

BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

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

Chair
Commissioner
Commissioner
Commissioner
Commissioner

In the Matter of a Petition by Citizens Utility
Board of Minnesota to Adopt Open
Data Access Standards

ISSUE DATE: November 20, 2020

DOCKET NO. E,G-999/M-19-505

In the Matter of a Commission Inquiry into
Privacy Policies of Rate-Regulated
Energy Utilities

DOCKET NO. E,G-999/CI-12-1344

ORDER ADOPTING OPEN DATA
ACCESS STANDARDS AND
ESTABLISHING FURTHER
PROCEEDINGS

PROCEDURAL HISTORY

On August 6, 2019, Citizens Utility Board of Minnesota (CUB) filed a petition (the Petition) to initiate a proceeding to adopt Open Data Access Standards (the Standards) for the sharing of aggregated or anonymized customer energy use data (CEUD).

On August 22, 2019, the Commission issued a notice requesting comment on the Petition.

By October 15, 2019, the following parties submitted comments:

- Advanced Energy Management Alliance (AEMA)
- Center for Energy and Environment (CEE)
- CenterPoint Energy
- City of Minneapolis (Minneapolis)
- Clean Energy Economy Minnesota (CEEM)
- CUB
- Department of Commerce – Division of Energy Resources (the Department)
- Dakota Electric Association
- Fresh Energy, National Housing Trust & Natural Resources Defense Council (Fresh Energy, et al.)
- Great Plains Natural Gas Company
- Minnesota Energy Resources Corporation (MERC)
- Minnesota Large Industrial Group (MLIG)
- Minnesota Power
- Minnesota Rural Electric Association

- Minnesota Valley Electric Cooperative
- Office of the Attorney General – Residential Utilities and Antitrust Division (OAG)
- Otter Tail Power Company
- Xcel Energy

By November 5, 2019, the following parties submitted reply comments:

- AEMA
- CUB
- CenterPoint Energy
- Fresh Energy
- LHB
- Minneapolis
- MLIG
- OAG
- Otter Tail Power Company
- Xcel Energy

On December 2, 2019, the Commission issued a Notice of Supplemental Comment Period requesting comment on the amended Standards contained in CUB's reply comments.

By December 16, 2019, the following parties submitted supplemental comments:

- CEE
- CenterPoint Energy
- Dakota Electric Association
- Department
- Fresh Energy et al.
- Great Plains Natural Gas Company
- Minneapolis
- Minnesota Power
- MLIG
- OAG
- Otter Tail Power Company
- Xcel Energy

On July 15, 2020, CUB filed additional amendments to its proposed Open Data Access Standards.

On July 16, 2020, the Commission met to consider the Petition.¹

¹ At the agenda meeting, the Commission granted MLIG's motion to admit Jessica L. Bayles pro hac vice to represent MLIG in this matter.

FINDINGS AND CONCLUSIONS

I. Background

Data regarding customer energy use can help people—including people other than the customers in question—identify opportunities to pursue energy efficiency, conservation, and economic competitiveness, and to measure the effectiveness of those efforts. This data may be helpful in permitting greater use of electricity from renewable sources and reducing greenhouse gas emissions. But disclosure of CEUD could reveal confidential facts about the consumer, and potentially about the energy distribution system.

For example, CEUD is an important component of energy conservation “benchmarking,” which refers to the collection of CEUD for the purpose of measuring energy-use reductions resulting from conservation and efficiency efforts. In other words, one cannot measure whether energy-conservation initiatives have been successful without gathering CEUD from before and after those initiatives were implemented.

In 2012, the Commission initiated an investigation into the collection, storage, and dissemination of customer data by rate-regulated utilities. To assist with this investigation, the Commission convened a workgroup to explore and recommend policies on the appropriate use and limitations on use of CEUD while balancing customer privacy and the state’s energy goals.² The workgroup met 13 times between 2013 and 2015, and over 30 stakeholder groups participated in the workgroup, filed comments, or both. An administrative law judge presided over the workgroup and issued two reports summarizing the workgroup’s findings and recommendations.

In January 2017, the Commission issued an order (the January 2017 Order) taking the following actions:

- defining CEUD as “data collected from the utility customer meters that reflects the quantity, quality, or timing of customers’ natural gas or electric usage or electricity production;”
- declaring that utilities should “refrain from disclosing CEUD without the customer’s consent unless the utility has adequately protected the customer’s anonymity;”
- directing each utility to file its policies on aggregating and releasing CEUD and to track and report costs associated with CEUD requests; and
- soliciting comment on a model form by which customers may give informed consent to the release of their data.³

² *In the Matter of a Commission Inquiry into Privacy Policies of Rate-Regulated Energy Utilities*, Docket No. E,G-999/CI-12-1344, Order Establishing Procedures for Further Comment and for Working Group (June 17, 2013).

³ *Id.*

In the January 2017 Order, the Commission decided that “[a]t this time the Commission will not specify any one technique or procedure a utility must follow to adequately protect a customer’s anonymity.”⁴ Rather, the Commission directed “utilities that already have a practice for releasing CEUD to third parties after taking steps to anonymize the data—for example, by aggregating that data with other customers’ data before releasing it—should file these practices with the Commission.”⁵ Since the January 2017 Order, Commission action on data access and customer privacy has focused on reviewing and approving CEUD release consent forms and customer notices.⁶

II. Proposed Open Data Access Standards

CUB’s proposed Open Data Access Standards would establish statewide rules and practices governing third-party access to CEUD, replacing the current system where each utility sets its own standards for releasing CEUD. CUB argued that since the Commission’s last action on data access and customer privacy, “data access principles have been developed nationally, standards have been tested in the state of Illinois, and data access has proven to provide valuable information that advances the public interest in efficient, affordable electricity without putting customers’ privacy at risk.”⁷

As CUB explained, the Standards “would address the collection and sharing of data in two formats: (1) the collection of energy use data of customers within defined geographic areas aggregated into single points (aggregated CEUD), and (2) individual sets of interval use data, anonymized and grouped within defined geographic areas (anonymized CEUD).”⁸ Aggregating and anonymizing CEUD are the two main methods for protecting customer privacy while allowing CEUD access. The Standards would require utilities to make available aggregated and/or anonymized CEUD when requested by a qualified third party.

CUB proposed an aggregation standard that would limit aggregated data sets to include CEUD from no fewer than 4 customers and preclude a single customer’s energy use constituting more than 50 percent of total energy consumption for the requested data set. CUB proposed an anonymization standard that would limit anonymized data sets to include CEUD from no fewer than 15 customers, and a single customer’s energy use would not constitute more than 15 percent of total energy consumption for the data set.

CUB submitted two sets of amendments to the proposed Standards in response to stakeholder comments.⁹ For example, CUB initially proposed to apply the Standards only to electric utilities

⁴ *Id.*, at 8.

⁵ *Id.*

⁶ *See, e.g., In the Matter of a Commission Inquiry into Privacy Policies of Rate-Regulated Energy Utilities*, Docket No. E,G-999/CI-12-1344, Order Approving Customer Energy Use Data Consent Form (June 9, 2017).

⁷ Petition, at 4.

⁸ Petition, at 1.

⁹ CUB submitted the first set of amendments with its reply comments and the second set of amendments on July 15, 2020.

but amended the Standards to also apply to natural gas utilities. CUB also initially proposed different definitions for CEUD and personally identifiable information than the Commission has adopted, but CUB amended the Standards to use the Commission's definitions for those terms.

III. Parties' Comments

Parties filed extensive and detailed comments regarding CUB's proposed Open Data Access Standards and amendments to those standards. Comments were generally divided between support and opposition to adoption of the proposed Open Data Access Standards. The parties' positions are summarized below.

A. Supporters of the Standards

CEEM, AEMA, Minneapolis, LHB, and Fresh Energy, et al., supported CUB's proposed Open Data Access Standards, arguing that access to CEUD is necessary to advance initiatives such as energy conservation and time-of-use rates. They argued that a uniform approach is preferable to the current utility-specific standards, and that the new standards will improve access to data while protecting customer privacy. These parties cited the study by Pacific Northwest National Laboratory finding that CUB's proposed 4/50 standard for building aggregation adequately protected customer privacy.

Minneapolis emphasized the unique data requirements of local governments and argued that they should have access to CEUD in their jurisdictions. Minneapolis argued that the current data access rules have significantly impeded the city's ability to conduct and evaluate its energy programs, and noted that a new ordinance requiring landlords to provide prospective tenants with energy use data could be hampered by the current data access rules.

CenterPoint Energy indicated that it is possible to develop uniform standards while protecting customer privacy and limiting compliance costs, and it recommended a Commission process to allow parties to bring forward new privacy-related issues. The utility expressed concern with allowing CEUD access to third parties other than government entities, nonprofit organizations, and nonprofit research institutions.

B. Opponents of the Standards

The Department and OAG recommended that the Commission deny the Petition and not adopt any version of the Open Data Access Standards. The Department offered a detailed history of past Commission proceedings and orders related to data access and customer privacy, and it noted that the Commission's previous decisions resulted from extensive stakeholder input reflecting a balanced outcome. The Department cautioned that changing past Commission decisions could have unintended consequences and argued that the current approach to data access and customer privacy is working well. OAG argued that the Open Data Access Standards do not adequately protect customer privacy and that the Commission should not adopt a one-size-fits-all approach to data access.

The following utilities and utility groups filed comments opposing adoption of the Standards: Dakota Electric Association, Great Plains Natural Gas Company, MERC, Minnesota Valley Electric Cooperative, Minnesota Rural Electric Association, Minnesota Power, Otter Tail Power

Company, and Xcel Energy. These parties argued that the current data-access regime works well and should not be changed. They expressed concern with a requirement to enter into contracts with third parties requesting information, and Xcel questioned whether the Commission has the authority to enforce such a requirement. They also warned that complying with the proposed Standards could require significant financial resources and staff time. Xcel Energy suggested a narrower approach that would set aggregation standards for the two most requested use cases: whole building data and aggregated reports for communities and local governments.

MLIG reiterated its concerns about releasing CEUD without customer authorization and argued that the proposed Standards are insufficient to protect customer privacy. MLIG emphasized the unique privacy concerns of large-industrial customers and the potential to estimate the energy usage of large-industrial facilities, effectively eliminating the effort at protecting those customers' privacy. MLIG urged the Commission to exempt customers with a peak demand of five megawatts or more if it adopts the Open Data Access Standards and to allow customers with a peak demand of one megawatt or more to opt out.

CEE expressed concerns with several aspects of CUB's proposed Open Data Access Standards and supported Xcel's suggested approach to set aggregation standards for whole building data and aggregated reports for communities and local governments.

The Commission received three public comments from individuals objecting to the sharing of their CEUD from smart meters.

IV. Commission Action

The Commission is grateful to the parties for developing a robust record that addresses the issues surrounding data access and customer privacy. Upon reviewing this record and considering past Commission action in this area, the Commission concludes that the public interest would be served by adopting the attached Open Data Access Standards for electric and natural gas utilities with more than 50,000 customers for a specific set of applications.

At this time the Commission will apply the Standards to whole-building aggregated CEUD for building owners and benchmarking purposes. Utilities will be required to provide building-level and public-purpose data aggregation without charge to building owners/managers, local units of government, and non-profit organizations that use that data for public interest energy research.

The Commission concludes that incrementally applying these standards will help maintain the appropriate balance between customer privacy and access to CEUD; this access will help advance the state's energy goals, including potential energy savings and reductions in greenhouse gas emissions. By allowing only the entities listed above to access whole-building aggregated CEUD for benchmarking purposes at this time, stakeholders will be able to test out the effectiveness of these Standards at little risk to customer privacy. It is important to continue improving these Standards as utilities explore innovations that implicate CEUD, such as grid modernization, advanced-metering infrastructure, and time-differentiated rates.

The Commission recognizes the unique privacy concerns of large-industrial facilities; these customers operate in highly competitive industries, and energy costs represent a significant portion of their operating budgets. For these reasons, the Open Data Access Standards will not

apply to commercial/industrial customers with peak demands greater than 5 megawatts. And, as described below, the Commission will further investigate whether a different threshold would be appropriate.

In order to further develop the record on how best to refine the Standards, the Commission will request comment on the following topics:

- Whether the aggregation screens should be segmented into two (or more) distinct aggregation screens, with different threshold levels and requirements, ranging from building-level to community level, including consideration of multi-unit single owner rental properties and of the unique roles of building owners/managers and of local governments;
- Refinement of specific provisions of the contract requirements for anonymized data access;
- Establishment of uniform customer access forms;
- Identification of opportunities to appropriately streamline the data access process to reduce the total cost of aggregating and releasing data;
- Ascertaining the appropriate threshold for limiting application of the Standards to commercial/industrial natural gas and electric customers; and
- Aggregated CEUD for communities and other local units of government.

The Commission will request that the Commissioner of Commerce seek authority from the Commissioner of Management and Budget to incur costs necessary to retain an independent expert to provide comments on the topics listed above and other issues arising from the Open Data Access Standards, pursuant to Minnesota Statutes section 216B.62, subd. 8. Once MMB approves, the Executive Secretary will coordinate with the Commissioner of Commerce as needed, including to develop of the scope and schedule of the continued investigation. The Commission will direct the Executive Secretary to request technical assistance from the Regulatory Assistance Project, U.S. Department of Energy, or another expert group.

The Commission will require further filings from utilities as outlined below and will delegate to the Executive Secretary the authority to issue notices, set schedules, and designate comment periods as needed.

ORDER

1. The Commission approves the Open Data Access Standards (attached to this order) for electric and natural gas utilities. The Open Data Access Standards will be implemented in a multi-step process. At this time the Commission will apply the standards to whole building aggregated customer energy usage data (CEUD) for building owners and benchmarking purposes.

2. The Open Data Access Standards do not apply to commercial/industrial customers with peak demands greater than 5 megawatts.
3. Building level and public purpose data aggregation will be provided by utilities without charge to building owners/managers, to local units of government, and to non-profit organizations that use that data for public interest energy research.
4. The Commission will continue to develop the record on further refinement of the Open Data Access Standards by requesting comments including the following topics:
 - a. Whether the aggregation screens should be segmented into two (or more) distinct aggregation screens, with different threshold levels and requirements, ranging from building-level to community level, including consideration of multi-unit single owner rental properties and of the unique roles of building owners/managers and of local governments;
 - b. Refinement of specific provisions of the contract requirements for anonymized data access;
 - c. Establishment of uniform customer access forms;
 - d. Identification of opportunities to appropriately streamline the data access process to reduce the total cost of aggregating and releasing data;
 - e. Ascertaining the appropriate threshold for limiting application of the Standards to commercial/industrial natural gas and electric customers; and
 - f. Aggregated CEUD for communities and other local units of government.
5. The Commission requests that the Commissioner of Commerce seek authority from the Commissioner of Management and Budget to incur costs necessary to retain an independent expert to provide comments on the topics listed above and other issues arising from the Open Data Access Standards, pursuant to Minnesota Statutes section 216B.62, subd. 8. Once MMB approves, the Executive Secretary will coordinate with the Commissioner of Commerce, including development of the scope and schedule. The Commission directs the Executive Secretary to request technical assistance from the Regulatory Assistance Project, U.S. Department of Energy, or another expert group.
6. Each regulated utility shall file its aggregation and release policies demonstrating compliance with this order within 30 days of this order.
7. Each regulated utility shall file an annual report, beginning March 1, 2021, for the calendar year 2020, that will include the following:
 - a. Current aggregation and release policies;
 - b. A summary of requests received for CEUD and its costs of aggregating and releasing that data; and

- c. A discussion of which additional use cases should be considered by the Commission, or why no additional use cases should be added at this time.
8. The Commission hereby delegates authority to the Executive Secretary to issue notices, set schedules, and designate comment periods as needed.
9. This order shall become effective immediately.

BY ORDER OF THE COMMISSION



Will Seuffert
Executive Secretary



This document can be made available in alternative formats (e.g., large print or audio) by calling 651.296.0406 (voice). Persons with hearing or speech impairment may call using their preferred Telecommunications Relay Service or email consumer.puc@state.mn.us for assistance.

Open Data Access Standards

I. Purpose and Scope

- A. These standards apply to investor-owned electric or gas public utilities with greater than 50,000 customers within the state of Minnesota. They are intended to set standards for the collection and sharing of customer energy use data (CEUD) for use by third parties, as defined below. In particular, these standards are designed to ensure that:
 - (1) Third parties may access aggregated or anonymized, disaggregated CEUD;
 - (2) The data be identified at the closest level of geographical specificity possible to maintain customer anonymity and at the finest practicable time interval;
 - (3) The utility, to the best of its ability, shall in a timely manner furnish this data in a consistent, standard format aligned with industry best practices regarding ease of access and granularity of data; and
 - (4) Unless authorized by a customer, a third party shall not have access to any personally identifiable information for a customer.

II. Definitions

- A. “Aggregated customer energy use data” refers to the data of individual customers located in a defined geographical area, which is combined into one collective data point per time interval.
- B. “Anonymized customer energy use data” refers to the data of individual customers, which has been modified sufficiently to prevent the release of personally identifiable information, collected over a number of time intervals from a defined geographical area.
- C. “Customer” means a person contracting for or purchasing electric or natural gas service at retail from an investor owned electric or gas public utility with customers greater than 50,000 within the state of Minnesota.
- D. “Customer energy use data” (CEUD) refers to data collected from the utility customer meters that reflect the quantity, quality, or timing of customers’ natural gas or electric usage or electricity production. For the purposes of these Open Data Access Standards, CEUD includes data regarding:
 - (1) the amount and timing of energy use and production;
 - (2) peak load contributions and the amount and timing of demand; and
 - (3) rate class.
- E. “Interval data” means CEUD that is collected and compiled for a particular interval of time—including but not limited to intervals of minutes, hours, or day, but no greater than one month—for an individual customer or for a collective data set.

- F. "Personally identifiable information" (PII) means customer data which can be used to distinguish or trace the identity of an individual (e.g., name, social security number, biometric records, etc.) alone, or when combined with other personal or identifying information which is linked or linkable to a specific individual (e.g., date and place of birth, mother's maiden name, etc.).
- G. "Tax exempt organization" means a business entity organized in the United States for a nonprofit purpose and that is exempt from paying federal income tax pursuant to the Internal Revenue Code.
- H. "Third party" means a person or entity who requests CEUD other than their own from the utility that maintains the data.
- I. "Utility" means an investor-owned electric or gas public utility with customers greater than 50,000 within the state of Minnesota.

III. Third Party Access to Customer Energy Use Data and Customer Privacy Protection

- A. A utility must prepare and make available aggregated and/or anonymized CEUD upon the written or electronic request of any qualifying third party. The procedure a utility uses to allow a person to request this data must be (1) convenient for the typical third party, and (2) available on the utility's website. Such sets must consist of the past 24 months of historical CEUD in the smallest interval practicable unless otherwise requested by the customer or authorized third party.
- B. CEUD provided may include aggregated and anonymized sets of customer energy use data.
 - (1) Aggregated CEUD
 - (i) Aggregation standard: An aggregated customer energy use data set may include CEUD from no fewer than 4 customers. A single customer's energy use must not constitute more than 50 percent of total energy consumption for the requested data set.
 - (ii) CEUD data sets containing 3 or fewer customers or with a single customer's energy use constituting more than 50 percent of total energy consumption may be provided upon the written consent of (1) all customers included in the requested data set, in cases of 3 or fewer customers, and/or (2) any customer constituting more than 50 percent of total energy consumption for the requested data set.
 - (iii) Aggregated CEUD may be requested by customer class and/or building or property, defined municipal boundary, county boundary, or U.S. postal code, provided that no data set violates paragraphs (i) and (ii).
 - (iv) Aggregated CEUD may be requested by:
 - (a) Tax-exempt organizations based within the United States;

- (b) U.S. Federal Government agencies and subdivisions thereof; State of Minnesota government agencies, boards, and/or commissions; local government entities with jurisdiction within Minnesota; and government entities of federally recognized tribes that share Minnesota's geography; and
 - (c) Property owners or managers, so long as the CEUD requested applies only to the property the requestor owns or manages.
- (2) Anonymized CEUD
 - (i) Anonymization standard: Anonymized data sets may include CEUD from no fewer than 15 customers. A single customer's energy use must not constitute more than 15 percent of total energy consumption for the data set.
 - (ii) A unique customer identification code shall be assigned to each anonymous customer in a data set. The customer identification code shall remain consistent within the data set.
 - (iii) Anonymized data sets may be requested by customer class and/or defined municipal boundary, county boundary, or U.S. postal code area, provided that no data set violates paragraph (i).
 - (iv) Anonymized CEUD may be requested by:
 - (a) Tax-exempt organizations based within the United States;
 - (b) U.S. Federal Government agencies and subdivisions thereof; State of Minnesota government agencies, boards, and/or commissions; local government entities with jurisdiction within Minnesota; and government entities of federally recognized tribes that share Minnesota's geography.
 - (c) Entities that provide or seek to provide demand response, energy efficiency, or other services to a utility may access anonymized data for the sole purpose of providing such services or preparing a proposal to the utility to do so.
 - (v) A utility may refuse to provide CEUD to a third party requesting anonymized data if the third party does not sign a contract with the utility that must at a minimum:
 - (a) Prohibit the third party from attempting to reverse engineer data or re-identify customers included in a data set;
 - (b) Require a third-party to disclose all of the third party's employees, subcontractors, or agents with access to the data set at the time of the contract and require this to be updated if it changes during the life of the contract;

- (c) Prohibit the third party from disclosing anonymized data except to the third party's personnel or to entities with whom the third party has a contractual relationship for the purpose of conducting an investigation with the anonymized data;
 - (d) Require the third a party to have contractual terms for disclosure with contracted entities noted in paragraphs (b) and (c) above that are equivalent to utilities contract here in and provide executed copies of those agreements in advance or when they're made;
 - (e) Hold the third party responsible for its actions with the data;
 - (f) Require the third party to promptly delete data and notify the utility if it discovers any PII contained in the data set; and
 - (g) Require the third party to state its intended use for the data.
- (3) Each utility covered under these standards must file their contract form developed pursuant to 2(v) above with the Commission.
 - (4) The Commission may set alternative aggregation or anonymization standards upon the petition of any party, as long as those new standards do not restrict public access to energy data deemed in the public interest nor allow for the identification of individual customers within a data set.
- C. Notwithstanding section III.B, a utility may refuse to provide aggregated or anonymized CEUD when it reasonably believes the data release would allow the third party to re-identify customers, violate the terms of the contract in 2(v) above, or otherwise use the data in violation of these standards.

IV. Data Type and Format

- A. Utilities will provide CEUD in as short intervals as practicable, with 15-minute intervals recommended where utility data collection infrastructure allows.
- B. Utilities will work with third parties to provide CEUD in a manner that reasonably facilitates ease of access, ease of CEUD preparation, and comports with accepted data handling standards.

V. Delivery of Data

- A. Utilities shall work with third parties to facilitate timely and secure delivery of CEUD. Disputes may be brought to the Commission for resolution.

VI. Fees and Cost Recovery

- A. A utility may charge the requester a fee to prepare and supply CEUD. A utility charging a data access fee authorized by this section must:

- (1) base the fee amount on the actual costs incurred by the utility to create and deliver the requested data;
- (2) consider the reasonable value of the data prepared to the utility and, if appropriate, reduce the fee assessed to the requesting person;
- (3) provide the requesting person with an estimate and explanation of the fee; and
- (4) collect the fee before preparing or supplying the requested data.

CERTIFICATE OF SERVICE

I, Leesa Norton, hereby certify that I have this day, served a true and correct copy of the following document to all persons at the addresses indicated below or on the attached list by electronic filing, electronic mail, courier, interoffice mail or by depositing the same enveloped with postage paid in the United States mail at St. Paul, Minnesota.

Minnesota Public Utilities Commission
ORDER ADOPTING OPEN DATA ACCESS STANDARDS AND
ESTABLISHING FURTHER PROCEEDINGS

Docket Number: E,G-999/M-19-505; E,G-999/CI-12-1344

Dated this 20th day of November, 2020

/s/ Leesa Norton

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Roger	Colton	roger@fsconline.com		34 warwick road belmont, ma 02478	Electronic Service	No	OFF_SL_19-505_Official
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_19-505_Official
Riley	Conlin	riley.conlin@stoel.com	Stoel Rives LLP	33 S. 6th Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-505_Official

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Nicolle	Kupser	nkupser@greatermngas.com	Greater Minnesota Gas, Inc. & Greater MN Transmission, LLC	1900 Cardinal Ln PO Box 798 Faribault, MN 55021	Electronic Service	No	OFF_SL_19-505_Official
Douglas	Larson	dlarson@dakotaelectric.com	Dakota Electric Association	4300 220th St W Farmington, MN 55024	Electronic Service	No	OFF_SL_19-505_Official
Erica	Larson	erica.larson@centerpointenergy.com	CenterPoint Energy	505 Nicollet Avenue P.O. Box 59038 Minneapolis, Minnesota 55459-0038	Electronic Service	No	OFF_SL_19-505_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_19-505_Official
Kevin	Lewis	kl@bomampls.org	Greater Minneapolis BOMA	Suite 610 121 South 8th Street Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-505_Official
Todd	Liljenquist	todd.liljenquist@mmha.com	Minnesota Multi Housing Association (MHA)	1600 West 82nd Street, Suite 110 Minneapolis, MN 55431	Electronic Service	No	OFF_SL_19-505_Official
Sarah	Marquardt	smarquardt@mcknight.org	The McKnight Foundation	710 S 2nd St Minneapolis, MN 55401	Electronic Service	No	OFF_SL_19-505_Official
Kevin	Marquardt	Kevin.Marquardt@CenterPointEnergy.com	CenterPoint Energy	505 Nicollet Mall PO Box 59038 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-505_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
J.B.	Matthews	N/A	Cushman & Wakefield/NorthMarq	3500 American Blvd W - #200 Minneapolis, MN 55431	Paper Service	No	OFF_SL_19-505_Official
Craig	McDonnell	Craig.McDonnell@state.mn.us	MN Pollution Control Agency	520 Lafayette Road St. Paul, MN 55101	Electronic Service	No	OFF_SL_19-505_Official
David	Moeller	dmoeller@allte.com	Minnesota Power	30 W Superior St Duluth, MN 558022093	Electronic Service	No	OFF_SL_19-505_Official
Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP	33 South Sixth St Ste 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-505_Official
Eric	Muschler	emuschler@mcknight.org	The McKnight Foundation	710 South 2nd Street Minneapolis, MN 55401	Electronic Service	No	OFF_SL_19-505_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_19-505_Official
Greg	Palmer	gpalmer@gretermngas.com	Greater Minnesota Gas, Inc. & Greater MN Transmission, LLC	1900 Cardinal Ln PO Box 798 Faribault, MN 55021	Electronic Service	No	OFF_SL_19-505_Official
Joyce	Peppin	joyce@mrea.org	Minnesota Rural Electric Association	11640 73rd Ave N Maple Grove, MN 55369	Electronic Service	No	OFF_SL_19-505_Official
Tammy	Pust	Tammy.Pust@state.mn.us	Office of Administrative Hearings	PO Box 64620 St. Paul, MN 55164-0620	Electronic Service	No	OFF_SL_19-505_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Phyllis	Reha	phyllisreha@gmail.com		3656 Woodland Trail Eagan, MN 55123	Electronic Service	No	OFF_SL_19-505_Official
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_19-505_Official
Richard	Savelkoul	rsavelkoul@martinsquires.com	Martin & Squires, P.A.	332 Minnesota Street Ste W2750 St. Paul, MN 55101	Electronic Service	No	OFF_SL_19-505_Official
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th PI E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_19-505_Official
Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates	7400 Lyndale Ave S Ste 190 Richfield, MN 55423	Electronic Service	No	OFF_SL_19-505_Official
Brendon	Slotterback	bslotterback@mcknight.org	The McKnight Foundation	710 S 2nd St Minneapolis, MN 55401	Electronic Service	No	OFF_SL_19-505_Official
Peggy	Sorum	peggy.sorum@centerpointenergy.com	CenterPoint Energy	505 Nicollet Mall Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-505_Official
Kristin	Stastny	kstastny@taftlaw.com	Taft Stettinius & Hollister LLP	2200 IDS Center 80 South 8th St Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-505_Official
Cary	Stephenson	cStephenson@otpc.com	Otter Tail Power Company	215 South Cascade Street Fergus Falls, MN 56537	Electronic Service	No	OFF_SL_19-505_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Lynnette	Sweet	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_19-505_Official
Jason	Topp	jason.topp@lumen.com	CenturyLink	200 S 5th St Ste 2200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-505_Official
Andrew	Twite	twite@fresh-energy.org	Fresh Energy	408 St. Peter Street, Ste. 220 St. Paul, MN 55102	Electronic Service	No	OFF_SL_19-505_Official
Jenna	Warmuth	jwarmuth@mnpower.com	Minnesota Power	30 W Superior St Duluth, MN 55802-2093	Electronic Service	No	OFF_SL_19-505_Official
Patricia	Whitney	patricia@pwhitneylaw.com	St. Paul Assn of Responsible Landlords	627 Snelling Avenue South St. Paul, MN 55116	Electronic Service	No	OFF_SL_19-505_Official
Elizabeth	Wilson	ewilson@umn.edu	University of Minnesota	301 19th Ave South Minneapolis, Minnesota 55455	Electronic Service	No	OFF_SL_19-505_Official
Josh	Winters	josh@mpirg.org	Minnesota Public Interest Research Group	2722 University Ave SE Minneapolis, MN 55414	Electronic Service	No	OFF_SL_19-505_Official
Robyn	Woeste	robynwoeste@alliantenergy.com	Interstate Power and Light Company	200 First St SE Cedar Rapids, IA 52401	Electronic Service	No	OFF_SL_19-505_Official
Mary	Wolter	mary.wolter@wecenergygroup.com	Minnesota Energy Resources Corporation (HOLDING)	231 West Michigan St Milwaukee, WI 53203	Electronic Service	No	OFF_SL_19-505_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Jeff	Zethmayr	jzethmayr@citizensutilityboard.org	Citizens Utility Board	309 W. Washington, Ste 800 Chicago, IL 60606	Electronic Service	No	OFF_SL_19-505_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Tamie A.	Aberle	tamie.aberle@mdu.com	Great Plains Natural Gas Co.	400 North Fourth Street Bismarck, ND 585014092	Electronic Service	No	OFF_SL_12-1344_Official
Chad	Adams	ChadA@swmhp.org	Southwest Minnesota Housing Partnership	2401 Broadway Ave Slayton, MN 56172	Electronic Service	No	OFF_SL_12-1344_Official
Michael	Ahern	ahern.michael@dorsey.com	Dorsey & Whitney, LLP	50 S 6th St Ste 1500 Minneapolis, MN 554021498	Electronic Service	No	OFF_SL_12-1344_Official
Kristine	Anderson	kanderson@greatermngas.com	Greater Minnesota Gas, Inc. & Greater MN Transmission, LLC	1900 Cardinal Lane PO Box 798 Faribault, MN 55021	Electronic Service	No	OFF_SL_12-1344_Official
Arnie	Anderson	ArnieAnderson@MinnCAP.org	Minnesota Community Action Partnership	MCIT Building 100 Empire Drive, Suite 202 St. Paul, MN 55103	Electronic Service	No	OFF_SL_12-1344_Official
Martin S.	BeVier	bevi0022@umn.edu		4001 Grand Ave South # 3 Minneapolis, MN 55409	Electronic Service	No	OFF_SL_12-1344_Official
Nichol	Beckstrand	Nichol.beckstrand@mmha.com	Minnesota Multi Housing Association	1600 W 82nd St Ste 110 Minneapolis, MN 55431	Electronic Service	No	OFF_SL_12-1344_Official
Scott	Bohler	scott.bohler@ftr.com	Frontier Communications Corporation	2378 Wilshire Blvd Mound, MN 55364-1652	Electronic Service	No	OFF_SL_12-1344_Official
Jon	Braman	jbraman@brightpower.com	Bright Power, Inc.	11 Hanover Square, 21st floor New York, NY 10005	Electronic Service	No	OFF_SL_12-1344_Official
Sheri	Brezinka	sbrezinka@usgbc.org	USGBC-Minnesota Chapter	701 Washington Ave. N Suite 200 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_12-1344_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Annika	Brink	abrink@nhtinc.org	National Housing Trust	1101 30th Street NW Suite 100A Washington, DC 20007	Electronic Service	No	OFF_SL_12-1344_Official
Charlie	Buck	charlie.buck@oracle.com	Oracle	760 Market St FL 4 San Francisco, CA 94102	Electronic Service	No	OFF_SL_12-1344_Official
Michael J.	Bull	mbull@mncee.org	Center for Energy and Environment	212 Third Ave N Ste 560 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_12-1344_Official
Richard	Carter	rick.carter@lhbcorp.com		2780 Shadywood Rd Excelsior, MN 55331-9599	Electronic Service	No	OFF_SL_12-1344_Official
Brent	Christensen	brentc@mnta.org	Minnesota Telecom Alliance	1000 Westgate Drive, Ste 252 St. Paul, MN 55117	Electronic Service	No	OFF_SL_12-1344_Official
Andrew	Clearwater	N/A	Future of Privacy Forum	1400 Eye St NW Ste 450 Washington, DC 20005-6503	Paper Service	No	OFF_SL_12-1344_Official
Roger	Colton	roger@fsconline.com		34 warwick road belmont, ma 02478	Electronic Service	No	OFF_SL_12-1344_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_12-1344_Official
Riley	Conlin	riley.conlin@stoel.com	Stoel Rives LLP	33 S. 6th Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_12-1344_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Stacy	Dahl	sdahl@minnkota.com	Minnkota Power Cooperative, Inc.	5301 32nd Ave S Grand Forks, ND 58201	Electronic Service	No	OFF_SL_12-1344_Official
Steve	Downer	sdowner@mmua.org	MMUA	3025 Harbor Ln N Ste 400 Plymouth, MN 554475142	Electronic Service	No	OFF_SL_12-1344_Official
Jennifer	Edwards	jedwards@mncee.org	Center for Energy and Environment	212 3rd Ave. N. Ste 560 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_12-1344_Official
Trent	Fellers	Trent.Fellers@windstream.com	Windstream	1440 M St Lincoln, NE 68508	Electronic Service	No	OFF_SL_12-1344_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_12-1344_Official
Bill	Gullickson	wdgvc76@yahoo.com		1819 Colfax Avenue S Minneapolis, MN 55403	Electronic Service	No	OFF_SL_12-1344_Official
Ryan	Hentges	ryanh@mvec.net	Minnesota Valley Electric Cooperative	125 Minnesota Valley Electric Dr Jordan, MN 55352	Electronic Service	No	OFF_SL_12-1344_Official
Caroline	Horton	chorton@aeonmn.org	Aeon	901 N 3rd St Ste 150 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_12-1344_Official
Craig	Johnson	cjohnson@lmc.org	League of Minnesota Cities	145 University Ave. W. Saint Paul, MN 55103-2044	Electronic Service	No	OFF_SL_12-1344_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Alexandra	Klass	aklass@umn.edu		University of Minnesota Law School 229-19th Avenue South Minneapolis, MN 55105	Electronic Service	No	OFF_SL_12-1344_Official
Nicolle	Kupser	nkupser@greatermngas.com	Greater Minnesota Gas, Inc. & Greater MN Transmission, LLC	1900 Cardinal Ln PO Box 798 Faribault, MN 55021	Electronic Service	No	OFF_SL_12-1344_Official
Douglas	Larson	dlarson@dakotaelectric.com	Dakota Electric Association	4300 220th St W Farmington, MN 55024	Electronic Service	No	OFF_SL_12-1344_Official
Erica	Larson	erica.larson@centerpointenergy.com	CenterPoint Energy	505 Nicollet Avenue P.O. Box 59038 Minneapolis, Minnesota 55459-0038	Electronic Service	No	OFF_SL_12-1344_Official
Kevin	Lewis	kl@bomampls.org	Greater Minneapolis BOMA	Suite 610 121 South 8th Street Minneapolis, MN 55402	Electronic Service	No	OFF_SL_12-1344_Official
Todd	Liljenquist	todd.liljenquist@mmha.com	Minnesota Multi Housing Association (MHA)	1600 West 82nd Street, Suite 110 Minneapolis, MN 55431	Electronic Service	No	OFF_SL_12-1344_Official
Kevin	Marquardt	Kevin.Marquardt@CenterPointEnergy.com	CenterPoint Energy	505 Nicollet Mall PO Box 59038 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_12-1344_Official
Sarah	Marquardt	smarquardt@mcknight.org	The McKnight Foundation	710 S 2nd St Minneapolis, MN 55401	Electronic Service	No	OFF_SL_12-1344_Official
J.B.	Matthews	N/A	Cushman & Wakefield/NorthMarq	3500 American Blvd W - #200 Minneapolis, MN 55431	Paper Service	No	OFF_SL_12-1344_Official

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Craig	McDonnell	Craig.McDonnell@state.mn.us	MN Pollution Control Agency	520 Lafayette Road St. Paul, MN 55101	Electronic Service	No	OFF_SL_12-1344_Official
David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022093	Electronic Service	No	OFF_SL_12-1344_Official
Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP	33 South Sixth St Ste 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_12-1344_Official
Eric	Muschler	emuschler@mcknight.org	The McKnight Foundation	710 South 2nd Street Minneapolis, MN 55401	Electronic Service	No	OFF_SL_12-1344_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_12-1344_Official
Greg	Palmer	gpalmer@greatermngas.com	Greater Minnesota Gas, Inc. & Greater MN Transmission, LLC	1900 Cardinal Ln PO Box 798 Faribault, MN 55021	Electronic Service	No	OFF_SL_12-1344_Official
Joyce	Peppin	joyce@mrea.org	Minnesota Rural Electric Association	11640 73rd Ave N Maple Grove, MN 55369	Electronic Service	No	OFF_SL_12-1344_Official
Tammy	Pust	Tammy.Pust@state.mn.us	Office of Administrative Hearings	PO Box 64620 St. Paul, MN 55164-0620	Electronic Service	No	OFF_SL_12-1344_Official
Phyllis	Reha	phyllisreha@gmail.com		3656 Woodland Trail Eagan, MN 55123	Electronic Service	No	OFF_SL_12-1344_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_12-1344_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Richard	Savelkoul	rsavelkoul@martinsquires.com	Martin & Squires, P.A.	332 Minnesota Street Ste W2750 St. Paul, MN 55101	Electronic Service	No	OFF_SL_12-1344_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_12-1344_Official
Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates	7400 Lyndale Ave S Ste 190 Richfield, MN 55423	Electronic Service	No	OFF_SL_12-1344_Official
Brendon	Slotterback	bslotterback@mcknight.org	The McKnight Foundation	710 S 2nd St Minneapolis, MN 55401	Electronic Service	No	OFF_SL_12-1344_Official
Peggy	Sorum	peggy.sorum@centerpointenergy.com	CenterPoint Energy	505 Nicollet Mall Minneapolis, MN 55402	Electronic Service	No	OFF_SL_12-1344_Official
Cary	Stephenson	cStephenson@otpc.com	Otter Tail Power Company	215 South Cascade Street Fergus Falls, MN 56537	Electronic Service	No	OFF_SL_12-1344_Official
Lynnette	Sweet	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_12-1344_Official
Jason	Topp	jason.topp@lumen.com	CenturyLink	200 S 5th St Ste 2200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_12-1344_Official
Andrew	Twite	twite@fresh-energy.org	Fresh Energy	408 St. Peter Street, Ste. 220 St. Paul, MN 55102	Electronic Service	No	OFF_SL_12-1344_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Patricia	Whitney	patricia@pwhitneylaw.com	St. Paul Assn of Responsible Landlords	627 Snelling Avenue South St. Paul, MN 55116	Electronic Service	No	OFF_SL_12-1344_Official
Elizabeth	Wilson	ewilson@umn.edu	University of Minnesota	301 19th Ave South Minneapolis, Minnesota 55455	Electronic Service	No	OFF_SL_12-1344_Official
Josh	Winters	josh@mpirg.org	Minnesota Public Interest Research Group	2722 University Ave SE Minneapolis, MN 55414	Electronic Service	No	OFF_SL_12-1344_Official
Robyn	Woeste	robynwoeste@alliantenergy.com	Interstate Power and Light Company	200 First St SE Cedar Rapids, IA 52401	Electronic Service	No	OFF_SL_12-1344_Official