

September 19, 2025

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

RE: Comments of the Minnesota Department of Commerce  
Docket No. E002, ET2, E015, E017, ET6135/CN-25-116

Dear Ms. Bergman:

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

*Exemption Request on the Matter of the Application for a Certificate of  
Need for the Bison to Alexandria Second Circuit 345 KV Transmission Line  
Project*

The Petition was filed by Great River Energy, Minnesota Power, Otter Tail Power Company, Western Minnesota Municipal Power Agency and Northern States Power Company, doing business as Xcel Energy (Applicants).

The Department recommends acceptance of the exemptions with modifications and is available to answer any questions the Minnesota Public Utilities Commission may have.

Sincerely,

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

DH, SR/ad



## Before the Minnesota Public Utilities Commission

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### Comments of the Minnesota Department of Commerce

Docket No. E002, ET2, E015, E017, ET6135/CN-25-116

#### I. INTRODUCTION

On August 29, 2025, Applicants filed a request for exemption from certain Certificate of Need (CN) application requirements for the Bison to Alexandria second circuit 345 kilovolt (kV) transmission line project (Bison to Alexandria LHVTL project or Project).<sup>1</sup> Applicants filed the request on August 15, 2025.<sup>2</sup>

Applicants propose a 345 kV transmission circuit between existing Substations at Bison and Alexandria.<sup>3</sup> The existing substations are already equipped for 345 kV and constructed as double-circuit capable from the Fargo – St. Cloud 345 kilovolt Transmission Project. Clay, Wilkin, Otter Tail, Grant, and Douglas counties will be affected by the project.

The Project addresses reliability issues with increased transmission capacity.<sup>4</sup> Increased capacity allows transport of more electricity from generation resources in Western Minnesota, North Dakota, and South Dakota.<sup>5</sup> The proposed line originated in the from the Long-Range Transmission Planning (LRTP) Tranche 2.1 Portfolio, where LRTP projects were developed by the Midcontinent Independent System Operator (MISO).<sup>6</sup>

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<sup>1</sup> *In the Matter of the Application for a Certificate of need for the Bison to Alexandria Second Circuit 345 kV Transmission Line Project, Notice of Comment Period on Request for Exemption From Certain Certificate of Need Application Content Requirements*, August 29, 2025, Docket No. E002, ET2, E015, E017, ET6135/CN-25-116 (eDockets) [20258-222542-01](#) at 1. (Hereinafter “Notice”).

<sup>2</sup> *Request for Exemption From Certain Certificate of Need Content Requirements*, Great River Energy, Minnesota Power, Otter Tail Power Company, Western Minnesota Municipal Power Agency, and Xcel Energy, August 15, 2025, Docket No. E002, ET2, E015, E017, ET6135/CN-25-116 (eDockets) [20258-222169-01](#) at 1. (Hereinafter “Request for Exemptions”).

<sup>3</sup> Request for Exemptions at 1.

<sup>4</sup> Petition at 2.

<sup>5</sup> Request for Exemptions at 4.

<sup>6</sup> Request for Exemptions at 3.

## II. PROCEDURAL BACKGROUND

|                  |                                                                                                                                       |
|------------------|---------------------------------------------------------------------------------------------------------------------------------------|
| February 7, 2025 | Applicants filed a Notice of Intent to Construct. <sup>7</sup>                                                                        |
| August 15, 2025  | Applicants filed a request for exemption from certain Certificate of Need Application content requirements. <sup>8</sup>              |
| August 29, 2025  | Commission opens comment on Applicants' request for exemption from certain Certificate of Need application requirements. <sup>9</sup> |

The July 15 Commission's Notice opened the following topics for comment:

- Should the Commission grant the exemptions to the certificate of need application content requirements as requested by the Applicants in their August 15, 2025, filing?<sup>10</sup>

## III. DEPARTMENT ANALYSIS

### A. GOVERNING STATUTES AND RULES

The Applicants filed the Exemption Petition pursuant to Minn. R. 7849.0200, subp. 6, which states, in part:

Before submitting an application, a person is exempted from any data requirement of parts 7849.0010 to 7849.0400 if the person (1) requests an exemption from specified rules, in writing to the commission, and (2) shows that the data requirement is unnecessary to determine the need for the proposed facility or may be satisfied by submitting another document. A request for exemption must be filed at least 45 days before submitting an application.<sup>11</sup>

Based on this standard, the Commission may grant exemptions when the data requirements are shown to be unnecessary to determine need or can be satisfied by submitting alternative information.

### B. REPORTING OF PROJECTED LOSSES

Minn. R. 7849.0260 A(3) requires an applicant to provide "the expected losses under projected maximum loading and under projected average loading in the length of the transmission line and at the

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<sup>7</sup> Notice of Intent to Construct, Own, And Maintain the Bison Alexandria 345 kV Transmission Line Project, Great River Energy, Minnesota Power, Otter Tail Power Company, Western Minnesota Municipal Power Agency, and Xcel Energy, February 7, 2025, Docket No. E002, Et2, E015, E017, Et6135/Cn-25-116 (eDockets) [20252-215108-01](#).

<sup>8</sup> Request for Exemptions at 1.

<sup>9</sup> Notice at 1.

<sup>10</sup> *Ibid.*

<sup>11</sup> [Minn. R. 7849.0200](#), subp. 6.

terminals or substations.”<sup>12</sup> Minn. R. 7849.0260 C(6) requires an applicant to provide “its efficiency, expressed for a transmission facility as the estimated losses under projected maximum loading and under projected average loading in the length of the transmission line and at the terminals or substations.”<sup>13</sup>

The Applicants request an exemption from Minn. R. 7849.0260 A(3) and Minn. r. C(6).<sup>14</sup> The Applicants propose to provide system losses information in lieu of line-specific losses required by the rules.<sup>15</sup>

The Department agrees with the Applicants that the requested exemptions are consistent with several prior exemption requests approved by the Commission in other Certificate of Need transmission line dockets and is more relevant to the analysis.<sup>16</sup> Therefore, the Department recommends that the Commission approve the requested exemption from Minn. R. 7849.0260 A(3) and Minn. R. 7849.0260 C(6), with provision of the proposed alternative data.

*C. DISCUSSION OF THE AVAILABILITY OF ALTERNATIVE LINES WITH  
DIFFERENT TERMINALS OR SUBSTATIONS*

The Applicants seek exemptions from the discussion of alternatives to the Bison to Alexandria LHVTL project under Minn. R. 7849.0260 B(4) and Minn. R. 7849.0260 B(8).<sup>17</sup>

Minn. R. 7849.0260 B(4) requires a discussion of “transmission lines with different terminals or substations.”<sup>18</sup> Likewise, clause B(8) of that rule requires a discussion of “any reasonable combination of the alternatives.”<sup>19</sup> Minn. Stat. § 216B.243, subd. 3(6), however, states that “the [C]ommission must not require evaluation of alternative end points for a high-voltage transmission line qualifying as a large energy facility unless the alternative end points are (i) consistent with end points identified in a federally registered planning authority transmission plan, or (ii) otherwise agreed to for further evaluation by the applicant.”

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<sup>12</sup> [Minn. R. 7849.0260 A\(3\)](#).

<sup>13</sup> [Minn. R. 7849.0260 C\(6\)](#).

<sup>14</sup> [Minn. R. 7849.0260 A\(3\)](#) and C(6). Request for Exemption at 7.

<sup>15</sup> Request for Exemptions at 7.

<sup>16</sup> The Department verified prior exemptions to the dockets cited by the Applicants. Consent Items, Docket No. O. E002, E017, ET2, E015, ET10/CN-22-538 (eDockets) [20234-194896-04](#) at 1. Comments Of The Minnesota Department Of Commerce, March 30, 2023, E002, E017, ET2, E015, ET10/CN-22-538 (eDockets) [20233-194320-02](#) at 3. In the Matter of the Application of Xcel Energy and ITC Midwest, LLC for the HuntleyWilmarth 345 KV Transmission Line Project, Order, September 1, 2017, Docket No. E-002,ET-6675/CN-17-184 (eDockets) [20179-135212-01](#) at 1. Comments of the Minnesota Department of Commerce, August 3, 2017, Docket No. E002, ET6675/CN-17-184 (eDockets) [20177-134081-01](#) at 3. In the Matter of the Application of Northern States Power Company d/b/a Xcel Energy for a Certificate of Need for the Upgrade of the Southwest Twin Cities Bluff Creek – Westgate Area 69 kV Transmission Line to 115 kV Capacity, Order, November 16, 201, Docket No. E-002/CN-11-332 (eDockets) [201111-68376-01](#). Comments of the Minnesota Department of Commerce, August 3, 2011, Division of Energy Resources, DOCKET NO. E002/CN-11-332 (eDockets) [20118-64960-01](#) at 3.

<sup>17</sup> [Minn. R. 7849.0260 B\(4\)](#) and B(8).

<sup>18</sup> [Minn. R. 7849.0260 A\(3\)](#).

<sup>19</sup> [Minn. R. 7849.0260 B\(8\)](#).

The only end points identified in the Bison to Alexandria LHVTL project are those proposed by the Applicants, and the Applicants have not agreed to an evaluation of an alternative.<sup>20</sup> Thus, the Applicants' request an exemption from analyzing alternative endpoints for the Project consistent with Minn. Stat. § 216B.243, subd. 3(6). The Department agrees with the Applicants that Minnesota Statutes limit the consideration of alternative end points in this matter and, therefore, an exemption is appropriate.

The Department recommends that the Commission approve the requested exemption from Minn. R. 7849.0260 B(4) and 7849.0260 B(8), with provision of the proposed alternative data.

#### *D. DISCUSSION OF EFFECT ON RATES*

Minn. R. 7849.0260 C (5) requires an applicant provide for the proposed facility“ an estimate of its effect on rates systemwide and in Minnesota, assuming a test year beginning with the proposed in-service date.”<sup>21</sup>

The Applicants request exemption from this rule and propose an alternate solution.<sup>22</sup> Instead, Applicants would provide the necessary information to determine the effect on rates—estimated cost of the project, general information on how the costs would be allocated across the MISO footprint and estimates of the revenue requirement for capital costs for 20 years into the future. The Applicants further note that similar requests have been granted in previous projects.

The Department concludes that:

- the proposed data will provide enough information to estimate the revenue requirement;
- information regarding how the costs for LRTP projects are actually allocated across the MISO footprint is a reasonable data source to estimate systemwide rates and in Minnesota; and
- similar request has been granted before this docket.<sup>23</sup>

With provision of the proposed alternative data, the Department recommends approval of the exemption.

#### *E. FORECAST ON PEAK DEMAND AND ANNUAL CONSUMPTION*

Minn. R. 7849.0270, subp. 1 to 6 requires an applicant for a CN to provide detailed forecasting information.<sup>24</sup><sup>25</sup> is Applicants state that the project serves multiple reasons, such as thermal and voltage issues and to increase transmission line capacity.<sup>26</sup> The Applicants request an exemption from

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<sup>20</sup> Request for Exemptions at 8.

<sup>21</sup> [Minn. R. 7849.0260](#) C(5).

<sup>22</sup> Request for Exemptions at 8.

<sup>23</sup> ORDER ACCEPTING Applications as COMPLETE and Establishing Procedural Requirements, December 5, 2023, Docket No. E-002, E-017, ET-2, E-015, ET-10/CN-22-538 (eDockets) [202312-200978-01](#) at 5.

<sup>24</sup> [Minn. R. 7826.0270](#) subps. 1 to 6.

<sup>25</sup> [Minn. R. 7849.0270](#) subps. 1-6

<sup>26</sup> Request for Exemption at 9.

Minn. R. 7849.0270 subp. 1 to 6 and propose to provide information regarding the forecasts used by MISO and the Applicants to assess the need for the proposed Project.<sup>27</sup>

The Department agrees that the use of information actually used by MISO and the Applicants is superior to the use of the information required by the rule. Therefore, the Department recommends that the Commission grant the exemption.

#### F. FORECAST OF ANNUAL REVENUE REQUIREMENTS

Minn. R. 7849.0270, subp. 2E requires an applicant for a CN to provide the estimated annual revenue requirement per kilowatt hour for the system in current dollars.<sup>28</sup> The Applicants request an exemption from this rule and instead propose to provide information regarding how the costs for LRTP projects are shared within the MISO footprint.<sup>29</sup> The Applicants also propose to provide a revenue requirement forecast for the capital costs for a 20-year period.

The Department agrees that providing information regarding how the costs for LRTP projects are actually allocated across the MISO footprint is superior to using the information required by the rule. The Department also notes that a similar request for exemption has been granted before.<sup>30</sup> Therefore, the Department recommends that the Commission grant the requested exemption to Minnesota Rules 7849.0270 subp. 2E with the provision of the proposed alternative data.

#### G. CAPACITY OF THE SYSTEM

Minnesota Rules 7849.0280 requires an applicant for a CN to provide information that describes the ability of its existing system to meet forecasted demand; in essence, load and capability information.<sup>31</sup>

The Applicants request that the Commission grant an exemption from Minn. R. 7849.0280, subparts B through I.<sup>32</sup> The Applicants note that the Commission has previously granted exemption requests from parts of Minn. R. 7849.0280 in several other transmission line Certificate of Need dockets where issues of transmission adequacy, rather than generation adequacy, were at issue.<sup>33</sup>

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<sup>27</sup> Request for Exemption at 9.

<sup>28</sup> [Minn. R. 7849.0270](#), subp. 2E.

<sup>29</sup> Request for Exemptions at 10.

<sup>30</sup> *In the Matter of the Application for a Certificate of Need for the Big Stone South – Alexandria – Big Oaks Transmission Project*, Comments of the Minnesota Department of Commerce, March 30, 2023, Docket No. E002, E017, ET2, E015, ET10/CN-22-538 (eDockets) [20233-194320-02](#) at 4. *In the Matter of the Application for a Certificate of Need for the Big Stone South – Alexandria – Big Oaks Transmission Project, Order*, April 19, 2023, Docket No. E-017, ET-2, E-002, ET-10, E-015/CN-22-538 (eDockets) [20234-194943-01](#) at 1.

<sup>31</sup> See [Minn. R. 7849.0280](#) subp. B through I.

<sup>32</sup> Request for Exemptions at 11.

<sup>33</sup> The Applicants cite the following examples: *In the Matter of the Application for a Certificate of Need for the Big Stone South – Alexandria – Big Oaks Transmission Project, Order*, April 19, 2023, Docket No. E-017, ET-2, E-002, ET-10, E-015/CN-22-538 (eDockets) [20234-194943-01](#) at 1. *In the Matter of the Application Completeness Certificate of Need for Two Gen-Tie Lines from Sherburne County to Lyon County, Order*, May 2, 2023, Docket No. E-002/CN-22-131 (eDockets) [20235-195506-01](#) at 1. *In the Matter of the Application of Minnesota Power for a Certificate of Need for the HVDC Modernization Project, Order*, Feb. 1, 2023, Docket No. E015/CN-22-607 (eDockets) [20232-192809-01](#) at 1.

The Department agrees with the Applicants that the Commission has approved exemptions to Minn. R. 7849.0280, subparts B through I in similar circumstances.<sup>34</sup> Also, the Department agrees that subparts B through I generally pertain to generation adequacy and do not address transmission planning.<sup>35</sup> For those reasons, the Department recommends acceptance of exemption from Minn. R. 0280, subparts B through I.<sup>36</sup>

*H. MINN. R. 7849.0290– CONSERVATION AND ENERGY EFFICIENCY*

Minn. R. 7849.0290 requires the applicant for a CN to provide conservation program information and quantification of the impact of conservation programs on forecast data.<sup>37</sup>

Instead of the required information, the Applicants propose to provide:

- substitute information related either to their conservation programs or to the conservation programs that are available to their members serving load in Minnesota; and
- information regarding how conservation and energy efficiency was considered by MISO in its evaluation of the proposed Project.<sup>38</sup>

The Department agrees that the proposed information, particularly how MISO considered energy efficiency, will better inform the record as to the need for the proposed Project than the required information. Therefore, the Department recommends that the Commission grant the requested exemption to Minn. R. 7849.0290 with the provision of the proposed alternative data.<sup>39</sup>

*I. CONSEQUENCES OF DELAY*

Minn. R. 7849.0300 requires an applicant to a CN to provide detailed information regarding the consequences of delay at three specific, statistically-based levels of demand and energy consumption.<sup>40</sup> Minn. R. 7849.0340 requires an applicant for a CN to provide detailed information regarding the no build alternative at the same three statistically-based levels of demand and energy consumption.<sup>41</sup>

The Applicants state they “will discuss the consequences of delay and a no build alternative in its application, there is no need to discuss these items in terms of three levels of demand.”<sup>42</sup> In addition, the Applicants note that the Commission has approved similar partial exemption requests from the

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<sup>34</sup> *Id.* See also, [Minn. R. 7849.0280](#), B-I.

<sup>35</sup> See [Minn. R. 7849.0280](#), B-I.

<sup>36</sup> [Minn. R. 7849.0280](#), B-I.

<sup>37</sup> [Minn. R. 7849.0290](#).

<sup>38</sup> Request for Exemptions at 11.

<sup>39</sup> [Minn. R. 7849.0290](#).

<sup>40</sup> [Minn. R. 7849.0300](#).

<sup>41</sup> [Minn. R. 7849.0340](#).

<sup>42</sup> Request for Exemptions at 11.

requirements of Minn. R. 7849.0300 and 7849.0340 in other transmission line Certificate of Need dockets.<sup>43</sup>

The Department agrees with the Applicants that information on the consequences of a no-build alternative tied to three specific statistically-based levels of demand and energy consumption is not likely to be a critical part of the analysis for the proposed Project. Also, the Department believes a general discussion is appropriate. However, it is not entirely clear what the Applicants will discuss. Therefore, the Department recommends that the Applicants' discussion of the consequences of delay and a no-build option will at a minimum include a generalized summary-level discussion.

#### IV. DEPARTMENT RECOMMENDATIONS

Based on analysis of the information in the record, the Department has prepared recommendations, which are provided below. The recommendations correspond to the subheadings of Section III above.

- *B. The Department recommends that the Commission approve the requested exemption from Minn. R. 7849.0260 A(3) and Minn. R. 7849.0260 C(6), with provision of the proposed alternative data.*
- *C. Department recommends that the Commission approve the requested exemption from Minn. R. 7849.0260 B(4) and 7849.0260 B(8), with provision of the proposed alternative data.*
- *D. The Department recommends that the Commission approve the requested exemption from Minn. R. 7849.0260 C (5), with provision of the proposed alternative data.*
- *E. The Department recommends that the Commission approve the requested exemption from Minn. R. 7849.0270, subparts 1 to 6, with provision of the proposed alternative data.*
- *F. The Department recommends that the Commission approve the requested exemption from Minn. R. 7849.0270, subpart 2), with provision of the proposed alternative data.*
- *G. The Department recommends that the Commission approve the requested exemption from Minn. R. 7849.0280, clauses B through I only.*
- *H. The Department recommends that the Commission approve the requested exemption to Minnesota Rules 7849.0290 with the provision of the proposed alternative data.*
- *I. The Department recommends the Commission modify the requested exemption and approve the requested exemption to Minn. R. 7849.0300 and Minn. R. 7839.0340 with the following provision. Applicants' discussion of the consequences of delay and a no-build option will at a minimum include a generalized summary-level discussion.*

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<sup>43</sup> Applicants refer the following documents: *In the Matter of the Application of Minnesota Power for a Certificate of Need for the HVDC Modernization Project, Order*, Docket No. E-015/CN-22-607 (eDockets) [20232-192809-0](#) at 1. *In the Matter of the Application of Minnesota Power for a Certificate of Need for the HVDC Modernization Project*, Comments of the Minnesota Department of Commerce, December 12, 2022, Docket No. E015/CN-22-607 (eDockets) [202212-191260-01](#) at 6.

## **CERTIFICATE OF SERVICE**

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

**Minnesota Department of Commerce**  
**Comments**

**Docket No. E002, ET2, E015, E017, ET6135/CN-25-116**

Dated this 19<sup>th</sup> day of **September 2025**

**/s/Sharon Ferguson**

| #  | First Name | Last Name          | Email                             | Organization                                               | Agency                                                          | Address                                                                                        | Delivery Method    | Alternate Delivery Method | View Trade Secret | Service List Name |
|----|------------|--------------------|-----------------------------------|------------------------------------------------------------|-----------------------------------------------------------------|------------------------------------------------------------------------------------------------|--------------------|---------------------------|-------------------|-------------------|
| 1  | Michael    | Ahern              | ahern.michael@dorsey.com          | Dorsey & Whitney, LLP                                      |                                                                 | 50 S 6th St Ste 1500<br>Minneapolis MN, 55402-1498<br>United States                            | Electronic Service |                           | No                | CN-25-116         |
| 2  | Kristine   | Anderson           | kanderson@greatermngas.com        | Greater Minnesota Gas, Inc.                                |                                                                 | 1900 Cardinal Lane<br>PO Box 798<br>Faribault MN, 55021<br>United States                       | Electronic Service |                           | No                | CN-25-116         |
| 3  | Sasha      | Bergman            | sasha.bergman@state.mn.us         |                                                            | Public Utilities Commission                                     |                                                                                                | Electronic Service |                           | No                | CN-25-116         |
| 4  | Matthew    | Brodin             | mbrodin@allete.com                | Minnesota Power                                            |                                                                 | 30 West Superior Street<br>Duluth MN, 55802<br>United States                                   | Electronic Service |                           | No                | CN-25-116         |
| 5  | Mike       | Bull               | mike.bull@state.mn.us             |                                                            | Public Utilities Commission                                     | 121 7th Place East, Suite 350<br>St. Paul MN, 55101<br>United States                           | Electronic Service |                           | Yes               | CN-25-116         |
| 6  | James      | Canaday            | james.canaday@ag.state.mn.us      |                                                            | Office of the Attorney General - Residential Utilities Division | Suite 1400 445 Minnesota St.<br>St. Paul MN, 55101<br>United States                            | Electronic Service |                           | No                | CN-25-116         |
| 7  | Cody       | Chilson            | cchilson@greatermngas.com         | Greater Minnesota Gas, Inc. & Greater MN Transmission, LLC |                                                                 | 1900 Cardinal Ln<br>PO Box 798<br>Faribault MN, 55021<br>United States                         | Electronic Service |                           | No                | CN-25-116         |
| 8  | Ray        | Choquette          | rchoquette@agp.com                | Ag Processing Inc.                                         |                                                                 | 12700 West Dodge Road<br>PO Box 2047<br>Omaha NE, 68103-2047<br>United States                  | Electronic Service |                           | No                | CN-25-116         |
| 9  | John       | Coffman            | john@johncoffman.net              | AARP                                                       |                                                                 | 871 Tuxedo Blvd.<br>St. Louis MO, 63119-2044<br>United States                                  | Electronic Service |                           | No                | CN-25-116         |
| 10 | Generic    | Commerce Attorneys | commerce.attorneys@ag.state.mn.us |                                                            | Office of the Attorney General - Department of Commerce         | 445 Minnesota Street Suite 1400<br>St. Paul MN, 55101<br>United States                         | Electronic Service |                           | Yes               | CN-25-116         |
| 11 | Hillary    | Creurer            | hcreurer@allete.com               | Minnesota Power                                            |                                                                 | 30 W Superior St<br>Duluth MN, 55802<br>United States                                          | Electronic Service |                           | No                | CN-25-116         |
| 12 | George     | Crocker            | gwillc@nawo.org                   | North American Water Office                                |                                                                 | 5093 Keats Avenue<br>Lake Elmo MN, 55042<br>United States                                      | Electronic Service |                           | No                | CN-25-116         |
| 13 | John       | Farrell            | jfarrell@ilsr.org                 | Institute for Local Self-Reliance                          |                                                                 | 2720 E. 22nd St<br>Institute for Local Self-Reliance<br>Minneapolis MN, 55406<br>United States | Electronic Service |                           | No                | CN-25-116         |

| #  | First Name | Last Name | Email                         | Organization                     | Agency                 | Address                                                                             | Delivery Method    | Alternate Delivery Method | View Trade Secret | Service List Name |
|----|------------|-----------|-------------------------------|----------------------------------|------------------------|-------------------------------------------------------------------------------------|--------------------|---------------------------|-------------------|-------------------|
| 14 | Eric       | Fehlhaber | efehlhaber@dakotaelectric.com | Dakota Electric Association      |                        | 4300 220th St W<br>Farmington MN, 55024<br>United States                            | Electronic Service |                           | No                | CN-25-116         |
| 15 | Sharon     | Ferguson  | sharon.ferguson@state.mn.us   |                                  | Department of Commerce | 85 7th Place E Ste 280<br>Saint Paul MN, 55101-2198<br>United States                | Electronic Service |                           | No                | CN-25-116         |
| 16 | Daryll     | Fuentes   | energy@usg.com                | USG Corporation                  |                        | 550 W Adams St<br>Chicago IL, 60661<br>United States                                | Electronic Service |                           | No                | CN-25-116         |
| 17 | Todd J.    | Guerrero  | todd.guerrero@kutakrock.com   | Kutak Rock LLP                   |                        | Suite 1750<br>220 South Sixth Street<br>Minneapolis MN, 55402-1425<br>United States | Electronic Service |                           | No                | CN-25-116         |
| 18 | Daniel     | Gunderson | dgunderson@allte.com          | Minnesota Power                  |                        | 30 W Superior St<br>Duluth MN, 55802<br>United States                               | Electronic Service |                           | No                | CN-25-116         |
| 19 | Adam       | Heinen    | aheinen@dakotaelectric.com    | Dakota Electric Association      |                        | 4300 220th St W<br>Farmington MN, 55024<br>United States                            | Electronic Service |                           | No                | CN-25-116         |
| 20 | Annete     | Henkel    | mui@mnuutilityinvestors.org   | Minnesota Utility Investors      |                        | 413 Wacouta Street #230<br>St.Paul MN, 55101<br>United States                       | Electronic Service |                           | No                | CN-25-116         |
| 21 | Corey      | Hintz     | chintz@dakotaelectric.com     | Dakota Electric Association      |                        | 4300 220th Street<br>Farmington MN, 55024-9583<br>United States                     | Electronic Service |                           | No                | CN-25-116         |
| 22 | Michael    | Hoppe     | lu23@ibew23.org               | Local Union 23, I.B.E.W.         |                        | 445 Etna Street Ste. 61<br>St. Paul MN, 55106<br>United States                      | Electronic Service |                           | No                | CN-25-116         |
| 23 | Lori       | Hoyum     | lhoyum@mnpower.com            | Minnesota Power                  |                        | 30 West Superior Street<br>Duluth MN, 55802<br>United States                        | Electronic Service |                           | No                | CN-25-116         |
| 24 | Travis     | Jacobson  | travis.jacobson@mdu.com       | Great Plains Natural Gas Company |                        | 400 N 4th St<br>Bismarck ND, 58501<br>United States                                 | Electronic Service |                           | No                | CN-25-116         |
| 25 | Alan       | Jenkins   | aj@jenkinsatlaw.com           | Jenkins at Law                   |                        | 2950 Yellowtail Ave.<br>Marathon FL, 33050<br>United States                         | Electronic Service |                           | No                | CN-25-116         |
| 26 | Richard    | Johnson   | rick.johnson@lawmoss.com      | Moss & Barnett                   |                        | 150 S. 5th Street<br>Suite 1200<br>Minneapolis MN, 55402<br>United States           | Electronic Service |                           | No                | CN-25-116         |



| #  | First Name     | Last Name                      | Email                                 | Organization                         | Agency                                                          | Address                                                                        | Delivery Method    | Alternate Delivery Method | View Trade Secret | Service List Name |
|----|----------------|--------------------------------|---------------------------------------|--------------------------------------|-----------------------------------------------------------------|--------------------------------------------------------------------------------|--------------------|---------------------------|-------------------|-------------------|
| 39 | David          | Moeller                        | dmoeller@allete.com                   | Minnesota Power                      |                                                                 |                                                                                | Electronic Service |                           | No                | CN-25-116         |
| 40 | Andrew         | Moratzka                       | andrew.moratzka@stoel.com             | Stoel Rives LLP                      |                                                                 | 33 South Sixth St Ste 4200<br>Minneapolis MN, 55402<br>United States           | Electronic Service |                           | No                | CN-25-116         |
| 41 | David          | Niles                          | david.niles@avantenergy.com           | Minnesota Municipal Power Agency     |                                                                 | 220 South Sixth Street Suite 1300<br>Minneapolis MN, 55402<br>United States    | Electronic Service |                           | No                | CN-25-116         |
| 42 | Samantha       | Norris                         | samanthanorris@alliantenergy.com      | Interstate Power and Light Company   |                                                                 | 200 1st Street SE PO Box 351<br>Cedar Rapids IA, 52406-0351<br>United States   | Electronic Service |                           | No                | CN-25-116         |
| 43 | Matthew        | Olsen                          | molsen@otpc.com                       | Otter Tail Power Company             |                                                                 | 215 South Cascade Street<br>Fergus Falls MN, 56537<br>United States            | Electronic Service |                           | No                | CN-25-116         |
| 44 | Carol A.       | Overland                       | overland@legalelectric.org            | Legalelectric - Overland Law Office  |                                                                 | 1110 West Avenue Red Wing MN, 55066<br>United States                           | Electronic Service |                           | No                | CN-25-116         |
| 45 | Greg           | Palmer                         | gpalmer@greatermngas.com              | Greater Minnesota Gas, Inc.          |                                                                 | 1900 Cardinal Ln<br>PO Box 798<br>Faribault MN, 55021<br>United States         | Electronic Service |                           | No                | CN-25-116         |
| 46 | Priti          | Patel                          | ppatel@grenergy.com                   | Great River Energy                   |                                                                 | 12300 Elm Creek Blvd<br>Maple Grove MN, 55369-4718<br>United States            | Electronic Service |                           | No                | CN-25-116         |
| 47 | Jennifer       | Peterson                       | jjpeterson@mnpower.com                | Minnesota Power                      |                                                                 | 30 West Superior Street<br>Duluth MN, 55802<br>United States                   | Electronic Service |                           | No                | CN-25-116         |
| 48 | Catherine      | Phillips                       | catherine.phillips@wecenergygroup.com | Minnesota Energy Resources           |                                                                 | 231 West Michigan St<br>Milwaukee WI, 53203<br>United States                   | Electronic Service |                           | No                | CN-25-116         |
| 49 | Generic Notice | Residential Utilities Division | residential.utilities@ag.state.mn.us  |                                      | Office of the Attorney General - Residential Utilities Division | 1400 BRM Tower 445<br>Minnesota St<br>St. Paul MN, 55101-2131<br>United States | Electronic Service |                           | Yes               | CN-25-116         |
| 50 | Kevin          | Reuther                        | kreuther@mncenter.org                 | MN Center for Environmental Advocacy |                                                                 | 26 E Exchange St, Ste 206<br>St. Paul MN, 55101-1667<br>United States          | Electronic Service |                           | No                | CN-25-116         |
| 51 | Susan          | Romans                         | sromans@allete.com                    | Minnesota Power                      |                                                                 | 30 West Superior Street<br>Legal Dept<br>Duluth MN,                            | Electronic Service |                           | No                | CN-25-116         |

[illegible]

| #  | First Name | Last Name | Email                 | Organization           | Agency | Address                                                                  | Delivery Method    | Alternate Delivery Method | View Trade Secret | Service List Name |
|----|------------|-----------|-----------------------|------------------------|--------|--------------------------------------------------------------------------|--------------------|---------------------------|-------------------|-------------------|
| 64 | Kurt       | Zimmerman | kwz@ibew160.org       | Local Union #160, IBEW |        | 2909 Anthony Ln<br>St Anthony Village MN,<br>55418-3238<br>United States | Electronic Service |                           | No                | CN-25-116         |
| 65 | Patrick    | Zomer     | pat.zomer@lawmoss.com | Moss & Barnett PA      |        | 150 S 5th St #1200<br>Minneapolis MN, 55402<br>United States             | Electronic Service |                           | No                | CN-25-116         |



| #  | First Name | Last Name | Email                         | Organization                              | Agency                          | Address                                                                                                                  | Delivery Method    | Alternate Delivery Method | View Trade Secret | Service List Name         |
|----|------------|-----------|-------------------------------|-------------------------------------------|---------------------------------|--------------------------------------------------------------------------------------------------------------------------|--------------------|---------------------------|-------------------|---------------------------|
| 13 | Jayme      | Trusty    | execdir@swrdc.org             | SWRDC                                     |                                 | 2401 Broadway Ave #1<br>Slayton MN, 56172<br>United States                                                               | Electronic Service |                           | No                | CN - CERTIFICATE OF NEEDS |
| 14 | Jen        | Tyler     | tyler.jennifer@epa.gov        | US Environmental Protection Agency        |                                 | Environmental Planning & Evaluation Unit<br>77 W Jackson Blvd. Mailstop B-19J<br>Chicago IL, 60604-3590<br>United States | Electronic Service |                           | No                | CN - CERTIFICATE OF NEEDS |
| 15 | Cynthia    | Warzecha  | cynthia.warzecha@state.mn.us  | Minnesota Department of Natural Resources |                                 | 500 Lafayette Road<br>Box 25<br>St. Paul MN, 55155-4040<br>United States                                                 | Electronic Service |                           | No                | CN - CERTIFICATE OF NEEDS |
| 16 | Alan       | Whipple   | sa.property@state.mn.us       |                                           | Minnesota Department Of Revenue | Property Tax Division<br>600 N. Robert Street<br>St. Paul MN, 55146-3340<br>United States                                | Electronic Service |                           | No                | CN - CERTIFICATE OF NEEDS |
| 17 | Jonathan   | Wolfgram  | jonathan.wolfgram@state.mn.us |                                           | Office of Pipeline Safety       | 445 Minnesota St Ste 147<br>Woodbury MN, 55125<br>United States                                                          | Electronic Service |                           | No                | CN - CERTIFICATE OF NEEDS |