414 Nicollet Mall
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September 9, 2025

—Via Electronic Filing—

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

RE: REPLY COMMENTS
NATURAL GAS INNOVATION ACT PLAN
DOCKET NOS. G002/M-23-518 & G999/CI-21-566

Dear Mr. Bull:

Northern States Power Company, doing business as Xcel Energy, submits the enclosed Reply Comments per the Commission's August 21, 2025 Notice of Reply Comment Period.

We have electronically filed this document with the Minnesota Public Utilities Commission, and copies have been served on the parties on the attached service list. Please contact Taige Tople at 612-216-7953 or taige.d.tople@xcelenergy.com or contact me at Holly.R.Hinman@Xcelenergy.com if you have any questions regarding this filing.

Sincerely,

/s/

HOLLY HINMAN
DIRECTOR, REGULATORY AND STRATEGIC ANALYSIS

Enclosure
cc: Service Lists

STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION

Katie J. Sieben	Chair
Hwikwon Ham	Commissioner
Audrey C. Partridge	Commissioner
Joseph K. Sullivan	Commissioner
John A. Tuma	Commissioner

IN THE MATTER OF XCEL ENERGY'S NATURAL GAS INNOVATION PLAN	DOCKET NOS. G002/M-23-518 & G999/CI-21-566

REPLY COMMENTS

INTRODUCTION

Northern States Power Company, doing business as Xcel Energy (Company), submits the enclosed Reply Comments per the Commission's August 21, 2025 Notice of Reply Comment Period.

The Sherco Hydrogen pilot is an exciting opportunity to generate learnings under the NGIA (Natural Gas Innovation Act). The pilot will produce green hydrogen using an electrolyzer powered by renewable energy. The hydrogen will be blended with natural gas to provide fuel to an existing onsite auxiliary steam boiler system, which currently supplies steam for start-up of the coal units, heating for the Sherco building, and to provide steam for an existing industrial customer. The Company will have the opportunity to assess hydrogen's energy potential, from production to offtake. In addition, the location allows the pilot to contribute to and benefit from the transformation of the Sherco site into a clean energy hub, encouraging green energy job creation. It will also provide a zero-carbon fuel option to displace some natural gas usage and reduce greenhouse gas emissions.

The Company would like to begin this pilot as soon as possible, but it has concerns regarding the OAG's recommendation in Docket No. G002/M-25-259 that the affiliate interest arrangement should be modified to require the Company to assume all risks and costs of a stranded asset. The Company believes that such an outcome would be unreasonable as well as being precluded by prior determinations by the Commission in its Order of May 16, 2025. If the Commission concludes that the risks and costs of a stranded asset in the Sherco Hydrogen pilot should be treated the same

as any other NGIA pilot, and are not required to be borne by the Company, then the Company requests that permission to proceed with the Sherco pilot be given ahead of a final order in Docket No. G002/M-25-259.

COMMENTS

I. PROCEDURAL BACKGROUND

The Commission approved the Company's Natural Gas Innovation Act (NGIA) plan in an Order issued on May 16, 2025 (NGIA Order). On June 16, 2025, the Company submitted two filings in compliance with the Commission's NGIA Order specific to the Company's Shero Hydrogen pilot: (1) a filing that describes the Company's plan to mitigate the risks of stranded assets;[1] and (2) a petition in a new docket[2] regarding the affiliate interest arrangement.[3]

On August 15, 2025, the OAG responded to both of these filings, combining its comments on the affiliate interest arrangement with its objection to the "negative checkoff" period on the Company's compliance filing addressing risk mitigation.

On August 21, 2025, the Commission issued a Notice of Reply Comment Period, which noted that the sufficiency of the affiliate interest agreement would be discussed in Docket No. G002/M-25-259 and identifying issues regarding risk mitigation to be resolved in Reply Comments in this docket.[4]

The Notice of Reply Comment Period identified the following topics open for comment in this docket:

- 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?

[1] In compliance with Order Point 6.
[2] Docket No. G002/AI-25-259.
[3] In compliance with Order Point 8.A.
[4] Notice of Reply Comment Period issued on August 21, 2025 at 1.

As discussed further below, the Company requests permission to proceed with the Sherco pilot ahead of a final order in Docket No. G002/M-25-259 if the Commission agrees that the Company is not required to assume the risks and costs of a stranded asset in the Sherco pilot. The Company has provided several viable options for fully utilizing the electrolyzer which make the risk of a stranded asset low, so the Company believes that no further action is needed regarding the OAG's comments.

II. PROCEEDING WITH THE SHERCO HYDROGEN PILOT AHEAD OF A FINAL DECISION IN THE AFFILIATE INTEREST DOCKET

The Company appreciates the Commission seeking comments on whether the Company should be allowed to proceed with the Sherco Hydrogen pilot ahead of a final decision in the affiliate interest docket. The Company is eager to start the pilot to ensure that there is sufficient time to meet the new deadline (as revised in the federal government's tax reconciliation measures signed into law on July 4, 2025) for obtaining Inflation Reduction Act (IRA) Production Tax Credits (PTC) for this pilot. The new deadline requires that construction begin prior to January 1, 2028. Significant planning and advanced work is needed prior to construction, making it important to begin as soon as possible to secure these tax benefits.

The Company is excited about the potential skills and learnings it will get from the pilot, including the valuable opportunity to gain experience with hydrogen production, storage, safety and offtake which it plans to share publicly. This pilot will be an important part of achieving the goals of the NGIA in the Company's plan.

The outcome of the affiliate interest arrangement docket, however, could affect the viability of the Sherco Hydrogen pilot. For instance, it would significantly change the Company's ability to move forward with this pilot if the Commission agrees with the OAG's recommendation that the Company should bear all stranded asset risks and costs for the electrolyzer. The Company does not believe this would be a reasonable outcome for reasons stated in Docket No. G002/M-25-259, including that the Commission has already determined that "[t]he relationships between Xcel's regulated operations and its affiliate operations, and between the affiliate and the industrial customer, predate the emergence of the proposed electrolyzer pilot, so the costs, benefits, and risks of those existing arrangements cannot be attributed to the pilot."[5]

Moreover, as with other pilots, benefits will accrue to customers so it makes sense that they would bear its costs. As noted in the NGIA Order, "the Commission finds

[5] NGIA Order at 9.

that the increased operating cost arising from procuring hydrogen in lieu of natural gas is appropriately understood as a cost of reducing GHG emissions rather than a cost of generating steam; thus the Commission will not bar Xcel from seeking to recover these costs in the same manner as other NGIA costs."[6] Additional reasons it would not be reasonable to require the Company to assume all the risks and costs of a stranded asset are discussed in Section III.A below.

To the extent that the Commission maintains its prior determinations which support the conclusion that risks and costs associated with the pilot should be treated like any other NGIA pilot and are not required to be borne by the Company, the Company requests that permission be given to start the Sherco Hydrogen pilot ahead of a final order in Docket No. G002/M-25-259. Permission to proceed is warranted to further the goals of the NGIA so that the Sherco Hydrogen pilot can be implemented within the timeline of the Company's NGIA plan. Additionally, as discussed above, the Company must meet a construction start deadline of January 1, 2028 to receive PTC tax benefits.

If it is possible, however, that the Commission would require the Company to assume all risks and costs of a stranded asset, we would need a final decision in the affiliated interest docket[7] to decide whether it is feasible to undertake the Sherco Hydrogen pilot.

III. ACTIONS THE COMMISSION SHOULD TAKE IN RESPONSE TO THE OBJECTIONS RAISED BY THE OAG

The Company addressed the arguments raised by the OAG in Docket No. G002/M-25-259. For convenience, we provide our responses here, which focus on risk mitigation. For the reasons discussed below, the Company's position is that the Commission need not take any action in response to the objections raised by the OAG.

A. Order Point 6 of the NGIA Order does not Require the Company to Absorb all Risk

The OAG argued that "the Commission should modify the arrangement to make it clear that Xcel's shareholders must bear *all* risks of its unregulated venture's use of the electrolyzer"[8] and that "should LPI stop taking steam service from Xcel's unregulated

[6] *Id.*
[7] Docket No. G002/M-25-259.
[8] OAG comments at 7-8 (emphasis in original).

affiliate and no alternative use is found for the electrolyzer, Xcel should not be permitted to recover any undepreciated capital costs or return for the electrolyzer."[9,10]

The Company disagrees. The Company was ordered to provide strategies to mitigate, not eliminate, the risk of a stranded asset.

Order Point 6 of the NGIA Order states:

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.

While Order Point 6 requires that the Company provide strategies to mitigate the risk of a stranded asset with the Sherco pilot, it does not require that the Company to absorb all risk. Nor would such a requirement be reasonable. Pilots in general contain inherent risk, and NGIA pilots, which involve unfamiliar technology for the Company, are no exception. While the Company has not and cannot guarantee elimination of all risk from undertaking this pilot, the Company believes it has provided strong mitigation strategies to minimize the stranded asset risk, as discussed further below.

B. The Company Has Provided Robust Mitigation Measures, Making the Risk of Stranded Assets Low

The Company's compliance with Order Point 6 described several robust mitigation strategies for the potential risk of the electrolyzer becoming a stranded asset.[11] Those strategies are: (1) providing fuel to the auxiliary boiler to produce steam for the existing industrial client whose current contract is set to expire in 2035;[12] (2) providing fuel to the auxiliary boiler to heat the Sherco buildings as needed for facility operations; (3) opportunities for future industrial partnerships near Sherco through economic development planned by the Sherburne County Power Plant Development Master Plan; and (4) the potential for electrolyzer use at other Company locations.

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[9] OAG comments at 8.

[10] The OAG's arguments are based on its claim that "Xcel's unregulated affiliate is benefiting from the construction and use of the electrolyzer, and it should bear the risks." OAG comments at 8. As discussed more fully in Docket No. G002/M-25-259, the pilot does not provide a benefit to the affiliate and the Commission has already determined that "costs, benefits, and risks of those existing arrangements cannot be attributed to the pilot." NGIA Order at 9.

[11] *See* Compliance filing for Order Point 6, filed June 16, 2025 in Docket No. G002/M-23-518.

[12] The customer has been with the Company for over 30 years and could chose to renew the contract. It could also terminate the contract by providing 12 months' notice.

Accordingly, the Company believes the stranded asset risk to be low.

The OAG questioned the viability of mitigation strategy (2) by asking whether the Sherco operational buildings will be needed after coal retirement.[13] The Company anticipates continued use of these facilities to operate the synchronous condensers, a grid stability tool needed to regulate power from wind and solar. The synchronous condensers require building heat because of the sensitivity of that equipment to freezing. The OAG also observed "these buildings can be currently heated by the aux boiler, so electrolyzer use is not needed."[14] This is true, but this has always been true ever since this pilot was conceived and proposed. The goal of the pilot is to gain knowledge about how to manage and maximize efficiency of green hydrogen. Even though the auxiliary boiler can provide heat and steam without the addition of the pilot's hydrogen, the Company would run the pilot to obtain these skills and learnings.

The OAG also critiqued that mitigation strategy (3) relies on a master plan for economic development instead of identifying specific alternative potential customers.[15] As noted in the Company's compliance filing for Order Point 6, the Sherburne County Power Plant Development Master Plan addresses development of approximately 1,800 acres of the adjacent parcels to Sherco. Over half of the developable land was determined to be optimal for large, single-user industrial sites, and the remaining 900 acres were deemed available for smaller-scale industrial uses such as manufacturing and warehouses. This provides significant opportunity to seek additional hydrogen offtake partners, should the need arise. The Company believes that it is unrealistic to expect a specific list of alternative industrial customers while the master plan that would provide that information is still being developed and before there is a need.

The Company believes that these options make the risk of a stranded asset in the Sherco pilot relatively low and therefore recommends that the Commission find the Company's risk mitigation plan acceptable and take no further action with regards to the OAG's comments.

[13] OAG comments at 4.
[14] OAG comments at 4-5 (footnote omitted).
[15] OAG comments at 5.

C. Management of Cost Recovery if the Industrial Customer were to Withdraw Before the Company has Fully Recovered the Asset's Costs

As noted above, if the industrial customer were to withdraw before the full cost of the electrolyzer had been recovered, there are at least three other options to fully utilize the asset: continuing use of the electrolyzer to provide fuel to the auxiliary boiler to heat operational buildings at Sherco, the potential of other industrial partnerships near Sherco, and using the electrolyzer at other Company sites.

In the unlikely event that all of these options fail, the Company would pursue cost recovery for any outstanding plant balance that remains, as stated in the Company's compliance filing in response to Order Point 6.[16] The Company would maintain recovery of the outstanding balance under the Commission approved NGIA Rider or, if approved, under base rates.

The Company believes this plan to be reasonable and in keeping with other regulated projects done on behalf of customers.

D. Other Issues or Concerns

None at this time.

CONCLUSION

If the Commission, consistent with its previous statements in the NGIA Order, agrees that the risks and costs associated with the pilot should be treated like any other NGIA pilot and are not required to be borne by the Company, then the Company requests that it be allowed to proceed with its Sherco Hydrogen pilot ahead of a final decision in Docket No. G002/M-25-259. The Company believes its mitigation strategy to avoid stranded assets is reasonable and accordingly requests that no further action be taken in response to the OAG's comments.

Dated: September 9, 2025

[16] Filed in this docket on June 16, 2025 at 5.

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 NOS. G002/M-23-516
G999/CI-21-566

Dated this 9th day of September 2025

/s/
_____
Marie Horner
Regulatory Administrator

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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
77	Robert	Lems	administration@dmt-cgs.com	DMT Clear Gas Solutions		19125 SW 125th Ct Tualatin OR, 97062 United States	Electronic Service		No	23-518Official
78	Rachel	Leonard	rachel.leonard@ci.monticello.mn.us	City of Monticello		505 Walnut St Ste 1 Monticello MN, 55362 United States	Electronic Service		No	23-518Official
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
81	Eric	Lipman	eric.lipman@state.mn.us		Office of Administrative Hearings	PO Box 64620 St. Paul MN, 55164-0620 United States	Electronic Service		No	23-518Official
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
83	Kavita	Maini	kmaini@wi.rr.com	KM Energy Consulting, LLC		961 N Lost Woods Rd Oconomowoc WI, 53066 United States	Electronic Service		No	23-518Official
84	Emily	Marshall	emarshall@lourismarshall.com	Miller O'Brien Jensen, PA		120 S. 6th Street Suite 2400 Minneapolis MN, 55402 United States	Electronic Service		No	23-518Official
85	Nicholas	Martin	nicholas.f.martin@xcelenergy.com	Xcel Energy		414 Nicollet Mall 7th floor Minneapolis MN, 55401 United States	Electronic Service		No	23-518Official
86	Linda	Martinez	lmartinez@auri.org	Agricultural Utilization Research Institute		null null, null United States	Electronic Service		No	23-518Official
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
88	Daryl	Maxwell	dmaxwell@hydro.mb.ca	Manitoba Hydro		360 Portage Ave FL 16	Electronic Service		No	23-518Official

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90	Sarah	Mead	sarah.mead@wecenergygroup.com	MERC		null null, null United States	Electronic Service		No	23-518Official
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
93	Ana Sophia	Mifsud	amifsud@rmi.org	Rocky Mountain Institute (RMI)		null null, null United States	Electronic Service		No	23-518Official
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
95	David	Moeller	dmoeller@allete.com	Minnesota Power			Electronic Service		No	23-518Official
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
97	Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP		33 South Sixth St Ste 4200 Minneapolis MN, 55402 United States	Electronic Service		No	23-518Official
98	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	23-518Official
99	Alan	Muller	alan@greendel.org	Energy & Environmental Consulting		1110 West Avenue Red Wing MN, 55066 United States	Electronic Service		No	23-518Official
100	Carl	Nelson	cnelson@mncee.org	Center for Energy and Environment		212 3rd Ave N Ste 560 Minneapolis MN, 55401 United States	Electronic Service		No	23-518Official
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
103	M. William	O'Brien	bobrien@mojlaw.com	Miller O'Brien Jensen, P.A.		120 S 6th St Ste 2400 Minneapolis	Electronic Service		No	23-518Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
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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
106	Carol A.	Overland	overland@legalectric.org	Legalectric - Overland Law Office		1110 West Avenue Red Wing MN, 55066 United States	Electronic Service		No	23-518Official
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
112	J.	Porter	greg.porter@nngco.com	Northern Natural Gas Company		1111 South 103rd St Omaha NE, 68124 United States	Electronic Service		No	23-518Official
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
116	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	23-518Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
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118	Bjorgvin	Saevarsson	bjorgvin@yorthgroup.com	Yorth		500 East Grant Street 1207 #1207 Minneapolis MN, 55404 United States	Electronic Service		No	23-518Official
119	Kevin	Saville	kevin.saville@ftr.com	Citizens/Frontier Communications		2378 Wilshire Blvd. Mound MN, 55364 United States	Electronic Service		No	23-518Official
120	Elizabeth	Schmiesing	eschmiesing@winthrop.com	Winthrop & Weinstine, P.A.		225 South Sixth Street Suite 3500 Minneapolis MN, 55402 United States	Electronic Service		No	23-518Official
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122	Douglas	Seaton	doug.seaton@umwlc.org	Upper Midwest Law Center		8421 Wayzata Blvd Ste 300 Golden Valley MN, 55426 United States	Electronic Service		No	23-518Official
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126	David	Shaffer	david.shaffer@novelenergy.biz	Novel Energy Solutions		2303 Wycliff St Ste 300 St. Paul MN, 55114 United States	Electronic Service		No	23-518Official
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#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
131	Beth	Soholt	bsoholt@cleangridalliance.org	Clean Grid Alliance		570 Asbury Street Suite 201 St. Paul MN, 55104 United States	Electronic Service		No	23-518Official
132	Anna	Sommer	asommer@energyfuturesgroup.com	Energy Futures Group		PO Box 692 Canton NY, 13617 United States	Electronic Service		No	23-518Official
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134	Mark	Spurr	mspurr@fvbenergy.com	International District Energy Association		222 South Ninth St., Suite 825 Minneapolis MN, 55402 United States	Electronic Service		No	23-518Official
135	Byron E.	Starns	byron.starns@stinson.com	STINSON LLP		50 S 6th St Ste 2600 Minneapolis MN, 55402 United States	Electronic Service		No	23-518Official
136	Richard	Stasik	richard.stasik@wecenergygroup.com	Minnesota Energy Resources Corporation (HOLDING)		231 West Michigan St - P321 Milwaukee WI, 53203 United States	Electronic Service		No	23-518Official
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148	Grant	Zimmerman	gzimmerman@ampamericas.com	Amp Americas		811 W Evergreen Ave Ste 201 Chicago IL, 60642 United States	Electronic Service		No	23-518Official
149	Kurt	Zimmerman	kwz@ibew160.org	Local Union #160, IBEW		2909 Anthony Ln St Anthony Village MN, 55418-3238 United States	Electronic Service		No	23-518Official
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15	Alicia	Berger	alicia.e.berger@xcelenergy.com	Xcel Energy		414 Nicollet Mall Minneapolis MN, 55401 United States	Electronic Service		No	21-566Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
16	Sherri	Billimoria	sbillimoria@rmi.org	Rocky Mountain Institute (RMI)		null null, null United States	Electronic Service		No	21-566Official
17	Mike	Boughner	michael.l.boughner@xcelenergy.com	Xcel Energy		414 Nicollet Mall Minneapolis MN, 55401 United States	Electronic Service		No	21-566Official
18	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	21-566Official
19	Matthew	Brodin	mbrodin@allete.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	21-566Official
20	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	21-566Official
21	Roderick	Cameron	roderick.cameron@ftr.com	Frontier Communications of Minnesota, Inc.		180 South Clinton Avenue Rochester NY, 14646 United States	Electronic Service		No	21-566Official
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23	Thomas	Carlson	thomas.carlson@edf-re.com	EDF Renewable Energy		10 2nd St NE Ste. 400 Minneapolis MN, 55413 United States	Electronic Service		No	21-566Official
24	Melodee	Carlson Chang	melodee.carlsonchang@centerpointenergy.com	CenterPoint Energy		505 Nicollet Mall Minneapolis MN, 55402 United States	Electronic Service		No	21-566Official
25	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	21-566Official
26	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	21-566Official
27	Ray	Choquette	rchoquette@agp.com	Ag Processing Inc.		12700 West Dodge Road PO Box 2047 Omaha NE, 68103-2047 United States	Electronic Service		No	21-566Official
28	John	Coffman	john@johncoffman.net	AARP		871 Tuxedo Blvd. St, Louis MO, 63119-2044 United States	Electronic Service		No	21-566Official
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#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
30	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	21-566Official
31	Jean	Comstock	jean.comstock.dbcc@gmail.com	St. Paul 350		729 6th St E St. Paul MN, 55106 United States	Electronic Service		No	21-566Official
32	George	Crocker	gwillc@nawo.org	North American Water Office		5093 Keats Avenue Lake Elmo MN, 55042 United States	Electronic Service		No	21-566Official
33	Joseph	Dammel	dammel@fresh-energy.org	Fresh Energy		408 Saint Peter St Ste 350 St. Paul MN, 55102 United States	Electronic Service		No	21-566Official
34	Seth	DeMerritt	seth.demerritt@centerpointenergy.com	CenterPoint Energy Minnesota Gas		505 Nicollet Mall Minneapolis MN, 55402 United States	Electronic Service		No	21-566Official
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37	Brian	Edstrom	briane@cubminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota St Ste W1360 Saint Paul MN, 55101 United States	Electronic Service		No	21-566Official
38	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	21-566Official
39	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	21-566Official
40	Mike	Fiterman	mikefiterman@libertydiversified.com	Liberty Diversified International		5600 N Highway 169 Minneapolis MN, 55428-3096 United States	Electronic Service		No	21-566Official
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#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
44	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	21-566Official
45	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	21-566Official
46	Kim	Havey	kim.havey@minneapolismn.gov	City of Minneapolis		350 South 5th Street, Suite 315M Minneapolis MN, 55415 United States	Electronic Service		No	21-566Official
47	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	21-566Official
48	Adam	Heinen	aheinen@dakotaelectric.com	Dakota Electric Association		4300 220th St W Farmington MN, 55024 United States	Electronic Service		No	21-566Official
49	Mike	Henchen	mhenchen@rmi.org	Rocky Mountain Institute (RMI)		null null, null United States	Electronic Service		No	21-566Official
50	Annete	Henkel	mui@mnutilityinvestors.org	Minnesota Utility Investors		413 Wacouta Street #230 St.Paul MN, 55101 United States	Electronic Service		No	21-566Official
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52	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	21-566Official
53	Travis	Jacobson	travis.jacobson@mdu.com	Great Plains Natural Gas Company		400 N 4th St Bismarck ND, 58501 United States	Electronic Service		No	21-566Official
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#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
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64	Frank	Kohlasch	frank.kohlasch@state.mn.us		Minnesota Pollution Control Agency	520 Lafayette Rd N. St. Paul MN, 55155 United States	Electronic Service		No	21-566Official
65	Nicolle	Kupser	nkupser@greatermngas.com	Greater Minnesota Gas, Inc.		1900 Cardinal Ln PO Box 798 Faribault MN, 55021 United States	Electronic Service		No	21-566Official
66	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	21-566Official
67	Carmel	Laney	carmel.laney@stoel.com	Stoel Rives LLP		33 South Sixth Street Suite 4200 Minneapolis MN, 55402 United States	Electronic Service		No	21-566Official
68	Peder	Larson	plarson@larkinhoffman.com	Larkin Hoffman Daly & Lindgren, Ltd.		8300 Norman Center Drive Suite 1000 Bloomington MN, 55437 United States	Electronic Service		No	21-566Official
69	Samuel	Lehr	sam.lehr@rngcoalition.com	Coalition for Renewable Natural Gas		1017 L St #513 Sacramento CA, 95814 United States	Electronic Service		No	21-566Official
70	Robert	Lems	administration@dmt-cgs.com	DMT Clear Gas Solutions		19125 SW 125th Ct Tualatin OR, 97062 United States	Electronic Service		No	21-566Official
71	Rachel	Leonard	rachel.leonard@ci.monticello.mn.us	City of Monticello		505 Walnut St Ste 1 Monticello MN, 55362 United States	Electronic Service		No	21-566Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
72	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	21-566Official
73	Amy	Liberkowski	amy.a.liberkowski@xcelenergy.com	Xcel Energy		414 Nicollet Mall 7th Floor Minneapolis MN, 55401-1993 United States	Electronic Service		No	21-566Official
74	Eric	Lipman	eric.lipman@state.mn.us		Office of Administrative Hearings	PO Box 64620 St. Paul MN, 55164-0620 United States	Electronic Service		No	21-566Official
75	Jason	Loos	jason.loos@centerpointenergy.com	CenterPoint Energy Resources Corp.		505 Nicollet Mall 3rd Floor Minneapolis MN, 55402 United States	Electronic Service		No	21-566Official
76	Kavita	Maini	kmaini@wi.rr.com	KM Energy Consulting, LLC		961 N Lost Woods Rd Oconomowoc WI, 53066 United States	Electronic Service		No	21-566Official
77	Emily	Marshall	emarshall@lourismarshall.com	Miller O'Brien Jensen, PA		120 S. 6th Street Suite 2400 Minneapolis MN, 55402 United States	Electronic Service		No	21-566Official
78	Nicholas	Martin	nicholas.f.martin@xcelenergy.com	Xcel Energy		414 Nicollet Mall 7th floor Minneapolis MN, 55401 United States	Electronic Service		No	21-566Official
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

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						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

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
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

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						MN, 55402 United States				
113	Christine	Schwartz	regulatory.records@xcelenergy.com	Xcel Energy		414 Nicollet Mall, MN1180-07-MCA Minneapolis MN, 55401-1993 United States	Electronic Service		No	21-566Official
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
119	Andrew R.	Shedlock	andrew.shedlock@kutakrock.com	Kutak Rock LLP		60 South Sixth St Ste 3400 Minneapolis MN, 55402-4018 United States	Electronic Service		No	21-566Official
120	Beth	Smith	bsmith@greatermankato.com	Greater Mankato Growth		1961 Premier Dr Ste 100 Mankato MN, 56001 United States	Electronic Service		No	21-566Official
121	Joshua	Smith	joshua.smith@sierraclub.org			85 Second St FL 2 San Francisco CA, 94105 United States	Electronic Service		No	21-566Official
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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				Association		Suite 825 Minneapolis MN, 55402 United States				
127	Byron E.	Starns	byron.starns@stinson.com	STINSON LLP		50 S 6th St Ste 2600 Minneapolis MN, 55402 United States	Electronic Service		No	21-566Official
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
139	Tim	Wulling	t.wulling@earthlink.net			1495 Raymond Ave. Saint Paul MN, 55108 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