

November 25, 2025

**VIA E-FILING**

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

**RE: In the Matter of the Application of Crane Energy Storage LLC for a Site Permit for the up to 200 MW Crane Energy Storage Project in Olmsted County, Minnesota  
Docket No. IP-7148/ESS-24-406**

**In the Matter of the Application of Sandhill Energy Storage LLC for a Site Permit for the up to 200 MW Sandhill Energy Storage Project in Olmsted County, Minnesota  
Docket No. IP-7149/ESS-24-407**

Dear Ms. Bergman:

Crane Energy Storage LLC (Crane Storage) and Sandhill Energy Storage LLC (Sandhill Storage) (together, Applicants) respectfully submit the Pre-Filed Direct Testimony of James Hingston, with Schedules A-F.

The documents referenced above have also been electronically filed today through [www.edockets.state.mn.us](http://www.edockets.state.mn.us). Also under separate cover, Applicants are providing hard copies of the Pre-Filed Direct Testimony of James Hingston, with Schedules A-F to Judge McKenzie as requested. A copy of this filing is also being served upon the persons on the Official Service Lists of record.

Please let me know if you have any questions regarding this filing.

Sincerely,

FREDRIKSON & BYRON, P.A.

*/s/ Jeremy P. Duehr*

Jeremy P. Duehr  
**Direct Dial:** 612.492.7413  
**Email:** [jduehr@fredlaw.com](mailto:jduehr@fredlaw.com)

JPD

# **Hingston Direct Testimony**

BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

In the Matter of Crane Energy Storage LLC for a Site Permit for the up to 200 MW  
Crane Energy Storage Project in Olmsted County, Minnesota

In the Matter of the Application of Sandhill Energy Storage LLC for a Site Permit for the  
up to 200 MW Sandhill Energy Storage Project in Olmsted County, Minnesota

MPUC Docket Nos. IP-7148/ESS-24-406 and IP-7149/ESS-24-407

CAH Docket No. 25-2500-40988

**DIRECT TESTIMONY OF JAMES HINGSTON  
ON BEHALF OF CRANE ENERGY STORAGE LLC AND SANDHILL ENERGY  
STORAGE LLC**

November 25, 2025

1 I. INTRODUCTION AND QUALIFICATIONS

2  
3 **Q. Please state your name, employer, and business address.**

4 A. My name is James Hingston. I am employed by U.S. Solar & Storage Holdings  
5 (USSH), which has a business address of 23761 Coronel Dr., Mission Viejo, CA  
6 92691. USSH provides development services to Copenhagen Infrastructure  
7 Partners (CIP), with a focus on local and state land-use permitting.

8  
9 **Q. Please briefly describe your educational background and professional  
10 experience.**

11 A. I have a Bachelor's Degree in Business Administration from the University of  
12 Massachusetts. I also have nearly nine years of experience in sustainable  
13 development, including three years of experience working directly on the  
14 development of battery energy storage systems (BESS).

15  
16 **Q. For whom are you testifying?**

17 A. I am testifying on behalf of Crane Energy Storage, LLC (Crane) and Sandhill  
18 Energy Storage, LLC (Sandhill) (collectively, the Applicants).

19  
20 **Q. What is the relationship between the Applicants and CIP?**

21 A. The Applicants are wholly owned subsidiaries of CIP, an infrastructure investment  
22 firm specializing in renewable energy and other essential infrastructure projects.  
23 They are known for their expertise in developing, financing, and managing critical  
24 infrastructure, particularly in the field of renewable energy. CIP has a strong track  
25 record of successfully developing and operating renewable energy projects  
26 globally, including in the United States. They have been involved in various phases  
27 of renewable energy projects, including project development, financing,  
28 construction, and long-term operation.

29 **Q. What is your role with respect to the Projects?**

30 A. I serve as the lead developer for these Projects, with a focus on environmental and  
31 land use permitting.

1 **II. PURPOSE OF TESTIMONY**

2 **Q. What is the purpose of your Direct Testimony?**

3 A. The purpose of my testimony is to: (1) provide an overview of the projects; (2)  
4 provide updates on the Sandhill project; (3) provide an update on the Crane  
5 project; (4) provide an update on the Site Plan; (5) describe the Applicant's  
6 coordination and consultation with the Minnesota State Historic Preservation  
7 Office (SHPO); (6) provide limited comments on the proposed draft site permits  
8 (DSPs) for the projects; and (7) discuss local employment and economic benefits.

9  
10 **Q. What schedules are attached to your Direct Testimony?**

11 A. The following schedules are attached to my Direct Testimony:

- 12 • **SCHEDULE A**: Statement of Qualifications
- 13 • **Schedule B**: Archeological Inventories - Correspondence with Shakopee  
14 Mdewakanton Sioux Community
- 15 • **SCHEDULE C**: Xcel Energy's Expedited Resource Addition Study (ERAS)  
16 Filing Letter
- 17 • **SCHEDULE D**: Minnesota Public Utilities Commission (Commission) Relevant  
18 Retail Electric Regulatory Authority (RERRA) Verification Form
- 19 • **SCHEDULE E**: Xcel Energy's ERAS Update
- 20 • **SCHEDULE F**: Notice of Decision (NOD) & Approved Wetland Boundary Map

21  
22 **III. PROJECT OVERVIEW**

23 **Q. Please provide a summary of the projects, including the proposed location**  
24 **and proposed site.**

25 A. Applicants propose two adjacent stand-alone BESS—the Crane Energy Storage  
26 Project (Crane Project) and the Sandhill Energy Storage Project (Sandhill  
27 Project)—in Kalmar Township, Olmsted County, Minnesota (collectively, the  
28 Projects). Each stand-alone BESS will have a power rating of up to 200-megawatts  
29 (MW) / 800-megawatt hours (MWh). The Projects will interconnect at the Southern  
30 Minnesota Municipal Power Agency's (SMMPA) existing Byron Substation (the  
31 "Byron Substation"), located roughly 370 feet south of the Land Control Areas, via

1 an approximately 700-foot, 161-kilovolt (kV) generation tie line (gen-tie). Each  
2 facility will charge from the transmission grid, store energy, and discharge back  
3 through the same point. The Projects are designed to share a primary access road,  
4 a collector substation, and a gen-tie line. Preliminary layouts anticipate  
5 approximately 236 self-contained BESS enclosures per facility. Equipment will  
6 include inverters, transformers, emergency and battery management systems, a  
7 collector substation, and a bi-directional gen-tie line to the Byron Substation.

8  
9 The Crane Land Control Area encompasses approximately 36.3 acres, of which  
10 approximately 35.6 acres will comprise the Crane Preliminary Development Area;  
11 approximately 14.8 acres will host BESS operational components. The Sandhill  
12 Land Control Area encompasses approximately 42.7 acres, of which about 39.9  
13 acres comprise the Sandhill Preliminary Development Area; approximately 13.3  
14 acres will host BESS operational components.

15  
16 Because the Projects share the access road, collector substation, and gen-tie line  
17 corridor, there is overlapping acreage: 19.2 acres of the Sandhill Land Control Area  
18 overlaps with and is already accounted for in the Crane Land Control Area.  
19 Similarly, about 18.7 acres of the Sandhill Preliminary Development Area overlaps  
20 with and is accounted for in the Crane Preliminary Development Area.

21  
22 **Q. Why did Applicants choose the Project Areas as presented in the Application**  
23 **to build the Projects?**

24 A. Applicants considered several factors, including existing and planned renewable  
25 energy projects in the region, environmental constraints, land availability, and cost.  
26 The feasibility of interconnection to existing transmission was also considered in  
27 determining the Projects' location.

28  
29 From there, Applicants narrowed the consideration to locations with sufficient open  
30 space and located near substations and transmission lines with existing capacity  
31 to accommodate additional electricity traffic, where the grid would benefit from

1 stand-alone BESS. Applicants identified the existing Byron Substation as having  
2 capacity to allow interconnection of new facilities and low interconnection costs,  
3 and as such could serve as the interconnection point for the Projects.  
4

5 The Applicants focused on open lands available near the point of interconnection  
6 to minimize gen-tie length. Project sites were potentially suitable if they were  
7 cleared and otherwise undeveloped, not currently encumbered by other  
8 easements (e.g., wind farms, pipelines), and contained minimal wetlands, streams,  
9 transmission lines, roads, or other obstacles. The Applicants also screened the  
10 areas for geotechnical risks, habitat for endangered species, proximity to culturally  
11 sensitive areas, other potential environmental risks, and current land use conflicts.  
12 Following this screening, the Applicants approached landowners to negotiate  
13 voluntary purchase option agreements and easements.  
14

15 The final Crane and Sandhill Land Control Areas were chosen based on proximity  
16 to and availability of interconnection at the Byron Substation, supportive  
17 landowners, and potential for the Projects to ease grid congestion.  
18

19 **Q. Did you coordinate with local landowners, local, state, and federal regulatory**  
20 **stakeholders, and tribes?**

21 A. Yes. Applicants conducted early and ongoing engagement with local landowners,  
22 federal, state, and local regulatory stakeholders, and Tribal Nations to introduce  
23 the Projects, request input, and coordinate permitting.  
24

25 At the federal level, Applicants have coordinated with the Army Corps of  
26 Engineers, the Federal Aviation Administration, and the Department of  
27 Agriculture–Natural Resource Conservation Service. Applicants also contacted the  
28 U.S. Fish and Wildlife Service but have received no response.  
29

30 State coordination included communications with: Department of Commerce–  
31 Energy Environmental Review and Analysis regarding the Joint Application and

1 considerations arising from the Projects' proximity to each other and overlapping  
2 facilities and land areas; the Department of Natural Resources regarding protected  
3 species, proposed BESS technologies, and a future Natural Heritage Review; the  
4 Board of Water and Soil Resources regarding Wetland Conservation Act  
5 compliance; the Department of Transportation confirming no impacts to state  
6 highways; and the Department of Agriculture regarding impacts to agricultural land,  
7 and Best Management Practices and restoration to facilitate reversion to  
8 agricultural use post-decommissioning.

9  
10 Local engagement included meetings and exchanges with Olmsted County  
11 officials and planning staff, City of Byron administration, the City of Byron Fire  
12 Chief, the Byron Chamber of Commerce, and the Byron Township Cooperative  
13 Planning Association.

14  
15 Applicants notified all eleven Tribal Nations recognized in Minnesota and received  
16 a response from the Shakopee Mdewakanton Sioux (Dakota) Community  
17 requesting the archaeological literature review/field inventory. Applicants provided  
18 the Shakopee Mdewakanton Sioux (Dakota) Community, via the Tribal Historic  
19 Preservation Officer, Leonard Wabasha, with a copy of the archaeological  
20 inventories on November 25, 2025. Mr. Wabasha responded to confirm receipt and  
21 requested that the Applicants keep the Shakopee Mdewakanton Sioux (Dakota)  
22 Community informed of the progress on the proposed Projects. (**Schedule B.**)

23  
24 **Q. Do you have any updates on coordination with local stakeholders?**

25 Yes. The Applicants have continued to engage with local stakeholders. At the  
26 request of the Byron Fire Department Chief, the Applicants have committed to  
27 funding the interconnection of two existing dead-end water lines through the  
28 project site to benefit the City of Byron and Kalmar Township. This commitment  
29 will be memorialized in a formal agreement with the City of Byron.

1 **IV. SANDHILL PROJECT UPDATES**

2 **Q. Have there been any updates to the Sandhill Project since the Application**  
3 **was filed?**

4 Yes. Following the filing of the Application, Northern States Power Company, doing  
5 business as Xcel Energy, nominated the Sandhill Project to the Commission for  
6 inclusion in the Midcontinent Independent System Operator’s (MISO) ERAS  
7 process (**Schedule C**). The Commission issued a RERRA Verification Form for  
8 Sandhill to confirm that the Sandhill Project should be considered for the ERAS  
9 process to meet a resource adequacy and/or reliability need. (**Schedule D**). The  
10 Sandhill Project is currently awaiting MISO approval to be admitted into the ERAS  
11 queue. (**Schedule E**).

12 **Q. Please describe MISO’s ERAS purpose and process.**

13 A. ERAS is a MISO pathway to fast-track interconnection for near-term resources  
14 needed for system reliability and capacity. The ERAS process is aimed at easing  
15 the multi-year backlog in the standard queue. ERAS provides a capped, first-come-  
16 first-served channel for up to 68 projects, with no more than ten per quarterly cycle.  
17 Projects undergo the same types of studies used in MISO’s Definitive Planning  
18 Process but on an accelerated timeline, with each quarterly study targeted to finish  
19 in about 60 days, and the overall timeline from the time that the ERAS application  
20 is selected to a Generation Interconnection Agreement (GIA) of roughly three  
21 months. Participation requires verification from the RERRA—here, the Minnesota  
22 Public Utilities Commission—to confirm, among other things, that the new,  
23 incremental load addition claimed by the Interconnection Customer, such as  
24 Sandhill, is valid and not otherwise included in a resource plan or other process in  
25 the RERRA’s purview; or that the Generating Facility proposed by the  
26 interconnection customer will address a resource adequacy deficiency as  
27 determined by the RERRA, State, Load Serving Entity (e.g. a utility), or  
28 interconnection customer.

1 **Q. Proceeding under the ERAS process, when is the earliest that Sandhill**  
2 **anticipates it will execute a GIA?**

3 A. The Sandhill Project was not selected by MISO during the first ERAS cycle (ERAS  
4 Q3), so the earliest Sandhill could be selected is the next cycle, beginning on  
5 December 1, 2025 (ERAS Q4). Based on the timelines set forth in the process, if  
6 the Sandhill Project is selected into ERAS the earliest that a GIA could be reached  
7 for the Sandhill Project is mid-February 2026.<sup>1</sup> If the Sandhill Project is not selected  
8 for ERAS, the earliest a GIA could be reached is August 2026. As stated in the  
9 Application, after Commission approval is received, construction may begin as  
10 early as the third quarter of 2027 with a commercial operation date of fourth quarter  
11 of 2028. Construction of the Sandhill Project is expected to commence after  
12 construction of the Crane Project is initiated, with timing for each dependent on the  
13 offtake arrangements for each Project.

14

## 15 **V. CRANE PROJECT UPDATES**

16 **Q. Have there been any updates to the Crane Project since the Application was**  
17 **filed?**

18 Yes. Following the filing of the Application, Crane entered into an agreement with  
19 an off-taker for the sale of power and services to be provided by the Crane Project.  
20 Crane is unable to name the off-taker at this time due to confidentiality  
21 requirements, but will provide the name of the off-taker prior to commencing  
22 construction of the Crane Project.

23 **Q. Do you have any updates to the Project Schedule?**

24 A. As noted in the Application, Crane anticipates receiving Commission approval for  
25 the Crane Project and also entering into a GIA with MISO in the first quarter of  
26 2026. After Commission approval is received, construction is anticipated to begin

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<sup>1</sup> See eDockets No. [20259-222947-01](#) at 2-3.

1 in first quarter of 2027 with an anticipated commercial operation date of second  
2 quarter of 2028.

3 **Q. What is the expected timeline for negotiating and obtaining a GIA for the**  
4 **Crane Project?**

5 A. Crane filed a GIA application with MISO in 2021 for 200 MW. A GIA with MISO is  
6 required to connect the Crane Project to the electrical transmission system. Crane  
7 expects to sign a GIA in the first quarter of 2026.

## 8 9 VI. SITE PLAN UPDATES

10 **Q. The Application notes that an on-site wetland delineation has been**  
11 **completed evaluating the presence and nature of wetlands within the**  
12 **Projects' Land Control Areas and Preliminary Development Areas. Have**  
13 **there been any subsequent revisions to this delineation? If so, please**  
14 **describe those revisions.**

15 A. Yes. As noted in the Application, a wetland and waterway delineation was  
16 conducted from July 20 to July 23, 2024, to identify and characterize wetlands and  
17 waterways per United States Army Corps of Engineers methodology. The 2024  
18 delineation identified seven total wetlands comprising 4.5 acres. The 2024  
19 delineation identified no wetlands intersecting with the Crane Project Land Control  
20 or Preliminary Development Areas. The delineation did note that the northeast  
21 boundary of the Sandhill Land Control Area intersects one wetland by 5 feet but  
22 further concluded that the Sandhill Preliminary Development Area is located  
23 approximately 25 feet south of the wetland.

24  
25 On September 11, 2025, the Technical Evaluation Panel (TEP), under the Wetland  
26 Conservation Act, visited the site for the Crane and Sandhill Projects for a Wetland  
27 Type Confirmation, Delineation Concurrence, and No-Loss Decision. The TEP  
28 determined that certain revisions to the wetland delineation were needed before  
29 the NOD could be issued. The TEP concluded that three previously identified  
30 wetland areas were, in fact, not wetlands, and recommended that the extent of one  
31 wetland be reduced from 0.969 acres to 0.006 acres. The revisions reduced total

1 wetlands within the Land Control Areas from 4.463 to 3.229 acres. The revisions  
2 also eliminated a previously identified ephemeral stream identified by the prior  
3 delineation.

4  
5 **Q. Has a NOD for boundary concurrence been issued for the delineation of**  
6 **wetlands within the Project Areas?**

7 A. Yes. Applicants received the NOD on October 21, 2025 (**Schedule F**). Based on  
8 the TEP's evaluation on September 11, 2025, and following Applicants'  
9 incorporation of the TEP's suggested revisions, the NOD concludes that "[b]ased  
10 on the footprint of the future BESS project as provided, the project as designed will  
11 result in no impact to wetland and qualifies as a No Loss under WCA  
12 8420.0415.subp. A – No wetland will be impacted during this project."

13  
14 **VII. COORDINATION WITH SHPO**

15 **Q. The Commission authorized Applicants to initiate consultation with SHPO**  
16 **related to the Projects and directed the Applicants to inform the Commission**  
17 **of the status of that consultation with pre-filed testimony. Are you aware of**  
18 **that authorization?**

19 A. Yes, in this section of my Direct Testimony, I will provide an update regarding  
20 Applicants' coordination with SHPO regarding the projects.

21  
22 **Q. Has a cultural resources literature review or Phase I archaeological**  
23 **reconnaissance survey been performed or conducted for the Projects?**

24 A. Yes. Applicants engaged TRC Companies, Inc. (TRC) to perform both a cultural  
25 resource literature review and field-based Phase I archaeological reconnaissance  
26 survey for the Projects. Applicants provided both the literature review and field  
27 survey results to the SHPO for review.

1 **Q. What were the results of the cultural resources literature review and Phase I**  
2 **archaeological reconnaissance field survey?**

3 A. The cultural resources literature review and Phase I field survey did not identify  
4 any National Register of Historic Places (NRHP) properties, archaeological sites,  
5 cemeteries, or historic structures within the Project Areas. Based on these results,  
6 neither the Crane Project nor the Sandhill Project will affect historic properties  
7 eligible for or listed in the NRHP.

8  
9 **Q. Please describe the Applicants' pre-application coordination with SHPO**  
10 **regarding the Projects.**

11 A. Applicants provided the SHPO with both the literature review and Phase I field  
12 inventory results on September 5, 2024, and December 19, 2024, respectively. On  
13 February 3, 2025, SHPO responded and agreed with the findings and  
14 recommendations in the Phase I field inventory report and commented that the  
15 Crane and Sandhill Projects would not affect properties listed in the National or  
16 State Registers of Historic Places or within the Historic Sites Network. SHPO's  
17 February 3 confirmation was submitted with the Application.<sup>2</sup>

18  
19 **VIII. COMMENTS ON THE EA AND DRAFT SITE PERMIT**

20 **Q. Have you reviewed the EA and DSPs prepared by the Commission Energy**  
21 **Infrastructure Permitting unit for the Projects?**

22 A. Yes.  
23

24 **Q. Do you have any comments on the DSPs?**

25 A. Yes. I have comments on the fence height conditions. I understand that the DSPs  
26 have a condition that would require security fencing that minimizes visual impact  
27 of the projects while maintaining compliance with the National Electric Safety  
28 Code. The condition also requires that a final fence plan for the site be developed

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<sup>2</sup> eDockets No. [20253-216062-05](#) at 3 (Joint Application, Appendix B).

1 in consultation with the Minnesota Department of Natural Resources (MDNR). I  
2 understand that MDNR generally recommends a 10-foot fence height for BESS  
3 projects in Minnesota. I have confirmed that a 10-foot fence height will comply with  
4 the National Electric Safety Code requirements, and the Applicants will  
5 accommodate MDNR's preference for a 10-foot fence height. The Applicants will  
6 also continue to develop a site plan that can minimize visual impacts.

7  
8 **IX. LOCAL EMPLOYMENT & ECONOMIC BENEFITS**

9 **Q. Will the Projects result in local employment and economic benefits?**

10 A. Yes. The Projects will result in direct monetary benefits to landowners involved in  
11 the Projects through payments for voluntary purchase or easement agreements  
12 between the landowners and Crane and Sandhill. Construction of the Projects will  
13 result in temporary increases to revenue of the area through increased demand  
14 for lodging, food services, fuel, transportation, and general supplies.

15  
16 Applicants will create job opportunities for trade professionals that live and work in  
17 the area. Applicants will solicit bids from Engineering, Procurement, and  
18 Construction (EPC) contractors and will prioritize EPC contractor bids that utilize  
19 local, union construction personnel to the greatest extent feasible. Construction of  
20 the Projects will require 75 construction personnel, while operations and  
21 management of the Facility will require four long-term personnel.

22  
23 Since filing the Application, Applicants have conducted additional analysis and  
24 determined that as a result of sales and use taxes stemming from the purchase of  
25 equipment and construction materials, the Projects are estimated to generate \$17  
26 million (\$34 million for both Projects) for the State of Minnesota and \$1.3 million  
27 for Olmsted County (\$2.6 million for both Projects).

28  
29 **X. CONCLUSION**

30 **Q. Does this conclude your Direct Testimony?**

31 A. Yes.



**James Hingston**  
Director of Development

### Education

Bachelor of Business Administration (Finance), 2013  
University of Massachusetts, Amherst, MA

### Current Role

Director of Development, US Solar & Storage Holdings  
May 2025 - Present

- Lead development of utility-scale Battery Energy Storage (BESS) and solar projects from site control through handoff to construction.
- Direct discretionary permitting and entitlements with counties, municipalities, and state PUCs; coordinate closely with planning staff, AHJs, and fire authorities.
- Support interconnection and commercial offtake strategy; coordinate with engineering, legal, and finance to maintain critical path.
- Manage environmental due diligence efforts to ensure projects minimize impacts to sensitive wetlands, biological, or cultural areas.
- Build and maintain relationships with landowners, local officials, first responders, and community stakeholders.
- Structure community benefit frameworks (e.g., Joint Development/Host agreements) that address local priorities and emergency response needs.
- Manage project budgets and schedules to advance projects efficiently and transparently.

### Additional Work Experience

- US Solar & Storage Holdings  
Development Manager  
May 2022 – May 2025
- Community Preservation Partners  
Project Manager  
February 2017 – May 2022

**From:** [Leonard Wabasha \(TO\)](#)  
**To:** [Monika Davis](#)  
**Subject:** EXTERNAL: RE: Crane & Sandhill BESS Projects - Follow-up on Project Notification Response  
**Date:** Tuesday, November 25, 2025 3:12:44 PM  
**Attachments:** [image003.png](#)  
[image004.png](#)  
[image005.png](#)

**CAUTION:** This email originated from outside of Merjent.

Thank you for the opportunity to consult, please keep us informed of the progress of this proposed project, Have a Great Day!!



**LEONARD WABASHA**  
Tribal Historic Preservation Officer • Hocokata Ti  
Shakopee Mdewakanton Sioux Community  
d: 952.496.6120  
[shakopeedakota.org](http://shakopeedakota.org)  
[Leonard.Wabasha@shakopeedakota.org](mailto:Leonard.Wabasha@shakopeedakota.org)

The Shakopee Mdewakanton Sioux Community is a federally recognized, sovereign Indian tribe located southwest of Minneapolis/St. Paul. With a focus on being a good neighbor, good steward of the earth, and good employer, the SMSC is committed to charitable donations, community partnerships, a healthy environment, and a strong economy.

**From:** Monika Davis <[monika.davis@merjent.com](mailto:monika.davis@merjent.com)>  
**Sent:** Tuesday, November 25, 2025 1:22 PM  
**To:** Leonard Wabasha (TO) <[leonard.wabasha@shakopeedakota.org](mailto:leonard.wabasha@shakopeedakota.org)>  
**Cc:** Jan Porvaznik <[japv@cip-tt.com](mailto:japv@cip-tt.com)>; James Hingston <[jhingston@ussolarandstorage.com](mailto:jhingston@ussolarandstorage.com)>  
**Subject:** Crane & Sandhill BESS Projects - Follow-up on Project Notification Response

You don't often get email from [monika.davis@merjent.com](mailto:monika.davis@merjent.com). [Learn why this is important](#)

This message came from **outside the organization**. Do Not click on links, open attachments or respond unless you know the content is safe.

Good afternoon, Mr. Wabasha.

Thank you for your response to the project introduction letter for the Crane and Sandhill Battery Energy Storage Systems Projects (MPUC Docket Nos. IP-7148/ESS-24-406 and IP-7149/ESS-24-407) and for your request to receive a copy of the archaeological literature review/study. Copies of the archaeological inventories are available at the following link: [Crane & Sandhill BESS CR Reports for SMDC](#). I am also sending you an email invitation to the site, in the event the link in this email does not work. If you have any trouble accessing the file sharing site, please let me know and I will troubleshoot. Hardcopies of the studies are available upon request.

Should you have any questions about the projects, please don't hesitate to reach out project representatives Jan Porvaznik at [japv@cip-tt.com](mailto:japv@cip-tt.com) or James Hingston at [jhingston@ussolarandstorage.com](mailto:jhingston@ussolarandstorage.com).

Have a great rest of your day!

**Monika H. Davis** (she/her)  
**Power Sector Lead**

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414 Nicollet Mall  
Minneapolis, MN 55401

August 1, 2025

Mike Bull  
Acting Executive Secretary  
Minnesota Public Utilities Commission  
121 7<sup>th</sup> Place East, Suite 350  
St. Paul, MN 55101

—Via Electronic Filing—

RE: PROPOSED GENERATOR PROJECTS FOR EXPEDITED RESOURCE ADDITION  
STUDY (ERAS) - SUPPLEMENT  
DOCKET NO. E002/RP-24-67

Dear Mr. Bull:

This letter supplements our letter filed earlier today with two additional projects, as indicated in [blue](#) below.

Northern States Power Company, doing business as Xcel Energy, respectfully requests the Minnesota Public Utilities Commission, as the Relevant Electric Retail Regulatory Authority (RERRA), to provide verification to the Midcontinent Independent System Operator (MISO) in support of an Expedited Resource Addition Study (ERAS) for the following additional projects:

- 300 MW Nobles Energy Storage,
- 200 MW Sandhill Energy Storage,
- 300 MW Little Rock Wind/Storage,
- 100 MW Benton II Solar plus 300 MW Benton Energy Storage,
- [200 MW Redwood Energy Storage, and](#)
- [150 MW Lake Charlotte Energy Storage.](#)

Our July 22, 2025 letter to the Commission requested verification of incremental capacity at the Cannon Falls Energy Center and the new Sherco South Energy Storage

project. It also included a proposal to potentially submit additional renewable projects for Commission verification.<sup>1</sup>

At the Commission’s Special Meeting on July 24, 2025, the Commission voted to accept our proposed projects for RERRA verification, delegated to the Executive Secretary the responsibility to complete the MISO Verification Forms and coordinate with utilities and MISO as necessary for submission, and allowed the Company to potentially identify additional projects for verification and inclusion in the first MISO ERAS submission window. We thank the Commission for its prompt and collaborative attention to this matter.

While we originally believed we would have 2-3 renewable projects of up to 600 MW to additionally submit for verification, we were able to identify more projects. In addition to being consistent with the needs approved by the Commission in our 2024-2040 Upper Midwest Integrated Resource Plan (2024 IRP), this set of projects is consistent with the discussion at the Special Meeting, where the Commission encouraged utilities to bring forward any project consistent with approved resource plans that meet the ERAS eligibility criteria.

To that end, we have worked with several developers to identify potential additional resources that meet the ERAS criteria and support the Company’s approved resource needs. We discuss these projects below, including how each aligns with the Five-Year Action Plan in our approved 2024 IRP.

In making this request for RERRA verification, we are balancing speed with other considerations in order to preserve project eligibility – meaning, we will be continuing our due diligence on this additional set of projects up to their potential submission in the MISO ERAS process. For this reason, these projects carry greater uncertainty. That said, these projects align with our approved needs and, at this time, we believe these projects meet all of the MISO ERAS criteria. The Company is committed to keeping the Commission informed regarding which projects are ultimately submitted through the ERAS process.

**A. Project Descriptions – Requested Additional RERRA Verification**

*1. Nobles Energy Storage*

The 300 MW/1,200 MWh Nobles Energy Storage project is being developed

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<sup>1</sup> The Company’s July 22, 2025 letter proposed the Company would submit any additional projects by July 31, 2025. In order to provide the best-informed projects as possible, given the tight timeframe of the MISO ERAS process, the Company consulted with Commission staff, who allowed the Company until noon August 1, 2025 to submit its additional projects for verification.

by Xcel Energy on approximately 25 acres of existing Company-owned property at the Nobles Wind Farm in Nobles County, Minnesota. The Company has full site control, and the Commercial Operation Date (COD) is targeted for 2028. This project also aligns with the Commission’s March 24, 2025 Order in Docket No. E-999/CI-24-316 (Transmission Curtailment Order), which emphasizes battery energy storage as a promising solution to alleviate transmission congestion in the Nobles County Substation area. As noted in the Order, battery storage can help shift excess wind generation to periods of lower output, potentially reducing curtailments and improving grid reliability. The Nobles Energy Storage project may play a role in addressing short-term transmission limitations identified in the Commission’s investigation.

### 2. *Sandhill Energy Storage*

The 200 MW/800 MWh Crane Energy Storage project, currently under development by an independent bidder, was bid into our 2024 Wind, Solar, Storage RFP.<sup>2</sup> The proposed Sandhill Energy Storage project represents a 200 MW/800 MWh expansion of the Crane project. Both projects are located together in Olmstead County, Minnesota. The developer has 100 percent site control, with a targeted COD of 2028.

### 3. *Little Rock Wind/Storage*

The 300 MW Little Rock Wind/Storage project is being developed by Xcel Energy in conjunction with an independent developer and is part of the Minnesota Energy Connection (MNEC) Wind Development Transfer RFP.<sup>3</sup> The project is located south of the MNEC endpoint substation near Garvin, Minnesota so leveraging the ERAS process offers a more efficient interconnection path. The project has 100 percent land control with a targeted COD of 2028.

### 4. *Benton Solar II and Benton Energy Storage II*

The 100 MW Benton Solar project, currently under development by an independent bidder, was bid into our 2024 Wind, Solar, Storage RFP.<sup>4</sup> The proposed Benton Solar II and Benton Energy Storage II projects represent an additional 100 MW of solar capacity and 300 MW/1,200 MWh of storage that will supplement the original project. All projects are located together in Benton County, Minnesota. The developer has 100 percent site control, with a targeted COD of 2028.

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<sup>2</sup> Docket No. E002/M-24-230.

<sup>3</sup> Docket No. E002/M-23-342

<sup>4</sup> Docket No. E002/M-24-230.

### 5. Redwood Energy Storage

The 200 MW/800 MWh Redwood Energy Storage Project is currently under development by a third party. The project is located in Redwood County, Minnesota with planned interconnection via a line-tap of the Cedar Mountain to Lyon County 345kv line. The developer has 100 percent site control with a targeted COD of 2028.

### 6. Lake Charlotte Energy Storage

The 150 MW/600 MWh Lake Charlotte Energy Storage project is currently under development by a third party. The project is located in Martin County, Minnesota with planned interconnection at the Rutland 161kv substation. The developer has 100 percent site control with a targeted COD of 2028.

## B. Proposed ERAS Project Helps Achieve the Approved Five-Year Action Plan

As discussed in our July 22, 2025 letter, the Company's approved 2024 IRP includes a Five-Year Action Plan that identifies the need for:

- 3,200 MW of wind,
- 400 MW of solar, and
- 600 MW of standalone storage

To meet these near-term system needs, the Company is currently conducting two acquisition processes:

- 1) Wind Development Transfer Request for Proposals (RFP) – seeking 1,200 MW of wind resources.
- 2) 2024 NSP RFP – seeking up to 1,600 MW of wind, solar, storage, or hybrid resources.

The Five-Year Action Plan, RFP targets, and remaining needs are shown in Table 1 below.

**Table 1: Approved IRP – Five-Year Action Plan**

	Approved Five-Year Action Plan (MWs)	Targeted MWs in RFPs <sup>5</sup>	Remaining Need
Standalone Storage	600	400	200
Wind	3,200	2,400	800
Solar	400		400

<sup>5</sup> The 1,600 MW 2024 RFP target is shown in Table 1 as 400 MW Storage and 1,200 MW Wind. The 2024 RFP was open to Wind, Solar, Storage and Hybrid resources to meet the target.

	Approved Five-Year Action Plan (MWs)	Targeted MWs in RFPs <sup>5</sup>	Remaining Need
<b>Firm Peaking</b>	Approved Firm Dispatchable Bids including Cannon Falls <sup>6</sup>		
<b>Total</b>	4,200	2,800	1,400

As shown in Table 1, the Five-Year Action Plan identifies the need for 4,200 MWs of capacity. While shortlisted resources are currently in negotiation in our ongoing RFPs to fill the targeted 2,800 MW of capacity, it is important to note that even if all resources sought through these RFPs are successfully acquired, the total would still fall short of the capacity identified in the approved Five-Year Action Plan.

The proposed Nobles Energy Storage, Sandhill Energy Storage, Little Rock Wind, Benton Solar II and Benton Energy Storage II, [Redwood Energy Storage](#), and [Charlotte Energy Storage](#) projects align with the Company's ongoing resource acquisition efforts and are integral to achieving the capacity targets identified in the Five-Year Action Plan. These projects support compliance with Commission-approved planning objectives and reinforce the Company's commitment to maintaining a reliable and balanced resource portfolio.

### C. Conclusion

Given the limited window and first-come, first-serve nature of ERAS applications beginning on August 6, 2025, we respectfully request that the Executive Secretary, as designated by the Commission and acting in its capacity as the Relevant Electric Retail Rate Authority (RERRA), provide the required MISO verification forms confirming that the Nobles Energy Storage, Sandhill Energy Storage, Little Rock Wind, Benton Solar and Benton Energy Storage, [Redwood Energy Storage](#), and [Lake Charlotte](#) projects are consistent with our approved 2024 IRP. To support a timely submission on the opening day of the application window, we respectfully request that the verifications for these projects be issued no later than August 4, 2025. To that end, we provide with this letter, a partially completed MISO RERRA Verification Form, along with the IRP Order and the Transmission Curtailment Order, as applicable, for each of the projects.

Recognizing the accelerated timeline and competitive nature of the ERAS process, we will continue our diligence efforts to confirm project eligibility. The Company will update the Commission regarding which projects are ultimately submitted through the ERAS process.

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<sup>6</sup> The approved bids are: Lyon County Generating Station, Sherco Storage, Mankato Energy Center, Cannon Falls Energy Center, DESRI North Star Energy Storage, Lake Wilson Solar plus Storage, and Plum Creek Wind plus Storage. Plum Creek subsequently withdrew its proposal.

To the extent the entirety of the ERAS queue is not exhausted in the first submission window, we will continue to work diligently to identify additional projects for the Commission to consider for future quarterly ERAS submission windows.<sup>7</sup> We appreciate the Commission's support, and acknowledge the importance of allowing sufficient time for review by the Commission. The Company remains committed to providing all necessary documentation promptly to facilitate a comprehensive and efficient evaluation process.

We have electronically filed this document with the Minnesota Public Utilities Commission. Copies have been served on parties on the attached service list. Please contact Jody Londo at [jody.l.londo@xcelenergy.com](mailto:jody.l.londo@xcelenergy.com) or me at [bria.e.shea@xcelenergy.com](mailto:bria.e.shea@xcelenergy.com) if you have any questions regarding this filing.

Sincerely,

*/s/ Bria E. Shea*

BRIA E. SHEA  
REGIONAL VICE PRESIDENT, REGULATORY POLICY

Enclosures  
c: Service List

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<sup>7</sup> Applications for each quarter are due no later than 15 business days prior to study kickoff for the quarter. The first quarterly study will kick off on September 2, 2025; therefore, applications for the first quarterly study period must be received by August 11, 2025. ERAS will sunset on earlier of completion of the 68<sup>th</sup> Interconnection Request ERAS study or on August 21, 2027.

**CERTIFICATE OF SERVICE**

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

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

or

xx electronic filing

**Docket No. E002/RP-24-67**

Dated this 1st day of August 2025

/s/

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Joshua DePauw  
Regulatory Administrator

## Schedule C

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
1	Steve	Albrecht	steve.albrecht@shakopeedakota.org	Shakopee Mdewakanton Sioux Community		Shakopee Mdewakanton Sioux Community 2330 Sioux Trail NW Prior Lake MN, 55372 United States	Electronic Service		No	24-67
2	Jared	Alholinna	jaholinna@greenergy.com	Great River Energy		12300 Elm Creek Boulevard Maple Grove MN, 55369 United States	Electronic Service		No	24-67
3	Keith	Anderson	keith.anderson@shakopeedakota.org	Shakopee Mdewakanton Sioux Community		Shakopee Mdewakanton Sioux Community 2330 Sioux Trail NW Prior Lake MN, 55372 United States	Electronic Service		No	24-67
4	Shannon	Anderson	sanderson@solarunitedneighbors.org	Solar United Neighbors			Electronic Service		No	24-67
5	Beren	Argetsinger	bargetsinger@keyesfox.com			PO BOX 166 Burdett NY, 14818 United States	Electronic Service		No	24-67
6	Ray	Auginaush, Sr.	ray.auginaush@whiteearth-nsn.gov	White Earth Nation		White Earth Tribal Headquarters 35500 Eagle View Road Ogema MN, 56569 United States	Electronic Service		No	24-67
7	Mark	Bakk	mbakk@lcp.coop	Lake Country Power		26039 Bear Ridge Drive Cohasset MN, 55721 United States	Electronic Service		No	24-67
8	Daniel	Becchetti	dbecchetti@greenergy.com	Great River Energy		12300 Elm Creek Boulevard Maple Grove MN, 55369 United States	Electronic Service		No	24-67
9	Todd	Beck	tbeck@greenergy.com			null null, null United States	Electronic Service		No	24-67
10	Amadeo	Bellino	amadeo.bellino@whiteearth-nsn.gov	White Earth Nation		White Earth Tribal Headquarters 35500 Eagle View Road Ogema MN, 56569 United States	Electronic Service		No	24-67
11	Melanie	Benjamin	melanie.benjamin@millelacsband.com			43408 Oodena Drive Onamia MN, 56359 United States	Electronic Service		No	24-67
12	Laura	Bishop	laura.bishop@state.mn.us		Minnesota Pollution Control Agency	520 Lafayette Rd Saint Paul MN, 55155 United States	Electronic Service		No	24-67
13	Ingrid	Bjorklund	ingrid@bjorklundlaw.com	Bjorklund Law, PLLC		855 Village Center Drive #256 North Oaks MN, 55127 United States	Electronic Service		No	24-67

## Schedule C

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
14	Hunter	Boldt	hunterboldt@redlakenation.org	Red Lake Nation		15484 Migizi Drive Red Lake MN, 56671 United States	Electronic Service		No	24-67
15	Peter	Boney	pboney@boisforte-nsn.gov	Bois Forte Band of Chippewa		Bois Forte Tribal Government 5344 Lakeshore Drive Nett Lake MN, 55772 United States	Electronic Service		No	24-67
16	Sheldon	Boyd	sheldon.boyd@millelacsband.com	Mille Lacs Band of Ojibwe		43408 Oodena Drive Onamia MN, 56359 United States	Electronic Service		No	24-67
17	Jon	Brekke	jbrekke@greenergy.com	Great River Energy		12300 Elm Creek Boulevard Maple Grove MN, 55369-4718 United States	Electronic Service		No	24-67
18	Matthew	Brodin	mbrodin@allete.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	24-67
19	B. Andrew	Brown	brown.andrew@dorsey.com	Dorsey & Whitney LLP		Suite 1500 50 South Sixth Street Minneapolis MN, 55402-1498 United States	Electronic Service		No	24-67
20	Marvin Ray	Bruneau	marvin.bruneau@millelacsband.com	Mille Lacs Band of Ojibwe		43408 Oodena Drive Onamia MN, 56359 United States	Electronic Service		No	24-67
21	Christina	Brusven	cbrusven@fredlaw.com	Fredrikson Byron		60 S 6th St Ste 1500 Minneapolis MN, 55402-4400 United States	Electronic Service		No	24-67
22	Scott	Buchanan	scottbuchanan@fdlrez.com	Fond du Lac Band of Lake Superior Chippewa		1720 Big Lake Road Cloquet MN, 55720 United States	Electronic Service		No	24-67
23	Shelley	Buck	shelley.buck@piic.org	Prairie Island Indian Community		Prairie Island Indian Community 5636 Sturgeon Lake Road Welch MN, 55089 United States	Electronic Service		No	24-67
24	Robert	Budreau	robert.budreau@llojibwe.net	Leech Lake Band of Ojibwe		190 Sailstar Drive NW Cass Lake MN, 56633 United States	Electronic Service		No	24-67
25	Mike	Bull	mike.bull@state.mn.us		Public Utilities Commission	121 7th Place East, Suite 350 St. Paul MN, 55101 United States	Electronic Service		Yes	24-67

## Schedule C

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

## Schedule C

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						United States				
39	Ian M.	Dobson	ian.m.dobson@xcelenergy.com	Xcel Energy		414 Nicollet Mall, 401-8 Minneapolis MN, 55401 United States	Electronic Service		No	24-67
40	Shane	Drift	sdrift@boisforte-nsn.gov	Bois Forte Band of Chippewa		Bois Forte Tribal Government 5344 Lakeshore Drive Nett Lake MN, 55772 United States	Electronic Service		No	24-67
41	Christopher	Droske	christopher.droske@minneapolismn.gov	Northern States Power Company dba Xcel Energy-Elec		661 5th Ave N Minneapolis MN, 55405 United States	Electronic Service		No	24-67
42	Adam	Duininck	aduininck@ncsrcc.org	North Central States Regional Council of Carpenters		700 Olive Street St. Paul MN, 55130 United States	Electronic Service		No	24-67
43	Wally	Dupuis	wallydupuis@fdlband.org	Fond du Lac Band of Lake Superior Chippewa		1720 Big Lake Road Cloquet MN, 55720 United States	Electronic Service		No	24-67
44	Kevin	Dupuis, Sr.	kevindupuis@fdlrez.com			Reservation Business Committee 1720 Big Lake Rd Cloquet MN, 55720 United States	Electronic Service		No	24-67
45	Jamie	Edwards	jamie.edwards@millelacsband.com	Mille Lacs Band of Ojibwe		43408 Oodena Drive Onamia MN, 56358 United States	Electronic Service		No	24-67
46	Michael	Fairbanks	michael.fairbanks@whiteearth-nsn.gov	White Earth Reservation Business Committee		PO Box 418 White Earth MN, 56591 United States	Electronic Service		No	24-67
47	John	Farrell	jfarrell@ilsr.org	Institute for Local Self-Reliance		2720 E. 22nd St Institute for Local Self-Reliance Minneapolis MN, 55406 United States	Electronic Service		No	24-67
48	Sharon	Ferguson	sharon.ferguson@state.mn.us		Department of Commerce	85 7th Place E Ste 280 Saint Paul MN, 55101-2198 United States	Electronic Service		No	24-67
49	Terri	Finn	terri.goggeye@llojibwe.net			null null, null United States	Electronic Service		No	24-67
50	Christine	Fox	cfox@itasca-mantrap.com	Itasca-Mantrap Coop. Electric Assn.		PO Box 192 Park Rapids MN, 56470 United States	Electronic Service		No	24-67
51	Lucas	Franco	lfranco@liunagroc.com	LIUNA		81 Little Canada Rd E Little Canada MN, 55117 United States	Electronic Service		No	24-67
52	Gary	Frazer	gfrazer@mnchippewatribe.org	Minnesota Chippewa		PO Box 217 Cass Lake	Electronic Service		No	24-67

## Schedule C

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53	Stacey	Fujii	sfujii@grenergy.com	Great River Energy		12300 Elm Creek Boulevard Maple Grove MN, 55369-4718 United States	Electronic Service		No	24-67
54	Edward	Garvey	garveyed@aol.com	Residence		32 Lawton St Saint Paul MN, 55102 United States	Electronic Service		No	24-67
55	Shannon	Geshick	shannon.geshick@state.mn.us	Minnesota Indian Affairs Council (MIAC)		null null, null United States	Electronic Service		No	24-67
56	Allen	Gleckner	gleckner@fresh-energy.org	Fresh Energy		408 St. Peter Street Ste 350 Saint Paul MN, 55102 United States	Electronic Service		No	24-67
57	Jeffrey	Haase	jhaase@grenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	24-67
58	Hal	Halpern	halhalpern@clpower.com	Cooperative Light & Power		1554 Hwy 2 PO Box 69 Two Harbors MN, 55616 United States	Electronic Service		No	24-67
59	Jeremy	Hamilton	jhamilton@uppersiouxcommunity-nsn.gov	Upper Sioux Community		Upper Sioux Community PO Box 147 Granite Falls MN, 56241 United States	Electronic Service		No	24-67
60	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	24-67
61	Amy	Hastings	amyh@uppersiouxcommunity-nsn.gov	Upper Sioux Community		5722 Travers Lane PO Box 147 Granite Falls MN, 56241 United States	Electronic Service		No	24-67
62	Erik	Hatlestad	erik@cureliver.org			117 1st St Montevideo MN, 56265 United States	Electronic Service		No	24-67
63	Adam	Heinen	aheinen@dakotaelectric.com	Dakota Electric Association		4300 220th St W Farmington MN, 55024 United States	Electronic Service		No	24-67
64	Kristin	Henry	kristin.henry@sierraclub.org	Sierra Club		2101 Webster St Ste 1300 Oakland CA, 94612 United States	Electronic Service		No	24-67
65	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	24-67
66	Ronald	Horman	rhorman@redwoodelectric.com	Redwood Electric Cooperative		60 Pine Street Clements	Electronic Service		No	24-67

## Schedule C

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67	Robbie	Howe	robbie.howe@llojibwe.net	Leech Lake Band of Ojibwe		190 Sailstar Drive NW Cass Lake MN, 56633 United States	Electronic Service		No	24-67
68	John	lhle	ljihle@rrt.net	PlainStates Energy LLC		27451 S Hwy 34 Barnesville MN, 56514 United States	Electronic Service		No	24-67
69	Annie	Jackson	cheryl.jackson@whiteearth-nsn.gov	White Earth Nation		White Earth Tribal Headquarters 35500 Eagle View Road Ogemo MN, 56569 United States	Electronic Service		No	24-67
70	Faron	Jackson, Sr.	faron.jackson@llojibwe.net			190 Sailstar Drive NW Cass Lake MN, 56633 United States	Electronic Service		No	24-67
71	Justin	Jahnz	justin.jahnz@ecemn.com	East Central Energy		412 Main Ave N Braham MN, 55006 United States	Electronic Service		No	24-67
72	Alan	Jenkins	aj@jenkinsatlaw.com	Jenkins at Law		2950 Yellowtail Ave. Marathon FL, 33050 United States	Electronic Service		No	24-67
73	Kevin	Jensvold	kevinj@uppersiouxcommunity-nsn.gov	Upper Sioux Community		PO Box 147 Granite Falls MN, 56241-0147 United States	Electronic Service		No	24-67
74	Annette	Johnson	annette.johnson@redlakenation.org	Red Lake Nation		15484 Migizi Drive Red Lake MN, 56671 United States	Electronic Service		No	24-67
75	Jody	Johnson	jody.johnson@piic.org	Prairie Island Indian Community		5636 Sturgeon Lake Rd Welch MN, 55089 United States	Electronic Service		No	24-67
76	Johnny	Johnson	johnny.johnson@piic.org	Prairie Island Indian Community		5636 Sturgeon Lake Road Welch MN, 55089 United States	Electronic Service		No	24-67
77	Richard	Johnson	rick.johnson@lawmoss.com	Moss & Barnett		150 S. 5th Street Suite 1200 Minneapolis MN, 55402 United States	Electronic Service		No	24-67
78	Sarah	Johnson Phillips	sPhillips@stoel.com	Stoel Rives LLP		33 South Sixth Street Suite 4200 Minneapolis MN, 55402 United States	Electronic Service		No	24-67
79	Mark	Kaminski	mark.kaminski@gsa.gov	General Services Administration		1800 F Street NW Washington DC, 20405 United States	Electronic Service		No	24-67

## Schedule C

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

## Schedule C

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						Maple Grove MN, 55369 United States				
94	Kavita	Maini	kmaini@wi.rr.com	KM Energy Consulting, LLC		961 N Lost Woods Rd Oconomowoc WI, 53066 United States	Electronic Service		No	24-67
95	Shena	Matrious	shena.matrious@millelacsband.com	Mille Lacs Band of Ojibwe		43408 Oodena Drive Onamia MN, 56349 United States	Electronic Service		No	24-67
96	April	McCormick	aprilm@grandportage.com	Grand Portage Band of Lake Superior Chippewa		PO Box 428 Grand Portage MN, 55605 United States	Electronic Service		No	24-67
97	Ronald	Meier	rmeier@mcleodcoop.com	Mcleod Cooperative Power		3515 11th St East Glencoe MN, 55336 United States	Electronic Service		No	24-67
98	Peder	Mewis	pmewis@cleangridalliance.org	Clean Grid Alliance		570 Asbury St. St. Paul MN, 55104 United States	Electronic Service		No	24-67
99	Valentina	Mgeni	valentina.mgeni@piic.org	Prairie Island Indian Community		Prairie Island Indian Community 5636 Sturgeon Lake Road Welch MN, 55089 United States	Electronic Service		No	24-67
100	Cole W.	Miller	cole.miller@shakopeedakota.org	Shakopee Mdewakanton Sioux Community		Shakopee Mdewakanton Sioux Community 2330 Sioux Trail NW Prior Lake MN, 55372 United States	Electronic Service		No	24-67
101	Stacy	Miller	stacy.miller@minneapolismn.gov	City of Minneapolis		350 S. 5th Street Room M 301 Minneapolis MN, 55415 United States	Electronic Service		No	24-67
102	David	Moeller	dmoeller@allete.com	Minnesota Power			Electronic Service		No	24-67
103	Sarah	Mooradian	sarah@curemn.org	CURE		117 South 1st Street Montevideo MN, 56265 United States	Electronic Service		No	24-67
104	Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP		33 South Sixth St Ste 4200 Minneapolis MN, 55402 United States	Electronic Service		No	24-67
105	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	24-67

## Schedule C

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

## Schedule C

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
119	Marsha	Parlow	mparlow@grenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	24-67
120	Priti	Patel	ppatel@grenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369-4718 United States	Electronic Service		No	24-67
121	Earl	Pendleton	earl.pendleton@lowersioux.com	Lower Sioux Indian Community		39527 Highway 1 Morton MN, 56270 United States	Electronic Service		No	24-67
122	Gordon	Pietsch	gpietsch@grenergy.com	Great River Energy		12300 Elm Creek Blvd. Maple Grove MN, 55369-4718 United States	Electronic Service		No	24-67
123	Joe	Plumer	joe.plumer@redlakenation.org	Red Lake Nation		15484 Migizi Drive Red Lake MN, 56671 United States	Electronic Service		No	24-67
124	Kevin	Pranis	kpranis@liunagroc.com	Laborers' District Council of MN and ND		81 E Little Canada Road St. Paul MN, 55117 United States	Electronic Service		No	24-67
125	Robert	Prescott	bob.prescott@lowersioux.com	Lower Sioux Indian Community		39527 Highway 1 Morton MN, 56270 United States	Electronic Service		No	24-67
126	Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	1400 BRM Tower 445 Minnesota St St. Paul MN, 55101-2131 United States	Electronic Service		Yes	24-67
127	Kevin	Reuther	kreuther@mncenter.org	MN Center for Environmental Advocacy		26 E Exchange St, Ste 206 St. Paul MN, 55101-1667 United States	Electronic Service		No	24-67
128	Stephan	Roos	stephan.roos@state.mn.us		Minnesota Department of Agriculture	625 Robert St N Saint Paul MN, 55155-2538 United States	Electronic Service		No	24-67
129	Alan	Roy	alan.roy@whiteearth-nsn.gov	White Earth Nation		White Earth Tribal Headquarters 35500 Eagle View Road Ogema MN, 56569 United States	Electronic Service		No	24-67
130	Bill	Rudnicki	bill.rudnicki@shakopeedakota.org	Shakopee Mdewakanton Sioux Community		Shakopee Mdewakanton Sioux Community 2330 Sioux Trail NW Prior Lake MN, 55372 United States	Electronic Service		No	24-67
131	Nathaniel	Runke	nrunke@local49.org			611 28th St. NW Rochester	Electronic Service		No	24-67

## Schedule C

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						MN, 55901 United States				
132	Zachary	Ruzycki	zruzycki@grenergy.com	Great River Energy		12300 Elm Creek Boulevard Maple Grove MN, 55369 United States	Electronic Service		No	24-67
133	Miranda	Sam	miranda.sam@lowersioux.com	Lower Sioux Indian Community		39527 Reservation Highway 1 PO Box 308 Morton MN, 56270 United States	Electronic Service		No	24-67
134	Adam	Savariego	adams@uppersiouxcommunity-nsn.gov	Upper Sioux Community		5722 Travers Lane PO Box 147 Granite Falls MN, 56241 United States	Electronic Service		No	24-67
135	Ronald J.	Schwartau	rschwartau@noblesce.com	Nobles Electric Cooperative		22636 U.S. Hwy. 59 Worthington MN, 56187 United States	Electronic Service		No	24-67
136	Christine	Schwartz	regulatory.records@xcelenergy.com	Xcel Energy		414 Nicollet Mall, MN1180-07-MCA Minneapolis MN, 55401-1993 United States	Electronic Service		No	24-67
137	Jessie	Seim	jessie.seim@piic.org	Prairie Island Indian Community		5636 Sturgeon Lake Rd Welch MN, 55089 United States	Electronic Service		No	24-67
138	Darrell	Seki, Sr.	dseki@redlakenation.org			15484 Migizi Drive Red Lake MN, 56671 United States	Electronic Service		No	24-67
139	Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates		7400 Lyndale Ave S Ste 190 Richfield MN, 55423 United States	Electronic Service		Yes	24-67
140	Joel	Smith	jsmith@mnchippewatribe.org	Minnesota Chippewa Tribe		PO Box 217 Cass Lake MN, 56633 United States	Electronic Service		No	24-67
141	Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.		76 W Kellogg Blvd St. Paul MN, 55102 United States	Electronic Service		No	24-67
142	Nizhoni	Smith	nizhoni.smith@lowersioux.com	Lower Sioux Indian Community		PO Box 308 39527 Reservation Highway 1 Morton MN, 56270 United States	Electronic Service		No	24-67
143	Roger	Smith, Sr.	rogermsmithsr@fdlrez.com			1720 Big Lake Road Cloquet MN, 55720 United States	Electronic Service		No	24-67
144	Beth	Soholt	bsoholt@cleangridalliance.org	Clean Grid Alliance		570 Asbury Street Suite 201 St. Paul MN,	Electronic Service		No	24-67

## Schedule C

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						55104 United States				
145	Marie	Spry	mariespry@grandportage.com			PO Box 428 Grand Portage MN, 55605 United States	Electronic Service		No	24-67
146	Michael	Stalberger	michael.stalberger@blueearthcountymn.gov	Blue Earth County		410 S 5th Street Mankato MN, 56001 United States	Electronic Service		No	24-67
147	LeRoy	Staples Fairbanks III	leroy.fairbanks@llojibwe.net	Leech Lake Band of Ojibwe		190 Sailstar Drive NW Cass Lake MN, 56633 United States	Electronic Service		No	24-67
148	Byron E.	Starns	byron.starns@stinson.com	STINSON LLP		50 S 6th St Ste 2600 Minneapolis MN, 55402 United States	Electronic Service		No	24-67
149	Mark	Strohfus	mstrohfus@greenergy.com	Great River Energy		12300 Elm Creek Boulevard Maple Grove MN, 55369-4718 United States	Electronic Service		No	24-67
150	James M	Strommen	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered		150 S 5th St Ste 700 Minneapolis MN, 55402 United States	Electronic Service		No	24-67
151	Samuel	Strong	sam.strong@redlakenation.org	Red Lake Nation		15484 Migizi Drive Red Lake MN, 56671 United States	Electronic Service		No	24-67
152	Timothy	Sullivan	tsullivan@whe.org	Wright Hennepin Coop. Electric Assn.		6800 Electric Drive PO Box 330 Rockford MN, 55373 United States	Electronic Service		No	24-67
153	David	Sunderman	daves@benco.org	BENCO (DUPLICATE)		PO Box 8 Mankato MN, 56002-0008 United States	Electronic Service		No	24-67
154	Camille	Tanhoff	kamip@uppersiouxcommunity-nsn.gov	Upper Sioux Community		5722 Travers Lane PO BOX 147 Granite Falls MN, 56241 United States	Electronic Service		No	24-67
155	Tim	Thompson	tthompson@lrec.coop	Lake Region Electric Cooperative		PO Box 643 1401 South Broadway Pelican Rapids MN, 56572 United States	Electronic Service		No	24-67
156	Geoffrey	Tolley	geoff.tolley@gmail.com			855 Stanley Road Two Harbors MN, 55616-1176 United States	Electronic Service		No	24-67
157	Caralyn	Trutna	carrie@uppersiouxcommunity-nsn.gov	Upper Sioux Community		Upper Sioux Community P.O. Box 147 Granite Falls MN, 55372 United States	Electronic Service		No	24-67

## Schedule C

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
158	Jackie	Van Norman	jvannorman@grenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	24-67
159	Sam	Villella	sdvillella@gmail.com			10534 Alamo Street NE Blaine MN, 55449 United States	Electronic Service		No	24-67
160	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	24-67
161	Amelia	Vohs	avohs@mncenter.org	Minnesota Center for Environmental Advocacy		1919 University Avenue West Suite 515 St. Paul MN, 55104 United States	Electronic Service		No	24-67
162	Trent	Waite	twait@grenergy.com			null null, null United States	Electronic Service		No	24-67
163	Heather	Westra	heather.westra@piic.org	Prairie Island Indian Community		5636 Sturgeon Lake Rd Welch MN, 55089 United States	Electronic Service		No	24-67
164	Steve	White	steve.white@llojibwe.net	Leech Lake Band of Ojibwe		190 Sailstar Drive NW Cass Lake MN, 56633 United States	Electronic Service		No	24-67
165	Cody	Whitebear	cody.whitebear@piic.org	Prairie Island Indian Community		5636 Sturgeon Lake Road Welch MN, 55089 United States	Electronic Service		No	24-67
166	John	Williams	jwilliams@grenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	24-67
167	Virgil	Wind	virgil.wind@millelacsband.com	Mille Lacs Band of Ojibwe		43408 Oodena Drive Onamia MN, 56359 United States	Electronic Service		No	24-67
168	Joseph	Windler	jwindler@winthrop.com	Winthrop & Weinstine		225 South Sixth Street, Suite 3500 Minneapolis MN, 55402 United States	Electronic Service		No	24-67
169	Laurie	York	laurie.york@whiteearth-nsn.gov	White Earth Reservation Business Committee		PO Box 418 White Earth MN, 56591 United States	Electronic Service		No	24-67
170	Curtis	Zaun	czaun@mnseia.org	MnSEIA		PO Box 8141 Saint Paul MN, 55108 United States	Electronic Service		No	24-67
171	Kurt	Zimmerman	kwz@ibew160.org	Local Union #160, IBEW		2909 Anthony Ln St Anthony Village MN,	Electronic Service		No	24-67

**Schedule C**

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						55418-3238 United States				
172	Patrick	Zomer	pat.zomer@lawmoss.com	Moss & Barnett PA		150 S 5th St #1200 Minneapolis MN, 55402 United States	Electronic Service		No	24-67



August 11, 2025

Docket Nos. E015/RP-21-33; E017/RP-21-339; E002/RP-24-67

**In the Matter of Minnesota Power's 2021–2035 Integrated Resource Plan**

**In the Matter of Otter Tail Power's 2023–2037 Integrated Resource Plan**

**In the Matter of Xcel Energy's 2024–2040 Upper Midwest Integrated Resource Plan**

Attached are the 11 Relevant Retail Electric Regulatory Authority (RERRA) Verification Forms for Existing Resource Adequacy Deficiency that the Minnesota Public Utilities Commission provided for Northern States Power Co. d/b/a Xcel Energy's, Minnesota Power's, and Otter Tail Power Co.'s (Public Utilities') Expedited Resource Addition Study (ERAS) applications anticipated to be filed with the Midcontinent Independent Service Operation (MISO).

The Commission is the RERRA for the Public Utilities and reviewed projects based on the eligibility criteria provided in the MISO verification form template and Information Guide. More information is available in the revised Briefing Papers filed on July 23, 2025 in the instant dockets.

The Commission held a Special Meeting on July 24, 2025 to discuss its role in the MISO ERAS process and reviewed, accepted, and agreed to issue verification forms for the projects proposed by the Public Utilities (see attached letters dated July 26, 2025.) The Commission also delegated to the Executive Secretary to issue verification letters for additional wind, solar, or storage projects proposed by Xcel Energy (see attached letters dated August 1, 2025).

A handwritten signature in black ink that reads "Juan Coleman for".

Mike Bull

Acting Executive Secretary

## RERRA Verification Form for Existing Resource Adequacy Deficiency

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**Instructions:** This form may be completed by a representative of the applicable relevant electric retail regulatory authority (“RERRA”) where the load to be served by the Generating Facility is located and returned to the Interconnection Customer for submission to MISO. MISO is providing this form as a sample that may be submitted for ERAS projects that fall within Section 3.9.1(1)(ii). Use of this specific form is not required. RERRAs may develop and submit other forms of written verification to MISO.

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1. I, Mike Bull, am the Acting Executive Secretary of the Minnesota Public Utilities Commission.
2. I am completing this informational form on behalf of the Minnesota Public Utilities Commission and I confirm that the generation facility identified in the attached Interconnection Request should be considered for the ERAS process in order to meet a resource adequacy and/or reliability need that the Load Serving Entity or Interconnection Customer has claimed.
3. I verify to MISO that the proposed Interconnection Request project was included in an applicable state or RERRA process identifying its association with resource adequacy and/or reliability purposes, which may be triggered by, in whole or in part, but is not limited to:
  - A state energy forecast, or other forward-looking forecast;
  - The commencement of a state proceeding;
  - Review of a RERRA, LSE, or other state resource plan or document, which may include, but is not limited to: integrated resource plans, procurement plans, or other plan or study types;  
See: In the Matter of Xcel Energy’s 2024-2040 Upper Midwest Integrated Resource Plan and In the Matter of Xcel Energy’s Competitive Resource Acquisition Process for up to 800 Megawatts of Firm Dispatchable Generation, MPUC Docket No. E002/RP-24-67 and E002/CN-23-212, Order Approving Settlement Agreement with Modifications (April 21, 2025).
  - Response to a Request for Proposals (RFP);  
See: 2024 Wind, Solar, and Storage RFP, issued June 28, 2024, MPUC Docket No. E002/M-24-320.
  - Other process, or delegation of authority, as determined by the RERRA or RERRA regulations (including in retail choice states).

4. At this time, the Minnesota Public Utilities Commission has not completed its formal regulatory reviews of Xcel Energy's Sherco South Energy Storage project.
5. I understand that the generation facility must meet certain requirements specified in MISO's Tariff to qualify for the ERAS process.
6. Nothing within this informational form constitutes a finding that the resource has been formally approved under any of the Minnesota Public Utilities Commission's required procedures. Nothing herein constitutes an indication, approval, or certification by the Minnesota Public Utilities Commission that the Xcel Energy's Sherco South Energy Storage project is prudent, or that construction or purchase of that generation is or should be authorized at the retail level. That determination is reserved by the RERRA, and any retail RERRA process required under retail law and regulations is not waived. This form shall not be used as evidence by any party to support or justify a request for siting, a Certificate of Public Need or Necessity, cost recovery or any other required RERRA retail jurisdictional determination.

I may be contacted for further information at the following address:

Mike Bull  
Acting Executive Secretary  
121 7th Place E, Suite 350  
Saint Paul, MN 55101-2147  
Office: 651-201-2196  
Mike.Bull@state.mn.us

Date: 7/26/2025 Signature: Mike Bull

## RERRA Verification Form for Existing Resource Adequacy Deficiency

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**Instructions:** This form may be completed by a representative of the applicable relevant electric retail regulatory authority (“RERRA”) where the load to be served by the Generating Facility is located and returned to the Interconnection Customer for submission to MISO. MISO is providing this form as a sample that may be submitted for ERAS projects that fall within Section 3.9.1(1)(ii). Use of this specific form is not required. RERRAs may develop and submit other forms of written verification to MISO.

---

1. I, Mike Bull, am the Acting Executive Secretary of the Minnesota Public Utilities Commission.
2. I am completing this informational form on behalf of the Minnesota Public Utilities Commission and I confirm that the generation facility identified in the attached Interconnection Request should be considered for the ERAS process in order to meet a resource adequacy and/or reliability need that the Load Serving Entity or Interconnection Customer has claimed.
3. I verify to MISO that the proposed Interconnection Request project was included in an applicable state or RERRA process identifying its association with resource adequacy and/or reliability purposes, which may be triggered by, in whole or in part, but is not limited to:
  - A state energy forecast, or other forward-looking forecast;
  - The commencement of a state proceeding;  
[Insert Brief Description of Proceeding including docket number and documents in which project is mentioned]
  - Review of a RERRA, LSE, or other state resource plan or document, which may include, but is not limited to: integrated resource plans, procurement plans, or other plan or study types;  
See: In the Matter of Xcel Energy’s 2024-2040 Upper Midwest Integrated Resource Plan and In the Matter of Xcel Energy’s Competitive Resource Acquisition Process for up to 800 Megawatts of Firm Dispatchable Generation, MPUC Docket No. E002/RP-24-67 and E002/CN-23-212, Order Approving Settlement Agreement with Modifications (April 21, 2025).
  - Response to a Request for Proposals (RFP); or [Attach RFP Information or Insert Brief Description]
  - Other process, or delegation of authority, as determined by the RERRA or RERRA regulations (including in retail choice states).  
[Insert Brief Description]

4. At this time, the Minnesota Public Utilities Commission has not completed its formal regulatory reviews of Xcel Energy's Cannon Falls Project.

Not Applicable in [State].

5. I understand that the generation facility must meet certain requirements specified in MISO's Tariff to qualify for the ERAS process.
6. Nothing within this informational form constitutes a finding that the resource has been formally approved under any of the Minnesota Public Utilities Commission's required procedures. Nothing herein constitutes an indication, approval, or certification by the Minnesota Public Utilities Commission that the Xcel Energy's Cannon Falls Project is prudent, or that construction or purchase of that generation is or should be authorized at the retail level. That determination is reserved by the RERRA, and any retail RERRA process required under retail law and regulations is not waived. This form shall not be used as evidence by any party to support or justify a request for siting, a Certificate of Public Need or Necessity, cost recovery or any other required RERRA retail jurisdictional determination.

I may be contacted for further information at the following address:

Mike Bull  
Acting Executive Secretary  
121 7th Place E, Suite 350  
Saint Paul, MN 55101-2147  
Office: 651-201-2196  
Mike.Bull@state.mn.us

Date: 7/26/2025      Signature: Michael Bull

## RERRA Verification Form for Existing Resource Adequacy Deficiency

---

**Instructions:** This form may be completed by a representative of the applicable relevant electric retail regulatory authority (“RERRA”) where the load to be served by the Generating Facility is located and returned to the Interconnection Customer for submission to MISO. MISO is providing this form as a sample that may be submitted for ERAS projects that fall within Section 3.9.1(1)(ii). Use of this specific form is not required. RERRAs may develop and submit other forms of written verification to MISO.

---

1. I, Mike Bull, am the Acting Executive Secretary of the Minnesota Public Utilities Commission.
  
2. I am completing this informational form on behalf of the Minnesota Public Utilities Commission and I confirm that the generation facility identified in the attached Interconnection Request should be considered for the ERAS process in order to meet a resource adequacy and/or reliability need that the Load Serving Entity or Interconnection Customer has claimed.
  
3. I verify to MISO that the proposed Interconnection Request project was included in an applicable state or RERRA process identifying its association with resource adequacy and/or reliability purposes, which may be triggered by, in whole or in part, but is not limited to:
  - A state energy forecast, or other forward-looking forecast;
  
  - The commencement of a state proceeding;  
[Insert Brief Description of Proceeding including docket number and documents in which project is mentioned]
  
  - Review of a RERRA, LSE, or other state resource plan or document, which may include, but is not limited to: integrated resource plans, procurement plans, or other plan or study types;  
Pursuant to the Integrated Resource Plan filed by Minnesota Power on February 1st, 2021 in docket E015/RP-21-33, the Minnesota Public Utilities Commission issued an Order Approving Plan and Setting Additional Requirements on January 9th, 2023 which directed Minnesota Power to acquire at least 300 and up to 400 MW of wind, with at least 200 MW in service by 2026 as practicable.
  
  - Response to a Request for Proposals (RFP); or [Attach RFP]  
Pursuant to the Minnesota Public Utilities Commission order approving Minnesota Power’s Integrated Resource Plan in docket E015/RP-21-33, Minnesota Power issued a Request for Proposals for Wind Resource on February 15, 2024. The Longspur wind project was submitted into this RFP and is currently being evaluated along with other project submissions.

- Other process, or delegation of authority, as determined by the RERRA or RERRA regulations (including in retail choice states).  
[Insert Brief Description]

4. At this time, the Minnesota Public Utilities Commission **has not** completed its formal regulatory reviews of Longspur Wind Project.

Not Applicable in [State].

- 5. I understand that the generation facility must meet certain requirements specified in MISO's Tariff to qualify for the ERAS process.
- 6. Nothing within this informational form constitutes a finding that the resource has been formally approved under any of the Minnesota Public Utilities Commission's required procedures. Nothing herein constitutes an indication, approval, or certification by the Minnesota Public Utilities Commission that the Longspur Wind Project is prudent, or that construction or purchase of that generation is or should be authorized at the retail level. That determination is reserved by the RERRA, and any retail RERRA process required under retail law and regulations is not waived. This form shall not be used as evidence by any party to support or justify a request for siting, a Certificate of Public Need or Necessity, cost recovery or any other required RERRA retail jurisdictional determination.

I may be contacted for further information at the following address:

Mike Bull  
Acting Executive Secretary  
121 7th Place E, Suite 350  
Saint Paul, MN 55101-2147  
Office: 651-201-2196  
Mike.Bull@state.mn.us

Date: 7/26/2025      Signature: Michael Bull

## RERRA Verification Form for Existing Resource Adequacy Deficiency

---

**Instructions:** This form may be completed by a representative of the applicable relevant electric retail regulatory authority (“RERRA”) where the load to be served by the Generating Facility is located and returned to the Interconnection Customer for submission to MISO. MISO is providing this form as a sample that may be submitted for ERAS projects that fall within Section 3.9.1(1)(ii). Use of this specific form is not required. RERRAs may develop and submit other forms of written verification to MISO.

---

1. I, Mike Bull, am the Acting Executive Secretary of the Minnesota Public Utilities Commission.
2. I am completing this informational form on behalf of the Minnesota Public Utilities Commission and I confirm that the generation facility identified in the attached Interconnection Request should be considered for the ERAS process in order to meet a resource adequacy and/or reliability need that the Load Serving Entity or Interconnection Customer has claimed.
3. I verify to MISO that the proposed Interconnection Request project was included in an applicable state or RERRA process identifying its association with resource adequacy and/or reliability purposes, which may be triggered by, in whole or in part, but is not limited to:
  - A state energy forecast, or other forward-looking forecast;
  - The commencement of a state proceeding;  
[Insert Brief Description of Proceeding including docket number and documents in which project is mentioned]
  - Review of a RERRA, LSE, or other state resource plan or document, which may include, but is not limited to: integrated resource plans, procurement plans, or other plan or study types;  
*Pursuant to the Integrated Resource Plan filed by Minnesota Power on February 1st, 2021 in docket E015/RP-21-33, the Minnesota Public Utilities Commission issued an Order Approving Plan and Setting Additional Requirements on January 9th, 2023 which directed Minnesota Power to acquire at up to 300 MW of regional/in-service territory or net-zero solar.*
  - Response to a Request for Proposals (RFP);  
*Pursuant to the Minnesota Public Utilities Commission order approving Minnesota Power’s Integrated Resource Plan in docket E015/RP-21-33, Minnesota Power issued a Request for Proposals for Solar Resource on November 15th, 2023. The Boswell Solar project was submitted into this RFP and subsequently selected. Pursuant to*

the filing submitted by Minnesota Power on November 13th, 2024 in docket E015/M-24-344 seeking Approval of Investments and Expenditures in the Boswell Solar Project through Minnesota Power's Renewable Resource Rider, the Minnesota Public Utilities Commission issued an Order Approving Investment in Solar Project and Cost Recovery via Rider on May 13th, 2025 in conjunction with the Request for Proposals for Solar Resource.

- Other process, or delegation of authority, as determined by the RERRA or RERRA regulations (including in retail choice states).  
[Insert Brief Description]

4. At this time, the Minnesota Public Utilities Commission **has not** completed its formal regulatory reviews of **Boswell Solar Project** .

Not Applicable in [State].

- 5. I understand that the generation facility must meet certain requirements specified in MISO's Tariff to qualify for the ERAS process.
- 6. Nothing within this informational form constitutes a finding that the resource has been formally approved under any of the Minnesota Public Utilities Commission's required procedures. Nothing herein constitutes an indication, approval, or certification by the Minnesota Public Utilities Commission that the **Boswell Solar Project** is prudent, or that construction or purchase of that generation is or should be authorized at the retail level. That determination is reserved by the RERRA, and any retail RERRA process required under retail law and regulations is not waived. This form shall not be used as evidence by any party to support or justify a request for siting, a Certificate of Public Need or Necessity, cost recovery or any other required RERRA retail jurisdictional determination.

I may be contacted for further information at the following address:

Mike Bull  
Acting Executive Secretary  
121 7th Place E, Suite 350  
Saint Paul, MN 55101-2147  
Office: 651-201-2196  
Mike.Bull@state.mn.us

Date: 7/26/2025 Signature: Michael Bull

## RERRA Verification Form for Existing Resource Adequacy Deficiency

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**Instructions:** This form may be completed by a representative of the applicable relevant electric retail regulatory authority (“RERRA”) where the load to be served by the Generating Facility is located and returned to the Interconnection Customer for submission to MISO. MISO is providing this form as a sample that may be submitted for ERAS projects that fall within Section 3.9.1(1)(ii). Use of this specific form is not required. RERRAs may develop and submit other forms of written verification to MISO.

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1. I, Mike Bull, am the Acting Executive Secretary of the Minnesota Public Utilities Commission.
2. I am completing this informational form on behalf of the Minnesota Public Utilities Commission and I confirm that the generation facility identified in the attached Interconnection Request should be considered for the ERAS process in order to meet a resource adequacy and/or reliability need that the Load Serving Entity or Interconnection Customer has claimed.
3. I verify to MISO that the proposed Interconnection Request project was included in an applicable state or RERRA process identifying its association with resource adequacy and/or reliability purposes, which may be triggered by, in whole or in part, but is not limited to:
  - A state energy forecast, or other forward-looking forecast;
  - The commencement of a state proceeding;  
[Insert Brief Description of Proceeding including docket number and documents in which project is mentioned]
  - Review of a RERRA, LSE, or other state resource plan or document, which may include, but is not limited to: integrated resource plans, procurement plans, or other plan or study types;  
*Pursuant to the Integrated Resource Plan filed by Otter Tail Power on 9/1/2021 in docket RP-21-339, the Minnesota Public Utilities Commission issued and directed Otter Tail Power to procure 20-75 MWs of battery by 12/31/2029 per the 7/22/2024 Order.*
  - Response to a Request for Proposals (RFP); or [Attach RFP]  
[Insert Brief Description]
  - Other process, or delegation of authority, as determined by the RERRA or RERRA regulations (including in retail choice states).  
[Insert Brief Description]

4. At this time, the Minnesota Public Utilities Commission **has not** completed its formal regulatory reviews of **Hoot Lake Battery Project**.

Not Applicable in [State].

5. I understand that the generation facility must meet certain requirements specified in MISO's Tariff to qualify for the ERAS process.

6. Nothing within this informational form constitutes a finding that the resource has been formally approved under any of the Minnesota Public Utilities Commission's required procedures. Nothing herein constitutes an indication, approval, or certification by the Minnesota Public Utilities Commission that the **Hoot Lake Battery Project** is prudent, or that construction or purchase of that generation is or should be authorized at the retail level. That determination is reserved by the RERRA, and any retail RERRA process required under retail law and regulations is not waived. This form shall not be used as evidence by any party to support or justify a request for siting, a Certificate of Public Need or Necessity, cost recovery or any other required RERRA retail jurisdictional determination.

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See: In the Matter of Xcel Energy’s 2024-2040 Upper Midwest Integrated Resource Plan and In the Matter of Xcel Energy’s Competitive Resource Acquisition Process for up to 800 Megawatts of Firm Dispatchable Generation, MPUC Docket No. E002/RP-24-67 and E002/CN-23-212, Order Approving Settlement Agreement with Modifications (April 21, 2025).
  - Response to a Request for Proposals (RFP); or
  - Other process, or delegation of authority, as determined by the RERRA or RERRA regulations (including in retail choice states).

4. At this time, the Minnesota Public Utilities Commission has not completed its formal regulatory reviews of Xcel Energy's Redwood Energy Storage Project.
5. I understand that the generation facility must meet certain requirements specified in MISO's Tariff to qualify for the ERAS process.
6. Nothing within this informational form constitutes a finding that the resource has been formally approved under any of the Minnesota Public Utilities Commission's required procedures. Nothing herein constitutes an indication, approval, or certification by the Minnesota Public Utilities Commission that the Xcel Energy's Redwood Energy Storage Project is prudent, or that construction or purchase of that generation is or should be authorized at the retail level. That determination is reserved by the RERRA, and any retail RERRA process required under retail law and regulations is not waived. This form shall not be used as evidence by any party to support or justify a request for siting, a Certificate of Public Need or Necessity, cost recovery or any other required RERRA retail jurisdictional determination.

I may be contacted for further information at the following address:

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Saint Paul, MN 55101-2147  
Office: 651-201-2196  
Mike.Bull@state.mn.us

Date: 8/1/2025      Signature: 

## RERRA Verification Form for Existing Resource Adequacy Deficiency

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3. I verify to MISO that the proposed Interconnection Request project was included in an applicable state or RERRA process identifying its association with resource adequacy and/or reliability purposes, which may be triggered by, in whole or in part, but is not limited to:
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[Insert Brief Description of Proceeding including docket number and documents in which project is mentioned]
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See: In the Matter of Xcel Energy’s 2024-2040 Upper Midwest Integrated Resource Plan and In the Matter of Xcel Energy’s Competitive Resource Acquisition Process for up to 800 Megawatts of Firm Dispatchable Generation, MPUC Docket No. E002/RP-24-67 and E002/CN-23-212, Order Approving Settlement Agreement with Modifications (April 21, 2025)
  - Response to a Request for Proposals (RFP); or
  - Other process, or delegation of authority, as determined by the RERRA or RERRA regulations (including in retail choice states).  
[Insert Brief Description]

4. At this time, the Minnesota Public Utilities Commission has not completed its formal regulatory reviews of Xcel Energy's Lake Charlotte Energy Storage Project.
5. I understand that the generation facility must meet certain requirements specified in MISO's Tariff to qualify for the ERAS process.
6. Nothing within this informational form constitutes a finding that the resource has been formally approved under any of the Minnesota Public Utilities Commission's required procedures. Nothing herein constitutes an indication, approval, or certification by the Minnesota Public Utilities Commission that the Xcel Energy's Lake Charlotte Energy Storage Project is prudent, or that construction or purchase of that generation is or should be authorized at the retail level. That determination is reserved by the RERRA, and any retail RERRA process required under retail law and regulations is not waived. This form shall not be used as evidence by any party to support or justify a request for siting, a Certificate of Public Need or Necessity, cost recovery or any other required RERRA retail jurisdictional determination.

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3. I verify to MISO that the proposed Interconnection Request project was included in an applicable state or RERRA process identifying its association with resource adequacy and/or reliability purposes, which may be triggered by, in whole or in part, but is not limited to:
  - A state energy forecast, or other forward-looking forecast;
  - The commencement of a state proceeding;
  - Review of a RERRA, LSE, or other state resource plan or document, which may include, but is not limited to: integrated resource plans, procurement plans, or other plan or study types;
 

See: In the Matter of Xcel Energy’s 2024-2040 Upper Midwest Integrated Resource Plan and In the Matter of Xcel Energy’s Competitive Resource Acquisition Process for up to 800 Megawatts of Firm Dispatchable Generation, MPUC Docket No. E002/RP-24-67 and E002/CN-23-212, Order Approving Settlement Agreement with Modifications (April 21, 2025).

See: In the Matter of the Investigation into Transmission-Curtailment Matters, Drivers, and Potential Solutions to Limitations Resulting from the Nobles County Substation, MPUC Docket No. E-999/CI-24-316, Order Establishing Filing Requirements (March 24, 2025).
  - Response to a Request for Proposals (RFP);
  - Other process, or delegation of authority, as determined by the RERRA or RERRA regulations (including in retail choice states).

4. At this time, the Minnesota Public Utilities Commission **has not** completed its formal regulatory reviews of Xcel Energy's Nobles Energy Storage Project.
  
5. I understand that the generation facility must meet certain requirements specified in MISO's Tariff to qualify for the ERAS process.
  
6. Nothing within this informational form constitutes a finding that the resource has been formally approved under any of the Minnesota Public Utilities Commission's required procedures. Nothing herein constitutes an indication, approval, or certification by the Minnesota Public Utilities Commission that the Xcel Energy's Nobles Energy Storage Project is prudent, or that construction or purchase of that generation is or should be authorized at the retail level. That determination is reserved by the RERRA, and any retail RERRA process required under retail law and regulations is not waived. This form shall not be used as evidence by any party to support or justify a request for siting, a Certificate of Public Need or Necessity, cost recovery or any other required RERRA retail jurisdictional determination.

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3. I verify to MISO that the proposed Interconnection Request project was included in an applicable state or RERRA process identifying its association with resource adequacy and/or reliability purposes, which may be triggered by, in whole or in part, but is not limited to:
  - A state energy forecast, or other forward-looking forecast;
  - The commencement of a state proceeding;  
[Insert Brief Description of Proceeding including docket number and documents in which project is mentioned]
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See: In the Matter of Xcel Energy’s 2024-2040 Upper Midwest Integrated Resource Plan and In the Matter of Xcel Energy’s Competitive Resource Acquisition Process for up to 800 Megawatts of Firm Dispatchable Generation, MPUC Docket No. E002/RP-24-67 and E002/CN-23-212, Order Approving Settlement Agreement with Modifications (April 21, 2025).
  - Response to a Request for Proposals (RFP);  
See: 2024 Wind, Solar, and Storage RFP, MPUC Docket No. E002/M-24-230.
  - Other process, or delegation of authority, as determined by the RERRA or RERRA regulations (including in retail choice states).

4. At this time, the Minnesota Public Utilities Commission **has not** completed its formal regulatory reviews of Xcel Energy's Sandhill Energy Storage Project.
5. I understand that the generation facility must meet certain requirements specified in MISO's Tariff to qualify for the ERAS process.
6. Nothing within this informational form constitutes a finding that the resource has been formally approved under any of the Minnesota Public Utilities Commission's required procedures. Nothing herein constitutes an indication, approval, or certification by the Minnesota Public Utilities Commission that the Xcel Energy's Sandhill Energy Storage Project is prudent, or that construction or purchase of that generation is or should be authorized at the retail level. That determination is reserved by the RERRA, and any retail RERRA process required under retail law and regulations is not waived. This form shall not be used as evidence by any party to support or justify a request for siting, a Certificate of Public Need or Necessity, cost recovery or any other required RERRA retail jurisdictional determination.

I may be contacted for further information at the following address:

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Acting Executive Secretary  
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## RERRA Verification Form for Existing Resource Adequacy Deficiency

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3. I verify to MISO that the proposed Interconnection Request project was included in an applicable state or RERRA process identifying its association with resource adequacy and/or reliability purposes, which may be triggered by, in whole or in part, but is not limited to:
  - A state energy forecast, or other forward-looking forecast;
  - The commencement of a state proceeding;
  - Review of a RERRA, LSE, or other state resource plan or document, which may include, but is not limited to: integrated resource plans, procurement plans, or other plan or study types;  
See attached *In the Matter of Xcel Energy’s 2024-2040 Upper Midwest Integrated Resource Plan* and *In the Matter of Xcel Energy’s Competitive Resource Acquisition Process for up to 800 Megawatts of Firm Dispatchable Generation*, MPUC Docket No. E002/RP-24-67 and E002/CN-23-212, Order Approving Settlement Agreement with Modifications (April 21, 2025).
  - Response to a Request for Proposals (RFP);  
See: *Wind Development Transfer RFP*, MPUC Docket No. E002/M-23-342.
  - Other process, or delegation of authority, as determined by the RERRA or RERRA regulations (including in retail choice states).

4. At this time, the Minnesota Public Utilities Commission has not completed its formal regulatory reviews of Xcel Energy's Little Rock Wind and Storage Project.
5. I understand that the generation facility must meet certain requirements specified in MISO's Tariff to qualify for the ERAS process.
6. Nothing within this informational form constitutes a finding that the resource has been formally approved under any of the Minnesota Public Utilities Commission's required procedures. Nothing herein constitutes an indication, approval, or certification by the Minnesota Public Utilities Commission that the Xcel Energy's Little Rock Wind and Storage Project is prudent, or that construction or purchase of that generation is or should be authorized at the retail level. That determination is reserved by the RERRA, and any retail RERRA process required under retail law and regulations is not waived. This form shall not be used as evidence by any party to support or justify a request for siting, a Certificate of Public Need or Necessity, cost recovery or any other required RERRA retail jurisdictional determination.

I may be contacted for further information at the following address:

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*See: In the Matter of Xcel Energy’s 2024-2040 Upper Midwest Integrated Resource Plan and In the Matter of Xcel Energy’s Competitive Resource Acquisition Process for up to 800 Megawatts of Firm Dispatchable Generation, MPUC Docket No. E002/RP-24-67 and E002/CN-23-212, Order Approving Settlement Agreement with Modifications (April 21, 2025).*
  - Response to a Request for Proposals (RFP); or [Attach RFP]  
*See: 2024 Wind, Solar, and Storage RFP, MPUC Docket No. E002/M-24-230.*
  - Other process, or delegation of authority, as determined by the RERRA or RERRA regulations (including in retail choice states).

4. At this time, the Minnesota Public Utilities Commission has not completed its formal regulatory reviews of Xcel Energy's Benton Solar II and Benton Energy Storage II Projects.
5. I understand that the generation facility must meet certain requirements specified in MISO's Tariff to qualify for the ERAS process.
6. Nothing within this informational form constitutes a finding that the resource has been formally approved under any of the Minnesota Public Utilities Commission's required procedures. Nothing herein constitutes an indication, approval, or certification by the Minnesota Public Utilities Commission that the Xcel Energy's Benton Solar II and Benton Energy Storage II Projects is prudent, or that construction or purchase of that generation is or should be authorized at the retail level. That determination is reserved by the RERRA, and any retail RERRA process required under retail law and regulations is not waived. This form shall not be used as evidence by any party to support or justify a request for siting, a Certificate of Public Need or Necessity, cost recovery or any other required RERRA retail jurisdictional determination.

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Saint Paul, MN 55101-2147  
Office: 651-201-2196  
Mike.Bull@state.mn.us

Date: 8/1/2025      Signature: 



414 Nicollet Mall  
Minneapolis, MN 55401

September 12, 2025

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

—Via Electronic Filing—

RE: UPDATE - PROPOSED GENERATOR PROJECTS FOR MISO'S  
EXPEDITED RESOURCE ADDITION STUDY (ERAS)  
DOCKET NO. E002/RP-24-67

Dear Ms. Bergman:

Northern States Power Company, doing business as Xcel Energy, submits to the Minnesota Public Utilities Commission this update regarding the generator projects we requested the Commission to verify as the Relevant Electric Retail Regulatory Authority (RERRA) to the Midcontinent Independent System Operator (MISO) for inclusion in its Expedited Resource Addition Study (ERAS) process.

**A. Background**

The MISO ERAS process was developed to address near-term interconnection needs to support resource adequacy and reliability needs. It offers a limited, first-come, first-served pathway for up to 68 projects to be studied under an accelerated timeline, with no more than 10 projects evaluated per quarter. This structure is intended to relieve pressure on the standard interconnection queue, which currently faces delays of four to five years, and to ensure that critical resources can be brought online in a timely and orderly manner. The process is designed to issue a Generator Interconnection Agreement in three months.

The Commission, acting as the RERRA, held a Special Meeting on July 24, 2025 to discuss its role in the MISO ERAS process and reviewed, accepted, and agreed to issue verification forms for the projects proposed by Xcel Energy, Minnesota Power, and Otter Tail Power. The Commission also delegated authority to the Executive Secretary to issue ERAS verification forms for additional projects proposed by the

utilities.<sup>1</sup> The Company's proposal outlined how the projects are consistent with its approved Integrated Resource Plan and are intended to address urgent resource adequacy and reliability needs in Minnesota.

## **B. ERAS Timeline**

The first ERAS cycle began on August 6, 2025 at 8:00 a.m. EST, when MISO opened its online application portal. To be considered eligible for the first quarterly study cycle, applications had to be submitted no later than August 11, 2025. Once submitted, MISO has 15 business days to rank the projects in order of submittal and review the applications for completeness. If deficiencies are identified, applicants are notified and given 10 business days to correct them – with the deadline to cure deficiencies for the first Study cycle being September 2, 2025. If deficiencies are not cured by this Study kickoff date, the project is deferred to a future cycle.

ERAS operates on a quarterly study cycle schedule, with four study periods each year:

- **Quarter 1:** First business day of March through the last business day of May.
- **Quarter 2:** First business day of July through the last business day of August.
- **Quarter 3:** First business day of September through the last business day of November.
- **Quarter 4:** First business day of December through the last business day of February.

Each quarterly cycle is limited to 10 projects, which MISO determines based on time of submittal and geographic and technical compatibility. Projects are evaluated sequentially and are expected to be completed within 60 days of the study kickoff. The ERAS projects undergo the same suite of studies conducted under the MISO Definitive Planning Process.

Following completion of the Study, the Generation Interconnection Agreement (GIA) negotiation and issuance process begins. The Interconnection Customer (IC) and Transmission Owner (TO) have 20 business days to negotiate the GIA. MISO then has 10 business days to provide the final Expedited GIA (EGIA). Once the EGIA is issued, the IC and TO have 10 business days to execute it or request that MISO file it unexecuted. MISO then has an additional 10 business days to execute and/or file an unexecuted EGIA with FERC.

In total, the ERAS process – from application submission to GIA issuance – is designed to be completed within approximately three calendar months.

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<sup>1</sup> The Commission's verification confirms the projects' eligibility for the ERAS process; it did not constitute final regulatory approval or a finding that the projects are in the public interest.

### C. ERAS Application Status for Company-Supported Projects

On August 6, 2025, the Company submitted an ERAS application to MISO for the following Commission verified projects:

- 300 MW Nobles Energy Storage and
- 300 MW Sherco South Energy Storage.

Additionally, third-party developers submitted ERAS applications to MISO in support of the Company's resource needs for the following Commission-verified projects:

- 200 MW Sandhill Energy Storage,
- 100 MW Benton II Solar plus 300 MW Benton Energy Storage, and
- 45-70 MW of incremental capacity that would result from planned upgrades at the Cannon Falls Energy Center.

On August 26, 2025, MISO published a preliminary list of ERAS projects, indicating the order the applications were received. At that point in the process, the Study order is subject to change based on the timing of deficiency cures and whether multiple projects impact or resolve the same system constraint, in which case not all may be selected for evaluation. Projects receiving a deficiency notice had until September 2, 2025 to cure the deficiency.

On September 4, 2025, MISO announced the first 10 projects selected for study in ERAS Cycle 1 (2025, Quarter 3).<sup>2</sup> Selection was based on application submission time, common constraint review, application withdrawals, and timely cure of application deficiencies. None of the projects the Company proposed for RERRA verification were selected for study in Cycle 1.

Based on current queue position, we anticipate that at least one of the Company's projects will be selected in Cycle 2, which begins on December 1, 2025. MISO has confirmed that applications submitted during the August 6-11, 2025 window for Cycle 1 will automatically carry forward into Cycle 2, and applicants will not need to reapply on November 6, 2025 for ERAS Cycle 2 (2025, Quarter 4).

### D. Next Steps

Based on the ERAS timeline, if any of our projects are selected for study in the 2025, Quarter 4 Cycle 2, we anticipate the need for the generator project owner to execute a GIA with MISO by mid-February 2026. At that time, the project owner would be

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<sup>2</sup> See [ERAS Cycle 1717096.pdf](#).

required to make a non-refundable “Milestone M2” payment of \$24,000/MW – ranging from approximately \$1 million for the smallest project to \$7.2 million for the largest.

To ensure the projects remain on track to take advantage of expiring federal tax incentives and do not incur significant costs prior to the Commission approving them as Company resources, we anticipate filing a petition seeking Commission approval of our ERAS Cycle 1 projects in October 2025. We anticipate requesting a decision from the Commission by mid-February 2026 to ensure the Company and generator projects have the certainty needed to proceed with execution of the GIA and associated financial commitments.

In addition to the financial and procedural timelines in the ERAS process, we emphasize that the expiring federal tax credits add urgency to the review and approval process. Timely Commission action will help ensure that eligible projects can qualify for these incentives, which are important to maintaining affordability and advancing clean energy deployment.

We appreciate the Commission’s support and acknowledge the importance of allowing sufficient time for review by the Commission. The Company remains committed to providing all necessary documentation promptly to facilitate a comprehensive and efficient evaluation process.

We have electronically filed this document with the Minnesota Public Utilities Commission. Copies have been served on parties on the attached service list. Please contact Jody Londo at [jody.l.londo@xcelenergy.com](mailto:jody.l.londo@xcelenergy.com) or me at [bria.e.shea@xcelenergy.com](mailto:bria.e.shea@xcelenergy.com) if you have any questions regarding this filing.

Sincerely,

*/s/ Bria E. Shea*

BRIA E. SHEA  
REGIONAL VICE PRESIDENT, REGULATORY POLICY

Encls  
c: Service List

**CERTIFICATE OF SERVICE**

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

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

or

xx electronic filing

**Docket No. E002/RP-24-67**

Dated this 12th day of September 2025

/s/

---

Marie Horner  
Regulatory Administrator

## Schedule E

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
1	Steve	Albrecht	steve.albrecht@shakopeedakota.org	Shakopee Mdewakanton Sioux Community		Shakopee Mdewakanton Sioux Community 2330 Sioux Trail NW Prior Lake MN, 55372 United States	Electronic Service		No	24-67
2	Jared	Alholinna	jaholinna@greenergy.com	Great River Energy		12300 Elm Creek Boulevard Maple Grove MN, 55369 United States	Electronic Service		No	24-67
3	Keith	Anderson	keith.anderson@shakopeedakota.org	Shakopee Mdewakanton Sioux Community		Shakopee Mdewakanton Sioux Community 2330 Sioux Trail NW Prior Lake MN, 55372 United States	Electronic Service		No	24-67
4	Shannon	Anderson	sanderson@solarunitedneighbors.org	Solar United Neighbors			Electronic Service		No	24-67
5	Beren	Argetsinger	bargetsinger@keyesfox.com			PO BOX 166 Burdett NY, 14818 United States	Electronic Service		No	24-67
6	Ray	Auginaush, Sr.	ray.auginaush@whiteearth-nsn.gov	White Earth Nation		White Earth Tribal Headquarters 35500 Eagle View Road Ogema MN, 56569 United States	Electronic Service		No	24-67
7	Mark	Bakk	mbakk@lcp.coop	Lake Country Power		26039 Bear Ridge Drive Cohasset MN, 55721 United States	Electronic Service		No	24-67
8	Daniel	Becchetti	dbecchetti@greenergy.com	Great River Energy		12300 Elm Creek Boulevard Maple Grove MN, 55369 United States	Electronic Service		No	24-67
9	Todd	Beck	tbeck@greenergy.com			null null, null United States	Electronic Service		No	24-67
10	Amadeo	Bellino	amadeo.bellino@whiteearth-nsn.gov	White Earth Nation		White Earth Tribal Headquarters 35500 Eagle View Road Ogema MN, 56569 United States	Electronic Service		No	24-67
11	Melanie	Benjamin	melanie.benjamin@millelacsband.com			43408 Oodena Drive Onamia MN, 56359 United States	Electronic Service		No	24-67
12	Sasha	Bergman	sasha.bergman@state.mn.us		Public Utilities Commission	121 7th PI E Ste 350 Saint Paul MN, 55101-2147 United States	Electronic Service		No	24-67
13	Laura	Bishop	laura.bishop@state.mn.us		Minnesota Pollution Control Agency	520 Lafayette Rd Saint Paul MN, 55155 United States	Electronic Service		No	24-67

## Schedule E

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
14	Ingrid	Bjorklund	ingrid@bjorklundlaw.com	Bjorklund Law, PLLC		855 Village Center Drive #256 North Oaks MN, 55127 United States	Electronic Service		No	24-67
15	Hunter	Boldt	hunterboldt@redlakenation.org	Red Lake Nation		15484 Migizi Drive Red Lake MN, 56671 United States	Electronic Service		No	24-67
16	Peter	Boney	pboney@boisforte-nsn.gov	Bois Forte Band of Chippewa		Bois Forte Tribal Government 5344 Lakeshore Drive Nett Lake MN, 55772 United States	Electronic Service		No	24-67
17	Sheldon	Boyd	sheldon.boyd@millelacsband.com	Mille Lacs Band of Ojibwe		43408 Oodena Drive Onamia MN, 56359 United States	Electronic Service		No	24-67
18	Jon	Brekke	jbrekke@grenergy.com	Great River Energy		12300 Elm Creek Boulevard Maple Grove MN, 55369-4718 United States	Electronic Service		No	24-67
19	Matthew	Brodin	mbrodin@allete.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	24-67
20	B. Andrew	Brown	brown.andrew@dorsey.com	Dorsey & Whitney LLP		Suite 1500 50 South Sixth Street Minneapolis MN, 55402-1498 United States	Electronic Service		No	24-67
21	Marvin Ray	Bruneau	marvin.bruneau@millelacsband.com	Mille Lacs Band of Ojibwe		43408 Oodena Drive Onamia MN, 56359 United States	Electronic Service		No	24-67
22	Christina	Brusven	cbrusven@fredlaw.com	Fredrikson Byron		60 S 6th St Ste 1500 Minneapolis MN, 55402-4400 United States	Electronic Service		No	24-67
23	Scott	Buchanan	scottbuchanan@fdlrez.com	Fond du Lac Band of Lake Superior Chippewa		1720 Big Lake Road Cloquet MN, 55720 United States	Electronic Service		No	24-67
24	Shelley	Buck	shelley.buck@piic.org	Prairie Island Indian Community		Prairie Island Indian Community 5636 Sturgeon Lake Road Welch MN, 55089 United States	Electronic Service		No	24-67
25	Robert	Budreau	robert.budreau@llojibwe.net	Leech Lake Band of Ojibwe		190 Sailstar Drive NW Cass Lake MN, 56633 United States	Electronic Service		No	24-67

## Schedule E

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

## Schedule E

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						United States				
39	Ian M.	Dobson	ian.m.dobson@xcelenergy.com	Xcel Energy		414 Nicollet Mall, 401-8 Minneapolis MN, 55401 United States	Electronic Service		No	24-67
40	Shane	Drift	sdrift@boisforte-nsn.gov	Bois Forte Band of Chippewa		Bois Forte Tribal Government 5344 Lakeshore Drive Nett Lake MN, 55772 United States	Electronic Service		No	24-67
41	Christopher	Droske	christopher.droske@minneapolismn.gov	Northern States Power Company dba Xcel Energy-Elec		661 5th Ave N Minneapolis MN, 55405 United States	Electronic Service		No	24-67
42	Adam	Duininck	aduininck@ncsrcc.org	North Central States Regional Council of Carpenters		700 Olive Street St. Paul MN, 55130 United States	Electronic Service		No	24-67
43	Wally	Dupuis	wallydupuis@fdlband.org	Fond du Lac Band of Lake Superior Chippewa		1720 Big Lake Road Cloquet MN, 55720 United States	Electronic Service		No	24-67
44	Kevin	Dupuis, Sr.	kevindupuis@fdlrez.com			Reservation Business Committee 1720 Big Lake Rd Cloquet MN, 55720 United States	Electronic Service		No	24-67
45	Jamie	Edwards	jamie.edwards@millelacsband.com	Mille Lacs Band of Ojibwe		43408 Oodena Drive Onamia MN, 56358 United States	Electronic Service		No	24-67
46	Michael	Fairbanks	michael.fairbanks@whiteearth-nsn.gov	White Earth Reservation Business Committee		PO Box 418 White Earth MN, 56591 United States	Electronic Service		No	24-67
47	John	Farrell	jfarrell@ilsr.org	Institute for Local Self-Reliance		2720 E. 22nd St Institute for Local Self-Reliance Minneapolis MN, 55406 United States	Electronic Service		No	24-67
48	Sharon	Ferguson	sharon.ferguson@state.mn.us		Department of Commerce	85 7th Place E Ste 280 Saint Paul MN, 55101-2198 United States	Electronic Service		No	24-67
49	Terri	Finn	terri.goggleye@llojibwe.net			null null, null United States	Electronic Service		No	24-67
50	Christine	Fox	cfox@itasca-mantrap.com	Itasca-Mantrap Coop. Electric Assn.		PO Box 192 Park Rapids MN, 56470 United States	Electronic Service		No	24-67
51	Lucas	Franco	lfranco@liunagroc.com	LIUNA		81 Little Canada Rd E Little Canada MN, 55117 United States	Electronic Service		No	24-67
52	Gary	Frazer	gfrazer@mnchippewatribe.org	Minnesota Chippewa		PO Box 217 Cass Lake	Electronic Service		No	24-67

## Schedule E

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
				Tribe		MN, 56633 United States				
53	Stacey	Fujii	sfujii@grenergy.com	Great River Energy		12300 Elm Creek Boulevard Maple Grove MN, 55369-4718 United States	Electronic Service		No	24-67
54	Edward	Garvey	garveyed@aol.com	Residence		32 Lawton St Saint Paul MN, 55102 United States	Electronic Service		No	24-67
55	Shannon	Geshick	shannon.geshick@state.mn.us	Minnesota Indian Affairs Council (MIAC)		null null, null United States	Electronic Service		No	24-67
56	Allen	Gleckner	gleckner@fresh-energy.org	Fresh Energy		408 St. Peter Street Ste 350 Saint Paul MN, 55102 United States	Electronic Service		No	24-67
57	Jeffrey	Haase	jhaase@grenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	24-67
58	Hal	Halpern	halhalpern@clpower.com	Cooperative Light & Power		1554 Hwy 2 PO Box 69 Two Harbors MN, 55616 United States	Electronic Service		No	24-67
59	Jeremy	Hamilton	jhamilton@uppersiouxcommunity-nsn.gov	Upper Sioux Community		Upper Sioux Community PO Box 147 Granite Falls MN, 56241 United States	Electronic Service		No	24-67
60	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	24-67
61	Amy	Hastings	amyh@uppersiouxcommunity-nsn.gov	Upper Sioux Community		5722 Travers Lane PO Box 147 Granite Falls MN, 56241 United States	Electronic Service		No	24-67
62	Erik	Hatlestad	erik@cureliver.org			117 1st St Montevideo MN, 56265 United States	Electronic Service		No	24-67
63	Adam	Heinen	aheinen@dakotaelectric.com	Dakota Electric Association		4300 220th St W Farmington MN, 55024 United States	Electronic Service		No	24-67
64	Kristin	Henry	kristin.henry@sierraclub.org	Sierra Club		2101 Webster St Ste 1300 Oakland CA, 94612 United States	Electronic Service		No	24-67
65	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	24-67
66	Ronald	Horman	rhorman@redwoodelectric.com	Redwood Electric Cooperative		60 Pine Street Clements	Electronic Service		No	24-67

## Schedule E

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						MN, 56224 United States				
67	Robbie	Howe	robbie.howe@llojibwe.net	Leech Lake Band of Ojibwe		190 Sailstar Drive NW Cass Lake MN, 56633 United States	Electronic Service		No	24-67
68	John	lhle	ljihle@rrt.net	PlainStates Energy LLC		27451 S Hwy 34 Barnesville MN, 56514 United States	Electronic Service		No	24-67
69	Annie	Jackson	cheryl.jackson@whiteearth-nsn.gov	White Earth Nation		White Earth Tribal Headquarters 35500 Eagle View Road Ogemo MN, 56569 United States	Electronic Service		No	24-67
70	Faron	Jackson, Sr.	faron.jackson@llojibwe.net			190 Sailstar Drive NW Cass Lake MN, 56633 United States	Electronic Service		No	24-67
71	Justin	Jahnz	justin.jahnz@ecemn.com	East Central Energy		412 Main Ave N Braham MN, 55006 United States	Electronic Service		No	24-67
72	Alan	Jenkins	aj@jenkinsatlaw.com	Jenkins at Law		2950 Yellowtail Ave. Marathon FL, 33050 United States	Electronic Service		No	24-67
73	Kevin	Jensvold	kevinj@uppersiouxcommunity-nsn.gov	Upper Sioux Community		PO Box 147 Granite Falls MN, 56241-0147 United States	Electronic Service		No	24-67
74	Annette	Johnson	annette.johnson@redlakenation.org	Red Lake Nation		15484 Migizi Drive Red Lake MN, 56671 United States	Electronic Service		No	24-67
75	Jody	Johnson	jody.johnson@piic.org	Prairie Island Indian Community		5636 Sturgeon Lake Rd Welch MN, 55089 United States	Electronic Service		No	24-67
76	Richard	Johnson	rick.johnson@lawmoss.com	Moss & Barnett		150 S. 5th Street Suite 1200 Minneapolis MN, 55402 United States	Electronic Service		No	24-67
77	Sarah	Johnson Phillips	sjphillips@stoel.com	Stoel Rives LLP		33 South Sixth Street Suite 4200 Minneapolis MN, 55402 United States	Electronic Service		No	24-67
78	Mark	Kaminski	mark.kaminski@gsa.gov	General Services Administration		1800 F Street NW Washington DC, 20405 United States	Electronic Service		No	24-67
79	Veda	Kanitz	vmkanitz@gmail.com			null null, null United States	Electronic Service		No	24-67
80	Jenny	Kartes	jkartes@arrowhead.coop	Arrowhead Electric		PO Box 39 5401 W Hwy 61	Electronic Service		No	24-67

## Schedule E

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
				Cooperative, Inc.(P)		Lutsen MN, 55612 United States				
81	David	Kempf	dkempf@greenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	24-67
82	William	Kenworthy	will@votesolar.org			1 South Dearborn St Ste 2000 Chicago IL, 60603 United States	Electronic Service		No	24-67
83	Bobby	King	bking@solarunitedneighbors.org	Solar United Neighbors		3140 43rd Ave S Minneapolis MN, 55406 United States	Electronic Service		No	24-67
84	Therese	LaCanne	tlacanne@greenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	24-67
85	Matthew	Lacey	mlacey@greenergy.com	Great River Energy		12300 Elm Creek Boulevard Maple Grove MN, 55369-4718 United States	Electronic Service		No	24-67
86	Arthur	LaRose	arthur.larose@llojibwe.net	Leech Lake Band of Ojibwe		190 Sailstar Drive NW Cass Lake MN, 56633 United States	Electronic Service		No	24-67
87	Robert L	Larsen	robert.larsen@lowersioux.com	Lower Sioux Indian Community		PO Box 308 39527 Reservation Highway 1 Morton MN, 56270 United States	Electronic Service		No	24-67
88	Mark	Larson	mlarson@meeker.coop	Meeker Coop Light & Power Assn		1725 Highway 12 E Ste 100 Litchfield MN, 55355 United States	Electronic Service		No	24-67
89	Michelle	Larson	michelle@redwingchamber.com	Red Wing Area Chamber of Commerce		439 Main Street Red Wing, MN Bay Point Park MN, 55066 United States	Electronic Service		No	24-67
90	Peder	Larson	plarson@larkinhoffman.com	Larkin Hoffman Daly & Lindgren, Ltd.		8300 Norman Center Drive Suite 1000 Bloomington MN, 55437 United States	Electronic Service		No	24-67
91	Dan	Leshner	dlesher@greenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	24-67
92	Michelle	Lommel	mlommel@greenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	24-67
93	Kavita	Maini	kmainsi@wi.rr.com	KM Energy Consulting, LLC		961 N Lost Woods Rd Oconomowoc	Electronic Service		No	24-67

## Schedule E

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

## Schedule E

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

## Schedule E

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
119	Marsha	Parlow	mparlow@grenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	24-67
120	Priti	Patel	ppatel@grenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369-4718 United States	Electronic Service		No	24-67
121	Earl	Pendleton	earl.pendleton@lowersioux.com	Lower Sioux Indian Community		39527 Highway 1 Morton MN, 56270 United States	Electronic Service		No	24-67
122	Gordon	Pietsch	gpietsch@grenergy.com	Great River Energy		12300 Elm Creek Blvd. Maple Grove MN, 55369-4718 United States	Electronic Service		No	24-67
123	Joe	Plumer	joe.plumer@redlakenation.org	Red Lake Nation		15484 Migizi Drive Red Lake MN, 56671 United States	Electronic Service		No	24-67
124	Kevin	Pranis	kpranis@liunagroc.com	Laborers' District Council of MN and ND		81 E Little Canada Road St. Paul MN, 55117 United States	Electronic Service		No	24-67
125	Robert	Prescott	bob.prescott@lowersioux.com	Lower Sioux Indian Community		39527 Highway 1 Morton MN, 56270 United States	Electronic Service		No	24-67
126	Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	1400 BRM Tower 445 Minnesota St St. Paul MN, 55101-2131 United States	Electronic Service		Yes	24-67
127	Kevin	Reuther	kreuther@mncenter.org	MN Center for Environmental Advocacy		26 E Exchange St, Ste 206 St. Paul MN, 55101-1667 United States	Electronic Service		No	24-67
128	Stephan	Roos	stephan.roos@state.mn.us		Minnesota Department of Agriculture	625 Robert St N Saint Paul MN, 55155-2538 United States	Electronic Service		No	24-67
129	Alan	Roy	alan.roy@whiteearth-nsn.gov	White Earth Nation		White Earth Tribal Headquarters 35500 Eagle View Road Ogema MN, 56569 United States	Electronic Service		No	24-67
130	Bill	Rudnicki	bill.rudnicki@shakopeedakota.org	Shakopee Mdewakanton Sioux Community		Shakopee Mdewakanton Sioux Community 2330 Sioux Trail NW Prior Lake MN, 55372 United States	Electronic Service		No	24-67
131	Nathaniel	Runke	nrunke@local49.org			611 28th St. NW Rochester	Electronic Service		No	24-67

## Schedule E

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						MN, 55901 United States				
132	Zachary	Ruzycki	zruzycki@grenergy.com	Great River Energy		12300 Elm Creek Boulevard Maple Grove MN, 55369 United States	Electronic Service		No	24-67
133	Miranda	Sam	miranda.sam@lowersioux.com	Lower Sioux Indian Community		39527 Reservation Highway 1 PO Box 308 Morton MN, 56270 United States	Electronic Service		No	24-67
134	Adam	Savariego	adams@uppersiouxcommunity-nsn.gov	Upper Sioux Community		5722 Travers Lane PO Box 147 Granite Falls MN, 56241 United States	Electronic Service		No	24-67
135	Ronald J.	Schwartau	rschwartau@noblesce.com	Nobles Electric Cooperative		22636 U.S. Hwy. 59 Worthington MN, 56187 United States	Electronic Service		No	24-67
136	Jessie	Seim	jessie.seim@piic.org	Prairie Island Indian Community		5636 Sturgeon Lake Rd Welch MN, 55089 United States	Electronic Service		No	24-67
137	Darrell	Seki, Sr.	dseki@redlakenation.org			15484 Migizi Drive Red Lake MN, 56671 United States	Electronic Service		No	24-67
138	Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates		7400 Lyndale Ave S Ste 190 Richfield MN, 55423 United States	Electronic Service		Yes	24-67
139	Joel	Smith	jsmith@mnchippewatribe.org	Minnesota Chippewa Tribe		PO Box 217 Cass Lake MN, 56633 United States	Electronic Service		No	24-67
140	Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.		76 W Kellogg Blvd St. Paul MN, 55102 United States	Electronic Service		No	24-67
141	Nizhoni	Smith	nizhoni.smith@lowersioux.com	Lower Sioux Indian Community		PO Box 308 39527 Reservation Highway 1 Morton MN, 56270 United States	Electronic Service		No	24-67
142	Roger	Smith, Sr.	rogermsmithsr@fdlrez.com			1720 Big Lake Road Cloquet MN, 55720 United States	Electronic Service		No	24-67
143	Beth	Soholt	bsoholt@cleangridalliance.org	Clean Grid Alliance		570 Asbury Street Suite 201 St. Paul MN, 55104 United States	Electronic Service		No	24-67
144	Marie	Spry	mariespry@grandportage.com			PO Box 428 Grand Portage MN, 55605 United States	Electronic Service		No	24-67

## Schedule E

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
145	Michael	Stalberger	michael.stalberger@blueearthcountymn.gov	Blue Earth County		410 S 5th Street Mankato MN, 56001 United States	Electronic Service		No	24-67
146	LeRoy	Staples Fairbanks III	leroy.fairbanks@llojbwe.net	Leech Lake Band of Ojibwe		190 Sailstar Drive NW Cass Lake MN, 56633 United States	Electronic Service		No	24-67
147	Byron E.	Starns	byron.starns@stinson.com	STINSON LLP		50 S 6th St Ste 2600 Minneapolis MN, 55402 United States	Electronic Service		No	24-67
148	Mark	Strohfus	mstrohfus@grenergy.com	Great River Energy		12300 Elm Creek Boulevard Maple Grove MN, 55369-4718 United States	Electronic Service		No	24-67
149	James M	Strommen	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered		150 S 5th St Ste 700 Minneapolis MN, 55402 United States	Electronic Service		No	24-67
150	Samuel	Strong	sam.strong@redlakenation.org	Red Lake Nation		15484 Migizi Drive Red Lake MN, 56671 United States	Electronic Service		No	24-67
151	Timothy	Sullivan	tsullivan@whe.org	Wright Hennepin Coop. Electric Assn.		6800 Electric Drive PO Box 330 Rockford MN, 55373 United States	Electronic Service		No	24-67
152	David	Sunderman	daves@benco.org	BENCO (DUPLICATE)		PO Box 8 Mankato MN, 56002-0008 United States	Electronic Service		No	24-67
153	Camille	Tanhoff	kamip@upperSiouxcommunity-nsn.gov	Upper Sioux Community		5722 Travers Lane PO BOX 147 Granite Falls MN, 56241 United States	Electronic Service		No	24-67
154	Tim	Thompson	tthompson@lrec.coop	Lake Region Electric Cooperative		PO Box 643 1401 South Broadway Pelican Rapids MN, 56572 United States	Electronic Service		No	24-67
155	Geoffrey	Tolley	geoff.tolley@gmail.com			855 Stanley Road Two Harbors MN, 55616-1176 United States	Electronic Service		No	24-67
156	Caralyn	Trutna	carrie@upperSiouxcommunity-nsn.gov	Upper Sioux Community		Upper Sioux Community P.O. Box 147 Granite Falls MN, 55372 United States	Electronic Service		No	24-67
157	Jackie	Van Norman	jvannorman@grenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	24-67
158	Sam	Villella	sdvillella@gmail.com			10534 Alamo Street NE Blaine MN,	Electronic Service		No	24-67

## Schedule E

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						55449 United States				
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	24-67
160	Amelia	Vohs	avohs@mncenter.org	Minnesota Center for Environmental Advocacy		1919 University Avenue West Suite 515 St. Paul MN, 55104 United States	Electronic Service		No	24-67
161	Trent	Waite	twaite@grenergy.com			null null, null United States	Electronic Service		No	24-67
162	Heather	Westra	heather.westra@piic.org	Prairie Island Indian Community		5636 Sturgeon Lake Rd Welch MN, 55089 United States	Electronic Service		No	24-67
163	Steve	White	steve.white@llojibwe.net	Leech Lake Band of Ojibwe		190 Sailstar Drive NW Cass Lake MN, 56633 United States	Electronic Service		No	24-67
164	Cody	Whitebear	cody.whitebear@piic.org	Prairie Island Indian Community		5636 Sturgeon Lake Road Welch MN, 55089 United States	Electronic Service		No	24-67
165	John	Williams	jwilliams@grenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	24-67
166	Virgil	Wind	virgil.wind@millelacsband.com	Mille Lacs Band of Ojibwe		43408 Oodena Drive Onamia MN, 56359 United States	Electronic Service		No	24-67
167	Joseph	Windler	jwindler@winthrop.com	Winthrop & Weinstine		225 South Sixth Street, Suite 3500 Minneapolis MN, 55402 United States	Electronic Service		No	24-67
168	Laurie	York	laurie.york@whiteearth-nsn.gov	White Earth Reservation Business Committee		PO Box 418 White Earth MN, 56591 United States	Electronic Service		No	24-67
169	Curtis	Zaun	czaun@mnseia.org	MnSEIA		PO Box 8141 Saint Paul MN, 55108 United States	Electronic Service		No	24-67
170	Kurt	Zimmerman	kwz@ibew160.org	Local Union #160, IBEW		2909 Anthony Ln St Anthony Village MN, 55418-3238 United States	Electronic Service		No	24-67
171	Patrick	Zomer	pat.zomer@lawmoss.com	Moss & Barnett PA		150 S 5th St #1200 Minneapolis MN, 55402 United States	Electronic Service		No	24-67

**Minnesota Wetland Conservation Act**  
**NOTICE OF DECISION**

<b>Date this Notice was sent:</b>	<b>10/21/2025</b>
<b>Local Government Unit:</b>	<b>Olmsted County/SWCD</b>
<b>County:</b>	<b>Olmsted</b>
<b>Applicant and (if applicable) Applicant's Representative:</b>	<b>Crane Energy Storage LLC. and Sandhill Energy Storage LLC Kyle Hanson – Merjent, Inc.</b>
<b>Project Name/Number:</b>	<b>14-25</b>
<b>Type of Decision (check all that apply):</b> <b>Note:</b> Boundary/type, sequencing, replacement plan, and bank plan decisions require an associated notice of application prior to the decision being made.	<input checked="" type="checkbox"/> Boundary/Type <input type="checkbox"/> Sequencing (submitted separately from a replacement plan) <input type="checkbox"/> Replacement Plan <input type="checkbox"/> Bank Plan <input type="checkbox"/> Exemption Identify which exemption by Rule or Statute Citation: <input checked="" type="checkbox"/> No-Loss Identify which provision by Rule or Statute Citation: <b>WCA 8420.0415 Subp.A: no proposed impact to wetlands</b>
<b>Decision:</b> <b>Note:</b> All replacement plan approvals are conditional upon confirmation from BWSR of withdrawal of specified credits and/or financial assurance received for project-specific replacement.	<input type="checkbox"/> Denied <input checked="" type="checkbox"/> Approved. Valid for <input checked="" type="checkbox"/> 5 yrs (default); <input type="checkbox"/> Other. Specify: <input type="checkbox"/> Approved with Conditions List Conditions: Valid for <input type="checkbox"/> 5 yrs (default); <input type="checkbox"/> Other. Specify:
<b>LGU Representative Name &amp; Signature:</b>	<b>Skip Langer</b> <i>Skip Langer</i> 10/22/2025   12:35 PM CDT

### Decision Timeline

An LGU must approve or deny a request within 60 days of receiving a complete application per MINN. STAT. § 15.99.

<b>Date Complete Application Received:</b>	<b>8/15/25 original &amp; 10/09/2025 revised appl memo</b>
<b>Date of Decision:</b>	<b>10/21/2025</b>
<b>If applicable, date of <i>written extension</i> to 60-day decision timeline &amp; number of days extended:</b> <b>Reason for Extension (check one):</b>	<input type="checkbox"/> Other process or decision required to occur before WCA decision. Describe: <input type="checkbox"/> Additional information and/or revision to application submitted. <input type="checkbox"/> Applicant request. <input type="checkbox"/> Other. Describe:

Date & number of days extended for any <i>additional written extensions</i> agreed to by the applicant:	
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**Decision Summary**

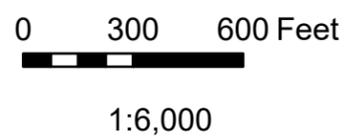
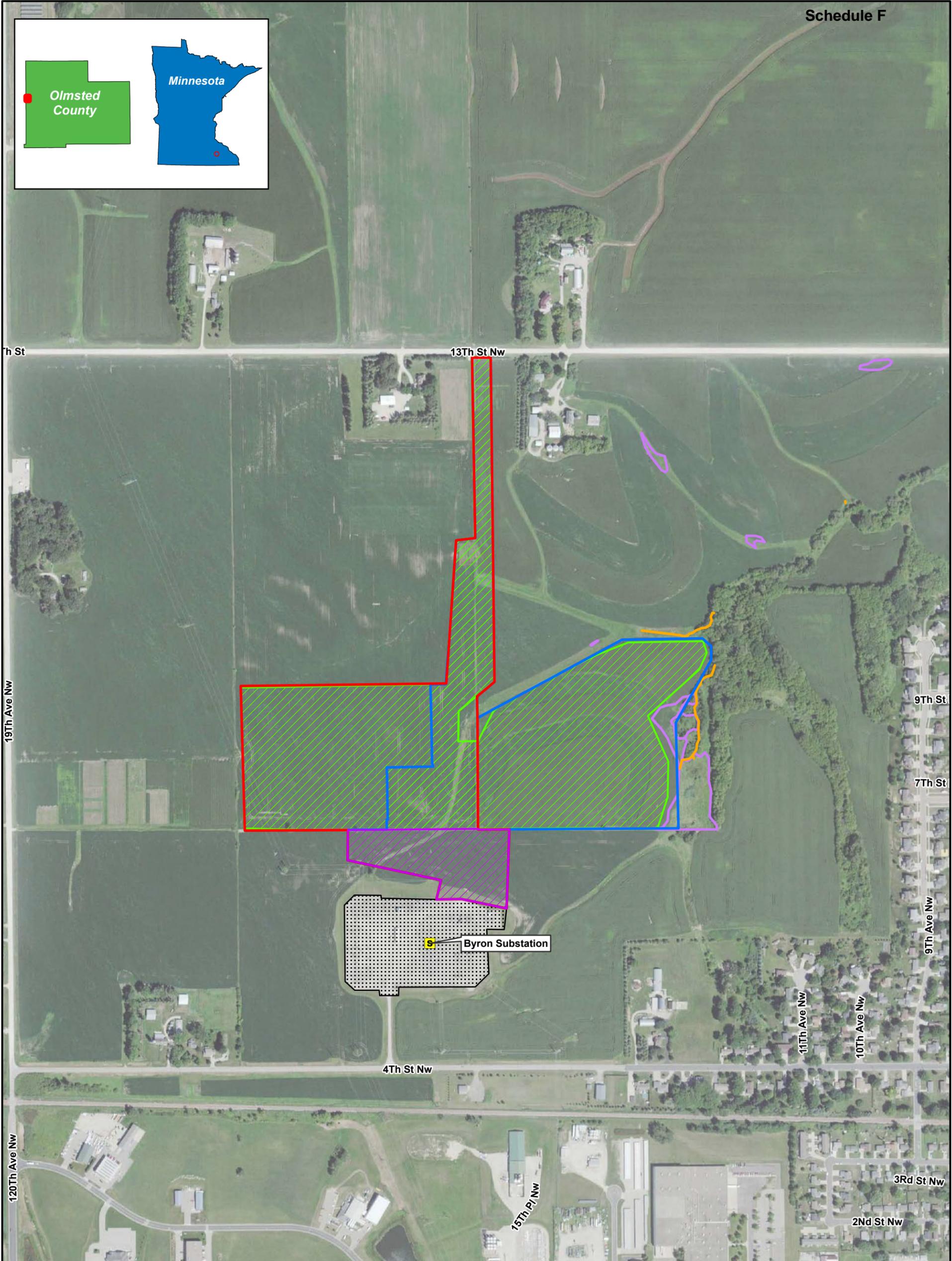
<b>Technical Evaluation Panel Recommendation (check one):</b>	<input type="checkbox"/> No recommendation <input checked="" type="checkbox"/> Approval or approval with conditions (attach recommendation) <input type="checkbox"/> Denial (attach recommendation)
<b>LGU Findings (check all that apply):</b>	<input type="checkbox"/> Findings attached <input checked="" type="checkbox"/> Findings: <b>The Technical Evaluation Panel (TEP) visited the site to evaluate the wetland delineation on September 11, 2025. During this site visit inaccuracies were identified with the previous delineation. Changes were discussed as wetland boundaries were reviewed in the field and it was agreed that a revised delineation memo would serve to summarize the changes to the overall delineation report. Merjent has completed the revisions in the attached memo and mapped the approved revised boundaries.</b>  <b>Based on the footprint of the future BESS project as provided, the project as designed will result in no impact to wetland and qualifies as a No Loss under WCA 8420.0415.subp. A – No wetland will be impacted during this project.</b>  <b>If changes to the current BESS layout plan occur and wetlands may be impacted, the LGU should be contacted and revised plans provided for review and comments.</b>  <input type="checkbox"/> Other attachments. Specify:
<b>For Replacement Plan Decisions Only:</b>	Total wetland impacts requiring replacement (acres): Type of wetland replacement (check all that apply): <input type="checkbox"/> Project-Specific. Number of Credits: <input type="checkbox"/> Banking. Number of Credits by Bank Account #:

**Notice Distribution**

<b>Notice Recipients (check all that apply):</b>	<input checked="" type="checkbox"/> SWCD TEP Member (if different from LGU): <b>Angela White</b> <input checked="" type="checkbox"/> BWSR TEP Member: <b>Jed Chesnut-wetland specialist</b> <input checked="" type="checkbox"/> DNR Representative: <b>Nicole Lehman-DNR Hydrologist</b> <input type="checkbox"/> Watershed District or WMO (if applicable): <input type="checkbox"/> <a href="mailto:bank.administrator.bwsr@state.mn.us">bank.administrator.bwsr@state.mn.us</a> (Bank Plan Decisions Only) <input checked="" type="checkbox"/> Applicant: <b>Crane Energy Storage LLC &amp; Sandhill Energy Storage LLC</b> <input checked="" type="checkbox"/> Applicant’s Representative (if applicable): <b>Merjent-Kyle Hanson</b> <input type="checkbox"/> Members of the Public Requesting Notices (if applicable): <input checked="" type="checkbox"/> Others: <b>ACOE</b>
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Appeal Process

<p><b>Appeal Process (check one):</b></p>	<p><input checked="" type="checkbox"/> Local Appeal Process. <b>To appeal an LGU staff decision, please send petition and \$411.00 fee payable to: Olmsted County to: Olmsted SWCD 1188 50th Street SE Rochester, MN 55904</b></p> <p><input type="checkbox"/> Board of Water &amp; Soil Resources (see instructions below)</p>
<p><b>If there is no established Local Appeal Process indicated above, an appeal of this decision may be made to BWSR per the instructions to the right.</b></p> <p><b>Note:</b> Decisions are not final until the 30-day appeal window ends.</p>	<p>Mail or email written request to appeal sent to BWSR within 30 days of date this notice was sent. Include copy of this notice, name and contact information of appellant(s) and their representative(s) (if applicable), a statement clarifying intent to appeal, and supporting information as to why the decision is in error.</p> <p>Mail check payable to MN Board of Water &amp; Soil Resources for \$500.</p> <p>Send to:</p> <p style="padding-left: 40px;">Appeals &amp; Regulatory Compliance Coordinator Minnesota Board of Water &amp; Soil Resources 520 Lafayette Road North St. Paul, MN 55155 <a href="mailto:travis.germundson@state.mn.us">travis.germundson@state.mn.us</a>.</p>



### Final Delineated Wetland & Waterways Boundary Map Crane & Sandhill BESS Projects Olmsted County, MN

- Existing Substation
- Crane Land Control Area
- Sandhill Land Control Area
- Preliminary Development Areas
- Gen-Tie Development Area
- Byron Substation
- Delineated Wetland
- Delineated Waterbody Line

Imagery: MNGeo 2021 Color FSA  
Sources: Tenaska, Inc., MN Geospatial Commons, MDNR, ESRI

**In the Matter of the Application of Crane Energy Storage LLC for a Site Permit for the up to 200 MW Crane Energy Storage Project in Olmsted County, Minnesota**

MPUC Docket No. IP-7148/ESS-24-406

**In the Matter of the Application of Sandhill Energy Storage LLC for a Site Permit for the up to 200 MW Sandhill Energy Storage Project in Olmsted County, Minnesota**

MPUC Docket No. IP-7149/ESS-24-407

### **CERTIFICATE OF SERVICE**

Breann L. Jurek certifies that on the 25th day of November 2025, she e-filed a true and correct copy of the Pre-Filed Direct Testimony of James Hingston, with Schedules A-F, on behalf of Crane Energy Storage LLC and Sandhill Energy Storage LLC via eDockets ([www.edockets.state.mn.us](http://www.edockets.state.mn.us)):

Said documents were also served on the Official Service Lists of record on file with the Minnesota Public Utilities Commission and as attached hereto.

Executed on: November 25, 2025

*Signed: /s/ Breann L. Jurek*

\_\_\_\_\_  
Fredrikson & Byron, P.A.

60 South Sixth Street, Suite 1500

Minneapolis, MN 55402

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
1	Leakhena	Au	lau@fredlaw.com	Fredrikson & Byron, P.A.		60 South Sixth Street, Suite 1500 Minneapolis MN, 55402 United States	Electronic Service		No	ESS-24-406
2	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	ESS-24-406
3	Monika	Davis	monika.davis@merjent.com			1 Main Street Suite 300 Minneapolis MN, 55414 United States	Electronic Service		No	ESS-24-406
4	Jeremy	Duehr	jduehr@fredlaw.com	Fredrikson & Byron, P.A.		60 S Sixth St Ste 1500 Minneapolis MN, 55402-4400 United States	Electronic Service		No	ESS-24-406
5	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	ESS-24-406
6	Joseph	Finocchiaro	jfinocchiaro@tenaska.com	Sparrow Energy Storage LLC		412 W 15th Street, Fl 15 New York NY, 10011 United States	Electronic Service		No	ESS-24-406
7	Breann	Jurek	bjurek@fredlaw.com	Fredrikson & Byron PA		60 S Sixth St Ste 1500 Minneapolis MN, 55402 United States	Electronic Service		No	ESS-24-406
8	Shantal	Pai	spai@fredlaw.com	Fredrikson and Byron, P.A.		60 South Sixth Street Suite 1500 Minneapolis MN, 55402 United States	Electronic Service		No	ESS-24-406
9	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	ESS-24-406
10	Will	Seuffert	will.seuffert@state.mn.us		Public Utilities Commission	121 7th Pl E Ste 350 Saint Paul MN, 55101 United States	Electronic Service		Yes	ESS-24-406

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
1	Leakhena	Au	lau@fredlaw.com	Fredrikson & Byron, P.A.		60 South Sixth Street, Suite 1500 Minneapolis MN, 55402 United States	Electronic Service		No	ESS-24-407
2	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	ESS-24-407
3	Monika	Davis	monika.davis@merjent.com			1 Main Street Suite 300 Minneapolis MN, 55414 United States	Electronic Service		No	ESS-24-407
4	Jeremy	Duehr	jduehr@fredlaw.com	Fredrikson & Byron, P.A.		60 S Sixth St Ste 1500 Minneapolis MN, 55402-4400 United States	Electronic Service		No	ESS-24-407
5	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	ESS-24-407
6	Joseph	Finocchiaro	jfinocchiaro@tenaska.com	Sparrow Energy Storage LLC		412 W 15th Street, Fl 15 New York NY, 10011 United States	Electronic Service		No	ESS-24-407
7	Breann	Jurek	bjurek@fredlaw.com	Fredrikson & Byron PA		60 S Sixth St Ste 1500 Minneapolis MN, 55402 United States	Electronic Service		No	ESS-24-407
8	Shantal	Pai	spai@fredlaw.com	Fredrikson and Byron, P.A.		60 South Sixth Street Suite 1500 Minneapolis MN, 55402 United States	Electronic Service		No	ESS-24-407
9	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	ESS-24-407
10	Will	Seuffert	will.seuffert@state.mn.us		Public Utilities Commission	121 7th Pl E Ste 350 Saint Paul MN, 55101 United States	Electronic Service		Yes	ESS-24-407