



January 29, 2025

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VIA E-FILING

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

**Re: In the Matter of an Investigation into Implementing Changes to the Renewable Energy Standard and Newly Created Carbon Free Standard Under Minn. Stat. § 216B.1691
PUC Docket No. E999/CI-23-151**

Dear Mr. Seuffert:

The Minnesota Large Industrial Group (“MLIG”), a continuing ad hoc consortium of large industrial end-users of energy in Minnesota spanning multiple utilities and functioning to represent large industrial interests before regulatory and legislative bodies, submits the following comment pursuant to the Notice of Comment Period and Updated Timeline (“Notice”) issued by the Minnesota Public Utilities Commission (“Commission”) in this matter on October 31, 2024. Specifically, the Commission’s Notice requests comments on the issue of “What clarifications, if any, should the Commission make regarding carbon-free standard compliance reporting and verification under Minn. Stat. § 216B.1691, and sets forth the following topics for comment:

1. When and how should utilities report preparedness for meeting upcoming CFS requirements?
2. By which criteria and standards should the Commission measure an electric utility’s compliance with the CFS?
3. What considerations should the Commission take into account regarding the double counting of Renewable Energy Credits (RECs) to meet multiple requirements?
4. How should net market purchases be counted towards CFS compliance?
5. Are there other issues or concerns related to this matter?

MLIG appreciates the Commission’s engagement on these issues and offers the following comments.

MLIG notes that the questions identified for comment are complex and require additional record development in this matter and also in Docket No. E-999/CI-24-352, *In the Matter of a Commission Investigation into a Fuel Life-Cycle Analysis Framework for Utility Compliance with Minnesota's Carbon-Free Standard*. MLIG intends to more fully address the topics included in the Notice in Reply Comments in reply comments after evaluating the initial comments and proposals submitted by the utilities and other stakeholders.

Initially, however, MLIG encourages the Commission to consider the rate and reliability impacts of compliance with the Carbon-free (“CFS”), Renewable (“RES”) and Solar Standards (“SES”), as described in Minn. Stat. § 216B.1691, subd. 2e, as it determines the parameters for implementation of these standards. Consistency and transparency in the reporting of the cost incurred to achieve compliance with the RES, SES and CFS, and whether reliability is jeopardized, is crucial in allowing the Commission to monitor the pace of investments and determine the magnitude of the exemptions and partial compliance that should be permitted and required.

Uniform Reporting of Cost Impacts

Even before the enactment of the CFS, MLIG has been concerned with customer rates, and MLIG remains concerned the pace of investment necessary to fully comply with the CFS by 2040 could result in unjust and unreasonable rates. As Minnesota Power noted in its pending acquisition proceeding: “Minnesota Power is entering into a historic period where the need to upgrade aging infrastructure and enable the clean energy transformation, combined with significant utility load growth driven by electrification, domestic manufacturing, and advanced computing, results in extremely large capital needs and potential financing challenges” (emphasis added).¹ “The Company has a significant need for capital from investors at levels that are several times the size of historic levels to continue ALLETE’s Sustainability-in-Action Strategy, which seeks to decarbonize Minnesota Power’s generation portfolio while continuing to provide safe, affordable, and reliable electric service to our customers and communities” (emphasis added).² It is clear to MLIG the cost of implementation of the CFS could be prohibitively detrimental to customers and therefore MLIG requests the Commission adopt annual uniform reporting requirements that allow stakeholders to examine the pace of planned investments to ensure just and reasonable rates.

¹ *In the Matter of the Petition of Minnesota Power for the Acquisition of ALLETE by Canada Pension Plan Investment Board and Global Infrastructure Partners*, MPUC Docket No. E-015/PA-24-198 and OAH Docket No. 25-2500-40339, Terms of Acquisition at 4 (Scissons Direct) (December 12, 2024) (eDocket No. 202412-212968-04).

² *In the Matter of the Petition of Minnesota Power for the Acquisition of ALLETE by Canada Pension Plan Investment Board and Global Infrastructure Partners*, MPUC Docket No. E-015/PA-24-198 and OAH Docket No. 25-2500-40339, Capital Needs and Credit Ratings at 3 (Taran Direct) (December 12, 2024) (eDocket No. 202412-212968-05).

The production and presentation of rate impacts is rarely uniform across utility dockets, and the Commission should carefully develop the “uniform reporting system” required in Minn. Stat. §216B.1691, subd. 2e.³ Accordingly, MLIG requests the Commission require utilities to file:

- a reference case scenario, detailing the least cost plan, from a ratepayer impact perspective, for meeting the CFS by 2040 and 2050; and
- a reference case scenario, detailing the least cost plan, from a ratepayer impact perspective, to partially meet the CFS by 2040 and 2050.

MLIG continues to support these requirements as a way to uniformly track the cost of implementation of the 2040 legislation. These two reference case scenarios would give the Commission and intervening parties the information they need to understand the utility’s preferred plan versus other possible plans, with the ability to evaluate (i) the least cost way of meeting the carbon free target by 2040 or a later date; and (ii) the cost mitigation that could result if utilities partially meet the carbon free target.

As part of these reference case requirements, MLIG requests the Commission provide utilities and customers with some expectation as to what is a “reasonable” cost increase, to provide a target or range of costs that are acceptable and in the public interest to achieve compliance with the 2040 legislation. This would provide guidance to utilities and customers as they prepare their IRPs and budgets and allow the Commission to determine in future proceedings whether the actual costs of approved IRPs were reasonable, or whether the pace of investments need to be slowed to maintain affordability.

Uniform Reporting of Reliability Impacts

As important as reasonable cost increases to meet decarbonization targets, reliability cannot suffer as a result of utility efforts to implement the 2040 legislation. The Commission should set specific reporting requirements to establish a framework for evaluating how compliance with the RES, SES and CFS affects system reliability. The Commission should require the utilities to analyze the findings available in their current reliability filings, determine whether implementation of the 2040 bill has caused reliability impacts and file a report annually to outline any changes to their implementation plans necessary to maintain reliability. MLIG believes the current reliability reporting is insufficient to isolate instances attributable to implementation of the 2040 legislation, and therefore a more elaborate framework needs to be created so that the

³ See *In the Matter of an Investigation into Implementing Changes to the Renewable Energy Standard and Newly Created Carbon Free Standard Under Minn. Stat. § 216B.1691*, MPUC Docket No. E999/CI-23-151, MLIG Comment at 5-7 (August 2, 2023) (eDocket No. 20238-197959-02) (requesting Commission require utilities to file certain information in their integrated resource plans (“IRPs”), including (1) the average current rate for each customer class as of the year of the IRP filing, (2) projected rate increases by customer class for each year of the IRP action plan, and (3) the net present value of the utility’s revenue requirement over the life of the plan, under various scenarios, and separately identifying the environmental costs).

Commission can monitor reliability according to benchmarks and metrics to determine whether offramps or partial compliance may be required.

MLIG appreciates the opportunity to comment on these important topics. MLIG respectfully requests the Commission adopt the approaches outlined in this comment to facilitate productive discussions to determine what investments and reliability impacts are reasonable in the implementation of the 2040 legislation.

By copy of this letter, all parties have been served. A Certificate of Service is also attached.

Very truly yours,

Stoel Rives LLP

/s/ Amber S. Lee

Amber S. Lee

ASL:cal
Enclosures

cc: Service List

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CERTIFICATE OF SERVICE

I, Carmel Laney, hereby certify that I have this day served a true and correct copy of the following document(s) to all persons at the addresses indicated below or on the attached list by electronic filing, electronic mail, courier, interoffice mail or by depositing the same enveloped with postage paid in the United States Mail at Minneapolis, Minnesota:

LETTER COMMENT

SUBMITTED ON BEHALF OF MINNESOTA LARGE INDUSTRIAL GROUP (“MLIG”)

In the Matter of an Investigation
into Implementing Changes to the
Renewable Energy Standard and the
Newly Created Carbon Free Standard
under Minn. State 216B.1691
MPUC Docket No. E999/CI-23-151

Dated this 29th day of January, 2025.

/s/ Carmel Laney

Carmel Laney

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129	Casey	Jacobson	cjacobson@bepc.com	Basin Electric Power Cooperative		1717 East Interstate Avenue Bismarck ND, 58501 United States	Electronic Service		No	23-151Official
130	Justin	Jahnz	justin.jahnz@ecemn.com	East Central Energy		412 Main Ave N Braham MN, 55006 United States	Electronic Service		No	23-151Official
131	Alan	Jenkins	aj@jenkinsatlaw.com	Jenkins at Law		2950 Yellowtail Ave. Marathon FL, 33050 United States	Electronic Service		No	23-151Official
132	Nathan	Jensen	njensen@otpc.com	Otter Tail Power Company		215 S. Cascade St. Fergus Falls MN, 56537 United States	Electronic Service		No	23-151Official
133	Kevin	Jensvold	kevinj@uppersiouxcommunity-nsn.gov	Upper Sioux Community		PO Box 147 Granite Falls MN, 56241-	Electronic Service		No	23-151Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						0147 United States				
134	Annette	Johnson	annette.johnson@redlakenation.org	Red Lake Nation		15484 Migizi Drive Red Lake MN, 56671 United States	Electronic Service		No	23-151Official
135	Jody	Johnson	jody.johnson@piic.org	Prairie Island Indian Community		5636 Sturgeon Lake Rd Welch MN, 55089 United States	Electronic Service		No	23-151Official
136	Johnny	Johnson	johnny.johnson@piic.org	Prairie Island Indian Community		5636 Sturgeon Lake Road Welch MN, 55089 United States	Electronic Service		No	23-151Official
137	Richard	Johnson	rick.johnson@lawmoss.com	Moss & Barnett		150 S. 5th Street Suite 1200 Minneapolis MN, 55402 United States	Electronic Service		No	23-151Official
138	Sarah	Johnson Phillips	sjphillips@stoel.com	Stoel Rives LLP		33 South Sixth Street Suite 4200 Minneapolis MN, 55402 United States	Electronic Service		No	23-151Official
139	Nate	Jones	njones@hcpd.com	Heartland Consumers Power		PO Box 248 Madison SD, 57042 United States	Electronic Service		No	23-151Official
140	Nick	Kaneski	nick.kaneski@enbridge.com	Enbridge Energy Company, Inc.		11 East Superior St Ste 125 Duluth MN, 55802 United States	Electronic Service		No	23-151Official
141	Veda	Kanitz	vmkanitz@gmail.com			null null, null United States	Electronic Service		No	23-151Official
142	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	23-151Official
143	David	Kempf	dkempf@grenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	23-151Official
144	William	Kenworthy	will@votesolar.org			1 South Dearborn St Ste 2000 Chicago IL, 60603 United States	Electronic Service		No	23-151Official
145	Becky	Kern	bkern@bepc.com	Basin Electric Power Cooperative		1717 E Interstate Ave Bismarck ND, 58501 United States	Electronic Service		Yes	23-151Official
146	Samuel B.	Ketchum	sketchum@kennedy-graven.com	Kennedy & Graven, Chartered		150 S 5th St Ste 700 Minneapolis MN, 55402 United States	Electronic Service		No	23-151Official
147	Nazir	Khan	nazir@mnejtable.org	Minnesota Environmental Justice Table		2720 E 22nd St Minneapolis MN, 55406 United States	Electronic Service		No	23-151Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
148	Hudson	Kingston	hudson@curemn.org			PO Box 712 Ely MN, 55731 United States	Electronic Service		No	23-151Official
149	Kate	Knuth	kate.knuth@gmail.com			2347 14th Terrace NW New Brighton MN, 55112 United States	Electronic Service		No	23-151Official
150	Frank	Kohlasch	frank.kohlasch@state.mn.us		Minnesota Pollution Control Agency	520 Lafayette Rd N. St. Paul MN, 55155 United States	Electronic Service		No	23-151Official
151	Brian	Kolbinger	brian@beckertownship.org	Becker Township Board		PO Box 248 12165 Hancock St Becker MN, 55308 United States	Electronic Service		No	23-151Official
152	Seth	Koneczny	st.koneczny@smmpa.org	SMPMPA		500 First Avenue, SW Rochester MN, 55902- 3303 United States	Electronic Service		No	23-151Official
153	Brian	Krambeer	bkrambeer@mienergy.coop	MiEnergy Cooperative		PO Box 626 31110 Cooperative Way Rushford MN, 55971 United States	Electronic Service		No	23-151Official
154	Randy	Kramer	rlkramer89@gmail.com	Water and Soil Resources Board		42808 Co. Rd. 11 Bird Island MN, 55310 United States	Electronic Service		No	23-151Official
155	Allen	Krug	allen.krug@xcelenergy.com	Xcel Energy		414 Nicollet Mall-7th fl Minneapolis MN, 55401 United States	Electronic Service		No	23-151Official
156	Kay	Kuhlmann	teri.swanson@ci.red-wing.mn.us	City Of Red Wing		315 West Fourth Street Red Wing MN, 55066 United States	Electronic Service		No	23-151Official
157	Brenda	Kyle	bkyle@stpaulchamber.com	St. Paul Area Chamber of Commerce		401 N Robert Street Suite 150 St Paul MN, 55101 United States	Electronic Service		No	23-151Official
158	Therese	LaCanne	tlacanne@grenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	23-151Official
159	Matthew	Lacey	mlacey@grenergy.com	Great River Energy		12300 Elm Creek Boulevard Maple Grove MN, 55369- 4718 United States	Electronic Service		No	23-151Official
160	Becky	Lammi	cityclerk@ci.aurora.mn.us	City of Aurora		16 W 2nd Ave N PO Box 160 Aurora MN, 55705 United States	Electronic Service		No	23-151Official
161	Carmel	Laney	carmel.laney@stoel.com	Stoel Rives LLP		33 South Sixth Street Suite 4200 Minneapolis	Electronic Service		No	23-151Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						MN, 55402 United States				
162	Arthur	LaRose	arthur.larose@llojibwe.net	Leech Lake Band of Ojibwe		190 Sailstar Drive NW Cass Lake MN, 56633 United States	Electronic Service		No	23- 151Official
163	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	23- 151Official
164	Emily	Larson	elarson@duluthmn.gov	City of Duluth		411 W 1st St Rm 403 Duluth MN, 55802 United States	Electronic Service		No	23- 151Official
165	James D.	Larson	james.larson@avantenergy.com	Avant Energy Services		220 S 6th St Ste 1300 Minneapolis MN, 55402 United States	Electronic Service		No	23- 151Official
166	Mark	Larson	mlarson@meeker.coop	Meeker Coop Light & Power Assn		1725 Highway 12 E Ste 100 Litchfield MN, 55355 United States	Electronic Service		No	23- 151Official
167	Peder	Larson	plarson@larkinhoffman.com	Larkin Hoffman Daly & Lindgren, Ltd.		8300 Norman Center Drive Suite 1000 Bloomington MN, 55437 United States	Electronic Service		No	23- 151Official
168	Rachel	Leonard	rachel.leonard@ci.monticello.mn.us	City of Monticello		505 Walnut St Ste 1 Monticello MN, 55362 United States	Electronic Service		No	23- 151Official
169	Dan	Leshner	dlesher@greenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	23- 151Official
170	Annie	Levenson Falk	annielf@cubminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota Street, Suite W1360 St. Paul MN, 55101 United States	Electronic Service		No	23- 151Official
171	Jesse	Levine	jesse_levine@afandpa.org			1101 K St NW Suite 700 Washington DC, 20005 United States	Electronic Service		No	23- 151Official
172	Amy	Liberkowsky	amy.a.liberkowsky@xcelenergy.com	Xcel Energy		414 Nicollet Mall 7th Floor Minneapolis MN, 55401- 1993 United States	Electronic Service		No	23- 151Official
173	Eric	Lindberg	elindberg@mncenter.org	Minnesota Center for Environmental Advocacy		1919 University Avenue West Suite 515 Saint Paul MN, 55104- 3435 United States	Electronic Service		No	23- 151Official
174	Eric	Lipman	eric.lipman@state.mn.us		Office of Administrative Hearings	PO Box 64620 St. Paul MN, 55164-0620 United States	Electronic Service		Yes	23- 151Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
188	Daryl	Maxwell	dmaxwell@hydro.mb.ca	Manitoba Hydro		360 Portage Ave FL 16 PO Box 815, Station Main Winnipeg MB, R3C 2P4 Canada	Electronic Service		No	23-151Official
189	Tim	McCarthy	tim.mccarthy@siouxvalleyenergy.com	Sioux Valley Southwestern Electric Cooperative, Inc. d/b/a Sioux Valley Energy		null null, null United States	Electronic Service		No	23-151Official
190	Scot	McClure	scotmcclure@alliantenergy.com	Interstate Power And Light Company		4902 N Biltmore Ln PO Box 77007 Madison WI, 53707-1007 United States	Electronic Service		No	23-151Official
191	April	McCormick	aprilm@grandportage.com	Grand Portage Band of Lake Superior Chippewa		PO Box 428 Grand Portage MN, 55605 United States	Electronic Service		No	23-151Official
192	Jess	McCullough	jmccullough@mnpower.com	Minnesota Power		30 W Superior St Duluth MN, 55802 United States	Electronic Service		No	23-151Official
193	Sara G	McGrane	smcgrane@felhaber.com	Felhaber Larson		220 S 6th St Ste 2200 Minneapolis MN, 55420 United States	Electronic Service		No	23-151Official
194	Natalie	McIntire	natalie.mcintire@gmail.com	Wind on the Wires		570 Asbury St Ste 201 Saint Paul MN, 55104-1850 United States	Electronic Service		No	23-151Official
195	Harvey	McMahon	hcmahon@otpc.com	Otter Tail Power Company		215 South Cascade Street Fergus Falls MN, 56537 United States	Electronic Service		No	23-151Official
196	Taylor	McNair	taylor@gridlab.org			668 Capp Street San Francisco CA, 94110 United States	Electronic Service		No	23-151Official
197	Ronald	Meier	rmeier@mcleodcoop.com	Mcleod Cooperative Power		3515 11th St East Glencoe MN, 55336 United States	Electronic Service		No	23-151Official
198	Melanie	Mesko Lee	melanie.lee@burnsvillemn.gov	City of Burnsville		100 Civic Center Parkway Burnsville MN, 55337-3867 United States	Electronic Service		No	23-151Official
199	Peder	Mewis	pmewis@cleangridalliance.org	Clean Grid Alliance		570 Asbury St. St. Paul MN, 55104 United States	Electronic Service		No	23-151Official
200	Joseph	Meyer	joseph.meyer@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	Bremer Tower, Suite 1400 445 Minnesota Street St Paul MN,	Electronic Service		No	23-151Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
212	Sonny	Myers	smyers@1854treatyauthority.org	1854 Treaty Authority		4428 Haines Rd Duluth MN, 55811-1524 United States	Electronic Service		No	23-151Official
213	Ben	Nelson	benn@cmpasgroup.org	CMPMPA		459 South Grove Street Blue Earth MN, 56013 United States	Electronic Service		No	23-151Official
214	Carl	Nelson	cnelson@mncee.org	Center for Energy and Environment		212 3rd Ave N Ste 560 Minneapolis MN, 55401 United States	Electronic Service		No	23-151Official
215	Deb	Nelson	dnelson@greenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	23-151Official
216	David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency		220 South Sixth Street Suite 1300 Minneapolis MN, 55402 United States	Electronic Service		No	23-151Official
217	Duane	Ninneman	duane@cureriver.org	Clean Up the River Environment		117 South 1st St Montevideo MN, 56265 United States	Electronic Service		No	23-151Official
218	Michael	Noble	noble@fresh-energy.org	Fresh Energy		408 Saint Peter St Ste 350 Saint Paul MN, 55102 United States	Electronic Service		No	23-151Official
219	Rolf	Nordstrom	rnordstrom@gpisd.net	Great Plains Institute		2801 21ST AVE S STE 220 Minneapolis MN, 55407-1229 United States	Electronic Service		No	23-151Official
220	Samantha	Norris	samanthanorris@alliantenergy.com	Interstate Power and Light Company		200 1st Street SE PO Box 351 Cedar Rapids IA, 52406-0351 United States	Electronic Service		No	23-151Official
221	M. William	O'Brien	bobrien@mojlaw.com	Miller O'Brien Jensen, P.A.		120 S 6th St Ste 2400 Minneapolis MN, 55402 United States	Electronic Service		No	23-151Official
222	Ric	O'Connell	ric@gridlab.org	GridLab		2120 University Ave Berkeley CA, 94704 United States	Electronic Service		No	23-151Official
223	Joseph	OBrien	joey.obrien@lowersioux.com			39527 Highway 1 Morton MN, 56270 United States	Electronic Service		No	23-151Official
224	Matthew	Olsen	molsen@otpc.com	Otter Tail Power Company		215 South Cascade Street Fergus Falls MN, 56537 United States	Electronic Service		No	23-151Official
225	Russell	Olson	rolson@hcpd.com	Heartland Consumers Power District		PO Box 248 Madison SD, 57042-0248 United States	Electronic Service		No	23-151Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
226	Debra	Opatz	dopatz@otpc.com	Otter Tail Power Company		215 South Cascade Street Fergus Falls MN, 56537 United States	Electronic Service		No	23-151Official
227	Mikayla	Osterman	mosterman@otpc.com	Otter Tail Power Company		215 S Cascade St PO Box 496 Fergus Falls MN, 56537 United States	Electronic Service		No	23-151Official
228	Jamie	Overgaard	jovergaard@minnkota.com	Minnkota Power Cooperative, Inc.		5301 32nd Ave S Grand Forks ND, 58201 United States	Electronic Service		No	23-151Official
229	Carol A.	Overland	overland@legalelectric.org	Legalelectric - Overland Law Office		1110 West Avenue Red Wing MN, 55066 United States	Electronic Service		No	23-151Official
230	Gregory	Padden	gpadden@greenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	23-151Official
231	Jessica	Palmer Denig	jessica.palmer-denig@state.mn.us		Office of Administrative Hearings	600 Robert St N PO Box 64620 St. Paul MN, 55164 United States	Electronic Service		No	23-151Official
232	Marsha	Parlow	mparlow@greenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	23-151Official
233	Priti	Patel	ppatel@greenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369-4718 United States	Electronic Service		No	23-151Official
234	Gerad	Paul	gpaul@minnkota.com	Minnkota Power Cooperative		5301 32nd Ave S Grand Forks ND, 58201 United States	Electronic Service		No	23-151Official
235	Earl	Pendleton	earl.pendleton@lowersioux.com	Lower Sioux Indian Community		39527 Highway 1 Morton MN, 56270 United States	Electronic Service		No	23-151Official
236	Mary Beth	Peranteau	mperanteau@fredlaw.com	Fredrikson & Byron, P.A.		44 East Mifflin Street Suite 1000 Madison WI, 53703 United States	Electronic Service		No	23-151Official
237	Thom	Petersen	thom.petersen@state.mn.us		Minnesota Department of Agriculture	625 North Robert St Saint Paul MN, 55155 United States	Electronic Service		No	23-151Official
238	Luke	Peterson	luke.peterson@hpuc.com	Hibbing Public Utilities Commission		1902 Sixth Ave E Hibbing MN, 55746 United States	Electronic Service		No	23-151Official
239	Neil	Peterson	info@nclucb.org	Northern Counties Land Use Coordinating Board		null null, null United States	Electronic Service		No	23-151Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
240	DONNA	PICKARD	dpickard@aladdinsolar.com	Genie Solar Support Services		1215 Lilac Lane Excelsior MN, 55331 United States	Electronic Service		No	23-151Official
241	Gordon	Pietsch	gpietsch@grenergy.com	Great River Energy		12300 Elm Creek Blvd. Maple Grove MN, 55369-4718 United States	Electronic Service		No	23-151Official
242	Joe	Plumer	joe.plumer@redlakenation.org	Red Lake Nation		15484 Migizi Drive Red Lake MN, 56671 United States	Electronic Service		No	23-151Official
243	J.	Porter	greg.porter@nngco.com	Northern Natural Gas Company		1111 South 103rd St Omaha NE, 68124 United States	Electronic Service		No	23-151Official
244	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	23-151Official
245	Robert	Prescott	bob.prescott@lowersioux.com	Lower Sioux Indian Community		39527 Highway 1 Morton MN, 56270 United States	Electronic Service		No	23-151Official
246	David	Raatz	draatz@bepc.com	Basin Electric Power Cooperative		1717 East Interstate Avenue Bismarck ND, 58501 United States	Electronic Service		No	23-151Official
247	John C.	Reinhardt		Laura A. Reinhardt		3552 26th Ave S Minneapolis MN, 55406 United States	Paper Service		No	23-151Official
248	Victoria	Reinhardt	victoria.reinhardt@co.ramsey.mn.us	Partnership on Waste and Energy		Ramsey County Board Office 15 W. Kellogg Blvd., Ste. 220 St. Paul MN, 55102 United States	Electronic Service		No	23-151Official
249	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	23-151Official
250	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	23-151Official
251	John	Richards	johnrichards@nweco.com	Northwestern Wisconsin Electric Company		104 S. Pine St. Grantsburg WI, 54840 United States	Electronic Service		No	23-151Official
252	Greg	Ridderbusch	greg.ridderbusch@connexusenergy.com	Connexus Energy		14601 Ramsey Boulevard Ramsey MN, 55303 United States	Electronic Service		No	23-151Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
253	Susan	Romans	sromans@allete.com	Minnesota Power		30 West Superior Street Legal Dept Duulth MN, 55802 United States	Electronic Service		No	23-151Official
254	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	23-151Official
255	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	23-151Official
256	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	23-151Official
257	Nathaniel	Runke	nrunke@local49.org			611 28th St. NW Rochester MN, 55901 United States	Electronic Service		No	23-151Official
258	Zachary	Ruzycki	zruzycki@grenergy.com	Great River Energy		12300 Elm Creek Boulevard Maple Grove MN, 55369 United States	Electronic Service		No	23-151Official
259	Mike	Saer	msaer@grenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	23-151Official
260	Robert K.	Sahr	bsahr@eastriver.coop	East River Electric Power Cooperative		P.O. Box 227 Madison SD, 57042 United States	Electronic Service		No	23-151Official
261	Todd	Sailer		Minnetonka Power Cooperative		5301 32nd Ave. S Grand Forks ND, 58201 United States	Paper Service		No	23-151Official
262	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	23-151Official
263	Joseph L	Sathe	jsathe@kennedy-graven.com	Kennedy & Graven, Chartered		150 S 5th St Ste 700 Minneapolis MN, 55402 United States	Electronic Service		No	23-151Official
264	Adam	Savariego	adams@uppersiouxcommunity-nsn.gov	Upper Sioux Community		5722 Travers Lane PO Box 147 Granite Falls MN, 56241 United States	Electronic Service		No	23-151Official
265	John	Saxhaug	john_saxhaug@yahoo.com			3940 Harriet Ave Minneapolis	Electronic Service		No	23-151Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						MN, 55409 United States				
266	Jean	Schafer	jeans@bepc.com	Basin Electric Power Cooperative		1717 E Interstate Ave Bismarck ND, 58501 United States	Electronic Service		No	23-151Official
267	Jeff	Schneider	jeff.schneider@ci.red-wing.mn.us	City of Red Wing		315 West 4th Street Red Wing MN, 55066 United States	Electronic Service		No	23-151Official
268	Mark	Schoennauer	markwsch@hotmail.com			607 19th St NW Apt 17 Rochester MN, 55901 United States	Electronic Service		No	23-151Official
269	Kay	Schraeder	kschraeder@minnkota.com	Minnkota Power		5301 32nd Ave S Grand Forks ND, 58201 United States	Electronic Service		No	23-151Official
270	Kathleen	Schuler	keschuler47@gmail.com			1520 10th Ave S #2 Minneapolis MN, 55404 United States	Electronic Service		No	23-151Official
271	Robert H.	Schulte	rhs@schulteassociates.com	Schulte Associates LLC		1742 Patriot Rd Northfield MN, 55057 United States	Electronic Service		No	23-151Official
272	J.P.	Schumacher	jps@mrenergy.com	Missouri River Energy Services		null null, null United States	Electronic Service		No	23-151Official
273	Kevin	Schumacher	kevin@mrets.org	Midwest Renewable Energy Tracking System		null null, null United States	Electronic Service		No	23-151Official
274	Ronald J.	Schwartau	rschwartau@noblesce.com	Nobles Electric Cooperative		22636 U.S. Hwy. 59 Worthington MN, 56187 United States	Electronic Service		No	23-151Official
275	Christine	Schwartz	regulatory.records@xcelenergy.com	Xcel Energy		414 Nicollet Mall FL 7 Minneapolis MN, 55401-1993 United States	Electronic Service		No	23-151Official
276	Douglas	Seaton	doug.seaton@umwlc.org	Upper Midwest Law Center		8421 Wayzata Blvd Ste 300 Golden Valley MN, 55426 United States	Electronic Service		No	23-151Official
277	Dean	Sedgwick	sedgwick@itascapower.com	Itasca Power Company		PO Box 455 Spring Lake MN, 56680 United States	Electronic Service		No	23-151Official
278	Jessie	Seim	jessie.seim@piic.org	Prairie Island Indian Community		5636 Sturgeon Lake Rd Welch MN, 55089 United States	Electronic Service		No	23-151Official
279	Darrell	Seki, Sr.	dseki@redlakenation.org			15484 Migizi Drive Red Lake MN, 56671 United States	Electronic Service		No	23-151Official
280	Will	Seuffert	will.seuffert@state.mn.us		Public Utilities Commission	121 7th PI E Ste 350 Saint Paul MN, 55101 United States	Electronic Service		Yes	23-151Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
281	Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates		7400 Lyndale Ave S Ste 190 Richfield MN, 55423 United States	Electronic Service		Yes	23-151Official
282	Bria	Shea	bria.e.shea@xcelenergy.com	Xcel Energy		414 Nicollet Mall Minneapolis MN, 55401 United States	Electronic Service		No	23-151Official
283	Andrew R.	Shedlock	andrew.shedlock@kutakrock.com	Kutak Rock LLP		60 South Sixth St Ste 3400 Minneapolis MN, 55402-4018 United States	Electronic Service		No	23-151Official
284	Doug	Shoemaker	dougs@charter.net	Minnesota Renewable Energy		2928 5th Ave S Minneapolis MN, 55408 United States	Electronic Service		No	23-151Official
285	Beth	Smith	bsmith@greatermankato.com	Greater Mankato Growth		1961 Premier Dr Ste 100 Mankato MN, 56001 United States	Electronic Service		No	23-151Official
286	Joel	Smith	jsmith@mnchippewatribe.org	Minnesota Chippewa Tribe		PO Box 217 Cass Lake MN, 56633 United States	Electronic Service		No	23-151Official
287	Joshua	Smith	joshua.smith@sierraclub.org			85 Second St FL 2 San Francisco CA, 94105 United States	Electronic Service		No	23-151Official
288	Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.		76 W Kellogg Blvd St. Paul MN, 55102 United States	Electronic Service		No	23-151Official
289	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	23-151Official
290	Trevor	Smith	trevor.smith@avantenergy.com	Avant Energy, Inc.		220 South Sixth Street Suite 1300 Minneapolis MN, 55402 United States	Electronic Service		No	23-151Official
291	Roger	Smith, Sr.	rogermsmithsr@fdlrez.com			1720 Big Lake Road Cloquet MN, 55720 United States	Electronic Service		No	23-151Official
292	Beth	Soholt	bsoholt@cleangridalliance.org	Clean Grid Alliance		570 Asbury Street Suite 201 St. Paul MN, 55104 United States	Electronic Service		No	23-151Official
293	Anna	Sommer	asommer@energyfuturesgroup.com	Energy Futures Group		PO Box 692 Canton NY, 13617 United States	Electronic Service		No	23-151Official
294	Marie	Spry	mariespry@grandportage.com			PO Box 428 Grand Portage MN, 55605 United States	Electronic Service		No	23-151Official
295	Mark	Spurr	mspurr@fvbenergy.com	International District Energy		222 South Ninth St.,	Electronic Service		No	23-151Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
				Association		Suite 825 Minneapolis MN, 55402 United States				
296	Wallace	St. John, Sr.	wally.stjohn@millelacsband.com	Mille Lacs Band of Ojibwe		43408 Oodena Drive Onamia MN, 56359 United States	Electronic Service		No	23-151Official
297	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	23-151Official
298	Russ	Stark	russ.stark@ci.stpaul.mn.us	City of St. Paul		Mayor's Office 15 W. Kellogg Blvd., Suite 390 Saint Paul MN, 55102 United States	Electronic Service		No	23-151Official
299	Byron E.	Starns	byron.starns@stinson.com	STINSON LLP		50 S 6th St Ste 2600 Minneapolis MN, 55402 United States	Electronic Service		No	23-151Official
300	Cary	Stephenson	cstephenson@otpc.com	Otter Tail Power Company		215 South Cascade Street Fergus Falls MN, 56537 United States	Electronic Service		Yes	23-151Official
301	Mark	Strohfus	mstrohfus@grenergy.com	Great River Energy		12300 Elm Creek Boulevard Maple Grove MN, 55369-4718 United States	Electronic Service		No	23-151Official
302	James M	Strommen	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered		150 S 5th St Ste 700 Minneapolis MN, 55402 United States	Electronic Service		No	23-151Official
303	Samuel	Strong	sam.strong@redlakenation.org	Red Lake Nation		15484 Migizi Drive Red Lake MN, 56671 United States	Electronic Service		No	23-151Official
304	Kent	Sulem	ksulem@mmua.org			3131 Fernbrook Ln N Ste 200 Plymouth MN, 55447-5337 United States	Electronic Service		No	23-151Official
305	Timothy	Sullivan	tsullivan@whe.org	Wright Hennepin Coop. Electric Assn.		6800 Electric Drive PO Box 330 Rockford MN, 55373 United States	Electronic Service		No	23-151Official
306	David	Sunderman	daves@benco.org	BENCO (DUPLICATE)		PO Box 8 Mankato MN, 56002-0008 United States	Electronic Service		No	23-151Official
307	Eric	Swanson	eswanson@winthrop.com	Winthrop & Weinstine		225 S 6th St Ste 3500 Capella Tower Minneapolis MN, 55402-4629 United States	Electronic Service		No	23-151Official
308	Randy	Synsteliën	rsynsteliën@otpc.com	Otter Tail Power Company		215 S Cascade St Fergus Falls MN, 56537 United States	Electronic Service		No	23-151Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
322	Michael	Volker	mvolker@eastriver.coop	East River Electric Power Coop		211 S. Harth Ave Madison SD, 57042 United States	Electronic Service		No	23-151Official
323	Toni	Volkmeier	toni.volkmeier@state.mn.us	MPCA		520 Lafayette Rd. N. St. Paul MN, 55155 United States	Electronic Service		No	23-151Official
324	Trent	Waite	twaite@grenergy.com			null null, null United States	Electronic Service		No	23-151Official
325	Laurance R	Waldoch	larrywaldoch@gmail.com	Attorney		2597 Parkview Dr Saint Paul MN, 55110 United States	Electronic Service		No	23-151Official
326	Greg	Wannier	greg.wannier@sierraclub.org	Sierra Club		2101 Webster St Ste 1300 Oakland CA, 94612 United States	Electronic Service		No	23-151Official
327	Roger	Warehime	roger.warehime@owatonnautilities.com	Owatonna Municipal Public Utilities - Gas		208 S Walnut Ave PO BOX 800 Owatonna MN, 55060 United States	Electronic Service		No	23-151Official
328	Cynthia	Warzecha	cynthia.warzecha@state.mn.us	Minnesota Department of Natural Resources		500 Lafayette Road Box 25 St. Paul MN, 55155-4040 United States	Electronic Service		No	23-151Official
329	Carol	Westergard	cwestergard@otpc.com	Otter Tail Power Company		215 S Cascade St Fergus Falls MN, 56537 United States	Electronic Service		No	23-151Official
330	Heather	Westra	heather.westra@piic.org	Prairie Island Indian Community		5636 Sturgeon Lake Rd Welch MN, 55089 United States	Electronic Service		No	23-151Official
331	Paul	White	paul.white@prcwind.com	Project Resources Corp./Tamarac Line LLC/Ridgewind		618 2nd Ave SE Minneapolis MN, 55414 United States	Electronic Service		No	23-151Official
332	Steve	White	steve.white@llojbwe.net	Leech Lake Band of Ojibwe		190 Sailstar Drive NW Cass Lake MN, 56633 United States	Electronic Service		No	23-151Official
333	Cody	Whitebear	cody.whitebear@piic.org	Prairie Island Indian Community		5636 Sturgeon Lake Road Welch MN, 55089 United States	Electronic Service		No	23-151Official
334	John	Williams	jwilliams@grenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	23-151Official
335	Laurie	Williams	laurie.williams@sierraclub.org	Sierra Club		Environmental Law Program 1536 Wynkoop St Ste 200 Denver CO, 80202 United States	Electronic Service		No	23-151Official

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336	Virgil	Wind	virgil.wind@millelacsband.com	Mille Lacs Band of Ojibwe		43408 Oodena Drive Onamia MN, 56359 United States	Electronic Service		No	23-151Official
337	Joseph	Windler	jwindler@winthrop.com	Winthrop & Weinstine		225 South Sixth Street, Suite 3500 Minneapolis MN, 55402 United States	Electronic Service		No	23-151Official
338	Robyn	Woeste	robynwoeste@alliantenergy.com	Interstate Power and Light Company		200 First St SE Cedar Rapids IA, 52401 United States	Electronic Service		No	23-151Official
339	Sara	Wolff	sara@mnipl.org			710 Linwood Avenue St Paul MN, 55105 United States	Electronic Service		No	23-151Official
340	Tim	Wulling	t.wulling@earthlink.net			1495 Raymond Ave. Saint Paul MN, 55108 United States	Electronic Service		No	23-151Official
341	Laurie	York	laurie.york@whiteearth-nsn.gov	White Earth Reservation Business Committee		PO Box 418 White Earth MN, 56591 United States	Electronic Service		No	23-151Official
342	Kurt	Zimmerman	kwz@ibew160.org	Local Union #160, IBEW		2909 Anthony Ln St Anthony Village MN, 55418-3238 United States	Electronic Service		No	23-151Official
343	Emily	Ziring	eziring@stlouispark.org	City of St. Louis Park		5005 Minnetonka Blvd St. Louis Park MN, 55416 United States	Electronic Service		No	23-151Official
344	Patrick	Zomer	pat.zomer@lawmoss.com	Moss & Barnett PA		150 S 5th St #1200 Minneapolis MN, 55402 United States	Electronic Service		No	23-151Official