COMMERCE DEPARTMENT

September 9, 2025

Mike Bull
Interim Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, Minnesota 55101-2147

RE: Comments of the Minnesota Department of Commerce
Docket Nos. G002/M-23-518 and G999/CI-21-566

Dear Mr. Bull:

Attached are the supplemental comments of the Minnesota Department of Commerce (Department) in the following matter:

In the Matter of Xcel Energy's Natural Gas Innovation Plan

The Compliance filings was submitted by Xcel Energy on June 16, 2025.

The Department **supports the OAG's recommendations with modifications** and is available to answer any questions the Minnesota Public Utilities Commission may have.

Sincerely,

/s/ Dr. SYDNIE LIEB
Assistant Commissioner of Regulatory Analysis

MZ/ad
Attachment

Before the Minnesota Public Utilities Commission

Comments of the Minnesota Department of Commerce

Docket Nos. G002/M-23-518 and G999/CI-21-566

I. INTRODUCTION

On July 16, 2025, Northern States Power Company d/b/a Xcel Energy (Xcel or the Company) filed a compliance filing[1] with the Minnesota Public Utilities Commission (Commission) related to New Pilots for its Natural Gas Innovation Plan (NGIP) as required by the Commission's May 16, 2025 *Order Approving Natural Gas Innovation Plan with Modifications*.[2] In response to a June 26, 2025 Commission Notice of Negative Check-Off Period[3] the Office of the Attorney General – Residential Utilities Division (OAG) submitted comments objecting to Xcel's compliance filing on August 15, 2025.[4] On August 21, 2025 the Commission issued a Notice of Comment Period requesting comments on whether the Commission should allow Xcel to proceed with its Sherco 5 MW hydrogen pilot by September 9, 2025.[5]

II. PROCEDURAL BACKGROUND

May 16, 2025	The Commission issued its *Order Approving Natural Gas Innovation Plan with Modifications.*[6] The NGIA Order required multiple compliance filings.
July 16, 2025	Xcel filed a compliance filing related to risk mitigation for the Sherco 5MW Hydrogen Pilot.[7]
June 26, 2025	The Commission issued a Notice of Negative Check-Off Period requesting any objections to Xcel's proposed compliance item by August 15, 2025.[8]
August 15, 2025	The OAG submitted comments objecting to Xcel's compliance filing.[9]

[1] *In the Matter of Xcel Energy's Natural Gas Innovation Plan*, Xcel Energy, Compliance – Order Point 6, July 16, 2025, Docket No. G-002/M-23-518, (eDockets) 20256-219933-01, (hereinafter "Pilot Compliance Filing").
[2] *Order Approving Natural Gas Innovation Plan with Modifications*, May 16, 2025, Docket No. G-002/M-23-518, (eDockets) 20255-2190616-01, (hereinafter "NGIA Order").
[3] *Notice of Negative Check-Off Period*, June 26, 2025, Docket No. G-002/M-23-518, (eDockets) 20256-220287-01, (hereinafter "Negative Checkoff Notice").
[4] Office of the Attorney General – Residential Utilities Division, Objection and Comments, August 15, 2025, Docket No. G-002/M-23-518, (eDockets) 20258-222161-02, (hereinafter "OAG Objection").
[5] *Notice of Comment Period*, August 21, 2025, Docket No. G-002/M-23-518, (eDockets) 20258-222285-01, (hereinafter "Notice of Comment Period").
[6] NGIA Order.
[7] Pilot Compliance Filing.
[8] Negative Checkoff Notice.
[9] OAG Objection

August 21, 2025	The Commission issued a Notice of Comment Period requesting comments on whether the Commission should allow Xcel to proceed with its Sherco 5 MW hydrogen pilot by September 9, 2025.[10]

Topic(s) open for comment:

- Should the Commission allow Xcel to proceed with its Sherco 5MW hydrogen pilot ahead of its final decision in Docket No. G-002/M-25-259?
- What actions, if any, should the Commission take in response to the objections raised by OAG in its August 15, 2025 comments regarding Xcel's:
  - explanation detailing the steps it has taken and will take to mitigate the risk of a stranded asset for its Sherco 5MW hydrogen pilot; and
  - how it would manage cost recovery for this asset if the industrial customer were to withdraw before Xcel had fully recovered the asset's costs?
- Are there other issues or concerns related to this matter?

The Department provides comments below in response to the Commission Notice of Comment Period.

III. DEPARTMENT ANALYSIS

The Department provide a brief summary of Xcel's compliance filing, a summary of the issues raised by the OAG, and the Department's analysis and recommendations.

A. XCEL PILOT COMPLIANCE FILING

Xcel's Pilot Compliance Filing was made in response to Order Point 6 of the Commission's NGIA Order which required the Company to file:

> Within 30 days, Xcel must file an explanation detailing the steps it has taken and will take to mitigate the risk of a stranded asset for its Sherco 5MW pilot, and how it would propose to manage cost recovery for this asset if the industrial customer were to withdraw before Xcel had fully recovered the asset's costs.[11]

This issue stemmed from the fact that the Sherco 5MW Hydrogen Pilot will provide hydrogen to fuel a boiler that provides steam that will serve only one customer after Sherco Units 1 and 2 close in 2026. The pilot requires the use of a new electrolyzer that has an assumed useful life of 20 years, and the steam customer is only under contract through 2035, or 10 years from now.[12] Additionally, it is possible that this customer could end service early for a variety of reasons.

[10] Notice of Comment Period.
[11] NGIA Order at 27.
[12] Pilot Compliance Filing at 3.

In response to Order Point 6, the Company submitted several potential risk mitigation factors in its Pilot Compliance Filing. The first is the potential continued use of the boiler for heating the facility replacing the Sherco coal generator. The Sherco facility is being replaced with a clean energy hub, which the Company states would still require heating service and could make use of the boiler. Second, the Company states that the boiler could provide service to potential new customers of a new adjacent industrial development area. Finally, the Company states that, if necessary, the Company could transport the electrolyzer to another location to support other Company and/or customer needs, as the 5 MW electrolyzer will be housed within two movable 40-foot containers. The Company also states that, "[i]n the unlikely event that there is no use for the electrolyzer at Sherco or anywhere else on the Company's system before the end of its useful life, the Company will pursue cost recovery for any outstanding plant balance that remains."[13]

B. OAG OBJECTION SUMMARY

The OAG submitted an objection to the compliance filing on the grounds that Xcel's risk mitigation compliance filings show continued stranded-asset risks or the risk of additional costs to prevent the stranding of the asset.[14] The OAG notes that Xcel does not provide any information on building use following the closure of the Sherco coal units and those buildings already receive heating steam service, so would not make up for the loss of the Company's other customer. Therefore, the continued use of steam by the Sherco facilities is unlikely to justify or fully utilize the boiler.[15]

Regarding Xcel's other risk mitigation proposals, the OAG notes that connecting to new industrial customers or transporting the electrolyzer for another location would both likely incur significant costs that Xcel would almost likely seek to pass on to ratepayers. OAG states that Xcel shareholders should absorb the potential additional costs if incurred.[16]

Finally, the OAG also provides a discussion of Xcel's ongoing affiliated interest agreement with the customer of the steam service. However, the Commission's Notice of Comment Period notes that that matter is under discussion in a separate docket.[17] The OAG's comments noted that in the affiliated interest agreement docket Xcel filed its previous agreement with no changes. This filing met the word of the Commission's Order which required "Xcel must file an affiliated interest arrangement in a new docket" but did not meet the spirit of the request by other parties to have Xcel update its affiliated interest agreement.[18] As a result Xcel's filing in the affiliated interest docket does not add any ratepayer protection or solve any of these outstanding stranded asset risks that parties were concerned of for the Sherco 5 MW Hydrogen Pilot. As these two dockets are intrinsically linked, it is necessary to consider the other in the present docket. Since the Company does not propose changes to the affiliated interest agreement, the OAG recommends specific changes to the pilot.

[13] Pilot Compliance Filing at 3-5.
[14] OAG Objection at 4.
[15] OAG Objection at 4-5.
[16] OAG Objection at 5.
[17] Notice of Comment Period.
[18] NGIA Order at 27.

The OAG made the following recommendations:

> (1) Xcel's shareholders will bear all risks of any stranded capital costs and return should the Sherco 5MW facility become no longer used and useful;
>
> (2) Xcel's shareholders will bear all costs of any plant additions or other costs necessary to provide hydrogen to another off-taker; and,
>
> (3) Xcel's shareholders will bear all costs necessary to decommission, transport, and reconnect the electrolyzer if it becomes necessary to do so before the end of the electrolyzer's useful life.[19]

Additionally, the OAG recommended that, if the Commission does not impose these requirements, then the Company should not be allowed to recover the costs for the pilot from residential and small commercial customers so as to be consistent with the Commission's NGIA Order.[20]

C. DEPARTMENT RESPONSE

The Department reviewed the OAG's concerns and concurs that there are legitimate issues with Xcel's Pilot Compliance Filing, especially if the Company proposes no changes in the affiliated interest filing. The OAG identified issues with each of Xcel's stated ways to mitigate the stranded asset risks. The Department does note, however, that the in the case of obtaining new customers for the pilot in the adjacent industrial area the Company could build in the costs of connecting those customers into the contract with that customer. As steam service is unregulated for the Company, it would be absurd for the Company to bill costs to ratepayers for connecting new steam service customers. The Department requests that Xcel clarify how it would treat the costs of connecting new steam customers to the boiler. However, the Company obtaining another steam customer is not only speculative, but any gap in service is also unknown and unknowable; this risk burdens Xcel ratepayers.

The Company also stated that it could continue to heat the buildings from the Sherco facility that will remain in use as part of the transformation into a clean energy hub. As the OAG points out, the Company does not include any information on what buildings will remain in use and what level of service this might require. It is unclear if this service level would be enough to provide the Company with enough information for its pilot to produce useful results. The Department requests the Company explain what energy usage it expects from the Sherco 3 facilities and if that level of usage would be able to produce sufficient learnings for the pilot project.

Xcel also stated that it could relocate the boiler, but the OAG pointed out that this relocation would certainly incur additional costs. As the pilot project is directly recovered through the NGIA and relocation of the electrolyzer would likely be done to continue the pilot, it is likely that Xcel would attempt to pass these costs on to ratepayers. The Department agrees with the OAG that this strategy

[19] OAG Objection at 10.
[20] Id.

places the risk of the pilot on ratepayers, when it was the Company's decision to place this pilot in the inherently risky location where the loss of a single customer might greatly impact the pilot project.

Finally, the Company stated that in the case that the asset does become stranded, it will attempt to recover its costs from ratepayers.[21] In other words Xcel proposes a pilot that could be in jeopardy with the loss of a single customer, the loss of which would either greatly reduce the data created or result in the pilot incurring additional costs to continue; the alternative in this scenario is a complete loss for ratepayers. While the Company seems confident that the current steam customer will not be lost, this future is not knowable, as it is up to market whims and could change suddenly. The Company's filing incompletely addresses this risk.

The Department initially supported the Sherco 5 MW hydrogen pilot with the condition of the affiliated interest agreement's reassessment to address the risks of the project.[22] As such, the outcome of the affiliated interest agreement docket[23] impacts this matter directly. For these reasons the Department supports the OAG's recommendations 1 through 3 from the OAG's Objection filing, but modified so that the second recommendation states:

> (2) Xcel's shareholders will bear all costs of any plant additions or other costs necessary to provide hydrogen to another off-taker or those costs be factored into the cost of service for the new customer, such that ratepayers incur no additional costs;

If the Commission does not adopt these recommendations, the Department also supports requiring that the Company not be allowed to recover the costs for the pilot from residential and small commercial customers class to be consistent with the Commission's NGIA Order.[24]

IV. DEPARTMENT RECOMMENDATIONS

Based on analysis of the Department and the information in the record, the Department has prepared recommendations, which are provided below. The recommendations correspond to the subheadings of Section III above.

C. DEPARTMENT RESPONSE

- C.1. The Department requests that Xcel clarify how it would treat the costs of connecting new steam customers to the boiler.
- C.2. The Department requests the Company explain what energy usage it expects from the Sherco 3 facilities and if that level of usage would be able to produce sufficient learnings for the pilot project.

[21] Pilot Compliance Filing at 3-5.
[22] In the Matter of Xcel Energy's Natural Gas Innovation Plan, Department, Letter, November 7, 2024, Docket Nos. G-002/M-23-518 and G999/CI-21-566, (eDockets) 202411-211721-01.
[23] Docket No. G-002/AI-25-259
[24] NGIA Order at 27.

- C.3. The Department supports the OAG's recommendations 1 through 3 from the OAG's Objection filing, but edited so that the second recommendation states:

  > (2) Xcel's shareholders will bear all costs of any plant additions or other costs necessary to provide hydrogen to another off-taker or those costs be factored into the cost of service for the new customer, such that ratepayers incur no additional costs;

- C.4. If the Commission does not adopt these recommendations, the Department also supports requiring that the Company not be allowed to recover the costs for the pilot from residential and small commercial customers class to be consistent with the Commission's NGIA Order.

Attachments

CERTIFICATE OF SERVICE

I, Sharon Ferguson, hereby certify that I have this day, served copies of the following document on the attached list of persons by electronic filing, certified mail, e-mail, or by depositing a true and correct copy thereof properly enveloped with postage paid in the United States Mail at St. Paul, Minnesota.

Minnesota Department of Commerce
Supplemental Comments

Docket No. G002/M-23-518 and G999/CI-21-566

Dated this **9th** day of **September 2025**

/s/Sharon Ferguson

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79	Linda	Martinez	lmartinez@auri.org	Agricultural Utilization Research Institute		null null, null United States	Electronic Service		No	21-566Official
80	Mary	Martinka	mary.a.martinka@xcelenergy.com	Xcel Energy Inc		414 Nicollet Mall 7th Floor Minneapolis MN, 55401 United States	Electronic Service		No	21-566Official
81	Daryl	Maxwell	dmaxwell@hydro.mb.ca	Manitoba Hydro		360 Portage Ave FL 16 PO Box 815, Station Main Winnipeg MB, R3C 2P4 Canada	Electronic Service		No	21-566Official
82	Taylor	McNair	taylor@gridlab.org			668 Capp Street San Francisco CA, 94110 United States	Electronic Service		No	21-566Official
83	Sarah	Mead	sarah.mead@wecenergygroup.com	MERC		null null, null United States	Electronic Service		No	21-566Official
84	Matthew	Melewski	matthew@theboutiquefirm.com	Nokomis Energy LLC & Ole Solar LLC		2639 Nicollet Ave Ste 200 Minneapolis MN, 55408 United States	Electronic Service		No	21-566Official
85	Joseph	Meyer	joseph.meyer@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	Bremer Tower, Suite 1400 445 Minnesota Street St Paul MN,	Electronic Service		No	21-566Official

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						55101-2131 United States				
86	Ana Sophia	Mifsud	amifsud@rmi.org	Rocky Mountain Institute (RMI)		null null, null United States	Electronic Service		No	21-566Official
87	Stacy	Miller	stacy.miller@minneapolismn.gov	City of Minneapolis		350 S. 5th Street Room M 301 Minneapolis MN, 55415 United States	Electronic Service		No	21-566Official
88	David	Moeller	dmoeller@allete.com	Minnesota Power			Electronic Service		No	21-566Official
89	Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP		33 South Sixth St Ste 4200 Minneapolis MN, 55402 United States	Electronic Service		No	21-566Official
90	Evan	Mulholland	emulholland@mncenter.org	Minnesota Center for Environmental Advocacy		1919 University Ave W Ste 515 Saint Paul MN, 55101 United States	Electronic Service		No	21-566Official
91	Alan	Muller	alan@greendel.org	Energy & Environmental Consulting		1110 West Avenue Red Wing MN, 55066 United States	Electronic Service		No	21-566Official
92	Carl	Nelson	cnelson@mncee.org	Center for Energy and Environment		212 3rd Ave N Ste 560 Minneapolis MN, 55401 United States	Electronic Service		No	21-566Official
93	David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency		220 South Sixth Street Suite 1300 Minneapolis MN, 55402 United States	Electronic Service		No	21-566Official
94	Samantha	Norris	samanthanorris@alliantenergy.com	Interstate Power and Light Company		200 1st Street SE PO Box 351 Cedar Rapids IA, 52406-0351 United States	Electronic Service		No	21-566Official
95	M. William	O'Brien	bobrien@mojlaw.com	Miller O'Brien Jensen, P.A.		120 S 6th St Ste 2400 Minneapolis MN, 55402 United States	Electronic Service		No	21-566Official
96	Ric	O'Connell	ric@gridlab.org	GridLab		2120 University Ave Berkeley CA, 94704 United States	Electronic Service		No	21-566Official
97	Logan	O'Grady	logrady@mnseia.org	Minnesota Solar Energy Industries Association		2288 University Ave W St. Paul MN, 55114 United States	Electronic Service		No	21-566Official
98	Carol A.	Overland	overland@legalectric.org	Legalectric - Overland Law Office		1110 West Avenue Red Wing MN, 55066 United States	Electronic Service		No	21-566Official
99	Greg	Palmer	gpalmer@greatermngas.com	Greater Minnesota Gas, Inc.		1900 Cardinal Ln PO Box 798 Faribault MN, 55021 United States	Electronic Service		No	21-566Official

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100	Jessica	Palmer Denig	jessica.palmer-denig@state.mn.us		Office of Administrative Hearings	600 Robert St N PO Box 64620 St. Paul MN, 55164 United States	Electronic Service		No	21-566Official
101	Antonio	Parisi	aparisi@sacyr.com	Sacyr Environment USA LLC		3330 Washington Blvd Ste 400 Arlington VA, 22201 United States	Electronic Service		No	21-566Official
102	Dean	Pawlowski	dpawlowski@otpco.com	Otter Tail Power Company		PO Box 496 215 S. Cascade St. Fergus Falls MN, 56537-0496 United States	Electronic Service		No	21-566Official
103	Catherine	Phillips	catherine.phillips@wecenergygroup.com	Minnesota Energy Resources		231 West Michigan St Milwaukee WI, 53203 United States	Electronic Service		No	21-566Official
104	J.	Porter	greg.porter@nngco.com	Northern Natural Gas Company		1111 South 103rd St Omaha NE, 68124 United States	Electronic Service		No	21-566Official
105	Kevin	Pranis	kpranis@liunagroc.com	Laborers' District Council of MN and ND		81 E Little Canada Road St. Paul MN, 55117 United States	Electronic Service		No	21-566Official
106	Victoria	Reinhardt	victoria.reinhardt@co.ramsey.mn.us	Partnership on Waste and Energy		Ramsey County Board Office 15 W. Kellogg Blvd., Ste. 220 St. Paul MN, 55102 United States	Electronic Service		No	21-566Official
107	Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	1400 BRM Tower 445 Minnesota St St. Paul MN, 55101-2131 United States	Electronic Service		Yes	21-566Official
108	Kevin	Reuther	kreuther@mncenter.org	MN Center for Environmental Advocacy		26 E Exchange St, Ste 206 St. Paul MN, 55101-1667 United States	Electronic Service		No	21-566Official
109	Nathaniel	Runke	nrunke@local49.org			611 28th St. NW Rochester MN, 55901 United States	Electronic Service		No	21-566Official
110	Bjorgvin	Saevarsson	bjorgvin@yorthgroup.com	Yorth		500 East Grant Street 1207 #1207 Minneapolis MN, 55404 United States	Electronic Service		No	21-566Official
111	Kevin	Saville	kevin.saville@ftr.com	Citizens/Frontier Communications		2378 Wilshire Blvd. Mound MN, 55364 United States	Electronic Service		No	21-566Official
112	Elizabeth	Schmiesing	eschmiesing@winthrop.com	Winthrop & Weinstine, P.A.		225 South Sixth Street Suite 3500 Minneapolis	Electronic Service		No	21-566Official

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114	Douglas	Seaton	doug.seaton@umwlc.org	Upper Midwest Law Center		8421 Wayzata Blvd Ste 300 Golden Valley MN, 55426 United States	Electronic Service		No	21-566Official
115	Patrick	Serfass	pserfass@ttcorp.com	American Biogas Council		1211 Connecticut Ave NW Ste 650 Washington DC, 20036 United States	Electronic Service		No	21-566Official
116	Patrick	Serfass	info@americanbiogascouncil.org	American Biogas Council		1211 Connecticut Ave NW Ste 650 Washington DC, 20036 United States	Electronic Service		No	21-566Official
117	Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates		7400 Lyndale Ave S Ste 190 Richfield MN, 55423 United States	Electronic Service		No	21-566Official
118	David	Shaffer	david.shaffer@novelenergy.biz	Novel Energy Solutions		2303 Wycliff St Ste 300 St. Paul MN, 55114 United States	Electronic Service		No	21-566Official
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122	Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.		76 W Kellogg Blvd St. Paul MN, 55102 United States	Electronic Service		No	21-566Official
123	Beth	Soholt	bsoholt@cleangridalliance.org	Clean Grid Alliance		570 Asbury Street Suite 201 St. Paul MN, 55104 United States	Electronic Service		No	21-566Official
124	Anna	Sommer	asommer@energyfuturesgroup.com	Energy Futures Group		PO Box 692 Canton NY, 13617 United States	Electronic Service		No	21-566Official
125	Peggy	Sorum	peggy.sorum@centerpointenergy.com	CenterPoint Energy		505 Nicollet Mall Minneapolis MN, 55402 United States	Electronic Service		No	21-566Official
126	Mark	Spurr	mspurr@fvbenergy.com	International District Energy		222 South Ninth St.,	Electronic Service		No	21-566Official

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128	Richard	Stasik	richard.stasik@wecenergygroup.com	Minnesota Energy Resources Corporation (HOLDING)		231 West Michigan St - P321 Milwaukee WI, 53203 United States	Electronic Service		No	21-566Official
129	Kristin	Stastny	kstastny@taftlaw.com	Taft Stettinius & Hollister LLP		2200 IDS Center 80 South 8th Street Minneapolis MN, 55402 United States	Electronic Service		No	21-566Official
130	James M	Strommen	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered		150 S 5th St Ste 700 Minneapolis MN, 55402 United States	Electronic Service		No	21-566Official
131	Kent	Sulem	ksulem@mmua.org			3131 Fernbrook Ln N Ste 200 Plymouth MN, 55447-5337 United States	Electronic Service		No	21-566Official
132	Matthew	Tomich	tomich@energy-vision.org	Energy Vision		138 E 13th St New York NY, 10003 United States	Electronic Service		No	21-566Official
133	Julie	Voeck	julie.voeck@nee.com	NextEra Energy Resources, LLC		700 Universe Blvd Juno Beach FL, 33408 United States	Electronic Service		No	21-566Official
134	Sam	Wade	sam@rngcoalition.com	Coalition for Renewable Natural Gas		1017 L Street #513 Sacramento CA, 95814 United States	Electronic Service		No	21-566Official
135	Nicole	Westling	nicole.westling@state.mn.us		Department of Commerce	85 7th Place E Suite 280 St Paul MN, 55001 United States	Electronic Service		No	21-566Official
136	Casey	Whelan	cwhelan@kinectenergy.com	Kinect Energy Group		605 Highway 169 N Ste 1200 Plymouth MN, 55441 United States	Electronic Service		No	21-566Official
137	Laurie	Williams	laurie.williams@sierraclub.org	Sierra Club		Environmental Law Program 1536 Wynkoop St Ste 200 Denver CO, 80202 United States	Electronic Service		No	21-566Official
138	Joseph	Windler	jwindler@winthrop.com	Winthrop & Weinstine		225 South Sixth Street, Suite 3500 Minneapolis MN, 55402 United States	Electronic Service		No	21-566Official
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140	Grant	Zimmerman	gzimmerman@ampamericas.com	Amp Americas		811 W Evergreen Ave Ste 201 Chicago IL, 60642 United States	Electronic Service		No	21-566Official
141	Kurt	Zimmerman	kwz@ibew160.org	Local Union #160, IBEW		2909 Anthony Ln St Anthony Village MN, 55418-3238 United States	Electronic Service		No	21-566Official
142	Patrick	Zomer	pat.zomer@lawmoss.com	Moss & Barnett PA		150 S 5th St #1200 Minneapolis MN, 55402 United States	Electronic Service		No	21-566Official

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6	Gary	Ambach	gambach@slipstreaminc.org	Slipstream, Inc.		8973 SW Village Loop Chanhassen MN, 55317 United States	Electronic Service		No	23-518Official
7	Kristine	Anderson	kanderson@greatermngas.com	Greater Minnesota Gas, Inc.		1900 Cardinal Lane PO Box 798 Faribault MN, 55021 United States	Electronic Service		No	23-518Official
8	Susan	Arntz	sarntz@mankatomn.gov	City Of Mankato		P.O. Box 3368 Mankato MN, 56002-3368 United States	Electronic Service		No	23-518Official
9	Mara	Ascheman	mara.k.ascheman@xcelenergy.com	Xcel Energy		414 Nicollet Mall Fl 5 Minneapolis MN, 55401 United States	Electronic Service		No	23-518Official
10	Michael J	Auger	michael.auger@ever-greenenergy.com	Ever-Green Energy		305 Saint Peter St Saint Paul MN, 55102 United States	Electronic Service		No	23-518Official
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12	Laura	Beaton	beaton@smwlaw.com	Shute, Mihaly & Weinberger LLP		396 Hayes Street San Francisco CA, 94102 United States	Electronic Service		No	23-518Official
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14	David	Bender	dbender@earthjustice.org	Earthjustice		1001 G Street NW Suite 1000 Washington DC, 20001 United States	Electronic Service		No	23-518Official
15	Christina	Benning	christina.benning@centerpointenergy.com	CenterPoint Energy Minnesota Gas			Electronic Service		No	23-518Official
16	Alicia	Berger	alicia.e.berger@xcelenergy.com	Xcel Energy		414 Nicollet Mall	Electronic Service		No	23-518Official

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						Minneapolis MN, 55401 United States				
17	Sherri	Billimoria	sbillimoria@rmi.org	Rocky Mountain Institute (RMI)		null null, null United States	Electronic Service		No	23-518Official
18	Mike	Boughner	michael.l.boughner@xcelenergy.com	Xcel Energy		414 Nicollet Mall Minneapolis MN, 55401 United States	Electronic Service		No	23-518Official
19	Tim	Brinkman	tim.brinkman@gvtel.com	Garden Valley Telephone Company d/b/a Garden Valley Technologies		206 Vance Ave S PO Box 259 Erskine MN, 56535 United States	Electronic Service		No	23-518Official
20	Matthew	Brodin	mbrodin@allete.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	23-518Official
21	Mike	Bull	mike.bull@state.mn.us		Public Utilities Commission	121 7th Place East, Suite 350 St. Paul MN, 55101 United States	Electronic Service		Yes	23-518Official
22	Roderick	Cameron	roderick.cameron@ftr.com	Frontier Communications of Minnesota, Inc.		180 South Clinton Avenue Rochester NY, 14646 United States	Electronic Service		No	23-518Official
23	James	Canaday	james.canaday@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	Suite 1400 445 Minnesota St. St. Paul MN, 55101 United States	Electronic Service		No	23-518Official
24	Thomas	Carlson	thomas.carlson@edf-re.com	EDF Renewable Energy		10 2nd St NE Ste. 400 Minneapolis MN, 55413 United States	Electronic Service		No	23-518Official
25	Melodee	Carlson Chang	melodee.carlsonchang@centerpointenergy.com	CenterPoint Energy		505 Nicollet Mall Minneapolis MN, 55402 United States	Electronic Service		No	23-518Official
26	Olivia	Carroll	oliviac@cubminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota St W1360 St. Paul MN, 55101 United States	Electronic Service		No	23-518Official
27	Margaret	Cherne-Hendrick	cherne-hendrick@fresh-energy.org			Fresh Energy 408 Saint Peter Street, Suite 220 St. Paul MN, 55102 United States	Electronic Service		No	23-518Official
28	Cody	Chilson	cchilson@greatermngas.com	Greater Minnesota Gas, Inc. & Greater MN Transmission, LLC		1900 Cardinal Ln PO Box 798 Faribault MN, 55021 United States	Electronic Service		No	23-518Official
29	Ray	Choquette	rchoquette@agp.com	Ag Processing Inc.		12700 West Dodge Road PO Box 2047 Omaha NE, 68103-2047 United States	Electronic Service		No	23-518Official
30	John	Coffman	john@johncoffman.net	AARP		871 Tuxedo Blvd. St, Louis MO,	Electronic Service		No	23-518Official

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						63119-2044 United States				
31	Sheri	Comer	sheri.comer@ftr.com	Frontier Communications Corporation		1500 MacCorkle Ave SE Charleston WV, 25396 United States	Electronic Service		No	23-518Official
32	Generic	Commerce Attorneys	commerce.attorneys@ag.state.mn.us		Office of the Attorney General - Department of Commerce	445 Minnesota Street Suite 1400 St. Paul MN, 55101 United States	Electronic Service		Yes	23-518Official
33	Jean	Comstock	jean.comstock.dbcc@gmail.com	St. Paul 350		729 6th St E St. Paul MN, 55106 United States	Electronic Service		No	23-518Official
34	Christopher	Cooper	chris.cooper@resource-solutions.org			1012 Torney Avenue San Francisco CA, 94129 United States	Electronic Service		No	23-518Official
35	George	Crocker	gwillc@nawo.org	North American Water Office		5093 Keats Avenue Lake Elmo MN, 55042 United States	Electronic Service		No	23-518Official
36	Joseph	Dammel	dammel@fresh-energy.org	Fresh Energy		408 Saint Peter St Ste 350 St. Paul MN, 55102 United States	Electronic Service		No	23-518Official
37	Seth	DeMerritt	seth.demerritt@centerpointenergy.com	CenterPoint Energy Minnesota Gas		505 Nicollet Mall Minneapolis MN, 55402 United States	Electronic Service		No	23-518Official
38	James	Denniston	james.r.denniston@xcelenergy.com	Xcel Energy Services, Inc.		414 Nicollet Mall, 401-8 Minneapolis MN, 55401 United States	Electronic Service		No	23-518Official
39	Ryan	Dougherty	ryan@geoexchange.org	Geothermal Exchange Organization		312 S 4th St Ste 100 SPRINGFIELD IL, 62701 United States	Electronic Service		No	23-518Official
40	J.	Drake Hamilton	hamilton@fresh-energy.org	Fresh Energy		408 St Peter St Ste 350 Saint Paul MN, 55101 United States	Electronic Service		No	23-518Official
41	Brian	Edstrom	briane@cubminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota St Ste W1360 Saint Paul MN, 55101 United States	Electronic Service		No	23-518Official
42	Caitlin	Eichten	eichten@fresh-energy.org	Fresh Energy		408 St Peter St #350 St. Paul MN, 55102 United States	Electronic Service		No	23-518Official
43	John	Farrell	jfarrell@ilsr.org	Institute for Local Self-Reliance		2720 E. 22nd St Institute for Local Self-Reliance Minneapolis MN, 55406 United States	Electronic Service		No	23-518Official
44	Sharon	Ferguson	sharon.ferguson@state.mn.us		Department of Commerce	85 7th Place E Ste 280 Saint Paul MN, 55101-2198 United States	Electronic Service		No	23-518Official

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47	Daryll	Fuentes	energy@usg.com	USG Corporation		550 W Adams St Chicago IL, 60661 United States	Electronic Service		No	23-518Official
48	Edward	Garvey	garveyed@aol.com	Residence		32 Lawton St Saint Paul MN, 55102 United States	Electronic Service		No	23-518Official
49	Debbie	Goettel	debbie.goettel@hennepin.us	Partnership on Waste and Energy		2785 White Bear Ave N Ste 350 Maplewood MN, 55109 United States	Electronic Service		No	23-518Official
50	Todd J.	Guerrero	todd.guerrero@kutakrock.com	Kutak Rock LLP		Suite 1750 220 South Sixth Street Minneapolis MN, 55402-1425 United States	Electronic Service		No	23-518Official
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52	Philip	Hayet	phayet@jkenn.com	J. Kennedy and Associates, Inc.		570 Colonial Park Drive Suite 305 Roswell GA, 30075-3770 United States	Electronic Service		No	23-518Official
53	Adam	Heinen	aheinen@dakotaelectric.com	Dakota Electric Association		4300 220th St W Farmington MN, 55024 United States	Electronic Service		No	23-518Official
54	Mike	Henchen	mhenchen@rmi.org	Rocky Mountain Institute (RMI)		null null, null United States	Electronic Service		No	23-518Official
55	Annete	Henkel	mui@mnutilityinvestors.org	Minnesota Utility Investors		413 Wacouta Street #230 St.Paul MN, 55101 United States	Electronic Service		No	23-518Official
56	Joylyn C	Hoffman Malueg	joylyn.hoffmanmalueg@wecenergygroup.com	Minnesota Energy Resources		2685 145th St W Rosemount MN, 55068 United States	Electronic Service		No	23-518Official
57	Michael	Hoppe	lu23@ibew23.org	Local Union 23, I.B.E.W.		445 Etna Street Ste. 61 St. Paul MN, 55106 United States	Electronic Service		No	23-518Official
58	Travis	Jacobson	travis.jacobson@mdu.com	Great Plains Natural Gas Company		400 N 4th St Bismarck ND, 58501 United States	Electronic Service		No	23-518Official
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63	Brendan	Jordan	bjordan@gpisd.net	Great Plains Institute & Bioeconomy Coalition of MN		2801 21st Ave S Ste 220 Minneapolis MN, 55407 United States	Electronic Service		No	23-518Official
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67	Michael	Kaphing	michael.w.kaphing@xcelenergy.com	Xcel Energy		414 Nicollet Mall (401-8th Floor) Minneapolis MN, 55401 United States	Electronic Service		No	23-518Official
68	William	Kenworthy	will@votesolar.org			1 South Dearborn St Ste 2000 Chicago IL, 60603 United States	Electronic Service		No	23-518Official
69	Samuel B.	Ketchum	sketchum@kennedy-graven.com	Kennedy & Graven, Chartered		150 S 5th St Ste 700 Minneapolis MN, 55402 United States	Electronic Service		No	23-518Official
70	Hudson	Kingston	hudson@curemn.org			PO Box 712 Ely MN, 55731 United States	Electronic Service		No	23-518Official
71	Frank	Kohlasch	frank.kohlasch@state.mn.us		Minnesota Pollution Control Agency	520 Lafayette Rd N. St. Paul MN, 55155 United States	Electronic Service		No	23-518Official
72	Nicolle	Kupser	nkupser@greatermngas.com	Greater Minnesota Gas, Inc.		1900 Cardinal Ln PO Box 798 Faribault MN, 55021 United States	Electronic Service		No	23-518Official
73	Brenda	Kyle	bkyle@stpaulchamber.com	St. Paul Area Chamber of Commerce		401 N Robert Street Suite 150 St Paul MN, 55101 United States	Electronic Service		No	23-518Official

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76	Samuel	Lehr	sam.lehr@rngcoalition.com	Coalition for Renewable Natural Gas		1017 L St #513 Sacramento CA, 95814 United States	Electronic Service		No	23-518Official
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79	Annie	Levenson Falk	annielf@cubminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota Street, Suite W1360 St. Paul MN, 55101 United States	Electronic Service		No	23-518Official
80	Amy	Liberkowski	amy.a.liberkowski@xcelenergy.com	Xcel Energy		414 Nicollet Mall 7th Floor Minneapolis MN, 55401-1993 United States	Electronic Service		No	23-518Official
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82	Jason	Loos	jason.loos@centerpointenergy.com	CenterPoint Energy Resources Corp.		505 Nicollet Mall 3rd Floor Minneapolis MN, 55402 United States	Electronic Service		No	23-518Official
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87	Mary	Martinka	mary.a.martinka@xcelenergy.com	Xcel Energy Inc		414 Nicollet Mall 7th Floor Minneapolis MN, 55401 United States	Electronic Service		No	23-518Official
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91	Matthew	Melewski	matthew@theboutiquefirm.com	Nokomis Energy LLC & Ole Solar LLC		2639 Nicollet Ave Ste 200 Minneapolis MN, 55408 United States	Electronic Service		No	23-518Official
92	Joseph	Meyer	joseph.meyer@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	Bremer Tower, Suite 1400 445 Minnesota Street St Paul MN, 55101-2131 United States	Electronic Service		No	23-518Official
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94	Stacy	Miller	stacy.miller@minneapolismn.gov	City of Minneapolis		350 S. 5th Street Room M 301 Minneapolis MN, 55415 United States	Electronic Service		No	23-518Official
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96	Tena	Monson	tmonson@cityofardenhills.org	City of Arden Hills		1245 West Highway 96 Arden Hills MN, 55112 United States	Electronic Service		No	23-518Official
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101	David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency		220 South Sixth Street Suite 1300 Minneapolis MN, 55402 United States	Electronic Service		No	23-518Official
102	Samantha	Norris	samanthanorris@alliantenergy.com	Interstate Power and Light Company		200 1st Street SE PO Box 351 Cedar Rapids IA, 52406-0351 United States	Electronic Service		No	23-518Official
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						MN, 55402 United States				
104	Ric	O'Connell	ric@gridlab.org	GridLab		2120 University Ave Berkeley CA, 94704 United States	Electronic Service		No	23-518Official
105	Logan	O'Grady	logrady@mnseia.org	Minnesota Solar Energy Industries Association		2288 University Ave W St. Paul MN, 55114 United States	Electronic Service		No	23-518Official
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107	Greg	Palmer	gpalmer@greatermngas.com	Greater Minnesota Gas, Inc.		1900 Cardinal Ln PO Box 798 Faribault MN, 55021 United States	Electronic Service		No	23-518Official
108	Jessica	Palmer Denig	jessica.palmer-denig@state.mn.us		Office of Administrative Hearings	600 Robert St N PO Box 64620 St. Paul MN, 55164 United States	Electronic Service		No	23-518Official
109	Antonio	Parisi	aparisi@sacyr.com	Sacyr Environment USA LLC		3330 Washington Blvd Ste 400 Arlington VA, 22201 United States	Electronic Service		No	23-518Official
110	Dean	Pawlowski	dpawlowski@otpco.com	Otter Tail Power Company		PO Box 496 215 S. Cascade St. Fergus Falls MN, 56537-0496 United States	Electronic Service		No	23-518Official
111	Catherine	Phillips	catherine.phillips@wecenergygroup.com	Minnesota Energy Resources		231 West Michigan St Milwaukee WI, 53203 United States	Electronic Service		No	23-518Official
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113	Kevin	Pranis	kpranis@liunagroc.com	Laborers' District Council of MN and ND		81 E Little Canada Road St. Paul MN, 55117 United States	Electronic Service		No	23-518Official
114	Victoria	Reinhardt	victoria.reinhardt@co.ramsey.mn.us	Partnership on Waste and Energy		Ramsey County Board Office 15 W. Kellogg Blvd., Ste. 220 St. Paul MN, 55102 United States	Electronic Service		No	23-518Official
115	Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	1400 BRM Tower 445 Minnesota St St. Paul MN, 55101-2131 United States	Electronic Service		Yes	23-518Official
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