



414 Nicollet Mall
Minneapolis, MN 55401

June 05, 2025

—Via Electronic Filing—

Will Seuffert
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101

RE: COMMENTS
CARBON-FREE STANDARD – FUEL LIFE-CYCLE ANALYSIS FRAMEWORK
DOCKET NO. E999/CI-24-352

Dear Mr. Seuffert:

Northern States Power Company, doing business as Xcel Energy, submits the enclosed Comments to the Minnesota Public Utilities Commission responding to the January 22, 2025 Notice of Comment Period.

We have electronically filed this document with the Minnesota Public Utilities Commission, and copies have been served on the parties on the attached service list. Please contact Patti Leaf at patricia.b.leaf@xcelenergy.com or me at bria.e.shea@xcelenergy.com if you have any questions regarding this filing.

Sincerely,

/s/

BRIA E. SHEA
REGIONAL VICE PRESIDENT, REGULATORY POLICY

Enclosures
cc: Service Lists

STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION

Katie J. Sieben	Chair
Hwikwon Ham	Commissioner
Audrey Partridge	Commissioner
Joseph K. Sullivan	Commissioner
John A. Tuma	Commissioner

IN THE MATTER OF INVESTIGATION
INTO A FUEL LIFE-CYCLE ANALYSIS
FRAMEWORK FOR UTILITY
COMPLIANCE WITH MINNESOTA'S
CARBON-FREE STANDARD

DOCKET NO. E999/CI-24-352

COMMENTS

INTRODUCTION

Northern States Power Company, doing business as Xcel Energy, submits these Comments to the Minnesota Public Utilities Commission in response to the Commission's January 22, 2025 Notice of Comment Period. We provide input on most, but not all, of the topics identified in the Notice.

In summary, Xcel Energy:

- Supports the development of a Life Cycle Analysis (LCA) framework to enable understanding and consistency among all participants and to manage and establish expectations of the process,
- Reiterates our position that storage assets should be viewed as a pass through such that compliance with the Carbon Free Standard (CFS) is based upon the source of electricity generation,
- Endorses CFS compliance tracking for partial compliance based on net generation,
- Maintains our position on partial compliance accounting for Carbon Capture and Sequestration/Storage (CCS) and co-firing of fuels, and
- Suggests that biomass, renewable natural gas (RNG) and solid waste should be eligible as partially or fully carbon-free (CF) generation resources based upon the outcome of an LCA.

COMMENTS

I. BACKGROUND

In 2023, the Minnesota Legislature passed legislation establishing Minnesota’s CFS, requiring Minnesota utilities to generate or procure sufficient energy to provide 100 percent CF energy to their Minnesota retail customers by 2040 as reflected in Minn. Stat. § 216B.1691 subd. 2(g). The Commission initiated Docket No. E999/CI-23-151 to investigate implementing changes to the criteria and standards used to measure compliance with the CFS. On November 7, 2024 the Commission issued an ORDER INITIATING NEW DOCKET to begin record development designed to permit the Commission to render a decision by December 31, 2025.¹

The Order noted that the record in Docket No. E999/CI-23-151 was not sufficient to establish the criteria and standards necessary to permit a utility to calculate its partial compliance with the CFS – and that the most reasonable course of action was to initiate a new docket aimed at engaging in a more granular analysis of threshold issues identified by commenters. The Order further explains that distilling these issues is vital to the Commission’s consideration of the calculations, methodologies, and analyses that will aid successful implementation of the statute in a manner consistent with legislative policy goals and the public interest.

The Commission issued a Notice of Comment Period in the instant docket on January 22, 2025 to explore what actions, if any, the Commission should take to establish the criteria and standards necessary for utilities to calculate partial compliance with the CFS specifically requesting comments on the following:

- Definitions of the sources of and requirements for a life-cycle analysis when interpreting the statutory definition of “carbon free” for combusted fuel generation resources without carbon capture that are considered carbon free or receiving partial credit consistent with the November 7, 2024 Order.
- Definitions of the sources of and requirements for a fuel to qualify as sustainable and waste biomass.
- The Partnership on Waste and Energy’s recommendations regarding the scope of the instant docket.²

¹ *In the Matter of a Commission Investigation into a Fuel Life-Cycle Analysis Framework for Utility Compliance with Minnesota’s Carbon-Free Standard*, Docket No. E999/CI-24-352.

² Provided in the Partnership on Waste and Energy’s June 28, 2024 Comments and July 24, 2024 Reply Comments and summarized in Appendix 2 of Staff’s September 12, 2024 Briefing Papers.

- Development of an accounting methodology to consider energy withdrawn from short-, medium-, and long-duration storage assets.
- Calculating partial compliance based on the net annual generation defined as “carbon-free.”
- Calculating partial compliance for fossil fuel generation with carbon capture and sequestration/storage (CCS) by estimating the total direct carbon dioxide emissions per megawatt-hour (MWh) reduced by the CCS and applying that percentage to the output of the generation resource employing CCS to determine its carbon-free generation.
- Whether biomass, renewable natural gas, and solid waste should be eligible as fully or partially carbon-free generation resources based on a fuel life-cycle analysis.
- Calculating partial compliance by generators burning waste materials based on a fuel cumulative life-cycle basis considering greenhouse gas benefits relative to alternative waste management methods.
- The definition and calculation of net market purchases.
- Are there any other issue or concerns related to this matter?

II. LIFE CYCLE ANALYSIS

The Company supports the need for further Commission guidance on how to define the sources of and requirements for LCAs. As a threshold matter, the Company believes establishment of an LCA framework will enable understanding and consistency among participants and will manage overall expectations of the LCA process. We suggest that the framework should not only identify the sources and requirements of an LCA but also include (1) definitions; (2) acceptable processes (including modeling and modeling alternatives); (3) identify governance and oversight responsibilities; (4) identify timing considerations; and (5) address the use and application of LCA results. We recommend developing a high-level, structural framework rather than a detailed, specific framework, as the development of LCAs may evolve over time.

The Company offers the following for consideration in the establishment of an LCA framework:

A. LCA Carbon-Free Resources Definitions

An important first step in developing an LCA framework is to identify resources that

are considered CF and do not require an LCA.³ Consistent with our previous comments,⁴ the following resources should not require an LCA:

- Resources identified in Minn. Stat. § 216B.1691 subd. (c) as “eligible energy technologies” (EETs), including wind, solar, hydro-power and hydrogen generated from these carbon-free resources; and
- Electricity generated from nuclear power plants.⁵

Next, it is necessary to define resources that will require an LCA for purposes of CFS compliance tracking. In this docket, the LCA process should apply to resources that combust fuels that may (or could) emit carbon dioxide in the generation of electricity and have not previously been identified as CF per Minn. Stat. § 216B.1691 subd. (c) or through the LCA process.

B. LCA Framework and Definitions

1. LCA Framework

To enable consistency across LCAs, it is necessary to establish the requirements for an LCA. We suggest that the Natural Gas Innovation Act (NGIA) and the NGIA Greenhouse Gas Frameworks Docket⁶ would provide helpful resources as a starting point to establish such requirements. In that docket, the Commission already requires utilities to file expected greenhouse gas (GHG) intensities, also referred to as carbon intensities (CI), based upon the outcome of an LCA, for natural gas and for all “innovative resources” that are eligible for inclusion in a NGIA Plan. The Company recommends that, at a minimum, a state agency (or agencies) be identified as responsible for developing, overseeing and managing the LCA framework and review of LCAs.

³ In accordance with Minn. Stat. § 216B.1691, any fuel that does not release carbon dioxide to the atmosphere in the generation of electricity should be considered CF. CF resources are, by definition, carbon-free and should, therefore, receive 100% credit toward CFS compliance without requiring an LCA.

⁴ June 28, 2024, July 24, 2024 and January 29, 2025 Xcel Energy Comments filed in Docket No. E999/CI-23-151 Docket No. E999/CI-23-151 Xcel Energy’s June 28, 2024 Comments, July 24, 2024 Reply Comments and January 29, 2025 Comments.

⁵ If CFS compliance ultimately requires the retirement of a renewable energy certificate (REC) or Alternative Energy Credit (AEC) or Energy Attribute Credit (EAC) for each MWh, then the Commission should establish a process whereby nuclear generation is allocated RECs, AECs or EACs.

⁶ June 1, 2022 ORDER ESTABLISHING FRAMEWORKS FOR IMPLEMENTING MINNESOTA’S NATURAL GAS INNOVATION ACT. In the Matter of Establishing Frameworks to Compare Lifecycle Greenhouse Gas Emission Intensities of Various Resources, and to Measure Cost Effectiveness of Individual Resources and of Overall Innovation Plans. Docket No. G999/CI-21-566 (NGIA Frameworks Docket).

a. LCA Framework Definitions

As part of the development of an LCA framework we suggest that the following LCA definitions be established:

- **LCA Boundaries:** The boundaries of an LCA determine the scope of the analysis. LCA Boundaries will determine how far upstream and downstream on a particular resource's supply chain GHG emissions are evaluated. For example, the NGIA statutory definition of "Lifecycle greenhouse gas emissions" means the aggregate GHG resulting from the production, processing, transmission, and consumption of an energy resource.⁷
- **LCA Key Data Inputs:** The Commission may also wish to specify key data inputs, as it did in the NGIA GHG Frameworks Docket. As in the NGIA docket, it is important to allow project or fuel-specific inputs when available, but to also provide the option to rely on default data and industry assumptions if project- or fuel-specific inputs are not available.
- **Comparative Scenario Evaluations:** Comparative Scenario Evaluations (CSE) should be allowed as part of the LCA process. A CSE can be used to compare two fuel pathways to determine which fuel pathway is better for the environment and whether or not the fuel pathway can be identified as a wholly or partially CF fuel pathway. The requirements of such evaluations should be defined including a definition of a baseline as usual (i.e., a counterfactual scenario of what GHG emissions would occur in the absence of fuel production). This concept is illustrated by Argonne National Laboratory in an outline of an approach to RNG LCA using Argonne National Laboratory's Greenhouse Gases, Regulated Emissions, and Energy Use in Transportation Model (GREET).⁸
- **Approved Carbon-Free Fuel Pathways:** A process should be defined by which CF fuel pathways are approved via the LCA process, including documentation of the approved fuel type, feedstock, and production processes. Once a fuel pathway has been defined as CF, either initially or after undertaking an LCA, the CF fuel pathway should be added to an "Approved CF Fuel Pathway" list. This process could be informed by the Certified Pathways website the California Air Resources Board (CARB) maintains for their Low Carbon Fuel Standard (LCFS), which references the carbon intensity (CI) values of fuel resources.⁹ Defining and tracking approved CF fuel pathways will simplify compliance by allowing a utility to rely on an already approved pathway, as long as their process is sufficiently similar, rather than requiring

⁷ Minn. Stat. § 216B.2427, Subd. 1(j).

⁸ https://netl.doe.gov/sites/default/files/netl-file/24RS_MMT_Cai.pdf - see slide 10.

⁹ [LCFS Pathway Certified Carbon Intensities | California Air Resources Board](#).

every generator, fuel and project to conduct its own LCA.

- **LCA Outputs:** The required outputs of an LCA that will be used to inform decision making should also be identified in order to guide the LCA process. The output from an LCA is usually a CI score, measured as emissions per unit of energy. For example, NGIA statute defines “Lifecycle greenhouse gas emissions intensity” as lifecycle greenhouse gas emissions per unit of energy delivered to an end user.¹⁰

This list of definitions is not all encompassing, and there are likely other definitions that will be needed to describe parts of the LCA process not noted above.

b. Consideration of Relevant Examples

The Company notes that the Commission has previously established an LCA framework for the natural gas sector through the NGIA GHG Frameworks Docket and its approval of the state’s first two NGIA Plans (for CenterPoint Energy and Xcel Energy). We recommend consideration of the NGIA GHG Framework as helpful background information for the establishment of an LCA framework. However, we recommend the LCA framework be simplified and tailored specifically for application to the electric sector CFS. We suggest incorporation of the following components from the current NGIA framework into an LCA framework:

- 1) outlining how the data will be used in decision making;
- 2) establishing a clear, flexible methodology; and
- 3) identification of key input parameter requirements, with the option to use default assumptions when necessary.

We also suggest that this docket can be informed by the LCFS in place in other states, which rely on LCA to qualify fuels as eligible for a state LCFS. For example, CARB maintains a repository of streamlined and accepted CF fuel pathways for easy use,¹¹ as well as an option to file and secure CARB approval of a newly proposed pathway. There is a clear governance structure with dedicated CARB staff to support the efforts, review and approve pathways. Establishing standardized approaches and approved pathways will be important for efficiency; CARB has a large, dedicated LCFS staff to maintain the process, which is not the case in Minnesota.

¹⁰ [Minn. Stat. § 216B.2427, Subd. 1\(j\).](#)

¹¹ [LCFS Pathway Certified Carbon Intensities | California Air Resources Board.](#)

C. Streamlined Pathways

Conducting and reviewing LCAs will require significant effort from both utilities and the state agency (or agencies) designated as responsible for this role. The Company suggests that the identified agency also be responsible for establishing streamlining LCA pathways for common fuel types, including certain production pathways for hydrogen and RNG, with stakeholder input. We recommend the following:

- As noted above, identify hydrogen produced with an EET¹² as an established CF fuel pathway that does not require an LCA. Hydrogen not produced with an EET, along with RNG and other fuels purchased with associated renewable thermal credits tracked through M-RETS¹³ should also be identified as CF and should not be required to conduct an LCA to count towards CFS compliance, as an LCA is already required in order to issue the renewable thermal credit.
- The Company suggests that the utility proposing a new CF fuel pathway for compliance demonstration purposes should be responsible for conducting and providing the results of an LCA for review by the identified responsible agency (or agencies).
- The Company further notes that once the LCA results for a given CF fuel pathway are approved by the responsible agency, that CF fuel pathway should be added to an “approved CF fuel pathways” list that other utilities can rely on without needing to conduct another LCA. In order to rely on the “approved CF fuel pathways” list, the resource relying on the list would need to have similar source and production pathways as the resource on the list.

D. Use of the LCA Framework in Decision-Making

The LCA framework should identify how the results of an LCA will be used to qualify resources as CF, partially CF, or not CF. LCA models are developed to calculate CI scores. CI scores measure the total greenhouse gas emissions per unit of energy. A lower CI score indicates a fuel with lower CO₂(e) emissions than a fuel with a higher CI score. The resulting CI scores of various fuel pathways can be compared to evaluate which are lower in CO₂(e) as compared to other fuel pathways. A process will need to be established to determine if a fuel qualifies as CF in and of itself, or partially CF based upon the resulting CI score(s) as compared to other fuel pathways’ CI scores.

The Company suggests there are two approaches that could be taken to identify whether a CF fuel pathway is considered CF, partially CF, or not CF based upon the

¹² Minn. Stat. § 216B.1691, Subd. 1 (c)(4).

¹³ Rebranded to CleanCounts, May 6, 2025, [M-RETS Rebrands to CleanCounts](#).

outcome of an LCA. These options could be implemented independently or stacked one upon the other:

1. Establish a CI threshold that a CF fuel pathway must meet to be considered CF; or
2. Consider the extent to which a CF fuel pathway is CF based on an LCA CI score and assign partial credits.

The Company recommends establishing a CI threshold level below which a CF fuel pathway is considered CF. This approach is conceptually similar to the NGIA approach. If a CI value for a CF fuel pathway is greater than the threshold, then a CSE could be conducted to determine if the CF fuel pathway can receive partial credit or not (see section V for more details on partial credits). If, as a result of a CSE, a fuel pathway is deemed partially CF, it should also be added to the approved CF fuel pathway list noting the partial credit amount.

E. LCA Modeling Methodologies

We recommend that the Commission approve and establish modeling methodologies, alternative modeling methodologies, and comparative evaluation guidelines that can be utilized to conduct an LCA. The methodologies and guidelines must allow flexibility while providing consistency, identifying lifecycle boundaries, and key input parameters across fuel types and utilities.

The list of approved methodologies and guidelines should not be static but should allow for revisions as refinements are brought forth and deemed appropriate.

1. LCA Modeling

We note that currently the GREET Model¹⁴ is considered the gold standard for conducting LCAs and allows the removal or modification of calculations to adapt to other sectors, as was done in the context of NGIA. The GREET Model establishes boundaries, baseline concepts, and provides default data. The GREET Model is currently maintained by Argonne National Laboratory with robust, scientific rigor.

We support conducting LCAs on each individual fuel pathway requiring an LCA, rather than conducting an LCA on a combination of fuel pathways as would occur with fuel blending. LCA results can be applied to account for any fuel blending that

¹⁴ [GREET: The Greenhouse Gases, Regulated Emissions, and Energy Use in Transportation Model | Department of Energy.](#)

occurs prior to combustion. For example, if two fuels are blended, one identified as a CF fuel pathway and the other not, the portion of the electricity generated by the CF resource (on a heat input basis) would count toward CFS compliance demonstration and the portion of electricity generated by the non-CF resource would not count towards compliance.

2. *LCA Modeling Alternatives*

In addition to modeling, we recommend that prior studies and literature reviews, such as the University of Buffalo’s study on Waste-to-Energy facilities,¹⁵ many of which are conducted using GREET modeling and other robust methodologies, should be allowed for consideration if they are for a similar fuel pathway. In addition, we recommend allowing leveraging credible sources of existing LCA analysis results in lieu of conducting an LCA where appropriate (e.g., as approved by CARB or in other states).

3. *Comparative Scenario Evaluations*

CSEs comparing two or more waste management alternatives, both of which ultimately release GHGs to the atmosphere, should be allowed both as part of an LCA and as an LCA modeling alternative. A CSE could result in a fuel resource being granted “partial credit” (see discussion below in section V. Partial Compliance for further details on “partial credit”) if it ultimately provides a lower-GHG alternative than other management options. The details on how partial credits would be issued would have to be identified as part of the LCA framework.

The Company supports the use of the GREET Model where appropriate for LCAs, along with providing the ability to rely on alternative methodologies, inclusive of CSE analysis, that follow the general principles of the GREET Model.¹⁶ While GREET has many advantages and is generally considered the gold standard for lifecycle analysis, it does not provide a pathway for all possible fuel types for electric generation. There is no LCA model that does so today, so flexibility for alternatives and emerging models will be important.

¹⁵ “Current and Future Life Cycle Greenhouse Gas Emissions Modeling for Xcel Energy Waste-to-Energy Facilities,” Dr John D. Atkinson and Dr. Michael Shelly, University at Buffalo, The State University of New York, Spring 2023, Appendix W1, Docket No. E002/RP-24-67, Xcel Energy’s 2024-2040 Upper Midwest Integrated Resource Plan, [20242-203029-02](#).

¹⁶ [GREET: The Greenhouse Gases, Regulated Emissions, and Energy Use in Transportation Model | Department of Energy](#).

F. LCA Governance and Oversight Process

We believe it will be important for the Commission to ultimately decide, with technical input from the designated state agency, whether a fuel pathway is considered CF or partially CF and can be added to the approved CF fuels pathway list or not.

We suggest a state agency (or agencies) with relevant expertise, such as the MPCA, should be designated to review and make a recommendation to the Commission on approving or denying the results of an LCA conducted by or on behalf of a utility. However, if an LCA conducted by or on behalf of a utility is ultimately denied for a given fuel pathway by the Commission, there should be a process for the utility to appeal the decision. In addition, another LCA analysis for the denied fuel pathway should be allowed to be undertaken by the same or another utility.¹⁷

G. Timing Considerations

There are multiple timing considerations to be addressed in the establishment of the LCA process.

- Once an LCA is submitted to the designated state agency for review, the review should be completed and approved or denied by the Commission expeditiously for utility planning purposes; we suggest that the review process be completed within six months.
- In addition, we suggest that it is necessary for utility planning purposes for the Commission to proactively identify the valid duration of an LCA outcome – recognizing that long-term planning and cost-effectiveness decisions may be grounded in the LCA determination.
- The Company recommends that LCAs be conducted based on annual data, consistent with CFS compliance, over a time horizon consistent with the lifespan of the resource for a utility's planning process and cost effectiveness determinations. This approach would balance the annual statutory directives and functionality of leading models such as the GREET Model, while providing longer term assurance for resource planning.
- It is necessary that utilities have assurance that a resource will be able to be relied upon for demonstrating CFS compliance at the time they are making resource decisions. At the same time, it is recognized that assumptions and data used in LCAs may evolve over time. Once a resource qualifies as CF or partially CF, that designation should remain in place for the duration of the

¹⁷ We think it vital to allow for additional LCAs for a given fuel pathway be allowed to be presented for consideration of being CF. Data inputs may vary from one analysis to another and/or new and/or updated information may be available upon which the LCA relies.

lifetime of the asset, unless and until significant modifications are made to the fuel type or generation resource.

H. Compliance Tracking

It will also be important to consider how LCA requirements and results intersect with broader compliance tracking being discussed in related dockets – specifically Docket No. E999/CI-23-151.

In addition, it will be important for the Commission or identified responsible agency to consider how partial compliance, partial credits (see section V. Partial Compliance for further details on this topic), and renewable thermal credits for fuels such as RNG and hydrogen can be leveraged for compliance tracking purposes in this docket and in Docket No. E999/CI-23-151.

The Company notes that M-RETs provides renewable thermal credits for RNG and hydrogen fuels, as well as for electricity attribute credits. The Commission should consider establishing a process to translate these renewable thermal credits to a REC for compliance tracking purposes. We recognize that renewable thermal credits are not available for all fuels, but they should be relied upon for CFS compliance demonstration purposes as available.

III. PARTNERSHIP ON WASTE AND ENERGY'S RECOMMENDATIONS

In response to the Commission's request for comments on the Partnership on Waste and Energy's (the Partnership) recommendations,¹⁸ the Company concurs with the Partnership that multiple Minnesota policy goals should be considered in the LCA process in order to "produce overall optimum protection for the environment and the climate," with the acknowledgement that "[r]educing climate impacts is the ultimate policy driver behind the passage of Minnesota Session Laws, 2023, Regular Session Chapter 7 and amending Minn. Stat. § 216B.1691."¹⁹ Making a decision affecting one process without consideration of ultimate impacts on other processes/in other areas could create inefficiencies, inconsistencies, negative results, and/or unintended consequences.

We also concur with the Partnership that CF determinations should: (1) take into consideration not only emissions of carbon dioxide but also emissions of methane

¹⁸ Provided in the Partnership on Waste and Energy's June 28, 2024 Comments and July 24, 2024 Reply Comments and summarized in Appendix 2 of Staff's September 12, 2024 Briefing Papers.

¹⁹ Docket No. E999/CI-23-151 Partnership on Waste and Energy's June 28, 2024 Comments at 1.

and nitrous oxides, measured in CO₂(e) terms, especially when considering waste management efforts; and (2) be based on an analysis of net, not gross, generation and associated emissions.

However, we disagree with the Partnership's recommendation that "[a] full lifecycle carbon accounting of all energy resources, processes and technologies should be conducted in a comprehensive manner..."²⁰ There is no need to conduct a full lifecycle carbon accounting of energy resources already deemed CF such as wind, solar, nuclear etc. Conducting such an evaluation would be a time-intensive, unnecessary exercise.

IV. STORAGE ASSET ACCOUNTING

Regarding the need to develop an accounting methodology to consider energy withdrawn from short-, medium-, and long-duration storage assets, the Company views these assets as temporary storage for electricity and does not believe that a separate accounting methodology is needed for storage assets. Compliance requirements, including whether an LCA is needed, should be based on the generation resource itself. Post-generation storage of already generated electricity is not relevant to the CF compliance determination. Compliance methodologies being discussed in Docket No. E999/CI-23-151 include protocols for tracking owned CF generation and long-term Power Purchase Agreements, as well as net CF purchases from the market. Generation stored from CF resources will be covered by these protocols in that docket, and if the generation of stored energy is not from CF resources, it should not be included in compliance determination demonstrations. Storage is necessary for the continued build-out and reliance on CF intermittent resources and should not be burdened by an additional LCA on top of any LCA required for the generation resource that initially produces the stored energy.

V. PARTIAL COMPLIANCE

Regarding the calculation of partial compliance for CCS, biomass, RNG, solid waste and waste materials, the Company first and foremost encourages the Commission to define "partial compliance" as compared to "full compliance" to ensure all participants have a common understanding of the two terms. We have found the term "partial compliance" used in this docket and in Docket No. E999/CI-23-151 to refer to several different concepts, including instances of fuel blending, application of control technology, and processes that may result in a lower environmental impact than other management pathways. All of these may be allowed to count, in part,

²⁰ Docket No. E999/CI-23-151 Partnership's July 24, 2024 Comments at 2.

toward CFS compliance. We find use of the term “partial compliance” in all of these examples may lead to confusion.

The Company understands the terms “fully” and “partially” compliant to apply at the electric generation resource level. A generation resource can be “fully” or “partially” compliant. A generation resource is “fully” compliant if 100 percent of the electricity generated by the resource is generated based on a fuel pathway determined to be CF – either initially identified as such through statute, or through the LCA process. This would apply for example to wind, solar, hydrogen produced from an EET, and nuclear generation. It would also apply to other fuel resources, not defined in statute as an EET, that have undertaken an LCA and have been determined through that process to be CF.

A generation resource is “partially” compliant if, in the generation of electricity, the resource relies on:

1. Pollution control technology that does not remove 100 percent of the CO₂ emissions generated, or
2. A mixture of a CF fuel pathway and a non-CF fuel pathway (e.g., blending of hydrogen produced from an EET with natural gas)

We understand “partial **compliance**” to refer to the generation of electricity from resources that:

- Utilize CCS technology, or other yet developed technologies, to reduce emissions of CO₂. As discussed in more detail below, only a certain percentage of generation, equivalent to the CO₂ removal rate, from a resource equipped with CCS would be eligible towards compliance demonstration requirements. While the percentage of energy equivalent to the CCS CO₂ removal rate is deemed “fully” compliant, only a partial amount of the overall generation from the resource is available for compliance demonstration purposes.
- Co-fires a CF resource with a non-CF resource such as hydrogen produced from an EET co-fired with natural gas. Again, while 100 percent of the energy associated with the CF resources is “fully” compliant, only a partial amount of the overall generation from this resource counts towards compliance demonstration requirements. Specifically, the percent of the fuel that is CF (on a heat input, not volumetric, basis) should determine the percent of the facility’s net MWh generation that may be counted toward the CFS compliance demonstration requirements.

In addition, we suggest that the term “partial-**credit**” be applied to CF fuel pathways

that are determined to not be CF and, after undergoing a CSE are ultimately deemed to be a better (i.e., lower net GHG emissions) management opportunity than other options and, as a result, are granted partial CF credit. If a CSE is conducted on a fuel that does not qualify as a CF resource via the LCA process but still provides a lower CI score than other alternatives, it could receive partial credit of the net generation towards CFS compliance. For example, if it is determined via a CSE that the combustion of RDF results in 50 percent lower emissions of CO₂(e) than would occur with the landfilling of the waste, then 50 percent of the net energy generated from the combustion of RDF would count towards CFS compliance demonstration requirements.

A. Carbon-Free Partial Compliance Accounting Methodology

The Company proposes that once a given fuel resource has been identified as a CF fuel pathway, either as an EET or through the LCA process, then the percentage of the annual net generation in MWh, based upon MMBtu heat input from that CF fuel, should contribute to compliance demonstration. Further detail follows in section V.B. below.

B. Calculating CCS, Hydrogen, Renewable Natural Gas or Other Clean-Fuel Blending Partial Compliance

As noted in the Company's June 28, 2024 comments filed in Docket No. E999/CI-23-151, Xcel Energy supports inclusion of CCS resources in determining partial compliance with the CFS. A reasonable interpretation of the meaning of "partial compliance" in Minn. Stat. § 216B.1691, subd. 2d(b)(2)(i) is that this refers to facilities with some form of CCS, hydrogen or other clean-fuel blending, or other technology that does not achieve 100 percent CF electricity generation due to cost or technical limitations. For partial compliance, Xcel Energy's preferred calculation methodology would be to consider the amount of net generation defined as CF correlated to the annual direct CO₂ emissions of the unit(s). For example, if annual direct CO₂ emissions are reduced by 90 percent through CCS, then 90 percent of the net annual generation from the unit(s) should be considered CF and included in compliance demonstration. Relatedly, if 60 percent of the generation by heat input (MMBtu) from a given unit is associated with the combustion of designated CF hydrogen as determined by an LCA, and 40 percent from the combustion of non-CF natural gas, then 60 percent of the net generation should be allowed to be included as CF generation for compliance demonstration purposes. This methodology should also apply to the co-firing of other CF resources with non-CF resources.

In addition, as discussed above, it is the Company's view that partial compliance is

applied at the resource level, and that partial credit is applied at the fuel pathways level such that both can be applied to the net generation from a resource for CFS compliance demonstration purposes. For illustrative purposes only, if for example a generation resource is combusting a Refuse Derived Fuel that has been determined to receive 50 percent CFS credit, and is equipped with CCS with a 90 percent CO₂ removal rate then the amount of generation that can count toward CFS compliance from the resource would be:

$$\text{net MWhs} * 0.5 \text{ (50 percent credit)} * 0.9 \text{ (90 percent CO}_2\text{ removal rate)} = \text{CFS compliant MWhs}$$

C. Biomass, Renewable Natural Gas and Solid Waste Partial Compliance

It is the Company's perspective that biomass, RNG and solid waste should be eligible as fully or partially CF resources based on the outcome of an LCA analysis. If a fuel resource is determined to be a fully or partially CF fuel resource as compared to other waste stream management options, then it should be allowed for inclusion in compliance demonstrations equivalent to the amount of net generation generated associated with the combustion of the fuel resource.

VI. OTHER ISSUES OR CONCERNS RELATED TO THIS MATTER?

We have no additional issues or concerns to share with the Commission at this time.

CONCLUSION

Xcel Energy appreciates the opportunity to provide these comments to the Commission regarding these topics as they pertain to CFS implementation under Minn. Stat. § 216B.1691. We look forward to continued participation in this docket.

Dated: June 5, 2025

Northern States Power Company

CERTIFICATE OF SERVICE

I, Joshua DePauw, hereby certify that I have this day served copies of the foregoing document on the attached list of persons.

xx by depositing a true and correct copy thereof, properly enveloped
with postage paid in the United States mail at Minneapolis, Minnesota

xx electronic filing

DOCKET No. E999/CI-24-352

Dated this 5th day of June 2025

/s/

Joshua DePauw
Regulatory Administrator

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
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3	Jared	Alholinna	jahollinna@grenergy.com	Great River Energy		12300 Elm Creek Boulevard Maple Grove MN, 55369 United States	Electronic Service		No	24-352Official
4	Michael	Allen	michael.allen@allenergysolar.com	All Energy Solar		721 W 26th st Suite 211 Minneapolis MN, 55405 United States	Electronic Service		No	24-352Official
5	Gary	Ambach	gambach@slipstreaminc.org	Slipstream, Inc.		8973 SW Village Loop Chanhausen MN, 55317 United States	Electronic Service		No	24-352Official
6	Jay	Anderson	jaya@cmpas.org	CMPAS		7550 Corporate Way Suite 100 Eden Prairie MN, 55344 United States	Electronic Service		No	24-352Official
7	Keith	Anderson	keith.anderson@shakopeedakota.org	Shakopee Mdewakanton Sioux Community		Shakopee Mdewakanton Sioux Community 2330 Sioux Trail NW Prior Lake MN, 55372 United States	Electronic Service		No	24-352Official
8	Maria	Anderson	manderson@eastriver.coop	East River Electric Power Cooperative, Inc.		P.O. Box 227 211 S. Harth Ave. Madison SD, 57042 United States	Electronic Service		No	24-352Official
9	Susan	Arntz	sarntz@mankatomn.gov	City Of Mankato		P.O. Box 3368 Mankato MN, 56002-3368 United States	Electronic Service		No	24-352Official
10	Mara	Ascheman	mara.k.ascheman@xcelenergy.com	Xcel Energy		414 Nicollet Mall Fl 5 Minneapolis MN, 55401 United States	Electronic Service		No	24-352Official
11	Ray	Auginaush, Sr.	ray.auginaush@whiteearth-nsn.gov	White Earth Nation		White Earth Tribal Headquarters 35500 Eagle View Road Ogema MN, 56569 United States	Electronic Service		No	24-352Official
12	John	Aune	johna@bluehorizonsolar.com	Blue Horizon Energy		171 Cheshire Ln Ste 500 Plymouth MN, 55441 United States	Electronic Service		No	24-352Official
13	Mark	Bakk	mbakk@lcp.coop	Lake Country Power		26039 Bear Ridge Drive	Electronic Service		No	24-352Official

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15	Daniel	Becchetti	dbecchetti@grenergy.com	Great River Energy		12300 Elm Creek Boulevard Maple Grove MN, 55369 United States	Electronic Service		No	24-352Official
16	Todd	Beck	tbeck@grenergy.com			null null, null United States	Electronic Service		No	24-352Official
17	Brian	Bell	bell.brian@dorsey.com	Dorsey & Whitney LLP		50 South Sixth St. Suite 1500 Minneapolis MN, 55402 United States	Electronic Service		No	24-352Official
18	Amadeo	Bellino	amadeo.bellino@whiteearth-nsn.gov	White Earth Nation		White Earth Tribal Headquarters 35500 Eagle View Road Ogema MN, 56569 United States	Electronic Service		No	24-352Official
19	David	Bender	dbender@earthjustice.org	Earthjustice		1001 G Street NW Suite 1000 Washington DC, 20001 United States	Electronic Service		No	24-352Official
20	Melanie	Benjamin	melanie.benjamin@millelacsband.com			43408 Oodena Drive Onamia MN, 56359 United States	Electronic Service		No	24-352Official
21	James J.	Bertrand	james.bertrand@stinson.com	STINSON LLP		50 S 6th St Ste 2600 Minneapolis MN, 55402 United States	Electronic Service		No	24-352Official
22	Derek	Bertsch	derek.bertsch@mrenergy.com	Missouri River Energy Services		3724 West Avera Drive PO Box 88920 Sioux Falls SD, 57109-8920 United States	Electronic Service		No	24-352Official
23	Laura	Bishop	laura.bishop@state.mn.us		Minnesota Pollution Control Agency	520 Lafayette Rd Saint Paul MN, 55155 United States	Electronic Service		No	24-352Official
24	William	Black	bblack@mmua.org	MMUA		Suite 200 3131 Fernbrook Lane North Plymouth MN, 55447 United States	Electronic Service		No	24-352Official
25	Hunter	Boldt	hunterboldt@redlakenation.org	Red Lake Nation		15484 Migizi Drive Red Lake MN, 56671 United States	Electronic Service		No	24-352Official
26	Peter	Boney	pboney@boisforte-nsn.gov	Bois Forte Band of Chippewa		Bois Forte Tribal Government 5344 Lakeshore	Electronic Service		No	24-352Official

[illegible]

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
38	John	Bucknell		Virtus Solis Technologies, Inc.		1511 Pebble Point Drive Troy MI, 48085 United States	Paper Service		No	24-352Official
39	Robert	Budreau	robert.budreau@llojibwe.net	Leech Lake Band of Ojibwe		190 Sailstar Drive NW Cass Lake MN, 56633 United States	Electronic Service		No	24-352Official
40	Brian	Burandt	brian.burandt@connexusenergy.com	Connexus Energy		14601 Ramsey Blvd Ramsey MN, 55303 United States	Electronic Service		No	24-352Official
41	Jessica	Burdette	jessica.burdette@state.mn.us		Department of Commerce	85 7th Place East Suite 500 St. Paul MN, 55101 United States	Electronic Service		No	24-352Official
42	Richard	Burud	rgburud@msn.com	Southern Minnesota Energy Cooperative		31110 Cooperative Way Rushford MN, 55971 United States	Electronic Service		No	24-352Official
43	Jennifer	Cady	jjcady@mnpower.com	Minnesota Power		30 W Superior St Duluth MN, 55802 United States	Electronic Service		No	24-352Official
44	James	Canaday	james.canaday@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	Suite 1400 445 Minnesota St. St. Paul MN, 55101 United States	Electronic Service		Yes	24-352Official
45	Thomas	Carlson	thomas.carlson@edf-re.com	EDF Renewable Energy		10 2nd St NE Ste. 400 Minneapolis MN, 55413 United States	Electronic Service		No	24-352Official
46	Douglas M.	Carnival	dcarnival@carnivalberns.com	McGrann Shea Carnival Straughn & Lamb		800 Nicollet Mall Ste 2600 Minneapolis MN, 55402-7035 United States	Electronic Service		No	24-352Official
47	Pat	Carruth	pat@mnvalleyrec.com	Minnesota Valley Coop. Light & Power Assn.		501 S 1st St. PO Box 248 Montevideo MN, 56265 United States	Electronic Service		No	24-352Official
48	Cathy	Chavers	cchavers@boisforte-nsn.gov	Bois Forte Band of Chippewa		Bois Forte Tribal Government 5344 Lakeshore Drive Nett Lake MN, 55772 United States	Electronic Service		No	24-352Official
49	Marc	Child	mchild@grenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	24-352Official
50	Michael	Childs, Jr.	michael.childsjr@piic.org	Prairie Island Indian Community		Prairie Island Indian Community 5636 Sturgeon Lake Road Welch MN,	Electronic Service		No	24-352Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
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51	Ray	Choquette	rchoquette@agp.com	Ag Processing Inc.		12700 West Dodge Road PO Box 2047 Omaha NE, 68103-2047 United States	Electronic Service		No	24-352Official
52	Steve W.	Chriss	stephen.chriss@walmart.com	Wal-Mart		2001 SE 10th St. Bentonville AR, 72716-5530 United States	Electronic Service		No	24-352Official
53	John	Coffman	john@johncoffman.net	AARP		871 Tuxedo Blvd. St. Louis MO, 63119-2044 United States	Electronic Service		No	24-352Official
54	Kenneth A.	Colburn	kcolburn@symbioticstrategies.com	Symbiotic Strategies, LLC		26 Winton Road Meredith NH, 32535413 United States	Electronic Service		No	24-352Official
55	Generic	Commerce Attorneys	commerce.attorneys@ag.state.mn.us		Office of the Attorney General - Department of Commerce	445 Minnesota Street Suite 1400 St. Paul MN, 55101 United States	Electronic Service		Yes	24-352Official
56	Jean	Comstock	jean.comstock.dbcc@gmail.com	St. Paul 350		729 6th St E St. Paul MN, 55106 United States	Electronic Service		No	24-352Official
57	Hillary	Creurer	hcreurer@allte.com	Minnesota Power		30 W Superior St Duluth MN, 55802 United States	Electronic Service		No	24-352Official
58	George	Crocker	gwillc@nawo.org	North American Water Office		5093 Keats Avenue Lake Elmo MN, 55042 United States	Electronic Service		No	24-352Official
59	Rebecca	Crooks Stratton	rebecca.crooks-stratton@shakopeedakota.org	Shakopee Mdewakanton Sioux Community		Shakopee Mdewakanton Sioux Community 2330 Sioux Trail NW Prior Lake MN, 55372 United States	Electronic Service		No	24-352Official
60	Brooke	Cunningham	health.review@state.mn.us	Minnesota Department of Health		PO Box 64975 St. Paul MN, 55164-0975 United States	Electronic Service		No	24-352Official
61	Stacy	Dahl	sdahl@minnkota.com	Minnkota Power Cooperative, Inc.		5301 32nd Ave S Grand Forks ND, 58201 United States	Electronic Service		No	24-352Official
62	Lorene	Damsits	lorened@cmpasgroup.org	Central MN MPA		459 S Grove St Blue Earth MN, 56013 United States	Electronic Service		No	24-352Official
63	Lisa	Daniels	lisadaniels@windustry.org	Windustry		201 Ridgewood Ave Minneapolis MN, 55403 United States	Electronic Service		No	24-352Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
64	Miyah	Danielson	miyahdanielson@fdlrez.com	Fond du Lac Band of Lake Superior Chippewa		1720 Big Lake Road Cloquet MN, 55720 United States	Electronic Service		No	24-352Official
65	Chris	Davis	christopher.davis@state.mn.us		Department of Commerce	Suite 280 85 Seventh Place East St. Paul MN, 55101-2198 United States	Electronic Service		No	24-352Official
66	Jason	Decker	jason.decker@llojibwe.net	Leech Lake Band of Ojibwe		190 Sailstar Drive NW Cass Lake MN, 56633 United States	Electronic Service		No	24-352Official
67	James	Denniston	james.r.denniston@xcelenergy.com	Xcel Energy Services, Inc.		414 Nicollet Mall, 401-8 Minneapolis MN, 55401 United States	Electronic Service		No	24-352Official
68	Bobby	Deschampe	robertdeschampe@grandportage.com	Grand Portage Band of Lake Superior Chippewa		PO Box 428 Grand Portage MN, 55605 United States	Electronic Service		No	24-352Official
69	Curt	Dieren	curt.dieren@dgr.com	L&O Power Cooperative		1302 S Union St Rock Rapids IA, 51246 United States	Electronic Service		No	24-352Official
70	Kami	Diver	kamidiver@fdlrez.com	Fond du Lac Band of Lake Superior Chippewa		1720 Big Lake Road Cloquet MN, 55720 United States	Electronic Service		No	24-352Official
71	Becky	Dobbs	bdobbs@greenergy.com			null null, null United States	Electronic Service		No	24-352Official
72	J.	Drake Hamilton	hamilton@fresh-energy.org	Fresh Energy		408 St Peter St Ste 350 Saint Paul MN, 55101 United States	Electronic Service		No	24-352Official
73	Shane	Drift	sdrift@boisforte-nsn.gov	Bois Forte Band of Chippewa		Bois Forte Tribal Government 5344 Lakeshore Drive Nett Lake MN, 55772 United States	Electronic Service		No	24-352Official
74	Adam	Duininck	aduininck@ncsrcc.org	North Central States Regional Council of Carpenters		700 Olive Street St. Paul MN, 55130 United States	Electronic Service		No	24-352Official
75	Kristin W	Duncanson	kw.duncanson@gmail.com			57746 Highway 30 Mapleton MN, 56065 United States	Electronic Service		No	24-352Official
76	Wally	Dupuis	wallydupuis@fdlband.org	Fond du Lac Band of Lake Superior Chippewa		1720 Big Lake Road Cloquet MN, 55720 United States	Electronic Service		No	24-352Official
77	Kevin	Dupuis, Sr.	kevindupuis@fdlrez.com			Reservation Business Committee 1720 Big Lake Rd Cloquet MN, 55720 United States	Electronic Service		No	24-352Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
91	Gary	Frazer	gfrazier@mnchippewatribe.org	Minnesota Chippewa Tribe		PO Box 217 Cass Lake MN, 56633 United States	Electronic Service		No	24-352Official
92	Barb	Freese	bfreese@mncenter.org	Minnesota Center for Environmental Advocacy		1919 University Ave W Ste 515 Saint Paul MN, 55104-3435 United States	Electronic Service		No	24-352Official
93	Christopher	Friez	christopher.friez@nacco.com	NACCO Natural Resources/North American Coal		918 E. Divide Ave., Suite 200 Bismarck ND, 58501 United States	Electronic Service		No	24-352Official
94	Stacey	Fujii	sfujii@grenergy.com	Great River Energy		12300 Elm Creek Boulevard Maple Grove MN, 55369-4718 United States	Electronic Service		No	24-352Official
95	Jessica	Fyhrie	jfyhrie@otpc.com	Otter Tail Power Company		PO Box 496 Fergus Falls MN, 56538-0496 United States	Electronic Service		No	24-352Official
96	Edward	Garvey	garveyed@aol.com	Residence		32 Lawton St Saint Paul MN, 55102 United States	Electronic Service		No	24-352Official
97	Benjamin	Gerber	ben@mrets.org	Midwest Renewable Energy Tracking System		60 South Sixth Street Suite 2800 Minneapolis MN, 55402 United States	Electronic Service		No	24-352Official
98	David P.	Geschwind	dp.geschwind@smmpa.org	Southern Minnesota Municipal Power Agency		500 First Avenue SW Rochester MN, 55902 United States	Electronic Service		No	24-352Official
99	Shannon	Geshick	shannon.geshick@state.mn.us	Minnesota Indian Affairs Council (MIAC)		null null, null United States	Electronic Service		No	24-352Official
100	Allen	Gleckner	gleckner@fresh-energy.org	Fresh Energy		408 St. Peter Street Ste 350 Saint Paul MN, 55102 United States	Electronic Service		No	24-352Official
101	Jenny	Glumack	jenny@mrea.org	Minnesota Rural Electric Association		11640 73rd Ave N Maple Grove MN, 55369 United States	Electronic Service		No	24-352Official
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103	Todd J.	Guerrero	todd.guerrero@kutakrock.com	Kutak Rock LLP		Suite 1750 220 South Sixth Street Minneapolis MN, 55402-1425 United States	Electronic Service		No	24-352Official
104	Tessa	Haagenson	tessa.haagenson@connexusenergy.com	Connexus Energy		14601 Ramsey Blvd NW Ramsey MN, 55303 United States	Electronic Service		No	24-352Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
105	Jeffrey	Haase	jhaase@grenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	24-352Official
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107	Jeremy	Hamilton	jhamilton@uppersiouxcommunity-nsn.gov	Upper Sioux Community		Upper Sioux Community PO Box 147 Granite Falls MN, 56241 United States	Electronic Service		No	24-352Official
108	David A.	Hansen	hansen@federatedrea.coop	Federated Rural Electric Association		77100 U.S. Highway 71 PO Box 69 Jackson MN, 56143 United States	Electronic Service		No	24-352Official
109	James	Hartson				59931 300th Street Waltham MN, 55982 United States	Paper Service		No	24-352Official
110	Amy	Hastings	amyh@uppersiouxcommunity-nsn.gov	Upper Sioux Community		5722 Travers Lane PO Box 147 Granite Falls MN, 56241 United States	Electronic Service		No	24-352Official
111	Erik	Hatlestad	erik@cureriver.org			117 1st St Montevideo MN, 56265 United States	Electronic Service		No	24-352Official
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115	Annete	Henkel	mui@mutilityinvestors.org	Minnesota Utility Investors		413 Wacouta Street #230 St.Paul MN, 55101 United States	Electronic Service		No	24-352Official
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117	Kristin	Henry	kristin.henry@sierraclub.org	Sierra Club		2101 Webster St Ste 1300 Oakland CA, 94612 United States	Electronic Service		No	24-352Official
118	Benjamin	Hertz	bhertz@bepc.com	Basin Electric Power Cooperative		1717 E Interstate Ave Bismarck ND, 58503 United States	Electronic Service		No	24-352Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
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122	Ronald	Horman	rhorman@redwoodelectric.com	Redwood Electric Cooperative		60 Pine Street Clements MN, 56224 United States	Electronic Service		No	24-352Official
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124	Robbie	Howe	robbie.howe@llojibwe.net	Leech Lake Band of Ojibwe		190 Sailstar Drive NW Cass Lake MN, 56633 United States	Electronic Service		No	24-352Official
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127	Faron	Jackson, Sr.	faron.jackson@llojibwe.net			190 Sailstar Drive NW Cass Lake MN, 56633 United States	Electronic Service		No	24-352Official
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129	Justin	Jahnz	justin.jahnz@ecemn.com	East Central Energy		412 Main Ave N Braham MN, 55006 United States	Electronic Service		No	24-352Official
130	Alan	Jenkins	aj@jenkinsatlaw.com	Jenkins at Law		2950 Yellowtail Ave. Marathon FL, 33050 United States	Electronic Service		No	24-352Official
131	Nathan	Jensen	njensen@otpc.com	Otter Tail Power Company		215 S. Cascade St. Fergus Falls MN, 56537 United States	Electronic Service		No	24-352Official
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#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
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134	Jody	Johnson	jody.johnson@piic.org	Prairie Island Indian Community		5636 Sturgeon Lake Rd Welch MN, 55089 United States	Electronic Service		No	24-352Official
135	Johnny	Johnson	johnny.johnson@piic.org	Prairie Island Indian Community		5636 Sturgeon Lake Road Welch MN, 55089 United States	Electronic Service		No	24-352Official
136	Richard	Johnson	rick.johnson@lawmoss.com	Moss & Barnett		150 S. 5th Street Suite 1200 Minneapolis MN, 55402 United States	Electronic Service		No	24-352Official
137	Sarah	Johnson Phillips	sjphillips@stoel.com	Stoel Rives LLP		33 South Sixth Street Suite 4200 Minneapolis MN, 55402 United States	Electronic Service		No	24-352Official
138	Nate	Jones	njones@hcpd.com	Heartland Consumers Power		PO Box 248 Madison SD, 57042 United States	Electronic Service		No	24-352Official
139	Nick	Kaneski	nick.kaneski@enbridge.com	Enbridge Energy Company, Inc.		11 East Superior St Ste 125 Duluth MN, 55802 United States	Electronic Service		No	24-352Official
140	Veda	Kanitz	vmkanitz@gmail.com			null null, null United States	Electronic Service		No	24-352Official
141	Jenny	Kartes	jkartes@arrowhead.coop	Arrowhead Electric Cooperative, Inc.(P)		PO Box 39 5401 W Hwy 61 Lutsen MN, 55612 United States	Electronic Service		No	24-352Official
142	David	Kempf	dkempf@greenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	24-352Official
143	William	Kenworthy	will@votesolar.org			1 South Dearborn St Ste 2000 Chicago IL, 60603 United States	Electronic Service		No	24-352Official
144	Becky	Kern	bkern@bepc.com	Basin Electric Power Cooperative		1717 E Interstate Ave Bismarck ND, 58501 United States	Electronic Service		No	24-352Official
145	Samuel B.	Ketchum	sketchum@kennedy-graven.com	Kennedy & Graven, Chartered		150 S 5th St Ste 700 Minneapolis MN, 55402 United States	Electronic Service		No	24-352Official
146	Nazir	Khan	nazir@mnejtable.org	Minnesota Environmental Justice Table		2720 E 22nd St Minneapolis MN, 55406 United States	Electronic Service		No	24-352Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
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148	Kate	Knuth	kate.knuth@gmail.com			2347 14th Terrace NW New Brighton MN, 55112 United States	Electronic Service		No	24-352Official
149	Frank	Kohlasch	frank.kohlasch@state.mn.us		Minnesota Pollution Control Agency	520 Lafayette Rd N. St. Paul MN, 55155 United States	Electronic Service		No	24-352Official
150	Brian	Kolbinger	brian@beckertownship.org	Becker Township Board		PO Box 248 12165 Hancock St Becker MN, 55308 United States	Electronic Service		No	24-352Official
151	Seth	Koneczny	st.koneczny@smmpa.org	SMMPA		500 First Avenue, SW Rochester MN, 55902-3303 United States	Electronic Service		No	24-352Official
152	Brian	Krambeer	bkrambeer@mienergy.coop	MiEnergy Cooperative		PO Box 626 31110 Cooperative Way Rushford MN, 55971 United States	Electronic Service		No	24-352Official
153	Randy	Kramer	rlkramer89@gmail.com	Water and Soil Resources Board		42808 Co. Rd. 11 Bird Island MN, 55310 United States	Electronic Service		No	24-352Official
154	Allen	Krug	allen.krug@xcelenergy.com	Xcel Energy		414 Nicollet Mall-7th fl Minneapolis MN, 55401 United States	Electronic Service		No	24-352Official
155	Kay	Kuhlmann	teri.swanson@ci.red-wing.mn.us	City Of Red Wing		315 West Fourth Street Red Wing MN, 55066 United States	Electronic Service		No	24-352Official
156	Brenda	Kyle	bkyle@stpaulchamber.com	St. Paul Area Chamber of Commerce		401 N Robert Street Suite 150 St Paul MN, 55101 United States	Electronic Service		No	24-352Official
157	Therese	LaCanne	tlacanne@grenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	24-352Official
158	Matthew	Lacey	mlacey@grenergy.com	Great River Energy		12300 Elm Creek Boulevard Maple Grove MN, 55369-4718 United States	Electronic Service		No	24-352Official
159	Becky	Lammi	cityclerk@ci.aurora.mn.us	City of Aurora		16 W 2nd Ave N PO Box 160 Aurora MN, 55705 United States	Electronic Service		No	24-352Official
160	Carmel	Laney	carmel.laney@stoel.com	Stoel Rives LLP		33 South Sixth Street Suite 4200 Minneapolis	Electronic Service		No	24-352Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
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162	Robert L	Larsen	robert.larsen@lowersioux.com	Lower Sioux Indian Community		PO Box 308 39527 Reservation Highway 1 Morton MN, 56270 United States	Electronic Service		No	24-352Official
163	Emily	Larson	elarson@duluthmn.gov	City of Duluth		411 W 1st St Rm 403 Duluth MN, 55802 United States	Electronic Service		No	24-352Official
164	James D.	Larson	james.larson@avantenergy.com	Avant Energy Services		220 S 6th St Ste 1300 Minneapolis MN, 55402 United States	Electronic Service		No	24-352Official
165	Mark	Larson	mlarson@meeker.coop	Meeker Coop Light & Power Assn		1725 Highway 12 E Ste 100 Litchfield MN, 55355 United States	Electronic Service		No	24-352Official
166	Peder	Larson	plarson@larkinhoffman.com	Larkin Hoffman Daly & Lindgren, Ltd.		8300 Norman Center Drive Suite 1000 Bloomington MN, 55437 United States	Electronic Service		No	24-352Official
167	Rachel	Leonard	rachel.leonard@ci.monticello.mn.us	City of Monticello		505 Walnut St Ste 1 Monticello MN, 55362 United States	Electronic Service		No	24-352Official
168	Dan	Leshner	dlesher@greenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	24-352Official
169	Annie	Levenson Falk	annielf@cubminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota Street, Suite W1360 St. Paul MN, 55101 United States	Electronic Service		No	24-352Official
170	Jesse	Levine	jesse_levine@afandpa.org			1101 K St NW Suite 700 Washington DC, 20005 United States	Electronic Service		No	24-352Official
171	Amy	Liberkowsky	amy.a.liberkowsky@xcelenergy.com	Xcel Energy		414 Nicollet Mall 7th Floor Minneapolis MN, 55401-1993 United States	Electronic Service		No	24-352Official
172	Eric	Lindberg	elindberg@mncenter.org	Minnesota Center for Environmental Advocacy		1919 University Avenue West Suite 515 Saint Paul MN, 55104-3435 United States	Electronic Service		No	24-352Official
173	Eric	Lipman	eric.lipman@state.mn.us		Office of Administrative Hearings	PO Box 64620 St. Paul MN, 55164-0620 United States	Electronic Service		Yes	24-352Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
174	Michelle	Lommel	mlommel@greenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	24-352Official
175	Bob	Long	rlong@larkinhoffman.com	Larkin Hoffman (Silicon Energy)		1500 Wells Fargo Plaza 7900 Xerxes Ave S Bloomington MN, 55431 United States	Electronic Service		No	24-352Official
176	Nicole	Luckey	nluckey@invenergyllc.com	Invenergy LLC		1 S. Wacker Suite 1800 Chicago IL, 60606 United States	Electronic Service		No	24-352Official
177	Susan	Ludwig	sludwig@mnpower.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	24-352Official
178	Robert	Lunder	robert.lunder@mdu.com	Montana-Dakota Utilities (ET)		400 N 4th St Bismark ND, 58501 United States	Electronic Service		No	24-352Official
179	Alice	Madden	alice@communitypowermn.org	Community Power		2720 E 22nd St Minneapolis MN, 55406 United States	Electronic Service		No	24-352Official
180	Scott	Magnuson	smagnuson@bpu.org	Brainerd Public Utilities		8027 Highland Scenic Rd Baxter MN, 56425 United States	Electronic Service		No	24-352Official
181	Kavita	Maini	kmaini@wi.rr.com	KM Energy Consulting, LLC		961 N Lost Woods Rd Oconomowoc WI, 53066 United States	Electronic Service		No	24-352Official
182	Emily	Marshall	emarshall@jourismarshall.com	Miller O'Brien Jensen, PA		120 S. 6th Street Suite 2400 Minneapolis MN, 55402 United States	Electronic Service		No	24-352Official
183	Mary	Martinka	mary.a.martinka@xcelenergy.com	Xcel Energy Inc		414 Nicollet Mall 7th Floor Minneapolis MN, 55401 United States	Electronic Service		No	24-352Official
184	Gregg	Mast	gmast@cleanenergyeconomymn.org	Clean Energy Economy Minnesota		4808 10th Avenue S Minneapolis MN, 55417 United States	Electronic Service		No	24-352Official
185	Shena	Matrious	shena.matrious@millelacsband.com	Mille Lacs Band of Ojibwe		43408 Oodena Drive Onamia MN, 56349 United States	Electronic Service		No	24-352Official
186	Daryl	Maxwell	dmaxwell@hydro.mb.ca	Manitoba Hydro		360 Portage Ave FL 16 PO Box 815, Station Main Winnipeg MB, R3C 2P4 Canada	Electronic Service		No	24-352Official
187	Tim	McCarthy	tim.mccarthy@siouxvalleyenergy.com	Sioux Valley Southwestern Electric Cooperative,		null null, null United States	Electronic Service		No	24-352Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
				Inc. d/b/a Sioux Valley Energy						
188	Scot	McClure	scotmcclure@alliantenergy.com	Interstate Power And Light Company		4902 N Biltmore Ln PO Box 77007 Madison WI, 53707-1007 United States	Electronic Service		No	24-352Official
189	April	McCormick	aprilm@grandportage.com	Grand Portage Band of Lake Superior Chippewa		PO Box 428 Grand Portage MN, 55605 United States	Electronic Service		No	24-352Official
190	Jess	McCullough	jmccullough@mnpower.com	Minnesota Power		30 W Superior St Duluth MN, 55802 United States	Electronic Service		No	24-352Official
191	Sara G	McGrane	smcgrane@felhaber.com	Felhaber Larson		220 S 6th St Ste 2200 Minneapolis MN, 55420 United States	Electronic Service		No	24-352Official
192	Natalie	McIntire	natalie.mcintire@gmail.com	Wind on the Wires		570 Asbury St Ste 201 Saint Paul MN, 55104-1850 United States	Electronic Service		No	24-352Official
193	Harvey	McMahon	hcmahon@otpc.com	Otter Tail Power Company		215 South Cascade Street Fergus Falls MN, 56537 United States	Electronic Service		No	24-352Official
194	Taylor	McNair	taylor@gridlab.org			668 Capp Street San Francisco CA, 94110 United States	Electronic Service		No	24-352Official
195	Ronald	Meier	rmeier@mcleodcoop.com	Mcleod Cooperative Power		3515 11th St East Glencoe MN, 55336 United States	Electronic Service		No	24-352Official
196	Melanie	Mesko Lee	melanie.lee@burnsvillemn.gov	City of Burnsville		100 Civic Center Parkway Burnsville MN, 55337-3867 United States	Electronic Service		No	24-352Official
197	Peder	Mewis	pmewis@cleangridalliance.org	Clean Grid Alliance		570 Asbury St. St. Paul MN, 55104 United States	Electronic Service		No	24-352Official
198	Joseph	Meyer	joseph.meyer@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	Bremer Tower, Suite 1400 445 Minnesota Street St Paul MN, 55101-2131 United States	Electronic Service		No	24-352Official
199	Valentina	Mgeni	valentina.mgeni@piic.org	Prairie Island Indian Community		Prairie Island Indian Community 5636 Sturgeon Lake Road Welch MN, 55089 United States	Electronic Service		No	24-352Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
200	Cole W.	Miller	cole.miller@shakopeedakota.org	Shakopee Mdewakanton Sioux Community		Shakopee Mdewakanton Sioux Community 2330 Sioux Trail NW Prior Lake MN, 55372 United States	Electronic Service		No	24-352Official
201	Stacy	Miller	stacy.miller@minneapolismn.gov	City of Minneapolis		350 S. 5th Street Room M 301 Minneapolis MN, 55415 United States	Electronic Service		No	24-352Official
202	David	Moeller	dmoeller@allte.com	Minnesota Power			Electronic Service		No	24-352Official
203	Dalene	Monsebroten	dalene.monsebroten@nmpagency.com	Northern Municipal Power Agency		123 2nd St W Thief River Falls MN, 56701 United States	Electronic Service		No	24-352Official
204	Sarah	Mooradian	sarah@curemn.org	CURE		117 South 1st Street Montevideo MN, 56265 United States	Electronic Service		No	24-352Official
205	Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP		33 South Sixth St Ste 4200 Minneapolis MN, 55402 United States	Electronic Service		No	24-352Official
206	Travis	Morrision	travis.morrison@boisforte-nsn.gov	Bois Forte Band of Chippewa		Bois Forte Tribal Government 5344 Lakeshore Drive Nett Lake MN, 55772 United States	Electronic Service		No	24-352Official
207	David	Morrison, Sr.	david.morrison@boisforte-nsn.gov	Bois Forte Band of Chippewa		Bois Forte Tribal Government 5344 Lakeshore Drive Nett Lake MN, 55772 United States	Electronic Service		No	24-352Official
208	Evan	Mulholland	emulholland@mncenter.org	Minnesota Center for Environmental Advocacy		1919 University Ave W Ste 515 Saint Paul MN, 55101 United States	Electronic Service		No	24-352Official
209	Alan	Muller	alan@greendel.org	Energy & Environmental Consulting		1110 West Avenue Red Wing MN, 55066 United States	Electronic Service		No	24-352Official
210	Sonny	Myers	smyers@1854treatyauthority.org	1854 Treaty Authority		4428 Haines Rd Duluth MN, 55811-1524 United States	Electronic Service		No	24-352Official
211	Ben	Nelson	benn@cmpasgroup.org	CMPMA		459 South Grove Street Blue Earth MN, 56013 United States	Electronic Service		No	24-352Official
212	Carl	Nelson	cnelson@mncee.org	Center for Energy and Environment		212 3rd Ave N Ste 560 Minneapolis MN, 55401 United States	Electronic Service		No	24-352Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
213	Deb	Nelson	dnelson@grenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	24-352Official
214	David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency		220 South Sixth Street Suite 1300 Minneapolis MN, 55402 United States	Electronic Service		No	24-352Official
215	Duane	Ninneman	duane@cureriver.org	Clean Up the River Environment		117 South 1st St Montevideo MN, 56265 United States	Electronic Service		No	24-352Official
216	Michael	Noble	noble@fresh-energy.org	Fresh Energy		408 Saint Peter St Ste 350 Saint Paul MN, 55102 United States	Electronic Service		No	24-352Official
217	Rolf	Nordstrom	rnordstrom@gpsd.net	Great Plains Institute		2801 21ST AVE S STE 220 Minneapolis MN, 55407-1229 United States	Electronic Service		No	24-352Official
218	Samantha	Norris	samanthanorris@alliantenergy.com	Interstate Power and Light Company		200 1st Street SE PO Box 351 Cedar Rapids IA, 52406-0351 United States	Electronic Service		No	24-352Official
219	M. William	O'Brien	bobrien@mojlaw.com	Miller O'Brien Jensen, P.A.		120 S 6th St Ste 2400 Minneapolis MN, 55402 United States	Electronic Service		No	24-352Official
220	Ric	O'Connell	ric@gridlab.org	GridLab		2120 University Ave Berkeley CA, 94704 United States	Electronic Service		No	24-352Official
221	Joseph	OBrien	joey.obrien@lowersioux.com			39527 Highway 1 Morton MN, 56270 United States	Electronic Service		No	24-352Official
222	Matthew	Olsen	molsen@otpc.com	Otter Tail Power Company		215 South Cascade Street Fergus Falls MN, 56537 United States	Electronic Service		No	24-352Official
223	Russell	Olson	rolson@hcpd.com	Heartland Consumers Power District		PO Box 248 Madison SD, 57042-0248 United States	Electronic Service		No	24-352Official
224	Debra	Opatz	dopatz@otpc.com	Otter Tail Power Company		215 South Cascade Street Fergus Falls MN, 56537 United States	Electronic Service		No	24-352Official
225	Mikayla	Osterman	mosterman@otpc.com	Otter Tail Power Company		215 S Cascade St PO Box 496 Fergus Falls MN, 56537 United States	Electronic Service		No	24-352Official
226	Jamie	Overgaard	jovergaard@minnkota.com	Minnkota Power Cooperative, Inc.		5301 32nd Ave S Grand Forks	Electronic Service		No	24-352Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						ND, 58201 United States				
227	Carol A.	Overland	overland@legalelectric.org	Legalelectric - Overland Law Office		1110 West Avenue Red Wing MN, 55066 United States	Electronic Service		No	24-352Official
228	Gregory	Padden	gpadden@grenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	24-352Official
229	Jessica	Palmer Denig	jessica.palmer-denig@state.mn.us		Office of Administrative Hearings	600 Robert St N PO Box 64620 St. Paul MN, 55164 United States	Electronic Service		No	24-352Official
230	Marsha	Parlow	mparlow@grenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	24-352Official
231	Priti	Patel	ppatel@grenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369-4718 United States	Electronic Service		No	24-352Official
232	Gerad	Paul	gpaul@minnkota.com	Minnkota Power Cooperative		5301 32nd Ave S Grand Forks ND, 58201 United States	Electronic Service		No	24-352Official
233	Earl	Pendleton	earl.pendleton@lowersioux.com	Lower Sioux Indian Community		39527 Highway 1 Morton MN, 56270 United States	Electronic Service		No	24-352Official
234	Mary Beth	Peranteau	mperanteau@fredlaw.com	Fredrikson & Byron, P.A.		44 East Mifflin Street Suite 1000 Madison WI, 53703 United States	Electronic Service		No	24-352Official
235	Thom	Petersen	thom.petersen@state.mn.us		Minnesota Department of Agriculture	625 North Robert St Saint Paul MN, 55155 United States	Electronic Service		No	24-352Official
236	Luke	Peterson	luke.peterson@hpuc.com	Hibbing Public Utilities Commission		1902 Sixth Ave E Hibbing MN, 55746 United States	Electronic Service		No	24-352Official
237	Neil	Peterson	info@nclucb.org	Northern Counties Land Use Coordinating Board		null null, null United States	Electronic Service		No	24-352Official
238	Gordon	Pietsch	gpietsch@grenergy.com	Great River Energy		12300 Elm Creek Blvd. Maple Grove MN, 55369-4718 United States	Electronic Service		No	24-352Official
239	Joe	Plumer	joe.plumer@redlakenation.org	Red Lake Nation		15484 Migizi Drive Red Lake MN, 56671 United States	Electronic Service		No	24-352Official
240	Kaci	Poor	kwp@floomenergylaw.com	Floom Energy Law PLLC		3100 Clarendon Blvd. Suite 920	Electronic Service		No	24-352Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						Arlington VA, 22201 United States				
241	J.	Porter	greg.porter@nngco.com	Northern Natural Gas Company		1111 South 103rd St Omaha NE, 68124 United States	Electronic Service		No	24-352Official
242	Kevin	Pranis	kpranis@liunagroc.com	Laborers' District Council of MN and ND		81 E Little Canada Road St. Paul MN, 55117 United States	Electronic Service		No	24-352Official
243	Robert	Prescott	bob.prescott@lowersioux.com	Lower Sioux Indian Community		39527 Highway 1 Morton MN, 56270 United States	Electronic Service		No	24-352Official
244	David	Raatz	draatz@bepc.com	Basin Electric Power Cooperative		1717 East Interstate Avenue Bismarck ND, 58501 United States	Electronic Service		No	24-352Official
245	John C.	Reinhardt		Laura A. Reinhardt		3552 26th Ave S Minneapolis MN, 55406 United States	Paper Service		No	24-352Official
246	Victoria	Reinhardt	victoria.reinhardt@co.ramsey.mn.us	Partnership on Waste and Energy		Ramsey County Board Office 15 W. Kellogg Blvd., Ste. 220 St. Paul MN, 55102 United States	Electronic Service		No	24-352Official
247	Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	1400 BRM Tower 445 Minnesota St St. Paul MN, 55101-2131 United States	Electronic Service		Yes	24-352Official
248	Kevin	Reuther	kreuther@mncenter.org	MN Center for Environmental Advocacy		26 E Exchange St, Ste 206 St. Paul MN, 55101-1667 United States	Electronic Service		No	24-352Official
249	John	Richards	johnrichards@nweco.com	Northwestern Wisconsin Electric Company		104 S. Pine St. Grantsburg WI, 54840 United States	Electronic Service		No	24-352Official
250	Susan	Romans	sromans@allte.com	Minnesota Power		30 West Superior Street Legal Dept Duluth MN, 55802 United States	Electronic Service		No	24-352Official
251	Stephan	Roos	stephan.roos@state.mn.us		Minnesota Department of Agriculture	625 Robert St N Saint Paul MN, 55155-2538 United States	Electronic Service		No	24-352Official
252	Alan	Roy	alan.roy@whiteearth-nsn.gov	White Earth Nation		White Earth Tribal Headquarters 35500 Eagle View Road Ogema MN, 56569 United States	Electronic Service		No	24-352Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
266	Robert H.	Schulte	rhs@schulteassociates.com	Schulte Associates LLC		1742 Patriot Rd Northfield MN, 55057 United States	Electronic Service		No	24-352Official
267	J.P.	Schumacher	jps@mrenergy.com	Missouri River Energy Services		null null, null United States	Electronic Service		No	24-352Official
268	Kevin	Schumacher	kevin@mrets.org	Midwest Renewable Energy Tracking System		null null, null United States	Electronic Service		No	24-352Official
269	Ronald J.	Schwartau	rschwartau@noblesce.com	Nobles Electric Cooperative		22636 U.S. Hwy. 59 Worthington MN, 56187 United States	Electronic Service		No	24-352Official
270	Christine	Schwartz	regulatory.records@xcelenergy.com	Xcel Energy		414 Nicollet Mall, MN1180-07-MCA Minneapolis MN, 55401-1993 United States	Electronic Service		No	24-352Official
271	Douglas	Seaton	doug.seaton@umwlc.org	Upper Midwest Law Center		8421 Wayzata Blvd Ste 300 Golden Valley MN, 55426 United States	Electronic Service		No	24-352Official
272	Dean	Sedgwick	sedgwick@itascapower.com	Itasca Power Company		PO Box 455 Spring Lake MN, 56680 United States	Electronic Service		No	24-352Official
273	Jessie	Seim	jessie.seim@piic.org	Prairie Island Indian Community		5636 Sturgeon Lake Rd Welch MN, 55089 United States	Electronic Service		No	24-352Official
274	Darrell	Seki, Sr.	dseki@redlakenation.org			15484 Migizi Drive Red Lake MN, 56671 United States	Electronic Service		No	24-352Official
275	Will	Seuffert	will.seuffert@state.mn.us		Public Utilities Commission	121 7th PI E Ste 350 Saint Paul MN, 55101 United States	Electronic Service		Yes	24-352Official
276	Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates		7400 Lyndale Ave S Ste 190 Richfield MN, 55423 United States	Electronic Service		No	24-352Official
277	Bria	Shea	bria.e.shea@xcelenergy.com	Xcel Energy		414 Nicollet Mall Minneapolis MN, 55401 United States	Electronic Service		No	24-352Official
278	Andrew R.	Shedlock	andrew.shedlock@kutakrock.com	Kutak Rock LLP		60 South Sixth St Ste 3400 Minneapolis MN, 55402-4018 United States	Electronic Service		No	24-352Official
279	Doug	Shoemaker	dougs@charter.net	Minnesota Renewable Energy		2928 5th Ave S Minneapolis MN, 55408 United States	Electronic Service		No	24-352Official
280	Beth	Smith	bsmith@greatermankato.com	Greater Mankato Growth		1961 Premier Dr Ste 100 Mankato MN,	Electronic Service		No	24-352Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						56001 United States				
281	Joel	Smith	jsmith@mnchippewatribe.org	Minnesota Chippewa Tribe		PO Box 217 Cass Lake MN, 56633 United States	Electronic Service		No	24-352Official
282	Joshua	Smith	joshua.smith@sierraclub.org			85 Second St FL 2 San Francisco CA, 94105 United States	Electronic Service		No	24-352Official
283	Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.		76 W Kellogg Blvd St. Paul MN, 55102 United States	Electronic Service		No	24-352Official
284	Nizhoni	Smith	nizhoni.smith@lowersioux.com	Lower Sioux Indian Community		PO Box 308 39527 Reservation Highway 1 Morton MN, 56270 United States	Electronic Service		No	24-352Official
285	Trevor	Smith	trevor.smith@avantenergy.com	Avant Energy, Inc.		220 South Sixth Street Suite 1300 Minneapolis MN, 55402 United States	Electronic Service		No	24-352Official
286	Roger	Smith, Sr.	rogermsmithsr@fdlrez.com			1720 Big Lake Road Cloquet MN, 55720 United States	Electronic Service		No	24-352Official
287	Beth	Soholt	bsoholt@cleangridalliance.org	Clean Grid Alliance		570 Asbury Street Suite 201 St. Paul MN, 55104 United States	Electronic Service		No	24-352Official
288	Anna	Sommer	asommer@energyfuturesgroup.com	Energy Futures Group		PO Box 692 Canton NY, 13617 United States	Electronic Service		No	24-352Official
289	Marie	Spry	mariespry@grandportage.com			PO Box 428 Grand Portage MN, 55605 United States	Electronic Service		No	24-352Official
290	Mark	Spurr	mspurr@fvbenergy.com	International District Energy Association		222 South Ninth St., Suite 825 Minneapolis MN, 55402 United States	Electronic Service		No	24-352Official
291	LeRoy	Staples Fairbanks III	leroy.fairbanks@llojibwe.net	Leech Lake Band of Ojibwe		190 Sailstar Drive NW Cass Lake MN, 56633 United States	Electronic Service		No	24-352Official
292	Russ	Stark	russ.stark@ci.stpaul.mn.us	City of St. Paul		Mayor's Office 15 W. Kellogg Blvd., Suite 390 Saint Paul MN, 55102 United States	Electronic Service		No	24-352Official
293	Byron E.	Starns	byron.starns@stinson.com	STINSON LLP		50 S 6th St Ste 2600 Minneapolis MN, 55402 United States	Electronic Service		No	24-352Official
294	Cary	Stephenson	cstephenson@otpc.com	Otter Tail Power Company		215 South Cascade Street Fergus Falls	Electronic Service		No	24-352Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						MN, 56537 United States				
295	Mark	Strohfus	mstrohfus@grenergy.com	Great River Energy		12300 Elm Creek Boulevard Maple Grove MN, 55369-4718 United States	Electronic Service		No	24-352Official
296	James M	Strommen	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered		150 S 5th St Ste 700 Minneapolis MN, 55402 United States	Electronic Service		No	24-352Official
297	Samuel	Strong	sam.strong@redlakenation.org	Red Lake Nation		15484 Migizi Drive Red Lake MN, 56671 United States	Electronic Service		No	24-352Official
298	Kent	Sulem	ksulem@mmua.org			3131 Fernbrook Ln N Ste 200 Plymouth MN, 55447-5337 United States	Electronic Service		No	24-352Official
299	Timothy	Sullivan	tsullivan@whe.org	Wright Hennepin Coop. Electric Assn.		6800 Electric Drive PO Box 330 Rockford MN, 55373 United States	Electronic Service		No	24-352Official
300	David	Sunderman	daves@benco.org	BENCO (DUPLICATE)		PO Box 8 Mankato MN, 56002-0008 United States	Electronic Service		No	24-352Official
301	Randy	Synsteliën	rsynsteliën@otpc.com	Otter Tail Power Company		215 S Cascade St Fergus Falls MN, 56537 United States	Electronic Service		No	24-352Official
302	Camille	Tanhoff	kamip@uppersiouxcommunity-nsn.gov	Upper Sioux Community		5722 Travers Lane PO BOX 147 Granite Falls MN, 56241 United States	Electronic Service		No	24-352Official
303	Mikayala	Thompson	mmthompson@otpc.com	Otter Tail Power Company		null null, null United States	Electronic Service		No	24-352Official
304	Tim	Thompson	tthompson@lrec.coop	Lake Region Electric Cooperative		PO Box 643 1401 South Broadway Pelican Rapids MN, 56572 United States	Electronic Service		No	24-352Official
305	Stuart	Tommerdahl	stommerdahl@otpc.com	Otter Tail Power Company		215 S Cascade St PO Box 496 Fergus Falls MN, 56537 United States	Electronic Service		No	24-352Official
306	Pat	Treseler	pat.jcplaw@comcast.net	Paulson Law Office LTD		4445 W 77th Street Suite 224 Edina MN, 55435 United States	Electronic Service		No	24-352Official
307	Lise	Trudeau	lise.trudeau@state.mn.us		Department of Commerce	85 7th Place East Suite 500 Saint Paul MN, 55101 United States	Electronic Service		No	24-352Official
308	Caralyn	Trutna	carrie@uppersiouxcommunity-nsn.gov	Upper Sioux Community		Upper Sioux Community	Electronic Service		No	24-352Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						P.O. Box 147 Granite Falls MN, 55372 United States				
309	Jackie	Van Norman	jvannorman@grenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	24-352Official
310	Analeisha	Vang	avang@mnpower.com			30 W Superior St Duluth MN, 55802-2093 United States	Electronic Service		No	24-352Official
311	Adrian	Varga	avarga@actcommodities.com	ACT Commodities		437 Madison Ave New York City NY, 10022 United States	Electronic Service		No	24-352Official
312	Sam	Villella	sdvillella@gmail.com			10534 Alamo Street NE Blaine MN, 55449 United States	Electronic Service		No	24-352Official
313	Julie	Voeck	julie.voeck@nee.com	NextEra Energy Resources, LLC		700 Universe Blvd Juno Beach FL, 33408 United States	Electronic Service		No	24-352Official
314	Amelia	Vohs	avohs@mncenter.org	Minnesota Center for Environmental Advocacy		1919 University Avenue West Suite 515 St. Paul MN, 55104 United States	Electronic Service		No	24-352Official
315	Michael	Volker	mvolker@eastriver.coop	East River Electric Power Coop		211 S. Harth Ave Madison SD, 57042 United States	Electronic Service		No	24-352Official
316	Toni	Volkmeier	toni.volkmeier@state.mn.us	MPCA		520 Lafayette Rd. N. St. Paul MN, 55155 United States	Electronic Service		No	24-352Official
317	Trent	Waite	twaite@grenergy.com			null null, null United States	Electronic Service		No	24-352Official
318	Laurance R	Waldoch	larrywaldoch@gmail.com	Attorney		2597 Parkview Dr Saint Paul MN, 55110 United States	Electronic Service		No	24-352Official
319	Greg	Wannier	greg.wannier@sierraclub.org	Sierra Club		2101 Webster St Ste 1300 Oakland CA, 94612 United States	Electronic Service		No	24-352Official
320	Roger	Warehime	roger.warehime@owatonnautilities.com	Owatonna Municipal Public Utilities - Gas		208 S Walnut Ave PO BOX 800 Owatonna MN, 55060 United States	Electronic Service		No	24-352Official
321	Cynthia	Warzecha	cynthia.warzecha@state.mn.us	Minnesota Department of Natural Resources		500 Lafayette Road Box 25 St. Paul MN, 55155-4040 United States	Electronic Service		No	24-352Official
322	Carol	Westergard	cwestergard@otpc.com	Otter Tail Power Company		215 S Cascade St Fergus Falls MN, 56537 United States	Electronic Service		No	24-352Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
323	Heather	Westra	heather.westra@piic.org	Prairie Island Indian Community		5636 Sturgeon Lake Rd Welch MN, 55089 United States	Electronic Service		No	24-352Official
324	Paul	White	paul.white@prcwind.com	Project Resources Corp./Tamarac Line LLC/Ridgewind		618 2nd Ave SE Minneapolis MN, 55414 United States	Electronic Service		No	24-352Official
325	Steve	White	steve.white@llojbwe.net	Leech Lake Band of Ojibwe		190 Sailstar Drive NW Cass Lake MN, 56633 United States	Electronic Service		No	24-352Official
326	Cody	Whitebear	cody.whitebear@piic.org	Prairie Island Indian Community		5636 Sturgeon Lake Road Welch MN, 55089 United States	Electronic Service		No	24-352Official
327	John	Williams	jwilliams@grenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	24-352Official
328	Laurie	Williams	laurie.williams@sierraclub.org	Sierra Club		Environmental Law Program 1536 Wynkoop St Ste 200 Denver CO, 80202 United States	Electronic Service		No	24-352Official
329	Virgil	Wind	virgil.wind@millelacsband.com	Mille Lacs Band of Ojibwe		43408 Oodena Drive Onamia MN, 56359 United States	Electronic Service		No	24-352Official
330	Joseph	Windler	jwindler@winthrop.com	Winthrop & Weinstine		225 South Sixth Street, Suite 3500 Minneapolis MN, 55402 United States	Electronic Service		No	24-352Official
331	Robyn	Woeste	robynwoeste@alliantenergy.com	Interstate Power and Light Company		200 First St SE Cedar Rapids IA, 52401 United States	Electronic Service		No	24-352Official
332	Sara	Wolff	sara@mnipl.org			710 Linwood Avenue St Paul MN, 55105 United States	Electronic Service		No	24-352Official
333	Tim	Wulling	t.wulling@earthlink.net			1495 Raymond Ave. Saint Paul MN, 55108 United States	Electronic Service		No	24-352Official
334	Laurie	York	laurie.york@whiteearth-nsn.gov	White Earth Reservation Business Committee		PO Box 418 White Earth MN, 56591 United States	Electronic Service		No	24-352Official
335	Kurt	Zimmerman	kwz@ibew160.org	Local Union #160, IBEW		2909 Anthony Ln St Anthony Village MN, 55418-3238 United States	Electronic Service		No	24-352Official
336	Emily	Ziring	eziring@stlouispark.org	City of St. Louis Park		5005 Minnetonka Blvd St. Louis Park	Electronic Service		No	24-352Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						MN, 55416 United States				
337	Patrick	Zomer	pat.zomer@lawmoss.com	Moss & Barnett PA		150 S 5th St #1200 Minneapolis MN, 55402 United States	Electronic Service		No	24- 352Official