

STATE OF MINNESOTA
BEFORE THE PUBLIC UTILITIES COMMISSION

Katie Sieben	Chair
Joseph K. Sullivan	Vice-Chair
Hwikwon Ham	Commissioner
Audrey Partridge	Commissioner
John Tuma	Commissioner

**In the Matter of the Petition of Northern States
Power Company for Approval of Capacity*Connect
A Distributed Capacity Procurement Program**

PUC Docket No. E-002/M-25-378

COMMENTS OF THE R STREET INSTITUTE

The R Street Institute (R Street) submits these comments in response to the Notice of Comment Period issued by the Minnesota Public Utilities Commission (Commission or PUC) on Oct. 16, 2025.¹ R Street appreciates the opportunity to offer its perspectives on this topic as the Commission considers approving Xcel Energy’s Capacity*Connect (C*C) program. The comments provided do not address all questions raised in the Commission’s Notice; however, R Street may address them in response to other initial comments filed.

Introduction

The proceeding was initiated pursuant to the Commission approving a settlement in the Xcel Energy Integrated Resource Plan (IRP) proceeding whereby Xcel would submit a proposal to implement a Distributed Capacity Procurement (DCP) proposal.² The initial DCP proposal as outlined in Xcel’s IRP would allow Xcel to source, develop, install, and control certain types of distributed energy resources (DER). The Commission’s IRP Order directed Xcel to submit a more detailed version of that proposal along with additional requirements, including a deeper discussion on the purpose and use of a Distributed Energy Resources Management System (DERMS).

The initial DCP filing, now christened “C*C,” is the subject of this docket. As described in more detail below, R Street recommends that the Commission reject Xcel’s filing. In the event the Commission decides it is interested in continuing the C*C proposal, R Street provides several recommendations to

¹ *In the Matter of Northern States Power Company, dba Xcel Energy, Petition for Approval of Capacity*Connect, a Distributed Capacity Procurement (DCP) program, “Notice of Comment Period,”* Docket No. E002/M-25-378 (Oct. 16, 2025) (Notice). The Commission issued an order on November 21, 2025 extending the comment period to December 10, 2025.

² *In the Matter of Xcel Energy’s 2023 Integrated Distribution Plan, Order Accepting 2023 Integrated Distribution Plan and Modifying Reporting Requirements,* Docket No. E002/M-23-452 (Sept. 16, 2024).

improve it and recommends that Xcel refile the proposal after completion of Phase 1 of C*C and in response to the recommendations of R Street. At a minimum, the Commission must ensure Xcel does not exercise monopoly power at the expense of other competitive and potentially lower-cost alternatives, including by prohibiting utility ownership of Distributed Energy Resources (DER). Furthermore, Xcel's proposal fails to describe the costs, goals, organization, or operation of this proposal adequately. Considering the substantial cost, the Commission must not delegate to Xcel the sole responsibility of carrying out such an ill-defined proposal. Lastly, R Street is concerned that the role and use of DERMS is not adequately described, nor does Xcel put DERMS in the broader context of its broader grid modernization initiatives, including the potential for a distribution system operator or how it fits in an atmosphere where its underlying grid architecture should be evolving along with technological changes.

About R Street Institute

R Street is a leading think tank focused on solving complex public policy challenges through free markets and limited, effective government. R Street consistently offers pragmatic, real solutions that foster American innovation and prosperity through competition and safeguard individual liberty—all with an understanding that life in a democratic society sometimes means reaching compromises that don't necessarily represent first, best solutions.

Responses to Commission Notice

The Notice identified six questions to help guide stakeholders in developing an adequate record for Commission deliberations. R Street is happy to provide its responses to these questions.

Question 1: Should the Commission approve, modify, or deny Xcel's proposal for Capacity*Connect Phase 2?

Xcel describes its proposal as “an innovative step on the pathway of building the grid of the future that supports the clean energy transition and meets our customers’ growing needs and expectations.”³ It continues that the C*C proposal is a direction that represents how utilities “are beginning to incorporate distributed energy resources into system planning and operations.”⁴ As envisioned by Xcel, C*C assets could be used for a variety of future purposes, including to offset peak load, mitigate curtailment of renewables and support more renewables on the system, meet bulk system capacity needs and participate in Midcontinent Independent System Operator (MISO) markets, and more.”⁵ This future also includes identification of “processes, tools, and capabilities that may allow us to co-optimize benefits between the bulk system and distribution system.”⁶

³ *In the Matter of Northern States Power Company, dba Xcel Energy, Petition for Approval of Capacity*Connect, a Distributed Capacity Procurement (DCP) Program*, Petition, Docket No. E002/M-25-378 at 3 (Oct. 3, 2025) (Petition). <https://efiling.web.commerce.state.mn.us/documents/%7B3012AC99-0000-CA1D-8FD5-D4058854BAFF%7D/download?contentSequence=0&rowIndex=40>.

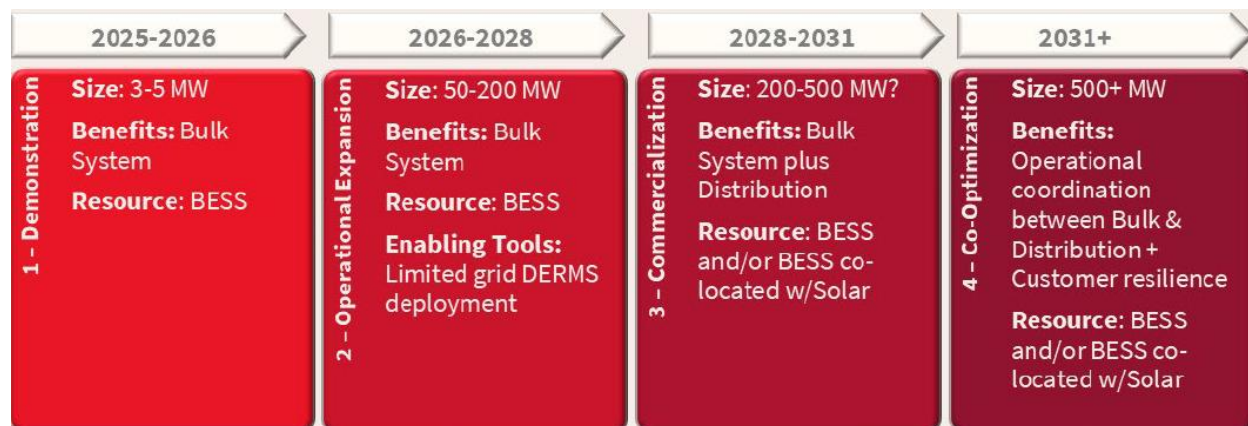
⁴ *Id.*

⁵ *Id.*

⁶ *Id.*

This proposal is the second step in Xcel’s vision of the C*C program. As shown in Figure 1, the vision for this program goes out six years.⁷ Phase 1 was the subject of a proceeding before the Department of Commerce earlier this year.⁸ The instant application covers Phase 2, which proposes between 50-200 megawatts (MW) of front-of-the-meter energy storage systems and an initial limited deployment of a DERMS.

Figure 1: Conceptual C*C Roadmap



To implement Phase 2, Xcel requests that the Commission approve the following:

- Deployment of approximately 50 MW and up to 200 MW of Company-owned and -operated distribution-interconnected battery energy storage systems (BESS) by the end of 2028.
- A budget range of approximately \$152 million (corresponding to the planned 50 MW deployment) to approximately \$430 million (estimated for a 200 MW deployment) through 2028.
- Quarterly status reporting until an Interim Program Assessment is filed after commercial operation of 20 MW or two years from Phase 2 approval, whichever is sooner.
- Implementation of a limited deployment of a grid DERMS to support C*C and inform the Company’s requirements for a future Enterprise DERMS.
- The Company’s proposal to seek recovery of C*C costs in the Renewable Energy Standard (RES) Rider.⁹

The application covers additional details including the role of Sparkfund in implementing this proposal, the alignment with MISO markets, the choice and operation of projects for the C*C program, and information about Xcel’s DERMS proposal. Of note, Phase 2 of C*C seeks to deploy 50 to 200 MW of front-of-the-meter energy storage with each storage system sized 1 to 3 MWs.

⁷ *Id.* at 5.

⁸ See *Assistant Commissioner’s Decision Addenda in Response to Xcel Energy’s Proposed Modifications to its 2024-2026 Energy Conservation and Optimization Triennial Plan* (Docket Nos. E,G002/CIP-23-92 & E002/RP-24-67) (Sept. 3, 2025).

⁹ Petition at 9.

The location of these projects are to prioritize “high-value bulk system use cases” and be located at “strategically targeted feeders.”¹⁰ In essence, this phase “will primarily seek to maximize bulk system benefits” but will not provide distribution or customer benefits.¹¹ According to Xcel, the primary benefits of this phase of the C*C are MISO capacity resources and engagement in energy arbitrage.¹²

Xcel has chosen Sparkfund to help implement this program.¹³ The two companies will work together on the following items:

- Program Design
- Site Selection
- Procurement
- Project Management
- Data and Analytics
- Operations and Maintenance¹⁴

To identify potential locations for the siting of an energy storage system, Xcel will give Sparkfund access to information about Xcel’s grid. This also includes developing a minimum set of criteria to determine appropriate feeders, which includes a minimum of 1 MW of available generation hosting capacity and does not serve critical customers.¹⁵ To ensure its projects are successful, Xcel proposes that they be allowed to skip Minnesota’s interconnection process, including skipping ahead of other projects already in the queue.¹⁶

Once Xcel has identified the list of feeders, it will determine which commercial and industrial customers are eligible to participate in the program.¹⁷ Sparkfund will then market to those customers to inform them about the opportunity to host Xcel-owned energy storage systems at their site.¹⁸ Those who agree to host an energy storage system will receive regular compensation from Xcel.¹⁹

Xcel provides details regarding the procurement of the energy storage systems by Sparkfund.²⁰ However, much of this section—including procurement details—is filed under seal. While R Street is not submitting a motion to make this information public, R Street encourages the Commission to consider whether this information warrants being filed under seal and whether Xcel has met the burden of proof for doing so.

¹⁰ *Id.* at 13.

¹¹ *Id.*

¹² *Id.* at 14.

¹³ *Id.* at 19.

¹⁴ *Id.*

¹⁵ *Id.* at 17-18.

¹⁶ *Id.* at 18. *See also*, Xcel Response to Staff Information Request No. 5 at 2-3.

¹⁷ Petition at 17-18.

¹⁸ *Id.* at 20.

¹⁹ *Id.*

²⁰ *Id.* at 21-26.

To implement this phase, Xcel proposes a three-year deployment of 50 to 200 MW at a cost of \$152 million to \$430 million.²¹ Taken altogether, the overall cost-benefit analysis shows that the project is not cost-effective as proposed (see Figure 2).²²

Figure 2: C*C Phase 2 Benefit-to-Cost

	\$ NPV millions
<i>Benefits</i>	
Production Cost Savings	39.28
Capacity / Resource Adequacy	289.00
Avoided Distribution Benefit	41.69
Avoided Transmission Line Loss	7.07
Avoided Transmission Benefit	62.53
<i>Total Benefits</i>	<i>439.56</i>
<i>Costs</i>	
Capital Expenses	288.58
O&M Expenses	252.35
Investment Tax Credits	(82.88)
<i>Total Costs</i>	<i>458.05</i>
Benefit/Cost Ratio (BCR)	0.96

R Street’s primary recommendation is to reject this application as filed. R Street appreciates Xcel’s interest in utilizing and integrating DER to meet system needs; however, the proposal as filed would only benefit Xcel, not customers. R Street supports a truly competitive solicitation process that is fair and equitable and gives all customers and developers an opportunity to participate and provide services to Xcel. Using a middleman (Sparkfund) to do the majority of the work and allowing them to access information otherwise unavailable to others is a wildly improper use of monopoly power.

R Street’s response follows the request of the Commission to address the following topics.

a. Program design, implementation, and operations

R Street has significant concerns about the program design, implementation, and operations of the C*C as proposed. While R Street is encouraged by Xcel’s initial effort to identify the benefits and utilization of DER, the proposal has significant flaws.

Xcel describes the C*C program as “novel” and “innovative,” yet R Street is unaware of any prohibitions on Xcel from proposing to install utility-owned storage at any point in the past.²³ Further, R Street has

²¹ *Id.* at 29.

²² *Id.* at 35.

²³ See, e.g., *In the Matter of Xcel Energy’s Petition for a Long-Duration Energy Storage System Pilot Project at Sherco*, Docket No. 23-119 (filed March 6, 2023); *In the Matter of Xcel Energy’s 2024 Wind, Solar, Storage, and Hybrid Request for Proposals*, Docket No. 24-230 (filed Oct.31, 2025); *In the Matter of the Application of the Application of Northern States Power Company D/B/A Xcel Energy for an up to 600 MW Battery Energy Storage*

concerns about Xcel ownership of these resources. R Street does not believe that ownership of these resources by the monopoly is appropriate or beneficial to customers. As proposed, Xcel and its partner, Sparkfund, are leveraging information that is available only to them. This decision automatically and arbitrarily allows Xcel to leverage monopoly power against any potential competitor who could offer the same services to Xcel (or into MISO markets) but for Xcel's monopoly power. The proposal provides no evidence that third parties could not already provide the same or similar services to Xcel or directly into the MISO marketplace. Indeed, the Commission's failure to remove the existing prohibition on aggregators enables Xcel to use and aggregate front-of-the-meter energy storage systems and participate in MISO markets.²⁴ While MISO's implementation of FERC Order No. 2222 (currently scheduled to begin in 2029), allows for DER, Order No. 2222 explicitly excludes demand response because demand response aggregators (or aggregations of retail customers) were addressed in FERC Order Nos. 719 and 745. In other words, Minnesota customers could have been benefiting from this same service – demand response – since 2013 with the finalization of Order No. 745.

Furthermore, another Xcel distribution company, Public Service Company of Colorado (PSCo), has proposed something more innovative: an Aggregated Virtual Power Plan (AVPP) program. Still under final review by the Colorado Public Utilities Commission, the program would procure more DER at a lower total cost and allow eligible aggregators to provide VPP services to PSCo through a tariffed program (and a future competitive procurement mechanism) for up to 125 MW.²⁵ As described by PSCo, the AVPP program is "intended to encourage DER adoption that benefits all customers."²⁶ PSCo agreed to a settlement stating it will not participate in its own aggregator program.²⁷

As previously noted, R Street does not believe it is appropriate for Xcel to leverage its monopoly power against potential competitors who could provide the same or similar services. As explained in its proposal, Xcel will identify feeders with available hosting capacity and work with Sparkfund to identify and market to those customers. This is extremely unfair to developers who could provide the same service, work with customers to site storage (or solar+storage) resources, and manage customer

System Site Permit for the Sherco South & West Battery Energy Storage Project in Sherburne County, Minnesota, Docket No. 25-319 (filed Dec. 5, 2025).

²⁴ *In the Matter of a Commission Investigation into the Potential Role of Third-Party Aggregation of Retail Customers*, Docket No. 22-600. At the Commission's Aug. 24, 2023 Agenda Meeting, the majority of commissioner's voted to table further discussion on the docket.

<https://efiling.web.commerce.state.mn.us/documents/%7BE0DEA78A-0000-C230-8612-E8F74B439EB0%7D/download?contentSequence=0&rowIndex=12>.

²⁵ *In the Matter of the Application of Public Service Company of Colorado for Approval of its 2025-2029 Distribution System Plan and the Grid Modernization Clause*, AVPP Program Settlement Agreement, Proceeding No. 24A-0547E (Aug. 15, 2025).

https://www.dora.state.co.us/pls/efi/efi_p2_v2_demo.show_document?p_dms_document_id=1047669&p_session_id=

²⁶ *In the Matter of the Application of Public Service Company of Colorado for Approval of its 2025-2029 Distribution System Plan and the Grid Modernization Clause*, Settlement Testimony of Zachary D. Pollock, Proceeding No. 24A-0547E (Aug. 15, 2025).

https://www.dora.state.co.us/pls/efi/efi_p2_v2_demo.show_document?p_dms_document_id=1047673&p_session_id=

²⁷ AVPP Settlement at 5.

demands to provide direct benefits. As it stands, information about customers on identified feeders (including load shapes) will only be available to Sparkfund as the program implementer. The addition of Sparkfund is an added cost to the program—one that could be avoided entirely if the program were competitively procured like PSCo's AVPP, where those costs would be borne by the developer rather than Xcel's customers.

While Xcel treats its monopoly power as a feature of the program, the Commission should treat this, instead, as a bug- this does not benefit customers in any way. Indeed, Xcel's own description of the program's design notably excludes any benefit to customers, be it the site host or its ratebase. Additionally, by seeking to site energy storage systems only at locations with over 1 MW of generation hosting capacity, Xcel has purposely avoided using C*C to alleviate existing constraints on both its own system and the MISO system, where it could be much more valuable.²⁸

This application seeks Commission approval for Phase 2 of its C*C proposal. As Xcel explains, Phase 1 was approved by the Department of Commerce in September 2025. A final report "summarizing project outcomes, operational insights, and recommendations for future phases" will be submitted by Xcel on April 1, 2028 as part of its 2027 Energy Conservation and Optimization Status Report.²⁹ Xcel submitted this application barely a month after receiving this approval. R Street is concerned that this filing may be premature, considering that Xcel is only at the very beginning of implementing Phase 1. As such, there are many assumptions in this application that rely upon a successful Phase 1 implementation. Because the program's success will not be known until the end of 2027, the Commission has time to consider whether the contents of this proposal are reasonable and in the public interest rather than an unfair exercise of monopoly power. While R Street recommends rejecting the proposal as written, it also provides recommendations for improvement. Additionally, instead of rushing to a decision, the Commission should first consider alternatives to utility ownership. More detailed recommendations appear later on in these comments.

Lastly, R Street sees no reasonable rationale for this program not to be competitively sourced and procured. While Xcel touts the purported benefits of utility-owned resources, other states have decided utility ownership is not in the public interest. For example, electric utilities in Maryland proposed a single third-party implementer for VPP projects before the Maryland Public Service Commission. In rejecting the utilities' proposals, the Maryland Commission noted that "[a]ggregators can allow for broader DER participation while also simplifying utility management" of the utility proposals.³⁰ It also directed utilities to "revise their pilot programs to allow for aggregator participation" in order to "achieve broader

²⁸ R Street also notes that it is unclear exactly which price Xcel intends to arbitrage against (the Xcel zonal price or the MISO elemental pricing node at a specific location). R Street suspects it is the former, which further points against Xcel's cost-benefit analysis and overall benefit of the program since storage could then be placed anywhere across its territory and arbitrage against the zonal price while providing zero benefits to constraints or system need.

²⁹ Petition at 7.

³⁰ *DRIVE Act Implementation*, "Order on DRIVE Act Implementation Proposals," Order No. 91917, Case No. 9761, before the Public Service Commission of Maryland at 37 (Oct. 21, 2025). https://www.psc.state.md.us/wp-content/uploads/Order-91917_ML-323522-9761-1.pdf

participation to greater scale and greater program diversity.”^{31,32} The Commission should likewise require Xcel to utilize competitively procured DER from aggregators and expand its program to include residential and behind-the-meter solutions in future phases. As noted above, the final Phase 1 report is not due until April 2028, meaning the Commission has time to direct Xcel to submit an updated plan with greater reliance on truly competitively procured services.

b. Delivery of system benefits

As noted by Xcel, the C*C program is not cost-effective as proposed. While R Street recognizes that the lack of a positive business case does not automatically mean a program is not worthwhile, the Commission should pause to consider whether the program is reasonable and in the public interest. As noted above, R Street is concerned that the benefits under consideration do not align closely with actual needs, are not located in areas where energy storage could provide immediate benefits to the system, and do not provide site hosts with anything other than the hosting payment. R Street believes there are numerous developers and aggregators more than willing to provide Xcel with such services and participate in MISO markets if Xcel were to make C*C a truly competitive program.

In response to discovery, Xcel notes that “[g]rid congestion relief is one of many potential use cases” for the C*C program but that they intend to focus only on “bulk system benefits” to start.³³ According to Xcel, assets procured via C*C will be utilized and recovered over 20 years. The proposal also assumes site hosts will be paid for the entirety of that period.³⁴ Considering the changes already occurring across the electric system, R Street is concerned that a 20-year lifespan is too optimistic and urges the Commission to consider reducing the expected lifespan of these assets.³⁵ In essence, Xcel is asking this Commission to accept a bet that utility-owned and operated DER—funded by ratepayers—is a more effective and efficient solution than allowing a competitive market to develop wherein Xcel procures services for a shorter period of time. To the extent that competitors can also participate in MISO markets (allowable under FERC Order Nos. 745 and 2222), then there is no justification for the limited set of benefits described in this proposal. Considering what is occurring in other jurisdictions and what FERC allows to occur, the Commission should expand the proposal to include more benefits that aggregators and others can provide. Waiting until MISO implements Order No. 2222 is unreasonable considering that customers could have been participating in MISO markets enabled by Order No. 745. The program’s limited benefits, limited size, and lack of cost-effectiveness runs the risk of Xcel’s ratebase being on the hook for an expensive set of technologies spanning 20 years.

³¹ *Id.* at 39, 48. R Street notes that the Maryland Order covers several topics also at issue in this docket. For example, the Maryland Commission found that the utility proposals addressing system peak reduction only were too limited and directed the utilities to consider local and distribution needs as well.

³² *Id.* at 38.

³³ Xcel Energy Response to Information Request No. 4 of the Minnesota Solar Energy Industries Association, Docket No. E002/M-25-378 (Nov. 5, 2025).

³⁴ Xcel Energy Response to Information Request No. 7 of the Minnesota Solar Energy Industries Association, Docket No. E002/M-25-378 (Nov. 5, 2025).

³⁵ Xcel Energy Response to Information Request No. 11 of the Minnesota Solar Energy Industries Association, Docket No. E002/M-25-378 (Nov. 5, 2025).

c. Reporting

R Street takes no position on this topic but reserves the opportunity to do so via reply or supplemental comments.

d. Budget

The program budget provided by Xcel details the three-year costs of the program. The budget covers the cost of the energy storage, operations and maintenance of the energy storage equipment, implementing a limited Grid DERMS, program management, and payments to the site hosts. For the three years of the program, this totals \$430 million for up to 200 MW deployment.³⁶

R Street notes that PSCo's AVPP program has an estimated cost of \$624 per kilowatt (kW) for 125 MW, whereas the C*C program has an estimated cost of \$2,150 per kW for 200 MW.³⁷ It is R Street's perspective that these program costs are unreasonable. R Street supports the Maryland Commission's determination that competitively procured services are a more cost-effective means of meeting program goals; similarly, Xcel can avoid the majority of these costs if it adopts a competitively procured model rather than the single implementer and utility ownership model. Furthermore, PSCo's AVPP settlement allows for a future opportunity for a competitive procurement up to 5 MWs, stating that "a competitive bidding process could help induce competition that reduces costs for customers."³⁸ Considering the cost of the program as proposed and the relatively limited size of the proposal, R Street recommends that the Commission prohibit utility ownership of these resources and assets as not in the public interest. Instead, R Street recommends the Commission direct that this be a competitively procured program. The information available in this record does not support Xcel's proposal to own these assets, nor does it support ratepayers funding the program as proposed.

Finally, considering that Xcel is considering energy storage systems as 20-year assets, a three-year budget does not provide the Commission with a reasonable record on which to judge whether these costs are reasonable in the short or long term. The record in this docket and the information provided by Xcel offer the Commission just a taste of the costs that customers will ultimately pay via bills.

e. Procurement process

R Street has no additional comments to provide but reserves the opportunity to do so via reply or supplemental comments.

f. Applicability of MNDIP

Recognizing that other stakeholders will provide more detailed comments, R Street would like to address additional points regarding this topic.

³⁶ Petition at 29-30.

³⁷ Xcel Energy Response to Information Request No. 11 of the Minnesota Solar Energy Industries Association.

³⁸ PSCo AVPP Settlement Testimony at 9.

R Street is greatly concerned with Xcel's position that its assets be allowed to skip the MN DIP process entirely and, presumably, jump ahead of other applications in the queue, if any.³⁹ In response to discovery from Commission Staff, Xcel presents the new argument that the energy storage operating under this proposal should be treated more like a grid asset than a DER. In addition, since the energy storage is operating "in a way that would qualify for energy and capacity value in the MISO market," they should also be treated as a bulk system resource. Xcel provides additional context for its position noting that the energy storage systems will be contained within the Area Electric Power System and will not be located in the Local Electric Power System, which is generally the customer facility or premise.

R Street strongly disagrees with Xcel's position. Regardless of Xcel's positioning of any energy storage system, the MN DIP states that an "interconnection customer" is the owner of a DER, which includes the Area EPS Operator (*i.e.*, Xcel) that proposes to interconnect with the distribution system.⁴⁰ As noted above, R Street is already concerned about Xcel exercising monopoly power against potential competitors via its ability to leverage grid and customer data information and knowledge, but here, Xcel is providing itself with another exercise of monopoly power by defining DER in a way that only it can do and only it can benefit from. R Street believes Xcel is trying to mislead the Commission regarding its relationship with the site hosts. Xcel, via Sparkfund, will definitely have a contract with a site host, if for nothing else, the siting of an energy storage system on the premise of a customer. As such, R Street believes that that would constitute a "customer-sited" resource and would have a point of common coupling with Xcel. What is missing in this discussion is an actual description of where the energy storage systems will be sited relative to service drops or other utility infrastructure on the customer premises or facilities. While the Point of Common Coupling may be the meter, it may also be the transformer or occur at another point on the grid. R Street is concerned that if the Commission approves Xcel's exemption from the MN DIP and adopts Xcel's distinction, this would cause significant harm to the future development of DER in Minnesota. This would essentially allow Xcel to overrun a process that was thoughtfully managed by the Commission and resulted in a process that was largely agreed upon by all parties to the process. If Xcel is allowed to place energy storage systems, or DER generally, anywhere on a customer's premise or facility, that is front-of-the-meter then it would have substantial leverage against competitors who would have to go through the MN DIP process. This would be an abuse of Xcel's monopoly power and one the Commission should reject outright. R Street recommends that the Commission reject Xcel's position that its projects be exempt from the MN DIP.

g. Impact on other programs, such as distribution upgrade cost sharing

R Street has no response to provide but reserves the opportunity to do so via reply or supplemental comments.

³⁹ Petition at 18; Xcel Response to Information Request No. 5 of the Minnesota Public Utilities Commission, Docket No. E002/M-25-378 (Oct. 21, 2025).

⁴⁰ Distributed Energy Resources Interconnection Process, v. 2.4, Glossary of Terms (updated April 24, 2025). https://mn.gov/puc/assets/MN%20DIP%202025%20Clean%20April%2024%202025_tcm14-623149.pdf.

Question 2: Does Xcel's filing fulfill Order Point No. 23 of the Commission's April 21, 2025 Order in Xcel's 2024 Integrated Resource Plan (Docket No. E002/RP-24-67)?

R Street does not believe that Xcel has met the requirement of Order Point 23.c regarding comparison between utility owned and customer/third-party owned resources. Xcel provides no detailed breakdown of costs and benefits if this proposal was either entirely or partially met through a true competitive procurement of services rather than through utility ownership of resources. The only argument presented by Xcel is that its-already-not-cost-effective program would be watered down if they were not allowed to own the resources.⁴¹ Xcel states that “[r]ealizing the full value of C*C depends not only on the underlying assets themselves, but also on the ability to strategically site and effectively integrate them” into Xcel’s planning and operations.⁴² Indeed, “[w]ithout full operational control over the assets, we would not be able to maximize system benefits, which rely on market and operational signals that are core utility functions.”⁴³ R Street strongly disputes this notion.

The program, as proposed here, is proposed to participate in MISO’s Load Modifying Resource (LMR) market product. At a high level, any entity that meets the MISO participation requirements can participate as an LMR- this is nothing unique, on its face, that makes it a core utility function. Furthermore, engaging in arbitrage, as proposed by Xcel, is also not a core utility function as market participants generally can engage in the same activity. That leaves Xcel’s argument regarding ownership and integration with the utility system. Xcel provides zero evidence that this is actually true, much less a cost-benefit analysis. Xcel provides nothing in this filing to justify this position, especially considering the Commission’s own distribution system planning rules envision broader opportunities for DER and for Xcel to operate a more efficient system.⁴⁴ While Xcel states that third party opportunities are available in the procurement of “major equipment supply, design and engineering services, and construction and installation,” this ignores the opportunity for third parties to provide the services itself.⁴⁵

R Street also finds Xcel’s position that it would be more costly curious considering that the costs of the program would go down since Xcel is not seeking to own or build any of the projects. Those costs would be borne by individual customers and developers, who are better suited to manage risk. As explained above, the proposal puts all the risks on Xcel’s customers and all the benefits would flow to Xcel shareholders. This is inequitable.

R Street takes no position on Xcel’s response to the other parts of Ordering Point 23 but reserves the right to do so via reply or supplemental comments on this topic.

⁴¹ Petition at 42.

⁴² *Id.*

⁴³ *Id.*

⁴⁴ *In the Matter of Distribution System Planning for Xcel Energy, et al.*, “Notice of Approval of Updated Filing Requirements,” Docket Nos. E00/CI-18-251, *et al.* (June 2, 2025).

⁴⁵ Petition at 42.

Question 3: Should the Commission approve, modify, or deny Xcel's proposed implementation of a Grid DERMS use case to support Capacity*Connect?

Consistent with R Street's points above, R Street does not believe that a DERMS is needed to implement a truly competitive DER program. R Street recognizes that Xcel would like to control DER and its use of DERMS would facilitate that, however, R Street does not believe that that is the most efficient or economical way of implementing an open DER procurement process. Developers and owners of DER all maintain visibility and control of their DER. The purpose of a DERMS is to provide visibility, communications, and control of a DER or an aggregation of DER. To that end, the addition of a utility DERMS is redundant with what is already in place. Under Xcel's proposal, the DERMS is merely a means to an end of total utility control and ownership of DER that is beyond the role of the utility and extends monopoly power well beyond what is appropriate or needed.

Consistent with R Street's recommendation that this proposal contains numerous flaws that must be addressed before the Commission can adequately adjudicate it, R Street proposes that Xcel investigate a Bring Your Own DERMS solution. Rather than have Xcel ratebase equipment that is drastically more than what is needed to implement this or any DER program, the Commission should ask Xcel to consider utilizing already existing equipment, including DERMS, that can meet the objectives of the program. That is, can developer and aggregator equipment, including their DERMS, be used to provide the utility with the necessary visibility and communications with DER. R Street recognizes that visibility and communications is what is necessary to integrate and utilize DER; it is the control that remains uncertain. The additional benefit of investigating this is to drive standardization and interoperability to the state for DER integration and utilization.

The concept of a bring-your-own-device model is well recognized across the industry, including at Xcel. For example, Xcel provides an opportunity for customers to bring their own device to connect with their smart meters.⁴⁶ Similarly, Xcel operates a Bring Your Own Thermostat program as part of its AC Rewards program.⁴⁷ In this circumstance, for DER where there already is a DERMS or equivalent in place, Xcel should attempt to utilize the existing solutions rather than install new software that would increase costs. By considering a Bring Your Own DERMS, Xcel can outline the technical requirements, leverage existing standards and capabilities, and minimize customer costs without negatively impacting integration or operation of the DER.

Question 4: Does Xcel's DERMS Roadmap in Attachment D of the proposal fulfill Order Point 23 of the Commission's September 16, 2024 Order in Xcel's 2023 Integrated Resource Plan (Docket No. E002/M-23-452)?

R Street takes no position on this topic.

⁴⁶ <https://mn.my.xcelenergy.com/s/forms/sdk-access>.

⁴⁷ <https://mn.my.xcelenergy.com/s/residential/heating-cooling/ac-rewards>.

Question 5: Should the Commission approve, modify, or deny Xcel's request to seek cost recovery of Capacity*Connect and Grid DERMS costs through its Renewable Energy Standard (RES) Rider?

R Street takes no position on this topic beyond what has already been discussed.

Question 6: Are there other issues or concerns related to this matter?

A key consideration for Xcel's ownership of DER under this application is their ability to control and optimize Xcel-owned DER with MISO markets. While R Street's concerns with that position are noted above, it is worth noting that Xcel has previously raised an alternative to this architecture. In its comments in the Commission's recent ARC Docket, Xcel described the potential role of Distribution System Operator (DSO).⁴⁸ R Street continues to support this concept as a more efficient means of managing an increasingly complex distribution system.

Recommendations

R Street recommends that the Commission reject the C*C; however, in the event the Commission seeks to approve the C*C, R Street provides the following recommendations to improve the program:

1. Direct Xcel to fix certain flaws and re-file the C*C proposal within six months of the submission of its 2027 Annual ECO Report;
2. Prohibit Xcel from owning DER under this program;
3. Direct Xcel to provide a behind-the-meter option for participation in C*C;
4. Allow smaller commercial and residential customers to participate in C*C;
5. Direct Xcel to consider a Bring Your Own DERMS solution to minimize costs to Xcel, customers, and developers, and identify any barriers to developing it;
6. Direct Xcel to file a cost-benefit analysis of third-party-owned resources;
7. Direct Xcel to develop a competitively procured product for all services, not just technology and construction;
8. Direct Xcel to create a competitively procured aggregated virtual power plant solicitation modeled on Colorado's AVPP program;
9. Direct Xcel to make all grid data necessary for developer, aggregator, and customer participation publicly available;
10. Prohibit utilization of a single third-party implementer;
11. Reject Xcel's proposal to be exempt from the MN DIP; and,
12. Direct Xcel to consider a DSO alternative.

⁴⁸ *In the Matter of a Commission Investigation into the Potential Role of Third-Party Aggregation of Retail Customers*, Xcel Comments, Docket No. 22-600 at 10 (filed March 13, 2023).

Conclusion

R Street thanks the Commission for the opportunity to comment on these important topics.

Respectfully submitted,

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December 10, 2025

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing pleading has this day been served on each person whose name appears on the Official Service List for E002/M-25-378, as attached.

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

xx electronic filing

/s/ Christopher Villarreal
Christopher Villarreal

Dated at Eden Prairie, Minnesota
This 10th Day of December 2025.

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123	Matthew	Lacey	mlacey@grenergy.com	Great River Energy		12300 Elm Creek Boulevard	Electronic Service		No	M-25-378

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						Maple Grove MN, 55369-4718 United States				
124	Carmel	Laney	carmel.laney@stoel.com	Stoel Rives LLP		33 South Sixth Street Suite 4200 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-378
125	Arthur	LaRose	arthur.larose@llojibwe.net	Leech Lake Band of Ojibwe		190 Sailstar Drive NW Cass Lake MN, 56633 United States	Electronic Service		No	M-25-378
126	Robert L	Larsen	robert.larsen@lowersioux.com	Lower Sioux Indian Community		PO Box 308 39527 Reservation Highway 1 Morton MN, 56270 United States	Electronic Service		No	M-25-378
127	Mark	Larson	mlarson@meeker.coop	Meeker Coop Light & Power Assn		1725 Highway 12 E Ste 100 Litchfield MN, 55355 United States	Electronic Service		No	M-25-378
128	Michelle	Larson	michelle@redwingchamber.com	Red Wing Area Chamber of Commerce		439 Main Street Red Wing, MN Bay Point Park MN, 55066 United States	Electronic Service		No	M-25-378
129	Peder	Larson	plarson@larkinhoffman.com	Larkin Hoffman Daly & Lindgren, Ltd.		8300 Norman Center Drive Suite 1000 Bloomington MN, 55437 United States	Electronic Service		No	M-25-378
130	Amber	Lee	amber.lee@stoel.com	Stoel Rives LLP		33 S. 6th Street Suite 4200 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-378
131	Rachel	Leonard	rachel.leonard@ci.monticello.mn.us	City of Monticello		505 Walnut St Ste 1 Monticello MN, 55362 United States	Electronic Service		No	M-25-378
132	Dan	Leshner	dlesher@greenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	M-25-378
133	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	M-25-378
134	Michelle	Lommel	mlommel@greenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	M-25-378
135	Alice	Madden	alice@communitypowermn.org	Community Power		2720 E 22nd St Minneapolis MN, 55406 United States	Electronic Service		No	M-25-378
136	Kavita	Maini	kmaini@wi.rr.com	KM Energy Consulting, LLC		961 N Lost Woods Rd Oconomowoc WI, 53066 United States	Electronic Service		No	M-25-378

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
137	Christine	Marquis	regulatory.records@xcelenergy.com	Xcel Energy		414 Nicollet Mall MN1180-07-MCA Minneapolis MN, 55401 United States	Electronic Service		Yes	M-25-378
138	Dawn S	Marsh	dawn_marsh@fws.gov	U.S. Fish & Wildlife Service		Minnesota-Wisconsin Field Offices 4101 American Blvd E Bloomington MN, 55425 United States	Electronic Service		No	M-25-378
139	Emily	Marshall	emarshall@lourismarshall.com	Miller O'Brien Jensen, PA		120 S. 6th Street Suite 2400 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-378
140	Katherine	Marshall	katie.marshall@lawmoss.com	Moss & Barnett		150 S 5th St Ste 1200 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-378
141	Mary	Martinka	mary.a.martinka@xcelenergy.com	Xcel Energy Inc		414 Nicollet Mall 7th Floor Minneapolis MN, 55401 United States	Electronic Service		No	M-25-378
142	Gregg	Mast	gmast@cleanenergyeconomymn.org	Clean Energy Economy Minnesota		4808 10th Avenue S Minneapolis MN, 55417 United States	Electronic Service		No	M-25-378
143	Shena	Matrious	shena.matrious@millelacsband.com	Mille Lacs Band of Ojibwe		43408 Oodena Drive Onamia MN, 56349 United States	Electronic Service		No	M-25-378
144	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	M-25-378
145	Erica	McConnell	emcconnell@elpc.org	Environmental Law & Policy Center		35 E. Wacker Drive, Suite 1600 Chicago IL, 60601 United States	Electronic Service		No	M-25-378
146	April	McCormick	aprilm@grandportage.com	Grand Portage Band of Lake Superior Chippewa		PO Box 428 Grand Portage MN, 55605 United States	Electronic Service		No	M-25-378
147	Taylor	McNair	taylor@gridlab.org			668 Capp Street San Francisco CA, 94110 United States	Electronic Service		No	M-25-378
148	Ronald	Meier	rmeier@mcleodcoop.com	Mcleod Cooperative Power		3515 11th St East Glencoe MN, 55336 United States	Electronic Service		No	M-25-378
149	Melanie	Mesko Lee	melanie.lee@burnsvillemn.gov	City of Burnsville		100 Civic Center Parkway Burnsville MN, 55337-3867 United States	Electronic Service		No	M-25-378

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
150	Peder	Mewis	pmewis@cleangridalliance.org	Clean Grid Alliance		570 Asbury St. St. Paul MN, 55104 United States	Electronic Service		No	M-25-378
151	Valentina	Mgeni	valentina.mgeni@piic.org	Prairie Island Indian Community		Prairie Island Indian Community 5636 Sturgeon Lake Road Welch MN, 55089 United States	Electronic Service		No	M-25-378
152	Cole W.	Miller	cole.miller@shakopeedakota.org	Shakopee Mdewakanton Sioux Community		Shakopee Mdewakanton Sioux Community 2330 Sioux Trail NW Prior Lake MN, 55372 United States	Electronic Service		No	M-25-378
153	Stacy	Miller	stacy.miller@minneapolisismn.gov	City of Minneapolis		350 S. 5th Street Room M 301 Minneapolis MN, 55415 United States	Electronic Service		No	M-25-378
154	David	Moeller	dmoeller@allete.com	Minnesota Power			Electronic Service		No	M-25-378
155	Sarah	Mooradian	sarah@curemn.org	CURE		117 South 1st Street Montevideo MN, 56265 United States	Electronic Service		No	M-25-378
156	Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP		33 South Sixth St Ste 4200 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-378
157	Travis	Morrison	travis.morrison@boisforte-nsn.gov	Bois Forte Band of Chippewa		Bois Forte Tribal Government 5344 Lakeshore Drive Nett Lake MN, 55772 United States	Electronic Service		No	M-25-378
158	David	Morrison, Sr.	david.morrison@boisforte-nsn.gov	Bois Forte Band of Chippewa		Bois Forte Tribal Government 5344 Lakeshore Drive Nett Lake MN, 55772 United States	Electronic Service		No	M-25-378
159	Evan	Mulholland	emulholland@mncenter.org	Minnesota Center for Environmental Advocacy		1919 University Ave W Ste 515 Saint Paul MN, 55101 United States	Electronic Service		No	M-25-378
160	Alan	Muller	alan@greendel.org	Energy & Environmental Consulting		1110 West Avenue Red Wing MN, 55066 United States	Electronic Service		No	M-25-378
161	Sonny	Myers	smyers@1854treatyauthority.org	1854 Treaty Authority		4428 Haines Rd Duluth MN, 55811-1524 United States	Electronic Service		No	M-25-378
162	Pouya	Najmaie	najm0001@gmail.com	Cooperative Energy Futures		3416 16th Ave S Minneapolis	Electronic Service		No	M-25-378

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						MN, 55407 United States				
163	Carl	Nelson	cnelson@mncee.org	Center for Energy and Environment		212 3rd Ave N Ste 560 Minneapolis MN, 55401 United States	Electronic Service		No	M-25-378
164	Deb	Nelson	dnelson@grenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	M-25-378
165	David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency		220 South Sixth Street Suite 1300 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-378
166	Duane	Ninneman	duane@cureriver.org	Clean Up the River Environment		117 South 1st St Montevideo MN, 56265 United States	Electronic Service		No	M-25-378
167	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	M-25-378
168	Ric	O'Connell	ric@gridlab.org	GridLab		2120 University Ave Berkeley CA, 94704 United States	Electronic Service		No	M-25-378
169	Logan	O'Grady	logrady@mnseia.org	Minnesota Solar Energy Industries Association		2288 University Ave W St. Paul MN, 55114 United States	Electronic Service		No	M-25-378
170	Joseph	OBrien	joey.obrien@lowersioux.com			39527 Highway 1 Morton MN, 56270 United States	Electronic Service		No	M-25-378
171	Carol A.	Overland	overland@legalelectric.org	Legalelectric - Overland Law Office		1110 West Avenue Red Wing MN, 55066 United States	Electronic Service		No	M-25-378
172	Gregory	Padden	gpadden@grenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	M-25-378
173	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		No	M-25-378
174	Marsha	Parlow	mparlow@grenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	M-25-378
175	Priti	Patel	ppatel@grenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369-4718 United States	Electronic Service		No	M-25-378
176	Earl	Pendleton	earl.pendleton@lowersioux.com	Lower Sioux Indian Community		39527 Highway 1 Morton MN, 56270 United States	Electronic Service		No	M-25-378

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
177	Gordon	Pietsch	gpietsch@grenergy.com	Great River Energy		12300 Elm Creek Blvd. Maple Grove MN, 55369-4718 United States	Electronic Service		No	M-25-378
178	Joe	Plumer	joe.plumer@redlakenation.org	Red Lake Nation		15484 Migizi Drive Red Lake MN, 56671 United States	Electronic Service		No	M-25-378
179	J.	Porter	greg.porter@nngco.com	Northern Natural Gas Company		1111 South 103rd St Omaha NE, 68124 United States	Electronic Service		No	M-25-378
180	Brian H.	Potts	brian.potts@huschblackwell.com	Husch Blackwell		33 E Main St Ste 300 Madison WI, 53703 United States	Electronic Service		No	M-25-378
181	Kevin	Pranis	kpranis@liunagroc.com	Laborers' District Council of MN and ND		81 E Little Canada Road St. Paul MN, 55117 United States	Electronic Service		No	M-25-378
182	Robert	Prescott	bob.prescott@lowersioux.com	Lower Sioux Indian Community		39527 Highway 1 Morton MN, 56270 United States	Electronic Service		No	M-25-378
183	Jody	Puddu	jody.puddu@piic.org	Prairie Island Indian Community		5636 Sturgeon Lake Rd Welch MN, 55089 United States	Electronic Service		No	M-25-378
184	Kurt	Rempe	krempe@nationalgridrenewables.com	National Grid Renewables Development, LLC		8400 Normandale Lake Blvd Suite 1200 Bloomington MN, 55437 United States	Electronic Service		No	M-25-378
185	Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	1400 BRM Tower 445 Minnesota St St. Paul MN, 55101-2131 United States	Electronic Service		Yes	M-25-378
186	Kevin	Reuther	kreuther@mncenter.org	MN Center for Environmental Advocacy		26 E Exchange St, Ste 206 St. Paul MN, 55101-1667 United States	Electronic Service		No	M-25-378
187	Stephan	Roos	stephan.roos@state.mn.us		Minnesota Department of Agriculture	625 Robert St N Saint Paul MN, 55155-2538 United States	Electronic Service		No	M-25-378
188	Alan	Roy	alan.roy@whiteearth-nsn.gov	White Earth Nation		White Earth Tribal Headquarters 35500 Eagle View Road Ogema MN, 56569 United States	Electronic Service		No	M-25-378

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
189	Bill	Rudnicki	bill.rudnicki@shakopeedakota.org	Shakopee Mdewakanton Sioux Community		Shakopee Mdewakanton Sioux Community 2330 Sioux Trail NW Prior Lake MN, 55372 United States	Electronic Service		No	M-25-378
190	Nathaniel	Runke	nrunke@local49.org			611 28th St. NW Rochester MN, 55901 United States	Electronic Service		No	M-25-378
191	Zachary	Ruzycki	zruzycki@grenergy.com	Great River Energy		12300 Elm Creek Boulevard Maple Grove MN, 55369 United States	Electronic Service		No	M-25-378
192	Miranda	Sam	miranda.sam@lowersioux.com	Lower Sioux Indian Community		39527 Reservation Highway 1 PO Box 308 Morton MN, 56270 United States	Electronic Service		No	M-25-378
193	Joseph L	Sathe	jsathe@kennedy-graven.com	Kennedy & Graven, Chartered		150 S 5th St Ste 700 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-378
194	Adam	Savariego	adams@uppersiouxcommunity-nsn.gov	Upper Sioux Community		5722 Travers Lane PO Box 147 Granite Falls MN, 56241 United States	Electronic Service		No	M-25-378
195	Richard J.	Savelkoul	rsavelkoul@martinsquires.com	Martin & Squires, PA		332 Minnesota St Ste W2750 St. Paul MN, 55101 United States	Electronic Service		No	M-25-378
196	Jeff	Schneider	jeff.schneider@ci.red-wing.mn.us	City of Red Wing		315 West 4th Street Red Wing MN, 55066 United States	Electronic Service		No	M-25-378
197	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		No	M-25-378
198	Ronald J.	Schwartau	rschwartau@noblesce.com	Nobles Electric Cooperative		22636 U.S. Hwy. 59 Worthington MN, 56187 United States	Electronic Service		No	M-25-378
199	Douglas	Seaton	doug.seaton@umwlc.org	Upper Midwest Law Center		8421 Wayzata Blvd Ste 300 Golden Valley MN, 55426 United States	Electronic Service		No	M-25-378
200	Jessie	Seim	jessie.seim@piic.org	Prairie Island Indian Community		5636 Sturgeon Lake Rd Welch MN, 55089 United States	Electronic Service		No	M-25-378
201	Darrell	Seki, Sr.	dseki@redlakenation.org			15484 Migizi Drive Red Lake MN, 56671 United States	Electronic Service		No	M-25-378

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
202	Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates		7400 Lyndale Ave S Ste 190 Richfield MN, 55423 United States	Electronic Service		No	M-25-378
203	Andrew R.	Shedlock	andrew.shedlock@kutakrock.com	Kutak Rock LLP		60 South Sixth St Ste 3400 Minneapolis MN, 55402-4018 United States	Electronic Service		No	M-25-378
204	Beth	Smith	bsmith@greatermankato.com	Greater Mankato Growth		1961 Premier Dr Ste 100 Mankato MN, 56001 United States	Electronic Service		No	M-25-378
205	Joel	Smith	jsmith@mnchippewatribe.org	Minnesota Chippewa Tribe		PO Box 217 Cass Lake MN, 56633 United States	Electronic Service		No	M-25-378
206	Joshua	Smith	joshua.smith@sierraclub.org			85 Second St FL 2 San Francisco CA, 94105 United States	Electronic Service		No	M-25-378
207	Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.		76 W Kellogg Blvd St. Paul MN, 55102 United States	Electronic Service		No	M-25-378
208	Nizhoni	Smith	nizhoni.smith@lowersioux.com	Lower Sioux Indian Community		PO Box 308 39527 Reservation Highway 1 Morton MN, 56270 United States	Electronic Service		No	M-25-378
209	Roger	Smith, Sr.	rogermsmithsr@fdlrez.com			1720 Big Lake Road Cloquet MN, 55720 United States	Electronic Service		No	M-25-378
210	Beth	Soholt	bsoholt@cleangridalliance.org	Clean Grid Alliance		570 Asbury Street Suite 201 St. Paul MN, 55104 United States	Electronic Service		No	M-25-378
211	Anna	Sommer	asommer@energyfuturesgroup.com	Energy Futures Group		PO Box 692 Canton NY, 13617 United States	Electronic Service		No	M-25-378
212	Marie	Spry	mariespry@grandportage.com			PO Box 428 Grand Portage MN, 55605 United States	Electronic Service		No	M-25-378
213	Mark	Spurr	mspurr@fvbenergy.com	International District Energy Association		222 South Ninth St., Suite 825 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-378
214	Michael	Stalberger	michael.stalberger@blueearthcountymn.gov	Blue Earth County		410 S 5th Street Mankato MN, 56001 United States	Electronic Service		No	M-25-378
215	Sean	Stalpes	sean.stalpes@state.mn.us		Public Utilities Commission	121 E. 7th Place, Suite 350 Saint Paul MN, 55101-2147 United States	Electronic Service		No	M-25-378
216	LeRoy	Staples Fairbanks III	leroy.fairbanks@llojbwe.net	Leech Lake Band of		190 Sailstar Drive NW	Electronic Service		No	M-25-378

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
				Ojibwe		Cass Lake MN, 56633 United States				
217	Byron E.	Starns	byron.starns@stinson.com	STINSON LLP		50 S 6th St Ste 2600 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-378
218	Mark	Strohfus	mstrohfus@grenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	M-25-378
219	Samuel	Strong	sam.strong@redlakenation.org	Red Lake Nation		15484 Migizi Drive Red Lake MN, 56671 United States	Electronic Service		No	M-25-378
220	Timothy	Sullivan	tsullivan@whe.org	Wright Hennepin Coop. Electric Assn.		6800 Electric Drive PO Box 330 Rockford MN, 55373 United States	Electronic Service		No	M-25-378
221	David	Sunderman	daves@benco.org	BENCO (DUPLICATE)		PO Box 8 Mankato MN, 56002-0008 United States	Electronic Service		No	M-25-378
222	Camille	Tanhoff	kamip@uppersiouxcommunity-nsn.gov	Upper Sioux Community		5722 Travers Lane PO BOX 147 Granite Falls MN, 56241 United States	Electronic Service		No	M-25-378
223	Tim	Thompson	tthompson@lrec.coop	Lake Region Electric Cooperative		PO Box 643 1401 South Broadway Pelican Rapids MN, 56572 United States	Electronic Service		No	M-25-378
224	Geoffrey	Tolley	geoff.tolley@gmail.com			855 Stanley Road Two Harbors MN, 55616-1176 United States	Electronic Service		No	M-25-378
225	Jayme	Trusty	execdir@swrdc.org	SWRDC		2401 Broadway Ave #1 Slayton MN, 56172 United States	Electronic Service		No	M-25-378
226	Caralyn	Trutna	carrie@uppersiouxcommunity-nsn.gov	Upper Sioux Community		Upper Sioux Community P.O. Box 147 Granite Falls MN, 55372 United States	Electronic Service		No	M-25-378
227	Jen	Tyler	tyler.jennifer@epa.gov	US Environmental Protection Agency		Environmental Planning & Evaluation Unit 77 W Jackson Blvd. Mailstop B-19J Chicago IL, 60604-3590 United States	Electronic Service		No	M-25-378
228	Jackie	Van Norman	jvannorman@grenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	M-25-378
229	Sam	Villella	sdvillella@gmail.com			10534 Alamo Street NE Blaine MN, 55449 United States	Electronic Service		No	M-25-378

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
230	Carla	Vita	carla.vita@state.mn.us	MN DEED		Great Northern Building 12th Floor 180 East Fifth Street St. Paul MN, 55101 United States	Electronic Service		No	M-25-378
231	Julie	Voeck	julie.voeck@nee.com	NextEra Energy Resources, LLC		700 Universe Blvd Juno Beach FL, 33408 United States	Electronic Service		No	M-25-378
232	Amelia	Vohs	avohs@mncenter.org	Minnesota Center for Environmental Advocacy		1919 University Avenue West Suite 515 St. Paul MN, 55104 United States	Electronic Service		No	M-25-378
233	Trent	Waite	twaite@grenergy.com			null null, null United States	Electronic Service		No	M-25-378
234	Cynthia	Warzecha	cynthia.warzecha@state.mn.us	Minnesota Department of Natural Resources		500 Lafayette Road Box 25 St. Paul MN, 55155-4040 United States	Electronic Service		No	M-25-378
235	Julianna	Wei	julianna.wei@rondo.com	Rondo Energy, Inc.		1960 North Loop Alameda CA, 94502 United States	Electronic Service		No	M-25-378
236	Heather	Westra	heather.westra@piic.org	Prairie Island Indian Community		5636 Sturgeon Lake Rd Welch MN, 55089 United States	Electronic Service		No	M-25-378
237	Alan	Whipple	sa.property@state.mn.us		Minnesota Department Of Revenue	Property Tax Division 600 N. Robert Street St. Paul MN, 55146-3340 United States	Electronic Service		No	M-25-378
238	Steve	White	steve.white@llojibwe.net	Leech Lake Band of Ojibwe		190 Sailstar Drive NW Cass Lake MN, 56633 United States	Electronic Service		No	M-25-378
239	Cody	Whitebear	cody.whitebear@piic.org	Prairie Island Indian Community		5636 Sturgeon Lake Road Welch MN, 55089 United States	Electronic Service		No	M-25-378
240	John	Williams	jwilliams@grenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	M-25-378
241	Laurie	Williams	laurie.williams@sierraclub.org	Sierra Club		Environmental Law Program 1536 Wynkoop St Ste 200 Denver CO, 80202 United States	Electronic Service		No	M-25-378
242	Virgil	Wind	virgil.wind@millelacsband.com	Mille Lacs Band of Ojibwe		43408 Oodena Drive Onamia MN, 56359 United States	Electronic Service		No	M-25-378

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243	Joseph	Windler	jwindler@winthrop.com	Winthrop & Weinstine		225 South Sixth Street, Suite 3500 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-378
244	Rob	Witwer	rob.witwer@onwardenergy.com	Onward Energy Holdings, LLC		767 Third Ave 17th Floor New York NY, 10017 United States	Electronic Service		No	M-25-378
245	Jonathan	Wolfgram	jonathan.wolfgram@state.mn.us		Office of Pipeline Safety	445 Minnesota St Ste 147 Woodbury MN, 55125 United States	Electronic Service		No	M-25-378
246	Tim	Wulling	t.wulling@earthlink.net			1495 Raymond Ave. Saint Paul MN, 55108 United States	Electronic Service		No	M-25-378
247	Laurie	York	laurie.york@whiteearth-nsn.gov	White Earth Reservation Business Committee		PO Box 418 White Earth MN, 56591 United States	Electronic Service		No	M-25-378
248	Curtis	Zaun	czaun@mnseia.org	MnSEIA		PO Box 8141 Saint Paul MN, 55108 United States	Electronic Service		No	M-25-378
249	Kurt	Zimmerman	kwz@ibew160.org	Local Union #160, IBEW		2909 Anthony Ln St Anthony Village MN, 55418-3238 United States	Electronic Service		No	M-25-378
250	Emily	Ziring	eziring@stlouispark.org	City of St. Louis Park		5005 Minnetonka Blvd St. Louis Park MN, 55416 United States	Electronic Service		No	M-25-378
251	Patrick	Zomer	pat.zomer@lawmoss.com	Moss & Barnett PA		150 S 5th St #1200 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-378
252	David	Zoppo	david.zoppo@huschblackwell.com	American Transmission Company LLC		33 East Main Street Suite 300 Madison WI, 53703 United States	Electronic Service		No	M-25-378