

May 5, 2026

Sasha Bergman
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, Minnesota 55101-2147

RE: Reply Comments of the Minnesota Department of Commerce
Docket No. E111/M-25-139

Dear Ms. Bergman,

Attached are the reply comments of the Minnesota Department of Commerce (Department) in the following matter:

In the Matter of Dakota Electric Association's 2025 Integrated Distribution Plan.

Dakota Electric Association's (DEA or the Association) was filed on November 3, 2025.

The Department recommends the Commission accept DEA's IDP with modifications and is available to answer any questions the Minnesota Public Utilities Commission may have.

Sincerely,

/s/ Dr. SYDNIE LIEB
Assistant Commissioner of Regulatory Analysis

RW/BP/AZ/CK/KB/DD/ad
Attachment



Before the Minnesota Public Utilities Commission

Comments of the Minnesota Department of Commerce

Docket No. E111/M-25-139

I. INTRODUCTION

Every two years, Dakota Electric Association (DEA or the Association) submits an Integrated Distribution Plan (IDP), which began with the Minnesota Public Utilities Commission's (Commission) February 20, 2019 Order Approving Integrated Distribution Planning Filing Requirements for DEA.¹ The primary mechanism by which IDPs operate is compliance with the Commission's established filing requirements. The Commission accepts the IDP if it finds that DEA complies with its established filing requirements.

The Department seeks to understand utility decision-making processes in order to cross-pollinate, when practicable, best practices among the rate-regulated utilities. At this stage, the Department is interested in the costs and benefits of different planning strategies.

It is the Department's goal to foster collaboration with each of the rate regulated utilities, rather than to make recommendations that utilities oppose. However, with key affordability concerns identified across the IDPs, the Department intends to advocate for the analysis of potentially cost saving strategies when practicable.

¹ *In the Matter of Distribution System Planning for Dakota Electric Association, Order Adopting Integrated Distribution Plan Filing Requirements*, February 20, 2019, Docket No. E-015/CI-18-255, (eDockets) [20192-150449-01](#) (hereinafter "February 20, 2019 Order").

II. ROCEDURAL BACKGROUND

September 16, 2024	The Commission filed its Order Accepting 2023 Integrated Distribution Plan and Modifying Filing Requirements. ²
November 3, 2025	DEA files its 2025 IDP. ³
November 13, 2025	The Commission issues its Notice of Comment Period in the present docket. ⁴
March 24, 2026	The Department files initial comments in response to DEA's 2025 IDP. ⁵
April 14, 2026	DEA files reply comments for its 2025 IDP. ⁶

Topic(s) open for comment:

1. Should the Commission accept or reject Dakota Electric Association's IDP?
2. Did Dakota Electric adequately address the Commission's IDP filing requirements and prior Orders, as outlined in Attachment A to this notice?
3. Feedback, comments, and recommendations on the following areas of Dakota Electric's IDP:
 - a. Non-wires alternatives analysis and potential pilot project
 - b. Planned grid modernization initiatives
 - c. Forecasted distribution budget
 - d. Distributed Energy Resource (DER) scenarios and forecasts
4. Other areas of Dakota Electric's IDP not listed above, along with any other issues or concerns related to this matter.

III. DEPARTMENT ANALYSIS

A. IDP SCHEDULE

The current biennial IDP schedule creates a significant barrier to participation for the Department and other stakeholder groups; the volume of the IDPs creates a highly concentrated workload for parties, which makes it difficult to manage staff time and interrelated or competing deadlines. The Department is concerned that the biennial IDP schedule especially limits participation in the IDPs by other parties. To foster enhanced participation in the IDPs, the Department recommends a revised annual IDP schedule to allow commenters more time to participate in the IDP process.

² *In the Matter of Distribution System Planning for Dakota Electric Association, Order Accepting 2023 Integrated Distribution Plan and Modifying Filing Requirements*, September 16, 2024, Docket No. E111/M-23-420, (eDockets) [20249-210229-01](#).

³ *In the Matter of Dakota Electric Association's 2025 Integrated Distribution Plan*, Dakota Electric Association, November 3, 2025, Docket No. E-111/M-25-139, (eDockets) [202511-224614-03](#), (hereinafter "2025 IDP").

⁴ *Notice of Comment Period*, November 13, 2025, Docket No. E111/M-25-139, (eDockets) [202511-224921-01](#) (hereinafter "Notice").

⁵ Department, Comments, March 24, 2026, Docket No. E111/M-25-139, (eDockets) [202511-229585-01](#) (hereinafter "Department Initial Comments").

⁶ Dakota Electric Association, Comments, April 14, 2026, Docket No. E111/M-25-139, (eDockets) [20264-230392-01](#) (hereinafter "DEA Reply Comments").

The Department recommends the Commission order either A or B:

- A. Xcel file its IDP, TEP, and IDP-Related Ad Hoc filings in odd-numbered years. MP, DEA, and OTP file their IDP and TEP in even-numbered years, with the next filing due in 2028.**
- B. All IDPs are filed in odd-numbered years. All TEPs and IDP-Related Ad Hoc Filings are filed in even-numbered years, with the next filing due in 2028.**

The Department's preference is A. However, B., or any modifications of A. or B. would be acceptable, so long as the workload is spread annually rather than biennially. The Department cross files this recommendation in each of the rate-regulated utilities' IDPs.

A.1. Final Recommendations

The Department makes one new recommendation:

The Department recommends the Commission order either A or B:

- A. Xcel file its IDP, TEP, and IDP-Related Ad Hoc filings in odd-numbered years. MP, DEA, and OTP file their IDP and TEP in even-numbered years, with the next filing due in 2028.
- B. All IDPs are filed in odd-numbered years. All TEPs and IDP-Related Ad Hoc Filings are filed in even-numbered years, with the next filing due in 2028.

B. FORECASTED DISTRIBUTION BUDGET

In its initial comments, the Department requested:

DEA explain in its reply comments:

- A. How DEA forms its budget and makes allocation decisions between different investment opportunities;
- B. Whether DEA sets a budget limit for each year, and if so, how this number is determined; and
- C. How DEA ensures that system condition and reliability are maintained under a restricted budget.

The Department stated the following in response to Dakota's budget categories:

These four budget categories [age related replacement, capacity, reliability, and grid modernization] highlight deliberate decision making on behalf of DEA distribution planners to control DEA's spending. In two examples, the Department highlights how DEA lowers spending in one budget category in order to increase spending in another. The result of

these decisions is a stable distribution budget, which does not put pressure on DEA's members beyond the broader economic forces driving inflation [*clarification of budget categories added*].⁷

The Association provided additional clarification in its reply comments, stating that DEA made several changes to its IDP spending categories in response to a change in filing requirements, as noted in its IDP report:

Dakota Electric appreciates the Commission and Staff for modifying this filing requirement to allow this data to be categorized into a 'high-level' look at distribution spending. For the 2025 IDP Report, Dakota Electric has reconfigured some of the codes and budget categories. This may cause an increase or decrease in some categories versus how costs were previously attributed to each category in past IDPs. Years 2020, 2021, and 2022 have not changed from what was reported in the 2023 IDP.⁸

DEA states that because of this reconfiguration of the budget categories, the significant changes observed by the Department are not necessarily deliberate decision making by DEA to control spending.⁹ The Association asserts that the reconfiguration of its budget categories are rather a reallocation between the categories to ease the burden of reporting.¹⁰ The Department makes the following new recommendation:

The Department recommends the Commission require Dakota Electric Association, in its next IDP, to further clarify how its reporting has changed for each of the distribution budget categories. The Department recommends the discussion include examples of the investments that have been reclassified and how the reclassification affects the characterization of the Association's IDP budget compared to the years prior to reconfiguration of its budget reporting categories.

DEA also clarifies its load growth history in response to a Department statement that the Association has experienced relatively flat load growth throughout most of its history.¹¹ The Department appreciates the clarification that DEA has only relatively recently experienced flat load growth, and has previously experienced sustained, and at times rapid, load growth throughout its history.¹² The Department regrets this mischaracterization.

In initial comments, the Department asked how DEA forms its budget and makes allocation decisions. The Department also asked DEA to clarify whether it sets a budget cap each year, and if so, how the

⁷ Department Initial Comments, at 8.

⁸ DEA Reply Comments, at 5.

⁹ *Ibid.*

¹⁰ *Ibid.*

¹¹ Department Initial Comments, at 11.

¹² DEA Reply Comments, at 6.

cap is determined.¹³ DEA states that it annually presents its Board of Directors (Board) a three-year construction workplan budget. The budget is then reviewed and approved, if the Board determines the budget to be reasonable.¹⁴ The budget contains planned investment categories such as new customers and service rebuilds, mainlines, substations and distribution equipment.¹⁵ However, although specific projects are included if identified before budget approval, certain unplanned projects, such as a road relocation project, may occur within a budget year with little pre-planning. If an unplanned project occurs, DEA states it may elect to defer an internally driven project to comply with the externally driven/required projects to maintain its Board-approved budget. The Association also clarifies that projects related to reliability, capacity, repairability, age, or condition are selected based on highest priority needs.¹⁶ To answer the Department's question regarding a yearly budget limit, the Association states that its Board does not employ an annual cap to its budget. The Board can make discreet adjustments to the budget, if it deems the adjustment reasonable. DEA reiterates that the three-year construction workplan budget is approved annually.¹⁷

Further, in its initial comments, the Department asked DEA to explain how it ensures that system condition and reliability are maintained under a restricted budget.¹⁸ The Association states that its budget is prepared at the most detailed level possible and, as such, is intended to identify specific system needs to improve system conditions and performance. DEA states that it builds in periodic maintenance schedules for most of the equipment on its system—including specific amounts for aging equipment and pole replacement. The Association also states that instead of having a specific focus on reliability in a given budget, DEA has created construction and process standards that focus on reliability and has tried to include a focus on reliability over time (*i.e.* reliability is implicitly included in prior or ongoing projects).¹⁹ The Association reiterates that, if an unplanned investment is needed, the funding for internally driven projects would be adjusted to make sure the Board-approved budget is maintained.²⁰ The Department appreciates the Association's budget-related responses in its reply comments, and looks forward to continued discussion in the next IDP. The Department makes the following new recommendation regarding the Association's construction and process standards:

The Department recommends the Commission require Dakota Electric Association to include, in its next IDP, a discussion of its construction and process standards that focus on reliability and how the standards are used to build the Association's construction workplan budget.

B.1. Final Recommendations

The Department makes the following new recommendations:

¹³ Department Initial Comments, at 8.

¹⁴ DEA Reply Comments, at 6.

¹⁵ *Ibid.*

¹⁶ *Id.*, at 6-7.

¹⁷ *Id.*, at 7.

¹⁸ *Id.*, at 7.

¹⁹ *Id.*, at 8.

²⁰ *Ibid.*

The Department recommends the Commission require Dakota Electric Association, in its next IDP, to further clarify how its reporting has changed for each of the distribution budget categories. The Department recommends the discussion include examples of the investments that have been reclassified and how the reclassification affects the characterization of the Association's IDP budget compared to the years prior to reconfiguration of its budget reporting categories.

The Department recommends the Commission require Dakota Electric Association to include, in its next IDP, a discussion of its construction and process standards that focus on reliability and how the standards are used to build the Association's construction workplan budget.

C. CAPACITY

In its initial comments, the Department requested:

DEA explain in reply comments how the Association views capacity overload risks at its substations and the need for capacity mitigations with historic or existing substation transformer overloads. DEA should discuss why the Association has no plans to mitigate substation transformer capacity risks at the Deerwood, Lemay Lake, Lebanon Hills, and Apple Valley substations.²¹

DEA states that its substation transformers are engineered with several temperature and cooling levels; each level has increasing load capacities. The Association also states that DEA evaluates substation loads every year to confirm that equipment limits are not exceeded and that each substation can reliably handle both normal and contingency scenarios. The substation transformers at Deerwood, Lemay Lake, Lebanon Hills, and Apple Valley, feature multiple cooling stages (ONAN/ONAF/ONAF) along with different continuous ratings. DEA clarifies that using a transformer above its base (ONAN) rating does not qualify as overload or emergency operation, nor does it negatively impact the transformer's condition. Moreover, according to Appendix A of the IDP, none of the substation transformers were run²² beyond their nameplate specifications.²³ The nameplate ratings for the listed transformers are as follows:

- Deerwood/ Apple Valley Substations
 - @55 deg C 21/28/35 MVA ONAN/ONAF/ONAF
 - @65 deg C 24/32/39 MVA ONAN/ONAF/ONAF
- Lemay Lake/Lebanon Substations
 - @55 deg C 20/27/33 MVA ONAN/ONAF/ONAF
 - @65 deg C 22/30/37 MVA ONAN/ONAF/ONAF²⁴

²¹ Department Initial Comments, at 11.

²² DEA Reply Comments, at 8.

²³ 2025 IDP, Appendix A.

²⁴ DEA Reply Comments, at 9.

Further in its initial comments, the Department discussed the Association's capacity planning standards.²⁵ The Department sought to better understand the Association's approach to mitigating capacity risks on its distribution system. In response to Department IR 22, DEA described how it makes asset replacement decisions, stating it "plans for the overall MW the area might experience and replaces or constructs the asset based on current design standards and cost effectiveness."²⁶ In initial comments, the Department requested the Association further clarify how:

[T]he Association incorporates cost-effectiveness metrics into its project-level and design-standard review processes, and explain how these metrics affect DEA's asset replacement decision process.²⁷

DEA responded in its reply comments:

Project-level designs are analyzed for upfront installation costs, and we compare these designs to the constructability of different styles of design (e.g. overhead vs. underground construction). Feasibility of construction, land accessibility, and future maintenance are generally considered, but Dakota Electric focuses cost considerations on the upfront installation cost. Beyond installation cost considerations though, it is important to note that design-standard review processes focus more on engineering analysis and planning rather than cost effectiveness. Although not explicit in any calculations, Dakota Electric believes that designing the distribution system with assumptions or considerations for future load growth is a cost-effective way to plan the distribution system. When reviewing asset replacement decisions, newer design standards are followed to ensure consistency, reliability, and safety. These design standard driven decisions may result in an outcome that is more costly, but it may also represent a decision based on newer planning and engineering assumptions that can drive improved reliability and service. When looking at the Cooperative's distribution planning approach as it relates to cost-effectiveness metrics, Dakota Electric clearly is interested in minimizing costs so that the rates our members pay are affordable. However, the decisions that we make in terms of planning the system lean more toward maximizing the service we provide our members and the overall reliability they see from their electrical service.

The Department appreciates DEA's response and inherent focus on service, safety and reliability. From the Association's response, the Department understands that design standards (focused more on the engineering and planning of the system) guide the Association's decision-making process more than the cost-effectiveness of a proposed project. DEA states that it focuses its cost considerations on the

²⁵ Department Initial Comments, at 11.

²⁶ DEA Response to Department IR 22. See Attachment A.

²⁷ Department Initial Comments, at 13.

upfront installation costs of the project and compares installation costs to different potential design options, but cost considerations do not extend past the installation costs of a project. The Association also states that its design standard driven projects may result in a more costly project, but that a design standard driven process may implement newer engineering and planning standards that improve reliability of the system.²⁸ The Association discusses that its process leans more toward maximizing service and overall reliability than cost-effectiveness analysis, though DEA is interested in minimizing costs so customer rates are affordable.²⁹

The Department does not make an official recommendation on DEA's capacity planning standards or on substation capacity at this time, but looks forward to continued discussions in future IDPs as to how DEA optimizes its system for reliability and safety while maintaining affordability for its ratepayers.

Finally, in initial comments, the Department cited to a forthcoming response to its IR 34. The Department has included DEA's response as an attachment to the present comments.

C.1. Final Recommendations

The Department does not make any recommendations in this section.

D. RELIABILITY

D.1. Vegetation Management

In its initial comments, the Department requested data on the number of outages caused by trees for years 2020 to 2025. The Department had requested:

The Department requests DEA present in its reply comments data on the number of "Trees" outages in the years 2020, 2021, 2022, and 2025, as available.³⁰

The Department requested this information because vegetation is the leading cause of outages on DEA's system and DEA has substantially increased its vegetation-management efforts in recent years, as detailed in the Department's initial comments. Given that DEA has linked increased investments to expected reliability improvements, the Department sought a longer run of tree-outage data to better assess whether the program is producing measurable results over time. The request was also intended to distinguish a durable reliability trend from normal year-to-year variation, including changes driven by weather or other external factors. For that reason, the Department asked DEA to provide additional annual outage counts so the record would better show whether increased vegetation spending is translating into fewer tree-related outages.

²⁸ DEA Reply Comments, at 9.

²⁹ *Id.*, at 9-10.

³⁰ Department Initial Comments, at 15.

The Department appreciates that DEA provided the requested tree-outage data; see Table 1.

Table 1. DEA’s tree-related outages, 2020-2025.

Year	2020	2021	2022	2023	2024	2025
# of Tree Outages	229	119	191	156	210	214

The data in Table 1 above is helpful, but they do not yet establish the effectiveness of DEA’s increased vegetation-management spending because DEA also explains that its outage classification changed in 2020 and that the first full vegetation-management cycle is now expected to take 8-10 years, rather than the earlier expected 4-5 years:

As noted in our 2019 SRSQ report, we anticipated that it would take approximately 4-5 years to get through the entire overhead system and tree trimming backlog. However, as we have worked through our systematic vegetation management process, we concluded that the 4-5 year timeframe was incorrect and significantly underestimated. Based off our actual experience to date, we now expect it will take 8-10 years to complete the first cycle of overhead system trimming.

[...]

From a practical standpoint when looking at reliability metrics, Dakota Electric also notes that our increase investments in vegetation management will likely take some time before the data will reflect reduced outages due to trees.

The Department views the tree-outage counts as informative, but not yet sufficient to demonstrate the magnitude of reliability benefits from the program.

D.2. Value of Reliability

In its initial comments, the Department recommended that the Association quantify the value of major reliability and resiliency investments using a customer interruption cost approach. The Department stated:

The Department recommends the Commission require DEA to quantify the value of major reliability and resiliency investments, such as strategic undergrounding, using a recognized customer interruption cost approach (e.g., an Interruption Cost Estimate [ICE] calculator methodology) and to apply that value consistently in cost-benefit comparisons across alternatives.³¹

The Department made this recommendation because DEA does not currently monetize outage reductions or use a monetized value of customer outage impacts in its project comparisons. In reply comments, DEA states that it disagrees with this recommendation, that such analysis would create additional reporting burden, and that investments such as strategic undergrounding may not be cost-beneficial in the traditional sense:

Dakota Electric respectfully disagrees with this recommendation and does not believe it is necessary. Although the Cooperative understands the premise of the Department's recommendation, this request would constitute significant additional reporting and data collection within the Cooperative.

The Department's recommendation is necessary because without an analytical framework to quantify costs and compare alternatives, the filings limit the determination of whether higher-cost reliability measures, including strategic undergrounding, provide benefits commensurate with their cost relative to other available alternatives. The Department believes that administrative burden, by itself, is not a sufficient reason to forgo an analytical tool that would improve transparency, comparability, and decision making for major distribution investments.

The Department maintains the recommendation that DEA quantify the value of major reliability and resiliency investments using a recognized customer interruption cost approach, such as an ICE methodology:

The Department recommends the Commission require DEA to quantify the value of major reliability and resiliency investments, such as strategic undergrounding, using a recognized customer interruption cost approach (e.g., an Interruption Cost Estimate [ICE] calculator methodology) and to apply that value consistently in cost-benefit comparisons across alternatives.³²

The Association also stated that the value of reliability recommendation is closely aligned with service quality and reliability metrics in its annual Safety, Reliability, and Service Quality (SRSQ) Report:

[...] the Cooperative believes this recommendation is more closely aligned with service quality, not distribution system planning. Dakota Electric

³¹ Department Initial Comments, at 17.

³² *Ibid.*

provides its annual SRSQ Report as an informal filing to the Commission and as a cooperative electric association our elected Board of Directors oversees service quality. Dakota Electric may wish to include this type of information as part of our annual SRSQ reports provided to our Board of Directors, but it is unclear additional value these metrics will provide in light of our current service quality and reliability metrics.³³

The Department respectfully disagrees with the Association's statement. The Department views strategic undergrounding as both a service-quality reporting issue and a planning issue because the IDP is where the Commission evaluates future distribution investments, alternatives, and the costs and benefits of those investments. The Department's recommendation does not require DEA to report on past reliability performance. Rather, the Department asks DEA to use a consistent method to compare reliability tools before the program expands. The SRSQ reports can still be the place to track realized reliability outcomes after projects are implemented, but it is not a substitute for upfront evaluation of whether the chosen reliability tool is the best-value option.

D.3. Strategic Undergrounding

In its initial comments, the Department noted that strategic undergrounding is a new program for DEA and that other tools, including vegetation management and fault location, isolation, and service restoration, may also produce meaningful reliability improvements.³⁴ DEA's reply comments confirm that it has not yet developed a formal strategic undergrounding program and that it will consider other reliability tools as part of future planning. The Association stated:

[...] the decisions that Dakota Electric makes on many system planning measures, including strategic undergrounding, is driven less by looking at items from a cost benefit perspective and more through the lens of trying to maximize service to our members.³⁵

However, in its reply comments, the Association stated that it expects to review various reliability tools:

Dakota Electric appreciates this suggestion from the Department, and the Cooperative expects to regularly review various reliability tools to determine which provide the best overall reliability and service experience for members at a reasonable cost.³⁶

The Department appreciates DEA's willingness to evaluate its strategic undergrounding program along with other reliability tools available and maintains its recommendation from the Department's initial comments:

³³ DEA Reply Comments, at 12.

³⁴ Department Initial Comments, at 18.

³⁵ DEA Reply Comments, at 12.

³⁶ *Id.*, at 13.

The Department recommends that strategic undergrounding should be evaluated alongside other reliability tools that can materially reduce outage minutes on targeted feeders.³⁷

D.4. Final Recommendations

The Department maintains the following recommendations:

The Department recommends the Commission require DEA to quantify the value of major reliability and resiliency investments, such as strategic undergrounding, using a recognized customer interruption cost approach (e.g, an Interruption Cost Estimate [ICE] calculator methodology) and to apply that value consistently in cost-benefit comparisons across alternatives.

The Department recommends that strategic undergrounding should be evaluated alongside other reliability tools that can materially reduce outage minutes on targeted feeders.

E. AGE RELATED REPLACEMENTS AND ASSET RENEWAL

In its initial comments, the Department requested that Dakota Electric explain transformer replacement timing decisions and their impact on DEA's budget. The Department stated:

The Department requests that DEA explain in reply comments how the Association determines the need to replace its substation transformers and how both failure rates and transformer overloads are factored into substation transformer asset replacement decisions.³⁸

The Association provided additional clarification in its reply comments, stating that DEA originally discussed the need to replace substation transformers and equipment in the Association's IDP Report. Additionally, DEA states it prioritizes its substation replacement based on several factors including: age, historical loading, manufacturer/availability of repair parts, and history of failures. The Association selects the substations with the highest risk factors for replacement first and considers how these projects dovetail with existing, or likely, staff workloads.³⁹

The Department appreciates the Association's clarification of its transformer replacement timing decisions in its reply comments and looks forward to continued discussion in the next IDP. In future IDPs the Department would like DEA to continue clarifying how it determines the need to replace its substation transformers and how both failure rates and transformer overloads are factored into

³⁷ Department Initial Comments, at 19.

³⁸ *Id.*, at 22.

³⁹ DEA Reply Comments, at 13.

substation transformer asset replacement decisions. The Department does not make a formal recommendation at this time.

In its initial comments, the Department also requested that DEA explain how it determined that switchgear replacement is the most cost-effective strategy the Department stated:

The Department requests DEA to explain in reply comments how the Association determined that switchgear replacement is the most cost-effective option. The explanation should detail what other alternatives were evaluated and what costs were included in this analysis.⁴⁰

The Association clarified in its reply comments that when analyzing switchgear, the only options available are to either refurbish or replace the switchgear. Refurbishing the equipment would entail replacing the breakers and relays; however, DEA states it would have difficulty acquiring replacement components because some models are obsolete. Further, DEA states the upgrades would require the entire breaker lineup to change and require significant changes to internal wiring. Due to the amount of changes required to refurbish, and the risks with complexities in refurbishing switchgear, DEA concluded that replacement of the entire switchgear building was the most reasonable approach.⁴¹

The Department looks forward to continued discussion related to switchgear replacement in the next IDP, including the evaluation of the option of continued operations. The Department would like DEA to continue considering and quantifying the tradeoffs, including costs, inherent with these decisions. The Department does not make a formal recommendation at this time.

In its initial comments, the Department requested that DEA explain why its Single Phase Fuse Cabinets Program is preferable to a phased replacement approach. The Department stated:

The Department requests DEA explain in reply comments why its Single Phase Fuse Cabinets Program is preferable to a phased approach where the existing fuse cabinets are replaced at their expected end of life.⁴²

The Association provides additional clarification in its reply comments. DEA states that the Association had significant difficulty securing a manufacturer that was willing to supply a small amount of single-phase fuse cabinets on an annual basis. As a result, DEA retained cabinets in service past their expected end of life, which led to increased failures, with minimal replacement inventory. In addition, DEA states that single-phase fuse cabinets are no longer a standard design for Dakota Electric and determined that the cost of reconfiguring the primary conductors and equipment to newer designs were economically unfavorable. The Single Phase Fuse Cabinets Program allowed DEA to secure a

⁴⁰ Department Initial Comments, at 23.

⁴¹ DEA Reply Comments, at 14.

⁴² *Ibid.*

manufacturer to produce cabinets in a higher order quantity, and based on current design standards, which resulted in a significantly lower cost option.⁴³

The Department appreciates the Association's explanation related to the Single Phase Fuse Cabinets Program and looks forward to continued discussion in the next IDP.

E.1. Final Recommendations

The Department does not make any recommendations in this section.

F. WILDFIRE MITIGATION

In its initial comments, the Department requested DEA clarify when its wildfire mitigation plan would be completed.⁴⁴ Dakota Electric states in its reply comments that expects its wildfire mitigation plan to be complete and ready for implementation by the end of 2026.⁴⁵

Further, the Department also recommended the Commission require DEA to file its WMP in its next IDP with additional filing requirements. The Department stated:

The Department recommends the Commission require Dakota Electric to file its wildfire mitigation plan, when complete, as a supplement or attachment to its IDP. DEA's filing should include a map of the Association's wildfire risk and its methodology for creating the map, any identified areas of particularly high fire risk, the probability and financial damage of these events, the proposed wildfire mitigation budget, and a full cost benefit analysis of the proposed mitigation measures.⁴⁶

The Department unfortunately neglected to clarify that its recommendation in initial comments was for the *next* IDP, not the current IDP. The Department appreciates and agrees with the analysis from the Association regarding the completion of its WMP by the end of 2026 and the ability for DEA to file its WMP with the next IDP, to be filed in 2027.⁴⁷ The Department makes the following modified recommendation to specify that the WMP should be filed with the 2027 IDP:

The Department recommends the Commission require Dakota Electric to file its wildfire mitigation plan, ~~when complete,~~ as a supplement or attachment to its next IDP, to be filed in 2027. DEA's filing should include a map of the Association's wildfire risk and its methodology for creating the map, any identified areas of particularly high fire risk, the probability and potential financial damage of these events, the proposed wildfire mitigation budget, and a full cost benefit analysis of the proposed mitigation measures.

⁴³ DEA Reply Comments, at 14.

⁴⁴ Department Initial Comments, at 24.

⁴⁵ DEA Reply Comments, at 15.

⁴⁶ Department Initial Comments, at 24.

⁴⁷ DEA Reply Comments, at 15.

F.1. Contractual Services for WMP review

As WMPs are relatively new for utility planning dockets as well as for regulator and stakeholder review, the Department anticipates that the review of each utility's WMP would be significantly improved by the addition of a contractor. An outside contractor would bring additional insight and WMP expertise that is not currently housed within the Department. The Department estimates that contractual services could cost up to \$300,000 for review of all four of the rate-regulated utilities' WMP. The Department estimates these costs in the context of the costs incurred for contractual services in Xcel and OTP's ongoing rate cases to review proposed wildfire expenditures. The Department anticipates hiring one contractor for review of all the utilities' WMP in the next IDP cycle—resulting in approximately a two-year contract. The Department asserts that proper review of utility WMP could aid in balancing the risk of wildfire in each utility territory and the costs to Minnesota ratepayers. WMPs have the potential to be a significant spending category, which raises important affordability questions for Minnesota ratepayers.

The Department recommends the Commission authorize the Department to spend up to \$300,000 total to obtain contractual services for the review of all four rate-regulated utilities' wildfire mitigation plans.

F.2. Final Recommendations

The Department makes the following new recommendation:

The Department recommends the Commission authorize the Department to spend up to \$300,000 total to obtain contractual services for the review of all four rate-regulated utilities' wildfire mitigation plans.

The Department makes the following modified recommendation:

The Department recommends the Commission require Dakota Electric to file its wildfire mitigation plan as a supplement or attachment to its next IDP, to be filed in 2027. DEA's filing should include a map of the Association's wildfire risk and its methodology for creating the map, any identified areas of particularly high fire risk, the probability and potential financial damage of these events, the proposed wildfire mitigation budget, and a full cost benefit analysis of the proposed mitigation measures.

IV. DEPARTMENT RECOMMENDATIONS

Based on analysis of Dakota Electric's 2025 IDP and the information in the record, the Department has prepared recommendations, which are provided below.

A. IDP SCHEDULE

- A.1. The Department recommends the Commission order either A or B:

- A. Xcel file its IDP, TEP, and IDP-Related Ad Hoc filings in odd-numbered years. MP, DEA, and OTP file their IDP and TEP in even-numbered years, with the next filing due in 2028.
- B. All IDPs are filed in odd-numbered years. All TEPs and IDP-Related Ad Hoc Filings are filed in even-numbered years, with the next filing due in 2028.

B. FORECASTED DISTRIBUTION BUDGET

- B.1. The Department recommends the Commission require Dakota Electric Association, in its next IDP, to further clarify how its reporting has changed for each of the distribution budget categories. The Department recommends the discussion include examples of the investments that have been reclassified and how the reclassification affects the characterization of the Association's IDP budget compared to the years prior to reconfiguration of its budget reporting categories.
- B.2. The Department recommends the Commission require Dakota Electric Association to include, in its next IDP, a discussion of its construction and process standards that focus on reliability and how the standards are used to build the Association's construction workplan budget. Write out all recommendations in bulleted list format in this section.

D. RELIABILITY

- D.1. The Department recommends the Commission require DEA to quantify the value of major reliability and resiliency investments, such as strategic undergrounding, using a recognized customer interruption cost approach (e.g, an Interruption Cost Estimate [ICE] calculator methodology) and to apply that value consistently in cost-benefit comparisons across alternatives.
- D.2. The Department recommends that strategic undergrounding should be evaluated alongside other reliability tools that can materially reduce outage minutes on targeted feeders.

F. WILDFIRE MITIGATION

- F.1. The Department recommends the Commission authorize the Department to spend up to \$300,000 total to obtain contractual services for the review of all four rate-regulated utilities' wildfire mitigation plans.
- F.2. The Department recommends the Commission require Dakota Electric to file its wildfire mitigation plan as a supplement or attachment to its next IDP, to be filed in 2027. DEA's filing should include a map of the Association's wildfire risk and its methodology for creating the map, any identified areas of particularly high fire risk, the probability and potential financial damage of these events, the proposed wildfire mitigation budget, and a full cost benefit analysis of the proposed mitigation measures.

Attachments



Minnesota Department of Commerce
85 7th Place East | Suite 280 | St. Paul, MN 55101
Information Request

Docket Number: E-111/M-25-139
Requested From: Dakota Electric Association
Type of Inquiry: General

☐ Nonpublic ☒ Public
Date of Request: 1/15/2026
Response Due: 1/26/2026

SEND RESPONSE VIA EMAIL TO: Utility.Discovery@state.mn.us as well as the assigned analyst(s).

Assigned Analyst(s): Ari Zwick, Bhavin Pradhan, Adway De

Email Address(es): Ari.Zwick@state.mn.us, Bhavin.Pradhan@state.mn.us, Adway.De@state.mn.us

Phone Number(s): 651-539-1675, 651-539-1724, 651-539-1724

ADDITIONAL INSTRUCTIONS:

Each response must be submitted as a text searchable PDF, unless otherwise directed. Please include the docket number, request number, and respondent name and title on the answers. If your response contains Trade Secret data, please include a public copy.

Request Number:	22
Topic:	Planning for Future Load Growth
Reference(s):	2025 Integrated Distribution Plan

Request:

When DEA needs to replace a system asset, please describe:

1. How many forecasted years DEA will consider in its analysis.
 - a. If the forecast varies by project or asset type, please provide a summary of how the forecast varies in different scenarios.
2. What data DEA includes in its analysis of the need for asset replacement.
3. How forecast uncertainty is accounted for in DEA's asset replacement methodology.

Response:

1. Some equipment is not impacted by load forecasts because they are not a planning critical part of the system's overall carrying capability. Equipment such as cable, conductors, and substations have more effect on overall current carrying capability and forecasts are considered as part of the planning and design. When planning for this type of equipment and upgrades, Dakota Electric considers the surrounding area and its potential growth and land uses for how our system may look in the future. This future analysis does not generally look at design from a year specific perspective, except for long-lead time equipment, but rather total load for the area. This load may all show up in one year or many years in the future. Dakota Electric plans for the overall MW the area might experience and replaces or constructs the asset based on current design standards and cost effectiveness.

To be completed by responder

Response Date: January 26, 2026

Response by: Adam Heinen (Vice President, Regulatory Services), Alex Nelson (System Design Manager), Trevor Hauck (Engineering Services Manager), Kwadwo Safo (Senior Electrical Engineer), John Berge (Grid Modernization Manager)

Email Address: aheinen@dakotaelectric.com

Phone Number: 651-463-6258



Minnesota Department of Commerce
85 7th Place East | Suite 280 | St. Paul, MN 55101
Information Request

Docket Number: E-111/M-25-139
Requested From: Dakota Electric Association
Type of Inquiry: General

☐ Nonpublic ☒ Public
Date of Request: 1/15/2026
Response Due: 1/26/2026

SEND RESPONSE VIA EMAIL TO: Utility.Discovery@state.mn.us as well as the assigned analyst(s).

Assigned Analyst(s): Ari Zwick, Bhavin Pradhan, Adway De

Email Address(es): Ari.Zwick@state.mn.us, Bhavin.Pradhan@state.mn.us, Adway.De@state.mn.us

Phone Number(s): 651-539-1675, 651-539-1724, 651-539-1724

ADDITIONAL INSTRUCTIONS:

Each response must be submitted as a text searchable PDF, unless otherwise directed. Please include the docket number, request number, and respondent name and title on the answers. If your response contains Trade Secret data, please include a public copy.

(Continued)

2. Dakota Electric considers a number of items as part of our asset replacement analysis. In particular, Dakota Electric considers items such as age of asset, current physical condition of asset, criticality of the asset, ease of maintenance (e.g., parts available), fault/amp ratings, current design needs, future design needs, current operation standards. In addition, when replacing an asset we are guided by our current design standards, unless there is a known upgrade we want to make. For example, if we use a 336 ACSR overhead conductor, we may replace it with 477 ACSR because this is our current standard and max conductor size. Dakota Electric does periodically review these standards to determine their effectiveness based on long range forecasts, typically 20 years.
3. Dakota Electric's approach to asset replacement assumes worst case scenario planning. By assuming a worst case scenario, this accounts for forecast uncertainty.

To be completed by responder

Response Date: January 26, 2026

Response by: Adam Heinen (Vice President, Regulatory Services), Alex Nelson (System Design Manager), Trevor Hauck (Engineering Services Manager), Kwadwo Safo (Senior Electrical Engineer), John Berge (Grid Modernization Manager)

Email Address: aheinen@dakotaelectric.com

Phone Number: 651-463-6258



Minnesota Department of Commerce
85 7th Place East | Suite 280 | St. Paul, MN 55101
Information Request

Docket Number: E111/M-25-139

Requested From: Dakota Electric Association

Type of Inquiry: General

☐ Nonpublic ☒ Public

Date of Request: 3/18/2026

Response Due: 3/30/2026

SEND RESPONSE VIA EMAIL TO: Utility.Discovery@state.mn.us as well as the assigned analyst(s).

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Phone Number(s): 651-539-1675, 651-539-1025

ADDITIONAL INSTRUCTIONS:

Each response must be submitted as a text searchable PDF, unless otherwise directed. Please include the docket number, request number, and respondent name and title on the answers. If your response contains Trade Secret data, please include a public copy.

Request Number:	34
Topic:	N-0 Capacity Mitigation Planning Standard
Reference(s):	2025 Integrated Distribution Plan

Request:

Please describe if Dakota Electric Association uses a firm percent loading criterion to mitigate N-0 capacity risks for substation transformers, feeders, and tap lines.

- A. If Dakota Electric Association does not use a firm percentage, please provide a range at which Dakota Electric Association would consider making capacity upgrades.
- B. If Dakota Electric Association uses different percent loading criteria or ranges based on equipment type, please outline each criterion by equipment type individually.

Response:

Dakota Electric does not apply a fixed N-0 loading threshold for capacity upgrades. However, Dakota Electric monitors N-0 loading to ensure that equipment operates within their ratings and that there is adequate flexibility to manage the system safely and reliably. Currently, the loading criterion to mitigate N-0 capacity risks for Dakota Electric's substation transformers and feeders is 90% of the nameplate rating. Capacity upgrades are mainly evaluated on the ability of the substation transformer and feeders to support N-1 contingencies, but N-0 loading is also considered. Typically, capacity upgrades are considered if we cannot reconfigure existing system conditions or make operational changes to accommodate capacity risks. Tap lines are upgraded if the loading exceeds equipment ratings.

To be completed by responder

Response Date: March 27, 2026

Response by: Adam Heinen

Email Address: aheinen@dakotaelectric.com

Phone Number: 651-462-6258

PUBLIC: Approved for public release. No restrictions on distribution

CERTIFICATE OF SERVICE

I, Sharon Ferguson, hereby certify that I have this day, served copies of the following document on the attached list of people 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. E111/M-25-139

Dated this 5th day of **May 2026**

/s/Sharon Ferguson

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7	MK	Anderson	anderson@fresh-energy.org	Fresh Energy		408 St Peter Street Saint Paul MN, 55102 United States	Electronic Service		No	M-25-139
8	David	Assaf	daassaf@flaherty-hood.com	Flaherty & Hood, P.A.		525 Park Street Suite 470 St. Paul MN, 55102 United States	Electronic Service		No	M-25-139
9	Donna	Attanasio	dattanasio@gwu.edu	George Washington University		2000 H Street NW Washington DC, 20052 United States	Electronic Service		No	M-25-139
10	John	Bailey	bailey@ilsr.org	Institute For Local Self-Reliance		1313 5th St SE Ste 303 Minneapolis MN, 55414 United States	Electronic Service		No	M-25-139
11	Anjali	Bains	bains@fresh-energy.org	Fresh Energy		408 Saint Peter Ste 220 Saint Paul MN, 55102 United States	Electronic Service		No	M-25-139
12	Mark	Bakk	mbakk@lcp.coop	Lake Country Power		26039 Bear Ridge Drive Cohasset MN, 55721 United States	Electronic Service		No	M-25-139
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14	Shay	Banton	shayb@irecusa.org	Interstate Renewable Energy Council		600 H Street NE Apt. 341 Washington DC, 20002 United States	Electronic Service		No	M-25-139
15	Gail	Baranko	gail.baranko@xcelenergy.com	Xcel Energy		414 Nicollet Mall 7th Floor Minneapolis MN, 55401 United States	Electronic Service		No	M-25-139

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18	Jeff	Benson	jbenson@southcentralelectric.com	South Central Electric Association		PO Box 150 71176 Tiell Drive St. James MN, 56081 United States	Electronic Service		No	M-25-139
19	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	M-25-139
20	Derek	Bertsch	derek.bertsch@mrenergy.com	Missouri River Energy Services		3724 West Avera Drive PO Box 88920 Sioux Falls SD, 57109-8920 United States	Electronic Service		No	M-25-139
21	Barb	Bischoff	barb.bischoff@nngco.com	Northern Natural Gas Co.		CORP HQ, 714 1111 So. 103rd Street Omaha NE, 68124-1000 United States	Electronic Service		No	M-25-139
22	Ingrid	Bjorklund	ibjorklund@avisenlegal.com	Avisen Legal		901 S. Marquette Ave. #1675 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-139
23	Ingrid	Bjorklund	ingrid@bjorklundlaw.com	Bjorklund Law, PLLC		855 Village Center Drive #256 North Oaks MN, 55127 United States	Electronic Service		No	M-25-139
24	William	Black	bblack@mmua.org	MMUA		Suite 200 3131 Fernbrook Lane North Plymouth MN, 55447 United States	Electronic Service		No	M-25-139
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26	Jon	Brekke	jbrekke@grenergy.com	Great River Energy		12300 Elm Creek Boulevard Maple Grove MN, 55369-4718 United States	Electronic Service		No	M-25-139
27	Kathleen	Brennan	kbrennan@spencerfane.com	Spencer Fane LLP		100 South Fifth Street, Suite 2500 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-139
28	Sydney R.	Briggs	sbriggs@swce.coop	Steele-Waseca Cooperative Electric		2411 W. Bridge St PO Box 485 Owatonna MN, 55060-	Electronic Service		No	M-25-139

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31	Ed	Brolin	ed.brolin@rwe.com	RWE Clean Energy		100 Summit Lake Drive Suite 210 Valhalla NY, 10595 United States	Electronic Service		No	M-25-139
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34	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	M-25-139
35	Jerry	Byer	jbyer@itasca-mantrap.com	Itasca-Mantrap Electric Cooperative		PO Box 192 Park Rapids MN, 56470 United States	Electronic Service		No	M-25-139
36	Jennifer	Cady	jjcady@mnpower.com	Minnesota Power		30 W Superior St Duluth MN, 55802 United States	Electronic Service		No	M-25-139
37	Daniel T	Carlisle	todd-wad@toddwadena.coop	Todd-Wadena Electric Cooperative		550 Ash Ave NE PO Box 431 Wadena MN, 56482 United States	Electronic Service		No	M-25-139
38	Douglas M.	Carnival	dcarnival@carnivalberns.com	McGrann Shea Carnival Straughn & Lamb		800 Nicollet Mall Ste 2600 Minneapolis MN, 55402-7035 United States	Electronic Service		No	M-25-139
39	Pat	Carruth	pat@mnvalleyrec.com	Minnesota Valley Coop. Light & Power Assn.		501 S 1st St. PO Box 248 Montevideo MN, 56265 United States	Electronic Service		No	M-25-139
40	Gabriel	Chan	gabechan@umn.edu			130 Hubert H. Humphrey Center 301 19th Ave S Minneapolis MN, 55455 United States	Electronic Service		No	M-25-139
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44	Joshua	Cohen	josh.cohen@swtchenenergy.com	SWTCH Energy, Inc.		Greentown Labs 444 Somerville Avenue Somerville MA, 02143 United States	Electronic Service		No	M-25-139
45	Kenneth A.	Colburn	kcolburn@symbioticstrategies.com	Symbiotic Strategies, LLC		26 Winton Road Meredith NH, 32535413 United States	Electronic Service		No	M-25-139
46	Steve	Coleman	stevecolemanpuma@gmail.com			231 Winifred St W Saint Paul MN, 55107 United States	Electronic Service		No	M-25-139
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48	Kevin	Cray	kevin@communitysolaraccess.org	CCSA		1644 Platte St Denver CO, 80202 United States	Electronic Service		No	M-25-139
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51	George	Damian	gdamian@cleanenergyeconomymn.org	Clean Energy Economy MN		13713 Washburn Ave S Burnsville MN, 55337 United States	Electronic Service		No	M-25-139
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53	James	Darabi	james.darabi@solarfarm.com			2355 Fairview Ave #101 St. Paul MN, 55113 United States	Electronic Service		No	M-25-139
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59	Cheryl	Dietrich	cheryl.dietrich@nexteraenergy.com	NextEra Energy Resources, LLC		700 Universe Blvd E1W/JB Juno Beach FL, 33408 United States	Electronic Service		No	M-25-139
60	Diane	Dietz	diane.dietz@state.mn.us		Department of Commerce	Suite 280 85 Seventh Place East St. Paul MN, 55101-2198 United States	Electronic Service		No	M-25-139
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69	Brian	Edstrom	briane@cubminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota St Ste W1360 Saint Paul MN, 55101 United States	Electronic Service		No	M-25-139
70	Dick	Edwards	dedwards@ci.maple-grove.mn.us	City of Maple Grove		12800 Arbor Lakes Parkway P O Box 1180 Maple Grove MN, 55311-6180 United States	Electronic Service		No	M-25-139

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72	Kristen	Eide Tollefson	healingsystems69@gmail.com	R-CURE		28477 N Lake Ave Frontenac MN, 55026-1044 United States	Electronic Service		No	M-25-139
73	Bob	Eleff	bob.eleff@house.mn	Regulated Industries Cmte		100 Rev Dr Martin Luther King Jr Blvd Room 600 St. Paul MN, 55155 United States	Electronic Service		No	M-25-139
74	R. Neal	Elliot	rnelliott@aceee.org	American Council for an Energy-Efficient Economy		ACEEE 529 14th St NW Ste 600 Washington DC, 20045 United States	Electronic Service		No	M-25-139
75	Nadav	Enbar	nenbar@epri.com	EPRI		1117 Quince Ave Boulder CO, 80304 United States	Electronic Service		No	M-25-139
76	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-25-139
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78	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-25-139
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84	Jessica	Fyhrie	jfyhrie@otpc.com	Otter Tail Power Company		PO Box 496 Fergus Falls MN, 56538-0496 United States	Electronic Service		No	M-25-139

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86	Allen	Gleckner	agleckner@elpc.org	Environmental Law & Policy Center		35 E. Wacker Drive, Suite 1600 Suite 1600 Chicago IL, 60601 United States	Electronic Service		No	M-25-139
87	Jenny	Glumack	jenny@mrea.org	Minnesota Rural Electric Association		11640 73rd Ave N Maple Grove MN, 55369 United States	Electronic Service		No	M-25-139
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92	Cody	Gustafson	cgustafson@mnpower.com			null null, null United States	Electronic Service		No	M-25-139
93	Tom	Guttormson	tom.guttormson@connexusenergy.com	Connexus Energy		14601 Ramsey Blvd Ramsey MN, 55303 United States	Electronic Service		No	M-25-139
94	Natalie	Haberman	townsend@fresh-energy.org	Fresh Energy		408 St Peter St # 350 St. Paul MN, 55102 United States	Electronic Service		No	M-25-139
95	Nicholas	Haeg	haeg@fresh-energy.org			12298 Bass Trail Sauk Centre MN, 56378 United States	Electronic Service		No	M-25-139
96	James	Haler	jhaler@southcentralelectric.com	South Central Electric Association		71176 Tiell Dr P. O. Box 150 St. James MN, 56081 United States	Electronic Service		No	M-25-139
97	Joe	Halso	joe.halso@sierraclub.org	Sierra Club		1536 Wynkoop St Ste 200 Denver CO, 80202 United States	Electronic Service		No	M-25-139
98	Donald	Hanson	dfhanson@ieee.org			P. O. Box 44579 Eden Prairie MN, 55344 United States	Electronic Service		No	M-25-139
99	John	Harlander	john.c.harlander@xcelenergy.com	Xcel Energy		null null, null United States	Electronic Service		No	M-25-139
100	Kim	Havey	kim.havey@minneapolismn.gov	City of Minneapolis		350 South 5th Street, Suite 315M Minneapolis	Electronic Service		No	M-25-139

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						MN, 55415 United States				
101	Todd	Headlee	theadlee@dvigridsolutions.com	Dominion Voltage, Inc.		701 E. Cary Street Richmond VA, 23219 United States	Electronic Service		No	M-25-139
102	Amber	Hedlund	amber.r.hedlund@xcelenergy.com	Northern States Power Company dba Xcel Energy-Elec		414 Nicollet Mall, 401-7 Minneapolis MN, 55401 United States	Electronic Service		No	M-25-139
103	Tiana	Heger	theher@mnpower.com	Minnesota Power		30 W. Superior Street Duluth MN, 55802 United States	Electronic Service		No	M-25-139
104	Adam	Heinen	aheinen@dakotaelectric.com	Dakota Electric Association		4300 220th St W Farmington MN, 55024 United States	Electronic Service		No	M-25-139
105	Annete	Henkel	mui@mnutilityinvestors.org	Minnesota Utility Investors		413 Wacouta Street #230 St.Paul MN, 55101 United States	Electronic Service		No	M-25-139
106	Jessy	Hennesy	jessy.hennesy@avantenergy.com	Avant Energy		220 S. Sixth St. Ste 1300 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-139
107	Mari	Hernandez	mari@irecusa.org	IREC		null null, null United States	Electronic Service		No	M-25-139
108	Katherine	Hinderlie	katherine.hinderlie@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	445 Minnesota St Suite 1400 St. Paul MN, 55101-2134 United States	Electronic Service		No	M-25-139
109	Joe	Hoffman	ja.hoffman@smpa.org	SMPA		500 First Ave SW Rochester MN, 55902-3303 United States	Electronic Service		No	M-25-139
110	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-25-139
111	Casey	Horan	choran@edf.org	Environmental Defense Fund		123 Mission St San Francisco CA, 94105 United States	Electronic Service		No	M-25-139
112	Ronald	Horman	rhorman@redwoodelectric.com	Redwood Electric Cooperative		60 Pine Street Clements MN, 56224 United States	Electronic Service		No	M-25-139
113	Frank	Hornstein	frank.hornstein@minneapolismn.gov	City of Minneapolis		350 South 5th Street Minneapolis MN, 55415 United States	Electronic Service		No	M-25-139
114	Samantha	Houston	shouston@ucs.org	Union of Concerned Scientists		1825 K St. NW Ste 800 Washington DC, 20006 United States	Electronic Service		No	M-25-139
115	Lori	Hoyum	lhoyum@mnpower.com	Minnesota Power		30 West Superior Street Duluth MN,	Electronic Service		No	M-25-139

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						55802 United States				
116	Jan	Hubbard	jan.hubbard@comcast.net			7730 Mississippi Lane Brooklyn Park MN, 55444 United States	Electronic Service		No	M-25- 139
117	Dean	Hunter	dean.hunter@state.mn.us		Minnesota Department of Labor & Industry	443 Lafayette Rd N St. Paul MN, 55155-4341 United States	Electronic Service		No	M-25- 139
118	Reuben	Hunter	bhunter@madisonei.com	Madison Energy Investments		8100 Boone Blvd Suite 430 Vienna VA, 22182 United States	Electronic Service		No	M-25- 139
119	Casey	Jacobson	cjacobson@bepc.com	Basin Electric Power Cooperative		1717 East Interstate Avenue Bismarck ND, 58501 United States	Electronic Service		No	M-25- 139
120	John S.	Jaffray	jjaffray@jjrpower.com	JJR Power		350 Highway 7 Suite 236 Excelsior MN, 55331 United States	Electronic Service		No	M-25- 139
121	Robert	Jagusch	rjagusch@mmua.org	MMUA		3025 Harbor Lane N Minneapolis MN, 55447 United States	Electronic Service		No	M-25- 139
122	Chris	Jarosch	chris@carrcreekelectricservice.com	Carr Creek Electric Service, LLC		209 Sommers Street North Hudson WI, 54016 United States	Electronic Service		No	M-25- 139
123	Alan	Jenkins	aj@jenkinsatlaw.com	Jenkins at Law		2950 Yellowtail Ave. Marathon FL, 33050 United States	Electronic Service		No	M-25- 139
124	Richard	Johnson	rickjohnson@cozen.com	Cozen O'Connor		150 S. 5th Street Suite 1200 Minneapolis MN, 55402 United States	Electronic Service		No	M-25- 139
125	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- 139
126	Nate	Jones	njones@hcpd.com	Heartland Consumers Power		PO Box 248 Madison SD, 57042 United States	Electronic Service		No	M-25- 139
127	Philip	Jones	phil@evtransportationalliance.org			1402 Third Ave Ste 1315 Seattle WA, 98101 United States	Electronic Service		No	M-25- 139
128	Julie	Jorgensen	julie@greenmark.us.com	Greenmark Solar		4630 Quebec Ave N New Hope MN, 55428- 4973 United States	Electronic Service		No	M-25- 139
129	Kevin	Joyce	kjoyce@tesla.com			null null, null United States	Electronic Service		No	M-25- 139
130	Mahmoud	Kabalan	mahmoud.kabalan@stthomas.edu	University of St Thomas		2115 Summit Ave. Mail OSS100	Electronic Service		No	M-25- 139

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						School of Engineering Saint Paul MN, 55105 United States				
131	Camille	Kadoch	ckadoch@raponline.org	Regulatory Assistance Project		50 State Street Suite 3 Montpelier VT, 05602 United States	Electronic Service		No	M-25-139
132	Cliff	Kaehler	cliff.kaehler@novelenergy.biz	Novel Energy Solutions LLC		4710 Blaylock Way Inver Grove Heights MN, 55076 United States	Electronic Service		No	M-25-139
133	Ralph	Kaehler	ralph.kaehler@gmail.com			13700 Co. Rd. 9 Eyota MN, 55934 United States	Electronic Service		No	M-25-139
134	Michael	Kampmeyer	mkampmeyer@a-e-group.com	AEG Group, LLC		260 Salem Church Road Sunfish Lake MN, 55118 United States	Electronic Service		No	M-25-139
135	Nick	Kaneski	nick.kaneski@enbridge.com	Enbridge Energy Company, Inc.		11 East Superior St Ste 125 Duluth MN, 55802 United States	Electronic Service		No	M-25-139
136	Jack	Kegel	jkegel@mmua.org	MMUA		3025 Harbor Lane N Suite 400 Plymouth MN, 55447-5142 United States	Electronic Service		No	M-25-139
137	William	Kenworthy	will@votesolar.org			1 South Dearborn St Ste 2000 Chicago IL, 60603 United States	Electronic Service		No	M-25-139
138	Samuel B.	Ketchum	sketchum@kennedy-graven.com	Kennedy & Graven, Chartered		150 S 5th St Ste 700 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-139
139	Tom	Key	tkey@epri.com	EPRI		942 Corridor Park Blvd Knoxville TN, 37932 United States	Electronic Service		No	M-25-139
140	Bobby	King	bking@solarunitedneighbors.org	Solar United Neighbors		3140 43rd Ave S Minneapolis MN, 55406 United States	Electronic Service		No	M-25-139
141	Jack	Kluempke	jack.kluempke@state.mn.us		Department of Commerce	85 7th Place East Suite 600 St. Paul MN, 55101 United States	Electronic Service		No	M-25-139
142	Aaron	Knoll	aknoll@greeneespel.com	Greene Espel PLLP		222 South Ninth Street Suite 2200 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-139
143	Steve	Kosbab	skosbab@meeker.coop	Meeker Cooperative Light and Power		1725 US Hwy 12 E Litchfield MN, 55355 United States	Electronic Service		No	M-25-139
144	Nathan	Kostiuk	nathan.c.kostiuk@xcelenergy.com	Xcel Energy		414 Nicollet Mall, 401-07	Electronic Service		No	M-25-139

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						Minneapolis MN, 55401 United States				
145	Brian	Krambeer	bkrambeer@mienergy.coop	MiEnergy Cooperative		PO Box 626 31110 Cooperative Way Rushford MN, 55971 United States	Electronic Service		No	M-25-139
146	Michael	Krause	michaelkrause61@yahoo.com			1200 Plymouth Avenue Minneapolis MN, 55411 United States	Electronic Service		No	M-25-139
147	Michael	Krikava	mkrikava@taftlaw.com	Taft Stettinius & Hollister LLP		2200 IDS Center 80 S 8th St Minneapolis MN, 55402 United States	Electronic Service		No	M-25-139
148	Corrina	Kumpe	ckumpe@mysunshare.com			null null, null United States	Electronic Service		No	M-25-139
149	Matthew	Lacey	mlacey@grenergy.com	Great River Energy		12300 Elm Creek Boulevard Maple Grove MN, 55369-4718 United States	Electronic Service		No	M-25-139
150	James D.	Larson	james.larson@avantenergy.com	Avant Energy Services		220 S 6th St Ste 1300 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-139
151	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-25-139
152	Burnell	Lauer	blauer.sundial@gmail.com	Sundial Solar		3209 W. 76th St #305 Edina MN, 55435 United States	Electronic Service		No	M-25-139
153	Dean	Leischow	dean@sunrisenrg.com	Sunrise Energy Ventures		315 Manitoba Ave Ste 200 Wayzata MN, 55391 United States	Electronic Service		No	M-25-139
154	Annie	Levenson Falk	annief@cupminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota Street, Suite W1360 St. Paul MN, 55101 United States	Electronic Service		No	M-25-139
155	Benjamin	Levine	blevine@mnpower.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	M-25-139
156	Becky	Li	bli@rmi.org			17 State St 25th floor unit 2500 New York NY, 10004 United States	Electronic Service		No	M-25-139
157	Amy	Liberkowski	amy.a.liberkowski@xcelenergy.com	Xcel Energy		414 Nicollet Mall 7th Floor Minneapolis MN, 55401-1993 United States	Electronic Service		No	M-25-139

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
158	Carl	Linville	clinville@raponline.org			50 State Street Suite #3 Montpelier VT, 05602 United States	Electronic Service		No	M-25-139
159	Phillip	Lipetsky	greenenergyproductsllc@gmail.com	Green Energy Products		PO Box 108 Springfield MN, 56087 United States	Electronic Service		No	M-25-139
160	Jody	Londo	jody.l.londo@xcelenergy.com	Xcel Energy		414 Nicillet Mall 7th Floor Minneapolis MN, 55401-1993 United States	Electronic Service		No	M-25-139
161	Susan	Ludwig	sludwig@mnpower.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	M-25-139
162	Brian	Lydic	brian@irecusa.org	Interstate Renewable Energy Council, Inc.		PO Box 1156 Latham NY, 12110-1156 United States	Electronic Service		No	M-25-139
163	Madeline	Lydon	madeline.k.lydon@xcelenergy.com	Xcel Energy		401 NICOLLET MALL Floor 7 Minneapolis MN, 55401 United States	Electronic Service		No	M-25-139
164	Richard	Macke	macker@powersystem.org	Power System Engineering, Inc.		10710 Town Square Dr NE Ste 201 Minneapolis MN, 55449 United States	Electronic Service		No	M-25-139
165	Alice	Madden	alice@communitypowermn.org	Community Power		2720 E 22nd St Minneapolis MN, 55406 United States	Electronic Service		No	M-25-139
166	Alex	Magerko	amagerko@epri.com	EPRI		942 Corridor Park Blvd Knoxville TN, 37932 United States	Electronic Service		No	M-25-139
167	Kavita	Maini	kmains@wi.rr.com	KM Energy Consulting, LLC		961 N Lost Woods Rd Oconomowoc WI, 53066 United States	Electronic Service		No	M-25-139
168	Tom	Mammen	thomas.j.mammen@xcelenergy.com	Xcel Energy		null null, null United States	Electronic Service		No	M-25-139
169	Discovery	Manager	discoverymanager@mnpower.com	Minnesota Power		30 W Superior St Duluth MN, 55802 United States	Electronic Service		No	M-25-139
170	Christine	Marquis	regulatory.records@xcelenergy.com	Xcel Energy		414 Nicollet Mall MN1180-07-MCA Minneapolis MN, 55401 United States	Electronic Service		No	M-25-139
171	Gregg	Mast	gmast@cleanenergyeconomymn.org	Clean Energy Economy Minnesota		4808 10th Avenue S Minneapolis MN, 55417 United States	Electronic Service		No	M-25-139
172	Erica	McConnell	emcconnell@elpc.org	Environmental Law & Policy Center		35 E. Wacker Drive, Suite 1600	Electronic Service		No	M-25-139

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						Chicago IL, 60601 United States				
173	Jess	McCullough	jmccullough@mnpower.com	Minnesota Power		30 W Superior St Duluth MN, 55802 United States	Electronic Service		No	M-25-139
174	Sara G	McGrane	smcgrane@felhaber.com	Felhaber Larson		220 S 6th St Ste 2200 Minneapolis MN, 55420 United States	Electronic Service		No	M-25-139
175	Natalie	McIntire	natalie.mcintire@gmail.com	Wind on the Wires		570 Asbury St Ste 201 Saint Paul MN, 55104-1850 United States	Electronic Service		No	M-25-139
176	Matthew	Melewski	matthew@theboutiquefirm.com	Nokomis Energy LLC & Ole Solar LLC		2639 Nicollet Ave Ste 200 Minneapolis MN, 55408 United States	Electronic Service		No	M-25-139
177	Thomas	Melone	thomas.melone@allcous.com	Minnesota Go Solar LLC		222 South 9th Street Suite 1600 Minneapolis MN, 55120 United States	Electronic Service		No	M-25-139
178	Michael	Menzel	mike.m@sagiliti.com	Sagiliti		23505 Smithtown Rd. Suite 280 Excelsior MN, 55331 United States	Electronic Service		No	M-25-139
179	Tim	Mergen	tmergen@meeker.coop	Meeker Cooperative Light And Power		1725 US Hwy 12 E. Suite 100 PO Box 68 Litchfield MN, 55355 United States	Electronic Service		No	M-25-139
180	Pontius	Mike	mpontius@mnpower.com			null null, null United States	Electronic Service		No	M-25-139
181	Brian	Millberg	fwengineering@comcast.net			695 Grand Ave #222 Saint Paul MN, 55105 United States	Electronic Service		No	M-25-139
182	Luther	Miller	luther.c.miller@xcelenergy.com	Xcel Energy		null null, null United States	Electronic Service		No	M-25-139
183	Marc	Miller	mmiller@soltage.com	Soltage, LLC		66 York Street, 5th Floor Jersey City NJ, 07302 United States	Electronic Service		No	M-25-139
184	Marcus	Mills	marcus@communitypowermn.org	Community Power		2720 E 22nd St Minneapolis MN, 55406 United States	Electronic Service		No	M-25-139
185	Darrick	Moe	darrick@mrea.org	Minnesota Rural Electric Association		11640 73rd Ave N Maple Grove MN, 55369 United States	Electronic Service		No	M-25-139
186	Dalene	Monsebroten	dalene.monsebroten@nmpagency.com	Northern Municipal Power Agency		123 2nd St W Thief River Falls MN, 56701 United States	Electronic Service		No	M-25-139

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
187	Brian	Monson	brian.t.monson@xcelenergy.com	Xcel Energy		null null, null United States	Electronic Service		No	M-25-139
188	Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP		33 South Sixth St Ste 4200 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-139
189	Susan	Mudd	smudd@elpc.org	Environmental Law and Policy Center		35 E. Wacker Drive, Suite 1600 Chicago IL, 60601 United States	Electronic Service		No	M-25-139
190	Pouya	Najmaie	najm0001@gmail.com	Cooperative Energy Futures		3416 16th Ave S Minneapolis MN, 55407 United States	Electronic Service		No	M-25-139
191	Alex	Nelson	anelson@dakotaelectric.com	Dakota Electric Association		4300 220nd St Farmington MN, 55024 United States	Electronic Service		No	M-25-139
192	Anthony	Nelson	amnelson@otpc.com	Ottertail Power		53233 Sunrise Ln Park Rapids MN, 56470 United States	Electronic Service		No	M-25-139
193	Ben	Nelson	benn@cmpasgroup.org	CMPMA		459 South Grove Street Blue Earth MN, 56013 United States	Electronic Service		No	M-25-139
194	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-25-139
195	Darin	Nelson	dnelson@minnetonkamn.gov	City of Minnetonka		14600 Minnetonka Blvd Minnetonka MN, 55345 United States	Electronic Service		No	M-25-139
196	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-25-139
197	Sephra	Ninow	sephra.ninow@energycenter.org	Center for Sustainable Energy		426 17th Street, Suite 700 Oakland CA, 94612 United States	Electronic Service		No	M-25-139
198	Michael	Noble	noble@fresh-energy.org	Fresh Energy		408 Saint Peter St Ste 350 Saint Paul MN, 55102 United States	Electronic Service		No	M-25-139
199	Rolf	Nordstrom	rnordstrom@gpisd.net	Great Plains Institute		2801 21ST AVE S STE 220 Minneapolis MN, 55407-1229 United States	Electronic Service		No	M-25-139
200	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	M-25-139

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
201	David	O'Brien	david.obrien@navigant.com	Navigant Consulting		77 South Bedford St Ste 400 Burlington MA, 01803 United States	Electronic Service		No	M-25-139
202	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-25-139
203	Patty	O'Keefe	patty.okeefe@sierraclub.org			2525 Emerson Ave S Apt 2 Minneapolis MN, 55405 United States	Electronic Service		No	M-25-139
204	Timothy	O'Leary	toleary@llec.coop	Lyon-Lincoln Electric Cooperative, Inc		P.O. Box 639 Tyler MN, 56178-0639 United States	Electronic Service		No	M-25-139
205	Jeff	O'Neill	jeff.oneill@ci.monticello.mn.us	City of Monticello		505 Walnut Street Suite 1 Monticello MN, 55362 United States	Electronic Service		No	M-25-139
206	Matthew	Olsen	molsen@otpc.com	Otter Tail Power Company		215 South Cascade Street Fergus Falls MN, 56537 United States	Electronic Service		No	M-25-139
207	Russell	Olson	rolson@hcpd.com	Heartland Consumers Power District		PO Box 248 Madison SD, 57042-0248 United States	Electronic Service		No	M-25-139
208	Wendi	Olson	wolson@otpc.com	Otter Tail Power Company		215 South Cascade Street Fergus Falls MN, 56537 United States	Electronic Service		No	M-25-139
209	Carol A.	Overland	overland@legalelectric.org	Legalelectric - Overland Law Office		1110 West Avenue Red Wing MN, 55066 United States	Electronic Service		No	M-25-139
210	Bethany	Owen	bowen@mnpower.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	M-25-139
211	Cezar	Panait	cezar.panait@state.mn.us		Public Utilities Commission	121 7th Place East Suite 350 St. Paul MN, 55101 United States	Electronic Service		No	M-25-139
212	Dan	Patry	dpatry@sunedison.com	SunEdison		600 Clipper Drive Belmont CA, 94002 United States	Electronic Service		No	M-25-139
213	Jeffrey C	Paulson	jeff.jcplaw@comcast.net	Paulson Law Office, Ltd.		4445 W 77th Street Suite 224 Edina MN, 55435 United States	Electronic Service		No	M-25-139
214	Dean	Pawlowski	dpawlowski@otpc.com	Otter Tail Power Company		PO Box 496 215 S. Cascade St. Fergus Falls MN, 56537-0496 United States	Electronic Service		No	M-25-139

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
215	Susan	Peirce	susan.peirce@state.mn.us		Department of Commerce	85 Seventh Place East St. Paul MN, 55101 United States	Electronic Service		No	M-25-139
216	Mary Beth	Peranteau	mperanteau@fredlaw.com	Fredrikson & Byron, P.A.		44 East Mifflin Street Suite 1000 Madison WI, 53703 United States	Electronic Service		No	M-25-139
217	Jennifer	Peterson	jjpeterson@mnpower.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	M-25-139
218	Wess	Pfaff	wes.pfaff@mrenergy.com			null null, null United States	Electronic Service		No	M-25-139
219	Ryan	Pierce	ryan.m.pierce@xcelenergy.com	Xcel Energy		null null, null United States	Electronic Service		No	M-25-139
220	Morgan	Pitz	morgan.pitz@us-solar.com	US Solar		100 N 6th St #410B Minneapolis MN, 55403 United States	Electronic Service		No	M-25-139
221	Hannah	Polikov	hpolikov@aee.net	Advanced Energy Economy Institute		1000 Vermont Ave, Third Floor Washington DC, 20005 United States	Electronic Service		No	M-25-139
222	Crystal	Pomerleau	crystal.r.pomerleau@xcelenergy.com	Xcel		null null, null United States	Electronic Service		No	M-25-139
223	Kristel	Porter	kristel@mnrenewablenow.org	MN Renewable Now		null null, null United States	Electronic Service		No	M-25-139
224	Paula	Prahl	paula.prahl@dominiuminc.com	Dominium		2905 Northwest Blvd Ste 150 Plymouth MN, 55441 United States	Electronic Service		No	M-25-139
225	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-25-139
226	Matt	Privratsky	matt@nokomisenergy.com	Nokomis Energy		2639 Nicollet Ave Suite 200 Minneapolis MN, 55408 United States	Electronic Service		No	M-25-139
227	Elizabeth	Psihos	elizabeth.psihos@idealenergies.com			null null, null United States	Electronic Service		No	M-25-139
228	Bridget	Rathsack	bridget.rathsack@burnsvillemn.gov	City of Burnsville, MN		100 Civic Center Parkway Burnsville MN, 55337 United States	Electronic Service		No	M-25-139
229	Peter	Reese	preese@sundialsolarenergy.com	Sundial Energy, LLC		3363 Republic Ave Saint Louis Park MN, 55426 United States	Electronic Service		No	M-25-139
230	Generic Notice	Regulatory	regulatory_filing_coordinators@otpc.com	Otter Tail Power Company		215 S. Cascade Street Fergus Falls	Electronic Service		No	M-25-139

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
245	Robert K.	Sahr	bsahr@eastriver.coop	East River Electric Power Cooperative		P.O. Box 227 Madison SD, 57042 United States	Electronic Service		No	M-25-139
246	Ian	SantosMeeker	ians@ips-solar.com	IPS Solar		null null, null United States	Electronic Service		No	M-25-139
247	Joseph L	Sathe	jsathe@kennedy-graven.com	Kennedy & Graven, Chartered		150 S 5th St Ste 700 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-139
248	Kenric	Scheevel	kjs@dairynet.com	Dairyland Power Cooperative		3200 East Ave S PO Box 817 La Crosse WI, 54602 United States	Electronic Service		No	M-25-139
249	Dean	Schiro	dean.e.schiro@xcelenergy.com	Xcel Energy		null null, null United States	Electronic Service		No	M-25-139
250	Jacob J.	Schlesinger	jschlesinger@keyesfox.com	Keyes & Fox LLP		1580 Lincoln St Ste 880 Denver CO, 80203 United States	Electronic Service		No	M-25-139
251	Jeff	Schoenecker	jschoenecker@dakotaelectric.com	Dakota Electric Association		4300 220th Street W Farmington MN, 55024 United States	Electronic Service		No	M-25-139
252	Peter	Scholtz	peter.scholtz@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	Suite 1400 445 Minnesota Street St. Paul MN, 55101-2131 United States	Electronic Service		No	M-25-139
253	Kay	Schraeder	kschraeder@minnkota.com	Minnkota Power		5301 32nd Ave S Grand Forks ND, 58201 United States	Electronic Service		No	M-25-139
254	Matthew	Schuerger	matthew.schuerger@state.mn.us		Public Utilities Commission	121 7th Place East Suite 350 St. Paul MN, 55101 United States	Electronic Service		No	M-25-139
255	Ronald J.	Schwartau	rschwartau@noblesce.com	Nobles Electric Cooperative		22636 U.S. Hwy. 59 Worthington MN, 56187 United States	Electronic Service		No	M-25-139
256	Rob	Scott Hovland	rob.scott-hovland@mrenergy.com	Missouri River Energy Services		3724 W Avera Dr PO Box 88920 Sioux Falls SD, 57109-8920 United States	Electronic Service		No	M-25-139
257	Emma	Searson	esearson@solarunitedneighbors.org	Solar United Neighbors		646 S Barrington Ave Apt 101 Los Angeles CA, 90049 United States	Electronic Service		No	M-25-139
258	Dean	Sedgwick	sedgwick@itascapower.com	Itasca Power Company		PO Box 455 Spring Lake MN, 56680 United States	Electronic Service		No	M-25-139
259	Maria	Seidler	maria.seidler@dom.com	Dominion Energy Technology		120 Tredegar Street Richmond VA, 23219 United States	Electronic Service		No	M-25-139

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
260	David	Shaffer	david.shaffer@novelenergy.biz	Novel Energy Solutions		2303 Wycliff St Ste 300 St. Paul MN, 55114 United States	Electronic Service		No	M-25-139
261	Patricia	Sharkey	psharkey@environmentallawcounsel.com	Midwest Cogeneration Association.		180 N LaSalle St Ste 3700 Chicago IL, 60601 United States	Electronic Service		No	M-25-139
262	Bria	Shea	bria.e.shea@xcelenergy.com	Xcel Energy		414 Nicollet Mall Minneapolis MN, 55401 United States	Electronic Service		No	M-25-139
263	Christopher L.	Sherman	csherman@sherman-associates.com	Solar Holdings LLC		233 Park Ave S Ste 201 Minneapolis MN, 55415 United States	Electronic Service		No	M-25-139
264	Doug	Shoemaker	dougs@charter.net	Minnesota Renewable Energy		2928 5th Ave S Minneapolis MN, 55408 United States	Electronic Service		No	M-25-139
265	Felicia	Skaggs	fskaggs@meeker.coop	Meeker Cooperative Light & Power		1725 US Highway 12 E Suite 100 Litchfield MN, 55355 United States	Electronic Service		No	M-25-139
266	Glen	Skarbakka	glen@s-pllc.com	Skarbakka PLLC		5411 Bartlett Blvd Mound MN, 55364 United States	Electronic Service		No	M-25-139
267	Anne	Smart	anne.smart@chargepoint.com	ChargePoint, Inc.		254 E Hacienda Ave Campbell CA, 95008 United States	Electronic Service		No	M-25-139
268	Joshua	Smith	joshua.smith@sierraclub.org			85 Second St FL 2 San Francisco CA, 94105 United States	Electronic Service		No	M-25-139
269	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-25-139
270	Trevor	Smith	trevor.smith@avantenergy.com	Avant Energy, Inc.		220 South Sixth Street Suite 1300 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-139
271	Rafi	Sohail	rafi.sohail@centerpointenergy.com	CenterPoint Energy		800 LaSalle Avenue P.O. Box 59038 Minneapolis MN, 55459-0038 United States	Electronic Service		No	M-25-139
272	Beth	Soholt	bsoholt@cleangridalliance.org	Clean Grid Alliance		570 Asbury Street Suite 201 St. Paul MN, 55104 United States	Electronic Service		No	M-25-139
273	Marcia	Solie	m.solie@bcrea.coop	Brown County Rural Electrical Association		24386 State Hwy. 4, PO Box 529 Sleepy Eye MN, 56085 United States	Electronic Service		No	M-25-139

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274	Braden	Solum	braden.solum@idealenergies.com	iDEAL Energies		5810 Nicollet Ave Minneapolis MN, 55419 United States	Electronic Service		No	M-25-139
275	Karl	Sonneman	karl17@hbci.com	Law Office of Karl W. Sonneman		111 Riverfront Suite 202 Winona MN, 55987 United States	Electronic Service		No	M-25-139
276	Brandon	Stamp	brandon.j.stamp@xcelenergy.com	Xcel Energy		401 Nicollet Mall Minneapolis MN, 55401 United States	Electronic Service		No	M-25-139
277	Sky	Stanfield	stanfield@smwlaw.com	Shute, Mihaly & Weinberger		396 Hayes Street San Francisco CA, 94102 United States	Electronic Service		No	M-25-139
278	Russ	Stark	russ.stark@ci.stpaul.mn.us	City of St. Paul		Mayor's Office 15 W. Kellogg Blvd., Suite 390 Saint Paul MN, 55102 United States	Electronic Service		No	M-25-139
279	Byron E.	Starns	byron.starns@stinson.com	STINSON LLP		50 S 6th St Ste 2600 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-139
280	Kristin	Stastny	kstastny@taftlaw.com	Taft Stettinius & Hollister LLP		2200 IDS Center 80 South 8th Street Minneapolis MN, 55402 United States	Electronic Service		No	M-25-139
281	Lindsey	Stegall	lindsey.stegall@evgo.com	EVgo Services, LLC		11835 W Olympic Blvd Ste 900E Los Angeles CA, 90064 United States	Electronic Service		No	M-25-139
282	Cary	Stephenson	cstephenson@otpc.com	Otter Tail Power Company		215 South Cascade Street Fergus Falls MN, 56537 United States	Electronic Service		No	M-25-139
283	Chad	Stevenson	chad.stevenson@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	445 Minnesota St. Suite 1400 St. Paul MN, 55101 United States	Electronic Service		No	M-25-139
284	Tammy	Sundbom	tsundbom@mnpower.com	Minnesota Power		null null, null United States	Electronic Service		No	M-25-139
285	Sherry	Swanson	sswanson@noblesce.com	Nobles Cooperative Electric		PO Box 58 Slayton MN, 56172 United States	Electronic Service		No	M-25-139
286	Boratha	Tan	btan@votesolar.org	Vote Solar		null null, null United States	Electronic Service		No	M-25-139
287	Bryant	Tauer	btauer@whe.org	Wright-Hennepin		6800 Electric Dr Rockford MN, 55373 United States	Electronic Service		No	M-25-139
288	Dean	Taylor	dtaylor@pluginamerica.org	Plug In America		6380 Wilshire Blvd, Suite 1000 Los Angeles CA, 90048 United States	Electronic Service		No	M-25-139

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289	Whitney	Terrill	whitney@mnipl.org	Minnesota Interfaith Power & Light		null null, null United States	Electronic Service		No	M-25-139
290	Daniel	Tikk	daniel.tikk@state.mn.us		Department of Commerce	85 7th Place East Suite 280 Saint Paul MN, 55101 United States	Electronic Service		No	M-25-139
291	Kate	Tohme	ktohme@newleafenergy.com	New Leaf Energy		null null, null United States	Electronic Service		No	M-25-139
292	Stuart	Tommerdahl	stommerdahl@otpc.com	Otter Tail Power Company		215 S Cascade St PO Box 496 Fergus Falls MN, 56537 United States	Electronic Service		No	M-25-139
293	Taige	Tople	taige.d.tople@xcelenergy.com	Northern States Power Company dba Xcel Energy-Elec		414 Nicollet Mall 401 7th Floor Minneapolis MN, 55401 United States	Electronic Service		No	M-25-139
294	Jason	Topp	jason.topp@lumen.com	Qwest Communications Company, LLC.		200 S 5th St Ste 2200 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-139
295	Emma Marshall	Torres	emarshall-torres@convergentep.com			null null, null United States	Electronic Service		No	M-25-139
296	Zack	Townsend	zachary.townsend@brookfieldrenewable.com	Brookfield Renewable		200 Liberty St FL 14 New York NY, 10281 United States	Electronic Service		No	M-25-139
297	Pat	Treseler	pat.jcplaw@comcast.net	Paulson Law Office LTD		4445 W 77th Street Suite 224 Edina MN, 55435 United States	Electronic Service		No	M-25-139
298	Jeff	Triplett	triplettj@powersystem.org	MREA		10710 Town Square Dr NW St 201 Minneapolis MN, 55449 United States	Electronic Service		No	M-25-139
299	Adam	Tromblay	atromblay@noblesce.com	Nobles Cooperative Electric		P.O. Box 58 Slayton MN, 56127-0058 United States	Electronic Service		No	M-25-139
300	Lise	Trudeau	lise.trudeau@state.mn.us		Department of Commerce	85 7th Place East Suite 500 Saint Paul MN, 55101 United States	Electronic Service		No	M-25-139
301	Alan	Urban	alan.m.urban@xcelenergy.com	Xcel Energy		null null, null United States	Electronic Service		No	M-25-139
302	Matt	Van Arkel	mvanarkel@newleafenergy.com			55 Technology Drive Suite 102 Lowell MA, 01851 United States	Electronic Service		No	M-25-139
303	Gary	Van Winkle	gvanwinkle@mylegalaid.org	Mid-Minnesota Legal Aid		111 N Fifth St Ste 100 Minneapolis MN, 55403 United States	Electronic Service		No	M-25-139
304	John	Vaughn	nik@rreal.org	Rural Renewable Energy Alliance		3963 8th Street SW Backus MN,	Electronic Service		No	M-25-139

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						55435 United States				
305	Ellen	Veazey	lveazey@solarunitedneighbors.org	Solar United Neighbors		1350 Connecticut Ave NW Ste 412 Washington DC, 20036 United States	Electronic Service		No	M-25-139
306	Sam	Villella	sdvillella@gmail.com			10534 Alamo Street NE Blaine MN, 55449 United States	Electronic Service		No	M-25-139
307	Curt	Volkman	curt@newenergy-advisors.com	Fresh Energy		408 St Peter St Saint Paul MN, 55102 United States	Electronic Service		No	M-25-139
308	Wendy	Vorasane	wendy.vorasane@idealenergies.com			null null, null United States	Electronic Service		No	M-25-139
309	Robert J.V.	Vose	rvose@kennedy-graven.com	Kennedy & Graven, Chartered		150 S 5th St Ste 700 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-139
310	Stacy	Wahlund	swahlund@otpc.com	Otter Tail Power Company		215 S. Cascade St Fergus Falls MN, 56537 United States	Electronic Service		No	M-25-139
311	Sarah	Walinga	swalinga@solarcity.com	Energy Freedom Coalition		3055 Clearview Way San Mateo MN, 94402 United States	Electronic Service		No	M-25-139
312	Kevin	Walker	kwalker@beaconinterfaith.org	Beacon Interfaith Housing Collaborative		null null, null United States	Electronic Service		No	M-25-139
313	Roger	Warehime	roger.warehime@owatonnautilities.com	Owatonna Municipal Public Utilities - Gas		208 S Walnut Ave PO BOX 800 Owatonna MN, 55060 United States	Electronic Service		No	M-25-139
314	Jenna	Warmuth	jwarmuth@mnpower.com	Minnesota Power		30 W Superior St Duluth MN, 55802-2093 United States	Electronic Service		No	M-25-139
315	Samantha	Weaver	samantha@communitysolaraccess.org	Coalition for Community Solar Access		1380 Monroe St. Washington DC DC, 20010 United States	Electronic Service		No	M-25-139
316	Elizabeth	Wefel	eawefel@flaherty-hood.com	Missouri River Energy Services		525 Park St Ste 470 Saint Paul MN, 55103 United States	Electronic Service		No	M-25-139
317	Sarah	Whebbe	swhebbe@mnseia.org	MnSEIA		445 Minnesota Street Suite 730 St. Paul MN, 55101 United States	Electronic Service		No	M-25-139
318	Joshua	Williams	joshua@highlandfleets.com	Highland Electric Fleets		200 Cummings Center Suite 273-D Beverly MA, 01915 United States	Electronic Service		No	M-25-139

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319	Laurie	Williams	laurie.williams@sierraclub.org	Sierra Club		Environmental Law Program 1536 Wynkoop St Ste 200 Denver CO, 80202 United States	Electronic Service		No	M-25-139
320	John	Williamson	john.williamson@state.mn.us	Minnesota Department of Labor and Industry		443 Lafayette Rd N St. Paul MN, 55155-4341 United States	Electronic Service		No	M-25-139
321	Anthony	Willingham	anthony.willingham@electrifyamerica.com	Electrify America		1950 Opportunity Way Suite 1500 Reston VA, 20190 United States	Electronic Service		No	M-25-139
322	Danielle	Winner	danielle.winner@state.mn.us		Department of Commerce	85 7th Place East Suite 500 Saint Paul MN, 55101 United States	Electronic Service		No	M-25-139
323	Heidi	Winter	hwinter@co.murray.mn.us	Murray County		2500 28th Street PO Box 57 Slayton MN, 56172 United States	Electronic Service		No	M-25-139
324	Robyn	Woeste	robynwoeste@alliantenergy.com	Interstate Power and Light Company		200 First St SE Cedar Rapids IA, 52401 United States	Electronic Service		No	M-25-139
325	Terry	Wolf	terry.wolf@mrenergy.com	Missouri River Energy Services		3724 W Avera Dr PO Box Sioux Falls SD, 57109-8920 United States	Electronic Service		No	M-25-139
326	Curtis	Zaun	curtis@cpzlaw.com			3254 Rice Street Little Canada MN, 55126 United States	Electronic Service		No	M-25-139
327	Brian	Zavesky	brianz@mrenergy.com	Missouri River Energy Services		3724 West Avera Drive P.O. Box 88920 Sioux Falls SD, 57108-8920 United States	Electronic Service		No	M-25-139
328	Christopher	Zibart	czibart@atcllc.com	American Transmission Company LLC		W234 N2000 Ridgeview Pkwy Court Waukesha WI, 53188-1022 United States	Electronic Service		No	M-25-139
329	Kurt	Zimmerman	kwz@ibew160.org	Local Union #160, IBEW		2909 Anthony Ln St Anthony Village MN, 55418-3238 United States	Electronic Service		No	M-25-139
330	Emily	Ziring	eziring@stlouispark.org	City of St. Louis Park		5005 Minnetonka Blvd St. Louis Park MN, 55416 United States	Electronic Service		No	M-25-139
331	Ari	Zwick	ari.zwick@state.mn.us		Department of Commerce	85 7th Place East Suite 280 Saint Paul	Electronic Service		No	M-25-139

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						MN, 55101 United States				