STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION

Katie J. Sieben	Chair
Hwikwon Ham	Commissioner
Audrey Partridge	Commissioner
Joseph K. Sullivan	Commissioner
John A. Tuma	Commissioner

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

INITIAL COMMENTS OF GERONIMO POWER, LLC

INTRODUCTION

On July 16, 2025, Xcel Energy ("Xcel" or "Company") filed a Petition with the Minnesota Public Utilities Commission ("Commission") seeking approval of new tariffs for Large General Time of Day Service and Large Peak Controlled Time of Day Service.[1] Xcel submitted these proposed tariffs, along with revised rules, riders, and Retail Customer Form Electric Service Agreement ("ESA") and Interconnection Agreement ("IA"), in compliance with Order Point 32 of the Commission's April 21, 2025 Order in Xcel's 2024–2040 Integrated Resource Plan and its petition to acquire 800 megawatts ("MW") of firm dispatchable resources.[2] Generally speaking, Xcel's proposal would create a new sub-class within the Demand class to serve new and existing customers with new electric demand of 100 MW or greater—including data centers, as defined under Minn. Stat. § 216B.02, Subd. 11—under a tariff that sets forth key terms of service. While the proposed tariff will govern the costs of delivering existing generation to new customers, it appears that any new generation needed to support a data center load will be evaluated during ESA negotiations. The proposal requires an incremental cost test at the time each ESA is executed to ensure that the addition of new large customers provides positive benefits to existing system customers. Geronimo Power, LLC ("Geronimo Power") respectfully submits these initial comments to address several topics in the Commission's July 29, 2025 Notice of Comment Period.[3]

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[1] *See* Doc. ID No. 20257-221060-01 (hereinafter, "Petition").

[2] *See In Re Xcel Energy's 2024–2040 Upper Midwest Integrated Resource Plan*, Docket No. E-002/RP-24-67, *Order Approving Settlement Agreement with Modifications* (Apr. 21, 2025) (Doc. ID No. 20254-217941-01) (hereinafter "IRP Order").

[3] *See In Re Northern States Power Co.'s, d/b/a Xcel Energy's, Petition for Approval of Large General Time of Day Service Customers and Large Peak Controlled Time of Day Service Tariffs*, Docket No. E-002/M-25/289, *Notice of Comment Period* (Jul. 29, 2025) (Doc. ID No. 20257-221510-01). Geronimo Power is a leading North American renewable energy development company based in Minneapolis, Minnesota that has successfully developed over 3,000 megawatts ("MW") of wind and solar projects, which are either operational or currently under construction. It has a

Large-scale data centers are being constructed across the country due to growing demand for, among other things, artificial intelligence and cloud computing services. The Department of Energy recently found that load growth from data centers could double or triple by 2028,[4] and the Electric Power Research Institute found that data center load could account for over nine percent of all U.S. electric generation by 2030.[5] Given these significant load growth projections, discussions on queue processing for new large loads are being held at the Federal Energy Regulatory Commission ("FERC"), regional transmission organizations, and in state commissions across the country.[6]

While data centers can be attractive customers for utilities, they come with certain challenges. These facilities typically demand a high amount of power with a high load factor,[7] which can theoretically improve utilization of a utility's existing assets and spread its fixed costs across a greater sales base. Some studies show that utilities can forego or delay new generation buildout if they can enable load flexibility and partial curtailments during peak demand times.[8] This, coupled with effective utilization of existing system headroom, could reduce fixed and volumetric costs to all utility customers.[9] However, there are significant nationwide challenges to reliably and affordably procure, permit, interconnect, and construct the additional generation resources and other infrastructure to serve these new data centers. The general consensus holds that the incremental costs of this new infrastructure will need to be recovered from data center customers, or other customers may end up shouldering the additional costs.

Beyond concerns about who bears these costs, there are practical challenges in developing infrastructure needed to reliably serve new data center loads. Supply chain and procurement bottlenecks, increased interconnection delays and costs, escalating permitting challenges, and a changing financing environment add complexity to obtaining the generation infrastructure needed to serve this new load growth. In Minnesota, where utilities are required to generate or procure sufficient carbon-free generation by 2040 to serve their entire retail load,[10] these already difficult tasks must be implemented in a manner that does not compromise progress toward these critical statutory goals. That said, many data center customers have sustainability goals, making this particular challenge also a distinguishing asset when compared to other states. Minnesota also has a unique ability to unlock additional carbon-free generation by making better use of (1)

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large pipeline of projects in various development stages throughout the country and is committed to developing projects that produce clean, affordable energy and benefit the communities in which they are located.

[4] U.S. Dep't of Energy, *DOE Releases New Report Evaluating Increase in Electricity Demand from Data Centers* (Dec. 20, 2024), *available at* https://tinyurl.com/mwe3f9mb.

[5] *See Power Intelligence: Analyzing Artificial Intelligence and Data Center Energy Consumption*, Electric Power Research Inst., at 17 (May 2024), *available at* https://tinyurl.com/ky9axxjc.

[6] *See, e.g., In Re Large Loads Co-Located at Generating Facilities*, *Constellation Energy Generation LLC v. PJM Interconnection, LLC*, 190 FERC ¶ 61,115 (Feb. 20, 2025); Erin Murphy, NextEra Energy, *Co-located Generation and Load: Study Proposal* (Jul. 24, 2024), *available at* https://tinyurl.com/2vj2whx7.

[7] *See* Andrew Satchwell et al., *Electricity Rate Designs for Large Loads: Evolving Practices and Opportunities*, at 1, Lawrence Berkeley Nat'l Laboratory (Jan. 16, 2025), *available at* https://tinyurl.com/ycxtnyhm.

[8] *See* Tyler H. Norris et al., *Rethinking Load Growth: Assessing the Potential for Integration of Large Flexible Loads in US Power Systems*, at 5, 18–23, Nichols Inst. for Energy, Environment, & Sustainability (2025), *available at* https://tinyurl.com/my4eab6p.

[9] *Id.* at 6–7.

[10] Minn. Stat. §216B.1691, Subd. 2g.

aging renewable infrastructure ripe for new contracts, storage, or repowering, (2) significant existing renewable assets being persistently curtailed due to transmission constraints, and (3) a utility, renewable industry, customer, and regulatory environment that knows well how to work together to complete complex new projects. Geronimo Power believes that novel problems require novel, agile solutions, and it would benefit the public interest to recognize that the possibilities in front of this Commission are not zero-sum.

In the Petition, Xcel states that its proposed tariffs provide offerings that are attractive to potential data center customers, while protecting the interests of its other customers.[11] Geronimo Power agrees that these are appropriate objectives and commends Xcel for the work it has put into developing these tariffs. Additionally, Geronimo Power believes the proposed tariffs could be refined and improved, particularly in ways that encourage new data center customers to serve their load through Commission-approved, co-located or behind-the-meter ("BTM") generation. This flexibility can help mitigate the stress these new loads place on the Company's system and air gap other customers from potential costs by both harnessing existing, under-utilized generation and new generation assets at various stages of development.

As discussed in greater detail below, Geronimo Power recommends the Commission direct Xcel to (1) modify its proposed tariffs in a manner that authorizes and encourages co-located generation for data center loads, especially in areas where there is sufficient existing generation or transmission capacity; (2) implement an expedited load interconnection study process for new data center load that would be co-located with new or existing generation; (3) establish a scoring metric that favors or assigns preference to generators that would be co-located with large data center customers in any future procurement proceedings for resources needed to serve those loads; and (4) provide additional clarity on what proposals it would implement if the Company's incremental cost test shows that new data center customers will generate revenues lower than their incremental costs.

DISCUSSION

I. The proposed tariffs should more explicitly authorize and encourage co-located generation for data center customers.

Given the substantial magnitude of potential load growth from data centers and to limit potential cost impacts to Xcel's other customers, the proposed tariffs should explicitly authorize and incentivize a mix of resource solutions to serve those loads, including self-supply; co-located, BTM, or front-of-the-meter ("FTM") generation; bi- or tri-lateral contracts between data center customers, utilities, and independent power producers ("IPPs"); and traditional utility-procured resources. The idea here is to incentivize new data center customers to "bring your own generation" to satisfy a portion of their own load. This will enable these new customers to secure adequate and reliable sources of power to meet their needs and provide regulatory certainty around large energy infrastructure needed to support large loads, while limiting potential additional stressors on grid infrastructure, reliability, and cost impacts to Xcel's existing customers.

[11] Petition at 3.

A. Background on Co-Located Generation

It is not new or particularly unusual for a large commercial or industrial customer to meet a portion of its electric requirements through a mix of on-site generation and utility-procured power.[12] Typically, such a customer meets all or a portion of its electric requirements through on-site generation and takes service from the utility when its generation is offline (e.g., due to maintenance) or for that portion of its requirements exceeding the capacity of the on-site generation. The customer often takes service under standby or supplemental service tariffs, with the utility assessing reservation charges to provide service when the customer's generation is not operating. Theoretically, partial requirements customers with reliable on-site generation—especially generation that operates during the utility's peak hours—can similarly reduce the utility's need for reserve capacity, which likewise reduces costs.[13]

Co-located generation for large-scale data centers is similar. Under a typical co-location arrangement, the data center procures all or a significant portion of its energy requirements from a generating resource that is connected directly to the facility, on the customer's side of the meter and point of interconnection ("POI") to the transmission system.[14] The data center customer could be fully isolated from the grid, but it is more likely to maintain a connection to the utility's system for supplemental or backup power, especially if the co-located generator does not have sufficient capacity to meet the facility's full requirements. The co-located generating resource may be owned by the data center, an IPP, or the incumbent utility.

Under Minnesota law, public utilities have the right and obligation to serve retail customers within their service territory.[15] While co-located or BTM generation can have different meanings or implications in different regulatory contexts, this arrangement is compatible with Minnesota's regulated retail market. Indeed, there are a variety of commercial structures that can be employed with co-located generation and are consistent with the state's traditional regulatory compact. The first and most obvious is the data center customer owning and operating its own generation, which is similar to other large industrial customers with on-site generation. This is already a reality for many net-metered Xcel customers, who are both producers and consumers. However, some data customers may be unable to deviate from their core business and take on the risk of owning and/or operating a large power station. In that case, the customer has a range of options, from contracting with third parties for operation and maintenance responsibilities to more complex commercial structures that place more development, construction, financing, and operational risk on a utility or IPP partner. Another approach is to enter into a power purchase agreement ("PPA") with a third party owner of a co-located generating resource, whereby the

[12] *See, e.g.*, *Report on Co-Location*, Maryland Pub. Serv. Comm'n, at 1, 6 (Dec. 18, 2024), *available at* https://tinyurl.com/4kc34atu ("Co-location, namely, the physical siting and direct physical connection of end-use load with generation, is not itself a novel concept.").

[13] *See, e.g.*, *Analysis of Standby Rates and Net Metering Policy Effects on Combined Heat and Power (CHP) Opportunities in Minnesota*, Energy Resources Center, University of Illinois at Chicago, at 20–21 (Apr. 2014), *available at* https://tinyurl.com/y4ee398y.

[14] *See, e.g.*, *See* Todd Schatzki et al., *Co-Located Load: Market, Economic, and Ratemaking Implications*, Analysis Group, at 13–14 (Oct. 8, 2024), *available at* https://tinyurl.com/5n7t3e4e (hereinafter, "Analysis Group Study").; Heidi Lange, NextEra Energy, *Co-located Load and Generation in MISO*, at 7 (Apr. 24, 2024), *available at* https://tinyurl.com/mvr59z4f.

[15] *See* Minn. Stat. § 216B.40.

third party owns the generator but sells all or a portion of its energy and capacity to the data center customer.[16] If the third party is an IPP, the contract could be structured as a "utility-sleeved PPA," whereby the utility acts as an intermediary or "sleeve" between the generator and the customer; this preserves the traditional regulatory model while capturing potential efficiencies.

B. Benefits of Co-Located Generation

The benefits of the co-locating data center load and generation can be substantial.[17] For instance, in many areas of the country, it can take several years to fully process load interconnection requests for new large-scale data centers. This delay reflects the amount of time that it takes to study the impacts of the new load on system reliability and construct additional generation or transmission infrastructure that may be needed to serve that new load.[18] As a result, many regional transmission organizations are examining ways to expedite the large load interconnection study request process, particularly by highlighting how load and generation interconnection delays often compound one another.[19] In other regulatory domains, this includes investing in potential efficiencies by studying co-located load and generation together. FERC has contemplated the issue in various forms—including hybrid participation where multiple generation resources networked behind the same POI—which could provide a more expeditious and efficient path for completing interconnection studies and bringing data centers online.[20] Some of these benefits are described in greater detail below.

Reduced Congestion

Co-location arrangements can reduce or at least minimize both existing congestion and new congestion that may arise when new large loads outpace the required buildout of associated transmission capacity.[21] There are areas on the grid where transmission congestion constrains the optimal, economic dispatch of generation to load, which increases costs to customers. Co-locating generation with data center load creates a direct and geographically proximate tie between generation and load, thereby avoiding overuse of critical transmission assets needed to otherwise carry generation to load.

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[16] A variation on this approach is a virtual PPA ("VPPA"), which is technically not a contract to buy electricity, but rather, a hedging instrument known as a contract-for-differences. The customer (here, a data center) enters into an agreement to purchase electricity (and typically, any associated renewable energy credits) from a generator at a fixed price but does not take physical delivery of the power. Instead, the customer procures energy from the local utility, while the generator sells its electric output into the wholesale market, at the prevailing market price and at a specified injection point. If the market price at that injection point exceeds the fixed PPA price, the generator pays the difference to the customer, and vice versa. This structure can be attractive to customers with distributed loads or who want greater geographic flexibility in selecting the "source" of their power.

[17] *See generally In Re Large Loads Co-Located at Generating Facilities,* 190 FERC ¶ 61,115, ¶¶ 46–49 (Feb. 20, 2025).

[18] *See* Analysis Group Report, at 12.

[19] For example, the Board of Directors of the Southwest Power Pool ("SPP") recently passed Revision Request 696, which paves the way for SPP to propose that FERC modify SPP's tariff to create a 90-day path for interconnecting large loads and supporting generation. *See* Robert Walton, *Southwest Power Pool approves accelerated large load interconnection policy*, Utility Dive (Sept. 17, 2025), *available at* https://tinyurl.com/5evaxj9v.

[20] *See, e.g.*, Andrew Levitt et al., *Accelerating the Integration of New Co-located Generation and Loads*, at 11–21, The Brattle Group (Apr. 23, 2025), *available at* https://tinyurl.com/2tf6p4h5.

[21] *See* Heidi Lange, NextEra Energy, *Co-located Load and Generation in MISO*, at 4 (Apr. 24, 2024), *available at* https://tinyurl.com/mvr59z4f.

Optimizing Existing Generation and Coupling with New Generation

Co-locating generation with data center load can also improve reliability and efficiency by optimizing the utilization of existing or new resources. In some parts of the country, data centers are being sited adjacent to existing or retired baseload resources that otherwise are not operating economically in the wholesale market, such as carbon-free nuclear generation.[22] This provides the data center customer with a reliable source of power and the generator with a revenue stream. Similarly, data centers could be sited in geographic "sweet spots" that have abundant—and often curtailed—existing renewable generating capacity and/or excess transmission and substation capacity. For example, in windy southwest Minnesota, there are several substations on Xcel's system that have become heavily transmission constrained, yielding ongoing, persistent curtailments that leave renewable resources under-utilized.[23] Even where transmission upgrades are planned to relieve some of the congestion, implementing those upgrades can take years. Siting data centers in these areas reduces congestion elsewhere on the system, optimizes use of existing infrastructure, and mitigates the need for incremental capital investment in new infrastructure.

Strategic Siting of Data Centers Has Added Economic Benefits to Communities

Another benefit of adding load to areas with high congestion curtailment is that it allows existing renewable assets to continue operating at more hours, generating more production tax revenue for host counties, many of which are predominately rural in nature. Increasing dispatch from existing renewable generators would result in increased production tax revenue for Minnesota counties, help existing renewable resources reach their highest and best use, and reduce the need for the buildout of additional transmission and other infrastructure, which ratepayers would otherwise be responsible for funding. While new transmission will almost certainly be needed to accommodate data center loads, which could double or even triple by 2030, there is a benefit to siting new loads in areas that minimize overall system impact and the need to transmit power over larger distances from where it is produced.

Develop Clean Energy Resources

Co-locating data center load with generation can also help Minnesota achieve its clean energy goals. As noted earlier, many corporate data center customers have sustainability goals, which include using carbon-free energy to power their facilities.[24] While renewable resources like wind or solar are inherently intermittent in nature, when paired with battery or other storage technologies, they can become more firm and dispatchable. As such, co-located renewable resources can simultaneously provide reliable, low-cost power to data center customers, while enabling Xcel to be effectively carbon-free in Minnesota by 2040 and Company-wide by 2050.[25]

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[22] *See, e.g.*, Rob Wile, *Three Mile Island nuclear plant to help power Microsoft's data-center needs*, NBC News (Sept. 20, 2024), *available at* https://tinyurl.com/mrxzu36p.

[23] *See generally In Re Investigation into Transmission-Curtailment Matters, Drivers, and Potential Solutions to Limitations Resulting from the Nobles County Substation*, Docket No. E-999/CI-24-316.

[24] *See, e.g.,* Stefan Modrich, *Datacenters balancing sustainability goals with accelerating AI demand*, S&P Global (Feb. 20, 2025), *available at* https://tinyurl.com/3naxd57b.

[25] *See* Xcel Energy, *Sustainability: Carbon Reduction* (last visited Sept. 15, 2025), *available at* https://tinyurl.com/4ndeubyf.

Reducing Costs and Minimizing Impact of Large Loads

Finally, co-location can reduce costs for all stakeholders. As described earlier, a significant amount of new data center load will be coming online in the next five years. The speed at which this load will be coming online raises resource adequacy concerns, as new generation will almost certainly need to be constructed to serve it.[26] Co-locating data centers with existing or new generation—whether owned by the customer or another third party—can reduce the need for utilities to construct additional generation, the costs of which may be borne (at least in part) by retail ratepayers. By reducing the need for utilities to construct new generation, co-locating data centers with third-party or customer-owned generation could help to further insulate ratepayers from additional costs.

Co-located generators—utility-owned or otherwise—may also be able to sell excess, low-cost renewable power back into the wholesale market, providing affordable energy to meet general consumer demand. Should Xcel amend the proposed tariffs to allow co-located generators to sell resources back to the utility or into the wholesale market, this Commission could investigate some type of rate to allow for this. And as noted above, co-location arrangements can reduce transmission congestion and/or the need to invest in additional transmission infrastructure, which likewise reduces costs.

C. Charting a Path to Co-Located Generation for Xcel's Tariffs

While Geronimo Power appreciates Xcel's efforts in developing its proposed tariffs for large data center users, it would be additionally beneficial to see measures that promote, incentivize, or even clearly authorize the use of co-located generation. Specifically, Xcel appears to authorize the use of standby service under its proposed Large General Time of Day Service tariff, but not under the proposed Large Peak Controlled Time of Day Service tariff.[27] It is also unclear whether the existing Standby Service Rider would accommodate co-located generation owned by a third party, since standby service generally only applies to customer-owned generation.[28] Xcel's existing Standby Service Rider is also unavailable to solar photovoltaic generation and is closed to new wind generation,[29] meaning new data centers may be unable to utilize renewable co-located generation (customer-owned or otherwise). The rules for Large Peak Controlled Services provide that "[a]ny load served by customer generation during Company requested control periods must be served by the Company at all other times,"[30] which appears to directly prohibit the use of co-located generation during non-peak control periods. Finally, it is unclear whether the proposed tariffs would permit a co-located generator to sell excess output

[26] *See, e.g.,* 190 FERC ¶ 61,115, ¶ 85; Analysis Group Report, at 9,
[27] Petition, Attachment A, at 12.
[28] *See* Northern States Power Company, Minnesota Electric Rate Book – MPUC No. 2, Standby Service Rider: Section No. 5, 23rd Revised Sheet No. 101 (describing rider as "[a]pplicable to customers that use a customer-sited generation source with a capacity greater than 100 kW to serve a defined portion of the customer's total electric energy requirements . . . .").
[29] *See* Northern States Power Company, Minnesota Electric Rate Book – MPUC No. 2, Standby Service Rider: Section No. 5, 23rd Revised Sheet No. 101 ("This Rider is not available to solar photovoltaic generation systems and is closed to new wind generation systems.").
[30] Petition, Attachment C, at 8.

back onto the grid—either to Xcel directly or into the wholesale market.

Geronimo respectfully requests the Commission direct Xcel to further modify these tariffs to more explicitly consider and authorize the use of co-located generation in serving data center customers. Specifically, the tariffs should explicitly authorize and encourage data center customers to meet some percentage of their load through co-located generation or traditional front-of-the-meter generation (utility owned or otherwise) that is geographically proximate to the load and aligns with the statutory requirements to which the state's investor-owned utilities are required to comply. Ideally, the tariffs would be agnostic to the commercial structure for the co-located generation and provide flexibility to accommodate the various approaches described earlier—i.e., self-supply, PPAs, or other alternative arrangements.

Granting data center customers the flexibility and incentive to use their commercial relationships and power to serve part of their own load via co-located generation reduces risks to Xcel and its customers. If these data center customers assume responsibility for serving a portion of their own load, then Xcel may not need to invest in as much incremental generation or other infrastructure that would otherwise be required to serve the customer's full load. This, in turn, will reduce Xcel's—and by extension, its customers'—risk exposure (e.g., to potentially stranded assets) in the event the full anticipated load does not materialize. Moreover, rather than being a consistent demand on the system, data center customers with their own generation would be in a better position to participate in peak shaving and demand response events, thereby reducing stressors on the overall system and providing more long-term economic and system benefits. Finally, to the extent data center customers rely on co-located *renewable* generation, there will likely be cost advantages to generators that can take advantage of federal tax credits that will soon be expiring; to the extent the customer or a third party can develop renewable resources quickly enough to claim the full value of these credits, this will reduce costs relative to generating resources that take longer to develop and construct.

While co-locating data centers with generation is not a panacea, this arrangement can deliver significant benefits to data center customers, Xcel, other ratepayers, and the electric grid more generally. The Commission should direct Xcel to modify and update its proposed tariffs so they more clearly authorize and encourage the use of co-located generation to serve large data center loads.

II. The Commission should direct Xcel to implement an expedited study process for interconnecting large data center loads with co-located generation.

Geronimo Power's understanding is that, in Xcel's service territory, the load interconnection process for new data centers occurs at several levels. First, the customer must contact and coordinate with the transmission owner and load-serving entity—in this case, Xcel—to develop a load interconnection agreement.[31] Xcel's proposed Retail Form IA indicates that the Company's *Interconnection Guidelines for Transmission Interconnected Customer Loads* applies to the customer's load interconnection request.[32] Under those guidelines, the customer submits a

[31] *See* MISO, *MISO Load Interconnection Whitepaper*, at 3 (Jul. 2023), *available at* https://tinyurl.com/5suj3ubs (hereinafter "MISO Load Interconnection Whitepaper").
[32] *See* Petition, Attachment H, at 8; *see also* Xcel Energy, *Interconnection Guidelines for Transmission Interconnected*

load interconnection request to Xcel, which then conducts system impact studies ("SIS") and facilities impact studies ("FIS"). These studies evaluate whether the transmission system has adequate capability to serve the new load and the detailed engineering design requirements and costs for interconnecting the new load.[33] Each individual study—i.e., the SIS and FIS—could take up to two months to complete, and at the conclusion of each study, the customer has 15 business days to decide whether it will proceed. This means the entire study process can take up to five months, and in some cases, potentially longer. After these studies are finished, Xcel and the customer negotiate and execute an IA.[34]

Second, if Xcel's study process determines that transmission upgrades are needed to interconnect the new customer, MISO and other stakeholders will independently review those upgrade projects through the transmission expansion planning ("MTEP") process.[35] This annual process lasts for approximately 18 months before approved projects are included in Appendix A to the MTEP, though there is a pathway for projects to undergo expedited review.[36] If the new data center customer wants to co-locate its facility with a new generating resource, MISO would need to study that resource through its separate generator interconnection queue—a process that has historically been subject to lengthy delays.[37]

While Xcel cannot control the MISO MTEP process or generator interconnection queue, it can take steps to expedite its own load interconnection process for new data centers. The Commission should therefore consider directing Xcel to develop a "fast lane" or expedited study process for new data center loads, including those that plan to utilize existing or new co-located generation resources. An expedited timeline for these customers is in the public interest because, by bringing their own resources to serve their load, these customers have demonstrated a clear intent to locate their operations in Minnesota and offset the need for additional utility-owned generation. This would be consistent with recent calls for MISO to analyze co-located data center load and generation as part of the same study process. If both Xcel and MISO adopted expedited study process for these resources, then it could reduce both network upgrade costs for new generators and existing backlogs and study timelines in the regional interconnection queue.[38]

III. Any new, incremental generation resources needed to serve new data center load should be vetted and approved by the Commission through transparent, competitive bidding processes.

Xcel states that it will use an incremental cost test ("ICT") "to confirm that the revenues from a new [data center customer] are larger than the incremental costs associated with the

Customer Loads (Version 15.0) (last updated Aug. 29, 2025), *available at* https://tinyurl.com/4pryvawt (hereinafter, "Xcel Interconnection Guidelines").

[33] *See generally* Xcel Interconnection Guidelines, at 24–27.

[34] *Id.*

[35] *Id.*; *see also* MISO Load Interconnection Whitepaper, at 3–4.

[36] *See MISO Transmission Expansion Plan (MTEP)* (last accessed Sept. 15, 2023), *available at* https://tinyurl.com/53s8axhr; MISO, *Business Practice Manual No. 020-r33: Transmission Planning*, at 63–66 (last updated Jul. 1, 2025), *available at* https://tinyurl.com/27z8nvcm.

[37] *See, e.g.*, Ka'Lena Cuevas, *How MISO is tackling generator interconnection queue challenges* (Jun. 13, 2025), *available at* https://tinyurl.com/4f69a8zh.

[38] *See, e.g.*, *id.*; *see also* Andrew Levitt et al., *Accelerating the Integration of New Co-located Generation and Loads*, at 1–6, The Brattle Group (Apr. 23, 2025), *available at* https://tinyurl.com/2tf6p4h5.

customer," that it will perform a resource planning analysis "to identify new incremental resources needed," and that "customers will be served as system customers, and the resources will be system resources."[39] Xcel has further indicated that, consistent with its past practice, any new resources identified through the foregoing resource planning analysis "will be acquired through existing acquisition processes, such as the Track 1 and Modified Track 2 process typically used to acquire new resources."[40]

Geronimo Power agrees that the Commission should vet and approve any new resources Xcel determines are needed to serve new data center customers through the competitive procurement processes it has historically utilized. As part of its evaluation criteria for these procurement processes, Xcel should include a scoring metric that favors or establishes a preference for generating resources that are both carbon-free and co-located with or geographically proximate to the new data center load. This will further incentivize the co-location of generation with data center loads, which produces numerous system and customer benefits, as explained earlier.

Finally, Xcel notes that if application of the ICT for a new data center customer indicates that revenues are projected to be lower than incremental costs, "then the customer and the Company will develop a proposal in the ESA to bring additional revenues, such that the incremental costs are paid for and a benefit is shown for system customers."[41] As noted earlier, Xcel has indicated that a key objective of its proposed tariffs is to ensure new large customers "pay their fair share" and "protect and provide benefits to other customers."[42] Geronimo Power encourages the Commission to direct Xcel to provide more clarity on what proposals or measures it would implement to ensure these new customers pay for the incremental costs of service, if the initial application of the ICT indicates that revenues from the customer are lower than the incremental costs of service.

CONCLUSION

Geronimo Power appreciates the Commission's consideration of these comments on the Company's proposal. Geronimo Power respectfully requests that the Commission consider and implement the following recommendations regarding Xcel's proposed tariffs:

1. Direct Xcel to modify the proposed tariffs to explicitly authorize and encourage data center customers to meet their load through co-located generation or traditional front-of-the-meter generation (utility owned or otherwise) that is geographically proximate to the load. The tariffs should be agnostic to the commercial structure for the co-located generation and provide flexibility to accommodate self-supply, PPA, VPPA, or other alternative arrangements that are consistent with Minnesota's regulated retail electric service market.

2. Direct Xcel to implement an expedited load interconnection study process for new

[39] Petition, at 18, 22.
[40] *Id.* at 22.
[41] *Id.* at 18.
[42] *Id.* at 16.

data center loads that would be co-located with new or existing generation.

3. Direct Xcel to establish a scoring metric that favors or prefers generating resources that would be co-located with or geographically proximate to data center customers in any future procurement proceeding in which Xcel seeks to acquire generating resources to serve those customer loads.

4. Direct Xcel to provide additional clarity on what proposals it would implement if the Company's ICT shows that new data center customers will generate revenues lower than their incremental costs.

Geronimo Power believes these recommendations will help mitigate cost risks to customers, streamline processes for interconnecting large data loads, optimize the efficient use of generation and transmission infrastructure in Minnesota, and support diverse and beneficial resource development

Dated: October 13, 2025

Respectfully submitted,

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CERTIFICATE OF SERVICE

I, David R. Zoppo, hereby certify that on this 13th day of October 2025, I e-filed with the eDocket System the following document(s) and have served copies of the same on the attached list of persons by electronic filing, electronic mail, or United States mail.

Initial Comments of Geronimo Power, LLC

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

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

Dated this 13th day of October, 2025.

/s/ David R. Zoppo

David R. Zoppo

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
1	Steve	Albrecht	steve.albrecht@shakopeedakota.org	Shakopee Mdewakanton Sioux Community		Shakopee Mdewakanton Sioux Community 2330 Sioux Trail NW Prior Lake MN, 55372 United States	Electronic Service		No	M-25-289
2	Jared	Alholinna	jalholinna@grenergy.com	Great River Energy		12300 Elm Creek Boulevard Maple Grove MN, 55369 United States	Electronic Service		No	M-25-289
3	Keith	Anderson	keith.anderson@shakopeedakota.org	Shakopee Mdewakanton Sioux Community		Shakopee Mdewakanton Sioux Community 2330 Sioux Trail NW Prior Lake MN, 55372 United States	Electronic Service		No	M-25-289
4	Shannon	Anderson	sanderson@solarunitedneighbors.org	Solar United Neighbors			Electronic Service		No	M-25-289
5	Beren	Argetsinger	bargetsinger@keyesfox.com			PO BOX 166 Burdett NY, 14818 United States	Electronic Service		No	M-25-289
6	Ray	Auginaush, Sr.	ray.auginaush@whiteearth-nsn.gov	White Earth Nation		White Earth Tribal Headquarters 35500 Eagle View Road Ogema MN, 56569 United States	Electronic Service		No	M-25-289
7	Mark	Bakk	mbakk@lcp.coop	Lake Country Power		26039 Bear Ridge Drive Cohasset MN, 55721 United States	Electronic Service		No	M-25-289
8	Daniel	Becchetti	dbecchetti@grenergy.com	Great River Energy		12300 Elm Creek Boulevard Maple Grove MN, 55369 United States	Electronic Service		No	M-25-289
9	Todd	Beck	tbeck@grenergy.com			null null, null United States	Electronic Service		No	M-25-289
10	Amadeo	Bellino	amadeo.bellino@whiteearth-nsn.gov	White Earth Nation		White Earth Tribal Headquarters 35500 Eagle View Road Ogema MN, 56569 United States	Electronic Service		No	M-25-289
11	Melanie	Benjamin	melanie.benjamin@millelacsband.com			43408 Oodena Drive Onamia MN, 56359 United States	Electronic Service		No	M-25-289
12	Sasha	Bergman	sasha.bergman@state.mn.us		Public Utilities Commission		Electronic Service		Yes	M-25-289
13	Laura	Bishop	laura.bishop@state.mn.us		Minnesota Pollution Control Agency	520 Lafayette Rd Saint Paul MN, 55155 United States	Electronic Service		No	M-25-289
14	Ingrid	Bjorklund	ingrid@bjorklundlaw.com	Bjorklund Law, PLLC		855 Village Center Drive #256	Electronic Service		No	M-25-289

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						North Oaks MN, 55127 United States				
15	Hunter	Boldt	hunterboldt@redlakenation.org	Red Lake Nation		15484 Migizi Drive Red Lake MN, 56671 United States	Electronic Service		No	M-25-289
16	Peter	Boney	pboney@boisforte-nsn.gov	Bois Forte Band of Chippewa		Bois Forte Tribal Government 5344 Lakeshore Drive Nett Lake MN, 55772 United States	Electronic Service		No	M-25-289
17	Sheldon	Boyd	sheldon.boyd@millelacsband.com	Mille Lacs Band of Ojibwe		43408 Oodena Drive Onamia MN, 56359 United States	Electronic Service		No	M-25-289
18	Jon	Brekke	jbrekke@grenergy.com	Great River Energy		12300 Elm Creek Boulevard Maple Grove MN, 55369-4718 United States	Electronic Service		No	M-25-289
19	Matthew	Brodin	mbrodin@allete.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	M-25-289
20	B. Andrew	Brown	brown.andrew@dorsey.com	Dorsey & Whitney LLP		Suite 1500 50 South Sixth Street Minneapolis MN, 55402-1498 United States	Electronic Service		No	M-25-289
21	Marvin Ray	Bruneau	marvin.bruneau@millelacsband.com	Mille Lacs Band of Ojibwe		43408 Oodena Drive Onamia MN, 56359 United States	Electronic Service		No	M-25-289
22	Christina	Brusven	cbrusven@fredlaw.com	Fredrikson Byron		60 S 6th St Ste 1500 Minneapolis MN, 55402-4400 United States	Electronic Service		No	M-25-289
23	Scott	Buchanan	scottbuchanan@fdlrez.com	Fond du Lac Band of Lake Superior Chippewa		1720 Big Lake Road Cloquet MN, 55720 United States	Electronic Service		No	M-25-289
24	Shelley	Buck	shelley.buck@piic.org	Prairie Island Indian Community		Prairie Island Indian Community 5636 Sturgeon Lake Road Welch MN, 55089 United States	Electronic Service		No	M-25-289
25	Robert	Budreau	robert.budreau@llojibwe.net	Leech Lake Band of Ojibwe		190 Sailstar Drive NW Cass Lake MN, 56633 United States	Electronic Service		No	M-25-289
26	Mike	Bull	mike.bull@state.mn.us		Public Utilities Commission	121 7th Place East, Suite 350 St. Paul MN,	Electronic Service		Yes	M-25-289

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						55101 United States				
27	Cathy	Chavers	cchavers@boisforte-nsn.gov	Bois Forte Band of Chippewa		Bois Forte Tribal Government 5344 Lakeshore Drive Nett Lake MN, 55772 United States	Electronic Service		No	M-25-289
28	Marc	Child	mchild@grenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	M-25-289
29	Michael	Childs, Jr.	michael.childsjr@piic.org	Prairie Island Indian Community		Prairie Island Indian Community 5636 Sturgeon Lake Road Welch MN, 55089 United States	Electronic Service		No	M-25-289
30	John	Coffman	john@johncoffman.net	AARP		871 Tuxedo Blvd. St, Louis MO, 63119-2044 United States	Electronic Service		No	M-25-289
31	Generic	Commerce Attorneys	commerce.attorneys@ag.state.mn.us		Office of the Attorney General - Department of Commerce	445 Minnesota Street Suite 1400 St. Paul MN, 55101 United States	Electronic Service		Yes	M-25-289
32	George	Crocker	gwillc@nawo.org	North American Water Office		5093 Keats Avenue Lake Elmo MN, 55042 United States	Electronic Service		No	M-25-289
33	Rebecca	Crooks Stratton	rebecca.crooks-stratton@shakopeedakota.org	Shakopee Mdewakanton Sioux Community		Shakopee Mdewakanton Sioux Community 2330 Sioux Trail NW Prior Lake MN, 55372 United States	Electronic Service		No	M-25-289
34	Brooke	Cunningham	health.review@state.mn.us	Minnesota Department of Health		PO Box 64975 St. Paul MN, 55164-0975 United States	Electronic Service		No	M-25-289
35	Miyah	Danielson	miyahdanielson@fdlrez.com	Fond du Lac Band of Lake Superior Chippewa		1720 Big Lake Road Cloquet MN, 55720 United States	Electronic Service		No	M-25-289
36	Jason	Decker	jason.decker@llojibwe.net	Leech Lake Band of Ojibwe		190 Sailstar Drive NW Cass Lake MN, 56633 United States	Electronic Service		No	M-25-289
37	Bobby	Deschampe	robertdeschampe@grandportage.com	Grand Portage Band of Lake Superior Chippewa		PO Box 428 Grand Portage MN, 55605 United States	Electronic Service		No	M-25-289
38	Kami	Diver	kamidiver@fdlrez.com	Fond du Lac Band of Lake Superior Chippewa		1720 Big Lake Road Cloquet MN, 55720 United States	Electronic Service		No	M-25-289

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
39	Becky	Dobbs	bdobbs@grenergy.com			null null, null United States	Electronic Service		No	M-25-289
40	Ian M.	Dobson	ian.m.dobson@xcelenergy.com	Xcel Energy		414 Nicollet Mall, 401-8 Minneapolis MN, 55401 United States	Electronic Service		No	M-25-289
41	Shane	Drift	sdrift@boisforte-nsn.gov	Bois Forte Band of Chippewa		Bois Forte Tribal Government 5344 Lakeshore Drive Nett Lake MN, 55772 United States	Electronic Service		No	M-25-289
42	Christopher	Droske	christopher.droske@minneapolismn.gov	Northern States Power Company dba Xcel Energy-Elec		661 5th Ave N Minneapolis MN, 55405 United States	Electronic Service		No	M-25-289
43	Adam	Duininck	aduininck@ncsrcc.org	North Central States Regional Council of Carpenters		700 Olive Street St. Paul MN, 55130 United States	Electronic Service		No	M-25-289
44	Wally	Dupuis	wallydupuis@fdlband.org	Fond du Lac Band of Lake Superior Chippewa		1720 Big Lake Road Cloquet MN, 55720 United States	Electronic Service		No	M-25-289
45	Kevin	Dupuis, Sr.	kevindupuis@fdlrez.com			Reservation Business Committee 1720 Big Lake Rd Cloquet MN, 55720 United States	Electronic Service		No	M-25-289
46	Jamie	Edwards	jamie.edwards@millelacsband.com	Mille Lacs Band of Ojibwe		43408 Oodena Drive Onamia MN, 56358 United States	Electronic Service		No	M-25-289
47	Michael	Fairbanks	michael.fairbanks@whiteearth-nsn.gov	White Earth Reservation Business Committee		PO Box 418 White Earth MN, 56591 United States	Electronic Service		No	M-25-289
48	John	Farrell	jfarrell@ilsr.org	Institute for Local Self-Reliance		2720 E. 22nd St Institute for Local Self-Reliance Minneapolis MN, 55406 United States	Electronic Service		No	M-25-289
49	Sharon	Ferguson	sharon.ferguson@state.mn.us		Department of Commerce	85 7th Place E Ste 280 Saint Paul MN, 55101-2198 United States	Electronic Service		No	M-25-289
50	Terri	Finn	terri.goggleye@llojibwe.net			null null, null United States	Electronic Service		No	M-25-289
51	Christine	Fox	cfox@itasca-mantrap.com	Itasca-Mantrap Coop. Electric Assn.		PO Box 192 Park Rapids MN, 56470 United States	Electronic Service		No	M-25-289
52	Lucas	Franco	lfranco@liunagroc.com	LIUNA		81 Little Canada Rd E Little Canada MN, 55117 United States	Electronic Service		No	M-25-289

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
53	Gary	Frazer	gfrazer@mnchippewatribe.org	Minnesota Chippewa Tribe		PO Box 217 Cass Lake MN, 56633 United States	Electronic Service		No	M-25-289
54	Stacey	Fujii	sfujii@grenergy.com	Great River Energy		12300 Elm Creek Boulevard Maple Grove MN, 55369-4718 United States	Electronic Service		No	M-25-289
55	Edward	Garvey	garveyed@aol.com	Residence		32 Lawton St Saint Paul MN, 55102 United States	Electronic Service		No	M-25-289
56	Shannon	Geshick	shannon.geshick@state.mn.us	Minnesota Indian Affairs Council (MIAC)		null null, null United States	Electronic Service		No	M-25-289
57	Allen	Gleckner	gleckner@fresh-energy.org	Fresh Energy		408 St. Peter Street Ste 350 Saint Paul MN, 55102 United States	Electronic Service		No	M-25-289
58	Jeffrey	Haase	jhaase@grenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	M-25-289
59	Hal	Halpern	halhalpern@clpower.com	Cooperative Light & Power		1554 Hwy 2 P0 Box 69 Two Harbors MN, 55616 United States	Electronic Service		No	M-25-289
60	Jeremy	Hamilton	jhamilton@uppersiouxcommunity-nsn.gov	Upper Sioux Community		Upper Sioux Community PO Box 147 Granite Falls MN, 56241 United States	Electronic Service		No	M-25-289
61	David A.	Hansen	hansen@federatedrea.coop	Federated Rural Electric Association		77100 U.S. Highway 71 PO Box 69 Jackson MN, 56143 United States	Electronic Service		No	M-25-289
62	Amy	Hastings	amyh@uppersiouxcommunity-nsn.gov	Upper Sioux Community		5722 Travers Lane PO Box 147 Granite Falls MN, 56241 United States	Electronic Service		No	M-25-289
63	Erik	Hatlestad	erik@cureriver.org			117 1st St Montevideo MN, 56265 United States	Electronic Service		No	M-25-289
64	Adam	Heinen	aheinen@dakotaelectric.com	Dakota Electric Association		4300 220th St W Farmington MN, 55024 United States	Electronic Service		No	M-25-289
65	Kristin	Henry	kristin.henry@sierraclub.org	Sierra Club		2101 Webster St Ste 1300 Oakland CA, 94612 United States	Electronic Service		No	M-25-289
66	Michael	Hoppe	lu23@ibew23.org	Local Union 23, I.B.E.W.		445 Etna Street Ste. 61 St. Paul MN, 55106 United States	Electronic Service		No	M-25-289

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
67	Ronald	Horman	rhorman@redwoodelectric.com	Redwood Electric Cooperative		60 Pine Street Clements MN, 56224 United States	Electronic Service		No	M-25-289
68	Robbie	Howe	robbie.howe@llojibwe.net	Leech Lake Band of Ojibwe		190 Sailstar Drive NW Cass Lake MN, 56633 United States	Electronic Service		No	M-25-289
69	John	Ihle	ljihle@rrt.net	PlainStates Energy LLC		27451 S Hwy 34 Barnesville MN, 56514 United States	Electronic Service		No	M-25-289
70	Annie	Jackson	cheryl.jackson@whiteearth-nsn.gov	White Earth Nation		White Earth Tribal Headquarters 35500 Eagle View Road Ogemo MN, 56569 United States	Electronic Service		No	M-25-289
71	Faron	Jackson, Sr.	faron.jackson@llojibwe.net			190 Sailstar Drive NW Cass Lake MN, 56633 United States	Electronic Service		No	M-25-289
72	Justin	Jahnz	justin.jahnz@ecemn.com	East Central Energy		412 Main Ave N Braham MN, 55006 United States	Electronic Service		No	M-25-289
73	Alan	Jenkins	aj@jenkinsatlaw.com	Jenkins at Law		2950 Yellowtail Ave. Marathon FL, 33050 United States	Electronic Service		No	M-25-289
74	Kevin	Jensvold	kevinj@uppersiouxcommunity-nsn.gov	Upper Sioux Community		PO Box 147 Granite Falls MN, 56241-0147 United States	Electronic Service		No	M-25-289
75	Annette	Johnson	annette.johnson@redlakenation.org	Red Lake Nation		15484 Migizi Drive Red Lake MN, 56671 United States	Electronic Service		No	M-25-289
76	Jody	Johnson	jody.johnson@piic.org	Prairie Island Indian Community		5636 Sturgeon Lake Rd Welch MN, 55089 United States	Electronic Service		No	M-25-289
77	Richard	Johnson	rick.johnson@lawmoss.com	Moss & Barnett		150 S. 5th Street Suite 1200 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-289
78	Sarah	Johnson Phillips	sjphillips@stoel.com	Stoel Rives LLP		33 South Sixth Street Suite 4200 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-289
79	Mark	Kaminski	mark.kaminski@gsa.gov	General Services Administration		1800 F Street NW Washington DC, 20405 United States	Electronic Service		No	M-25-289
80	Veda	Kanitz	vmkanitz@gmail.com			null null, null United States	Electronic Service		No	M-25-289

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
81	Jenny	Kartes	jkartes@arrowhead.coop	Arrowhead Electric Cooperative, Inc.(P)		PO Box 39 5401 W Hwy 61 Lutsen MN, 55612 United States	Electronic Service		No	M-25-289
82	David	Kempf	dkempf@grenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	M-25-289
83	William	Kenworthy	will@votesolar.org			1 South Dearborn St Ste 2000 Chicago IL, 60603 United States	Electronic Service		No	M-25-289
84	Bobby	King	bking@solarunitedneighbors.org	Solar United Neighbors		3140 43rd Ave S Minneapolis MN, 55406 United States	Electronic Service		No	M-25-289
85	Therese	LaCanne	tlacanne@grenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	M-25-289
86	Matthew	Lacey	mlacey@grenergy.com	Great River Energy		12300 Elm Creek Boulevard Maple Grove MN, 55369-4718 United States	Electronic Service		No	M-25-289
87	Arthur	LaRose	arthur.larose@llojibwe.net	Leech Lake Band of Ojibwe		190 Sailstar Drive NW Cass Lake MN, 56633 United States	Electronic Service		No	M-25-289
88	Robert L	Larsen	robert.larsen@lowersioux.com	Lower Sioux Indian Community		PO Box 308 39527 Reservation Highway 1 Morton MN, 56270 United States	Electronic Service		No	M-25-289
89	Mark	Larson	mlarson@meeker.coop	Meeker Coop Light & Power Assn		1725 Highway 12 E Ste 100 Litchfield MN, 55355 United States	Electronic Service		No	M-25-289
90	Michelle	Larson	michelle@redwingchamber.com	Red Wing Area Chamber of Commerce		439 Main Street Red Wing, MN Bay Point Park MN, 55066 United States	Electronic Service		No	M-25-289
91	Peder	Larson	plarson@larkinhoffman.com	Larkin Hoffman Daly & Lindgren, Ltd.		8300 Norman Center Drive Suite 1000 Bloomington MN, 55437 United States	Electronic Service		No	M-25-289
92	Dan	Lesher	dlesher@grenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	M-25-289
93	Michelle	Lommel	mlommel@grenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	M-25-289

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
94	Kavita	Maini	kmaini@wi.rr.com	KM Energy Consulting, LLC		961 N Lost Woods Rd Oconomowoc WI, 53066 United States	Electronic Service		No	M-25-289
95	Christine	Marquis	regulatory.records@xcelenergy.com	Xcel Energy		414 Nicollet Mall MN1180-07-MCA Minneapolis MN, 55401 United States	Electronic Service		Yes	M-25-289
96	Shena	Matrious	shena.matrious@millelacsband.com	Mille Lacs Band of Ojibwe		43408 Oodena Drive Onamia MN, 56349 United States	Electronic Service		No	M-25-289
97	April	McCormick	aprilm@grandportage.com	Grand Portage Band of Lake Superior Chippewa		PO Box 428 Grand Portage MN, 55605 United States	Electronic Service		No	M-25-289
98	Ronald	Meier	rmeier@mcleodcoop.com	Mcleod Cooperative Power		3515 11th St East Glencoe MN, 55336 United States	Electronic Service		No	M-25-289
99	Peder	Mewis	pmewis@cleangridalliance.org	Clean Grid Alliance		570 Asbury St. St. Paul MN, 55104 United States	Electronic Service		No	M-25-289
100	Valentina	Mgeni	valentina.mgeni@piic.org	Prairie Island Indian Community		Prairie Island Indian Community 5636 Sturgeon Lake Road Welch MN, 55089 United States	Electronic Service		No	M-25-289
101	Cole W.	Miller	cole.miller@shakopeedakota.org	Shakopee Mdewakanton Sioux Community		Shakopee Mdewakanton Sioux Community 2330 Sioux Trail NW Prior Lake MN, 55372 United States	Electronic Service		No	M-25-289
102	Stacy	Miller	stacy.miller@minneapolismn.gov	City of Minneapolis		350 S. 5th Street Room M 301 Minneapolis MN, 55415 United States	Electronic Service		No	M-25-289
103	David	Moeller	dmoeller@allete.com	Minnesota Power			Electronic Service		No	M-25-289
104	Sarah	Mooradian	sarah@curemn.org	CURE		117 South 1st Street Montevideo MN, 56265 United States	Electronic Service		No	M-25-289
105	Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP		33 South Sixth St Ste 4200 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-289
106	Travis	Morrision	travis.morrison@boisforte-nsn.gov	Bois Forte Band of Chippewa		Bois Forte Tribal Government 5344 Lakeshore Drive Nett Lake	Electronic Service		No	M-25-289

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						MN, 55772 United States				
107	David	Morrison, Sr.	david.morrison@boisforte-nsn.gov	Bois Forte Band of Chippewa		Bois Forte Tribal Government 5344 Lakeshore Drive Nett Lake MN, 55772 United States	Electronic Service		No	M-25-289
108	Evan	Mulholland	emulholland@mncenter.org	Minnesota Center for Environmental Advocacy		1919 University Ave W Ste 515 Saint Paul MN, 55101 United States	Electronic Service		No	M-25-289
109	Sonny	Myers	smyers@1854treatyauthority.org	1854 Treaty Authority		4428 Haines Rd Duluth MN, 55811-1524 United States	Electronic Service		No	M-25-289
110	Pouya	Najmaie	najm0001@gmail.com	Cooperative Energy Futures		3416 16th Ave S Minneapolis MN, 55407 United States	Electronic Service		No	M-25-289
111	Carl	Nelson	cnelson@mncee.org	Center for Energy and Environment		212 3rd Ave N Ste 560 Minneapolis MN, 55401 United States	Electronic Service		No	M-25-289
112	Deb	Nelson	dnelson@grenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	M-25-289
113	David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency		220 South Sixth Street Suite 1300 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-289
114	Duane	Ninneman	duane@cureriver.org	Clean Up the River Environment		117 South 1st St Montevideo MN, 56265 United States	Electronic Service		No	M-25-289
115	Logan	O'Grady	logrady@mnseia.org	Minnesota Solar Energy Industries Association		2288 University Ave W St. Paul MN, 55114 United States	Electronic Service		No	M-25-289
116	Joseph	OBrien	joey.obrien@lowersioux.com			39527 Highway 1 Morton MN, 56270 United States	Electronic Service		No	M-25-289
117	Carol A.	Overland	overland@legalectric.org	Legalectric - Overland Law Office		1110 West Avenue Red Wing MN, 55066 United States	Electronic Service		No	M-25-289
118	Gregory	Padden	gpadden@grenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	M-25-289
119	Jessica	Palmer Denig	jessica.palmer-denig@state.mn.us		Office of Administrative Hearings	600 Robert St N PO Box 64620 St. Paul MN,	Electronic Service		No	M-25-289

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						55164 United States				
120	Marsha	Parlow	mparlow@grenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	M-25-289
121	Priti	Patel	ppatel@grenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369-4718 United States	Electronic Service		No	M-25-289
122	Earl	Pendleton	earl.pendleton@lowersioux.com	Lower Sioux Indian Community		39527 Highway 1 Morton MN, 56270 United States	Electronic Service		No	M-25-289
123	Gordon	Pietsch	gpietsch@grenergy.com	Great River Energy		12300 Elm Creek Blvd. Maple Grove MN, 55369-4718 United States	Electronic Service		No	M-25-289
124	Joe	Plumer	joe.plumer@redlakenation.org	Red Lake Nation		15484 Migizi Drive Red Lake MN, 56671 United States	Electronic Service		No	M-25-289
125	Kevin	Pranis	kpranis@liunagroc.com	Laborers' District Council of MN and ND		81 E Little Canada Road St. Paul MN, 55117 United States	Electronic Service		No	M-25-289
126	Robert	Prescott	bob.prescott@lowersioux.com	Lower Sioux Indian Community		39527 Highway 1 Morton MN, 56270 United States	Electronic Service		No	M-25-289
127	Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	1400 BRM Tower 445 Minnesota St St. Paul MN, 55101-2131 United States	Electronic Service		Yes	M-25-289
128	Kevin	Reuther	kreuther@mncenter.org	MN Center for Environmental Advocacy		26 E Exchange St, Ste 206 St. Paul MN, 55101-1667 United States	Electronic Service		No	M-25-289
129	Stephan	Roos	stephan.roos@state.mn.us		Minnesota Department of Agriculture	625 Robert St N Saint Paul MN, 55155-2538 United States	Electronic Service		No	M-25-289
130	Alan	Roy	alan.roy@whiteearth-nsn.gov	White Earth Nation		White Earth Tribal Headquarters 35500 Eagle View Road Ogema MN, 56569 United States	Electronic Service		No	M-25-289
131	Bill	Rudnicki	bill.rudnicki@shakopeedakota.org	Shakopee Mdewakanton Sioux Community		Shakopee Mdewakanton Sioux Community 2330 Sioux Trail NW Prior Lake MN, 55372 United States	Electronic Service		No	M-25-289

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132	Nathaniel	Runke	nrunke@local49.org			611 28th St. NW Rochester MN, 55901 United States	Electronic Service		No	M-25-289
133	Zachary	Ruzycki	zruzycki@grenergy.com	Great River Energy		12300 Elm Creek Boulevard Maple Grove MN, 55369 United States	Electronic Service		No	M-25-289
134	Miranda	Sam	miranda.sam@lowersioux.com	Lower Sioux Indian Community		39527 Reservation Highway 1 PO Box 308 Morton MN, 56270 United States	Electronic Service		No	M-25-289
135	Adam	Savariego	adams@uppersiouxcommunity-nsn.gov	Upper Sioux Community		5722 Travers Lane PO Box 147 Granite Falls MN, 56241 United States	Electronic Service		No	M-25-289
136	Ronald J.	Schwartau	rschwartau@noblesce.com	Nobles Electric Cooperative		22636 U.S. Hwy. 59 Worthington MN, 56187 United States	Electronic Service		No	M-25-289
137	Jessie	Seim	jessie.seim@piic.org	Prairie Island Indian Community		5636 Sturgeon Lake Rd Welch MN, 55089 United States	Electronic Service		No	M-25-289
138	Darrell	Seki, Sr.	dseki@redlakenation.org			15484 Migizi Drive Red Lake MN, 56671 United States	Electronic Service		No	M-25-289
139	Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates		7400 Lyndale Ave S Ste 190 Richfield MN, 55423 United States	Electronic Service		No	M-25-289
140	Joel	Smith	jsmith@mnchippewatribe.org	Minnesota Chippewa Tribe		PO Box 217 Cass Lake MN, 56633 United States	Electronic Service		No	M-25-289
141	Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.		76 W Kellogg Blvd St. Paul MN, 55102 United States	Electronic Service		No	M-25-289
142	Nizhoni	Smith	nizhoni.smith@lowersioux.com	Lower Sioux Indian Community		PO Box 308 39527 Reservation Highway 1 Morton MN, 56270 United States	Electronic Service		No	M-25-289
143	Roger	Smith, Sr.	rogermsmithsr@fdlrez.com			1720 Big Lake Road Cloquet MN, 55720 United States	Electronic Service		No	M-25-289
144	Beth	Soholt	bsoholt@cleangridalliance.org	Clean Grid Alliance		570 Asbury Street Suite 201 St. Paul MN, 55104 United States	Electronic Service		No	M-25-289
145	Marie	Spry	mariespry@grandportage.com			PO Box 428 Grand	Electronic Service		No	M-25-289

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146	Michael	Stalberger	michael.stalberger@blueearthcountymn.gov	Blue Earth County		410 S 5th Street Mankato MN, 56001 United States	Electronic Service		No	M-25-289
147	LeRoy	Staples Fairbanks III	leroy.fairbanks@llojibwe.net	Leech Lake Band of Ojibwe		190 Sailstar Drive NW Cass Lake MN, 56633 United States	Electronic Service		No	M-25-289
148	Byron E.	Starns	byron.starns@stinson.com	STINSON LLP		50 S 6th St Ste 2600 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-289
149	Mark	Strohfus	mstrohfus@grenergy.com	Great River Energy		12300 Elm Creek Boulevard Maple Grove MN, 55369-4718 United States	Electronic Service		No	M-25-289
150	Samuel	Strong	sam.strong@redlakenation.org	Red Lake Nation		15484 Migizi Drive Red Lake MN, 56671 United States	Electronic Service		No	M-25-289
151	Timothy	Sullivan	tsullivan@whe.org	Wright Hennepin Coop. Electric Assn.		6800 Electric Drive PO Box 330 Rockford MN, 55373 United States	Electronic Service		No	M-25-289
152	David	Sunderman	daves@benco.org	BENCO (DUPLICATE)		PO Box 8 Mankato MN, 56002-0008 United States	Electronic Service		No	M-25-289
153	Camille	Tanhoff	kamip@uppersiouxcommunity-nsn.gov	Upper Sioux Community		5722 Travers Lane PO BOX 147 Granite Falls MN, 56241 United States	Electronic Service		No	M-25-289
154	Tim	Thompson	tthompson@lrec.coop	Lake Region Electric Cooperative		PO Box 643 1401 South Broadway Pelican Rapids MN, 56572 United States	Electronic Service		No	M-25-289
155	Geoffrey	Tolley	geoff.tolley@gmail.com			855 Stanley Road Two Harbors MN, 55616-1176 United States	Electronic Service		No	M-25-289
156	Caralyn	Trutna	carrie@uppersiouxcommunity-nsn.gov	Upper Sioux Community		Upper Sioux Community P.O. Box 147 Granite Falls MN, 55372 United States	Electronic Service		No	M-25-289
157	Jackie	Van Norman	jvannorman@grenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	M-25-289
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160	Amelia	Vohs	avohs@mncenter.org	Minnesota Center for Environmental Advocacy		1919 University Avenue West Suite 515 St. Paul MN, 55104 United States	Electronic Service		No	M-25-289
161	Trent	Waite	twaite@grenergy.com			null null, null United States	Electronic Service		No	M-25-289
162	Heather	Westra	heather.westra@piic.org	Prairie Island Indian Community		5636 Sturgeon Lake Rd Welch MN, 55089 United States	Electronic Service		No	M-25-289
163	Steve	White	steve.white@llojibwe.net	Leech Lake Band of Ojibwe		190 Sailstar Drive NW Cass Lake MN, 56633 United States	Electronic Service		No	M-25-289
164	Cody	Whitebear	cody.whitebear@piic.org	Prairie Island Indian Community		5636 Sturgeon Lake Road Welch MN, 55089 United States	Electronic Service		No	M-25-289
165	John	Williams	jwilliams@grenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	M-25-289
166	Virgil	Wind	virgil.wind@millelacsband.com	Mille Lacs Band of Ojibwe		43408 Oodena Drive Onamia MN, 56359 United States	Electronic Service		No	M-25-289
167	Joseph	Windler	jwindler@winthrop.com	Winthrop & Weinstine		225 South Sixth Street, Suite 3500 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-289
168	Laurie	York	laurie.york@whiteearth-nsn.gov	White Earth Reservation Business Committee		PO Box 418 White Earth MN, 56591 United States	Electronic Service		No	M-25-289
169	Curtis	Zaun	czaun@mnseia.org	MnSEIA		PO Box 8141 Saint Paul MN, 55108 United States	Electronic Service		No	M-25-289
170	Kurt	Zimmerman	kwz@ibew160.org	Local Union #160, IBEW		2909 Anthony Ln St Anthony Village MN, 55418-3238 United States	Electronic Service		No	M-25-289
171	Patrick	Zomer	pat.zomer@lawmoss.com	Moss & Barnett PA		150 S 5th St #1200 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-289