

January 2, 2018

Daniel P. Wolf  
Executive Secretary  
Minnesota Public Utilities Commission  
121 7<sup>th</sup> Place East, Suite 350  
St. Paul, Minnesota 55101-2147

RE: **Comments of the Minnesota Department of Commerce, Division of Energy Resources**  
Docket No. E999/M-17-377

Dear Mr. Wolf:

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

2016 Biennial Transmission Projects Report.

The petition was filed on November 1, 2017, by the Minnesota Transmission Owners (American Transmission Company, LLC; Dairyland Power Cooperative; East River Electric Power Cooperative; Great River Energy; Hutchinson Utilities Commission; ITC Midwest LLC; L&O Power Cooperative; Marshall Municipal Utilities; Minnesota Power; Minnkota Power Cooperative; Missouri River Energy Services; Northern States Power Company; Otter Tail Power Company; Rochester Public Utilities; Southern Minnesota Municipal Power Agency; and Willmar Municipal Utilities).

The Department recommends **approval with reporting requirements**. The Department is available to answer any questions the Minnesota Public Utilities Commission may have.

Sincerely,

/s/ MICHAEL N. ZAJICEK  
Rates Analyst

MNZ/ja  
Attachment

## Before the Minnesota Public Utilities Commission

---

### Comments of the Minnesota Department of Commerce Division of Energy Resources

*Docket No. E999/M-17-377*

#### I. INTRODUCTION

On November 1, 2017 the Minnesota Transmission Owners (MTO) submitted to the Minnesota Public Utilities Commission (Commission) the MTO's *2017 Biennial Transmission Projects Report* (Report). The MTO is a coalition of sixteen electric utilities that own or operate high voltage transmission facilities in Minnesota.<sup>1</sup> The Report provides a review of the MTO's transmission planning activities. Northwestern Wisconsin Electric Company (NWECC) did not file a biennial transmission report.<sup>2</sup>

The Report does not seek certification of any high voltage transmission line. Therefore, pursuant to Minnesota Rules 7848.1800, subpart 3 and the Commission's November 9, 2017 *Notice of Comment Periods and Deadlines*, comments on the Report's compliance with the filing requirements (Minnesota Rules 7848.1300) and procedural recommendations were due November 21, 2017 with initial comments on the merits of the report due January 15, 2018, with reply comments due March 1, 2018. The Minnesota Department of Commerce, Division of Energy Resources (Department) notes that petitions to intervene<sup>3</sup> and comments on the merits,<sup>4</sup> including any procedural recommendation,<sup>5</sup> are to be submitted by January 15, 2018.<sup>6</sup>

On November 14, 2017, comments on compliance with the filing requirements were filed by the Department. The MTO filed supplemental data November 21, 2017 in response to the Department's comments.

---

<sup>1</sup> The members of the MTO are: American Transmission Company, LLC; Dairyland Power Cooperative; East River Electric Power Cooperative; Great River Energy (GRE); Hutchinson Utilities Commission; ITC Midwest LLC; L&O Power Cooperative; Marshall Municipal Utilities; Minnesota Power; Minnkota Power Cooperative; Missouri River Energy Services; Northern States Power Company d/b/a Xcel Energy (Xcel); Otter Tail Power Company; Rochester Public Utilities; Southern Minnesota Municipal Power Agency; and Willmar Municipal Utilities.

<sup>2</sup> On October 22, 2009 Northwestern Wisconsin Electric Company (NWECC) filed NWECC's *Transmission Projects Biennial Report (TPBR)*. The TPBR states "NWECC owns approximately three miles of 69kV transmission line and a portion of a 230kV substation."

<sup>3</sup> Minnesota Rules 7848.1900, subpart 4.

<sup>4</sup> Minnesota Rules 7848.1900, subpart 5.

<sup>5</sup> Minnesota Rules 7848.1900, subpart 6.

<sup>6</sup> Minnesota Rules 7848.1800, subpart 5.

Below are the comments of the Department on the merits of the Report.

## **II. ANALYSIS OF PLANNING ACTIVITIES**

### **A. NWEC**

NWEC did not submit a biennial transmission plan. Given the limited nature of NWEC's Minnesota transmission system as referenced in footnote 2, the Department has no comments regarding NWEC.

### **B. The MTO**

#### **1. Existing Transmission Issues**

The first step in maintaining a reliable transmission system is to address areas where the current transmission system cannot provide reliable service. Department Information Request No. 1 requested the MTO to list the areas where historical demand had been greater than the supply capability after a single contingency occurs. In response, the MTO listed 10 areas as follows:

1. 2017-TC-N6 – Plymouth-Area Power Upgrade
2. 2011-SE-N5 - Arlington-Green Isle 69 kV
3. 2015-SE-N4 - Line 0714 Rebuild
4. 2011-NE-N2 - 15 Line Upgrade
5. 2015-NE-N1 - 5 Line Upgrade
6. 2015-NE-N2 - 868 Line Upgrade
7. 2015-NE-N14 - 83 Line Upgrade
8. 2015-NE-N15 - 95 Line Upgrade
9. 2013-SW-N1 - Heron Lake Capacitors
10. 2017-SE-N4 – Walters 161/69 kV Substation Expansion

In the list above, the year indicates when the issue first arose in the biennial plan. Department Information Request No. 1 also requested the MTO to provide an estimated date by which reliability would be restored to each of the above areas. In response, the MTO indicated that reliability would be restored as follows:

- 2017: 1 issue completed (2015-NE-N15)
- 2018: 2 issues (2011-NE-N2 and 2017-SE-N4)
- 2019: 3 issues (2015-NE-N1, 2015-NE-N2, and 2015-SE-N4)
- 2020: 1 issue (2017-TC-N6)

- 2023: 1 issue (2011-SE-N5)
- After 2022: 1 issue (2013-SW-N1)
- 1 issue is being monitored to determine if it is still necessary to resolve given other completed projects (2015-NE-N14).

As indicated in the Department’s comments in prior transmission planning dockets, the Department expects that transmission deficiencies will exist for a variety of reasons that are beyond the MTO members’ control. As reported by the MTO, six of the ten issues will be fixed within the next two years (by year-end 2019).

*2. Forecasted Transmission Issues*

An early step in addressing forecasted inadequacies is to obtain the necessary permits. In order to monitor the MTO’s progress in terms of obtaining necessary permits, Department Information Request No. 2 requested the MTO to provide a schedule with estimated dates for the submission of certificate of need (CN) applications for situations in which the MTO has a potential solution and that potential solution may require a CN. The MTO’s response is summarized below in Table 1. Table 1 shows the schedule of estimated filing dates for CN applications for future projects. Some projects reported by the MTO are dependent upon CNs already under review or already approved by the Commission. These projects are not included in Table 1.

**Table 1: Schedule of Certificates of Need**

<b>Tracking Number</b>	<b>Project</b>	<b>Estimated Filing Date</b>	<b>Responding Utility</b>
2017-SE-N1	Huntley to Wilmarth 345 kV MEP Project	2018	Xcel and ITC Midwest
2007-NW-N3	Winger-Thief River Falls 230 kV	August 2019	OTP
2015-NW-N1	Clearbrook West 115 kV-Bagley West 230 kV	January 2022	OTP

Several projects were reported as potentially requiring a CN but not yet having a filing date estimated. These projects are shown in Table 2 below.

**Table 2: Potential Certificates of Need**

Tracking Number	Project	Estimated Filing Date	Responding Utility
2003-WC-N7	Panther Area	2021 – Need based on area load growth	GRE
2007-NE-N1	Duluth Area 230 kV	Early 2020s depending on future studies	MP
2015-NE-N12	Iron Range-Arrowhead 245 kV Project	No current need to construct the project	MP

The Department briefly reviewed the MTO's discussion for the projects listed in Table 2. The table shows that there are relatively few projects planned at this time that potentially require CNs where the timeline is not yet known. The Department has no concerns with any of these projects or their estimated CN filing dates.

In response to an information request<sup>7</sup> by the Department, the MTO stated that two other projects may require a Certificate of Need in the future depending on load growth and storm damage. The MTO stated that they are currently evaluating these projects further. Table 3 below lists these projects:

**Table 3: Projects Under Evaluation for Certificates of Need**

Tracking Number	Project	Responding Utility
2009-WC-N6	Elk River-Becker Area	GRE
2017-WC-N5	DS Line Rebuild Project	GRE

The Department has no concerns with these projects at this time.

### C. TRANSMISSION FOR RENEWABLES

The Report also contains a section regarding Minnesota's Renewable Energy Standard (RES Report) in compliance with Minnesota Statutes §216B.2425, subd. 7. The RES Report is a joint effort separate from that of the MTO but containing many of the same utilities.<sup>8</sup> Minnesota Statutes §216B.2425, subd. 7 governing the RES Report states:

<sup>7</sup> See Department Attachment 1.

<sup>8</sup> The utilities sponsoring the RES Report are: Minnesota Power, Northern States Power Company, Otter Tail Power Company, Dairyland Power Cooperative, Basin Electric Power Cooperative, East River Electric Power Cooperative, Great River Energy, L&O Power Cooperative, Minnkota Power Cooperative, Central Minnesota Municipal Power Agency, Minnesota Municipal Power Agency, Southern Minnesota Municipal Power Agency, Western Minnesota

Each entity subject to this section shall determine necessary transmission upgrades to support development of renewable energy resources required to meet objectives under section 216B.1691 and shall include those upgrades in its report under subdivision 2.

In compliance with this statute, the RES Report starts with a gap analysis which provides “an estimate of how many more megawatts of renewable generating capacity a utility expects to need beyond what is presently available to obtain the required amount of renewable energy.” The RES Report shows that utilities subject to the Minnesota RES have sufficient capacity acquired to meet the Minnesota RES needs through 2025. According to the chart on page 147 of the Report, the Minnesota RES utilities also have enough capacity to meet the RES needs of other jurisdictions as well as Minnesota’s RES needs through 2025. Thus it appears that significant additional transmission investment for the purposes of the RES is not required in the near future.

The RES Utilities note that, in its May 18, 2012 Order, the Commission directed the MTO to provide an update on the Corridor Upgrade Project. The Corridor Upgrade Project is an upgrade of the 230-kV line between the Hazel Creek Substation near Granite Falls, Minnesota, and the Blue Lake Substation in Shakopee, Minnesota to a double circuit 345-kV system. The Corridor Upgrade Project would provide significant new transmission capacity from the Dakotas, southwestern Minnesota and western Minnesota to the Twin Cities, at a cost estimated in 2009 to be approximately \$350 million. As a result of the May 12, 2014 Order approving the 2013 Biennial Transmission Report, the Commission recognized that the schedule for the Corridor Upgrade Project has likely moved out beyond 2018 and did not require the utilities to report on the status of the project in the 2015 Report. The Commission similarly did not require the MTO to report on the status of the Corridor Upgrade Project in its 2017 Report in its May 27, 2016 Order approving the 2015 Biennial Transmission Report.

The Department requests that the MTO provide in reply comments a discussion on the current status of the Corridor Upgrade Project, its schedule, and whether further discussion of the project would be useful in the next 2019 Biennial Transmission Report.

#### *D. SOLAR ENERGY STANDARD*

In 2013, the Minnesota Legislature established a solar energy standard (SES) for public utilities, effective by the end of 2020. Minn. Laws 2013, Ch. 85, § 3, codified at Minnesota Statutes § 216B.1691, subd. 2f (Solar energy standard), establish a solar energy standard at 1.5 percent of a utility’s retail sales by the end of 2020.

That statute requires public utilities subject to the SES to report to the Commission on July 1, 2014, and each July thereafter, on progress in achieving the standard. The first reports were filed with the Commission in May and June of 2014, and accepted in an Order dated October 23, 2014.<sup>9</sup> The second set of reports were filed in the summer of 2015 and were approved by the Commission in an October 28, 2015 Order.<sup>10</sup> The third set of reports were filed in the summer of 2016 and were approved by the Commission in its November 28, 2016 Order.<sup>11</sup> The fourth set of reports were filed in the summer of 2017 and were approved by the Commission in its October 20, 2017 Order.<sup>12</sup> More information is provided on the utilities' progress toward meeting the upcoming SES in those dockets. The MTO briefly discussed the SES in the Report and presented data that indicates that the MTO utilities subject to the SES are on pace to meet the 2020 and 2025 SES requirements.

#### *E. MITIGATION COSTS*

As utilities have been building more infrastructure and more significantly sized infrastructure, it has become increasingly necessary to ensure that utilities use cost discipline as they construct new resources. To encourage cost discipline and prevent ratepayers from paying more than is reasonable for new utility infrastructure, the Department and Commission have been holding utilities accountable by comparing the utilities' estimated costs of a project as proposed in a CN proceeding to the actual cost of the project requested in a rate recovery proceeding. Utilities are not allowed to recover any cost overruns through riders and at a minimum, must justify in a general rate case any cost recovery above the amount the utility originally indicated that the project would cost. This requirement is an important tool to ensure that cost discipline is maintained throughout the regulatory process. The presence of cost discipline is important to ensure the accuracy of cost estimates used in planning proceedings such as resource plans and the biennial transmission plan. Such cost estimates are used to make significant decisions so it is important to minimize errors in estimation to avoid poor decisions and higher system costs.

Due to significant additions in infrastructure expected now and in the future, the Department concludes that additional measures are necessary to help ensure that costs charged to ratepayers for upgrades to the electric system are reasonable. Further, it is important to ensure that decisions made by a utility in response to local governments reasonably consider cost implications, and that costs of upgrades are allocated appropriately to ratepayers, based on ratemaking principles such as cost-causation, cost minimization and administrative feasibility. When utilities install infrastructure in an area, there are always mitigation measures involved. So long as the costs of such measures are reasonable, prudent and relatively small in

---

<sup>9</sup> Docket No. E999/M-14-321

<sup>10</sup> Docket No. E999/M-15-462

<sup>11</sup> Docket No. E999-M-16-342

<sup>12</sup> Docket No. E999-M-17-283

size, it is generally reasonable to allow the costs to be borne by all ratepayers.<sup>13</sup> However, when a mitigation measure is not needed for electrical purposes and is significant in size, it is important to consider whether the costs should be allocated to the entire rate base or to a smaller group of customers, based on the entity requesting such enhancement or optional mitigation. An example of such a mitigation measure is undergrounding transmission facilities for aesthetic reasons. Because such options increase costs not only of installation but also ongoing maintenance of the facilities, and because the beneficiaries of such designs can be limited to local ratepayers, careful consideration should be given to proposals to charge the incremental costs of optional undergrounding to all ratepayers. Application of cost-causation principles are important because, if such optional mitigation costs are consistently allocated to the entire rate base, the incentive to prudently control costs throughout the permitting processes is reduced.

As in previous comments on biennial transmission reports, the Department continues to recommend that the Commission require the rate-regulated electric utilities – Otter Tail Power Company, Minnesota Power, and Xcel – to provide the following information in future rate requests to recover the costs of new energy facilities:

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

This list should include data regarding mitigation measures that the utilities undertook voluntarily. Such data will enable cost allocations to be considered in ratemaking as appropriate and in a more accurate and consistent manner. The Department also notes that these recommended reporting requirements do not in any way limit the Commission's decision-making authority but instead would better inform the Commission's decision-making process.

### **III. DEPARTMENT RECOMMENDATION**

The Department recommends that the Commission accept the Report.

Additionally the Department requests that the MTO's provide in reply comments a discussion on the current status of the Corridor Upgrade Project, its schedule, and whether further discussion of the project would be useful in the next 2019 Biennial Transmission Report.

---

<sup>13</sup> It would not be administratively feasible or desirable to tailor rates in each area of Minnesota to reflect incremental costs of all optional mitigation measures in the area.



Finally, the Department recommends that the Commission require Otter Tail Power Company, Minnesota Power, and Xcel to provide the following information in future rate requests to recover the costs of new energy facilities:

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

This list should include data regarding mitigation measures that the utilities undertook voluntarily.

/ja

- Not Public Document – Not For Public Disclosure
- Public Document – Not Public (Or Privileged) Data Has Been Excised
- Public Document

Minnesota Transmission Owners

Docket No.: E999/M-17-377

Response To: Department of Commerce Information Request No. 3

Requestor: Michael Zajicek

Date Received: November 22, 2017

---

Question:

The 2017 Biennial Transmission Projects report identifies several transmission projects that either construct new 115 kV line or upgrade existing lower voltage lines to 115 kV.

For the following list of transmission projects please:

- A. Provide the length of the line to be constructed or upgrade.
- B. If the length of the line to be constructed or upgraded is over 10 miles please explain why the proposed transmission project does not require a Certificate of Need.

**Projects:**

1. 2007-NE-N6 Onigum 115 kV Conversion
2. 2015-NE-N5 16 Line Relocation
3. 2017-NE-N18 Tioga 115/23 kV Substation
4. 2009-WC-N6 Elk River-Becker Area
5. 2017-WC-N5 DS Line Rebuild Project

Response:

1. 2007-NE-N6 Onigum 115 kV Conversion (Great River Energy)
  - a. The total length of the 115 kV line will be approximately 9 miles.
  - b. N/A – line length is less than 10 miles
2. 2015-NE-N5 16 Line Relocation (Minnesota Power)
  - a. The total length of the 16 Line Relocation is approximately 3 miles. The MPUC granted a Route Permit for the 16 Line Reroute HVTL Project in January 2016 (MPUC Docket No. E015/TL-14-977).
  - b. N/A – line length is less than 10 miles
3. 2017-NE-N18 Tioga 115/23 kV Substation (Minnesota Power)

- a. The Tioga Substation will be located adjacent to an existing 115 kV tap line. The length of the extension of the existing 115 kV line to the new substation is expected to be around 1,000 feet or less.
  - b. N/A – line length is less than 10 miles
4. 2009-WC-N6 Elk River-Becker Area (Great River Energy)
- a. The total line mileage could be as much as 36.4 miles, and is being built in segments.
  - b. Construction of new 115 kV single circuit structures and rebuild with 115/69 kV double circuit structures will be phased in based on loading of the different line segments. If a large load appears on the system, a Certificate of Need may be needed.  
The line segments are as follows:

Orrock - RDF Tap	8.4
RDF Tap - Daytonport	4.1
Daytonport - Energy Park	4.2
Energy Park - Enterprise Park	1.5
Orrock - Big Lake	4.8
Big Lake - Remmele	2.4
Remmele - Thompson Lake	6.5
Thompson Lake - Liberty	4.5
5. 2017-WC-N5 DS Line Rebuild Project (Great River Energy)
- a. The line mileage could be as much as 24.7 miles.
  - b. Replacement of existing structures to 115 kV will likely will be based on storm damage and actual mileage impacted. GRE is currently seeking advice from the PUC on how to best proceed.

---

Date: December 4, 2017

Preparer: Great River Energy-Wayne Roelofs  
Title: Transmission System Planning Analyst  
Department: Transmission Planning  
Telephone: 763-445-5952

Preparer: Minnesota Power-Christian Winter  
Title: Transmission System Planning Engineer  
Department: System Performance & Transmission Planning  
Telephone: 218-355-2908

## **CERTIFICATE OF SERVICE**

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

**Minnesota Department of Commerce  
Comments**

**Docket No. E999/M-17-377**

**Dated this 2<sup>nd</sup> day of January 2018**

**/s/Sharon Ferguson**

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Christopher	Anderson	canderson@allete.com	Minnesota Power	30 W Superior St  Duluth, MN 558022191	Electronic Service	No	OFF_SL_17-377_M-17-377
James J.	Bertrand	james.bertrand@stinson.com	Stinson Leonard Street LLP	50 S 6th St Ste 2600  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_17-377_M-17-377
Derek	Bertsch	derek.bertsch@mrenergy.com	Missouri River Energy Services	3724 West Avera Drive PO Box 88920 Sioux Falls, SD 57109-8920	Electronic Service	No	OFF_SL_17-377_M-17-377
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1800  St. Paul, MN 55101	Electronic Service	No	OFF_SL_17-377_M-17-377
Carl	Cronin	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7  Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_17-377_M-17-377
Stacy	Dahl	sdahl@minnkota.com	Minnkota Power Cooperative, Inc.	1822 Mill Road PO Box 13200 Grand Forks, ND 58208-3200	Electronic Service	No	OFF_SL_17-377_M-17-377
Curt	Dieren	curt.dieren@dgr.com	L&O Power Cooperative	1302 S Union St  Rock Rapids, IA 51246	Electronic Service	No	OFF_SL_17-377_M-17-377
Ian	Dobson	Residential.Utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012130	Electronic Service	No	OFF_SL_17-377_M-17-377
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 280  Saint Paul, MN 551012198	Electronic Service	No	OFF_SL_17-377_M-17-377
Michael	Greiveldinger	MichaelGreiveldinger@alliantenergy.com	Wisconsin Power and Light	4902 North Biltmore Lane  Madison, WI 53718	Electronic Service	No	OFF_SL_17-377_M-17-377

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Kimberly	Hellwig	kimberly.hellwig@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_17-377_M-17-377
Michael	Hoppe	il23@mtn.org	Local Union 23, I.B.E.W.	932 Payne Avenue  St. Paul, MN 55130	Electronic Service	No	OFF_SL_17-377_M-17-377
Alan	Jenkins	aj@jenkinsatlaw.com	Jenkins at Law	2265 Roswell Road Suite 100 Marietta, GA 30062	Electronic Service	No	OFF_SL_17-377_M-17-377
Richard	Johnson	Rick.Johnson@lawmoss.com	Moss & Barnett	150 S. 5th Street Suite 1200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_17-377_M-17-377
Mark J.	Kaufman	mkaufman@ibewlocal949.org	IBEW Local Union 949	12908 Nicollet Avenue South  Burnsville, MN 55337	Electronic Service	No	OFF_SL_17-377_M-17-377
Colleen	Knudtson	colleenk@cmpasgroup.org	Central MN MPA	459 South Grove Street  Blue Earth, MN 56013	Electronic Service	No	OFF_SL_17-377_M-17-377
Thomas	Koehler	TGK@IBEW160.org	Local Union #160, IBEW	2909 Anthony Ln  St Anthony Village, MN 55418-3238	Electronic Service	No	OFF_SL_17-377_M-17-377
Michael	Krikava	mkrikava@briggs.com	Briggs And Morgan, P.A.	2200 IDS Center 80 S 8th St Minneapolis, MN 55402	Electronic Service	No	OFF_SL_17-377_M-17-377
Rick	Lancaster	rlancaster@greenergy.com	Great River Energy	12300 Elm Creek Blvd  Maple Grove, MN 553694718	Electronic Service	No	OFF_SL_17-377_M-17-377
Joel	Larson	jlarson@minnkota.com	Minnkota Power Cooperative, Inc.	1822 Mill Road  Grand Forks, ND 58203	Electronic Service	No	OFF_SL_17-377_M-17-377

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Douglas	Larson	dlarson@dakotaelectric.com	Dakota Electric Association	4300 220th St W  Farmington, MN 55024	Electronic Service	No	OFF_SL_17-377_M-17-377
Mike	Malone	mmalone@hcpd.com	Heartland Consumer Power District	P.O. Box 248  Madison, SD 570420248	Electronic Service	No	OFF_SL_17-377_M-17-377
Pam	Marshall	pam@energycents.org	Energy CENTS Coalition	823 7th St E  St. Paul, MN 55106	Electronic Service	No	OFF_SL_17-377_M-17-377
Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP	33 South Sixth St Ste 4200  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_17-377_M-17-377
David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency	220 South Sixth Street Suite 1300 Minneapolis, Minnesota 55402	Electronic Service	No	OFF_SL_17-377_M-17-377
Matthew	Olsen	molsen@otpc.com	Otter Tail Power Company	215 South Cascade Street  Fergus Falls, MN 56537	Electronic Service	No	OFF_SL_17-377_M-17-377
David	Raatz	draatz@bepc.com	Basin Electric Power Cooperative	1717 East Interstate Avenue  Bismarck, ND 58501	Electronic Service	No	OFF_SL_17-377_M-17-377
Craig	Rustad	crustad@minnkota.com	Minnkota Power	1822 Mill Road PO Box 13200 Grand Forks, ND 582083200	Electronic Service	No	OFF_SL_17-377_M-17-377
Laura	Sandwick	lm.sandwick@smpa.org	Southern MN Municipal Power Agency	500 1st Ave SW  Rochester, MN 55902-3303	Electronic Service	No	OFF_SL_17-377_M-17-377

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Richard	Savelkoul	rsavelkoul@martinsquires.com	Martin & Squires, P.A.	332 Minnesota Street Ste W2750  St. Paul, MN 55101	Electronic Service	No	OFF_SL_17-377_M-17-377
William E.	Schwandt	bschwandt@mpsutility.com	Moorhead Public Service	500 Cedar Ave PO Box 779 Moorhead, MN 565610779	Electronic Service	No	OFF_SL_17-377_M-17-377
Bria	Shea	bria.e.shea@xcelenergy.com	Xcel Energy	414 Nicollet Mall  Minneapolis, MN 55401	Electronic Service	No	OFF_SL_17-377_M-17-377
Mrg	Simon	mrgsimon@mrenergy.com	Missouri River Energy Services	3724 W. Avera Drive P.O. Box 88920 Sioux Falls, SD 571098920	Electronic Service	No	OFF_SL_17-377_M-17-377
Trevor	Smith	trevor.smith@avantenergy.com	Avant Energy, Inc.	220 South Sixth Street Suite 1300 Minneapolis, Minnesota 55402	Electronic Service	No	OFF_SL_17-377_M-17-377
Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.	76 W Kellogg Blvd  St. Paul, MN 55102	Electronic Service	No	OFF_SL_17-377_M-17-377
Byron E.	Starns	byron.starns@stinson.com	Stinson Leonard Street LLP	50 S 6th St Ste 2600  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_17-377_M-17-377
Fred	Stibor	fstibor@itctransco.com	ITC Midwest LLC	27175 Energy Way  Novi, MI 48375	Electronic Service	No	OFF_SL_17-377_M-17-377
James M.	Strommen	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered	470 U.S. Bank Plaza 200 South Sixth Street Minneapolis, MN 55402	Electronic Service	No	OFF_SL_17-377_M-17-377
Keith	Stubbendick	kas@dairynet.com	Dairyland Power Cooperative	PO Box 817  La Crosse, WI 54602-0817	Electronic Service	No	OFF_SL_17-377_M-17-377



First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Eric	Swanson	eswanson@winthrop.com	Winthrop & Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_17-377_M-17-377
Jesse	Tomford	jtomford@otpc.com	Otter Tail Power Company	215 S Cascade St PO Box 496 Fergus Falls, MN 56538-0496	Electronic Service	No	OFF_SL_17-377_M-17-377
Darryl	Tveitbakk	nmpadt@mncable.net	Northern Municipal Power Agency	123 2nd Street West  Thief River Falls, MN 56701	Electronic Service	No	OFF_SL_17-377_M-17-377
Lisa	Veith	lisa.veith@ci.stpaul.mn.us	City of St. Paul	400 City Hall and Courthouse 15 West Kellogg Blvd. St. Paul, MN 55102	Electronic Service	No	OFF_SL_17-377_M-17-377
Michael	Voelker	mvoelker@eastriver.coop	East River Electric Power Coop., Inc.	211 S Harth Ave  Madison, SD 57042	Electronic Service	No	OFF_SL_17-377_M-17-377
Jason	Weiers	jweiers@otpc.com	Otter Tail Power Company	215 South Cascade Street PO Box 496 Fergus Falls, MN 56538	Electronic Service	No	OFF_SL_17-377_M-17-377
Daniel P	Wolf	dan.wolf@state.mn.us	Public Utilities Commission	121 7th Place East Suite 350 St. Paul, MN 551012147	Electronic Service	No	OFF_SL_17-377_M-17-377