



414 Nicollet Mall
Minneapolis, MN 55401

August 30, 2019

—Via Electronic Filing—

Daniel P. Wolf
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101

RE: SUPPLEMENTAL COMMENTS
ACQUISITION OF THE MANKATO ENERGY CENTER (MEC)
DOCKET NO. IP6949, E002/PA-18-702

Dear Mr. Wolf:

Northern States Power Company, doing business as Xcel Energy, submits to the Minnesota Public Utilities Commission these Supplemental Comments in response to the Commission's August 20, 2019 Notice Requesting Supplement Comments.

Through its Supplemental Notice, the Commission seeks additional comment on two questions that pertain to the scenario where Xcel Energy's petition to have Northern States Power (NSP) acquire MEC is denied, and the units are instead purchased by an unregulated Xcel affiliate that would assume Southern Power's rights and obligations under the extant PPAs. Specifically, the Commission sought further comment as to:

- What legal requirements apply and what actions would Xcel be required to take before an Xcel affiliate could purchase the Mankato Energy Center (MEC) and assume the PPA to provide power to Xcel's regulated operations; and
- Whether prior Commission approval of an affiliated interest agreement required?

While we continue to note that our strong preference is to own the MEC assets as a regulated asset, we address each question in turn to facilitate Commission consideration of this alternative.

I. Legal Requirements for Acquisition by a FERC-regulated Xcel Affiliate

If Xcel Energy were to close the transaction through the use of an Xcel Energy affiliate, the affiliate would acquire the equity interests in Mankato Energy Center, LLC (MEC I) and Mankato Energy Center II, LLC (MEC II). MEC I and MEC II would then continue selling to NSPM under the existing PPAs. This would require Xcel to receive approval under Section 203 of the Federal Power Act (FPA) prior to the close of the transaction. While NSP has already obtained Section 203 approval for the regulated acquisition contemplated by NSPM, the aforementioned structural changes to the transaction would require a new or amended Section 203 filing with FERC. Xcel would also need to obtain an affiliated interest approval from the Commission, as discussed in Section II below.

Xcel Energy's current agreement with Southern Power includes a mutual termination provision effective September 27, 2019. As such, absent an extension, FERC section 203 approval of this affiliate option would be needed by that contractual deadline. Given that FERC typically requires 60 to 90 days to act on a Section 203 filing, the Company is working with Southern Power, and Southern Power has indicated it is willing to enter an agreement to provide an extension of that deadline solely for the purpose of obtaining FERC approvals. In other words, the original contractual deadline to close by September 27, 2019 remains the deadline by which the Company must receive this Commission's approval for NSPM to own MEC as a utility asset. The extension would be triggered only in the event of a Commission denial to provide the Company sufficient time to pursue the necessary FERC approvals to take the asset to an unregulated affiliate.

A list of the necessary approvals, and what they entail, are included below:

- Federal Power Act (FPA) Section 203 approval: This approval allows for the acquisition of MEC I and II by an affiliate of NSPM rather than by NSPM itself, as FERC has currently authorized.
- FPA Section 205 affiliate sale approval: This approval authorizes MEC I and MEC II to continue making power sales under their existing PPAs to NSPM.

- Acceptance of a change in status notice for MEC I and MEC II's market based rate authority: This is needed in order to permit MEC I and MEC II to continue making sales under their PPAs to NSPM. The notice of change in status would need to be filed within 30 days after closing.

The Company may also seek a waiver of FERC affiliate restrictions to the extent necessary to ensure that continued information sharing about plant operations, as required by the current PPAs, can continue so that NSPM can efficiently control the asset and properly bid it into the MISO market pursuant to the terms of the current contract between Southern Power and NSPM.

We note that FERC has well-established precedent in the area of a market-regulated affiliate purchasing an asset that is currently under contract with a regulated utility, so long as the original PPA (in this case there are two) was procured pursuant to an arm's length transaction and the purchase does not change the contractual rights of either the purchaser or seller. As noted above, the FERC has typically authorized the suite of approvals outlined above in a 60 to 90-day timeframe.

The Company would also need to obtain an affiliate interest approval from the Commission but, as discussed further in Section III below, this approval could occur after the close of the transaction. An affiliate interest approval is necessary because the FERC-regulated Xcel affiliate would be stepping into the shoes of Southern Power and selling power to NSPM pursuant to the terms of the existing PPAs.

II. Company Commitments

Under either scenario, the Company is prepared to institute various customer protections to ensure the Company's FERC-regulated affiliate is not advantaged by its affiliation to NSPM. Specifically:

- the MEC entities will have employee separation vis-à-vis NSPM; (the power plant employees will be employed by one of the new entities);
- to the extent Xcel Energy Services employees support the affiliate, they will use direct charging as required;
- the affiliate will use the standard affiliate cost allocation from the most current Xcel Energy Cost Allocation Agreement;

- if either affiliate wishes to continue to sell power to NSPM after the expiration of the existing PPAs, they will do so only by bidding the units into a competitive bidding process that uses an independent evaluator and if selected, any new contract resulting from this process will require Commission approval.

III. Timing of Minnesota Affiliate Interest Approval

As discussed above, although Commission approval of an affiliated interest agreement is required for regulatory purposes and ultimately cost recovery, it is not a pre-requisite for that agreement to be legally effective as between the parties. That has been the rule for over twenty years when – in 1998 – the Commission concluded that Minn. Stat. § 216B.48 requires Commission review of all affiliated interest agreements for “regulatory purposes” only – *i.e.*, as it specifically relates to rate recovery.

The governing statute for affiliate approvals is Minn. Stat. § 216B.48, subd. 3, which provides:

[n]o contract or arrangement... for the purchase, sale, lease, or exchange of any ... service, property, right, or thing, ... is valid or effective unless and until the contract or arrangement has received the written approval of the [C]ommission.

The Commission initially promulgated rules under this statute that, among other things, stated that affiliated interest contracts that lacked Commission approval would be “null and void.”¹ In 1997, however, the Commission undertook a review of this rule to examine its effectiveness.² Many commenters sought additional flexibility in order to effectively engage in commercial transactions, which often require decisive action before a Commission approval could reasonably be obtained.³

In that Docket, the Commission ordered a repeal of Minn. R. 7825.2100 and the associated “null and void” language. In its stead, the Commission adopted a series of procedures for review of affiliate interest agreements. Most importantly, the Commission held:

¹ Minn. R. 7825.2100 (repealed).

² Docket No. E, G-999/CI-97-1462.

³ Docket No. E, G-999/CI-98-651.

It is possible to interpret the statute [Minn. Stat. § 216B.48] as preventing an effective date for an affiliate agreement that predates Commission approval. Such an interpretation would, in effect, obstruct the intention of ... assur[ing] the commercial viability of affiliate contracts prior to Commission approval to assure that they become effective for operational purposes upon execution.

However, the Commission does not find this statutory interpretation appropriate in the circumstances. The Commission finds it more reasonable to understand that the invalidity for non-approved contracts prescribed by a statute appearing in the Public Utilities Chapter of Minnesota Statutes (Chapter 216B), is limited to regulatory concerns.⁴

The Commission reasoned that this interpretation of the statutory mandate “*will allow parties to an affiliate interest transaction to proceed under an affiliate contract* but will hold such parties at risk with respect to rate recovery.”⁵

Since this seminal Order, the Commission has consistently applied the modern interpretation of Minn. Stat. § 216B.48 to affiliate transactions and has therefore not required that affiliate interest agreements be approved by the Commission prior to their effectiveness as between the parties.⁶

⁴ *In the Matter of a Commission Investigation into Procedures for Reviewing Public Utility Affiliated Interest Contracts and Arrangements*, Docket No. E, G-999/CI-98-651, ORDER INITIATING REPEAL OF RULE, GRANTING GENERIC VARIANCE, AND CLARIFYING INTERNAL OPERATING PROCEDURES at p. 7 (Sept. 14, 1998).

⁵ *Id.* (emphasis added).

⁶ *In the Matter of Request for Approval of a New Administrative Services Agreement Between Northern States Power Company and Xcel Energy Transmission Development Company, LLC and Xcel Energy Southwest Transmission Company, LLC*, Docket No. E-002/AI-14-759, Administrative Order (Service Date: Aug. 3, 2015); *In the Matter of Interstate Power and Light Company’s Petition for Approval of a Common Facilities Capacity Agreement with its Affiliate, Franklin County Wind, LLC, et. al.* Docket Nos. E,G001/AI-12-32, E,G001/AI-12-187, E,G001/AI-12-192, E,G001/AI-12-792, E,G001/AI-12-1157, ORDER REQUIRING FURTHER FILINGS (April 16, 2013); *In the Matter of an Investigation into Aquilla, Inc.’s Sale of its Shipper Services*, Docket No. G-007/CI-03-277, ORDER FINDING

For instance, the Company's service agreements with its affiliate Xcel Energy Transmission Development Company, LLC and its affiliate Xcel Energy Southwest Transmission Company, LLC were entered into and effective on August 28, 2014 but not filed with the Commission until September 3, 2014 and were not approved by the Commission until August 3, 2015.⁷ This demonstrates the effectiveness of the procedures put in place by the Commission almost 20 years ago.

Similarly, here, the Company can, consistent with State statute and Commission rule, close the transaction, upon receipt of FERC approvals and continue to make the PPA payments prior to the Commission's approval of its affiliated interest petition. If the Company were ultimately unable to obtain the necessary affiliated interest approvals, the amounts collected from customers up to that point would be subject to refund.

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 me at allen.krug@xcelenergy.com or (612) 330-6270 if you have any questions regarding this filing.

Sincerely,

/s/

ALLEN D. KRUG
ASSOCIATE VICE PRESIDENT, STATE REGULATORY POLICY
RATES AND REGULATORY AFFAIRS

cc: Service List

JURISDICTION AND REQUIRING AQUILLA TO REQUEST APPROVAL OF THE SALE OF ITS SHIPPER SERVICES OPERATION (Nov. 21, 2003).

⁷ *In the Matter of Request for Approval of a New Administrative Services Agreement Between Northern States Power Company and Xcel Energy Transmission Development Company, LLC and Xcel Energy Southwest Transmission Company, LLC*, Docket No. E-002/AI-14-759, Administrative Order (Service Date: Aug. 3, 2015).

CERTIFICATE OF SERVICE

I, Lynnette Sweet, hereby certify that I have this day served copies or summaries of the foregoing document on the attached list of persons.

xx by depositing a true and correct copy thereof, properly enveloped
with postage paid in the United States Mail at Minneapolis, Minnesota

xx electronic filing

Docket No. IP6949,E002/PA-18-702

Dated this 30th day of August 2019

/s/

Lynnette Sweet
Regulatory Administrator

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
David	Aafedt	daafedt@winthrop.com	Winthrop & Weinstine, P.A.	Suite 3500, 225 South Sixth Street Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_18-702_Official Service List
Jorge	Alonso	jorge.alonso@state.mn.us	Public Utilities Commission	121 7th Place East Suite 350 St. Paul, MN 55101	Electronic Service	No	OFF_SL_18-702_Official Service List
Christopher	Anderson	canderson@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022191	Electronic Service	No	OFF_SL_18-702_Official Service List
Alison C	Archer	aarcher@misoenergy.org	MISO	2985 Ames Crossing Rd Eagan, MN 55121	Electronic Service	No	OFF_SL_18-702_Official Service List
Mara	Ascheman	mara.k.ascheman@xcelenergy.com	Xcel Energy	414 Nicollet Mall Fl 5 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_18-702_Official Service List
Gail	Baranko	gail.baranko@xcelenergy.com	Xcel Energy	414 Nicollet Mall 7th Floor Minneapolis, MN 55401	Electronic Service	No	OFF_SL_18-702_Official Service List
Tracy	Bertram	tbertram@ci.becker.mn.us		12060 Sherburne Ave Becker City Hall Becker, MN 55308-4694	Electronic Service	No	OFF_SL_18-702_Official Service List
James J.	Bertrand	james.bertrand@stinson.com	STINSON LLP	50 S 6th St Ste 2600 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_18-702_Official Service List
Michael J.	Bull	mbull@mncee.org	Center for Energy and Environment	212 Third Ave N Ste 560 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_18-702_Official Service List
James	Canaday	james.canaday@ag.state.mn.us	Office of the Attorney General-RUD	Suite 1400 445 Minnesota St. St. Paul, MN 55101	Electronic Service	No	OFF_SL_18-702_Official Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Thomas	Carlson	thomas.carlson@edf-re.com	EDF Renewable Energy	10 2nd St NE Ste. 400 Minneapolis, Minnesota 55413	Electronic Service	No	OFF_SL_18-702_Official Service List
John	Coffman	john@johncoffman.net	AARP	871 Tuxedo Blvd. St. Louis, MO 63119-2044	Electronic Service	No	OFF_SL_18-702_Official Service List
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1800 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_18-702_Official Service List
Riley	Conlin	riley.conlin@stoel.com	Stoel Rives LLP	33 S. 6th Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_18-702_Official Service List
George	Crocker	gwillc@nawo.org	North American Water Office	PO Box 174 Lake Elmo, MN 55042	Electronic Service	No	OFF_SL_18-702_Official Service List
Patricia	DeBleeckere	tricia.debleeckere@state.mn.us	Public Utilities Commission	Suite 350 121 Seventh Place East St. Paul, MN 55101	Electronic Service	No	OFF_SL_18-702_Official Service List
James	Denniston	james.r.denniston@xcelenergy.com	Xcel Energy Services, Inc.	414 Nicollet Mall, Fifth Floor Minneapolis, MN 55401	Electronic Service	No	OFF_SL_18-702_Official Service List
Scott F	Dunbar	sdunbar@keyesfox.com	Keyes & Fox LLP	1580 Lincoln St Ste 880 Denver, CO 80203	Electronic Service	No	OFF_SL_18-702_Official Service List
Rebecca	Eilers	rebecca.d.eilers@xcelenergy.com	Xcel Energy	414 Nicollet Mall - 401 7th Floor Minneapolis, MN 55401	Electronic Service	No	OFF_SL_18-702_Official Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
John	Farrell	jfarrell@ilsr.org	Institute for Local Self-Reliance	1313 5th St SE #303 Minneapolis, MN 55414	Electronic Service	No	OFF_SL_18-702_Official Service List
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 551012198	Electronic Service	No	OFF_SL_18-702_Official Service List
Mike	Fiterman	mikefiterman@libertydiversified.com	Liberty Diversified International	5600 N Highway 169 Minneapolis, MN 55428-3096	Electronic Service	No	OFF_SL_18-702_Official Service List
William	Flynn	flynnw@ballardspahr.com	Ballard Spahr, LLP	80 South 8th Street Minneapolis, MN 55402	Electronic Service	No	OFF_SL_18-702_Official Service List
Edward	Garvey	garveyed@aol.com	Residence	32 Lawton St Saint Paul, MN 55102	Electronic Service	No	OFF_SL_18-702_Official Service List
Edward	Garvey	edward.garvey@AESLconsulting.com	AESL Consulting	32 Lawton St Saint Paul, MN 55102-2617	Electronic Service	No	OFF_SL_18-702_Official Service List
Janet	Gonzalez	Janet.gonzalez@state.mn.us	Public Utilities Commission	Suite 350 121 7th Place East St. Paul, MN 55101	Electronic Service	No	OFF_SL_18-702_Official Service List
J Drake	Hamilton	hamilton@fresh-energy.org	Fresh Energy	408 St Peter St Saint Paul, MN 55101	Electronic Service	No	OFF_SL_18-702_Official Service List
Kimberly	Hellwig	kimberly.hellwig@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_18-702_Official Service List
Annete	Henkel	mui@mutilityinvestors.org	Minnesota Utility Investors	413 Wacouta Street #230 St. Paul, MN 55101	Electronic Service	No	OFF_SL_18-702_Official Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Patrick	Hentges	phentges@mankatomn.gov	City Of Mankato	P.O. Box 3368 Mankato, MN 560023368	Electronic Service	No	OFF_SL_18-702_Official Service List
Wallace	Hilke	hilke@ballardspahr.com	Ballard Spahr LLP	2000 IDS Center 80 South Eighth St Minneapolis, MN 55402	Electronic Service	No	OFF_SL_18-702_Official Service List
Bob	Hoffman	interimCEO@greatermank ato.com	Greater Mankato Growth	1961 Premier Dr Ste 100 Mankato, MN 56001	Electronic Service	No	OFF_SL_18-702_Official Service List
Michael	Hoppe	il23@mtm.org	Local Union 23, I.B.E.W.	932 Payne Avenue St. Paul, MN 55130	Electronic Service	No	OFF_SL_18-702_Official Service List
Alan	Jenkins	aj@jenkinsatlaw.com	Jenkins at Law	2265 Roswell Road Suite 100 Marietta, GA 30062	Electronic Service	No	OFF_SL_18-702_Official Service List
Patrice	Jensen	patrice.jensen@state.mn.u s	MN Pollution Control Agency	520 Lafayette Rd N St. Paul, MN 55155	Electronic Service	No	OFF_SL_18-702_Official Service List
Linda	Jensen	linda.s.jensen@ag.state.m n.us	Office of the Attorney General-DOC	1800 BRM Tower 445 Minnesota Street St. Paul, MN 551012134	Electronic Service	No	OFF_SL_18-702_Official Service List
Richard	Johnson	Rick.Johnson@lawmoss.co m	Moss & Barnett	150 S. 5th Street Suite 1200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_18-702_Official Service List
Sarah	Johnson Phillips	sarah.phillips@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_18-702_Official Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Mark J.	Kaufman	mkaufman@ibewlocal949.org	IBEW Local Union 949	12908 Nicollet Avenue South Burnsville, MN 55337	Electronic Service	No	OFF_SL_18-702_Official Service List
Hank	Koegel	hank.koegel@edf-re.com	EDF Renewable Eenergy	10 2nd St NE Ste 400 Minneapolis, MN 55413-2652	Electronic Service	No	OFF_SL_18-702_Official Service List
Thomas	Koehler	TGK@IBEW160.org	Local Union #160, IBEW	2909 Anthony Ln St Anthony Village, MN 55418-3238	Electronic Service	No	OFF_SL_18-702_Official Service List
Frank	Kohlasch	frank.kohlasch@state.mn.us	MN Pollution Control Agency	520 Lafayette Rd N. St. Paul, MN 55155	Electronic Service	No	OFF_SL_18-702_Official Service List
Michael	Krikava	mkrikava@briggs.com	Briggs And Morgan, P.A.	2200 IDS Center 80 S 8th St Minneapolis, MN 55402	Electronic Service	No	OFF_SL_18-702_Official Service List
Peder	Larson	plarson@larkinhoffman.com	Larkin Hoffman Daly & Lindgren, Ltd.	8300 Norman Center Drive Suite 1000 Bloomington, MN 55437	Electronic Service	No	OFF_SL_18-702_Official Service List
Douglas	Larson	dlarson@dakotaelectric.com	Dakota Electric Association	4300 220th St W Farmington, MN 55024	Electronic Service	No	OFF_SL_18-702_Official Service List
Thomas	Lovett, IV	Lovett@ballardspahr.com	Ballard Spahr LLP	2000 IDS Center 80 South Eighth Street Minneapolis, MN 55402	Electronic Service	No	OFF_SL_18-702_Official Service List
Alice	Madden	alice@communitypowermn.org	Community Power	2720 E 22nd St Minneapolis, MN 55406	Electronic Service	No	OFF_SL_18-702_Official Service List
Peter	Madsen	peter.madsen@ag.state.mn.us	Office of the Attorney General-DOC	Bremer Tower, Suite 1800 445 Minnesota Street St. Paul, Minnesota 551017741	Electronic Service	No	OFF_SL_18-702_Official Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Kavita	Maini	kmaini@wi.rr.com	KM Energy Consulting LLC	961 N Lost Woods Rd Oconomowoc, WI 53066	Electronic Service	No	OFF_SL_18-702_Official Service List
Pam	Marshall	pam@energycents.org	Energy CENTS Coalition	823 7th St E St. Paul, MN 55106	Electronic Service	No	OFF_SL_18-702_Official Service List
Mary	Martinka	mary.a.martinka@xcelener gy.com	Xcel Energy Inc	414 Nicollet Mall 7th Floor Minneapolis, MN 55401	Electronic Service	No	OFF_SL_18-702_Official Service List
Daryl	Maxwell	dmaxwell@hydro.mb.ca	Manitoba Hydro	360 Portage Ave FL 16 PO Box 815, Station Main Winnipeg, Manitoba R3C 2P4 Canada	Electronic Service	No	OFF_SL_18-702_Official Service List
Brian	Meloy	brian.meloy@stinson.com	STINSON LLP	50 S 6th St Ste 2600 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_18-702_Official Service List
Joseph	Meyer	joseph.meyer@ag.state.mn .us	Office of the Attorney General-RUD	Bremer Tower, Suite 1400 445 Minnesota Street St Paul, MN 55101-2131	Electronic Service	No	OFF_SL_18-702_Official Service List
David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022093	Electronic Service	No	OFF_SL_18-702_Official Service List
Andrew	Moratzka	andrew.moratzka@stoel.co m	Stoel Rives LLP	33 South Sixth St Ste 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_18-702_Official Service List
Alan	Muller	alan@greendel.org	Energy & Environmental Consulting	1110 West Avenue Red Wing, MN 55066	Electronic Service	No	OFF_SL_18-702_Official Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Carl	Nelson	cnelson@mncee.org	Center for Energy and Environment	212 3rd Ave N Ste 560 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_18-702_Official Service List
J	Newberger	Jnewberger1@yahoo.com	State Rep	14225 Balsam Blvd Becker, MN 55308	Electronic Service	No	OFF_SL_18-702_Official Service List
David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency	220 South Sixth Street Suite 1300 Minneapolis, Minnesota 55402	Electronic Service	No	OFF_SL_18-702_Official Service List
Carol A.	Overland	overland@legalelectric.org	Legalelectric - Overland Law Office	1110 West Avenue Red Wing, MN 55066	Electronic Service	No	OFF_SL_18-702_Official Service List
Jeff	Oxley	jeff.oxley@state.mn.us	Office of Administrative Hearings	600 North Robert Street St. Paul, MN 55101	Electronic Service	No	OFF_SL_18-702_Official Service List
Greg	Pruszinske	gpruszinske@ci.becker.mn.us	City of Becker	PO Box 250 12060 Sherburne Ave Becker, MN 55308	Electronic Service	No	OFF_SL_18-702_Official Service List
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_18-702_Official Service List
Kevin	Reuther	kreuther@mncenter.org	MN Center for Environmental Advocacy	26 E Exchange St, Ste 206 St. Paul, MN 551011667	Electronic Service	No	OFF_SL_18-702_Official Service List
Amanda	Rome	amanda.rome@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 5 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_18-702_Official Service List
Richard	Savelkoul	rsavelkoul@martinsquires.com	Martin & Squires, P.A.	332 Minnesota Street Ste W2750 St. Paul, MN 55101	Electronic Service	No	OFF_SL_18-702_Official Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Larry L.	Schedin	Larry@LLSResources.com	LLS Resources, LLC	332 Minnesota St, Ste W1390 St. Paul, MN 55101	Electronic Service	No	OFF_SL_18-702_Official Service List
Jacob J.	Schlesinger	j Schlesinger@keyesfox.com	Keyes & Fox LLP	1580 Lincoln St Ste 880 Denver, CO 80203	Electronic Service	No	OFF_SL_18-702_Official Service List
Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates	7400 Lyndale Ave S Ste 190 Richfield, MN 55423	Electronic Service	No	OFF_SL_18-702_Official Service List
Bria	Shea	bria.e.shea@xcelenergy.com	Xcel Energy	414 Nicollet Mall Minneapolis, MN 55401	Electronic Service	No	OFF_SL_18-702_Official Service List
Joshua	Smith	joshua.smith@sierraclub.org		85 Second St FL 2 San Francisco, California 94105	Electronic Service	No	OFF_SL_18-702_Official Service List
Jessie	Smith	jseim@pic.org	Prairie Island Indian Community	5636 Sturgeon Lake Rd Welch, MN 55089	Electronic Service	No	OFF_SL_18-702_Official Service List
Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.	76 W Kellogg Blvd St. Paul, MN 55102	Electronic Service	No	OFF_SL_18-702_Official Service List
Beth H.	Soholt	bsoholt@windonthewires.org	Wind on the Wires	570 Asbury Street Suite 201 St. Paul, MN 55104	Electronic Service	No	OFF_SL_18-702_Official Service List
Anna	Sommer	ASommer@energyfuturesgroup.com	Energy Futures Group	PO Box 692 Canton, NY 13617	Electronic Service	No	OFF_SL_18-702_Official Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Mark	Spurr	mspur@fvbenergy.com	International District Energy Association	222 South Ninth St., Suite 825 Minneapolis, Minnesota 55402	Electronic Service	No	OFF_SL_18-702_Official Service List
Sean	Stalpes	sean.stalpes@state.mn.us	Public Utilities Commission	121 E. 7th Place, Suite 350 Saint Paul, MN 55101-2147	Electronic Service	No	OFF_SL_18-702_Official Service List
Byron E.	Starns	byron.starns@stinson.com	STINSON LLP	50 S 6th St Ste 2600 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_18-702_Official Service List
James M	Strommen	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered	200 S 6th St Ste 470 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_18-702_Official Service List
Robert	Stupar	rob.stupar@enel.com	Enel Green Power North America, Inc.	816 Connecticut Avenue NW Suite 600 Washington, DC 20006	Electronic Service	No	OFF_SL_18-702_Official Service List
Eric	Swanson	eswanson@winthrop.com	Winthrop & Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_18-702_Official Service List
Lynnette	Sweet	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_18-702_Official Service List
Douglas	Tiffany	tiffa002@umn.edu	University of Minnesota	316d Ruttan Hall 1994 Buford Avenue St. Paul, MN 55108	Electronic Service	No	OFF_SL_18-702_Official Service List
Thomas	Tynes	jjazynka@energyfreedomcoalition.com	Energy Freedom Coalition of America	101 Constitution Ave NW Ste 525 East Washington, DC 20001	Electronic Service	No	OFF_SL_18-702_Official Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Lisa	Veith	lisa.veith@ci.stpaul.mn.us	City of St. Paul	400 City Hall and Courthouse 15 West Kellogg Blvd. St. Paul, MN 55102	Electronic Service	No	OFF_SL_18-702_Official Service List
Julie	Voeck	julie.voeck@nee.com	NextEra Energy Resources, LLC	700 Universe Blvd Juno Beach, FL 33408	Electronic Service	No	OFF_SL_18-702_Official Service List
Kathryn E.	Wendt	wendtk@ballardspahr.com	Ballard Spahr, LLP	80 South Eighth St Minneapolis, MN 55402	Electronic Service	No	OFF_SL_18-702_Official Service List
Heidi	Whidden	hwhidden@calpine.com	Calpine Corporation	500 Delaware Ave Wilmington, DE 19801	Electronic Service	No	OFF_SL_18-702_Official Service List
Scott M.	Wilensky	scott.wilensky@xcelenergy.com	Xcel Energy	7th Floor 414 Nicollet Mall Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_18-702_Official Service List
Samantha	Williams	swilliams@nrdc.org	Natural Resources Defense Council	20 N. Wacker Drive Ste 1600 Chicago, IL 60606	Electronic Service	No	OFF_SL_18-702_Official Service List
Joseph	Windler	jwindler@winthrop.com	Winthrop & Weinstine	225 South Sixth Street, Suite 3500 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_18-702_Official Service List
Daniel P	Wolf	dan.wolf@state.mn.us	Public Utilities Commission	121 7th Place East Suite 350 St. Paul, MN 551012147	Electronic Service	Yes	OFF_SL_18-702_Official Service List
Patrick	Zomer	Patrick.Zomer@lawmoss.com	Moss & Barnett a Professional Association	150 S. 5th Street, #1200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_18-702_Official Service List