

September 5, 2025

PUBLIC DOCUMENT

Mike Bull
Interim Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, Minnesota 55101-2147

RE: **PUBLIC** Comments of the Minnesota Department of Commerce
Docket No. E002/M-24-432

Dear Mr. Mike Bull:

Attached are the initial **PUBLIC** comments of the Minnesota Department of Commerce (Department) in the following matter:

*In the Matter of a Peak Time Rebate Program for Northern States Power
Co. d/b/a Xcel Energy to Further the Commission's Advanced Rate Design
Efforts in Docket No. E002/CI-24-115*

A notice of comment was filed by the Commission on July 17, 2025, and a notice of extended comment period was issued on August 12, 2025.

The Department provides recommendations on Xcel Energy's proposed Peak Time Rebate Program and is available to answer any questions the Minnesota Public Utilities Commission may have.

Sincerely,

/s/ Dr. SYDNIE LIEB
Assistant Commissioner of Regulatory Analysis

AB/RW/ar
Attachment



Before the Minnesota Public Utilities Commission

PUBLIC Comments of the Minnesota Department of Commerce

Docket No. E002/M-24-432

I. INTRODUCTION

On July 17, 2025, the Minnesota Public Utilities Commission (Commission) issued a Notice of Comment Period in Docket No. E002/M-24-432. The Commission invited stakeholder input on whether the Commission should approve, modify, or reject the proposed Peak Time Rebate (PTR) program filed by Northern States Power Company, d/b/a Xcel Energy (Xcel).

The Department finds that there is insufficient data to determine the benefits of PTR for ratepayers and the grid. The Department recommends that Xcel first implement PTR as a pilot to gather more data and file a proposal for a full program as part of the Company's 2027-2029 Energy Conservation and Optimization (ECO) Triennial Plan.

II. PROCEDURAL BACKGROUND

December 30, 2024	The Commission delegated the Executive Secretary to "open a docket to evaluate a proposal for a peak-time rebate (PTR) program for Xcel Energy." ¹
January 8, 2025	The Commission issued a Notice of Docket Opening for Docket No. E002/M-24-432 in accordance with its December 30, 2024, directive. ²
March 17, 2025	Xcel Energy filed a Petition for approval to replace the Company's Energy Action Days program with a PTR program as part of its 2024-2026 Energy Conservation and Optimization (ECO) Triennial Plan. ³

¹ *In the Matter of the Application of Xcel Energy for Authority to Increase Rates for Electric Service in Minnesota, Notice of and Order for Hearing*, December 30, 2024, Docket No. E-002/GR-24-320, (eDockets) [202412-213391-01](#).

² *In the Matter of a Peak Time Rebate Program for Northern States Power Co. d/b/a Xcel Energy to Further the Commission's Advanced Rate Design Efforts in Docket No. E002/CI-24-115, Notice of Docket Opening*, January 8, 2025, Docket No. E-002/M-24-432, (eDockets) [20251-213658-01](#).

³ *In the Matter of a Peak Time Rebate Program for Northern States Power Co. d/b/a Xcel Energy to Further the Commission's Advanced Rate Design Efforts in Docket No. E002/CI-24-115*, Xcel Energy, Initial Filing, March 17, 2025, Docket No. E-002/M-24-432, (eDockets) [20253-216468-01](#), (hereinafter, Xcel Petition).

Analysts assigned: Andy Bahn, Rachel Wiedewitsch

July 17, 2025

The Commission issued a Notice of Comment Period seeking input on whether the Commission should approve, modify, or reject Xcel Energy's proposed PTR program.⁴

Topic(s) open for comment:

Merits of the Proposal

1. Is Xcel's proposed PTR program design reasonable and in the public interest?
2. Are Xcel's proposed eligibility rules reasonable, including the proposal to exclude current demand response program participants?
3. Is the Company's proposed budget reasonable, including third-party vendor expenses?
4. Is the Company's proposed customer outreach and communications plan reasonable?
5. Is the Company's cost-effectiveness assessment reasonable?
6. Should the Commission consider recent increases in the Midcontinent Independent System Operator (MISO) capacity auction clearing prices when assessing the cost-effectiveness assessment?
7. Should the Commission require any modifications to the program to increase the scale and/or equity of system benefits that can be delivered?
8. Are there program design, implementation, and evaluation elements that have proven successful in similar programs, such as Connexus's Peak Time Rebate program, that the Commission should direct Xcel to incorporate

Program Evaluation

9. What reporting should the Commission require the Company to provide, and on what cadence?
10. Should the Commission require an assessment of the program's performance and scaling opportunities after a certain duration?

Cost Recovery

11. What method of cost recovery is allowable and appropriate for program costs, if approved? For example, should the Commission authorize the Company to seek future cost recovery through Xcel's ECO Portfolio, or direct the Company to use an alternate cost recovery method?

Guidance

12. Is there direction the Commission could provide to Xcel regarding other programs, whether existing or future, that may qualify for ECO and require substantive Commission review and/or tariff?

Other

13. Are there other issues or concerns related to this matter?

⁴ In the Matter of a Peak Time Rebate Program for Northern States Power Co. d/b/a Xcel Energy to Further the Commission's Advanced Rate Design Efforts in Docket No. E002/CI-24-115, Notice of Comment Period, July 17 2025, Docket No. E-002/M-24-432, (eDockets) [20257-221115-01](#).

III. DEPARTMENT ANALYSIS

A. BACKGROUND

Xcel Energy has operated a behavioral demand response program called Energy Action Days (EAD) since 2022, and the program is currently under the Company's 2024-2026 Energy Conservation and Optimization (ECO) Triennial Program. Through EAD, Xcel sends event notifications to participants to encourage them to reduce energy consumption during peak hours. Participation is entirely voluntary, and there are no rebates for participation or penalties for non-participation. There are currently approximately 550,000 customers enrolled in Energy Action Days.⁵

In Xcel Energy's March 17, 2025, filing, the Company proposes to replace the EAD program with a Peak Time Rebate (PTR) program, as a modification to the 2024-2026 ECO Triennial Plan.⁶ Like EAD, the PTR program would encourage customers to reduce load during peak hours during three to five events per year. However, PTR participants would earn a rebate of \$1/kWh for their load reduction.⁷ Xcel proposes to implement the PTR program on an opt-in basis (meaning that customers would have to sign up to join the program), and any customers who have an AMI meter and allow the Company to contact them via email and/or text are eligible for PTR, except for net metering customers and those already participating in another demand response program (such as AC Reward or Saver's Switch).⁸ Xcel plans to initially target EAD participants who are not enrolled in other demand response programs and expects to enroll approximately 15,500 customers in the first year of PTR.⁹

Xcel estimates the annual budget for the program at approximately \$1.1 million, with a cost breakdown as follows:¹⁰

Table 1. PTR 2026 Budget

Budget Category	2026 Expenses
Vendor	\$800,000
Rebates	\$187,500
Technology Services	\$50,000
Administration	\$80,000
Marketing	\$20,000
Total	\$1,137,500

The Company expects the average peak savings per customer to be 0.63 kW, or 2.5 kWh over a 4-hour event. The benefit-cost ratio for the program during its first year is 1.01 using the Minnesota Test and 0.98 using the Ratepayer Impact Measure.¹¹

⁵ Xcel Petition, at 5.

⁶ *Ibid.*

⁷ *Id.*, at 9.

⁸ *Id.*, at 10.

⁹ *Id.*, at 12.

¹⁰ *Id.*, at 14.

¹¹ *Id.*, at 15-16.

Xcel states that it will conduct a program evaluation after establishing sufficient participation and will provide those results as part of future ECO Status Reports. The Company will also provide plans for program expansion in the 2027-2029 ECO Triennial Plan.¹²

B. QUESTIONS TO BE ANSWERED

B.1. Is Xcel's proposed PTR program design reasonable and in the public interest?

While Xcel's proposal presents a first step in exploring the long-term benefits of PTR to ratepayers and the grid, there is not enough information to determine at this time whether the PTR program would be in the public interest. First, the program barely passed a benefit-cost analysis (BCA) using the Minnesota Test, with a benefit-cost ratio of 1.01, while the Ratepayer Impact Measure test shows that the program would result in a small increase in rates for ratepayers, with a benefit-cost ratio of 0.98. Some assumptions, such as the average load reduction per customer, can dramatically change the results of the BCA. If load reductions under the program are lower than the 0.63 kW assumed, the benefits of the program will be lower (discussed more in Section B.5 below). On the other hand, the BCA provided in Xcel's petition is only for the first year of the program. Using Xcel's assumptions, increased enrollment in future years can be expected to enhance the benefits that the program can deliver. There may also be slight decrease in costs due to one-time technology costs (approximately 4 percent of the 2026 budget) that will no longer be necessary after the first year of the program.¹³

An opt-out program would help maximize the benefits of PTR. In Xcel's stakeholder engagement presentation, the Company notes that "an opt-out structure would maximize program size and avoid recruitment costs and time."¹⁴ While the load reduction per customer may be lower under an opt-out program, the opt-out structure can cast a wider net and enroll significantly higher numbers of customers, potentially leading to greater aggregate load reductions. For example, Portland General Electric's Residential Pricing Pilot tested both the opt-in and opt-out approaches for PTR, finding that the opt-out program captured customers who would neither opt in nor opt out of a program if given the choice. The program evaluation estimated that 92 percent of participants in the opt-out program were such "complacent customers," and these customers reduced load by 6 percent during PTR events, compared to between 17 to 21 percent from opt-in customers.¹⁵ At these load reduction levels, if the opt-out program enrolls four times as many customers as the opt-in program, the opt-out program would deliver greater aggregate load savings, assuming all else equal. Nevertheless, Xcel did not propose an opt-out program, which the Company claims is "inconsistent with peer programs and likely not cost effective" because such a program would require a "sizeable investment" in the Company's billing system.¹⁶ However, Xcel provides no specifics regarding the number of participants that would trigger the need for these billing system upgrades or the potential costs of those

¹² Xcel Petition, at 16.

¹³ DOC IR 9.

¹⁴ Xcel Petition, Attachment C, at 11.

¹⁵ Cadmus. 2018. Flex Pricing and Behavioral Demand Response Pilot Program, at 9-10.

<https://edocs.puc.state.or.us/efdocs/HAH/um1708hah16432.pdf>

¹⁶ Xcel Petition, at 11.

upgrades.¹⁷ This information is necessary to assess whether an opt-out program would be beneficial to ratepayers.

Additionally, it remains unclear whether and how the capacity benefits of the program will be realized. According to Xcel's BCA, generation capacity accounts for 97% of the program's benefits under the Minnesota Test and 98% under the Ratepayer Impact Measure.¹⁸ For ratepayers to realize these benefits, Xcel must either be able to 1) bid PTR load reductions into the MISO capacity market, or 2) use PTR load reductions to lower the Company's load forecast and capacity obligations with MISO. However, both avenues appear to be infeasible at this time. First, Xcel states that it does not plan to bid the program into MISO, citing challenges posed by the unpredictability of load reductions under behavioral demand response programs like PTR, as well as changing MISO market rules for demand-side resources.¹⁹ The Department believes this approach is reasonable for the pilot phase, but should be revisited in the future once MISO market reforms for demand-side resources have concluded. Utilities in other states have bid their PTR programs into the capacity market. For example, ComEd bids its Peak Time Savings program as a Demand Response Resource in PJM's capacity markets to fund bill credits for program participants.²⁰ Similarly, Baltimore Gas & Electric's PTR program is also monetized in PJM.²¹

Second, MISO rules appear to preclude using load reductions from demand-side resources (other than energy efficiency) to reduce load serving entities' load forecasts.²² Specifically, MISO's Resource Adequacy tariff states that load serving entities' Coincident Peak Demand forecasts, which are used to determine their capacity obligations, must be "augmented to include the normal Demand from forecasted demand resources, whether registered or not registered with the Transmission Provider, including Demand from any retail demand side management programs."²³ Xcel has not explained whether or how PTR load reductions will be used to lower the Company's peak demand forecast and capacity obligations with MISO, and whether this would be consistent with MISO rules.

If planning entities like MISO do not rely on PTR to reduce load during peak times, even *if* PTR participants reduce load during events, PTR load reductions will not help meet Xcel's capacity obligations and will not result in reductions in the Company's capacity costs. In other words, PTR will not influence capacity requirements if expected load reductions are not planned for and relied upon as

¹⁷ See DOC IR 4.

¹⁸ Using data from Xcel Petition, Attachment D.

¹⁹ DOC IR 7; DOC IR 21.

²⁰ Resource Innovations. 2024. Commonwealth Edison Company's Peak Time Savings Program Annual Report, p. 27. <https://icc.illinois.gov/docket/P2012-0484/documents/354730/files/621367.pdf>

²¹ Baltimore Gas & Electric. Rider 26 – Peak Time Rebate. https://assets.contentstack.com/v3/assets/blt71bfe6e8a1c2d265/bltbc53d4782e3ba22/Rdrs_26_27.pdf.

²² MISO rules define an Energy Efficiency Resource as "an end-use customer project... exceeding then-current building codes, appliance standards, or other relevant standards, designed to achieve a continuous reduction in electric energy consumption during On Peak daylight hours". PTR only reduces load during a few days each year and does not provide "a continuous reduction in electric energy consumption during On Peak daylight hours."

See MISO. 2024. FERC Electric Tariff, Module E-1, Resource Adequacy, at 61. https://docs.misoenergy.org/miso12-legalcontent/Module_E-1_-_Resource_Adequacy.pdf

²³ MISO. 2024. FERC Electric Tariff, Module E-1, Resource Adequacy, at 22. https://docs.misoenergy.org/miso12-legalcontent/Module_E-1_-_Resource_Adequacy.pdf

Analysts assigned: Andy Bahn, Rachel Wiedewitsch

a capacity resource by the system operator or if load reductions are not incorporated in Xcel's load forecast to reduce its capacity obligation.

Given this uncertainty, the focus of the initial implementation of the PTR should be on gathering the necessary data to inform future program design, particularly the potential for an opt-out program that is MISO-integrated. The Department recommends that PTR be first implemented as a pilot to collect data to help determine whether PTR should be implemented as an opt-in or opt-out program in the long term. In particular, the pilot should be designed to test customer acceptance and load reductions under both opt-in and opt-out enrollment approaches. In addition to Xcel's existing plans to invite current EAD participants to opt in to PTR, the Company should also auto-enroll some of these customers in PTR. For example, the Company could auto-enroll 7,750 customers, which is equivalent to half of the expected PTR enrollment, and allow opt-in customers to fill up the rest of the program. The Company should then collect data on customer acceptance and load reductions from each group separately to enable a comparison between opt-in and opt-out customers, similar to Portland General Electric's pilot described above.

Upon completion of the PTR Pilot, the Company should file a proposal in ECO for a full PTR program based on the results of the pilot. The proposal should include BCAs for both an opt-in and an opt-out program using enrollment and load reduction data from the pilot, and Xcel should provide justification for its recommended approach for the program. The BCA for the opt-out program should include the costs for any necessary billing system upgrades.

The Department recommends that the PTR pilot be implemented in parallel with the existing EAD program, with customers allowed to enroll in either PTR or EAD. As the Company gains more experience with and information from PTR, the program could be expanded to replace EAD in the future. However, EAD should not be discontinued at this time, in case PTR is determined to be not cost-effective after the initial pilot.

B.2. Are Xcel's proposed eligibility rules reasonable, including the proposal to exclude current demand response program participants?

The Department believes it is reasonable to exclude customers currently enrolled in other demand response programs, such as AC Rewards and Saver's Switch. These restrictions ensure that customers do not receive duplicative incentives from different programs for the same load reduction. The Department's interpretation of these eligibility requirements is that they would not exclude current demand response customers from switching programs—for example, from AC Rewards to PTR. Similarly, the Department also recommends that customers be allowed to enroll in either the PTR pilot or EAD, as discussed above.

It is also reasonable to exclude net metering customers at this time, since baseline and load reduction measurements for these customers would be complicated by distributed generation. Specifically, it would be difficult to determine whether load reductions are a result of the customer's behavior or of higher solar production than usual. However, the Company should consider net metering customers as a potential future addition to the program. Some PTR programs offered by other utilities around the

country do allow net metering customers to participate, and load reductions from these customers would provide benefits to ratepayers.²⁴

B.3. Is the Company’s proposed budget reasonable, including third-party vendor expenses?

Since the RFP to select a vendor for PTR is ongoing, Xcel’s program cost estimates are based on the EAD program.²⁵ Third-party vendor expenditures comprise 70 percent of the budget, compared to 16 percent for rebates to customers.²⁶ The Department believes this is a reasonable approach until PTR-specific costs are identified through the RFP. Since vendor and administration costs do not grow in line with increased enrollment, the Department expects that these costs will account for a smaller share of total program costs in subsequent years.²⁷

B.4. Is the Company’s proposed customer outreach and communications plan reasonable?

The Department agrees that targeting current EAD participants is a reasonable approach for the early stages of PTR implementation, given that the Company already has these customers’ contact information. As discussed above, the Department recommends that Xcel also auto-enroll a subset of these customers in PTR, in addition to inviting customers to opt in as proposed by the Company.

B.5. Is the Company’s cost-effectiveness assessment reasonable?

The Company’s cost-effectiveness analysis utilizes a standard methodology approved by the Commission to assess the relationship between benefits and costs of the proposed PTR program. However, the BCA results are speculative and should be treated as such. The primary issue, as discussed above, is that the generation capacity benefits claimed by Xcel, which account for almost all of the program’s benefits, are unlikely to result in realized savings for ratepayers without Xcel bidding PTR load reductions into the MISO capacity market or using PTR to reduce the Company’s load forecast.

Aside from the uncertainty around capacity benefits, enrollment figures and customer peak load reduction estimates are key assumptions driving the estimated benefits of the program that may differ from actuals during program implementation. Notably, Xcel’s peak load reduction estimate of 0.63 kW per customer is substantially higher than the load reductions observed under any other PTR programs the Department reviewed.

Table 2. Average load reduction per customer under PTR programs

Program	Average Load Reduction per Customer (kW)
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²⁴ See Xcel Petition, Attachment B. The Power Saver Rewards program offered by California utilities (PG&E, SDG&E, and SCE) explicitly allows solar customers to participate, while other programs do not specify exclusion of net metering customers.

²⁵ Xcel Petition, at 14.

²⁶ Xcel Petition, at 14, Table 1.

²⁷ DOC IR 9.

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Commonwealth Edison – Peak Time Savings ²⁸	0.04 (2023) 0.11 (2022)
Consumers Energy – Peak Time Rewards ²⁹	0.24
Portland General Electric – Peak Time Rebate ³⁰	0.13-0.22 (winter) 0.39-0.41 (summer)
Baltimore Gas & Electric – Peak Time Rebate ³¹	0.15

Since the benefits of PTR, particularly generation capacity, scale directly with customers' peak load reduction under the program, lower load reductions will also decrease the benefits of the program accordingly. An adjustment of the load reduction estimates to be more in line with the programs listed above would result in the program no longer passing the Minnesota Test.

Furthermore, although emissions benefits only account for a small portion of the total benefits of the program, these benefits also appear to be overstated. Xcel's BCA only examines load reductions during an event, but does not consider potential load shifting from customers that may result in increased load during other hours.³² For example, some customers may pre-cool their homes and then turn up their thermostat after the event, potentially increasing load right before and after the event hours. Incorporating the effects of load shifting significantly impacts estimates of environmental benefits. The effect of load shifting on emissions can be seen through examination of hourly carbon intensity around peak load hours. Since 2020, peak load occurred from June to August between 4 and 6 pm.³³ The figures below use hourly emissions intensity data from 2024 (the only full year available) to examine emissions intensities around peak hours during July, and around the actual peak that year, which occurred on August 26th.

[TRADE SECRET DATA HAS BEEN EXCISED]

[TRADE SECRET DATA HAS BEEN EXCISED]

The figures show that if a PTR event had occurred in July 2024 and a customer shifted their load to just after the event window, emissions would have likely *increased*. During the actual peak **[TRADE SECRET DATA HAS BEEN EXCISED]** there would have been a slight emissions reduction if a customer shifted load to after the event, but nowhere near an estimate that assumes all load is curtailed permanently in the peak load hour(s).

²⁸ Resource Innovations. 2024. Commonwealth Edison Company's Peak Time Savings Program Annual Report, at 26. <https://icc.illinois.gov/docket/P2012-0484/documents/354730/files/621367.pdf>

²⁹ Cadmus. 2021. Dynamic Peak Pricing Annual Evaluation Report – 2020 Program Year, at 11, Table 7. <https://mi-psc.my.site.com/sfc/servlet.shepherd/version/download/068t000000OpNv6AAF>

³⁰ Cadmus. 2018. Flex Pricing and Behavioral Demand Response Pilot Program, at 39, Table 14. <https://edocs.puc.state.or.us/efdocs/HAH/um1708hah16432.pdf>

³¹ Using data from BGE Response to OPC Data Request 1-11, filed August 25, 2025, in Maryland Public Service Commission Case No. 9761.

³² Xcel Petition, Attachment D.

³³ DOC-024-PUBLIC.

Analysts assigned: Andy Bahn, Rachel Wiedewitsch

Even though PTR may provide lower benefits than estimated in Xcel's BCA, the Department believes the program has potential to deliver much greater benefits in the future, particularly under an opt-out structure. When Xcel files its proposal for a full PTR program, a refined BCA with updated assumptions based on actual data collected during the pilot will assist the Commission with a more robust evaluation of the benefits and costs of PTR.

B.6. Should the Commission consider recent increases in the Midcontinent Independent System Operator (MISO) capacity auction clearing prices when assessing the cost-effectiveness assessment?

To calculate generation capacity benefits under the BCA, Xcel used the MISO Cost of New Entry (CONE) for 2023/2024, which is \$104.17/kW-year.³⁴ For comparison, MISO's most recent Planning Resource Auction resulted in a clearing price for summer 2025 capacity of \$666.50/MW-day, which is equivalent to \$243.27/kW-year.³⁵ This figure is higher than Xcel's BCA assumption and is much higher than summer capacity prices in previous years. It is uncertain whether capacity prices for summer 2026 (when PTR will be in place) will continue at the same elevated level or not.³⁶

However, the Department does not believe it is necessary to consider the increase in MISO capacity costs, given that this point is moot if Xcel does not bid PTR load reductions into MISO or use PTR load reductions to decrease the Company's capacity obligations. Without registering PTR with MISO or reducing Xcel's capacity obligations, any load reductions under the program in 2026 will not deliver any generation capacity cost savings to ratepayers. When Xcel files its proposal for a full PTR program after the pilot period, as recommended above, the Company will have additional data from future Planning Resource Auctions to inform its BCA calculations as well as more clarity on whether PTR load reductions can be bid into MISO or used to reduce Xcel's capacity obligation.

B.7. Should the Commission require any modifications to the program to increase the scale and/or equity of system benefits that can be delivered?

Since the system benefits of peak load reductions, if realized through MISO processes, accrue to all ratepayers rather than to localized areas, the Department does not believe there are program modifications that can increase the equity of those system benefits. Since electric rates are regressive, with electricity bills comprising a greater share of household expenses for low-income customers, any downward pressure on rates resulting from avoided capacity costs would benefit low-income households more than higher-income households.³⁷

³⁴ DOC IR 12; Xcel's January 29, 2024, Compliance Filing, CIP-23-92, Appendix 1, at 518.

<https://www.edockets.state.mn.us/documents/%7B70D55A8D-0000-CF23-95CF-EA8B427927FD%7D/download?contentSequence=0&rowIndex=67>

³⁵ MISO. 2025. MISO's Planning Resource Auction indicates sufficient resources. <https://www.misoenergy.org/meet-miso/media-center/2025---news-releases/misos-planning-resource-auction-indicates-sufficient-resources/>

³⁶ MISO. 2024. Planning Resource Auction Results for Planning Year 2024-2026, at 25. <https://cdn.misoenergy.org/2024%20PRA%20Results%20Posting%2020240425632665.pdf>

³⁷ Low-income and African American households experience higher energy burdens (the percentage of income spent on energy) than other households. See:

RMI. 2023. 1 in 7 Families Live in Energy Poverty. States Can Ease That Burden. <https://rmi.org/1-in-7-families-live-in-energy-poverty-states-can-ease-that-burden/>

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To increase the scale of system benefits delivered by PTR, the Commission should direct Xcel to explore an opt-out structure in parallel with opt-in enrollment for the pilot, as recommended above, and consider an opt-out program for future program implementation. Additionally, Xcel should target customers with high peak load for enrollment in PTR. For ComEd's PTR program in Illinois, the utility conducted targeted marketing at customers whose peak load contribution (PLC) were in the top quartile of all customers, and found that high PLC participants had significantly greater load reductions during PTR events than non-high PLC participants (0.23 kW compared to 0.14 kW).³⁸ The Commission should require Xcel to follow the same approach for its PTR pilot and collect data on these customers to inform future program implementation.

Aside from system benefits, PTR can also deliver benefits to program participants by providing them with the opportunity to reduce their electric bills by reducing load during PTR events. Since under PTR customers can only earn rewards for reducing load, rather than being penalized for not reducing load, Xcel should target low-income households and communities to ensure that these customers can benefit directly from participating in the program, including through outreach and market as well as auto-enrollment.

B.8. Are there program design, implementation, and evaluation elements that have proven successful in similar programs, such as Connexus's Peak Time Rebate program, that the Commission should direct Xcel to incorporate?

The Department discussed program design, implementation, and evaluation elements from other PTR programs in responses to previous questions.

B.9. What reporting should the Commission require the Company to provide, and on what cadence?

Xcel plans to track and report participants, rebates paid, and energy saved as part of the annual status report for its ECO plan.³⁹ Since PTR would be part of the Company's ECO portfolio, the Department agrees that PTR should be part of the annual ECO status report. To ensure that the PTR pilot provides useful data to inform future program design and implementation, the Department recommends additional reporting requirements for PTR, consistent with the discussion above:

- Enrollment rates for opt-in customers
- Participation, rebates paid, and peak load reduction for opt-in and opt-out customers
- Customer acquisition costs for opt-in and opt-out customers
- Customer satisfaction for opt-in and opt-out customers
- Participation, rebates paid, and peak load reduction for high PLC customers and non-high PLC customers

George C. Homsy & Ki Eun Kang. 2025. Energy burden: Exploring the intersection of race, income, and community characteristics across the United States. Energy Research & Social Science, Volume 127.

<https://www.sciencedirect.com/science/article/abs/pii/S2214629625002889>

³⁸ Resource Innovations. 2024. Commonwealth Edison Company's Peak Time Savings Program Annual Report, at 40.

<https://icc.illinois.gov/docket/P2012-0484/documents/354730/files/621367.pdf>

³⁹ DOC IR 3.

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- Participation, rebates paid, and peak load reduction for low-income customers and non-low-income customers
- Timing of PTR events compared to timing of actual system peaks.

B.10. Should the Commission require an assessment of the program's performance and scaling opportunities after a certain duration?

Yes. As discussed above, the Commission should require Xcel to file a proposal for full PTR program implementation as part of the Company's ECO portfolio, using data from the pilot. The proposal should specify how Xcel will utilize PTR load reductions to reduce capacity costs and include BCAs for both an opt-in and an opt-out program.

B.11. What method of cost recovery is allowable and appropriate for program costs, if approved? For example, should the Commission authorize the Company to seek future cost recovery through Xcel's ECO Portfolio, or direct the Company to use an alternate cost recovery method?

Cost recovery for PTR should be through the Company's ECO portfolio. Minn. Stat. § 216B.241, subd. 13(a) provides enabling language for load management programs to be included in the ECO portfolio.⁴⁰ The PTR program meets the statutory definition for load management under § 216B.2402, subd. 15, which defines load management as "an activity, service, or technology that changes the timing or the efficiency of a customer's use of energy that allows a utility or a customer to: (1) respond to local and regional energy system conditions; or (2) reduce peak demand for electricity or natural gas."⁴¹

Including PTR in ECO would put the program under the same regulatory umbrella as Xcel's other load management programs. The ECO framework also includes annual reporting requirements that provides for regular review by the Department and stakeholders, as well as provides predictable cost recovery for Xcel.

B.12. Is there direction the Commission could provide to Xcel regarding other programs, whether existing or future, that may qualify for ECO and require substantive Commission review and/or tariff?

Under Minnesota statute, tariff or rate changes are the Commission's jurisdiction.⁴² Therefore, if the utility reasonably anticipates that the proposal will result in a tariff or rate change, then the petition will have to go to the Commission for approval either before or after ECO review. The Commission should instruct Xcel to seek any necessary Commission approval prior to filing proposals under ECO.

B.13. Are there other issues or concerns related to this matter?

The Department has no other issues or concerns related to this matter at this time.

⁴⁰ [Minn. Stat. § 216B.241.](#)

⁴¹ [Minn. Stat. § 216B.2402.](#)

⁴² [Minn. Stat. § 216B.16.](#)

IV. DEPARTMENT RECOMMENDATIONS

Based on analysis of Xcel's PTR proposal, the Department has prepared recommendations, which are provided below. The recommendations correspond to the subheadings of Section III above.

B. QUESTIONS TO BE ANSWERED

- B.1. The Department recommends that PTR be implemented as a pilot, in parallel with EAD. The pilot should pursue both opt-in and opt-out approaches to customer enrollment and collect data on opt-in and opt-out customers separately.
- B.1. The Department recommends that Xcel include a proposal for a full PTR program as part of the Company's ECO portfolio upon completion of the pilot. The proposal should:
 - Include BCAs for both an opt-in and opt-out program, informed by the data collected as part of the pilot
 - Include the costs of necessary billing system upgrades to support an opt-out program
 - Specify how Xcel will bid PTR load reductions into MISO markets or reduce the Company's capacity obligations.
- B.6. The Department recommends that Xcel utilize updated capacity prices as part of its full PTR program proposal.
- B.7. The Department recommends that Xcel target low-income customers and customers with high peak load contribution for program enrollment.
- B.9. The Department recommends that reporting for PTR be part of the Company's annual ECO status reports and that Xcel collect the following additional information from the PTR pilot to inform future program design and implementation:
 - Enrollment rates for opt-in customers
 - Participation, rebates paid, and peak load reduction for opt-in and opt-out customers
 - Customer acquisition costs for opt-in and opt-out customers
 - Customer satisfaction for opt-in and opt-out customers
 - Participation, rebates paid, and peak load reduction for high PLC customers and non-high PLC customers
 - Participation, rebates paid, and peak load reduction for low-income customers and non-low-income customers
 - Timing of PTR events compared to timing of actual system peaks.
- B.11. The Department recommends that PTR costs be recovered through Xcel's ECO portfolio.
- B.12. The Department recommends that the Commission instruct Xcel to seek Commission approval for proposals that will result in a tariff or rate change prior to filing proposals under ECO.

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Xcel Energy	Information Request No.	3
Docket No.:	E002/M-24-432	
Response To:	Minnesota Department of Commerce	
Requestor:	Peter Teigland, Andy Bahn, Rachel Wiedewitsch	
Date Received:	July 28, 2025	

Question:

Topic: Xcel's proposed PTR program

Reference(s): PTR Program Petition

What metrics will Xcel track to help assess the success of the program?

Response:

The Company proposed to include the PTR program as part of our Energy Conservation and Optimization (ECO) plan. As part of our ECO portfolio, we anticipate tracking participants, rebates paid, and energy saved as part of the annual status report filed on April 1 of each year. Our 2024 Annual Status Report was filed in Docket G,E002/CIP-23-92.

Preparer:	Kris Kohls
Title:	Regulatory Policy Specialist
Department:	Customer Energy & Transportation Solutions
Telephone:	612-216-8124
Date:	August 8, 2025

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- ☒ Public Document

Xcel Energy

Information Request No.

4

Docket No.: E002/M-24-432

Response To: Minnesota Department of Commerce

Requestor: Peter Teigland, Andy Bahn, Rachel Wiedewitsch

Date Received: July 28, 2025

Question:

Topic: Xcel's proposed PTR program

Reference(s): PTR Program Petition

Refer to Xcel's PTR Application, p. 11, which states "The Company considered an opt-out approach for the PTR program, specifically starting with eligible customers currently enrolled in Energy Action Days. However, it was determined that this approach was inconsistent with peer programs and likely not cost effective. Given the volume of customers eligible for rebates, a multi-year project with a sizeable investment in our billing system would be required to support the same number of participants as Energy Action Days. The Company proposes assessing results from an established opt-in program prior to initiating an investment on that scale."

- a. How many PTR participants can Xcel accommodate before investments in the billing system become necessary?
- b. Did the Company evaluate the cost effectiveness of an opt-out approach? If yes, please provide these results in separate workpapers. If not, then please explain why not.
- c. Concerning the cost effectiveness of an opt-out approach, given the need for upfront investment in a new billing system presumably affecting initial cost-effectiveness results, could the opt-out program become cost effective over a long enough time horizon? Please explain.
- d. Is the Company aware of any peer programs that do utilize an opt-out approach? If so, has the Company evaluated the viability of this approach for its own customers?
- e. Has the relatively low response rate to Energy Action Days influenced the Company's decision not to pursue an opt-out approach for the proposed PTR program? If so, then please explain to what extent and how the Company has evaluated other potential design issues with EAD (e.g, the lack of incentive payments) that might be affecting the overall response rate.
- f. Please describe specifically how the Company plans to assess the results from its proposed opt-in program to determine whether to deploy PTR on an opt-

out basis. When would this determination be made and what would the decision criteria be?

Response:

- a. There isn't a specific threshold our system can accommodate. The current process to apply rebates to a customer's bill is manual and time intensive, which increases the potential for errors and inefficiencies. With growing PTR enrollments, the demand on processing resources will rise, further elevating the risk of inaccuracies and delays.
- b. No, the Company did not evaluate the cost effectiveness of an opt-out approach given the cost necessary to modify our billing system and manage opt-out customer engagement. It was also apparent from our research that opt-out scenarios were not typically utilized in the industry as shown in Attachment B of our Petition filed in the above referenced docket on March 17, 2025.
- c. See response to subpart b.
- d. As noted in Attachment B of our Petition filed on March 17, 2025, only a few peer programs utilize an opt-out approach. The Company selected an opt-in model, which aligns with most of the peer utility programs and reflects common industry practice. Additionally, as noted in the Petition, the Company did evaluate the viability of an opt-out approach and determined it is not feasible to implement in our current billing system.
- e. No, the Energy Action Days (EAD) response rate was not considered in planning this program design.
- f. The primary factor in determining whether the Company can implement PTR on an opt-out basis will be the feasibility of doing so within our billing system. Until such functionality becomes technically viable, an out-out approach remains impractical.

Preparer:	Kris Kohls
Title:	Regulatory Policy Specialist
Department:	Customer Energy & Transportation Solutions
Telephone:	612-216-8124
Date:	August 8, 2025

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Xcel Energy

Information Request No.

7

Docket No.: E002/M-24-432

Response To: Minnesota Department of Commerce

Requestor: Peter Teigland, Andy Bahn, Rachel Wiedewitsch

Date Received: July 28, 2025

Question:

Topic: Xcel's proposed PTR program

Reference(s): PTR Program Petition

Refer to Xcel's PTR Application, p. 13, which states "PTR will not be registered with MISO."

- a. Please explain why Xcel will not bid the load reductions from PTR into MISO markets.
- b. Does Xcel plan to register PTR with MISO and bid PTR load reductions into MISO markets in the future? Explain why or why not.

Response:

PTR is a behavioral demand response (BDR) program that has the following characteristics:

1. **Voluntary participation:** The programs are dependent upon individuals choosing to respond.
2. **Inconsistent Behavior:** Customers will respond widely based on time of day, weather, personal schedules and awareness of an event.
3. **Limited Impact:** Behavioral change often results in small incremental reduction in energy use.
4. **Measurement challenges:** It can be difficult to measure and verify the impact of behavioral programs, and these measurements need to be tested overtime within a program.

As a result, these reductions are significantly variable and need to be tested over time.

- a. Given the characteristics listed above, the Company's current BDR program, Energy Action Days, is not bid into MISO. Additionally, MISO is in the process of adjusting their future requirements for demand response resources. As part of these changes, there will be specific requirements put in place to

deploy resources faster and creating significant penalties for missing load requirements. These changes are not conducive to BDR programs being developed or piloted. Without reliability, there is a significant risk of being penalized.

- b. Without several years of measurement and verification on BDR programs, it is unknown whether the Company will choose to utilize this as a future MISO resource.

Preparer: Annie Dellva
Title: Senior Manager, Market Operations
Department: Commercial Operations
Telephone: 720-560-1425
Date: August 8, 2025

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Xcel Energy

Information Request No.

9

Docket No.: E002/M-24-432

Response To: Minnesota Department of Commerce

Requestor: Peter Teigland, Andy Bahn, Rachel Wiedewitsch

Date Received: July 28, 2025

Question:

Topic: Xcel's proposed PTR program

Reference(s): PTR Program Petition

Refer to Xcel's PTR Application, p. 14, Table 1. Please clarify the proportions of program startup costs versus annual ongoing costs included in the vendor, technology services, and administration budgets.

Response:

The costs associated with technology services are primarily related to program startup. The Company anticipates that vendor implementation and administration expenses will remain relatively stable in subsequent years. However, rebate costs are expected to grow in line with increased customer participation.

Preparer:	Kris Kohls
Title:	Regulatory Policy Specialist
Department:	Customer Energy & Transportation Solutions
Telephone:	612-216-8124
Date:	August 8, 2025

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Xcel Energy Information Request No. 12
Docket No.: E002/M-24-432
Response To: Minnesota Department of Commerce
Requestor: Peter Teigland, Andy Bahn, Rachel Wiedewitsch
Date Received: July 28, 2025

Question:

Topic: Xcel's proposed PTR program

Reference(s): PTR Program Petition

Refer to Xcel's PTR Application, Attachment D.

- a. Please clarify whether the estimated Generation Capacity benefits per kW are calculated based on the costs of capacity procured through the MISO capacity market or through other sources (e.g., bilateral agreements, Xcel-owned generation resources).
- b. Please provide all documentation supporting the calculation of the estimated per-kW generation capacity benefits in live Excel format with all formulas intact.

Response:

- a. As per the Deputy Commissioners Decision filed on March 31, 2023 in Docket No. E,G999/CIP-23-46, the Company used the MISO CONE for 2023/2024 as the basis of the Generation Capacity benefits.
- b. Please refer to Appendix 1 and Attachment A of the Company's compliance filing on January 29, 2024 in Docket No. G,E002/CIP-23-92 for these calculations.

Preparer: Karl Shlanta
Title: DSM Technical Policy Specialist
Department: Customer Energy & Transportation Solutions
Telephone: 612-216-8127
Date: August 8, 2025

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Xcel Energy	Information Request No.	21
Docket No.:	E002/M-24-432	
Response To:	Minnesota Department of Commerce	
Requestor:	Peter Teigland, Andy Bahn, Rachel Wiedewitsch	
Date Received:	July 29, 2025	

Question:

Reference(s): PTR Program Petition

Refer to Xcel's PTR Application, p. 9, which states "Updates to the Midcontinent Independent System Operator (MISO) market rules may make it more difficult to utilize a PTR program because of unpredictability of load response."

1. Please provide these updates, as well as the current MISO policy for accepting capacity bids from demand response and PTR programs.
2. If Xcel bid all capacity of its PTR program into the MISO market, please explain any adjustments MISO would make to the bid and provide expected revenues based on the most recent MISO capacity auction prices.

Response:

1. MISO has submitted a series of reforms in 2025 that address concerns around the current framework for demand-side resources in the MISO market. Please see FERC Docket Nos. ER25-2845, ER25-1886, ER25-2050, and ER25-1729. These filings discuss both current and proposed changes to rules regarding demand response programs in MISO. MISO intends to submit a fifth filing later this year that will address Load Modifying Resource (LMR) replacements, test deferrals, and non-performance penalties.
2. If the capacity from the PTR program qualified as a capacity resource under the MISO tariff, the Company would utilize the PTR capacity resource in the same manner as any other Company capacity resource to meet its Planning Resource Margin Requirements. Any PTR capacity resources that cleared the MISO annual Planning Resource Auction would receive the seasonal Auction Clearing Price for the applicable season.

Preparer: Annie Dellva
Title: Senior Manager, Market Operations

Department: Commercial Operations

Telephone: 720-560-1425

Date: August 8, 2025

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Xcel Energy Information Request No. 24
Docket No.: E002/M-24-432
Response To: Minnesota Department of Commerce
Requestor: Peter Teigland, Andy Bahn, Rachel Wiedewitsch
Date Received: July 29, 2025

Question:

Topic: Xcel's proposed PTR program

Reference(s): PTR Program Petition

In Excel format, please provide hourly emissions rates for each hour from 2020-2024. In each year, please identify the peak hour (date and time). If this data is not available, please provide all information available related to hourly emissions rates and peak load date and time from 2020-2024.

Response:

The hourly data from January 2024 through June 2025 is provided as Attachment A. These are estimates based on the actual generation MWh for each plant applied to an average historical rate of emissions for each plant. This data is not available for 2020-2023.

The actual peak load dates and times from 2020-2024 are available on page 401b of the NSP-Minnesota annual FERC Form 1 for the years 2020-2024 and referenced in the chart below:

Peak Load Date and Time

Year	Date	Hour	Peak Load
2020	July 8	1700	7,215
2021	July 27	1800	7,548
2022	June 20	1700	7,882
2023	August 23	1600	7,806
2024	August 26	1700	7,444

Attachment A is marked "Not-Public" in its entirety as it comprises information the Company considers to be trade secret data as defined by Minn. Stat. § 13.37(1)(b). The information contains confidential data that derives an independent economic

value from not being generally known or readily ascertainable by others who could obtain economic value or a financial advantage from its disclosure or use. The Company takes efforts to protect this information from public disclosure. Thus, Xcel Energy excises this information as protected data pursuant to Minn. Rule 7829.0500.

1. **Nature of the Material:** Hourly Historical Data
2. **Author(s):** Jeremy Petersen
3. **Importance:** Contains not-public, proprietary information.
4. **Date the Information was Prepared:** August 6, 2025

Preparer:	Jeremy Petersen
Title:	Regulatory Policy Specialist
Department:	Customer Energy & Transportation Solutions
Telephone:	612-330-7934
Date:	August 8, 2025

CERTIFICATE OF SERVICE

I, Sharon Ferguson, hereby certify that I have this day, served copies of the following document on the attached list of persons by electronic filing, certified mail, e-mail, or by depositing a true and correct copy thereof properly enveloped with postage paid in the United States Mail at St. Paul, Minnesota.

Minnesota Department of Commerce
Public Comments

Docket No. E002/M-24-432

Dated this 5th day of **September 2025**

/s/Sharon Ferguson

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
14	Thomas	Ashley	tom@greenlots.com	Greenlots		null null, null United States	Electronic Service		No	Official 24-432
15	Donna	Attanasio	dattanasio@gwu.edu	George Washington University		2000 H Street NW Washington DC, 20052 United States	Electronic Service		No	Official 24-432
16	Kevin	Auerbacher	kauerbacher@tesla.com	Tesla, Inc.		1050 K Street NW, Suite 101 Washington DC, 20001 United States	Electronic Service		No	Official 24-432
17	John	Bailey	bailey@ilsr.org	Institute For Local Self-Reliance		1313 5th St SE Ste 303 Minneapolis MN, 55414 United States	Electronic Service		No	Official 24-432
18	Anjali	Bains	bains@fresh-energy.org	Fresh Energy		408 Saint Peter Ste 220 Saint Paul MN, 55102 United States	Electronic Service		No	Official 24-432
19	Mark	Bakk	mbakk@lcp.coop	Lake Country Power		26039 Bear Ridge Drive Cohasset MN, 55721 United States	Electronic Service		No	Official 24-432
20	Gail	Baranko	gail.baranko@xcelenergy.com	Xcel Energy		414 Nicollet Mall 7th Floor Minneapolis MN, 55401 United States	Electronic Service		No	Official 24-432
21	Max	Baumhefner	mbaumhefner@nrdc.org	Natural Resources Defense Council		111 Sutter St 21st Fl San Francisco CA, 94104 United States	Electronic Service		No	Official 24-432
22	Jessica L	Bayles	jessica.bayles@stoel.com	Stoel Rives LLP		1150 18th St NW Ste 325 Washington DC, 20036 United States	Electronic Service		No	Official 24-432
23	Mathias	Bell	mathias@weavegrid.com	WeaveGrid		375 Alabama Street, Suite 325 San Francisco CA, 94110 United States	Electronic Service		No	Official 24-432
24	David	Bender	dbender@earthjustice.org	Earthjustice		1001 G Street NW Suite 1000 Washington DC, 20001 United States	Electronic Service		No	Official 24-432
25	Derek	Bertsch	derek.bertsch@mrenergy.com	Missouri River Energy Services		3724 West Avera Drive PO Box 88920 Sioux Falls SD, 57109-8920 United States	Electronic Service		No	Official 24-432
26	Laura	Bishop	laura.bishop@state.mn.us		Minnesota Pollution Control Agency	520 Lafayette Rd Saint Paul MN, 55155 United States	Electronic Service		No	Official 24-432
27	Ingrid	Bjorklund	ingrid@bjorklundlaw.com	Bjorklund Law, PLLC		855 Village Center Drive #256 North Oaks MN, 55127 United States	Electronic Service		No	Official 24-432
28	William	Black	bblack@mmua.org	MMUA		Suite 200 3131	Electronic Service		No	Official 24-432

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						Fernbrook Lane North Plymouth MN, 55447 United States				
29	Zoe	Bourgerie	zoe.bourgerie@minneapolismn.gov	Minneapolis City of Lakes		350 S 5th St Rm 307 Minneapolis MN, 55415 United States	Electronic Service		No	Official 24-432
30	Kenneth	Bradley	kbradley@environmentminnesota.org			2837 Emerson Ave S Apt CW112 Minneapolis MN, 55408 United States	Electronic Service		No	Official 24-432
31	Elizabeth	Brama	ebrama@taftlaw.com	Taft Stettinius & Hollister LLP		2200 IDS Center 80 South 8th Street Minneapolis MN, 55402 United States	Electronic Service		No	Official 24-432
32	Jon	Brekke	jbrekke@grenergy.com	Great River Energy		12300 Elm Creek Boulevard Maple Grove MN, 55369-4718 United States	Electronic Service		No	Official 24-432
33	Sydney R.	Briggs	sbriggs@swce.coop	Steele-Waseca Cooperative Electric		2411 W. Bridge St PO Box 485 Owatonna MN, 55060-0485 United States	Electronic Service		No	Official 24-432
34	Mark B.	Bring	mbring@otpc.com	Otter Tail Power Company		215 South Cascade Street PO Box 496 Fergus Falls MN, 56538-0496 United States	Electronic Service		No	Official 24-432
35	Matthew	Brodin	mbrodin@allete.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	Official 24-432
36	Janet	Brown	jab5100@gmail.com	Sabathani Community Center (Sabathani/SCC)		310 E 38th St Ste 200 Minneapolis MN, 55409 United States	Electronic Service		No	Official 24-432
37	Christina	Brusven	cbrusven@fredlaw.com	Fredrikson Byron		60 S 6th St Ste 1500 Minneapolis MN, 55402-4400 United States	Electronic Service		No	Official 24-432
38	Mike	Bull	mike.bull@state.mn.us		Public Utilities Commission	121 7th Place East, Suite 350 St. Paul MN, 55101 United States	Electronic Service		Yes	Official 24-432
39	James	Canaday	james.canaday@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	Suite 1400 445 Minnesota St. St. Paul MN, 55101 United States	Electronic Service		Yes	Official 24-432
40	Thomas	Carlson	thomas.carlson@edf-re.com	EDF Renewable Energy		10 2nd St NE Ste. 400 Minneapolis	Electronic Service		No	Official 24-432

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						MN, 55413 United States				
41	Douglas M.	Carnival	dcarnival@carnivalberns.com	McGrann Shea Carnival Straughn & Lamb		800 Nicollet Mall Ste 2600 Minneapolis MN, 55402- 7035 United States	Electronic Service		No	Official 24-432
42	Gabriel	Chan	gabechan@umn.edu			130 Hubert H. Humphrey Center 301 19th Ave S Minneapolis MN, 55455 United States	Electronic Service		No	Official 24-432
43	Cody	Chilson	cchilson@greatermngas.com	Greater Minnesota Gas, Inc. & Greater MN Transmission, LLC		1900 Cardinal Ln PO Box 798 Faribault MN, 55021 United States	Electronic Service		No	Official 24-432
44	Ray	Choquette	rchoquette@agp.com	Ag Processing Inc.		12700 West Dodge Road PO Box 2047 Omaha NE, 68103-2047 United States	Electronic Service		No	Official 24-432
45	John	Coffman	john@johncoffman.net	AARP		871 Tuxedo Blvd. St. Louis MO, 63119-2044 United States	Electronic Service		No	Official 24-432
46	Kenneth A.	Colburn	kcolburn@symbioticstrategies.com	Symbiotic Strategies, LLC		26 Winton Road Meredith NH, 32535413 United States	Electronic Service		No	Official 24-432
47	Brent	Coleman	bkc@dvclaw.com	Electrify America, LLC		1750 SW Harbor Way Suite 450 Portland OR, 97201 United States	Electronic Service		No	Official 24-432
48	Generic	Commerce Attorneys	commerce.attorneys@ag.state.mn.us		Office of the Attorney General - Department of Commerce	445 Minnesota Street Suite 1400 St. Paul MN, 55101 United States	Electronic Service		Yes	Official 24-432
49	Erin	Conti	erin.conti@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	445 Minnesota Street, Suite 1400 St. Paul MN, 55101 United States	Electronic Service		Yes	Official 24-432
50	Grace	Corbin	g.corbin@mpls-synod.org	Eco-Faith Network		122 W Franklin Ave Ste 600 Minneapolis MN, 55404 United States	Electronic Service		No	Official 24-432
51	Hillary	Creurer	hcreurer@allte.com	Minnesota Power		30 W Superior St Duluth MN, 55802 United States	Electronic Service		No	Official 24-432
52	George	Crocker	gwillc@nawo.org	North American Water Office		5093 Keats Avenue Lake Elmo MN, 55042 United States	Electronic Service		No	Official 24-432
53	Leigh	Currie	lcurrie@mncenter.org	Minnesota Center for		1919 University Ave	Electronic Service		No	Official 24-432

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
				Environmental Advocacy		W Ste 515 St. Paul MN, 55104 United States				
54	Lauren	Davis	lauren.davis@atlaspolicy.com	Atlas Public Policy		515 Q Street NW Unit 2 Washington DC, 20001 United States	Electronic Service		No	Official 24-432
55	Matthew	Deal	matthew.deal@chargepoint.com	ChargePoint, Inc.		254 Hacienda Ave Campbell CA, 95008 United States	Electronic Service		No	Official 24-432
56	Timothy	DenHerder Thomas	timothy@cooperativeenergyfutures.com	Cooperative Energy Futures		3500 Bloomington Ave. S Minneapolis MN, 55407 United States	Electronic Service		No	Official 24-432
57	James	Denniston	james.r.denniston@xcelenergy.com	Xcel Energy Services, Inc.		414 Nicollet Mall, 401-8 Minneapolis MN, 55401 United States	Electronic Service		No	Official 24-432
58	Carrie	Desmond	carrie.desmond@metrotransit.org	Metropolitan Council		560 6th Avenue North Minneapolis MN, 55411 United States	Electronic Service		No	Official 24-432
59	Curt	Dieren	curt.dieren@dgr.com	L&O Power Cooperative		1302 S Union St Rock Rapids IA, 51246 United States	Electronic Service		No	Official 24-432
60	Ian M.	Dobson	ian.m.dobson@xcelenergy.com	Xcel Energy		414 Nicollet Mall, 401-8 Minneapolis MN, 55401 United States	Electronic Service		No	Official 24-432
61	Bridget	Dockter	bridget.dockter@xcelenergy.com			null null, null United States	Electronic Service		No	Official 24-432
62	Richard	Dornfeld	richard.dornfeld@ag.state.mn.us		Office of the Attorney General - Department of Commerce	Minnesota Attorney General's Office 445 Minnesota Street, Suite 1800 Saint Paul MN, 55101 United States	Electronic Service		Yes	Official 24-432
63	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 United States	Electronic Service		No	Official 24-432
64	J.	Drake Hamilton	hamilton@fresh-energy.org	Fresh Energy		408 St Peter St Ste 350 Saint Paul MN, 55101 United States	Electronic Service		No	Official 24-432
65	Michelle	Dreier	mdreier@electricalassociation.com			null null, null United States	Electronic Service		No	Official 24-432
66	Christopher	Droske	christopher.droske@minneapolismn.gov	Northern States Power Company dba Xcel Energy-Elec		661 5th Ave N Minneapolis MN, 55405 United States	Electronic Service		No	Official 24-432

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
67	Brian	Edstrom	briane@cubminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota St Ste W1360 Saint Paul MN, 55101 United States	Electronic Service		No	Official 24-432
68	William	Ehrlich	wehrlich@tesla.com	Tesla, Inc.		3500 Deer Creek Rd Palo Alto CA, 94304 United States	Electronic Service		No	Official 24-432
69	Kristen	Eide Tollefson	healingsystems69@gmail.com	R-CURE		28477 N Lake Ave Frontenac MN, 55026-1044 United States	Electronic Service		No	Official 24-432
70	Rebecca	Eilers	rebecca.d.eilers@xcelenergy.com	Xcel Energy		414 Nicollet Mall - 401 7th Floor Minneapolis MN, 55401 United States	Electronic Service		No	Official 24-432
71	Bob	Eleff	bob.eleff@house.mn	Regulated Industries Cmte		100 Rev Dr Martin Luther King Jr Blvd Room 600 St. Paul MN, 55155 United States	Electronic Service		No	Official 24-432
72	Ron	Elwood	relwood@mnlsap.org	Legal Services Advocacy Project		970 Raymond Avenue Suite G-40 Saint Paul MN, 55114 United States	Electronic Service		No	Official 24-432
73	John	Farrell	jfarrell@ilsr.org	Institute for Local Self-Reliance		2720 E. 22nd St Institute for Local Self-Reliance Minneapolis MN, 55406 United States	Electronic Service		No	Official 24-432
74	Eric	Fehlhaber	efehlhaber@dakotaelectric.com	Dakota Electric Association		4300 220th St W Farmington MN, 55024 United States	Electronic Service		No	Official 24-432
75	Sharon	Ferguson	sharon.ferguson@state.mn.us		Department of Commerce	85 7th Place E Ste 280 Saint Paul MN, 55101-2198 United States	Electronic Service		No	Official 24-432
76	Mike	Fiterman	mikefiterman@libertydiversified.com	Liberty Diversified International		5600 N Highway 169 Minneapolis MN, 55428-3096 United States	Electronic Service		No	Official 24-432
77	David A.	Fitzgerald	daf@dvclaw.com	Davison Van Cleve		2321 Fairview Ave E #3 Seattle WA, 98102 United States	Electronic Service		No	Official 24-432
78	Lucas	Franco	lfranco@liunagroc.com	LIUNA		81 Little Canada Rd E Little Canada MN, 55117 United States	Electronic Service		No	Official 24-432
79	Nathan	Franzen	nathan@nationalgridrenewables.com	Geronimo Energy, LLC		8400 Normandale Lake Blvd Ste 1200 Bloomington	Electronic Service		No	Official 24-432

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						MN, 55437 United States				
80	Daryll	Fuentes	energy@usg.com	USG Corporation		550 W Adams St Chicago IL, 60661 United States	Electronic Service		No	Official 24-432
81	James	Garness	james.r.garness@xcelenergy.com			null null, null United States	Electronic Service		No	Official 24-432
82	Patti	Gartland	pgartland@greaterstcloud.com	Greater St. Cloud Development Corp.		501 West St Germain St Ste 100 St. Cloud MN, 56301 United States	Electronic Service		No	Official 24-432
83	Edward	Garvey	garveyed@aol.com	Residence		32 Lawton St Saint Paul MN, 55102 United States	Electronic Service		No	Official 24-432
84	Allen	Gleckner	gleckner@fresh-energy.org	Fresh Energy		408 St. Peter Street Ste 350 Saint Paul MN, 55102 United States	Electronic Service		No	Official 24-432
85	Allen	Gleckner	agleckner@elpc.org	Environmental Law & Policy Center		35 E. Wacker Drive, Suite 1600 Suite 1600 Chicago IL, 60601 United States	Electronic Service		No	Official 24-432
86	Jenny	Glumack	jenny@mrea.org	Minnesota Rural Electric Association		11640 73rd Ave N Maple Grove MN, 55369 United States	Electronic Service		No	Official 24-432
87	Anita	Grace	anita@gracemulticultural.com	GRACE Multictural		12959 196th LN NW Elk River MN, 55330 United States	Electronic Service		No	Official 24-432
88	Ryan	Granholm	ryan.granholm@afslaw.com	ArentFox Schiff LLP		233 S Wacker Dr. Ste. 7100 Chicago IL, 60647 United States	Electronic Service		No	Official 24-432
89	Todd J.	Guerrero	todd.guerrero@kutakrock.com	Kutak Rock LLP		Suite 1750 220 South Sixth Street Minneapolis MN, 55402-1425 United States	Electronic Service		No	Official 24-432
90	Natalie	Haberman	townsend@fresh-energy.org	Fresh Energy		408 St Peter St # 350 St. Paul MN, 55102 United States	Electronic Service		No	Official 24-432
91	Joe	Halso	joe.halso@sierraclub.org	Sierra Club		1536 Wynkoop St Ste 200 Denver CO, 80202 United States	Electronic Service		No	Official 24-432
92	Katherine	Hamilton	katherine@aem-alliance.org	Advanced Energy Management Alliance		1701 Rhode Island Ave, NW Washington DC, 20036 United States	Electronic Service		No	Official 24-432
93	Jason G.	Harp	jason.harp@afslaw.com	ArentFox Schiff LLP		233 S Wacker Dr Ste 7100	Electronic Service		No	Official 24-432

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						Chicago IL, 60606 United States				
94	Matthew B	Harris	matt.b.harris@xcelenergy.com	XCEL ENERGY		401 Nicollet Mall FL 8 Minneapolis MN, 55401 United States	Electronic Service		No	Official 24-432
95	Shubha	Harris	shubha.m.harris@xcelenergy.com	Xcel Energy		414 Nicollet Mall, 401 - FL 8 Minneapolis MN, 55401 United States	Electronic Service		No	Official 24-432
96	Erik	Hatlestad	erik@cureriver.org			117 1st St Montevideo MN, 56265 United States	Electronic Service		No	Official 24-432
97	Kim	Havey	kim.havey@minneapolismn.gov	City of Minneapolis		350 South 5th Street, Suite 315M Minneapolis MN, 55415 United States	Electronic Service		No	Official 24-432
98	Philip	Hayet	phayet@jkenn.com	J. Kennedy and Associates, Inc.		570 Colonial Park Drive Suite 305 Roswell GA, 30075-3770 United States	Electronic Service		No	Official 24-432
99	Todd	Headlee	theadlee@dvigridsolutions.com	Dominion Voltage, Inc.		701 E. Cary Street Richmond VA, 23219 United States	Electronic Service		No	Official 24-432
100	Amber	Hedlund	amber.r.hedlund@xcelenergy.com	Northern States Power Company dba Xcel Energy-Elec		414 Nicollet Mall, 401-7 Minneapolis MN, 55401 United States	Electronic Service		No	Official 24-432
101	Adam	Heinen	aheinen@dakotaelectric.com	Dakota Electric Association		4300 220th St W Farmington MN, 55024 United States	Electronic Service		No	Official 24-432
102	Annete	Henkel	mui@mnuutilityinvestors.org	Minnesota Utility Investors		413 Wacouta Street #230 St.Paul MN, 55101 United States	Electronic Service		No	Official 24-432
103	Jessy	Hennesy	jessy.hennesy@avantenergy.com	Avant Energy		220 S. Sixth St. Ste 1300 Minneapolis MN, 55402 United States	Electronic Service		No	Official 24-432
104	Sandra	Henry	sandra.henry@elevatenp.org	Elevate		322 S Green St Ste 300 Chicago IL, 60607 United States	Electronic Service		No	Official 24-432
105	Katherine	Hinderlie	katherine.hinderlie@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	445 Minnesota St Suite 1400 St. Paul MN, 55101-2134 United States	Electronic Service		Yes	Official 24-432
106	Corey	Hintz	chintz@dakotaelectric.com	Dakota Electric Association		4300 220th Street Farmington MN, 55024-9583 United States	Electronic Service		No	Official 24-432
107	Joe	Hoffman	ja.hoffman@smmpa.org	SMMPA		500 First Ave SW Rochester	Electronic Service		No	Official 24-432

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						MN, 55902-3303 United States				
108	Michael	Hoppe	lu23@ibew23.org	Local Union 23, I.B.E.W.		445 Etna Street Ste. 61 St. Paul MN, 55106 United States	Electronic Service		No	Official 24-432
109	MJ	Horner	mj.horner@xcelenergy.com			null null, null United States	Electronic Service		No	Official 24-432
110	Samantha	Houston	shouston@ucsusa.org	Union of Concerned Scientists		1825 K St. NW Ste 800 Washington DC, 20006 United States	Electronic Service		No	Official 24-432
111	Lori	Hoyum	lhoyum@mnpower.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	Official 24-432
112	Jan	Hubbard	jan.hubbard@comcast.net			7730 Mississippi Lane Brooklyn Park MN, 55444 United States	Electronic Service		No	Official 24-432
113	Holmes	Hummel	holmes.hummel@cleanenergyworks.org	Clean Energy Works		925 French St NW Washington DC, 20001 United States	Electronic Service		No	Official 24-432
114	Geoffrey	Inge	ginge@regintl.com	Regulatory Intelligence LLC		PO Box 270636 Superior CO, 80027-9998 United States	Electronic Service		No	Official 24-432
115	Casey	Jacobson	cjacobson@bepc.com	Basin Electric Power Cooperative		1717 East Interstate Avenue Bismarck ND, 58501 United States	Electronic Service		No	Official 24-432
116	Travis	Jacobson	travis.jacobson@mdu.com	Great Plains Natural Gas Company		400 N 4th St Bismarck ND, 58501 United States	Electronic Service		No	Official 24-432
117	John S.	Jaffray	jjaffray@jjrpower.com	JJR Power		350 Highway 7 Suite 236 Excelsior MN, 55331 United States	Electronic Service		No	Official 24-432
118	Alan	Jenkins	aj@jenkinsatlaw.com	Jenkins at Law		2950 Yellowtail Ave. Marathon FL, 33050 United States	Electronic Service		No	Official 24-432
119	Andrea	Jenkins	andrea.jenkins@minneapolismn.gov	Minneapolis City of Lakes		350 S 5th St Room 307 Minneapolis MN, 55415 United States	Electronic Service		No	Official 24-432
120	Richard	Johnson	rick.johnson@lawmoss.com	Moss & Barnett		150 S. 5th Street Suite 1200 Minneapolis MN, 55402 United States	Electronic Service		No	Official 24-432
121	Sarah	Johnson Phillips	sjphillips@stoel.com	Stoel Rives LLP		33 South Sixth Street Suite 4200 Minneapolis MN, 55402 United States	Electronic Service		No	Official 24-432

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
122	Nate	Jones	njones@hcpd.com	Heartland Consumers Power		PO Box 248 Madison SD, 57042 United States	Electronic Service		No	Official 24-432
123	Philip	Jones	phil@philjonesconsulting.com	Alliance for Transportation Electrification		1402 3rd Ave Ste 1315 Seattle WA, 98101 United States	Electronic Service		No	Official 24-432
124	Brendan	Jordan	bjordan@gpsid.net	Great Plains Institute & Bioeconomy Coalition of MN		2801 21st Ave S Ste 220 Minneapolis MN, 55407 United States	Electronic Service		No	Official 24-432
125	Bina	Joshi	bina.joshi@afslaw.com	ArentFox Schiff LLP		233 S Wacker Dr Ste 7100 Chicago IL, 60606 United States	Electronic Service		No	Official 24-432
126	Dan	Juhl	in.another.account.info@juhlenergy.com	Juhl Energy Inc.		1502 17th St SE Pipestone MN, 56164 United States	Paper Service		No	Official 24-432
127	Mahmoud	Kabalan	mahmoud.kabalan@stthomas.edu	University of St Thomas		2115 Summit Ave. Mail OSS100 School of Engineering Saint Paul MN, 55105 United States	Electronic Service		No	Official 24-432
128	Michael	Kampmeyer	mkampmeyer@a-e-group.com	AEG Group, LLC		260 Salem Church Road Sunfish Lake MN, 55118 United States	Electronic Service		No	Official 24-432
129	Nick	Kaneski	nick.kaneski@enbridge.com	Enbridge Energy Company, Inc.		11 East Superior St Ste 125 Duluth MN, 55802 United States	Electronic Service		No	Official 24-432
130	Stacey	Karels	skarels@local563.org	Mankato Area Bldg & Construction Trades Council		310 McKinzie St Mankato MN, 56001 United States	Electronic Service		No	Official 24-432
131	William	Kenworthy	will@votesolar.org			1 South Dearborn St Ste 2000 Chicago IL, 60603 United States	Electronic Service		No	Official 24-432
132	Samuel B.	Ketchum	sketchum@kennedy-graven.com	Kennedy & Graven, Chartered		150 S 5th St Ste 700 Minneapolis MN, 55402 United States	Electronic Service		No	Official 24-432
133	Chris	King	chris_king@siemens.com	Siemens		4000 E. Third Ave Suite 400 Foster City CA, 94404 United States	Electronic Service		No	Official 24-432
134	Frank	Kohlasch	frank.kohlasch@state.mn.us		Minnesota Pollution Control Agency	520 Lafayette Rd N. St. Paul MN, 55155 United States	Electronic Service		No	Official 24-432
135	Brian	Krambeer	bkrambeer@mienergy.coop	MiEnergy Cooperative		PO Box 626 31110 Cooperative Way Rushford MN,	Electronic Service		No	Official 24-432

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						55971 United States				
136	Michael	Krause	michaelkrause61@yahoo.com			1200 Plymouth Avenue Minneapolis MN, 55411 United States	Electronic Service		No	Official 24-432
137	Michael	Krikava	mkrikava@taftlaw.com	Taft Stettinius & Hollister LLP		2200 IDS Center 80 S 8th St Minneapolis MN, 55402 United States	Electronic Service		No	Official 24-432
138	Nicolle	Kupser	nkupser@greatermngas.com	Greater Minnesota Gas, Inc.		1900 Cardinal Ln PO Box 798 Faribault MN, 55021 United States	Electronic Service		No	Official 24-432
139	Matthew	Lacey	mlacey@greenergy.com	Great River Energy		12300 Elm Creek Boulevard Maple Grove MN, 55369- 4718 United States	Electronic Service		No	Official 24-432
140	Mary	LaGarde	mlagarde@maicnet.org	Minneapolis American Indian Center		1530 E Franklin Ave Minneapolis MN, 55404 United States	Electronic Service		No	Official 24-432
141	Holly	Lahd	holly.lahd@target.com	Target Corporation		33 South 6th St CC-28662 Minneapolis MN, 55402 United States	Electronic Service		No	Official 24-432
142	Carmel	Laney	carmel.laney@stoel.com	Stoel Rives LLP		33 South Sixth Street Suite 4200 Minneapolis MN, 55402 United States	Electronic Service		No	Official 24-432
143	James D.	Larson	james.larson@avantenergy.com	Avant Energy Services		220 S 6th St Ste 1300 Minneapolis MN, 55402 United States	Electronic Service		No	Official 24-432
144	Peder	Larson	plarson@larkinhoffman.com	Larkin Hoffman Daly & Lindgren, Ltd.		8300 Norman Center Drive Suite 1000 Bloomington MN, 55437 United States	Electronic Service		No	Official 24-432
145	Kevin	Lee	kleee@bluegreenalliance.org	BlueGreen Alliance		2701 University Ave SE Ste. 209 Minneapolis MN, 55414 United States	Electronic Service		No	Official 24-432
146	Dean	Leischow	dean@sunrisenrg.com	Sunrise Energy Ventures		315 Manitoba Ave Ste 200 Wayzata MN, 55391 United States	Electronic Service		No	Official 24-432
147	Annie	Levenson Falk	annielf@cubminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota Street, Suite W1360 St. Paul MN, 55101 United States	Electronic Service		No	Official 24-432
148	Ryan	Long	ryan.j.long@xcelenergy.com			414 Nicollet Mall 401 8th Floor	Electronic Service		No	Official 24-432

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						Minneapolis MN, 55401 United States				
149	Jason	Loos	jason.loos@centerpointenergy.com	CenterPoint Energy Resources Corp.		505 Nicollet Mall 3rd Floor Minneapolis MN, 55402 United States	Electronic Service		No	Official 24-432
150	Susan	Ludwig	sludwig@mnpower.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	Official 24-432
151	Alice	Madden	alice@communitypowermn.org	Community Power		2720 E 22nd St Minneapolis MN, 55406 United States	Electronic Service		No	Official 24-432
152	Kavita	Maini	kmaini@wi.rr.com	KM Energy Consulting, LLC		961 N Lost Woods Rd Oconomowoc WI, 53066 United States	Electronic Service		No	Official 24-432
153	Emily	Marshall	emarshall@tourismarshall.com	Miller O'Brien Jensen, PA		120 S. 6th Street Suite 2400 Minneapolis MN, 55402 United States	Electronic Service		No	Official 24-432
154	Katherine	Marshall	katie.marshall@lawmoss.com	Moss & Barnett		150 S 5th St Ste 1200 Minneapolis MN, 55402 United States	Electronic Service		No	Official 24-432
155	Mary	Martinka	mary.a.martinka@xcelenergy.com	Xcel Energy Inc		414 Nicollet Mall 7th Floor Minneapolis MN, 55401 United States	Electronic Service		No	Official 24-432
156	Gregg	Mast	gmast@cleanenergyeconomymn.org	Clean Energy Economy Minnesota		4808 10th Avenue S Minneapolis MN, 55417 United States	Electronic Service		No	Official 24-432
157	Daryl	Maxwell	dmaxwell@hydro.mb.ca	Manitoba Hydro		360 Portage Ave FL 16 PO Box 815, Station Main Winnipeg MB, R3C 2P4 Canada	Electronic Service		No	Official 24-432
158	Erica	McConnell	emcconnell@elpc.org	Environmental Law & Policy Center		35 E. Wacker Drive, Suite 1600 Chicago IL, 60601 United States	Electronic Service		No	Official 24-432
159	Lilly B.	McKenna	lilly.mckenna@stoel.com	Stoel Rives LLP		One Montgomery St Ste 3230 San Francisco CA, 94104 United States	Electronic Service		No	Official 24-432
160	Taylor	McNair	taylor@gridlab.org			668 Capp Street San Francisco CA, 94110 United States	Electronic Service		No	Official 24-432
161	Sally Anne	McShane	sally.anne.mcshane@state.mn.us		Public Utilities Commission	121 7th Place E Suite 350 St. Paul MN,	Electronic Service		Yes	Official 24-432

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						55101 United States				
162	Stephen	Melchionne	stephen.melchionne@ag.state.mn.us		Office of the Attorney General - Department of Commerce	445 Minnesota Street, Ste. 1400 St. Paul MN, 55101 United States	Electronic Service		Yes	Official 24-432
163	Thomas	Melone	thomas.melone@allcous.com	Minnesota Go Solar LLC		222 South 9th Street Suite 1600 Minneapolis MN, 55120 United States	Electronic Service		No	Official 24-432
164	Greg	Merz	greg.merz@ag.state.mn.us		Office of the Attorney General - Department of Commerce	445 Minnesota Street Suite 1400 St. Paul MN, 55101 United States	Electronic Service		Yes	Official 24-432
165	Peder	Mewis	pmewis@cleangridalliance.org	Clean Grid Alliance		570 Asbury St. St. Paul MN, 55104 United States	Electronic Service		No	Official 24-432
166	Joseph	Meyer	joseph.meyer@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	Bremer Tower, Suite 1400 445 Minnesota Street St Paul MN, 55101-2131 United States	Electronic Service		Yes	Official 24-432
167	Kevin	Miller	kevin.miller@chargepoint.com			254 E. Hacienda Avenue Campbell CA, 95008 United States	Electronic Service		No	Official 24-432
168	Stacy	Miller	stacy.miller@minneapolismn.gov	City of Minneapolis		350 S. 5th Street Room M 301 Minneapolis MN, 55415 United States	Electronic Service		No	Official 24-432
169	David	Moeller	dmoeller@allte.com	Minnesota Power			Electronic Service		No	Official 24-432
170	Marc	Monbouquette	marc.monbouquette@enel.com	Enel X North America, Inc.		846 Bransten Rd San Carlos CA, 94070 United States	Electronic Service		No	Official 24-432
171	Dalene	Monsebroten	dalene.monsebroten@nmpagency.com	Northern Municipal Power Agency		123 2nd St W Thief River Falls MN, 56701 United States	Electronic Service		No	Official 24-432
172	Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP		33 South Sixth St Ste 4200 Minneapolis MN, 55402 United States	Electronic Service		No	Official 24-432
173	Christa	Moseng	christa.moseng@state.mn.us		Office of Administrative Hearings	P.O. Box 64620 Saint Paul MN, 55164-0620 United States	Electronic Service		Yes	Official 24-432
174	Evan	Mulholland	emulholland@mncenter.org	Minnesota Center for Environmental Advocacy		1919 University Ave W Ste 515 Saint Paul	Electronic Service		No	Official 24-432

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						MN, 55101 United States				
175	Alan	Muller	alan@greendel.org	Energy & Environmental Consulting		1110 West Avenue Red Wing MN, 55066 United States	Electronic Service		No	Official 24-432
176	Kristin	Munsch	kmunsch@citizensutilityboard.org	Citizens Utility Board of Minnesota		309 W. Washington St. Ste. 800 Chicago IL, 60606 United States	Electronic Service		No	Official 24-432
177	Travis	Murray	travis.murray@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	445 Minnesota St Ste 1400 Saint Paul MN, 55101 United States	Electronic Service		Yes	Official 24-432
178	Amanda	Myers	amanda@weavegrid.com	Weave Grid, Inc.		222 7th Street 2nd Floor San Francisco CA, 94103 United States	Electronic Service		No	Official 24-432
179	Mark	Nabong	mnabong@nrdc.org	Natural Resources Defense Council		20 N. Wacker Drive #1600 Chicago IL, 60606 United States	Electronic Service		No	Official 24-432
180	Ben	Nelson	benn@cmpasgroup.org	CMPMA		459 South Grove Street Blue Earth MN, 56013 United States	Electronic Service		No	Official 24-432
181	Carl	Nelson	cnelson@mncee.org	Center for Energy and Environment		212 3rd Ave N Ste 560 Minneapolis MN, 55401 United States	Electronic Service		No	Official 24-432
182	David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency		220 South Sixth Street Suite 1300 Minneapolis MN, 55402 United States	Electronic Service		No	Official 24-432
183	Sephra	Ninow	sephra.ninow@energycenter.org	Center for Sustainable Energy		426 17th Street, Suite 700 Oakland CA, 94612 United States	Electronic Service		No	Official 24-432
184	Michael	Noble	noble@fresh-energy.org	Fresh Energy		408 Saint Peter St Ste 350 Saint Paul MN, 55102 United States	Electronic Service		No	Official 24-432
185	Rolf	Nordstrom	rnordstrom@gpsd.net	Great Plains Institute		2801 21ST AVE S STE 220 Minneapolis MN, 55407-1229 United States	Electronic Service		No	Official 24-432
186	Samantha	Norris	samanthanorris@alliantenergy.com	Interstate Power and Light Company		200 1st Street SE PO Box 351 Cedar Rapids IA, 52406-0351 United States	Electronic Service		No	Official 24-432
187	Christian	Noyce	christian.noyce@state.mn.us		Public Utilities Commission	759 Hague Ave St Paul MN, 55104 United States	Electronic Service		Yes	Official 24-432

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
188	David	O'Brien	david.obrien@navigant.com	Navigant Consulting		77 South Bedford St Ste 400 Burlington MA, 01803 United States	Electronic Service		No	Official 24-432
189	M. William	O'Brien	bobrien@mojlaw.com	Miller O'Brien Jensen, P.A.		120 S 6th St Ste 2400 Minneapolis MN, 55402 United States	Electronic Service		No	Official 24-432
190	Ric	O'Connell	ric@gridlab.org	GridLab		2120 University Ave Berkeley CA, 94704 United States	Electronic Service		No	Official 24-432
191	Jeff	O'Neill	jeff.oneill@ci.monticello.mn.us	City of Monticello		505 Walnut Street Suite 1 Monticello MN, 55362 United States	Electronic Service		No	Official 24-432
192	Matthew	Olsen	molsen@otpc.com	Otter Tail Power Company		215 South Cascade Street Fergus Falls MN, 56537 United States	Electronic Service		No	Official 24-432
193	Russell	Olson	rolson@hcpd.com	Heartland Consumers Power District		PO Box 248 Madison SD, 57042-0248 United States	Electronic Service		No	Official 24-432
194	Debra	Opatz	dopatz@otpc.com	Otter Tail Power Company		215 South Cascade Street Fergus Falls MN, 56537 United States	Electronic Service		No	Official 24-432
195	Nate	O'Reilly	nate@iron512.com			851 Pierce Butler Route St Paul MN, 55104 United States	Electronic Service		No	Official 24-432
196	Carol A.	Overland	overland@legalelectric.org	Legalelectric - Overland Law Office		1110 West Avenue Red Wing MN, 55066 United States	Electronic Service		No	Official 24-432
197	John	Pacheco	johnpachecojr@gmail.com			null null, null United States	Electronic Service		No	Official 24-432
198	Greg	Palmer	gpalmer@greatermngas.com	Greater Minnesota Gas, Inc.		1900 Cardinal Ln PO Box 798 Faribault MN, 55021 United States	Electronic Service		No	Official 24-432
199	Jessica	Palmer Denig	jessica.palmer-denig@state.mn.us		Office of Administrative Hearings	600 Robert St N PO Box 64620 St. Paul MN, 55164 United States	Electronic Service		Yes	Official 24-432
200	Dan	Patry	dpatry@sunedison.com	SunEdison		600 Clipper Drive Belmont CA, 94002 United States	Electronic Service		No	Official 24-432
201	Jeffrey C	Paulson	jeff.jcplaw@comcast.net	Paulson Law Office, Ltd.		4445 W 77th Street Suite 224 Edina MN, 55435 United States	Electronic Service		No	Official 24-432

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
215	John	Reynolds	john.reynolds@nfib.org			180 5th St E Suite 260 St. Paul MN, 55101 United States	Electronic Service		No	Official 24-432
216	Whitney	Richardson	whitney.richardson@evgo.com	EVgo Services, LLC		11835 W Olympic Blvd Ste 900E Los Angeles CA, 90064 United States	Electronic Service		No	Official 24-432
217	Noah	Roberts	nroberts@cleanpower.org	Energy Storage Association		1155 15th St NW, Ste 500 Washington DC, 20005 United States	Electronic Service		No	Official 24-432
218	Alice	RobertsDavis	admin.info@state.mn.us	Department of Administration		15 Sherburne Avenue St. Paul MN, 55155 United States	Electronic Service		No	Official 24-432
219	Susan	Romans	sromans@allte.com	Minnesota Power		30 West Superior Street Legal Dept Duulth MN, 55802 United States	Electronic Service		No	Official 24-432
220	Amanda	Rome	amanda.rome@xcelenergy.com	Xcel Energy		414 Nicollet Mall FL 5 Minneapolis MN, 55401 United States	Electronic Service		No	Official 24-432
221	Robert K.	Sahr	bsahr@eastriver.coop	East River Electric Power Cooperative		P.O. Box 227 Madison SD, 57042 United States	Electronic Service		No	Official 24-432
222	Renee	Samson	rsamson@freewiretech.com	FreeWire Technologies		1999 Harrison St Oakland CA, 94612 United States	Electronic Service		No	Official 24-432
223	Joseph L	Sathe	jsathe@kennedy-graven.com	Kennedy & Graven, Chartered		150 S 5th St Ste 700 Minneapolis MN, 55402 United States	Electronic Service		No	Official 24-432
224	Tim	Schaefer	thschaef@gmail.com	Environment MN		211 N 1st St Ste 480 Minneapolis MN, 55401 United States	Electronic Service		No	Official 24-432
225	Kevin	Schlangen	kevin.schlangen@co.dakota.mn.us	Dakota County		2800 160th Street West Rosemount MN, 55068 United States	Electronic Service		No	Official 24-432
226	Jacob J.	Schlesinger	jschlesinger@keyesfox.com	Keyes & Fox LLP		1580 Lincoln St Ste 880 Denver CO, 80203 United States	Electronic Service		No	Official 24-432
227	Elizabeth	Schmiesing	eschmiesing@winthrop.com	Winthrop & Weinstine, P.A.		225 South Sixth Street Suite 3500 Minneapolis MN, 55402 United States	Electronic Service		No	Official 24-432
228	Peter	Scholtz	peter.scholtz@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	Suite 1400 445 Minnesota Street St. Paul MN, 55101-2131 United States	Electronic Service		Yes	Official 24-432

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
229	Kay	Schraeder	kschraeder@minnkota.com	Minnkota Power		5301 32nd Ave S Grand Forks ND, 58201 United States	Electronic Service		No	Official 24-432
230	Lori	Schultz	lorischultz@minncap.org	Minnesota Community Action Partnership		MCIT Building 100 Empire Dr Ste 202 St. Paul MN, 55103 United States	Electronic Service		No	Official 24-432
231	Christine	Schwartz	regulatory.records@xcelenergy.com	Xcel Energy		414 Nicollet Mall, MN1180-07-MCA Minneapolis MN, 55401-1993 United States	Electronic Service		No	Official 24-432
232	Doug	Scott	dscott@gpisd.net	Great Plains Institute		2801 21st Ave Ste 220 Minneapolis MN, 55407 United States	Electronic Service		No	Official 24-432
233	Dean	Sedgwick	sedgwick@itascapower.com	Itasca Power Company		PO Box 455 Spring Lake MN, 56680 United States	Electronic Service		No	Official 24-432
234	Maria	Seidler	maria.seidler@dom.com	Dominion Energy Technology		120 Tredegar Street Richmond VA, 23219 United States	Electronic Service		No	Official 24-432
235	Timothy	Sexton	timothy.sexton@state.mn.us		Minnesota Department of Transportation	395 John Ireland Blvd St. Paul MN, 55155-1899 United States	Electronic Service		No	Official 24-432
236	Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates		7400 Lyndale Ave S Ste 190 Richfield MN, 55423 United States	Electronic Service		No	Official 24-432
237	Patricia	Sharkey	psharkey@environmentallawcounsel.com	Midwest Cogeneration Association.		180 N LaSalle St Ste 3700 Chicago IL, 60601 United States	Electronic Service		No	Official 24-432
238	Bria	Shea	bria.e.shea@xcelenergy.com	Xcel Energy		414 Nicollet Mall Minneapolis MN, 55401 United States	Electronic Service		No	Official 24-432
239	Doug	Shoemaker	dougs@charter.net	Minnesota Renewable Energy		2928 5th Ave S Minneapolis MN, 55408 United States	Electronic Service		No	Official 24-432
240	Anne	Smart	anne.smart@chargepoint.com	ChargePoint, Inc.		254 E Hacienda Ave Campbell CA, 95008 United States	Electronic Service		No	Official 24-432
241	Amanda	Smith	amanda.smith@state.mn.us		Minnesota Pollution Control Agency	520 Lafayette Rd N St. Paul MN, 55155 United States	Electronic Service		No	Official 24-432
242	Beth	Smith	bsmith@greatermankato.com	Greater Mankato Growth		1961 Premier Dr Ste 100 Mankato MN, 56001 United States	Electronic Service		No	Official 24-432
243	Joshua	Smith	joshua.smith@sierraclub.org			85 Second St FL 2	Electronic Service		No	Official 24-432

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						San Francisco CA, 94105 United States				
244	Ken	Smith	ken.smith@ever-greenenergy.com	Ever Green Energy		305 Saint Peter St Saint Paul MN, 55102 United States	Electronic Service		No	Official 24-432
245	Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.		76 W Kellogg Blvd St. Paul MN, 55102 United States	Electronic Service		No	Official 24-432
246	Trevor	Smith	trevor.smith@avantenergy.com	Avant Energy, Inc.		220 South Sixth Street Suite 1300 Minneapolis MN, 55402 United States	Electronic Service		No	Official 24-432
247	Beth	Soholt	bsoholt@cleangridalliance.org	Clean Grid Alliance		570 Asbury Street Suite 201 St. Paul MN, 55104 United States	Electronic Service		No	Official 24-432
248	Anna	Sommer	asommer@energyfuturesgroup.com	Energy Futures Group		PO Box 692 Canton NY, 13617 United States	Electronic Service		No	Official 24-432
249	Peggy	Sorum	peggy.sorum@centerpointenergy.com	CenterPoint Energy		505 Nicollet Mall Minneapolis MN, 55402 United States	Electronic Service		No	Official 24-432
250	Mark	Spurr	mspurr@fvbenergy.com	International District Energy Association		222 South Ninth St., Suite 825 Minneapolis MN, 55402 United States	Electronic Service		No	Official 24-432
251	Sky	Stanfield	stanfield@smwlaw.com	Shute, Mihaly & Weinberger		396 Hayes Street San Francisco CA, 94102 United States	Electronic Service		No	Official 24-432
252	Jamez	Staples	jstaples@renewablenrgpartners.com	Renewable Energy Partners		3033 Excelsior Blvd S Minneapolis MN, 55416 United States	Electronic Service		No	Official 24-432
253	Russ	Stark	russ.stark@ci.stpaul.mn.us	City of St. Paul		Mayor's Office 15 W. Kellogg Blvd., Suite 390 Saint Paul MN, 55102 United States	Electronic Service		No	Official 24-432
254	Byron E.	Starns	byron.starns@stinson.com	STINSON LLP		50 S 6th St Ste 2600 Minneapolis MN, 55402 United States	Electronic Service		No	Official 24-432
255	Richard	Stasik	richard.stasik@wecenergygroup.com	Minnesota Energy Resources Corporation (HOLDING)		231 West Michigan St - P321 Milwaukee WI, 53203 United States	Electronic Service		No	Official 24-432
256	Kristin	Stastny	kstastny@taftlaw.com	Taft Stettinius & Hollister LLP		2200 IDS Center 80 South 8th Street Minneapolis MN, 55402 United States	Electronic Service		No	Official 24-432

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
257	Lindsey	Stegall	lindsey.stegall@evgo.com	EVgo Services, LLC		11835 W Olympic Blvd Ste 900E Los Angeles CA, 90064 United States	Electronic Service		No	Official 24-432
258	Cary	Stephenson	cstephenson@otpc.com	Otter Tail Power Company		215 South Cascade Street Fergus Falls MN, 56537 United States	Electronic Service		No	Official 24-432
259	Scott	Strand	sstrand@elpc.org	Environmental Law & Policy Center		60 S 6th Street Suite 2800 Minneapolis MN, 55402 United States	Electronic Service		No	Official 24-432
260	James M	Strommen	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered		150 S 5th St Ste 700 Minneapolis MN, 55402 United States	Electronic Service		No	Official 24-432
261	Dean	Taylor	dtaylor@pluginamerica.org	Plug In America		6380 Wilshire Blvd, Suite 1000 Los Angeles CA, 90048 United States	Electronic Service		No	Official 24-432
262	Hanna	Terwilliger	hanna.terwilliger@state.mn.us		Public Utilities Commission	121 East 7th Place, Suite 350 Saint Paul MN, 55101 United States	Electronic Service		Yes	Official 24-432
263	Stuart	Tommerdahl	stommerdahl@otpc.com	Otter Tail Power Company		215 S Cascade St PO Box 496 Fergus Falls MN, 56537 United States	Electronic Service		No	Official 24-432
264	Taige	Tople	taige.d.tople@xcelenergy.com	Northern States Power Company dba Xcel Energy-Elec		414 Nicollet Mall 401 7th Floor Minneapolis MN, 55401 United States	Electronic Service		No	Official 24-432
265	Pat	Treseler	pat.jcplaw@comcast.net	Paulson Law Office LTD		4445 W 77th Street Suite 224 Edina MN, 55435 United States	Electronic Service		No	Official 24-432
266	Analeisha	Vang	avang@mnpower.com			30 W Superior St Duluth MN, 55802-2093 United States	Electronic Service		No	Official 24-432
267	Nikhil	Vijaykar	nvijaykar@keyesfox.com	Keyes & Fox LLP		580 California St 12th Floor San Francisco CA, 94104 United States	Electronic Service		No	Official 24-432
268	Christopher	Villarreal	cvillarreal@rstreet.org	R Street Institute		1212 New York Ave NW Ste 900 Washington DC, 20005 United States	Electronic Service		No	Official 24-432
269	Julie	Voeck	julie.voeck@nee.com	NextEra Energy Resources, LLC		700 Universe Blvd Juno Beach FL, 33408 United States	Electronic Service		No	Official 24-432
270	Amelia	Vohs	avohs@mncenter.org	Minnesota Center for		1919 University Avenue West	Electronic Service		No	Official 24-432

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
				Environmental Advocacy		Suite 515 St. Paul MN, 55104 United States				
271	Curt	Volkman	curt@newenergy-advisors.com	Fresh Energy		408 St Peter St Saint Paul MN, 55102 United States	Electronic Service		No	Official 24-432
272	Dwight	Wagenius	dwagenius@gmail.com	Minnesota Interfaith Power & Light		4407 E Lake St Minneapolis MN, 55406 United States	Electronic Service		No	Official 24-432
273	Francesca	Wahl	fwahl@tesla.com	Tesla		3500 Deer Creek Rd Palo Alto CA, 94304 United States	Electronic Service		No	Official 24-432
274	Roger	Warehime	roger.warehime@owatonnautilities.com	Owatonna Municipal Public Utilities - Gas		208 S Walnut Ave PO BOX 800 Owatonna MN, 55060 United States	Electronic Service		No	Official 24-432
275	Jenna	Warmuth	jwarmuth@mnpower.com	Minnesota Power		30 W Superior St Duluth MN, 55802-2093 United States	Electronic Service		No	Official 24-432
276	Darrell	Washington	darrell.washington@state.mn.us		DOT	null null, null United States	Electronic Service		No	Official 24-432
277	Laurie	Williams	laurie.williams@sierraclub.org	Sierra Club		Environmental Law Program 1536 Wynkoop St Ste 200 Denver CO, 80202 United States	Electronic Service		No	Official 24-432
278	Anthony	Willingham	anthony.willingham@electrifyamerica.com	Electrify America		1950 Opportunity Way Suite 1500 Reston VA, 20190 United States	Electronic Service		No	Official 24-432
279	Justin	Wilson	justin.wilson@chargepoint.com	ChargePoint		240 East Hacienda Ave. Campbell CA, 95008 United States	Electronic Service		No	Official 24-432
280	Joseph	Windler	jwindler@winthrop.com	Winthrop & Weinstine		225 South Sixth Street, Suite 3500 Minneapolis MN, 55402 United States	Electronic Service		No	Official 24-432
281	Robyn	Woeste	robynwoeste@alliantenergy.com	Interstate Power and Light Company		200 First St SE Cedar Rapids IA, 52401 United States	Electronic Service		No	Official 24-432
282	Yochi	Zakai	yzakai@smwlaw.com	SHUTE, MIHALY & WEINBERGER LLP		396 Hayes Street San Francisco CA, 94102 United States	Electronic Service		No	Official 24-432
283	Alicia	Zaloga	azaloga@keyesfox.com	Keyes & Fox, LLP		1155 Kildaire Farm Rd Ste 202-203 Cary NC, 27511 United States	Electronic Service		No	Official 24-432

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284	Christopher	Zibart	czibart@atcllc.com	American Transmission Company LLC		W234 N2000 Ridgeview Pkwy Court Waukesha WI, 53188-1022 United States	Electronic Service		No	Official 24-432
285	Kurt	Zimmerman	kwz@ibew160.org	Local Union #160, IBEW		2909 Anthony Ln St Anthony Village MN, 55418-3238 United States	Electronic Service		No	Official 24-432
286	Patrick	Zomer	pat.zomer@lawmoss.com	Moss & Barnett PA		150 S 5th St #1200 Minneapolis MN, 55402 United States	Electronic Service		No	Official 24-432