

June 30, 2020

PUBLIC DOCUMENT

Mr. Will Seuffert
Executive Secretary
Minnesota Public Utilities Commission
121 Seventh Place East, Suite 350
St. Paul, Minnesota 55101

RE: **PUBLIC Comments of the Minnesota Department of Commerce, Division of Energy Resources**
Docket No. E002/M-15-111, E017/M-15-112, E015/M-15-120, E002/M-17-817, E002/M-18-643,
E002/M/19-186

Dear Mr. Seuffert,

On June 10, 2020, the Minnesota Public Utilities Commission (Commission) issued a *Notice of Comment Period* for the Annual Electric Vehicle Program Reports filed in the above-referenced dockets. The Minnesota Department of Commerce, Division of Energy Resources (Department) offers the following comments on the annual reports submitted by Xcel Energy, Otter Tail Power Company and Minnesota Power. The Department recommends **acceptance** of the reports, and is available to answer any questions the Commission may have.

Sincerely,

/s/Susan L. Peirce
Rate Analyst Coordinator

Matthew Landi
Rate Analyst

SLP/ar
Attachment



Before the Minnesota Public Utilities Commission

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

Docket Nos. E002/M-15-111, E017/M-15-112, E015/M-15-120, E002/M-17-817,
E002/M-18-643, E002/M-19-186

I. BACKGROUND

The 2014 Legislature passed Minn. Stat. §216B.1614 (the EV Statute) requiring each electric investor-owned utility (IOU) to file an Electric Vehicle tariff (EV tariff) for the purchase of electricity for recharging electric vehicles. The statute applies to Minnesota Power (MP), Xcel Energy (Xcel), and Otter Tail Power Company (OTP).

On June 22, 2015, the Minnesota Public Utilities Commission (Commission) issued an *Order Approving Tariffs and Requiring Filings* in the above-referenced dockets.¹

In these same dockets, the Commission issued its December 12, 2019 *Order Accepting Filings and Establishing Requirements for Additional Filings* in which it set out compliance filing requirements. Specifically, the Commission required each of the utilities to include the information set forth in Minn. Stat. §216B.1614, Subd. 3(1) and (2), and the following information on a per-quarter basis:

- a. The amount of energy sold in on- and off-peak periods, if applicable;
- b. The number of customers choosing the renewable-source option; and
- c. The status of the communication costs tracker account, if applicable.

In addition, the Commission directed MP to file, in the first half of 2020, at least one additional EV program addressing residential charging. The Commission also directed Xcel to file a pilot or program addressing residential charging by mid-September 2020.

Xcel Energy subsequently filed and received Commission approval for three separate EV pilot programs: Residential EV Service Pilot Program (Docket No. E002/M-17-817), Fleet EV Service Pilot (Docket No. E002/M-18-643), and a Residential EV Subscription Service Pilot (Docket No. E002/M-19-186).

On June 10, 2020, the Commission issued a *Notice of Comment Period* requesting comments on whether the Commission should accept the EV annual reports submitted by MP, OTP and Xcel, and whether there are any other issues, concerns, or comments on utilities' ongoing EV program and pilot reports.

¹ In the Matter of Northern States Power Company d/b/a Xcel Energy's Petition for Approval of a Residential Electric Vehicle Charging Tariff, Docket No. E002/M-15-111; In the Matter of Otter Tail Power Company's Request for Approval of its Off-Peak Electric Vehicle Rider, Docket No. E017/M-15-112; In the Matter of Minnesota Power's Petition for Approval of a Residential Off-Peak Electric Vehicle Services Tariff, Docket No. E015/M-15-120.

Analysts assigned: Susan Peirce & Matthew Landi

Page 3

II. DEPARTMENT ANALYSIS

The Department reviewed the annual reports for all three utilities and concludes that the utilities have complied with the Commission's Orders. Therefore, the Department recommends that the Commission accept the reports. The Department provides a brief summary of each utility's report below:

A. Minnesota Power

MP reported that one additional customer enrolled in its EV Tariff during the reporting period (May 2019 – April 2020) for a total of 5 customers. None of the customers currently participating in the EV Tariff has chosen the renewable source option. MP reported that 12,071 kWh, or 82 percent, of the usage during the past twelve months occurred during off-peak periods.²

MP provided details on its outreach and education efforts, including a list of public events at which it provided materials to educate its customers about EVs. The Department concludes that MP has complied with the Commission's annual reporting requirements and recommends acceptance of its annual EV report.

In its December 12, 2019 Order, the Commission directed MP to file "at least one additional EV program addressing residential charging" in the first half of 2020. To date, the Company has not submitted any filings addressing residential EV charging. The Department requests that, in reply comments, MP provide an update on how it intends to meet the Commission's directive on residential charging.

B. Otter Tail Power Company

OTP had a total of 8 customers on its Off-Peak EV Tariff as of April 2020, up from 5 customers in May 2019. The Company reported a total of 23,613 kWh in associated electric usage, all of which was during off-peak hours. Under OTP's EV tariff, service is only energized and available during the off-peak period from 10 pm to 6 am. Two of OTP's customers offset their usage through the Company's Tailwinds renewable energy program.

OTP also has filed a petition for approval of an Electric Vehicle Direct Current Fast Charging Time of Day Pilot program that is pending before the Commission (Docket No. E017/M-20-181).

² MP filed a correction to Table 1: Total Amount of Electricity Sold by Month to correct the column labels for on- and off-peak energy sold. The original table had the column labels reversed.

Analysts assigned: Susan Peirce & Matthew Landi

Page 4

C. Xcel Energy

Xcel has a number of existing and proposed programs for EV customers, including:

- Residential EV Charging Tariff (Docket No. E002/M-15-111)
- Residential EV Service Pilot (Docket No. E002/M-17-817)
- Fleet EV Service and Public Charging Pilots (Docket No. E002/M-18-643)
- Residential EV Subscription Service (Docket No. E002/M-19-186)

1. Residential EV Charging Tariff (Docket No. E002/M-15-111)

The Residential EV Charging Tariff is the first of Xcel's EV tariffs, and was approved in 2015. The Residential EV Charging tariff requires residential customers to install a second meter, and offers on- and off-peak rates for charging. As of April 2020, Xcel reported a total of 707 customers on its Residential EV Charging tariff up from 473 customers in April 2019. On average, 93 percent of the charging has taken place during the off-peak period (hours outside the on-peak period of 9 am to 9 pm non-holiday weekdays). As of March 2020, Xcel reported that 48 customers were enrolled in Windsource with their participation in the Residential EV Charging tariff. No customers on the EV tariff were enrolled in the Company's Renewable*Connect program.

The Company continued to engage in numerous outreach activities to inform customers of the availability of the EV charging options, as well as developing various on-line tools to educate and inform customers. In total, Xcel reported spending \$288,006 between May 2019 and April 2020 to support its outreach and educational activities.

2. Residential EV Service Pilot (Docket No. E002/M-17-817)

The Residential EV Service Pilot began in August 2018, with participation capped at 100 customers. Currently 93 customers take service under the Pilot. The EV Service Pilot differs from the Residential EV Charging tariff by bundling payment for the EV charger into the monthly payment rather than requiring upfront payment. The Company offers a pre-payment option for the charger along with the monthly bundled option, but reported that the majority of participants chose the monthly option. Because the Pilot is nearly fully enrolled, Xcel reported that it did not incur any additional associated promotional costs.

3. Fleet EV Service and Public Charging Pilot (Docket No. E002/M-18-643)

Xcel's Fleet EV Service and Public Charging Pilot programs received Commission approval on July 17, 2019,³ but only the Fleet EV Service Pilot has launched with only one participant at the time of Xcel's EV report.⁴ Xcel explained that growth of both pilots would occur as a result of contract negotiations, and that there are challenges to reaching agreement on a number of specific details particular to each

³ *Order Approving Pilots with Modifications, Authorizing Deferred Accounting, and Setting Reporting Requirements*, Docket No. E002/M-18-643, dated July 17, 2019.

⁴ Xcel EV Report, at 21.

Analysts assigned: Susan Peirce & Matthew Landi

Page 5

participant, specifically related to the equipment at the end of each contract's term as well as state contracting restrictions.⁵

Metro Transit is Xcel's sole customer participating in the Fleet EV Service Pilot, operating eight electric buses out of Metro Transit's Heywood Garage in Minneapolis and the Brooklyn Center Transit Center.⁶ From July 2019 through April 30, 2020, Xcel reported that approximately **[TRADE SECRET DATA HAS BEEN EXCISED]** of Metro Transit's charging has occurred during the off-peak period.⁷ Xcel also reported information related to Metro Transit's monthly peak demand (KW), but did not include Midcontinent Independent System Operator (MISO) coincident peaks for this year's report.⁸ Xcel stated that Metro Transit's initial charging behavior reflects some of the difficulty of getting its bus charging program started, and does not expect this year's charging to be representative of future use.⁹

4. Residential EV Subscription Service (Docket No. E002/M-19-186)

Xcel's Residential EV Subscription Service Pilot received Commission approval on October 7, 2019¹⁰ and launched in early February 2020.¹¹ The pilot charges customers a flat monthly rate for off-peak charging based on Xcel's estimate of electricity consumption and EV use. Xcel's monthly subscription fee is based on the 340-kWh-per-month estimate. Customers are charged on a per-kWh basis for electricity consumed outside of the off-peak window. As of April 30, 2020, Xcel reported that there were 53 customers enrolled in the program, 48 of whom chose the bundled option that allows the customer to pay for the EV charger monthly.¹²

Xcel reported that average customer energy usage has been 235 kWh per month, compared to the estimated customer energy usage of 340 kWh per month.¹³ Xcel attributes a slowdown in interest in the program and a decrease in driving (and thus, energy usage) to the COVID-19 pandemic, and stated that it is assessing how to adjust the program based on the decrease in customer need for unlimited charging during this time.¹⁴ Additionally, Xcel reported that approximately 185 kWh of energy usage occurred during the on-peak period for March and April, whereas 10,973 kWh of energy usage occurred during the off-peak period for the same months (an on-peak percentage of approximately 1.66 percent).¹⁵

⁵ Xcel EV Report, at 22.

⁶ Xcel EV Report, at 22.

⁷ Xcel EV Report, at 22.

⁸ Xcel EV Report, at 24.

⁹ Xcel EV Report, at 22.

¹⁰ *Order Approving Pilot with Modifications, and Setting Reporting Requirements*, Docket No. E002/M-19-186, dated October 7, 2019.

¹¹ Xcel EV Report, at 17.

¹² Xcel EV Report, at 17.

¹³ Xcel EV Report, at 18.

¹⁴ Xcel EV Report, at 18, 20-21.

¹⁵ Xcel EV Report, at 18.

Analysts assigned: Susan Peirce & Matthew Landi

Page 6

III. DEPARTMENT RECOMMENDATION

The Department recommends that the Commission accept Minnesota Power, Otter Tail Power, and Xcel Energy's annual reports on electric vehicle programs and pilots.

The Department requests that, in reply comments, Minnesota Power provide an update on its plans to file an additional EV charging option.

/ar

CERTIFICATE OF SERVICE

I, Sharon Ferguson, hereby certify that I have this day, served copies of the following document on the attached list of persons by electronic filing, certified mail, e-mail, or by depositing a true and correct copy thereof properly enveloped with postage paid in the United States Mail at St. Paul, Minnesota.

**Minnesota Department of Commerce
Public Comments**

**Docket No. E002/M-15-111, E017/M-15-112, E015/M-15-120, E002/M-17-817,
E002/M-18-643, and E002/M-19-186**

Dated this **30th** day of **June 2020**

/s/Sharon Ferguson

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Eric	Swanson	eswanson@winthrop.com	Winthrop & Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_17-817_M-17-817
Lynnette	Sweet	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_17-817_M-17-817

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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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_17-817_M-17-817
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_17-817_M-17-817
Joseph	Windler	jwindler@winthrop.com	Winthrop & Weinstine	225 South Sixth Street, Suite 3500 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_17-817_M-17-817
Patrick	Zomer	Patrick.Zomer@lawmoss.com	Moss & Barnett a Professional Association	150 S. 5th Street, #1200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_17-817_M-17-817

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Christopher	Anderson	canderson@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022191	Electronic Service	No	OFF_SL_18-643_Official 18-643
Alison C	Archer	aarcher@misoenergy.org	MISO	2985 Ames Crossing Rd Eagan, MN 55121	Electronic Service	No	OFF_SL_18-643_Official 18-643
Thomas	Ashley	tom@greenlots.com	Greenlots	N/A	Electronic Service	No	OFF_SL_18-643_Official 18-643
Kevin	Auerbacher	kauerbacher@tesla.com	Tesla, Inc.	1050 K Street NW, Suite 101 Washington, DC 20001	Electronic Service	No	OFF_SL_18-643_Official 18-643
Max	Baumhefner	MBAUMHEFNER@NRDC.ORG	Natural Resources Defense Council	111 Sutter St 21st Fl San Francisco, CA 94104	Electronic Service	No	OFF_SL_18-643_Official 18-643
Jessica L	Bayles	Jessica.Bayles@stoel.com	Stoel Rives LLP	1150 18th St NW Ste 325 Washington, DC 20036	Electronic Service	No	OFF_SL_18-643_Official 18-643
James J.	Bertrand	james.bertrand@stinson.com	STINSON LLP	50 S 6th St Ste 2600 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_18-643_Official 18-643
James	Canaday	james.canaday@ag.state.mn.us	Office of the Attorney General-RUD	Suite 1400 445 Minnesota St. St. Paul, MN 55101	Electronic Service	No	OFF_SL_18-643_Official 18-643
Ray	Choquette	rchoquette@agp.com	Ag Processing Inc.	12700 West Dodge Road PO Box 2047 Omaha, NE 68103-2047	Electronic Service	No	OFF_SL_18-643_Official 18-643
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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	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_18-643_Official 18-643
Riley	Conlin	riley.conlin@stoel.com	Stoel Rives LLP	33 S. 6th Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_18-643_Official 18-643
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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_18-643_Official 18-643
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 551012198	Electronic Service	No	OFF_SL_18-643_Official 18-643
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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_18-643_Official 18-643

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Brendan	Jordan	bjordan@gpisd.net	Great Plains Institute & Bioeconomy Coalition of MN	2801 21st Ave S Ste 220 Minneapolis, MN 55407	Electronic Service	No	OFF_SL_18-643_Official 18-643

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Thomas	Koehler	TGK@IBEW160.org	Local Union #160, IBEW	2909 Anthony Ln St Anthony Village, MN 55418-3238	Electronic Service	No	OFF_SL_18-643_Official 18-643
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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_18-643_Official 18-643
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Ryan	Long	ryan.j.long@xcelenergy.com	Xcel Energy	414 Nicollet Mall 401 8th Floor Minneapolis, MN 55401	Electronic Service	No	OFF_SL_18-643_Official 18-643
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Kavita	Maini	kmairi@wi.rr.com	KM Energy Consulting, LLC	961 N Lost Woods Rd Oconomowoc, WI 53066	Electronic Service	No	OFF_SL_18-643_Official 18-643
Nick	Mark	nick.mark@centerpointenergy.com	CenterPoint Energy	505 Nicollet Mall Minneapolis, MN 55402	Electronic Service	No	OFF_SL_18-643_Official 18-643
Pam	Marshall	pam@energycents.org	Energy CENTS Coalition	823 7th St E St. Paul, MN 55106	Electronic Service	No	OFF_SL_18-643_Official 18-643
Joseph	Meyer	joseph.meyer@ag.state.mn.us	Office of the Attorney General-RUD	Bremer Tower, Suite 1400 445 Minnesota Street St Paul, MN 55101-2131	Electronic Service	No	OFF_SL_18-643_Official 18-643
Kevin	Miller	kevin.miller@chargepoint.com	ChargePoint, Inc.	254 E. Hacienda Avenue Campbell, California 95008	Electronic Service	No	OFF_SL_18-643_Official 18-643
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Michael	Noble	noble@fresh-energy.org	Fresh Energy	Hamm Bldg., Suite 220 408 St. Peter Street St. Paul, MN 55102	Electronic Service	No	OFF_SL_18-643_Official 18-643
Debra	Opatz	dopatz@otpc.com	Otter Tail Power Company	215 South Cascade Street Fergus Falls, MN 56537	Electronic Service	No	OFF_SL_18-643_Official 18-643
Carol A.	Overland	overland@legalelectric.org	Legalelectric - Overland Law Office	1110 West Avenue Red Wing, MN 55066	Electronic Service	No	OFF_SL_18-643_Official 18-643
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Marcia	Podratz	mpodratz@mnpower.com	Minnesota Power	30 W Superior S Duluth, MN 55802	Electronic Service	No	OFF_SL_18-643_Official 18-643
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_18-643_Official 18-643
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_18-643_Official 18-643
Kevin	Reuther	kreuther@mncenter.org	MN Center for Environmental Advocacy	26 E Exchange St, Ste 206 St. Paul, MN 551011667	Electronic Service	No	OFF_SL_18-643_Official 18-643
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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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_18-643_Official 18-643
Timothy	Sexton	Timothy.Sexton@state.mn.us	Minnesota Department of Transportation	395 John Ireland Blvd #620 St. Paul, MN 55155-1899	Electronic Service	No	OFF_SL_18-643_Official 18-643
Anne	Smart	anne.smart@chargepoint.com	ChargePoint, Inc.	254 E Hacienda Ave Campbell, CA 95008	Electronic Service	No	OFF_SL_18-643_Official 18-643
Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.	76 W Kellogg Blvd St. Paul, MN 55102	Electronic Service	No	OFF_SL_18-643_Official 18-643
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Thomas	Tynes	jjazynka@energyfreedomcoalition.com	Energy Freedom Coalition of America	101 Constitution Ave NW Ste 525 East Washington, DC 20001	Electronic Service	No	OFF_SL_18-643_Official 18-643
Lisa	Veith	lisa.veith@ci.stpaul.mn.us	City of St. Paul	400 City Hall and Courthouse 15 West Kellogg Blvd. St. Paul, MN 55102	Electronic Service	No	OFF_SL_18-643_Official 18-643
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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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Alison C	Archer	aarcher@misoenergy.org	MISO	2985 Ames Crossing Rd Eagan, MN 55121	Electronic Service	No	OFF_SL_19-186_M-19-186
Thomas	Ashley	tom@greenlots.com	Greenlots	N/A	Electronic Service	No	OFF_SL_19-186_M-19-186
Kevin	Auerbacher	kauerbacher@tesla.com	Tesla, Inc.	1050 K Street NW, Suite 101 Washington, DC 20001	Electronic Service	No	OFF_SL_19-186_M-19-186
Max	Baumhefner	MBAUMHEFNER@NRDC.ORG	Natural Resources Defense Council	111 Sutter St 21st Fl San Francisco, CA 94104	Electronic Service	No	OFF_SL_19-186_M-19-186
Jessica L	Bayles	Jessica.Bayles@stoel.com	Stoel Rives LLP	1150 18th St NW Ste 325 Washington, DC 20036	Electronic Service	No	OFF_SL_19-186_M-19-186
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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_19-186_M-19-186
Ray	Choquette	rchoquette@agp.com	Ag Processing Inc.	12700 West Dodge Road PO Box 2047 Omaha, NE 68103-2047	Electronic Service	No	OFF_SL_19-186_M-19-186
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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_19-186_M-19-186
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Heidi	Corcoran	Heidi.Corcoran@CO.DAKOTA.MN.US	Dakota County	N/A	Electronic Service	No	OFF_SL_19-186_M-19-186
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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_19-186_M-19-186
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_19-186_M-19-186
Edward	Garvey	edward.garvey@AESLconsulting.com	AESL Consulting	32 Lawton St Saint Paul, MN 55102-2617	Electronic Service	No	OFF_SL_19-186_M-19-186
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_19-186_M-19-186
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_19-186_M-19-186

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Brendan	Jordan	bjordan@gpisd.net	Great Plains Institute & Bioeconomy Coalition of MN	2801 21st Ave S Ste 220 Minneapolis, MN 55407	Electronic Service	No	OFF_SL_19-186_M-19-186
Mark J.	Kaufman	mkaufman@ibewlocal949.org	IBEW Local Union 949	12908 Nicollet Avenue South Burnsville, MN 55337	Electronic Service	No	OFF_SL_19-186_M-19-186
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Peder	Larson	plarson@larkinhoffman.com	Larkin Hoffman Daly & Lindgren, Ltd.	8300 Norman Center Drive Suite 1000 Bloomington, MN 55437	Electronic Service	No	OFF_SL_19-186_M-19-186
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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_19-186_M-19-186
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Kavita	Maini	kmairi@wi.rr.com	KM Energy Consulting, LLC	961 N Lost Woods Rd Oconomowoc, WI 53066	Electronic Service	No	OFF_SL_19-186_M-19-186
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Pam	Marshall	pam@energycents.org	Energy CENTS Coalition	823 7th St E St. Paul, MN 55106	Electronic Service	No	OFF_SL_19-186_M-19-186

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Kevin	Miller	kevin.miller@chargepoint.com	ChargePoint, Inc.	254 E. Hacienda Avenue Campbell, California 95008	Electronic Service	No	OFF_SL_19-186_M-19-186
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