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November 25, 2024

—Via Electronic Filing—

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

RE: APPLICATIONS FOR A CERTIFICATE OF NEED AND ROUTE PERMIT FOR THE
MINNESOTA ENERGY CONNECTION PROJECT
MPUC DOCKET NOS. E002/CN-22-131 AND TL-22-132

Dear Mr. Seuffert:

On behalf of Northern States Power Company, doing business as Xcel Energy,
enclosed please find Comments on the Draft Environmental Impact Statement.

We have electronically filed this document with the Commission. Copies are also
being served on the persons on the attached service lists. Please contact me at
bria.e.shea@xcelenergy.com if you have any questions regarding this filing.

Sincerely,

/s/ *Bria E. Shea*

BRIA E. SHEA
REGIONAL VICE PRESIDENT, REGULATORY POLICY

Encls
c: Service List

STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION

Katie J. Sieben
Hwikwon Ham
Valerie Means
Joseph K. Sullivan
John A. Tuma

Chair
Commissioner
Commissioner
Commissioner
Commissioner

IN THE MATTER OF THE CERTIFICATE OF
NEED AND ROUTE PERMIT APPLICATIONS
FOR THE MINNESOTA ENERGY
CONNECTION PROJECT

DOCKET NOS. E002/CN-22-131
AND TL-22-132

**COMMENTS ON DRAFT
ENVIRONMENTAL IMPACT
STATEMENT**

INTRODUCTION

Northern States Power Company, doing business as Xcel Energy, respectfully submits these Comments on the Draft Environmental Impact Statement (DEIS) prepared for the Minnesota Energy Connection Project (Project) by the Minnesota Department of Commerce, Energy Environmental Review and Analysis (EERA). Xcel Energy appreciates EERA's preparation of the DEIS and believes that the DEIS reasonably addresses the issues and alternatives raised in scoping. Xcel Energy's limited comments here provide clarifications and/or additional information where it may be helpful in the review of the Project by EERA, the Administrative Law Judge, and the Minnesota Public Utilities Commission. In addition, consistent with the Scheduling Order in this matter, Xcel Energy will submit, among other things, its responses to public hearing comments on December 13, 2024.

These comments are organized to correspond to the organization of the DEIS. Xcel Energy also incorporates its pre-filed testimony into these comments, as applicable.¹

¹ See Direct Testimony of Jason Standing (Sept. 6, 2024) (eDocket No. [20249-210020-04](#)); Direct Testimony of Joseph Samuel (Sept. 6, 2024) (eDocket No. [20249-210020-03](#)); Direct Testimony of Matthew Langan (Sept. 6, 2024) (eDocket No. [20249-210020-02](#)); Surrebuttal Testimony of Joseph Samuel (Oct. 22, 2024) (eDocket No. [202410-211225-03](#)); and Surrebuttal Testimony of Matthew Langan (Oct. 22, 2024) (eDocket No. [202410-211225-02](#)).

COMMENTS

A. Project Background

1. Need

The DEIS states that the purpose of this Project is to: “construct a [HVTL] to connect new energy sources to the [Midcontinent Independent System Operator (MISO)] transmission grid at the location of the retiring Sherco coal-fired generator. . . .”² Xcel Energy requests that the DEIS further clarify that the primary purpose of the Project is to interconnect new *carbon-free* generation to the Sherco Substation. Specifically, in its order regarding Xcel Energy’s 2020-2034 Upper Midwest Integrated Resource Plan (IRP) (the 2019 IRP Order), the Commission specified:

Xcel has demonstrated that, between 2027 and 2032, it will need approximately 600 MW more solar-powered generation and 2,150 MW more wind-powered generation, or an equivalent amount of energy and capacity from a combination of wind, solar and/or storage.³

Likewise, there are currently open dockets related to the Company’s 2024-2040 IRP (Docket No. E002/RP-24-67) and acquisition of up to 800 MW of firm dispatchable generation (Docket No. E002/CN-23-212). In those dockets, Xcel Energy filed a Settlement Agreement on October 2, 2024. Under that Settlement Agreement, 2,800 MW of wind and 120 MW of standalone storage are projected to connect to the Project. The Settlement Agreement also supports the selection of the Company’s proposed 420 MW Lyon County Generating Station that will back up renewables and supply power during critical times, while also providing grid stability for the Minnesota Energy Connection. The Commission’s comment period regarding the Settlement Agreement closes on December 18, 2024.⁴

Overall, based upon the 2019 IRP Order and the proposed 2024 Settlement Agreement, the Company anticipates that the large majority of generation connected to

² DEIS at 1.

³ *In the Matter of the 2020-2034 Upper Midwest Integrated Resource Plan of Northern States Power Company d/b/a Xcel Energy*, MPUC Docket No. E002/RP-19-368, Order Approving Plan with Modifications and Establishing Requirements for Future Filings, at Ordering ¶ 2.A.8 (Apr. 15, 2022); *see id.* at 14 (“Xcel has demonstrated that, between 2027 and 2032, it will need approximately 600 MW more solar-powered generation and 2,150 MW of wind-powered generation on the Sherco gen-tie line—or an equivalent amount of energy and capacity from a combination of wind, solar, and/or storage.”).

⁴ *In the Matter of Northern States Power Company d/b/a Xcel Energy 2024-2040 Integrated Resource Plan*, MPUC Docket No. E002/RP-24-67, Notice of Comment Period (Nov. 1, 2024) and *In the Matter of Xcel Energy’s Competitive Resource Acquisition Process for up to 800 Megawatts of Firm Dispatchable Generation*, MPUC Docket No. E002/CN-23-212, Notice of Comment Period (Nov. 1, 2024).

the Project will be carbon-free (likely wind) generation, and the Project is needed regardless of the proposed Lyon County Generating Station. The Company thus respectfully requests that the Final Environmental Impact Statement (FEIS) further specify that the purpose of the Project is not only to connect new energy sources, but new *carbon-free* energy sources.

2. *Schedule*

The DEIS states that Project construction will commence in the third quarter of 2025.⁵ Xcel Energy notes that this timeframe is consistent with the Route Permit Application. The Company provided an update regarding Project schedule in the Direct Testimony of Joseph Samuel indicating that Project construction is anticipated to commence in early 2026 and be placed in service in third quarter 2028.⁶ The Company respectfully requests that the FEIS reflect this update to Project schedule.

3. *Cost*

Section 3.5 of the DEIS discusses Project costs. The cost estimates in the DEIS are consistent with the Route Permit Application. The Company provided additional information regarding Project costs in both the Direct Testimony and Surrebuttal Testimony of Mr. Samuel.⁷ Appendix O to the DEIS includes a supplemental information inquiry response from Xcel Energy regarding, among other things, costs. Xcel Energy notes that the version of Xcel Energy's response reproduced in Appendix O appears to be incomplete. Xcel Energy respectfully requests that the FEIS reflect this additional information and that the costs reflected in the FEIS reflect Mr. Samuel's Testimony and the complete supplemental information inquiry response from Xcel Energy; for example, as stated in Mr. Samuel's Direct Testimony (and contrary to the values presented in the DEIS), Xcel Energy anticipates that the Purple Route will cost *more* than the Blue Route, despite being shorter. Likewise, as reflected in Schedule 1 to Mr. Samuel's Surrebuttal Testimony, the Blue Route and Preferred Route are anticipated to cost less per mile than the Purple Route and Routes C and D studied in the DEIS.⁸

⁵ DEIS at 18.

⁶ Direct Testimony of Joseph Samuel at 3 (Sept. 6, 2024) (eDocket No. [20249-210020-03](#)).

⁷ Direct Testimony of Joseph Samuel at 3-5 (Sept. 6, 2024) (eDocket No. [20249-210020-03](#)) and Surrebuttal Testimony of Joseph Samuel at 4-6 (Oct. 22, 2024) (eDocket No. [202410-211225-03](#)).

⁸ Appendix O to the DEIS includes a supplemental information inquiry response from Xcel Energy regarding costs. The version of Xcel Energy's response reproduced in Appendix O may be incomplete in that it omits some narrative provided by the Company regarding cost calculations.

B. Chapter 4: Alternatives to the Project

In describing the feasibility of alternatives, the DEIS focuses primarily on whether an alternative can connect new energy resources at the Sherco Substation.⁹ The discussion of all alternatives would be more comprehensive if it were to include a determination of whether the alternative meets the Project need as identified in Section A(1) above—to connect more than 2,000 MW of carbon-free energy and capacity resources at the Sherco Substation.

In Section 4.2.5.1.2 Natural Gas, the DEIS states that the “alternative meets the purpose of the project to interconnect new generation sources to the Sherco Substation.”¹⁰ While a new gas plant that connects to the Project may be selected in Docket No. E002/CN-23-212, that is not the purpose of the Project. The purpose of the Project is to connect carbon-free energy and capacity resources at Sherco.

C. Chapters 5-12: Potential Impacts and Mitigation

1. Lux Airstrip

In Section 5.2.10.6.2, the DEIS notes that the Blue Route could impact the existing Lux Airstrip, a private grass airstrip, and states that “Route Segment 223 . . . is recommended to avoid direct impacts” to that airstrip.¹¹ As described in the Direct Testimony of Matthew Langan, Xcel Energy reviewed Route Segment 223 and does not support the entirety of that alternative because of increased impacts to residents on the southern portion of the alternative and constructability concerns associated with multiple potential crossings of an existing transmission line in this area.¹² However, Xcel Energy does not oppose the northern approximately one mile of Route Segment 223. In Mr. Langan’s Direct Testimony, Xcel Energy identified a modified version of Route Segment 223, along with the human and environmental impacts associated with the modified route segment.¹³ Xcel Energy does not object to the modified alternative being included in the Project’s route and requests that the FEIS include analysis related to the modified alternative. Xcel Energy will provide any additional information needed by EERA for this modified alternative.

2. Redwood Falls Municipal Airport

During the November 7, 2024, meeting and hearing in Redwood Falls, a member of the public questioned whether the Redwood Falls Municipal Airport should be

⁹ See, e.g., DEIS at 59.

¹⁰ *Id.* at 63.

¹¹ *Id.* at 115.

¹² Direct Testimony of Matthew Langan at 12 (Sept. 6, 2024) (eDocket No. [20249-210020-02](#)).

¹³ *Id.*

identified and analyzed in the DEIS. The Blue Route is approximately 3 miles south of that airport. The Purple Route is farther from the airport than the Blue Route. Due to the distance of the Blue Route from the Redwood Falls Municipal Airport, no impacts are anticipated from the Project. Regardless, Xcel Energy will consult with the Federal Aviation Administration as needed.

3. *Stray voltage*

During the October/November 2024 meetings and hearings, members of the public had questions and comments concerning stray voltage. This topic is addressed in Section 5.3.4 of the DEIS. At the meetings and hearings, Xcel Energy representatives provided further information regarding the Company's voluntary procedures related to stray voltage. Related to those procedures, for the convenience of EERA and the public, Xcel Energy provides here a link to *Minnesota Stray Voltage Guide: A Guide for Addressing Stray Voltage Concerns*.¹⁴

4. *Route Segment 213*

Section 7.9.5 of the DEIS discusses Route Segment 213 and states that the alternative was proposed, among other things, to avoid nearby dwellings.¹⁵ Xcel Energy's initial review of Route Segment 213 identified several issues related to this alternative, including the close proximity to the Minnesota Department of Natural Resources Sheridan Wildlife Management Area (WMA) and state conservation easements along the Redwood River, a greenfield crossing of the Redwood River, additional wetland crossings, and three additional angle structures that increase cost. Route Segment 213 does, however, provide a net reduction of four residences within 300 feet of the transmission line. Therefore, upon further analysis, including review of comments made during the public hearings, Xcel Energy has determined that, although there would be an increase in cost, Route Segment 213 would be feasible because the Project alignment could avoid the WMA and conservation easements. Xcel Energy does not object to the extent the Commission selects Route Segment 213 as part of the Project's route.

5. *Center pivot irrigation systems*

Xcel Energy's route development attempted to avoid impacts on center pivot irrigation systems by following property and field lines, allowing center pivot irrigation systems to continue to function, regardless of whether they are within the right-of-way or route. In certain areas, other constraints (*i.e.*, residences) made total avoidance

¹⁴ See https://www.minnesotastrayvoltageguide.com/wp-content/uploads/2015/10/MN_StrayVoltageGuide_HR.pdf.

¹⁵ DEIS at 275.

infeasible. Where a center pivot irrigation system is impacted, Xcel Energy will work closely with the landowner to minimize and mitigate those impacts.

With respect to center pivot irrigation systems, Appendix E of the DEIS analyzes and compares the length (in feet) of a route's crossing of a system, as well as acres of a system within a route's right-of-way. Xcel Energy notes, however, that acreage of a system within a right-of-way does not indicate actual impacts to a system, particularly where a right-of-way follows property and field lines. In other words, acreage of a center pivot irrigation system within a right-of-way does not necessarily mean that the system would be impacted by the Project. Xcel Energy requests that the FEIS reflect that acreage of a system within a right-of-way does not necessarily indicate adverse impacts to that system.

In Sections 9.8 and 11.8, the DEIS states that Route Segments D4 and F4 (both of which correspond to the Blue Route) would result in impacts to existing center pivot irrigation systems.¹⁶ More specifically, the Blue Route along Route Segment D4 would cross two center pivot irrigators just east of Grove Creek; it is not clear to Xcel Energy that impacts would be unavoidable to these systems, given their location in relation to the right-of-way. In this area, the route was developed to avoid greater impacts to residences if the route were to follow existing roads in the area, including pinch points where residences exist on either side of roads. Similarly, the Blue Route along Route Segment F4 would cross two center pivot irrigators; here, too, it is not clear to Xcel Energy that impacts would be unavoidable to these systems, given their location in relation to the right-of-way. In this area, the Blue Route follows generally property lines and avoids residences within 300 feet; furthermore, the Blue Route in this area avoids the residential development to south on the northern edge of City of Kimball.

Site-specific analysis will be conducted after a route is selected and more detail is available regarding the irrigation systems to determine whether adjustments are feasible to avoid or minimize impacts.

6. Reliability

The DEIS describes system reliability and safety concerns associated with transmission line crossings in Section 5.8, consistent with Minn. Stat. 216E.02, subd. 1 and Minn. R. 7850.4100(K), which requires consideration of electrical system reliability. The DEIS does not assess differences in line crossings and reliability among route alternatives studied. As described in the Direct Testimony of Jason Standing and Xcel Energy's response to supplemental information inquiry 4 (included in Appendix O of the DEIS), transmission line circuits that cross over one another present operational and maintenance challenges. For example, both lines may need to be removed from service

¹⁶ *Id.* at 336 and 390.

for a maintenance crew to work safely on one of the lines. Xcel Energy generally seeks to minimize line crossings to enhance reliability. Enhancing reliability is particularly critical for the Project because it will be a radial line that is anticipated to support more than 2,000 MW of wind and 420 MW of firm dispatchable resources. Xcel Energy requests that, in addition to acknowledging the reliability risks associated with line crossings, the FEIS more closely analyze variations in line crossings among route alternatives.

7. *Right-of-way sharing and paralleling*

The DEIS analyzes right-of-way sharing and paralleling with respect to transmission lines, roads and railroads, pipelines, parcels, section lines, and division lines. In Xcel Energy's response to supplemental information inquiry 3 (included with Appendix O of the DEIS), the Company described challenges associated with paralleling some of these features—in particular, railroads and pipelines. To allow for a comparison of right-of-way sharing/paralleling by feature, Xcel Energy requests that the FEIS identify sharing/paralleling of railroads and pipelines, individually. Although Appendix E identifies these features individually, currently, Table 17-2 of the DEIS combines roads and railroads, and combines pipelines with other features. Xcel Energy respectfully submits that separating these features from the summary analysis presented in Chapter 17 would allow for a better comparison among routes.

8. *Distance from residences*

In Table 17-2 of the DEIS, distances to residences are identified for each end-to-end route alternative A-D using a metric of 0-500 feet. Xcel Energy requests that the FEIS use the following distance metrics in calculating impacts to residences: 0-75 from the transmission line centerline, 76-150, 151-300, and 301-500.

D. Chapter 14: Substations

Chapter 14 of the DEIS analyzes potential impacts associated with Project substations. As described in that chapter, Xcel Energy identified substation siting areas along both the Blue and Purple Routes within which the voltage support and intermediate substations would be sited. Xcel Energy has been engaged in landowner outreach to identify more specific substation locations. As a result of that engagement, Xcel Energy has identified a site with a willing landowner for the voltage support substation along the Blue Route. **Attachment 1** is a map depicting that site. The site is currently agricultural land and would not impact wetlands, conservation easements, or forested areas, and no sensitive habitat or species are anticipated to be present. Xcel Energy is continuing landowner outreach to acquire a site for the voltage support substation on the Purple Route.

E. Chapter 16: Cumulative Potential Effects

Chapter 16 of the DEIS provides a thorough review of known projects in the vicinity of the Project. The DEIS also acknowledges that the Project's purpose is to interconnect additional renewable energy and, thus, that additional generation projects are anticipated in the area.¹⁷ Because the developments that will be interconnected via the Project have not yet been identified, specific information regarding the impacts of those developments is not yet available. However, the FEIS could recognize that the Commission has approved 2,750 MW of renewable generation to interconnect with the Project and that the 2024 Settlement Agreement contemplates that 2,800 MW of wind and 120 MW of standalone storage will connect to the Project, as well as the proposed 420 MW Lyon County Generating Station.¹⁸ The potential environmental impacts of the Lyon County Generating Station are being reviewed initially by EERA in Docket E002/CN-23-212. Any interconnecting projects will be the subject of separate permitting proceedings, and the human and environmental impacts of those projects will be assessed as part of those proceedings.

In addition, Chapter 16 identifies the proposed Birch Coulee solar project being developed in the vicinity of the City of Franklin, Minnesota. Xcel Energy is aware of this proposed solar project and is reviewing the alignment of the Preferred Route in this area to minimize potential conflict with the solar project.

CONCLUSION

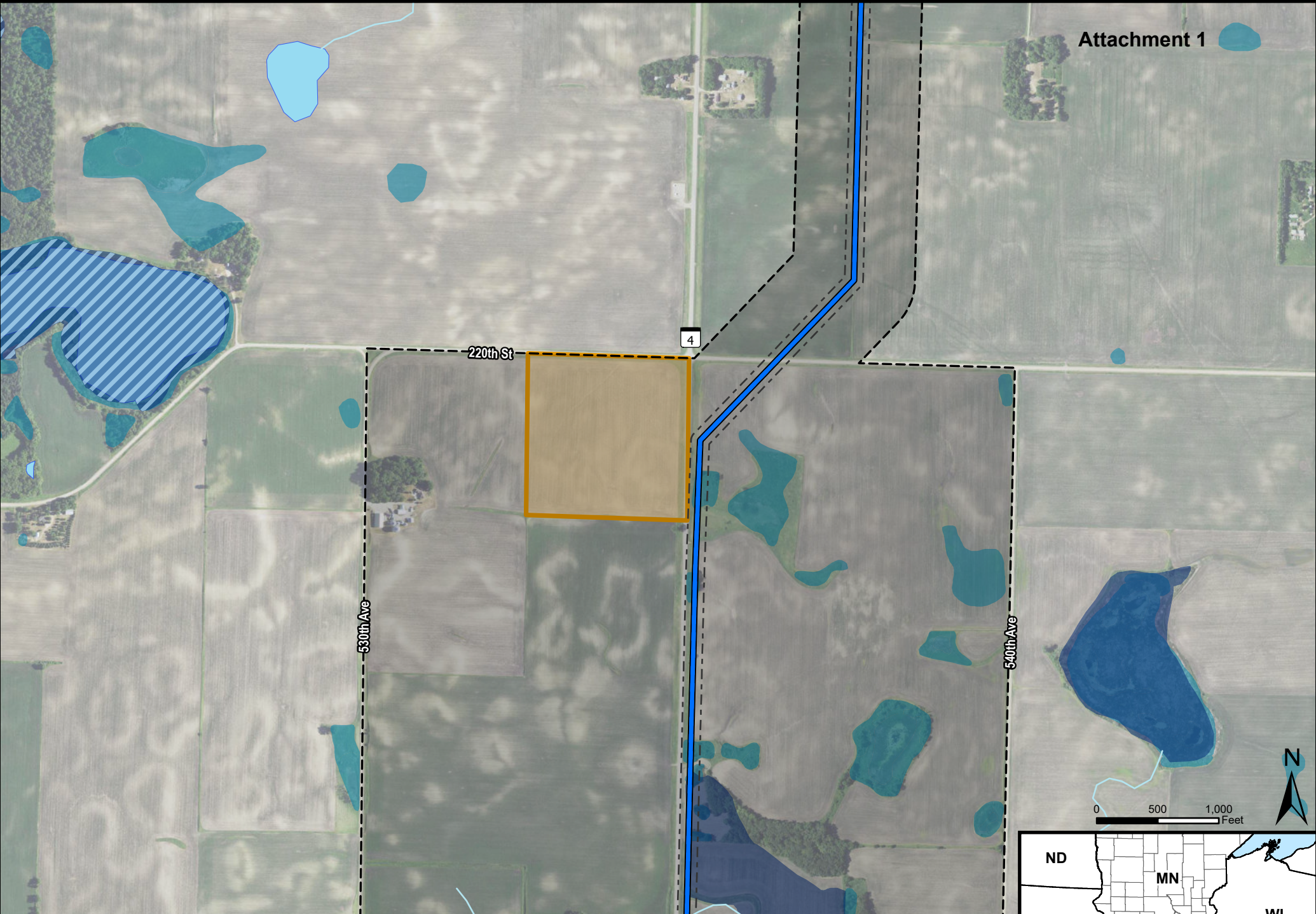
Based on Xcel Energy's review, the DEIS is a robust document that reasonably addresses the issues and alternatives raised in scoping. Xcel Energy appreciates the opportunity to provide comments on the DEIS, and the Company submits these comments to provide specific clarifications and/or updates regarding the Project. Where the Company has requested that the FEIS include additional or modified analysis, the Company is willing to coordinate with EERA to ensure that EERA has any data needed for the FEIS.

Dated: November 25, 2024

Northern States Power Company

¹⁷ *Id.* at 452.

¹⁸ See *In the Matter of Northern States Power Company d/b/a Xcel Energy 2024-2040 Integrated Resource Plan*, MPUC Docket No. E002/RP-24-67, Joint Settlement Agreement at 6 (Oct. 2, 2024).



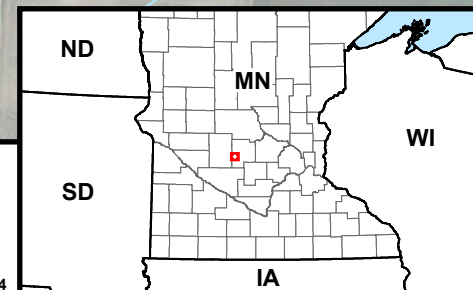
Voltage Support Substation (Blue Route) Minnesota Energy Connection



DISCLAIMER: This information is believed to be correct but is subject to change and is not warranted.

- | | | |
|----------------------------------|---|-------------------------|
| Blue Route | Voltage Support Substation (Blue Route) | Shallow Lakes |
| Blue Route Proposed Right-of-Way | Stream/River/Ditch | Lake, Pond or Reservoir |
| Blue Route Proposed Route Width | MNDNR NWI Wetland | Public Waters Basins |

Date: 11/19/2024



**IN THE MATTER OF THE
CERTIFICATE OF NEED AND
ROUTE PERMIT APPLICATIONS
FOR THE MINNESOTA ENERGY
CONNECTION PROJECT**

CERTIFICATE OF SERVICE

**MPUC Docket Nos. E002/CN-22-131
and TL-22-132**

Breann L. Jurek certifies that on the 25th day of November 2024, she e-filed on behalf of Northern States Power Company, doing business as Xcel Energy, a true and correct copy of its Comments on the Draft Environmental Impact Statement with the Minnesota Public Utilities Commission via eDockets (www.edockets.state.mn.us). Said document was also served on the Official Service Lists of record on file with the Minnesota Public Utilities Commission and as attached hereto.

Executed on: November 25, 2024

Signed: /s/ Breann L. Jurek

Fredrikson & Byron, P.A.
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48	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	22-131Official
49	Jonathan	Wolfgang	jonathan.wolfgang@state.mn.us		Office of Pipeline Safety	445 Minnesota St Ste 147 Woodbury MN, 55125 United States	Electronic Service		No	22-131Official

#	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	22-132Official CC Service List
2	Mara	Ascherman	mara.k.ascherman@xcelenergy.com	Xcel Energy		414 Nicollet Mall Fl 5 Minneapolis MN, 55401 United States	Electronic Service		No	22-132Official CC Service List
3	David	Bell	david.bell@state.mn.us		Department of Health	POB 64975 St. Paul MN, 55164 United States	Electronic Service		No	22-132Official CC Service List
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	22-132Official CC Service List
5	Ian M.	Dobson	ian.m.dobson@xcelenergy.com	Xcel Energy		414 Nicollet Mall, 401-8 Minneapolis MN, 55401 United States	Electronic Service		No	22-132Official CC Service List
6	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	22-132Official CC Service List
7	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	22-132Official CC Service List
8	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	22-132Official CC Service List
9	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	22-132Official CC Service List
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	22-132Official CC Service List
11	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	22-132Official CC Service List
12	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	22-132Official CC Service List
13	Breann	Jurek	bjurek@fredlaw.com	Fredrikson & Byron PA		60 S Sixth St Ste 1500	Electronic Service		No	22-132Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						Minneapolis MN, 55402 United States				CC Service List
14	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- 132Official CC Service List
15	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- 132Official CC Service List
16	Nicholas	Korn	njkorn@gmail.com			27445 County Road 23 Albany MN, 56307 United States	Electronic Service		No	22- 132Official CC Service List
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- 132Official CC Service List
18	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- 132Official CC Service List
19	Carol A.	Overland	overland@legalelectric.org	Legalelectric - Overland Law Office		1110 West Avenue Red Wing MN, 55066 United States	Electronic Service		No	22- 132Official CC Service List
20	Stephen	Rakow	stephen.rakow@state.mn.us		Department of Commerce	Suite 280 85 Seventh Place East St. Paul MN, 55101-2198 United States	Electronic Service		No	22- 132Official CC Service List
21	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- 132Official CC Service List
22	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- 132Official CC Service List
23	Christine	Schwartz	regulatory.records@xcelenergy.com	Xcel Energy		414 Nicollet Mall FL 7 Minneapolis MN, 55401- 1993 United States	Electronic Service		No	22- 132Official CC Service List
24	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- 132Official CC Service List
25	Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates		7400 Lyndale Ave S Ste 190 Richfield MN, 55423 United States	Electronic Service		Yes	22- 132Official CC Service List
26	Bria	Shea	bria.e.shea@xcelenergy.com	Xcel Energy		414 Nicollet Mall Minneapolis	Electronic Service		No	22- 132Official CC

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						MN, 55401 United States				Service List
27	Suzanne	Todnem	suzanne.todnem@state.mn.us		Office of Administrative Hearings	600 Robert Street North PO Box 64620 St. Paul MN, 55164 United States	Electronic Service		Yes	22-132Official CC Service List
28	Jayme	Trusty	execdir@swrdc.org	SWRDC		2401 Broadway Ave #1 Slayton MN, 56172 United States	Electronic Service		No	22-132Official CC Service List
29	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	22-132Official CC Service List
30	Garrick	Valverde	garrick.valverde@apexcleanenergy.com	Apex Clean Energy		8665 Hudson Boulevard North Suite 200 Lake Elmo MN, 55042 United States	Electronic Service		No	22-132Official CC Service List
31	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	22-132Official CC Service List
32	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	22-132Official CC Service List
33	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	22-132Official CC Service List
34	Jonathan	Wolfgram	jonathan.wolfgram@state.mn.us		Office of Pipeline Safety	445 Minnesota St Ste 147 Woodbury MN, 55125 United States	Electronic Service		No	22-132Official CC Service List