COMMERCE DEPARTMENT

November 12, 2025

Sasha Bergman
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, Minnesota 55101-2147

RE: Comments of the Minnesota Department of Commerce
Docket No. G002/M-25-403

Dear Ms. Bergman,

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

Petition for Approval of SEP Rider Recovery with True-Up Mechanisms.

The Petition was filed by Northern States Power Company, d/b/a Xcel Energy (Xcel) on October 31, 2025.

The Department recommends that the Minnesota Public Utilities Commission (Commission) **deny** Xcel's Petition and also **requests additional information and clarification regarding Xcel's Proposed SEP Rider Recovery with True-Up Mechanism** as described herein. The Department is available to answer any questions the Minnesota Public Utilities Commission may have.

Sincerely,

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

AU/ar
Attachment

COMMERCE DEPARTMENT

Before the Minnesota Public Utilities Commission

Comments of the Minnesota Department of Commerce

Docket No. G002/M-25-403

I. INTRODUCTION

On October 31, 2025, Northern States Power Company, d/b/a Xcel Energy (Xcel or the Company) filed a general rate case with the Minnesota Public Utilities Commission (Commission) to increase rates for natural gas utility service in Docket No. G002/GR-25-356.[1] In its 2025 Rate Case, Xcel is seeking an increase in base revenue of $63.4 million per year (or 8.2 percent), as well as an interim rate increase of $51.47 million (or 6.8 percent).[2]

Concurrent with its 2025 Rate Case, Xcel filed a Petition with a proposal to resolve its 2025 Rate Case in exchange for Commission approval of its rate case alternative, comprising:[3]

- Cost recovery through the State Energy Policy (SEP) Rider subject to true-up, for certain incremental costs, with a total baseline cost recovery of $46.3 million, with an effective date of January 1, 2026; and
- Approval to track property tax and damage prevention costs above or below the 2026 baseline amount for review in a future rate case proceeding.

In the summary of its Petition, the Company stated that its offer, if approved, will:

> Offer an alternative to litigating the rate case proceeding in Docket No. G002/GR-25-356, avoid a base rate increase for our natural gas customers, and free resources for stakeholders while preserving the financial health of the Company's Minnesota gas utility and its ability to continue providing safe, reliable, and affordable nature gas service.[4]

Xcel stated if the Commission approves these proposals, it will implement these terms, fully resolving the 2025 Rate Case, and thus avoiding contested case proceedings. But the Company also stated that if the Petition is not approved as proposed, it reserves the right to withdraw the Petition and proceed with the 2025 Rate Case in the ordinary course, with interim rates effective January 1, 2026. [5]

Per the Company's proposal, if the Commission approves the proposed rate case alternative, Xcel will not file another rate case until on or after October 30, 2026.

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[1] *In the Matter of the Application of Xcel Energy's Petition for Authority to Increase Natural Gas Rates in Minnesota*, October 31, 2025, Docket No. G002/GR-25-356, (eDockets) 202510-224501-01, (hereinafter "2025 Rate Case").
[2] *In the Matter of Petition of Northern States Power Company for Approval of SEP Rider Recovery with True-Up Mechanisms*, October 31, 2025, Docket No. G002/M-25-403, (eDockets) 202510-224514-01, (hereinafter "Petition"), at 1-2.
[3] Petition at 2.
[4] Petition at 1.
[5] Petition at 3.

II. PROCEDURAL BACKGROUND

October 31, 2025	Xcel filed its 2025 Rate Case.
October 31, 2025	Xcel filed its Petition for rate case alternative.
November 11, 2025	The Public Utilities Commission posted a Notice of Comment Period[6] for the Petition.

III. LEGAL ISSUE

The Petition proposes to recover costs for 2026 through the Company's existing State Energy Policy (SEP) rider. To begin, the Department questions whether it is permissible for these costs to be recovered through the SEP rider. The Department understands that the SEP rider is not a statutorily authorized rider like the fuel clause or purchase gas adjustment riders.[7] Rather, the Department believes that the term "SEP rider" is a catch-call for specific expenses for which the Legislature has expressly authorized recovery via "the automatic adjustment of charges" for utility service.[8] If the costs that the Company proposes to recover do not fall into one of these legislatively authorized categories, it is unclear to the Department that SEP rider recovery is permissible. The Department also notes that some of the statutes that originally gave rise to the SEP rider have expired or have been repealed.[9] **If the Company believes that there is express statutory support for recovering the proposed costs in a rider, the Department requests that the Company address it in Reply Comments.**

IV. DEPARTMENT ANALYSIS

The Petition proposes to establish a baseline amount for specific incremental costs for 2026 through the existing SEP Rider, which would be effective January 1, 2026. The incremental costs proposed for SEP Rider recovery are established by comparing the approved 2024 test year expenses[10] to the proposed 2026 test year expenses from the 2025 Rate Case. In addition to the rider, the Company requests a true-up mechanism for 2026 actual expenses, whether those expenses are higher or lower than estimated, for each of the components. This proposal would remain in effect until the Company's next gas rate case. The proposal results in an estimated SEP recovery of $46.3 million.

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[6] Public Utilities Commission, Notice of Comment Period, November 4, 2025, Docket No. G002/M-25-403, (eDockets) 202511-224658-01, (hereinafter "Notice").
[7] Minn. Stat. § 216B.16, subd. 7.
[8] *See, e.g.*, Minn. Stat. §§ 216C.052, subds. 2(d), subd. 3, 216B.1645, subds. 2(a), 4(a), 4(c).
[9] Minn. Stat. §§ 216C.052.
[10] *In the Matter of the Application of Northern States Power Company d/b/a Xcel Energy for Authority to Increase Rates for Natural Gas Service in Minnesota*, Public Utilities Commission, Order, March 5, 2025, Docket No. G002/GR-23-413, (eDockets) 20253-216076-01, (hereinafter "2023 Rate Case").

For context, a general rate case is the mechanism that the Commission uses to ensure reasonable, cost-based rates, and to encourage the utility to control costs between rate cases.

Thus, by design, the Commission's rules as to what utilities must file for general rate cases typically contain broad requirements about utility plant expenditures rather than highly specific requirements about a utility's system. The Commission's filing requirements are broad enough to allow for a holistic review of the representative costs of a utility's rate base, expenses and revenues and give the utility sufficient flexibility to manage its system and minimize costs.

True-ups occurring between rate cases can dilute that important incentive of managing costs and also distort appropriate cost apportionment between customer classes by assuming that a likely outdated cost apportionment remains reasonable. Therefore, it is difficult to ensure or conclude that rates resulting from a true-up are reasonable rates.

A. RESPONSE TO THE COMMISSION NOTICE

The Commission's Notice included eight topics open for comment, which the Department addresses individually below.

Due to the short comment period in the Notice, Responses to Department Information Requests will not be received by the Comments due date of November 12, 2025. The Department has requested additional financial information to help support the record, even though the comment period does not allow time for Response to Reply Comments.

A.1. Should the Commission approve Xcel's proposed SEP Rider Recovery to establish baseline for $46.3 million effective January 1, 2026, subject to true-up to actual 2026 expenses?

The Department recommends the Commission deny Xcel's proposed SEP Rider and True-Up Mechanism for 2026. As detailed in the sections below, the Department concludes the proposal for the SEP Rider lacks support based on the information provided.

As noted above, the incremental costs proposed for SEP Rider recovery are established by comparing the approved 2024 test year expenses from the 2023 Rate Case to the proposed 2026 test year expenses from the 2025 Rate Case. But the Company provided no support for its proposed expenses or actual expenses incurred for the proposed components to the SEP Rider**. The Department requests the Company provide, in Reply Comments, the 2024 actuals and the 2025 year-to-date expenses as of October 31, 2025, for each true-up component proposed in the Petition. Please provide this information on a total company and Minnesota Jurisdictional basis including support for the allocator used.**

A.2. Should the Commission approve Xcel's proposed capital true-up for 2026 through the existing SEP Rider?

The Department recommends the Commission deny Xcel's proposed capital true-up for 2026 through the SEP Rider.

The capital component of the SEP rider is the most significant driver, with 2026 forecasted SEP recovery of $25.5 million revenue requirement.[11] This baseline is established by comparing approved 2024 test year amounts to the forecasted 2026 capital revenue requirement. The Department acknowledges that the depreciation expense is consistent with the proposal made in the 2025 Rate Case and the depreciation rates proposed reflect the rates proposed in the Company's most recent Annual Depreciation Review.[12] The Department appreciates that the Company acknowledges if the depreciation rates proposed in the Annual Depreciation Review are not approved, Xcel confirms that the capital true-up would be calculated according to the depreciation rates approved.[13]

The Company identifies the capital investments with the most significant impact on increasing Xcel's baseline include fire suppression systems along with a new control room at the Company's gas plants and capacity upgrades to gas facilities.[14] There is, however, no record support provided by the Company for these capital investments. Not only do we not have support, but these costs have not been approved by the Commission. The Department cannot recommend approval to a true-up component without reviewing the 2024 actual expenses, reviewing the 2025 year-to-date expenses, and without having capital investments approved.

The Commission approved a "stay-out" proposal for Xcel - Electric in 2019 that included a capital true-up. The capital true-up approved in the 2019 Stay Out differs from the Petition proposal for the reasons below. First, the 2019 Stay Out capital true-up was asymmetrical, meaning the Company would refund ratepayers if it incurred lower capital related revenue requirements than forecasted for 2019, but the Company could not collect increased revenues for greater than forecasted capital expenditures. Second, the Commission concluded that 2019 Stay Out merely constituted a continuation of base rates established in the utility's most recent rate case under the multiyear rate plan statute.[15] The Commission did not approve new additions to rate base or changes to operating expenses based on information from outside the record of the utility's most recently completed rate case. Instead, the order appeared to recognize any such changes would warrant additional scrutiny and likely require a rate case.

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[11] Petition at 2, Petition Attachment A, and Petition Attachment B.
[12] *Petition of Annual Review of Remaining Lives and Depreciation Rates for Transmission, Distribution and General Accounts*, September 9, 2024, Docket No. G002/D-23-356, (eDockets) 20249-210074-03, (hereinafter "Annual Depreciation Review").
[13] Petition at 7.
[14] Petition at 7.
[15] *In the Matter of Northern States Power Company d/b/a Xcel Energy for Approval of True-Up Mechanisms*, Public Utilities Commission, Order, June 28, 2021, Docket No. E002/M-19-688, (eDockets) 20216-175457-01, (hereinafter "2019 Stay Out").

A.3. Should the Commission approve Xcel's proposed Property Tax True-Up for 2026 through the existing SEP Rider?

The Department recommends the Commission deny Xcel's proposed property tax true-up for 2026 through the SEP Rider and recommends Xcel continue to track its property tax true-up in the established property tax tracker.

The Company's 2026 forecasted SEP recovery for property tax is $10.5 million.[16] In a proposal for a new rider, the Department would like to review the 2024 actual expenses and 2025 year-to-date expenses, as requested in section A.1. Without support, the Department cannot recommend the property tax component for approval.

Xcel currently has a property tax tracker in place. As part of its proposal in this Petition, Xcel is requesting a modification to the existing property tax tracker. Xcel states:

> The Company proposes to move the property tax cost recovery to the SEP Rider for 2026, whereby forecasted increases in property taxes for 2026 would be implemented January 1, 2026, subject to true-up through the SEP Rider if actual results differ from estimates. Any tracker balance for years after 2026 would be subject to review in a future gas rate case.[17]

The Department interprets the Company's proposal as the 2026 actual property tax costs being trued-up in the proposed SEP Rider instead of the property tax tracker, if approved. But the Petition also states the following conflicting language:

> Consistent with the concept of the Company's current Property Tax true-up mechanism and to capture costs associated with its Damage Prevention work required by Minn. Stat. Chapter 216D and largely outside the Company's control, the Company further requests approval to track Property Tax and Damage Prevention costs above or below the 2026 baseline amount after the end of the 2026 calendar year, for review in a future rate proceeding.[18]

The Department would like the Company to clarify in Reply Comments what expense the Company is proposing to be reviewed in future rate cases.

[16] Petition at 2 and Petition Attachment A.
[17] Petition at 8.
[18] Petition at 2-3.

A.4. Should the Commission approve Xcel's proposed Labor Cost Recovery for 2026 through the existing SEP Rider?

The Department recommends the Commission deny Xcel's proposed labor cost recovery for 2026 through the SEP Rider. The Department believes the proposed labor costs would likely require modifications as addressed below.

Xcel is proposing to recover incremental gas distribution, plant, and transmission operations labor costs in the SEP Rider. The Company's 2026 forecasted SEP recovery for labor cost is $6.1 million.[19] Xcel asserts the increase is supported by wage increase for bargaining employees, an increase in the internal labor headcount to support infrastructure needs, and overall wage increases to acquire and retain employees.[20]

As stated above, a general rate case is the mechanism that the Commission uses to ensure reasonable, cost-based rates, and to encourage the utility to control costs between rate cases. Labor costs are a key component that is evaluated by the Department when utilities file a rate case. The Departments mainly evaluates labor costs for the following limitations and exclusions:

- The Commission has approved a 15 percent cap on short-term annual incentive (STI) compensation in several rate cases;
- The Commission consistently rejects recovery of long-term incentive (LTI) compensation costs; and
- The Commission limits recovery of executive compensation.

Since the Company did not provide any support for the requested labor costs which are the difference between the approved 2024 test year and the proposed 2026 test year**, the Department request the following from the Company in Reply Comments:**

- **For the 2026 proposed test year filed labor cost recovery of $30.1 million, please provide a breakout of this labor cost recovery, including amounts for STI compensation and percentage of base salary, LTI compensation, executive compensation, and wages.**
- **When comparing 2024 test year approved to 2026 test year proposed for labor cost recovery, please identify any amounts that were included in the 2026 test year request that were not approved in the 2024 test year approved, such as amounts over the cap for STI compensation, LTI compensation, and executive compensation.**

[19] Petition at 2 and Petition Attachment A.
[20] Petition at 8.

The Department will not recommend labor costs of $6.1 million for approval without reviewing actual 2024 and 2025 year-to-date expenses as discussed earlier, and what STI compensation, LTI compensation, and executive compensation are included in these requested labor costs.

A.5. Should the Commission approve Xcel's proposed Damage Prevention Recovery for 2026 through the existing SEP Rider?

The Department recommends the Commission deny Xcel's proposed damage prevention recovery for 2026 through the SEP Rider.

The Company's 2026 forecasted SEP recovery for damage prevention cost is $3.8 million.[21] The Company is also requesting to establish a tracker for true-up of future actual damage prevention costs. This program was established to comply with state and federal regulations such as the Minnesota Gopher State One Call (811) laws.[22] Its primary purpose is to reduce damage to buried facilities. Reasoning for the increase in program costs include vendor contract increases and an increase in locates across Xcel's service territory.[23]

While the Department acknowledges the importance of damage prevention costs for legal compliance, safety, and the third-party expenses outside the Company's control; this general assertion does not support the proposed incremental costs. Before recommending approval for any incremental costs, the Department would need to review the 2024 actual expenses and 2025 year-to-date expenses. But the Company did not provide any actual expenses incurred for the proposed components to the SEP Rider, nor did it support its 2026 forecast. As for the tracker, Xcel states:

> The Company further requests to establish a tracker for amounts incurred above or below the 2026 baseline amount after 2026, which would be subject to review in a future gas rate case.[24]

The Department interprets the Company's proposal as the 2026 actual damage prevention costs being trued-up in the proposed SEP Rider, if approved. Like the property tax true-up request**, the Department would like the Company to clarify in Reply Comments what expense the Company is proposing to be reviewed in future rate cases.**

A.6. Should the Commission approve Xcel's proposed Manufactured Gas Plant (MGP) Costs for 2026 through the existing SEP rider?

The Department recommends the Commission deny Xcel's proposed MGP recovery for 2026 through the SEP Rider.

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[21] Petition at 2 and Petition Attachment A.
[22] Minn. Stat. Ch. 216D (2025).
[23] Petition at 9.
[24] Petition at 9.

Xcel is proposing recovery in the SEP Rider for incremental manufactured gas plant (MGP) costs. The Company's 2026 forecasted SEP recovery for incremental MGP cost is $0.4 million.[25] MGP costs include expenses incurred to resolve environmental claims related to historical MGP sites.[26]

The Company asserts that actual MGP costs are difficult to predict on an annual basis. Xcel is responsible for five MGP sites in Minnesota. According to Xcel, several factors go into MGP expenses, including uncertainty over whether any insurance recoveries may offset the investigation and cleanup costs.[27]

Like the other components of the proposed SEP Rider, the Company does not provide any support for the incremental MGP costs. Before recommending approval for any incremental costs, the Department would need to review the 2024 actual expenses and 2025 year-to-date expenses, as well as support for the 2026 forecast. But the Company did not provide any actual expenses incurred for the proposed components to the SEP Rider**.**

A.7. Should the Commission approve Xcel's request to leave its base rates unchanged in 2026 and to withdraw its application for general increase in Docket No. G002/GR-25-365?

The Department recommends the Commission deny Xcel's request to leave its base rates unchanged in 2026 and withdraw it application for general increase in Docket No. G002/GR-25-365.

A.8. Are there other issues or concerns related to this matter?

A.8.1. Rate Design – Bill Impacts

The Department has concerns about the difference between the rate design used in the Company's rate cases verses the SEP Rider. In rate cases, the rate design has various ways to assign costs to customer classes. Costs are assigned using fixed charges, demand, and energy. But in the SEP Rider, all costs are assigned based entirely on sales. This is why the residential impact is only $2.69[28] per month under the SEP Rider but is $5.84[29] per month under the 2025 Rate Case for interim rates.

[25] Petition at 2 and Petition Attachment A.
[26] Petition at 9.
[27] Petition at 9.
[28] Petition at 7.
[29] Petition at 2.

Xcel provided Table 1 in the Petition, which the Department has included below:

Company Petition Table 1

Gas SEP Rate Factor	
Revenue Requirement Test Period	2026
Test Year Project Revenue Requirement	$46,329,264
Therms for Rate	1,227,923,665
Gas Rate/therm	$0.37730
Average Residential bill impact/Month	**$2.69**
Average Residential bill impact/Year	**$32.29**

The Department request the following from the Company in Reply Comments:

- **Please provide all calculations used to determine the average residential bill impact per month and the average residential bill impact per year, as shown in Petition Table 1.**
- **Please provide tables showing the SEP Rider impact on the following customer classes:**
  - **Small Commercial Firm**
  - **Large Commercial Firm**
  - **Small and Large Commercial Demand Billed**
  - **Small Interruptible**
  - **Medium and Large Interruptible**
  - **Transportation**
  - **Generation.**
- **Similar to Petition Table 1, for each customer class above, please provide the following:**
  - **Test year project revenue requirement**
  - **Therms for rate**
  - **Gas rate per therm**
  - **Average bill impact per month**
  - **Average bill impact per year.**

The Department is under the assumption that all the above customer classes would be impacted by the SEP Rider and the $0.37730 per therm SEP rate, however, Xcel should address this assumption if it is not correct.

V. DEPARTMENT RECOMMENDATIONS

Based on analysis of Xcel's Petition and the information in the record, the Department has provided the Minnesota Public Utilities Commission with recommendations as well as requests additional information from the Company in Reply Comments. These recommendations and requests are summarized below and correspond to the heading of Section III and subheadings of Section IV above.

III. LEGAL ISSUE

- The Department questions whether it is permissible for the proposed costs to be recovered through the SEP rider. If the Company believes that there is express statutory support for recovering the proposed costs in a rider, the Department requests that the Company address it in Reply Comments.

IV. DEPARTMENT ANALYSIS

A. RESPONSE TO COMMISSION NOTICE

- A.1. – *Should the Commission approve Xcel's proposed SEP Rider Recovery to establish baseline for $46.3 million effective January 1, 2026, subject to true-up to actual 2026 expenses?*
    - The Department recommends the Commission deny Xcel's proposed SEP Rider and True-Up Mechanism for 2026.
    - The Department requests the Company provide the 2024 actuals and the 2025 year-to-date expenses as of October 31, 2025, for each true-up component proposed in the Petition. Please provide this information on a total company and Minnesota Jurisdictional basis including support for the allocator used.

- A.2. - *Should the Commission approve Xcel's proposed capital true-up for 2026 through the existing SEP Rider?*
    - The Department recommends the Commission deny Xcel's proposed capital true-up for 2026 through the SEP Rider.

- A.3. – *Should the Commission approve Xcel's proposed Property Tax True-Up for 2026 through the existing SEP Rider?*
    - The Department recommends the Commission deny Xcel's proposed property tax true-up for 2026 through the SEP Rider.
    - Department requests the Company to clarify what property tax expense the Company is proposing to be reviewed in future rate cases.

- A.4. – *Should the Commission approve Xcel's proposed Labor Cost Recovery for 2026 through the existing SEP Rider?*
    - The Department recommends the Commission deny Xcel's proposed labor cost recovery for 2026 through the SEP Rider.
    - The Department request the Company provide:
        - For the 2026 proposed test year filed labor cost recovery of $30.1 million, please provide a breakout of this labor cost recovery, including amounts for short-term incentive compensation and percentage of base salary, long-term incentive compensation, executive compensation, and wages.
        - When comparing 2024 test year approved to 2026 test year proposed for labor cost recovery, please identify any amounts that were included in the 2026 test year request that were not approved in the 2024 test year approved, such as amounts over the cap for short-term incentive compensation, long-term incentive compensation, and executive compensation.

- A.5. – *Should the Commission approve Xcel's proposed Damage Prevention Recovery for 2026 through the existing SEP Rider?*
    - The Department recommends the Commission deny Xcel's proposed damage prevention recovery for 2026 through the SEP Rider.
    - Department requests the Company to clarify what damage prevention expense the Company is proposing to be reviewed in future rate cases.

- A.6. - *Should the Commission approve Xcel's proposed Manufactured Gas Plant (MGP) Costs for 2026 through the existing SEP rider?*
    - The Department recommends the Commission deny Xcel's proposed MGP recovery for 2026 through the SEP Rider.

- A.7. - *Should the Commission approve Xcel's request to leave its base rates unchanged in 2026 and to withdraw its application for general increase in Docket No. G002/GR-25-365?*
    - The Department recommends the Commission deny Xcel's request to leave its base rates unchanged in 2026 and withdraw it application for general increase in Docket No. G002/GR-25-365.

- A.8. - *Are there other issues and concerns related to this matter?*
    - A.8.1. The Department request the following from the Company:
        - Please provide all calculations used to determine the average residential bill impact per month and the average residential bill impact per year, as shown in Petition Table 1.
        - Please provide tables showing the SEP Rider impact on the following customer classes:
            - Small Commercial Firm

- Large Commercial Firm
- Small and Large Commercial Demand Billed
- Small Interruptible
- Medium and Large Interruptible
- Transportation
- Generation.

- Like Petition Table 1, for each customer class above, please provide the following:
  - Test year project revenue requirement
  - Therms for rate
  - Gas rate per therm
  - Average bill impact per month
  - Average bill impact per year.

The Department is under the assumption that all the above customer classes would be impacted by the SEP Rider and the $0.37730 per therm SEP rate, however, Xcel should address this assumption if it is not correct.

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
Comments

Docket No. G002/M-25-403

Dated this **12th** day of **November 2025**

/s/Sharon Ferguson

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
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2	Katherine	Arnold	katherine.arnold@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		No	M-25-403
3	Mara	Ascheman	mara.k.ascheman@xcelenergy.com	Xcel Energy		414 Nicollet Mall Fl 5 Minneapolis MN, 55401 United States	Electronic Service		No	M-25-403
4	Gail	Baranko	gail.baranko@xcelenergy.com	Xcel Energy		414 Nicollet Mall7th Floor Minneapolis MN, 55401 United States	Electronic Service		No	M-25-403
5	Sasha	Bergman	sasha.bergman@state.mn.us		Public Utilities Commission		Electronic Service		Yes	M-25-403
6	Elizabeth	Brama	ebrama@taftlaw.com	Taft Stettinius & Hollister LLP		2200 IDS Center 80 South 8th Street Minneapolis MN, 55402 United States	Electronic Service		No	M-25-403
7	Matthew	Brodin	mbrodin@allete.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	M-25-403
8	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	M-25-403
9	Robert S.	Carney, Jr.				4232 Colfax Ave. S. Minneapolis MN, 55409 United States	Paper Service		No	M-25-403
10	Olivia	Carroll	oliviac@cubminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota St W1360 St. Paul MN, 55101 United States	Electronic Service		No	M-25-403
11	Joey	Cherney	joey.cherney@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	445 Minnesota Street STE 1800 Saint Paul MN, 55101 United States	Electronic Service		No	M-25-403
12	John	Coffman	john@johncoffman.net	AARP		871 Tuxedo Blvd. St, Louis MO, 63119-2044 United States	Electronic Service		No	M-25-403
13	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	M-25-403

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
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15	George	Crocker	gwillc@nawo.org	North American Water Office		5093 Keats Avenue Lake Elmo MN, 55042 United States	Electronic Service		No	M-25-403
16	Ian M.	Dobson	ian.m.dobson@xcelenergy.com	Xcel Energy		414 Nicollet Mall, 401-8 Minneapolis MN, 55401 United States	Electronic Service		No	M-25-403
17	Richard	Dornfeld	richard.dornfeld@ag.state.mn.us		Office of the Attorney General - Department of Commerce	Minnesota Attorney General's Office 445 Minnesota Street, Suite 1800 Saint Paul MN, 55101 United States	Electronic Service		No	M-25-403
18	Brian	Edstrom	briane@cubminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota St Ste W1360 Saint Paul MN, 55101 United States	Electronic Service		No	M-25-403
19	Rebecca	Eilers	rebecca.d.eilers@xcelenergy.com	Xcel Energy		414 Nicollet Mall - 401 7th Floor Minneapolis MN, 55401 United States	Electronic Service		No	M-25-403
20	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	M-25-403
21	Edward	Garvey	garveyed@aol.com	Residence		32 Lawton St Saint Paul MN, 55102 United States	Electronic Service		No	M-25-403
22	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	M-25-403
23	Matthew B	Harris	matt.b.harris@xcelenergy.com	XCEL ENERGY		401 Nicollet Mall FL 8 Minneapolis MN, 55401 United States	Electronic Service		No	M-25-403
24	Annete	Henkel	mui@mnutilityinvestors.org	Minnesota Utility Investors		413 Wacouta Street #230 St.Paul MN, 55101 United States	Electronic Service		No	M-25-403
25	Valerie	Herring	vherring@taftlaw.com	Taft Stettinius & Hollister LLP		2200 IDS Center 80 S. Eighth Street Minneapolis MN, 55402 United States	Electronic Service		No	M-25-403

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
26	Katherine	Hinderlie	katherine.hinderlie@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	445 Minnesota St Suite 1400 St. Paul MN, 55101-2134 United States	Electronic Service		No	M-25-403
27	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	M-25-403
28	Richard	Johnson	rick.johnson@lawmoss.com	Moss & Barnett		150 S. 5th Street Suite 1200 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-403
29	Sarah	Johnson Phillips	sjphillips@stoel.com	Stoel Rives LLP		33 South Sixth Street Suite 4200 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-403
30	Nicolle	Kupser	nkupser@greatermngas.com	Greater Minnesota Gas, Inc.		1900 Cardinal Ln PO Box 798 Faribault MN, 55021 United States	Electronic Service		No	M-25-403
31	Peder	Larson	plarson@larkinhoffman.com	Larkin Hoffman Daly & Lindgren, Ltd.		8300 Norman Center Drive Suite 1000 Bloomington MN, 55437 United States	Electronic Service		No	M-25-403
32	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	M-25-403
33	Eric	Lipman	eric.lipman@state.mn.us		Office of Administrative Hearings	PO Box 64620 St. Paul MN, 55164-0620 United States	Electronic Service		No	M-25-403
34	Christine	Marquis	regulatory.records@xcelenergy.com	Xcel Energy		414 Nicollet Mall MN1180-07-MCA Minneapolis MN, 55401 United States	Electronic Service		No	M-25-403
35	Mary	Martinka	mary.a.martinka@xcelenergy.com	Xcel Energy Inc		414 Nicollet Mall 7th Floor Minneapolis MN, 55401 United States	Electronic Service		No	M-25-403
36	Stephen	Melchionne	stephen.melchionne@ag.state.mn.us		Office of the Attorney General - Department of Commerce	445 Minnesota Street, Ste. 1400 St. Paul MN, 55101 United States	Electronic Service		No	M-25-403
37	Kimberly	Middendorf	kimberly.middendorf@state.mn.us		Office of Administrative Hearings	PO Box 64620 600 Robert St N Saint Paul MN, 55164-0620 United States	Electronic Service		No	M-25-403

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38	David	Moeller	dmoeller@allete.com	Minnesota Power			Electronic Service		No	M-25-403
39	Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP		33 South Sixth St Ste 4200 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-403
40	Travis	Murray	travis.murray@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	445 Minnesota St Ste 1400 Saint Paul MN, 55101 United States	Electronic Service		No	M-25-403
41	David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency		220 South Sixth Street Suite 1300 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-403
42	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	M-25-403
43	Greg	Palmer	gpalmer@greatermngas.com	Greater Minnesota Gas, Inc.		1900 Cardinal Ln PO Box 798 Faribault MN, 55021 United States	Electronic Service		No	M-25-403
44	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	M-25-403
45	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	M-25-403
46	Joseph L	Sathe	jsathe@kennedy-graven.com	Kennedy & Graven, Chartered		150 S 5th St Ste 700 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-403
47	Elizabeth	Schmiesing	eschmiesing@winthrop.com	Winthrop & Weinstine, P.A.		225 South Sixth Street Suite 3500 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-403
48	Peter	Scholtz	peter.scholtz@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	Suite 1400 445 Minnesota Street St. Paul MN, 55101-2131 United States	Electronic Service		No	M-25-403
49	Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates		7400 Lyndale Ave S Ste 190 Richfield MN, 55423 United States	Electronic Service		No	M-25-403
50	Suzanne	Todnem	suzanne.todnem@state.mn.us		Office of Administrative Hearings	600 Robert St N PO Box 64620 St. Paul MN, 55164 United States	Electronic Service		No	M-25-403

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
51	Amelia	Vohs	avohs@mncenter.org	Minnesota Center for Environmental Advocacy		1919 University Avenue West Suite 515 St. Paul MN, 55104 United States	Electronic Service		No	M-25-403
52	Joseph	Windler	jwindler@winthrop.com	Winthrop & Weinstine		225 South Sixth Street, Suite 3500 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-403