

1580 Lincoln St., Suite 880
Denver, CO 80209
(720) 643-5920

August 30, 2019

VIA ELECTRONIC SERVICE

Daniel P. Wolf
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East Suite 350
St Paul, MN 55101-2147

RE: Docket No. IP6949, E002/PA-18-702
In the Matter of Acquisition of the Mankato Energy Center (MEC)

Dear Sir:

In connection to the above-captioned docket, enclosed please find *The Citizens Utility Board of Minnesota's Legal Comments Regarding Affiliate Transactions* on behalf of The Citizens Utility Board (CUB) of Minnesota and Certificate of Service.

Thank you for your attention to this matter.

Sincerely,

s/ Jacob J. Schlesinger

Jacob J. Schlesinger
KEYES & FOX, LLP
1580 Lincoln St., Suite 880
Denver, CO 80203
Telephone: (720) 639-2190
Email: jschlesinger@keyesfox.com

ATTORNEY FOR CUB

STATE OF MINNESOTA

MINNESOTA PUBLIC UTILITIES COMMISSION

Katie Sieben	Chair
Dan Lipschultz	Commissioner
Valerie Means	Commissioner
Matthew Schuerger	Commissioner
John Tuma	Commissioner

In the Matter of Xcel Energy's
Petition for Approval of the
Acquisition of the Mankato Energy
Center (MEC)

DOCKET NO. IP6949, E002/PA-18-702

The Citizens Utility Board of Minnesota's Legal Comments Regarding Affiliate Transactions

I. Introduction and Overview

The Citizens Utility Board of Minnesota ("CUB") appreciates the opportunity offered by the Public Utilities Commission ("PUC" or "Commission") to submit comments to address Northern States Power Company's, doing business as Xcel Energy ("Xcel" or "Company"), August 1, 2019 letter informing the Commission of the Company's intention to move forward with the transaction through an unregulated subsidiary should its Petition for Approval of the Mankato Energy Center ("MEC") ("Petition") be denied. In response, the Commission requested that docket participants and parties address the following legal questions:

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? Is prior Commission approval of an affiliated interest agreement required?¹

¹ Notice at p. 1, issued on August 20, 2019.

As discussed below, Minnesota law requires Xcel to apply for and get explicit Commission approval of any contract with an affiliated entity.² Such approval will be required for the MEC power purchase agreements (“PPAs”) if an Xcel affiliate is going to purchase MEC and “step into the shoes of Southern Power” with regard to the PPAs.³ Assuming that the Xcel affiliate would simply adopt the same terms that the Commission has already approved for the MEC PPAs, expedited approval of the affiliate transactions may be appropriate. The Commission has already determined that the MEC PPAs are prudent and in the public interest through earlier proceedings.⁴

Consistent with its July 26, 2019 Supplemental Comments, CUB maintains that Xcel has not met its burden of proof to demonstrate that it is prudent and in the public interest to purchase MEC as a rate-based asset.⁵ CUB strongly believes that the Commission should evaluate the proposed regulated asset purchase and all of the risks and benefits it may entail in the context of the larger integrated resource planning (“IRP”) process.⁶ This is because any purchase of MEC has the potential to unfairly shift risks to ratepayers due to considerable uncertainty in the larger IRP context.⁷ Xcel’s proposal to acquire MEC as a regulated asset would require significant ratepayer-funded investment and would shift many of the IPP-borne risks to Xcel’s customers. Further, as pointed out by the Office of Attorney General in its March 5, 2019 Comments, acquisition of MEC results in increased short-term costs.⁸ The Company’s cost savings analysis relies on long-

² Minn. Stat 248 Minn. Stat. Ann. § 216B.48.

³ Xcel Letter at p. 3. August 1, 2019.

⁴ See, Commission Order E-002/M-04-451. August 17, 2004, and Commission Order. E-002/CN-12-1240. February 5, 2015.

⁵ CUB Supplemental Comments at p. 1. July 26, 2019.

⁶ *Id.* (throughout).

⁷ *Id.*

⁸ OAG Comments at p. 27. March 5, 2019.

term utilization of the MEC resources beyond their current PPAs in order to demonstrate much of the forecasted cost savings.⁹ The long-term nature of the analysis creates additional risk that the benefits will fail to materialize.

On the other hand, acquisition of MEC by an unregulated Xcel subsidiary does not require ratepayer investment and keeps the operational risk with an unregulated IPP. So long as the Xcel affiliate honors the existing PPA terms and conditions, customers are in approximately the same position as they would have been had Southern Company continued to service the PPAs, consistent with the Commission's prior decisions. It is critical that the Commission and parties examine the relevant information required by Minnesota law and Commission rules pertaining to utility affiliate transactions to ensure there are no changes to the PPA and that there are no terms that need to be modified due to the change in ownership. However, to the extent the terms of the PPAs are merely a continuation of those already approved, the Commission may wish to rely on previous findings in expeditiously approving the MEC PPAs with an Xcel affiliate.

Going forward, it will also be critical for the Commission to continue to protect ratepayers from subsidizing Xcel's affiliated businesses through its regular rate regulation duties. This means that the Commission, CUB and other parties will need to be diligent in future general rate case ("GRC") proceedings to ensure that the cost of any joint or shared assets, services or personnel are appropriately allocated between the affiliated companies. The Commission should also exercise its authority under Minnesota Statute 216B.48, Subd. 6, to exercise continuing supervisory control over the terms of the affiliate MEC PPAs to ensure that the payments thereunder remain reasonable during its entire term.

⁹ *Id.* (citing to OAG Information Request 20, Exhibit 19, and Trade Secret Attachment A thereto which shows "the savings produced both before and after the expiration of the existing PPA's.").

Further, to the extent that Xcel wishes to re-negotiate any future PPAs or other transactions at MEC beyond the current PPAs, the Commission will need to closely monitor such transactions and approve them only if it finds that they are in the public interest.¹⁰ Minnesota law requires that the Commission oversee such affiliate transactions to ensure that they are competitive, fair and free from any untoward self-dealing. Xcel will bear the burden of proof to establish the reasonableness of any future affiliated contract or arrangement.¹¹

In short, CUB requests that the Commission take the following actions in this docket:

- Deny Xcel’s request to purchase MEC as a regulated rate-based asset;
- Allow Xcel to seek approval of the MEC purchase as a regulated rate-based asset in the IRP proceeding where the costs and benefits of ownership can be compared to all viable alternatives; or,
- Alternatively, allow Xcel to submit a Petition for Approval of an Affiliated Transaction pursuant to Minnesota Statute Section 216B.48 and Commission Rule 7825.2200. The Commission could consider expedited treatment if there are no changes to the MEC PPAs;
- If Xcel meets its burden and the Commission approves a Petition for Approval of Affiliate Transactions for the MEC PPAs, the Commission should ensure that it continues to:
 - Monitor the PPAs under its statutory authority to do so;
 - Ensure there is no customer subsidization of the unregulated companies in future general rate cases (“GRCs”); and
 - Ensure that any future contracts with the unregulated affiliates are closely scrutinized to ensure competitive neutrality.

II. The Affiliate Transaction Statutes and Commission Rules Apply to Any Contract Between Xcel and One of Its Affiliates.

¹⁰ Minn. Stat. Ann. § 216B.48, Subd. 3.

¹¹ *Id.*

Minnesota Statute at section 216B.48, Subd. 3. requires Commission approval of any contract, including a PPA, entered into after January 1, 1975 between a public utility and any affiliated interest before it is valid or effective. While Xcel's affiliate likely does not need Commission approval for its purchase of the MEC facility (because the affiliate is not a public utility), the law clearly requires Xcel and other utilities to obtain Commission approval to contract with affiliated companies to ensure that the public is protected from any inappropriate self-dealing.¹² One of the Commission's objectives is to protect ratepayers from subsidizing utility companies' affiliated businesses.¹³

Consequently, the Commission's Rules require utilities to file petitions for approval of affiliated contracts along with the following documentation:

- a descriptive title of each contract or agreement;
- a copy of the contract or agreement, or modifications or revisions of an existing contract or agreement;
- a list and the past history of all contracts or agreements outstanding between the petitioner and affiliated interest, the consideration received by the affiliated interest for such contracts or agreements, and a verified summary of the relevant cost records pertaining to the same;
- a descriptive summary of the pertinent facts and reasons why such contract or agreement is in the public interest;
- competitive bidding;
- if invitations for sealed written public proposals for the furnishing of the service sought under the contract or agreement have been made, a summary of the terms of the proposals received, including the name of each bidder or representative of a bidding group; and as an exhibit to the petition, a copy of each proposal received; and
- if invitations for sealed written proposals have not been made, an explanation of the decisions to that effect will be submitted.¹⁴

¹² *Id.*

¹³ *Minnegasco v. Minnesota PUC*, 549 N.W.2d 904 (Minn. 1996).

¹⁴ Minn. R. 7825.2200.

It will be valuable to parties and the Commission to review the above-required documentation to ensure that the MEC PPA terms are substantially the same as the terms the Commission previously approved when Xcel entered into current PPAs and to otherwise ensure there are no concerns raised by an Xcel affiliate acquiring MEC and the associated PPAs.

The requirements for “past history of all contracts or agreements,” “the consideration received by the affiliated interest for such contracts or agreements, and a verified summary of the relevant cost records pertaining to the same,” may or may not have relevance to the contract at issue given that the price of the MEC PPAs were negotiated some years ago and were subject to competitive bidding at the time they were approved. Also, given that the Xcel affiliate has not previously owned MEC, some of this data is likely unavailable. The Rule’s requirements regarding competitive bidding are also potentially inapplicable given that the MEC PPAs were subject to competitive bidding and, absent Sothern Company’s desire to sell, would otherwise continue to be in effect until they expire in 2026 and 2039.¹⁵

Assuming that Xcel proposes to simply step into Southern Company’s shoes and honor the existing PPAs, it is possible that its petition for approval of the MEC PPAs with its affiliate would be non-controversial and may be appropriate for an expedited approval. Because the MEC PPAs were initially negotiated between Xcel and unaffiliated IPPs and were previously approved by the Commission, there is little risk that assumption of those PPAs by an Xcel affiliate without modification would have a significant impact on customers. Nevertheless, Xcel must comply with the Commission’s Rules and

¹⁵ Office of Attorney General Information Request No. 20.

Minnesota's laws requiring approval of affiliate transactions and the Commission should be diligent in ensuring that Xcel is not proposing any significant changes to the MEC PPAs and that there are no terms that unfairly favor its affiliate to the detriment of ratepayers.

III. If an Xcel Affiliate Owns MEC, the PUC Should Continue to Carefully Scrutinize Xcel's Relationship With that Entity.

If the Commission approves the affiliate transactions for the MEC PPAs, it should carefully monitor the relationship between Xcel and its affiliate and its impacts on customers moving forward.

First, the Commission should exercise its authority to supervise and, if necessary, modify any future contract between Xcel and an affiliate that purchases MEC. Pursuant to Minn. Stat. Ann. § 216B.48, Subd. 6, the Commission “shall have continuing supervisory control over the terms and conditions,” of any affiliate contract as needed to protect the public interest. This means that the Commission can order adjustments to the MEC PPAs if it finds in the future that such modifications are necessary.

Second, the Commission should ensure that ratepayers are not subsidizing Xcel's affiliated businesses via rate setting in future GRCs.¹⁶ To ensure there is no improper subsidization, the Commission should carefully scrutinize any joint or shared assets, service or personnel between Xcel and its affiliates to ensure the costs are properly separated, directly assigned or allocated.¹⁷ Further, Minn. Stat. Ann. § 216B.48, Subd. 5 empowers the Commission to “exclude from the accounts of the public utility any payment

¹⁶ *Minnegasco*, 549 N.W.2d at 908.

¹⁷ *See*, Commission Order E-015/AI-15-712. September 30, 2015 (finding that there was fair separation, direct assignment, and allocation of any joint or shared assets, services or personnel between affiliates in approving the Petition at issue).

or compensation to an affiliated interest ... under existing contracts or arrangements with the affiliated interest unless the public utility shall establish the reasonableness of the payment or compensation.” In examining a petition for approval of the affiliate PPAs, the Commission can take some comfort in the fact that it can continue to monitor the affiliate transactions and adjust rate recovery as needed in a GRC and to exclude any payments from Xcel to the affiliate that the Commission finds to be unreasonable.

Third, though the MEC PPAs will not expire until 2026 and 2039 respectively, CUB encourages the Commission to be explicit now about the standards under which it will review any proposed extensions of the PPAs in the future. Inherent in the Commission’s duty to set just and reasonable utility rates is its duty “to protect ratepayers from subsidizing utility company’s affiliated businesses.”¹⁸ To avoid subsidization concerns in the future when the current PPAs expire, the Commission should ensure that Xcel holds a competitive bidding process to replace the energy and capacity that MEC currently provides.

As mentioned earlier, Minn. R. 7825.2200 requires, among other things, that a utility seeking approval of an affiliated interest contract provide information about competitive bidding. CUB encourages the Commission to not only require Xcel to conduct a competitive bidding process to replace MEC’s energy and capacity but to exercise detailed oversight over the process. Given the substantial size of Xcel’s proposed affiliate investment in MEC, it is crucial that the Commission ensure that future competitive bidding processes are fair to all bidders and do not favor Xcel’s affiliate. The Commission

¹⁸ *Minnegasco*, 549 N.W.2d at 908.

may want to consider enlisting an independent evaluator to oversee the process and to ensure that all bids are evaluated on an equal footing, as is common in other jurisdictions.

IV. Conclusion and Recommendations

For all of the reasons stated herein, CUB requests that the Commission take the following actions in this docket:

- Deny Xcel’s request to purchase MEC as a regulated rate-based asset;
- Allow Xcel to seek approval of the MEC purchase as a regulated rate-based asset in the IRP proceeding where the costs and benefits of ownership can be compared to all viable alternatives; or,
- Alternatively, allow Xcel to submit a Petition for Approval of an Affiliated Transaction pursuant to Minnesota Statute Section 216B.48 and Commission Rule 7825.2200. The Commission could consider expedited treatment if there are no changes to the MEC PPAs;
- If Xcel meets its burden and the Commission approves a Petition for Approval of Affiliate Transactions for the MEC PPAs, the Commission should ensure that it continues to:
 - Monitor the PPAs under its statutory authority to do so;
 - Ensure there is no customer subsidization of the unregulated companies in future general rate cases (“GRCs”); and
 - Ensure that any future contracts with the unregulated affiliates are closely scrutinized to ensure competitive neutrality.

// // //

Dated: August 30, 2019

Respectfully Submitted,

BY: s/ Jacob J. Schlesinger

Jacob J. Schlesinger

Scott F. Dunbar

KEYES & FOX, LLP

1580 Lincoln St., Suite 880

Denver, CO 80203

Telephone: (720) 639-2190

jschlesinger@keyesfox.com

sdunbar@keyesfox.com

ATTORNEYS FOR CUB

CERTIFICATE OF SERVICE

I, Vanessa Luthringer, 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

The Citizens Utility Board of Minnesota's Legal Comments Regarding Affiliate Transactions

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

Dated this 30th day of August 2019

/s/Vanessa Luthringer

Vanessa Luthringer

KEYES AND FOX LLP

1155 Kildaire Farm Rd., Suite 202-203

Cary, NC 27511

Tele: (919) 238-4785

Email: vluthringer@keyesfox.com

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@xcelenery.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@mtn.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
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
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
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
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
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@piic.org	Prairie Island Indian Community	5636 Sturgeon Lake Rd Welch, MN 55089	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