



# STATE OF MINNESOTA

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November 20, 2015

Mr. Daniel Wolf  
Minnesota Public Utilities Commission  
350 Metro Square Building  
121 7<sup>th</sup> Place East  
St. Paul, MN 55101-2147

**Re: In the Matter of the Application of Northern States Power Company, d/b/a Xcel Energy, for Authority to Increase Rates for Electric Service in the State of Minnesota**  
**Docket No. E-002/GR-15-826**

Dear Mr. Wolf:

The Office of Attorney General – Residential Utilities and Antitrust Division (“OAG”) submits the following response to Xcel’s comments of November 17, 2015. The OAG recognizes that the Commission did not request a response to comments filed on November 17. These brief comments are necessary, however, to address Xcel’s new position—or at least the position it stated for the first time—that its 2017 and 2018 “plan years” should be treated as “test years” so that the company may receive an interim rate increase in 2017.<sup>1</sup> Xcel’s claim that its 2017 and 2018 plan years are, in fact, test years relies on a misreading of Commission rules. In addition, Xcel’s claim that that OAG’s reading of the amended MYRP Statute renders its language meaningless is misplaced because it ignores the language of the Commission’s previous MYRP Order.

First, Xcel’s claim that its 2017 plan year is consistent with the Commission’s definition of “test year” is wrong. The Commission has defined a test year as “the 12-month period selected by the utility for the purpose of expressing its need for a change in rates.”<sup>2</sup> Xcel argues that, since its 2017 plan year expresses a requested change in rates from its proposed 2016 test

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<sup>1</sup> Xcel consistently referred to 2017 as a “plan year,” and did not refer to 2017 as a “test year” in its filing. This important change requires comment.

<sup>2</sup> Minn. R. 7825.3100. In its November 17, 2015 response, Xcel referred to an incorrect definition of “test year” provided in Minn. R. 7825.2400, which applies to the Commission’s rules related to Automatic Adjustment of Charges, rather than Rate Changes. See Xcel’s Response at 3, n.10.

year, 2017 also constitutes a test year. Nothing in the Commission's rules, however, suggests that a utility's "change in rates" included in the definition of "test year," can refer to a change from the company's proposed rates in one year to proposed rates in a subsequent year. Rather, the Commission's rules consistently refer to a "change in rates" as a proposed change from the utility's Commission-approved rates at the time a rate case is filed. For example, Minnesota Rule 7825.3200 requires that "[a] utility filing for a *change in rates* shall serve notice to the commission at least 90 days prior to the proposed effective date of the modified rates."<sup>3</sup> Other Commission rules also refer to a "change in rates" as a change from a utility's existing, Commission approved rates.<sup>4</sup> The definition of a "test year," therefore, refers to the 12-month period used to evaluate a need of a change from the utility's Commission-approved rates. For this reason, Xcel's current claim that it can have three test years in a single rate case is incorrect.

Second, Xcel's argument that the OAG "fails to read the MYRP Statute and the Interim Rate Statute together, giving both meaning" is misplaced because it fails to consider the Commission's previous MYRP Order. Specifically, Xcel argues that, since "[t]he Interim Rate Statute alone would allow for interim rates to continue at the test year level during the second year of the MYRP," the MYRP Statute cannot be read to authorize interim rates in the same manner. Xcel ignores, however, that the Commission's MYRP Order considered that interim rates during an MYRP may not be based on a utility's test year, stating that "[i]t is *presumed* that interim rates will be calculated based upon the rate case test year *unless it is demonstrated to be reasonable to do otherwise.*"<sup>5</sup> It makes perfect sense, therefore, that the subsequent amendment to the MYRP Statute clarified that interim rates would be set in the same manner as they are set in the Interim Rate Statute—with reference to the test year. In fact, it is Xcel's contrary claim

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<sup>3</sup> (Emphasis added.)

<sup>4</sup> See Minn. R. 7825.3200 ("A utility filing for a *change in rates* shall serve notice to the commission at least 90 days prior to the proposed effective date of the modified rates.") (emphasis added); Minn. R. 7825.3300 ("In the event that a hearing is ordered by the commission as a result of a *change in rates* and proposed rates are suspended . . .") (emphasis added); Minn. R. 7825.3500 ("The utility's proposal for a *change in rates* shall summarize the notice of change in rates and shall include the following information . . .") (emphasis added); Minn. R. 7825.3800 ("The following information shall be supplied as a part of the utility's notice of a *change in rates.*") (emphasis added); Minn. R. 7825.4500 ("Upon review of a utility's notice of a *change in rates* or subsequent thereto, the commission may request a utility to provide additional information to supplement the information prescribed by parts 7825.3800 to 7825.4400 within a reasonable time as determined by the commission.") (emphasis added.)

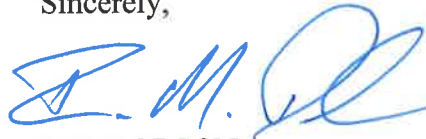
<sup>5</sup> Order Establishing Terms, Conditions, and Procedures for Multiyear Rate Plans, *In re the Minnesota Office of Attorney General – Antitrust and Utilities Division's Petition for a Commission Investigation Regarding Criteria and Standards for Multiyear Rate Plans under Minn. Stat. § 216B, subd. 19*, Dkt. No. E,G999/M-12-587, at Order Point 5 (June 17, 2013) (emphasis added). Notably, the Commission's reference to the "test year" in the MYRP Order supports the conclusion that Xcel has only one test year in a rate case.

Mr. Daniel Wolf  
November 20, 2015  
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that the amendment to the MYRP Statute simply “made explicit” the authority that the Commission had already claimed, which renders the amendment meaningless.<sup>6</sup>

For the reasons set forth above and in the OAG’s November 12, 2015 comments, Xcel is not entitled to an interim rate increase in 2017. Xcel’s request for such an increase should be denied.

Sincerely,



IAN DOBSON  
Assistant Attorney General

(651) 757-1432 (Voice)  
(651) 296-9663 (Fax)

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<sup>6</sup> See Xcel’s Response at 3. Of course, the amendment to the MYRP Statute does not change the Commission’s authority to deviate from the interim rate formula if it determines that “exigent circumstances exist.” Minn. Stat. § 216B.16, subd. 3(b) (2015).

**AFFIDAVIT OF SERVICE**

**Re: *In the Matter of the Application of Northern States Power Company, d/b/a Xcel Energy, for Authority to Increase Rates for Electric Service in the State of Minnesota***  
**Docket No. E-002/GR-15-826**

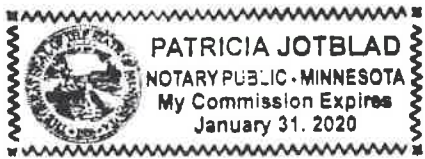
STATE OF MINNESOTA     )  
  ) ss.  
COUNTY OF RAMSEY     )

I hereby state that on November 20, 2015, I filed with eDockets *a Letter of the Office of the Attorney General - Residential Utilities and Antitrust Division* and served the same upon all parties listed on the attached service list by email, and/or United States Mail with postage prepaid, and deposited the same in a U.S. Post Office mail receptacle in the City of St. Paul, Minnesota.

  
Judy Sigal

Subscribed and sworn to before me  
this 20<sup>th</sup> day of November, 2015.

  
Notary Public



My Commission expires: January 31, 2020.

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| Christopher | Anderson  | canderson@allete.com           | Minnesota Power                    | 30 W Superior St<br>Duluth, MN 558022191                                     | Electronic Service | No                | SPL_SL_15-826_Potentially Interested Parties |
| Julia       | Anderson  | Julia.Anderson@ag.state.mn.us  | Office of the Attorney General-DOC | 1800 BRM Tower<br>445 Minnesota St<br>St. Paul, MN 551012134                 | Electronic Service | Yes               | SPL_SL_15-826_Potentially Interested Parties |
| Alison C    | Archer    | alison.c.archer@xcelenergy.com | Xcel Energy                        | 414 Nicollet Mall FL 5<br>Minneapolis, MN 55401                              | Electronic Service | Yes               | SPL_SL_15-826_Potentially Interested Parties |
| Gail        | Baranko   | gail.baranko@xcelenergy.com    | Xcel Energy                        | 414 Nicollet Mall 7th Floor<br>Minneapolis, MN 55401                         | Electronic Service | No                | SPL_SL_15-826_Potentially Interested Parties |
| Ryan        | Barlow    | Ryan.Barlow@ag.state.mn.us     | Office of the Attorney General-RUD | 445 Minnesota Street<br>Bremer Tower, Suite 400<br>St. Paul, Minnesota 55101 | Electronic Service | Yes               | SPL_SL_15-826_Potentially Interested Parties |
| James J.    | Bertrand  | james.bertrand@stinson.com     | Stinson Leonard Street LLP         | 150 South Fifth Street,<br>Suite 2300<br>Minneapolis, MN 55402               | Electronic Service | No                | SPL_SL_15-826_Potentially Interested Parties |
| William     | Black     | bblack@mmua.org                | MMUA                               | Suite 400<br>3025 Harbor Lane North<br>Plymouth, MN 554475142                | Electronic Service | No                | SPL_SL_15-826_Potentially Interested Parties |
| William A.  | Blazar    | bbblazar@mmchamber.com         | Minnesota Chamber Of Commerce      | Suite 1500<br>400 Robert Street North<br>St. Paul, MN 55101                  | Electronic Service | No                | SPL_SL_15-826_Potentially Interested Parties |

| First Name | Last Name | Email                                   | Company Name                                   | Address   | Delivery Method    | View Trade Secret | Service List Name                                   |
|------------|-----------|---|--|---|--------------------|-------------------|---|
| Elizabeth  | Brama     | ebra@briggs.com                         | Briggs and Morgan                              | 2200 IDS Center<br>80 South 8th Street<br>Minneapolis,<br>MN<br>55402 | Electronic Service | Yes               | SPL_SL_15-<br>826_Potentially Interested<br>Parties |
| James      | Canaday   | james.canaday@ag.state.mn.us            | Office of the Attorney<br>General-RUD          | Suite 1400<br>445 Minnesota St.<br>St. Paul,<br>MN<br>55101           | Electronic Service | Yes               | SPL_SL_15-<br>826_Potentially Interested<br>Parties |
| Steve W.   | Chriss    | Stephen.chriss@wal-mart.com             | Wal-Mart                                       | 2001 SE 10th St.<br>Bentonville,<br>AR<br>72716-5530                  | Electronic Service | No                | SPL_SL_15-<br>826_Potentially Interested<br>Parties |
| Jeanne     | Cochran   | Jeanne.Cochran@state.mn.us              | Office of Administrative<br>Hearings           | P.O. Box 64620<br>St. Paul,<br>MN<br>55164-0620                       | Electronic Service | No                | SPL_SL_15-<br>826_Potentially Interested<br>Parties |
| John       | Coffman   | john@johncoffman.net                    | AARP   | 871 Tuxedo Blvd.<br>St. Louis,<br>MO<br>63119-2044                    | Electronic Service | No                | SPL_SL_15-<br>826_Potentially Interested<br>Parties |
| Leigh      | Currie    | lcurrie@mncenter.org                    | Minnesota Center for<br>Environmental Advocacy | 26 E. Exchange St., Suite<br>206<br>St. Paul,<br>Minnesota<br>55101   | Electronic Service | No                | SPL_SL_15-<br>826_Potentially Interested<br>Parties |
| Lisa       | Daniels   | lisadaniels@windustry.org               | Windustry                                      | 201 Ridgewood Ave<br>Minneapolis,<br>MN<br>55403                      | Electronic Service | No                | SPL_SL_15-<br>826_Potentially Interested<br>Parties |
| Jeffrey A. | Daugherty | Jeffrey.daugherty@centerpointenergy.com | CenterPoint Energy                             | 800 LaSalle Ave<br>Minneapolis,<br>MN<br>55402                        | Electronic Service | No                | SPL_SL_15-<br>826_Potentially Interested<br>Parties |
| James      | Denniston | james.r.denniston@xcelenergy.com        | Xcel Energy Services, Inc.                     | 414 Nicollet Mall, Fifth<br>Floor<br>Minneapolis,<br>MN<br>55401      | Electronic Service | Yes               | SPL_SL_15-<br>826_Potentially Interested<br>Parties |

| First Name | Last Name      | Email                           | Company Name                       | Address   | Delivery Method            | View Trade Secret | Service List Name                                   |
|------------|----------------|---------------------------------|------------------------------------|---|----------------------------|-------------------|---|
| Ian        | Dobson         | ian.dobson@ag.state.mn.us       | Office of the Attorney General-RUD | Anitrust and Utilities Division<br>445 Minnesota Street,<br>BRM Tower<br>St. Paul,<br>MN<br>55101 | Electronic Service<br>1400 | Yes               | SPL_SL_15-<br>826_Potentially Interested<br>Parties |
| Kristen    | Eide Tollefson | N/A                             | R-CURE                             | 28477 N Lake Ave<br>Frontenac,<br>MN<br>55026-1044  | Paper Service              | No                | SPL_SL_15-<br>826_Potentially Interested<br>Parties |
| Rebecca    | Eilers         | rebecca.d.eilers@xcelenergy.com | Xcel Energy                        | 414 Nicollet Mall, 7th Floor<br>Minneapolis,<br>MN<br>55401                                       | Electronic Service         | No                | SPL_SL_15-<br>826_Potentially Interested<br>Parties |
| John       | Farrell        | jfarrell@lslr.org               | Institute for Local Self-Reliance  | 1313 5th St SE #303<br>Minneapolis,<br>MN<br>55414  | Electronic Service         | No                | SPL_SL_15-<br>826_Potentially Interested<br>Parties |
| Emma       | Fazio          | emma.fazio@stoel.com            | Stoel Rives LLP                    | 33 South Sixth Street<br>Suite 4200<br>Minneapolis,<br>MN<br>55402                                | Electronic Service         | No                | SPL_SL_15-<br>826_Potentially Interested<br>Parties |
| Sharon     | Ferguson       | sharon.ferguson@state.mn.us     | Department of Commerce             | 85 7th Place E Ste 500<br>Saint Paul,<br>MN<br>55102198   | Electronic Service         | Yes               | SPL_SL_15-<br>826_Potentially Interested<br>Parties |
| Stephen    | Fogel          | Stephen.E.Fogel@XcelEnergy.com  | Xcel Energy Services, Inc.         | 816 Congress Ave, Suite<br>1650<br>Austin,<br>TX<br>78701   | Electronic Service         | No                | SPL_SL_15-<br>826_Potentially Interested<br>Parties |
| Stacey     | Fujii          | sfujii@grenergy.com             | Great River Energy                 | 12300 Elm Creek<br>Boulevard<br>Maple Grove,<br>MN<br>553694718                                   | Electronic Service         | No                | SPL_SL_15-<br>826_Potentially Interested<br>Parties |
| Edward     | Garvey         | garveyed@aol.com                | Residence                          | 32 Lawton St<br>Saint Paul,<br>MN<br>55102  | Electronic Service         | No                | SPL_SL_15-<br>826_Potentially Interested<br>Parties |

| First Name | Last Name  | Email                       | Company Name                         | Address  | Delivery Method    | View Trade Secret | Service List Name                            |
|------------|------------|-----------------------------|--------------------------------------|--|--------------------|-------------------|--|
| Benjamin   | Gerber     | bgerber@mnrchamber.com      | Minnesota Chamber of Commerce        | 400 Robert Street North<br>Suite 1500<br>St. Paul,<br>Minnesota<br>55101 | Electronic Service | Yes               | SPL_SL_15-826_Potentially Interested Parties |
| Bruce      | Gerhardson | bgerhardson@otpc.com        | Offter Tail Power Company            | PO Box 496<br>215 S Cascade St<br>Fergus Falls,<br>MN<br>565380496       | Electronic Service | No                | SPL_SL_15-826_Potentially Interested Parties |
| Janet      | Gonzalez   | Janet.gonzalez@state.mn.us  | Public Utilities Commission          | Suite 350<br>121 7th Place East<br>St. Paul,<br>MN<br>55101              | Electronic Service | Yes               | SPL_SL_15-826_Potentially Interested Parties |
| David      | Grover     | dgrover@itctransco.com      | ITC Midwest                          | 901 Marquette Avenue<br>Suite 1950<br>Minneapolis,<br>MN<br>55402        | Electronic Service | No                | SPL_SL_15-826_Potentially Interested Parties |
| Todd J.    | Guerrero   | todd.guerrero@kutakrock.com | Kutak Rock LLP                       | Suite 1750<br>220 South Sixth Street<br>Minneapolis,<br>MN<br>554021425  | Electronic Service | No                | SPL_SL_15-826_Potentially Interested Parties |
| J Drake    | Hamilton   | hamilton@fresh-energy.org   | Fresh Energy                         | 408 St Peter St<br>Saint Paul,<br>MN<br>55101                            | Electronic Service | No                | SPL_SL_15-826_Potentially Interested Parties |
| Anneté     | Henkel     | mui@mnuutilityinvestors.org | Minnesota Utility Investors          | 413 Wacouta Street<br>#230<br>St.Paul,<br>MN<br>55101                    | Electronic Service | No                | SPL_SL_15-826_Potentially Interested Parties |
| Michael    | Hoppe      | il23@mtn.org                | Local Union 23, I.B.E.W.             | 932 Payne Avenue<br>St. Paul,<br>MN<br>55130                             | Electronic Service | No                | SPL_SL_15-826_Potentially Interested Parties |
| Jim        | Horan      | Jim@MREA.org                | Minnesota Rural Electric Association | 11640 73rd Ave N<br>Maple Grove,<br>MN<br>55369                          | Electronic Service | No                | SPL_SL_15-826_Potentially Interested Parties |
| Anne       | Hunt       | anne.hunt@ci.stpaul.mn.us   | City of St. Paul                     | 390 City Hall<br>15 West Kellogg Boulevard<br>Saint Paul,<br>MN<br>55102 | Electronic Service | No                | SPL_SL_15-826_Potentially Interested Parties |

| First Name | Last Name        | Email                         | Company Name                          | Address  | Delivery Method    | View Trade Secret | Service List Name                                   |
|------------|------------------|-------------------------------|---------------------------------------|--|--------------------|-------------------|---|
| Alan       | Jenkins          | aj@jenkinsattaw.com           | Jenkins at Law                        | 2265 Roswell Road<br>Suite 100<br>Marietta,<br>GA<br>30062                 | Electronic Service | No                | SPL_SL_15-<br>826_Potentially Interested<br>Parties |
| Eric       | Jensen           | ejensen@iwia.org              | Izaak Walton League of<br>America     | 213 East 4th Street Suite<br>412<br><br>St. Paul,<br>MN<br>55101           | Electronic Service | No                | SPL_SL_15-<br>826_Potentially Interested<br>Parties |
| Linda      | Jensen           | linda.s.jensen@ag.state.mn.us | Office of the Attorney<br>General-DOC | 1800 BRM Tower 445<br>Minnesota Street<br><br>St. Paul,<br>MN<br>551012134 | Electronic Service | Yes               | SPL_SL_15-<br>826_Potentially Interested<br>Parties |
| Richard    | Johnson          | Rick.Johnson@lawmoss.com      | Moss & Barnett                        | 150 S. 5th Street<br>Suite 1200<br>Minneapolis,<br>MN<br>55402             | Electronic Service | Yes               | SPL_SL_15-<br>826_Potentially Interested<br>Parties |
| Sarah      | Johnson Phillips | sphilips@stoel.com            | Stoel Rives LLP                       | 33 South Sixth Street<br>Suite 4200<br>Minneapolis,<br>MN<br>55402         | Electronic Service | No                | SPL_SL_15-<br>826_Potentially Interested<br>Parties |
| Mark J.    | Kaufman          | mkaufman@ibewlocal949.org     | IBEW Local Union 949                  | 12908 Nicollet Avenue<br>South<br><br>Burnsville,<br>MN<br>55337           | Electronic Service | No                | SPL_SL_15-<br>826_Potentially Interested<br>Parties |
| Brad       | Klein            | bklein@ejpc.org               | Environmental Law &<br>Policy Center  | 35 E. Wacker Drive, Suite<br>1600<br>Chicago,<br>IL<br>60601               | Electronic Service | No                | SPL_SL_15-<br>826_Potentially Interested<br>Parties |
| Thomas     | Koehler          | TGK@IBEW160.org               | Local Union #160, IBEW                | 2909 Anthony Ln<br><br>St Anthony Village,<br>MN<br>55418-3238             | Electronic Service | No                | SPL_SL_15-<br>826_Potentially Interested<br>Parties |
| Mara       | Koeller          | mara.n.koeller@xcelenergy.com | Xcel Energy                           | 414 Nicollet Mall<br>5th Floor<br>Minneapolis,<br>MN<br>55401              | Electronic Service | No                | SPL_SL_15-<br>826_Potentially Interested<br>Parties |



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|------------|-----------|---------------------------------|---|---|--------------------|-------------------|---|
| Michael    | Krikava   | mknikava@briggs.com             | Briggs And Morgan, P.A.                 | 2200 IDS Center<br>80 S 8th St<br>Minneapolis,<br>MN<br>55402                       | Electronic Service | No                | SPL_SL_15-<br>826_Potentially Interested<br>Parties |
| Allen      | Krug      | allen.krug@xcelenergy.com       | Xcel Energy                             | 414 Nicollet Mall-7th fl<br><br>Minneapolis,<br>MN<br>55401                         | Electronic Service | No                | SPL_SL_15-<br>826_Potentially Interested<br>Parties |
| Holly      | Lahd      | lahd@fresh-energy.org           | Fresh Energy                            | 408 St. Peter Street Site<br>220<br><br>St. Paul,<br>MN<br>55102                    | Electronic Service | No                | SPL_SL_15-<br>826_Potentially Interested<br>Parties |
| James D.   | Larson    | james.larson@avantenergy.com    | Avant Energy Services                   | 220 S 6th St Site 1300<br><br>Minneapolis,<br>MN<br>55402                           | Electronic Service | No                | SPL_SL_15-<br>826_Potentially Interested<br>Parties |
| Peder      | Larson    | plarson@larkinhoffman.com       | Larkin Hoffman Daly &<br>Lindgren, Ltd. | 8300 Norman Center Drive<br>Suite 1000<br>Bloomington,<br>MN<br>55437               | Electronic Service | No                | SPL_SL_15-<br>826_Potentially Interested<br>Parties |
| Douglas    | Larson    | dlarson@dakotaelectric.com      | Dakota Electric Association             | 4300 220th St W<br><br>Farmington,<br>MN<br>55024                                   | Electronic Service | No                | SPL_SL_15-<br>826_Potentially Interested<br>Parties |
| John       | Lindell   | agorud.ecf@ag.state.mn.us       | Office of the Attorney<br>General-RUD   | 1400 BRM Tower<br>445 Minnesota St<br>St. Paul,<br>MN<br>55102130                   | Electronic Service | Yes               | SPL_SL_15-<br>826_Potentially Interested<br>Parties |
| Matthew P  | Loftus    | matthew.p.loftus@xcelenergy.com | Xcel Energy                             | 414 Nicollet Mall FL 5<br><br>Minneapolis,<br>MN<br>55401                           | Electronic Service | No                | SPL_SL_15-<br>826_Potentially Interested<br>Parties |
| Paula      | Maccabee  | Pmaccabee@justchangela.w.com    | Just Change Law Offices                 | 1961 Selby Ave<br><br>Saint Paul,<br>MN<br>55104                                    | Electronic Service | No                | SPL_SL_15-<br>826_Potentially Interested<br>Parties |
| Peter      | Madsen    | peter.madsen@ag.state.mn.us     | Office of the Attorney<br>General-DOC   | Bremer Tower, Suite 1800<br>445 Minnesota Street<br>St. Paul,<br>Minnesota<br>55101 | Electronic Service | Yes               | SPL_SL_15-<br>826_Potentially Interested<br>Parties |

| First Name | Last Name | Email                          | Company Name                        | Address   | Delivery Method    | View Trade Secret | Service List Name                            |
|------------|-----------|--------------------------------|-------------------------------------|---|--------------------|-------------------|--|
| Philip     | Mahowald  | pmahowald@piic.org             | Prairie Island Indian Community     | 5636 Sturgeon Lake Rd<br>Welch,<br>MN<br>55089                        | Electronic Service | No                | SPL_SL_15-826_Potentially Interested Parties |
| Kavita     | Maini     | kmairi@wi.rr.com               | KM Energy Consulting LLC            | 961 N Lost Woods Rd<br>Oconomowoc,<br>WI<br>53066                     | Electronic Service | No                | SPL_SL_15-826_Potentially Interested Parties |
| Pam        | Marshall  | pam@energycents.org            | Energy CENTS Coalition              | 823 7th St E<br>St. Paul,<br>MN<br>55106                              | Electronic Service | No                | SPL_SL_15-826_Potentially Interested Parties |
| Mary       | Martinka  | mary.a.martinka@xcelenergy.com | Xcel Energy Inc                     | 414 Nicollet Mall<br>7th Floor<br>Minneapolis,<br>MN<br>55401         | Electronic Service | No                | SPL_SL_15-826_Potentially Interested Parties |
| Natalie    | McIntire  | natalie.mcintire@gmail.com     | Wind on the Wires                   | 570 Asbury St Ste 201<br>Saint Paul,<br>MN<br>55104-1850              | Electronic Service | No                | SPL_SL_15-826_Potentially Interested Parties |
| Connor     | McNellis  | N/A                            | Larkin Hoffman Daly & Lindgren Ltd. | 8300 Norman Center Drive<br>Suite 1000<br>Minneapolis,<br>MN<br>55437 | Paper Service      | No                | SPL_SL_15-826_Potentially Interested Parties |
| Brian      | Meloy     | brian.meloy@stinson.com        | Stinson, Leonard, Street LLP        | 150 S 5th St Ste 2300<br>Minneapolis,<br>MN<br>55402                  | Electronic Service | Yes               | SPL_SL_15-826_Potentially Interested Parties |
| David      | Moeller   | dmoeller@allete.com            | Minnesota Power                     | 30 W Superior St<br>Duluth,<br>MN<br>558022093                        | Electronic Service | No                | SPL_SL_15-826_Potentially Interested Parties |
| Andrew     | Moratzka  | apmoratzka@stoel.com           | Stoel Rives LLP                     | 33 South Sixth Street<br>Suite 4200<br>Minneapolis,<br>MN<br>55402    | Electronic Service | Yes               | SPL_SL_15-826_Potentially Interested Parties |
| Carl       | Nelson    | crnelson@mncee.org             | Center for Energy and Environment   | 212 3rd Ave N Ste 560<br>Minneapolis,<br>MN<br>55401                  | Electronic Service | No                | SPL_SL_15-826_Potentially Interested Parties |

| First Name | Last Name | Email                          | Company Name                         | Address  | Delivery Method    | View Trade Secret | Service List Name                                   |
|------------|-----------|--------------------------------|--------------------------------------|--|--------------------|-------------------|---|
| David W.   | Niles     | david.niles@avantenergy.com    | Minnesota Municipal Power Agency     | Suite 300<br>200 South Sixth Street<br>Minneapolis,<br>MN<br>55402 | Electronic Service | No                | SPL_SL_15-<br>826_Potentially Interested<br>Parties |
| Rolf       | Nordstrom | mordstrom@gpisd.net            | Great Plains Institute               | 2801 21ST AVE S STE 220<br><br>Minneapolis,<br>MN<br>55407-1229    | Electronic Service | No                | SPL_SL_15-<br>826_Potentially Interested<br>Parties |
| Carol A.   | Overland  | overland@legalelectric.org     | Legalelectric - Overland Law Office  | 1110 West Avenue<br><br>Red Wing,<br>MN<br>55066                   | Electronic Service | No                | SPL_SL_15-<br>826_Potentially Interested<br>Parties |
| Kevin      | Reuther   | kreuther@mncenter.org          | MN Center for Environmental Advocacy | 26 E Exchange St, Ste 206<br><br>St. Paul,<br>MN<br>551011667      | Electronic Service | Yes               | SPL_SL_15-<br>826_Potentially Interested<br>Parties |
| Enio       | Ricci     | erici@inveneryllc.com          | Invenery LLC                         | 17830 New Hampshire Ave<br>Ste 300<br><br>Ashton,<br>MD<br>20861   | Electronic Service | No                | SPL_SL_15-<br>826_Potentially Interested<br>Parties |
| Amanda     | Rome      | amanda.rome@xcelenergy.com     | Xcel Energy                          | 414 Nicollet Mall FL 5<br><br>Minneapolis,<br>MN<br>55401          | Electronic Service | No                | SPL_SL_15-<br>826_Potentially Interested<br>Parties |
| Michelle   | Rosier    | michelle.rosier@sierraclub.org | Sierra Club                          | 2327 E. Franklin Avenue<br><br>Minneapolis,<br>MN<br>554061024     | Electronic Service | No                | SPL_SL_15-<br>826_Potentially Interested<br>Parties |
| Richard    | Saveikoul | rsaveikoul@martinsquires.com   | Martin & Squires, P.A.               | 332 Minnesota Street Ste<br>W2750<br><br>St. Paul,<br>MN<br>55101  | Electronic Service | Yes               | SPL_SL_15-<br>826_Potentially Interested<br>Parties |
| Larry L.   | Schedin   | Larry@LLSResources.com         | LLS Resources, LLC                   | 12 S 6th St Ste 1137<br><br>Minneapolis,<br>MN<br>55402            | Electronic Service | No                | SPL_SL_15-<br>826_Potentially Interested<br>Parties |

| First Name  | Last Name      | Email                               | Company Name                               | Address   | Delivery Method           | View Trade Secret | Service List Name                                   |
|-------------|----------------|-------------------------------------|--|---|---------------------------|-------------------|---|
| Christopher | Schoenherr     | cp.schoenherr@smmpa.org             | SMMPA                                      | 500 First Ave SW<br>Rochester,<br>MN<br>55902-3303                    | Electronic Service        | No                | SPL_SL_15-<br>826_Potentially Interested<br>Parties |
| Matthew J.  | Schuerg P.E.   | mjsreg@earthlink.net                | Energy Systems Consulting<br>Services, LLC | PO Box 16129<br>St. Paul,<br>MN<br>55116                              | Electronic Service        | No                | SPL_SL_15-<br>826_Potentially Interested<br>Parties |
| Janet       | Shaddix Eiling | jshaddix@janetshaddix.com           | Shaddix And Associates                     | Ste 122<br>9100 W Bloomington<br>Bloomington,<br>MN<br>55431          | Electronic Service<br>Fwy | Yes               | SPL_SL_15-<br>826_Potentially Interested<br>Parties |
| David       | Shaffer        | shaff081@gmail.com                  | MnSEIA                                     | 2952 Beechwood AVE<br>Beechwood Ave,<br>Wayzata<br>55391              | Electronic Service        | No                | SPL_SL_15-<br>826_Potentially Interested<br>Parties |
| Patricia    | Sharkey        | psharkey@environmentalawcounsel.com | Midwest Cogeneration<br>Association.       | 180 N. LaSalle Street<br>Suite 3700<br>Chicago,<br>Illinois<br>60601  | Electronic Service        | No                | SPL_SL_15-<br>826_Potentially Interested<br>Parties |
| Doug        | Shoemaker      | dougs@mnRenewables.org              | MPRES                                      | 2928 5th Ave S<br>Minneapolis,<br>MN<br>55408                         | Electronic Service        | No                | SPL_SL_15-<br>826_Potentially Interested<br>Parties |
| Sara        | Smith          | sara.smith@metc.state.mn.us         | Metropolitan Council                       | 390 Robert St N<br>St. Paul,<br>MN<br>55101-1805                      | Electronic Service        | No                | SPL_SL_15-<br>826_Potentially Interested<br>Parties |
| Ken         | Smith          | ken.smith@districtenergy.com        | District Energy St. Paul Inc.              | 76 W Kellogg Blvd<br>St. Paul,<br>MN<br>55102                         | Electronic Service        | No                | SPL_SL_15-<br>826_Potentially Interested<br>Parties |
| Cari        | Snaza          | cari.snaza@state.mn.us              | Office of Administrative<br>Hearings       | PO Box 64620<br>St. Paul,<br>MN<br>55155                              | Electronic Service        | No                | SPL_SL_15-<br>826_Potentially Interested<br>Parties |
| Ron         | Spangler, Jr.  | rispangler@otpc.com                 | Otter Tail Power Company                   | 215 So. Cascade St.<br>PO Box 496<br>Fergus Falls,<br>MN<br>565380496 | Electronic Service        | No                | SPL_SL_15-<br>826_Potentially Interested<br>Parties |

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|------------|-------------|-----------------------------------|--------------------------------|--|--------------------|-------------------|---|
| Byron E.   | Starns      | byron.starns@stinson.com          | Stinson Leonard Street LLP     | 150 South 5th Street<br>Suite 2300<br>Minneapolis,<br>MN<br>55402                    | Electronic Service | No                | SPL_SL_15-<br>826_Potentially Interested<br>Parties |
| James M.   | Strommen    | jstrommen@kennedy-graven.com      | Kennedy & Graven,<br>Chartered | 470 U.S. Bank Plaza<br>200 South Sixth Street<br>Minneapolis,<br>MN<br>55402         | Electronic Service | No                | SPL_SL_15-<br>826_Potentially Interested<br>Parties |
| Eric       | Swanson     | eswanson@winthrop.com             | Winthrop Weinstine             | 225 S 6th St Ste 3500<br>Capella Tower<br>Minneapolis,<br>MN<br>554024629            | Electronic Service | No                | SPL_SL_15-<br>826_Potentially Interested<br>Parties |
| Thomas P.  | Sweeney III | tom.sweeney@easycleanenergy.com   | Clean Energy Collective        | P O Box 1828<br>Boulder,<br>CO<br>80306-1828   | Electronic Service | No                | SPL_SL_15-<br>826_Potentially Interested<br>Parties |
| SaGonna    | Thompson    | Regulatory.records@xcelenergy.com | Xcel Energy                    | 414 Nicollet Mall FL 7<br>Minneapolis,<br>MN<br>554011993                            | Electronic Service | Yes               | SPL_SL_15-<br>826_Potentially Interested<br>Parties |
| Erick      | Van Meter   | evanmete@umn.edu                  | University of Minnesota        | N/A  | Electronic Service | No                | SPL_SL_15-<br>826_Potentially Interested<br>Parties |
| Lisa       | Veith       | lisa.veith@ci.stpaul.mn.us        | City of St. Paul               | 400 City Hall and<br>Courthouse<br>15 West Kellogg Blvd.<br>St. Paul,<br>MN<br>55102 | Electronic Service | No                | SPL_SL_15-<br>826_Potentially Interested<br>Parties |
| John       | Wachtler    | jwachtler@barr.com                | Barr Engineering Co.           | 4700 West 77th Street<br>Minneapolis,<br>MN<br>554354803                             | Electronic Service | No                | SPL_SL_15-<br>826_Potentially Interested<br>Parties |
| Scott M.   | Wilensky    | scott.wilensky@xcelenergy.com     | Xcel Energy                    | 7th Floor<br>414 Nicollet Mall<br>Minneapolis,<br>MN<br>554011993                    | Electronic Service | No                | SPL_SL_15-<br>826_Potentially Interested<br>Parties |
| Jason      | Willlett    | jason.willett@metc.state.mn.us    | Metropolitan Council           | 390 Robert St N<br>Saint Paul,<br>MN<br>55101-1805                                   | Electronic Service | No                | SPL_SL_15-<br>826_Potentially Interested<br>Parties |

| First Name | Last Name | Email                     | Company Name                                 | Address   | Delivery Method    | View Trade Secret | Service List Name                                   |
|------------|-----------|---------------------------|--|---|--------------------|-------------------|---|
| Samantha   | Williams  | swilliams@nrdc.org        | Natural Resources Defense Council            | 20 N. Wacker Drive<br>Ste 1600<br>Chicago,<br>IL<br>60606       | Electronic Service | No                | SPL_SL_15-<br>826_Potentially Interested<br>Parties |
| Daniel P   | Wolf      | dan.wolf@state.mn.us      | Public Utilities Commission                  | 121 7th Place East<br>Suite 350<br>St. Paul,<br>MN<br>551012147 | Electronic Service | Yes               | SPL_SL_15-<br>826_Potentially Interested<br>Parties |
| Patrick    | Zomer     | Patrick.Zomer@lawmoss.com | Moss & Barnett a<br>Professional Association | 150 S. 5th Street, #1200<br>Minneapolis,<br>MN<br>55402         | Electronic Service | No                | SPL_SL_15-<br>826_Potentially Interested<br>Parties |