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August 28, 2020

—Via Electronic Filing—

Will Seuffert
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101

RE: COMPLIANCE – PROCEDURAL PATHS FORWARD
INTEGRATED DISTRIBUTION PLAN AND AGIS CERTIFICATION REQUEST &
TRANSMISSION COST RECOVERY RIDER
DOCKET NOS. E002/M-19-666 & E002/M-20-____

Dear Mr. Seuffert:

Northern States Power Company, doing business as Xcel Energy, submits to the Minnesota Public Utilities Commission the enclosed Procedural Paths Forward Petition in accordance with the Commission's July 23, 2020 ORDER ACCEPTING INTEGRATED DISTRIBUTION PLAN, MODIFYING REPORTING REQUIREMENTS, AND CERTIFYING CERTAIN GRID MODERNIZATION PROJECTS.

Specifically, Order Point No. 13 requires the Company to file preferred procedural paths forward 60 days prior to a petition to seek rider recovery for the costs associated with its Advanced Grid Intelligence and Security (AGIS) investments certified in the proceeding, with one option being a contested case.

Pursuant to Minn. Stat. § 216.17, subd. 3, we have electronically filed this document with the Minnesota Public Utilities Commission, and copies have been served on the parties on the attached service list. Please contact Jody Londo at (612) 330-5601 or jody.l.londo@xcelenergy.com or me at (612) 330-6064 or bria.e.shea@xcelenergy.com if you have any questions regarding this filing.

Sincerely,

/s/

BRIA E. SHEA
DIRECTOR, REGULATORY & STRATEGIC ANALYSIS

Enclosure
c: Service List

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BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION

Katie J. Sieben	Chair
Valerie J. Means	Commissioner
Matthew Schuerger	Commissioner
Joseph K. Sullivan	Commissioner
John A. Tuma	Commissioner

IN THE MATTER OF XCEL ENERGY'S
INTEGRATED DISTRIBUTION PLAN AND
ADVANCED GRID INTELLIGENCE AND
SECURITY CERTIFICATION REQUEST

DOCKET NOS. E002/M-19-666

IN THE MATTER OF THE PETITION OF
NORTHERN STATES POWER COMPANY FOR
APPROVAL OF THE TRANSMISSION COST
RECOVERY RIDER REVENUE
REQUIREMENTS FOR 2021 AND REVISED
ADJUSTMENT FACTORS

E002/M-20-____

COMPLIANCE FILING

Northern States Power Company, doing business as Xcel Energy, submits to the Minnesota Public Utilities Commission this compliance filing, outlining potential procedural paths forward for review of our recently-certified Advanced Metering Infrastructure (AMI) and Field Area Network (FAN) investments in accordance with the Commission's July 23, 2020 ORDER ACCEPTING INTEGRATED DISTRIBUTION PLAN, MODIFYING REPORTING REQUIREMENTS, AND CERTIFYING CERTAIN GRID MODERNIZATION PROJECTS.

Specifically, Order Point 13 requires:

60 days prior to a petition to seek rider recovery for AGIS costs, Xcel Energy shall file preferred procedural paths forward with one option being a contested case. The Commission will make a procedural and scoping decision prior to the consideration of a rider recovery determination. The Executive Secretary is authorized to establish a comment and reply schedule prior to the procedural and scoping hearing.

In this compliance filing we outline three potential procedural paths for the Commission to consider our request for cost recovery associated with our AMI and FAN components of our Advanced Grid Intelligence and Security (AGIS) initiative, as follows: (1) standard Miscellaneous Filing procedural process, (2) Miscellaneous Filing process that includes Company-sponsored workshops and/or technical

conferences on key aspects of our request, and (3) a contested case, as required by the Order.

Our filings leading up to the Commission's certification decision on our AMI and FAN investments provided robust information that met all of the information requirements for an advanced grid *cost recovery* proposal. We therefore expect the information we will submit in conjunction with our cost recovery request for AMI and FAN will be largely the same, regardless of the procedural path. This means that parties will have had this information for a full year at the point we expect to submit our request for cost recovery through the Transmission Cost Recovery Rider in early November 2020. Consequently, we believe a standard miscellaneous filing procedural process is appropriate. That said, we offer several alternatives for the Commission to consider.

I. STANDARD MISCELLANEOUS FILING PROCESS

Advanced grid investments certified by the Commission under Minn. Stat. § 216b.2425 are eligible for cost recovery through the Transmission Cost Recovery (TCR) Rider as provided in Minn. Stat. § 216B.16, subd. 7b. TCR cost recovery is proposed in the form of a Miscellaneous filing, which is subject to the Commission's Rules for utility proceedings, practices, and procedure as prescribed in Minn. R. Chapter 7829. Specifically, Minn. R. 7829.1400, subp. 1 specifies that initial comments on a miscellaneous filing are due within 30 days of its filing with the Commission, unless there is a Commission order or notice that establishes a different comment period; subp. 4 provides that reply comments are generally due ten days from the expiration of the original comment period – again, unless the Commission determines otherwise.

The Company's past TCR Rider miscellaneous filings have generally involved somewhat longer periods of time for initial and reply comments. That said, and as we noted previously, the information we will submit for our certified AMI and FAN projects was robust and met all of the requirements for AGIS cost recovery requests, so will largely be the same as we submitted with our certification request in November 2019. With our current plans to submit our TCR cost recovery proposal in early November 2020, parties will have had the information—and opportunity to conduct discovery related to the information—for a full year. We therefore believe a somewhat expedited schedule for comments and replies would be appropriate. We suggest 60 days for initial comments and 30 days for reply comments. This would allow parties ample time to consider the relatively narrow set of additional information the Commission specified we include with our cost recovery request in its July 23, 2020 Order certifying AMI and FAN.

II. TECHNICAL CONFERENCE

As we outlined in our Reply Comments, the Commission has at times supplemented the general procedural process associated with miscellaneous filings, convening directly or directing the Company to convene technical conferences or workshops to explore certain issues. As we discussed, we would support an approach with our AMI and FAN cost recovery proposal similar to that used in our Metro Emissions Reduction Plan (MERP) Rider proceeding to provide interested parties with the opportunity to fully assess the Company's proposed investments and narrow the issues before the Commission.¹

While we continue to believe that our cost recovery request is most appropriately reviewed according to miscellaneous filing procedures as discussed above, we believe a "hybrid" process such as we outline in this section this would be more productive and timely than a contested case. To this end, we outline a stakeholder engagement process and associated procedural timeline for the Commission to consider.

A. Overview

Xcel Energy would host a series of virtual public forums to facilitate discussions and educate and solicit input from interested stakeholders with respect to its recently certified AMI and FAN investments. These meetings would be held in the approximately 60 days surrounding the Company's TCR cost recovery proposal – covering key aspects of our investment proposals that were the subject of broad stakeholder interest, specific issues the Department suggested should be the subject of a contested case, and/or specific stakeholder or informational directives from the Commission's Order certifying our proposed AMI and FAN investments, as follows:

Meeting #	Topic	Date
1	AMI and FAN Technologies and Timeline	October 2020
2	Customer Strategy/Programs	Mid-Nov 2020
3	Investment Financials, CBA, Estimated Cost Impacts	Late-Nov 2020
4	Metrics and performance evaluations, and other customer protections	Mid-Dec 2020

B. Workshop Content

In summary, Workshop 1 sets the table – outlining our AGIS strategy, ADMS & APT status, discusses the AMI & FAN technologies, our selection process (including

¹ See Xcel Energy Reply Comments at page 28, Docket No. E002/M-19-666 (April 10, 2020).

alternatives we examined), current implementation timeline, and associated customer communications and implementation impacts. Workshops 2-4 review aspects of our AMI & FAN cost recovery proposal contained in our November 6, 2013 TCR filing. We provide a high-level summary of the content for each of the proposed Workshops below.

1. AMI and FAN Technologies and Timeline

In this session, we would provide a status update on our AGIS efforts and outline the stakeholder engagement roadmap on our AMI and FAN proposals. We would also have our experts discuss the following, encouraging stakeholders to ask questions and provide feedback:

- AMI and FAN Technologies
 - Present selected technologies and capabilities
 - Explain selection process, including alternatives
 - Explain actions or mechanisms to manage costs
- Implementation timeline and customer communications
 - Customer Notice Plan for AMI Installation²
 - Billing content variance and AMI opt-out proposal

2. Customer Strategy/Programs

In this workshop, we will discuss our customer strategy and how we intend to maximize the benefits our AMI and FAN investments for our customers. Taking from the record leading up to certification of AMI and FAN, we propose to engage with stakeholders on the following in this session:

- Customer Data Access Requirements and Rights, including our intentions regarding:³
 - Terms for inadvertent data release
 - Green Button Connect My Data after smart meter deployment
 - Home Area Network
 - Format(s) for providing customers with customer usage data and rate schedules
 - Potential enhancements to Saver's Switch, and the timing of any enhancements
 - Third-Party Service and Data Sharing Plans including whether such plans would result in revenues that would offset costs or reduce rates;

² DOC Initial Comments, at 24.

³ DOC Initial Comments, at 24; CUB Initial Comments, at 14-16; City of Minneapolis Initial Comments, at 8-9.

- Programs and Services: Specific plans and timelines for future customer offerings and system capabilities and their implications (including recommendations on whether Commission approval is required or warranted).⁴ With this, we would discuss any plans associated with the following:
 - *Service Tier Plans*: potential new options and pricing options for levels of system service expected to be enabled by the AGIS Initiative, including identification of the impacts on non-participant ratepayers, opt-out provisions, etc.⁵
 - Remote Connect/Disconnect Procedures⁶
- Our Rates/Advanced Rate Design Roadmap that we will have filed October 1, 2020.
- Distributed Generation Interconnection Agreement and Process Modifications⁷
- Identification of any known future AGIS Initiative-related investment costs that would be needed to maximize the potential of AMI and FAN, as outlined in our certification proceeding.

3. *AMI and FAN Financials*

This session will explore the costs presented in our TCR petition and the cost benefit analyses for AMI and FAN, as follows:

- Delineation of project costs, scope, and expected functions, including but not limited to:⁸
 - Clearly identified costs, including the following subcategories of Company costs:
 - Total revenue requirements on total-company and MN-jurisdictional bases (including identification of the MN jurisdictional allocator used)

⁴ IDP, Attachment M1 - Gersack Direct, at 44, 123, 144-154, and 187; Attachment N3, at 70. The Department is aware that Xcel has drafted proposed plans for several areas of expected system performance or customer participation (opt-out drafts, customer privacy, customer education and awareness, etc.) however, those plans are draft form only, have had no vetting by stakeholders, and have no process for public, stakeholder, or Commission review and/or approval. While it would be inefficient and potentially impossible to have pre-approval of all of these plans (or all details) prior to approval or cost recovery, it is reasonable to require at least some expectations for content, timing, and agreement as to the level of Commission oversight as conditions of the initial approval.

⁵ DOC Initial Comments, at 24.

⁶ DOC Initial Comments, at 24.

⁷ DOC Initial Comments, at 24.

⁸ Item 3 is a combination of DOC, OAG-RUD, and XLI cost information requests in Initial Comments, modified and combined by the Department. See DOC Initial Comments, at 21, 24; OAG-RUD Initial Comments, dated March 17, 2020, at 4; and XLI Initial Comments, at 7.

- Incremental/new capital costs and depreciation lives and support for the depreciation lives
 - Incremental expenses and revenue (all expenses and revenues not already in rates, including expenses that are in rates that will be reduced (i.e. all changes in expenses and revenues)
- Cost-Benefit Analysis – approach, model assumptions, cost inputs, and associated qualitative and quantitative benefits
 - Cost allocation options, including outline of bill impacts for each customer class over an initial five-year period,^{9,10} including impacts of distribution investments on transmission-level customers.¹¹

4. *Metrics and Other Customer Protections*

In this session, we will engage with stakeholders on the specific AMI and/or FAN metrics, detailed methods for evaluating performance, and consumer protections or other conditions, including costs caps that were part of our TCR proposal, as follows:

- Metrics, Baselines, and Targets for System Performance: including baseline data for performance evaluation and reporting plan (or proposal for how advanced grid metrics will be tied to or incorporated into to the Commission’s Performance Incentives Mechanisms proceeding) including a minimum 1.5% reduction in customer energy consumption from IVVO technologies^{12,13}
- Explore cost caps
 - Fixed cost recovery caps for AMI and FAN capital costs (no more than the lower of actual costs incurred or costs as proposed in Xcel’s 2019 IDP)¹⁴
 - Variable cost recovery caps, including O&M and labor, for AMI and

⁹ XLI Initial Comments, at 7 (modified).

¹⁰ Xcel noted that it is intending to develop advanced rate design plans once the majority of meters are installed, however, more than half of the AGIS investment will have already been made and potentially recovered from ratepayers by that time (estimated to be end of 2024) and therefore, it is uncertain how long those advanced rate design proposals will take to implement either during or after new meter installation. Currently, the TOU Pilot that was scheduled to start on April 1, 2020—and was planned to inform development of additional advanced rate designs—has been delayed due to the COVID19 pandemic. Therefore, questions exist regarding the current bill impacts for all customer classes as well as additional uncertainty surrounding the future customer benefits of advanced rate design. See DOC Attachment 2, Xcel Letter Pilot Postponement filed in Docket No. E002/M-17-775, dated March 18, 2020.

¹¹ XLI Initial Comments, at 7 (modified).

¹² See generally Commission Investigation to Identify and Develop Performance Metrics and, Potentially, Incentives for Xcel Energy’s Electric Utility Operations, dated September 22, 2017, Docket No. E002/CI-17-401.

¹³ OAG-RUD Initial Comments, at 4-5; Fresh Energy Initial Comments, at 14 and 16-17; ELPC/Vote Solar Initial Comments, at 17.

¹⁴ City of Minneapolis Initial Comments, at 11 (modified); CUB Initial Comments, at 11 (modified).

FAN (no more than the lower of actual incurred costs or Xcel's variable costs as proposed in the 2019 IDP, applied on a per-meter basis)¹⁵

- Explore methodologies and/or mechanisms (including a pass-through) to pass the savings and revenues associated with the AGIS Initiative on to the Company's customers in a reasonable timeframe¹⁶
- Other necessary conditions for customer value and ratepayer protection¹⁷

C. Proposed Procedural Timeline

We outline below a proposed procedural schedule that would start with the first Workshop approximately 2-3 weeks in advance of our TCR Rider petition filing – with additional Workshops leading into a written comments and replies process that would start *after* the Workshops and conclude in mid-March 2021, as follows:

Procedural Step	Timing
Workshop 1 – Technologies and Implementation	October 15, 2020
Department Report Due ¹⁸	November 1, 2020
Expected Xcel Energy TCR Filing	November 6, 2020
Workshop 2 – Customer Programs and Services	November 13, 2020
Workshop 3 – AMI & FAN Financials and CBAs	November 20, 2020
Discovery/Focused Technical Discussions	<i>November 20 – December 15, 2020</i>
Workshop 4 – Metrics and Customer Protections	December 15, 2021
Discovery/Focused Technical Discussions	<i>December 15, 2020 – January 15, 2021</i>
Initial Comments	February 1, 2021
Reply Comments	March 1, 2021
Supplemental Reply Comments	March 15, 2021

We note additionally that the process we propose also includes time in between the Workshops for parties to engage in discovery and for the Company to otherwise work with parties toward further understanding of our proposal and narrowing of issues.

¹⁵ CUB Initial Comments, at 11 (modified).

¹⁶ DOC Initial Comments, at 21, 24; CUB Initial Comments, at 18.

¹⁷ DOC Initial Comments, at 21.

¹⁸ The Commission requests that the Department file a report by November 1, 2020, that includes recommendations on specific metrics, detailed methods for evaluating performance, and consumer protections or other conditions, including cost caps, that should be applied to the certified projects. The report should be informed by a stakeholder process and will be made part of the record for any future cost recovery proceedings. Xcel must participate in the stakeholder process, which must be open to all interested parties, and must fully cooperate with the Department.

III. CONTESTED CASE

As noted in our April 10, 2020 Reply Comments in this Docket, we do not believe a contested case under Minn. R. 7829.1000 is warranted in connection with the Company's request for rider recover for AGIS costs because there are no contested material facts in this matter. That said, should the Commission determine that a contested case is appropriate for a rider recovery proceeding related to AGIS, we believe the schedule for such a proceeding likely could be expedited.

Because we filed our request for certification of the AGIS investments pursuant to Minn. Stat. § 216B.2425, subd. 2(e), in this docket coincident with our withdrawn 2019 electric rate case, our certification request also included testimony supporting a request for cost recovery of the AGIS investments. This information complied with the requirements the Commission's September 27, 2019 Order Authorizing Rider Recovery, Setting Return on Equity, and Setting Filing Requirements in Docket No. E002/M-17-797, which required among other things that "[i]f and when Xcel requests cost recovery for Advanced Grid Intelligence and Security investments, the filing must include a business case and comprehensive assessment of qualitative and quantitat[iv]e benefits to customers[.]"

As a result, the direct testimony we likely would file in a contested case would largely be the same as that filed in support of our certification request. Given the passage of time, we may need to file supplemental witness testimony to update our request, but this likely would not be extensive and could be produced in an abbreviated timeframe. Relatedly, participants in a contested case will have had access to the bulk of our direct testimony for over a year and, therefore, should be able to produce responsive testimony in a similarly shortened period of time.

Although we expect that the exact schedule, procedure, and set of issues to be determined in a contested case would be set by an administrative law judge at a prehearing conference, we believe the over schedule of a contested case related to AGIS investments could be relatively short. We believe the matter could be heard and the administrative law judge's report could be issued in as little as six months. To be clear, a contested case is not our preferred procedural path forward, but should the Commission determine it is appropriate, we believe an expeditious schedule is possible and preferable.

CONCLUSION

We appreciate the opportunity to provide a recommended procedural path forward. We believe a written comments and replies process consistent with Minn. R. 7829.1400, subp. 1 and typical with a miscellaneous filing is appropriate. A contested case is not our preferred procedural path forward, but should the Commission determine it is appropriate, we believe an expeditious schedule is possible and preferable. We are open to a process that would supplement a written comments and replies process with workshops and/or technical conferences that would provide interested parties with the opportunity to fully assess our proposed AMI and FAN investments and narrow the issues before the Commission.

Dated: August 28, 2020

Northern States Power Company

CERTIFICATE OF SERVICE

I, Paget Pengelly, hereby certify that I have this day served copies of the foregoing document on the attached list of persons.

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

xx electronic filing

**Docket Nos. E002/M-20-____
 E002/M-19-666
 E002/M-19-721
 E002/GR-19-564
 Xcel Energy's Miscellaneous Electric Service List**

Dated this 28th day of August 2020

/s/

Paget Pengelly
Regulatory Administrator

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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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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
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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_19-721_M-19-721
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Thomas	Koehler	TGK@IBEW160.org	Local Union #160, IBEW	2909 Anthony Ln St Anthony Village, MN 55418-3238	Electronic Service	No	OFF_SL_19-721_M-19-721
Michael	Krikava	mkrikava@taftlaw.com	Taft Stettinius & Hollister LLP	2200 IDS Center 80 S 8th St Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-721_M-19-721
Douglas	Larson	dlarson@dakotaelectric.co m	Dakota Electric Association	4300 220th St W Farmington, MN 55024	Electronic Service	No	OFF_SL_19-721_M-19-721
Peder	Larson	plarson@larkinhoffman.co m	Larkin Hoffman Daly & Lindgren, Ltd.	8300 Norman Center Drive Suite 1000 Bloomington, MN 55437	Electronic Service	No	OFF_SL_19-721_M-19-721
Kavita	Maini	kmairi@wi.rr.com	KM Energy Consulting, LLC	961 N Lost Woods Rd Oconomowoc, WI 53066	Electronic Service	No	OFF_SL_19-721_M-19-721
Pam	Marshall	pam@energycents.org	Energy CENTS Coalition	823 7th St E St. Paul, MN 55106	Electronic Service	No	OFF_SL_19-721_M-19-721
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_19-721_M-19-721
Stacy	Miller	stacy.miller@minneapolism n.gov	City of Minneapolis	350 S. 5th Street Room M 301 Minneapolis, MN 55415	Electronic Service	No	OFF_SL_19-721_M-19-721
David	Moeller	dmoeller@allte.com	Minnesota Power	30 W Superior St Duluth, MN 558022093	Electronic Service	No	OFF_SL_19-721_M-19-721
Andrew	Moratzka	andrew.moratzka@stoel.co m	Stoel Rives LLP	33 South Sixth St Ste 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-721_M-19-721

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David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency	220 South Sixth Street Suite 1300 Minneapolis, Minnesota 55402	Electronic Service	No	OFF_SL_19-721_M-19-721
Carol A.	Overland	overland@legalelectric.org	Legalelectric - Overland Law Office	1110 West Avenue Red Wing, MN 55066	Electronic Service	No	OFF_SL_19-721_M-19-721
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_19-721_M-19-721
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_19-721_M-19-721
Richard	Savelkoul	rsavelkoul@martinsquires.com	Martin & Squires, P.A.	332 Minnesota Street Ste W2750 St. Paul, MN 55101	Electronic Service	No	OFF_SL_19-721_M-19-721
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th Pl E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_19-721_M-19-721
Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.	76 W Kellogg Blvd St. Paul, MN 55102	Electronic Service	No	OFF_SL_19-721_M-19-721
Byron E.	Starns	byron.starns@stinson.com	STINSON LLP	50 S 6th St Ste 2600 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-721_M-19-721
James M	Strommen	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered	200 S 6th St Ste 470 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-721_M-19-721
Eric	Swanson	eswanson@winthrop.com	Winthrop & Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_19-721_M-19-721

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Lynnette	Sweet	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_19-721_M-19-721
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_19-721_M-19-721
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_19-721_M-19-721
Joseph	Windler	jwindler@winthrop.com	Winthrop & Weinstine	225 South Sixth Street, Suite 3500 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-721_M-19-721
Patrick	Zomer	Patrick.Zomer@lawmoss.com	Moss & Barnett a Professional Association	150 S. 5th Street, #1200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-721_M-19-721

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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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_19-564_Official
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Michael	Krikava	mkrikava@taftlaw.com	Taft Stettinius & Hollister LLP	2200 IDS Center 80 S 8th St Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-564_Official

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Carol A.	Overland	overland@legalelectric.org	Legalelectric - Overland Law Office	1110 West Avenue Red Wing, MN 55066	Electronic Service	No	OFF_SL_19-564_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_19-564_Official
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Michael	Hoppe	il23@mtn.org	Local Union 23, I.B.E.W.	932 Payne Avenue St. Paul, MN 55130	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Elec_Xcel Miscl Electric
Alan	Jenkins	aj@jenkinsatlaw.com	Jenkins at Law	2950 Yellowtail Ave. Marathon, FL 33050	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Elec_Xcel Miscl Electric
Richard	Johnson	Rick.Johnson@lawmoss.com	Moss & Barnett	150 S. 5th Street Suite 1200 Minneapolis, MN 55402	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Elec_Xcel Miscl Electric
Sarah	Johnson Phillips	sarah.phillips@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Elec_Xcel Miscl Electric
Mark J.	Kaufman	mkaufman@ibewlocal949.org	IBEW Local Union 949	12908 Nicollet Avenue South Burnsville, MN 55337	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Elec_Xcel Miscl Electric
Thomas	Koehler	TGK@IBEW160.org	Local Union #160, IBEW	2909 Anthony Ln St Anthony Village, MN 55418-3238	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Elec_Xcel Miscl Electric
Michael	Krikava	mkrikava@taftlaw.com	Taft Stettinius & Hollister LLP	2200 IDS Center 80 S 8th St Minneapolis, MN 55402	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Elec_Xcel Miscl Electric

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Douglas	Larson	dlarson@dakotaelectric.com	Dakota Electric Association	4300 220th St W Farmington, MN 55024	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Elec_Xcel Miscl Electric
Peder	Larson	plarson@larkinhoffman.com	Larkin Hoffman Daly & Lindgren, Ltd.	8300 Norman Center Drive Suite 1000 Bloomington, MN 55437	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Elec_Xcel Miscl Electric
Kavita	Maini	kmairi@wi.rr.com	KM Energy Consulting, LLC	961 N Lost Woods Rd Oconomowoc, WI 53066	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Elec_Xcel Miscl Electric
Pam	Marshall	pam@energycents.org	Energy CENTS Coalition	823 7th St E St. Paul, MN 55106	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Elec_Xcel Miscl Electric
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	GEN_SL_Northern States Power Company dba Xcel Energy-Elec_Xcel Miscl Electric
Stacy	Miller	stacy.miller@minneapolismn.gov	City of Minneapolis	350 S. 5th Street Room M 301 Minneapolis, MN 55415	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Elec_Xcel Miscl Electric
David	Moeller	dmoeller@allte.com	Minnesota Power	30 W Superior St Duluth, MN 558022093	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Elec_Xcel Miscl Electric
Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP	33 South Sixth St Ste 4200 Minneapolis, MN 55402	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Elec_Xcel Miscl Electric
David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency	220 South Sixth Street Suite 1300 Minneapolis, Minnesota 55402	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Elec_Xcel Miscl Electric
Carol A.	Overland	overland@legalelectric.org	Legalelectric - Overland Law Office	1110 West Avenue Red Wing, MN 55066	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Elec_Xcel Miscl Electric

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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	No	GEN_SL_Northern States Power Company dba Xcel Energy-Elec_Xcel Misl Electric
Kevin	Reuther	kreuther@mncenter.org	MN Center for Environmental Advocacy	26 E Exchange St, Ste 206 St. Paul, MN 551011667	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Elec_Xcel Misl Electric
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Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th PI E Ste 350 Saint Paul, MN 55101	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Elec_Xcel Misl Electric
Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.	76 W Kellogg Blvd St. Paul, MN 55102	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Elec_Xcel Misl Electric
Byron E.	Starns	byron.starns@stinson.com	STINSON LLP	50 S 6th St Ste 2600 Minneapolis, MN 55402	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Elec_Xcel Misl Electric
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Joseph	Windler	jwindler@winthrop.com	Winthrop & Weinstine	225 South Sixth Street, Suite 3500 Minneapolis, MN 55402	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Elec_Xcel Misc Electric
Patrick	Zomer	Patrick.Zomer@lawmoss.com	Moss & Barnett a Professional Association	150 S. 5th Street, #1200 Minneapolis, MN 55402	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Elec_Xcel Misc Electric