

June 4, 2026

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

RE: Reply Comments of the Minnesota Department of Commerce
Docket No. E017/M-25-141

Dear Ms. Bergman,

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

In the Matter of Otter Tail Power Company's 2025 Integrated Distribution Plan.

Otter Tail Power Company's (OTP or the Company) Integrated Distribution Plan (IDP) was filed on November 1, 2025. OTP's Transportation Electrification Plan was filed concurrently.

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

Sincerely,

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

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

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Acronyms and Abbreviations

AMI	Advanced Metering Infrastructure
BESS	Battery Energy Storage System
CAIDI	Customer Average Interruption Duration Index
DER	Distributed Energy Resource
DOE	United States Department of Energy
ECO	Energy Conservation & Optimization
EV	Electric Vehicle
FERC	Federal Energy Regulatory Commission
FLISR	Fault Location Isolation and Service Restoration
Grid Mod	Grid Modernization
IDP	Integrated Distribution Plan
IR	Information Request
IRP	Integrated Resource Plan
kV	Kilo Volt
kW	Kilowatt
kWh	Kilowatt-Hour
MP	Minnesota Power
MW	Megawatt
NWA	Non-Wire Alternative
O&M	Operations and Maintenance
OTP	Otter Tail Power Company
PUC	Public Utilities Commission
SAIDI	System Average Interruption Duration Index
SAIFI	System Average Interruption Frequency Index
TEP	Transportation Electrification Plan
Xcel	Xcel Energy



Before the Minnesota Public Utilities Commission

Comments of the Minnesota Department of Commerce

Docket No. E017/M-25-141

I. INTRODUCTION

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

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

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

II. PROCEDURAL BACKGROUND

December 8, 2022	The Commission issued its Order in Docket Nos. E002/M-21-694, E999/CI-17-879. ² The Order approved combining the filing requirements of electric utility IDPs and TEPs.
May 2023	The Minnesota Legislature established requirements for utility TEPs in 2023 Minn. Laws. ch. 60, art. 12, sec. 12, codified at Minn. Stat. § 216B.1615 – Electric Vehicle Deployment Program. Minn. Stat. § 216B.1615 requires electric utilities to file TEPs, established certain content requirements, granted the Commission authority to approve, modify or reject TEPs, and established evaluation criteria. ³

¹ *In the Matter of Distribution System Planning for Otter Tail Power Company, Order Adopting Integrated Distribution Plan Filing Requirements*, February 20, 2019, Docket No. E017/CI-18-253, (eDockets) [20192-150449-02](#) (hereinafter "February 20, 2019 Order").

² *In the Matter of a Commission Inquiry into Electric Vehicle Charging and Infrastructure; In the Matter of Xcel Energy's 2021 Integrated Distribution System Plan; In the Matter of Minnesota Power's 2021 Integrated Distribution System Plan; In the Matter of Distribution System Planning for Otter Tail Power Company, Order*, December 8, 2022, Docket Nos. E-99/CI-17-879, E-002/M-21-694, E-015/M-21-390, E-017/M-21-612 (eDockets) [202212-191192-01](#).

³ [Minn. Stat. § 216B.1615](#) (2023).

August 23, 2023	The Commission issued its Order Accepting Withdrawal of Clean Transportation Portfolio Subject to Conditions. The Order placed a number of conditions upon Xcel Energy, including that it file a TEP by November 1, 2023 consistent with Minn. Stat. § 216B.1615 and that various components and information be included in its filing. ⁴
October 31, 2025	OTP files its 2025 TEP and IDP. ⁵
November 13, 2025	The Commission issues its Notice of Comment Period in the present docket denoting. ⁶
April 7, 2026	The Department files initial comments in response to OTP's 2025 IDP. ⁷
May 12, 2026	OTP files reply comments for its 2025 IDP ⁸ and TEP. ⁹

Topic(s) open for comment:

2025 Otter Tail Power Integrated Distribution System Plan

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

⁴ *In the Matter of Otter Tail Power Company's 2023 Integrated Distribution Plan, Order Accepting 2023 Integrated Distribution Plan and Transportation Electrification Plan, and Modifying Reporting Requirements*, September 16, 2024, Docket No. E017/M-23-380, (eDockets) [20249-210225-01](#) (hereinafter "2023 IDP Order").

⁵ *In the Matter of Otter Tail Power Company's 2025 Integrated Distribution Plan*, Otter Tail Power Company, Integrated Distribution Plan, October 31, 2025, Docket No. E017/M-25-141, (eDockets) [202511-224606-02](#) (hereinafter "2025 IDP").

⁶ Notice.

⁷ Department, Comments, April 7, 2026, Docket No. E017/M-25-141, (eDockets) [20264-230104-02](#), (hereinafter "Department Initial Comments").

⁸ Otter Tail Power Company, Reply Comments, May 12, 2026, Docket No. E017/M-25-141, (eDockets) [20265-231736-02](#), (hereinafter "OTP Reply Comments").

⁹ Otter Tail Power Company, Reply Comments, May 12, 2026, Docket No. E017/M-25-141, (eDockets) [20265-231735-01](#), (hereinafter "OTP TEP Reply Comments").

2025 TEP

5. Should the Commission approve, modify, or reject Otter Tail Power's TEP?
6. Did Otter Tail Power adequately address the Commission's TEP filing requirements and prior Orders, as outlined in Attachment A to this notice?
7. Are there gaps in Otter Tail Power's transportation electrification programs the Commission should address to ensure equitable customer outcomes?
8. Are there other issues or concerns related to this matter?

III. DEPARTMENT ANALYSIS

Before addressing OTP's reply comments, the Department notes that OTP does not provide responses to the Department's recommendations and only replies to the Department's requests for information. Therefore, the Department maintains all of its recommendations made in initial comments.

A. IDP SCHEDULE

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

The Department recommends the Commission order either A or B:

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

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

A.1. Final Recommendations

The Department makes one new recommendation:

The Department recommends the Commission order either A or B:

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

B. CAPACITY

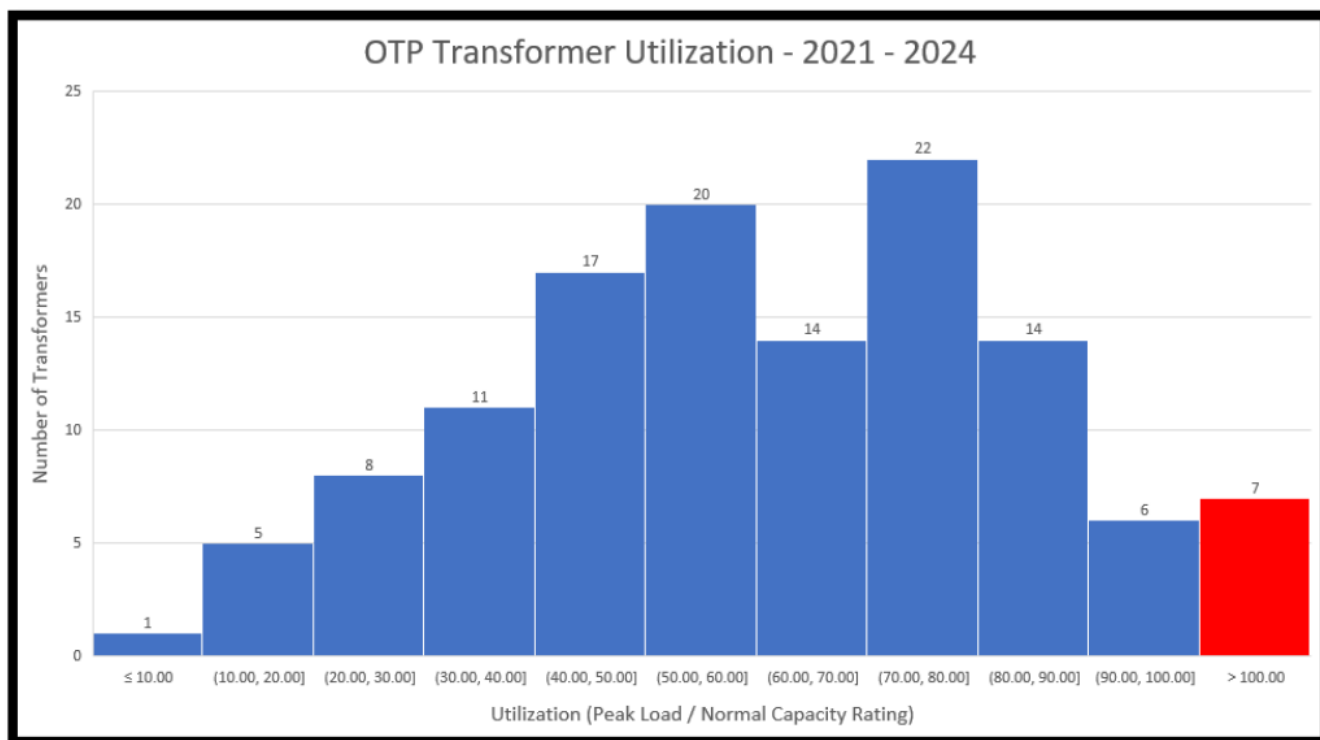
B.1. Substation Transformer Utilization

In its initial comments, the Department requested OTP provide a substation transformer utilization histogram. The Department stated:

The Department requests OTP present in reply comments, a summary histogram that plots the number of substation transformers in bins of substation transformer utilization (peak load /rated capacity) sized at 10% bin widths, from 0% to 100%, with an overflow bin of $\geq 100\%$. OTP should provide a second histogram of substation transformer utilization compared to emergency ratings, if this data is readily accessible. These histograms should exclude substations with either 0 measured load or no data logging capabilities.¹⁰

OTP responds to the Department's request in Figure 1 below.

Figure 1: Histogram of OTP Substation Transformer Utilization With Normal Capacity Ratings



Source: OTP Reply Comments at 2.

¹⁰ Department Initial Comments, at 11.

Based on Figure 1, the median substation transformer utilization is between 60 – 70%, with the actual value likely around 60%.¹¹ There are 7 substation transformers that experienced overloads between 2021 and 2024. OTP explains that it does not directly maintain emergency capacity ratings for its distribution substation transformers, and therefore only data for normal capacity ratings is used in Figure 1.¹² OTP's estimated 60% median substation transformer utilization compares to 37.5% for Minnesota Power (MP),¹³ 58.4% for Xcel,¹⁴ and 74.6% for the Dakota Electric Association (DEA).¹⁵ In addition, 1.6% of OTP's substation transformers experienced overloads compared to normal capacity ratings. This proportion of overloads compares to 6.5% for MP,¹⁶ 5.9% for Xcel,¹⁷ and 28.2% for DEA.¹⁸ OTP's substation capacity utilization is in line with the other investor-owned utilities, but diverges significantly from DEA.

With the full substation capacity dataset now complete with OTP's response, DEA stands out from all other rate-regulated utilities in its tolerance for the exceedance for normal capacity ratings. Over four-times as many of DEA's substation transformers were allowed to exceed their normal capacity ratings as the next highest utility: MP. This discrepancy may offer one explanation for the divergence in utility spending between DEA and all other rate regulated utilities.¹⁹

B.2. Substation Transformer Capacity Mitigations

In its initial comments, the Department requested that OTP explain how the Company plans for substation transformer capacity mitigations. The Department stated:

The Department requests OTP explain in reply comments how the Company views capacity overload risks at its substations and the need for capacity mitigations with historic or existing substation transformer overloads. As applicable, OTP should discuss why the Company has no plans to mitigate substation transformer capacity overloads at any substation transformers that have not been identified for upgrades.²⁰

¹¹ OTP does not provide the actual data, and therefore the Department estimates the median value based on the location of the median value compared to the total number of values within the median bin range.

¹² OTP Reply Comments, at 3.

¹³ *In the Matter of Minnesota Power's 2025 Integrated Distribution Plan*, Department, Comments, March 13, 2026, Docket No. E015/M-25-140, (eDockets) [20263-229266-01](#), at 9 (hereinafter "Department Initial Comments on MP's 2025 IDP").

¹⁴ *In the Matter of Xcel Energy's 2025 Integrated Distribution Plan*, Department, Initial Comments, February 27, 2026, Docket No. E002/M-25-142, (eDockets) [20262-228738-02](#), at 34 (hereinafter "Department Initial Comments on Xcel's 2025 IDP").

¹⁵ *In the Matter of Dakota Electric Association's 2025 Integrated Distribution Plan*, Department, Comments, March 24, 2026, Docket No. E111/M-25-139, (eDockets) [202511-229585-01](#), at 6 (hereinafter "Department Initial Comments on DEA's 2025 IDP").

¹⁶ Department Initial Comments on MP's 2025 IDP, at 9.

¹⁷ Department Initial Comments on Xcel's 2025 IDP, at 34.

¹⁸ Department Initial Comments on DEA's 2025 IDP, at 9.

¹⁹ *In the Matter of Xcel Energy's 2025 Integrated Distribution Plan*, Department, Public Reply Comments, April 23, 2026, Docket No. E002/M-25-142, (eDockets) [20264-230826-02](#), at 37 (hereinafter "Department Reply Comments on Xcel's 2025 IDP").

²⁰ Department Initial Comments, at 11.

OTP provides the following response to the Department's request:

OTP plans distribution substations to operate at or below transformer nameplate capacity ($\leq 100\%$ loading) under normal conditions, using this threshold as its primary benchmark for identifying capacity constraints. Substations nearing this level are evaluated for operational adjustments, load transfers, or capacity upgrades, with particular attention to maintaining sufficient margin in smaller or single-substation systems to accommodate localized variability and seasonal peaks. OTP also recognizes that transformers can safely operate above nameplate for limited durations and therefore evaluates the durations of these overloads to identify the amount of time the equipment spent above the nameplate rating to assess system resilience and inform the timing of mitigation actions.

Rather than relying on a single threshold, OTP applies a risk-based approach to overload conditions, considering factors such as magnitude, frequency, duration, seasonal patterns, and available operational mitigation. This allows OTP to prioritize investments where reliability risk is sustained or material, while using alternatives such as feeder reconfiguration, load transfers, or other operational measures where appropriate. Substations exceeding nameplate capacity are actively monitored, and in cases where overloads are infrequent or short-duration, OTP may defer capital upgrades in favor of cost-effective, data-driven solutions that maintain reliable service.²¹

OTP will pursue all other measures to mitigate capacity risks before making a transformer upgrade. While OTP allows for capacity exceedances on a limited basis, in practice, OTP has allowed for the least amount of overloads compared to all other rate-regulated utilities. This discrepancy in overloads however may be explained by OTP's relatively flat or declining distribution load growth, which would not generally induce overloads.

B.3. Feeder Utilization

In its initial comments, the Department asked OTP to provide a feeder utilization histogram. The Department stated:

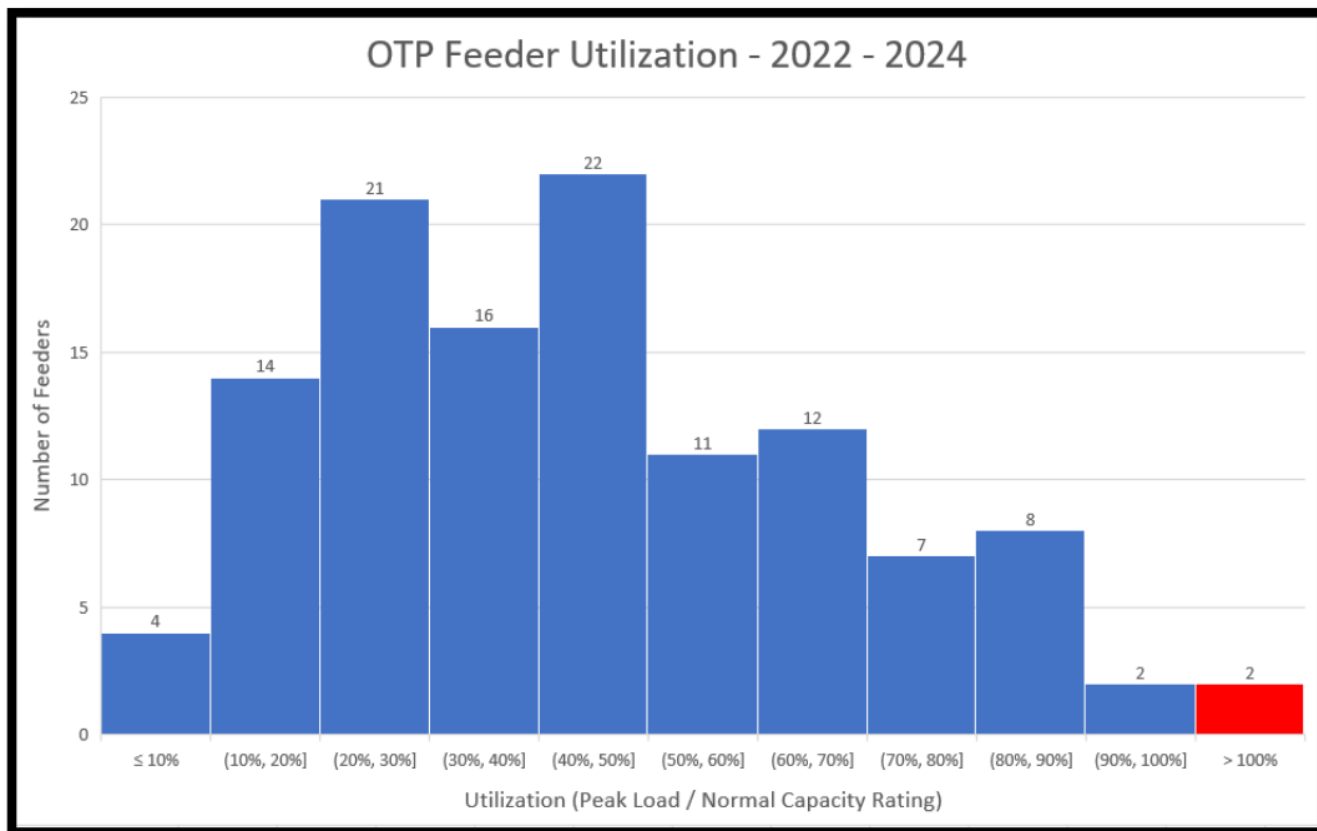
The Department requests OTP present in reply comments, a feeder utilization histogram that is comparable to the Department's requested substation transformer utilization histogram using OTP's Feeder Data Spreadsheet.²²

²¹ OTP Reply Comments, at 3.

²² Department Initial Comments, 12.

OTP responds to the Department's request in Figure 2 below.

Figure 2: Histogram of OTP Feeder Utilization with Normal Capacity Ratings



Source: OTP Reply Comments at 4.

Based on Figure 2, the median feeder utilization is between 40 – 50%, with the actual value likely around 42%.²³ There are 2 feeders that experienced overloads between 2022 and 2024. OTP's estimated 42% median feeder utilization compares to 58.2% for Xcel,²⁴ while MP and DEA do not provide feeder utilization estimates. In addition, 1.7% of OTP's feeders experienced overloads compared to normal capacity ratings. This proportion of overloads compares to 4.3% for Xcel.²⁵

OTP explains that its feeder utilization estimates have measurement issues, and likely represent higher utilization than actual conditions:

OTP notes that the Feeder Utilization Histogram referenced above in Figure 2 is derived from the Company's internal Feeder Data Spreadsheet. This spreadsheet uses the distribution modeling software Synergi Electric to allocate known substation meter demand across individual feeders on a pro-rata basis. The allocation is based solely on downstream connected

²³ OTP does not provide the actual data, and therefore the Department estimates the median value based on the location of the median value compared to the total number of values within the median bin range.

²⁴ Department Reply Comments on Xcel's 2025 IDP, at 37.

²⁵ *Ibid.*

kVA, which reflects the size and phasing of each downstream service transformer.

Historically, this methodology has been the primary means by which OTP has obtained feeder-level insights prior to the full incorporation of Advanced Metering Infrastructure (AMI) data into internal studies and planning methodologies.

While this approach provides a general indication of individual feeder loading and overall system condition, the allocation methodology can at times produce inaccurate or potentially misleading results. Common examples include apparent phase imbalances, where one phase may appear thermally overloaded while the remaining phases are shown to be operating below normal limits. OTP has observed that although this methodology can help identify the potential presence of phase imbalance on the system, the Synergi Electric allocation process may depict these conditions as more severe than they are in actual field conditions.

Accordingly, the feeder utilization histogram data should be interpreted within this context and should not be assumed to represent measurements obtained from physical meters installed directly on individual feeders.²⁶

OTP's data and response are helpful to fill in data gaps with MP and DEA, which likely have access to similar tools and which can additionally provide Advanced Metering Infrastructure (AMI) estimates when the data becomes available. In the 2027 IDPs, the Department will again seek data from these alternative sources from MP and DEA to draw cross utility comparisons. While OTP's substation transformer utilization is equivalent to Xcel's, its feeder utilization is significantly lower than Xcel's. At this time, the Department notes this difference, but does not provide further comments.

B.4. Substation Transformer Sizing Standard

In its initial comments, the Department requested that OTP provide an analysis of the cost effectiveness of a 2.0 MVA substation transformer compared to its existing sizes. The Department stated:

The Department requests OTP present in reply comments a cost effectiveness analysis of a 1.5 MVA and 2.0 MVA substation transformer sizing standard compared to its 2.5 MVA standard.²⁷

OTP provides the following response:

OTP currently stocks 1.0 MVA, 1.5 MVA, and 2.5 MVA units (updated from prior reporting). In response to the Department's request, OTP reviewed the cost effectiveness of adding a 2.0 MVA standard in addition to 2.5 MVA

²⁶ OTP Reply Comments, at 4-5.

²⁷ Department Initial Comments, at 15.

versus utilizing 2.5 MVA transformers for all applications with required capacity between 1.5 MVA and 2.5 MVA. As described below, OTP concludes the incremental cost-effectiveness benefit associated with adding a 2.0 MVA standard would be limited.

[...]

This equates to a 3% increase in cost for a 25% increase in capacity. OTP estimates that, at best, approximately one to two of these annual applications would have load below 2.0 MVA and be suitable for a 2.0 MVA unit.

[...]

In addition, due to long lead times of transformers (2-3 years), OTP would be required to add at least 1, 2.0 MVA unit to standard inventory to maintain appropriate spare coverage and operational flexibility. This would require incremental inventory capital of the same price as the unit itself as well as ongoing carrying, storage, and management costs, which would further reduce the cost effectiveness of adding a new standard size relative to the limited annual purchase-cost savings.

Adding a 2.0 MVA standard would also increase inventory complexity by introducing an additional standard size and associated planning and coordination requirements. Finally, selecting a 2.0 MVA unit in lieu of a 2.5 MVA unit would provide less headroom for future load growth at the served location, potentially increasing the likelihood of an earlier upgrade or replacement if load increases. For these reasons, OTP concludes the cost-effectiveness benefit of standardizing on both 2.0 MVA and 2.5 MVA units would be limited compared to continuing to utilize 2.5 MVA units for requirements in the 1.5–2.5 MVA range, while maintaining the existing 1.0 MVA and 1.5 MVA (with fan-upgrade capability) standards.²⁸

OTP provides excellent justification for its substation transformer standard sizing and provides a thoughtful publicly accessible response that outlines why a 2.0 MVA transformer size should not be used. Coupled with OTP's justification for conductor standard sizing,²⁹ OTP provides evidence of two instances in which oversizing equipment may have a very low marginal cost but significant operational cost saving benefits. This evidence suggests that in areas where utilities experience load growth, it may be significantly less expensive to oversize transformers and conductors to account for uncertain load growth than to conservatively size equipment and risk early replacement. Based on OTP's analysis and explanation, it may be economical to drop the 1.5 MVA transformer size and only use the 1.0 and 2.5 MVA transformer sizes. The example provided above relates to small substation transformers, and similar dynamics may not translate to transformers in the tens of megawatts. At this time, the

²⁸ OTP Reply Comments at 5-6.

²⁹ Department Initial Comments, at 13-15.

Department is still evaluating the rationale for distribution planning decisions, and therefore does not make any recommendations.

B.5. Final Recommendations

The Department does not make any recommendations in this section.

C. RELIABILITY

C.1. Reliability Performance and Outage Drivers

In its initial comments, the Department requested OTP provide a short narrative linking each major reliability-driven program in Appendix B (of the 2025 IDP), by MN IDP Category, to specific outage causes reported in Table 3. The Department stated:

The Department recommends that OTP, in its reply comments, provide a short narrative linking each major reliability-driven program in Appendix B, by MN IDP Category, to specific outage causes, reported in Table 3. The narrative should also quantify, where feasible, the share of each program's Minnesota spend that is directed at each primary cause category.³⁰

In response, OTP provides Table 1 below.

Table 1. OTP Reply Comments- Table D.1 - MN IDP Categories and Interruption Cause Mitigations

MN IDP Category				
Cause	Age related/Asset Renewal	PQ & Reliability Upgrades	Capacity Upgrades	Grid Mod & Pilot Projects
Material or Equipment Failure	x	x	x	x
Squirrel	x	x		
Maintenance	x	x	x	
Weather	x	x		x
Tree on Line	x	x		
Cause unknown	x	x	x	x
Public	x	x		
Animal caused, not squirrel	x	x		
Equipment fault or operation	x	x	x	x
Fire	x	x	x	x
Downstream customer issue	NA	NA	NA	NA
x = Table 3 Outage cause potentially requiring mitigation spend in respective MN IDP Category				

Table 1 maps IDP categories to outage cause categories and states that “[i]t is not feasible to break out share of each program's MN spend that is directed at these causes.”³¹ OTP also provides a

³⁰ Department Initial Comments, at 17.

³¹ OTP Reply Comments, at 6.

supplemental table identifying outage cause distributions for specific localized projects, but notes that “[t]he share of each program’s Minnesota spend directed at annually reducing each primary outage cause category is not quantifiable.”³²

The Department appreciates the Company’s effort in producing Table 1, which provides a useful high-level mapping between investment categories and outage causes. The Department recognizes that attributing program spend to specific outage causes is genuinely complex. At the same time, the Department notes that developing approximate cost shares for programs, for example, like Strategic OH-to-UG (overhead-to-underground) Conversions or Porcelain Cutout Replacement, where the dominant cause drivers are relatively well understood, would strengthen the Department’s ability to assess the overall spending portfolio. The Department looks forward to working with OTP on how this type of analysis might be developed over time, and welcomes further discussion on data and systems would be needed to make it feasible in future IDP cycles.

C.2. Reasons Behind a Reduction in the Reliability and Power Quality Budget

In its initial comments, the Department requested that OTP explain the sharp decline in forecasted reliability and power quality spending. The Department noted that the 2025-2029 forecasted average is 74 percent lower than the historical average from 2020-2024, and stated:

The Department requests that OTP, in reply comments, explain the reasoning behind the significant reduction in the forecasted budget for reliability and power quality upgrades from 2025-2029.³³

OTP responded:

The largest component of the historical spend within the reliability and power quality category is in response to storm recovery. In the past three years (2022, 2023, 2024), OTP has experienced significant storm damage funded from the budgets within this category. Currently, the forecast reflects a lower, more modest and normal storm budget (companywide). This is due to the fact we cannot predict storm damage in any given year. This is then reflected in lower power quality and reliability spend when compared to recent history.³⁴

The Department appreciates the Company’s clarification. The explanation that recent elevated spending was driven by extraordinary storm events rather than baseline program investment is reasonable and provides helpful context. The Department notes that relying on a hard-to-predict storm budget as an explanation for reduced reliability in investment may understate the level of spending needed to address persistent outage drivers.

³² *Id.*, at 7.

³³ Department Initial Comments, at 18.

³⁴ OTP Reply Comments, at 8.

The Department recommends that the Commission order OTP to report, in future filings, that the forecasted budget remains sufficient to address the worst-performing feeders already identified in prior SRSQ filings, independent of storm recovery activity.

C.3. Multiple Categories for OH-to-UG projects

In its initial comments, the Department asked OTP to explain why OH-to-UG conversion projects appear under both the Power Quality (PQ) & Reliability Upgrades and Age-Related/Asset Renewal categories in Appendix B. The Department stated:

The Department requests that OTP, in reply comments, explain the reasoning behind classifying OH-to-UG conversion projects to two MN IDP Categories (PQ & Reliability Upgrades and Age Related/Asset Renewal) in Appendix B.³⁵

OTP responds that “this mapping is a manual process which can be subjective” and that “many projects can span both reliability and asset health categories.” OTP further notes that “IDP categories provide a general sense of where spend is occurring regardless of the assumptions made.”³⁶

The Department appreciates OTP’s explanation and makes no recommendation.

C.4. Summary Table of Strategic OH-to-UG Projects and Selection Criteria

In its initial comments, the Department requested a project-level summary table documenting how each OH-to-UG project met the Company’s stated selection criteria. The Department stated:

The Department requests that OTP, in reply comments, provide a short summary table for all Minnesota strategic OH-to-UG project planned or completed during 2025-2029. This table should specify which criteria (safety, customer impacted, outage history, restoration access, vegetation management access, backlot vs. front-lot routing) were determinative in selecting that project. Additionally, OTP should identify any feeders that met several criteria but were not selected and explain the reasons for their exclusion.³⁷

The Company declines to provide this table, stating that “developing the list of specific drivers for projects completed is not feasible” and that “[a]ccurate data is not readily available and would take substantial labor resources to complete.”³⁸

The Department finds this response inadequate. The Commission’s planning objectives for IDP require utilities to “Provide the Commission with the information necessary to understand utilities’ short-term

³⁵ Department Initial Comments, at 18.

³⁶ OTP Reply Comments, at 8.

³⁷ Department Initial Comments, at 20.

³⁸ OTP Reply Comments, at 9.

and long-term distribution system plans, the costs and benefits of specific investments, and a comprehensive analysis of ratepayer cost and value.”³⁹ A summary table of selection criteria for the Company’s own planned OH-to-UG projects is a basic element of that transparency obligation. The Department understands that OTP’s size and resources differ from larger utilities, but encourages OTP to begin building the data system necessary to support this type of project-level documentation in the next IDP cycle.

C.5. Pre- and Post-Project Feeder Reliability for Fergus Falls and Morris

In its initial comments, the Department requested pre- and post-project feeder-level reliability metrics for at least the Fergus Falls and Morris service areas. The Department stated:

The Department requests that OTP, in reply comments, provide, for at least Fergus Falls and Morris, pre-project and post-project feeder-level SAIDI, SAIFI, and CAIDI values for at least the most recent 12-24 months.⁴⁰

The Company provided the following Table 2.⁴¹

Table 2. Feeder-level SAIDI, SAIFI, and CAIDI for Fergus Falls and Morris Service Areas⁴²

CSC	Substation	Feeder	Year	SAIDI	CAIDI	SAIFI
Fergus Falls	Ottertail City Sub	North Feeder	2024	678.64	251.90	2.69
			2025	84.21	76.19	1.11
Morris	Wheaton S. 115 kV Sub	North Feeder	2024	621.52	215.11	2.89
			2025	139.04	277.63	0.50

The Department appreciates OTP’s response to this request. The post-project reliability improvements at both Fergus Falls and Morris are meaningful, and the data confirm that OH-to-UG investments on those specific feeders have delivered substantial customer benefits. The Department reiterates that this type of project-level outcome reporting should become standard practice across OTP’s reliability portfolio, not limited to the two examples cited.

C.6. Undergrounding vs. Overhead Cost Estimates

In its initial comments, the Department questioned OTP’s cost estimates that showed single-phase underground taps as less expensive than single-phase overhead taps, which is atypical relative to industry norms. The Department stated:

³⁹ *In the Matter of Distribution System Planning for Otter Tail Power Company, Order Adopting Integrated Distribution Plan Filing Requirements*, February 20, 2019, Docket No. E017/CI-18-253, (eDockets) [20192-150449-02](#).

⁴⁰ Department Initial Comments, at 21.

⁴¹ OTP Reply Comments, at 9.

⁴² *Ibid.*

The Department requests that OTP, in reply comments, explain why its normalized generic cost estimates show underground taps as less costly than overhead taps, including: 1) what specific cost components (labor, materials, easements, restoration) are included for each case; 2) whether different design assumptions (e.g., conductor size, trenching conditions, service configuration) apply to the tap cases; and 3) whether these values reflect Minnesota specific or system-wide averages.⁴³

OTP explains that “the UG tap is estimated as less through the WO system as 80% of the project/tap is assumed to be plowed vs bored which equated to lower contractor costs.”⁴⁴ OTP further notes that “[t]he costs provided are OTP system wide estimate and not MN specific” and that the estimates “include all Labor, Overhead, Material, Contractor, and Other costs required for 1 mile construction.”⁴⁵

The Department appreciates OTP’s clarification that the lower underground tap cost reflects a plowing assumption for majority of installations and finds the explanation plausible for OTP’s predominantly rural service territory. The Department makes no recommendation.

C.7. Final Recommendations

The Department makes one new recommendation:

- The Department recommends that the Commission order OTP to report, in future filings, that the forecasted budget remains sufficient to address the worst-performing feeders already identified in prior SRSQ filings, independent of storm recovery activity.

The Department maintains the following recommendations:

- The Department recommends the Commission require OTP, in its next IDP, to develop clear reporting metrics for its reliability projects (e.g., miles converted, segments addressed) and provide a clear methodology for selecting segments in its distribution system for reliability and power quality upgrades.
- The Department recommends the Commission require OTP, in its next IDP, to quantify the value of major reliability and resiliency investments, such as strategic undergrounding, using a recognized customer interruption cost approach (e.g, an Interruption Cost

⁴³ Department Initial Comments, at 21.

⁴⁴ OTP Reply Comments, at 10.

⁴⁵ *Ibid.*

Estimate [ICE] calculator methodology) and to apply that value consistently in cost-benefit comparisons across alternatives.

- The Department recommends that targeted undergrounding be evaluated alongside other reliability mitigation methods that can materially reduce outage minutes on targeted feeders.

D. AGE RELATED REPLACEMENTS AND ASSET RENEWAL

D.1. Age of Undergrounding Projects

In its initial comments, the Department requested that OTP explain how old its age-related undergrounding projects are. The Department stated:

The Department requests that OTP present, in reply comments, an explanation of how old its four undergrounding projects are, and describe any reasons why each planned project is scheduled to be replaced before or after the 50 year depreciation period. The discussion should include OTP's criteria used to prioritize Underground Asset Replacement projects.⁴⁶

OTP provides the following response:

Please note that the observed average service life of all assets in a utility account represents a wide range of assets and therefore individual assets within that account will have widely varied actual service lives. It is expected that the average asset age at a particular facility will not always align with the account's average service life. The applicable account's average service life or depreciable life is an average of the observed and expected service lives of all assets within the broad group.

Early underground cable from the 1970s and 1980s has a much shorter life expectancy than currently manufactured cable today. This is due to improvements in the insulation and jacketing that surround modern day cable.

[...]

These underground primary replacement budgets each represent over 100 work orders, or individual projects, on any given year. Identifying the vintage of these projects would require individual field validation by project or work order. As is customary for all utilities, Otter Tail utilizes mass asset accounting by jurisdiction and does not specify each asset location for installed distribution underground applications and therefore

⁴⁶ Department Initial Comments, at 26.

specific vintage tracking by distribution underground facility is not readily available without significant further evaluation.⁴⁷

OTP's response reflects a common theme amongst all rate-regulated utilities, which was discussed in the Distribution Data Reporting Workgroup. Outside of substation components, utilities do not track the age of system assets and therefore cannot provide data on how old its distribution system is. The Department's request attempted to circumvent a system-wide request and instead focus on a small subset of projects, but as OTP's response explains, even this task is too difficult. If OTP had provided the requested data, the Department would have compared the cable age to OTP's 50-year depreciation window to determine how actual replacements compare to the expected age of replacement. The Department notes that "cable vintage" is listed as a project selection criterion, which generated the Department's request, but it appears that "cable vintage" does not refer to a specific year.

This data gap poses a significant challenge to understand the drivers of age-related spending, and is not endemic to OTP.

D.2. Age of Substation Projects

In its initial comments, the Department requested OTP explain how old its substation projects are. The Department stated:

The Department requests that OTP present, in reply comments, an explanation of how old its nine substation projects are, and describe any reasons why each planned project is scheduled to be replaced before or after the 45 year depreciation period.⁴⁸

OTP provides the following response:

As noted above, observed average service life of all assets in a utility account represents a wide range of assets and therefore individual assets within that account will have widely varied actual service lives. It is expected that the average asset age at a particular facility will not always align with its account's average service life. The applicable account's average service life or depreciable life is an average of the observed and expected service lives of all assets within the broad group. A substation is made up of many different components of varying lifespans. If a component fails or reaches end of life, it will be replaced and the rest of the substation assets will continue to remain in service. Thus, determining an average substation age is not a perfect calculation when considering variations of vintages within a substation. Finally, when a substation is upgraded or replaced, if there are components that can be re-used or

⁴⁷ OTP Reply Comments, at 10-11.

⁴⁸ Department Initial Comments, at 28.

salvaged, they are taken back into inventory. Thus, even if there was an asset that is “newer” it doesn’t mean the assets is thrown away if there is still useful life left in it.

All that to say, the following represents the average age of the substations requested based on accumulated and escalated installed value. Escalations are based off Handy-Whitmen indexes. Also note when planners are looking at substation replacements, gathering of accounting book information is not a practice employed by engineers. Rather they are reviewing installed asset conditions and performance.

- Bemidji BSU Substation – average age ~45 years
- Brandon Substation – average age ~35 years
- Clitherall substation – average age ~45 years
- Elizabeth-Carlisle substation – average age ~46 years
- Erhard substation – average age ~48 years
- Frazee substation – average age ~53 years
- Red Lake Falls substation – average age ~54 years
- Rothsay substation – average age ~51 years
- Vining substation – average age ~42 years⁴⁹

The substantial analysis provided by OTP is helpful to understand OTP’s substation replacement projects. Assuming that each of OTP’s nine substation projects fully replaces existing assets, OTP provides the data the Department requested. However, given that seven out of the nine projects involve rebuilds or consolidations, some substation equipment may be left in place; therefore, the data may not represent the intended data for analysis. Similar to the goal of the previous request, the Department intends to compare only equipment that is replaced within a project to OTP’s expected depreciation lifespan. For example, if only a transformer is replaced, then the Department seeks to compare only the transformer’s age to its expected lifespan and not the weighted average lifespan of all equipment.

With this disclaimer, the data provided by OTP has a median substation age of 46 years, which aligns with OTP’s 45-year depreciation window for substation equipment.⁵⁰ Based on this finding, the Department does not expect OTP’s substation replacement projects to grow or shrink OTP’s rate base, excluding the effects of all other factors such as inflation. OTP’s clarification that replaced equipment

⁴⁹ OTP Reply Comments, at 11-12.

⁵⁰ Department Initial Comments, at 24.

will be reused when possible is helpful, but equipment must be stored at a cost, and if not used over enough time, it may be discarded.

D.3. Need for Substation Consolidation Projects

In its initial comments, the Department requested that OTP explain the rationale behind OTP's consolidated and new substation projects. The Department stated:

The Department requests that OTP present, in reply comments, an explanation of why OTP's two substation Consolidation projects and two New Substation projects are necessary compared to replacing the substations like for like.⁵¹

OTP provides the following response:

The new substations at Carlos and Clearbrook require substation "new builds" because the old substation site equipment must stay in service until the new substation is constructed, commissioned, and existing feeders connected, so load can be served.

The Clitherall-Vining and Elizabeth-Carlisle Substation consolidation project retires two old wood pole substations located within road ROW ditches along with aging equipment and replaces these with one new steel multi-feeder substation. This will increase reliability to each town listed by providing feeder tie backup capabilities at/from the new substation locations. Annual maintenance costs will also be reduced by eliminating a substation.

In addition, the scope of the Brandon substation has now changed from a rebuild project to a transformer upgrade.⁵²

The information provided by OTP adds more detail to line-item budgets and the justification thereof. The Department does not seek further analysis of these projects.

D.4. Risk of Oversized System Assets

In its initial comments, the Department requested that OTP explain how it handles the risk of oversizing assets during asset replacement. The Department stated:

The Department requests that OTP explain, in reply comments, how the Company plans to address the risk of oversized system assets in its planned Age Related Replacements and Asset Renewal projects.⁵³

⁵¹ *Id.*, at 28.

⁵² OTP Reply Comments, at 12.

⁵³ Department Initial Comments, at 29.

OTP provides the following response:

Age-Related Replacement and Asset Renewal projects are primarily driven by asset condition, safety, resilience, and reliability needs rather than by load growth expectations. When replacement is required, OTP evaluates whether the existing asset remains appropriately sized relative to current and forecasted local load and system configuration. Where replacement in-kind meets reliability and safety objectives, OTP generally pursues that option. Deviations from existing sizes are supported by engineering review.⁵⁴

OTP's response does not directly address the Department's concern about oversizing system assets during asset replacement. OTP generically describes how asset replacement decisions are made, but does not address how OTP's flat or shrinking load growth is factored into this process. However, given the discussion in Section III.B, regarding the small marginal cost of oversizing system assets, the Department does not seek further information about asset sizing at this time.

D.5. Final Recommendations

The Department maintains the following recommendations:

The Department recommends that all of OTP's New Undergrounding projects under its Age Related Replacement Budget undergo the same cost effectiveness analysis as undergrounding projects in the System Expansion or Upgrades for Reliability and Power Quality budget category.

The Department recommends that the Commission require OTP to provide a cost benefit analysis of its Cut-Out Replacement Program in OTP's 2027 IDP that weighs the reliability benefits of the program against the deferral benefits of replacing cut-outs at the end of their useful life.

E. WILDFIRE

E.1. Fire Outages

In its initial comments, the Department requested that OTP delineate which of its fire-outages were caused by wildfires. The Department stated:

The Department requests that OTP present in its reply comments a breakdown of all fire outages caused by wildfire compared to all fire outages caused by any other means. OTP should outline which specific outages in IR 5 correspond to actual wildfires.⁵⁵

⁵⁴ OTP Reply Comments, at 13.

⁵⁵ Department Initial Comments, at 41.

OTP provides the following response:

In reviewing the Department's assessment of wildfire risk, it appears as though a correlation between fire caused outages is being associated with wildfire risk. In this regard, OTP has had minimal interruptions to customers due to a fire. In 2023 and 2024, there were 3 fires that created interruptions to OTP customers.

[...]

However, there are more interruptions on the system annually that create a fire. This usually is a fire that is contained to the pole or a very localized area. That said, these are more closely aligned to the risk OTPs WMP is looking to mitigate; reducing the risk of energized utility assets creating an uncontrollable fire.

The remaining fire-noted interruptions in IR5, and summarized in table 10 in the DOC comments, are all related to OTP assets. This would include cross arm fires, pole fires, transformers fires, etc. None of these fires led to uncontrolled wildfire.⁵⁶

The Department is not solely interested in outages that are caused by wildfire, as both outages caused by wildfire and outages that begin with fires from OTP equipment are important to consider in a wildfire management plan (WMP). As the Department discusses in its initial comments, there were 29 fire outages in 2023 and 2024,⁵⁷ and with the subtraction of three outages caused by external fires, 26 of these outages appear to be caused by OTP equipment starting fires. As OTP states, its WMP is most concerned with preventing wildfires rather than being resilient to them, which is supported by the data presented by OTP.

In order to justify the expenses proposed by OTP's WMP, OTP should be able to explain the new risk that OTP's equipment fires pose to create wildfires in Minnesota. On a statewide level between 2021 and 2025, there were an average of 42 fires caused by utility equipment per year, which burned an average of 77.4 acres per year, or 1.85 acres per fire, which is summarized in Figure 3.^{58,59} Over this

⁵⁶ OTP Reply Comments, at 13-14.

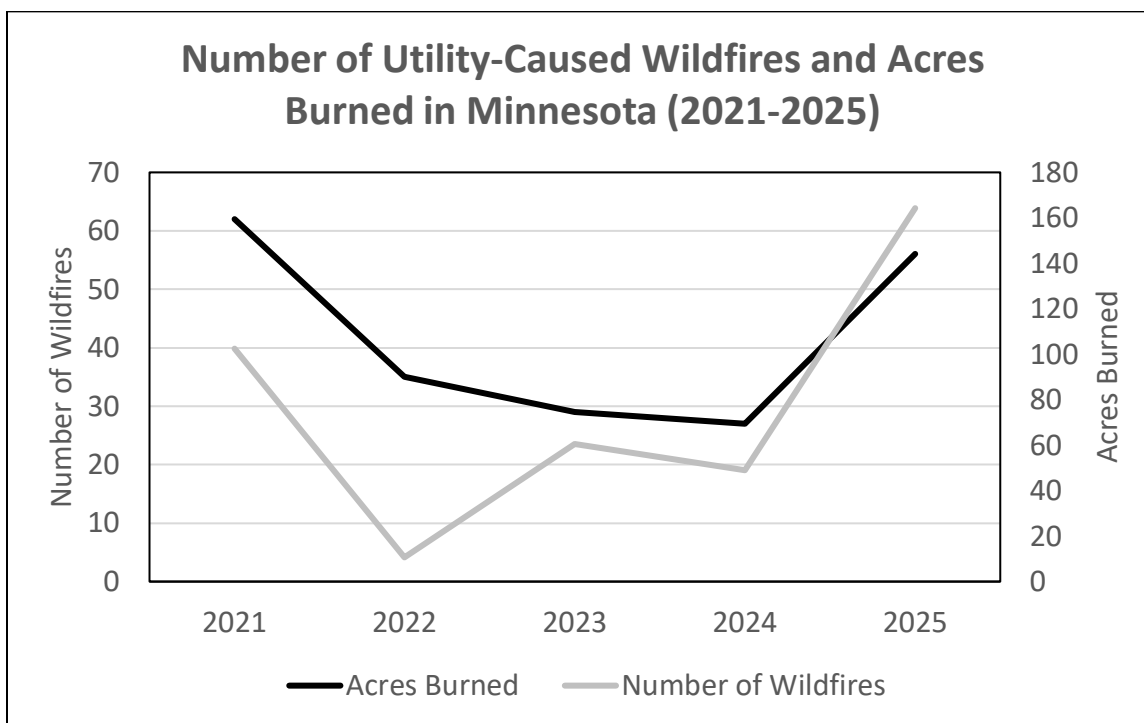
⁵⁷ Department Initial Comments, at 40.

⁵⁸ Data obtained from the InFORM Fire Occurrence Data Records Database. Data reporting changed significantly in 2021 and makes comparisons to previous years impractical. Dataset filter on the field "Fire Cause General" was used with a value of "7," which corresponds to the "Power generation / transmission / distribution" outage cause. Dataset also filtered to exclude fires without a calculated acreage because calculated acreage can be as low as 0.01 acres, which would indicate very limited spreading. InFORM Fire Occurrence Data Records. National Interagency Fire Center, (May 20, 2026). (hereinafter "InFORM Fire Occurrence Database"). Available at: <https://data-nifc.opendata.arcgis.com/datasets/nifc::inform-fire-occurrence-data-records/explore?location=45.577675%2C-93.380653%2C8&showTable=true>

⁵⁹ Methodology adapted from: Eagleston, H., Bester, M., Yusuf, J., Damodaran, A., & Reno, M. J. (2025). Systemic Drivers of Electric-Grid-Caused Catastrophic Wildfires: Implications for Resilience in the United States. *Challenges*, 16(1), 13. Available at: <https://www.mdpi.com/2078-1547/16/1/13>

same time period, there was an average of 1,096 fires per year by any cause in Minnesota, which burned an average of 34,924 acres per year, or 31.9 acres per fire. Utility-caused wildfires between 2021 and 2025 account for 3.8 percent of all fires in Minnesota and account for 0.04 percent of all acres burned, which means that utility fires are infrequent and burn significantly less acreage when they ignite compared to the average Minnesota fire.⁶⁰ Assuming OTP maintains its distribution system in a similar manner to how it did between 2021 and 2025, OTP should be able to explain why the status quo that has resulted in a relatively low instance of utility caused fires for years is no longer acceptable. If resilience to fire is not a main goal of the WMP, then OTP should seriously consider prioritizing enhanced tree trimming and enhanced inspection programs, for example with drones, to ensure that it only replaces equipment that poses significant fire risks, rather than pursue blanket projects in high risk areas regardless of actual risk potential from the utility equipment. This strategy may be significantly less expensive than proactively undergrounding every steel and copper distribution line and every cut out and expulsion fuse in a high risk area.⁶¹ The Department expects that OTP will carefully weigh the costs and benefits of its WMP expenditures against feasible alternatives, including the status quo or end-of-life replacements only.

Figure 3: Summary of Utility Caused Wildfires in Minnesota



Source: InFORM Fire Occurrence Database

At a statewide level, it is important to consider whether the hundreds of millions of dollars of proposed wildfire mitigation measures across the IOUs are worth the prevention of fires that have, in recent history, accounted for 0.04 percent of all acres burned by fire in Minnesota. Even though the utility-

⁶⁰ *Ibid.*

⁶¹ 2025 IDP, at 47.

caused Stewart Trail Fire that burned 355 acres is the largest reported utility-caused fire to date,⁶² this fire only accounts for 1.0 percent of the annual average acreage burned in Minnesota in 2021-2025. As a state, Minnesota typically spends around \$29 million annually to prevent and fight wildfires of any cause.⁶³ Based on the proportion of utility-caused wildfires to all wildfires, the corresponding statewide annual fire expenditures are equivalent to \$1.1 million.⁶⁴ The internalization of wildfire prevention expenses into utility budgets should be carefully weighed against the alternative option to increase statewide wildfire prevention activities that may be much farther-reaching and more cost-effective. While it is not within the Commission's regulatory authority to affect wildfire prevention activities outside of utilities, it is important to consider the greater context in which these utility expenses are proposed.

The Department is not opposed to increased utility expenditures to prevent and adapt to wildfires, but the Department is concerned about the effect of these expenditures on Minnesota ratepayers.

E.2. Contractual Services for WMP Review

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

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

E.3. Final Recommendations

The Department maintains the following recommendations:

The Department recommends that the Commission require Otter Tail to file its future (outside of the current rate case test year) Minnesota-specific Wildfire Mitigation Plan with the Commission as an attachment or

⁶² LaPlante, Warren. *Stewart Trail Fire Update*. Lake County, Minnesota Government, (May 18, 2026). Available at: <https://www.co.lake.mn.us/stewart-trail-fire/>

⁶³ Warnke, Michael. *Annual Report on Emergency Firefighting Expenditures - Fiscal Year 2025*. Minnesota Department of Natural Resources – Division of Forestry, (January 15, 2026). At 5. Available at: <https://files.dnr.state.mn.us/aboutdnr/reports/legislative/2025/fy2025-emergency-firefighting-fund-rpt-dnr.pdf>

⁶⁴ If acres burned are used instead for normalization, the corresponding budget would be equivalent to \$64,000 per year.

supplement to its IDP. The Department recommends the Commission require OTP to include at least the following in its Wildfire Mitigation Plan:

- A description of the intent of the Company in mitigating wildfire risk (i.e. mitigating utility-caused wildfires/minimizing liability or mitigating fire damage to utility assets).
- A definition of “wildfire” as it is used for utility identification, planning and mitigation.
- A discussion of its risk modelling, mapping and project prioritization process within its Wildfire Mitigation Plan.
- Quantification of actual wildfire risk in OTP’s territory based on the probability and size of a fire, and land use.
- Wildfire risk should be compared to other reliability and safety risks as well as the wildfire risk experienced in OTP’s other jurisdictions.
- Quantification of wildfire damages by event size, including OTP-owned and other property damage, applicable liability, and any other costs OTP deems reasonable to include.
- The most recent version of its wildfire risk map with a narrative explanation of the highest risk areas, and any changes from the last iteration of the Wildfire Mitigation Plan.
- Reporting on the number and location of wildfires experienced in its territory, the number of outages caused by wildfire, and the average length of wildfire-related outage over the last ten years.
- Reporting on the efficacy of its wildfire mitigation strategy in reducing wildfire-related outages (i.e. After deployment of the approved wildfire mitigation measures, showing that wildfire-related outages in OTP’s territory decreased by 50 percent; the average length of wildfire-related outage decreased by 20 percent.).
- A full cost benefit analysis of any wildfire mitigation proposals.

The Department makes the following new recommendation:

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

F. NON-WIRES ALTERNATIVES ANALYSIS

In its initial comments, the Department requested additional information on OTP’s NWA projects. The Department stated:

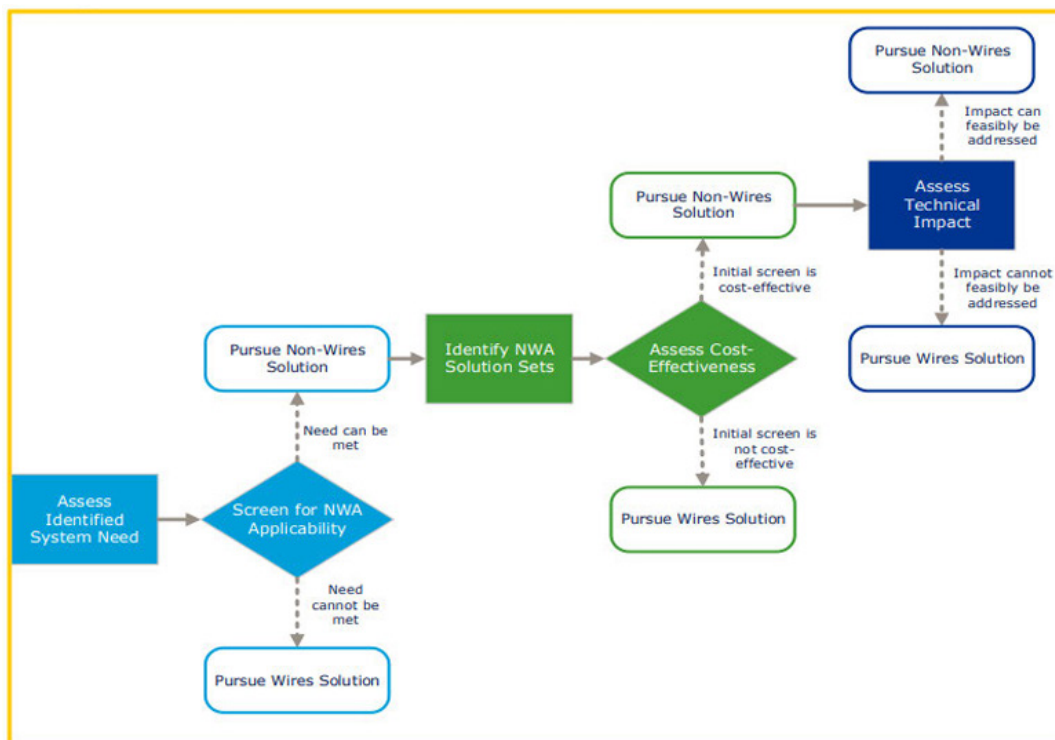
The Department requests that OTP, in reply comments, clarify and describe the types of projects it considers for its NWA analysis.⁶⁵

In response, OTP states that, in addition to capacity projects, the Company considers interconnection, sectionalizing and contingency type projects as candidates that may require an NWA analysis.⁶⁶

In its initial comments, the Department also requested that OTP clarify its NWA analysis process per Commission Order Point 3 of the Commission's 2023 IDP Order.⁶⁷ The Department stated:

The Department requests that OTP, in reply comments, describe the Company's process for its NWA analysis.⁶⁸

In response, OTP provided the following high level NWA Initial Screening Process Flowchart that the Company plans to use for future NWA project analysis.⁶⁹



The Department finds OTP to be compliant with NWA-specific filing requirements.

F.1. Final Recommendations

⁶⁵ Department Initial Comments, at 43.

⁶⁶ OTP Reply Comments, at 14.

⁶⁷ See Order Point 3. *In the Matter of Otter Tail Power Company's 2023 Integrated Distribution Plan, Order Accepting 2023 Integrated Distribution Plan and Transportation Electrification Plan, and Modifying Reporting Requirements*, September 16, 2024, Docket No. E017/M-23-380, (eDockets) [20249-210225-01](#).

⁶⁸ Department Initial Comments, at 44.

⁶⁹ OTP Reply Comments, at 14-15.

The Department does not make any recommendations in this section.

G. TRANSPORTATION ELECTRIFICATION PLAN (TEP)

G.1. Historic and Future Spending

In its initial comments, the Department requested additional detail on OTP's budget tables related to historic and future transportation electrification spending. The Department was interested in further understanding OTP's allotments for Level 2 charger incentives, as home charging could help to reduce barriers to EV ownership in OTP's rural territory. The Department requested:

OTP, in reply comments, update tables 1 and 2 of its TEP to indicate the number of and expenditures related to level 2 charger rebates provided by the Company in the last five years and the planned rebates for the next five years [internal citation removed].⁷⁰

In its TEP reply comments, OTP includes Table 1 and Table 2 from its original filing, modified to include expenditures related to level 2 charger rebates for the periods requested by the Department.⁷¹ Table 1 summarizes total rebate costs of \$19,200 for forty-five Level 2 chargers enrolled in off-peak rates. Table 2 shows total projected customer rebate costs of \$50,000, for an average of twenty Level 2 chargers added annually over five years (100 chargers total), all participating on off-peak rates.⁷² OTP states that it expects an average of ten Level 2 chargers enrolled annually in its already existing off-peak rates and ten Level 2 chargers to enroll annually in the new EVantage off-peak EV charging rate.⁷³

The Department appreciates OTP's response. The Department looks forward to tracking how OTP's level 2 charging rebates and the new EVantage rate increase EV adoption in its territory. Compared to the only 326 EVs in OTP's territory (based on February 2026 data) an additional 100 level two chargers could significantly increase access to home charging in OTP's territory.⁷⁴ The Department has no additional recommendations at this time.

G.2. Minn. Stat. § 216B.1615, subd. 3(5)

In its initial comments, the Department requested that, "OTP discuss, in reply comments, how its Transportation Electrification portfolio addresses the requirement of Minn. Stat. § 216B.1615 subd. 3(5)."⁷⁵

In response, OTP states that all of its TEP initiatives aim to reduce the reliance on fossil fuels,

⁷⁰ Department Initial Comments, at 47.

⁷¹ OTP TEP Reply Comments, at pdf 3.

⁷² *Id.*, at pdf 2.

⁷³ *Ibid.*

⁷⁴ *Id.*, at pdf 4.

⁷⁵ Department Initial Comments, at 50.

thereby reducing greenhouse gas emissions in accordance with Minn. Stat. § 216B.1615 subd. 3(5).⁷⁶ OTP states that its rate offerings, including its public Direct Current Fast Charger (DCFC) EV charging rates and its private level 2 off-peak EV charging rates, promote off-peak or low-cost charging. OTP states that the goal of its low-cost charging hours is to align charging with when renewable resources are producing energy at high levels in the Midcontinent Independent System Operator (MISO). OTP asserts that, because of the strong energy output by renewable resources during off-peak hours, MISO localized marginal prices are driven lower, allowing affordable EV charging, displacing emission-producing electric generation. Additionally, the Company states that it offers EV rebates, through its 2024-2026 Energy Conservation and Optimization (ECO) portfolio, to customers that purchase an EV.⁷⁷

The Department appreciates the additional detail provided by OTP in its replies. The Department concludes that OTP has satisfied Minn. Stat. § 216B.1615 subd. 3(5).⁷⁸

G.3. Range of Future Spending

In its initial comments, the Department assessed OTP's compliance with Minn. Stat. § 216B.1615, subd. 3(9) regarding the requirement that the "Commission consider whether the TEP proposals are reasonably expected to 'reasonably balance the benefits of ratepayer funded investments in transportation electrification and impacts on utility rates.'" ⁷⁹

The Department remains relatively unconvinced that the Company's TEP portfolio is causing an imbalance of ratepayer investments and utility rates, given the relatively early phase of transportation electrification in OTP's territory. Nevertheless, the Department requested that OTP clarify what was included within its range of anticipated future spending on transportation electrification: "The Department requests that OTP, in reply comments, explain the range of anticipated future transportation electrification spending depicted in its Table 2."⁸⁰

Otter Tail states that the spending estimates in Table 2 reflect several scenarios based on early estimates and projections of the fate of its DCFC network. At the low end of the range, the Company states it could incur minimal maintenance costs if the Company is ordered to conclude the pilot program and divest the related infrastructure or pay for removal if equipment is end of life. A medium range scenario includes the possibility of keeping the existing DCFC infrastructure, maintaining it, and staying with the same or similar cost network provider. The medium range scenario presented by the Company relies heavily on both existing equipment not having major failures, and also the existing service providers remaining in the EV maintenance and networking marketplace. The medium range scenario is ideal for cost management, but in 2025 OTP states it experienced two of its vendors withdrawing from providing these services, thereby creating temporary gaps in its DCFC network.⁸¹

⁷⁶ OTP TEP Reply Comments, at pdf 4.

⁷⁷ *Id.*, at pdf 3.

⁷⁸ [Minn. Stat. § 216B.1615, subd. 3\(5\)](#).

⁷⁹ [Minn. Stat. § 216B.1615, subd. 3\(9\)](#).

⁸⁰ Department Initial Comments, at 52.

⁸¹ OTP TEP Reply Comments, at pdf 5.

At the high end, OTP could pursue reinvestment by proposing upgrades to aging equipment. Under the high range scenario, options under evaluation include new equipment, enhanced networking, and revised maintenance models that would replace current rates with a cost structure more closely tied to energy sales. Tying maintenance and networking costs to energy sales allows expenses to scale more efficiently, strengthens long-term cost control, and may reduce the need for ongoing subsidies beyond the initial capital investment. At this time, OTP states that it is monitoring conditions and is not proposing any changes beyond operating its current DCFC network.⁸²

OTP states that the wide range for potential ECO Rebate and Marketing expenditures largely depends on rebate levels and the sensitivity of participation rates. OTP discusses that small shifts in customer uptake could generate significant budget volatility related to ECO Rebate and Marketing expenses. OTP discusses states that its current draft estimates suggest ECO rebates could range from \$2,000–\$5,000 per electric vehicle and approximately \$25,000 per electric school bus. OTP discusses that the range of ECO Rebate and Marketing expenditures, specifically relating to rebate amounts, is also especially challenging to forecast because federal and state tax incentive programs have been drivers of customer participation and can be offered or terminated depending on election outcomes.⁸³

The Department appreciates the additional detail provided by the Company in its replies. The Department looks forward to continuing to track actual transportation electrification spending, in future TEP filings. The Department concludes that OTP has satisfied the requirements of Minn. Stat. § 216B.1615, subd. 3(9).

G.4. DCFC Pilot

In its initial comments, related to OTP's DCFC Pilot, the Department requested that:

OTP, in reply comments, provide a five-year cost-benefit projection of its DCFC fleet, detailing rural-specific fixed and variable maintenance costs alongside targeted utilization strategies to improve revenue ratios. This analysis must include a clear roadmap toward financial self-sufficiency to protect non-EV-driving ratepayers from long-term O&M subsidies.⁸⁴

In response OTP states:

The Company recognizes the importance of providing a cost-benefit analysis and is committed to reporting all costs and benefits in compliance with the Commission's guidance when more information on performance of our DCFC network is available. The Company has only recently completed the installation of its final DCFC site in Bemidji, MN. The Company will be better positioned to conduct a comprehensive cost-benefit analysis once we can gather two years of usage data across all locations. The Company plans to include this analysis and associated data

⁸² *Ibid.*

⁸³ *Ibid.*

⁸⁴ Department Initial Comments, at 54.

in the Company's next TEP, as well as the Company's annual June 1 pilot filing updates [internal citation removed].⁸⁵

The Company also notes that it believes that its DCFC investments should not be assessed in isolation, but as a part of its larger, comprehensive transportation electrification strategy.⁸⁶ The Company states:

This integrated perspective does not diminish the Company's awareness of long-term operations and maintenance costs associated with DCFC infrastructure. Rather, the Company emphasizes that the DCFC infrastructure represents a limited pilot intended to support data gathering, inform rate development, and accelerate electric vehicle adoption. As vehicle adoption increases, DCFC utilization is expected to rise, improving the long-term economics of these assets. The Company anticipates that the point at which DCFC investments approach breakeven on a standalone basis will align with increased participation by third-party investors.⁸⁷

The Department appreciates OTP's commitment to continue the analysis of its DCFC pilot's cost effectiveness in the next TEP. The Department remains concerned that the DCFC Pilot may not be a transitional market-making tool, but rather a longer-term regulated asset class in areas that remain unattractive to private developers.⁸⁸ If the latter, the Department is concerned with the balance of ratepayer funded investments and those that could be made by private investment. The Department makes no additional recommendation at this time and looks forward to additional analysis and discussion in the Company's next TEP.

G.5. EVantage

In its initial comments, related to the OTP's EVantage program, the Department requested:

The Department requests that OTP, in reply comments, provide the expected customer count, expected load shift, expected avoided system costs associated with the proposed EV Load Management Rate.⁸⁹

The Company responded with its Table 4,⁹⁰ stating:

As shown in Table 4, the Company is forecasting the addition of 10 customers to the new EV Load Management Rate (EVantage) annually. By 2030, the Company is anticipating 50 participants on this new rate, resulting in a shift of 355.9 kW and \$49,843 of cumulative benefits

⁸⁵ OTP TEP Reply Comments, at pdf 6.

⁸⁶ *Ibid.*

⁸⁷ *Id.*, at 6-7.

⁸⁸ Department Initial Comments, at 53.

⁸⁹ Department Initial Comments, at 55.

⁹⁰ OTP TEP Reply Comments, at pdf 7.

stemming from avoided system costs in 2030. Looking further ahead, customer participation is expected to continue to grow beyond this point as electric vehicle registrations in the Company's service territory grow year over year.⁹¹

The Department appreciates OTPs response. The Department notes that the Commission's Order approving the Company's EVantage proposal and the requirements of Order Point 6 requiring reporting on enrollments, control events, event opt-out capabilities and any issues the Company or its customers experience during control events.⁹² The Order specifies the reporting will start with the Company's June 2027 EV Annual Report.⁹³ The Department looks forward to future reporting on the EVantage program.

G.6. OTP Clarification Adoption Forecast

In its initial comments, the Department stated:

The Department cautions that applying a statewide growth metric to the Company's predominantly rural service territory likely overstates near-term adoption. Historical uptake rates and recent academic literature suggest that rural adoption curves lag significantly behind state averages due to unique geographical and infrastructure barriers. For instance, recent studies in similar rural jurisdictions indicate that consumer intent to purchase battery electric vehicles (BEVs) remains as low as 5 percent with total registrations hovering near 0.3 percent of the total vehicle fleet. Consequently, the Department views a 37 percent growth rate as highly aggressive given the specific demographic and geographic characteristics of the Company's service territory [internal citations omitted].⁹⁴

Otter Tail responds to the Department's caution, and states that the electric vehicle registration data and growth metric of 37 percent used to create Figure A from the Company's initial filing was based on registration data specific to Otter Tail, as provided by the Minnesota Public Utility Commission from Minnesota Department of Transportation data. The data below, in Table 5, highlights the electric vehicles served by Otter Tail Power and the Year-Over-Year growth:⁹⁵

⁹¹ *Ibid.*

⁹² *In the Matter of Otter Tail Power Company's 2023 Integrated Distribution Plan, Order*, February 3, 2026, Docket No. E-017/M-23-380, (eDockets) [20262-227791-01](#), at Order Point 6.

⁹³ *Ibid.*

⁹⁴ Department Initial Comments, at 55.

⁹⁵ OTP TEP Reply Comments, at 7.

Figure 4: OTP Table 5

Registration Year	Electric Vehicles Served by Otter Tail Power	YOY Growth
2024	270	
2023	194	39.2%
2022	145	33.8%
2021	104	39.4%
	Average	37.5%

Source: OTP TEP Reply Comments, at pdf 8.

G.7. Approve, Reject, Modify

The Department responds to the following notice topic:

Should the Commission approve, modify, or reject Otter Tail Power's TEP?

The Department recommends the Commission approve Otter Tail Power's 2025 TEP.

G.8. Final Recommendations

The Department makes one new recommendation:

The Department recommends the Commission approve Otter Tail Power's 2025 TEP.

IV. DEPARTMENT RECOMMENDATIONS

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

A. IDP SCHEDULE

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

C. RELIABILITY

- The Department recommends that the Commission order OTP to report, in future filings, that the forecasted budget remains sufficient to address the worst-performing feeders already identified in prior SRSQ filings, independent of storm recovery activity.

- The Department recommends the Commission require OTP, in its next IDP, to develop clear reporting metrics for its reliability projects (e.g., miles converted, segments addressed) and provide a clear methodology for selecting segments in its distribution system for reliability and power quality upgrades.
- The Department recommends the Commission require OTP, in its next IDP, to quantify the value of major reliability and resiliency investments, such as strategic undergrounding, using a recognized customer interruption cost approach (e.g, an Interruption Cost Estimate [ICE] calculator methodology) and to apply that value consistently in cost-benefit comparisons across alternatives.
- The Department recommends that targeted undergrounding be evaluated alongside other reliability mitigation methods that can materially reduce outage minutes on targeted feeders.

D. AGE RELATED REPLACEMENTS AND ASSET RENEWAL

- The Department recommends that all of OTP's New Undergrounding projects under its Age Related Replacement Budget undergo the same cost effectiveness analysis as undergrounding projects in the System Expansion or Upgrades for Reliability and Power Quality budget category.
- The Department recommends that the Commission require OTP to provide a cost benefit analysis of its Cut-Out Replacement Program in OTP's 2027 IDP that weighs the reliability benefits of the program against the deferral benefits of replacing cut-outs at the end of their useful life.

E. WILDFIRE

- The Department recommends that the Commission require Otter Tail to file its future (outside of the current rate case test year) Minnesota-specific Wildfire Mitigation Plan with the Commission as an attachment or supplement to its IDP. The Department recommends the Commission require OTP to include at least the following in its Wildfire Mitigation Plan:
 - A description of the intent of the Company in mitigating wildfire risk (i.e. mitigating utility-caused wildfires/minimizing liability or mitigating fire damage to utility assets).
 - A definition of "wildfire" as it is used for utility identification, planning and mitigation.
 - A discussion of its risk modelling, mapping and project prioritization process within its Wildfire Mitigation Plan.
 - Quantification of actual wildfire risk in OTP's territory based on the probability and size of a fire, and land use.
 - Wildfire risk should be compared to other reliability and safety risks as well as the wildfire risk experienced in OTP's other jurisdictions.
 - Quantification of wildfire damages by event size, including OTP-owned and other property damage, applicable liability, and any other costs OTP deems reasonable to include.

- The most recent version of its wildfire risk map with a narrative explanation of the highest risk areas, and any changes from the last iteration of the Wildfire Mitigation Plan.
 - Reporting on the number and location of wildfires experienced in its territory, the number of outages caused by wildfire, and the average length of wildfire-related outage over the last ten years.
 - Reporting on the efficacy of its wildfire mitigation strategy in reducing wildfire-related outages (i.e. After deployment of the approved wildfire mitigation measures, showing that wildfire-related outages in OTP's territory decreased by 50 percent; the average length of wildfire-related outage decreased by 20 percent.).
 - A full cost benefit analysis of any wildfire mitigation proposals.
- The Department recommends the Commission authorize the Department to spend up to \$300,000 total to obtain contractual services for the review of all four rate-regulated utilities' wildfire mitigation plans.

G. TRANSPORTATION ELECTRIFICATION PLAN (TEP)

- The Department recommends the Commission approve Otter Tail Power's 2025 TEP.

CERTIFICATE OF SERVICE

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

Minnesota Department of Commerce
Reply Comments

Docket No. E017/M-25-141

Dated this **4th** day of **June 2026**

/s/Sharon Ferguson

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110	Ronald	Horman	rhorman@redwoodelectric.com	Redwood Electric Cooperative		60 Pine Street Clements MN, 56224 United States	Electronic Service		No	M-25-141
111	Frank	Hornstein	frank.hornstein@minneapolismn.gov	City of Minneapolis		350 South 5th Street Minneapolis MN, 55415 United States	Electronic Service		No	M-25-141
112	Samantha	Houston	shouston@ucs.org	Union of Concerned Scientists		1825 K St. NW Ste 800 Washington DC, 20006 United States	Electronic Service		No	M-25-141
113	Lori	Hoyum	lhoyum@mnpower.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	M-25-141

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
114	Jan	Hubbard	jan.hubbard@comcast.net			7730 Mississippi Lane Brooklyn Park MN, 55444 United States	Electronic Service		No	M-25-141
115	Dean	Hunter	dean.hunter@state.mn.us		Minnesota Department of Labor & Industry	443 Lafayette Rd N St. Paul MN, 55155-4341 United States	Electronic Service		No	M-25-141
116	Reuben	Hunter	bhunter@madisonei.com	Madison Energy Investments		8100 Boone Blvd Suite 430 Vienna VA, 22182 United States	Electronic Service		No	M-25-141
117	Casey	Jacobson	cjacobson@bepc.com	Basin Electric Power Cooperative		1717 East Interstate Avenue Bismarck ND, 58501 United States	Electronic Service		No	M-25-141
118	John S.	Jaffray	jjaffray@jjrpower.com	JJR Power		350 Highway 7 Suite 236 Excelsior MN, 55331 United States	Electronic Service		No	M-25-141
119	Robert	Jagusch	rjagusch@mmua.org	MMUA		3025 Harbor Lane N Minneapolis MN, 55447 United States	Electronic Service		No	M-25-141
120	Chris	Jarosch	chris@carrcreekelectricservice.com	Carr Creek Electric Service, LLC		209 Sommers Street North Hudson WI, 54016 United States	Electronic Service		No	M-25-141
121	Alan	Jenkins	aj@jenkinsatlaw.com	Jenkins at Law		2950 Yellowtail Ave. Marathon FL, 33050 United States	Electronic Service		No	M-25-141
122	Richard	Johnson	rickjohnson@cozen.com	Cozen O'Connor		150 S. 5th Street Suite 1200 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-141
123	Sarah	Johnson Phillips	sjphillips@stoel.com	Stoel Rives LLP		33 South Sixth Street Suite 4200 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-141
124	Nate	Jones	njones@hcpd.com	Heartland Consumers Power		PO Box 248 Madison SD, 57042 United States	Electronic Service		No	M-25-141
125	Philip	Jones	phil@evtransportationalliance.org			1402 Third Ave Ste 1315 Seattle WA, 98101 United States	Electronic Service		No	M-25-141
126	Julie	Jorgensen	julie@greenmark.us.com	Greenmark Solar		4630 Quebec Ave N New Hope MN, 55428-4973 United States	Electronic Service		No	M-25-141
127	Kevin	Joyce	kjoyce@tesla.com			null null, null United States	Electronic Service		No	M-25-141
128	Mahmoud	Kabalan	mahmoud.kabalan@stthomas.edu	University of St Thomas		2115 Summit Ave. Mail OSS100 School of Engineering	Electronic Service		No	M-25-141

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

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						MN, 55401 United States				
143	Brian	Krambeer	bkrambeer@mienergy.coop	MiEnergy Cooperative		PO Box 626 31110 Cooperative Way Rushford MN, 55971 United States	Electronic Service		No	M-25-141
144	Michael	Krause	michaelkrause61@yahoo.com			1200 Plymouth Avenue Minneapolis MN, 55411 United States	Electronic Service		No	M-25-141
145	Michael	Krikava	mkrikava@taftlaw.com	Taft Stettinius & Hollister LLP		2200 IDS Center 80 S 8th St Minneapolis MN, 55402 United States	Electronic Service		No	M-25-141
146	Corrina	Kumpe	ckumpe@mysunshare.com			null null, null United States	Electronic Service		No	M-25-141
147	Matthew	Lacey	mlacey@grenergy.com	Great River Energy		12300 Elm Creek Boulevard Maple Grove MN, 55369-4718 United States	Electronic Service		No	M-25-141
148	James D.	Larson	james.larson@avantenergy.com	Avant Energy Services		220 S 6th St Ste 1300 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-141
149	Mark	Larson	mlarson@meeker.coop	Meeker Coop Light & Power Assn		1725 Highway 12 E Ste 100 Litchfield MN, 55355 United States	Electronic Service		No	M-25-141
150	Burnell	Lauer	blauer.sundial@gmail.com	Sundial Solar		3209 W. 76th St #305 Edina MN, 55435 United States	Electronic Service		No	M-25-141
151	Dean	Leischow	dean@sunrisenrg.com	Sunrise Energy Ventures		315 Manitoba Ave Ste 200 Wayzata MN, 55391 United States	Electronic Service		No	M-25-141
152	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	M-25-141
153	Benjamin	Levine	blevine@mnpower.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	M-25-141
154	Becky	Li	bli@rmi.org			17 State St 25th floor unit 2500 New York NY, 10004 United States	Electronic Service		No	M-25-141
155	Amy	Liberkowsky	amy.a.liberkowsky@xcelenergy.com	Xcel Energy		414 Nicollet Mall 7th Floor Minneapolis MN, 55401-1993 United States	Electronic Service		No	M-25-141

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
156	Carl	Linville	clinville@raponline.org			50 State Street Suite #3 Montpelier VT, 05602 United States	Electronic Service		No	M-25-141
157	Phillip	Lipetsky	greenenergyproductsllc@gmail.com	Green Energy Products		PO Box 108 Springfield MN, 56087 United States	Electronic Service		No	M-25-141
158	Jody	Londo	jody.l.londo@xcelenergy.com	Xcel Energy		414 Nicillet Mall 7th Floor Minneapolis MN, 55401-1993 United States	Electronic Service		No	M-25-141
159	Susan	Ludwig	sludwig@mnpower.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	M-25-141
160	Brian	Lydic	brian@irecusa.org	Interstate Renewable Energy Council, Inc.		PO Box 1156 Latham NY, 12110-1156 United States	Electronic Service		No	M-25-141
161	Madeline	Lydon	madeline.k.lydon@xcelenergy.com	Xcel Energy		401 NICOLLET MALL Floor 7 Minneapolis MN, 55401 United States	Electronic Service		No	M-25-141
162	Richard	Macke	macker@powersystem.org	Power System Engineering, Inc.		10710 Town Square Dr NE Ste 201 Minneapolis MN, 55449 United States	Electronic Service		No	M-25-141
163	Alice	Madden	alice@communitypowermn.org	Community Power		2720 E 22nd St Minneapolis MN, 55406 United States	Electronic Service		No	M-25-141
164	Alex	Magerko	amagerko@epri.com	EPRI		942 Corridor Park Blvd Knoxville TN, 37932 United States	Electronic Service		No	M-25-141
165	Kavita	Maini	kmairi@wi.rr.com	KM Energy Consulting, LLC		961 N Lost Woods Rd Oconomowoc WI, 53066 United States	Electronic Service		No	M-25-141
166	Tom	Mammen	thomas.j.mammen@xcelenergy.com	Xcel Energy		null null, null United States	Electronic Service		No	M-25-141
167	Discovery	Manager	discoverymanager@mnpower.com	Minnesota Power		30 W Superior St Duluth MN, 55802 United States	Electronic Service		No	M-25-141
168	Christine	Marquis	regulatory.records@xcelenergy.com	Xcel Energy		414 Nicollet Mall MN1180-07-MCA Minneapolis MN, 55401 United States	Electronic Service		No	M-25-141
169	Gregg	Mast	gmast@cleanenergyeconomyymn.org	Clean Energy Economy Minnesota		4808 10th Avenue S Minneapolis MN, 55417 United States	Electronic Service		No	M-25-141
170	Erica	McConnell	emcconnell@elpc.org	Environmental Law & Policy Center		35 E. Wacker Drive, Suite 1600	Electronic Service		No	M-25-141

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						Chicago IL, 60601 United States				
171	Jess	McCullough	jmccullough@mnpower.com	Minnesota Power		30 W Superior St Duluth MN, 55802 United States	Electronic Service		No	M-25-141
172	Sara G	McGrane	smcgrane@felhaber.com	Felhaber Larson		220 S 6th St Ste 2200 Minneapolis MN, 55420 United States	Electronic Service		No	M-25-141
173	Natalie	McIntire	natalie.mcintire@gmail.com	Wind on the Wires		570 Asbury St Ste 201 Saint Paul MN, 55104-1850 United States	Electronic Service		No	M-25-141
174	Matthew	Melewski	matthew@theboutiquefirm.com	Nokomis Energy LLC & Ole Solar LLC		2639 Nicollet Ave Ste 200 Minneapolis MN, 55408 United States	Electronic Service		No	M-25-141
175	Thomas	Melone	thomas.melone@allcous.com	Minnesota Go Solar LLC		222 South 9th Street Suite 1600 Minneapolis MN, 55120 United States	Electronic Service		No	M-25-141
176	Michael	Menzel	mike.m@sagiliti.com	Sagiliti		23505 Smithtown Rd. Suite 280 Excelsior MN, 55331 United States	Electronic Service		No	M-25-141
177	Tim	Mergen	tmergen@meeker.coop	Meeker Cooperative Light And Power		1725 US Hwy 12 E. Suite 100 PO Box 68 Litchfield MN, 55355 United States	Electronic Service		No	M-25-141
178	Pontius	Mike	mpontius@mnpower.com			null null, null United States	Electronic Service		No	M-25-141
179	Brian	Millberg	fwengineering@comcast.net			695 Grand Ave #222 Saint Paul MN, 55105 United States	Electronic Service		No	M-25-141
180	Luther	Miller	luther.c.miller@xcelenergy.com	Xcel Energy		null null, null United States	Electronic Service		No	M-25-141
181	Marc	Miller	mmiller@soltage.com	Soltage, LLC		66 York Street, 5th Floor Jersey City NJ, 07302 United States	Electronic Service		No	M-25-141
182	Marcus	Mills	marcus@communitypowermn.org	Community Power		2720 E 22nd St Minneapolis MN, 55406 United States	Electronic Service		No	M-25-141
183	Darrick	Moe	darrick@mrea.org	Minnesota Rural Electric Association		11640 73rd Ave N Maple Grove MN, 55369 United States	Electronic Service		No	M-25-141
184	Dalene	Monsebroten	dalene.monsebroten@nmpagency.com	Northern Municipal Power Agency		123 2nd St W Thief River Falls MN, 56701 United States	Electronic Service		No	M-25-141

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
185	Brian	Monson	brian.t.monson@xcelenergy.com	Xcel Energy		null null, null United States	Electronic Service		No	M-25-141
186	Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP		33 South Sixth St Ste 4200 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-141
187	Susan	Mudd	smudd@elpc.org	Environmental Law and Policy Center		35 E. Wacker Drive, Suite 1600 Chicago IL, 60601 United States	Electronic Service		No	M-25-141
188	Pouya	Najmaie	najm0001@gmail.com	Cooperative Energy Futures		3416 16th Ave S Minneapolis MN, 55407 United States	Electronic Service		No	M-25-141
189	Alex	Nelson	anelson@dakotaelectric.com	Dakota Electric Association		4300 220nd St Farmington MN, 55024 United States	Electronic Service		No	M-25-141
190	Anthony	Nelson	amnelson@otpc.com	Ottertail Power		53233 Sunrise Ln Park Rapids MN, 56470 United States	Electronic Service		No	M-25-141
191	Ben	Nelson	benn@cmpasgroup.org	CMPMA		459 South Grove Street Blue Earth MN, 56013 United States	Electronic Service		No	M-25-141
192	Carl	Nelson	cnelson@mncee.org	Center for Energy and Environment		212 3rd Ave N Ste 560 Minneapolis MN, 55401 United States	Electronic Service		No	M-25-141
193	Darin	Nelson	dnelson@minnetonkamn.gov	City of Minnetonka		14600 Minnetonka Blvd Minnetonka MN, 55345 United States	Electronic Service		No	M-25-141
194	David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency		220 South Sixth Street Suite 1300 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-141
195	Sephra	Ninow	sephra.ninow@energycenter.org	Center for Sustainable Energy		426 17th Street, Suite 700 Oakland CA, 94612 United States	Electronic Service		No	M-25-141
196	Michael	Noble	noble@fresh-energy.org	Fresh Energy		408 Saint Peter St Ste 350 Saint Paul MN, 55102 United States	Electronic Service		No	M-25-141
197	Rolf	Nordstrom	rnordstrom@gpisd.net	Great Plains Institute		2801 21ST AVE S STE 220 Minneapolis MN, 55407-1229 United States	Electronic Service		No	M-25-141
198	Samantha	Norris	samanthanorris@alliantenergy.com	Interstate Power and Light Company		200 1st Street SE PO Box 351 Cedar Rapids IA, 52406-0351 United States	Electronic Service		No	M-25-141

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
199	David	O'Brien	david.obrien@navigant.com	Navigant Consulting		77 South Bedford St Ste 400 Burlington MA, 01803 United States	Electronic Service		No	M-25-141
200	Logan	O'Grady	logrady@mnseia.org	Minnesota Solar Energy Industries Association		2288 University Ave W St. Paul MN, 55114 United States	Electronic Service		No	M-25-141
201	Patty	O'Keefe	patty.okeefe@sierraclub.org			2525 Emerson Ave S Apt 2 Minneapolis MN, 55405 United States	Electronic Service		No	M-25-141
202	Timothy	O'Leary	toleary@llec.coop	Lyon-Lincoln Electric Cooperative, Inc		P.O. Box 639 Tyler MN, 56178-0639 United States	Electronic Service		No	M-25-141
203	Jeff	O'Neill	jeff.oneill@ci.monticello.mn.us	City of Monticello		505 Walnut Street Suite 1 Monticello MN, 55362 United States	Electronic Service		No	M-25-141
204	Matthew	Olsen	molsen@otpc.com	Otter Tail Power Company		215 South Cascade Street Fergus Falls MN, 56537 United States	Electronic Service		No	M-25-141
205	Russell	Olson	rolson@hcpd.com	Heartland Consumers Power District		PO Box 248 Madison SD, 57042-0248 United States	Electronic Service		No	M-25-141
206	Wendi	Olson	wolson@otpc.com	Otter Tail Power Company		215 South Cascade Street Fergus Falls MN, 56537 United States	Electronic Service		No	M-25-141
207	Carol A.	Overland	overland@legalelectric.org	Legalelectric - Overland Law Office		1110 West Avenue Red Wing MN, 55066 United States	Electronic Service		No	M-25-141
208	Bethany	Owen	bowen@mnpower.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	M-25-141
209	Cezar	Panait	cezar.panait@state.mn.us		Public Utilities Commission	121 7th Place East Suite 350 St. Paul MN, 55101 United States	Electronic Service		No	M-25-141
210	Dan	Patry	dpatry@sunedison.com	SunEdison		600 Clipper Drive Belmont CA, 94002 United States	Electronic Service		No	M-25-141
211	Jeffrey C	Paulson	jeff.jcplaw@comcast.net	Paulson Law Office, Ltd.		4445 W 77th Street Suite 224 Edina MN, 55435 United States	Electronic Service		No	M-25-141
212	Dean	Pawlowski	dpawlowski@otpc.com	Otter Tail Power Company		PO Box 496 215 S. Cascade St. Fergus Falls MN, 56537-0496 United States	Electronic Service		No	M-25-141

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
213	Susan	Peirce	susan.peirce@state.mn.us		Department of Commerce	85 Seventh Place East St. Paul MN, 55101 United States	Electronic Service		No	M-25-141
214	Mary Beth	Peranteau	mperanteau@fredlaw.com	Fredrikson & Byron, P.A.		44 East Mifflin Street Suite 1000 Madison WI, 53703 United States	Electronic Service		No	M-25-141
215	Jennifer	Peterson	jjpeterson@mnpower.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	M-25-141
216	Wess	Pfaff	wes.pfaff@mrenergy.com			null null, null United States	Electronic Service		No	M-25-141
217	Ryan	Pierce	ryan.m.pierce@xcelenergy.com	Xcel Energy		null null, null United States	Electronic Service		No	M-25-141
218	Morgan	Pitz	morgan.pitz@us-solar.com	US Solar		100 N 6th St #410B Minneapolis MN, 55403 United States	Electronic Service		No	M-25-141
219	Hannah	Polikov	hpolikov@aee.net	Advanced Energy Economy Institute		1000 Vermont Ave, Third Floor Washington DC, 20005 United States	Electronic Service		No	M-25-141
220	Crystal	Pomerleau	crystal.r.pomerleau@xcelenergy.com	Xcel		null null, null United States	Electronic Service		No	M-25-141
221	Kristel	Porter	kristel@mnrenewablenow.org	MN Renewable Now		null null, null United States	Electronic Service		No	M-25-141
222	Paula	Prahl	paula.prahl@dominiuminc.com	Dominium		2905 Northwest Blvd Ste 150 Plymouth MN, 55441 United States	Electronic Service		No	M-25-141
223	Kevin	Pranis	kpranis@liunagroc.com	Laborers' District Council of MN and ND		81 E Little Canada Road St. Paul MN, 55117 United States	Electronic Service		No	M-25-141
224	Matt	Privratsky	matt@nokomisenergy.com	Nokomis Energy		2639 Nicollet Ave Suite 200 Minneapolis MN, 55408 United States	Electronic Service		No	M-25-141
225	Elizabeth	Psihos	elizabeth.psihos@idealenergies.com			null null, null United States	Electronic Service		No	M-25-141
226	Bridget	Rathsack	bridget.rathsack@burnsvillemn.gov	City of Burnsville, MN		100 Civic Center Parkway Burnsville MN, 55337 United States	Electronic Service		No	M-25-141
227	Peter	Reese	preese@sundialsolarenergy.com	Sundial Energy, LLC		3363 Republic Ave Saint Louis Park MN, 55426 United States	Electronic Service		No	M-25-141
228	Generic Notice	Regulatory	regulatory_filing_coordinators@otpc.com	Otter Tail Power Company		215 S. Cascade Street Fergus Falls	Electronic Service		No	M-25-141

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						MN, 56537 United States				
229	John C.	Reinhardt		Laura A. Reinhardt		3552 26th Ave S Minneapolis MN, 55406 United States	Paper Service		No	M-25-141
230	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	M-25-141
231	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	M-25-141
232	Micah	Revell	mrevell@winthrop.com	Winthrop & Weinstine, P.A.		3500 Capella Tower 225 S. 6th Street Minneapolis MN, 55402 United States	Electronic Service		No	M-25-141
233	Michael	Riewer	mriewer@otpco.com	Otter Tail Power Company		PO Box 4496 Fergus Falls MN, 56538-0496 United States	Electronic Service		No	M-25-141
234	Jonathan	Roberts	jroberts@soltage.com	Soltage		66 York St 5th Floor Jersey City NJ, 07302 United States	Electronic Service		No	M-25-141
235	Noah	Roberts	nroberts@cleanpower.org	Energy Storage Association		1155 15th St NW, Ste 500 Washington DC, 20005 United States	Electronic Service		No	M-25-141
236	Kristi	Robinson	krobinson@star-energy.com	STAR Energy Services, LLC		1401 South Broadway Pelican Rapids MN, 56572 United States	Electronic Service		No	M-25-141
237	Daniel	Rogers	dan@nokomispartners.com			2639 Nicollet Ave Ste 200 Minneapolis MN, 55408 United States	Electronic Service		No	M-25-141
238	Michael	Ruiz	michael.ruiz@xcelenergy.com	Xcel Energy		null null, null United States	Electronic Service		No	M-25-141
239	Nathaniel	Runke	nrunke@local49.org			611 28th St. NW Rochester MN, 55901 United States	Electronic Service		No	M-25-141
240	Darla	Ruschen	d.ruschen@bcrea.coop	Brown County Rural Electrical Association		PO Box 529 24386 State Highway 4 Sleepy Eye MN, 56085 United States	Electronic Service		No	M-25-141
241	Delaney	Russell	delaney@mnipl.org	Just Solar Coalition		4407 E Lake Street Minneapolis MN, 55407 United States	Electronic Service		No	M-25-141
242	Kwadwo	Safo	ksafo@dakotaelectric.com	Dakota Electric Association		null null, null United States	Electronic Service		No	M-25-141

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
243	Robert K.	Sahr	bsahr@eastriver.coop	East River Electric Power Cooperative		P.O. Box 227 Madison SD, 57042 United States	Electronic Service		No	M-25-141
244	Ian	SantosMeeker	ians@ips-solar.com	IPS Solar		null null, null United States	Electronic Service		No	M-25-141
245	Joseph L	Sathe	jsathe@kennedy-graven.com	Kennedy & Graven, Chartered		150 S 5th St Ste 700 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-141
246	Elena	Saxonhouse	elena.saxonhouse@sierraclub.org	Sierra Club Environmental Law Program		2101 Webster St Ste 1300 Oakland CA, 94612 United States	Electronic Service		No	M-25-141
247	Kenric	Scheevel	kjs@dairynet.com	Dairyland Power Cooperative		3200 East Ave S PO Box 817 La Crosse WI, 54602 United States	Electronic Service		No	M-25-141
248	Dean	Schiro	dean.e.schiro@xcelenergy.com	Xcel Energy		null null, null United States	Electronic Service		No	M-25-141
249	Jacob J.	Schlesinger	jschlesinger@keyesfox.com	Keyes & Fox LLP		1580 Lincoln St Ste 880 Denver CO, 80203 United States	Electronic Service		No	M-25-141
250	Jeff	Schoenecker	jschoenecker@dakotaelectric.com	Dakota Electric Association		4300 220th Street W Farmington MN, 55024 United States	Electronic Service		No	M-25-141
251	Peter	Scholtz	peter.scholtz@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	Suite 1400 445 Minnesota Street St. Paul MN, 55101-2131 United States	Electronic Service		No	M-25-141
252	Kay	Schraeder	kschraeder@minnkota.com	Minnkota Power		5301 32nd Ave S Grand Forks ND, 58201 United States	Electronic Service		No	M-25-141
253	Matthew	Schuerger	matthew.schuerger@state.mn.us		Public Utilities Commission	121 7th Place East Suite 350 St. Paul MN, 55101 United States	Electronic Service		No	M-25-141
254	Ronald J.	Schwartau	rschwartau@noblesce.com	Nobles Electric Cooperative		22636 U.S. Hwy. 59 Worthington MN, 56187 United States	Electronic Service		No	M-25-141
255	Rob	Scott Hovland	rob.scott-hovland@mrenergy.com	Missouri River Energy Services		3724 W Avera Dr PO Box 88920 Sioux Falls SD, 57109-8920 United States	Electronic Service		No	M-25-141
256	Emma	Searson	esearson@solarunitedneighbors.org	Solar United Neighbors		646 S Barrington Ave Apt 101 Los Angeles CA, 90049 United States	Electronic Service		No	M-25-141
257	Dean	Sedgwick	sedgwick@itascapower.com	Itasca Power Company		PO Box 455 Spring Lake MN, 56680 United States	Electronic Service		No	M-25-141

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
258	Maria	Seidler	maria.seidler@dom.com	Dominion Energy Technology		120 Tredegar Street Richmond VA, 23219 United States	Electronic Service		No	M-25-141
259	David	Shaffer	david.shaffer@novelenergy.biz	Novel Energy Solutions		2303 Wycliff St Ste 300 St. Paul MN, 55114 United States	Electronic Service		No	M-25-141
260	Patricia	Sharkey	psharkey@environmentallawcounsel.com	Midwest Cogeneration Association.		180 N LaSalle St Ste 3700 Chicago IL, 60601 United States	Electronic Service		No	M-25-141
261	Christopher L.	Sherman	csherman@sherman-associates.com	Solar Holdings LLC		233 Park Ave S Ste 201 Minneapolis MN, 55415 United States	Electronic Service		No	M-25-141
262	Doug	Shoemaker	dougs@charter.net	Minnesota Renewable Energy		2928 5th Ave S Minneapolis MN, 55408 United States	Electronic Service		No	M-25-141
263	Felicia	Skaggs	fskaggs@meeker.coop	Meeker Cooperative Light & Power		1725 US Highway 12 E Suite 100 Litchfield MN, 55355 United States	Electronic Service		No	M-25-141
264	Glen	Skarbakka	glen@s-pllc.com	Skarbakka PLLC		5411 Bartlett Blvd Mound MN, 55364 United States	Electronic Service		No	M-25-141
265	Anne	Smart	anne.smart@chargepoint.com	ChargePoint, Inc.		254 E Hacienda Ave Campbell CA, 95008 United States	Electronic Service		No	M-25-141
266	Joshua	Smith	joshua.smith@sierraclub.org			85 Second St FL 2 San Francisco CA, 94105 United States	Electronic Service		No	M-25-141
267	Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.		76 W Kellogg Blvd St. Paul MN, 55102 United States	Electronic Service		No	M-25-141
268	Trevor	Smith	trevor.smith@avantenergy.com	Avant Energy, Inc.		220 South Sixth Street Suite 1300 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-141
269	Rafi	Sohail	rafi.sohail@centerpointenergy.com	CenterPoint Energy		800 LaSalle Avenue P.O. Box 59038 Minneapolis MN, 55459-0038 United States	Electronic Service		No	M-25-141
270	Beth	Soholt	bsoholt@cleangridalliance.org	Clean Grid Alliance		570 Asbury Street Suite 201 St. Paul MN, 55104 United States	Electronic Service		No	M-25-141
271	Marcia	Solie	m.solie@bcrea.coop	Brown County Rural Electrical Association		24386 State Hwy. 4, PO Box 529 Sleepy Eye MN, 56085 United States	Electronic Service		No	M-25-141

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272	Braden	Solum	braden.solum@idealenergies.com	iDEAL Energies		5810 Nicollet Ave Minneapolis MN, 55419 United States	Electronic Service		No	M-25-141
273	Karl	Sonneman	karl17@hbci.com	Law Office of Karl W. Sonneman		111 Riverfront Suite 202 Winona MN, 55987 United States	Electronic Service		No	M-25-141
274	Brandon	Stamp	brandon.j.stamp@xcelenergy.com	Xcel Energy		401 Nicollet Mall Minneapolis MN, 55401 United States	Electronic Service		No	M-25-141
275	Sky	Stanfield	stanfield@smwlaw.com	Shute, Mihaly & Weinberger		396 Hayes Street San Francisco CA, 94102 United States	Electronic Service		No	M-25-141
276	Russ	Stark	russ.stark@ci.stpaul.mn.us	City of St. Paul		Mayor's Office 15 W. Kellogg Blvd., Suite 390 Saint Paul MN, 55102 United States	Electronic Service		No	M-25-141
277	Byron E.	Starns	byron.starns@stinson.com	STINSON LLP		50 S 6th St Ste 2600 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-141
278	Kristin	Stastny	kstastny@taftlaw.com	Taft Stettinius & Hollister LLP		2200 IDS Center 80 South 8th Street Minneapolis MN, 55402 United States	Electronic Service		No	M-25-141
279	Lindsey	Stegall	lindsey.stegall@evgo.com	EVgo Services, LLC		11835 W Olympic Blvd Ste 900E Los Angeles CA, 90064 United States	Electronic Service		No	M-25-141
280	Cary	Stephenson	cstephenson@otpc.com	Otter Tail Power Company		215 South Cascade Street Fergus Falls MN, 56537 United States	Electronic Service		No	M-25-141
281	Chad	Stevenson	chad.stevenson@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	445 Minnesota St. Suite 1400 St. Paul MN, 55101 United States	Electronic Service		No	M-25-141
282	Tammy	Sundbom	tsundbom@mnpower.com	Minnesota Power		null null, null United States	Electronic Service		No	M-25-141
283	Sherry	Swanson	sswanson@noblesce.com	Nobles Cooperative Electric		PO Box 58 Slayton MN, 56172 United States	Electronic Service		No	M-25-141
284	Boratha	Tan	btan@votesolar.org	Vote Solar		null null, null United States	Electronic Service		No	M-25-141
285	Bryant	Tauer	btauer@whe.org	Wright-Hennepin		6800 Electric Dr Rockford MN, 55373 United States	Electronic Service		No	M-25-141
286	Dean	Taylor	dtaylor@pluginamerica.org	Plug In America		6380 Wilshire Blvd, Suite 1000 Los Angeles CA, 90048 United States	Electronic Service		No	M-25-141

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287	Whitney	Terrill	whitney@mnipl.org	Minnesota Interfaith Power & Light		null null, null United States	Electronic Service		No	M-25-141
288	Daniel	Tikk	daniel.tikk@state.mn.us		Department of Commerce	85 7th Place East Suite 280 Saint Paul MN, 55101 United States	Electronic Service		No	M-25-141
289	Kate	Tohme	ktohme@newleafenergy.com	New Leaf Energy		null null, null United States	Electronic Service		No	M-25-141
290	Taige	Tople	taige.d.tople@xcelenergy.com	Northern States Power Company dba Xcel Energy-Elec		414 Nicollet Mall 401 7th Floor Minneapolis MN, 55401 United States	Electronic Service		No	M-25-141
291	Jason	Topp	jason.topp@lumen.com	Qwest Communications Company, LLC.		200 S 5th St Ste 2200 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-141
292	Emma Marshall	Torres	emarshall-torres@convergentep.com			null null, null United States	Electronic Service		No	M-25-141
293	Zack	Townsend	zachary.townsend@brookfieldrenewable.com	Brookfield Renewable		200 Liberty St FL 14 New York NY, 10281 United States	Electronic Service		No	M-25-141
294	Pat	Treseler	pat.jcplaw@comcast.net	Paulson Law Office LTD		4445 W 77th Street Suite 224 Edina MN, 55435 United States	Electronic Service		No	M-25-141
295	Jeff	Triplett	triplettj@powersystem.org	MREA		10710 Town Square Dr NW St 201 Minneapolis MN, 55449 United States	Electronic Service		No	M-25-141
296	Adam	Tromblay	atromblay@noblesce.com	Nobles Cooperative Electric		P.O. Box 58 Slayton MN, 56127-0058 United States	Electronic Service		No	M-25-141
297	Lise	Trudeau	lise.trudeau@state.mn.us		Department of Commerce	85 7th Place East Suite 500 Saint Paul MN, 55101 United States	Electronic Service		No	M-25-141
298	Alan	Urban	alan.m.urban@xcelenergy.com	Xcel Energy		null null, null United States	Electronic Service		No	M-25-141
299	Matt	Van Arkel	mvanarkel@newleafenergy.com			55 Technology Drive Suite 102 Lowell MA, 01851 United States	Electronic Service		No	M-25-141
300	Gary	Van Winkle	gvanwinkle@mylegalaid.org	Mid-Minnesota Legal Aid		111 N Fifth St Ste 100 Minneapolis MN, 55403 United States	Electronic Service		No	M-25-141
301	John	Vaughn	nik@rreal.org	Rural Renewable Energy Alliance		3963 8th Street SW Backus MN, 55435 United States	Electronic Service		No	M-25-141
302	Ellen	Veazey	lveazey@solarunitedneighbors.org	Solar United Neighbors		1350 Connecticut Ave NW Ste 412	Electronic Service		No	M-25-141

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303	Sam	Villella	sdvillella@gmail.com			10534 Alamo Street NE Blaine MN, 55449 United States	Electronic Service		No	M-25-141
304	Curt	Volkman	curt@newenergy-advisors.com	Fresh Energy		408 St Peter St Saint Paul MN, 55102 United States	Electronic Service		No	M-25-141
305	Wendy	Vorasane	wendy.vorasane@idealenergies.com			null null, null United States	Electronic Service		No	M-25-141
306	Robert J.V.	Vose	rvose@kennedy-graven.com	Kennedy & Graven, Chartered		150 S 5th St Ste 700 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-141
307	Stacy	Wahlund	swahlund@otpc.com	Otter Tail Power Company		215 S. Cascade St Fergus Falls MN, 56537 United States	Electronic Service		No	M-25-141
308	Sarah	Walinga	swalinga@solarcity.com	Energy Freedom Coalition		3055 Clearview Way San Mateo MN, 94402 United States	Electronic Service		No	M-25-141
309	Kevin	Walker	kwalker@beaconinterfaith.org	Beacon Interfaith Housing Collaborative		null null, null United States	Electronic Service		No	M-25-141
310	Roger	Warehime	roger.warehime@owatonnautilities.com	Owatonna Municipal Public Utilities - Gas		208 S Walnut Ave PO BOX 800 Owatonna MN, 55060 United States	Electronic Service		No	M-25-141
311	Jenna	Warmuth	jwarmuth@mnpower.com	Minnesota Power		30 W Superior St Duluth MN, 55802-2093 United States	Electronic Service		No	M-25-141
312	Samantha	Weaver	samantha@communitysolaraccess.org	Coalition for Community Solar Access		1380 Monroe St. Washington DC DC, 20010 United States	Electronic Service		No	M-25-141
313	Elizabeth	Wefel	eawefel@flaherty-hood.com	Missouri River Energy Services		525 Park St Ste 470 Saint Paul MN, 55103 United States	Electronic Service		No	M-25-141
314	Sarah	Whebbe	swhebbe@mnseia.org	MnSEIA		445 Minnesota Street Suite 730 St. Paul MN, 55101 United States	Electronic Service		No	M-25-141
315	Joshua	Williams	joshua@highlandfleets.com	Highland Electric Fleets		200 Cummings Center Suite 273-D Beverly MA, 01915 United States	Electronic Service		No	M-25-141
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						80202 United States				
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318	Anthony	Willingham	anthony.willingham@electrifyamerica.com	Electrify America		1950 Opportunity Way Suite 1500 Reston VA, 20190 United States	Electronic Service		No	M-25-141
319	Danielle	Winner	danielle.winner@state.mn.us		Department of Commerce	85 7th Place East Suite 500 Saint Paul MN, 55101 United States	Electronic Service		No	M-25-141
320	Heidi	Winter	hwinter@co.murray.mn.us	Murray County		2500 28th Street PO Box 57 Slayton MN, 56172 United States	Electronic Service		No	M-25-141
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322	Terry	Wolf	terry.wolf@mrenergy.com	Missouri River Energy Services		3724 W Avera Dr PO Box Sioux Falls SD, 57109-8920 United States	Electronic Service		No	M-25-141
323	Curtis	Zaun	curtis@cpzlaw.com			3254 Rice Street Little Canada MN, 55126 United States	Electronic Service		No	M-25-141
324	Brian	Zavesky	brianz@mrenergy.com	Missouri River Energy Services		3724 West Avera Drive P.O. Box 88920 Sioux Falls SD, 57108-8920 United States	Electronic Service		No	M-25-141
325	Christopher	Zibart	czibart@atcllc.com	American Transmission Company LLC		W234 N2000 Ridgeview Pkwy Court Waukesha WI, 53188-1022 United States	Electronic Service		No	M-25-141
326	Kurt	Zimmerman	kwz@ibew160.org	Local Union #160, IBEW		2909 Anthony Ln St Anthony Village MN, 55418-3238 United States	Electronic Service		No	M-25-141
327	Emily	Ziring	eziring@stlouispark.org	City of St. Louis Park		5005 Minnetonka Blvd St. Louis Park MN, 55416 United States	Electronic Service		No	M-25-141
328	Ari	Zwick	ari.zwick@state.mn.us		Department of Commerce	85 7th Place East Suite 280 Saint Paul MN, 55101 United States	Electronic Service		No	M-25-141