

April 1, 2020

**PUBLIC DOCUMENT**

Will Seuffert  
Executive Secretary  
Minnesota Public Utilities Commission  
121 7<sup>th</sup> Place East, Suite 350  
Saint Paul, Minnesota 55101-2147

RE: **PUBLIC Comments of the Minnesota Department of Commerce, Division of Energy Resources**  
Docket No. E002/M-19-809

Dear Mr. Seuffert:

Attached are the **PUBLIC** Comments of the Minnesota Department of Commerce, Division of Energy Resources (Department), in the following matter:

Petition for Approval of a Plan to Offer Generating Resources into the MISO Market on a Seasonal Basis.

The Petition was filed on December 20, 2019 by:

Al Krug  
Associate Vice President, State Regulatory Policy  
Northern States Power, d/b/a Xcel Energy  
414 Nicollet Mall, 401 - 7th Floor  
Minneapolis, MN 55401

The Department appreciates that Xcel Energy has been exploring ways to minimize fuel costs and reduce use of its most carbon-intensive resources. Given that Xcel already has adequate leeway as to its strategies for bidding resources into the wholesale energy market of the Midcontinent Independent System Operator, the Department recommends that the Minnesota Public Utilities Commission (Commission) **take no action on the proposed Unit Commitment Plan.**

Further, since the true-up of Xcel's fuel clause adjustment will be addressed in another proceeding, the Department recommends that the Commission either **deny or take no action on Xcel's proposed true-up proposal.** The Department is available to answer any questions that the Commission may have in this matter.

Sincerely,

/s/ STEVE RAKOW  
Analyst Coordinator

/s/ MARK JOHNSON  
Analyst Coordinator

SR/MJ/ja  
Attachment



## Before the Minnesota Public Utilities Commission

### PUBLIC Comments of the Minnesota Department of Commerce Division of Energy Resources

Docket No. E002/M-19-809

#### I. INTRODUCTION AND SUMMARY OF PROPOSAL

On December 20, 2019 Northern States Power Company, doing business as Xcel Energy (Xcel or the Company) filed the Company's *Petition for Approval of a Plan to Offer Generating Resources into the MISO Market on a Seasonal Basis* (Petition). The Petition requests certain approvals from the Minnesota Public Utilities Commission (Commission) related to Xcel's plan to offer the Allen S. King Generating Station (King) and Sherburne County Generating Station Unit 2 (Sherco 2) into the Midcontinent Independent System Operator, Inc. (MISO) energy markets on a seasonal basis.

Specifically, Xcel requests that the Commission approve Xcel:

- offering King on a seasonal basis beginning as soon as March 1, 2020;
- offering Sherco 2 on a seasonal basis beginning September 1, 2020; and
- trueing-up 2020 fuel costs that may differ from Xcel's initial 2020 fuel forecast in Docket No. E002/AA-19-293 to reflect the change in commitment of King and Sherco 2.

Xcel indicated that offering King and Sherco 2 on a seasonal basis (referred to as Xcel's "Unit Commitment Plan") would provide additional certainty for operations, opportunities for operations and maintenance cost and capital expenditure savings, and reduced carbon emissions.

On January 10, 2020 the Commission issued its *Notice of Comment Period* (Notice). The Notice provided due dates for comments and indicated that the following topics are open for comment:

- Is Xcel's plan to offer these generators on the MISO market economic and in the public interest?
- How does Xcel's plan relate to the self-commitment and self-scheduling of large baseload generation facilities investigation in Docket No. E-999/CI-19-704?
- Is Xcel's request for preapproval to true-up 2020 fuel costs that differ from its initial 2020 fuel forecast as approved in Docket No. E-002/AA-19-293 reasonable?
- Are there other issues or concerns related to this matter?

Below are the Department's comments regarding the topics identified by the Notice.

## II. DEPARTMENT ANALYSIS

Overall, the Department supports Xcel's efforts to reduce costs and carbon emissions. Yet, as evidenced by the fact that the Company has already changed the way it bids its coal-fired generation facilities into the energy market administered by the Midcontinent System Operator (MISO), overall the Department concludes that the Commission need take no action on Xcel's request to change its bid strategy again.

Specifically, Xcel changed its bidding strategy from use of a "must-run" bid to an economic bid. The Department explains below how this approach is expected to reduce Xcel's energy costs. Further, since this approach has already reduced the extent to which MISO calls on the less economic coal facilities to operate, this approach is expected to reduce carbon emissions as well.

Moreover, Xcel is already required to operate its system efficiently. Thus, there is no need for the Commission to advise the Company on how to operate its system. Further, doing so may cause undue confusion and complexities under differing jurisdictions.

MISO is subject to the jurisdiction of the Federal Energy Regulatory Commission (FERC) and must abide by FERC's various regulations. Xcel, as a participant in the MISO energy market, must abide by MISO's rules that are subject to FERC's jurisdiction. Given that the Company is fully aware of its federal, state and local regulatory requirements and is capable of and compensated for meeting them, the Department recommends that the Commission avoid adding further complexity in directing Xcel's operations.

### A. GOVERNING STATUTES AND RULES

Minnesota Rules 7825.2390 states that "When a utility proposes new or revised electric energy or purchased gas adjustment provisions, the proposal is considered a change in rates and must be reviewed according to Commission rules and practices relating to utility rate changes." Since Xcel is proposing to change the Company's fuel cost true-up (i.e., receive pre-approval to true up any deviation between fuel costs incurred and fuel costs recovered), under Minnesota Rules 7825.2390 the Petition constitutes a proposal to revise electric energy adjustment provisions and must therefore be decided by the Commission.

The statutory authority for Minnesota Rules 7825.2390 includes Minnesota Statutes §§ 216B.03 and 216B.16. Regarding the Commission's determination:

- Minnesota Statutes §216B.03 states:
  - "To the maximum reasonable extent, the Commission shall set rates to encourage energy conservation and renewable energy use" and
  - "Any doubt as to reasonableness should be resolved in favor of the consumer"
- Minnesota Statutes §216B.16 states:

- “The burden of proof to show that the rate change is just and reasonable shall be upon the public utility seeking the change” and
- “The Commission, in the exercise of its powers under this chapter to determine just and reasonable rates for public utilities, shall give due consideration to the public need for adequate, efficient, and reasonable service and to the need of the public utility for revenue sufficient to enable it to meet the cost of furnishing the service”

Under Minnesota Rules, the Petition falls within the definition of a “miscellaneous” filing under Minnesota Rules 7829.0100, subp. 11 since no determination of Xcel’s revenue requirement is necessary. Minnesota Rules part 7829.1300 contains the completeness requirements for miscellaneous filings. The Department reviewed the Petition for compliance with the completeness requirements of Minnesota Rules and concludes that the Petition is substantially complete.<sup>1</sup>

#### *B. IS XCEL’S PLAN IN THE PUBLIC INTEREST*

The Notice indicates that the first topic open for comment is “Is Xcel’s plan to offer these generators on the MISO market economic and in the public interest?”

The Petition discusses three commitment strategies available for Xcel’s King and Sherco 2 units:

1. continue with the standard practice, use a must-run<sup>2</sup> commitment strategy;
2. switch to use of an economic commitment strategy; and
3. switch to use of a seasonal<sup>3</sup> commitment strategy.

Xcel’s proposal is to switch to a seasonal strategy. At a high level, the Department observes the following:

- Using an economic commitment strategy (2 above) is expected to be more cost-effective than a must-run strategy (1), and
- Xcel’s proposed seasonal strategy (3) cannot represent the most economic path.

Using an economic commitment strategy means that, if the generation facility is more expensive than the highest-cost resource needed to meet demand, MISO will not select the facility to operate.

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<sup>1</sup> The only item missing was the electronic address of the utility employee responsible for the filing.

<sup>2</sup> Under a commit status of “must run” in the MISO energy market, each unit runs at its minimum operating limit or higher. In addition, “must run” disqualifies a unit from receiving make-whole payments if market prices are not sufficient to cover the unit’s variable production costs. The unit remains available for economic dispatch between the minimum and maximum output levels.

<sup>3</sup> The Company defines seasonal commitment as idling the plants during “shoulder” months of March to May and September to November. In the remaining months the unit is offered on an economic basis.

However, if the facility is less expensive than the highest-cost resource needed to meet demand, MISO will order the facility to operate. A must-run strategy, by contrast, means that the utility tells MISO that the plant must operate whether or not it is cost-effective.

Thus, using an economic commitment strategy clearly results in lower energy costs than a must-run strategy. The utility serves its customers using the lowest cost resources, whether those resources belong to the utility or to another entity bidding into the MISO market.

The seasonal strategy, by contrast, does not represent the most economic path, because a seasonal strategy merely turns the must-run strategy on its head. Under a seasonal strategy, units are forced out of the market rather than being forced into the market as under the must-run strategy. However, the differences between these approaches depends on the economics of the resources.

These expectations are demonstrated by Tables 2 and 3 of the Petition. Assuming that Xcel's estimates are correct, Table 2 shows that the economic commitment strategy should result in substantially lower fuel costs than the must-run strategy, with potential savings ranging from \$9.23 million to \$28.8 million under Xcel's assumed base MISO energy rate (locational marginal price, or LMP) and, even under assumed high MISO energy rates, savings of the economic strategy range from \$4.7 million to \$15 million.

Xcel estimates that the seasonal dispatch strategy would similarly decrease costs compared to the must-run strategy. As shown in Table A below, Xcel's estimated figures in Table 3 compared to Table 2, indicates that the seasonal strategy would also result in substantially lower costs than the must-run strategy, ranging from \$8.6 million to \$28.6 million under Xcel's assumed base MISO LMP and savings of \$3.6 million to \$14.3 million under the high LMP:<sup>4</sup>

**Table A: Potential Fuel-Clause Impacts of Seasonal Economic Commitment Plan vs Must-Commit for King and Sherco 2 (\$000)**

Base LMP			
(\$8,630)	(\$18,935)	(\$28,642)	(\$22,911)
High LMP			
(\$3,609)	(\$8,623)	(\$14,288)	(\$9,599)

Finally, as suggested by the information above, Table 3 in the Petition indicates that, while Xcel's estimated savings under the economic and seasonal strategies are close in cost, the seasonal strategy usually results in slightly higher costs than the economic strategy. Specifically, under the base MISO LMP, the seasonal dispatch strategy could cost between \$0.1 million to \$0.6 million more in years 2020 through 2022, but save \$0.2 million in 2023. Under a high MISO LMP, the seasonal dispatch strategy is

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<sup>4</sup> The figures in Table A sum the figures in Tables 2 and 3 of the Petition.

estimated to cost between \$0.4 million and \$1.1 million more than the economic commitment strategy.

Regarding Table 3, the remaining questions are:

1. Is the cost difference between the economic and seasonal strategies meaningful?
2. If so, what is being purchased by the higher costs of the seasonal strategy?

Regarding the first question, the Department lacks experience running the PLEXOS resource dispatch model and therefore cannot state with any degree of certainty how sensitive PLEXOS's outputs are to changes in inputs.<sup>5</sup> However, Xcel's Table 3 shows that:

- in 2020 the change in LMPs from base to high **[TRADE SECRET DATA HAS BEEN EXCISED]** results in a change of \$470,000 (in terms of the gap between the seasonal and economic strategies); and
- in 2021 the change in LMPs from base to high **[TRADE SECRET DATA HAS BEEN EXCISED]** results in a change of \$307,000.

For comparison purposes, in the last 5 years the highest annual average real time LMP at the Minnesota hub was \$26.57 in 2018 while the lowest annual average real time LMP at the Minnesota hub was \$20.54 in 2016. Using this data as a measure of uncertainty in the LMP input, a \$6 change in annual average LMPs could easily be realized. From this information it appears that the margin of error associated with LMP uncertainty alone potentially equals the value of the gap between the seasonal and economic strategies in several years. Considering that there are other uncertainties, such as actual hourly load, forced outages, the impact of generation additions and retirements on LMPs, and so on, it appears that the differences shown in Xcel's Table 3 are likely not significant. That is, the cost differences shown in the PLEXOS runs between the seasonal and economic strategies (Table 3) are within the likely margin of error and can be seen as essentially zero.<sup>6</sup>

An analysis similar to that applied to the fuel clause impacts can be applied to CO<sub>2</sub> emissions. Table 7 shows that a substantial reduction in CO<sub>2</sub> emissions—between 3 and 6 million tons annually—is expected from a switch from must-run commitment to economic commitment. This range applies regardless of the level of LMPs assumed in the model. However, Table 8 shows that the reduction in CO<sub>2</sub> emissions from a switch from economic commitment to seasonal commitment would be between 0.1 and 1 million tons annually. At the base level of LMPs the difference does not get above a

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<sup>5</sup> The Department did review certain PLEXOS inputs and outputs. However, from this review nothing stood out as unusual.

<sup>6</sup> For another example of the Department discussing the need to recognize a margin of error in modeling outputs see the Department's July 26, 2019 supplemental comments in Docket No. IP6949, E002/PA-18-702 at page 38 and Attachment 2.

reduction of 0.2 million tons; the reduction is between 0.5 and 1 million tons at the high LMP level. As with costs, the CO<sub>2</sub> emissions differences shown in the PLEXOS runs between the seasonal and economic strategies (Table 8) are within the likely margin of error and can be seen as essentially zero.

In summary both the seasonal and economic strategies are economically superior to the must-run strategy. This result indicates that the King and Sherco 2 facilities are expected to lack sufficient economics to be dispatched on a regular basis in the MISO energy market. However, the expected cost difference between the seasonal and economic strategies appears to be too small to measure with any degree of confidence. Therefore, the Department concludes that Xcel's plan to offer the King and Sherco units into the MISO market using a seasonal commitment strategy is reasonable, as would be continued use of economic commitment. However, the available data indicates that it is clear that the must-run commitment strategy is not reasonable.

#### *C. RELATION TO DOCKET NO. E999/CI-19-704*

The Notice indicates that the second topic open for comment is "How does Xcel's plan relate to the self-commitment and self-scheduling of large baseload generation facilities investigation in Docket No. E-999/CI-19-704?"

The Department concludes that Xcel's proposal in this proceeding, Docket No. E002/M-19-809, was prompted by the Commission's interest in the topic, as articulated in the Commission's November 13, 2019 *Order Accepting 2017-2018 Reports and Setting Additional Requirements* in Docket No. E999/AA-18-373, which resulted in the initiation of the Commission investigation proceeding, Docket No. E999/CI-19-704. Substantial data on baseload unit participation in MISO markets is available in Docket No. E999/CI-19-704; such data may have spurred Xcel to examine its practices regarding baseload offerings in the MISO market.

The Department expects that utilities manage their systems, including commitment strategy, in a reasonable manner. Xcel is expected to minimize costs to the extent possible while maintaining system reliability. Xcel's switch from must-run commitment to economic and/or seasonal commitment appears to be the result of Xcel's efforts to do what is expected and does not require Commission approval. Therefore, the Commission need not take any action on the proposed Unit Commitment Plan. As further discussed below, any cost implications of the Unit Commitment Plan can and should be addressed in the Commission's investigation proceeding where the cost data, and associated support, is available for detailed review.

#### *D. FUEL COST TRUE-UP*

The Notice indicates the third topic open for comment to be "Is Xcel's request for preapproval to true-up 2020 fuel costs that differ from its initial 2020 fuel forecast as approved in Docket No. E-002/AA-19-293 reasonable?"

The Department opposes Xcel's request for pre-approval to true-up its 2020 fuel costs that differ from those approved in Xcel's forecasted fuel-clause docket in Docket No. E-002/AA-19-293 (19-293). As the Department explained at the Commission's February 27, 2020 Agenda meeting, the Commission, as well as the Department and other parties, spent significant time and resources in developing fuel-clause reform and forecasted fuel cost rates with true-up provisions in the fuel-clause reform dockets including 19-293.<sup>7</sup> As a result, the Department concludes that it is premature to override these processes in this proceeding by granting Xcel pre-approval to true-up its forecasted 2020 fuel costs.

Instead, the Department recommends that any future true-ups of Xcel's 2020 fuel costs follow the processes laid out in the fuel-clause reform dockets. Further, while, as noted above, Minnesota Rules 7825.2390 requires Commission approval of a proposal to revise electric energy adjustment provisions, and the Petition includes a proposal to do so, no specific rate changes are proposed. The Commission can continue to rely on the standard tools of rate regulation and consider the reasonableness of costs in the proceeding in which the cost data, and associated support, is available to do so.

Thus, the Department recommends that the Commission either deny or take no action on Xcel's request in this proceeding for pre-approval to true-up its 2020 fuel costs that differ from those approved in Xcel's forecasted fuel-clause proceeding in Docket No. E-002/AA-19-293 (19-293).

#### *E. OTHER ISSUES*

The Notice indicates that the third topic open for comment is "Are there other issues or concerns related to this matter?" The Department is not aware of any other issues or concerns at this time.

### **III. CONCLUSION AND RECOMMENDATIONS**

The Department concludes that, based on the available data, the must-run commitment strategy for Sherco 2 and King is not reasonable. However, the Commission need not take any action regarding Xcel's dispatch decisions in this proceeding.

The Department also recommends that the Commission either deny or take no action on Xcel's request in this proceeding for preapproval to true-up its 2020 fuel costs that differ from those approved in Xcel's forecasted fuel-clause proceeding in Docket No. E-002/AA-19-293.

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<sup>7</sup> Dockets Nos. E999/AI-03-802, E002/AA-19-293 (Xcel), E017/AA-19-297 (Otter Tail Power Company), and E015/AA-19-302 (Minnesota Power).

## **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  
Public Comments**

**Docket No. E002/M-19-809**

Dated this **1<sup>st</sup>** day of **April 2020**

**/s/Sharon Ferguson**

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_19-809_Official List
Christopher	Anderson	canderson@allete.com	Minnesota Power	30 W Superior St  Duluth, MN 558022191	Electronic Service	No	OFF_SL_19-809_Official List
Alison C	Archer	aarcher@misoenergy.org	MISO	2985 Ames Crossing Rd  Eagan, MN 55121	Electronic Service	No	OFF_SL_19-809_Official List
Mara	Ascheman	mara.k.ascheman@xcelenenergy.com	Xcel Energy	414 Nicollet Mall Fl 5  Minneapolis, MN 55401	Electronic Service	No	OFF_SL_19-809_Official List
Gail	Baranko	gail.baranko@xcelenergy.com	Xcel Energy	414 Nicollet Mall 7th Floor  Minneapolis, MN 55401	Electronic Service	No	OFF_SL_19-809_Official List
James J.	Bertrand	james.bertrand@stinson.com	STINSON LLP	50 S 6th St Ste 2600  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-809_Official 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_19-809_Official List
John	Coffman	john@johncoffman.net	AARP	871 Tuxedo Blvd.  St. Louis, MO 63119-2044	Electronic Service	No	OFF_SL_19-809_Official List
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400  St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_19-809_Official List
Riley	Conlin	riley.conlin@stoel.com	Stoel Rives LLP	33 S. 6th Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-809_Official List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
George	Crocker	gwillc@nawo.org	North American Water Office	PO Box 174  Lake Elmo, MN 55042	Electronic Service	No	OFF_SL_19-809_Official 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_19-809_Official List
Rebecca	Eilers	rebecca.d.eilers@xcelenergy.com	Xcel Energy	414 Nicollet Mall - 401 7th Floor  Minneapolis, MN 55401	Electronic Service	No	OFF_SL_19-809_Official List
John	Farrell	jfarrell@ilsr.org	Institute for Local Self-Reliance	2720 E. 22nd St Institute for Local Self-Reliance Minneapolis, MN 55406	Electronic Service	No	OFF_SL_19-809_Official 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_19-809_Official List
Edward	Garvey	edward.garvey@AESLconsulting.com	AESL Consulting	32 Lawton St  Saint Paul, MN 55102-2617	Electronic Service	No	OFF_SL_19-809_Official List
Edward	Garvey	garveyed@aol.com	Residence	32 Lawton St  Saint Paul, MN 55102	Electronic Service	No	OFF_SL_19-809_Official List
Bruce	Gerhardson	bgerhardson@otpc.com	Otter Tail Power Company	PO Box 496 215 S Cascade St Fergus Falls, MN 565380496	Electronic Service	No	OFF_SL_19-809_Official List
Allen	Gleckner	gleckner@fresh-energy.org	Fresh Energy	408 St. Peter Street Ste 220 Saint Paul, Minnesota 55102	Electronic Service	No	OFF_SL_19-809_Official List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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_19-809_Official 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_19-809_Official List
Alan	Jenkins	aj@jenkinsatlaw.com	Jenkins at Law	2950 Yellowtail Ave.  Marathon, FL 33050	Electronic Service	No	OFF_SL_19-809_Official List
Linda	Jensen	linda.s.jensen@ag.state.mn.us	Office of the Attorney General-DOC	1800 BRM Tower 445 Minnesota Street  St. Paul, MN 551012134	Electronic Service	No	OFF_SL_19-809_Official List
Richard	Johnson	Rick.Johnson@lawmoss.com	Moss & Barnett	150 S. 5th Street Suite 1200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-809_Official 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_19-809_Official List
Mark J.	Kaufman	mkaufman@ibewlocal949.org	IBEW Local Union 949	12908 Nicollet Avenue South  Burnsville, MN 55337	Electronic Service	No	OFF_SL_19-809_Official List
Thomas	Koehler	TGK@IBEW160.org	Local Union #160, IBEW	2909 Anthony Ln  St Anthony Village, MN 55418-3238	Electronic Service	No	OFF_SL_19-809_Official List
Michael	Krikava	mkrikava@taftlaw.com	TAFT Stettinius & Hollister, LLP	2200 IDS Center 80 S 8th St Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-809_Official List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Peder	Larson	plarson@larkinhoffman.com	Larkin Hoffman Daly & Lindgren, Ltd.	8300 Norman Center Drive Suite 1000 Bloomington, MN 55437	Electronic Service	No	OFF_SL_19-809_Official List
Douglas	Larson	dlarson@dakotaelectric.com	Dakota Electric Association	4300 220th St W  Farmington, MN 55024	Electronic Service	No	OFF_SL_19-809_Official List
Ryan	Long	ryan.j.long@xcelenergy.com	Xcel Energy	414 Nicollet Mall 401 8th Floor Minneapolis, MN 55401	Electronic Service	No	OFF_SL_19-809_Official List
Kavita	Maini	kmairi@wi.rr.com	KM Energy Consulting, LLC	961 N Lost Woods Rd  Oconomowoc, WI 53066	Electronic Service	No	OFF_SL_19-809_Official List
Pam	Marshall	pam@energycents.org	Energy CENTS Coalition	823 7th St E  St. Paul, MN 55106	Electronic Service	No	OFF_SL_19-809_Official List
Mary	Martinka	mary.a.martinka@xcelenergy.com	Xcel Energy Inc	414 Nicollet Mall 7th Floor Minneapolis, MN 55401	Electronic Service	No	OFF_SL_19-809_Official List
Brian	Meloy	brian.meloy@stinson.com	STINSON LLP	50 S 6th St Ste 2600  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-809_Official 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_19-809_Official List
Stacy	Miller	stacy.miller@minneapolismn.gov	City of Minneapolis	350 S. 5th Street Room M 301 Minneapolis, MN 55415	Electronic Service	No	OFF_SL_19-809_Official List
David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St  Duluth, MN 558022093	Electronic Service	No	OFF_SL_19-809_Official List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP	33 South Sixth St Ste 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-809_Official 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_19-809_Official List
Leann	Oehlerking Boes	lboes@mnpower.com	Minnesota Power	30 W Superior St  Duluth, MN 55802	Electronic Service	No	OFF_SL_19-809_Official List
Randy	Olson	rolson@dakotaelectric.com	Dakota Electric Association	4300 220th Street W.  Farmington, MN 55024-9583	Electronic Service	No	OFF_SL_19-809_Official List
Carol A.	Overland	overland@legalectric.org	Legalelectric - Overland Law Office	1110 West Avenue  Red Wing, MN 55066	Electronic Service	No	OFF_SL_19-809_Official 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_19-809_Official 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_19-809_Official List
Isabel	Ricker	ricker@fresh-energy.org	Fresh Energy	408 Saint Peter Street Suite 220 Saint Paul, MN 55102	Electronic Service	No	OFF_SL_19-809_Official List
Amanda	Rome	amanda.rome@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 5  Minneapolis, MN 55401	Electronic Service	No	OFF_SL_19-809_Official List
Richard	Savelkoul	rsavelkoul@martinsquires.com	Martin & Squires, P.A.	332 Minnesota Street Ste W2750  St. Paul, MN 55101	Electronic Service	No	OFF_SL_19-809_Official List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th PI E Ste 350  Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_19-809_Official List
Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates	7400 Lyndale Ave S Ste 190  Richfield, MN 55423	Electronic Service	Yes	OFF_SL_19-809_Official 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_19-809_Official List
Byron E.	Starns	byron.starns@stinson.com	STINSON LLP	50 S 6th St Ste 2600  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-809_Official 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_19-809_Official List
Eric	Swanson	eswanson@winthrop.com	Winthrop & Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_19-809_Official List
Lynnette	Sweet	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7  Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_19-809_Official List
Stuart	Tommerdahl	stommerdahl@otpc.com	Otter Tail Power Company	215 S Cascade St PO Box 496 Fergus Falls, MN 56537	Electronic Service	No	OFF_SL_19-809_Official List
Brian	Tulloh	btulloh@misoenergy.org	MISO	2985 Ames Crossing Rd  Eagan, MN 55121-2498	Electronic Service	No	OFF_SL_19-809_Official List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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_19-809_Official List
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_19-809_Official List
Scott M.	Wilensky	scott.wilensky@xcelenergy.com	Xcel Energy	7th Floor 414 Nicollet Mall Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_19-809_Official List
Samantha	Williams	swilliams@nrdc.org	Natural Resources Defense Council	20 N. Wacker Drive Ste 1600 Chicago, IL 60606	Electronic Service	No	OFF_SL_19-809_Official List
Joseph	Windler	jwindler@winthrop.com	Winthrop & Weinstine	225 South Sixth Street, Suite 3500  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-809_Official 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_19-809_Official List