

November 17, 2021

VIA ELECTRONIC FILING

Will Seuffert
Executive Secretary
Minnesota Public Utilities Commission
121 Seventh Place East, Suite 350
St. Paul, MN 55101

Re: *Proposed Permanent Rules Relating to Power Plants or Lines; Revising the Certificate of Need and Site or Route Permit Requirements; Revisor ID R-4151*

Proposed Amendment to Rules Governing Certificates of Need and Site and Route Permits for Large Electric Power Plants and High-Voltage Transmission Lines, Minnesota Rules 7849 and 7850 and Governing Notice Plan Filings Requirements, Minnesota Rules, part 7929.2550; Request to Schedule a Rules Hearing; and Request to Review Additional Notice Plan; Including Repeal of Minn. R. 7829.2550; 7849.0230; 7849.0240; 7849.1100; 7849.1300; 7850.1600; 7850.2000; 7850.2900; 7850.3000; 7850.3100; 7850.3200; 7850.3300; 7850.3400; 7850.3500; 7850.3600; 7850.4000; 7850.4200; MPUC Docket No. - ET999, E999, IP999/R-12-1246

Dear Mr. Seuffert:

Pursuant to the ***DUAL NOTICE: Notice of Intent to Adopt Rules Without a Public Hearing Unless 25 or More Persons Request a Hearing, and Notice of Hearing if 25 or More Request for Hearing Are Received; Revisor's ID 4151 and Proposed Amendment to Rules Governing Certificates of Need and Site and Route Permits for Large Electric Power Plants and High-Voltage Transmission Lines*** ("Dual Notice") issued by the Minnesota Public Utilities Commission ("MPUC" or "Commission") on September 30, 2021, Hibbing Public Utilities Commission ("HPUC") respectfully submits its Comments on the proposed rule changes and requests a hearing be held on December 6, 2021 as detailed in the Dual Notice.

HPUC thanks the Commission for the opportunity to provide these comments. Please contact me if you have any questions regarding this filing.

Sincerely,

Stinson LLP

/s/ Lisa A. Crum

Lisa A. Crum

cc: Service List

50 South Sixth Street, Suite 2600, Minneapolis, MN 55402

STATE OF MINNESOTA
BEFORE THE
PUBLIC UTILITIES COMMISSION

*Proposed Permanent Rules Relating to Power
Plants or Lines; Revising the Certificate of
Need and Site or Route Permit Requirements;
Revisor ID R-1451*

MPUC Docket No. ET999, E999,
IP999/R-12-1246

COMMENTS OF
HIBBING PUBLIC UTILITIES
COMMISSION

**Proposed Amendment to Rules Governing
Certificates of Need and Site and Route
Permits for Large Electric Power Plants and
High-Voltage Transmission Lines, Minnesota
Rules 7849 and 7850 and Governing Notice
Plan Filings Requirements, Minnesota Rules,
part 7929.2550; Request to Schedule a Rules
Hearing; and Request to Review Additional
Notice Plan; Including Repeal of Minn. R.
7829.2550; 7849.0230; 7849.0240; 7849.1100;
7849.1300; 7850.1600; 7850.2000; 7850.2900;
7850.3000; 7850.3100; 7850.3200; 7850.3300;
7850.3400; 7850.3500; 7850.3600; 7850.4000;
7850.4200**

Pursuant to the *DUAL NOTICE: Notice of Intent to Adopt Rules Without a Public Hearing Unless 25 or More Persons Request a Hearing, and Notice of Hearing if 25 or More Request for Hearing Are Received; Revisor's ID 4151 and Proposed Amendment to Rules Governing Certificates of Need and Site and Route Permits for Large Electric Power Plants and High-Voltage Transmission Lines* ("Dual Notice") issued by the Minnesota Public Utilities Commission ("MPUC" or "Commission") on September 30, 2021, Hibbing Public Utilities Commission ("HPUC") respectfully submits its Comments on the proposed rule changes and requests a hearing be held on December 6, 2021 as detailed in the Dual Notice.

INTRODUCTION

As discussed below, HPUC provides comments to the proposed rule changes to ensure that the certificate of need ("CN") process provides a fair and open opportunity for the Commission's consideration

and review of all infrastructure investment applicable under the rules, including important investments that will be sought by HPUC into the future as HPUC and likely other municipal utilities consider options for more municipal-owned generation and transmission additions. As our state and region look at new challenges facing energy delivery and carbon free and renewable energy, the Commission must look to new ways of determining resource adequacy to meet these challenges. The current process of resource planning and CN determinations is not necessarily designed to promote municipality control over generation and transmission since these processes seem to have been more designed for state-regulated utilities and generation and transmission utilities. In the future, municipal utilities will continue to expand and broaden their services to their customers given climate goals and reliability challenges and because previously detailed MISO control areas do not depict an accurate reflection of the current scope and potential of our energy system as a whole, the CN process must evolve to avoid being a process of status quo planning which will ultimately cause an infringement on the independent municipal utility commissions throughout the state including HPUC.

Current state-level utility planning processes greatly undervalue places like Hibbing that have the need and customer desire for community-owned and community-controlled generation and these processes likewise inhibit the ability of HPUC to escape "behind the meter" transmission system disadvantages in building its energy future. Hibbing's generation facilities can provide a great net benefit to not only Hibbing's customers but to the regional power grid as a whole, however, this important role of HPUC is largely left out of many CN and resource planning discussions at the state level. The lack of municipal resource consideration often results in state-regulated utilities advocating projects that may not be as beneficial, or that in fact may potentially contradict, long-term reliability challenges for our communities and state. The CN rules and process make obvious that state-regulated utilities are provided an incentive to build new generation and transmission by revenue requirements approved in utility rates by the Commission, however, this added financial incentive for state-regulated utilities' investors should not fog the CN and resource planning processes in favor of state-regulated utilities without a full account

of a project's impacts on other state priorities such as municipal utility planning and resources as well as distributed generation efforts. If the incumbent state-regulated utilities are so incentivized to build a self-owned or controlled project and are also required to demonstrate "need" for the project, indeed this is a self-fulfilling process for the utility and could exclude many of the community priorities in Greater Minnesota not typically addressed in MPUC proceedings.

Importantly, HPUC advocates in these comments that the process of including a broad array of stakeholders at the rulemaking table, including municipal utilities such as Hibbing, will ensure that multiple perspectives and needs are taken into account while measuring adequacy and planning for Minnesota's and the region's energy future. HPUC respectfully requests an opportunity to be heard on these comments at a hearing on December 6, 2021 as detailed in the Dual Notice.

DISCUSSION

I. HIBBING IS A STATUTORY CITY THAT IS ALLOWED TO OWN AND OPERATE ANY WATERWORKS, DISTRICT HEATING SYSTEM, OR GAS, LIGHT, POWER, OR HEAT PLANT FOR SUPPLYING ITS OWN NEEDS FOR UTILITY SERVICE OR FOR SUPPLYING SERVICE TO PRIVATE CUSTOMERS OR BOTH AND HAS ESTABLISHED SUCH PUBLIC UTILITY AND A PUBLIC UTILITES COMMISSION TO OVERSEE ITS OPERATIONS.

A. HPUC actively serves Hibbing and its surrounding areas and plans to continue operating and expanding its services to the community well into the future.

HPUC is a municipal public utility commission that has been serving the City of Hibbing and the surrounding area for over 125 years.¹ It serves residential, commercial and governmental needs for electricity, natural gas, water and steam to keep the lights on and homes and businesses warm in the winter and cool in the summer. In the last year, HPUC provided customers with 110 million kilowatt-hours of electricity, 609 million cubic feet of natural gas, and 362 million pounds of steam. HPUC connected 5223 residential customers and 524 commercial customers to water and provided water to 626 fire hydrants around the city and the surrounding area.² HPUC is a valued partner for the City of Hibbing and

¹ See www.hpuc.com

² *Id.*

surrounding areas and plans to continue operating and expanding its services as a means of providing the community with reliable and adequate power well into the future.

The Minnesota legislature has recognized the important role that municipal utilities, like HPUC, play in communities. As part of that recognition, the Minnesota legislature has granted municipal utilities statutory authority to conduct a wide array of activities.³ HPUC, as a municipal utility, has the authority to conduct and direct its business by entering contracts, requesting bids for services, hiring and handling personnel, buying fuel and wholesale energy, and fixing the rates for utility services.⁴ HPUC also has the authority to own and operate utility services such as water, heating, gas and power.⁵ Importantly, HPUC may construct or install facilities to provide utility services.⁶

Hibbing began operating its public utility in 1895 by issuing bonds to purchase the small water works financed by struggling mining operations.⁷ The HPUC works in conjunction with the Hibbing City Council.⁸ The HPUC consists of five members appointed by the Hibbing City Council, each serving for a term of three years.⁹

B. The letter and spirit of HPUC's municipal legal right of control is relevant to the state-level CN and site/route processes to avoid infringement on a municipal utility's rights under state statute.

The current CN processes at the state level must ensure that incumbent state utilities cannot bypass necessary steps of a municipality's statutory obligations in directing and managing its municipal assets and services under the law.¹⁰ As currently detailed in a municipal utility's statutory mandate, a municipality must control its utility assets for purposes of serving its customers. Direct or indirect impacts

³ See Minn. Stat. §§ 412.321-.391.

⁴ Minn. Stat. § 412.361.

⁵ Minn. Stat. § 412.321, subd. 1.

⁶ *Id.*

⁷ See www.hpuc.com

⁸ Minn. Stat. § 412.331.

⁹ Minn. Stat. § 412.341, subd. 1.

¹⁰ See Minn. Stat. §§ 412.321-.391.

on these statutory obligations and rights of control are potentially harmful to the balance of a municipal's authority and ability to provide reliable service.

While the evolution of the interconnected transmission system has certainly impacted the relationship between municipal utilities and state-regulated utilities, including MISO and the grid as a whole, the spirit of a municipal's rights and obligations must remain relevant to a CN inquiry and determination to ensure its inclusion in the analysis of an applicant's "need." Not only does the law require that parallel need for municipal control be satisfied on a practical level, the assurance of a broad-based approach that satisfies stakeholders outside of the state-regulated utility's self-interest can substantially bolster the important job of the Commission to ensure that adequate proxies of "the invisible hand of the market" are enshrined in the oversight of state-allowed monopolies.

II. STATE RULES AND PROCESSES MUST NECESSARILY CONSIDER THE IMPACTS THAT STATE ENERGY RESOURCE DECISIONS MAY HAVE ON A MUNICIPAL UTILITY SUCH AS HPUC BECAUSE HPUC HAS INDEPENDENT STATUTORY AUTHORITY TO OWN, OPERATE AND CONSTRUCT ENERGY FACILITIES FOR ITS CITY AND SURROUNDING COMMUNITIES, OUTSIDE MPUC JURISDICTION.

A. The CN criteria in Minn. R. 7849 must be bolstered to ensure that HPUC is not potentially disadvantaged or lacking in consideration by the Commission when an applicant proposes new generation and transmission projects that affect Hibbing customers and industries important in the City of Hibbing area.

The CN criteria in Minn. R. 7849.0115, subp. 1, has been changed in the proposed rules in a way that could potentially disadvantage HPUC in the event that a state-regulated utility or other applicant applies to construct new facilities. Based on the proposed new language, the applicant would need to demonstrate that the projected demand for electricity cannot be met "using existing resources." This new language implies that "existing resources" would be those belonging to the applicant and not include resources outside of, yet available to, the applicant's system. For a municipality that is statutorily allowed to construct and install all facilities reasonably needed for serving its customers, this new proposed language fails to consider HPU's continuing challenges of being without adequate transmission and

substation facilities to connect HPU's system to the bulk electric system. Without this functionality, HPU cannot fully operate, expand and service its customers as contemplated in its statutory authority.

To ensure that the Commission has all of the information necessary to consider an applicant's CN proposal for new facilities and to ensure that a municipality's resources are not overlooked in the state CN process, HPU proposes the following change to PUC Proposed Rule 7849.0115, subp. 1 as follows:

Subpart 1. Need demonstration. An applicant for a certificate of need must demonstrate that the projected demand for electricity cannot be met using existing resources, or more cost-effectively through energy conservation and load-management measures, unless the applicant otherwise justifies its need, considering the criteria in part 7849.0120. An applicant for a certificate of need must also demonstrate that local generation or transmission sources, outside of an applicant's system but applicable to the applicant's request and within an applicant's service territory if relevant, cannot be used to meet its projected demand for electricity, including municipal utility resources currently in place or planned for future operation.

HPUC's proposed language change in 7849.0115, subp. 1, is consistent with the Commission's Statement of Need and Reasonableness ("SONAR") for the rule changes.¹¹ The SONAR states clearly that "[i]t is necessary and reasonable to require an applicant to demonstrate the need for a proposed project."¹² In determining "need" for a CN determination, the Commission should consider HPUC's and other municipal's resources as well as the necessity for a municipality to retain control of the assets and services it contracts for to serve its customers. By including a municipal utilities' resources in the CN record, the Commission would be able to consider whether an applicant could potentially meet some or all of its projected demand for electricity in collaboration with the municipal utility which could in turn better serve communities and promote reliability.

¹¹ *In the Matter of Possible Amendments to Rules Governing Certificates of Need and Site and Route Permits for Large Electric Power Plants and High-Voltage Transmission Lines, Minnesota Rules Chapters 7849 and 7850; and to Rules Governing Notice Plan Filing Requirements for High-Voltage Transmission Lines, Minnesota Rules, part 7929.2550, MPUC Docket No. E, ET, IP-999/R-12-1246*; Statement of Need and Reasonableness, dated October 11, 2021 ("MPUC SONAR").

¹² MPUC SONAR at 8.

B. HPU is not rate-regulated by the Commission and does not receive Commission approval for its resource planning so it is important to avoid infringing on HPUC's municipal control area and ensure that the Commission has information to help it understand the impacts that an applicant's CN has on Minnesota's affected communities.

Under Minn. Stat. § 216B.02, subd. 4, a "public utility" does not include a municipality for purposes of state utility regulation. Additionally, under the Commission's resource planning statutes, municipalities are not required to file resource plans for Commission approval.¹³ Therefore, to ensure that the Commission has adequate information to consider the impacts that a CN applicant's project may have on a municipal utility and its customers, the CN rules must include additional information for the Commission's consideration in its decision making. In light of the Commission's limited knowledge of municipal utility operations and planning, HPUC's proposal in Section A above is consistent with the overall intent of the CN criteria and process.

Moreover, the CN rules contain various provisions that act to expand and broaden the record for the Commission to ensure that the best information is available when considering a CN application and similar expansions to accommodate municipality resource considerations are appropriate. For example, Minn. R. 7849.0220, subp. 2, addresses the larger regional transmission planning process for purposes of providing the Commission with regional transmission planning because, as the SONAR states, "both transmission and generation projects implicate the transmission system."¹⁴ Similarly, municipal systems are greatly impacted by CN decisions where an applicant simply includes municipal services as part of its "load" or "forecasting" and fails to provide more detailed information that could inform the Commission.¹⁵ Such detailed municipal system's data and information would be helpful for the Commission to have for consideration in the CN record.

¹³ See Minn. Stat. § 216B.2422.

¹⁴ MPUC SONAR at 18.

¹⁵ See, e.g., *In the Matter of the Application of Northern States Power Company d/b/a Xcel Energy for Authority to Increase Rates for Electric Service in Minnesota*, MPUC Docket No. E-002/GR-08-1065, Initial Filing, Exhibit ___ (SJB-1), Schedule 2 at 2 (illustrating Xcel's approach to report incomplete municipal load in its load data without providing detailed information for Commission consideration) (copy attached).

With regard to regional planning, the MPUC SONAR appropriately states that "[i]t is necessary and reasonable to require regional planning information, which is relevant to the Commission's evaluation of the applicable statutory criteria, including consideration of regional energy needs" as this information will help to "facilitate development of a complete record on the claimed need for the proposed project."¹⁶ Municipal utility resources and planning efforts are equally as important as regional planning and entitled to the same considerations by the Commission in CN applications. Minnesota communities depend on their municipal utilities to provide reliable services on an ongoing basis and these communities are entitled to be part of the CN considerations that will ultimately impact their local utilities.

HPUC likewise encourages the Commission to consider expansion of other appropriate rule provisions that will aid in its analysis of CN applications. The following additional examples of CN criteria could be revised to include municipal utility resource requirements:

(1) expanding the CN applicant's responsibilities for providing mapping of the applicant's system and service territory to also include municipal utility information such as HPUC's known generation sources, transmission constraints and substation issues.¹⁷

(2) requiring the applicant to more fully address reliability risks in full consideration of HPUC's resources and resource plans for the future since "it is reasonable to require the applicant to file such data to facilitate record development on reliability;"¹⁸ and

(3) broadening the CN applicant's requirements to submit analysis of a utility's existing electric system and the current transmission system's ability to reliably meet the existing load including models that show the inclusion of a system such as HPUC's underlying system and how it can work with the applicant's system in answering questions as to types of facilities that should be built to meet load forecasts that are fully supported by the record.¹⁹

¹⁶ MPUC SONAR at 18.

¹⁷ See Minn. R. 7849.0250(A)(6); MPUC SONAR at 19.

¹⁸ See Minn. R. 7849.0260(B)(1) and (2); MPUC SONAR at 23.

¹⁹ See Minn. R. 7849.0270(A); MPUC SONAR at 25.

C. HPUC, as well as all municipal utilities that choose to participate, must be included in the Commission-appointed Citizen Advisory Task Forces and Program Advisory Task Forces.

Pursuant to the Commission's authority to appoint a citizen advisory task force and program advisory task force to aid in effective state-level decision making, HPUC respectfully requests that it be granted an opportunity to participate to ensure that the work of the advisory task forces provides a full and fair development of the record. The proposed rule change in Minn. R. 7850.2400, subp. 3, adds a requirement that "the Department must file a report with the commission summarizing the task force's work" and this report must reflect task force recommendations on routes and sites of the applicant's project. Such information would be greatly expanded by including HPUC and local and Greater Minnesota participation in the advisory task force work, which in turn provides a better record for the Commission and a better outcome for our state and communities.

III. THE STATE'S RESOURCE PLANNING, CERTIFICATE OF NEED, AND SITING AND ROUTING DECISIONS MUST ADDRESS CHANGING RESOURCE NEEDS THROUGHOUT THE STATE TO ENSURE THAT THE COMMISSION IS NOT OVERLOOKING THE IMPORTANT LOCAL ENERGY NEEDS OF SYSTEM RELIABILITY AND AFFORDABILITY FOR OUR MINNESOTA COMMUNITIES.

A. HPUC must be considered an integral part of the state-level dialogue on long-term regional grid reliability.

As our state faces a multitude of evolving and changing energy resource issues and long-term reliability challenges for Minnesota customers, the Commission will need to rely on more expanded and inclusive stakeholder involvement to ensure that all of the necessary information is included in the record development for CN applications. HPUC desires to become part of the state and regional grid reliability discussions to promote a more diverse and decentralized resource planning and development process that will ensure that smaller generation systems (like HPUC's current system) is not undervalued for what it can provide as "back up" power or "alternative energy." Multiple perspectives and needs must be taken into account for the Commission to fully assess adequacy and planning for Minnesota's energy future.

There is a great need for regulators to reconsider resource adequacy and long-term reliability planning in conjunction with CN applications keeping a broader view in mind. Due to changing resources, evolving policy goals for decarbonization, and recurring catastrophic major weather events, attention must be devoted to resource adequacy for the long-term. Without careful assessment and planning, traditional CN considerations and other state and federal resource planning methods concentrating on outdated means of determining reliability and meeting customer needs could negatively impact Commission decision making in the future.

Additionally, the geographic nature of our state's monopoly utility service territories dictates that special attention be paid to critical Greater Minnesota issues including socio-economic impacts of CN and resource decisions, the dangers of "averaging" customer information and data over a utility's entire system, and perhaps most specifically, the large-scale effects of CN determinations on the Greater Northern Minnesota region as a whole.

HPUC encourages the Commission to consider expanding the information available for purposes of collecting as much information as possible for consideration of an applicant's CN application, requiring expanded metrics and data to provide a bigger picture than an applicant's general system, and putting the burden on the CN applicant to bring forward better information on load predications and shortfall events to better assist the Commission in making decisions on the need for projects. Minnesota's energy system can only function at its best for all customers when long-term reliability and resource planning is done in a fully informed process.

B. HPUC encourages the Commission to convene a Minnesota Resource Adequacy Metrics Advisory Group to explore resource adequacy metrics on a broad scale for use in MPUC dockets and decisions.

HPUC has advocated in these comments that Commission processes will be greatly informed by requiring CN applicants to provide additional resource adequacy and reliability planning on municipalities around the state in CN determinations. The Commission would benefit even more from a detailed dialogue on evolving metrics of resource adequacy and reliability for all future CN applications. This

new advisory group would provide necessary dialogue on energy equity considerations for CN applications in furtherance of developing a broad-based and reflective discussion of stakeholder needs beyond state-regulated utilities. In turn, this important information would assist the Commission and state with vital equity and resource adequacy metrics and data more reflective of local communities and Greater Minnesota to better inform CN applications. This advisory group would be more than a general stakeholder discussion and instead would advise the Commission on evolving needs for equity considerations and resource adequacy data metrics that have and certainly will change over time. HPUC would be an active participant in this advisory role.

CONCLUSION

HPUC thanks the Commission for the opportunity to provide these rule comments. HPUC welcomes the opportunity for further discussion of these comments at a public hearing on December 6, 2021.

Dated: November 17, 2021

Respectfully Submitted,

STINSON LLP

/s/ Lisa A. Crum

Lisa A. Crum (#0302600)
50 South Sixth Street, Suite 2600
Minneapolis, Minnesota 55402
Telephone: (612) 335-1500
lisa.crum@stinson.com

Attorneys for Hibbing Public Utilities Commission

**STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION**

*Proposed Permanent Rules Relating to Power
Plants or Lines; Revising the Certificate of
Need and Site or Route Permit Requirements;
Revisor ID R-4151*

**MPUC Docket No. - ET999, E999, IP999/R-
12-1246**

CERTIFICATE OF SERVICE

*Proposed Amendment to Rules Governing
Certificates of Need and Site and Route
Permits for Large Electric Power Plants and
High-Voltage Transmission Lines, Minnesota
Rules 7849 and 7850 and Governing Notice
Plan Filings Requirements, Minnesota Rules,
part 7929.2550; Request to Schedule a Rules
Hearing; and Request to Review Additional
Notice Plan; Including Repeal of Minn. R.
7829.2550; 7849.0230; 7849.0240; 7849.1100;
7849.1300; 7850.1600; 7850.2000; 7850.2900;
7850.3000; 7850.3100; 7850.3200; 7850.3300;
7850.3400; 7850.3500; 7850.3600; 7850.4000;
7850.4200*

**COMMENTS OF
HIBBING PUBLIC UTILITIES
COMMISSION**

The undersigned hereby certifies that true and correct copies of **Hibbing Public Utilities Commission's Initial Comments** have been served on this day by Email or U.S. Mail to the following:

NAME	ADDRESS	SERVICE
Courtney Ahlers	Courtney.ahlers@state.mn.us	Electronic
Randy Anderton	randerton@Rpu.org	Electronic
Jennifer Berquam	jberquam@mncounties.org	Electronic
Christina Brusven	cbrusven@fredlaw.com	Electronic
Board Chair	Sherburne County Board of Commissioners Sherburne County Government Center 13880 Business Center Elk River, MN 55330-1692	Paper
Jean Christoffels	jchristoffels@co.murray.mn.us	Electronic
Generic Notice – Commerce Attorneys	Commerce.attorneys@ag.state.mn.us	Electronic
Stacy Dahl	sdahl@minnkota.com	Electronic

NAME	ADDRESS	SERVICE
Richard Dornfeld	Richard.dornfeld@ag.state.mn.us	Electronic
John E. Drawz	jdrawz@fredlaw.com	Electronic
Paul Drotos	pdrotos@hotmail.com	Electronic
Jeff Edblad	Jeff.edblad@co.isanti.mn.us	Electronic
Sharon Ferguson	Sharon.ferguson@state.mn.us	Electronic
Pam Flitter	Pam.flitter@co.martin.mn.us	Electronic
Andy Geiger	Andy.geiger@co.jackson.mm.us	Electronic
David Green	David.green@co.pope.mn.us	Electronic
David Grover	dgrover@itctransco.com	Electronic
Richard J. Hettwer	Rj.hettwer@smpa.org	Electronic
Kyle Krier	Kyle.krier@co.pipestone.mn.us	Electronic
Cindy Kuismi	ckuismi@otpc.com	Electronic
Paula Maccabee	pmaccabee@justchangelaw.com	Electronic
Bruce McNamara	maclane@sleepyeyetel.net	Electronic
David Moeller	dmoeller@allete.com	Electronic
Alan Muller	alan@greendel.org	Electronic
Carol A. Overland	overland@legalectric.org	Electronic
Generic Notice – Residential Utilities Division	Residential.utilities@ag.state.mn.us	Electronic
Suzanne Rohlffing	Caraway57@aol.com	Electronic
Kenric Scheevel	Kenic.scheevel@dairylandpower.com	Electronic
Kurt Schneider	Kurt.schneider@chisagocounty.us	Electronic
Will Seuffert	Will.seuffert@state.mn.us	Electronic
Karin Sonneman	KSonneman@Co.Winona.MN.US	Electronic
Donna Stephenson	dstephenson@greenergy.com	Electronic
Lynnette Sweet	Regulatory.records@xcelenergy.com	Electronic
Cynthia Warzecha	Cynthia.warzecha@state.mn.us	Electronic
Jason Weiers	jweiers@otpc.com	Electronic
Brian Zavesky	brianz@mrenergy.com	Electronic

Dated this 17th day of November, 2021

/s/Nena L. Kuhnly
Nena L. Kuhnly