

August 27, 2025

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

RE: Comments of the Minnesota Department of Commerce
Docket No. E015/CN-25-111

Dear Mr. Bull:

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

*In the Matter of the Application for a Certificate of Need for the Iron Range
– St. Louis County – Arrowhead 345 kV Transmission Line Project: Request
for Exemptions.*

The Petition was filed by ALLETE, Inc. d/b/a Minnesota Power and American Transmission Company LLC on August 7, 2025.

The Department recommends **approval with modifications** and is available to answer any questions the Minnesota Public Utilities Commission may have.

Sincerely,

/s/ Dr. SYDNIE LIEB
Assistant Commissioner of Regulatory Analysis

SR/ar
Attachment

Before the Minnesota Public Utilities Commission

Comments of the Minnesota Department of Commerce

Docket No. E015/CN-25-111

I. INTRODUCTION

ALLETE, Inc. d/b/a Minnesota Power (MP) and American Transmission Company LLC by and through its corporate manager ATC Management Inc. (ATC) (collectively, the Applicants) submitted a petition requesting certain exemptions to data requirements be approved by the Minnesota Public Utilities Commission (Commission) pursuant to Minn. R. 7849.0200, subp. 6.¹ The Exemption Petition is intended to tailor the data provided by the Applicants in a future certificate of need petition they intend to make.

In a future filing the Applicants will be requesting a certificate of need for the Iron Range – St. Louis County – Arrowhead 345 kV Transmission Project (ISA Project). The Applicants intend to submit a combined application for a Certificate of Need and a Route Permit to construct the ISA Project pursuant to Minn. Stat. §§ 216B.243 and 216I.05 in the fourth quarter of 2025.

The proposed ISA Project was studied, reviewed, and approved by the Midcontinent Independent System Operator, Inc. (MISO) as part of its Long-Range Transmission Planning (LRTP) Tranche 2.1 portfolio of projects included in the 2024 MISO Transmission Expansion Plan (MTEP24). The Applicants state that the proposed ISA Project is needed to enhance grid reliability in the Upper Midwest.

II. PROCEDURAL BACKGROUND

August 7, 2025	MP and ATC filed the Exemption Petition, seeking approval of a data exemptions for a future certificate of need (CN) petition for the ISA Project.
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August 19, 2025	The Commission issued a Notice of Comment Periods. ²
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¹ *In the Matter of the Application for a Certificate of Need for the Iron Range – St. Louis County – Arrowhead 345 kV Transmission Line Project*, MP and ATC, Exemption Petition, August 7, 2025, Docket No. E015/CN-25-111, (eDockets), [20258-221879-01](#), (hereinafter “Exemption Petition”).

² *In the Matter of the Application for a Certificate of Need for the Iron Range – St. Louis County – Arrowhead 345 kV Transmission Line Project*, Commission, Notice of Comment Periods, August 19, 2025, Docket No. E015/CN-25-111, (eDockets), [20258-222214-01](#), (hereinafter “Notice”).

According to the Notice, the following topic is open for comment:

- *Should the Commission grant the exemptions to the certificate of need application content requirements as requested by the Applicants' in their August 7, 2025 filing?*

III. DEPARTMENT ANALYSIS

A. GOVERNING STATUTES AND RULES

The Applicants filed the Exemption Petition pursuant to Minn. R. 7849.0200, subp. 6, which states, in part:

Before submitting an application, a person is exempted from any data requirement of parts 7849.0010 to 7849.0400 if the person (1) requests an exemption from specified rules, in writing to the commission, and (2) shows that the data requirement is unnecessary to determine the need for the proposed facility or may be satisfied by submitting another document. A request for exemption must be filed at least 45 days before submitting an application.

Based on this standard, the Commission may grant exemptions when the data requirements are shown to be unnecessary to determine need or can be satisfied by submitting alternative information. In the Petition, the Applicants request to be exempted from certain data requirements of Minn. R. 7849.0010 to 7849.0400.

B. REQUESTED EXEMPTIONS

The Exemption Petition requests exemptions from the following requirements:

- Minn. R. 7849.0240 subp. 2(B)—Promotional Activities;
- Minn. R. 7849.0260 C(5)—Effect of Project on Rates Systemwide;
- Minn. R. 7849.0260 A(3) and C(6)—Losses;
- Minn. R. 7849.0260 D—System Map;
- Minn. R. 7849.0260 B(4) and (8)—Transmission Lines with Different Terminals or Substations;
- Minn. R. 7849.0270, subps. 1-6—Peak Demand and Annual Consumption Forecast and System Revenue Requirements;
- Minn. R. 7849.0280—System Capacity;
- Minn. R. 7849.0290—Conservation;
- Minn. R. 7849.0300—Consequences of Delay; and
- Minn. R. 7849.0340—No Facility Alternative.

In addition, the Applicants note that the ATC Arrowhead 345 kV/230 kV Substation is subject to an 800 megavolt-amp (MVA) limitation per a Minnesota Environmental Quality Board (MEQB) permitting exception issued in March 2001. The Applicants claim this limitation would need to be removed to facilitate the ISA Project as developed by MISO. Therefore, the Applicants request that the 800 MVA issue be moved to and resolved in this docket.³

The Department examines each exemption request separately. The required criterion is whether the Applicants have shown that “the data requirement is unnecessary to determine the need for the proposed facility or may be satisfied by submitting another document” as discussed above. The Department notes that similar exemptions were approved recently by the Commission in proceedings for other transmission lines resulting from the MISO’s LRTP process, which is also the source of the proposed ISA Project.⁴

C. ANALYSIS OF EXEMPTION REQUESTS

C.1. 7849.0240 subp. 2(B)

Minn. R. 7849.0240, subp. 2(B) requires that a Certificate of Need application contain “an explanation of the relationship of the proposed facility to . . . promotional activities that may have given rise to the demand for the facility.” Minn. R. 7849.0010, subp. 24 defines promotional practices as meaning “any action or policies by an applicant, except those actions or policies that are permitted or mandated by statute or rule, which directly or indirectly give rise to the demand for the facility, including but not limited to advertising, billing practices, promotion of increased use of electrical energy, and other marketing activities.”

The Applicants request that the Commission grant ATC an exemption from this data requirement. In this case ATC does not directly serve end-users of electric service and does not engage in promotional activities that could give rise to the need for the proposed Project. MP would provide its relevant data. The Applicants also note that this request is consistent with several prior exemption requests approved by the Commission.⁵

³ As part of this request the Applicants propose to provide notice of this issue to parties in Docket Nos. E015/AI-11-75 and E015/PA-04-2020.

⁴ For examples see: *In the Matter of the Application of Minnesota Power and Great River Energy for a Certificate of Need for the Northland Reliability Project 345 kV Transmission Line, Order Approving Requested Exemptions and Notice Plan*, June 21, 2023, Docket No. E015, ET2/CN-22-416, (eDockets) [20236-196704-01](#); *In the Matter of the Application for a Certificate of Need for the Big Stone South – Alexandria – Big Oaks Transmission Project, Order*, April 19, 2023, Docket No. E017, ET2, E002, ET10, E015/CN-22-538, (eDockets) [20234-194943-01](#).

⁵ The Applicants cite the following precedents: *In the Matter of Application of Xcel Energy and ITC Midwest, LLC for the Huntley-Wilmarth 345 kV Transmission Line Project*, Commission, Order on Exemption Request, September 1, 2017, Docket No. E002, E6675/CN-17-184, (eDockets) [20179-135212-01](#). *In the Matter of the Application of Prairie Rose Wind, LLC for*

The Department agrees with the Applicants that the Commission's past practice is to exempt non-load serving entities from the data requirement regarding promotional practices. Therefore, the Department recommends that the Commission approve the requested exemption from Minn. R. 7849.0240, subp. 2(B) for ATC.

C.2. Minn. R. 7849.0260 C(5)

Minn. R. 7849.0260 C(5) requires that an application for a CN for a transmission line must include data regarding the "effect on rates systemwide and in Minnesota, assuming a test year beginning with the proposed in-service date."

The Applicants request that the Commission grant ATC an exemption from this data requirement. MP would provide its relevant data. ATC requests an exemption from this requirement because it is not a Minnesota public utility whose rates are regulated by the Commission. As a transmission-only utility, ATC's rates are regulated by the Federal Energy Regulatory Commission and the prices for providing transmission service are governed by the MISO tariff. The Applicants state that information regarding the expected Project cost, the multi-value project (MVP) cost allocation methodology, and the share that will be allocated to Minnesota utilities' load would be more useful in evaluating the Project, and as such, ATC will provide its relevant data as substitute information.

The Department agrees with the Applicants that, for ATC, the data most closely approximating the required information would be the alternative data proposed by ATC. Therefore, the Department recommends that the Commission approve the requested exemption from Minn. R. 7849.0260 C(5) for ATC with provision of the proposed alternative data.

C.3. Minn. R. 7849.0260 A(3) and C(6)

Minn. R. 7849.0260 A(3) requires an applicant to provide "the expected losses under projected maximum loading and under projected average loading in the length of the transmission line and at the terminals or substations." Minn. R. 7849.0260 C(6) requires an applicant to provide "its efficiency, expressed for a transmission facility as the estimated losses under projected maximum loading and under projected average loading in the length of the transmission line and at the terminals or substations."

Certificate of Need for up to 200 MW wind project in Rock and Pipestone Counties, Commission, Order Approving Exemption Petition, May 14, 2010, Docket No. IP6838/CN-10-80, (eDockets) [20105-50463-01](#). *In the Matter of the Application of Goodhue Wind for a Certificate of Need for a 78 MW Wind Project and Associated Facilities in Goodhue County*, Commission, Order Finding Application Complete and Initiating Informal Review Process, December 30, 2009, Docket No. IP6701 /CN-09-1186, (eDockets) [200912-45523-01](#).

The Applicants request an exemption from Minn. R. 7849.0260 A(3) and C(6). The Applicants propose to provide system losses information in lieu of line-specific losses required by the rules.

The Department agrees with the Applicants that the requested exemptions are consistent with several prior exemption requests approved by the Commission in other Certificate of Need transmission line dockets and is more relevant to the analysis.⁶ Therefore, the Department recommends that the Commission approve the requested exemption from Minn. R. 7849.0260 A(3) and C(6) with the provision of the proposed alternative data.

C.4. Minn. R. 7849.0260 D

Minn. R. 7849.0260 D requires a map showing the applicant's system or load center to be served by the proposed project.

The Applicants request an exemption from Minn. R. 7849.0260 D for ATC only. ATC requests an exemption because a transmission-only company such as ATC does not directly serve load. ATC proposes to submit a map showing ATC's network of transmission lines in Minnesota and Wisconsin.

The Department agrees that a map showing ATC's transmission network is the relevant information. The Department recommends that the Commission approve the requested exemption from Minn. R. 7849.0260 D for ATC with the provision of the proposed alternative data.

C.5. Minn. R. 7849.0260 B(4) and (8)

Minn. R. 7849.0260 B(4) requires the Applicants provide "a discussion of the availability of alternatives to the facility, including but not limited to: [...] transmission lines with different terminals or substations." Minn. R. 7849.0260 B(8) requires the Applicants provide "a discussion of the availability of alternatives to the facility, including but not limited to: [...] any reasonable combinations of the alternatives listed in subitems (1) to (7)."

The Applicants note that Minn. Stat. § 216B.243, subd. 3(6) states in part that "the commission must not require evaluation of alternative end points for a high-voltage transmission line qualifying as a large energy facility unless the alternative end points are (i) consistent with end points identified in a

⁶ The Applicants cite the following examples; *In the Matter of the Application of Minnesota Power and Great River Energy for a Certificate of Need for the Northland Reliability Project 345 kV Transmission Line*, Commission, Order Approving Requested Exemptions and Notice Plan, June 21, 2023, Docket No. E015, ET2/CN-22-416, (eDockets) [20236-196704-01](#). *In re Application of Minnesota Power for a Certificate of Need for the Duluth Loop Reliability Project in St. Louis Cnty.*, Commission, Order Approving Notice Plan and Granting Variances and Exemptions, May 17, 2021, Docket No. E015/CN-21-140, (eDockets) [20215-174194-01](#).

federally registered planning authority transmission plan, or (ii) otherwise agreed to for further evaluation by the applicant.” In this case the Applicants have proposed end points that are consistent with MISO’s and do not consent to alternative end points.

The Department agrees with the Applicants that Minnesota Statutes limit the consideration of alternative end points in this matter and, therefore, an exemption is appropriate. The Department recommends that the Commission approve the requested exemption from Minn. R. 7849.0260 B(4) and (8).

C.6. Minn. R. 7849.0270, subps. 1-6

Minn. R. 7849.0270 subps. 1-6 contains data requirements related to forecasting peak demand and annual electrical consumption. In general, the rule requires forecast data regarding an applicant’s entire service area and system.

The Applicants state that the proposed Project is intended to:

- support the reliability of the regional transmission system, particularly in northern Minnesota and northwest Wisconsin;
- provide additional transmission capacity and regional transfer capacity to reliably integrate new renewable generation;
- meet growing electrical demand across the region; and
- strengthen the regional transmission grid.

Based upon these needs the Applicants propose to provide MP’s “most recent AFR (advanced forecast report) filed on July 1, 2025 in Docket No. E999/PR-25-11.”⁷ In addition, the Applicants propose to provide a “discussion of the different regional demand scenarios evaluated in the analysis used by MISO to justify the Project.”⁸ The Applicants’ claim is that the substitute information is better tailored to the need for the ISA Project. Throughout the discussion the Applicants note numerous dockets where the Commission has approved similar exemptions.⁹

The Department agrees that the information used by MISO when assessing the proposed Project would be more appropriate to assess need in this case than the information required by the rule. Therefore, the Department recommends that the Commission approve the requested exemption to Minnesota Rules 7849.0270 subparts 1 to 6 with the provision of the proposed alternative data.

⁷ Exemption Petition at 8.

⁸ Exemption Petition at 9.

⁹ Exemption Petition at 8-10.

C.7. Minn. R. 7849.0280

Minnesota Rules 7849.0280 requires an applicant for a CN to provide information that describes the ability of its existing system to meet forecasted demand; in essence, load and capability information.

The Applicants request that the Commission grant an exemption from Minn. R. 7849.0280. The Applicants note that the Commission has previously granted exemption requests from parts of Minn. R. 7849.0280 in several other transmission line Certificate of Need dockets where issues of transmission adequacy, rather than generation adequacy, were at issue.¹⁰

The Department agrees with the Applicants that the Commission has approved exemptions to Minn. R. 7849.0280, subps. (B) through (I) in similar circumstances. In essence, the Applicant's request the addition of Minn. R. 7849.0280, subp. (A) to the exemptions granted in the past. Minn. R. 7849.0280, subp. (A) requires "a brief discussion of power planning programs, including criteria, applied to the applicant's system and to the power pool or area within which the applicant's planning studies are based."

The information regarding power pool planning criteria could be of value in evaluating the proposed ISA Project. Therefore, the Department recommends that the Commission modify the requested exemption and approve the requested exemption to Minn. R. 7849.0280, subps. (B) through (I) only.¹¹

C.8. Minn. R. 7849.0290

Minn. R. 7849.0290 requires various information be provided on an applicant's energy conservation and efficiency programs.

MP proposes to provide a summary of MP's Integrated Resource Plan and Conservation Improvement Plan filings. ATC requests a full exemption from Minn. R. 7849.0290. In addition to MP's information, the Applicants will also provide information regarding how conservation and energy efficiency was considered by MISO in its evaluation of the proposed ISA Project.

¹⁰ The Applicants cite the following examples; *In re Application of Minnesota Power for a Certificate of Need for the Duluth Loop Reliability Project in St. Louis Cnty.*, Commission, Order Approving Notice Plan and Granting Variances and Exemptions, May 17, 2021, Docket No. E015/CN-21-140, (eDockets) [20215-174194-01](#); *In re Application of Great River Energy and Minnesota Power for a Certificate of Need for the Menahga Area 115 kV Transmission Line Project in Hubbard, Wadena and Becker Counties, Minnesota*, Commission, Order Approving Exemption Request, December 3, 2014, Docket No. E015/CN-14-787, [201412-105142-01](#); *In re Application of Great River Energy and Minnesota Power for a Certificate of Need for a 115 kV High Voltage Transmission Line in St. Louis and Carlton Counties*, Commission, Order Approving Exemptions and Proposed Provision of Alternative Data, November 2, 2010, Docket No. E015, ET2/CN-10-973, [201011-56126-01](#).

¹¹ Note that the Commission did not grant a requested exemption to subpart A of the rule in Docket No. E015/CN-21-140, the Department's recommendation here is consistent with the precedent.

The Department agrees with the Applicants that, as ATC does not have end-use customers, a full exemption is appropriate for ATC. The Department also agrees with the Applicants that the Commission has approved exemptions to Minn. R. 7849.0290 for MP. The most relevant data is how MISO considered energy efficiency in determining the need for the proposed ISA Project. This information will better inform the record as to the need for the proposed ISA Project than the required information.

The Department recommends that the Commission approved the requested exemption to Minn. R. 7849.0290 with provision of the proposed alternative data.

C.9. Minn. R. 7849.0300 and 7849.0340

Minn. R. 7849.0300 requires an applicant for a CN to provide detailed information regarding the consequences of delay at three specific, statistically-based levels of demand and energy consumption. Minn. R. 7849.0340 requires an applicant for a CN to provide detailed information regarding the no build alternative at the same three statistically-based levels of demand and energy consumption.

The Applicants state they “will discuss the consequences of delay and a no build alternative in its application, there is no need to discuss these items in terms of three levels of demand.” In addition, the Applicants note that the Commission has approved similar partial exemption requests from the requirements of Minn. R. 7849.0300 and 7849.0340 in other transmission line Certificate of Need dockets.¹²

The Department agrees with the Applicants that information on the consequences of delay and a no build alternative tied to three specific, statistically-based levels of demand and energy consumption is not likely to be a useful part of the analysis for the proposed ISA Project and that a general discussion is appropriate; as noted in the Exemption Petition, similar exemptions were approved in other transmission CNs. Therefore, the Department recommends that the Commission approve the requested exemption to Minnesota Rules 7849.0300 and 7849.0340 with the provision of the proposed alternative data.

¹² The Applicants cite the following examples; *In re Application of Minnesota Power for a Certificate of Need for the Duluth Loop Reliability Project in St. Louis Cnty.*, Commission, Order Approving Notice Plan and Granting Variances and Exemptions, May 17, 2021, Docket No. E015/CN-21-140, (eDockets) [20215-174194-01](#); *In re Application of Great River Energy and Minnesota Power for a Certificate of Need for the Menahga Area 115 kV Transmission Line Project in Hubbard, Wadena and Becker Counties, Minnesota*, Commission, Order Approving Exemption Request, December 3, 2014, Docket No. E015/CN-14-787, [201412-105142-01](#); *In re Request of Minnesota Power for a Certificate of Need for the Great Northern Transmission Line*, Commission, Order Approving Notice Plan, Granting Variance Request, and Approving Exemption Request, February 28, 2013, Docket No. E015/CN-12-1163, (eDockets) [20132-84248-01](#); *In the Matter of the Application of Northern States Power Company d/b/a Xcel Energy and Great River Energy for a Certificate of Need for the Upgrade of the Southwest Twin Cities (SWTC) Chaska Area 69 kV Transmission Line to 115 kV Capacity*, Commission, Order Granting the Company's Exemption Request, November 4, 2011, Docket No. E002/CN-11-826, [201111-68102-01](#).

D. 800 MVA LIMIT

The final issue in the Exemption Petition regards the 800 MVA limit placed by the MEQB in a March 2001 order granting a permitting exemption to MP for the construction of the Arrowhead – Weston 345 kV transmission line and the ATC Arrowhead 345 kV/230 kV Substation. The Applicants note that the permissions were later transferred to ATC in 2005 in Docket No. E015/PA-04-2020.¹³

As designed by MISO, the ISA Project would result in power flowing through the ATC Arrowhead 345/230 kV Substation into Wisconsin that would exceed 800 MVA. Therefore, the Applicants intend to request that the Commission remove the MEQB 800 MVA limit on power flow through the ATC Arrowhead 345/230 kV Substation. Regarding this future request, the Applicants recommend providing notice of the request to remove the 800 MVA limit via filing summary not only to the persons required under Minn. R. 7849 but also to the parties in Docket Nos. E015/AI-11-75 and E015/PA-04-2020.

The Department agrees with the Applicants that, since siting energy facilities has been moved to the Commission and the information regarding the impact of the ISA Project on the 800 MVA limit will be available in this docket, this docket is the correct place to review any issues regarding modifying or eliminating the 800 MVA limit. However, no Commission action is necessary; the Applicants can make any requests in their forthcoming CN petition that they deem advisable. The Department also agrees with the Applicants that, if a request to modify or eliminate the 800 MVA limit is made, the Commission should require additional notice.

The Department recommends that the Commission require the Applicants to provide notice of the request to change or remove the 800 MVA limit via filing summary not only to the persons required under Minn. R. 7849 but also to the parties in Docket Nos. E015/AI-11-75 and E015/PA-04-2020.

IV. DEPARTMENT RECOMMENDATIONS

Based on analysis of the information in the record, the Department has prepared recommendations, which are provided below. The recommendations correspond to the subheadings of Section III above.

¹³ See *In the Matter of Minnesota Power's Petition for Review of an Agreement Between Minnesota Power and American Transmission Company*, Commission, Order Approving Transfer Subject to Conditions, Requiring Further Filings, and Denying Reconsideration of Earlier Order on the Merits, December 2, 2005, Docket No. E015/M-04-2020, (eDockets) [2542187](#).

C. ANALYSIS OF EXEMPTION REQUESTS

- C.1. *The Department recommends that the Commission approve the requested exemption from Minn. R. 7849.0240, subp. 2(B) for ATC.*
- C.2. *The Department recommends that the Commission approve the requested exemption from Minn. R. 7849.0260 C(5) for ATC with provision of the proposed alternative data.*
- C.3. *The Department recommends that the Commission approve the requested exemption from Minn. R. 7849.0260 A(3) and C(6) with the provision of the proposed alternative.*
- C.4. *The Department recommends that the Commission approve the requested exemption from Minn. R. 7849.0260 D for ATC with the provision of the proposed alternative data.*
- C.5. *The Department recommends that the Commission approve the requested exemption from Minn. R. 7849.0260 B(4) and (8).*
- C.6. *The Department recommends that the Commission approve the requested exemption to Minnesota Rules 7849.0270 subparts 1 to 6 with the provision of the proposed alternative data.*
- C.7. *The Department recommends the Commission modify the requested exemption and approve the requested exemption to Minn. R. 7849.0280, subps. (B) through (I) only.*
- C.8. *The Department recommends that the Commission approved the requested exemption to Minn. R. 7849.0290 with provision of the proposed alternative data.*
- C.9. *The Department recommends that the Commission approve the requested exemption to Minnesota Rules 7849.0300 and 7849.0340 with the provision of the proposed alternative data.*

D. 800 MVA LIMIT

- *The Department recommends that the Commission require the Applicants to provide notice of the request to change or remove the 800 MVA limit via filing summary not only to the persons required under Minn. R. 7849 but also to the parties in Docket Nos. E015/AI-11-75 and E015/PA-04-2020.*

CERTIFICATE OF SERVICE

I, Sharon Ferguson, hereby certify that I have this day, served copies of the following document on the attached list of persons by electronic filing, certified mail, e-mail, or by depositing a true and correct copy thereof properly enveloped with postage paid in the United States Mail at St. Paul, Minnesota.

Minnesota Department of Commerce
Comments on Exemption Request

Docket No. E015/CN-25-111

Dated this **27th** day of **August 2025**

/s/Sharon Ferguson

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25	Alan	Jenkins	aj@jenkinsatlaw.com	Jenkins at Law		2950 Yellowtail Ave. Marathon FL, 33050 United States	Electronic Service		No	CN-25-111
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33	Eric	Lipman	eric.lipman@state.mn.us		Office of Administrative Hearings	PO Box 64620 St. Paul MN, 55164-0620 United States	Electronic Service		No	CN-25-111
34	Susan	Ludwig	sludwig@mnpower.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	CN-25-111
35	Kavita	Maini	kmaini@wi.rr.com	KM Energy Consulting, LLC		961 N Lost Woods Rd Oconomowoc WI, 53066 United States	Electronic Service		No	CN-25-111
36	Joseph	Meyer	joseph.meyer@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	Bremer Tower, Suite 1400 445 Minnesota Street St Paul MN, 55101-2131 United States	Electronic Service		No	CN-25-111
37	Stacy	Miller	stacy.miller@minneapolismn.gov	City of Minneapolis		350 S. 5th Street Room M 301 Minneapolis MN, 55415 United States	Electronic Service		No	CN-25-111
38	David	Moeller	dmoeller@allete.com	Minnesota Power			Electronic Service		No	CN-25-111
39	Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP		33 South Sixth St Ste 4200	Electronic Service		No	CN-25-111

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						Minneapolis MN, 55402 United States				
40	David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency		220 South Sixth Street Suite 1300 Minneapolis MN, 55402 United States	Electronic Service		No	CN-25- 111
41	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	CN-25- 111
42	Ellen	Nowak	ellen.nowak@wisconsin.gov	Public Service Commission of Wisconsin		4822 Madison Yards Way Madison WI, 53707 United States	Electronic Service		No	CN-25- 111
43	Matthew	Olsen	molsen@otpc.com	Otter Tail Power Company		215 South Cascade Street Fergus Falls MN, 56537 United States	Electronic Service		No	CN-25- 111
44	Carol A.	Overland	overland@legalelectric.org	Legalelectric - Overland Law Office		1110 West Avenue Red Wing MN, 55066 United States	Electronic Service		No	CN-25- 111
45	Greg	Palmer	gpalmer@greatermngas.com	Greater Minnesota Gas, Inc.		1900 Cardinal Ln PO Box 798 Faribault MN, 55021 United States	Electronic Service		No	CN-25- 111
46	Jennifer	Peterson	jjpeterson@mnpower.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	CN-25- 111
47	Catherine	Phillips	catherine.phillips@wecenergygroup.com	Minnesota Energy Resources		231 West Michigan St Milwaukee WI, 53203 United States	Electronic Service		No	CN-25- 111
48	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	CN-25- 111
49	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	CN-25- 111
50	Susan	Romans	sromans@allete.com	Minnesota Power		30 West Superior Street Legal Dept Duulth MN, 55802 United States	Electronic Service		No	CN-25- 111
51	Elizabeth	Schmiesing	eschmiesing@winthrop.com	Winthrop & Weinstine, P.A.		225 South Sixth Street Suite 3500 Minneapolis	Electronic Service		No	CN-25- 111

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54	Peggy	Sorum	peggy.sorum@centerpointenergy.com	CenterPoint Energy		505 Nicollet Mall Minneapolis MN, 55402 United States	Electronic Service		No	CN-25-111
55	Byron E.	Starns	byron.starns@stinson.com	STINSON LLP		50 S 6th St Ste 2600 Minneapolis MN, 55402 United States	Electronic Service		No	CN-25-111
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13	Jayme	Trusty	execdir@swrdc.org	SWRDC		2401 Broadway Ave #1 Slayton MN, 56172 United States	Electronic Service		No	CN - CERTIFICATE OF NEEDS
14	Jen	Tyler	tyler.jennifer@epa.gov	US Environmental Protection Agency		Environmental Planning & Evaluation Unit 77 W Jackson Blvd. Mailstop B-19J Chicago IL, 60604-3590 United States	Electronic Service		No	CN - CERTIFICATE OF NEEDS
15	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	CN - CERTIFICATE OF NEEDS
16	Alan	Whipple	sa.property@state.mn.us		Minnesota Department Of Revenue	Property Tax Division 600 N. Robert Street St. Paul MN, 55146-3340 United States	Electronic Service		No	CN - CERTIFICATE OF NEEDS
17	Jonathan	Wolfgram	jonathan.wolfgram@state.mn.us		Office of Pipeline Safety	445 Minnesota St Ste 147 Woodbury MN, 55125 United States	Electronic Service		No	CN - CERTIFICATE OF NEEDS