



Your Touchstone Energy® Cooperative 

April 30, 2021

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

**Re: Dakota Electric Association Petition to Implement a  
Limited Arrearage Forgiveness Program  
Docket No. E,G-999/CI-20-375**

Dear Mr. Seuffert:

Dakota Electric Association® (Dakota Electric® or Cooperative) submits the attached petition requesting approval to implement a Limited Arrearage Forgiveness Program as we transition from operations under pandemic conditions to normal service operations. Dakota Electric respectfully requests an expedited regulatory review of this petition to allow this program to be available in early June as we implement the Cooperative's Amended Transition Plan.

If you or your staff has any questions regarding Dakota Electric's petition, please contact me any time at (651) 463-6258 or [dlarson@dakotaelectric.com](mailto:dlarson@dakotaelectric.com).

Sincerely,

*/s/ Douglas R. Larson*

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Douglas R. Larson  
Vice President of Regulatory Services  
Dakota Electric Association  
4300 220<sup>th</sup> Street West  
Farmington, MN 55024  
651-463-6258  
dlarson@dakotaelectric.com

STATE OF MINNESOTA  
BEFORE THE  
MINNESOTA PUBLIC UTILITIES COMMISSION

IN THE MATTER OF A DAKOTA ELECTRIC  
PETITION TO CLARIFY SPECIAL FEES & CHARGES  
FOR METERS REMOVED WITHOUT AUTHORIZATION

DOCKET No. E,G-999/CI-20-375

**SUMMARY**

On April 30, 2021, Dakota Electric Association® (Dakota Electric® or Cooperative) submitted a Petition to the Minnesota Public Utilities Commission (Commission or MPUC) requesting approval to implement a Limited Arrearage Forgiveness Program as part of the process to transition from operations under pandemic conditions to normal service operations. Dakota Electric respectfully requests an expedited regulatory review of this petition to allow this program to be available in early June as we implement the Cooperative's Amended Transition Plan.

STATE OF MINNESOTA  
BEFORE THE  
MINNESOTA PUBLIC UTILITIES COMMISSION

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

IN THE MATTER OF A DAKOTA ELECTRIC  
PETITION TO CLARIFY SPECIAL FEES & CHARGES  
FOR METERS REMOVED WITHOUT AUTHORIZATION

DOCKET No. E,G-999/CI-20-375

**PETITION OF DAKOTA ELECTRIC ASSOCIATION**

**I. Introduction**

Dakota Electric Association® (Dakota Electric® or Cooperative) submits the following Petition to the Minnesota Public Utilities Commission (Commission or MPUC) requesting approval to implement a Limited Arrearage Forgiveness Program as part of the process to transition from operations under pandemic conditions to normal service operations. Dakota Electric respectfully requests an expedited regulatory review of this petition to allow this program to be available in early June as we implement the Cooperative's Amended Transition Plan.

**II. Filing Requirements**

Pursuant to Minn. Stat. § 216B.16, subd. 1 and Minn. Rule 7829.1300, Dakota Electric provides the following required general filing information.

**1. Summary of Filing (Minn. Rule 7829.1300, subp.1)**

A one paragraph summary accompanies this Petition.

**2. Service on Other Parties (Minn. Rule 7829.1300, subp. 2)**

Pursuant to Minn. Rules 7829.1300, subp. 2, Dakota Electric eFiles this Petition on the Minnesota Department of Commerce and the Office of Attorney General – Antitrust and Utilities Division. A summary of the filing prepared in accordance with Minn. Rules

7829.1300, subp. 1 is being served on Dakota Electric's general service list and the service list in Docket No. E,G-999/CI-20-375.

**3. Name, Address and Telephone Number of Utility (Minn. Rule 7829.1300, subp. 4(A))**

Dakota Electric Association  
4300 220th Street West  
Farmington, MN 55024  
(651) 463-6212

**4. Name, Address and Telephone Number of Utility Attorney (Minn. Rule 7829.1300, subp. 4(B))**

Eric F. Swanson  
Winthrop & Weinstine  
225 South Sixth Street, Suite 3500  
Minneapolis, Minnesota 55402-4629

**5. Date of Filing and Date Proposed Rate Takes Effect (Minn. Rule 7829.1300, subp. 4(C))**

This Petition is being filed on April 30, 2021. Minn. Rule 7825.3200 requires that utilities serve notice to the Commission at least 90 days prior to the proposed effective date of modified rates. Accordingly, the proposed limited Arrearage Forgiveness Program would take effect upon Commission approval, but no sooner than July 29, 2021.

However, *given the urgency of providing this Limited Arrearage Forgiveness to members as we implement the Amended Transition Plan, Dakota Electric respectfully requests that the Commission authorize an expedited regulatory review and consideration of this filing. We request Commission approval of this program by early June 2021* as we begin outreach efforts to connect our members with energy assistance agencies and establish payment plans for members with delinquent balances as outlined in our Amended Transition Plan. Dakota Electric believes our members will be best served by having this arrearage forgiveness program available as we work on establishing these payment plans.

**6. Statute Controlling Schedule for Processing the Filing (Minn. Rule 7829.1300, subp.4(D))**

This Petition is made pursuant to Minn. Stat. § 216B.16. Dakota Electric's filing falls within the definition of a "Miscellaneous Tariff Filing" under Minn. Rules 7829.0100, subp. 11. Minn. Rules 7829.1400, subp. 1 and 4 specify that comments in response to a miscellaneous filing be filed within 30 days, and reply comments be filed no later than 10 days from the expiration of the original comment period.

However, *consistent with our request for expedited regulatory review, we ask that the Commission establish written comment periods and Commission deliberation on an expedited schedule.*

**7. Utility Employee Responsible for Filing (Minn. Rule 7829.1300, subp. 4(E))**

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**8. Impact on Rates and Services (Minn. Rule 7829.1300, subp. 4(F))**

The petition will implement a Limited Arrearage Forgiveness Program as part of the process to transition from operations under pandemic conditions to normal service operations. This Arrearage Forgiveness Program will be funded (and capped) using funds from the Cooperative's operations. This program will not raise rates to any members but will provide bill payment relief to members affected by the pandemic. While the program will not affect rates, it will reduce the Cooperative's annual operating margins that would otherwise be allocated to all members.

The additional information required under Minn. Rule 7829.1300, subp. 4(F) is included throughout this Petition.

**III. Petition**

Regulatory Background – Transition Plan

On April 1, 2021, Dakota Electric submitted a Transition Plan to the Commission in Docket No. E,G-999/CI-20-375. On the topic of an arrearage forgiveness program, Dakota Electric provided the following narrative in our Transition Plan:

Not all regulated utilities are in the same financial position to absorb the financial impact of an arrearage forgiveness program or desire to implement revenue mitigation (increase) measures to fund such a program. Dakota Electric notes that we implemented final rates from our recent general rate case (Docket No. E-111/GR-19-478) on October 1, 2020. While this rate case was still being

processed, the pandemic occurred. Beginning in early 2020, utilities were asked (then required) to suspend disconnections, late fees, and other charges. At the same time, we saw shifts in member consumption. From a Cooperative business perspective, this means we are entering the first full calendar-year after the completion of the general rate case (2021) with budgeted margins significantly below where we would be during normal times. This financial position limits our ability to implement an arrearage forgiveness program.

With this perspective in mind, Dakota Electric believes we are able to fund a limited scope and duration arrearage forgiveness program. Dakota Electric has been working on the parameters for an arrearage forgiveness effort and the Board of Directors has recently authorized staff to continue such development. We note that Dakota Electric has also been in communication with Energy CENTS Coalition to help identify program parameters that work for the Cooperative and our members. Following is an outline of points being considered for the Cooperative's work-in-progress potential arrearage forgiveness program parameters.

*Program Total Funding Amount:* To be determined based on availability of funds while continuing to meet lender financial requirements. In any event, we expect that the total program funding amount will be capped at a specified level. When the funding is exhausted, the arrearage forgiveness program would end.

*Term:* August 1, 2021 to October 15, 2022 as long as program funds are available.

*Qualifying Criteria:* The Cooperative is still evaluating qualifying criteria such as whether the arrearage forgiveness should be tied to specified income thresholds, the individual delinquent balance, and the number of days delinquent.

*Forgiveness Amount:* The determination and application of individual forgiveness amounts will be influenced/determined by the ability to administer the selected method. That is, Dakota Electric has limited resources and ability to administer a new arrearage forgiveness program at the same time we expect to see significant increases in workload to establish payment plans for customers in arrears. We are also finding it could be very difficult to find a partner agency to assist in this effort. This means that the amount of individual forgiveness amounts and when it is applied will be closely linked to program administration capabilities.

*Administered by:* The program administration is yet to be determined.

Dakota Electric indicated we would continue to work on program details in anticipation of a filing to the Commission and program rollout to supplement payment plan negotiations.

#### Proposed Limited Arrearage Forgiveness Program

As promised, Dakota Electric continued to work on the details on an arrearage forgiveness program, and now submits this request for Commission approval.<sup>1</sup> Following is a review of our proposed Limited Arrearage Forgiveness Program that we believe will benefit pandemic affected members while maintaining sound financial operations for all Dakota Electric members. The description of the Cooperative's Limited Arrearage Forgiveness Program is organized as follows:

- Total Program Funding
- Term
- Administration
- Qualifying Criteria
- Individual Forgiveness Amount
- Other Parameters
- Communication and Billing

#### *Total Program Funding Amount:*

Dakota Electric proposes to provide total funding for the Limited Arrearage Forgiveness Program at an amount that will be capped at \$1 million. This funding will be treated as an expense to the Cooperative's current operations. Since the Cooperative recently completed a general rate case and implemented final rates in October 2020, we are not proposing to recover this expense through a separate line item charge to our members. While this expense will reduce our annual operating margins, we believe that such an impact will not immediately affect the minimum financial ratios we must achieve to satisfy the requirements of our lenders. Dakota Electric does not plan to hold any funds in reserve. That is, when the \$1 million funding is exhausted, the Limited Arrearage Forgiveness Program and monthly credits on member bills will end.

#### *Term:*

With our request for expedited regulatory review and consideration, we are hoping to implement the Limited Arrearage Forgiveness Program in early June 2021. We propose

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<sup>1</sup> Dakota Electric would like to thank Energy CENTS Coalition (ECC) for participating in several virtual meetings and providing perspective as we considered and developed this program. We also acknowledge, however, that our proposed program may have elements with which they do not fully agree.

that the program will continue until October 15, 2022 as long as program funds are available. This duration will provide 16 months of credits which should provide time to reduce delinquent balances prior to the start of the 2022 Cold Weather Rule season. This could also provide up to three cycles of energy assistance funding to qualifying low-income consumers as they become current.

*Administration:*

The Limited Arrearage Forgiveness Program will be administered by Dakota Electric. Our initial considerations for this program explored the possibility of using a third-party organization to administer elements of the program. However, we found that these organizations were already facing staffing constraints with limited ability to take on extra responsibilities – even if we provided funding for such administration. We note that this internal administration influences program design and implementation parameters. Dakota Electric’s Member Service Representative (MSR) staff are already busy with normal call volume of consumer questions, service changes, etc. As we look toward implementing the Transition Plan, we are also exploring short term staff redeployment to handle expected call volume increases as consumers begin receiving disconnection notices and call to make payment arrangements. The Limited Arrearage Forgiveness Program will add another layer of communication and processing to these calls. With these staffing considerations in mind – and the potential impact on call answering times – we have strived to design program details to facilitate as smooth and efficient interactions with consumers as possible under these unprecedented circumstances.

Beyond staffing impacts on program design, we also note that the Limited Arrearage Forgiveness Program will require other administrative steps to supplement the normally automated billing and collection process. That is, Dakota Electric’s Consumer Information System (CIS) and billing process is established to conform with applicable Minnesota Statutes and Rules. Dakota Electric already had to implement some alternate processes to meet modified service requirements during the pandemic. Similarly, the Transition Plan will require system accommodations and additional stand-alone manual activities separate from normal automated processes. We have identified additional stand-alone or parallel activities necessary to implement this proposed Limited Arrearage Forgiveness Program. The capability and efficiency of these additional processes, and the anticipated MSR interactions with consumers, has guided our proposed program parameters.



*Qualifying Criteria:*

Dakota Electric proposes to direct the arrearage forgiveness to accounts with delinquent balances of 91 days and greater. We believe that this threshold will reach consumers that are having more difficulty staying current for any variety of reasons during the pandemic. The credits will be provided on a first come first served basis. This approach should encourage members with delinquent balances to contact us soon to make payment arrangements. The Cooperative does not propose any other screening qualifying criteria. That is, there will be no income threshold, no minimum delinquent balance threshold, and no maximum delinquent balance threshold. The decision for no income threshold recognizes that consumers at varying income levels could be struggling during the pandemic. In addition, Dakota Electric has limited or no capability to verify reported income and any such activity would add more complexity and time to the process of establishing a payment plan and arrearage forgiveness credit.

*Individual Forgiveness Amount:*

Dakota Electric proposes to apply a monthly credit of 25% to the amount of a monthly payment that relates to the member's delinquent balance. That is, if the member enters into a payment plan that includes \$100 for the current month consumption and \$40 toward the delinquent balance, then the member would see an arrearage forgiveness credit of \$10 ( $\$40 \times 25\%$ ) applied to the delinquent balance. The credit would be applied monthly, to members who enter into and remain current on a payment plan, until the delinquent balance is zero – or until Dakota Electric has reached the overall program cap of \$1 million. Dakota Electric will not apply the discount to members that want to pay the entire delinquent balance up front in a single payment. We believe that such members have the funds to pay their bill and simply decided not to pay in the short run for any variety of reasons.

*Other Parameters:*

There are substantial federal funds available for energy assistance in Minnesota. To be sure qualifying Dakota Electric members are seeking and receiving such energy assistance, while Dakota Electric does not propose to gather or attempt to verify income, Dakota Electric proposes that members wishing to participate in the Limited Arrearage Forgiveness Program first apply for energy assistance. Dakota Electric will allow one week for members to apply for energy assistance, which the Cooperative will verify by

checking the Minnesota Department of Commerce eHeat site. This will ensure that all members eligible for assistance receive that assistance, lowering their delinquent balance and allowing Dakota Electric's arrearage forgiveness program to reach more members. During this time the Cooperative will not take any further action on disconnection. When we know if and how much assistance will be available, we will factor this assistance into the overall payment plan. Our intent is to lower the amount that our members must pay Dakota Electric for their past due balance.

Dakota Electric also intends to apply the individual member's discounted capital credits to their outstanding delinquent balance. Dakota Electric presently offers an annual payment of discounted capital credits to members who are 65 or older. The Cooperative also pays discounted capital credits to members who move and are no longer provided electric service by Dakota Electric. Applying discounted capital credits to delinquent balances (subject to authorization through a future Dakota Electric Board Resolution) is consistent with these existing practices. Applying member discounted capital credits is another way of reducing the member delinquent balance and subsequent monthly payment.

Finally, consistent with the Commission's decision on Transition Plans, if a consumer breaks the initial payment plan (or fails to make an initial payment plan and is disconnected) there is one chance to "stumble" (miss a payment) and immediately correct the situation with a new/revised payment plan and continue to qualify for the arrearage forgiveness credit. However, if the member breaks the payment plan and does not reestablish a payment plan immediately, the arrearage forgiveness credit will no longer be available to that member. It is hoped that this process will provide additional incentive to make and keep payment plans.

*Communication and Billing:*

Dakota Electric will let qualifying members know about the Limited Arrearage Forgiveness Program through a separate mailing to individual members. This will target communication only to members who are eligible for the program. The Cooperative's MSR staff will also be aware of who qualifies through phone conversations with members.

Dakota Electric members participating in the Arrearage Forgiveness Program will be able to monitor their delinquent balance monthly on their billing statement. Each bill will show the amount of the prior payment received (including the arrearage credit), the current month's consumption, and the resulting net delinquent balance.

## **Conclusion**

Based on the information contained in this filing, Dakota Electric respectfully requests that the Commission approve this petition to implement a Limited Arrearage Forgiveness Program. We further request expedited regulatory review and consideration that will allow this program to begin in early June 2021.

Dated: April 30, 2021

Respectfully Submitted,

*/s/ Douglas R. Larson*

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Douglas R. Larson  
Vice President of Regulatory Services  
Dakota Electric Association

## **Certificate of Service**

I, Melissa Cherney, hereby certify that I have this day served copies of the attached document to those on the following service list by e-filing, personal service, or by causing to be placed in the U.S. mail at Farmington, Minnesota.

**Docket No. E,G-999/CI-20-375**

Dated this 30th day of April 2021

*/s/ Melissa Cherney*

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Melissa Cherney

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Kristine	Anderson	kanderson@greatermngas.com	Greater Minnesota Gas, Inc. & Greater MN Transmission, LLC	1900 Cardinal Lane PO Box 798 Faribault, MN 55021	Electronic Service	No	OFF_SL_20-375_Official Service List
Gabriel	Chan	gabechan@umn.edu	University of Minnesota	130 Hubert H. Humphrey Center 301 19th Ave S Minneapolis, Minnesota 55455	Electronic Service	No	OFF_SL_20-375_Official Service List
Christopher	Clark	Christopher.B.Clark@xcelenergy.com	Xcel Energy	414 Nicollet Mall 5th Floor Minneapolis, MN 55401	Electronic Service	No	OFF_SL_20-375_Official Service List
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400  St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_20-375_Official Service List
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Carly	Haiby	chaiby@otpc.com	Otter Tail Power Company	215 S Cascade St  Fergus Falls, MN 56537	Electronic Service	No	OFF_SL_20-375_Official Service List

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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_20-375_Official Service List

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Maria	McCoy	maria@ilsr.org	Institute for Local Self-Reliance	2720 E 22nd St.  Minneapolis, MN 55406	Electronic Service	No	OFF_SL_20-375_Official Service List
Joseph	Meyer	joseph.meyer@ag.state.mn.us	Office of the Attorney General-RUD	Bremer Tower, Suite 1400 445 Minnesota Street St Paul, MN 55101-2131	Electronic Service	No	OFF_SL_20-375_Official Service List
Gregory C.	Miller	gmiller@dakotaelectric.com	Dakota Electric Association	4300 220th Street West  Farmington, MN 55024	Electronic Service	No	OFF_SL_20-375_Official Service List
Darrick	Moe	darrick@mrea.org	Minnesota Rural Electric Association	11640 73rd Ave N  Maple Grove, MN 55369	Electronic Service	No	OFF_SL_20-375_Official Service List
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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_20-375_Official Service List
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Garret	Senger	garret.senger@mdu.com	Great Plains Natural Gas Company	705 West Fir Ave PO Box 176 Fergus Falls, MN 56538-0176	Electronic Service	No	OFF_SL_20-375_Official Service List
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