

BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

Katie J. Sieben  
Valerie Means  
Matthew Schuerger  
Joseph K. Sullivan  
John A. Tuma

Chair  
Commissioner  
Commissioner  
Commissioner  
Commissioner

In the Matter of the Application of Big Bend Wind, LLC for a Certificate of Need for the up to 300 MW Big Bend Wind Project in Cottonwood and Watonwan Counties, Minnesota.

ISSUE DATE: September 28, 2022

DOCKET NO. IP-7013/CN-19-408

In the Matter of the Application of Big Bend Wind, LLC for a Large Wind Energy Conversion System Site Permit for the up to 300 MW Big Bend Wind Project in Cottonwood and Watonwan Counties, Minnesota.

DOCKET NO. IP-7013/WS-19-619

In the Matter of the Application of Big Bend Wind, LLC for a Route Permit for a 161 kV High Voltage Transmission Line in Cottonwood, Watonwan and Martin Counties, Minnesota.

DOCKET NO. IP-7013/TL-19-621

In the Matter of the Application of Red Rock Solar, LLC for a Certificate of Need for the up to 60 MW Red Rock Solar Project in Cottonwood County, Minnesota.

DOCKET NO. IP-7014/CN-19-486

In the Matter of the Application of Red Rock Solar, LLC for a Site Permit for the up to 60 MW Red Rock Solar Project in Cottonwood County, Minnesota.

DOCKET NO. IP-7014/GS-19-620

ORDER ISSUING PERMITS

**PROCEDURAL HISTORY**

On June 19, 2019, Big Bend Wind, LLC (Big Bend) and Red Rock Solar, LLC (Red Rock) (jointly, the Applicants)<sup>1</sup> filed a request for exemptions from certain certificate of need

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<sup>1</sup> Both Applicants are subsidiary project companies of Apex Clean Energy Holdings, Inc.

application content requirements under Minn. R. 7849, as well as notice plan filing requirements under Minn. R. 7829.2550.

On September 24, 2019, the Commission issued an order granting exemptions from certain certificate of need application content requirements requested by the Applicants.<sup>2</sup>

On August 27, 2020, Red Rock filed a letter stating its intent to file a site permit application under the alternative permitting process.

Also on August 27, 2020, Big Bend filed a letter stating its intent to file a route permit application under the alternative permitting process.

On November 9, 2020, Big Bend filed three separate applications in support of its proposed up to 308-megawatt (MW) wind farm and 18-mile 161 kilovolt (kV) transmission line to be located in portions of Cottonwood, Martin, and Watonwan counties (collectively, the Wind Project):

- a certificate of need application for the wind farm and the associated 161 kV transmission line (Docket No. IP-7013/CN-19-408);
- a large wind energy conversion system (LWECS) site permit application (Docket No. IP-7013/WS-19-619); and
- a high-voltage transmission line (HVTL) route permit application for the proposed 161 kV transmission line (Docket No. IP-7013/TL-19-621).

Also on November 9, 2020, Red Rock filed separate applications for a certificate of need (Docket No. IP-7014/CN-19-486) and site permit (Docket No. IP-7014/GS-19-620) for an up to 60 MW solar energy conversion facility (the Solar Project).

On December 18, 2020, the Minnesota Historical Society filed a petition to intervene in the Wind Project.

On March 11, 2021, the Commission issued an order accepting the Applicants' certificate of need, route permit, and site permit applications as substantially complete (Order Accepting Applications).<sup>3</sup> Among other things, the Commission:

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<sup>2</sup> *In the Matter of the Application of Big Bend Wind, LLC and Red Rock Solar, LLC for a Certificate of Need for an up to 335-MW Wind Project and an up to 75-MW Solar Large Energy Facility with an Associated 30-mile, 161-kV High Voltage Transmission Line in Cottonwood, Martin, and Jackson Counties*, Docket Nos. IP-7013/CN-19-408, IP-7014/CN-19-486, Order Approving Exemptions to Certain Filing Requirements (September 24, 2019).

<sup>3</sup> *In the Matter of the Applications of Big Bend Wind, LLC for a Certificate of Need, Site Permit, and Route Permit for an up to 308 MW Wind Farm and Associated 161 kV Transmission Line in Cottonwood, Martin, and Watonwan Counties*, Docket Nos. IP-7013/CN-19-408, IP-7013/WS-19-619, IP-7013/TL-19-621, and *In the Matter of the Applications of Red Rock Solar, LLC for a Certificate of Need and a Site Permit for an up to 60 MW Solar Facility in Cottonwood County*, Docket Nos. IP-7014/CN-19-486, IP-7014/GS-19-620, Order Accepting Applications as Complete, Establishing Review Procedures, Granting Variances, and Notice of and Order for Hearing (March 11, 2021).

- referred Big Bend's site permit application to the Office of Administrative Hearings (OAH) for a contested case proceeding;
- referred Big Bend's route permit application and Red Rock's site permit application to the OAH for review under the alternative permitting process defined in Minn. Stat. § 216E.04 and Minn. R. 7850.2800 to 7850.3900; and
- authorized joint public meetings, joint public hearings, and combined environmental review of Big Bend's certificate of need, site permit, and route permit applications and Red Rock's certificate of need and site permit applications to the extent practicable, including the preparation of an Environmental Assessment (EA).

On March 17, 2021, the Commission issued a Notice of Public Information and Environmental Review Scoping Meeting and sought public comment on the proposed Wind and Solar Projects.

On April 1, 2021, Commission staff and the Department of Commerce, Energy Environmental Review and Analysis (DOC-EERA) staff held a joint public information and EA scoping meeting.

On May 24, 2021, DOC-EERA filed its scoping summary and recommendations regarding the EA scoping process.

On June 3, 2021, DOC-EERA filed comments recommending that the Commission issue a draft site permit for the Wind Project.

On July 22, 2021, the Commission approved the draft site permit for the Wind Project and requested that DOC-EERA include an additional route segment alternative in the scope of the EA for the proposed HVTL.<sup>4</sup>

By August 18, 2021, the Administrative Law Judge (ALJ) admitted the following as full parties to the proceeding (collectively, the Intervening Parties):

- Upper Sioux Community Tribal Historic Preservation Office
- Lower Sioux Indian Community
- The Laborers District Council of Minnesota and North Dakota (LIUNA)

On August 24, 2021, DOC-EERA issued its EA Scoping Decision.

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<sup>4</sup> *In the Matter of the Application of Big Bend Wind, LLC for a Large Wind Energy Conversion System Site Permit for the up to 308 MW Big Bend Wind Project in Cottonwood and Watonwan Counties, Minnesota*, Docket No. IP-7013/WS-19-619, *In the Matter of the Application of Big Bend Wind, LLC for a Route Permit for a 161 kV High Voltage Transmission Line in Cottonwood, Watonwan and Martin Counties, Minnesota*, Docket No. IP-7013/TL-19-621, and *In the Matter of the Application of Red Rock Solar, LLC for a Site Permit for the up to 60 MW Red Rock Solar Project in Cottonwood County, Minnesota*, Docket No. IP-7014/GS-19-620 Order Identifying Additional Route Segment and Issuing Draft Site Permit (July 22, 2021).

On September 14, 2021, the Applicants and the Intervening Parties entered into a settlement agreement regarding the expressed concern of the proximity of the turbine locations associated with the Wind Project to the Jeffers Petroglyphs and the Red Rock Ridge.

On September 20, 2021, Big Bend filed its Supplemental and Amended Site Permit Application.

On October 15, 2021, DOC-EERA filed a Notice of Substantial Changes and Substantial New Information and Comment Period on Reevaluation of the EA Scope.

On November 1, 2021, the Applicants submitted scoping comments for the revised EA.

On November 5, 2021, DOC-EERA issued a Revised EA Scoping Decision.

On January 18, 2022, DOC-EERA issued an EA.<sup>5</sup>

On January 26 and 28, 2022, the Department of Commerce, Division of Energy Resources (DOC-DER) filed comments recommending that the Commission grant the Applicants' certificate of need requests for the Wind and Solar Projects.

On February 1 and 2, 2022, the ALJ held joint public hearings in-person and by video conference and telephone on the Applicants' proposed projects.

By February 22, 2022, the Commission received written comments from members of the public, along with the following:

- The International Union of Operating Engineers, Local 49 (Local 49)
- The North Central States Regional Council of Carpenters
- The Minnesota Department of Natural Resources.
- DOC-EERA
- the Applicants

On March 18, 2022, the Applicants filed a post hearing brief and combined proposed findings of fact, conclusions of law, and recommendations.

On April 29, 2022, the ALJ issued a Findings of Fact, Conclusions of Law, and Recommendations (ALJ's Report).

On May 12, 2022, the Commission requested comments from the State Historic Preservation Office (SHPO) regarding the Wind Project in the area of the Jeffers Petroglyphs.

On May 16, 2022, DOC-EERA filed exceptions to the ALJ's Report.

On June 26, 2022, the SHPO filed comments.

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<sup>5</sup> On January 25 and February 8, 2022, DOC-EERA issued corrections to the EA

On June 29, 2022, Big Bend filed a response to DOC-EERA's request for a Wake Loss Analysis.

On August 18, 2022, DOC-EERA filed a proposed revision to Red Rock Solar Site Permit Condition 4.3.15.

On August 18, 2022, the Commission met to consider the matter.

## **FINDINGS AND CONCLUSIONS**

### **I. Summary of Commission Action**

In this order, the Commission will (1) adopt the ALJ's Report, (2) find that the EA and the record address the issues identified in the scoping decision, (3) grant the certificate of need for the Wind Project, (4) issue the site permit for the Wind Project, (5) issue the route permit for the Wind Project, (6) grant the certificate of need for the Solar Project, and (7) issue the site permit for the Solar Project.

### **II. The Projects**

The Wind and Solar Projects have been proposed as a hybrid renewable energy generation project (the Hybrid Project), which could generate up to a total of 335 MW of electricity.<sup>6</sup> The LWECS could generate up to 300 MW of electricity, the Solar Project would generate up to 60 MW of electricity, and the proposed 18-mile 161 kV HVTL would be utilized to deliver the electricity generated to the grid.

The Applicants stated the total energy generation at the Wind Project would be adjusted to not exceed a total of up to 335 MW for the Hybrid Project.

#### **A. The Wind Project**

The proposed Wind Project would be an up to 300 MW nameplate capacity wind farm with associated facilities, consisting of up to 52 wind turbines. Big Bend would construct approximately 18 miles of a new, single circuit, 161 kV transmission line needed to interconnect the proposed Wind Project to a step-up substation before connection to the existing Xcel Energy Crandall 345 kV switching station in Martin County, Minnesota.

The power generated by the Wind Project would be offered for sale to wholesale customers, including Minnesota utilities and cooperatives that have identified a need for additional renewable energy.

Big Bend seeks permitting approval from the Commission through a LWECS site permit for the following associated facilities: permanent meteorological towers and other weather data collection systems, up to four Aircraft Detection Lighting Systems radars, an electrical collection

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<sup>6</sup> Big Bend initially filed applications with the Commission for a certificate of need, a site permit, and a route permit for an up-to 308 MW large wind energy conversion system and an approximately 18-mile 161kV transmission line.

and communications system, access roads, temporary laydown and staging areas, the Wind Project Substation, and associated equipment, and an Operations and Maintenance facility.

## **B. The Solar Project**

Red Rock is proposing to construct an up to 60 MW AC solar photovoltaic (PV) facility located in Midway Township, Cottonwood County

The Solar Project's primary components include solar panels and racking, inverters, security fencing, a substation, electrical collection and communication lines, stormwater basins, laydown areas, and up to three weather stations. Associated facilities include approximately 3 miles of underground 34.5 kV collection lines connecting to the 34.5/161 kV step-up substation.

The Solar Project has been proposed to be constructed and operated only in combination with the proposed Wind Project.

## **III. Environmental Review**

Environmental review must be completed prior to the Commission's decisions on the certificate of need applications, site permits, and route permits.<sup>7</sup> Minn. R. 7849.1000 to 7849.2100, establish the requirements governing preparation of an environmental report (ER) for a large energy facility requiring a certificate of need.<sup>8</sup>

Before the Commission may issue site or route permits for HVTLs or solar energy generation systems, DOC-EERA must prepare an environmental assessment (EA) containing information on the human and environmental impacts of the proposed project, alternative sites or routes and mitigation measures for all sites or routes considered.

### **A. EA in lieu of an ER**

Under Minn. R. 7849.1900, when the applicant for a certificate of need for a large energy facility applies to the Commission for a site permit or route permit prior to the time the DOC-EERA completes the ER for the certificate of need, DOC-EERA may elect to prepare an EA in lieu of the required ER. In its Order Accepting Applications, the Commission approved joint public meetings and hearings and combined environmental review on the Wind and Solar Project applications and requested that DOC-EERA prepare an EA in lieu of an ER.

Minn. R. 7850.3700, subp. 4, requires that the EA include a description of the proposed facility, a list and feasibility analysis of any alternative routes considered, a discussion of the potential impacts on the human and natural environment, a discussion of measures that could reasonably

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<sup>7</sup> The completion of an ER is required for the necessary certificate of need approvals, and the Solar Project Site Permit and the Wind HVTL Route Permit require the completion of an EA.

<sup>8</sup> Minn. R. 7849.1200. The ER is shaped by a scoping process in which members of the public may suggest alternatives, potential impacts, and mitigation opportunities to address in the ER. Minn. R. 7849.1400, subps. 1—4. The Department of Commerce then issues a scoping decision and prepares an ER according to the designated scope. Minn. R. 7849.1400, subp. 7. Minn. R. 7849.1000 to 7849.2100, establishes the requirements concerning preparation of an ER for a large energy facility requiring a certificate of need.

be used to mitigate adverse impacts, a list of required permits, and a discussion of other matters identified during scoping.

## **B. Content of the Scoping Decision and Environmental Assessment**

The EA is shaped by a scoping process in which members of the public may suggest alternative sites, impacts, and mitigation measures to consider. DOC-EERA received comments from members of the public, the Intervening Parties, the Minnesota Department of Natural Resources (MN DNR), and Minnesota Department of Transportation (MnDOT) recommending issues to be considered and studied in the EA.

The scoping decision identifies the issues to be addressed in the EA, including impacts on human settlement, land-based economies, archaeological and historic resources, and the natural environment, in addition to reasonable mitigative measures.

The EA prepared for the Hybrid Project contains thorough analyses of the potential project impacts identified in the scoping decision and possible mitigation measures. Additionally, it analyzes the impacts, feasibility, and availability of the alternatives identified in the scoping decision, including comparisons between each alternative and the project as proposed. The EA also includes the information that would have otherwise been required in an ER for a certificate of need by Minn. R. 7849.1500. This includes evaluating matters of size, type, and timing that would normally be excluded in an EA for a site permit application.

No party disputed that the EA satisfies Minn. R. 7850.3700 and Minn. R. 7849.1500.

## **C. ALJ Report**

The ALJ concluded that DOC-EERA conducted an appropriate environmental analysis of the Project and that the EA satisfies Minn. R. 7850.3700.

## **D. Commission Action**

Minn. R. 7850.3900, subp. 2, requires the Commission to determine whether the EA and the record address the issues identified in the scoping decision.

The Commission has reviewed the EA and concurs with the ALJ that the EA prepared by DOC-EERA satisfies the requirements under Minn. R. 7850.3700 and Minn. R. 7849.1500. The EA addresses the issues identified in the Revised Scoping Decision to a reasonable extent considering the availability of information, and the EA includes the items required by Minn. R. 7850.3700, subp. 4, and was prepared in compliance with the procedures in Minn. R. 7849.1900.

## **IV. ALJ Report**

The ALJ prepared a well-reasoned and thorough report detailing the proceedings, evidence in the record, arguments of parties and public commenters, and an analysis of the certificate of need, siting criteria, and routing criteria as applied to the proposed Wind and Solar Projects.

Based on the findings and conclusions identified in the report, the ALJ recommended that the Commission:

- issue a certificate of need, site permit, and route permit to Big Bend to construct and operate the Wind Project and associated facilities in Cottonwood, Martin and Watonwan Counties, with the conditions identified in the ALJ Report; and
- issue a certificate of need and site permit to Red Rock to construct and operate the Solar Project and associated facilities in Cottonwood County, with the conditions identified in the ALJ Report.

#### **A. Exceptions to the ALJ Report**

The Commission has examined the record and considered the ALJ Report and exceptions. Based on the record, the Commission concurs with the ALJ's findings of fact, conclusions of law, and recommendation. The Commission will adopt the ALJ's Report.

### **V. Legal Standard**

#### **A. Certificate of Need**

Minn. Stat. § 216B.243, subd. 2, provides that no large energy facility shall be sited or constructed in Minnesota without the issuance of a certificate of need by the Commission. The Commission will not issue a certificate of need unless the applicant shows that electricity demand cannot be met more cost effectively through conservation and load-management measures and the applicant has otherwise justified the need for the proposed facility.

In assessing the need for a proposed large energy facility, the Commission must consider the factors listed under each of the criteria set forth in Minn. Stat. § 216B.243, subd. 3, and Minn. R. 7849.0120.

Under Minn. R. 7849.0120, the Commission must issue a certificate of need if it determines:

- A. the probable result of denial would be an adverse effect upon the future adequacy, reliability, or efficiency of energy supply to the applicant, to the applicant's customers, or to the people of Minnesota and neighboring states, considering:
  1. the accuracy of the applicant's forecast of demand for the type of energy that would be supplied by the proposed facility;
  2. the effects of the applicant's existing or expected conservation programs and state and federal conservation programs;
  3. the effects of promotional practices of the applicant that may have given rise to the increase in the energy demand, particularly promotional practices which have occurred since 1974;
  4. the ability of current facilities and planned facilities not requiring certificates of need to meet the future demand; and
  5. the effect of the proposed facility, or a suitable modification thereof, in making efficient use of resources;
- B. a more reasonable and prudent alternative to the proposed facility has not been demonstrated by a preponderance of the evidence on the record, considering:



1. the appropriateness of the size, the type, and the timing of the proposed facility compared to those of reasonable alternatives;
  2. the cost of the proposed facility and the cost of energy to be supplied by the proposed facility compared to the costs of reasonable alternatives and the cost of energy that would be supplied by reasonable alternatives;
  3. the effects of the proposed facility upon the natural and socioeconomic environments compared to the effects of reasonable alternatives; and
  4. the expected reliability of the proposed facility compared to the expected reliability of reasonable alternatives;
- C. by a preponderance of the evidence on the record, the proposed facility, or a suitable modification of the facility, will provide benefits to society in a manner compatible with protecting the natural and socioeconomic environments, including human health, considering:
1. the relationship of the proposed facility, or a suitable modification thereof, to overall state energy needs;
  2. the effects of the proposed facility, or a suitable modification thereof, upon the natural and socioeconomic environments compared to the effects of not building the facility;
  3. the effects of the proposed facility, or a suitable modification thereof, in inducing future development; and
  4. the socially beneficial uses of the output of the proposed facility, or a suitable modification thereof, including its uses to protect or enhance environmental quality; and
- D. the record does not demonstrate that the design, construction, or operation of the proposed facility, or a suitable modification of the facility, will fail to comply with relevant policies, rules, and regulations of other state and federal agencies and local governments.

## **B. Site and Route Permits**

Minn. Stat. § 216E.03, subd. 1, states that no person may construct a large electric generating plant without a site permit from the Commission and that a large electric generating plant may be constructed only on a site approved by the Commission.

Minn. Stat. § 216E.03, subd. 2, states that no person may construct HVTL without a route permit from the Commission. A HVTL may be constructed only along a route approved by the Commission.

In deciding whether to issue a permit for a large electric power generating plant or a HVTL, the Commission's determinations must be guided by the state's goals to conserve resources, minimize environmental impacts, minimize human settlement and other land use conflicts, and

ensure the state's electric energy security through efficient, cost-effective power supply and electric transmission infrastructure.<sup>9</sup>

In deciding whether to issue a permit for a large electric power generating plant or a high-voltage transmission line, the Commission must consider the criteria set out in Minn. R. 7850.4100:

- effects on human settlement, including, but not limited to, displacement, noise, aesthetics, cultural values, recreation, and public services;
- effects on public health and safety;
- effects on land-based economies, including, but not limited to, agriculture, forestry, tourism, and mining;
- effects on archaeological and historic resources;
- effects on the natural environment, including effects on air and water quality resources and flora and fauna;
- effects on rare and unique natural resources;
- application of design options that maximize energy efficiencies, mitigate adverse environmental effects, and could accommodate expansion of transmission or generating capacity;
- use or paralleling of existing rights-of-way, survey lines, natural division lines, and agricultural field boundaries;
- use of existing large electric power generating plant sites;
- use of existing transportation, pipeline, and electrical transmission systems or rights-of-way;
- electrical system reliability;
- costs of constructing, operating, and maintaining the facility which are dependent on design and route;
- adverse human and natural environmental effects which cannot be avoided; and
- irreversible and irretrievable commitments of resources.

The Commission may impose conditions on the grant of a site or route permit.

## **VI. Summary of Public Comments**

Many members of the public, including residents, workers, and business owners in the area, local government representatives, and labor-union representatives, supported the Hybrid Project as a source of jobs, tax revenue, other economic activity, and clean, renewable, low-cost electricity.

Multiple members of the public raised questions about potential impacts related to scenic views, property values, shadow flicker, and noise. There were also multiple comments with concerns about the HVTTL route including the loss of animal habitat and impact on property values.

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<sup>9</sup> Minn. Stat. § 216E.03, subd. 7.

SHPO provided comments stating that no National Register or State Register listed history-architecture properties that would be affected by the Solar Project. SHPO also noted that the revised Wind Project design has mitigated the anticipated visual impacts to the viewshed and setting of Jeffers Petroglyphs.

## **VII. The Applicants' Certificate of Need Applications**

### **A. DOC-DER Analysis and Recommendation**

DOC-DER filled comments on the merits of the certificate of need applications recommending that the Commission consider the impacts detailed in the EA, and, if the impacts are acceptable, grant the certificate of need. Overall, DOC-DER recommended that the Commission determine that the Applicants have shown that:

- the probable result of denial would be an adverse effect upon the future adequacy, reliability, or efficiency of energy supply to the applicant, to the applicant's customers, or to the people of Minnesota and neighboring states;
- a more reasonable and prudent alternative to the proposed facility has not been demonstrated by a preponderance of the evidence in the record; and
- the record does not demonstrate that the design, construction, or operation of the proposed facility, or a suitable modification of the facility, will fail to comply with relevant policies, rules, and regulations of other state and federal agencies and local governments.

#### **1. Future Adequacy, Reliability, or Efficiency of Energy Supply**

DOC-DER stated that Applicants' forecast of the need for the energy expected to be produced by the Hybrid Project is reasonable and fits the state's overall energy needs by meeting the need for new renewable energy. DOC-DER concurred with the Applicants that the integrated resource plans, renewable energy goals, and carbon dioxide emissions reduction goals of Xcel Energy, Minnesota Power, and Otter Tail Power Company, along with the regional trend towards retirement of coal units, the existence of a market for projects being sold directly to commercial and industrial customers, and statutes<sup>10</sup> with a preference for renewable resources in resource planning and acquisition decisions all weigh in favor of new renewable energy.

Considering the subfactors set forth in Minn. R. 7849.0120(A), DOC-DER recommended the Commission find that the Applicants have shown that the probable result of denial of the certificate of need applications would be an adverse effect on the future adequacy, reliability, or efficiency of energy supply to the applicant, its customers, or the people of Minnesota and neighboring states.

#### **2. Reasonable and Prudent Alternatives**

Based on the forecasted need for the energy expected to be produced by the Hybrid Project, DOC-DER stated that the proposed Hybrid Project is reasonable in size, type, and timing. DOC-

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<sup>10</sup> Minnesota Statutes § 216B.243, subd. 3a. Minnesota Statutes § 216B.2422, subd. 4.

DER noted that the Hybrid Project is sized to take advantage of economies of scale while making efficient use of existing transmission capacity.

The primary alternatives to the proposed facilities are purchases from renewable facilities outside Minnesota or construction of renewable Minnesota facilities that are small enough not to require certificates of need (less than 50 MW). A renewable facility of less than 50 MW would not contribute as substantial an amount of renewable energy towards the Minnesota Renewable Energy Standard<sup>11</sup> goals and would not benefit as much from economies of scale as the proposed Hybrid Project.

Accordingly, considering the subfactors set forth in Minn. R. 7849.0120(B), DOC-DER recommended that the Commission determine that a more reasonable and prudent alternative to the proposed Hybrid Project has not been demonstrated by a preponderance of the evidence.

### **3. Environmental and Societal Benefits**

DOC-DER stated that the proposed Hybrid Project would provide emissions-free renewable energy, would have relatively minor pollution impacts, and could help Minnesota meet its energy needs while supporting the state's renewable energy and greenhouse gas emissions-reductions goals.

The Applicants' certificate of need applications included a discussion of alternatives to the proposed Hybrid Project, including, but not limited to hydropower, biomass, and emerging technologies. The Applicants stated that the Hybrid Project will generate electricity as a lower cost per kWh than other possible renewable energy options, such as coal and biomass.

### **4. Compliance with Existing Policies, Rules, and Regulations**

DOC-DER stated that the record does not demonstrate that the design, construction, or operation of the proposed Hybrid Project, or a suitable modification of the facilities, will fail to comply with relevant policies, rules, and regulations of other state and federal agencies and local governments

#### **B. ALJ Recommendation**

The ALJ provided a complete and thorough review and analysis of the Applicants' certificate of need applications and the record. The ALJ agreed with DOC-DER's assessment and concluded that the Applicants satisfied the relevant factors and sub-factors set forth in Minn. R. 7849.0120(A) through (D) necessary to determine that a certificate of need must be granted for the Hybrid Project.

#### **C. Commission Action**

The Commission has evaluated the considerations and criteria of Minn. Stat. § 216B.243 and Minn. R. 7849.0120, considering the entire record, including the EA, comments, and the ALJ Report. For the reasons discussed below, the Commission concludes that the Hybrid Project

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<sup>11</sup> Minn. Stat. § 216B.1691.

meets the applicable criteria and that Applicants have justified the need for the Hybrid Project. Therefore, the Commission will grant certificates of need for the Wind and Solar Projects.

### **1. Future Adequacy, Reliability, or Efficiency of Energy Supply**

The Commission finds that the probable result of denial of a certificate of need for the Hybrid Project would be an adverse effect upon the future adequacy, reliability, or efficiency of energy supply to the people of Minnesota and neighboring states, satisfying Minn. R. 7849.0120(A). The Commission agrees with the ALJ's findings that denying the Applicants' certificate of need applications would result in the loss of a significant amount of electricity needed to satisfy state and regional demand and would deny utilities and other customers the opportunity to purchase clean, low-cost energy that will count toward satisfying renewable energy standards and goals. It has not been demonstrated that the forecasted demand could be met in a more reasonable or cost-effective manner by any combination of existing facilities or planned facilities not requiring certificates of need.

### **2. Reasonable and Prudent Alternatives**

The Commission finds that a more reasonable and prudent alternative to the Hybrid Project has not been demonstrated by a preponderance of the evidence on the record.

The Commission agrees with the ALJ's findings that the proposed Hybrid Project is appropriate in size, type, and timing, is cost-effective compared to alternatives, and will have relatively minor impacts on the natural and socioeconomic environments. A more reasonable and prudent alternative to the Hybrid Project has not been identified.

### **3. Environmental and Societal Benefits**

By a preponderance of the evidence in the record, the Commission finds that the Hybrid Project will provide benefits to society in a manner compatible with protecting the natural and socioeconomic environments, including human health, satisfying Minn. R. 7849.0120(C).

The record demonstrates that energy produced by the Hybrid Project will provide significant benefits including providing renewable energy with minimal environmental impact and enhancement of regional and national energy security and reliability.

### **4. Compliance with Existing Policies, Rules, and Regulations**

The Commission agrees with the ALJ's analysis and finds that the record does not demonstrate that the design, construction, or operation of the Hybrid Project will fail to comply with relevant policies, rules, and regulations of other state and federal agencies and local governments, satisfying Minn. R. 7849.0120(D).

## **VIII. Big Bend Site Permit**

The Draft Site Permit includes proposed permit conditions that apply to site preparation, construction, clean-up, restoration, operation, maintenance, abandonment, decommissioning, and other aspects of the Wind Project.

## **A. Settlement**

On September 14, 2021, the Applicants and the Intervening Parties entered into a settlement agreement regarding the proximity and visibility of the Wind Project to the Jeffers Petroglyphs and the Red Rock Ridge (the Settlement Agreement). No amendments were made to the certificate of need applications, Wind Project route permit, or Solar Project site permit as a result of the Settlement Agreement.

Big Bend revised the proposed wind turbine layout by removing the turbines located in the zone between 5 and 6.5 miles from the Jeffers Petroglyphs and replacing some of the lost generation by siting 5 new alternative locations that are farther than 7 miles from viewpoints at the Jeffers Petroglyphs. Big Bend created a variant to the revised layout that would also remove two turbines located in the zone between 6.5 and 7 miles of the Jeffers Petroglyphs if the Commission approves Big Bend's proposed alternative locations.

As part of the Settlement Agreement, Big Bend requested that the Commission waive the wind access buffer setback for four alternative turbine locations (Turbines A01, A02, A03, and A04). Big Bend subsequently obtained additional land rights, through good neighbor agreements, related to Turbines A03 and A04 and withdrew its requested waiver for those turbine locations.

Big Bend explained that its attempts to obtain good neighbor agreements related to Turbines A01 and A02 are ongoing and continues to request a waiver of the wind access buffer setback for these locations. Big Bend provided an analysis of each turbine and explained that due to siting restrictions not related to the Project, turbines could not be sited at these locations without a waiver.

### **1. ALJ Report**

The ALJ concluded that record supports issuing a Site Permit for the Wind Project that is consistent with and incorporates the terms and conditions contained in the Settlement Agreement.

### **2. Commission Action**

As detailed in the ALJ Report, the proposed site permit contains reasonable conditions that will mitigate potential impacts and address concerns raised by parties, agencies, and members of the public in the course of these proceedings.

Big Bend has mitigated long-term visual impacts on the Jeffers Site through reducing the number of turbines from 64 to 52, increasing the buffer between Wind Project turbines and the Jeffers Site from approximately 2.4 miles to at least 6.5 miles, and proposing the use of Aircraft Detection Lighting Systems to reduce visual impacts on the night sky. In addition, in response to comments received through early coordination, Big Bend has eliminated potential shadow flicker, noise, and vibration impacts to the Jeffers Site.

Based on a careful consideration of the record and the site-permit criteria of Minn. R. 7854.1000 and Minn. Stat. § 216E.03, the Commission concludes that all procedural requirements have been met and that the Wind Project, subject to the permit conditions contained in the Amended Draft Site Permit and proposed in DOC-EERA's comments, is compatible with environmental

preservation, sustainable development, and the efficient use of resources. Accordingly, the Commission will issue the site permit attached to this order.

The Commission will include several items in the site permit, in addition to the Draft Site Permit language. The Commission will modify the nameplate language recognizing that the combined Hybrid Project facility is at 335 MW when coordinated with the Solar facility clearly delineating the wind facility capacity and turbine number in this coordinated scenario.

The Commission finds that under the unique circumstances of this case and the Settlement Agreement, the record supports a waiver of the wind access buffer setback for Turbines A01 and A02. The Commission will authorize a variance of the wind access buffer setback on the condition that Big Bend extend a final offer to enter into good faith neighbor agreements with the landowners concerning Turbines A01 and A02.

The Commission will also require the Applicants to provide quarterly updates to the Commission, and to the effected counties, townships, and tribal nations, including the following information:

- proposed modifications to the turbine layout along with a detailed map of land control, roads, substations, power lines, receptors and other prominent landmarks (numbering of receptor should be consistent with that used in the application process);
- update on Shadow Flicker Agreements;
- update on turbine selection and related land acquisition;
- update on interconnection status;
- update on any power purchase agreements; and
- any estimates on proposed construction schedules.

## **B. Route Permit**

In the route permit application, Big Bend included its Proposed Route, three alternate segments to the Proposed Route (the alternate Red, Yellow, and Purple Segments), and two Alternative Routes. The Proposed Route runs along the Watonwan River.

Big Bend explained that the Proposed Route represents an effort to identify a route that follows existing roads and parcel lines, avoids residences, minimizes impacts on the environment and affected landowners. Big Bend stated that it has the land rights necessary to construct and operate the HVTL on the Proposed Route.

### **1. Comments**

MN DNR stated that all alternate segments to the Proposed Route are acceptable with appropriate mitigation. MN DNR expressed support for the Purple Segment because it is furthest from the Watonwan River. A portion of Proposed Route would be buried near the Watonwan River due to an existing landing strip located on the east side of County Road 128, north of the Watonwan River and south of the farmstead driveway, which MN DNR indicated would eliminate some bird collisions.

At the Commission meeting, DOC-EERA supported allowing the Applicants flexibility to use the Purple Segment.

## **2. ALJ Recommendation**

Regarding the route permit, the ALJ concluded that Big Bend had satisfied all the criteria set forth in Minn. Stat. Ch. 216E and Minn. R. Ch. 7850. Based on consideration of all routing factors set forth in Minn. Stat. § 216E.03, subd. 7, and Minn. R. 7850.4100, the ALJ concluded that Big Bend's Proposed Route was the best route for the Hybrid Project and recommended that the Commission issue a permit for Proposed Route with no additional conditions.

## **3. Commission Action**

The Commission will issue the attached route permit for the Wind Project that identifies the Big Bend's Proposed Route for its 161 kV transmission line that includes specific requirements and conditions. The Commission will also allow the Applicants to use the Purple Segment as an alternative. At the Commission meeting, the Applicants explained that it did not have any land rights on the alternate Purple Segment. The option to use the Purple Segment provides the Applicants with flexibility to negotiate with landowners and coordinate with MN DNR to mitigate potential impacts of the Proposed Route.

## **IX. Red Rock Site Permit**

The Sample Site Permit includes proposed permit conditions that apply to preparation, construction, clean-up, restoration, operation, maintenance, abandonment, decommission, and other aspects of the Solar Project.

### **1. Comments**

MN DNR provided comments specific to the Red Rock Solar Vegetation Management Plan (VMP) and recommended revising the VMP based on *Guidance for Developing a Vegetation Establishment and Management Plan for Solar Facilities*.<sup>12</sup> MN DNR also recommended that the Applicants use a diverse native prairie species seed mix as indicated in Minn. Stat. § 216B.1642, subd. 1.

MN DNR also recommended that the VMP be updated to include certain additional maps.

The Applicants explained that it has already prepared and provided a comprehensive VMP for the Solar Project, and that the VMP and the site permit application explain the benefits of the seed mixes proposed for the Solar Project. The Applicants stated that MN DNR did not identify any deficiencies in the existing VMP or the seed mixes proposed for the Solar Project.

### **2. ALJ Report**

The ALJ concluded that the procedural requirements for obtaining a site permit have been met and that the Sample Site Permit contains important mitigation measures and other reasonable conditions on which the site permit should be conditioned. Specifically, the ALJ stated that it is

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<sup>12</sup> This guidance document was developed by the Department of Commerce in collaboration with the Board of Soil and Water Resources, the Minnesota Department of Agriculture, and the MN DNR.



reasonable to amend the Sample Solar Site Permit, as proposed by Red Rock and as set forth in Schedule G to the Surrebuttal Testimony of Dylan Ikkala.

The ALJ concluded that the proposed Solar Project satisfies the site-permit criteria under Minn. Stat. § 216E.03, meets all other applicable legal requirements, and does not present a potential for significant adverse environmental effects.

### **3. Commission Action**

Based on a careful consideration of the record and the site-permit criteria of Minn. R. 7854.1000 and Minn. Stat. § 216E.03, the Commission concludes that all procedural requirements have been met and that the Solar Project, subject to the permit conditions recommended in the ALJ Report, is compatible with environmental preservation, sustainable development, and the efficient use of resources. Accordingly, the Commission will issue the site permit attached to this order.

The Commission will include several items in the site permit, in addition to the Draft Site Permit language. The Commission will modify Permit Sections 2, 2.1, and 5.3 as stated on pages 14, 16, and 17 of the staff briefing papers. The Commission will modify project descriptions on the cover page and Permit Sections 1 and 2 to clarify that the solar facility will be at least 50 MW, based on the Commission's Order Accepting Applications,<sup>13</sup> and recognizing that energy generation at the Big Bend Wind Project will be adjusted to not exceed a total of up to 335 MW for the Hybrid Project. The Commission will modify Permit Section 4.3.15 to reflect the most recent version of the guidance document to develop a VMP.

The Commission will also require the Applicants to provide quarterly updates to the Commission, and to the effected counties, townships, and tribal nations, including the following information:

- update on Red Rock Solar and solar equipment procurement;
- update on interconnection status;
- update on any power purchase agreements; and
- any estimates on proposed construction schedules.

### **ORDER**

1. The Commission approves and adopts the Administrative Law Judge's Findings of Fact, Conclusions of Law, and Recommendation.
2. The Commission finds that the Environmental Assessment and the record created in this matter address the issues identified in the Scoping Decision.
3. The Commission grants a certificate of need for the up to 300 MW Big Bend Wind Project proposed in Cottonwood, Watonwan, and Martin Counties, Minnesota.
4. The Commission issues the attached Site Permit for the Big Bend Wind Project incorporating the permit conditions adopted in the ALJ Report with the correction to

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<sup>13</sup> Order Accepting Applications, at Ordering Para. 6.

Section 6.2 and the additional permit condition in Section 6.3 as proposed by DOC-EERA with the following modifications:

- a. the nameplate language recognizing that the combined facility is at 335 MW when coordinated with the Red Rock Solar facility clearly delineating the wind facility capacity and turbine number in this coordinated scenario; and
- b. a variance of the wind access buffer setback for turbine locations A01 and A02 with the following condition:
  - i. Amend LWECS Site Permit section 4.1 Wind Access Buffer language to read:

The Commission authorizes a variance of the wind access buffer setback for the following turbine locations: A-01 and A-02. These variances are granted on the condition that the permittee shall extend a final offer to the remaining landowners for the same amount and terms agreed to by other landowners in similar circumstances or their last offer, whichever is higher. At least 14 days before the preconstruction meeting, the permittee must make a compliance filing describing in detail the results of the negotiation. If no wind rights agreement is reached, Permittee acknowledges that the affected landowners will not be foreclosed from installing wind turbine generators on their property at a later date, even if such turbine generators cannot be installed on their property in compliance with the setbacks set forth in Section 4.1 of Site Permit.

- c. Until the filing for a preconstruction meeting under the LWECS Site permit condition 10.1, the permittee shall file updates with the Commission quarterly commencing within 30 days of the order containing the following information:
  - i. proposed modifications to the turbine layout along with a detailed map of land control, roads, substations, power lines, receptors and other prominent landmarks (numbering of receptor should be consistent with that used in the application process);
  - ii. update on Shadow Flicker Agreements;
  - iii. update on turbine selection and related land acquisition;
  - iv. update on interconnection status;
  - v. update on any power purchase agreements; and
  - vi. any estimates on proposed construction schedules.

The applicant shall also provide the updated compliance filings directly to the effected counties, townships, and tribal nations.

- 5. The Commission issues the attached Route Permit for the Big Bend Wind Project that identifies the route proposed by Big Bend Wind for its 161 kV transmission line that includes specific requirements and conditions, along with the option to use the purple route as an alternative.

6. The Commission issues the attached Site Permit for the up to 60-megawatt Red Rock Solar Project proposed in Cottonwood County, Minnesota with the following modifications:
- a. the proposed changes to sections 2, 2.1, and 5.3 as proposed by staff in the briefing papers; and
  - b. page 1, as modified below:

The Permittee is authorized by this site permit to construct and operate an at least 50-megawatt and up to 60-megawatt alternating current nameplate capacity solar energy conversion system and associated facilities.

- c. Site Permit section 1, as modified below:

This permit authorizes the Permittee to construct and operate an at least 50-megawatt and up to 60-megawatt alternating current nameplate capacity solar energy conversion system and associated facilities in Midway Township, Cottonwood County, Minnesota, and as identified in the attached site maps, hereby incorporated into this document.

- d. Site permit section 2, as modified below:

The Project is an at least 50-megawatt and up to 60-megawatt (MW) alternating current (AC) nameplate capacity solar energy conversion system and associated facilities in Midway Township, Cottonwood County, Minnesota.

- e. The nameplate language recognizing that the solar facility must be constructed at 50 MW or greater otherwise it is subject to local permitting and recognizing that the combined facility at 335 MW when coordinated with the Big Bend LWECS facility clearly delineating the wind facility capacity and turbine number in this coordinated scenario; and
- f. Until the filing for a preconstruction meeting under the Red Rock Solar site permit condition 8.1, the permittee shall file updates with the Commission quarterly commencing within 30 days of the order containing the following information:
  - i. update on Red Rock Solar and solar equipment procurement;
  - ii. update on interconnection status;
  - iii. update on any power purchase agreements; and
  - iv. any estimates on proposed construction schedules.

The applicant shall also provide the updated compliance filings directly to the effected counties, townships, and tribal nations.

- g. Site permit section 4.3.15, as modified below:

The Permittee shall implement site restoration and management practices that provide for native perennial vegetation and foraging habitat beneficial to gamebirds, songbirds, and pollinators; and that enhances soil water retention and reduces storm water runoff and erosion. The Permittee shall develop a vegetation management plan that incorporates, to the extent applicable and appropriate, the technical guidance and best management practices outlined in the ~~DNR's Prairie~~

~~Establishment and Maintenance Technical Guidance for Solar Projects~~ *Guidance for Developing a Vegetation Establishment and Management Plan for Solar Facilities*.<sup>14</sup> The vegetation management plan shall be filed at least 30 days prior to the pre-construction meeting.

To ensure continued management and recognition of beneficial habitat, the Permittee is encouraged to seek certification of the project by following guidance set forth by the Pollinator Plan provided by the Board of Water and Soil Resources. All documents required by Board of Water and Soil Resources for Habitat Friendly Solar Certification and maintenance of that certification should also be filed with the Commission.

7. This order shall become effective immediately.

BY ORDER OF THE COMMISSION



Will Seuffert  
Executive Secretary



This document can be made available in alternative formats (e.g., large print or audio) by calling 651.296.0406 (voice). Persons with hearing or speech impairment may call using their preferred Telecommunications Relay Service or email [consumer.puc@state.mn.us](mailto:consumer.puc@state.mn.us) for assistance.

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<sup>14</sup> [https://files.dnr.state.mn.us/publications/ewr/prairie\\_solar\\_tech\\_guidance.pdf](https://files.dnr.state.mn.us/publications/ewr/prairie_solar_tech_guidance.pdf). *Guidance for Developing a Vegetation Establishment and Management Plan for Solar Facilities*, March 2021. <https://apps.commerce.state.mn.us/eera/web/project-file/11702>.

## **CERTIFICATE OF SERVICE**

I, Chrishna Beard, hereby certify that I have this day, served a true and correct copy of the following document to all persons at the addresses indicated below or on the attached list by electronic filing, electronic mail, courier, interoffice mail or by depositing the same enveloped with postage paid in the United States mail at St. Paul, Minnesota.

### **Minnesota Public Utilities Commission ORDER ISSUING PERMITS**

Docket Number **IP-7013/CN-19-408, IP-7013/WS-19-619, IP-7013/TL-19-621, IP-7014/CN-19-486, IP-7014/GS-19-620**

Dated this 28th day of September, 2022

/s/ Chrishna Beard

| First Name     | Last Name          | Email                                | Company Name  | Address   | Delivery Method    | View Trade Secret | Service List Name    |
|----------------|--------------------|--------------------------------------|---|---|--------------------|-------------------|----------------------|
| Sarah          | Beimers            | sarah.beimers@state.mn.us            | Department of Administration - State Historic Preservation Office | 50 Sherburne Avenue<br>Suite 203<br>St. Paul,<br>MN<br>55155  | Electronic Service | No                | OFF_SL_19-408_19-408 |
| Christina      | Brusven            | cbrusven@fredlaw.com                 | Fredrikson Byron  | 200 S 6th St Ste 4000<br><br>Minneapolis,<br>MN<br>554021425  | Electronic Service | Yes               | OFF_SL_19-408_19-408 |
| Generic Notice | Commerce Attorneys | commerce.attorneys@ag.state.mn.us    | Office of the Attorney General-DOC                                | 445 Minnesota Street Suite 1400<br><br>St. Paul,<br>MN<br>55101   | Electronic Service | Yes               | OFF_SL_19-408_19-408 |
| Richard        | Dornfeld           | Richard.Dornfeld@ag.state.mn.us      | Office of the Attorney General-DOC                                | Minnesota Attorney General's Office<br>445 Minnesota Street,<br>Suite 1800<br>Saint Paul,<br>Minnesota<br>55101 | Electronic Service | No                | OFF_SL_19-408_19-408 |
| Adam           | Duininck           | aduininck@ncsrcc.org                 | North Central States Regional Council of Carpenters               | 700 Olive Street<br><br>St. Paul,<br>MN<br>55130  | Electronic Service | No                | OFF_SL_19-408_19-408 |
| Kate           | Fairman            | kate.frantz@state.mn.us              | Department of Natural Resources                                   | Box 32<br>500 Lafayette Rd<br>St. Paul,<br>MN<br>551554032  | Electronic Service | No                | OFF_SL_19-408_19-408 |
| Annie          | Felix Gerth        | annie.felix-gerth@state.mn.us        |   | Board of Water & Soil Resources<br>520 Lafayette Rd<br>Saint Paul,<br>MN<br>55155                               | Electronic Service | No                | OFF_SL_19-408_19-408 |
| Sharon         | Ferguson           | sharon.ferguson@state.mn.us          | Department of Commerce  | 85 7th Place E Ste 280<br><br>Saint Paul,<br>MN<br>551012198  | Electronic Service | No                | OFF_SL_19-408_19-408 |
| Lucas          | Franco             | lfranco@liunagroc.com                | LIUNA   | 81 Little Canada Rd E<br><br>Little Canada,<br>MN<br>55117  | Electronic Service | No                | OFF_SL_19-408_19-408 |
| Brenna         | Gunderson          | Brenna.gunderson@apexcleanenergy.com | Apex Clean Eenergy  | 8665 Hudson Blvd N Ste 110<br><br>Lake Elmo,<br>MN<br>55042   | Electronic Service | Yes               | OFF_SL_19-408_19-408 |

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| Kate M     | Heins     | kate.heins@apexcleanenergy.com        | Apex Clean Energy                       | 310 4th St NE Ste 200<br><br>Charlottesville,<br>VA<br>22902                  | Electronic Service | Yes               | OFF_SL_19-408_19-408 |
| Kari       | Howe      | kari.howe@state.mn.us                 | DEED                                    | 332 Minnesota St, #E200<br>1ST National Bank Bldg<br>St. Paul,<br>MN<br>55101 | Electronic Service | No                | OFF_SL_19-408_19-408 |
| Dylan      | Ikkala    | dylan.ikkala@apexcleanenergy.com      | Apex Clean Energy                       | 8665 Hudson Blvd N Ste 110<br><br>Lake Elmo,<br>MN<br>55042                   | Electronic Service | Yes               | OFF_SL_19-408_19-408 |
| Ray        | Kirsch    | Raymond.Kirsch@state.mn.us            | Department of Commerce                  | 85 7th Place E Ste 500<br><br>St. Paul,<br>MN<br>55101                        | Electronic Service | No                | OFF_SL_19-408_19-408 |
| Karen      | Kromar    | karen.kromar@state.mn.us              | MN Pollution Control Agency             | 520 Lafayette Rd<br><br>Saint Paul,<br>MN<br>55155                            | Electronic Service | No                | OFF_SL_19-408_19-408 |
| Chris      | Kunkle    | chris.kunkle@apexcleanenergy.com      | Apex Clean Energy                       | 8665 Hudson Blvd North, Suite 110<br><br>Lake Elmo,<br>MN<br>55042            | Electronic Service | No                | OFF_SL_19-408_19-408 |
| James      | LaFave    | james.lafave@state.mn.us              | Office of Administrative Hearings       | 600 N Robert Street<br><br>St. Paul,<br>MN<br>55164-0620                      | Electronic Service | No                | OFF_SL_19-408_19-408 |
| Kevin      | Majjala   | Kevin.Majjala@mnhs.org                | Minnesota Historical Society            | N/A   | Electronic Service | No                | OFF_SL_19-408_19-408 |
| Samantha J | Odegard   | samanthao@uppergiouxcommunity-nsn.gov | Upper Sioux Tribal Community            | PO Box 147<br><br>Granite Falls,<br>MN<br>56241                               | Electronic Service | No                | OFF_SL_19-408_19-408 |
| Kevin      | Pranis    | kpranis@liunagroc.com                 | Laborers' District Council of MN and ND | 81 E Little Canada Road<br><br>St. Paul,<br>Minnesota<br>55117                | Electronic Service | No                | OFF_SL_19-408_19-408 |
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| Leif           | Rasmussen                      | leif@steffensandrasmu<br>senn.com        | Steffens & Rasmussen                  | 6600 France Ave South<br><br>Edina,<br>MN<br>55435                          | Electronic Service | No                | OFF_SL_19-408_19-408 |
| Generic Notice | Residential Utilities Division | residential.utilities@ag.stat<br>e.mn.us | Office of the Attorney<br>General-RUD | 1400 BRM Tower<br>445 Minnesota St<br>St. Paul,<br>MN<br>551012131          | Electronic Service | Yes               | OFF_SL_19-408_19-408 |
| Stephan        | Roos                           | stephan.roos@state.mn.us                 | MN Department of<br>Agriculture       | 625 Robert St N<br><br>Saint Paul,<br>MN<br>55155-2538                      | Electronic Service | No                | OFF_SL_19-408_19-408 |
| Nathaniel      | Runke                          | nrunke@local49.org                       |                                       | 611 28th St. NW<br><br>Rochester,<br>MN<br>55901                            | Electronic Service | No                | OFF_SL_19-408_19-408 |
| Ronald C       | Schirmer                       | ronald.schirmer@mnsu.edu                 | Department of<br>Anthropology         | 359 Trafton Science Center<br>N<br><br>Mankato,<br>MN<br>56001              | Electronic Service | No                | OFF_SL_19-408_19-408 |
| Will           | Seuffert                       | Will.Seuffert@state.mn.us                | Public Utilities Commission           | 121 7th Pl E Ste 350<br><br>Saint Paul,<br>MN<br>55101                      | Electronic Service | Yes               | OFF_SL_19-408_19-408 |
| Janet          | Shaddix Elling                 | jshaddix@janetshaddix.co<br>m            | Shaddix And Associates                | 7400 Lyndale Ave S Ste<br>190<br><br>Richfield,<br>MN<br>55423              | Electronic Service | Yes               | OFF_SL_19-408_19-408 |
| Cheyenne       | St. John                       | cheyenne.stjohn@lowersio<br>ux.com       | Lower Sioux Tribal<br>Community       | 39527 Reservation Hwy 1<br><br>Morton,<br>MN<br>56270                       | Electronic Service | No                | OFF_SL_19-408_19-408 |
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| Haley      | Waller Pitts | hwallerpitts@fredlaw.com     | Fredrikson & Byron, P.A.                  | 200 S 6th St Ste 4000<br>Minneapolis,<br>MN<br>55402                 | Electronic Service | Yes               | OFF_SL_19-408_19-408 |
| Cynthia    | Warzecha     | cynthia.warzecha@state.mn.us | Minnesota Department of Natural Resources | 500 Lafayette Road<br>Box 25<br>St. Paul,<br>Minnesota<br>55155-4040 | Electronic Service | No                | OFF_SL_19-408_19-408 |

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| Sarah          | Beimers            | sarah.beimers@state.mn.us            | Department of Administration - State Historic Preservation Office | 50 Sherburne Avenue<br>Suite 203<br>St. Paul,<br>MN<br>55155  | Electronic Service | No                | OFF_SL_19-619_19-619 |
| Christina      | Brusven            | cbrusven@fredlaw.com                 | Fredrikson Byron  | 200 S 6th St Ste 4000<br><br>Minneapolis,<br>MN<br>554021425  | Electronic Service | Yes               | OFF_SL_19-619_19-619 |
| Generic Notice | Commerce Attorneys | commerce.attorneys@ag.state.mn.us    | Office of the Attorney General-DOC                                | 445 Minnesota Street Suite 1400<br><br>St. Paul,<br>MN<br>55101   | Electronic Service | Yes               | OFF_SL_19-619_19-619 |
| Richard        | Dornfeld           | Richard.Dornfeld@ag.state.mn.us      | Office of the Attorney General-DOC                                | Minnesota Attorney General's Office<br>445 Minnesota Street,<br>Suite 1800<br>Saint Paul,<br>Minnesota<br>55101 | Electronic Service | No                | OFF_SL_19-619_19-619 |
| Adam           | Duininck           | aduininck@ncsrcc.org                 | North Central States Regional Council of Carpenters               | 700 Olive Street<br><br>St. Paul,<br>MN<br>55130  | Electronic Service | No                | OFF_SL_19-619_19-619 |
| Sharon         | Ferguson           | sharon.ferguson@state.mn.us          | Department of Commerce  | 85 7th Place E Ste 280<br><br>Saint Paul,<br>MN<br>551012198  | Electronic Service | No                | OFF_SL_19-619_19-619 |
| Lucas          | Franco             | lfranco@liunagroc.com                | LIUNA   | 81 Little Canada Rd E<br><br>Little Canada,<br>MN<br>55117  | Electronic Service | No                | OFF_SL_19-619_19-619 |
| Brenna         | Gunderson          | Brenna.gunderson@apexcleanenergy.com | Apex Clean Eenergy  | 8665 Hudson Blvd N Ste 110<br><br>Lake Elmo,<br>MN<br>55042   | Electronic Service | Yes               | OFF_SL_19-619_19-619 |
| Kate M         | Heins              | kate.heins@apexcleanenergy.com       | Apex Clean Energy   | 310 4th St NE Ste 200<br><br>Charlottesville,<br>VA<br>22902  | Electronic Service | Yes               | OFF_SL_19-619_19-619 |
| Valerie        | Herring            | vherring@taftlaw.com                 | Taft Stettinius & Hollister LLP                                   | 2200 IDS Center<br>80 S. Eighth Street<br>Minneapolis,<br>MN<br>55402   | Electronic Service | No                | OFF_SL_19-619_19-619 |

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| Dylan          | Ikkala                         | dylan.ikkala@apexcleanenergy.com      | Apex Clean Energy                            | 8665 Hudson Blvd N Ste 110<br><br>Lake Elmo,<br>MN<br>55042                     | Electronic Service | Yes               | OFF_SL_19-619_19-619 |
| David          | Kelliher                       | david.kelliher@mnhs.org               |  | 345 Kellogg Blvd W<br><br>SAINT PAUL,<br>MN<br>55102                            | Electronic Service | No                | OFF_SL_19-619_19-619 |
| Stacy          | Kotch Egstad                   | Stacy.Kotch@state.mn.us               | MINNESOTA<br>DEPARTMENT OF<br>TRANSPORTATION | 395 John Ireland Blvd.<br><br>St. Paul,<br>MN<br>55155                          | Electronic Service | No                | OFF_SL_19-619_19-619 |
| James          | LaFave                         | james.lafave@state.mn.us              | Office of Administrative<br>Hearings         | 600 N Robert Street<br><br>St. Paul,<br>MN<br>55164-0620                        | Electronic Service | No                | OFF_SL_19-619_19-619 |
| Kevin          | Maijala                        | Kevin.Maijala@mnhs.org                | Minnesota Historical<br>Society              | N/A   | Electronic Service | No                | OFF_SL_19-619_19-619 |
| Samantha J     | Odegard                        | samanthao@uppersiouxcommunity-nsn.gov | Upper Sioux Tribal<br>Community              | PO Box 147<br><br>Granite Falls,<br>MN<br>56241                                 | Electronic Service | No                | OFF_SL_19-619_19-619 |
| Kevin          | Pranis                         | kpranis@liunagroc.com                 | Laborers' District Council of<br>MN and ND   | 81 E Little Canada Road<br><br>St. Paul,<br>Minnesota<br>55117                  | Electronic Service | No                | OFF_SL_19-619_19-619 |
| Peter          | Rademacher                     | prademacher@hogenadams.com            |  | 1935 County Road B2<br>West<br><br>Suite 460<br>St. Paul,<br>Minnesota<br>55113 | Electronic Service | No                | OFF_SL_19-619_19-619 |
| Leif           | Rasmussen                      | leif@steffensandrasmusse<br>n.com     | Steffens & Rasmussen                         | 6600 France Ave South<br><br>Edina,<br>MN<br>55435                              | Electronic Service | No                | OFF_SL_19-619_19-619 |
| Generic Notice | Residential Utilities Division | residential.utilities@ag.state.mn.us  | Office of the Attorney<br>General-RUD        | 1400 BRM Tower<br>445 Minnesota St<br>St. Paul,<br>MN<br>551012131              | Electronic Service | Yes               | OFF_SL_19-619_19-619 |
|                |                                |                                       |  |   |                    |                   |                      |

| First Name | Last Name      | Email                              | Company Name                                 | Address  | Delivery Method    | View Trade Secret | Service List Name    |
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| Nathaniel  | Runke          | nrunke@local49.org                 |  | 611 28th St. NW<br>Rochester,<br>MN<br>55901                         | Electronic Service | No                | OFF_SL_19-619_19-619 |
| Ronald C   | Schirmer       | ronald.schirmer@mnsu.edu           | Department of<br>Anthropology                | 359 Trafton Science Center<br>N<br>Mankato,<br>MN<br>56001           | Electronic Service | No                | OFF_SL_19-619_19-619 |
| Will       | Seuffert       | Will.Seuffert@state.mn.us          | Public Utilities Commission                  | 121 7th Pl E Ste 350<br>Saint Paul,<br>MN<br>55101                   | Electronic Service | Yes               | OFF_SL_19-619_19-619 |
| Janet      | Shaddix Elling | jshaddix@janetshaddix.com          | Shaddix And Associates                       | 7400 Lyndale Ave S Ste<br>190<br>Richfield,<br>MN<br>55423           | Electronic Service | Yes               | OFF_SL_19-619_19-619 |
| Cheyenne   | St. John       | cheyenne.stjohn@lowersio<br>ux.com | Lower Sioux Tribal<br>Community              | 39527 Reservation Hwy 1<br>Morton,<br>MN<br>56270                    | Electronic Service | No                | OFF_SL_19-619_19-619 |
| Haley      | Waller Pitts   | hwallerpitts@fredlaw.com           | Fredrikson & Byron, P.A.                     | 200 S 6th St Ste 4000<br>Minneapolis,<br>MN<br>55402                 | Electronic Service | Yes               | OFF_SL_19-619_19-619 |
| Cynthia    | Warzecha       | cynthia.warzecha@state.m<br>n.us   | Minnesota Department of<br>Natural Resources | 500 Lafayette Road<br>Box 25<br>St. Paul,<br>Minnesota<br>55155-4040 | Electronic Service | No                | OFF_SL_19-619_19-619 |

| First Name     | Last Name          | Email                                | Company Name  | Address   | Delivery Method    | View Trade Secret | Service List Name    |
|----------------|--------------------|--------------------------------------|---|---|--------------------|-------------------|----------------------|
| Sarah          | Beimers            | sarah.beimers@state.mn.us            | Department of Administration - State Historic Preservation Office | 50 Sherburne Avenue<br>Suite 203<br>St. Paul,<br>MN<br>55155  | Electronic Service | No                | OFF_SL_19-621_19-621 |
| Christina      | Brusven            | cbrusven@fredlaw.com                 | Fredrikson Byron  | 200 S 6th St Ste 4000<br><br>Minneapolis,<br>MN<br>554021425  | Electronic Service | Yes               | OFF_SL_19-621_19-621 |
| Generic Notice | Commerce Attorneys | commerce.attorneys@ag.state.mn.us    | Office of the Attorney General-DOC                                | 445 Minnesota Street Suite 1400<br><br>St. Paul,<br>MN<br>55101   | Electronic Service | Yes               | OFF_SL_19-621_19-621 |
| Richard        | Dornfeld           | Richard.Dornfeld@ag.state.mn.us      | Office of the Attorney General-DOC                                | Minnesota Attorney General's Office<br>445 Minnesota Street,<br>Suite 1800<br>Saint Paul,<br>Minnesota<br>55101 | Electronic Service | No                | OFF_SL_19-621_19-621 |
| Sharon         | Ferguson           | sharon.ferguson@state.mn.us          | Department of Commerce  | 85 7th Place E Ste 280<br><br>Saint Paul,<br>MN<br>551012198  | Electronic Service | No                | OFF_SL_19-621_19-621 |
| Lucas          | Franco             | lfranco@liunagroc.com                | LIUNA   | 81 Little Canada Rd E<br><br>Little Canada,<br>MN<br>55117  | Electronic Service | No                | OFF_SL_19-621_19-621 |
| Brenna         | Gunderson          | Brenna.gunderson@apexcleanenergy.com | Apex Clean Eenergy  | 8665 Hudson Blvd N Ste 110<br><br>Lake Elmo,<br>MN<br>55042   | Electronic Service | No                | OFF_SL_19-621_19-621 |
| Kate M         | Heins              | kate.heins@apexcleanenergy.com       | Apex Clean Energy   | 310 4th St NE Ste 200<br><br>Charlottesville,<br>VA<br>22902  | Electronic Service | No                | OFF_SL_19-621_19-621 |
| Stacy          | Kotch Egstad       | Stacy.Kotch@state.mn.us              | MINNESOTA DEPARTMENT OF TRANSPORTATION                            | 395 John Ireland Blvd.<br><br>St. Paul,<br>MN<br>55155  | Electronic Service | No                | OFF_SL_19-621_19-621 |
| Chris          | Kunkle             | chris.kunkle@apexcleanenergy.com     | Apex Clean Energy   | 8665 Hudson Blvd North, Suite 110<br><br>Lake Elmo,<br>MN<br>55042  | Electronic Service | No                | OFF_SL_19-621_19-621 |

| First Name     | Last Name                      | Email                                 | Company Name                            | Address  | Delivery Method    | View Trade Secret | Service List Name    |
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| James          | LaFave                         | james.lafave@state.mn.us              | Office of Administrative Hearings       | 600 N Robert Street<br><br>St. Paul,<br>MN<br>55164-0620                     | Electronic Service | No                | OFF_SL_19-621_19-621 |
| Kevin          | Majjala                        | Kevin.Majjala@mnhs.org                | Minnesota Historical Society            | N/A  | Electronic Service | No                | OFF_SL_19-621_19-621 |
| Samantha J     | Odegard                        | samanthao@uppersiouxcommunity-nsn.gov | Upper Sioux Tribal Community            | PO Box 147<br><br>Granite Falls,<br>MN<br>56241                              | Electronic Service | No                | OFF_SL_19-621_19-621 |
| Kevin          | Pranis                         | kpranis@liunagroc.com                 | Laborers' District Council of MN and ND | 81 E Little Canada Road<br><br>St. Paul,<br>Minnesota<br>55117               | Electronic Service | No                | OFF_SL_19-621_19-621 |
| Peter          | Rademacher                     | prademacher@hogenadams.com            |   | 1935 County Road B2 West<br><br>Suite 460<br>St. Paul,<br>Minnesota<br>55113 | Electronic Service | No                | OFF_SL_19-621_19-621 |
| Leif           | Rasmussen                      | leif@steffensandrasmusse n.com        | Steffens & Rasmussen                    | 6600 France Ave South<br><br>Edina,<br>MN<br>55435                           | Electronic Service | No                | OFF_SL_19-621_19-621 |
| Generic Notice | Residential Utilities Division | residential.utilities@ag.state.mn.us  | Office of the Attorney General-RUD      | 1400 BRM Tower<br>445 Minnesota St<br>St. Paul,<br>MN<br>551012131           | Electronic Service | Yes               | OFF_SL_19-621_19-621 |
| Nathaniel      | Runke                          | nrunke@local49.org                    |   | 611 28th St. NW<br><br>Rochester,<br>MN<br>55901                             | Electronic Service | No                | OFF_SL_19-621_19-621 |
| Ronald C       | Schirmer                       | ronald.schirmer@mnsu.edu              | Department of Anthropology              | 359 Trafton Science Center N<br><br>Mankato,<br>MN<br>56001                  | Electronic Service | No                | OFF_SL_19-621_19-621 |
| Will           | Seuffert                       | Will.Seuffert@state.mn.us             | Public Utilities Commission             | 121 7th PI E Ste 350<br><br>Saint Paul,<br>MN<br>55101                       | Electronic Service | Yes               | OFF_SL_19-621_19-621 |
|                |                                |                                       |   |  |                    |                   |                      |

| First Name | Last Name      | Email                          | Company Name                              | Address  | Delivery Method    | View Trade Secret | Service List Name    |
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| Janet      | Shaddix Elling | jshaddix@janetshaddix.com      | Shaddix And Associates                    | 7400 Lyndale Ave S Ste 190<br><br>Richfield,<br>MN<br>55423          | Electronic Service | Yes               | OFF_SL_19-621_19-621 |
| Cheyenne   | St. John       | cheyenne.stjohn@lowersioux.com | Lower Sioux Tribal Community              | 39527 Reservation Hwy 1<br><br>Morton,<br>MN<br>56270                | Electronic Service | No                | OFF_SL_19-621_19-621 |
| Haley      | Waller Pitts   | hwallerpitts@fredlaw.com       | Fredrikson & Byron, P.A.                  | 200 S 6th St Ste 4000<br><br>Minneapolis,<br>MN<br>55402             | Electronic Service | No                | OFF_SL_19-621_19-621 |
| Cynthia    | Warzecha       | cynthia.warzecha@state.mn.us   | Minnesota Department of Natural Resources | 500 Lafayette Road<br>Box 25<br>St. Paul,<br>Minnesota<br>55155-4040 | Electronic Service | No                | OFF_SL_19-621_19-621 |

| First Name     | Last Name          | Email                                | Company Name  | Address   | Delivery Method    | View Trade Secret | Service List Name    |
|----------------|--------------------|--------------------------------------|---|---|--------------------|-------------------|----------------------|
| Sarah          | Beimers            | sarah.beimers@state.mn.us            | Department of Administration - State Historic Preservation Office | 50 Sherburne Avenue<br>Suite 203<br>St. Paul,<br>MN<br>55155  | Electronic Service | No                | OFF_SL_19-486_19-486 |
| Christina      | Brusven            | cbrusven@fredlaw.com                 | Fredrikson Byron  | 200 S 6th St Ste 4000<br><br>Minneapolis,<br>MN<br>554021425  | Electronic Service | Yes               | OFF_SL_19-486_19-486 |
| Generic Notice | Commerce Attorneys | commerce.attorneys@ag.state.mn.us    | Office of the Attorney General-DOC                                | 445 Minnesota Street Suite 1400<br><br>St. Paul,<br>MN<br>55101   | Electronic Service | Yes               | OFF_SL_19-486_19-486 |
| Richard        | Dornfeld           | Richard.Dornfeld@ag.state.mn.us      | Office of the Attorney General-DOC                                | Minnesota Attorney General's Office<br>445 Minnesota Street,<br>Suite 1800<br>Saint Paul,<br>Minnesota<br>55101 | Electronic Service | No                | OFF_SL_19-486_19-486 |
| Kate           | Fairman            | kate.frantz@state.mn.us              | Department of Natural Resources                                   | Box 32<br>500 Lafayette Rd<br>St. Paul,<br>MN<br>551554032  | Electronic Service | No                | OFF_SL_19-486_19-486 |
| Annie          | Felix Gerth        | annie.felix-gerth@state.mn.us        |   | Board of Water & Soil Resources<br>520 Lafayette Rd<br>Saint Paul,<br>MN<br>55155                               | Electronic Service | No                | OFF_SL_19-486_19-486 |
| Sharon         | Ferguson           | sharon.ferguson@state.mn.us          | Department of Commerce  | 85 7th Place E Ste 280<br><br>Saint Paul,<br>MN<br>551012198  | Electronic Service | No                | OFF_SL_19-486_19-486 |
| Lucas          | Franco             | lfranco@liunagroc.com                | LIUNA   | 81 Little Canada Rd E<br><br>Little Canada,<br>MN<br>55117  | Electronic Service | No                | OFF_SL_19-486_19-486 |
| Brenna         | Gunderson          | Brenna.gunderson@apexcleanenergy.com | Apex Clean Eenergy  | 8665 Hudson Blvd N Ste 110<br><br>Lake Elmo,<br>MN<br>55042   | Electronic Service | Yes               | OFF_SL_19-486_19-486 |
| Kate M         | Heins              | kate.heins@apexcleanenergy.com       | Apex Clean Energy   | 310 4th St NE Ste 200<br><br>Charlottesville,<br>VA<br>22902  | Electronic Service | Yes               | OFF_SL_19-486_19-486 |



| First Name | Last Name    | Email                                 | Company Name                                 | Address   | Delivery Method    | View Trade Secret | Service List Name    |
|------------|--------------|---------------------------------------|--|---|--------------------|-------------------|----------------------|
| Kari       | Howe         | kari.howe@state.mn.us                 | DEED   | 332 Minnesota St, #E200<br>1ST National Bank Bldg<br>St. Paul,<br>MN<br>55101 | Electronic Service | No                | OFF_SL_19-486_19-486 |
| Dylan      | Ikkala       | dylan.ikkala@apexcleanenergy.com      | Apex Clean Energy                            | 8665 Hudson Blvd N Ste 110<br><br>Lake Elmo,<br>MN<br>55042                   | Electronic Service | Yes               | OFF_SL_19-486_19-486 |
| Ray        | Kirsch       | Raymond.Kirsch@state.mn.us            | Department of Commerce                       | 85 7th Place E Ste 500<br><br>St. Paul,<br>MN<br>55101                        | Electronic Service | No                | OFF_SL_19-486_19-486 |
| Stacy      | Kotch Egstad | Stacy.Kotch@state.mn.us               | MINNESOTA<br>DEPARTMENT OF<br>TRANSPORTATION | 395 John Ireland Blvd.<br><br>St. Paul,<br>MN<br>55155                        | Electronic Service | No                | OFF_SL_19-486_19-486 |
| Karen      | Kromar       | karen.kromar@state.mn.us              | MN Pollution Control<br>Agency               | 520 Lafayette Rd<br><br>Saint Paul,<br>MN<br>55155                            | Electronic Service | No                | OFF_SL_19-486_19-486 |
| Chris      | Kunkle       | chris.kunkle@apexcleanenergy.com      | Apex Clean Energy                            | 8665 Hudson Blvd North,<br>Suite 110<br><br>Lake Elmo,<br>MN<br>55042         | Electronic Service | No                | OFF_SL_19-486_19-486 |
| James      | LaFave       | james.lafave@state.mn.us              | Office of Administrative<br>Hearings         | 600 N Robert Street<br><br>St. Paul,<br>MN<br>55164-0620                      | Electronic Service | No                | OFF_SL_19-486_19-486 |
| Samantha J | Odegard      | samanthao@uppersiouxcommunity-nsn.gov | Upper Sioux Tribal<br>Community              | PO Box 147<br><br>Granite Falls,<br>MN<br>56241                               | Electronic Service | No                | OFF_SL_19-486_19-486 |
| Kevin      | Pranis       | kpranis@liunagroc.com                 | Laborers' District Council of<br>MN and ND   | 81 E Little Canada Road<br><br>St. Paul,<br>Minnesota<br>55117                | Electronic Service | No                | OFF_SL_19-486_19-486 |
|            |              |                                       |  |   |                    |                   |                      |

| First Name     | Last Name                      | Email                                    | Company Name                          | Address   | Delivery Method    | View Trade Secret | Service List Name    |
|----------------|--------------------------------|--|---------------------------------------|---|--------------------|-------------------|----------------------|
| Peter          | Rademacher                     | prademacher@hogenadam<br>s.com           |                                       | 1935 County Road B2<br>West<br>Suite 460<br>St. Paul,<br>Minnesota<br>55113 | Electronic Service | No                | OFF_SL_19-486_19-486 |
| Generic Notice | Residential Utilities Division | residential.utilities@ag.stat<br>e.mn.us | Office of the Attorney<br>General-RUD | 1400 BRM Tower<br>445 Minnesota St<br>St. Paul,<br>MN<br>551012131          | Electronic Service | Yes               | OFF_SL_19-486_19-486 |
| Stephan        | Roos                           | stephan.roos@state.mn.us                 | MN Department of<br>Agriculture       | 625 Robert St N<br><br>Saint Paul,<br>MN<br>55155-2538                      | Electronic Service | No                | OFF_SL_19-486_19-486 |
| Nathaniel      | Runke                          | nrunke@local49.org                       |                                       | 611 28th St. NW<br><br>Rochester,<br>MN<br>55901                            | Electronic Service | No                | OFF_SL_19-486_19-486 |
| Ronald C       | Schirmer                       | ronald.schirmer@mnsu.edu                 | Department of<br>Anthropology         | 359 Trafton Science Center<br>N<br><br>Mankato,<br>MN<br>56001              | Electronic Service | No                | OFF_SL_19-486_19-486 |
| Will           | Seuffert                       | Will.Seuffert@state.mn.us                | Public Utilities Commission           | 121 7th Pl E Ste 350<br><br>Saint Paul,<br>MN<br>55101                      | Electronic Service | Yes               | OFF_SL_19-486_19-486 |
| Janet          | Shaddix Elling                 | jshaddix@janetshaddix.co<br>m            | Shaddix And Associates                | 7400 Lyndale Ave S Ste<br>190<br><br>Richfield,<br>MN<br>55423              | Electronic Service | Yes               | OFF_SL_19-486_19-486 |
| Cheyenne       | St. John                       | cheyenne.stjohn@lowersio<br>ux.com       | Lower Sioux Tribal<br>Community       | 39527 Reservation Hwy 1<br><br>Morton,<br>MN<br>56270                       | Electronic Service | No                | OFF_SL_19-486_19-486 |
| Haley          | Waller Pitts                   | hwallerpitts@fredlaw.com                 | Fredrikson & Byron, P.A.              | 200 S 6th St Ste 4000<br><br>Minneapolis,<br>MN<br>55402                    | Electronic Service | Yes               | OFF_SL_19-486_19-486 |
|                |                                |  |                                       |   |                    |                   |                      |

| First Name | Last Name | Email                        | Company Name                              | Address  | Delivery Method    | View Trade Secret | Service List Name    |
|------------|-----------|------------------------------|---|--|--------------------|-------------------|----------------------|
| Cynthia    | Warzecha  | cynthia.warzecha@state.mn.us | Minnesota Department of Natural Resources | 500 Lafayette Road<br>Box 25<br>St. Paul,<br>Minnesota<br>55155-4040 | Electronic Service | No                | OFF_SL_19-486_19-486 |

| First Name     | Last Name          | Email                                | Company Name  | Address   | Delivery Method    | View Trade Secret | Service List Name    |
|----------------|--------------------|--------------------------------------|---|---|--------------------|-------------------|----------------------|
| Sarah          | Beimers            | sarah.beimers@state.mn.us            | Department of Administration - State Historic Preservation Office | 50 Sherburne Avenue<br>Suite 203<br>St. Paul,<br>MN<br>55155  | Electronic Service | No                | OFF_SL_19-620_19-620 |
| Christina      | Brusven            | cbrusven@fredlaw.com                 | Fredrikson Byron  | 200 S 6th St Ste 4000<br><br>Minneapolis,<br>MN<br>554021425  | Electronic Service | Yes               | OFF_SL_19-620_19-620 |
| Generic Notice | Commerce Attorneys | commerce.attorneys@ag.state.mn.us    | Office of the Attorney General-DOC                                | 445 Minnesota Street Suite 1400<br><br>St. Paul,<br>MN<br>55101   | Electronic Service | Yes               | OFF_SL_19-620_19-620 |
| Richard        | Dornfeld           | Richard.Dornfeld@ag.state.mn.us      | Office of the Attorney General-DOC                                | Minnesota Attorney General's Office<br>445 Minnesota Street,<br>Suite 1800<br>Saint Paul,<br>Minnesota<br>55101 | Electronic Service | No                | OFF_SL_19-620_19-620 |
| Adam           | Duininck           | aduininck@ncsrcc.org                 | North Central States Regional Council of Carpenters               | 700 Olive Street<br><br>St. Paul,<br>MN<br>55130  | Electronic Service | No                | OFF_SL_19-620_19-620 |
| Sharon         | Ferguson           | sharon.ferguson@state.mn.us          | Department of Commerce  | 85 7th Place E Ste 280<br><br>Saint Paul,<br>MN<br>551012198  | Electronic Service | No                | OFF_SL_19-620_19-620 |
| Lucas          | Franco             | lfranco@liunagroc.com                | LIUNA   | 81 Little Canada Rd E<br><br>Little Canada,<br>MN<br>55117  | Electronic Service | No                | OFF_SL_19-620_19-620 |
| Brenna         | Gunderson          | Brenna.gunderson@apexcleanenergy.com | Apex Clean Eenergy  | 8665 Hudson Blvd N Ste 110<br><br>Lake Elmo,<br>MN<br>55042   | Electronic Service | No                | OFF_SL_19-620_19-620 |
| Kate M         | Heins              | kate.heins@apexcleanenergy.com       | Apex Clean Energy   | 310 4th St NE Ste 200<br><br>Charlottesville,<br>VA<br>22902  | Electronic Service | No                | OFF_SL_19-620_19-620 |
| Stacy          | Kotch Egstad       | Stacy.Kotch@state.mn.us              | MINNESOTA DEPARTMENT OF TRANSPORTATION                            | 395 John Ireland Blvd.<br><br>St. Paul,<br>MN<br>55155  | Electronic Service | No                | OFF_SL_19-620_19-620 |

| First Name     | Last Name                      | Email                                 | Company Name                       | Address  | Delivery Method    | View Trade Secret | Service List Name    |
|----------------|--------------------------------|---------------------------------------|------------------------------------|--|--------------------|-------------------|----------------------|
| Karen          | Kromar                         | karen.kromar@state.mn.us              | MN Pollution Control Agency        | 520 Lafayette Rd<br>Saint Paul,<br>MN<br>55155                           | Electronic Service | No                | OFF_SL_19-620_19-620 |
| Chris          | Kunkle                         | chris.kunkle@apexcleanenergy.com      | Apex Clean Energy                  | 8665 Hudson Blvd North,<br>Suite 110<br><br>Lake Elmo,<br>MN<br>55042    | Electronic Service | No                | OFF_SL_19-620_19-620 |
| James          | LaFave                         | james.lafave@state.mn.us              | Office of Administrative Hearings  | 600 N Robert Street<br><br>St. Paul,<br>MN<br>55164-0620                 | Electronic Service | No                | OFF_SL_19-620_19-620 |
| Samantha J     | Odegard                        | samanthao@uppergiouxcommunity-nsn.gov | Upper Sioux Tribal Community       | PO Box 147<br><br>Granite Falls,<br>MN<br>56241                          | Electronic Service | No                | OFF_SL_19-620_19-620 |
| Peter          | Rademacher                     | prademacher@hogenadams.com            |                                    | 1935 County Road B2 West<br>Suite 460<br>St. Paul,<br>Minnesota<br>55113 | Electronic Service | No                | OFF_SL_19-620_19-620 |
| Generic Notice | Residential Utilities Division | residential.utilities@ag.state.mn.us  | Office of the Attorney General-RUD | 1400 BRM Tower<br>445 Minnesota St<br>St. Paul,<br>MN<br>551012131       | Electronic Service | Yes               | OFF_SL_19-620_19-620 |
| Nathaniel      | Runke                          | nrunke@local49.org                    |                                    | 611 28th St. NW<br><br>Rochester,<br>MN<br>55901                         | Electronic Service | No                | OFF_SL_19-620_19-620 |
| Ronald C       | Schirmer                       | ronald.schirmer@mnsu.edu              | Department of Anthropology         | 359 Trafton Science Center N<br><br>Mankato,<br>MN<br>56001              | Electronic Service | No                | OFF_SL_19-620_19-620 |
| Will           | Seuffert                       | Will.Seuffert@state.mn.us             | Public Utilities Commission        | 121 7th Pl E Ste 350<br><br>Saint Paul,<br>MN<br>55101                   | Electronic Service | Yes               | OFF_SL_19-620_19-620 |
|                |                                |                                       |                                    |  |                    |                   |                      |

| First Name | Last Name      | Email                              | Company Name                                 | Address  | Delivery Method    | View Trade Secret | Service List Name    |
|------------|----------------|------------------------------------|--|--|--------------------|-------------------|----------------------|
| Janet      | Shaddix Elling | jshaddix@janetshaddix.com          | Shaddix And Associates                       | 7400 Lyndale Ave S Ste 190<br><br>Richfield,<br>MN<br>55423          | Electronic Service | Yes               | OFF_SL_19-620_19-620 |
| Cheyenne   | St. John       | cheyenne.stjohn@lowersio<br>ux.com | Lower Sioux Tribal<br>Community              | 39527 Reservation Hwy 1<br><br>Morton,<br>MN<br>56270                | Electronic Service | No                | OFF_SL_19-620_19-620 |
| Haley      | Waller Pitts   | hwallerpitts@fredlaw.com           | Fredrikson & Byron, P.A.                     | 200 S 6th St Ste 4000<br><br>Minneapolis,<br>MN<br>55402             | Electronic Service | No                | OFF_SL_19-620_19-620 |
| Cynthia    | Warzecha       | cynthia.warzecha@state.m<br>n.us   | Minnesota Department of<br>Natural Resources | 500 Lafayette Road<br>Box 25<br>St. Paul,<br>Minnesota<br>55155-4040 | Electronic Service | No                | OFF_SL_19-620_19-620 |