

September 17, 2025

Sasha Bergman
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
Docket No. E-999/CI-24-352

Dear Ms. Bergman:

Attached are the supplemental comments of the Minnesota Department of Commerce (Department) in the following matter:

**In the Matter of a Commission Investigation into a Fuel Life-Cycle Analysis
Framework for Utility Compliance with Minnesota's Carbon-Free Standard**

The Investigation was initiated by the Minnesota Public Utilities Commission (Commission) on November 7, 2024.

The Department continues to recommend resource eligibility determinations and criteria and standards for the measurement of Carbon-free Standard compliance, and is available to answer any questions the Minnesota Public Utilities Commission may have.

Sincerely,

/s/ Sydnie Lieb, Ph.D.
Assistant Commissioner, Office of Regulatory Analysis

SL/AZ/KB/ad
Attachment



Before the Minnesota Public Utilities Commission

Reply Comments of the Minnesota Department of Commerce

Docket No. E-999/CI-24-352

I. INTRODUCTION

The passage of H.F. 7 created the Carbon-free Standard (CFS) in Minnesota, but left implementation of the law to the Minnesota Public Utilities Commission (Commission). The current proceeding addresses the most technically demanding concepts of the law, including a partial carbon-free compliance determination, as required by Minn. Stat. § 216B.1691, subd. 2d(b).

This proceeding discerns which resources satisfy the requirements for CFS compliance and qualify as carbon-free under applicable standards. The determination of eligibility depends on the methodologies used in lifecycle emissions analysis and the selection of an appropriate baseline scenario for comparison.

Per the ongoing record development in Docket No. E-999/CI-23-151,¹ the Minnesota Department of Commerce (Department) re-examined its positions in Initial Joint Comments and modified its positions in reply comments to align with the Commission's decision. After reviewing reply comments in the current proceeding, the Department submits supplemental comments to address additional concerns raised by commenting parties. However, the Department notes that many of the comments directed at the Department's positions in initial comments are no longer applicable, and therefore the Department focuses its supplemental comments on topics that are still relevant.

II. PROCEDURAL BACKGROUND

The Department outlines the following procedural background that is relevant to the current proceeding.

October 31, 2024	The Commission posted its Round 3 Notice of Comment Period in Docket No. E-999/CI-23-151. ²
November 7, 2024	The Commission issues its November 7, 2024 Order in Docket No. E-999/CI-23-151 Initiating New Docket and Clarifying "Environmental Justice Area." The docket creates the current proceeding. ³

¹ *In the Matter of an Investigation into Implementing Changes to the Renewable Energy Standard and the Newly Created Carbon Free Standard under Minn. Stat. § 216B.1691, Order on Carbon-free Standard – Clarifying use of Credits, Net Market Purchases, and Reporting*, September 16, 2025, Docket No. E-999/CI-23-151, (eDockets) [20259-223083-01](#).

² *In the Matter of an 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*, October 31, 2024, Docket No. E-999/CI-23-151, (eDockets) [202410-211486-01](#).

³ *In the Matter of an Investigation into Implementing Changes to the Renewable Energy Standard and the Newly Created Carbon Free Standard under Minn. Stat. § 216B.1691, Order Initiating a new Docket and Clarifying "Environmental Justice Area,"* November 7, 2024, Docket No. E-999/CI-23-151, (eDockets) [202411-211701-02](#).

The notice outlines competing discussion topics with the Commission's October 31, 2024 Notice of Comment Period in Docket No. E-999/CI-23-151 with regard to net market purchases and additionally bifurcates discussion around the criteria and standards for the measurement of CFS compliance as they relate to full and partial CFS compliance.

January 22, 2025	The Commission posted its Notice of Comment Period (Notice) in the current proceeding. ⁴
January 29, 2025	The Department submits its Round 3 Initial Comments in Docket No. E-999/CI-23-151 and makes several recommendations to discuss certain topics in the current proceeding. ⁵
March 19, 2025	The MPCA ⁶ and the Department ⁷ submitted their Round 3 Reply Comments in Docket No. E-999/CI-23-151. The MPCA supported the Department's interpretation of resource eligibility presented in Table 1 of the Department's CFS Round 3 Initial Comments, ⁸ and the Department submitted a recommendation for the quantification of partial CFS compliance.
June 5, 2025	The MPCA and the Department submitted their Initial Joint Comments in the current docket. ⁹
August 20, 2025	The Department submitted Reply Comments in the current docket. ¹⁰

⁴ *Notice of Comment Period*, January 22, 2025, (eDockets) [20251-214218-01](#), (hereinafter "Notice").

⁵ *In the Matter of an Investigation into Implementing Changes to the Renewable Energy Standard and the Newly Created Carbon Free Standard under Minn. Stat. § 216B.1691*, Minnesota Department of Commerce, Initial Comments, January 29, 2025, Docket No. E-999/CI-23-151, (eDockets) [20251-214567-01](#), (hereinafter "Department CFS Round 3 Initial Comments").

⁶ *In the Matter of an Investigation into Implementing Changes to the Renewable Energy Standard and the Newly Created Carbon Free Standard under Minn. Stat. § 216B.1691*, Minnesota Pollution Control Agency, Reply Comments, March 19, 2025, Docket No. E-999/CI-23-151, (eDockets) [20253-216591-01](#).

⁷ *In the Matter of an Investigation into Implementing Changes to the Renewable Energy Standard and the Newly Created Carbon Free Standard under Minn. Stat. § 216B.1691*, Minnesota Department of Commerce, Reply Comments, March 19, 2025, Docket No. E-999/CI-23-151, (eDockets) [20253-216562-01](#), (hereinafter "Department CFS Round 3 Reply Comments").

⁹ Minnesota Pollution Control Agency and Minnesota Department of Commerce, Initial Comments, June 5, 2025, (eDockets) [20256-219638-01](#), (hereinafter "Initial Joint Comments").

¹⁰ Minnesota Department of Commerce, Reply Comments, August 20, 2025, (eDockets) [20258-222269-02](#), (hereinafter "Department Reply Comments").

Topic(s) open for comment:

- Definitions of the sources of and requirements for a life-cycle analysis when interpreting the statutory definition of “carbon free” for combusted fuel generation resources without carbon capture that are considered carbon free or receiving partial credit consistent with the November 7, 2024 Order.
- Definitions of the sources of and requirements for a fuel to qualify as sustainable and waste biomass.
- The Partnership on Waste and Energy’s recommendations regarding the scope of the instant docket.
- Development of an accounting methodology to consider energy withdrawn from short-, medium-, and long-duration storage assets.
- Calculating partial compliance based on the net annual generation defined as “carbon-free.”
- Calculating partial compliance for fossil fuel generation with carbon capture and sequestration/storage (CCS) by estimating the total direct carbon dioxide emissions per megawatt-hour (MWh) reduced by the CCS, and applying that percentage to the output of the generation resource employing CCS to determine its carbon-free generation.
- Calculating partial compliance for hydrogen co-firing generation by estimating the direct and indirect emissions of the generation resource per MWh with hydrogen cofiring, compared to the carbon dioxide per MWh that would be emitted if the generator burned only natural gas.
- Whether biomass, renewable natural gas, and solid waste should be eligible as fully or partially carbon-free generation resources based on a fuel life-cycle analysis.
- Calculating partial compliance by generators burning waste materials based on a fuel cumulative life-cycle basis considering greenhouse gas benefits relative to alternative waste management methods.
- The definition and calculation of net market purchases.

III. DEPARTMENT ANALYSIS

A. *LEGAL ARGUMENTS AND SYSTEM BOUNDARIES IN FUEL LIFECYCLE ASSESSMENT*

Both CURE¹¹ and the Clean Energy Organizations (CEOs)¹² make several legal arguments regarding the positions taken by the Agencies in Initial Joint Comments. As the Department clearly articulated in its Reply Comments, fuel LCA is statutorily permissible and is preferable to a strict CFS implementation that only determines CFS eligibility at the instant of generation. Rather than repeat the Department’s previous statements again here, it incorporates by references, its previous statements here.¹³

¹¹ CURE, Reply Comments, August 20, 2025, (eDockets) [20258-222281-01](#), at 11-12, (hereinafter “CURE Reply Comments”).

¹² Clean Energy Organizations, Reply Comments, August 20, 2025, (eDockets) [20258-222253-01](#), at 13-16, (hereinafter “CEOs Reply Comments”).

¹³ Department Reply Comments at 8-12.

B. SYSTEM BOUNDARIES IN EMISSIONS ACCOUNTING

Regarding the CEOs' claim that indirect carbon emissions should be quantified for carbon capture and sequestration (CCS) and hydrogen,¹⁴ the Department notes that this request is statutorily no different from fuel LCA. Carbon emissions are either determined at the instant of electricity generation, which makes fossil-fuel derived hydrogen eligible for the CFS, or they are determined over an applicable period of analysis. The Department agrees with the CEOs that indirect emissions should be quantified where appropriate but disagrees that these emissions should be quantified for all resources that do not have an obvious carbon-free status determination. Fuel LCA, as opposed to an engineering analysis, provides a more formalized approach to emissions accounting with required standards of practice, but both exercises achieve the same end goal: to quantify upstream and downstream emissions.

The largest difference between engineering analysis and fuel LCA the Department advocates for is in the use of a counterfactual. In its Reply Comments, the Department stated:

The logic to include baseline avoided emissions within an LCA study is simple. There is a business-as-usual base case where a feedstock is not used to generate electricity. If carbon-free electricity generation were to cease or begin, there is a quantifiable increase or decrease in emissions that result from the change in electricity generation. If the emissions from a fuel LCA study of electricity generation with the feedstock are less than or equal to the emissions of the base case, then the marginal addition of the electricity has either negative emissions or no emissions associated with the electricity generation, and should qualify as carbon-free.¹⁵

Rebound effects are real and relevant to the quantification of carbon emissions. For example, if a waste incinerator shuts down because it cannot be used for CFS compliance, the next logical place for the waste is a landfill, which increases CO₂ emissions. The Commission should not ignore real consequences of its decisions, which is why counterfactuals are necessary. Rebound effects are also why the Department recommends against CFS eligibility for primary biomass. Primary biomass creates market pressure to increase marginal production, which must come from somewhere. The source of new primary biomass could be anywhere in the world, with variable land use changes as benign as restoring idled or degraded agricultural land to clear cutting rainforest, a variability which makes the study overly burdensome to complete due to a multiple attribution problem. Similarly, if there is an economic use for a waste product—rather than to open burn or sequester the waste product—then the reduction of these alternative uses offset by energy production must also be considered. Therefore, only products that are truly waste, that have no current economic value, can reasonably be determined not to lead to rebound effects that require additional study.

¹⁴ CEOs Reply Comments at 18-21.

¹⁵ Department Reply Comments at 14.

Regarding the scope of greenhouse gas quantification, the Central Municipal Power Agency Services (CMPAS) requests clarification from the Department and Minnesota Pollution Control Agency (MPCA) regarding the inclusion of greenhouse gas emissions throughout the Joint Initial Comments. Specifically, CMPAS asked to “clarify whether other types of greenhouse gas (“GHG”) emissions impacts included in any LCA will be converted to carbon dioxide equivalents (“CO₂e”) or remain as separate types of emissions.”¹⁶

The Department provided clarification on the quantification of all relevant greenhouse gases in fuel LCA studies in its reply comments:

First, greenhouse gasses that are not carbon dioxide should qualify for inclusion in fuel LCA studies. While carbon dioxide can act as a fertilizer and causes ocean acidification, the primary purpose of the CFS is to reduce the effects of global warming. All greenhouse gasses should be quantified within a fuel LCA study to determine the total carbon dioxide equivalent emissions because the goal of the CFS is to reduce the effects of global warming.¹⁷ [citations omitted]

C. ENGINEERING ANALYSIS FOR CCS

In Initial Joint Comments, the Agencies stated:

The requirements for mixed generation are greater compared to hydrogen-only generation. Combustion of hydrogen with other fuels needs to have an engineering study to determine the final electricity output derived from hydrogen compared to other input fuels, which may not be equivalent to the energy content of the input fuels. While upstream losses from zero-emission hydrogen do not need to be quantified, the engineering study needs to determine the final electricity output for a potential range of hydrogen co-firing that may result from different percentages of fuel mixtures based on potential operational restrictions, up to a zero-hydrogen fuel mix.¹⁸

Xcel disagrees with the Department’s recommendation to require an engineering study to determine the final electricity output derived from hydrogen compared to other input fuels.

Regarding the Agencies’ recommendation to require engineering studies to affirm heat rates (MMBtu per MWh), we again state that the amount of CF generation that can be applied towards CFS compliance should be determined on a fuel-by-fuel basis and does not need to be determined

¹⁶ Central Municipal Power Agency/Services, Reply Comments, August 20, 2025, (eDockets) [20258-222276-01](#) at 5.

¹⁷ Department Reply Comments at 13-14.

¹⁸ Initial Joint Comments at 17.

comparative to other fuel resources simultaneously being combusted. Engineering studies should not be required.¹⁹

The Department points to two examples that demonstrate why Xcel's recommendation is problematic. First, the US Energy Information Administration (EIA) publishes data on heat rates of different power generation technologies based on fuel source. The difference in heat rates for 2023 is shown in Table 1.

Table 1:
Comparison of Heat Rates (Btu / kWh) by Fuel Source and Generation Technology for
EIA Test Year 2023

Prime Mover	Coal	Petroleum	Natural Gas	Nuclear
Steam Generator	10,020	10,314	10,285	10,452
Gas Turbine	--	13,088	11,010	--
Internal Combustion	--	10,506	8,900	--
Combined Cycle	--	9,696	7,549	--

Source: EIA²⁰

The difference in heat rate between the most efficient steam generation, which uses coal, and the least efficient steam generation, which uses nuclear is 568 Btu / kWh, which is a 5.6 percent difference. Much larger differences are observed for gas turbines and combined cycle turbines between petroleum and natural gas. While hydrogen is much more similar to natural gas than any other fuel, the differences in energy density and volume mean that the same operational characteristics should not be assumed.

Furthermore, Harper et al. (2025) predicts over a 2 percent difference in heat rate between a 0 – 100 percent hydrogen co-fire, which uses experimental results from a 38.8 percent hydrogen co-fire by volume.²¹ While a 2 percent difference is not highly significant, the estimated variation is only prediction based on the energy content of hydrogen. The 38.8 percent hydrogen by volume tested in Harper et al. (2025) is equivalent to approximately 18 percent hydrogen by energy content, due to the lower energy density of hydrogen compared to natural gas by volume.²² This very recent study does not identify any real-world experimental results that test hydrogen contents that are significantly higher than its own experiments, and thus there remains significant uncertainty about hydrogen

¹⁹ *In the Matter of a Commission Investigation into a Fuel Life-Cycle Analysis Framework for Utility Compliance with Minnesota's Carbon-Free Standard*, Xcel Energy, Reply Comments, August 20, 2025, (eDockets) [20258-222259-01](#) at 5 (hereinafter "Xcel Reply Comments").

²⁰ US Energy Information Administration. Table 8.2. *Average Tested Heat Rates by Prime Mover and Energy Source, 2013 – 2023*. (2024). Available at: https://www.eia.gov/electricity/annual/html/epa_08_02.html

²¹ See figure 20. Results are extrapolated based on experimental results. Harper, J., Gibeaut, D., Lozier, M., Sake, R., Wolf, T., & Noble, D. R. (2025). Hydrogen Cofiring Demonstration at Constellation Hillabee Siemens Energy SGT6-6000G Power Plant. *Journal of Engineering for Gas Turbines and Power*, 147(5), 051025.

²² See figure 4. Goldmeer, Jeffrey. *Power to Gas: Hydrogen for Power Generation*. General Electric Company, (February 2019). Available at: https://www.gevernova.com/content/dam/gepower/global/en_US/documents/fuel-flexibility/GEA33861-Power-to-Gas-Hydrogen-for-Power-Generation.pdf

performance at significantly higher energy contents. To the Department's knowledge, there are no commercially available turbines capable of combusting 100 percent hydrogen. The absence of such examples demonstrates that significant engineering challenges remain with the combustion of 100 percent hydrogen. These challenges may alter performance characteristics of hydrogen co-firing such that a simple energy input calculation is not sufficient.

D. TEMPLATE/ATTACHMENT A

Both CURE and Xcel make comments regarding the Agencies' recommendation to fill out a template. Xcel states:

"Xcel Energy appreciates the effort that the Agencies are making to streamline the comment process. The example template that the Agencies included with their positions proved helpful for completing the template, however no specific directions were included."²³

The Department acknowledges Xcel's statement and agrees that further instructions would have been helpful to fill out the template. The intended result to use the template is:

To ensure that each commenting party addresses each of the main concerns with resource eligibility in this proceeding, the Agencies request that all commenting parties fill out the template, which is included as Attachment A. The template ensures each of the main subjects open for comment is addressed and will help summarize complex positions for each resource.²⁴

Due to the complex set of resource eligibility concerns and related topics in lifecycle assessment, the normative exercise of filling out the template requires each intervenor to examine whether each relevant concern is sufficiently addressed by the intervenor's comments. It was therefore surprising to read CURE's comments, which state:

Furthermore, asking all commenting parties to fill out a ballot, as the agencies do in their initial comment, appears to conflate the application of law and science with a political process. While the Commission staff must make some sense of the comments in this docket, it is hardly the case that voting among commenting stakeholders is a valid way to make a decision on what a law means. CURE encourages the agencies and all commenters to instead focus on the actual legal and policy arguments in this case without creating a false sense of order through voting.²⁵ [citations omitted]

²³ Xcel Reply Comments at 7.

²⁴ Initial Joint Comments at 8.

²⁵ CURE Reply Comments at 12.

The Agencies never implied, nor stated that CFS eligibility should be determined by vote, nor did the Agencies provide a ballot to fill out. Attachment A to the Agencies' Initial Joint Comments is titled "Template Summary of Positions," and in no way implies that the template is a ballot.

E. MODIFICATIONS AND CLARIFICATIONS OF REPLY COMMENTS

E.1. Modification of Recommendation B.4

After discussions with stakeholders, the Department discovered that its Recommendation B.4 requires modification. Recommendation B.4 states:

B.4. The Department recommends the Commission order the following requirements for the re-evaluation of lifecycle emissions studies:

- A. For existing assets, lifecycle emissions shall be evaluated no sooner than every five years; and
- B. For new capital projects, lifecycle emissions shall be evaluated no sooner than after the capital project is fully depreciated.²⁶

Utility depreciation is a continuous process, and an operating asset may never achieve full depreciation status. The Department's intent with this recommendation is to provide regulatory certainty for assets that are determined to be carbon-free until costs of the asset have been recovered by ratepayers. The Department does not want a carbon-free resource to later be stripped of its carbon-free status before the asset has been paid off, such that ratepayers must fund new generation to replace the now CFS-ineligible asset and therefore increase ratepayer costs. The Department modifies Recommendation B.4 as follows:

B.4. The Department recommends the Commission order the following requirements for the re-evaluation of lifecycle emissions studies:

- A. For existing assets, lifecycle emissions shall be evaluated no sooner than every five years; and***
- B. For new capital projects, lifecycle emissions shall be evaluated ~~after the initial capital expenditure is expected to be paid off, to be determined at the time of CFS eligibility. no sooner than after the capital project is fully depreciated.~~***

With this modification, the Department expects that an initial payoff period will be estimated when the resource is determined to be carbon-free, which is decoupled from actual depreciation schedules. This process will designate a date, at which time the CFS eligibility of the resource must be reaffirmed by a new fuel lifecycle analysis study.

²⁶ Department Reply Comments at 16.

E.2. Recission of Recommendation B.5

After discussions with stakeholders, the Department discovered that its Recommendation B.4 should be rescinded. Recommendation B.5 states:

B.5. The Department recommends the Commission order the following requirements for the fuel source of any resource subject to lifecycle analysis requirements:

A. Utilities must report the composition of the fuel mix compared to the modeled lifecycle analysis in the annual CFS compliance filing; and

B. If any fuel mix deviates by more than ten percent, the utility must submit a new or revised lifecycle analysis and issue a new carbon-free percentage, if applicable.²⁷

This recommendation pertains to the avoided emissions partial compliance structure that the Department rescinded in its reply comments. The fuel mix is relevant for resources that are assigned partial CFS compliance because other resources that are partially compliant will impact the overall emissions if the resource mix changes. With the requirement for only fully carbon-free resources in a co-fire, there is no need to track the fuel mix explicitly, because the carbon-free percentage is explicitly known. The Department rescinds Recommendation B.5.

E.3. Modification of Recommendation J.1

After discussions with stakeholders, the Department discovered that its Recommendation B.4 requires modification. Recommendation J.1 states:

J.1. The Department recommends the Commission order the following requirements for net market purchases:

A. Net market purchases are defined as total retail electric sales minus electricity generation, minus specified electric purchases. Net market purchases only occur when electricity generation and specified electric purchases are lower than total retail electric sales; and

B. The whole MISO territory fuel mix for compliance calculations.²⁸

The Department's formula does not cover the full range of contractual types available, and thus leads to an overestimation of market exposure. Such contracts not covered by the Department's recommendation include purchases of unspecified energy that may have different generation sources over time. It does not matter whether these contracts include any EACs, because net market purchases

²⁷ *Id.*

²⁸ *Id.*, at 17.

are intended to provide for compliance credit for energy purchases from MISO that are not under contract, which is different from CFS-eligible energy. “Specified electric purchases” too narrowly focuses on contracts for power from specific power plants. The Department modifies its recommendation J.1 as follows:

J.1. The Department recommends the Commission order the following requirements for net market purchases:

- A. Net market purchases are defined as total retail electric sales minus electricity generation, minus contracted specified electric purchases. Net market purchases only occur when electricity generation and contracted specified electric purchases are lower than total retail electric sales; and***
- B. The whole MISO territory fuel mix for compliance calculations.***

IV. DEPARTMENT RECOMMENDATIONS

Based on the Department’s analysis and the information in the record, the Department has prepared recommendations, which are provided below and in Appendix A. The recommendations correspond to the subheadings of Section III above, and additional recommendations are included in Appendix A.

The Department notes that Recommendation B.5 was rescinded, and replaced by the subsequent recommendation, which was not numbered in the Department’s reply comments.

B. GENERAL CRITERIA AND STANDARDS FOR PARTIAL COMPLIANCE

- B.1. The Department recommends the Commission order:
 - A. All claims of carbon-free electricity used in a lifecycle analysis must include hourly matching for CFS-eligible generation sources;
 - B. The utility must specify the source of carbon-free electricity; and
 - C. If a utility does not propose carbon-free electricity, the utility should use the whole MISO territory annual grid emissions.
- B.2. The Department recommends the Commission order for all electricity generation processes subject to lifecycle analysis requirements in which the primary electricity input energy is greater than 25 percent of output energy:
 - A. The utility must submit annual documentation with its CFS compliance filing to demonstrate hourly matching of carbon-free electricity generation; and
 - B. The utility must plan new carbon-free resources to match all new electricity generation.
- B.4. The Department recommends the Commission order the following requirements for the re-evaluation of lifecycle emissions studies:
 - A. For existing assets, lifecycle emissions shall be evaluated no sooner than every five years; and
 - B. For new capital projects, lifecycle emissions shall be evaluated after the initial capital expenditure is expected to be paid off, to be determined at the time of CFS eligibility.

- B.5. The Department recommends the Commission order:
 - A. EACs be issued equivalent to metered generation on a per MWh basis;
 - B. A single REC be issued for all generation that may be retired to demonstrate both EETS and CFS compliance;
 - C. A carbon-free allocator, which defines the percentage of CFS eligible generation, must be used for any generation facility that is partially CFS compliant; and
 - D. For all generation made in a CFS partial compliant facility that is not eligible for the EETS, metered generation in A. shall be multiplied by C. to determine the whole number of AECs to issue that are only eligible for the CFS.
- B.6. The Department recommends the Commission order all relevant greenhouse gasses be quantified in fuel LCA studies.
- B.7. The Department recommends the Commission order the biogenic emission carbon cycle to be included for all relevant LCA studies.
- B.8. The Department recommends the Commission order utilities to develop their own avoided emissions base case scenarios, as appropriate, to use in a fuel LCA study.

D. DEFINITIONS OF THE SOURCES OF AND REQUIREMENTS FOR A FUEL TO QUALIFY AS SUSTAINABLE AND WASTE BIOMASS.

- D.1. The Department recommends the Commission establish a working group to determine the standards necessary to verify that waste biomass qualifies and ensures compliance under the definition established by the Commission.

E. DEVELOPMENT OF AN ACCOUNTING METHODOLOGY TO CONSIDER ENERGY WITHDRAWN FROM SHORT-, MEDIUM-, AND LONG-DURATION STORAGE ASSETS.

- E.1. The Department recommends the Commission order energy storage assets be treated as load for CFS compliance purposes, unless storage assets are used to substantiate hourly matching requirements. In order to qualify storage assets for CFS eligibility, the asset must:
 - A. Retire hourly EACs to match charging from fully CFS-eligible resources; and
 - B. Generate hourly EACs to match discharging.

G. CALCULATING PARTIAL COMPLIANCE FOR HYDROGEN CO-FIRING GENERATION BY ESTIMATING THE DIRECT AND INDIRECT EMISSIONS OF THE GENERATION RESOURCE PER MWH WITH HYDROGEN COFIRING, COMPARED TO THE CARBON DIOXIDE PER MWH THAT WOULD BE EMITTED IF THE GENERATOR BURNED ONLY NATURAL GAS.

- None

J. *THE DEFINITION AND CALCULATION OF NET MARKET PURCHASES.*

- J.1. The Department recommends the Commission order the following requirements for net market purchases:
 - C. Net market purchases are defined as total retail electric sales minus electricity generation, minus contracted electric purchases. Net market purchases only occur when electricity generation and contracted electric purchases are lower than total retail electric sales; and
 - D. The whole MISO territory fuel mix for compliance calculations.
- J.2. The Department recommends the Commission adopt the following list of resources to be eligible as carbon-free for net market purchase compliance:
 - Wind
 - Solar
 - Hydropower (with a nameplate capacity of 100 MW or greater, if built before February 8, 2023)
 - Geothermal
 - Nuclear

Attachments

Technology / Feedstock	Definition	Eligible for CFS Compliance? (Y/N/Other)	Requires an LCA Study?	Method of GHG Quantification (Specify Model or Generic Method)	LCA Study Period (Yrs)
CCS (All)	Fossil fuel generation from any source, coupled with carbon capture, sequestration, and storage.	Yes	No	Output MWh & CO ₂ captured (as measured)	N/A
Primary Biomass	Biomass that is intentionally cultivated, harvested, and prepared for use, in whole or in part, as a fuel for the generation of electricity. As farm-grown closed-loop biomass as defined in Minn. Stat. § 216B.2424 subd. 1(a)(1).	No	N/A	N/A	N/A
Waste Biomass	Biomass derived from secondary activities including but not limited to: <ul style="list-style-type: none"> wood waste from storm damage, disease or infestation, utility line maintenance, waste from forest products manufacturing, agricultural activities including manure food waste and other organic waste. 	Yes	Yes	Argonne GREET, EPA WARM & LandGEM, and other models as approved by the Commission.	At least 100 years to account for new biogenic growth and emission tails of decaying debris.
Waste to Energy	Energy derived from solid waste as defined by Minn. Stat. § 116.06 subd. 22.	Yes	Yes	Argonne GREET, EPA WARM & LandGEM, and other models as approved by the Commission.	At least 100 years to account for emission tails of waste decaying in landfills.
Geothermal	Electricity derived from heat below earth's surface.	Yes	No	N/A	N/A
Nuclear	Electricity derived from nuclear fission.	Yes	No	N/A	N/A
Green or Pink	Hydrogen generated from wind, solar, hydropower, geothermal, or nuclear energy.	Yes: With EACs from incremental	No	N/A	N/A

Hydrogen Production	<u>This section does not include electricity generation.</u>	generation in an IRP / procurement decision			
White Hydrogen Production	Geologically mined hydrogen. <u>This section does not include electricity generation.</u>	Yes	No	N/A	N/A
All Other Hydrogen Production	Any hydrogen that uses a primary emitting fuel source, including non-incremental sourced energy and unspecified grid electricity. <u>This section does not include electricity generation.</u>	No	N/A	N/A	N/A
Hydrogen-Only Generation With Green, Pink or White Hydrogen	Electricity derived from combustion or a fuel cell, where hydrogen, or any of its derivatives, are the only fuel source used for electricity generation and where the fuel source is green, pink, or white hydrogen.	Yes	No	N/A	N/A
Hydrogen-Only Generation With Partially Emitting Hydrogen	Electricity derived from combustion or a fuel cell, where hydrogen, or any of its derivatives, are the only fuel source used for electricity generation and where the fuel source is partially-emitting hydrogen.	No	No	N/A	N/A
Co-Firing With Fully Carbon-free Resource	Mixed combustion with at least 2 fuels, one of which is fully-carbon-free.	Yes	No	Engineering analysis of percent of output electricity that is carbon-free.	N/A
Co-Firing With Partially	Mixed combustion with at least 2 fuels, at least one of which is partially-carbon-free.	No	No	N/A	N/A

Carbon-free Resource					
Energy Storage	Includes all technologies that store electricity generation to discharge at a later time.	Other: When coupled with a carbon-free resource and hourly matching.	No	N/A	N/A
Net Market Purchases	Net Market Purchases = Total Retail Electric Sales – Electricity Generation – Contracted Electric Purchases	Yes	No	N/A	N/A

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
Supplemental Comments**

Docket No. E999/CI-24-352

Dated this 17th day of September 2025

/s/Sharon Ferguson

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
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3	Jared	Alholinna	jalholinna@greenergy.com	Great River Energy		12300 Elm Creek Boulevard Maple Grove MN, 55369 United States	Electronic Service		No	24-352Official
4	Michael	Allen	michael.allen@allenergysolar.com	All Energy Solar		721 W 26th st Suite 211 Minneapolis MN, 55405 United States	Electronic Service		No	24-352Official
5	Gary	Ambach	gambach@slipstreaminc.org	Slipstream, Inc.		8973 SW Village Loop Chanhassen MN, 55317 United States	Electronic Service		No	24-352Official
6	Jay	Anderson	jaya@cmpas.org	CMPAS		7550 Corporate Way Suite 100 Eden Prairie MN, 55344 United States	Electronic Service		No	24-352Official
7	Keith	Anderson	keith.anderson@shakopeedakota.org	Shakopee Mdewakanton Sioux Community		Shakopee Mdewakanton Sioux Community 2330 Sioux Trail NW Prior Lake MN, 55372 United States	Electronic Service		No	24-352Official
8	Maria	Anderson	manderson@eastriver.coop	East River Electric Power Cooperative, Inc.		P.O. Box 227 211 S. Harth Ave. Madison SD, 57042 United States	Electronic Service		No	24-352Official
9	Susan	Arntz	saarntz@mankatomm.gov	City Of Mankato		P.O. Box 3368 Mankato MN, 56002-3368 United States	Electronic Service		No	24-352Official
10	Mara	Ascheman	mara.k.ascheman@xcelenergy.com	Xcel Energy		414 Nicollet Mall Fl 5 Minneapolis MN, 55401 United States	Electronic Service		No	24-352Official
11	Ray	Auginaush, Sr.	ray.auginaush@whiteearth-nsn.gov	White Earth Nation		White Earth Tribal Headquarters 35500 Eagle View Road Ogeema MN, 56569 United States	Electronic Service		No	24-352Official
12	John	Aune	johna@bluehorizonsolar.com	Blue Horizon Energy		171 Cheshire Ln Ste 500 Plymouth MN, 55441 United States	Electronic Service		No	24-352Official
13	Mark	Bakk	mbakk@lcp.coop	Lake Country Power		26039 Bear Ridge Drive Cohasset MN,	Electronic Service		No	24-352Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						55721 United States				
14	Jessica L	Bayles	jessica.bayles@stoel.com	Stoel Rives LLP		1150 18th St NW Ste 325 Washington DC, 20036 United States	Electronic Service		No	24-352Official
15	Daniel	Becchetti	dbecchetti@grenergy.com	Great River Energy		12300 Elm Creek Boulevard Maple Grove MN, 55369 United States	Electronic Service		No	24-352Official
16	Todd	Beck	tbeck@grenergy.com			null null, null United States	Electronic Service		No	24-352Official
17	Brian	Bell	bell.brian@dorsey.com	Dorsey & Whitney LLP		50 South Sixth St. Suite 1500 Minneapolis MN, 55402 United States	Electronic Service		No	24-352Official
18	Amadeo	Bellino	amadeo.bellino@whiteearth-nsn.gov	White Earth Nation		White Earth Tribal Headquarters 35500 Eagle View Road Ogema MN, 56569 United States	Electronic Service		No	24-352Official
19	David	Bender	dbender@earthjustice.org	Earthjustice		1001 G Street NW Suite 1000 Washington DC, 20001 United States	Electronic Service		No	24-352Official
20	Melanie	Benjamin	melanie.benjamin@millelacsband.com			43408 Oodena Drive Onamia MN, 56359 United States	Electronic Service		No	24-352Official
21	Sasha	Bergman	sasha.bergman@state.mn.us		Public Utilities Commission		Electronic Service		No	24-352Official
22	Derek	Bertsch	derek.bertsch@mrenergy.com	Missouri River Energy Services		3724 West Avera Drive PO Box 88920 Sioux Falls SD, 57109- 8920 United States	Electronic Service		No	24-352Official
23	Laura	Bishop	laura.bishop@state.mn.us		Minnesota Pollution Control Agency	520 Lafayette Rd Saint Paul MN, 55155 United States	Electronic Service		No	24-352Official
24	William	Black	bblack@mmua.org	MMUA		Suite 200 3131 Fernbrook Lane North Plymouth MN, 55447 United States	Electronic Service		No	24-352Official
25	Hunter	Boldt	hunterboldt@redlakenation.org	Red Lake Nation		15484 Migizi Drive Red Lake MN, 56671 United States	Electronic Service		No	24-352Official
26	Peter	Boney	pboney@boisforte-nsn.gov	Bois Forte Band of Chippewa		Bois Forte Tribal Government 5344 Lakeshore Drive Nett Lake MN, 55772 United States	Electronic Service		No	24-352Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
27	Jerry	Bormann	jbormann@mpsutility.com	Moorhead Public Service Commission (E)		500 Center Ave PO Box 779 Moorhead MN, 56561-0779 United States	Electronic Service		No	24-352Official
28	Sheldon	Boyd	sheldon.boyd@millelacsband.com	Mille Lacs Band of Ojibwe		43408 Oodena Drive Onamia MN, 56359 United States	Electronic Service		No	24-352Official
29	Jon	Brekke	jbrekke@grenergy.com	Great River Energy		12300 Elm Creek Boulevard Maple Grove MN, 55369-4718 United States	Electronic Service		No	24-352Official
30	Mark B.	Bring	mbring@otpco.com	Otter Tail Power Company		215 South Cascade Street PO Box 496 Fergus Falls MN, 56538-0496 United States	Electronic Service		No	24-352Official
31	Matthew	Brodin	mbrodin@allete.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	24-352Official
32	B. Andrew	Brown	brown.andrew@dorsey.com	Dorsey & Whitney LLP		Suite 1500 50 South Sixth Street Minneapolis MN, 55402-1498 United States	Electronic Service		No	24-352Official
33	Danny	Brown	dbrown@eastriver.coop	East River Electric Power Cooperative, Inc.		P.O. Box 227 211 S. Harth Ave. Madison SD, 57042 United States	Electronic Service		No	24-352Official
34	Marvin Ray	Bruneau	marvin.bruneau@millelacsband.com	Mille Lacs Band of Ojibwe		43408 Oodena Drive Onamia MN, 56359 United States	Electronic Service		No	24-352Official
35	Christina	Brusven	cbrusven@fredlaw.com	Fredrikson Byron		60 S 6th St Ste 1500 Minneapolis MN, 55402-4400 United States	Electronic Service		No	24-352Official
36	Scott	Buchanan	scottbuchanan@fdlrez.com	Fond du Lac Band of Lake Superior Chippewa		1720 Big Lake Road Cloquet MN, 55720 United States	Electronic Service		No	24-352Official
37	Shelley	Buck	shelley.buck@piic.org	Prairie Island Indian Community		Prairie Island Indian Community 5636 Sturgeon Lake Road Welch MN, 55089 United States	Electronic Service		No	24-352Official
38	John	Bucknell		Virtus Solis Technologies, Inc.		1511 Pebble Point Drive Troy MI, 48085 United States	Paper Service		No	24-352Official
39	Robert	Budreau	robert.budreau@llojibwe.net	Leech Lake Band of Ojibwe		190 Sailstar Drive NW Cass Lake	Electronic Service		No	24-352Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						MN, 56633 United States				
40	Mike	Bull	mike.bull@state.mn.us		Public Utilities Commission	121 7th Place East, Suite 350 St. Paul MN, 55101 United States	Electronic Service	Yes	24-352Official	
41	Brian	Burandt	brian.burandt@connexusenergy.com	Connexus Energy		14601 Ramsey Blvd Ramsey MN, 55303 United States	Electronic Service	No	24-352Official	
42	Jessica	Burdette	jessica.burdette@state.mn.us		Department of Commerce	85 7th Place East Suite 500 St. Paul MN, 55101 United States	Electronic Service	No	24-352Official	
43	Richard	Burud	rgburud@msn.com	Southern Minnesota Energy Cooperative		31110 Cooperative Way Rushford MN, 55971 United States	Electronic Service	No	24-352Official	
44	Jennifer	Cady	jjcady@mnpower.com	Minnesota Power		30 W Superior St Duluth MN, 55802 United States	Electronic Service	No	24-352Official	
45	James	Canaday	james.canaday@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	Suite 1400 445 Minnesota St. St. Paul MN, 55101 United States	Electronic Service	Yes	24-352Official	
46	Thomas	Carlson	thomas.carlson@edf-re.com	EDF Renewable Energy		10 2nd St NE Ste. 400 Minneapolis MN, 55413 United States	Electronic Service	No	24-352Official	
47	Douglas M.	Carnival	dcarnival@carnivalberns.com	McGrann Shea Carnival Straughn & Lamb		800 Nicollet Mall Ste 2600 Minneapolis MN, 55402-7035 United States	Electronic Service	No	24-352Official	
48	Pat	Carruth	pat@mnvalleyrec.com	Minnesota Valley Coop. Light & Power Assn.		501 S 1st St. PO Box 248 Montevideo MN, 56265 United States	Electronic Service	No	24-352Official	
49	Cathy	Chavers	cchavers@boisforte-nsn.gov	Bois Forte Band of Chippewa		Bois Forte Tribal Government 5344 Lakeshore Drive Nett Lake MN, 55772 United States	Electronic Service	No	24-352Official	
50	Marc	Child	mchild@grenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service	No	24-352Official	
51	Michael	Childs, Jr.	michael.childsjr@piic.org	Prairie Island Indian Community		Prairie Island Indian Community 5636 Sturgeon Lake Road Welch MN, 55089 United States	Electronic Service	No	24-352Official	
52	Ray	Choquette	rchoquette@agp.com	Ag Processing Inc.		12700 West Dodge Road PO Box 2047	Electronic Service	No	24-352Official	

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						Omaha NE, 68103-2047 United States				
53	Steve W.	Chriss	stephen.chriss@walmart.com	Wal-Mart		2001 SE 10th St. Bentonville AR, 72716- 5530 United States	Electronic Service		No	24- 352Official
54	John	Coffman	john@johncoffman.net	AARP		871 Tuxedo Blvd. St, Louis MO, 63119-2044 United States	Electronic Service		No	24- 352Official
55	Kenneth A.	Colburn	kcolburn@symbioticstrategies.com	Symbiotic Strategies, LLC		26 Winton Road Meredith NH, 32535413 United States	Electronic Service		No	24- 352Official
56	Generic	Commerce Attorneys	commerce.attorneys@ag.state.mn.us		Office of the Attorney General - Department of Commerce	445 Minnesota Street Suite 1400 St. Paul MN, 55101 United States	Electronic Service		Yes	24- 352Official
57	Jean	Comstock	jean.comstock.dbcc@gmail.com	St. Paul 350		729 6th St E St. Paul MN, 55106 United States	Electronic Service		No	24- 352Official
58	Hillary	Creurer	hcreurer@allete.com	Minnesota Power		30 W Superior St Duluth MN, 55802 United States	Electronic Service		No	24- 352Official
59	George	Crocker	gwillc@nawo.org	North American Water Office		5093 Keats Avenue Lake Elmo MN, 55042 United States	Electronic Service		No	24- 352Official
60	Rebecca	Crooks Stratton	rebecca.crooks- stratton@shakopeedakota.org	Shakopee Mdewakanton Sioux Community		Shakopee Mdewakanton Sioux Community 2330 Sioux Trail NW Prior Lake MN, 55372 United States	Electronic Service		No	24- 352Official
61	Brooke	Cunningham	health.review@state.mn.us	Minnesota Department of Health		PO Box 64975 St. Paul MN, 55164-0975 United States	Electronic Service		No	24- 352Official
62	Stacy	Dahl	sdahl@minnkota.com	Minnkota Power Cooperative, Inc.		5301 32nd Ave S Grand Forks ND, 58201 United States	Electronic Service		No	24- 352Official
63	Michael	Daley	mdaley@carbonsolutionsgroup.com	Carbon Solutions Group LLC		2045 W Grand Ave. Ste B PMB #58751 Chicago IL, 60612 United States	Electronic Service		No	24- 352Official
64	George	Damian	gdamian@cleanenergyeconomymn.org	Clean Energy Economy MN		13713 Washburn Ave S Burnsville MN, 55337 United States	Electronic Service		No	24- 352Official
65	Lorene	Damsits	lorened@cmpasgroup.org	Central MN MPA		459 S Grove St Blue Earth MN, 56013 United States	Electronic Service		No	24- 352Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
66	Lisa	Daniels	lisadaniels@windustry.org	Windustry		201 Ridgewood Ave Minneapolis MN, 55403 United States	Electronic Service		No	24-352Official
67	Miyah	Danielson	miyahdanielson@fdlrez.com	Fond du Lac Band of Lake Superior Chippewa		1720 Big Lake Road Cloquet MN, 55720 United States	Electronic Service		No	24-352Official
68	Chris	Davis	christopher.davis@state.mn.us		Department of Commerce	Suite 280 85 Seventh Place East St. Paul MN, 55101-2198 United States	Electronic Service		No	24-352Official
69	Jason	Decker	jason.decker@llojibwe.net	Leech Lake Band of Ojibwe		190 Sailstar Drive NW Cass Lake MN, 56633 United States	Electronic Service		No	24-352Official
70	James	Denniston	james.r.denniston@xcelenergy.com	Xcel Energy Services, Inc.		414 Nicollet Mall, 401-8 Minneapolis MN, 55401 United States	Electronic Service		No	24-352Official
71	Bobby	Deschampe	robertdeschampe@grandportage.com	Grand Portage Band of Lake Superior Chippewa		PO Box 428 Grand Portage MN, 55605 United States	Electronic Service		No	24-352Official
72	Curt	Dieren	curt.dieren@dgr.com	L&O Power Cooperative		1302 S Union St Rock Rapids IA, 51246 United States	Electronic Service		No	24-352Official
73	Kami	Diver	kamidiver@fdlrez.com	Fond du Lac Band of Lake Superior Chippewa		1720 Big Lake Road Cloquet MN, 55720 United States	Electronic Service		No	24-352Official
74	Becky	Dobbs	bdobbs@grenergy.com			null null, null United States	Electronic Service		No	24-352Official
75	J.	Drake Hamilton	hamilton@fresh-energy.org	Fresh Energy		408 St Peter St Ste 350 Saint Paul MN, 55101 United States	Electronic Service		No	24-352Official
76	Shane	Drift	sdrift@boisforte-nsn.gov	Bois Forte Band of Chippewa		Bois Forte Tribal Government 5344 Lakeshore Drive Nett Lake MN, 55772 United States	Electronic Service		No	24-352Official
77	Adam	Duininck	aduininck@ncsrcc.org	North Central States Regional Council of Carpenters		700 Olive Street St. Paul MN, 55130 United States	Electronic Service		No	24-352Official
78	Kristin W	Duncanson	kw.duncanson@gmail.com			57746 Highway 30 Mapleton MN, 56065 United States	Electronic Service		No	24-352Official
79	Wally	Dupuis	wallydupuis@fdlband.org	Fond du Lac Band of Lake Superior Chippewa		1720 Big Lake Road Cloquet MN, 55720 United States	Electronic Service		No	24-352Official
80	Kevin	Dupuis, Sr.	kevindupuis@fdlrez.com			Reservation Business Committee 1720 Big Lake	Electronic Service		No	24-352Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						Rd Cloquet MN, 55720 United States				
81	Brian	Edstrom	briane@cubminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota St Ste W1360 Saint Paul MN, 55101 United States	Electronic Service		No	24-352Official
82	Jamie	Edwards	jamie.edwards@millelacsband.com	Mille Lacs Band of Ojibwe		43408 Oodena Drive Onamia MN, 56358 United States	Electronic Service		No	24-352Official
83	Kristen	Eide Tollefson	healingsystems69@gmail.com	R-CURE		28477 N Lake Ave Frontenac MN, 55026-1044 United States	Electronic Service		No	24-352Official
84	Michael	Fairbanks	michael.fairbanks@whiteearth-nsn.gov	White Earth Reservation Business Committee		PO Box 418 White Earth MN, 56591 United States	Electronic Service		No	24-352Official
85	John	Farrell	jfarrell@ilsr.org	Institute for Local Self-Reliance		2720 E. 22nd St Institute for Local Self-Reliance Minneapolis MN, 55406 United States	Electronic Service		No	24-352Official
86	Sharon	Ferguson	sharon.ferguson@state.mn.us		Department of Commerce	85 7th Place E Ste 280 Saint Paul MN, 55101-2198 United States	Electronic Service		No	24-352Official
87	Terri	Finn	terri.goggleye@llojibwe.net			null null, null United States	Electronic Service		No	24-352Official
88	Mike	Fiterman	mikefiterman@libertydiversified.com	Liberty Diversified International		5600 N Highway 169 Minneapolis MN, 55428-3096 United States	Electronic Service		No	24-352Official
89	Christine	Fox	cfox@itasca-mantrap.com	Itasca-Mantrap Coop. Electric Assn.		PO Box 192 Park Rapids MN, 56470 United States	Electronic Service		No	24-352Official
90	Lucas	Franco	lfranco@liunagroc.com	LIUNA		81 Little Canada Rd E Little Canada MN, 55117 United States	Electronic Service		No	24-352Official
91	Ronald J.	Franz	ronald.franz@dairylandpower.com	Dairyland Power Cooperative		3200 East Ave S PO Box 817 La Crosse WI, 54602-0817 United States	Electronic Service		No	24-352Official
92	Nathan	Franzen	nathan@nationalgridrenewables.com	Geronimo Energy, LLC		8400 Normandale Lake Blvd Ste 1200 Bloomington MN, 55437 United States	Electronic Service		No	24-352Official
93	Gary	Frazer	gfrazer@mnchippewatribe.org	Minnesota Chippewa Tribe		PO Box 217 Cass Lake MN, 56633 United States	Electronic Service		No	24-352Official
94	Barb	Freese	bfreeze@mncenter.org	Minnesota Center for Environmental Advocacy		1919 University Ave W Ste 515 Saint Paul	Electronic Service		No	24-352Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						MN, 55104-3435 United States				
95	Christopher	Friez	christopher.friez@nacco.com	NACCO Natural Resources/North American Coal		918 E. Divide Ave., Suite 200 Bismarck ND, 58501 United States	Electronic Service		No	24-352Official
96	Stacey	Fujii	sfujii@greenergy.com	Great River Energy		12300 Elm Creek Boulevard Maple Grove MN, 55369-4718 United States	Electronic Service		No	24-352Official
97	Jessica	Fyhrie	jfyhrie@otpco.com	Otter Tail Power Company		PO Box 496 Fergus Falls MN, 56538-0496 United States	Electronic Service		No	24-352Official
98	Edward	Garvey	garveyed@aol.com	Residence		32 Lawton St Saint Paul MN, 55102 United States	Electronic Service		No	24-352Official
99	Benjamin	Gerber	ben@mrets.org	Midwest Renewable Energy Tracking System		60 South Sixth Street Suite 2800 Minneapolis MN, 55402 United States	Electronic Service		No	24-352Official
100	David P.	Geschwind	dp.geschwind@smpma.org	Southern Minnesota Municipal Power Agency		500 First Avenue SW Rochester MN, 55902 United States	Electronic Service		No	24-352Official
101	Shannon	Geshick	shannon.geshick@state.mn.us	Minnesota Indian Affairs Council (MIAC)		null null, null United States	Electronic Service		No	24-352Official
102	Allen	Gleckner	gleckner@fresh-energy.org	Fresh Energy		408 St. Peter Street Ste 350 Saint Paul MN, 55102 United States	Electronic Service		No	24-352Official
103	Jenny	Glumack	jenny@mrea.org	Minnesota Rural Electric Association		11640 73rd Ave N Maple Grove MN, 55369 United States	Electronic Service		No	24-352Official
104	Julie	Goehring	julie@redriverbasincommission.org			708 70 Ave NW Moorhead MN, 56560 United States	Electronic Service		No	24-352Official
105	Todd J.	Guerrero	todd.guerrero@kutakrock.com	Kutak Rock LLP		Suite 1750 220 South Sixth Street Minneapolis MN, 55402-1425 United States	Electronic Service		No	24-352Official
106	Tessa	Haagenson	tessa.haagenson@connexusenergy.com	Connexus Energy		14601 Ramsey Blvd NW Ramsey MN, 55303 United States	Electronic Service		No	24-352Official
107	Jeffrey	Haase	jhaase@greenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	24-352Official
108	Laura	Haight	lhaight@pfpi.net	Partnership for Policy Integrity		POB 2513 Amherst MA, 01004 United States	Electronic Service		No	24-352Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
109	Hal	Halpern	halhalpern@clpower.com	Cooperative Light & Power		1554 Hwy 2 P0 Box 69 Two Harbors MN, 55616 United States	Electronic Service		No	24-352Official
110	Jeremy	Hamilton	jhamilton@uppersiouxcommunity-nsn.gov	Upper Sioux Community		Upper Sioux Community PO Box 147 Granite Falls MN, 56241 United States	Electronic Service		No	24-352Official
111	David A.	Hansen	hansen@federatedrea.coop	Federated Rural Electric Association		77100 U.S. Highway 71 PO Box 69 Jackson MN, 56143 United States	Electronic Service		No	24-352Official
112	James	Hartson				59931 300th Street Waltham MN, 55982 United States	Paper Service		No	24-352Official
113	Amy	Hastings	amyh@uppersiouxcommunity-nsn.gov	Upper Sioux Community		5722 Travers Lane PO Box 147 Granite Falls MN, 56241 United States	Electronic Service		No	24-352Official
114	Erik	Hatlestad	erik@cureriver.org			117 1st St Montevideo MN, 56265 United States	Electronic Service		No	24-352Official
115	Kim	Havey	kim.havey@minneapolismn.gov	City of Minneapolis		350 South 5th Street, Suite 315M Minneapolis MN, 55415 United States	Electronic Service		No	24-352Official
116	Philip	Hayet	phayet@jkenn.com	J. Kennedy and Associates, Inc.		570 Colonial Park Drive Suite 305 Roswell GA, 30075-3770 United States	Electronic Service		No	24-352Official
117	Adam	Heinen	aheinen@dakotaelectric.com	Dakota Electric Association		4300 220th St W Farmington MN, 55024 United States	Electronic Service		No	24-352Official
118	Annette	Henkel	mui@mnutilityinvestors.org	Minnesota Utility Investors		413 Wacouta Street #230 St.Paul MN, 55101 United States	Electronic Service		No	24-352Official
119	Jessy	Hennesy	jessy.hennesy@avantenergy.com	Avant Energy		220 S. Sixth St. Ste 1300 Minneapolis MN, 55402 United States	Electronic Service		No	24-352Official
120	Kristin	Henry	kristin.henry@sierraclub.org	Sierra Club		2101 Webster St Ste 1300 Oakland CA, 94612 United States	Electronic Service		No	24-352Official
121	Benjamin	Hertz	bhertz@bepc.com	Basin Electric Power Cooperative		1717 E Interstate Ave Bismarck ND, 58503 United States	Electronic Service		No	24-352Official
122	Holly	Hinman	holly.r.hinman@xcelenergy.com	Xcel Energy		414 Nicollet Mall, 7th Floor Minneapolis MN, 55401 United States	Electronic Service		No	24-352Official
123	Joe	Hoffman	ja.hoffman@smmpa.org	SMMPA		500 First Ave SW Rochester	Electronic Service		No	24-352Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						MN, 55902-3303 United States				
124	Michael	Hoppe	lu23@ibew23.org	Local Union 23, I.B.E.W.		445 Etna Street Ste. 61 St. Paul MN, 55106 United States	Electronic Service		No	24-352Official
125	Ronald	Horman	rhorman@redwoodelectric.com	Redwood Electric Cooperative		60 Pine Street Clements MN, 56224 United States	Electronic Service		No	24-352Official
126	Rick	Horton	rhorton@minnesotaforests.com	Minnesota Forest Industries		324 West Superior Street 903 Medical Arts Building Duluth MN, 55802 United States	Electronic Service		No	24-352Official
127	Robbie	Howe	robbie.howe@llojibwe.net	Leech Lake Band of Ojibwe		190 Sailstar Drive NW Cass Lake MN, 56633 United States	Electronic Service		No	24-352Official
128	John	Ihle	ljihle@rrt.net	PlainStates Energy LLC		27451 S Hwy 34 Barnesville MN, 56514 United States	Electronic Service		No	24-352Official
129	Annie	Jackson	cheryl.jackson@whiteearth-nsn.gov	White Earth Nation		White Earth Tribal Headquarters 35500 Eagle View Road Ogemoo MN, 56569 United States	Electronic Service		No	24-352Official
130	Faron	Jackson, Sr.	faron.jackson@llojibwe.net			190 Sailstar Drive NW Cass Lake MN, 56633 United States	Electronic Service		No	24-352Official
131	Casey	Jacobson	cjacobsen@bepc.com	Basin Electric Power Cooperative		1717 East Interstate Avenue Bismarck ND, 58501 United States	Electronic Service		No	24-352Official
132	Justin	Jahnz	justin.jahnz@ecemn.com	East Central Energy		412 Main Ave N Braham MN, 55006 United States	Electronic Service		No	24-352Official
133	Alan	Jenkins	aj@jenkinsatlaw.com	Jenkins at Law		2950 Yellowtail Ave. Marathon FL, 33050 United States	Electronic Service		No	24-352Official
134	Nathan	Jensen	njensen@otpco.com	Otter Tail Power Company		215 S. Cascade St. Fergus Falls MN, 56537 United States	Electronic Service		No	24-352Official
135	Kevin	Jensvold	kevinj@uppersiouxcommunity-nsn.gov	Upper Sioux Community		PO Box 147 Granite Falls MN, 56241-0147 United States	Electronic Service		No	24-352Official
136	Annette	Johnson	annette.johnson@redlakenation.org	Red Lake Nation		15484 Migizi Drive Red Lake MN, 56671 United States	Electronic Service		No	24-352Official
137	Jody	Johnson	jody.johnson@piic.org	Prairie Island Indian Community		5636 Sturgeon Lake Rd	Electronic Service		No	24-352Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						Welch MN, 55089 United States				
138	Richard	Johnson	rick.johnson@lawmoss.com	Moss & Barnett		150 S. 5th Street Suite 1200 Minneapolis MN, 55402 United States	Electronic Service		No	24-352Official
139	Sarah	Johnson Phillips	sjphillips@stoel.com	Stoel Rives LLP		33 South Sixth Street Suite 4200 Minneapolis MN, 55402 United States	Electronic Service		No	24-352Official
140	Nate	Jones	njones@hcpd.com	Heartland Consumers Power		PO Box 248 Madison SD, 57042 United States	Electronic Service		No	24-352Official
141	Nick	Kaneski	nick.kaneski@enbridge.com	Enbridge Energy Company, Inc.		11 East Superior St Ste 125 Duluth MN, 55802 United States	Electronic Service		No	24-352Official
142	Veda	Kanitz	vmkanitz@gmail.com			null null, null United States	Electronic Service		No	24-352Official
143	Jenny	Kartes	jkartes@arrowhead.coop	Arrowhead Electric Cooperative, Inc.(P)		PO Box 39 5401 W Hwy 61 Lutsen MN, 55612 United States	Electronic Service		No	24-352Official
144	David	Kempf	dkempf@greenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	24-352Official
145	William	Kenworthy	will@votesolar.org			1 South Dearborn St Ste 2000 Chicago IL, 60603 United States	Electronic Service		No	24-352Official
146	Becky	Kern	bkern@bepc.com	Basin Electric Power Cooperative		1717 E Interstate Ave Bismarck ND, 58501 United States	Electronic Service		No	24-352Official
147	Samuel B.	Ketchum	sketchum@kennedy-graven.com	Kennedy & Graven, Chartered		150 S 5th St Ste 700 Minneapolis MN, 55402 United States	Electronic Service		No	24-352Official
148	Nazir	Khan	nazir@mnejtable.org	Minnesota Environmental Justice Table		2720 E 22nd St Minneapolis MN, 55406 United States	Electronic Service		No	24-352Official
149	Hudson	Kingston	hudson@curemn.org			PO Box 712 Ely MN, 55731 United States	Electronic Service		No	24-352Official
150	Kate	Knuth	kate.knuth@gmail.com			2347 14th Terrace NW New Brighton MN, 55112 United States	Electronic Service		No	24-352Official
151	Frank	Kohlasch	frank.kohlasch@state.mn.us		Minnesota Pollution Control Agency	520 Lafayette Rd N. St. Paul MN, 55155 United States	Electronic Service		No	24-352Official
152	Brian	Kolbinger	brian@beckertownship.org	Becker Township Board		PO Box 248 12165 Hancock St	Electronic Service		No	24-352Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						Becker MN, 55308 United States				
153	Seth	Koneczny	st.koneczny@smmpa.org	SMMPA		500 First Avenue, SW Rochester MN, 55902-3303 United States	Electronic Service	No	24-352Official	
154	Brian	Krambeer	bkrambeer@mienergy.coop	MiEnergy Cooperative		PO Box 626 31110 Cooperative Way Rushford MN, 55971 United States	Electronic Service	No	24-352Official	
155	Randy	Kramer	rlkramer89@gmail.com	Water and Soil Resources Board		42808 Co. Rd. 11 Bird Island MN, 55310 United States	Electronic Service	No	24-352Official	
156	Allen	Krug	allen.krug@xcelenergy.com	Xcel Energy		414 Nicollet Mall-7th fl Minneapolis MN, 55401 United States	Electronic Service	No	24-352Official	
157	Kay	Kuhlmann	teri.swanson@ci.red-wing.mn.us	City Of Red Wing		315 West Fourth Street Red Wing MN, 55066 United States	Electronic Service	No	24-352Official	
158	Brenda	Kyle	bkyle@stpaulchamber.com	St. Paul Area Chamber of Commerce		401 N Robert Street Suite 150 St Paul MN, 55101 United States	Electronic Service	No	24-352Official	
159	Therese	LaCanne	tlacanne@grenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service	No	24-352Official	
160	Matthew	Lacey	mlacey@grenergy.com	Great River Energy		12300 Elm Creek Boulevard Maple Grove MN, 55369-4718 United States	Electronic Service	No	24-352Official	
161	Becky	Lammi	cityclerk@ci.aurora.mn.us	City of Aurora		16 W 2nd Ave N PO Box 160 Aurura MN, 55705 United States	Electronic Service	No	24-352Official	
162	Carmel	Laney	carmel.laney@stoel.com	Stoel Rives LLP		33 South Sixth Street Suite 4200 Minneapolis MN, 55402 United States	Electronic Service	No	24-352Official	
163	Arthur	LaRose	arthur.larose@llojibwe.net	Leech Lake Band of Ojibwe		190 Sailstar Drive NW Cass Lake MN, 56633 United States	Electronic Service	No	24-352Official	
164	Robert L	Larsen	robert.larsen@lowersioux.com	Lower Sioux Indian Community		PO Box 308 39527 Reservation Highway 1 Morton MN, 56270 United States	Electronic Service	No	24-352Official	
165	Emily	Larson	elarson@duluthmn.gov	City of Duluth		411 W 1st St Rm 403 Duluth MN, 55802 United States	Electronic Service	No	24-352Official	

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
166	James D.	Larson	james.larson@avantenergy.com	Avant Energy Services		220 S 6th St Ste 1300 Minneapolis MN, 55402 United States	Electronic Service		No	24-352Official
167	Mark	Larson	mlarson@meeker.coop	Meeker Coop Light & Power Assn		1725 Highway 12 E Ste 100 Litchfield MN, 55355 United States	Electronic Service		No	24-352Official
168	Peder	Larson	plarson@larkinhoffman.com	Larkin Hoffman Daly & Lindgren, Ltd.		8300 Norman Center Drive Suite 1000 Bloomington MN, 55437 United States	Electronic Service		No	24-352Official
169	Rachel	Leonard	rachel.leonard@ci.monticello.mn.us	City of Monticello		505 Walnut St Ste 1 Monticello MN, 55362 United States	Electronic Service		No	24-352Official
170	Dan	Lesher	dlesher@grenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	24-352Official
171	Annie	Levenson Falk	annie@cubminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota Street, Suite W1360 St. Paul MN, 55101 United States	Electronic Service		No	24-352Official
172	Jesse	Levine	jesse_levine@afandpa.org			1101 K St NW Suite 700 Washington DC, 20005 United States	Electronic Service		No	24-352Official
173	Amy	Liberkowski	amy.a.liberkowski@xcelenergy.com	Xcel Energy		414 Nicollet Mall 7th Floor Minneapolis MN, 55401-1993 United States	Electronic Service		No	24-352Official
174	Eric	Lindberg	elindberg@mncenter.org	Minnesota Center for Environmental Advocacy		1919 University Avenue West Suite 515 Saint Paul MN, 55104-3435 United States	Electronic Service		No	24-352Official
175	Eric	Lipman	eric.lipman@state.mn.us		Office of Administrative Hearings	PO Box 64620 St. Paul MN, 55164-0620 United States	Electronic Service		Yes	24-352Official
176	Michelle	Lommel	mlommel@grenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	24-352Official
177	Bob	Long	rlong@larkinhoffman.com	Larkin Hoffman (Silicon Energy)		1500 Wells Fargo Plaza 7900 Xerxes Ave S Bloomington MN, 55431 United States	Electronic Service		No	24-352Official
178	Nicole	Luckey	nluckey@invenergylc.com	Invenergy LLC		1 S. Wacker Suite 1800 Chicago IL, 60606 United States	Electronic Service		No	24-352Official
179	Susan	Ludwig	sludwig@mnpower.com	Minnesota Power		30 West Superior Street Duluth MN,	Electronic Service		No	24-352Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						55802 United States				
180	Robert	Lunder	robert.lunder@mdu.com	Montana-Dakota Utilities (ET)		400 N 4th St Bismark ND, 58501 United States	Electronic Service		No	24-352Official
181	Alice	Madden	alice@communitypowermn.org	Community Power		2720 E 22nd St Minneapolis MN, 55406 United States	Electronic Service		No	24-352Official
182	Scott	Magnuson	smagnuson@bpu.org	Brainerd Public Utilities		8027 Highland Scenic Rd Baxter MN, 56425 United States	Electronic Service		No	24-352Official
183	Kavita	Maini	kmaini@wi.rr.com	KM Energy Consulting, LLC		961 N Lost Woods Rd Oconomowoc WI, 53066 United States	Electronic Service		No	24-352Official
184	Christine	Marquis	regulatory.records@xcelenergy.com	Xcel Energy		414 Nicollet Mall MN1180-07-MCA Minneapolis MN, 55401 United States	Electronic Service		No	24-352Official
185	Emily	Marshall	emarshall@lourismarshall.com	Miller O'Brien Jensen, PA		120 S. 6th Street Suite 2400 Minneapolis MN, 55402 United States	Electronic Service		No	24-352Official
186	Mary	Martinka	mary.a.martinka@xcelenergy.com	Xcel Energy Inc		414 Nicollet Mall 7th Floor Minneapolis MN, 55401 United States	Electronic Service		No	24-352Official
187	Trista	Martinson	tmartinson@recyclingandenergy.org	Ramsey/Washington Recycling & Energy Board		100 Red Rock Rd Newport MN, 55055 United States	Electronic Service		No	24-352Official
188	Gregg	Mast	gmast@cleanenergyeconomymn.org	Clean Energy Economy Minnesota		4808 10th Avenue S Minneapolis MN, 55417 United States	Electronic Service		No	24-352Official
189	Shena	Matrious	shena.matrious@millelacsband.com	Mille Lacs Band of Ojibwe		43408 Oodena Drive Onamia MN, 56349 United States	Electronic Service		No	24-352Official
190	Daryl	Maxwell	dmaxwell@hydro.mb.ca	Manitoba Hydro		360 Portage Ave FL 16 PO Box 815, Station Main Winnipeg MB, R3C 2P4 Canada	Electronic Service		No	24-352Official
191	Tim	McCarthy	tim.mccarthy@siouxvalleyenergy.com	Sioux Valley Southwestern Electric Cooperative, Inc. d/b/a Sioux Valley Energy		null null, null United States	Electronic Service		No	24-352Official
192	Scot	McClure	scotmcclure@alliantenergy.com	Interstate Power And Light Company		4902 N Biltmore Ln PO Box 77007 Madison WI, 53707-1007 United States	Electronic Service		No	24-352Official
193	April	McCormick	aprlm@grandportage.com	Grand Portage Band of Lake Superior		PO Box 428 Grand	Electronic Service		No	24-352Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
				Chippewa		Portage MN, 55605 United States				
194	Jess	McCullough	jmccullough@mnpower.com	Minnesota Power		30 W Superior St Duluth MN, 55802 United States	Electronic Service	No	24-352Official	
195	Sara G	McGrane	smcgrane@felhaber.com	Felhaber Larson		220 S 6th St Ste 2200 Minneapolis MN, 55420 United States	Electronic Service	No	24-352Official	
196	Natalie	McIntire	natalie.mcintire@gmail.com	Wind on the Wires		570 Asbury St Ste 201 Saint Paul MN, 55104-1850 United States	Electronic Service	No	24-352Official	
197	Harvey	McMahon	hmcmahon@otpco.com	Otter Tail Power Company		215 South Cascade Street Fergus Falls MN, 56537 United States	Electronic Service	No	24-352Official	
198	Taylor	McNair	taylor@gridlab.org			668 Capp Street San Francisco CA, 94110 United States	Electronic Service	No	24-352Official	
199	Ronald	Meier	rmeier@mcleodcoop.com	Mcleod Cooperative Power		3515 11th St East Glencoe MN, 55336 United States	Electronic Service	No	24-352Official	
200	Melanie	Mesko Lee	melanie.lee@burnsvillemn.gov	City of Burnsville		100 Civic Center Parkway Burnsville MN, 55337-3867 United States	Electronic Service	No	24-352Official	
201	Peder	Mewis	pmewis@cleangridalliance.org	Clean Grid Alliance		570 Asbury St. St. Paul MN, 55104 United States	Electronic Service	No	24-352Official	
202	Joseph	Meyer	joseph.meyer@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	Bremer Tower, Suite 1400 445 Minnesota Street St Paul MN, 55101-2131 United States	Electronic Service	No	24-352Official	
203	Valentina	Mgeni	valentina.mgeni@piic.org	Prairie Island Indian Community		Prairie Island Indian Community 5636 Sturgeon Lake Road Welch MN, 55089 United States	Electronic Service	No	24-352Official	
204	Cole W.	Miller	cole.miller@shakopeedakota.org	Shakopee Mdewakanton Sioux Community		Shakopee Mdewakanton Sioux Community 2330 Sioux Trail NW Prior Lake MN, 55372 United States	Electronic Service	No	24-352Official	

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
205	Stacy	Miller	stacy.miller@minneapolismn.gov	City of Minneapolis		350 S. 5th Street Room M 301 Minneapolis MN, 55415 United States	Electronic Service		No	24-352Official
206	David	Moeller	dmoeller@allete.com	Minnesota Power			Electronic Service		No	24-352Official
207	Dalene	Monsebrotten	dalene.monsebrotten@nmpagency.com	Northern Municipal Power Agency		123 2nd St W Thief River Falls MN, 56701 United States	Electronic Service		No	24-352Official
208	Sarah	Mooradian	sarah@curemn.org	CURE		117 South 1st Street Montevideo MN, 56265 United States	Electronic Service		No	24-352Official
209	Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP		33 South Sixth St Ste 4200 Minneapolis MN, 55402 United States	Electronic Service		No	24-352Official
210	Travis	Morrision	travis.morrison@boisforte-nsn.gov	Bois Forte Band of Chippewa		Bois Forte Tribal Government 5344 Lakeshore Drive Nett Lake MN, 55772 United States	Electronic Service		No	24-352Official
211	David	Morrison, Sr.	david.morrison@boisforte-nsn.gov	Bois Forte Band of Chippewa		Bois Forte Tribal Government 5344 Lakeshore Drive Nett Lake MN, 55772 United States	Electronic Service		No	24-352Official
212	Evan	Mulholland	emulholland@mncenter.org	Minnesota Center for Environmental Advocacy		1919 University Ave W Ste 515 Saint Paul MN, 55101 United States	Electronic Service		No	24-352Official
213	Alan	Muller	alan@greendel.org	Energy & Environmental Consulting		1110 West Avenue Red Wing MN, 55066 United States	Electronic Service		No	24-352Official
214	Sonny	Myers	smyers@1854treatyauthority.org	1854 Treaty Authority		4428 Haines Rd Duluth MN, 55811-1524 United States	Electronic Service		No	24-352Official
215	Ben	Nelson	benn@cmpasgroup.org	CMMPA		459 South Grove Street Blue Earth MN, 56013 United States	Electronic Service		No	24-352Official
216	Carl	Nelson	cnelson@mncee.org	Center for Energy and Environment		212 3rd Ave N Ste 560 Minneapolis MN, 55401 United States	Electronic Service		No	24-352Official
217	Deb	Nelson	dnelson@greenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	24-352Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
218	David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency		220 South Sixth Street Suite 1300 Minneapolis MN, 55402 United States	Electronic Service		No	24-352Official
219	Duane	Ninneman	duane@cureriver.org	Clean Up the River Environment		117 South 1st St Montevideo MN, 56265 United States	Electronic Service		No	24-352Official
220	Michael	Noble	noble@fresh-energy.org	Fresh Energy		408 Saint Peter St Ste 350 Saint Paul MN, 55102 United States	Electronic Service		No	24-352Official
221	Rolf	Nordstrom	rnordstrom@gpisd.net	Great Plains Institute		2801 21ST AVE S STE 220 Minneapolis MN, 55407-1229 United States	Electronic Service		No	24-352Official
222	Samantha	Norris	samanthanorris@alliantenergy.com	Interstate Power and Light Company		200 1st Street SE PO Box 351 Cedar Rapids IA, 52406-0351 United States	Electronic Service		No	24-352Official
223	M. William	O'Brien	bobrien@mojlaw.com	Miller O'Brien Jensen, P.A.		120 S 6th St Ste 2400 Minneapolis MN, 55402 United States	Electronic Service		No	24-352Official
224	Ric	O'Connell	ric@gridlab.org	GridLab		2120 University Ave Berkeley CA, 94704 United States	Electronic Service		No	24-352Official
225	Joseph	OBrien	joey.obrien@lowersioux.com			39527 Highway 1 Morton MN, 56270 United States	Electronic Service		No	24-352Official
226	Lori	Olinger	olingers25@msn.com	Coalition for Plastic Reduction		25 Deer Hills DR North Oaks MN, 55127 United States	Electronic Service		No	24-352Official
227	Matthew	Olsen	molsen@otpco.com	Otter Tail Power Company		215 South Cascade Street Fergus Falls MN, 56537 United States	Electronic Service		No	24-352Official
228	Russell	Olson	rolson@hcpd.com	Heartland Consumers Power District		PO Box 248 Madison SD, 57042-0248 United States	Electronic Service		No	24-352Official
229	Debra	Opatz	dopatz@otpco.com	Otter Tail Power Company		215 South Cascade Street Fergus Falls MN, 56537 United States	Electronic Service		No	24-352Official
230	Mikayla	Osterman	mosterman@otpco.com	Otter Tail Power Company		215 S Cascade St PO Box 496 Fergus Falls MN, 56537 United States	Electronic Service		No	24-352Official
231	Jamie	Overgaard	jovergaard@minnkota.com	Minnkota Power Cooperative, Inc.		5301 32nd Ave S Grand Forks ND, 58201 United States	Electronic Service		No	24-352Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
232	Carol A.	Overland	overland@legalelectric.org	Legalelectric - Overland Law Office		1110 West Avenue Red Wing MN, 55066 United States	Electronic Service		No	24-352Official
233	Gregory	Padden	gpadden@grenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	24-352Official
234	Jessica	Palmer Denig	jessica.palmer-denig@state.mn.us		Office of Administrative Hearings	600 Robert St N PO Box 64620 St. Paul MN, 55164 United States	Electronic Service		No	24-352Official
235	Marsha	Parlow	mparlow@grenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	24-352Official
236	Priti	Patel	ppatel@grenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369-4718 United States	Electronic Service		No	24-352Official
237	Gerad	Paul	gpaul@minnkota.com	Minnkota Power Cooperative		5301 32nd Ave S Grand Forks ND, 58201 United States	Electronic Service		No	24-352Official
238	Earl	Pendleton	earl.pendleton@lowersioux.com	Lower Sioux Indian Community		39527 Highway 1 Morton MN, 56270 United States	Electronic Service		No	24-352Official
239	Mary Beth	Peranteau	mperanteau@fredlaw.com	Fredrikson & Byron, P.A.		44 East Mifflin Street Suite 1000 Madison WI, 53703 United States	Electronic Service		No	24-352Official
240	Thom	Petersen	thom.petersen@state.mn.us		Minnesota Department of Agriculture	625 North Robert St Saint Paul MN, 55155 United States	Electronic Service		No	24-352Official
241	Luke	Peterson	luke.peterson@hpuc.com	Hibbing Public Utilities Commission		1902 Sixth Ave E Hibbing MN, 55746 United States	Electronic Service		No	24-352Official
242	Neil	Peterson	info@nclucb.org	Northern Counties Land Use Coordinating Board		null null, null United States	Electronic Service		No	24-352Official
243	Gordon	Pietsch	gpietsch@grenergy.com	Great River Energy		12300 Elm Creek Blvd. Maple Grove MN, 55369-4718 United States	Electronic Service		No	24-352Official
244	Joe	Plumer	joe.plumer@redlakenation.org	Red Lake Nation		15484 Migizi Drive Red Lake MN, 56671 United States	Electronic Service		No	24-352Official
245	Kaci	Poor	kwp@floomenergylaw.com	Floom Energy Law PLLC		3100 Clarendon Blvd. Suite 920 Arlington VA, 22201 United States	Electronic Service		No	24-352Official
246	J.	Porter	greg.porter@nngco.com	Northern Natural Gas Company		1111 South 103rd St Omaha NE,	Electronic Service		No	24-352Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						68124 United States				
247	Kevin	Pranis	kpranis@liunagroc.com	Laborers' District Council of MN and ND		81 E Little Canada Road St. Paul MN, 55117 United States	Electronic Service		No	24-352Official
248	Robert	Prescott	bob.prescott@lowersioux.com	Lower Sioux Indian Community		39527 Highway 1 Morton MN, 56270 United States	Electronic Service		No	24-352Official
249	David	Raatz	draatz@bepc.com	Basin Electric Power Cooperative		1717 East Interstate Avenue Bismarck ND, 58501 United States	Electronic Service		No	24-352Official
250	John C.	Reinhardt		Laura A. Reinhardt		3552 26th Ave S Minneapolis MN, 55406 United States	Paper Service		No	24-352Official
251	Victoria	Reinhardt	victoria.reinhardt@co.ramsey.mn.us	Partnership on Waste and Energy		Ramsey County Board Office 15 W. Kellogg Blvd., Ste. 220 St. Paul MN, 55102 United States	Electronic Service		No	24-352Official
252	Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	1400 BRM Tower 445 Minnesota St St. Paul MN, 55101-2131 United States	Electronic Service		Yes	24-352Official
253	Kevin	Reuther	kreuther@mncenter.org	MN Center for Environmental Advocacy		26 E Exchange St, Ste 206 St. Paul MN, 55101-1667 United States	Electronic Service		No	24-352Official
254	Micah	Revell	micah.revell@stinson.com	Stinson LLP		50 South Sixth St Ste 2600 Minneapolis MN, 55402 United States	Electronic Service		No	24-352Official
255	John	Richards	johnrichards@nweco.com	Northwestern Wisconsin Electric Company		104 S. Pine St. Grantsburg WI, 54840 United States	Electronic Service		No	24-352Official
256	Susan	Romans	sromans@allete.com	Minnesota Power		30 West Superior Street Legal Dept Duluth MN, 55802 United States	Electronic Service		No	24-352Official
257	Stephan	Roos	stephan.roos@state.mn.us		Minnesota Department of Agriculture	625 Robert St N Saint Paul MN, 55155-2538 United States	Electronic Service		No	24-352Official
258	B.	Rosas	b.rosas@climategen.org			1427 Monroe Street NE #2 Minneapolis MN, 55413 United States	Electronic Service		No	24-352Official
259	Alan	Roy	alan.roy@whiteearth-nsn.gov	White Earth Nation		White Earth Tribal Headquarters 35500 Eagle View Road	Electronic Service		No	24-352Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						Ogema MN, 56569 United States				
260	Bill	Rudnicki	bill.rudnicki@shakopeedakota.org	Shakopee Mdewakanton Sioux Community	Shakopee Mdewakanton Sioux Community 2330 Sioux Trail NW Prior Lake MN, 55372 United States	Shakopee Mdewakanton Sioux Community 2330 Sioux Trail NW Prior Lake MN, 55372 United States	Electronic Service		No	24-352Official
261	Nathaniel	Runke	nrunke@local49.org			611 28th St. NW Rochester MN, 55901 United States	Electronic Service		No	24-352Official
262	Zachary	Ruzycki	zruzycki@grenergy.com	Great River Energy		12300 Elm Creek Boulevard Maple Grove MN, 55369 United States	Electronic Service		No	24-352Official
263	Robert K.	Sahr	bsahr@eastriver.coop	East River Electric Power Cooperative		P.O. Box 227 Madison SD, 57042 United States	Electronic Service		No	24-352Official
264	Todd	Sailer		Minnetonka Power Cooperative		5301 32nd Ave. S Grand Forks ND, 58201 United States	Paper Service		No	24-352Official
265	Miranda	Sam	miranda.sam@lowersioux.com	Lower Sioux Indian Community		39527 Reservation Highway 1 PO Box 308 Morton MN, 56270 United States	Electronic Service		No	24-352Official
266	Joseph L	Sathe	jsathe@kennedy-graven.com	Kennedy & Graven, Chartered		150 S 5th St Ste 700 Minneapolis MN, 55402 United States	Electronic Service		No	24-352Official
267	Adam	Savariego	adams@uppersiouxcommunity-nsn.gov	Upper Sioux Community		5722 Travers Lane PO Box 147 Granite Falls MN, 56241 United States	Electronic Service		No	24-352Official
268	John	Saxhaug	john_saxhaug@yahoo.com			3940 Harriet Ave Minneapolis MN, 55409 United States	Electronic Service		No	24-352Official
269	Jean	Schafer	jeans@bepc.com	Basin Electric Power Cooperative		1717 E Interstate Ave Bismarck ND, 58501 United States	Electronic Service		No	24-352Official
270	Eric	Schenck	eric.schenck@state.mn.us	EWS		1530 Cleveland Ave. N St. Paul MN, 55108 United States	Electronic Service		No	24-352Official
271	Jeff	Schneider	jeff.schneider@ci.red-wing.mn.us	City of Red Wing		315 West 4th Street Red Wing MN, 55066 United States	Electronic Service		No	24-352Official
272	Kay	Schraeder	kschraeder@minnkota.com	Minnkota Power		5301 32nd Ave S Grand Forks ND, 58201 United States	Electronic Service		No	24-352Official
273	Kathleen	Schuler	keschuler47@gmail.com			1520 10th Ave S #2	Electronic Service		No	24-352Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						Minneapolis MN, 55404 United States				
274	Robert H.	Schulte	rhs@schulteassociates.com	Schulte Associates LLC		1742 Patriot Rd Northfield MN, 55057 United States	Electronic Service	No	24-352Official	
275	J.P.	Schumacher	jps@mrenergy.com	Missouri River Energy Services		null null, null United States	Electronic Service	No	24-352Official	
276	Kevin	Schumacher	kevin@mrets.org	Midwest Renewable Energy Tracking System		null null, null United States	Electronic Service	No	24-352Official	
277	Ronald J.	Schwartau	rschwartau@noblesce.com	Nobles Electric Cooperative		22636 U.S. Hwy. 59 Worthington MN, 56187 United States	Electronic Service	No	24-352Official	
278	Douglas	Seaton	doug.seaton@umwlc.org	Upper Midwest Law Center		8421 Wayzata Blvd Ste 300 Golden Valley MN, 55426 United States	Electronic Service	No	24-352Official	
279	Dean	Sedgwick	sedgwick@itascapower.com	Itasca Power Company		PO Box 455 Spring Lake MN, 56680 United States	Electronic Service	No	24-352Official	
280	Jessie	Seim	jessie.seim@piic.org	Prairie Island Indian Community		5636 Sturgeon Lake Rd Welch MN, 55089 United States	Electronic Service	No	24-352Official	
281	Darrell	Seki, Sr.	dseki@redlakenation.org			15484 Migizi Drive Red Lake MN, 56671 United States	Electronic Service	No	24-352Official	
282	Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates		7400 Lyndale Ave S Ste 190 Richfield MN, 55423 United States	Electronic Service	No	24-352Official	
283	Bria	Shea	bria.e.shea@xcelenergy.com	Xcel Energy		414 Nicollet Mall Minneapolis MN, 55401 United States	Electronic Service	No	24-352Official	
284	Andrew R.	Shedlock	andrew.shedlock@kutakrock.com	Kutak Rock LLP		60 South Sixth St Ste 3400 Minneapolis MN, 55402-4018 United States	Electronic Service	No	24-352Official	
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298	Russ	Stark	russ.stark@ci.stpaul.mn.us	City of St. Paul		Mayor's Office 15 W. Kellogg Blvd., Suite 390 Saint Paul MN, 55102 United States	Electronic Service		No	24-352Official
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301	Mark	Strohpus	mstrohpus@greenergy.com	Great River Energy		12300 Elm Creek Boulevard Maple Grove MN, 55369-4718 United States	Electronic Service		No	24-352Official

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