



414 Nicollet Mall
Minneapolis, MN 55401

November 12, 2025

Sasha Bergman
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101

—Via Electronic Filing—

RE: REPLY COMMENTS
APPROVAL OF PPAs FOR FIRM DISPATCHABLE RESOURCES
DOCKET NOS. E002/CN-23-212, E002/RP-24-67, E002/M-24-195

Dear Ms. Bergman:

Northern States Power Company, doing business as Xcel Energy, submits the enclosed Reply Comments to the Minnesota Public Utilities Commission responding to the October 31, 2025 Comments of the Department of Energy, Division of Energy Resources, the Office of the Attorney General—Residential Utilities Division and Invenergy Renewables LLC pursuant to the Commission's October 2, 2025 Notice of Comment Period in the above-referenced dockets.

Attachment A to this filing is marked "Not-Public" as it contains information the Company considers to be trade secret data as defined by Minn. Stat. § 13.37(1)(b). This data includes confidential negotiation details, pricing and other contractual terms. The information has independent economic value from not being generally known to, and not being readily ascertainable by, other parties who could obtain economic value from its disclosure or use. Attachment A is marked "Not-Public" in its entirety. Pursuant to Minn. R. 7829.0500, subp. 3, the Company provides the following description of the excised material:

1. **Nature of the Material:** Attachment A is a PDF copy of an agreement between the Company and Seller for purchases of power to produce electric service.
2. **Authors:** The agreement was drafted by Company's and Seller's legal and business development personnel.
3. **Importance:** The agreement includes confidential negotiation details, pricing and other contractual terms. The Sellers and the Company maintain this

information as trade secret as it has independent economic value from not being generally known to, and not being readily ascertainable by, other parties who could obtain economic value from its disclosure or use.

4. **Date the Information was Prepared:** The agreement was executed on March 11, 2004.

Portions of this filing and Attachment B in its entirety are marked “Highly Sensitive Trade Secret Information” (HSTS Information) as they contain Critical Energy Infrastructure Information (CEII) as defined in Federal Energy Regulatory Commission (FERC) rules and policies, specifically 18 C.F.R. § 388.113. CEII has been redacted from portions of the filing as they contain contingency information related to or proposed to critical electric infrastructure, the incapacity or destruction of which would negatively affect national security, economic security, public health or safety, or any combination of such matters. Xcel Energy protects CEII as confidential Security Information as defined by Minn. Stat. § 13.37(1)(a), as its disclosure would be likely to substantially jeopardize the security of vital system information, and property against trespass, or physical injury or otherwise cause financial harm from its disclosure. Xcel Energy maintains this information as confidential pursuant to Minn. Rule 7829.0500, subp 2.

Additionally, portions of this filing and Attachment B contain information the Company considers to be trade secret data as defined by Minn. Stat. § 13.37(1)(b) and that is marked as HSTS Information pursuant to the Protective Order in Docket No. E002/CN-23-212. This data includes confidential negotiation details, pricing and other contractual terms. The information has independent economic value from not being generally known to, and not being readily ascertainable by, other parties who could obtain economic value from its disclosure or use.

Attachment B is marked HSTS Information in its entirety. Pursuant to Minn. R. 7829.0500, subp. 3, the Company provides the following description of the excised material:

1. **Nature of the Material:** Attachment B is a table providing default provisions that are terms in the MEC BESS agreement included with the Company’s September 26, 2025 Petition in the above-referenced dockets.
2. **Authors:** Attachment B was drafted by Company’s Purchased Power personnel at the request of the Department of Commerce, Division of Energy Resources.
3. **Importance:** Attachment B includes confidential negotiation details, pricing and other contractual terms, and security information. The Seller and/or the Company maintain this information as trade secret as it has independent

economic value from not being generally known to, and not being readily ascertainable by, other parties who could obtain economic value from its disclosure or use.

4. **Date the Information was Prepared:** Attachment B was prepared for purposes of these Reply Comments.

The HSTS Information version of this filing is provided in Docket No. E002/M-24-195 only.

We have electronically filed this document with the Minnesota Public Utilities Commission, and copies have been served on the parties on the attached service lists. Please contact Shannon Whiton at shannon.whiton@xcelenergy.com or me at jody.l.londo@xcelenergy.com if you have any questions regarding this filing.

Sincerely,

/s/

JODY L. LONDO
DIRECTOR, REGULATORY AND STRATEGIC ANALYSIS

Enclosures
cc: Service Lists

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STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION

Katie J. Sieben	Chair
Hwikwon Ham	Commissioner
Audrey Partridge	Commissioner
Joseph K. Sullivan	Commissioner
John A. Tuma	Commissioner

IN THE MATTER OF XCEL ENERGY'S
COMPETITIVE RESOURCE ACQUISITION
PROCESS FOR UP TO 800 MEGAWATTS OF
FIRM DISPATCHABLE GENERATION

DOCKET NO. E002/CN-23-212

IN THE MATTER OF XCEL ENERGY'S
2024-2040 UPPER MIDWEST INTEGRATED
RESOURCE PLAN

DOCKET NO. E002/RP-24-67

REPLY COMMENTS

INTRODUCTION

Northern States Power Company, doing business as Xcel Energy, submits these Reply Comments to the Minnesota Public Utilities Commission responding to the October 31, 2025 Comments of the Department of Energy, Division of Energy Resources (Department), the Office of the Attorney General—Residential Utilities Division (OAG) and Invenergy Renewables LLC (Invenergy) pursuant to the Commission's October 2, 2025 Notice of Comment Period in the above-referenced dockets.

The Commission requested that parties comment on the following in response to our September 26, 2025 Petition for Approval of Power Purchase Agreements (PPAs) for Firm Dispatchable Resources (Petition):

- Should the Commission approve the Invenergy Cannon Falls, Onward Mankato Energy Center, and DESRI North Star Energy PPAs?
- How does each PPA perform on the factors listed in Order Point 19 subparts a-d of the Commission's April 21, 2025, Order in Docket Nos. E002/CN-23-212 and E002/RP-24-67?

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- Is the Company's EnCompass modeling included in the Petition reasonable?
- Should the Commission authorize the Company to recover, through the Fuel Clause Rider, pursuant to Minn. Stat. § 216B.16 subd. 7(3), the Minnesota jurisdictional portion of the costs incurred under the agreements from Minnesota retail customers?
- Are there other issues or concerns related to this matter?

We thank parties for their comments and thoughtful review of our Petition. The proposed agreements represent a critical step forward in securing reliable, dispatchable capacity for our customers. Each agreement reflects a careful balance of affordability, risk mitigation, and operational flexibility, consistent with the Commission's directives in the IRP Order.

These PPAs will provide needed capacity and energy for our system and serve our customers at a reasonable cost, with terms that sufficiently protect our customers from risks associated with the non-deliverability of capacity and/or energy from the project(s).

As supplemented by this Reply, we respectfully request the Commission to:

- Find that the proposed agreements are in the public interest.
- Approve the proposed agreements.
- Authorize the Company to recover, through the Fuel Clause Rider, pursuant to Minn. Stat. § 216B.16 subd. 7(3), the Minnesota jurisdictional portion of the costs incurred under the agreements from Minnesota retail customers.
- Establish a procedural schedule such that the Commission may complete deliberations by mid-January 2026. Earlier approval increases the likelihood that projects will qualify for tax credits and significantly reduces the risk of construction delays or project failure.

In the balance of this Reply, we respond to parties and provide additional information requested by parties. We also respond to Invenergy's November 10, 2025 letter that requests the Commission to require Xcel Energy to resume negotiations for Lake Wilson. While we respond more fully below, we note that our October 31, 2025 update said that uncertainty in project costs continues to challenge the project's prudence – and *at this time*, it is not in the best interest of our customers to move forward with a PPA. Communications between Xcel Energy and Invenergy regarding Lake Wilson remained open until very recently. We have worked very diligently to strike a good solution for our customers with this project like we were able to do with

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the projects we have proposed the Commission approve. But, we have now concluded that the Lake Wilson project as it is currently configured is not in the best interests of our customers and further discussions would not be productive. As such, we do not intend to continue negotiations, but would encourage Invenergy to incorporate our feedback provided throughout the negotiations process and consider participating in a future RFP.

REPLY COMMENTS

I. DEPARTMENT OF COMMERCE

We appreciate the Department's thorough review and analysis of our Petition, and agree with the Department's supportive conclusions in its Comments. Of note, we appreciate and agree with the Department's conclusions that:

- Our PPA Petition is complete.¹
- Our EnCompass modeling presents a reasonable estimate of the incremental impact of changes made to the projects since they were advanced to the negotiations phase by the Commission.²

The Department makes three recommendations to the Commission:

1. Take no action regarding imputed debt at this time.
2. Approve the Onward MEC, Invenergy Cannon Falls, and DESRI North Star PPAs. Also, recommend the Commission approve the Onward MEC BESS PPA pending assessment of additional information from Xcel Energy.
3. Authorize the Company to recover the Minnesota jurisdictional portion of the costs incurred under the PPAs from Minnesota retail customers under Minn. Stat. § 216B.16.³

We agree with the Department's recommendation that the Commission does not need to take action regarding imputed debt at this time. As stated in our Petition, the Company intends to propose mitigation through an increase in our equity ratio in our next electric rate case filing.⁴

¹ Department Comments (Oct. 31, 2025) at p. 5.

² Id. at p. 28.

³ Id. at p. 29.

⁴ Petition at p. 17.

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Recommendations 2 and 3 align with our requests for Commission action as stated in our Petition. We appreciate the Department's support.

Below, we address the Department's request for the Company to provide additional information in our Reply Comments.

A. Pricing Evaluation

Order Point 19(a) in the IRP Order requires that the evaluation of the PPAs include, but not be limited to, whether:

- a. the prices and terms put ratepayers at risk for costs that are higher than bid or for benefits assumed in bids that do not materialize.⁵*

In its review of the PPA prices and terms, the Department requested the Company provide in its Reply Comments any contract terms and prices that are in the existing Onward MEC BESS PPA that are relevant to Order Point 19(a) but were not included in Attachments B and C of the Petition to ensure its Comments fully reflect all price terms.⁶

The Company notes that the only unique pricing term is the **[HSTS INFORMATION BEGINS HSTS INFORMATION ENDS]**. For payment provisions, the MEC BESS agreement makes mention of the Original PPA (the existing MEC-1 PPA agreement between Northern States Power and Mankato Energy Center, LLC dated March 11, 2004) and the Power Purchase Agreement (new MEC 1 PPA executed on September 16, 2025), only to clarify that the Seller is still entitled to payment under those agreements for **[HSTS INFORMATION BEGINS**

HSTS INFORMATION ENDS] and makes clear the payment obligations during the interim period where agreements may overlap. For example, if the new MEC 1 PPA has not yet commenced, and the **[HSTS INFORMATION BEGINS HSTS INFORMATION ENDS]** and energy is delivered to the point of delivery, Seller is still entitled to payment for the facility start and delivered energy under the Original PPA. And similarly, if the Original PPA has since

⁵ *In the Matter of Northern States Power Company d/b/a Xcel Energy's 2024-2040 Integrated Resource Plan and In the Matter of Xcel Energy's Competitive Resource Acquisition Process for up to 800 Megawatts of Firm Dispatchable Generation*, MPUC Docket Nos. E002/RP-24-67 and E002/CN-23-212, Order Approving Settlement Agreement with Modifications (IRP Order) (Apr. 21, 2025).

⁶ Department Comments at p. 11.

expired, Seller would be compensated under the new PPA or whichever underlying provision is in effect and control at the time. Billing and payment for those provisions will be handled under either the Original PPA or new PPA.

B. Evaluation of Deliverability Protections

Order Point 19(b) of the IRP Order requires that the evaluation of the PPAs include, but not be limited to, whether:

- b. the agreement had terms which sufficiently protected ratepayers from risks associated with the non-deliverability of accredited capacity and/or energy from the project(s) as proposed*

The Department identified two uncertainties in its review of the MEC BESS PPA:

1. References to Original PPA: Certain provisions appear to cite sections from the original PPA, which were not included in the Petition. The Department recommends that Xcel Energy attach the relevant sections with its Reply Comments.
2. Damages for Defaults: Article 12 lists varying liquidated damage amounts for different defaults. To clarify, the Department recommends that Xcel Energy provide a table in its Reply Comments detailing each default type, associated tasks, damage amounts, applicability of the **[HSTS INFORMATION BEGINS HSTS INFORMATION ENDS]**, and any explanatory notes.⁷

Regarding the Department's first uncertainty, the Company notes that any references to "Power Purchase Agreement" in the MEC BESS agreement are to the new MEC 1 PPA filed in the Company's September 26, 2025 petition and not to the current PPA. To be clear, the change in law provision and Section 14.5 of the MEC BESS PPA are referring to the new PPA, not the current PPA. References to the current PPA in the MEC BESS agreement are limited, as they are only intended to cover coordination of activities and operation of both facilities under the Original PPA and the MEC BESS agreement in the event that the BESS successfully achieves its commercial operation date before the new PPA commences on September 1, 2028 (before the current PPA expires). If this circumstance were to occur, any day-to-day operations or administrative activities would be governed under the terms of the current PPA (e.g., billing and

⁷ Id. at p. 17.

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payment activities, testing activities, or operations and maintenance activities). The current MEC PPA is included as Attachment A for reference.

The Company notes that many of the default provisions in Article 12 of the MEC BESS agreement are standard provisions that the Company would expect to include in any similar agreement, including the Model PPA, and are not necessarily specific to the MEC BESS agreement itself. Examples of these default provisions include failure to make payment, breach of representation or warranty, unpermitted assignment of the MEC BESS agreement, failure to maintain insurance, and others. These default provisions do not include specific damages but instead would be covered under the remedies for default under Section 12.3, which potentially includes Actual Damages. For the default provisions that are specific or unique to the MEC BESS agreement, please see Attachment B to these Reply Comments.

II. OFFICE OF THE ATTORNEY GENERAL

We appreciate the OAG's thorough review and thoughtful comments regarding our Petition. The OAG's comments highlight several important topics, including contract pricing and risk allocation, compliance with Minnesota's Carbon Free Standard (CFS), Right of First Offer (ROFO) provisions, and capital structure considerations. Below, we address each of these areas.

A. Contract Pricing and Risk Allocation

The OAG raises concerns about contract pricing, risk allocation, and the importance of prudent project selection to protect ratepayers from excessive cost exposure. We share the OAG's desire to advance only those resources that are cost-effective and present manageable risk for our customers.

This principle guided our approach for all projects in this docket, including the Lake Wilson Solar and Storage project, which as we discuss below, we determined that it is not in the best interest of our customers to move forward with a PPA at this time.⁸ Our decision reflects a commitment to ensuring that any resource we advance delivers clear value to our customers.

⁸ Xcel Energy, Update on Lake Wilson and Plum Creek Replacement (Oct. 31, 2025).

The OAG's comments on contract pricing and risk allocation focus on the need for robust protections against cost escalation and risk-shifting mechanisms, such as the proposed 20 percent adjustment for extraordinary geopolitical risks.⁹ We emphasize that our approach has been to advance only those projects where the risk to our customers is perceived as low. Further, this approach aligns with Commission Orders in other similar matters.¹⁰ The 20 percent mechanism is not automatic and includes a clear and practical cap; it is designed to avoid unnecessary delays from a second Commission review, which will delay project timelines and impact costs or reliability. An independent auditor will be engaged to ensure that all costs are just and reasonable, and we remain committed to transparency and regulatory oversight. Our goal is to balance timely project delivery with robust protections for ratepayers.

B. Carbon Free Standard Compliance

The OAG recommends that the Commission require Xcel Energy to provide further information to support the requested 20-year term for the Cannon Falls Energy Center, noting that this facility operates on natural gas and may require the Company to procure additional renewable energy credits (RECs) in the years 2040-2048 to comply with Minnesota's CFS.¹¹ We addressed compliance with the CFS in our Settlement Support Comments and our modeling specifically included a 20-year term for the Cannon Falls Energy Center.¹² The 20-year term of the Cannon Falls PPA is not a new or changed term. Our modeling and supporting Settlement Support Comments demonstrate that the Settlement meets the standard to provide 100 percent carbon free energy to our Minnesota retail customers by 2040.¹³

⁹ OAG Comments (Oct. 31, 2025) at pp. 6-10. The OAG also states that the price for the DESRI facility increased from the original bid of [HSTS INFORMATION BEGINS

HSTS INFORMATION ENDS]. DESRI's original bid, however, [HSTS INFORMATION BEGINS

HSTS INFORMATION ENDS].

¹⁰ See *In the Matter of the Petition of Northern States Power Company, d/b/a Xcel Energy, for Approval of Sherco Solar 3 and Apple River Solar Power Purchase Agreement*, Docket No. E002/M-22-403 at Order Point 5a (October 23, 2023) and *In the Matter of the Petition of Minnesota Power for Approval of Investments and Expenditures in the Boswell Solar Projects for Recovery through Minnesota Power's Renewable Resource Rider under Minn. Stat. § 216B.1645*, at Order Point 5 (May 13, 2025).

¹¹ OAG Comments at pp. 11-14.

¹² Xcel Energy Comments in Support of Settlement Agreement, Docket Nos. E002/CN-23-212 and E002/RP-24-67 (Oct. 25, 2024) at p. 4.

¹³ Attachment C to these comments provides the annual carbon-free generation allocated to Minnesota relative

C. Right of First Refusal Provisions

The OAG raises concerns regarding the inclusion of ROFO provisions in the PPAs, arguing that these provisions primarily benefit Xcel Energy and that there is insufficient record of the negotiation process to determine how ROFO may have influenced prices or terms. The OAG recommends that the Commission clarify that any exercise of ROFO purchase options will remain subject to required Commission review under Minnesota statute, to ensure ratepayer protections are maintained.¹⁴

The inclusion of ROFO provisions in the PPAs is intended to ensure long-term project success and continuity that directly benefits customers – not to confer undue benefit to the Company. It prioritizes customers' interests by securing potential opportunities for cost savings in the future and also ensures that after customers have supported these projects over their life, customers should have the first opportunity to own these projects rather than having them be sold to unrelated entities. To be clear, exercise of purchase options as a result of these provisions will be subject to Commission approval, consistent with Minn. Stat. § 216B.50. We are committed to maintaining transparency and regulatory oversight and compliance in any such transactions.

D. Capital Structure and Equity Ratio

The OAG notes that the Company anticipates the proposed PPAs may affect our future credit metrics and equity ratio. The OAG recommends that any changes to the Company's capital structure or equity ratio be considered in the appropriate regulatory forums, such as annual capital structure dockets or rate cases, rather than being addressed or pre-authorized in this proceeding.¹⁵ As previously indicated in response to the Department's comments, we agree that the Commission does not need to take action regarding imputed debt at this time. As stated in our Petition, the Company intends to propose mitigation through an increase in our equity ratio in our next electric rate case filing.

to our Minnesota retail sales through 2048 based on the EnCompass modeling conducted to support the Settlement. Attachment C confirms our compliance with the 100 percent carbon-free standard through 2048.

¹⁴ OAG Comments at pp. 14-15.

¹⁵ Id. at pp. 16-18.

III. LAKE WILSON SOLAR AND STORAGE

As discussed in our October 31, 2025 update and noted above, after careful evaluation of Lake Wilson’s project viability and associated risks – which include those related to supply chain uncertainty and cost escalation – we determined that it was not in the best interest of our customers to move forward with a PPA at that time.

It is, however, important to clarify the current status of negotiations with Invenergy. Invenergy’s November 10, 2025 letter to the Commission requests that Xcel Energy be required to resume negotiations for Lake Wilson; however, the letter mischaracterizes the current status and nature of the project’s challenges. Contrary to Invenergy’s assertions, the concern regarding project costs goes beyond supply chain uncertainty. Invenergy’s comments also fail to highlight that the project’s intermittent solar component and solar to storage ratio have been a primary impairment to the project from the onset, and would exacerbate congestion in the project area. Xcel Energy has been working diligently in good faith to seek solutions that could make the project viable under terms that are in the best interest of our customers – and we did that for the other projects. However, we have concluded that the Lake Wilson project as it is currently configured and in its current state is not in the best interests of our customers at this time.

Further discussions would not be productive and would detract from the work of our PPA team to secure other resources that are in the best interests of Xcel Energy customers. Our decision to not move forward with a PPA for this project as part of this proceeding reflects our commitment to ensuring that any resource we advance delivers clear value to our customers. We encourage Invenergy to incorporate our feedback provided throughout the negotiations process and consider participating in a future RFP.

CONCLUSION

We appreciate the commenting parties’ thoughtful review of our Petition. As noted in our Petition, the proposed agreements represent a critical step forward in securing reliable, dispatchable capacity for our customers. Each agreement reflects a careful balance of affordability, risk mitigation, and operational flexibility, consistent with the Commission’s directives in the IRP Order.

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These PPAs will provide needed capacity and energy for our system and serve our customers at a reasonable cost, with terms that sufficiently protect our customers from risks associated with the non-deliverability of capacity and/or energy from the project(s).

For these reasons, we respectfully reiterate our request that the Commission take the following actions:

- Find that the proposed agreements are in the public interest.
- Approve the proposed agreements:
 - **Invenergy – Cannon Falls:** a set of two, existing gas-fired combustion turbines, totaling 357 MW located in Cannon Falls, Minnesota
 - **Onward – Mankato Energy Center (MEC):** an existing 375 MW natural gas combined cycle facility, MEC 1, and a separate agreement for a new BESS. All components are located in Mankato, Minnesota.
 - **DESRI – North Star Energy:** a new, 100 MW BESS added to the existing North Star Storage facility located in Chisago County, Minnesota.
- Authorize the Company to recover, through the Fuel Clause Rider, pursuant to Minn. Stat. § 216B.16 subd. 7(3), the Minnesota jurisdictional portion of the costs incurred under the agreements from Minnesota retail customers.
- Establish a procedural schedule such that the Commission may complete deliberations by mid-January 2026. Earlier approval increases the likelihood that projects will qualify for tax credits and significantly reduces the risk of construction delays or project failure.

Dated: November 12, 2025

Northern States Power Company

Northern States Power Company

Docket Nos. E002/CN-23-212 & E002/RP-24-67
Reply Comments - PPAs for Firm Dispatchable Resources
Attachment A - Page 1 of 122

Execution copy

DOCUMENT # 182645

CONFIDENTIAL

PURCHASED POWER AGREEMENT

between

MANKATO ENERGY CENTER, LLC

and

NORTHERN STATES POWER COMPANY

MARCH 11, 2004

***** this Agreement includes a binding arbitration clause *****

Northern States Power Company

Docket No. E002/M-24-195
Reply Comments – PPAs for Firm Dispatchable Resources
Attachment B – Two Pages Total

Default Terms Specific to the MEC BESS Agreement

MEC BESS Default	MEC BESS Section	Default Description	Liquidated Damage Amount	Other Damages	Damage Cap Apply?	Other Notes
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[HSTS INFORMATION BEGINS

HSTS INFORMATION ENDS]

Annual Carbon-Free Generation Allocated to Minnesota: 2025-2048

	2025	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045	2046	2047	2048
Carbon-Free Generation (GWh)	35,531	35,736	35,154	44,499	45,393	45,835	49,239	50,465	50,280	52,235	52,199	54,571	54,003	56,773	58,029	60,481	60,174	61,668	68,186	69,168	68,621	68,438	66,810	67,148
MN Allocated CF Generation (GWh)	26,327	26,535	26,296	33,575	34,550	35,195	37,719	38,725	38,727	40,268	40,357	42,175	41,871	44,002	45,033	46,935	46,845	48,050	52,950	53,827	53,641	53,730	52,782	53,265
MN Elec Retail Sales (GWh)	31,739	33,846	35,199	35,267	35,339	35,726	36,150	36,817	37,623	38,674	39,669	40,958	42,090	43,050	44,022	44,625	45,212	45,818	46,302	47,000	47,603	48,190	48,639	49,018
Percentage Carbon Free Generation	82.9%	78.4%	74.7%	95.2%	97.8%	98.5%	104.3%	105.2%	102.9%	104.1%	101.7%	103.0%	99.5%	102.2%	102.3%	105.2%	103.6%	104.9%	114.4%	114.5%	112.7%	111.5%	108.5%	108.7%
Carbon Free Standard						80%					90%					100%								

CERTIFICATE OF SERVICE

I, Joshua DePauw, hereby certify that I have this day served copies or summaries of the foregoing documents on the attached list(s) of persons.

xx by depositing a true and correct copy thereof, properly enveloped
with postage paid in the United States Mail at Minneapolis, Minnesota

or

xx electronic filing

Docket Nos. E002/CN-23-212

E002/RP-24-67

Dated this 12th day of November 2025

/s/

Joshua DePauw
Regulatory Administrator

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21	Water Programs	Coordinator	waterprograms.bwsr@state.mn.us		Minnesota Board of Water and Soil Resources	520 Lafayette Road N St. Paul MN, 55155 United States	Electronic Service		No	23-212Official
22	George	Crocker	gwillc@nawo.org	North American Water Office		5093 Keats Avenue Lake Elmo MN, 55042 United States	Electronic Service		No	23-212Official
23	James	Denniston	james.r.denniston@xcelenergy.com	Xcel Energy Services, Inc.		414 Nicollet Mall, 401-8 Minneapolis MN, 55401 United States	Electronic Service		No	23-212Official
24	Ian M.	Dobson	ian.m.dobson@xcelenergy.com	Xcel Energy		414 Nicollet Mall, 401-8 Minneapolis MN, 55401 United States	Electronic Service		No	23-212Official
25	Randall	Doneen	randall.doneen@state.mn.us		Department of Natural Resources	500 Lafayette Rd, PO Box 25 Saint Paul MN, 55155 United States	Electronic Service		No	23-212Official
26	Richard	Dornfeld	richard.dornfeld@ag.state.mn.us		Office of the Attorney General - Department of Commerce	Minnesota Attorney General's Office 445 Minnesota Street, Suite 1800 Saint Paul MN, 55101 United States	Electronic Service		No	23-212Official
27	J.	Drake Hamilton	hamilton@fresh-energy.org	Fresh Energy		408 St Peter St Ste 350 Saint Paul MN, 55101 United States	Electronic Service		No	23-212Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
28	Christopher	Droske	christopher.droske@minneapolismn.gov	Northern States Power Company dba Xcel Energy-Elec		661 5th Ave N Minneapolis MN, 55405 United States	Electronic Service		No	23-212Official
29	Adam	Duininck	aduininck@ncsrcc.org	North Central States Regional Council of Carpenters		700 Olive Street St. Paul MN, 55130 United States	Electronic Service		No	23-212Official
30	Brian	Edstrom	briane@cubminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota St Ste W1360 Saint Paul MN, 55101 United States	Electronic Service		No	23-212Official
31	Kate	Fairman	kate.fairman@state.mn.us		Department of Natural Resources	Box 32 500 Lafayette Rd St. Paul MN, 55155-4032 United States	Electronic Service		No	23-212Official
32	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	23-212Official
33	Annie	Felix Gerth	annie.felix-gerth@state.mn.us			Board of Water & Soil Resources 520 Lafayette Rd Saint Paul MN, 55155 United States	Electronic Service		No	23-212Official
34	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	23-212Official
35	Mike	Fiterman	mikefiterman@libertydiversified.com	Liberty Diversified International		5600 N Highway 169 Minneapolis MN, 55428-3096 United States	Electronic Service		No	23-212Official
36	Lucas	Franco	lfranco@liunagro.com	LIUNA		81 Little Canada Rd E Little Canada MN, 55117 United States	Electronic Service		No	23-212Official
37	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	23-212Official
38	Kim	Havey	kim.havey@minneapolismn.gov	City of Minneapolis		350 South 5th Street, Suite 315M Minneapolis MN, 55415 United States	Electronic Service		No	23-212Official
39	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	23-212Official
40	Adam	Heinen	aheinen@dakotaelectric.com	Dakota Electric Association		4300 220th St W Farmington	Electronic Service		No	23-212Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
67	Dawn S	Marsh	dawn_marsh@fws.gov	U.S. Fish & Wildlife Service		Minnesota-Wisconsin Field Offices 4101 American Blvd E Bloomington MN, 55425 United States	Electronic Service		No	23-212Official
68	Emily	Marshall	emarshall@lourismarshall.com	Miller O'Brien Jensen, PA		120 S. 6th Street Suite 2400 Minneapolis MN, 55402 United States	Electronic Service		No	23-212Official
69	Katherine	Marshall	katie.marshall@lawmoss.com	Moss & Barnett		150 S 5th St Ste 1200 Minneapolis MN, 55402 United States	Electronic Service		No	23-212Official
70	Mary	Martinka	mary.a.martinka@xcelenergy.com	Xcel Energy Inc		414 Nicollet Mall 7th Floor Minneapolis MN, 55401 United States	Electronic Service		No	23-212Official
71	Gregg	Mast	gmast@cleanenergyeconomymn.org	Clean Energy Economy Minnesota		4808 10th Avenue S Minneapolis MN, 55417 United States	Electronic Service		No	23-212Official
72	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	23-212Official
73	Erica	McConnell	emcconnell@elpc.org	Environmental Law & Policy Center		35 E. Wacker Drive, Suite 1600 Chicago IL, 60601 United States	Electronic Service		No	23-212Official
74	Taylor	McNair	taylor@gridlab.org			668 Capp Street San Francisco CA, 94110 United States	Electronic Service		No	23-212Official
75	Melanie	Mesko Lee	melanie.lee@burnsvillemn.gov	City of Burnsville		100 Civic Center Parkway Burnsville MN, 55337-3867 United States	Electronic Service		No	23-212Official
76	Peder	Mewis	pmewis@cleangridalliance.org	Clean Grid Alliance		570 Asbury St. St. Paul MN, 55104 United States	Electronic Service		No	23-212Official
77	Stacy	Miller	stacy.miller@minneapolismn.gov	City of Minneapolis		350 S. 5th Street Room M 301 Minneapolis MN, 55415 United States	Electronic Service		No	23-212Official
78	David	Moeller	dmoeller@allete.com	Minnesota Power			Electronic Service		No	23-212Official
79	Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP		33 South Sixth St Ste 4200 Minneapolis MN, 55402 United States	Electronic Service		No	23-212Official
80	Evan	Mulholland	emulholland@mncenter.org	Minnesota Center for		1919 University Ave W Ste 515	Electronic Service		No	23-212Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
				Environmental Advocacy		Saint Paul MN, 55101 United States				
81	Alan	Muller	alan@greendel.org	Energy & Environmental Consulting		1110 West Avenue Red Wing MN, 55066 United States	Electronic Service		No	23-212Official
82	Carl	Nelson	cnelson@mncee.org	Center for Energy and Environment		212 3rd Ave N Ste 560 Minneapolis MN, 55401 United States	Electronic Service		No	23-212Official
83	David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency		220 South Sixth Street Suite 1300 Minneapolis MN, 55402 United States	Electronic Service		No	23-212Official
84	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	23-212Official
85	Ric	O'Connell	ric@gridlab.org	GridLab		2120 University Ave Berkeley CA, 94704 United States	Electronic Service		No	23-212Official
86	Carol A.	Overland	overland@legalelectric.org	Legalelectric - Overland Law Office		1110 West Avenue Red Wing MN, 55066 United States	Electronic Service		No	23-212Official
87	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	23-212Official
88	J.	Porter	greg.porter@nngco.com	Northern Natural Gas Company		1111 South 103rd St Omaha NE, 68124 United States	Electronic Service		No	23-212Official
89	Brian H.	Potts	brian.potts@huschblackwell.com	Husch Blackwell		33 E Main St Ste 300 Madison WI, 53703 United States	Electronic Service		No	23-212Official
90	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	23-212Official
91	Kurt	Rempe	krempe@nationalgridrenewables.com	National Grid Renewables Development, LLC		8400 Normandale Lake Blvd Suite 1200 Bloomington MN, 55437 United States	Electronic Service		No	23-212Official
92	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	23-212Official
93	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	23-212Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
94	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	23-212Official
95	Nathaniel	Runke	nrunke@local49.org			611 28th St. NW Rochester MN, 55901 United States	Electronic Service		No	23-212Official
96	Joseph L	Sathe	jsathe@kennedy-graven.com	Kennedy & Graven, Chartered		150 S 5th St Ste 700 Minneapolis MN, 55402 United States	Electronic Service		No	23-212Official
97	Richard J.	Savelkoul	rsavelkoul@martinsquires.com	Martin & Squires, PA		332 Minnesota St Ste W2750 St. Paul MN, 55101 United States	Electronic Service		No	23-212Official
98	Jeff	Schneider	jeff.schneider@ci.red-wing.mn.us	City of Red Wing		315 West 4th Street Red Wing MN, 55066 United States	Electronic Service		No	23-212Official
99	Peter	Scholtz	peter.scholtz@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	Suite 1400 445 Minnesota Street St. Paul MN, 55101-2131 United States	Electronic Service		No	23-212Official
100	Douglas	Seaton	doug.seaton@umwlc.org	Upper Midwest Law Center		8421 Wayzata Blvd Ste 300 Golden Valley MN, 55426 United States	Electronic Service		No	23-212Official
101	Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates		7400 Lyndale Ave S Ste 190 Richfield MN, 55423 United States	Electronic Service		Yes	23-212Official
102	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	23-212Official
103	Beth	Smith	bsmith@greatermankato.com	Greater Mankato Growth		1961 Premier Dr Ste 100 Mankato MN, 56001 United States	Electronic Service		No	23-212Official
104	Joshua	Smith	joshua.smith@sierraclub.org			85 Second St FL 2 San Francisco CA, 94105 United States	Electronic Service		No	23-212Official
105	Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.		76 W Kellogg Blvd St. Paul MN, 55102 United States	Electronic Service		No	23-212Official
106	Beth	Soholt	bsoholt@cleangridalliance.org	Clean Grid Alliance		570 Asbury Street Suite 201 St. Paul MN, 55104 United States	Electronic Service		No	23-212Official
107	Anna	Sommer	asommer@energyfuturesgroup.com	Energy Futures Group		PO Box 692 Canton NY, 13617 United States	Electronic Service		No	23-212Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
108	Mark	Spurr	msspurr@fvbenergy.com	International District Energy Association		222 South Ninth St., Suite 825 Minneapolis MN, 55402 United States	Electronic Service		No	23-212Official
109	Sean	Stalpes	sean.stalpes@state.mn.us		Public Utilities Commission	121 E. 7th Place, Suite 350 Saint Paul MN, 55101-2147 United States	Electronic Service		No	23-212Official
110	Byron E.	Starns	byron.starns@stinson.com	STINSON LLP		50 S 6th St Ste 2600 Minneapolis MN, 55402 United States	Electronic Service		No	23-212Official
111	Jayme	Trusty	execdir@swrdc.org	SWRDC		2401 Broadway Ave #1 Slayton MN, 56172 United States	Electronic Service		No	23-212Official
112	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	23-212Official
113	Carla	Vita	carla.vita@state.mn.us	MN DEED		Great Northern Building 12th Floor 180 East Fifth Street St. Paul MN, 55101 United States	Electronic Service		No	23-212Official
114	Julie	Voeck	julie.voeck@nee.com	NextEra Energy Resources, LLC		700 Universe Blvd Juno Beach FL, 33408 United States	Electronic Service		No	23-212Official
115	Amelia	Vohs	avohs@mncenter.org	Minnesota Center for Environmental Advocacy		1919 University Avenue West Suite 515 St. Paul MN, 55104 United States	Electronic Service		No	23-212Official
116	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	23-212Official
117	Julianna	Wei	julianna.wei@rondo.com	Rondo Energy, Inc.		1960 North Loop Alameda CA, 94502 United States	Electronic Service		No	23-212Official
118	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	23-212Official
119	Laurie	Williams	laurie.williams@sierraclub.org	Sierra Club		Environmental Law Program 1536 Wynkoop St Ste 200 Denver CO,	Electronic Service		No	23-212Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						80202 United States				
120	Joseph	Windler	jwindler@winthrop.com	Winthrop & Weinstine		225 South Sixth Street, Suite 3500 Minneapolis MN, 55402 United States	Electronic Service		No	23-212Official
121	Rob	Witwer	rob.witwer@onwardenergy.com	Onward Energy Holdings, LLC		767 Third Ave 17th Floor New York NY, 10017 United States	Electronic Service		No	23-212Official
122	Jonathan	Wolfgram	jonathan.wolfgram@state.mn.us		Office of Pipeline Safety	445 Minnesota St Ste 147 Woodbury MN, 55125 United States	Electronic Service		No	23-212Official
123	Tim	Wulling	t.wulling@earthlink.net			1495 Raymond Ave. Saint Paul MN, 55108 United States	Electronic Service		No	23-212Official
124	Kurt	Zimmerman	kwz@ibew160.org	Local Union #160, IBEW		2909 Anthony Ln St Anthony Village MN, 55418-3238 United States	Electronic Service		No	23-212Official
125	Emily	Ziring	eziring@stlouispark.org	City of St. Louis Park		5005 Minnetonka Blvd St. Louis Park MN, 55416 United States	Electronic Service		No	23-212Official
126	Patrick	Zomer	pat.zomer@lawmoss.com	Moss & Barnett PA		150 S 5th St #1200 Minneapolis MN, 55402 United States	Electronic Service		No	23-212Official
127	David	Zoppo	david.zoppo@huschblackwell.com	American Transmission Company LLC		33 East Main Street Suite 300 Madison WI, 53703 United States	Electronic Service		No	23-212Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
1	Steve	Albrecht	steve.albrecht@shakopeedakota.org	Shakopee Mdewakanton Sioux Community		Shakopee Mdewakanton Sioux Community 2330 Sioux Trail NW Prior Lake MN, 55372 United States	Electronic Service		No	24-67
2	Jared	Alholinna	jaholinna@grenergy.com	Great River Energy		12300 Elm Creek Boulevard Maple Grove MN, 55369 United States	Electronic Service		No	24-67
3	Keith	Anderson	keith.anderson@shakopeedakota.org	Shakopee Mdewakanton Sioux Community		Shakopee Mdewakanton Sioux Community 2330 Sioux Trail NW Prior Lake MN, 55372 United States	Electronic Service		No	24-67
4	Shannon	Anderson	sanderson@solarunitedneighbors.org	Solar United Neighbors			Electronic Service		No	24-67
5	Beren	Argetsinger	bargetsinger@keyesfox.com			PO BOX 166 Burdett NY, 14818 United States	Electronic Service		No	24-67
6	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	24-67
7	Mark	Bakk	mbakk@lcp.coop	Lake Country Power		26039 Bear Ridge Drive Cohasset MN, 55721 United States	Electronic Service		No	24-67
8	Daniel	Becchetti	dbecchetti@grenergy.com	Great River Energy		12300 Elm Creek Boulevard Maple Grove MN, 55369 United States	Electronic Service		No	24-67
9	Todd	Beck	tbeck@grenergy.com			null null, null United States	Electronic Service		No	24-67
10	Amadeo	Bellino	amadeo.bellino@whiteearth-nsn.gov	White Earth Nation		White Earth Tribal Headquarters 35500 Eagle View Road Ogema MN, 56569 United States	Electronic Service		No	24-67
11	Melanie	Benjamin	melanie.benjamin@millelacsband.com			43408 Oodena Drive Onamia MN, 56359 United States	Electronic Service		No	24-67
12	Sasha	Bergman	sasha.bergman@state.mn.us		Public Utilities Commission		Electronic Service		No	24-67
13	Laura	Bishop	laura.bishop@state.mn.us		Minnesota Pollution Control Agency	520 Lafayette Rd Saint Paul MN, 55155 United States	Electronic Service		No	24-67
14	Ingrid	Bjorklund	ingrid@bjorklundlaw.com	Bjorklund Law, PLLC		855 Village Center Drive #256	Electronic Service		No	24-67

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						North Oaks MN, 55127 United States				
15	Hunter	Boldt	hunterboldt@redlakenation.org	Red Lake Nation		15484 Migizi Drive Red Lake MN, 56671 United States	Electronic Service		No	24-67
16	Peter	Boney	pboney@boisforte-nsn.gov	Bois Forte Band of Chippewa		Bois Forte Tribal Government 5344 Lakeshore Drive Nett Lake MN, 55772 United States	Electronic Service		No	24-67
17	Sheldon	Boyd	sheldon.boyd@millelacsband.com	Mille Lacs Band of Ojibwe		43408 Oodena Drive Onamia MN, 56359 United States	Electronic Service		No	24-67
18	Jon	Brekke	jbrekke@greenergy.com	Great River Energy		12300 Elm Creek Boulevard Maple Grove MN, 55369-4718 United States	Electronic Service		No	24-67
19	Matthew	Brodin	mbrodin@allete.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	24-67
20	B. Andrew	Brown	brown.andrew@dorsey.com	Dorsey & Whitney LLP		Suite 1500 50 South Sixth Street Minneapolis MN, 55402-1498 United States	Electronic Service		No	24-67
21	Marvin Ray	Bruneau	marvin.bruneau@millelacsband.com	Mille Lacs Band of Ojibwe		43408 Oodena Drive Onamia MN, 56359 United States	Electronic Service		No	24-67
22	Christina	Brusven	cbrusven@fredlaw.com	Fredrikson Byron		60 S 6th St Ste 1500 Minneapolis MN, 55402-4400 United States	Electronic Service		No	24-67
23	Scott	Buchanan	scottbuchanan@fdlrez.com	Fond du Lac Band of Lake Superior Chippewa		1720 Big Lake Road Cloquet MN, 55720 United States	Electronic Service		No	24-67
24	Shelley	Buck	shelley.buck@piic.org	Prairie Island Indian Community		Prairie Island Indian Community 5636 Sturgeon Lake Road Welch MN, 55089 United States	Electronic Service		No	24-67
25	Robert	Budreau	robert.budreau@llojibwe.net	Leech Lake Band of Ojibwe		190 Sailstar Drive NW Cass Lake MN, 56633 United States	Electronic Service		No	24-67
26	Mike	Bull	mike.bull@state.mn.us		Public Utilities Commission	121 7th Place East, Suite 350 St. Paul MN,	Electronic Service		Yes	24-67

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						55101 United States				
27	Cathy	Chavers	cchavers@boisforte-nsn.gov	Bois Forte Band of Chippewa		Bois Forte Tribal Government 5344 Lakeshore Drive Nett Lake MN, 55772 United States	Electronic Service		No	24-67
28	Marc	Child	mchild@grenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	24-67
29	Michael	Childs, Jr.	michael.childsjr@piic.org	Prairie Island Indian Community		Prairie Island Indian Community 5636 Sturgeon Lake Road Welch MN, 55089 United States	Electronic Service		No	24-67
30	John	Coffman	john@johncoffman.net	AARP		871 Tuxedo Blvd. St. Louis MO, 63119-2044 United States	Electronic Service		No	24-67
31	Generic	Commerce Attorneys	commerce.attorneys@ag.state.mn.us		Office of the Attorney General - Department of Commerce	445 Minnesota Street Suite 1400 St. Paul MN, 55101 United States	Electronic Service		Yes	24-67
32	George	Crocker	gwillc@nawo.org	North American Water Office		5093 Keats Avenue Lake Elmo MN, 55042 United States	Electronic Service		No	24-67
33	Rebecca	Crooks Stratton	rebecca.crooks-stratton@shakopeedakota.org	Shakopee Mdewakanton Sioux Community		Shakopee Mdewakanton Sioux Community 2330 Sioux Trail NW Prior Lake MN, 55372 United States	Electronic Service		No	24-67
34	Brooke	Cunningham	health.review@state.mn.us	Minnesota Department of Health		PO Box 64975 St. Paul MN, 55164-0975 United States	Electronic Service		No	24-67
35	Miyah	Danielson	miyahdanielson@fdlrez.com	Fond du Lac Band of Lake Superior Chippewa		1720 Big Lake Road Cloquet MN, 55720 United States	Electronic Service		No	24-67
36	Jason	Decker	jason.decker@llojibwe.net	Leech Lake Band of Ojibwe		190 Sailstar Drive NW Cass Lake MN, 56633 United States	Electronic Service		No	24-67
37	Bobby	Deschampe	robertdeschampe@grandportage.com	Grand Portage Band of Lake Superior Chippewa		PO Box 428 Grand Portage MN, 55605 United States	Electronic Service		No	24-67
38	Kami	Diver	kamidiver@fdlrez.com	Fond du Lac Band of Lake Superior Chippewa		1720 Big Lake Road Cloquet MN, 55720 United States	Electronic Service		No	24-67

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
39	Becky	Dobbs	bdobbs@grenergy.com			null null, null United States	Electronic Service		No	24-67
40	Ian M.	Dobson	ian.m.dobson@xcelenergy.com	Xcel Energy		414 Nicollet Mall, 401-8 Minneapolis MN, 55401 United States	Electronic Service		No	24-67
41	Shane	Drift	sdrift@boisforte-nsn.gov	Bois Forte Band of Chippewa		Bois Forte Tribal Government 5344 Lakeshore Drive Nett Lake MN, 55772 United States	Electronic Service		No	24-67
42	Christopher	Droske	christopher.droske@minneapolismn.gov	Northern States Power Company dba Xcel Energy-Elec		661 5th Ave N Minneapolis MN, 55405 United States	Electronic Service		No	24-67
43	Adam	Duininck	aduininck@ncsrcc.org	North Central States Regional Council of Carpenters		700 Olive Street St. Paul MN, 55130 United States	Electronic Service		No	24-67
44	Wally	Dupuis	wallydupuis@fdlband.org	Fond du Lac Band of Lake Superior Chippewa		1720 Big Lake Road Cloquet MN, 55720 United States	Electronic Service		No	24-67
45	Kevin	Dupuis, Sr.	kevindupuis@fdlrez.com			Reservation Business Committee 1720 Big Lake Rd Cloquet MN, 55720 United States	Electronic Service		No	24-67
46	Jamie	Edwards	jamie.edwards@millelacsband.com	Mille Lacs Band of Ojibwe		43408 Oodena Drive Onamia MN, 56358 United States	Electronic Service		No	24-67
47	Michael	Fairbanks	michael.fairbanks@whiteearth-nsn.gov	White Earth Reservation Business Committee		PO Box 418 White Earth MN, 56591 United States	Electronic Service		No	24-67
48	John	Farrell	jfarrell@ilsr.org	Institute for Local Self-Reliance		2720 E. 22nd St Institute for Local Self-Reliance Minneapolis MN, 55406 United States	Electronic Service		No	24-67
49	Sharon	Ferguson	sharon.ferguson@state.mn.us		Department of Commerce	85 7th Place E Ste 280 Saint Paul MN, 55101-2198 United States	Electronic Service		No	24-67
50	Terri	Finn	terri.goggleye@llojibwe.net			null null, null United States	Electronic Service		No	24-67
51	Christine	Fox	cfox@itasca-mantrap.com	Itasca-Mantrap Coop. Electric Assn.		PO Box 192 Park Rapids MN, 56470 United States	Electronic Service		No	24-67
52	Lucas	Franco	lfranco@liunagroc.com	LIUNA		81 Little Canada Rd E Little Canada MN, 55117 United States	Electronic Service		No	24-67

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
67	Ronald	Horman	rhorman@redwoodelectric.com	Redwood Electric Cooperative		60 Pine Street Clements MN, 56224 United States	Electronic Service		No	24-67
68	Robbie	Howe	robbie.howe@llojibwe.net	Leech Lake Band of Ojibwe		190 Sailstar Drive NW Cass Lake MN, 56633 United States	Electronic Service		No	24-67
69	John	Ihle	ljihle@rrt.net	PlainStates Energy LLC		27451 S Hwy 34 Barnesville MN, 56514 United States	Electronic Service		No	24-67
70	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	24-67
71	Faron	Jackson, Sr.	faron.jackson@llojibwe.net			190 Sailstar Drive NW Cass Lake MN, 56633 United States	Electronic Service		No	24-67
72	Justin	Jahnz	justin.jahnz@ecemn.com	East Central Energy		412 Main Ave N Braham MN, 55006 United States	Electronic Service		No	24-67
73	Alan	Jenkins	aj@jenkinsatlaw.com	Jenkins at Law		2950 Yellowtail Ave. Marathon FL, 33050 United States	Electronic Service		No	24-67
74	Kevin	Jensvold	kevinj@uppersiouxcommunity-nsn.gov	Upper Sioux Community		PO Box 147 Granite Falls MN, 56241-0147 United States	Electronic Service		No	24-67
75	Annette	Johnson	annette.johnson@redlakenation.org	Red Lake Nation		15484 Migizi Drive Red Lake MN, 56671 United States	Electronic Service		No	24-67
76	Jody	Johnson	jody.johnson@piic.org	Prairie Island Indian Community		5636 Sturgeon Lake Rd Welch MN, 55089 United States	Electronic Service		No	24-67
77	Richard	Johnson	rick.johnson@lawmoss.com	Moss & Barnett		150 S. 5th Street Suite 1200 Minneapolis MN, 55402 United States	Electronic Service		No	24-67
78	Sarah	Johnson Phillips	sjphillips@stoel.com	Stoel Rives LLP		33 South Sixth Street Suite 4200 Minneapolis MN, 55402 United States	Electronic Service		No	24-67
79	Mark	Kaminski	mark.kaminski@gsa.gov	General Services Administration		1800 F Street NW Washington DC, 20405 United States	Electronic Service		No	24-67
80	Veda	Kanitz	vmkanitz@gmail.com			null null, null United States	Electronic Service		No	24-67

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
81	Jenny	Kartes	jkartes@arrowhead.coop	Arrowhead Electric Cooperative, Inc.(P)		PO Box 39 5401 W Hwy 61 Lutsen MN, 55612 United States	Electronic Service		No	24-67
82	David	Kempf	dkempf@greenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	24-67
83	William	Kenworthy	will@votesolar.org			1 South Dearborn St Ste 2000 Chicago IL, 60603 United States	Electronic Service		No	24-67
84	Bobby	King	bking@solarunitedneighbors.org	Solar United Neighbors		3140 43rd Ave S Minneapolis MN, 55406 United States	Electronic Service		No	24-67
85	Therese	LaCanne	tlacanne@greenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	24-67
86	Matthew	Lacey	mlacey@greenergy.com	Great River Energy		12300 Elm Creek Boulevard Maple Grove MN, 55369-4718 United States	Electronic Service		No	24-67
87	Arthur	LaRose	arthur.larose@llojibwe.net	Leech Lake Band of Ojibwe		190 Sailstar Drive NW Cass Lake MN, 56633 United States	Electronic Service		No	24-67
88	Robert L	Larsen	robert.larsen@lowersioux.com	Lower Sioux Indian Community		PO Box 308 39527 Reservation Highway 1 Morton MN, 56270 United States	Electronic Service		No	24-67
89	Mark	Larson	mlarson@meeker.coop	Meeker Coop Light & Power Assn		1725 Highway 12 E Ste 100 Litchfield MN, 55355 United States	Electronic Service		No	24-67
90	Michelle	Larson	michelle@redwingchamber.com	Red Wing Area Chamber of Commerce		439 Main Street Red Wing, MN Bay Point Park MN, 55066 United States	Electronic Service		No	24-67
91	Peder	Larson	plarson@larkinhoffman.com	Larkin Hoffman Daly & Lindgren, Ltd.		8300 Norman Center Drive Suite 1000 Bloomington MN, 55437 United States	Electronic Service		No	24-67
92	Dan	Leshner	dlesher@greenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	24-67
93	Michelle	Lommel	mlommel@greenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	24-67

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
94	Kavita	Maini	kmainsi@wi.rr.com	KM Energy Consulting, LLC		961 N Lost Woods Rd Oconomowoc WI, 53066 United States	Electronic Service		No	24-67
95	Christine	Marquis	regulatory.records@xcelenergy.com	Xcel Energy		414 Nicollet Mall MN1180-07-MCA Minneapolis MN, 55401 United States	Electronic Service		No	24-67
96	Shena	Matrious	shena.matrious@millelacsband.com	Mille Lacs Band of Ojibwe		43408 Oodena Drive Onamia MN, 56349 United States	Electronic Service		No	24-67
97	April	McCormick	aprilm@grandportage.com	Grand Portage Band of Lake Superior Chippewa		PO Box 428 Grand Portage MN, 55605 United States	Electronic Service		No	24-67
98	Ronald	Meier	rmeier@mcleodcoop.com	Mcleod Cooperative Power		3515 11th St East Glencoe MN, 55336 United States	Electronic Service		No	24-67
99	Peder	Mewis	pmewis@cleangridalliance.org	Clean Grid Alliance		570 Asbury St. St. Paul MN, 55104 United States	Electronic Service		No	24-67
100	Valentina	Mgeni	valentina.mgeni@piic.org	Prairie Island Indian Community		Prairie Island Indian Community 5636 Sturgeon Lake Road Welch MN, 55089 United States	Electronic Service		No	24-67
101	Cole W.	Miller	cole.miller@shakopeedakota.org	Shakopee Mdewakanton Sioux Community		Shakopee Mdewakanton Sioux Community 2330 Sioux Trail NW Prior Lake MN, 55372 United States	Electronic Service		No	24-67
102	Stacy	Miller	stacy.miller@minneapolismn.gov	City of Minneapolis		350 S. 5th Street Room M 301 Minneapolis MN, 55415 United States	Electronic Service		No	24-67
103	David	Moeller	dmoeller@allete.com	Minnesota Power			Electronic Service		No	24-67
104	Sarah	Mooradian	sarah@curemn.org	CURE		117 South 1st Street Montevideo MN, 56265 United States	Electronic Service		No	24-67
105	Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP		33 South Sixth St Ste 4200 Minneapolis MN, 55402 United States	Electronic Service		No	24-67
106	Travis	Morrison	travis.morrison@boisforte-nsn.gov	Bois Forte Band of Chippewa		Bois Forte Tribal Government 5344 Lakeshore Drive Nett Lake	Electronic Service		No	24-67

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						MN, 55772 United States				
107	David	Morrison, Sr.	david.morrison@boisforte-nsn.gov	Bois Forte Band of Chippewa		Bois Forte Tribal Government 5344 Lakeshore Drive Nett Lake MN, 55772 United States	Electronic Service		No	24-67
108	Evan	Mulholland	emulholland@mncenter.org	Minnesota Center for Environmental Advocacy		1919 University Ave W Ste 515 Saint Paul MN, 55101 United States	Electronic Service		No	24-67
109	Sonny	Myers	smyers@1854treatyauthority.org	1854 Treaty Authority		4428 Haines Rd Duluth MN, 55811-1524 United States	Electronic Service		No	24-67
110	Pouya	Najmaie	najm0001@gmail.com	Cooperative Energy Futures		3416 16th Ave S Minneapolis MN, 55407 United States	Electronic Service		No	24-67
111	Carl	Nelson	cnelson@mncee.org	Center for Energy and Environment		212 3rd Ave N Ste 560 Minneapolis MN, 55401 United States	Electronic Service		No	24-67
112	Deb	Nelson	dnelson@greenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	24-67
113	David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency		220 South Sixth Street Suite 1300 Minneapolis MN, 55402 United States	Electronic Service		No	24-67
114	Duane	Ninneman	duane@cureriver.org	Clean Up the River Environment		117 South 1st St Montevideo MN, 56265 United States	Electronic Service		No	24-67
115	Logan	O'Grady	logrady@mnseia.org	Minnesota Solar Energy Industries Association		2288 University Ave W St. Paul MN, 55114 United States	Electronic Service		No	24-67
116	Joseph	OBrien	joey.obrien@lowersioux.com			39527 Highway 1 Morton MN, 56270 United States	Electronic Service		No	24-67
117	Carol A.	Overland	overland@legalectric.org	Legalelectric - Overland Law Office		1110 West Avenue Red Wing MN, 55066 United States	Electronic Service		No	24-67
118	Gregory	Padden	gpadden@greenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	24-67
119	Jessica	Palmer Denig	jessica.palmer-denig@state.mn.us		Office of Administrative Hearings	600 Robert St N PO Box 64620 St. Paul MN,	Electronic Service		Yes	24-67

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						55164 United States				
120	Marsha	Parlow	mparlow@grenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	24-67
121	Priti	Patel	ppatel@grenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369-4718 United States	Electronic Service		No	24-67
122	Earl	Pendleton	earl.pendleton@lowersioux.com	Lower Sioux Indian Community		39527 Highway 1 Morton MN, 56270 United States	Electronic Service		No	24-67
123	Gordon	Pietsch	gpietsch@grenergy.com	Great River Energy		12300 Elm Creek Blvd. Maple Grove MN, 55369-4718 United States	Electronic Service		No	24-67
124	Joe	Plumer	joe.plumer@redlakenation.org	Red Lake Nation		15484 Migizi Drive Red Lake MN, 56671 United States	Electronic Service		No	24-67
125	Kevin	Pranis	kpranis@liunagroc.com	Laborers' District Council of MN and ND		81 E Little Canada Road St. Paul MN, 55117 United States	Electronic Service		No	24-67
126	Robert	Prescott	bob.prescott@lowersioux.com	Lower Sioux Indian Community		39527 Highway 1 Morton MN, 56270 United States	Electronic Service		No	24-67
127	Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	1400 BRM Tower 445 Minnesota St St. Paul MN, 55101-2131 United States	Electronic Service		Yes	24-67
128	Kevin	Reuther	kreuther@mncenter.org	MN Center for Environmental Advocacy		26 E Exchange St, Ste 206 St. Paul MN, 55101-1667 United States	Electronic Service		No	24-67
129	Stephan	Roos	stephan.roos@state.mn.us		Minnesota Department of Agriculture	625 Robert St N Saint Paul MN, 55155-2538 United States	Electronic Service		No	24-67
130	Alan	Roy	alan.roy@whiteearth-nsn.gov	White Earth Nation		White Earth Tribal Headquarters 35500 Eagle View Road Ogema MN, 56569 United States	Electronic Service		No	24-67
131	Bill	Rudnicki	bill.rudnicki@shakopeedakota.org	Shakopee Mdewakanton Sioux Community		Shakopee Mdewakanton Sioux Community 2330 Sioux Trail NW Prior Lake MN, 55372 United States	Electronic Service		No	24-67

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
132	Nathaniel	Runke	nrunke@local49.org			611 28th St. NW Rochester MN, 55901 United States	Electronic Service		No	24-67
133	Zachary	Ruzycki	zruzycki@grenergy.com	Great River Energy		12300 Elm Creek Boulevard Maple Grove MN, 55369 United States	Electronic Service		No	24-67
134	Miranda	Sam	miranda.sam@lowersioux.com	Lower Sioux Indian Community		39527 Reservation Highway 1 PO Box 308 Morton MN, 56270 United States	Electronic Service		No	24-67
135	Adam	Savariego	adams@uppersiouxcommunity-nsn.gov	Upper Sioux Community		5722 Travers Lane PO Box 147 Granite Falls MN, 56241 United States	Electronic Service		No	24-67
136	Ronald J.	Schwartau	rschwartau@noblesce.com	Nobles Electric Cooperative		22636 U.S. Hwy. 59 Worthington MN, 56187 United States	Electronic Service		No	24-67
137	Jessie	Seim	jessie.seim@piic.org	Prairie Island Indian Community		5636 Sturgeon Lake Rd Welch MN, 55089 United States	Electronic Service		No	24-67
138	Darrell	Seki, Sr.	dseki@redlakenation.org			15484 Migizi Drive Red Lake MN, 56671 United States	Electronic Service		No	24-67
139	Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates		7400 Lyndale Ave S Ste 190 Richfield MN, 55423 United States	Electronic Service		Yes	24-67
140	Joel	Smith	jsmith@mnchippewatribe.org	Minnesota Chippewa Tribe		PO Box 217 Cass Lake MN, 56633 United States	Electronic Service		No	24-67
141	Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.		76 W Kellogg Blvd St. Paul MN, 55102 United States	Electronic Service		No	24-67
142	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	24-67
143	Roger	Smith, Sr.	rogermsmithsr@fdlrez.com			1720 Big Lake Road Cloquet MN, 55720 United States	Electronic Service		No	24-67
144	Beth	Soholt	bsoholt@cleangridalliance.org	Clean Grid Alliance		570 Asbury Street Suite 201 St. Paul MN, 55104 United States	Electronic Service		No	24-67
145	Marie	Spry	mariespry@grandportage.com			PO Box 428 Grand	Electronic Service		No	24-67

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						Portage MN, 55605 United States				
146	Michael	Stalberger	michael.stalberger@blueearthcountymn.gov	Blue Earth County		410 S 5th Street Mankato MN, 56001 United States	Electronic Service		No	24-67
147	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	24-67
148	Byron E.	Starns	byron.starns@stinson.com	STINSON LLP		50 S 6th St Ste 2600 Minneapolis MN, 55402 United States	Electronic Service		No	24-67
149	Mark	Strohfus	mstrohfus@grenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	24-67
150	Samuel	Strong	sam.strong@redlakenation.org	Red Lake Nation		15484 Migizi Drive Red Lake MN, 56671 United States	Electronic Service		No	24-67
151	Timothy	Sullivan	tsullivan@whe.org	Wright Hennepin Coop. Electric Assn.		6800 Electric Drive PO Box 330 Rockford MN, 55373 United States	Electronic Service		No	24-67
152	David	Sunderman	daves@benco.org	BENCO (DUPLICATE)		PO Box 8 Mankato MN, 56002-0008 United States	Electronic Service		No	24-67
153	Camille	Tanhoff	kamip@uppersiouxcommunity-nsn.gov	Upper Sioux Community		5722 Travers Lane PO BOX 147 Granite Falls MN, 56241 United States	Electronic Service		No	24-67
154	Tim	Thompson	tthompson@lrec.coop	Lake Region Electric Cooperative		PO Box 643 1401 South Broadway Pelican Rapids MN, 56572 United States	Electronic Service		No	24-67
155	Geoffrey	Tolley	geoff.tolley@gmail.com			855 Stanley Road Two Harbors MN, 55616-1176 United States	Electronic Service		No	24-67
156	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	24-67
157	Jackie	Van Norman	jvannorman@grenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	24-67
158	Sam	Villella	sdvillella@gmail.com			10534 Alamo Street NE Blaine MN, 55449 United States	Electronic Service		No	24-67
159	Carla	Vita	carla.vita@state.mn.us	MN DEED		Great Northern	Electronic Service		No	24-67

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						Building 12th Floor 180 East Fifth Street St. Paul MN, 55101 United States				
160	Amelia	Vohs	avohs@mncenter.org	Minnesota Center for Environmental Advocacy		1919 University Avenue West Suite 515 St. Paul MN, 55104 United States	Electronic Service		No	24-67
161	Trent	Waite	twaite@grenergy.com			null null, null United States	Electronic Service		No	24-67
162	Heather	Westra	heather.westra@piic.org	Prairie Island Indian Community		5636 Sturgeon Lake Rd Welch MN, 55089 United States	Electronic Service		No	24-67
163	Steve	White	steve.white@llojibwe.net	Leech Lake Band of Ojibwe		190 Sailstar Drive NW Cass Lake MN, 56633 United States	Electronic Service		No	24-67
164	Cody	Whitebear	cody.whitebear@piic.org	Prairie Island Indian Community		5636 Sturgeon Lake Road Welch MN, 55089 United States	Electronic Service		No	24-67
165	John	Williams	jwilliams@grenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	24-67
166	Virgil	Wind	virgil.wind@millelacsband.com	Mille Lacs Band of Ojibwe		43408 Oodena Drive Onamia MN, 56359 United States	Electronic Service		No	24-67
167	Joseph	Windler	jwindler@winthrop.com	Winthrop & Weinstine		225 South Sixth Street, Suite 3500 Minneapolis MN, 55402 United States	Electronic Service		No	24-67
168	Laurie	York	laurie.york@whiteearth-nsn.gov	White Earth Reservation Business Committee		PO Box 418 White Earth MN, 56591 United States	Electronic Service		No	24-67
169	Curtis	Zaun	czaun@mnseia.org	MnSEIA		PO Box 8141 Saint Paul MN, 55108 United States	Electronic Service		No	24-67
170	Kurt	Zimmerman	kwz@ibew160.org	Local Union #160, IBEW		2909 Anthony Ln St Anthony Village MN, 55418-3238 United States	Electronic Service		No	24-67
171	Patrick	Zomer	pat.zomer@lawmoss.com	Moss & Barnett PA		150 S 5th St #1200 Minneapolis MN, 55402 United States	Electronic Service		No	24-67