



April 7, 2025

**VIA E-FILING** 

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

Re: In the Matter of the Application of Minnesota Power for Authority to Increase

Rates for Electric Service in Minnesota

MPUC Docket Nos. E015/GR-23-155 and E015/GR-21-335

**Comments Regarding the Company's Prepaid Pension Asset** 

Dear Mr. Seuffert:

ALLETE, Inc. d/b/a Minnesota Power (the "Company") respectfully submits their Comments Regarding the Company's Prepaid Pension Asset.

By copy of this letter, I am providing service to those listed on the service lists on file with the Public Utilities Commission. If you have any questions regarding this filing, please contact me at (651) 592-3963 or <a href="mailto:mbrodin@allete.com">mbrodin@allete.com</a>.

Sincerely,

/s/ Matthew R. Brodin

Matthew R. Brodin ALLETE Senior Attorney

Enclosure

cc: Service Lists

## STATE OF MINNESOTA BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

In the Matter of the Application of Minnesota Power for Authority to Increase Rates for Electric Service in Minnesota MPUC Docket Nos. E-015/GR-21-335, E-015/GR-23-155

MINNESOTA POWER'S COMMENTS REGARDING THE COMPANY'S PREPAID PENSION ASSET

#### **INTRODUCTION**

On November 1, 2021, Minnesota Power (or the "Company") filed a general rate case with the Minnesota Public Utilities Commission ("Commission") seeking an increase in electric rates ("2021 Rate Case"). After a contested case hearing, the Administrative Law Judge ("ALJ") issued his Findings of Fact, Conclusions of Law, and Recommendations (the "ALJ Report") on September 1, 2022. As relevant here, in the ALJ Report, the ALJ provided very detailed findings and conclusions in which the ALJ recommended including the Company's prepaid pension asset in rate base. On February 28, 2023, the Commission issued its Findings of Fact, Conclusions, and Order (the "2021 Rate Case Order"). As part of the Rate Case Order, the Commission declined to adopt the ALJ's recommendation and denied Minnesota Power's request for rate-base treatment of the prepaid pension asset.

<sup>&</sup>lt;sup>1</sup> In the Matter of the Application of Minnesota Power for Authority to Increase Rates for Electric Service in Minnesota, Docket No. E-015/GR-21-335 ("2021 Rate Case"), Findings of Fact, Conclusions, and Order (the "2021 Rate Case Order"), 1 (Feb. 28, 2023).

<sup>&</sup>lt;sup>2</sup> See 2021 Rate Case, Findings of Fact, Conclusions of Law, and Recommendations (the "ALJ Report") (Sept. 1, 2022).

<sup>&</sup>lt;sup>3</sup> *Id.* at 61. In so holding, the ALJ recommended that the Company be allowed to earn a return on investors' cumulative contributions to the pension fund that exceed cumulative expense, as investors are financing a utility employee benefit cost until such costs are included in rates.

<sup>&</sup>lt;sup>4</sup> See 2021 Rate Case Order.

<sup>&</sup>lt;sup>5</sup> *Id*. at 9.

On March 20, 2023, Minnesota Power filed a Petition for Reconsideration and Clarification on the Commission's prepaid pension asset decision, among others.<sup>6</sup> On May 15, 2023, the Commission denied reconsideration of its decision.<sup>7</sup> Minnesota Power subsequently appealed the Commission's decision to the Minnesota Court of Appeals ("2021 Rate Case Appeal").<sup>8</sup>

On November 1, 2023, Minnesota Power filed another general rate case with the Commission seeking an increase in electric rates ("2023 Rate Case"). As part of that rate case, Minnesota Power again sought inclusion of its prepaid pension asset in rate base. On May 3, 2024, the parties jointly filed an executed settlement agreement resolving all issues in the rate case. As relevant here, the parties agreed that if the 2021 Rate Case Appeal resulted in a reversal or modification of the Commission's 2021 Rate Case Order with regard to the prepaid pension asset (which in fact occurred), Minnesota Power would be permitted to include the prepaid pension asset in rate base. As a case of the prepaid pension asset in rate base.

On September 9, 2024, the Court of Appeals reversed the Commission's prepaid pension asset decision, holding that the Commission's decision to exclude Minnesota Power's prepaid pension asset from the rate base is unsupported by substantial evidence and arbitrary and capricious.<sup>13</sup> The Court of Appeals remanded the matter to the Commission to make additional

<sup>&</sup>lt;sup>6</sup> See 2021 Rate Case, Minnesota Power's Petition for Reconsideration and Clarification (Mar. 20, 2023).

<sup>&</sup>lt;sup>7</sup> 2021 Rate Case, Order Denying Petitions for Reconsideration and Granting, in Part, Requests for Clarification, 4 (May 15, 2023).

<sup>&</sup>lt;sup>8</sup> In the Matter of the Application of Minnesota Power for Authority to Increase Rates for Electric Service in Minnesota, Nos. A23-0867, A23-0871, A23-1957 ("2021 Rate Case Appeal"), Relator Minnesota Power's Principal Brief (Mar. 7, 2024).

<sup>&</sup>lt;sup>9</sup> In the Matter of the Application of Minnesota Power for Authority to Increase Electric Service Rates in the State of Minnesota, Docket No. E-015/GR-23-155 ("2023 Rate Case"), Order Accepting and Adopting Agreement Setting Rates (the "2023 Rate Case Order"), 1 (Nov. 25, 2024).

<sup>&</sup>lt;sup>10</sup> 2023 Rate Case, Settlement Agreement, 9 (May 3, 2024).

<sup>&</sup>lt;sup>11</sup> See id.

<sup>&</sup>lt;sup>12</sup> *Id*. at 9.

<sup>&</sup>lt;sup>13</sup> 2021 Rate Case Appeal, Opinion, 35 (Sept. 9, 2024).

findings regarding the prepaid pension asset.<sup>14</sup> The Court of Appeals noted that the Commission may reopen the record on remand in its discretion.<sup>15</sup>

In Staff Briefing Papers issued on October 24, 2024, Staff noted that neither the Commission nor an intervening party appealed the matter to the Minnesota Supreme Court.<sup>16</sup> However, since the Court of Appeals remanded the issue to the Commission, and the Commission would be taking action on the Court of Appeals' remand, the matter was yet to be resolved.<sup>17</sup> Therefore, according to Staff, at that time the settlement's handling of the issue was reasonable.<sup>18</sup> The Commission approved the settlement on November 25, 2024 in its Order Accepting and Adopting Agreement Setting Rates (the "2023 Rate Case Order").<sup>19</sup>

On March 6, 2025, the Commission issued a Notice of Comment Period ("Notice") seeking comments on the following topics:

- 1. Should the Commission reopen the record in Docket No. 21-335 on the issue of the Company's claimed prepaid pension asset remanded to the Commission by the Court of Appeals?
- 2. Should the Commission request that the Department of Commerce seek authority from the Commissioner of Management and Budget to incur costs for specialized technical professional investigative services pursuant to Minn. Stat. § 216B.62, subd. 8?
- 3. What process should the Commission use to make its decision? Parties should comment on the applicability of *Matter of Surveillance and Integrity Review*, 996 N.W.2d 178 (Minn. 2023).
- 4. Should any different process be used to determine the Company's claimed prepaid pension asset in the 2021 rate case compared to the 2023 rate case?
- 5. Are there any other issues to be addressed in these dockets?

<sup>&</sup>lt;sup>14</sup> *Id*.

 $<sup>^{15}</sup>$  *Id*.

<sup>&</sup>lt;sup>16</sup> 2023 Rate Case, Staff Briefing Papers, 22 (Oct. 24, 2024).

<sup>17</sup> Id.

<sup>&</sup>lt;sup>18</sup> *Id* 

<sup>&</sup>lt;sup>19</sup> 2023 Rate Case Order at 7.

Minnesota Power respectfully submits these comments in response to the Commission's Notice, recommending that there is a complete record in Minnesota Power's 2021 Rate Case warranting inclusion of the prepaid pension asset in rate base; that procedurally it would be improper to conduct further proceedings before an ALJ; and that the settlement in the 2023 Rate Case specifically acknowledges that the outcome of that case would depend on the appellate decision in the 2021 Rate Case, as it is the same asset for the same Company. As such, Minnesota Power respectfully submits that the Commission should take up the matter and enter conclusions in both proceedings consistent with the ALJ Report in the 2021 Rate Case, the Court of Appeals' decision, and the settlement in the 2023 Rate Case.

#### **COMMENTS**

1. Should the Commission reopen the record in Docket No. 21-335 on the issue of the Company's claimed prepaid pension asset remanded to the Commission by the Court of Appeals?

The Commission should not reopen the record in the 2021 Rate Case on the issue of Minnesota Power's prepaid pension asset, given the robust record already before the Commission. As acknowledged in the Commission's 2021 Rate Case Order, the proceedings before the ALJ included direct, rebuttal, and surrebuttal testimony; a three-day evidentiary hearing; initial and reply briefs; four public hearings; and written public comments. Several witnesses of the parties specifically provided testimony on the prepaid pension asset, including Company Witness Patrick L. Cutshall, Company Witness Michael Farrell of Willis Towers Watson, Minnesota Department of Commerce ("Department") Witness Nancy A. Campbell, and Large Power Intervenors ("LPI") Witness Michael P. Gorman of Brubaker & Associates, Inc. 121 In short, there were both internal

<sup>&</sup>lt;sup>20</sup> 2021 Rate Case Order at 2.

<sup>&</sup>lt;sup>21</sup> MP-22 at 42-84 (Cutshall Direct); MP-24 at 20-45 (Cutshall Rebuttal); MP-58 (Farrell Rebuttal); DOC-2 at 14-28 (Campbell Direct); DOC-3 at 22-31 (Campbell Surrebuttal); LPI-1 at 8-19 (Gorman Direct); LPI-2 at 2-16 (Gorman Surrebuttal).

party witnesses and external expert witnesses with specific technical expertise in this matter. These parties also extensively briefed the prepaid pension asset issue.<sup>22</sup>

Based on this robust record, the ALJ prepared a comprehensive ALJ Report, including 12 detailed pages of findings of fact, conclusions of law, and recommendations regarding the prepaid pension asset.<sup>23</sup> In the ALJ Report, the ALJ found that "the record supports that it is both reasonable and necessary to include the Company's request for inclusion of the prepaid pension asset in rate base, net of [accumulated deferred income taxes, or ADIT], in the amount of \$43,705,383 (MN Jurisdictional)."<sup>24</sup> Given the extensive record in the 2021 Rate Case, including the findings in the ALJ Report, the Commission has all information necessary to implement the Court's decision reversing the Commission's 2021 Rate Case Order with regard to the prepaid pension asset. Therefore, it would be of little value, and would be an unnecessary use of time and resources, to reopen the record in the 2021 Rate Case.

Additionally, pursuant to *In re Minnegasco*,<sup>25</sup> the Commission can implement the Court's decision on Minnesota Power's prepaid pension asset without reopening the record. In that case, the Minnesota Supreme Court held that the Commission, on remand, has authority to order a recoupment remedy to compensate a public utility for lost revenue occasioned by a rate order reversed on appeal as exceeding the Commission's statutory authority.<sup>26</sup> Because the Court of Appeals reversed the Commission's 2021 Rate Case Order excluding the Company's prepaid pension asset from rate base as unlawful and remanded the matter to the Commission, the

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<sup>&</sup>lt;sup>22</sup> 2021 Rate Case, Minnesota Power's Initial Post-hearing Brief, 44-68 (July 15, 2022); 2021 Rate Case, Initial Brief of the Minnesota Department of Commerce, 44-48 (July 15, 2022); 2021 Rate Case, Post-Hearing Brief of the Large Power Intervenors, 15-16 (July 15, 2022); 2021 Rate Case, Minnesota Power's Reply Brief, 18-26 (Aug. 1, 2022); 2021 Rate Case, Reply Brief of the Minnesota Department of Commerce, 13-18 (Aug. 1, 2022); 2021 Rate Case, Post-Hearing Reply Brief of the Large Power Intervenors, 15-20 (Aug. 1, 2022).

<sup>&</sup>lt;sup>23</sup> See ALJ Report at 50-61.

<sup>&</sup>lt;sup>24</sup> *Id*. at 61.

<sup>&</sup>lt;sup>25</sup> 565 N.W.2d 706 (Minn. 1997).

<sup>&</sup>lt;sup>26</sup> *Id.* at 711-13.

Commission has authority to simply order that the prepaid pension asset now be included in rate base, consistent with the ALJ Report and the Court's decision on appeal. Further, the Company has already agreed, in the context of the 2023 Rate Case settlement, that the amounts to be recovered can be carried as a regulatory asset and deferred for recovery until a future time, where the nature of recovery (e.g., with an appropriate amortization period) can be determined. Thus, there is no basis to reopen the record in the 2021 Rate Case.

2. Should the Commission request that the Department of Commerce seek authority from the Commissioner of Management and Budget to incur costs for specialized technical professional investigative services pursuant to Minn. Stat. § 216B.62, subd. 8?

The Commission should not request that the Department seek authority from the Commissioner of Management and Budget to incur costs for specialized technical professional investigative services. As explained above, the existing record before the Commission is robust, and there would be no value in reopening the record in the 2021 Rate Case to supplement it with additional expert opinions given the technical professional investigative services already supplied in that record. The issue of the inclusion of prepaid pension assets in rate base has been an issue in multiple of Minnesota Power's rate cases. With that knowledge, the Department provided testimony on Minnesota Power's prepaid pension asset from Department Witness Campbell, a Financial Analyst/Analyst Coordinator at the Department to oppose inclusion of the prepaid pension asset in rate base in both the 2021 and 2023 Rate Cases.<sup>27</sup> If it were necessary for the Department to retain an outside expert, the Department had the knowledge and opportunity to make a request at the outset of those cases but did not, in either the 2021 or 2023 Rate Case. In addition, LPI provided outside technical testimony on the prepaid pension asset from LPI Witness

<sup>&</sup>lt;sup>27</sup> DOC-2 at 14-28 (Campbell Direct); DOC-3 at 22-31 (Campbell Surrebuttal).

Gorman.<sup>28</sup> Further, Witnesses Cutshall, Farrell, Campbell, and Gorman all provided detailed testimony regarding the issue on which the Court of Appeals remanded the matter in the 2021 Rate Case: the extent to which the prepaid pension asset was funded by investors rather than customers.<sup>29</sup>

On that detailed record, the ALJ specifically concluded that "[t]he entire prepaid pension asset that the Company seeks to include in rate base resulted from investor contributions." Importantly, the ALJ found that "though the prepaid pension asset earns an investment return, every dollar of that investment return is used to reduce the pension expense charged to customers. Investors receive no direct benefit from the investment return. The fact that customers benefit from the investment return on the prepaid pension assets does not justify denying investors an investment return on the prepaid pension asset, but in fact underscores why investors are entitled to a return." The ALJ also found that LPI Witness Gorman's own testimony showed that customers get the benefit of negative pension expense being embedded in rates. Consequently, there is no basis or need for additional technical expertise that would merely overlap with the testimony already provided.

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<sup>&</sup>lt;sup>28</sup> LPI-1 at 8-19 (Gorman Direct); LPI-2 at 2-16 (Gorman Surrebuttal).

<sup>&</sup>lt;sup>29</sup> MP-22 at 43 (Cutshall Direct); MP-24 at 23-24, 35, 38-40 (Cutshall Rebuttal); MP-58 at 9-10 (Farrell Rebuttal); DOC-2 at 24-25 (Campbell Direct); DOC-3 at 25-26 (Campbell Surrebuttal); LPI-1 at 14-19 (Gorman Direct); LPI-2 at 11-12 (Gorman Surrebuttal).

<sup>&</sup>lt;sup>30</sup> ALJ Report at 61.

<sup>&</sup>lt;sup>31</sup> *Id.* at 60. In making this determination, the ALJ noted that "[t]he parties agree that shareholders provide cash and stock contributions to the pension fund, whereas customers provide expense recovery through rates, and do not dispute that earnings from plan assets reduce pension expense as shown by Table 7 and Schedules 14 and 15 to Mr. Cutshall's Direct Testimony." *Id.* (citing MP-23 at 56, Schedule 14 (showing the benefit to customers of Company contributions to the pension fund), and Schedule 15 at 20 (showing how the earned return on assets (EROA) reduces pension expense) (Cutshall Direct)). Additionally, the ALJ found that "customers receive 100 percent of the market return benefits because all of the market returns on the pension plan trust reduce pension expense, which results in lower rates." ALJ Report at 56 (citing MP-23 at 56, Table 7 (Cutshall Direct); MP-24 at 36-37 (Cutshall Rebuttal)). LPI Witness Gorman also acknowledged this fact in his testimony. *See* LPI-1 at 11 (Gorman Direct) (stating that "a [prepaid pension asset] created through excess returns on the pension trust does benefit customers through reduced pension expense.").

<sup>&</sup>lt;sup>32</sup> ALJ Report at 56, para. 236 and n.361.

3. What process should the Commission use to make its decision? Parties should comment on the applicability of *Matter of Surveillance and Integrity Review*, 996 N.W.2d 178 (Minn. 2023).

In re Surveillance & Integrity Review Section stands for the proposition that an agency does not have authority to remand a case to an ALJ for further fact-finding or development of the record after the ALJ has issued a report.<sup>33</sup> The ALJ report constitutes the final decision in the case, and the agency only has three options after receiving the ALJ report: to accept the ALJ report as the agency's final decision; to modify the ALJ report; or to reject the ALJ report.<sup>34</sup>

Under *In re Surveillance & Integrity Review Section*, if the Commission lacks authority to remand a case to an ALJ for further fact-finding or development of the record after the ALJ has issued a report, then it would certainly lack authority to do so after an appellate court has issued a binding decision. The ALJ Report in the 2021 Rate Case with regard to the Company's prepaid pension asset should be treated as final, and as a result of the Minnesota Supreme Court decision, the Commission may not remand the matter to the ALJ. Further, as explained above, the existing record before the Commission is robust.

For these reasons, Minnesota Power requests that the Commission issue an Order in the 2021 Rate Case Order (i) aligning with the ALJ Report on the issue of the prepaid pension asset; (ii) directing the Company to make a compliance filing, pursuant to Minn. Stat. § 216B.16, subd. 3, applying the cost of capital authorized in the 2021 Rate Case to the prepaid pension asset net of ADIT; and (iii) determining the amount to be deferred as measured from the Commission's final determination (the 2021 Rate Case Order) through the Commission's final order in the Company's

<sup>33 996</sup> N.W.2d 178, 184-87 (Minn. 2023).

 $<sup>^{34}</sup>$  *Id*.

2023 Rate Case.<sup>35</sup> As held in *In re Minnegasco*, a public utility is entitled to compensation for lost revenue occasioned by a rate order reversed on appeal as unlawful.<sup>36</sup>

# 4. Should any different process be used to determine the Company's claimed prepaid pension asset in the 2021 rate case compared to the 2023 rate case?

The same process should be used to determine Minnesota Power's prepaid pension asset for both the 2021 Rate Case and the 2023 Rate Case. As discussed with respect to the 2021 Rate Case, for the 2023 Rate Case, the Commission should allow Minnesota Power to make a compliance filing, pursuant to Minn. Stat. § 216B.16, subd. 3, including the amount of the return that the Company is entitled to earn on the prepaid pension asset, measured from the Commission's final determination (the 2023 Rate Case Order).

While the prepaid pension asset in the 2023 Rate Case differs in the amount due to the different test year, it is otherwise the same asset, and the Company supported its request for rate-base treatment of the asset with very similar internal and external expert evidence.<sup>37</sup> There were not competing calculations of the dollar amount of the Company's prepaid pension asset; rather, the issues presented by LPI and the Department were the same as those they presented in the 2021 Rate Case and which were rejected through detailed findings in the ALJ Report. Further, the parties jointly filed an executed settlement agreement resolving all issues in the rate case, including agreeing that if the 2021 Rate Case Appeal resulted in a reversal or modification of the Commission's 2021 Rate Case Order with regard to the prepaid pension asset (which in fact occurred), Minnesota Power would be permitted to include the prepaid pension asset in rate base.<sup>38</sup> The Commission approved the settlement on November 25, 2024 in the 2023 Rate Case Order.<sup>39</sup>

<sup>&</sup>lt;sup>35</sup> The 2023 Rate Case settlement would then account for the prepaid pension asset in rate base as of the final determination in that rate case, through final determinations in a future rate case.

<sup>&</sup>lt;sup>36</sup> 565 N.W.2d at 711-13.

<sup>&</sup>lt;sup>37</sup> MP-23 at 4-56 (Cutshall Direct).

<sup>&</sup>lt;sup>38</sup> Settlement Agreement at 9.

<sup>&</sup>lt;sup>39</sup> 2023 Rate Case Order at 7.

Thus, there is no need for any additional or different process other than the compliance filing to apply the authorized rate of return set forth in the 2023 Rate Case and determine the amount to be included at a future time.

#### 5. Are there any other issues to be addressed in these dockets?

In terms of cost recovery, as explained above, the Commission should permit Minnesota Power to make a compliance filing, pursuant to Minn. Stat. § 216B.16, subd. 3, including the amount of the return that the Company is entitled to earn on the prepaid pension asset, measured from the Commission's final determination in each rate case. Minnesota Power would carry these amounts in a regulatory asset, deferring to a future rate case how the amounts should be recovered.

#### **CONCLUSION**

Minnesota Power appreciates the opportunity to respond to the topics open for comment in this matter and engage in the discussion through these proceedings. As stated above, the existing records in the 2021 Rate Case and the 2023 Rate Case are extensive and should not be reopened for further fact-finding or development of the record. The Commission has all information necessary to determine the Company's prepaid pension asset for both cases. Therefore, Minnesota Power requests that the Commission issue an Order accordingly, and direct a compliance filing as to the amount of the return that the Company is entitled to earn on the prepaid pension asset in each case. Additionally, Minnesota Power should be permitted to establish a regulatory asset to hold these amounts so that the Commission can determine the means of cost recovery in a future rate case.

Dated: April 7, 2025 Respectfully submitted,

### /s/ Matthew R. Brodin

Matthew R. Brodin Senior Attorney 30 West Superior Street Duluth, MN 55802-2093 Telephone: (218) 355-3152

mbrodin@allete.com

IN THE MATTER OF THE APPLICATION OF MINNESOTA POWER FOR AUTHORITY TO INCREASE RATES FOR ELECTRIC SERVICE IN MINNESOTA MPUC DOCKET NOS. E015/GR-23-155 AND E015/GR-21-335

#### **CERTIFICATE OF SERVICE**

Carly Krause certifies that on the 7<sup>h</sup> day of April, 2025, on behalf of Minnesota Power, she efiled a true and correct copy of **Minnesota Power's Comments Regarding the Company's Prepaid Pension Asset** via <u>eDockets</u>. Said document was also served via Electronic Service or U.S. Mail as designated on the attached Official Service Lists on file with the Minnesota Public Utilities Commission in the above-referenced dockets.

/s/ Carly Krause Carly Krause

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39	Richard	Johnson	rick.johnson@lawmoss.com	Moss & Barnett		150 S. 5th Street Suite 1200 Minneapolis MN, 55402 United States	Electronic Service		No	23- 155Official
40	Sarah	Johnson Phillips	sjphillips@stoel.com	Stoel Rives LLP		33 South Sixth Street Suite 4200 Minneapolis MN, 55402 United States	Electronic Service		No	23- 155Official
41	Nick	Kaneski	nick.kaneski@enbridge.com	Enbridge Energy Company, Inc.		11 East Superior St Ste 125 Duluth MN, 55802 United States	Electronic Service		No	23- 155Official
42	Nicolas	Kaylor	nkaylor@mojlaw.com			120 South 6th St Ste 2400 Minneapolis MN, 55402 United States	Electronic Service		No	23- 155Official
43	Travis	Kolari		Keetac		PO Box 217 Keewatin MN, 55753 United States	Paper Service		No	23- 155Official
44	Michael	Krikava	mkrikava@taftlaw.com	Taft Stettinius & Hollister LLP		2200 IDS Center 80 S 8th St Minneapolis MN, 55402 United States	Electronic Service		No	23- 155Official
45	Becky	Lammi	cityclerk@ci.aurora.mn.us	City of Aurora		16 W 2nd Ave N PO Box 160 Aurura MN, 55705 United States	Electronic Service		No	23- 155Official
46	Carmel	Laney	carmel.laney@stoel.com	Stoel Rives LLP		33 South Sixth Street Suite 4200 Minneapolis MN, 55402 United States	Electronic Service		No	23- 155Official
47	David	Langmo	david.langmo@sappi.com	Sappi North America		P O Box 511 2201 Avenue B Cloquet MN, 55720 United States	Electronic Service		No	23- 155Official
48	Emily	Larson	elarson@duluthmn.gov	City of Duluth		411 W 1st St Rm 403 Duluth MN, 55802 United States	Electronic Service		No	23- 155Official
49	James D.	Larson	james.larson@avantenergy.com	Avant Energy Services		220 S 6th St Ste 1300 Minneapolis MN, 55402 United States	Electronic Service		No	23- 155Official
50	Amber	Lee	amber.lee@stoel.com	Stoel Rives LLP		33 S. 6th Street Suite 4200 Minneapolis MN, 55402 United States	Electronic Service		No	23- 155Official
51	Annie	Levenson Falk	annielf@cubminnesota.org	Citizens Utility Board of		332 Minnesota	Electronic Service		No	23- 155Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
				Minnesota		Street, Suite W1360 St. Paul MN, 55101 United States				
52	LeRoger	Lind	llind@yahoo.com	Save Lake Superior Association		P.O. Box 101 Two Harbors MN, 55616 United States	Electronic Service		No	23- 155Official
53	Eric	Lindberg	elindberg@mncenter.org	Minnesota Center for Environmental Advocacy		1919 University Avenue West Suite 515 Saint Paul MN, 55104- 3435 United States	Electronic Service		No	23- 155Official
54	Eric	Lipman	eric.lipman@state.mn.us		Office of Administrative Hearings	PO Box 64620 St. Paul MN, 55164-0620 United States	Electronic Service		Yes	23- 155Official
55	Patrick	Loupin	patrickloupin@packagingcorp.com	Boise Cascade Corporation		PO Box 990050 Boise ID, 83799-0050 United States	Electronic Service		No	23- 155Official
56	Susan	Ludwig	sludwig@mnpower.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	23- 155Official
57	Kavita	Maini	kmaini@wi.rr.com	KM Energy Consulting, LLC		961 N Lost Woods Rd Oconomowoc WI, 53066 United States	Electronic Service		No	23- 155Official
58	Discovery	Manager	discoverymanager@mnpower.com	Minnesota Power		30 W Superior St Duluth MN, 55802 United States	Electronic Service		No	23- 155Official
59	Sarah	Manchester	sarah.manchester@sappi.com	Sappi North American		255 State Street Floor 4 Boston MA, 02109-2617 United States	Electronic Service		No	23- 155Official
60	Robert	Manning	robert.manning@state.mn.us		Public Utilities Commission	121 7th Place East Suite 350 Saint Paul MN, 55101 United States	Electronic Service		No	23- 155Official
61	Ashley	Marcus	ashley.marcus@state.mn.us		Public Utilities Commission	121 7th Place East Suite 350 St. Paul MN, 55101 United States	Electronic Service		No	23- 155Official
62	Emily	Marshall	emarshall@lourismarshall.com	Miller O'Brien Jensen, PA		120 S. 6th Street Suite 2400 Minneapolis MN, 55402 United States	Electronic Service		No	23- 155Official
63	Keith	Matzdorf	keith.matzdorf@sappi.com	Sappi Fine Paper North America		PO Box 511 2201 Avenue B Cloquet MN, 55720 United States	Electronic Service		No	23- 155Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	Trade	Service List Name
64	Daryl	Maxwell	dmaxwell@hydro.mb.ca	Manitoba Hydro		360 Portage Ave FL 16 PO Box 815, Station Main Winnipeg MB, R3C 2P4 Canada	Electronic Service		No	23- 155Official
65	Matthew	McClincy	mmcclincy@usg.com	USG		35 Arch Street Clouqet MN, 55720 United States	Electronic Service		No	23- 155Official
66	Craig	McDonnell	craig.mcdonnell@state.mn.us		Minnesota Pollution Control Agency	520 Lafayette Road St. Paul MN, 55101 United States	Electronic Service		No	23- 155Official
67	Natalie	McIntire	natalie.mcintire@gmail.com	Wind on the Wires		570 Asbury St Ste 201 Saint Paul MN, 55104- 1850 United States	Electronic Service		No	23- 155Official
68	Stephen	Melchionne	stephen.melchionne@ag.state.mn.us		Office of the Attorney General - Department of Commerce	Minnesota Street, Ste. 1400 St. Paul MN, 55101 United States	Electronic Service		No	23- 155Official
69	Kimberly	Middendorf	kimberly.middendorf@state.mn.us		Office of Administrative Hearings	PO Box 64620 600 Robert St N Saint Paul MN, 55164- 0620 United States	Electronic Service		No	23- 155Official
70	David	Moeller	dmoeller@allete.com	Minnesota Power			Electronic Service		No	23- 155Official
71	Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP		33 South Sixth St Ste 4200 Minneapolis MN, 55402 United States	Electronic Service		No	23- 155Official
72	James	Mortenson	james.mortenson@state.mn.us		Office of Administrative Hearings	PO BOX 64620 St. Paul MN, 55164-0620 United States	Electronic Service		No	23- 155Official
73	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	23- 155Official
74	Travis	Murray	travis.murray@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	445 Minnesota St Ste 1400 Saint Paul MN, 55101 United States	Electronic Service		Yes	23- 155Official
75	David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency		220 South Sixth Street Suite 1300 Minneapolis MN, 55402 United States	Electronic Service		No	23- 155Official
76	Michael	Noble	noble@fresh-energy.org	Fresh Energy		408 Saint Peter St Ste 350 Saint Paul MN, 55102 United States	Electronic Service		No	23- 155Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
77	Rolf	Nordstrom	rnordstrom@gpisd.net	Great Plains Institute		2801 21ST AVE S STE 220 Minneapolis MN, 55407- 1229 United States	Electronic Service		No	23- 155Official
78	M. William	O'Brien	bobrien@mojlaw.com	Miller O'Brien Jensen, P.A.		120 S 6th St Ste 2400 Minneapolis MN, 55402 United States	Electronic Service		No	23- 155Official
79	Christopher J.	Oppitz		-		PO Box 910 Park Rapids MN, 56470- 0910 United States	Paper Service		No	23- 155Official
80	Elanne	Palcich	epalcich@cpinternet.com	Save Our Sky Blue Waters		P.O. Box 3661 Duluth MN, 55803 United States	Electronic Service		No	23- 155Official
81	Max	Peters	maxp@cohasset-mn.com	City of Cohasset		305 NW First Ave Cohasset MN, 55721 United States	Electronic Service		No	23- 155Official
82	Jennifer	Peterson	jjpeterson@mnpower.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	23- 155Official
83	Christine	Pham	christine.pham@state.mn.us		Public Utilities Commission	121 7th place E, suite 350 Saint Paul MN, 55101 United States	Electronic Service		No	23- 155Official
84	Jeff	Pollock	jcp@jpollockinc.com	J. Pollock Inc.		Suite 335 12655 Olive Boulevard St. Louis MO, 63141 United States	Electronic Service		No	23- 155Official
85	Tolaver	Rapp	tolaver.rapp@cliffsnr.com	Cliffs Natural Resources		200 Public Square Suite 3400 Cleveland OH, 44114- 2318 United States	Electronic Service		No	23- 155Official
86	Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	1400 BRM Tower 445 Minnesota St St. Paul MN, 55101-2131 United States	Electronic Service		Yes	23- 155Official
87	Kevin	Reuther	kreuther@mncenter.org	MN Center for Environmental Advocacy		26 E Exchange St, Ste 206 St. Paul MN, 55101-1667 United States	Electronic Service		No	23- 155Official
88	Ralph	Riberich	rriberich@uss.com	United States Steel Corp		600 Grant St Ste 2028 Pittsburgh PA, 15219 United States	Electronic Service		No	23- 155Official
89	Buddy	Robinson	buddy@citizensfed.org	Minnesota Citizens Federation NE		2110 W. 1st Street Duluth MN, 55806 United States	Electronic Service		No	23- 155Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
90	Santi	Romani		United Taconite		PO Box 180 Eveleth MN, 55734 United States	Paper Service		No	23- 155Official
91	Susan	Romans	sromans@allete.com	Minnesota Power		30 West Superior Street Legal Dept Duulth MN, 55802 United States	Electronic Service		No	23- 155Official
92	Peter	Scholtz	peter.scholtz@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	Suite 1400 445 Minnesota Street St. Paul MN, 55101-2131 United States	Electronic Service		No	23- 155Official
93	Robert H.	Schulte	rhs@schulteassociates.com	Schulte Associates LLC		1742 Patriot Rd Northfield MN, 55057 United States	Electronic Service		No	23- 155Official
94	Christine	Schwartz	regulatory.records@xcelenergy.com	Xcel Energy		414 Nicollet Mall FL 7 Minneapolis MN, 55401- 1993 United States	Electronic Service		No	23- 155Official
95	Will	Seuffert	will.seuffert@state.mn.us		Public Utilities Commission	121 7th PI E Ste 350 Saint Paul MN, 55101 United States	Electronic Service		Yes	23- 155Official
96	Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates		7400 Lyndale Ave S Ste 190 Richfield MN, 55423 United States	Electronic Service		No	23- 155Official
97	Doug	Shoemaker	dougs@charter.net	Minnesota Renewable Energy		2928 5th Ave S Minneapolis MN, 55408 United States	Electronic Service		No	23- 155Official
98	Brett	Skyles	brett.skyles@co.itasca.mn.us	Itasca County		123 NE Fourth Street Grand Rapids MN, 55744- 2600 United States	Electronic Service		No	23- 155Official
99	Richard	Staffon	rcstaffon@msn.com	W. J. McCabe Chapter, Izaak Walton League of America		1405 Lawrence Road Cloquet MN, 55720 United States	Electronic Service		No	23- 155Official
100	James M	Strommen	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered		150 S 5th St Ste 700 Minneapolis MN, 55402 United States	Electronic Service		No	23- 155Official
101	Eric	Swanson	eswanson@winthrop.com	Winthrop & Weinstine		225 S 6th St Ste 3500 Capella Tower Minneapolis MN, 55402- 4629 United States	Electronic Service		No	23- 155Official
102	Robert	Tammen	bobtammen@frontiernet.net			PO Box 398 Soudan MN, 55782 United States	Electronic Service		No	23- 155Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	Trade	Service List Name
103	Jim	Tieberg	jtieberg@polymetmining.com	PolyMet Mining, Inc.		PO Box 475 County Highway 666 Hoyt Lakes MN, 55750 United States	Electronic Service		No	23- 155Official
104	Claire	Vatalaro	cvatalaro@allete.com	Allete		30 W Superior St Duluth MN, 55802 United States	Electronic Service		No	23- 155Official
105	Kodi	Verhalen	kverhalen@taftlaw.com	Taft Stettinius & Hollister LLP		80 S 8th St Ste 2200 Minneapolis MN, 55402 United States	Electronic Service		No	23- 155Official
106	Kevin	Walli	kwalli@fryberger.com	Fryberger, Buchanan, Smith & Frederick		380 St. Peter St Ste 710 St. Paul MN, 55102 United States	Electronic Service		No	23- 155Official
107	Laurie	Williams	laurie.williams@sierraclub.org	Sierra Club		Environmental Law Program 1536 Wynkoop St Ste 200 Denver CO, 80202 United States	Electronic Service		No	23- 155Official
108	Scott	Zahorik	scott.zahorik@aeoa.org	Arrowhead Economic Opportunity Agency		702 S. 3rd Avenue Virginia MN, 55792 United States	Electronic Service		No	23- 155Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
1	Kevin	Adams	kadams@caprw.org	Community Action Partnership of Ramsey & Washington Counties		450 Syndicate St N Ste 35 Saint Paul MN, 55104 United States	Electronic Service		No	21- 33521- 335
2	Lori	Andresen	info@sosbluewaters.org	Save Our Sky B <b>l</b> ue Waters		P.O. Box 3661 Duluth MN, 55803 United States	Electronic Service		No	21- 33521- 335
3	Jessica L	Bayles	jessica.bayles@stoel.com	Stoel Rives LLP		1150 18th St NW Ste 325 Washington DC, 20036 United States	Electronic Service		No	21- 33521- 335
4	Elizabeth	Brama	ebrama@taftlaw.com	Taft Stettinius & Hollister LLP		2200 IDS Center 80 South 8th Street Minneapolis MN, 55402 United States	Electronic Service		No	21- 33521- 335
5	Jon	Brekke	jbrekke@grenergy.com	Great River Energy		12300 Elm Creek Boulevard Maple Grove MN, 55369- 4718 United States	Electronic Service		No	21- 33521- 335
6	Matthew	Brodin	mbrodin@allete.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	21- 33521- 335
7	Christina	Brusven	cbrusven@fredlaw.com	Fredrikson Byron		60 S 6th St Ste 1500 Minneapolis MN, 55402- 4400 United States	Electronic Service		No	21- 33521- 335
8	Jennifer	Cady	jjcady@mnpower.com	Minnesota Power		30 W Superior St Duluth MN, 55802 United States	Electronic Service		No	21- 33521- 335
9	David	Cartella	david.cartella@cliffsnr.com	Cliffs Natural Resources Inc.		200 Public Square Ste 3300 Cleveland OH, 44114-2315 United States	Electronic Service		No	21- 33521- 335
10	Greg	Chandler	greg.chandler@upm.com	UPM Blandin Paper		115 SW First St Grand Rapids MN, 55744 United States	Electronic Service		No	21- 33521- 335
11	Steve W.	Chriss	stephen.chriss@walmart.com	Wal-Mart		2001 SE 10th St. Bentonville AR, 72716- 5530 United States	Electronic Service		No	21- 33521- 335
12	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	21- 33521- 335
13	Hillary	Creurer	hcreurer@allete.com	Minnesota Power		30 W Superior St Duluth MN, 55802 United States	Electronic Service		No	21- 33521- 335

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
14	Patrick	Cutshall	pcutshall@allete.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		Yes	21- 33521- 335
15	Lisa	Daniels	lisadaniels@windustry.org	Windustry		201 Ridgewood Ave Minneapolis MN, 55403 United States	Electronic Service		No	21- 33521- 335
16	Richard	Dornfeld	richard.dornfeld@ag.state.mn.us		Office of the Attorney General - Department of Commerce	Minnesota Attorney General's Office 445 Minnesota Street, Suite 1800 Saint Paul MN, 55101 United States	Electronic Service		No	21- 33521- 335
17	J.	Drake Hamilton	hamilton@fresh-energy.org	Fresh Energy		408 St Peter St Ste 350 Saint Paul MN, 55101 United States	Electronic Service		No	21- 33521- 335
18	Brian	Edstrom	briane@cubminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota St Ste W1360 Saint Paul MN, 55101 United States	Electronic Service		No	21- 33521- 335
19	Ron	Elwood	relwood@mnlsap.org	Legal Services Advocacy Project		970 Raymond Avenue Suite G-40 Saint Paul MN, 55114 United States	Electronic Service		No	21- 33521- 335
20	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	21- 33521- 335
21	Frank	Frederickson	ffrederickson@mnpower.com	Minnesota Power		30 W Superior St. Duluth MN, 55802 United States	Electronic Service		Yes	21- 33521- 335
22	Edward	Garvey	garveyed@aol.com	Residence		32 Lawton St Saint Paul MN, 55102 United States	Electronic Service		No	21- 33521- 335
23	John	Gasele	jgasele@fryberger.com	Fryberger Buchanan Smith & Frederick PA		700 Lonsdale Building 302 W Superior St Ste 700 Duluth MN, 55802 United States	Electronic Service		No	21- 33521- 335
24	Barbara	Gervais	toftemn@boreal.org	Town of Tofte		P O Box 2293 7240 Tofte Park Road Tofte MN, 55615 United States	Electronic Service		No	21- 33521- 335
25	Jerome	Hall	hallj@stlouiscountymn.gov	Saint Louis County Property Mgmt Dept		Duluth Courthouse 100 N 5th Ave W Rm 515 Duluth MN, 55802-1209 United States	Electronic Service		No	21- 33521- 335

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
26	Adam	Heinen	aheinen@dakotaelectric.com	Dakota Electric Association		4300 220th St W Farmington MN, 55024 United States	Electronic Service		No	21- 33521- 335
27	Annete	Henkel	mui@mnutilityinvestors.org	Minnesota Utility Investors		413 Wacouta Street #230 St.Paul MN, 55101 United States	Electronic Service		No	21- 33521- 335
28	Valerie	Herring	vherring@taftlaw.com	Taft Stettinius & Hollister LLP		2200 IDS Center 80 S. Eighth Street Minneapolis MN, 55402 United States	Electronic Service		No	21- 33521- 335
29	Katherine	Hinderlie	katherine,hinderlie@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	445 Minnesota St Suite 1400 St. Paul MN, 55101-2134 United States	Electronic Service		No	21- 33521- 335
30	Lori	Hoyum	lhoyum@mnpower.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	21- 33521- 335
31	James	Jarvi		Minnesota Ore Operations - U S Steel		P O Box 417 Mountain Iron MN, 55768 United States	Paper Service		No	21- 33521 <b>-</b> 335
32	Alan	Jenkins	aj@jenkinsatlaw.com	Jenkins at Law		2950 Yellowtail Ave. Marathon FL, 33050 United States	Electronic Service		No	21- 33521- 335
33	Kelsey	Johnson	kjohnson@taconite.org	Iron Mining Association of Minnesota		1003 Discovery Drive Chisholm MN, 55719 United States	Electronic Service		No	21- 33521- 335
34	Richard	Johnson	rick.johnson@lawmoss.com	Moss & Barnett		150 S. 5th Street Suite 1200 Minneapolis MN, 55402 United States	Electronic Service		No	21- 33521- 335
35	Sarah	Johnson Phillips	sjphillips@stoel.com	Stoel Rives LLP		33 South Sixth Street Suite 4200 Minneapolis MN, 55402 United States	Electronic Service		No	21- 33521- 335
36	Nick	Kaneski	nick.kaneski@enbridge.com	Enbridge Energy Company, Inc.		11 East Superior St Ste 125 Duluth MN, 55802 United States	Electronic Service		No	21- 33521- 335
37	Travis	Kolari		Keetac		PO Box 217 Keewatin MN, 55753 United States	Paper Service		No	21- 33521- 335
38	Michael	Krikava	mkrikava@taftlaw.com	Taft Stettinius & Hollister LLP		2200 IDS Center 80 S 8th St Minneapolis MN, 55402 United States	Electronic Service		No	21- 33521- 335

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	Trade	Service List Name
39	Becky	Lammi	cityclerk@ci.aurora.mn.us	City of Aurora		16 W 2nd Ave N PO Box 160 Aurura MN, 55705 United States	Electronic Service		No	21- 33521- 335
40	Carmel	Laney	carmel.laney@stoel.com	Stoel Rives LLP		33 South Sixth Street Suite 4200 Minneapolis MN, 55402 United States	Electronic Service		No	21- 33521- 335
41	David	Langmo	david.langmo@sappi.com	Sappi North America		P O Box 511 2201 Avenue B Cloquet MN, 55720 United States	Electronic Service		No	21- 33521- 335
42	Emily	Larson	elarson@duluthmn.gov	City of Duluth		411 W 1st St Rm 403 Duluth MN, 55802 United States	Electronic Service		No	21- 33521- 335
43	James D.	Larson	james.larson@avantenergy.com	Avant Energy Services		220 S 6th St Ste 1300 Minneapolis MN, 55402 United States	Electronic Service		No	21- 33521- 335
44	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	21- 33521- 335
45	LeRoger	Lind	llind@yahoo.com	Save Lake Superior Association		P.O. Box 101 Two Harbors MN, 55616 United States	Electronic Service		No	21- 33521- 335
46	Eric	Lindberg	elindberg@mncenter.org	Minnesota Center for Environmental Advocacy		1919 University Avenue West Suite 515 Saint Paul MN, 55104- 3435 United States	Electronic Service		No	21- 33521- 335
47	Patrick	Loupin	patrickloupin@packagingcorp.com	Boise Cascade Corporation		PO Box 990050 Boise ID, 83799-0050 United States	Electronic Service		No	21- 33521- 335
48	Susan	Ludwig	sludwig@mnpower.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	21- 33521- 335
49	Kavita	Maini	kmaini@wi.rr.com	KM Energy Consulting, LLC		961 N Lost Woods Rd Oconomowoc WI, 53066 United States	Electronic Service		No	21- 33521- 335
50	Discovery	Manager	discoverymanager@mnpower.com	Minnesota Power		30 W Superior St Duluth MN, 55802 United States	Electronic Service		No	21- 33521- 335
51	Sarah	Manchester	sarah.manchester@sappi.com	Sappi North American		255 State Street Floor 4 Boston MA, 02109-2617 United States	Electronic Service		No	21- 33521- 335

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
52	Keith	Matzdorf	keith.matzdorf@sappi.com	Sappi Fine Paper North America		PO Box 511 2201 Avenue B Cloquet MN, 55720 United States	Electronic Service		No	21- 33521- 335
53	Daryl	Maxwell	dmaxwell@hydro.mb.ca	Manitoba Hydro		360 Portage Ave FL 16 PO Box 815, Station Main Winnipeg MB, R3C 2P4 Canada	Electronic Service		No	21- 33521- 335
54	Matthew	McClincy	mmcclincy@usg.com	USG		35 Arch Street Clouqet MN, 55720 United States	Electronic Service		No	21- 33521- 335
55	Craig	McDonnell	craig.mcdonnell@state.mn.us		Minnesota Pollution Control Agency	520 Lafayette Road St. Paul MN, 55101 United States	Electronic Service		No	21- 33521- 335
56	Natalie	McIntire	natalie.mcintire@gmail.com	Wind on the Wires		570 Asbury St Ste 201 Saint Paul MN, 55104- 1850 United States	Electronic Service		No	21- 33521- 335
57	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	21- 33521- 335
58	David	Moeller	dmoeller@allete.com	Minnesota Power			Electronic Service		No	21- 33521- 335
59	Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP		33 South Sixth St Ste 4200 Minneapolis MN, 55402 United States	Electronic Service		No	21- 33521- 335
60	James	Mortenson	james.mortenson@state.mn.us		Office of Administrative Hearings	PO BOX 64620 St. Paul MN, 55164-0620 United States	Electronic Service		No	21- 33521- 335
61	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	21- 33521- 335
62	Travis	Murray	travis.murray@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	445 Minnesota St Ste 1400 Saint Paul MN, 55101 United States	Electronic Service		No	21- 33521- 335
63	David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency		220 South Sixth Street Suite 1300 Minneapolis MN, 55402 United States	Electronic Service		No	21- 33521- 335
64	Michael	Noble	noble@fresh-energy.org	Fresh Energy		408 Saint Peter St Ste 350 Saint Paul MN, 55102 United States	Electronic Service		No	21- 33521- 335

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65	Rolf	Nordstrom	rnordstrom@gpisd.net	Great Plains Institute		2801 21ST AVE S STE 220 Minneapolis MN, 55407- 1229 United States	Electronic Service		No	21- 33521- 335
66	Christopher J.	Oppitz		-		PO Box 910 Park Rapids MN, 56470- 0910 United States	Paper Service		No	21- 33521- 335
67	Elanne	Palcich	epalcich@cpinternet.com	Save Our Sky Blue Waters		P.O. Box 3661 Duluth MN, 55803 United States	Electronic Service		No	21- 33521- 335
68	Max	Peters	maxp@cohasset-mn.com	City of Cohasset		305 NW First Ave Cohasset MN, 55721 United States	Electronic Service		No	21- 33521- 335
69	Jennifer	Peterson	jjpeterson@mnpower.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	21- 33521- 335
70	Marcia	Podratz	mpodratz@mnpower.com	Minnesota Power		30 W Superior S Duluth MN, 55802 United States	Electronic Service		No	21- 33521- 335
71	Tolaver	Rapp	tolaver.rapp@cliffsnr.com	Cliffs Natural Resources		200 Public Square Suite 3400 Cleveland OH, 44114-2318 United States	Electronic Service		No	21- 33521- 335
72	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	21- 33521- 335
73	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	21- 33521- 335
74	Ralph	Riberich	rriberich@uss.com	United States Steel Corp		600 Grant St Ste 2028 Pittsburgh PA, 15219 United States	Electronic Service		No	21- 33521- 335
75	Buddy	Robinson	buddy@citizensfed.org	Minnesota Citizens Federation NE		2110 W. 1st Street Duluth MN, 55806 United States	Electronic Service		No	21- 33521- 335
76	Santi	Romani		United Taconite		PO Box 180 Eveleth MN, 55734 United States	Paper Service		No	21- 33521- 335
77	Susan	Romans	sromans@allete.com	Minnesota Power		30 West Superior Street Legal Dept Duulth MN, 55802 United States	Electronic Service		No	21- 33521- 335

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
78	Peter	Scholtz	peter.scholtz@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	Suite 1400 445 Minnesota Street St. Paul MN, 55101-2131 United States	Electronic Service		No	21- 33521- 335
79	Robert H.	Schulte	rhs@schulteassociates.com	Schulte Associates LLC		1742 Patriot Rd Northfield MN, 55057 United States	Electronic Service		No	21- 33521- 335
80	Will	Seuffert	will.seuffert@state.mn.us		Public Utilities Commission	121 7th PI E Ste 350 Saint Paul MN, 55101 United States	Electronic Service		Yes	21- 33521- 335
81	Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates		7400 Lyndale Ave S Ste 190 Richfield MN, 55423 United States	Electronic Service		No	21- 33521- 335
82	Doug	Shoemaker	dougs@charter.net	Minnesota Renewable Energy		2928 5th Ave S Minneapolis MN, 55408 United States	Electronic Service		No	21- 33521- 335
83	Brett	Skyles	brett.skyles@co.itasca.mn.us	Itasca County		123 NE Fourth Street Grand Rapids MN, 55744- 2600 United States	Electronic Service		No	21- 33521- 335
84	Richard	Staffon	rcstaffon@msn.com	W. J. McCabe Chapter, Izaak Walton League of America		1405 Lawrence Road Cloquet MN, 55720 United States	Electronic Service		No	21- 33521- 335
85	James M	Strommen	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered		150 S 5th St Ste 700 Minneapolis MN, 55402 United States	Electronic Service		No	21- 33521- 335
86	Eric	Swanson	eswanson@winthrop.com	Winthrop & Weinstine		225 S 6th St Ste 3500 Capella Tower Minneapolis MN, 55402- 4629 United States	Electronic Service		No	21- 33521- 335
87	Robert	Tammen	bobtammen@frontiernet.net			PO Box 398 Soudan MN, 55782 United States	Electronic Service		No	21- 33521- 335
88	Jim	Tieberg	jtieberg@polymetmining.com	PolyMet Mining, Inc.		PO Box 475 County Highway 666 Hoyt Lakes MN, 55750 United States	Electronic Service		No	21- 33521- 335
89	Claire	Vatalaro	cvatalaro@allete.com	Allete		30 W Superior St Duluth MN, 55802 United States	Electronic Service		No	21- 33521- 335
90	Kodi	Verhalen	kverhalen@taftlaw.com	Taft Stettinius & Hollister LLP		80 S 8th St Ste 2200 Minneapolis MN, 55402 United States	Electronic Service		No	21- 33521- 335

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
91	Kevin	Walli	kwalli@fryberger.com	Fryberger, Buchanan, Smith & Frederick		380 St. Peter St Ste 710 St. Paul MN, 55102 United States	Electronic Service		No	21- 33521- 335
92	Laurie	Williams	laurie.williams@sierraclub.org	Sierra Club		Environmental Law Program 1536 Wynkoop St Ste 200 Denver CO, 80202 United States	Electronic Service		No	21- 33521- 335
93	Scott	Zahorik	scott.zahorik@aeoa.org	Arrowhead Economic Opportunity Agency		702 S. 3rd Avenue Virginia MN, 55792 United States	Electronic Service		No	21- 33521- 335