



414 Nicollet Mall
Minneapolis, MN 55401

December 3, 2025

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

—Via Electronic Filing—

RE: PETITION
PROPOSED GENERATOR PROJECTS FOR MISO EXPEDITED RESOURCE
ADDITION STUDY (ERAS)
DOCKET NO. E002/RP-24-67

Dear Ms. Bergman:

Northern States Power Company, doing business as Xcel Energy, submits to the Minnesota Public Utilities Commission the enclosed Petition for approval of three Commission-verified projects for which third-party developers submitted an Expedited Resource Addition Study (ERAS) application to the Midcontinent Independent System Operator (MISO) in support of the Company's resource needs:

- 200 MW Sandhill Energy Storage,
- 300 MW Benton Energy Storage, and
- 45-70 MW of incremental capacity that would result from planned upgrades at the Cannon Falls Energy Center.

These proposed ERAS projects are expected to deliver benefits to our customers by providing the capacity and energy we need to serve them safely, reliably, and affordably.

Specifically, we request that the Commission take the following actions:

- Find that the Company's proposed ERAS 1 project portfolio is in the public interest;
- Approve the Power Purchase Agreements (PPAs) provided with this filing;
- Authorize the Company to recover, through the Fuel Clause Rider, pursuant to Minn. Stat. § 216B.16 subd. 7(3), the Minnesota jurisdictional portion of the costs incurred under the PPAs from Minnesota retail customers; and

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- Establish a procedural schedule such that the Commission may complete deliberations by mid-February 2026, ahead of a substantial non-refundable payment required upon execution of the Generator Interconnection Agreement (GIA).

The Company expects to submit a second Petition in early 2026 requesting approval of additional projects the Commission verified for ERAS and that were submitted and accepted into the MISO ERAS process.

Portions of the Petition, and Attachments A, B and C in their entirety, are marked “Not-Public” as they contain information the Company considers to be trade secret data as defined by Minn. Stat. § 13.37(1)(b). This data includes confidential negotiation details, pricing and other contractual terms. The information has independent economic value from not being generally known to, and not being readily ascertainable by, other parties who could obtain economic value from its disclosure or use.

Specifically, the model Power Purchase Agreement (PPA) is part of the public record through the filed and online 2024 Request for Proposal; this public availability creates a risk that developers could potentially infer the terms we negotiated by comparing the redacted versions to the full model PPA. Although they would not be able to determine the exact specifics of our negotiated terms, they could identify the categories of terms where we deviated from the standard in order to secure the project. This insight, when combined with the public information in our Petition, could adversely impact future contract negotiations and potentially increase costs for our customers. For these reasons, the agreements have been marked “Not-Public” in their entirety, and the Company maintains this information as a trade secret.

Attachments A, B and C are marked “Not-Public” in their entirety. Pursuant to Minn. R. 7829.0500, subp. 3, the Company provides the following description of the excised material:

1. **Nature of the Material:** Attachments A, B and C are PDF copies of agreements between the Company and Sellers for purchases of power to produce electric service.
2. **Authors:** The agreements were drafted by Company’s and Sellers’ legal and business development personnel.
3. **Importance:** The agreements include confidential negotiation details, pricing and other contractual terms. The Sellers and the Company maintain this

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information as trade secret as it has independent economic value from not being generally known to, and not being readily ascertainable by, other parties who could obtain economic value from its disclosure or use.

4. **Date the Information was Prepared:** See the individual agreements for execution dates.

We have electronically filed this document with the Minnesota Public Utilities Commission, and copies have been served on the parties on the attached service list. Please contact Shannon Whiton at shannon.whiton@xcelenergy.com or me at jody.l.londo@xcelenergy.com if you have any questions regarding this filing.

Sincerely,

/s/

JODY L. LONDO
DIRECTOR, REGULATORY AND STRATEGIC ANALYSIS

Enclosures
c: Service List

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REQUIRED INFORMATION

I. SUMMARY OF FILING

A one-paragraph summary is attached to this filing pursuant to Minn. R. 7829.1300, subp. 1.

II. SERVICE ON OTHER PARTIES

Pursuant to Minn. Stat. § 216.17, subd. 3, we have electronically filed this document with the Commission. Pursuant to Minn. R. 7829.1300, subp. 2, the Company has served a copy of this filing on the Department of Commerce and the Office of the Attorney General. A summary of the filing has been served on all parties on the enclosed service list.

III. GENERAL FILING INFORMATION

Pursuant to Minn. R. 7829.1300, subp. 3, the Company provides the following information.

A. Name, Address, and Telephone Number of Utility

Northern States Power Company doing business as:
Xcel Energy
414 Nicollet Mall
Minneapolis, MN 55401
(612) 330-5500

B. Name, Address, and Telephone Number of Utility Attorney

Xcel Energy
Ian M. Dobson
Lead Assistant General Counsel
MN1180-08-MCA
414 Nicollet Mall
Minneapolis, MN 55401
(612) 370-3578

C. Date of Filing

The Company submits this Petition on December 3, 2025 for approval.

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D. Statute Controlling Schedule for Processing the Filing

The PPAs are the end products of a negotiation process. No specific statute imposes a schedule controlling the processing of this filing. Under the Commission’s Rules, this Petition falls within the definition of a “miscellaneous” filing under Minn. R. 7829.0100, subp. 11, since no determination of Xcel Energy’s revenue requirement is necessary. Under Minn. R. 7829.1400, in the absence of a Commission notice establishing a different comment period, a person wishing to comment on a miscellaneous filing shall do so within 30 days of the miscellaneous filing.

E. Utility Employee Responsible for Filing

Xcel Energy
Jody L. Londo
Director, Regulatory and Strategic Analysis
MN1180-07-MCA
414 Nicollet Mall
Minneapolis, MN 55401
(612) 216-7954

IV. MISCELLANEOUS INFORMATION

Pursuant to Minn. R. 7829.0700, the Company requests that the following persons be placed on the Commission’s official service list for this proceeding:

Xcel Energy
Ian M. Dobson
Lead Assistant General Counsel
MN1180-08-MCA
414 Nicollet Mall
Minneapolis, MN 55401
ian.m.dobson@xcelenergy.com

Xcel Energy
Christine Marquis
Regulatory Administrator
MN1180-07-MCA
414 Nicollet Mall
Minneapolis, MN 55401
regulatory.records@xcelenergy.com

Any information requests in this proceeding should be submitted to Christine Marquis at the Regulatory Records email address above.

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STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION

Katie J. Sieben	Chair
Hwikwon Ham	Commissioner
Audrey C. Partridge	Commissioner
Joseph K. Sullivan	Commissioner
John A. Tuma	Commissioner

IN THE MATTER OF XCEL ENERGY'S
2024–2040 UPPER MIDWEST
INTEGRATED RESOURCE PLAN

DOCKET NO. E002/RP-24-67

PETITION

INTRODUCTION

Northern States Power Company, doing business as Xcel Energy, submits this Petition for approval of three Commission-verified projects for which third-party developers submitted an Expedited Resource Addition Study (ERAS) application to MISO in support of the Company's resource needs:

- 200 MW Sandhill Energy Storage,
- 300 MW Benton II Energy Storage, and
- 45-70 MW of incremental capacity that would result from planned upgrades at the Cannon Falls Energy Center.

This Petition follows several prior related filings in this docket:

- Our July 22, 2025 Letter requesting that the Commission, as the Relevant Electric Retail Regulatory Authority (RERRA), provide verification to the Midcontinent Independent System Operator (MISO) in support of an ERAS for several generator projects.
- Our August 1, 2025 Letter requesting that the Commission provide verification as the RERRA to MISO in support of an ERAS for four additional generator projects.
- Our August 1, 2025 Supplement requesting that the Commission provide verification as the RERRA to MISO in support of an ERAS for two additional generator projects.
- Our September 12, 2025 Letter updating the Commission on the generator projects we requested the Commission to verify as the RERRA to MISO for inclusion in its ERAS process.

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The proposed ERAS projects are expected to deliver benefits to our customers by providing the capacity and energy we need to serve them safely, reliably, and affordably. The portfolio of ERAS projects we present for Commission approval in this Petition will:

- Provide the needed capacity and energy to meet system needs to serve our customers with pricing that aligns with projects selected in recent competitive Requests for Proposals (RFPs);
- Be enabled through the MISO ERAS process, which facilitates timely interconnection of resources to maintain system reliability;
- Reduce carbon emissions;
- Capture a time-sensitive opportunity to leverage federal tax credits;
- Enable renewable integration and improve grid reliability by storing excess energy during periods of surplus and releasing it during peak demand, helping to offset the need for additional peak-generation capacity;
- Provide cost-effective energy storage that supports system operations, enhances power quality, and delivers ancillary services to the regional grid, with pricing that aligns with projects selected in recent competitive RFPs; and
- Create local, union jobs and generate local economic benefits.

Specifically, we request that the Commission take the following actions:

- Find that the Company's proposed ERAS 1 project portfolio is in the public interest;
- Approve the Power Purchase Agreements (PPAs) provided with this filing;
- Authorize the Company to recover, through the Fuel Clause Rider, pursuant to Minn. Stat. § 216B.16 subd. 7(3), the Minnesota jurisdictional portion of the costs incurred under the PPAs from Minnesota retail customers; and
- Establish a procedural schedule such that the Commission may complete deliberations by mid-February 2026, ahead of a substantial non-refundable payment required upon execution of the Generator Interconnection Agreement (GIA).

Finally, we note that the Company expects to submit a second Petition in early 2026 requesting approval of additional projects the Commission verified for ERAS and that were submitted and accepted into the MISO ERAS process.

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EXECUTIVE SUMMARY

With this filing, we are pleased to present a portfolio of projects that third-party developers submitted ERAS applications to MISO in support of the Company's resource needs for the following Commission-verified projects:

- 200 MW Sandhill Energy Storage,
- 300 MW Benton II Energy Storage, and
- 45-70 MW of incremental capacity that would result from planned upgrades at the Cannon Falls Energy Center.

Together, these projects represent an investment that will deliver numerous benefits to our customers while providing the capacity and energy needed to serve them safely, reliably, and affordably.

Despite a challenging landscape, including industry-wide cost pressures, global supply chain disruptions, labor market constraints, and evolving trade policies, the proposed projects reflect a strategic commitment to Minnesota's energy future. The Cannon Falls expansion will provide essential firm dispatchable capacity with only a minimal increase in carbon emissions. The storage projects will enhance grid flexibility and resilience, support renewable integration, and strengthen system reliability. Further, the projects will create high-quality, union jobs and generate lasting economic benefits for local communities. Taking timely action allows the Company to leverage the expedited MISO ERAS interconnection process and capture time-sensitive federal tax incentives, minimizing costs for our customers while reinforcing our ability to deliver safe, reliable, and affordable electric service.

Therefore, we respectfully request that the Commission approve the portfolio of ERAS projects as detailed in this Petition.

I. DESCRIPTION AND PURPOSE OF FILING

A. ERAS Process Background

In March 2025, MISO submitted a proposal to the Federal Energy Regulatory Commission (FERC) to establish the ERAS process – a framework designed to accelerate the interconnection study of generation projects that address urgent near-term resource adequacy and reliability needs, in contrast to MISO's standard

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Generation Interconnection queue. In May 2025, FERC rejected MISO’s ERAS proposal, citing concerns that it lacked sufficient limitations on the number of projects that could qualify for the expedited process.

On June 6, 2025, MISO submitted a revised ERAS proposal, incorporating changes intended to address FERC’s concerns.¹ In that filing, MISO requested that FERC issue an order by July 22, 2025, and proposed an effective date of August 6, 2025, for the revised tariff provisions. On July 21, 2025, FERC issued an Order Accepting Tariff Revisions, Subject to Condition, effective August 6, 2025.²

MISO’s request for expedited action is intended to provide stakeholders with regulatory certainty and sufficient time to prepare for the first ERAS Quarterly Study Period, which begins on September 2, 2025. Importantly, applications for the first ERAS cycle were accepted by MISO for study on the effective date of August 6 through August 11, 2025. Projects are studied on a first-come, first-serve basis. Additional details on the ERAS Study Cycle timeline are discussed below.

The Commission, acting as the Relevant Electric Retail Regulatory Authority (RERRA), held a Special Meeting on July 24, 2025, to review and verify a portfolio of wind, solar, and storage projects proposed by Xcel Energy, Minnesota Power, and Otter Tail Power for inclusion in the MISO ERAS process. The Commission accepted and delegated authority to issue verification forms for these projects, which are consistent with the utilities’ approved Integrated Resource Plans and Requests for Proposals, and are intended to address urgent resource adequacy and reliability needs in Minnesota. While the Commission’s verification confirms the projects’ eligibility for the ERAS process, it did not constitute final regulatory approval or a finding that the projects are in the public interest; accordingly, we are now requesting formal Commission approval of these projects.

¹ See https://elibrary.ferc.gov/eLibrary/filelist?accession_number=20250606-5228&optimized=false&sid=55a6cd0e-52a6-4562-94d4-9515c0d8d504. See also [Microsoft Word - ERAS Informational Guide](#).

² See *Midcontinent Indep. Sys. Operator, Inc.*, 192 FERC ¶ 61,064 (2025). Available at: <https://elibrary.ferc.gov/eLibrary/filedownload?fileid=00f4c255-0a76-c909-8b03-983013300000>.

The Order is subject to a further compliance filing to clarify that section 3.9.2 of the Generator Interconnection Procedures (GIP) does not cap at 10 the maximum number of ERAS interconnection requests that may be submitted by independent power producers.

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B. ERAS Timeline and Proposed Projects

1. *ERAS Timeline*

The ERAS process is a temporary framework established by MISO to accelerate the interconnection of generation projects that address urgent resource adequacy and reliability needs.³ The process officially began on August 6, 2025, at 8:00 a.m. EST, when MISO opened its online application portal. MISO accepts ERAS applications on a rolling basis. To be considered for a specific quarterly study cycle, applications are required to be submitted at least 15 business days prior to the cycle's kickoff. For the first cycle, which began on September 2, 2025, the application deadline was August 11, 2025. Once submitted, MISO has 15 business days to review applications for completeness. If deficiencies are identified, applicants are notified and given 10 business days to correct them. If deficiencies are not cured by the kickoff date, the project is deferred to a future cycle.

ERAS operates on a quarterly study cycle schedule, with four study periods each year:

- **Quarter 1:** First business day of March through the last business day of May.
- **Quarter 2:** First business day of July through the last business day of August.
- **Quarter 3:** First business day of September through the last business day of November.
- **Quarter 4:** First business day of December through the last business day of February.

Each quarterly cycle is limited to 10 projects, which are selected on a first-come, first served basis and evaluated for geographic and technical compatibility. Notably, MISO has requested FERC approval to expand the quarterly project study limit from 10 to 15 projects.⁴ Projects are evaluated sequentially and are expected to be completed within 60 days of the study kickoff. The ERAS projects undergo the same suite of studies conducted under MISO's Definitive Planning Process.

³ See MISO's *Expedited Resource Addition Study: An overview of how the Expedited Resource Addition Study (ERAS) process will be implemented and the requirements for completing an ERAS application*. Available at <https://cdn.misoenergy.org/ERAS%20Informational%20Guide707493.pdf>

⁴ See MISO *Revisions to the Open Access Transmission, Energy and Operating Reserve Tariff ERAS Quarterly Study Cycle Expansion Filing*, Docket No. ER25-3543-000720263 (September 26, 2025) at: [2025-09-26 Docket No. ER25-3543-000720263.pdf](https://www.ferc.gov/docket/2025-09-26-Docket-No.-ER25-3543-000720263.pdf).

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Following completion of the study, the Generation Interconnection Agreement (GIA) negotiation and issuance process begins. The Interconnection Customer (IC) and Transmission Owner (TO) have 20 business days to negotiate the GIA. MISO then has 10 business days to provide the final Expedited GIA (EGIA). Once the EGIA is issued, the IC and TO have 10 business days to execute it or request that MISO file it unexecuted. MISO then has an additional 10 business days to execute and/or file an unexecute an unexecuted EGIA with FERC.

In total, the ERAS process – from application submission to GIA issuance – is designed to be completed within approximately three calendar months. Based on this timeline, we anticipate GIA negotiations to start in early February 2026 and conclude no later than March 3, 2026. At this time, the developer would be required to make a non-refundable payment of \$24,000/MW.

2. Current ERAS Application Status and Commission Approval Requests

On August 6, 2025, the Company submitted an ERAS application to MISO for the following Commission verified projects:

- 300 MW Nobles Energy Storage and
- 300 MW Sherco South Energy Storage.

Additionally, third-party developers submitted ERAS applications to MISO in support of the Company's resource needs for the following Commission-verified projects:

- 200 MW Sandhill Energy Storage,
- 100 MW Benton II Solar plus 300 MW Benton Energy Storage, and
- 45-70 MW of incremental capacity that would result from planned upgrades at the Cannon Falls Energy Center.

On August 26, 2025, MISO published a preliminary list of ERAS projects, indicating the order the applications were received. At that point in the process, the Study order was subject to change based on the timing of deficiency cures and whether multiple projects impact or resolve the same system constraint, in which case not all may be selected for evaluation. Projects receiving a deficiency notice had until September 2, 2025 to cure the deficiency.

On September 4, 2025, MISO announced the first 10 projects selected for study in ERAS Cycle 1 (2025, Quarter 3).⁵ Selection was based on application submission time,

⁵ See [ERAS Cycle 1717096.pdf](#).

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common constraint review, application withdrawals, and timely cure of application deficiencies. None of the projects the Company proposed for RERRA verification were selected for study in Cycle 1. Although the list of projects to be studied in Cycle 2 has not yet been published, based on the previously published queue information, the Company anticipates that at least one of the projects included in this petition will be selected in Cycle 2, which started on December 1, 2025. MISO has confirmed that applications submitted during the August 6-11, 2025 window for Cycle 1 automatically carry forward into Cycle 2, and applicants did not need to reapply on November 6, 2025 for ERAS Cycle 2 (2025, Quarter 4).

In this petition, we are seeking Commission approval of the Cannon Falls expansion project, Sandhill Battery Energy Storage System (BESS), and Benton II BESS. Additional details on each of the projects are provided in Section IV below. The Company intends to submit an additional petition in early 2026 requesting approval of the two self-build projects in the MISO ERAS process – Nobles BESS and Sherco South BESS, and potentially one additional third-party project the Commission verified for the ERAS process.⁶ The Company is actively working to finalize the Nobles BESS and Sherco South BESS project cost estimates and the third-party agreement for the other project for inclusion in the early 2026 petition.

II. ACQUISITION PROCESS

The ERAS 1 portfolio includes projects that were not sourced through a competitively bid process. However, these projects supplement the Company's recent broader efforts to competitively procure resources, which also served to inform pricing. On June 28, 2024, the Company issued an RFP seeking 1,600 MW of wind, solar, storage, and hybrid resources with commercial operation dates (COD) through 2029 (2024 RFP).⁷ The purpose of this RFP was to select resources to fill an identified system need as identified in the Company's approved 2024 Integrated Resource Plan (IRP) Five-Year Action Plan, and to enable reuse of interconnection rights that will become available as Shero Units 1 and 3 in Becker, Minnesota retire in 2026 and 2030 and Blue Lake Units in Shakopee, Minnesota retire in 2025 and 2026.

⁶ The Sherco South BESS is included in our 2024 RFP Petition in Docket No. E002/M-24-230 and is proposed to interconnect at the Sherburne County Substation using surplus interconnection service. As noted in the 2024 RFP Petition, execution of a separate GIA with MISO would provide valuable accredited capacity for this resource, thereby strengthening its contribution to overall resource adequacy; however, it would also result in additional network upgrade costs.

⁷ Docket No. E002/M-24-230.

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On October 31, 2025, we filed a petition for approval of a portfolio of solar and storage projects selected through our 2024 RFP (2024 RFP Petition). The portfolio includes 768 MW of solar capacity and 855.5 MW / 3,422 MWh of BESS capacity – an investment that will deliver numerous benefits to our customers while providing the capacity and energy needed to serve them safely, reliably, and affordably.⁸

To maintain consistency and ensure cost-effectiveness, indicative pricing from the 2024 RFP has been used to evaluate the ERAS storage projects as further discussed in Section VII.B.

III. STATE OF THE INDUSTRY

The industry continues to face sustained and overlapping cost pressures and uncertainty that impact the economics of generation resources. Global supply chain disruptions, rising demand, labor market constraints, higher interest rates, evolving trade policies, and new tax regulations are collectively increasing project development and operation costs. Combined with global geopolitical uncertainty, these factors have heightened project risk and influenced PPA pricing. While project-specific conditions, sensitivities, and mitigation strategies vary – and not all dynamics affect pricing – a comprehensive discussion of these factors is included in Section II of our 2024 RFP Petition.

IV. PROJECT OVERVIEW AND PAYMENT RATE

We provide an overview of the Cannon Falls expansion, Sandhill BESS, and Benton II BESS projects, together with the applicable payment rates, below.

A. Cannon Falls Expansion

1. Cannon Falls Expansion Project Overview

Cannon Falls is a set of two gas-fired simple cycle combustion turbines, totaling 357 MW in size, located in Cannon Falls, Minnesota that began commercial operation in 2008. Xcel Energy currently purchases the output of Cannon Falls under a pre-existing PPA that is scheduled to expire in 2028. On October 28, 2025, the Company

⁸ Negotiations are ongoing for two selected build-transfer distributed solar projects in Wisconsin – One Energy Portfolio 1 and 2. Both projects are located in Wisconsin and fall under the jurisdiction of the Wisconsin Public Service Commission.

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filed a petition for approval of a new PPA negotiated between the Company and Invenenergy pursuant to the Settlement Agreement reached between parties, and as approved by the Commission in its April 21, 2025 Order (Firm Dispatchable PPA Petition).⁹ The PPA amendment for the expansion is included as Attachment A.

The Cannon Falls project involves upsizing the existing 357 MW natural gas facility to add between 45 and 70 MWs of firm dispatchable capacity to the facility. If approved and successfully constructed, the commercial operation date for this incremental capacity is targeted for June 1, 2028 to align with the new PPA start, subject to the timing and completion of any necessary interconnection-related upgrades identified through the MISO study process.

Project details for the Cannon Falls expansion project are summarized in Table 1 below. Notably, the pricing and terms for the expansion project are incorporated through an amendment to the proposed PPA for the larger facility in the Firm Dispatchable PPA Petition, so the same terms apply to both.

**Table 1
Cannon Falls Expansion Project Details**

Project Type	Natural Gas Simple Cycle CTs
Nameplate Capacity of Expansion	45-70 MW
Developer	Invenenergy Renewables, LLC
Project Location	Cannon Falls, Minnesota
Project Structure	PPA
COD	June 1, 2028
Contract Terms	20 years
PPA Price	[PROTECTED DATA BEGINS
Capacity Price	
Energy Tolling Price	
Turbine Start Payment	
Fired-Hours Payment	PROTECTED DATA ENDS]

⁹ *In the Matter of Northern States Power Company d/b/a Xcel Energy's 2024-2040 Integrated Resource Plan and In the Matter of Xcel Energy's Competitive Resource Acquisition Process for up to 800 Megawatts of Firm Dispatchable Generation*, MPUC Docket Nos. E002/RP-24-67 and E002/CN-23-212, Order Approving Settlement Agreement with Modifications (IRP Order) at Order Points 1 and 14 (April 21, 2025). The Cannon Falls PPA is included as Attachment A to our October 28, 2025 Petition in Docket Nos. E002/RP-24-67 and E002/CN-23-212.

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2. *Cannon Falls Expansion Payment Rate and Terms*

The PPA for the Cannon Falls expansion provides price certainty for additional firm, dispatchable capacity and energy at a price of **[PROTECTED DATA BEGINS**

PROTECTED DATA ENDS] for a 20-year term. Notably, this pricing is consistent with the new Cannon Falls PPA included in the Firm Dispatchable PPA Petition – there is no rate increase for the capacity expansion. The capacity payment is subject to adjustments for actual availability, as corrected for adverse ambient conditions. The monthly capacity payment **[PROTECTED DATA BEGINS**

PROTECTED DATA ENDS]. Capacity payments will be due regardless of the frequency, duration, times, or seasons in which the Company dispatches the project. In addition, the Company will make monthly payments to Invenergy based on the quantity of energy (MWh) the Company dispatches from the project, as well as the number of turbine starts requested by the Company to produce that energy.

As further detailed in the Firm Dispatchable PPA Petition, the proposed Cannon Falls PPA for the larger facility incorporates a range of strengthened key terms compared to the current agreement, which also apply to the expansion project – and are aimed at meaningfully reducing risk to our customers. These enhancements improve performance accountability and more closely align contractual obligations with real-world operating conditions. They are particularly important in ensuring the deliverability of capacity and energy, especially during heightened system conditions.

B. Sandhill Energy Storage

1. *Sandhill BESS Project Overview*

The Sandhill BESS project is a 200 MW / 800 MWh standalone battery energy storage development located in Olmsted County, Minnesota adjacent to the 200 MW Crane BESS project. The 200 MW / 800 MWh Crane BESS project is included in our 2024 RFP Petition requesting Commission approval. The proposed Sandhill BESS project represents a 200 MW / 800 MWh expansion of the Crane project. A site permit application was filed with the Commission on March 5, 2025.¹⁰ Additional

¹⁰ A joint site permit application was filed for the adjacent Crane Energy Storage and the Sandhill Energy Storage projects in Docket Nos. IP-7148/ESS-24-406 and IP-7149/ESS-24-407.

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project details are summarized in Table 2 below. The proposed PPA with Tenaska for the Sandhill BESS project is included as Attachment B.

**Table 2
Sandhill BESS Project Details**

Project Type	BESS
Nameplate Capacity	200 MW/800 MWh
Developer	Tenaska
Project Location	Olmsted County, Minnesota
Project Structure	PPA
Target COD	December 31, 2028, contingent on the execution of a GIA
Contract Terms	15 years
	[PROTECTED DATA BEGINS
Fixed or escalating price	
Capacity Price	
	PROTECTED DATA ENDS]
Estimated construction jobs*	137 (direct) + 92 (indirect)
Estimated landowner payments*	\$1.2 million
Estimated local tax payments*	\$2.28 million (County) \$17.0 million (State)

* Estimates provided by the project developer.

2. *Sandhill BESS Payment Rate*

The 200 MW / 800 MWh Sandhill BESS PPA includes fixed capacity payments of **[PROTECTED DATA BEGINS** **PROTECTED DATA ENDS]** for a 15-year term. The fixed capacity payment is subject to performance adjustment mechanisms described in Section V.A below and outlined in the PPA included as Attachment B. Further, **[PROTECTED DATA BEGINS**

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C. Benton II Energy Storage

1. Benton II BESS Project Overview

The Benton II BESS project is a 300 MW / 1,200 MWh standalone battery energy storage development located in Benton County, Minnesota. The original 100 MW Benton Solar project was bid into the Company's 2024 RFP but withdrew after being shortlisted, having secured an alternative offtake agreement with another party. The proposed Benton II Solar and Benton II BESS projects represent an additional 100 MW of solar capacity and 300 MW / 1,200 MWh of storage, intended to supplement the original project. However, the Company is proceeding only with the Benton II BESS portion, as the solar component was ultimately determined to be cost-prohibitive. The proposed PPA with NextEra for the Benton II BESS project is included as Attachment C.

NextEra plans to file a site and route permit application for the project with the Commission in the first quarter of 2026. Additional project details are summarized in Table 3 below.

¹¹ **[PROTECTED DATA BEGINS
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**Table 3
Benton II BESS Project Details**

Project Type	BESS
Nameplate Capacity	300 MW / 1,200 MWh
Developer	NextEra
Project Location	Benton County, Minnesota
Project Structure	PPA
Target COD	May 31, 2029
Contract Terms	15 years
	[PROTECTED DATA BEGINS
Fixed or escalating price	
Capacity Price	
	PROTECTED DATA ENDS]
Estimated construction jobs*	250
Estimated landowner payments*	\$450,000
Estimated local tax payments*	\$60 million

** Estimates provided by the project developer.*

2. *Benton II BESS Payment Rate*

The 300 MW / 1,200 MWh Benton II BESS PPA includes fixed capacity payments of **[PROTECTED DATA BEGINS** **PROTECTED DATA ENDS]** for a 15-year term. The fixed capacity payment is subject to performance adjustment mechanisms described in Section V.A below and outlined in the forthcoming PPA. Further, **[PROTECTED DATA BEGINS**

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V. STORAGE PPA TERMS

Through prudent contracting practices and negotiations with developers, we have identified, assessed, and mitigated major risks, while maximizing potential benefits through the contract terms. Below, we outline key terms of our energy storage agreements.

A. Performance Adjustment Mechanisms for BESS Projects

The Sandhill and Benton II BESS PPAs include several performance-based adjustment mechanisms that align with the RFP model PPA. These provisions are designed to ensure that the facility delivers reliable, high-quality service and that payments to the Seller are aligned with actual performance. The mechanisms described below are structured to align Seller compensation with actual system performance, incentivize high availability and efficiency, and provide flexibility for operational realities.

1. Capacity Availability Factor (CAF) Adjustment

The monthly capacity payment varies based on the actual availability of the project each month. The CAF reflects the actual available capacity of the battery storage system, adjusted for scheduled maintenance. If the facility is unavailable due to forced outages or underperformance, the Seller's payment will be reduced accordingly. This mechanism incentivizes the Seller to maximize system availability and reliability throughout the contract term.

2. Round Trip Efficiency Adjustment

The contract requires the battery storage system to meet its committed round-trip efficiency (RTE) levels each year. RTE is the ratio of energy discharged compared to energy charged reflecting the efficiency of the project's charging capabilities. If the actual RTE falls below guaranteed levels, the monthly payment is reduced. This ensures that the Seller is financially motivated to maintain the battery's efficiency over time.

3. Excess Throughput

If the battery is discharged above the annual throughput limit, the Seller is entitled to an additional payment for each megawatt-hour (MWh) of excess energy delivered as shown in Table 4 below.

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**Table 4
Excess Energy Payment by Project**

Project	Payment for Energy Above Annual Throughput Limit
Sandhill BESS	[PROTECTED DATA BEGINS
Benton II BESS	PROTECTED DATA ENDS]

These payments provide an incentive for the Seller to make the system available even beyond its planned throughput, while also protecting the facility from overuse that could degrade the asset.

4. Penalties for Failure to Respond to Dispatch

If the Seller fails to accurately or timely respond to a dispatch notice, and the market operator imposes a penalty or charge on the Company as a result, the Company may pass through those charges to the Seller by reducing the next monthly payment.

B. Development Milestones and Other Key PPA Terms

1. Critical Path Development Milestones

The PPAs require the achievements of certain milestones – referred to as “Critical Path Development Milestones” – that are critical to the successful and timely development of the project. If a project misses, or is anticipated to miss, a critical milestone, the Seller must establish a recovery plan to restore the project’s schedule. Failure to meet these milestones by the specified deadline will result in liquidated delay damages. Further, if a project does not achieve COD by its target date, it will again be subject to liquidated delay damages. In the event a project fails to achieve COD altogether, the Company can terminate and collect damages for termination.

2. Security Fund

Our PPAs require Sellers to fund and maintain security in favor of the Company following execution and throughout development and the term of the contract (Security Fund). The Company may draw from this Security Fund to recover amounts

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owed to the Company for liquidated delay damages, actual damages, and liquidated damages for failure to reach the Critical Path Development Milestones or failure to achieve COD.

3. *Labor*

The 2024 RFP required all bidders to utilize union labor for the construction of the facility, and such remains a provision of the proposed PPAs as well.

C. Relief Mechanisms Associated with Geopolitical Uncertainty

As indicated above, the industry is facing tremendous uncertainty. This unprecedented uncertainty includes trade measures, tariff imposition, tax credits, tax qualifications, federal permitting, import restrictions and foreign entity concerns just to name a few. As such, the Company recognizes that granting practical and limited relief mechanisms in an effort to stabilize and promote the continued development of new resources is necessary and prudent at this time. Generally, the Company determined that three primary components are driving project geopolitical uncertainty currently. First, ever-changing tariffs and trade measures make it very challenging to lock-in definitive equipment costs for project development. Second, the uncertainty surrounding tax incentives for renewable energy development has made modeling a project's economics very challenging without taking on significant financial risk. And third, federal action challenging project permitting not only threatens a project's schedule but ultimately could prevent a project from being constructed all-together.

In consideration of the above, each of the new construction resources in this portfolio – Sandhill and Benton II BESS – has been granted the relief mechanisms described below. The relief incorporates a comprehensive set of mechanisms and safeguards designed to address regulatory uncertainty, evolving reliability standards, and macro-economic disruptions. These relief mechanisms provide a balanced framework that protects both the Seller and our customers from extraordinary external risks while maintaining project viability and ensuring timely delivery of contracted services. The relief mechanisms are consistent with those offered to all selected bidders in the 2024 RFP as well as the Company's other current resource solicitations pending with the Commission.¹²

¹² This approach aligns with Commission Orders in other similar matters. See *In the Matter of the Petition of Northern States Power Company, d/b/a Xcel Energy, for Approval of Sherco Solar 3 and Apple River Solar Power Purchase Agreement*, Docket No. E002/M-22-403 at Order Point 5a (October 23, 2023) and *In the Matter of the Petition of Minnesota Power for Approval of Investments and Expenditures in the Boswell Solar Projects for Recovery through Minnesota Power's Renewable Resources Rider under Minn. Stat. § 216B.1645*, at Order Point 5 (May 13, 2025).

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1. *Specified Change in Tax Law*

If a change in tax law (for example, a repeal of a clean energy tax credit) prevents the Seller from realizing investment or production tax credit benefits and the financial impact exceeds a material threshold relative to the size of each project, then Seller has the opportunity to exit the contract, forfeiting a portion of the Security Fund. Prior to termination, both parties must engage in a 90-day negotiation period to amend the PPA in an effort to continue with the project prior to terminating. The Seller can be granted up to 75 days of COD delay during the process. Any such change in tax law triggering the relief is subject to verification by an Independent Auditor.

2. *Extraordinary Federal Action*

If the Seller is unable to reach COD due to a federal permit being withheld or denied, the Seller is granted a day-for-day extension. For example, if a presidential executive order causes the delay or otherwise makes construction impossible, then the Seller may extend their planned in-service dates to allow additional time to obtain such permit. If the delay continues and COD still cannot be achieved within a year, then either party has the opportunity to exit the contract without penalty.

3. *New Trade Measure Event*

If a new or modified import tariff is imposed on the project's major components, the Seller may request a rate increase capped at no more than 20 percent to account for the new tariff impact. Each new tariff and requested rate increase must be verified by an Independent Auditor. The Independent Auditor shall be granted the opportunity to review Seller's major equipment and determine the validity and impact of any new tariff. If the Independent Auditor denies the new tariff, or if Seller's calculation of the rate increase is determined by the Independent Auditor as materially inaccurate or otherwise in bad faith, no rate increase will be granted. The Seller has the right to submit multiple requests for different tariff events and is granted up to 75 days of COD delay during the review process. If the Independent Auditor verifies the new tariff event and also verifies Seller's calculation of the rate increase, then the rate increase will be automatically applied to the PPA for the remainder of the term.

VI. LEASE ARRANGEMENTS

As discussed in the Firm Dispatchable PPA and 2024 RFP Petitions, the Company's proposed PPAs are structured to provide reliable, dispatchable capacity at a reasonable

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cost, with enforceable performance standards and milestone requirements that protect customers from underperformance and cost escalation, as further described in Section V.

However, PPAs, particularly those for resources with dispatch rights and capacity-based payments, have the potential to create long-term financial obligations in the form of operating or finance leases, which is the case for some of the projects stemming from this resource acquisition that we are requesting the Commission to approve. When assessing financial risk, credit rating agencies may treat a portion of the future payments due on these lease arrangements, or otherwise ‘lease obligations’ as *imputed debt*, effectively adding them to the Company’s reported debt to get a more complete picture of its financial leverage.

When the credit rating agencies add these debt-like obligations to reported debt, key financial metrics, such as the cash flow to debt ratio, worsen. This change signals higher financial risk and can lead to lower credit ratings, which in turn increase the Company’s borrowing costs on new debt. Given the Company’s anticipated need to raise several billion dollars of long-term debt financing over the next five years, even marginal changes in the cost of debt will have material and sustained financial impacts on customers. Table 5 below presents the estimated amount of imputed debt and key credit ratio impacts expected by 2029, when all the contracts are active.

Table 5
Estimated Credit Metric Impact¹³

Project	Lease Type	2029 Imputed Debt (\$ millions)	2029 Impact to FFO / Debt
Sandhill Energy Center	Operating	\$247	Approx. -0.33%
Benton II Energy Storage	Operating	\$378	Approx. -0.63%
Total		\$625	Approx. -0.96%

The Company can mitigate the negative impact of incremental imputed debt through two primary avenues. Since ratings agencies closely monitor the relationship between cash flow from operations and total debt, the Company can either: (1) aim to reduce its overall debt burden, or (2) increase its operational cash flow. The debt burden

¹³ Lease arrangement impacts attributed to the Cannon Falls facility are discussed in the Firm Dispatchable RFP Petition.

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could be reduced by managing the Company to a higher authorized equity ratio. Cash flow could be increased by either increasing return on equity (ROE) or accelerating book depreciation on capital assets. The equity ratio is the most cost-efficient option for managing credit quality, as it reduces the proportion of debt and increases cash flow, while displacing interest expense charged to customers.

Due to the material negative credit quality implications expected as a result of these contracts, the Company intends to propose mitigation through an increase in its equity ratio in its next electric rate case filing.

VII. DEMONSTRATION OF NEED AND ECONOMIC ANALYSIS

A. Demonstration of Need for ERAS Projects

The ERAS projects in this Petition are consistent with our approved 2024 IRP and align with both Xcel Energy's and Minnesota's clean energy transition strategy. The Five-Year Action Plan of our recently approved 2024 IRP includes the addition of significant levels of wind, solar, and storage resources in addition to the Firm Dispatchable resources approved in the IRP Order.

Further, the Company's updated resource modeling conducted for the 2024 RFP confirms that additional capacity is required to maintain reliability and meet customer demand under current and projected system conditions. As described below, the updated analysis indicates a significant increase in resource needs compared to our 2024 IRP. This increase is driven by sustained load growth and the anticipated expiration of federal tax incentives after 2030.

In our updated modeling for the 2024 RFP, the Company removed 1,600 MW of generic resources through 2030 to create a capacity void that the 2024 RFP proposed portfolio of 1,624 MWs is intended to fill. We then locked in the remaining 1,860 MW of generic resources through 2029 and allowed the model to select additional resources in 2030. These locked-in generic resources are intended to represent a minimal proxy for acquisitions through the Development Transfer RFP and potential ERAS projects. By allowing the model to select additional resources in 2030, we are able to access future needs under updated assumptions that reflect practical timing constraints for new resource additions beyond those contemplated in current resource acquisition processes.

A summary of the additional resources based on the IRP and the updated 2024 RFP modeling using the updated load forecast is shown in Table 6 below.

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Table 6
Updated Five-Year Action Plan

	Approved Five-Year Action Plan (MWs)	Proposed 2024 RFP Portfolio, Dev Transfer and ERAS Project Included in Analysis
Standalone Storage	600	916
Wind	3,200	1,800
Solar	400	768
Total	4,200	3,484
Remaining Wind/Solar/Storage Need Based on IRP		716
Updated Remaining Wind/Solar/Storage Need		3,500

The updated modeling demonstrates that even with the inclusion of the proposed 2024 RFP portfolio and proxy resources, the system requires an additional 3,500 MW of resources by 2030. This result underscores the value of near-term procurement.

Accordingly, the proposed ERAS projects will provide valuable contributions to meeting capacity requirements, maintaining system reliability, and mitigating exposure to future cost volatility. The ERAS process is a valuable tool to help bring these resources onto the grid in a timely manner.

B. BESS Project Cost Parity with 2024 RFP Projects

As indicated in Section IV.A.1, the pricing and terms for the Cannon Falls expansion project are incorporated through an amendment to the proposed PPA for the larger facility in the Firm Dispatchable PPA Petition.

The Sandhill and Benton II BESS projects are consistent with our approved 2024 IRP and support both Xcel Energy’s and Minnesota’s clean energy transition strategy. As shown in Table 7 below, the PPA pricing for these resources aligns with pricing in our 2024 RFP.

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**Table 7
2024 RFP and Proposed ERAS Project BESS Pricing**

Project	Size (MW)	Cost of Capacity (\$/kw-month)
		[PROTECTED DATA BEGINS
Blue Lake BESS	135.5	
Sherco South BESS	300	
Crowned Ridge BESS	120	
Crane BESS	200	
Mayhew BESS	100	
Sandhill BESS	200	
Benton II BESS	300	
		PROTECTED DATA ENDS]

C. EnCompass Analysis of Projects

In order to determine the benefits provided by the ERAS projects, the Company conducted an additional economic analysis using updated EnCompass modeling.

1. Model Updates Incorporated for Analysis

The updated base case builds on the EnCompass modeling submitted in the 2024 RFP filing, as described in Section XI of the 2024 RFP Petition, with appropriate changes to modeling inputs and assumptions to reflect the update of important input assumptions and the continued refinement of our modeling practices. Specifically, we updated the model for the following:

- **Resource updates:**

Consistent with the 2024 RFP modeling and our approved IRP Settlement Agreement, the model includes the Lyon County CT, Cannon Falls PPA extension, MEC 1 PPA extension with BESS, North Star Battery, Sherco West battery, and the portfolio of proposed projects in the 2024 RFP Petition. The model also includes the Wind Development Transfer projects using generic resource costs without transmission.¹⁴ No additional generic CT additions were

¹⁴ Docket No. E002/M-23-342.

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available before 2030. Plum Creek Wind and Lake Wilson Solar and Storage were removed to reflect the current resource mix.

- **Open capacity purchase at CONE and energy purchase between 2027 and 2029:**

Between 2027 and 2029, the model allows market purchases of capacity at MISO’s current Cost of New Entry (CONE) and energy from the market reflecting an alternative that may be theoretically available to the Company in the absence of the ERAS portfolio projects. Further, unlike an assumed generic or alternative contract/project life extension, it is a cost that is publicly known and can be easily sized by the model in order to balance reserve margin needs while solving for the least-cost generation mix. This assumption was necessary to develop the baseline capacity expansion plan.

- **Market capacity and energy purchases are closed beginning in 2030:**

After 2030, the model no longer allows market purchases of capacity or energy to meet system needs. All requirements must be met through owned or contracted resources to reduce exposure to market volatility and ensure compliance with future regulatory requirements. This assumption was necessary to develop the baseline capacity expansion plan.

To complete the baseline scenario, we removed 1,860 MW of generic resources prior to 2030 to create a capacity void, locking in 400 MW of generic solar at King in 2030 consistent with the approved resource targets in our last resource plan. Finally, six wind projects with total capacity of 1,506 MW were forced into the base expansion plan as proxies for resources the Company expects to acquire through the Development Transfer RFP.¹⁵

2. *EnCompass Analysis of ERAS Portfolio*

After we created the baseline capacity expansion plan – including assumed capacity purchases in any years where the reserve margin would not otherwise be met – we performed a PVRR and PVSC production cost run to establish a comparison basis for the ERAS projects. This evaluation considered scenarios both with and without the consideration of the future regulatory costs of carbon. The baseline run uses the latest load forecast (2025v2), and assumes production tax credits (PTCs) for generic resources through 2030 and no PTCs beyond 2030, to evaluate the resulting planning impacts.

¹⁵ Documentation of our updated demand and energy forecasts and generic resource costs are included as Attachment O to our 2024 RFP Petition.

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For the ERAS portfolio evaluation, the portfolio of ERAS projects was forced into the model, and market purchase of capacity and energy was turned off. The ERAS portfolio model run provides a capacity expansion plan – including the selected projects – that can then be processed through production cost modeling to produce PVSC and PVRR results for comparison to the baseline scenario. The PVSC and PVRR results are then compared to the baseline values described above to determine the total benefits or costs of the ERAS portfolio relative to the Base Case.

As shown below in Table 8, the results indicate that the ERAS portfolio is expected to provide net benefits on a PVSC basis and modest incremental system costs on a PVRR basis through 2040 and 2050. Further, the proposed ERAS portfolio provides a path to secure additional resource interconnection agreements with MISO on a timely basis, execute on our resource plan, and procure additional resources despite the significant challenges in the market. By procuring the proposed ERAS portfolio, we mitigate the risks of acquiring insufficient capacity and energy and the potential need to procure higher priced resources in the future.

Table 8
PVSC and PVRR Resulting from the ERAS Portfolio (\$2024 millions)

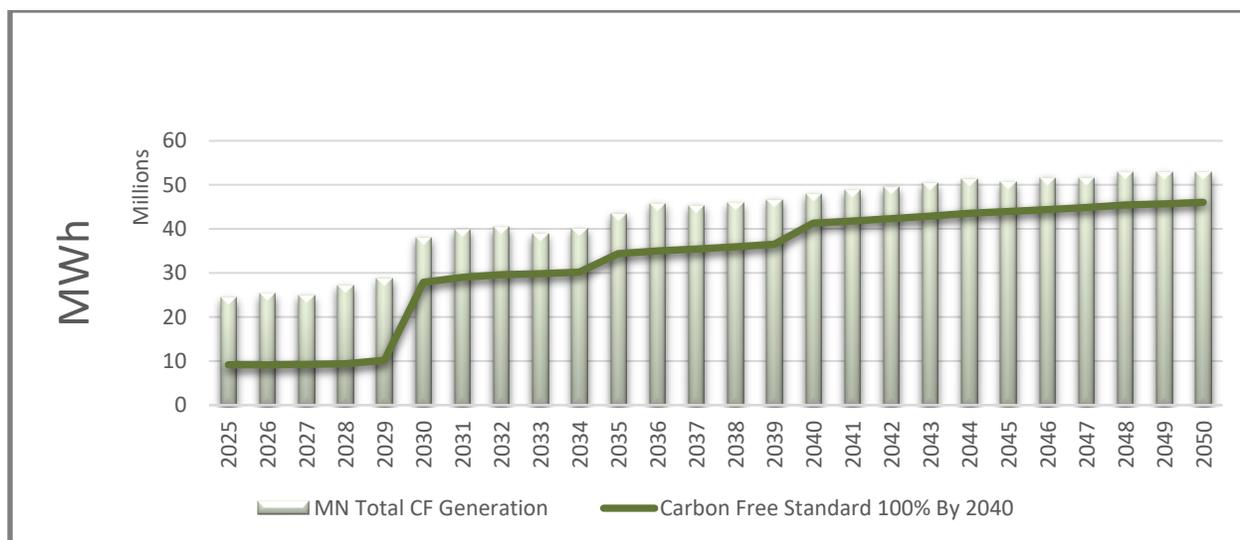
PVSC	Delta from ERAS Base in NPV 2024-2040 Cost/(Savings) (\$ millions)	Delta from ERAS Base in NPV 2024-2050 Cost/(Savings) (\$ millions)
ERAS Base Scenario	--	--
ERAS Portfolio	(\$19)	(\$122)
PVRR	Delta from ERAS Base in NPV 2024-2040 Cost/(Savings) (\$ millions)	Delta from ERAS Base in NPV 2024-2050 Cost/(Savings) (\$ millions)
ERAS Base Scenario	--	--
ERAS Portfolio	\$68	\$30

Reductions in cumulative CO₂ emissions under the ERAS portfolio range from 0.54 million tons on a PVSC basis to 0.78 million tons on a PVRR basis from 2025 to 2040. Further, as shown in Figure 1 below, and based on current resource planning forecasts, the Company projects compliance with the Carbon-Free Standard (CFS) under Minn. Stat. § 216B.1691, subd. 2g. This standard requires that 80 percent of retail sales in Minnesota be generated by carbon-free energy technologies by 2030 and 100 percent of retail sales in Minnesota to be generated by carbon free energy by

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2040. The Company expects to maintain compliance with the CFS beyond 2040 with the addition of the Cannon Falls expansion, Sandhill BESS, and Benton II BESS.

Figure 1
Minnesota CFS Compliance Position
Including Cannon Falls Expansion, Sandhill BESS, Benton II BESS



VIII. PPA PROJECTS ARE ELIGIBLE FOR RECOVERY THROUGH THE FUEL CLAUSE RIDER

Pursuant to Minn. Stat. § 216B.16 subd. 7(3), the costs for “fuel used in generation of electricity” are eligible for automatic adjustment under the Fuel Clause Rider. Under the terms of our currently effective Fuel Clause Rider in our tariff, “[t]he energy cost of purchases from a qualifying facility” are “qualifying costs” that comprise the Cost of Energy. Because the projects satisfy the conditions of a qualifying facility (QF), the Company plans to recover the costs of these PPAs through our Fuel Clause Rider. No net increase in revenue to Xcel Energy will result from these transactions, as the power purchases will equal the revenue collected.

CONCLUSION

In this filing, we have discussed a portfolio of firm dispatchable and storage projects that are in the public interest. The portfolio of ERAS projects we present for Commission approval in this Petition will:

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- Provide the needed capacity and energy to meet system needs to serve our customers with pricing that aligns with projects selected in recent competitive RFPs;
- Be enabled through the MISO ERAS process, which facilitates timely interconnection of resources to maintain system reliability;
- Reduce carbon emissions;
- Capture a time-sensitive opportunity to leverage federal tax credits;
- Enable renewable integration and improve grid reliability by storing excess energy during periods of surplus and releasing it during peak demand, helping to offset the need for additional peak-generation capacity;
- Provide cost-effective energy storage that supports system operations, enhances power quality, and delivers ancillary services to the regional grid, with pricing that aligns with projects selected in recent competitive RFPs; and
- Create local, union jobs and generate local economic benefits.

Specifically, we request that the Commission take the following actions:

- Find that the Company's proposed ERAS 1 project portfolio is in the public interest;
- Approve the Power Purchase Agreements (PPAs) provided with this filing;
- Authorize the Company to recover, through the Fuel Clause Rider, pursuant to Minn. Stat. § 216B.16 subd. 7(3), the Minnesota jurisdictional portion of the costs incurred under the PPAs from Minnesota retail customers; and
- Establish a procedural schedule such that the Commission may complete deliberations by mid-February 2026, ahead of a substantial non-refundable payment required upon execution of the GIA.

Dated: December 3, 2025

Northern States Power Company

STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION

Katie J. Sieben	Chair
Hwikwon Ham	Commissioner
Audrey C. Partridge	Commissioner
Joseph K. Sullivan	Commissioner
John A. Tuma	Commissioner

IN THE MATTER OF XCEL ENERGY'S
2024–2040 UPPER MIDWEST
INTEGRATED RESOURCE PLAN

DOCKET NO. E002/RP-24-67

PETITION

SUMMARY OF FILING

Please take notice that on December 3, 2025, Northern States Power Company doing business as Xcel Energy filed with the Minnesota Public Utilities Commission a Petition requesting approval of Power Purchase Agreements for three projects: (1) Cannon Falls Energy Center (Cannon Falls) Expansion Project by Invenergy, (2) Sandhill Battery Energy Storage System (BESS) developed by Tenaska, and (3) Benton II BESS developed by NextEra. The Cannon Falls Expansion Project adds 45-70 MW to the two, existing gas-fired combustion turbines totaling 357 megawatts (MW) in size located in Cannon Falls, Minnesota. The Sandhill BESS is a proposed 200 MW BESS located in Olmsted County, Minnesota. The Benton II BESS is a proposed 300 MW BESS located in Benton County, Minnesota.

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Northern States Power Company

Docket No. E002/RP-24-67
Petition – Proposed Generator
Projects for MISO ERAS
Attachments A, B, C

Portions of this Petition, and Attachments A, B and C in their entirety as provided with the Trade Secret version of this filing, are marked “Not-Public” as they contain information the Company considers to be trade secret data as defined by Minn. Stat. § 13.37(1)(b). This data includes confidential negotiation details, pricing and other contractual terms. The information has independent economic value from not being generally known to, and not being readily ascertainable by, other parties who could obtain economic value from its disclosure or use.

Specifically, the model Power Purchase Agreement (PPA) is part of the public record through the filed and online 2024 Request for Proposal; this public availability creates a risk that developers could potentially infer the terms we negotiated by comparing the redacted versions to the full model PPA. Although they would not be able to determine the exact specifics of our negotiated terms, they could identify the categories of terms where we deviated from the standard in order to secure the project. This insight, when combined with the public information in our Petition, could adversely impact future contract negotiations and potentially increase costs for our customers. For these reasons, the agreements have been marked “Not-Public” in their entirety, and the Company maintains this information as a trade secret.

Attachments A, B and C are marked “Not-Public” in their entirety. Pursuant to Minn. R. 7829.0500, subp. 3, the Company provides the following description of the excised material:

1. **Nature of the Material:** Attachments A, B and C are PDF copies of agreements between the Company and Sellers for purchases of power to produce electric service.
2. **Authors:** The agreements were drafted by Company’s and Sellers’ legal and business development personnel.
3. **Importance:** The agreements include confidential negotiation details, pricing and other contractual terms. The Sellers and the Company maintain this information as trade secret as it has independent economic value from not being generally known to, and not being readily ascertainable by, other parties who could obtain economic value from its disclosure or use.
4. **Date the Information was Prepared:** See the individual agreements for execution dates.

[PROTECTED DATA BEGINS

PROTECTED DATA ENDS]

CERTIFICATE OF SERVICE

I, Victor Barreiro, hereby certify that I have this day served copies or summaries of the foregoing documents on the attached list(s) of persons.

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

or

xx electronic filing

Docket No. E002/RP-24-67

Dated this 3rd day of December 2025

/s/

Victor Barreiro
Regulatory Administrator

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
1	Steve	Albrecht	steve.albrecht@shakopeedakota.org	Shakopee Mdewakanton Sioux Community		Shakopee Mdewakanton Sioux Community 2330 Sioux Trail NW Prior Lake MN, 55372 United States	Electronic Service		No	24-67
2	Jared	Alholinna	jaholinna@greenergy.com	Great River Energy		12300 Elm Creek Boulevard Maple Grove MN, 55369 United States	Electronic Service		No	24-67
3	Keith	Anderson	keith.anderson@shakopeedakota.org	Shakopee Mdewakanton Sioux Community		Shakopee Mdewakanton Sioux Community 2330 Sioux Trail NW Prior Lake MN, 55372 United States	Electronic Service		No	24-67
4	Shannon	Anderson	sanderson@solarunitedneighbors.org	Solar United Neighbors			Electronic Service		No	24-67
5	Beren	Argetsinger	bargetsinger@keyesfox.com			PO BOX 166 Burdett NY, 14818 United States	Electronic Service		No	24-67
6	Ray	Auginaush, Sr.	ray.auginaush@whiteearth-nsn.gov	White Earth Nation		White Earth Tribal Headquarters 35500 Eagle View Road Ogema MN, 56569 United States	Electronic Service		No	24-67
7	Mark	Bakk	mbakk@lcp.coop	Lake Country Power		26039 Bear Ridge Drive Cohasset MN, 55721 United States	Electronic Service		No	24-67
8	Daniel	Becchetti	dbecchetti@greenergy.com	Great River Energy		12300 Elm Creek Boulevard Maple Grove MN, 55369 United States	Electronic Service		No	24-67
9	Todd	Beck	tbeck@greenergy.com			null null, null United States	Electronic Service		No	24-67
10	Amadeo	Bellino	amadeo.bellino@whiteearth-nsn.gov	White Earth Nation		White Earth Tribal Headquarters 35500 Eagle View Road Ogema MN, 56569 United States	Electronic Service		No	24-67
11	Melanie	Benjamin	melanie.benjamin@millelacsband.com			43408 Oodena Drive Onamia MN, 56359 United States	Electronic Service		No	24-67
12	Sasha	Bergman	sasha.bergman@state.mn.us		Public Utilities Commission		Electronic Service		No	24-67
13	Laura	Bishop	laura.bishop@state.mn.us		Minnesota Pollution Control Agency	520 Lafayette Rd Saint Paul MN, 55155 United States	Electronic Service		No	24-67
14	Ingrid	Bjorklund	ingrid@bjorklundlaw.com	Bjorklund Law, PLLC		855 Village Center Drive #256	Electronic Service		No	24-67

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						North Oaks MN, 55127 United States				
15	Hunter	Boldt	hunterboldt@redlakenation.org	Red Lake Nation		15484 Migizi Drive Red Lake MN, 56671 United States	Electronic Service		No	24-67
16	Peter	Boney	pboney@boisforte-nsn.gov	Bois Forte Band of Chippewa		Bois Forte Tribal Government 5344 Lakeshore Drive Nett Lake MN, 55772 United States	Electronic Service		No	24-67
17	Sheldon	Boyd	sheldon.boyd@millelacsband.com	Mille Lacs Band of Ojibwe		43408 Oodena Drive Onamia MN, 56359 United States	Electronic Service		No	24-67
18	Jon	Brekke	jbrekke@greenergy.com	Great River Energy		12300 Elm Creek Boulevard Maple Grove MN, 55369-4718 United States	Electronic Service		No	24-67
19	Matthew	Brodin	mbrodin@allete.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	24-67
20	B. Andrew	Brown	brown.andrew@dorsey.com	Dorsey & Whitney LLP		Suite 1500 50 South Sixth Street Minneapolis MN, 55402-1498 United States	Electronic Service		No	24-67
21	Marvin Ray	Bruneau	marvin.bruneau@millelacsband.com	Mille Lacs Band of Ojibwe		43408 Oodena Drive Onamia MN, 56359 United States	Electronic Service		No	24-67
22	Christina	Brusven	cbrusven@fredlaw.com	Fredrikson Byron		60 S 6th St Ste 1500 Minneapolis MN, 55402-4400 United States	Electronic Service		No	24-67
23	Scott	Buchanan	scottbuchanan@fdlrez.com	Fond du Lac Band of Lake Superior Chippewa		1720 Big Lake Road Cloquet MN, 55720 United States	Electronic Service		No	24-67
24	Shelley	Buck	shelley.buck@piic.org	Prairie Island Indian Community		Prairie Island Indian Community 5636 Sturgeon Lake Road Welch MN, 55089 United States	Electronic Service		No	24-67
25	Robert	Budreau	robert.budreau@llojibwe.net	Leech Lake Band of Ojibwe		190 Sailstar Drive NW Cass Lake MN, 56633 United States	Electronic Service		No	24-67
26	Mike	Bull	mike.bull@state.mn.us		Public Utilities Commission	121 7th Place East, Suite 350 St. Paul MN,	Electronic Service		Yes	24-67

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						55101 United States				
27	Cathy	Chavers	cchavers@boisforte-nsn.gov	Bois Forte Band of Chippewa		Bois Forte Tribal Government 5344 Lakeshore Drive Nett Lake MN, 55772 United States	Electronic Service		No	24-67
28	Marc	Child	mchild@greenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	24-67
29	Michael	Childs, Jr.	michael.childsjr@piic.org	Prairie Island Indian Community		Prairie Island Indian Community 5636 Sturgeon Lake Road Welch MN, 55089 United States	Electronic Service		No	24-67
30	John	Coffman	john@johncoffman.net	AARP		871 Tuxedo Blvd. St. Louis MO, 63119-2044 United States	Electronic Service		No	24-67
31	Generic	Commerce Attorneys	commerce.attorneys@ag.state.mn.us		Office of the Attorney General - Department of Commerce	445 Minnesota Street Suite 1400 St. Paul MN, 55101 United States	Electronic Service		Yes	24-67
32	George	Crocker	gwillc@nawo.org	North American Water Office		5093 Keats Avenue Lake Elmo MN, 55042 United States	Electronic Service		No	24-67
33	Rebecca	Crooks Stratton	rebecca.crooks-stratton@shakopeedakota.org	Shakopee Mdewakanton Sioux Community		Shakopee Mdewakanton Sioux Community 2330 Sioux Trail NW Prior Lake MN, 55372 United States	Electronic Service		No	24-67
34	Brooke	Cunningham	health.review@state.mn.us	Minnesota Department of Health		PO Box 64975 St. Paul MN, 55164-0975 United States	Electronic Service		No	24-67
35	Miyah	Danielson	miyahdanielson@fdlrez.com	Fond du Lac Band of Lake Superior Chippewa		1720 Big Lake Road Cloquet MN, 55720 United States	Electronic Service		No	24-67
36	Jason	Decker	jason.decker@llojibwe.net	Leech Lake Band of Ojibwe		190 Sailstar Drive NW Cass Lake MN, 56633 United States	Electronic Service		No	24-67
37	Bobby	Deschampe	robertdeschampe@grandportage.com	Grand Portage Band of Lake Superior Chippewa		PO Box 428 Grand Portage MN, 55605 United States	Electronic Service		No	24-67
38	Kami	Diver	kamidiver@fdlrez.com	Fond du Lac Band of Lake Superior Chippewa		1720 Big Lake Road Cloquet MN, 55720 United States	Electronic Service		No	24-67

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
39	Becky	Dobbs	bdobbs@grenergy.com			null null, null United States	Electronic Service		No	24-67
40	Ian M.	Dobson	ian.m.dobson@xcelenergy.com	Xcel Energy		414 Nicollet Mall, 401-8 Minneapolis MN, 55401 United States	Electronic Service		No	24-67
41	Shane	Drift	sdrift@boisforte-nsn.gov	Bois Forte Band of Chippewa		Bois Forte Tribal Government 5344 Lakeshore Drive Nett Lake MN, 55772 United States	Electronic Service		No	24-67
42	Christopher	Droske	christopher.droske@minneapolismn.gov	Northern States Power Company dba Xcel Energy-Elec		661 5th Ave N Minneapolis MN, 55405 United States	Electronic Service		No	24-67
43	Adam	Duininck	aduininck@ncsrcc.org	North Central States Regional Council of Carpenters		700 Olive Street St. Paul MN, 55130 United States	Electronic Service		No	24-67
44	Wally	Dupuis	wallydupuis@fdlband.org	Fond du Lac Band of Lake Superior Chippewa		1720 Big Lake Road Cloquet MN, 55720 United States	Electronic Service		No	24-67
45	Kevin	Dupuis, Sr.	kevindupuis@fdlrez.com			Reservation Business Committee 1720 Big Lake Rd Cloquet MN, 55720 United States	Electronic Service		No	24-67
46	Jamie	Edwards	jamie.edwards@millelacsband.com	Mille Lacs Band of Ojibwe		43408 Oodena Drive Onamia MN, 56358 United States	Electronic Service		No	24-67
47	Michael	Fairbanks	michael.fairbanks@whiteearth-nsn.gov	White Earth Reservation Business Committee		PO Box 418 White Earth MN, 56591 United States	Electronic Service		No	24-67
48	John	Farrell	jfarrell@ilsr.org	Institute for Local Self-Reliance		2720 E. 22nd St Institute for Local Self-Reliance Minneapolis MN, 55406 United States	Electronic Service		No	24-67
49	Sharon	Ferguson	sharon.ferguson@state.mn.us		Department of Commerce	85 7th Place E Ste 280 Saint Paul MN, 55101-2198 United States	Electronic Service		No	24-67
50	Terri	Finn	terri.goggleye@llojibwe.net			null null, null United States	Electronic Service		No	24-67
51	Christine	Fox	cfox@itasca-mantrap.com	Itasca-Mantrap Coop. Electric Assn.		PO Box 192 Park Rapids MN, 56470 United States	Electronic Service		No	24-67
52	Lucas	Franco	lfranco@liunagroc.com	LIUNA		81 Little Canada Rd E Little Canada MN, 55117 United States	Electronic Service		No	24-67

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
53	Gary	Frazer	gfrazier@mnchippewatribe.org	Minnesota Chippewa Tribe		PO Box 217 Cass Lake MN, 56633 United States	Electronic Service		No	24-67
54	Stacey	Fujii	sfujii@greenergy.com	Great River Energy		12300 Elm Creek Boulevard Maple Grove MN, 55369-4718 United States	Electronic Service		No	24-67
55	Edward	Garvey	garveyed@aol.com	Residence		32 Lawton St Saint Paul MN, 55102 United States	Electronic Service		No	24-67
56	Shannon	Geshick	shannon.geshick@state.mn.us	Minnesota Indian Affairs Council (MIAC)		null null, null United States	Electronic Service		No	24-67
57	Allen	Gleckner	gleckner@fresh-energy.org	Fresh Energy		408 St. Peter Street Ste 350 Saint Paul MN, 55102 United States	Electronic Service		No	24-67
58	Jeffrey	Haase	jhaase@greenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	24-67
59	Hal	Halpern	halhalpern@clpower.com	Cooperative Light & Power		1554 Hwy 2 P0 Box 69 Two Harbors MN, 55616 United States	Electronic Service		No	24-67
60	Jeremy	Hamilton	jhamilton@uppersiouxcommunity-nsn.gov	Upper Sioux Community		Upper Sioux Community PO Box 147 Granite Falls MN, 56241 United States	Electronic Service		No	24-67
61	David A.	Hansen	hansen@federatedrea.coop	Federated Rural Electric Association		77100 U.S. Highway 71 PO Box 69 Jackson MN, 56143 United States	Electronic Service		No	24-67
62	Amy	Hastings	amyh@uppersiouxcommunity-nsn.gov	Upper Sioux Community		5722 Travers Lane PO Box 147 Granite Falls MN, 56241 United States	Electronic Service		No	24-67
63	Erik	Hatlestad	erik@cureriver.org			117 1st St Montevideo MN, 56265 United States	Electronic Service		No	24-67
64	Adam	Heinen	aheinen@dakotaelectric.com	Dakota Electric Association		4300 220th St W Farmington MN, 55024 United States	Electronic Service		No	24-67
65	Kristin	Henry	kristin.henry@sierraclub.org	Sierra Club		2101 Webster St Ste 1300 Oakland CA, 94612 United States	Electronic Service		No	24-67
66	Michael	Hoppe	lu23@ibew23.org	Local Union 23, I.B.E.W.		445 Etna Street Ste. 61 St. Paul MN, 55106 United States	Electronic Service		No	24-67

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
67	Ronald	Horman	rhorman@redwoodelectric.com	Redwood Electric Cooperative		60 Pine Street Clements MN, 56224 United States	Electronic Service		No	24-67
68	Robbie	Howe	robbie.howe@llojibwe.net	Leech Lake Band of Ojibwe		190 Sailstar Drive NW Cass Lake MN, 56633 United States	Electronic Service		No	24-67
69	John	Ihle	ljihle@rrt.net	PlainStates Energy LLC		27451 S Hwy 34 Barnesville MN, 56514 United States	Electronic Service		No	24-67
70	Annie	Jackson	cheryl.jackson@whiteearth-nsn.gov	White Earth Nation		White Earth Tribal Headquarters 35500 Eagle View Road Ogemo MN, 56569 United States	Electronic Service		No	24-67
71	Faron	Jackson, Sr.	faron.jackson@llojibwe.net			190 Sailstar Drive NW Cass Lake MN, 56633 United States	Electronic Service		No	24-67
72	Justin	Jahnz	justin.jahnz@ecemn.com	East Central Energy		412 Main Ave N Braham MN, 55006 United States	Electronic Service		No	24-67
73	Alan	Jenkins	aj@jenkinsatlaw.com	Jenkins at Law		2950 Yellowtail Ave. Marathon FL, 33050 United States	Electronic Service		No	24-67
74	Kevin	Jensvold	kevinj@uppersiouxcommunity-nsn.gov	Upper Sioux Community		PO Box 147 Granite Falls MN, 56241-0147 United States	Electronic Service		No	24-67
75	Annette	Johnson	annette.johnson@redlakenation.org	Red Lake Nation		15484 Migizi Drive Red Lake MN, 56671 United States	Electronic Service		No	24-67
76	Richard	Johnson	rick.johnson@lawmoss.com	Moss & Barnett		150 S. 5th Street Suite 1200 Minneapolis MN, 55402 United States	Electronic Service		No	24-67
77	Sarah	Johnson Phillips	sjphillips@stoel.com	Stoel Rives LLP		33 South Sixth Street Suite 4200 Minneapolis MN, 55402 United States	Electronic Service		No	24-67
78	Mark	Kaminski	mark.kaminski@gsa.gov	General Services Administration		1800 F Street NW Washington DC, 20405 United States	Electronic Service		No	24-67
79	Veda	Kanitz	vmkanitz@gmail.com			null null, null United States	Electronic Service		No	24-67
80	Jenny	Kartes	jkartes@arrowhead.coop	Arrowhead Electric Cooperative, Inc.(P)		PO Box 39 5401 W Hwy 61 Lutsen MN, 55612 United States	Electronic Service		No	24-67

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
81	David	Kempf	dkempf@greenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	24-67
82	William	Kenworthy	will@votesolar.org			1 South Dearborn St Ste 2000 Chicago IL, 60603 United States	Electronic Service		No	24-67
83	Bobby	King	bking@solarunitedneighbors.org	Solar United Neighbors		3140 43rd Ave S Minneapolis MN, 55406 United States	Electronic Service		No	24-67
84	Therese	LaCanne	tlacanne@greenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	24-67
85	Matthew	Lacey	mlacey@greenergy.com	Great River Energy		12300 Elm Creek Boulevard Maple Grove MN, 55369-4718 United States	Electronic Service		No	24-67
86	Arthur	LaRose	arthur.larose@llojibwe.net	Leech Lake Band of Ojibwe		190 Sailstar Drive NW Cass Lake MN, 56633 United States	Electronic Service		No	24-67
87	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	24-67
88	Mark	Larson	mlarson@meeker.coop	Meeker Coop Light & Power Assn		1725 Highway 12 E Ste 100 Litchfield MN, 55355 United States	Electronic Service		No	24-67
89	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	24-67
90	Peder	Larson	plarson@larkinhoffman.com	Larkin Hoffman Daly & Lindgren, Ltd.		8300 Norman Center Drive Suite 1000 Bloomington MN, 55437 United States	Electronic Service		No	24-67
91	Dan	Leshner	dlesher@greenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	24-67
92	Michelle	Lommel	mlommel@greenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	24-67
93	Kavita	Maini	kmaini@wi.rr.com	KM Energy Consulting, LLC		961 N Lost Woods Rd Oconomowoc WI, 53066 United States	Electronic Service		No	24-67

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
94	Christine	Marquis	regulatory.records@xcelenergy.com	Xcel Energy		414 Nicollet Mall MN1180-07-MCA Minneapolis MN, 55401 United States	Electronic Service		No	24-67
95	Shena	Matrious	shena.matrious@millelacsband.com	Mille Lacs Band of Ojibwe		43408 Oodena Drive Onamia MN, 56349 United States	Electronic Service		No	24-67
96	April	McCormick	aprilm@grandportage.com	Grand Portage Band of Lake Superior Chippewa		PO Box 428 Grand Portage MN, 55605 United States	Electronic Service		No	24-67
97	Ronald	Meier	rmeier@mcleodcoop.com	Mcleod Cooperative Power		3515 11th St East Glencoe MN, 55336 United States	Electronic Service		No	24-67
98	Peder	Mewis	pmewis@cleangridalliance.org	Clean Grid Alliance		570 Asbury St. St. Paul MN, 55104 United States	Electronic Service		No	24-67
99	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	24-67
100	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	24-67
101	Stacy	Miller	stacy.miller@minneapolismn.gov	City of Minneapolis		350 S. 5th Street Room M 301 Minneapolis MN, 55415 United States	Electronic Service		No	24-67
102	David	Moeller	dmoeller@allete.com	Minnesota Power			Electronic Service		No	24-67
103	Sarah	Mooradian	sarah@curemn.org	CURE		117 South 1st Street Montevideo MN, 56265 United States	Electronic Service		No	24-67
104	Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP		33 South Sixth St Ste 4200 Minneapolis MN, 55402 United States	Electronic Service		No	24-67
105	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	24-67
106	David	Morrison, Sr.	david.morrison@boisforte-nsn.gov	Bois Forte Band of Chippewa		Bois Forte Tribal Government	Electronic Service		No	24-67

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						5344 Lakeshore Drive Nett Lake MN, 55772 United States				
107	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	24-67
108	Sonny	Myers	smyers@1854treatyauthority.org	1854 Treaty Authority		4428 Haines Rd Duluth MN, 55811-1524 United States	Electronic Service		No	24-67
109	Pouya	Najmaie	najm0001@gmail.com	Cooperative Energy Futures		3416 16th Ave S Minneapolis MN, 55407 United States	Electronic Service		No	24-67
110	Carl	Nelson	cnelson@mncee.org	Center for Energy and Environment		212 3rd Ave N Ste 560 Minneapolis MN, 55401 United States	Electronic Service		No	24-67
111	Deb	Nelson	dnelson@greenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	24-67
112	David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency		220 South Sixth Street Suite 1300 Minneapolis MN, 55402 United States	Electronic Service		No	24-67
113	Duane	Ninneman	duane@cureriver.org	Clean Up the River Environment		117 South 1st St Montevideo MN, 56265 United States	Electronic Service		No	24-67
114	Logan	O'Grady	logrady@mnseia.org	Minnesota Solar Energy Industries Association		2288 University Ave W St. Paul MN, 55114 United States	Electronic Service		No	24-67
115	Joseph	OBrien	joey.obrien@lowersioux.com			39527 Highway 1 Morton MN, 56270 United States	Electronic Service		No	24-67
116	Carol A.	Overland	overland@legalelectric.org	Legalelectric - Overland Law Office		1110 West Avenue Red Wing MN, 55066 United States	Electronic Service		No	24-67
117	Gregory	Padden	gpadden@greenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	24-67
118	Jessica	Palmer Denig	jessica.palmer-denig@state.mn.us		Office of Administrative Hearings	600 Robert St N PO Box 64620 St. Paul MN, 55164 United States	Electronic Service		Yes	24-67
119	Marsha	Parlow	mparlow@greenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove	Electronic Service		No	24-67

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						MN, 55369 United States				
120	Priti	Patel	ppatel@greenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369-4718 United States	Electronic Service		No	24-67
121	Earl	Pendleton	earl.pendleton@lowersioux.com	Lower Sioux Indian Community		39527 Highway 1 Morton MN, 56270 United States	Electronic Service		No	24-67
122	Gordon	Pietsch	gpietsch@greenergy.com	Great River Energy		12300 Elm Creek Blvd. Maple Grove MN, 55369-4718 United States	Electronic Service		No	24-67
123	Joe	Plumer	joe.plumer@redlakenation.org	Red Lake Nation		15484 Migizi Drive Red Lake MN, 56671 United States	Electronic Service		No	24-67
124	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	24-67
125	Robert	Prescott	bob.prescott@lowersioux.com	Lower Sioux Indian Community		39527 Highway 1 Morton MN, 56270 United States	Electronic Service		No	24-67
126	Jody	Puddu	jody.puddu@piic.org	Prairie Island Indian Community		5636 Sturgeon Lake Rd Welch MN, 55089 United States	Electronic Service		No	24-67
127	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	24-67
128	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	24-67
129	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	24-67
130	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	24-67
131	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	24-67

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
132	Nathaniel	Runke	nrunke@local49.org			611 28th St. NW Rochester MN, 55901 United States	Electronic Service		No	24-67
133	Zachary	Ruzycki	zruzycki@grenergy.com	Great River Energy		12300 Elm Creek Boulevard Maple Grove MN, 55369 United States	Electronic Service		No	24-67
134	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	24-67
135	Adam	Savariego	adams@uppersiouxcommunity-nsn.gov	Upper Sioux Community		5722 Travers Lane PO Box 147 Granite Falls MN, 56241 United States	Electronic Service		No	24-67
136	Ronald J.	Schwartau	rschwartau@noblesce.com	Nobles Electric Cooperative		22636 U.S. Hwy. 59 Worthington MN, 56187 United States	Electronic Service		No	24-67
137	Jessie	Seim	jessie.seim@piic.org	Prairie Island Indian Community		5636 Sturgeon Lake Rd Welch MN, 55089 United States	Electronic Service		No	24-67
138	Darrell	Seki, Sr.	dseki@redlakenation.org			15484 Migizi Drive Red Lake MN, 56671 United States	Electronic Service		No	24-67
139	Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates		7400 Lyndale Ave S Ste 190 Richfield MN, 55423 United States	Electronic Service		Yes	24-67
140	Joel	Smith	jsmith@mnchippewatribe.org	Minnesota Chippewa Tribe		PO Box 217 Cass Lake MN, 56633 United States	Electronic Service		No	24-67
141	Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.		76 W Kellogg Blvd St. Paul MN, 55102 United States	Electronic Service		No	24-67
142	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	24-67
143	Roger	Smith, Sr.	rogermsmithsr@fdrez.com			1720 Big Lake Road Cloquet MN, 55720 United States	Electronic Service		No	24-67
144	Beth	Soholt	bsoholt@cleangridalliance.org	Clean Grid Alliance		570 Asbury Street Suite 201 St. Paul MN, 55104 United States	Electronic Service		No	24-67
145	Marie	Spry	mariespry@grandportage.com			PO Box 428 Grand	Electronic Service		No	24-67

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						Portage MN, 55605 United States				
146	Michael	Stalberger	michael.stalberger@blueearthcountymn.gov	Blue Earth County		410 S 5th Street Mankato MN, 56001 United States	Electronic Service		No	24-67
147	LeRoy	Staples Fairbanks III	leroy.fairbanks@llojibwe.net	Leech Lake Band of Ojibwe		190 Sailstar Drive NW Cass Lake MN, 56633 United States	Electronic Service		No	24-67
148	Byron E.	Starns	byron.starns@stinson.com	STINSON LLP		50 S 6th St Ste 2600 Minneapolis MN, 55402 United States	Electronic Service		No	24-67
149	Mark	Strohfus	mstrohfus@grenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	24-67
150	Samuel	Strong	sam.strong@redlakenation.org	Red Lake Nation		15484 Migizi Drive Red Lake MN, 56671 United States	Electronic Service		No	24-67
151	Timothy	Sullivan	tsullivan@whe.org	Wright Hennepin Coop. Electric Assn.		6800 Electric Drive PO Box 330 Rockford MN, 55373 United States	Electronic Service		No	24-67
152	David	Sunderman	daves@benco.org	BENCO (DUPLICATE)		PO Box 8 Mankato MN, 56002-0008 United States	Electronic Service		No	24-67
153	Camille	Tanhoff	kamip@uppersiouxcommunity-nsn.gov	Upper Sioux Community		5722 Travers Lane PO BOX 147 Granite Falls MN, 56241 United States	Electronic Service		No	24-67
154	Tim	Thompson	tthompson@lrec.coop	Lake Region Electric Cooperative		PO Box 643 1401 South Broadway Pelican Rapids MN, 56572 United States	Electronic Service		No	24-67
155	Geoffrey	Tolley	geoff.tolley@gmail.com			855 Stanley Road Two Harbors MN, 55616-1176 United States	Electronic Service		No	24-67
156	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	24-67
157	Jackie	Van Norman	jvannorman@grenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	24-67
158	Sam	Villella	sdvillella@gmail.com			10534 Alamo Street NE Blaine MN, 55449 United States	Electronic Service		No	24-67
159	Carla	Vita	carla.vita@state.mn.us	MN DEED		Great Northern	Electronic Service		No	24-67

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						Building 12th Floor 180 East Fifth Street St. Paul MN, 55101 United States				
160	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	24-67
161	Trent	Waite	twaite@grenergy.com			null null, null United States	Electronic Service		No	24-67
162	Heather	Westra	heather.westra@piic.org	Prairie Island Indian Community		5636 Sturgeon Lake Rd Welch MN, 55089 United States	Electronic Service		No	24-67
163	Steve	White	steve.white@llojbwe.net	Leech Lake Band of Ojibwe		190 Sailstar Drive NW Cass Lake MN, 56633 United States	Electronic Service		No	24-67
164	Cody	Whitebear	cody.whitebear@piic.org	Prairie Island Indian Community		5636 Sturgeon Lake Road Welch MN, 55089 United States	Electronic Service		No	24-67
165	John	Williams	jwilliams@grenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	24-67
166	Virgil	Wind	virgil.wind@millelacsband.com	Mille Lacs Band of Ojibwe		43408 Oodena Drive Onamia MN, 56359 United States	Electronic Service		No	24-67
167	Joseph	Windler	jwindler@winthrop.com	Winthrop & Weinstine		225 South Sixth Street, Suite 3500 Minneapolis MN, 55402 United States	Electronic Service		No	24-67
168	Laurie	York	laurie.york@whiteearth-nsn.gov	White Earth Reservation Business Committee		PO Box 418 White Earth MN, 56591 United States	Electronic Service		No	24-67
169	Curtis	Zaun	czaun@mNSEIA.org	MnSEIA		PO Box 8141 Saint Paul MN, 55108 United States	Electronic Service		No	24-67
170	Kurt	Zimmerman	kwz@ibew160.org	Local Union #160, IBEW		2909 Anthony Ln St Anthony Village MN, 55418-3238 United States	Electronic Service		No	24-67
171	Patrick	Zomer	pat.zomer@lawmoss.com	Moss & Barnett PA		150 S 5th St #1200 Minneapolis MN, 55402 United States	Electronic Service		No	24-67