-627 |
| Anne | Smart | anne.smart@chargepoint.com | ChargePoint, Inc. | 254 E Hacienda Ave Campbell, CA 95008 | Electronic Service | No | OFF_SL_20-627_DI-20-627 |
| Ken | Smith | ken.smith@ever-greenenergy.com | Ever Green Energy | 305 Saint Peter St Saint Paul, MN 55102 | Electronic Service | No | OFF_SL_20-627_DI-20-627 |
| Ken | Smith | ken.smith@districtenergy.com | District Energy St. Paul Inc. | 76 W Kellogg Blvd St. Paul, MN 55102 | Electronic Service | No | OFF_SL_20-627_DI-20-627 |
| Trevor | Smith | trevor.smith@avantenergy.com | Avant Energy, Inc. | 220 South Sixth Street Suite 1300 Minneapolis, Minnesota 55402 | Electronic Service | No | OFF_SL_20-627_DI-20-627 |
| Joshua | Smith | joshua.smith@sierraclub.org | | 85 Second St FL 2 San Francisco, California 94105 | Electronic Service | No | OFF_SL_20-627_DI-20-627 |
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| Benjamin | Stafford | bstafford@cleanenergyeconymn.org | Clean Energy Economy Minnesota | 400 South 4th St Ste 401-202 Minneapolis, MN 55415 | Electronic Service | No | OFF_SL_20-627_DI-20-627 |
| Sky | Stanfield | stanfield@smwlaw.com | Shute, Mihaly & Weinberger | 396 Hayes Street San Francisco, CA 94102 | Electronic Service | No | OFF_SL_20-627_DI-20-627 |

| First Name | Last Name | Email | Company Name | Address | Delivery Method | View Trade Secret | Service List Name |
|------------|-------------|---------------------------------------|--------------------------------|---|--------------------|-------------------|-------------------------|
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| Byron E. | Starns | byron.starns@stinson.com | STINSON LLP | 50 S 6th St Ste 2600 Minneapolis, MN 55402 | Electronic Service | No | OFF_SL_20-627_DI-20-627 |
| James M | Strommen | jstrommen@kennedy-graven.com | Kennedy & Graven, Chartered | 150 S 5th St Ste 700 Minneapolis, MN 55402 | Electronic Service | No | OFF_SL_20-627_DI-20-627 |
| Eric | Swanson | eswanson@winthrop.com | Winthrop & Weinstine | 225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629 | Electronic Service | No | OFF_SL_20-627_DI-20-627 |
| Thomas P. | Sweeney III | tom.sweeney@easycleane nergy.com | Clean Energy Collective | P O Box 1828 Boulder, CO 80306-1828 | Electronic Service | No | OFF_SL_20-627_DI-20-627 |
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| First Name | Last Name | Email | Company Name | Address | Delivery Method | View Trade Secret | Service List Name |
|------------|-----------|--------------------------------------|-------------------------------------|---|--------------------|-------------------|-------------------------|
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| First Name | Last Name | Email | Company Name | Address | Delivery Method | View Trade Secret | Service List Name |
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| First Name | Last Name | Email | Company Name | Address | Delivery Method | View Trade Secret | Service List Name |
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| | | | | | | | |

| First Name | Last Name | Email | Company Name | Address | Delivery Method | View Trade Secret | Service List Name |
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| First Name | Last Name | Email | Company Name | Address | Delivery Method | View Trade Secret | Service List Name |
|------------|------------|------------------------------------|--|--|--------------------|-------------------|------------------------|
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| First Name | Last Name | Email | Company Name | Address | Delivery Method | View Trade Secret | Service List Name |
|------------|-----------|---------------------------------------|----------------------------------|---|--------------------|-------------------|------------------------|
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| First Name | Last Name | Email | Company Name | Address | Delivery Method | View Trade Secret | Service List Name |
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|------------|-----------|------------------------------|---|---|--------------------|-------------------|------------------------|
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| 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 |
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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_20-680_Official |
| Joyce | Peppin | joyce@mrea.org | Minnesota Rural Electric Association | 11640 73rd Ave N Maple Grove, MN 55369 | Electronic Service | No | OFF_SL_20-680_Official |
| Mary Beth | Peranteau | mperanteau@wheelerlaw.com | Wheeler Van Sickle & Anderson SC | 44 E. Mifflin Street, 10th Floor Madison, WI 53703 | 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 |
| Gregory | Randa | granda@lakecountrypower.com | Lake Country Power | 26039 Bear Ridge Drive Cohasset, MN 55721 | Electronic Service | No | OFF_SL_20-680_Official |
| 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@avanteenergy.com | Avant Energy | 220 S. Sixth St. Ste 1300 Minneapolis, Minnesota 55402 | Electronic Service | No | OFF_SL_20-680_Official |
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| 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.state.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.com | 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.com | Verso Corp | 600 High Street Wisconsin Rapids, WI 54495 | Electronic Service | No | OFF_SL_20-680_Official |
| Larry L. | Schedin | Larry@LLSResources.com | LLS Resources, LLC | 332 Minnesota St, Ste W1390 St. Paul, MN 55101 | Electronic Service | No | OFF_SL_20-680_Official |
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| Christopher | Schoenherr | cp.schoenherr@smmpa.org | SMMPA | 500 First Ave SW Rochester, MN 55902-3303 | Electronic Service | No | OFF_SL_20-680_Official |
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| 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 |
| David | Shaffer | shaff081@gmail.com | Minnesota Solar Energy Industries Project | 1005 Fairmount Ave Saint Paul, MN 55105 | Electronic Service | No | OFF_SL_20-680_Official |
| Patricia F | Sharkey | psharkey@environmentallawcounsel.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 |

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| 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 |
| 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 |
| Benjamin | Stafford | bstafford@cleanenergyeconymn.org | Clean Energy Economy Minnesota | 400 South 4th St Ste 401-202 Minneapolis, MN 55415 | Electronic Service | No | OFF_SL_20-680_Official |
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| 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 |

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| Karen | Turnboom | karen.turnboom@versocom | Verso Corporation | 100 Central Avenue Duluth, MN 55807 | Electronic Service | No | OFF_SL_20-680_Official |
| Andrew | Twite | twite@fresh-energy.org | Fresh Energy | 408 St. Peter Street, Ste. 220 St. Paul, MN 55102 | Electronic Service | No | OFF_SL_20-680_Official |
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| Thomas | Tynes | jjazynka@energyfreedomcoalition.com | Energy Freedom Coalition of America | 101 Constitution Ave NW Ste 525 East Washington, DC 20001 | Electronic Service | No | OFF_SL_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 |
| Nikhil | Vijaykar | NVijaykar@elpc.org | Enviornental Law & Policy Center | N/A | Electronic Service | No | OFF_SL_20-680_Official |
| Curt | Volkman | curt@newenergy-advisors.com | Fresh Energy | N/A | Electronic Service | No | OFF_SL_20-680_Official |
| Jonathan | Wallach | Jwallach@resourceinsight.com | Resource Insight, Inc. | 5 Water St. Arlington, MA 02476 | Electronic Service | No | OFF_SL_20-680_Official |
| Roger | Warehime | roger.warehime@owatonnautilities.com | Owatonna Public Utilities | 208 South WalnutPO 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 |
| Scott M. | Wilensky | scott.wilensky@xcelenergy.com | Xcel Energy | 7th Floor 414 Nicollet Mall Minneapolis, MN 554011993 | Electronic Service | No | OFF_SL_20-680_Official |
| 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 |
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| 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 |
| Patrick | Zomer | Patrick.Zomer@lawmoss.com | Moss & Barnett a Professional Association | 150 S. 5th Street, #1200 Minneapolis, MN 55402 | Electronic Service | No | OFF_SL_20-680_Official |