



414 Nicollet Mall  
Minneapolis, MN 55401

May 12, 2021

—Via Electronic Filing—

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

RE: NOTICE  
NEW NON-REGULATED OFFERINGS  
DOCKET NO. E,G002/21-\_\_\_\_\_

Dear Mr. Seuffert:

Northern States Power Company, doing business as Xcel Energy (NSPM or the Company), submits to the Minnesota Public Utilities Commission the enclosed Notice presenting a summary of a new Energy, Infrastructure and Sustainability program the Company is planning to offer to business customers in the near future.

We have electronically filed this document with the Minnesota Public Utilities Commission, and copies have been served on the parties on the attached service list. Please contact Amber Hedlund at [amber.r.hedlund@xcelenergy.com](mailto:amber.r.hedlund@xcelenergy.com) or 612-337-2268 or me at [amy.a.liberkowski@xcelenergy.com](mailto:amy.a.liberkowski@xcelenergy.com) or 612-330-6613 if you have any questions regarding this filing.

Sincerely,

/s/

AMY LIBERKOWSKI  
DIRECTOR, REGULATORY PRICING AND ANALYSIS

Enclosure  
c: Service List

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 THE NOTICE OF  
NORTHERN STATES POWER COMPANY  
INFORMING THE COMMISSION OF XCEL  
ENERGY'S NEW NON-REGULATED  
OFFERINGS

DOCKET NO. E,G002/M-21-\_\_\_

**NOTICE**

**INTRODUCTION**

Northern States Power Company, doing business as Xcel Energy (NSPM or the Company), submits to the Minnesota Public Utilities Commission this Notice presenting a summary of a new Energy, Infrastructure and Sustainability program the Company is planning to offer to business customers in the near future. We believe this new program will provide our business customers with valuable tools to effectively manage their energy usage and meet their energy and sustainability goals.

The intent of the Company's new program is to provide services to our business customers that will enable them to develop and implement energy and sustainability strategies with minimal effort on their own part, allowing customers to focus on their core businesses. This program is available to businesses on an opt-in basis, and only businesses that choose to participate will be billed for the services they receive.

Historically, business customers have had to take time and resources from their core functions to manage their energy. This requires businesses to develop competencies in managing their energy and complying with energy-related regulations and ordinances – functions that take time and effort away from running their business. Additionally, businesses often have the desire to create and implement broad energy and sustainability goals but do not have the necessary know-how or budget to pursue these goals. We believe we are uniquely situated to help businesses simplify the process of creating and implementing their energy and sustainability strategies, and we are excited to launch a new program to help our customers achieve their goals.

While this new program is tangentially related to the Company's core services to current customers, it does not involve the provision of electric or gas "service" as that term is defined in Minn. Stat. § 216B.02, subd. 6,<sup>1</sup> and therefore we are not seeking approval of it as a regulated or tariffed service. However, to ensure the Commission is aware of the Company's new program, we are making this submission to provide a brief overview and an explanation of how we will separate the costs associated with this non-regulated program so that costs will not be included in our tariffed rates. NSPM is submitting this filing for informational purposes only and is not requesting any action by the Commission in relation to this new non-regulated program. To the extent the Commission believes it is necessary to approve the Company's proposed accounting treatment for this program, we respectfully request such approval.

Part V of this Notice provides additional detail regarding this new program. Part VI of this Notice explains how this new program differs from and complements our existing offerings. Part VII sets forth the guidelines we have developed to ensure full compliance with our rights and obligations to provide exclusive electric service under Minn. Stat. § 216B.40. Part VIII describes the accounting and cost allocation principles we have developed to ensure all costs and revenues associated with this new program are separated from our regulated businesses.

## **I. SUMMARY OF FILING**

A one-paragraph summary is attached to this filing pursuant to Minn. R. 7829.1300, subp. 1.

## **II. SERVICE ON OTHER PARTIES**

Pursuant to Minn. R. 7829.1300, subp. 2, Xcel Energy has served a copy of this filing on the Office of the Attorney General – Antitrust and Utilities Division. A summary of the filing has been served on all parties on the enclosed service list.

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<sup>1</sup> See, e.g., *In the Matter of Xcel Energy's Petition for Approval of Electric Vehicle Pilot Programs*, Minn. Ct. App., Sept. 21, 2020 at 11 ("Minnesota law vests the MPUC with 'the powers, rights, functions, and jurisdiction to regulate in accordance with the provisions of Laws 1974, chapter 429 every public utility.' Minn. Stat. § 216B.08 (2018). The MPUC 'may ascertain and fix just and reasonable standards, classifications, rules, or practices to be observed and followed by any or all public utilities with respect to the service to be furnished.' Minn. Stat. § 216B.09, subd. 1 (2018). 'Service,' in turn, is statutorily defined as 'natural, manufactured, or mixed gas and electricity; the installation, removal, or repair of equipment or facilities for delivering or measuring such gas and electricity.' Minn. Stat. § 216B.02, subd. 6 (2018).").

### **III. GENERAL FILING INFORMATION**

Pursuant to Minn. R. 7829.1300, subp. 3, Xcel Energy provides the following information.

#### **A. Name, Address, and Telephone Number of Utility**

Northern States Power Company doing business as:  
Xcel Energy  
414 Nicollet Mall  
Minneapolis, MN 55401  
(612) 330-5500

#### **B. Name, Address, and Telephone Number of Utility Attorney**

Shubha Harris  
Principal Attorney  
Xcel Energy  
414 Nicollet Mall, 401 – 8<sup>th</sup> Floor  
Minneapolis, MN 55401  
(612) 330-7641

#### **C. Date of Filing**

The date of this filing is May 12, 2021.

#### **D. Statute Controlling Schedule for Processing the Filing**

Commission Rules define this filing as a “miscellaneous filing” under Minn. R. 7829.0100, subp. 11 since no determination of Xcel Energy’s overall revenue requirement is necessary. Minn. R. 7829.1400, subp. 1 and 4 permit comments in response to a miscellaneous filing to be filed within 30 days and reply comments to be filed no later than 10 days thereafter.

#### **E. Utility Employee Responsible for Filing**

Amy A. Liberkowski  
Director, Regulatory Pricing & Analysis  
Xcel Energy  
414 Nicollet Mall, 401 – 7<sup>th</sup> Floor

Minneapolis, MN 55401  
(612) 330-6613

#### **IV. MISCELLANEOUS INFORMATION**

Pursuant to Minn. R. 7829.0700, NSPM requests that the following persons be placed on the Commission’s official service list for this proceeding:

Shubha Harris  
Principal Attorney  
Xcel Energy  
414 Nicollet Mall, 401 – 8<sup>th</sup> Floor  
Minneapolis, MN 55401  
[Shubha.M.Harris@xcelenergy.com](mailto:Shubha.M.Harris@xcelenergy.com)

Lynnette Sweet  
Regulatory Administrator  
Xcel Energy  
414 Nicollet Mall, 401 – 7<sup>th</sup> Floor  
Minneapolis, MN 55401  
[regulatory.records@xcelenergy.com](mailto:regulatory.records@xcelenergy.com)

Any information requests in this proceeding should be submitted to Ms. Sweet at the Regulatory Records email address above.

#### **V. OVERVIEW OF XCEL ENERGY’S NEW ENERGY, INFRASTRUCTURE AND SUSTAINABILITY PROGRAM**

Businesses are becoming increasingly interested in taking a more comprehensive approach in developing and implementing energy strategies. At the same time, they are becoming increasingly aware of their environmental impact and are looking for broader sustainability strategies to reduce their environmental impact. Through a more holistic approach, many customers can achieve their energy and sustainability goals.

The top two barriers businesses face in implementing energy and sustainability strategies are: (1) a lack of technical expertise; and (2) a lack of financial resources.<sup>2</sup> To address these barriers and to meet business customers’ financial and energy needs, the Company has developed an Energy, Infrastructure and Sustainability program.

Rather than forcing businesses to navigate a maze of services and vendors to develop new internal competencies, the Company’s new program removes the time and complexity involved with energy and sustainability while also meeting the customer’s desired energy and financial goals. This new program includes the following:

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<sup>2</sup> Bloomberg New Energy Finance report, “The Art of Financing the Behind-the-Meter C&I Energy Deal.”

- **Facility Management Services:** These services will focus on improvements or upgrades to commercial facilities such as office buildings, school districts, retail establishments, and healthcare facilities. For enrolled customers, the Company will conduct inventories of customers' facilities including their building systems and equipment to better understand their energy usage and/or resilience needs. Based on this inventory, the Company will provide customized recommendations on repairs or upgrades that could reduce the customer's energy consumption. The Company will then work with the customer to implement the solution including managing the engineering design, equipment procurement and installation, and ongoing monitoring of the solution. The Company may also finance certain equipment or system upgrades in order to relieve the customer of upfront capital expenditures.
- **Testing, Maintenance and Training Services:** These services will provide equipment-related services to business customers with significant equipment. Enrolled customers can choose to receive testing, preventative maintenance or repairs to their commercial equipment to ensure equipment is running efficiently, extend their service life, and reduce equipment downtime caused by failures. The Company will also offer training on equipment services to a business' employees to reduce costs businesses pay to third parties on equipment concerns.
- **Benchmarking Services:** These services will provide assistance to building owners required to comply with municipal benchmarking ordinances. The Company will collect and report the data to local municipalities on the customer's behalf. The Company will also provide recommendations to business owners on how to improve their benchmarking score.
- **Sustainability Services:** These services will provide strategic consulting services to business customers interested in reaching their carbon reduction goals and sustainability vision. The Company will offer a tailored approach to help businesses identify ways to integrate sustainability into their core operations, develop a sustainability plan, and provide assistance in implementing that plan.

Many of the Company's current customers have already expressed a desire for additional support from the Company in managing their energy usage and sustainability goals. School districts, universities, hospitals, retail establishments and many other business sectors are looking to the Company for help developing, implementing and measuring their energy and sustainability strategies. However, many customers simply do not have the bandwidth, resources or expertise to execute

and achieve their goals. Whether a small business or a large business, the Company's program can help customers build and achieve their energy and sustainability goals.

We are well-suited to provide these services because our customers view us as an energy expert. Customers are excited about our carbon-free energy vision and goals and believe we have the capabilities to reach these goals. Customers also want to be involved in the carbon-free movement and look to us for proper guidance on energy, equipment, and sustainability. To the extent a customer is interested in services that go beyond our areas of expertise, we intend to partner with third parties to provide a comprehensive program to our customers.

We are currently planning a phased launch of this program to business customers beginning in the second quarter of 2021. The full program is expected to be available by the end of 2021.<sup>3</sup>

Fees for this new program will depend on the complexity and scope of services the customer chooses. The fees and costs will be billed directly to the customer receiving the service and will not be included in the Company's rate base. The Company will offer a variety of flexible payment options including but not limited to one-time, monthly, or annual fees. Customers can choose to pay via their monthly energy bill or through a separate invoice.

## **VI. THIS PROGRAM COMPLEMENTS XCEL ENERGY'S CURRENT OFFERINGS**

This new program will complement the Company's existing Conservation Improvement Program (CIP) and Load Management (LM) programs in two key ways: (1) by expanding participation in existing CIP programs, and (2) by providing services not offered by CIP programs. For example, by identifying and financing projects that may be eligible to participate in CIP, customer access to CIP programs is increased. Additionally, customers wishing to utilize the benchmarking service may be able to improve their benchmarking score with a CIP or LM offering.

The Company's new program also offers additional capabilities that provide value to customers but would not meet the requirements of CIP or LM. For example, this new program will offer customers the option to enroll in maintenance and performance services. These services do not fall under CIP or LM guidelines. Customers may seek service pertaining to renewable energy strategies and

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<sup>3</sup> Xcel Energy offered the benchmarking service to a pilot customer on April 1, 2021 to meet the local ordinance June 1, 2021 benchmarking deadline.

implementation. This program may go beyond the Company's current renewable options. Customers may also want access to data management systems which function above and beyond what is currently rebated through the Company's CIP programs.

## **VII. GUIDING PRINCIPLES DEVELOPED TO ENSURE SEPARATION FROM REGULATED ACTIVITIES**

In developing and running this program, we will take steps to ensure we are not improperly leveraging our regulated services and exclusive electric service rights and obligations under Minn. Stat. § 216B.40. To do so, we have developed a set of guidelines applicable to our work in advancing these services. These guidelines are designed to ensure our regulated utility relationship with customers is sufficiently separated from this non-regulated program. The guidelines we have developed are as follows:

- Only customers participating in the program will be charged for services offered as part of the program.
- All costs associated with the program will be borne by the participating customers or the Company's shareholders and will not be borne by ratepayers. Costs, including any process, project, or service performed for the direct benefit of the Company's provision of a non-regulated program will be directly charged to the program. Such costs will include, but are not limited to, sales and marketing, customer service, information technology services, and facilities costs.
- Employees of NSPM's regulated business may inform potentially interested business customers of this program. Before proceeding, all informed customers will acknowledge that the services provided as part of the program may be available from another provider and that the program is not regulated by the Commission before enrolling in the program.
- NSPM customers exploring the program will be informed that their regulated rates and conditions of service provided by NSPM will not be affected by enrollment in the program, not enrolling in the program, or by their decision to participate in a competing offering from another provider.
- Absent a customer's consent to utilize their data, if NSPM chooses to mass market the program, we will only do so using publicly available information, by



making program information available on Xcel Energy's website, and/or by communicating with customers as set forth in these guidelines.

- To the extent employees of its regulated business perform work for the non-regulated program, the Company has trained employees of the regulated business on its processes to direct charge any time spent for the direct benefit of the non-regulated program. For example, as the primary point of contact for customers, NSPM Account Managers serving a regulated business customer may be involved with the setup and implementation of a customer's Energy, Infrastructure and Sustainability services. These Account Managers will direct charge time spent on the non-regulated program to separate account numbers established for the program. Other employees directly involved in the non-regulated program will be from the following departments: NSPM Community Relations Managers and Xcel Energy Services employees from Customer Solutions and Innovation, Account Management, Customer Contact Center, Billing, Information Systems, Corporate Communications, Accounting, Legal, Finance, Strategic Partnerships and Ventures, and Advertising and Brand. Again, any time spent by employees in these departments for the direct benefit of the non-regulated program will be directly charged to that program or allocated in accordance with the Company's Cost Allocation and Assignment Manual.

## **VIII. ACCOUNTING AND RATE TREATMENT FOR THE NON-REGULATED PROGRAM IN THIS NOTICE**

Consistent with the cost allocation principles approved by the Commission in its electric and gas rate cases (Docket Nos. E002-GR-92-1185, G002-GR-92-1186 and G002/GR-97-1606) and the Commission's September 28, 1994 Order in Docket No. G,E-999/CI-90-1008, the Company plans to provide this program as a non-regulated venture. Pursuant to the cost assignment and allocation principles established by the Commission, all costs will be directly assigned to either regulated or non-regulated activities whenever possible. Costs that cannot be directly assigned are common costs, which will be grouped into homogeneous cost categories. Each cost category will be allocated based on direct analysis of the origin of costs whenever possible. If direct analysis is not possible, common costs will be allocated based upon an indirect cost causation. If neither direct or indirect measures of cost causation can be found, the cost category will be allocated based upon a general allocator. This process accomplishes the proper separation of costs between NSPM's regulated utility business and non-regulated activities.

Company shareholders will make the necessary investment and assume all business risks associated with the operations. Customers choosing to enroll in the new program will bear 100% of the cost of the program delivered to them. Ratepayers will not be responsible for any risks associated with offering this program and ratepayers will not incur any increased costs. Costs associated with operating and maintaining this program will be segregated from the utility rate base for ratemaking purposes. The revenues and costs associated with these services will be identified by unique accounts and recorded in FERC 417, Revenues from Nonutility Operations; and FERC 417.1, Expenses from Nonutility Operations. The Company will provide the Commission with the cost categories assigned and allocated with this new program in future rate cases similar to what we provided the Commission for our non-regulated dealings related to Liberty Paper, Inc. (Docket No. E002/M-19-663) and MEC Holdings (Docket No. E002/AI-19-622).

### **CONCLUSION**

The Company is pleased to submit this filing for the Commission's information. We are excited to launch this new, innovative program that will further assist businesses with their energy needs. Should the Commission have any questions regarding this program, we look forward to answering them.

Dated: May 12, 2021

Northern States Power Company

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 THE NOTICE OF  
NORTHERN STATES POWER COMPANY  
INFORMING THE COMMISSION OF XCEL  
ENERGY'S NEW NON-REGULATED  
OFFERINGS

DOCKET NO. E,G002/M-21-\_\_\_\_

**NOTICE**

**SUMMARY OF FILING**

Please take notice that on May 12, 2021, Northern States Power Company doing business as Xcel Energy filed with the Minnesota Public Utilities Commission a Notice informing the Commission of NSPM's forthcoming non-regulated Energy, Infrastructure and Sustainability program. This program is designed to assist business customers implement energy and sustainability strategies.

## CERTIFICATE OF SERVICE

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

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

xx electronic filing

### **XCEL ENERGY MISCELLANEOUS ELECTRIC & GAS SERVICE LIST**

Dated this 12<sup>th</sup> day of May 2021

/s/

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Paget Pengelly  
Regulatory Administrator

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Alison C	Archer	aarcher@misoenergy.org	MISO	2985 Ames Crossing Rd  Eagan, MN 55121	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Elec_Xcel Miscl Electric and Gas
James J.	Bertrand	james.bertrand@stinson.com	STINSON LLP	50 S 6th St Ste 2600  Minneapolis, MN 55402	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Elec_Xcel Miscl Electric and Gas
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	GEN_SL_Northern States Power Company dba Xcel Energy-Elec_Xcel Miscl Electric and Gas
John	Coffman	john@johncoffman.net	AARP	871 Tuxedo Blvd.  St. Louis, MO 63119-2044	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Elec_Xcel Miscl Electric and Gas
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	No	GEN_SL_Northern States Power Company dba Xcel Energy-Elec_Xcel Miscl Electric and Gas
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George	Crocker	gwillc@nawo.org	North American Water Office	PO Box 174  Lake Elmo, MN 55042	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Elec_Xcel Miscl Electric and Gas
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	GEN_SL_Northern States Power Company dba Xcel Energy-Elec_Xcel Miscl Electric and Gas
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 280  Saint Paul, MN 551012198	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Elec_Xcel Miscl Electric and Gas

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Edward	Garvey	edward.garvey@AESLconsulting.com	AESL Consulting	32 Lawton St Saint Paul, MN 55102-2617	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Elec_Xcel Misc Electric and Gas
Todd J.	Guerrero	todd.guerrero@kutakrock.com	Kutak Rock LLP	Suite 1750 220 South Sixth Street Minneapolis, MN 554021425	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Elec_Xcel Misc Electric and Gas
Annete	Henkel	mui@mutilityinvestors.org	Minnesota Utility Investors	413 Wacouta Street #230 St.Paul, MN 55101	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Elec_Xcel Misc Electric and Gas
Michael	Hoppe	lu23@ibew23.org	Local Union 23, I.B.E.W.	445 Etna Street Ste. 61 St. Paul, MN 55106	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Elec_Xcel Misc Electric and Gas
Alan	Jenkins	aj@jenkinsatlaw.com	Jenkins at Law	2950 Yellowtail Ave.  Marathon, FL 33050	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Elec_Xcel Misc Electric and Gas
Richard	Johnson	Rick.Johnson@lawmoss.com	Moss & Barnett	150 S. 5th Street Suite 1200 Minneapolis, MN 55402	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Elec_Xcel Misc Electric and Gas
Sarah	Johnson Phillips	sarah.phillips@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Elec_Xcel Misc Electric and Gas
Mark J.	Kaufman	mkaufman@ibewlocal949.org	IBEW Local Union 949	12908 Nicollet Avenue South  Burnsville, MN 55337	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Elec_Xcel Misc Electric and Gas
Thomas	Koehler	TGK@IBEW160.org	Local Union #160, IBEW	2909 Anthony Ln  St Anthony Village, MN 55418-3238	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Elec_Xcel Misc Electric and Gas
Peder	Larson	plarson@larkinhoffman.com	Larkin Hoffman Daly & Lindgren, Ltd.	8300 Norman Center Drive Suite 1000 Bloomington, MN 55437	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Elec_Xcel Misc Electric and Gas

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Douglas	Larson	dlarson@dakotaelectric.com	Dakota Electric Association	4300 220th St W Farmington, MN 55024	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Elec_Xcel Miscl Electric and Gas
Eric	Lipman	eric.lipman@state.mn.us	Office of Administrative Hearings	PO Box 64620 St. Paul, MN 551640620	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Elec_Xcel Miscl Electric and Gas
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Pam	Marshall	pam@energycents.org	Energy CENTS Coalition	823 7th St E St. Paul, MN 55106	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Elec_Xcel Miscl Electric and Gas
Joseph	Meyer	joseph.meyer@ag.state.mn.us	Office of the Attorney General-RUD	Bremer Tower, Suite 1400 445 Minnesota Street St Paul, MN 55101-2131	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Elec_Xcel Miscl Electric and Gas
Stacy	Miller	stacy.miller@minneapolismn.gov	City of Minneapolis	350 S. 5th Street Room M 301 Minneapolis, MN 55415	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Elec_Xcel Miscl Electric and Gas
David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022093	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Elec_Xcel Miscl Electric and Gas
Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP	33 South Sixth St Ste 4200 Minneapolis, MN 55402	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Elec_Xcel Miscl Electric and Gas
David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency	220 South Sixth Street Suite 1300 Minneapolis, Minnesota 55402	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Elec_Xcel Miscl Electric and Gas
Carol A.	Overland	overland@legalelectric.org	Legalelectric - Overland Law Office	1110 West Avenue Red Wing, MN 55066	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Elec_Xcel Miscl Electric and Gas

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Elec_Xcel Misc Electric and Gas
Kevin	Reuther	kreuther@mncenter.org	MN Center for Environmental Advocacy	26 E Exchange St, Ste 206  St. Paul, MN 551011667	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Elec_Xcel Misc Electric and Gas
Richard	Savelkoul	rsavelkoul@martinsquires.com	Martin & Squires, P.A.	332 Minnesota Street Ste W2750  St. Paul, MN 55101	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Elec_Xcel Misc Electric and Gas
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th PI E Ste 350  Saint Paul, MN 55101	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Elec_Xcel Misc Electric and Gas
Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.	76 W Kellogg Blvd  St. Paul, MN 55102	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Elec_Xcel Misc Electric and Gas
Byron E.	Starns	byron.starns@stinson.com	STINSON LLP	50 S 6th St Ste 2600  Minneapolis, MN 55402	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Elec_Xcel Misc Electric and Gas
James M	Strommen	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered	150 S 5th St Ste 700  Minneapolis, MN 55402	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Elec_Xcel Misc Electric and Gas
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Lynnette	Sweet	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7  Minneapolis, MN 554011993	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Elec_Xcel Misc Electric and Gas



First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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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	GEN_SL_Northern States Power Company dba Xcel Energy-Elec_Xcel Miscl Electric and Gas
Samantha	Williams	swilliams@nrdc.org	Natural Resources Defense Council	20 N. Wacker Drive Ste 1600 Chicago, IL 60606	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Elec_Xcel Miscl Electric and Gas
Joseph	Windler	jwindler@winthrop.com	Winthrop & Weinstine	225 South Sixth Street, Suite 3500  Minneapolis, MN 55402	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Elec_Xcel Miscl Electric and Gas
Patrick	Zomer	Pat.Zomer@lawmoss.com	Moss & Barnett a Professional Association	150 S. 5th Street, #1200  Minneapolis, MN 55402	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Elec_Xcel Miscl Electric and Gas