



December 4, 2024

Will Seuffert, Executive Secretary  
Minnesota Public Utilities Commission  
121 7<sup>th</sup> Place East, Suite 350  
Saint Paul, MN 55101-2147

***Subject: Dakota Electric Association Supplement Reply Comments in Response to October 9, 2024 Notice of Comment Period***

***In the Matter of a Commission Investigation on Grid and Customer Security Issues Related to Public Display or Access to Electric Distribution Grid Data.  
Docket No. E999/CI-20-800***

Dear Mr. Seuffert:

Dakota Electric Association (Dakota Electric or Cooperative) respectfully submits these supplemental reply comments in response to the Minnesota Public Utilities Commission's (Commission) October 9, 2024 Notice of Supplemental Comment Period (October 2024 Notice) in the above referenced docket.

**I. Background**

On October 30, 2020, the Commission opened an *Investigation on Grid and Customer Security Issues Related to Public Display or Access to Electric Distribution Grid Data* in Docket No. E999/CI-20-800. Throughout 2021 and 2022, Dakota Electric, the other investor-owned utilities (IOUs), and interested parties filed various rounds of comments providing the Commission with additional information on the topic of grid security and distribution grid data sharing. The Commission also issued Orders on August 3, 2022 and June 7, 2023 in this investigation. In its June 7, 2023 Order, the

Commission authorized further workgroup discussion regarding grid security and grid data access. The Commission also adopted Dakota Electric’s proposal to provide discrete sets of information on-demand, in the context of other existing DER interconnection tools and improvements being considered, to maintain an orderly, efficient, and cost-effective deployment of DER in Minnesota.

On July 2, 2024, the Commission issued a Notice of Workgroup (Workgroup Notice) scheduling workgroup meetings in response to the Commission’s June 7, 2023 Order. Dakota Electric was an active participant in these workgroup meetings and appreciated the open and transparent discussion from various parties. Concurrent to the October 2024 Notice, Commission Staff also filed its summary of the workgroup discussions and its recommendations and next steps.

On November 12, 2024, the Cooperative filed supplemental comments in response to the Commission’s October Notice. In these comments, Dakota Electric recommended that the Commission establish a workgroup to make use of the NARUC Grid Data Sharing Framework.

The following parties also filed comments in response to the Commission’s Notice:

- Xcel Energy (Xcel)
- Minnesota Power;
- Otter Tail Power Company (Otter Tail);
- Minnesota Department of Commerce, Division of Energy Resources (Department);
- Minnesota Grid Access Advocates (Grid Advocates); and
- Nokomis Energy (Nokomis)

The Department provided a robust discussion around security risks, a thorough overview of the NARUC Framework, and provided a Grid Data Sharing Report from their security consultant, Converge Strategies, LLC. This Grid Data Sharing Report covers security risks to the electric grid, existing threat landscape analysis, recommendations for

a data sharing process implementation, and recommendations for stakeholder working group discussions.

Xcel Energy's comments largely align with the Cooperative's comments. Xcel also provided additional conversation regarding data privacy and concluded that consumer privacy is an integral part of the NARUC Framework but specifically noted that Commission's October 30, 2020 Notice stated that changes to customer privacy policies are not included in the scope of this docket.<sup>1</sup>

## **II. Dakota Electric Supplemental Reply Comments**

Based on our review of other party comments, it appears that most parties reached a similar conclusion, which is generally in line with the workgroup's conclusion, that the Commission should authorize use of the NARUC Grid Data Sharing Framework for grid data access matters. Additionally, the majority of the commentators recommended a standing Grid Security Work Group to address grid data access and security questions. As noted in our supplemental comments, the Cooperative agrees that maintaining a standing workgroup is appropriate and a reasonable approach to deal with these matters in the future.

Several commentors, including the Cooperative, noted the need for flexibility between different utilities when using the NARUC Grid Data Sharing Framework. In particular, Dakota Electric stated in part that "... the framework provides a structure..." and "It is intended to be flexible."<sup>2</sup> Dakota Electric believes that using the NARUC framework provides adequate flexibility to deal with unique use cases in this ever-evolving environment.

As noted earlier in these comments, the Cooperative commends the Department, and their security consultant Converge Strategies, for their work with parties compiling information and the detailed Grid Data Sharing Report (Converge Report).<sup>3</sup> The Cooperative agrees with the Department's recommendation to utilize the

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<sup>1</sup> Xcel Energy November 12, 2024 Supplemental Comments, Page 9.

<sup>2</sup> Dakota Electric Supplemental Comments, Page 4.

<sup>3</sup> Department November 12, 2024 Supplemental Comments, *Grid Data Sharing Report*, Pages 21-49.

Converge Report for additional work group sessions. Further, the Cooperative agrees with the Department's recommendations<sup>4</sup> with this slight modification:

- B.2 The Department recommends the Commission require the workgroup to provide ~~its final~~ a report with recommendations regarding a data sharing process for DER interconnection within six months of the issue date of the Order.

The Cooperative requests this minor adjustments because we believe it is imperative that the report filed with the Commission not be considered "final" as the NARUC framework allows, and envisions, an iterative process that continually evolves and evaluates the data sharing landscape. Dakota Electric sees the workgroup, and its accompanying analyses and recommendations, as a living or on-going process, which is why the Cooperative recommends that the Commission consider requiring the standing workgroup to file a yearly memorandum/letter regarding the use of grid data framework. In this memorandum/letter, the workgroup could, amongst other items, inform the Commission of past, current, or future grid security issues.

Additionally, the Cooperative believes that a collaborative approach between utilities and DER developers is a reasonable path forward. As discussed at length in this record, and approved by the Commission in its June 7, 2023 Order, Dakota Electric developed, and currently uses, an internal DER screening tool. Based on discussions in the workgroup, and our review of comments from developers, we believe that our method is a means by which developers can obtain some locational based hosting capacity and system information without compromising grid security. Furthermore, we believe that this screening tool, coupled with discussions with internal utility engineering staff, can create a collaborative environment where utilities and developers are able to cost effectively and efficiently interconnect DER resources in the most system and societally beneficial way possible.

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<sup>4</sup> Department supplemental comments November 12, 2024, Page 18.

Based on our review of party comments, Dakota Electric believes it is important that the Commission consider and provide insight into data access privileges. Specifically, Dakota Electric found the Department's discussion regarding data sharing tactics useful:

Data sharing tactics refers to the approaches that can be implemented to mitigate potential negative impacts of grid data sharing. Tactics include vetting processes for data recipients, legal protections, NDAs, secure portals, and others. The Converge Report offers implementation recommendations pertinent to data sharing tactics, specifically the discussion of data identification and classification and tiered access and disclosure. Data sharing tactics are critical to ensure that risks can be sufficiently mitigated while facilitating greater access, i.e. the presence of risk does not require complete restriction. While the presence of data sharing tactics may still present a hurdle to data access, the continuum of tactics that are available should allow for risk mitigation that is appropriately matched to the data requested. Providing greater access to data, even if partially reliant on specific tactics, still represents progress and should be supported by all parties.<sup>5</sup>

Dakota Electric agrees with the above discussion. Although data sharing tactics may at times slow data access, it is vital to maintain data protection and elevated data risk requires an elevated data access requirement. Xcel also concluded that there needs to be security standards for different parties by asking the Commission to, "Grant utilities the discretion to withhold data from parties that do not meet these established security standards."<sup>6</sup> Dakota Electric recommends that the Commission provide a directive to the work group regarding data access prior to utilizing the NARUC Framework. The Cooperative believes that the Department's Comments, the Converge Report, and Xcel's Comments all lead to the principle of least data access, also known as least privilege, for any potential data sharing framework. Specifically, Dakota Electric recommends that the Commission direct the workgroup to follow the principle of least data access regarding data sharing when implementing the NARUC framework.

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<sup>5</sup> Department November 12, 2024 Supplemental Comments, Page 15.

<sup>6</sup> Xcel Energy November 12, 2024 Supplemental Comments, Page 11.

As noted above, and in Xcel's comments,<sup>7</sup> the Commission's original notice opening this investigation stated that changes to customer privacy policies are not in scope. In light of this directive, the Commission, the workgroup, and parties should exercise caution when making recommendations that could result in the provision of more consumer specific data. Dakota Electric notes that we have existing Cooperative Board Policies governing the sharing of individual member data. These policies must be followed under any data sharing process/framework and any data points that reflect individual member data must be removed from a data sharing process unless approved in writing by an individual member. Dakota Electric notes that each individual member has the rights to data associated with their service, and it is Dakota Electric's responsibility to make sure that we protect and manage these data in accordance with the Cooperative's Board policies and procedures regarding personal privacy.

### **III. Conclusion**

Dakota Electric believes that creating a standing workgroup to utilize the NARUC Grid Data Sharing Framework is the most appropriate path forward for matters regarding grid data sharing. The Cooperative believes this framework, along with the Converge Report, will allow the workgroup to develop a proper set of data sharing guidelines, tools to protect data and minimize risk, and identify mechanisms for proper data sharing that are able to evolve in a changing landscape while acknowledging the unique operating circumstances of Minnesota utilities. We also recommend that the Commission direct the workgroup, when developing these data sharing guidelines, to follow the principle of least data access.

Dakota Electric and its representatives are available to answer any questions that the Commission may have.

Sincerely,

/s/ Alex Nelson

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<sup>7</sup> Xcel Energy November 12, 2024 Supplemental Comments, Page 9.

Alex Nelson  
Electrical Engineer  
651-463-6186  
anelson@dakotaelectric.com

/s/ Adam Heinen

Adam Heinen  
Vice President of Regulatory Services  
651-463-6258  
aheinen@dakotaelectric.com

Dakota Electric Association  
4300 220<sup>th</sup> Street West  
Farmington, MN 55024

**Certificate of Service**

I, Nicole McEathron, hereby certify that I have this day served copies of the attached document to those on the following service list by e-filing, personal service, or by causing to be placed in the U.S. mail at Farmington, Minnesota.

**Docket No. E-999/CI-20-800**

Dated this 4th day of December 2024

*/s/ Nicole McEathron*

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Nicole McEathron

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
1	Roxanne	Achman	rachman@co.benton.mn.us			531 Dewey Street Foley MN, 56329 United States	Electronic Service		No	20-800Official
2	Chad	Adams	chada@swmhp.org	Southwest Minnesota Housing Partnership		2401 Broadway Ave Slayton MN, 56172 United States	Electronic Service		No	20-800Official
3	Michael	Ahern	ahern.michael@dorsey.com	Dorsey & Whitney, LLP		50 S 6th St Ste 1500 Minneapolis MN, 55402-1498 United States	Electronic Service		No	20-800Official
4	Michael	Allen	michael.allen@allenergysolar.com	All Energy Solar		721 W 26th st Suite 211 Minneapolis MN, 55405 United States	Electronic Service		No	20-800Official
5	Arnie	Anderson	arnieanderson@minncap.org	Minnesota Community Action Partnership		MCIT Building 100 Empire Drive, Suite 202 St. Paul MN, 55103 United States	Electronic Service		No	20-800Official
6	Kristine	Anderson	kanderson@greatermngas.com	Greater Minnesota Gas, Inc.		1900 Cardinal Lane PO Box 798 Faribault MN, 55021 United States	Electronic Service		No	20-800Official
7	Sarah	Anderson	sa@bomampls.org	Greater Minneapolis BOMA		Suite 610 121 South 8th Street Minneapolis MN, 55402 United States	Electronic Service		No	20-800Official
8	Nichol	Beckstrand	nichol.beckstrand@mmha.com	Minnesota Multi Housing Association		1600 W 82nd St Ste 110 Minneapolis MN, 55431 United States	Electronic Service		No	20-800Official
9	James J.	Bertrand	james.bertrand@stinson.com	STINSON LLP		50 S 6th St Ste 2600 Minneapolis MN, 55402 United States	Electronic Service		No	20-800Official
10	Martin S.	BeVier	bevi0022@umn.edu			4001 Grand Ave South # 3 Minneapolis MN, 55409 United States	Electronic Service		No	20-800Official
11	Jon	Braman	jbraman@brightpower.com	Bright Power, Inc.		11 Hanover Square, 21st floor New York NY, 10005 United States	Electronic Service		No	20-800Official
12	Sheri	Brezinka	sbrezinka@usgbcmn.org			701 Washington Ave. N Suite 200 Minneapolis MN, 55401 United States	Electronic Service		No	20-800Official
13	Annika	Brindel	abrindel@nhtinc.org	National Housing Trust		1101 30th Street NW Ste 100A	Electronic Service		No	20-800Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						Washington DC, 20007 United States				
14	Matthew	Brodin	mbrodin@allete.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	20-800Official
15	James	Canaday	james.canaday@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	Suite 1400 445 Minnesota St. St. Paul MN, 55101 United States	Electronic Service		No	20-800Official
16	Richard	Carter	rick.carter@lhbcorp.com			2780 Shadywood Rd Excelsior MN, 55331-9599 United States	Electronic Service		No	20-800Official
17	Brent	Christensen	brentc@mnta.org	Minnesota Telecom Alliance		1000 Westgate Drive, Ste 252 St. Paul MN, 55114 United States	Electronic Service		No	20-800Official
18	Andrew	Clearwater		Future of Privacy Forum		1400 I St NW Ste 450 Washington DC, 20005-6503 United States	Paper Service		No	20-800Official
19	John	Coffman	john@johncoffman.net	AARP		871 Tuxedo Blvd. St. Louis MO, 63119-2044 United States	Electronic Service		No	20-800Official
20	Roger	Colton	roger@fsconline.com			34 Warwick Road Belmont MA, 02478 United States	Electronic Service		No	20-800Official
21	Sheri	Comer	sheri.comer@ftr.com	Frontier Communications Corporation		1500 MacCorkle Ave SE Charleston WV, 25396 United States	Electronic Service		No	20-800Official
22	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	20-800Official
23	George	Crocker	gwillc@nawo.org	North American Water Office		5093 Keats Avenue Lake Elmo MN, 55042 United States	Electronic Service		No	20-800Official
24	Stacy	Dahl	sdahl@minnkota.com	Minnkota Power Cooperative, Inc.		5301 32nd Ave S Grand Forks ND, 58201 United States	Electronic Service		No	20-800Official
25	Steve	Downer	sdowner@mmua.org	MMUA		3025 Harbor Ln N Ste 400 Plymouth MN, 55447-5142 United States	Electronic Service		No	20-800Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
26	John	Farrell	jfarrell@ilsr.org	Institute for Local Self-Reliance		2720 E. 22nd St Institute for Local Self-Reliance Minneapolis MN, 55406 United States	Electronic Service		No	20-800Official
27	Trent	Fellers	trent.fellers@windstream.com	Windstream		1440 M St Lincoln NE, 68508 United States	Electronic Service		No	20-800Official
28	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	20-800Official
29	Jenny	Glumack	jenny@mrea.org	Minnesota Rural Electric Association		11640 73rd Ave N Maple Grove MN, 55369 United States	Electronic Service		No	20-800Official
30	Bill	Gullickson	wdgv76@yahoo.com			1819 Colfax Avenue S Minneapolis MN, 55403 United States	Electronic Service		No	20-800Official
31	Adam	Heinen	aheinen@dakotaelectric.com	Dakota Electric Association		4300 220th St W Farmington MN, 55024 United States	Electronic Service		No	20-800Official
32	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	20-800Official
33	Caroline	Horton	chorton@aeonmn.org	Aeon		901 N 3rd St Ste 150 Minneapolis MN, 55401 United States	Electronic Service		No	20-800Official
34	Alan	Jenkins	aj@jenkinsatlaw.com	Jenkins at Law		2950 Yellowtail Ave. Marathon FL, 33050 United States	Electronic Service		No	20-800Official
35	Craig	Johnson	cjohnson@lmc.org	League of Minnesota Cities		145 University Ave. W. Saint Paul MN, 55103-2044 United States	Electronic Service		No	20-800Official
36	Richard	Johnson	rick.johnson@lawmoss.com	Moss & Barnett		150 S. 5th Street Suite 1200 Minneapolis MN, 55402 United States	Electronic Service		No	20-800Official
37	Sarah	Johnson Phillips	sjphillips@stoel.com	Stoel Rives LLP		33 South Sixth Street Suite 4200 Minneapolis MN, 55402 United States	Electronic Service		No	20-800Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
38	Nicolle	Kupser	nkupser@greatermngas.com	Greater Minnesota Gas, Inc.		1900 Cardinal Ln PO Box 798 Faribault MN, 55021 United States	Electronic Service		No	20-800Official
39	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	20-800Official
40	Peder	Larson	plarson@larkinhoffman.com	Larkin Hoffman Daly & Lindgren, Ltd.		8300 Norman Center Drive Suite 1000 Bloomington MN, 55437 United States	Electronic Service		No	20-800Official
41	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	20-800Official
42	Todd	Liljenquist	todd.liljenquist@mmha.com	Minnesota Multi Housing Association (MHA)		1600 West 82nd Street, Suite 110 Minneapolis MN, 55431 United States	Electronic Service		No	20-800Official
43	Kavita	Maini	kmaini@wi.rr.com	KM Energy Consulting, LLC		961 N Lost Woods Rd Oconomowoc WI, 53066 United States	Electronic Service		No	20-800Official
44	Sarah	Marquardt	smarquardt@mcknight.org	The McKnight Foundation		710 S 2nd St Minneapolis MN, 55401 United States	Electronic Service		No	20-800Official
45	J.B.	Matthews		Cushman & Wakefield/NorthMarq		3500 American Blvd W - #200 Minneapolis MN, 55431 United States	Paper Service		No	20-800Official
46	Craig	McDonnell	craig.mcdonnell@state.mn.us		Minnesota Pollution Control Agency	520 Lafayette Road St. Paul MN, 55101 United States	Electronic Service		No	20-800Official
47	Matthew	Melewski	matthew@theboutiquefirm.com	Nokomis Energy LLC & Ole Solar LLC		2639 Nicollet Ave Ste 200 Minneapolis MN, 55408 United States	Electronic Service		No	20-800Official
48	Joseph	Meyer	joseph.meyer@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	Bremer Tower, Suite 1400 445 Minnesota Street St Paul MN, 55101-2131 United States	Electronic Service		No	20-800Official
49	Stacy	Miller	stacy.miller@minneapolismn.gov	City of Minneapolis		350 S. 5th Street Room M 301 Minneapolis MN, 55415 United States	Electronic Service		No	20-800Official
50	David	Moeller	dmoeller@allete.com	Minnesota Power			Electronic Service		No	20-800Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
51	Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP		33 South Sixth St Ste 4200 Minneapolis MN, 55402 United States	Electronic Service		No	20-800Official
52	Pouya	Najmaie	najm0001@gmail.com	Cooperative Energy Futures		3416 16th Ave S Minneapolis MN, 55407 United States	Electronic Service		No	20-800Official
53	David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency		220 South Sixth Street Suite 1300 Minneapolis MN, 55402 United States	Electronic Service		No	20-800Official
54	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	20-800Official
55	Logan	O'Grady	logrady@mnseia.org	Minnesota Solar Energy Industries Association		2288 University Ave W St. Paul MN, 55114 United States	Electronic Service		No	20-800Official
56	Carol A.	Overland	overland@legalectric.org	Legalelectric - Overland Law Office		1110 West Avenue Red Wing MN, 55066 United States	Electronic Service		No	20-800Official
57	Greg	Palmer	gpalmer@greatermngas.com	Greater Minnesota Gas, Inc.		1900 Cardinal Ln PO Box 798 Faribault MN, 55021 United States	Electronic Service		No	20-800Official
58	Eric	Pasi	ericp@ips-solar.com	IPS Solar		2670 Patton Rd Roseville MN, 55113 United States	Electronic Service		No	20-800Official
59	Jennifer	Peterson	jjpeterson@mnpower.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	20-800Official
60	Kristen	Peterson	kristenp@ips-solar.com	New Energy Equity		2670 Patton Road Roseville MN, 55113 United States	Electronic Service		No	20-800Official
61	Gordon	Pietsch	gpietsch@grenergy.com	Great River Energy		12300 Elm Creek Blvd. Maple Grove MN, 55369-4718 United States	Electronic Service		No	20-800Official
62	Phyllis	Reha	phyllisreha@gmail.com			3656 Woodland Trail Eagan MN, 55123 United States	Electronic Service		No	20-800Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
63	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	20-800Official
64	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	20-800Official
65	Christine	Schwartz	regulatory.records@xcelenergy.com	Xcel Energy		414 Nicollet Mall FL 7 Minneapolis MN, 55401-1993 United States	Electronic Service		No	20-800Official
66	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	20-800Official
67	Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates		7400 Lyndale Ave S Ste 190 Richfield MN, 55423 United States	Electronic Service		No	20-800Official
68	Bria	Shea	bria.e.shea@xcelenergy.com	Xcel Energy		414 Nicollet Mall Minneapolis MN, 55401 United States	Electronic Service		No	20-800Official
69	Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.		76 W Kellogg Blvd St. Paul MN, 55102 United States	Electronic Service		No	20-800Official
70	Peggy	Sorum	peggy.sorum@centerpointenergy.com	CenterPoint Energy		505 Nicollet Mall Minneapolis MN, 55402 United States	Electronic Service		No	20-800Official
71	Sky	Stanfield	stanfield@smwlaw.com	Shute, Mihaly & Weinberger		396 Hayes Street San Francisco CA, 94102 United States	Electronic Service		No	20-800Official
72	Byron E.	Starns	byron.starns@stinson.com	STINSON LLP		50 S 6th St Ste 2600 Minneapolis MN, 55402 United States	Electronic Service		No	20-800Official
73	Richard	Stasik	richard.stasik@wecenergygroup.com	Minnesota Energy Resources Corporation (HOLDING)		231 West Michigan St - P321 Milwaukee WI, 53203 United States	Electronic Service		No	20-800Official
74	Kristin	Stastny	kstastny@taftlaw.com	Taft Stettinius & Hollister LLP		2200 IDS Center 80 South 8th Street Minneapolis MN, 55402 United States	Electronic Service		No	20-800Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
75	Cary	Stephenson	cstephenson@otpc.com	Otter Tail Power Company		215 South Cascade Street Fergus Falls MN, 56537 United States	Electronic Service		No	20-800Official
76	James M	Strommen	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered		150 S 5th St Ste 700 Minneapolis MN, 55402 United States	Electronic Service		No	20-800Official
77	Eric	Swanson	eswanson@winthrop.com	Winthrop & Weinstine		225 S 6th St Ste 3500 Capella Tower Minneapolis MN, 55402-4629 United States	Electronic Service		No	20-800Official
78	Jason	Topp	jason.topp@lumen.com	Qwest Communications Company, LLC.		200 S 5th St Ste 2200 Minneapolis MN, 55402 United States	Electronic Service		No	20-800Official
79	Jenna	Warmuth	jwarmuth@mnpower.com	Minnesota Power		30 W Superior St Duluth MN, 55802-2093 United States	Electronic Service		No	20-800Official
80	Sarah	Whebbe	swhebbe@mnseia.org	MnSEIA		445 Minnesota Street Suite 730 St. Paul MN, 55101 United States	Electronic Service		No	20-800Official
81	Patricia	Whitney	patricia@pwhitneylaw.com	St. Paul Assn of Responsible Landlords		627 Snelling Avenue South St. Paul MN, 55116 United States	Electronic Service		No	20-800Official
82	Joseph	Windler	jwindler@winthrop.com	Winthrop & Weinstine		225 South Sixth Street, Suite 3500 Minneapolis MN, 55402 United States	Electronic Service		No	20-800Official
83	Robyn	Woeste	robynwoeste@alliantenergy.com	Interstate Power and Light Company		200 First St SE Cedar Rapids IA, 52401 United States	Electronic Service		No	20-800Official
84	Yochi	Zakai	yzakai@smwlaw.com	SHUTE, MIHALY & WEINBERGER LLP		396 Hayes Street San Francisco CA, 94102 United States	Electronic Service		No	20-800Official
85	Curtis	Zaun	czaun@mnseia.org	MnSEIA		PO Box 8141 Saint Paul MN, 55108 United States	Electronic Service		No	20-800Official
86	Kurt	Zimmerman	kwz@ibew160.org	Local Union #160, IBEW		2909 Anthony Ln St Anthony Village MN, 55418-3238 United States	Electronic Service		No	20-800Official
87	Patrick	Zomer	pat.zomer@lawmoss.com	Moss & Barnett PA		150 S 5th St #1200 Minneapolis MN, 55402 United States	Electronic Service		No	20-800Official

