



414 Nicollet Mall  
Minneapolis, Minnesota 55401

September 2, 2021

—Via Electronic Filing—

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

RE: REPLY COMMENTS  
2020 ANNUAL SERVICE QUALITY REPORT  
DOCKET NO. E002/M-21-237

Dear Mr. Seuffert:

Northern States Power Company, doing business as Xcel Energy, submits to the Minnesota Public Utilities Commission these Reply Comments in response to the August 16, 2021 Comments submitted in the above-referenced docket regarding our Annual Report on safety, reliability, and service quality and our proposed reliability standards for 2021.

We have electronically filed this document with the Commission, and copies have been served on the parties on the attached service list. Please contact me at 612-330-6935 or [gail.baranko@xcelenergy.com](mailto:gail.baranko@xcelenergy.com), or Pamela Gibbs at [pamela.k.gibbs@xcelenergy.com](mailto:pamela.k.gibbs@xcelenergy.com) or 612-330-2889 if you have any questions regarding this filing.

Sincerely,

/s/

GAIL A. BARANKO  
REGULATORY MANAGER

Enclosures  
c: Service List

STATE OF MINNESOTA  
BEFORE THE  
MINNESOTA PUBLIC UTILITIES COMMISSION

Katie J. Sieben	Chair
Valerie Means	Commissioner
Matthew Schuerger	Commissioner
Joe Sullivan	Commissioner
John Tuma	Commissioner

IN THE MATTER OF NORTHERN STATES  
POWER COMPANY'S ANNUAL REPORT ON  
SAFETY, RELIABILITY, AND SERVICE  
QUALITY FOR 2020; AND PETITION FOR  
APPROVAL OF ELECTRIC RELIABILITY  
STANDARDS FOR 2021

DOCKET NO. E002/M-21-237

**REPLY COMMENTS**

**INTRODUCTION**

Northern States Power Company, doing business as Xcel Energy, submits to the Minnesota Public Utilities Commission these Reply Comments in response to the August 16, 2021 Comments in the above-referenced docket regarding our Annual Report on safety, reliability, and service quality and our proposed reliability standards for 2021.

Comments were filed by the Minnesota Department of Commerce, Division of Energy Resources (Department), Energy CENTS Coalition (ECC), and the Environmental Law and Policy Center and Vote Solar (ELPC/Vote Solar). We appreciate the detailed review of our Annual Report; and in this Reply, we respond to comments and provide additional information requested. We continue to request that the Commission accept our Annual Report on safety, reliability, and service quality, and approve our proposed reliability standards for 2021 as detailed in our April filing and as discussed in these Reply Comments.

**REPLY COMMENTS**

**A. Response to Department Recommendations**

In their Comments, the Department recommends approval our Annual Report for 2020. They also recommend the Commission approve additional requirements for

the Company's 2021 Annual Report to be filed April 1, 2022. These requirements would include: (1) reporting on usage of electronic customer-service tools, and (2) analysis of a theoretical sale of a portion of the Company's Southeast service territory. We appreciate the Department's recommendation for acceptance of our Annual Report, and we address the additional reporting recommendations in the following sections.

The Department also supports use of the IEEE benchmarking analysis for reliability and is open to using the IEEE benchmarking results to set future reliability standards, as the Company has proposed. Because IEEE benchmarking results for a given year are not available until the third quarter of the following year (*i.e.*, after the annual reports are filed), the Department recommends that utilities make supplemental filing within 20 days after receiving the IEEE benchmarking data. The Company agrees with the Department's proposed process for future reporting cycles, which will allow for the review of the Company's reliability performance compared to IEEE benchmarking data.

The Department's also requests that the Company provide additional information in these Reply Comments on various topics. We address each of these requests below.

*1. Reporting on Usage of Electronic Customer-service Tools*

The Department recommends that the Commission require the Company to provide additional information for the next two reporting cycles on certain web-based utility-customer service tools, with the goal of developing benchmarks for those same tools. Department recommends that utilities provide, at a minimum, the following:

- The percentage uptime, to the second decimal, of the utility's general website, payment services, and outage map and/or information page.
- The error rate percentage, to the third decimal, of the utility's payment services. If more granular data is available, the Department requests that utilities break down the error rate for unexpected errors, errors outside of the customer's control (*i.e.*, how often to online payments fail for reasons other than insufficient funds or expired payment methods), and/or some other meaningful categorization.

We understand that the Company's electronic customer-service tools to which these reporting requirements would apply would include the Xcel Energy website (xcelenergy.com), the MyAccount platform which provides customer payment services, and the xcelenergy.com web pages that provide outage information (the

electric outage map and the functionality to report an outage). Generally, the Company would be able to report the data requested on a going-forward basis. Because we do not currently track data in this way, this would require new programming to comply with any new reporting requirements. Because the Company would need to assess available data and programming necessary to comply with any new reporting requirements, we may not be able to include complete data for 2021 in our April 2022 report.

We appreciate that the Department has proposed this reporting on a going-forward basis rather than requiring historic information. As we have experienced, looking back at historical data for comparison purposes might be difficult as systems change over the years. The Company has no objection to providing this information on a going-forward basis, and we understand it may be used for future benchmarking and potential development of target metrics. That said, we note that in our performance based rates (PBR) proceeding,<sup>1</sup> the Company has proposed that three years of data be reported for new metrics, after which time the data could be analyzed to develop appropriate benchmarking and threshold requirements. Parties have generally supported this approach in comments in the PBR docket. As such, we note that it may be appropriate to consider three years of data in developing new benchmarking targets in this service quality proceedings as well.

In addition to the recommended reporting, the Department also requested that the Company discuss in Reply Comments whether there is a chat feature on the Xcel Energy website, and if the Company uses internal or third-party monitoring of website functionality. We provide our responses below:

- The Company does not currently have a chat feature available on its website. We are exploring the chat feature for potential use in the future, but the Company does not have plans to implement a chat feature at this time. If the Commission approves new reporting for web-based customer service tools, and if the Company plans to implement a chat feature in the future, we would provide an update to the Commission in a future annual report.
- Regarding monitoring website functionality, the Company uses both in-house and external services to monitor the health of our website. All on-call services to address any critical website failures are in-house. If the Commission approves new reporting for web-based customer service tools in the next annual report, the Company would provide the required statistics along with a discussion of how the Company tracks and monitors the web-based customer service tools.

---

<sup>1</sup> Docket No. E002/17-401.

## 2. *Analysis of Theoretical Sale of a Portion of the Company's Service Territory*

The Department recommends that the Commission require the Company to perform an analysis that models the effects of selling some portion of the service territory contained in the Company's Southeast work center on that work center's reliability metrics for inclusion in the Company's 2021 Annual Report.

We fully recognize that the Southeast reliability performance is not up to the Commission's standards; reliability performance is not up to the Company's standards either. The Company is currently providing quarterly reports for the Southeast work center.<sup>2</sup> These reports include the Southeast reliability results on a quarterly basis and discussion of plans for improvement and progress on those plans during the previous quarter. Although there are challenges related to reliability in this more rural area of our service territory, we are committed to improving the reliability for our customers in Southeast work center.

The Company is not considering selling any portion of the Southeast service territory, nor do we believe such a measure would necessarily be beneficial for customer or remedy any reliability issues. Further, we note that the quarterly reports we have been providing since May 5, 2020 address plans for improvements, and work continues in these areas, with reporting currently schedule through the fourth quarter of 2021. We believe it would be premature to perform the analysis the Department has suggested at this point given that the Company is actively working toward reliability improvements at this time.<sup>3</sup>

## 3. *Infographic Redesign*

The Department recommended a redesign of the Company's Customer Service Quality and Reliability Metrics infographic to narrow the focus and include certain additional data related to customer service and reliability.

Specifically, the Department suggests that the Company remove general information related to Xcel Energy Minnesota, enhancing the customer experience, and the Company's commitment to reliability. The Department also recommends that the Company include comparisons of the following:

---

<sup>2</sup> These quarterly reports are submitted in compliance with Order Point 5d of the Commission's January 28, 2020 Order in Docket No. E002/M-19-261 and Order Point 3 of the Commission's December 18, 2020 Order in Docket No. E002/M-20-406.

<sup>3</sup> In addition, analyzing a theoretical sale of a portion of our service territory would have wide-ranging effects beyond impacts to reliability metrics.

- 1) its actual reliability performance to the Commission's goals for the previous year;
- 2) the number of customer complaints compared to a five-year average; and
- 3) contact information for the Commission's Consumers Affairs Office in case a customer has questions or a complaint.

The Company has no objections to making these changes to the infographic. Per prior Commission Order, authority to approve the material in the infographic was delegated to Commission Staff.<sup>4</sup> Barring any additional review or proposed changes by Commission Staff, if the Commission approves the infographic in this proceeding, the Company intends to submit the revised infographic, including the changes recommended by the Department, as a compliance filing in this docket.

#### *4. Vegetation Management*

The Department requested that the Company provide additional information about why the Company's vegetation management expenditures decreased from 2019 to 2020. The Company provided vegetation management expenditure information for 2018 through 2020 in Attachment D to our Annual Report. The table below reflects that data as well as the 2016 and 2017 expenditures we provided in previous annual reports.<sup>5</sup>

<b>Year</b>	<b>T&amp;D Vegetation Management Actual Expenditures (\$000)</b>
2016	\$26,247
2017	\$29,024
2018	\$29,352
2019	\$31,963
2020	\$20,633

The Company has established a five-year routine maintenance cycle for its distribution facilities, meaning that in general, vegetation around our electric facilities will be maintained every five years. Being as close as practicable to maintain the established five-year trim cycle helps to ensure that preventable tree-related interruptions are minimized, public and employee safety is addressed, and various regulatory compliance requirements are met. As shown in the table above, prior to 2020, the

---

<sup>4</sup> Order Point 17, December 18, 2020 Commission Order in Docket No. E002/M-20-406.

<sup>5</sup> See 2016 and 2017 data included in April 1, 2019 Annual Report in Docket No. E002/M-19-261.

Company's vegetation management expenditures were relatively consistent over this period.

While the initial 2020 vegetation management budget was based on work required to maintain the five-year cycle, certain aspects of the Company's operations in 2020 were impacted by the COVID-19 public health emergency. In response to the impact that COVID-19 had on our communities, customers, and operations in 2020, Distribution adjusted operations to maintain financial flexibility as the Company faced uncertainties about the depth and duration of the impacts of COVID-19. This included temporary reductions to O&M expenses where possible without impacting the safety of our customers or employees. Among the adjustments, Distribution temporarily reduced vegetation management activities in 2020.

Distribution has planned to make up for this shortfall by increasing the budgets to complete vegetation management activities for additional line miles in 2021 and subsequent years. The Company will report on the 2021 actual spending in our next annual report to be filed in April 2022.

#### *5. Call Center Operations and Response Time*

The Department recommended that the Company provide updated information on the progress it has made regarding hiring new call center representatives in 2021 and the effects of those new employees on its agent-only metrics.

As discussed in our April 2021 filing, at the close of 2020, the Company was responding to the impacts of COVID-19 on our call center performance, and we were engaged in additional hiring efforts to bring the call centers up to needed staffing levels. The Company had hired 111 residential and customer service agents between March and December of 2020. At the beginning of 2021, contact centers were staffed to approximately 85 percent of actual need.

In 2021 to date, the customer service and credit contact centers have hired 153 agents. However, there have been 124 departures, which has counteracted the impact of the additional hiring. Due to the higher than expected attrition rate, the contact centers are currently staffed to approximately 65 percent of actual need. Post-COVID trends have made it difficult to fill front-line customer service jobs and retain those employees, which is consistent with what we are hearing from other call centers, both within and outside of the utility industry. We have been talking with other utilities around recruiting, training, and retention efforts as we work to improve the employee experience and keep more people. As is expected, newly hired employees in the call center tend to have longer call handle times as they work towards becoming proficient

in their roles. The amount of turnover in our call centers means we have a large portion of agents newly graduated from the training, which impacts our average call handle time and overall call center metrics. In addition, we have experienced higher temperatures in our various jurisdictions, which results in higher cooling costs for our customers. High Bill calls in general take more time to discuss all the potential causes and resolutions with customers, which has also impacted our agent-only call center metrics.

Hiring efforts will continue through year end, and the Company is further expanding these efforts into new communities, in addition to those discussed in our April 2021 filing. These new communities include Clovis, NM, La Crosse, WI, and Barron County, WI where we are advertising job openings for permanent home-based agents. We continue to work toward improving our customer experience and reaching our targeted customer service response levels that we have consistently achieved in the past. The Company will provide additional discussion of these call center hiring efforts and staffing levels and will report the full-year 2021 call center metrics in our April 2022 report.

#### *6. Call Center Complaints*

The Department recommended that the Company provide additional discussion of the Company's expectation for the number of complaints handled by customer agents in 2021.

As shown in our Annual Report, the overall number of complaints handled by call center agents in 2020 was lower than previous years. This was largely driven by reduction in complaints in the Wrongful Disconnect category, where complaints from customers are typically related to credit and collection activities that may result in service disconnection. Since credit and collection activity and disconnections were suspended during all of 2020, there was a reduction in customer complaints in that category.

For 2021, credit and collections activity was suspended for the first half of the year. As such, complaints in the Wrongful Disconnect category in 2021 may increase compared to 2020 as we begin to issue disconnection notices during the second half of the year. As we work to improve overall call center performance, other process changes may also impact statistics for 2021. We will provide a discussion of the full 2021 data and call center activity in our April 2022 report.



## 7. *DER Compliant Category*

The Department requested that the Company provide additional information on the possibility of developing a complaint category for Distributed Energy Resources (DER) customers by customer class. These would be complaints received in our call center and handled by call center agents.

We appreciate the Department's acknowledgement that this is complicated by the fact that DER customers may both buy and sell electricity to the Company. As such, some complaints received in the call center that may be attributed to a "DER customer" could in fact be related to such things as the provision of general service to that customer or a general billing error rather than DER itself. These are among the details that should be considered in the development of any new DER category for call center complaints.

We are currently participating in quarterly meetings of a work group convened by Commission Staff, including the Consumer Affairs Office. This group, which also includes the Department, Minnesota Power, and Otter Tail Power, agreed to work together to further refine complaint category definitions and consider the addition of potential new categories. These quarterly meetings are continuing in 2021, with the goal of establishing a recommendation for use in the next calendar year (2022).

### **B. Response to ECC Recommendations**

ECC provided comments relating to their recommendations for mapping various program participation levels as part of Xcel Energy's reliability and equity mapping initiative that is currently underway. The equity mapping efforts have been a part of various dockets over time. Below, we clarify our understanding of how the ECC recommendations will be addressed and provide our response to the specific equity mapping recommendations.

In our PBR proceeding,<sup>6</sup> the Commission established future performance metrics to be developed for Xcel Energy, including locational reliability and equity measures. Subsequently, the Commission moved development of those metrics to Xcel Energy's annual service quality reports going forward.<sup>7</sup> Commission Staff then issued a notice in our 2020 service quality docket<sup>8</sup> for stakeholder workshops on Xcel Energy's reliability and equity mapping. The goal of the stakeholder process is to develop plans

---

<sup>6</sup> See Commission Order dated September 18, 2019 in Docket No. E002/CI-17-401.

<sup>7</sup> See Commission Order dated January 28, 2020 in Docket No. E002/M-19-261.

<sup>8</sup> See Notice for Commission Stakeholder Workshops dated June 3, 2021 in Docket Nos. E002/20-406 and E002/CI-17-401.

for initial interactive mapping capabilities that will provide the Company's reliability performance overlaid with demographic data. For initial development, this process is currently focused on mapping disconnections, customers experiencing long interruptions (CELI), and customers experiencing multiple interruptions (CEMI) along with demographic information overlays.

The Company is currently developing sample maps to share with stakeholders in September for feedback on possible refinements to the data displays. Xcel Energy will file a status update on the stakeholder workshops by October 1, 2021. Once the details are finalized and initial interactive maps are built using the 2020 census data, the Company would publish these maps on the Xcel Energy website.

ECC has recommended that the Company also map program participation in the Low-Income Home Energy Assistance Program (LIHEAP), low-income Conservation Improvement Program (CIP), and affordability programs (POWER On and Gas Affordability Program). We appreciate that ECC has recommended addressing this as part of the mapping initiative that is currently underway. We are open to investigating the development of mapping program participation as ECC has recommended once the baseline mapping capabilities previously discussed have been implemented. The Company proposes to provide additional information relative to ECC's recommendations in our next annual service quality report to be filed in April 2022.

### **C. Response to ELPC/Vote Solar Recommendations**

ELPC/Vote Solar recommended that the Commission require additional reporting on locational reliability and equity measures and that the Company propose locational reliability and equity performance targets in its next safety, reliability and service quality report to be filed in April 2022.<sup>9</sup> We appreciate that ELPC/Vote Solar acknowledged that the Company has provided the reliability and equity data required by prior Commission order in Attachment A to our April 2020 filing and recommended that the Commission accept the Company's annual report. Below we provide our response to ELPC/Vote Solar's other specific recommendations.

#### *1. Locational Reliability and Equity Reporting*

ELPC/Vote Solar recommended that the Commission add locational reliability and equity reporting requirements for the next annual report to focus on census tracts as

---

<sup>9</sup> ELPC/Vote Solar also made a recommendation related to establishing performance metrics for the locational reliability and equity targets in the context of the PBR docket, which is outside the scope of this current proceeding. We understand any future metrics will be addressed in the PBR docket and have not addressed this recommendation in these reply comments.

the unit of analysis and aggregating individual customer data at the census tract level rather than on grid topology.<sup>10</sup> This would be similar, but in addition, to the reporting already required in Attachment A.

For the purposes of mapping locational reliability, the Company is able to provide CEMI and CELI data by census area from our outage data at the premise level. Much of the information ELPC/Vote Solar proposes as additional reporting is not readily available from our outage data system. Additional methodologies and data analytics tools will be necessary for the level of reporting recommended by ELPC/Vote Solar. The Advanced Metering Infrastructure (AMI) may be one of those tools; however, the use case of AMI data for reliability reporting is only in preliminary stages and will require significant work to determine future capabilities. Additionally, AMI deployment will be starting in 2022, with an expected completion date in 2024. Therefore, if AMI data can be leveraged for additional reporting, complete data sets would not be available until after 2024. To maintain accurate reporting, estimation of reliability data as suggested by ELPC/Vole Solar based on partial data and AMI deployment should not be considered. The Company is still evaluating how AMI and other data analytics tools can support our reliability reporting needs.

For these reasons, we request that the Commission allow the Company to continue investigating methodologies and reporting that will provide meaningful data rather than defining additional reliability and equity reporting requirements at this time. We propose to provide information in future Annual Reports on how the Company can move towards reporting more locational reliability information.

## *2. Locational Reliability and Equity Performance Targets*

ELPC/Vote Solar recommended that the Commission direct the Company to propose locational reliability and equity performance targets in our next annual service quality report to be filed in April 2022.

Because there is no baseline data available for analysis, we believe it would be premature to require the Company to propose reliability and equity performance targets in its next annual report. Further, and as noted earlier, the Company proposed in our PBR proceeding that three years of data be reported for new metrics, after which time the data could be analyzed to develop appropriate benchmarking and threshold requirements. Parties have generally supported this

---

<sup>10</sup> Census tracts contain smaller census “block groups.” The Company is preparing its reliability/equity maps at the block group level, which provides an additional level of granularity.

approach in comments in the PBR docket. We recommend the same approach in this service quality docket.

ELPC/Vote Solar also suggested that these targets should be similar to the Company's conventional reliability performance targets already established. We note that our conventional reliability performance targets are applicable to all our customers regardless of location or demographics. Indeed, the goal of the current reliability and equity initiative is to develop data and reporting that will provide information on the Company's reliability performance with respect to various demographic measures. Over time, this data could indicate whether there is any correlation between reliability and demographics. Once sufficient data is available for this analysis, appropriate benchmarking measures and performance targets could then be developed. For these reasons, we believe it would be premature to require the Company to propose locational reliability and equity performance targets in its next annual report.

## **CONCLUSION**

Xcel Energy is committed to providing our customers with safe, reliable, and quality customer service. We appreciate the review of our Annual Report by the Department, ECC, and ELPC/Vote Solar. We continue to request that the Commission accept our Annual Report on safety, reliability, and service quality and approve our proposed reliability standards for 2021 as detailed in our April filing and as discussed in these Reply Comments. We also continue to request the Commission grant a variance of Minn. R. 7826.0500, Subpart 1.G as discussed in our April 2021 Petition.

Dated: September 2, 2021

Northern States Power Company

## CERTIFICATE OF SERVICE

I, Lynnette Sweet, 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

**Docket No. E002/M-21-237**

Dated this 2nd day of September 2021

/s/

---

Lynnette Sweet  
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	OFF_SL_21-237_Official
James J.	Bertrand	james.bertrand@stinson.com	STINSON LLP	50 S 6th St Ste 2600  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-237_Official
James	Canaday	james.canaday@ag.state.mn.us	Office of the Attorney General-RUD	Suite 1400 445 Minnesota St. St. Paul, MN 55101	Electronic Service	No	OFF_SL_21-237_Official
John	Coffman	john@johncoffman.net	AARP	871 Tuxedo Blvd.  St, Louis, MO 63119-2044	Electronic Service	No	OFF_SL_21-237_Official
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_21-237_Official
Riley	Conlin	riley.conlin@stoel.com	Stoel Rives LLP	33 S. 6th Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-237_Official
Brooke	Cooper	bcooper@allte.com	Minnesota Power	30 W Superior St  Duluth, MN 558022191	Electronic Service	No	OFF_SL_21-237_Official
George	Crocker	gwillic@nawo.org	North American Water Office	PO Box 174  Lake Elmo, MN 55042	Electronic Service	No	OFF_SL_21-237_Official
John	Farrell	jfarrell@ilsr.org	Institute for Local Self-Reliance	2720 E. 22nd St Institute for Local Self-Reliance Minneapolis, MN 55406	Electronic Service	No	OFF_SL_21-237_Official
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 280  Saint Paul, MN 551012198	Electronic Service	No	OFF_SL_21-237_Official

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	OFF_SL_21-237_Official
Adam	Heinen	aheinen@dakotaelectric.com	Dakota Electric Association	4300 220th St W  Farmington, MN 55024	Electronic Service	No	OFF_SL_21-237_Official
Michael	Hoppe	lu23@ibew23.org	Local Union 23, I.B.E.W.	445 Etna Street Ste. 61 St. Paul, MN 55106	Electronic Service	No	OFF_SL_21-237_Official
Alan	Jenkins	aj@jenkinsatlaw.com	Jenkins at Law	2950 Yellowtail Ave.  Marathon, FL 33050	Electronic Service	No	OFF_SL_21-237_Official
Richard	Johnson	Rick.Johnson@lawmoss.com	Moss & Barnett	150 S. 5th Street Suite 1200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-237_Official
Sarah	Johnson Phillips	sarah.phillips@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-237_Official
Mark J.	Kaufman	mkaufman@ibewlocal949.org	IBEW Local Union 949	12908 Nicollet Avenue South  Burnsville, MN 55337	Electronic Service	No	OFF_SL_21-237_Official
William D	Kenworthy	will@votesolar.org	Vote Solar	332 S Michigan Ave FL 9  Chicago, IL 60604	Electronic Service	No	OFF_SL_21-237_Official
Thomas	Koehler	TGK@IBEW160.org	Local Union #160, IBEW	2909 Anthony Ln  St Anthony Village, MN 55418-3238	Electronic Service	No	OFF_SL_21-237_Official
Peder	Larson	plarson@larkinhoffman.com	Larkin Hoffman Daly & Lindgren, Ltd.	8300 Norman Center Drive Suite 1000 Bloomington, MN 55437	Electronic Service	No	OFF_SL_21-237_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Kavita	Maini	kmaini@wi.rr.com	KM Energy Consulting, LLC	961 N Lost Woods Rd Oconomowoc, WI 53066	Electronic Service	No	OFF_SL_21-237_Official
Pam	Marshall	pam@energycents.org	Energy CENTS Coalition	823 7th St E St. Paul, MN 55106	Electronic Service	No	OFF_SL_21-237_Official
Joseph	Meyer	joseph.meyer@ag.state.mn.us	Office of the Attorney General-RUD	Bremer Tower, Suite 1400 445 Minnesota Street St Paul, MN 55101-2131	Electronic Service	No	OFF_SL_21-237_Official
Stacy	Miller	stacy.miller@minneapolismn.gov	City of Minneapolis	350 S. 5th Street Room M 301 Minneapolis, MN 55415	Electronic Service	No	OFF_SL_21-237_Official
David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022093	Electronic Service	No	OFF_SL_21-237_Official
Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP	33 South Sixth St Ste 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-237_Official
David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency	220 South Sixth Street Suite 1300 Minneapolis, Minnesota 55402	Electronic Service	No	OFF_SL_21-237_Official
Carol A.	Overland	overland@legalelectric.org	Legaletric - Overland Law Office	1110 West Avenue Red Wing, MN 55066	Electronic Service	No	OFF_SL_21-237_Official
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_21-237_Official
Kevin	Reuther	kreuther@mncenter.org	MN Center for Environmental Advocacy	26 E Exchange St, Ste 206 St. Paul, MN 551011667	Electronic Service	No	OFF_SL_21-237_Official



First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Richard	Savelkoul	rsavelkoul@martinsquires.com	Martin & Squires, P.A.	332 Minnesota Street Ste W2750  St. Paul, MN 55101	Electronic Service	No	OFF_SL_21-237_Official
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th PI E Ste 350  Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-237_Official
Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.	76 W Kellogg Blvd  St. Paul, MN 55102	Electronic Service	No	OFF_SL_21-237_Official
Byron E.	Starns	byron.starns@stinson.com	STINSON LLP	50 S 6th St Ste 2600  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-237_Official
James M	Strommen	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered	150 S 5th St Ste 700  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-237_Official
Eric	Swanson	eswanson@winthrop.com	Winthrop & Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_21-237_Official
Lynnette	Sweet	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7  Minneapolis, MN 554011993	Electronic Service	Yes	OFF_SL_21-237_Official
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_21-237_Official
Lisa	Veith	lisa.veith@ci.stpaul.mn.us	City of St. Paul	400 City Hall and Courthouse 15 West Kellogg Blvd. St. Paul, MN 55102	Electronic Service	No	OFF_SL_21-237_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Joseph	Windler	jwindler@winthrop.com	Winthrop & Weinstine	225 South Sixth Street, Suite 3500  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-237_Official
Patrick	Zomer	Pat.Zomer@lawmoss.com	Moss & Barnett a Professional Association	150 S. 5th Street, #1200  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-237_Official