

May 28, 2021

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

RE: **Supplemental Comments of the Minnesota Commerce Department, Division of Energy Resources**
Docket No. E002/M-20-592

Dear Mr. Seuffert:

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

Northern States Power Company d/b/a Xcel Energy's Request for Approval of AGIS Initiative Related Tariff Changes and a Variance to Commission Rules.

The Petition was filed on July 10, 2020 by:

Bria Shea
Director, Regulatory & Strategic Analysis
Xcel Energy
414 Nicollet Mall
Minneapolis, MN 55401

The Department recommends **approval with modifications**. The Department is available to answer any questions the Minnesota Public Utilities Commission may have.

Sincerely,

/s/ MATTHEW LANDI
Rates Analyst

ML/ja
Attachment



Before the Minnesota Public Utilities Commission

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

Docket No. E002/M-20-592

I. INTRODUCTION

On July 10, 2020, Northern States Power Company d/b/a Xcel Energy (Xcel or the Company) filed a Petition requesting that the Minnesota Public Utilities Commission (Commission) approve:

- an indefinite variance to Minnesota Rule 7820.3500 to allow the Company to no longer print the present and last meter reading values on bills provided to customers with advanced metering infrastructure (AMI) and non-communicating Advanced Metering Infrastructure (AMI) meters;
- Xcel's proposed additions to the Standard Bill Forms contained in its Electric Rate Book;
- the new Manual Meter Reading (MMR) tariff proposed for residential and small business customers who prefer to have a non-communicating AMI meter installed at their homes or businesses; and
- a review of the MMR tariff pricing approximately one year after the Company's broad AMI deployment is complete.

On September 23, 2020, Xcel submitted Reply Comments that were responsive to the Department's requests for additional information but maintained its request for an indefinite variance to Minnesota Rule 7820.3500 and approval of its changes to Standard Bill Forms and its proposed MMR tariff. The Department's September 9th, 2020 comments indicated that supplemental comments would be necessary in order to respond to Xcel's reply comments.

The Department provides supplemental comments below.

II. DEPARTMENT ANALYSIS

A. *OPPORTUNITY TO REVIEW XCEL'S ADVANCED GRID CUSTOMER EDUCATION AND COMMUNICATIONS PLAN*

The nature of Xcel's AMI and Field Area Network (FAN) proposals represent a significant paradigm shift in its business model and its relationship with its customers. It is paramount that its customers are fully informed and understand the implications for Xcel's plans and the capabilities of its Advanced Metering Infrastructure-Distributed Intelligence (AMI-DI) meters and FAN. The Department argues that it is essential to the public interest that Xcel provides timely and substantive information regarding its AMI and FAN proposals that encompasses both the Day 1 capabilities of these technologies and potential future capabilities.

The Department has reviewed Xcel's reply comments and contends that while it is possible to determine whether the billing variance request and the opt-out tariff are reasonable and in the public interest, the public interest is best served in using this forum as an opportunity to review Xcel's *Advanced Grid Customer Education and Communications Plan* (Communications Plan), as detailed in Schedule 8 of Attachment M1 of Xcel's 2019 Integrated Distribution Plan in Docket No. E002/M-19-666. At this time, approval of this tariff is one of the few required permissions from the Commission before meter installation. While there are on-going discussions regarding cost recovery for the AMI-DI meters and the procedural process to review Xcel's investments and plans, there is no requirement that Xcel file those petitions pre-AMI deployment, and therefore no cognizable opportunity for review of Xcel's Communications Plan before Xcel's AMI deployment begins.

Xcel indicated that this forum is not the appropriate place to address the Department's concerns: ¹

The Department's interest, on the other hand, in, for example, customer communication plan details such as whether and when we will tell customers how frequently we are recording their energy usage through the meter (i.e., 5-minute or 15- 3 minute intervals) goes beyond this petition. Such a matter is part of our mass deployment of meters – and not something unique-to or otherwise relevant to our narrow request for how the interval usage we used to calculate customer bills will be presented on the bill. It is the same case with the future HAN and DI capabilities we have foreshadowed in our overall AMI plans; neither of these are fully developed at this time, and neither is relevant to our request.

While Xcel argues that the petition before the Commission is narrow and does not encapsulate the Department's concern, the Department disagrees.

The Department contends that there has not yet been sufficient opportunity to review Xcel's Communications Plan, and such a review is in the public interest in the context of Xcel's request for a billing variance and its opt-out tariff proposal. It is crucial that Xcel's plans for its AMI-DI meters, customer education, Day 1 products and services, and functionalities are transparent to customers before Xcel rolls out its AMI-DI meters: customers need to be informed about the capabilities of the meters and the ability for real-time meter data access by the utility at the time of consideration of meter installation in order to make a determination of whether to opt-out.

The Department understands and agrees that not all functionalities and capabilities of an AMI-DI meter are known at this time, however, that does not mean that Xcel cannot inform customers of what it does know, what it is planning, and its potential scope of future services, as it has outlined in other filings to the Commission. Indeed, without providing that information, Xcel's customers would be not be making a fully informed decision on whether to install a new AMI-DI meter or to opt-out and have

¹ Xcel Reply Comments, at 2-3.

an MMR meter installed. If Xcel does not provide a customer with sufficient levels of information at the time a customer decides whether to receive an AMI-DI meter, the Company risks creating a lock-in effect: if the customer learns about the scope of Xcel's plans and future capabilities after Xcel installs the AMI-DI meters and then decides to opt-out, that customer is then subject to Xcel's proposed meter removal fee.

Xcel indicated that health concerns are the primary reason that customers opt-out of AMI, suggesting that some customers link the RF communications capabilities of the AMI-DI meters with adverse health consequences.² The Department contends that concerns over customer privacy, access to and the use of customer energy usage data (CEUD) by Xcel and potentially third-parties are among other concerns that customers may have with regard to Xcel's AMI-DI meters as well as Xcel's FAN and HAN proposals. These are potential concerns that customers may have but might not know if Xcel does not provide sufficient levels of information.

The cure to this potential lock-in effect are customer education and the provision of a sufficient amount of information. The Department contends that the instant proceeding is the appropriate venue to discuss and guide Xcel's Communications Plan. There are two primary reasons for this: (1) we are quickly approaching Xcel's scheduled implementation of its mass deployment of AMI-DI meters; and (2) there has not been a forum to date that has allowed for review of Xcel's Communications Plan.

1. The Time is Ripe for Review of Xcel's Communications Plans

In Xcel's September 23, 2020 Reply Comments, the Company indicated that it planned to begin its mass AMI deployment for Q1 2022 at the latest and was considering an accelerated deployment of Q4 2021.³ Xcel also explained that when deploying its meters, it would employ a communication strategy that provides increasingly detailed communications in a 90-60-30 days before AMI meter installation cadence.⁴

Assuming Xcel maintains a Q1 2022 target date, that strategy would need to be implemented by October 1, 2021. If we assume a Q4 2021 target date given the potential for accelerated deployment, that strategy would need to be implemented by July 1, 2021. Given the need for Commission action to compel Xcel to file its Communications Plan and provide an opportunity for review, there is very little time on the regulatory calendar to review Xcel's Communications Plan for its Q1 2022 AMI deployment date, and virtually no time for review for a Q4 2021 accelerated AMI deployment date.

² Xcel Reply Comments, at 6.

³ Xcel Reply Comments, at 9.

⁴ Xcel Initial Comments, at 16.

2. A Forum for Review of Xcel's Communications Plan Has Not Been Provided

Xcel's response to DOC IR No. 3 indicated that Xcel planned to file its Communications Plan as part of its cost recovery request for its AMI and FAN proposals. Doing so would provide a forum for review of Xcel's Communications Plan. However, to date, Xcel has not filed its cost recovery request and, further, in informal conversations with the Department, Xcel indicated that it may wait until November 2021 to file such a request. Further, in Xcel's August 28, 2020 Procedural Paths Compliance Filing in Docket Nos. E002/M-19-666 and E002/M-20-680, Xcel indicated a plan to hold technical workshops in Q1 of 2021 that discussed, in part, its Communications Plan and the instant billing variance request and AMI opt-out proposal.⁵ To date, Xcel has not hosted any technical workshops outlined in its Procedural Paths Compliance Filing.

In response to DOC IR No. 3, Xcel indicated that it had received no comments or discovery on its Communications Plan. The Department contends that due to regulatory uncertainty around the certification process and the breadth and depth of the issues involved in Xcel's 2019 IDP and certification request, it was unclear whether Xcel's Communications Plan was ripe for review.

3. Conclusion

Xcel's filings to date suggest that the Company appears to support creating an opportunity for stakeholder review of its Communications Plan. Information contained in Xcel's 2019 IDP and the Procedural Paths Compliance Filing regarding its Communications Plan suggest that the Company itself articulated providing opportunities for stakeholder review and input.

Further, in Xcel's Reply Comments in the instant proceeding, the Company indicated that it supported providing the Commission and stakeholders with its customer billing-related Communications Plan that includes consideration of the Department's questions in its overall AMI customer Communications Plan in a compliance filing in this proceeding.⁶

The Department appreciates Xcel's commitment to provide additional information for the Commission's consideration regarding its Communications Plan. The Department also understands there may be an interest in not unduly delaying the Company's AMI implementation timeline. Accordingly, the Department discusses three options to move forward below.

B. OPTIONS TO MOVE FORWARD WITH REVIEW OF XCEL'S COMMUNICATIONS PLAN

The Department articulates three potential approaches below to provide an opportunity for the Commission to express its preference for how much, if any, stakeholder outreach Xcel should be required to conduct for its Communications Plan. The Department understands that further delays to

⁵ Xcel Procedural Paths Compliance Filing, Docket Nos. E002/M-19-666 and E002/M-20-680, August 28, 2020, at 4.

⁶ Xcel Reply Comments, at 5.

the regulatory calendar may affect Xcel's current implementation plans for AMI, and therefore recommends the third approach articulated below. However, if that concern is outweighed by the Commission's preference for additional stakeholder outreach, the Department is not opposed to the first or second approaches articulated below.

The Department sees three potential approaches for the Commission to consider that provide stakeholders with an opportunity to review Xcel's Communications Plan: (1) a process involving a technical workshop for stakeholders and a Notice of Comment period; or (2) a process where Xcel consults with the Commission's Consumer Affairs Office (CAO) subject to content requirements as recommended by the Department and a Notice of Comment period; or (3) a process where Xcel consults with the Commission's CAO on its Communications Plan subject to content requirements as recommended by the Department.

All three pathways would involve delegation to the Executive Secretary for approval of the Communications Plan. Delegation to the Executive Secretary for approval of customer communications is a common practice, and is similar to what the Commission decided in approving Xcel's Residential Time-of-Use Rate Design Pilot program in Docket No. E002/M-17-775.⁷

The first approach would require Xcel to file its Communications Plan in a compliance filing within ten days of the Commission's Order in the instant proceeding and related proceedings (e.g., Docket Nos. E002/M-19-666 and E002/M-20-680). It would then require Xcel to host a technical workshop for stakeholders to gather input and solicit feedback for its Communications Plan, in the spirit of the workshop articulated by the Company in its Procedural Paths Compliance Filing.⁸ It is important to note that by offering this as an option for the Commission to consider, the Department is not endorsing the "hybrid" procedural path that Xcel outlined in its Compliance Filing nor commenting on the merits of any procedural path for the review of Xcel's AMI and FAN projects. Instead, the Department offers this as an option for the Commission to consider solely on the basis of providing a forum for stakeholder review of Xcel's Communications Plan that is consistent with a process that the Company itself articulated and proposed.

After meeting with stakeholders to discuss its Communications Plan and gathering input and feedback, Xcel would then incorporate input and feedback received and issue its updated Communications Plan in a compliance filing in the instant proceeding and other, relevant proceedings (e.g., Docket Nos. E002/M-19-666 and E002/M-20-680). A 30-day Notice of Comment period could then be issued to provide additional feedback and help ensure that the Company was responsive to feedback received at the workshop. Xcel could then be required to incorporate feedback or provide any reasons why it did

⁷ ORDER APPROVING PILOT PROGRAM, SETTING REPORTING REQUIREMENTS, AND DENYING CERTIFICATION REQUEST, dated August 7, 2018, Docket Nos. E002/M-17-775 and E002/M-17-776. See page 6: "Xcel must also file its proposed bill insert language for approval by the Commission's Executive Secretary." See also Order Point No. 9.

⁸ Xcel Procedural Paths Compliance Filing, Docket Nos. E002/M-19-666 and E002/M-20-680, August 28, 2020, at 3-5.

not accept stakeholder recommendations, and ultimately, the Commission could delegate approval of the Communications Plan to the Executive Secretary.

The second approach would require Xcel to consult with the Commission's CAO on its Communications Plan that reflect the Department's content-related recommendations below, while following the remainder of the first approach's process, including a 30-day Notice of Comment period to provide stakeholders with an opportunity to provide input and feedback

The third, final, and recommended approach would be to require Xcel to consult with the Commission's CAO on the content of its Communications Plan, delegate approval of the Communications Plan to the Executive Secretary, and then require Xcel to submit its final Communications Plan in a compliance filing.

The Department is open to providing stakeholders with a forum to review Xcel's Communications Plan, but is aware of the concerns regarding a delay to the implementation of Xcel's AMI plans. The first option provides the most opportunity, a narrower opportunity in the second, and no opportunity in the third. While the third option does not provide an opportunity for stakeholder review, the Department notes that the narrow topic of Xcel's Communications Plan may not lend itself well to a larger stakeholder process: the topic would preclude discussion of the merits of Xcel's plans, and instead is limited to what is being communicated to Xcel's customers about Xcel's plans for AMI, and not the plans themselves. Still, some stakeholder input can help ensure that Xcel communicates aspects of its plan that help educate customers in whether to opt-out of its AMI-DI meters.

Accordingly, the Department recommends the third option, but is not opposed to a broader stakeholder process. The Department defers to the Commission regarding its preference for how much, if any, outreach Xcel should be required to conduct for its Communications Plan.

The Department recommends that the Commission require Xcel to include in its customer engagement and education plan the following information for its customers:

- **Scope of AMI-DI, including projected Day 1 uses and future capabilities (e.g. Field Area Network, Home Area Network, Green Button Connect My Data)**
 - **Xcel customer data access, frequency, access by utility**
 - **Customer Energy Usage Data access and rights**
 - **Information on Customer Data Disaggregation**
- (Department Recommendation 1)**

The Department recommends that the Commission require Xcel to consult with the Commission's Consumer Affairs Office on its customer engagement and education plan, subject to the Department's content requirement recommendation. (Department Recommendation 2)

The Department recommends that the Commission delegate approval of Xcel's customer engagement and education plan to the Executive Secretary after consultation with the Commission's

Consumer Affairs Office, and require Xcel to issue its customer engagement and education plan and bill inserts in a compliance filing in this proceeding and other, related proceedings (e.g., Docket Nos. E002/M-19-666 and E002/M-20-680). (Department Recommendation 3)

C. VARIANCE TO MINN. RULE 7820.3500

In order to implement the new interval billing, Xcel requested a variance from Minnesota Rule 7820.3500, subp. A, which requires the Company to print the meters' present and last preceding meter readings on customer bills rendered for electric service.

The Company's request for a variance and subsequently, the Department's analysis of the variance request is governed by Minn. R. 7829.3200. Specifically, Minn. R. 7829.3200 states:

Subp. 1. The commission shall grant a variance to its rules when it determines that the following requirements are met:

- A. Enforcement of the rule would impose an excessive burden upon the applicant or others affected by the rule;
- B. Granting the variance would not adversely affect the public interest; and
- C. Granting the variance would not conflict with standards imposed by law.

As explained in the Petition, the Company's AMI-DI meters are capable of interval billing, and as such, no longer rely on a subtractive billing method, therefore obviating the need to provide customers with their present and last preceding meter readings.⁹ Therefore, the Company requested a variance from Minn. R. 7820.3500, subp. A.

The Company argued that enforcement of Minn. R. 7820.3500, subp. A would impose an excessive burden upon itself and its customers, stating that creating customer confusion and possibly lead to greater number of customer questions, higher levels of customer complaints, and lower customer satisfaction.¹⁰ The Company also argued that changing the billing basis to intervals will provide the necessary flexibility and capabilities necessary to design, offer, and implement advanced rate designs in a cost-effective and expeditious manner. Last, the Company argued that if the Company were required to provide any time the Company implemented new time-of-use or advanced rates or changed existing advanced rates, the Company would need to reprogram each individual meter for customers electing, or already on, those rates. The Department reviewed the Company's arguments and agrees: enforcement of Minn. R. 7820.3500, subp. A would impose an excessive burden upon the Company and its customers.

⁹ Petition, at 5-7.

¹⁰ Petition, at 9.

The Company argued that granting the variance does not adversely affect the public interest, as the information required by Minn. R. 7820.3500, subp. A will not be relevant in the calculation of its customer's electric bill, and the use of interval usage data is actually in the public interest because a customers will be able to better understand and manage their usage.¹¹ The Company also argued that the change to the use of interval data for customer bills enables the Company to offer expanded opportunities to develop and cost-effectively implement advanced rates, which is also in the public interest.

The Department agrees with the Company's arguments, however, with one caveat: the frequency of interval reading should be displayed on customer bills. The Department is concerned that the proposed customer interval bill lacks any information regarding the frequency of interval reading. Figure 1 of the Company's Petition shows the proposed Meter Reading Information. The Company stated that it is programming its system to base customer bills on usage "intervals" of 15 minutes.¹² The Department asserts that the Company should be required to indicate this frequency of interval reading in the "Usage Type" box, and that doing so is in the public interest. The Department concludes that that the Company's request for a variance from Minn. R. 7820.3500, subp. A would not adversely affect the public interest so long as the Company provides the customer with information regarding the frequency of interval reading on which the customer's interval bill is based.

Last, the Department is not aware that granting the rule variance would conflict with standards imposed by law.

The Department recommends that the Commission grant the Company's variance request conditioned upon the provision of information on customer's interval bills regarding the frequency of interval reading on which the customer's interval bill is based. (Department Recommendation 4)

D. PROPOSED TARIFF SHEETS

The following is the Department's analysis of Xcel's proposed tariff sheets.

1. Section No. 5, Original Sheet No. 148 – Manual Meter Reading Service Rider (AMI Opt-out Option)

In Reply Comments, the Company indicated that it had inadvertently added 'ing' after 'Meter' in the title of the new tariff, the "Manual Meter Reading Service Rider."¹³ The Department notes that the Company corrected this mistake and updated its proposed tariff sheets appropriately.

¹¹ Petition, at 9.

¹² Petition, at 6.

¹³ Xcel Reply Comments, at 10.

The Department has reviewed the proposed Manual Meter Reading Service Rider tariff sheet, Section No. 5, Original Sheet No. 148 and concludes that the language is reasonable.

2. Section 8 – Customer Billing Forms and Notices

The Department notes that the Company proposed to alter its “Meter Reading Information” box found on Sheet Nos. 8-2.4, 8-3.4, and 8-4.4. The current version of that tariff has two readings that illustrate the subtractive method of calculating a customer’s bill, showing the current reading and the previous reading, and then indicating a usage amount that is the difference of the two.¹⁴ The proposed version of the same box has only one reading that indicates the actual usage amount, which reflects that the interval billing is indeed an actual reading of the customer’s AMI-DI meter.

The Department requested further information in Xcel’s Reply Comments regarding Xcel’s transition to interval billing, including whether a customer would be informed of how often their meter is being read by Xcel, and if so, how, when and how often would the customer be informed of any reading interval change. Xcel stated that the Department’s interest in this information goes beyond this petition, and concluded that “such a matter is part of its mass deployment of meters—not something unique-to or otherwise relevant to our narrow request for how the interval usage used to calculate customer bills will be presented on the bill.”¹⁵

The Department disagrees that this information is beyond the scope of this Petition. Such information is germane to a customer’s consideration of whether to opt-out of Xcel’s AMI-DI meters, and presenting that information on a customer’s interval bill will mean that a customer will know how frequently their energy usage is being accessed in order for the Company to calculate the customer’s interval bill, even if the Company’s plans change over time and advanced rate designs are adopted. Department Recommendation 4 above will implement this modification to the proposed interval bill.

The Department has reviewed Xcel’s proposed tariff sheets under Section No. 8, Customer Billing Forms and Notices, and concludes that the proposed revisions are reasonable. The Department has no other concerns at this time.

The Department recommends approval of the Company’s proposed tariff sheets, subject to the Department’s recommended modification to the proposed interval bill. (Department Recommendation 5)

E. OPTIONAL MANUAL METER READING SERVICE COST ESTIMATE REVIEW

As noted in the Petition, the costs associated with the Company’s Manual Meter Read Meters (MMR) are estimates and will be reevaluated by Xcel once the final MMR meters are selected, which was anticipated to be in September 2020 as Xcel noted in response to Department Information Request No.

¹⁴ Xcel Minnesota Electric Rate Book – MPUC No. 2, Section 8, Sheet Nos. 2.1, 3.1, and 4.1. Accessed at: https://www.xcelenergy.com/staticfiles/xcel-responsive/Company/Rates%20&%20Regulations/Me_Section_8.pdf.

¹⁵ Xcel Reply Comments, at 3.

6. In Reply Comments, Xcel reiterated its proposal to submit a compliance filing with updated pricing and Tariff Sheets for its MMR Tariff that reflects the final cost differential of the non-standard meter.¹⁶ If the petition is approved, the Department supports a compliance filing in the instant proceeding, as well as information filed in any future cost recovery request.

The Department recommends that the Commission require Xcel to file within 30 days of the Commission's decision on this tariff an update on the selected Manual Meter Read Meter and updated cost estimates and Tariff Sheets in the instant proceeding and in any future cost recovery request that reflects the final cost differential of the non-standard meter. (Department Recommendation 6)

Xcel also proposed to file a longer-term compliance filing that would serve as a formal review of the pricing for this optional service – approximately one year after AMI is fully deployed.¹⁷

The Department recommends that the Commission require Xcel to file within one year of full AMI implementation a formal review of the pricing for the Manual Meter Reading Service and include a recommendation as to whether Xcel believes any of the cost components should change. (Department Recommendation 7)

F. EFFECT OF CHANGE ON XCEL ENERGY REVENUE

The Department's September 9, 2020 Comments contained two recommendations regarding estimated and actual revenue information in Xcel's forthcoming cost-recovery requests for AMI and FAN (now expected November 1, 2021), and information on costs and savings resulting from opt-out customers:

The Department recommends that the Commission require Xcel to file estimated and actual revenue information (information included in Information Request Nos. 6, 7, 9, 10, 13, and 14) in any upcoming cost-recovery requests for AMI and FAN. (Department Recommendation 8)

[T]he Department recommends that Xcel also include information on costs and savings resulting from opt-out customers in the compliance filing Xcel proposed in this petition, including information on the actual costs for the MMR meters, operational costs, and all other incremental changes to revenue associated with AMI opt-out customers. (Department Recommendation 9)

The Department maintains these recommendations.

¹⁶ Xcel Reply Comments, at 8.

¹⁷ Xcel Reply Comments, at 8.

In Xcel's Reply Comments, it indicated that it was "happy to include additional information in this compliance filing" but noted that the Company was not expecting any savings from this service because it anticipated that it would be a cost-causer.¹⁸

While the Company may not expect any cost savings from the proposed MMR tariff, the Company's overall meter and meter reading costs should decrease as a result of its AMI implementation. If Xcel files its AMI proposal in its forthcoming TCR rider as expected, Xcel should explicitly delineate costs and exclude its AMI proposal cost recovery request from its next rate case to avoid any potential for double recovery.

The Department recommends that the Commission require Xcel to exclude its AMI cost recovery from its next rate case if the Company requests cost recovery through its next Transmission Cost Recovery Rider Petition. (Department Recommendation 10)

III. CONCLUSION AND RECOMMENDATIONS

The Department appreciates the Company's and the Commission's patience for the Department's review of Xcel's reply comments, and the opportunity to provide these supplemental comments. The Department offers the following recommendations:

- **The Department recommends that the Commission require Xcel to include in its customer engagement and education plan the following information for its customers:**
 - **Scope of AMI-DI, including projected Day 1 uses and future capabilities (e.g. Field Area Network, Home Area Network, Green Button Connect My Data)**
 - **Xcel customer data access, frequency, access by utility**
 - **Customer Energy Usage Data access and rights**
 - **Information on Customer Data Disaggregation**
- (Department Recommendation 1)**

¹⁸ Xcel Reply Comments, at 8.

- The Department recommends that the Commission require Xcel to consult with the Commission's Consumer Affairs Office on its customer engagement and education plan, subject to the Department's content requirement recommendation. (Department Recommendation 2)
- The Department recommends that the Commission delegate approval of Xcel's customer engagement and education plan to the Executive Secretary after consultation with the Commission's Consumer Affairs Office, and require Xcel to issue its customer engagement and education plan and bill inserts in a compliance filing in this proceeding and other, related proceedings (e.g., Docket Nos. E002/M-19-666 and E002/M-20-680). (Department Recommendation 3)
- The Department recommends that the Commission grant the Company's variance request conditioned upon the provision of information on customer's interval bills regarding the frequency of interval reading on which the customer's interval bill is based. (Department Recommendation 4)
- The Department recommends approval of the Company's proposed tariff sheets, subject to the recommended modification to the proposed interval bill. (Department Recommendation 5)
- The Department recommends that the Commission require Xcel to file within 30 days of the Commission's decision on this tariff an update on the selected Manual Meter Read Meter and updated cost estimates and Tariff Sheets in the instant proceeding and in any future cost recovery request that reflects the final cost differential of the non-standard meter. (Department Recommendation 6)
- The Department recommends that the Commission require Xcel to file within one year of full AMI implementation a formal review of the pricing for the Manual Meter Reading Service and include a recommendation as to whether Xcel believes any of the cost components should change. (Department Recommendation 7)
- The Department recommends that the Commission require Xcel to file estimated and actual revenue information (information included in Information Request Nos. 6, 7, 9, 10, 13, and 14) in any upcoming cost-recovery requests for AMI and FAN. (Department Recommendation 8)
- The Department recommends that Xcel also include information on costs and savings resulting from opt-out customers in the compliance filing Xcel proposed in this petition, including information on the actual costs for the MMR meters, operational costs, and all other incremental changes to revenue associated with AMI opt-out customers. (Department Recommendation 9)

- **The Department recommends that the Commission require Xcel to exclude its AMI cost recovery from its next rate case if the Company requests cost recovery through its next Transmission Cost Recovery Rider Petition. (Department Recommendation 10)**

/ja

CERTIFICATE OF SERVICE

I, Linda Chavez, hereby certify that I have this day served copies of the following document on the attached list of persons by electronic filing, 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 – SUPPLEMENTAL COMMENTS

Docket Nos. **E002/M-20-592**

Dated this **28th** day of **May, 2021**.

/s/Linda Chavez

[illegible]

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Derek	Bertsch	derek.bertsch@mrenergy.com	Missouri River Energy Services	3724 West Avera Drive PO Box 88920 Sioux Falls, SD 57109-8920	Electronic Service	No	OFF_SL_20-592_M-20-592
William	Black	bblack@mmua.org	MMUA	Suite 200 3131 Fernbrook Lane North Plymouth, MN 55447	Electronic Service	No	OFF_SL_20-592_M-20-592
Kenneth	Bradley	kbradley1965@gmail.com		2837 Emerson Ave S Apt CW112 Minneapolis, MN 55408	Electronic Service	No	OFF_SL_20-592_M-20-592
Elizabeth	Brama	ebrama@taftlaw.com	Taft Stettinius & Hollister LLP	2200 IDS Center 80 South 8th Street Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-592_M-20-592
Jon	Brekke	jbrekke@grenergy.com	Great River Energy	12300 Elm Creek Boulevard Maple Grove, MN 553694718	Electronic Service	No	OFF_SL_20-592_M-20-592
Sydney R.	Briggs	sbriggs@swce.coop	Steele-Waseca Cooperative Electric	2411 W. Bridge St PO Box 485 Owatonna, MN 55060-0485	Electronic Service	No	OFF_SL_20-592_M-20-592
Mark B.	Bring	mbring@otpc.com	Otter Tail Power Company	215 South Cascade Street PO Box 496 Fergus Falls, MN 565380496	Electronic Service	No	OFF_SL_20-592_M-20-592
Christina	Brusven	cbrusven@fredlaw.com	Fredrikson Byron	200 S 6th St Ste 4000 Minneapolis, MN 554021425	Electronic Service	No	OFF_SL_20-592_M-20-592
Michael J.	Bull	mbull@mncee.org	Center for Energy and Environment	212 Third Ave N Ste 560 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_20-592_M-20-592

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Jessica	Burdette	jessica.burdette@state.mn.us	Department of Commerce	85 7th Place East Suite 500 St. Paul, MN 55101	Electronic Service	No	OFF_SL_20-592_M-20-592
Jason	Burwen	j.burwen@energystorage.org	Energy Storage Association	1155 15th St NW, Ste 500 Washington, DC 20005	Electronic Service	No	OFF_SL_20-592_M-20-592
LORI	CLOBES	lclobes@mienergy.coop	MiEnergy Cooperative	31110 COOPERATIVE WAY PO BOX 626 RUSHFORD, MN 55971	Electronic Service	No	OFF_SL_20-592_M-20-592
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_20-592_M-20-592
Douglas M.	Carnival	dmc@mcgrannshea.com	McGrann Shea Carnival Straughn & Lamb	N/A	Electronic Service	No	OFF_SL_20-592_M-20-592
Ray	Choquette	rchoquette@agp.com	Ag Processing Inc.	12700 West Dodge Road PO Box 2047 Omaha, NE 68103-2047	Electronic Service	No	OFF_SL_20-592_M-20-592
John	Coffman	john@johncoffman.net	AARP	871 Tuxedo Blvd. St. Louis, MO 63119-2044	Electronic Service	No	OFF_SL_20-592_M-20-592
Kenneth A.	Colburn	kcolburn@symbioticstrategies.com	Symbiotic Strategies, LLC	26 Winton Road Meredith, NH 32535413	Electronic Service	No	OFF_SL_20-592_M-20-592
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_20-592_M-20-592
Riley	Conlin	riley.conlin@stoel.com	Stoel Rives LLP	33 S. 6th Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-592_M-20-592

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Brooke	Cooper	bcooper@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022191	Electronic Service	No	OFF_SL_20-592_M-20-592
George	Crocker	gwillc@nawo.org	North American Water Office	PO Box 174 Lake Elmo, MN 55042	Electronic Service	No	OFF_SL_20-592_M-20-592
David	Dahlberg	davedahlberg@nweco.com	Northwestern Wisconsin Electric Company	P.O. Box 9 104 South Pine Street Grantsburg, WI 548400009	Electronic Service	No	OFF_SL_20-592_M-20-592
James	Denniston	james.r.denniston@xcenergy.com	Xcel Energy Services, Inc.	414 Nicollet Mall, 401-8 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_20-592_M-20-592
Curt	Dieren	curt.dieren@dgr.com	L&O Power Cooperative	1302 S Union St Rock Rapids, IA 51246	Electronic Service	No	OFF_SL_20-592_M-20-592
Carlton	Doyle Fontaine	carlton.doyle.fontaine@senate.mn	MN Senate	75 Rev Dr Martin Luther King Jr Blvd Room G-17 St Paul, MN 55155	Electronic Service	No	OFF_SL_20-592_M-20-592
Brian	Draxten	bhdraxten@otpc.com	Otter Tail Power Company	P.O. Box 496 215 South Cascade Street Fergus Falls, MN 565380498	Electronic Service	No	OFF_SL_20-592_M-20-592
Kristen	Eide Tollefson	healingsystems69@gmail.com	R-CURE	28477 N Lake Ave Frontenac, MN 55026-1044	Electronic Service	No	OFF_SL_20-592_M-20-592
Rebecca	Eilers	rebecca.d.eilers@xcenergy.com	Xcel Energy	414 Nicollet Mall - 401 7th Floor Minneapolis, MN 55401	Electronic Service	No	OFF_SL_20-592_M-20-592

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Bob	Eleff	bob.eleff@house.mn	Regulated Industries Cmte	100 Rev Dr Martin Luther King Jr Blvd Room 600 St. Paul, MN 55155	Electronic Service	No	OFF_SL_20-592_M-20-592
Betsy	Engelking	betsy@geronimoenergy.com	Geronimo Energy, LLC	8400 Normandale Lake Blvd Suite 1200 Bloomington, MN 55437	Electronic Service	No	OFF_SL_20-592_M-20-592
Oncu	Er	oncu.er@avantenergy.com	Avant Energy, Agent for MMPA	220 S. Sixth St. Ste. 1300 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-592_M-20-592
Jim	Erickson	jim.g.erickson@xcelenergy.com	Xcel Energy	414 Nicollet mall 7th Flr Minneapolis, MN 55401	Electronic Service	No	OFF_SL_20-592_M-20-592
James C.	Erickson	jericksonkbc@gmail.com	Kelly Bay Consulting	17 Quechee St Superior, WI 54880-4421	Electronic Service	No	OFF_SL_20-592_M-20-592
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_20-592_M-20-592
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_20-592_M-20-592
Nathan	Franzen	nathan@geronimoenergy.com	Geronimo Energy, LLC	8400 Normandale Lake Blvd Suite 1200 Bloomington, MN 55437	Electronic Service	No	OFF_SL_20-592_M-20-592
Hal	Galvin	halgalvin@comcast.net	Provectus Energy Development llc	1936 Kenwood Parkway Minneapolis, MN 55405	Electronic Service	No	OFF_SL_20-592_M-20-592

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Edward	Garvey	garveyed@aol.com	Residence	32 Lawton St Saint Paul, MN 55102	Electronic Service	No	OFF_SL_20-592_M-20-592
Edward	Garvey	edward.garvey@AESLconsulting.com	AESL Consulting	32 Lawton St Saint Paul, MN 55102-2617	Electronic Service	No	OFF_SL_20-592_M-20-592
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_20-592_M-20-592
Allen	Gleckner	gleckner@fresh-energy.org	Fresh Energy	408 St. Peter Street Ste 220 Saint Paul, Minnesota 55102	Electronic Service	No	OFF_SL_20-592_M-20-592
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_20-592_M-20-592
Timothy	Gulden	timothy.gulden@yahoo.com	Winona Renewable Energy, LLC	1449 Ridgewood Dr Winona, MN 55987	Electronic Service	No	OFF_SL_20-592_M-20-592
Tony	Hainault	anthony.hainault@co.hennepin.mn.us	Hennepin County DES	701 4th Ave S Ste 700 Minneapolis, MN 55415-1842	Electronic Service	No	OFF_SL_20-592_M-20-592
Matthew B	Harris	matt.b.harris@xcelenergy.com	XCEL ENERGY	401 Nicollet Mall FL 8 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_20-592_M-20-592
Kim	Havey	kim.havey@minneapolismn.gov	City of Minneapolis	350 South 5th Street, Suite 315M Minneapolis, MN 55415	Electronic Service	No	OFF_SL_20-592_M-20-592
Todd	Headlee	theadlee@dvigridsolutions.com	Dominion Voltage, Inc.	701 E. Cary Street Richmond, VA 23219	Electronic Service	No	OFF_SL_20-592_M-20-592

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Amber	Hedlund	amber.r.hedlund@xcelenergy.com	Northern States Power Company dba Xcel Energy-Elec	414 Nicollet Mall, 401-7 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_20-592_M-20-592
Adam	Heinen	aheinen@dakotaelectric.com	Dakota Electric Association	4300 220th St W Farmington, MN 55024	Electronic Service	No	OFF_SL_20-592_M-20-592
Jared	Hendricks	jared.hendricks@owatonnautilities.com	Owatonna Public Utilities	PO Box 800 208 S Walnut Ave Owatonna, MN 55060-2940	Electronic Service	No	OFF_SL_20-592_M-20-592
Annete	Henkel	mui@mutilityinvestors.org	Minnesota Utility Investors	413 Wacouta Street #230 St. Paul, MN 55101	Electronic Service	No	OFF_SL_20-592_M-20-592
Shane	Henriksen	shane.henriksen@enbridge.com	Enbridge Energy Company, Inc.	1409 Hammond Ave FL 2 Superior, WI 54880	Electronic Service	No	OFF_SL_20-592_M-20-592
Lynn	Hinkle	lynnh@ips-solar.com	IPS Solar	2670 Patton Rd Roseville, MN 55113	Electronic Service	No	OFF_SL_20-592_M-20-592
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_20-592_M-20-592
Jan	Hubbard	jan.hubbard@comcast.net		7730 Mississippi Lane Brooklyn Park, MN 55444	Electronic Service	No	OFF_SL_20-592_M-20-592
Geoffrey	Inge	ginge@regintl.com	Regulatory Intelligence LLC	PO Box 270636 Superior, CO 80027-9998	Electronic Service	No	OFF_SL_20-592_M-20-592
Casey	Jacobson	cjacobson@bepc.com	Basin Electric Power Cooperative	1717 East Interstate Avenue Bismarck, ND 58501	Electronic Service	No	OFF_SL_20-592_M-20-592

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Ralph	Jacobson	ralphj@ips-solar.com		2126 Roblyn Avenue Saint Paul, Minnesota 55104	Electronic Service	No	OFF_SL_20-592_M-20-592
John S.	Jaffray	jjaffray@jirpower.com	JJR Power	350 Highway 7 Suite 236 Excelsior, MN 55331	Electronic Service	No	OFF_SL_20-592_M-20-592
Alan	Jenkins	aj@jenkinsatlaw.com	Jenkins at Law	2950 Yellowtail Ave. Marathon, FL 33050	Electronic Service	No	OFF_SL_20-592_M-20-592
Richard	Johnson	Rick.Johnson@lawmoss.com	Moss & Barnett	150 S. 5th Street Suite 1200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-592_M-20-592
Sarah	Johnson Phillips	sarah.phillips@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-592_M-20-592
Nate	Jones	njones@hcpd.com	Heartland Consumers Power	PO Box 248 Madison, SD 57042	Electronic Service	No	OFF_SL_20-592_M-20-592
Michael	Kampmeyer	mkampmeyer@a-e-group.com	AEG Group, LLC	260 Salem Church Road Sunfish Lake, Minnesota 55118	Electronic Service	No	OFF_SL_20-592_M-20-592
Mark J.	Kaufman	mkaufman@ibewlocal949.org	IBEW Local Union 949	12908 Nicollet Avenue South Burnsville, MN 55337	Electronic Service	No	OFF_SL_20-592_M-20-592
Ted	Kjos	tkjos@mienergy.coop	MiEnergy Cooperative	31110 Cooperative Way PO Box 626 Rushford, MN 55971	Electronic Service	No	OFF_SL_20-592_M-20-592

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Brad	Klein	bklein@elpc.org	Environmental Law & Policy Center	35 E. Wacker Drive, Suite 1600 Suite 1600 Chicago, IL 60601	Electronic Service	No	OFF_SL_20-592_M-20-592
Thomas	Koehler	TGK@IBEW160.org	Local Union #160, IBEW	2909 Anthony Ln St Anthony Village, MN 55418-3238	Electronic Service	No	OFF_SL_20-592_M-20-592
Chris	Kopel	chrisk@CMPASgroup.org	Central Minnesota Municipal Power Agency	459 S Grove St Blue Earth, MN 56013-2629	Electronic Service	No	OFF_SL_20-592_M-20-592
Brian	Krambeer	bkrambeer@mienergy.coop	MiEnergy Cooperative	PO Box 626 31110 Cooperative Way Rushford, MN 55971	Electronic Service	No	OFF_SL_20-592_M-20-592
Michael	Krause	michaelkrause61@yahoo.com	Kandiyo Consulting, LLC	433 S 7th Street Suite 2025 Minneapolis, Minnesota 55415	Electronic Service	No	OFF_SL_20-592_M-20-592
Michael	Krikava	mkrikava@taftlaw.com	Taft Stettinius & Hollister LLP	2200 IDS Center 80 S 8th St Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-592_M-20-592
Matthew	Lacey	Mlacey@grenergy.com	Great River Energy	12300 Elm Creek Boulevard Maple Grove, MN 553694718	Electronic Service	No	OFF_SL_20-592_M-20-592
Carmel	Laney	carmel.laney@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-592_M-20-592
James D.	Larson	james.larson@avantenergy.com	Avant Energy Services	220 S 6th St Ste 1300 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-592_M-20-592

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Peder	Larson	plarson@larkinhoffman.com	Larkin Hoffman Daly & Lindgren, Ltd.	8300 Norman Center Drive Suite 1000 Bloomington, MN 55437	Electronic Service	No	OFF_SL_20-592_M-20-592
Dean	Leischow	dean@sunrisenrg.com	Sunrise Energy Ventures	315 Manitoba Ave Wayzata, MN 55391	Electronic Service	No	OFF_SL_20-592_M-20-592
Annie	Levenson Falk	annielf@cubminnesota.org	Citizens Utility Board of Minnesota	332 Minnesota Street, Suite W1360 St. Paul, MN 55101	Electronic Service	No	OFF_SL_20-592_M-20-592
Ryan	Long	ryan.j.long@xcelenergy.com	Xcel Energy	414 Nicollet Mall 401 8th Floor Minneapolis, MN 55401	Electronic Service	No	OFF_SL_20-592_M-20-592
Susan	Ludwig	sludwig@mnpower.com	Minnesota Power	30 West Superior Street Duluth, MN 55802	Electronic Service	No	OFF_SL_20-592_M-20-592
Kavita	Maini	kmaini@wi.rr.com	KM Energy Consulting, LLC	961 N Lost Woods Rd Oconomowoc, WI 53066	Electronic Service	No	OFF_SL_20-592_M-20-592
Pam	Marshall	pam@energycents.org	Energy CENTS Coalition	823 7th St E St. Paul, MN 55106	Electronic Service	No	OFF_SL_20-592_M-20-592
Mary	Martinka	mary.a.martinka@xcelenergy.com	Xcel Energy Inc	414 Nicollet Mall 7th Floor Minneapolis, MN 55401	Electronic Service	No	OFF_SL_20-592_M-20-592
Samuel	Mason	smason@beltramelectric.com	Beltrami Electric Cooperative, Inc.	4111 Technology Dr. NW PO Box 488 Bemidji, MN 56619-0488	Electronic Service	No	OFF_SL_20-592_M-20-592
Gregg	Mast	gmast@cleanenergyeconomy.mn.org	Clean Energy Economy Minnesota	4237 24th Avenue S Minneapolis, MN 55406	Electronic Service	No	OFF_SL_20-592_M-20-592

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Dave	McNary	David.McNary@hennepin.us	Hennepin County DES	701 Fourth Ave S Ste 700 Minneapolis, MN 55415-1842	Electronic Service	No	OFF_SL_20-592_M-20-592
Thomas	Melone	Thomas.Melone@AllcoUS.com	Minnesota Go Solar LLC	222 South 9th Street Suite 1600 Minneapolis, Minnesota 55120	Electronic Service	No	OFF_SL_20-592_M-20-592
Brian	Meloy	brian.meloy@stinson.com	STINSON LLP	50 S 6th St Ste 2600 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-592_M-20-592
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_20-592_M-20-592
Stacy	Miller	stacy.miller@minneapolismn.gov	City of Minneapolis	350 S. 5th Street Room M 301 Minneapolis, MN 55415	Electronic Service	No	OFF_SL_20-592_M-20-592
David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022093	Electronic Service	No	OFF_SL_20-592_M-20-592
Dalene	Monsebroten	dalene.monsebroten@nmpagency.com	Northern Municipal Power Agency	123 2nd St W Thief River Falls, MN 56701	Electronic Service	No	OFF_SL_20-592_M-20-592
Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP	33 South Sixth St Ste 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-592_M-20-592
Ben	Nelson	benn@cmpasgroup.org	CMPMPA	459 South Grove Street Blue Earth, MN 56013	Electronic Service	No	OFF_SL_20-592_M-20-592
Carl	Nelson	cnelson@mncee.org	Center for Energy and Environment	212 3rd Ave N Ste 560 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_20-592_M-20-592

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Dale	Niezwaag	dniezwaag@bepc.com	Basin Electric Power Cooperative	1717 East Interstate Avenue Bismarck, ND 58503	Electronic Service	No	OFF_SL_20-592_M-20-592
David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency	220 South Sixth Street Suite 1300 Minneapolis, Minnesota 55402	Electronic Service	No	OFF_SL_20-592_M-20-592
Sephra	Ninow	sephra.ninow@energycenter.org	Center for Sustainable Energy	426 17th Street, Suite 700 Oakland, CA 94612	Electronic Service	No	OFF_SL_20-592_M-20-592
Rolf	Nordstrom	rnordstrom@gpisd.net	Great Plains Institute	2801 21ST AVE S STE 220 Minneapolis, MN 55407-1229	Electronic Service	No	OFF_SL_20-592_M-20-592
Samantha	Norris	samanthanorris@alliantenergy.com	Interstate Power and Light Company	200 1st Street SE PO Box 351 Cedar Rapids, IA 524060351	Electronic Service	No	OFF_SL_20-592_M-20-592
David	O'Brien	david.obrien@navigant.com	Navigant Consulting	77 South Bedford St Ste 400 Burlington, MA 01803	Electronic Service	No	OFF_SL_20-592_M-20-592
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_20-592_M-20-592
Russell	Olson	rolson@hcpd.com	Heartland Consumers Power District	PO Box 248 Madison, SD 570420248	Electronic Service	No	OFF_SL_20-592_M-20-592
Carol A.	Overland	overland@legalelectric.org	Legalelectric - Overland Law Office	1110 West Avenue Red Wing, MN 55066	Electronic Service	No	OFF_SL_20-592_M-20-592

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Dan	Patry	dpatry@sunedison.com	SunEdison	600 Clipper Drive Belmont, CA 94002	Electronic Service	No	OFF_SL_20-592_M-20-592
Jeffrey C	Paulson	jeff.jcplaw@comcast.net	Paulson Law Office, Ltd.	4445 W 77th Street Suite 224 Edina, MN 55435	Electronic Service	No	OFF_SL_20-592_M-20-592
Joyce	Peppin	joyce@mrea.org	Minnesota Rural Electric Association	11640 73rd Ave N Maple Grove, MN 55369	Electronic Service	No	OFF_SL_20-592_M-20-592
Mary Beth	Peranteau	mperanteau@wheelerlaw.com	Wheeler Van Sickle & Anderson SC	44 E. Mifflin Street, 10th Floor Madison, WI 53703	Electronic Service	No	OFF_SL_20-592_M-20-592
Jennifer	Peterson	jjpeterson@mnpower.com	Minnesota Power	30 West Superior Street Duluth, MN 55802	Electronic Service	No	OFF_SL_20-592_M-20-592
Hannah	Polikov	hpolikov@aee.net	Advanced Energy Economy Institute	1000 Vermont Ave, Third Floor Washington, DC 20005	Electronic Service	No	OFF_SL_20-592_M-20-592
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_20-592_M-20-592
Gregory	Randa	granda@lakecountrypower.com	Lake Country Power	26039 Bear Ridge Drive Cohasset, MN 55721	Electronic Service	No	OFF_SL_20-592_M-20-592
Mark	Rathbun	mrathbun@greenergy.com	Great River Energy	12300 Elm Creek Blvd Maple Grove, MN 55369	Electronic Service	No	OFF_SL_20-592_M-20-592

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Michael	Reinertson	michael.reinertson@avanteenergy.com	Avant Energy	220 S. Sixth St. Ste 1300 Minneapolis, Minnesota 55402	Electronic Service	No	OFF_SL_20-592_M-20-592
John C.	Reinhardt	N/A	Laura A. Reinhardt	3552 26th Ave S Minneapolis, MN 55406	Paper Service	No	OFF_SL_20-592_M-20-592
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_20-592_M-20-592
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_20-592_M-20-592
Isabel	Ricker	ricker@fresh-energy.org	Fresh Energy	408 Saint Peter Street Suite 220 Saint Paul, MN 55102	Electronic Service	No	OFF_SL_20-592_M-20-592
Amanda	Rome	amanda.rome@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 5 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_20-592_M-20-592
Robert K.	Sahr	bsahr@eastriver.coop	East River Electric Power Cooperative	P.O. Box 227 Madison, SD 57042	Electronic Service	No	OFF_SL_20-592_M-20-592
Richard	Savelkoul	rsavelkoul@martinsquires.com	Martin & Squires, P.A.	332 Minnesota Street Ste W2750 St. Paul, MN 55101	Electronic Service	No	OFF_SL_20-592_M-20-592
Thomas	Scharff	thomas.scharff@versoco.com	Verso Corp	600 High Street Wisconsin Rapids, WI 54495	Electronic Service	No	OFF_SL_20-592_M-20-592

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Larry L.	Schedin	Larry@LLSResources.com	LLS Resources, LLC	332 Minnesota St, Ste W1390 St. Paul, MN 55101	Electronic Service	No	OFF_SL_20-592_M-20-592
Christopher	Schoenherr	cp.schoenherr@smmpa.org	SMMPA	500 First Ave SW Rochester, MN 55902-3303	Electronic Service	No	OFF_SL_20-592_M-20-592
Kay	Schraeder	kschraeder@minnkota.com	Minnkota Power	5301 32nd Ave S Grand Forks, ND 58201	Electronic Service	No	OFF_SL_20-592_M-20-592
Dean	Sedgwick	Sedgwick@Itascapower.com	Itasca Power Company	PO Box 455 Spring Lake, MN 56680	Electronic Service	No	OFF_SL_20-592_M-20-592
Maria	Seidler	maria.seidler@dom.com	Dominion Energy Technology	120 Tredegar Street Richmond, Virginia 23219	Electronic Service	No	OFF_SL_20-592_M-20-592
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_20-592_M-20-592
David	Shaffer	shaff081@gmail.com	Minnesota Solar Energy Industries Project	1005 Fairmount Ave Saint Paul, MN 55105	Electronic Service	No	OFF_SL_20-592_M-20-592
Patricia F	Sharkey	psharkey@environmentallawcounsel.com	Midwest Cogeneration Association.	180 N LaSalle St Ste 3700 Chicago, IL 60601	Electronic Service	No	OFF_SL_20-592_M-20-592
Bria	Shea	bria.e.shea@xcelenergy.com	Xcel Energy	414 Nicollet Mall Minneapolis, MN 55401	Electronic Service	No	OFF_SL_20-592_M-20-592
Doug	Shoemaker	dougs@charter.net	Minnesota Renewable Energy	2928 5th Ave S Minneapolis, MN 55408	Electronic Service	No	OFF_SL_20-592_M-20-592

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Anne	Smart	anne.smart@chargepoint.com	ChargePoint, Inc.	254 E Hacienda Ave Campbell, CA 95008	Electronic Service	No	OFF_SL_20-592_M-20-592
Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.	76 W Kellogg Blvd St. Paul, MN 55102	Electronic Service	No	OFF_SL_20-592_M-20-592
Joshua	Smith	joshua.smith@sierraclub.org		85 Second St FL 2 San Francisco, California 94105	Electronic Service	No	OFF_SL_20-592_M-20-592
Trevor	Smith	trevor.smith@avantenergy.com	Avant Energy, Inc.	220 South Sixth Street Suite 1300 Minneapolis, Minnesota 55402	Electronic Service	No	OFF_SL_20-592_M-20-592
Ken	Smith	ken.smith@ever-greenenergy.com	Ever Green Energy	305 Saint Peter St Saint Paul, MN 55102	Electronic Service	No	OFF_SL_20-592_M-20-592
Beth H.	Soholt	bsoholt@windonthewires.org	Wind on the Wires	570 Asbury Street Suite 201 St. Paul, MN 55104	Electronic Service	No	OFF_SL_20-592_M-20-592
Benjamin	Stafford	bstafford@cleanenergyeconymn.org	Clean Energy Economy Minnesota	400 South 4th St Ste 401-202 Minneapolis, MN 55415	Electronic Service	No	OFF_SL_20-592_M-20-592
Sky	Stanfield	stanfield@smwlaw.com	Shute, Mihaly & Weinberger	396 Hayes Street San Francisco, CA 94102	Electronic Service	No	OFF_SL_20-592_M-20-592
Tom	Stanton	tstanton@nrri.org	NRRI	1080 Carmack Road Columbus, OH 43210	Electronic Service	No	OFF_SL_20-592_M-20-592
Byron E.	Starns	byron.starns@stinson.com	STINSON LLP	50 S 6th St Ste 2600 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-592_M-20-592

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
James M	Strommen	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered	150 S 5th St Ste 700 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-592_M-20-592
Eric	Swanson	eswanson@winthrop.com	Winthrop & Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_20-592_M-20-592
Thomas P.	Sweeney III	tom.sweeney@easycleaneergy.com	Clean Energy Collective	P O Box 1828 Boulder, CO 80306-1828	Electronic Service	No	OFF_SL_20-592_M-20-592
Lynnette	Sweet	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	Yes	OFF_SL_20-592_M-20-592
Stuart	Tommerdahl	stommerdahl@otpc.com	Otter Tail Power Company	215 S Cascade St PO Box 496 Fergus Falls, MN 56537	Electronic Service	No	OFF_SL_20-592_M-20-592
Pat	Treseler	pat.jcplaw@comcast.net	Paulson Law Office LTD	4445 W 77th Street Suite 224 Edina, MN 55435	Electronic Service	No	OFF_SL_20-592_M-20-592
Lise	Trudeau	lise.trudeau@state.mn.us	Department of Commerce	85 7th Place East Suite 500 Saint Paul, MN 55101	Electronic Service	No	OFF_SL_20-592_M-20-592
Karen	Turnboom	karen.turnboom@versocom	Verso Corporation	100 Central Avenue Duluth, MN 55807	Electronic Service	No	OFF_SL_20-592_M-20-592
Andrew	Twite	twite@fresh-energy.org	Fresh Energy	408 St. Peter Street, Ste. 220 St. Paul, MN 55102	Electronic Service	No	OFF_SL_20-592_M-20-592

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Thomas	Tynes	jjazynka@energyfreedomcoalition.com	Energy Freedom Coalition of America	101 Constitution Ave NW Ste 525 East Washington, DC 20001	Electronic Service	No	OFF_SL_20-592_M-20-592
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_20-592_M-20-592
Nikhil	Vijaykar	NVijaykar@elpc.org	Enviornental Law & Policy Center	N/A	Electronic Service	No	OFF_SL_20-592_M-20-592
Curt	Volkman	curt@newenergy-advisors.com	Fresh Energy	N/A	Electronic Service	No	OFF_SL_20-592_M-20-592
Roger	Warehime	roger.warehime@owatonnautilities.com	Owatonna Public Utilities	208 South WalnutPO Box 800 Owatonna, MN 55060	Electronic Service	No	OFF_SL_20-592_M-20-592
Jenna	Warmuth	jwarmuth@mnpower.com	Minnesota Power	30 W Superior St Duluth, MN 55802-2093	Electronic Service	No	OFF_SL_20-592_M-20-592
Samantha	Williams	swilliams@nrdc.org	Natural Resources Defense Council	20 N. Wacker Drive Ste 1600 Chicago, IL 60606	Electronic Service	No	OFF_SL_20-592_M-20-592
Joseph	Windler	jwindler@winthrop.com	Winthrop & Weinstine	225 South Sixth Street, Suite 3500 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-592_M-20-592
Robyn	Woeste	robynwoeste@alliantenergy.com	Interstate Power and Light Company	200 First St SE Cedar Rapids, IA 52401	Electronic Service	No	OFF_SL_20-592_M-20-592
Yochi	Zakai	yzakai@smwlaw.com	SHUTE, MIHALY & WEINBERGER LLP	396 Hayes Street San Francisco, CA 94102	Electronic Service	No	OFF_SL_20-592_M-20-592

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Thomas J.	Zaremba	TZaremba@wheelerlaw.com	WHEELER, VAN SICKLE & ANDERSON	44 E. Mifflin Street, 10th Floor Madison, WI 53703	Electronic Service	No	OFF_SL_20-592_M-20-592
Christopher	Zibart	czibart@atcllc.com	American Transmission Company LLC	W234 N2000 Ridgeview Pkwy Court Waukesha, WI 53188-1022	Electronic Service	No	OFF_SL_20-592_M-20-592
Patrick	Zomer	Pat.Zomer@lawmoss.com	Moss & Barnett a Professional Association	150 S. 5th Street, #1200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-592_M-20-592