

April 30, 2024

Will Seuffert
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, E017, ET2, E015, ET10/CN-22-538

Dear Mr. Seuffert:

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

In the Matter of The Application for a Certificate of Need for the Big Stone South—
Alexandria—Big Oaks Transmission Project.

The Petition was filed by Northern States Power Company, on September 29, 2023.

The Department recommends that the Minnesota Public Utilities Commission (Commission) consider the impacts detailed in the Environmental Report, and, if the impacts are acceptable, **approve the Certificate of Need**. The Department is available to answer any questions the Commission may have.

Sincerely,

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

SR/ar
Attachment

Before the Minnesota Public Utilities Commission

Comments of the Minnesota Department of Commerce

Docket No. E002, E017, ET2, E015, ET10/CN-22-538

I. INTRODUCTION

In this proceeding Northern States Power Company, doing business as Xcel Energy (Xcel) and other utilities requested the Minnesota Public Utilities Commission (Commission) approve a certificate of need (CN) for a new 345 kV transmission facilities running from Big Stone City, South Dakota to Alexandria, Minnesota to Sherburne County, Minnesota. These comments analyze the merits of the request for a CN.

A. NOTICE AND EXEMPTION PETITIONS

March 10, 2023, Xcel, along with Great River Energy (GRE), Minnesota Power (MP), Otter Tail Power Company (OTP), and Western Minnesota Municipal Power Agency (WMMPA)¹ (collectively, the Applicants) submitted their *Request for Exemption from Certain Certificate of Need Application Content Requirements* (Exemption Petition). The Exemption Petition provided the Applicants' proposal to be exempted from certain CN application data requirements.

Also, on March 10, 2023 the Applicants submitted their *Notice Plan Petition* (Notice Petition). The Notice Petition provided the Applicants' plan to notify potentially affected members of the public about the CN petition under Minnesota Rules 7849.2550.

Comments on the Exemption Petition and the Notice Petition were filed by Minnesota Department of Commerce, Division of Energy Resources (Department). Reply comments were filed by the Applicants.

On April 19, 2023, the Commission issued an Order approving the Exemption Petition and the Notice Petition.²

C. CERTIFICATE OF NEED PETITION

On September 29, 2023, the Applicants filed their *Application for a Certificate of Need for the Big Stone South—Alexandria—Big Oaks Transmission Project* (Petition).

¹ WMMPA has a formal relationship through which WMMPA finances the construction and acquisition of the generation and transmission facilities for members of Missouri River Energy Services (MRES). MRES staff provides the administrative services to manage WMMPA's portfolios.

² See [20234-194943-01](#)

Comments on completeness of the Petition were filed on October 18, 2023 by several parties:

- Carol A. Overland;
- Citizens Utility Board of Minnesota;
- Department;
- Minnesota Department of Agriculture;
- Minnesota Department of Commerce, Energy Environmental Review and Analysis (Department-EERA);
- LIUNA Minnesota and North Dakota; and
- Operating Engineers Local 49 and North Central States Regional Council of Carpenters.

Reply comments were filed on October 25, 2023 by:

- the Applicants; and
- Minnesota Center for Environmental Advocacy, Clean Grid Alliance, Fresh Energy, the Union of Concerned Scientists, and the National Audubon Society, (collectively the Clean Energy Organizations).

On December 5, 2023, the Commission issued its *Order Accepting Applications as Complete and Establishing Procedural Requirements*.

On February 21, 2024, the Commission issued its *Notice of Comment Period on the Merits of the Certificate of Need Application* (Notice). The Notice established due dates and stated that the following topics are open for comment:

- Are there any contested issues of fact with respect to the representations made in the certificate of need application?
- Should the Commission grant a certificate of need for the proposed project?
- Are there other issues or concerns related to this matter?

Below are the comments of the Department regarding the Petition and the issues specified in the Notice.

II. PROPOSED PROJECT

The Applicants request the Commission approve a CN for a proposed project that would consist of new 345 kV transmission facilities approximately 205 miles long, running between Big Stone City, South Dakota, Alexandria Minnesota, and Sherburne County, Minnesota which would be comprised of two segments:

- Western Segment: approximately 100 miles long, would run from the existing Big Stone South Substation near Big Stone City, South Dakota to the existing Alexandria Substation near Alexandria, Minnesota; and

- Eastern Segment: approximately 105 to 108 miles long, would continue from the existing Alexandria Substation to the Riverview Substation near Freeport, Minnesota to a new Big Oaks Substation in Sherburne County, Minnesota (Project).

The Western Segment will be jointly owned by OTP and WMMPA. OTP will be responsible for maintenance of the Western Segment. The Western Segment consists of a new single-circuit 345 kV transmission line that will be placed on double-circuit capable structures.

The Eastern Segment will be jointly owned by Xcel, GRE, MP, OTP, and WMMPA. GRE is expected to be responsible for the maintenance of the Alexandria—Quarry portion of the Eastern Segment, Xcel is expected to be responsible for maintenance of the Quarry—Big Oaks portion of the Eastern Segment. The Eastern Segment of the Project involves stringing a second 345 kV transmission circuit on existing double-circuit capable structures from the Alexandria Substation to the Big Oaks Substation.³

The Project also includes modifications to the following existing substations:

- Alexandria—modifications to be owned by WMMPA;
- Big Stone South—modifications to be owned by OTP;
- Quarry—modifications to be owned by Xcel; and
- Riverview—modifications to be owned by GRE.

Finally, the Project involves the construction of a new Big Oaks Substation, to be owned by Xcel.

The Applicants' estimated total capital costs for the proposed Project is between \$606.5 million and \$699.4 million (2022\$). Table 2-2 of the Petition shows that this cost estimate includes the costs of the South Dakota portion of the proposed Project. The proposed Project was originally developed by MISO as part of MISO's Long Range Transmission Planning (LRTP) process.⁴ As explained in the Petition, the Applicants' cost estimate for the Project is higher than MISO's cost estimate for several reasons:

The MISO cost estimate did not include the costs associated with the 67 to 78 new foundations and structures that will be required to string the second 345 kV transmission line circuit between the Alexandria Substation and the Big Oaks Substation. The MISO cost estimate also did not include the costs associated with adding reactive equipment and expanding the existing Riverview and Quarry substations. The MISO cost estimate also did not include costs for adding remote end relays at the Big Oaks Substation. In addition, commodity prices in general (material and labor) have also increased since the MISO cost estimate was developed. Furthermore, the

³ The only exception is an approximately one- to four-mile, segment of new right-of-way that is required to connect to the new Big Oaks Substation in Sherburne County, Minnesota.

⁴ MISO's *MTEP21 Addendum LRTP Tranche 1 Report with Executive Summary*, which summarizes MISO's analysis that led to the proposed Project, used an estimate of \$574 million (2022 dollars). See [MTEP21 Report Addendum](#)

Applicants' cost estimates for both the labor and material for the Project's conductor is higher than the MISO estimate.

III. DEPARTMENT ANALYSIS

Minnesota Statutes § 216B.2421, subd. 2(1) defines a large energy facility (LEF) as "any high-voltage transmission line with a capacity of 200 kilovolts or more and greater than 1,500 feet in length." Since the proposed Project is 345 kV and over 100-miles long, it qualifies as an LEF. Minnesota Statutes § 216B.243, subd. 2 states that "no large energy facility shall be sited or constructed in Minnesota without the issuance of a certificate of need by the Commission..." Therefore, a CN application must be approved by the Commission before the proposed Project can be sited or constructed.

Minnesota Statutes and Rules set forth a number of factors that an Applicant must meet before the Commission can approve a CN. In an attempt to clarify its analysis, the Department addresses much of the applicable statutes and rules into five categories as discussed below.⁵

The Environmental Report (ER) is prepared by the Department-EERA and analyzes the effects of the proposed Project, and the alternatives, upon the natural and socioeconomic environments. The Department recommends that the Commission consider the ER in making its determination.

A. NEED ANALYSIS

Minnesota Rules 7849.0120A requires the Commission to determine "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." The rule then lists five specific considerations. The Department addresses each consideration separately .

1. Accuracy of the Forecast

i. Background

Minnesota Rules 7849.0120 A(1) states that, in assessing need, the Commission shall evaluate "the accuracy of the applicant's forecast of demand for the type of energy that would be supplied by the proposed facility."⁶ The Commission's September 23, 2021 *Order Granting Certificate of Need and Issuing Site Permit and Route Permit* (Plum Creek Order) in Docket Nos. IP6697/CN-18-699, IP6697/WS-18-700, and IP6697/TL-18-701 clarified this criterion:

Plum Creek did not use data from a PPA [power purchase agreement], IRP [integrated resource plan], or biennial transmission project report to demonstrate demand for the Project. However, under Minnesota statute and rules, there is no requirement that Plum Creek present a PPA, IRP,

⁵ Need Analysis, Alternative Analysis, Socioeconomic Analysis, Other Permits, and Policy Analysis.

⁶ Note that Minnesota Statutes § 216B.243 subd. 3(1) requires the Commission to evaluate the accuracy of the long-range energy demand forecasts on which the necessity for the facility is based.

biennial transmission project report, or any other specific data to demonstrate demand. The Legislature contemplated that independent power producers would construct such projects and did not require them to enter into power purchase agreements before obtaining a certificate of need. Rather, the Commission may evaluate demand using any data it finds persuasive, on a case-by-case basis. Furthermore, because Plum Creek is an independent power producer and not a utility, the Commission granted it certain variances to provide alternative data when more appropriate, and the data provided is sufficient to demonstrate demand.

In this case, Plum Creek showed that utilities and commercial and industrial customers have reported strong clean energy goals above and beyond RES [Renewable Energy Standard] requirements, and additional renewable energy sources will be needed to meet that demand. Furthermore, utilities plan to retire coal-based generating units across the region in the coming years, and renewable energy sources are expected to fill some of the resulting capacity needs. These established goals and plans are strong evidence of a utility's intention for future energy development and can be used to demonstrate demand, especially when consistent with stated public policy goals. Citation omitted.

The Department considered this guidance in formulating the analysis of the Applicants' forecast of demand for the type of energy that would be supplied.

ii. MISO's Analysis

In developing the proposed Project, MISO used three 'Futures'. The Futures are explained by MISO in the *MISO Futures Report* (Futures Report), provided in Appendix E-3 of the Petition, as follows:

Assumptions within the three Future scenarios vary to encompass reasonable bookends of the MISO footprint over the next twenty years. Future 1 represents a scenario driven by state and members' plans, with demand and energy growth driven by existing economic factors. Future 2 builds upon Future 1 by fully incorporating state and members' plans and includes a significant increase in load driven by electrification (discussed in the Electrification section of this report). In the final scenario analyzed, Future 3 advances from Future 2, evaluating the effects of large load increases due to electrification, 50% penetration of wind and solar, and an 80% carbon reduction across the footprint by 2039.

The Futures Report describes the forecasts for the three Futures as follows:

Future 1 assumed a load growth⁹ consistent with recent trends; 0.48%, including currently low electric vehicle adoption as modeled by Lawrence Berkeley National Laboratory's (LBNL) 'Low' scenario projection.

Future 2 assumed an annual energy growth⁹ rate of 1.09% to reach a targeted 30% energy increase by 2040, largely driven by electrification.

Future 3 assumed an annual energy growth⁹ rate of 1.71% to reach a targeted 50% energy increase by 2040, driven by additional electrification.

⁹ Net annual energy and demand growth rates result from reducing the hourly load shape by the energy from energy efficiency (EE) programs.

For specific growth rates, the Futures Report at Figures 12 and 13 shows that MISO used different growth rates for energy and demand, before energy efficiency selected by MISO's resource planning model, as follows:

- Future 1: 0.63 percent compound annual growth rate (CAGR) for energy, 0.75 percent CAGR for demand;
- Future 2: 1.22 percent CAGR for energy, 1.11 percent CAGR for demand; and
- Future 2: 1.91 percent CAGR for energy, 1.60 percent CAGR for demand.

The Futures Report at Figure 21 shows that the growth rates used in the three Futures for energy and demand, after energy efficiency selected by MISO's resource planning model, are as follows:

- Future 1: 0.48 percent CAGR for energy, 0.60 percent CAGR for demand;
- Future 2: 1.09 percent CAGR for energy, 0.97 percent CAGR for demand; and
- Future 2: 1.71 percent CAGR for energy, 1.41 percent CAGR for demand.

MISO used high and low forecasts, not just the base forecast, when analyzing the proposed Project and the alternatives. Appendix E-1 of the Petition contains MISO's *MTEP21 Report Addendum: Long Range Transmission Planning Tranche 1 Executive Summary, Report, and Appendix A* (LRTP Report). The LRTP Report at Table 5-1 shows the load parameters for seven models used by MISO in developing the LRTP portfolio of projects:

- models 1 and 2 use a high forecast (90th percentile summer day/night peak);⁷
- models 3 and 4 use a low forecast (50 to 70 percent of summer day/night peak);
- model 5 uses a moderate forecast (70 to 80 percent of the summer day peak); and
- models 6 and 7 use a high forecast (90th percentile winter day/night peak).

⁷ The standard forecast is based upon the 50th percentile. Thus, using the 90th percentile is using a forecast far above the standard forecast.

The rationale for the proposed project is described in the LRTP Report:

The Eastern Dakotas and Western/Central Minnesota 230 kV system is heavily constrained for many different seasons through the year. This 230 kV system has been playing a key role in transporting energy across a large geographical area as generation is needing to be transported out of the Dakotas and into Minnesota. Under shoulder load levels and high renewable output, this energy has a bias towards the Southeast into the Twin Cities load center. During peak load, particularly in Winter, this system is a key link for serving load in central and northern Minnesota. The 230 kV system is at capacity and shows many reliability concerns not only for N-1 outages in Future 1, but also for system intact situations. The 345 kV lines in the area provide additional outlets for the Dakotas by tying two existing 345 kV systems together. These lines unload the 230 kV system of concern and improve reliability across the greater Eastern Dakotas and Minnesota.

Thus, the transmission needs addressed by the proposed Project are not necessarily related to a summer peak demand. Instead, the rationale revolves around shoulder and winter peak load levels combined with renewable energy output. The use of several different load levels lessens the importance of the base case forecast. Instead—similar to resource planning—it is performance over the range that is of importance.

The need case also discusses the importance of the quantity of generation. To forecast the future generation fleet MISO uses a fairly complicated process. However, the results are summarized in Figures 44, 54, and 64 of the Futures Report. The changes to the generation fleet can be summarized as follows:

- Future 1: For LRZ1—25.1 GW added, 15.2 GW retired, net increase 10.0 GW.
- Future 1: For MISO—120.8 GW added, 77.1 GW retired, net increase 43.7 GW.
- Future 2: For LRZ1—40.0 GW added, 15.5 GW retired, net increase 24.5 GW.
- Future 2: For MISO—170.3 GW added, 80.4 GW retired, net increase 90.0 GW.
- Future 3: For LRZ1—65.0 GW added, 16.3 GW retired, net increase 48.7 GW.
- Future 2: For MISO—305.9 GW added, 112.3 GW retired, net increase 193.3 GW.

iii. Department Forecast Analysis

The Department analyzed the Applicants' demand and energy forecasts in several ways. First, the Department calculated the CAGR from 2023 to 2037 for both the summer peak demand and annual energy forecasts filed by Xcel, GRE, MP and OTP in Docket No. E999/PR-23-11. Note that MRES, on behalf of WMMPA, did not file a complete report and thus is excluded from the analysis. The CAGRs for each utility were then weighted by the forecasted 2023 energy and demand to calculate weighted average CAGR for energy and demand for the Applicants as a whole.

The Applicants' weighted average CAGR for energy is 0.46 percent, which is approximately equal to the MISO Future 1 CAGR. The Applicants' weighted average CAGR for peak demand is 0.41 percent, which is lower than the MISO Future 1 CAGR for peak demand.

Second, the Department reviewed the Commission's orders in the Applicants' most recently resource plan, as of the date the analysis was performed, for forecast-related information.

In GRE's most recent IRP the Commission's order states: "The Commission finds the Department's analysis of GRE's forecast is reasonable."⁸ In turn, the Department's September 8, 2017 comments on GRE's forecasting concluded that "that GRE's energy and demand forecasts are reasonable."⁹ Note that GRE has substantially changed forecasting methods since the 2017 IRP.

In MP's most recent IRP the Commission's order did not discuss the forecast in a meaningful way.¹⁰

In MRES's most recent IRP the Commission's order agreed with and adopted the recommendations of the Department.¹¹ In turn, the Department had no recommendations regarding MRES's forecast.¹²

In OTP's most recent IRP the Commission's order stated that by the time the Commission met to consider the matter, no party objected to use of Otter Tail's demand and energy forecasts and concluded that "The Commission finds that the Company's demand and net energy forecasts are acceptable for planning purposes."¹³

In Xcel's most recent IRP the Commission's order expressed concern that the impacts of electrification were not adequately incorporated into Xcel's forecasts.¹⁴ This indicates a concern that Xcel's forecasts are too low.

In summary, this review did not reveal any substantial forecasting issues, other than a concern that Xcel's demand and energy forecasts may be too low.

⁸ See the Commission's November 28, 2018 *Order Accepting 2018 – 2032 Resource Plan and Setting Future Filing Requirements* in Docket No. ET2/RP-17-286, [201811-148088-01](#) Note that GRE has since filed a new IRP; see Docket No. ET2/RP-22-75.

⁹ See [20179-135368-02](#)

¹⁰ See the Commission's January 9, 2023 *Order Approving Plan and Setting Additional Requirements* in Docket No. E015/RP-21-33, [20231-191970-01](#)

¹¹ See the Commission's February 15, 2022 *Order* in Docket No. ET10/RP-21-414, [20222-182786-01](#)

¹² See the Department's November 1, 2021 comments as attached to the Commission's February 15, 2022 *Order* in Docket No. ET10/RP-21-414, [20222-182786-01](#)

¹³ See the Commission's April 26, 2017 *Order Approving Plan with Modifications and Setting Requirements for Next Resource Plan* in Docket No. E017/RP-16-386, [20174-131288-01](#) Note that OTP has since filed a new IRP; see Docket No. E017/RP-21-339.

¹⁴ See the Commission's April 15, 2022 *Order Approving Plan with Modifications and Establishing Requirements for Future Filings* in Docket No. E002/RP-19-368, [20224-184828-01](#)

Third, to analyze the generation forecast the Department reviewed the expansion plans from the Applicants' most recent IRPs. In GRE's most recent IRP the Commission's order accepted GRE's 2018-2032 resource plan."¹⁵ The Commission's order noted that GRE's preferred plan included one GW of new supply-side resources.

In MP's most recent IRP the Commission's order required 600 to 700 MW of supply-side additions as part of the five-year action plan. The Order did not require any particular supply-side additions beyond five years.¹⁶

In MRES's most recent IRP the Commission's order agreed with and adopted the recommendations of the Department.¹⁷ In turn, the Department showed MRES's plan to contain 200 MW of supply-side additions in MISO.¹⁸

In OTP's most recent IRP the Commission's order approved a five-year action plan containing 550 to 650 MW of supply-side additions.¹⁹

Table 4-8 of the Petition shows that Xcel's IRP adds 16.6 GW of resources by 2040.

Overall, the Commission's most recent IRP orders require or accept additions of at least 18 GW; note that many of the orders did not address additions beyond five years and thus the actual required additions will be larger. In summary, it is reasonable to conclude that the Applicants' additions alone will approach the 25.1 GW of additions for all of LRZ1 under MISO Future 1.

Overall, the Department concludes that the MISO Futures reasonably encompass the future demand and energy requirements of the Applicants' customers. Also, the Department concludes that the MISO Futures reasonably encompass the future generation additions necessary to serve the Applicants' customers.

¹⁵ See the Commission's November 28, 2018 *Order Accepting 2018 – 2032 Resource Plan and Setting Future Filing Requirements* in Docket No. ET2/RP-17-286, [201811-148088-01](#)

¹⁶ See the Commission's January 9, 2023 *Order Approving Plan and Setting Additional Requirements* in Docket No. E015/RP-21-33, [20231-191970-01](#)

¹⁷ See the Commission's February 15, 2022 *Order* in Docket No. ET10/RP-21-414, [20222-182786-01](#)

¹⁸ See the Department's November 1, 2021 comments as attached to the Commission's February 15, 2022 *Order* in Docket No. ET10/RP-21-414, [20222-182786-01](#)

¹⁹ See the Commission's April 26, 2017 *Order Approving Plan with Modifications and Setting Requirements for Next Resource Plan* in Docket No. E017/RP-16-386, [20174-131288-01](#)

2. *Conservation Impacts*

Minnesota Rules 7849.0120 A (2) states that the Commission must consider “the effects of the applicant's existing or expected conservation programs and state and federal conservation programs.”²⁰

First, the Petition at Appendix F states:

The Project is needed to provide additional transmission capacity, to mitigate current capacity issues, and to improve electric system reliability throughout the region as more renewable energy resources are added to the electric system in and around the region. Given that the need for this Project is not driven by increases in peak demand ...

Thus, the impact of energy efficiency (EE) programs on the peak demand forecast is of lesser importance since peak demand is not necessarily the issue to be addressed.

Second, the Petition at Appendix F describes MISO’s process for developing the LRTP portfolio of projects. Briefly, a certain amount of EE is built into the forecast. In addition to that EE level, MISO studied the technical potential for EE, created packages of EE programs, and input the EE packages into MISO’s resource planning model (EGEAS). Then EGEAS was run to determine the amount of supply-side and demand-side resources that would be added under each of the Futures. The LRTP projects were then designed in transmission models with the EGEAS-determined amount of supply-side units built into them. Thus, the MISO process already included the effects of expected EE (built into the forecasts) and new EE (as expansion units) programs.

The Department concludes that the analytical process included the effects of the Applicant's existing or expected conservation programs as well as conservation programs across the MISO footprint.

²⁰ Note that Minnesota Statutes § 216B.243 subd. 3 states that “No proposed large energy facility shall be certified for construction unless the applicant can show that demand for electricity cannot be met more cost effectively through energy conservation and load-management measures...”

Minnesota Statutes § 216B.243 subd. 3(2) requires the Commission to evaluate the “effect of existing or possible energy conservation programs under sections 216C.05 to 216C.30 and this section or other federal or state legislation on long-term energy demand.”

Minnesota Statutes § 216B.243 subd. 3(6) requires the Commission to evaluate “possible alternatives for satisfying the energy demand or transmission needs including but not limited to potential for increased efficiency and upgrading of existing energy generation and transmission facilities, load-management programs, and distributed generation.”

Minnesota Statutes § 216B.243 subd. 3(8) requires the Commission to evaluate “any feasible combination of energy conservation improvements, required under section 216B.241, that can (i) replace part or all of the energy to be provided by the proposed facility, and (ii) compete with it economically.”

3. *Promotional Practices*

Minnesota Rules 7849.0120 A (3) states that the Commission must consider “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.”²¹

Regarding this criterion, the Petition states that:

The Applicants have not conducted any promotional activities or events that have triggered the need for the Project. As discussed above, the Project is needed to address regional reliability issues across MISO’s Midwest subregion.

The Department agrees with this assessment and further notes that the need is driven by the assumed retirement of existing fossil fuel baseload units and the addition of new, renewable generation:

the electric system is undergoing a transition as aging fossil-fueled baseload generation is retired and new renewable generation is being added to the system. This additional renewable generation is placing additional strain on the already constrained 230 kV transmission system in this area. The Project alleviates these constraints by providing additional capacity and additional outlet for the generation from North Dakota and South Dakota into and through Minnesota.

The Department concludes that promotional practices of the Applicants have not created the reliability issues to be addressed by the proposed Project.

4. *Non-CN Facilities Analysis*

Minnesota Rules 7849.0120 A (4) states that the Commission is to consider “the ability of current facilities and planned facilities not requiring certificates of need to meet the future demand.”²²

MISO’s model development practice is to include in MISO’s transmission models all existing facilities and all projects that have been approved by MISO. Therefore, “the ability of current facilities and planned facilities not requiring certificates of need to meet the future demand” has been considered since all current facilities would be in MISO’s transmission models and all planned facilities that have been approved by MISO would also be included in MISO’s transmission models.

²¹ Note that Minnesota Statutes § 216B.243 subd. 3(4) requires the Commission to evaluate promotional activities that may have given rise to the demand for this facility.

²² Note that Minnesota Statutes § 216B.243 subd. 3(6) requires the Commission to evaluate alternatives for satisfying the energy demand or transmission needs including but not limited to upgrading of existing energy generation and transmission facilities and distributed generation.

The Department concludes that current facilities and planned facilities not requiring certificates of need have been considered and will not be able to meet the future demand.

5. *Efficient Use of Resources*

Minnesota Rules 7849.0120 A (5) states that the Commission is to consider “the effect of the proposed facility, or a suitable modification thereof, in making efficient use of resources.”

First, according to the Petition, the Applicants propose a route that would be double-circuited with an existing 345 kV transmission line for over 90 percent of its length. This allows the Applicants to make efficient use existing corridors.

Second, Table 4-17 of the Petition shows that the proposed Project would reduce demand losses by 80.75 MW on average. As shown in Table 4-16 of the Petition, losses will change over time, based upon various conditions. The petition in Docket No. E015, ET2/CN-22-416²³ discusses how to translate peak demand losses into energy losses as follows:

Because losses change over time, there is no precise method to calculate average annual loss reductions. One common method is to use the loss savings at peak demand to estimate the average annual loss savings based on the following formula:

$$\begin{aligned} \text{Loss Factor} &= (0.3 \times \text{Load Factor}) + (0.7 \times \text{Load Factor}^2) \\ \text{Annual Loss Savings (MWh)} &= (\text{Loss Factor} \times \text{Peak Loss Savings}) \times 8760 \\ &\quad \text{hours/year} \end{aligned}$$

Assuming a load factor of 55 percent and using the calculated loss savings at peak demand...

Using the same formula in this proceeding and the 80.75 MW in peak demand loss savings translates into 267,327 MWh annually in energy savings. This reduction in demand and energy losses allows the Applicants to make more efficient use existing generation resources.

The Department concludes that the proposed facility will make efficient use of resources.

6. *Department Conclusion*

Based upon the above analysis the Department concludes that the probable result of denial would be an adverse effect upon the future adequacy, reliability, or efficiency of energy supply to the Applicants, to the Applicants’ customers, and to the people of Minnesota and neighboring states.

²³ See GRE and MP’s August 4, 2023 *Combined Certificate of Need and Route Permit Application for the Northland Reliability Project* in Docket No. E015, ET2/CN-22-416, [20238-198009-03](#)

B. ALTERNATIVES ANALYSIS

Minnesota Rules 7849.0120 B requires the Commission to determine “a more reasonable and prudent alternative to the proposed facility has not been demonstrated by a preponderance of the evidence on the record.” The rule then lists four specific considerations. The Department addresses each consideration separately below.

1. Size, Type, and Timing

Minnesota Rules 7849.0120 B (1) states that the Commission must consider “the appropriateness of the size, the type, and the timing of the proposed facility compared to those of reasonable alternatives.”

i. Size

Regarding size, the Department discussed the definition of size (as well as type and timing) in the context of transmission in the Department’s January 28, 2013 comments in Docket No. ET6675/CN-11-826. In that proceeding, the Department defined “size” as referring to “the quantity of power transfers that the transmission infrastructure improvement enables.” The Department maintains this interpretation.

Table 5-1 of the Petition shows a comparison of capacity by voltage level, assuming the same current of 3,000 Amps. A single circuit, 345 kV line has a capacity of 1,792.7 MVA. Adding a second circuit to an existing 345 kV line also adds an incremental 1,792.7 MVA of capacity. In comparison, a 230 kV line has a capacity of 1,195.1 MVA. The capacity of a 345 kV line is substantially higher than that of a 230 kV line. However, the Applicants explain that the overall goal of the project is to unload the current 230 kV network.²⁴ Using a voltage equal to or lower than 230 kV simply would not meet the need. Therefore, the Department concludes that the size of the proposed Project is not excessive and therefore is reasonable.

The goal of the proposed Project is to improve reliability. As discussed above, the Applicants’ Petition considered several alternatives such as generation, demand-side management, different voltages, non-CN alternatives, DC lines, and a no-build alternative. Based upon review of the Petition the Department concludes that generation alternatives are not reasonable. Transmission congestion is a need that the proposed Project is designed to address. The Department agrees with the Applicants that transmission congestion generally occurs when there is not enough transmission capacity to support all generation output at a particular time. Thus, regardless of the type of the generation facility evaluated, “construction of additional generation facilities is not a feasible and prudent alternative to the Project because such generation would: (1) further exacerbate the congestion already present on the system;

²⁴ For example, see pages 66 and 91 of the Petition; see [20239-199284-02](#).

(2) result in underutilization of existing generation resources; and (3) likely be more costly than the proposed Project.”

ii. Type

As noted above, the Department discussed the definition of type in the context of transmission lines in the Department’s January 28, 2013 comments in Docket No. ET6675/CN-11-826. In that proceeding, the Department interpreted “type” as referring to “the transformer nominal voltages, rated capacity, surge impedance loading (SIL), and nature (AC or DC) of power transported.” The Department maintains this interpretation.

Regarding nominal voltages, 345 kV is the standard high voltage used in Minnesota for long-distance transfer projects. Over the past two decades several 345 kV projects have been approved by the Commission and constructed.²⁵ The only exceptions to the use of 345 kV for long-distance transfer are two 500 kV lines connection Minnesota to Manitoba. The Petition discusses 500 kV alternatives as follows:

For comparison, a single-circuit 500 kV line would generally cost approximately \$4.1 million per mile and would require, at a minimum, a 500 kV/345 kV transformer at each substation connection at a cost of approximately \$20 million per transformer. In contrast, the indicative cost estimate for a double-circuit 345 kV line is approximately \$3.5 million per mile. Further, the majority of the Eastern Segment of the Project involves stringing an additional 345 kV circuit on the existing CapX2020 transmission line structures, which were constructed as 345/345 kV double-circuit capable...

A 500 kV or 765 kV transmission line would also require a wider right-of-way than the proposed 345 kV transmission line. A 500 kV or a 765 kV transmission line would require at least 200 feet of right-of-way while a 345 kV transmission line only requires 150 feet of right-of-way.

While it is clear that using any voltage other than 345 kV on the Eastern Segment is not warranted due to the existence of an open position on existing towers for a 345 kV line, the increased cost and right-of-way width on the Western Segment may be justified by other factors. Therefore, the Department concludes that an alternative using 345 kV on the Eastern Segment with 500 kV on the Western Segment is reasonable.

²⁵ For examples see Docket Nos. E002, ET6675/CN-17-184 for the Huntley –Wilmarth 345 kV Transmission Line Project; ET6675/CN-12-1053 for the Minnesota-Iowa 345 kV Transmission Line Project; E002, ET2/CN-06-1115 for the CapX 345-kV Transmission Projects; and E002/CN-01-1958 for Four Large High Voltage Transmission Line Projects in Southwestern Minnesota.

Regarding the nature of power transported, alternating current (AC) is to be used for the proposed Project. The Petition states the following about the advantages of AC over high voltage direct current (HVDC) in this case:

An HVDC transmission line is generally employed to deliver generation over a considerable distance, more than 300 miles, to a load center. HVDC systems typically do not allow for cost-effective interconnections along the line ...

HVDC lines also require expensive converter stations at each end point of the line to convert power from AC to DC and DC to AC ...

Converter stations for 500 to 600 kV HVDC lines can range from approximately \$400 million to \$500 million.

Based upon the converter station cost, the Department agrees with the Applicants' conclusion that AC is preferable to HVDC in this case.

In summary, the Department concludes that the Applicants' proposed type is reasonable.

iii. Timing

As noted above, the Department discussed the definition of timing in the context of transmission lines in the Department's January 28, 2013 comments in Docket No. ET6675/CN-11-826. In that proceeding, the Department interpreted "timing" as referring to "the on-line date for the transmission infrastructure improvements." The Department maintains this interpretation.

The in-service dates are summarized in Table 1 below.

Table 1: In-service Date Estimates

Segment	In-service Date
Eastern	Fourth Quarter 2027
Western	Fourth Quarter 2030/ Fourth Quarter 2031

The Petition also notes that the MISO-approved in-service date is June 1, 2030. The overall need is to unload the existing 230 kV system. In essence, the sooner the need can be addressed then better.

The Department concludes that the Applicants' proposed timing is reasonable.

iv. Size, Type, and Timing Summary

Overall, the Department agrees with the Applicants that the size, the type, and the timing of the proposed Project is reasonable when compared to those of the available alternatives. However, the Department also concludes that an alternative using 345 kV on the Eastern Segment with 500 kV on the Western Segment is reasonable.

2. Cost Analysis

Minnesota Rules 7849.0120 B (2) states that the Commission is to consider “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.”

The main alternative that could address the claimed need is a 500 kV single-circuit line along the Western Segment with the Eastern Segment as proposed. The Department Information Request No. 6 requested the Applicants provide a cost comparison between the proposed Project and an alternative consisting of a single-circuit 500 kV line on the Western Segment (Big Stone South to Alexandria), leaving the Eastern Segment as proposed.

The Applicants response stated that, assuming a distance of 100 miles for the Western Segment, the incremental capital cost of the 500 kV alternative would be \$60 million. In addition, the 500 kV alternative would require transformers at both ends of the Western Segment line. The additional transformers add about \$40 million in capital cost (excluding the costs associated with expanding the substations). Thus, the total incremental capital cost would be about \$100 million.

In addition to the incremental capital expense, the 500 kV alternative would have higher on-going maintenance and spare equipment cost. Specifically, the alternative would require OTP and WMMPA “to introduce new 500 kV class transformers and other associated 500 kV line and substation equipment that Otter Tail and Western Minnesota do not currently own, operate or maintain.”

Finally, the Applicants noted that the cost for generators to interconnect to a 500 kV line are significantly higher than interconnecting to a 345 kV line.

Overall, the Department agrees with the Applicants analysis that the 500 kV alternative has a substantially higher cost.

3. Natural and Socioeconomic Environments Analysis

Minnesota Rules 7849.0120 B (3) states that the Commission is to consider “the effects of the proposed facility upon the natural and socioeconomic environments compared to the effects of reasonable alternatives.”

Again, the main alternative that could address the claimed need is a 500 kV single-circuit line along the Western Segment with the Eastern Segment as proposed. Department Information Request No. 5 requested the Applicants provide a comparison of the effects upon the natural and socioeconomic environments between the proposed Project and an alternative consisting of a single-circuit 500 kV line on the Western Segment (Big Stone South to Alexandria), leaving the Eastern Segment as proposed. See Attachment 2 for the Applicants’ full response. Table 2 shows the Applicants summary of the impacts.

Table 2: Comparison of Impact on Natural and Socioeconomic Environments²⁶

Natural and Socioeconomic Environment Factor	345 kV	500 kV
Aesthetics	Lower	Higher
Agricultural Lands	Lower	Higher
Airports / Airstrips	Higher	Lower
Cultural Resources	Lower	Higher
Endangered/Threatened & Protected Species	Lower	Higher
Migratory Birds	Higher	Lower
Water Resources	Lower	Higher
Socioeconomic	Lower	Higher

Overall, the Department agrees with the Applicants that the proposed Project generally has a lesser impact in most factors, but the overall impact will depend upon the specific importance given to the various factors and the potential for mitigation to be implemented.

4. Reliability Analysis

Minnesota Rules 7849.0120 B (4) states that the Commission is to consider “the expected reliability of the proposed facility compared to the expected reliability of reasonable alternatives.”

Again, the main alternative that could address the claimed need is a 500 kV single-circuit line along the Western Segment with the Eastern Segment as proposed. Department Information Request No.4 requested the Applicants provide a comparison of the expected reliability of the proposed project to the expected reliability of an alternative consisting of a single-circuit 500 kV line on the Western Segment (Big Stone South to Alexandria), leaving the Eastern Segment as proposed.

The Applicants clarified that their response was based on engineering judgment without underlying transmission planning analysis having been performed. First, the Applicants noted that a 500 kV line has a higher capacity, in terms of MVA, than the proposed single circuit, 345 kV line but the capacity of the overall system must be considered rather than the capacity of an individual line. That means that

²⁶ See the Applicants response to Department Information Request No. 5 in Attachment 2.

“the reliability benefits of constructing the Western Segment at 500 kV are likely to be limited by the ability of the underlying transmission system to accommodate power transfers when other high voltage transmission facilities experience an outage.” In other words, a greater amount of under-build would be necessary for the reliability benefits of a 500 kV line to be realized.

Second, the Applicants state that, to maintain reliability, redundant transformers may be needed. The redundant transformers would increase the costs of the 500 kV alternative.²⁷

Third, the Applicants pointed out that “constructing the Western Segment as a single circuit 500 kV line also requires consideration of new contingencies (e.g., outages) in system assessments needed for NERC compliance that would not otherwise be possible if the Western Segment is constructed at 345 kV.”^{28, 29}

The Applicants conclude that they have “determined through engineering judgment that constructing the Western Segment at 345 kV is the most efficient and cost-effective way to maximize reliability and economic benefits of this Project not only to Minnesota, but the entire MISO Midwest subregion.”³⁰

The Department agrees with the Applicants any increased reliability benefits 500 kV alternative would be speculative at best, potentially would require additional costs, and that constructing the Western Segment at 345 kV is the best way to obtain reliability benefits from the proposed Project.

5. *Department Conclusion*

Based upon the above analysis the Department concludes that a more reasonable and prudent alternative to the proposed facility is not demonstrated by a preponderance of the evidence in the record.

C. *PROTECTING THE NATURAL AND SOCIOECONOMIC ENVIRONMENTS*

Minnesota Rules 7849.0120 C requires the Commission to determine “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.” The rule then lists four specific considerations. The Department addresses each consideration separately below.

1. *Overall State Needs*

²⁷ The cost of redundant 500/345 kV transformer(s) was not included in the cost estimates discussed above for the 500 kV alternative.

²⁸ In contrast, through the LRTP Tranche 1 study process MISO validated the use of 345 kV for the Western Segment.

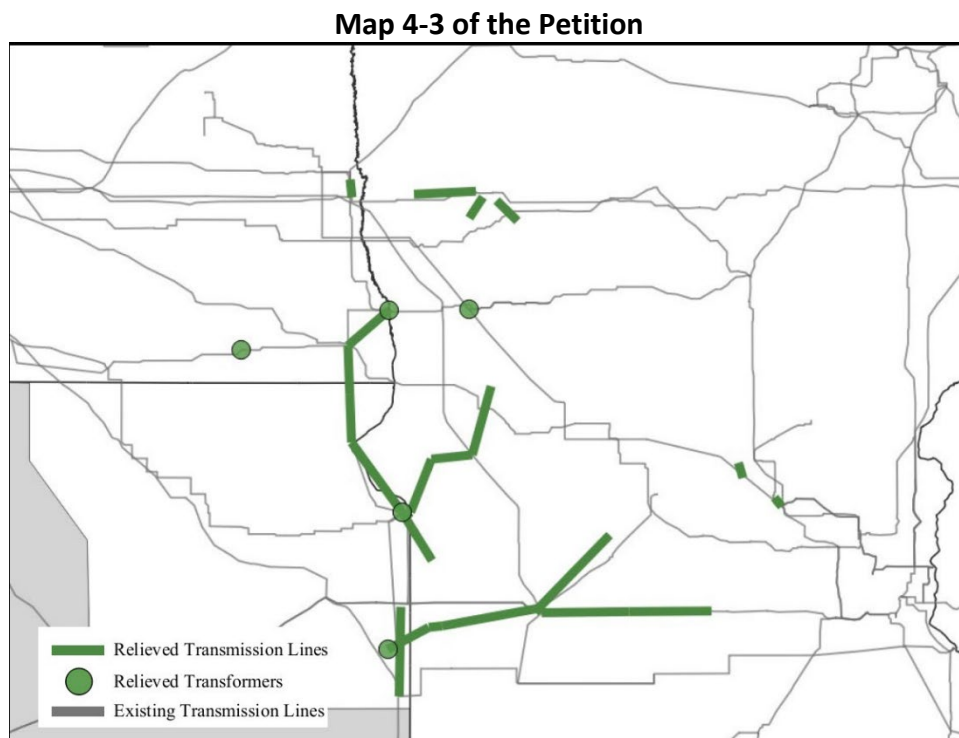
²⁹ See the Applicants’ response to Department Information Request No. 4 in Attachment 2.³⁰ See the Applicants’ response to Department Information Request No. 4 in Attachment 2.

³⁰ See the Applicants’ response to Department Information Request No. 4 in Attachment 2.

Minnesota Rules 7849.0120 C (1) states that the Commission shall evaluate “the relationship of the proposed facility, or a suitable modification thereof, to overall state energy needs.”³¹

First, the Department agrees with the Applicants that the proposed Project was designed by MISO as part of a package of projects (LRTP Tranche 1) to address reliability needs all across the MISO footprint. In addition, it is clear that the proposed Project will benefit state energy needs. In particular it will facilitate output from existing generation facilities, renewable and non-renewable, by addressing reliability issues known to be associated with power flows during certain conditions. Since wind and solar have zero marginal cost, this means that Minnesota’s overall energy needs will be more likely to be met by renewable energy.

Second, Map 4-3 of the Petition, provided below, shows the location of the reliability issues that MISO determined were addressed by the proposed Project. Map 4-3 shows that the thermal and voltage issues addressed are on transformers and transmission lines in western Minnesota and eastern North Dakota and South Dakota. Therefore, the proposed Project is an important part of meeting overall state energy needs in a reliable manner.



The Petition also discusses the CO₂ emissions reduction impact of the proposed Project by stating “Xcel Energy’s analysis estimated that the Project will reduce CO₂ emissions within MISO by 17.8 to 22.4

³¹ Note that Minnesota Statutes § 216B.243 subd. 3(3) requires the Commission to evaluate the relationship of the proposed facility to overall state energy needs.

million metric tons over the first 20 years that the Project is in service and by 36.1 to 49.6 million metric tons over the first 40 years that the Project is in service.” Therefore, the proposed Project clearly will contribute towards meeting the state’s goal to reduce statewide greenhouse gas emissions from the electricity sector.³²

In summary, the Department concludes that the proposed Project will have substantial benefits for meeting overall state energy needs in terms of enhanced regional reliability and lowering electricity sector emissions.

2. *Effects on Natural and Socioeconomic Environments*

Minnesota Rules 7849.0120 C (2) states that the Commission shall evaluate “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.”

The ER provides information related to the effects of the proposed facility upon the natural and socioeconomic environments compared to the effects of not building the facility. The Department recommends that the Commission consider the ER filed by Department-EERA in the Commission’s decision in this matter.

3. *Induced Development*

Minnesota Rules 7849.0120 C (2) states that, in assessing need, the Commission shall evaluate “the effects of the proposed facility, or a suitable modification thereof, in inducing future development.”

Induced development will be addressed in the ER and considered by the Commission when making a final determination regarding the proposed Project.

4. *Socially Beneficial Uses*

Minnesota Rules 7849.0120 C (4) states that, in assessing need, the Commission shall evaluate “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.”³³

Socially beneficial uses of the output will be addressed in the ER and considered by the Commission when making a final determination regarding the proposed Project.

³² See [Minnesota Statutes § 216H.02, subd. 1](#)

³³ Note that Minnesota Statutes § 216B.243 subd. 3(5) requires the Commission to evaluate benefits of this facility, including its uses to protect or enhance environmental quality, and to increase reliability of energy supply in Minnesota and the region.

D. OTHER PERMITS

Minnesota Rules 7849.0120 D requires the Commission to determine “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.”³⁴ This rule does not list any specific considerations.

Table 8-12 of the Petition lists numerous permits and approvals that may be required for the proposed Project. The Department reviewed the information on potentially required permits. Regarding the permits required by other agencies, the Department presumes that the various agencies will review and confirm that the Applicants are in compliance prior to granting their permits. The Department relies upon the agencies to enforce their requirements. Also, it is the Applicants responsibility ensure they have the necessary permits and approvals prior to constructing. Of course, should any necessary permits be denied, the proposed Project will not be constructed, regardless of the Commission’s decision regarding the Petition.

E. POLICY ANALYSIS

There are several remaining criteria in statutes and rules applicable to a CN that do not closely fit into the rule decision criteria discussed above. These criteria are grouped into a final category of policy considerations.

1. Robustness of the Transmission System

Minnesota Statutes § 216B.243, subd. 3 (9) states that the Commission shall evaluate “with respect to a high-voltage transmission line, the benefits of enhanced regional reliability, access, or deliverability to the extent these factors improve the robustness of the transmission system or lower costs for electric consumers in Minnesota.”

The MTEP Addendum at Table 6-1 indicates that, when combined with the Jamestown—Ellendale 345 kV line, 40 elements had thermal issues relieved under N-1 conditions and 70 under N-1-1 conditions.³⁵ The MTEP Addendum at Table 6-2 indicates that, when combined with the Jamestown—Ellendale 345 kV line, 97 elements had voltage issues relieved under N-1 conditions and 91 under N-1-1 conditions in the OTP area.³⁶

Table 4-5 of the Petition, reproduced below, provides reliability results based on the MISO MTEP22 transmission system model assuming no additional generation is added to the system. This analysis looked at the year 2027. Table 4-5 shows the number of thermal issues that are resolved with

³⁴ Note that Minnesota Statutes § 216B.243 subd. 3(7) requires the Commission to evaluate the policies, rules, and regulations of other state and federal agencies and local governments.

³⁵ See also Table 4-2 on page 68 of the Petition.

³⁶ See also Table 4-3 on page 68 of the Petition.

implementation of the proposed Project. The Department agrees with the Applicants assessment of Table 4-5 that major reliability benefits due to the proposed Project can be seen on the 345 kV system in southern Minnesota as well as the underlying 230 kV and 115 kV systems in western Minnesota and eastern North Dakota and South Dakota.

Table 4-5 of the Petition: Reliability Results

Totals	Overloaded Facility	Area	Contingency Type	MTEP22 Shoulder High Wind Overload Count				
				Base Model	L RTP 2	Tranche 1 Without L RTP 2	Tranche 1	Fixed By L RTP 2
	Blue Lake - Scott County 345 kV Ckt 1	MN South	N-1, N-1-1	8956	4503	7	0	4480
	Helena - Scott County 345 kV Ckt 1	MN South	N-1, N-1-1	5042	4508	13	0	559
	Wilmarth - Sheas Lake 345 kV Ckt 1	MN South	N-1, N-1-1	4453	2	0	0	4451
	Helena - Chub Lake 345 kV Ckt 1	MN South	N-1, N-1-1	4394	0	0	0	4394
	Big Stone - Highway 12 115 kV Ckt 1	SD	N-1, N-1-1	582	0	2	0	582
	Highway 12 - Ortonville 115 kV Ckt 1	SD, MN	N-1, N-1-1	301	0	1	0	301
	Helena - Sheas Lake 345 kV Ckt 1	MN South	N-1, N-1-1	270	2	0	0	268
	Ortonville - Ortonville Quarry 115 kV Ckt 1	MN West	N-1, N-1-1	259	0	0	0	259
	Morris - Grant County 115 kV Ckt 1	MN West	N-1, N-1-1	182	0	58	0	182
	Hoot Lake - Fergus Falls 115 kV Ckt 1	MN West	N-1, N-1-1	171	0	1	0	171
	Sheyenne - Lake Park 230 kV Ckt 1	ND	N-1, N-1-1	167	0	167	0	167
	Audubon - Lake Park 230 kV Ckt 1	MN West	N-1, N-1-1	167	0	167	0	167
	Inman - Wing River 230 kV Ckt 1	MN West	N-1, N-1-1	139	0	0	0	139
	Big Stone - Big Stone South 230 kV Ckt 2	SD	N-1, N-1-1	85	0	83	0	85
	Wahpeton - Fergus Falls 230 kV Ckt 1	MN West	N-1, N-1-1	83	0	0	0	83
	Southwest (MMU) - Southeast (MMU) 115 kV Ckt 1	MN SW	N-1, N-1-1	55	0	0	0	55
	Big Stone - Big Stone South 230 kV Ckt 1	SD	N-1, N-1-1	27	0	27	0	27
	Johnson Junction - Morris 115 kV Ckt 1	MN West	N-1	5	0	0	0	5

In addition to a near term model shown above., the Applicants also provide reliability results based on the MISO MTEP21 Future 1 (at year 20). The purpose of the analysis was to show improvements to system reliability related to the construction of the proposed Project in the future when additional generation is online. Information regarding thermal issues resolved by the Project is shown in Table 4-6 of the Petition. The Department agrees with the Applicants assessment of Table 4-6 that major reliability benefits of the Project can be seen on the 345 kV system in southern Minnesota as well as the underlying 230 kV and 115 kV systems in western Minnesota and eastern South Dakota.

In addition, the reliability improvements the proposed Project will create economic benefits which are summarized in Tables 4-9, 4-10, and 4-11 of the Petition which show 20-year and 40-year Adjusted Production Cost (APC) savings benefits. The economic benefits are shown in terms of adjusted production cost (APC) savings.³⁷ The specific amounts vary considerably by the scenario in question and the length studied (20 years versus 40 years). However, the smallest amount is \$650 million present value in a 20-year scenario.

In summary, the Department concludes that the proposed Project will provide benefits in terms of enhanced regional reliability and lowering costs for electric consumers in Minnesota.

³⁷ At page 76 the Petition explains APC savings: “These savings are calculated as the difference in total production costs of energy for a generation fleet adjusted for import costs and export revenues with and without the proposed transmission project.

2. *Renewable Preference*

There are two sections of Minnesota Statutes that provide a preference for renewable resources in resource planning and resource acquisition decisions. First, Minnesota Statutes §216B.243, subd. 3a³⁸ states that:

The Commission may not issue a certificate of need under this section for a large energy facility that generates electric power by means of a nonrenewable energy source, or that transmits electric power generated by means of a nonrenewable energy source, unless the applicant for the certificate has demonstrated to the Commission's satisfaction that it has explored the possibility of generating power by means of renewable energy sources and has demonstrated that the alternative selected is less expensive (including environmental costs) than power generated by a renewable energy source. For purposes of this Subdivision, "renewable energy source" includes hydro, wind, solar, and geothermal energy and the use of trees or other vegetation as fuel.

Second, Minnesota Statutes § 216B.2422, subd. 4 states that:

The Commission shall not approve a new or refurbished nonrenewable energy facility in an integrated resource plan or a certificate of need, pursuant to section 216B.243, nor shall the Commission allow rate recovery pursuant to section 216B.16 for such a nonrenewable energy facility, unless the utility has demonstrated that a renewable energy facility is not in the public interest.

The proposed Project is not intended to interconnect any particular generation resource. Moreover, the proposed Project is not needed to transmit power from a particular new generation resource. Rather, the proposed Project would transmit electricity on the existing high-voltage grid generally. Therefore, these renewable preference statutes do not apply.

In addition, the Petition states:

While continuing expansion of renewable energy generation is planned, there is currently not enough transmission capacity on the high-voltage transmission system to accommodate all the renewable energy projects that wish to interconnect. Further, congestion on the high voltage transmission system has been increasing in the past several years due to the increased amount of new generation being added without a sufficient amount of

³⁸ Note that Minnesota Statutes § 216B.243 subd. 3(11) also requires the Commission to evaluate whether an applicant has made the demonstrations required under this subdivision.

additional transmission capacity. This Project will play a key role in providing additional transmission capacity, mitigating current capacity issues, and improving electric system reliability throughout the region as more renewable energy resources are added to the high voltage transmission system in and around the region.

In general, the Department agrees with the Applicants' assessment. Thus, the Department concludes that renewable generation is not a reasonable alternative and this statutory criterion has been met.

3. *Distributed Generation Analysis*

Minnesota Statutes § 216B.2426 states that:

The Commission shall ensure that opportunities for the installation of distributed generation, as that term is defined in section 216B.169, Subdivision 1, paragraph (c), are considered in any proceeding under section 216B.2422, 216B.2425, or 216B.243.

Minnesota Statutes § 216B.169 states:

For the purposes of this section, the following terms have the meanings given them...(c) "High-efficiency, low-emission, distributed generation" means a distributed generation facility of no more than ten megawatts of interconnected capacity that is certified by the commissioner under Subdivision 3 as a high efficiency, low- emission facility.

Any distributed generation (DG) certified by the Commissioner of the Minnesota Department of Commerce (Commissioner) in the past would be reflected in the Applicants' and MISO's models used to analyze the project. Any DG certified by the Commissioner in the future and sited in the local area would impact the rate of local load growth the Applicants would need to serve. However, there is no reason to believe the impacts of Commissioner-certified DG would be significant. Therefore, the Department concludes that this statutory criterion has been met.

4. *Innovative Energy Project (IEP) Preference*

Minnesota Statutes § 216B.1694, subd. 2 (a) (4) states that an IEP:

... shall, prior to the approval by the commission of any arrangement to build or expand a fossil-fuel-fired generation facility, or to enter into an agreement to purchase capacity or energy from such a facility for a term exceeding five years, be considered as a supply option for the generation facility, and the commission shall ensure such consideration and take any action with respect to such supply proposal that it deems to be in the best interest of ratepayers.

This statute does not apply since the proposed facility in question is a transmission line rather than a generating facility.

5. *Renewable Energy Standard Compliance*

Minnesota Statutes § 216B.243, subd. 3 (10) states that the Commission shall evaluate “whether the applicant or applicants are in compliance with applicable provisions of sections 216B.1691 ...” In turn, Minnesota Statutes §216B.1691, subd. 2a (a) states that each electric utility shall provide retail customers in Minnesota the following percentages of total retail electric sales from energy generated by renewable energy technologies:

- 1) 2012 12 percent;
- 2) 2016 17 percent;
- 3) 2020 20 percent;
- 4) 2025 25 percent; and
- 5) 2035 55 percent.

In addition, Minnesota Statutes § 216B.1691 subd. 2f requires that public utilities such as MP, OTP, and Xcel generate or procure solar energy equal to at least 1.5 percent of Minnesota retail sales by the end of 2020. At least ten percent of the 1.5 percent goal must be generated by or procured from solar photovoltaic devices with a nameplate capacity of 40 kW or less. The solar energy standard (SES) statute (Minn. Stat. § 216B.1691, subd. 2(f)) excludes certain retail sales to iron mining, paper, and wood products manufacturers from the calculation of the SES requirement.

The Department reviews historical compliance with the RES statute in a biennial report to the legislature. The most recent report was the *Minnesota Renewable Energy Standard: Utility Compliance* (RES Report), filed January 12, 2023.³⁹ The RES Report concluded that “All of the utilities subject to the Minnesota Renewable Energy Standard have demonstrated compliance with the 2021 Renewable Energy Standard requirements.”

Jm/n

Regarding future compliance the Department note that Table 3 of the RES Report estimates the Applicants can comply in the future as follows:

- Xcel—2040;
- GRE—2040;
- MP—2050;
- OTP—2035; and
- MRES—2023.

³⁹ The report is available at: <https://www.lrl.mn.gov/docs/2023/mandated/230009.pdf>

Finally, regarding the SES, the RES Report at Table 2 showed that OTP met the overall SES and partially met the small-scale solar section of the SES in 2021 through the purchase and retirement of solar renewable energy credits (SRECS). The RES Report also indicates that OTP had a plan to meet the small-scale SES requirement going forward. Table 2 also showed that MP and Xcel met the overall SES and the small-scale solar section of the SES in 2021.

Overall, the Department concludes that this statutory criterion has been met.

6. *Environmental Cost Planning*

Minnesota Statutes § 216B.243, subd. 3 (12) states that the Commission shall evaluate “if the applicant is proposing a nonrenewable generating plant, the applicant's assessment of the risk of environmental costs and regulation on that proposed facility over the expected useful life of the plant, including a proposed means of allocating costs associated with that risk.”

Because the Applicants are proposing a transmission line, not a generating plant this statute does not apply.

7. *Statewide Power Sector Carbon Dioxide Emissions*

Minnesota Statutes § 216H.03, subd. 3 states that “Unless preempted by federal law, until a comprehensive and enforceable state law or rule pertaining to greenhouse gases that directly limits and substantially reduces, over time, statewide power sector carbon dioxide emissions is enacted and in effect, and except as allowed in Subdivisions 4 to 7, on and after August 1, 2009, no person shall construct within the state a new large energy facility that would contribute to statewide power sector carbon dioxide emissions.”

Note that Minnesota Statutes § 216H.03, subd. 3 has, as a precondition: “until a comprehensive and enforceable state law or rule pertaining to greenhouse gases that directly limits and substantially reduces, over time, statewide power sector carbon dioxide emissions is enacted and in effect...” With the passage of the state’s carbon free energy targets in Minnesota Statutes § 216B.1691 subd. 2g (Carbon-free standard)⁴⁰ the Commission has determined that this section is no longer applicable as the state has an enforceable law that limits statewide power sector carbon dioxide emissions.⁴¹

⁴⁰ Laws of Minnesota 2023, chapter 7; available at: <https://www.revisor.mn.gov/laws/2023/0/Session+Law/Chapter/7/>

⁴¹ For details of the Commission’s determination see point 3 of the Commission’s November 3, 2023 *Order Approving Petition and Requiring Compliance Filing* in Docket No. E002/CN-23-212; available at: [202311-200215-01](https://www.revisor.mn.gov/laws/2023/0/Session+Law/Chapter/7/)

8. *Local Job Impacts*

Minnesota Statutes § 216B.2422, subd. 4a states:

The commission must consider local job impacts and give preference to proposals that maximize the creation of construction employment opportunities for local workers, consistent with the public interest, when evaluating any utility proposal that involves the selection or construction of facilities used to generate or deliver energy to serve the utility's customers, including but not limited to an integrated resource plan, a certificate of need, a power purchase agreement, or commission approval of a new or refurbished electric generation facility. The commission must, to the maximum extent possible, prioritize the hiring of workers from communities hosting retiring electric generation facilities, including workers previously employed at the retiring facilities.

At this time there are no alternative proposals to consider, only the proposed Project. The Petition states that the workforce required for construction of the proposed Project is estimated to be about 100 to 150 construction workers. In addition, the Petition states "The Applicants will work with local communities to identify opportunities for further enhancing the socioeconomic benefits of the Project." Finally, at page 168 the Petition indicates that the workforce for inspections will consist of one to three workers for inspections every four years.

The Department concludes that the Applicants have adequately addressed this statutory requirement.

9. *Domestic Content Preference*

Minnesota Statutes § 216B.2422, subd. 4b states "The commission may give preference in resource selection to projects utilizing energy technologies produced domestically by entities who received an advanced manufacturing tax credit for those technologies under section 45X of the Internal Revenue Code, as allowed under the federal Inflation Reduction Act of 2022, Public Law 117-169."

Department Information Request No. 3 requested the Applicants provide a response to this requirement. The Applicants state:

section 45X of the Internal Revenue Code applies to the following technologies: photovoltaic cells, wind energy components, torque tubes, structural fasteners, photovoltaic wafers, solar grade polysilicon, polymeric backsheet, solar modules, inverters, electrode active materials, battery cells, battery modules, and applicable critical minerals. None of these materials will be used to construct the Project. That said, the Applicants intend to use domestic suppliers for the materials needed to construct the Project to the extent that domestic suppliers are able to provide the necessary materials on the timeline required to meet the Project's construction schedule.

See Attachment 2 for the Applicants' full response. The Department agrees with the Applicants' that section 45X of the Internal Revenue Code generally applies to generation projects rather than transmission projects. Therefore, the Department concludes that this statute does not apply.

10. Inflation Reduction Act Compliance

The Commission's September 12, 2023 *Order Setting Requirements Related to Inflation Reduction Act* in E,G999/CI-22-624 at point 1 states:

The utilities shall maximize the benefits of the Inflation Reduction Act in future resource acquisitions and requests for proposals in the planning phase, petitions for cost recovery through riders and rate cases, resource plans, gas resource plans, integrated distribution plans, and Natural Gas Innovation Act innovation plans. In such filings, utilities shall discuss how they plan to capture and maximize the benefits from the Act, and how the Act has impacted planning assumptions including (but not limited to) the predicted cost of assets and projects and the adoption rates of electric vehicles, distributed energy resources, and other electrification measures. Reporting shall continue until 2032.

Department Information Request No. 2 requested the Applicants provide a response to this requirement. The Applicants stated:

The Applicants have evaluated the Inflation Reduction Act for applicability to activities to be undertaken in the planning, procurement, and construction of the Project and, at this time, have not identified any opportunities for capturing benefits under the Inflation Reduction Act

See Attachment 2 for the Applicants' full response. With this information the Department concludes that the Applicants have adequately discussed how they plan to capture the benefits from the Inflation Reduction Act.

F. CONDITIONS

The Petition at section 2.3.3.1 explains that MISO has determined that the costs of the entire LRTP Tranche 1 portfolio, which includes the proposed Project, will be allocated to all transmission customers in the MISO Midwest Subregion.⁴² The allocation will result in all ratepayers in MISO Midwest Subregion paying the proposed Projects' annual revenue requirement based on actual monthly energy consumption. Based upon this allocation method the Petition estimates that Minnesota customers' share of the annual revenue requirement will be approximately 15 to 20 percent.

⁴² The MISO Midwest Subregion includes MISO Minnesota, Montana, North Dakota, South Dakota, Iowa, Wisconsin, Missouri, Illinois, Indiana, Michigan, and Kentucky.

This allocation process means that all Minnesota ratepayers whose utility is a MISO member (and not just the members/ratepayers of the Applicants) will pay for a share of the proposed Project's costs. The *2022 MISO Energy and Peak Demand Forecasting for System Planning* prepared for MISO by Purdue University's State Utility Forecasting Group, at Table 57, estimates that MISO accounts for about 98 percent of Minnesota MWh sales.⁴³ Therefore, it is important to protect Minnesota ratepayers' interests in this proceeding.

Utility cost estimates are used extensively in CN and other regulatory proceedings and provide a strong basis for the Commission to hold utilities accountable to the costs they represent for facilities, particularly since CNs consider alternatives to proposed projects. In its role to ensure that rates are reasonable, the Commission has generally not allowed approval of projects in CN proceedings to constitute a "blank check" for cost recovery in riders when actual costs are greater than the estimated costs the utilities represented in regulatory approval proceedings.⁴⁴

To implement ratepayer protections, the Department recommends the Commission require Xcel on behalf of the Applicants to provide a final number or cap amount within 60 days of the Commission's Order determining the route. In addition, the Department recommends the Commission condition approval of the proposed Project upon requiring MP, OTP, and Xcel:

- 1) provide a final number or cap amount within 60 days of the Commission's Order determining the route;
- 2) To wait until the first rate case after the proposed Project is placed in-service to recover any cost overruns from Minnesota ratepayers; and
- 3) justify fully the reasonableness of recovering any cost overruns of the proposed Project from Minnesota ratepayers. MP, OTP, and Xcel must justify any costs (including operations-and-management expense, ongoing capital expense—including revenue requirements related to capital included in rate base—insurance expense, land-lease expense, and property/production tax expense) that are higher than forecasted in this proceeding. MP, OTP, and Xcel bear the burden of proof in any future regulatory proceeding related to the recovery of costs above those forecasted in this proceeding.

The Department also recommends the Commission notify MP, OTP, and Xcel that ratepayers will not be put at risk for any assumed benefits that do not materialize.

These conditions mean that MP, OTP, and Xcel should be allowed to recover costs up to the level of the cost estimate the Commission approves for the proposed Project without further Commission action. MP, OTP, and Xcel have an incentive to set the cap as high as possible without putting the proposed Project in jeopardy, but other MISO members have an incentive to keep their transmission costs as low as possible. This conflict between MP, OTP, and Xcel and other MISO members should provide a check on the cost estimate.

⁴³ This report is available at:

<https://www.purdue.edu/discoverypark/sufg/docs/publications/MISO/MISO%20forecast%20report%202022.pdf>

⁴⁴ For a detailed discussion of this issue see the November 7, 2018 *Direct Testimony and Attachments of Mark A. Johnson* in Docket No. E002, ET6675/CN-17-184, available at: [201811-147664-02](https://www.purdue.edu/discoverypark/sufg/docs/publications/MISO/MISO%20forecast%20report%202022.pdf)

G. COMMISSION NOTICE

1. Contested Facts

The first topic open for comment is “are there any contested issues of fact with respect to the representations made in the certificate of need application?”

The Department does not have any contested issues of fact with respect to the Petition.

2. Grant the CN

The second topic open for comment is “should the Commission grant a certificate of need for the proposed project?”

Based upon the above analysis, should the Commission find, after consideration of the ER, that the proposed facility “will provide benefits to society in a manner compatible with protecting the natural and socioeconomic environments, including human health,” the Department recommends that the Commission issue a CN to the Applicants.

3. Other Issues

The third topic open for comment is “are there other issues or concerns related to this matter?”

The Department does not have any other issues or concerns.

IV. DEPARTMENT RECOMMENDATION

Based upon the above analysis the Department:

- Has not identified any contested issues with respect to the representations made in the Petition pertaining to the certificate of need, but relies on input from MISO studies and Department-EERA’s ER on some issues; and
- Concludes that the Petition has met the requirements of Minnesota Statutes, section 216B.243 and Minnesota Rules 7849.0010 to 7849.0400.
 - The Applicants have met each of the five criteria listed under Minnesota Rules 7849.0120 A and thus 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;”
 - The Applicants have met each of the four criteria listed under Minnesota Rules 7849.0120 B and thus shown that “a more reasonable and prudent alternative to the proposed facility has not been demonstrated by a preponderance of the evidence on the record;” and

- The Applicants have shown that “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” as required by Minnesota Rules 7849.0120 D.

Should the Commission find, after consideration of the ER, that the proposed facility “will provide benefits to society in a manner compatible with protecting the natural and socioeconomic environments, including human health,” the Department recommends that the Commission issue a CN to the Applicants.

The Department recommends the Commission condition approval of the proposed Project upon requiring Xcel on behalf of the Applicants to provide a final number or cap amount within 60 days of the Commission’s Order determining the route. In addition, the Department recommends the Commission condition approval of the proposed Project upon requiring MP, OTP, and Xcel:

- 1) provide a final number or cap amount within 60 days of the Commission’s Order determining the route;
- 2) To wait until the first rate case after the proposed Project is placed in-service to recover any cost overruns from Minnesota ratepayers; and
- 3) justify fully the reasonableness of recovering any cost overruns of the proposed Project from Minnesota ratepayers. MP, OTP, and Xcel must justify any costs (including operations-and-management expense, ongoing capital expense—including revenue requirements related to capital included in rate base—insurance expense, land-lease expense, and property/production tax expense) that are higher than forecasted in this proceeding. MP, OTP, and Xcel bear the burden of proof in any future regulatory proceeding related to the recovery of costs above those forecasted in this proceeding.

The Department also recommends the Commission notify MP, OTP, and Xcel that ratepayers will not be put at risk for any assumed benefits that do not materialize.

Regulatory Criteria	Where Addressed in Comments
Minn. R. 7849.0120, subpart A (1)	Section III, A, 1, Pages 4-10
Minn. R. 7849.0120, subpart A (2)	Section III, A, 2 Pages 10-11
Minn. R. 7849.0120, subpart A (3)	Section III, A, 3 Pages 11-12
Minn. R. 7849.0120, subpart A (4)	Section III, A, 4 Page 12
Minn. R. 7849.0120, subpart A (5)	Section III, A, 5 Page 13
Minn. R. 7849.0120, subpart B (1)	Section III, B, 1 Pages 14-17
Minn. R. 7849.0120, subpart B (2)	Section III, B, 2 Pages 17-18
Minn. R. 7849.0120, subpart B (3)	Section III, B, 3 Pages 18-19
Minn. R. 7849.0120, subpart B (4)	Section III, B, 4 Pages 19-20
Minn. R. 7849.0120, subpart C (1)	Section III, C, 1 Pages 20-21
Minn. R. 7849.0120, subpart C (2)	Section III, C, 2 Page 22
Minn. R. 7849.0120, subpart C (3)	Section III, C, 3 Page 22
Minn. R. 7849.0120, subpart C (4)	Section III, C, 4 Page 22
Minn. R. 7849.0120, subpart D	Section III, D Pages 22-23
Minn. Stat. § 216B.243, subd. 3(9)	Section III, E, 1 Pages 23-24
Minn. Stat. §§ 216B.243, subd. 3a and 216B.2422, subd. 4	Section III, E, 2 Pages 25-26
Minn. Stat. § 216B.2426	Section III, E, 3 Page 26
Minn. Stat. § 216B.1694, subd. 2(a)(4)	Section III, E, 4 Page 27
Minn. Stat. §§ 216B.243, subd. 3(10) and 216B.1691 subd. 2f	Section III, E, 5 Pages 27-28
Minn. Stat. § 216B.243 subd. 3(12)	Section III, E, 6 Page 28
Minn. Stat. § 216H.03	Section III, E, 7 Pages 28-29
Minn. Stat. § 216B.2422, subd. 4a	Section III, E, 8 Page 29
Minn. Stat. § 216B.2422, subd. 4b	Section III, E, 9 Pages 29-30
Commission Order in E,G999/CI-22-624	Section III, E, 10 Pages 30-31

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, E017, ET2, E015, ET10/CN-22-538

Dated this **30th** day of **April 2024**

/s/Sharon Ferguson

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Nick	Kaneski	nick.kaneski@enbridge.com	Enbridge Energy Company, Inc.	11 East Superior St Ste 125 Duluth, MN 55802	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Tom	Karas	tomskaras@gmail.com		3171 309th Ave NW Cambridge, MN 55008	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Bruce	King	Brenda@ranww.org	Realtors, Association of Northwestern WI	Suite 3 1903 Keith Street Eau Claire, WI 54701	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Ray	Kirsch	Raymond.Kirsch@state.mn.us	Department of Commerce	85 7th Place E Ste 500 St. Paul, MN 55101	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Chad	Konickson	chad.konickson@usace.army.mil	U.S.Army Corps of Engineers	180 5th St # 700 Saint Paul, MN 55101	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Stacy	Kotch Egstad	Stacy.Kotch@state.mn.us	MINNESOTA DEPARTMENT OF TRANSPORTATION	395 John Ireland Blvd. St. Paul, MN 55155	Electronic Service	No	OFF_SL_22-538_Official CC Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Michael	Krikava	mkrikava@taftlaw.com	Taft Stettinius & Hollister LLP	2200 IDS Center 80 S 8th St Minneapolis, MN 55402	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Nicolle	Kupser	nkupser@greatermngas.com	Greater Minnesota Gas, Inc. & Greater MN Transmission, LLC	1900 Cardinal Ln PO Box 798 Faribault, MN 55021	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Mike	Laroque	mike.laroque@whiteearthnsn.gov	White Earth Nation	PO Box 418 White Earth, MN 56591	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Robert L	Larsen	robert.larsen@lowersioux.com	Lower Sioux Indian Community	PO Box 308 39527 Reservation Highway 1 Morton, MN 56270	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Peder	Larson	plarson@larkinhoffman.com	Larkin Hoffman Daly & Lindgren, Ltd.	8300 Norman Center Drive Suite 1000 Bloomington, MN 55437	Electronic Service	No	OFF_SL_22-538_Official CC Service List
James D.	Larson	james.larson@avantenergy.com	Avant Energy Services	220 S 6th St Ste 1300 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Eric	Lipman	eric.lipman@state.mn.us	Office of Administrative Hearings	PO Box 64620 St. Paul, MN 551640620	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Jason	Loos	jason.loos@centerpointenergy.com	CenterPoint Energy Resources Corp.	505 Nicollet Mall 3rd Floor Minneapolis, MN 55402	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Susan	Ludwig	sludwig@mnpower.com	Minnesota Power	30 West Superior Street Duluth, MN 55802	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Vernelle	Lussier	vernelle.lussier@redlakenation.org	Red Lake Nation	15484 Migizi Drive Red Lake, MN 56671	Electronic Service	No	OFF_SL_22-538_Official CC Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Kavita	Maini	kmaini@wi.rr.com	KM Energy Consulting, LLC	961 N Lost Woods Rd Oconomowoc, WI 53066	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Dawn S	Marsh	dawn_marsh@fws.gov	U.S. Fish & Wildlife Service	Minnesota-Wisconsin Field Offices 4101 American Blvd E Bloomington, MN 55425	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Shena	Matrious	Shena.Matrious@millelacs band.com	Mille Lacs Band of Ojibwe	43408 Oodena Drive Onamia, MN 56349	Electronic Service	No	OFF_SL_22-538_Official CC Service List
April	McCormick	aprilm@grandportage.com	Grand Portage Band of Lake Superior Chippewa	PO Box 428 Grand Portage, MN 55605	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Megan	McKenzie	megan.mckenzie@state.m n.us	Office of Administrative Hearings	PO Box 64620 St Paul, MN 55164	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Valentina	Mgeni	Valentina.Mgeni@piic.org	Prairie Island Indian Community	Prairie Island Indian Community 5636 Sturgeon Lake Road Welch, MN 55089	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Cole W.	Miller	cole.miller@shakopeedakot a.org	Shakopee Mdewakanton Sioux Community	Shakopee Mdewakanton Sioux Community 2330 Sioux Trail NW Prior Lake, MN 55372	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Stacy	Miller	stacy.miller@minneapolis n.gov	City of Minneapolis	350 S. 5th Street Room M 301 Minneapolis, MN 55415	Electronic Service	No	OFF_SL_22-538_Official CC Service List
David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022093	Electronic Service	No	OFF_SL_22-538_Official CC Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Gary D.	Moody	gmoody@audubon.org	National Audubon Society	225 Varrick St., FL 7 New York, NY 10014	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP	33 South Sixth St Ste 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Travis	Morrison	travis.morrison@boisfortensn.gov	Bois Forte Band of Chippewa	Bois Forte Tribal Government 5344 Lakeshore Drive Nett Lake, MN 55772	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Robert	Moyer, Jr.	rmoyer@boisfortensn.gov	Bois Forte Band of Chippewa Tribal Government	5344 Lakeshore Drive Nett Lake, MN 55772	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Sonny	Myers	smyers@1854treatyauthority.org	1854 Treaty Authority	4428 Haines Rd Duluth, MN 55811-1524	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Dan	Nelson	Dan.Nelson@ISGinc.com	I&S Group	115 E Hickory St Ste 300 Mankato, MN 56001	Electronic Service	No	OFF_SL_22-538_Official CC Service List
David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency	220 South Sixth Street Suite 1300 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Samantha	Norris	samanthanorris@alliantenergy.com	Interstate Power and Light Company	200 1st Street SE PO Box 351 Cedar Rapids, IA 524060351	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Joseph	O'Brien	joey.obrien@lowersioux.com	Lower Sioux Indian Community	39527 Highway 1 Morton, MN 56270	Electronic Service	No	OFF_SL_22-538_Official CC Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Samantha J	Odegard	samanthao@uppersiouxcommunity-nsn.gov	Upper Sioux Tribal Community	PO Box 147 Granite Falls, MN 56241	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Matthew	Olsen	molsen@otpc.com	Otter Tail Power Company	215 South Cascade Street Fergus Falls, MN 56537	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Carol A.	Overland	overland@legalelectric.org	Legalelectric - Overland Law Office	1110 West Avenue Red Wing, MN 55066	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Greg	Palmer	gpalmer@greatermngas.com	Greater Minnesota Gas, Inc. & Greater MN Transmission, LLC	1900 Cardinal Ln PO Box 798 Faribault, MN 55021	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Priti	Patel	ppatel@greenergy.com	Great River Energy	12300 Elm Creek Blvd Maple Grove, MN 55369-4718	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Earl	Pendleton	earl.pendleton@lowersioux.com	Lower Sioux Indian Community	39527 Highway 1 Morton, MN 56270	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Kevin	Peterson	kjp@ibew160.org	IBEW Local 160	1109 Northway Lane NE Rochester, MN 55906	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Jennifer	Peterson	jjpeterson@mnpower.com	Minnesota Power	30 West Superior Street Duluth, MN 55802	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Catherine	Phillips	Catherine.Phillips@wecenergygroup.com	Minnesota Energy Resources	231 West Michigan St Milwaukee, WI 53203	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Angela	Piner	angela.piner@hdrinc.com	HDR, Inc.	Suite 600 701 Xenia Avenue South Suite 600 Minneapolis, MN 55416	Electronic Service	No	OFF_SL_22-538_Official CC Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Joe	Plumer	joe.plumer@redlakenation.org	Red Lake Nation	15484 Migizi Drive Red Lake, MN 56671	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Kevin	Pranis	kpranis@liunagro.com	Laborers' District Council of MN and ND	81 E Little Canada Road St. Paul, MN 55117	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Robert	Prescott	bob.prescott@lowersioux.com	Lower Sioux Indian Community	39527 Highway 1 Morton, MN 56270	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Larry	Rebman	larryemls@hotmail.com	EMLS, Inc	PO Box 122 Appleton, MN 56208	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Generic Notice	Regulatory	regulatory_filing_coordinators@otpco.com	Otter Tail Power Company	215 S. Cascade Street Fergus Falls, MN 56537	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_22-538_Official CC Service List
Kevin	Reuther	kreuther@mncenter.org	MN Center for Environmental Advocacy	26 E Exchange St, Ste 206 St. Paul, MN 551011667	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Margaret	Rheude	Margaret_Rheude@fws.gov	U.S. Fish and Wildlife Service	Twin Cities Ecological Services Field Office 4101 American Blvd. E. Bloomington, MN 55425	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Susan	Romans	sromans@allete.com	Minnesota Power	30 West Superior Street Legal Dept Duluth, MN 55802	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Stephan	Roos	stephan.roos@state.mn.us	MN Department of Agriculture	625 Robert St N Saint Paul, MN 55155-2538	Electronic Service	No	OFF_SL_22-538_Official CC Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Bill	Rudnicki	bill.rudnicki@shakopeedakota.org	Shakopee Mdewakanton Sioux Community	Shakopee Mdewakanton Sioux Community 2330 Sioux Trail NW Prior Lake, MN 55372	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Nathaniel	Runke	nrunke@local49.org	International Union of Operating Engineers Local 49	611 28th St. NW Rochester, MN 55901	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Miranda	Sam	Miranda.Sam@lowersioux.com	Lower Sioux Indian Community	39527 Reservation Highway 1 PO Box 308 Morton, MN 56270	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Adam	Savariego	adams@uppersiouxcommunity-nsn.gov	Upper Sioux Community	5722 Travers Lane PO Box 147 Granite Falls, MN 56241	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Elizabeth	Schmiesing	eschmiesing@winthrop.com	Winthrop & Weinstine, P.A.	225 South Sixth Street Suite 3500 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Peter	Scholtz	peter.scholtz@ag.state.mn.us	Office of the Attorney General-RUD	Suite 1400 445 Minnesota Street St. Paul, MN 55101-2131	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Christine	Schwartz	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Jessie	Seim	jessie.seim@pic.org	Prairie Island Indian Community	5636 Sturgeon Lake Rd Welch, MN 55089	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Darrell	Seki, Sr.	dseki@redlakenation.org	Red Lake Nation	15484 Migizi Drive Red Lake, MN 56671	Electronic Service	No	OFF_SL_22-538_Official CC Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th Pl E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_22-538_Official CC Service List
Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates	7400 Lyndale Ave S Ste 190 Richfield, MN 55423	Electronic Service	Yes	OFF_SL_22-538_Official CC Service List
Bria	Shea	bria.e.shea@xcelenergy.com	Xcel Energy	414 Nicollet Mall Minneapolis, MN 55401	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Colleen	Sipiorski	Colleen.Sipiorski@wecenergygroup.com	Minnesota Energy Resources Corporation	700 North Adams St Green Bay, WI 54307	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Tom	Slukich	tom@nationalconductor.com	National Conductor Constructors	18119 Hwy 371 North Brainerd, MN 56401	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Nizhoni	Smith	nizhoni.smith@lowersioux.com	Lower Sioux Indian Community	PO Box 308 39527 Reservation Highway 1 Morton, MN 56270	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.	76 W Kellogg Blvd St. Paul, MN 55102	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Joel	Smith	jsmith@mnchippewatribe.org	Minnesota Chippewa Tribe	PO Box 217 Cass Lake, MN 56633	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Roger	Smith, Sr.	RogerMSmithSr@fdlrez.com	Fond du Lac Band of Lake Superior Chippewa	1720 Big Lake Road Cloquet, MN 55720	Electronic Service	No	OFF_SL_22-538_Official CC Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Adam	Sokolski	adam.sokolski@edf-re.com	EDF Renewable Energy	10 Second Street NE Ste 400 Minneapolis, MN 55410	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Eugene	Sommers	eugene.sommers@whiteearth-nsn.gov	White Earth Nation	PO BOX 418 White Earth, MN 56591	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Peggy	Sorum	peggy.sorum@centerpointenergy.com	CenterPoint Energy	505 Nicollet Mall Minneapolis, MN 55402	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Marie	Spry	mariespry@grandportage.com	Grand Portage Band of Lake Superior Chippewa	PO Box 428 Grand Portage, MN 55605	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Cheyenne	St. John	cheyenne.stjohn@lowersioux.com	Lower Sioux Tribal Community	39527 Reservation Hwy 1 Morton, MN 56270	Electronic Service	No	OFF_SL_22-538_Official CC Service List
LeRoy	Staples Fairbanks III	leroy.fairbanks@llojibwe.net	Leech Lake Band of Ojibwe	190 Sailstar Drive NW Cass Lake, MN 56633	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Byron E.	Starns	byron.starns@stinson.com	STINSON LLP	50 S 6th St Ste 2600 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Kristin	Stastny	kstastny@taftlaw.com	Taft Stettinius & Hollister LLP	2200 IDS Center 80 South 8th St Minneapolis, MN 55402	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Toby	Stephens	tobys@grandportage.com	Grand Portage Band of Lake Superior Chippewa	PO BOX 428 Grand Portage, MN 55605	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Cary	Stephenson	cStephenson@otpc.com	Otter Tail Power Company	215 South Cascade Street Fergus Falls, MN 56537	Electronic Service	No	OFF_SL_22-538_Official CC Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Mark	Strohfus	mstrohfus@greenergy.com	Great River Energy	12300 Elm Creek Boulevard Maple Grove, MN 553694718	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Carl	Strohlm	cjsmg@sbcglobal.net	SBC Global	105 East Edgewood Ave Indianapolis, IN 46227	Electronic Service	No	OFF_SL_22-538_Official CC Service List
James M	Strommen	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered	150 S 5th St Ste 700 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Samuel	Strong	Sam.strong@redlakenation.org	Red Lake Nation	15484 Migizi Drive Red Lake, MN 56671	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Tom	Swafford	tswafford@umsi.us	Utility Mapping Services, Inc	3947 E Calvary Rd Suite 103 Duluth, MN 55803	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Eric	Swanson	eswanson@winthrop.com	Winthrop & Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Todd	Tadych	ttadych@atcllc.com	American Transmission Company LLC	5303 Fen Oak Dr Madison, WI 53718	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Camille	Tanhoff	kamip@upperSiouxcommunity-nsn.gov	Upper Sioux Community	5722 Travers Lane PO BOX 147 Granite Falls, MN 56241	Electronic Service	No	OFF_SL_22-538_Official CC Service List
JoAnn	Thompson	jthompson@otpc.com	Otter Tail Power Company	P.O. Box 496 215 South Cascade Street Fergus Falls, MN 565380496	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Stuart	Tommerdahl	stommerdahl@otpc.com	Otter Tail Power Company	215 S Cascade St PO Box 496 Fergus Falls, MN 56537	Electronic Service	No	OFF_SL_22-538_Official CC Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Jayme	Trusty	execdir@swrdc.org	SWRDC	2401 Broadway Ave #1 Slayton, MN 56172	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Caralyn	Trutna	carrie@upperSiouxcommunity-nsn.gov	Upper Sioux Community	Upper Sioux Community P.O. Box 147 Granite Falls, MN 55372	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Jen	Tyler	tyler.jennifer@epa.gov	US Environmental Protection Agency	Environmental Planning & Evaluation Unit 77 W Jackson Blvd. Mailstop B-19J Chicago, IL 60604-3590	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Leonard	Wabasha	leonard.wabasha@shakopeedakota.org	Shakopee Mdewakanton Sioux Community	2300 Tiwahe Circle Shakopee, MN 55379	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Caren	Warner	caren.warner@state.mn.us	Department of Commerce	85 7th Place East Suite 280 St. Paul, MN 55101-2198	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Luke	Warnsholz	lwarnsholz@boisforten-sn.gov	Bois Forte Band of Chippewa	Bois Forte Tribal Government 5344 Lakeshore Drive Nett Lake, MN 55772	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Cynthia	Warzecha	cynthia.warzecha@state.mn.us	Minnesota Department of Natural Resources	500 Lafayette Road Box 25 St. Paul, MN 55155-4040	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Elizabeth	Wefel	eawefel@flahertyhood.com	Flaherty & Hood, P.A.	525 Park St Ste 470 Saint Paul, MN 55103	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Heather	Westra	heather.westra@pic.org	Prairie Island Indian Community	5636 Sturgeon Lake Rd Welch, MN 55089	Electronic Service	No	OFF_SL_22-538_Official CC Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Alan	Whipple	sa.property@state.mn.us	Minnesota Department Of Revenue	Property Tax Division 600 N. Robert Street St. Paul, MN 551463340	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Noah	White	noah.white@piic.org	Prairie Island Indian Community	5636 Sturgeon Lake Road Welch, MN 55089	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Deanna	White	mncwa@cleanwater.org	Clean Water Action & Water Fund of MN	330 S 2nd Ave Ste 420 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Steve	White	steve.white@llojbwe.net	Leech Lake Band of Ojibwe	190 Sailstar Drive NW Cass Lake, MN 56633	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Cody	Whitebear	cody.whitebear@piic.org	Prairie Island Indian Community	5636 Sturgeon Lake Road Welch, MN 55089	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Rachel	Wiedewitsch	wiedewitsch@fresh-energy.org	Fresh Energy	408 St Peter St #350 St. Paul, MN 55102	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Mike	Wilson	Mike.Wilson@millelacsband.com	Mille Lacs Band of Ojibwe	43408 Odena Dr Onamia, MN 56359	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Virgil	Wind	virgil.wind@millelacsband.com	Mille Lacs Band of Ojibwe	43408 Odena Drive Onamia, MN 56359	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Joseph	Windler	jwindler@winthrop.com	Winthrop & Weinstine	225 South Sixth Street, Suite 3500 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Terry	Wolf	terry.wolf@mrenergy.com	Missouri River Energy Services	3724 W Avera Dr PO Box Sioux Falls, SD 571098920	Electronic Service	No	OFF_SL_22-538_Official CC Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Jonathan	Wolfgram	Jonathan.Wolfgram@state.mn.us	Office of Pipeline Safety	445 Minnesota St Ste 147 Woodbury, MN 55125	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Laurie	York	laurie.york@whiteearth-nsn.gov	White Earth Reservation Business Committee	PO Box 418 White Earth, MN 56591	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Ian	Young	IanYoung@FDLREZ.COM	Fond du Lac Band of Lake Superior Chippewa	1720 Big Lake Road Cloquet, MN 55720	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Kurt	Zimmerman	kwz@ibew160.org	Local Union #160, IBEW	2909 Anthony Ln St Anthony Village, MN 55418-3238	Electronic Service	No	OFF_SL_22-538_Official CC Service List
Patrick	Zomer	Pat.Zomer@lawmoss.com	Moss & Barnett PA	150 S 5th St #1200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_22-538_Official CC Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
David	Bell	david.bell@state.mn.us	Department of Health	POB 64975 St. Paul, MN 55164	Electronic Service	No	SPL_SL_CN - CERTIFICATE OF NEEDS
Randall	Doneen	randall.doneen@state.mn.us	Department of Natural Resources	500 Lafayette Rd, PO Box 25 Saint Paul, MN 55155	Electronic Service	No	SPL_SL_CN - CERTIFICATE OF NEEDS
Kate	Fairman	kate.frantz@state.mn.us	Department of Natural Resources	Box 32 500 Lafayette Rd St. Paul, MN 551554032	Electronic Service	No	SPL_SL_CN - CERTIFICATE OF NEEDS
Annie	Felix Gerth	annie.felix-gerth@state.mn.us		Board of Water & Soil Resources 520 Lafayette Rd Saint Paul, MN 55155	Electronic Service	No	SPL_SL_CN - CERTIFICATE OF NEEDS
Todd	Green	Todd.A.Green@state.mn.us	Minnesota Department of Labor & Industry	443 Lafayette Rd N St. Paul, MN 55155-4341	Electronic Service	No	SPL_SL_CN - CERTIFICATE OF NEEDS
Kari	Howe	kari.howe@state.mn.us	DEED	332 Minnesota St, #E200 1ST National Bank Bldg St. Paul, MN 55101	Electronic Service	No	SPL_SL_CN - CERTIFICATE OF NEEDS
Ray	Kirsch	Raymond.Kirsch@state.mn.us	Department of Commerce	85 7th Place E Ste 500 St. Paul, MN 55101	Electronic Service	No	SPL_SL_CN - CERTIFICATE OF NEEDS
Chad	Konickson	chad.konickson@usace.army.mil	U.S.Army Corps of Engineers	180 5th St # 700 Saint Paul, MN 55101	Electronic Service	No	SPL_SL_CN - CERTIFICATE OF NEEDS
Stacy	Kotch Egstad	Stacy.Kotch@state.mn.us	MINNESOTA DEPARTMENT OF TRANSPORTATION	395 John Ireland Blvd. St. Paul, MN 55155	Electronic Service	No	SPL_SL_CN - CERTIFICATE OF NEEDS
Dawn S	Marsh	dawn_marsh@fws.gov	U.S. Fish & Wildlife Service	Minnesota-Wisconsin Field Offices 4101 American Blvd E Bloomington, MN 55425	Electronic Service	No	SPL_SL_CN - CERTIFICATE OF NEEDS

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Stephan	Roos	stephan.roos@state.mn.us	MN Department of Agriculture	625 Robert St N Saint Paul, MN 55155-2538	Electronic Service	No	SPL_SL_CN - CERTIFICATE OF NEEDS
Jayme	Trusty	execdir@swrdc.org	SWRDC	2401 Broadway Ave #1 Slayton, MN 56172	Electronic Service	No	SPL_SL_CN - CERTIFICATE OF NEEDS
Jen	Tyler	tyler.jennifer@epa.gov	US Environmental Protection Agency	Environmental Planning & Evaluation Unit 77 W Jackson Blvd. Mailstop B-19J Chicago, IL 60604-3590	Electronic Service	No	SPL_SL_CN - CERTIFICATE OF NEEDS
Cynthia	Warzecha	cynthia.warzecha@state.mn.us	Minnesota Department of Natural Resources	500 Lafayette Road Box 25 St. Paul, MN 55155-4040	Electronic Service	No	SPL_SL_CN - CERTIFICATE OF NEEDS
Alan	Whipple	sa.property@state.mn.us	Minnesota Department Of Revenue	Property Tax Division 600 N. Robert Street St. Paul, MN 551463340	Electronic Service	No	SPL_SL_CN - CERTIFICATE OF NEEDS
Jonathan	Wolfgram	Jonathan.Wolfgram@state.mn.us	Office of Pipeline Safety	445 Minnesota St Ste 147 Woodbury, MN 55125	Electronic Service	No	SPL_SL_CN - CERTIFICATE OF NEEDS