



414 Nicollet Mall  
Minneapolis, MN 55401

April 19, 2023

—Via Electronic Filing—

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

RE: RESILIENT MINNEAPOLIS PROJECT  
PETITION FOR APPROVAL FOR UPDATED COSTS  
DOCKET NO. E002/M-21-694

Dear Mr. Seuffert:

Northern States Power Company, doing business as Xcel Energy, submits to the Minnesota Public Utilities Commission this filing regarding the Resilient Minneapolis Project (RMP), in compliance with Order Point 9 of the Commission's July 26, 2022 Order in the above-mentioned docket. With this Petition, we request Commission action on our request for an increased cost cap for the RMP.

Order Point 9 of the Order states:

*Xcel shall file a letter in this docket to notify the Commission and stakeholders if the Company encounters any significant procurement challenges related to RMP, including delays, low bid numbers, or unexpected costs.*

We have received the results of our recent request for proposals related to the project and re-evaluated our budget, which has increased to \$17.7 million due to industry trends and economy-wide inflationary pressures, as we explain in the enclosed Petition. Given this increase, we propose to move the project forward at all three sites, but we have paused implementation of RMP at one of the three sites while we seek input from the Commission on the cost increase.

We have electronically filed this document with the Commission, and copies have

been served on the parties on the attached service list. Please contact Taige Tople at [taige.d.tople@xcelenergy.com](mailto:taige.d.tople@xcelenergy.com) or me at [amber.r.hedlund@xcelenergy.com](mailto:amber.r.hedlund@xcelenergy.com) if you have any questions regarding this filing.

Sincerely,

/s/

AMBER HEDLUND  
MANAGER, REGULATORY PROJECT MANAGEMENT

Enclosure  
cc: Service List

## **REQUIRED INFORMATION**

### **I. SUMMARY OF FILING**

A one-paragraph summary is attached to this filing pursuant to Minn. R. 7829.1300, subp. 1.

### **II. SERVICE ON OTHER PARTIES**

Pursuant to Minn. Stat. § 216.17, subd. 3, we have electronically filed this document with the Commission. Pursuant to Minn. R. 7829.1300, subp. 2, the Company has served a copy of this filing on the Department of Commerce and the Office of the Attorney General. A summary of the filing has been served on all parties on the enclosed service list.

### **III. GENERAL FILING INFORMATION**

Pursuant to Minn. R. 7829.1300, subp. 3, the Company provides the following information.

#### **A. Name, Address, and Telephone Number of Utility**

Northern States Power Company doing business as:  
Xcel Energy  
414 Nicollet Mall  
Minneapolis, MN 55401  
(612) 330-5500

#### **B. Name, Address, and Telephone Number of Utility Attorney**

Shubha Harris  
Deputy General Counsel  
Xcel Energy  
414 Nicollet Mall, 401 – 8<sup>th</sup> Floor  
Minneapolis, MN 55401  
612-215-4517

#### **C. Date of Filing**

The date of this filing is April 19, 2023.

## **REQUIRED INFORMATION**

### **D. Statute Controlling Schedule for Processing the Filing**

Commission Rules define this filing as a “miscellaneous filing” under Minn. R. 7829.0100, subp. 11 since no determination of Xcel Energy’s overall revenue requirement is necessary. Minn. R. 7829.1400, subp. 1 and 4 permit comments in response to a miscellaneous filing to be filed within 30 days and reply comments to be filed no later than 10 days thereafter.

### **E. Utility Employee Responsible for Filing**

Amber Hedlund  
Manager, Regulatory Project Management  
Xcel Energy  
414 Nicollet Mall, 401 – 7<sup>th</sup> Floor  
Minneapolis, MN 55401  
612-337-2268

## **IV. MISCELLANEOUS INFORMATION**

Pursuant to Minn. R. 7829.0700, the Company requests that the following persons be placed on the Commission’s official service list for this proceeding:

Shubha Harris  
Deputy General Counsel  
Xcel Energy  
414 Nicollet Mall, 401 – 8<sup>th</sup> Floor  
Minneapolis, MN 55401  
[shubha.m.harris@xcelenergy.com](mailto:shubha.m.harris@xcelenergy.com)

Christine Schwartz  
Regulatory Administrator  
Xcel Energy  
414 Nicollet Mall, 401 – 7<sup>th</sup> Floor  
Minneapolis, MN 55401  
[regulatory.records@xcelenergy.com](mailto:regulatory.records@xcelenergy.com)

Any information requests in this proceeding should be submitted to Ms. Schwartz at the Regulatory Records email address above.

STATE OF MINNESOTA  
BEFORE THE  
MINNESOTA PUBLIC UTILITIES COMMISSION

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

IN THE MATTER OF XCEL ENERGY'S  
2021 INTEGRATED DISTRIBUTION  
SYSTEM PLAN

DOCKET NO. E002/M-21-694

**PETITION FOR APPROVAL OF  
UPDATED COSTS FOR THE RESILIENT  
MINNEAPOLIS PROJECT**

**INTRODUCTION**

Northern States Power Company, doing business as Xcel Energy, submits this Petition to the Minnesota Public Utilities Commission for approval of updated costs for the Resilient Minneapolis Project (RMP).

As the Commission is aware, the RMP seeks to improve communities' resilience to crises by installing solar/battery microgrids at three community center locations in Minneapolis: the North Minneapolis Community Resiliency Hub, the Sabathani Community Center, and the Minneapolis American Indian Center (MAIC).

The Commission's July 26, 2022 Order (Order) certifying the RMP set a cost cap of \$9 million based on our preliminary capital budget estimate presented with our November 1, 2021 certification request. Order Point 7 of the Order states in part:

*The Commission certifies the Resilient Minneapolis Project and limits cost recovery to a cost cap of \$9 million unless Xcel can show by clear and convincing evidence that the costs were reasonable, prudent, and beyond the Company's control.*

The Order also requires the Company to notify the Commission and stakeholders of any unexpected costs because, as we indicated at the hearing, we did not at that time

believe the initial estimates from 2021 remained accurate given inflationary and supply chain pressures.<sup>1</sup>

In our RMP Annual Report filed December 1, 2022, we indicated:

As the Company explained in the June 1, 2022 hearing on our IDP, supply chain issues and inflationary pressures have had a significant impact on the costs of several microgrid components. While we will not have updated pricing until we receive RFP responses in early 2023, we expect the costs of those components – including at least [battery energy storage systems], islanding switches, and transformers – to increase relative to our previous estimate, which was based on [the National Renewable Energy Laboratory’s (NREL’s)] Annual Technology Baseline costs as of 2020. As the Commission is aware, unfortunately these cost increases are common across many projects and the industry at large, and these increases are beyond the Company’s control. We expect these cost increases will increase the budget for the three RMP microgrids beyond the initial \$9 million capital cost estimate.

We have recently received the results of our Request for Proposals (RFP). Those results confirm that the capital costs for the project at all three sites have increased from our original preliminary capital cost estimate, which was based on 2020 NREL Annual Technology Baseline costs. The cost increases are beyond the Company’s control and not specific to the RMP, but rather due to industry-wide increases in equipment and labor costs, as we will discuss in more detail below. These cost increases are driven by equipment and materials for which we have now received bid pricing, including the battery energy storage systems and islanding switches, as well as transformers and other necessary equipment procured separately (i.e., outside the scope of the contractor selected through the RFP process). Based on this updated pricing, the RMP cannot be built at all three sites under the current \$9 million cost cap. We now estimate the project will cost approximately \$17.6 million, including O&M, before the estimated Inflation Reduction Act (IRA) investment tax credit benefits of approximately \$1.5 million, per the preliminary guidance from the Internal Revenue Service (IRS).

Consistent with the Order, we believe it is appropriate to reconsider how to move forward given the economic pressures the projects face. Each site provides varying benefits to the community and our customers, and the overall project provides an

---

<sup>1</sup> July 26, 2022 ORDER ACCEPTING 2021 INTEGRATED DISTRIBUTION SYSTEM PLAN AND CERTIFYING THE RESILIENT MINNEAPOLIS PROJECT, Docket No. E002/M-21-694, at Order Point 9.

opportunity to collaborate with our community partners, deepening our relationship and understanding of their energy priorities and needs in ways that support broader equity goals. However, we also understand that our customers are facing cost pressures of their own due to economy-wide inflation, and we are working – across the Company – to minimize costs for our customers.

We have looked at ways to bring the cost down for customers, including by securing tax benefits, which we discuss further below. We have also explored ways to mitigate the cost increase, including canceling or delaying the project, reducing the installed battery capacity at one or more sites, and reducing the number of sites. We discuss these possible alternatives further in Section I.E. While some alternatives have the benefit of reducing costs, they also have drawbacks. With all of this in mind, we intend to proceed with the design and implementation for two of the sites, Sabathani and MAIC, to keep those projects on track to achieve commercial operation by the end of 2024 as planned. At the same time, we are pausing the implementation at the third site, the North Minneapolis Community Resiliency Hub, pending a Commission decision on the Company's request to increase the cost cap for these projects, as discussed in detail below. This pause would delay commercial operation of the North Minneapolis site by approximately one year, i.e., to the end of 2025. We believe this approach is the best way to balance costs with customer and community benefits and provide stakeholders and the Commission with an opportunity to review and provide input on the cost increase discussed below.

In the remainder of this filing, we discuss:

- The results of our RFP and our updated schedule and cost estimates, including how we intend to maximize newly available tax credits for energy storage and microgrid controllers in the IRA to benefit our customers;
- Cost mitigation alternatives we considered;
- Our plan to move forward with the RMP at two sites, while temporarily pausing the third, largest site pending a Commission determination on our proposal to proceed; and
- Our request for an increased cost cap to \$17.6 million.

Given our goal of keeping the RMP projects on track to the extent possible, we request Commission action by July 13, 2023. This timing aligns with the provisions in the contract we are currently finalizing, which would enable us to proceed with the third site, if approved, achieving commercial operation at the third site by the end of 2025 and without being subject to additional contract costs.

## **I. DESCRIPTION AND PURPOSE OF FILING**

### **A. RMP Summary**

The Resilient Minneapolis Project seeks to improve communities' resilience to crises by installing solar/battery microgrids at three community center locations: the North Minneapolis Community Resiliency Hub, Sabathani Community Center, and MAIC (collectively referred to as the "RMP hosts"). At each site, the Company will work with the hosts to install rooftop solar (owned by the hosts), battery energy storage systems (BESS), microgrid controls, and necessary distribution system modifications to integrate these technologies. The microgrids when operating in "island" mode (i.e., during an electric system outage) will provide power for services critical to the communities that the RMP hosts serve. Recognizing that outages are generally infrequent and brief, and the need to fully utilize RMP assets to benefit all customers, the RMP BESS will also be dispatched on a routine basis to provide a variety of grid services and learnings to benefit all the Company's customers.<sup>2</sup>

### **B. RFP Process**

From the inception of RMP, we have sought to maximize the benefits of the project for our customers and communities while managing costs. We conducted a two-step process to select an engineer/procure/construct (EPC) contractor to build all three RMP microgrids. The two-step process was designed to, first, cast a wide net to make a large number of potential bidders aware of the RMP opportunity, and then, subsequently, narrow the field to a smaller number of technology- and project-appropriate bidders from whom the Company would seek a full proposal.

Consistent with this plan, the Company released a Request for Information (RFI) in October 2022 to identify a short list of bidders for the subsequent RFP. The RFI sought to identify bidders interested in the project. The RFI was sent to 21 potential bidders, and the Company received eight responses. After reviewing the RFI responses, we issued an RFP to seven potential bidders in November 2022. Three bidders submitted proposals in January 2023.

Although materially higher than our initial cost estimates from our November 2021 IDP, the proposals we received were similar in price, indicating that the cost increases are driven by industry-wide trends and are beyond the Company's control. Prices for battery energy storage systems have increased after years of steady decline. Since the

---

<sup>2</sup> See our December 1, 2022 Annual Report in this docket for further discussion of the sites and planned emergency service capabilities.



original preliminary budget estimate – which was based on the NREL Annual Technology Baseline for 2020 – costs of labor, transformers, batteries, and other electrical equipment have all increased due to supply chain challenges, COVID impacts, the economy-wide inflationary environment, and increased demand. As the Commission is aware, these industry dynamics have led to increased costs on a variety of projects, including both our owned projects, such as the Border Winds and Pleasant Valley wind repowering projects, as well as third-party projects, such as the solar PPAs for the Louise & Fillmore projects. These projects and the increasing costs they are facing are not unique in the industry. For example, across the U.S., battery storage project developers have sought to reopen contracts or have canceled battery projects outright due to inflationary pressures. Developers have requested sometimes dramatic price increases – upwards of 200 percent – in some contract renegotiations.<sup>3</sup>

After we received proposals that confirmed our expectation that our preliminary budget estimates were no longer valid, we took two actions.

First, we evaluated the proposals and then began contract negotiations. The bidding process and market dynamics discussed above required us to move quickly; bid pricing remains valid for a maximum of 90 days after we receive the initial bid. Delaying and rebidding the project some months from now likely would, based on industry-wide increases in labor costs and equipment lead times, result in a high likelihood that bid prices would continue to increase and that the project at all three sites would be delayed. We believe this approach of moving forward with contract negotiations was preferable to putting the entire project on hold. It allowed us to gather information needed to present a full budget picture while keeping options open, before presenting those options to the Commission.

Second, simultaneously with contract negotiations, we explored alternative options for RMP that would allow us to go forward with some variation of the project while reducing the cost increase relative to the \$9 million cap. We present these alternatives in Section E.

In evaluating the bids received in response to the RFP, we selected the supplier that will provide the most technically efficient and cost-effective BESS while meeting delivery schedules. One bidder was eliminated on the basis of our technical evaluation. Of the two remaining bids, we selected the contractor with the lower bid price. We began negotiations with our selected EPC contractor on March 22, and we anticipate executing the contract in early June.

---

<sup>3</sup> See, e.g., Garrett Hering, “Inflation unleashes wave of battery storage renegotiation in US,” July 8, 2022, available at <https://www.capitaliq.spglobal.com/web/client?auth=inherit#news/article?id=70845573>.

## C. Using IRA Tax Credits to Reduce Customer Costs

While costs of the project have increased compared to our initial estimates in 2021, we are committed to maximizing the benefits of the project for our customers, including by leveraging tax credits available under the IRA, which was passed after we proposed the project. In our Comments in Docket No. E999/CI-22-624, we summarized at a high level how the Company aims to leverage a broad range of tax credits, grants, and incentives in the IRA to accelerate our progress toward 100 percent carbon-free electricity while saving customers an estimated \$1.4 billion in costs over the next ten years.<sup>4</sup>

With respect to the RMP, we are working to ensure we take full advantage of a new Investment Tax Credit (ITC) in the IRA for energy storage systems and microgrid controllers and return the value of this ITC net of any transaction costs to our customers. In the RFP discussed above and based on current preliminary IRS guidance, we required bidders to meet the prevailing wage and qualified apprenticeship requirements of the IRA, which will ensure the RMP battery and microgrid control equipment qualifies for the full ITC of 30 percent, rather than the six percent “base” ITC. The qualified apprenticeship requirement slightly increases the cost of the project, but the increased cost is more than offset by the future tax credits. The requirement also will increase the workforce development benefits of the RMP because our selected contractor must commit to have at least 15 percent of labor hours performed by qualified apprentices enrolled in a registered training program. Those apprentices can go on to work on other clean energy projects in the future.

In addition, the EPC contractor we selected has committed to meet the IRA’s domestic content requirements that, based on our preliminary analysis of current guidance from the IRS, would qualify the project for an additional 10 percent bonus ITC. The Company will continue to monitor and carry out corresponding actions to maximize the ITC and commits to return the value of all tax credits to customers. In total, we estimate that the ITC could result in \$1.5 million in RMP project savings for our customers. Our updated estimates included in the analysis of alternatives below do not include the value of any ITC that would be returned to the Company’s customers, net of any transaction costs.

---

<sup>4</sup> Northern States Power Company, doing business as Xcel Energy. January 30, 2023 Comments in the *Joint Investigation into the Impacts of the Federal Inflation Reduction Act*. Docket No. E999/CI-22-624.

## D. Updated Cost Estimate

As shown in Table 1 below, we now expect the project's capital costs will be approximately \$16.9 million. Adding in anticipated annual O&M costs and maintenance and warranties fees brings our updated total estimate to \$17.6 million, before the anticipated ITC benefits of approximately \$1.5 million.

**Table 1: RMP Budget Estimate Comparison**

| <b>Capital Costs</b>                             |   |   |                                   |                                     |                              |
|--|---|---|-----------------------------------|-------------------------------------|------------------------------|
| <b>Capital Costs</b>                             | <b>Updated Estimates</b>                |   |                                   |                                     | <b>2021 Estimate</b>         |
|  | <b>North Minneapolis Resiliency Hub</b> | <b>Minneapolis American Indian Center</b> | <b>Sabathani Community Center</b> | <b>Updated Total Capital Budget</b> | <b>2021 Estimate - Total</b> |
| Battery Energy Storage System                    | \$4,230,000                             | \$1,700,000                               | \$1,770,000                       | \$7,710,000                         | \$4,003,449                  |
| Islanding Switch                                 | \$650,000                               | \$390,000                                 | \$390,000                         | \$1,430,000                         | \$725,400                    |
| Medium Voltage Work                              | \$2,490,000                             | \$1,080,000                               | \$1,080,000                       | \$4,650,000                         | \$298,096                    |
| Site Evaluation/Surveying/Prep                   | \$160,000                               | \$160,000                                 | \$160,000                         | \$490,000                           | \$634,260                    |
| Business Systems Integration                     | \$330,000                               | \$330,000                                 | \$330,000                         | \$1,000,000                         | \$990,822                    |
| Project Management and Labor                     | \$230,000                               | \$240,000                                 | \$240,000                         | \$710,000                           | \$739,040                    |
| Communications                                   | \$120,000                               | \$130,000                                 | \$130,000                         | \$370,000                           | \$1,547,810                  |
| Costs Due to Delaying One Site                   | \$500,000                               | \$0                                       | \$0                               | \$500,000                           | \$0                          |
| <b>Total Capital Costs</b>                       | <b>\$8,730,000</b>                      | <b>\$4,030,000</b>                        | <b>\$4,100,000</b>                | <b>\$16,860,000</b>                 | <b>\$8,938,878</b>           |
| <b>O&amp;M Costs</b>                             |   |   |                                   |                                     |                              |
|  | <b>North Minneapolis Resiliency Hub</b> | <b>Minneapolis American Indian Center</b> | <b>Sabathani Community Center</b> | <b>Updated Total O&amp;M Budget</b> | <b>2021 Estimate - Total</b> |
| 10 Years Maintenance Fees                        | \$390,000                               | \$170,000                                 | \$170,000                         | \$730,000                           | \$624,030                    |
| <b>Total Project Costs (Capital and O&amp;M)</b> |   |   |                                   |                                     |                              |
|  | <b>North Minneapolis Resiliency Hub</b> | <b>Minneapolis American Indian Center</b> | <b>Sabathani Community Center</b> | <b>Updated Total Budget</b>         | <b>2021 Estimate - Total</b> |
| <b>Total Costs</b>                               | <b>\$9,120,000</b>                      | <b>\$4,200,000</b>                        | <b>\$4,270,000</b>                | <b>\$17,590,000</b>                 | <b>\$9,562,908</b>           |

We are completing contract negotiations with our selected EPC contractor now. As we will discuss in Section E, through our negotiations we have found creative ways to

mitigate risk to the extent possible while maintaining optionality and keeping the projects moving forward.

In addition to the information from our recent RFP, Table 1 reflects updated costs for materials and labor that are outside the scope of the EPC contract. Specifically, the line item labeled “Miscellaneous” in the 2021 filing has been redistributed to reflect updates to costs as well as better granularity in the estimate. The “Miscellaneous” category was comprised of items related to Medium Voltage and Communications work; as a result, the old category was adjusted to reflect this better understanding. The increases in the Medium Voltage category reflect the increased costs of transformers, switch gear, and the related interconnection work.

## **E. Alternatives Considered**

As we evaluated bids and began contract negotiations, we explored various ways to reduce risk and control costs while, to the extent possible, moving forward with the RMP. We considered three alternatives: (1) delaying or canceling the project at all three sites; (2) reducing the installed battery capacity at one or more sites; and (3) reducing the number of sites. We provide an overview of each alternative below. Each alternative reduces costs to varying degrees but also has drawbacks. Of the alternatives, we conclude that proceeding with the projects at Sabathani and MAIC, while temporarily pausing implementation at the North Minneapolis Community Resiliency Hub pending a Commission determination, is the most reasonable way to keep RMP moving forward while the Commission considers our Petition.

### *1. Project Delay or Cancellation*

We understand the financial pressures facing our customers, and we are continually working to find ways to reduce expenses. In light of this, given the cost increases for the RMP, we considered canceling the project outright, but we still believe in the value of the project to our customers and communities, and we want to move forward in partnership with the hosts. As we discussed in our original (2021 IDP) filing, we believe the RMP provides value not just to the three microgrid hosts – supporting resilience hubs for the large number of people they serve – but also to all our customers via the opportunity to test and learn from the year-round dispatch of battery systems to serve a variety of different use cases.

We also explored delaying or pausing RMP at all three sites. This approach would provide more time for parties to revisit the project as a whole, given the increased costs; however, the updated costs would be far from certain as we would need to pause contract negotiations pending Commission action and then likely issue another

RFP. Therefore, this approach would be unlikely to reduce costs; on the contrary, we believe project costs in a later reissued RFP would increase further.

## 2. *Reduction in Battery Capacity*

We considered whether reducing the size of one or more of the projects would be a reasonable alternative to reduce costs. In effect, this would mean reducing the installed capacity of the BESS at a site. The BESS capacities were originally designed to support certain minimum critical loads at each resilience hub, for a certain minimum outage duration. Reducing the installed BESS capacity would reduce costs, but simultaneously reduce the maximum electrical load that could be supported, the maximum outage duration through which this load could be sustained, or both.

At Sabathani and MAIC, the current BESS sizing was determined based on the resilience hub's purpose, identified by the hosts: to serve as an emergency refuge or community gathering space delivering critical services during an outage. The planned BESS installed capacity will support the critical services identified by the hosts, for a minimum outage duration (including the possibility of extending this duration by recharging with solar generation and/or curtailing non-critical loads).<sup>5</sup> For these two sites, the planned BESS sizes are the minimum viable size required to sustain the services hosts deem critical to the sites serving as a resilience hub for their communities. In other words, with a smaller BESS, those two resilience hubs would not be able to serve the primary purpose for which they are designed.

The North Minneapolis Community Resiliency Hub is significantly larger and has a slightly different primary function. This microgrid is designed to serve three buildings: the Minneapolis Public Schools (MPS) Nutrition Center, Franklin Middle School, and Hall Elementary School. The planned BESS sizing, at 1.5 MW/3 MWh, is designed to support the summer peak load of all three buildings (assumed to be coincident) for two hours. However, our project leads, Renewable Energy Partners and MPS, conceived this project with the primary resilience purpose being to support the Nutrition Center to function as an emergency operations center and food service location in the event of an outage. Unlike Sabathani and MAIC, this resilience hub is not primarily conceived as an emergency shelter in which Franklin and/or Hall schools would house community members during an outage – though that remains a desirable secondary purpose if those two buildings were also part of the microgrid.

---

<sup>5</sup> See our December 1, 2022 RMP annual report for a description of how those critical loads were identified working with the hosts.

Thus, it would be possible to lower costs by limiting the North Minneapolis Community Resiliency Hub to a single building (the Nutrition Center) and its primary purpose – forgoing the option for Franklin and Hall schools to be supported and serve as community gathering spaces. This option would involve installing only 1 MW/2 MWh, rather than the originally designed 1.5 MW/3MWh at the North Minneapolis site. We estimate that reducing the battery size in this way could save approximately \$1.4 million.<sup>6</sup>

However, reducing the microgrid size would change the nature of the North Minneapolis resilience hub from a three-building microgrid with the potential to provide community gathering spaces at the schools, to a single-building microgrid serving solely as an emergency operations center and food service location. Further, reducing the scope of the North Minneapolis site would create technical feasibility challenges that would need to be addressed.

For these reasons, we believe the drawbacks of this approach outweigh the estimated cost reduction of \$1.4 million.

### *3. Reduction in Number of Sites*

Finally, we considered the option of reducing RMP to two sites and not moving forward with the third site at all. In this alternative, the North Minneapolis site would be the project with which we did not proceed because of its larger size and corresponding cost. As shown in Table 1, if the Company did not implement the North Minneapolis microgrid, it would still be possible to implement the projects at Sabathani and MAIC within the Commission’s \$9 million cost cap. If either Sabathani or MAIC were not implemented, it would not be possible to implement the North Minneapolis site and a second microgrid site for a cost close to the \$9 million cap.

We do not advocate for this alternative because each RMP site was chosen to provide distinct services and benefits to its local community, which has unique needs and varying vulnerabilities in the event of a climate change-induced extreme weather or other emergency. As such, we prefer to move forward with RMP at all three sites; however, we acknowledge that the cost increases are significant. Therefore, as we will discuss below, we propose to pause implementation of RMP at the North Minneapolis site while, through prudent contract negotiations, maintaining optionality as we seek the Commission’s input.

---

<sup>6</sup> Compared to our recommended alternative of pausing implementation at the North Minneapolis site.

## **F. Implementation Next Steps and Request for Increased Cost Cap**

We are confident in our ability to implement the RMP at Sabathani and MAIC within the \$9 million cap, and the Company will bear the burden of demonstrating prudence for all costs. As discussed above, macroeconomic trends and industry dynamics necessitated that we move forward with contract negotiations or risk further price increases that would put the entire project in jeopardy. However, we have worked with our selected vendor to ensure that the contract gives the Company the option to move forward with the third site. We are still finalizing the terms and expect to execute the contract in early June, and we intend to incorporate a limited notice to proceed provision for the North Minneapolis Community Resiliency Hub. Including this provision allows us to lock in firm pricing for Sabathani and MAIC, avoiding further cost increases for those two sites. Upon contract execution, we intend to order equipment and begin engineering work with the hosts and the EPC contractor – keeping these two microgrid projects on track to achieve commercial operation by the end of 2024. Later, we can provide the EPC contractor with notice to proceed on the North Minneapolis site, should the Commission determine that our request for an increased cost cap is reasonable.

That said, maintaining optionality through this contracting approach does have cost and timing impacts. With this approach, implementation at the North Minneapolis site, if approved, would happen later, so it would be unlikely to achieve commercial operation until the end of 2025. In addition, the EPC contractor would need to mobilize twice for construction, adding approximately \$500,000 to the North Minneapolis project cost, as shown in Table 1 above. Nevertheless, we believe this is the best approach to realize the benefits of RMP as the Commission considers our petition.

## **CONCLUSION**

Since the Commission's approval last June, we have continued to collaborate closely with the RMP hosts through the project planning and design process. Building those partnerships and developing these projects over the last two years has reinforced for us how important the RMP resilience hubs are to our partners and the communities they serve. Equally, we look forward to the learning opportunity RMP will provide for deploying battery systems to deliver a broad range of grid services to the benefit of all our customers. However, costs for the project have increased due to factors outside the Company's control, and we understand and appreciate the need to control costs that will be borne by our customers in a challenging economic environment.

Therefore, we submit this petition to engage the Commission in a discussion about the RMP and how to proceed. In the interim, to make progress toward realizing the benefits of the project, we are moving forward with the project at Sabathani and MAIC.

We do wish to move forward with the project at the North Minneapolis Community Resiliency Hub, and therefore we respectfully request the Commission take the following action by July 13, 2023:

- Increase the Resilient Minneapolis Project cost cap to \$17.6 million.

The Company has notified our three partners – Sabathani Community Center, MAIC, and Renewable Energy Partners – of the rationale for this filing and our intention to move forward with the Sabathani and MAIC microgrids while temporarily pausing the North Minneapolis site pending further discussion with the Commission. We will continue to keep the hosts informed as this discussion continues.

Dated: April 19, 2023

Northern States Power Company



STATE OF MINNESOTA  
BEFORE THE  
MINNESOTA PUBLIC UTILITIES COMMISSION

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

IN THE MATTER OF XCEL ENERGY'S 2021  
INTEGRATED DISTRIBUTION SYSTEM  
PLAN

DOCKET NO. E002/M-21-694

**PETITION FOR APPROVAL OF  
UPDATED COSTS FOR THE RESILIENT  
MINNEAPOLIS PROJECT**

**SUMMARY OF FILING**

Please take notice that on April 19, 2023, Northern States Power Company doing business as Xcel Energy filed with the Minnesota Public Utilities Commission a Petition requesting approval of updated costs for the Resilient Minneapolis Project (RMP).

## CERTIFICATE OF SERVICE

I, Marie Horner, 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 No.      E002/M-21-694**

Dated this 19<sup>th</sup> day of April 2023

/s/

---

Marie Horner  
Regulatory Administrator

[illegible]

| First Name | Last Name | Email                           | Company Name                    | Address   | Delivery Method    | View Trade Secret | Service List Name    |
|------------|-----------|---------------------------------|---------------------------------|---|--------------------|-------------------|----------------------|
| Gail       | Baranko   | gail.baranko@xcelenergy.com     | Xcel Energy                     | 414 Nicollet Mall 7th Floor<br><br>Minneapolis,<br>MN<br>55401            | Electronic Service | No                | OFF_SL_21-694_21-694 |
| Jessica L  | Bayles    | Jessica.Bayles@stoel.com        | Stoel Rives LLP                 | 1150 18th St NW Ste 325<br><br>Washington,<br>DC<br>20036                 | Electronic Service | No                | OFF_SL_21-694_21-694 |
| Mathias    | Bell      | mathias@weavegrid.com           | Weave Grid, Inc.                | 222 7th Street, 2nd floor<br><br>San Francisco,<br>California<br>94103    | Electronic Service | No                | OFF_SL_21-694_21-694 |
| James J.   | Bertrand  | james.bertrand@stinson.com      | STINSON LLP                     | 50 S 6th St Ste 2600<br><br>Minneapolis,<br>MN<br>55402                   | Electronic Service | No                | OFF_SL_21-694_21-694 |
| Derek      | Bertsch   | derek.bertsch@mrenergy.com      | Missouri River Energy Services  | 3724 West Avera Drive<br>PO Box 88920<br>Sioux Falls,<br>SD<br>57109-8920 | Electronic Service | No                | OFF_SL_21-694_21-694 |
| William    | Black     | bblack@mmua.org                 | MMUA                            | Suite 200<br>3131 Fernbrook Lane North<br><br>Plymouth,<br>MN<br>55447    | Electronic Service | No                | OFF_SL_21-694_21-694 |
| Zoe        | Bourgerie | zoe.bourgerie@minneapolismn.gov | Minneapolis City of Lakes       | 350 S 5th St Rm 307<br><br>Minneapolis,<br>MN<br>55415                    | Electronic Service | No                | OFF_SL_21-694_21-694 |
| Kenneth    | Bradley   | kbradley1965@gmail.com          |                                 | 2837 Emerson Ave S Apt<br>CW112<br><br>Minneapolis,<br>MN<br>55408        | Electronic Service | No                | OFF_SL_21-694_21-694 |
| Elizabeth  | Brama     | ebrama@taftlaw.com              | Taft Stettinius & Hollister LLP | 2200 IDS Center<br>80 South 8th Street<br>Minneapolis,<br>MN<br>55402     | Electronic Service | No                | OFF_SL_21-694_21-694 |
|            |           |                                 |                                 |   |                    |                   |                      |

| First Name | Last Name | Email                        | Company Name                               | Address  | Delivery Method    | View Trade Secret | Service List Name    |
|------------|-----------|------------------------------|--|--|--------------------|-------------------|----------------------|
| Jon        | Brekke    | jbrekke@grenergy.com         | Great River Energy                         | 12300 Elm Creek Boulevard<br><br>Maple Grove,<br>MN<br>553694718           | Electronic Service | No                | OFF_SL_21-694_21-694 |
| Sydney R.  | Briggs    | sbriggs@swce.coop            | Steele-Waseca Cooperative Electric         | 2411 W. Bridge St<br>PO Box 485<br>Owatonna,<br>MN<br>55060-0485           | Electronic Service | No                | OFF_SL_21-694_21-694 |
| Mark B.    | Bring     | mbring@otpc.com              | Otter Tail Power Company                   | 215 South Cascade Street<br>PO Box 496<br>Fergus Falls,<br>MN<br>565380496 | Electronic Service | No                | OFF_SL_21-694_21-694 |
| Janet      | Brown     | jab5100@gmail.com            | Sabathani Community Center (Sabathani/SCC) | 310 E 38th St Ste 200<br><br>Minneapolis,<br>MN<br>55409                   | Electronic Service | No                | OFF_SL_21-694_21-694 |
| Christina  | Brusven   | cbrusven@fredlaw.com         | Fredrikson Byron                           | 200 S 6th St Ste 4000<br><br>Minneapolis,<br>MN<br>554021425               | Electronic Service | No                | OFF_SL_21-694_21-694 |
| LORI       | CLOBES    | lclobes@mienergy.coop        | MiEnergy Cooperative                       | 31110 COOPERATIVE WAY<br>PO BOX 626<br>RUSHFORD,<br>MN<br>55971            | Electronic Service | No                | OFF_SL_21-694_21-694 |
| James      | Canaday   | james.canaday@ag.state.mn.us | Office of the Attorney General-RUD         | Suite 1400<br>445 Minnesota St.<br>St. Paul,<br>MN<br>55101                | Electronic Service | No                | OFF_SL_21-694_21-694 |
| Douglas M. | Carnival  | dmc@mcgrannshea.com          | McGrann Shea Carnival Straughn & Lamb      | N/A  | Electronic Service | No                | OFF_SL_21-694_21-694 |
| Ray        | Choquette | rchoquette@agp.com           | Ag Processing Inc.                         | 12700 West Dodge Road<br>PO Box 2047<br>Omaha,<br>NE<br>68103-2047         | Electronic Service | No                | OFF_SL_21-694_21-694 |
| John       | Coffman   | john@johncoffman.net         | AARP                                       | 871 Tuxedo Blvd.<br><br>St. Louis,<br>MO<br>63119-2044                     | Electronic Service | No                | OFF_SL_21-694_21-694 |
|            |           |                              |  |  |                    |                   |                      |

| First Name     | Last Name          | Email                             | Company Name                            | Address  | Delivery Method    | View Trade Secret | Service List Name    |
|----------------|--------------------|-----------------------------------|---|--|--------------------|-------------------|----------------------|
| Kenneth A.     | Colburn            | kcolburn@sympbioticstrategies.com | Symbiotic Strategies, LLC               | 26 Winton Road<br><br>Meredith,<br>NH<br>32535413                            | Electronic Service | No                | OFF_SL_21-694_21-694 |
| Generic Notice | Commerce Attorneys | commerce.attorneys@ag.state.mn.us | Office of the Attorney General-DOC      | 445 Minnesota Street Suite 1400<br><br>St. Paul,<br>MN<br>55101              | Electronic Service | Yes               | OFF_SL_21-694_21-694 |
| Riley          | Conlin             | riley.conlin@stoel.com            | Stoel Rives LLP                         | 33 S. 6th Street<br>Suite 4200<br>Minneapolis,<br>MN<br>55402                | Electronic Service | No                | OFF_SL_21-694_21-694 |
| George         | Crocker            | gwillc@nawo.org                   | North American Water Office             | PO Box 174<br><br>Lake Elmo,<br>MN<br>55042                                  | Electronic Service | No                | OFF_SL_21-694_21-694 |
| David          | Dahlberg           | davedahlberg@nweco.com            | Northwestern Wisconsin Electric Company | P.O. Box 9<br>104 South Pine Street<br>Grantsburg,<br>WI<br>548400009        | Electronic Service | No                | OFF_SL_21-694_21-694 |
| James          | Denniston          | james.r.denniston@xcenergy.com    | Xcel Energy Services, Inc.              | 414 Nicollet Mall, 401-8<br><br>Minneapolis,<br>MN<br>55401                  | Electronic Service | No                | OFF_SL_21-694_21-694 |
| Curt           | Dieren             | curt.dieren@dgr.com               | L&O Power Cooperative                   | 1302 S Union St<br><br>Rock Rapids,<br>IA<br>51246                           | Electronic Service | No                | OFF_SL_21-694_21-694 |
| Carlton        | Doyle Fontaine     | carlton.doyle.fontaine@senate.mn  | MN Senate                               | 75 Rev Dr Martin Luther King Jr Blvd<br>Room G-17<br>St Paul,<br>MN<br>55155 | Electronic Service | No                | OFF_SL_21-694_21-694 |
| Kristen        | Eide Tollefson     | healingsystems69@gmail.com        | R-CURE                                  | 28477 N Lake Ave<br><br>Frontenac,<br>MN<br>55026-1044                       | Electronic Service | No                | OFF_SL_21-694_21-694 |
|                |                    |                                   |   |  |                    |                   |                      |

| First Name | Last Name | Email                             | Company Name                      | Address   | Delivery Method    | View Trade Secret | Service List Name    |
|------------|-----------|-----------------------------------|-----------------------------------|---|--------------------|-------------------|----------------------|
| Rebecca    | Eilers    | rebecca.d.eilers@xcelenergy.com   | Xcel Energy                       | 414 Nicollet Mall - 401 7th Floor<br><br>Minneapolis,<br>MN<br>55401                | Electronic Service | No                | OFF_SL_21-694_21-694 |
| Bob        | Eleff     | bob.eleff@house.mn                | Regulated Industries Cmte         | 100 Rev Dr Martin Luther King Jr Blvd<br>Room 600<br>St. Paul,<br>MN<br>55155       | Electronic Service | No                | OFF_SL_21-694_21-694 |
| Betsy      | Engelking | betsy@nationalgridrenewables.com  | Geronimo Energy, LLC              | 8400 Normandale Lake Blvd<br><br>Ste 1200<br>Bloomington,<br>MN<br>55437            | Electronic Service | No                | OFF_SL_21-694_21-694 |
| Oncu       | Er        | oncu.er@avantenergy.com           | Avant Energy, Agent for MMPA      | 220 S. Sixth St. Ste. 1300<br><br>Minneapolis,<br>MN<br>55402                       | Electronic Service | No                | OFF_SL_21-694_21-694 |
| James C.   | Erickson  | jericksonkbc@gmail.com            | Kelly Bay Consulting              | 17 Quechee St<br><br>Superior,<br>WI<br>54880-4421                                  | Electronic Service | No                | OFF_SL_21-694_21-694 |
| Catherine  | Fair      | catherine@energycents.org         | Energy CENTS Coalition            | 823 E 7th St<br><br>St Paul,<br>MN<br>55106   | Electronic Service | No                | OFF_SL_21-694_21-694 |
| John       | Farrell   | jfarrell@ilsr.org                 | Institute for Local Self-Reliance | 2720 E. 22nd St<br>Institute for Local Self-Reliance<br>Minneapolis,<br>MN<br>55406 | Electronic Service | No                | OFF_SL_21-694_21-694 |
| Sharon     | Ferguson  | sharon.ferguson@state.mn.us       | Department of Commerce            | 85 7th Place E Ste 280<br><br>Saint Paul,<br>MN<br>551012198                        | Electronic Service | No                | OFF_SL_21-694_21-694 |
| Nathan     | Franzen   | nathan@nationalgridrenewables.com | Geronimo Energy, LLC              | 8400 Normandale Lake Blvd<br><br>Ste 1200<br>Bloomington,<br>MN<br>55437            | Electronic Service | No                | OFF_SL_21-694_21-694 |
|            |           |                                   |                                   |   |                    |                   |                      |

| First Name | Last Name  | Email                            | Company Name                         | Address  | Delivery Method    | View Trade Secret | Service List Name    |
|------------|------------|----------------------------------|--------------------------------------|--|--------------------|-------------------|----------------------|
| Hal        | Galvin     | halgalvin@comcast.net            | Provectus Energy Development llc     | 1936 Kenwood Parkway<br><br>Minneapolis,<br>MN<br>55405              | Electronic Service | No                | OFF_SL_21-694_21-694 |
| Edward     | Garvey     | edward.garvey@AESLconsulting.com | AESL Consulting                      | 32 Lawton St<br><br>Saint Paul,<br>MN<br>55102-2617                  | Electronic Service | No                | OFF_SL_21-694_21-694 |
| Edward     | Garvey     | garveyed@aol.com                 | Residence                            | 32 Lawton St<br><br>Saint Paul,<br>MN<br>55102                       | Electronic Service | No                | OFF_SL_21-694_21-694 |
| Bruce      | Gerhardson | bgerhardson@otpc.com             | Otter Tail Power Company             | PO Box 496<br>215 S Cascade St<br>Fergus Falls,<br>MN<br>565380496   | Electronic Service | No                | OFF_SL_21-694_21-694 |
| Allen      | Gleckner   | gleckner@fresh-energy.org        | Fresh Energy                         | 408 St. Peter Street<br>Ste 350<br>Saint Paul,<br>Minnesota<br>55102 | Electronic Service | No                | OFF_SL_21-694_21-694 |
| Jenny      | Glumack    | jenny@mrea.org                   | Minnesota Rural Electric Association | 11640 73rd Ave N<br><br>Maple Grove,<br>MN<br>55369                  | Electronic Service | No                | OFF_SL_21-694_21-694 |
| Natalie    | Haberman   | townsend@fresh-energy.org        | Fresh Energy                         | 408 St Peter St # 350<br><br>St. Paul,<br>Minnesota<br>55102         | Electronic Service | No                | OFF_SL_21-694_21-694 |
| Joe        | Halso      | joe.halso@sierraclub.org         | Sierra Club                          | 1536 Wynkoop St Ste 200<br><br>Denver,<br>CO<br>80202                | Electronic Service | No                | OFF_SL_21-694_21-694 |
| Kim        | Havey      | kim.havey@minneapolismn.gov      | City of Minneapolis                  | 350 South 5th Street,<br>Suite 315M<br>Minneapolis,<br>MN<br>55415   | Electronic Service | No                | OFF_SL_21-694_21-694 |
| Todd       | Headlee    | theadlee@dvigridsolutions.com    | Dominion Voltage, Inc.               | 701 E. Cary Street<br><br>Richmond,<br>VA<br>23219                   | Electronic Service | No                | OFF_SL_21-694_21-694 |



| 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<br>Minneapolis,<br>MN<br>55401         | Electronic Service | No                | OFF_SL_21-694_21-694 |
| Adam       | Heinen    | aheinen@dakotaelectric.com            | Dakota Electric Association                        | 4300 220th St W<br>Farmington,<br>MN<br>55024                   | Electronic Service | No                | OFF_SL_21-694_21-694 |
| Jared      | Hendricks | jared.hendricks@owatonnautilities.com | Owatonna Municipal Public Utilities                | PO Box 800<br>208 S Walnut Ave<br>Owatonna,<br>MN<br>55060-2940 | Electronic Service | No                | OFF_SL_21-694_21-694 |
| Annete     | Henkel    | mui@mutilityinvestors.org             | Minnesota Utility Investors                        | 413 Wacouta Street<br>#230<br>St. Paul,<br>MN<br>55101          | Electronic Service | No                | OFF_SL_21-694_21-694 |
| Sandra     | Henry     | Sandra.Henry@elevatenp.org            | Elevate  | 322 S Green St Ste 300<br>Chicago,<br>IL<br>60607               | Electronic Service | No                | OFF_SL_21-694_21-694 |
| Joe        | Hoffman   | ja.hoffman@smmpa.org                  | SMMPA  | 500 First Ave SW<br>Rochester,<br>MN<br>55902-3303              | Electronic Service | No                | OFF_SL_21-694_21-694 |
| Michael    | Hoppe     | lu23@ibew23.org                       | Local Union 23, I.B.E.W.                           | 445 Etna Street<br>Ste. 61<br>St. Paul,<br>MN<br>55106          | Electronic Service | No                | OFF_SL_21-694_21-694 |
| Samantha   | Houston   | shouston@ucsusa.org                   | Union of Concerned Scientists                      | 1825 K St. NW Ste 800<br>Washington,<br>DC<br>20006             | Electronic Service | No                | OFF_SL_21-694_21-694 |
| Jan        | Hubbard   | jan.hubbard@comcast.net               |  | 7730 Mississippi Lane<br>Brooklyn Park,<br>MN<br>55444          | Electronic Service | No                | OFF_SL_21-694_21-694 |
| Geoffrey   | Inge      | ginge@regintl.com                     | Regulatory Intelligence LLC                        | PO Box 270636<br>Superior,<br>CO<br>80027-9998                  | Electronic Service | No                | OFF_SL_21-694_21-694 |

| First Name | Last Name        | Email                            | Company Name                        | Address  | Delivery Method    | View Trade Secret | Service List Name    |
|------------|------------------|----------------------------------|-------------------------------------|--|--------------------|-------------------|----------------------|
| Ralph      | Jacobson         | ralphj@ips-solar.com             |                                     | 2126 Roblyn Avenue<br><br>Saint Paul,<br>Minnesota<br>55104                            | Electronic Service | No                | OFF_SL_21-694_21-694 |
| Casey      | Jacobson         | cjacobson@bepc.com               | Basin Electric Power<br>Cooperative | 1717 East Interstate<br>Avenue<br><br>Bismarck,<br>ND<br>58501                         | Electronic Service | No                | OFF_SL_21-694_21-694 |
| John S.    | Jaffray          | jjaffray@jrpowers.com            | JJR Power                           | 350 Highway 7 Suite 236<br><br>Excelsior,<br>MN<br>55331                               | Electronic Service | No                | OFF_SL_21-694_21-694 |
| Alan       | Jenkins          | aj@jenkinsatlaw.com              | Jenkins at Law                      | 2950 Yellowtail Ave.<br><br>Marathon,<br>FL<br>33050                                   | Electronic Service | No                | OFF_SL_21-694_21-694 |
| Andrea     | Jenkins          | Andrea.Jenkins@minneapolismn.gov | Minneapolis City of Lakes           | 350 S 5th St Room 307<br><br>Minneapolis,<br>MN<br>55415                               | Electronic Service | No                | OFF_SL_21-694_21-694 |
| Richard    | Johnson          | Rick.Johnson@lawmoss.com         | Moss & Barnett                      | 150 S. 5th Street<br>Suite 1200<br>Minneapolis,<br>MN<br>55402                         | Electronic Service | No                | OFF_SL_21-694_21-694 |
| Sarah      | Johnson Phillips | sarah.phillips@stoel.com         | Stoel Rives LLP                     | 33 South Sixth Street<br>Suite 4200<br>Minneapolis,<br>MN<br>55402                     | Electronic Service | No                | OFF_SL_21-694_21-694 |
| Nate       | Jones            | njones@hcpd.com                  | Heartland Consumers<br>Power        | PO Box 248<br><br>Madison,<br>SD<br>57042  | Electronic Service | No                | OFF_SL_21-694_21-694 |
| Mahmoud    | Kabalan          | mahmoud.kabalan@stthomas.edu     | University of St Thomas             | 2115 Summit Ave. Mail<br>OSS100<br>School of Engineering<br>Saint Paul,<br>MN<br>55105 | Electronic Service | No                | OFF_SL_21-694_21-694 |
|            |                  |                                  |                                     |  |                    |                   |                      |

| First Name | Last Name | Email                       | Company Name                       | Address   | Delivery Method    | View Trade Secret | Service List Name    |
|------------|-----------|-----------------------------|------------------------------------|---|--------------------|-------------------|----------------------|
| Michael    | Kampmeyer | mkampmeyer@a-e-group.com    | AEG Group, LLC                     | 260 Salem Church Road<br><br>Sunfish Lake,<br>Minnesota<br>55118        | Electronic Service | No                | OFF_SL_21-694_21-694 |
| Nick       | Kaneski   | nick.kaneski@enbridge.com   | Enbridge Energy Company, Inc.      | 11 East Superior St Ste 125<br><br>Duluth,<br>MN<br>55802               | Electronic Service | No                | OFF_SL_21-694_21-694 |
| William D  | Kenworthy | will@votesolar.org          | Vote Solar                         | 332 S Michigan Ave FL 9<br><br>Chicago,<br>IL<br>60604                  | Electronic Service | No                | OFF_SL_21-694_21-694 |
| Samuel B.  | Ketchum   | sketchum@kennedy-graven.com | Kennedy & Graven, Chartered        | 150 S 5th St Ste 700<br>Minneapolis,<br>MN<br>55402                     | Electronic Service | No                | OFF_SL_21-694_21-694 |
| Brad       | Klein     | bklein@elpc.org             | Environmental Law & Policy Center  | 35 E. Wacker Drive, Suite 1600<br>Suite 1600<br>Chicago,<br>IL<br>60601 | Electronic Service | No                | OFF_SL_21-694_21-694 |
| Brian      | Krambeer  | bkrambeer@mienergy.coop     | MiEnergy Cooperative               | PO Box 626<br>31110 Cooperative Way<br>Rushford,<br>MN<br>55971         | Electronic Service | No                | OFF_SL_21-694_21-694 |
| Michael    | Krause    | michaelkrause61@yahoo.com   | Kandiyo Consulting, LLC            | 433 S 7th Street<br>Suite 2025<br>Minneapolis,<br>Minnesota<br>55415    | Electronic Service | No                | OFF_SL_21-694_21-694 |
| Mary       | LaGarde   | mlagarde@maicnet.org        | Minneapolis American Indian Center | 1530 E Franklin Ave<br><br>Minneapolis,<br>MN<br>55404                  | Electronic Service | No                | OFF_SL_21-694_21-694 |
| Matthew    | Lacey     | mlacey@greenergy.com        | Great River Energy                 | 12300 Elm Creek Boulevard<br><br>Maple Grove,<br>MN<br>553694718        | Electronic Service | No                | OFF_SL_21-694_21-694 |
|            |           |                             |                                    |   |                    |                   |                      |

| First Name | Last Name     | Email                          | Company Name                         | Address   | Delivery Method    | View Trade Secret | Service List Name    |
|------------|---------------|--------------------------------|--------------------------------------|---|--------------------|-------------------|----------------------|
| Carmel     | Laney         | carmel.laney@stoel.com         | Stoel Rives LLP                      | 33 South Sixth Street<br>Suite 4200<br>Minneapolis,<br>MN<br>55402    | Electronic Service | No                | OFF_SL_21-694_21-694 |
| Peder      | Larson        | plarson@larkinhoffman.com      | Larkin Hoffman Daly & Lindgren, Ltd. | 8300 Norman Center Drive<br>Suite 1000<br>Bloomington,<br>MN<br>55437 | Electronic Service | No                | OFF_SL_21-694_21-694 |
| James D.   | Larson        | james.larson@avantenergy.com   | Avant Energy Services                | 220 S 6th St Ste 1300<br><br>Minneapolis,<br>MN<br>55402              | Electronic Service | No                | OFF_SL_21-694_21-694 |
| Dean       | Leischow      | dean@sunrisenrg.com            | Sunrise Energy Ventures              | 315 Manitoba Ave Ste 200<br><br>Wayzata,<br>MN<br>55391               | Electronic Service | No                | OFF_SL_21-694_21-694 |
| Annie      | Levenson Falk | annief@cupminnesota.org        | Citizens Utility Board of Minnesota  | 332 Minnesota Street,<br>Suite W1360<br><br>St. Paul,<br>MN<br>55101  | Electronic Service | No                | OFF_SL_21-694_21-694 |
| Ryan       | Long          | ryan.j.long@xcelenergy.com     | Xcel Energy                          | 414 Nicollet Mall<br>401 8th Floor<br>Minneapolis,<br>MN<br>55401     | Electronic Service | No                | OFF_SL_21-694_21-694 |
| Susan      | Ludwig        | sludwig@mnpower.com            | Minnesota Power                      | 30 West Superior Street<br><br>Duluth,<br>MN<br>55802                 | Electronic Service | No                | OFF_SL_21-694_21-694 |
| Alice      | Madden        | alice@communitypowermn.org     | Community Power                      | 2720 E 22nd St<br><br>Minneapolis,<br>MN<br>55406                     | Electronic Service | No                | OFF_SL_21-694_21-694 |
| Kavita     | Maini         | kmairi@wi.rr.com               | KM Energy Consulting, LLC            | 961 N Lost Woods Rd<br><br>Oconomowoc,<br>WI<br>53066                 | Electronic Service | No                | OFF_SL_21-694_21-694 |
| Mary       | Martinka      | mary.a.martinka@xcelenergy.com | Xcel Energy Inc                      | 414 Nicollet Mall<br>7th Floor<br>Minneapolis,<br>MN<br>55401         | Electronic Service | No                | OFF_SL_21-694_21-694 |

| First Name | Last Name   | Email                            | Company Name                        | Address  | Delivery Method    | View Trade Secret | Service List Name    |
|------------|-------------|----------------------------------|-------------------------------------|--|--------------------|-------------------|----------------------|
| Samuel     | Mason       | smason@beltramielectric.com      | Beltrami Electric Cooperative, Inc. | 4111 Technology Dr. NW<br>PO Box 488<br>Bemidji,<br>MN<br>56619-0488     | Electronic Service | No                | OFF_SL_21-694_21-694 |
| Gregg      | Mast        | gmast@cleanenergyeconomy.mn.org  | Clean Energy Economy Minnesota      | 4808 10th Avenue S<br><br>Minneapolis,<br>MN<br>55417                    | Electronic Service | No                | OFF_SL_21-694_21-694 |
| Thomas     | Melone      | Thomas.Melone@AllcoUS.com        | Minnesota Go Solar LLC              | 222 South 9th Street<br>Suite 1600<br>Minneapolis,<br>Minnesota<br>55120 | Electronic Service | No                | OFF_SL_21-694_21-694 |
| Stacy      | Miller      | stacy.miller@minneapolismn.gov   | City of Minneapolis                 | 350 S. 5th Street<br>Room M 301<br>Minneapolis,<br>MN<br>55415           | Electronic Service | No                | OFF_SL_21-694_21-694 |
| David      | Moeller     | dmoeller@allte.com               | Minnesota Power                     | 30 W Superior St<br><br>Duluth,<br>MN<br>558022093                       | Electronic Service | No                | OFF_SL_21-694_21-694 |
| Dalene     | Monsebroten | dalene.monsebroten@nmpagency.com | Northern Municipal Power Agency     | 123 2nd St W<br><br>Thief River Falls,<br>MN<br>56701                    | Electronic Service | No                | OFF_SL_21-694_21-694 |
| Andrew     | Moratzka    | andrew.moratzka@stoel.com        | Stoel Rives LLP                     | 33 South Sixth St Ste 4200<br><br>Minneapolis,<br>MN<br>55402            | Electronic Service | No                | OFF_SL_21-694_21-694 |
| Ben        | Nelson      | benn@cmpasgroup.org              | CMMPA                               | 459 South Grove Street<br><br>Blue Earth,<br>MN<br>56013                 | Electronic Service | No                | OFF_SL_21-694_21-694 |
| Carl       | Nelson      | cnelson@mncee.org                | Center for Energy and Environment   | 212 3rd Ave N Ste 560<br><br>Minneapolis,<br>MN<br>55401                 | Electronic Service | No                | OFF_SL_21-694_21-694 |
| Dale       | Niezwaag    | dniezwaag@bepec.com              | Basin Electric Power Cooperative    | 1717 East Interstate Avenue<br><br>Bismarck,<br>ND<br>58503              | Electronic Service | No                | OFF_SL_21-694_21-694 |

| First Name | Last Name | Email                            | Company Name                        | Address  | Delivery Method    | View Trade Secret | Service List Name    |
|------------|-----------|----------------------------------|-------------------------------------|--|--------------------|-------------------|----------------------|
| David      | Niles     | david.niles@avantenergy.com      | Minnesota Municipal Power Agency    | 220 South Sixth Street<br>Suite 1300<br>Minneapolis,<br>Minnesota<br>55402 | Electronic Service | No                | OFF_SL_21-694_21-694 |
| Sephra     | Ninow     | sephra.ninow@energycenter.org    | Center for Sustainable Energy       | 426 17th Street, Suite 700<br><br>Oakland,<br>CA<br>94612                  | Electronic Service | No                | OFF_SL_21-694_21-694 |
| Rolf       | Nordstrom | rnordstrom@gpisd.net             | Great Plains Institute              | 2801 21ST AVE S STE 220<br><br>Minneapolis,<br>MN<br>55407-1229            | Electronic Service | No                | OFF_SL_21-694_21-694 |
| Samantha   | Norris    | samanthanorris@alliantenergy.com | Interstate Power and Light Company  | 200 1st Street SE PO Box 351<br><br>Cedar Rapids,<br>IA<br>524060351       | Electronic Service | No                | OFF_SL_21-694_21-694 |
| David      | O'Brien   | david.obrien@navigant.com        | Navigant Consulting                 | 77 South Bedford St Ste 400<br><br>Burlington,<br>MA<br>01803              | Electronic Service | No                | OFF_SL_21-694_21-694 |
| Jeff       | O'Neill   | jeff.oneill@ci.monticello.mn.us  | City of Monticello                  | 505 Walnut Street<br>Suite 1<br>Monticello,<br>Minnesota<br>55362          | Electronic Service | No                | OFF_SL_21-694_21-694 |
| Russell    | Olson     | rolson@hcpd.com                  | Heartland Consumers Power District  | PO Box 248<br><br>Madison,<br>SD<br>570420248                              | Electronic Service | No                | OFF_SL_21-694_21-694 |
| Carol A.   | Overland  | overland@legalelectric.org       | Legalelectric - Overland Law Office | 1110 West Avenue<br><br>Red Wing,<br>MN<br>55066                           | Electronic Service | No                | OFF_SL_21-694_21-694 |
| Dan        | Patry     | dpatry@sunedison.com             | SunEdison                           | 600 Clipper Drive<br><br>Belmont,<br>CA<br>94002                           | Electronic Service | No                | OFF_SL_21-694_21-694 |
|            |           |                                  |                                     |  |                    |                   |                      |

| First Name     | Last Name                      | Email                                    | Company Name                            | Address  | Delivery Method    | View Trade Secret | Service List Name    |
|----------------|--------------------------------|--|---|--|--------------------|-------------------|----------------------|
| Jeffrey C      | Paulson                        | jeff.jcplaw@comcast.net                  | Paulson Law Office, Ltd.                | 4445 W 77th Street<br>Suite 224<br>Edina,<br>MN<br>55435                     | Electronic Service | No                | OFF_SL_21-694_21-694 |
| Jennifer       | Peterson                       | jjpeterson@mnpower.com                   | Minnesota Power                         | 30 West Superior Street<br><br>Duluth,<br>MN<br>55802                        | Electronic Service | No                | OFF_SL_21-694_21-694 |
| Hannah         | Polikov                        | hpolikov@aee.net                         | Advanced Energy<br>Economy Institute    | 1000 Vermont Ave, Third<br>Floor<br><br>Washington,<br>DC<br>20005           | Electronic Service | No                | OFF_SL_21-694_21-694 |
| David G.       | Prazak                         | dprazak@otpc.com                         | Otter Tail Power Company                | P.O. Box 496<br>215 South Cascade Street<br>Fergus Falls,<br>MN<br>565380496 | Electronic Service | No                | OFF_SL_21-694_21-694 |
| Kenneth        | Rance                          | krance@sabathani.org                     | Sabathani Community<br>Center           | 310 East 38th St Rm #120<br><br>Minneapolis,<br>MN<br>55409                  | Electronic Service | No                | OFF_SL_21-694_21-694 |
| Mark           | Rathbun                        | mrathbun@grenergy.com                    | Great River Energy                      | 12300 Elm Creek Blvd<br><br>Maple Grove,<br>MN<br>55369                      | Electronic Service | No                | OFF_SL_21-694_21-694 |
| Michael        | Reinertson                     | michael.reinertson@avante<br>nergy.com   | Avant Energy                            | 220 S. Sixth St. Ste 1300<br><br>Minneapolis,<br>Minnesota<br>55402          | Electronic Service | No                | OFF_SL_21-694_21-694 |
| John C.        | Reinhardt                      | N/A                                      | Laura A. Reinhardt                      | 3552 26th Ave S<br><br>Minneapolis,<br>MN<br>55406                           | Paper Service      | No                | OFF_SL_21-694_21-694 |
| Generic Notice | Residential Utilities Division | residential.utilities@ag.stat<br>e.mn.us | Office of the Attorney<br>General-RUD   | 1400 BRM Tower<br>445 Minnesota St<br>St. Paul,<br>MN<br>551012131           | Electronic Service | Yes               | OFF_SL_21-694_21-694 |
| Kevin          | Reuther                        | kreuther@mncenter.org                    | MN Center for<br>Environmental Advocacy | 26 E Exchange St, Ste 206<br><br>St. Paul,<br>MN<br>551011667                | Electronic Service | No                | OFF_SL_21-694_21-694 |

| First Name | Last Name | Email                             | Company Name                             | Address   | Delivery Method    | View Trade Secret | Service List Name    |
|------------|-----------|-----------------------------------|--|---|--------------------|-------------------|----------------------|
| Isabel     | Ricker    | ricker@fresh-energy.org           | Fresh Energy                             | 408 Saint Peter Street<br>Suite 220<br>Saint Paul,<br>MN<br>55102 | Electronic Service | No                | OFF_SL_21-694_21-694 |
| Noah       | Roberts   | nroberts@cleanpower.org           | Energy Storage<br>Association            | 1155 15th St NW, Ste 500<br><br>Washington,<br>DC<br>20005        | Electronic Service | No                | OFF_SL_21-694_21-694 |
| Amanda     | Rome      | amanda.rome@xcelenergy.com        | Xcel Energy                              | 414 Nicollet Mall FL 5<br><br>Minneapolis,<br>MN<br>55401         | Electronic Service | No                | OFF_SL_21-694_21-694 |
| Robert K.  | Sahr      | bsahr@eastriver.coop              | East River Electric Power<br>Cooperative | P.O. Box 227<br><br>Madison,<br>SD<br>57042                       | Electronic Service | No                | OFF_SL_21-694_21-694 |
| Joseph L   | Sathe     | jsathe@kennedy-graven.com         | Kennedy & Graven,<br>Chartered           | 150 S 5th St Ste 700<br><br>Minneapolis,<br>MN<br>55402           | Electronic Service | No                | OFF_SL_21-694_21-694 |
| Thomas     | Scharff   | thomas.scharff@versoco.com        | Verso Corp                               | 600 High Street<br><br>Wisconsin Rapids,<br>WI<br>54495           | Electronic Service | No                | OFF_SL_21-694_21-694 |
| Kay        | Schraeder | kschraeder@minnkota.com           | Minnkota Power                           | 5301 32nd Ave S<br><br>Grand Forks,<br>ND<br>58201                | Electronic Service | No                | OFF_SL_21-694_21-694 |
| Christine  | Schwartz  | Regulatory.records@xcelenergy.com | Xcel Energy                              | 414 Nicollet Mall FL 7<br><br>Minneapolis,<br>MN<br>554011993     | Electronic Service | Yes               | OFF_SL_21-694_21-694 |
| Dean       | Sedgwick  | Sedgwick@ItascaPower.com          | Itasca Power Company                     | PO Box 455<br><br>Spring Lake,<br>MN<br>56680                     | Electronic Service | No                | OFF_SL_21-694_21-694 |
| Maria      | Seidler   | maria.seidler@dom.com             | Dominion Energy<br>Technology            | 120 Tredegar Street<br><br>Richmond,<br>Virginia<br>23219         | Electronic Service | No                | OFF_SL_21-694_21-694 |



| First Name | Last Name | Email                                    | Company Name                         | Address  | Delivery Method    | View Trade Secret | Service List Name    |
|------------|-----------|--|--------------------------------------|--|--------------------|-------------------|----------------------|
| Will       | Seuffert  | Will.Seuffert@state.mn.us                | Public Utilities Commission          | 121 7th PI E Ste 350<br><br>Saint Paul,<br>MN<br>55101                     | Electronic Service | Yes               | OFF_SL_21-694_21-694 |
| Patricia F | Sharkey   | psharkey@environmentalla<br>wcounsel.com | Midwest Cogeneration<br>Association. | 180 N LaSalle St<br>Ste 3700<br>Chicago,<br>IL<br>60601                    | Electronic Service | No                | OFF_SL_21-694_21-694 |
| Bria       | Shea      | bria.e.shea@xcelenergy.co<br>m           | Xcel Energy                          | 414 Nicollet Mall<br><br>Minneapolis,<br>MN<br>55401                       | Electronic Service | No                | OFF_SL_21-694_21-694 |
| Doug       | Shoemaker | dougs@charter.net                        | Minnesota Renewable<br>Energy        | 2928 5th Ave S<br><br>Minneapolis,<br>MN<br>55408                          | Electronic Service | No                | OFF_SL_21-694_21-694 |
| Anne       | Smart     | anne.smart@chargepoint.c<br>om           | ChargePoint, Inc.                    | 254 E Hacienda Ave<br><br>Campbell,<br>CA<br>95008                         | Electronic Service | No                | OFF_SL_21-694_21-694 |
| Ken        | Smith     | ken.smith@districtenergy.c<br>om         | District Energy St. Paul Inc.        | 76 W Kellogg Blvd<br><br>St. Paul,<br>MN<br>55102                          | Electronic Service | No                | OFF_SL_21-694_21-694 |
| Trevor     | Smith     | trevor.smith@avantenergy.<br>com         | Avant Energy, Inc.                   | 220 South Sixth Street<br>Suite 1300<br>Minneapolis,<br>Minnesota<br>55402 | Electronic Service | No                | OFF_SL_21-694_21-694 |
| Ken        | Smith     | ken.smith@ever-<br>greenenergy.com       | Ever Green Energy                    | 305 Saint Peter St<br><br>Saint Paul,<br>MN<br>55102                       | Electronic Service | No                | OFF_SL_21-694_21-694 |
| Joshua     | Smith     | joshua.smith@sierraclub.or<br>g          |                                      | 85 Second St FL 2<br><br>San Francisco,<br>California<br>94105             | Electronic Service | No                | OFF_SL_21-694_21-694 |
| Beth H.    | Soholt    | bsoholt@windonthewires.or<br>g           | Wind on the Wires                    | 570 Asbury Street Suite<br>201<br><br>St. Paul,<br>MN<br>55104             | Electronic Service | No                | OFF_SL_21-694_21-694 |

| First Name | Last Name        | Email                             | Company Name                   | Address  | Delivery Method    | View Trade Secret | Service List Name    |
|------------|------------------|-----------------------------------|--------------------------------|--|--------------------|-------------------|----------------------|
| Ralph J    | Solar Consulting | N/A                               | IPS Solar                      | 821 Raymond Ave<br>Ste. 400<br>St. Paul,<br>MN<br>55114                      | Paper Service      | No                | OFF_SL_21-694_21-694 |
| Sky        | Stanfield        | stanfield@smwlaw.com              | Shute, Mihaly &<br>Weinberger  | 396 Hayes Street<br><br>San Francisco,<br>CA<br>94102                        | Electronic Service | No                | OFF_SL_21-694_21-694 |
| Jamez      | Staples          | jstaples@renewablenrgpartners.com | Renewable Energy<br>Partners   | 3033 Excelsior Blvd S<br><br>Minneapolis,<br>MN<br>55416                     | Electronic Service | No                | OFF_SL_21-694_21-694 |
| Russ       | Stark            | Russ.Stark@ci.stpaul.mn.us        | City of St. Paul               | 390 City Hall<br>15 West Kellogg Boulevard<br><br>Saint Paul,<br>MN<br>55102 | Electronic Service | No                | OFF_SL_21-694_21-694 |
| Byron E.   | Starns           | byron.starns@stinson.com          | STINSON LLP                    | 50 S 6th St Ste 2600<br><br>Minneapolis,<br>MN<br>55402                      | Electronic Service | No                | OFF_SL_21-694_21-694 |
| James M    | Strommen         | jstrommen@kennedy-graven.com      | Kennedy & Graven,<br>Chartered | 150 S 5th St Ste 700<br><br>Minneapolis,<br>MN<br>55402                      | Electronic Service | No                | OFF_SL_21-694_21-694 |
| Eric       | Swanson          | eswanson@winthrop.com             | Winthrop & Weinstine           | 225 S 6th St Ste 3500<br>Capella Tower<br>Minneapolis,<br>MN<br>554024629    | Electronic Service | No                | OFF_SL_21-694_21-694 |
| Dean       | Taylor           | dtaylor@pluginamerica.org         | Plug In America                | 6380 Wilshire Blvd, Suite<br>1000<br><br>Los Angeles,<br>CA<br>90048         | Electronic Service | No                | OFF_SL_21-694_21-694 |
| Stuart     | Tommerdahl       | stommerdahl@otpc.com              | Otter Tail Power Company       | 215 S Cascade St<br>PO Box 496<br>Fergus Falls,<br>MN<br>56537               | Electronic Service | No                | OFF_SL_21-694_21-694 |
|            |                  |                                   |                                |  |                    |                   |                      |

| First Name  | Last Name | Email                                | Company Name                        | Address  | Delivery Method    | View Trade Secret | Service List Name    |
|-------------|-----------|--------------------------------------|-------------------------------------|--|--------------------|-------------------|----------------------|
| Pat         | Treseler  | pat.jcplaw@comcast.net               | Paulson Law Office LTD              | 4445 W 77th Street<br>Suite 224<br>Edina,<br>MN<br>55435                 | Electronic Service | No                | OFF_SL_21-694_21-694 |
| Curt        | Volkman   | curt@newenergy-advisors.com          | Fresh Energy                        | 408 St Peter St<br><br>Saint Paul,<br>MN<br>55102                        | Electronic Service | No                | OFF_SL_21-694_21-694 |
| Roger       | Warehime  | roger.warehime@owatonnautilities.com | Owatonna Municipal Public Utilities | 208 S Walnut Ave<br>PO BOX 800<br>Owatonna,<br>MN<br>55060               | Electronic Service | No                | OFF_SL_21-694_21-694 |
| Jenna       | Warmuth   | jwarmuth@mnpower.com                 | Minnesota Power                     | 30 W Superior St<br><br>Duluth,<br>MN<br>55802-2093                      | Electronic Service | No                | OFF_SL_21-694_21-694 |
| Samantha    | Williams  | swilliams@nrdc.org                   | Natural Resources Defense Council   | 20 N. Wacker Drive<br>Ste 1600<br>Chicago,<br>IL<br>60606                | Electronic Service | No                | OFF_SL_21-694_21-694 |
| Joseph      | Windler   | jwindler@winthrop.com                | Winthrop & Weinstine                | 225 South Sixth Street,<br>Suite 3500<br><br>Minneapolis,<br>MN<br>55402 | Electronic Service | No                | OFF_SL_21-694_21-694 |
| Robyn       | Woeste    | robynwoeste@alliantenergy.com        | Interstate Power and Light Company  | 200 First St SE<br><br>Cedar Rapids,<br>IA<br>52401                      | Electronic Service | No                | OFF_SL_21-694_21-694 |
| Yochi       | Zakai     | yzakai@smwlaw.com                    | SHUTE, MIHALY & WEINBERGER LLP      | 396 Hayes Street<br><br>San Francisco,<br>CA<br>94102                    | Electronic Service | No                | OFF_SL_21-694_21-694 |
| Christopher | Zibart    | czibart@atcllc.com                   | American Transmission Company LLC   | W234 N2000 Ridgeview<br>Pkwy Court<br><br>Waukesha,<br>WI<br>53188-1022  | Electronic Service | No                | OFF_SL_21-694_21-694 |
|             |           |                                      |                                     |  |                    |                   |                      |

| First Name | Last Name | Email                 | Company Name           | Address  | Delivery Method    | View Trade Secret | Service List Name    |
|------------|-----------|-----------------------|------------------------|--|--------------------|-------------------|----------------------|
| Kurt       | Zimmerman | kwz@ibew160.org       | Local Union #160, IBEW | 2909 Anthony Ln<br>St Anthony Village,<br>MN<br>55418-3238 | Electronic Service | No                | OFF_SL_21-694_21-694 |
| Patrick    | Zomer     | Pat.Zomer@lawmoss.com | Moss & Barnett PA      | 150 S 5th St #1200<br>Minneapolis,<br>MN<br>55402          | Electronic Service | No                | OFF_SL_21-694_21-694 |