

DECISION**BEFORE THE DEPUTY COMMISSIONER OF THE
MINNESOTA DEPARTMENT OF COMMERCE****ADITYA RANADE, DEPUTY COMMISSIONER****Decision**

In the Matter of Technical Guidance
to Determine Eligible Electric Vehicle
Charging Sales to be Deducted from
Utility Gross Annual Retail Energy Sales

Issue Date: December 30, 2021
Docket No. E,G999/CIP-21-837

I. PROCEDURAL HISTORY

On November 2, 2021, the Minnesota Department of Commerce, Division of Energy Resources (Department) convened a virtual stakeholder meeting to discuss major changes to the Conservation Improvement Program (CIP) contained in the Minnesota Energy Conservation and Optimization Act of 2021 (ECO Act).¹

On November 10, 2021, the Department convened a Coordinating Committee consisting of stakeholders interested in assisting the Department in developing technical guidance related to the implementation of the ECO Act's statutory requirements. This committee was then divided into three topic-specific working groups as follows: 1) Electric vehicle charging sales; 2) Efficient fuel-switching; and 3) Load management.

On November 16, 2021, the Department hosted an electric vehicle charging sales working group meeting to discuss stakeholder views on electric vehicle charging sales methodology and assumptions. Working group meeting slides, notes, and comments are available on a public web page.²

On December 14, 2021, Staff of the Minnesota Department of Commerce, Division of Energy Resources (Staff) filed their Proposal Filing (Proposal). The Proposal contained Staff's recommended technical guidance concerning the determination of eligible electric vehicle charging sales to be deducted from utility gross annual retail energy sales as outlined in Minnesota Statutes 216B.2402 subdivision 10.

¹ [Minnesota Energy Conservation and Optimization Act of 2021](#)

² [At Energy Conservation and Optimization \(ECO\) Act Implementation Web Page | The Mendota Group, LLC and MN ECO Act Coordinating Committee - Home \(sharepoint.com\).](#)

On December 21, 2021, the Department received comments on Staff's Proposal from Fresh Energy, Southern Minnesota Municipal Power Agency (SMMPA), Great River Energy (GRE), Otter Tail Power Company (OTP), Minnesota Power (MP), Minnesota Rural Electric Association (MREA),³ Dakota Electric Association (Dakota), Willdan, Center for Energy and Environment (CEE), Xcel Energy (Xcel), Minnesota Municipal Utilities Association (MMUA), and Connexus Energy (Connexus).⁴

³ Note: MREA submitted two sets of comments.

⁴ Organizations are listed in chronological order that written comments were posted on eDockets.

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II. BACKGROUND

The ECO Act was signed into law by Governor Tim Walz on May 25, 2021 and was enacted the next day.⁵ The ECO Act primarily serves to modernize Minnesota’s Conservation Improvement Program (CIP) to provide a more holistic approach to energy efficiency programming. The ECO Act was the result of multiple years of stakeholder discussion and development. Notable highlights of the ECO Act include: providing participating electric and natural gas utilities the opportunity to optimize energy use and delivery through the inclusion of load management⁶ and efficient fuel switching programs⁷; raising the energy savings goals for the state’s electric investor owned utilities (IOUs);⁸ more than doubling the low-income spending requirement for all IOUs;⁹ providing greater planning flexibility for participating municipal and cooperative utilities (COUs);¹⁰ and including activities to improve energy efficiency for public schools.¹¹

Given the significance and complexity of some of the changes brought about by the ECO Act, the legislation instructs the Department to work with stakeholders to develop guidance in the following matters:

- Multifamily Buildings – Guidelines for utilities to use to determine the eligibility of multifamily buildings to participate in CIP low-income programs¹²
- Electric Vehicle Charging Sales – Methodology and assumptions to determine electric vehicle charging sales that are not to be included in a utility’s gross annual retail energy sales¹³
- Efficient Fuel Switching – Technical guidelines for utilities to use to determine if a fuel-switching improvement meets the necessary criteria and to calculate the amount of energy saved¹⁴¹⁵

This Decision concerns electric vehicle charging sales. Specifically, it includes the approved methodology and assumptions required for determining electric vehicle charging sales that are eligible not to be included in a utility’s gross annual retail energy sales.

⁵ [Minnesota Energy Conservation and Optimization Act of 2021](#)

⁶ See Minn. Stat. § 216B.241, subd. 13.

⁷ See Minn. Stat. § 216B.2403, subd. 8.

⁸ Minn. Stat. § 216B.241, subd. 1c(b).

⁹ Minn. Stat. § 216B.241, subd. 7(a).

¹⁰ Minn. Stat. § 216B.2403, subd. 3.

¹¹ See Minn. Stat. §§ 216B.2403, subd 3(j) and 216B.241, subd. 2(i).

¹² See Minn. Stat. § 216B.2403, subd. 5(e).

¹³ Minn. Stat. § 216B.2402, subd. 10(3).

¹⁴ § 216B.241, subd. 1d(e).

¹⁵ Note: Though not required by statute, the Department is also working with stakeholders to provide guidance for the implementation of cost-effective load management programs as described in Minn. Stat. § 216B.241, subd. 13.

The energy savings goal for a utility participating in CIP is calculated as a percentage of the utility's gross annual retail energy sales.¹⁶ Minnesota Statutes section 216B.2402, subdivision 10 defines "gross annual retail energy sales" as "a utility's annual electric sales to all Minnesota retail customers, or natural gas throughput to all retail customers, including natural gas transportation customers, on a utility's distribution system in Minnesota." Section 216B.2402, subdivision 10 goes on to read that:

Gross annual retail energy sales does not include:

... (3) the amount of electric sales prior to December 31, 2032, that are associated with a utility's program, rate, or tariff for electric vehicle charging based on a methodology and assumptions developed by the department in consultation with interested stakeholders no later than December 31, 2021. After December 31, 2032, incremental sales to electric vehicles must be included in calculating a utility's gross annual retail sales.

III. COMMENTS BY INTERESTED PARTIES

By the end of the comment period on December 21, 2021, the Department received comments on Staff's Proposal from Fresh Energy, Southern Minnesota Municipal Power Agency (SMMPA), Great River Energy (GRE), Otter Tail Power Company (OTP), Minnesota Power (MP), Minnesota Rural Electric Association (MREA),¹⁷ Dakota Electric Association (Dakota), Willdan,¹⁸ Center for Energy and Environment (CEE), Xcel Energy (Xcel), Minnesota Municipal Utilities Association (MMUA), and Connexus Energy (Connexus).¹⁹

The Deputy Commissioner thanks those organizations who participated in the Electric Vehicle Charging Sales working group and those that submitted written comments in a much-shortened comment period. Typically, the Deputy Commissioner would summarize comments received by the Department from each organization and respond with Deputy Commissioner's determinations. Given the shortened timeframe between the comment period and the Deputy Commissioner's Decision, however, the Deputy Commissioner has organized comments by issue (in the same order as Staff's Proposed Decision) and issues Deputy Commissioner's determinations specific to those issues.²⁰

¹⁶ § 216B.2403, subd. 2(a).

¹⁷ Note: MREA submitted two sets of comments.

¹⁸ Willdan's comments concern efficient fuel switching and are outside of the scope of this Decision. The Deputy Commissioner encourages Willdan to share these comments as part of the ongoing efficient fuel switching working group.

¹⁹ Organizations are listed in chronological order that written comments were posted on eDockets.

²⁰ To review comments in full, interested parties should go to [eDockets](#) and search for docket number 21-837.

A. Comments Regarding Department Consultation with Interested Stakeholders

In the Proposal, Staff detailed ways in which interested stakeholders have been consulted in the development of electric vehicle charging sales methodology and assumptions in a manner required Minnesota Statutes section 216B.2402 subdivision 10.

Comments received from stakeholders were generally supportive and appreciative of the efforts made by Staff to consult with stakeholders. No comments were received suggesting that stakeholder consultation was inadequate.

Deputy Commissioner's Determinations:

The Deputy Commissioner finds that Staff sufficiently consulted stakeholders in the development of electric vehicle charging sales methodologies and assumptions contained in the Proposal. The Deputy Commissioner also acknowledges and appreciates the efforts of stakeholders in participating in the Electric Vehicle Charging Sales working group and developing detailed and thoughtful written comments in response to Staff's Proposal.

B. Comments Regarding Proposed Methodology and Assumptions

Comments regarding Staff's proposed electric vehicle charging sales methodology and assumptions are addressed as follows: 1) The proposed requirement to demonstrate a connection between electric vehicle charging sales and a utility's program, rate, or tariff for electric vehicle charging; 2) Proposed methods by which a utility can demonstrate a connection between electric vehicle charging sales and a utility's program, rate, or tariff for electric vehicle charging; 3) Additional methodologies proposed by stakeholders; and 4) The development of deemed values.

a. Proposed Requirement to Demonstrate a Connection Between Electric Vehicle Charging Sales and a Utility's Program, Rate, or Tariff for Electric Vehicle Charging

In the Proposal, Staff wrote that "[i]n determining those electric sales not to be included in a utility's gross annual retail energy sales, 216B.2402 subdivision 10(3) specifically qualifies those sales as "the amount of electric sales prior to December 31, 2032, that are associated with a utility's program, rate, or tariff for electric vehicle charging." (emphasis added). Department Staff read this language to mean that a utility must demonstrate a connection between electric vehicle charging sales and that utility's program, rate, or tariff for electric vehicle charging, for those sales to then be removed from its gross annual retail energy sales."²¹

²¹ Staff's Proposed Decision at 5.

Comments from Non-Utility Stakeholders

While neither address this issue specifically, CEE and Fresh Energy both appear to support Staff's requirement that a utility demonstrate a connection between electric vehicle charging sales and that utility's program, rate, or tariff for electric vehicle charging, for those sales to then be removed from its gross annual retail energy sales. CEE states that "[w]e support Department staff's recommended methodology. We believe staff's proposal appropriately balances the need for accurate data with the data constraints that some utilities face."²² Fresh Energy wrote that:

Fresh Energy supports the Department's interpretation of the ECO Act legislation regarding EV energy sales, i.e. that "[g]ross annual retail energy sales does not include...(3) the amount of electric sales prior to December 31, 2032 that are associated with a utility's program, rate or tariff for electric vehicle charging [emphasis added]." The intent of the legislation clearly stipulates that only energy sales from EVs on an EV charging-specific or equivalent program, rate or tariff should eligible to be deducted from a utilities annual retail energy sales."²³

Comments from Electric IOUs

Xcel has concerns with Staff's requirement:

The Company believes this is a narrow interpretation of Minnesota Statutes section 216B.2402, subdivision 10(3) to require an explicit connection between a program, rate, or tariff and electric sales to EVs. First, this is an overly narrow interpretation of statutory language that simply requires EV sales to be "associated with" – as opposed to referring to sales "through," "on," or "subject to" – a utility's program, rate, or tariff for electric vehicle charging. Contrary to Staff's suggestion that the legislature wanted to divide EV sales, and treat some different than others, the inclusive language instead demonstrates that the legislature intended to treat all EVs in the same manner. This is consistent with the legislative policy goal to promote EV adoption and not penalize utilities for greater EV charging loads.²⁴

Xcel further states that:

Staff's interpretation could meaningfully hamper [Xcel's] ability to achieve future CIP goals. Unlike many more traditional electric loads, EVs do not provide significant energy efficiency opportunities that can be realized through CIP. This is

²² CEE Comments at 2.

²³ Fresh Energy Comments at 1.

²⁴ Xcel Comments at 2.

true regardless of whether the vehicle is charged at a location served under an EV-specific tariff or through standard service.²⁵

Otter Tail Power's comments focus not on Staff's interpretation of the statute itself, but on the impact of such an interpretation:

[T]he Department's interpretation of the statute adds to the statute and requires "a utility must demonstrate a connection between electric vehicle charging sales and that utility's program, rate or tariff for electric vehicle charging, for those sales to be removed from its gross annual retail energy sales." Otter Tail believes the Department's interpretation of the statute to only include electric vehicle (EV) sales that are on a rate or tariff specific to EVs, has good intentions and sounds good on the surface but is misguided in application. A requirement such as this could result in much higher costs for customers and act as a deterrent in growing EV adoption going forward.²⁶

Otter Tail explains its concern of higher customer costs as follows:

The proposal by the Department, requiring the only EV sales allowed to be deducted from gross sales to have a "connection" to a specific EV rate, could encourage a utility to recommend more metering and costs to the EV customer, if not the utility would be penalized as additional EV energy sales will be included in its gross sales number. To encourage EV adoption, utilities inherently have an interest to keep customer costs low by educating and encouraging offpeak/low-cost charging.²⁷

Minnesota Power's comments did not address Staff's proposed requirement to demonstrate a connection between electric vehicle charging sales and a utility's program, rate, or tariff for electric vehicle charging.

Comments from Cooperative Utilities

In response to Staff's proposed requirement to demonstrate a connection between electric vehicle charging sales and a utility's program, rate, or tariff for electric vehicle charging, MREA commented:

First, Staff reads the statute to require a utility to demonstrate a direct connection between electric vehicle charging sales and that utility's program, rate, or tariff for electric vehicle charging, before those sales can be removed from its gross annual retail energy sales. Then, Staff proposed three ways for utilities to

²⁵ *Id.*

²⁶ Otter Tail Power Comments at 1.

²⁷ *Id.* at 2.

demonstrate such a connection and calculate associated sales. Each of those proposed methods are based on a requirement for verifiable metered and/or EV-specific programmatic data, which, to the MREA, results in an overly restrictive reading of this portion of the ECO statute.²⁸

Separate comments submitted by Connexus Energy, Dakota Electric Association, and Great River Energy were consistent with, and supportive of, MREA's comment regarding this particular proposed requirement.

Comments from Municipal Utilities

MMUA commented specifically on Staff's proposed requirement to demonstrate a connection between electric vehicle charging sales and a utility's program, rate, or tariff for electric vehicle charging:

The requirement that sales be associated with a "program, rate, or tariff" is intended to offer multiple ways a charging sale could qualify and should be read expansively not as limiting eligibility. Further, the fact that such sales only need to be "associated with" any of the preceding, not "directly related to" or "expressly provided in" indicates the language should be read broadly and not as overly restrictive.

Had the legislature intended to limit the types of charging sales eligible to be exempted from retail sales, they could have used very concise language and stated that only such sales would qualify. Instead, they adopted broad language and left it to the discretion of the Department, in consultation with stakeholders, to work out details.²⁹

Separate comments submitted by SMMPA were consistent with, and supportive of, MMUA's comments regarding this particular proposed requirement.

Deputy Commissioner's Determinations:

The Deputy Commissioner agrees with Staff that:

In determining those electric sales not to be included in a utility's gross annual retail energy sales, 216B.2402 subdivision 10(3) specifically qualifies those sales as "the amount of electric sales prior to December 31, 2032, that are associated with a utility's program, rate, or tariff for electric vehicle charging." (emphasis added). Department Staff read this language to mean that a utility must demonstrate a connection between electric vehicle charging sales and that

²⁸ MREA Comments at 4.

²⁹ MMUA Comments at 1-2.

utility's program, rate, or tariff for electric vehicle charging, for those sales to then be removed from its gross annual retail energy sales.³⁰

The Deputy Commissioner acknowledges the argument of Xcel, MMUA and others, that more direct word choices than "associated with" could have been used. Nevertheless, the language in 216B.2402 subdivision 10(3) does qualify eligible sales. As Staff wrote in the Proposal, "[h]ad the legislature intended for all electric vehicle charging sales to be included, the language in Minnesota Statutes 216B.2402 subdivision 10 would reflect such intent."³¹ Moreover, language allowing all electric vehicle charging sales to be backed out of a utility's gross annual retail energy sales, without qualification, would have been a far simpler drafting task for the legislature.

Therefore, for electric vehicle charging sales to be backed out of gross annual retail energy sales pursuant to 216B.2402 subdivision 10(3), the Deputy Commissioner determines that a utility must demonstrate a connection between electric vehicle charging sales and that utility's program, rate, or tariff for electric vehicle charging.

b. Proposed Methods by Which a Utility Can Demonstrate a Connection Between Electric Vehicle Charging Sales and a Utility's Program, Rate, or Tariff for Electric Vehicle Charging

In the Proposal, Staff identified three methods for demonstrating a connection between electric vehicle charging sales and a utility's program, rate or tariff for electric vehicle charging:³²

1. Provide the Department with metered data for electric vehicle charging sales associated with the utility's program, rate, or tariff for electric vehicle charging.
2. If metered data is not available or is not complete, provide the Department with a verifiable number of electric vehicles participating in the utility's program, rate or tariff for electric vehicle charging. This number would then be multiplied by a (to be established) deemed value to calculate sales to be removed from the utility's gross annual retail energy sales.
3. If the utility does not have metered data or a specific electric vehicle charging program, rate, or tariff, provide the Department with a verifiable number of electric vehicles participating in a utility program, rate, or tariff that is designed to optimize the timing of electric vehicle charging. This number would then be multiplied by a (to be established) deemed value to calculate sales to be removed from the utility's gross annual retail energy sales.

³⁰ Staff's Proposed Decision at 5.

³¹ *Id.* at 6.

³² *Id.* at 5.

Staff further explained:

The methods above are listed in order of Staff preference and likely accuracy. However, Staff recognize that utilities of different type and size may have different challenges and opportunities to be able to demonstrate verifiable sales in accordance with this provision of statute. Therefore, Staff propose that utilities be able to use a combination of all these methods to produce an accurate number of sales associated with a utility's program, rate, or tariff for electric vehicle charging.

Comments from Non-Utility Stakeholders

In response to the three methods proposed by Staff, CEE states that “[w]e support Department staff’s recommended methodology. We believe staff’s proposal appropriately balances the need for accurate data with the data constraints that some utilities face.” In support of the third method in relation to electric IOUs, CEE commented that:

investor-owned utilities are required to file annual Electric Vehicle Tariff Reports, as well as Transportation Electrification Plans with the Minnesota Public Utilities Commission (Commission). These regulatory filings include information about the number of electric vehicles in the utility’s territory; the programs, rates, and tariffs the utility offers in order to optimize electric vehicle loads on their system; and the number of electric vehicles on managed or off-peak vehicle charging rates or programs. These reports may be used to verify the number of electric vehicles eligible for exclusion for investor-owned utilities through staff’s proposed option three.

Fresh Energy states that it “generally supports the Department’s proposed methodology of how utilities can calculate the energy sales from EVs on electric vehicle charging programs, rates, and tariffs.”³³ More specifically, Fresh Energy “generally supports the flexibility offered by the second and the third methodology. The use of “deemed values” to calculate the energy sales from eligible electric vehicle charging where more accurate data is unavailable offers utilities’ flexibility while still adhering to the intent of the ECO Act legislation to count energy sales from electric vehicles charging as part of a managed charging program or equivalent, i.e. residential time-of-use rate.”³⁴ In response to the third option, Fresh Energy further commented that:

A ready example is a residential or general time-of-use (TOU) rate, which can be considered a managed charging programs if the customer charges an EV on it, and for the purposes of ECO Act, can and should be considered equivalent to EV charging programs since they aim to reach similar outcomes – incentivizing cheaper overnight, off-peak energy usage that reduces overall operating costs for the EV owner and the electric grid. Fresh Energy supports the Department

³³ Fresh Energy Comments at 3.

³⁴ Fresh Energy Comments at 4.

counting these types of programs rates, and tariffs. as eligible under its proposed technical guidance.³⁵

Fresh Energy goes on to provide a variety of methods utilities could use to verify the number of customers participating in an EV specific and non-specific program, rate, or tariff.

Comments from Electric IOUs

Xcel disagrees with Staff's proposed method, stating that:

During the ECO stakeholder meetings, the Company advocated for all utility EV sales to be removed from the gross annual retail energy sales through 2032. We believe that removing all EV sales meets the intent of the statute by not increasing CIP energy savings goals in a way that will create an imbalance between goals and achievable savings potential. This approach also eliminates the need to identify subsets of eligible EV sales. The removal of non-tariff-associated sales along with those directly linked to tariffs does not create a future risk of reducing available cost-effective CIP programming. EV charging sales could be easily calculated by multiplying the number of electric vehicles in the utility's service area (determined based on publicly available vehicle registration data) by the deemed sales value referenced in Staff's methods 1 and 2^{36, 37}

Citing challenges in accurately determining EV customer participation in a non-specific program, rate, or tariff, Otter Tail suggests a broader approach:

Otter Tail recommends flexibility during this ten year window for tracking EV energy sales. Using accurate EV registration data from the MPUC's annual report which is supplied by the Minnesota Driver and Vehicle Services is the most accurate data utilities have for counting EVs. Otter Tail believes the reason the MPUC relies on this data for annual filings is because it is the most accurate data for counting EVs in each utilities' service area. Using the Deemed Savings Database to established deemed annual energy sales values for different types of EVs also is supported by Otter Tail. Using this method will be accurate in capturing utility energy sales to EVs, continues to encourage utilities to promote EVs to its customers without penalty, and complies with the new statute in §216B.2402, subdivision 10, clause 3.³⁸

³⁵ Fresh Energy Comments at 4.

³⁶ Deputy Commissioner assumes that Xcel is referring to Staff's method 2 and 3 as these are the methods that reference deemed values.

³⁷ Xcel Comments at 3.

³⁸ Otter Tail Comments at 3.

Minnesota Power also supports Xcel and Otter Tail’s approach of simply multiplying the number of electric vehicles in the service territory by a deemed value. However, Minnesota Power does go on to state that “should the Department’s recommendation be adopted, given Minnesota Power’s current path towards a first-in-the-state default residential TOD rate that will inherently encourage/incentivize charging over night without being on a dedicated EV rate or program, the Company does appreciate the flexibility built into option three.”³⁹

Comments from Cooperative Utilities

In reference to the three methods Staff proposed for demonstrating a connection between electric vehicle charging sales and a utility’s program, rate or tariff for electric vehicle charging, MREA comments that “[e]ach of those proposed methods are based on a requirement for verifiable metered and/or EV-specific programmatic data, which, to the MREA, results in an overly restrictive reading of this portion of the ECO statute.”⁴⁰ Instead, MREA supports Otter Tail’s approach of simply multiplying the number of electric vehicles in the service territory by a deemed value.

Dakota Electric also has significant concerns with Staff’s approach. First, it asks that metered data not be the only option for measuring EV sales. Second, it raises concerns regarding the amount of resources needed to create and market program, rates, and tariffs for EV sales already happening in its service territory. Third, it questions how sales related to public charging could be counted under Staff’s proposed methodology.⁴¹ Connexus and Great River Energy highlight concerns similar to MREA and support the approach proposed by Otter Tail.⁴²

Comments from Municipal Utilities

In response to Staff’s proposed three methods, MMUA states that it “respectfully requests that the proposed EV charging sales guidelines be revised to be more inclusive regarding the sales eligible to be backed out of a utility’s gross annual retail sales. MMUA does support the recognition of the need to have more than one way to determine eligible sales.”⁴³ While not mentioning a specific approach, MMUA’s comments would appear to support Otter Tail’s suggested approach.

SMMPA supports the type of approach outlined but Otter Tail. In its comments, SMMPA include details on how the Otter Tail approach could be calculated using the number of vehicles in a utility service territory, average miles per vehicle, and EV charger kWh per mile.

³⁹ Minnesota Power Comments at 2.

⁴⁰ MREA Comments at 4.

⁴¹ See Dakota Electric Comments.

⁴² See Connexus and GRE Comments.

⁴³ MMUA Comments at 2.

Deputy Commissioner's Determinations:

Staff's proposed methodology offers utilities three methods that can be used to demonstrate a connection between electric vehicle charging sales and a utility program, rate or tariff. Importantly, Staff's approach allows utilities to use all three approaches, if necessary, to better capture all applicable sales. In response to Staff's proposed methodology, comments from utilities indicate overwhelming utility support for an approach that would simply count all electric vehicles in a utility's service territory and multiply that number by a deemed value. The Deputy Commissioner appreciates the ease and straightforwardness that this approach would provide. However, as stated by the Deputy Commissioner above, "in order for electric vehicle charging sales to be backed out of gross annual retail energy sales pursuant to 216B.2402 subdivision 10(3), the Deputy Commissioner determines that a utility must demonstrate a connection between electric vehicle charging sales and that utility's program, rate, or tariff for electric vehicle charging." The approach favored by utilities does not demonstrate such a connection and is, therefore, not a permissible method.

The Deputy Commissioner agrees with Staff's approach and approves each of these methods for use in demonstrating a connection between electric vehicle charging sales and a utility program, rate or tariff. The Deputy Commissioner instructs Staff to work with stakeholders in 2022 through the Technical Reference Manual (TRM) Advisory Committee process to create deemed value(s) for electric vehicle charging and detail the information that utilities will be required to submit to the Department for eligible electric vehicle charging sales to be backed out of a utility's gross annual retail energy sales. The Deputy Commissioner further instructs Staff to work with stakeholders through the TRM Advisory Committee, on an annual basis, to continue to revise, update, and expand deemed values to ensure accuracy and capture all necessary vehicle categories.

c. Other Potential Means to Verify Electric Vehicle Charging Sales Not Yet Contemplated by the Department

In the Proposal, Staff acknowledged that there may be other potential means to verify electric vehicle charging sales that had not yet been contemplated by the Department and encouraged stakeholders to propose additional methods for inclusion.⁴⁴ In response, CEE proposes the following:

As noted by the Mendota Group in their December 6, 2021 summary report of the stakeholder conversations, investor-owned utilities are required to file annual Electric Vehicle Tariff Reports, as well as Transportation Electrification Plans with the Minnesota Public Utilities Commission (Commission). These regulatory filings include information about the number of electric vehicles in the territory; the programs, rates, and tariffs the utility offers in order to optimize electric vehicle loads on their system; and the number of electric vehicles on managed or off-peak

⁴⁴ Staff's Proposed Decision at 5.

vehicle charging rates or programs. These reports may be used to verify the number of electric vehicles eligible for exclusion for investor-owned utilities proposed option three.

Consumer-owned utilities, however, do not make regulatory filings to the Commission about electric vehicles and, therefore, may not have mechanisms to identify or track electric vehicles on their system. CEE

CEE believes it may be reasonable to provide a simplified option for consumer-owned utilities to determine the number of vehicles eligible for exclusion from their ECO energy savings goals. We recommend that the Department allow consumer-owned utilities that can show that they offer and actively market a program, rate, or tariff that is designed to optimize the timing of electric vehicle charging to determine the number of eligible electric vehicles in their territory by using the Commission analysis of electric vehicles registered with the State of Minnesota. The Commission's analysis includes a publicly available Microsoft Excel spreadsheet with a breakdown of electric vehicle registrations by utility service territory and the data is updated annually.

CEE believes that the above option for consumer-owned utilities will ease the administrative burden of identifying and tracking vehicles for utilities that do not do so already, while also encouraging active efforts by the utility to ensure that electric vehicle loads are optimized.

(emphasis added). While CEE's proposal was filed on December 21, 2021, the comment period deadline, some stakeholders were able to react to this proposal in their comments. MREA submitted supplementary comments indicating its support, stating "[t]his CEE recommendation is entirely in alignment with our recommendations in our initial comments on the draft guidance and would alleviate the concerns we raised there."⁴⁵ Connexus also refers to CEE's proposal in its comments and appears to support the approach, or something similar.⁴⁶

Deputy Commissioner's Determinations:

The Deputy Commissioner appreciates CEE's proposal. Like the Otter Tail proposal, this would allow COUs to calculate electric vehicle charging sales using the Minnesota Public Utility Commission's (Commission) number of electric vehicles in a COU service territory. The approach is distinguishable from the Otter Tail proposal, however, because it requires COUs to offer and actively market to electric vehicle owners a program, rate, or tariff that is designed to optimize the timing of electric vehicle charging to determine the number of eligible electric vehicles in their territory.

⁴⁵ MREA Supplemental Comments at 1-2.

⁴⁶ Connexus Comments at 2.

The Deputy Commissioner agrees with CEE's concerns regarding the additional burden placed on COUs by having to identify and track electric vehicles, compared to electric IOUs that already carry out such tracking. The Deputy Commissioner believes that a version of what CEE is suggesting could be added to Staff's proposed methodology in a manner that establishes the necessary connection between electric vehicle charging sales and a utility's program, rate or tariff.

The Deputy Commissioner, therefore, provides the additional method for COUs to determine eligible sales to be backed out of gross annual retail energy sales:

1. Offer a program, rate, or tariff that is designed to optimize the timing of electric vehicle charging
2. Actively market the program, rate, or tariff to electric vehicle owners
3. Using Commission data, multiply the total number of vehicles in that utility's service territory by a (to be determined) deemed value.

Example: An electric COU offers a residential time-of-use rate that it actively markets to electric vehicle owners through bill inserts, would then be eligible to multiply the total number of electric vehicles listed by the Commission for that service territory by the deemed value.

d. Development of Deemed Values

Staff and stakeholders appear to agree that the TRM Advisory Committee provides the necessary forum for the development of any necessary electric vehicle charging deemed values.

Deputy Commissioner's Determinations:

The Deputy Commissioner instructs Staff to work with stakeholders to determine all necessary deemed values as part of the 2022 TRM Advisory Committee process and continue to review and modify associated deemed values on an annual basis.

The Deputy Commission also agrees with Staff that proposed data, assumptions, and pertinent information demonstrating a connection between electric vehicle charging sales and the utility's program, rate, or tariff for electric vehicle charging should be submitted to the Department on an annual basis as part of the utility's annual CIP status report review process. No comments were received in opposition to this approach.

C. Proposed Timeframe for Calculating Electric Vehicle Charging Sales

Staff proposed that the removal of sales associated with a utility's program, rate, or tariff for electric vehicle charging from a utility's gross annual retail energy sales apply to years 2022-2032. Staff noted that 216B.2402 subdivision 10(3) requires the adoption of "methodology and assumptions developed by the department in consultation with interested stakeholders no later than December 31, 2021," indicating that the methodology and assumptions need to be available for use beginning in 2022. In response to Staff's proposal, MMUA stated:

The statute clearly states that it applies to all such sales prior to December 31, 2032. Staff comments, the current wording of the guidelines, and the sample spreadsheet, however, seems to blur the deadline for issuing guidelines, the date of the first CIP plans which may reflect the back-out, and the dates of eligible sales that can be exempted from a utility's gross annual retail sales. MMUA agrees that, at least for municipal utilities, CIP plans due June 1, 2022, will be the first plans submitted under ECO. MMUA also agrees that the first year's CIP goal set under the plan filed in June 2022 is to be based on a 3-year average of the utility's 2019, 2020, and 2021 gross annual retail sales. However, MMUA believes the utility may back out the cumulative EV charging sales made by the utility through 2021 because such sales will have occurred prior to December 31, 2032. Any other interpretation ignores the plain language of ECO. Of course, the utility would need to show these pre-2022 sales satisfy the criteria adopted by the Department.⁴⁷

Deputy Commissioner's Determinations:

The Deputy Commissioner disagrees with MMUA's response. Had the legislature wished for eligible sales to be deducted retroactively, the statutory language could have clearly reflected such intent. Instead, the legislature provides a date by which the methodology should be developed (December 31, 2021) and a date by which incremental electric vehicle charging sales will be included in a utility's gross annual retail energy sales (December 31, 2032.) It is logical to conclude, therefore, that the methodology is to be applied to the reporting years covered in this time frame.

The Deputy Commissioner agrees with Staff's proposed approach.

D. Proposed Treatment of Electric Vehicle Charging Sales After 2032

In the Proposal, Staff wrote:

216B.2402 subdivision 10(3) requires that "[a]fter December 31, 2032, incremental sales to electric vehicles must be included in calculating a utility's gross annual retail sales." Staff reads this to mean that only new electric vehicle charging sales achieved after 2032 that are associated with a utility's program, rate, or tariff for electric vehicle charging would be counted toward the utility's gross annual retail energy sales. Therefore, Staff propose that the total number of sales associated with a utility's program, rate, or tariff for electric vehicle charging in 2032 continue to be subtracted from the gross annual retail energy sales for years 2033 and beyond.

⁴⁷ MMUA Comments at 2.

MMUA and MREA both supported this proposed approach.⁴⁸ No comments were received in opposition to this proposed approach.

Deputy Commissioner's Determinations:

The Deputy Commissioner agrees with Staff's proposed approach.

E. Proposed Application of Electric Vehicle Charging Sales to Utility CIP Plans

Regarding the application of electric vehicle charging sales to utility CIP plans, Staff wrote:

All utilities participating in CIP have an annual energy savings goal based on a percentage of the utility's gross annual retail energy sales.⁴⁹ The energy savings goal must be calculated based on weather-normalized sales averaged over the most recent three years.⁵⁰ The three most recent years have historically consisted of the three years preceding the year in which the utility is submitting a new plan. For example, the next set of IOU CIP triennial plans are due to be submitted on June 1, 2023 and will cover program years 2024-2026. In this case, the three most recent years will be 2020-2022. Therefore, the IOU energy savings goals for 2024-2026 will be based on an average of each utility's weather normalized gross annual retail energy sales for 2020, 2021, and 2022. For COUs, the next set of CIP plans are due June 1, 2022, meaning that COU energy savings goals for 2023-2025 (assuming a three-year plan) would be based on average weather normalized gross annual retail energy sales for 2019, 2020, and 2021, as they will be the most recent years from which data is available.

As proposed in the previous section, the first year in which eligible electric vehicle charging sales would be backed out of gross annual retail energy sales would be 2022. In the two examples above, eligible electric vehicle charging sales would be backed out of gross annual retail energy sales for program year 2022 in the IOU energy savings goal calculation for the 2024-2026 plan. No eligible electric vehicle charging sales would be removed from the COU calculation for years 2019-2021. Extending these examples to the next planning cycle, the IOUs will submit triennial plans for 2027-2029 on June 1, 2026, using program years 2023, 2024, and 2025 to calculate energy savings goals. Any eligible electric vehicle charging sales would be backed out of gross annual retail energy sales for each of these years. For COUs, (again, assuming a three-year planning cycle is chosen) plans will be submitted June 1, 2025, using program years 2022, 2023, and 2024. Any eligible electric vehicle charging sales would be backed out of gross annual retail energy sales for each of these years.

⁴⁸ MMUA Comments at 2. MREA Comments at 2-3.

⁴⁹ See Minn. Stat. 216B.2403 subd. 2(a) and 216B.241 subd. 1c(b)

⁵⁰ See Minn. Stat. 216B.2403 subd. 2(b) and 216B.241 subd. 1c(b)

Staff also provided a chart illustrating proposed gross annual retail energy sales calculations and applicable program years.

Comments received in response to Staff's proposed application of electric vehicle charging sales to utility CIP plans were generally very supportive.

Deputy Commissioner's Determinations:

The Deputy Commissioner agrees with Staff's proposed approach.

IV. DECISION

The Deputy Commissioner supports Staff's analysis and appreciates their efforts in drafting the recommended technical guidance concerning the determination of eligible electric vehicle charging sales to be deducted from utility gross annual retail energy sales. The Deputy Commissioner also acknowledges and appreciates the efforts of stakeholders in participating in the Electric Vehicle Charging Sales working group and developing detailed and thoughtful written comments in response to Staff's Proposal.

The Deputy Commissioner approves the following methodology and assumptions required for determining electric vehicle charging sales that are eligible not to be included in a utility's gross annual retail energy sales.

A. Requirement to Demonstrate a Connection Between Electric Vehicle Charging Sales and a Utility's Program, Rate, or Tariff for Electric Vehicle Charging

The Deputy Commissioner requires that in determining those electric sales not to be included in a utility's gross annual retail energy sales pursuant to 216B.2402 subdivision 10(3), a utility must demonstrate a connection between electric vehicle charging sales and that utility's program, rate, or tariff for electric vehicle charging.

B. Methods by Which a Utility Can Demonstrate a Connection Between Electric Vehicle Charging Sales and a Utility's Program, Rate, or Tariff for Electric Vehicle Charging

The Deputy Commissioner approves the following three methods for demonstrating a connection between electric vehicle charging sales and a utility's program, rate or tariff for electric vehicle charging:

1. Provide the Department with metered data for electric vehicle charging sales associated with the utility's program, rate, or tariff for electric vehicle charging.
2. If metered data is not available or is not complete, provide the Department with a verifiable number of electric vehicles participating in the utility's program, rate or tariff

for electric vehicle charging. This number would then be multiplied by a (to be established) deemed value to calculate sales to be removed from the utility's gross annual retail energy sales.

3. If the utility does not have metered data or a specific electric vehicle charging program, rate, or tariff, provide the Department with a verifiable number of electric vehicles participating in a utility program, rate, or tariff that is designed to optimize the timing of electric vehicle charging. This number would then be multiplied by a (to be established) deemed value to calculate sales to be removed from the utility's gross annual retail energy sales.

C. Additional Method by Which COUs Can Demonstrate a Connection Between Electric Vehicle Charging Sales and a Utility's Program, Rate, or Tariff for Electric Vehicle Charging

The Deputy Commissioner approves the following additional method for COUs to determine eligible sales to be backed out of gross annual retail energy sales:

1. COU offers a program, rate, or tariff that is designed to optimize the timing of electric vehicle charging
2. COU actively markets the program, rate, or tariff to electric vehicle owners
3. COU, using Minnesota Public Utility Commission data, multiplies the total number of vehicles in that utility's service territory by a (to be determined) deemed value.

D. Development of Deemed Values

The Deputy Commissioner instructs Staff to work with stakeholders in 2022 through the TRM Advisory Committee process to create deemed value(s) for electric vehicle charging and detail the information that utilities will be required to submit to the Department for eligible electric vehicle charging sales to be backed out of a utility's gross annual retail energy sales.

The Deputy Commissioner further instructs Staff to work with stakeholders through the TRM Advisory Committee, on an annual basis, to continue to revise, update, and expand deemed values to ensure accuracy and capture all necessary vehicle categories.

The Deputy Commissioner also requires that data, assumptions, and pertinent information demonstrating a connection between electric vehicle charging sales and the utility's program, rate, or tariff for electric vehicle charging be submitted to the Department on an annual basis as part of the utility's annual CIP status report review process.

E. Timeframe for Calculating Electric Vehicle Charging Sales

The Deputy Commissioner requires that the removal of sales associated with a utility’s program, rate, or tariff for electric vehicle charging from a utility’s gross annual retail energy sales apply to years 2022-2032.

F. Treatment of Electric Vehicle Charging Sales After 2032

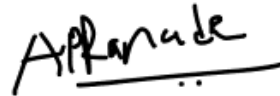
The Deputy Commissioner requires that only new electric vehicle charging sales achieved after 2032 that are associated with a utility’s program, rate, or tariff for electric vehicle charging be counted toward the utility’s gross annual retail energy sales.

Additionally, the Deputy Commissioner requires that the total number of sales associated with a utility’s program, rate, or tariff for electric vehicle charging in 2032 continue to be subtracted from the gross annual retail energy sales for years 2033 and beyond.

G. Application of Electric Vehicle Charging Sales to Utility CIP Plans

The Deputy Commissioner requires that utility’s apply eligible electric vehicle charging sales to CIP plans in a manner consistent with Table 1 in Appendix A.

BY ORDER OF THE DEPUTY COMMISSIONER



Aditya Ranade, Ph.D.
Deputy Commissioner,
Minnesota Department of Commerce,
Division of Energy Resources

V. APPENDIX A

Table 1: Proposed Application of Removal of Eligible Electric Vehicle Charging Sales

| YEAR | [1] Gross Annual Retail Energy Sales | [2] Sales for EV Charging | (Conceptual) Energy Savings Goal Based On | COUs | | | IOUs | | |
|------|---|---------------------------------|---|-------------------------|---------------|---|-------------------------|---------------|--|
| | | | | CIP Triennial Filing | Program Years | Energy Savings Goal GARES Calc Period | CIP Triennial Filing | Program Years | Energy Savings Goal GARES Calc Period |
| 2019 | | | [1] | | | a: uses 3-year WNA for 2019-2021 [1] | | | |
| 2020 | | | [1] | | | | | | a: uses 3-year WNA for 2020-2022 (2022 calc removes [2]) |
| 2021 | | | [1] | | | | | | |
| 2022 | | | [1 -2] | a | | b: uses 3-year WNA for 2022-2024, with sales for year reduced by [2] | | | b: uses 3-year WNA for 2023-2025, with sales for each year reduced by [2]. |
| 2023 | | | [1 -2] | | a | | a | | |
| 2024 | | | [1 -2] | | a | c: uses 3-year WNA for 2025-2027, with sales for each year reduced by [2]. | | a | c: uses 3-year WNA for 2026-2028, with sales for each year reduced by [2]. |
| 2025 | | | [1 -2] | b | a | | b | a | |
| 2026 | | | [1 -2] | | b | d: uses 3-year WNA for 2028-2030, with sales for each year reduced by [2]. | b | a | d: uses 3-year WNA for 2029-2031, with sales for each year reduced by [2]. |
| 2027 | | | [1 -2] | | b | | | b | |
| 2028 | | | [1 -2] | c | b | e: uses 3-year WNA based on 2031 and 2032 reduced by [2] and 2033 reduced by 2032 EV Sales. | | b | e: uses 3-year WNA for 2032-2034 reduced by 2032 EV Sales. |
| 2029 | | | [1 -2] | | c | | c | c | |
| 2030 | | | [1 -2] | | c | f: uses 3-year WNA for 2034-2036 reduced by 2032 EV Sales. | | c | f: uses 3-year WNA for 2035-2037 reduced by 2032 EV Sales. |
| 2031 | | | [1 -2] | d | c | | d | c | |
| 2032 | | | [1 -2] | | d | f: uses 3-year WNA for 2034-2036 reduced by 2032 EV Sales. | d | c | f: uses 3-year WNA for 2035-2037 reduced by 2032 EV Sales. |
| 2033 | | | [1-(2 from 2032)] | | d | | | d | |
| 2034 | | | [1-(2 from 2032)] | e | d | f: uses 3-year WNA for 2034-2036 reduced by 2032 EV Sales. | | d | f: uses 3-year WNA for 2035-2037 reduced by 2032 EV Sales. |
| 2035 | | | [1-(2 from 2032)] | | e | | e | d | |
| 2036 | | | [1-(2 from 2032)] | | e | f: uses 3-year WNA for 2034-2036 reduced by 2032 EV Sales. | | e | f: uses 3-year WNA for 2035-2037 reduced by 2032 EV Sales. |
| 2037 | | | [1-(2 from 2032)] | f | e | | f | e | |
| 2038 | | | [1-(2 from 2032)] | | f | | f | e | |

WNA - weather-normalized average gross annual retail energy sales.

CERTIFICATE OF SERVICE

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

MINNESOTA DEPARTMENT OF COMMERCE – DECISION

Docket No. E, G999/CIP-21-837

Dated this **30th** day of **December 2021**

/s/Marcella Emeott

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| Jim | Erchul | jerchul@dbnhs.org | Daytons Bluff Neighborhood Housing Sv. | 823 E 7th St St. Paul, MN 55106 | Electronic Service | No | SPL_SL_CIP SPECIAL SERVICE LIST |
| Greg | Ernst | gaernst@q.com | G. A. Ernst & Associates, Inc. | 2377 Union Lake Trl Northfield, MN 55057 | Electronic Service | No | SPL_SL_CIP SPECIAL SERVICE LIST |
| Melissa S | Feine | melissa.feine@semcac.org | SEMCAC | PO Box 549 204 S Elm St Rushford, MN 55971 | Electronic Service | No | SPL_SL_CIP SPECIAL SERVICE LIST |
| Sharon | Ferguson | sharon.ferguson@state.mn.us | Department of Commerce | 85 7th Place E Ste 280 Saint Paul, MN 551012198 | Electronic Service | No | SPL_SL_CIP SPECIAL SERVICE LIST |
| Karolanne | Foley | Karolanne.foley@dairylandpower.com | Dairyland Power Cooperative | PO Box 817 La Crosse, WI 54602-0817 | Electronic Service | No | SPL_SL_CIP SPECIAL SERVICE LIST |
| Rob | Friend | rfriend@mnchamber.com | Minnesota Chamber of Commerce - MN Waste Wise Foundation | 400 Robert St N Ste 1500 Saint Paul, MN 55101 | Electronic Service | No | SPL_SL_CIP SPECIAL SERVICE LIST |
| Jenny | Glumack | jenny@mrea.org | Minnesota Rural Electric Association | 11640 73rd Ave N Maple Grove, MN 55369 | Electronic Service | No | SPL_SL_CIP SPECIAL SERVICE LIST |
| Angela E. | Gordon | agordon@trccompanies.com | Lockheed Martin | 1000 Clark Ave. St. Louis, MO 63102 | Electronic Service | No | SPL_SL_CIP SPECIAL SERVICE LIST |

| First Name | Last Name | Email | Company Name | Address | Delivery Method | View Trade Secret | Service List Name |
|------------|-----------|---|--|---|--------------------|-------------------|------------------------------------|
| Pat | Green | N/A | N Energy Dev | City Hall 401 E 21st St Hibbing, MN 55746 | Paper Service | No | SPL_SL_CIP SPECIAL SERVICE LIST |
| Jason | Grenier | jgrenier@otpc.com | Otter Tail Power Company | 215 South Cascade Street Fergus Falls, MN 56537 | Electronic Service | No | SPL_SL_CIP SPECIAL SERVICE LIST |
| Jeffrey | Haase | jhaase@grenergy.com | Great River Energy | 12300 Elm Creek Blvd Maple Grove, MN 55369 | Electronic Service | No | SPL_SL_CIP SPECIAL SERVICE LIST |
| Tony | Hainault | anthony.hainault@co.henn epin.mn.us | Hennepin County DES | 701 4th Ave S Ste 700 Minneapolis, MN 55415-1842 | Electronic Service | No | SPL_SL_CIP SPECIAL SERVICE LIST |
| Tyler | Hamman | tylerh@bepc.com | Basin Electric Power Cooperative | 1717 E Interstate Ave Bismarck, ND 58501 | Electronic Service | No | SPL_SL_CIP SPECIAL SERVICE LIST |
| Patty | Hanson | phanson@rpu.org | Rochester Public Utilities | 4000 E River Rd NE Rochester, MN 55906 | Electronic Service | No | SPL_SL_CIP SPECIAL SERVICE LIST |
| Norm | Harold | N/A | NKS Consulting | 5591 E 180th St Prior Lake, MN 55372 | Paper Service | No | SPL_SL_CIP SPECIAL SERVICE LIST |
| Jared | Hendricks | jared.hendricks@owatonna utilities.com | Owatonna Municipal Public Utilities | PO Box 800 208 S Walnut Ave Owatonna, MN 55060-2940 | Electronic Service | No | SPL_SL_CIP SPECIAL SERVICE LIST |
| Dave | Johnson | dave.johnson@aeoa.org | Arrowhead Economic Opportunity Agency | 702 3rd Ave S Virginia, MN 55792 | Electronic Service | No | SPL_SL_CIP SPECIAL SERVICE LIST |
| Deborah | Knoll | dknoll@mnpower.com | Minnesota Power | 30 W Superior St Duluth, MN 55802 | Electronic Service | No | SPL_SL_CIP SPECIAL SERVICE LIST |

| First Name | Last Name | Email | Company Name | Address | Delivery Method | View Trade Secret | Service List Name |
|------------|------------|------------------------------------|-------------------------------------|--|--------------------|-------------------|---------------------------------|
| Tina | Koecher | tkoecher@mnpower.com | Minnesota Power | 30 W Superior St Duluth, MN 558022093 | Electronic Service | No | SPL_SL_CIP SPECIAL SERVICE LIST |
| Kelly | Lady | kellyl@austinutilities.com | Austin Utilities | 400 4th St NE Austin, MN 55912 | Electronic Service | No | SPL_SL_CIP SPECIAL SERVICE LIST |
| Erica | Larson | erica.larson@centerpointenergy.com | CenterPoint Energy | 505 Nicollet Avenue P.O. Box 59038 Minneapolis, Minnesota 55459-0038 | Electronic Service | No | SPL_SL_CIP SPECIAL SERVICE LIST |
| Martin | Lepak | Martin.Lepak@aeoa.org | Arrowhead Economic Opportunity | 702 S 3rd Ave Virginia, MN 55792 | Electronic Service | No | SPL_SL_CIP SPECIAL SERVICE LIST |
| Corey | Lubovich | coreyl@hpuc.com | Hibbing Public Utilities Commission | 1902 6th Ave E Hibbing, MN 55746 | Electronic Service | No | SPL_SL_CIP SPECIAL SERVICE LIST |
| Pam | Marshall | pam@energycents.org | Energy CENTS Coalition | 823 7th St E St. Paul, MN 55106 | Electronic Service | No | SPL_SL_CIP SPECIAL SERVICE LIST |
| Scot | McClure | scotmcclure@alliantenergy.com | Interstate Power And Light Company | 4902 N Biltmore Ln PO Box 77007 Madison, WI 537071007 | Electronic Service | No | SPL_SL_CIP SPECIAL SERVICE LIST |
| John | McWilliams | John.McWilliams@DairylandPower.com | Dairyland Power Cooperative | 3200 East Ave SPO Box 817 La Crosse, WI 54601-7227 | Electronic Service | No | SPL_SL_CIP SPECIAL SERVICE LIST |
| Brian | Meloy | brian.meloy@stinson.com | STINSON LLP | 50 S 6th St Ste 2600 Minneapolis, MN 55402 | Electronic Service | No | SPL_SL_CIP SPECIAL SERVICE LIST |
| David | Moeller | dmoeller@allete.com | Minnesota Power | 30 W Superior St Duluth, MN 558022093 | Electronic Service | No | SPL_SL_CIP SPECIAL SERVICE LIST |

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|----------------|--------------------------------|--------------------------------------|------------------------------------|--|--------------------|-------------------|---------------------------------|
| Andrew | Moratzka | andrew.moratzka@stoel.com | Stoel Rives LLP | 33 South Sixth St Ste 4200 Minneapolis, MN 55402 | Electronic Service | No | SPL_SL_CIP SPECIAL SERVICE LIST |
| Carl | Nelson | cnelson@mncee.org | Center for Energy and Environment | 212 3rd Ave N Ste 560 Minneapolis, MN 55401 | Electronic Service | No | SPL_SL_CIP SPECIAL SERVICE LIST |
| Samantha | Norris | samanthanorris@alliantenergy.com | Interstate Power and Light Company | 200 1st Street SE PO Box 351 Cedar Rapids, IA 524060351 | Electronic Service | No | SPL_SL_CIP SPECIAL SERVICE LIST |
| Audrey | Partridge | apartridge@mncee.org | Center for Energy and Environment | 212 3rd Ave. N. Suite 560 Minneapolis, Minnesota 55401 | Electronic Service | No | SPL_SL_CIP SPECIAL SERVICE LIST |
| Lisa | Pickard | lseverson@minnkota.com | Minnkota Power Cooperative | 5301 32nd Ave S Grand Forks, ND 58201 | Electronic Service | No | SPL_SL_CIP SPECIAL SERVICE LIST |
| Bill | Poppert | info@technologycos.com | Technology North | 2433 Highwood Ave St. Paul, MN 55119 | Electronic Service | No | SPL_SL_CIP SPECIAL SERVICE LIST |
| Dave | Reinke | dreinke@dakotaelectric.com | Dakota Electric Association | 4300 220th St W Farmington, MN 55024-9583 | Electronic Service | No | SPL_SL_CIP SPECIAL SERVICE LIST |
| Generic Notice | Residential Utilities Division | residential.utilities@ag.state.mn.us | Office of the Attorney General-RUD | 1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131 | Electronic Service | No | SPL_SL_CIP SPECIAL SERVICE LIST |
| Christopher | Schoenherr | cp.schoenherr@smmpa.org | SMMPA | 500 First Ave SW Rochester, MN 55902-3303 | Electronic Service | No | SPL_SL_CIP SPECIAL SERVICE LIST |
| Will | Seuffert | Will.Seuffert@state.mn.us | Public Utilities Commission | 121 7th Pl E Ste 350 Saint Paul, MN 55101 | Electronic Service | No | SPL_SL_CIP SPECIAL SERVICE LIST |

| First Name | Last Name | Email | Company Name | Address | Delivery Method | View Trade Secret | Service List Name |
|------------|-----------|------------------------------------|------------------------------------|--|--------------------|-------------------|---------------------------------|
| Ken | Smith | ken.smith@districtenergy.com | District Energy St. Paul Inc. | 76 W Kellogg Blvd St. Paul, MN 55102 | Electronic Service | No | SPL_SL_CIP SPECIAL SERVICE LIST |
| Anna | Sommer | ASommer@energyfuturesgroup.com | Energy Futures Group | PO Box 692 Canton, NY 13617 | Electronic Service | No | SPL_SL_CIP SPECIAL SERVICE LIST |
| Russ | Stark | Russ.Stark@ci.stpaul.mn.us | City of St. Paul | 390 City Hall 15 West Kellogg Boulevard Saint Paul, MN 55102 | Electronic Service | No | SPL_SL_CIP SPECIAL SERVICE LIST |
| Lynnette | Sweet | Regulatory.records@xcelenergy.com | Xcel Energy | 414 Nicollet Mall FL 7 Minneapolis, MN 554011993 | Electronic Service | No | SPL_SL_CIP SPECIAL SERVICE LIST |
| Kodi | Verhalen | kverhalen@taftlaw.com | Taft Stettinius & Hollister LLP | 80 S 8th St Ste 2200 Minneapolis, MN 55402 | Electronic Service | No | SPL_SL_CIP SPECIAL SERVICE LIST |
| Michael | Volker | mvolker@eastriver.coop | East River Electric Power Coop | 211 S. Harth Ave Madison, SD 57042 | Electronic Service | No | SPL_SL_CIP SPECIAL SERVICE LIST |
| Sharon N. | Walsh | swalsh@shakopeeutilities.com | Shakopee Public Utilities | 255 Sarazin St Shakopee, MN 55379 | Electronic Service | No | SPL_SL_CIP SPECIAL SERVICE LIST |
| Ethan | Warner | ethan.warner@centerpointenergy.com | CenterPoint Energy | 505 Nicollet Mall Minneapolis, Minnesota 55402 | Electronic Service | No | SPL_SL_CIP SPECIAL SERVICE LIST |
| Robyn | Woeste | robynwoeste@alliantenergy.com | Interstate Power and Light Company | 200 First St SE Cedar Rapids, IA 52401 | Electronic Service | No | SPL_SL_CIP SPECIAL SERVICE LIST |