



414 Nicollet Mall
Minneapolis, MN 55401

October 28, 2025

—Via Electronic Filing—

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

RE: COMMENTS
IN THE MATTER OF AN INVESTIGATION INTO IMPLEMENTING CHANGES TO
THE RENEWABLE ENERGY STANDARD AND THE NEWLY CREATED CARBON
FREE STANDARD UNDER MINN. STAT. § 216B.1691
DOCKET NO. E999/CI-23-151

Dear Ms. Bergman:

Northern States Power Company, doing business as Xcel Energy, submits the enclosed Comment to the Minnesota Public Utilities Commission responding to the September 12, 2025 Notice of Comment Period regarding implementation of the Carbon Free Standard (CFS).

We have electronically filed this document with the Minnesota Public Utilities Commission, and copies have been served on the parties on the attached service list. Please contact Karin Haas at or karin.haas@xcelenergy.com or me at jody.l.londo@xcelenergy.com if you have any questions regarding this filing.

Sincerely,

/s/

JODY L. LONDO
DIRECTOR, REGULATORY & STRATEGIC ANALYSIS

Enclosures
cc: Service List

STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION

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

IN THE MATTER OF AN INVESTIGATION
INTO IMPLEMENTING CHANGES TO THE
RENEWABLE ENERGY STANDARD AND
THE NEWLY CREATED CARBON FREE
STANDARD UNDER MINN. STAT. §
216B.1691

DOCKET NO. E999/CI-23-151

COMMENTS

INTRODUCTION

Northern States Power Company, doing business as Xcel Energy, submits these Comments to the Minnesota Public Utilities Commission in response to the Commission’s September 12, 2025 Notice of Comment Period (Notice) seeking comments on two topics:

- A. In light of the statutory changes made by H.F. No. 7, are any additional clarifications necessary regarding the off-ramp process outlined in the Commission’s March 19, 2010 Order in Docket No. E-999/CI-03-869?
- B. Are there other issues or concerns related to this matter?

The Commission’s October 17, 2025 Notice of Comment Period (October Expanded Notice) on Compliance Filings expanded the topics open for comment. In the October Expanded Notice, Staff requests that in this comment period, parties discuss the issue of extended credit duration for certain small wind resources or other projects. The Company will address these topics in its November 18, 2025 Reply Comments.

As stated in the Notice, Minn. Stat. § 216B.1691, subd. 2b provides for modification or delay of the Carbon-Free Standard (CFS). The Commission’s March 19, 2010 Order in Docket No. E999/CI-03-869 (the “2010 Order,” provided in full as

Attachment A) was the most recent Order addressing this topic as it applied to the Renewable Energy Standard (RES) – the prevailing standard at the time.

We believe that the 2010 Order provides a firm foundation for the Commission to determine if a modification to or delay in implementation of a standard obligation is in the public interest, and that the 2010 Order allows for needed flexibility. As discussed in these Comments, minor clarifications to the 2010 Order coupled with Minn. Stat. § 216B.1691, subd. 2b will provide utilities with additional direction and process certainty regarding CFS modification or delay. The 2010 Order acknowledges the need for flexibility in the process; that need for flexibility remains. The CFS is a new, nation-leading policy, and maintaining procedural flexibility within the bounds of the statute will enable the necessary Commission oversight while facilitating the accomplishment of Minnesota’s policy objectives.

We provide the full 2010 Order as Attachment A to these comments and denote the parts of the Order that we consider relevant to this comment period. Should the Commission wish to model the 2010 Order Points in future Orders, in Attachment B we offer minor redlines to those parts of the 2010 Order that we believe reflect Minn. Stat. § 216B.1691 as it now stands.

COMMENTS

At the outset, we offer two clarifications regarding CFS modification or delay and the 2010 Order.

1. We understand “off-ramp” to mean “modification or delay of the implementation of a standard obligation under the CFS” as allowed by Minn. Stat. § 216B.1691, subd. 2b (hereafter “the CFS Modification Provision”). We further clarify that the Company considers a Commission-approved modification or delay equal to compliance with the CFS, since the Company would either be in compliance with a Commission-modified standard, or with the standard in statute but with a delayed compliance year.
2. We note that the 2010 Order includes important information regarding the modification process, but it also includes other information and topics that are not relevant to the topics requested in the Notice. The 2010 Order was issued after a proceeding in 2009-2010 focused on measuring compliance with the RES, after the transition from the Renewable Energy Objectives to the RES. The proceeding covered topics including compliance, penalties, and how the Commission should exercise its authority to grant modifications or delays of utility obligations. In alignment with the Notice, the Company clarifies that these Comments are limited to parts of the 2010 Order that it considers relevant to the delay of or modification

to standard obligations, as follows:

- Section IV – Petitions to Modify or Delay [RES] Obligations, 2010 Order at pp. 7-8.
- Section V – Tracking Rate Impacts and Reliability Impacts, 2010 Order at pp. 8-10.
- Order Point Nos. 4 through 9.

Finally, we note that the Commission may wish to modify or mirror other parts of the 2010 Order to align with recent updates to Minn. Stat. § 216B.1691.

I. CLARIFICATIONS TO PROCESS IN 2010 ORDER

The 2010 Order (1) covers considerations for petitions to modify or delay standard obligations, and (2) concludes that no separate rate or reliability reporting is necessary to meet the statutory grounds for delaying a standard obligation. We address each topic below and respectfully recommend clarifications to the 2010 Order.

A. Petitions to Modify or Delay Standard Obligations

We recommend the Commission continue to allow for procedural and content flexibility in petitions to modify or delay CFS implementation akin to the 2010 Order. We address petition contents and procedural considerations in turn below.

1. Petition Contents

As noted in the 2010 Order, “the statute lists substantive considerations the Commission must weigh in acting on petitions to modify or delay” standard obligations.¹ The statutory changes made by H.F. No. 7 expand these considerations to include environmental costs, impacts on environmental justice areas, and beneficial electrification. H.F. No. 7 also expands considerations regarding transmission capacity constraints. The statute does not bar the Commission from considering other factors in addition to those listed in the statute.

Order Point No. 5 of the 2010 Order provides a few requirements regarding contents of a petition to modify or delay standard obligations:

5. Any petition to modify or delay a Renewable Energy Standard shall include the following information: (a) a discussion of the reasons for concluding that compliance cannot be achieved by buying Renewable Energy Credits; (b) a plan for future

¹ 2010 Order at p. 7.

compliance, as required under Minn. Stat. § 216B.1691, subd. 2b (c); and (c) the time frame within which the petitioner requests Commission action.

The 2010 Order Point No. 5(b) and (c) requirements noted above are consistent with the H.F. No. 7 changes to the CFS Modification Provision.² Order Point No. 5(a) requires discussion of the reasons compliance cannot be achieved by purchasing Renewable Energy Credits (RECs). Minn. Stat. § 216B.1691, subd. 4(b) allows electric utilities to utilize RECs to satisfy the CFS, so this requirement remains relevant for CFS modification petitions; the Commission could also consider expanding this requirement to include reference to Alternative Energy Credits (AECs) or equivalent Environmental Attribute Credits (EACs), which can also be used to demonstrate compliance with the CFS.³ Attachment B to these comments reflects this addition.

In the Company's view, the H.F. No. 7 changes do not necessitate any additional direct clarifications regarding petition contents, other than the addition of AECs and EACs, as noted above. The robust considerations explicit in the CFS Modification Provision combined with the additional details in the 2010 Order provide sufficient clarity regarding petition contents; together, they also maintain important flexibility for the Commission to consider many relevant factors beyond the considerations explicit in the CFS Modification Provision.

2. *Procedural Considerations*

Order Point Nos. 4 and 6 of the 2010 Order – with one exception shown in redline below – remain relevant to the CFS, and would provide important clarification to the CFS that can help enable transparency and expediency should unforeseen or emergent circumstances arise:

4. The Commission clarifies that a petition to modify or delay a Renewable Energy Standard may be filed at any time.
6. Petitions to modify or delay any Renewable Energy Standard shall comply with the service and filing requirements of Minnesota Rules 7829.1300 and, at least initially, follow the procedural track set forth in Minnesota Rules 7829.1400.

Following the service and filing requirements and procedural process set forth in 2010 Order Point No. 6 also remains appropriate for the CFS. Considering the length of time that has passed since the 2010 Order, and the fact that the Commission can

² Attachment B, the Company's recommended redlines to the 2010 Order, reflects the change to the numbering within the Modification Provision. What was Minn. Stat. § 216B.1691, subd. 2b(c) at the time of the 2010 Order is now Minn. Stat. § 216B.1691, subd. 2b(e).

³ ORDER ON CARBON-FREE STANDARD—CLARIFYING USE OF CREDITS, NET MARKET PURCHASES, AND REPORTING, Docket No. E999/CI-23-151 (September 16, 2025), at Order Point No. 1.

choose to update its Orders by issuing new Orders,⁴ we respectfully suggest the qualifier in Order Point No. 6 – “at least initially” – is unnecessary and potentially confusing and need not be included in a future Order.

The 2010 Order does not specify the venue or docket in which modification petitions should be filed. Minn. Stat. § 216B.1691, subd. 2c states that the Commission may modify or delay implementation as part of an integrated resource plan (IRP) proceeding but does not limit this action to IRP proceedings. The 2010 Order also acknowledges that “that resource plan proceedings generally offer the best opportunity to examine the utility-specific rate impact of meeting the” standard.⁵ We agree; in addition, the resource planning process provides the best opportunity to examine other impacts related to the CFS.

B. Rate and Reliability Impacts of CFS

The 2010 Order highlights two of the statutory grounds for modifying or delaying a standard obligation: rate impact and system reliability.⁶ The 2010 Order discusses the existing venues for reporting and evaluating rate and reliability impacts; such information would be needed to meet the statutory grounds for modification or delay of the standard. The Commission concluded – as Order Point No. 7 – that existing proceedings and methods – i.e., resource plans, transmission plans, reliability reporting, rate proceedings – are sufficient for tracking the rate and reliability impacts of the RES. Order Point Nos. 8 and 9 of the 2010 Order clarify the types of rate and cost information the Commission favors, and what information intervenors may request in a resource plan proceeding.

Order Points Nos. 7-9 read:

7. The Commission clarifies that it will use the proceedings and methods discussed in section V of this order to track the rate and reliability effects of the Renewable Energy Objectives and Standards. The Commission will accept voluntary filings on the rate impact of the Renewable Energy Objectives and Standards in the biennial compliance reports filed by utilities not required to file resource plans.
8. The Commission clarifies that it favors forward-looking, long-term cost information when analyzing the rate impacts of the Renewable Energy Objectives and Standards but will not preclude other types of cost information from being presented by the parties.
9. The Commission clarifies that intervenors in a resource plan proceeding who

⁴ Minn. Stat. § 216B.25.

⁵ 2010 Order at p. 9.

⁶ 2010 Order at p. 8.

request information related to the rate impact of future compliance with the Renewable Energy Standards are making a reasonable request for information under Minn. Rules, part 7843.0300, subp. 8, and that utilities must promptly respond.

The Company respectfully suggests that Order Point Nos. 7 and 8 may no longer be *necessary* regarding the issue of modification or delay of a standard obligation, but may provide helpful clarification of the Commission’s expectations for the method and form of information it expects in petitions seeking a modification or delay of the CFS. As discussed below, we believe Order Point No. 9 is no longer needed. However, the Commission may determine that they provide helpful clarification of its expectations.

Order Point No. 7 – As discussed in Part A above, Minn. Stat. § 216B.1691, subd. 2c states that the Commission may modify or delay implementation as part of an integrated resource plan (IRP) proceeding, but does not limit this action to IRP proceedings. Order Point No. 7 provides procedural specificity, if that is something the Commission prefers.

Order Point No. 8 – The 2010 Order predates the enactment of Minn. Stat. § 216B.1691, subd. 2e, which now requires utilities to report on “an estimation of the rate impact of activities of the electric utility necessary to comply with” the CFS;⁷ it does not, however, specify a preference for forward-looking, long-term information. If the present Commission maintains that preference, it may want to provide the same or similar specificity as is contained in Order Point No. 8 of the 2010 Order.

Order Point No. 9 – Order Point No. 9 directs utilities to respond to information requests related to RES rate impacts. As noted above, the 2010 Order predates Minn. Stat. § 216B.1691, subd. 2e, which now expressly codifies the requirement for utilities to estimate the rate impact of compliance. While we believe that Order Point No. 9 is no longer as necessary, the Commission may determine that Order Point No. 9 provides clarification of its expectations.

For these reasons, the Commission need not include Order Point Nos. 7, 8, or 9 – or modifications thereof – in future CFS Orders, but it may find the clarifications helpful. If the Commission chooses to include these Order Points in future Orders for the CFS, reference to the CFS would be necessary.

⁷ 2011 Session Laws, Chapter 97—S.F. No. 1197. Available at <https://www.revisor.mn.gov/laws/2011/0/97/#laws.0.14.0>.

CONCLUSION

The Company appreciates the opportunity to provide these Comments and suggests minor clarifications to the 2010 Order. These combined with the robust requirements laid out in Minn. Stat. § 216B.1691, subd. 2b will provide the necessary clarity regarding CFS modification or delay, while maintaining important flexibility for the Commission and CFS-obligated utilities as we work to meet Minnesota's ambitious goals. We do not believe there are any other issues or concerns related to this matter. In Reply Comments, the Company will address the topics in the October 17, 2025 Notice of Comment Period on compliance filings.

Dated: October 28, 2025

Northern States Power Company

Red box denotes portions of the Order relevant to Fourth
Comment Period in Docket No. E999/CI-23-151

BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

David C. Boyd	Chair
J. Dennis O'Brien	Commissioner
Thomas Pugh	Commissioner
Phyllis A. Reha	Commissioner
Betsy Wergin	Commissioner

In the Matter of Detailing Criteria and Standards
for Measuring an Electric Utility's Good Faith
Efforts in Meeting the Renewable Energy
Objectives Under Minn. Stat. § 216B.1691

ISSUE DATE: March 19, 2010

DOCKET NO. E-999/CI-03-869

ORDER CLARIFYING CRITERIA AND
STANDARDS FOR DETERMINING
COMPLIANCE UNDER MINN. STAT.
§ 216B.1691

PROCEDURAL HISTORY

I. The Renewable Energy Standards

Under Minn. Stat. § 216B.1691, all Minnesota investor-owned electric utilities, generation and transmission cooperatives, municipal power agencies, and power districts (hereinafter, "utilities") must generate or procure specific percentages of their total retail sales using eligible renewable technologies by specific year-end deadlines. These requirements, called the Renewable Energy Standards, are different for nuclear and non-nuclear utilities and are set forth below:¹

<i>Non-Nuclear Utilities</i>		<i>Nuclear Utility</i>	
2012	12%	2010	15%
2016	17%	2012	18%
2020	20%	2016	25%
2025	25%	2020	30%

The statute directs and authorizes the Commission to oversee utilities' compliance with the Renewable Energy Standards. It requires utilities to report on compliance efforts at least every two years and directs the Commission to regularly investigate each utility's compliance. It authorizes the Commission to enter orders requiring specific performance by non-complying utilities and to assess financial penalties if those orders are not obeyed.

¹ The state has only one nuclear utility, Xcel Energy.

The statute also directs the Commission to establish a program and protocols for trading renewable energy credits and to require all utilities to participate.² The Commission has implemented this directive by requiring utilities to use the Midwest Renewable Energy Tracking System (M-RETS) to record and track – in the form of Renewable Energy Credits issued by M-RETS – all renewable generation and purchased power supplies they propose to count toward compliance with the Renewable Energy Standards.³

Finally, the statute grants the Commission the authority to modify or delay any utility obligation under the Renewable Energy Standards if it is in the public interest to do so.⁴

II. This Proceeding

Implementing the Renewable Energy Standards – and the Renewable Energy Objectives, which preceded them – has been and remains a complex, iterative process. The Commission has issued a series of orders in this docket on implementation issues, detailing the criteria and standards it will use to determine utilities' compliance with the statute. Each time, the Commission has first requested comments from utilities and other stakeholders to help develop the issues as fully as possible.

On September 2, 2009, the Commission again issued a notice requesting comments on implementation issues. The notice focused on how to measure compliance with the higher renewable generation requirements imposed by the transition from the Renewable Energy Objectives to the Renewable Energy Standards. It also sought comment on how the Commission should exercise its authority to require compliance, assess penalties, and grant modifications or delays of utility obligations.

The following persons and organizations filed comments in response to the notice:

- Office of Energy Security of the Minnesota Department of Commerce (OES)
- Northern States Power Company d/b/a Xcel Energy
- Great River Energy
- Dairyland Power Cooperative
- Otter Tail Power Company
- Minnesota Power
- East River Electric Power Cooperative, Inc.
- Interstate Power and Light Company
- Missouri River Energy Services
- Southern Minnesota Municipal Power Agency
- Central Minnesota Municipal Power Agency

² Minn. Stat. § 216B.1691, subd. 4.

³ See orders dated October 9, 2007 and December 18, 2007 in *In the Matter of a Commission Investigation into a Multi-State Tracking and Trading Systems for Renewable Energy Credits*, Docket No. E-999/CI-04-1616.

⁴ Minn. Stat. § 216B.1691, subd. 2b.

- Heartland Consumers Power District
- Minnesota Rural Electric Association
- Minnkota Power Cooperative, Inc.
- Minnesota Municipal Utilities Association
- Excelsior Energy Inc.
- Minnesota Chamber of Commerce
- ArcelorMittal USA; Blandin Paper Company; Boise, Inc.; Enbridge Energy Limited Partnership; Gerdau Ameristeel Corporation; Hibbing Taconite Company; Marathon Petroleum Company, LLC; NewPage Corporation; Sappi Cloquet, LLC; United States Steel Corporation; and United Taconite, LLC; filing jointly as “the Large Industrial Group”

On February 4, 2010, the case came before the Commission.

FINDINGS AND CONCLUSIONS

I. The Issues

The issues on which the Commission sought comment, and the issues raised in stakeholder comments, are summarized below:

- 1) How should utilities account for power received from the Western Area Power Administration in calculating their total retail sales?
- 2) How should the Commission measure compliance for the compliance years listed in the statute and for the years between those compliance years?
- 3) Should the Commission set procedural requirements for petitions to modify or delay utility obligations under the Renewable Energy Standards? Should the Commission clarify whether persons other than utilities may file those petitions?
- 4) Should the Commission set reporting requirements or establish a framework for evaluating how compliance with the Renewable Energy Standards affects rates or system reliability, two factors that can justify modifying or delaying utility obligations under the Renewable Energy Standards obligations?
- 5) Should the Commission provide guidance on the factors it will take into account in considering enforcement or penalty proceedings for non-compliance with the Renewable Energy Standards?

These issues will be addressed in turn.

II. Accounting for WAPA Power

A. Introduction

The statute requires utilities to generate or procure specific percentages of their total retail sales – including wholesale sales to distribution utilities, defined as retail sales under Minn. Stat. § 216B.1694, subd. 1 (c) – from “eligible energy technologies.” Eligible energy technologies do not include large-scale hydroelectric facilities, just hydroelectric facilities with a capacity under 100 megawatts.⁵

Excluding large hydroelectric facilities from eligible energy technologies essentially excludes from counting toward the Renewable Energy Standards all supplies from the Western Area Power Administration (WAPA), a federal power marketing administration that provides substantial amounts of hydroelectric power from large hydro facilities to municipal utilities, rural electric cooperatives, and at least five Native American tribes within the state. In most cases these WAPA supplies have no impact on anyone’s Renewable Energy Standard obligations, since the entities receiving WAPA power – municipal utilities, rural electric cooperatives, and native American tribes – are not “utilities” under the statute and do not have Renewable Energy Standard obligations.⁶

There are a handful of cases, however, in which WAPA-eligible entities have pooled their WAPA allocations, have merged those allocations with the other power supplies of their utility providers – who *do* have Renewable Energy Standard obligations – and now purchase WAPA power directly from their providers as part of larger power purchases. From the comments made in this docket, this appears to be true for some members of two generation and transmission cooperatives, East River Electric Power Cooperative and L & O Power Cooperative, and for five Native American tribes who take service from Otter Tail Power Company.⁷

B. Positions of the Parties

The Office of Energy Security (OES) recommended that the Commission clarify that when WAPA allocations are aggregated and the power sold to members or customers by utilities with Renewable Energy Standard obligations, the WAPA kilowatt-hours are properly included in the total retail sales on which the utilities’ Renewable Energy Standard obligations are based.

East River Electric Power Cooperative and Otter Tail Power Company, supported by the Minnesota Municipal Utilities Association, the Minnesota Rural Electric Association, and several generation and transmission cooperatives, opposed the OES’s position. They emphasized that the legislative stakeholder coalition that had supported passage of the Renewable Energy Standards had agreed that WAPA allocations would be excluded from the retail sales on which obligations arising under the Standards would be based.

⁵ Minn. Stat. § 216B.1691, subd. 1 (a)

⁶ Minn. Stat. § 216B.1691, subd. 1 (b).

⁷ Initially, the Office of Energy Security thought this was also true of some or all of the members of Great River Energy, but Great River has since clarified that it provides only transmission and billing services to its WAPA-eligible distribution cooperatives, who continue to hold their WAPA allocations individually.

They also argued that it was unfair or discriminatory to treat aggregated WAPA power differently from WAPA power directly sold to WAPA-eligible entities. And they argued that WAPA power should be excluded from total retail sales as a matter of policy, since WAPA power was socially beneficial, no-carbon or low-carbon, and essentially renewable.

C. Commission Action

The Commission concurs with the OES that the plain meaning of the statute requires the inclusion of WAPA power in the total retail sales of utilities who aggregate and sell WAPA power to members or customers. The statutory definition of “total retail electric sales” reads as follows:

(c) "Total retail electric sales" means the kilowatt-hours of electricity sold in a year by an electric utility to retail customers of the electric utility or to a distribution utility for distribution to the retail customers of the distribution utility.

Minn. Stat. § 216B.1691, subd. 1 (c)

This definition does not exclude certain kilowatt-hours on the basis of where they originate, how they are generated, or any other basis – if kilowatt-hours are sold by a utility to retail customers or to a distribution utility for distribution to retail customers, those kilowatt-hours are part of the utility’s “total retail electric sales.”

The words of the statute are clear and free from all ambiguity. Under Minn. Stat. § 645.16, the Commission therefore lacks the authority to interpret the statutory definition to conform with any presumed legislative intent or to reflect the Commission’s or anyone else’s understanding of sound public policy:

When the words of a law in their application to an existing situation are clear and free from all ambiguity, the letter of the law shall not be disregarded under the pretext of pursuing the spirit.

Finally, the OES reported that East River Electric Power Cooperative, L & O Power Cooperative, and Otter Tail Power Company may have excluded WAPA sales from the total retail electric sales reported for purposes of demonstrating their compliance with the Renewable Energy Objectives and Standards in the 2008 docket the Commission opened for that purpose.⁸ The Commission will require supplemental filings from these three utilities to ensure adequate baseline compliance information going forward.

⁸ *In the Matter of Commission Consideration and Determination on Compliance with Renewable Energy Obligations and Renewable Energy Standards*, Docket No. E-999/M-08-1163.

III. Compliance Metrics for Compliance Years Listed in Statute and for Years Between Listed Years

The statute requires utilities to generate or procure the following percentages of their total retail sales using eligible renewable technologies by the ends of the years listed:

<i>Non-Nuclear Utilities</i>		<i>Nuclear Utility</i>	
2012	12%	2010	15%
2016	17%	2012	18%
2020	20%	2016	25%
2025	25%	2020	30%

In an earlier order in this docket, the Commission clarified how it would measure compliance with the statutory target dates and renewable-energy percentages required under the Renewable Energy Objectives, which preceded the Renewable Energy Standards.⁹ In that order the Commission clarified that compliance meant acquiring the specified percentages of renewable energy by the specified dates *and maintaining those percentages* during the years leading up to the next mandated percentage increase.¹⁰ The September notice requested comment on whether the Commission should continue this approach to measuring compliance with the new Renewable Energy Standards.

The commenting parties generally concurred that the reasoning in the Commission’s order on the Renewable Energy Objectives was equally applicable here and that the statutory performance dates properly function as ratchets steadily increasing utilities’ renewable energy obligations. The Commission agrees. It would defeat the clear meaning of the statute to permit renewable energy percentages to drop between listed compliance years. Similarly, the Commission concurs with the parties that the listed renewable-energy percentages must be met (unless extended or modified by the Commission) by the last day of the listed years.

Further, the parties are correct that the non-nuclear utilities must meet (or demonstrate good faith efforts to meet) the Renewable Energy Objectives’ final target renewable energy percentage of 7% in 2011. (Xcel, the nuclear utility, is subject to the higher percentages mandated in the Renewable Energy Standards before that date.) And all utilities, nuclear and non-nuclear, must use the procedures outlined in the December 3, 2008 order in this docket to demonstrate and verify compliance.

In short, for the non-nuclear utilities, the mandated percentages of total retail sales to be generated or procured using eligible renewable technologies are as set forth below. Once set, each percentage remains in effect for all subsequent years, until the next mandated percentage goes into effect.

⁹ Third Order Detailing Criteria and Standards for Determining Compliance under Minn. Stat. § 216B.1691 and Setting Procedures for Retiring Renewable Energy Credits, this docket, December 3, 2008.

¹⁰ Since the Renewable Energy Objectives are just that – objectives – compliance can be demonstrated on the basis of good faith efforts as well as actual performance. While the Renewable Energy Standards do not permit good faith efforts to substitute for performance, they do permit the Commission to modify or delay any Renewable Energy Standard obligation when modification or delay is in the public interest.

2011	7%
2012-2015	12%
2016-2019	17%
2020-2024	20%
2025	25%

IV. Petitions to Modify or Delay Renewable Energy Standard Obligations

The statute lists substantive considerations the Commission must weigh in acting on petitions to modify or delay Renewable Energy Standard obligations, requires petitioning utilities to file plans for achieving eventual compliance, and identifies resource plan proceedings as one appropriate procedural vehicle for these petitions.¹¹ The September 2009 notice asked what further procedural guidance would be helpful at this point.

The commenting parties recommended procedural flexibility, with content requirements and procedural details addressed on a case-by-case basis as the Commission and stakeholders gain experience under the new Standards. Stakeholders disagreed on whether rate cases were likely to be good procedural vehicles, but agreed it was important to permit stand-alone petitions to delay or modify Renewable Energy Standard obligations at any time. The OES also recommended that any delay/modification petition explain why the petitioner believed that purchasing Renewable Energy Credits was not a viable compliance option.

The Commission concurs with the commenting parties that it is too early to provide detailed procedural guidance on delay/modification petitions. The Renewable Energy Standards do not go into effect for non-nuclear utilities until 2012, and no serious compliance issues have yet arisen. Still, meeting the Standards is a long-term project the utilities have already begun, and it is reasonable to provide some basic procedural guidance on how to deal with compliance obstacles.

The Commission concurs with the parties that petitions to modify or delay a Renewable Energy Standard obligation may be filed at any time, independent of any resource plan proceeding that may be pending or on the horizon. Petitions should comply with the statutory requirement to include a plan for future compliance¹² and should include an explanation as to why purchasing Renewable Energy Credits would not be a viable alternative to modifying or delaying a Renewable Energy Standard obligation.

The procedural template for delay/modification petitions, at least at the outset of the proceeding, will be parts 7829.1300 and 7829.1400 of the Commission's Rules of Practice and Procedure. Those provisions describe the service, filing, and content requirements for "miscellaneous tariff filings," the rules' default classification for filings whose procedural treatment is not separately addressed.¹³

¹¹ Minn. Stat. § 216B.1691, subs. 2b and 2c.

¹² Minn. Stat. § 216B.1691, subd. 2b (c).

¹³ Minn. Rules 7829.0100, subp. 11.

Finally, delay/modification petitions should state the time frame within which the petitioner seeks a final decision. While these time frames cannot always be met, consistent with the requirements of due process and informed decision-making, it is important for the Commission to know in advance of any time constraints perceived by the petitioning party.

V. Tracking Rate Impacts and Reliability Impacts

A. Introduction

Under Minn. Stat. § 216B.1691, subd. 2b (a), two of the statutory grounds for modifying or delaying a Renewable Energy Standard obligation are

- (1) the impact of implementing the standard on its customers' utility costs, including the economic and competitive pressure on the utility's customers; and
- (2) the effects of implementing the standard on the reliability of the electric system.

In both cases, the Commission may delay or modify an obligation only if it finds that requiring compliance “would cause significant rate impact, requires significant measures to address reliability, or raises significant technical issues.”¹⁴

The September 2009 notice sought comments on whether the Commission should set reporting requirements or establish a framework for evaluating how compliance with the Renewable Energy Standards might affect rates or system reliability.

B. Parties' Comments

1. Rates

No commenting party claimed that the Renewable Energy Objectives or Standards had adversely affected rates so far, and at least two utilities, Xcel and Otter Tail, maintained that their investments in eligible renewable technologies had reduced ratepayer costs.

The commenting parties generally agreed that resource plan proceedings provide the most comprehensive opportunity currently available for examining the rate impacts of the Renewable Energy Standards.¹⁵ They noted, however, that five of the sixteen utilities subject to the Renewable Energy Standards are not required to file resource plans.

¹⁴ Minn. Stat. § 216B.1691, subd. 2b (a).

¹⁵ Under Minn. Stat. § 216B.2422, entities capable of generating at least 100,000 kilowatts of electric power and serving, either directly or indirectly, the needs of at least 10,000 Minnesota retail customers must file periodic, comprehensive resource plans, detailing the projected future needs of their service areas and their plans for meeting those needs.

The utilities pointed out that the Commission continually monitors the rate impact of their resource choices through many different types of proceedings – e.g., rate cases, resource plans, certificate of need applications, purchased power contract approval proceedings, renewable energy and transmission rider approval requests. They stated their willingness to provide forward-looking cost comparisons between different resource choices, including, when relevant, resource choices that could require delay or modification of their Renewable Energy Standard obligations. They cautioned against being required to provide backward-looking data, however, saying that attempting to reconstruct hypothetical past costs quickly becomes speculative and onerous.

The OES concurred with the utilities that forward-looking, long-term data was the most reliable for gauging the rate impacts of different resource scenarios, but did not recommend precluding parties from providing other data, depending upon its reliability, probative value, and other factors.

The Chamber of Commerce and the Large Industrial Group emphasized the importance of energy costs to the business community and the economy; these parties cautioned against limiting the kinds of information parties may introduce or request when the rate impacts of the Renewable Energy Standards are at issue. The Chamber also recommended requiring utilities filing resource plans to file a “reference case” scenario based on the assumption that the Renewable Energy Objectives and Renewable Energy Standards had not been enacted.

2. Reliability

Most parties agreed that utility-specific reliability issues are best addressed in the context of the utilities’ annual reliability filings under Minnesota Rules 7826.0500 through 7826.0700 and that statewide and regional reliability issues are best addressed in the biennial transmission filings required under Minn. Stat. § 216B.2425 and by regional organizations charged with ensuring regional reliability.

C. Commission Action

The parties are clearly correct that resource plan proceedings generally offer the best opportunity to examine the utility-specific rate impact of meeting the Renewable Energy Standards. These proceedings are designed to provide detailed, long-term cost comparisons between different resource mixes; in theory they are ideally suited for gauging the rate impacts of resource choices resulting from legislative mandates. There is therefore no generalized need to establish a separate procedural track for monitoring the rate impact of the Renewable Energy Standards.

While five of the sixteen utilities subject to the Standards do not file resource plans, because their customer numbers within the state are too low, the Commission, the OES, and interested stakeholders will continue to monitor their rates, will accept voluntary filings on rate impact in the annual filings detailing their compliance with the Standards, and will of course examine rate impact information submitted in any petition to modify or delay any obligation under the Renewable Energy Standards. These safeguards are adequate at present and can be supplemented should the need arise.

The Commission concurs with the OES that forward-looking, long-term cost information is the most probative, reliable, and helpful in gauging the rate impacts of the Renewable Energy

Standards. Both the Standards and the utility initiatives undertaken to meet them are long-term projects whose costs and rate impact must be examined primarily in the future and in the long term. While the costs of past projects, undertaken or forgone, may have some relevance – and parties should not be precluded from introducing such evidence – the Commission concurs with the utilities that compelling them to develop and produce such cost information carries costs and risks that normally exceed its value.

The Commission will therefore clarify that intervenors in a resource plan proceeding who request information related to the rate impact of future compliance with the Renewable Energy Standards are making a reasonable request for information under Minn. Rules 7843.0300. Utilities must respond to these requests completely and under the time frames set by rule. Further, the Commission urges all parties not to lose sight of the fact that utilities always have the burden of proof to demonstrate that any cost they seek to recover from ratepayers is just and reasonable, whatever the nature of the cost.¹⁶

With these clarifications, the Commission sees no need at present to establish additional filing or reporting requirements on the rate impact of the Renewable Energy Standards.

Finally, as to reliability impacts, the Commission concurs with the OES and other stakeholders that the annual reliability reporting requirements of Minnesota Rules Chapter 7826 will promptly and adequately apprise the Commission, the OES, and other stakeholders of any utility-specific drop in reliability. The Commission also concurs that statewide reliability issues are best monitored through the biennial transmission filings, required under Minn. Stat. § 216B.2425 and specifically designed to reveal any systemic threats to statewide reliability. Similarly, regional reliability issues are best monitored by the regional organizations charged with ensuring regional reliability, such as the North American Electric Reliability Corporation and the Midwest Independent Transmission System Operator, which liaise with the Commission on reliability issues.

VI. Factors to be Weighed in Enforcement/Penalty Proceedings

A. Introduction

Under Minn. Stat. § 216B.1691, subd. 7, the Commission must regularly investigate utilities' compliance with the Renewable Energy Objectives and Standards and may issue orders to noncompliant utilities requiring them to build facilities, execute purchased power contracts, buy Renewable Energy Credits, or engage in other activities to achieve compliance. If noncompliant utilities disobey these orders, the Commission is authorized to assess financial penalties in an amount not to exceed the cost of compliance.

The September 2009 notice asked whether it would be helpful for the Commission to develop factors it would take into consideration in considering enforcement or penalty actions.

¹⁶ Minn. Stat. § 216B.03.

B. Stakeholder Comments

Several stakeholders considered it premature to begin articulating factors to consider in enforcement or penalty proceedings, since none of these proceedings have been held or are pending. Others thought that guidance was always helpful, but that another round of comments and/or further staff work was required before meaningful guidance could be given. Xcel pointed out that the Commission had articulated standards for judging the good faith of compliance efforts under the Renewable Energy Objectives in an earlier order and that those standards were essentially transferrable to the Renewable Energy Standards as well.

C. Commission Action

The Commission concurs with Xcel that the factors it has developed and articulated for evaluating compliance with the Renewable Energy Objectives are equally relevant to the Renewable Energy Standards. Those standards, which are set forth in section X of the first substantive order issued in this case, focus on whether the utility has committed the time, money, and other institutional resources necessary to meet its statutory obligations.¹⁷ These standards will be the starting point for evaluating compliance with the Renewable Energy Standards.

The Commission will also consider whether a non-complying utility promptly brought its noncompliance to the attention of the Commission and whether Renewable Energy Credits are available for purchase at a price that makes them a viable compliance alternative.

Apart from these basic considerations, the Commission concurs with the commenting stakeholders that situations raising enforcement or penalty issues are likely to be factually distinct and utility-specific and to require examination on a case-by-case basis.

ORDER

1. The Commission clarifies that it interprets Minn. Stat. § 216B.1691, subd. 1 to require the inclusion of supplies from the Western Area Power Administration in the total retail sales of utilities who aggregate and sell those supplies to members or customers.
2. Within 30 days of the date of this order, East River Electric Power Cooperative, L & O Power Cooperative, and Otter Tail Power Company shall make compliance filings in this docket stating whether and how their Renewable Energy Objectives/ Renewable Energy Standard percentages have changed from those reported in their earlier filings in Docket No. 08-1163.
3. The Commission clarifies that the percentages of total retail sales that non-nuclear utilities must generate or procure from eligible renewable technologies are as set forth below for the year identified and for every year forward until the next year and percentage identified:

¹⁷ Initial Order Detailing Criteria and Standards for Determining Compliance with Minn. Stat § 216B.1691 and Requiring Customer Notification by Certain Cooperative, Municipal, and Investor-Owned Distribution Utilities (June 4, 2004).

2011: 7%
2012-2015: 12%
2016-2019: 17%
2020-2024: 20%
2025: 25%

4. The Commission clarifies that a petition to modify or delay a Renewable Energy Standard may be filed at any time.
5. Any petition to modify or delay a Renewable Energy Standard shall include the following information: (a) a discussion of the reasons for concluding that compliance cannot be achieved by buying Renewable Energy Credits; (b) a plan for future compliance, as required under Minn. Stat. § 216B.1691, subd. 2b (c); and (c) the time frame within which the petitioner requests Commission action.
6. Petitions to modify or delay any Renewable Energy Standard shall comply with the service and filing requirements of Minnesota Rules 7829.1300 and, at least initially, follow the procedural track set forth in Minnesota Rules 7829.1400.
7. The Commission clarifies that it will use the proceedings and methods discussed in section V of this order to track the rate and reliability effects of the Renewable Energy Objectives and Standards. The Commission will accept voluntary filings on the rate impact of the Renewable Energy Objectives and Standards in the biennial compliance reports filed by utilities not required to file resource plans.
8. The Commission clarifies that it favors forward-looking, long-term cost information when analyzing the rate impacts of the Renewable Energy Objectives and Standards but will not preclude other types of cost information from being presented by the parties.
9. The Commission clarifies that intervenors in a resource plan proceeding who request information related to the rate impact of future compliance with the Renewable Energy Standards are making a reasonable request for information under Minn. Rules, part 7843.0300, subp. 8, and that utilities must promptly respond.
10. The Commission clarifies that it will evaluate compliance with the Renewable Energy Standards on a case-by-case basis, but will also consider the factors set forth below:
 - a. The factors articulated in its June 4, 2004 order for evaluating compliance with the Renewable Energy Objectives.
 - b. Whether the utility brought the noncompliance to the attention of the Commission in a timely manner.
 - c. Whether Renewable Energy Credits are available for purchase, and at what price.

11. This Order shall become effective immediately.

BY ORDER OF THE COMMISSION



Burl W. Haar
Executive Secretary



This document can be made available in alternative formats (i.e., large print or audio tape) by calling 651.201.2202 (voice). Persons with hearing or speech disabilities may call us through Minnesota Relay at 1.800.627.3529 or by dialing 711.

STATE OF MINNESOTA)
)SS
COUNTY OF RAMSEY)

AFFIDAVIT OF SERVICE

I, Margie DeLaHunt, being first duly sworn, deposes and says:

That on the 19th day of March, 2010 she served the attached

ORDER CLARIFYING CRITERIA AND STANDARDS FOR DETERMINING
COMPLIANCE UNDER MINN. STAT. 216B.1691.

MNPUC Docket Number: E-999/CI-03-869

- XX By depositing in the United States Mail at the City of St. Paul, a true and correct copy thereof, properly enveloped with postage prepaid
- XX By personal service
- XX By inter-office mail

to all persons at the addresses indicated below or on the attached list:

Commissioners
Carol Casebolt
Peter Brown
Eric Witte
Marcia Johnson
Kate Kahlert
Janet Gonzalez
Michelle Rebholz
Susan Mackenzie
Mary Swoboda
DOC Docketing
AG - PUC
Julia Anderson - OAG
John Lindell - OAG

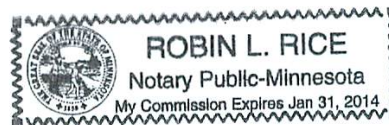
Margie DeLaHunt

Subscribed and sworn to before me,

a notary public, this 19th day of

March, 2010

Robin L. Rice
Notary Public



Docket No. E999/CI-03-869, March 19, 2010 Order

Suggested Order Language Modifications to Reflect Statutory Changes Made by H.F. No. 7

Should the Commission wish to use the March 19, 2010 Order in Docket No. E999/CI-03-869 as a starting point for future Orders, the Company respectfully suggests the following modifications and clarifications to the relevant Order Points:

4. *The Commission clarifies that a petition to modify or delay a ~~Renewable Energy~~ Standard under Minn. § Stat. 216B.1691 may be filed at any time.*
5. *Any petition to modify or delay a ~~Renewable Energy~~ Standard under Minn. Stat. § 216B.1691 shall include the following information: (a) a discussion of the reasons for concluding that compliance cannot be achieved by buying Renewable Energy Credits, ~~Alternative Energy Credits, or equivalent Environmental Attribute Credits, where applicable~~; (b) a plan for future compliance, as required under Minn. Stat. 216B.1691, subd. 2b (~~ee~~); and (c) the time frame within which the petitioner requests Commission action.*
6. *Petitions to modify or delay any ~~Renewable Energy~~ Standard under Minn. Stat. § 216B.1691 shall comply with the service and filing requirements of Minnesota Rules 7829.1300; and, ~~at least initially~~, follow the procedural track set forth in Minnesota Rules 7829.1400.*
7. *~~The Commission clarifies that it will use the proceedings and methods discussed in section V of this order to track the rate and reliability effects of the Renewable Energy Objectives and Standards. The Commission will accept voluntary filings on the rate impact of the Renewable Energy Objectives and Standards in the biennial compliance reports filed by utilities not required to file resource plans.~~*
8. *~~The Commission clarifies that it favors forward-looking, long-term cost information when analyzing the rate impacts of the Renewable Energy Objectives and Standards but will not preclude other types of cost information from being presented by the parties.~~*
9. *~~The Commission clarifies that intervenors in a resource plan proceeding who request information related to the rate impact of future compliance with the Renewable Energy Standards are making reasonable request for information under Minn. Rules, part 7843.0300, subp. 8, and that utilities must promptly respond.~~*

CERTIFICATE OF SERVICE

I, Victor Barreiro, hereby certify that I have this day served copies of the foregoing document on the attached list of persons.

xx by depositing a true and correct copy thereof, properly enveloped with postage paid in the United States mail at Minneapolis, Minnesota

xx electronic filing

DOCKET No. E999/CI-23-151

Dated this 28th day of October 2025

/s/

Victor Barreiro
Regulatory Administrator

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
1	Michael	Ahern	ahern.michael@dorsey.com	Dorsey & Whitney, LLP		50 S 6th St Ste 1500 Minneapolis MN, 55402-1498 United States	Electronic Service		Yes	23-151Official
2	Steve	Albrecht	steve.albrecht@shakopeedakota.org	Shakopee Mdewakanton Sioux Community		Shakopee Mdewakanton Sioux Community 2330 Sioux Trail NW Prior Lake MN, 55372 United States	Electronic Service		No	23-151Official
3	Jared	Alholinna	jalholinna@greenergy.com	Great River Energy		12300 Elm Creek Boulevard Maple Grove MN, 55369 United States	Electronic Service		No	23-151Official
4	Michael	Allen	michael.allen@allenergysolar.com	All Energy Solar		721 W 26th st Suite 211 Minneapolis MN, 55405 United States	Electronic Service		No	23-151Official
5	Gary	Ambach	gambach@slipstreaminc.org	Slipstream, Inc.		8973 SW Village Loop Chanhassen MN, 55317 United States	Electronic Service		No	23-151Official
6	Jay	Anderson	jaya@cmpas.org	CMPAS		7550 Corporate Way Suite 100 Eden Prairie MN, 55344 United States	Electronic Service		No	23-151Official
7	Keith	Anderson	keith.anderson@shakopeedakota.org	Shakopee Mdewakanton Sioux Community		Shakopee Mdewakanton Sioux Community 2330 Sioux Trail NW Prior Lake MN, 55372 United States	Electronic Service		No	23-151Official
8	Maria	Anderson	manderson@eastriver.coop	East River Electric Power Cooperative, Inc.		P.O. Box 227 211 S. Harth Ave. Madison SD, 57042 United States	Electronic Service		No	23-151Official
9	Susan	Arntz	sarntz@mankatomn.gov	City Of Mankato		P.O. Box 3368 Mankato MN, 56002-3368 United States	Electronic Service		No	23-151Official
10	Mara	Ascheman	mara.k.ascheman@xcelenergy.com	Xcel Energy		414 Nicollet Mall Fl 5 Minneapolis MN, 55401 United States	Electronic Service		No	23-151Official
11	Ray	Auginaush, Sr.	ray.auginaush@whiteearth-nsn.gov	White Earth Nation		White Earth Tribal Headquarters 35500 Eagle View Road Ogema MN, 56569 United States	Electronic Service		No	23-151Official
12	John	Aune	johna@bluehorizonsolar.com	Blue Horizon Energy		171 Cheshire Ln Ste 500 Plymouth MN, 55441 United States	Electronic Service		No	23-151Official
13	Mark	Bakk	mbakk@lcp.coop	Lake Country Power		26039 Bear Ridge Drive	Electronic Service		No	23-151Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						Cohasset MN, 55721 United States				
14	Jessica L	Bayles	jessica.bayles@stoel.com	Stoel Rives LLP		1150 18th St NW Ste 325 Washington DC, 20036 United States	Electronic Service		No	23-151Official
15	Daniel	Becchetti	dbecchetti@greenergy.com	Great River Energy		12300 Elm Creek Boulevard Maple Grove MN, 55369 United States	Electronic Service		No	23-151Official
16	Todd	Beck	tbeck@greenergy.com			null null, null United States	Electronic Service		No	23-151Official
17	Brian	Bell	bell.brian@dorsey.com	Dorsey & Whitney LLP		50 South Sixth St. Suite 1500 Minneapolis MN, 55402 United States	Electronic Service		Yes	23-151Official
18	Amadeo	Bellino	amadeo.bellino@whiteearth-nsn.gov	White Earth Nation		White Earth Tribal Headquarters 35500 Eagle View Road Ogema MN, 56569 United States	Electronic Service		No	23-151Official
19	David	Bender	dbender@earthjustice.org	Earthjustice		1001 G Street NW Suite 1000 Washington DC, 20001 United States	Electronic Service		No	23-151Official
20	Melanie	Benjamin	melanie.benjamin@millelacsband.com			43408 Oodena Drive Onamia MN, 56359 United States	Electronic Service		No	23-151Official
21	Sasha	Bergman	sasha.bergman@state.mn.us		Public Utilities Commission		Electronic Service		No	23-151Official
22	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	23-151Official
23	Laura	Bishop	laura.bishop@state.mn.us		Minnesota Pollution Control Agency	520 Lafayette Rd Saint Paul MN, 55155 United States	Electronic Service		No	23-151Official
24	William	Black	bblack@mmua.org	MMUA		Suite 200 3131 Fernbrook Lane North Plymouth MN, 55447 United States	Electronic Service		No	23-151Official
25	Hunter	Boldt	hunterboldt@redlakenation.org	Red Lake Nation		15484 Migizi Drive Red Lake MN, 56671 United States	Electronic Service		No	23-151Official
26	Peter	Boney	pboney@boisforte-nsn.gov	Bois Forte Band of Chippewa		Bois Forte Tribal Government 5344 Lakeshore Drive Nett Lake MN,	Electronic Service		No	23-151Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						55772 United States				
27	Jerry	Bormann	jbormann@mpsutility.com	Moorhead Public Service Commission (E)		500 Center Ave PO Box 779 Moorhead MN, 56561-0779 United States	Electronic Service		No	23-151Official
28	Sheldon	Boyd	sheldon.boyd@millelacsband.com	Mille Lacs Band of Ojibwe		43408 Oodena Drive Onamia MN, 56359 United States	Electronic Service		No	23-151Official
29	Jon	Brekke	jbrekke@greenergy.com	Great River Energy		12300 Elm Creek Boulevard Maple Grove MN, 55369-4718 United States	Electronic Service		No	23-151Official
30	Mark B.	Bring	mbring@otpc.com	Otter Tail Power Company		215 South Cascade Street PO Box 496 Fergus Falls MN, 56538-0496 United States	Electronic Service		No	23-151Official
31	Matthew	Brodin	mbrodin@allete.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	23-151Official
32	B. Andrew	Brown	brown.andrew@dorsey.com	Dorsey & Whitney LLP		Suite 1500 50 South Sixth Street Minneapolis MN, 55402-1498 United States	Electronic Service		No	23-151Official
33	Danny	Brown	dbrown@eastriver.coop	East River Electric Power Cooperative, Inc.		P.O. Box 227 211 S. Harth Ave. Madison SD, 57042 United States	Electronic Service		No	23-151Official
34	Marvin Ray	Bruneau	marvin.bruneau@millelacsband.com	Mille Lacs Band of Ojibwe		43408 Oodena Drive Onamia MN, 56359 United States	Electronic Service		No	23-151Official
35	Christina	Brusven	cbrusven@fredlaw.com	Fredrikson Byron		60 S 6th St Ste 1500 Minneapolis MN, 55402-4400 United States	Electronic Service		No	23-151Official
36	Scott	Buchanan	scottbuchanan@fdlrez.com	Fond du Lac Band of Lake Superior Chippewa		1720 Big Lake Road Cloquet MN, 55720 United States	Electronic Service		No	23-151Official
37	Shelley	Buck	shelley.buck@piic.org	Prairie Island Indian Community		Prairie Island Indian Community 5636 Sturgeon Lake Road Welch MN, 55089 United States	Electronic Service		No	23-151Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
38	John	Bucknell		Virtus Solis Technologies, Inc.		1511 Pebble Point Drive Troy MI, 48085 United States	Paper Service		No	23-151Official
39	Robert	Budreau	robert.budreau@llojibwe.net	Leech Lake Band of Ojibwe		190 Sailstar Drive NW Cass Lake MN, 56633 United States	Electronic Service		No	23-151Official
40	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	23-151Official
41	Brian	Burandt	brian.burandt@connexusenergy.com	Connexus Energy		14601 Ramsey Blvd Ramsey MN, 55303 United States	Electronic Service		No	23-151Official
42	Jessica	Burdette	jessica.burdette@state.mn.us		Department of Commerce	85 7th Place East Suite 500 St. Paul MN, 55101 United States	Electronic Service		No	23-151Official
43	Richard	Burud	rgburud@msn.com	Southern Minnesota Energy Cooperative		31110 Cooperative Way Rushford MN, 55971 United States	Electronic Service		No	23-151Official
44	Jennifer	Cady	jjcady@mnpower.com	Minnesota Power		30 W Superior St Duluth MN, 55802 United States	Electronic Service		No	23-151Official
45	James	Canaday	james.canaday@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	Suite 1400 445 Minnesota St. St. Paul MN, 55101 United States	Electronic Service		Yes	23-151Official
46	Thomas	Carlson	thomas.carlson@edf-re.com	EDF Renewable Energy		10 2nd St NE Ste. 400 Minneapolis MN, 55413 United States	Electronic Service		No	23-151Official
47	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	23-151Official
48	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	23-151Official
49	Cathy	Chavers	cchavers@boisforte-nsn.gov	Bois Forte Band of Chippewa		Bois Forte Tribal Government 5344 Lakeshore Drive Nett Lake MN, 55772 United States	Electronic Service		No	23-151Official
50	Marc	Child	mchild@grenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	23-151Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
51	Michael	Childs, Jr.	michael.childsjr@piic.org	Prairie Island Indian Community		Prairie Island Indian Community 5636 Sturgeon Lake Road Welch MN, 55089 United States	Electronic Service		No	23-151Official
52	Ray	Choquette	rchoquette@agp.com	Ag Processing Inc.		12700 West Dodge Road PO Box 2047 Omaha NE, 68103-2047 United States	Electronic Service		No	23-151Official
53	Steve W.	Chriss	stephen.chriss@walmart.com	Wal-Mart		2001 SE 10th St. Bentonville AR, 72716-5530 United States	Electronic Service		No	23-151Official
54	John	Coffman	john@johncoffman.net	AARP		871 Tuxedo Blvd. St. Louis MO, 63119-2044 United States	Electronic Service		No	23-151Official
55	Kenneth A.	Colburn	kcolburn@symbioticstrategies.com	Symbiotic Strategies, LLC		26 Winton Road Meredith NH, 32535413 United States	Electronic Service		No	23-151Official
56	Generic	Commerce Attorneys	commerce.attorneys@ag.state.mn.us		Office of the Attorney General - Department of Commerce	445 Minnesota Street Suite 1400 St. Paul MN, 55101 United States	Electronic Service		Yes	23-151Official
57	Jean	Comstock	jean.comstock.dbcc@gmail.com	St. Paul 350		729 6th St E St. Paul MN, 55106 United States	Electronic Service		No	23-151Official
58	Christopher	Cooper	chris.cooper@resource-solutions.org			1012 Torney Avenue San Francisco CA, 94129 United States	Electronic Service		No	23-151Official
59	Hillary	Creurer	hcreurer@allete.com	Minnesota Power		30 W Superior St Duluth MN, 55802 United States	Electronic Service		No	23-151Official
60	George	Crocker	gwillc@nawo.org	North American Water Office		5093 Keats Avenue Lake Elmo MN, 55042 United States	Electronic Service		No	23-151Official
61	Rebecca	Crooks Stratton	rebecca.crooks-stratton@shakopeedakota.org	Shakopee Mdewakanton Sioux Community		Shakopee Mdewakanton Sioux Community 2330 Sioux Trail NW Prior Lake MN, 55372 United States	Electronic Service		No	23-151Official
62	Brooke	Cunningham	health.review@state.mn.us	Minnesota Department of Health		PO Box 64975 St. Paul MN, 55164-0975 United States	Electronic Service		No	23-151Official
63	Stacy	Dahl	sdahl@minnkota.com	Minnkota Power Cooperative, Inc.		5301 32nd Ave S Grand Forks ND, 58201 United States	Electronic Service		No	23-151Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
64	Michael	Daley	mdaley@carbonsolutionsgroup.com	Carbon Solutions Group LLC		2045 W Grand Ave. Ste B PMB #58751 Chicago IL, 60612 United States	Electronic Service		No	23-151Official
65	Lorene	Damsits	lorened@cmpasgroup.org	Central MN MPA		459 S Grove St Blue Earth MN, 56013 United States	Electronic Service		No	23-151Official
66	Lisa	Daniels	lisadaniels@windustry.org	Windustry		201 Ridgewood Ave Minneapolis MN, 55403 United States	Electronic Service		No	23-151Official
67	Miyah	Danielson	miyahdanielson@fdlrez.com	Fond du Lac Band of Lake Superior Chippewa		1720 Big Lake Road Cloquet MN, 55720 United States	Electronic Service		No	23-151Official
68	Chris	Davis	christopher.davis@state.mn.us		Department of Commerce	Suite 280 85 Seventh Place East St. Paul MN, 55101-2198 United States	Electronic Service		No	23-151Official
69	Rob	Davis	rob@mrets.org	M-RETS		60 S 6th Street Suite 2800 Minneapolis MN, 55402 United States	Electronic Service		No	23-151Official
70	Jason	Decker	jason.decker@llojibwe.net	Leech Lake Band of Ojibwe		190 Sailstar Drive NW Cass Lake MN, 56633 United States	Electronic Service		No	23-151Official
71	James	Denniston	james.r.denniston@xcelenergy.com	Xcel Energy Services, Inc.		414 Nicollet Mall, 401-8 Minneapolis MN, 55401 United States	Electronic Service		No	23-151Official
72	Bobby	Deschampe	robertdeschampe@grandportage.com	Grand Portage Band of Lake Superior Chippewa		PO Box 428 Grand Portage MN, 55605 United States	Electronic Service		No	23-151Official
73	Curt	Dieren	curt.dieren@dgr.com	L&O Power Cooperative		1302 S Union St Rock Rapids IA, 51246 United States	Electronic Service		No	23-151Official
74	Kami	Diver	kamidiver@fdlrez.com	Fond du Lac Band of Lake Superior Chippewa		1720 Big Lake Road Cloquet MN, 55720 United States	Electronic Service		No	23-151Official
75	Becky	Dobbs	bdobbs@grenergy.com			null null, null United States	Electronic Service		No	23-151Official
76	J.	Drake Hamilton	hamilton@fresh-energy.org	Fresh Energy		408 St Peter St Ste 350 Saint Paul MN, 55101 United States	Electronic Service		No	23-151Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
77	Shane	Drift	sdrift@boisforte-nsn.gov	Bois Forte Band of Chippewa		Bois Forte Tribal Government 5344 Lakeshore Drive Nett Lake MN, 55772 United States	Electronic Service		No	23-151Official
78	Jeremy	Duehr	jduehr@fredlaw.com	Fredrikson & Byron, P.A.		60 S Sixth St Ste 1500 Minneapolis MN, 55402-4400 United States	Electronic Service		No	23-151Official
79	Adam	Duininck	aduininck@ncsrcc.org	North Central States Regional Council of Carpenters		700 Olive Street St. Paul MN, 55130 United States	Electronic Service		No	23-151Official
80	Kristin W	Duncanson	kw.duncanson@gmail.com			57746 Highway 30 Mapleton MN, 56065 United States	Electronic Service		No	23-151Official
81	Wally	Dupuis	wallydupuis@fdlband.org	Fond du Lac Band of Lake Superior Chippewa		1720 Big Lake Road Cloquet MN, 55720 United States	Electronic Service		No	23-151Official
82	Kevin	Dupuis, Sr.	kevindupuis@fdlrez.com			Reservation Business Committee 1720 Big Lake Rd Cloquet MN, 55720 United States	Electronic Service		No	23-151Official
83	Brian	Edstrom	briane@cubminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota St Ste W1360 Saint Paul MN, 55101 United States	Electronic Service		No	23-151Official
84	Jamie	Edwards	jamie.edwards@millelacsband.com	Mille Lacs Band of Ojibwe		43408 Oodena Drive Onamia MN, 56358 United States	Electronic Service		No	23-151Official
85	Kristen	Eide Tollefson	healingsystems69@gmail.com	R-CURE		28477 N Lake Ave Frontenac MN, 55026-1044 United States	Electronic Service		No	23-151Official
86	Michael	Fairbanks	michael.fairbanks@whiteearth-nsn.gov	White Earth Reservation Business Committee		PO Box 418 White Earth MN, 56591 United States	Electronic Service		No	23-151Official
87	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	23-151Official
88	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	23-151Official
89	Terri	Finn	terri.goggleye@llojibwe.net			null null, null United States	Electronic Service		No	23-151Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
90	Mike	Fiterman	mikefiterman@libertydiversified.com	Liberty Diversified International		5600 N Highway 169 Minneapolis MN, 55428-3096 United States	Electronic Service		No	23-151Official
91	Christine	Fox	cfox@itasca-mantrap.com	Itasca-Mantrap Coop. Electric Assn.		PO Box 192 Park Rapids MN, 56470 United States	Electronic Service		No	23-151Official
92	Lucas	Franco	lfranco@liunagroc.com	LIUNA		81 Little Canada Rd E Little Canada MN, 55117 United States	Electronic Service		No	23-151Official
93	Ronald J.	Franz	ronald.franz@dairylandpower.com	Dairyland Power Cooperative		3200 East Ave S PO Box 817 La Crosse WI, 54602-0817 United States	Electronic Service		No	23-151Official
94	Nathan	Franzen	nathan@nationalgridrenewables.com	Geronimo Energy, LLC		8400 Normandale Lake Blvd Ste 1200 Bloomington MN, 55437 United States	Electronic Service		No	23-151Official
95	Gary	Frazer	gfrazier@mnchippewatribe.org	Minnesota Chippewa Tribe		PO Box 217 Cass Lake MN, 56633 United States	Electronic Service		No	23-151Official
96	Barb	Freese	bfreese@mncenter.org	Minnesota Center for Environmental Advocacy		1919 University Ave W Ste 515 Saint Paul MN, 55104-3435 United States	Electronic Service		No	23-151Official
97	Christopher	Friez	christopher.friez@nacco.com	NACCO Natural Resources/North American Coal		918 E. Divide Ave., Suite 200 Bismarck ND, 58501 United States	Electronic Service		No	23-151Official
98	Stacey	Fujii	sfujii@grenergy.com	Great River Energy		12300 Elm Creek Boulevard Maple Grove MN, 55369-4718 United States	Electronic Service		No	23-151Official
99	Jessica	Fyhrie	jfyhrie@otpc.com	Otter Tail Power Company		PO Box 496 Fergus Falls MN, 56538-0496 United States	Electronic Service		Yes	23-151Official
100	Edward	Garvey	garveyed@aol.com	Residence		32 Lawton St Saint Paul MN, 55102 United States	Electronic Service		No	23-151Official
101	Benjamin	Gerber	ben@mrets.org	Midwest Renewable Energy Tracking System		60 South Sixth Street Suite 2800 Minneapolis MN, 55402 United States	Electronic Service		No	23-151Official
102	David P.	Geschwind	dp.geschwind@smmpa.org	Southern Minnesota Municipal Power Agency		500 First Avenue SW Rochester MN, 55902 United States	Electronic Service		No	23-151Official
103	Shannon	Geshick	shannon.geshick@state.mn.us	Minnesota Indian Affairs Council (MIAC)		null null, null United States	Electronic Service		No	23-151Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
104	Allen	Gleckner	gleckner@fresh-energy.org	Fresh Energy		408 St. Peter Street Ste 350 Saint Paul MN, 55102 United States	Electronic Service		No	23-151Official
105	Jenny	Glumack	jenny@mrea.org	Minnesota Rural Electric Association		11640 73rd Ave N Maple Grove MN, 55369 United States	Electronic Service		No	23-151Official
106	Julie	Goehring	julie@redriverbasincommission.org			708 70 Ave NW Moorhead MN, 56560 United States	Electronic Service		No	23-151Official
107	Todd J.	Guerrero	todd.guerrero@kutakrock.com	Kutak Rock LLP		Suite 1750 220 South Sixth Street Minneapolis MN, 55402-1425 United States	Electronic Service		No	23-151Official
108	Tessa	Haagenson	tessa.haagenson@connexusenergy.com	Connexus Energy		14601 Ramsey Blvd NW Ramsey MN, 55303 United States	Electronic Service		No	23-151Official
109	Jeffrey	Haase	jhaase@grenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	23-151Official
110	Hal	Halpern	halhalpern@clpower.com	Cooperative Light & Power		1554 Hwy 2 P0 Box 69 Two Harbors MN, 55616 United States	Electronic Service		No	23-151Official
111	Jeremy	Hamilton	jhamilton@uppersiouxcommunity-nsn.gov	Upper Sioux Community		Upper Sioux Community PO Box 147 Granite Falls MN, 56241 United States	Electronic Service		No	23-151Official
112	David A.	Hansen	hansen@federatedrea.coop	Federated Rural Electric Association		77100 U.S. Highway 71 PO Box 69 Jackson MN, 56143 United States	Electronic Service		No	23-151Official
113	James	Hartson				59931 300th Street Waltham MN, 55982 United States	Paper Service		No	23-151Official
114	Amy	Hastings	amyh@uppersiouxcommunity-nsn.gov	Upper Sioux Community		5722 Travers Lane PO Box 147 Granite Falls MN, 56241 United States	Electronic Service		No	23-151Official
115	Erik	Hatlestad	erik@cureriver.org			117 1st St Montevideo MN, 56265 United States	Electronic Service		No	23-151Official
116	Kim	Havey	kim.havey@minneapolismn.gov	City of Minneapolis		350 South 5th Street, Suite 315M Minneapolis MN, 55415 United States	Electronic Service		No	23-151Official
117	Philip	Hayet	phayet@jkenn.com	J. Kennedy and Associates, Inc.		570 Colonial Park Drive Suite 305 Roswell GA,	Electronic Service		No	23-151Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						30075-3770 United States				
118	Adam	Heinen	aheinen@dakotaelectric.com	Dakota Electric Association		4300 220th St W Farmington MN, 55024 United States	Electronic Service		No	23-151Official
119	Annete	Henkel	mui@mnuutilityinvestors.org	Minnesota Utility Investors		413 Wacouta Street #230 St.Paul MN, 55101 United States	Electronic Service		No	23-151Official
120	Jessy	Hennesy	jessy.hennesy@avantenergy.com	Avant Energy		220 S. Sixth St. Ste 1300 Minneapolis MN, 55402 United States	Electronic Service		No	23-151Official
121	Kristin	Henry	kristin.henry@sierraclub.org	Sierra Club		2101 Webster St Ste 1300 Oakland CA, 94612 United States	Electronic Service		No	23-151Official
122	Benjamin	Hertz	bhertz@bepc.com	Basin Electric Power Cooperative		1717 E Interstate Ave Bismarck ND, 58503 United States	Electronic Service		Yes	23-151Official
123	Holly	Hinman	holly.r.hinman@xcelenergy.com	Xcel Energy		414 Nicollet Mall, 7th Floor Minneapolis MN, 55401 United States	Electronic Service		No	23-151Official
124	Joe	Hoffman	ja.hoffman@smmpa.org	SMMPA		500 First Ave SW Rochester MN, 55902-3303 United States	Electronic Service		No	23-151Official
125	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	23-151Official
126	Ronald	Horman	rhorman@redwoodelectric.com	Redwood Electric Cooperative		60 Pine Street Clements MN, 56224 United States	Electronic Service		No	23-151Official
127	Rick	Horton	rhorton@minnesotaforests.com	Minnesota Forest Industries		324 West Superior Street 903 Medical Arts Building Duluth MN, 55802 United States	Electronic Service		No	23-151Official
128	Robbie	Howe	robbie.howe@llojibwe.net	Leech Lake Band of Ojibwe		190 Sailstar Drive NW Cass Lake MN, 56633 United States	Electronic Service		No	23-151Official
129	John	Ihle	ljihle@rrt.net	PlainStates Energy LLC		27451 S Hwy 34 Barnesville MN, 56514 United States	Electronic Service		No	23-151Official
130	Annie	Jackson	cheryl.jackson@whiteearth-nsn.gov	White Earth Nation		White Earth Tribal Headquarters 35500 Eagle View Road Ogemo MN, 56569 United States	Electronic Service		No	23-151Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
131	Faron	Jackson, Sr.	faron.jackson@llojibwe.net			190 Sailstar Drive NW Cass Lake MN, 56633 United States	Electronic Service		No	23-151Official
132	Casey	Jacobson	cjacobson@bepc.com	Basin Electric Power Cooperative		1717 East Interstate Avenue Bismarck ND, 58501 United States	Electronic Service		No	23-151Official
133	Justin	Jahnz	justin.jahnz@ecemn.com	East Central Energy		412 Main Ave N Braham MN, 55006 United States	Electronic Service		No	23-151Official
134	Alan	Jenkins	aj@jenkinsatlaw.com	Jenkins at Law		2950 Yellowtail Ave. Marathon FL, 33050 United States	Electronic Service		No	23-151Official
135	Nathan	Jensen	njensen@otpc.com	Otter Tail Power Company		215 S. Cascade St. Fergus Falls MN, 56537 United States	Electronic Service		No	23-151Official
136	Kevin	Jensvold	kevinj@uppersiouxcommunity-nsn.gov	Upper Sioux Community		PO Box 147 Granite Falls MN, 56241-0147 United States	Electronic Service		No	23-151Official
137	Annette	Johnson	annette.johnson@redlakenation.org	Red Lake Nation		15484 Migizi Drive Red Lake MN, 56671 United States	Electronic Service		No	23-151Official
138	Jody	Johnson	jody.johnson@piic.org	Prairie Island Indian Community		5636 Sturgeon Lake Rd Welch MN, 55089 United States	Electronic Service		No	23-151Official
139	Richard	Johnson	rick.johnson@lawmoss.com	Moss & Barnett		150 S. 5th Street Suite 1200 Minneapolis MN, 55402 United States	Electronic Service		No	23-151Official
140	Sarah	Johnson Phillips	sjphillips@stoel.com	Stoel Rives LLP		33 South Sixth Street Suite 4200 Minneapolis MN, 55402 United States	Electronic Service		No	23-151Official
141	Nate	Jones	njones@hcpd.com	Heartland Consumers Power		PO Box 248 Madison SD, 57042 United States	Electronic Service		No	23-151Official
142	Nick	Kaneski	nick.kaneski@enbridge.com	Enbridge Energy Company, Inc.		11 East Superior St Ste 125 Duluth MN, 55802 United States	Electronic Service		No	23-151Official
143	Veda	Kanitz	vmkanitz@gmail.com			null null, null United States	Electronic Service		No	23-151Official
144	Jenny	Kartes	jkartes@arrowhead.coop	Arrowhead Electric Cooperative, Inc.(P)		PO Box 39 5401 W Hwy 61 Lutsen MN, 55612 United States	Electronic Service		No	23-151Official
145	David	Kempf	dkempf@greenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove	Electronic Service		No	23-151Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						MN, 55369 United States				
146	William	Kenworthy	will@votesolar.org			1 South Dearborn St Ste 2000 Chicago IL, 60603 United States	Electronic Service		No	23-151Official
147	Becky	Kern	bkern@bepc.com	Basin Electric Power Cooperative		1717 E Interstate Ave Bismarck ND, 58501 United States	Electronic Service		Yes	23-151Official
148	Samuel B.	Ketchum	sketchum@kennedy-graven.com	Kennedy & Graven, Chartered		150 S 5th St Ste 700 Minneapolis MN, 55402 United States	Electronic Service		No	23-151Official
149	Nazir	Khan	nazir@mnejtable.org	Minnesota Environmental Justice Table		2720 E 22nd St Minneapolis MN, 55406 United States	Electronic Service		No	23-151Official
150	Hudson	Kingston	hudson@curemn.org			PO Box 712 Ely MN, 55731 United States	Electronic Service		No	23-151Official
151	Kate	Knuth	kate.knuth@gmail.com			2347 14th Terrace NW New Brighton MN, 55112 United States	Electronic Service		No	23-151Official
152	Frank	Kohlasch	frank.kohlasch@state.mn.us		Minnesota Pollution Control Agency	520 Lafayette Rd N. St. Paul MN, 55155 United States	Electronic Service		No	23-151Official
153	Brian	Kolbinger	brian@beckertownship.org	Becker Township Board		PO Box 248 12165 Hancock St Becker MN, 55308 United States	Electronic Service		No	23-151Official
154	Seth	Koneczny	st.koneczny@smmpa.org	SMMPA		500 First Avenue, SW Rochester MN, 55902-3303 United States	Electronic Service		No	23-151Official
155	Brian	Krambeer	bkrambeer@mienergy.coop	MiEnergy Cooperative		PO Box 626 31110 Cooperative Way Rushford MN, 55971 United States	Electronic Service		No	23-151Official
156	Randy	Kramer	rlkramer89@gmail.com	Water and Soil Resources Board		42808 Co. Rd. 11 Bird Island MN, 55310 United States	Electronic Service		No	23-151Official
157	Allen	Krug	allen.krug@xcelenergy.com	Xcel Energy		414 Nicollet Mall-7th fl Minneapolis MN, 55401 United States	Electronic Service		No	23-151Official
158	Kay	Kuhlmann	teri.swanson@ci.red-wing.mn.us	City Of Red Wing		315 West Fourth Street Red Wing MN, 55066 United States	Electronic Service		No	23-151Official
159	Brenda	Kyle	bkyle@stpaulchamber.com	St. Paul Area Chamber of Commerce		401 N Robert Street Suite 150 St Paul MN,	Electronic Service		No	23-151Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						55101 United States				
160	Therese	LaCanne	tlacanne@greenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	23-151Official
161	Matthew	Lacey	mlacey@greenergy.com	Great River Energy		12300 Elm Creek Boulevard Maple Grove MN, 55369-4718 United States	Electronic Service		No	23-151Official
162	Becky	Lammi	cityclerk@ci.aurora.mn.us	City of Aurora		16 W 2nd Ave N PO Box 160 Aurora MN, 55705 United States	Electronic Service		No	23-151Official
163	Carmel	Laney	carmel.laney@stoel.com	Stoel Rives LLP		33 South Sixth Street Suite 4200 Minneapolis MN, 55402 United States	Electronic Service		No	23-151Official
164	Arthur	LaRose	arthur.larose@llojbwe.net	Leech Lake Band of Ojibwe		190 Sailstar Drive NW Cass Lake MN, 56633 United States	Electronic Service		No	23-151Official
165	Robert L.	Larsen	robert.larsen@lowersioux.com	Lower Sioux Indian Community		PO Box 308 39527 Reservation Highway 1 Morton MN, 56270 United States	Electronic Service		No	23-151Official
166	Emily	Larson	elarson@duluthmn.gov	City of Duluth		411 W 1st St Rm 403 Duluth MN, 55802 United States	Electronic Service		No	23-151Official
167	James D.	Larson	james.larson@avantenergy.com	Avant Energy Services		220 S 6th St Ste 1300 Minneapolis MN, 55402 United States	Electronic Service		No	23-151Official
168	Mark	Larson	mlarson@meekeer.coop	Meeker Coop Light & Power Assn		1725 Highway 12 E Ste 100 Litchfield MN, 55355 United States	Electronic Service		No	23-151Official
169	Peder	Larson	plarson@larkinhoffman.com	Larkin Hoffman Daly & Lindgren, Ltd.		8300 Norman Center Drive Suite 1000 Bloomington MN, 55437 United States	Electronic Service		No	23-151Official
170	Rachel	Leonard	rachel.leonard@ci.monticello.mn.us	City of Monticello		505 Walnut St Ste 1 Monticello MN, 55362 United States	Electronic Service		No	23-151Official
171	Dan	Leshner	dlesher@greenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	23-151Official
172	Annie	Levenson Falk	annielf@cubminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota Street, Suite W1360 St. Paul MN, 55101 United States	Electronic Service		No	23-151Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
173	Jesse	Levine	jesse_levine@afandpa.org			1101 K St NW Suite 700 Washington DC, 20005 United States	Electronic Service		No	23-151Official
174	Amy	Liberkowski	amy.a.liberkowski@xcelenergy.com	Xcel Energy		414 Nicollet Mall 7th Floor Minneapolis MN, 55401-1993 United States	Electronic Service		No	23-151Official
175	Eric	Lindberg	elindberg@mncenter.org	Minnesota Center for Environmental Advocacy		1919 University Avenue West Suite 515 Saint Paul MN, 55104-3435 United States	Electronic Service		No	23-151Official
176	Eric	Lipman	eric.lipman@state.mn.us		Office of Administrative Hearings	PO Box 64620 St. Paul MN, 55164-0620 United States	Electronic Service		Yes	23-151Official
177	Michelle	Lommel	mlommel@greenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	23-151Official
178	Bob	Long	rlong@larkinhoffman.com	Larkin Hoffman (Silicon Energy)		1500 Wells Fargo Plaza 7900 Xerxes Ave S Bloomington MN, 55431 United States	Electronic Service		No	23-151Official
179	Nicole	Luckey	nluckey@invenergyllc.com	Invenergy LLC		1 S. Wacker Suite 1800 Chicago IL, 60606 United States	Electronic Service		No	23-151Official
180	Susan	Ludwig	sludwig@mnpower.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	23-151Official
181	Robert	Lunder	robert.lunder@mdu.com	Montana-Dakota Utilities (ET)		400 N 4th St Bismark ND, 58501 United States	Electronic Service		No	23-151Official
182	Alice	Madden	alice@communitypowermn.org	Community Power		2720 E 22nd St Minneapolis MN, 55406 United States	Electronic Service		No	23-151Official
183	Scott	Magnuson	smagnuson@bpu.org	Brainerd Public Utilities		8027 Highland Scenic Rd Baxter MN, 56425 United States	Electronic Service		No	23-151Official
184	Kavita	Maini	kmains@wi.rr.com	KM Energy Consulting, LLC		961 N Lost Woods Rd Oconomowoc WI, 53066 United States	Electronic Service		No	23-151Official
185	Christine	Marquis	regulatory.records@xcelenergy.com	Xcel Energy		414 Nicollet Mall MN1180-07-MCA Minneapolis MN, 55401 United States	Electronic Service		No	23-151Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
186	Emily	Marshall	emarshall@lourismarshall.com	Miller O'Brien Jensen, PA		120 S. 6th Street Suite 2400 Minneapolis MN, 55402 United States	Electronic Service		No	23-151Official
187	Mary	Martinka	mary.a.martinka@xcelenergy.com	Xcel Energy Inc		414 Nicollet Mall 7th Floor Minneapolis MN, 55401 United States	Electronic Service		No	23-151Official
188	Gregg	Mast	gmast@cleanenergyeconomymn.org	Clean Energy Economy Minnesota		4808 10th Avenue S Minneapolis MN, 55417 United States	Electronic Service		No	23-151Official
189	Shena	Matrious	shena.matrious@millelacsband.com	Mille Lacs Band of Ojibwe		43408 Oodena Drive Onamia MN, 56349 United States	Electronic Service		No	23-151Official
190	Daryl	Maxwell	dmaxwell@hydro.mb.ca	Manitoba Hydro		360 Portage Ave FL 16 PO Box 815, Station Main Winnipeg MB, R3C 2P4 Canada	Electronic Service		No	23-151Official
191	Tim	McCarthy	tim.mccarthy@siouxvalleyenergy.com	Sioux Valley Southwestern Electric Cooperative, Inc. d/b/a Sioux Valley Energy		null null, null United States	Electronic Service		No	23-151Official
192	Scot	McClure	scotmcclure@alliantenergy.com	Interstate Power And Light Company		4902 N Biltmore Ln PO Box 77007 Madison WI, 53707-1007 United States	Electronic Service		No	23-151Official
193	April	McCormick	aprlm@grandportage.com	Grand Portage Band of Lake Superior Chippewa		PO Box 428 Grand Portage MN, 55605 United States	Electronic Service		No	23-151Official
194	Jess	McCullough	jmccullough@mnpower.com	Minnesota Power		30 W Superior St Duluth MN, 55802 United States	Electronic Service		No	23-151Official
195	Sara G	McGrane	smcgrane@felhaber.com	Felhaber Larson		220 S 6th St Ste 2200 Minneapolis MN, 55420 United States	Electronic Service		No	23-151Official
196	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	23-151Official
197	Harvey	McMahon	hcmahon@otpc.com	Otter Tail Power Company		215 South Cascade Street Fergus Falls MN, 56537 United States	Electronic Service		No	23-151Official
198	Taylor	McNair	taylor@gridlab.org			668 Capp Street San Francisco CA, 94110 United States	Electronic Service		No	23-151Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
199	Ronald	Meier	rmeier@mcleodcoop.com	McLeod Cooperative Power		3515 11th St East Glencoe MN, 55336 United States	Electronic Service		No	23-151Official
200	Melanie	Mesko Lee	melanie.lee@burnsvillemn.gov	City of Burnsville		100 Civic Center Parkway Burnsville MN, 55337-3867 United States	Electronic Service		No	23-151Official
201	Peder	Mewis	pmewis@cleangridalliance.org	Clean Grid Alliance		570 Asbury St. St. Paul MN, 55104 United States	Electronic Service		No	23-151Official
202	Joseph	Meyer	joseph.meyer@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	Bremer Tower, Suite 1400 445 Minnesota Street St Paul MN, 55101-2131 United States	Electronic Service		No	23-151Official
203	Valentina	Mgeni	valentina.mgeni@piic.org	Prairie Island Indian Community		Prairie Island Indian Community 5636 Sturgeon Lake Road Welch MN, 55089 United States	Electronic Service		No	23-151Official
204	Cole W.	Miller	cole.miller@shakopeedakota.org	Shakopee Mdewakanton Sioux Community		Shakopee Mdewakanton Sioux Community 2330 Sioux Trail NW Prior Lake MN, 55372 United States	Electronic Service		No	23-151Official
205	Stacy	Miller	stacy.miller@minneapolismn.gov	City of Minneapolis		350 S. 5th Street Room M 301 Minneapolis MN, 55415 United States	Electronic Service		No	23-151Official
206	David	Moeller	dmoeller@allete.com	Minnesota Power			Electronic Service		No	23-151Official
207	Dalene	Monsebroten	dalene.monsebroten@nmpagency.com	Northern Municipal Power Agency		123 2nd St W Thief River Falls MN, 56701 United States	Electronic Service		No	23-151Official
208	Sarah	Mooradian	sarah@curemn.org	CURE		117 South 1st Street Montevideo MN, 56265 United States	Electronic Service		No	23-151Official
209	Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP		33 South Sixth St Ste 4200 Minneapolis MN, 55402 United States	Electronic Service		No	23-151Official
210	Travis	Morrison	travis.morrison@boisforte-nsn.gov	Bois Forte Band of Chippewa		Bois Forte Tribal Government 5344 Lakeshore Drive Nett Lake MN, 55772 United States	Electronic Service		No	23-151Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
211	David	Morrison, Sr.	david.morrison@boisforte-nsn.gov	Bois Forte Band of Chippewa		Bois Forte Tribal Government 5344 Lakeshore Drive Nett Lake MN, 55772 United States	Electronic Service		No	23-151Official
212	Evan	Mulholland	emulholland@mncenter.org	Minnesota Center for Environmental Advocacy		1919 University Ave W Ste 515 Saint Paul MN, 55101 United States	Electronic Service		No	23-151Official
213	Alan	Muller	alan@greendel.org	Energy & Environmental Consulting		1110 West Avenue Red Wing MN, 55066 United States	Electronic Service		No	23-151Official
214	Sonny	Myers	smyers@1854treatyauthority.org	1854 Treaty Authority		4428 Haines Rd Duluth MN, 55811-1524 United States	Electronic Service		No	23-151Official
215	Ben	Nelson	benn@cmpasgroup.org	CMMPA		459 South Grove Street Blue Earth MN, 56013 United States	Electronic Service		No	23-151Official
216	Carl	Nelson	cnelson@mncee.org	Center for Energy and Environment		212 3rd Ave N Ste 560 Minneapolis MN, 55401 United States	Electronic Service		No	23-151Official
217	Deb	Nelson	dnelson@greenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	23-151Official
218	David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency		220 South Sixth Street Suite 1300 Minneapolis MN, 55402 United States	Electronic Service		No	23-151Official
219	Duane	Ninneman	duane@cureriver.org	Clean Up the River Environment		117 South 1st St Montevideo MN, 56265 United States	Electronic Service		No	23-151Official
220	Michael	Noble	noble@fresh-energy.org	Fresh Energy		408 Saint Peter St Ste 350 Saint Paul MN, 55102 United States	Electronic Service		No	23-151Official
221	Rolf	Nordstrom	rnordstrom@gpsid.net	Great Plains Institute		2801 21ST AVE S STE 220 Minneapolis MN, 55407-1229 United States	Electronic Service		No	23-151Official
222	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	23-151Official
223	M. William	O'Brien	bobrien@mojlaw.com	Miller O'Brien Jensen, P.A.		120 S 6th St Ste 2400 Minneapolis MN, 55402 United States	Electronic Service		No	23-151Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
224	Ric	O'Connell	ric@gridlab.org	GridLab		2120 University Ave Berkeley CA, 94704 United States	Electronic Service		No	23-151Official
225	Joseph	OBrien	joey.obrien@lowersioux.com			39527 Highway 1 Morton MN, 56270 United States	Electronic Service		No	23-151Official
226	Matthew	Olsen	molsen@otpc.com	Otter Tail Power Company		215 South Cascade Street Fergus Falls MN, 56537 United States	Electronic Service		No	23-151Official
227	Russell	Olson	rolson@hcpd.com	Heartland Consumers Power District		PO Box 248 Madison SD, 57042-0248 United States	Electronic Service		No	23-151Official
228	Debra	Opatz	dopatz@otpc.com	Otter Tail Power Company		215 South Cascade Street Fergus Falls MN, 56537 United States	Electronic Service		No	23-151Official
229	Mikayla	Osterman	mosterman@otpc.com	Otter Tail Power Company		215 S Cascade St PO Box 496 Fergus Falls MN, 56537 United States	Electronic Service		No	23-151Official
230	Jamie	Overgaard	jovergaard@minnkota.com	Minnkota Power Cooperative, Inc.		5301 32nd Ave S Grand Forks ND, 58201 United States	Electronic Service		No	23-151Official
231	Carol A.	Overland	overland@legalectric.org	Legalelectric - Overland Law Office		1110 West Avenue Red Wing MN, 55066 United States	Electronic Service		No	23-151Official
232	Gregory	Padden	gpadden@greenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	23-151Official
233	Jessica	Palmer Denig	jessica.palmer-denig@state.mn.us		Office of Administrative Hearings	600 Robert St N PO Box 64620 St. Paul MN, 55164 United States	Electronic Service		No	23-151Official
234	Marsha	Parlow	mparlow@greenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	23-151Official
235	Priti	Patel	ppatel@greenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369-4718 United States	Electronic Service		No	23-151Official
236	Gerad	Paul	gpaul@minnkota.com	Minnkota Power Cooperative		5301 32nd Ave S Grand Forks ND, 58201 United States	Electronic Service		No	23-151Official
237	Earl	Pendleton	earl.pendleton@lowersioux.com	Lower Sioux Indian Community		39527 Highway 1 Morton MN, 56270 United States	Electronic Service		No	23-151Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
238	Mary Beth	Peranteau	mperanteau@fredlaw.com	Fredrikson & Byron, P.A.		44 East Mifflin Street Suite 1000 Madison WI, 53703 United States	Electronic Service		No	23-151Official
239	Thom	Petersen	thom.petersen@state.mn.us		Minnesota Department of Agriculture	625 North Robert St Saint Paul MN, 55155 United States	Electronic Service		No	23-151Official
240	Luke	Peterson	luke.peterson@hpuc.com	Hibbing Public Utilities Commission		1902 Sixth Ave E Hibbing MN, 55746 United States	Electronic Service		No	23-151Official
241	Neil	Peterson	info@nclucb.org	Northern Counties Land Use Coordinating Board		null null, null United States	Electronic Service		No	23-151Official
242	Gordon	Pietsch	gpietsch@greenergy.com	Great River Energy		12300 Elm Creek Blvd. Maple Grove MN, 55369-4718 United States	Electronic Service		No	23-151Official
243	Joe	Plumer	joe.plumer@redlakenation.org	Red Lake Nation		15484 Migizi Drive Red Lake MN, 56671 United States	Electronic Service		No	23-151Official
244	J.	Porter	greg.porter@nngco.com	Northern Natural Gas Company		1111 South 103rd St Omaha NE, 68124 United States	Electronic Service		No	23-151Official
245	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	23-151Official
246	Robert	Prescott	bob.prescott@lowersioux.com	Lower Sioux Indian Community		39527 Highway 1 Morton MN, 56270 United States	Electronic Service		No	23-151Official
247	David	Raatz	draatz@bepc.com	Basin Electric Power Cooperative		1717 East Interstate Avenue Bismarck ND, 58501 United States	Electronic Service		No	23-151Official
248	John C.	Reinhardt		Laura A. Reinhardt		3552 26th Ave S Minneapolis MN, 55406 United States	Paper Service		No	23-151Official
249	Victoria	Reinhardt	victoria.reinhardt@co.ramsey.mn.us	Partnership on Waste and Energy		Ramsey County Board Office 15 W. Kellogg Blvd., Ste. 220 St. Paul MN, 55102 United States	Electronic Service		No	23-151Official
250	Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	1400 BRM Tower 445 Minnesota St St. Paul MN, 55101-2131 United States	Electronic Service		Yes	23-151Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
251	Kevin	Reuther	kreuther@mncenter.org	MN Center for Environmental Advocacy		26 E Exchange St, Ste 206 St. Paul MN, 55101-1667 United States	Electronic Service		No	23-151Official
252	John	Richards	johnrichards@nweco.com	Northwestern Wisconsin Electric Company		104 S. Pine St. Grantsburg WI, 54840 United States	Electronic Service		No	23-151Official
253	Susan	Romans	sromans@allete.com	Minnesota Power		30 West Superior Street Legal Dept Duulth MN, 55802 United States	Electronic Service		No	23-151Official
254	Stephan	Roos	stephan.roos@state.mn.us		Minnesota Department of Agriculture	625 Robert St N Saint Paul MN, 55155-2538 United States	Electronic Service		No	23-151Official
255	Alan	Roy	alan.roy@whiteearth-nsn.gov	White Earth Nation		White Earth Tribal Headquarters 35500 Eagle View Road Ogema MN, 56569 United States	Electronic Service		No	23-151Official
256	Bill	Rudnicki	bill.rudnicki@shakopeedakota.org	Shakopee Mdewakanton Sioux Community		Shakopee Mdewakanton Sioux Community 2330 Sioux Trail NW Prior Lake MN, 55372 United States	Electronic Service		No	23-151Official
257	Nathaniel	Runke	nrunke@local49.org			611 28th St. NW Rochester MN, 55901 United States	Electronic Service		No	23-151Official
258	Zachary	Ruzycki	zruzycki@grenergy.com	Great River Energy		12300 Elm Creek Boulevard Maple Grove MN, 55369 United States	Electronic Service		No	23-151Official
259	Robert K.	Sahr	bsahr@eastriver.coop	East River Electric Power Cooperative		P.O. Box 227 Madison SD, 57042 United States	Electronic Service		No	23-151Official
260	Todd	Sailer		Minnetonka Power Cooperative		5301 32nd Ave. S Grand Forks ND, 58201 United States	Paper Service		No	23-151Official
261	Miranda	Sam	miranda.sam@lowersioux.com	Lower Sioux Indian Community		39527 Reservation Highway 1 PO Box 308 Morton MN, 56270 United States	Electronic Service		No	23-151Official
262	Joseph L	Sathe	jsathe@kennedy-graven.com	Kennedy & Graven, Chartered		150 S 5th St Ste 700 Minneapolis MN, 55402 United States	Electronic Service		No	23-151Official
263	Adam	Savariego	adams@uppersiouxcommunity-nsn.gov	Upper Sioux Community		5722 Travers Lane PO Box 147 Granite Falls	Electronic Service		No	23-151Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						MN, 56241 United States				
264	John	Saxhaug	john_saxhaug@yahoo.com			3940 Harriet Ave Minneapolis MN, 55409 United States	Electronic Service		No	23-151Official
265	Jean	Schafer	jeans@bepc.com	Basin Electric Power Cooperative		1717 E Interstate Ave Bismarck ND, 58501 United States	Electronic Service		No	23-151Official
266	Jeff	Schneider	jeff.schneider@ci.red-wing.mn.us	City of Red Wing		315 West 4th Street Red Wing MN, 55066 United States	Electronic Service		No	23-151Official
267	Kay	Schraeder	kschraeder@minnkota.com	Minnkota Power		5301 32nd Ave S Grand Forks ND, 58201 United States	Electronic Service		No	23-151Official
268	Kathleen	Schuler	keschuler47@gmail.com			1520 10th Ave S #2 Minneapolis MN, 55404 United States	Electronic Service		No	23-151Official
269	Robert H.	Schulte	rhs@schulteassociates.com	Schulte Associates LLC		1742 Patriot Rd Northfield MN, 55057 United States	Electronic Service		No	23-151Official
270	J.P.	Schumacher	jps@mrenergy.com	Missouri River Energy Services		null null, null United States	Electronic Service		No	23-151Official
271	Kevin	Schumacher	kevin@mrets.org	Midwest Renewable Energy Tracking System		null null, null United States	Electronic Service		No	23-151Official
272	Ronald J.	Schwartau	rschwartau@noblesce.com	Nobles Electric Cooperative		22636 U.S. Hwy. 59 Worthington MN, 56187 United States	Electronic Service		No	23-151Official
273	Douglas	Seaton	doug.seaton@umwlc.org	Upper Midwest Law Center		8421 Wayzata Blvd Ste 300 Golden Valley MN, 55426 United States	Electronic Service		No	23-151Official
274	Dean	Sedgwick	sedgwick@itascapower.com	Itasca Power Company		PO Box 455 Spring Lake MN, 56680 United States	Electronic Service		No	23-151Official
275	Jessie	Seim	jessie.seim@piic.org	Prairie Island Indian Community		5636 Sturgeon Lake Rd Welch MN, 55089 United States	Electronic Service		No	23-151Official
276	Darrell	Seki, Sr.	dseki@redlakenation.org			15484 Migizi Drive Red Lake MN, 56671 United States	Electronic Service		No	23-151Official
277	Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates		7400 Lyndale Ave S Ste 190 Richfield MN, 55423 United States	Electronic Service		Yes	23-151Official
278	Bria	Shea	bria.e.shea@xcelenergy.com	Xcel Energy		414 Nicollet Mall Minneapolis MN, 55401 United States	Electronic Service		No	23-151Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
279	Andrew R.	Shedlock	andrew.shedlock@kutakrock.com	Kutak Rock LLP		60 South Sixth St Ste 3400 Minneapolis MN, 55402-4018 United States	Electronic Service		No	23-151Official
280	Doug	Shoemaker	dougs@charter.net	Minnesota Renewable Energy		2928 5th Ave S Minneapolis MN, 55408 United States	Electronic Service		No	23-151Official
281	Beth	Smith	bsmith@greatermankato.com	Greater Mankato Growth		1961 Premier Dr Ste 100 Mankato MN, 56001 United States	Electronic Service		No	23-151Official
282	Joel	Smith	jsmith@mnchippewatribe.org	Minnesota Chippewa Tribe		PO Box 217 Cass Lake MN, 56633 United States	Electronic Service		No	23-151Official
283	Joshua	Smith	joshua.smith@sierraclub.org			85 Second St FL 2 San Francisco CA, 94105 United States	Electronic Service		No	23-151Official
284	Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.		76 W Kellogg Blvd St. Paul MN, 55102 United States	Electronic Service		No	23-151Official
285	Nizhoni	Smith	nizhoni.smith@lowersioux.com	Lower Sioux Indian Community		PO Box 308 39527 Reservation Highway 1 Morton MN, 56270 United States	Electronic Service		No	23-151Official
286	Trevor	Smith	trevor.smith@avantenergy.com	Avant Energy, Inc.		220 South Sixth Street Suite 1300 Minneapolis MN, 55402 United States	Electronic Service		No	23-151Official
287	Roger	Smith, Sr.	rogermsmithsr@fdrez.com			1720 Big Lake Road Cloquet MN, 55720 United States	Electronic Service		No	23-151Official
288	Beth	Soholt	bsoholt@cleangridalliance.org	Clean Grid Alliance		570 Asbury Street Suite 201 St. Paul MN, 55104 United States	Electronic Service		No	23-151Official
289	Anna	Sommer	asommer@energyfuturesgroup.com	Energy Futures Group		PO Box 692 Canton NY, 13617 United States	Electronic Service		No	23-151Official
290	Marie	Spry	mariespry@grandportage.com			PO Box 428 Grand Portage MN, 55605 United States	Electronic Service		No	23-151Official
291	Mark	Spurr	mspurr@fvbenergy.com	International District Energy Association		222 South Ninth St., Suite 825 Minneapolis MN, 55402 United States	Electronic Service		No	23-151Official
292	LeRoy	Staples Fairbanks III	leroy.fairbanks@llojibwe.net	Leech Lake Band of Ojibwe		190 Sailstar Drive NW Cass Lake MN, 56633 United States	Electronic Service		No	23-151Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
293	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	23-151Official
294	Byron E.	Starns	byron.starns@stinson.com	STINSON LLP		50 S 6th St Ste 2600 Minneapolis MN, 55402 United States	Electronic Service		No	23-151Official
295	Cary	Stephenson	cstephenson@otpc.com	Otter Tail Power Company		215 South Cascade Street Fergus Falls MN, 56537 United States	Electronic Service		Yes	23-151Official
296	Mark	Strohfus	mstrohfus@greenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	23-151Official
297	Samuel	Strong	sam.strong@redlakenation.org	Red Lake Nation		15484 Migizi Drive Red Lake MN, 56671 United States	Electronic Service		No	23-151Official
298	Kent	Sulem	ksulem@mmua.org			3131 Fernbrook Ln N Ste 200 Plymouth MN, 55447-5337 United States	Electronic Service		No	23-151Official
299	Timothy	Sullivan	tsullivan@whe.org	Wright Hennepin Coop. Electric Assn.		6800 Electric Drive PO Box 330 Rockford MN, 55373 United States	Electronic Service		No	23-151Official
300	David	Sunderman	daves@benco.org	BENCO (DUPLICATE)		PO Box 8 Mankato MN, 56002-0008 United States	Electronic Service		No	23-151Official
301	Jeremy	Sutton	jb.sutton@smmpa.org	Southern MN Municipal Power Agency			Electronic Service		No	23-151Official
302	Randy	Synsteliën	rsynsteliën@otpc.com	Otter Tail Power Company		215 S Cascade St Fergus Falls MN, 56537 United States	Electronic Service		No	23-151Official
303	Camille	Tanhoff	kamip@uppersiouxcommunity-nsn.gov	Upper Sioux Community		5722 Travers Lane PO BOX 147 Granite Falls MN, 56241 United States	Electronic Service		No	23-151Official
304	Mikayala	Thompson	mmthompson@otpc.com	Otter Tail Power Company		null null, null United States	Electronic Service		No	23-151Official
305	Tim	Thompson	tthompson@lrec.coop	Lake Region Electric Cooperative		PO Box 643 1401 South Broadway Pelican Rapids MN, 56572 United States	Electronic Service		No	23-151Official
306	Stuart	Tommerdahl	stommerdahl@otpc.com	Otter Tail Power Company		215 S Cascade St PO Box 496 Fergus Falls MN, 56537 United States	Electronic Service		Yes	23-151Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
307	Pat	Treseler	pat.jcplaw@comcast.net	Paulson Law Office LTD		4445 W 77th Street Suite 224 Edina MN, 55435 United States	Electronic Service		No	23-151Official
308	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	23-151Official
309	Caralyn	Trutna	carrie@uppersiouxcommunity-nsn.gov	Upper Sioux Community		Upper Sioux Community P.O. Box 147 Granite Falls MN, 55372 United States	Electronic Service		No	23-151Official
310	Jackie	Van Norman	jvannorman@grenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	23-151Official
311	Analeisha	Vang	avang@mnpower.com			30 W Superior St Duluth MN, 55802-2093 United States	Electronic Service		Yes	23-151Official
312	Adrian	Varga	avarga@actcommodities.com	ACT Commodities		437 Madison Ave New York City NY, 10022 United States	Electronic Service		No	23-151Official
313	Sam	Villella	sdvillella@gmail.com			10534 Alamo Street NE Blaine MN, 55449 United States	Electronic Service		No	23-151Official
314	Julie	Voeck	julie.voeck@nee.com	NextEra Energy Resources, LLC		700 Universe Blvd Juno Beach FL, 33408 United States	Electronic Service		No	23-151Official
315	Amelia	Vohs	avohs@mncenter.org	Minnesota Center for Environmental Advocacy		1919 University Avenue West Suite 515 St. Paul MN, 55104 United States	Electronic Service		Yes	23-151Official
316	Michael	Volker	mvolker@eastriver.coop	East River Electric Power Coop		211 S. Harth Ave Madison SD, 57042 United States	Electronic Service		No	23-151Official
317	Toni	Volkmeier	toni.volkmeier@state.mn.us	MPCA		520 Lafayette Rd. N. St. Paul MN, 55155 United States	Electronic Service		No	23-151Official
318	Trent	Waite	twait@grenergy.com			null null, null United States	Electronic Service		No	23-151Official
319	Laurance R	Waldoch	larrywaldoch@gmail.com	Attorney		2597 Parkview Dr Saint Paul MN, 55110 United States	Electronic Service		No	23-151Official
320	Greg	Wannier	greg.wannier@sierraclub.org	Sierra Club		2101 Webster St Ste 1300 Oakland CA, 94612 United States	Electronic Service		No	23-151Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
321	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	23-151Official
322	Cynthia	Warzecha	cynthia.warzecha@state.mn.us	Minnesota Department of Natural Resources		500 Lafayette Road Box 25 St. Paul MN, 55155-4040 United States	Electronic Service		No	23-151Official
323	Elizabeth	Wefel	eawefel@flaherty-hood.com	Missouri River Energy Services		525 Park St Ste 470 Saint Paul MN, 55103 United States	Electronic Service		No	23-151Official
324	Carol	Westergard	cwestergard@otpc.com	Otter Tail Power Company		215 S Cascade St Fergus Falls MN, 56537 United States	Electronic Service		No	23-151Official
325	Heather	Westra	heather.westra@piic.org	Prairie Island Indian Community		5636 Sturgeon Lake Rd Welch MN, 55089 United States	Electronic Service		No	23-151Official
326	Paul	White	paul.white@prcwind.com	Project Resources Corp./Tamarac Line LLC/Ridgewind		618 2nd Ave SE Minneapolis MN, 55414 United States	Electronic Service		No	23-151Official
327	Steve	White	steve.white@llojibwe.net	Leech Lake Band of Ojibwe		190 Sailstar Drive NW Cass Lake MN, 56633 United States	Electronic Service		No	23-151Official
328	Cody	Whitebear	cody.whitebear@piic.org	Prairie Island Indian Community		5636 Sturgeon Lake Road Welch MN, 55089 United States	Electronic Service		No	23-151Official
329	John	Williams	jwilliams@greenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	23-151Official
330	Laurie	Williams	laurie.williams@sierraclub.org	Sierra Club		Environmental Law Program 1536 Wynkoop St Ste 200 Denver CO, 80202 United States	Electronic Service		No	23-151Official
331	Virgil	Wind	virgil.wind@millelacsband.com	Mille Lacs Band of Ojibwe		43408 Oodena Drive Onamia MN, 56359 United States	Electronic Service		No	23-151Official
332	Joseph	Windler	jwindler@winthrop.com	Winthrop & Weinstine		225 South Sixth Street, Suite 3500 Minneapolis MN, 55402 United States	Electronic Service		No	23-151Official
333	Robyn	Woeste	robynwoeste@alliantenergy.com	Interstate Power and Light Company		200 First St SE Cedar Rapids IA, 52401 United States	Electronic Service		No	23-151Official
334	Sara	Wolff	sara@mnipl.org			710 Linwood Avenue St Paul MN,	Electronic Service		No	23-151Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						55105 United States				
335	Tim	Wulling	t.wulling@earthlink.net			1495 Raymond Ave. Saint Paul MN, 55108 United States	Electronic Service		No	23- 151Official
336	Laurie	York	laurie.york@whiteearth-nsn.gov	White Earth Reservation Business Committee		PO Box 418 White Earth MN, 56591 United States	Electronic Service		No	23- 151Official
337	Kurt	Zimmerman	kwz@ibew160.org	Local Union #160, IBEW		2909 Anthony Ln St Anthony Village MN, 55418-3238 United States	Electronic Service		No	23- 151Official
338	Emily	Ziring	eziring@stlouispark.org	City of St. Louis Park		5005 Minnetonka Blvd St. Louis Park MN, 55416 United States	Electronic Service		No	23- 151Official
339	Patrick	Zomer	pat.zomer@lawmoss.com	Moss & Barnett PA		150 S 5th St #1200 Minneapolis MN, 55402 United States	Electronic Service		No	23- 151Official