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January 29, 2025



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

**RE: In the Matter of an Investigation into Implementing Changes to the
Renewable Energy Standard and the Newly Created Carbon Free
Standard under Minn. Stat. §216B.1691
Docket No. E999/CI-23-151
Initial Comments**

Dear Mr. Seuffert:

Otter Tail Power Company hereby submits to the Minnesota Public Utilities Commission (Commission) its Initial Comments in the above-referenced matter.

We have electronically filed this document with the Commission and copies have been served on all parties on the attached service list. A Certificate of Service is also enclosed.

Please contact me at 218-739-8989 or njensen@otpcocom if you have any questions regarding this filing.

Sincerely,

/s/ *NATHAN JENSEN*
Nathan Jensen
Manager, Resource Planning

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Enclosures
By electronic filing
c: Service List

**STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION**

**In the Matter of an Investigation
into Implementing Changes to the
Renewable Energy Standard and
the Newly Created Carbon Free
Standard under Minn. Stat.
§216B.1691**

Docket No. E999/CI-23-151

INITIAL COMMENTS

I. INTRODUCTION

Otter Tail Power Company (Otter Tail Power or Company) submits these Comments in response to the Minnesota Public Utilities Commission's (Commission) October 31, 2024, Notice of Initial Comments in the above-referenced docket. The Commission's Notice specified the following topics open for comment:

1. When and how should utilities report preparedness for meeting upcoming CFS requirements?
2. By which criteria and standards should the Commission measure an electric utility's compliance with the CFS?
3. What considerations should the Commission take into account regarding the double counting of Renewable Energy Credits (RECs) to meet multiple requirements?
4. How should net market purchases be counted towards CFS compliance?
5. Are there other issues or concerns related to this matter?

These topics follow prior Commission orders in this docket on related topics concerning the implementation of the CFS.¹ The Company appreciates the opportunity to comment on the ongoing effort to clarify and implement the CFS.

¹ See Order Clarifying Implementation Of Changes To Minn. Stat. 216B.1691 and Directing Additional Comment Period, December 6, 2023; Order Further Clarifying Implementation Of Changes To Minn. Stat. § 216B.1691, April 12, 2024; Order Initiating New Docket and Clarifying "Environmental Justice Area", November 7, 2024; Order Denying Petition for Clarification and Reconsideration, January 23, 2025.

II. COMMENTS

1. When and how should utilities report preparedness for meeting upcoming CFS requirements?

The Company recommends that utilities subject to the resource planning requirements of Minn. Stat. § 216B.2422 report CFS preparedness and compliance in the utility's resource planning docket. Doing so will provide the Commission an assessment of a utility's CFS preparedness on a regular cycle in a comprehensive context. This approach is consistent with Minn Stat. § 216B.1691 subd. 3(a), which requires utilities to report on "plans, activities, and progress" toward the CFS (and RES/SES) in its resource planning filings under Minn. Stat. § 216B.2422 or in a separate report submitted to the Commission every two years, whichever is more frequent. Subd 3(a) requires a reporting utility to include a description of the following when so reporting:

- (1) the status of the utility's renewable energy mix relative to the standard obligations;
- (2) efforts taken to meet the standard obligations;
- (3) any obstacles encountered or anticipated in meeting the standard obligations;
- (4) potential solutions to the obstacles;
- (5) the number of Minnesotans employed to construct facilities designed to meet the utility's standard obligations under this section;
- (6) efforts taken to retain and retrain workers employed at electric generating facilities that the utility has ceased operating or designated to cease operating for new positions constructing or operating facilities used to meet a utility's standard obligation;
- (7) the impacts of facilities designed to meet the utility's standard obligations under this section on environmental justice areas;
- (8) efforts made to increase the diversity of both the utility's workforce and vendors; and
- (9) for an electric utility utilizing renewable energy credits to satisfy any portion of the electric utility's obligations under this section, the following information:
 - (i) the name and location of energy facilities that generated the energy associated with the credits;
 - (ii) the dates when the energy associated with the credits was generated;
 - (iii) the type of fuel that generated the energy associated with the credits; and

- (iv) whether the energy associated with the credits was purchased by the utility purchasing the credits.

Combined with other data typically provided in a resource plan, these data points and descriptions provide the Commission a reasonable basis to assess the utility's preparedness for compliance with the CFS.

2. By which criteria and standards should the Commission measure an electric utility's compliance with the CFS?

This question can be construed broadly to incorporate issues the Commission has indicated will be addressed in docket E-999/CI-24-352, and other issues discussed but not resolved during the Commission September 26, 2024 hearing in this docket. Given the breadth of these issues, the following describes how Otter Tail Power intends to assess its compliance with the CFS, which in turn reflects criteria and standards we believe are relevant to the Commission's assessment of a utility's compliance with the CFS.

The following is a simplified, high-level summary of how the Company anticipates it will calculate and report compliance with the CFS. The Company recognizes that are many issues to be resolved as part of a more detailed calculation:

1. Determine for the calendar year in question the amount of electricity generated or procured by Otter Tail Power from carbon free energy technologies, which is the sum of the following:
 - a. The amount of electricity generated by Otter Tail Power owned carbon free energy technologies, which for foreseeable future means the Company's wind and solar generation resources.
 - b. The amount of electricity produced from carbon free energy technologies procured by Otter Tail Power, which includes the following:
 - i. *Market Purchases* - Calculate the percentage of carbon-free market purchases on an applicable regional transmission organization subregion—using annual energy fuel mix data—as practicable.
 - ii. *Purchases from Specified Resources* - Calculate the percentage of carbon-free energy, when a utility purchases energy from a specified resource such as in the context of a bilateral contract or power purchase agreement, based on the percentage of carbon-free energy generated by the resource.
 - c. Calculate the amount of renewable energy credits generated or procured by Otter Tail Power that were produced by an eligible energy technology

- and applied toward the Company's CFS obligation in the calendar year in question.
2. Determine total retail electric sales to retail customers in Minnesota for the calendar year.
 3. Calculate the percentage of electricity generated or procured from carbon-free energy technologies in relation to total retail electric sales to Minnesota retail customers for the calendar year.

With respect to RECs, the Company anticipates a post calendar year true up process where the Company would acquire any additional RECs necessary for CFS compliance. The Company recognizes that are many issues to be resolved as part of a more detailed calculation.

3. What considerations should the Commission take into account regarding the double counting of Renewable Energy Credits (RECs) to meet multiple requirements?

Otter Tail Power recognizes the double counting of RECs as a significant concern. As a guiding principle we believe the Commission should strive for a simple and non-rigid approach when addressing the use of RECs to satisfy the CFS.

One baseline consideration is Minn. Stat. § 216B. 1691 requires that a REC be used only once, but that REC may be applied to more than one standard obligation under the statute.² Another baseline consideration is that the statute places no express limit on the number of RECs a utility may use toward CFS compliance. The Commission can also consider and coordinate the Commission's approach to this issue with the protections against double counting provided by M-RETS.

Beyond these considerations, the Company believes there is not a double counting problem if a utility applies RECs produced from the utility's own carbon free generation toward the CFS. Conversely if the utility sells those RECs in the MRETs market, the utility could not use those RECs for CFS compliance.

Otter Tail Power recognizes there are likely numerous scenarios where the application of RECs towards CFS compliance may trigger double counting concerns. To the extent these scenarios are raised in comments we will address them in reply comments. As guiding principal, however, it seems clear that the legislature intended

² Subd. 4 provides in part that “[t]he program must permit a credit to be used only once, except that a credit may be used to satisfy both the carbon-free energy standard obligation under subdivision 2g and either the renewable energy standard obligation under subdivision 2a or the solar energy standard obligation under subdivision 2f, if the credit meets the requirements of each subdivision.”

RECs to be an alternative or supplemental means of CFS compliance. Therefore the Company supports simplicity and reasonable flexibility as guiding principles.

4. How should net market purchases be counted towards CFS compliance?

In the context of reporting compliance with the CFS³, this issue appears to require consideration of several issues under Minn. Stat. § 216B.1691 Subd. 2d.(b) (ii) discussed in whole or part in Staff's September 12, 2024 briefing papers, including (1) resources eligible for partial credit, (2) application of a systemwide vs. subregional fuel mix, and the calculation of annual net purchases.⁴

In terms of eligible resources, Otter Tail Power supports construing the CFS in a flexible manner that includes but is not limited to all electricity generation resources provided in the “eligible energy technologies” definition in Minn. Stat. § 216B.1691, Subd. 1(c). The Company recognizes the need for further record development on this issue.

Otter Tail Power also favors use of subregional annual fuel mix data. While it would be reasonable to use a MISO-wide annual fuel mix report, using fuel mix data for the MISO North region provides a more accurate reflection of the market in which we operate. To be clear, the Company favors using an annual data that shows average fuel mix by generation source.

In calculating net purchases, Otter Tail Power assumes that its annual net purchase of wholesale energy refers to annual wholesale energy purchases in excess of annual wholesale energy sales, with the RTO’s subregional fuel mix used to calculate the amount of energy eligible for CFS credit. This appears consistent with the Commission’s provisional guidance. That being said, the Company is open to other interpretations, which it will address in reply comments.

5. Are there other issues or concerns related to this matter?

Not at this time.

³ Otter Tail Power acknowledges Staff’s footnote 2 in the Notice of Comment Period issued on January 22, 2025 in Docket E-999/CI-24-352 where one of the topics open for comment is “[t]he definition and calculation of net market purchases” in the context of the question “[w]hat actions, if any, should the Commission take to establish the criteria and standards necessary for utilities to calculate partial compliance with the Carbon Free Standard?”

⁴ Minn. Stat. § 216B.1691, Subd. 2d.(b) (ii) references “an electric utility’s annual purchases from a regional transmission organization net of the electric utility’s sales to the regional transmission organization, but only for the percentage of annual net purchases that is carbon-free, which percentage the commission must calculate based on the regional transmission organization’s systemwide annual fuel mix or an applicable subregional fuel mix.”

Respectfully submitted,

OTTER TAIL POWER COMPANY

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CERTIFICATE OF SERVICE

**RE: In the Matter of an Investigation into Implementing Changes to the
Renewable Energy Standard and the Newly Created Carbon Free
Standard under Minn. Stat. §216B.1691
Docket No. E999/CI-23-151**

I, Kim Ward, hereby certify that I have this day served a copy of the following, or a summary thereof, on Will Seuffert and Sharon Ferguson by e-filing, and to all other persons on the attached service list by electronic service or by First Class Mail.

**Otter Tail Power Company
Initial Comments**

Dated this **29th** day of **January, 2025**.

/s/ KIM WARD

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84	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	23-151Official
85	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	23-151Official
86	Terri	Finn	terri.goggleye@llojibwe.net		null null, null United States		Electronic Service		No	23-151Official
87	Mike	Fiterman	mikefiterman@libertydiversified.com	Liberty Diversified International		5600 N Highway 169 Minneapolis MN, 55428-3096 United States	Electronic Service		No	23-151Official
88	Christine	Fox	cfox@itasca-mantrap.com	Itasca-Mantrap Coop. Electric Assn.		PO Box 192 Park Rapids MN, 56470 United States	Electronic Service		No	23-151Official
89	Lucas	Franco	lfranco@liunagroc.com	LIUNA		81 Little Canada Rd E Little Canada MN, 55117 United States	Electronic Service		No	23-151Official
90	Ronald J.	Franz	ronald.franz@dairylandpower.com	Dairyland Power Cooperative		3200 East Ave S PO Box 817 La Crosse WI, 54602-0817 United States	Electronic Service		No	23-151Official
91	Nathan	Franzen	nathan@nationalgridrenewables.com	Geronimo Energy, LLC		8400 Normandale Lake Blvd Ste 1200 Bloomington MN, 55437 United States	Electronic Service		No	23-151Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
92	Gary	Frazer	gfrazer@mnchippewatribe.org	Minnesota Chippewa Tribe		PO Box 217 Cass Lake MN, 56633 United States	Electronic Service		No	23-151Official
93	Barb	Freese	bfreese@mncenter.org	Minnesota Center for Environmental Advocacy		1919 University Ave W Ste 515 Saint Paul MN, 55104-3435 United States	Electronic Service		No	23-151Official
94	Christopher	Friez	christopher.friez@nacco.com	NACCO Natural Resources/North American Coal		918 E. Divide Ave., Suite 200 Bismarck ND, 58501 United States	Electronic Service		No	23-151Official
95	Stacey	Fujii	sfujii@grenergy.com	Great River Energy		12300 Elm Creek Boulevard Maple Grove MN, 55369-4718 United States	Electronic Service		No	23-151Official
96	Jessica	Fyhrie	jfyhrie@otpco.com	Otter Tail Power Company		PO Box 496 Fergus Falls MN, 56538-0496 United States	Electronic Service		Yes	23-151Official
97	Edward	Garvey	garveyed@aol.com	Residence		32 Lawton St Saint Paul MN, 55102 United States	Electronic Service		No	23-151Official
98	Benjamin	Gerber	ben@mrets.org	Midwest Renewable Energy Tracking System		60 South Sixth Street Suite 2800 Minneapolis MN, 55402 United States	Electronic Service		No	23-151Official
99	David P.	Geschwind	dp.geschwind@smpma.org	Southern Minnesota Municipal Power Agency		500 First Avenue SW Rochester MN, 55902 United States	Electronic Service		No	23-151Official
100	Shannon	Geshick	shannon.geshick@state.mn.us	Minnesota Indian Affairs Council (MIAC)		null null, null United States	Electronic Service		No	23-151Official
101	Allen	Gleckner	gleckner@fresh-energy.org	Fresh Energy		408 St. Peter Street Ste 350 Saint Paul MN, 55102 United States	Electronic Service		No	23-151Official
102	Jenny	Glumack	jenny@mrea.org	Minnesota Rural Electric Association		11640 73rd Ave N Maple Grove MN, 55369 United States	Electronic Service		No	23-151Official
103	Julie	Goehring	julie@redriverbasincommission.org			708 70 Ave NW Moorhead MN, 56560 United States	Electronic Service		No	23-151Official
104	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	23-151Official
105	Tessa	Haagenson	tessa.haagenson@connexusenergy.com	Connexus Energy		14601 Ramsey Blvd NW Ramsey MN, 55303 United States	Electronic Service		No	23-151Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
106	Jeffrey	Haase	jhaase@greenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	23-151Official
107	Hal	Halpern	halhalpern@clpower.com	Cooperative Light & Power		1554 Hwy 2 P0 Box 69 Two Harbors MN, 55616 United States	Electronic Service		No	23-151Official
108	Jeremy	Hamilton	jhamilton@uppersiouxcommunity-nsn.gov	Upper Sioux Community		Upper Sioux Community PO Box 147 Granite Falls MN, 56241 United States	Electronic Service		No	23-151Official
109	David A.	Hansen	hansen@federatedrea.coop	Federated Rural Electric Association		77100 U.S. Highway 71 PO Box 69 Jackson MN, 56143 United States	Electronic Service		No	23-151Official
110	James	Hartson				59931 300th Street Waltham MN, 55982 United States	Paper Service		No	23-151Official
111	Amy	Hastings	amyh@uppersiouxcommunity-nsn.gov	Upper Sioux Community		5722 Travers Lane PO Box 147 Granite Falls MN, 56241 United States	Electronic Service		No	23-151Official
112	Erik	Hatlestad	erik@cureriver.org			117 1st St Montevideo MN, 56265 United States	Electronic Service		No	23-151Official
113	Kim	Havey	kim.havey@minneapolismn.gov	City of Minneapolis		350 South 5th Street, Suite 315M Minneapolis MN, 55415 United States	Electronic Service		No	23-151Official
114	Philip	Hayet	phayet@jkenn.com	J. Kennedy and Associates, Inc.		570 Colonial Park Drive Suite 305 Roswell GA, 30075-3770 United States	Electronic Service		No	23-151Official
115	Adam	Heinen	aheinen@dakotaelectric.com	Dakota Electric Association		4300 220th St W Farmington MN, 55024 United States	Electronic Service		No	23-151Official
116	Annette	Henkel	mui@mutilityinvestors.org	Minnesota Utility Investors		413 Wacouta Street #230 St.Paul MN, 55101 United States	Electronic Service		No	23-151Official
117	Jessy	Hennesy	jessy.hennesy@avantenergy.com	Avant Energy		220 S. Sixth St. Ste 1300 Minneapolis MN, 55402 United States	Electronic Service		No	23-151Official
118	Kristin	Henry	kristin.henry@sierraclub.org	Sierra Club		2101 Webster St Ste 1300 Oakland CA, 94612 United States	Electronic Service		No	23-151Official
119	Benjamin	Hertz	bhertz@bepc.com	Basin Electric Power Cooperative		1717 E Interstate Ave Bismarck ND, 58503 United States	Electronic Service		Yes	23-151Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
120	Holly	Hinman	holly.r.hinman@xcelenergy.com	Xcel Energy		414 Nicollet Mall, 7th Floor Minneapolis MN, 55401 United States	Electronic Service		No	23-151Official
121	Joe	Hoffman	ja.hoffman@smmpa.org	SMMPA		500 First Ave SW Rochester MN, 55902-3303 United States	Electronic Service		No	23-151Official
122	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	23-151Official
123	Ronald	Horman	rhorman@redwoodelectric.com	Redwood Electric Cooperative		60 Pine Street Clements MN, 56224 United States	Electronic Service		No	23-151Official
124	Rick	Horton	rhorton@minnesotaforests.com	Minnesota Forest Industries		324 West Superior Street 903 Medical Arts Building Duluth MN, 55802 United States	Electronic Service		No	23-151Official
125	Robbie	Howe	robbie.howe@llojibwe.net	Leech Lake Band of Ojibwe		190 Sailstar Drive NW Cass Lake MN, 56633 United States	Electronic Service		No	23-151Official
126	John	Ihle	ljihle@rrt.net	PlainStates Energy LLC		27451 S Hwy 34 Barnesville MN, 56514 United States	Electronic Service		No	23-151Official
127	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	23-151Official
128	Faron	Jackson, Sr.	faron.jackson@llojibwe.net			190 Sailstar Drive NW Cass Lake MN, 56633 United States	Electronic Service		No	23-151Official
129	Casey	Jacobson	cjacobsen@bepc.com	Basin Electric Power Cooperative		1717 East Interstate Avenue Bismarck ND, 58501 United States	Electronic Service		No	23-151Official
130	Justin	Jahnz	justin.jahnz@ecemn.com	East Central Energy		412 Main Ave N Braham MN, 55006 United States	Electronic Service		No	23-151Official
131	Alan	Jenkins	aj@jenkinsatlaw.com	Jenkins at Law		2950 Yellowtail Ave. Marathon FL, 33050 United States	Electronic Service		No	23-151Official
132	Nathan	Jensen	njensen@otpco.com	Otter Tail Power Company		215 S. Cascade St. Fergus Falls MN, 56537 United States	Electronic Service		No	23-151Official
133	Kevin	Jensvold	kevinj@uppersiouxcommunity-nsn.gov	Upper Sioux Community		PO Box 147 Granite Falls MN, 56241-	Electronic Service		No	23-151Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						0147 United States				
134	Annette	Johnson	annette.johnson@redlakenation.org	Red Lake Nation		15484 Migizi Drive Red Lake MN, 56671 United States	Electronic Service	No	23-151Official	
135	Jody	Johnson	jody.johnson@piic.org	Prairie Island Indian Community		5636 Sturgeon Lake Rd Welch MN, 55089 United States	Electronic Service	No	23-151Official	
136	Johnny	Johnson	johnny.johnson@piic.org	Prairie Island Indian Community		5636 Sturgeon Lake Road Welch MN, 55089 United States	Electronic Service	No	23-151Official	
137	Richard	Johnson	rick.johnson@lawmoss.com	Moss & Barnett		150 S. 5th Street Suite 1200 Minneapolis MN, 55402 United States	Electronic Service	No	23-151Official	
138	Sarah	Johnson Phillips	sjphillips@stoel.com	Stoel Rives LLP		33 South Sixth Street Suite 4200 Minneapolis MN, 55402 United States	Electronic Service	No	23-151Official	
139	Nate	Jones	njones@hcpd.com	Heartland Consumers Power		PO Box 248 Madison SD, 57042 United States	Electronic Service	No	23-151Official	
140	Nick	Kaneski	nick.kaneski@enbridge.com	Enbridge Energy Company, Inc.		11 East Superior St Ste 125 Duluth MN, 55802 United States	Electronic Service	No	23-151Official	
141	Veda	Kanitz	vmkanitz@gmail.com			null null, null United States	Electronic Service	No	23-151Official	
142	Jenny	Kartes	jkartes@arrowhead.coop	Arrowhead Electric Cooperative, Inc.(P)		PO Box 39 5401 W Hwy 61 Lutsen MN, 55612 United States	Electronic Service	No	23-151Official	
143	David	Kempf	dkempf@grenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service	No	23-151Official	
144	William	Kenworthy	will@votesolar.org			1 South Dearborn St Ste 2000 Chicago IL, 60603 United States	Electronic Service	No	23-151Official	
145	Becky	Kern	bkern@bepc.com	Basin Electric Power Cooperative		1717 E Interstate Ave Bismarck ND, 58501 United States	Electronic Service	Yes	23-151Official	
146	Samuel B.	Ketchum	sketchum@kennedy-graven.com	Kennedy & Graven, Chartered		150 S 5th St Ste 700 Minneapolis MN, 55402 United States	Electronic Service	No	23-151Official	
147	Nazir	Khan	nazir@mnejtable.org	Minnesota Environmental Justice Table		2720 E 22nd St Minneapolis MN, 55406 United States	Electronic Service	No	23-151Official	

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
148	Hudson	Kingston	hudson@curemn.org			PO Box 712 Ely MN, 55731 United States	Electronic Service		No	23-151Official
149	Kate	Knuth	kate.knuth@gmail.com			2347 14th Terrace NW New Brighton MN, 55112 United States	Electronic Service		No	23-151Official
150	Frank	Kohlasch	frank.kohlasch@state.mn.us		Minnesota Pollution Control Agency	520 Lafayette Rd N. St. Paul MN, 55155 United States	Electronic Service		No	23-151Official
151	Brian	Kolbinger	brian@beckertownship.org	Becker Township Board		PO Box 248 12165 Hancock St Becker MN, 55308 United States	Electronic Service		No	23-151Official
152	Seth	Koneczny	st.koneczny@smmpa.org	SMMPA		500 First Avenue, SW Rochester MN, 55902- 3303 United States	Electronic Service		No	23-151Official
153	Brian	Krambeer	bkrambeer@mienergy.coop	MiEnergy Cooperative		PO Box 626 31110 Cooperative Way Rushford MN, 55971 United States	Electronic Service		No	23-151Official
154	Randy	Kramer	rlkramer89@gmail.com	Water and Soil Resources Board		42808 Co. Rd. 11 Bird Island MN, 55310 United States	Electronic Service		No	23-151Official
155	Allen	Krug	allen.krug@xcelenergy.com	Xcel Energy		414 Nicollet Mall-7th fl Minneapolis MN, 55401 United States	Electronic Service		No	23-151Official
156	Kay	Kuhlmann	teri.swanson@ci.red-wing.mn.us	City Of Red Wing		315 West Fourth Street Red Wing MN, 55066 United States	Electronic Service		No	23-151Official
157	Brenda	Kyle	bkyle@stpaulchamber.com	St. Paul Area Chamber of Commerce		401 N Robert Street Suite 150 St Paul MN, 55101 United States	Electronic Service		No	23-151Official
158	Therese	LaCanne	tlacanne@greenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	23-151Official
159	Matthew	Lacey	mlacey@greenergy.com	Great River Energy		12300 Elm Creek Boulevard Maple Grove MN, 55369- 4718 United States	Electronic Service		No	23-151Official
160	Becky	Lammi	cityclerk@ci.aurora.mn.us	City of Aurora		16 W 2nd Ave N PO Box 160 Aurora MN, 55705 United States	Electronic Service		No	23-151Official
161	Carmel	Laney	carmel.laney@stoel.com	Stoel Rives LLP		33 South Sixth Street Suite 4200 Minneapolis	Electronic Service		No	23-151Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						MN, 55402 United States				
162	Arthur	LaRose	arthur.larose@llojibwe.net	Leech Lake Band of Ojibwe		190 Sailstar Drive NW Cass Lake MN, 56633 United States	Electronic Service		No	23-151Official
163	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	23-151Official
164	Emily	Larson	elarson@duluthmn.gov	City of Duluth		411 W 1st St Rm 403 Duluth MN, 55802 United States	Electronic Service		No	23-151Official
165	James D.	Larson	james.larson@avantenergy.com	Avant Energy Services		220 S 6th St Ste 1300 Minneapolis MN, 55402 United States	Electronic Service		No	23-151Official
166	Mark	Larson	mlarson@meeker.coop	Meeker Coop Light & Power Assn		1725 Highway 12 E Ste 100 Litchfield MN, 55355 United States	Electronic Service		No	23-151Official
167	Peder	Larson	plarson@larkinhoffman.com	Larkin Hoffman Daly & Lindgren, Ltd.		8300 Norman Center Drive Suite 1000 Bloomington MN, 55437 United States	Electronic Service		No	23-151Official
168	Rachel	Leonard	rachel.leonard@ci.monticello.mn.us	City of Monticello		505 Walnut St Ste 1 Monticello MN, 55362 United States	Electronic Service		No	23-151Official
169	Dan	Lesher	dlesher@grenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	23-151Official
170	Annie	Levenson Falk	anniefl@cubminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota Street, Suite W1360 St. Paul MN, 55101 United States	Electronic Service		No	23-151Official
171	Jesse	Levine	jesse_levine@afandpa.org			1101 K St NW Suite 700 Washington DC, 20005 United States	Electronic Service		No	23-151Official
172	Amy	Liberkowski	amy.a.liberkowski@xcelenergy.com	Xcel Energy		414 Nicollet Mall 7th Floor Minneapolis MN, 55401-1993 United States	Electronic Service		No	23-151Official
173	Eric	Lindberg	elindberg@mncenter.org	Minnesota Center for Environmental Advocacy		1919 University Avenue West Suite 515 Saint Paul MN, 55104-3435 United States	Electronic Service		No	23-151Official
174	Eric	Lipman	eric.lipman@state.mn.us	Office of Administrative Hearings		PO Box 64620 St. Paul MN, 55164-0620 United States	Electronic Service		Yes	23-151Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
175	Michelle	Lommel	mlommel@greenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	23-151Official
176	Bob	Long	rlong@larkinhoffman.com	Larkin Hoffman (Silicon Energy)		1500 Wells Fargo Plaza 7900 Xerxes Ave S Bloomington MN, 55431 United States	Electronic Service		No	23-151Official
177	Andrea	Lovoll	alovoll@mnejtable.org	Minnesota Environmental Justice Table		2720 E 22nd St. Minneapolis MN, 55406 United States	Electronic Service		No	23-151Official
178	Nicole	Luckey	nluckey@invenergylc.com	Invenergy LLC		1 S. Wacker Suite 1800 Chicago IL, 60606 United States	Electronic Service		No	23-151Official
179	Susan	Ludwig	sludwig@mnpower.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	23-151Official
180	Robert	Lunder	robert.lunder@mdu.com	Montana-Dakota Utilities (ET)		400 N 4th St Bismarck ND, 58501 United States	Electronic Service		No	23-151Official
181	Alice	Madden	alice@communitypowermn.org	Community Power		2720 E 22nd St Minneapolis MN, 55406 United States	Electronic Service		No	23-151Official
182	Scott	Magnuson	smagnuson@bpu.org	Brainerd Public Utilities		8027 Highland Scenic Rd Baxter MN, 56425 United States	Electronic Service		No	23-151Official
183	Kavita	Maini	kmaini@wi.rr.com	KM Energy Consulting, LLC		961 N Lost Woods Rd Oconomowoc WI, 53066 United States	Electronic Service		No	23-151Official
184	Emily	Marshall	emarshall@mojlaw.com	Miller O'Brien Jensen, PA		120 S. 6th Street Suite 2400 Minneapolis MN, 55402 United States	Electronic Service		No	23-151Official
185	Mary	Martinka	mary.a.martinka@xcelenergy.com	Xcel Energy Inc		414 Nicollet Mall 7th Floor Minneapolis MN, 55401 United States	Electronic Service		No	23-151Official
186	Gregg	Mast	gmast@cleanenergyeconomymn.org	Clean Energy Economy Minnesota		4808 10th Avenue S Minneapolis MN, 55417 United States	Electronic Service		No	23-151Official
187	Shena	Matrious	shena.matrious@millelacsband.com	Mille Lacs Band of Ojibwe		43408 Oodena Drive Onamia MN, 56349 United States	Electronic Service		No	23-151Official

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188	Daryl	Maxwell	dmaxwell@hydro.mb.ca	Manitoba Hydro		360 Portage Ave FL 16 PO Box 815, Station Main Winnipeg MB, R3C 2P4 Canada	Electronic Service		No	23-151Official
189	Tim	McCarthy	tim.mccarthy@siouxvalleyenergy.com	Sioux Valley Southwestern Electric Cooperative, Inc. d/b/a Sioux Valley Energy		null null, null United States	Electronic Service		No	23-151Official
190	Scot	McClure	scotmcclure@alliantenergy.com	Interstate Power And Light Company		4902 N Biltmore Ln PO Box 77007 Madison WI, 53707-1007 United States	Electronic Service		No	23-151Official
191	April	McCormick	aprlm@grandportage.com	Grand Portage Band of Lake Superior Chippewa		PO Box 428 Grand Portage MN, 55605 United States	Electronic Service		No	23-151Official
192	Jess	McCullough	jmcullough@mnpower.com	Minnesota Power		30 W Superior St Duluth MN, 55802 United States	Electronic Service		No	23-151Official
193	Sara G	McGrane	smcgrane@felhaber.com	Felhaber Larson		220 S 6th St Ste 2200 Minneapolis MN, 55420 United States	Electronic Service		No	23-151Official
194	Natalie	McIntire	natalie.mcintire@gmail.com	Wind on the Wires		570 Asbury St Ste 201 Saint Paul MN, 55104-1850 United States	Electronic Service		No	23-151Official
195	Harvey	McMahon	hmcMahon@otpco.com	Otter Tail Power Company		215 South Cascade Street Fergus Falls MN, 56537 United States	Electronic Service		No	23-151Official
196	Taylor	McNair	taylor@gridlab.org			668 Capp Street San Francisco CA, 94110 United States	Electronic Service		No	23-151Official
197	Ronald	Meier	rmeier@mcleodcoop.com	Mcleod Cooperative Power		3515 11th St East Glencoe MN, 55336 United States	Electronic Service		No	23-151Official
198	Melanie	Mesko Lee	melanie.lee@burnsvillemn.gov	City of Burnsville		100 Civic Center Parkway Burnsville MN, 55337-3867 United States	Electronic Service		No	23-151Official
199	Peder	Mewis	pmewis@cleangridalliance.org	Clean Grid Alliance		570 Asbury St. St. Paul MN, 55104 United States	Electronic Service		No	23-151Official
200	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,	Electronic Service		No	23-151Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						55101-2131 United States				
201	Valentina	Mgeni	valentina.mgeni@pic.org	Prairie Island Indian Community		Prairie Island Indian Community 5636 Sturgeon Lake Road Welch MN, 55089 United States	Electronic Service	No	23-151Official	
202	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	23-151Official	
203	Stacy	Miller	stacy.miller@minneapolismn.gov	City of Minneapolis		350 S. 5th Street Room M 301 Minneapolis MN, 55415 United States	Electronic Service	No	23-151Official	
204	David	Moeller	dmoeller@allete.com	Minnesota Power			Electronic Service	No	23-151Official	
205	Dalene	Monsebroten	dalene.monsebroten@nmpagency.com	Northern Municipal Power Agency		123 2nd St W Thief River Falls MN, 56701 United States	Electronic Service	No	23-151Official	
206	Sarah	Mooradian	sarah@curemn.org	CURE		117 South 1st Street Montevideo MN, 56265 United States	Electronic Service	No	23-151Official	
207	Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP		33 South Sixth St Ste 4200 Minneapolis MN, 55402 United States	Electronic Service	No	23-151Official	
208	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	23-151Official	
209	David	Morrison, Sr.	david.morrison@boisforte-nsn.gov	Bois Forte Band of Chippewa		Bois Forte Tribal Government 5344 Lakeshore Drive Nett Lake MN, 55772 United States	Electronic Service	No	23-151Official	
210	Evan	Mulholland	emulholland@mncenter.org	Minnesota Center for Environmental Advocacy		1919 University Ave W Ste 515 Saint Paul MN, 55101 United States	Electronic Service	No	23-151Official	
211	Alan	Muller	alan@greendel.org	Energy & Environmental Consulting		1110 West Avenue Red Wing MN, 55066 United States	Electronic Service	No	23-151Official	

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212	Sonny	Myers	smyers@1854treatyauthority.org	1854 Treaty Authority		4428 Haines Rd Duluth MN, 55811-1524 United States	Electronic Service		No	23-151Official
213	Ben	Nelson	benn@cmpasgroup.org	CMMPA		459 South Grove Street Blue Earth MN, 56013 United States	Electronic Service		No	23-151Official
214	Carl	Nelson	cnelson@mncee.org	Center for Energy and Environment		212 3rd Ave N Ste 560 Minneapolis MN, 55401 United States	Electronic Service		No	23-151Official
215	Deb	Nelson	dnelson@grenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	23-151Official
216	David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency		220 South Sixth Street Suite 1300 Minneapolis MN, 55402 United States	Electronic Service		No	23-151Official
217	Duane	Ninneman	duane@cureriver.org	Clean Up the River Environment		117 South 1st St Montevideo MN, 56265 United States	Electronic Service		No	23-151Official
218	Michael	Noble	noble@fresh-energy.org	Fresh Energy		408 Saint Peter St Ste 350 Saint Paul MN, 55102 United States	Electronic Service		No	23-151Official
219	Rolf	Nordstrom	rnordstrom@gpisd.net	Great Plains Institute		2801 21ST AVE S STE 220 Minneapolis MN, 55407-1229 United States	Electronic Service		No	23-151Official
220	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	23-151Official
221	M. William	O'Brien	bobrien@mojlaw.com	Miller O'Brien Jensen, P.A.		120 S 6th St Ste 2400 Minneapolis MN, 55402 United States	Electronic Service		No	23-151Official
222	Ric	O'Connell	ric@gridlab.org	GridLab		2120 University Ave Berkeley CA, 94704 United States	Electronic Service		No	23-151Official
223	Joseph	OBrien	joey.obrien@lowersioux.com			39527 Highway 1 Morton MN, 56270 United States	Electronic Service		No	23-151Official
224	Matthew	Olsen	molsen@otpco.com	Otter Tail Power Company		215 South Cascade Street Fergus Falls MN, 56537 United States	Electronic Service		No	23-151Official
225	Russell	Olson	rolson@hcpd.com	Heartland Consumers Power District		PO Box 248 Madison SD, 57042-0248 United States	Electronic Service		No	23-151Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
226	Debra	Opatz	dopatz@otpco.com	Otter Tail Power Company		215 South Cascade Street Fergus Falls MN, 56537 United States	Electronic Service		No	23-151Official
227	Mikayla	Osterman	mosterman@otpco.com	Otter Tail Power Company		215 S Cascade St PO Box 496 Fergus Falls MN, 56537 United States	Electronic Service		No	23-151Official
228	Jamie	Overgaard	jovergaard@minnkota.com	Minnkota Power Cooperative, Inc.		5301 32nd Ave S Grand Forks ND, 58201 United States	Electronic Service		No	23-151Official
229	Carol A.	Overland	overland@legalelectric.org	Legalelectric - Overland Law Office		1110 West Avenue Red Wing MN, 55066 United States	Electronic Service		No	23-151Official
230	Gregory	Padden	gpadden@greenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	23-151Official
231	Jessica	Palmer Denig	jessica.palmer-denig@state.mn.us	Office of Administrative Hearings		600 Robert St N PO Box 64620 St. Paul MN, 55164 United States	Electronic Service		No	23-151Official
232	Marsha	Parlow	mparlow@greenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	23-151Official
233	Priti	Patel	ppatel@greenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369-4718 United States	Electronic Service		No	23-151Official
234	Gerad	Paul	gpaul@minnkota.com	Minnkota Power Cooperative		5301 32nd Ave S Grand Forks ND, 58201 United States	Electronic Service		No	23-151Official
235	Earl	Pendleton	earl.pendleton@lowersioux.com	Lower Sioux Indian Community		39527 Highway 1 Morton MN, 56270 United States	Electronic Service		No	23-151Official
236	Mary Beth	Peranteau	mperanteau@fredlaw.com	Fredrikson & Byron, P.A.		44 East Mifflin Street Suite 1000 Madison WI, 53703 United States	Electronic Service		No	23-151Official
237	Thom	Petersen	thom.petersen@state.mn.us	Minnesota Department of Agriculture		625 North Robert St Saint Paul MN, 55155 United States	Electronic Service		No	23-151Official
238	Luke	Peterson	luke.peterson@hpuc.com	Hibbing Public Utilities Commission		1902 Sixth Ave E Hibbing MN, 55746 United States	Electronic Service		No	23-151Official
239	Neil	Peterson	info@nclcb.org	Northern Counties Land Use Coordinating Board		null null, null United States	Electronic Service		No	23-151Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
240	DONNA	PICKARD	dpickard@aladdinsolar.com	Genie Solar Support Services		1215 Lilac Lane Excelsior MN, 55331 United States	Electronic Service		No	23-151Official
241	Gordon	Pietsch	gpietsch@grenergy.com	Great River Energy		12300 Elm Creek Blvd. Maple Grove MN, 55369-4718 United States	Electronic Service		No	23-151Official
242	Joe	Plumer	joe.plumer@redlakenation.org	Red Lake Nation		15484 Migizi Drive Red Lake MN, 56671 United States	Electronic Service		No	23-151Official
243	J.	Porter	greg.porter@nngco.com	Northern Natural Gas Company		1111 South 103rd St Omaha NE, 68124 United States	Electronic Service		No	23-151Official
244	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	23-151Official
245	Robert	Prescott	bob.prescott@lowersioux.com	Lower Sioux Indian Community		39527 Highway 1 Morton MN, 56270 United States	Electronic Service		No	23-151Official
246	David	Raatz	draatz@bepc.com	Basin Electric Power Cooperative		1717 East Interstate Avenue Bismarck ND, 58501 United States	Electronic Service		No	23-151Official
247	John C.	Reinhardt		Laura A. Reinhardt		3552 26th Ave S Minneapolis MN, 55406 United States	Paper Service		No	23-151Official
248	Victoria	Reinhardt	victoria.reinhardt@co.ramsey.mn.us	Partnership on Waste and Energy		Ramsey County Board Office 15 W. Kellogg Blvd., Ste. 220 St. Paul MN, 55102 United States	Electronic Service		No	23-151Official
249	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	23-151Official
250	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	23-151Official
251	John	Richards	johnrichards@nweco.com	Northwestern Wisconsin Electric Company		104 S. Pine St. Grantsburg WI, 54840 United States	Electronic Service		No	23-151Official
252	Greg	Ridderbusch	greg.ridderbusch@connexusenergy.com	Connexus Energy		14601 Ramsey Boulevard Ramsey MN, 55303 United States	Electronic Service		No	23-151Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
253	Susan	Romans	sromans@allete.com	Minnesota Power		30 West Superior Street Legal Dept Duluth MN, 55802 United States	Electronic Service		No	23-151Official
254	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	23-151Official
255	Alan	Roy	alan.roy@whiteearth-nsn.gov	White Earth Nation		White Earth Tribal Headquarters 35500 Eagle View Road Ogema MN, 56569 United States	Electronic Service		No	23-151Official
256	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	23-151Official
257	Nathaniel	Runke	nrunke@local49.org			611 28th St. NW Rochester MN, 55901 United States	Electronic Service		No	23-151Official
258	Zachary	Ruzycki	zruzycki@greenergy.com	Great River Energy		12300 Elm Creek Boulevard Maple Grove MN, 55369 United States	Electronic Service		No	23-151Official
259	Mike	Saer	msaer@greenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	23-151Official
260	Robert K.	Sahr	bsahr@eastriver.coop	East River Electric Power Cooperative		P.O. Box 227 Madison SD, 57042 United States	Electronic Service		No	23-151Official
261	Todd	Sailer		Minnetonka Power Cooperative		5301 32nd Ave. S Grand Forks ND, 58201 United States	Paper Service		No	23-151Official
262	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	23-151Official
263	Joseph L	Sathe	jsathe@kennedy-graven.com	Kennedy & Graven, Chartered		150 S 5th St Ste 700 Minneapolis MN, 55402 United States	Electronic Service		No	23-151Official
264	Adam	Savariego	adams@uppersiouxcommunity-nsn.gov	Upper Sioux Community		5722 Travers Lane PO Box 147 Granite Falls MN, 56241 United States	Electronic Service		No	23-151Official
265	John	Saxhaug	john_saxhaug@yahoo.com			3940 Harriet Ave Minneapolis	Electronic Service		No	23-151Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						MN, 55409 United States				
266	Jean	Schafer	jeans@bepc.com	Basin Electric Power Cooperative		1717 E Interstate Ave Bismarck ND, 58501 United States	Electronic Service		No	23-151Official
267	Jeff	Schneider	jeff.schneider@ci.red-wing.mn.us	City of Red Wing		315 West 4th Street Red Wing MN, 55066 United States	Electronic Service		No	23-151Official
268	Mark	Schoennauer	markwsch@hotmail.com			607 19th St NW Apt 17 Rochester MN, 55901 United States	Electronic Service		No	23-151Official
269	Kay	Schraeder	kschraeder@minnkota.com	Minnkota Power		5301 32nd Ave S Grand Forks ND, 58201 United States	Electronic Service		No	23-151Official
270	Kathleen	Schuler	keschuler47@gmail.com			1520 10th Ave S #2 Minneapolis MN, 55404 United States	Electronic Service		No	23-151Official
271	Robert H.	Schulte	rhs@schulteassociates.com	Schulte Associates LLC		1742 Patriot Rd Northfield MN, 55057 United States	Electronic Service		No	23-151Official
272	J.P.	Schumacher	jps@mrenergy.com	Missouri River Energy Services		null null, null United States	Electronic Service		No	23-151Official
273	Kevin	Schumacher	kevin@mrets.org	Midwest Renewable Energy Tracking System		null null, null United States	Electronic Service		No	23-151Official
274	Ronald J.	Schwartau	rschwartau@noblesce.com	Nobles Electric Cooperative		22636 U.S. Hwy. 59 Worthington MN, 56187 United States	Electronic Service		No	23-151Official
275	Christine	Schwartz	regulatory.records@xcelenergy.com	Xcel Energy		414 Nicollet Mall FL 7 Minneapolis MN, 55401-1993 United States	Electronic Service		No	23-151Official
276	Douglas	Seaton	doug.seaton@umwlc.org	Upper Midwest Law Center		8421 Wayzata Blvd Ste 300 Golden Valley MN, 55426 United States	Electronic Service		No	23-151Official
277	Dean	Sedgwick	sedgwick@itascapower.com	Itasca Power Company		PO Box 455 Spring Lake MN, 56680 United States	Electronic Service		No	23-151Official
278	Jessie	Seim	jessie.seim@piic.org	Prairie Island Indian Community		5636 Sturgeon Lake Rd Welch MN, 55089 United States	Electronic Service		No	23-151Official
279	Darrell	Seki, Sr.	dseki@redlakenation.org			15484 Migizi Drive Red Lake MN, 56671 United States	Electronic Service		No	23-151Official
280	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	23-151Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
281	Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates		7400 Lyndale Ave S Ste 190 Richfield MN, 55423 United States	Electronic Service	Yes	23-151Official	
282	Bria	Shea	bria.e.shea@xcelenergy.com	Xcel Energy		414 Nicollet Mall Minneapolis MN, 55401 United States	Electronic Service	No	23-151Official	
283	Andrew R.	Shedlock	andrew.shedlock@kutakrock.com	Kutak Rock LLP		60 South Sixth St Ste 3400 Minneapolis MN, 55402-4018 United States	Electronic Service	No	23-151Official	
284	Doug	Shoemaker	dougs@charter.net	Minnesota Renewable Energy		2928 5th Ave S Minneapolis MN, 55408 United States	Electronic Service	No	23-151Official	
285	Beth	Smith	bsmith@greatermankato.com	Greater Mankato Growth		1961 Premier Dr Ste 100 Mankato MN, 56001 United States	Electronic Service	No	23-151Official	
286	Joel	Smith	jsmith@mnchippewatribe.org	Minnesota Chippewa Tribe		PO Box 217 Cass Lake MN, 56633 United States	Electronic Service	No	23-151Official	
287	Joshua	Smith	joshua.smith@sierraclub.org			85 Second St FL 2 San Francisco CA, 94105 United States	Electronic Service	No	23-151Official	
288	Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.		76 W Kellogg Blvd St. Paul MN, 55102 United States	Electronic Service	No	23-151Official	
289	Nizhoni	Smith	nizhoni.smith@lowersiouxs.com	Lower Sioux Indian Community		PO Box 308 39527 Reservation Highway 1 Morton MN, 56270 United States	Electronic Service	No	23-151Official	
290	Trevor	Smith	trevor.smith@avantenergy.com	Avant Energy, Inc.		220 South Sixth Street Suite 1300 Minneapolis MN, 55402 United States	Electronic Service	No	23-151Official	
291	Roger	Smith, Sr.	rogermsmithsr@fdlrez.com			1720 Big Lake Road Cloquet MN, 55720 United States	Electronic Service	No	23-151Official	
292	Beth	Soholt	bsoholt@cleangridalliance.org	Clean Grid Alliance		570 Asbury Street Suite 201 St. Paul MN, 55104 United States	Electronic Service	No	23-151Official	
293	Anna	Sommer	asommer@energyfuturesgroup.com	Energy Futures Group		PO Box 692 Canton NY, 13617 United States	Electronic Service	No	23-151Official	
294	Marie	Spry	mariespray@grandportage.com			PO Box 428 Grand Portage MN, 55605 United States	Electronic Service	No	23-151Official	
295	Mark	Spurr	mspurr@fvbenergy.com	International District Energy		222 South Ninth St.,	Electronic Service	No	23-151Official	

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
				Association		Suite 825 Minneapolis MN, 55402 United States				
296	Wallace	St. John, Sr.	wally.stjohn@millelacsband.com	Mille Lacs Band of Ojibwe		43408 Oodena Drive Onamia MN, 56359 United States	Electronic Service	No	23-151Official	
297	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	23-151Official	
298	Russ	Stark	russ.stark@ci.stpaul.mn.us	City of St. Paul		Mayor's Office 15 W. Kellogg Blvd., Suite 390 Saint Paul MN, 55102 United States	Electronic Service	No	23-151Official	
299	Byron E.	Starns	byron.starns@stinson.com	STINSON LLP		50 S 6th St Ste 2600 Minneapolis MN, 55402 United States	Electronic Service	No	23-151Official	
300	Cary	Stephenson	cstephenson@otpco.com	Otter Tail Power Company		215 South Cascade Street Fergus Falls MN, 56537 United States	Electronic Service	Yes	23-151Official	
301	Mark	Strohfus	mstrohfus@greenergy.com	Great River Energy		12300 Elm Creek Boulevard Maple Grove MN, 55369-4718 United States	Electronic Service	No	23-151Official	
302	James M	Strommen	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered		150 S 5th St Ste 700 Minneapolis MN, 55402 United States	Electronic Service	No	23-151Official	
303	Samuel	Strong	sam.strong@redlakenation.org	Red Lake Nation		15484 Migizi Drive Red Lake MN, 56671 United States	Electronic Service	No	23-151Official	
304	Kent	Sulem	ksulem@mmua.org			3131 Fernbrook Ln N Ste 200 Plymouth MN, 55447-5337 United States	Electronic Service	No	23-151Official	
305	Timothy	Sullivan	tsullivan@whe.org	Wright Hennepin Coop. Electric Assn.		6800 Electric Drive PO Box 330 Rockford MN, 55373 United States	Electronic Service	No	23-151Official	
306	David	Sunderman	daves@benco.org	BENCO (DUPLICATE)		PO Box 8 Mankato MN, 56002-0008 United States	Electronic Service	No	23-151Official	
307	Eric	Swanson	eswanson@winthrop.com	Winthrop & Weinsteine		225 S 6th St Ste 3500 Capella Tower Minneapolis MN, 55402-4629 United States	Electronic Service	No	23-151Official	
308	Randy	Synstelien	rsynstelien@otpco.com	Otter Tail Power Company		215 S Cascade St Fergus Falls MN, 56537 United States	Electronic Service	No	23-151Official	

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
309	Camille	Tanhoff	kamip@uppersiouxcommunity-nsn.gov	Upper Sioux Community		5722 Travers Lane PO BOX 147 Granite Falls MN, 56241 United States	Electronic Service		No	23-151Official
310	Mikayala	Thompson	mmthompson@otpco.com	Otter Tail Power Company		null null, null United States	Electronic Service		No	23-151Official
311	Tim	Thompson	tthompson@lrec.coop	Lake Region Electric Cooperative		PO Box 643 1401 South Broadway Pelican Rapids MN, 56572 United States	Electronic Service		No	23-151Official
312	Stuart	Tommerdahl	stommerdahl@otpco.com	Otter Tail Power Company		215 S Cascade St PO Box 496 Fergus Falls MN, 56537 United States	Electronic Service		Yes	23-151Official
313	Pat	Treseler	pat.jcplaw@comcast.net	Paulson Law Office LTD		4445 W 77th Street Suite 224 Edina MN, 55435 United States	Electronic Service		No	23-151Official
314	Lise	Trudeau	lise.trudeau@state.mn.us	Department of Commerce		85 7th Place East Suite 500 Saint Paul MN, 55101 United States	Electronic Service		No	23-151Official
315	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	23-151Official
316	Jackie	Van Norman	jvannorman@greenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	23-151Official
317	Analeisha	Vang	avang@mnpower.com			30 W Superior St Duluth MN, 55802-2093 United States	Electronic Service		Yes	23-151Official
318	Adrian	Varga	avarga@actcommodities.com	ACT Commodities		437 Madison Ave New York City NY, 10022 United States	Electronic Service		No	23-151Official
319	Sam	Villella	sdvillella@gmail.com			10534 Alamo Street NE Blaine MN, 55449 United States	Electronic Service		No	23-151Official
320	Julie	Voeck	julie.voeck@nee.com	NextEra Energy Resources, LLC		700 Universe Blvd Juno Beach FL, 33408 United States	Electronic Service		No	23-151Official
321	Amelia	Vohs	avohs@mncenter.org	Minnesota Center for Environmental Advocacy		1919 University Avenue West Suite 515 St. Paul MN, 55104 United States	Electronic Service		Yes	23-151Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
322	Michael	Volker	mvolker@eastriver.coop	East River Electric Power Coop		211 S. Harth Ave Madison SD, 57042 United States	Electronic Service		No	23-151Official
323	Toni	Volkmeier	toni.volkmeyer@state.mn.us	MPCA		520 Lafayette Rd. N. St. Paul MN, 55155 United States	Electronic Service		No	23-151Official
324	Trent	Waite	twaite@greenergy.com			null null, null United States	Electronic Service		No	23-151Official
325	Laurance R	Waldoch	larrywaldoch@gmail.com	Attorney		2597 Parkview Dr Saint Paul MN, 55110 United States	Electronic Service		No	23-151Official
326	Greg	Wannier	greg.wannier@sierraclub.org	Sierra Club		2101 Webster St Ste 1300 Oakland CA, 94612 United States	Electronic Service		No	23-151Official
327	Roger	Warehime	roger.warehime@owatonnautilities.com	Owatonna Municipal Public Utilities - Gas		208 S Walnut Ave PO BOX 800 Owatonna MN, 55060 United States	Electronic Service		No	23-151Official
328	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	23-151Official
329	Carol	Westergard	cwestergard@otpco.com	Otter Tail Power Company		215 S Cascade St Fergus Falls MN, 56537 United States	Electronic Service		No	23-151Official
330	Heather	Westra	heather.westra@piic.org	Prairie Island Indian Community		5636 Sturgeon Lake Rd Welch MN, 55089 United States	Electronic Service		No	23-151Official
331	Paul	White	paul.white@prcwind.com	Project Resources Corp./Tamarac Line LLC/Ridgewind		618 2nd Ave SE Minneapolis MN, 55414 United States	Electronic Service		No	23-151Official
332	Steve	White	steve.white@llojibwe.net	Leech Lake Band of Ojibwe		190 Sailstar Drive NW Cass Lake MN, 56633 United States	Electronic Service		No	23-151Official
333	Cody	Whitebear	cody.whitebear@piic.org	Prairie Island Indian Community		5636 Sturgeon Lake Road Welch MN, 55089 United States	Electronic Service		No	23-151Official
334	John	Williams	jwilliams@greenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	23-151Official
335	Laurie	Williams	laurie.williams@sierraclub.org	Sierra Club		Environmental Law Program 1536 Wynkoop St Ste 200 Denver CO, 80202 United States	Electronic Service		No	23-151Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
336	Virgil	Wind	virgil.wind@millelacsband.com	Mille Lacs Band of Ojibwe		43408 Oodena Drive Onamia MN, 56359 United States	Electronic Service		No	23-151Official
337	Joseph	Windler	jwindler@winthrop.com	Winthrop & Weinstine		225 South Sixth Street, Suite 3500 Minneapolis MN, 55402 United States	Electronic Service		No	23-151Official
338	Robyn	Woeste	robynwoeste@alliantenergy.com	Interstate Power and Light Company		200 First St SE Cedar Rapids IA, 52401 United States	Electronic Service		No	23-151Official
339	Sara	Wolff	sara@mnipl.org			710 Linwood Avenue St Paul MN, 55105 United States	Electronic Service		No	23-151Official
340	Tim	Wulling	t.wulling@earthlink.net			1495 Raymond Ave. Saint Paul MN, 55108 United States	Electronic Service		No	23-151Official
341	Laurie	York	laurie.york@whiteearth-nsn.gov	White Earth Reservation Business Committee		PO Box 418 White Earth MN, 56591 United States	Electronic Service		No	23-151Official
342	Kurt	Zimmerman	kwz@ibew160.org	Local Union #160, IBEW		2909 Anthony Ln St Anthony Village MN, 55418-3238 United States	Electronic Service		No	23-151Official
343	Emily	Ziring	eziring@stlouispark.org	City of St. Louis Park		5005 Minnetonka Blvd St. Louis Park MN, 55416 United States	Electronic Service		No	23-151Official
344	Patrick	Zomer	pat.zomer@lawmoss.com	Moss & Barnett PA		150 S 5th St #1200 Minneapolis MN, 55402 United States	Electronic Service		No	23-151Official