

**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 Northern States Power Co.’s, Docket No. E-002/M-25-289
d/b/a Xcel Energy’s, Petition for Approval of
Large General Time of Day Service
Customers and Large Peak Controlled Time
of Day Service Tariffs

SUPPLEMENTAL COMMENTS OF GERONIMO POWER, LLC

INTRODUCTION

Geronimo Power, LLC (“Geronimo Power”) respectfully submits these supplemental comments in response to the Minnesota Public Utilities Commission’s (“Commission”) October 21, 2025 Notice of New Supplemental Comment Period.¹ In its Initial Comments, Geronimo Power recommended, among other things, that Xcel Energy (“Xcel”) modify its proposed tariffs to explicitly authorize and encourage new large data center customers to meet their load through co-located generation, either behind-the-meter (“BTM”) or traditional transmission-interconnected generation that is geographically proximate to the load.² Geronimo Power also recommended that Xcel implement an expedited load interconnection study process for new co-located data center load and generation. Several parties, including the Clean Grid Alliance (“CGA”), the Citizens Utility Board of Minnesota (“CUB”), the Data Center Coalition (“DCC”), and the Environmental Law and Policy Center and Vote Solar (“ELPC/VS”), likewise expressed support for co-located/on-site generation and/or expedited interconnection timelines.³

For its part, Xcel Energy indicated that it is “actively reviewing the potential for” prioritizing data center load interconnection requests, but that proposals related to co-located generation or feedback of power from such generators onto Xcel’s system are “outside the scope of the present docket” and “better handled in a separate docket so that all appropriate parties can participate.”⁴

¹ See Doc. ID No. [202510-224121-01](#).

² See generally Initial Comments of Geronimo Power, LLC, at 3, 10–11 (Oct. 13, 2025) (Doc. ID No. [202510-223849-01](#)) (hereinafter “Geronimo Power Initial Comments”).

³ See Initial Comments of Clean Grid Alliance, at 8–15 (Oct. 13, 2025) (Doc. ID No. [202510-223819-01](#)); Initial Comments of the Citizens Utility Board of Minnesota, at 10–11 (Oct. 13, 2025) (Doc. ID No. [202510-223879-01](#)); Data Center Coalition Reply Comments, at 6–7 (Nov. 5, 2025) (Doc. ID No. [202511-224688-01](#)); Initial Comments of Environmental Law & Policy Center and Vote Solar, at 11–12 (Oct. 13, 2025) (Doc. ID No. [202510-223876-01](#)).

⁴ See Xcel Energy Reply Comments, at 33 (Nov. 5, 2025) (Doc. ID No. [202511-224681-01](#)) (hereinafter “Xcel Reply”).

Geronimo Power respectfully disagrees. In its initial Notice of Comment Period, the Commission requested comment on (among other things) whether Xcel’s proposed new tariffs for large load data centers comply with Order Point 32 from Xcel’s most recent Integrated Resource Plan (“IRP”) and Firm Dispatchable Generation procurement proceeding (Docket Nos. 24-67 and 23-212) and Minn. Stat. § 216B.1622.⁵ Both the order and the statute address what resources Xcel will use to serve new large data center customers, how costs associated with serving those customers will be allocated to such customers, and how the proposed tariffs will ensure affordability and prevent other customers from being at risk for paying stranded costs.⁶ Authorizing co-located generation and expediting the load interconnection process for new large data center customers can (among other things) produce significant system benefits and reduce risks for both the utility and its customers.⁷ These issues are clearly relevant to the topics the Commission identified in its initial notice for this proceeding. It is important that Xcel develop a robust and comprehensive tariff that addresses these matters *now*, given the significant potential near-term load growth from data center customers.

The Commission should decline Xcel’s invitation to defer issues related to data center co-location and load interconnection to some undefined, future proceeding. The rapid growth of large load users, many of which are hyperscale data centers, has brought these issues to the forefront of the electric power sector.⁸ This new era of energy provision necessitates certainty regarding the co-location of wind and solar facilities with new data centers, given that federal production and investment tax credits for such facilities will be phased out in the next several years. It is therefore important that Xcel take proactive steps to address these issues in its proposed tariffs now. Geronimo Power respectfully requests that the Commission order Xcel to revise its tariffs to incorporate recommendations from Geronimo Power regarding co-located generation and load interconnection timelines for large data center customers.

DISCUSSION

In its initial comments, Geronimo Power explained how co-locating large data center customers with generation resources can deliver significant benefits, including reducing transmission congestion, optimizing utilization of existing or new infrastructure, delivering economic benefits to local communities, promoting development of clean energy resources, and reducing costs and minimizing impact associated with those large loads.⁹ Geronimo Power therefore recommended that the Commission require Xcel to modify its tariffs to authorize and encourage data center customers to meet all or a portion of their load through co-located generation resources.¹⁰ In reply, Xcel did not meaningfully or substantively address Geronimo Power’s

Comments”).

⁵ See Notice of Comment Period (Jul. 29, 2025) (Doc. ID No. [20257-221060-01](#)).

⁶ See *In Re Xcel Energy’s 2024–2040 Upper Midwest Integrated Resource Plan*, Docket No. E-002/RP-24-67, *Order Approving Settlement Agreement with Modifications*, at 25–26 (Apr. 21, 2025) (Doc. ID No. [20254-217941-01](#)) (hereinafter “IRP Order”); Minn. Stat. § 216B.1622, Subd. 2.

⁷ Geronimo Power Initial Comments, at 3–9.

⁸ See, e.g., Secretary of Energy, *Ensuring the Timely and Orderly Interconnection of Large Loads, Advanced Notice of Proposed Rulemaking* (Oct. 23, 2025), available at <https://tinyurl.com/mr3shupu>.

⁹ Geronimo Power Initial Comments, at 5–8.

¹⁰ *Id.* at 10.

comments and instead suggested that “change[s] of this magnitude would be better handled in a separate docket so that all appropriate parties can participate.”¹¹

Respectfully, Geronimo Power believes this would be a mistake. The purpose of this docket is for the Commission to consider whether it will approve Xcel’s new proposed tariffs for large data center customers. The issues Geronimo Power and others have raised regarding co-location and load interconnection timelines are clearly germane to Xcel’s proposed tariffs. Approximately a dozen parties representing a variety of stakeholder interests are participating in this case and have offered comments on Xcel’s proposed tariffs. Xcel does not explain how or why it is necessary to hold another proceeding (of undefined scope and at some undefined time) to address these matters, or which other “appropriate parties” could participate in that case who have not already participated here.

In this time of substantial projected load growth, the Commission’s dual objectives of maintaining grid reliability and affordability necessitate considering all options for mitigating the risks of new large loads. Co-location of load and generation, either through BTM or traditional transmission-interconnected generation physically proximate to the load, could serve as a natural hedge against the massive increase in load with the hyperscale large load users coming online. As noted in Geronimo Power’s initial comments, having large loads be financially responsible for part or all of their own generation would serve as insulation to other ratepayers, helping to meet the Commission’s affordability objectives.¹² Pairing load with new generation would also help improve reliability by ensuring there is sufficient available capacity to meet significant increases in electric demand; indeed, reliability of the bulk power system was a key consideration behind the Department of Energy’s (“DOE”) recent Advanced Notice of Proposed Rulemaking (“ANOPR”).¹³ Co-locating a large load’s own load and generation is a viable strategy for hedging the changes new large loads will have on the system.

Indeed, the co-location of data center load and generation—and the interconnection process for these loads and resources—is a critical emerging issue in the electric power industry. Several regional transmission organizations (“RTOs”)—including the Southwest Power Pool and Midcontinent Independent System Operator, Inc.—are examining ways to expedite the large load interconnection study request process.¹⁴ Similarly, DOE’s recent ANOPR requests comment on potential reforms to ensure the timely and orderly interconnection of large loads to the transmission system.¹⁵ DOE noted that:

In light of the unprecedented current and expected growth of large loads seeking to interconnect to the transmission system, and to provide open access and non-discriminatory access to the transmission system, it has become necessary to standardize interconnection procedures and agreements for such loads, including those seeking to share a point of interconnection with new

¹¹ Xcel Reply Comments, at 33.

¹² Geronimo Power Initial Comments, at 7.

¹³ See *supra* note 8, at 2, 14.

¹⁴ Geronimo Power Initial Comments, at 2, 5

¹⁵ See *supra* note 8.

or existing generation facilities (hybrid facilities).¹⁶

DOE identified several principles that should inform its reforms, including the need to study load and hybrid facilities together with generating facilities (to the extent practicable) and the potential to expedite interconnection studies for large loads or hybrid facilities that are curtailable and/or dispatchable.¹⁷ The agency also noted that states will continue to play a role over the siting of generation resources and retail sales of electricity to large load customers.¹⁸

The ANOPR demonstrates that state utility commissions such as this one have an important role to play in addressing the challenges and opportunities from new large data center customers. It further demonstrates the need for prompt, decisive action that enables those customers to connect to the system in a timely, orderly, and efficient manner. As Geronimo Power explained in its initial comments, these objectives can be achieved by enabling and incentivizing these customers to “bring their own generation” to satisfy all or a portion of their load through co-located generation.¹⁹

Encouraging the co-location of data center load and generation may also help bring needed clean, carbon-free capacity online in an efficient and cost-effective manner. Co-location may be able to bring capacity to operation more quickly than existing resource planning and procurement processes, which tend to be slower and more deliberate. Wind and solar facilities that come online in the next couple years can also take advantage of expiring federal tax credits, which will reduce their overall installed cost relative to future projects that come online after tax credit expiration. Allowing these facilities to be co-located with large data center load would therefore enable the lowest cost capacity to be deployed faster.

Additionally, enabling new large loads to bring their own generation would position the state to take advantage of the opportunities resulting from the ANOPR and how FERC will increasingly play a role in load interconnection in spring of 2026 and beyond. By creating a pathway that facilitates the co-location of data centers and power sources, Minnesota could help to unlock tangible economic benefits, such as tax revenue and jobs from large load users.

Finally, expediting the interconnection process for large loads with co-located generation would dovetail well with the aforementioned initiatives from RTOs and DOE. Xcel indicates that it is “actively reviewing the potential for prioritization” based on factors like “new technical solution partnerships, on-site generation, DSM, timing to energization, or a line of sight to an end user vs. a prospective request submitted by a developer.”²⁰ While we commend Xcel for giving

¹⁶ *Id.* at 8–9.

¹⁷ *Id.* at 11–12.

¹⁸ *Id.* at 9.

¹⁹ Geronimo Power Initial Comments, at 5–8. The DCC asserts that “[i]f advantages are provided to customers that support additional clean energy deployment, those advantages should apply regardless of whether the clean energy resource(s) the customer supports are located onsite, adjacent to the customer’s property, or somewhere else in Xcel’s service territory.” DCC Reply Comments, at 7. However, as Geronimo Power explained in its initial comments, it makes most sense to incentivize the siting of co-located generation that is physically proximate to the data center load, as this can reduce transmission congestion and optimize the use of existing infrastructure, especially in areas where there is excess transmission or substation capacity. Geronimo Power Initial Comments, at 5–6. Large load users utilizing co-located generation in areas that are geographically or electrically “distant” to the load could potentially exacerbate existing transmission constraints and/or negatively impact wholesale market prices.

²⁰ Initial Comments of Environmental Law & Policy Center and Vote Solar, at Attachment 3 (Oct. 13, 2025) (Doc. ID

consideration to this important issue, decisive action is needed to reliably and efficiently interconnect these new large loads to the grid. Geronimo Power therefore reiterates its initial recommendation for Xcel to implement an expedited load interconnection study process for new data center loads that are co-located with new or existing generation.

CONCLUSION

Geronimo Power appreciates the Commission's consideration of these comments on the Company's proposal. We believe it is of paramount importance for Xcel's proposed tariffs to authorize and encourage large load data center customers to utilize co-located generation and to expedite the interconnection process for such customers. We encourage the Commission to disregard Xcel's request to defer these matters to future proceedings and instead address them now, as part of the proposed tariffs it has presented in this case.

Dated: December 5, 2025

Respectfully submitted,

/s/ David R. Zoppo

David R. Zoppo

Sara Bergan

Ian Johnson

Husch Blackwell LLP

33 East Main Street, Suite 300

Madison, WI 53703

david.zoppo@huschblackwell.com

sara.bergan@huschblackwell.com

ian.johnson@huschblackwell.com

Attorneys for Geronimo Power, LLC

CERTIFICATE OF SERVICE

I, David R. Zoppo, hereby certify that on this 5th day of December 2025, I e-filed with the eDocket System the following document(s) and have served copies of the same on the attached list of persons by electronic filing, electronic mail, or United States mail.

Supplemental Comments of Geronimo Power, LLC

In the Matter of Northern States Power Co.'s, d/b/a Xcel Energy's, Petition for Approval of Large General Time of Day Service Customers and Large Peak Controlled Time of Day Service Tariffs

MPUC Docket No. E-002/M-25-289

Dated this 5th day of December, 2025.

/s/ David R. Zoppo

David R. Zoppo

#	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	M-25-289
2	Jared	Alholinna	jaholinna@greenergy.com	Great River Energy		12300 Elm Creek Boulevard Maple Grove MN, 55369 United States	Electronic Service		No	M-25-289
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	M-25-289
4	Shannon	Anderson	sanderson@solarunitedneighbors.org	Solar United Neighbors			Electronic Service		No	M-25-289
5	Beren	Argetsinger	bargetsinger@keyesfox.com			PO BOX 166 Burdett NY, 14818 United States	Electronic Service		No	M-25-289
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	M-25-289
7	Mark	Bakk	mbakk@lcp.coop	Lake Country Power		26039 Bear Ridge Drive Cohasset MN, 55721 United States	Electronic Service		No	M-25-289
8	Daniel	Becchetti	dbecchetti@greenergy.com	Great River Energy		12300 Elm Creek Boulevard Maple Grove MN, 55369 United States	Electronic Service		No	M-25-289
9	Todd	Beck	tbeck@greenergy.com			null null, null United States	Electronic Service		No	M-25-289
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	M-25-289
11	Melanie	Benjamin	melanie.benjamin@millelacsband.com			43408 Oodena Drive Onamia MN, 56359 United States	Electronic Service		No	M-25-289
12	Sasha	Bergman	sasha.bergman@state.mn.us		Public Utilities Commission		Electronic Service		Yes	M-25-289
13	Laura	Bishop	laura.bishop@state.mn.us		Minnesota Pollution Control Agency	520 Lafayette Rd Saint Paul MN, 55155 United States	Electronic Service		No	M-25-289
14	Ingrid	Bjorklund	ingrid@bjorklundlaw.com	Bjorklund Law, PLLC		855 Village Center Drive #256	Electronic Service		No	M-25-289

#	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	M-25-289
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	M-25-289
17	Sheldon	Boyd	sheldon.boyd@millelacsband.com	Mille Lacs Band of Ojibwe		43408 Oodena Drive Onamia MN, 56359 United States	Electronic Service		No	M-25-289
18	Jon	Brekke	jbrekke@greenergy.com	Great River Energy		12300 Elm Creek Boulevard Maple Grove MN, 55369-4718 United States	Electronic Service		No	M-25-289
19	Matthew	Brodin	mbrodin@allete.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	M-25-289
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	M-25-289
21	Marvin Ray	Bruneau	marvin.bruneau@millelacsband.com	Mille Lacs Band of Ojibwe		43408 Oodena Drive Onamia MN, 56359 United States	Electronic Service		No	M-25-289
22	Christina	Brusven	cbrusven@fredlaw.com	Fredrikson Byron		60 S 6th St Ste 1500 Minneapolis MN, 55402-4400 United States	Electronic Service		No	M-25-289
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	M-25-289
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	M-25-289
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	M-25-289
26	Mike	Bull	mike.bull@state.mn.us		Public Utilities Commission	121 7th Place East, Suite 350 St. Paul MN,	Electronic Service		Yes	M-25-289

#	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	M-25-289
28	Marc	Child	mchild@greenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	M-25-289
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	M-25-289
30	John	Coffman	john@johncoffman.net	AARP		871 Tuxedo Blvd. St. Louis MO, 63119-2044 United States	Electronic Service		No	M-25-289
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	M-25-289
32	George	Crocker	gwillc@nawo.org	North American Water Office		5093 Keats Avenue Lake Elmo MN, 55042 United States	Electronic Service		No	M-25-289
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	M-25-289
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	M-25-289
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	M-25-289
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	M-25-289
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	M-25-289
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	M-25-289

#	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	M-25-289
40	Ian M.	Dobson	ian.m.dobson@xcelenergy.com	Xcel Energy		414 Nicollet Mall, 401-8 Minneapolis MN, 55401 United States	Electronic Service		No	M-25-289
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	M-25-289
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	M-25-289
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	M-25-289
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	M-25-289
45	Kevin	Dupuis, Sr.	kevindupuis@fdlrez.com			Reservation Business Committee 1720 Big Lake Rd Cloquet MN, 55720 United States	Electronic Service		No	M-25-289
46	Jamie	Edwards	jamie.edwards@millelacsband.com	Mille Lacs Band of Ojibwe		43408 Oodena Drive Onamia MN, 56358 United States	Electronic Service		No	M-25-289
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	M-25-289
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	M-25-289
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	M-25-289
50	Terri	Finn	terri.goggleye@llojibwe.net			null null, null United States	Electronic Service		No	M-25-289
51	Christine	Fox	cfox@itasca-mantrap.com	Itasca-Mantrap Coop. Electric Assn.		PO Box 192 Park Rapids MN, 56470 United States	Electronic Service		No	M-25-289
52	Lucas	Franco	lfranco@liunagroc.com	LIUNA		81 Little Canada Rd E Little Canada MN, 55117 United States	Electronic Service		No	M-25-289

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
53	Gary	Frazer	gfrazier@mnchippewatribe.org	Minnesota Chippewa Tribe		PO Box 217 Cass Lake MN, 56633 United States	Electronic Service		No	M-25-289
54	Stacey	Fujii	sfujii@grenergy.com	Great River Energy		12300 Elm Creek Boulevard Maple Grove MN, 55369-4718 United States	Electronic Service		No	M-25-289
55	Edward	Garvey	garveyed@aol.com	Residence		32 Lawton St Saint Paul MN, 55102 United States	Electronic Service		No	M-25-289
56	Shannon	Geshick	shannon.geshick@state.mn.us	Minnesota Indian Affairs Council (MIAC)		null null, null United States	Electronic Service		No	M-25-289
57	Allen	Gleckner	gleckner@fresh-energy.org	Fresh Energy		408 St. Peter Street Ste 350 Saint Paul MN, 55102 United States	Electronic Service		No	M-25-289
58	Jeffrey	Haase	jhaase@grenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	M-25-289
59	Hal	Halpern	halhalpern@clpower.com	Cooperative Light & Power		1554 Hwy 2 PO Box 69 Two Harbors MN, 55616 United States	Electronic Service		No	M-25-289
60	Jeremy	Hamilton	jhamilton@uppersiouxcommunity-nsn.gov	Upper Sioux Community		Upper Sioux Community PO Box 147 Granite Falls MN, 56241 United States	Electronic Service		No	M-25-289
61	David A.	Hansen	hansen@federatedrea.coop	Federated Rural Electric Association		77100 U.S. Highway 71 PO Box 69 Jackson MN, 56143 United States	Electronic Service		No	M-25-289
62	Amy	Hastings	amyh@uppersiouxcommunity-nsn.gov	Upper Sioux Community		5722 Travers Lane PO Box 147 Granite Falls MN, 56241 United States	Electronic Service		No	M-25-289
63	Erik	Hatlestad	erik@cureriver.org			117 1st St Montevideo MN, 56265 United States	Electronic Service		No	M-25-289
64	Adam	Heinen	aheinen@dakotaelectric.com	Dakota Electric Association		4300 220th St W Farmington MN, 55024 United States	Electronic Service		No	M-25-289
65	Kristin	Henry	kristin.henry@sierraclub.org	Sierra Club		2101 Webster St Ste 1300 Oakland CA, 94612 United States	Electronic Service		No	M-25-289
66	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-25-289

#	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	M-25-289
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	M-25-289
69	John	Ihle	ljihle@rrt.net	PlainStates Energy LLC		27451 S Hwy 34 Barnesville MN, 56514 United States	Electronic Service		No	M-25-289
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	M-25-289
71	Faron	Jackson, Sr.	faron.jackson@llojibwe.net			190 Sailstar Drive NW Cass Lake MN, 56633 United States	Electronic Service		No	M-25-289
72	Justin	Jahnz	justin.jahnz@ecemn.com	East Central Energy		412 Main Ave N Braham MN, 55006 United States	Electronic Service		No	M-25-289
73	Alan	Jenkins	aj@jenkinsatlaw.com	Jenkins at Law		2950 Yellowtail Ave. Marathon FL, 33050 United States	Electronic Service		No	M-25-289
74	Kevin	Jensvold	kevinj@uppersiouxcommunity-nsn.gov	Upper Sioux Community		PO Box 147 Granite Falls MN, 56241-0147 United States	Electronic Service		No	M-25-289
75	Annette	Johnson	annette.johnson@redlakenation.org	Red Lake Nation		15484 Migizi Drive Red Lake MN, 56671 United States	Electronic Service		No	M-25-289
76	Jody	Johnson	jody.johnson@piic.org	Prairie Island Indian Community		5636 Sturgeon Lake Rd Welch MN, 55089 United States	Electronic Service		No	M-25-289
77	Richard	Johnson	rick.johnson@lawmoss.com	Moss & Barnett		150 S. 5th Street Suite 1200 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-289
78	Sarah	Johnson Phillips	sjphillips@stoel.com	Stoel Rives LLP		33 South Sixth Street Suite 4200 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-289
79	Mark	Kaminski	mark.kaminski@gsa.gov	General Services Administration		1800 F Street NW Washington DC, 20405 United States	Electronic Service		No	M-25-289
80	Veda	Kanitz	vmkanitz@gmail.com			null null, null United States	Electronic Service		No	M-25-289

#	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	M-25-289
82	David	Kempf	dkempf@greenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	M-25-289
83	William	Kenworthy	will@votesolar.org			1 South Dearborn St Ste 2000 Chicago IL, 60603 United States	Electronic Service		No	M-25-289
84	Bobby	King	bking@solarunitedneighbors.org	Solar United Neighbors		3140 43rd Ave S Minneapolis MN, 55406 United States	Electronic Service		No	M-25-289
85	Therese	LaCanne	tlacanne@greenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	M-25-289
86	Matthew	Lacey	mlacey@greenergy.com	Great River Energy		12300 Elm Creek Boulevard Maple Grove MN, 55369-4718 United States	Electronic Service		No	M-25-289
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	M-25-289
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	M-25-289
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	M-25-289
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	M-25-289
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	M-25-289
92	Dan	Leshner	dlesher@greenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	M-25-289
93	Michelle	Lommel	mlommel@greenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	M-25-289

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
94	Kavita	Maini	kmains@wi.rr.com	KM Energy Consulting, LLC		961 N Lost Woods Rd Oconomowoc WI, 53066 United States	Electronic Service		No	M-25-289
95	Christine	Marquis	regulatory.records@xcelenergy.com	Xcel Energy		414 Nicollet Mall MN1180-07-MCA Minneapolis MN, 55401 United States	Electronic Service		Yes	M-25-289
96	Shena	Matrious	shena.matrious@millelacsband.com	Mille Lacs Band of Ojibwe		43408 Oodena Drive Onamia MN, 56349 United States	Electronic Service		No	M-25-289
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	M-25-289
98	Ronald	Meier	rmeier@mcleodcoop.com	Mcleod Cooperative Power		3515 11th St East Glencoe MN, 55336 United States	Electronic Service		No	M-25-289
99	Peder	Mewis	pmewis@cleangridalliance.org	Clean Grid Alliance		570 Asbury St. St. Paul MN, 55104 United States	Electronic Service		No	M-25-289
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	M-25-289
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	M-25-289
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	M-25-289
103	David	Moeller	dmoeller@allete.com	Minnesota Power			Electronic Service		No	M-25-289
104	Sarah	Mooradian	sarah@curemn.org	CURE		117 South 1st Street Montevideo MN, 56265 United States	Electronic Service		No	M-25-289
105	Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP		33 South Sixth St Ste 4200 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-289
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	M-25-289

#	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	M-25-289
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	M-25-289
109	Sonny	Myers	smyers@1854treatyauthority.org	1854 Treaty Authority		4428 Haines Rd Duluth MN, 55811-1524 United States	Electronic Service		No	M-25-289
110	Pouya	Najmaie	najm0001@gmail.com	Cooperative Energy Futures		3416 16th Ave S Minneapolis MN, 55407 United States	Electronic Service		No	M-25-289
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	M-25-289
112	Deb	Nelson	dnelson@greenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	M-25-289
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	M-25-289
114	Duane	Ninneman	duane@cureriver.org	Clean Up the River Environment		117 South 1st St Montevideo MN, 56265 United States	Electronic Service		No	M-25-289
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	M-25-289
116	Joseph	OBrien	joey.obrien@lowersioux.com			39527 Highway 1 Morton MN, 56270 United States	Electronic Service		No	M-25-289
117	Carol A.	Overland	overland@legalectric.org	Legalelectric - Overland Law Office		1110 West Avenue Red Wing MN, 55066 United States	Electronic Service		No	M-25-289
118	Gregory	Padden	gpadden@greenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	M-25-289
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		No	M-25-289

#	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	M-25-289
121	Priti	Patel	ppatel@grenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369-4718 United States	Electronic Service		No	M-25-289
122	Earl	Pendleton	earl.pendleton@lowersioux.com	Lower Sioux Indian Community		39527 Highway 1 Morton MN, 56270 United States	Electronic Service		No	M-25-289
123	Gordon	Pietsch	gpietsch@grenergy.com	Great River Energy		12300 Elm Creek Blvd. Maple Grove MN, 55369-4718 United States	Electronic Service		No	M-25-289
124	Joe	Plumer	joe.plumer@redlakenation.org	Red Lake Nation		15484 Migizi Drive Red Lake MN, 56671 United States	Electronic Service		No	M-25-289
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	M-25-289
126	Robert	Prescott	bob.prescott@lowersioux.com	Lower Sioux Indian Community		39527 Highway 1 Morton MN, 56270 United States	Electronic Service		No	M-25-289
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	M-25-289
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	M-25-289
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	M-25-289
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	M-25-289
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	M-25-289

#	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	M-25-289
133	Zachary	Ruzycki	zruzycki@grenergy.com	Great River Energy		12300 Elm Creek Boulevard Maple Grove MN, 55369 United States	Electronic Service		No	M-25-289
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	M-25-289
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	M-25-289
136	Ronald J.	Schwartau	rschwartau@noblesce.com	Nobles Electric Cooperative		22636 U.S. Hwy. 59 Worthington MN, 56187 United States	Electronic Service		No	M-25-289
137	Jessie	Seim	jessie.seim@piic.org	Prairie Island Indian Community		5636 Sturgeon Lake Rd Welch MN, 55089 United States	Electronic Service		No	M-25-289
138	Darrell	Seki, Sr.	dseki@redlakenation.org			15484 Migizi Drive Red Lake MN, 56671 United States	Electronic Service		No	M-25-289
139	Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates		7400 Lyndale Ave S Ste 190 Richfield MN, 55423 United States	Electronic Service		No	M-25-289
140	Joel	Smith	jsmith@mnchippewatribe.org	Minnesota Chippewa Tribe		PO Box 217 Cass Lake MN, 56633 United States	Electronic Service		No	M-25-289
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	M-25-289
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	M-25-289
143	Roger	Smith, Sr.	rogermsmithsr@fdrez.com			1720 Big Lake Road Cloquet MN, 55720 United States	Electronic Service		No	M-25-289
144	Beth	Soholt	bsoholt@cleangridalliance.org	Clean Grid Alliance		570 Asbury Street Suite 201 St. Paul MN, 55104 United States	Electronic Service		No	M-25-289
145	Marie	Spry	mariespry@grandportage.com			PO Box 428 Grand	Electronic Service		No	M-25-289

#	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	M-25-289
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	M-25-289
148	Byron E.	Starns	byron.starns@stinson.com	STINSON LLP		50 S 6th St Ste 2600 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-289
149	Mark	Strohfus	mstrohfus@grenergy.com	Great River Energy		12300 Elm Creek Boulevard Maple Grove MN, 55369-4718 United States	Electronic Service		No	M-25-289
150	Samuel	Strong	sam.strong@redlakenation.org	Red Lake Nation		15484 Migizi Drive Red Lake MN, 56671 United States	Electronic Service		No	M-25-289
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	M-25-289
152	David	Sunderman	daves@benco.org	BENCO (DUPLICATE)		PO Box 8 Mankato MN, 56002-0008 United States	Electronic Service		No	M-25-289
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	M-25-289
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	M-25-289
155	Geoffrey	Tolley	geoff.tolley@gmail.com			855 Stanley Road Two Harbors MN, 55616-1176 United States	Electronic Service		No	M-25-289
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	M-25-289
157	Jackie	Van Norman	jvannorman@grenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	M-25-289
158	Sam	Villella	sdvillella@gmail.com			10534 Alamo Street NE Blaine MN, 55449 United States	Electronic Service		No	M-25-289

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
159	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	M-25-289
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	M-25-289
161	Trent	Waite	twaite@grenergy.com			null null, null United States	Electronic Service		No	M-25-289
162	Heather	Westra	heather.westra@piic.org	Prairie Island Indian Community		5636 Sturgeon Lake Rd Welch MN, 55089 United States	Electronic Service		No	M-25-289
163	Steve	White	steve.white@llojbwe.net	Leech Lake Band of Ojibwe		190 Sailstar Drive NW Cass Lake MN, 56633 United States	Electronic Service		No	M-25-289
164	Cody	Whitebear	cody.whitebear@piic.org	Prairie Island Indian Community		5636 Sturgeon Lake Road Welch MN, 55089 United States	Electronic Service		No	M-25-289
165	John	Williams	jwilliams@grenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	M-25-289
166	Virgil	Wind	virgil.wind@millelacsband.com	Mille Lacs Band of Ojibwe		43408 Oodena Drive Onamia MN, 56359 United States	Electronic Service		No	M-25-289
167	Joseph	Windler	jwindler@winthrop.com	Winthrop & Weinstine		225 South Sixth Street, Suite 3500 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-289
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	M-25-289
169	Curtis	Zaun	czaun@mNSEIA.org	MnSEIA		PO Box 8141 Saint Paul MN, 55108 United States	Electronic Service		No	M-25-289
170	Kurt	Zimmerman	kwz@ibew160.org	Local Union #160, IBEW		2909 Anthony Ln St Anthony Village MN, 55418-3238 United States	Electronic Service		No	M-25-289
171	Patrick	Zomer	pat.zomer@lawmoss.com	Moss & Barnett PA		150 S 5th St #1200 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-289