

**STATE OF MINNESOTA  
BEFORE THE PUBLIC UTILITIES COMMISSION**

Katie Sieben	Chair
Valerie Means	Commissioner
Matthew Schuerger	Commissioner
Joseph Sullivan	Commissioner
John Tuma	Commissioner

In the Matter of Xcel Energy's Integrated  
Distribution Plan and Advanced Grid  
Intelligence and Security Certification Request

Docket No. E002/M-19-666

**SUPPLEMENTAL COMMENTS OF THE CITIZENS UTILITY BOARD OF MINNESOTA**

**I. Introduction**

The Citizens Utility Board of Minnesota (CUB) respectfully submits these supplemental comments regarding Xcel Energy's (Xcel) Integrated Distribution Plan (IDP) and Advanced Grid Intelligence and Security (AGIS) Certification Request, in response to the Public Utilities Commission's (PUC or Commission) December 31, 2019 Notice of Comment in the above-referenced docket, as amended by the Commission's April 1, 2020 Notice of Extended Reply and Supplemental Comment Period.

CUB, with the assistance of its expert, Strategen Consulting, LLC<sup>1</sup> (Strategen), reviewed Xcel's IDP filing as well as the parties' initial and reply comments. With respect to CUB's initial comments, a memorandum, prepared by Strategen, was attached thereto and provided a review of the Xcel's proposed Advanced Metering Infrastructure (AMI) and the interrelated Field Area Network (FAN) investments. Additionally, Strategen analyzed Xcel's request for the Commission to certify these investments to enable future rate rider recovery and the relationship between Xcel's certification request and Minnesota's regulatory framework, including the utilization of a Multi-Year Rate Plan (MYRP).

CUB maintains that a modernized grid is the "backbone" necessary to advance Minnesota's energy goals, support integration of additional levels of renewables, empower consumers to make their own choices about the level and type of electric service they desire, and leverage customer-sited resources to assist in grid operation. Likewise, implementation of a grid modernization program should assist in both improving system reliability and flexibility. In that spirit, many of the investments proposed in Xcel's Integrated Distribution Plan, namely AMI and the interrelated FAN, can lay an important foundation for a dynamic, customer-centric utility approach in the future.

CUB reiterates that notwithstanding the potential benefits from AMI and grid modernization, experience has shown that these investments are inherently complex and can be subject to cost overruns. In addition, the customer-facing value proposition identified at the outset of a project is not

---

<sup>1</sup> Strategen Consulting, LLC, a California firm, is comprised of a team of well-respected leaders with technical, regulatory, product and organizational expertise in energy markets who have decades of experience working closely with consumer advocates, regulators, utilities, research institutions, technology providers, project developers, and large energy users to evaluate, analyze, and implement strong regulatory and policy strategies.

often realized upon implementation. These elements are further underscored by the Company's own determination that quantifiable benefits do not exceed quantifiable costs. Accordingly, the realization of qualitative, customer-facing benefits is critical to justifying an investment of this magnitude.

## **II. Certification Request**

As a threshold matter, there remains broad and significant concern among stakeholders regarding certification and use of riders, generally, to recover investments in projects like the AGIS proposal; projects involving significant investment and that span multiple years can easily have cost-containment and double-recovery issues (as costs easily overlap into other cost categories, including those recovered through existing rates).

The Minnesota Department of Commerce, Division of Energy Resources (Department) agrees with the arguments presented in CUB's initial comments that the certification process is discretionary, and that the determination on certification should be made with the totality of circumstances of the request, including factors such as timing of the next MYRP, size of investment, low cost to benefit ratio, unclear customer class impacts and others).<sup>2</sup> It is also worth highlighting that the City of Minneapolis and Clean Energy Economy Minnesota (CEEM) shared CUB's concerns that a certification analysis would be incomplete if it did not also account for the impact the certification, and subsequent rider recovery, would have upon the efficacy of the utility's MYRP, and that certification and rider recovery would likely undercut the Commission's ability to ensure that the Company's next MYRP would result in just and reasonable rates. Moreover, as CUB emphasized in its initial comments, the extensive use of riders shifts the amount of risk that is borne by the customer base as compared to that borne by the Company.

Consistent with CUB's initial comments, the City of Minneapolis, as a preferred approach, recommended denial of the certification and, instead, consideration of the proposal under a MYRP.<sup>3</sup> As CUB noted in its initial comments, while we recommend certification denial, the Commission could, alternatively, direct the Company to move forward with AGIS and require conditions to ensure ratepayer protections in any future cost recovery request.

### **A. A Contested Case Proceeding is Warranted and Necessary to Adequately Evaluate Xcel's AGIS Initiative and to Ensure Proper Consumer Protections are Established**

**CUB continues to maintain that certification and subsequent rider recovery of AGIS investments is not in the public interest and should be denied. That said, CUB supports the Department's proposal to refer the AGIS Initiative (and aspects of Xcel's planned distribution system capital investments) to a contested case hearing overseen by the Office of Administrative Hearings as the preferred path forward.<sup>4</sup>**

CUB shares the Department's belief that approval of a certification request, which is discretionary, should only be granted if it is determined that rider recovery of the investment is in the public interest. The Department's position is consistent with CUB's, that rider recovery for the AGIS Initiative would reduce transparent accounting of all distribution system costs and could lead to double recovery (once

---

<sup>2</sup> See Department Reply Comments at 14.

<sup>3</sup> See City of Minneapolis Initial Comments at 8.

<sup>4</sup> See Department Reply Comments at 14-15.

through the Transmission Cost Recovery (TCR) Rider, and again through base rates, or through overlapping cost categories.)<sup>5</sup> CUB agrees that these issues support the position that additional scrutiny is warranted prior to authorizing rider recovery (or any proceeding deemed appropriate for cost recovery purposes), to ensure Xcel, stakeholders, and the Commission have a common understanding of the costs, project scope, and system functions that are being proposed.

Generally, CUB agrees with the Department that the AGIS Initiative should not be certified at this time. CUB fully supports referral of the AGIS Initiative (and aspects of Xcel's planned distribution system capital investments) to a contested case hearing overseen by the Office of Administrative Hearings as an optimal path forward, in terms of providing a forum for a level of evaluation and analysis of Xcel's proposal akin to a rate case, helping to ensure important ratepayer and customer privacy protections, proceeding in an efficient and timely manner, and allowing for additional, important input from the public.<sup>6</sup> Critically, as outlined by the Department, the hearing process should facilitate alignment with the next MYRP or next TCR filing, and the outcome would be a determination of reasonable costs, identification of important ratepayer benefits and customer protections, and a clear vision for the future of Xcel's distribution system that is in the public interest.

Consistent with the Department's reply comments, and in recognition of the near-universal acknowledgment among stakeholders that certification of AGIS investments is very problematic, CUB concludes that, absent additional scrutiny, a decision on certification at this time would be inefficient, as the issues are likely to return to Commission and stakeholders regardless, either the next MYRP or 2021 Transmission Cost Recovery (TCR) Rider petition. Therefore, it is prudent to conduct a formal evaluation at this juncture and in a manner commensurate with the scope of the Company's request.

**Accordingly, CUB supports the Department's Recommendation 3, as revised in its reply comments.<sup>7</sup>**

CUB agrees that increased transparency and analysis is necessary for the AGIS Initiative and that additional evaluation should include review of the \$2.5 billion in investments in the ISI Initiative and increased distribution system spending. Approval of any investments of this scale should include appropriate ratepayer protections, clear plans for system benefits, and clear outcomes that would inform future Commission decisions. As noted by Xcel and emphasized by the Department, the six-month certification process would provide the utility with cost recovery assurance by authorizing rider treatment; however, the timeframe does not allow full consideration of ratepayer protections, and it is potentially the most limited process (comment and reply) utilized by the Commission. The AGIS proposal involves significant multi-year capital investments which are unsuited for rider recovery, especially here, where the proposal includes a system transformation (potentially without conditions), at a high cost, over many years (beyond that of even a single MYRP), and with significant ratepayer impacts, many of which are unknown at this time.

CUB shares the Department's view that an important benefit of this approach is that an OAH evaluation conducted now could be concluded before or during the next MYRP.<sup>8</sup>

---

<sup>5</sup> Department Reply Comments at 14-15.

<sup>6</sup> See Department Reply Comments at 15.

<sup>7</sup> See Department Reply Comments at 17-18.

<sup>8</sup> See Department Reply Comments at 22.

## **B. Xcel has Failed to Demonstrate Why Certification of the AGIS initiative is in the Public Interest**

Although Xcel rightly points out that rider recovery of certified advanced grid investments is permissible by statute, the Company fails to demonstrate why the use of rider recovery is appropriate for an investment of this magnitude and complexity and for a Company that is currently not operating under an MYRP. Xcel has failed to prove that rider recovery of the AGIS Initiative is in the public interest and has not outlined why the Commission should exercise its discretion to certify the AGIS investments.

As discussed in CUB's initial comments and pointed out by other parties, the Commission need not feel compelled to grant certification of the Company's identified investments. Per Minn. Stat. § 216B.2425, Subd. 2e, a utility operating under a Commission-approved MYRP "shall identify in its [distribution plan] investments that it considers necessary to modernize the transmission and distribution system...." Having been presented with a list of identified investments, the Commission shall "certify, certify as modified, or deny certification of the transmission and distribution investments identified under subdivision 2."<sup>9</sup>

Although certification does not guarantee cost recovery, it provides the Company with an opportunity to request recovery of costs in a subsequent rider filing. Indeed, as the Company has outlined, certification of AGIS projects "will provide a cost recovery option in the event the Company would not otherwise file a general rate case following the conclusion of [a] MYRP period."<sup>10</sup> In other words, the certification process serves primarily as a "stage gate" mechanism, serving as the first step toward rider recovery of the identified investments.

Thus, in order for Xcel to show that *certification* is in the public interest, it must demonstrate more than simply that the underlying investments are in the public interest or that the Commission has the authority to exercise its discretion to certify the investments in question. **The central question in a certification decision is necessarily whether the identified investments should be recovered via rider, as opposed to other means.**

Xcel goes to some lengths to discuss how: (1) certification is an available regulatory mechanism; (2) the Company has met the Commission's requirements for certification; (3) additional process should wait until a cost-recovery proceeding; and (4) rider recovery of Xcel's proposed AGIS is allowed by statute.<sup>11</sup> Even assuming, *arguendo*, that Xcel has demonstrated certification is an available regulatory mechanism,<sup>12</sup> that it has met a narrowly prescribed set of certification requirements, and that rider recovery of AGIS is *permissible* by statute, the Company has not made an adequate showing as to why rider recovery is necessary and in the public interest and therefore why certification is necessary and in the public interest.

It is insufficient to demonstrate merely that the Commission maintains the statutory authority to certify; Xcel must also fulfil its obligation to outline why an exercise of that authority benefits all

---

<sup>9</sup> Minn. Stat. § 216B.2425, Subd. 3. CUB further notes that the Commission likely lacks statutory authority to grant certification in the instant case because Xcel is not currently operating under an MYRP.

<sup>10</sup> Docket No. E002/GR-19-564, Gersack Direct, at 19.

<sup>11</sup> See Xcel Reply Comments, at 5.

<sup>12</sup> CUB notes, however, that we and other parties have argued that Xcel is not currently eligible for certification because it is not operating under an MYRP. See CUB's Initial Comments, Attachment A at 8.

customers and specifically why rider recovery is preferred to other available cost recovery mechanisms. The Company has simply not met this threshold burden.

To the extent that the Company suggests that customers will not be able to enjoy the purported benefits of the AGIS Initiative unless the Commission grants the use of its preferred cost recovery mechanism is disingenuous, at best, and, at worst, a dereliction of Xcel's obligations as a public service corporation. Indeed, CUB observes that Xcel's implementation plans appear "contingent on a certification decision in this proceeding to move forward."<sup>13</sup> A suggestion that Xcel would not move forward with the AGIS investments unless it is permitted to recover its costs through a rider, and presumably, that without rider recovery the Company will not pursue the AGIS Initiative outside of a test year is not consistent with the system that Minnesota uses to regulate utilities. As the Office of Attorney General (OAG) has stated in a similar context, "[t]he fact that Xcel is operating under a MYRP does not mean that all of the potential costs not included in the test years should be recovered through a rider."<sup>14</sup>

Xcel had originally proposed to recover AGIS investments in the Company's MYRP request, filed on November 1, 2019. The very nature of this initial cost recovery request would have necessitated an evaluation in a contested case setting, namely a rate case. For the Company to voluntarily withdraw its MYRP application and now claim that "[d]elaying certification pending a rulemaking or contested case would put unnecessary pressure and uncertainty on these investments,"<sup>15</sup> appears to an attempt to sidestep the type of comprehensive analysis and evaluation an investment of this magnitude and complexity needs and deserves. In fact, if certainty is truly what the Company seeks, holding further process at the certification stage pursuant to the Department's recommendation, as revised in its reply comments, would streamline and expedite the type of process that Xcel concedes is appropriate for the cost recovery phase of its request for TCR rider treatment of AGIS investments. Waiting until the cost recovery phase of the process to engage in a contested case proceeding would not confer any greater clarity or certainty and should not impact whether or not "portions of the projects would need to be abandoned altogether."<sup>16</sup> Xcel's approach and arguments in this regard appear to serve the interests of opacity and gamesmanship rather than the interests of transparency and integrity of the regulatory framework. Accordingly, CUB offers that such arguments are without merit.

### **III. Harmonization of MYRP with IDP and IRP**

The timing and calibration of a three- to five- year MYRP cycle should be harmonized with power system planning and procurement cycles. This is particularly true given Xcel's IDP, which provides a 5-year action plan as part of a long-term plan for the distribution system, as required by filing requirement 3.D.2. The IDP action plan will likely have a material impact on system operation costs due to the nature and scale of new technologies deployed, which are partially predicated on achievement of greater efficiency. Overreliance on interim cost recovery mechanisms, such as the TCR rider, to account for major investments included in a five-year IDP action plan could result in a cumbersome regulatory process and dilute the cost reduction incentives integral to an MYRP. This is

---

<sup>13</sup> Xcel Reply Comments, Attachment A at 25.

<sup>14</sup> *In re Xcel's Residential Time of Use Rate Design Pilot Program*, Docket No. E002/M-17-775, OAG's Initial Comments, filed February 5, 2018, at 27.

<sup>15</sup> Xcel's Reply Comments at 26.

<sup>16</sup> Xcel's Reply Comments at 26.

even more critical with the anticipated investments identified through the Company's Integrated Resource Plan (IRP) as well.<sup>17</sup>

CUB observes that other parties agree with and support the need to appropriately link these important regulatory activities. While not recommending specific action at this time, the Department observes that other states are looking at this alignment between the related case types, MYRP, IRPs, IDPs, and performance incentives, and notes that this issue "will continue to arise and would be assisted by properly setting the system frameworks and expectations (system plans, as discussed above), now, that would inform future MYRPs and could support alignment of performance incentive mechanisms."<sup>18</sup> The Department further notes that Commission proceedings are not undertaken in isolation, however, timing of the proceedings should occur in a way that does not preclude the Commission's ability to harmonize the results of each proceeding.

The Environmental Law & Policy Center and Vote Solar (ELPC-VS) also agree that the Commission, interested stakeholders and in particular Xcel's customers stand to benefit from an examination of the linkage between Xcel's planning processes (distribution, transmission, and resource); cost recovery mechanisms; and performance measurement and reporting processes.<sup>19</sup> CUB agrees with ELPC-VS's further statement that "aligning these cycles does not mean simultaneous filing, nor does it require filing each with the same frequency. Rather it would mean that the Company harmonizes its ratemaking and planning cases such that the Company's revenue requirement during the cost control period is derived from an approved, stakeholder-informed investment plan."<sup>20</sup>

#### **IV. Consumer Protection Measures**

##### **A. Cost Recovery Caps and Benefits Assurance**

As CUB outlined in our initial comments, if the Commission is inclined to grant certification, specific consumer protection measures must be included as conditions of any such action. Indeed, the customer safeguard outlined therein, including fixed and variable cost recovery caps and a methodology to ensure contemporaneous delivery of benefits to customers, would be equally relevant and prudent should the Commission direct the Company to recover AGIS Initiative costs through its MYRP.

Given the importance of these customer safeguards, CUB agrees with and supports the Department's contention that the conditions crafted by parties as "back-up" proposals in the instance that the Commission may certify the AGIS proposal "are insufficient for an investment of this magnitude and considering the facts of this case (unclear criteria, insufficient process, overlapping rate case information without rate case analysis, etc.)."<sup>21</sup> Indeed, the conditions proposed by CUB and other parties would benefit from additional consideration, which would also occur through the contested case hearing process should the Commission decide to pursue that option.

---

<sup>17</sup> See CUB's Initial Comments, Attachment A at 9.

<sup>18</sup> See Department's Reply Comments at 8.

<sup>19</sup> See ELPC-VS's Reply Comments at 2.

<sup>20</sup> ELPC-VS's Reply Comments at 2.

<sup>21</sup> Department's Reply Comments at 20-21.

## **B. Data Access Policies to Unlock Customer Value**

The deployment of AMI offers significant operational benefits for utilities and the potential for significant energy savings for consumers. A major lesson from prior state deployments of AMI is that full realization of consumer benefits from efficiency or time-shifting of usage will not occur unless consumers have convenient access to their own energy data made available by advanced meters. It is also critical that such policies are timely and consistently implemented. CUB offers that, should the Commission be inclined to grant certification of the Company's AGIS Initiative, such approval be conditioned on ensuring that consumers receive their share of the benefits of AMI – specifically, access to the energy data generated by their advanced meters, along with accompanying cost information.

More specifically, as articulated in CUB's initial comments, to ensure that Xcel's electricity customers have functional, secure access to new data-enabled technologies and services to help them save energy and money, and otherwise realize value from the state's advanced metering infrastructure deployment, CUB recommends the following:

- Provide consumers easy access to the best available information about their energy usage through two interfaces, including both the Company's FAN and a customer's home area network;
- Provide customers and authorized third parties with access to historic billing information in a machine-readable, automated manner;
- Provide consumers and third parties with rate information in standardized, machine readable formats;
- Provide a customer authorization process that is easy for consumers to use and requires the least number of steps; and
- Provide a set of open data access standards that would create the ability for third parties to access sets of customer energy use data, either aggregated or anonymized.<sup>22</sup>

CUB notes that Fresh Energy, the City of Minneapolis, and the Institute for Local-Self Reliance all expressed strong support in backing minimum standards for customer and third party data access.

CUB also acknowledges and appreciates the Company's commitment to making Green Button Connect My Data (GBC) and the Home Area Network (HAN) accessible to customers within one year after mass deployment of AMI meters begins.<sup>23</sup> CUB also appreciates Xcel's confirmation that the Company's HAN offering contemplates customers' ability to "bring their own device" to take advantage of HAN capabilities. CUB further notes the Company's description of an ongoing "project to make rate information available in a machine-readable electronic format" to be completed in parallel with Xcel's GBC and HAN projects. The Commission should hold Xcel to these commitments by establishing a date-certain deadline of June 2022 as a condition of an IDP acceptance or approval

Finally, CUB reiterates our position that standards should be developed which recognize the need for ensuring customer privacy, while also allowing for the sharing of granular data sets for research in service to public policy goals.<sup>24</sup> The goal of adopting Open Data Access Standards is to provide energy use data in ways that are useful for third parties, while not unduly burdening utilities and associations, and protecting the privacy of individual customers.

---

<sup>22</sup> CUB's Initial Comments, Attachment A at 13-14.

<sup>23</sup> Xcel's Reply Comments, Attachment A at 25-26.

<sup>24</sup> See Docket No. E, G-999/M-19-505.

## V. Advanced Rate Design

CUB continues to highlight the critical interplay between Xcel's distribution grid modernization efforts and goals, on the one hand, and advanced rate design, on the other. Indeed, as we explained in our initial comments, Xcel's grid modernization efforts can serve as a pathway to enable additional value from DER and create opportunities for customers to more fully participate in the energy system. These opportunities cannot be fully realized without dynamic rate options and programs that help align customer behavior with grid needs.<sup>25</sup>

CUB notes that Fresh Energy and ELPC-VS both strongly support an Advanced Rate Design Roadmap that explains how Xcel will leverage the technological and data capabilities of advanced meters – a foundational component of Xcel's grid modernization effort – through rate design to benefit customers and support the Company's distribution system planning and operations. Indeed, as ELPC-VS point out, "the business case for the Advanced Metering Infrastructure and the Field Area Network components of the Company's request for certification in this proceeding are at least in part dependent on the Company's ability to leverage the value of those technologies through rate design."<sup>26</sup>

More specifically, Fresh Energy, in its comments, argues that Xcel should be required to develop a Rate Design Roadmap to accompany the next IDP that describes how the Company will leverage advanced metering infrastructure (AMI) capabilities to support the Commission's and Xcel's stated priorities. Fresh Energy offers that the roadmap should including the following components:

- A summary of the Company's current advanced rate designs and demand management programs, advanced rate designs in development, and relevant industry best practices.
- A timeline for offering updated dynamic rates and/or demand management programs for all customer classes.
- Potential rate and program design strategies to support low-income customer participation in these offerings.
- A discussion of opportunities for utilizing distributed energy resources and/or beneficial electrification technologies in conjunction with planned dynamic rates and/or demand management programs.
- Enrollment mechanisms for convenient customer participation in the advanced rate offerings.
- Implementation plans for offering advanced rates, including education and outreach to customers.
- Evaluation plans for monitoring, verifying, and improving the effectiveness of advanced rate designs.<sup>27</sup>

Finally, CUB points out that the Company's attempts to distinguish its current context as sufficiently divergent from that of the Hawaiian Electric Companies is misleading and inaccurate. First, as noted in CUB's initial comments, the Hawaii Public Utilities Commission order in question was issued in March 2019, not 2016 as indicated in Xcel's reply comments.<sup>28</sup> Second, notwithstanding Xcel's assertion to the contrary, the Hawaiian Electric Companies have offered an interim residential time-of-use (TOU) rate plan for several years, dating back to before the issuance of the Commission's

---

<sup>25</sup> CUB Initial Comments at 16.

<sup>26</sup> ELPC-VS Reply Comments at 3.

<sup>27</sup> Fresh Energy's Initial Comments at 16.

<sup>28</sup> See Xcel's Reply Comments, Attachment A at 24.



Advanced Rate Design Strategy requirement.<sup>29</sup> Most critically, the mere existence of Xcel TOU pilots or outstanding proposals for default time-based energy rate does not mitigate the need for an advanced rate design roadmap to ensure that the AGIS Initiative delivers adequate benefits to customers. Indeed, CUB reminds Xcel that its own cost-benefit analysis for certain AGIS components is less than one. Accordingly, the utility needs customers to help prove the value of its distribution system improvements and, in turn, the Commission needs transparency, visibility, and accountability from the Company to ensure those benefits are realized.

CUB is supportive of a requirement for an Advanced Rate Design Roadmap in subsequent Xcel IDPs, to include the requirements as modified by the Department in its reply comments. That said, CUB submits that an Advanced Rate Design Roadmap is needed prior to the Company's next IDP filing, given the long lead times required to evaluate and deploy advanced rate offerings for customers. The need and value of an Advanced Rate Design Roadmap is not only for the Commission and stakeholders to better understand the linkage between grid modernization investments and advanced customer rate plans, but also for the Commission and stakeholders to have a strategic view and understanding of the linkages and calibration between Xcel's disparate advanced rate pilots and future customer offerings, including its Residential Time of Use Rate Pilot program, Flex Pricing, and two-year study of the influence of price signals and other information on customer energy use.<sup>30</sup>

To that end, CUB appreciates and agrees with the Company's view that the instant IDP proceeding may not present the optimal venue by which to evaluate the Company's holistic strategic and tactical approach to advanced rate design. CUB supports a Commission requirement that the Company submit an Advanced Rate Design Roadmap in a dedicated rate design proceeding to include robust stakeholder input and discussion on the types of advanced rate designs and customer programs that can leverage AGIS investment capabilities, empower customers, and more cost-effectively meet grid needs.

## **VI. Conclusion and Recommendations**

As noted in our initial comments, the value of AMI is predicated upon Xcel's realization of customer benefits. The Commission must ensure that the Company is acting timely and responsibly to achieve and credit customers with the full value promised through AMI implementation.

In this spirit, we offer the following recommendations:

- Although CUB maintains that the AGIS Initiative costs should be recovered through the Company's MYRP and not certified for recovery through the TCR rider, we support the Department's recommendation that the **Commission refer Xcel's AGIS Initiative proposal to the OAH for a contested case hearing for further record development.**
- **The Commission should engage with stakeholders to facilitate harmonization of IDP, IRP, and MYRP processes,** by properly setting the system frameworks and expectations (system plans, as discussed above), now, that would inform future MYRPs and could support alignment of performance incentive mechanisms.

---

<sup>29</sup> See Hawaiian Electric's Time-of-Use Program, available at <https://www.hawaiianelectric.com/products-and-services/save-energy-and-money/time-of-use-program>.

<sup>30</sup> See Xcel's Reply Comments, Attachment A at 23.

- The Commission should require the imposition of fixed and variable cost recovery caps as well as the development of a methodology to ensure that benefits are contemporaneously realized by customers.
- The Commission should mandate that the Company develop an Advanced Rate Design Roadmap, as a condition of IDP acceptance, that explains how Xcel will leverage the technological and data capabilities of advanced meters – a foundational component of Xcel's grid modernization effort – through rate design to benefit customers and support the Company's distribution system planning and operations. Such an Advanced Rate Design Roadmap should include:
  - Xcel's current advanced rate designs and demand management programs;
  - A summary of industry best practices;
  - A timeline and implementation plan (including education and outreach) for the Company to offer updated dynamic rates for all residential and commercial customers (including, the introduction of time-varying rates), which should include demand response offerings;
  - Potential low-income rate reform options;
  - Enrollment mechanisms for convenient customer participation;
  - Evaluation plans for monitoring, verifying, and improving the effectiveness of advanced rate designs; and
  - Opportunities for utilizing distributed energy resources and/or beneficial electrification technologies in conjunction with planned dynamic rates and/or demand management programs.

Respectfully submitted,

April 22, 2020

/s/ Annie Levenson-Falk  
 Annie Levenson-Falk  
 Executive Director  
 Citizens Utility Board of Minnesota  
 332 Minnesota St., Suite W1360  
 St. Paul, MN 55101  
 651-300-4701, ext. 1  
[annielf@cubminnesota.org](mailto:annielf@cubminnesota.org)

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_19-666_Official
Michael	Allen	michael.allen@allenergysolar.com	All Energy Solar	721 W 26th st Suite 211  Minneapolis, Minnesota 55405	Electronic Service	No	OFF_SL_19-666_Official
David	Amster Olzweski	david@mysunshare.com	SunShare, LLC	1151 Bannock St  Denver, CO 80204-8020	Electronic Service	No	OFF_SL_19-666_Official
Christopher	Anderson	canderson@allete.com	Minnesota Power	30 W Superior St  Duluth, MN 558022191	Electronic Service	No	OFF_SL_19-666_Official
Ellen	Anderson	ellena@umn.edu	325 Learning and Environmental Sciences	1954 Buford Ave  Saint Paul, MN 55108	Electronic Service	No	OFF_SL_19-666_Official
Alison C	Archer	aarcher@misoenergy.org	MISO	2985 Ames Crossing Rd  Eagan, MN 55121	Electronic Service	No	OFF_SL_19-666_Official
Mara	Ascheman	mara.k.ascheman@xcenergy.com	Xcel Energy	414 Nicollet Mall Fl 5  Minneapolis, MN 55401	Electronic Service	No	OFF_SL_19-666_Official
Donna	Attanasio	dattanasio@law.gwu.edu	George Washington University	2000 H Street NW  Washington, DC 20052	Electronic Service	No	OFF_SL_19-666_Official
John	Bailey	bailey@ilsr.org	Institute For Local Self-Reliance	1313 5th St SE Ste 303  Minneapolis, MN 55414	Electronic Service	No	OFF_SL_19-666_Official
Sara	Baldwin Auck	sarab@irecusa.org	Interstate Renewable Energy Council, Inc.	PO Box 1156  Latham, NY 12110	Electronic Service	No	OFF_SL_19-666_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Gail	Baranko	gail.baranko@xcelenergy.com	Xcel Energy	414 Nicollet Mall 7th Floor  Minneapolis, MN 55401	Electronic Service	No	OFF_SL_19-666_Official
Jessica L.	Bayles	Jessica.Bayles@stoel.com	Stoel Rives LLP	1150 18th St NW Ste 325  Washington, DC 20036	Electronic Service	No	OFF_SL_19-666_Official
James J.	Bertrand	james.bertrand@stinson.com	STINSON LLP	50 S 6th St Ste 2600  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-666_Official
Derek	Bertsch	derek.bertsch@mrenergy.com	Missouri River Energy Services	3724 West Avera Drive PO Box 88920 Sioux Falls, SD 57109-8920	Electronic Service	No	OFF_SL_19-666_Official
William	Black	bblack@mmua.org	MMUA	Suite 400 3025 Harbor Lane North Plymouth, MN 554475142	Electronic Service	No	OFF_SL_19-666_Official
Kenneth	Bradley	kbradley1965@gmail.com		2837 Emerson Ave S Apt CW112  Minneapolis, MN 55408	Electronic Service	No	OFF_SL_19-666_Official
Elizabeth	Brama	ebrama@taftlaw.com	Taft Stettinius & Hollister LLP	2200 IDS Center 80 South 8th Street Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-666_Official
Jon	Brekke	jbrekke@grenergy.com	Great River Energy	12300 Elm Creek Boulevard  Maple Grove, MN 553694718	Electronic Service	No	OFF_SL_19-666_Official
Sydney R.	Briggs	sbriggs@swce.coop	Steele-Waseca Cooperative Electric	2411 W. Bridge St PO Box 485 Owatonna, MN 55060-0485	Electronic Service	No	OFF_SL_19-666_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Mark B.	Bring	mbring@otpc.com	Otter Tail Power Company	215 South Cascade Street PO Box 496 Fergus Falls, MN 565380496	Electronic Service	No	OFF_SL_19-666_Official
Christina	Brusven	cbrusven@fredlaw.com	Fredrikson Byron	200 S 6th St Ste 4000  Minneapolis, MN 554021425	Electronic Service	No	OFF_SL_19-666_Official
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_19-666_Official
Jessica	Burdette	jessica.burdette@state.mn.us	Department of Commerce	85 7th Place East Suite 500 St. Paul, MN 55101	Electronic Service	No	OFF_SL_19-666_Official
Jason	Burwen	j.burwen@energystorage.org	Energy Storage Association	1155 15th St NW, Ste 500  Washington, DC 20005	Electronic Service	No	OFF_SL_19-666_Official
LORI	CLOBES	lclobes@mienergy.coop	MiEnergy Cooperative	31110 COOPERATIVE WAY  PO BOX 626 RUSHFORD, MN 55971	Electronic Service	No	OFF_SL_19-666_Official
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_19-666_Official
Douglas M.	Carnival	dmc@mcgrannshea.com	McGrann Shea Carnival Straughn & Lamb	N/A	Electronic Service	No	OFF_SL_19-666_Official
Ray	Choquette	rchoquette@agp.com	Ag Processing Inc.	12700 West Dodge Road PO Box 2047 Omaha, NE 68103-2047	Electronic Service	No	OFF_SL_19-666_Official
John	Coffman	john@johncoffman.net	AARP	871 Tuxedo Blvd.  St. Louis, MO 63119-2044	Electronic Service	No	OFF_SL_19-666_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Kenneth A.	Colburn	kcolburn@symbioticstrategies.com	Symbiotic Strategies, LLC	26 Winton Road  Meredith, NH 32535413	Electronic Service	No	OFF_SL_19-666_Official
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_19-666_Official
Riley	Conlin	riley.conlin@stoel.com	Stoel Rives LLP	33 S. 6th Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-666_Official
George	Crocker	gwillc@nawo.org	North American Water Office	PO Box 174  Lake Elmo, MN 55042	Electronic Service	No	OFF_SL_19-666_Official
Arthur	Crowell	Crowell.arthur@yahoo.com	A Work of Art Solar	14333 Orchard Rd.  Minnetonka, MN 55345	Electronic Service	No	OFF_SL_19-666_Official
David	Dahlberg	davedahlberg@nweco.com	Northwestern Wisconsin Electric Company	P.O. Box 9 104 South Pine Street Grantsburg, WI 548400009	Electronic Service	No	OFF_SL_19-666_Official
James	Denniston	james.r.denniston@xcenergy.com	Xcel Energy Services, Inc.	414 Nicollet Mall, Fifth Floor  Minneapolis, MN 55401	Electronic Service	No	OFF_SL_19-666_Official
Curt	Dieren	curt.dieren@dgr.com	L&O Power Cooperative	1302 S Union St  Rock Rapids, IA 51246	Electronic Service	No	OFF_SL_19-666_Official
Carlton	Doyle Fontaine	carlton.doyle.fontaine@senate.mn	MN Senate	75 Rev Dr Martin Luther King Jr Blvd Room G-17 St Paul, MN 55155	Electronic Service	No	OFF_SL_19-666_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Brian	Draxten	bhdraxten@otpc.com	Otter Tail Power Company	P.O. Box 496 215 South Cascade Street Fergus Falls, MN 565380498	Electronic Service	No	OFF_SL_19-666_Official
Kristen	Eide Tollefson	healingsystems69@gmail.com	R-CURE	28477 N Lake Ave  Frontenac, MN 55026-1044	Electronic Service	No	OFF_SL_19-666_Official
Rebecca	Eilers	rebecca.d.eilers@xcelenergy.com	Xcel Energy	414 Nicollet Mall - 401 7th Floor  Minneapolis, MN 55401	Electronic Service	No	OFF_SL_19-666_Official
Bob	Eleff	bob.eleff@house.mn	Regulated Industries Cmte	100 Rev Dr Martin Luther King Jr Blvd Room 600 St. Paul, MN 55155	Electronic Service	No	OFF_SL_19-666_Official
Betsy	Engelking	betsy@geronimoenergy.com	Geronimo Energy, LLC	8400 Normandale Lake Blvd  Suite 1200 Bloomington, MN 55437	Electronic Service	No	OFF_SL_19-666_Official
Oncu	Er	oncu.er@avantenergy.com	Avant Energy, Agent for MMPA	220 S. Sixth St. Ste. 1300  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-666_Official
James C.	Erickson	jericksonkbc@gmail.com	Kelly Bay Consulting	17 Quechee St  Superior, WI 54880-4421	Electronic Service	No	OFF_SL_19-666_Official
Jim	Erickson	jim.g.erickson@xcelenergy.com	Xcel Energy	414 Nicollet mall 7th Flr Minneapolis, MN 55401	Electronic Service	No	OFF_SL_19-666_Official
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_19-666_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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_19-666_Official
Nathan	Franzen	nathan@geronimoenergy.com	Geronimo Energy, LLC	8400 Normandale Lake Blvd  Suite 1200 Bloomington, MN 55437	Electronic Service	No	OFF_SL_19-666_Official
Hal	Galvin	halgalvin@comcast.net	Provectus Energy Development llc	1936 Kenwood Parkway  Minneapolis, MN 55405	Electronic Service	No	OFF_SL_19-666_Official
Edward	Garvey	edward.garvey@AESLconsulting.com	AESL Consulting	32 Lawton St  Saint Paul, MN 55102-2617	Electronic Service	No	OFF_SL_19-666_Official
Edward	Garvey	garveyed@aol.com	Residence	32 Lawton St  Saint Paul, MN 55102	Electronic Service	No	OFF_SL_19-666_Official
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_19-666_Official
Allen	Gleckner	gleckner@fresh-energy.org	Fresh Energy	408 St. Peter Street Ste 220 Saint Paul, Minnesota 55102	Electronic Service	No	OFF_SL_19-666_Official
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_19-666_Official
Timothy	Gulden	timothy.gulden@yahoo.com	Winona Renewable Energy, LLC	1449 Ridgewood Dr  Winona, MN 55987	Electronic Service	No	OFF_SL_19-666_Official
Tony	Hainault	anthony.hainault@co.hennepin.mn.us	Hennepin County DES	701 4th Ave S Ste 700  Minneapolis, MN 55415-1842	Electronic Service	No	OFF_SL_19-666_Official



First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Kim	Havey	kim.havey@minneapolismn.gov	City of Minneapolis	350 South 5th Street, Suite 315M Minneapolis, MN 55415	Electronic Service	No	OFF_SL_19-666_Official
Todd	Headlee	theadlee@dvigridsolutions.com	Dominion Voltage, Inc.	701 E. Cary Street  Richmond, VA 23219	Electronic Service	No	OFF_SL_19-666_Official
Amber	Hedlund	amber.r.hedlund@xcelenergy.com	Northern States Power Company dba Xcel Energy-Elec	414 Nicollet Mall 7th Floor Minneapolis, MN 55401	Electronic Service	No	OFF_SL_19-666_Official
Jared	Hendricks	jared.hendricks@owatonnautilities.com	Owatonna Public Utilities	PO Box 800 208 S Walnut Ave Owatonna, MN 55060-2940	Electronic Service	No	OFF_SL_19-666_Official
Annete	Henkel	mui@mutilityinvestors.org	Minnesota Utility Investors	413 Wacouta Street #230 St. Paul, MN 55101	Electronic Service	No	OFF_SL_19-666_Official
Shane	Henriksen	shane.henriksen@enbridge.com	Enbridge Energy Company, Inc.	1409 Hammond Ave FL 2  Superior, WI 54880	Electronic Service	No	OFF_SL_19-666_Official
Lynn	Hinkle	lynnh@ips-solar.com	IPS Solar	2670 Patton Rd  Roseville, MN 55113	Electronic Service	No	OFF_SL_19-666_Official
Michael	Hoppe	il23@mtn.org	Local Union 23, I.B.E.W.	932 Payne Avenue  St. Paul, MN 55130	Electronic Service	No	OFF_SL_19-666_Official
Jan	Hubbard	jan.hubbard@comcast.net		7730 Mississippi Lane  Brooklyn Park, MN 55444	Electronic Service	No	OFF_SL_19-666_Official
Geoffrey	Inge	gbinge@kinectenergy.com	Kinect Eenergy Group	777 29th St Ste 200 Boulder, CO 80303	Electronic Service	No	OFF_SL_19-666_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Casey	Jacobson	cjacobson@bepc.com	Basin Electric Power Cooperative	1717 East Interstate Avenue  Bismarck, ND 58501	Electronic Service	No	OFF_SL_19-666_Official
Ralph	Jacobson	ralphj@ips-solar.com		2126 Roblyn Avenue  Saint Paul, Minnesota 55104	Electronic Service	No	OFF_SL_19-666_Official
John S.	Jaffray	jjaffray@jirpower.com	JJR Power	350 Highway 7 Suite 236  Excelsior, MN 55331	Electronic Service	No	OFF_SL_19-666_Official
Alan	Jenkins	aj@jenkinsatlaw.com	Jenkins at Law	2950 Yellowtail Ave.  Marathon, FL 33050	Electronic Service	No	OFF_SL_19-666_Official
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_19-666_Official
Richard	Johnson	Rick.Johnson@lawmoss.com	Moss & Barnett	150 S. 5th Street Suite 1200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-666_Official
Sarah	Johnson Phillips	sarah.phillips@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-666_Official
Nate	Jones	njones@hcpd.com	Heartland Consumers Power	PO Box 248  Madison, SD 57042	Electronic Service	No	OFF_SL_19-666_Official
Michael	Kampmeyer	mkampmeyer@a-e-group.com	AEG Group, LLC	260 Salem Church Road  Sunfish Lake, Minnesota 55118	Electronic Service	No	OFF_SL_19-666_Official

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_19-666_Official
Julie	Ketchum	N/A	Waste Management	20520 Keokuk Ave Ste 200  Lakeville, MN 55044	Paper Service	No	OFF_SL_19-666_Official
Ted	Kjos	tkjos@mienergy.coop	MiEnergy Cooperative	31110 Cooperative Way PO Box 626 Rushford, MN 55971	Electronic Service	No	OFF_SL_19-666_Official
Brad	Klein	bklein@elpc.org	Environmental Law & Policy Center	35 E. Wacker Drive, Suite 1600 Suite 1600 Chicago, IL 60601	Electronic Service	No	OFF_SL_19-666_Official
Thomas	Koehler	TGK@IBEW160.org	Local Union #160, IBEW	2909 Anthony Ln  St Anthony Village, MN 55418-3238	Electronic Service	No	OFF_SL_19-666_Official
Chris	Kopel	chrisk@CMPASgroup.org	Central Minnesota Municipal Power Agency	459 S Grove St  Blue Earth, MN 56013-2629	Electronic Service	No	OFF_SL_19-666_Official
Brian	Krambeer	bkrambeer@mienergy.coop	MiEnergy Cooperative	PO Box 626 31110 Cooperative Way Rushford, MN 55971	Electronic Service	No	OFF_SL_19-666_Official
Jon	Kramer	sundialjon@gmail.com	Sundial Solar	3209 W 76th St  Edina, MN 55435	Electronic Service	No	OFF_SL_19-666_Official
Michael	Krause	michaelkrause61@yahoo.com	Kandiyo Consulting, LLC	433 S 7th Street Suite 2025 Minneapolis, Minnesota 55415	Electronic Service	No	OFF_SL_19-666_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Michael	Krikava	mkrikava@taftlaw.com	TAFT Stettinius & Hollister, LLP	2200 IDS Center 80 S 8th St Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-666_Official
Matthew	Lacey	mlacey@grenergy.com	Great River Energy	12300 Elm Creek Boulevard  Maple Grove, MN 553694718	Electronic Service	No	OFF_SL_19-666_Official
Carmel	Laney	carmel.laney@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-666_Official
Douglas	Larson	dlarson@dakotaelectric.com	Dakota Electric Association	4300 220th St W  Farmington, MN 55024	Electronic Service	No	OFF_SL_19-666_Official
James D.	Larson	james.larson@avantenergy.com	Avant Energy Services	220 S 6th St Ste 1300  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-666_Official
Peder	Larson	plarson@larkinhoffman.com	Larkin Hoffman Daly & Lindgren, Ltd.	8300 Norman Center Drive Suite 1000 Bloomington, MN 55437	Electronic Service	No	OFF_SL_19-666_Official
Dean	Leischow	dean@sunrisenrg.com	Sunrise Energy Ventures	315 Manitoba Ave  Wayzata, MN 55391	Electronic Service	No	OFF_SL_19-666_Official
Annie	Levenson Falk	annief@cupminnesota.org	Citizens Utility Board of Minnesota	332 Minnesota Street, Suite W1360  St. Paul, MN 55101	Electronic Service	No	OFF_SL_19-666_Official
Ryan	Long	ryan.j.long@xcelenergy.com	Xcel Energy	414 Nicollet Mall 401 8th Floor Minneapolis, MN 55401	Electronic Service	No	OFF_SL_19-666_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Benjamin	Lowe	N/A	Alevo USA Inc.	101 S Stratford Rd Ste 210 Winston Salem, NC 27107-4224	Paper Service	No	OFF_SL_19-666_Official
Susan	Ludwig	sludwig@mnpower.com	Minnesota Power	30 West Superior Street Duluth, MN 55802	Electronic Service	No	OFF_SL_19-666_Official
Kavita	Maini	kmairi@wi.rr.com	KM Energy Consulting, LLC	961 N Lost Woods Rd Oconomowoc, WI 53066	Electronic Service	No	OFF_SL_19-666_Official
Pam	Marshall	pam@energycents.org	Energy CENTS Coalition	823 7th St E St. Paul, MN 55106	Electronic Service	No	OFF_SL_19-666_Official
Mary	Martinka	mary.a.martinka@xcelenergy.com	Xcel Energy Inc	414 Nicollet Mall 7th Floor Minneapolis, MN 55401	Electronic Service	No	OFF_SL_19-666_Official
Samuel	Mason	smason@beltramelectric.com	Beltrami Electric Cooperative, Inc.	4111 Technology Dr. NW PO Box 488 Bemidji, MN 56619-0488	Electronic Service	No	OFF_SL_19-666_Official
Gregg	Mast	gmast@cleanenergyeconomy.org	Clean Energy Economy Minnesota	4237 24th Avenue S Minneapolis, MN 55406	Electronic Service	No	OFF_SL_19-666_Official
Dave	McNary	David.McNary@hennepin.us	Hennepin County DES	701 Fourth Ave S Ste 700 Minneapolis, MN 55415-1842	Electronic Service	No	OFF_SL_19-666_Official
John	McWilliams	John.McWilliams@DairylandPower.com	Dairyland Power Cooperative	3200 East Ave SPO Box 817 La Crosse, WI 54601-7227	Electronic Service	No	OFF_SL_19-666_Official
Thomas	Melone	Thomas.Melone@AllcoUS.com	Minnesota Go Solar LLC	222 South 9th Street Suite 1600 Minneapolis, Minnesota 55120	Electronic Service	No	OFF_SL_19-666_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Brian	Meloy	brian.meloy@stinson.com	STINSON LLP	50 S 6th St Ste 2600  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-666_Official
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_19-666_Official
Stacy	Miller	stacy.miller@minneapolismn.gov	City of Minneapolis	350 S. 5th Street Room M 301 Minneapolis, MN 55415	Electronic Service	No	OFF_SL_19-666_Official
David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St  Duluth, MN 558022093	Electronic Service	No	OFF_SL_19-666_Official
Dalene	Monsebroten	dalene.monsebroten@nmpagency.com	Northern Municipal Power Agency	123 2nd St W  Thief River Falls, MN 56701	Electronic Service	No	OFF_SL_19-666_Official
Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP	33 South Sixth St Ste 4200  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-666_Official
Heidi	Nelson	Heidi.nelson@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-666_Official
Carl	Nelson	cnelson@mncee.org	Center for Energy and Environment	212 3rd Ave N Ste 560  Minneapolis, MN 55401	Electronic Service	No	OFF_SL_19-666_Official
Ben	Nelson	benn@cmpasgroup.org	CMMPA	459 South Grove Street  Blue Earth, MN 56013	Electronic Service	No	OFF_SL_19-666_Official
Dale	Niezwaag	dniezwaag@bepec.com	Basin Electric Power Cooperative	1717 East Interstate Avenue  Bismarck, ND 58503	Electronic Service	No	OFF_SL_19-666_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency	220 South Sixth Street Suite 1300 Minneapolis, Minnesota 55402	Electronic Service	No	OFF_SL_19-666_Official
Sephra	Ninow	sephra.ninow@energycenter.org	Center for Sustainable Energy	426 17th Street, Suite 700  Oakland, CA 94612	Electronic Service	No	OFF_SL_19-666_Official
Rolf	Nordstrom	rnordstrom@gpisd.net	Great Plains Institute	2801 21ST AVE S STE 220  Minneapolis, MN 55407-1229	Electronic Service	No	OFF_SL_19-666_Official
Samantha	Norris	samanthanorris@alliantenergy.com	Interstate Power and Light Company	200 1st Street SE PO Box 351  Cedar Rapids, IA 524060351	Electronic Service	No	OFF_SL_19-666_Official
David	O'Brien	david.obrien@navigant.com	Navigant Consulting	77 South Bedford St Ste 400  Burlington, MA 01803	Electronic Service	No	OFF_SL_19-666_Official
Jeff	O'Neill	jeff.oneill@ci.monticello.mn.us	City of Monticello	505 Walnut Street Suite 1 Monticello, Minnesota 55362	Electronic Service	No	OFF_SL_19-666_Official
Russell	Olson	rolson@hcpd.com	Heartland Consumers Power District	PO Box 248  Madison, SD 570420248	Electronic Service	No	OFF_SL_19-666_Official
Carol A.	Overland	overland@legalelectric.org	Legalelectric - Overland Law Office	1110 West Avenue  Red Wing, MN 55066	Electronic Service	No	OFF_SL_19-666_Official
Dan	Patry	dpatry@sunedison.com	SunEdison	600 Clipper Drive  Belmont, CA 94002	Electronic Service	No	OFF_SL_19-666_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Jeffrey C	Paulson	jeff.jcplaw@comcast.net	Paulson Law Office, Ltd.	4445 W 77th Street Suite 224 Edina, MN 55435	Electronic Service	No	OFF_SL_19-666_Official
Joyce	Peppin	joyce@mrea.org	Minnesota Rural Electric Association	11640 73rd Ave N  Maple Grove, MN 55369	Electronic Service	No	OFF_SL_19-666_Official
Mary Beth	Peranteau	mperanteau@wheelerlaw.com	Wheeler Van Sickle & Anderson SC	44 E. Mifflin Street, 10th Floor  Madison, WI 53703	Electronic Service	No	OFF_SL_19-666_Official
Jennifer	Peterson	jjpeterson@mnpower.com	Minnesota Power	30 West Superior Street  Duluth, MN 55802	Electronic Service	No	OFF_SL_19-666_Official
Hannah	Polikov	hpolikov@aee.net	Advanced Energy Economy Institute	1000 Vermont Ave, Third Floor  Washington, DC 20005	Electronic Service	No	OFF_SL_19-666_Official
David G.	Prazak	dprazak@otpc.com	Otter Tail Power Company	P.O. Box 496 215 South Cascade Street Fergus Falls, MN 565380496	Electronic Service	No	OFF_SL_19-666_Official
Gregory	Randa	granda@lakecountrypower.com	Lake Country Power	26039 Bear Ridge Drive  Cohasset, MN 55721	Electronic Service	No	OFF_SL_19-666_Official
Mark	Rathbun	mrathbun@greenergy.com	Great River Energy	12300 Elm Creek Blvd  Maple Grove, MN 55369	Electronic Service	No	OFF_SL_19-666_Official
Michael	Reinertson	michael.reinertson@avantenergy.com	Avant Energy	220 S. Sixth St. Ste 1300  Minneapolis, Minnesota 55402	Electronic Service	No	OFF_SL_19-666_Official



First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
John C.	Reinhardt	N/A	Laura A. Reinhardt	3552 26th Ave S Minneapolis, MN 55406	Paper Service	No	OFF_SL_19-666_Official
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_19-666_Official
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_19-666_Official
Isabel	Ricker	ricker@fresh-energy.org	Fresh Energy	408 Saint Peter Street Suite 220 Saint Paul, MN 55102	Electronic Service	No	OFF_SL_19-666_Official
Amanda	Rome	amanda.rome@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 5 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_19-666_Official
Robert K.	Sahr	bsahr@eastriver.coop	East River Electric Power Cooperative	P.O. Box 227 Madison, SD 57042	Electronic Service	No	OFF_SL_19-666_Official
Richard	Savelkoul	rsavelkoul@martinsquires.com	Martin & Squires, P.A.	332 Minnesota Street Ste W2750 St. Paul, MN 55101	Electronic Service	No	OFF_SL_19-666_Official
Thomas	Scharff	thomas.scharff@versoco.com	Verso Corp	600 High Street Wisconsin Rapids, WI 54495	Electronic Service	No	OFF_SL_19-666_Official
Larry L.	Schedin	Larry@LLSResources.com	LLS Resources, LLC	332 Minnesota St, Ste W1390 St. Paul, MN 55101	Electronic Service	No	OFF_SL_19-666_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Christopher	Schoenherr	cp.schoenherr@smmpa.org	SMMPA	500 First Ave SW Rochester, MN 55902-3303	Electronic Service	No	OFF_SL_19-666_Official
Kay	Schraeder	kschraeder@minnkota.com	Minnkota Power	5301 32nd Ave S Grand Forks, ND 58201	Electronic Service	No	OFF_SL_19-666_Official
Dean	Sedgwick	Sedgwick@Itascapower.com	Itasca Power Company	PO Box 455 Spring Lake, MN 56680	Electronic Service	No	OFF_SL_19-666_Official
Maria	Seidler	maria.seidler@dom.com	Dominion Energy Technology	120 Tredegar Street Richmond, Virginia 23219	Electronic Service	No	OFF_SL_19-666_Official
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th Pl E Ste 350 Saint Paul, MN 55101	Electronic Service	No	OFF_SL_19-666_Official
Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates	7400 Lyndale Ave S Ste 190 Richfield, MN 55423	Electronic Service	Yes	OFF_SL_19-666_Official
David	Shaffer	shaff081@gmail.com	Minnesota Solar Energy Industries Project	1005 Fairmount Ave Saint Paul, MN 55105	Electronic Service	No	OFF_SL_19-666_Official
Patricia	Sharkey	psharkey@environmentallawcounsel.com	Midwest Cogeneration Association.	180 N. LaSalle Street Suite 3700 Chicago, Illinois 60601	Electronic Service	No	OFF_SL_19-666_Official
Bria	Shea	bria.e.shea@xcelenergy.com	Xcel Energy	414 Nicollet Mall Minneapolis, MN 55401	Electronic Service	No	OFF_SL_19-666_Official
Doug	Shoemaker	dougs@charter.net	Minnesota Renewable Energy	2928 5th Ave S Minneapolis, MN 55408	Electronic Service	No	OFF_SL_19-666_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Audra	Skalet	askalet@mienergy.coop	MiEnergy Cooperative	31110 Cooperative Way PO Box 626 Rushford, MN 55971	Electronic Service	No	OFF_SL_19-666_Official
Anne	Smart	anne.smart@chargepoint.com	ChargePoint, Inc.	254 E Hacienda Ave  Campbell, CA 95008	Electronic Service	No	OFF_SL_19-666_Official
Trevor	Smith	trevor.smith@avantenergy.com	Avant Energy, Inc.	220 South Sixth Street Suite 1300 Minneapolis, Minnesota 55402	Electronic Service	No	OFF_SL_19-666_Official
Joshua	Smith	joshua.smith@sierraclub.org		85 Second St FL 2  San Francisco, California 94105	Electronic Service	No	OFF_SL_19-666_Official
Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.	76 W Kellogg Blvd  St. Paul, MN 55102	Electronic Service	No	OFF_SL_19-666_Official
Ken	Smith	ken.smith@ever-greenenergy.com	Ever Green Energy	305 Saint Peter St  Saint Paul, MN 55102	Electronic Service	No	OFF_SL_19-666_Official
Beth H.	Soholt	bsoholt@windonthewires.org	Wind on the Wires	570 Asbury Street Suite 201  St. Paul, MN 55104	Electronic Service	No	OFF_SL_19-666_Official
Benjamin	Stafford	bstafford@cleanenergyeconymn.org	Clean Energy Economy Minnesota	400 South 4th St Ste 401-202 Minneapolis, MN 55415	Electronic Service	No	OFF_SL_19-666_Official
Sky	Stanfield	stanfield@smwlaw.com	Shute, Mihaly & Weinberger	396 Hayes Street  San Francisco, CA 94102	Electronic Service	No	OFF_SL_19-666_Official
Tom	Stanton	tstanton@nrri.org	NRRI	1080 Carmack Road  Columbus, OH 43210	Electronic Service	No	OFF_SL_19-666_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Byron E.	Starns	byron.starns@stinson.com	STINSON LLP	50 S 6th St Ste 2600  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-666_Official
James M	Strommen	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered	200 S 6th St Ste 470  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-666_Official
Eric	Swanson	eswanson@winthrop.com	Winthrop & Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_19-666_Official
Thomas P.	Sweeney III	tom.sweeney@easycleanenergy.com	Clean Energy Collective	P O Box 1828  Boulder, CO 80306-1828	Electronic Service	No	OFF_SL_19-666_Official
Lynnette	Sweet	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7  Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_19-666_Official
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_19-666_Official
Pat	Treseler	pat.jcplaw@comcast.net	Paulson Law Office LTD	4445 W 77th Street Suite 224 Edina, MN 55435	Electronic Service	No	OFF_SL_19-666_Official
Lise	Trudeau	lise.trudeau@state.mn.us	Department of Commerce	85 7th Place East Suite 500 Saint Paul, MN 55101	Electronic Service	No	OFF_SL_19-666_Official
Karen	Turnboom	karen.turnboom@versocom.com	Verso Corporation	100 Central Avenue  Duluth, MN 55807	Electronic Service	No	OFF_SL_19-666_Official
Andrew	Twite	twite@fresh-energy.org	Fresh Energy	408 St. Peter Street, Ste. 220  St. Paul, MN 55102	Electronic Service	No	OFF_SL_19-666_Official

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_19-666_Official
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_19-666_Official
Nikhil	Vijaykar	NVijaykar@elpc.org	Enviornental Law & Policy Center	N/A	Electronic Service	No	OFF_SL_19-666_Official
Curt	Volkman	curt@newenergy-advisors.com	Fresh Energy	N/A	Electronic Service	No	OFF_SL_19-666_Official
Jonathan	Wallach	Jwallach@resourceinsight.com	Resource Insight, Inc.	5 Water St.  Arlington, MA 02476	Electronic Service	No	OFF_SL_19-666_Official
Roger	Warehime	roger.warehime@owatonnautilities.com	Owatonna Public Utilities	208 South WalnutPO Box 800  Owatonna, MN 55060	Electronic Service	No	OFF_SL_19-666_Official
Jenna	Warmuth	jwarmuth@mnpower.com	Minnesota Power	30 W Superior St  Duluth, MN 55802-2093	Electronic Service	No	OFF_SL_19-666_Official
Scott M.	Wilensky	scott.wilensky@xcelenergy.com	Xcel Energy	7th Floor 414 Nicollet Mall Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_19-666_Official
Samantha	Williams	swilliams@nrdc.org	Natural Resources Defense Council	20 N. Wacker Drive Ste 1600 Chicago, IL 60606	Electronic Service	No	OFF_SL_19-666_Official
Joseph	Windler	jwindler@winthrop.com	Winthrop & Weinstine	225 South Sixth Street, Suite 3500  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-666_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Robyn	Woeste	robynwoeste@alliantenergy.com	Interstate Power and Light Company	200 First St SE Cedar Rapids, IA 52401	Electronic Service	No	OFF_SL_19-666_Official
Yochi	Zakai	yzakai@smwlaw.com	SHUTE, MIHALY & WEINBERGER LLP	396 Hayes Street San Francisco, CA 94102	Electronic Service	No	OFF_SL_19-666_Official
Thomas J.	Zaremba	TZaremba@wheelerlaw.com	WHEELER, VAN SICKLE & ANDERSON	44 E. Mifflin Street, 10th Floor Madison, WI 53703	Electronic Service	No	OFF_SL_19-666_Official
Christopher	Zibart	czibart@atcllc.com	American Transmission Company LLC	W234 N2000 Ridgeview Pkwy Court Waukesha, WI 53188-1022	Electronic Service	No	OFF_SL_19-666_Official
Patrick	Zomer	Patrick.Zomer@lawmoss.com	Moss & Barnett a Professional Association	150 S. 5th Street, #1200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-666_Official