

August 6, 2024

Will Seuffert
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, Minnesota 55101-2147

RE: **Comments of the Minnesota Department of Commerce, Division of Energy Resources**
Docket No. E999/PR-24-12

Dear Mr. Seuffert:

The Minnesota Department of Commerce, Division of Energy Resources (Department) has reviewed docket filings and verified that, other than the exceptions mentioned in the attached comments, filing utilities have complied with the Renewable Energy Standard (RES) requirement and compliance reporting. In total, utilities retired renewable energy credits (RECs) representing 24.5 percent of their Minnesota retail sales.

Sincerely,

/s/ Dr. Sydnie Lieb
Assistant Commissioner of Regulatory Affairs
Energy

LG/ar
Attachments



Before the Minnesota Public Utilities Commission

Comments of the Minnesota Department of Commerce Division of Energy Resources

Docket No. E999/PR-24-12

I. INTRODUCTION

Except for Xcel Energy, Minn. Stat. §216B.1691, subd. 2(a) requires utilities to obtain at least 20 percent of their Minnesota retail sales from renewable energy between 2020 and 2025. The standard was modified per Minn. Stat. §216B.1691, subd. 2(b) to require Xcel Energy to obtain 30 percent of its Minnesota retail sales from renewables.

Minn. Stat. §216B.1691, subd. 2 requires a public utility to generate or procure enough solar energy to supply at least 1.5% of its retail electric sales in Minnesota with solar energy. Of the 1.5% solar, at least 10% must come from solar photovoltaic devices with 40-kilowatt (kW) capacity or less. Public utilities with 50,000 to 200,000 retail electric customers may apply individual customers' community-solar garden subscriptions of 40 kW or less toward the 10% small-scale carveout.¹

Minn. Stat. §216B.1691, subd. 3 establishes filing requirements for electric utilities subject to the statute. Minnesota Public Utilities Commission (MNPUCC or Commission) staff developed a reporting template which includes statutorily mandated reporting information. As the State Legislature has altered the reporting requirements, Commission staff has updated the template.

On March 13, 2024, the Commission issued a *Notice of Renewable Energy Certificate (REC) Retirement for Renewable Energy Standard, Solar Energy Standard, and Green Pricing Programs*. The Notice required utilities subject to §216B.1691 (RES Statute) to file a report detailing their compliance with the 2023 RES requirements by June 1, 2024.

II. BACKGROUND OF THE DOCKET

A. RELEVANT STATUTORY CHANGES IN 2023

The Legislature adopted H.F. 7² in 2023, which amended several statutes instrumental in accelerating Minnesota's drive toward renewable carbon-free electricity generation. In addition to other changes, H.F. 7 broadened the definition of "electric utility" for purposes of Minn. Stat. §216B.1691 compliance.³ As a result, the list of electric utilities required to report in this docket expanded. Reporting entities now also include cooperative electric associations or municipal utilities that provide electric service and are not members of a generation and transmission cooperative electric association, a municipal power agency, or a power district.

¹ Minn. Stat. §216B.1691, subd. 2f (c)(2).

² 2023 Minn. Laws ch. 7.

³ *Id.*, § 5 (codified at Minn. Stat. § 216B.1691, subd. 2a).

H.F. 7 also expanded the required information for § 216B.1691 compliance reporting. The number of employees and efforts to retrain certain sectors, impacts on environmental justice, and workforce diversity are a few of the new requirements.

B. CLARIFYING DOCKETS

The Commission opened docket E-999/CI-23-151 on April 28, 2023, to solicit comments and determine if the industry needed clarification about implementing changes under H.F. 7.⁴ After feedback and consideration, the Commission released its December 6, 2023 Order (Clarifying Order).⁵ In the Clarifying Order, the Commission stated that it “will continue its practice of listing each utility subject to the standards under Minn. Stat. § 216B.1691 to promote clarity and consistency in statutory compliance.”⁶ The order listed an additional 24 entities required to report due to the changes effected by H.F. 7.⁷ With the exception of Connexus Cooperative, all were municipally owned electric utilities.

In the same order, the Commission determined that “Electric utilities that provide power to distribution utilities are allowed to report on behalf of each electric utility they serve.”⁸ The Commission agreed with the contention that power suppliers are more familiar with the renewable energy standard reporting and that such reporting could be onerous for smaller utilities with fewer resources.⁹

On April 12, 2024, the Commission issued another order (Order Further Clarifying) in the same docket for additional clarification.¹⁰ Order point 1 states:

Electric utilities subject to Minn. Stat. § 216B.1691 that intend to report on behalf of one or more other electric utilities must file a list of the electric utilities they intend to report on behalf of that includes the portion of each utility’s total retail electric sales to be covered by the final report. For the current 2023 reporting year, these reports shall be provided within ten business days after the issuance of this order. Future reports shall be filed by February 1 each year. These reports shall be filed in the applicable YR-12 REC retirement docket.

While several of the power suppliers should have filed on behalf of municipal utilities they serve to comply with Order point 1 above, and are required to file due to H.F. 7 changes, only Otter Tail Power¹¹ and Minnesota Power¹² filed lists of entities on whose behalf they would report; both did so in docket E-999/CI-23-151.

⁴ See *In the Matter of Investigation into Implementing Changes to the Renewable Energy Standard and the Newly Created Carbon Free Standard under Minn. Stat. § 216B.1691*, Notice of Comment Period, issued April 28, 2023, Docket no. E-999/CI-23-151, Doc. Id. 20234-195349-01.

⁵ *Order Clarifying Implementation of Changes to Minn. Stat. §216B.1691 and Directing Additional Comment Period*, Dec.6, 2023, Doc. Id. 202312-201019-01.

⁶ Id. at II.B., p. 4.

⁷ Id. at II.B., Table 1, p. 4, See also Order pt. 1.

⁸ Id. at Order pt. 3.

⁹ Id. at II.A., p. 3

¹⁰ *Order Further Clarifying Implementation of Changes to Minn. Stat. §216B.1691*, April 12, 2024, Doc. No. 20244-205306-01.

¹¹ Compliance Filing, April 19, 2024, Doc. Id. 20244-205719-01, three entities required to report this year receive power from Otter Tail.

¹² Compliance Filing, April 26, 2024, Doc. Id. 20244-206044-01, none of the entities required to report as of the H.F. changes receive power from Minnesota Power.

III. DEPARTMENT ANALYSIS

A. REPORTING ENTITIES

The following electric utilities filed on time, provided the required information, and met or exceeded the statutorily required REC retirements:

Table A – Utilities Self-Reporting

Utility	2023 MN Retail Sales MWhs	RES Req. %	RES Req. MWhs	RECs Retired
Basin Electric Power Cooperative	1,406,189	20%	281,238	281,239
Central Minnesota Municipal Power Agency	544,868	20%	108,974	108,974
Connexus Energy Cooperative	2,093,902	20%	418,781	418,781
Dairyland Power Cooperative	867,973	20%	173,595	174,974
East River Electric	1,166,414	20%	233,283	233,289
Great River Energy	8,130,813	20%	1,626,163	1,628,930
Heartland Power Cooperative	275,854	20%	55,171	55,172
L&O Power Cooperative	450,311	20%	90,063	90,063
Minnesota Power	8,927,812	20%	1,785,563	1,785,563
Minnkota Power Cooperative ¹³	1,879,460	20%	375,892	375,892
Minnesota Municipal Power Agency	1,865,561	20%	373,113	373,113
Missouri River Energy Services	1,685,284	20%	337,057	337,057
Moose Lake Water & Light Commission	33,931	20%	6,787	6,788

¹³ Minnkota also reports on behalf of Northern Municipal Power Agency, who has the following ten Minnesota municipal participants: Bagley Public Utilities, Baudette Municipal Utilities, Fosston Municipal Utilities, Halstad Municipal Utilities, Hawley Public Utilities, Roseau Municipal Utilities, City of Stephen Utilities, Thief River Falls Municipal Utilities, City of Warren Water and Light, Warroad Municipal Utilities.

Northwestern Wisconsin Electric Company ¹⁴		20%		
Otter Tail Power	2,803,454	20%	560,691	560,691
Southern Minnesota Energy Cooperative	743,136	20%	148,628	148,628
Southern Minnesota Municipal Power Agency	2,746,916	20%	549,384	549,384
Xcel Energy	28,695,594	30%	8,608,679	8,608,679
TOTAL	64,317,472		15,733,060	15,737,217
REC Retirements as a percentage of Minnesota retail sales				24.5%

Suppliers filed information on behalf of the following municipal electric utilities which were added to the list of required filers per H.F. 7¹⁵:

Table B – Reported Information for Utilities Newly Defined as “Electric Utility” per H.F. 7

Municipal Utility	2023 MN Retail Sales MWhs	Entity Reporting on Utility’s Behalf
Dundee	680	Southern Minnesota Energy Cooperative ¹⁶
Lanesboro	6,893	Dairyland Power Cooperative
Newfolden	1,911,552	Otter Tail Power
Nielsville	68,678	Otter Tail Power
Shelly	660,889	Otter Tail Power
St. Charles	23,951	Dairyland Power Cooperative

¹⁴ Northwestern Wisconsin Electric serves approximately 114 Minnesota customers with 2023 sales of 23,197 MWhs. The Commission permits NWECE to comply with its MN RES requirements with the submission of its Wisconsin RPS compliance report. The Company retired 25,865 RECs or 14.48% of its 3-year average Wisconsin retail sales of 178,625 MWhs. NWECE generated 32,426 MWh of renewable energy in 2023.

¹⁵ Note that Dairyland did not file a list of municipal utilities on whose behalf it would be filing, as stated in the April 12, 2024 Order, but nonetheless included information on Lanesboro and St. Charles in its filing.

¹⁶ Southern Minnesota Energy Cooperative noted in the Cover Letter to its Report that “The Village of Dundee is included in Federal Rural Electric Assn sales for 2023 and is footnoted accordingly.” See Doc. Id. 20244-205753-1.

B. ENTITIES FAILING TO REPORT

Entities previously defined as an “electric utility” filed the required information much as they did in 2023, however, most of the newly defined as such due to H.F. 7 did not file. Suppliers did not file the information on their behalf in most cases. As previously noted, Otter Tail and Minnesota Power were the only the entities expected to report on behalf of municipal utilities filing letters stating that they would report for another utility, as mandated by the Clarifying Order and the Order Further Clarifying.

Dairyland Power Cooperative (Dairyland), which did not file a letter listing utilities on whose behalf it would report, filed information for two of the ten utilities on whose behalf it should have reported information per the H.F. 7 changes.¹⁷

Table C lists each utility that was expected to file, due to the changes imposed by H.F. 7, and the entity that should have filed on the utility’s behalf.

Table C – Utilities Newly Defined as “Electric Utility” per H.F. 7 That Failed to Report

Utility	Entity Expected to Report on Utility’s Behalf
Ada	Xcel
Alvarado	Minnkota
Alpha	Great River Energy
Brewster	(MRES via Worthington Municipal Utilities); currently 100% renewable w/RECs from WMU)
Caledonia	Dairyland Power Cooperative
Ceylon	Great River Energy
Eitzen	Dairyland Power Cooperative G&T via MiEnergy Cooperative
Harmony	Dairyland Power Cooperative G&T via MiEnergy Cooperative
Kasota	Xcel
Mabel	Dairyland Power Cooperative G&T via MiEnergy Cooperative
Peterson	Dairyland Power Cooperative G&T via MiEnergy
Round Lake	Great River Energy G&T via Federated Co-op
Rushford	Dairyland Power Cooperative G&T via MiEnergy Cooperative
Rushmore	Great River Energy
Spring Grove	Dairyland Power Cooperative G&T via MiEnergy Cooperative
Whalen	Dairyland Power Cooperative G&T via MiEnergy Cooperative

¹⁷ As noted in Section II., Dairyland did not file a list of utilities on whose behalf it would report.

A high percentage of electric utilities in Table C should have reported but have not. It is possible that these same electric utilities misinterpreted the Clarifying Order or the Order Further Clarifying and have expected their power supplier to file on their behalf, but the supplier has not filed, expecting the utility to self-report. It appears that confusion remains as to which entities report on behalf of municipal electric utilities.

Worthington sells and delivers all Brewster's required energy under a power supply agreement. Brewster is not a member of Missouri River Energy Services (MRES) but Worthington is a member; MRES reports REC retirements on behalf of Worthington. To prevent double counting retired RECs, the Commission adopted MRES's recommendation to exclude sales by Worthington to Brewster in annual compliance reporting.¹⁸ The Department notes that no power supplier filed a report listing Brewster as a utility they intend to file on behalf of as required in Order Point 1 or the Order Further Clarifying.

MiEnergy Cooperative (MiEnergy) and Federated Rural Electric Association (Federated) are members of the Southern Minnesota Energy Cooperative (SMEC), which reported on behalf of both entities. MiEnergy and Federated were expected to report on behalf of eight of the municipal utilities that did not report (Eitzen, Harmony, Mabel, Peterson, Rushford, Spring Grove, Whalen, and Round Lake). Given that SMEC was in compliance, these eight municipal electric utilities should also be considered in compliance. However, the Department was unable to verify this information due to the fact that neither MiEnergy, Federated or SMEC filed a list of the electric utilities they intend to report on behalf of as required in Order Point 1 of the Order Further Clarifying.

By that same approach, Great River Energy (GRE) should have reported separately for Alpha, Ceylon, and Rushmore; Dairyland should have reported separately for Caledonia; Minnkota should have reported separately on behalf of Alvarado; and Xcel should have reported separately for Ada and Kasota. While GRE, Dairyland, Minnkota, and Xcel, the supplying entities, were in compliance, and compliance should extend to the seven municipal electric utilities, the Department was unable to verify this information due to the fact that these power suppliers also did not file a list of the electric utilities they intend to report on behalf of as required in Order Point 1 of the Order Further Clarifying.

The Department reached out to Xcel on July 12, 2024, for information on Ada and Kasota. Xcel returned the call on July 19¹⁹ and stated that, due to confusion and lack of communication, it was not clear which entity would provide REC reports for the two cities. The company stated that it would file a supplement when it obtained the information. Without this information, the Department cannot determine if Ada and Kasota are compliant. GRE sent a similar response to the Department's attempt to reach out.²⁰

The Department recommends that in future years, each electric utility, including municipal electric utilities, be required to notify the Department whether they will file on their own behalf the following year or if their power supplier will be doing so on their behalf. Joint filing should be encouraged. That same filing should be sent as a notice to the supplier expected to submit the filing to clear up confusion and ensure compliance reporting.

The Department recommends further that the Commission require each entity expected to report on the Utility's behalf in Table C above, file a letter in Docket No. E-999/CI-23-151 within 30 days of the Commission Order, either affirming their responsibility to report on the Utilities behalf or stating they are not responsible for

¹⁸ See Order Further Clarifying, Order pt. 3. MRES and its members are in compliance, indicating that Brewster is also in compliance.

¹⁹ See transcript of phone call from Rebecca Eilers, Attachment 1.

²⁰ See email thread between Ann Benson Monn and Andrew Bahn, Attachment 2.

reporting on the Utility's behalf. If the entity states it is not responsible for reporting on the utility's behalf, it should provide the name of the entity that is responsible for reporting, if known.

IV. MINNESOTA SES COMPLIANCE

Two of the three utilities required to report their SREC and small SREC retirements failed to meet the mandated requirements. These utilities were not far from the set standards, as indicated in Table D.

Table D Minnesota SES Compliance – 2023

Utility	2023 MN Retail Sales MWhs	SES Exempt Retail Sales	Sales Subject to SES	Total SES Req.	Total Req.	Total SRECs Retired	Small Solar Carve-out	Total Small SRECs Retired.
Minnesota Power	8,478,783	5,643,916	2,834,867	1.5%	42,523	42,523	4,252	4,252
Otter Tail Power	2,800,812	67,278	2,733,534	1.5%	41,003	39,950	4,100	3,047
Xcel Energy	28,695,594	200,718	28,494,876	1.5%	427,423	427,124	42,742	42,713

To ensure that the noncompliant utilities get back on track for reporting in future years, the Department recommends that utilities that fail to meet their SREC and small SREC retirements be required to provide an explanation for not meeting the requirement(s) in the current reporting year and plans for how they will meet the requirement(s) in subsequent years.

V. DEPARTMENT RECOMMENDATIONS

The Department has reviewed the filings in this docket and determines that, apart from those mentioned in Section IV. and V. above, all reporting utilities have complied with the RES requirement.

To ensure future reporting complies with the new requirements imposed by H.F. 7, the Department recommends that all electric utilities, as defined by H.F. 7, be required to file an annual letter by February 1 indicating if they will:

- Report on their own behalf; or
- If a supplier will report on their behalf; or
- If they will be reporting on behalf of another utility or utilities and list which utilities on whose behalf they will report.

The Department recommends that this letter be filed in the YR-12 docket and, in cases where a supplier is expected to file on behalf of a utility, notice be sent to the utility to encourage open communication between the supplier and the utility. Similarly, if a supplier intends to report for a utility, the supplier should send the required letter to the utility. Joint filings between suppliers and the utility on whose behalf the supplier files should be encouraged.

From: [Bahn, Andrew P \(COMM\)](#)
To: [Gonzalez, Lisa \(COMM\)](#)
Subject: FW: Voice Mail (1 minute and 17 seconds)
Date: Friday, July 19, 2024 3:59:12 PM
Attachments: [audio.mp3](#)

From: REBECCA EILERS <+16512479996>
Sent: Friday, July 19, 2024 10:46 AM
To: Bahn, Andrew P (COMM) <andrew.p.bahn@state.mn.us>
Subject: Voice Mail (1 minute and 17 seconds)

Hi, Andy, it's Rebecca Eilers calling from Excel Energy. I wanted to circle back with you on that renewable energy standard report and the two cities, Aida and Kasota. It took me a little while to figure out who in the company are our best contacts for those two cities. Finally, track that down and IT it looks like we probably had a failure to communicate with them and make sure it was clear that they understood what the requirement was and work with them as closely as we should have to see if either we should file it for them or they were planning to do it on their own. So we're in the process of doing some outreach to those cities. I'm we either Excel Energy or those cities and we'll get it worked out. Somebody will file a supplement, I think to make sure we get those reports in some fashion. I can keep you posted as I get a little more clarity on it. I just wanted to update you that I have been working on it and we just haven't quite reached a resolution. If you have any questions, you can call me on my cell phone. I am kind of out of the office next week, but I'm happy to happy to chat about it if you need to. My cell phone number is 651-247-9996. Thanks Andy. Have a good one. Thanks.

You received a voice mail from [REBECCA EILERS](#).

Thank you for using Transcription! If you don't see a transcript above, it's because the audio quality was not clear enough to transcribe.

[Set Up Voice Mail](#)

From: [Bahn, Andrew P \(COMM\)](#)
To: [Gonzalez, Lisa \(COMM\)](#)
Subject: FW: Docket 24-12 and Municipal Electric Utilities
Date: Friday, July 19, 2024 3:59:44 PM
Attachments: [image001.png](#)

From: Monn, Ann GRE-MG <AMonn@GREnergy.com>
Sent: Thursday, July 18, 2024 10:18 AM
To: Bahn, Andrew P (COMM) <andrew.p.bahn@state.mn.us>
Subject: RE: Docket 24-12 and Municipal Electric Utilities

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Hi Andy,

Thanks for following up! Unfortunately we were not able to confirm anything based on our internal information, so we've reached out to our members in those areas (Federated & Nobles). Hopefully we'll hear back from them yet this week. I will let you know as soon as we do.

Let me know if you need anything else before then.

Thanks again,
Ann

Ann Benson Monn

Manager, Renewable Energy Resources

Resource Planning

Great River Energy

12300 Elm Creek Boulevard

Maple Grove, MN 55369

763-445-6125 / cell: 612-358-8232 / fax: 763-445-6925

amonn@greenergy.com

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From: Bahn, Andrew P (COMM) <andrew.p.bahn@state.mn.us>
Sent: Friday, July 12, 2024 12:26 PM
To: Monn, Ann GRE-MG <AMonn@GREnergy.com>
Subject: Docket 24-12 and Municipal Electric Utilities

This email was sent by an external sender. Opening attachments or clicking links from untrusted sources may cause damage to you and Great River Energy.

Hi Ann,

Have you heard anything from your analysts/experts on the Municipal Utilities that GRE may supply electricity to, and thus may be filing on behalf of them for REC retirements (Essentially, if GRE is compliant than the municipality is compliant is my understanding)?

We are attempting to verify Alpha, Ceylon and Rushmore from the following list (MMUA Attachment to Comments in Docket 23-151).

Thanks,
Andy

Municipal utility (supplier(s))	2021 Customers*	2021 Sales (MWh)*
Ada (WAPA, Xcel)	1,187	18,659
Alvarado (Minnkota G&T via PKM co-op)	191	3,428
Alpha (GRE G&T)	79	1,085
Brewster (MRES via Worthington Municipal Utilities); currently 100% renewable w/RECs from WMU)	267	5,247
Caledonia (Dairyland G&T)	1,678	24,372
Ceylon (GRE G&T)	239	2,402
Dundee (GRE G&T via Federated co-op)	n/a***	n/a***
Eitzen (Dairyland G&T via MiEnergy co-op)	164	2,042
Harmony (Dairyland G&T via MiEnergy co-op)	753	8,232
Kasota (Xcel)	369	3,752
Lanesboro (Dairyland G&T)	633	6,653
Mabel (Dairyland G&T via MiEnergy co-op)	465	4,797
Moose Lake (AEP)	981	33,771
Newfolden (WAPA, Ottertail)	239	3,030
Nielsville (WAPA, Ottertail)	57	448
Peterson (Dairyland G&T via MiEnergy co-op)	148	1,418
Round Lake (GRE G&T via Federated co-op)	276	4,078
Rushford (Dairyland G&T via MiEnergy co-op)	898	13,591
Rushmore (GRE G&T)	210	2,043
Shelly (WAPA, Ottertail)	144	1,948
Spring Grove (Dairyland G&T via MiEnergy co-op)	841	8,393
St. Charles (Dairyland G&T)	1,877	22,746
Whalan (Dairyland G&T via MiEnergy co-op)	841	338
Total	12,537	172,473

Andrew Bahn (he/him/his)
Analyst Coordinator

651-539-1696

mn.gov/commerce

Minnesota Department of Commerce

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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. E999/PR-24-12

Dated this 6th day of **August 2024**

/s/Sharon Ferguson

[illegible]

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Cory	Hetchler	cory.hetchler@connexusenergy.com	CONNEXUS ENERGY	14601 Ramsey Boulevard Ramsey, MN 55303	Electronic Service	No	OFF_SL_24-12_Official
Joe	Hoffman	ja.hoffman@smmpa.org	SMMPA	500 First Ave SW Rochester, MN 55902-3303	Electronic Service	No	OFF_SL_24-12_Official
Casey	Jacobson	cjacobson@bepc.com	Basin Electric Power Cooperative	1717 East Interstate Avenue Bismarck, ND 58501	Electronic Service	No	OFF_SL_24-12_Official
Nathan	Jensen	njensen@otpc.com	Otter Tail Power Company	215 S. Cascade St. Fergus Falls, MN 56537	Electronic Service	No	OFF_SL_24-12_Official
Nate	Jones	njones@hcpd.com	Heartland Consumers Power	PO Box 248 Madison, SD 57042	Electronic Service	No	OFF_SL_24-12_Official
Brian	Krambeer	bkrambeer@mienergy.coop	MiEnergy Cooperative	PO Box 626 31110 Cooperative Way Rushford, MN 55971	Electronic Service	No	OFF_SL_24-12_Official
Sara G	McGrane	smcgrane@felhaber.com	Felhaber Larson	220 S 6th St Ste 2200 Minneapolis, MN 55420	Electronic Service	No	OFF_SL_24-12_Official
David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022093	Electronic Service	No	OFF_SL_24-12_Official
Ben	Nelson	benn@cmpasgroup.org	CMMPA	459 South Grove Street Blue Earth, MN 56013	Electronic Service	No	OFF_SL_24-12_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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_24-12_Official
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_24-12_Official
John	Richards	johnrichards@nweco.com	Northwestern Wisconsin Electric Company	104 S. Pine St. Grantsburg, WI 54840	Electronic Service	No	OFF_SL_24-12_Official
Robert K.	Sahr	bsahr@eastriver.coop	East River Electric Power Cooperative	P.O. Box 227 Madison, SD 57042	Electronic Service	No	OFF_SL_24-12_Official
Harlan	Schmeling	hschmeling@mlwl.us	Moose Lake Water & Light Comm.	P.O. Box 418 Moose Lake, MN 55767	Electronic Service	No	OFF_SL_24-12_Official
Kay	Schraeder	kschraeder@minnkota.com	Minnkota Power	5301 32nd Ave S Grand Forks, ND 58201	Electronic Service	No	OFF_SL_24-12_Official
Christine	Schwartz	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_24-12_Official
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th PI E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_24-12_Official
Trevor	Smith	trevor.smith@avantenergy.com	Avant Energy, Inc.	220 South Sixth Street Suite 1300 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_24-12_Official
Mikayala	Thompson	mmthompson@otpc.com	Otter Tail Power Company	N/A	Electronic Service	No	OFF_SL_24-12_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Carol	Westergard	cwestergard@otpc.com	Otter Tail Power Company	215 S Cascade St Fergus Falls, MN 56537	Electronic Service	No	OFF_SL_24-12_Official