

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 the Petition of Northern States
Power Company d/b/a Xcel Energy for the
Approval of a Renewable*Connect Program
Modification

SERVICE DATE: May 18, 2023

DOCKET NO. E-002/M-21-222
E-002/M-19-33

In the Matter of the Petition of Northern States
Power Company d/b/a Xcel Energy for Approval
of a Renewable*Connect Program

The above-entitled matter was considered by the Commission on May 11, 2023, and the following disposition made:

- 1. Approved Xcel Energy's updated Renewable Connect compliance items and corresponding tariff modifications as filed in Xcel's December 22, 2022, update and as corrected by the errata dated December 23, 2022.**
- 2. Approved the following additional program modifications as outlined in Xcel's December 22, 2022, update and as corrected by the December 23, 2022, errata:**
 - a. Elimination of the Renewable*Connect Bridge.**
 - b. Addition of C-Bed wind Resource (Uilk) to the Month-to-Month Offering.**
 - c. Modification of the customer enrollment process.**
 - d. Shift in the transition timeline.**
 - e. Change in the program name from Month-to-Month to Renewable*Connect Flex.**
- 3. Required Xcel to address the following in the Company's 2023 R*C annual report to be filed on or before April 1, 2024:**
 - a. How it will become less dependent on system energy and renewable energy credits (RECs) for the R*C MTM offering going forward.**
 - b. The size of any waitlist for participation in the R*C program and Xcel's plans to serve those customers.**
 - c. An assessment and discussion of the Company's actual experience of the high off-peak program customer resource usage compared to resource availability.**

The Commission agrees with and adopts the recommendations of the Department of Commerce, which are attached and hereby incorporated into the Order.¹ This Order shall become effective immediately.

BY ORDER OF THE COMMISSION

William C. Butts for

Will Seuffert
Executive Secretary



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¹ In addition to the Department's recommendation as shown in ordering paragraph 1 above, the Commission will take the actions set forth in ordering paragraphs 2 and 3. The Commission also recognizes and appreciates the input of the public in identifying issues for Commission consideration, particularly the recommendations of Andrew Butts and Aaron Hanson. The Commission will continue to examine these issues as these proceedings continue.

March 20, 2023

Will Seuffert
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
Saint Paul, Minnesota 55101-2147

RE: **Comments of the Minnesota Department of Commerce, Division of Energy Resources**
Docket No. E002/M-21-222

Dear Mr. Seuffert:

Attached are the comments of the Minnesota Department of Commerce, Division of Energy Resources (Department) in the following matter:

Northern State Power Company d/b/a Xcel Energy for Approval of a Renewable*Connect Program Modification

The Department recommends that the Minnesota Public Utilities Commission **approve** Xcel Energy's updated tariff modifications and updated program. The Department is available to answer any questions that the Commission may have.

Sincerely,

/s/ WILL NISSEN
Public Utilities Rates Analyst

WN/ar
Attachment



Before the Minnesota Public Utilities Commission

Comments of the Minnesota Department of Commerce Division of Energy Resources

Docket No. E002/M-21-222

I. BACKGROUND

On February 27, 2017, the Minnesota Public Utilities Commission (Commission) issued its *Order Approving Pilot Programs and Requiring Filings* in the matter of Northern States Power Company d/b/a Xcel Energy's (Xcel or the Company) Request for Approval of its Renewable*Connect (R*C) Pilot Program in Docket No. E002/M-15-985.

On August 12, 2019, the Commission issued its *Order Approving Petition with Modifications* in the matter of Northern States Power Company, d/b/a Xcel Energy, Petition to Expand its Renewable*Connect Program in Docket No. E002/M-19-33. In that Order the Commission approved the Company's petition to transition the R*C pilot program into a full program and issued additional reporting requirements for the Company's annual program compliance filings.

On April 1, 2021, Xcel filed the R*C Program pricing and tariff modifications required in the compliance portion of the August 12, 2019 Order in Docket Nos. E002/M-21-222 and E002/M-19-33, as well as a petition for approval of modifications to the R*C Program launch plan and tariffs.

On December 9, 2022, Xcel filed a petition for approval of two replacement Solar Energy Purchase Agreements (Replacement PPAs) with Louise Solar Project and Fillmore County Solar Project to replace the Elk Creek Solar Project, which was approved by the Minnesota Public Utilities Commission (Commission) in a May 18, 2021, Order in Docket No. E002/M-19-568. The Company stated in that docket that the Replacement PPAs were necessary as the Elk Creek Solar project had been delayed and faced interconnection issues that made the project untenable.

On December 22, 2022, Xcel submitted a Renewable*Connect Program Modification in Docket No. E002/M-21-222 providing an update on the Company's efforts to resolve the program's resource challenges identified in previous filings, and providing final program pricing, corresponding proposed tariff sheets, and program modification requests (Filing). On December 23, 2022, Xcel submitted an Errata filing providing corrected calculations in the Filing's attachments (Errata Filing).

On February 17, 2023, the Commission issued a Notice of Supplemental Comment Period (Notice) in the instant docket with the following topics open for comment:

- A. Are Xcel Energy's updated tariff modifications in compliance with the Commission's August 12, 2019 Order Approving Petition with Modifications in Docket No. E002/M-19-33?
- B. Is Xcel Energy's request to transfer the Community-Based Economic Development (C-BED) wind resource, Uilk Wind Farm LLC, from a Fuel Clause resource to the Month-to-Month Renewable*Connect program resource reasonable and in the public interest?

- C. Are Xcel Energy's updated Long Term and Month-to-Month (also called Renewable*Connect Flex) pricing, tariffs, and program modifications reasonable and in the public interest?
- D. Is the elimination of the "R*C Bridge" feature from the tariff and the new program launch timeline reasonable?
- E. Is Xcel Energy's request for approval of its Petition of a Renewable*Connect Program and timeline modification reasonable and in the public interest?
- F. Are there other issues or concerns related to this matter?

On March 16, 2023, the Commission met on Docket No. E002/M-19-568 and verbally approved the Replacement PPAs to replace the Elk Creek Solar Project.

II. DEPARTMENT ANALYSIS

With the Commission's verbal approval of the Replacement PPAs referenced above, the Department concludes that the Renewable*Connect program should move forward with the resources proposed in Xcel's program modification filed on April 1, 2021 in Docket Nos. E002/M-19-33 and E002/M-21-222 and the Replacement PPAs. The Department addresses the Commission's specific questions from the Notice in the following sections.

A. ARE XCEL ENERGY'S UPDATED TARIFF MODIFICATIONS IN COMPLIANCE WITH THE COMMISSION'S AUGUST 12, 2019 ORDER APPROVING PETITION WITH MODIFICATIONS IN DOCKET NO. E002/M-19-33?

In comments filed June 4, 2021 in the instant docket, the Department reviewed the tariff modifications proposed in Xcel's April 1, 2021 program modification filing and found that the updated tariffs were in compliance with the Commission's August 12, 2019 Order.¹ The modifications in Xcel's Filing updated the tariffs to reflect new program timelines and other changes, as well as changed the name of the Month-to-Month program to Renewable*Connect Flex to align with similar offerings in the Company's Colorado service territory. The Department does not have any concerns with the new modifications and concludes that the tariff modifications still comply with the Commission's August 12, 2019 Order.

*B. IS XCEL ENERGY'S REQUEST TO TRANSFER THE COMMUNITY-BASED ECONOMIC DEVELOPMENT (C-BED) WIND RESOURCE, UILK WIND FARM LLC, FROM A FUEL CLASE RESOURCE TO THE MONTH-TO-MONTH RENEWABLE*CONNECT PROGRAM RESOURCE REASONABLE AND IN THE PUBLIC INTEREST?*

The Department reviewed the Company's proposal to transfer Uilk Wind Farm from a fuel clause resource to the Month-to-Month Renewable*Connect program and found that, despite resource cost concerns, the transfer is reasonable, in the public interest, and would benefit non-participating customers.²

¹ Comments filed by the Department on June 4, 2021 in Docket Nos. E002/M-21-222 and E002/M-19-33. Pages 7-10.

² Comments filed by the Department on June 4, 2021 in Docket Nos. E002/M-21-222 and E002/M-19-33. Pages 10-13.

C. ARE XCEL ENERGY'S UPDATED LONG TERM AND MONTH-TO-MONTH (ALSO CALLED RENEWABLE*CONNECT FLEX) PRICING, TARIFFS, AND PROGRAM MODIFICATIONS REASONABLE AND IN THE PUBLIC INTEREST?

The Department reviewed the updated long-term and Renewable*Connect Flex pricing, tariffs, and program modifications in the Company's Filing. The Department notes that the total pricing and neutrality charges indicated in Attachment B of the Errata Filing for all the Renewable*Connect program offerings (5-year high off-peak, 10-year high off-peak, 5-year standard, 10-year standard, and Renewable*Connect Flex) increased significantly from the total pricing and neutrality charges filed in Attachment B of the Company's April 1, 2021 petition. The capacity credit for all the program offerings also increased. A comparison of these differences across the different program offerings are summarized in Table 1 below and provided in more detail in Attachment A of the instant comments.

Table 1. Pricing, Neutrality Charge, and Capacity Credit Comparison³

	Percent increase between April 1, 2021 Petition and December 23, 2022 Errata Filing
Total Pricing⁴:	
5-year High Off-Peak	23.1%
10-Year High Off-Peak	23.2%
5-Year Standard	25.1%
10-Year Standard	25.2%
Renewable*Connect Flex	27.5%
Resource Cost:	
R*C High Off-Peak	4.2%
R*C Standard	7.3%
Renewable*Connect Flex	31.5%
Neutrality Charge:	
R*C High Off-Peak	70.7%
R*C Standard	70.0%
Renewable*Connect Flex	25.9%
Capacity Credit:	
R*C High Off-Peak	4.8%
R*C Standard	5.4%
Renewable*Connect Flex	48.8%

³ The percent differences reflect the average difference over the life of the program. For the long-term offerings the average encompasses the program years 2023-2031. For the Renewable*Connect Flex offering the average encompasses a comparison between program years 2023 and 2024 compared to the Month-to-Month program year 2022 indicated in the Company's April 1, 2021 petition.

⁴ Total Pricing = Resource Cost + Neutrality Charge - Capacity Credit + Administrative Cost. The Department note that administrative costs did not change between the two pricing filings.

Xcel stated in its Filing that resource costs have increased due to higher prices for solar projects, system energy, and Renewable Energy Credits (RECs); neutrality charges have increased due to higher costs for line losses, congestion, and balancing, and increased fuel costs and fuel clause requirements for long term offerings; and, capacity credits have changed due to a combination of decreased resource production and updated project capacity factors.⁵

The Department notes that resource costs are driving some of the total program pricing increases between the April 1, 2021 petition and Errata Filing. However, most of the pricing increases are driven by the significant increases in the neutrality charge and increases in the neutrality charge are driven by the addition of the “market adjustment” in the Errata Filing.⁶ Xcel stated that the market adjustment was added to “reflect increased fuel costs and [to] price this product as a premium to the current fuel clause which will be returned to system fuel clause customers as part of the neutrality charge.”⁷

While the increases in program costs are concerning, the Department concludes that the increases are reasonable given recent changes in the energy market. The Department will monitor changes in program prices through the Renewable*Connect annual reports. The Department also notes that participation in Renewable*Connect is voluntary and that program costs and revenues are contained to participating Renewable*Connect customers so non-participating are not affected by changes in program costs.

*D. IS THE ELIMINATION OF THE “R*C BRIDGE” FEATURE FROM THE TARIFF AND THE NEW PROGRAM LAUNCH TIMELINE REASONABLE?*

The Department concludes that elimination of the R*C Bridge is reasonable based on analysis and recommendations in the Department’s comments filed June 4, 2021 in the instant docket.⁸

*E. IS XCEL ENERGY’S REQUEST FOR APPROVAL OF ITS PETITION OF A RENEWABLE*CONNECT PROGRAM AND TIMELINE MODIFICATION REASONABLE AND IN THE PUBLIC INTEREST?*

The Department has reviewed Xcel’s updated timeline modification and finds that it is reasonable and in the public interest given the delays to the initially proposed program launch schedule. Overall, the Department finds that the Renewable*Connect program as updated and modified in Xcel’s April 1, 2021 petition, the Filing, and the Errata Filing are reasonable and in the public interest.

F. ARE THERE OTHER ISSUES OR CONCERNS RELATED TO THE THIS MATTER?

The Department identified one error on page 17 of Attachment B in Xcel’s Errata Filing, where total program revenues for the Renewable*Connect standard program offering (\$43,426,983) greatly exceeded program expenses (\$16,504,581), even though the program is designed to be net revenue

⁵ Filing. Pages 2-3.

⁶ See Xcel’s Errata Filing, Attachment B.

⁷ Xcel Filing. Page 2.

⁸ Department Comments filed June 4, 2021 in Docket No. E002/M-21-222. Page 6.

neutral. Through email correspondence with the Department, the Company acknowledged the error and provided a corrected calculation which is included as Attachment B to the instant comments. The Department appreciates the Company's cooperation and determines that this issue is resolved.

III. CONCLUSIONS AND RECOMMENDATIONS

The Department has reviewed Xcel's April 1, 2021 petition, the Filing, and Errata Filing and recommends that the Commission approve the Company's updated Renewable*Connect program and tariff modifications.

ATTACHMENT A

Comparison of April 1, 2021 Petition and December 23, 2022 Errata Filing
(in cents per KWh unless otherwise noted)

		2022	2023	2024	2025	2026	2027	2028	2029	2030	2031	2032	Average
Total Pricing													
5-Year R*C High Off-Peak 2021			2.99	3.034	3.08	3.126	3.173	3.221	3.271	3.322	3.372		
5-Year R*C High Off-Peak 2022			3.719	3.763	3.81	3.857	3.904	3.954	4.002	4.055	4.106	4.161	
	Difference:		24.4%	24.0%	23.7%	23.4%	23.0%	22.8%	22.3%	22.1%	21.8%		23.1%
10-Year R*C High Off-Peak 2021			2.975	3.019	3.065	3.111	3.158	3.206	3.256	3.307	3.357		
10-Year R*C High Off-Peak 2022			3.704	3.748	3.795	3.842	3.889	3.939	3.987	4.04	4.091	4.146	
	Difference:		24.5%	24.1%	23.8%	23.5%	23.1%	22.9%	22.5%	22.2%	21.9%		23.2%
5-Year R*C Standard 2021			3.148	3.185	3.224	3.263	3.304	3.345	3.387	3.432	3.474		
5-Year R*C Standard 2022			3.974	4.013	4.051	4.092	4.132	4.174	4.217	4.261	4.304	4.352	
	Difference:		26.2%	26.0%	25.7%	25.4%	25.1%	24.8%	24.5%	24.2%	23.9%		25.1%
10-Year R*C Standard 2021			3.133	3.17	3.209	3.248	3.289	3.33	3.372	3.417	3.459		
10-Year R*C Standard 2022			3.959	3.998	4.036	4.077	4.117	4.159	4.202	4.246	4.289	4.337	
	Difference:		26.4%	26.1%	25.8%	25.5%	25.2%	24.9%	24.6%	24.3%	24.0%		25.2%
R*C Month-to-Month 2021		3.244											
R*C Flex 2022			4.117	4.158									
	Difference (with MTM 2022):		26.9%	28.2%									27.5%
Resource Cost													
R*C High Off-Peak 2021			2.328	2.364	2.401	2.439	2.477	2.516	2.556	2.597	2.638		
R*C High Off-Peak 2022			2.431	2.467	2.504	2.542	2.581	2.62	2.66	2.701	2.743	2.785	
	Difference:		4.4%	4.4%	4.3%	4.2%	4.2%	4.1%	4.1%	4.0%	4.0%		4.2%
R*C Standard 2021			2.546	2.578	2.611	2.644	2.679	2.713	2.749	2.785	2.822		
R*C Standard 2022			2.74	2.773	2.806	2.84	2.875	2.91	2.946	2.983	3.02	3.059	
	Difference:		7.6%	7.6%	7.5%	7.4%	7.3%	7.3%	7.2%	7.1%	7.0%		7.3%
R*C Month-to-Month 2021		2.849											
R*C Flex 2022			3.725	3.767									
	Difference (with MTM 2022):		30.7%	32.2%									31.5%
Capacity Credit													
R*C High Off-Peak 2021			0.301	0.308	0.315	0.323	0.33	0.338	0.345	0.353	0.361		
R*C High Off-Peak 2022			0.315	0.323	0.33	0.338	0.346	0.354	0.362	0.37	0.378	0.385	
	Difference:		4.7%	4.9%	4.8%	4.6%	4.8%	4.7%	4.9%	4.8%	4.7%		4.8%
R*C Standard 2021			0.389	0.398	0.407	0.417	0.427	0.437	0.447	0.457	0.468		
R*C Standard 2022			0.41	0.419	0.43	0.44	0.45	0.461	0.471	0.482	0.493	0.502	
	Difference:		5.4%	5.3%	5.7%	5.5%	5.4%	5.5%	5.4%	5.5%	5.3%		5.4%
R*C Month-to-Month 2021		0.292											
R*C Flex 2022			0.43	0.439									
	Difference (with MTM 2021):		47.3%	50.3%									48.8%
Neutrality Charge													
R*C High Off-Peak 2021			0.848	0.863	0.879	0.895	0.911	0.928	0.945	0.963	0.98		
R*C High Off-Peak 2022			1.488	1.504	1.521	1.538	1.554	1.573	1.589	1.609	1.626	1.646	
	Difference:		75.5%	74.3%	73.0%	71.8%	70.6%	69.5%	68.1%	67.1%	65.9%		70.7%
R*C Standard 2021			0.876	0.89	0.905	0.921	0.937	0.954	0.97	0.989	1.005		
R*C Standard 2022			1.529	1.544	1.56	1.577	1.592	1.61	1.627	1.645	1.662	1.68	
	Difference:		74.5%	73.5%	72.4%	71.2%	69.9%	68.8%	67.7%	66.3%	65.4%		70.0%
R*C Month-to-Month 2021		0.537											
R*C Flex 2022			0.672	0.68									
	Difference (with MTM 2021):		25.1%	26.6%									25.9%

Renewable*Connect Sales, Revenue and Expense Tracker

In 000s of kWh , except where labeled differently

Renewable*Connect Sales and Revenue														
		January	February	March	April	May	June	July	August	September	October	November	December	Total
Sales														
5-Year High Off-Peak		18,888	17,321	19,943	20,873	20,659	18,186	15,796	14,808	17,396	19,500	19,017	18,468	220,855
10-Year High Off-Peak		18,888	17,321	19,943	20,873	20,659	18,186	15,796	14,808	17,396	19,500	19,017	18,468	220,855
Total High Off-Peak		37,776	34,642	39,886	41,746	41,318	36,372	31,592	29,616	34,792	39,000	38,034	36,936	441,710
5-Year Standard		9,912	9,266	10,980	11,658	11,734	10,576	9,576	8,811	9,853	10,601	10,028	9,636	122,632
10-Year Standard		9,912	9,266	10,980	11,658	11,734	10,576	9,576	8,811	9,853	10,601	10,028	9,636	122,632
Standard		21,397	18,120	21,099	17,722	19,115	21,222	24,465	23,806	19,830	18,985	18,799	20,703	245,264
Total		59,173	52,762	60,985	59,468	60,433	57,594	56,057	53,422	54,622	57,985	56,833	57,639	686,974
Price (Cents per kWh)														
5-Year High Off-Peak	3.719	3.719	3.719	3.719	3.719	3.719	3.719	3.719	3.719	3.719	3.719	3.719	3.719	
10-Year High Off-Peak	3.704	3.704	3.704	3.704	3.704	3.704	3.704	3.704	3.704	3.704	3.704	3.704	3.704	
5-Year Standard	3.974	3.974	3.974	3.974	3.974	3.974	3.974	3.974	3.974	3.974	3.974	3.974	3.974	
10-Year Standard	3.959	3.959	3.959	3.959	3.959	3.959	3.959	3.959	3.959	3.959	3.959	3.959	3.959	
Program Participant Payments														
5-Year High Off-Peak	Billing Month	\$702,445	\$644,168	\$741,680	\$776,267	\$768,308	\$676,337	\$587,453	\$550,710	\$646,957	\$725,205	\$707,242	\$686,825	\$8,213,597
10-Year High Off-Peak	Billing Month	\$699,612	\$641,570	\$738,689	\$773,136	\$765,209	\$673,609	\$585,084	\$548,488	\$644,348	\$722,280	\$704,390	\$684,055	\$8,180,469
Sub-Total High Off-Peak	Billing Month	\$1,402,056	\$1,285,738	\$1,480,369	\$1,549,403	\$1,533,518	\$1,349,947	\$1,172,537	\$1,099,198	\$1,291,305	\$1,447,485	\$1,411,632	\$1,370,880	\$16,394,067
5-Year Standard	Billing Month	\$393,902	\$368,226	\$436,352	\$463,302	\$466,318	\$420,303	\$380,532	\$350,160	\$391,542	\$421,292	\$398,532	\$382,927	\$4,873,387
10-Year Standard	Billing Month	\$392,415	\$366,836	\$434,705	\$461,553	\$464,558	\$418,716	\$379,096	\$348,838	\$390,064	\$419,701	\$397,027	\$381,481	\$4,854,993
Sub-total Standard	Billing Month	\$786,317	\$735,062	\$871,057	\$924,855	\$930,877	\$839,019	\$759,629	\$698,999	\$781,606	\$840,993	\$795,559	\$764,408	\$9,728,380
Capacity Credits														
	Cents/kWh													
High Off-Peak	0.315	\$118,994	\$109,122	\$125,641	\$131,500	\$130,152	\$114,572	\$99,515	\$93,290	\$109,595	\$122,850	\$119,807	\$116,348	\$1,391,387
Standard	0.410	\$87,728	\$74,291	\$86,505	\$72,660	\$78,370	\$87,012	\$100,308	\$97,605	\$81,303	\$77,839	\$77,075	\$84,884	\$1,005,581
Total		\$206,723	\$183,413	\$212,146	\$204,160	\$208,521	\$201,584	\$199,823	\$190,896	\$190,898	\$200,689	\$196,882	\$201,232	\$2,396,967
Program Revenue														
High Off-Peak		\$1,521,051	\$1,394,860	\$1,606,010	\$1,680,903	\$1,663,669	\$1,464,519	\$1,272,052	\$1,192,488	\$1,400,900	\$1,570,335	\$1,531,439	\$1,487,228	\$17,785,453
Standard		\$874,045	\$809,353	\$957,563	\$997,515	\$1,009,246	\$926,031	\$859,936	\$796,604	\$862,909	\$918,832	\$872,634	\$849,292	\$10,733,961
Total		\$2,395,096	\$2,204,213	\$2,563,572	\$2,678,418	\$2,672,916	\$2,390,549	\$2,131,988	\$1,989,092	\$2,263,809	\$2,489,167	\$2,404,073	\$2,336,520	\$28,519,414
Expenses														
		January	February	March	April	May	June	July	August	September	October	November	December	Total
Resource Cost														
High Off-Peak	[PROTECTED DATA BEGINS]													
Standard														
Total Resource Cost		\$1,504,618	\$1,338,628	\$1,547,738	\$1,500,428	\$1,528,179	\$1,465,698	\$1,438,351	\$1,372,254	\$1,389,136	\$1,468,283	\$1,439,695	\$1,465,187	17,458,192
Neutrality Charge														
High Off-Peak	[PROTECTED DATA BEGINS]													
Standard	1.488													
	1.529													
Total Neutrality Cost		\$889,270	\$792,524	\$916,106	\$892,150	\$907,073	\$865,706	\$844,163	\$804,682	\$820,906	\$870,603	\$853,380	\$866,162	10,322,725
Marketing and Administrative														
High Off-Peak	[PROTECTED DATA BEGINS]													
Standard														
Total Marketing and Administrative Cost		\$61,920	\$57,162	\$66,485	\$69,942	\$69,645	\$61,839	\$54,549	\$50,781	\$58,584	\$64,718	\$62,448	\$60,423	738,497
High Off-Peak Standard														
High Off-Peak	[PROTECTED DATA BEGINS]													
Standard														
Total Cost		\$2,455,808	\$2,188,313	\$2,530,328	\$2,462,520	\$2,504,897	\$2,393,244	\$2,337,063	\$2,227,717	\$2,268,626	\$2,403,603	\$2,355,523	\$2,391,772	\$28,519,414

CERTIFICATE OF SERVICE

I, Robin Benson, 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

Docket Numbers: **E-002/M-21-222; E-002/M-19-33**

Dated this **18th** day of **May, 2023**

/s/ Robin Benson

[illegible]

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Catherine	Fair	catherine@energycents.org	Energy CENTS Coalition	823 E 7th St St Paul, MN 55106	Electronic Service	No	OFF_SL_19-33_Official Service List 19-33
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S Mike	Holly	4358@brainerd.net	Sorgo Fuels and Chemicals, Inc.	34332 Sunrise Blvd Crosslake, MN 56442	Electronic Service	No	OFF_SL_19-33_Official Service List 19-33
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Frank	Kohlasch	frank.kohlasch@state.mn.us	MN Pollution Control Agency	520 Lafayette Rd N. St. Paul, MN 55155	Electronic Service	No	OFF_SL_19-33_Official Service List 19-33

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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_19-33_Official Service List 19-33
Stacy	Miller	stacy.miller@minneapolismn.gov	City of Minneapolis	350 S. 5th Street Room M 301 Minneapolis, MN 55415	Electronic Service	No	OFF_SL_19-33_Official Service List 19-33
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Carol A.	Overland	overland@legalelectric.org	Legalelectric - Overland Law Office	1110 West Avenue Red Wing, MN 55066	Electronic Service	No	OFF_SL_19-33_Official Service List 19-33
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_19-33_Official Service List 19-33

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