

STATE OF MINNESOTA
PUBLIC UTILITIES COMMISSION

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In the Matter of the Application of Xcel Energy for a Certificate of Need for the Mankato - Mississippi River 345kV Transmission Line Project in Southeast Minnesota

Docket No. E002/CN-22-532

**Initial Comments of the Joint Commenters
on the Merits of the Certificate of Need Application**

Clean Grid Alliance, Minnesota Center for Environmental Advocacy, Fresh Energy, Sierra Club, Clean Energy Economy Minnesota, Center for Rural Affairs, Union of Concerned Scientists, the National Audubon Society, and the Citizens Utility Board of Minnesota (collectively, the “Joint Commenters”) respectfully submit these Initial Comments in response to the Minnesota Public Utilities Commission’s (the “Commission”) Notice of Comment Period issued on January 10, 2025 in the above-referenced matter.

The Joint Commenters support granting a certificate of need for the 345 kV transmission line in Southeast Minnesota from Mankato to the Mississippi River (the “Project”). As proposed, the Project will reduce congestion, enhance system reliability, aid in the transition away from emissions-intensive generation, and provide an outlet for regional transfers of clean, affordable energy. The Project meets the requirements of Minn. Stat. § 216B.243 and Minn. R. 7849.0120

and will assist utilities in complying with Minnesota’s Carbon-Free Electricity Standard.¹ Therefore, as further detailed below, the Commission should grant the request for a certificate of need in this proceeding.

BACKGROUND

Pursuant to Minn. Stat. § 216B.243, Northern States Power Company d/b/a/ Xcel Energy (“Xcel” or the “Applicant”) applied for a certificate of need on April 2, 2024 to construct the Project.² The proposal includes a high-voltage 345 kV transmission project spanning from Mankato, Minnesota to the Mississippi River and relocation of a 161 kV transmission line between North Rochester and Chester, Minnesota. The Project, located in southeast Minnesota, would serve as a nexus to connect clean energy generation in the Dakotas to the regional load center of the Twin Cities and transmission outlets to the east.³ In doing so, the Project will increase reliability, relieve transmission overloads, and reduce congestion.⁴

The Project consists of four separate segments. Segment 1 involves constructing a new 345 kV transmission line between the existing Wilmarth Substation and a point near the West Faribault Substation.⁵ Segment 2 involves constructing a new 345 kV transmission line between the terminus of Segment 1 and the existing North Rochester Substation.⁶ Segment 3 connects the existing North Rochester Substation to the Mississippi River by converting 27 miles of existing 161/345 kV transmission infrastructure into a 345/345 kV configuration and installing 16 miles of

¹ MINN. STAT. § 216B.1691, subd. 2g (requiring all electric utilities to provide 100 percent carbon-free electricity by 2040).

² Application for a Certificate of Need and Route Permit for the Mankato - Mississippi River Transmission Project 1 Apr. 2, 2024, Doc. No. 20244-204917-18 [Hereinafter “Application”].

³ See Midcontinent Indep. Sys. Operator (MISO), *MTEP21 Report Addendum: Long Range Transmission Planning Tranche 1 Portfolio Report 30* (2022) [Hereinafter “MTEP21 Portfolio Report”].

⁴ Application at 4.

⁵ *Id.* at 6.

⁶ *Id.*

new 345 kV line on existing double-circuit structures.⁷ Segment 4 relocates a portion of a 161 kV transmission line being displaced by Segment 3.⁸ Additionally, the Wilmarth, North Rochester, and Eastwood substations are expected to be upgraded as part of the Project.⁹

Prior to being proposed to the Commission, the Project was approved by the Midcontinent Independent System Operator (“MISO”) for inclusion in the Long-Range Transmission Planning (“LRTP”) Tranche 1 Portfolio.¹⁰ Tranche 1 is comprised of 18 transmission projects across the MISO Midwest region and is designed to “ensure that the regional transmission system can meet demand in all hours while supporting the resource plans and renewable energy penetration targets reflective of MISO member utilities’ goals and state policies.”¹¹ The Project represents the Minnesota portion of LRTP Project 4, which plays a pivotal role in ensuring these benefits accrue both in Minnesota and throughout the Midwest.¹² As described by MISO, LRTP 4 will help relieve constraints in the Twin Cities metro area by allowing high renewable energy flows towards and past the Twin Cities load center.¹³ The Project will also reinforce the outlet towards load centers in Wisconsin, providing congestion relief and easing thermal loading.¹⁴ Together with the broader Tranche 1 transmission buildout, the Project will help integrate and deliver renewably generated electricity, optimize regional transfer capabilities, and support adequate, reliable energy supplies in Minnesota and across the MISO region.¹⁵

⁷ Application at 1.

⁸ *Id.* at 7.

⁹ *Id.* at 15.

¹⁰ *Long Range Transmission Planning*, MISO, <https://www.misoenergy.org/planning/long-rangetransmission-planning> (last visited Mar. 5, 2025).

¹¹ MISO, *MTEP21 Report Addendum: Long Range Transmission Planning Tranche 1 Executive Summary 1* (2022) [Hereinafter “MTEP21 Executive Summary”].

¹² Application at 4

¹³ MTEP21 Portfolio Report at 30.

¹⁴ *Id.*

¹⁵ See Application at 4-5.

ANALYSIS

The Joint Commenters support the Project due to its ability to support the transition away from emission-intensive generation portfolios and reliably facilitate the transfer of clean, affordable energy from where it is produced to where it is used.¹⁶ By enabling the reach of wind and solar resources across MISO, the Project will allow the Applicant and the State of Minnesota to more effectively pursue clean energy policies that reduce ratepayer exposure to fuel cost volatility.

Minn. Stat. § 216B.243, Subd. 2 requires the Commission to issue a certificate of need before allowing a large energy facility to be sited or constructed within the state. Large energy facilities include, among other projects, any high-voltage transmission line that is (a) 300 kV or more and greater than 1 mile in length; or (b) 100 kV or more with more than ten miles of its length in Minnesota.¹⁷ The present Project comprises approximately 130 miles of new 345 kV transmission line developments and 20 miles of new 161 kV transmission lines.¹⁸ The Project therefore qualifies as a large energy facility under both these definitions. A certificate of need must be granted before the Project moves forward.

As further detailed below, the Commission should grant a certificate of need for the Project as it meets all statutory criteria and is crucial to achieving Minnesota's Carbon-Free Electricity Standard.

I. The Project Meets the Criteria for Issuing a Certificate of Need

Minnesota law defines the criteria the Commission must consider when evaluating whether to grant a certificate of need for a large energy facility.¹⁹ Minnesota's administrative rules,

¹⁶ See *id.* at 5 (summarizing the need for the Project).

¹⁷ MINN. STAT. § 216B.2421, subds. 2(2)–(3).

¹⁸ Application at 1.

¹⁹ MINN. STAT. § 216B.243, subd. 3.

underpinned by this statutory authority, require the Commission to issue a certificate of need upon making the following four determinations:

- A. The probable result of denial would be an adverse effect upon the future adequacy, reliability, or efficiency of energy supply to the applicant, to the applicant's customers, or to the people of Minnesota and neighboring states;
- B. A more reasonable and prudent alternative to the proposed facility has not been demonstrated;
- C. The proposed facility, or a suitable modification of the facility, will provide benefits to society in a manner compatible with protecting the natural and socioeconomic environments, including human health; and
- D. The record does not demonstrate that the design, construction, or operation of the proposed facility, or a suitable modification of the facility, will fail to comply with relevant policies, rules, and regulations of other state and federal agencies and local governments.²⁰

The Joint Commenters find the Project meets all four of these criteria and that the Applicant has provided sufficient justification for the Commission to issue a certificate of need.

A. Denying the Project Would Have an Adverse Effect on the Future Adequacy, Reliability, and Efficiency of Energy Supplies

In determining whether a certificate of need should be granted, the Commission must consider whether denying the Project would have an adverse effect on the adequacy, reliability, or efficiency of energy supplies to the Applicant, the Applicant's customers, or to people in Minnesota or neighboring states.²¹ The Project will play an increasingly pivotal role in providing reliable energy as existing infrastructure ages and electrification and large data center loads drive up electricity demands.²² As further detailed in Section I.C.1, the Project will mitigate current capacity issues, lower electricity losses, and drive down transmission congestion and its associated

²⁰ MINN. R. 7849.0120.

²¹ MINN. R. 7849.0120, subp. A.

²² See, e.g., Application at 5; MTEP21 Portfolio Report at 11; Thomas Spencer & Siddharth Singh, *What the Data Center and AI Boom Could Mean for the Energy Sector*, INT'L ENERGY AGENCY, (Oct. 18, 2024).

costs.²³ These improvements will help ensure electricity generated at “existing . . . and new . . . projects can be efficiently and economically delivered” to load centers in the Twin Cities and throughout the regional grid, even as the “generation mix within the MISO footprint continues to evolve to include more renewables.”²⁴

The Project is designed to alleviate renewables curtailment, overheated lines, and other thermal overloading issues that occur during summer shoulder periods when wind generation is high and demand is insufficient to consume the amount of electricity created.²⁵ As detailed in the Applicant’s reliability analysis, the Project’s added capacity will alleviate grid stress and resolve thousands of thermal overloading issues at facilities throughout southern Minnesota.²⁶

The Project will also reduce energy losses in Minnesota and throughout MISO, driving down generation costs for ratepayers.²⁷ As explained by the Applicant, energy losses must be factored in when determining how much generation is needed to serve system demand.²⁸ As energy losses decrease, so too does the amount of electricity needed to adequately serve customers, which is especially relevant during periods of demand growth.²⁹ As more load is added to the grid, reducing energy losses—and the associated generation requirements—will help offset the need for new generation facilities and improve overall system reliability.³⁰ The Project therefore bolsters the reliability of the regional grid and the adequacy of energy resources necessary to serve Minnesota’s increasingly electrified economy.

²³ Application at 45-47, 82-84.

²⁴ *Id.* at 47, 67.

²⁵ *Id.* at 69–73.

²⁶ *Id.* at 69–73.

²⁷ *Id.* at 83.

²⁸ See *id.* at 82.

²⁹ *Id.*

³⁰ *Id.* at 48–49, 82–83.

By resolving reliability issues, the Project will also mitigate congestion costs, which typically occur when “higher-cost generation resource[s] [are] dispatched in place of . . . lower-cost [resources] to avoid a reliability issue, such as overloading a transmission facility.”³¹ Currently, the MISO system lacks sufficient transmission capacity to accommodate new and existing generation facilities, which increases the prevalence of congestion and raises costs for ratepayers.³² MISO customers paid \$3.7 billion in congestion costs during 2022 alone.³³ The new transmission capacity provided by the Project and other Tranche 1 developments is therefore necessary to reduce the severity of congestion impacts and facilitate the economic deployment of energy resources.

MISO calculated that Tranche 1 offers a benefit-cost ratio of between 2.8:1 and 4:1 to MISO’s Zone 1,³⁴ which includes most of Minnesota, western Wisconsin, and the MISO portions of the Dakotas. In other words, Zone 1 ratepayers will receive between \$2.80 and \$4.00 in benefits for each \$1.00 they invest in building Tranche 1. The benefits to Zone 1 include \$3.169 billion in congestion and fuel savings, \$3.481 billion in avoided capital costs for local resource investment, \$278 million in avoided transmission, between \$248 million and \$1.629 billion in value from avoided loss of load, and between \$691 million and \$2.673 billion in decarbonization benefits, for total benefits of between \$7.867 billion and \$11.231 billion.³⁵ For comparison, MISO indicates the cost of Tranche 1 lines that would be allocated to Zone 1 ratepayers is only \$2.8 billion.³⁶

If the Commission denies the certificate of need, congestion and thermal overloading concerns will worsen as demand and clean energy penetration increase; generators will continue

³¹ *Id.* at 45.

³² *Id.* at 39, 43, 45–46.

³³ *Id.* at 46.

³⁴ *LRTP Tranche 1 Portfolio Detailed Business Case*, MISO, 56 (June 25, 2022), <https://cdn.misoenergy.org/LRTP%20Tranche%201%20Detailed%20Business%20Case625789.pdf>.

³⁵ *Id.* at 57–58.

³⁶ *Id.*

to experience significant delays in MISO's interconnection queue; and the Applicant will face increased challenges in serving demand and reliably delivering electricity from generation hubs to regional load centers. Denying the Project would therefore have an adverse effect on the future adequacy, reliability, and efficiency of energy supplies.

B. A More Reasonable and Prudent Alternative Has Not Been Demonstrated

Minn. R. 7849.0120, subpart B requires the Commission to consider whether more reasonable and prudent alternatives to the Project have been demonstrated by a preponderance of the evidence in the record. Both the Applicant and MISO analyzed potential Project alternatives to address system needs and determined the Project was more reasonable and prudent than any alternative or combination of alternatives.³⁷ The alternatives considered are detailed in Chapter 5 of the Application and include different transmission endpoints, higher or lower line voltages, double- or triple-circuiting with existing lines, direct current opportunities, undergrounding, upgrading existing infrastructure, generation and non-wires alternatives, and not constructing or delaying the Project.³⁸

Ultimately, the Joint Commenters find the Project is preferable to the alternatives considered and will produce net benefits for Minnesotans. That none of these alternatives are more reasonable or prudent than the instant Project supports the granting of a certificate of need.

C. The Project Will Benefit Natural and Socioeconomic Environments

In determining whether a proposed project provides benefits to society, the Commission must consider the following:

- (1) The relationship of the proposed facility, or a suitable modification thereof, to overall state energy needs;

³⁷ Application at 86.

³⁸ *Id.* at 86–107.

- (2) The effects of the proposed facility, or a suitable modification thereof, upon the natural and socioeconomic environments compared to the effects of not building the facility;
- (3) The effects of the proposed facility, or a suitable modification thereof, in inducing future development; and
- (4) The socially beneficial uses of the output of the proposed facility, or a suitable modification thereof, including its uses to protect or enhance environmental quality....³⁹

The Project meets these criteria and delivers substantial benefits in Minnesota and throughout MISO. The transmission capacity provided by the Project will reduce reliability risks and create new opportunities to economically deploy clean energy resources. This diversification of energy supplies reduces exposure to fuel cost volatility, lowers system emissions, and promotes economic growth in Minnesota's energy sector. For these reasons the Joint Commenters find the Project provides significant benefits to society as required by Minn. R. 7849.0120 subpart C.

1. The Project Supports Overall State Energy Needs

The Commission must consider the relationship between the Project and Minnesota's energy needs.⁴⁰ This Project will help fulfill state energy needs by reducing congestion and improving the flow of clean energy from the Dakotas to Twin Cities and other load centers in the MISO Midwest region.⁴¹

The transmission lines in Tranche 1, including this Project, are described as "no-regrets" or "least-regrets" developments because they are foundational to solving long-standing concerns regarding the reliability and efficiency of the regional grid, even under the most conservative of MISO's future forecasts.⁴² While this Project was developed as part of a broader portfolio, it was

³⁹ Minn. R. 7849.0120, subp. C.

⁴⁰ Minn. R. 7849.0120, subp. C(1).

⁴¹ MTEP21 Portfolio Report at 30.

⁴² MTEP21 Executive Summary at 1.

also individually justified by MISO and the Applicant based on regional and local needs.⁴³ MISO identified this Project as a critical component of the Tranche 1 portfolio as it was the most effective option to maintain regional reliability in southern Minnesota.⁴⁴ This corridor of the grid facilitates the transfer of wind generation out of the Dakotas and into Minnesota. However, it is heavily constrained with thermal overloads, which contribute to reliability concerns.⁴⁵ The Project is designed to alleviate this stress on the current system by providing an additional transmission outlet for renewable energy.

The Project is especially needed to relieve load concerns between the Wilmarth and North Rochester substations.⁴⁶ This portion of the Project parallels several 345 kV transmission lines that are heavily congested at times of high-generation transfers from southwestern Minnesota and northwestern Iowa. By creating additional capacity between Wilmarth and North Rochester, the Project contributes to a more reliable transmission system and enables better access to geographically diverse clean energy resources.⁴⁷

MISO calculated that Tranche 1 will increase import capacity into Zone 1 by 658 MW, from 5,412 MW to 6,070 MW.⁴⁸ MISO documents that this expansion provides reliability and resilience benefits under both normal operating conditions and under extreme weather that can cause a localized loss of thermal or renewable generation.⁴⁹ As Minnesota increases its use of wind and solar generation, it will become increasingly valuable for the state to be able to export power when renewable output is high and import power when local renewable resources are experiencing

⁴³ Application at 62.

⁴⁴ *Id.*

⁴⁵ *Id.* at 62, 70–71.

⁴⁶ *Id.* at 62–63.

⁴⁷ *Id.*

⁴⁸ *LRTP Tranche 1 Portfolio Detailed Business Case*, MISO, 29 (June 25, 2022), <https://cdn.misoenergy.org/LRTP%20Tranche%201%20Detailed%20Business%20Case625789.pdf>.

⁴⁹ *Id.* at 29, 32.

a lull in output. By resolving these transmission capacity issues, the Project will help fulfill state energy needs as generation portfolios change and energy demand increases. Ultimately, each of the system improvements provided by the Project will contribute to overarching State energy goals and help ensure Minnesotans are provided with clean, reliable energy for years to come.

2. The Project Will Produce Socioeconomic and Environmental Benefits

In making its certificate of need determination, the Commission must compare the effects of the facility on natural and socioeconomic environments with those of not building the facility.⁵⁰ Here, the Project will provide socioeconomic benefits by lowering congestion costs, mitigating price volatility, reducing carbon emissions, and creating jobs.

The Project will reduce ratepayer exposure to volatility in fuel prices by diversifying access to generation resources.⁵¹ Providing an additional outlet for generation from the Dakotas not only enhances reliability but also creates socioeconomic benefits by facilitating access to low-cost clean energy coming from the wind-rich Dakotas. Because clean energy sources do not incur the same fuel costs as fossil plants, customers will be less exposed to fuel market volatility and could experience more stable rates over time. As noted above, MISO calculated that Tranche 1 will provide Zone 1 with \$3.169 billion in congestion and fuel cost savings.

In addition to lowering fuel cost exposure for Minnesotans, the Project provides significant economic benefits by relieving congestion and contributing to emissions reductions. Relieving the congestion issues discussed in Section I.A is expected to provide up to \$3.8 billion in savings across the MISO region within 40 years of the Project's in-service date.⁵²

⁵⁰ MINN. R. 7849.0120, subp. C(2).

⁵¹ See Application at 61.

⁵² *Id.* at 73.

The carbon reductions achieved by this Project, which are discussed more thoroughly in Section I.C.4., also have both environmental and economic value. The carbon reductions expected in the first 20 years of the Project will create a cleaner, healthier environment for Minnesotans and have an economic benefit ranging from \$30.4 million to \$251.0 million across the MISO footprint, depending on the cost of carbon and resource mix tested.⁵³

The socioeconomic impacts to local communities where the Project is located are also expected to be beneficial. The Applicant estimates the Project will create 50-100 construction jobs that pay prevailing wages. As transmission construction is underway, local businesses could see revenue increases associated with sales to utility personnel and contractors. The renewable generation development in Minnesota that will be enabled by the Project, as discussed in the next section, would drive even larger increases in local economic development and job creation.

Ultimately, the Project has clear environmental and socioeconomic benefits, and Minnesota customers will be better off with the Project than without it.

3. The Project Will Induce Future Developments in Clean Energy Technologies

The Commission must consider the effects of the proposed facility in inducing future developments.⁵⁴ The Project will enable new energy projects in the region to interconnect to the grid by resolving the capacity shortfalls discussed in Section I.A, which impact the viability of new energy projects.⁵⁵ Additional transmission capacity is needed to deliver the electricity generated by these developments.⁵⁶ Without additional capacity, new generation facilities cannot interconnect to the grid, creating a build-up of completed generation projects waiting to “go

⁵³ *Id.* at 81–82.

⁵⁴ MINN. R. 7849.0120, subp. C(3).

⁵⁵ Application at 43–45.

⁵⁶ *Id.* at 39.

online.”⁵⁷ Without transmission upgrades, the cost of network upgrades needed to facilitate interconnection falls to the facility making the interconnection request, which may render them uneconomic and cause them to be withdrawn from the interconnection queue.⁵⁸

Data compiled by Lawrence Berkeley National Laboratory documents the time between initial interconnection requests and interconnection agreements for new generation projects in MISO.⁵⁹ Queue backlogs have trended upwards, with it now typically taking 3-4 years to progress from interconnection request to interconnection agreement.⁶⁰ Moreover, only about 15% of proposed generator projects that enter the MISO queue have been successfully completed.⁶¹ A significant factor driving the high rate of queue withdrawal is that interconnection costs in MISO more than tripled between 2018 to 2021.⁶² There are currently up to 198 such interconnection requests amounting to over 35,000 MW of energy that are conditioned on the Project.⁶³ MISO has calculated that Tranche 1 will increase the import limit into Zone 2 (Zone 1’s neighbor to the east, comprised of eastern Wisconsin and Michigan’s Upper Peninsula), by 1,035 MW.⁶⁴ Transmission capacity on this path, which is increased by the Project, is critical for enabling additional renewable generation development in Minnesota and western MISO as it allows that generation to be exported to the east when it exceeds demand in Minnesota. By resolving these overarching capacity issues, the Project will facilitate new clean energy generators interconnecting to the grid,

⁵⁷ *Id.* at 44.

⁵⁸ *Id.* at 44–45.

⁵⁹ John Rand, et al., *Queued Up: 2024 Edition: Characteristics of Power Plants Seeking Transmission Interconnections As of the End of 2023*, LAWRENCE BERKELEY NATIONAL LABORATORY, 35 (April 2024), https://emp.lbl.gov/sites/default/files/2024-04/Queued%20Up%202024%20Edition_1.pdf.

⁶⁰ *Id.* at 35.

⁶¹ *Id.* at 29.

⁶² Joachim Seel, et al., *Interconnection Cost Analysis in the Midcontinent Independent System Operator (MISO) Territory*, LAWRENCE BERKELEY NATIONAL LABORATORY, 1 (Oct. 2022), https://eta-publications.lbl.gov/sites/default/files/berkeley_lab_2022.10.06_-_miso_interconnection_costs.pdf.

⁶³ Application at 84.

⁶⁴ *LRTP Tranche 1 Portfolio Detailed Business Case*, MISO, 29 (June 25, 2022), <https://cdn.misoenergy.org/LRTP%20Tranche%201%20Detailed%20Business%20Case625789.pdf>.

which will be critical for meeting the State's energy policies and delivering cost-effective electricity to end-use consumers.

4. The Project Will Protect and Enhance Environmental Quality Through Emissions Reductions

Finally, the Commission must consider the proposed facility's socially beneficial uses, including its uses to protect or enhance environmental quality.⁶⁵ As discussed previously, this Project will increase Minnesota's access to renewable generation by allowing better utilization of existing resources to our west and enabling new projects to be constructed and interconnected to the grid. By increasing access to and utilization of renewable energy, the Project will lower harmful pollutants in Minnesota and the region, thereby enhancing environmental quality.

Air emissions associated with fossil fuel production and consumption include the greenhouse gas carbon dioxide as well as particulate matter, sulfur dioxide, nitrogen oxides, mercury, and other hazardous air pollutants.⁶⁶ The adverse environmental and health impacts of these hazardous pollutants will be incrementally alleviated as Minnesota transitions to clean energy resources that are not dependent on emissions-producing fuels. Between fostering new renewable energy developments and enabling fossil fuel plant retirements, the Applicant anticipates the Project will reduce emissions by 2.42 to 5.25 million metric tons over the first 20 years of operation.⁶⁷ Using the most conservative figure, this would be akin to avoiding the burning of 2.69 billion pounds of coal⁶⁸ or planting 40 million trees and letting them grow for ten years.⁶⁹

⁶⁵ MINN. R. 7849.0120, subp. C(4).

⁶⁶ *Coal Explained: Coal and the Environment*, U.S. ENERGY INFO. ADMIN., <https://www.eia.gov/energyexplained/coal/coal-and-the-environment.php> (last visited Mar. 26, 2025).

⁶⁷ Application at 80.

⁶⁸ See *Greenhouse Gas Equivalencies Calculator*, U.S. ENV'T. PROT. AGENCY, <https://www.epa.gov/energy/greenhouse-gas-equivalencies-calculator#results> (last visited Mar. 26, 2025) (using the EPA's calculator to calculate the greenhouse gas equivalency of 2.42 million metric tons of CO₂).

⁶⁹ *Id.*

These emissions reductions would occur during the time period when it is most critical to reduce emissions in order to stave off the worst impacts of climate change.⁷⁰

Modeling using the U.S. Environmental Protection Agency’s (“EPA’s”) Avoided Emissions and Generation Tool (“AVERT”) shows that the Tranche 1 lines will greatly reduce emissions of carbon dioxide and multiple other air pollutants across MISO by enabling the interconnection of 20,100 MW of new renewable generation.⁷¹ The AVERT tool was built by the EPA to quantify the impact of renewable energy and other measures on air pollution emissions,⁷² and has been widely used for emissions benefit analysis. The tool statistically estimates which power plants in a region experience reduced emissions of sulfur dioxide (SO₂), fine particulate matter under 2.5 micrometer (“PM_{2.5}”), nitrogen oxides (“NO_x”), volatile organic compounds (“VOCs”), ammonia (“NH₃”), and carbon dioxide (“CO₂”) due to the deployment of renewable energy or energy efficiency. AVERT’s “Midwest” region, which roughly approximates the footprint of MISO, was used for this analysis.

The AVERT tool indicates that delivering 20,100 MW of additional renewable generation to the Midwest region would annually displace over 37 million short tons of carbon dioxide, more than 50 million pounds of SO₂, 41 million pounds of NO_x, 4.6 million pounds of PM_{2.5}, over 1.2 million pounds of VOCs, and nearly 1.5 million pounds of NH₃.⁷³ The renewable generation

⁷⁰ See *Urgent Climate Action Can Secure a Livable Future for All*, INTERGOVERNMENTAL PANEL ON CLIMATE CHANGE, (Mar. 20, 2023), <https://www.ipcc.ch/2023/03/20/press-release-ar6-synthesis-report/> (noting that feasible and effective solutions already exist to help reduce greenhouse gas emissions and that implementing these solutions is critical to preventing the worst outcomes of climate change) (last visited Mar. 26, 2025).

⁷¹ *LRTP Tranche 1 Portfolio Detailed Business Case*, MISO, 18 (June 25, 2022), <https://cdn.misoenergy.org/LRTP%20Tranche%201%20Detailed%20Business%20Case625789.pdf>.

⁷² See *Avoided Emissions and Generation Tool (AVERT) Web Edition*, U.S. ENV’T PROT. AGENCY, <https://www.epa.gov/avert/avert-web-edition> (last visited Mar. 26, 2025).

⁷³ See Direct Test. of Michael Goggin at 48–49, In re Application of Michigan Electric Transmission Company, LLC for an Act 30 Certificate of Public Convenience and Necessity for the Construction of a Major Transmission Line Between Oneida Substation in Eaton County and Nelson Road Substation in Gratiot County, Michigan, Docket No. U-21471 (Mich. Pub. Serv. Comm’n Dec. 04, 2024).

enabled by Tranche 1 will directly benefit Minnesota residents by displacing emissions from in-state fossil generators, as well as emissions from fossil generators in other MISO states that can impair air quality and thus human health and the environment in Minnesota.

Because the Project supports the State's energy needs, reduces cost volatility, enables future clean energy interconnections, and protects environmental quality, the Commission should find that it benefits society and grant a certificate of need.

D. The Project Complies with Relevant Policies, Rules, and Regulations

In order for a certificate of need to be granted, the record must not demonstrate that the design, construction, or operation of the Project is in violation of the policies, rules, or regulations of state and federal agencies and local governments.⁷⁴ It is the Joint Commenters' understanding that the Applicant has worked diligently throughout this proceeding to collaborate with all relevant governments and agencies in the development of the Project. We are not aware of any instances of policies, rules, or regulations being violated, which supports granting a certificate of need.

II. The Project Helps Achieve Minnesota's Carbon-Free Standard

In addition to the above considerations for granting a certificate of need,⁷⁵ the Commission must also consider how the project supports Minnesota's Carbon-Free Electricity Standard.⁷⁶

In 2023, Minnesota enacted a carbon-free standard requiring the electricity delivered to Minnesota customers to be generated or procured from 100% carbon-free technologies by 2040.⁷⁷ To comply with this law, Minnesota needs to increase the share of electricity generated from

⁷⁴ MINN. R. 7849.0120, subp. D.

⁷⁵ See MINN. STAT. § 216B.243; MINN. R. 7849.0120.

⁷⁶ See MINN. STAT. § 216B.243, subd. 3(10) (in assessing need, the commission shall consider whether "the applicants are in compliance with applicable provisions of section 216B.1691"); MINN. STAT. § 216B.1691, subd. 2g (defining Minnesota carbon-free standard for electricity).

⁷⁷ See Minn. Stat. § 216B.1691, subds. 2d, 2g; see also Minn. Stat. § 216B.1645, subd. 2a.

carbon-free resources statewide, which in 2022 was only 31%.⁷⁸ Minnesota utilities will need to build a significant amount of clean energy generation with future developments in the next 16 years, with a great deal of that being built in the next *six* years.⁷⁹ This Project is a step in the right direction, providing much-needed additional transmission capacity that allows renewable energy projects to connect to the grid and deliver carbon-free electricity to Minnesota customers.

Furthermore, Minnesota's electricity consumption will likely increase as we approach 2040.⁸⁰ The needed changes in Minnesota's electricity generation portfolio will require additional transmission in the region to ensure that clean electricity can reach load centers.⁸¹ As coal and fossil fuel generation sources are retired, this Project will help deliver wind and solar energy to replace that lost generation and address the expected growth in demand.⁸²

The Joint Commenters believe this Project and other planned transmission projects are central to meeting the State's 2040 Carbon-Free Electricity Standard.

CONCLUSION

The Commission is required to issue a certificate of need for the Project upon making the four determinations detailed in Minnesota Administrative Rule 7849.0120. The Applicant has provided sufficient evidence for making all four determinations. The Project will enhance the adequacy, reliability, and efficiency of energy supplies by increasing transmission capacity and resolving thermal loading, congestion, and energy loss issues. Environmental and socioeconomic benefits will accrue by enabling clean, lower-cost clean energy to be integrated onto the grid,

⁷⁸ *Minnesota: State Profile and Energy Estimates*, U.S. ENERGY INFO. ADMIN., <https://eia.gov/state/?sid=MN#tabs-4> (last visited Mar. 25, 2025).

⁷⁹ See Application at 52 (Predicting that the energy industry will change as much in the next 5 years as it has in the last 35 years.).

⁸⁰ MTEP21 Portfolio Report at 11 (explaining how the transition towards electrification will impact electricity demand).

⁸¹ See Application at 39.

⁸² *Id.* at 60.

thereby reducing exposure to fuel cost volatility and lowering greenhouse gas emissions. Finally, the Project will be critical to meeting the statutory mandate to deliver 100% carbon-free electricity to Minnesota customers by 2040. As proposed, the Project conforms to applicable rules and regulations and meets needs that cannot be adequately addressed by alternatives. For these reasons, the Joint Commenters support the Applicant's request for a certificate of need.

Respectfully Submitted,

Dated: March 28, 2025

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/s/ Wendy Bredhold
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/s/ Brandon Crawford
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/s/ Patrick Woolsey
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Patrick.Woolsey@sierraclub.org

CERTIFICATE OF SERVICE

I, Akilah Sanders-Reed, hereby certify that I have this day served copies of the enclosed document on the attached list of persons by electronic filing.

Initial Comments of Joint Commenters on the Merits of the Certificate of Need Application

Docket No. E002/CN-22-532

Dated this 28th day of March, 2025

/s/ Akilah Sanders-Reed

Akilah Sanders-Reed
Program Associate
Minnesota Center for Environmental Advocacy
asanders-reed@mncenter.org

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
1	Michael	Ahern	ahern.michael@dorsey.com	Dorsey & Whitney, LLP		50 S 6th St Ste 1500 Minneapolis MN, 55402-1498 United States	Electronic Service		No	22-532Official CC Service List
2	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	22-532Official CC Service List
3	Jay	Anderson	jaya@cmpas.org	CMPAS		7550 Corporate Way Suite 100 Eden Prairie MN, 55344 United States	Electronic Service		No	22-532Official CC Service List
4	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	22-532Official CC Service List
5	Kristine	Anderson	kanderson@greatermngas.com	Greater Minnesota Gas, Inc.		1900 Cardinal Lane PO Box 798 Faribault MN, 55021 United States	Electronic Service		No	22-532Official CC Service List
6	Katherine	Arnold	katherine.arnold@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		No	22-532Official CC Service List
7	Jaime	Arsenault	jaime.arsenault@whiteearth-nsn.gov	White Earth		PO BOX 418 White Earth MN, 56591 United States	Electronic Service		No	22-532Official CC Service List
8	Mara	Ascheman	mara.k.ascheman@xcelenergy.com	Xcel Energy		414 Nicollet Mall Fl 5 Minneapolis MN, 55401 United States	Electronic Service		Yes	22-532Official CC Service List
9	David	Bell	david.bell@state.mn.us	Department of Health		POB 64975 St. Paul MN, 55164 United States	Electronic Service		No	22-532Official CC Service List
10	Melanie	Benjamin	melanie.benjamin@millelacsband.com			43408 Oodena Drive Onamia MN, 56359 United States	Electronic Service		No	22-532Official CC Service List
11	James J.	Bertrand	james.bertrand@stinson.com	STINSON LLP		50 S 6th St Ste 2600 Minneapolis MN, 55402 United States	Electronic Service		No	22-532Official CC Service List
12	David	Birkholz	david.birkholz@state.mn.us	MN Department of Commerce		Suite 500 85 7th Place East St. Paul MN, 55101-2198 United States	Electronic Service		No	22-532Official CC Service List
13	Michelle F.	Bissonnette	michelle.bissonnette@hdrinc.com	HDR Engineering, Inc.		Golden Hills Office Center 701 Xenia Ave S Ste 600	Electronic Service		No	22-532Official CC

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						Minneapolis MN, 55416 United States				Service List
14	Hunter	Boldt	hunterboldt@redlakenation.org	Red Lake Nation		15484 Migizi Drive Red Lake MN, 56671 United States	Electronic Service	No	22-532Official CC Service List	
15	Sheldon	Boyd	sheldon.boyd@millelacsband.com	Mille Lacs Band of Ojibwe		43408 Oodena Drive Onamia MN, 56359 United States	Electronic Service	No	22-532Official CC Service List	
16	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	22-532Official CC Service List	
17	Christina	Brusven	cbrusven@fredlaw.com	Fredrikson Byron		60 S 6th St Ste 1500 Minneapolis MN, 55402-4400 United States	Electronic Service	No	22-532Official CC Service List	
18	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	22-532Official CC Service List	
19	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	22-532Official CC Service List	
20	Robert	Budreau	robert.budreau@llojibwe.net	Leech Lake Band of Ojibwe		190 Sailstar Drive NW Cass Lake MN, 56633 United States	Electronic Service	Electronic Service	No	22-532Official CC Service List
21	James	Canaday	james.canaday@ag.state.mn.us	Office of the Attorney General - Residential Utilities Division		Suite 1400 445 Minnesota St. St. Paul MN, 55101 United States	Electronic Service	No	22-532Official CC Service List	
22	PUC	CAO	consumer.puc@state.mn.us	Public Utilities Commission		Consumer Affairs Office 121 7th Place E Suite 350 St. Paul MN, 55101 United States	Electronic Service	No	22-532Official CC Service List	
23	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	22-532Official CC Service List	
24	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	22-532Official CC Service List	
25	Cody	Chilson	cchilson@greatermngas.com	Greater Minnesota Gas, Inc. &		1900 Cardinal Ln PO Box 798	Electronic Service	No	22-532Official CC	

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
				Greater MN Transmission, LLC		Faribault MN, 55021 United States				Service List
26	Ray	Choquette	rchoquette@agp.com	Ag Processing Inc.		12700 West Dodge Road PO Box 2047 Omaha NE, 68103-2047 United States	Electronic Service	No	22-532Official CC Service List	
27	John	Coffman	john@johncoffman.net	AARP		871 Tuxedo Blvd. St, Louis MO, 63119-2044 United States	Electronic Service	No	22-532Official CC Service List	
28	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	22-532Official CC Service List	
29	Bill	Cook	bcook@rpu.org	Rochester Public Utilities		4000 East River Road NE Rochester MN, 55906 United States	Electronic Service	No	22-532Official CC Service List	
30	John	Crane	johncrane.fishing@gmail.com	Fishing		1250 Wee Gwaus DR SW Bemidji MN, 56601 United States	Electronic Service	No	22-532Official CC Service List	
31	Hillary	Creurer	hcreurer@allete.com	Minnesota Power		30 W Superior St Duluth MN, 55802 United States	Electronic Service	No	22-532Official CC Service List	
32	George	Crocker	gwillc@nawo.org	North American Water Office		5093 Keats Avenue Lake Elmo MN, 55042 United States	Electronic Service	No	22-532Official CC Service List	
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	22-532Official CC Service List	
34	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	22-532Official CC Service List	
35	Brent	Dauk	brentdauk@aol.com			140 438th Ave Moose Lake MN, 56063 United States	Electronic Service	No	22-532Official CC Service List	
36	Thomas	Davis	atdavis1972@outlook.com	-		1161 50th Ave Sherburn MN, 56171 United States	Electronic Service	No	22-532Official CC Service List	
37	Jason	Decker	jason.decker@llojibwe.net	Leech Lake Band of Ojibwe		190 Sailstar Drive NW Cass Lake MN, 56633 United States	Electronic Service	No	22-532Official CC Service List	
38	Seth	DeMerritt	seth.demerritt@centerpointenergy.com	CenterPoint Energy Minnesota Gas		505 Nicollet Mall Minneapolis MN, 55402 United States	Electronic Service	No	22-532Official CC Service List	

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
39	Bobby	Deschampe	robertdeschampe@grandportage.com	Grand Portage Band of Lake Superior Chippewa		PO Box 428 Grand Portage MN, 55605 United States	Electronic Service		No	22-532Official CC Service List
40	Randall	Doneen	randall.doneen@state.mn.us		Department of Natural Resources	500 Lafayette Rd, PO Box 25 Saint Paul MN, 55155 United States	Electronic Service		No	22-532Official CC Service List
41	John	Drawz	jdrawz@fredlaw.com		Fredrikson & Byron, P.A.	Suite 1500 60 South Sixth Street Minneapolis MN, 55402-4400 United States	Electronic Service		No	22-532Official CC Service List
42	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	22-532Official CC Service List
43	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	22-532Official CC Service List
44	Kevin	Dupuis, Sr.	kevindupuis@fdlrez.com			Reservation Business Committee 1720 Big Lake Rd Cloquet MN, 55720 United States	Electronic Service		No	22-532Official CC Service List
45	Cory	Dutcher	cory.dutcher@ge.com		GE Power and Water	1 River Rd. Bldg. 37-413 Schenectady NY, 12345 United States	Electronic Service		No	22-532Official CC Service List
46	Jamie	Edwards	jamie.edwards@millelacsband.com		Mille Lacs Band of Ojibwe	43408 Oodena Drive Onamia MN, 56358 United States	Electronic Service		No	22-532Official CC Service List
47	Kristen	Eide Tollefson	healingsystems69@gmail.com		R-CURE	28477 N Lake Ave Frontenac MN, 55026-1044 United States	Electronic Service		No	22-532Official CC Service List
48	Bret	Eknes	bret.eknes@state.mn.us		Public Utilities Commission	Suite 350 121 7th Place East St. Paul MN, 55101-2147 United States	Electronic Service		No	22-532Official CC Service List
49	Kyle	Fairbanks	kyle.fairbanks@llojibwe.net		Leech Lake Band of Ojibwe	190 Sailstar Drive NW Cass Lake MN, 56633 United States	Electronic Service		No	22-532Official CC Service List
50	Michael	Fairbanks	michael.fairbanks@whiteearth-nsn.gov		White Earth Reservation Business Committee	PO Box 418 White Earth MN, 56591 United States	Electronic Service		No	22-532Official CC Service List
51	Kate	Fairman	kate.fairman@state.mn.us		Department of Natural Resources	Box 32 500 Lafayette Rd St. Paul MN, 55155-4032 United States	Electronic Service		No	22-532Official CC Service List

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
52	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	22-532Official CC Service List
53	Eric	Fehlhaber	efehlhaber@dakotaelectric.com	Dakota Electric Association		4300 220th St W Farmington MN, 55024 United States	Electronic Service		No	22-532Official CC Service List
54	Annie	Felix Gerth	annie.felix-gerth@state.mn.us			Board of Water & Soil Resources 520 Lafayette Rd Saint Paul MN, 55155 United States	Electronic Service		No	22-532Official CC Service List
55	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	22-532Official CC Service List
56	Kade	Ferris	kade.ferris@redlakenation.org	Red Lake Region		PO Box 274 Red Lake MN, 56671 United States	Electronic Service		No	22-532Official CC Service List
57	Leonard	Fineday	leonard.fineday@llojibwe.net	Leech Lake Bank of Ojibwe		190 Sailstar Drive NW Cass Lake MN, 56633 United States	Electronic Service		No	22-532Official CC Service List
58	Terri	Finn	terri.goggleye@llojibwe.net			null null, null United States	Electronic Service		No	22-532Official CC Service List
59	Henry	Fox	henry.fox@whiteearth-nsn.gov	White Earth Nation		PO Box 418 White Earth MN, 56569 United States	Electronic Service		No	22-532Official CC Service List
60	Gary	Frazer	gfrazer@mnchippewatribe.org	Minnesota Chippewa Tribe		PO Box 217 Cass Lake MN, 56633 United States	Electronic Service		No	22-532Official CC Service List
61	Daryll	Fuentes	energy@usg.com	USG Corporation		550 W Adams St Chicago IL, 60661 United States	Electronic Service		No	22-532Official CC Service List
62	Mary Ann	Gagnon	maryannng@grandportage.com	Grand Portage Band of Ojibwe		PO Box 428 Grand Portage MN, 55605 United States	Electronic Service		No	22-532Official CC Service List
63	Karen A	Gebhardt	kageb1@gvtel.com			43901 253rd Ave Leonard MN, 56652-4026 United States	Electronic Service		No	22-532Official CC Service List
64	Shannon	Geshick	shannon.geshick@state.mn.us	Minnesota Indian Affairs Council (MIAC)		null null, null United States	Electronic Service		No	22-532Official CC Service List
65	Todd	Green	todd.a.green@state.mn.us	Minnesota Department of Labor & Industry		443 Lafayette Rd N St. Paul MN, 55155-4341 United States	Electronic Service		No	22-532Official CC Service List

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
66	Todd J.	Guerrero	todd.guerrero@kutakrock.com	Kutak Rock LLP		Suite 1750 220 South Sixth Street Minneapolis MN, 55402-1425 United States	Electronic Service		No	22-532Official CC Service List
67	Jeremy	Hamilton	jhamilton@uppersiouxcommunity-nsn.gov	Upper Sioux Community		Upper Sioux Community PO Box 147 Granite Falls MN, 56241 United States	Electronic Service		No	22-532Official CC Service List
68	Ashley	Harrison	ashley.harrison@llojibwe.net	Leech Lake Band of Ojibwe		190 Sailstar Dr NW Cass Lake MN, 56633 United States	Electronic Service		No	22-532Official CC Service List
69	Larry	Hartman	larry.hartman@state.mn.us		Department of Commerce	85 7th Place East, Suite 280 St. Paul MN, 55101 United States	Electronic Service		No	22-532Official CC Service List
70	Amy	Hastings	amyh@uppersiouxcommunity-nsn.gov	Upper Sioux Community		5722 Travers Lane PO Box 147 Granite Falls MN, 56241 United States	Electronic Service		No	22-532Official CC Service List
71	Ellen	Heine	ellen.l.heine@xcelenergy.com	Xcel Energy		414 Nicollet Mall, MP-8 Minneapolis MN, 55401 United States	Electronic Service		No	22-532Official CC Service List
72	Adam	Heinen	aheinen@dakotaelectric.com	Dakota Electric Association		4300 220th St W Farmington MN, 55024 United States	Electronic Service		No	22-532Official CC Service List
73	Abigail	Hencheck	ahencheck@mncenter.org	Minnesota Center for Environmental Advocacy		1919 University Ave W Suite 515 St. Paul MN, 55104 United States	Electronic Service		No	22-532Official CC Service List
74	Annette	Henkel	mui@mnutilityinvestors.org	Minnesota Utility Investors		413 Wacouta Street #230 St. Paul MN, 55101 United States	Electronic Service		No	22-532Official CC Service List
75	Valerie	Herring	vherring@taftlaw.com	Taft Stettinius & Hollister LLP		2200 IDS Center 80 S. Eighth Street Minneapolis MN, 55402 United States	Electronic Service		No	22-532Official CC Service List
76	Corey	Hintz	chintz@dakotaelectric.com	Dakota Electric Association		4300 220th Street Farmington MN, 55024-9583 United States	Electronic Service		No	22-532Official CC Service List
77	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	22-532Official CC Service List
78	Kari	Howe	kari.howe@state.mn.us	DEED		332 Minnesota St, #E200 1ST National Bank Bldg St. Paul MN,	Electronic Service		No	22-532Official CC Service List

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
79	Lori	Hoyum	lhoyum@mnpower.com	Minnesota Power		55101 United States				22-532Official CC Service List
80	Annie	Jackson	cheryl.jackson@whiteearth-nsn.gov	White Earth Nation		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	22-532Official CC Service List
81	Faron	Jackson, Sr.	faron.jackson@llojibwe.net			190 Sailstar Drive NW Cass Lake MN, 56633 United States	Electronic Service		No	22-532Official CC Service List
82	Travis	Jacobson	travis.jacobson@mdu.com	Great Plains Natural Gas Company		400 N 4th St Bismarck ND, 58501 United States	Electronic Service		No	22-532Official CC Service List
83	Alan	Jenkins	aj@jenkinsatlaw.com	Jenkins at Law		2950 Yellowtail Ave. Marathon FL, 33050 United States	Electronic Service		No	22-532Official CC Service List
84	Kevin	Jensvold	kevinj@uppersiouxcommunity-nsn.gov	Upper Sioux Community		PO Box 147 Granite Falls MN, 56241-0147 United States	Electronic Service		No	22-532Official CC Service List
85	Jody	Johnson	jody.johnson@piic.org	Prairie Island Indian Community		5636 Sturgeon Lake Rd Welch MN, 55089 United States	Electronic Service		No	22-532Official CC Service List
86	Johnny	Johnson	johnny.johnson@piic.org	Prairie Island Indian Community		5636 Sturgeon Lake Road Welch MN, 55089 United States	Electronic Service		No	22-532Official CC Service List
87	Richard	Johnson	rick.johnson@lawmoss.com	Moss & Barnett		150 S. 5th Street Suite 1200 Minneapolis MN, 55402 United States	Electronic Service		No	22-532Official CC Service List
88	Scott	Johnson	scott.johnson@ci.medina.mn.us	City of Medina		2052 County Road 24 Medina MN, 55340-9790 United States	Electronic Service		No	22-532Official CC Service List
89	Sarah	Johnson Phillips	sjphillips@stoel.com	Stoel Rives LLP		33 South Sixth Street Suite 4200 Minneapolis MN, 55402 United States	Electronic Service		No	22-532Official CC Service List
90	Nick	Kaneski	nick.kaneski@enbridge.com	Enbridge Energy Company, Inc.		11 East Superior St Ste 125 Duluth MN, 55802 United States	Electronic Service		No	22-532Official CC Service List
91	Tom	Karas	tomskaras@gmail.com			3171 309th Ave NW Cambridge MN, 55008 United States	Electronic Service		No	22-532Official CC Service List

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
92	Bruce	King	brenda@ranww.org	Realtors, Association of Northwestern WI		Suite 3 1903 Keith Street Eau Claire WI, 54701 United States	Electronic Service		No	22-532Official CC Service List
93	Raymond	Kirsch	raymond.kirsch@state.mn.us		Department of Commerce	85 7th Place E Ste 500 St. Paul MN, 55101 United States	Electronic Service		No	22-532Official CC Service List
94	Chad	Konickson	chad.konickson@usace.army.mil	U.S.Army Corps of Engineers		332 Minnesota St. Suite E1500 Saint Paul MN, 55101 United States	Electronic Service		No	22-532Official CC Service List
95	Stacy	Kotch Egstad	stacy.kotch@state.mn.us	MINNESOTA DEPARTMENT OF TRANSPORTATION		395 John Ireland Blvd. St. Paul MN, 55155 United States	Electronic Service		No	22-532Official CC Service List
96	Mark	Kotschevar	mkotschevar@rpu.org	Rochester Public Utilities		4000 East River Road NE Rochester MN, 55906 United States	Electronic Service		No	22-532Official CC Service List
97	Michael	Krikava	mkrikava@taftlaw.com	Taft Stettinius & Hollister LLP		2200 IDS Center 80 S 8th St Minneapolis MN, 55402 United States	Electronic Service		No	22-532Official CC Service List
98	Nicolle	Kupser	nkupser@greatermngas.com	Greater Minnesota Gas, Inc.		1900 Cardinal Ln PO Box 798 Faribault MN, 55021 United States	Electronic Service		No	22-532Official CC Service List
99	Mike	Laroque	mike.laroque@whiteearth-nsn.gov	White Earth Nation		PO Box 418 White Earth MN, 56591 United States	Electronic Service		No	22-532Official CC Service List
100	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	22-532Official CC Service List
101	James D.	Larson	james.larson@avantenergy.com	Avant Energy Services		220 S 6th St Ste 1300 Minneapolis MN, 55402 United States	Electronic Service		No	22-532Official CC Service List
102	Peder	Larson	plarson@larkinhoffman.com	Larkin Hoffman Daly & Lindgren, Ltd.		8300 Norman Center Drive Suite 1000 Bloomington MN, 55437 United States	Electronic Service		No	22-532Official CC Service List
103	Jason	Loos	jason.loos@centerpointenergy.com	CenterPoint Energy Resources Corp.		505 Nicollet Mall 3rd Floor Minneapolis MN, 55402 United States	Electronic Service		No	22-532Official CC Service List
104	Susan	Ludwig	sludwig@mnpower.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	22-532Official CC Service List
105	Vernelle	Lussier	vernelle.lussier@redlakenation.org	Red Lake Nation		15484 Migizi Drive Red Lake MN,	Electronic Service		No	22-532Official CC

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						56671 United States				Service List
106	Jamie	MacAlister	jamie.macalister@state.mn.us	Department of Commerce		85 7th Place East, Ste. 500 St. Paul MN, 55101 United States	Electronic Service		No	22-532Official CC Service List
107	Kavita	Maini	kmaini@wi.rr.com	KM Energy Consulting, LLC		961 N Lost Woods Rd Oconomowoc WI, 53066 United States	Electronic Service		No	22-532Official CC Service List
108	Dawn S	Marsh	dawn_marshall@fws.gov	U.S. Fish & Wildlife Service		Minnesota-Wisconsin Field Offices 4101 American Blvd E Bloomington MN, 55425 United States	Electronic Service		No	22-532Official CC Service List
109	Shena	Matrious	shena.matrious@millelacsband.com	Mille Lacs Band of Ojibwe		43408 Oodena Drive Onamia MN, 56349 United States	Electronic Service		No	22-532Official CC Service List
110	April	McCormick	aprlm@grandportage.com	Grand Portage Band of Lake Superior Chippewa		PO Box 428 Grand Portage MN, 55605 United States	Electronic Service		No	22-532Official CC Service List
111	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	22-532Official CC Service List
112	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	22-532Official CC Service List
113	Stacy	Miller	stacy.miller@minneapolismn.gov	City of Minneapolis		350 S. 5th Street Room M 301 Minneapolis MN, 55415 United States	Electronic Service		No	22-532Official CC Service List
114	Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP		33 South Sixth St Ste 4200 Minneapolis MN, 55402 United States	Electronic Service		No	22-532Official CC Service List
115	Travis	Morrision	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	22-532Official CC Service List
116	Robert	Moyer, Jr.	rmoyer@boisforte-nsn.gov	Bois Forte Band of Chippewa Tribal Government		5344 Lakeshore Drive Nett Lake MN, 55772 United States	Electronic Service		No	22-532Official CC Service List
117	Sonny	Myers	smyers@1854treatyauthority.org	1854 Treaty Authority		4428 Haines Rd Duluth MN,	Electronic Service		No	22-532Official CC

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						55811-1524 United States				Service List
118	Dan	Nelson	dan.nelson@isginc.com	I&S Group		115 E Hickory St Ste 300 Mankato MN, 56001 United States	Electronic Service		No	22-532Official CC Service List
119	David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency		220 South Sixth Street Suite 1300 Minneapolis MN, 55402 United States	Electronic Service		No	22-532Official CC Service List
120	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	22-532Official CC Service List
121	Ann	O'Reilly	ann.oreilly@state.mn.us	Office of Administrative Hearings		PO Box 64620 St. Paul MN, 55101 United States	Electronic Service		No	22-532Official CC Service List
122	Joseph	OBrien	joey.obrien@lowersioux.com			39527 Highway 1 Morton MN, 56270 United States	Electronic Service		No	22-532Official CC Service List
123	Samantha	Odegard	samanthao@uppersiouxcommunity-nsn.gov			PO Box 147 Granite Falls MN, 56241 United States	Electronic Service		No	22-532Official CC Service List
124	Matthew	Olsen	molsen@otpc.com	Otter Tail Power Company		215 South Cascade Street Fergus Falls MN, 56537 United States	Electronic Service		No	22-532Official CC Service List
125	Carol A.	Overland	overland@legalelectric.org	Legalelectric - Overland Law Office		1110 West Avenue Red Wing MN, 55066 United States	Electronic Service		No	22-532Official CC Service List
126	Greg	Palmer	gpalmer@greatermngas.com	Greater Minnesota Gas, Inc.		1900 Cardinal Ln PO Box 798 Faribault MN, 55021 United States	Electronic Service		No	22-532Official CC Service List
127	Cezar	Panait	cezar.panait@state.mn.us	Public Utilities Commission		121 7th Place East Suite 350 St. Paul MN, 55101 United States	Electronic Service		No	22-532Official CC Service List
128	Earl	Pendleton	earl.pendleton@lowersioux.com	Lower Sioux Indian Community		39527 Highway 1 Morton MN, 56270 United States	Electronic Service		No	22-532Official CC Service List
129	Jennifer	Peterson	jjpeterson@mnpower.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	22-532Official CC Service List
130	Kevin	Peterson	kjp@ibew160.org			1109 Northway Lane NE Rochester MN, 55906 United States	Electronic Service		No	22-532Official CC Service List

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
131	Catherine	Phillips	catherine.phillips@wecenergygroup.com	Minnesota Energy Resources		231 West Michigan St Milwaukee WI, 53203 United States	Electronic Service		No	22-532Official CC Service List
132	Angela	Piner	angela.piner@hdrinc.com	HDR, Inc.		Suite 600 701 Xenia Avenue South Suite 600 Minneapolis MN, 55416 United States	Electronic Service		No	22-532Official CC Service List
133	Joe	Plumer	joe.plumer@redlakenation.org	Red Lake Nation		15484 Migizi Drive Red Lake MN, 56671 United States	Electronic Service		No	22-532Official CC Service List
134	Benjamin L.	Porath	ben.porath@dairylandpower.com	Dairyland Power Cooperative		3200 East Ave S PO Box 817 La Crosse WI, 54602-0817 United States	Electronic Service		No	22-532Official CC Service List
135	Robert	Prescott	bob.prescott@lowersioux.com	Lower Sioux Indian Community		39527 Highway 1 Morton MN, 56270 United States	Electronic Service		No	22-532Official CC Service List
136	Larry	Rebman	larryemls@hotmail.com	EMLS, Inc		PO Box 122 Appleton MN, 56208 United States	Electronic Service		No	22-532Official CC Service List
137	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	22-532Official CC Service List
138	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	22-532Official CC Service List
139	Margaret	Rheude	margaret_rheude@fws.gov	U.S. Fish and Wildlife Service		Twin Cities Ecological Services Field Office 4101 American Blvd. E. Bloomington MN, 55425 United States	Electronic Service		No	22-532Official CC Service List
140	Susan	Romans	sromans@allete.com	Minnesota Power		30 West Superior Street Legal Dept Duluth MN, 55802 United States	Electronic Service		No	22-532Official CC Service List
141	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	22-532Official CC Service List
142	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	22-532Official CC Service List

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
143	Nathaniel	Runke	nrunke@local49.org			611 28th St. NW Rochester MN, 55901 United States	Electronic Service		No	22-532Official CC Service List
144	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	22-532Official CC Service List
145	Adam	Savariego	adams@uppersiouxcommunity-nsn.gov	Upper Sioux Community		5722 Travers Lane PO Box 147 Granite Falls MN, 56241 United States	Electronic Service		No	22-532Official CC Service List
146	Elizabeth	Schmiesing	eschmiesing@winthrop.com	Winthrop & Weinstine, P.A.		225 South Sixth Street Suite 3500 Minneapolis MN, 55402 United States	Electronic Service		No	22-532Official CC Service List
147	Peter	Scholtz	peter.scholtz@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	Suite 1400 445 Minnesota Street St. Paul MN, 55101-2131 United States	Electronic Service		No	22-532Official CC Service List
148	Christine	Schwartz	regulatory.records@xcelenergy.com	Xcel Energy		414 Nicollet Mall FL 7 Minneapolis MN, 55401-1993 United States	Electronic Service		Yes	22-532Official CC Service List
149	Jessie	Seim	jessie.seim@piic.org	Prairie Island Indian Community		5636 Sturgeon Lake Rd Welch MN, 55089 United States	Electronic Service		No	22-532Official CC Service List
150	Darrell	Seki, Sr.	dseki@redlakenation.org			15484 Migizi Drive Red Lake MN, 56671 United States	Electronic Service		No	22-532Official CC Service List
151	Will	Seuffert	will.seuffert@state.mn.us		Public Utilities Commission	121 7th Pl E Ste 350 Saint Paul MN, 55101 United States	Electronic Service		Yes	22-532Official CC Service List
152	Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates		7400 Lyndale Ave S Ste 190 Richfield MN, 55423 United States	Electronic Service		Yes	22-532Official CC Service List
153	Tom	Slukich	tom@nationalconductor.com	National Conductor Constructors		18119 Hwy 371 North Brainerd MN, 56401 United States	Electronic Service		No	22-532Official CC Service List
154	Joel	Smith	jsmith@mnchippewatribe.org	Minnesota Chippewa Tribe		PO Box 217 Cass Lake MN, 56633 United States	Electronic Service		No	22-532Official CC Service List
155	Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.		76 W Kellogg Blvd St. Paul MN, 55102 United States	Electronic Service		No	22-532Official CC Service List
156	Nizhoni	Smith	nizhoni.smith@lowersioux.com	Lower Sioux Indian Community		PO Box 308 39527 Reservation Highway 1 Morton MN,	Electronic Service		No	22-532Official CC Service List

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						56270 United States				
157	Roger	Smith, Sr.	rogermsmithsr@fdlrez.com			1720 Big Lake Road Cloquet MN, 55720 United States	Electronic Service	No	22-532Official CC Service List	
158	Adam	Sokolski	adam.sokolski@edf-re.com	EDF Renewable Energy		10 Second Street NE Ste 400 Minneapolis MN, 55410 United States	Electronic Service	No	22-532Official CC Service List	
159	Eugene	Sommers	eugene.sommers@whiteearth-nsn.gov	White Earth Nation		PO BOX 418 White Earth MN, 56591 United States	Electronic Service	No	22-532Official CC Service List	
160	Peggy	Sorum	peggy.sorum@centerpointenergy.com	CenterPoint Energy		505 Nicollet Mall Minneapolis MN, 55402 United States	Electronic Service	No	22-532Official CC Service List	
161	Marie	Spry	mariespry@grandportage.com			PO Box 428 Grand Portage MN, 55605 United States	Electronic Service	No	22-532Official CC Service List	
162	Cheyenne	St. John	cheyanne.stjohn@lowersioux.com	Lower Sioux Tribal Community		39527 Reservation Hwy 1 Morton MN, 56270 United States	Electronic Service	No	22-532Official CC Service List	
163	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	22-532Official CC Service List	
164	Byron E.	Starns	byron.starns@stinson.com	STINSON LLP		50 S 6th St Ste 2600 Minneapolis MN, 55402 United States	Electronic Service	No	22-532Official CC Service List	
165	Lauren	Steinhaeuser	lauren.steinheuser@xcelenergy.com	Northern States Power Company dba Xcel Energy		414 Nicollet Mall, 401-08 Minneapolis MN, 55401 United States	Electronic Service	No	22-532Official CC Service List	
166	Toby	Stephens	tobys@grandportage.com	Grand Portage Band of Lake Superior Chippewa		PO BOX 428 Grand Portage MN, 55605 United States	Electronic Service	No	22-532Official CC Service List	
167	Cary	Stephenson	cstephenson@otpco.com	Otter Tail Power Company		215 South Cascade Street Fergus Falls MN, 56537 United States	Electronic Service	No	22-532Official CC Service List	
168	Mark	Strohfus	mstrohfus@greenergy.com	Great River Energy		12300 Elm Creek Boulevard Maple Grove MN, 55369- 4718 United States	Electronic Service	No	22-532Official CC Service List	
169	Carl	Strohm	cjsmg@sbcglobal.net	SBC Global		105 East Edgewood Ave Indianapolis IN, 46227 United States	Electronic Service	No	22-532Official CC Service List	

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
170	James M	Strommen	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered		150 S 5th St Ste 700 Minneapolis MN, 55402 United States	Electronic Service		No	22-532Official CC Service List
171	Samuel	Strong	sam.strong@redlakenation.org	Red Lake Nation		15484 Migizi Drive Red Lake MN, 56671 United States	Electronic Service		No	22-532Official CC Service List
172	Emily	Suppes	emily.suppes@centerpointenergy.com	CenterPoint Energy Minnesota Gas		505 Nicollet Mall Minneapolis MN, 55402 United States	Electronic Service		No	22-532Official CC Service List
173	Tom	Swafford	tswafford@umsi.us	Utility Mapping Services, Inc		3947 E Calvary Rd Suite 103 Duluth MN, 55803 United States	Electronic Service		No	22-532Official CC Service List
174	Eric	Swanson	eswanson@winthrop.com	Winthrop & Weinstine		225 S 6th St Ste 3500 Capella Tower Minneapolis MN, 55402-4629 United States	Electronic Service		No	22-532Official CC Service List
175	Todd	Tadych	ttadych@atcllc.com	American Transmission Company LLC		5303 Fen Oak Dr Madison WI, 53718 United States	Electronic Service		No	22-532Official CC Service List
176	Camille	Tanhoff	kamip@uppersiouxcommunity-nsn.gov	Upper Sioux Community		5722 Travers Lane PO BOX 147 Granite Falls MN, 56241 United States	Electronic Service		No	22-532Official CC Service List
177	Stuart	Tommerdahl	stommerdahl@otpco.com	Otter Tail Power Company		215 S Cascade St PO Box 496 Fergus Falls MN, 56537 United States	Electronic Service		No	22-532Official CC Service List
178	Jayme	Trusty	execdir@swrdc.org	SWRDC		2401 Broadway Ave #1 Slayton MN, 56172 United States	Electronic Service		No	22-532Official CC Service List
179	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	22-532Official CC Service List
180	Jen	Tyler	tyler.jennifer@epa.gov	US Environmental Protection Agency		Environmental Planning & Evaluation Unit 77 W Jackson Blvd. Mailstop B-19J Chicago IL, 60604-3590 United States	Electronic Service		No	22-532Official CC Service List
181	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	22-532Official CC Service List

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
182	Leonard	Wabasha	leonard.wabasha@shakopeedakota.org	Shakopee Mdewakanton Sioux Community		2300 Tiwahe Circle Shakopee MN, 55379 United States	Electronic Service		No	22-532Official CC Service List
183	Caren	Warner	caren.warner@state.mn.us		Department of Commerce	85 7th Place East Suite 280 St. Paul MN, 55101-2198 United States	Electronic Service		No	22-532Official CC Service List
184	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	22-532Official CC Service List
185	Elizabeth	Wefel	eawefel@flaherty-hood.com	Missouri River Energy Services		525 Park St Ste 470 Saint Paul MN, 55103 United States	Electronic Service		No	22-532Official CC Service List
186	Heather	Westra	heather.westra@piic.org	Prairie Island Indian Community		5636 Sturgeon Lake Rd Welch MN, 55089 United States	Electronic Service		No	22-532Official CC Service List
187	Alan	Whipple	sa.property@state.mn.us		Minnesota Department Of Revenue	Property Tax Division 600 N. Robert Street St. Paul MN, 55146-3340 United States	Electronic Service		No	22-532Official CC Service List
188	Deanna	White	mncwa@cleanwater.org	Clean Water Action & Water Fund of MN		330 S 2nd Ave Ste 420 Minneapolis MN, 55401 United States	Electronic Service		No	22-532Official CC Service List
189	Noah	White	noah.white@piic.org	Prairie Island Indian Community		5636 Sturgeon Lake Road Welch MN, 55089 United States	Electronic Service		No	22-532Official CC Service List
190	Steve	White	steve.white@llojibwe.net	Leech Lake Band of Ojibwe		190 Sailstar Drive NW Cass Lake MN, 56633 United States	Electronic Service		No	22-532Official CC Service List
191	Cody	Whitebear	cody.whitebear@piic.org	Prairie Island Indian Community		5636 Sturgeon Lake Road Welch MN, 55089 United States	Electronic Service		No	22-532Official CC Service List
192	Mike	Wilson	mike.wilson@millelacsband.com	Mille Lacs Band of Ojibwe		43408 Oodena Dr Onamia MN, 56359 United States	Electronic Service		No	22-532Official CC Service List
193	Virgil	Wind	virgil.wind@millelacsband.com	Mille Lacs Band of Ojibwe		43408 Oodena Drive Onamia MN, 56359 United States	Electronic Service		No	22-532Official CC Service List
194	Joseph	Windler	jwindler@winthrop.com	Winthrop & Weinstine		225 South Sixth Street, Suite 3500 Minneapolis MN, 55402 United States	Electronic Service		No	22-532Official CC Service List
195	Jonathan	Wolfgram	jonathan.wolfgram@state.mn.us	Office of Pipeline Safety		445 Minnesota St Ste 147 Woodbury	Electronic Service		No	22-532Official CC Service List

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						MN, 55125 United States				
196	Laurie	York	laurie.york@whiteearth-nsn.gov	White Earth Reservation Business Committee		PO Box 418 White Earth MN, 56591 United States	Electronic Service		No	22-532Official CC Service List
197	Ian	Young	ianyoung@fdlband.org	Fond du Lac Band of Lake Superior Chippewa		1720 Big Lake Road Cloquet MN, 55720 United States	Electronic Service		No	22-532Official CC Service List
198	Kurt	Zimmerman	kwz@ibew160.org	Local Union #160, IBEW		2909 Anthony Ln St Anthony Village MN, 55418-3238 United States	Electronic Service		No	22-532Official CC Service List
199	Patrick	Zomer	pat.zomer@lawmoss.com	Moss & Barnett PA		150 S 5th St #1200 Minneapolis MN, 55402 United States	Electronic Service		No	22-532Official CC Service List