

January 22, 2025

VIA E-FILING

Will Seuffert
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101-2147

Re: *In the Matter of the Application of Minnesota Power and Great River Energy for a Certificate of Need and Route Permit for the Northland Reliability Project 345 kV Transmission Line*
MPUC Docket Nos. E015,ET2/CN-22-416; E015,ET2/TL-22-415
Response to January 2025 Comments and Decision Options Filed January 21, 2025

Dear Mr. Seuffert:

Via this letter, Minnesota Power and Great River Energy (collectively, the “Applicants”) provide responses to comments filed in the above-referenced dockets and decision options filed by Commissioner Tuma on January 21, 2025.

Response to January 2025 Comments

On December 23, 2024, the Minnesota Public Utilities Commission (“Commission”) issued a Request for Comments on certain topics related to the Northland Reliability 345 kV Transmission Line Project (“Project”). Initial comments were due January 10, 2025, and reply comments were due January 17, 2025. The “Applicants filed initial comments on January 10, 2025 (“Applicants’ Initial Comments”). Between January 10 and January 17, 2025, multiple comments were received from landowners in the Cole Lake Riverton Region. At the time of filing the Applicants’ Initial Comments, the Applicants requested the opportunity to respond to any other comments filed in response to the Commission’s Request for Comments. The following provides the Applicants’ response to other comments filed by January 17, 2025.

As an initial matter, the Applicants remind the Commission that they have been meeting with and gathering comments from landowners and stakeholders throughout the Project area for over two years, well in advance of filing the Combined Application for a Certificate of Need and Route Permit (“Combined Application”) on August 4, 2023. Prior to filing the Combined Application, this outreach included multiple preapplication open houses, letters, individual landowner conversations, and meetings with local units of government, state agencies, federal agencies, and Minnesota Tribal Nations. After filing the Combined Application, the Applicants continued meetings with local units of government, state agencies, federal agencies, and Minnesota Tribal Nations. The Applicants also participated in all public meetings and public hearings organized by the Commission and the Department of Commerce, Energy Environmental Review and Analysis and reviewed

every comment that has been filed in the Project docket. The Applicants have taken every aspect of this process seriously and with sincere appreciation for those that have chosen to participate.

The Applicants acknowledge that not everyone will be satisfied with the outcome of the process, but that the goal of these robust Certificate of Need and Route Permit processes is to make the most reasoned decision that is consistent with Minnesota's need and routing criteria while ensuring that the permitted Project is constructible and can be constructed consistent with all safety, reliability, operational codes and standards, and good utility practice. Thus, based on their fulsome review of the record, the Applicants continue to believe that the Project need has been demonstrated sufficiently for the Commission to issue a Certificate of Need and that the Commission should issue a Route Permit for either the Co-location Maximization Route or the Modified Proposed Route (as further modified by decision option 6(d)(xvi) or 7(d)(xv)), as both satisfy the state routing criteria.

The Applicants provide responses to the following comments filed during the comment period outlined in the Commission's Request for Comment:

- Don and Marie Boucher
- Patrine Turnbloom
- Marilyn Jedinak
- Tim and Sue Sasse
- Mary and Rodger Spolarich
- Little Rabbit Lake Commenters ("LRL")

Don and Marie Boucher filed comments related to the location of the Project near Cole Lake Way.¹ Specifically, they opposed the Proposed Route included in the Application and alignment alternative AA6. They wrote in support of the Co-location Maximization Route (incorporating alignment alternative AA3) as it limits the need for new rights-of-way by co-locating the Project with existing transmission line rights-of-way in this area. Don and Marie Boucher posed two of their own questions and the Applicants provide the following responses.

- 1) If Co-location Maximization Route is approved, is the new 3,000 foot right-of-way as requested still necessary? If so, why?

The route width for the Co-location Maximization Route is 1,000 feet wide. The Modified Proposed Route is 3,000 feet wide. Regardless of which route is selected by the Commission, the right-of-way for the Project will be 150 feet to be located within the approved route width.

¹ Comment by Don and Marie Boucher (Jan. 5, 2025) (eDocket No. [20251-213809-01](#)).

- 2) If Applicant can support consolidating lines in other areas because of residential opposition, why can't the Applicant also support consolidating lines in the Cole Lake Way area?

The Applicants developed several route alternatives that incorporated additional co-location opportunities in response to a request from the Commission in October 2023. The Applicants have developed the Modified Proposed Route and the Co-location Maximization Route as full end-to-end routes that satisfy the state routing criteria. The Co-location Maximization Route includes consolidating lines in the Cole Lake Way area and would cost approximately \$150 million to \$200 million more to construct than the Modified Proposed Route. The Applicants have not advocated for either one of these routes over the other, but have presented both routes for the Commission's consideration.

Patrine Turnbloom provided written comments in support of route alternative E4 and route alternative E5.² The comment encouraged use of these route alternatives because of the "existing lines" and the "additional grasslands will marry up nicely with the existing habitat under the lines." The Applicants note that not all of route alternatives E4 and E5 are grasslands, with much of the southern portion of these route alternatives crossing wooded areas and the Mississippi River--twice. When given the options of all the alternatives presented in this area, the Minnesota Department of Natural Resources stated its preference for route alternative E1.³

Marilyn Jedinak, Tim and Sue Sasse, and Mary and Roger Sporlach each provided written comments opposing route alternative E4 and route alternative E5.⁴ Each stated unique reasons for their opposition, but the comments generally stated concerns with environmental impacts, the cost of the use of these route alternatives, and the proximity to homes. The Applicants have previously stated their opposition to route alternative E4 and route alternative E5, requesting that the Commission grant a Route Permit for the Co-location Maximization Route (incorporating route alternative E1 in this area) or the Modified Proposed Route.⁵

On January 17, 2025, LRL filed 83 pages of comments and exhibits ("LRL January 17 Filing").⁶ Much of the material in the LRL January 17 Filing has been addressed in the Applicants' September 19, 2024 Response to Public Hearing Comments.⁷ The comments

² Comment by Patrine Turnbloom (Jan. 17, 2025) (eDocket No. [20251-214133-01](#)).

³ MnDNR Exceptions to the ALJ Report at 1 (Nov. 25, 2025) (eDocket No. [202411-212366-01](#)).

⁴ Comment by Marilyn Jedinak (Jan. 13, 2025) (eDocket No. [20251-214187-01](#)); Comment by Tim and Sue Sasse (Jan. 16, 2025) (eDocket No. [20251-214087-01](#)); Comment by Mary and Roger Sporlach (Jan. 14, 2025) (eDocket No. [20251-214073-01](#)).

⁵ Applicants' September 19, 2024 Response to Public Hearing Comments at Attachment C (Sept. 19, 2024) (eDocket No. [20249-210359-06](#)).

⁶ Comment by LRL (Jan. 17, 2025) (eDocket No. [20251-214133-01](#)).

⁷ Applicants' September 19, 2024 Response to Public Hearing Comments at Attachment E at Appendix 1 (Sept. 19, 2024) (eDocket No. [20249-210359-06](#)).

of LRL have also been documented in findings of fact.⁸ However, LRL has chosen to present the same information in a way that misrepresents prior arguments and obfuscates the facts on the record in this proceeding.⁹ In an effort to refocus the analysis on the facts on the record, the Applicants have provided responses to LRL's various claims and arguments in **Attachment 1**. The "slight variations" discussed by LRL and illustrated in LRL Exhibit C and Exhibit F each introduce new impacts to existing infrastructure or residences that are not addressed by LRL in its comments. For example, the way LRL has drawn the proposed alignments in Exhibit C would place the Project in very close proximity to existing structures in this area. The way LRL has drawn the proposed alignments in Exhibit F would place them too close to, and in some cases directly on top of, existing transmission lines, which would need to be relocated for LRL's conceptual alignment modifications to be feasible. Also in Exhibit C, LRL's alignment does not take into account the already planned and in-process work for the Riverton STATCOM project, as further described in the Applicants' September 19, 2024 Response to Public Hearing Comments and the Direct Testimony of Mr. Winter, which would prevent the siting of the Project through the area south of the Riverton Substation.¹⁰ Based on these and other issues identified by the Applicants in **Attachment 1**, LRL's newly-suggested alignment change is not feasible or practicable.

Commissioner Decision Options

On January 21, 2025, Commissioner Tuma filed two revised decision options: Decision Option 6 and Decision Option 9. The Applicants will address each of these in more detail during the Commission Agenda meeting on January 23, 2025. However, to provide alternative language for consideration, the Applicants have proposed revisions to Tuma Decision Options 6 and 9B as shown in **Attachment 2**. While the Applicants do not prefer revised Decision Option 6, the Applicants have proposed edits for the Commission's consideration. For Decision Option 9B, these revisions align more closely with the process set forth in the Route Permit and prior Commission approvals of final alignment development.

Further, the Applicants are concerned about the situations that may arise if Tuma Decision Option 9B, as originally proposed, is adopted where the alignment is more costly on a dollar basis than purchasing a property. Under this scenario, the Applicants would need to inform a landowner that the Commission has ordered the Applicants to purchase a

⁸ See ALJ Report at 70 (Nov. 8, 2024) (eDocket No. [202411-211670-01](#)).

⁹ For example, LRL goes so far as to equate the Applicants to a "con man," takes statements made by the Applicants at a Crow Wing County Board meeting grossly out of context, and, without basis, concludes a "lack of credibility" on the part of the Applicants.

¹⁰ Applicants' September 19, 2024 Response to Public Hearing Comments at Attachment E at Figure 2 (Sept. 19, 2024) (eDocket No. [20249-210359-06](#)); see also Winter Direct at n.4 (July 8, 2024) (eDocket No. 20247-208392-03) ("The Riverton STATCOM Project was included in the 2023 Minnesota Biennial Transmission Projects Report (Docket No. E999/M-23-91) under tracking number 2021-NE-N21 ("230 kV STATCOM Project"). This project is needed on a basis entirely independent of the Northland Reliability Project, as discussed in the 2023 Biennial Report. Construction of the project is anticipated to take place between 2025-2027.")

property and displace the owners instead of the Applicants implementing a design change that would allow those owners to retain their property. The impact of purchasing a property (and paying legal fees or relocation costs) is more than just a financial calculation for many and Tuma Decision Option 9B makes the evaluation proposed very challenging. Related changes have also been made to Tuma Decision Option 6(d)(xviii).

Finally, the Applicants are not proposing alternative language for Tuma Decision Option 9A. The Applicants will be prepared to discuss their position that Tuma Decision Option 9A should not be adopted during the Commission's meeting. At a high level, however, the Applicants are opposed to this decision option based on their demonstrated history of successfully working with landowners to reach appropriate land rights agreements, Tuma Decision Option 9A would unnecessarily insert additional persons, processes, procedures, and costs into a well-established legal framework resulting in worse outcomes.

Conclusion

The Applicants appreciate the time and attention dedicated to the important proceedings for the Project.

Sincerely,

/s/ Kodi J. Verhalen

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Little Rabbit Lake Landowners' Comment	Applicants' Response
<p>The Applicants' Comments suddenly asserted, months after they first became aware of them, that E4/E5 were "infeasible."¹</p>	<p>As stated in the Applicants' December 1, 2023 response to scoping comments: "Further, Applicants' alternative is based on extensive engineering and technical analysis in response to the Commission's November 15, 2023 Order, and represents <u>the only feasible way</u> to route the Project adjacent to the existing infrastructure in the Riverton area."²</p> <p>As stated in the Applicants' December 8, 2023 response to scoping comments: "Therefore, the EA's consideration of the Applicants' route and alignment alternatives will address the issues identified by members of the public in these areas and <u>the proposals from members of the public do not need to be individually considered in the EA.</u>"³</p>

¹ LRL Comments at 2. LRL also goes so far as to state: "Like a con man's shell game or 'Whack-a-Mole,' the Applicants have employed a confusing number of names to identify their various proposed routes." LRL Comments at 1 at n.2. It is critically important to know that the "Modified Proposed Route" was developed after careful consideration of public comments, the Environmental Assessment's ("EA") development, and analysis of constructability and cost considerations for each equivalent route or alignment alternative proposed during this proceeding. The Modified Proposed Route and the Co-location Maximization Route both take the Proposed Route (from the Application) and incorporate various route and alignment alternatives.

² Applicants' Response to Route Alternatives and Conditions at 5 (December 1, 2023) (eDocket No. [202312-200917-02](#))(emphasis added).

³ Applicants' Response to Route Alternatives and Conditions at 2-3 (December 1, 2023) (eDocket No. [202312-200917-02](#))(emphasis added).

Little Rabbit Lake Landowners' Comment	Applicants' Response
<p>In a further admission of incompetence, the Applicants suddenly claimed that cost estimates included in the EA and their prior representations that the various alternative routes, including E4/E5, were “equivalent in length and cost,” were wrong and inaccurate.⁴</p>	<p>The quoted language could not be located in the Applicants' August 5, 2024 Comments on the EA or any previous comments of the Applicants, as cited by LRL. Instead, as explained by the Applicants in their August 5, 2024 Comments: “The EA included incorrect costs for the alternatives and example full route options summarized in these tables. The Applicants provided this information to EERA in response to a request for information while EERA was developing the EA. An explanation of the errors the Applicants were able to identify that led to these incorrect costs is provided in Attachment 2, along with a table showing the correct costs.”⁵ As noted in Attachment 2 to the Applicants' August 5, 2024 comments, “No cost associated with relocating the Riverton Substation was included in this estimate [for Route Alternatives E4 and E5].”⁶</p>
<p>Since issuance of the ALJ Decision, the Applicants have embarked on a strategy of misinformation, mischaracterization and misleading statements to denigrate the use of E4/E5.⁷</p>	<p>The Applicants have consistently responded to these route alternatives since they were originally proposed during scoping (see quotes from the Applicants' December 2023 letters discussed above). The Applicants have provided additional information to clarify their position throughout this proceeding.</p>

⁴ LRL Comments at 2.

⁵ Applicants' Comments on the EA at 6 (Aug. 5, 2024) (eDocket No. [20248-209266-02](#)). In Attachment 2 to these comments, the Applicants detail the ways in which the EA omitted certain cost information in its comparisons. These corrections were made by EERA in its September 5, 2024 filing.

⁶ Applicants' Comments on the EA at Attachment 2 at 3 (Aug. 5, 2024) (eDocket No. [20248-209266-02](#)).

⁷ LRL Comments at 3.

Little Rabbit Lake Landowners' Comment	Applicants' Response
<p>Indeed, at this stage of these proceedings, one has to ask, if E4/E5 are so infeasible, why did the Applicants' representatives describe them as "really good," "very good," and "great alternatives?"⁸</p>	<p>LRL has inadvertently taken these comments made by the Applicants at a Crow Wing County Board meeting in June of 2024 out of context. Each of these quotes is a small excerpt from a long presentation by the Applicants explaining the route permit process and the environmental review being undertaken by the EERA. Specifically, that the public has "done a really good job" sharing concerns and presenting route alternatives. And, when looking at those route alternatives, "a lot of them are very, very good, and as you can see, they are straight lines that intentionally follow existing infrastructure, so they are great alternatives that people put in a lot of thought and effort into," but in this conversation, the Applicants did not identify any specifically that fell within this assessment. LRL incorrectly attributes these comments specifically to route alternatives E4 and E5.⁹</p>
<p>Among others, the Crow Wing County Board of Commissioners also encouraged approval of E4/E5.¹⁰</p>	<p>LRL mischaracterizes the position of the Crow Wing County Board of Commissioners that is on the record. The Crow Wing County Board of Commissioners provided the following comment in the letter cited by LRL: "Crow Wing County would encourage the use of existing easements and power line corridors to the west of these designated non-motorized trails (E1, E3, E4 & E5)."¹¹ Therefore, despite the way LRL uses the Crow Wing County comment to support route alternatives E4 and E5, the County also encouraged approval of route alternatives E1 or E3.</p>

⁸ LRL Comments at 4.

⁹ See Crow Wing County Board Meeting Recording (starting at minute 26) available at <https://www.youtube.com/watch?v=KB866WNU6ck&t=26m> (June 11, 2024).

¹⁰ LRL Comments at 4 at n.4.

¹¹ Crow Wing County Comments on the EA (Aug. 5, 2024) (eDocket No. [20248-209288-01](#)).

Little Rabbit Lake Landowners' Comment	Applicants' Response
If E4/E5 are so clearly “infeasible,” why did the Applicants fail to realize that when they submitted their EA? ¹²	The EA was produced by EERA, not the Applicants. Also, the Applicants objected to the original inclusion of the route alternatives (Dec 2023 scoping comments) for the explicit reason that the Applicants' Riverton Route Alternative is the only feasible route through the area besides Modified Proposed Route
The [state routing] factors to be considered do <u>not</u> include pure cost considerations. ¹³	Minnesota's routing criteria (Minn. Stat. § 216E.04, subd. 8 (referencing Minn. Stat. § 216E.03, subd. 7) and Minn. R. 7850.4100) establish multiple factors that the Commission must consider when evaluating an application for a Route Permit. One of those factors does state that the Commission shall consider the “costs of constructing” a route. ¹⁴ Therefore, the Applicants provided this information for the various route and alignment alternatives for the Commission's consideration.
[The Applicants] have presented no legitimate arguments to suggest – much less establish – any errors, misunderstandings, wrong findings, or conclusions by the ALJ. ¹⁵	The Applicants submitted detailed comments in response to the EA and the ALJ Report, including specific exceptions to the ALJ's findings which the Commission may use in making its decision. ¹⁶

¹² LRL Comments at 4.

¹³ LRL Comments at 6.

¹⁴ Minn. R. 7850.4100(L).

¹⁵ LRL Comments at 7.

¹⁶ See Applicants' Comments on EA at 1-7 (Aug. 5, 2024) (eDocket No. [20248-209243-01](#)); Applicants' September 19, 2024 Response to Public Hearing Comments at (Sep. 19, 2024) at Attachment D (eDocket No. [20249-201359-01](#)); Applicants' Exceptions to ALJ Report at 2-28 (Nov. 25, 2024) (eDocket No. [202411-212404-01](#)).

Little Rabbit Lake Landowners' Comment	Applicants' Response
<p>Indeed, the Applicants have failed to consider even slight variations of E4/E5 that would eliminate and ameliorate the alleged need for E4/E5 to cross directly over the Riverton Substation.¹⁷</p>	<p>The route alternatives were evaluated in the EA by EERA as presented by the original proposers. The Applicants specifically developed route alternative E1, which is now included in the Co-location Maximization Route, in response to the Commission's October 2023 directive on corridor consolidation and address issues in the area. The Applicants have consistently stated that there are not feasible or better alternatives for accomplishing these goals than route alternative E1.¹⁸ The Applicants' position is based on extensive evaluation of the existing infrastructure and routing constraints in the area, including the infrastructure and constraints in the area of route alternatives E4 and E5. The "slight variations" discussed by LRL and illustrated in LRL Exhibit C and Exhibit F each introduce new impacts to existing infrastructure or residences that are not addressed by LRL in its comments, as discussed below.</p>
<p>The Minnesota Department of Commerce, Energy Environmental Review and Analysis staff disagree with the Applicants' position regarding the Riverton Substation.¹⁹</p>	<p>In its exceptions to the ALJ Report, EERA stated: "EERA staff believes route alternatives E4 and E5 are <u>not</u> the most appropriate routes in the Cole Lake to Riverton Region of the project." Instead, stating that the Co-location Maximization Route "is the most consistent with the Commission's routing criteria in this region."²⁰</p>

¹⁷ LRL Comments at 8.

¹⁸ See Applicants' Response to Route Alternatives and Conditions at 4 (December 1, 2023) (eDocket No. [202312-200917-02](#)); Applicants' Response to Route Alternatives and Conditions at 4-7 (December 8, 2023) (eDocket No. [202312-201101-02](#)).

¹⁹ LRL Comments at 8 *citing* EERA's September 5, 2024 Responses to Comments on the Environmental Assessment at 5 (eDocket No. [20249-2100005-02](#)).

²⁰ EERA's Exceptions to ALJ Report at 2 (Nov. 25, 2024) (eDocket No. [202411-212396-01](#)).

Little Rabbit Lake Landowners' Comment	Applicants' Response
<p>Exhibit B shows property parcel 81240552, owned by Minnesota Power and Light, one of the Applicants. The Riverton Substation is clearly visible in the upper left-hand (north-northwest) corner of the Minnesota Power and Light Parcel. Nearly all of this Applicant-owned property is devoid of buildings.</p> <p>Exhibit C illustrates just one example of a slight movement of E4/E5 that avoids the Riverton Substation, consistent with EERA's conclusion.</p>	<p>EERA's conclusion from September 5, 2024, did not take into account the already planned and in-process work for the Riverton STATCOM project, as further described in the Applicants' September 19, 2024 Response to Public Hearing Comments.²¹ This figure was also provided in the Applicants' January 10, 2025 comments.²² The need for a STATCOM or similar system to replace critical system voltage support historically provided by local baseload generators has been reported by Minnesota Power since its 2021 Integrated Resource Plan (Appendix F), and reported in the MN Biennial Transmission Projects Report in 2023 (MPUC Tracking Number 2021-NE-N21). Therefore, this newly-suggested alignment change is not feasible or practicable.</p> <p>In general, the "slight modifications" to the centerline of route alternatives E4 and E5 illustrated in LRL Exhibit C and Exhibit F each introduce new impacts to existing infrastructure or residences that are not addressed by LRL in its comments. For example, the way LRL has drawn the proposed alignments in Exhibit C would place the Project in very close proximity to existing structures in this area as shown in Appendix 3 to this response. The way LRL drew the proposed alignments in Exhibit F would place them too close to, and in some cases directly on top of, existing transmission lines. For LRL's conceptual alignment modifications to be valid, they would need to account for the relocation or reconfiguration of the existing transmission lines, as the Applicants have done this for the Co-Location Maximization Route.</p>

²¹ Applicants' September 19, 2024 Response to Public Hearing Comments at Attachment E at Figure 2 (Sept. 19, 2024) (eDocket No. [20249-210359-06](#)); *see also* Winter Direct at n.4 (July 8, 2024) (eDocket No. [20247-208392-03](#)) ("The Riverton STATCOM Project was included in the 2023 Minnesota Biennial Transmission Projects Report (Docket No. E999/M-23-91) under tracking number 2021-NE-N21 ("230 kV STATCOM Project"). This project is needed on a basis entirely independent of the Northland Reliability Project, as discussed in the 2023 Biennial Report. Construction of the project is anticipated to take place between 2025-2027.").

²² Applicants' Response to Commission's Request for Comments at Attachment 3 (Jan. 10, 2025) (eDocket No. [20251-213840-01](#)).

Little Rabbit Lake Landowners' Comment	Applicants' Response
<p>The E4/E5 routes then proceed across the Mississippi River <u>using the existing river crossings and rights of way</u>.²³ . . . <u>But E4/E5 follow the existing powerline rights of way that already cross the Mississippi River twice</u>. The Applicants conspicuously fail to acknowledge this fact. No additional or different river crossings are required, contrary to the alleged concerns of the Applicants.²⁴</p>	<p>Route alternatives E4 and E5 each cross the Mississippi River twice and must be done <u>adjacent to</u> locations where existing 115 kV and 230 kV transmission lines cross the Mississippi River.²⁵ This would result in widening the existing right-of-way at the Mississippi River crossings by at least 110 feet and placing eight additional wires over the Mississippi River in both locations. The Modified Proposed Route and Co-location Maximization Route both avoid these additional Mississippi River crossings (widening rights-of-way over the Mississippi River, Section 10 Corps water crossings, and MnDNR public waters).</p> <p>As the MnDNR stated in its own exceptions to the ALJ Report, when evaluating all alternatives in the Cole Lake Riverton Region, including the Modified Proposed Route, the Co-location Maximization Route (including route alternative E1), and the other E route alternatives (E2, E3, E4, and E5): <u>“E1 is the favorable route for DNR in the Cole Lake Riverton Region, as consolidating infrastructure and reducing the amount of new ROW is favorable to DNR.”</u>²⁶</p>
<p>If the Applicants had spent even a few minutes looking at the relevant maps, they would have quickly seen that a minor modification in E4/E5 would eliminate any need to move the Riverton Substation.²⁷</p>	<p>The Applicants spent considerable time evaluating route alternatives in the Riverton area, including route alternative E4 or route alternative E5, but as discussed in detail in the Applicants' September 19, 2024 Response to Public Hearing Comments, and addressed in subsequent filings by the Applicants, there was not a feasible solution.²⁸</p>

²³ LRL Comments at 9.

²⁴ LRL Comments at 10.

²⁵ While LRL comments that “The Applicants conspicuously fail to acknowledge this fact” (LRL Comments at 10), that is simply not true. The locations of existing 115 kV and 230 kV transmission lines are shown on various maps in this proceeding and the Applicants have included these existing lines in maps they have provided to the Commission.

²⁶ MnDNR Exceptions to the ALJ Report at 18 (Nov. 25, 2024) (eDocket No. [202411-212371-01](#)) (emphasis added).

²⁷ LRL Comments at 9.

²⁸ Applicants' September 19, 2024 Response to Public Hearing Comments at Attachment E at 15-17 (Sept. 19, 2024) (eDocket No. [20249-210359-06](#)).

Little Rabbit Lake Landowners' Comment	Applicants' Response
<p>Moreover, E4/E5 is better than either the MPR or CLMR in terms of crossing protected or impaired waterways.²⁹</p>	<p>While this may be the opinion of LRL, the resource agency responsible for these waterways does not agree that route alternatives E4 and E5 are preferred in this area. As the MnDNR stated in its own exceptions to the ALJ Report, when evaluating all alternatives in the Cole Lake Riverton Region, including the Modified Proposed Route, the Co-location Maximization Route (including route alternative E1), and the other E route alternatives (E2, E3, E4, and E5): “<u>E1 is the favorable route for DNR in the Cole Lake Riverton Region</u>, as consolidating infrastructure and reducing the amount of new ROW is favorable to DNR. The E1 alternative reduces the number of wetlands impacted, forested wetlands, water crossings, and a significant decrease in overall forested landcover through this area. There is a reduction in MBS Sites and NPCs Spanning any high-quality habitats and lakes of high and outstanding biodiversity significance in this area would be preferred.”³⁰</p>
<p>The [Modified Proposed Route] would cross Snowshoe Mine Pit Lake, a State-designated trout lake with DNR water access; bisect Rowe Mine Pit Lake and Carlson Pit Lake; cross over a protected stream from Little Blackhoof Lake to Little Rabbit Lake; and run through protected wetlands and the Rabbit River east and northeast of Little Rabbit Lake.³¹</p>	<p>The identified waterbodies and wetlands are within Modified Proposed Route. The anticipated centerline was developed along property lines and paralleling County Road 128 and County Road 59. As shown in Appendix 1, while the Modified Proposed Route crosses these waterbodies and wetlands, the Rabbit River, an unnamed water, Ironton Creek, the western edge of a wetland, and the western edge of Snowshoe Mine Lake are crossed by the Modified Proposed Route right-of-way.</p>

²⁹ LRL Comments at 10.

³⁰ MnDNR Exceptions to the ALJ Report at 18 (Nov. 25, 2024) (eDocket No. [202411-212371-01](#)) (emphasis added).

³¹ LRL Comments at 10.

Little Rabbit Lake Landowners' Comment	Applicants' Response
<p>The CLMR would cross impaired Little Rabbit Lake twice, because the Applicants would follow both of the existing powerline crossings over the south bowl of the lake. It would also cross protected wetlands on the northwest corner of the body of water that forms where the Little Rabbit River empties into Little Rabbit Lake.</p>	<p>The identified waterbodies are within the Co-location Maximization Route. As shown in Appendix 2, Rabbit Lake would be crossed once by the Co-location Maximization Route right-of-way, co-located with existing transmission line crossings.</p>
<p>[Route alternatives] E4 and E5 run[] along existing powerline rights of way in unpopulated areas. . . . [they] proceed[] through Crow Wing County tax forfeit land, thereby avoiding private property and structures.³²</p>	<p>Route alternatives E4 and E5 cross tax forfeit lands between the Cuyuna Series Compensation Station and the northern Mississippi River channel. The remaining area of route alternatives E4 and E5 is comprised of privately-owned parcels as shown in Appendix 3. Appendix 3 shows route alternatives E4 and E5 in the location identified by LRL in Exhibit C to their comments.</p>
<p>The [Modified Proposed Route] requires the MPUC to authorize a 3,000-foot-wide route corridor within which the Applicants' would have <i>carte blanche</i> to wreck their destruction to build and then maintain their massive power towers.³³</p>	<p>As with any Route Permit, the anticipated center line within a route width is the starting point for Permittees when designing a project and obtaining land rights. The Route Permit contains significant compliance filing requirements that Permittees must abide by in finalizing a designed centerline and right-of-way for a project, including providing information on environmental impacts should a designed alignment and right-of-way deviate from the anticipated alignment and right-of-way. These compliance filings are subject to the review and oversight of EERA and the Commission throughout the development process.</p>

³² LRL Comments at 10.

³³ LRL Comments at 11.

Little Rabbit Lake Landowners' Comment	Applicants' Response
<p>The [Co-location Maximization Route] is similarly destructive . . . such a corridor engulfs virtually every existing residence along Bluegill Road on the west side of Little Rabbit Lake.³⁴</p>	<p>The Co-location Maximization Route specifically utilizes the existing transmission line rights-of-way in the area. The proposed double circuit 345kV line would replace the existing 230 kV line on the existing right-of-way, requiring only an additional 20 feet of right-of-way beyond the edge of the existing right-of-way. The existing 230 kV line will be consolidated with the other existing lines on their existing rights-of-way, similarly requiring minimal additional right-of-way. The Project and its right-of-way will not use the entire route width and EERA and the Commission will receive compliance filings identifying the final right-of-way for the Project prior to construction.</p>
<p>But those maps [referring to Attachment 2 to the Applicants' January 10, 2025 Comments) clearly have been drawn to ensure the existing structures fall "within 75 feet of the alignment of route alternative E4 and route alternative E5."³⁵</p>	<p>The route alternative E4 and E5 centerlines were provided by EERA and this is how EERA and the EA evaluated these routes – the alignments were not drawn by the Applicants. And LRL's comments about "moving the hypothetical centerline" in each instance fails to take into account that the existing 115 kV and 230 kV transmission lines still needs to be located in this area, so the Project cannot just overtake the existing transmission lines rights-of-way and its centerline with also accounting for the relocation of the existing lines within the area.</p>

³⁴ LRL Comments at 11.

³⁵ LRL Comments at 11.

Little Rabbit Lake Landowners' Comment	Applicants' Response
<p>The Applicants' first asserted E4/E5 would require displacing 3 "residences." When forced to identify those residences by the MPUC, they back-tracked and now admit "[b]ased on a desktop review' that there are (1) a garage; (2) "an accessory structure;" and (3) a residence within 75 feet of the right-of-way.³⁶</p>	<p>These structures were identified as residences in the EA. As stated in the EA: "In addition, this route alternative may require residential displacement."³⁷</p> <p>The Applicants' initial comments were based on the EA analysis and identification of these as "residences." During the succeeding months, the Applicants were able to complete a visual inspection of these properties and update the status of these structures.³⁸</p>
<p>The first page of Exhibit G is the Applicants' CLMR route map showing the wide swath of land within which the Applicants want to be able to operate and place their 345kV powerline towers. Superimposed on the map is a neon green line, which, more accurately than the Applicants' efforts, draws the right-of-way centerline just slightly to the east (right) on the map. That centerline then impacts many of the dwellings and structures along the west shore of Little Rabbit Lake.³⁹</p>	<p>As with any Route Permit, the anticipated center line within a route width is the starting point for Permittees when designing a project and obtaining land rights. The Route Permit contains significant compliance filing requirements that Permittees must abide by in finalizing a designed centerline and right-of-way for a project, including providing information on environmental impacts should a designed alignment and right-of-way deviate from the anticipated alignment and right-of-way. These compliance filings are subject to the review and oversight of EERA and the Commission throughout the development process. The Co-location Maximization Route (incorporating route alternative E1 in this area) was specifically designed to maximize utilization of the existing rights-of-way and compliance filings would need to explain any deviation from this intent. Therefore, the Applicants' representation of the centerline for route alternative E1, which is identical to the centerline studied in the EA and currently under consideration by the Commission as part of the Co-location Maximization Route, is accurate.</p>

³⁶ LRL Comments at 11 at n.8.

³⁷ EA at Table 6-62 at n.4.

³⁸ Applicants' Response to Commission's Request for Comments at 3 (Jan. 10, 2025) (eDocket No. [20251-213840-01](#)).

³⁹ LRL Comments at 12-13.

Little Rabbit Lake Landowners' Comment	Applicants' Response
<p>Although the ALJ apparently accepted the Applicants' commitments to work closely with appropriate state agencies, such as the MnDNR and MnPCA, to implement impact mitigation measures, given their established lack of credibility, the LRL respectfully suggests that the Applicants cannot be trusted to perform as promised.⁴⁰</p>	<p>As this Commission is aware, the Permittees must complete compliance filings and pre-construction requirements under any Route Permit from the Commission. Additionally, the Applicants will need to work with the MnDNR and the MPCA on any permits required for the Project and compliance therewith. Such a statement by the LRL is unfair and certainly not supported by the record.</p>

⁴⁰ LRL Comments at 15.

Indeed, the Applicants are not aware of several residences that have been built within the past 18 months that fall directly within their requested ROWs and likely will have to be removed. The Applicants either do not realize, or do not want to disclose, that the MPR and CLMR will preclude a number of property owners from proceeding with long-planned building projects.⁴¹

As with any Route Permit, the anticipated center line within a route width is the starting point for Permittees when designing a project and obtaining land rights. The Route Permit contains significant compliance filing requirements that Permittees must abide by in finalizing a designed centerline and right-of-way for a project, including providing information on environmental impacts should a designed alignment and right-of-way deviate from the anticipated alignment and right-of-way. These compliance filings are subject to the review and oversight of EERA and the Commission throughout the development process.

The Applicants have carefully developed the proposed route widths for the Project to allow for certain flexibility when designing the Project. As to the Modified Proposed Route, a wider route width is requested to accommodate new structures that may have been built between when a map was created at a moment in time (whether by the Applicants or by EERA) and the initiation of landowner contacts after issuance of a Route Permit. As to the Co-location Maximization Route, the route was designed to maximize the use of existing transmission line rights-of-way and the anticipated centerline only requires a minimal amount of additional right-of-way at the edges of the existing right-of-way. Because permanent structures are generally not allowed in existing rights-of-way, there should not be any new residences constructed within the requested existing right-of-way for the Co-location Maximization Route. Furthermore, any property owners planning building projects within or adjacent to these existing rights-of-way are doing so knowing there is a significant transmission line corridor in this area including 69 kV, 115 kV, and 230 kV transmission lines.

Further, the State of Minnesota has a long-held preference for following existing transmission lines where practicable when new

Little Rabbit Lake Landowners' Comment	Applicants' Response
	<p>projects are proposed as codified in Minn. Stat. § 216E.03, subd. 7(e): “The commission must make specific findings that it has considered locating a route for a high-voltage transmission line on an existing high-voltage transmission route and the use of parallel existing highway right-of-way and, to the extent those are not used for the route, the commission must state the reasons.” In either instance, Applicants will work with landowners to the greatest extent practicable on the location of the Project to avoid existing structures.</p>
<p>The Applicants also never realized or understood that their MPR and CLMR would be built across wetlands and impaired waterways protected by the Federal Clean Water Act, 33 U.S.C. §§1251-1387.⁴²</p>	<p>The Applicants had meaningful and detailed discussions with the MnDNR and USACE as they were developing route alternative E1 to ensure that the route would be capable of being permitted by these resource agencies. The crossings that LRL identifies associated with the Co-location Maximization Route were included in those discussions.</p>
<p>Given these facts, the MPR and CLMR, which will require massive footings sunk into the water table, likely will adversely affect the water table level and thereby the existing wells of area residents. The footings may impair water quality.⁴³</p>	<p>Impacts to groundwater during construction and operation of the Project are not anticipated. Structure foundations will generally range in depth. All foundation materials will be non-hazardous. Any effects on water tables would be localized and short term and would not affect hydrologic resources. Prior to construction, geotechnical investigations will be completed to help identify shallow depth to groundwater resource areas, and foundations will be designed accordingly. The Applicants will continue to work with landowners to identify springs and wells near the Proposed Route. .</p>

⁴¹ LRL Comments at 16.

⁴² LRL Comments at 16.

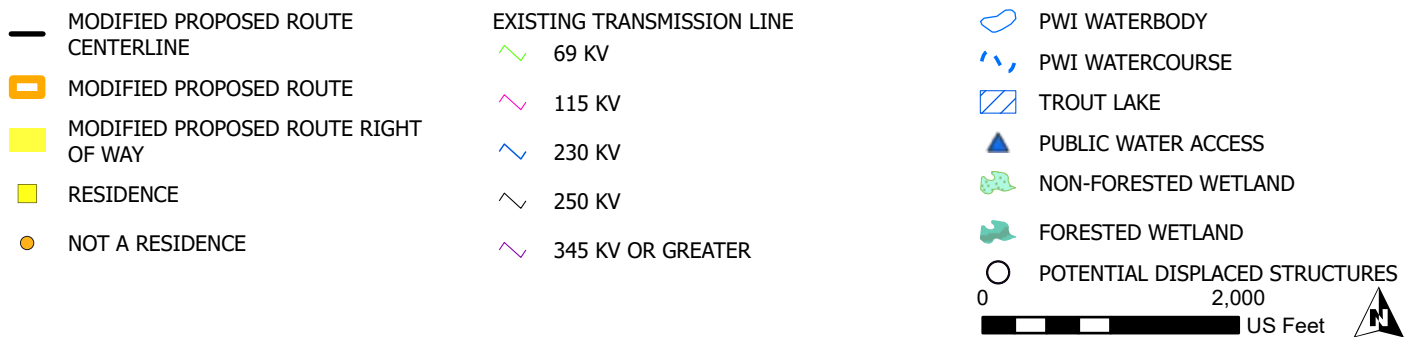
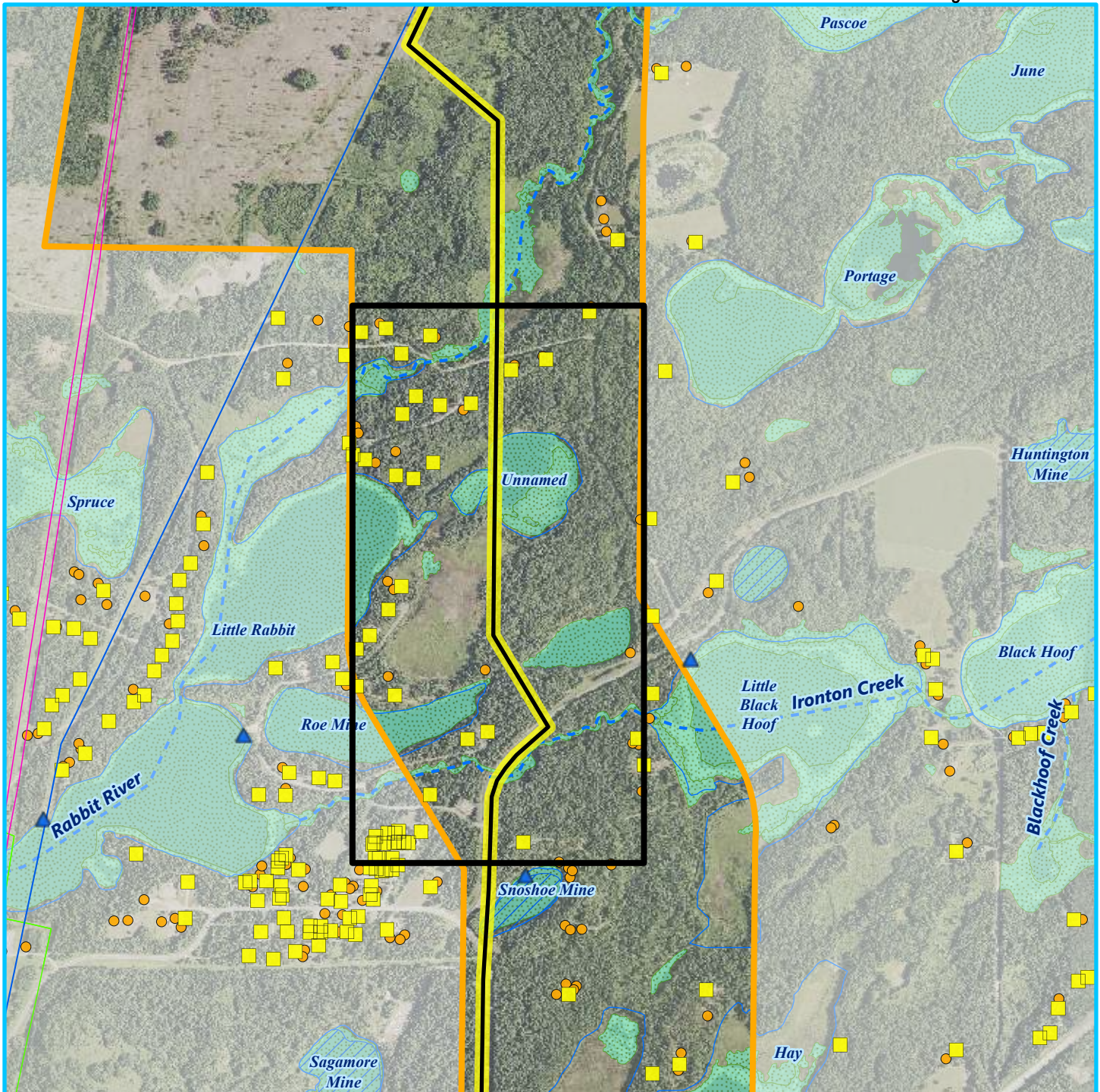
⁴³ LRL Comments at 17.

Little Rabbit Lake Landowners' Comment	Applicants' Response
<p>The Applicants presently do not adequately maintain their existing right-of-way zones. . . . One need only consider the devastation wrought in Hawaii, California and Colorado from wildfires caused by public utilities' powerlines. Approving the Applicants' MPR or CLMR, which would be close to dozens and dozens of existing homes and buildings, makes no sense. The MPUC should not ignore this significant, common-sense risk that would arise from ignoring the findings and recommendations in the ALJ Decision.⁴⁴</p>	<p>The Applicants take vegetation management very seriously and work with all landowners on a recurring maintenance cycle to address vegetation within the right-of-way. Many of the lines within or near the routes under consideration for the Project have deferred ongoing maintenance until after a decision has been made on the Certificate of Need and Route Permit.</p>

⁴⁴ LRL Comments at 17.

Date: 1/21/2025

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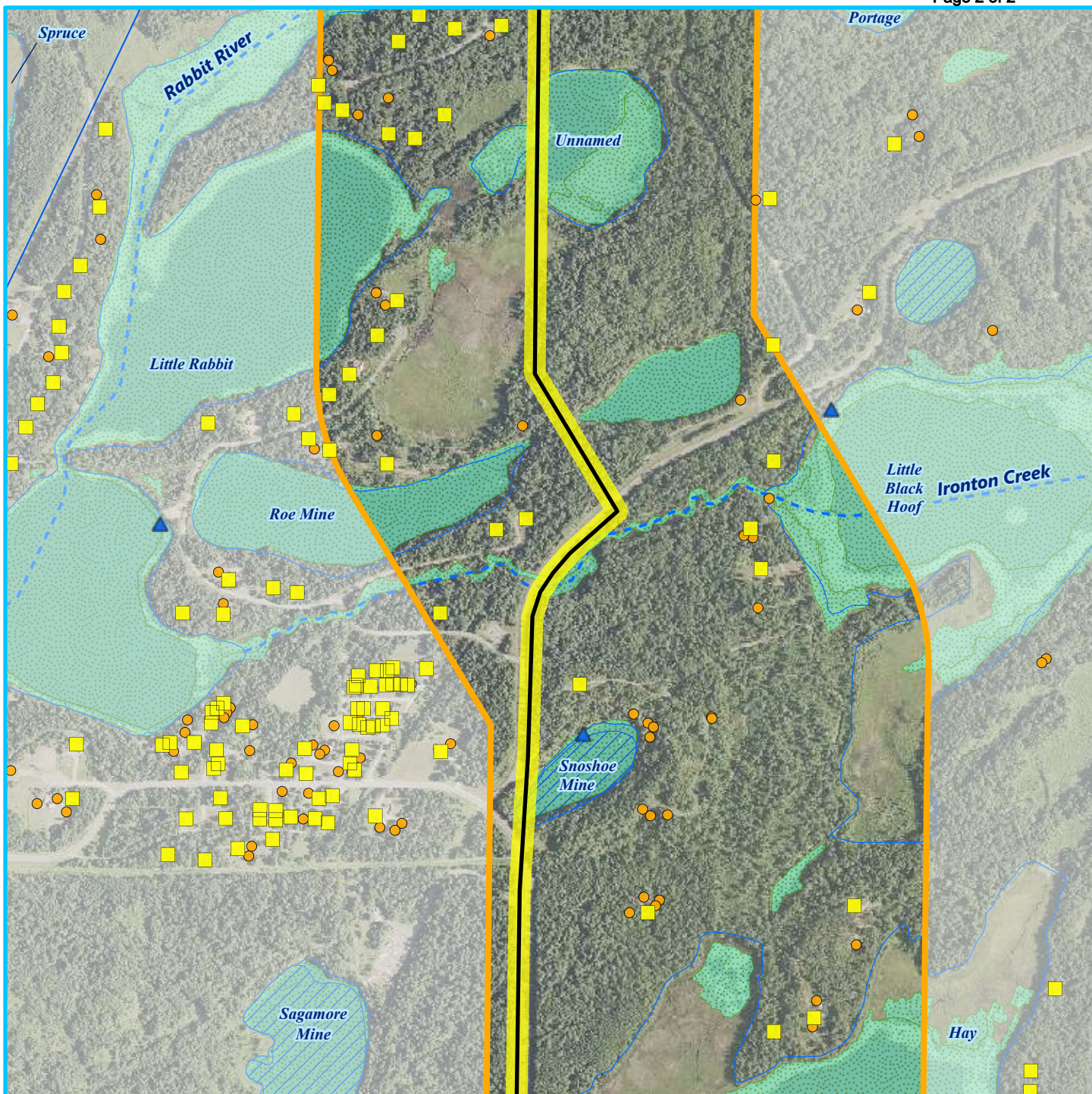


















MODIFIED PROPOSED ROUTE AND RABBIT LAKE AREA

Northland Reliability Project



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- | | | | | | |
|---|--------------------------------------|---|----------------------------------|---|----------------------|
|  | MODIFIED PROPOSED ROUTE CENTERLINE |  | EXISTING TRANSMISSION LINE 69 KV |  | PWI WATERBODY |
|  | MODIFIED PROPOSED ROUTE |  | 115 KV |  | PWI WATERCOURSE |
|  | MODIFIED PROPOSED ROUTE RIGHT OF WAY |  | 230 KV |  | TROUT LAKE |
|  | RESIDENCE |  | 250 KV |  | PUBLIC WATER ACCESS |
|  | NOT A RESIDENCE |  | 345 KV OR GREATER |  | NON-FORESTED WETLAND |
| | | | |  | FORESTED WETLAND |

A horizontal scale bar with a black background and white markings. The bar is divided into four equal segments by white vertical lines. The first segment is labeled '0' at its left end, and the fourth segment is labeled '2,000' at its right end. Below the bar, the text 'US Feet' is written in black.



MODIFIED PROPOSED ROUTE AND RABBIT LAKE AREA

Northland Reliability Project



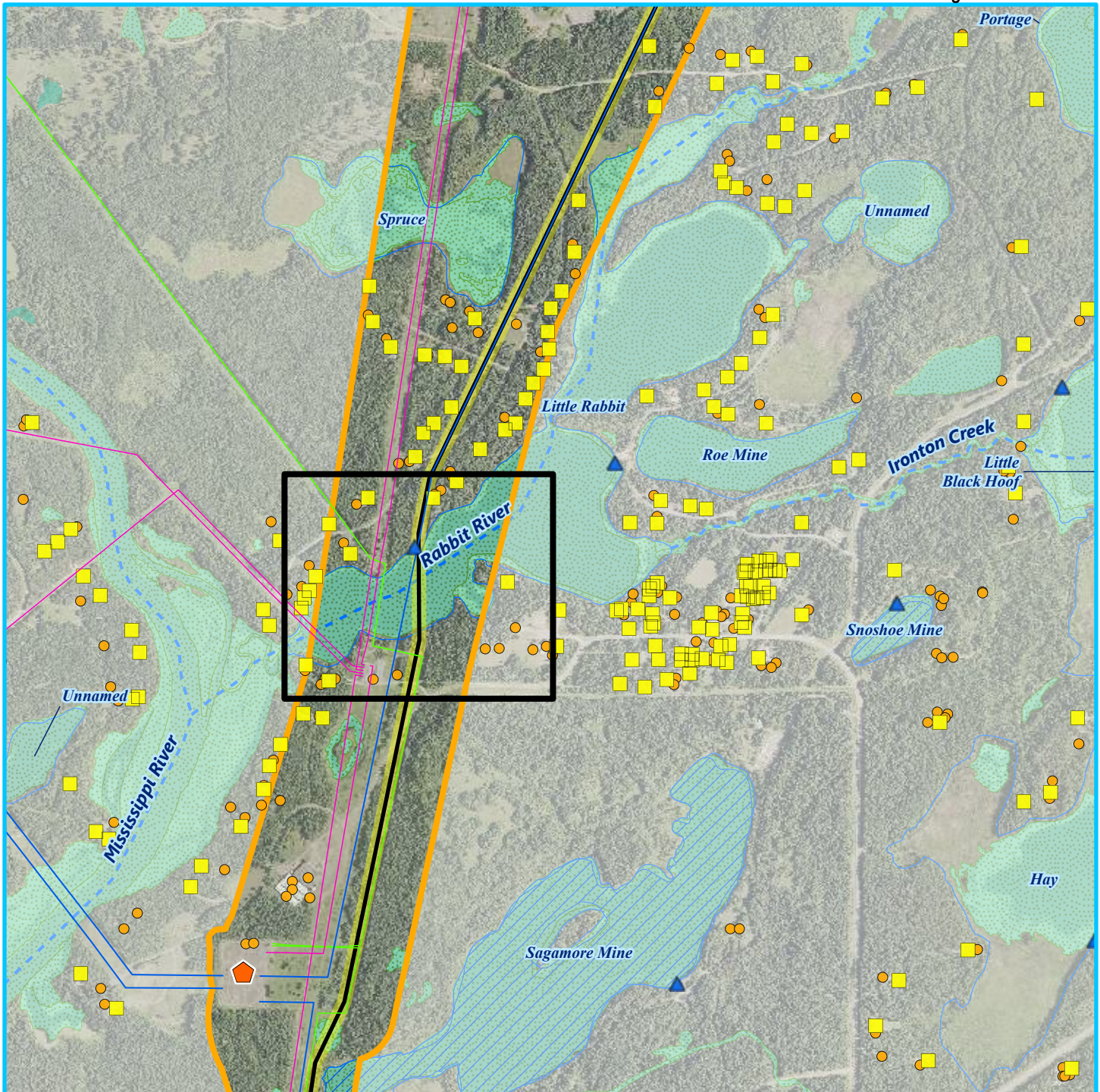
**GREAT
RIVER
ENERGY**



minnesota power

Date: 1/20/2025

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- APPLICANTS' CO-LOCATION MAXIMIZATION ROUTE
- PROPOSED ROW
- PROPOSED CENTERLINE
- RIVERTON SUBSTATION
- RESIDENCE
- NOT A RESIDENCE

- EXISTING TRANSMISSION LINE
- 69 KV
- 115 KV
- 230 KV
- 250 KV
- 345 KV OR GREATER

- PWI WATERBODY
- PWI WATERCOURSE
- TROUT LAKE
- PUBLIC WATER ACCESS
- NON-FORESTED WETLAND
- FORESTED WETLAND

0 2,000
US Feet



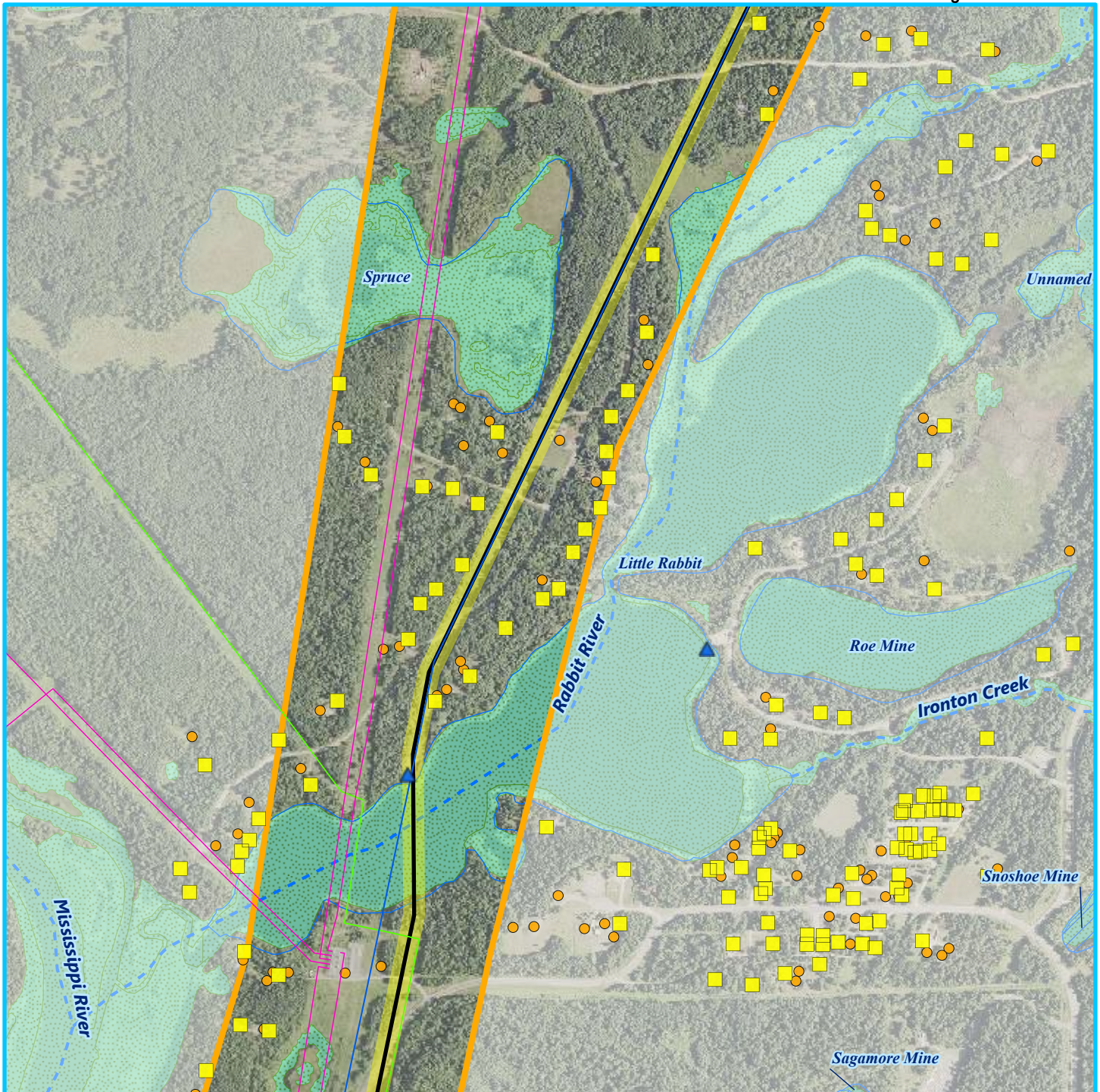
CO-LOCATION MAXIMIZATION ROUTE AND RABBIT LAKE AREA






Northland Reliability Project














Date: 1/20/2025

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-  APPLICANTS' CO-LOCATION MAXIMIZATION ROUTE
-  PROPOSED ROW
-  PROPOSED CENTERLINE
-  RESIDENCE
-  NOT A RESIDENCE

- EXISTING TRANSMISSION LINE
-  69 KV
-  115 KV
-  230 KV
-  250 KV
-  345 KV OR GREATER

-  PWI WATERBODY
-  PWI WATERCOURSE
-  TROUT LAKE
-  PUBLIC WATER ACCESS
-  NON-FORESTED WETLAND
-  FORESTED WETLAND

0 2,000 US Feet



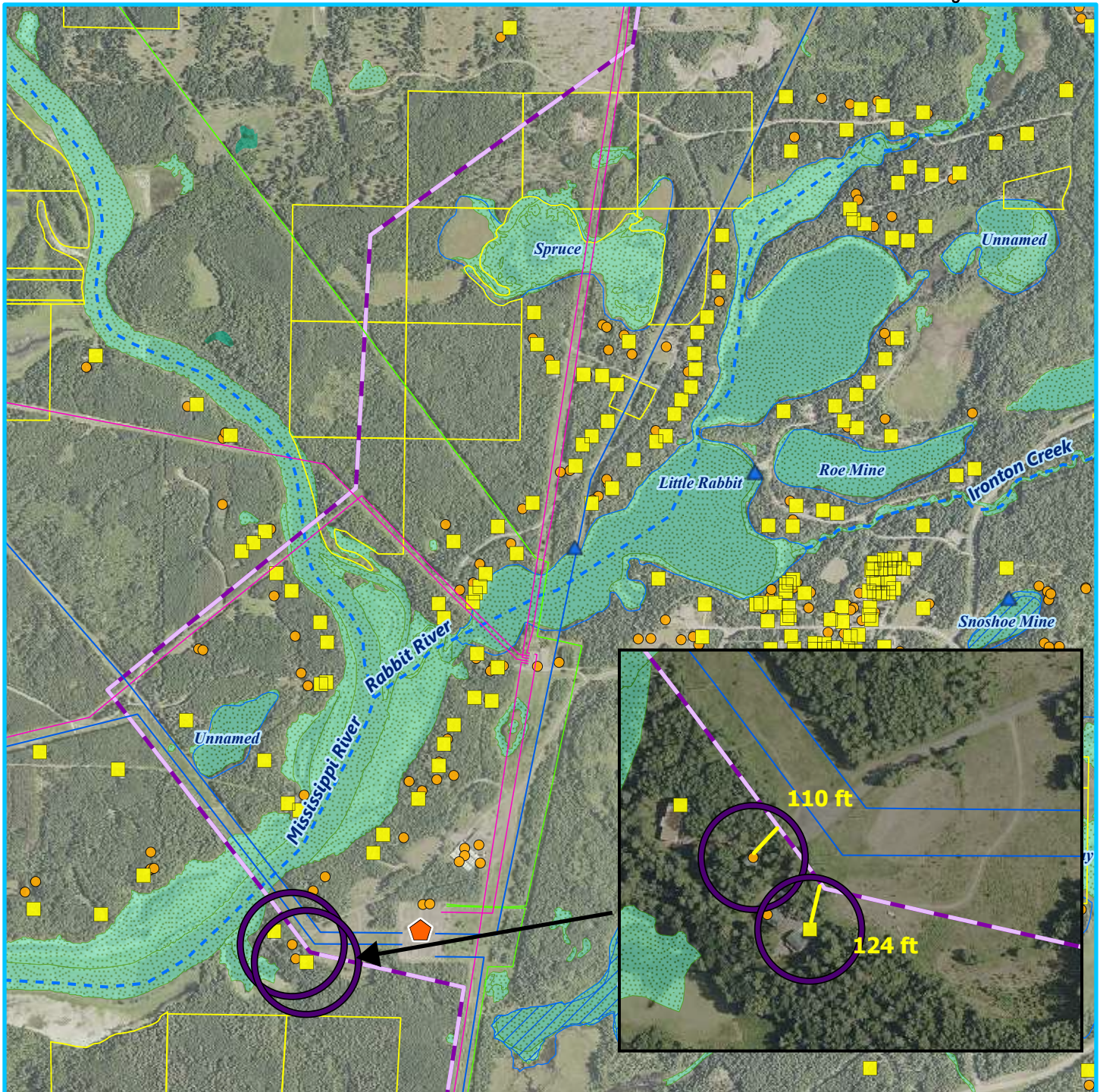
CO-LOCATION MAXIMIZATION ROUTE AND RABBIT LAKE AREA

Northland Reliability Project



Date: 1/21/2025

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- | | | |
|---|-------------------|--------------------------------|
| MODIFIED ALTERNATIVE ALIGNMENT E4/E5 CENTERLINE | 115 KV | TROUT LAKE |
| RIVERTON SUBSTATION | 230 KV | PUBLIC WATER ACCESS |
| RESIDENCE | 250 KV | NON-FORESTED WETLAND |
| NOT A RESIDENCE | 345 KV OR GREATER | FORESTED WETLAND |
| EXISTING TRANSMISSION LINE | PWI WATERBODY | TAX FORFEITED PROPERTY PARCELS |
| 69 KV | PWI WATERCOURSE | POTENTIAL DISPLACED STRUCTURES |

0 2,000
US Feet



ALTERNATIVE ALIGNMENTS E4 & E5 AND RABBIT LAKE AREA

Northland Reliability Project



Applicants' Revisions to Decision Option 6

In the Matter of Minnesota Power and Great River Energy for a Certificate of Need and Route Permit for up to an approximately 180-mile, double circuit 345-kV transmission.

PUC Docket No. E015,ET2/CN-22-416 & E015,ET2/TL-22-415

Commissioner Tuma offers the following revised Decision Option 6:

TUMA REVISED 6:

Issue a route permit to Minnesota Power and Great River Energy for the Northland Reliability Project authorizing the Co-Location Maximization Route proposed by the Applicants, and adopt the ALJ's findings and conclusions consistent with that route, except as modified below:

a. Iron Range Substation Region

- ii. Reject ALJ Findings 97 and 737 and ALJ Conclusions 11 and 14 (Staff if A3 is not selected), and
- viii. Adopt the Applicants' route and EERA's modified Findings 97 and 737 filed on 11/25/2024. (EERA, Staff)

b. Hill City to Little Pine Region

- i. ~~Adopt AA1 (Public)~~ For the property identified in AA1 require the applicant to continue the proposed route to the south and east of the 92 line without the proposed realignment, and require the permittee to work with the affected landowners to provide mitigation or relocation in consultation with the Landowner Resolution Liaison.

- vii. ~~Do not adopt~~ the Swatara route width expansion, but require the applicant to continue the proposed route anticipated centerline to the east of the 92 line, and require the permittee to work with the affected land owners to provide mitigation or relocation ~~in consultation with the Landowner Resolution Liaison.~~

c. Cole Lake to Riverton Region

- iii. Reject the ALJ's Finding 737 and Conclusions 11 and 14. (Staff, if any of the below routes are selected in this region),
- xvi. Adopt the Applicants' route and EERA's modification to Findings 116 and 737 filed on 11/25/2024. (EERA, Staff)
- xvii. Extend the co-location at the Mississippi River in Perry Lake Township to reduce the number of structures at the Mississippi Crossing as proposed by the applicant in their Attachment 1 of their January 10, 2025 filing.

Applicants' Revisions to Decision Option 6

d. Long Lake Region

ii. Adopt H4/H7 Applicants' modified route alternative (ALJ, Staff)

xv. Reject ALJ Finding 738 and Conclusions 11 and 14 (Staff if any of the above routes are selected in this region)

xvi. ~~From the North, follow H1~~ Follow the Applicants' route to and through Applicants' modified H4/H7, but when it reaches the northern boundary of Erickson's property, locate the line on the eastern boundary of the 3,000-foot route width leading to and through Applicants' modified H4/H7. (Erickson/Loehr, Staff)

xvii. Expand the route width at the already expanded Area at the intersection of Minnesota Highway 18, CSAH 23 and County Road 159 in Crow Wing County by another 500-1,000 feet to the north ~~and to allow the Applicants work with the landowners and the Landowner-Resolution Liaison~~ in this portion of the route to identify acceptable route from West to East in this area.

xviii. When the Applicants come to the Commission for cost recovery of the Project, for the portion between Platte Township Crow Wing County and Mayhew Township Morrison County the realignments of the existing 230kv lines, the Applicants must provide information justifying any realignments incorporated into the Project ~~are not adopted unless the applicant can show opportunities for land acquisition or mitigation that would not require realignment are fully explored with landowners and the Landowner Resolution Liaison; Applicants bear the risk of denial of cost recovery for realignments found to be imprudent and unreasonable.~~

e. Benton County Elk River Region

i. Adopt the Co-Location Maximization Route (ALJ, Staff, Applicants)

f. Additional Findings and Conclusion

iii. Adopt the Applicants' alternative modifications to ALJ Conclusion 11 as filed on 11/25/2024, to the extent it aligns with other decisions made by the Commission. (If the Commission does not adopt ALJ's recommendation to include A3, E4, E5, H1, or modified H4/H7) (Staff)

Applicants' Revisions to Decision Option 9B - Clean

9B. Co-Location Maximization Route shifting of structures of the existing Co-Location line(s): The Co-location Maximization Route is approved as proposed by the Applicants, except as modified within this Order. The approved Co-location Maximization Route includes an anticipated centerline that incorporates certain shifting of existing transmission lines to accommodate structures that have been erected near existing transmission lines as detailed in Section III of the Applicants' January 10, 2025 filing. The permittee shall continue to work with landowners in advance of the plan and profile filing to explore possible mitigations or property purchases that would eliminate the need for shifting the existing transmission lines. As part of the plan and profile filing, the Permittees shall file in edockets a description of their resolutions, proposed actions, and final design for review by EERA.

Applicants' Revisions to Decision Option 9B - Compare

9B. Co-Location Maximization Route shifting of structures of the existing Co-Location line(s):
 The Co-location Maximization Route is approved as proposed by the Applicants, except as modified within this Order. The approved Co-location Maximization Route includes an anticipated centerline that incorporates certain shifting of existing transmission lines ~~for which the project is proposed to co-locate shall not be adjusted around impacted residence, agricultural structures or properties subject to the "Buy the farm" Statute unless the cost of the possible mitigation or acquisition of the property is greater than 75% of the estimated mid-range cost of the realignment~~ to accommodate structures that have been erected near existing transmission lines as detailed in Section III of the Applicants' January 10, 2025 filing. The permittee shall ~~enter into negotiations~~ continue to work with landowners in advance of the ~~final~~ plan and profile filing to explore possible mitigations or property purchases. ~~In addition to property acquisition any relocation of residence shall provide for moving costs, legal fees, appraisals, construction estimates and other expenses necessary to make the landowner whole as deemed appropriate by the Landowner Resolution Liaison. Thirty days before the final~~ that would eliminate the need for shifting the existing transmission lines. As part of the plan and profile ~~meeting~~ filing, the ~~permittee~~ Permittees shall file in edockets a description of their resolutions, proposed actions, ~~or status of negotiations with all impacted landowners. The Landowner Resolution Liaison shall provide responses within 15 days of any concerns identified along with a recommendation regarding whether permittee's actions have been reasonable and in the public interest. If final resolutions with these landowners has not been reached by the plan and profile meeting the Liaison shall continue to monitor resolution and provide regular updates as outlined in their contract~~ and final design for review by EERA.

IN THE MATTER OF THE APPLICATION OF
MINNESOTA POWER AND GREAT RIVER
ENERGY FOR A CERTIFICATE OF NEED AND
ROUTE PERMIT FOR THE NORTHLAND
RELIABILITY PROJECT 345 kV
TRANSMISSION LINE

MPUC DOCKET NOS. E015,ET2/CN-22-415
AND E015,ET2/TL-22-416

OAH DOCKET No. 21-2500-39822

CERTIFICATE OF SERVICE

Carly Krause certifies that on the 22nd day of January, 2025, on behalf of Minnesota Power and Great River Energy, she efiled a true and correct copy of the **Applicants' Responses to January Comments and Decision Options** via [eDockets](#). Said document was also served via U.S. Mail or email as designated on the attached Service Lists on file with the Minnesota Public Utilities Commission in the above-referenced dockets.

/s/ Carly Krause

Carly Krause

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
1	Lisa	Agrimonti	lagrimonti@fredlaw.com	Fredrikson & Byron, P.A.		60 South Sixth Street Suite 1500 Minneapolis MN, 55402-4400 United States	Electronic Service		No	22-415Official
2	Jim	Atkinson	jbatkinson@allete.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	22-415Official
3	Matthew	Brodin	mbrodin@allete.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	22-415Official
4	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	22-415Official
5	MP Regulatory	Compliance	mpregulatorycompliance@mnpower.com	Minnesota Power		30 W Superior St. Duluth MN, 55802 United States	Electronic Service		No	22-415Official
6	Brandon	Crawford	brandonc@cubminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota St Ste W1360 St. Paul MN, 55101 United States	Electronic Service		No	22-415Official
7	Richard	Dornfeld	richard.dornfeld@ag.state.mn.us		Office of the Attorney General - Department of Commerce	Minnesota Attorney General's Office 445 Minnesota Street, Suite 1800 Saint Paul MN, 55101 United States	Electronic Service		No	22-415Official
8	Adam	Duininck	aduininck@ncscc.org	North Central States Regional Council of Carpenters		700 Olive Street St. Paul MN, 55130 United States	Electronic Service		No	22-415Official
9	Bret	Eknes	bret.eknes@state.mn.us		Public Utilities Commission	Suite 350 121 7th Place East St. Paul MN, 55101-2147 United States	Electronic Service		No	22-415Official
10	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	22-415Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
11	Zachary	Golkowski	zgolkowski@mnpower.com	Minnesota Power		30 W. Superior Street Duluth MN, 55802 United States	Electronic Service		No	22-415Official
12	Abigail	Hencheck	ahencheck@mncenter.org	Minnesota Center for Environmental Advocacy		1919 University Ave W Suite 515 St. Paul MN, 55104 United States	Electronic Service		No	22-415Official
13	Valerie	Herring	vherring@taftlaw.com	Taft Stettinius & Hollister LLP		2200 IDS Center 80 S. Eighth Street Minneapolis MN, 55402 United States	Electronic Service		No	22-415Official
14	Brian	Hunker	bhunker@greenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	22-415Official
15	Craig	Janezich	craig.janezich@state.mn.us		Public Utilities Commission	121 7th Pl E #350 St. Paul MN, 55101 United States	Electronic Service		No	22-415Official
16	Raymond	Kirsch	raymond.kirsch@state.mn.us		Department of Commerce	85 7th Place E Ste 500 St. Paul MN, 55101 United States	Electronic Service		No	22-415Official
17	Stacy	Kotch Egstad	stacy.kotch@state.mn.us		MINNESOTA DEPARTMENT OF TRANSPORTATION	395 John Ireland Blvd. St. Paul MN, 55155 United States	Electronic Service		No	22-415Official
18	Jennifer	Kuklenski	jkuklenski@mnpower.com	Minnesota Power		30 West Superior Street Duluth MN, 55082 United States	Electronic Service		No	22-415Official
19	Dan	Leshner	dlesher@greenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	22-415Official
20	Discovery	Manager	discoverymanager@mnpower.com	Minnesota Power		30 W Superior St Duluth MN, 55802 United States	Electronic Service		No	22-415Official
21	John	McElfresh	john@bvgassistedliving.com			18323 County Road 22 Brainerd MN, 56401 United States	Electronic Service		No	22-415Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
22	Brian	Meloy	bmeloy@grenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	22-415Official
23	Kimberly	Middendorf	kimberly.middendorf@state.mn.us		Office of Administrative Hearings	PO Box 64620 600 Robert St N Saint Paul MN, 55164-0620 United States	Electronic Service		No	22-415Official
24	David	Moeller	dmoeller@allte.com	Minnesota Power			Electronic Service		No	22-415Official
25	Carol A.	Overland	overland@legalelectric.org	Legalelectric - Overland Law Office		1110 West Avenue Red Wing MN, 55066 United States	Electronic Service		No	22-415Official
26	Andre	Porter	misolegal@misoenergy.org	MISO		720 City Center Drive Carmel IN, 46032 United States	Electronic Service		No	22-415Official
27	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	22-415Official
28	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	22-415Official
29	Nathaniel	Runke	nrunke@local49.org			611 28th St. NW Rochester MN, 55901 United States	Electronic Service		No	22-415Official
30	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	22-415Official
31	Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates		7400 Lyndale Ave S Ste 190 Richfield MN, 55423 United States	Electronic Service		No	22-415Official
32	Kodi	Verhalen	kverhalen@taftlaw.com	Taft Stettinius & Hollister LLP		80 S 8th St Ste 2200 Minneapolis MN, 55402 United States	Electronic Service		No	22-415Official
33	Haley	Waller Pitts	hwallerpitts@fredlaw.com	Fredrikson & Byron, P.A.		60 S Sixth St Ste 1500 Minneapolis	Electronic Service		No	22-415Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						MN, 55402-4400 United States				
34	Cynthia	Warzecha	cynthia.warzecha@state.mn.us	Minnesota Department of Natural Resources		500 Lafayette Road Box 25 St. Paul MN, 55155-4040 United States	Electronic Service		No	22-415Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
1	Lisa	Agrimonti	lagrimonti@fredlaw.com	Fredrikson & Byron, P.A.		60 South Sixth Street Suite 1500 Minneapolis MN, 55402-4400 United States	Electronic Service		No	22-416Official
2	Michael	Ahern	ahern.michael@dorsey.com	Dorsey & Whitney, LLP		50 S 6th St Ste 1500 Minneapolis MN, 55402-1498 United States	Electronic Service		No	22-416Official
3	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	22-416Official
4	Jay	Anderson	jaya@cmpas.org	CMPAS		7550 Corporate Way Suite 100 Eden Prairie MN, 55344 United States	Electronic Service		No	22-416Official
5	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	22-416Official
6	Kristine	Anderson	kanderson@greatermngas.com	Greater Minnesota Gas, Inc.		1900 Cardinal Lane PO Box 798 Faribault MN, 55021 United States	Electronic Service		No	22-416Official
7	Jaime	Arsenault	jaime.arsenault@whiteearth-nsn.gov	White Earth		PO BOX 418 White Earth MN, 56591 United States	Electronic Service		No	22-416Official
8	Jim	Atkinson	jbatkinson@allete.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	22-416Official
9	David	Bell	david.bell@state.mn.us		Department of Health	POB 64975 St. Paul MN, 55164 United States	Electronic Service		No	22-416Official
10	Melanie	Benjamin	melanie.benjamin@millelacsband.com			43408 Odena Drive Onamia MN, 56359 United States	Electronic Service		No	22-416Official
11	James J.	Bertrand	james.bertrand@stinson.com	STINSON LLP		50 S 6th St Ste 2600 Minneapolis MN, 55402 United States	Electronic Service		No	22-416Official
12	Seth	Bichler	sethbichler@fdlrez.com	Fond du Lac Band of Lake Superior Chippewa		1720 Big Lake Rd Cloquet MN, 55720 United States	Electronic Service		No	22-416Official
13	David	Birkholz	david.birkholz@state.mn.us	MN Department of Commerce		Suite 500 85 7th Place East St. Paul MN,	Electronic Service		No	22-416Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						55101-2198 United States				
14	Michelle F.	Bissonnette	michelle.bissonnette@hdrinc.com	HDR Engineering, Inc.		Golden Hills Office Center 701 Xenia Ave S Ste 600 Minneapolis MN, 55416 United States	Electronic Service		No	22-416Official
15	Hunter	Boldt	hunterboldt@redlakenation.org	Red Lake Nation		15484 Migizi Drive Red Lake MN, 56671 United States	Electronic Service		No	22-416Official
16	Sheldon	Boyd	sheldon.boyd@millelacsband.com	Mille Lacs Band of Ojibwe		43408 Oodena Drive Onamia MN, 56359 United States	Electronic Service		No	22-416Official
17	Matthew	Brodin	mbrodin@allete.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	22-416Official
18	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	22-416Official
19	Christina	Brusven	cbrusven@fredlaw.com	Fredrikson Byron		60 S 6th St Ste 1500 Minneapolis MN, 55402-4400 United States	Electronic Service		No	22-416Official
20	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	22-416Official
21	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	22-416Official
22	Robert	Budreau	robert.budreau@llojibwe.net	Leech Lake Band of Ojibwe		190 Sailstar Drive NW Cass Lake MN, 56633 United States	Electronic Service		No	22-416Official
23	James	Canaday	james.canaday@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	Suite 1400 445 Minnesota St. St. Paul MN, 55101 United States	Electronic Service		No	22-416Official
24	PUC	CAO	consumer,puc@state.mn.us		Public Utilities Commission	Consumer Affairs Office 121 7th Place E Suite 350 St. Paul MN, 55101 United States	Electronic Service		No	22-416Official
25	Cathy	Chavers	cchavers@boisforte-nsn.gov	Bois Forte Band of Chippewa		Bois Forte Tribal Government 5344 Lakeshore Drive Nett Lake MN,	Electronic Service		No	22-416Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						55772 United States				
26	Michael	Childs, Jr.	michael.childsjr@piic.org	Prairie Island Indian Community		Prairie Island Indian Community 5636 Sturgeon Lake Road Welch MN, 55089 United States	Electronic Service		No	22-416Official
27	Cody	Chilson	cchilson@greatermngas.com	Greater Minnesota Gas, Inc. & Greater MN Transmission, LLC		1900 Cardinal Ln PO Box 798 Faribault MN, 55021 United States	Electronic Service		No	22-416Official
28	Ray	Choquette	rchoquette@agp.com	Ag Processing Inc.		12700 West Dodge Road PO Box 2047 Omaha NE, 68103-2047 United States	Electronic Service		No	22-416Official
29	John	Coffman	john@johncoffman.net	AARP		871 Tuxedo Blvd. St, Louis MO, 63119-2044 United States	Electronic Service		No	22-416Official
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	22-416Official
31	Bill	Cook	bcook@rpu.org	Rochester Public Utilities		4000 East River Road NE Rochester MN, 55906 United States	Electronic Service		No	22-416Official
32	Water Programs	Coordinator	waterprograms.bwsr@state.mn.us		Minnesota Board of Water and Soil Resources	520 Lafayette Road N St. Paul MN, 55155 United States	Electronic Service		No	22-416Official
33	John	Crane	johncranefishing@gmail.com	Fishing		1250 Wee Gwaus DR SW Bemidji MN, 56601 United States	Electronic Service		No	22-416Official
34	Brandon	Crawford	brandonc@cubminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota St Ste W1360 St. Paul MN, 55101 United States	Electronic Service		No	22-416Official
35	Hillary	Creurer	hcreurer@allete.com	Minnesota Power		30 W Superior St Duluth MN, 55802 United States	Electronic Service		No	22-416Official
36	George	Crocker	gwillc@nawo.org	North American Water Office		5093 Keats Avenue Lake Elmo MN, 55042 United States	Electronic Service		No	22-416Official
37	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	22-416Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
38	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	22-416Official
39	Thomas	Davis	atdavis1972@outlook.com	-		1161 50th Ave Sherburn MN, 56171 United States	Electronic Service		No	22-416Official
40	Jason	Decker	jason.decker@llojibwe.net	Leech Lake Band of Ojibwe		190 Sailstar Drive NW Cass Lake MN, 56633 United States	Electronic Service		No	22-416Official
41	Bobby	Deschampe	robertdeschampe@grandportage.com	Grand Portage Band of Lake Superior Chippewa		PO Box 428 Grand Portage MN, 55605 United States	Electronic Service		No	22-416Official
42	Randall	Doneen	randall.doneen@state.mn.us		Department of Natural Resources	500 Lafayette Rd, PO Box 25 Saint Paul MN, 55155 United States	Electronic Service		No	22-416Official
43	John	Drawz	jdrawz@fredlaw.com	Fredrikson & Byron, P.A.		Suite 1500 60 South Sixth Street Minneapolis MN, 55402-4400 United States	Electronic Service		No	22-416Official
44	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	22-416Official
45	Adam	Duininck	aduininck@ncsrcc.org	North Central States Regional Council of Carpenters		700 Olive Street St. Paul MN, 55130 United States	Electronic Service		No	22-416Official
46	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	22-416Official
47	Kevin	Dupuis, Sr.	kevindupuis@fdlrez.com			Reservation Business Committee 1720 Big Lake Rd Cloquet MN, 55720 United States	Electronic Service		No	22-416Official
48	Cory	Dutcher	cory.dutcher@ge.com	GE Power and Water		1 River Rd. Bldg. 37-413 Schenectady NY, 12345 United States	Electronic Service		No	22-416Official
49	Jamie	Edwards	jamie.edwards@millelacsband.com	Mille Lacs Band of Ojibwe		43408 Oodena Drive Onamia MN, 56358 United States	Electronic Service		No	22-416Official
50	Kristen	Eide Tollefson	healingsystems69@gmail.com	R-CURE		28477 N Lake Ave Frontenac MN, 55026-1044 United States	Electronic Service		No	22-416Official
51	Matthew	Ellis	mellis@grenergy.com	Great River Energy		null null, null	Electronic Service		No	22-416Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						United States				
52	Kyle	Fairbanks	kyle.fairbanks@llobjibwe.net	Leech Lake Band of Ojibwe		190 Sailstar Drive NW Cass Lake MN, 56633 United States	Electronic Service		No	22-416Official
53	Michael	Fairbanks	michael.fairbanks@whiteearth-nsn.gov	White Earth Reservation Business Committee		PO Box 418 White Earth MN, 56591 United States	Electronic Service		No	22-416Official
54	Kate	Fairman	kate.fairman@state.mn.us		Department of Natural Resources	Box 32 500 Lafayette Rd St. Paul MN, 55155-4032 United States	Electronic Service		No	22-416Official
55	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	22-416Official
56	Eric	Fehlhaber	efehlhaber@dakotaelectric.com	Dakota Electric Association		4300 220th St W Farmington MN, 55024 United States	Electronic Service		No	22-416Official
57	Annie	Felix Gerth	annie.felix-gerth@state.mn.us			Board of Water & Soil Resources 520 Lafayette Rd Saint Paul MN, 55155 United States	Electronic Service		No	22-416Official
58	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	22-416Official
59	Kade	Ferris	kade.ferris@redlakenation.org	Red Lake Region		PO Box 274 Red Lake MN, 56671 United States	Electronic Service		No	22-416Official
60	Leonard	Fineday	leonard.fineday@llobjibwe.net	Leech Lake Bank of Ojibwe		190 Sailstar Drive NW Cass Lake MN, 56633 United States	Electronic Service		No	22-416Official
61	Terri	Finn	terri.goggleye@llobjibwe.net			null null, null United States	Electronic Service		No	22-416Official
62	Henry	Fox	henry.fox@whiteearth-nsn.gov	White Earth Nation		PO Box 418 White Earth MN, 56569 United States	Electronic Service		No	22-416Official
63	Gary	Frazer	gfrazier@mnchippewatribe.org	Minnesota Chippewa Tribe		PO Box 217 Cass Lake MN, 56633 United States	Electronic Service		No	22-416Official
64	Docketing	Fredlaw	docketing@fredlaw.com	Fredrickson & Byron		200 S 6th St, Suite 4000 Minneapolis MN, 55402 United States	Electronic Service		No	22-416Official
65	Daryll	Fuentes	energy@usg.com	USG Corporation		550 W Adams St Chicago IL, 60661 United States	Electronic Service		No	22-416Official
66	Mary Ann	Gagnon	maryanng@grandportage.com	Grand Portage Band of Ojibwe		PO Box 428 Grand Portage MN,	Electronic Service		No	22-416Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						55605 United States				
67	Karen A	Gebhardt	kageb1@gvtel.com			43901 253rd Ave Leonard MN, 56652-4026 United States	Electronic Service		No	22-416Official
68	Shannon	Geshick	shannon.geshick@state.mn.us	Minnesota Indian Affairs Council (MIAC)		null null, null United States	Electronic Service		No	22-416Official
69	Tara	Geshick		Bois Forte Band of Chippewa Tribal Government		5344 Lakeshore Drive Nett Lake MN, 55772 United States	Paper Service		No	22-416Official
70	Todd	Green	todd.a.green@state.mn.us		Minnesota Department of Labor & Industry	443 Lafayette Rd N St. Paul MN, 55155-4341 United States	Electronic Service		No	22-416Official
71	Todd J.	Guerrero	todd.guerrero@kutakrock.com	Kutak Rock LLP		Suite 1750 220 South Sixth Street Minneapolis MN, 55402-1425 United States	Electronic Service		No	22-416Official
72	Jeremy	Hamilton	jhamilton@uppersiouxcommunity-nsn.gov	Upper Sioux Community		Upper Sioux Community PO Box 147 Granite Falls MN, 56241 United States	Electronic Service		No	22-416Official
73	Ashley	Harrison	ashley.harrison@llojibwe.net	Leech Lake Band of Ojibwe		190 Sailstar Dr NW Cass Lake MN, 56633 United States	Electronic Service		No	22-416Official
74	Larry	Hartman	larry.hartman@state.mn.us		Department of Commerce	85 7th Place East, Suite 280 St. Paul MN, 55101 United States	Electronic Service		No	22-416Official
75	Amy	Hastings	amyh@uppersiouxcommunity-nsn.gov	Upper Sioux Community		5722 Travers Lane PO Box 147 Granite Falls MN, 56241 United States	Electronic Service		No	22-416Official
76	Adam	Heinen	aheinen@dakotaelectric.com	Dakota Electric Association		4300 220th St W Farmington MN, 55024 United States	Electronic Service		No	22-416Official
77	Annete	Henkel	mui@mnuutilityinvestors.org	Minnesota Utility Investors		413 Wacouta Street #230 St.Paul MN, 55101 United States	Electronic Service		No	22-416Official
78	Valerie	Herring	vherring@taftlaw.com	Taft Stettinius & Hollister LLP		2200 IDS Center 80 S. Eighth Street Minneapolis MN, 55402 United States	Electronic Service		No	22-416Official
79	Corey	Hintz	chintz@dakotaelectric.com	Dakota Electric Association		4300 220th Street Farmington MN, 55024-9583 United States	Electronic Service		No	22-416Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
80	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	22-416Official
81	Kari	Howe	kari.howe@state.mn.us		DEED	332 Minnesota St, #E200 1ST National Bank Bldg St. Paul MN, 55101 United States	Electronic Service		No	22-416Official
82	Lori	Hoyum	lhoyum@mnpower.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	22-416Official
83	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	22-416Official
84	Faron	Jackson, Sr.	faron.jackson@llojbwe.net			190 Sailstar Drive NW Cass Lake MN, 56633 United States	Electronic Service		No	22-416Official
85	Travis	Jacobson	travis.jacobson@mdu.com	Great Plains Natural Gas Company		400 N 4th St Bismarck ND, 58501 United States	Electronic Service		No	22-416Official
86	Craig	Janezich	craig.janezich@state.mn.us		Public Utilities Commission	121 7th PI E #350 St. Paul MN, 55101 United States	Electronic Service		No	22-416Official
87	Alan	Jenkins	aj@jenkinsatlaw.com	Jenkins at Law		2950 Yellowtail Ave. Marathon FL, 33050 United States	Electronic Service		No	22-416Official
88	Kevin	Jensvold	kevinj@uppersiouxcommunity-nsn.gov	Upper Sioux Community		PO Box 147 Granite Falls MN, 56241-0147 United States	Electronic Service		No	22-416Official
89	Jody	Johnson	jody.johnson@piic.org	Prairie Island Indian Community		5636 Sturgeon Lake Rd Welch MN, 55089 United States	Electronic Service		No	22-416Official
90	Johnny	Johnson	johnny.johnson@piic.org	Prairie Island Indian Community		5636 Sturgeon Lake Road Welch MN, 55089 United States	Electronic Service		No	22-416Official
91	Richard	Johnson	rick.johnson@lawmoss.com	Moss & Barnett		150 S. 5th Street Suite 1200 Minneapolis MN, 55402 United States	Electronic Service		No	22-416Official
92	Scott	Johnson	scott.johnson@ci.medina.mn.us	City of Medina		2052 County Road 24 Medina MN, 55340-9790 United States	Electronic Service		No	22-416Official
93	Sarah	Johnson Phillips	sjphillips@stoel.com	Stoel Rives LLP		33 South Sixth Street	Electronic Service		No	22-416Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						Suite 4200 Minneapolis MN, 55402 United States				
94	Michael	Kaluzniak	mike.kaluzniak@state.mn.us		Public Utilities Commission	Suite 350 121 Seventh Place East St. Paul MN, 55101 United States	Electronic Service		No	22-416Official
95	Nick	Kaneski	nick.kaneski@enbridge.com	Enbridge Energy Company, Inc.		11 East Superior St Ste 125 Duluth MN, 55802 United States	Electronic Service		No	22-416Official
96	Tom	Karas	tomskaras@gmail.com			3171 309th Ave NW Cambridge MN, 55008 United States	Electronic Service		No	22-416Official
97	Bruce	King	brenda@ranww.org	Realtors, Association of Northwestern WI		Suite 3 1903 Keith Street Eau Claire WI, 54701 United States	Electronic Service		No	22-416Official
98	Raymond	Kirsch	raymond.kirsch@state.mn.us		Department of Commerce	85 7th Place E Ste 500 St. Paul MN, 55101 United States	Electronic Service		No	22-416Official
99	Chad	Konickson	chad.konickson@usace.army.mil	U.S.Army Corps of Engineers		332 Minnesota St. Suite E1500 Saint Paul MN, 55101 United States	Electronic Service		No	22-416Official
100	Stacy	Kotch Egstad	stacy.kotch@state.mn.us		MINNESOTA DEPARTMENT OF TRANSPORTATION	395 John Ireland Blvd. St. Paul MN, 55155 United States	Electronic Service		No	22-416Official
101	Michael	Krikava	mkrikava@taftlaw.com	Taft Stettinius & Hollister LLP		2200 IDS Center 80 S 8th St Minneapolis MN, 55402 United States	Electronic Service		No	22-416Official
102	Nicolle	Kupser	nkupser@greatermngas.com	Greater Minnesota Gas, Inc.		1900 Cardinal Ln PO Box 798 Faribault MN, 55021 United States	Electronic Service		No	22-416Official
103	Mike	Laroque	mike.laroque@whiteearth-nsn.gov	White Earth Nation		PO Box 418 White Earth MN, 56591 United States	Electronic Service		No	22-416Official
104	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	22-416Official
105	James D.	Larson	james.larson@avantenergy.com	Avant Energy Services		220 S 6th St Ste 1300 Minneapolis MN, 55402 United States	Electronic Service		No	22-416Official
106	Peder	Larson	plarson@larkinhoffman.com	Larkin Hoffman Daly & Lindgren, Ltd.		8300 Norman Center Drive Suite 1000 Bloomington MN, 55437 United States	Electronic Service		No	22-416Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
107	Dan	Leshner	dlesher@grenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	22-416Official
108	Eric	Lipman	eric.lipman@state.mn.us		Office of Administrative Hearings	PO Box 64620 St. Paul MN, 55164-0620 United States	Electronic Service		No	22-416Official
109	Jason	Loos	jason.loos@centerpointenergy.com	CenterPoint Energy Resources Corp.		505 Nicollet Mall 3rd Floor Minneapolis MN, 55402 United States	Electronic Service		No	22-416Official
110	Susan	Ludwig	sludwig@mnpower.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	22-416Official
111	Vernelle	Lussier	vernelle.lussier@redlakenation.org	Red Lake Nation		15484 Migizi Drive Red Lake MN, 56671 United States	Electronic Service		No	22-416Official
112	Kavita	Maini	kmaini@wi.rr.com	KM Energy Consulting, LLC		961 N Lost Woods Rd Oconomowoc WI, 53066 United States	Electronic Service		No	22-416Official
113	Dawn S	Marsh	dawn_marsh@fws.gov	U.S. Fish & Wildlife Service		Minnesota-Wisconsin Field Offices 4101 American Blvd E Bloomington MN, 55425 United States	Electronic Service		No	22-416Official
114	Shena	Matrious	shena.matrious@millelacsband.com	Mille Lacs Band of Ojibwe		43408 Oodena Drive Onamia MN, 56349 United States	Electronic Service		No	22-416Official
115	April	McCormick	aprlm@gandportage.com	Grand Portage Band of Lake Superior Chippewa		PO Box 428 Grand Portage MN, 55605 United States	Electronic Service		No	22-416Official
116	Brian	Meloy	bmeloy@grenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	22-416Official
117	Joseph	Meyer	joseph.meyer@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	Bremer Tower, Suite 1400 445 Minnesota Street St Paul MN, 55101-2131 United States	Electronic Service		No	22-416Official
118	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	22-416Official
119	Kimberly	Middendorf	kimberly.middendorf@state.mn.us		Office of Administrative Hearings	PO Box 64620 600 Robert St N	Electronic Service		Yes	22-416Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						Saint Paul MN, 55164-0620 United States				
120	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	22-416Official
121	Stacy	Miller	stacy.miller@minneapolismn.gov	City of Minneapolis		350 S. 5th Street Room M 301 Minneapolis MN, 55415 United States	Electronic Service		No	22-416Official
122	David	Moeller	dmoeller@allte.com	Minnesota Power			Electronic Service		No	22-416Official
123	Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP		33 South Sixth St Ste 4200 Minneapolis MN, 55402 United States	Electronic Service		No	22-416Official
124	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	22-416Official
125	Robert	Moyer, Jr.	rmoyer@boisforte-nsn.gov	Bois Forte Band of Chippewa Tribal Government		5344 Lakeshore Drive Nett Lake MN, 55772 United States	Electronic Service		No	22-416Official
126	Colleen	Mueller				22186 State Hwy 4 Paynesville MN, 56362 United States	Paper Service		No	22-416Official
127	Sonny	Myers	smyers@1854treatyauthority.org	1854 Treaty Authority		4428 Haines Rd Duluth MN, 55811-1524 United States	Electronic Service		No	22-416Official
128	Dan	Nelson	dan.nelson@isginc.com	I&S Group		115 E Hickory St Ste 300 Mankato MN, 56001 United States	Electronic Service		No	22-416Official
129	David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency		220 South Sixth Street Suite 1300 Minneapolis MN, 55402 United States	Electronic Service		No	22-416Official
130	Samantha	Norris	samanthanorris@alliantenergy.com	Interstate Power and Light Company		200 1st Street SE PO Box 351 Cedar Rapids IA, 52406-0351 United States	Electronic Service		No	22-416Official
131	Joseph	OBrien	joey.obrien@lowersioux.com			39527 Highway 1 Morton MN, 56270 United States	Electronic Service		No	22-416Official
132	Samantha	Odegard	samanthao@uppersiouxcommunity-nsn.gov			PO Box 147 Granite Falls	Electronic Service		No	22-416Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						MN, 56241 United States				
133	Matthew	Olsen	molsen@otpc.com	Otter Tail Power Company		215 South Cascade Street Fergus Falls MN, 56537 United States	Electronic Service		No	22-416Official
134	Carol A.	Overland	overland@legalelectric.org	Legalelectric - Overland Law Office		1110 West Avenue Red Wing MN, 55066 United States	Electronic Service		No	22-416Official
135	Greg	Palmer	gpalmer@greatermngas.com	Greater Minnesota Gas, Inc.		1900 Cardinal Ln PO Box 798 Faribault MN, 55021 United States	Electronic Service		No	22-416Official
136	Earl	Pendleton	earl.pendleton@lowersioux.com	Lower Sioux Indian Community		39527 Highway 1 Morton MN, 56270 United States	Electronic Service		No	22-416Official
137	Jennifer	Peterson	jjpeterson@mnpower.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	22-416Official
138	Kevin	Peterson	kjp@ibew160.org			1109 Northway Lane NE Rochester MN, 55906 United States	Electronic Service		No	22-416Official
139	Catherine	Phillips	catherine.phillips@wecenergygroup.com	Minnesota Energy Resources		231 West Michigan St Milwaukee WI, 53203 United States	Electronic Service		No	22-416Official
140	Angela	Piner	angela.piner@hdrinc.com	HDR, Inc.		Suite 600 701 Xenia Avenue South Suite 600 Minneapolis MN, 55416 United States	Electronic Service		No	22-416Official
141	Joe	Plumer	joe.plumer@redlakenation.org	Red Lake Nation		15484 Migizi Drive Red Lake MN, 56671 United States	Electronic Service		No	22-416Official
142	Andre	Porter	misolegal@misoenergy.org	MISO		720 City Center Drive Carmel IN, 46032 United States	Electronic Service		No	22-416Official
143	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	22-416Official
144	Robert	Prescott	bob.prescott@lowersioux.com	Lower Sioux Indian Community		39527 Highway 1 Morton MN, 56270 United States	Electronic Service		No	22-416Official
145	Larry	Rebman	larryemls@hotmail.com	EMLS, Inc		PO Box 122 Appleton MN, 56208 United States	Electronic Service		No	22-416Official
146	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,	Electronic Service		Yes	22-416Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						55101-2131 United States				
147	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	22-416Official
148	Margaret	Rheude	margaret_rheude@fws.gov	U.S. Fish and Wildlife Service		Twin Cities Ecological Services Field Office 4101 American Blvd. E. Bloomington MN, 55425 United States	Electronic Service		No	22-416Official
149	Susan	Romans	sromans@allte.com	Minnesota Power		30 West Superior Street Legal Dept Duulth MN, 55802 United States	Electronic Service		No	22-416Official
150	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	22-416Official
151	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	22-416Official
152	Nathaniel	Runke	nrunke@local49.org			611 28th St. NW Rochester MN, 55901 United States	Electronic Service		No	22-416Official
153	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	22-416Official
154	Adam	Savariego	adams@uppersiouxcommunity-nsn.gov	Upper Sioux Community		5722 Travers Lane PO Box 147 Granite Falls MN, 56241 United States	Electronic Service		No	22-416Official
155	Elizabeth	Schmiesing	eschmiesing@winthrop.com	Winthrop & Weinstine, P.A.		225 South Sixth Street Suite 3500 Minneapolis MN, 55402 United States	Electronic Service		No	22-416Official
156	Christine	Schwartz	regulatory.records@xcelenergy.com	Xcel Energy		414 Nicollet Mall FL 7 Minneapolis MN, 55401-1993 United States	Electronic Service		No	22-416Official
157	Jessie	Seim	jessie.seim@piic.org	Prairie Island Indian Community		5636 Sturgeon Lake Rd Welch MN, 55089 United States	Electronic Service		No	22-416Official
158	Darrell	Seki, Sr.	dseki@redlakenation.org			15484 Migizi Drive	Electronic Service		No	22-416Official

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						Red Lake MN, 56671 United States				
159	Will	Seuffert	will.seuffert@state.mn.us		Public Utilities Commission	121 7th PI E Ste 350 Saint Paul MN, 55101 United States	Electronic Service		Yes	22-416Official
160	Janet	Shaddix Eling	jshaddix@janetshaddix.com	Shaddix And Associates		7400 Lyndale Ave S Ste 190 Richfield MN, 55423 United States	Electronic Service		Yes	22-416Official
161	Tom	Slukich	tom@nationalconductor.com	National Conductor Constructors		18119 Hwy 371 North Braiderd MN, 56401 United States	Electronic Service		No	22-416Official
162	Joel	Smith	jsmith@mnchippewatribe.org	Minnesota Chippewa Tribe		PO Box 217 Cass Lake MN, 56633 United States	Electronic Service		No	22-416Official
163	Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.		76 W Kellogg Blvd St. Paul MN, 55102 United States	Electronic Service		No	22-416Official
164	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	22-416Official
165	Roger	Smith, Sr.	rogermsmithsr@fdlrez.com			1720 Big Lake Road Cloquet MN, 55720 United States	Electronic Service		No	22-416Official
166	Adam	Sokolski	adam.sokolski@edf-re.com	EDF Renewable Energy		10 Second Street NE Ste 400 Minneapolis MN, 55410 United States	Electronic Service		No	22-416Official
167	Eugene	Sommers	eugene.sommers@whiteearth-nsn.gov	White Earth Nation		PO BOX 418 White Earth MN, 56591 United States	Electronic Service		No	22-416Official
168	Peggy	Sorum	peggy.sorum@centerpointenergy.com	CenterPoint Energy		505 Nicollet Mall Minneapolis MN, 55402 United States	Electronic Service		No	22-416Official
169	Marie	Spry	mariespry@grandportage.com			PO Box 428 Grand Portage MN, 55605 United States	Electronic Service		No	22-416Official
170	Cheyenne	St. John	cheyenne.stjohn@lowersioux.com	Lower Sioux Tribal Community		39527 Reservation Hwy 1 Morton MN, 56270 United States	Electronic Service		No	22-416Official
171	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	22-416Official
172	Byron E.	Starns	byron.starns@stinson.com	STINSON LLP		50 S 6th St Ste 2600 Minneapolis MN, 55402 United States	Electronic Service		No	22-416Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
173	Kristin	Stastny	kstastny@taftlaw.com	Taft Stettinius & Hollister LLP		2200 IDS Center 80 South 8th Street Minneapolis MN, 55402 United States	Electronic Service		No	22-416Official
174	Toby	Stephens	tobys@grandportage.com	Grand Portage Band of Lake Superior Chippewa		PO BOX 428 Grand Portage MN, 55605 United States	Electronic Service		No	22-416Official
175	Cary	Stephenson	cstephenson@otpc.com	Otter Tail Power Company		215 South Cascade Street Fergus Falls MN, 56537 United States	Electronic Service		No	22-416Official
176	Mark	Strohfus	mstrohfus@grenergy.com	Great River Energy		12300 Elm Creek Boulevard Maple Grove MN, 55369-4718 United States	Electronic Service		No	22-416Official
177	Carl	Strohm	cjsmg@sbcglobal.net	SBC Global		105 East Edgewood Ave Indianapolis IN, 46227 United States	Electronic Service		No	22-416Official
178	James M	Strommen	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered		150 S 5th St Ste 700 Minneapolis MN, 55402 United States	Electronic Service		No	22-416Official
179	Samuel	Strong	sam.strong@redlakenation.org	Red Lake Nation		15484 Migizi Drive Red Lake MN, 56671 United States	Electronic Service		No	22-416Official
180	Tom	Swafford	tswafford@umsi.us	Utility Mapping Services, Inc		3947 E Calvary Rd Suite 103 Duluth MN, 55803 United States	Electronic Service		No	22-416Official
181	Eric	Swanson	eswanson@winthrop.com	Winthrop & Weinstine		225 S 6th St Ste 3500 Capella Tower Minneapolis MN, 55402-4629 United States	Electronic Service		No	22-416Official
182	Todd	Tadych	ttadych@atcllc.com	American Transmission Company LLC		5303 Fen Oak Dr Madison WI, 53718 United States	Electronic Service		No	22-416Official
183	Camille	Tanhoff	kamip@uppersiouxcommunity-nsn.gov	Upper Sioux Community		5722 Travers Lane PO BOX 147 Granite Falls MN, 56241 United States	Electronic Service		No	22-416Official
184	Stuart	Tommerdahl	stommerdahl@otpc.com	Otter Tail Power Company		215 S Cascade St PO Box 496 Fergus Falls MN, 56537 United States	Electronic Service		No	22-416Official
185	Jayme	Trusty	execdir@swrdc.org	SWRDC		2401 Broadway Ave #1 Slayton MN, 56172 United States	Electronic Service		No	22-416Official

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186	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	22-416Official
187	Jen	Tyler	tyler.jennifer@epa.gov	US Environmental Protection Agency		Environmental Planning & Evaluation Unit 77 W Jackson Blvd. Mailstop B-19J Chicago IL, 60604-3590 United States	Electronic Service		No	22-416Official
188	Kodi	Verhalen	kverhalen@taftlaw.com	Taft Stettinius & Hollister LLP		80 S 8th St Ste 2200 Minneapolis MN, 55402 United States	Electronic Service		No	22-416Official
189	Leonard	Wabasha	leonard.wabasha@shakopeedakota.org	Shakopee Mdewakanton Sioux Community		2300 Tiwahe Circle Shakopee MN, 55379 United States	Electronic Service		No	22-416Official
190	Haley	Waller Pitts	hwallerpitts@fredlaw.com	Fredrikson & Byron, P.A.		60 S Sixth St Ste 1500 Minneapolis MN, 55402-4400 United States	Electronic Service		No	22-416Official
191	Caren	Warner	caren.warner@state.mn.us		Department of Commerce	85 7th Place East Suite 280 St. Paul MN, 55101-2198 United States	Electronic Service		No	22-416Official
192	Cynthia	Warzecha	cynthia.warzecha@state.mn.us	Minnesota Department of Natural Resources		500 Lafayette Road Box 25 St. Paul MN, 55155-4040 United States	Electronic Service		No	22-416Official
193	Elizabeth	Wefel	eawefel@flaherty-hood.com	Missouri River Energy Services		525 Park St Ste 470 Saint Paul MN, 55103 United States	Electronic Service		No	22-416Official
194	Heather	Westra	heather.westra@piic.org	Prairie Island Indian Community		5636 Sturgeon Lake Rd Welch MN, 55089 United States	Electronic Service		No	22-416Official
195	Alan	Whipple	sa.property@state.mn.us		Minnesota Department Of Revenue	Property Tax Division 600 N. Robert Street St. Paul MN, 55146-3340 United States	Electronic Service		No	22-416Official
196	Deanna	White	mncwa@cleanwater.org	Clean Water Action & Water Fund of MN		330 S 2nd Ave Ste 420 Minneapolis MN, 55401 United States	Electronic Service		No	22-416Official
197	Noah	White	noah.white@piic.org	Prairie Island Indian Community		5636 Sturgeon Lake Road Welch MN, 55089 United States	Electronic Service		No	22-416Official
198	Steve	White	steve.white@llojibwe.net	Leech Lake Band of Ojibwe		190 Sailstar Drive NW Cass Lake MN, 56633 United States	Electronic Service		No	22-416Official

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199	Cody	Whitebear	cody.whitebear@piic.org	Prairie Island Indian Community		5636 Sturgeon Lake Road Welch MN, 55089 United States	Electronic Service		No	22-416Official
200	Mike	Wilson	mike.wilson@millelacsband.com	Mille Lacs Band of Ojibwe		43408 Oodena Dr Onamia MN, 56359 United States	Electronic Service		No	22-416Official
201	Virgil	Wind	virgil.wind@millelacsband.com	Mille Lacs Band of Ojibwe		43408 Oodena Drive Onamia MN, 56359 United States	Electronic Service		No	22-416Official
202	Joseph	Windler	jwindler@winthrop.com	Winthrop & Weinstine		225 South Sixth Street, Suite 3500 Minneapolis MN, 55402 United States	Electronic Service		No	22-416Official
203	Jonathan	Wolfgram	jonathan.wolfgram@state.mn.us		Office of Pipeline Safety	445 Minnesota St Ste 147 Woodbury MN, 55125 United States	Electronic Service		No	22-416Official
204	Laurie	York	laurie.york@whiteearth-nsn.gov	White Earth Reservation Business Committee		PO Box 418 White Earth MN, 56591 United States	Electronic Service		No	22-416Official
205	Kurt	Zimmerman	kwz@ibew160.org	Local Union #160, IBEW		2909 Anthony Ln St Anthony Village MN, 55418-3238 United States	Electronic Service		No	22-416Official
206	Patrick	Zomer	pat.zomer@lawmoss.com	Moss & Barnett PA		150 S 5th St #1200 Minneapolis MN, 55402 United States	Electronic Service		No	22-416Official