



February 19, 2020

Ryan Barlow, Acting Executive Secretary & General Counsel
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
Saint Paul, MN 55101-2147

Subject: Dakota Electric Association Reply Comments

***In the Matter of Dakota Electric Association's
2019 Integrated Distribution System Plan***

Docket Nos. E-111/CI-18-255 and E-111/M-19-674

Dear Mr. Barlow:

On October 31, 2019, Dakota Electric Association® (Dakota Electric® or Cooperative) filed the Cooperative's inaugural Integrated Distribution Plan (IDP) in Docket No. E-111/M-19-674 in response to filing requirements established by the Minnesota Public Utilities Commission's (Commission or MPUC) February 20, 2019 *Order Adopting Integrated Distribution Plan Filing Requirements* (Order) in Docket No. E-111/CI-18-255.

On December 4, 2019, the Commission issued a *Notice of Comment Period* (Notice) in the above-referenced dockets. This Notice identified the following topics as being open for comment:

- Should the Commission accept or reject Dakota Electric Association's Integrated Distribution Plan (IDP)?
- Does the IDP filed by Dakota Electric Association achieve the planning objectives outlined in the filing requirements approved in the Commission's February 20, 2019 Order?

- What IDP filing requirements provide the most value to the process and why?
- Are there filing requirements that are not informative and/or should be deleted or modified, and why?
- Are there other issues or concerns related to this matter?

On January 27, 2020, Public Comments were filed in this matter by:

- Rakon Energy

On January 29, 2020, Comments in this matter were filed by:

- Minnesota Department of Commerce
- Clean Energy Economy Minnesota

Dakota Electric Reply Comments

Dakota Electric submits these Reply Comments in response to the observations and recommendations submitted as Public Comments and Comments in this docket.

General Perspective

The Commission's December 4 Notice states that the purpose of the Commission's IDP filing requirements is to facilitate a utility's IDP filing that will:

- Maintain and enhance the safety, security, reliability, and resilience of the electricity grid, at fair and reasonable costs, consistent with the state's energy policies;
- Enable greater customer engagement, empowerment, and options for energy services;
- Move toward the creation of efficient, cost-effective, accessible grid platforms for new products, new services, and opportunities for adoption of new distributed technologies;
- Ensure optimized utilization of electricity grid assets and resources to minimize total system costs; and
- Provide the Commission with the information necessary to understand the utility's short-term and long-term distribution-system plans, the costs and benefits of specific investments, and a comprehensive analysis of ratepayer cost and value.

Department of Commerce

The Minnesota Department of Commerce made the following recommendations and request for additional discussion regarding Dakota Electric's Integrated Distribution Plan:

- *Recommendation 1* - The Department recommends that the Commission require Dakota Electric Association to discuss in future filings how the IDP meets the Commission’s Planning Objectives, including:
 - An analysis of how the information presented in the IDP related to each Planning Objective,
 - The location in the IDP,
 - Analysis of efforts taken by the Company to improve upon the fulfillment of the Planning Objectives, and
 - Suggestions as to any refinements to the IDP filing requirements that would enhance Dakota Electric Association’s ability to meet the Planning Objectives.
- *Recommendation 2* - The Department recommends that the Commission amend IDP Requirement 3.D.2 (xi) of Dakota Electric Association’s IDP Requirements to read as follows:
 - “For each grid modernization project in its 5-year Action Plan, require Dakota Electric Association to provide a cost-benefit analysis based on the best information it has at the time and include a discussion of non- quantifiable benefits. Dakota Electric Association shall provide all information to support its analysis.”
- *Recommendation 3* - The Department recommends that the Commission merge IDP Requirement 3.D.1 and 3.D.2 of Dakota Electric Association’s IDP Requirements to read as follows:
 - “Dakota Electric Association shall provide a 5-year Action Plan as part of a 10-year long-term plan for distribution system developments and investments in grid modernization based on internal business plans and considering the insights gained from the DER futures analysis, hosting capacity analysis, and non-wire alternatives analysis. The 5-year Action Plan should include a detailed discussion of the underlying assumptions (including load growth assumptions) and the costs of distribution system investments planned for the next 5-years (expanding on topics and categories listed above). Dakota Electric Association should include specifics of the 5-year Action Plan investments. Topics that should be discussed, as appropriate, include at a minimum:”
- The Department requests that, in Reply Comments, DEA provide a discussion of how DEA maintains and enhances the security and resiliency of the electricity grid.

Dakota Electric offers the following reply to these recommendations and request for additional discussion:

Overall, the comments supplied by the Department, support Dakota Electric’s comments for a need to have more discussions about the IDP questions before the creation of the next IDP report. This discussion could help clarify the use cases for the information requested within the IDP report and help shape the format of the requests that

are included within the next round of IDP reports, to ensure they support the identified use cases. The discussion would also help the utilities and stakeholders come to a common understanding of the terminology used within the requests. Simple terms like “grid modernization project” or “planned project” can be interpreted quite differently by individuals, so it would be helpful to have a common understanding among the parties for these terms.

For the 2019 IDP report, Dakota Electric worked diligently to provide answers to all the questions put forth by the Commission. The responses which were contained within the IDP report were based upon our understanding of the information that was being requested by each of the questions. Dakota Electric did not understand that we were required to extend our answers to ensure that the overall planning objectives of the reporting process were fully explained with this first IDP report. We agree with the Department's comment “that the IDP reporting process is designed to be iterative and will necessarily evolve over time.” Based upon this understanding of the process, Dakota Electric worked to answer the supplied questions as they were presented.

- ***Recommendation 1*** – “*The Department recommends that the Commission require Dakota Electric Association to discuss in future filings how the IDP meets the Commission’s Planning Objectives*”

Dakota Electric does not support the need for implementing the Department Recommendation #1, particularly given the additional amount of work which would be involved. The Department’s recommendation could be viewed as simply adding 5 additional questions to the reporting requirements. One for each of the planning objectives. But, given the broad scope of each of the planning objectives, ensuring that comprehensive answers are provided within the IDP report, would be difficult, especially considering the varied interests of the stakeholders.

Dakota Electric believes it would provide a more consistent reporting outcome among the different utilities to instead include individual questions that are focused on the information requested. These questions would be in support of clearly identified use cases, to ensure each utility answers the same questions and provides similar information. For example, in the 2019 Commission IDP order, there are no questions about distribution system security or resiliency, but from the planning objectives, the Department’s understanding was that specific information about the security and resiliency of the Dakota Electric distribution system should have been part of the IDP report filing. The problem that Dakota Electric faced is what is security in the context of the IDP planning goals. Security could cover many different areas, such as cyber or physical. Instead, if information about security or resiliency would be useful to supply, specific questions about these issues should be crafted and included in the IDP request, so that the information provided by the utilities would be more valuable.

- ***Recommendation 2*** – “*The Department recommends that the Commission amend IDP Requirement 3.D.2 (xi) of Dakota Electric Association’s IDP Requirements ...*”

The 2019 IDP Requirement D, was a very challenging section to answer. To Dakota Electric, this section appeared to assume a robust analysis of each distribution system investment is already being completed. Dakota Electric does not have a specific 10-year or even 5-year action plan for the development of the distribution system. Dakota Electric’s distribution facilities are built in response to our member’s needs. Dakota Electric does have a long-term load forecast which is not location specific, but instead generally forecasts the change in load levels for the future across the Dakota Electric system. Dakota Electric also has a long-term distribution framework which includes potential future connections between the transmission and distribution (substations), but specific time-frames for implementing those potential additions are not finalized until the electric need occurs.

Planning for a distribution system is much different than planning for a transmission system. Transmission systems can use the diversity of the electrical loads and follow the growth trends to drive the planning of new facilities. So precise dates for the installation of a specific piece of the transmission network is not required. Distribution systems must instead quickly react to each new load and be able to meet the total undiversified electrical demands of each new service. The lead time for a new residential development or a new commercial service can be weeks or months not years.

Dakota Electric does not object to the Department recommendation to amend the sub-bullet (xi) with the additional language, but Dakota Electric continues to be concerned that this requirement to include a cost-benefit analysis for each grid modernization project could create a significant additional cost for Dakota Electric and its members. This concern is dependent upon the scope of projects which are considered “grid modernization”. If only major projects such as Dakota Electric’s AGi project or similar significantly large projects are considered a grid modernization project, then it is reasonable and practical for a full cost benefit analysis to be developed. But if a full cost-benefit analysis is required for the normal distribution system updates or additions are required, then the additional response time and labor required would negatively impact service to our members. Discussion about what is considered a grid modernization project would be helpful for Dakota Electric to better understand what is being requested in future IDP reports. If a framework or use cases for cost-benefit analysis were provided, it would support Dakota Electric’s ability to provide information most useful.

- ***Recommendation 3*** - *The Department recommends that the Commission merge IDP Requirement 3.D.1 and 3.D.2 of Dakota Electric Association’s IDP Requirements to read as follows:*

Dakota Electric supports the merging of questions 3.D.1 and 3.D.2. As presently written, they are somewhat redundant. The Department recommendation to merge these is a step forward. However, Dakota Electric is concerned about the

modification of one piece of the language proposed by the Department. In the Commission's order for Dakota Electric's 2019 IDP report, the term "hosting capacity/daytime minimum load data" was used. In the Department recommended language "daytime minimum load data" was removed. Dakota Electric would need to add additional staff and spend a considerable amount to purchase and install hosting capacity analysis software. Significant additional effort would be required to integrate the hosting capacity analysis software with our existing systems and to prepare the engineering model. Dakota Electric hopes that the elimination of the "daytime minimum load data" from the Department recommendation was simply an oversight and a carryover from other utility IDP comments by the Department.

- **Department Request** *"the Department requests that DEA provide a discussion of how DEA maintains and enhances security and resilience of the electricity grid in Reply Comments."*

Within the Department comments, it observed that "the topics of maintaining and enhancing security and resiliency of the electricity grid were minimally referenced or not referenced at all in DEA's IDP". It is important to note the difference between Dakota Electric and the other regulated utilities. Dakota Electric is not vertically integrated as are the other regulated electric utilities and as such does not operate what Dakota Electric considers the majority of the electrical grid. The Dakota Electric distribution system is fully dependent upon others to provide security and resiliency of the overall electric grid. The distribution system does not operate as a network, like the transmission system, and each Dakota Electric distribution substation is an independent connection to the overall electrical grid.

That said, Dakota Electric takes the security of the distribution system very seriously. As described in the IDP report, the Cooperative has real-time SCADA monitoring of all our substations and key electrical components of the distribution system that are located outside of the fenced substations. Dakota Electric also

performs periodic visual inspections of our distribution facilities to identify any compromised equipment, to help ensure safety and reliability. As reported in the IDP, Dakota Electric is implementing the Advanced Grid Infrastructure (AGI) project to enhance our monitoring and identification of problems on the distribution system. This will also help with the security of the distribution system. Dakota Electric has computerized systems which must be protected from cyber intrusions and the Cooperative uses a variety of methods and configurations to protect those systems. Dakota Electric closely guards the methods used to protect the distribution systems and discussion of the methods used to provide security of the computer software systems and the overall distribution system are not appropriate for a publicly available document.

For resilience of the distribution system, Dakota Electric can only control the facilities which we own and maintain. Dakota Electric relies upon the ability of the interconnected transmission grid to supply electricity to our distribution substations. Dakota Electric does not perform generation capacity analysis or transmission operational and planning studies. Dakota Electric relies upon Great River Energy, in partnership with Xcel Energy, to provide a reliable and resilient transmission grid.

Dakota Electric believes there is a very strong and reliable transmission and generation system supplying the distribution system. Great River Energy has been a fantastic partner supporting the Dakota Electric distribution system. This can be seen in the excellent Dakota Electric reliability indices and limited transmission system outage events experienced by the Dakota Electric distribution substations. Our power supplier, Great River Energy coordinates with us during and after storms to ensure reliable delivery of energy and works to resolve any issues that arise. Great River Energy's transmission planning area maintains periodic interaction with the Dakota Electric engineering staff to ensure the electrical grid is ready to meet the current and future electrical needs of our members. Dakota

Electric and Great River Energy coordinate our system plans to ensure the adequacy of the electrical grid.

Dakota Electric's efforts to help maintain the resiliency of the distribution system include installing poles which exceed the strength requirements of the NESC (National Electrical Safety Code). Dakota Electric also maintains a large inventory of spare equipment so that any failed piece of distribution equipment can be quickly replaced. Our crews are trained on how to maintain and replace each type of electrical equipment that Dakota Electric owns and is relied upon to provide energy to our members so that failed equipment can be replaced 24/7. Most importantly, Dakota Electric maintains contingency capacity in adjacent electrical facilities, so those alternative electrical supply paths can be quickly utilized to meet the electric requirements of our members in the event of a failure of electrical distribution equipment.

Clean Energy Economy Minnesota

Clean Energy Economy Minnesota (CEEM) made the following observations and recommendations regarding Dakota Electric's Integrated Distribution Plan:

- “The Commission should accept DEAs Integrated Distribution plan. DEA's inaugural IDP represents a solid foundation for facilitating stakeholder dialogue related to grid modernization. DEA provides an accessible narrative and thought process to engage stakeholders and the Commission as the company invests in foundational grid modernization technologies.”
- “... DEA's approach provides transparency in how the company approaches scenarios. DEA develops DER scenarios based several factors that should also be part of other utilities' IDPs.”
- “DEA's filing presents a solid examination of how the company may consider NWAs going forward. DEA provides various options the company may pursue in NWA's and notes the benefits and potential for a variety of technologies. DEA also provides clear examples of projects and clear problem statements for gathering solutions. This discussion provides a good example for utility IDP filings going forward.”
- “... we encourage the Commission to consider not only compliance with filing requirements, but other outcomes of IDP processes. In particular, there are opportunities to highlight where clean energy delivers significant public benefits, to focus on customer empowerment alongside operational expertise, and to create communities of practice around a modern grid.”

Dakota Electric offers the following reply to these observations and recommendations:

Dakota Electric appreciates these favorable observations by CEEM. Preparing this initial IDP represented a significant investment of time and resources on the part of the Cooperative. It is gratifying to see these efforts recognized.

Dakota Electric is very interested in identifying cost effective non-wired alternative (NWA) solutions. To support this, Dakota Electric is working toward developing individual NWA solutions as tools which can be used by the distribution engineers to solve distribution issues when they are identified. For example, when a portion of the distribution system needs to have better voltage support, due to growing loads, there are four basic traditional solutions. The lowest cost solution is to add capacitors to boost the voltage; the second solution with the next lowest cost is to add voltage regulators to boost the voltage; the third solution with a higher cost is to re-conductor the circuit supplying the area with larger conductor or to install additional circuits into the area; the last and typically the most costly is to install a new distribution substation. Each of these solutions have a cost that, through experience, is easily estimated by the distribution engineer and, depending upon the need, the distribution engineer can quickly identify the solution which provides the most value. Dakota Electric is looking at NWA solutions to add to the distribution engineer's toolbox. For the above example, a potential solution could be to interconnect energy storage devices on the circuit to boost the voltage. This type of energy storage solution is still more costly than the traditional solutions, but it is hoped that as costs are reduced and manufacturers see the business opportunity, these NWA alternative solutions can be utilized. Dakota Electric believes that information exchange among utilities is the key to getting NWA solutions utilized. Being able to learn how other utilities have implemented NWA solutions and then being able to take these proven NWA solutions and adding them to our distribution engineering toolbox will be the fastest way to increase the use of non-traditional solutions.

Rakon Energy

Rakon Energy made the following observations and recommendations regarding Dakota Electric's Integrated Distribution Plan:

- “Rakon Energy appreciates this opportunity to provide comments on Dakota Electric's 2019 Integrated Distribution Plan (IDP). Energy Storage costs assumption is a cause for concern. It is possible to exchange cost information with other Minnesota utilities using an idea like Emerging Technologies Coordinating Council (ETCC). Finally, installing energy storage at water treatment plants or wastewater treatment facilities is a near-term opportunity to give energy storage a chance.”
- “Recent Energy Storage installations at water treatment plants – An opportunity for Dakota Electric to collaborate with Dakota County”

Dakota Electric appreciates Rakon Energy submitting their comments and to offer additional information about energy storage to Dakota Electric. Dakota Electric offers the following reply comments to these observations:

- **“Energy Storage costs assumption is a cause for concern”**
Dakota Electric appreciates this comment provided by Rakon Energy about energy storage costs and we agree there is much to learn about energy storage. The actual costs of energy storage installations are a topic where this is a significant difference of opinion. Since this technology is rapidly changing and costs are variable based upon the use case(s), the location (land costs), and the interconnection costs, comparing the costs of one installation to another has proven difficult. It is important to have an apples-to-apples comparison when evaluating alternatives.

Dakota Electric has learned that the amount of cycling of the battery per day/month/year greatly affects the overall cost of an energy storage system and the expected life of the system. An energy storage system, which is planned to only support emergency backup energy and is only required to be used one or twice per year has a lower cost than an energy storage system which would be required to cycle daily to reduce peak demand. The costs provided by Rakon Energy do not

show the amount of cycling supported by those costs, but the information provided does support the idea that the lower range of the costs presented are assuming a lower cycling rate. Dakota Electric based the costs in the 2019 IDP report upon the recently reported installation costs in national publications. As energy storage costs continue to quickly change, the numbers reported in publications are typically a year old and could easily have changed since those systems were installed. We appreciate the information provided by Rakon Energy and will consider that information in future analysis.

Dakota Electric was glad to see that the information provided by Rakon Energy supported our cost estimates used in the 2019 IDP report, as they fell within the cost ranges provided by Rakon Energy. In the information provided by vendors to Rakon Energy the estimated costs ranged from a low of \$250 to a high of \$2,000 per kwhr. Dakota Electric continues to be very interested in learning more about how energy storage could save costs for our members and how energy storage could be best applied.

- **Rakon Energy recommendation about “implementing battery energy storage at their water and wastewater treatment facilities”**

Dakota Electric agrees that using DER to support and back up the electrical needs for the water supply of the cities in our service territory is a viable option. In fact, Dakota Electric has already worked with many of the cities in our service territory to install DER and to work with them to utilize this generation resource to reduce their electrical costs. The cities of Apple Valley, Burnsville, Eagan and Lakeville have all installed DER systems to their wells and water treatment facilities.

Dakota Electric worked with them to install full capacity DER generation systems to supply their electrical needs during emergencies. The cities are also able to use the same DER generation to reduce their electrical usage during periods of peak electrical demand. This results in significant savings on their monthly electrical bills.

The City of Eagan has installed two DER supported campus micro-grid systems which are able to isolate and operate an entire campus on a DER generation system. One campus system is supporting their water treatment facilities and the other is supporting the government center complex, which includes the city offices, police station, ice arena and water park. When these campus generation installations isolate from the rest of the Dakota Electric distribution system, they utilize Dakota Electric owned and operated wires and transformers as part of the campus micro-grid.

A few of our members have installed campus micro-grids. One of the campus micro-grids installed at a member location even utilizes the Dakota Electric substation bus to supply all the feeders connected to the substation. The result is the entire substation is able to operate in isolation from the transmission grid. These types of micro-grids which utilize utility owned facilities as part of the campus micro-grid are unique to Dakota Electric and the result of close cooperation between Dakota Electric and our members.

All these campus generation installations are remotely controlled and operated by Dakota Electric and are used to supply the total load for each campus during times of peak demand on the electrical grid. This cooperation between our members and Dakota Electric is annually saving millions of dollars in reduced power costs for our members.

Conclusion

In conclusion, as has been stated throughout these comments, the amount of effort required to produce the 2019 IDP report was significant. Having discussions about the questions being included for the next IDP report and being able to interact with the stakeholders about the use cases for the information being requested would greatly support Dakota Electric's ability to provide useful information. Having a consistent and

common understanding of the terms used within the questions may also help reduce the interpretation efforts required to answer the questions.

Dakota Electric appreciates the opportunity to provide these Reply Comments and looks forward to continuing refinement of this, and future, Integrated Distribution Plans.

Sincerely,

/s/ Craig Turner

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Certificate of Service

I, Cherry Jordan, hereby certify that I have this day served copies of the attached document to those on the following service list by e-filing, personal service, or by causing to be placed in the U.S. mail at Farmington, Minnesota.

Docket Nos. *E-111/CI-18-255 and E-111/M-19-674*

Dated this 19th day of February 2020

/s/ Cherry Jordan

Cherry Jordan

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Jared	Hendricks	jared.hendricks@owatonnautilities.com	Owatonna Public Utilities	PO Box 800 208 S Walnut Ave Owatonna, MN 55060-2940	Electronic Service	No	OFF_SL_18-255_Official
Annete	Henkel	mui@mutilityinvestors.org	Minnesota Utility Investors	413 Wacouta Street #230 St. Paul, MN 55101	Electronic Service	No	OFF_SL_18-255_Official
Shane	Henriksen	shane.henriksen@enbridge.com	Enbridge Energy Company, Inc.	1409 Hammond Ave FL 2 Superior, WI 54880	Electronic Service	No	OFF_SL_18-255_Official
Michael	Hoppe	il23@mtn.org	Local Union 23, I.B.E.W.	932 Payne Avenue St. Paul, MN 55130	Electronic Service	No	OFF_SL_18-255_Official
Jan	Hubbard	jan.hubbard@comcast.net		7730 Mississippi Lane Brooklyn Park, MN 55444	Electronic Service	No	OFF_SL_18-255_Official
Ralph	Jacobson	ralphj@ips-solar.com		2126 Roblyn Avenue Saint Paul, Minnesota 55104	Electronic Service	No	OFF_SL_18-255_Official
Casey	Jacobson	cjacobson@becp.com	Basin Electric Power Cooperative	1717 East Interstate Avenue Bismarck, ND 58501	Electronic Service	No	OFF_SL_18-255_Official
John S.	Jaffray	jjaffray@jirpower.com	JJR Power	350 Highway 7 Suite 236 Excelsior, MN 55331	Electronic Service	No	OFF_SL_18-255_Official
Alan	Jenkins	aj@jenkinsatlaw.com	Jenkins at Law	2950 Yellowtail Ave. Marathon, FL 33050	Electronic Service	No	OFF_SL_18-255_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Nate	Jones	njones@hcpd.com	Heartland Consumers Power	PO Box 248 Madison, SD 57042	Electronic Service	No	OFF_SL_18-255_Official
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Mark J.	Kaufman	mkaufman@ibewlocal949.org	IBEW Local Union 949	12908 Nicollet Avenue South Burnsville, MN 55337	Electronic Service	No	OFF_SL_18-255_Official
Jennifer	Kefer	jennifer@dgardiner.com	Alliance for Industrial Efficiency	David Gardiner & Associates, LLC 2609 11th St N Arlington, VA 22201-2825	Paper Service	No	OFF_SL_18-255_Official
Julie	Ketchum	N/A	Waste Management	20520 Keokuk Ave Ste 200 Lakeville, MN 55044	Paper Service	No	OFF_SL_18-255_Official
Ted	Kjos	tkjos@mienergy.coop	MiEnergy Cooperative	31110 Cooperative Way PO Box 626 Rushford, MN 55971	Electronic Service	No	OFF_SL_18-255_Official
Brad	Klein	bklein@elpc.org	Environmental Law & Policy Center	35 E. Wacker Drive, Suite 1600 Suite 1600 Chicago, IL 60601	Electronic Service	No	OFF_SL_18-255_Official
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Chris	Kopel	chris@CMPASgroup.org	Central Minnesota Municipal Power Agency	459 S Grove St Blue Earth, MN 56013-2629	Electronic Service	No	OFF_SL_18-255_Official
Brian	Krambeer	bkrambeer@mienergy.coop	MiEnergy Cooperative	PO Box 626 31110 Cooperative Way Rushford, MN 55971	Electronic Service	No	OFF_SL_18-255_Official
Jon	Kramer	sundialjon@gmail.com	Sundial Solar	3209 W 76th St Edina, MN 55435	Electronic Service	No	OFF_SL_18-255_Official
Michael	Krause	michaelkrause61@yahoo.com	Kandiyo Consulting, LLC	433 S 7th Street Suite 2025 Minneapolis, Minnesota 55415	Electronic Service	No	OFF_SL_18-255_Official
Michael	Krikava	mkrikava@briggs.com	Briggs And Morgan, P.A.	2200 IDS Center 80 S 8th St Minneapolis, MN 55402	Electronic Service	No	OFF_SL_18-255_Official
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Susan	Ludwig	sludwig@mnpower.com	Minnesota Power	30 West Superior Street Duluth, MN 55802	Electronic Service	No	OFF_SL_18-255_Official
Kavita	Maini	kmairi@wi.rr.com	KM Energy Consulting, LLC	961 N Lost Woods Rd Oconomowoc, WI 53066	Electronic Service	No	OFF_SL_18-255_Official
Pam	Marshall	pam@energycents.org	Energy CENTS Coalition	823 7th St E St. Paul, MN 55106	Electronic Service	No	OFF_SL_18-255_Official
Samuel	Mason	smason@beltramelectric.com	Beltrami Electric Cooperative, Inc.	4111 Technology Dr. NW PO Box 488 Bemidji, MN 56619-0488	Electronic Service	No	OFF_SL_18-255_Official
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John	McWilliams	John.McWilliams@DairylandPower.com	Dairyland Power Cooperative	3200 East Ave SPO Box 817 La Crosse, WI 54601-7227	Electronic Service	No	OFF_SL_18-255_Official
Thomas	Melone	Thomas.Melone@AllcoUS.com	Minnesota Go Solar LLC	222 South 9th Street Suite 1600 Minneapolis, Minnesota 55120	Electronic Service	No	OFF_SL_18-255_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Dalene	Monsebroten	dalene.monsebroten@nmpagency.com	Northern Municipal Power Agency	123 2nd St W Thief River Falls, MN 56701	Electronic Service	No	OFF_SL_18-255_Official
Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP	33 South Sixth St Ste 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_18-255_Official
Carl	Nelson	cnelson@mncee.org	Center for Energy and Environment	212 3rd Ave N Ste 560 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_18-255_Official
Ben	Nelson	benn@cmpasgroup.org	CMMPA	459 South Grove Street Blue Earth, MN 56013	Electronic Service	No	OFF_SL_18-255_Official
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David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency	220 South Sixth Street Suite 1300 Minneapolis, Minnesota 55402	Electronic Service	No	OFF_SL_18-255_Official
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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_18-255_Official
David	O'Brien	david.obrien@navigant.com	Navigant Consulting	77 South Bedford St Ste 400 Burlington, MA 01803	Electronic Service	No	OFF_SL_18-255_Official
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Russell	Olson	rolson@hcpd.com	Heartland Consumers Power District	PO Box 248 Madison, SD 570420248	Electronic Service	No	OFF_SL_18-255_Official
Dan	Patry	dpatry@sunedison.com	SunEdison	600 Clipper Drive Belmont, CA 94002	Electronic Service	No	OFF_SL_18-255_Official
Jeffrey C	Paulson	jeff.jcplaw@comcast.net	Paulson Law Office, Ltd.	4445 W 77th Street Suite 224 Edina, MN 55435	Electronic Service	No	OFF_SL_18-255_Official
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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David G.	Prazak	dprazak@otpc.com	Otter Tail Power Company	P.O. Box 496 215 South Cascade Street Fergus Falls, MN 565380496	Electronic Service	No	OFF_SL_18-255_Official
Gregory	Randa	granda@lakecountrypower.com	Lake Country Power	26039 Bear Ridge Drive Cohasset, MN 55721	Electronic Service	No	OFF_SL_18-255_Official
Mark	Rathbun	mrathbun@greenergy.com	Great River Energy	12300 Elm Creek Blvd Maple Grove, MN 55369	Electronic Service	No	OFF_SL_18-255_Official
Michael	Reinertson	michael.reinertson@avanteenergy.com	Avant Energy	220 S. Sixth St. Ste 1300 Minneapolis, Minnesota 55402	Electronic Service	No	OFF_SL_18-255_Official
John C.	Reinhardt	N/A	Laura A. Reinhardt	3552 26th Ave S Minneapolis, MN 55406	Paper Service	No	OFF_SL_18-255_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_18-255_Official
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_18-255_Official
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Bria	Shea	bria.e.shea@xcelenergy.com	Xcel Energy	414 Nicollet Mall Minneapolis, MN 55401	Electronic Service	No	OFF_SL_18-255_Official
Doug	Shoemaker	dougs@charter.net	Minnesota Renewable Energy	2928 5th Ave S Minneapolis, MN 55408	Electronic Service	No	OFF_SL_18-255_Official
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Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.	76 W Kellogg Blvd St. Paul, MN 55102	Electronic Service	No	OFF_SL_18-255_Official
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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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_18-255_Official
Roger	Warehime	roger.warehime@owatonnautilities.com	Owatonna Public Utilities	208 South WalnutPO Box 800 Owatonna, MN 55060	Electronic Service	No	OFF_SL_18-255_Official
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Robyn	Woeste	robynwoeste@alliantenergy.com	Interstate Power and Light Company	200 First St SE Cedar Rapids, IA 52401	Electronic Service	No	OFF_SL_18-255_Official
Thomas J.	Zaremba	TZaremba@wheelerlaw.com	WHEELER, VAN SICKLE & ANDERSON	44 E. Mifflin Street, 10th Floor Madison, WI 53703	Electronic Service	No	OFF_SL_18-255_Official
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Kenneth	Baker	Ken.Baker@walmart.com	Wal-Mart Stores, Inc.	2001 SE 10th St. Bentonville, AR 72716-5530	Electronic Service	No	OFF_SL_19-674_M-19-674
Sara	Baldwin Auck	sarab@irecusa.org	Interstate Renewable Energy Council, Inc.	PO Box 1156 Latham, NY 12110	Electronic Service	No	OFF_SL_19-674_M-19-674
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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LORI	CLOBES	lclobes@mienergy.coop	MiEnergy Cooperative	31110 COOPERATIVE WAY PO BOX 626 RUSHFORD, MN 55971	Electronic Service	No	OFF_SL_19-674_M-19-674
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Kenneth A.	Colburn	kcolburn@symbioticstrategies.com	Symbiotic Strategies, LLC	26 Winton Road Meredith, NH 32535413	Electronic Service	No	OFF_SL_19-674_M-19-674
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1800 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_19-674_M-19-674
George	Crocker	gwillc@nawo.org	North American Water Office	PO Box 174 Lake Elmo, MN 55042	Electronic Service	No	OFF_SL_19-674_M-19-674
Arthur	Crowell	Crowell.arthur@yahoo.com	A Work of Art Solar	14333 Orchard Rd. Minnetonka, MN 55345	Electronic Service	No	OFF_SL_19-674_M-19-674

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Brian	Draxten	bhdraxten@otpc.com	Otter Tail Power Company	P.O. Box 496 215 South Cascade Street Fergus Falls, MN 565380498	Electronic Service	No	OFF_SL_19-674_M-19-674
Kristen	Eide Tollefson	healingsystems69@gmail.c om	R-CURE	28477 N Lake Ave Frontenac, MN 55026-1044	Electronic Service	No	OFF_SL_19-674_M-19-674
Bob	Eleff	bob.eleff@house.mn	Regulated Industries Cmte	100 Rev Dr Martin Luther King Jr Blvd Room 600 St. Paul, MN 55155	Electronic Service	No	OFF_SL_19-674_M-19-674
Betsy	Engelking	betsy@geronimoenergy.co m	Geronimo Energy	7650 Edinborough Way Suite 725 Edina, MN 55435	Electronic Service	No	OFF_SL_19-674_M-19-674
Oncu	Er	oncu.er@avantenergy.com	Avant Energy, Agent for MMPA	220 S. Sixth St. Ste. 1300 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-674_M-19-674

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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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_19-674_M-19-674
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Allen	Gleckner	gleckner@fresh-energy.org	Fresh Energy	408 St. Peter Street Ste 220 Saint Paul, Minnesota 55102	Electronic Service	No	OFF_SL_19-674_M-19-674
Timothy	Gulden	timothy.gulden@yahoo.com	Winona Renewable Energy, LLC	1449 Ridgewood Dr Winona, MN 55987	Electronic Service	No	OFF_SL_19-674_M-19-674
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Annete	Henkel	mui@mutilityinvestors.org	Minnesota Utility Investors	413 Wacouta Street #230 St.Paul, MN 55101	Electronic Service	No	OFF_SL_19-674_M-19-674
Shane	Henriksen	shane.henriksen@enbridge.com	Enbridge Energy Company, Inc.	1409 Hammond Ave FL 2 Superior, WI 54880	Electronic Service	No	OFF_SL_19-674_M-19-674
Michael	Hoppe	il23@mtn.org	Local Union 23, I.B.E.W.	932 Payne Avenue St. Paul, MN 55130	Electronic Service	No	OFF_SL_19-674_M-19-674
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Casey	Jacobson	cjacobson@bepc.com	Basin Electric Power Cooperative	1717 East Interstate Avenue Bismarck, ND 58501	Electronic Service	No	OFF_SL_19-674_M-19-674
Ralph	Jacobson	ralphj@ips-solar.com		2126 Roblyn Avenue Saint Paul, Minnesota 55104	Electronic Service	No	OFF_SL_19-674_M-19-674
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Jennifer	Kefer	jennifer@dgardiner.com	Alliance for Industrial Efficiency	David Gardiner & Associates, LLC 2609 11th St N Arlington, VA 22201-2825	Paper Service	No	OFF_SL_19-674_M-19-674
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Ted	Kjos	tkjos@mienergy.coop	MiEnergy Cooperative	31110 Cooperative Way PO Box 626 Rushford, MN 55971	Electronic Service	No	OFF_SL_19-674_M-19-674
Brad	Klein	bklein@elpc.org	Environmental Law & Policy Center	35 E. Wacker Drive, Suite 1600 Suite 1600 Chicago, IL 60601	Electronic Service	No	OFF_SL_19-674_M-19-674
Thomas	Koehler	TGK@IBEW160.org	Local Union #160, IBEW	2909 Anthony Ln St Anthony Village, MN 55418-3238	Electronic Service	No	OFF_SL_19-674_M-19-674

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Brian	Krambeer	bkrambeer@mienergy.coop	MiEnergy Cooperative	PO Box 626 31110 Cooperative Way Rushford, MN 55971	Electronic Service	No	OFF_SL_19-674_M-19-674
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Matthew	Lacey	mlacey@greenergy.com	Great River Energy	12300 Elm Creek Boulevard Maple Grove, MN 553694718	Electronic Service	No	OFF_SL_19-674_M-19-674
Douglas	Larson	dlarson@dakotaelectric.com	Dakota Electric Association	4300 220th St W Farmington, MN 55024	Electronic Service	No	OFF_SL_19-674_M-19-674
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Benjamin	Lowe	N/A	Alevo USA Inc.	101 S Stratford Rd Ste 210 Winston Salem, NC 27107-4224	Paper Service	No	OFF_SL_19-674_M-19-674
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Kavita	Maini	kmairi@wi.rr.com	KM Energy Consulting, LLC	961 N Lost Woods Rd Oconomowoc, WI 53066	Electronic Service	No	OFF_SL_19-674_M-19-674
Pam	Marshall	pam@energycents.org	Energy CENTS Coalition	823 7th St E St. Paul, MN 55106	Electronic Service	No	OFF_SL_19-674_M-19-674
Samuel	Mason	smason@beltramelectric.com	Beltrami Electric Cooperative, Inc.	4111 Technology Dr. NW PO Box 488 Bemidji, MN 56619-0488	Electronic Service	No	OFF_SL_19-674_M-19-674
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John	McWilliams	John.McWilliams@DairylandPower.com	Dairyland Power Cooperative	3200 East Ave SPO Box 817 La Crosse, WI 54601-7227	Electronic Service	No	OFF_SL_19-674_M-19-674
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Dale	Niezwaag	dniezwaag@bepec.com	Basin Electric Power Cooperative	1717 East Interstate Avenue Bismarck, ND 58503	Electronic Service	No	OFF_SL_19-674_M-19-674
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Rolf	Nordstrom	rnordstrom@gpisd.net	Great Plains Institute	2801 21ST AVE S STE 220 Minneapolis, MN 55407-1229	Electronic Service	No	OFF_SL_19-674_M-19-674

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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David	O'Brien	david.obrien@navigant.com	Navigant Consulting	77 South Bedford St Ste 400 Burlington, MA 01803	Electronic Service	No	OFF_SL_19-674_M-19-674
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Jennifer	Peterson	jjpeterson@mnpower.com	Minnesota Power	30 West Superior Street Duluth, MN 55802	Electronic Service	No	OFF_SL_19-674_M-19-674

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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David G.	Prazak	dprazak@otpc.com	Otter Tail Power Company	P.O. Box 496 215 South Cascade Street Fergus Falls, MN 565380496	Electronic Service	No	OFF_SL_19-674_M-19-674
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Michael	Reinertson	michael.reinertson@avanteenergy.com	Avant Energy	220 S. Sixth St. Ste 1300 Minneapolis, Minnesota 55402	Electronic Service	No	OFF_SL_19-674_M-19-674
John C.	Reinhardt	N/A	Laura A. Reinhardt	3552 26th Ave S Minneapolis, MN 55406	Paper Service	No	OFF_SL_19-674_M-19-674
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_19-674_M-19-674
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_19-674_M-19-674
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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