



May 28, 2024

—Via Electronic Filing—

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

RE: IN THE MATTER OF THE APPLICATION FOR A CERTIFICATE OF NEED FOR THE
BIG STONE SOUTH – ALEXANDRIA – BIG OAKS TRANSMISSION PROJECT
DOCKET NO. E002, E017, ET2, E015, ET10/CN-22-538

Dear Mr. Seuffert:

Northern States Power Company, doing business as Xcel Energy (Xcel Energy), Great River Energy, Minnesota Power, Otter Tail Power Company (Otter Tail), and Missouri River Energy Services, on behalf of Western Minnesota Municipal Power Agency (collectively, the Applicants) respectfully submit these reply comments to the initial comments submitted in response to the Minnesota Public Utilities Commission’s (the Commission) February 21, 2024 Notice of Comment Period on the Merits of the Certificate of Need Application (the February 21, 2024 Notice) in the above-referenced docket. As part of these reply comments, the Applicants are also providing updated construction cost estimates for Project that have been escalated to the year a particular cost is anticipated to be incurred. In the Certificate of Need Application, the Applicants provided cost estimates in 2022 dollars to match the estimates provided by MISO but committed to providing escalated cost estimates during the proceeding.¹

On September 29, 2023, the Applicants submitted a Certificate of Need application for the portion of the Big Stone South – Alexandria – Big Oaks 345 kilovolt (kV) Transmission Project located in Minnesota (the Project). The Project consists of new 345 kV transmission facilities between Big Stone City, South Dakota, and Sherburne County, Minnesota, which will be comprised of two segments:

¹ Certificate of Need application at 20.

- the western segment will run from the existing Big Stone South Substation near Big Stone City, South Dakota, to the existing Alexandria Substation near Alexandria, Minnesota (the Western Segment); and
- the eastern segment will continue from the existing Alexandria Substation to the existing Riverview Substation to a new Big Oaks Substation in Sherburne County, Minnesota (the Eastern Segment).

Also on September 29, 2023, the Applicants submitted a Route Permit application for the Eastern Segment of the Project, also known as the Alexandria – Big Oaks 345 kV Transmission Project.²

The Commission’s February 21, 2024 Notice requested comments on whether there are any contested issues of fact regarding the Certificate of Need application, whether the Commission should grant a Certificate of Need for the Project, and whether there are other issues or concerns related to this matter. During the initial comment period, comments were submitted by the Minnesota Department of Commerce, Division of Energy Resources (the Department); Audubon Upper Mississippi River, Clean Grid Alliance, Center for Rural Affairs, Fresh Energy, Minnesota Center for Environmental Advocacy, Sierra Club, Citizens Utility Board of Minnesota, and Union of Concerned Scientists (collectively, the Joint Commenters); the Midcontinent Independent System Operator, Inc. (MISO); Carol A. Overland – Legalectric; the International Union of Operating Engineers Local 49 and North Central States Regional Council of Carpenters (the Labor Unions); and NoCapX 2020. The Applicants respond to each of these comments in turn below.

Department

In its comments, the Department recommends that the Commission grant a Certificate of Need for the Project if, after consideration of the Environmental Report, the Commission finds that the Project “will provide benefits to society in a manner compatible with protecting the natural and socioeconomic environments, including human health.”³ The Department also concluded that the Certificate of Need application meets the requirements of Minn. Stat. § 216B.243 and Minn. R. 7849.0010

² Otter Tail and Western Minnesota Municipal Power Agency plan to file a Route Permit application for the Western Segment in the fourth quarter 2024.

³ Department Comments at 31.

to 7849.0400. Further, the Department states that it did not identify any contested issues of fact with respect to the representations made in the Certificate of Need application.

The Department then makes several recommendations. Specifically, the Department recommends that the Commission condition approval of the Project on requiring Xcel Energy, Minnesota Power, and Otter Tail to: 1) provide a final cost or cap amount within 60 days of the Commission's order determining the route; 2) wait until the first rate case after the Project is placed in-service to recover any cost overruns from Minnesota customers; and 3) justify fully the reasonableness of recovering any cost overruns of the Project from Minnesota customers. Finally, the Department recommends that the Commission notify Xcel Energy, Minnesota Power, and Otter Tail that customers will not be put at risk for any assumed benefits that do not materialize.

The Applicants appreciate the Department's review of the Certificate of Need application. The Applicants also generally support the Department's recommendations. However, as to the Department's recommendation that Xcel Energy, Minnesota Power, and Otter Tail provide final estimated costs within 60 days of the Commission's order determining the route, the Applicants note that, because the Project is comprised of two segments, the Western Segment and the Eastern Segment, there will be two final estimated costs, one for each segment. Also, the provision of this information will be staggered, as the Route Permit proceeding for the Eastern Segment is currently pending whereas the Route Permit proceeding for the Western Segment has not yet begun.

Joint Commenters

The Joint Commenters recommend that the Commission grant a Certificate of Need for the Project. According to the Joint Commenters, the Applicants have satisfied the requirements for a Certificate of Need under Minn. Stat. § 216B.243 and Minn. R. Chapter 7849. Additionally, the Joint Commenters emphasize that this Project, and other planned transmission projects, are central to meeting Minnesota's 2040 carbon-free electricity standard. The Applicants appreciate and support the comments of the Joint Commenters.

MISO

In its comments, MISO discusses the substantial reliability, economic, and public policy benefits that the Project will provide to Minnesota. MISO also discusses how the Project will help realize the benefits provided by the Long-Range Transmission

Planning (LRTP) Tranche 1 portfolio of projects that MISO approved as part of the MISO's 2021 Transmission Expansion Plan (MTEP21). According to MISO, the Project will help ensure the ability of the transmission system to meet challenges presented by the ongoing and projected transition of generation resources and the need for development of long-term transmission planning solutions. MISO's comments also provide an in-depth discussion of the MISO reliability and economic planning analysis that demonstrated the benefits of both the LRTP Tranche 1 portfolio and the Project. The Applicants appreciate and support MISO's comments.

Carol A. Overland – Legalectric

Carol A. Overland – Legalectric recommends that the Commission issue an updated notice clarifying that comments on the Certificate of Need application may be provided at the public hearings in June and until the close of the public hearing comment period on July 8, 2024. The Applicants support robust public participation and support the Commission accepting public comments on the Certificate of Need application at the public hearings in June and until the close of the public hearing comment period on July 8, 2024, consistent with the Second Prehearing Order. The Applicants expect that the Commission's notice for the public hearings will note that the public hearing comment period, on issues related to both the Certificate of Need and the Route Permit for the Eastern Segment, is open until July 8, 2024. As a result, the Applicants do not believe the Commission needs to issue a revised notice to change the comment periods set forth in the February 21, 2024 Notice regarding the informal Certificate of Need process.

Labor Unions

The Labor Unions recommend that the Commission grant a Certificate of Need for the Project. The Labor Unions state that the need for the Project has been demonstrated and that the Project meets all requirements under state laws and rules. Further, the Labor Unions believe that there are no contested issues of fact with respect to the representations made in the Certificate of Need application. The Applicants appreciate and concur with the Labor Unions' comments.

NoCapX 2020

Similar to Carol A. Overland – Legalectric,⁴ NoCapX 2020 recommends that the Commission issue an updated notice clarifying that comments on the Certificate of

⁴ Carol A. Overland – Legalectric submitted comments on behalf of NoCapX 2020.

Need application may be provided until July 8, 2024. As previously discussed, the Applicants support the Commission accepting public comments on the Certificate of Need application until July 8, 2024, consistent with the Second Prehearing Order.

NoCapX 2020 also states that the need for the Project is a contested issue of fact. Specifically, NoCapX 2020 questions whether the Project is needed given other projects in Minnesota, including those that are part of the LRTP Tranche 1 portfolio. Contrary to NoCapX 2020's claims, MISO, a Federal Energy Regulatory Commission-approved regional transmission organization, conducted a thorough analysis of the need for all the projects in the LRTP Tranche 1 portfolio, including this Project. MISO's analysis found that this Project, along with the Jamestown – Ellendale 345 kV Project, is needed to address reliability issues on the existing 230 kV system in eastern North Dakota and South Dakota and western and central Minnesota. Specifically, MISO concluded that this Project relieves 40 transmission elements with excessive thermal loading when one transmission element is out of service (N-1 contingency) and 70 transmission elements with excessive loading when one or more transmission elements are out of service (N-1-1 contingency).⁵ The Certificate of Need application provides a comprehensive summary of MISO's need analysis and provides unredacted public versions of MISO's studies as Appendix E.

As part of the Certificate of Need application, the Applicants also provide their own analysis of need and alternatives to the Project.⁶ Notably, Xcel Energy, on behalf of the Applicants, conducted an additional economic analysis of the Project and determined that the Project will provide up to \$2.1 billion in economic savings across the MISO footprint over the first 20 years that the Project is in service and up to \$3.8 billion in economic savings across the MISO footprint over the first 40 years.⁷ NoCapX 2020 puts forward no evidence to contest MISO or the Applicants' analyses of need of the Project.

Lastly, NoCapX 2020 asserts that the issue of whether the Commission should grant a Certificate of Need for the Project should not be determined until after the close of the public hearing comment period on July 8, 2024. In response, the Applicants note that the Second Prehearing Order does not provide for a Commission decision on the Certificate of Need application until October 3, 2024, well after the public hearing

⁵ Certificate of Need Application at 5.

⁶ See Chapters 4-5 of the Certificate of Need application.

⁷ Certificate of Need application at 5 and 75.

comment period closes. The Applicants support the current procedural schedule in the Second Prehearing Order.

Updated Project Cost Estimates

In the Certificate of Need application, the Applicants provided Project costs in 2022 dollars to be consistent with the cost estimates approved by MISO as part of MTEP21. The Applicants also committed to providing escalated cost estimates for each component of the Project in nominal dollars during the course of this proceeding once they are available. The table below provides these escalated costs. In addition to being escalated to the anticipated year of spend, the cost estimates provided below also reflect updates to the Project design that were not known at the time the Certificate of Need application was filed including:

- At the Alexandria, Big Stone South, and Riverview substations, the Applicants’ reactive study identified the need for larger reactors and at the Riverview Substation, additional bus work and expansion of the substation.
- At the Big Stone South Substation, Applicants determined that the substation would need to be expanded beyond its current fence line to accommodate the current design.
- At the Quarry Substation, the Applicants determined that a reactor was not needed to provide reactive power support for the Project and therefore no modifications to this substation are needed at this time.

The updated costs below also reflect increased labor and material costs since the filing of the Certificate of Need application.

Project Components	Low Capital Expenditures (\$ escalated to anticipated year spend) (\$Millions)	High Capital Expenditures (\$ escalated to anticipated year spend) (\$Millions)
Big Stone South – Alexandria 345 kV Transmission Line	\$465.0	\$535.0
Big Oaks – Alexandria 345 kV Transmission Line	\$134.6	\$143.0
Big Stone South Substation Modifications	\$14.0	\$24.0
Alexandria Substation Modifications	\$27.6	\$32.3

Riverview Substation Modifications	\$13.6	\$17.1
Quarry Substation Modifications	\$0	\$0
New Big Oaks Substation	\$74.9	\$88.5
Total Project Costs*	\$729.6	\$839.9

**There may be differences between the sum of the individual component amounts and Total Project Costs due to rounding*

Conclusion

The Applicants appreciate the opportunity to respond to the initial comments submitted in response to the Commission’s February 21, 2024 Notice. The Applicants respectfully request that the Commission:

- Find that there are no contested issues of fact regarding the Certificate of Need application;
- Grant a Certificate of Need for the Project; and
- Find that there are no other issues or concerns related to this matter.

If you have any questions regarding this filing, please contact Lauren Steinhaeuser at 612-216-8274 or lauren.steinhaeuser@xcelenergy.com.

Sincerely,

/s/Lauren Steinhaeuser

LAUREN STEINHAEUSER

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cc: Service List

IN THE MATTER OF THE APPLICATION
FOR A CERTIFICATE OF NEED FOR THE
BIG STONE SOUTH – ALEXANDRIA – BIG
OAKS TRANSMISSION PROJECT

Docket No. E002, E017, ET2, E015,
ET10/CN-22-538

CERTIFICATE OF SERVICE

Theresa Senart certifies that on the 28th day of May 2024, on behalf of Northern States Power Company, doing business as Xcel Energy, Great River Energy, Minnesota Power, Otter Tail Power Company, and Western Minnesota Municipal Power Agency, she efiled a true and correct copy of **Reply Comments** by posting the same on [eDockets](#) in the above-referenced docket. Said document was also served as designated on the attached Service List on file with the Minnesota Public Utilities Commission.

/s/Theresa Senart

Theresa Senart

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Annete	Henkel	mui@mnuilityinvestors.org	Minnesota Utility Investors	413 Wacouta Street #230 St.Paul, MN 55101	Electronic Service	No	OFF_SL_22-538_Official CC Service List
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Corey	Hintz	chintz@dakotaelectric.com	Dakota Electric Association	4300 220th Street Farmington, MN 550249583	Electronic Service	No	OFF_SL_22-538_Official CC Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Michael	Hoppe	lu23@ibew23.org	Local Union 23, I.B.E.W.	445 Etna Street Ste. 61 St. Paul, MN 55106	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Kari	Howe	kari.howe@state.mn.us	DEED	332 Minnesota St, #E200 1ST National Bank Bldg St. Paul, MN 55101	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Lori	Hoyum	lhoyum@mnpower.com	Minnesota Power	30 West Superior Street Duluth, MN 55802	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Annie	Jackson	Cheryl.Jackson@whiteearth-nsn.gov	White Earth Nation	White Earth Tribal Headquarters 35500 Eagle View Road Ogemo, MN 56569	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Faron	Jackson, Sr.	faron.jackson@llojibwe.net	Leech Lake Band of Ojibwe	190 Sailstar Drive NW Cass Lake, MN 56633	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Travis	Jacobson	travis.jacobson@mdu.com	Great Plains Natural Gas Company	400 N 4th St Bismarck, ND 58501	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Alan	Jenkins	aj@jenkinsatlaw.com	Jenkins at Law	2950 Yellowtail Ave. Marathon, FL 33050	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Kevin	Jensvold	kevinj@upperSiouxcommunity-nsn.gov	Upper Sioux Community	PO Box 147 Granite Falls, MN 56241-0147	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Richard	Johnson	Rick.Johnson@lawmoss.com	Moss & Barnett	150 S. 5th Street Suite 1200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Jody	Johnson	jody.johnson@piic.org	Prairie Island Indian Community	5636 Sturgeon Lake Rd Welch, MN 55089	Electronic Service	No	OFF_SL_22-538_Official CC Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Johnny	Johnson	Johnny.Johnson@piic.org	Prairie Island Indian Community	5636 Sturgeon Lake Road Welch, MN 55089	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Scott	Johnson	Scott.Johnson@ci.medina.mn.us	City of Medina	2052 County Road 24 Medina, MN 55340-9790	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Sarah	Johnson Phillips	sarah.phillips@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Michael	Kaluzniak	mike.kaluzniak@state.mn.us	Public Utilities Commission	Suite 350 121 Seventh Place East St. Paul, MN 55101	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Nick	Kaneski	nick.kaneski@enbridge.com	Enbridge Energy Company, Inc.	11 East Superior St Ste 125 Duluth, MN 55802	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Tom	Karas	tomskaras@gmail.com		3171 309th Ave NW Cambridge, MN 55008	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Bruce	King	Brenda@ranww.org	Realtors, Association of Northwestern WI	Suite 3 1903 Keith Street Eau Claire, WI 54701	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Ray	Kirsch	Raymond.Kirsch@state.mn.us	Department of Commerce	85 7th Place E Ste 500 St. Paul, MN 55101	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Chad	Konickson	chad.konickson@usace.army.mil	U.S.Army Corps of Engineers	180 5th St # 700 Saint Paul, MN 55101	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Stacy	Kotch Egstad	Stacy.Kotch@state.mn.us	MINNESOTA DEPARTMENT OF TRANSPORTATION	395 John Ireland Blvd. St. Paul, MN 55155	Electronic Service	No	OFF_SL_22-538_Official CC Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Michael	Krikava	mkrikava@taftlaw.com	Taft Stettinius & Hollister LLP	2200 IDS Center 80 S 8th St Minneapolis, MN 55402	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Nicolle	Kupser	nkupser@greatermngas.com	Greater Minnesota Gas, Inc. & Greater MN Transmission, LLC	1900 Cardinal Ln PO Box 798 Faribault, MN 55021	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Mike	Laroque	mike.laroque@whiteearthnsn.gov	White Earth Nation	PO Box 418 White Earth, MN 56591	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Robert L	Larsen	robert.larsen@lowersioux.com	Lower Sioux Indian Community	PO Box 308 39527 Reservation Highway 1 Morton, MN 56270	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Peder	Larson	plarson@larkinhoffman.com	Larkin Hoffman Daly & Lindgren, Ltd.	8300 Norman Center Drive Suite 1000 Bloomington, MN 55437	Electronic Service	No	OFF_SL_22-538_Official CC Service List
James D.	Larson	james.larson@avantenergy.com	Avant Energy Services	220 S 6th St Ste 1300 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Eric	Lipman	eric.lipman@state.mn.us	Office of Administrative Hearings	PO Box 64620 St. Paul, MN 551640620	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Jason	Loos	jason.loos@centerpointenergy.com	CenterPoint Energy Resources Corp.	505 Nicollet Mall 3rd Floor Minneapolis, MN 55402	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Susan	Ludwig	sludwig@mnpower.com	Minnesota Power	30 West Superior Street Duluth, MN 55802	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Vernelle	Lussier	vernelle.lussier@redlakensation.org	Red Lake Nation	15484 Migizi Drive Red Lake, MN 56671	Electronic Service	No	OFF_SL_22-538_Official CC Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Kavita	Maini	kmainsi@wi.rr.com	KM Energy Consulting, LLC	961 N Lost Woods Rd Oconomowoc, WI 53066	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Dawn S	Marsh	dawn_marsh@fws.gov	U.S. Fish & Wildlife Service	Minnesota-Wisconsin Field Offices 4101 American Blvd E Bloomington, MN 55425	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Shena	Matrious	Shena.Matrious@millelacs band.com	Mille Lacs Band of Ojibwe	43408 Oodena Drive Onamia, MN 56349	Electronic Service	No	OFF_SL_22-538_Official CC Service List
April	McCormick	aprilm@grandportage.com	Grand Portage Band of Lake Superior Chippewa	PO Box 428 Grand Portage, MN 55605	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Megan	McKenzie	megan.mckenzie@state.mn.us	Office of Administrative Hearings	PO Box 64620 St Paul, MN 55164	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Valentina	Mgeni	Valentina.Mgeni@piic.org	Prairie Island Indian Community	Prairie Island Indian Community 5636 Sturgeon Lake Road Welch, MN 55089	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Stacy	Miller	stacy.miller@minneapolis mn.gov	City of Minneapolis	350 S. 5th Street Room M 301 Minneapolis, MN 55415	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Cole W.	Miller	cole.miller@shakopeedakota.org	Shakopee Mdewakanton Sioux Community	Shakopee Mdewakanton Sioux Community 2330 Sioux Trail NW Prior Lake, MN 55372	Electronic Service	No	OFF_SL_22-538_Official CC Service List
David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022093	Electronic Service	No	OFF_SL_22-538_Official CC Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Gary D.	Moody	gmoody@audubon.org	National Audubon Society	225 Varrick St., FL 7 New York, NY 10014	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP	33 South Sixth St Ste 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Travis	Morrison	travis.morrison@boisforten.sn.gov	Bois Forte Band of Chippewa	Bois Forte Tribal Government 5344 Lakeshore Drive Nett Lake, MN 55772	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Robert	Moyer, Jr.	rmoyer@boisforten.sn.gov	Bois Forte Band of Chippewa Tribal Government	5344 Lakeshore Drive Nett Lake, MN 55772	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Sonny	Myers	smyers@1854treatyauthority.org	1854 Treaty Authority	4428 Haines Rd Duluth, MN 55811-1524	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Dan	Nelson	Dan.Nelson@ISGinc.com	I&S Group	115 E Hickory St Ste 300 Mankato, MN 56001	Electronic Service	No	OFF_SL_22-538_Official CC Service List
David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency	220 South Sixth Street Suite 1300 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Samantha	Norris	samanthanorris@alliantenergy.com	Interstate Power and Light Company	200 1st Street SE PO Box 351 Cedar Rapids, IA 524060351	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Joseph	O'Brien	joey.obrien@lowersioux.com	Lower Sioux Indian Community	39527 Highway 1 Morton, MN 56270	Electronic Service	No	OFF_SL_22-538_Official CC Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Samantha J	Odegard	samanthao@uppersiouxcommunity-nsn.gov	Upper Sioux Tribal Community	PO Box 147 Granite Falls, MN 56241	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Matthew	Olsen	molsen@otpc.com	Otter Tail Power Company	215 South Cascade Street Fergus Falls, MN 56537	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Carol A.	Overland	overland@legalelectric.org	Legalelectric - Overland Law Office	1110 West Avenue Red Wing, MN 55066	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Greg	Palmer	gpalmer@greatermngas.com	Greater Minnesota Gas, Inc. & Greater MN Transmission, LLC	1900 Cardinal Ln PO Box 798 Faribault, MN 55021	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Priti	Patel	ppatel@greenergy.com	Great River Energy	12300 Elm Creek Blvd Maple Grove, MN 55369-4718	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Earl	Pendleton	earl.pendleton@lowersioux.com	Lower Sioux Indian Community	39527 Highway 1 Morton, MN 56270	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Kevin	Peterson	kjp@ibew160.org	IBEW Local 160	1109 Northway Lane NE Rochester, MN 55906	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Jennifer	Peterson	jjpeterson@mnpower.com	Minnesota Power	30 West Superior Street Duluth, MN 55802	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Catherine	Phillips	Catherine.Phillips@wecenergygroup.com	Minnesota Energy Resources	231 West Michigan St Milwaukee, WI 53203	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Angela	Piner	angela.piner@hdrinc.com	HDR, Inc.	Suite 600 701 Xenia Avenue South Suite 600 Minneapolis, MN 55416	Electronic Service	No	OFF_SL_22-538_Official CC Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Joe	Plumer	joe.plumer@redlakenation.org	Red Lake Nation	15484 Migizi Drive Red Lake, MN 56671	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Kevin	Pranis	kpranis@liunagro.com	Laborers' District Council of MN and ND	81 E Little Canada Road St. Paul, MN 55117	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Robert	Prescott	bob.prescott@lowersioux.com	Lower Sioux Indian Community	39527 Highway 1 Morton, MN 56270	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Larry	Rebman	larryemls@hotmail.com	EMLS, Inc	PO Box 122 Appleton, MN 56208	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Generic Notice	Regulatory	regulatory_filing_coordinators@otpco.com	Otter Tail Power Company	215 S. Cascade Street Fergus Falls, MN 56537	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_22-538_Official CC Service List
Kevin	Reuther	kreuther@mncenter.org	MN Center for Environmental Advocacy	26 E Exchange St, Ste 206 St. Paul, MN 551011667	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Margaret	Rheude	Margaret_Rheude@fws.gov	U.S. Fish and Wildlife Service	Twin Cities Ecological Services Field Office 4101 American Blvd. E. Bloomington, MN 55425	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Susan	Romans	sromans@allete.com	Minnesota Power	30 West Superior Street Legal Dept Duluth, MN 55802	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Stephan	Roos	stephan.roos@state.mn.us	MN Department of Agriculture	625 Robert St N Saint Paul, MN 55155-2538	Electronic Service	No	OFF_SL_22-538_Official CC Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Bill	Rudnicki	bill.rudnicki@shakopeedakota.org	Shakopee Mdewakanton Sioux Community	Shakopee Mdewakanton Sioux Community 2330 Sioux Trail NW Prior Lake, MN 55372	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Nathaniel	Runke	nrunke@local49.org	International Union of Operating Engineers Local 49	611 28th St. NW Rochester, MN 55901	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Miranda	Sam	Miranda.Sam@lowersioux.com	Lower Sioux Indian Community	39527 Reservation Highway 1 PO Box 308 Morton, MN 56270	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Adam	Savariego	adams@uppersiouxcommunity-nsn.gov	Upper Sioux Community	5722 Travers Lane PO Box 147 Granite Falls, MN 56241	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Elizabeth	Schmiesing	eschmiesing@winthrop.com	Winthrop & Weinstine, P.A.	225 South Sixth Street Suite 3500 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Peter	Scholtz	peter.scholtz@ag.state.mn.us	Office of the Attorney General-RUD	Suite 1400 445 Minnesota Street St. Paul, MN 55101-2131	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Christine	Schwartz	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Jessie	Seim	jessie.seim@pic.org	Prairie Island Indian Community	5636 Sturgeon Lake Rd Welch, MN 55089	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Darrell	Seki, Sr.	dseki@redlakenation.org	Red Lake Nation	15484 Migizi Drive Red Lake, MN 56671	Electronic Service	No	OFF_SL_22-538_Official CC Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th Pl E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_22-538_Official CC Service List
Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates	7400 Lyndale Ave S Ste 190 Richfield, MN 55423	Electronic Service	Yes	OFF_SL_22-538_Official CC Service List
Bria	Shea	bria.e.shea@xcelenergy.com	Xcel Energy	414 Nicollet Mall Minneapolis, MN 55401	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Colleen	Sipiorski	Colleen.Sipiorski@wecenergygroup.com	Minnesota Energy Resources Corporation	700 North Adams St Green Bay, WI 54307	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Tom	Slukich	tom@nationalconductor.com	National Conductor Constructors	18119 Hwy 371 North Braiderd, MN 56401	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Joel	Smith	jsmith@mnchippewatribe.org	Minnesota Chippewa Tribe	PO Box 217 Cass Lake, MN 56633	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Nizhoni	Smith	nizhoni.smith@lowersioux.com	Lower Sioux Indian Community	PO Box 308 39527 Reservation Highway 1 Morton, MN 56270	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.	76 W Kellogg Blvd St. Paul, MN 55102	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Roger	Smith, Sr.	RogerMSmithSr@fdlrez.com	Fond du Lac Band of Lake Superior Chippewa	1720 Big Lake Road Cloquet, MN 55720	Electronic Service	No	OFF_SL_22-538_Official CC Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Adam	Sokolski	adam.sokolski@edf-re.com	EDF Renewable Energy	10 Second Street NE Ste 400 Minneapolis, MN 55410	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Eugene	Sommers	eugene.sommers@whiteearth-nsn.gov	White Earth Nation	PO BOX 418 White Earth, MN 56591	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Peggy	Sorum	peggy.sorum@centerpointenergy.com	CenterPoint Energy	505 Nicollet Mall Minneapolis, MN 55402	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Marie	Spry	mariespry@grandportage.com	Grand Portage Band of Lake Superior Chippewa	PO Box 428 Grand Portage, MN 55605	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Cheyenne	St. John	cheyenne.stjohn@lowersioux.com	Lower Sioux Tribal Community	39527 Reservation Hwy 1 Morton, MN 56270	Electronic Service	No	OFF_SL_22-538_Official CC Service List
LeRoy	Staples Fairbanks III	leroy.fairbanks@llojibwe.net	Leech Lake Band of Ojibwe	190 Sailstar Drive NW Cass Lake, MN 56633	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Byron E.	Starns	byron.starns@stinson.com	STINSON LLP	50 S 6th St Ste 2600 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Kristin	Stastny	kstastny@taftlaw.com	Taft Stettinius & Hollister LLP	2200 IDS Center 80 South 8th St Minneapolis, MN 55402	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Toby	Stephens	tobys@grandportage.com	Grand Portage Band of Lake Superior Chippewa	PO BOX 428 Grand Portage, MN 55605	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Cary	Stephenson	cStephenson@otpc.com	Otter Tail Power Company	215 South Cascade Street Fergus Falls, MN 56537	Electronic Service	No	OFF_SL_22-538_Official CC Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Mark	Strohfus	mstrohfus@greenergy.com	Great River Energy	12300 Elm Creek Boulevard Maple Grove, MN 553694718	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Carl	Strohlm	cjsmg@sbcglobal.net	SBC Global	105 East Edgewood Ave Indianapolis, IN 46227	Electronic Service	No	OFF_SL_22-538_Official CC Service List
James M	Strommen	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered	150 S 5th St Ste 700 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Samuel	Strong	Sam.strong@redlakenation.org	Red Lake Nation	15484 Migizi Drive Red Lake, MN 56671	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Tom	Swafford	tswafford@umsi.us	Utility Mapping Services, Inc	3947 E Calvary Rd Suite 103 Duluth, MN 55803	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Eric	Swanson	eswanson@winthrop.com	Winthrop & Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Todd	Tadych	ttadych@atcllc.com	American Transmission Company LLC	5303 Fen Oak Dr Madison, WI 53718	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Camille	Tanhoff	kamip@upperSiouxcommunity-nsn.gov	Upper Sioux Community	5722 Travers Lane PO BOX 147 Granite Falls, MN 56241	Electronic Service	No	OFF_SL_22-538_Official CC Service List
JoAnn	Thompson	jthompson@otpc.com	Otter Tail Power Company	P.O. Box 496 215 South Cascade Street Fergus Falls, MN 565380496	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Stuart	Tommerdahl	stommerdahl@otpc.com	Otter Tail Power Company	215 S Cascade St PO Box 496 Fergus Falls, MN 56537	Electronic Service	No	OFF_SL_22-538_Official CC Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Jayme	Trusty	execdir@swrdc.org	SWRDC	2401 Broadway Ave #1 Slayton, MN 56172	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Caralyn	Trutna	carrie@upperSiouxcommunity-nsn.gov	Upper Sioux Community	Upper Sioux Community P.O. Box 147 Granite Falls, MN 55372	Electronic Service	No	OFF_SL_22-538_Official CC Service List
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	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Leonard	Wabasha	leonard.wabasha@shakopeedakota.org	Shakopee Mdewakanton Sioux Community	2300 Tiwahe Circle Shakopee, MN 55379	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Caren	Warner	caren.warner@state.mn.us	Department of Commerce	85 7th Place East Suite 280 St. Paul, MN 55101-2198	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Luke	Warnsholz	lwarnsholz@boisforten-sn.gov	Bois Forte Band of Chippewa	Bois Forte Tribal Government 5344 Lakeshore Drive Nett Lake, MN 55772	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Cynthia	Warzecha	cynthia.warzecha@state.mn.us	Minnesota Department of Natural Resources	500 Lafayette Road Box 25 St. Paul, MN 55155-4040	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Elizabeth	Wefel	eawefel@flahertyhood.com	Flaherty & Hood, P.A.	525 Park St Ste 470 Saint Paul, MN 55103	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Heather	Westra	heather.westra@pic.org	Prairie Island Indian Community	5636 Sturgeon Lake Rd Welch, MN 55089	Electronic Service	No	OFF_SL_22-538_Official CC Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Alan	Whipple	sa.property@state.mn.us	Minnesota Department Of Revenue	Property Tax Division 600 N. Robert Street St. Paul, MN 551463340	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Steve	White	steve.white@llojbwe.net	Leech Lake Band of Ojibwe	190 Sailstar Drive NW Cass Lake, MN 56633	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Deanna	White	mncwa@cleanwater.org	Clean Water Action & Water Fund of MN	330 S 2nd Ave Ste 420 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Noah	White	noah.white@piic.org	Prairie Island Indian Community	5636 Sturgeon Lake Road Welch, MN 55089	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Cody	Whitebear	cody.whitebear@piic.org	Prairie Island Indian Community	5636 Sturgeon Lake Road Welch, MN 55089	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Rachel	Wiedewitsch	wiedewitsch@fresh-energy.org	Fresh Energy	408 St Peter St #350 St. Paul, MN 55102	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Mike	Wilson	Mike.Wilson@millelacsband.com	Mille Lacs Band of Ojibwe	43408 Odena Dr Onamia, MN 56359	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Virgil	Wind	virgil.wind@millelacsband.com	Mille Lacs Band of Ojibwe	43408 Odena Drive Onamia, MN 56359	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Joseph	Windler	jwindler@winthrop.com	Winthrop & Weinstine	225 South Sixth Street, Suite 3500 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Terry	Wolf	terry.wolf@mrenergy.com	Missouri River Energy Services	3724 W Avera Dr PO Box Sioux Falls, SD 571098920	Electronic Service	No	OFF_SL_22-538_Official CC Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Jonathan	Wolfgram	Jonathan.Wolfgram@state.mn.us	Office of Pipeline Safety	445 Minnesota St Ste 147 Woodbury, MN 55125	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Laurie	York	laurie.york@whiteearth-nsn.gov	White Earth Reservation Business Committee	PO Box 418 White Earth, MN 56591	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Ian	Young	IanYoung@FDLREZ.COM	Fond du Lac Band of Lake Superior Chippewa	1720 Big Lake Road Cloquet, MN 55720	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Kurt	Zimmerman	kwz@ibew160.org	Local Union #160, IBEW	2909 Anthony Ln St Anthony Village, MN 55418-3238	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Patrick	Zomer	Pat.Zomer@lawmoss.com	Moss & Barnett PA	150 S 5th St #1200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_22-538_Official CC Service List