

**STATE OF MINNESOTA
PUBLIC UTILITIES COMMISSION**

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In the Matter of a Commission Investigation to Identify and
Develop Performance Metrics, and Potentially, Incentives
for Xcel Energy's Electric Operations

Docket No. E002/CI-17-401

Initial Comments of the Citizens Utility Board of Minnesota

I. Introduction

The Citizens Utility Board of Minnesota ("CUB", "we", "our", "us") appreciates the Commission's efforts to investigate performance incentives for the electric operations of Northern States Power Company d/b/a Xcel Energy ("Xcel" or the "Company"). Much has happened in the time since CUB last participated in this docket. The COVID-19 pandemic, in particular, introduced significant anomalies in the data the Company reported for years 2020-2022. Staff turnover at CUB and other organizations has also introduced some challenges to continuity in this docket. Nevertheless, we hope these comments—which focus specifically on the identified affordability metrics—are helpful to the Commission and other parties in moving this conversation forward. While we hope to further refine our recommendations in reply comments, we offer now the following initial observations and recommendations:

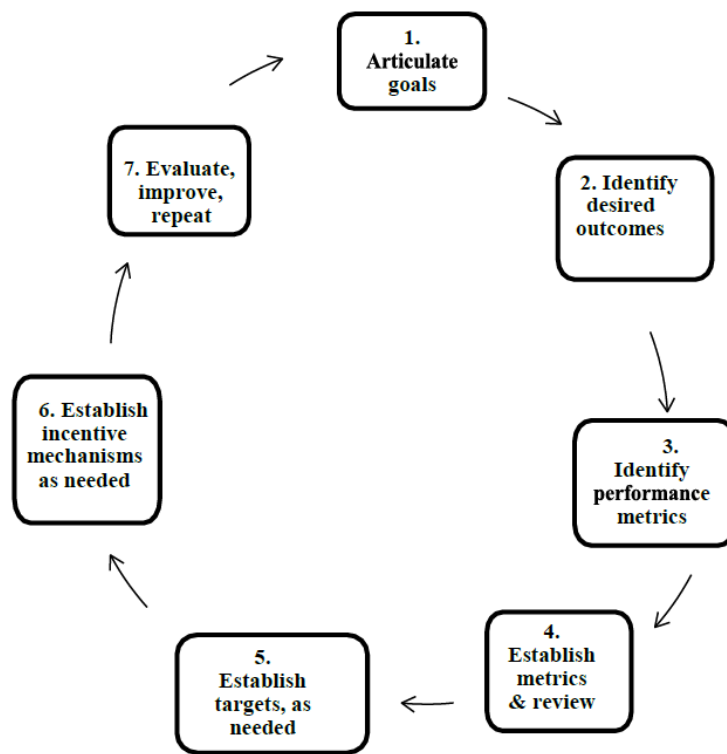
- 1) The Commission should be wary of establishing baselines or targets for some metrics when data Xcel has reported for the past three years is materially skewed by the COVID-19 pandemic.
- 2) The Commission should consider additional data reporting to provide enhanced insights into Xcel's efforts and accomplishments in helping customers avoid disconnection.
- 3) The Commission and parties should explore additional ways to utilize the interactive map Xcel has developed to develop one or more equity metrics, and/or to better incorporate equity principles into existing metrics.

II. Procedural History

There is a robust and lengthy procedural history in this docket. For ease of reference, we attached a timeline of various filings in this proceeding and other dockets that relate to and inform this comment period. (See Attachment A.) While we do not summarize the full history of these filings below, we provide below a reminder of some of the key developments in this docket to date.

A. Xcel 2017 Multi-Year Rate Plan Order

On June 12, 2017, The Commission issued an order approving Xcel's multi-year rate plan and opening the present docket to "identify and develop performance metrics and standards, and potentially incentives, to be implemented during the multi-year rate plan."¹ On September 22, 2017, the Commission issued a notice of comment period,² after which numerous parties, including CUB, submitted comments. The OAG recommended that the Commission utilize a performance incentive mechanism ("PIM") process to make high-level regulatory goals actionable by tying them to regulatory outcomes.³ The OAG also recommended that the Commission adopt the following framework for further developing performance metrics and incentives (the "Goals-Outcomes-Metrics hierarchy").⁴



¹ *In the Matter of the Application of Northern States Power for Authority to Increase Rates for Electric Service in the State of Minnesota*. Findings of Fact, Conclusions, and Order. Docket E-002/GR-15-826, June 12, 2017 (hereinafter "Xcel 2017 Rate Case Order").

² *In the Matter of a Commission Investigation to Identify and Develop Performance Metrics and, Potentially, Incentives for Xcel Energy's Electric Utility Operations*, Notice of Comment Period, Docket No. E-002/CI-17-401 (Sept. 22, 2017).

³ *In the Matter of a Commission Investigation to Identify and Develop Performance Metrics and, Potentially, Incentives for Xcel Energy's Electric Utility Operations*, OAG Initial Comments, Docket No. E-002/CI-17-401 (Dec. 21, 2017).

⁴ *Id.* at 17.

B. Order Establishing Performance Incentive Mechanism Process

In a January 2019 Order (the "Order Establishing PIM Process"), the Commission adopted "the OAG's Performance Incentive Mechanism Process and associated Goals-Outcomes-Metrics hierarchy (included above), with an initial focus on steps 1 through 4."⁵ Consistent with this, the Commission also identified specific goals, desired outcomes, and metric design principles that would move the discussion forward in this docket. For ease of reference, the relevant language from the Commission's January 2019 is reproduced here:

1. Goals:

- The goals in overseeing the rates, investments, and returns made by the investor-owned utilities in Minnesota are to promote the public interest by ensuring environmental protection; adequate, efficient, and reasonable service; reasonable rates; and the opportunity for regulated entities to receive a fair and reasonable return on their investments.

2. Outcomes (related to three categories: customer focus, utility performance, and public policy):

- Affordability;
- Reliability, including both customer and system-wide perspectives
- Customer service quality, including satisfaction, engagement and empowerment;
- Environmental performance, including carbon reductions and beneficial electrification; and
- Cost effective alignment of generation and load, including demand response.

3. Metric Design Principles:

- Tied to the policy goal. A metric should clearly reflect whether or not the underlying policy goal is being met. That is, it should seek and evaluate data that is specifically tied to the particular policy goal underlying the metric.
- Clearly defined. The method of calculating a metric should be precise and unambiguous to enable meaningful comparisons and to reduce potential disputes.
- Able to be quantified using reasonably available data. Using already reported data or data that is readily available will reduce administrative burden and the costs associated with implementing the metric.
- Sufficiently objective and free from external influences. Metrics should seek to measure behaviors that are within a utility's control and free from exogenous influences, such as weather or market forces.
- Easily interpreted. Metrics should exclude the effects of factors outside a utility's control so they provide a better understanding of utility performance and should use

⁵ *In the Matter of a Commission Investigation to Identify and Develop Performance Metrics, and Potentially, Incentives for Xcel Energy's Electric Utility Operations*, Order Establishing Performance-Incentive Mechanism Process, Docket No. E-002/CI-17-401 (Jan. 8, 2019) (hereinafter "Order Establishing PIM Process").

measurement units that facilitate comparisons across time and utilities (i.e., "per kWh" or "per customer").

- Easily verified. Straight-forward data collection and analysis techniques should be used, and independent third-party evaluators can further ensure accurate verification with respect to performance metrics.
- Should complement and inform evaluation of utility performance. Performance metric systems should be designed to complement – not replace – other parts of a utility's regulatory system such as multi-year rate plans and cost trackers.

C. Order Establishing Performance Metrics

On September 18, 2019, the Commission issued an Order Establishing Performance Metrics (the "Order Establishing Performance Metrics") that established performance metrics around the following five categories:⁶

1. Affordability
2. Reliability
3. Customer service quality
4. Environmental performance
5. Cost-effective alignment of generation and load

The Commission also ordered Xcel: (1) to work with interested parties "to develop proposed specific methods to calculate (to the extent not already developed), verify, and report each of the metrics" outlined above; (2) to work with stakeholders on the development of a future metric to measure workforce and community development impact; and (3) to file a description of the "corresponding methodology underlying each of the metrics outlined above, and a proposed process schedule for reporting the metrics."⁷

D. Order Establishing Methodologies and Reporting Schedules

On April 16, 2020, the Commission issued its Order Establishing Methodologies and Reporting Schedules in the present docket.⁸ In this order, the Commission again ordered Xcel to work with stakeholders to: (1) "explore and develop options to employ an online utility performance dashboard and present those options to the Commission in the first annual report, including a fair discussion of the costs involved" and (2) "to develop evaluation criteria and benchmarks and file them at a later date."⁹

⁶ Order Establishing Performance Metrics at 12-13.

⁷ Order Establishing Performance Metrics at 13-14.

⁸ *In the Matter of a Commission Investigation to Identify and Develop Performance Metrics, and Potentially, Incentives for Xcel Energy's Electric Utility Operations*, Order Establishing Performance-Incentive Mechanism Process, Docket No. E-002/CI-17-401 (April 16, 2020), p. 2 (hereinafter "Order Establishing Methodologies and Reporting Schedules").

⁹ *Id.* at 10.

E. Order Accepting 2020 Report and Setting Additional Requirements

On April 30, 2021, Xcel filed its first annual performance-based ratemaking report on 28 metrics tracked during 2020. In a subsequent order, the Commission accepted Xcel's report and set additional requirements ("Order Accepting 2020 Report and Setting Additional Requirements").¹⁰ For ease of reference, the additional requirements established in this Order are reproduced below:

1. Xcel must provide contextual data — either by providing the same data for the previous three years or, where applicable, an established industry standard or state policy goal — for each of the approved performance metrics in future annual performance metric reports.
2. Xcel must display low-income energy efficiency program participation on a map, overlaid with a map of ACPs in Xcel's Minnesota territory in its future annual service quality performance reports.
3. Xcel must display energy bill assistance program participation on a map, overlaid with a map of ACPs in Xcel Energy's Minnesota territory in its future annual service quality performance reports.
4. Xcel must provide three years of data before developing evaluation and benchmarking targets for the performance metric.
5. Xcel must include in its PBR annual reports information on: availability of data specific to its gas suppliers on upstream methane emissions; regulation of methane emissions upstream of the Company's distribution system, and the Company's position on such regulations; participation in voluntary initiatives to quantify and reduce methane from gas suppliers; any certified gas purchases; pilots with gas marketers to track and source gas with lower associated methane emissions; and any other actions the Company has taken to secure data on and/or reduce upstream methane emissions. No later than 2024, the Company will re-evaluate data available on upstream methane to consider feasibility of reporting of methane emissions attributable to total natural gas purchases across the full fuel cycle (from drilling and extraction to the end-use).
6. Xcel must include in its report, once the Commission has determined adequate data on upstream methane is available to support utility-specific reporting of such emissions, methane emissions across the full fuel cycle in its calculation of greenhouse gas emissions avoided by electrification of buildings, agriculture, and other sectors.
7. Xcel must host one or more stakeholder meetings for stakeholders to ask questions and provide feedback on the proposed scorecard.
8. The Commission adopts the Workforce Transition metric; Xcel must obtain additional stakeholder feedback on the plan as it is developed for the 2021 annual performance metrics report.

¹⁰ *In the Matter of a Commission Investigation to Identify and Develop Performance Metrics, and Potentially, Incentives for Xcel Energy's Electric Utility Operations*, Order Accepting 2020 Report and Setting Additional Metrics, Docket No. E-002/CI-17-401 (Feb. 9, 2022), p. 2 (hereinafter "Order Accepting 2020 Report and Setting Additional Requirements").

F. May 26, 2023 Notice for Comment

Finally, on May 26, 2023, the Commission issued a notice for comment on the following topics:

1. Should the Commission accept Xcel's 2021 & 2022 PBR Annual Reports? Do Xcel's reports address the requirements set forth by Commission Orders in this docket, including but not limited to:
 - Future metrics?
 - Development of an online utility performance dashboard?
 - Data collection on and/or reductions in upstream methane emissions?
2. From the three years of data that have been filed for each metric, how should a single baseline value be calculated? Please explain your reasoning and provide calculations of the baseline for each metric.
3. For which metrics, if any, should the Commission set targets and why?
4. Where applicable, by what methodology should targets be set? How often should targets be reviewed and potentially updated?
5. Where applicable, what are appropriate targets for the metrics?
6. What action should the Commission take on reporting the Company's Workforce Transition Plan in docket no. E002/M-22-265 rather than the instant docket?
7. How should the Commission evaluate the metrics that do not yet have three years of baseline data?
8. Are there other issues or concerns related to this matter?

III. Analysis

Consistent with the Commission's Order Establishing Performance Incentive Mechanism Process, metrics should be tied to the policy goal, clearly defined, able to be quantified using reasonably available data, sufficiently objective and free from external influences, easily interpreted, easily verified, and should complement and inform the evaluation of utility performance. While we are hopeful these principles can be met for the metrics proposed, we see some challenges in quantifying baselines and targets (at least at this time) for the affordability metrics previously established in this docket.

1. Data on disconnections and arrearages included in the 2020, 2021, and 2022 reports are skewed by the COVID-19 pandemic and related actions.

On March 25, 2020, the Minnesota Commissioner of Commerce and Chair Sieben sent a letter (the "Joint Letter")¹¹ to all of Minnesota's electric and gas utilities asking them to voluntarily take certain actions—including suspending disconnections—for the duration of the COVID-19 peacetime emergency. The next day, Xcel filed a letter confirming they would undertake (and/or had already undertaken) the actions identified in the Joint Letter.¹² On August 13, 2020, the Commission issued an order that, amongst other things, required regulated utilities to "suspend disconnections for residential customers for the duration of [Governor Walz's] peacetime emergency" and "waive reconnection, service deposits, late fees, interest, and penalties for residential customers for the duration of the peacetime emergency."¹³ On May 26, 2021, the Commission issued an order adopting a transition plan for resuming disconnections once the peacetime emergency ended.¹⁴ (Governor Walz ended the peacetime emergency on July 1, 2021.¹⁵) Through that Order, the Commission permitted Minnesota utilities to resume sending disconnection notices as of June 1, 2021, and to resume service disconnections as of August 2, 2021.¹⁶ However, the Commission prohibited disconnection of customers with past due balances who had a pending application or been deemed eligible for LIHEAP assistance—or who had pending RentHelp applications—until April 30, 2022.¹⁷

CUB appreciates and supports both Xcel's and the Commission's efforts to suspend disconnections during this challenging period. That being said, these actions contribute (along with other anomalous circumstances arising during the pandemic) to Xcel's data for 2020, 2021, and 2022 being non-representative of more typical years. Specifically, the number of annual disconnections reported during this period likely skews lower than a typical year. Relatedly, annual arrearage totals in 2020, 2021 and 2022 skew higher than average due to arrearages accumulating when disconnections were suspended. For these reasons alone, it is difficult to establish appropriate baselines or targets for future arrearage and disconnection rates based on the data presented in Xcel's most recent reports.

Though Xcel was only required to file three years of PBR reports, it has now provided six years' worth of data. Reviewing this broader data set may reduce some of the concerns described above, but we question whether data from years prior to 2020 remains representative of a typical year moving

¹¹ *In re: Responsive Measures to the Outbreak of COVID-19*, Letter to Minnesota Electric and Gas Utilities, Minn. Docket 20-375 (March 25, 2020).

¹² *In re: Responsive Measures to the Outbreak of COVID-19*, Xcel Letter, Minn. Docket 20-375 (March 26, 2020).

¹³ *In the Matter of an Inquiry into Actions by Electric and Natural Gas Utilities in Light of the COVID-19 Pandemic Emergency*, Order Establishing Peacetime Emergency Requirements and Modifying Reporting Requirements, Docket No. E, G-999/CI-20-375 (Aug. 13, 2020) (hereinafter "Order Establishing Peacetime Emergency Requirements").

¹⁴ *In the Matter of an Inquiry into Actions by Electric and Natural Gas Utilities in Light of the COVID-19 Pandemic Emergency*, Order Adopting Broad Transition Plan Proposal, Suspending Negative Reporting, and Establishing Notice and Communication Requirements, Docket No. E, G-999/CI-20-375 (May 26, 2021) (hereinafter "Order Adopting Transition Plan").

¹⁵ See, e.g., Diane Sandberg & John Croman, "Governor Tim Walz to end emergency powers July 1", *Kare11* (June 31, 2021), available at <https://www.kare11.com/article/news/politics/walz-emergency-powers-to-end-july-1-minnesota-governor/89-0e39c940-f149-4031-88fb-8b175ee0ce45>.

¹⁶ Order Adopting Transition Plan at Order Point 4.

¹⁷ Order Adopting Transition Plan at Order Point 4; see also *In the Matter of an Inquiry into Actions by Electric and Natural Gas Utilities in Light of the COVID-19 Pandemic Emergency*, Order Temporarily Suspending Disconnections, With Conditions, to RentHelpMN Applicants, Docket No. E, G-999/CI-20-375 (Nov. 9, 2021).

forward. Setting targets and baselines based on this historic data may not adequately capture changes that have occurred since 2020.

2. The number of disconnections and aggregate arrearage totals may change depending on how Xcel offers and manages customer payment plans.

It is CUB's understanding (informed by anecdotal communications with residential consumers across the state) that Xcel has, at times, been more flexible and accommodating than some other utilities in setting up and maintaining customer payment plans.¹⁸ Being reasonably accommodating to customers when establishing payment plans is, we believe, consistent with the public policy goal of making energy rates affordable and with Minn. Stat. § 216B.098 subd 3, which requires utilities to offer payment arrangements that "consider a customer's financial circumstances and any extenuating circumstances of the household."

If Xcel, indeed, is more accommodating than other utilities in establishing payment plans, Xcel's aggregate arrearage totals may appear higher than those of other, less accommodating utilities. We are concerned that setting a baseline or target that would incentivize Xcel to lower its aggregate arrearage amount may cause Xcel to be less accommodating to customers when establishing payment plans moving forward. (In other words, Xcel may be pushed to insist on less affordable payment plans and/or may be quicker to threaten or effectuate disconnections in order to prevent customers from getting too far behind on their bills.) This, in our view, could be a negative result that is incompatible with the policy goal of promoting affordability. It may be preferable from a public policy perspective for Xcel and the Commission to tolerate relatively higher aggregate arrearage amounts from customers on payment plans if doing so can better help customers afford their bills and avoid disconnection.

3. We recommend that Xcel report additional data relating to the effectiveness of payment plan arrangements.

With this in mind, it would be helpful to consider a few additional data points that would provide insight into Xcel's efforts to promote affordability through reasonable payment plans. Such data could include:

- The number of customers (and the percentage of all residential customers) who were under one or more payment plans during the reporting period;
- The percentage of payment plans that ended in a default that then prompted a disconnection; and
- The average percent reduction in arrears per customer participating in a payment plan during the reporting period.

We thank Xcel for discussing the above concepts with us prior to the submission of these comments. From those discussions, it is our understanding that Xcel has some ability to track and report on this data (though we welcome Xcel to clarify whether that is the case in reply comments). We recognize these data points, too, have their shortcomings. Namely, Xcel cannot control customer behavior; no

¹⁸ To be clear, we have also heard from some Minnesotans who have had negative experiences establishing payment plans with Xcel.

matter how accommodating the Company is in establishing payment plans, not all customers will meet their payment obligations and may experience disconnection as a result. We also recognize Xcel cannot control broad economic factors that play a role in customers' ability to pay their utility bills. Nevertheless, Xcel will presumably see better compliance with payment arrangements if the payments required of customers are affordable. We believe it is worth exploring whether this data could provide additional insights into the affordability metrics the Commission previously authorized. Tracking this data could also inform the setting of baselines and targets in the future.

4. The Commission and parties should explore additional ways to utilize the interactive map Xcel has developed to develop one or more equity metrics, and/or to better incorporate equity principles into existing metrics.

We applaud Xcel for the work they have done to establish the interactive map contemplated in this docket. We believe this is a useful resource that will help Xcel, the Commission, and other parties assess and think about how principles of equity and energy justice can be considered in this and other dockets. That said, we are hopeful that these interactive maps can be better utilized to inform existing metrics and/or more proactively develop new metrics or reporting requirements to ensure equity is considered in the context of performance-based ratemaking. We look forward to responding to ideas raised by other parties on this subject, as well as to further reporting Xcel will file in response to the Commission's recent order cross-filed in this docket and Docket 20-406.¹⁹ (In that Order, the Commission required Xcel conduct "an analysis that examines whether there is a relationship between poor performance on the five identified metrics displayed on the interactive map and equity indicators [and to] file this analysis with its next service quality report due April 1, 2024.")²⁰ We look forward to reviewing Xcel's analysis in April 2024.

IV. Conclusion

CUB again appreciates the opportunity to contribute to this conversation. CUB looks forward to working with the Commission and stakeholders to further assess, develop, and refine performance-based regulation in Minnesota. Although this docket has been open for some time, we believe the highly unusual circumstances of the previous three years makes it difficult to establish benchmarks and targets—at least when it comes to affordability—at this time. We look forward to reading other parties' observations and recommendations raised in initial comments, and to reacting to them further in our reply comments. In the meantime, we offer the following observations and recommendations:

- 1) The Commission should be wary of establishing baselines or targets for some metrics when data Xcel has reported for the past three years is materially skewed by the COVID-19 pandemic.
- 2) The Commission should consider additional data reporting to provide enhanced insights into Xcel's efforts and accomplishments in helping customers avoid disconnection.

¹⁹ *In the Matter of Xcel Energy's Annual Report on Safety, Reliability, and Service Quality and Petition for Approval of Electric Reliability Standards*, Order, Docket No. E-002/M-20-406 (May 18, 2023).

²⁰ *Id.*

- 3) The Commission and parties should explore additional ways to utilize the interactive map Xcel has developed to develop one or more equity metrics, and/or to better incorporate equity principles into existing metrics.

We appreciate the Commission's consideration of these comments.

Respectfully submitted,

July 31, 2023

/s/ Brian Edstrom

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Timeline of Docket 17-401 and related dockets

Party	Docket	Date	Filing
PUC	02-1436	Oct. 22, 2002	Investigation – Xcel's service quality
PUC	02-2034	March 10, 2004	Order accepting Settlement Agreement- QSP standards and annual reporting requirement; underperformance payments
PUC	02-2034	Aug. 12, 2013	Order approving amendments to QSP tariff
Xcel	02-2034	Aug. 12, 2013	Xcel Service Quality Tariff
PUC	15-826	June 12, 2017	Xcel 2017 Rate Case Order
PUC	17-401	Jan. 8, 2019	Order Establishing PIM Process
PUC	17-401	Sept. 19, 2019	Order Establishing Performance Metrics
Xcel	17-401	Oct. 31, 2019	Proposed methodologies and process schedule
PUC	20-406	Dec. 18, 2020	Order Accepting Reports, Requiring Additional Filings and Establishing Workshop
PUC	19-261	Jan. 28, 2020	Order Accepting Reports, Establishing Reliability Standards, and Requiring Additional Filings
PUC	17-401	Feb. 9, 2022	Order Accepting Report and Setting Additional Requirement
PUC	17-401	April 16, 2020	Order Establishing Methodologies and Reporting Schedules
Xcel	17-401	Oct. 26, 2022	Compliance Filing – Proposed Demand Response Interactive Mechanism
Xcel	17-401	Apr. 30, 2021	Xcel 2020 PBR Report
PUC	17-401		Order Accepting 2020 Report and Setting Additional Requirements
Xcel	17-401	Oct. 1, 2021	Compliance Filing – Interactive Map Update
Xcel	17-401	Dec. 15, 2021	Letter – Interactive Map Update
Xcel	17-401	April 14, 2022	Compliance Filing – Load Flexibility Peak flex Credit
Xcel	17-401	April 14, 2022	Compliance Filing – Load Flexibility EV Optimization
Xcel	17-401	April 29, 2022	2022 Performance Metrics Incentives Annual Report
PUC	17-401	March 15, 2022	Order Approving Modified Load-Flexibility Pilots and Demonstration Projects, Authorizing Deferred Accounting, and Taking Other Action
Xcel	17-401	May 27, 2022	Compliance Filing – Peak Flex Credit
PUC	17-401	Sept. 12, 2022	Order accepting May 27, 2022 Xcel filing and requiring additional compliance filing
Xcel	17-401	Sept. 19, 2022	Compliance Filing – Tariff revisions PFC and ETS Pilots
Xcel	17-401	Feb. 1, 2023	Compliance Filing – Demand Response
Xcel	17-401	April 28, 2023	2022 Performance Metrics Incentives Annual Report
PUC	17-401	May 18, 2023	Order Accepting Metrics Displayed on Interactive Map
Xcel	17-401	July 11, 2023	Errata to 2022 PMI Annual Report

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David	Dahlberg	davedahlberg@nweco.com	Northwestern Wisconsin Electric Company	P.O. Box 9 104 South Pine Street Grantsburg, WI 548400009	Electronic Service	No	OFF_SL_17-401_Official
John	Farrell	jfarrell@ilsr.org	Institute for Local Self-Reliance	2720 E. 22nd St Institute for Local Self-Reliance Minneapolis, MN 55406	Electronic Service	No	OFF_SL_17-401_Official
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 551012198	Electronic Service	No	OFF_SL_17-401_Official
Katherine	Hamilton	katherine@aem-alliance.org	Advanced Energy Management Alliance	1701 Rhode Island Ave, NW Washington, DC 20036	Electronic Service	No	OFF_SL_17-401_Official
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Audrey	Partridge	apartridge@mncee.org	Center for Energy and Environment	212 3rd Ave. N. Suite 560 Minneapolis, Minnesota 55401	Electronic Service	No	OFF_SL_17-401_Official
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_17-401_Official
Isabel	Ricker	ricker@fresh-energy.org	Fresh Energy	408 Saint Peter Street Suite 220 Saint Paul, MN 55102	Electronic Service	No	OFF_SL_17-401_Official
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Patricia F	Sharkey	psharkey@environmentalallawcounsel.com	Midwest Cogeneration Association.	180 N LaSalle St Ste 3700 Chicago, IL 60601	Electronic Service	No	OFF_SL_17-401_Official

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Jeff	Zethmayr	jzethmayr@citizensutilityboard.org	Citizens Utility Board	309 W. Washington, Ste 800 Chicago, IL 60606	Electronic Service	No	OFF_SL_17-401_Official