

BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

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Chair
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In the Matter of an Investigation into
Implementing Changes to the Renewable
Energy Objectives and the Newly Created
Carbon-Free Standard Under Minn. Stat.
§ 216B.1691

ISSUE DATE: September 16, 2025

DOCKET NO. E-999/CI-23-151

ORDER ON CARBON-FREE
STANDARD—CLARIFYING USE OF
CREDITS, NET MARKET
PURCHASES, AND REPORTING

PROCEDURAL HISTORY

Minnesota’s Renewable Energy Objectives, Minn. Stat. § 216B.1691, generally directs the state’s electric utilities to acquire their energy from sources that pollute less, and to demonstrate compliance by acquiring and retiring Renewable Energy Credits as discussed further below.

In 2023, Minnesota modified this statute to add a Carbon-Free Standard at Minn. Stat. § 216B.1691, subd. 2g. The revised statute directs the Commission to establish criteria for measuring an electric utility’s efforts to meet the new Carbon-Free Standard, as well as other standards within the statute.

On October 31, 2024, the Minnesota Public Utilities Commission (Commission) solicited comments on the following questions:

1. When and how should utilities report preparedness for meeting upcoming [Carbon-Free Standard] requirements?
2. By which criteria and standards should the Commission measure an electric utility’s compliance with the [Carbon-Free Standard]?
3. What considerations should the Commission take into account regarding the double counting of Renewable Energy Credits (RECs) to meet multiple requirements?
4. How should net market purchases be counted towards [Carbon-Free Standard] compliance?
5. Are there other issues or concerns related to this matter?

From January 29 to June 5, 2025, the Commission received filings from the following:

- Basin Electric Power Cooperative (Basin Electric)
- Carbon Solutions Group (CSG)
- Central Municipal Power Agency/Services (CMPAS)
- Center for Resource Solutions (CRS)
- Connexus Energy (Connexus)
- EnergyTag
- Google LLC
- Great River Energy
- Health Professionals for a Healthy Climate, Climate Generation, CURE, Minnesota Environmental Justice Table, Minnesota Interfaith and Light, MN350, and Sierra Club North Star Chapter
- International Union of Operating Engineers Local 49 and North Central States Regional Council of Carpenters
- Laborers' International Union of North America–Minnesota & North Dakota (LIUNA)
- Minnesota Center for Environmental Advocacy, Sierra Club, and Fresh Energy (collectively, Clean Energy Organizations or CEOs)
- Minnesota Department of Commerce, Division of Energy Resources (Department)
- Minnesota Large Industrial Group
- Minnesota Pollution Control Agency (MPCA)
- Minnesota Power
- Minnkota Power Cooperative (Minnkota)
- Missouri Basin Municipal Power Agency d/b/a Missouri River Energy Services (MRES)
- Midwest Renewable Energy Tracking System
- Northern States Power Company d/b/a Xcel Energy (Xcel)
- Otter Tail Power Company (Otter Tail)
- Partnership on Waste & Energy (Partnership on W&E)
- Ramsey/Washington Recycling & Energy Board (Ramsey/Washington R&E)
- Zero Lab

In addition, the Commission received a combined filing from Basin Electric, CMPAS, Connexus, East River Electric, Great River Energy, Minnesota Municipal Utilities Association, Minnesota Municipal Power Agency, Minnesota Power, Minnesota Rural Electric Association, Minnkota, MRES, Otter Tail, Rochester Public Utilities, Southern Minnesota Municipal Power Agency, and Xcel (collectively, Aligned Utilities).

On July 17, 2025, this matter came before the Commission.

FINDINGS AND CONCLUSIONS

I. Summary

In this order the Commission provides additional clarification regarding —

- The types of credits a utility may use for demonstrating compliance with the Carbon-Free Standard, and the expiration dates for those credits.
- How a utility’s purchase of wholesale energy may contribute to its compliance with the Carbon-Free Standard.
- When and how a utility must file reports related to its compliance with the Carbon-Free Standard, including the option to practice “hourly matching”—that is, reporting the retirement of credits earned in the same hour that the utility uses energy from a carbon-emitting source.

II. Background

The State of Minnesota has established a goal to reduce statewide greenhouse gas emissions across all sectors producing greenhouse gas emissions.¹ Supporting this goal, the state adopted a Carbon-Free Standard at Minn. Stat. § 216B.1691, subd. 2g, whereby —

each electric utility must generate or procure sufficient electricity generated from a carbon-free energy technology to provide the electric utility's retail customers in Minnesota, or the retail customers of a distribution utility to which the electric utility provides wholesale electric service, so that the electric utility generates or procures an amount of electricity from carbon-free energy technologies that is equivalent to at least the following standard percentages of the electric utility's total retail electric sales to retail customers in Minnesota by the end of the year indicated:

- | | |
|----------|--|
| (1) 2030 | 80 percent for public utilities; 60 percent for other electric utilities |
| (2) 2035 | 90 percent for all electric utilities |
| (3) 2040 | 100 percent for all electric utilities. |

In order to provide electricity to its retail customers, an electric utility must generate that electricity or buy “wholesale electric service” on the wholesale market—for example, by entering into a power purchase agreement with a specific seller, or buying directly from the market.

New section 1(b) defines “carbon-free” as “a technology that generates electricity without emitting carbon dioxide.” New section 2d(a) directs the Commission to issue orders to facilitate implementation of the new carbon-free standard:

- (a) The commission shall issue necessary orders detailing the criteria and standards used to: (1) measure an electric utility's efforts to meet the standards under [the Carbon-Free Standard, among other

¹ Minn. Stat. § 216H.02, subd. 1(a).

standards]; and (2) determine whether the utility is achieving the standards.

III. Credits

A. Background

Minn. Stat. § 216B.1691, subd. 4, provides for the Commission to establish a program a) authorizing the owner of a generator powered by any of the statutory “eligible energy technologies”² to earn a Renewable Energy Credit for each kilowatt-hour (kWh) produced, and b) requiring utilities subject to the Renewable Energy Objectives to demonstrate compliance by acquiring and retiring these credits.³ Specifically, subd. 4(b) states that “an electric utility may utilize renewable energy credits allowed [under the various standards within the Renewable Energy Objectives] to satisfy the standard,” even if the utility never owned the energy associated with the credits. This system of tradeable credits increases the incentive for developers to build efficient carbon-free generators, while also providing utilities with the flexibility to pursue the most competitive method of fulfilling their statutory obligations.

The Commission has issued various orders implementing this statutory provision.⁴ To facilitate trading, the Commission has ordered utilities to demonstrate compliance by using credits registered with the Midwest Renewable Energy Tracking System (M-RETS), operated by CleanCounts, which permits people who generate carbon-free energy to receive a credit⁵ for each kWh produced. M-RETS assigns a serial number to each credit, which permits people to know the facility that generated the credit, the facility’s location, and the date of generation. The Commission declared that a utility may use its credits in the year they are generated or in any of the following four years.⁶

B. Alternative Credits

Minnesota Statutes and Commission orders address how utilities may demonstrate compliance with the Renewable Energy Objectives by retiring Renewable Energy Credits. But various

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

³ *In the Matter of Commission Consideration and Determination on Compliance with Renewable Energy Obligations and Renewable Energy Standards*, Docket No. E-999/CI-03-869, Third Order Detailing Criteria and Standards for Determining Compliance Under Minn. Stat. § 216B.1691 and Setting Procedures for Retiring Renewable Energy Credits (December 4, 2008), ordering paragraphs 1 and 3.

⁴ *See, id.*

⁵ M-RETS and CleanCounts use the term “certificate” in lieu of credit—for example, Renewable Energy Certificate rather than Renewable Energy Credit.

⁶ Docket No. E-999/CI-03-869, *supra*, Order Establishing Initial Protocols for Trading Renewable Energy Credits (December 18, 2007), ordering paragraph 1.

commenters propose that the Commission also authorize utilities to demonstrate compliance through the use of alternative credits.⁷

For example, because the statutory definition of “eligible energy technology” excludes nuclear power generators, energy from nuclear power plants cannot earn Renewable Energy Credits. But because a nuclear plant arguably generates carbon-free energy,⁸ the plant can earn analogous Alternative Energy Credits, record them with M-RETS, and keep or trade them. (Some commenters use the term Environmental Attribute Credits to encompass both Renewable Energy Credits and Alternative Energy Credits.⁹) No commenter explicitly opposed this proposal.

C. Commission Action

Where a generation resource produces carbon-free energy, the Commission will recognize the alternative credits arising from that resource for use in demonstrating compliance with the Renewable Energy Objectives. Like Renewable Energy Credits, alternative credits track information about the electricity being generated, including the facility, facility location, and date of generation. These unique serialized accounting mechanisms allow the credit holder to legally claim the environmental attributes associated with the underlying energy—such as the claim that the energy is carbon-free—and prevent others from claiming the same attributes for the same kWh. Accordingly, the Commission will grant the proposal to authorize this usage.

IV. Partial Compliance

A. Background

Minn. Stat. § 216B.1691, subd. 2d(b), directs the Commission to permit utilities to demonstrate compliance with the Carbon-Free Standard by relying on sources of electricity that comply only partially with the Carbon-Free Standard:

(b) [The Commission must issue necessary orders establishing] criteria and standards that ... allow for partial compliance with [the Renewable Energy Objectives] from:

(i) electricity generated from facilities that utilize carbon-free technologies for electricity generation, but only for the percentage that is carbon-free; and

(ii) an electric utility's annual purchases from a regional transmission organization net of the electric utility's sales to the

⁷ Basin Electric, CSG, CRS, CMPAS, CEOs, Connexus, Department, EnergyTag, Great River Energy, LIUNA, M-RETS, Minnesota Power, Minnkota, MRES, OTP, Ramsey/Washington R&E, and Xcel supported this proposal.

⁸ Issues related to measuring the extent to which the energy from a generator qualifies as carbon-free under the Carbon-Free Standard are being addressed in Docket No. E-999/CI-24-352, *In the Matter of a Commission Investigation into a Fuel Life-Cycle Analysis Framework for Utility Compliance with Minnesota's Carbon-Free Standard* (the Life-Cycle Analysis Docket).

⁹ See, for example, CSG comments (January 29, 2025).

regional transmission organization, but only for the percentage of annual net purchases that is carbon-free, which percentage the commission must calculate based on the regional transmission organization's systemwide annual fuel mix or an applicable subregional fuel mix.

The statute anticipates that a utility may demonstrate compliance with the Carbon-Free Standard while relying on partially carbon-free facilities—but those details are being addressed in another docket.¹⁰ In this docket, the Commission will address how a utility may demonstrate compliance by relying on energy purchased from the wholesale market, net of the energy it sold into that market (net energy purchases).

Minnesota is served by two wholesale energy markets managed by regional transmission organization: the Midcontinent Independent System Operator, Inc. (MISO), and the Southwest Power Pool (SPP). MISO manages the markets in a region extending from the Gulf of Mexico to the Canadian province of Manitoba. SPP generally manages markets in areas west of MISO's.

To manage a wholesale market, a regional transmission organization such as MISO receives instructions from energy suppliers and energy consumers (including electric utilities) about the amount of energy that will be demanded at various points throughout the region for the following day, the amounts of energy that can be delivered to each region, and the price and other terms governing the delivery. Based on the energy being demanded and offered within each region, MISO selects the generators that will operate the following day—striving to select the least-cost resources while maintaining system reliability and pursuing other goals—and then revises these selections in real time to respond to changes.

Generators differ in the amount of carbon they emit per unit of energy generated, and the day-ahead and real-time market operations determine which generators will sell into the market at any given time. Consequently, a utility cannot know in advance precisely how much energy it will be buying and selling, and how much carbon it will be emitting.

MISO and SPP calculate the amount of carbon-free energy in their respective wholesale energy markets based on their relevant “fuel mixes.” For example, if half of the energy sold into a market comes from generators that do not emit carbon, then purchases from that market might be characterized as 50 percent carbon-free. MISO reports fuel-mix data disaggregated into regions (North, Central, South) as well as sub-regional “Local Resource Zones.” Minnesota is in MISO North. The record does not specify if SPP also calculates a fuel mix for regions or sub-regions.

Commenters disagree about the details of how to calculate “an electric utility's annual purchases from a regional transmission organization net of the electric utility's sales to the regional transmission organization, but only for the percentage of annual net purchases that is carbon-free, which percentage the commission must calculate based on the regional transmission organization's systemwide annual fuel mix or an applicable subregional fuel mix.” Specifically,

¹⁰ See the Life-Cycle Analysis Docket, *supra*.

commenters disagreed about the best method for calculating a utility's net purchases of carbon-free energy, about how to document that the energy is carbon-free, and about the appropriate region for calculating the fuel mix.

B. Whether to Require Credits When Reporting Net Market Purchases

1. Positions of the Commenters

Many commenters argue for adopting the simplest method for calculating the amount of net carbon-free energy acquired.¹¹ For example, if in a given year a utility sold 10 megawatt-hours (MWh) into the market and purchased 12 MWh from that market, the utility would have purchased 2 MWh net energy. (12 MWh bought – 10 MWh sold = 2 MWh.) If the relevant market derived 50 percent of its energy from carbon-free sources for that year, then the utility would be able to claim 1 MWh of carbon-free energy as a result of its net market purchases. (2 MWh of net purchases * 50 percent carbon-free fuel mix = 1 MWh carbon-free energy purchased.)

Other commenters argue that this method would result in utilities effectively double-counting some amount of carbon-free energy already being claimed.¹² This would result because a generator that sells carbon-free energy into a wholesale market will likely also create some variety of credits associated with that energy—credits would be available for demonstrating compliance with the Carbon-Free Standard. Thus, a utility that generated and sold 10 MWh of carbon-free energy into the market could either sell the credits associated with that energy or choose to keep the credits resulting from this generation to demonstrate 10 MWh of compliance with the Carbon-Free Standard. Either way, the credits would be accounted for, either by the utility or another entity. If that same utility bought 12 MWh from the wholesale market and the market's carbon-free fuel mix were 50 percent, that utility could claim to have acquired 2 MWh net energy, including 1 MWh of carbon-free energy—even if all the carbon-free energy in the wholesale market had already been accounted for through credits. To prevent this outcome, these commenters recommended that the Commission require utilities to acquire and retire credits for each unit of energy used for demonstrating compliance with the Carbon-Free Standard—including energy acquired from the wholesale market.

Some commenters propose limiting the scope of the problem by prohibiting a utility from demonstrating compliance with the Carbon-Free Standard by relying on carbon-free energy acquired via net-market purchases—unless the utility would be unable to demonstrate full compliance with the statute in the absence of relying on these net-market purchases.¹³

¹¹ Basin Electric, Connexus, Great River Energy, LIUNA, Minnkota, MRES, OTP, and Xcel generally support this position.

¹² CRS, CSG, Department, EnergyTag, and M-RETS generally support this position.

¹³ The Department and Xcel generally support this position

And some commenters propose that the Commission defer addressing this question until matters in a companion docket have been resolved.¹⁴ The Department proposed deferring a specific list of topics to the companion docket—including the measurement of net market purchases—and proceeding to resolve other issues in the current docket.

2. Commission Action

The Commission appreciates the concerns raised by all commenters.

To begin, the Commission will decline to defer addressing this question until the companion docket is resolved. That docket primarily addresses how a utility may calculate the amount of carbon-free energy it consumes when receiving energy from resources that are not entirely carbon-free. That is a distinct question from calculating the amount of carbon-free energy a utility consumes when its wholesale purchases exceed its wholesale sales. While there may be some overlap between these topics, the Commission does not anticipate that the resolution of the companion docket will substantially aid the resolution of issues arising from net market purchases.

Regarding the other proposals, the Commission acknowledges the advantage of adopting a formula for demonstrating compliance that is easy to administer. And the Commission acknowledges the challenge of adopting a formula that would permit a utility to claim a share of the carbon-free energy simply by making net purchases from the wholesale market—even if some other entity (or even the same utility) will own the credits related to that same energy.

Ultimately the Commission finds that this dispute is governed by statute. As previously noted, Minn. Stat. § 216B.1691, subd. 4, provides for utilities to demonstrate compliance with the Renewable Energy Objectives by acquiring and retiring credits, and the Commission has long promoted that policy. In addition, the recently adopted Minn. Stat. § 216B.1691, subd. 2d(b)(ii) expressly authorizes a utility to demonstrate compliance via net market purchases. Interpreting this statutory language to also require a utility to retire credits would render it meaningless: utilities already had the power to demonstrate compliance by retiring credits, whether or not the utility's energy came from net market purchases. The only way to give meaning to the new statutory language is to read it as establishing an additional mechanism for demonstrating compliance with the Renewable Energy Objectives, including the Carbon-Free Standard. Accordingly, the Commission will decline to require a utility to retire credits when claiming to have acquired carbon-free energy from the wholesale market.

Nevertheless, this statutory analysis does not address commenters' concerns about double-counting. This was the context in which those commenters proposed interpreting the statute to limit its scope. After due consideration, the Commission has identified a mechanism to mitigate the problem of double-counting more directly.

Specifically, the Commission will direct each utility, when calculating the percentage of net market purchases that are carbon-free under Minn. Stat. § 216B.1691, subd. 2d(b)(2)(ii), to start

¹⁴ Basin Electric, CMPAS, Connexus, and MRES generally supported awaiting the resolution of the Life-Cycle Analysis Docket (Docket No. E-999/CI-24-352), discussed *supra*.

with the average fuel mix for the relevant wholesale market, and then back out the amount of carbon-free electricity that the utility generated or procured through power purchase agreements. This formula recognizes that no utility can be expected to know how much double-counting may result when it claims to have acquired carbon-free energy from the wholesale market. But every utility knows how much carbon-free energy it sold into the market and whether it obtained credits for that energy; on this basis, the utility can calculate an adjustment to the fuel mix to avoid double-counting the carbon-free energy that it sold into the market and bought back.

To refine this further, the Commission will clarify that the calculation must reflect the fuel mix for MISO Local Resource Zones 1–7 or some other applicable regional fuel mix. MISO’s other zones—serving parts of Arkansas, Louisiana, Mississippi, and Texas—are simply too remote to have any practical bearing on the relevant fuel mix for Minnesota’s utilities. Finally, the Commission will clarify that this calculation must reflect annual data, as specified by statute.

V. Filing Requirements

The Commission directs utilities subject to the Renewable Energy Objectives to demonstrate compliance each year in Docket No. E-999/PR-YR-12 (where YR refers to the last two digits of the year the report is filed).¹⁵ The Commission has created a template form specifies the categories of information to report, and revises this form from time to time.

In the current docket, Commission staff proposed a list of filing requirements similar to filing requirements adopted for demonstrating compliance with other requirements of the Renewable Energy Objectives. designed to reveal a utility’s progress in achieving the objectives of the Carbon-Free Standard, and any obstacles. Among other things, the list would direct utilities to identify facilities deemed to be partially compliant with the Carbon-Free Standard, and the extent to which any facility’s output would be deemed carbon-free. It would also direct utilities to identify potential obstacles to achieving full compliance, including any obstacles that might justify granting an extension or waiver to a specific requirement as envisioned under the statute. Various commenters supported its proposal, or slight modifications to it.¹⁶

The Commission finds the proposed filing requirements to be generally reasonable, and so will adopt them with modifications as set forth in the ordering paragraphs below to make them correspond to reporting requirements that the Commission has approved to demonstrate compliance with other aspects of the Renewable Energy Objectives.

Among other things, the Commission will direct each utility to report on the number of credits it purchased in the prior year to comply with the Carbon-Free Standard. This information will help

¹⁵ See, for example, *supra*, Third Order Detailing Criteria and Standards for Determining Compliance Under Minn. Stat. §216B.1691 and Setting Procedures for Retiring Renewable Energy Credits (December 4, 2008), ordering paragraphs 6 and 7; Order Setting Filing Requirements and Clarifying Procedures (November 12, 2008), ordering paragraph 8; Order Finding Utilities in Compliance with Minn. Stat. § 216B.1691 and Modifying Biennial Reporting Procedures (May 28, 2013), ordering paragraph 5.

¹⁶ Basin Electric, the CEOs, CSG, LIUNA, Minnesota Power, and Xcel generally supported the Department’s proposal or some variation on it.

illustrate the extent to which a utility is generating its sufficient carbon-free energy to meet its customers' needs, and the extent to which a utility is relying on resources owned by others.

This list of reporting requirements includes references to items that are being addressed in the companion docket. To clarify, in this order the Commission is establishing *that* utilities must include this information in their annual reports to the Commission. But the specific content of the filing—including details about how to define “partially compliant with the Carbon-Free Standard,” and the extent to which any facility’s output will be deemed carbon-free—must await further development in the other docket.

Consistent with this action, the Commission will also delegate authority to its Executive Secretary to work with the Department and utilities to revise the Renewable Energy Objectives reporting template to incorporate the reporting requirements approved in this docket, modified as necessary to reflect the results of the companion docket.

VI. Hourly Matching and Credit Expiration Date

A. Positions of the Commenters

The Department initially proposed that utilities explore “hourly matching” of credits with customer demand. A utility cannot simply arrange to have enough energy over the course of a year to meet the aggregate energy demand of its customers for that year. Rather, the utility must make plans to match demand with supply on a continuous basis, for each of the 8760 hours of the year. Indeed, utilities already conduct this type of analysis when they prepare their resource plans under Minn. Stat. § 216B.2422, seeking to find the most efficient way to match supply and demand. The planning consists of identifying the utility’s existing resources, and forecasting customer demand under a variety of potential scenarios (for example, considering high economic growth, or unusually stringent regulations) to identify the utility’s optimal strategy.

Accordingly, the Department proposed that utilities explore acquiring sufficient credits to meet customer demand for each of those 8760 hours. Under this proposal, a utility would no longer be able to wait until the end of a year to determine if it has sufficient credits to match all the energy consumed by its retail customers, and then cover any shortfalls with a last-minute purchase. But in addition, the Department proposed that utilities be effectively barred from storing credits. In each hour, a utility would need to acquire any credits needed to match customer consumption for that hour—and would sell any credits that exceeded the amount needed to match customer demand for that hour. Many commenters supported some version of hourly matching.¹⁷

In addition to this proposal, or as an alternative, the Department proposed exploring the idea of gradually shortening the expiration date for credits to the year of generation. Under this proposal, a utility would not be able to acquire a surplus of credits to use in future years; rather, the utility would have to demonstrate compliance with the Carbon-Free Standard by supplying credits earned in the same year that the compliance report is filed.

¹⁷ EnergyTag, Fresh Energy, Google, MCEA, Sierra Club, and Zero Lab generally supported some version of hourly matching.

Alternatively, a group of commenters known collectively as the Aligned Utilities opposed the Department's proposals.¹⁸ They argued, among other things, that these complex matters have received insufficient development to permit an informed analysis.

Following discussions with other commenters, the Department withdrew its hourly matching proposal but continued to recommend a shorter credit expiration date and encouraged the Commission and commenters to consider these options for the future. In particular, the Department proposed that the Commission organize a workgroup to explore these and related issues—for example, to explore having utilities incorporate the use of hourly matching into the computer simulations they conduct when preparing resource plans.

B. Commission Action

Whatever the merits of hourly matching, the Commission concurs with commenters arguing that the issue is not yet ripe for consideration. Accordingly, for the present the Commission will decline to adopt any mandates regarding this issue, either in this docket or in utility resource plans. And given the press of other matters on the attention of the Commission and commenters, the Commission will likewise decline to establish a working group on this matter. Commenters are free to gather and discuss these topics on their own initiative.

The Commission will, however, direct utilities to explore how changes in the duration of credits would affect their operations. Thus, the Commission will direct each electric utility subject to the Carbon-Free Standard to discuss how the utility would use its existing and anticipated supply of credits if the Commission were to shorten the life of credits generated after 2034. Specifically, each utility must discuss the consequences if the Commission were to declare that future credits would expire after two years, and alternatively if the credits would expire after one year, and alternatively if the credits were to expire in the year in which they were generated. Each such utility must provide a discussion of the costs and benefits of these different expiration periods, including potential costs or benefits to ratepayers and impact on greenhouse gas emissions resulting from generators the utility owns or has contracted for. This filing will be due by June 1, 2026.

But to clarify, nothing in this order alters the duration of credits. For now, Renewable Energy Credits or substitute credits that have not been retired will generally remain available for demonstrating compliance with the Renewable Energy Objectives in the year generated or in any of the following four years.¹⁹

¹⁸ Basin Electric, CMPAS, Connexus, East River Electric, Great River Energy, Minnesota Municipal Utilities Association, Minnesota Municipal Power Agency, Minnesota Power, Minnesota Rural Electric Association, Minnkota, MRES, Otter Tail, Rochester Public Utilities, Southern Minnesota Municipal Power Agency, and Xcel opposed hourly matching proposals.

¹⁹ Notwithstanding this general policy, the Commission has granted a longer duration for credits earned as part of an accelerated effort to qualify for federal financial incentives; *see* Order Extending Credit Duration for Expedited Projects and Requiring Filings (August 7, 2025).

That said, if any proceeding would provide an appropriate forum to explore these issues, it would be a resource planning docket. These dockets already entail analyzing utility operations under a variety of scenarios, so they would provide an appropriate opportunity for exploring how adopting the practice of hourly matching would influence utility operations, environmental consequences, and ratepayer costs. Accordingly, the Commission will invite any utility filing a resource plan to incorporate one or more sensitivities that use an hourly matching construct to achieve the state's Carbon-Free Standard. The utility could include a discussion of the potential costs—including the costs of running the sensitivity analysis—benefits, possibilities, and limitations of a potential future hourly matching requirement.

The Commission will so order.

ORDER

1. Utilities may demonstrate compliance with the Carbon-Free Standard, Minn. Stat. § 216B.1691, subd. 2g, by retiring Renewable Energy Credits, Alternative Energy Credits, or equivalent Environmental Attribute Credits registered with the Midwest Renewable Energy Tracking System.
2. At this time, and unless otherwise specified, a utility may retire a Renewable Energy Credit, Alternative Energy Credit, and equivalent Environmental Attribute Credit in the year of generation and for four years thereafter to demonstrate compliance with the Renewable Energy Objectives.
3. To calculate the percentage of annual net market purchases that are carbon-free under Minn. Stat. § 216B.1691, subd. 2d(b)(2)(ii), each electric utility must use the average annual fuel mix associated with Local Resource Zones 1–7 of the Midcontinent Independent System Operator, Inc., or the applicable regional fuel mix, after removing from the calculation the carbon-free electricity generated directly by the utility or procured by the utility through power purchase agreements in that year. The utility need not retire credits for this purpose.
4. Electric utilities must file reports as follows:
 - A. Beginning in 2026, each electric utility must file a report each June 1st (along with its Renewable Energy Objectives compliance report in Docket No. E-999/PR-YR-12) detailing its efforts to comply with the Carbon-Free Standard.
 - 1) Specifically, the utility must report the following.
 - a) Annual Minnesota retail sales for the previous calendar year.
 - b) Annual net market purchases from the previous year.
 - c) Annual purchases of unbundled credits for the purpose of complying with the Carbon-Free Standard.

- d) Qualifying carbon-free energy procured or generated by the electric utility in the previous calendar year—including the number of facilities registered to that utility in M-RETS and the number of eligible credits that those facilities generated in the past year.
 - e) A list of facilities determined to be partially compliant with the Carbon-Free Standard, including the name of the facility, the facility’s fuel type, and the percent of that facility’s output determined to be carbon-free.
- 2) From 2026–2030, electric utilities must also report the following:
- a) The estimated amount of carbon-free generating capacity the utility would need to obtain by 2030.
 - b) The estimated carbon-free requirements, on a megawatt-hour (MWh) basis, to meet the Carbon-Free Standard in 2030.
 - c) A short summary of ongoing efforts to obtain carbon-free energy, including a brief summary of the anticipated resource mix to comply with the Carbon-Free Standard.
 - d) Any considerations, such as those outlined in Minn. Stat. § 216B.1691, subd. 2b, that may create challenges for achieving compliance, and which may allow the Commission to modify or delay implementation.
- 3) By June 1, 2026, each electric utility subject to the Carbon-Free Standard must file in this docket information about how the utility would use its existing and anticipated supply of credits if the Commission were to declare that credits generated after 2034 would expire —
- a) after two years.
 - b) after one year.
 - c) in the year generated.

Each such utility must provide a discussion of the costs and benefits of the different expiration periods noted above, including but not limited to potential costs or benefits to ratepayers and impact on greenhouse gas emissions resulting from generators the utility owns or has contracted for.

5. The Commission delegates authority to the Executive Secretary to work with the Minnesota Department of Commerce and utilities to update the Renewable Energy Objectives reporting template to incorporate the reporting requirements approved in this docket and to modify them as necessary based on the results of Docket No. E-999/CI-24-352, *In the Matter of a Commission Investigation into a Fuel Life-Cycle Analysis Framework for Utility Compliance with Minnesota’s Carbon-Free Standard*.
6. Utilities filing resource plans under Minn. Stat. § 216B.2422 may incorporate into their plans, to the extent possible, one or more sensitivities that use an hourly matching construct to achieve the state’s Carbon-Free Standard. Utilities may accompany this with a

discussion of the potential costs—including the costs of running the sensitivity analysis—benefits, possibilities, and limitations of a potential future hourly matching requirement.

7. This order takes effect immediately.

BY ORDER OF THE COMMISSION



Sasha Bergman
Executive Secretary



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CERTIFICATE OF SERVICE

I, Anne Redmond, hereby certify that I have this day, served a true and correct copy of the following document to all persons at the addresses indicated below or on the attached list by electronic filing, electronic mail, courier, interoffice mail or by depositing the same enveloped with postage paid in the United States mail at St. Paul, Minnesota.

Minnesota Public Utilities Commission
ORDER ON CARBON-FREE STANDARD—CLARIFYING USE OF CREDITS, NET
MARKET PURCHASES, AND REPORTING

Docket Number **E-999/CI-23-151**

Dated this 16th day of September, 2025

/s/ Anne Redmond

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4	Michael	Allen	michael.allen@allenergysolar.com	All Energy Solar		721 W 26th st Suite 211 Minneapolis MN, 55405 United States	Electronic Service		No	23-151Official
5	Gary	Ambach	gambach@slipstreaminc.org	Slipstream, Inc.		8973 SW Village Loop Chanhassen MN, 55317 United States	Electronic Service		No	23-151Official
6	Jay	Anderson	jaya@cmpas.org	CMPAS		7550 Corporate Way Suite 100 Eden Prairie MN, 55344 United States	Electronic Service		No	23-151Official
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	23-151Official
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	23-151Official
9	Susan	Arntz	sarntz@mankatomn.gov	City Of Mankato		P.O. Box 3368 Mankato MN, 56002-3368 United States	Electronic Service		No	23-151Official
10	Mara	Ascheman	mara.k.ascheman@xcelenergy.com	Xcel Energy		414 Nicollet Mall Fl 5 Minneapolis MN, 55401 United States	Electronic Service		No	23-151Official
11	Ray	Auginaush, Sr.	ray.auginaush@whiteearth-nsn.gov	White Earth Nation		White Earth Tribal Headquarters 35500 Eagle View Road Ogema MN, 56569 United States	Electronic Service		No	23-151Official
12	John	Aune	johna@bluehorizonsolar.com	Blue Horizon Energy		171 Cheshire Ln Ste 500 Plymouth MN, 55441 United States	Electronic Service		No	23-151Official
13	Mark	Bakk	mbakk@lcp.coop	Lake Country Power		26039 Bear Ridge Drive	Electronic Service		No	23-151Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						Cohasset MN, 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	23-151Official
15	Daniel	Becchetti	dbecchetti@grenergy.com	Great River Energy		12300 Elm Creek Boulevard Maple Grove MN, 55369 United States	Electronic Service		No	23-151Official
16	Todd	Beck	tbeck@grenergy.com			null null, null United States	Electronic Service		No	23-151Official
17	Brian	Bell	bell.brian@dorsey.com	Dorsey & Whitney LLP		50 South Sixth St. Suite 1500 Minneapolis MN, 55402 United States	Electronic Service		Yes	23-151Official
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	23-151Official
19	David	Bender	dbender@earthjustice.org	Earthjustice		1001 G Street NW Suite 1000 Washington DC, 20001 United States	Electronic Service		No	23-151Official
20	Melanie	Benjamin	melanie.benjamin@millelacsband.com			43408 Oodena Drive Onamia MN, 56359 United States	Electronic Service		No	23-151Official
21	Sasha	Bergman	sasha.bergman@state.mn.us		Public Utilities Commission	121 7th PI E Ste 350 Saint Paul MN, 55101-2147 United States	Electronic Service		No	23-151Official
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	23-151Official
23	Laura	Bishop	laura.bishop@state.mn.us		Minnesota Pollution Control Agency	520 Lafayette Rd Saint Paul MN, 55155 United States	Electronic Service		No	23-151Official
24	William	Black	bblack@mmua.org	MMUA		Suite 200 3131 Fernbrook Lane North Plymouth MN, 55447 United States	Electronic Service		No	23-151Official
25	Hunter	Boldt	hunterboldt@redlakenation.org	Red Lake Nation		15484 Migizi Drive Red Lake MN, 56671 United States	Electronic Service		No	23-151Official
26	Peter	Boney	pboney@boisforte-nsn.gov	Bois Forte Band of Chippewa		Bois Forte Tribal Government 5344	Electronic Service		No	23-151Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
38	John	Bucknell		Virtus Solis Technologies, Inc.		1511 Pebble Point Drive Troy MI, 48085 United States	Paper Service		No	23-151Official
39	Robert	Budreau	robert.budreau@llojibwe.net	Leech Lake Band of Ojibwe		190 Sailstar Drive NW Cass Lake MN, 56633 United States	Electronic Service		No	23-151Official
40	Brian	Burandt	brian.burandt@connexusenergy.com	Connexus Energy		14601 Ramsey Blvd Ramsey MN, 55303 United States	Electronic Service		No	23-151Official
41	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	23-151Official
42	Richard	Burud	rgburud@msn.com	Southern Minnesota Energy Cooperative		31110 Cooperative Way Rushford MN, 55971 United States	Electronic Service		No	23-151Official
43	Jennifer	Cady	jjcady@mnpower.com	Minnesota Power		30 W Superior St Duluth MN, 55802 United States	Electronic Service		No	23-151Official
44	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	23-151Official
45	Thomas	Carlson	thomas.carlson@edf-re.com	EDF Renewable Energy		10 2nd St NE Ste. 400 Minneapolis MN, 55413 United States	Electronic Service		No	23-151Official
46	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	23-151Official
47	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	23-151Official
48	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	23-151Official
49	Marc	Child	mchild@grenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	23-151Official
50	Michael	Childs, Jr.	michael.childsjr@piic.org	Prairie Island Indian Community		Prairie Island Indian Community 5636 Sturgeon Lake Road Welch MN,	Electronic Service		No	23-151Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						55089 United States				
51	Ray	Choquette	rchoquette@agp.com	Ag Processing Inc.		12700 West Dodge Road PO Box 2047 Omaha NE, 68103-2047 United States	Electronic Service		No	23-151Official
52	Steve W.	Chriss	stephen.chriss@walmart.com	Wal-Mart		2001 SE 10th St. Bentonville AR, 72716-5530 United States	Electronic Service		No	23-151Official
53	John	Coffman	john@johncoffman.net	AARP		871 Tuxedo Blvd. St. Louis MO, 63119-2044 United States	Electronic Service		No	23-151Official
54	Kenneth A.	Colburn	kcolburn@symbioticstrategies.com	Symbiotic Strategies, LLC		26 Winton Road Meredith NH, 32535413 United States	Electronic Service		No	23-151Official
55	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	23-151Official
56	Jean	Comstock	jean.comstock.dbcc@gmail.com	St. Paul 350		729 6th St E St. Paul MN, 55106 United States	Electronic Service		No	23-151Official
57	Christopher	Cooper	chris.cooper@resource-solutions.org			1012 Torney Avenue San Francisco CA, 94129 United States	Electronic Service		No	23-151Official
58	Hillary	Creurer	hcreurer@allete.com	Minnesota Power		30 W Superior St Duluth MN, 55802 United States	Electronic Service		No	23-151Official
59	George	Crocker	gwillc@nawo.org	North American Water Office		5093 Keats Avenue Lake Elmo MN, 55042 United States	Electronic Service		No	23-151Official
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	23-151Official
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	23-151Official
62	Stacy	Dahl	sdahl@minnkota.com	Minnkota Power Cooperative, Inc.		5301 32nd Ave S Grand Forks ND, 58201 United States	Electronic Service		No	23-151Official
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	23-151Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
64	Lorene	Damsits	lorened@cmpasgroup.org	Central MN MPA		459 S Grove St Blue Earth MN, 56013 United States	Electronic Service		No	23-151Official
65	Lisa	Daniels	lisadaniels@windustry.org	Windustry		201 Ridgewood Ave Minneapolis MN, 55403 United States	Electronic Service		No	23-151Official
66	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	23-151Official
67	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	23-151Official
68	Rob	Davis	rob@mrets.org	M-RETS		60 S 6th Street Suite 2800 Minneapolis MN, 55402 United States	Electronic Service		No	23-151Official
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	23-151Official
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	23-151Official
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	23-151Official
72	Curt	Dieren	curt.dieren@dgr.com	L&O Power Cooperative		1302 S Union St Rock Rapids IA, 51246 United States	Electronic Service		No	23-151Official
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	23-151Official
74	Becky	Dobbs	bdobbs@grenergy.com			null null, null United States	Electronic Service		No	23-151Official
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	23-151Official
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	23-151Official
77	Jeremy	Duehr	jduehr@fredlaw.com	Fredrikson & Byron, P.A.		60 S Sixth St Ste 1500 Minneapolis MN, 55402-4400 United States	Electronic Service		No	23-151Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
78	Adam	Duininck	aduininck@ncsrcc.org	North Central States Regional Council of Carpenters		700 Olive Street St. Paul MN, 55130 United States	Electronic Service		No	23-151Official
79	Kristin W	Duncanson	kw.duncanson@gmail.com			57746 Highway 30 Mapleton MN, 56065 United States	Electronic Service		No	23-151Official
80	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	23-151Official
81	Kevin	Dupuis, Sr.	kevindupuis@fdlrez.com			Reservation Business Committee 1720 Big Lake Rd Cloquet MN, 55720 United States	Electronic Service		No	23-151Official
82	Brian	Edstrom	briane@cubminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota St Ste W1360 Saint Paul MN, 55101 United States	Electronic Service		No	23-151Official
83	Jamie	Edwards	jamie.edwards@millelacsband.com	Mille Lacs Band of Ojibwe		43408 Oodena Drive Onamia MN, 56358 United States	Electronic Service		No	23-151Official
84	Kristen	Eide Tollefson	healingsystems69@gmail.com	R-CURE		28477 N Lake Ave Frontenac MN, 55026-1044 United States	Electronic Service		No	23-151Official
85	Michael	Fairbanks	michael.fairbanks@whiteearth-nsn.gov	White Earth Reservation Business Committee		PO Box 418 White Earth MN, 56591 United States	Electronic Service		No	23-151Official
86	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	23-151Official
87	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	23-151Official
88	Terri	Finn	terri.goggleye@llojibwe.net			null null, null United States	Electronic Service		No	23-151Official
89	Mike	Fiterman	mikefiterman@libertydiversified.com	Liberty Diversified International		5600 N Highway 169 Minneapolis MN, 55428-3096 United States	Electronic Service		No	23-151Official
90	Christine	Fox	cfox@itasca-mantrap.com	Itasca-Mantrap Coop. Electric Assn.		PO Box 192 Park Rapids MN, 56470 United States	Electronic Service		No	23-151Official
91	Lucas	Franco	lfranco@liunagroc.com	LIUNA		81 Little Canada Rd E Little Canada MN, 55117 United States	Electronic Service		No	23-151Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
92	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	23-151Official
93	Nathan	Franzen	nathan@nationalgridrenewables.com	Geronimo Energy, LLC		8400 Normandale Lake Blvd Ste 1200 Bloomington MN, 55437 United States	Electronic Service		No	23-151Official
94	Gary	Frazer	gfrazier@mnchippewatribe.org	Minnesota Chippewa Tribe		PO Box 217 Cass Lake MN, 55633 United States	Electronic Service		No	23-151Official
95	Barb	Freese	bfreese@mncenter.org	Minnesota Center for Environmental Advocacy		1919 University Ave W Ste 515 Saint Paul MN, 55104-3435 United States	Electronic Service		No	23-151Official
96	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	23-151Official
97	Stacey	Fujii	sfujii@grenergy.com	Great River Energy		12300 Elm Creek Boulevard Maple Grove MN, 55369-4718 United States	Electronic Service		No	23-151Official
98	Jessica	Fyhrie	jfyhrie@otpc.com	Otter Tail Power Company		PO Box 496 Fergus Falls MN, 56538-0496 United States	Electronic Service		Yes	23-151Official
99	Edward	Garvey	garveyed@aol.com	Residence		32 Lawton St Saint Paul MN, 55102 United States	Electronic Service		No	23-151Official
100	Benjamin	Gerber	ben@mrets.org	Midwest Renewable Energy Tracking System		60 South Sixth Street Suite 2800 Minneapolis MN, 55402 United States	Electronic Service		No	23-151Official
101	David P.	Geschwind	dp.geschwind@smmpa.org	Southern Minnesota Municipal Power Agency		500 First Avenue SW Rochester MN, 55902 United States	Electronic Service		No	23-151Official
102	Shannon	Geshick	shannon.geshick@state.mn.us	Minnesota Indian Affairs Council (MIAC)		null null, null United States	Electronic Service		No	23-151Official
103	Allen	Gleckner	gleckner@fresh-energy.org	Fresh Energy		408 St. Peter Street Ste 350 Saint Paul MN, 55102 United States	Electronic Service		No	23-151Official
104	Jenny	Glumack	jenny@mrea.org	Minnesota Rural Electric Association		11640 73rd Ave N Maple Grove MN, 55369 United States	Electronic Service		No	23-151Official
105	Julie	Goehring	julie@redriverbasincommission.org			708 70 Ave NW Moorhead MN, 56560 United States	Electronic Service		No	23-151Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
106	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	23-151Official
107	Tessa	Haagenson	tessa.haagenson@connexusenergy.com	Connexus Energy		14601 Ramsey Blvd NW Ramsey MN, 55303 United States	Electronic Service		No	23-151Official
108	Jeffrey	Haase	jhaase@grenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	23-151Official
109	Hal	Halpern	halhalpern@clpower.com	Cooperative Light & Power		1554 Hwy 2 P0 Box 69 Two Harbors MN, 55616 United States	Electronic Service		No	23-151Official
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	23-151Official
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	23-151Official
112	James	Hartson				59931 300th Street Waltham MN, 55982 United States	Paper Service		No	23-151Official
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	23-151Official
114	Erik	Hatlestad	erik@cureriver.org			117 1st St Montevideo MN, 56265 United States	Electronic Service		No	23-151Official
115	Kim	Havey	kim.havey@minneapolismn.gov	City of Minneapolis		350 South 5th Street, Suite 315M Minneapolis MN, 55415 United States	Electronic Service		No	23-151Official
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	23-151Official
117	Adam	Heinen	aheinen@dakotaelectric.com	Dakota Electric Association		4300 220th St W Farmington MN, 55024 United States	Electronic Service		No	23-151Official
118	Annete	Henkel	mui@mutilityinvestors.org	Minnesota Utility Investors		413 Wacouta Street #230 St.Paul MN, 55101 United States	Electronic Service		No	23-151Official
119	Jessy	Hennesy	jessy.hennesy@avantenergy.com	Avant Energy		220 S. Sixth St. Ste 1300 Minneapolis	Electronic Service		No	23-151Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						MN, 55402 United States				
120	Kristin	Henry	kristin.henry@sierraclub.org	Sierra Club		2101 Webster St Ste 1300 Oakland CA, 94612 United States	Electronic Service		No	23-151Official
121	Benjamin	Hertz	bhertz@bepc.com	Basin Electric Power Cooperative		1717 E Interstate Ave Bismarck ND, 58503 United States	Electronic Service		Yes	23-151Official
122	Holly	Hinman	holly.r.hinman@xcelenergy.com	Xcel Energy		414 Nicollet Mall, 7th Floor Minneapolis MN, 55401 United States	Electronic Service		No	23-151Official
123	Joe	Hoffman	ja.hoffman@smmpa.org	SMMPA		500 First Ave SW Rochester MN, 55902-3303 United States	Electronic Service		No	23-151Official
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	23-151Official
125	Ronald	Horman	rhorman@redwoodelectric.com	Redwood Electric Cooperative		60 Pine Street Clements MN, 56224 United States	Electronic Service		No	23-151Official
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	23-151Official
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	23-151Official
128	John	Ihle	ljihle@rrt.net	PlainStates Energy LLC		27451 S Hwy 34 Barnesville MN, 56514 United States	Electronic Service		No	23-151Official
129	Annie	Jackson	cheryl.jackson@whiteearth-nsn.gov	White Earth Nation		White Earth Tribal Headquarters 35500 Eagle View Road Ogemo MN, 56569 United States	Electronic Service		No	23-151Official
130	Faron	Jackson, Sr.	faron.jackson@llojibwe.net			190 Sailstar Drive NW Cass Lake MN, 56633 United States	Electronic Service		No	23-151Official
131	Casey	Jacobson	cjacobson@bepc.com	Basin Electric Power Cooperative		1717 East Interstate Avenue Bismarck ND, 58501 United States	Electronic Service		No	23-151Official
132	Justin	Jahnz	justin.jahnz@ecemn.com	East Central Energy		412 Main Ave N Braham MN, 55006 United States	Electronic Service		No	23-151Official

[illegible]

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
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	23-151Official
148	Nazir	Khan	nazir@mnejtable.org	Minnesota Environmental Justice Table		2720 E 22nd St Minneapolis MN, 55406 United States	Electronic Service		No	23-151Official
149	Hudson	Kingston	hudson@curemn.org			PO Box 712 Ely MN, 55731 United States	Electronic Service		No	23-151Official
150	Kate	Knuth	kate.knuth@gmail.com			2347 14th Terrace NW New Brighton MN, 55112 United States	Electronic Service		No	23-151Official
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	23-151Official
152	Brian	Kolbinger	brian@beckertownship.org	Becker Township Board		PO Box 248 12165 Hancock St Becker MN, 55308 United States	Electronic Service		No	23-151Official
153	Seth	Koneczny	st.koneczny@smmpa.org	SMMPA		500 First Avenue, SW Rochester MN, 55902-3303 United States	Electronic Service		No	23-151Official
154	Brian	Krambeer	bkrambeer@mienergy.coop	MiEnergy Cooperative		PO Box 626 31110 Cooperative Way Rushford MN, 55971 United States	Electronic Service		No	23-151Official
155	Randy	Kramer	rlkramer89@gmail.com	Water and Soil Resources Board		42808 Co. Rd. 11 Bird Island MN, 55310 United States	Electronic Service		No	23-151Official
156	Allen	Krug	allen.krug@xcelenergy.com	Xcel Energy		414 Nicollet Mall-7th fl Minneapolis MN, 55401 United States	Electronic Service		No	23-151Official
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	23-151Official
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	23-151Official
159	Therese	LaCanne	tlacanne@greenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	23-151Official
160	Matthew	Lacey	mlacey@greenergy.com	Great River Energy		12300 Elm Creek Boulevard Maple Grove MN, 55369-4718 United States	Electronic Service		No	23-151Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
161	Becky	Lammi	cityclerk@ci.aurora.mn.us	City of Aurora		16 W 2nd Ave N PO Box 160 Aurora MN, 55705 United States	Electronic Service		No	23-151Official
162	Carmel	Laney	carmel.laney@stoel.com	Stoel Rives LLP		33 South Sixth Street Suite 4200 Minneapolis MN, 55402 United States	Electronic Service		No	23-151Official
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	23-151Official
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	23-151Official
165	Emily	Larson	elarson@duluthmn.gov	City of Duluth		411 W 1st St Rm 403 Duluth MN, 55802 United States	Electronic Service		No	23-151Official
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	23-151Official
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	23-151Official
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	23-151Official
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	23-151Official
170	Dan	Leshner	dlesher@greenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	23-151Official
171	Annie	Levenson Falk	annief@cupminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota Street, Suite W1360 St. Paul MN, 55101 United States	Electronic Service		No	23-151Official
172	Jesse	Levine	jesse_levine@afandpa.org			1101 K St NW Suite 700 Washington DC, 20005 United States	Electronic Service		No	23-151Official
173	Amy	Liberkowsky	amy.a.liberkowsky@xcelenergy.com	Xcel Energy		414 Nicollet Mall 7th Floor Minneapolis MN, 55401-1993 United States	Electronic Service		No	23-151Official
174	Eric	Lindberg	elindberg@mncenter.org	Minnesota Center for		1919 University Avenue West	Electronic Service		No	23-151Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
				Environmental Advocacy		Suite 515 Saint Paul MN, 55104-3435 United States				
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	23-151Official
176	Michelle	Lommel	mlommel@greenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	23-151Official
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	23-151Official
178	Nicole	Luckey	nluckey@invenergyllc.com	Invenergy LLC		1 S. Wacker Suite 1800 Chicago IL, 60606 United States	Electronic Service		No	23-151Official
179	Susan	Ludwig	sludwig@mnpower.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	23-151Official
180	Robert	Lunder	robert.lunder@mdu.com	Montana-Dakota Utilities (ET)		400 N 4th St Bismark ND, 58501 United States	Electronic Service		No	23-151Official
181	Alice	Madden	alice@communitypowermn.org	Community Power		2720 E 22nd St Minneapolis MN, 55406 United States	Electronic Service		No	23-151Official
182	Scott	Magnuson	smagnuson@bpu.org	Brainerd Public Utilities		8027 Highland Scenic Rd Baxter MN, 56425 United States	Electronic Service		No	23-151Official
183	Kavita	Maini	kmaini@wi.rr.com	KM Energy Consulting, LLC		961 N Lost Woods Rd Oconomowoc WI, 53066 United States	Electronic Service		No	23-151Official
184	Christine	Marquis	regulatory.records@xcelenergy.com	Xcel Energy		414 Nicollet Mall MN1180-07-MCA Minneapolis MN, 55401 United States	Electronic Service		No	23-151Official
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	23-151Official
186	Mary	Martinka	mary.a.martinka@xcelenergy.com	Xcel Energy Inc		414 Nicollet Mall 7th Floor Minneapolis MN, 55401 United States	Electronic Service		No	23-151Official
187	Gregg	Mast	gmast@cleanenergyeconomymn.org	Clean Energy Economy Minnesota		4808 10th Avenue S Minneapolis MN, 55417 United States	Electronic Service		No	23-151Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
188	Shena	Matrious	shena.matrious@millelacsband.com	Mille Lacs Band of Ojibwe		43408 Oodena Drive Onamia MN, 56349 United States	Electronic Service		No	23-151Official
189	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	23-151Official
190	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	23-151Official
191	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	23-151Official
192	April	McCormick	aprlm@grandportage.com	Grand Portage Band of Lake Superior Chippewa		PO Box 428 Grand Portage MN, 55605 United States	Electronic Service		No	23-151Official
193	Jess	McCullough	jmccullough@mnpower.com	Minnesota Power		30 W Superior St Duluth MN, 55802 United States	Electronic Service		No	23-151Official
194	Sara G	McGrane	smcgrane@felhaber.com	Felhaber Larson		220 S 6th St Ste 2200 Minneapolis MN, 55420 United States	Electronic Service		No	23-151Official
195	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	23-151Official
196	Harvey	McMahon	hcmahon@otpc.com	Otter Tail Power Company		215 South Cascade Street Fergus Falls MN, 56537 United States	Electronic Service		No	23-151Official
197	Taylor	McNair	taylor@gridlab.org			668 Capp Street San Francisco CA, 94110 United States	Electronic Service		No	23-151Official
198	Ronald	Meier	rmeier@mcleodcoop.com	Mcleod Cooperative Power		3515 11th St East Glencoe MN, 55336 United States	Electronic Service		No	23-151Official
199	Melanie	Mesko Lee	melanie.lee@burnsvillemn.gov	City of Burnsville		100 Civic Center Parkway Burnsville MN, 55337-3867 United States	Electronic Service		No	23-151Official
200	Peder	Mewis	pmewis@cleangridalliance.org	Clean Grid Alliance		570 Asbury St. St. Paul MN, 55104 United States	Electronic Service		No	23-151Official
201	Joseph	Meyer	joseph.meyer@ag.state.mn.us		Office of the Attorney General -	Bremer Tower, Suite 1400	Electronic Service		No	23-151Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
					Residential Utilities Division	445 Minnesota Street St Paul MN, 55101-2131 United States				
202	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	23-151Official
203	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	23-151Official
204	Stacy	Miller	stacy.miller@minneapolismn.gov	City of Minneapolis		350 S. 5th Street Room M 301 Minneapolis MN, 55415 United States	Electronic Service		No	23-151Official
205	David	Moeller	dmoeller@allete.com	Minnesota Power			Electronic Service		No	23-151Official
206	Dalene	Monsebroten	dalene.monsebroten@nmpagency.com	Northern Municipal Power Agency		123 2nd St W Thief River Falls MN, 56701 United States	Electronic Service		No	23-151Official
207	Sarah	Mooradian	sarah@curemn.org	CURE		117 South 1st Street Montevideo MN, 56265 United States	Electronic Service		No	23-151Official
208	Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP		33 South Sixth St Ste 4200 Minneapolis MN, 55402 United States	Electronic Service		No	23-151Official
209	Travis	Morrison	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	23-151Official
210	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	23-151Official
211	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	23-151Official
212	Alan	Muller	alan@greendel.org	Energy & Environmental Consulting		1110 West Avenue Red Wing MN, 55066 United States	Electronic Service		No	23-151Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
213	Sonny	Myers	smyers@1854treatyauthority.org	1854 Treaty Authority		4428 Haines Rd Duluth MN, 55811-1524 United States	Electronic Service		No	23-151Official
214	Ben	Nelson	benn@cmpasgroup.org	CMPMPA		459 South Grove Street Blue Earth MN, 56013 United States	Electronic Service		No	23-151Official
215	Carl	Nelson	cnelson@mncee.org	Center for Energy and Environment		212 3rd Ave N Ste 560 Minneapolis MN, 55401 United States	Electronic Service		No	23-151Official
216	Deb	Nelson	dnelson@greenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	23-151Official
217	David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency		220 South Sixth Street Suite 1300 Minneapolis MN, 55402 United States	Electronic Service		No	23-151Official
218	Duane	Ninneman	duane@cureriver.org	Clean Up the River Environment		117 South 1st St Montevideo MN, 56265 United States	Electronic Service		No	23-151Official
219	Michael	Noble	noble@fresh-energy.org	Fresh Energy		408 Saint Peter St Ste 350 Saint Paul MN, 55102 United States	Electronic Service		No	23-151Official
220	Rolf	Nordstrom	rnordstrom@gpisd.net	Great Plains Institute		2801 21ST AVE S STE 220 Minneapolis MN, 55407-1229 United States	Electronic Service		No	23-151Official
221	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	23-151Official
222	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	23-151Official
223	Ric	O'Connell	ric@gridlab.org	GridLab		2120 University Ave Berkeley CA, 94704 United States	Electronic Service		No	23-151Official
224	Joseph	OBrien	joey.obrien@lowersioux.com			39527 Highway 1 Morton MN, 56270 United States	Electronic Service		No	23-151Official
225	Matthew	Olsen	molsen@otpc.com	Otter Tail Power Company		215 South Cascade Street Fergus Falls MN, 56537 United States	Electronic Service		No	23-151Official
226	Russell	Olson	rolson@hcpd.com	Heartland Consumers Power District		PO Box 248 Madison SD, 57042-0248 United States	Electronic Service		No	23-151Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
227	Debra	Opatz	dopatz@otpc.com	Otter Tail Power Company		215 South Cascade Street Fergus Falls MN, 56537 United States	Electronic Service		No	23-151Official
228	Mikayla	Osterman	mosterman@otpc.com	Otter Tail Power Company		215 S Cascade St PO Box 496 Fergus Falls MN, 56537 United States	Electronic Service		No	23-151Official
229	Jamie	Overgaard	jovergaard@minnkota.com	Minnkota Power Cooperative, Inc.		5301 32nd Ave S Grand Forks ND, 58201 United States	Electronic Service		No	23-151Official
230	Carol A.	Overland	overland@legalelectric.org	Legalelectric - Overland Law Office		1110 West Avenue Red Wing MN, 55066 United States	Electronic Service		No	23-151Official
231	Gregory	Padden	gpadden@greenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	23-151Official
232	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	23-151Official
233	Marsha	Parlow	mparlow@greenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	23-151Official
234	Priti	Patel	ppatel@greenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369-4718 United States	Electronic Service		No	23-151Official
235	Gerad	Paul	gpaul@minnkota.com	Minnkota Power Cooperative		5301 32nd Ave S Grand Forks ND, 58201 United States	Electronic Service		No	23-151Official
236	Earl	Pendleton	earl.pendleton@lowersioux.com	Lower Sioux Indian Community		39527 Highway 1 Morton MN, 56270 United States	Electronic Service		No	23-151Official
237	Mary Beth	Peranteau	mperanteau@fredlaw.com	Fredrikson & Byron, P.A.		44 East Mifflin Street Suite 1000 Madison WI, 53703 United States	Electronic Service		No	23-151Official
238	Thom	Petersen	thom.petersen@state.mn.us		Minnesota Department of Agriculture	625 North Robert St Saint Paul MN, 55155 United States	Electronic Service		No	23-151Official
239	Luke	Peterson	luke.peterson@hpuc.com	Hibbing Public Utilities Commission		1902 Sixth Ave E Hibbing MN, 55746 United States	Electronic Service		No	23-151Official
240	Neil	Peterson	info@nclucb.org	Northern Counties Land Use Coordinating Board		null null, null United States	Electronic Service		No	23-151Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
241	Gordon	Pietsch	gpietsch@grenergy.com	Great River Energy		12300 Elm Creek Blvd. Maple Grove MN, 55369-4718 United States	Electronic Service		No	23-151Official
242	Joe	Plumer	joe.plumer@redlakenation.org	Red Lake Nation		15484 Migizi Drive Red Lake MN, 56671 United States	Electronic Service		No	23-151Official
243	J.	Porter	greg.porter@nngco.com	Northern Natural Gas Company		1111 South 103rd St Omaha NE, 68124 United States	Electronic Service		No	23-151Official
244	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	23-151Official
245	Robert	Prescott	bob.prescott@lowersioux.com	Lower Sioux Indian Community		39527 Highway 1 Morton MN, 56270 United States	Electronic Service		No	23-151Official
246	David	Raatz	draatz@bepc.com	Basin Electric Power Cooperative		1717 East Interstate Avenue Bismarck ND, 58501 United States	Electronic Service		No	23-151Official
247	John C.	Reinhardt		Laura A. Reinhardt		3552 26th Ave S Minneapolis MN, 55406 United States	Paper Service		No	23-151Official
248	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	23-151Official
249	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	23-151Official
250	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	23-151Official
251	John	Richards	johnrichards@nweco.com	Northwestern Wisconsin Electric Company		104 S. Pine St. Grantsburg WI, 54840 United States	Electronic Service		No	23-151Official
252	Susan	Romans	sromans@allete.com	Minnesota Power		30 West Superior Street Legal Dept Duulth MN, 55802 United States	Electronic Service		No	23-151Official
253	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	23-151Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
267	Kathleen	Schuler	keschuler47@gmail.com			1520 10th Ave S #2 Minneapolis MN, 55404 United States	Electronic Service		No	23-151Official
268	Robert H.	Schulte	rhs@schulteassociates.com	Schulte Associates LLC		1742 Patriot Rd Northfield MN, 55057 United States	Electronic Service		No	23-151Official
269	J.P.	Schumacher	jps@mrenergy.com	Missouri River Energy Services		null null, null United States	Electronic Service		No	23-151Official
270	Kevin	Schumacher	kevin@mrets.org	Midwest Renewable Energy Tracking System		null null, null United States	Electronic Service		No	23-151Official
271	Ronald J.	Schwartau	rschwartau@noblesce.com	Nobles Electric Cooperative		22636 U.S. Hwy. 59 Worthington MN, 56187 United States	Electronic Service		No	23-151Official
272	Douglas	Seaton	doug.seaton@umwlc.org	Upper Midwest Law Center		8421 Wayzata Blvd Ste 300 Golden Valley MN, 55426 United States	Electronic Service		No	23-151Official
273	Dean	Sedgwick	sedgwick@itascapower.com	Itasca Power Company		PO Box 455 Spring Lake MN, 56680 United States	Electronic Service		No	23-151Official
274	Jessie	Seim	jessie.seim@piic.org	Prairie Island Indian Community		5636 Sturgeon Lake Rd Welch MN, 55089 United States	Electronic Service		No	23-151Official
275	Darrell	Seki, Sr.	dseki@redlakenation.org			15484 Migizi Drive Red Lake MN, 56671 United States	Electronic Service		No	23-151Official
276	Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates		7400 Lyndale Ave S Ste 190 Richfield MN, 55423 United States	Electronic Service		Yes	23-151Official
277	Bria	Shea	bria.e.shea@xcelenergy.com	Xcel Energy		414 Nicollet Mall Minneapolis MN, 55401 United States	Electronic Service		No	23-151Official
278	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	23-151Official
279	Doug	Shoemaker	dougs@charter.net	Minnesota Renewable Energy		2928 5th Ave S Minneapolis MN, 55408 United States	Electronic Service		No	23-151Official
280	Beth	Smith	bsmith@greatermankato.com	Greater Mankato Growth		1961 Premier Dr Ste 100 Mankato MN, 56001 United States	Electronic Service		No	23-151Official
281	Joel	Smith	jsmith@mnchippewatribe.org	Minnesota Chippewa Tribe		PO Box 217 Cass Lake MN, 56633 United States	Electronic Service		No	23-151Official
282	Joshua	Smith	joshua.smith@sierraclub.org			85 Second St FL 2	Electronic Service		No	23-151Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						San Francisco CA, 94105 United States				
283	Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.		76 W Kellogg Blvd St. Paul MN, 55102 United States	Electronic Service		No	23- 151Official
284	Nizhoni	Smith	nizhoni.smith@lowersioux.com	Lower Sioux Indian Community		PO Box 308 39527 Reservation Highway 1 Morton MN, 56270 United States	Electronic Service		No	23- 151Official
285	Trevor	Smith	trevor.smith@avantenergy.com	Avant Energy, Inc.		220 South Sixth Street Suite 1300 Minneapolis MN, 55402 United States	Electronic Service		No	23- 151Official
286	Roger	Smith, Sr.	rogermsmithsr@fdlrez.com			1720 Big Lake Road Cloquet MN, 55720 United States	Electronic Service		No	23- 151Official
287	Beth	Soholt	bsoholt@cleangridalliance.org	Clean Grid Alliance		570 Asbury Street Suite 201 St. Paul MN, 55104 United States	Electronic Service		No	23- 151Official
288	Anna	Sommer	asommer@energyfuturesgroup.com	Energy Futures Group		PO Box 692 Canton NY, 13617 United States	Electronic Service		No	23- 151Official
289	Marie	Spry	mariespry@grandportage.com			PO Box 428 Grand Portage MN, 55605 United States	Electronic Service		No	23- 151Official
290	Mark	Spurr	mspurr@fvbenergy.com	International District Energy Association		222 South Ninth St., Suite 825 Minneapolis MN, 55402 United States	Electronic Service		No	23- 151Official
291	LeRoy	Staples Fairbanks III	leroy.fairbanks@llojibwe.net	Leech Lake Band of Ojibwe		190 Sailstar Drive NW Cass Lake MN, 56633 United States	Electronic Service		No	23- 151Official
292	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	23- 151Official
293	Byron E.	Starns	byron.starns@stinson.com	STINSON LLP		50 S 6th St Ste 2600 Minneapolis MN, 55402 United States	Electronic Service		No	23- 151Official
294	Cary	Stephenson	cstephenson@otpc.com	Otter Tail Power Company		215 South Cascade Street Fergus Falls MN, 56537 United States	Electronic Service		Yes	23- 151Official
295	Mark	Strohfus	mstrohfus@greenergy.com	Great River Energy		12300 Elm Creek Boulevard Maple Grove MN, 55369- 4718 United States	Electronic Service		No	23- 151Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
296	James M	Strommen	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered		150 S 5th St Ste 700 Minneapolis MN, 55402 United States	Electronic Service		No	23-151Official
297	Samuel	Strong	sam.strong@redlakenation.org	Red Lake Nation		15484 Migizi Drive Red Lake MN, 56671 United States	Electronic Service		No	23-151Official
298	Kent	Sulem	ksulem@mmua.org			3131 Fernbrook Ln N Ste 200 Plymouth MN, 55447-5337 United States	Electronic Service		No	23-151Official
299	Timothy	Sullivan	tsullivan@whe.org	Wright Hennepin Coop. Electric Assn.		6800 Electric Drive PO Box 330 Rockford MN, 55373 United States	Electronic Service		No	23-151Official
300	David	Sunderman	daves@benco.org	BENCO (DUPLICATE)		PO Box 8 Mankato MN, 56002-0008 United States	Electronic Service		No	23-151Official
301	Randy	Synstelién	rsynstelién@otpcó.com	Otter Tail Power Company		215 S Cascade St Fergus Falls MN, 56537 United States	Electronic Service		No	23-151Official
302	Camille	Tanhoff	kamip@uppersiouxcommunity-nsn.gov	Upper Sioux Community		5722 Travers Lane PO BOX 147 Granite Falls MN, 56241 United States	Electronic Service		No	23-151Official
303	Mikayala	Thompson	mmthompson@otpcó.com	Otter Tail Power Company		null null, null United States	Electronic Service		No	23-151Official
304	Tim	Thompson	tthompson@lrec.coop	Lake Region Electric Cooperative		PO Box 643 1401 South Broadway Pelican Rapids MN, 56572 United States	Electronic Service		No	23-151Official
305	Stuart	Tommerdahl	stommerdahl@otpcó.com	Otter Tail Power Company		215 S Cascade St PO Box 496 Fergus Falls MN, 56537 United States	Electronic Service		Yes	23-151Official
306	Pat	Treseler	pat.jcplaw@comcast.net	Paulson Law Office LTD		4445 W 77th Street Suite 224 Edina MN, 55435 United States	Electronic Service		No	23-151Official
307	Lise	Trudeau	lise.trudeau@state.mn.us		Department of Commerce	85 7th Place East Suite 500 Saint Paul MN, 55101 United States	Electronic Service		No	23-151Official
308	Caralyn	Trutna	carrie@uppersiouxcommunity-nsn.gov	Upper Sioux Community		Upper Sioux Community P.O. Box 147 Granite Falls MN, 55372 United States	Electronic Service		No	23-151Official
309	Jackie	Van Norman	jvannorman@grenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	23-151Official

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310	Analeisha	Vang	avang@mnpower.com			30 W Superior St Duluth MN, 55802-2093 United States	Electronic Service		Yes	23-151Official
311	Adrian	Varga	avarga@actcommodities.com	ACT Commodities		437 Madison Ave New York City NY, 10022 United States	Electronic Service		No	23-151Official
312	Sam	Villella	sdvillella@gmail.com			10534 Alamo Street NE Blaine MN, 55449 United States	Electronic Service		No	23-151Official
313	Julie	Voeck	julie.voeck@nee.com	NextEra Energy Resources, LLC		700 Universe Blvd Juno Beach FL, 33408 United States	Electronic Service		No	23-151Official
314	Amelia	Vohs	avohs@mncenter.org	Minnesota Center for Environmental Advocacy		1919 University Avenue West Suite 515 St. Paul MN, 55104 United States	Electronic Service		Yes	23-151Official
315	Michael	Volker	mvolker@eastriver.coop	East River Electric Power Coop		211 S. Harth Ave Madison SD, 57042 United States	Electronic Service		No	23-151Official
316	Toni	Volkmeier	toni.volkmeier@state.mn.us	MPCA		520 Lafayette Rd. N. St. Paul MN, 55155 United States	Electronic Service		No	23-151Official
317	Trent	Waite	twaite@grenergy.com			null null, null United States	Electronic Service		No	23-151Official
318	Laurance R	Waldoch	larrywaldoch@gmail.com	Attorney		2597 Parkview Dr Saint Paul MN, 55110 United States	Electronic Service		No	23-151Official
319	Greg	Wannier	greg.wannier@sierraclub.org	Sierra Club		2101 Webster St Ste 1300 Oakland CA, 94612 United States	Electronic Service		No	23-151Official
320	Roger	Warehime	roger.warehime@owatonnautilities.com	Owatonna Municipal Public Utilities - Gas		208 S Walnut Ave PO BOX 800 Owatonna MN, 55060 United States	Electronic Service		No	23-151Official
321	Cynthia	Warzecha	cynthia.warzecha@state.mn.us	Minnesota Department of Natural Resources		500 Lafayette Road Box 25 St. Paul MN, 55155-4040 United States	Electronic Service		No	23-151Official
322	Elizabeth	Wefel	eawefel@flaherty-hood.com	Missouri River Energy Services		525 Park St Ste 470 Saint Paul MN, 55103 United States	Electronic Service		No	23-151Official
323	Carol	Westergard	cwestergard@otpc.com	Otter Tail Power Company		215 S Cascade St Fergus Falls MN, 56537 United States	Electronic Service		No	23-151Official
324	Heather	Westra	heather.westra@pic.org	Prairie Island Indian Community		5636 Sturgeon Lake Rd Welch MN,	Electronic Service		No	23-151Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						55089 United States				
325	Paul	White	paul.white@prcwind.com	Project Resources Corp./Tamarac Line LLC/Ridgewind		618 2nd Ave SE Minneapolis MN, 55414 United States	Electronic Service		No	23-151Official
326	Steve	White	steve.white@llojibwe.net	Leech Lake Band of Ojibwe		190 Sailstar Drive NW Cass Lake MN, 56633 United States	Electronic Service		No	23-151Official
327	Cody	Whitebear	cody.whitebear@piic.org	Prairie Island Indian Community		5636 Sturgeon Lake Road Welch MN, 55089 United States	Electronic Service		No	23-151Official
328	John	Williams	jwilliams@grenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	23-151Official
329	Laurie	Williams	laurie.williams@sierraclub.org	Sierra Club		Environmental Law Program 1536 Wynkoop St Ste 200 Denver CO, 80202 United States	Electronic Service		No	23-151Official
330	Virgil	Wind	virgil.wind@millelacsband.com	Mille Lacs Band of Ojibwe		43408 Oodena Drive Onamia MN, 56359 United States	Electronic Service		No	23-151Official
331	Joseph	Windler	jwindler@winthrop.com	Winthrop & Weinstine		225 South Sixth Street, Suite 3500 Minneapolis MN, 55402 United States	Electronic Service		No	23-151Official
332	Robyn	Woeste	robynwoeste@alliantenergy.com	Interstate Power and Light Company		200 First St SE Cedar Rapids IA, 52401 United States	Electronic Service		No	23-151Official
333	Sara	Wolff	sara@mnipl.org			710 Linwood Avenue St Paul MN, 55105 United States	Electronic Service		No	23-151Official
334	Tim	Wulling	t.wulling@earthlink.net			1495 Raymond Ave. Saint Paul MN, 55108 United States	Electronic Service		No	23-151Official
335	Laurie	York	laurie.york@whiteearth-nsn.gov	White Earth Reservation Business Committee		PO Box 418 White Earth MN, 56591 United States	Electronic Service		No	23-151Official
336	Kurt	Zimmerman	kwz@ibew160.org	Local Union #160, IBEW		2909 Anthony Ln St Anthony Village MN, 55418-3238 United States	Electronic Service		No	23-151Official
337	Emily	Ziring	eziring@stlouispark.org	City of St. Louis Park		5005 Minnetonka Blvd St. Louis Park MN, 55416 United States	Electronic Service		No	23-151Official
338	Patrick	Zomer	pat.zomer@lawmoss.com	Moss & Barnett PA		150 S 5th St #1200	Electronic Service		No	23-151Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						Minneapolis MN, 55402 United States				