

September 12, 2025

VIA E-FILING

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

**Re: In the Matter of the Application for a Certificate of Need and Route Permit for the
Appleton to Benson 115 Kilovolt Transmission Line Project.
MPUC Docket Nos. ET2,E017,ET6135,E100/CN-24-263 and TL-24-264**

Dear Ms. Bergman:

Great River Energy, Otter Tail Power Company, Western Minnesota Municipal Power Agency, Agralite Electric Cooperative, and the City of Benson (together, “Applicants”), submit their Comments regarding the Environmental Assessment, including Attachment 1, in the above-referenced docket. A copy of this filing is also being served as designated on the Official Service List on file with the Minnesota Public Utilities Commission. Please let me know if you have any questions regarding this filing

Sincerely,

/s/ Haley Waller Pitts

Haley L. Waller Pitts
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Email: hwallerpitts@fredlaw.com

**STATE OF MINNESOTA
BEFORE THE
PUBLIC UTILITIES COMMISSION**

Katie Sieben
Audrey Partridge
Hwikwon Ham
Joseph K. Sullivan
John Tuma

Chair
Commissioner
Commissioner
Commissioner
Commissioner

In the Matter of the Application of Great River Energy, Otter Tail Power Co., Western Minnesota Municipal Power Agency, Agralite Electric Coop., and the City of Benson for a Certificate of Need and Route Permit for the Appleton to Benson 115-Kilovolt Transmission Line Project

Docket No. ET-2,E-017,ET-6135, E-100/CN-24-263; TL-24-264
OAH Docket No. 23-2500-40748

**APPLICANTS' COMMENTS ON
ENVIRONMENTAL ASSESSMENT &
DRAFT ROUTE PERMIT**

I. INTRODUCTION

Great River Energy, Otter Tail Power Company (Otter Tail Power), Western Minnesota Municipal Power Agency (WMMPA) through its agent Missouri River Energy Services (MRES), Agralite Electric Cooperative (Agralite) and City of Benson (together, Applicants) respectfully submit these comments on the Environmental Assessment (EA) and Draft Route Permit filed by the Minnesota Public Utilities Commission (Commission) Energy Infrastructure Permitting (EIP) Staff on July 31, 2025.¹ Applicants appreciate EIP Staff's detailed review of the Appleton to Benson Project (Project) and offer limited comments below.

II. COMMENTS ON EA

The EA contains a thorough analysis of the potential human and environmental impacts, consistent with the Scoping Decision. Applicants offer only several clarifying and/or additional comments below.

¹ See Ex. PUC-8 (EA).

First, Section 1.4.2 of the EA describes alignments considered in the City of Benson and notes that Applicants are coordinating with BNSF Railway (BNSF) to discuss the licensing process for Alignment 2. Since filing the Application, Applicants have continued to analyze this alignment and to further coordinate with BNSF. Specifically, Applicants have contracted with a consulting engineer to complete a study to determine if the proposed transmission line will cause interference with BNSF's control systems. If the study determines there are unacceptable impacts on BNSF's control systems, mitigation will be proposed and submitted to BNSF for review and approval. Applicants remain optimistic that Alignment 2 will ultimately be feasible, but if further coordination with BNSF renders Alignment 2 infeasible, Applicants agree with the EA's statement that Alignments 1 and 3 are also feasible and located within the Proposed Route.

Second, Section 1.7 of the EA describes the substation upgrades proposed and needed for the Project. While the EA accurately describes these upgrades as stated in the Application, after further coordination with a landowner, the Applicants propose to include additional acreage for the Appleton Transmission and Distribution Substations at the request of the landowner. The landowner requested that the Applicants purchase 20 acres, which includes approximately 3.4 acres that were not included in the proposed route width and depicted in the Application and EA. A map showing this additional land is included on **Attachment 1**. The land is upland currently in agricultural production. Applicants do not currently anticipate construction or placement of facilities on these additional acres, with the potential exception of a portion of a stormwater pond. Applicants request that the Commission include these additional acres in its grant of a route permit, consistent with the landowner's request that the property be included in land acquisition for the Project.

Third, Section 6.5 of the EA discusses archaeological and historic resources. In addition to the analysis already in this section, Applicants note that the Minnesota State Historic Preservation Office (SHPO) recommended a survey for the Project, and Applicants intend to conduct an archaeological survey on the selected route prior to construction.²

Fourth, Section 6.6.6.7.1 of the EA discusses Board of Water and Soil Resources (BWSR) Reinvest in Minnesota (RIM) easements crossed by the Project. The Applicants clarify that while both the transmission line itself (i.e., structures) and the right-of-way (ROW) cross the easement east of Holloway, only the ROW (i.e., no structures) crosses the easements near the City of Benson. The Applicants will work with BWSR to ensure clearing practices where needed within the ROW are consistent with the RIM easement requirements, and regarding the easement east of Holloway, the Applicants will attempt to minimize the siting of structure within the easement.

Fifth, Section 6.6.9.2.1 suggests that the Applicants prepare a “Blanding’s Turtle Avoidance Plan” approved by the Minnesota Department of Natural Resources (MDNR). As discussed below, the Applicants believe preparation of such a plan unnecessary and instead propose a condition that the Applicants comply with applicable MDNR requirements related to the Blanding’s Turtle.

III. COMMENTS ON DRAFT ROUTE PERMIT

A. Special Conditions Proposed by EIP Staff

EIP Staff included a Draft Route Permit as Appendix C to the EA that proposes nine special permit conditions for the Project. Applicants do not object to Proposed Special Conditions 6.3, 6.4, 6.5, and 6.9, and provide additional comments on the remaining conditions below.

² Ex. APP-5 at 108 (Application); Ex. APP-31 at 8 (Direct Testimony of M. Strohhus).

1. *6.1 Impacts to Irrigators*

Proposed Special Condition 6.1 states:

The Permittees shall coordinate with landowners that maintain irrigation equipment within the proposed route to ensure that irrigation operations are not impacted by Project construction or operation. Landowners should be consulted during the Project's design phase to ensure that pole placement and clearances will not negatively impact irrigation operations.

As part of the land acquisition process for the Project, Applicants will coordinate with landowners to identify irrigation equipment and avoid, minimize, and/or mitigate impacts to that equipment. Applicants propose revisions to Proposed Special Condition 6.1 to provide flexibility to Applicants in coordinating with landowners. Although Applicants' primary intention is to avoid impacts to irrigation equipment altogether, to the extent complete avoidance is not possible, Applicants request that the Route Permit acknowledge that mitigation (as part of the easement acquisition process) may also be appropriate in some circumstances. Specifically, Applicants propose:

The Permittees shall coordinate with landowners that maintain irrigation equipment within the proposed route to ensure that impacts to irrigation operations are avoided, minimized, and/or mitigated. This coordination shall include consultation with landowners regarding pole placement. ~~Landowners should be consulted during the Project's design phase to ensure that pole placement and clearances will not negatively impact irrigation operations.~~

2. *6.2 Blanding's Turtle*

Proposed Special Condition 6.2 states:

The Permittees must work with DNR to develop a Blanding's Turtle avoidance plan for those portions of the project DNR determines applicable for the project. The avoidance plan must include measures to be taken to minimize disturbance to the species and seasonal maps of disturbance areas overlayed with the timing of project impacts.

Applicants believe that this condition as proposed is overly broad and inconsistent with MDNR requirements and recommendations made in this docket. First, the MDNR’s January 14, 2024 MCE Correspondence # 2023-00817 does not require an avoidance plan. Rather, it requires an applicant to implement avoidance measures.³ MDNR’s scoping comments filed in this docket also recommend “including a special permit condition that the Applicant will comply with applicable requirements related to state-listed endangered and threatened species in accordance with Minnesota’s Endangered Species Statute (Minnesota Statutes, section 84.0895) and associated Rules (Minnesota Rules, part 6212.1800 to 6212.2300 and 6134).”⁴ Applicants propose a new Special Condition 6.2 to more closely reflect MDNR’s guidance and comments filed in this docket and included in a prior route permit:⁵

The Permittee will comply with applicable Minnesota Department of Natural Resources requirements related to the Blanding’s turtle. The Permittee shall keep records of compliance with this section and provide them upon the request of Commission staff.

3. *6.6 MnDOT Consultation and Coordination*

Proposed Special Condition 6.6 states:

The Permittees shall coordinate with the Minnesota Department of Transportation, including a pole-by-pole analysis once an initial project design has been prepared, prior to construction. In particular, consultation with MnDOT regarding the intersection of US Highway 59, 60th St. SW, and Burlington Northern Railroad, must occur during the design phase to ensure compliance with MnDOT regulations.

³ See MDNR January 18, 2024 Correspondence # MCE 2023-00817.

⁴ MDNR Scoping Comments at 1 (Mar. 28, 2025) (eDocket No. [20253-216974-01](#)).

⁵ See *In the Matter of the Application of Great River Energy for a Route Permit for the 115-kV Pilot Knob to Burnsville Rebuild and Upgrade Project in Dakota County, Minnesota*, MPUC Docket No. ET-2/TL-23-410, Order Adopting Administrative Law Judge Report and Issuing Route Permit as Revised (hereafter *Pilot Knob Order*), Condition No. 6.9 (Dec. 27, 2024).

This proposed special condition is vague, as it is unclear what constitutes a “pole-by-pole analysis” of an initial design prior to construction. Applicants will coordinate with the Minnesota Department of Transportation (MnDOT) and will comply with applicable MnDOT regulations.

The Applicants propose the following revisions to Condition No. 6.6:

The Permittees shall coordinate with the Minnesota Department of Transportation regarding pole placement, where applicable, and will comply with applicable MnDOT regulations. ~~including a pole-by-pole analysis once an initial project design has been prepared, prior to construction. In particular, consultation with~~ Particularly, the Permittees will consult with MnDOT regarding the intersection of US Highway 59, 60th St. SW, and Burlington Northern Railroad, ~~must occur~~ during the design phase to ensure compliance with MnDOT regulations.

4. 6.7 Wellhead Protection

Proposed Special Condition 6.7 states:

The Permittees shall stage all equipment over 200 feet from known well locations. If a spill occurs, Emergency Response Plans for the cities of Appleton and Benson will be followed. A contact list of well owners will be prepared and provided to the Minnesota Department of Health prior to construction. Finally, the transmission lines will be located a sufficient distance from existing wells to allow safe and legal access for maintenance, service, or sealing with a drill rig, or provide accommodation to well owners. This accommodation could include relocation of the well to provide similar chemistry and supply to the owner, and properly abandoning the impacted well.

The Applicants believe this condition is overly broad and is unnecessary as proposed. As noted in the Application, the Applicants will request well information from landowners once a final route is selected, and will coordinate with landowners regarding well access, as needed.⁶

⁶ Ex. APP-5 at 119 (Application).

Instead, Applicants propose a similar condition that the Commission adopted in a recently issued transmission line route permit:⁷

Permittee shall request well information from landowners and coordinate with landowners regarding well access. Permittees shall also obtain copies of the applicable emergency response plans for the cities of Appleton and Benson prior to construction and comply with any applicable requirements. Records of compliance shall be retained by the Permittee, and be provided to the Commission staff upon request.

5. *6.8 Bat Protections*

Proposed Special Condition 6.8 states:

The applicants will avoid tree removal from June 1 through August 15 to avoid impacts to roosting northern long-eared bats.

Applicants propose to revise Section 6.8 to reflect U.S. Fish and Wildlife Service (USFWS) requirements:

The Permittee will coordinate with the U.S. Fish and Wildlife Service regarding the timing of tree clearing and any other conservation measures to mitigate impacts to Northern Long-Eared Bat. The Permittee shall keep records of compliance with this section and provide them upon the request of Commission staff.

The proposed revision reflects that USFWS is the agency responsible for the protected species, and that USFWS guidance has changed over time and may continue to do so. The proposed revision is consistent with other recent route permits issued by the Commission.⁸

⁷ See *Pilot Knob Order*, Condition No. 6.2.

⁸ See, e.g., *Pilot Knob Order* at Condition No. 6.8; *In the Matter of the Application of Great River Energy for a Route Permit for the Reroute of the 115-kV Cedar Lake Transmission Line Project in Scott and Rice Counties*, MPUC Docket No. ET-2/TL-23-170, Order Adopting Administrative Law Judge Report and Issuing Route Permit at Condition No. 6.1 (June 7, 2024); *In the Matter of the Application of Great River Energy for a Route Permit to Rebuild the Existing 69 kV ST-WW Transmission Line to 115 kV in Stearns County, Minnesota*, MPUC Docket No. ET-2/TL-22-235, Order Adopting Administrative Law Judge Report and Issuing Route Permit at Condition No. 6.2 (Oct. 23, 2023); *In the Matter of the Application of Great River Energy and Otter Tail Power Company for a Route Permit for the Frazee to Erie 115 kV Transmission Line Project in Becker and Otter Tail Counties*, MPUC Docket No. E-T2/TL-

B. Revisions Requested by Applicants

Applicants request several additional revisions to the Draft Route Permit, primarily to reflect the technical description of the Project and potential phased construction of the Project.

1. 2.1 Structures

Applicants request a minor revision to Section 2.1 of the Draft Route Permit to reflect a small segment of the Project which will be double circuited, and to reflect how Project structures will be constructed.

The upgraded, newly built, and rebuilt transmission line will include new structures and wires. The majority of the new 115 kV transmission line would consist of single circuit, horizontal post, or braced post monopole wood structures. A short segment in the City of Benson and south of Great River Energy's Benson substation will be double circuited. The structures will be direct-embedded when feasible, and concrete piers will be used to provide the necessary support for ~~embed~~ the poles when direct-embedding is not feasible.

2. 2.2 Conductors

Applicants request a similar minor revision to Section 2.2 of the Draft Route Permit to reflect a small segment of the Project which will be double circuited.

The single circuit structures will have three single conductor phase wires and one shield wire. The double circuit structures will have six single conductor phase wire and one or two shield wires. Additional wires may also be attached if mitigation is required by BNSF along this double-circuited section. The phase wires proposed will be twisted pair conductor with 266 Aluminum Conductor Steel Reinforced (ACSR) or 366 ACSR wire sizes or a conductor with similar capacity. The shield wire will be 0.528 optical ground wire.

20-423, Order Adopting Administrative Law Judge Report and Issuing Route Permit at Condition No. 6.5 (Dec. 17, 2021); *In the Matter of the Application of Dodge County Wind, LLC for a Certificate of Need, a Site Permit, and a Route Permit for the up to 252 MW Large Wind Energy Conversion System and Associated 161 kV Transmission Line in Dodge, Mower, and Steele Counties, Minnesota*, MPUC Docket No. IP-6981/CN-20-865, IP-6981/WS20-866; IP-6981/TL-20-867, Order Granting Certificate of Need, Issuing Site Permit, and Issuing Route Permit at Condition No. 6.8 (June 4, 2024).

3. *5.3.9 Wetlands and Water Resources*

Applicants request inclusion of language below to request flexibility to assemble structures on site, if needed and if such assembly would be less impactful. There is a possibility that it could be more impactful to assemble structures upland, which could require the use of larger, heavier equipment to move the assembled steel structures, resulting in increased compaction in the upland areas. Upland assembly could also require additional matting and workspace to be established in the wetlands to be able to maneuver the structures, which typically exceed 100 feet in height. The proposed revision allows the Applicants the flexibility to proceed with construction in a lesser impactful manner.

The Permittees shall contain soil excavated from the wetlands and riparian areas and not place it back into the wetland or riparian area. The Permittees shall access wetlands and riparian areas using the shortest route possible in order to minimize travel through wetland areas and prevent unnecessary impacts. The Permittees shall not place staging or stringing set up areas within or adjacent to wetlands or water resources, as practicable. The Permittees shall assemble power pole structures on upland areas before they are brought to the site for installation, [as practicable](#).

4. *New Section: Vegetation Clearing*

Applicants request the inclusion of a special permit condition titled “Vegetation Clearing.” The condition describes the circumstances under which the Permittees would be authorized to commence vegetation clearing before the filing of a plan and profile:

If the Permittee will clear vegetation for any portion of the Transmission Facility prior to completion of the design necessary to provide a plan and profile contemplated under Section 9.2, the Permittee shall file with the Commission at least 14 days prior to such vegetation clearing activities:

- If applicable, any vegetation management plan that is applicable to any portion of the Transmission Facility being proposed for vegetation clearing;
- A map showing the area proposed for vegetation removal and its location within the Designated Route and compared to the right-of-way identified in this route permit;
- A statement of confirmation that the Permittee has obtained, or will obtain before commencing, necessary land rights and agency permits for the proposed vegetation removal. The required permits must be provided to the Commission prior to vegetation clearing.
- The Permittee's plan for notifying landowners in the identified area(s) and for providing contact information for the Permittee's field representative; and
- If the Permittee has made any modifications to the right-of-way or alignment within the Designated Route from that identified in this route permit, the Permittee shall demonstrate that the right-of-way to be cleared of vegetation will be located so as to have comparable overall impacts relative to the factors in Minn. R. 7850.4100, as does the right-of-way and alignment identified in this route permit.

Applicants request this condition to reflect the Project's planned phased construction, and because vegetation clearing restrictions related to protected species have the potential to result in construction schedule constraints.⁹

⁹ See *Pilot Knob Order* at Condition No. 6.7; *In the Matter of the Applications of Xcel Energy for a Certificate of Need and Route Permit for the Minnesota Energy Connection Project in Sherburne, Stearns, Kandiyohi, Wright, Meeker, Chippewa, Yellow Medicine, Renville, Redwood, and Lyon counties in Minnesota*, MPUC Docket No. E-002/TL-22-132; E-002/CN-22-131, Order Granting Certificate of Need and Issuing Route Permit (*MNEC Order*) at Condition No. 6.3; *In the Matter of the Application of Minnesota Power and Great River Energy for a Certificate of Need and Route Permit for an Approximately 180-mile, Double Circuit 345- kV Transmission Line*, MPUC Docket No. E-015, ET-2/TL-22-415; E-015, ET-2/CN-22-416, Order Granting Certificate of Need and Issuing Route Permit (*NRP Order*) at Order Condition No. 6.6.

5. *New Section: Substation Construction*

Applicants also request a new section that addresses the timing of substation construction, in acknowledgement that substation construction may be commenced prior to other portions of the Project to maintain the Project schedule:

Notwithstanding any other requirements in this Permit, Permittee may commence construction of the substations identified in Section 2.3 of this Permit, provided that Permittee complies, as applicable, with Sections 9.1 and 9.2 of this Permit with respect to the specific scope of the construction activities sought to be conducted by Permittee.¹⁰

IV. CONCLUSION

Applicants appreciate the opportunity to provide these comments and respectfully submit that the record supports the issuance of a Certificate of Need and Route Permit for the Project, with the provisions discussed in these Comments.

DATED: September 12, 2025

Respectfully submitted,

s/ Haley Waller Pitts

Haley Waller Pitts

Cody M. Bauer

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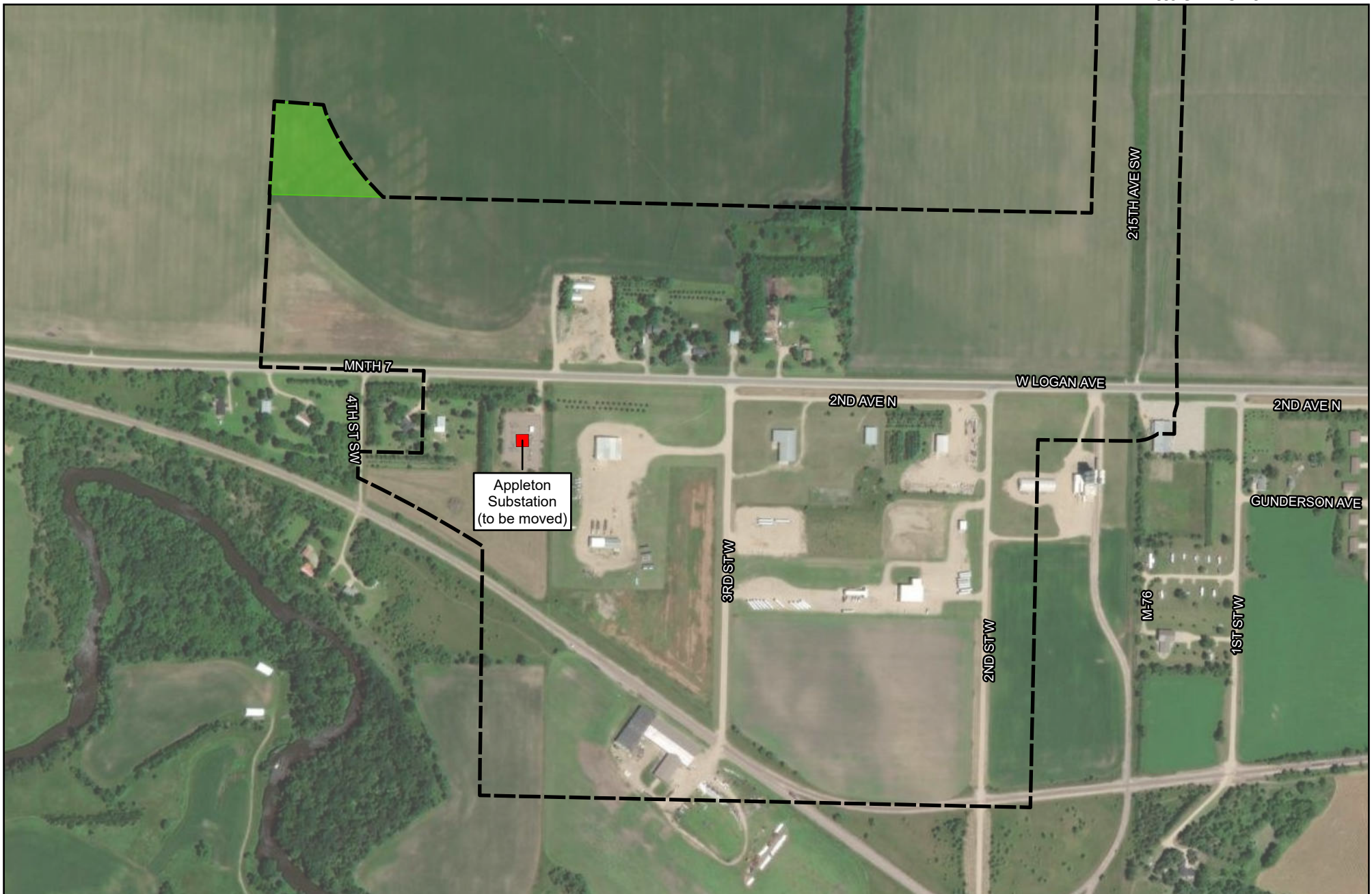
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Attorneys for Applicants

¹⁰ MNEC Order at Condition No. 6.5; NRP Order at Condition No. 6.7.



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Appleton to Benson 115-kV Transmission Line Project **Expanded Route Width at Appleton Substation** Swift County, Minnesota

- Substation
- Expanded Route Width
- Expanded Area

**In the Matter of the Application for a
Certificate of Need and Route Permit for
the Appleton to Benson 115 Kilovolt
Transmission Line Project
MPUC Docket Nos.
ET2,E017,ET6135,E100/CN-24-263 and
TL-24-264**

CERTIFICATE OF SERVICE

Breann L. Jurek certifies that on the 12th day of September, 2025, she e-filed on behalf of Applicants, a true and correct copy of their Comments on the Environmental Assessment, including Attachment 1, with the Minnesota Public Utilities Commission via eDockets (www.edockets.state.mn.us). Said documents were also served on the Official Service Lists of record on file with the Minnesota Public Utilities Commission and as attached hereto.

Executed on: September 12, 2025

Signed: /s/ Breann L. Jurek

Fredrikson & Byron, P.A.
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1	Lisa	Agrimonti	lagrimonti@fredlaw.com	Fredrikson & Byron, P.A.		60 South Sixth Street Suite 1500 Minneapolis MN, 55402-4400 United States	Electronic Service		No	24-263CN-24-263
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3	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	24-263CN-24-263
4	Sharon	Ferguson	sharon.ferguson@state.mn.us		Department of Commerce	85 7th Place E Ste 280 Saint Paul MN, 55101-2198 United States	Electronic Service		No	24-263CN-24-263
5	Thomas	Hoffman	thoffman@agralite.com	Agralite Electric Cooperative		320 Highway 12 SE Benson MN, 56215 United States	Electronic Service		No	24-263CN-24-263
6	Breann	Jurek	bjurek@fredlaw.com	Fredrikson & Byron PA		60 S Sixth St Ste 1500 Minneapolis MN, 55402 United States	Electronic Service		No	24-263CN-24-263
7	Kris	Koch	kkoch@otpc.com	Otter Tail Power Company		215 S. Cascade Street Fergus Falls MN, 56537 United States	Electronic Service		No	24-263CN-24-263
8	Stephen	Kowal	skowal@bensonmnlaw.com	Wilcox Law Office, P.A.		1150 Wisconsin Avenue Benson MN, 56215 United States	Electronic Service		No	24-263CN-24-263
9	David C.	McLaughlin	dmclaughlin@fluegellaw.com	Western Minnesota Municipal Power Agency		129 2nd Street Ortonville MN, 56278 United States	Electronic Service		No	24-263CN-24-263
10	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	24-263CN-24-263
11	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	24-263CN-24-263
12	Mark	Strohfus	mstrohfus@grenergy.com	Great River Energy		12300 Elm Creek Boulevard Maple Grove MN, 55369-4718 United States	Electronic Service		No	24-263CN-24-263
13	Haley	Waller Pitts	hwallerpitts@fredlaw.com	Fredrikson & Byron, P.A.		60 S Sixth St Ste 1500 Minneapolis MN, 55402-4400 United States	Electronic Service		No	24-263CN-24-263

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14	Brian	Zavesky	brianz@mrenergy.com	Missouri River Energy Services		3724 West Avera Drive P.O. Box 88920 Sioux Falls SD, 57108-8920 United States	Electronic Service		No	24-263CN-24-263

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2	Cody M.	Bauer	cbauer@fredlaw.com	Fredrikson & Byron, P.A.		60 South 6th Street, Suite 1500 Minneapolis MN, 55402 United States	Electronic Service		No	24-264TL-24-264
3	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	24-264TL-24-264
4	Sharon	Ferguson	sharon.ferguson@state.mn.us		Department of Commerce	85 7th Place E Ste 280 Saint Paul MN, 55101-2198 United States	Electronic Service		No	24-264TL-24-264
5	Thomas	Hoffman	thoffman@agralite.com	Agralite Electric Cooperative		320 Highway 12 SE Benson MN, 56215 United States	Electronic Service		No	24-264TL-24-264
6	Breann	Jurek	bjurek@fredlaw.com	Fredrikson & Byron PA		60 S Sixth St Ste 1500 Minneapolis MN, 55402 United States	Electronic Service		No	24-264TL-24-264
7	Kris	Koch	kkoch@otpc.com	Otter Tail Power Company		215 S. Cascade Street Fergus Falls MN, 56537 United States	Electronic Service		No	24-264TL-24-264
8	Stephen	Kowal	skowal@bensonmnlaw.com	Wilcox Law Office, P.A.		1150 Wisconsin Avenue Benson MN, 56215 United States	Electronic Service		No	24-264TL-24-264
9	David C.	McLaughlin	dmclaughlin@fluegellaw.com	Western Minnesota Municipal Power Agency		129 2nd Street Ortonville MN, 56278 United States	Electronic Service		No	24-264TL-24-264
10	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	24-264TL-24-264
11	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	24-264TL-24-264
12	Mark	Strohufus	mstrohufus@grenergy.com	Great River Energy		12300 Elm Creek Boulevard Maple Grove MN, 55369-4718 United States	Electronic Service		No	24-264TL-24-264
13	Haley	Waller Pitts	hwallerpitts@fredlaw.com	Fredrikson & Byron, P.A.		60 S Sixth St Ste 1500 Minneapolis MN, 55402-4400 United States	Electronic Service		Yes	24-264TL-24-264

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