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January 29, 2025

—Via Electronic Filing—

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

RE: COMMENTS  
IMPLEMENTING CHANGES TO THE RES AND THE NEWLY CREATED CFS  
DOCKET NO. E999/CI-23-151

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 October 31, 2024 Notice of Comment Period and Updated Timeline regarding implementation of the Carbon Free Standard (CFS).

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](mailto:patricia.b.leaf@xcelenergy.com) or me at [bria.e.shea@xcelenergy.com](mailto:bria.e.shea@xcelenergy.com) if you have any questions regarding this filing.

Sincerely,

/s/

BRIA E. SHEA  
REGIONAL VICE PRESIDENT, REGULATORY POLICY

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cc: Service List

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BEFORE THE  
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Hwikwon Ham  
Joseph K. Sullivan  
John A. Tuma

Chair  
Commissioner  
Commissioner  
Commissioner

IN THE MATTER OF AN INVESTIGATION  
INTO IMPLEMENTING CHANGES TO THE  
RENEWABLE ENERGY STANDARD AND  
THE NEWLY CREATED CARBON FREE  
STANDARD UNDER MINN. STAT. §  
216B.1691

DOCKET NO. E999/CI-23-151

**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 October 31, 2024 Notice of Comment Period and Updated Timeline seeking comments on five topics:

1. When and how should utilities report preparedness for meeting upcoming CFS requirements?
2. By which criteria and standards should the Commission measure an electric utility's compliance with the CFS?
3. What considerations should the Commission take into account regarding the double counting of Renewable Energy Credits (RECs) to meet multiple requirements?
4. How should net market purchases be counted towards CFS compliance?
5. Are there other issues or concerns related to this matter?

As discussed in these Comments, we believe preparedness for the carbon free standard should be demonstrated in utility integrated resource plans (IRP), comparing the utility's Minnesota-allocated carbon-free (CF) generation to its Minnesota electric retail sales; below we offer the calculation we used in our most recent IRP. With respect to CFS compliance, we propose the Commission establish a methodology that uses a process similar to the one that has been used for many years to demonstrate Renewable Energy Standard (RES) – now the Eligible Energy Technology Standard (EETS) – compliance. Our proposed process relies on the REC compliance

methodology in Minn. Stat. § 216B.1691, subd. 4 as its foundation, with modifications to account for non-REC eligible CF generation, the inclusion of technologies that result in partial CF generation – even if they do not achieve 100 percent CF due to cost or technical limitations – and inclusion of CF energy generated from a mixture of CF/EETS and non-CF/non-REC eligible resources.

## COMMENTS

### I. PREPAREDNESS REPORTING

In 2023, the Minnesota Legislature amended Minn. Stat. § 216B.1691 to create a new CF energy standard (see Minn. Laws 2023, ch. 7). The legislation requires electric utilities to generate or procure CF energy equivalent to 100 percent of their Minnesota retail sales by 2040, with interim CF standards of 80 percent by 2030 and 90 percent by 2035.

Minn. Stat. § 216B.1691 subd. 3 requires that

... Each electric utility shall report on its plans, activities, and *progress with regard to the standard obligations* under this section in its filings under section 216B.2422 or in a separate report submitted to the commission every two years, whichever is more frequent, demonstrating to the commission the utility's effort to comply with this section...<sup>1</sup> [Emphasis added]

Minn. Stat. § 216B.2422 is the statute governing the filing of integrated resource plans by Minnesota utilities.<sup>2</sup> Accordingly, the Company addressed our preparedness to meet the requirements of the Carbon Free Standard (CFS) in its 2024-2040 Upper Midwest Integrated Resource Plan (IRP), filed February 1, 2024. “Preparedness” does not mean compliance, which we address in Section II. It merely means a utility has demonstrated in its IRP sufficient forecasted CF generation and/or long-term power purchases to meet the required CF percentages as compared to its forecasted retail sales in the year indicated. Compliance, in contrast, is a backward-looking demonstration. As part of our IRP, we compared our Minnesota-allocated CF generation to our forecast of Minnesota electric retail sales as noted in the following table.<sup>3</sup>

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<sup>1</sup> See Minn. Stat. § [216B.1691](#), subd. 3.

<sup>2</sup> See Minn. Stat. § 216B.2422.

<sup>3</sup> Docket No. E002/RP-24-67 2024-2040 Upper Midwest Integrated Resource Plan Appendices A Through N Corrected (February 2, 2024) eDocket No. 20242-203057-01 (IRP Docket.)

**Table 1: 2024 Preferred Plan Carbon-Free Energy<sup>4</sup>**

	2030	2035	2040
Total Carbon-Free Generation (GWh)	46,515	52,681	60,162
MN Allocated CF Generation (GWh)	35,644	40,668	46,666
MN Electric Retail Sales (GWh)	37,725	39,668	44,624
Carbon Free Standard Requirement	80%	90%	100%

We propose the Commission evaluate utilities' preparedness to meet the CFS requirements in the same way, as follows:<sup>5</sup>

Minnesota share of forecasted CF owned generation and PPAs

*Divided by*

Forecasted Minnesota electric retail sales

*Equals*

Percentage of Minnesota retail sales supplied by CF resources

Applying this formula, if the percentage meets or exceeds the CFS target for a given compliance year, the utility has demonstrated its preparedness to meet the CFS requirements. This approach is consistent with utilities' existing biennial reporting to the Commission under the same statute for the EETS.<sup>6</sup>

## II. CRITERIA AND STANDARDS FOR MEASURING COMPLIANCE

### A. Existing Methodology for Demonstrating Compliance with EETS

After Minnesota's RES was established in 2007, the Commission put in place a system for tracking compliance with the RES – now EETS -- using RECs in accordance with Minn. Stat. § 216B.1691, subd. 4:

Subd. 4. **Renewable energy credits.** (a) To facilitate compliance with this section, the commission, by rule or order, shall establish by January 1, 2008, a program for tradable renewable energy credits for electricity generated by eligible energy technology. The credits must represent energy produced by an eligible energy technology, as defined in subdivision 1. Each kilowatt-hour of renewable energy credits must be treated the same as a kilowatt-hour of eligible energy technology

<sup>4</sup> Xcel Energy IRP, Reproduced Table N-1, Docket No. E002/RP-24-67 (February 1, 2024).

<sup>5</sup> A utility's latest IRP forecast of total generation and energy purchased through long-term power purchase agreements (PPA) from CF sources, divided by the utility's latest IRP forecast of Minnesota electric retail sales, would yield the percentage of retail sales supplied by CF resources in a given compliance year. In the case of a multistate utility like Xcel Energy, the total CF resources would be reduced to reflect the share of generation and purchases allocated to Minnesota.

<sup>6</sup> Minn. Stat. § 216B.1691, subd. 3.

generated or procured by an electric utility if it is produced by an eligible energy technology. The program must permit a credit to be used only once, except that a credit may be used to satisfy both the carbon-free energy standard obligation under subdivision 2g and either the renewable energy standard obligation under subdivision 2a or the solar energy standard obligation under subdivision 2f, if the credit meets the requirements of each subdivision. The program must treat all eligible energy technology equally and shall not give more or less credit to energy based on the state where the energy was generated or the technology with which the energy was generated. The commission must determine the period in which the credits may be used for purposes of the program.

(b) In lieu of generating or procuring energy directly to satisfy a standard obligation under subdivision 2a, 2f, or 2g, an electric utility may utilize renewable energy credits allowed under the program to satisfy the standard.

(c) The commission shall facilitate the trading of renewable energy credits between states.

(d) The commission shall require all electric utilities to participate in a commission-approved credit-tracking system or systems. Once a credit-tracking system is in operation, the commission shall issue an order establishing protocols for trading credits.<sup>7</sup>

The Commission and utilities have over 15 years of experience tracking compliance with the EETS using a system in which unique, serialized RECs are issued, with one REC issued per MWh of eligible generation. RECs are registered on a Commission-approved credit tracking system – the Midwest Renewable Energy Tracking System (M-RETS) – and retired to demonstrate compliance with the EETS.

## **B. Proposed CFS Compliance Demonstration Methodology**

The Company proposes the Commission establish a methodology to demonstrate CFS compliance using a process similar to the procedure used to demonstrate EETS compliance. The Company's proposed process relies on the Minn. Stat. § 216B.1691, subd. 4 REC compliance methodology as its foundation, with modifications to account for non-REC eligible CF generation.

While the EETS compliance methodology is well established and forms a basis for compliance demonstration with the CFS, the CFS raises two new challenges that must be addressed when establishing a compliance determination methodology. First, not all CF resources are defined as an Eligible Energy Technology (EET) in Minn. Stat. § 216B.1691, subd. 1(c), and so not all CF resources are awarded RECs. While nuclear generation is a prominent example of this, other developing CF energy resources and

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<sup>7</sup> Minn. Stat. § [216B.1691](#), subd. 4.

technologies that are not yet commercially mature, and not yet defined as an EET, may also not receive RECs. The methodology to demonstrate compliance with the CFS must consider this and allow for inclusion of CF resources in the compliance demonstration process that are non-EETs.

Second, a methodology to account for resources that involve REC-eligible energy technologies that are partially CF must also be considered for compliance demonstration purposes.

### *1. Accounting for Non-Eligible Energy Technology Carbon Free Resources*

M-RETS is a non-profit organization that issues and tracks energy generated from eligible energy resources in the form of RECs.<sup>8</sup> RECs are a form of environmental attribute that is generally associated with renewable energy. M-RETS now also offers a new product, Alternative Energy Credits (AECs), which are similar to RECs but are designed to track CF energy generated from non-REC eligible resources.<sup>9</sup> One AEC is equivalent to one MWh of CF energy. Similar to RECs, AECs have unique serial tracking numbers, have a four-year shelf life, and are tracked through the M-RETS tracking system. AECs are issued by M-RETS to participating utilities for non-REC eligible CF energy such as nuclear, and could potentially be extended to include additional CF resources and technologies in the future.

The Company plans to begin tracking AECs for nuclear energy generation beginning in calendar year 2026. We believe that supplementing the use of RECs with AECs for CF energy resources that are not REC-eligible will allow for a simple, efficient, and cohesive annual compliance demonstration process with the CFS. The simultaneous use of both forms of environmental attributes, RECs and AECs, will optimize the ability to equally track and demonstrate compliance with the CFS, while maintaining highly accurate reporting metrics with integrity. As AECs are an emerging offering, it will be important to work with M-RETS to understand which CF energy resources and technologies can participate in AECs today, what is planned for the future, and to allow for the use of AECs for CF generation resources and technologies beyond nuclear, as AECs for those resources and technologies become available.

### *2. Partial Compliance Methodology Determination*

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<sup>8</sup> See [How Renewable Energy Certificate Tracking and Systems Work | M-RETS](#).

<sup>9</sup> “M-RETS also supports Alternative Energy Certificates (AEC) to track reported generation (MWh) from approved sources of non-renewable electric generation. AECs have been approved by the M-RETS Administrator as having an environmental benefit that should be tracked in M-RETS despite not being considered as a renewable source “ [MRETS-Operating-Procedure-2023.3.pdf](#)

As noted under Minn. Stat. § 216B.1691 subd. 2d (b)(2), the Commission is required to allow partial compliance with the CFS from (i) electricity generated from facilities that utilize CF technologies, but only for the percentage that is carbon-free, and (ii) from an electric utility's annual purchases from a regional transmission organization (RTO) net of the utility's sales to the RTO, but only for the percentage of annual net purchases that is carbon-free based on the RTO's systemwide annual fuel mix or applicable subregional fuel mix. This latter point is addressed in Section IV below. We note that, overall, partial compliance methodologies must be included in the CFS compliance determination process.

We acknowledge that there will be further discussion in Docket No. E999/CI-24-352 regarding partial compliance and that decisions made in that docket may affect this discussion. We will continue to monitor and participate in that docket, and note that the Company's positions may change based on decisions made in that docket.

The partial compliance associated with CF technology – that is, subd. 2d (b)(2)(i) – was addressed by parties in the Commission's second comment period in this docket. As noted in the Company's June 28, 2024 Comments, we support the inclusion of technologies that result in partial CF generation, even if they do not achieve 100 percent CF energy due to cost or technical limitations. Xcel Energy's preferred calculation methodology is to consider the amount of net generation defined as CF correlated to the annual carbon dioxide (CO<sub>2</sub>) emissions of the unit(s). This CF generation would not, however, receive RECs as it does not qualify as an EET under Minn. Stat. § 216B.1691, subd. 1(c), and is currently not AEC eligible. We encourage the Commission to establish an accounting mechanism to allow for the inclusion of this CF energy in CFS compliance demonstrations, and to work with M-RETS to extend AEC offerings for these generation resources, so that the CF attributes of the generation could be tracked if and when utilities in Minnesota were to adopt/employ CF technologies.

Relatedly, the compliance demonstration process should allow for the inclusion of energy generated from a mixture of CF/EETS and non-CF/non-REC eligible resources. For example, if 60 percent of the generation from a given unit, based on heat content, is associated with the combustion of EET fuels, and 40 percent from the combustion of non-EET fuels, then 60 percent of the net generation will receive RECs as an EET and can therefore be included as part of the compliance demonstration through the retirement of the associated RECs, taking into consideration any decisions made in Docket No. E999/CI-24-352.

### *3. Proposed CFS Compliance Methodology*

The Company proposes a CFS compliance methodology that relies upon, as its foundation, the compliance methodology utilized for almost two decades for EETS compliance demonstration, but builds upon it by incorporating AECs.

Utilities should first calculate their compliance year CF requirement by applying the given compliance year's percent CF requirement to their Minnesota annual retail sales for the given year, resulting in an energy value in MWh's. One REC and/or AEC must then be retired for each MWh in order to demonstrate compliance with the CFS for that compliance year. This demonstration process should recognize that one REC can simultaneously be retired for both CFS and EETS compliance demonstration purposes, while one AEC may only be retired for CFS compliance.

If a utility did not generate an adequate number of RECs and/or AECs equivalent to their annual Minnesota retail sales compliance year CFS requirement, the utility would be required to purchase additional RECs or AECs for compliance demonstration purposes.

REC/AEC retirement would not currently apply to partially complying resources for which M-RETS does not currently offer RECs/AECs. Compliance methodology for these resources will be dependent upon further Commission investigation in Docket No. E999/CI-24-352 and will require discussions with M-RETS.

### **III. CONSIDERATIONS REGARDING DOUBLE COUNTING**

The Commission's question regarding considerations it should take into account regarding the double counting of RECs to meet multiple requirements implies that RECs will be relied on for CFS compliance demonstration purposes, which is one of the topics the Commission is examining in this round of Comments. Presuming the Commission determines RECs are to be relied upon for CFS compliance demonstration, Minn. Stat. § 216B.1691, subd. 4 is clear that one REC may be used to:

... satisfy both the carbon-free energy standard obligation under subdivision 2g and either the renewable energy standard obligation under subdivision 2a or the solar energy standard obligation under subdivision 2f, if the credit meets the requirements of each subdivision.<sup>10</sup>

Therefore, one REC could be used in a given year for compliance with either the SES/EETS or the CFS, or with both the CFS and the SES/EETS.

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<sup>10</sup> [Minn. Stat. §216B.1691](#), subd. 4(a).



Each REC has a unique serial number corresponding to the EET generation source, month and year and other information and thus, retirement of a REC for compliance with the EETS helps avoid any double claim on that same MWh to comply with another utility's CFS requirement. Once a REC is retired, it is taken out of circulation and can never be used again for any other purpose.

#### **IV. COUNTING OF NET MARKET PURCHASES**

In the Commission's November 7, 2024 ORDER INITIATING NEW DOCKET AND CLARIFYING "ENVIRONMENTAL JUSTICE AREA" in Docket Nos. E999/CI-23-151, E999/CI-24-352, the Commission provisionally directed:

...utilities, in their filings under the Carbon-Free Standard and in resource plans under Minn. Stat. § 215B.2422, to calculate the percentage of carbon-free market purchases on an applicable regional transmission organization subregion using annual energy fuel mix data as practicable.<sup>11</sup>

We agree that the percentage of market purchases considered CF should be based upon the MISO North annual energy fuel mix data for the given compliance demonstration year. This will require coordination with MISO to ascertain that this information is available in a timely fashion for compliance demonstration purposes. We note that this topic will also be addressed in Docket No. E999/CI-24-352 and the outcomes in that docket should be taken into consideration in this docket.

#### **V. OTHER ISSUES OR CONCERNS**

We have no additional issues or concerns to share with the Commission at this time. We look forward to forthcoming decisions in this proceeding and in Docket No. E999/CI-24-352, so that they can be incorporated into our IRP planning process.

#### **CONCLUSION**

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

Dated: January 29, 2025

Northern States Power Company

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<sup>11</sup> See Order at page 7, *In the Matter of an Investigation into Implementing Changes to the Renewable Energy Standard and the Newly Created Carbon-Free Standard under Minn. Stat. § 216B.1691*.

## CERTIFICATE OF SERVICE

I, Marie Horner, 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-23-151**

Dated this 29<sup>th</sup> day of January 2025

/s/

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Regulatory Administrator

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55	Kenneth A.	Colburn	kcolburn@symbioticstrategies.com	Symbiotic Strategies, LLC		26 Winton Road Meredith NH, 32535413 United States	Electronic Service		No	23-151Official
56	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	23-151Official
57	Jean	Comstock	jean.comstock.dbcc@gmail.com	St. Paul 350		729 6th St E St. Paul MN, 55106 United States	Electronic Service		No	23-151Official
58	Hillary	Creurer	hcreurer@allete.com	Minnesota Power		30 W Superior St Duluth MN, 55802 United States	Electronic Service		No	23-151Official
59	George	Crocker	gwillc@nawo.org	North American Water Office		5093 Keats Avenue Lake Elmo MN, 55042 United States	Electronic Service		No	23-151Official
60	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	23-151Official
61	Brooke	Cunningham	health.review@state.mn.us	Minnesota Department of Health		PO Box 64975 St. Paul MN, 55164-0975 United States	Electronic Service		No	23-151Official
62	Stacy	Dahl	sdahl@minnkota.com	Minnkota Power Cooperative, Inc.		5301 32nd Ave S Grand Forks ND, 58201 United States	Electronic Service		No	23-151Official
63	Lorene	Damsits	lorened@cmpasgroup.org	Central MN MPA		459 S Grove St Blue Earth MN, 56013 United States	Electronic Service		No	23-151Official
64	Lisa	Daniels	lisadaniels@windustry.org	Windustry		201 Ridgewood Ave Minneapolis MN, 55403 United States	Electronic Service		No	23-151Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
65	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	23-151Official
66	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	23-151Official
67	Jason	Decker	jason.decker@llojibwe.net	Leech Lake Band of Ojibwe		190 Sailstar Drive NW Cass Lake MN, 56633 United States	Electronic Service		No	23-151Official
68	James	Denniston	james.r.denniston@xcelenergy.com	Xcel Energy Services, Inc.		414 Nicollet Mall, 401-8 Minneapolis MN, 55401 United States	Electronic Service		No	23-151Official
69	Bobby	Deschampe	robertdeschampe@grandportage.com	Grand Portage Band of Lake Superior Chippewa		PO Box 428 Grand Portage MN, 55605 United States	Electronic Service		No	23-151Official
70	Curt	Dieren	curt.dieren@dgr.com	L&O Power Cooperative		1302 S Union St Rock Rapids IA, 51246 United States	Electronic Service		No	23-151Official
71	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	23-151Official
72	Becky	Dobbs	bdobbs@greenergy.com			null null, null United States	Electronic Service		No	23-151Official
73	J.	Drake Hamilton	hamilton@fresh-energy.org	Fresh Energy		408 St Peter St Ste 350 Saint Paul MN, 55101 United States	Electronic Service		No	23-151Official
74	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	23-151Official
75	Adam	Duininck	aduininck@ncsrcc.org	North Central States Regional Council of Carpenters		700 Olive Street St. Paul MN, 55130 United States	Electronic Service		No	23-151Official
76	Kristin W	Duncanson	kw.duncanson@gmail.com			57746 Highway 30 Mapleton MN, 56065 United States	Electronic Service		No	23-151Official
77	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	23-151Official
78	Kevin	Dupuis, Sr.	kevindupuis@fdlrez.com			Reservation Business Committee 1720 Big Lake Rd Cloquet MN, 55720 United States	Electronic Service		No	23-151Official





#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
92	Gary	Frazer	gfrazier@mnchippewatribe.org	Minnesota Chippewa Tribe		PO Box 217 Cass Lake MN, 56633 United States	Electronic Service		No	23-151Official
93	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	23-151Official
94	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	23-151Official
95	Stacey	Fujii	sfujii@grenergy.com	Great River Energy		12300 Elm Creek Boulevard Maple Grove MN, 55369-4718 United States	Electronic Service		No	23-151Official
96	Jessica	Fyhrie	jfyhrie@otpc.com	Otter Tail Power Company		PO Box 496 Fergus Falls MN, 56538-0496 United States	Electronic Service		Yes	23-151Official
97	Edward	Garvey	garveyed@aol.com	Residence		32 Lawton St Saint Paul MN, 55102 United States	Electronic Service		No	23-151Official
98	Benjamin	Gerber	ben@mrets.org	Midwest Renewable Energy Tracking System		60 South Sixth Street Suite 2800 Minneapolis MN, 55402 United States	Electronic Service		No	23-151Official
99	David P.	Geschwind	dp.geschwind@smpa.org	Southern Minnesota Municipal Power Agency		500 First Avenue SW Rochester MN, 55902 United States	Electronic Service		No	23-151Official
100	Shannon	Geshick	shannon.geshick@state.mn.us	Minnesota Indian Affairs Council (MIAC)		null null, null United States	Electronic Service		No	23-151Official
101	Allen	Gleckner	gleckner@fresh-energy.org	Fresh Energy		408 St. Peter Street Ste 350 Saint Paul MN, 55102 United States	Electronic Service		No	23-151Official
102	Jenny	Glumack	jenny@mrea.org	Minnesota Rural Electric Association		11640 73rd Ave N Maple Grove MN, 55369 United States	Electronic Service		No	23-151Official
103	Julie	Goehring	julie@redriverbasincommission.org			708 70 Ave NW Moorhead MN, 56560 United States	Electronic Service		No	23-151Official
104	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	23-151Official
105	Tessa	Haagenson	tessa.haagenson@connexusenergy.com	Connexus Energy		14601 Ramsey Blvd NW Ramsey MN, 55303 United States	Electronic Service		No	23-151Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
106	Jeffrey	Haase	jhaase@grenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	23-151Official
107	Hal	Halpern	halhalpern@clpower.com	Cooperative Light & Power		1554 Hwy 2 PO Box 69 Two Harbors MN, 55616 United States	Electronic Service		No	23-151Official
108	Jeremy	Hamilton	jhamilton@uppersiouxcommunity-nsn.gov	Upper Sioux Community		Upper Sioux Community PO Box 147 Granite Falls MN, 56241 United States	Electronic Service		No	23-151Official
109	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	23-151Official
110	James	Hartson				59931 300th Street Waltham MN, 55982 United States	Paper Service		No	23-151Official
111	Amy	Hastings	amyh@uppersiouxcommunity-nsn.gov	Upper Sioux Community		5722 Travers Lane PO Box 147 Granite Falls MN, 56241 United States	Electronic Service		No	23-151Official
112	Erik	Hatlestad	erik@cureriver.org			117 1st St Montevideo MN, 56265 United States	Electronic Service		No	23-151Official
113	Kim	Havey	kim.havey@minneapolismn.gov	City of Minneapolis		350 South 5th Street, Suite 315M Minneapolis MN, 55415 United States	Electronic Service		No	23-151Official
114	Philip	Hayet	phayet@jkenn.com	J. Kennedy and Associates, Inc.		570 Colonial Park Drive Suite 305 Roswell GA, 30075-3770 United States	Electronic Service		No	23-151Official
115	Adam	Heinen	aheinen@dakotaelectric.com	Dakota Electric Association		4300 220th St W Farmington MN, 55024 United States	Electronic Service		No	23-151Official
116	Annete	Henkel	mui@mnuilityinvestors.org	Minnesota Utility Investors		413 Wacouta Street #230 St.Paul MN, 55101 United States	Electronic Service		No	23-151Official
117	Jessy	Hennesy	jessy.hennesy@avantenergy.com	Avant Energy		220 S. Sixth St. Ste 1300 Minneapolis MN, 55402 United States	Electronic Service		No	23-151Official
118	Kristin	Henry	kristin.henry@sierraclub.org	Sierra Club		2101 Webster St Ste 1300 Oakland CA, 94612 United States	Electronic Service		No	23-151Official
119	Benjamin	Hertz	bhertz@bepc.com	Basin Electric Power Cooperative		1717 E Interstate Ave Bismarck ND, 58503 United States	Electronic Service		Yes	23-151Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
120	Holly	Hinman	holly.r.hinman@xcelenergy.com	Xcel Energy		414 Nicollet Mall, 7th Floor Minneapolis MN, 55401 United States	Electronic Service		No	23-151Official
121	Joe	Hoffman	ja.hoffman@smmpa.org	SMMPA		500 First Ave SW Rochester MN, 55902-3303 United States	Electronic Service		No	23-151Official
122	Michael	Hoppe	lu23@ibew23.org	Local Union 23, I.B.E.W.		445 Etna Street Ste. 61 St. Paul MN, 55106 United States	Electronic Service		No	23-151Official
123	Ronald	Horman	rhorman@redwoodelectric.com	Redwood Electric Cooperative		60 Pine Street Clements MN, 56224 United States	Electronic Service		No	23-151Official
124	Rick	Horton	rhorton@minnesotaforests.com	Minnesota Forest Industries		324 West Superior Street 903 Medical Arts Building Duluth MN, 55802 United States	Electronic Service		No	23-151Official
125	Robbie	Howe	robbie.howe@llojibwe.net	Leech Lake Band of Ojibwe		190 Sailstar Drive NW Cass Lake MN, 56633 United States	Electronic Service		No	23-151Official
126	John	Ihle	ljihle@rrt.net	PlainStates Energy LLC		27451 S Hwy 34 Barnesville MN, 56514 United States	Electronic Service		No	23-151Official
127	Annie	Jackson	cheryl.jackson@whiteearth-nsn.gov	White Earth Nation		White Earth Tribal Headquarters 35500 Eagle View Road Ogemo MN, 56569 United States	Electronic Service		No	23-151Official
128	Faron	Jackson, Sr.	faron.jackson@llojibwe.net			190 Sailstar Drive NW Cass Lake MN, 56633 United States	Electronic Service		No	23-151Official
129	Casey	Jacobson	cjacobson@bepc.com	Basin Electric Power Cooperative		1717 East Interstate Avenue Bismarck ND, 58501 United States	Electronic Service		No	23-151Official
130	Justin	Jahnz	justin.jahnz@ecemn.com	East Central Energy		412 Main Ave N Braham MN, 55006 United States	Electronic Service		No	23-151Official
131	Alan	Jenkins	aj@jenkinsatlaw.com	Jenkins at Law		2950 Yellowtail Ave. Marathon FL, 33050 United States	Electronic Service		No	23-151Official
132	Nathan	Jensen	njensen@otpc.com	Otter Tail Power Company		215 S. Cascade St. Fergus Falls MN, 56537 United States	Electronic Service		No	23-151Official
133	Kevin	Jensvold	kevinj@uppersiouxcommunity-nsn.gov	Upper Sioux Community		PO Box 147 Granite Falls MN, 56241-	Electronic Service		No	23-151Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						0147 United States				
134	Annette	Johnson	annette.johnson@redlakenation.org	Red Lake Nation		15484 Migizi Drive Red Lake MN, 56671 United States	Electronic Service		No	23-151Official
135	Jody	Johnson	jody.johnson@piic.org	Prairie Island Indian Community		5636 Sturgeon Lake Rd Welch MN, 55089 United States	Electronic Service		No	23-151Official
136	Johnny	Johnson	johnny.johnson@piic.org	Prairie Island Indian Community		5636 Sturgeon Lake Road Welch MN, 55089 United States	Electronic Service		No	23-151Official
137	Richard	Johnson	rick.johnson@lawmoss.com	Moss & Barnett		150 S. 5th Street Suite 1200 Minneapolis MN, 55402 United States	Electronic Service		No	23-151Official
138	Sarah	Johnson Phillips	sjphillips@stoel.com	Stoel Rives LLP		33 South Sixth Street Suite 4200 Minneapolis MN, 55402 United States	Electronic Service		No	23-151Official
139	Nate	Jones	njones@hcpd.com	Heartland Consumers Power		PO Box 248 Madison SD, 57042 United States	Electronic Service		No	23-151Official
140	Nick	Kaneski	nick.kaneski@enbridge.com	Enbridge Energy Company, Inc.		11 East Superior St Ste 125 Duluth MN, 55802 United States	Electronic Service		No	23-151Official
141	Veda	Kanitz	vmkanitz@gmail.com			null null, null United States	Electronic Service		No	23-151Official
142	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	23-151Official
143	David	Kempf	dkempf@greenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	23-151Official
144	William	Kenworthy	will@votesolar.org			1 South Dearborn St Ste 2000 Chicago IL, 60603 United States	Electronic Service		No	23-151Official
145	Becky	Kern	bkern@bepc.com	Basin Electric Power Cooperative		1717 E Interstate Ave Bismarck ND, 58501 United States	Electronic Service		Yes	23-151Official
146	Samuel B.	Ketchum	sketchum@kennedy-graven.com	Kennedy & Graven, Chartered		150 S 5th St Ste 700 Minneapolis MN, 55402 United States	Electronic Service		No	23-151Official
147	Nazir	Khan	nazir@mnejtable.org	Minnesota Environmental Justice Table		2720 E 22nd St Minneapolis MN, 55406 United States	Electronic Service		No	23-151Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
148	Hudson	Kingston	hudson@curemn.org			PO Box 712 Ely MN, 55731 United States	Electronic Service		No	23-151Official
149	Kate	Knuth	kate.knuth@gmail.com			2347 14th Terrace NW New Brighton MN, 55112 United States	Electronic Service		No	23-151Official
150	Frank	Kohlasch	frank.kohlasch@state.mn.us		Minnesota Pollution Control Agency	520 Lafayette Rd N. St. Paul MN, 55155 United States	Electronic Service		No	23-151Official
151	Brian	Kolbinger	brian@beckertownship.org	Becker Township Board		PO Box 248 12165 Hancock St Becker MN, 55308 United States	Electronic Service		No	23-151Official
152	Seth	Koneczny	st.koneczny@smmpa.org	SMMPA		500 First Avenue, SW Rochester MN, 55902-3303 United States	Electronic Service		No	23-151Official
153	Brian	Krambeer	bkrambeer@mienergy.coop	MiEnergy Cooperative		PO Box 626 31110 Cooperative Way Rushford MN, 55971 United States	Electronic Service		No	23-151Official
154	Randy	Kramer	rlkramer89@gmail.com	Water and Soil Resources Board		42808 Co. Rd. 11 Bird Island MN, 55310 United States	Electronic Service		No	23-151Official
155	Allen	Krug	allen.krug@xcelenergy.com	Xcel Energy		414 Nicollet Mall-7th fl Minneapolis MN, 55401 United States	Electronic Service		No	23-151Official
156	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	23-151Official
157	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	23-151Official
158	Therese	LaCanne	tlacanne@greenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	23-151Official
159	Matthew	Lacey	mlacey@greenergy.com	Great River Energy		12300 Elm Creek Boulevard Maple Grove MN, 55369-4718 United States	Electronic Service		No	23-151Official
160	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	23-151Official
161	Carmel	Laney	carmel.laney@stoel.com	Stoel Rives LLP		33 South Sixth Street Suite 4200 Minneapolis	Electronic Service		No	23-151Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						MN, 55402 United States				
162	Arthur	LaRose	arthur.larose@llojibwe.net	Leech Lake Band of Ojibwe		190 Sailstar Drive NW Cass Lake MN, 56633 United States	Electronic Service		No	23-151Official
163	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	23-151Official
164	Emily	Larson	elarson@duluthmn.gov	City of Duluth		411 W 1st St Rm 403 Duluth MN, 55802 United States	Electronic Service		No	23-151Official
165	James D.	Larson	james.larson@avantenergy.com	Avant Energy Services		220 S 6th St Ste 1300 Minneapolis MN, 55402 United States	Electronic Service		No	23-151Official
166	Mark	Larson	mlarson@meeker.coop	Meeker Coop Light & Power Assn		1725 Highway 12 E Ste 100 Litchfield MN, 55355 United States	Electronic Service		No	23-151Official
167	Peder	Larson	plarson@larkinhoffman.com	Larkin Hoffman Daly & Lindgren, Ltd.		8300 Norman Center Drive Suite 1000 Bloomington MN, 55437 United States	Electronic Service		No	23-151Official
168	Rachel	Leonard	rachel.leonard@ci.monticello.mn.us	City of Monticello		505 Walnut St Ste 1 Monticello MN, 55362 United States	Electronic Service		No	23-151Official
169	Dan	Leshner	dlesher@greenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	23-151Official
170	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	23-151Official
171	Jesse	Levine	jesse_levine@afandpa.org			1101 K St NW Suite 700 Washington DC, 20005 United States	Electronic Service		No	23-151Official
172	Amy	Liberkowsky	amy.a.liberkowsky@xcelenergy.com	Xcel Energy		414 Nicollet Mall 7th Floor Minneapolis MN, 55401-1993 United States	Electronic Service		No	23-151Official
173	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	23-151Official
174	Eric	Lipman	eric.lipman@state.mn.us		Office of Administrative Hearings	PO Box 64620 St. Paul MN, 55164-0620 United States	Electronic Service		Yes	23-151Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
175	Michelle	Lommel	mlommel@grenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	23-151Official
176	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	23-151Official
177	Andrea	Lovoll	alovoll@mnejtable.org	Minnesota Environmental Justice Table		2720 E 22nd St. Minneapolis MN, 55406 United States	Electronic Service		No	23-151Official
178	Nicole	Luckey	nluckey@invenergyllc.com	Invenergy LLC		1 S. Wacker Suite 1800 Chicago IL, 60606 United States	Electronic Service		No	23-151Official
179	Susan	Ludwig	sludwig@mnpower.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	23-151Official
180	Robert	Lunder	robert.lunder@mdu.com	Montana-Dakota Utilities (ET)		400 N 4th St Bismark ND, 58501 United States	Electronic Service		No	23-151Official
181	Alice	Madden	alice@communitypowermn.org	Community Power		2720 E 22nd St Minneapolis MN, 55406 United States	Electronic Service		No	23-151Official
182	Scott	Magnuson	smagnuson@bpu.org	Brainerd Public Utilities		8027 Highland Scenic Rd Baxter MN, 56425 United States	Electronic Service		No	23-151Official
183	Kavita	Maini	kmaini@wi.rr.com	KM Energy Consulting, LLC		961 N Lost Woods Rd Oconomowoc WI, 53066 United States	Electronic Service		No	23-151Official
184	Emily	Marshall	emarshall@mojlaw.com	Miller O'Brien Jensen, PA		120 S. 6th Street Suite 2400 Minneapolis MN, 55402 United States	Electronic Service		No	23-151Official
185	Mary	Martinka	mary.a.martinka@xcelenergy.com	Xcel Energy Inc		414 Nicollet Mall 7th Floor Minneapolis MN, 55401 United States	Electronic Service		No	23-151Official
186	Gregg	Mast	gmast@cleanenergyeconomymn.org	Clean Energy Economy Minnesota		4808 10th Avenue S Minneapolis MN, 55417 United States	Electronic Service		No	23-151Official
187	Shena	Matrious	shena.matrious@millelacsband.com	Mille Lacs Band of Ojibwe		43408 Oodena Drive Onamia MN, 56349 United States	Electronic Service		No	23-151Official



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188	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	23-151Official
189	Tim	McCarthy	tim.mccarthy@siouxvalleyenergy.com	Sioux Valley Southwestern Electric Cooperative, Inc. d/b/a Sioux Valley Energy		null null, null United States	Electronic Service		No	23-151Official
190	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	23-151Official
191	April	McCormick	aprilm@grandportage.com	Grand Portage Band of Lake Superior Chippewa		PO Box 428 Grand Portage MN, 55605 United States	Electronic Service		No	23-151Official
192	Jess	McCullough	jmccullough@mnpower.com	Minnesota Power		30 W Superior St Duluth MN, 55802 United States	Electronic Service		No	23-151Official
193	Sara G	McGrane	smcgrane@felhaber.com	Felhaber Larson		220 S 6th St Ste 2200 Minneapolis MN, 55420 United States	Electronic Service		No	23-151Official
194	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	23-151Official
195	Harvey	McMahon	hcmahon@otpc.com	Otter Tail Power Company		215 South Cascade Street Fergus Falls MN, 56537 United States	Electronic Service		No	23-151Official
196	Taylor	McNair	taylor@gridlab.org			668 Capp Street San Francisco CA, 94110 United States	Electronic Service		No	23-151Official
197	Ronald	Meier	rmeier@mcleodcoop.com	Mcleod Cooperative Power		3515 11th St East Glencoe MN, 55336 United States	Electronic Service		No	23-151Official
198	Melanie	Mesko Lee	melanie.lee@burnsvillemn.gov	City of Burnsville		100 Civic Center Parkway Burnsville MN, 55337-3867 United States	Electronic Service		No	23-151Official
199	Peder	Mewis	pmewis@cleangridalliance.org	Clean Grid Alliance		570 Asbury St. St. Paul MN, 55104 United States	Electronic Service		No	23-151Official
200	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,	Electronic Service		No	23-151Official



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212	Sonny	Myers	smyers@1854treatyauthority.org	1854 Treaty Authority		4428 Haines Rd Duluth MN, 55811-1524 United States	Electronic Service		No	23-151Official
213	Ben	Nelson	benn@cmpasgroup.org	CMPMPA		459 South Grove Street Blue Earth MN, 56013 United States	Electronic Service		No	23-151Official
214	Carl	Nelson	cnelson@mncee.org	Center for Energy and Environment		212 3rd Ave N Ste 560 Minneapolis MN, 55401 United States	Electronic Service		No	23-151Official
215	Deb	Nelson	dnelson@greenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	23-151Official
216	David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency		220 South Sixth Street Suite 1300 Minneapolis MN, 55402 United States	Electronic Service		No	23-151Official
217	Duane	Ninneman	duane@cureriver.org	Clean Up the River Environment		117 South 1st St Montevideo MN, 56265 United States	Electronic Service		No	23-151Official
218	Michael	Noble	noble@fresh-energy.org	Fresh Energy		408 Saint Peter St Ste 350 Saint Paul MN, 55102 United States	Electronic Service		No	23-151Official
219	Rolf	Nordstrom	rnordstrom@gpisd.net	Great Plains Institute		2801 21ST AVE S STE 220 Minneapolis MN, 55407-1229 United States	Electronic Service		No	23-151Official
220	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	23-151Official
221	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	23-151Official
222	Ric	O'Connell	ric@gridlab.org	GridLab		2120 University Ave Berkeley CA, 94704 United States	Electronic Service		No	23-151Official
223	Joseph	OBrien	joey.obrien@lowersioux.com			39527 Highway 1 Morton MN, 56270 United States	Electronic Service		No	23-151Official
224	Matthew	Olsen	molsen@otpc.com	Otter Tail Power Company		215 South Cascade Street Fergus Falls MN, 56537 United States	Electronic Service		No	23-151Official
225	Russell	Olson	rolson@hcpd.com	Heartland Consumers Power District		PO Box 248 Madison SD, 57042-0248 United States	Electronic Service		No	23-151Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
226	Debra	Opatz	dopatz@otpc.com	Otter Tail Power Company		215 South Cascade Street Fergus Falls MN, 56537 United States	Electronic Service		No	23-151Official
227	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	23-151Official
228	Jamie	Overgaard	jovergaard@minnkota.com	Minnkota Power Cooperative, Inc.		5301 32nd Ave S Grand Forks ND, 58201 United States	Electronic Service		No	23-151Official
229	Carol A.	Overland	overland@legalelectric.org	Legalelectric - Overland Law Office		1110 West Avenue Red Wing MN, 55066 United States	Electronic Service		No	23-151Official
230	Gregory	Padden	gpadden@grenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	23-151Official
231	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	23-151Official
232	Marsha	Parlow	mparlow@grenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	23-151Official
233	Priti	Patel	ppatel@grenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369-4718 United States	Electronic Service		No	23-151Official
234	Gerad	Paul	gpaul@minnkota.com	Minnkota Power Cooperative		5301 32nd Ave S Grand Forks ND, 58201 United States	Electronic Service		No	23-151Official
235	Earl	Pendleton	earl.pendleton@lowersioux.com	Lower Sioux Indian Community		39527 Highway 1 Morton MN, 56270 United States	Electronic Service		No	23-151Official
236	Mary Beth	Peranteau	mperanteau@fredlaw.com	Fredrikson & Byron, P.A.		44 East Mifflin Street Suite 1000 Madison WI, 53703 United States	Electronic Service		No	23-151Official
237	Thom	Petersen	thom.petersen@state.mn.us		Minnesota Department of Agriculture	625 North Robert St Saint Paul MN, 55155 United States	Electronic Service		No	23-151Official
238	Luke	Peterson	luke.peterson@hpuc.com	Hibbing Public Utilities Commission		1902 Sixth Ave E Hibbing MN, 55746 United States	Electronic Service		No	23-151Official
239	Neil	Peterson	info@nclucb.org	Northern Counties Land Use Coordinating Board		null null, null United States	Electronic Service		No	23-151Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
240	DONNA	PICKARD	dpickard@aladdinsolar.com	Genie Solar Support Services		1215 Lilac Lane Excelsior MN, 55331 United States	Electronic Service		No	23-151Official
241	Gordon	Pietsch	gpietsch@grenergy.com	Great River Energy		12300 Elm Creek Blvd. Maple Grove MN, 55369-4718 United States	Electronic Service		No	23-151Official
242	Joe	Plumer	joe.plumer@redlakenation.org	Red Lake Nation		15484 Migizi Drive Red Lake MN, 56671 United States	Electronic Service		No	23-151Official
243	J.	Porter	greg.porter@nngco.com	Northern Natural Gas Company		1111 South 103rd St Omaha NE, 68124 United States	Electronic Service		No	23-151Official
244	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	23-151Official
245	Robert	Prescott	bob.prescott@lowersioux.com	Lower Sioux Indian Community		39527 Highway 1 Morton MN, 56270 United States	Electronic Service		No	23-151Official
246	David	Raatz	draatz@bepc.com	Basin Electric Power Cooperative		1717 East Interstate Avenue Bismarck ND, 58501 United States	Electronic Service		No	23-151Official
247	John C.	Reinhardt		Laura A. Reinhardt		3552 26th Ave S Minneapolis MN, 55406 United States	Paper Service		No	23-151Official
248	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	23-151Official
249	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	23-151Official
250	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	23-151Official
251	John	Richards	johnrichards@nweco.com	Northwestern Wisconsin Electric Company		104 S. Pine St. Grantsburg WI, 54840 United States	Electronic Service		No	23-151Official
252	Greg	Ridderbusch	greg.ridderbusch@connexusenergy.com	Connexus Energy		14601 Ramsey Boulevard Ramsey MN, 55303 United States	Electronic Service		No	23-151Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
253	Susan	Romans	sromans@allete.com	Minnesota Power		30 West Superior Street Legal Dept Duulth MN, 55802 United States	Electronic Service		No	23-151Official
254	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	23-151Official
255	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	23-151Official
256	Bill	Rudnicki	bill.rudnicki@shakopeedakota.org	Shakopee Mdewakanton Sioux Community		Shakopee Mdewakanton Sioux Community 2330 Sioux Trail NW Prior Lake MN, 55372 United States	Electronic Service		No	23-151Official
257	Nathaniel	Runke	nrunke@local49.org			611 28th St. NW Rochester MN, 55901 United States	Electronic Service		No	23-151Official
258	Zachary	Ruzycki	zruzycki@grenergy.com	Great River Energy		12300 Elm Creek Boulevard Maple Grove MN, 55369 United States	Electronic Service		No	23-151Official
259	Mike	Saer	msaer@grenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	23-151Official
260	Robert K.	Sahr	bsahr@eastriver.coop	East River Electric Power Cooperative		P.O. Box 227 Madison SD, 57042 United States	Electronic Service		No	23-151Official
261	Todd	Sailer		Minnetonka Power Cooperative		5301 32nd Ave. S Grand Forks ND, 58201 United States	Paper Service		No	23-151Official
262	Miranda	Sam	miranda.sam@lowersioux.com	Lower Sioux Indian Community		39527 Reservation Highway 1 PO Box 308 Morton MN, 56270 United States	Electronic Service		No	23-151Official
263	Joseph L	Sathe	jsathe@kennedy-graven.com	Kennedy & Graven, Chartered		150 S 5th St Ste 700 Minneapolis MN, 55402 United States	Electronic Service		No	23-151Official
264	Adam	Savariego	adams@uppersiouxcommunity-nsn.gov	Upper Sioux Community		5722 Travers Lane PO Box 147 Granite Falls MN, 56241 United States	Electronic Service		No	23-151Official
265	John	Saxhaug	john_saxhaug@yahoo.com			3940 Harriet Ave Minneapolis	Electronic Service		No	23-151Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						MN, 55409 United States				
266	Jean	Schafer	jeans@bepc.com	Basin Electric Power Cooperative		1717 E Interstate Ave Bismarck ND, 58501 United States	Electronic Service		No	23-151Official
267	Jeff	Schneider	jeff.schneider@ci.red-wing.mn.us	City of Red Wing		315 West 4th Street Red Wing MN, 55066 United States	Electronic Service		No	23-151Official
268	Mark	Schoennauer	markwsch@hotmail.com			607 19th St NW Apt 17 Rochester MN, 55901 United States	Electronic Service		No	23-151Official
269	Kay	Schraeder	kschraeder@minnkota.com	Minnkota Power		5301 32nd Ave S Grand Forks ND, 58201 United States	Electronic Service		No	23-151Official
270	Kathleen	Schuler	keschuler47@gmail.com			1520 10th Ave S #2 Minneapolis MN, 55404 United States	Electronic Service		No	23-151Official
271	Robert H.	Schulte	rhs@schulteassociates.com	Schulte Associates LLC		1742 Patriot Rd Northfield MN, 55057 United States	Electronic Service		No	23-151Official
272	J.P.	Schumacher	jps@mrenergy.com	Missouri River Energy Services		null null, null United States	Electronic Service		No	23-151Official
273	Kevin	Schumacher	kevin@mrets.org	Midwest Renewable Energy Tracking System		null null, null United States	Electronic Service		No	23-151Official
274	Ronald J.	Schwartau	rschwartau@noblesce.com	Nobles Electric Cooperative		22636 U.S. Hwy. 59 Worthington MN, 56187 United States	Electronic Service		No	23-151Official
275	Christine	Schwartz	regulatory.records@xcelenergy.com	Xcel Energy		414 Nicollet Mall FL 7 Minneapolis MN, 55401-1993 United States	Electronic Service		No	23-151Official
276	Douglas	Seaton	doug.seaton@umwlc.org	Upper Midwest Law Center		8421 Wayzata Blvd Ste 300 Golden Valley MN, 55426 United States	Electronic Service		No	23-151Official
277	Dean	Sedgwick	sedgwick@itascapower.com	Itasca Power Company		PO Box 455 Spring Lake MN, 56680 United States	Electronic Service		No	23-151Official
278	Jessie	Seim	jessie.seim@piic.org	Prairie Island Indian Community		5636 Sturgeon Lake Rd Welch MN, 55089 United States	Electronic Service		No	23-151Official
279	Darrell	Seki, Sr.	dseki@redlakenation.org			15484 Migizi Drive Red Lake MN, 56671 United States	Electronic Service		No	23-151Official
280	Will	Seuffert	will.seuffert@state.mn.us		Public Utilities Commission	121 7th Pl E Ste 350 Saint Paul MN, 55101 United States	Electronic Service		Yes	23-151Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
281	Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates		7400 Lyndale Ave S Ste 190 Richfield MN, 55423 United States	Electronic Service		Yes	23-151Official
282	Bria	Shea	bria.e.shea@xcelenergy.com	Xcel Energy		414 Nicollet Mall Minneapolis MN, 55401 United States	Electronic Service		No	23-151Official
283	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	23-151Official
284	Doug	Shoemaker	dougs@charter.net	Minnesota Renewable Energy		2928 5th Ave S Minneapolis MN, 55408 United States	Electronic Service		No	23-151Official
285	Beth	Smith	bsmith@greatermankato.com	Greater Mankato Growth		1961 Premier Dr Ste 100 Mankato MN, 56001 United States	Electronic Service		No	23-151Official
286	Joel	Smith	jsmith@mnchippewatribe.org	Minnesota Chippewa Tribe		PO Box 217 Cass Lake MN, 56633 United States	Electronic Service		No	23-151Official
287	Joshua	Smith	joshua.smith@sierraclub.org			85 Second St FL 2 San Francisco CA, 94105 United States	Electronic Service		No	23-151Official
288	Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.		76 W Kellogg Blvd St. Paul MN, 55102 United States	Electronic Service		No	23-151Official
289	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	23-151Official
290	Trevor	Smith	trevor.smith@avantenergy.com	Avant Energy, Inc.		220 South Sixth Street Suite 1300 Minneapolis MN, 55402 United States	Electronic Service		No	23-151Official
291	Roger	Smith, Sr.	rogermsmithsr@fdlrez.com			1720 Big Lake Road Cloquet MN, 55720 United States	Electronic Service		No	23-151Official
292	Beth	Soholt	bsoholt@cleangridalliance.org	Clean Grid Alliance		570 Asbury Street Suite 201 St. Paul MN, 55104 United States	Electronic Service		No	23-151Official
293	Anna	Sommer	asommer@energyfuturesgroup.com	Energy Futures Group		PO Box 692 Canton NY, 13617 United States	Electronic Service		No	23-151Official
294	Marie	Spry	mariespry@grandportage.com			PO Box 428 Grand Portage MN, 55605 United States	Electronic Service		No	23-151Official
295	Mark	Spurr	mspurr@fvbenergy.com	International District Energy		222 South Ninth St.,	Electronic Service		No	23-151Official



#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
				Association		Suite 825 Minneapolis MN, 55402 United States				
296	Wallace	St. John, Sr.	wally.stjohn@millelacsband.com	Mille Lacs Band of Ojibwe		43408 Oodena Drive Onamia MN, 56359 United States	Electronic Service		No	23-151Official
297	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	23-151Official
298	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	23-151Official
299	Byron E.	Starns	byron.starns@stinson.com	STINSON LLP		50 S 6th St Ste 2600 Minneapolis MN, 55402 United States	Electronic Service		No	23-151Official
300	Cary	Stephenson	cstephenson@otpc.com	Otter Tail Power Company		215 South Cascade Street Fergus Falls MN, 56537 United States	Electronic Service		Yes	23-151Official
301	Mark	Strohfus	mstrohfus@grenergy.com	Great River Energy		12300 Elm Creek Boulevard Maple Grove MN, 55369-4718 United States	Electronic Service		No	23-151Official
302	James M	Strommen	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered		150 S 5th St Ste 700 Minneapolis MN, 55402 United States	Electronic Service		No	23-151Official
303	Samuel	Strong	sam.strong@redlakenation.org	Red Lake Nation		15484 Migizi Drive Red Lake MN, 56671 United States	Electronic Service		No	23-151Official
304	Kent	Sulem	ksulem@mmua.org			3131 Fernbrook Ln N Ste 200 Plymouth MN, 55447-5337 United States	Electronic Service		No	23-151Official
305	Timothy	Sullivan	tsullivan@whe.org	Wright Hennepin Coop. Electric Assn.		6800 Electric Drive PO Box 330 Rockford MN, 55373 United States	Electronic Service		No	23-151Official
306	David	Sunderman	daves@benco.org	BENCO (DUPLICATE)		PO Box 8 Mankato MN, 56002-0008 United States	Electronic Service		No	23-151Official
307	Eric	Swanson	eswanson@winthrop.com	Winthrop & Weinstine		225 S 6th St Ste 3500 Capella Tower Minneapolis MN, 55402-4629 United States	Electronic Service		No	23-151Official
308	Randy	Synstelien	rsynstelien@otpc.com	Otter Tail Power Company		215 S Cascade St Fergus Falls MN, 56537 United States	Electronic Service		No	23-151Official



#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
322	Michael	Volker	mvolker@eastriver.coop	East River Electric Power Coop		211 S. Harth Ave Madison SD, 57042 United States	Electronic Service		No	23-151Official
323	Toni	Volkmeier	toni.volkmeier@state.mn.us	MPCA		520 Lafayette Rd. N. St. Paul MN, 55155 United States	Electronic Service		No	23-151Official
324	Trent	Waite	twaite@grenergy.com			null null, null United States	Electronic Service		No	23-151Official
325	Laurance R	Waldoch	larrywaldoch@gmail.com	Attorney		2597 Parkview Dr Saint Paul MN, 55110 United States	Electronic Service		No	23-151Official
326	Greg	Wannier	greg.wannier@sierraclub.org	Sierra Club		2101 Webster St Ste 1300 Oakland CA, 94612 United States	Electronic Service		No	23-151Official
327	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	23-151Official
328	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	23-151Official
329	Carol	Westergard	cwestergard@otpc.com	Otter Tail Power Company		215 S Cascade St Fergus Falls MN, 56537 United States	Electronic Service		No	23-151Official
330	Heather	Westra	heather.westra@piic.org	Prairie Island Indian Community		5636 Sturgeon Lake Rd Welch MN, 55089 United States	Electronic Service		No	23-151Official
331	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	23-151Official
332	Steve	White	steve.white@llojbwe.net	Leech Lake Band of Ojibwe		190 Sailstar Drive NW Cass Lake MN, 56633 United States	Electronic Service		No	23-151Official
333	Cody	Whitebear	cody.whitebear@piic.org	Prairie Island Indian Community		5636 Sturgeon Lake Road Welch MN, 55089 United States	Electronic Service		No	23-151Official
334	John	Williams	jwilliams@grenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	23-151Official
335	Laurie	Williams	laurie.williams@sierraclub.org	Sierra Club		Environmental Law Program 1536 Wynkoop St Ste 200 Denver CO, 80202 United States	Electronic Service		No	23-151Official

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336	Virgil	Wind	virgil.wind@millelacsband.com	Mille Lacs Band of Ojibwe		43408 Oodena Drive Onamia MN, 56359 United States	Electronic Service		No	23-151Official
337	Joseph	Windler	jwindler@winthrop.com	Winthrop & Weinstine		225 South Sixth Street, Suite 3500 Minneapolis MN, 55402 United States	Electronic Service		No	23-151Official
338	Robyn	Woeste	robynwoeste@alliantenergy.com	Interstate Power and Light Company		200 First St SE Cedar Rapids IA, 52401 United States	Electronic Service		No	23-151Official
339	Sara	Wolff	sara@mnipl.org			710 Linwood Avenue St Paul MN, 55105 United States	Electronic Service		No	23-151Official
340	Tim	Wulling	t.wulling@earthlink.net			1495 Raymond Ave. Saint Paul MN, 55108 United States	Electronic Service		No	23-151Official
341	Laurie	York	laurie.york@whiteearth-nsn.gov	White Earth Reservation Business Committee		PO Box 418 White Earth MN, 56591 United States	Electronic Service		No	23-151Official
342	Kurt	Zimmerman	kwz@ibew160.org	Local Union #160, IBEW		2909 Anthony Ln St Anthony Village MN, 55418-3238 United States	Electronic Service		No	23-151Official
343	Emily	Ziring	eziring@stlouispark.org	City of St. Louis Park		5005 Minnetonka Blvd St. Louis Park MN, 55416 United States	Electronic Service		No	23-151Official
344	Patrick	Zomer	pat.zomer@lawmoss.com	Moss & Barnett PA		150 S 5th St #1200 Minneapolis MN, 55402 United States	Electronic Service		No	23-151Official