

March 19, 2026

**PUBLIC DOCUMENT**

Sasha Bergman  
Minnesota Public Utilities Commission  
121 7th Place East, Suite 350  
St. Paul, Minnesota 55101-2147

RE: PUBLIC Comments of the Minnesota Department of Commerce  
Docket No. E002/RP-24-67

Dear Ms. Bergman,

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

*In the Matter of Northern States Power Company d/b/a Xcel Energy's Petition for Approval of Generator Projects for MISO's Expedited Resource Addition Study.*

The Petition was filed by Northern States Power Company, doing business as Xcel Energy on February 20, 2026.

The Department recommends **approval** and is available to answer any questions the Minnesota Public Utilities Commission may have.

Sincerely,

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

RS/ad  
Attachment

## Before the Minnesota Public Utilities Commission

### PUBLIC Comments of the Minnesota Department of Commerce

Docket No. E002/RP-24-67

#### I. INTRODUCTION

Northern States Power Company, doing business as Xcel Energy (Xcel or the Company) submitted a petition for approval of two projects for which the Company submitted an Expedited Resource Addition Study (ERAS) application to the Midcontinent Independent System Operator, Inc. (MISO). The projects are:

- 300 MW Nobles Battery Energy Storage System (BESS); and
- 300 MW Sherco South BESS (collectively, ERAS Portfolio 2).<sup>1</sup>

Both projects have been included in the ERAS Study Cycle 3.<sup>2</sup> A brief description of the projects in the Petition is shown in Table 1.

**Table 1: Overview of Xcel’s Proposed ERAS Portfolio 2<sup>3</sup>**

Project Name	Location	Project Owner	Type	Installed Capacity	COD	Levelized Cost of Capacity (\$/kW-month)
						<b>TRADE SECRET</b>
<b>Nobles</b>	Nobles County	Xcel	BESS	300 MW	Q2 2028	<b>DATA HAS BEEN EXCISED]</b>
<b>Sherco South</b>	Becker County	Xcel	BESS	300 MW	Q4 2027	<b>DATA HAS BEEN EXCISED]</b>

First, note that the Sherco South BESS was included in Xcel’s petition for approval of the Company’s 2024 Request For Proposals (2024 RFP).<sup>4</sup> Regarding this second request for the Sherco South BESS Xcel states, “[w]hile the project was initially planned as surplus interconnection at the Sherburne County Substation, the Company now believes that, with the timing shift introduced by the ERAS process, independent interconnection through MISO’s ERAS process offers greater value to both the project and the broader system by enabling valuable additional interconnection rights.”<sup>5</sup> The estimated cost increase from the 2024 RFP to the Petition (the switch from Surplus Interconnection to ERAS Interconnection) shown in the Petition’s Table 2 amounts to **[TRADE SECRET DATA HAS BEEN EXCISED]**

Second, for comparison, regarding the 2024 RFP, the Petition shows that the Levelized Cost of Capacity (LCOC) for the selected projects varied between **[TRADE SECRET DATA HAS BEEN EXCISED]** Excluding

<sup>1</sup> In the Matter of Northern States Power Company d/b/a Xcel Energy’s Petition for Approval of Generator Projects for MISO’s Expedited Resource Addition Study (ERAS), Xcel Energy, Petition, February 20, 2026, Docket No. E002/RP-24-67, (eDockets) [20262-228426-02](#), (hereinafter “Petition”).

<sup>2</sup> See [MISO ERAS Interconnection Requests](#). The webpage was downloaded on March 4, 2026.

<sup>3</sup> Petition at 9-10.

<sup>4</sup> See Docket No. E002/M-24-230 for details.

<sup>5</sup> Petition at 12.

Sherco South BESS with Surplus Interconnection the LCOC varied between **[TRADE SECRET DATA HAS BEEN EXCISED]**

A summary of Xcel’s recent filings showing total installed capacity by resource type is shown in Table 2.

**Table 2: Summary of Recent Resource Acquisitions (MW)**

Docket No.	Proceeding	Combined Cycle	Combustion Turbine	BESS	Solar
CN-23-212 <sup>6</sup>	800 MW Petition	375	777	412	-
CN-23-212 <sup>7</sup>	800 MW Supplement	-	-	80	-
M-24-230 <sup>8</sup>	2024 RFP Petition	-	-	556	768
RP-24-67 <sup>9</sup>	ERAS Portfolio 1	-	45	500	-
RP-24-67 <sup>10</sup>	ERAS Portfolio 2	-	-	600	-
Sum		375	822	2,148	768

The additions in Table 2 include the projects in this proceeding and other proceedings that are recently completed or currently on-going. In addition to the acquisitions shown in Table 2 at an earlier date Xcel requested Commission verification for the MISO ERAS process for another 650 MW of projects.<sup>11</sup> Also, Xcel is also in the process of acquiring 1,500 MW of wind and expects to file for approval in the first quarter of 2026.<sup>12</sup>

<sup>6</sup> For the PPA projects see: *In the Matter of Xcel Energy’s Competitive Resource Acquisition Process for up to 800 Megawatts of Firm Dispatchable Generation*, Xcel Energy, Petition, September 26, 2025, Docket No. E002/M-23-212, (eDockets) [20259-223366-02](#) at 4-5. For Xcel’s self-build projects see: *In the Matter of Xcel Energy’s Competitive Resource Acquisition Process for up to 800 Megawatts of Firm Dispatchable Generation, Order Approving Settlement Agreement With Modifications*, April 21, 2025, Docket Nos. E002/RP-24-67 and E002/CN-23-212, (eDockets) [20254-217941-01](#) at 6-7. Specifically, the projects are: Combined Cycle—Onward’s Mankato Energy Center; Combustion Turbine—Invenergy’s Cannon Falls and Xcel’s Lyon County; BESS—Onward’s Mankato, DESRI’s North Star, and Xcel’s Sherco West.

<sup>7</sup> *In the Matter of Xcel Energy’s Competitive Resource Acquisition Process for up to 800 Megawatts of Firm Dispatchable Generation*, Xcel Energy, Supplement, December 5, 2025, Docket No. E002/CN-23-212 and E002/RP-24-67, (eDockets) [202512-225594-02](#), at 2. This is Panamint’s Cottage Grove BESS project.

<sup>8</sup> *In the Matter of Xcel Energy’s 2024 Wind, Solar, and Storage Request for Proposals*, Xcel Energy, Petition, October 31, 2025, Docket No. E002/M-24-230, (eDockets) [202510-224560-01](#), [202510-224560-03](#), [202510-224560-04](#), [202510-224560-05](#), [202510-224560-06](#), [202510-224560-07](#), [202510-224560-08](#), at 3. Specifically, the projects are: BESS—NextEra’s Crowned Ridge and Mayhew Lake, Tenaska’s Crane, and Xcel’s Blue Lake; Xcel’s 300 MW Sherco South BESS is moved to ERAS Portfolio 2; Solar—Geronimo Power’s Fillmore and Grant, One Energy’s Distributed Portfolio 1 and Distributed Portfolio 2, Ranger Power’s Gopher State and Lemon Hill, and Xcel’s Sherco Solar 4.

<sup>9</sup> *In the Matter of Northern States Power Company d/b/a Xcel Energy’s Petition for Approval of Generator Projects for MISO’s Expedited Resource Addition Study (ERAS)*, Xcel Energy, Petition, December 3, 2025, Docket No. E002/RP-24-67, (eDockets) [202512-225511-02](#). Specifically, the projects are: Combustion Turbine—Invenergy’s Cannon Falls Expansion; BESS—NextEra’s Benton II and Tenaska’s Sandhill. Note that for the combustion turbine Xcel provides a range of 45-70 MW.

<sup>10</sup> Petition at 9-10. The projects are BESS: Xcel’s Nobles and Sherco South.

<sup>11</sup> *In the Matter of Xcel’s Proposed Generator Projects For Expedited Resource Addition Study*, Xcel, Petition Supplement, August 1, 2025, Docket No. E002/RP-24-67 (eDockets) [20258-221673-01](#). Specifically, these are Xcel’s Little Rock wind/BESS and third party projects Redwood BESS and Lake Charlotte BESS.

<sup>12</sup> *In the Matter of Xcel Energy’s Petition for Approval of a Development Transfer Resource Acquisition Process*, Xcel Energy, Update, July 15, 2025, Docket No. E002/M-23-342, (eDockets) [20257-220987-01](#). Note that a subsequent update (October 15, 2025) omitted the capacity estimate.

In the Petition Xcel requests that the Commission take the following actions:

- Find that the Company’s proposed ERAS Portfolio 2 is in the public interest;
- Approve the acquisition and construction of the Company’s proposed ERAS Portfolio 2 and the Company’s proposed approach of recovery for these projects costs for the Minnesota jurisdiction through the Renewable Energy Standard (RES) Rider; and
- Establish a procedural schedule such that the Commission may complete deliberations by mid-May 2026, ahead of a substantial non-refundable payment required upon execution of the Generator Interconnection Agreement (GIA).<sup>13</sup>

## II. PROCEDURAL BACKGROUND

February 20, 2026                      Xcel filed a petition for approval of two self-build projects currently in MISO’s ERAS process.<sup>14</sup>

February 24, 2026                      The Commission issued a notice of comment period for the Petition.<sup>15</sup>

According to the Commission’s Notice the following topics are open for comment:

- Should the Commission approve the acquisition and construction of the Company’s proposed ERAS 2 project portfolio?
- Should the Commission approve Xcel’s proposed cost recovery approach for the Minnesota jurisdiction through the Renewable Energy Standard (RES) Rider?
- Are there other issues or concerns related to this matter?

## III. DEPARTMENT ANALYSIS

### A. COMPLETENESS

The Petition is a “miscellaneous filing” under Minn. R. 7829.0100, subp. 11 since no determination of Xcel’s overall revenue requirement is necessary.<sup>16</sup> Minn. R. 7829.1300 subp. 3 contains the

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<sup>13</sup> Petition at 18.

<sup>14</sup> Petition.

<sup>15</sup> *In the Matter of Northern States Power Company d/b/a Xcel Energy’s Petition for Approval of Generator Projects for MISO’s Expedited Resource Addition Study (ERAS), Notice of Comment Period*, February 24, 2026, Docket No. E002/RP-24-67, (eDockets) [20262-228554-01](#), (hereinafter “Notice”).

<sup>16</sup> [Minn. R. 7829.0100, subp. 11](#).

completeness requirements for miscellaneous filings.<sup>17</sup> The Petition was also filed pursuant to Minn. Stat. § 216B.1645, which contains additional completeness requirements.<sup>18</sup>

The Department reviewed the Petition for compliance with completeness requirements of statutes and rules. Based upon that review the Department concludes that the Petition is complete.

*B. GOVERNING STATUTES AND RULES*

*B.1. Overview*

The Petition was filed pursuant to Minn. Stat. § 216B.1645, requesting the Commission authorize recovery of self-build project costs through the RES Rider.<sup>19</sup> Xcel specifically points to Minn. Stat. § 216B.1645, subd. 2a(a)(3), which states:

The commission may approve, or approve as modified, a rate schedule that:

[...]

(3) allows recovery of other expenses incurred that are directly related to a renewable energy project, including expenses for energy storage, provided that the utility demonstrates to the commission's satisfaction that the expenses improve project economics, ensure project implementation, advance research and understanding of how storage devices may improve renewable energy projects, or facilitate coordination with the development of transmission necessary to transport energy produced by the project to market;<sup>20</sup>

This provision creates a two-step inquiry for determining whether expenses are eligible for cost recovery using the statutory provision. First, there must be a general demonstration that the expenses incurred “are directly related to a renewable energy project.” Second, the utility must further establish that the expenses more specifically relate to one of the four enumerated objectives:

- improve project economics;
- ensure project implementation;
- advance research and understanding of how storage devices may improve renewable energy projects; or
- facilitate coordination with the development of transmission necessary to transport energy produced by the project to market.

Note that the Commission verbally ruled on interpretation of this statute in Docket No. E002/M-24-230 in a request regarding Xcel’s Blue Lake BESS project; the written order is forthcoming.

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<sup>17</sup> [Minn. R. 7829.1300, subp. 3.](#)

<sup>18</sup> [Minn. Stat. § 216B.1645, subd 2a.](#)

<sup>19</sup> [Minn. Stat. § 216B.1645 subd. 2a.](#)

<sup>20</sup> [Minn. Stat. § 216B.1645 subd. 2a.](#)

*B.2. Recovery of Nobles BESS*

The Petition states that the Nobles BESS project “is being developed by Xcel Energy on approximately 25 acres of existing Company-owned property at the Nobles Wind Farm in Nobles County, Minnesota.” Therefore, the Department concludes that the Nobles BESS will “provide storage facilities for renewable energy generation facilities.” Second, from its accredited capacity, competitive pricing, storage of energy from the Nobles Wind Farm that might otherwise be curtailed, and the related reliability benefits, the Department concludes that the proposed Nobles BESS project will “improve project economics” and “facilitate coordination with the development of transmission necessary to transport energy produced by the project to market” as required by Minn. Stat. § 216B.1645. Therefore, the Nobles BESS project qualifies for rate recovery pursuant to Minn. Stat. § 216B.1645.

The Department recommends that the Commission determine that the Minnesota jurisdictional share of the costs of the Nobles BESS project qualify for recovery via Xcel’s RES Rider.

*B.3. Recovery of Sherco South BESS*

For the same reasons as given for the Nobles BESS above, the Department’s December 5, 2025 comments in Docket No. E002/M-24-230 concluded that the Sherco South BESS project qualifies for rate recovery pursuant to Minn. Stat. § 216B.1645.<sup>21</sup> Nothing in the project has changed relative to the requirements. Therefore, the Department continues to recommend that the Commission determine the Minnesota jurisdictional share of the costs of the Sherco South BESS project qualify for recovery via Xcel’s RES Rider.

*C. ADDED INTERCONNECTION COSTS*

Table 3 shows the capacity studied and the resulting costs from the published studies for the most recently completed DPP groups in the West Study Area. Note that DPP1 results starting with DPP-17-AUG are not comparable to the data for prior DPP groups due to changes in what is studied in DPP1.<sup>22</sup>

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<sup>21</sup> *In the Matter of Northern States Power Company’s, d/b/a Xcel Energy, Petition for Approval of Solar and Storage Portfolio*, Department, Comments, December 5, 2025, Docket No. E002/M-24-230, (eDockets) [202512-225595-02](#) at 24.

<sup>22</sup> The changes are part of MISO’s efforts to speed up the DPP studies.

**Table 3: MISO West Group Results**  
*Projects Requesting Network Resource Interconnection Service (NRIS)*

Study Group	NRIS MW			Average \$ ,000 per NRIS MW			Maximum \$ ,000 per NRIS MW		
	DPP 1	DPP 2	DPP 3	DPP 1	DPP 2	DPP 3	DPP 1	DPP 2	DPP 3
DPP-16-FEB	5,387	4,567	3,302	\$ 475	\$ 135	\$ 60	\$1,164	\$ 240	\$ 159
DPP-16-AUG	5,618	2,400	2,302	\$ 639	\$ 141	\$ 93	\$1,923	\$ 461	\$ 134
DPP-17-FEB	3,421	1,394	245	\$ 969	\$ 1,966	\$ 970	\$2,089	\$ 4,265	\$ 1,211
DPP-17-AUG	4,819	3,594	600	\$ 181	\$ 679	\$ 103	\$ 609	\$ 1,647	\$ 247
DPP-18-APR	8,023	4,240	953	\$ 134	\$ 225	\$ 64	\$ 606	\$ 2,676	\$ 226
DPP-19-Cycle 1	8,126	5,428	2,515	\$ 112	\$ 238	\$ 248	\$ 954	\$ 2,223	\$ 1,008
DPP-20-Cycle 1	5,433	3,035	2,178	\$ 213	\$ 263	\$ 113	\$1,228	\$ 877	\$ 722

Table 3 shows that the DPP-16-FEB group was largely successful in obtaining NRIS interconnection at a reasonable cost; 61 percent of the NRIS capacity studied in DPP1 was still in active for DPP3 and the maximum cost for a project turned out to be \$159,000 per MW. However, the second group, DPP-16-AUG, encountered significant transmission cost issues and was less successful; only 41 percent of the capacity studied in DPP1 was still in active for DPP3 but the maximum cost for a project was similar, about \$134,000 per MW. After that the groups DPP-17-FEB through DPP-19-Cycle 1 largely failed. Only 18 percent of the NRIS capacity studied in DPP1 was still active for DPP3 and the maximum cost for a project increased to \$1.2 million per MW. The final group in Table 3, DPP-20-Cycle 1 was more successful in that 40 percent of the capacity studied in DPP1 was still in active for DPP3 and the average cost for a project turned out to be \$113,000 per MW.

From the data in Table 3, it appears that the affordability upper limit for transmission costs is around \$250,000 per NRIS MW. Further, the West Study Area appears to be very short of affordable transmission interconnection capability. Xcel also estimates the value of new interconnection rights at \$250,000 per MW.<sup>23</sup>

Based upon the data in Table 3, the Department concludes that the estimated cost increase due to the switch from Surplus Interconnection to ERAS Interconnection for the Sherco South BESS, which amounts to **[TRADE SECRET DATA HAS BEEN EXCISED]** is reasonable.

**D. NEED ANALYSIS**

The proposed Nobles and Sherco South BESS projects do not qualify as large energy facilities under Minn. Stat. § 216B.2421,<sup>24</sup> because they are not electric power generating plants. Therefore, a certificate of need will not be required. The need analysis here is based upon Xcel’s EnCompass modeling as presented in the Petition.

<sup>23</sup> Petition at 10.

<sup>24</sup> [Minn. Stat. § 216B.2421](#) (2025).

### D.1. Background

The Commission's Order in Xcel's most recent IRP set peaking capacity acquisition targets as follows:

- 600 MW of standalone BESS to be installed by a target date of end-of-year 2030;
  - to the extent feasible, 120 MW must use the MNEC; and
- aside from the resources selected in the firm dispatchable docket (Docket No. E002/CN-23-212), the five-year action plan does not include any size/type/timing decisions for new generic resources that could include combustion turbine gas plants, nor does it include any additional new gas generation with unconstrained carbon emissions.<sup>25</sup>

The 600 MW of standalone BESS target was addressed by Xcel's petition in Docket No. E002/M-24-230 which proposed the acquisition of 856 MW/3,422 MWh of BESS capacity.<sup>26</sup> Note that 300 MW of that BESS capacity (Sherco South) was moved to this proceeding.

The IRP process seeks to select a plan that balances the needs for maintaining reliability, minimizing rates, reducing adverse environmental and socioeconomic burdens, enhancing the utility's ability to respond to changes, and limiting the impact of risks by analyzing various options under a variety of assumptions and considering stakeholder input.<sup>27</sup> The projects in question here were not selected in the IRP process. However, the resource size, type, and timing targets for Xcel's additions were determined in the IRP.

Overall, a well-developed IRP provides the analytical basis for determinations in subsequent proceedings. When a utility's proposed resource acquisition is consistent with the IRP analysis and Commission decision, no further resource-planning type analysis is needed.<sup>28</sup> When facts regarding the specific resources proposed by the utility fall outside of the analysis and Commission decision in the most recent IRP, further resource-planning type analysis using the updated facts is warranted. In essence, resource acquisition typically conforms with the Commission's most recent IRP order unless facts in the resource acquisition proceeding dictate that the action plan should change.<sup>29</sup> This approach is consistent with the Commission's order in a past resource acquisition proceeding:

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<sup>25</sup> *In the Matter of Xcel Energy's 2024–2040 Upper Midwest Integrated Resource Plan, Order Approving Settlement Agreement with Modifications*, April 21, 2025, Docket Nos. E002/RP-24-67 and E002/CN-23-212 (eDockets) [20254-217941-01](#) at Order Points 2, 3, 4, and 7.

<sup>26</sup> 2024 RFP Petition at 1.

<sup>27</sup> [Minn. R. 7843.0500](#).

<sup>28</sup> Examples include Docket Nos. IP6838/CN-10-80 and E002/M-11-713 (Prairie Rose Wind); Docket No. E015/M-13-907 (Bison 4); and Docket Nos. E017/M-09-883 and E017/M-09-1484.

<sup>29</sup> An example is Xcel's acquisition of 750 MW of wind generation in Dockets E002/M-13-603 and E002/M-13-716. In that case Xcel's 2010 IRP called for the addition of 200 MW of wind. However, Xcel subsequently found the cost of wind generation was below the cost evaluated in the IRP. Additional analysis with updated costs was performed by Xcel and the DOC found that, using updated pricing additional wind was cost effective.

[...] while a resource plan is intended to plot a utility's course for the next 15 years, it is based on facts known as of a specific point in time. As more facts become known, circumstances change and utilities must adapt – even in the absence of a new resource plan order.<sup>30</sup>

Given the significant change in numerous inputs such as the demand and energy forecast and new unit pricing, adaptation is clearly warranted. In this case Xcel relied upon a recently completed mini-IRP as described below.

## D.2. Xcel's EnCompass Update

### D.2.1. Model Updates and Process

Xcel started the Company's EnCompass analysis by using the updated base case used for the ERAS 1 petition.<sup>31</sup> The Petition specifies the following changes in EnCompass to develop an updated Base Case.

- Resource Updates Related to Capacity Needs:
  - EnCompass includes the projects in the 800 MW Petition—Lyon County CT, Cannon Falls PPA extension, Mankato Energy Center 1 PPA extension with BESS, North Star BESS, and Sherco West BESS;
  - EnCompass includes the projects in the 2024 RFP Petition—Sherco Solar 4, Fillmore Solar, Gopher Solar, Grant Solar, Lemon Hill Solar, Blue Lake BESS, Sherco South BESS, Crane BESS, Crowned Ridge BESS, and Mayhew Lake BESS; and
  - no additional generic CT additions were available before 2030.<sup>32</sup>
- Spot Market Status Between 2027 and 2029:
  - EnCompass allows purchases of spot market capacity at MISO's CONE; and
  - EnCompass allows purchases of spot market energy at forecasted prices.<sup>33</sup>
- Spot Market Status Beginning 2030:
  - EnCompass no longer allows spot market purchases of capacity or energy. All requirements must be met through owned or contracted resources.<sup>34</sup>

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<sup>30</sup> *In the Matter of the Petition of Xcel Energy for Approval of the Acquisition of 600 MW of Wind Generation, Order Approving Acquisitions with Conditions*, December 13, 2013, Docket No. E002/M-13-603, (eDockets) [201312-94604-02](#), at 9.

<sup>31</sup> *In the Matter of Northern States Power Company's, d/b/a Xcel Energy, Petition for Approval of Generator Projects for MISO's Expedited Resource Addition Study*, Xcel, Petition, December 3, 2025, Docket No. E002/RP-24-67 (eDockets) [202512-225511-02](#) at 21-24.

<sup>32</sup> Petition at 13-14. Note that the Petition states that the Cannon Falls expansion, Benton BESS, and Sandhill BESS projects are in the model but this is not the case for the scenario labeled "2024 RFP Portfolio - 2025v2 Load – PVRR" which is the basis for the capacity need analysis per the Company's response to Department Information Request No. 50, Attachment A.

<sup>33</sup> Petition at 14.

<sup>34</sup> This appears to apply to the expansion plan run but not the subsequent production cost (PVRR and PVSC) runs. Petition at 14.

- Remaining Additions:
  - EnCompass has 3,500 MW of generic resources (wind, solar) and 400 MW of generic solar at King in 2030 locked in.<sup>35</sup>
- Load Forecast:
  - EnCompass uses the latest (2025v2) load forecast.
- PTC Assumptions:
  - PTCs are assumed for generic resources through 2030 and no PTCs beyond 2030.

EnCompass then was run to determine a capacity expansion plan for the base case.

Changes to the base case for the ERAS 2 Portfolio Case include Xcel forcing into the model the Nobles BESS project and replacing the Sherco South BESS project costs from the 2024 RFP portfolio with costs that reflect the ERAS 2 data.

Both the Base Case and the ERAS 2 Portfolio Case were run as an expansion plan, the resulting expansion units locked-in, and then re-run as production cost runs (for both PVRR and PVSC) covering all 8,760 hours in a year. The PVRR and PVSC results are reported in the Petition.

#### *D.2.2. Xcel's Results for ERAS Portfolio 2*

For the Study Period (2024-2050) Xcel's results show the ERAS 2 Portfolio Case increases PVRR by \$107 million and increases PVSC by \$105 million.<sup>36</sup>

Other results are:

- changes in cumulative CO<sub>2</sub> emissions for the ERAS 2 Portfolio Case are an increase of 69,000 tons for the Study Period under PVSC inputs but a decrease of 258,000 tons under PVRR inputs;<sup>37</sup>
- compliance with the CFS under Minn. Stat. § 216B.1691, subd. 2g throughout the Study Period in either case.<sup>38</sup>

#### *D.3. Analysis of EnCompass Results*

##### *D.3.1. Matching Xcel's EnCompass Results*

In response to Department Information Request No. 45, the Department received the inputs, outputs, and post-processing files generated by Xcel in the Company's EnCompass modeling. This data is verified in a process referred to as "matching," and ensures the modeling runs can be replicated and

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<sup>35</sup> Petition at 14.

<sup>36</sup> Petition at 15.

<sup>37</sup> Taken from Xcel's post processing spreadsheet (Filename: EO - FINAL - ERAS PF2 Extension - PVSC-PVRR 2-18-26 TRADE SECRET IN ENTIRETY.xlsx) provided in response to Department Information Request No. 45.

<sup>38</sup> *Ibid.*

that the inputs and outputs match. The primary purpose of this step is to ensure that the Department is using the same input data as Xcel.

Second, the Department currently has multiple dockets in process with utilities using different EnCompass versions. The Department's EnCompass machines are being shared across multiple dockets; to avoid potential errors in other proceedings due to different EnCompass versions on various machines, the Department opted to run EnCompass without changing the version currently installed. That choice meant using a different EnCompass version than Xcel. Using a different EnCompass version means that the Department can get different results even if it is using the exact same inputs, making the matching process less accurate.

Xcel's EnCompass results in the Petition come from four scenarios—two production cost runs using PVRR inputs (with and without the ERAS Portfolio 2) and two production cost runs using PVSC inputs (again, with and without the ERAS Portfolio 2).<sup>39</sup> Despite the different versions the Department was able to match Xcel's results for all four cases.

#### *D.3.2. Analysis of Need*

The Department calculated the Company's peaking capacity needs from the mini-IRP that have not yet been acquired. Peaking needs appear in EnCompass via generic BESS and CT units. The Department's comments on Xcel's most recent IRP stated in regards to lumping both technologies into a common category:

It is unclear why Xcel's model prefers to add batteries and the Department's prefers to add CTs. In any event, both CTs and batteries are peaking technologies and the exact choice is best deferred to a resource acquisition proceeding which can weigh the costs and benefits of actual projects in a more detailed manner.<sup>40</sup>

Table 4 below shows a comparison of Xcel's peaking needs to recently acquired peaking resources. Table 4 shows that, counting the ERAS Portfolio 2, Xcel has acquired capacity approximately equal to the model's results for the action plan period (through 2030). Note that EnCompass adds 600 MW of Generic BESS resources in 2031 and 374 MW of Generic CT resources in 2032 and 2033. Therefore, Xcel has substantial needs for additional peaking capacity in the years immediately after 2030.

Based upon the information in Table 4, the Department concludes that Xcel has demonstrated a need for the additional peaking capacity represented by the ERAS Portfolio 2 projects.

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<sup>39</sup> The production cost runs are done after a capacity expansion run. But the results of capacity expansion runs generally are not discussed in Xcel's Petition. This multi-step process is generally the same as what Xcel used in the most recent IRP and other recent dockets.

<sup>40</sup> *In the Matter of Xcel Energy's 2024–2040 Upper Midwest Integrated Resource Plan*, Department, Comments, August 9, 2024, Docket No. E002/RP-24-67, (eDockets) [20248-209394-02](#) at 42.

**Table 4: Capacity Needs<sup>41</sup>**

Item	Category	Capacity	Category Capacity
Generic BESS	2028-'30 Need	60	
Generic CT	2028-'30 Need	748	
<b>Subtotal</b>	<b>2028-'30 Need</b>		808
Cottage Grove BESS	23-212 Replacement	80	
Cannon Falls CT	ERAS Portfolio 1	45	
Sandhill BESS	ERAS Portfolio 1	200	
Benton II BESS	ERAS Portfolio 1	300	
Nobles BESS	ERAS Portfolio 2	300	
<b>Subtotal</b>	<b>Acquisitions</b>		925
<b>Difference</b>	<b>Need - Acquisitions</b>		(117)

*D.3.3. Benefits and Costs*

The Petition’s Table 5 shows that the ERAS Portfolio 2 increases both PVRR and PVSC. However, what the Petition’s Table 5 compares is Xcel’s existing resources, plus a set of generic resources, to Xcel’s existing resources, plus the ERAS Portfolio 2, and supplemented by additional generic resources. In other words, the Petition’s Table 5 compares the ERAS Portfolio 2 to generic resources. Such a comparison is unlikely to be valid due to substantial increases—above the model’s cost of generic units—in the cost of new projects.

Second, in the scenarios with and without the ERAS Portfolio 2 projects, Xcel has capacity in excess of the reserve margin and in nearly every year sells the maximum allowed (500 MW) into the capacity market. This means the ERAS Portfolio 2 projects are not receiving any benefit from the capacity market; Xcel hits the maximum sales allowed even without the ERAS Portfolio 2 projects. This approach is reasonable because it prevents the model from adding capacity resources merely to speculate on future capacity market pricing.

Third, the Department reviewed the difference between the two PVSC scenarios in total accredited capacity by EnCompass resource type. The result was that only two resource types showed a difference. The firm capacity for BESS showed an overall increase and the accredited capacity for CT showed an overall decrease with the exception of 2 years. This is shown in Table 5 below for the key years.

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<sup>41</sup> All data taken from the Company’s reply to Department Information Request No. 50. Note that, as mentioned above, the Sherco South BESS is included in the model as an acquired resource via the 2024 RFP.

**Table 5: ERAS Portfolio 2 minus Base Case Expansion Plan<sup>42</sup>  
 (Accredited MW)**

Year	CT	BESS
2028	0	261
2029	0	256
2030	0	251
2031	114	246
2032	114	251
2033	(86)	257
2034	(86)	262
2035	(86)	268
2036	(86)	273
2037	(86)	278
2038	(86)	284
2039	(86)	289
2040	(86)	295
2041	(200)	300
2042	(200)	300

EnCompass will show some benefits from the avoided CT capacity but the amount avoided capacity shown in Table 5, on its own, does not justify the addition of the ERAS Portfolio 2 projects.<sup>43</sup>

Fourth, the Department calculated the difference between the two scenarios in energy output by EnCompass resource type along with the sinks for the energy. The results from the PVSC production cost run are summarized in Chart 1 below. Chart 1 shows both sources (resource types generating more energy in the ERAS Portfolio 2 case) and sinks (resource types generating less energy or demand increases in the ERAS Portfolio 2 case).<sup>44</sup> Only resource types with a difference of at least  $\pm 500$  GWh over the study period are shown in Chart 1.

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<sup>42</sup> These results are derived from EnCompass' annual outputs and will reflect summer, the season with the highest need for accredited capacity. The negative number means less accredited capacity was added in the Portfolio 2 case than the base case.

<sup>43</sup> In fact, all of the changes in internal costs will not justify the addition of the ERAS Portfolio 2 projects since the ERAS Portfolio 2 projects fail a PVR test.

<sup>44</sup> Note that storage does not generate electricity but does consume electricity due to losses in storage and thus would show up as a sink in the chart because more energy is required to charge the BESS units than is received from their discharge. Increased sales is also a sink (negative) because the increased sales are a destination for the increased energy output.

**Chart 1: Energy Impact by Resource Type  
(ERAS Portfolio 2 vs. Base Case, Total GWh, from PVSC runs)**

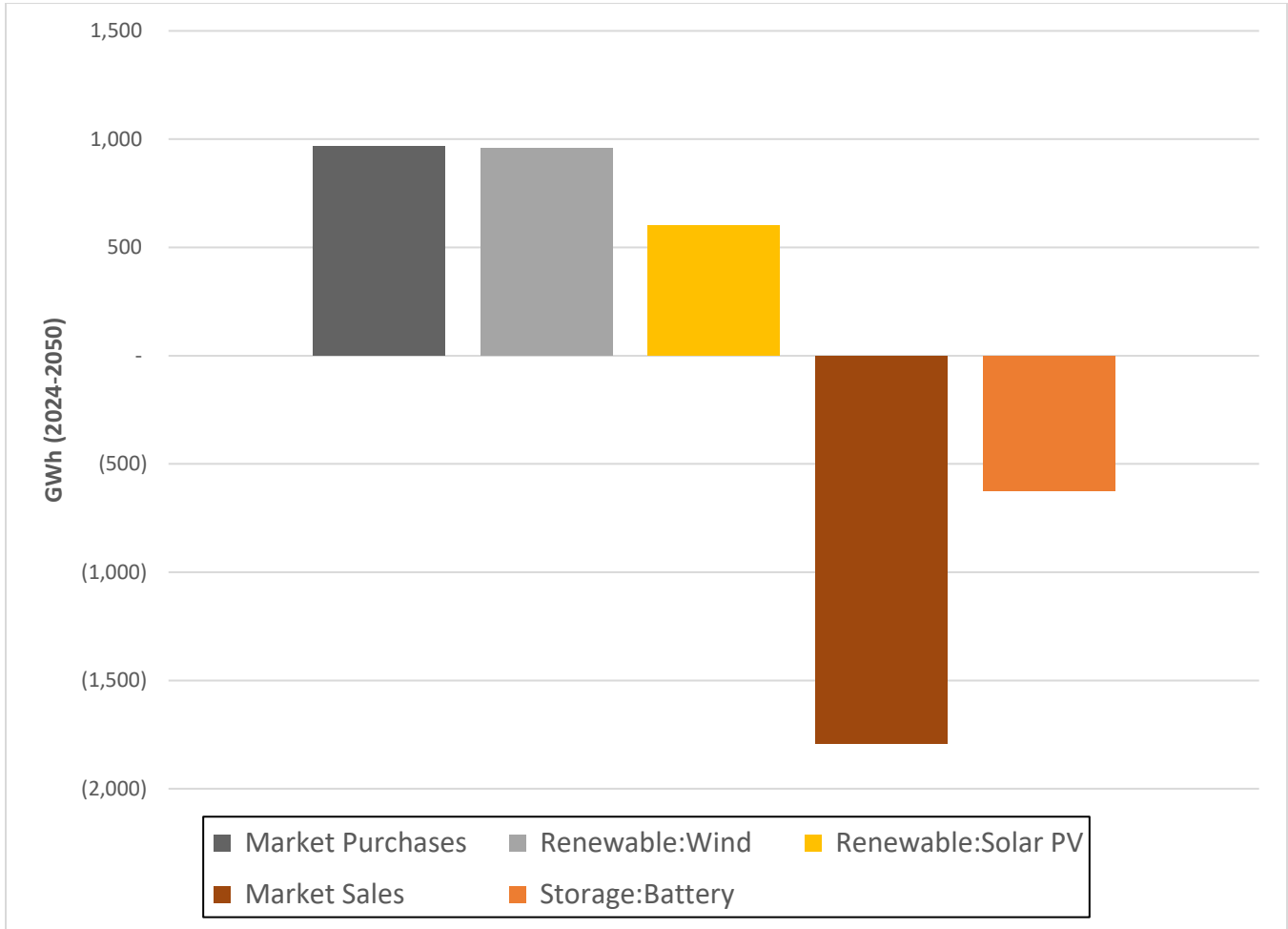


Chart 1 shows that the ERAS Portfolio 2 case:

- Sources:
  - Increase in energy output from Xcel’s wind and solar units;
  - increase in Xcel’s spot energy market purchases;
- Sinks:
  - Increase in Xcel’s spot energy market sales;<sup>45</sup> and
  - increase in energy lost in charging.

The increased energy from wind and solar, despite virtually no change in renewable capacity, means that EnCompass is using the extra BESS capacity to reduce wind and solar curtailments. However, it is important to understand limitations in how EnCompass determines curtailment.

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<sup>45</sup> This is shown as a negative since increased sales represent a sink for new energy output.

EnCompass, as structured by Xcel and other utilities, generally does not have system topology—a complex system of transmission to connect various generators and loads. Instead, nearly all of the generating units and load on Xcel’s system are connected to each other with an assumed loss factor to move energy from generators to load.<sup>46</sup> There are no “locational” differences. This simplification speeds up the resource plan analysis with, in most instances, little cost in terms of missing information in the model. However, when specific units are being analyzed instead of generic units the simplification can present problems.

The simplification in model inputs (lack of topology) means that curtailment in EnCompass does not occur due to local circumstances, as is the case for some generators on the Buffalo Ridge, for example. Instead, curtailment occurs when, in any one hour, total load plus the size of the connection to the energy spot market is less than the must run generation. For example, if total load is 100 MW and the size of the connection to the energy spot market is 50 MW but must run generation is 200 MW, then EnCompass will report 50 MW of curtailment that hour (200 MW less 150 MW). Due to this difference in system topology (generic EnCompass inputs from an IRP analyzing ERAS Portfolio 2 projects with a specific location) it cannot be known if the reduction in curtailment calculated by EnCompass for ERAS Portfolio 2 will actually be realized or even are a reasonable, ballpark estimate.

Also, in EnCompass Xcel is a net seller in the energy spot market by a significant margin (typically 2,000 to 5,000 GWh annually). By increasing purchases and reducing sales, the ERAS Portfolio 2 case is reducing Xcel’s overall sell-side energy market risk.

Table 5 shows that Xcel has acquired approximately the amount of peaking capacity EnCompass added. However, the same EnCompass scenario has Xcel acquiring 3,600 MW of wind resources and 2,100 MW of solar resources by the end of 2030. The large quantity of resource additions that the modeling shows are needed in the near future adds substantial risk to Xcel’s position in that such large quantities of capacity may not be available at a reasonable price.<sup>47</sup> The projects proposed in ERAS Portfolio 2 can mitigate this risk. Overall, this data indicates that the question at hand is not whether the ERAS Portfolio 2 projects are needed; the question is whether better projects could be found in a timely manner in a formal RFP. Given the timing of the need and current events that would appear to be unlikely.

#### *D.3.4. Conclusion*

Overall Xcel has shown that the Company has substantial need for peaking resources via the EnCompass “mini-IRP.” Second, the Company is switching from EnCompass’ preference for CT units to the BESS units proposed in ERAS Portfolio 2. Third, while EnCompass is reporting a net cost for adding the ERAS Portfolio 2, it is not clear that a cost comparison of actual projects to generic units is helpful.

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<sup>46</sup> There are a handful of exceptions where a group of generating units are modeled as a separate ‘system’ with a single transmission connection to Xcel’s main system. This is done to reflect unique circumstances, such as multiple generators using the same interconnection capacity.

<sup>47</sup> For example, see *In the Matter of Xcel Energy’s Distributed Solar Energy Standards Status Update*, Xcel Energy, Status Report, December 30, 2025, Docket No. E002/M-25-441 (eDockets) [202512-226328-01](#).

#### E. XCEL'S ACQUISITION PROCESS

The Sherco South BESS is a project that was originally selected through Xcel's Commission-approved bidding process; in this case Xcel's 2024 RFP. However, the Nobles BESS project was not selected via Xcel's Commission-approved bidding process. The Commission's most recent order regarding competitive bidding only required Xcel to use a formal bidding process for resources in the approved in the Five-Year Action Plan.<sup>48</sup> Instead of using the formal process Xcel compared the pricing of the BESS projects here to the pricing obtained in the 2024 RFP.

The Department concludes that the 2024 IRP Order does not require a separate RFP for the project in question because the ERAS Portfolio 2 provides capacity in excess of the requirements in the Five-Year Action Plan. While it would be preferrable for the Nobles BESS project to have been selected via a competitive process, that is not required. Thus, the Department concludes that reference to projects in a recently completed RFP as evidence of current market pricing is reasonable in this instance.

#### F. ECONOMIC DEVELOPMENT

Minn. Stat. § 216B.1691, subd. 9 (a) describes reasonable actions the Commission must take to maximize net benefits to all Minnesota citizens.<sup>49</sup>

- (1) the creation of high-quality jobs in Minnesota paying wages that support families;
- (2) recognition of the rights of workers to organize and unionize;
- (3) ensuring that workers have the necessary tools, opportunities, and economic assistance to adapt successfully during the energy transition, particularly in environmental justice areas;
- (4) ensuring that all Minnesotans share (i) the benefits of clean and renewable energy, and (ii) the opportunity to participate fully in the clean energy economy;
- (5) ensuring that statewide air emissions are reduced, particularly in environmental justice areas; and
- (6) the provision of affordable electric service to Minnesotans, particularly to low-income consumers.

In the 2024 IRP Order, the Commission required Xcel to "work with parties representing organized labor to maximize socioeconomic benefits to customers and host communities by prioritizing creation of high-quality jobs and apprenticeship pathways for local workers in the implementation of projects and programs included in the resource plan."<sup>50</sup> In addition, the Commission required Xcel to "work with the Environmental Justice Advisory Board to better understand how to prioritize and incentivize investments and economic benefits for underserved communities."<sup>51</sup>

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<sup>48</sup> *In the Matter of Xcel Energy's 2024–2040 Upper Midwest Integrated Resource Plan, Order Approving Settlement Agreement with Modifications*, April 21, 2025, Docket No. E002/RP-24-67, (eDockets) [20254-217941-01](#), at Order Point 9 (hereinafter "2024 IRP Order").

<sup>49</sup> [Minn. Stat. § 216B.1691, subd. 9 \(a\)](#) (2025).

<sup>50</sup> 2024 IRP Order at Order Point 26.

<sup>51</sup> *Id.*, at Order Point 27.

The Petition indicates that the Company intends to utilize union labor for the construction of the proposed projects.<sup>52</sup> Thus, the proposed projects are consistent with the criteria listed above.

Overall, the Department concludes that the Projects meet the requirements for economic development as described in Minn. Stat. § 216B.1691, subd. 9 (a) and the 2024 IRP Order.

#### *G. TAX MATTERS*

Regarding the proposed projects, Xcel expects the following tax credits:

- Sherco South BESS—standard 30 percent ITC value and an additional 10 percent bonus for being located in an energy community; and
- Nobles BESS—standard 30 percent ITC value.<sup>53</sup>

These estimates are dependent upon Xcel’s current interpretation of IRS guidance and the estimates are before transfer cost assumptions for the sale of the ITC. The Department has no concerns regarding Xcel’s tax credit assumptions.

#### *H. COST CAP*

Based upon the Commission’s decision in Docket No. E002/M-24-230<sup>54</sup> the Department recommends the Commission limit cost recovery for the projects in Xcel’s proposed ERAS Portfolio 2 to a soft cost cap set at the cost reported by Xcel in the Petition. Also, the Department recommends the Commission authorize Xcel to request Commission approval to exceed the cost cap if the Company proves that any costs incurred above the cap were necessary and prudent and outside the Company’s control.

#### *I. COMMISSION NOTICE*

##### *I.1. Approve the Portfolio?*

The first issue listed in the Notice is: “[s]hould the Commission approve the acquisition and construction of the Company’s proposed ERAS 2 project portfolio?”

Considering the risks related to curtailment benefits, avoided CT capacity, and Xcel’s overall position in MISO’s capacity and energy markets, the Department concludes that benefits outweigh the costs. Therefore, the Department recommends the Commission approve the acquisition and construction of the Company’s proposed ERAS 2 Portfolio.

##### *I.2. Authorize RES Rider Recovery?*

The second issue listed in the Notice is: “[s]hould the Commission approve Xcel’s proposed cost recovery approach for the Minnesota jurisdiction through the Renewable Energy Standard (RES) Rider?”

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<sup>52</sup> Petition at 3.

<sup>53</sup> Xcel’s Response to Department Information Request Nos. 47 and 48.

<sup>54</sup> The written order is forthcoming at this time.

As noted above, the Department recommends the Commission approve RES Rider recovery for the Minnesota jurisdictional share of the proposed ERAS 2 Portfolio projects' costs.

*1.3. Other Issues?*

The third issue listed in the Notice is: “[a]re there other issues or concerns related to this matter?”

The Department has no other issues at this time.

**IV. DEPARTMENT RECOMMENDATIONS**

Based on analysis of the information in the record, the Department has prepared recommendations, which are provided below. The recommendations correspond to the subheadings of Section III above.

*B. GOVERNING STATUTES AND RULES*

- B.2. The Department recommends that the Commission determine that the Minnesota jurisdictional share of the costs of the Nobles BESS project qualify for recovery via Xcel's RES Rider.
- B.3. The Department recommends that the Commission determine that the Minnesota jurisdictional share of the costs of the Sherco South BESS project qualify for recovery via Xcel's RES Rider.

*H. COST CAP*

- The Department recommends the Commission limit cost recovery for the projects in Xcel's proposed ERAS Portfolio 2 to a soft cost cap set at the cost reported by Xcel in the Petition.
- The Department recommends the Commission authorize Xcel to request Commission approval to exceed the cost cap if the Company proves that any costs incurred above the cap were necessary and prudent and outside the Company's control.

*I. COMMISSION NOTICE*

- I.1. The Department recommends the Commission approve the acquisition and construction of the Company's proposed ERAS 2 Portfolio.
- I.2. The Department recommends the Commission approve RES Rider recovery for the Minnesota jurisdictional portion of the proposed ERAS 2 Portfolio projects' costs

## Attachments

## **CERTIFICATE OF SERVICE**

I, Sharon Ferguson, hereby certify that I have this day, served copies of the following document on the attached list of people by electronic filing, certified mail, e-mail, or by depositing a true and correct copy thereof properly enveloped with postage paid in the United States Mail at St. Paul, Minnesota.

**Minnesota Department of Commerce  
Public Comments**

**Docket No. E002/RP-24-67**

Dated this **19<sup>th</sup>** day of **March 2026**

**/s/Sharon Ferguson**

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77	Mark	Kaminski	mark.kaminski@gsa.gov	General Services Administration		1800 F Street NW Washington DC, 20405 United States	Electronic Service		No	24-67
78	Veda	Kanitz	vmkanitz@gmail.com			null null, null United States	Electronic Service		No	24-67
79	Jenny	Kartes	jkartes@arrowhead.coop	Arrowhead Electric Cooperative, Inc.(P)		PO Box 39 5401 W Hwy 61 Lutsen MN, 55612 United States	Electronic Service		No	24-67
80	David	Kempf	dkempf@grenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	24-67

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
81	William	Kenworthy	will@votesolar.org			1 South Dearborn St Ste 2000 Chicago IL, 60603 United States	Electronic Service		No	24-67
82	Bobby	King	bking@solarunitedneighbors.org	Solar United Neighbors		3140 43rd Ave S Minneapolis MN, 55406 United States	Electronic Service		No	24-67
83	Therese	LaCanne	tlacanne@greenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	24-67
84	Matthew	Lacey	mlacey@greenergy.com	Great River Energy		12300 Elm Creek Boulevard Maple Grove MN, 55369-4718 United States	Electronic Service		No	24-67
85	Arthur	LaRose	arthur.larose@llojibwe.net	Leech Lake Band of Ojibwe		190 Sailstar Drive NW Cass Lake MN, 56633 United States	Electronic Service		No	24-67
86	Robert L	Larsen	robert.larsen@lowersioux.com	Lower Sioux Indian Community		PO Box 308 39527 Reservation Highway 1 Morton MN, 56270 United States	Electronic Service		No	24-67
87	Mark	Larson	mlarson@meeker.coop	Meeker Coop Light & Power Assn		1725 Highway 12 E Ste 100 Litchfield MN, 55355 United States	Electronic Service		No	24-67
88	Michelle	Larson	michelle@redwingchamber.com	Red Wing Area Chamber of Commerce		439 Main Street Red Wing, MN Bay Point Park MN, 55066 United States	Electronic Service		No	24-67
89	Dan	Leshner	dlesher@greenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	24-67
90	Michelle	Lommel	mlommel@greenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	24-67
91	Kavita	Maini	kmaini@wi.rr.com	KM Energy Consulting, LLC		961 N Lost Woods Rd Oconomowoc WI, 53066 United States	Electronic Service		No	24-67
92	Christine	Marquis	regulatory.records@xcelenergy.com	Xcel Energy		414 Nicollet Mall MN1180-07-MCA Minneapolis MN, 55401 United States	Electronic Service		No	24-67
93	Shena	Matrious	shena.matrious@millelacsband.com	Mille Lacs Band of Ojibwe		43408 Oodena Drive Onamia MN, 56349 United States	Electronic Service		No	24-67

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
94	April	McCormick	aprilm@grandportage.com	Grand Portage Band of Lake Superior Chippewa		PO Box 428 Grand Portage MN, 55605 United States	Electronic Service		No	24-67
95	Ronald	Meier	rmeier@mcleodcoop.com	Mcleod Cooperative Power		3515 11th St East Glencoe MN, 55336 United States	Electronic Service		No	24-67
96	Peder	Mewis	pmewis@cleangridalliance.org	Clean Grid Alliance		570 Asbury St. St. Paul MN, 55104 United States	Electronic Service		No	24-67
97	Valentina	Mgeni	valentina.mgeni@piic.org	Prairie Island Indian Community		Prairie Island Indian Community 5636 Sturgeon Lake Road Welch MN, 55089 United States	Electronic Service		No	24-67
98	Cole W.	Miller	cole.miller@shakopeedakota.org	Shakopee Mdewakanton Sioux Community		Shakopee Mdewakanton Sioux Community 2330 Sioux Trail NW Prior Lake MN, 55372 United States	Electronic Service		No	24-67
99	Sarah	Mooradian	sarah@curemn.org	CURE		117 South 1st Street Montevideo MN, 56265 United States	Electronic Service		No	24-67
100	Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP		33 South Sixth St Ste 4200 Minneapolis MN, 55402 United States	Electronic Service		No	24-67
101	Travis	Morrison	travis.morrison@boisforte-nsn.gov	Bois Forte Band of Chippewa		Bois Forte Tribal Government 5344 Lakeshore Drive Nett Lake MN, 55772 United States	Electronic Service		No	24-67
102	David	Morrison, Sr.	david.morrison@boisforte-nsn.gov	Bois Forte Band of Chippewa		Bois Forte Tribal Government 5344 Lakeshore Drive Nett Lake MN, 55772 United States	Electronic Service		No	24-67
103	Will	Mulhern	mulhern@fresh-energy.org	Fresh Energy			Electronic Service		No	24-67
104	Evan	Mulholland	emulholland@mncenter.org	Minnesota Center for Environmental Advocacy		1919 University Ave W Ste 515 Saint Paul MN, 55101 United States	Electronic Service		No	24-67
105	Sonny	Myers	smyers@1854treatyauthority.org	1854 Treaty Authority		4428 Haines Rd Duluth MN, 55811-1524 United States	Electronic Service		No	24-67

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
106	Pouya	Najmaie	najm0001@gmail.com	Cooperative Energy Futures		3416 16th Ave S Minneapolis MN, 55407 United States	Electronic Service		No	24-67
107	Carl	Nelson	cnelson@mncee.org	Center for Energy and Environment		212 3rd Ave N Ste 560 Minneapolis MN, 55401 United States	Electronic Service		No	24-67
108	Deb	Nelson	dnelson@greenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	24-67
109	David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency		220 South Sixth Street Suite 1300 Minneapolis MN, 55402 United States	Electronic Service		No	24-67
110	Duane	Ninneman	duane@cureriver.org	Clean Up the River Environment		117 South 1st St Montevideo MN, 56265 United States	Electronic Service		No	24-67
111	Logan	O'Grady	logrady@mnseia.org	Minnesota Solar Energy Industries Association		2288 University Ave W St. Paul MN, 55114 United States	Electronic Service		No	24-67
112	Joseph	OBrien	joey.obrien@lowersioux.com			39527 Highway 1 Morton MN, 56270 United States	Electronic Service		No	24-67
113	Carol A.	Overland	overland@legalelectric.org	Legalelectric - Overland Law Office		1110 West Avenue Red Wing MN, 55066 United States	Electronic Service		No	24-67
114	Gregory	Padden	gpadden@greenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	24-67
115	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		Yes	24-67
116	Marsha	Parlow	mparlow@greenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	24-67
117	Priti	Patel	ppatel@greenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369-4718 United States	Electronic Service		No	24-67
118	Earl	Pendleton	earl.pendleton@lowersioux.com	Lower Sioux Indian Community		39527 Highway 1 Morton MN, 56270 United States	Electronic Service		No	24-67
119	Gordon	Pietsch	gpietsch@greenergy.com	Great River Energy		12300 Elm Creek Blvd. Maple Grove MN, 55369-	Electronic Service		No	24-67

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						4718 United States				
120	Joe	Plumer	joe.plumer@redlakenation.org	Red Lake Nation		15484 Migizi Drive Red Lake MN, 56671 United States	Electronic Service		No	24-67
121	Kevin	Pranis	kpranis@liunagroc.com	Laborers' District Council of MN and ND		81 E Little Canada Road St. Paul MN, 55117 United States	Electronic Service		No	24-67
122	Robert	Prescott	bob.prescott@lowersioux.com	Lower Sioux Indian Community		39527 Highway 1 Morton MN, 56270 United States	Electronic Service		No	24-67
123	Jody	Puddu	jody.puddu@piic.org	Prairie Island Indian Community		5636 Sturgeon Lake Rd Welch MN, 55089 United States	Electronic Service		No	24-67
124	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	24-67
125	Kevin	Reuther	kreuther@mncenter.org	MN Center for Environmental Advocacy		26 E Exchange St, Ste 206 St. Paul MN, 55101-1667 United States	Electronic Service		No	24-67
126	Stephan	Roos	stephan.roos@state.mn.us		Minnesota Department of Agriculture	625 Robert St N Saint Paul MN, 55155-2538 United States	Electronic Service		No	24-67
127	Alan	Roy	alan.roy@whiteearth-nsn.gov	White Earth Nation		White Earth Tribal Headquarters 35500 Eagle View Road Ogema MN, 56569 United States	Electronic Service		No	24-67
128	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	24-67
129	Nathaniel	Runke	nrunke@local49.org			611 28th St. NW Rochester MN, 55901 United States	Electronic Service		No	24-67
130	Zachary	Ruzycki	zruzycki@grenergy.com	Great River Energy		12300 Elm Creek Boulevard Maple Grove MN, 55369 United States	Electronic Service		No	24-67
131	Miranda	Sam	miranda.sam@lowersioux.com	Lower Sioux Indian Community		39527 Reservation Highway 1 PO Box 308 Morton MN,	Electronic Service		No	24-67

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						56270 United States				
132	Adam	Savariego	adams@uppersiouxcommunity-nsn.gov	Upper Sioux Community		5722 Travers Lane PO Box 147 Granite Falls MN, 56241 United States	Electronic Service		No	24-67
133	Ronald J.	Schwartau	rschwartau@noblesce.com	Nobles Electric Cooperative		22636 U.S. Hwy. 59 Worthington MN, 56187 United States	Electronic Service		No	24-67
134	Jessie	Seim	jessie.seim@piic.org	Prairie Island Indian Community		5636 Sturgeon Lake Rd Welch MN, 55089 United States	Electronic Service		No	24-67
135	Darrell	Seki, Sr.	dseki@redlakenation.org			15484 Migizi Drive Red Lake MN, 56671 United States	Electronic Service		No	24-67
136	Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates		7400 Lyndale Ave S Ste 190 Richfield MN, 55423 United States	Electronic Service		Yes	24-67
137	Joel	Smith	jsmith@mnchippewatribe.org	Minnesota Chippewa Tribe		PO Box 217 Cass Lake MN, 56633 United States	Electronic Service		No	24-67
138	Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.		76 W Kellogg Blvd St. Paul MN, 55102 United States	Electronic Service		No	24-67
139	Nizhoni	Smith	nizhoni.smith@lowersioux.com	Lower Sioux Indian Community		PO Box 308 39527 Reservation Highway 1 Morton MN, 56270 United States	Electronic Service		No	24-67
140	Roger	Smith, Sr.	rogermsmithsr@fdlrez.com			1720 Big Lake Road Cloquet MN, 55720 United States	Electronic Service		No	24-67
141	Beth	Soholt	bsoholt@cleangridalliance.org	Clean Grid Alliance		570 Asbury Street Suite 201 St. Paul MN, 55104 United States	Electronic Service		No	24-67
142	Marie	Spry	mariespry@grandportage.com			PO Box 428 Grand Portage MN, 55605 United States	Electronic Service		No	24-67
143	Michael	Stalberger	michael.stalberger@blueearthcountymn.gov	Blue Earth County		410 S 5th Street Mankato MN, 56001 United States	Electronic Service		No	24-67
144	LeRoy	Staples Fairbanks III	leroy.fairbanks@llojibwe.net	Leech Lake Band of Ojibwe		190 Sailstar Drive NW Cass Lake MN, 56633 United States	Electronic Service		No	24-67
145	Byron E.	Starns	byron.starns@stinson.com	STINSON LLP		50 S 6th St Ste 2600 Minneapolis	Electronic Service		No	24-67

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						MN, 55402 United States				
146	Mark	Strohfus	mstrohfus@greenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	24-67
147	Samuel	Strong	sam.strong@redlakenation.org	Red Lake Nation		15484 Migizi Drive Red Lake MN, 56671 United States	Electronic Service		No	24-67
148	Timothy	Sullivan	tsullivan@whe.org	Wright Hennepin Coop. Electric Assn.		6800 Electric Drive PO Box 330 Rockford MN, 55373 United States	Electronic Service		No	24-67
149	David	Sunderman	daves@benco.org	BENCO (DUPLICATE)		PO Box 8 Mankato MN, 56002-0008 United States	Electronic Service		No	24-67
150	Camille	Tanhoff	kamip@uppersiouxcommunity-nsn.gov	Upper Sioux Community		5722 Travers Lane PO BOX 147 Granite Falls MN, 56241 United States	Electronic Service		No	24-67
151	Tim	Thompson	tthompson@lrec.coop	Lake Region Electric Cooperative		PO Box 643 1401 South Broadway Pelican Rapids MN, 56572 United States	Electronic Service		No	24-67
152	Geoffrey	Tolley	geoff.tolley@gmail.com			855 Stanley Road Two Harbors MN, 55616-1176 United States	Electronic Service		No	24-67
153	Caralyn	Trutna	carrie@uppersiouxcommunity-nsn.gov	Upper Sioux Community		Upper Sioux Community P.O. Box 147 Granite Falls MN, 55372 United States	Electronic Service		No	24-67
154	Jackie	Van Norman	jvannorman@greenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	24-67
155	Sam	Villella	sdvillella@gmail.com			10534 Alamo Street NE Blaine MN, 55449 United States	Electronic Service		No	24-67
156	Carla	Vita	carla.vita@state.mn.us	MN DEED		Great Northern Building 12th Floor 180 East Fifth Street St. Paul MN, 55101 United States	Electronic Service		No	24-67
157	Amelia	Vohs	avohs@mncenter.org	Minnesota Center for Environmental Advocacy		1919 University Avenue West Suite 515 St. Paul MN, 55104 United States	Electronic Service		No	24-67

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
158	Trent	Waite	twaite@grenergy.com			null null, null United States	Electronic Service		No	24-67
159	Heather	Westra	heather.westra@piic.org	Prairie Island Indian Community		5636 Sturgeon Lake Rd Welch MN, 55089 United States	Electronic Service		No	24-67
160	Elizabeth	Wheeler	ewheeler@cleangridalliance.org	Clean Grid Alliance		570 Asbury Street Suite 201 St. Paul MN, 55104 United States	Electronic Service		No	24-67
161	Steve	White	steve.white@llojibwe.net	Leech Lake Band of Ojibwe		190 Sailstar Drive NW Cass Lake MN, 56633 United States	Electronic Service		No	24-67
162	Cody	Whitebear	cody.whitebear@piic.org	Prairie Island Indian Community		5636 Sturgeon Lake Road Welch MN, 55089 United States	Electronic Service		No	24-67
163	John	Williams	jwilliams@grenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	24-67
164	Virgil	Wind	virgil.wind@millelacsband.com	Mille Lacs Band of Ojibwe		43408 Oodena Drive Onamia MN, 56359 United States	Electronic Service		No	24-67
165	Joseph	Windler	jwindler@winthrop.com	Winthrop & Weinstine		225 South Sixth Street, Suite 3500 Minneapolis MN, 55402 United States	Electronic Service		No	24-67
166	Laurie	York	laurie.york@whiteearth-nsn.gov	White Earth Reservation Business Committee		PO Box 418 White Earth MN, 56591 United States	Electronic Service		No	24-67
167	Curtis	Zaun	czaun@mNSEIA.org	MnSEIA		PO Box 8141 Saint Paul MN, 55108 United States	Electronic Service		No	24-67
168	Kurt	Zimmerman	kwz@ibew160.org	Local Union #160, IBEW		2909 Anthony Ln St Anthony Village MN, 55418-3238 United States	Electronic Service		No	24-67
169	Patrick	Zomer	pzomer@cozen.com	Cozen O'Connor		150 S. 5th Street, #1200 Minneapolis MN, 55402 United States	Electronic Service		No	24-67