

January 27, 2026

Sasha Bergman  
Minnesota Public Utilities Commission  
121 7th Place East, Suite 350  
St. Paul, Minnesota 55101-2147

**RE: Letter from the Minnesota Department of Commerce, Division of Energy Resources**  
Docket No. E002/M-25-378

Dear Ms. Bergman:

The Minnesota Department of Commerce (Department) respectfully submits this letter to the Minnesota Public Utilities Commission (Commission) in response to the January 9, 2026 Reply Comments of Xcel Energy.<sup>1</sup>

The Department has engaged in extensive collaboration with a diverse group of stakeholders, including the Joint Solar Parties (Coalition for Community Solar Access, Minnesota Solar Energy Industries Association, and Solar Energy Industries Association), Fresh Energy, US Solar, and the Distributed Solar Parties (Cooperative Energy Futures, Environmental Law and Policy Center, Institute for Local Self-Reliance, Solar United Neighbors, and Vote Solar). Through this process, the parties have developed the attached set of recommendations to assist the Commission in its evaluation of the technical and regulatory frameworks proposed in this docket.

The proposed recommendations establish a comprehensive framework designed to ensure that the deployment of distributed energy resources translates into measurable economic benefits for all Minnesota ratepayers. Rather than the pursuit of a singular deployment model, the Department recommends a diversified siting and operational strategy that tests (as fits the pilot-like nature of Xcel's proposal) three distinct value archetypes: economic arbitrage, reliability through non-wires alternatives, and the mitigation of DER-driven congestion. This approach is fundamentally rooted in the principle of cost-avoidance, seeking to utilize grid-connected assets to defer or eliminate the need for traditional, high-cost utility infrastructure investments.

The Department notes that while these recommendations represent a broad consensus on the fundamental need to prioritize ratepayer value and modernize the grid, they do not reflect a unanimous agreement among all participating parties. Stakeholders may maintain differing positions

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<sup>1</sup> *In the Matter of Northern States Power Company, dba Xcel Energy, Petition for Approval of Capacity\*Connect, a Distributed Capacity Procurement (DCP) program, Xcel Energy, Reply Comments, January 9, 2026, Docket No. E002/M-25-378, (eDockets) [20261-226715-01](https://www.dockets.mn.gov/20261-226715-01).*

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on specific technical or implementation details. Consequently, parties will provide their individual recommendations and further evidentiary support within their respective Supplemental Comments. The Department believes these options offer a structured and reasonable approach to the issues before the Commission.

Sincerely,

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

BP/PT/ar  
Attachment

## Attachment

### Recommendations

**Recommendation 1.** Direct Xcel to implement a diversified siting and operational strategy by testing the following three distinct archetypes to validate the full range of potential system benefits:

**Recommendation 1.1** Economic Arbitrage: Xcel shall site a portion of C\*C assets in locations selected to maximize energy market arbitrage value based on nodal Locational Marginal Pricing (LMP). This archetype must prioritize locations with the greatest spread between off-peak charging and on-peak discharging prices.

**Recommendation 1.2** Reliability and T&D Deferral: Xcel shall site a portion of C\*C assets to function as Non-Wires Alternatives (NWA) to address documented distribution reliability issues or to defer specific, budgeted infrastructure investments. Siting in this archetype should prioritize historically under-invested areas to align with equity goals, improving service quality and ensuring grid modernization benefits reach vulnerable ratepayers.

**Recommendation 1.3** DER Congestion, Hosting Capacity, and the DSRUP Pathway: Xcel shall site a portion of C\*C assets on feeders with high penetration of DERs experiencing grid congestion issues, specifically those characterized by low Day-time Minimum Load (DML). To ensure these assets directly support the expansion of hosting capacity and the fulfillment of the Company's Distributed Solar Energy Standard (DSES) obligations, they shall be implemented according to the following framework:

- C\*C assets focused on hosting capacity and DML shall be classified both as Flexible Interconnection assets and integrated into the Distribution System Reactive Upgrade Process (DSRUP). As such, these assets will be paid for by developers as a DSRUP asset.
- Assets must utilize the Grid DERMS platform to actively manage and absorb excess solar generation during peak hours. This approach is designed to increase hosting capacity and defer costly traditional infrastructure upgrades.
- The Commission shall evaluate the implementation of this archetype within Docket No. E002,015,017/CI-24-288, which shall request comments on:
  - The technical feasibility of integrating C\*C assets as Reactive Cost Share Distribution Upgrades within DSRUP.
  - The willingness to accept curtailment if the MISO capacity need does not fully align with the DSRUP capacity need.
  - The implementation of Xcel's adjusted revenue requirement (ARR) split between C\*C and DSRUP capacity needs.

**Recommendation 2:** Require a Phase 2 "Distribution Value Identification & Avoided Distribution Cost Workplan" (with deliverables, deadlines, and reporting). The Commission should require Xcel to develop, file, and execute a Distribution Value Identification & Avoided Distribution Cost Workplan as a core component of Phase 2 implementation. The Workplan should be 180 days after Commission Order. It must establish a Minnesota-specific, transparent method to quantify both systemwide and locational avoided distribution system costs for

distribution-connected storage and aggregated DER, and apply that method to Phase 2 siting, operations, and benefit-cost evaluation. At a minimum, the Workplan must include:

- A. Project-level distribution need statement and study scope for each Phase 2 asset (feeder/substation context; constraints addressed; operational objective(s); relevant planning horizon).
- B. Feeder- and substation-level power-flow modeling across the system, including—for feeders with identified grid needs—at least a “wires-only” case and a “DER-inclusive” case, to identify constraints, quantify impacts, and test dispatch requirements and operating envelopes.
- C. Minnesota-specific marginal distribution cost methodology that translates distribution planning drivers (capacity, reliability, voltage, losses, hosting capacity, etc.) into avoided-cost metrics suitable for benefit-cost analysis (e.g., \$/kW-year and other appropriate units), with clear assumptions, data sources, and ranges/uncertainty bounds.
- D. Ex-ante distribution value forecasts identifying candidate deferrals/avoidances and expected distribution benefits, plus a corresponding ex post measurement and verification plan to evaluate realized distribution outcomes and explain variance.
- E. Discussion of how Xcel plans to integrate Recommendation 2 A through D into the complementary behind-the-meter Virtual Power Plant program developed under Recommendation 7.

**Recommendation 3.** Require Xcel to provide information on mechanisms to ensure transparency and accountability in the sole-source selection of Sparkfund, including market-rate justification for costs.

**Recommendation 4.** For C\*C assets that increase generation-hosting capacity, authorize an expedited interconnection process for C\*C assets that maintains functional compliance with MN DIP technical safety and grid protection standards.

**Recommendation 4.1.** For C\*C assets that maximize energy market arbitrage value, or function as NWAs, authorize C\*C projects to be exempt from the MN DIP if the C\*C interconnection utilizes generation-hosting capacity reserved by Xcel’s Technical Planning Standard (TPS). Direct Xcel to prioritize the siting of assets at distribution nodes with high generation-hosting capacity to minimize deployment delays and avoid triggering significant system upgrades.

**Recommendation 4.2.** Direct Xcel to ensure that all utility assets that use the TPS reserved capacity or bypass MN DIP for expedited interconnection do not displace or negatively impact DER applicants already in the existing queue. If Xcel chooses not to use the TPS-reserved capacity for C\*C assets that decrease generation-hosting capacity, those C\*C assets must proceed through the MN DIP.

**Recommendation 4.3.** Require Xcel to document interconnection studies and distribution upgrades for each site in quarterly reports to ensure safety and reliability, even if bypassing the full MN DIP administrative process or utilizing the TPS reserved capacity.

**Recommendation 5.** Require Xcel to develop DERMS with an open architecture capable of integrating with third-party aggregators.

**Recommendation 6.** Authorize future cost recovery of Phase 2 through the RES Rider, subject to Commission review and approval of specific costs.

**Recommendation 7.** Direct Xcel to collaborate with stakeholders to develop and file a proposal for a complementary market-driven behind-the-meter Virtual Power Plant (VPP) program by July 1, 2027.

**Recommendation 7.1.** The filing must include target residential class customers across the utility territory, enable participation by customer owners, third-party operators and aggregators, and include a community-owned model targeting low-income households.

**Recommendation 7.2.** The community-owned model should evaluate the aggregation of multiple DERs, and supported by a financially-feasible tariff designed to deliver reliable financial benefits to low-income participants.

**Recommendation 7.3.** The proposal should include a tariff designed to provide fair compensation for the services provided by behind-the-meter assets.

**Recommendation 8.** Refine equity approach to track specific, quantifiable metrics such as the percentage of subcontracting dollars awarded to MWBE and evidence of active consultation with host communities—to include residents not receiving host payments—in EJ areas regarding site aesthetics and safety.

**Recommendation 8.1** Mandate proactive, targeted outreach to local, diverse firms and provide resources or mechanisms to support their participation in the bidding process, which can often be challenging for smaller entities.

**Recommendation 9.** Require Xcel to file a DCP Phase 2 Evaluation Plan within 180 days of Commission Order, including a methodology for quantifying avoided T&D costs and asset accreditation with MISO. The evaluation plan should also include a framework for data collection and developing tests cases to measure potential distribution value for archetypes in Recommendation 1.

**Recommendation 10.** Require quarterly program status reports covering deployment status, budget expenditures, archetype performance (with M&V data), Grid DERMS efficacy, interconnection studies, labor standards compliance, and equity progress.

**Recommendation 11.** Direct Xcel to conduct a Comprehensive Third-Party Evaluation after 20 MW of capacity is operational or after 2 years, whichever occurs first, and include the following:

- A. A detailed discussion of how Grid DERMS dispatch decisions reflect tradeoffs between bulk system and distribution system benefits.
- B. A detailed discussion of how Xcel's DERMS investments to date are capable of integrating with third-party aggregators (Recommendation 5), and any associated challenges and next steps.
- C. An analysis documenting which concurrent benefit streams were realized and the alignment between MISO dispatch requirements and distribution system value.
- D. A detailed discussion of the challenges and barriers faced when siting DCP assets in Phase II.

## **CERTIFICATE OF SERVICE**

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

**Minnesota Department of Commerce  
Supplemental Comments**

**Docket No. E002/M-25-378**

Dated this **27<sup>th</sup>** day of **January 2026**

**/s/Sharon Ferguson**

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87	Kim	Havey	kim.havey@minneapolismn.gov	City of Minneapolis		350 South 5th Street, Suite 315M Minneapolis MN, 55415 United States	Electronic Service		No	M-25-378
88	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	M-25-378
89	Adam	Heinen	aheinen@dakotaelectric.com	Dakota Electric Association		4300 220th St W Farmington MN, 55024 United States	Electronic Service		No	M-25-378
90	Annete	Henkel	mui@mnutilityinvestors.org	Minnesota Utility Investors		413 Wacouta Street #230 St.Paul MN, 55101 United States	Electronic Service		No	M-25-378
91	Kristin	Henry	kristin.henry@sierraclub.org	Sierra Club		2101 Webster St Ste 1300 Oakland CA, 94612 United States	Electronic Service		No	M-25-378
92	Katherine	Hinderlie	katherine.hinderlie@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	445 Minnesota St Suite 1400 St. Paul MN, 55101-2134 United States	Electronic Service		No	M-25-378
93	Michael	Hoppe	lu23@ibew23.org	Local Union 23, I.B.E.W.		445 Etna Street Ste. 61 St. Paul MN, 55106 United States	Electronic Service		No	M-25-378
94	Ronald	Horman	rhorman@redwoodelectric.com	Redwood Electric Cooperative		60 Pine Street Clements MN,	Electronic Service		No	M-25-378

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						56224 United States				
95	Frank	Hornstein	frank.hornstein@minneapolismn.gov	City of Minneapolis		350 S. 5th Street Room M 301 Minneapolis MN, 55415 United States	Electronic Service		No	M-25-378
96	Kari	Howe	kari.howe@state.mn.us		DEED	332 Minnesota St, #E200 1ST National Bank Bldg St. Paul MN, 55101 United States	Electronic Service		No	M-25-378
97	Robbie	Howe	robbie.howe@llojbwe.net	Leech Lake Band of Ojibwe		190 Sailstar Drive NW Cass Lake MN, 56633 United States	Electronic Service		No	M-25-378
98	Dean	Hunter	dean.hunter@state.mn.us		Minnesota Department of Labor & Industry	443 Lafayette Rd N St. Paul MN, 55155-4341 United States	Electronic Service		No	M-25-378
99	John	Ihle	ljihle@rrt.net	PlainStates Energy LLC		27451 S Hwy 34 Barnesville MN, 56514 United States	Electronic Service		No	M-25-378
100	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	M-25-378
101	Faron	Jackson, Sr.	faron.jackson@llojbwe.net			190 Sailstar Drive NW Cass Lake MN, 56633 United States	Electronic Service		No	M-25-378
102	Justin	Jahnz	justin.jahnz@ecemn.com	East Central Energy		412 Main Ave N Braham MN, 55006 United States	Electronic Service		No	M-25-378
103	Alan	Jenkins	aj@jenkinsatlaw.com	Jenkins at Law		2950 Yellowtail Ave. Marathon FL, 33050 United States	Electronic Service		No	M-25-378
104	Kevin	Jensvold	kevinj@uppersiouxcommunity-nsn.gov	Upper Sioux Community		PO Box 147 Granite Falls MN, 56241-0147 United States	Electronic Service		No	M-25-378
105	Annette	Johnson	annette.johnson@redlakenation.org	Red Lake Nation		15484 Migizi Drive Red Lake MN, 56671 United States	Electronic Service		No	M-25-378
106	Richard	Johnson	rick.johnson@lawmoss.com	Moss & Barnett		150 S. 5th Street Suite 1200 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-378
107	Sarah	Johnson Phillips	sjphillips@stoel.com	Stoel Rives LLP		33 South Sixth Street Suite 4200 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-378
108	Mark	Kaminski	mark.kaminski@gsa.gov	General Services		1800 F Street NW	Electronic Service		No	M-25-378

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
				Administration		Washington DC, 20405 United States				
109	Veda	Kanitz	vmkanitz@gmail.com			null null, null United States	Electronic Service		No	M-25-378
110	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	M-25-378
111	David	Kempf	dkempf@grenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	M-25-378
112	William	Kenworthy	will@votesolar.org			1 South Dearborn St Ste 2000 Chicago IL, 60603 United States	Electronic Service		No	M-25-378
113	Samuel B.	Ketchum	sketchum@kennedy-graven.com	Kennedy & Graven, Chartered		150 S 5th St Ste 700 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-378
114	Bobby	King	bking@solarunitedneighbors.org	Solar United Neighbors		3140 43rd Ave S Minneapolis MN, 55406 United States	Electronic Service		No	M-25-378
115	Raymond	Kirsch	raymond.kirsch@state.mn.us		Department of Commerce	85 7th Place E Ste 500 St. Paul MN, 55101 United States	Electronic Service		No	M-25-378
116	Frank	Kohlasch	frank.kohlasch@state.mn.us		Minnesota Pollution Control Agency	520 Lafayette Rd N. St. Paul MN, 55155 United States	Electronic Service		No	M-25-378
117	Brian	Kolbinger	brian@beckertownship.org	Becker Township Board		PO Box 248 12165 Hancock St Becker MN, 55308 United States	Electronic Service		No	M-25-378
118	Chad	Konickson	chad.konickson@usace.army.mil	U.S.Army Corps of Engineers		332 Minnesota St. Suite E1500 Saint Paul MN, 55101 United States	Electronic Service		No	M-25-378
119	Stacy	Kotch Egstad	stacy.kotch@state.mn.us		MINNESOTA DEPARTMENT OF TRANSPORTATION	395 John Ireland Blvd. St. Paul MN, 55155 United States	Electronic Service		No	M-25-378
120	Kay	Kuhlmann	teri.swanson@ci.red-wing.mn.us	City Of Red Wing		315 West Fourth Street Red Wing MN, 55066 United States	Electronic Service		No	M-25-378
121	Brenda	Kyle	bkyle@stpaulchamber.com	St. Paul Area Chamber of Commerce		401 N Robert Street Suite 150 St Paul MN, 55101 United States	Electronic Service		No	M-25-378
122	Therese	LaCanne	tlacanne@grenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	M-25-378

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
123	Matthew	Lacey	mlacey@grenergy.com	Great River Energy		12300 Elm Creek Boulevard Maple Grove MN, 55369-4718 United States	Electronic Service		No	M-25-378
124	Carmel	Laney	carmel.laney@stoel.com	Stoel Rives LLP		33 South Sixth Street Suite 4200 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-378
125	Arthur	LaRose	arthur.larose@llojibwe.net	Leech Lake Band of Ojibwe		190 Sailstar Drive NW Cass Lake MN, 56633 United States	Electronic Service		No	M-25-378
126	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	M-25-378
127	Mark	Larson	mlarson@meeker.coop	Meeker Coop Light & Power Assn		1725 Highway 12 E Ste 100 Litchfield MN, 55355 United States	Electronic Service		No	M-25-378
128	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	M-25-378
129	Peder	Larson	plarson@larkinhoffman.com	Larkin Hoffman Daly & Lindgren, Ltd.		8300 Norman Center Drive Suite 1000 Bloomington MN, 55437 United States	Electronic Service		No	M-25-378
130	Amber	Lee	amber.lee@stoel.com	Stoel Rives LLP		33 S. 6th Street Suite 4200 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-378
131	Rachel	Leonard	rachel.leonard@ci.monticello.mn.us	City of Monticello		505 Walnut St Ste 1 Monticello MN, 55362 United States	Electronic Service		No	M-25-378
132	Dan	Leshner	dlesher@grenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	M-25-378
133	Annie	Levenson Falk	annielf@cubminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota Street, Suite W1360 St. Paul MN, 55101 United States	Electronic Service		No	M-25-378
134	Michelle	Lommel	mlommel@grenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	M-25-378
135	Alice	Madden	alice@communitypowermn.org	Community Power		2720 E 22nd St Minneapolis MN, 55406 United States	Electronic Service		No	M-25-378

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
136	Kavita	Maini	kmains@wi.rr.com	KM Energy Consulting, LLC		961 N Lost Woods Rd Oconomowoc WI, 53066 United States	Electronic Service		No	M-25-378
137	Christine	Marquis	regulatory.records@xcelenergy.com	Xcel Energy		414 Nicollet Mall MN1180-07-MCA Minneapolis MN, 55401 United States	Electronic Service		Yes	M-25-378
138	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	M-25-378
139	Emily	Marshall	emarshall@lourismarshall.com	Miller O'Brien Jensen, PA		120 S. 6th Street Suite 2400 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-378
140	Katherine	Marshall	kmars@cozen.com	Moss & Barnett		150 S 5th St Ste 1200 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-378
141	Mary	Martinka	mary.a.martinka@xcelenergy.com	Xcel Energy Inc		414 Nicollet Mall 7th Floor Minneapolis MN, 55401 United States	Electronic Service		No	M-25-378
142	Gregg	Mast	gmast@cleanenergyeconomymn.org	Clean Energy Economy Minnesota		4808 10th Avenue S Minneapolis MN, 55417 United States	Electronic Service		No	M-25-378
143	Shena	Matrious	shena.matrious@millelacsband.com	Mille Lacs Band of Ojibwe		43408 Oodena Drive Onamia MN, 56349 United States	Electronic Service		No	M-25-378
144	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	M-25-378
145	Erica	McConnell	emcconnell@elpc.org	Environmental Law & Policy Center		35 E. Wacker Drive, Suite 1600 Chicago IL, 60601 United States	Electronic Service		No	M-25-378
146	April	McCormick	aprilm@grandportage.com	Grand Portage Band of Lake Superior Chippewa		PO Box 428 Grand Portage MN, 55605 United States	Electronic Service		No	M-25-378
147	Taylor	McNair	taylor@gridlab.org			668 Capp Street San Francisco CA, 94110 United States	Electronic Service		No	M-25-378
148	Ronald	Meier	rmeier@mcleodcoop.com	Mcleod Cooperative Power		3515 11th St East Glencoe MN, 55336 United States	Electronic Service		No	M-25-378
149	Melanie	Mesko Lee	melanie.lee@burnsvillemn.gov	City of Burnsville		100 Civic Center Parkway	Electronic Service		No	M-25-378

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						Burnsville MN, 55337-3867 United States				
150	Peder	Mewis	pmewis@cleangridalliance.org	Clean Grid Alliance		570 Asbury St. St. Paul MN, 55104 United States	Electronic Service		No	M-25-378
151	Valentina	Mgeni	valentina.mgeni@pic.org	Prairie Island Indian Community		Prairie Island Indian Community 5636 Sturgeon Lake Road Welch MN, 55089 United States	Electronic Service		No	M-25-378
152	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	M-25-378
153	David	Moeller	dmoeller@allete.com	Minnesota Power			Electronic Service		No	M-25-378
154	Sarah	Mooradian	sarah@curemn.org	CURE		117 South 1st Street Montevideo MN, 56265 United States	Electronic Service		No	M-25-378
155	Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP		33 South Sixth St Ste 4200 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-378
156	Travis	Morrison	travis.morrison@boisforte-nsn.gov	Bois Forte Band of Chippewa		Bois Forte Tribal Government 5344 Lakeshore Drive Nett Lake MN, 55772 United States	Electronic Service		No	M-25-378
157	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	M-25-378
158	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	M-25-378
159	Alan	Muller	alan@greendel.org	Energy & Environmental Consulting		1110 West Avenue Red Wing MN, 55066 United States	Electronic Service		No	M-25-378
160	Sonny	Myers	smyers@1854treatyauthority.org	1854 Treaty Authority		4428 Haines Rd Duluth MN, 55811-1524 United States	Electronic Service		No	M-25-378
161	Pouya	Najmaie	najm0001@gmail.com	Cooperative Energy Futures		3416 16th Ave S Minneapolis MN, 55407 United States	Electronic Service		No	M-25-378

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
162	Carl	Nelson	cnelson@mncee.org	Center for Energy and Environment		212 3rd Ave N Ste 560 Minneapolis MN, 55401 United States	Electronic Service		No	M-25-378
163	Deb	Nelson	dnelson@greenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	M-25-378
164	David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency		220 South Sixth Street Suite 1300 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-378
165	Duane	Ninneman	duane@cureriver.org	Clean Up the River Environment		117 South 1st St Montevideo MN, 56265 United States	Electronic Service		No	M-25-378
166	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	M-25-378
167	Ric	O'Connell	ric@gridlab.org	GridLab		2120 University Ave Berkeley CA, 94704 United States	Electronic Service		No	M-25-378
168	Logan	O'Grady	logrady@mnseia.org	Minnesota Solar Energy Industries Association		2288 University Ave W St. Paul MN, 55114 United States	Electronic Service		No	M-25-378
169	Joseph	OBrien	joey.obrien@lowersioux.com			39527 Highway 1 Morton MN, 56270 United States	Electronic Service		No	M-25-378
170	Carol A.	Overland	overland@legalelectric.org	Legalelectric - Overland Law Office		1110 West Avenue Red Wing MN, 55066 United States	Electronic Service		No	M-25-378
171	Gregory	Padden	gpadden@greenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	M-25-378
172	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	M-25-378
173	Marsha	Parlow	mparlow@greenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	M-25-378
174	Priti	Patel	ppatel@greenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369-4718 United States	Electronic Service		No	M-25-378
175	Earl	Pendleton	earl.pendleton@lowersioux.com	Lower Sioux Indian Community		39527 Highway 1 Morton MN, 56270 United States	Electronic Service		No	M-25-378
176	Gordon	Pietsch	gpietsch@greenergy.com	Great River Energy		12300 Elm Creek Blvd. Maple Grove	Electronic Service		No	M-25-378

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						MN, 55369-4718 United States				
177	Joe	Plumer	joe.plumer@redlakenation.org	Red Lake Nation		15484 Migizi Drive Red Lake MN, 56671 United States	Electronic Service		No	M-25-378
178	J.	Porter	greg.porter@nngco.com	Northern Natural Gas Company		1111 South 103rd St Omaha NE, 68124 United States	Electronic Service		No	M-25-378
179	Brian H.	Potts	brian.potts@huschblackwell.com	Husch Blackwell		33 E Main St Ste 300 Madison WI, 53703 United States	Electronic Service		No	M-25-378
180	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	M-25-378
181	Robert	Prescott	bob.prescott@lowersioux.com	Lower Sioux Indian Community		39527 Highway 1 Morton MN, 56270 United States	Electronic Service		No	M-25-378
182	Jody	Puddu	jody.puddu@piic.org	Prairie Island Indian Community		5636 Sturgeon Lake Rd Welch MN, 55089 United States	Electronic Service		No	M-25-378
183	Kurt	Rempe	krempe@nationalgridrenewables.com	National Grid Renewables Development, LLC		8400 Normandale Lake Blvd Suite 1200 Bloomington MN, 55437 United States	Electronic Service		No	M-25-378
184	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	M-25-378
185	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	M-25-378
186	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	M-25-378
187	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	M-25-378
188	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	M-25-378
189	Nathaniel	Runke	nrunke@local49.org			611 28th St. NW	Electronic Service		No	M-25-378

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						Rochester MN, 55901 United States				
190	Zachary	Ruzycski	zruzycki@greenergy.com	Great River Energy		12300 Elm Creek Boulevard Maple Grove MN, 55369 United States	Electronic Service		No	M-25-378
191	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	M-25-378
192	Joseph L	Sathe	jsathe@kennedy-graven.com	Kennedy & Graven, Chartered		150 S 5th St Ste 700 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-378
193	Adam	Savariego	adams@uppersiouxcommunity-nsn.gov	Upper Sioux Community		5722 Travers Lane PO Box 147 Granite Falls MN, 56241 United States	Electronic Service		No	M-25-378
194	Richard J.	Savelkoul	rsavelkoul@martinsquires.com	Martin & Squires, PA		332 Minnesota St Ste W2750 St. Paul MN, 55101 United States	Electronic Service		No	M-25-378
195	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	M-25-378
196	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	M-25-378
197	Ronald J.	Schwartau	rschwartau@noblesce.com	Nobles Electric Cooperative		22636 U.S. Hwy. 59 Worthington MN, 56187 United States	Electronic Service		No	M-25-378
198	Douglas	Seaton	doug.seaton@umwlc.org	Upper Midwest Law Center		8421 Wayzata Blvd Ste 300 Golden Valley MN, 55426 United States	Electronic Service		No	M-25-378
199	Jessie	Seim	jessie.seim@piic.org	Prairie Island Indian Community		5636 Sturgeon Lake Rd Welch MN, 55089 United States	Electronic Service		No	M-25-378
200	Darrell	Seki, Sr.	dseki@redlakenation.org			15484 Migizi Drive Red Lake MN, 56671 United States	Electronic Service		No	M-25-378
201	Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates		7400 Lyndale Ave S Ste 190 Richfield MN, 55423 United States	Electronic Service		No	M-25-378
202	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	M-25-378

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
203	Beth	Smith	bsmith@greatermankato.com	Greater Mankato Growth		1961 Premier Dr Ste 100 Mankato MN, 56001 United States	Electronic Service		No	M-25-378
204	Joel	Smith	jsmith@mnchippewatribe.org	Minnesota Chippewa Tribe		PO Box 217 Cass Lake MN, 56633 United States	Electronic Service		No	M-25-378
205	Joshua	Smith	joshua.smith@sierraclub.org			85 Second St FL 2 San Francisco CA, 94105 United States	Electronic Service		No	M-25-378
206	Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.		76 W Kellogg Blvd St. Paul MN, 55102 United States	Electronic Service		No	M-25-378
207	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	M-25-378
208	Roger	Smith, Sr.	rogermsmithsr@fdlrez.com			1720 Big Lake Road Cloquet MN, 55720 United States	Electronic Service		No	M-25-378
209	Beth	Soholt	bsoholt@cleangridalliance.org	Clean Grid Alliance		570 Asbury Street Suite 201 St. Paul MN, 55104 United States	Electronic Service		No	M-25-378
210	Anna	Sommer	asommer@energyfuturesgroup.com	Energy Futures Group		PO Box 692 Canton NY, 13617 United States	Electronic Service		No	M-25-378
211	Marie	Spry	mariespry@grandportage.com			PO Box 428 Grand Portage MN, 55605 United States	Electronic Service		No	M-25-378
212	Mark	Spurr	mspurr@fvbenergy.com	International District Energy Association		222 South Ninth St., Suite 825 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-378
213	Michael	Stalberger	michael.stalberger@blueearthcountymn.gov	Blue Earth County		410 S 5th Street Mankato MN, 56001 United States	Electronic Service		No	M-25-378
214	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	M-25-378
215	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	M-25-378
216	Byron E.	Starns	byron.starns@stinson.com	STINSON LLP		50 S 6th St Ste 2600 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-378
217	Mark	Strohfus	mstrohfus@grenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove	Electronic Service		No	M-25-378

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						MN, 55369 United States				
218	Samuel	Strong	sam.strong@redlakenation.org	Red Lake Nation		15484 Migizi Drive Red Lake MN, 56671 United States	Electronic Service		No	M-25-378
219	Timothy	Sullivan	tsullivan@whe.org	Wright Hennepin Coop. Electric Assn.		6800 Electric Drive PO Box 330 Rockford MN, 55373 United States	Electronic Service		No	M-25-378
220	David	Sunderman	daves@benco.org	BENCO (DUPLICATE)		PO Box 8 Mankato MN, 56002-0008 United States	Electronic Service		No	M-25-378
221	Camille	Tanhoff	kamip@uppersiouxcommunity-nsn.gov	Upper Sioux Community		5722 Travers Lane PO BOX 147 Granite Falls MN, 56241 United States	Electronic Service		No	M-25-378
222	Tim	Thompson	tthompson@lrec.coop	Lake Region Electric Cooperative		PO Box 643 1401 South Broadway Pelican Rapids MN, 56572 United States	Electronic Service		No	M-25-378
223	Geoffrey	Tolley	geoff.tolley@gmail.com			855 Stanley Road Two Harbors MN, 55616-1176 United States	Electronic Service		No	M-25-378
224	Jayme	Trusty	execdir@swrdc.org	SWRDC		2401 Broadway Ave #1 Slayton MN, 56172 United States	Electronic Service		No	M-25-378
225	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	M-25-378
226	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	M-25-378
227	Jackie	Van Norman	jvannorman@grenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	M-25-378
228	Christopher	Villarreal	cvillarreal@rstreet.org	R Street Institute		1212 New York Ave NW Ste 900 Washington DC, 20005 United States	Electronic Service		No	M-25-378
229	Sam	Villella	sdvillella@gmail.com			10534 Alamo Street NE Blaine MN, 55449 United States	Electronic Service		No	M-25-378
230	Carla	Vita	carla.vita@state.mn.us	MN DEED		Great Northern Building 12th Floor 180 East Fifth	Electronic Service		No	M-25-378

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						Street St. Paul MN, 55101 United States				
231	Julie	Voeck	julie.voeck@nee.com	NextEra Energy Resources, LLC		700 Universe Blvd Juno Beach FL, 33408 United States	Electronic Service		No	M-25- 378
232	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	M-25- 378
233	Trent	Waite	twaite@grenergy.com			null null, null United States	Electronic Service		No	M-25- 378
234	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	M-25- 378
235	Julianna	Wei	julianna.wei@rondo.com	Rondo Energy, Inc.		1960 North Loop Alameda CA, 94502 United States	Electronic Service		No	M-25- 378
236	Heather	Westra	heather.westra@piic.org	Prairie Island Indian Community		5636 Sturgeon Lake Rd Welch MN, 55089 United States	Electronic Service		No	M-25- 378
237	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	M-25- 378
238	Steve	White	steve.white@llojibwe.net	Leech Lake Band of Ojibwe		190 Sailstar Drive NW Cass Lake MN, 56633 United States	Electronic Service		No	M-25- 378
239	Cody	Whitebear	cody.whitebear@piic.org	Prairie Island Indian Community		5636 Sturgeon Lake Road Welch MN, 55089 United States	Electronic Service		No	M-25- 378
240	John	Williams	jwilliams@grenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	M-25- 378
241	Laurie	Williams	laurie.williams@sierraclub.org	Sierra Club		Environmental Law Program 1536 Wynkoop St Ste 200 Denver CO, 80202 United States	Electronic Service		No	M-25- 378
242	Virgil	Wind	virgil.wind@millelacsband.com	Mille Lacs Band of Ojibwe		43408 Oodena Drive Onamia MN, 56359 United States	Electronic Service		No	M-25- 378
243	Joseph	Windler	jwindler@winthrop.com	Winthrop & Weinstine		225 South Sixth Street, Suite 3500 Minneapolis MN, 55402 United States	Electronic Service		No	M-25- 378

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
244	Rob	Witwer	rob.witwer@onwardenergy.com	Onward Energy Holdings, LLC		767 Third Ave 17th Floor New York NY, 10017 United States	Electronic Service		No	M-25-378
245	Jonathan	Wolfgram	jonathan.wolfgram@state.mn.us		Office of Pipeline Safety	445 Minnesota St Ste 147 Woodbury MN, 55125 United States	Electronic Service		No	M-25-378
246	Tim	Wulling	t.wulling@earthlink.net			1495 Raymond Ave. Saint Paul MN, 55108 United States	Electronic Service		No	M-25-378
247	Laurie	York	laurie.york@whiteearth-nsn.gov	White Earth Reservation Business Committee		PO Box 418 White Earth MN, 56591 United States	Electronic Service		No	M-25-378
248	Curtis	Zaun	czaun@mnseia.org	MnSEIA		PO Box 8141 Saint Paul MN, 55108 United States	Electronic Service		No	M-25-378
249	Kurt	Zimmerman	kwz@ibew160.org	Local Union #160, IBEW		2909 Anthony Ln St Anthony Village MN, 55418-3238 United States	Electronic Service		No	M-25-378
250	Emily	Ziring	eziring@stlouispark.org	City of St. Louis Park		5005 Minnetonka Blvd St. Louis Park MN, 55416 United States	Electronic Service		No	M-25-378
251	Patrick	Zomer	pzomer@cozen.com	Cozen O'Connor		150 S. 5th Street, #1200 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-378
252	David	Zoppo	david.zoppo@huschblackwell.com	American Transmission Company LLC		33 East Main Street Suite 300 Madison WI, 53703 United States	Electronic Service		No	M-25-378