

March 8, 2021

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

RE: **Reply Comments of the Minnesota Commerce Department, Division of Energy Resources**
Docket Nos. E002/M-21-69 and E002/M-15-1089

Dear Mr. Seuffert:

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

Xcel Energy's Petition for Approval of a Credit Mechanism to Return to Customers Department of Energy Settlement Payments.

The Petition was filed on January 21, 2021 by:

Gail A. Baranko
Manager, Regulatory Projects
Xcel Energy Services, Inc. 414 Nicollet Mall, 401-7
Minneapolis, MN 55401

Comments were filed on February 26, 2021 by:

Pam Marshall
Executive Director
Energy CENTS Coalition
823 7th Street
St. Paul, MN 55106

The Department recommends that the Minnesota Public Utilities Commission (Commission) **allocate \$2 million of the eleventh DOE payment to PowerOn, borne proportionally across all customer classes. Additionally, the Commission may wish to request that Xcel provide a 50 percent match of \$1 million to its PowerOn program as well.** The Department is available to answer any questions that the Commission may have in this matter.

Sincerely,

/s/ ANGELA BYRNE
Financial Analyst

ACB/ja
Attachment



Before the Minnesota Public Utilities Commission

Reply Comments of the Minnesota Commerce Department Division of Energy Resources

Docket Nos. E002/M-21-69 and E002/M-15-1089

I. BACKGROUND INFORMATION

On January 21, 2021, Northern States Power Company, doing business as Xcel Energy (Xcel or the Company) submitted its compliance filing addressing the receipt of the eleventh DOE payment covering spent fuel storage damages incurred during 2019. The Company received \$13,130,727 on December 22, 2020, of which \$9,589,930 is applicable to Xcel's Minnesota Jurisdiction. Xcel proposed to return the eleventh DOE payment to ratepayers through a one-time bill credit.

The Department filed Comments on February 26, 2021 recommending approval of the one-time bill credit, pending the submission of additional information by Xcel.

Energy CENTS Coalition (ECC or the Organization) also filed Comments on February 26, 2021, proposing an alternative for the residential portion of the refund. ECC recommended that the Commission allow Xcel to use the residential class refund of \$2,934,126 to supplement funding for the Company's PowerOn program. ECC also recommended that Xcel be allowed two years to spend the additional funds to give time to sufficiently promote the program and enroll additional customers.

These Reply Comments are in response to ECC's recommendations regarding the residential refund.

II. DEPARTMENT ANALYSIS

The Department appreciates the discussion brought forward by ECC. Refunds, such as this eleventh DOE payment, have been important rate mitigation mechanisms to Minnesota ratepayers. However, ratepayers faced difficult economic circumstances during 2020, which have continued into 2021, due to the economic downturn caused by the COVID-19 pandemic. Specifically, increases in unemployment and under-employment means a higher number of Minnesotans are eligible for assistance programs.

In its August 26, 2020 *Notice of Comment Period* (Notice) in Docket No. E,G999/CI-20-375 (Docket 20-375), the Commission requested comments addressing whether it is "necessary for the Commission to take any additional action related to residential customer protections during the COVID-19 pandemic." The *Notice* also requested comments on potential additional actions to assist customers with unmanageable past due balances after the expiration of COVID-19 related customer protections.

In our October 19, 2020 *Comments* filed in response to the Notice, the Department recommended that the Commission direct the utilities to,¹

- provide bill inserts or other contact to ratepayers on LIHEAP assistance and the application process. Information should include any utility-specific programs that offer assistance and direction on how a customer can apply for that assistance; and
- develop and offer, to the extent not already in place, an arrearage forgiveness plan in order to assist customers with past due bills.

A. ALLOCATION OF DOE REFUND

The refund of the eleventh DOE payment presents another opportunity to focus additional relief to those who need it most. In the initial DOE refund proposal in 2011, the Commission directed Xcel to allocate \$2 million from the total refund to the Company’s PowerOn financial assistance program.² This specific allocation of funds to PowerOn was borne proportionally across all customer classes. In light of the current unique and challenging economic circumstances, the Department recommends that the Commission approve the use of \$2 million of the eleventh DOE refund payment, shared proportionally across all customer classes, for additional funding to PowerOn.

While businesses have also been hit hard economically by the pandemic, loan programs such as those through the Small Business Association and the Federal Paycheck Protection Program (PPP) have provided additional resources not generally available to residential ratepayers. Table 1 below summarizes the refund by customer class before allocating funds to PowerOn, as well as the Department’s initial calculations of the refund by customer class after the allocation to PowerOn.

Table 1: DOE Refund for Minnesota Jurisdiction by Customer Class

Customer Class	Xcel Proposed Refund by Class ³	Department Proposed Refund by Class	Department Proposed Amt to PowerOn
Residential	\$2,934,126	\$2,322,126	\$612,000
Small Non-Demand	\$296,322	\$234,522	\$61,800
Commercial & Industrial Demand	\$6,325,316	\$5,006,116	\$1,319,200
Lighting	\$34,166	\$26,966	\$7,200
Total	\$9,589,930	\$7,589,730	\$2,000,200*

*The total amount calculated for PowerOn does not equal \$2 million, due to rounding of allocation factors in Xcel’s Attachment B. The Department requests that the Company recalculate the above table with non-rounded allocator percentages in a supplemental attachment to its Reply Comments.

¹ Page 3.

² Docket No. E002/M-11-807, *Order Establishing Refund Plan*, filed December 16, 2011, Ordering Point 5.

³ Amounts and allocators per class are for the Minnesota jurisdiction and were taken from Xcel’s Attachment B.

The Department recommends that the Commission require Xcel to set aside \$2 million of this eleventh payment amount and add it to its PowerOn program within 30 days of the Commission's Order in this docket. Further, the Department recommends that Xcel file a compliance filing indicating that it has taken such action and the current funding available in the PowerOn fund.

B. PROPOSED CONTRIBUTION FROM XCEL

In addition to each customer class contributing to the PowerOn program, the Commission may wish to request that Xcel contribute \$1 million, a 50 percent match, from the Company's shareholders. Additional funding for some of our most vulnerable ratepayers is important, but considering the unprecedented year ratepayers experienced in 2020, it should not have to all come from refund owed to them. Additionally, Xcel earned significant profit in 2020, despite general declines in the economy caused by the pandemic. In its 2020 earnings call, Xcel CEO Ben Fowke stated, in part,⁴

Overall, 2020 was truly a stellar year. We executed on our business continuity plans as we kept employees and customers safe while providing reliable customer service. We're helping to jump-start the economy through our capital investment programs which create jobs and investment in our communities. And we stepped up our commitment to charitable giving to support those in need, including donating a gain of almost \$20 million from our sale of the Mankato facility.

We had a long and impressive list of accomplishments in 2020. Let me share a few of them. We delivered EPS of \$2.79 in 2020 which is the 16th consecutive year of meeting or exceeding our earnings guidance. We raised our annual dividend by \$0.10 per share, which is the 17th straight year, we've increased our dividend. And we achieved a total shareholder return of just over 7.8%, which was the second highest TSR for our peer group.

A contribution of \$1 million from Xcel's shareholders to its PowerOn program provides additional relief to the Company's most economically vulnerable ratepayers without added burden to ratepayers at large. Further, this recommendation is consistent with discussion in Docket 20-375 regarding ratepayer protections during Minnesota's Peacetime Emergency for the pandemic. If this recommendation and the \$2 million allocation of the refund are adopted, an additional \$3 million would be available to Xcel's low-income ratepayers.

⁴ Xcel Energy Inc (XEL) Q4 2020 Earnings Call Transcript, accessed March 3, 2021.

<https://www.fool.com/earnings/call-transcripts/2021/01/28/xcel-energy-inc-xel-q4-2020-earnings-call-transcri/>

With the proposed increase in funding to PowerOn recommended here, customer awareness initiatives by the Company to promote financial assistance discussed in Docket 20-375 are of utmost importance. That said, the Department does not see a need for the Commission to take specific action regarding awareness initiatives in this docket, since ordering points in this docket may be duplicative to Ordering Points in Docket 20-375. The Commission may wish to consider including a narrative in its Order discussing customer awareness initiatives that will be addressed in Docket 20-375 for the purpose of tracking between dockets.

III. CONCLUSION AND RECOMMENDATIONS

Based on the discussion above, the Department recommends that the Commission,

- approve the use of \$2 million of the eleventh DOE refund payment, shared proportionally across all customer classes, for additional funding to Xcel's PowerOn program;
- require Xcel to set aside the \$2 million of this eleventh payment amount and add it to its PowerOn program within 30 days of the Commission's Order in this docket; and
- require that Xcel file a compliance filing indicating that it has taken such action and providing the current funding available in the PowerOn fund.

The Department requests that the Company recalculate Table 1 within these Reply Comments with non-rounded allocator percentages, in a supplemental attachment to its Reply comments.

Finally, in light of unprecedented year experienced by ratepayers in 2020 due to the COVID-19 pandemic, the Commission may wish to request that Xcel contribute \$1 million, a 50 percent match, to its PowerOn program from the Company's shareholders.

/ja

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
Reply Comments**

Docket No. E002/M-21-69 and E002/M-15-1089

Dated this 8th day of March 2021

/s/Sharon Ferguson

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Sigurd W.	Anderson	mariner@eldinc.com	Engineering Lab Design	30910 716th St Lake City, MN 55041	Electronic Service	No	OFF_SL_15-1089_M-15-1089
Alison C	Archer	aarcher@misoenergy.org	MISO	2985 Ames Crossing Rd Eagan, MN 55121	Electronic Service	No	OFF_SL_15-1089_M-15-1089
Mara	Ascheman	mara.k.ascheman@xcelen ergy.com	Xcel Energy	414 Nicollet Mall Fl 5 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_15-1089_M-15-1089
Gail	Baranko	gail.baranko@xcelen ergy.com	Xcel Energy	414 Nicollet Mall 7th Floor Minneapolis, MN 55401	Electronic Service	No	OFF_SL_15-1089_M-15-1089
James J.	Bertrand	james.bertrand@stinson.co m	STINSON LLP	50 S 6th St Ste 2600 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_15-1089_M-15-1089
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	Yes	OFF_SL_15-1089_M-15-1089
John	Coffman	john@johncoffman.net	AARP	871 Tuxedo Blvd. St. Louis, MO 63119-2044	Electronic Service	No	OFF_SL_15-1089_M-15-1089
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.st ate.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_15-1089_M-15-1089
Brooke	Cooper	bcooper@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022191	Electronic Service	No	OFF_SL_15-1089_M-15-1089
James	Denniston	james.r.denniston@xcelen ergy.com	Xcel Energy Services, Inc.	414 Nicollet Mall, 401-8 Minneapolis, MN 55401	Electronic Service	Yes	OFF_SL_15-1089_M-15-1089

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Kristen	Eide Tollefson	healingsystems69@gmail.com	R-CURE	28477 N Lake Ave Frontenac, MN 55026-1044	Electronic Service	No	OFF_SL_15-1089_M-15-1089
Rebecca	Eilers	rebecca.d.eilers@xcelenergy.com	Xcel Energy	414 Nicollet Mall - 401 7th Floor Minneapolis, MN 55401	Electronic Service	No	OFF_SL_15-1089_M-15-1089
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_15-1089_M-15-1089
Edward	Garvey	garveyed@aol.com	Residence	32 Lawton St Saint Paul, MN 55102	Electronic Service	No	OFF_SL_15-1089_M-15-1089
Janet	Gonzalez	Janet.gonzalez@state.mn.us	Public Utilities Commission	Suite 350 121 7th Place East St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_15-1089_M-15-1089
Thomas P.	Harlan	harlan@mdh-law.com	Madigan, Dahl & Harlan, P.A.	222 South Ninth Street Suite 3150 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_15-1089_M-15-1089
Michael	Hoppe	lu23@ibew23.org	Local Union 23, I.B.E.W.	445 Etna Street Ste. 61 St. Paul, MN 55106	Electronic Service	No	OFF_SL_15-1089_M-15-1089
Alan	Jenkins	aj@jenkinsatlaw.com	Jenkins at Law	2950 Yellowtail Ave. Marathon, FL 33050	Electronic Service	No	OFF_SL_15-1089_M-15-1089
Richard	Johnson	Rick.Johnson@lawmoss.com	Moss & Barnett	150 S. 5th Street Suite 1200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_15-1089_M-15-1089
Sarah	Johnson Phillips	sarah.phillips@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_15-1089_M-15-1089

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_15-1089_M-15-1089
Thomas	Koehler	TGK@IBEW160.org	Local Union #160, IBEW	2909 Anthony Ln St Anthony Village, MN 55418-3238	Electronic Service	No	OFF_SL_15-1089_M-15-1089
Douglas	Larson	dlarson@dakotaelectric.com	Dakota Electric Association	4300 220th St W Farmington, MN 55024	Electronic Service	No	OFF_SL_15-1089_M-15-1089
Peder	Larson	plarson@larkinhoffman.com	Larkin Hoffman Daly & Lindgren, Ltd.	8300 Norman Center Drive Suite 1000 Bloomington, MN 55437	Electronic Service	No	OFF_SL_15-1089_M-15-1089
Philip	Mahowald	pmahowald@thejacobsonlawgroup.com	Jacobson Law Group	180 East Fifth Street Suite 940 St. Paul, MN 55101	Electronic Service	No	OFF_SL_15-1089_M-15-1089
Kavita	Maini	kmairi@wi.rr.com	KM Energy Consulting, LLC	961 N Lost Woods Rd Oconomowoc, WI 53066	Electronic Service	No	OFF_SL_15-1089_M-15-1089
Pam	Marshall	pam@energycents.org	Energy CENTS Coalition	823 7th St E St. Paul, MN 55106	Electronic Service	No	OFF_SL_15-1089_M-15-1089
Mary	Martinka	mary.a.martinka@xcelenergy.com	Xcel Energy Inc	414 Nicollet Mall 7th Floor Minneapolis, MN 55401	Electronic Service	Yes	OFF_SL_15-1089_M-15-1089
Brian	Meloy	brian.meloy@stinson.com	STINSON LLP	50 S 6th St Ste 2600 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_15-1089_M-15-1089

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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_15-1089_M-15-1089
David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022093	Electronic Service	No	OFF_SL_15-1089_M-15-1089
Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP	33 South Sixth St Ste 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_15-1089_M-15-1089
David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency	220 South Sixth Street Suite 1300 Minneapolis, Minnesota 55402	Electronic Service	No	OFF_SL_15-1089_M-15-1089
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_15-1089_M-15-1089
Carol A.	Overland	overland@legalelectric.org	Legalelectric - Overland Law Office	1110 West Avenue Red Wing, MN 55066	Electronic Service	No	OFF_SL_15-1089_M-15-1089
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_15-1089_M-15-1089
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_15-1089_M-15-1089
Amanda	Rome	amanda.rome@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 5 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_15-1089_M-15-1089
Richard	Savelkoul	rsavelkoul@martinsquires.com	Martin & Squires, P.A.	332 Minnesota Street Ste W2750 St. Paul, MN 55101	Electronic Service	No	OFF_SL_15-1089_M-15-1089

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th Pl E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_15-1089_M-15-1089
Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates	7400 Lyndale Ave S Ste 190 Richfield, MN 55423	Electronic Service	Yes	OFF_SL_15-1089_M-15-1089
Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.	76 W Kellogg Blvd St. Paul, MN 55102	Electronic Service	No	OFF_SL_15-1089_M-15-1089
Byron E.	Starns	byron.starns@stinson.com	STINSON LLP	50 S 6th St Ste 2600 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_15-1089_M-15-1089
James M	Strommen	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered	150 S 5th St Ste 700 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_15-1089_M-15-1089
Eric	Swanson	eswanson@winthrop.com	Winthrop & Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_15-1089_M-15-1089
Lynnette	Sweet	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_15-1089_M-15-1089
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_15-1089_M-15-1089
Samantha	Williams	swilliams@nrdc.org	Natural Resources Defense Council	20 N. Wacker Drive Ste 1600 Chicago, IL 60606	Electronic Service	No	OFF_SL_15-1089_M-15-1089

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Joseph	Windler	jwindler@winthrop.com	Winthrop & Weinstine	225 South Sixth Street, Suite 3500 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_15-1089_M-15-1089
Patrick	Zomer	Pat.Zomer@lawmoss.com	Moss & Barnett a Professional Association	150 S. 5th Street, #1200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_15-1089_M-15-1089

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Sigurd W.	Anderson	mariner@eldinc.com	Engineering Lab Design	30910 716th St Lake City, MN 55041	Electronic Service	No	OFF_SL_21-69_M-21-69
Alison C	Archer	aarcher@misoenergy.org	MISO	2985 Ames Crossing Rd Eagan, MN 55121	Electronic Service	No	OFF_SL_21-69_M-21-69
Mara	Ascheman	mara.k.ascheman@xcelen ergy.com	Xcel Energy	414 Nicollet Mall Fl 5 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_21-69_M-21-69
Gail	Baranko	gail.baranko@xcenergy.c om	Xcel Energy	414 Nicollet Mall 7th Floor Minneapolis, MN 55401	Electronic Service	No	OFF_SL_21-69_M-21-69
James J.	Bertrand	james.bertrand@stinson.co m	STINSON LLP	50 S 6th St Ste 2600 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-69_M-21-69
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_21-69_M-21-69
John	Coffman	john@johncoffman.net	AARP	871 Tuxedo Blvd. St. Louis, MO 63119-2044	Electronic Service	No	OFF_SL_21-69_M-21-69
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.st ate.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-69_M-21-69
Riley	Conlin	riley.conlin@stoel.com	Stoel Rives LLP	33 S. 6th Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-69_M-21-69
Brooke	Cooper	bcooper@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022191	Electronic Service	No	OFF_SL_21-69_M-21-69

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
George	Crocker	gwillc@nawo.org	North American Water Office	PO Box 174 Lake Elmo, MN 55042	Electronic Service	No	OFF_SL_21-69_M-21-69
James	Denniston	james.r.denniston@xcelenergy.com	Xcel Energy Services, Inc.	414 Nicollet Mall, 401-8 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_21-69_M-21-69
Kristen	Eide Tollefson	healingsystems69@gmail.com	R-CURE	28477 N Lake Ave Frontenac, MN 55026-1044	Electronic Service	No	OFF_SL_21-69_M-21-69
Rebecca	Eilers	rebecca.d.eilers@xcelenergy.com	Xcel Energy	414 Nicollet Mall - 401 7th Floor Minneapolis, MN 55401	Electronic Service	No	OFF_SL_21-69_M-21-69
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_21-69_M-21-69
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_21-69_M-21-69
Edward	Garvey	garveyed@aol.com	Residence	32 Lawton St Saint Paul, MN 55102	Electronic Service	No	OFF_SL_21-69_M-21-69
Edward	Garvey	edward.garvey@AESLconsulting.com	AESL Consulting	32 Lawton St Saint Paul, MN 55102-2617	Electronic Service	No	OFF_SL_21-69_M-21-69
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_21-69_M-21-69

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Thomas P.	Harlan	harlan@mdh-law.com	Madigan, Dahl & Harlan, P.A.	222 South Ninth Street Suite 3150 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-69_M-21-69
Matthew B	Harris	matt.b.harris@xcelenergy.com	XCEL ENERGY	401 Nicollet Mall FL 8 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_21-69_M-21-69
Michael	Hoppe	lu23@ibew23.org	Local Union 23, I.B.E.W.	445 Etna Street Ste. 61 St. Paul, MN 55106	Electronic Service	No	OFF_SL_21-69_M-21-69
Alan	Jenkins	aj@jenkinsatlaw.com	Jenkins at Law	2950 Yellowtail Ave. Marathon, FL 33050	Electronic Service	No	OFF_SL_21-69_M-21-69
Richard	Johnson	Rick.Johnson@lawmoss.com	Moss & Barnett	150 S. 5th Street Suite 1200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-69_M-21-69
Sarah	Johnson Phillips	sarah.phillips@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-69_M-21-69
Mark J.	Kaufman	mkaufman@ibewlocal949.org	IBEW Local Union 949	12908 Nicollet Avenue South Burnsville, MN 55337	Electronic Service	No	OFF_SL_21-69_M-21-69
Thomas	Koehler	TGK@IBEW160.org	Local Union #160, IBEW	2909 Anthony Ln St Anthony Village, MN 55418-3238	Electronic Service	No	OFF_SL_21-69_M-21-69
Peder	Larson	plarson@larkinhoffman.com	Larkin Hoffman Daly & Lindgren, Ltd.	8300 Norman Center Drive Suite 1000 Bloomington, MN 55437	Electronic Service	No	OFF_SL_21-69_M-21-69
Douglas	Larson	dlarson@dakotaelectric.com	Dakota Electric Association	4300 220th St W Farmington, MN 55024	Electronic Service	No	OFF_SL_21-69_M-21-69

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Ryan	Long	ryan.j.long@xcelenergy.com	Xcel Energy	414 Nicollet Mall 401 8th Floor Minneapolis, MN 55401	Electronic Service	No	OFF_SL_21-69_M-21-69
Philip	Mahowald	pmahowald@thejacobsonlawgroup.com	Jacobson Law Group	180 East Fifth Street Suite 940 St. Paul, MN 55101	Electronic Service	No	OFF_SL_21-69_M-21-69
Kavita	Maini	kmairi@wi.rr.com	KM Energy Consulting, LLC	961 N Lost Woods Rd Oconomowoc, WI 53066	Electronic Service	No	OFF_SL_21-69_M-21-69
Pam	Marshall	pam@energycents.org	Energy CENTS Coalition	823 7th St E St. Paul, MN 55106	Electronic Service	No	OFF_SL_21-69_M-21-69
Mary	Martinka	mary.a.martinka@xcelenergy.com	Xcel Energy Inc	414 Nicollet Mall 7th Floor Minneapolis, MN 55401	Electronic Service	No	OFF_SL_21-69_M-21-69
Brian	Meloy	brian.meloy@stinson.com	STINSON LLP	50 S 6th St Ste 2600 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-69_M-21-69
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_21-69_M-21-69
Stacy	Miller	stacy.miller@minneapolismn.gov	City of Minneapolis	350 S. 5th Street Room M 301 Minneapolis, MN 55415	Electronic Service	No	OFF_SL_21-69_M-21-69
David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022093	Electronic Service	No	OFF_SL_21-69_M-21-69
Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP	33 South Sixth St Ste 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-69_M-21-69

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_21-69_M-21-69
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_21-69_M-21-69
Carol A.	Overland	overland@legalectric.org	Legalelectric - Overland Law Office	1110 West Avenue Red Wing, MN 55066	Electronic Service	No	OFF_SL_21-69_M-21-69
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_21-69_M-21-69
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_21-69_M-21-69
Amanda	Rome	amanda.rome@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 5 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_21-69_M-21-69
Richard	Savelkoul	rsavelkoul@martinsquires.com	Martin & Squires, P.A.	332 Minnesota Street Ste W2750 St. Paul, MN 55101	Electronic Service	No	OFF_SL_21-69_M-21-69
Jessie	Seim	jessie.seim@piic.org	Prairie Island Indian Community	5636 Sturgeon Lake Rd Welch, MN 55089	Electronic Service	No	OFF_SL_21-69_M-21-69
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th PI E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-69_M-21-69

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Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates	7400 Lyndale Ave S Ste 190 Richfield, MN 55423	Electronic Service	Yes	OFF_SL_21-69_M-21-69
Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.	76 W Kellogg Blvd St. Paul, MN 55102	Electronic Service	No	OFF_SL_21-69_M-21-69
Byron E.	Starns	byron.starns@stinson.com	STINSON LLP	50 S 6th St Ste 2600 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-69_M-21-69
James M	Strommen	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered	150 S 5th St Ste 700 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-69_M-21-69
Eric	Swanson	eswanson@winthrop.com	Winthrop & Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_21-69_M-21-69
Lynnette	Sweet	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	Yes	OFF_SL_21-69_M-21-69
Thomas	Tynes	jjazyuka@energyfreedomcoalition.com	Energy Freedom Coalition of America	101 Constitution Ave NW Ste 525 East Washington, DC 20001	Electronic Service	No	OFF_SL_21-69_M-21-69
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_21-69_M-21-69
Samantha	Williams	swilliams@nrdc.org	Natural Resources Defense Council	20 N. Wacker Drive Ste 1600 Chicago, IL 60606	Electronic Service	No	OFF_SL_21-69_M-21-69

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Joseph	Windler	jwindler@winthrop.com	Winthrop & Weinstine	225 South Sixth Street, Suite 3500 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-69_M-21-69
Patrick	Zomer	Pat.Zomer@lawmoss.com	Moss & Barnett a Professional Association	150 S. 5th Street, #1200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-69_M-21-69