

November 29, 2022

Via eDockets

Consumer Affairs Office
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101

RE: EERA Hearing Comments
Byron Solar Project
PUC Docket No. IP7041/GS-20-763, CN-20-764, TL-20-765
OAHS Docket No. 5-2500-38038

Dear Consumer Affairs Office:

Minnesota Department of Commerce, Energy Environmental Review and Analysis (EERA) offers the following comments regarding the draft decommissioning plan clarification on the extent of site control, and proposed permit conditions for the Byron Solar Project (Project) proposed by Byron Solar, LLC (Byron Solar). In these comments EERA recommends modifications to the draft decommissioning plan, summarizes the changes between the sample permits and the draft site and route permits included in the Environmental Assessment (EA) prepared for the Project, and recommends special site permit conditions.

Decommissioning Plan

Site permits for wind and solar facilities issued by the Minnesota Public Utilities Commission (Commission) require permittees to file decommissioning plans prior to commercial operation. The intent of the decommissioning plan is to ensure that the site is restored at the end of the energy facility's useful life, and that the restoration costs are borne by the permittee.

EERA staff has reviewed the draft decommissioning plan filed by Byron Solar in its August 2021 *Joint Site Permit and Route Permit Application*.¹ EERA staff's review is guided by the recommendations of the Solar and Wind Decommissioning Working Group and additional comments and recommendations found in the Commission's docket on the decommissioning of solar and wind facilities (PUC Docket 17-123).

The August 2021 draft decommissioning plan meets EERA's expectations in the following areas at this time:

- independent preparation.
- information on the objective of the decommissioning plan.
- permits and notifications: This brief description meets EERA's expectation at this time. The requirement for updates every five years allows for the list of permits and notifications to become more specific as the project moves towards the end of its life.

¹ Byron Solar, *Joint Site And Route Permit Application*, at Appendix H: Decommissioning Plan, eDocket ID: [20218-177527-02](#)

- cost and assumptions.

EERA recommends that Byron Solar incorporate the following revisions to the August 2021 draft decommissioning plan prior to construction:

- **Project description:** EERA recommends the description be updated prior to construction to include:
 - A site map showing the final location of project components (e.g. solar arrays, roads, perimeter fencing, stormwater ponds, collector lines, substation, O&M facility).
 - Updated information on the number and model of PV panels, area of solar arrays, miles of road, miles of underground and overhead collector lines, number of stormwater basins, etc.
 - Anticipated date of commercial operation (to be updated in future filings to reflect the actual commercial operation date)
 - Date and eDocket location of the site permit when issued. Future updates should also include a link to past decommissioning plans
- **Use of Generation Output:** The pre-construction submittal of the decommissioning plan should be updated to include information on the use of the generation output. If the output is sold through a power purchase agreement (PPA), the decommissioning plan should include the expiration date of the PPA.
- **Scheduled Updates:** EERA recommends the revised plan clarify the schedule for updates to the decommissioning plan under a separate heading once the estimated commercial operation date is known. The decommissioning plan should provide a schedule for updates at five-year intervals following the commercial operation of the Project and at ownership changes. Section 1.5 of the draft decommissioning plan (“Financial Assurance Plan”) indicates the decommissioning plan will be updated every five years from the start of operation. Section 1.6 of the draft plan (“Estimated Decommissioning Costs”) includes Byron Solar’s intent to update costs, periodically “the estimate of net costs should be updated every 5 years and when ownership changes to recognize price trends for both decommissioning costs and the salvage and resale values of the components. “, and later in that section “every five years after the tenth year of Operation”
- **Tasks and Timing:** EERA recommends the pre-construction version of the decommissioning plan be revised to include:
 - The date of the plan and Commission’s docket number for the project on the cover of the decommissioning plan.
 - The date and eDocket location of the site permit when issued. Future updates should also reference past decommissioning plans and provide a link to those plans.
 - Include a discussion of the decommissioning and disposition of stormwater basins. Although the plan references approximately 17 acres of stormwater basins, and preliminary site layout shows 38 stormwater basins, the plan does not discuss what will happen to the basins upon project decommissioning.

- **Financial Assurance:** EERA recommends substantial changes to this section to clarify the funding of the financial assurance and the beneficiary of the financial assurance.

The decommissioning plan states that Byron Solar will enter into some type of financial surety by year 10 of operation. EERA recommends that Byron Solar identify an intended beneficiary of the financial surety. Consistent with the Working Group's recommendations, EERA recommends that the beneficiary of the financial surety be a governmental unit rather than individual landowners. EERA also notes that Dodge County will not accept letters of credit as a financial surety.

EERA notes that the financial surety anticipated by Byron Solar will cover the net cost (total costs less resale and salvage value of the components). The cost estimate shows a surplus - the salvage value is greater than the cost of decommissioning. Because the net cost shows a surplus it is unclear to EERA how a financial surety would work in the event of a default on the part of Byron Solar. It appears that the beneficiary may not have access to funds prior to arranging for and paying for the decommissioning work and then perhaps be reimbursed for the scrap value of the project components.

Byron Solar's decommissioning plan anticipates leaving in place project-related infrastructure that is buried at a greater depth than 48 inches. Dodge County notes that that assumption is inconsistent with the Dodge County performance standards, which require removal of all underground equipment.

Although site permits for Large Wind Energy Conversion Systems require removal of project components to a depth of four feet (48 inches), the final site restoration requirements for a solar site (Section 9.2 of the site permit) does not specify a depth of removal. Byron Solar notes in its pre-filed testimony that leaving project components in place is consistent with decommissioning plans provided for both wind and solar generating facilities and reviewed by EERA. Byron Solar further argues that leaving project-related infrastructure in place limits vegetation, soil, and surface disturbance

EERA notes that Minnesota has developed a better understanding over the past five years about the disturbance of large areas during construction of utility-scale solar generating facilities. The experience with the construction process leads EERA to recommend a number of standard permit conditions to minimize impacts to soil health, erosion control, stormwater runoff, and to ensure that the sites are adequately vegetated after construction and throughout operation. Unfortunately, there is not similar experience with decommissioning of large solar generating facilities in Minnesota or elsewhere. EERA believes it is possible that uncovering and extracting all underground project components may result in significant disturbance of solar sites. EERA believes that the five-year updates of the decommissioning plan will allow for flexibility as the knowledge about decommissioning of utility-scale solar grows.

Site Permit Modifications

Commission staff filed a sample site permit on October 21, 2021.² EERA prepared a proposed Draft Site Permit (DSP) and included it as Appendix C of the Environmental Assessment (EA). EERA's proposed DSP attached to the EA makes several modifications to the sample site permit.³ In these comments, EERA discusses the changes between the sample site permit and draft site permit. EERA also proposes an

² Commission. *Briefing Papers, October 28, 2021, Agenda, Revised*. October 21, 2021, at attachment C, eDocket ID: [202110-179018-03](#)

³ Minnesota Department of Commerce,, *Combined Environmental Assessment and Environmental Report for Byron Solar Project* , Appendix C: Draft Site Permit, September 22, 2022, eDocket ID: [20229-189238-10](#)

additional special condition requiring Byron Solar to develop and provide a Visual Screening Plan to nearby residents and Dodge County. All of these changes are shown in the markup version of EERA’s proposed Draft Site Permit shown in Attachment A to this document and are summarized in Table 1.

Generally, the modifications proposed by EERA fall into the following categories:

- **Technical Changes:** Most of the modifications are minor, technical changes necessary to
 - Tailor the permit to this specific project (e.g. permittee name, project location, equipment details)
 - Address typographical errors (e.g. correcting reference to “route” with “site”) or technical inconsistencies (eg. capitalization of terms, consistent use of terms)
 - Facilitate consistency and clarity around compliance (eg. consistently requiring pre-construction compliance filings “14 days prior to the pre-construction meeting,” clarifying record-keeping requirements, clarity and consistency in how certain compliance filings are named/referenced throughout the permit).
- **Updates to Standard Conditions:** Some of the modifications update the permit to reflect the evolution of permit conditions that have routinely been adopted in recent dockets. In some cases, the modifications reflect the most updated version of standard permit condition language as it appears in other recent dockets. In other cases, the modifications update the permit to reflect the “standardization” of conditions that have now been adopted as “special” several times over in recent dockets and have come to be a standard expectation of permittees.
- **Special Conditions:** Based on recommendations from the Minnesota Department of Natural Resources (DNR) as well as EERA’s experience with solar energy generating facilities from prior proceedings, EERA proposes five special conditions. Special conditions related to karst geology in the project area, wildlife-friendly erosion control measures, and protection measures for the Northern Long-Eared Bat and the Loggerhead Shrike were proposed in the EA. In this filing, EERA also proposes that Byron Solar prepare a Visual Screening Plan to mitigate visual impacts from the project to nearby residences.
- **Applicant-Suggested Modifications:** In its pre-filed testimony, Byron Solar proposed modifications to certain permit conditions. EERA responds to Byron Solar’s proposed modifications in this filing.

Each of these categories are discussed in further detail below.

Table 1. EERA Proposed Site Permit Modifications

Section Title	Permit Section Number		Proposed Modification
	Sample Permit	EERA Proposed	
Cover Page	n/a	n/a	updates with Project-specific information update Executive Secretary name and add 800 number to the request for document alternative format
Site Permit	1	1	updates with Project-specific information
Project Description	2	2	updates with Project-specific information

Section Title	Permit Section Number		Proposed Modification
	Sample Permit	EERA Proposed	
Associated Facilities	2.1	2.0	edit to move to Section 2, Project description
Project Location	2.2	2.1	edit for consistency and Project-specific information
Project Ownership	n/a	2.2	new Project Ownership section to require a submittal of ownership structure 14 days prior to the pre-construction meeting and when ownership structure changes
Designated Site	3	3	edit for consistency edits to clarify Permittee responsibility
General Conditions	4	4	edits for consistency
Permit Distribution	4.1	4.1	edits to for clarity and consistency adds affidavit submittal to clarify compliance requirement
Access to Property	4.2	4.2	edits to clarify when Permittee must contact landowner add recordkeeping requirement to clarify compliance requirement
Construction and Operation Practices	4.3	4.3	edits to remove reference to the site permit as projects are often modified over the course of review
Field Representative	4.3.1	4.3.1	edit for clarity and consistency add affidavit submittal to clarify compliance requirement
Site Manager	4.3.2	4.3.2	edits for clarity and consistency add affidavit submittal to clarify compliance requirement
Employee Training and Education of Permit Terms and Conditions	4.3.3	4.3.3	edits for clarity add recordkeeping requirement to clarify compliance requirement
Independent Third-Party Monitor		4.3.4	moved from Special Conditions to standard permit condition for solar site permits
Public Services and Public Utilities	4.3.4	4.3.5	edits for clarity add recordkeeping requirement to clarify compliance requirement
Temporary Workspace	4.3.5	4.3.6	edit to correct a typo edits to clarify Permittee responsibility
Noise	4.3.6	4.3.7	correct typo in rule citation edit for clarity and consistency
Aesthetics	4.3.7	4.3.8	edits to clarify Permittee responsibility

Section Title	Permit Section Number		Proposed Modification
	Sample Permit	EERA Proposed	
			edit for consistency
Topsoil Protection	4.3.8	4.3.9	edit to eliminate unnecessary language; topsoil protection is a standard permit condition that landowners may not opt out of
Soil Compaction	4.3.9	4.3.10	edits for consistency with other Commission-issued permits
Soil Erosion and Sediment Control	4.3.10	4.3.11	edits for clarity and consistency edits to clarity of Permittee responsibility
Public Lands	4.3.11	4.3.12	edits for consistency edits to clarity of Permittee responsibility
Wetlands and Water Resources	4.3.12	4.3.13	edits to clarify Permittee responsibility edits for consistency
Native Prairie	4.3.13	4.3.14	edits to clarify Permittee responsibility
Vegetation Removal	4.3.14	4.3.15	edits for clarity and consistency
Beneficial Habitat	4.3.15	4.3.16	remove vegetative management plan (VMP) language to a separate condition edits for clarity edits to clarify Permittee responsibility
Vegetation Management Plan	5.2	4.3.17	move from Special Conditions; VMPs are standard conditions for solar site permits
Agricultural Impact Mitigation Plan	n/a	4.3.18	adds a standard condition for solar site permits
Application of Pesticides	4.3.16	4.3.19	edits for clarity and consistency adds recordkeeping requirement to clarify compliance requirement
Invasive Species	4.3.17	4.3.20	edits for clarity edit 30 days to at least 14 days prior to pre-construction meeting for consistency
Noxious Weeds	4.3.18)	4.3.21	adds recordkeeping requirement to clarify compliance requirement
Roads	4.3.19	4.3.22	edit for clarity and consistency edits to clarify Permittee responsibility adds recordkeeping requirement to clarify compliance requirement
Archaeological and Historic Resources	4.3.20	4.3.23	edit for consistency edits to clarify Permittee responsibility adds recordkeeping requirement to clarify compliance requirement
Interference	4.3.21	4.3.24	edits for consistency adds recordkeeping requirement to clarify compliance requirement

Section Title		Permit Section Number		Proposed Modification
		Sample Permit	EERA Proposed	
Restoration		4.3.22	4.3.25	edits for consistency
Cleanup		4.3.23	4.3.26	edits to clarify Permittee responsibility
Pollution and Hazardous Wastes		4.3.24	4.3.27	edits for consistency
Damages		4.3.25	4.3.28	adds recordkeeping requirement to clarify compliance requirement
Public Safety		4.3.26	4.3.29	edits for clarity and consistency adds recordkeeping requirement to clarify compliance requirement
Site Identification		4.3.27	4.3.27	edits to clarify Permittee responsibility
Security Fencing		5.3	4.3.31	moved from a special condition to a standard condition for solar site permits
Feeder Lines		4.4	4.4	edits to clarify Permittee responsibility
Safety Codes and Design Requirements		4.5.1	4.5	edits to clarify Permittee responsibility edit to clarify that staff can request records
Other Permits and Regulations		4.5.2	4.6	edits for clarity and consistency
Special Conditions	Landscaping Plan	5.1	5.5	edits to incorporate a Visual Screening Plan into the VMP required under Section 4.3.17.
	Vegetation Management Plan	5.2	4.3.17	moved to a standard condition.
	Security Fencing	5.3	4.3.31	moved to a standard condition
	Tree Removal Timetable	5.4	5.3	edits to reference United States Fish and Wildlife guidance on Northern Long Eared Bat Protection. This guidance includes, but is not limited to, tree-clearing timing.
	Karst Geology	n/a	5.1	adds as a special condition in response to karst conditions at project site.
	Wildlife-Friendly Erosion Control	n/a	5.2	adds as a special condition at the recommendation of DNR
	Northern Long-Eared Bat	5.4	5.3	adds as a special condition, replaces earlier language
	Loggerhead Shrike	n/a	5.4	adds as a special condition at DNR recommendation
	Visual Screening Plan	n/a	5.5	adds a new special condition proposed in EERA Hearing Comments requiring a visual screening plan be incorporated into the VMP required under Section 4.3.17 of the permit; the special condition.
Delay in Construction		6	6	edits for clarity
Pre-Construction Meeting		8.1	8.1	edit for clarity

Section Title	Permit Section Number		Proposed Modification
	Sample Permit	EERA Proposed	
Pre-Operation Meeting	8.2	8.2	edits for clarity and consistency
Site Plan	8.3	8.3	edit for consistency edit to require notification from Commission before Permittee may construct
Status Reports	8.4	8.4	edit to clarify compliance requirements
Labor Statistic Reporting	8.5	8.5	edits for consistency
In-Service Date	8.6	8.6	edits for consistency
As-Builts	8.7	8.7	edits for consistency
GPS Data	8.8	8.8	edit to include associated facilities
Project Energy Production	8.9	8.9	edits for consistency
Emergency Response	8.10	8.10	edits for consistency add affidavit submittal to clarify compliance requirement
Decommissioning Plan	9.1	9.1	edits to clarify condition requirements and include Project-specific information edits to require submittal prior to pre-construction meeting instead of pre-operation meeting edits for consistency
Site Final Restoration	9.2	9.2	edit to add "Final" to distinguish it from section 4.3.22 Restoration edits for consistency edit to required landowner agreements prior to commencing restoration activities add notification of final restoration completion to clarify compliance requirement
Abandoned Equipment	9.3	9.3	edits section title to use "Equipment" instead of "Solar Installations" for inclusion of other equipment, such as associated facilities
Final Project Boundary	10.1	10.1	edits for consistency
Expansion of Project Boundary	10.2	10.2	edits for consistency
Modification of Conditions	10.4	10.4	edits for consistency
Right of Entry	10.6	10.6	edits for consistency
Permit Transfer	12	12	change text to a list format add transferee submittal requirements and certification of ability to comply with permit

Technical Changes

Most of these changes are minor technical changes that update the permit with the specifics of this Project (e.g. permittee name, Project location, equipment details), correct minor errors in the sample permit language (e.g. replace “route” with “site”), or provide better consistency across the permit (eg. capitalization of terms, consistent use of terms).

In addition, EERA recommends a number of changes to facilitate consistency and clarity around compliance. As part of the technical expertise the Department provides to the Commission under Minnesota Statute 216E.03, subpart 11, EERA reviews compliance filings required by site and route permits issued by the Commission and assesses consistency of these filings with permits requirements. In order to facilitate its ability to fulfill this responsibility, EERA works to ensure that permit conditions are written in a manner that makes compliance requirement clear, direct, and consistent.

The proposed modifications are not meant to alter the substance of permit conditions but rather to provide clarity for the Permittee, Commission, EERA, and the public in assuring compliance. In general, EERA’s proposed modifications include the following.

- **Active voice:** Using active voice makes it abundantly clear who is responsible for taking actions required by the permit. For example, changing “personal litter.... shall be removed...” to “The Permittee shall remove personal litter...” removes any potential confusion about who is responsible for litter removal.
- **Compliance verification:** In certain cases, requiring standard filings that “close the loop” on completion of mailings, postings, or notifications make it simpler to verify compliance. EERA recommends a number of changes, clarifying that the Permittee must document their action by filing an affidavit so the action may more easily be verified.
- **Record-keeping:** In certain cases, clarifying record-keeping requirements can ensure that if questions were to arise regarding compliance, they could be easily addressed. To this end, EERA recommends a number of changes clarifying expectations around records the Permittee should keep and make available upon the request of Commission or Commerce staff. EERA believes this will aid in resolving potential compliance disputes. In addition, EERA recommends a number of changes clarifying that staff from the Commission or Commerce can ask for records or information to assist with evaluating compliance or reviewing complaints. This clarifies the obligation to coordinate with staff.
- **Compliance tracking:** EERA has proposed a compliance filing tracking table in a new format to be included as an appendix to the permit. The compliance filings table lists required filings in chronological order. The table acts as a checklist summary of the requirements in the permit so that the Permittee and Commerce staff may quickly see what and when filings are required.

Updates To Standard Permit Conditions

EERA proposed several modifications to the sample site permit to add what were formerly special permit conditions to the standard conditions in the body of the permit. EERA also proposes adding one new standard condition to clarify project ownership what have become standard permit conditions.

Project Ownership

EERA recommends adding section 2.2 to the permit, dealing with Project ownership to supplement Section 12 (Permit Transfer). It is critical that the entity providing oversight of the implementation of

plans and procedures detailed in the permit understand the requirements and that EERA and Commission staff have a clear pathway to identify and communicate with that entity. Section 12 addresses this need in the case where the specific permittee (LLC named in the permit) changes.

It is not uncommon, however, for the ownership of an independently owned projects to change after permits and approvals have been acquired. Most typically the actual permittee (LLC identified in the site permit) remains the same, but the ownership of the LLC changes, either through acquisition or a change in the partnership owning the LLC. Because of this feature of the independent power producer model, additional permit language is needed to address the need more traditionally served by Section 12 of the permit.

The new proposed section is intended to establish a solid base of understanding of the project's ownership structure prior to construction and to ensure that the Project's owner is aware of all the plans, procedures and conditions of the permit and is willing and able to meet the conditions of the permit.

2.2 Project Ownership

The Permittee shall identify the Project's ownership structure including any parent entity, majority or controlling interest to the Commission at least 14 days prior to the pre-construction meeting.

In the event of an ownership change, such as the sale of a parent entity, majority or controlling interest, the Permittee shall identify the new Project's ownership structure, provide the name and contact information for the site manager, as described in Section 4.3.2, and either a current version with e-docket reference, or a revised version of the following to the Commission:

- (a) vegetation management plan, as described in Section 4.3.17;
- (b) complaint procedures, as described in Section 7 and Attachment 1;
- (c) emergency response plan, as described in Section 8.10; and
- (d) decommissioning plan, as described in Section 9.

Also, in the event of an ownership change, the Permittee must provide the Commission with a certification that it has read, understands and is able to comply with the plans and procedures it filed and all conditions of this permit.

Construction and Operation Practices

EERA proposes removing the reference to the site permit application. It is common for a project or for aspects of the Project, impacts, or mitigation measures to change significantly between the initial application and the final permit decision.

4.3 Construction and Operation Practices

The Permittee shall comply with the construction practices, operation and maintenance practices, and material specifications described in the ~~[Site Permit Application date and title], and the record of the proceedings unless this permit establishes a different requirement in which case this permit shall prevail~~

Independent Third-Party Monitor

EERA proposes moving the requirement for an Independent Third-Party Monitor from a Special Condition to a standard condition. Because of the large amount of land disturbance for a utility-scale solar generating facility, third-party monitors have been required of many solar site permits⁴ issued by the Commission to ensure compliance with permit conditions.

4.3.4 Independent Third-Party Monitor

Prior to any construction, the Permittees shall propose a scope of work and identify one independent third party monitor on behalf of the Department of Commerce. The scope of work shall be developed in consultation with and approved by the Department of Commerce. This third-party monitor will report directly to and will be under the control of the Department of Commerce with costs borne by the Permittee. The Permittee shall file the scope of work, and the name, address, email, phone number, and emergency phone number of the third-party monitor with the Commission at least 14 days prior to the pre-construction meeting, and upon changes to the scope of work or third-party monitor contact information.

Topsoil Protection

EERA proposes removing language allowing landowners to opt out of topsoil protection, including soil segregation during construction. Topsoil protection is a standard permit condition and not optional.

4.3.7 Topsoil Protection

The Permittee shall implement measures to protect and segregate topsoil from subsoil on all lands ~~unless otherwise negotiated with affected landowners.~~

Beneficial Habitat

EERA proposes modifications to this section of the permit to clarify the objective of using beneficial habitat and encourages the Permittee to meet the standards for Minnesota's Habitat Friendly Solar Program while moving the VMP language into its own section.

4.3.16 Beneficial Habitat

The Permittee shall implement site restoration and management practices that provide for native perennial vegetation and foraging habitat beneficial to gamebirds, songbirds, and pollinators; and that ~~enhances soil water retention and reduces storm water runoff and erosion.~~ The Permittee shall develop a vegetation management plan that incorporates, to the extent applicable and appropriate, the technical guidance and best management practices outlined in the DNR's Prairie Establishment and Maintenance Technical Guidance for Solar Projects⁴. ~~The vegetation management plan shall be filed at least 30 days prior to the pre-construction meeting.~~ improve soil water retention and reduce storm water runoff and erosion. To ensure continued management and recognition of beneficial habitat, the Permittee is encouraged to seek certification or meet the standards for Minnesota's Habitat Friendly Solar Program by submitting project by following guidance set forth by plans, seed mixes, a completed project planning assessment form, and any other applicable documentation used to meet the Pollinator

⁴ Permit conditions requiring third-party monitors were included in the site permits for Aurora Solar (14-515), Marshall Solar (14-1052), Louise Solar (20-647), and the draft permit provided to the Commission for Hayward Solar (21-113).

~~*Plan provided by standard to the Board of Water and Soil Resources. All(BWSR). The Permittee shall file documents required by Board of Water and Soil Resources for to be filed with BWSR for meeting and maintaining Habitat Friendly Solar Certification and maintenance of that certification should also be filed with the Commission.*~~

Vegetation Management Plan

EERA proposes moving the requirement for a Vegetation Management Plan (VMP) from a Special Condition to a standard condition. Because of the large amount of land disturbance for a utility-scale solar generating facility, VMPs have been required of all solar site permits issued by the Commission and Byron Solar has included a draft VMP as Appendix E of its joint application.

4.3.17 Vegetation Management Plan

The Permittee shall develop a vegetation management plan (VMP), in coordination with the Department of Commerce, DNR, BWSR, MPCA, and Agriculture, using best management practices established by the DNR and BWSR. The Permittee shall file the VMP and documentation of the coordination efforts between the Permittee and the coordinating agencies with the Commission at least 14 days prior to the pre-construction meeting. The Permittee shall provide all landowners within the Project Boundary with copies of the VMP. The Permittee shall file with the Commission an affidavit of its distribution of the VMP to landowners at least 14 days prior to the pre-construction meeting.

The VMP must include the following:

- (a) management objectives addressing short term (year 0-5, seeding and establishment) and long term (year 5 through the life of the Project) goals;
- (b) a description of planned restoration and vegetation management activities, including how the site will be prepared, timing of activities, how seeding will occur (broadcast, drilling, etc.), and the types of seed mixes to be used;
- (c) a description of how the site will be monitored and evaluated to meet management goals;
- (d) a description of the management tools used to maintain vegetation (e.g., mowing, spot spraying, hand removal, fire, grazing, etc.), including the timing and frequency of maintenance activities;
- (e) identification of the third-party (e.g., consultant, contractor, site manager, etc.) contracted for restoration, monitoring, and long-term vegetation management of the site;
- (f) identification of on-site noxious weeds and invasive species (native and non-native) and the monitoring and management practices to be utilized; and
- (g) a marked-up copy of the site plan showing how the site will be revegetated and that identifies the corresponding seed mixes.

Best management practices should be followed concerning seed mixes, seeding rates, and cover crops.

Agricultural Impact Mitigation Plan

EERA has added an Agricultural Impact Mitigation Plan (AIMP) as a standard condition. Although this condition was not included in the Sample Permit, AIMP's have been required for most solar site permits

located on agricultural land.⁵ Byron Solar has included a draft AIMP as Appendix D of its joint application.

4.3.18 Agricultural Impact Mitigation Plan

The Permittee shall develop an agricultural impact mitigation plan (AIMP) in coordination with the Minnesota Department of Agriculture (MDA). The Permittee shall provide landowners within the Project Boundary with a copy of the AIMP. The Permittee shall file with the Commission the AIMP and an affidavit of the AIMP distribution to landowners at least 14 days prior to the pre-construction meeting.

Security Fencing

EERA has moved Security Fencing from a special condition in the Sample Permit to a standard condition in the DSP. Security Fencing has become a standard condition in solar site permits. Proposed modifications are discussed in response to Byron Solar’s proposal under Applicant-Proposed Modification .

Decommissioning Plan

EERA proposes modifying Section 9.1 of the DSP to include project-specific information on the decommissioning plan, require submittal prior to pre-construction meeting instead of pre-operation meeting, and clarify updates to the decommissioning plan.

9.1 Decommissioning Plan

The Permittee shall ~~submit~~ comply with the provisions of the most recently filed and accepted decommissioning plan. The initial version of the decommissioning plan was submitted for this Project as Appendix H of the August 30, 2021, Site Permit Application. The Permittee shall file an updated decommissioning plan incorporating comments and information from the permit application process and any updates associated with the final construction plans, with the Commission at least fourteen 14 days prior to the ~~pre-operation~~ construction meeting. The Permittee shall update and ~~provide updates~~ file the decommissioning plan with the Commission every five years ~~thereafter~~ following the commercial operation date.

The decommissioning plan shall provide information identifying all surety and financial securities established for decommissioning and site restoration. The decommissioning plan shall provide an itemized breakdown of costs of decommissioning all ~~project-Project~~ components, which shall include labor and equipment. The decommissioning plan shall identify cost estimates for the removal of solar panels, racks, underground collection cables, access roads, transformers, substations, and other ~~project-Project~~ components. The decommissioning plan may also include anticipated costs for the replacement of panels or repowering the ~~project-Project~~ by upgrading equipment.

⁵ AIMPs were not required for the North Star Solar Project (15-33) issued in 2016 or the Sherco Solar Project (21-189) issued September 2022. Neither of those projects was located on prime farmland. The North Star Project in Chisago County was located on agricultural land that was not prime farmland and the Sherco Solar Project is located on the site of a former coal plant. AIMPs were required for the following projects: Aurora Solar (14-515), Marshall Solar (14-1052), Regal Solar (19-395), Elk Creek Solar (19-495), Louise Solar (20-647), and Red Rock Solar (19-620).

The Permittee shall also submit the decommissioning plan to the local unit of government having direct zoning authority over the area in which the ~~project~~Project is located. The Permittee shall ensure that it carries out its obligations to provide for the resources necessary to fulfill its requirements to properly decommission the ~~project~~Project at the appropriate time. The Commission may at any time request the Permittee to file a report with the Commission describing how the Permittee is fulfilling this obligation.

Permit Transfer

EERA recommends modifications to Section 12 of the permit, dealing with transfer of permit. The proposed changes include:

- formatting items the Permittee must provide the Commission into a list format for easier reading;
- eliminating unnecessary language about what the Commission may do;
- replacing “new Permittee” and “person or entity to whom the permit is requested to be transferred” with “transferee” to simplify the language; and
- requiring the transferee to provide the Commission a certification that it has read, understands and is able to comply with the plans and procedures it filed, and all conditions of the permit.

EERA believes the proposed changes improve clarity. By requiring the transferee to submit a certification, disputes in plans and procedures and conditions of the permit should be worked out before the transfer of permit request is submitted.

12. Permit Transfer

The Permittee may request at any time that the Commission transfer this permit to another person or entity. ~~The~~ (transferee). ~~In its request, the Permittee shall~~must provide the Commission with:

- (a) the name and description of the person or entity to whom the permit is requested to be transferred, transferee;*
- (b) the reasons for the transfer;*
- (c) a description of the facilities affected; and*
- (d) the proposed effective date of the transfer. The person to whom the permit is to be transferred shall*

The transferee must provide the Commission with ~~such~~ the name and contact information ~~as the Commission shall require to determine whether for the new Permittee can~~ site manager, as described in Section 4.3.2, and either a current version with e-docket reference, or a revised version of the following:

- (a) VMP, as described in Section 4.3.17;*
- (b) complaint procedures, as described in Section 7 and Attachment 1;*
- (c) ERP, as described in Section 8.10; and*
- (d) decommissioning plan, as described in Section 9.*

The transferee must provide the Commission with a certification that it has read, understands and is able to comply with the plans and procedures it filed, and all conditions of the permit. ~~The Commission may authorize transfer of the permit after affording the Permittee, the new Permittee, and interested persons such process as is required.~~

Special Conditions

EERA proposes several special permit conditions based on its review of the Project, recommendations of the DNR, and experience with other solar generating facilities.

Karst Geology

Due to the presence of karst features within portions of the site, EERA recommends a special condition requiring the permittee to file a geotechnical investigation report prepared by a third-party geotechnical engineer or authorized representative. The report should include methodology, results, and conclusions drawn from the geotechnical investigation with recommendations on project design and construction. The special conditions also preclude construction activity or placement of project infrastructure within 150 feet of active karst features. This special condition was included in the DSP included in EA.

5.1 Karst Geology

The Permittee shall file a geotechnical investigation report prepared for the Project construction area by a third-party geotechnical engineer or authorized representative. The report shall include methodology, results, and conclusions drawn from the geotechnical investigation with recommendations on project design and construction. The Permittee shall file the geotechnical report with the with the Commission at least 14 days prior to the pre-construction meeting.

The permittee shall not locate project infrastructure within 150 feet of documented active karst features and avoid all construction activity within 150 feet of documented active karst features. Active karst is defined as areas underlain by carbonate bedrock with less than 50 feet of sediment cover.

Wildlife-Friendly Erosion Control

EERA recommends a special condition requiring the Permittee to use .wildlife-friendly erosion control to minimize impacts to small animals. This condition is not a standard permit condition but is frequently recommended by DNR and has been included in many permits issued for solar, wind, and transmission lines. This special condition was included in the DSP included in EA.

5.2 Wildlife-Friendly Erosion Control

The Permittee shall use only “bio-netting” or “natural netting” types and mulch products without synthetic (plastic) fiber additives.

Northern Long-Eared Bat (NLEB)

EERA recommends a special condition requiring the Permittee to comply with the U.S. Fish and Wildlife Service (USFWS) guidance and requirements to minimize impacts to the NLEB, a federally-listed species. While the Project Area is primarily agricultural lands with little forested habitat, the nearby landscape includes riparian corridors, indicating a moderate probability of NLEB occurrence within the Project Area. The proposed language revises Section 5.4 of the Sample Site Permit as the USFWS guidance includes, but is not limited to, tree-clearing timeframes. This condition is not a standard permit condition but, depending upon a project’s location, has been included in many permits issued for solar, wind, and transmission lines. This special condition was included in the DSP included in EA.

5.3 Northern Long-Eared Bat (NLEB)

For Project construction, the Permittee shall comply with the U.S. Fish and Wildlife Service guidance and requirements in effect regarding NLEB, including tree clearing restrictions if applicable.

Loggerhead Shrike

EERA recommends a special condition to minimize disruption to Loggerhead Shrike habitat during the breeding season. The Loggerhead shrike is a state-listed endangered species that has been documented within one mile of the Project site. This special condition was included in the DSP included in EA.

5.4 Loggerhead Shrike

The permittee shall avoid tree and shrub removal within suitable Loggerhead Shrike habitat during the April through July breeding season. If tree or shrub removal will occur within during the breeding season, the permittee shall coordinate with DNR to identify potentially suitable habitat and ensure that a qualified surveyor inspects the trees/shrubs for active nests prior to removal.

Visual Screening Plan

Given the concern about visual impacts from the project that has been expressed by area residents and Dodge County, EERA believes that a special condition is appropriate for this project. EERA notes that 17 residences are adjacent to the site and the preliminary layout shows six homes with solar arrays on three or four sides of the home.

EERA proposes a special condition requiring a Visual Screening Plan. As proposed, the condition would require the VMP required under Section 4.3.17 of the site permit to include a Visual Screening Plan to mitigate visual impact from the Project to nearby residences and to address local government ordinances and setbacks. Byron Solar's draft VMP includes a placeholder for a "Screening Vegetation Management Unit" that is not fully developed. The proposed special condition requires development of that portion of the VMP, clarifies what types of information would be required for that unit, and provides for coordination with adjacent landowners and the county.

While the proposed special condition piggybacks on the existing VMP, it requires the Permittee provide specific information, coordination, and information for the visual screening element that would not necessarily be part of a VMP:

- **Type of Screening:** The special condition identifies specific information (e.g. species types, specific planting locations, provisions for watering and other maintenance activities) that would not necessarily be anticipated with the maintenance of the developed areas of the site.
- **Notification:** While the VMP condition requires coordination with *Department of Commerce, DNR, BWSR, MPCA, and the Department of Agriculture* in the development of the VMP and distribution of the VMP to landowners within the project boundary, the proposed special condition would specifically require coordination with adjacent landowners (by definition outside of the project boundary) and Dodge County and distribution of the Visual Screening Plan to adjacent landowners and Dodge County Environmental Services.

5.5 Visual Screening Plan

As part of the VMP required under Section 4.3.17 of this permit, the Permittee shall develop a site-specific Visual Screening Plan. The Visual Screening Plan shall be designed and managed to mitigate visual impacts to adjacent residences and address local government ordinances and setbacks.

The Permittee shall file documentation of coordination between landowners within 500 feet of the site boundary and Dodge County Office of Environmental Services at least 14 days prior to the pre-construction meeting with its VMP submittal. The Permittee shall provide a copy of the Visual Screening Plan to all landowners within 500 feet of the site boundary and Dodge County Environmental Services and shall file with the Commission an affidavit of its distribution of the Visual Screening Plan to landowners within 500 feet of the site boundary and Dodge County Environmental Services at least 14 days prior to the pre-construction meeting with its VMP submittal.

The Visual Screening Plan shall be developed in accordance with the Department of Commerce Guidance for Developing a Vegetation Establishment and Management Plan for Solar Facilities and shall include:

- a) management objectives for the screening of nearby residencies;
- b) a description of planned restoration and vegetation management activities at the screening locations, including how the screening locations will be prepared, timing of activities, how planting will occur, the types of tree and shrub species to be used, plans for watering and other maintenance;
- c) a description of how the screening will be monitored and evaluated to meet management objectives;
- d) a description of the management tools used to maintain screening vegetation (e.g., mowing, spot spraying, hand removal, etc.), including the timing and frequency of maintenance activities;
- e) identification of the third-party (e.g., consultant, contractor, site manager, etc.) contracted for restoration, monitoring, and long-term vegetation management of the screening;
- f) identification of on-site noxious weeds and invasive species (native and non-native) and the monitoring and management practices to be utilized; and
- g) a marked-up copy of the site plan showing how the location of the tree and shrub species.

Applicant-Proposed Modifications

In its direct testimony, Byron Solar proposed modifications to three sections of the DSP included in the EA. EERA generally supports Byron Solar's proposed modifications, but, for clarity, recommends some modifications to Byron Solar's proposals related to visual impacts and security fencing.

Aesthetics

Byron Solar proposed removing the requirement that it consider input pertaining to visual impacts from land management agencies in Section 4.3.8 of the DSP.⁶ Byron Solar states that it agrees to and has

⁶ Byron Solar, *Direct Testimony of Scott Wentzel*, October 11, 2022, eDockets ID: [202210-189689-05](#), at lines 398-407

considered input on visual impacts from landowners and adjacent residences but objected to the inclusion of “land management agencies” as vague and unnecessary.

EERA notes that a site permit issued by the Commission would preempt and supersede local land use rules, regulations, and ordinances. Many local jurisdictions have planning and zoning ordinances that address and attempt to minimize or mitigate visual impact from new land uses. In light of the preemption of a Commission-issued permit, EERA believes it is reasonable that the site permit acknowledge the interest and expertise of local jurisdictions and require the Permittee to consider input on visual impacts from local jurisdictions.

Upon review, EERA concurs with Byron Solar’s characterization of the term “land management agencies” as vague. EERA proposes the following modification to Section 4.3.8 to provide more clarity of the local authority to be consulted.

4.3.8 Aesthetics

The Permittee shall consider input pertaining to visual impacts from landowners and ~~land management agencies~~ the local unit of government having direct zoning authority over the area in which the Project is located. The Permittee shall use care to preserve the natural landscape, minimize tree removal and prevent any unnecessary destruction of the natural surroundings in the vicinity of the Project during construction and operation.

As noted in the discussion under Visual Screening Plan, EERA proposes a special condition in this proceeding requiring Byron Solar to develop a Visual Screening Plan as part of the required VMP.

Security Fencing

Byron Solar proposes modifying Section 4.3.31 of the DSP related to the design of security fencing to be consistent with the condition included in the site permit the Commission issued for Louise Solar.⁷ Byron Solar recommends the modification to ensure consistency with recently issued permits and provide for flexibility in designing a fence that meets the needs of the project in a way that affords due consideration to agency recommendations.

EERA supports Byron Solar’s request for clarity and generally agrees with Byron Solar’s recommendations on the matter. However, EERA recommends removing the specific reference to the DNR’s 2016 guidance. EERA notes that DNR is currently in the process of updating its guidance. Further, as Byron Solar notes, it does not anticipate that construction will begin until the latter part of 2024.⁸

EERA proposes the following modification to Section 4.3.31 of the site permit.

4.3.31 Security Fencing

The Permittee shall design the security fence surrounding the solar energy generating system to minimize the visual impact of the Project. ~~While maintaining compliance with the National Electric Safety Code,~~ The Permittee shall develop a final fence plan for the site that is consistent with DNR guidance for commercial solar facilities and is done in coordination with EERA and the DNR. ~~to further refine the appropriate fence design, identify ways to preclude wildlife~~

⁷ Wentzell Direct Testimony, at lines 409-437

⁸ Wentzell Direct Testimony, at lines 101-107

~~entanglement in the security fence, and to ensure adequate deer escape technology. The final fence plan Permittee shall be submitted the results of the coordination to the Commission as part of the site plan pursuant to Section 8.3.~~

Site Final Restoration

Byron Solar proposes modifying Section 9.2 of the DSP related to final site restoration to ensure consistency with the Decommissioning Plan required in Section. EERA supports Byron Solar’s modification to this section, and includes the entire condition below.

9.2 Site Final Restoration

Upon termination of operation of the Project, the Permittee shall have the obligation to dismantle and remove from the site all solar panels, mounting steel posts and beams, inverters, transformers, overhead and underground cables and lines, foundations, buildings, and ancillary equipment in accordance with the most recently filed and accepted decommissioning plan. To the extent feasible, the Permittee shall restore and reclaim the site to pre-Project conditions. Landowners may require the site be returned to agricultural production or may retain restored prairie vegetation, or other land uses as agreed to between the landowner and the Permittee. All access roads shall be removed unless written approval is given by the affected landowner requesting that one or more roads, or portions thereof, be retained. All such agreements between the Permittee and the affected landowner shall be submitted to the Commission prior to commencing restoration activities.

The Permittee shall restore the site in accordance with the requirements of this condition and file a notification of final restoration completion to the Commission within 18 months of termination of operation of the Project.

Route Permit Modifications

Commission staff filed a sample route permit on October 21, 2021.⁹The Draft Site Permit (DSP) prepared by EERA and included as Appendix C of the Environmental Assessment (EA) prepared for these proceedings makes several modifications to the sample site permit.¹⁰ These changes are shown in the markup version of a Sample Route Permit shown in Attachment B to this document and are summarized in Table 2.

Section	Permit Section Number		Proposed Modification
	Sample Permit	EERA-Proposed	
Cover Page	n/a	n/a	updates with Project-specific information update Executive Secretary name add 800 number to the request for document alternative format
Route Permit	1	1	updates with Project-specific information

⁹ Commission. *Briefing Papers, October 28, 2021, Agenda, Revised*. October 21, 2021, at attachment C, eDocket ID: [202110-179018-03](#)

¹⁰ EA, *Appendix D: Draft Route Permit*, eDocket ID: [20229-189238-13](#)

Section	Permit Section Number		Proposed Modification
	Sample Permit	EERA-Proposed	
Project Description	2	2	updates with Project-specific information
Project Location	2.1	2	deleted - Project Description (section 2) includes location information
Substations and Associated Facilities	2.2	n/a	deleted – the Project Substation is included in Site Permit
Structures	2.3	2.1	updates with Project-specific information
Conductors	2.4	2.2	updates with Project-specific information
Designated Route	3	3	updates with Project-specific information
Right-of-Way	4	4	updates with Project-specific information
Route Width Variations	4.1	4.1	change list formatting edit to clarify Permittee responsibility
Permit Distribution	5.1	5.1	edits to clarify compliance requirement
Access to Property	5.2	5.2	edits to clarify compliance requirement
Construction and Operation Practices	5.3	5.3	edit to eliminate redundancy
Field Representation	5.3.1	5.3.1	edits for consistency and to clarify compliance requirement
Employee Training and Education of Permit Terms and Conditions	5.3.2	5.3.2	edits to eliminate redundancy add recordkeeping requirement to clarify compliance requirement
Public Services and Public Utilities	5.3.3	5.3.3	edits to clarify compliance requirement
Temporary Workspace	5.3.4	5.3.4	edits to clarify Permittee responsibility
Noise	5.3.5	5.3.5	correct typo in rule citation edit for consistency
Aesthetics	5.3.6	5.3.6	edits for consistency and to clarify Permittee responsibility
Soil Erosion and Sediment Control	5.3.7	5.3.7	edit for consistency
Wetlands and Water Resources	5.3.8	5.3.8	edits for clarity and to clarify Permittee responsibility
Vegetation Management	5.3.9	5.3.9	edit for consistency
Application of Pesticides	5.3.10	5.3.10	edits for consistency and to clarify compliance requirement
Invasive Species	5.3.11	5.3.11	edits for consistency and to clarify compliance timing
Noxious Weeds	5.3.12	5.3.12	edits to clarify compliance requirement
Roads	5.3.13	5.3.13	edits for clarity and consistency edits to clarify Permittee responsibility clarify compliance requirement

Section		Permit Section Number		Proposed Modification
		Sample Permit	EERA-Proposed	
Archaeological and Historic Resources		5.3.14	5.3.14	edit for consistency edit to clarify compliance requirement
Avian Protection		5.3.15	5.3.15	edit to capitalize Project
Restoration		5.3.16	5.3.16	edit to correct a typo
Cleanup		5.3.17	5.3.17	edits to clarify Permittee responsibility
Damage		5.3.19	5.3.19	edits to clarify compliance requirement
Electric Field		5.4.2	5.4.2	edits to clarify Permittee responsibility
Interference with Communication Devices		5.4.3	5.4.3	edits to clarify Permittee responsibility
Safety Codes and Design Requirements		5.5.1	5.5.1	edits to clarify Permittee responsibility
Other Permits and Regulations		5.5.2	5.5.2	edits for clarity and consistency edit to clarify that staff can request records
Special Conditions	Vegetation Management Plan	n/a	6.1	adds special condition
	Independent Third-Party Monitor	n/a	6.2	adds special condition
	Karst Geology	n/a	6.3	adds special condition
	Wildlife-Friendly Erosion Control	n/a	6.4	adds special condition at the recommendation of DNR
	Northern Long-Eared Bat	n/a	6.5	adds special condition
	Loggerhead Shrike	6.6n/a	6.5	Add special condition at the recommendation of DNR
Complaint Procedures		8	8	edit to clarify that staff from Commission or Commerce can assist with unresolved or longstanding complaints
Plan and Profile		9.1	9.1	edit for consistency
Status Reports		9.2	9.2	edit for consistency
In-Service Date		9.3	9.3	edit for consistency
As-Builts		9.4	9.4	edit for consistency
Right of Entry		9.6	9.6	edit for clarity
Transfer of Permit		11	11	change text to a list format add transferee certification of ability to comply with permit
Compliance Filing Procedures for Permitted Energy Facilities		Attachment 2	Attachment 2	add compliance fillings table

As with proposed changes to the site permit, proposed changes to the route permit are can generally be grouped into the following categories:

Technical Changes:

Most of the modifications are technical changes that add items specific to the Project (e.g. permittee name, Project location, equipment details), make minor corrections for clarity (e.g. replace “care shall be used” with “the Permittee shall use care”), or provide more clarity by tying required filings with certain milestones (e.g. replacing “prior to construction” with “14 days prior to the pre-construction meeting”).

Permit Update of Standard Conditions:

As with the site permit, EERA proposes modifications to the transfer of the permit. Because the route permit is a construction permit and does not continue through operation the additional compliance requirements for the site permit are not included in this section.

11 Permit Transfer

The Permittee may request at any time that the Commission transfer this permit to another person or entity (transferee) ~~The Permittee shall provide the name and description of the person or entity to whom the permit is requested to be transferred, the reasons for the transfer, a description of the facilities affected, and the proposed effective date of the transfer. The person to whom the permit is to be transferred shall provide the Commission with such information as the Commission shall require to determine whether the new Permittee can comply with the conditions of the permit. The Commission may authorize transfer of the permit after affording the Permittee, the new Permittee, and interested persons such process as is required. In its request, the Permittee must provide the Commission with:~~

- (a) the name and description of the transferee;*
- (b) the reasons for the transfer;*
- (c) a description of the facilities affected; and*
- (d) the proposed effective date of the transfer.*

The transferee must provide the Commission with a certification that it has read, understands and is able to comply with the plans and procedures it filed, and all conditions of the permit.

Special Conditions

As with the site permit, EERA proposes several special permit conditions based on its review of the Project, recommendations of the DNR, and experience with other solar generating facilities.

EERA proposes the same special condition for the route permit addressing karst geology, wildlife-friendly erosion control, NLEB and migratory birds, and Loggerhead Shrike. as discussed above under Special Conditions for the site permit.

In addition, EERA proposes that the route permit also include two special conditions for an independent third-party monitor during construction and a VMP that are included as standard conditions in the proposed solar site permit.

EERA Comments
PUC Docket No. IP7041/GS-20-763, CN-20-764, TL-20-765
OAH Docket No. 5-2500-37275

Applicant-Suggested Modifications:

In its pre-filed testimony, Byron Solar proposed modifications to Section 5.3.6 of the DRP. As with Byron Solar's proposed modification to the DSP, EERA recommends that "land management agency" be replaced with "*the local unit of government having direct zoning authority over the area in which the Project is located.*"

EERA appreciates the opportunity to comment on the proposed project.

Sincerely,

A handwritten signature in black ink that reads "Suzanne Steinhauer". The signature is written in a cursive, flowing style.

Suzanne Lamb Steinhauer
EERA Environmental Review Manager

CERTIFICATE OF SERVICE

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

Minnesota Department of Commerce

Comments

Docket No. IP7041/GS-20-763, IP7041/CN-20-764, and IP7041/TL-20-765

Dated this **29th** day of **November 2022**

/s/Sharon Ferguson

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Larry	Rebman	larryemls@hotmail.com	EMLS, Inc	PO Box 122 Appleton, MN 56208	Electronic Service	No	OFF_SL_20-763_Official CC Service List
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_20-763_Official CC Service List
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	Electronic Service	No	OFF_SL_20-763_Official CC Service List
Nathaniel	Runke	nrunke@local49.org		611 28th St. NW Rochester, MN 55901	Electronic Service	No	OFF_SL_20-763_Official CC Service List
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th Pl E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_20-763_Official CC Service List
Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates	7400 Lyndale Ave S Ste 190 Richfield, MN 55423	Electronic Service	Yes	OFF_SL_20-763_Official CC Service List
Tom	Slukich	tom@nationalconductor.com	National Conductor Constructors	18119 Hwy 371 North Braiderd, MN 56401	Electronic Service	No	OFF_SL_20-763_Official CC Service List
Adam	Sokolski	adam.sokolski@edf-re.com	EDF Renewable Energy	10 Second Street NE Ste 400 Minneapolis, MN 55410	Electronic Service	No	OFF_SL_20-763_Official CC Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Suzanne	Steinhauer	suzanne.steinhauer@state.mn.us	Department of Commerce	85 7th Place East Suite 500 St. Paul, MN 55101	Electronic Service	No	OFF_SL_20-763_Official CC Service List
Mark	Strohhus	mstrohhus@greenergy.com	Great River Energy	12300 Elm Creek Boulevard Maple Grove, MN 553694718	Electronic Service	No	OFF_SL_20-763_Official CC Service List
Carl	Strohman	cjsmg@sbcglobal.net	SBC Global	105 East Edgewood Ave Indianapolis, IN 46227	Electronic Service	No	OFF_SL_20-763_Official CC Service List
Tom	Swafford	tswafford@umsi.us	Utility Mapping Services, Inc	3947 E Calvary Rd Suite 103 Duluth, MN 55803	Electronic Service	No	OFF_SL_20-763_Official CC Service List
Eric	Swanson	eswanson@winthrop.com	Winthrop & Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_20-763_Official CC Service List
Todd	Tadych	ttadych@atcllc.com	American Transmission Company LLC	5303 Fen Oak Dr Madison, WI 53718	Electronic Service	No	OFF_SL_20-763_Official CC Service List
Caren	Warner	caren.warner@state.mn.us	Department of Commerce	85 7th Place East Suite 280 St. Paul, MN 55101-2198	Electronic Service	No	OFF_SL_20-763_Official CC Service List
Cynthia	Warzecha	cynthia.warzecha@state.mn.us	Minnesota Department of Natural Resources	500 Lafayette Road Box 25 St. Paul, Minnesota 55155-4040	Electronic Service	No	OFF_SL_20-763_Official CC Service List
Elizabeth	Wefel	eawefel@flaherty-hood.com	Flaherty & Hood, P.A.	525 Park St Ste 470 Saint Paul, MN 55103	Electronic Service	No	OFF_SL_20-763_Official CC Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Scott	Wentzell	scott.wentzell@edf-re.com	EDF Renewables	10 NE 2nd St Ste 400 Minneapolis, MN 55413	Electronic Service	Yes	OFF_SL_20-763_Official CC Service List
Deanna	White	mncwa@cleanwater.org	Clean Water Action & Water Fund of MN	330 S 2nd Ave Ste 420 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_20-763_Official CC Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Michael	Ahern	ahern.michael@dorsey.com	Dorsey & Whitney, LLP	50 S 6th St Ste 1500 Minneapolis, MN 554021498	Electronic Service	No	OFF_SL_20-764_Official CC Service List
Kristine	Anderson	kanderson@greatermngas.com	Greater Minnesota Gas, Inc. & Greater MN Transmission, LLC	1900 Cardinal Lane PO Box 798 Faribault, MN 55021	Electronic Service	No	OFF_SL_20-764_Official CC Service List
Alison C	Archer	aarcher@misoenergy.org	MISO	2985 Ames Crossing Rd Eagan, MN 55121	Electronic Service	No	OFF_SL_20-764_Official CC Service List
James J.	Bertrand	james.bertrand@stinson.com	STINSON LLP	50 S 6th St Ste 2600 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-764_Official CC Service List
Brenda A.	Bjorklund	brenda.bjorklund@centerpointenergy.com	CenterPoint Energy	505 Nicollet Mall Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-764_Official CC Service List
Christina	Brusven	cbrusven@fredlaw.com	Fredrikson Byron	200 S 6th St Ste 4000 Minneapolis, MN 554021425	Electronic Service	No	OFF_SL_20-764_Official CC Service List
James	Canaday	james.canaday@ag.state.mn.us	Office of the Attorney General-RUD	Suite 1400 445 Minnesota St. St. Paul, MN 55101	Electronic Service	No	OFF_SL_20-764_Official CC Service List
Barbara	Case	barbara.case@state.mn.us	Office of Administrative Hearings	600 N. Robert St. St. Paul, Mn. 55101	Electronic Service	Yes	OFF_SL_20-764_Official CC Service List
Cody	Chilson	cchilson@greatermngas.com	Greater Minnesota Gas, Inc. & Greater MN Transmission, LLC	1900 Cardinal Ln PO Box 798 Faribault, MN 55021	Electronic Service	No	OFF_SL_20-764_Official CC Service List
Ray	Choquette	rchoquette@agp.com	Ag Processing Inc.	12700 West Dodge Road PO Box 2047 Omaha, NE 68103-2047	Electronic Service	No	OFF_SL_20-764_Official CC Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
John	Coffman	john@johncoffman.net	AARP	871 Tuxedo Blvd. St. Louis, MO 63119-2044	Electronic Service	No	OFF_SL_20-764_Official CC Service List
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_20-764_Official CC Service List
Riley	Conlin	riley.conlin@stoel.com	Stoel Rives LLP	33 S. 6th Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-764_Official CC Service List
Brooke	Cooper	bcooper@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022191	Electronic Service	No	OFF_SL_20-764_Official CC Service List
Hillary	Creurer	hcreurer@allete.com	Minnesota Power	30 W Superior St Duluth, MN 55802	Electronic Service	No	OFF_SL_20-764_Official CC Service List
George	Crocker	gwillc@nawo.org	North American Water Office	PO Box 174 Lake Elmo, MN 55042	Electronic Service	No	OFF_SL_20-764_Official CC Service List
Richard	Dornfeld	Richard.Dornfeld@ag.state.mn.us	Office of the Attorney General-DOC	Minnesota Attorney General's Office 445 Minnesota Street, Suite 1800 Saint Paul, Minnesota 55101	Electronic Service	No	OFF_SL_20-764_Official CC Service List
Michelle	Dreier	mdreier@electricalassociation.com		N/A	Electronic Service	No	OFF_SL_20-764_Official CC Service List
Bridget	Duffus	bduffus@fredlaw.com	Fredrikson & Byron, P.A.	200 South Sixth Street Suite 4000 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-764_Official CC Service List
Ron	Elwood	relwood@mnlsap.org	Legal Services Advocacy Project	970 Raymond Avenue Suite G-40 Saint Paul, MN 55114	Electronic Service	No	OFF_SL_20-764_Official CC Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
James C.	Erickson	jericksonkbc@gmail.com	Kelly Bay Consulting	17 Quechee St Superior, WI 54880-4421	Electronic Service	No	OFF_SL_20-764_Official CC Service List
Catherine	Fair	catherine@energycents.org	Energy CENTS Coalition	823 E 7th St St Paul, MN 55106	Electronic Service	No	OFF_SL_20-764_Official CC Service List
Kate	Fairman	kate.frantz@state.mn.us	Department of Natural Resources	Box 32 500 Lafayette Rd St. Paul, MN 551554032	Electronic Service	No	OFF_SL_20-764_Official CC Service List
John	Farrell	jfarrell@ilsr.org	Institute for Local Self-Reliance	2720 E. 22nd St Institute for Local Self-Reliance Minneapolis, MN 55406	Electronic Service	No	OFF_SL_20-764_Official CC Service List
Eric	Fehlhaber	efehlhaber@dakotaelectric.com	Dakota Electric Association	4300 220th St W Farmington, MN 55024	Electronic Service	No	OFF_SL_20-764_Official CC Service List
Annie	Felix Gerth	annie.felix-gerth@state.mn.us		Board of Water & Soil Resources 520 Lafayette Rd Saint Paul, MN 55155	Electronic Service	No	OFF_SL_20-764_Official CC Service List
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 551012198	Electronic Service	No	OFF_SL_20-764_Official CC Service List
Lucas	Franco	lfranco@liunagroc.com	LIUNA	81 Little Canada Rd E Little Canada, MN 55117	Electronic Service	No	OFF_SL_20-764_Official CC Service List
Daryll	Fuentes	energy@usg.com	USG Corporation	550 W Adams St Chicago, IL 60661	Electronic Service	No	OFF_SL_20-764_Official CC Service List
James	Garness	james.r.garness@xcelenergy.com		N/A	Electronic Service	No	OFF_SL_20-764_Official CC Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Edward	Garvey	edward.garvey@AESLconsulting.com	AESL Consulting	32 Lawton St Saint Paul, MN 55102-2617	Electronic Service	No	OFF_SL_20-764_Official CC Service List
Bruce	Gerhardson	bgerhardson@otpc.com	Otter Tail Power Company	PO Box 496 215 S Cascade St Fergus Falls, MN 565380496	Electronic Service	No	OFF_SL_20-764_Official CC Service List
Anita	Grace	anita@gracemulticultural.com	GRACE Multicultural	12959 196th LN NW Elk River, MN 55330	Electronic Service	No	OFF_SL_20-764_Official CC Service List
Bill	Grant	billgrant@minncap.org	Minnesota Community Action Partnership	MCIT Building 100 Empire Dr Ste 202 St. Paul, MN 55103	Electronic Service	No	OFF_SL_20-764_Official CC Service List
Todd J.	Guerrero	todd.guerrero@kutakrock.com	Kutak Rock LLP	Suite 1750 220 South Sixth Street Minneapolis, MN 554021425	Electronic Service	No	OFF_SL_20-764_Official CC Service List
Adam	Heinen	aheinen@dakotaelectric.com	Dakota Electric Association	4300 220th St W Farmington, MN 55024	Electronic Service	No	OFF_SL_20-764_Official CC Service List
Annete	Henkel	mui@mutilityinvestors.org	Minnesota Utility Investors	413 Wacouta Street #230 St.Paul, MN 55101	Electronic Service	No	OFF_SL_20-764_Official CC Service List
Corey	Hintz	chintz@dakotaelectric.com	Dakota Electric Association	4300 220th Street Farmington, MN 550249583	Electronic Service	No	OFF_SL_20-764_Official CC Service List
Michael	Hoppe	lu23@ibew23.org	Local Union 23, I.B.E.W.	445 Etna Street Ste. 61 St. Paul, MN 55106	Electronic Service	No	OFF_SL_20-764_Official CC Service List
MJ	Horner	mj.horner@xcelenergy.com		N/A	Electronic Service	No	OFF_SL_20-764_Official CC Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Kari	Howe	kari.howe@state.mn.us	DEED	332 Minnesota St, #E200 1ST National Bank Bldg St. Paul, MN 55101	Electronic Service	No	OFF_SL_20-764_Official CC Service List
Lori	Hoyum	lhoyum@mnpower.com	Minnesota Power	30 West Superior Street Duluth, MN 55802	Electronic Service	No	OFF_SL_20-764_Official CC Service List
Travis	Jacobson	travis.jacobson@mdu.com	Great Plains Natural Gas Company	400 N 4th St Bismarck, ND 58501	Electronic Service	No	OFF_SL_20-764_Official CC Service List
Alan	Jenkins	aj@jenkinsatlaw.com	Jenkins at Law	2950 Yellowtail Ave. Marathon, FL 33050	Electronic Service	No	OFF_SL_20-764_Official CC Service List
Richard	Johnson	Rick.Johnson@lawmoss.com	Moss & Barnett	150 S. 5th Street Suite 1200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-764_Official CC Service List
Sarah	Johnson Phillips	sarah.phillips@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-764_Official CC Service List
Breann	Jurek	bjurek@fredlaw.com	Fredrikson & Byron PA	200 South Sixth St Ste 400 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-764_Official CC Service List
Nick	Kaneski	nick.kaneski@enbridge.com	Enbridge Energy Company, Inc.	11 East Superior St Ste 125 Duluth, MN 55802	Electronic Service	No	OFF_SL_20-764_Official CC Service List
Ray	Kirsch	Raymond.Kirsch@state.mn.us	Department of Commerce	85 7th Place E Ste 500 St. Paul, MN 55101	Electronic Service	No	OFF_SL_20-764_Official CC Service List
Michael	Krikava	mkrikava@taftlaw.com	Taft Stettinius & Hollister LLP	2200 IDS Center 80 S 8th St Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-764_Official CC Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Karen	Kromar	karen.kromar@state.mn.us	MN Pollution Control Agency	520 Lafayette Rd Saint Paul, MN 55155	Electronic Service	No	OFF_SL_20-764_Official CC Service List
Nicolle	Kupser	nkupser@greatermngas.com	Greater Minnesota Gas, Inc. & Greater MN Transmission, LLC	1900 Cardinal Ln PO Box 798 Faribault, MN 55021	Electronic Service	No	OFF_SL_20-764_Official CC Service List
Peder	Larson	plarson@larkinhoffman.com	Larkin Hoffman Daly & Lindgren, Ltd.	8300 Norman Center Drive Suite 1000 Bloomington, MN 55437	Electronic Service	No	OFF_SL_20-764_Official CC Service List
James D.	Larson	james.larson@avantenergy.com	Avant Energy Services	220 S 6th St Ste 1300 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-764_Official CC Service List
Annie	Levenson Falk	annielf@cubminnesota.org	Citizens Utility Board of Minnesota	332 Minnesota Street, Suite W1360 St. Paul, MN 55101	Electronic Service	No	OFF_SL_20-764_Official CC Service List
Ryan	Long	ryan.j.long@xcelenergy.com	Xcel Energy	414 Nicollet Mall 401 8th Floor Minneapolis, MN 55401	Electronic Service	No	OFF_SL_20-764_Official CC Service List
Susan	Ludwig	sludwig@mnpower.com	Minnesota Power	30 West Superior Street Duluth, MN 55802	Electronic Service	No	OFF_SL_20-764_Official CC Service List
Kavita	Maini	kmains@wi.rr.com	KM Energy Consulting, LLC	961 N Lost Woods Rd Oconomowoc, WI 53066	Electronic Service	No	OFF_SL_20-764_Official CC Service List
Valerie	Means	valerie.means@state.mn.us	Public Utilities Commission	121 7th Place E Suite 350 St. Paul, MN 55101	Electronic Service	No	OFF_SL_20-764_Official CC Service List
Brian	Meloy	brian.meloy@stinson.com	STINSON LLP	50 S 6th St Ste 2600 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-764_Official CC Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Joseph	Meyer	joseph.meyer@ag.state.mn.us	Office of the Attorney General-RUD	Bremer Tower, Suite 1400 445 Minnesota Street St Paul, MN 55101-2131	Electronic Service	No	OFF_SL_20-764_Official CC Service List
Stacy	Miller	stacy.miller@minneapolismn.gov	City of Minneapolis	350 S. 5th Street Room M 301 Minneapolis, MN 55415	Electronic Service	No	OFF_SL_20-764_Official CC Service List
Dana	Mock	gsdlm@kmtel.com		25742 655th St Kasson, MN 55944	Electronic Service	No	OFF_SL_20-764_Official CC Service List
David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022093	Electronic Service	No	OFF_SL_20-764_Official CC Service List
Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP	33 South Sixth St Ste 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-764_Official CC Service List
David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency	220 South Sixth Street Suite 1300 Minneapolis, Minnesota 55402	Electronic Service	No	OFF_SL_20-764_Official CC Service List
Samantha	Norris	samanthanorris@alliantenergy.com	Interstate Power and Light Company	200 1st Street SE PO Box 351 Cedar Rapids, IA 524060351	Electronic Service	No	OFF_SL_20-764_Official CC Service List
Matthew	Olsen	molsen@otpc.com	Otter Tail Power Company	215 South Cascade Street Fergus Falls, MN 56537	Electronic Service	No	OFF_SL_20-764_Official CC Service List
Carol A.	Overland	overland@legalelectric.org	Legalelectric - Overland Law Office	1110 West Avenue Red Wing, MN 55066	Electronic Service	No	OFF_SL_20-764_Official CC Service List
John	Pacheco	johnpachecojr@gmail.com		N/A	Electronic Service	No	OFF_SL_20-764_Official CC Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Greg	Palmer	gpalmer@greatermngas.com	Greater Minnesota Gas, Inc. & Greater MN Transmission, LLC	1900 Cardinal Ln PO Box 798 Faribault, MN 55021	Electronic Service	No	OFF_SL_20-764_Official CC Service List
Jose	Perez	jose@hispanicsinenergy.com	Hispanics in Energy	1017 L Street #719 Sacramento, CA 95814	Electronic Service	No	OFF_SL_20-764_Official CC Service List
Jennifer	Peterson	jjpeterson@mnpower.com	Minnesota Power	30 West Superior Street Duluth, MN 55802	Electronic Service	No	OFF_SL_20-764_Official CC Service List
Catherine	Phillips	Catherine.Phillips@wecenergygroup.com	Minnesota Energy Resources	231 West Michigan St Milwaukee, WI 53203	Electronic Service	No	OFF_SL_20-764_Official CC Service List
Kevin	Pranis	kpranis@liunagro.com	Laborers' District Council of MN and ND	81 E Little Canada Road St. Paul, Minnesota 55117	Electronic Service	No	OFF_SL_20-764_Official CC Service List
Stephen	Rakow	stephen.rakow@state.mn.us	Department of Commerce	Suite 280 85 Seventh Place East St. Paul, MN 551012198	Electronic Service	No	OFF_SL_20-764_Official CC Service List
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_20-764_Official CC Service List
Kevin	Reuther	kreuther@mncenter.org	MN Center for Environmental Advocacy	26 E Exchange St, Ste 206 St. Paul, MN 551011667	Electronic Service	No	OFF_SL_20-764_Official CC Service List
Susan	Romans	sromans@allete.com	Minnesota Power	30 West Superior Street Legal Dept Duluth, MN 55802	Electronic Service	No	OFF_SL_20-764_Official CC Service List
Stephan	Roos	stephan.roos@state.mn.us	MN Department of Agriculture	625 Robert St N Saint Paul, MN 55155-2538	Electronic Service	No	OFF_SL_20-764_Official CC Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Nathaniel	Runke	nrunke@local49.org		611 28th St. NW Rochester, MN 55901	Electronic Service	No	OFF_SL_20-764_Official CC Service List
Jacob	Salisbury	Jacob.Salisbury@edf-re.com	EDF Renewables	10 NE 2nd St Ste 400 Minneapolis, MN 55413	Electronic Service	Yes	OFF_SL_20-764_Official CC Service List
Richard	Savelkoul	rsavelkoul@martinsquires.com	Martin & Squires, P.A.	332 Minnesota Street Ste W2750 St. Paul, MN 55101	Electronic Service	No	OFF_SL_20-764_Official CC Service List
Elizabeth	Schmiesing	eschmiesing@winthrop.com	Winthrop & Weinstine, P.A.	225 South Sixth Street Suite 3500 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-764_Official CC Service List
Matthew	Schuerger	matthew.schuerger@state.mn.us	Public Utilities Commission	121 7th Place East Suite 350 St. Paul, MN 55101	Electronic Service	No	OFF_SL_20-764_Official CC Service List
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th Pl E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_20-764_Official CC Service List
Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates	7400 Lyndale Ave S Ste 190 Richfield, MN 55423	Electronic Service	No	OFF_SL_20-764_Official CC Service List
Katie	Sieben	katie.sieben@state.mn.us	Public Utilities Commission	121 East 7th Place suite 350 St. Paul, MN 55101	Electronic Service	No	OFF_SL_20-764_Official CC Service List
Colleen	Sipiorski	Colleen.Sipiorski@wecenergygroup.com	Minnesota Energy Resources Corporation	700 North Adams St Green Bay, WI 54307	Electronic Service	No	OFF_SL_20-764_Official CC Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.	76 W Kellogg Blvd St. Paul, MN 55102	Electronic Service	No	OFF_SL_20-764_Official CC Service List
Adam	Sokolski	adam.sokolski@edf-re.com	EDF Renewable Energy	10 Second Street NE Ste 400 Minneapolis, MN 55410	Electronic Service	Yes	OFF_SL_20-764_Official CC Service List
Peggy	Sorum	peggy.sorum@centerpointenergy.com	CenterPoint Energy	505 Nicollet Mall Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-764_Official CC Service List
Jamez	Staples	jstaples@renewablenrgpartners.com	Renewable Energy Partners	3033 Excelsior Blvd S Minneapolis, MN 55416	Electronic Service	No	OFF_SL_20-764_Official CC Service List
Byron E.	Starns	byron.starns@stinson.com	STINSON LLP	50 S 6th St Ste 2600 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-764_Official CC Service List
Richard	Stasik	richard.stasik@wecenergygroup.com	Minnesota Energy Resources Corporation (HOLDING)	231 West Michigan St - P321 Milwaukee, WI 53203	Electronic Service	No	OFF_SL_20-764_Official CC Service List
Kristin	Stastny	kstastny@taftlaw.com	Taft Stettinius & Hollister LLP	2200 IDS Center 80 South 8th St Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-764_Official CC Service List
Suzanne	Steinhauer	suzanne.steinhauer@state.mn.us	Department of Commerce	85 7th Place East Suite 500 St. Paul, MN 55101	Electronic Service	No	OFF_SL_20-764_Official CC Service List
Cary	Stephenson	cStephenson@otpc.com	Otter Tail Power Company	215 South Cascade Street Fergus Falls, MN 56537	Electronic Service	No	OFF_SL_20-764_Official CC Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
James M	Strommen	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered	150 S 5th St Ste 700 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-764_Official CC Service List
Eric	Swanson	eswanson@winthrop.com	Winthrop & Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_20-764_Official CC Service List
Stuart	Tommerdahl	stommerdahl@otpc.com	Otter Tail Power Company	215 S Cascade St PO Box 496 Fergus Falls, MN 56537	Electronic Service	No	OFF_SL_20-764_Official CC Service List
John	Tuma	john.tuma@state.mn.us	Public Utilities Commission	121 7th Place East, Suite 350 St. Paul, MN 55101	Electronic Service	No	OFF_SL_20-764_Official CC Service List
Analeisha	Vang	avang@mnpower.com	Minnesota Power	30 W Superior St Duluth, MN 558022093	Electronic Service	No	OFF_SL_20-764_Official CC Service List
Lisa	Veith	lisa.veith@ci.stpaul.mn.us	City of St. Paul	400 City Hall and Courthouse 15 West Kellogg Blvd. St. Paul, MN 55102	Electronic Service	No	OFF_SL_20-764_Official CC Service List
Cynthia	Warzecha	cynthia.warzecha@state.mn.us	Minnesota Department of Natural Resources	500 Lafayette Road Box 25 St. Paul, Minnesota 55155-4040	Electronic Service	No	OFF_SL_20-764_Official CC Service List
Scott	Wentzell	scott.wentzell@edf-re.com	EDF Renewables	10 NE 2nd St Ste 400 Minneapolis, MN 55413	Electronic Service	Yes	OFF_SL_20-764_Official CC Service List
Samantha	Williams	swilliams@nrdc.org	Natural Resources Defense Council	20 N. Wacker Drive Ste 1600 Chicago, IL 60606	Electronic Service	No	OFF_SL_20-764_Official CC Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Joseph	Windler	jwindler@winthrop.com	Winthrop & Weinstine	225 South Sixth Street, Suite 3500 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-764_Official CC Service List
Kurt	Zimmerman	kwz@ibew160.org	Local Union #160, IBEW	2909 Anthony Ln St Anthony Village, MN 55418-3238	Electronic Service	No	OFF_SL_20-764_Official CC Service List
Patrick	Zomer	Pat.Zomer@lawmoss.com	Moss & Barnett PA	150 S 5th St #1200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-764_Official CC Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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David	Bell	david.bell@state.mn.us	Department of Health	POB 64975 St. Paul, MN 55164	Electronic Service	No	SPL_SL_CN - CERTIFICATE OF NEEDS
Randall	Doneen	randall.doneen@state.mn.us	Department of Natural Resources	500 Lafayette Rd, PO Box 25 Saint Paul, MN 55155	Electronic Service	No	SPL_SL_CN - CERTIFICATE OF NEEDS
Kate	Fairman	kate.frantz@state.mn.us	Department of Natural Resources	Box 32 500 Lafayette Rd St. Paul, MN 551554032	Electronic Service	No	SPL_SL_CN - CERTIFICATE OF NEEDS
Annie	Felix Gerth	annie.felix-gerth@state.mn.us		Board of Water & Soil Resources 520 Lafayette Rd Saint Paul, MN 55155	Electronic Service	No	SPL_SL_CN - CERTIFICATE OF NEEDS
Todd	Green	Todd.A.Green@state.mn.us	Minnesota Department of Labor & Industry	443 Lafayette Rd N St. Paul, MN 55155-4341	Electronic Service	No	SPL_SL_CN - CERTIFICATE OF NEEDS
Kari	Howe	kari.howe@state.mn.us	DEED	332 Minnesota St, #E200 1ST National Bank Bldg St. Paul, MN 55101	Electronic Service	No	SPL_SL_CN - CERTIFICATE OF NEEDS
Ray	Kirsch	Raymond.Kirsch@state.mn.us	Department of Commerce	85 7th Place E Ste 500 St. Paul, MN 55101	Electronic Service	No	SPL_SL_CN - CERTIFICATE OF NEEDS
Chad	Konickson	chad.konickson@usace.army.mil	U.S.Army Corps of Engineers	180 5th St # 700 Saint Paul, MN 55101	Electronic Service	No	SPL_SL_CN - CERTIFICATE OF NEEDS
Stacy	Kotch Egstad	Stacy.Kotch@state.mn.us	MINNESOTA DEPARTMENT OF TRANSPORTATION	395 John Ireland Blvd. St. Paul, MN 55155	Electronic Service	No	SPL_SL_CN - CERTIFICATE OF NEEDS

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Karen	Kromar	karen.kromar@state.mn.us	MN Pollution Control Agency	520 Lafayette Rd Saint Paul, MN 55155	Electronic Service	No	SPL_SL_CN - CERTIFICATE OF NEEDS
Dawn S	Marsh	dawn_marsh@fws.gov	U.S. Fish & Wildlife Service	Minnesota-Wisconsin Field Offices 4101 American Blvd E Bloomington, MN 55425	Electronic Service	No	SPL_SL_CN - CERTIFICATE OF NEEDS
Stephan	Roos	stephan.roos@state.mn.us	MN Department of Agriculture	625 Robert St N Saint Paul, MN 55155-2538	Electronic Service	No	SPL_SL_CN - CERTIFICATE OF NEEDS
Jayme	Trusty	execdir@swrdc.org	SWRDC	2401 Broadway Ave #1 Slayton, MN 56172	Electronic Service	No	SPL_SL_CN - CERTIFICATE OF NEEDS
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	Electronic Service	No	SPL_SL_CN - CERTIFICATE OF NEEDS
Cynthia	Warzecha	cynthia.warzecha@state.mn.us	Minnesota Department of Natural Resources	500 Lafayette Road Box 25 St. Paul, Minnesota 55155-4040	Electronic Service	No	SPL_SL_CN - CERTIFICATE OF NEEDS
Alan	Whipple	sa.property@state.mn.us	Minnesota Department Of Revenue	Property Tax Division 600 N. Robert Street St. Paul, MN 551463340	Electronic Service	No	SPL_SL_CN - CERTIFICATE OF NEEDS
Jonathan	Wolfgram	Jonathan.Wolfgram@state.mn.us	Office of Pipeline Safety	445 Minnesota St Ste 147 Woodbury, MN 55125	Electronic Service	No	SPL_SL_CN - CERTIFICATE OF NEEDS

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
James J.	Bertrand	james.bertrand@stinson.com	STINSON LLP	50 S 6th St Ste 2600 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-765_Official CC Service List
Michelle F.	Bissonnette	michelle.bissonnette@hdrinc.com	HDR Engineering, Inc.	Golden Hills Office Center 701 Xenia Ave S Ste 600 Minneapolis, MN 55416	Electronic Service	No	OFF_SL_20-765_Official CC Service List
B. Andrew	Brown	brown.andrew@dorsey.com	Dorsey & Whitney LLP	Suite 1500 50 South Sixth Street Minneapolis, MN 554021498	Electronic Service	No	OFF_SL_20-765_Official CC Service List
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PUC	CAO	consumer.puc@state.mn.us	Public Utilities Commission	Consumer Affairs Office 121 7th Place E Suite 350 St. Paul, MN 55101	Electronic Service	No	OFF_SL_20-765_Official CC Service List
Barbara	Case	barbara.case@state.mn.us	Office of Administrative Hearings	600 N. Robert St. St. Paul, Mn. 55101	Electronic Service	Yes	OFF_SL_20-765_Official CC Service List
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_20-765_Official CC Service List
Bill	Cook	bcook@rpu.org	Rochester Public Utilities	4000 East River Road NE Rochester, MN 55906	Electronic Service	No	OFF_SL_20-765_Official CC Service List
John	Crane	johncranefishing@gmail.com	Fishing	1250 Wee Gwaus DR SW Bemidji, MN 56601	Electronic Service	No	OFF_SL_20-765_Official CC Service List
George	Crocker	gwillc@nawo.org	North American Water Office	PO Box 174 Lake Elmo, MN 55042	Electronic Service	No	OFF_SL_20-765_Official CC Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Thomas	Davis	atdavis1972@outlook.com	-	1161 50th Ave Sherburn, MN 56171	Electronic Service	No	OFF_SL_20-765_Official CC Service List
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Richard	Dornfeld	Richard.Dornfeld@ag.state.mn.us	Office of the Attorney General-DOC	Minnesota Attorney General's Office 445 Minnesota Street, Suite 1800 Saint Paul, Minnesota 55101	Electronic Service	No	OFF_SL_20-765_Official CC Service List
John E.	Drawz	jdrawz@fredlaw.com	Fredrikson & Byron, P.A.	Suite 4000 200 South Sixth Street Minneapolis, MN 554021425	Electronic Service	No	OFF_SL_20-765_Official CC Service List
Bridget	Duffus	bduffus@fredlaw.com	Fredrikson & Byron, P.A.	200 South Sixth Street Suite 4000 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-765_Official CC Service List
Cory	Dutcher	cory.dutcher@ge.com	GE Power and Water	1 River Rd. Bldg. 37-413 Schenectady, NY 12345	Electronic Service	No	OFF_SL_20-765_Official CC Service List
Kristen	Eide Tollefson	healingsystems69@gmail.com	R-CURE	28477 N Lake Ave Frontenac, MN 55026-1044	Electronic Service	No	OFF_SL_20-765_Official CC Service List
Scott	Ek	scott.ek@state.mn.us	Public Utilities Commission	121 7th Place East Suite 350 St. Paul, MN 55101	Electronic Service	No	OFF_SL_20-765_Official CC Service List
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 551012198	Electronic Service	No	OFF_SL_20-765_Official CC Service List

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Valerie	Herring	vherring@taftlaw.com	Taft Stettinius & Hollister LLP	2200 IDS Center 80 S. Eighth Street Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-765_Official CC Service List
Scott	Johnson	Scott.Johnson@ci.medina. mn.us	City of Medina	2052 County Road 24 Medina, MN 55340-9790	Electronic Service	No	OFF_SL_20-765_Official CC Service List
Tom	Karas	tomskaras@gmail.com		3171 309th Ave NW Cambridge, MN 55008	Electronic Service	No	OFF_SL_20-765_Official CC Service List
Bruce	King	bruce@ranww.org	Realtors, Association of Northwestern WI	Suite 3 1903 Keith Street Eau Claire, WI 54701	Electronic Service	No	OFF_SL_20-765_Official CC Service List
Chris	Kopel	chrisk@CMPASgroup.org	Central Minnesota Municipal Power Agency	459 S Grove St Blue Earth, MN 56013-2629	Electronic Service	No	OFF_SL_20-765_Official CC Service List
Stacy	Kotch Egstad	Stacy.Kotch@state.mn.us	MINNESOTA DEPARTMENT OF TRANSPORTATION	395 John Ireland Blvd. St. Paul, MN 55155	Electronic Service	No	OFF_SL_20-765_Official CC Service List
Karen	Kromar	karen.kromar@state.mn.us	MN Pollution Control Agency	520 Lafayette Rd Saint Paul, MN 55155	Electronic Service	No	OFF_SL_20-765_Official CC Service List
Brian	Meloy	brian.meloy@stinson.com	STINSON LLP	50 S 6th St Ste 2600 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-765_Official CC Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Dana	Mock	gsdlm@kmtel.com		25742 655th St Kasson, MN 55944	Electronic Service	No	OFF_SL_20-765_Official CC Service List
Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP	33 South Sixth St Ste 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-765_Official CC Service List
Dan	Nelson	Dan.Nelson@ISGinc.com	I&S Group	115 E Hickory St Ste 300 Mankato, MN 56001	Electronic Service	No	OFF_SL_20-765_Official CC Service List
Carol A.	Overland	overland@legalelectric.org	Legalelectric - Overland Law Office	1110 West Avenue Red Wing, MN 55066	Electronic Service	No	OFF_SL_20-765_Official CC Service List
Kevin	Peterson	kjp@ibew160.org	IBEW Local 160	1109 Northway Lane NE Rochester, MN 55906	Electronic Service	No	OFF_SL_20-765_Official CC Service List
Angela	Piner	angela.piner@hdrinc.com	HDR, Inc.	Suite 600 701 Xenia Avenue South Suite 600 Minneapolis, MN 55416	Electronic Service	No	OFF_SL_20-765_Official CC Service List
Stephen	Rakow	stephen.rakow@state.mn.us	Department of Commerce	Suite 280 85 Seventh Place East St. Paul, MN 551012198	Electronic Service	No	OFF_SL_20-765_Official CC Service List
Larry	Rebman	larryemls@hotmail.com	EMLS, Inc	PO Box 122 Appleton, MN 56208	Electronic Service	No	OFF_SL_20-765_Official CC Service List
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_20-765_Official CC Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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	Electronic Service	No	OFF_SL_20-765_Official CC Service List
Nathaniel	Runke	nrunke@local49.org		611 28th St. NW Rochester, MN 55901	Electronic Service	No	OFF_SL_20-765_Official CC Service List
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th Pl E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_20-765_Official CC Service List
Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates	7400 Lyndale Ave S Ste 190 Richfield, MN 55423	Electronic Service	Yes	OFF_SL_20-765_Official CC Service List
Tom	Slukich	tom@nationalconductor.com	National Conductor Constructors	18119 Hwy 371 North Brainterd, MN 56401	Electronic Service	No	OFF_SL_20-765_Official CC Service List
Adam	Sokolski	adam.sokolski@edf-re.com	EDF Renewable Energy	10 Second Street NE Ste 400 Minneapolis, MN 55410	Electronic Service	No	OFF_SL_20-765_Official CC Service List
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Mark	Strohfus	mstrohfus@grenergy.com	Great River Energy	12300 Elm Creek Boulevard Maple Grove, MN 553694718	Electronic Service	No	OFF_SL_20-765_Official CC Service List
Carl	Strohman	cjsmg@sbcglobal.net	SBC Global	105 East Edgewood Ave Indianapolis, IN 46227	Electronic Service	No	OFF_SL_20-765_Official CC Service List

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Eric	Swanson	eswanson@winthrop.com	Winthrop & Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_20-765_Official CC Service List
Todd	Tadych	ttadych@atcllc.com	American Transmission Company LLC	5303 Fen Oak Dr Madison, WI 53718	Electronic Service	No	OFF_SL_20-765_Official CC Service List
Caren	Warner	caren.warner@state.mn.us	Department of Commerce	85 7th Place East Suite 280 St. Paul, MN 55101-2198	Electronic Service	No	OFF_SL_20-765_Official CC Service List
Cynthia	Warzecha	cynthia.warzecha@state.mn.us	Minnesota Department of Natural Resources	500 Lafayette Road Box 25 St. Paul, Minnesota 55155-4040	Electronic Service	No	OFF_SL_20-765_Official CC Service List
Elizabeth	Wefel	eawefel@flaherty-hood.com	Flaherty & Hood, P.A.	525 Park St Ste 470 Saint Paul, MN 55103	Electronic Service	No	OFF_SL_20-765_Official CC Service List
Scott	Wentzell	scott.wentzell@edf-re.com	EDF Renewables	10 NE 2nd St Ste 400 Minneapolis, MN 55413	Electronic Service	No	OFF_SL_20-765_Official CC Service List
Deanna	White	mncwa@cleanwater.org	Clean Water Action & Water Fund of MN	330 S 2nd Ave Ste 420 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_20-765_Official CC Service List