



June 16, 2026

Sasha Bergman, *Executive Secretary*
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101

RE: IN THE MATTER OF THE APPLICATION FOR A CERTIFICATE OF NEED FOR THE POWERON MIDWEST
765 kV AND 345 kV HIGH VOLTAGE TRANSMISSION LINE PROJECT
DOCKET No. E002, ET2, ET6675/CN-25-117
CAH Docket No 28-2500-41617

Dear Ms. Bergman:

Great River Energy, Northern States Power Company, doing business as Xcel Energy, and ITC Midwest LLC (collectively, Applicants) respectfully submit the enclosed Applicants' Request for Clarification and/or Objection to June 9, 2026 Order and Scoping Decision, to the Minnesota Public Utilities Commission regarding the above-captioned docket.

This document has been e-filed today through www.edockets.state.mn.us. A copy of this filing is also being served upon the persons on the attached Service List. If you have any questions or need additional information, please contact Dan Leshner at dlesher@greenergy.com, Jody Londo at jody.l.londo@xcelenergy.com, or Margaret Kristian at mkristian@itctransco.com.

Sincerely,

/s/ Dan Leshner

Dan Leshner
Manager, Transmission Permitting & Land Rights
Great River Energy





/s/ Jody L. Londo

Jody L. Londo
Regional Vice President, Regulatory Planning and Policy
Northern States Power Company

/s/ Margaret Kristian

Margaret Kristian
Manager-Regulatory Strategy
ITC Midwest LLC



**STATE OF MINNESOTA
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In the Matter of the Application for a Certificate of Need for the PowerOn Midwest 765 kV and 345 kV High Voltage Transmission Line Project

Docket No. E002, ET2, ET6675/CN-25-117
CAH Docket No. 28-2500-41617

**APPLICANTS' REQUEST FOR
CLARIFICATION AND/OR OBJECTION
TO JUNE 9, 2026, ORDER AND SCOPING
DECISION**

Great River Energy, Northern States Power Company, doing business as Xcel Energy, and ITC Midwest LLC (collectively, Applicants) submit this Request for Clarification and/or Objection to the Minnesota Public Utilities Commission's (Commission) June 9, 2026 Order and the related Environmental Report Scoping Decision (Scoping Decision) for the proposed PowerOn Midwest Project (Project). The issue raised in this Request/Objection is narrow and relates to one system alternative identified in the Scoping Decision. As such, the Applicants anticipate that this Request/Objection can be resolved without delays to the dates identified in the First Prehearing Order.

The Scoping Decision states that the Environmental Report will evaluate transmission alternatives including "partial-build or delayed-build alternatives for the Pleasant Valley-to-North Rochester 765-kV segment."¹ Elsewhere, the Scoping Decision states that "[a]lternatives with different endpoints than those identified for the proposed project, except where such endpoints are

¹ Order Approving the Proposed Environmental Report Scoping Decision, p. 7 (June 9, 2026) (eDocket No. [20266-232674-01](#)) (hereafter cited as "Scoping Decision").

consistent with Minn. Stat. § 216B.243, subd. 3(6)” will not be studied in the Environmental Report.²

The Applicants request clarification regarding the intended evaluation of the partial/delayed build alternative because such evaluation is inconsistent with Minn. Stat. § 216B.243, subd. 3(6), which limits the Commission’s evaluation of alternative endpoints to only two circumstances, neither of which is present here:

the commission must not require evaluation of alternative end points for a high-voltage transmission line qualifying as a large energy facility unless the alternative end points are (i) consistent with end points identified in a federally registered planning authority transmission plan, or (ii) otherwise agreed to for further evaluation by the applicant.

First, as the Applicants explained in their May 29, 2026 Response to Scoping Comments, the partial/delayed build for Pleasant Valley to North Rochester would result in a change in endpoints to LRTP 24, as approved by the Midcontinent Independent System Operator, Inc. (MISO).³ Specifically, LRTP 24 is a 765 kV line with endpoints at the Lakefield, Pleasant Valley, and North Rochester substations.⁴ The partial/delayed build alternative would change the endpoints for LRTP 24 because it would remove LRTP 24’s endpoint at the North Rochester Substation.

Second, the Applicants do not agree to further evaluation of these alternatives in the docket. For ease of reference, the Applicants summarize portions of their prior comments in the paragraphs below.

² Scoping Decision, p. 10.

³ Applicants’ Response to Scoping Comments, pp. 14-15, 18-20 (May 29, 2026) (eDocket No. [20265-232324-01](#)).

⁴ Joint Application to the Minnesota Public Utilities Commission for a Certificate of Need, p. 110 (Feb. 3, 2026) (eDocket No. [20262-227787-02](#)) (hereafter cited as “Application”).

Each Project component is needed and necessary because the LRTP Tranche 2.1 projects work together to address system needs. LRTP 24, with endpoints at Lakefield, Pleasant Valley, and North Rochester, is the primary “artery” for the Studied Projects⁵ – connecting Minnesota’s high voltage hubs to both generation sources and load sinks as described in the Application.⁶ The North Rochester 765 kV termination is thus intentional and essential. The North Rochester Substation has been a key component in each of MISO’s regional transmission plans going back to 2011. To date, there have been three regional portfolios that included projects connecting to the North Rochester Substation.⁷ The North Rochester Substation is a hub connecting Rochester, the Twin Cities, Mankato, and western Wisconsin and is an “on and off ramp” for power to flow to and from destinations to and well beyond Rochester on the high voltage and lower voltage systems.

The Applicants do not consent to further evaluation, given the exhaustive analysis MISO undertook and the role of the Project as part of a regional portfolio of projects designed and optimized to work together as Multi-Value Projects (MVPs) eligible for regional cost sharing under the MISO Open Access Transmission, Energy and Operating Reserve Markets Tariff. Given the critical nature of the North Rochester Substation hub, MISO designed the portfolio to have two transmission lines connecting at North Rochester, so that if one of the 765 kV lines is out of service, the substation could still be served by the other.⁸ A change in endpoint that eliminates North Rochester not only has implications to the Project, but would impact the broader MISO LRTP

⁵ The Studied Projects include the entirety of MISO designated LRTPs 22 through 26 from South Dakota to Wisconsin.

⁶ *See, e.g.*, Application, p. 110.

⁷ In Tranche 1, MISO approved the Mankato-Mississippi River Transmission Project. In the first MVP portfolio, MISO approved the Twin Cities-Rochester-La Crosse 345 kV Project.

⁸ MISO Comments, p. 4 (May 20, 2026) (eDocket No. [20265-232019-01](#)).

Tranche 2.1 portfolio. In addition, the delayed/partial build alternatives would be a new project and not eligible for cost sharing unless it also qualified as an MVP.⁹

In summary, a delayed/partial build for Pleasant Valley to North Rochester would change the end point of LRTP 24, as studied and approved by MISO. Applicants do not agree to the Environmental Report evaluating alternative endpoints to LRTP 24. Thus, Minn. Stat. § 216B.243, subd. 3(6) precludes consideration of the proposed alternative. The Scoping Decision states that end points that are inconsistent with the statute will not be studied, and the Applicants request that the Scoping Decision be clarified to avoid potential later public confusion.¹⁰ To the extent the Commission intends to study the delayed/partial build of LRTP 24, contrary to Minn. Stat. § 216B.243, subd. 3(6), the Applicants object to the June 9, 2026 Order.

Dated: June 16, 2026

/s/ Lisa M. Agrimonti

Lisa M. Agrimonti (#0272474)
Haley L. Waller Pitts (#0393470)
FREDRIKSON & BYRON, P.A.
60 South Sixth Street
Suite 1500
Minneapolis, MN 55402-4400
(612) 492-7000

lagrimonti@fredlaw.com
hwallerpitts@fredlaw.com

**Attorneys for Great River Energy &
Northern States Power Company**

/s/ Valerie T. Herring

Valerie T. Herring (#0336865)
Kodi J. Verhalen (#0391056)
Taft Stettinius & Hollister LLP
2200 IDS Center
80 S. Eighth Street
Minneapolis, MN 55402
Telephone:(612) 977-8400

vherring@taftlaw.com
kverhalen@taftlaw.com

Attorneys for ITC Midwest LLC

⁹ MISO Comments, p. 3 (May 20, 2026) (eDocket No. [20265-232019-01](#)).

¹⁰ Scoping Decision, p. 10.

**IN THE MATTER OF THE APPLICATION FOR A
CERTIFICATE OF NEED FOR THE POWERON
MIDWEST 765 kV AND 345 kV HIGH VOLTAGE
TRANSMISSION LINE PROJECT**

**DOCKET NO. E002, ET2, ET6675/CN-25-117
CAH DOCKET No 28-2500-41617**

CERTIFICATE OF SERVICE

Breann L. Jurek certifies that on the 16th of June, 2026, she e-filed a true and correct copy of the **Applicants' Request for Clarification and/or Objection to June 9, 2026 Order and Scoping Decision**, on behalf of Great River Energy, Northern States Power Company, doing business as Xcel Energy, and ITC Midwest LLC via eDockets (www.edockets.state.mn.us).

Said document was also served as designated on the Official Service List on file with the Minnesota Public Utilities Commission and as attached hereto.

Executed on June 16, 2026

Signed: /s/ Breann L. Jurek

Fredrikson & Byron, P.A.
60 South Sixth Street
Suite 1500
Minneapolis, MN 55402

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
1	Lisa	Agrimonti	lagrimonti@fredlaw.com	Fredrikson & Byron, P.A.		60 South Sixth Street Suite 1500 Minneapolis MN, 55402-4400 United States	Electronic Service		No	25-117 Official CC Service List
2	Michael	Ahern	ahern.michael@dorsey.com	Dorsey & Whitney, LLP		50 S 6th St Ste 1500 Minneapolis MN, 55402-1498 United States	Electronic Service		No	25-117 Official CC Service List
3	Kristine	Anderson	kanderson@greatermngas.com	Greater Minnesota Gas, Inc.		1900 Cardinal Lane PO Box 798 Faribault MN, 55021 United States	Electronic Service		No	25-117 Official CC Service List
4	Katherine	Arnold	katherine.arnold@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		No	25-117 Official CC Service List
5	Sasha	Bergman	sasha.bergman@state.mn.us		Public Utilities Commission	121 7th PI E Ste 350 St. Paul MN, 55101 United States	Electronic Service		Yes	25-117 Official CC Service List
6	Matthew	Brodin	mbrodin@allete.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	25-117 Official CC Service List
7	Mike	Bull	mike.bull@state.mn.us		Public Utilities Commission	121 7th Place East, Suite 350 St. Paul MN, 55101 United States	Electronic Service		Yes	25-117 Official CC Service List
8	James	Canaday	james.canaday@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	Suite 1400 445 Minnesota St. St. Paul MN, 55101 United States	Electronic Service		No	25-117 Official CC Service List
9	Cody	Chilson	cchilson@greatermngas.com	Greater Minnesota Gas, Inc. & Greater MN Transmission, LLC		1900 Cardinal Ln PO Box 798 Faribault MN, 55021 United States	Electronic Service		No	25-117 Official CC Service List
10	Ray	Choquette	rchoquette@agp.com	Ag Processing Inc.		12700 West Dodge Road PO Box 2047 Omaha NE, 68103-2047 United States	Electronic Service		No	25-117 Official CC Service List
11	John	Coffman	john@johncoffman.net	AARP		871 Tuxedo Blvd. St. Louis MO, 63119-2044 United States	Electronic Service		No	25-117 Official CC Service List
12	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	25-117 Official CC Service List

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
13	Riley	Conlin	riley.conlin@xcelenergy.com	Northern States Power Company dba Xcel Energy-Elec		414 Nicollet Mall, 401 8th Floor Minneapolis MN, 55401 United States	Electronic Service		No	25-117 Official CC Service List
14	Brandon	Crawford	brandonc@cubminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota St Ste W1360 St. Paul MN, 55101 United States	Electronic Service		No	25-117 Official CC Service List
15	Hillary	Creurer	hcreurer@allete.com	Minnesota Power		30 W Superior St Duluth MN, 55802 United States	Electronic Service		No	25-117 Official CC Service List
16	George	Crocker	gwillc@nawo.org	North American Water Office		5093 Keats Avenue Lake Elmo MN, 55042 United States	Electronic Service		No	25-117 Official CC Service List
17	Lisa	Crum	lisa.crum@crumenergylaw.com	Crum Energy Law		302 East Howard Street, Suite 122 Hibbing MN, 55746 United States	Electronic Service		No	25-117 Official CC Service List
18	Ian M.	Dobson	ian.m.dobson@xcelenergy.com	Xcel Energy		414 Nicollet Mall, 401-8 Minneapolis MN, 55401 United States	Electronic Service		No	25-117 Official CC Service List
19	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	25-117 Official CC Service List
20	Eric	Fehlhaber	efehlhaber@dakotaelectric.com	Dakota Electric Association		4300 220th St W Farmington MN, 55024 United States	Electronic Service		No	25-117 Official CC Service List
21	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	25-117 Official CC Service List
22	Ryan	Fisher	rfisher@itctransco.com	ITC Midwest LLC		3165 Edgewood Parkway SW Cedar Rapids IA, 52404 United States	Electronic Service		No	25-117 Official CC Service List
23	Daryll	Fuentes	energy@usg.com	USG Corporation		550 W Adams St Chicago IL, 60661 United States	Electronic Service		No	25-117 Official CC Service List
24	Todd J.	Guerrero	todd.guerrero@kutakrock.com	Kutak Rock LLP		Suite 1750 220 South Sixth Street Minneapolis MN, 55402-1425 United States	Electronic Service		No	25-117 Official CC Service List
25	Adam	Heinen	aheinen@dakotaelectric.com	Dakota Electric Association		4300 220th St W Farmington	Electronic Service		No	25-117 Official CC

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						MN, 55024 United States				Service List
26	Abigail	Hencheck	ahencheck@mncenter.org	Minnesota Center for Environmental Advocacy		1919 University Ave W Suite 515 St. Paul MN, 55104 United States	Electronic Service		No	25-117 Official CC Service List
27	Annete	Henkel	mui@mnuutilityinvestors.org	Minnesota Utility Investors		413 Wacouta Street #230 St. Paul MN, 55101 United States	Electronic Service		No	25-117 Official CC Service List
28	Valerie	Herring	vherring@taftlaw.com	Taft Stettinius & Hollister LLP		2200 IDS Center 80 S. Eighth Street Minneapolis MN, 55402 United States	Electronic Service		No	25-117 Official CC Service List
29	Corey	Hintz	chintz@dakotaelectric.com	Dakota Electric Association		4300 220th Street Farmington MN, 55024-9583 United States	Electronic Service		No	25-117 Official CC Service List
30	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	25-117 Official CC Service List
31	Frank	Hornstein	frank.hornstein@minneapolismn.gov	City of Minneapolis		350 South 5th Street Minneapolis MN, 55415 United States	Electronic Service		No	25-117 Official CC Service List
32	Lori	Hoyum	lhoyum@mnpower.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	25-117 Official CC Service List
33	Amrit	Hundal	amrit.hundal@ag.state.mn.us		Office of the Attorney General - Department of Commerce		Electronic Service		No	25-117 Official CC Service List
34	Travis	Jacobson	travis.jacobson@mdu.com	Great Plains Natural Gas Company		400 N 4th St Bismarck ND, 58501 United States	Electronic Service		No	25-117 Official CC Service List
35	Alan	Jenkins	aj@jenkinsatlaw.com	Jenkins at Law		2950 Yellowtail Ave. Marathon FL, 33050 United States	Electronic Service		No	25-117 Official CC Service List
36	Richard	Johnson	rickjohnson@cozen.com	Cozen O'Connor		150 S. 5th Street Suite 1200 Minneapolis MN, 55402 United States	Electronic Service		No	25-117 Official CC Service List
37	Sarah	Johnson Phillips	sjphillips@stoel.com	Stoel Rives LLP		33 South Sixth Street Suite 4200 Minneapolis MN, 55402 United States	Electronic Service		No	25-117 Official CC Service List

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
38	Breann	Jurek	bjurek@fredlaw.com	Fredrikson & Byron PA		60 S Sixth St Ste 1500 Minneapolis MN, 55402 United States	Electronic Service		No	25-117 Official CC Service List
39	Nick	Kaneski	nick.kaneski@enbridge.com	Enbridge Energy Company, Inc.		11 East Superior St Ste 125 Duluth MN, 55802 United States	Electronic Service		No	25-117 Official CC Service List
40	Michael	Krikava	mkrikava@taftlaw.com	Taft Stettinius & Hollister LLP		2200 IDS Center 80 S 8th St Minneapolis MN, 55402 United States	Electronic Service		No	25-117 Official CC Service List
41	Nicolle	Kupser	nkupser@greatermngas.com	Greater Minnesota Gas, Inc.		1900 Cardinal Ln PO Box 798 Faribault MN, 55021 United States	Electronic Service		No	25-117 Official CC Service List
42	James D.	Larson	james.larson@avantenergy.com	Avant Energy Services		220 S 6th St Ste 1300 Minneapolis MN, 55402 United States	Electronic Service		No	25-117 Official CC Service List
43	Dan	Leshner	dlesher@greenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	25-117 Official CC Service List
44	Eric	Lipman	eric.lipman@state.mn.us		Office of Administrative Hearings	PO Box 64620 St. Paul MN, 55164-0620 United States	Electronic Service		No	25-117 Official CC Service List
45	Jody	Londo	jody.l.londo@xcelenergy.com	Xcel Energy		414 Nicollet Mall 7th Floor Minneapolis MN, 55401-1993 United States	Electronic Service		No	25-117 Official CC Service List
46	Susan	Ludwig	sludwig@mnpower.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	25-117 Official CC Service List
47	Kavita	Maini	kmains@wi.rr.com	KM Energy Consulting, LLC		961 N Lost Woods Rd Oconomowoc WI, 53066 United States	Electronic Service		No	25-117 Official CC Service List
48	Christine	Marquis	regulatory.records@xcelenergy.com	Xcel Energy		414 Nicollet Mall MN1180-07-MCA Minneapolis MN, 55401 United States	Electronic Service		No	25-117 Official CC Service List
49	Joseph	Meyer	joseph.c.meyer@state.mn.us		Office of Administrative Hearings	PO Box 64620 St. Paul MN, 55164 United States	Electronic Service		Yes	25-117 Official CC Service List
50	Max	Meyer	mmeyer@misoenergy.org	Midcontinent Independent System Operator, Inc.		2985 Ames Crossing Road Eagan MN, 55121 United States	Electronic Service		No	25-117 Official CC Service List

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
51	Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP		33 South Sixth St Ste 4200 Minneapolis MN, 55402 United States	Electronic Service		No	25-117 Official CC Service List
52	Will	Mulhern	mulhern@fresh-energy.org	Fresh Energy			Electronic Service		No	25-117 Official CC Service List
53	David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency		220 South Sixth Street Suite 1300 Minneapolis MN, 55402 United States	Electronic Service		No	25-117 Official CC Service List
54	Samantha	Norris	samanthanorris@alliantenergy.com	Interstate Power and Light Company		200 1st Street SE PO Box 351 Cedar Rapids IA, 52406-0351 United States	Electronic Service		No	25-117 Official CC Service List
55	Matthew	Olsen	molsen@otpc.com	Otter Tail Power Company		215 South Cascade Street Fergus Falls MN, 56537 United States	Electronic Service		No	25-117 Official CC Service List
56	Carol A.	Overland	overland@legalelectric.org	Legalelectric - Overland Law Office		1110 West Avenue Red Wing MN, 55066 United States	Electronic Service		No	25-117 Official CC Service List
57	Greg	Palmer	gpalmer@greatermngas.com	Greater Minnesota Gas, Inc.		1900 Cardinal Ln PO Box 798 Faribault MN, 55021 United States	Electronic Service		No	25-117 Official CC Service List
58	Jennifer	Peterson	jjpeterson@mnpower.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	25-117 Official CC Service List
59	Catherine	Phillips	catherine.phillips@wecenergygroup.com	Minnesota Energy Resources		231 West Michigan St Milwaukee WI, 53203 United States	Electronic Service		No	25-117 Official CC Service List
60	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	25-117 Official CC Service List
61	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	25-117 Official CC Service List
62	Jennifer	Rhuppiah	jrhuppiah@itctransco.com	ITC Midwest LLC		Suite 230 Des Moines IA, 50309 United States	Electronic Service		No	25-117 Official CC Service List
63	Susan	Romans	sromans@allete.com	Minnesota Power		30 West Superior Street Legal Dept	Electronic Service		No	25-117 Official CC

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						Duulth MN, 55802 United States				Service List
64	Elizabeth	Schmiesing	eschmiesing@winthrop.com	Winthrop & Weinstine, P.A.		225 South Sixth Street Suite 3500 Minneapolis MN, 55402 United States	Electronic Service		No	25-117 Official CC Service List
65	Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates		7400 Lyndale Ave S Ste 190 Richfield MN, 55423 United States	Electronic Service		Yes	25-117 Official CC Service List
66	Bria	Shea	bria.e.shea@xcelenergy.com	Xcel Energy		414 Nicollet Mall Minneapolis MN, 55401 United States	Electronic Service		No	25-117 Official CC Service List
67	Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.		76 W Kellogg Blvd St. Paul MN, 55102 United States	Electronic Service		No	25-117 Official CC Service List
68	Peggy	Sorum	peggy.sorum@centerpointenergy.com	CenterPoint Energy		505 Nicollet Mall Minneapolis MN, 55402 United States	Electronic Service		No	25-117 Official CC Service List
69	Byron E.	Starns	byron.starns@stinson.com	STINSON LLP		50 S 6th St Ste 2600 Minneapolis MN, 55402 United States	Electronic Service		No	25-117 Official CC Service List
70	Kristin	Stastny	kstastny@taftlaw.com	Taft Stettinius & Hollister LLP		2200 IDS Center 80 South 8th Street Minneapolis MN, 55402 United States	Electronic Service		No	25-117 Official CC Service List
71	Cary	Stephenson	cstephenson@otpc.com	Otter Tail Power Company		215 South Cascade Street Fergus Falls MN, 56537 United States	Electronic Service		No	25-117 Official CC Service List
72	Dusky	Terry	dterry@itctransco.com	ITC Midwest LLC			Electronic Service		No	25-117 Official CC Service List
73	Kodi	Verhalen	kverhalen@taftlaw.com	Taft Stettinius & Hollister LLP		80 S 8th St Ste 2200 Minneapolis MN, 55402 United States	Electronic Service		No	25-117 Official CC Service List
74	Leonard	Wabasha	leonard.wabasha@shakopeedakota.org	Shakopee Mdewakanton Sioux Community		2300 Tiwaha Circle Shakopee MN, 55379 United States	Electronic Service		No	25-117 Official CC Service List
75	Haley	Waller Pitts	hwallerpitts@fredlaw.com	Fredrikson & Byron, P.A.		60 S Sixth St Ste 1500 Minneapolis MN, 55402-4400 United States	Electronic Service		No	25-117 Official CC Service List
76	Elizabeth	Wheeler	ewheeler@cleangridalliance.org	Clean Grid Alliance		570 Asbury Street Suite 201 St. Paul MN,	Electronic Service		No	25-117 Official CC Service List

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						55104 United States				
77	Leanna	Whipple	lwhipple@itctransco.com	ITC Midwest LLC		100 East Grand Avenue, Suite 230 Des Moines IA, 50309 United States	Electronic Service		No	25-117 Official CC Service List
78	Joseph	Windler	jwindler@winthrop.com	Winthrop & Weinstine		225 South Sixth Street, Suite 3500 Minneapolis MN, 55402 United States	Electronic Service		No	25-117 Official CC Service List
79	Patrick	Woolsey	patrick.woolsey@sierraclub.org	Sierra Club		2101 Webster Street Suite 1300 Oakland CA, 94612 United States	Electronic Service		No	25-117 Official CC Service List
80	Kurt	Zimmerman	kwz@ibew160.org	Local Union #160, IBEW		2909 Anthony Ln St Anthony Village MN, 55418-3238 United States	Electronic Service		No	25-117 Official CC Service List
81	Patrick	Zomer	pzomer@cozen.com	Cozen O'Connor		150 S. 5th Street, #1200 Minneapolis MN, 55402 United States	Electronic Service		No	25-117 Official CC Service List