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March 20, 2014

Burl W. Haar
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, Minnesota 55101-2147

RE: Comments of the Minnesota Department of Commerce, Division of Energy Resources
Docket No. E999/M-13-402

Dear Dr. Haar:

Attached are the response comments of the Minnesota Department of Commerce, Division of Energy Resources (Department) in the following matter:

2013 Biennial Transmission Projects Report.

The petition was filed on November 1, 2013. The petitioner is:

Alan R. Mitchell
Fredrikson & Byron, P.A.
200 South Sixth Street, #4000
Minneapolis, MN 55402-1425

With the information provided by the Transmission Owners in their March 3, 2014 reply comments, the Department recommends approval of the 2013 Biennial Transmission Report.

Sincerely,

/s/ HOLLY LAHD
Rates Analyst

HL/lt
Attachment



BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

**RESPONSE COMMENTS OF THE
MINNESOTA DEPARTMENT OF COMMERCE
DIVISION OF ENERGY RESOURCES**

DOCKET No. E999/M-13-402

I. INTRODUCTION

The Minnesota Department of Commerce, Division of Energy Resources' (Department) January 14, 2014 comments on the 2013 Minnesota Transmission Projects Report (Biennial Report) requested that the Minnesota Transmission Owners (MTO) provide certain data. MTO provided the requested data in MTO's March 3, 2014 reply comments. The Department reviewed MTO's data and provides the following response.

II. ANALYSIS

In its comments, the Department recommended that the Commission approve the 2013 Report but requested that the MTO provide certain additional information in its Reply Comments. The Department specifically requested that the following information be included:

- An explanation of why the completion date for the Savanna Project (Tracking Number 2003-NE-N2) has been extended from the earlier proposed 2013 date to 2015.
- Charts from Great River Energy showing the critical load level and the drop in the load growth for six projects identified by the Department and a statement indicating how fast GRE can complete each project once load growth returns.
- A description of the plans that each utility subject to the Solar Energy Standard has to integrate new solar projects into its distribution and transmission system.

A. SAVANNA PROJECT DATE

The Savanna Project was first reported in the 2003 Biennial Report and updated in subsequent reports. The Savanna Project is a joint project of Minnesota Power and Great River Energy (GRE). It involves construction of a new 115 kV switching station near Floodwood, Minnesota, and a rebuild of 37 miles of 69 kV line to 115 kV.

Minnesota Power's portion of the Savanna Project (the Savanna 115 kV Switching Station) was completed in the fall 2013. GRE's Savanna to Cedar Valley section of the 115kV line project was completed at the same time as MP's Savanna Substation.

Construction of the Savanna to Cromwell Breaker Station section was started in December 2013 and is expected to be completed in May of 2015. Delay was due to the need to build the transmission line over multiple winter seasons due to lowland areas.

The Department reviewed the data provided by MTO and concludes that no further action is necessary at this time.

B. GRE CRITICAL LOAD GROWTH LEVELS

Second, GRE provided information requested by the Department regarding potential inadequacies reported in six different tracking numbers. GRE's data indicates although there has been load growth for two of the potential inadequacies since 2011, the 2013 load is still significantly below the critical levels that suggest a need for an upgrade.¹

Load data for three of the tracking numbers shows little change in load over the past 3 years.² The sixth potential inadequacy (2009-TC-N5 Carver County-Belle Plaine 115 kV line) will be reassessed after the completion of the e Glendale-Lake Marion-Helena 115 kV project (Tracking No. 2009-TC-N2); GRE did not provide a critical load level for this tracking number. A certificate of need application has been filed for the Glendale-Lake Marion-Helena line.

This new data indicates that GRE is making adequate progress towards resolving these six inadequacies.

C. SOLAR ENERGY TRANSMISSION AND DISTRIBUTION PLANNING

The Department requested that the MTO, in reply comments, provide information on utilities subject to the Solar Energy Standard provide information on their plans to efficiently integrate new solar projects on their distribution and transmission systems.

¹ The tracking numbers where load growth has occurred since 2011 are 2003-NE-N6 and 2009-NE-N11.

² The tracking numbers where load has remained flat since 2011 are 2009-NE-N4, 2009-NE-N6, and 2003-WC-N8.

Minnesota Power, Otter Tail Power, and Xcel Energy all provided high level responses to the Department's request. The MTO also notes that the investor-owned utilities (IOUs), which are subject to the solar energy standard, will be filing a complete report with the Commission by July 1, 2014, as required by the new law, on their progress in achieving the standard. The Department looks forward to reviewing the IOU's solar energy standard reports to learn more about their plans to integrate solar energy into their systems.

D. MITIGATION COSTS

The Department requested that information regarding mitigation costs involved in routing or siting processes be provided in future rate cases. The IOUs indicated in their reply comments that they do not object to the Commission reiterating that in future cost recovery proceedings the Commission will consider whether mitigation measures were voluntary or not. However, the IOUs believe it would be inappropriate for the Commission to go beyond that general statement at this time. The IOUs indicated that recovery of mitigation costs is best addressed on a case by case basis in transmission rider cost recovery (TCR) filings or in future rate cases and that the Biennial Report docket is not the best place to attempt to establish specific guidance to be used in future rate proceedings.

The Department finds value in understanding mitigation costs and best practices for transmission planning purposes. The Department does not dispute MTO's position that this mitigation cost information can be reviewed in individual rate cases. However, mitigation measures may not need to be reviewed in rate cases and riders unless there are concerns about those costs identified in other planning dockets. The best way to get an understanding of what mitigation costs are typically included in transmission projects is to get such data in the Biennial Report. By getting some data on this from all utilities the Department and Commission can better:

- identify best practices across utilities;
- incorporate mitigation costs in CNs; and
- review rate case requests.

Thus, considering MTO's reply comments, the Department is modifying the request so as to make it more in-line with the purposes of the docket and MTO's comments. The Department now recommends that all MTO utilities – IOUs, cooperatives, and municipal utilities – provide the following information related to mitigation measures in future transmission reports:

- A summary of all mitigation measures that have been added at any step in the permitting process, including a list of all voluntary measures;
- The general reason for the mitigation measure, including whether the measure was requested or required;
- The entity requesting or requiring the mitigation; and
- The cost of the mitigation measure.

The MTO is correct that the Commission did not act on the Department's mitigation cost recommendation in the 2011 Biennial Report docket. However, the Commission not acting on the Department's recommendation for reporting of mitigation measures does not constitute denial of this request, but rather no action at that time. The Department continues to recommend that the MTO provide mitigation information because absent this information, the Commission may be unable to assess whether to ensure mitigation measures and costs are reasonable and appropriate.

In addition, the Department puts the MTO on notice that the Department intends to request in future certificate of need petitions that utilities identify the amount of mitigation costs included in their proposals.

III. 2015 BIENNIAL TRANSMISSION REPORT

In its reply comments, the MTO recommended changes to the next Biennial Report content and process requirements. The Department appreciates the MTO's thoughts on how to make the Biennial Report more valuable.

The original goal of the biennial plan was to provide a way to get transmission certificate of need (CN) applications reviewed without the need for a contested case proceeding for every CN application. Prior to the Biennial Reports nearly all CN applications went through a contested case proceeding. In the time since the Biennial Report was first required the lessons learned from the CN process based on comments rather than contested cases have been applied more broadly to all relatively simple CN applications. In this way the Biennial Report has been a valuable tool in streamlining the CN application process.

However, the Department agrees that the requirements of the Biennial Report no longer fulfill their intended goals. The history of the Biennial Report has shown that neither public meetings nor webinars have been effective public outreach tools. The Department recommends that the MTO continue to maintain the Report's website and update it regularly, including information on how and when the public may comment on the report before the Commission.

The Department agrees with MTO's recommendation that the Commission approve the following for the 2015 Biennial Report:

- Continue the variance from the zonal public meetings in part 7848.0900 and not require that a webinar be scheduled either.
- Require the MTO to continue to maintain the minnelectrans webpage with information about transmission planning activities.

The MTO also propose to eliminate the requirement for a separate Biennial Report, and instead require the MISO member utilities to reference the latest MISO Transmission Expansion Planning (MTEP) Report only. Non-MISO member utilities would refer to the Midcontinent Area Power Pool (MAPP) Regional Plan. The Department supports efficiencies, but notes that it is also important to ensure that the public can find and understand the MTEP and MAPP reports in the same manner as the Biennial Report. Thus, the Department does not oppose the MTO's recommendation if the MTO can demonstrate that the information on specific Minnesota utilities' transmission inadequacies, including information on substation locations, line voltage, CN and construction timelines, can all be found and understood by the public in the MTEP Report. To ensure that the information is readily available and understandable, the Department recommends that MTO select a few inadequacies identified in the 2013 Biennial Report and show where this information is located in the MTEP report.

If the Commission decides to eliminate the requirement for a separate Biennial Report, the Department agrees with MTO's recommendation that the Commission require those utilities that are required to report on transmission upgrades to support compliance with renewable energy standards to still file an RES report including a gap analysis. In addition, if the MTEP report's contents change in the future to the point that the report no longer contains adequate, understandable and available information on Minnesota transmission inadequacies to fulfill the original purpose of the Biennial Transmission Plan, the Department recommends that the Commission require the MTO to file inadequacy information in addition to referencing the MTEP report.

The Department also recommends that the process with service lists for this docket be revised slightly. While it is important for the county and local governments in the state to receive the report filed by MTO and any other information that the Commission decides should be included, it is not necessary for these entities to receive all documents filed in the case. The Department received many calls from county and local governments around the state that were added to the service list years ago, yet were unfamiliar with the report and were unsure why they were being served with this information. For the time being, organizations and individuals who do not wish to receive e-service on this docket should email eservice.admin@state.mn.us.

IV. CONCLUSION

The Department recommends that the Commission approve the 2013 Biennial Transmission Report. In addition, the Department recommends that:

- MTO member utilities file information on mitigation measures in future Biennial Reports. This information should include:
 - a summary of all mitigation measures that have been added at any step in the permitting process, including a list of all voluntary measures;
 - the general reason for the mitigation measure, including whether the measure was requested or required;
 - the entity requesting or requiring the mitigation; and
 - the cost of the mitigation measure.

- the MTO file additional information in support of their proposal to eliminate the 2015 Biennial Report requirement by instead referencing the MTEP and MAPP reports. Specifically, the Department recommends that MTO demonstrate that the public can readily find and understand in the MTEP 2013 report the transmission inadequacy information that has been provided in the 2013 Biennial Report; and
- the service list for this docket be revised.

In addition, the Department puts the MTO on notice that the Department intends to request in future certificate of need petitions that utilities identify the amount of mitigation costs included in their proposals.

/lt

CERTIFICATE OF SERVICE

I, Sharon Ferguson, hereby certify that I have this day, served copies of the following document on the attached list of persons by electronic filing, certified mail, e-mail, or by depositing a true and correct copy thereof properly enveloped with postage paid in the United States Mail at St. Paul, Minnesota.

**Minnesota Department of Commerce
Reply Comments**

Docket No. E999/M-13-402

Dated this **20th** day of **March 2014**

/s/Sharon Ferguson

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WR	Hensel	whensel@benco.org	Blue Earth-Nicollet-Faribault Cooperative (BENCO)	Hwy 169 South PO Box 8 Mankato, MN 56001	Electronic Service	No	OFF_SL_13-402_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Richard J.	Hettwer	rj.hettwer@smmpa.org	SMMPA	500 First Avenue, SW Rochester, MN 559023303	Electronic Service	No	OFF_SL_13-402_Official
Scott	Higgins	scott.higgins@co.martin.mn.us	Martin County	Room 100 201 Lake Avenue Fairmont, MN 56031	Electronic Service	No	OFF_SL_13-402_Official
Cheryal Lee	Hills	chills@regionfive.org	Region Five Development Commission	200 First Street NE Suite 2 Staples, MN 56479	Electronic Service	No	OFF_SL_13-402_Official
Steve	Hirsch	steve.hirsch@state.mn.us	MN Department of Natural Resources	Room 25, DNR Building 500 Lafayette Rd St. Paul, MN 55155	Electronic Service	No	OFF_SL_13-402_Official
Joe	Hoffman	jhoffman@prestonmn.org	Preston Public Utilities	PO Box 657 Preston, MN 55965	Electronic Service	No	OFF_SL_13-402_Official
Mark	Hoffman	mhoffman@eastriver.coop	East River Electric Power Coop., Inc.	PO Box 227 211 S Harth Ave Madison, SD 57042	Electronic Service	No	OFF_SL_13-402_Official
Jeffrey	Holsen	cityhall@runestone.net	Elbow Lake Municipal Electric Dept.	PO Box 1079 Elbow Lake, MN 56531	Electronic Service	No	OFF_SL_13-402_Official
Wesley	Hompe	wmu@wmu.willmar.mn.us	Willmar Munic. Utilities Comm.	PO Box 937 700 Litchfield Ave SW Willmar, MN 56201	Electronic Service	No	OFF_SL_13-402_Official
Dan	Hoskins	danh@wiktel.com	North Star Electric	P.O. Box 719 Baudette, MN 56623	Electronic Service	No	OFF_SL_13-402_Official
Kris	Ingenthron	kingenthron@mcleodcoop.com	McLeod Cooperative Power Association	1231 Ford Avenue PO Box 70 Glencoe, MN 55336	Electronic Service	No	OFF_SL_13-402_Official

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Linda	Jensen	linda.s.jensen@ag.state.mn.us	Office of the Attorney General-DOC	1800 BRM Tower 445 Minnesota Street St. Paul, MN 551012134	Electronic Service	No	OFF_SL_13-402_Official
Eric	Jensen	ejensen@iwla.org	Izaak Walton League of America	Suite 202 1619 Dayton Avenue St. Paul, MN 55104	Electronic Service	No	OFF_SL_13-402_Official
Roger	Johanneck	rjohanneck@minnkota.com	Red Lake Electric Cooperative, Inc.	412 International drive PO Box 430 Red Lake Falls, MN 56750	Electronic Service	No	OFF_SL_13-402_Official
David	Johnson	djohnson@co.wabasha.mn.us	Wabasha County	625 Jefferson Avenue Wabasha, MN 55981	Electronic Service	No	OFF_SL_13-402_Official
Kit	Johnson	kit.johnson@co.traverse.mn.us	Traverse County	702 2nd Ave N PO Box 428 Wheaton, MN 56296	Electronic Service	No	OFF_SL_13-402_Official
Korwin	Johnson	kjohnson@agralite.com	Agralite Electric Cooperative	PO Box 228 320 East Highway 12 Benson, MN 56215	Electronic Service	No	OFF_SL_13-402_Official
Lisa	Joyal	lisa.joyal@state.mn.us	Department of Natural Resources	500 Lafayette Road, Box 25 St. Paul, MN 55155	Electronic Service	No	OFF_SL_13-402_Official
Dan	Juhl	dan@juhlwind.com	Juhl Energy Inc.	1502 17th St SE Pipestone, MN 56164	Electronic Service	No	OFF_SL_13-402_Official
Mike	Junge	michael.junge@co.mcleod.mn.us	Mcleod County	830 - 11TH St. East, Suite 112 Glencoe, MN 55336	Electronic Service	No	OFF_SL_13-402_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Dennis	Jutting	djutting@centurytel.net	Westbrook Municipal Light And Power	556 First Avenue PO Box 308 Westbrook, MN 561830308	Electronic Service	No	OFF_SL_13-402_Official
Lee	Kelly	Lee.Kelly@co.wright.mn.us	Wright County	10 2nd Street NW Buffalo, MN 55313	Electronic Service	No	OFF_SL_13-402_Official
Rick	Kelsven	rmkelsv@co.becker.mn.us	Becker County	915 Lake Ave Detroit Lakes, MN 56501	Electronic Service	No	OFF_SL_13-402_Official
Bob	Kindler	bob.kindler@co.freeborn.mn.us	Freeborn County	411 S Broadway Albert Lea, MN 56007	Electronic Service	No	OFF_SL_13-402_Official
Ray	Kirsch	Raymond.Kirsch@state.mn.us	Department of Commerce	85 7th Place E Ste 500 St. Paul, MN 55101	Electronic Service	No	OFF_SL_13-402_Official
Richard	Kittelton	rdkbppu@frontiernet.net	Blooming Prairie Public Utilities Commission	146 3rd Ave SE PO Box 55 Blooming Prairie, MN 55917	Electronic Service	No	OFF_SL_13-402_Official
Larry	Kleindl	larry_k@co.kandiyohi.mn.us	Kandiyohi County	Suite 2020 2200 23rd Street SW Willmar, MN 56201	Electronic Service	No	OFF_SL_13-402_Official
Angela	Knish	angiek@co.mower.mn.us	Mower County Environmental Services	1105 1/2 8th Avenue NE Austin, MN 55912	Electronic Service	No	OFF_SL_13-402_Official
Kate	Knuth	kate.knuth@gmail.com		2347 14th Terrace NW New Brighton, MN 55112	Electronic Service	No	OFF_SL_13-402_Official
Michelle	Knutson	michelle.knutson@co.big-stone.mn.us	Big Stone County	N/A	Electronic Service	No	OFF_SL_13-402_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Curt	Kobilarcsik	curt.kobilarcsik@co.anoka.mn.us	Anoka County	1440 Bunker Lake Blvd NW Andover, MN 55304-4005	Electronic Service	No	OFF_SL_13-402_Official
Adam	Koch	Adam.koch@ci.stjames.mn.us	St. James Light & Water Dept.	PO Box 70 St. James, MN 56081-0070	Electronic Service	No	OFF_SL_13-402_Official
Andrew	Koebrick	andrew.koebrick@state.mn.us	MN Department of Administration	658 Cedar 300 COB Saint Paul, MN 55155	Electronic Service	No	OFF_SL_13-402_Official
Larry J.	Koshire	lkoshire@rpu.org	Rochester Public Utilities	4000 East River Road NE Rochester, MN 559062813	Electronic Service	No	OFF_SL_13-402_Official
Stacy	Kotch	Stacy.Kotch@state.mn.us	MINNESOTA DEPARTMENT OF TRANSPORTATION	395 John Ireland Blvd. St. Paul, MN 55155	Electronic Service	No	OFF_SL_13-402_Official
Brian	Krambeer	bkrambeer@tec.coop	Tri-County Electric Cooperative	PO Box 626 31110 Cooperative Way Rushford, MN 55971	Electronic Service	No	OFF_SL_13-402_Official
Michael	Krikava	mkrikava@briggs.com	Briggs And Morgan, P.A.	2200 IDS Center 80 S 8th St Minneapolis, MN 55402	Electronic Service	No	OFF_SL_13-402_Official
Karen	Kromar	karen.kromar@state.mn.us	MN Pollution Control Agency	520 Lafayette Rd Saint Paul, MN 55155	Electronic Service	No	OFF_SL_13-402_Official
Jim	Krueger	jkrueger@fmcs.coop	Freeborn-Mower Cooperative Services	Box 611 Albert Lea, MN 56007	Electronic Service	No	OFF_SL_13-402_Official
Mike	Kumm	mkumm@ci.hutchinson.mn.us	Hutchinson Utilities Commission	225 Michigan St., SE Hutchinson, MN 55350	Electronic Service	No	OFF_SL_13-402_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Martin	LaVenture	martin.laventure@health.state.mn.us	MN Department of Health	P.O. Box 64882 St. Paul, MN 55164	Electronic Service	No	OFF_SL_13-402_Official
Mandy	Landkamer	mlandkamer@co.nicollet.mn.us	Nicollet County Environmental Services	501 South Minnesota Ave St. Peter, MN 56082	Electronic Service	No	OFF_SL_13-402_Official
John	Lee	jlee@barr.com	Barr Engineering Co.	4700 W. 77th Street Minneapolis, MN 55435	Electronic Service	No	OFF_SL_13-402_Official
Paul J.	Lehman	paul.lehman@xcelenergy.com	Xcel Energy	414 Nicollet Mall Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_13-402_Official
Michael	Lein	mlein@co.carver.mn.us	Carver County	600 East 4th St Chaska, MN 55318	Electronic Service	No	OFF_SL_13-402_Official
Aggie	Leitheiser	aggie.leitheiser@state.mn.us	Department of Health	85 East 7th Place St. Paul, MN 55101	Electronic Service	No	OFF_SL_13-402_Official
Reference	Librarian	paperonly@paper.only	Hennepin County Library	Minneapolis Central 300 Nicollet Mall Minneapolis, MN 55401	Paper Service	No	OFF_SL_13-402_Official
Elizabeth	Lincoln	elizabeth.lincoln@lrl.leg.mn	Minnesota Legislative Reference Library	643 State Office Building St. Paul, MN 55155	Electronic Service	No	OFF_SL_13-402_Official
John	Lindell	agorud.ecf@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012130	Electronic Service	Yes	OFF_SL_13-402_Official
Greg	Lippert	gregl@olivia.mn.us	Olivia Municipal Water & Light Dept	1009 West Lincoln Avenue Olivia, MN 56277	Electronic Service	No	OFF_SL_13-402_Official

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Michael	Loeffler	mike.loeffler@nngco.com	Northern Natural Gas Co.	CORP HQ, 714 1111 So. 103rd Street Omaha, NE 681241000	Electronic Service	No	OFF_SL_13-402_Official
Paula	Maccabee	Pmaccabee@justchangela w.com	Just Change Law Offices	1961 Selby Avenue St. Paul, MN 55104	Paper Service	No	OFF_SL_13-402_Official
Tim	Magnusson	tim.magnusson@co.clay.m n.us	Clay County	807 N 11 ST Moorhead, MN 56560	Electronic Service	No	OFF_SL_13-402_Official
Gerald	Mareck	gerrym@mvec.net	Minnesota Valley Electric Cooperative	PO Box 125 Jordan, MN 55352-0125	Electronic Service	No	OFF_SL_13-402_Official
Pam	Marshall	pam@energycents.org	Energy CENTS Coalition	823 7th St E St. Paul, MN 55106	Electronic Service	No	OFF_SL_13-402_Official
Tim	Mergen	tmergen@meeke.coop	Meeke Cooperative Light And Power	1725 US Hwy 12 E. Suite 100 PO Box 68 Litchfield, MN 55355	Electronic Service	No	OFF_SL_13-402_Official
Colleen	Meyer	colleen.m.meyer@usace.ar my.mil	U.S. Army Corps of Engineers	N/A	Electronic Service	No	OFF_SL_13-402_Official
Mike	Michaud	mike@juhlwind.com	Juhl Energy Inc.	N802 240th St. Maiden Rock, WI 54750	Electronic Service	No	OFF_SL_13-402_Official
Gregory C.	Miller	gmiller@dakotaelectric.com	Dakota Electric Association	4300 220th Street West Farmington, MN 55024	Electronic Service	No	OFF_SL_13-402_Official
Terrance	Miller	tmiller2@iw.net	Adrian Public Utilities	20 Maine Avenue Adrian, MN 56110	Electronic Service	No	OFF_SL_13-402_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Alan	Mitchell	amitchell@fredlaw.com	Fredrikson & Byron, P.A.	200 South Sixth Street Suite 4000 Minneapolis, MN 55402-1425	Electronic Service	No	OFF_SL_13-402_Official
Kevin	Mixon	kevin.mixon@state.mn.us	Department of Natural Resources	261 HWY 15 S New Ulm, MN 56073	Electronic Service	No	OFF_SL_13-402_Official
Keith	Modglin	keith.modglin@millelacsband.com	Mille Lacs Band of Ojibwe	43408 Oodena Dr Onamia, MN 56359-2236	Electronic Service	No	OFF_SL_13-402_Official
Kevin	Molloy	kevin.molloy@state.mn.us	Minnesota Pollution Control Agency	520 Lafayette Rd N St. Paul, MN 55155	Electronic Service	No	OFF_SL_13-402_Official
Michael	Monsrud	mmonsrud@itasca-mantrap.com	Itasca-Mantrap Coop. Electric Assn.	PO Box 192 Park Rapids, MN 56470	Electronic Service	No	OFF_SL_13-402_Official
Andrew	Moratzka	apmoratzka@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_13-402_Official
Debra	Moynihan	debra.moynihan@state.mn.us	MN Department of Transportation	395 John Ireland Blvd MS 620 St. Paul, MN 55155-1899	Electronic Service	No	OFF_SL_13-402_Official
Ralph D.	Mykkanen	ralphm@mlecmn.com	Mille Lacs Electric Cooperative	P.O. Box 230 Aitkin, MN 56431	Electronic Service	No	OFF_SL_13-402_Official
Brian	Napstad	bnapstad@yahoo.com	Board of Water and Soil Resources	51227 Long Point Place McGregor, MN 55780	Paper Service	No	OFF_SL_13-402_Official
Dale	Narlock	dnarlock@citytrf.net	City of Thief River Falls	Power & Light Dept. Box 528 Thief River Falls, MN 56701	Electronic Service	No	OFF_SL_13-402_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
John	Nauerth	proplock@federatedwildblu e.com		42549 800th St Lakefield, MN 56150	Electronic Service	No	OFF_SL_13-402_Official
Joanne	Nelson	Joanne.Nelson@Co.Kanab ec.mn.us	Kanabec County Sheriff's Office	100 South Vine St Mora, MN 55051	Electronic Service	No	OFF_SL_13-402_Official
Troy	Nemmers PE	tnemmers@fairmont.org	City of Fairmont	100 Downtown Plz. PO Box 751 Fairmont, MN 56031-0751	Electronic Service	No	OFF_SL_13-402_Official
DeeAnne	Newville	dnewville@renville- sibley.coop	Renville-Sibley Cooperative Power Assn	103 Oak Street Box 68 Danube, MN 56230	Electronic Service	No	OFF_SL_13-402_Official
Mark	Nibaur	markn@austinutilities.com	Austin Utilities	400 Fourth Street NE Austin, MN 55912	Electronic Service	No	OFF_SL_13-402_Official
Scott	Nickels	snickels@rpu.org	Rochester Public Utilities	4000 East River Road Northeast Rochester, MN 55906	Electronic Service	No	OFF_SL_13-402_Official
Michael	Noble	noble@fresh-energy.org	Fresh Energy	Hamm Bldg., Suite 220 408 St. Peter Street St. Paul, MN 55102	Electronic Service	No	OFF_SL_13-402_Official
Information	Officer	bwilliams@co.nobles.mn.u s	Nobles County Government Center	P.O. Box 757 Worthington, MN 56187	Electronic Service	No	OFF_SL_13-402_Official
Information	Officer	lisa.a.kramer@co.dodge.m n.us	Dodge County Courthouse	22 6TH ST E, DEPT 45 Mantorville, MN 559552215	Electronic Service	No	OFF_SL_13-402_Official
Information	Officer	jack.schmalenberg@co.pol k.mn.us	Polk County Courthouse	612 North Broadway Crookston, MN 56716	Electronic Service	No	OFF_SL_13-402_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Information	Officer	carol.lapham@co.houston.mn.us	Houston County Courthouse	304 South Marshall Caledonia, MN 55921	Electronic Service	No	OFF_SL_13-402_Official
Information	Officer	echristiansen@co.kittson.mn.us	Kittson County Courthouse	Suite 214 410 5th Street South Hallock, MN 56728	Electronic Service	No	OFF_SL_13-402_Official
Rick	Olesen	rolesen@ilec.coop	Iowa Lakes Electric Cooperative	702 South 1st Street Estherville, IA 51334-1890	Electronic Service	No	OFF_SL_13-402_Official
Robert	Olsen	rolsen@co.lincoln.mn.us	Lincoln County Environmental Office	319 N. Rebecca PO Box 29 Ivanhoe, MN 56142	Electronic Service	No	OFF_SL_13-402_Official
Carol A.	Overland	overland@legalectric.org	Legalelectric - Overland Law Office	1110 West Avenue Red Wing, MN 55066	Electronic Service	No	OFF_SL_13-402_Official
Bob	Patton	bob.patton@state.mn.us	MN Department of Agriculture	625 Robert St N Saint Paul, MN 55155-2538	Electronic Service	No	OFF_SL_13-402_Official
Gerald J.	Peterschick	randallcity@brainerd.net	Randall Electric Light Company	PO Box 229 525 Pacific Avenue Randall, MN 56475	Electronic Service	No	OFF_SL_13-402_Official
Gordon	Pietsch	gpietsch@greenergy.com	Great River Energy	12300 Elm Creek Blvd. Maple Grove, MN 55369-4718	Electronic Service	No	OFF_SL_13-402_Official
Steve	Porter	scp@dairynet.com	Dairyland Power Cooperative	3200 East Avenue South P.O. Box 817 LaCrosse, WI 54602-0817	Electronic Service	No	OFF_SL_13-402_Official
Jason	Purrington	jason.purrington@co.cottonwood.mn.us	Cottonwood County Sheriff Office	902 5th Ave Windom, MN 56101	Electronic Service	No	OFF_SL_13-402_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
BRANDT	RICHARDSON	brandt.richardson@co.dakota.mn.us	DAKOTA COUNTY	1590 HWY 55 ADMINISTRATION CENTER Hastings, MN 55033	Electronic Service	No	OFF_SL_13-402_Official
Kent	Ragsdale	kentagsdale@alliantenergy.com	Alliant Energy-Interstate Power and Light Company	P.O. Box 351 200 First Street, SE Cedar Rapids, IA 524060351	Electronic Service	No	OFF_SL_13-402_Official
Bruce	Reimers	breimers@ci.new-prague.mn.us	New Prague Utilities Commission	118 Central Avenue North New Prague, MN 56071	Electronic Service	No	OFF_SL_13-402_Official
Margaret	Rheude	Margaret_Rheude@fws.gov	U.S. Fish and Wildlife Service	Twin Cities Ecological Services Field Office 4101 American Blvd. E. Bloomington, MN 55425	Electronic Service	No	OFF_SL_13-402_Official
Nancy	Riddle	zoning@co.sherburne.mn.us	Sherburne County Planning/Zoning	13880 Highway 10 Elk River, MN 55330-4601	Electronic Service	No	OFF_SL_13-402_Official
Michael	Riewer	MRiewer@otpc.com	Otter Tail Power Company	PO Box 4496 Fergus Falls, MN 56538-0496	Electronic Service	No	OFF_SL_13-402_Official
Cathy	Roos	croos@co.nobles.mn.us	Nobles County Administration	315 Tenth Street PO Box 757 Worthington, MN 56187-0757	Electronic Service	No	OFF_SL_13-402_Official
Brad	Roos	bradr@marshallutilities.com	Marshall Municipal Utilities	113 4th Street South Marshall, MN 56258	Electronic Service	No	OFF_SL_13-402_Official
Michele	Ross	michele.ross@state.mn.us	Department of Health	625 N Robert St Saint Paul, MN 55101	Electronic Service	No	OFF_SL_13-402_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Steve	Schneider	steve.schneider@ci.stpaul.mn.us	Board of Water Commissioners	1900 Rice Street St. Paul, MN 55113	Electronic Service	No	OFF_SL_13-402_Official
Kurt	Schneider	kmschne@co.chisago.mn.us	Chisago County Environmental Svcs Zoning	313 N. Main Street #243 Center City, MN 55012	Electronic Service	No	OFF_SL_13-402_Official
Jamie	Schrenzel	jamie.schrenzel@state.mn.us	Minnesota Department of Natural Resources	500 Lafayette Road Saint Paul, MN 55155	Electronic Service	No	OFF_SL_13-402_Official
Matthew J.	Schuerger P.E.	mjsreg@earthlink.net	Energy Systems Consulting Services, LLC	PO Box 16129 St. Paul, MN 55116	Electronic Service	No	OFF_SL_13-402_Official
William E.	Schwandt	mpps@mpsutility.com	Moorhead Public Service	500 Cedar Avenue PO Box 779 Moorhead, MN 565610779	Electronic Service	No	OFF_SL_13-402_Official
Official	Service	j.dhein@cityofmora.com	Mora Public Utilities Commission	101 Lake Street S. Mora, MN 55051-1588	Electronic Service	No	OFF_SL_13-402_Official
William	Seuffert	Will.Seuffert@state.mn.us		75 Rev Martin Luther King Jr Blvd 130 State Capitol St. Paul, MN 55155	Electronic Service	No	OFF_SL_13-402_Official

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Steve	Shurts	steve.shurts@ecemn.com	East Central Energy	412 North Main Braham, MN 55006	Electronic Service	No	OFF_SL_13-402_Official
Sidney	Sletten	ssletten@beltramelectric.com	Beltrami Electric Cooperative	po box 488 Bemidji, Mn 56619	Electronic Service	No	OFF_SL_13-402_Official
Theresa	Slominski	tslominski@elkriverutilities.com	Elk River Municipal Utilities	PO Box 430 Elk River, MN 55330-0430	Electronic Service	No	OFF_SL_13-402_Official
Ted	Smith	ted.smith@siouxvalleyenergy.com	Sioux Valley - Southwestern Elec Coop, Inc.	P O Box 216 Colman, SD 570170216	Electronic Service	No	OFF_SL_13-402_Official
Beth H.	Soholt	bsoholt@windonthewires.org	Wind on the Wires	570 Asbury Street Suite 201 St. Paul, MN 55104	Electronic Service	No	OFF_SL_13-402_Official
Wayne	Sorensen	wayne.sorensen@co.freeborn.mn.us	Freeborn County	411 S. Broadway PO Box 1147 Albert Lea, MN 56007-1147	Electronic Service	No	OFF_SL_13-402_Official
Randy	Spicer	rspicer@roseauelectric.coop	Roseau Electric Coop., Inc.	po box 100 Roseau, mn 56751	Electronic Service	No	OFF_SL_13-402_Official
Joseph	Steffel	joseph.steffel@ci.buffalo.mn.us	City of Buffalo Municipal Electric	212 Central Avenue Buffalo, MN 55313	Electronic Service	No	OFF_SL_13-402_Official
Suzanne	Steinhauer	suzanne.steinhauer@state.mn.us	Department of Commerce	85 7th Place East Suite 500 St. Paul, MN 55101	Electronic Service	No	OFF_SL_13-402_Official

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Marty	Sunderman	martys@scpuc.com	Sauk Centre Public Utilities Commission.	101 Main Street South P.O. Box 128 Sauk Centre, MN 56378	Electronic Service	No	OFF_SL_13-402_Official
Eric	Swanson	eswanson@winthrop.com	Winthrop Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_13-402_Official
Mike	Taylor	mtaylor@boreal.org	Grand Marais Public Utilities Comm.	15 Broadway North PO Box 600 Grand Marais, MN 55604	Electronic Service	No	OFF_SL_13-402_Official
SaGonna	Thompson	Regulatory.Records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_13-402_Official
Debbie	Thompson	dthompson@co.hubbard.mn.us	Hubbard County	301 Court Avenue Park Rapids, MN 56470	Electronic Service	No	OFF_SL_13-402_Official
James	Thoreen	jimthoreen@co.stevens.mn.us	Stevens County Courthouse	PO Box 530 Morris, MN 56267	Electronic Service	No	OFF_SL_13-402_Official
David	Todd	lanesboro@acegroup.cc	Lanesboro Public Utilities Commission	PO Box 333 Lanesboro, MN 55949	Electronic Service	No	OFF_SL_13-402_Official
Russ	Wagner	russell.wagner@centerpointenergy.com	CenterPoint Energy	800 LaSalle Avenue PO Box 59038 Minneapolis, MN 554590038	Electronic Service	No	OFF_SL_13-402_Official
Connie	Wangen	cwangen@sherbtel.net	Princeton Public Utilities Commission	907 1st Street Princeton, MN 55371	Electronic Service	No	OFF_SL_13-402_Official

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Bruce	West	Bruce.West@state.mn.us	Department of Public Safety	Box 145 444 Cedar Street St. Paul, MN 55151	Electronic Service	No	OFF_SL_13-402_Official
Christian	Winter	cwinter@mnpower.com	Minnesota Power	30 W Superior St Duluth, MN 55802	Electronic Service	No	OFF_SL_13-402_Official
Scott	Woitas	scott.woitas@co.freeborn.mn.us	Freeborn County Courthouse	411 South Broadway Albert Lea, MN 56007	Electronic Service	No	OFF_SL_13-402_Official
Jonathan	Wolfgram	Jonathan.Wolfgram@state.mn.us	Department of Public Safety	445 Minnesota Street Suite 147 St. Paul, MN 55101-1547	Electronic Service	No	OFF_SL_13-402_Official
Brian	Zavesky	brianz@mrenergy.com	Missouri River Energy Services	3724 West Avera Drive P.O. Box 88920 Sioux Falls, SD 57108-8920	Electronic Service	No	OFF_SL_13-402_Official