

January 31, 2025

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

RE: Comments of the Minnesota Department of Commerce
Docket No. PT7151/CN-24-435

Dear Mr. Seuffert:

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

Amazon Data Services, Inc.'s Petition for an Exemption from Certificate of Need Requirements for Emergency Backup Generators at Becker, Minnesota.

The Petition was filed by Amazon Data Services, Inc. on December 27, 2024.

The Department recommends the Commission **determine that a certificate of need is required and grant the exemptions** and is available to answer any questions the Minnesota Public Utilities Commission may have.

Sincerely,

/s/ Sydnie Lieb, Ph.D.
Assistant Commissioner, Department of Regulatory Affairs

SR/ar
Attachment



Before the Minnesota Public Utilities Commission

Comments of the Minnesota Department of Commerce

Docket No. PT7151/CN-24-435

I. INTRODUCTION

Amazon Data Services, Inc. (ADS) is proposing to construct a data center in Becker, Minnesota. The data center is expected to have a peak daily load requirement of up to 600 megawatts (MW), which will be supplied by power purchased from Northern States Power Company d/b/a Xcel Energy (Xcel). ADS states that data centers must have reliable, on-demand backup power in the event of potential service disruptions. This generation must be able to deliver power within 10 seconds of power loss and be able to generate up to 600 MW under all weather conditions.

ADS is proposing to supply this backup power from approximately 250 generators ranging in size from 250 kilowatts (kW) to 2.75 MW. ADS states that the generators will provide power solely to ADS's data center and will operate only when power from Xcel's system is interrupted and for routine testing and maintenance. The generators will be electrically isolated from Xcel's system, meaning power will not flow from the generators onto the distribution or transmission systems. The emergency backup generators will be fueled by diesel and will not require the construction of any interconnection facilities, transmission lines, or transmission network upgrades.

II. PROCEDURAL BACKGROUND

December 27, 2024	ADS filed a petition ¹ requesting that the Minnesota Public Utilities Commission (Commission): (1) determine that a certificate of need (CN) is not required for ADS's emergency backup generators or (2) in the alternative, grant ADS exemptions from certain CN application data requirements pursuant to Minn. R. 7849.0200, subp. 6.
January 3, 2025	The Commission issued its <i>Notice of Comment Period</i> (Notice) for the Exemption Petition.

¹ *In the Matter of a Petition for an Exemption from Certificate of Need Requirements for Emergency Backup Generators at Becker, MN, Amazon Data Services, Inc., Petition, December 27, 2024, Docket No. PT7151/CN-24-435, (eDockets) [202412-213305-01](#). (hereinafter "Exemption Petition").*

Under the Notice the following topics are open for comment:

- Is a CN required for ADS's proposed data center and backup generators under Minnesota Statutes Chapter 216B?
- If it is determined a CN is required, should the Commission approve the exemptions to the CN application content requirements requested by ADS?
- Are there any additional issues or concerns related to this matter?

Below are the Comments of the Minnesota Department of Commerce (Department) regarding the issues specified in the Notice.

III. DEPARTMENT ANALYSIS

A. CN REQUIREMENT REQUEST

Under the Notice the first topic open for comment regards: is a CN required for ADS's proposed data center and backup generators under Minnesota Statutes Chapter 216B?

ADS requests that the Commission conclude that ADS's proposed emergency backup generators are exempt from CN requirements because the total size of the planned facility, net of in-plant use, does not exceed the statutory 50 MW threshold for large energy facilities. ADS subtracts the data center's demand from the generators capacity to reach the conclusion that the total size of the planned facility does not exceed the statutory 50 MW threshold.²

Minn. Stat. § 216B.243, subd. 2 states that "[n]o large energy facility shall be sited or constructed in Minnesota without the issuance of a certificate of need by the commission." In turn, Minn. Stat. § 216B.2421, subd. 2 (1) defines a large energy facility as "any electric power generating plant or combination of plants at a single site with a combined capacity of 50,000 kilowatts or more and transmission lines directly associated with the plant that are necessary to interconnect the plant to the transmission system."

Minnesota Rules chapter 7849 provides the scope and applicability of the Commission's CN requirements. Minn. R. 7849.0030, subp. 1, states:

A certificate of need is required for a new LEGF, a new LHVTL, and for expansion of either facility when the expansion is itself of sufficient size to come within the definition of "large electric generating facility" or "large high voltage transmission line" in part 7849.0010. The nominal generating

² Exemption Petition at 9.

capability of an LEGF is considered its size. If the nominal generating capability of an LEGF varies by season, the higher of the two seasonal figures is considered its size.

In turn, Minnesota Rules 7849.0010, subp. 20, defines nominal generating capability as “the average output power level, net of in-plant use, that a proposed LEGF is expected to be capable of maintaining over a period of four continuous hours of operation.” The phrase “net of in-plant use” is not defined in Minnesota Rules chapter 7849.

To argue that a CN is not required ADS relies upon a 1993 Commission decision regarding the addition of two diesel generators to Northern States Power Company’s Prairie Island Nuclear Generating Plant.^{3,4} The NSP Order stated the following:

Applying these rules⁵ to the particular set of facts now before the Commission, the Commission finds that the implementation of the diesel emergency generators does not require a certificate of need proceeding. In this case, the addition to the large electrical generating facility (Prairie Island) is in the form of two emergency diesel generators. These generators will be a backup to the existing emergency diesel generators. The new generators will not be connected to the transmission grid for the purpose of generating power. Rather, they will supply an alternative source of ac power in the case of one particular event, an SBO [station black out]. This alternative power source would be used within the plant to cool the nuclear reactor core until the plant's normal in-plant power source was restored. The diesel generators are not therefore expected to be capable of maintaining any output power level, net of in-plant use, for any period of time. Pursuant to the relevant Minnesota rules, this particular proposed addition to Prairie Island's nuclear power plant, for the particular emergency use proposed by the Company, is not an expansion to the plant for which a certificate of need proceeding is necessary.⁶

In essence, the Commission determined that the “output power level, net of in-plant use” would be zero because the generators were only designed to serve the load of the power plant itself and would not serve retail load. ADS’s claim is that their diesel generators would also have an “output power

³ *In the Matter of the Petition of Northern States Power Company for an Exemption from Certificate of Need Requirements*, Commission, Order, January 11, 1993, Docket No. E002/M-92-246, (eDockets) [323181](#). (hereinafter “NSP Order”).

⁴ Note that the diesel generators under discussion in the NSP Order would no longer require a CN. Nonetheless, the Department agrees with ADS that the principles in that case are instructive.

⁵ The Commission is referring to Minnesota Rules 7849.0030 and 7849.0010 subp. 20.

⁶ NSP Order at 5.

level, net of in-plant use” equal to zero because their diesel generators output can be netted against the retail load behind the same substation.

The Department concludes that the phrase “net of in-plant use” in Minnesota Rules 7849.0010, subp. 20 does not refer to retail load, even retail load at the same location. Instead, the phrase “net of in-plant use” refers to electricity used by the power plant itself; hence the term “in-plant.” This interpretation is consistent with the Commission’s prior decision, which specifically noted that its application of the rules was “to the particular set of facts now before the Commission.” Those facts included that the emergency diesel generators at issue “would be used within the plant to cool the nuclear reactor core.” Thus, it was correct for the Commission to reduce the average output power of the emergency diesel generators by Prairie Island’s in-plant use and arrive at the conclusion that, for CN purposes, the emergency diesel generators’ average power output was zero.

This matter presents a different set of facts. Here, the backup diesel generators would provide power to a data center which, unlike Prairie Island, is not a power plant. To extend the rationale from the prior decision to ADS’s facility would require expanding the definition of “in-plant use” beyond what is commonly understood (i.e. the power plant’s own consumption) to any load at the same site, whether or not the load is necessary to operate the power plant. Use of ADS’s definition could allow a power plant of any type and any installed capacity to be built without Commission approval as long as it is behind the meter, no larger than the other load at the same meter, and operates at the same level as the load.

The Department’s interpretation of “net of in-plant use” is supported by the statutory definition of “Large energy facility.” Pursuant to Minn. Stat. § 216B.2421, subd. 2(1), a “Large energy facility” includes “any electric power generating plant or combination of plants at a single site with a combined capacity of 50,000 kilowatts or more.” This definition makes clear that a site can contain multiple plants, and therefore “site” and “plant” are not synonymous. Rather, the plant is the portion, or portions, of the site that actually generates power. Accordingly, “net of in-plant use” should not be interpreted to mean “net of on-site use” if the entire site is not a power plant. Here, the backup diesel generators are the plant; the data center would be at the same site but not part of the plant.

In summary, ADS’s argument is based upon an invalid interpretation of “in-plant use.” The Department therefore recommends that the Commission determine that the backup diesel generators meet the definition of large energy generating facility and require a CN.

B. DATA EXEMPTION REQUEST

Under the Notice the second topic open for comment is: if it is determined a CN is required, should the Commission approve the exemptions to the CN application content requirements requested by ADS?

If the Commission finds that ADS is required to obtain a CN, ADS requests the Commission grant exemptions from various CN application data requirements because the information is not applicable to a need determination for behind-the-meter, backup generation. Specifically, ADS requests exemptions from the following data requirements:

- 7849.0240, subp. 2(B): Promotional Activities;
- 7849.0250 (C)(7): Effect of Project on Rates Systemwide;
- 7849.0250 (D): Map of Applicant’s System;
- 7849.0270: Peak Demand and Annual Consumption Forecast;
- 7849.0280: System Capacity;
- 7849.0290: Conservation Programs;
- 7849.0300: Consequences of Delay; and
- 7849.0340: The Alternative of No Facility.

The Department notes that these exemption requests are similar to those granted several times in the past to independent power producers proposing merchant power plants.⁷

B.1. Promotional Activities

Minnesota Rules part 7849.0240, subp. 2 (B) requires an applicant to provide “an explanation of the relationship of the proposed facility to [...] promotional activities that may have given rise to the demand for the facility.” The Exemption Petition states that “[b]ackup generation is required when electricity is not available from the utility system, thus there are no promotional activities which would give rise to need for backup generation.”⁸

The Department agrees with ADS’s justification and recommends that the Commission grant the proposed exemption to Minnesota Rules part 7849.0240, subpart 2 (B).

B.2. Effect of Project on Rates Systemwide

Minnesota Rules part 7849.0250 (C) (7) requires an applicant to estimate its proposed project’s “effect on rates systemwide and in Minnesota, assuming a test year beginning with the proposed in-service date.” ADS requests an exemption from this requirement because ADS does not have a “system” as defined by Minnesota Rules and it is not a utility with retail rates for the power it plans to generate. In addition, ADS will be solely responsible for costs related to the generators.

The Department agrees with ADS’ analysis and recommends that the Commission grant the proposed exemption to Minnesota Rules part 7849.0250 (C) (7).

⁷ For a few examples see Docket Nos. IP7096/CN-22-56, IP7070/CN-21-791, and IP7053/CN-21-112.

⁸ Exemption Petition at 11.

B.3. Map of Applicant's System

Minnesota Rules part 7849.0250 (D) requires an applicant to include a map showing the applicant's system. ADS requests an exemption from this requirement because the information does not exist—ADS does not have a system. Instead, ADS proposes to submit a map showing the proposed site of the project and its location relative to the power grid.

The Department agrees with ADS's analysis and recommends that the Commission grant the proposed exemption to Minnesota Rules part 7849.0250 (D) with the provision of the proposed alternative data.

B.4. Peak Demand and Annual Consumption Forecast

Minnesota Rules part 7849.0270 requires an applicant to provide detailed peak demand and energy consumption forecasts to justify the need for a proposed project. The Exemption Petition states that:

ADS does not have a "service area" or "system" and, as such, the requested data are inapplicable. Moreover, ADS's data center will be the sole consumer of power from the backup generation. As such, ADS proposes to provide information regarding the data center's peak demand and annual electrical consumption.⁹

The Department agrees with ADS's analysis and recommends that the Commission grant the proposed exemption to Minnesota Rules part 7849.0270 with the provision of the proposed alternative data.

B.5. System Capacity

Under Minnesota Rules part 7849.0280, an applicant must provide information that describes the ability of its existing system to meet forecasted demand; in essence, load and capability information. Again, ADS does not have a "system" as defined by Minnesota Rules. In addition, ADS states:

Power from the backup generation will be used exclusively to serve the data center load when and if power is unavailable from the utility provider. The backup generation will not be grid connected. Accordingly, it is not available to meet the broader demand for electricity that may exist on the utility's system.¹⁰

The Department agrees with ADS's analysis and recommends that the Commission grant the proposed exemption to Minnesota Rules part 7849.0280.

⁹ Exemption Petition at 12.

¹⁰ Exemption Petition at 12-13.

B.6. Conservation Programs

Minnesota Rules part 7849.0290 requires an applicant to provide conservation program information and quantification of the impact of conservation programs on forecast data. ADS is not a regulated utility, has no retail customers, and will utilize the power from the backup generation exclusively to serve its data center when power is unavailable from Xcel. Therefore, conservation programs could not serve as an alternative to the project. Thus, ADS requests an exemption from Minnesota Rules part 7849.0290 in its entirety.

The Department agrees with ADS's analysis and recommends that the Commission grant the proposed exemption to Minnesota Rules part 7849.0290.

B.7. Consequences of Delay

Minnesota Rules part 7849.0300 requires an applicant provide detailed information regarding the consequences of delay to its system, neighboring systems, and the power pool at three specific, statistically-based levels of demand and energy consumption. The Exemption Petition states that:

ADS is not a utility and has no "system" as defined by the Rules. Moreover, the generators will not be connected to any system, neighboring system or power pools. Thus, this data requirement is inapplicable to ADS.¹¹

The Department agrees with ADS's analysis and recommends that the Commission grant the proposed exemption to Minnesota Rules part 7849.0300.

B.8. The Alternative of No Facility

Minnesota Rules part 7849.0340 requires an applicant discuss the impact on existing generation and transmission facilities at the three levels of demand specified in Minnesota Rules part 7849.0300 for the no-build alternative. Again, ADS does not have a "system," nor does it have other generation and transmission facilities in Minnesota.

ADS's back-up generators will not impact any other generation and transmission facilities since the generators will only be used to provide on-site, back-up power. Therefore, the Department recommends that the Commission grant the proposed exemption to Minnesota Rules part 7849.0340.

¹¹ Exemption Petition at 13.

C. OTHER ISSUES

Under the Notice the third topic open for comment is: are there any additional issues or concerns related to this matter?

The Department has no other issues or concerns.

IV. DEPARTMENT RECOMMENDATIONS

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

A. CN REQUIREMENT REQUEST

- The Department recommends the Commission determine that a CN is required in this instance.

B. DATA EXEMPTION REQUEST

- B.1. The Department recommends that the Commission grant the proposed exemption to Minnesota Rules part 7849.0240, subpart 2 (B).
- B.2. The Department recommends that the Commission grant the proposed exemption to Minnesota Rules part 7849.0250 (C) (7).
- B.3. The Department recommends that the Commission grant the proposed exemption to Minnesota Rules part 7849.0250 (D) with the provision of the proposed alternative data.
- B.4. The Department agrees recommends that the Commission grant the proposed exemption to Minnesota Rules part 7849.0270 with the provision of the proposed alternative data.
- B.5. The Department recommends that the Commission grant the proposed exemption to Minnesota Rules part 7849.0280.
- B.6. The Department recommends that the Commission grant the proposed exemption to Minnesota Rules part 7849.0290.
- B.7. The Department recommends that the Commission grant the proposed exemption to Minnesota Rules part 7849.0300.
- B.8. The Department recommends that the Commission grant the proposed exemption to Minnesota Rules part 7849.0340.

CERTIFICATE OF SERVICE

I, Sharon Ferguson, hereby certify that I have this day, served copies of the following document on the attached list of persons 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
Comments

Docket No. PT7151/CN-24-435

Dated this **31st** day of **January 2025**

/s/Sharon Ferguson

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
1	David	Bell	david.bell@state.mn.us		Department of Health	POB 64975 St. Paul MN, 55164 United States	Electronic Service		No	CN-24-435
2	Christina	Brusven	cbrusven@fredlaw.com	Fredrikson Byron		60 S 6th St Ste 1500 Minneapolis MN, 55402-4400 United States	Electronic Service		No	CN-24-435
3	Generic	Commerce Attorneys	commerce.attorneys@ag.state.mn.us		Office of the Attorney General - Department of Commerce	445 Minnesota Street Suite 1400 St. Paul MN, 55101 United States	Electronic Service		Yes	CN-24-435
4	Water Programs	Coordinator	waterprograms.bwsr@state.mn.us		Minnesota Board of Water and Soil Resources	520 Lafayette Road N St. Paul MN, 55155 United States	Electronic Service		No	CN-24-435
5	Randall	Doneen	randall.doneen@state.mn.us		Department of Natural Resources	500 Lafayette Rd, PO Box 25 Saint Paul MN, 55155 United States	Electronic Service		No	CN-24-435
6	Kate	Fairman	kate.fairman@state.mn.us		Department of Natural Resources	Box 32 500 Lafayette Rd St. Paul MN, 55155-4032 United States	Electronic Service		No	CN-24-435
7	Annie	Felix Gerth	annie.felix-gerth@state.mn.us			Board of Water & Soil Resources 520 Lafayette Rd Saint Paul MN, 55155 United States	Electronic Service		No	CN-24-435
8	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	CN-24-435
9	Chris	Green	chris.green@state.mn.us	Minnesota Pollution Control Agency		504 Fairgrounds Rd Suite 200 Marshall MN, 56258 United States	Electronic Service		No	CN-24-435
10	Todd	Green	todd.a.green@state.mn.us		Minnesota Department of Labor & Industry	443 Lafayette Rd N St. Paul MN, 55155-4341 United States	Electronic Service		No	CN-24-435
11	Kari	Howe	kari.howe@state.mn.us		DEED	332 Minnesota St, #E200 1ST National Bank Bldg St. Paul MN, 55101 United States	Electronic Service		No	CN-24-435
12	Raymond	Kirsch	raymond.kirsch@state.mn.us		Department of Commerce	85 7th Place E Ste 500 St. Paul MN, 55101 United States	Electronic Service		No	CN-24-435
13	Chad	Konickson	chad.konickson@usace.army.mil	U.S.Army Corps of		332 Minnesota St.	Electronic Service		No	CN-24-435

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
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14	Stacy	Kotch Egstad	stacy.kotch@state.mn.us		MINNESOTA DEPARTMENT OF TRANSPORTATION	395 John Ireland Blvd. St. Paul MN, 55155 United States	Electronic Service		No	CN-24- 435
15	Dawn S	Marsh	dawn_marsh@fws.gov	U.S. Fish & Wildlife Service		Minnesota- Wisconsin Field Offices 4101 American Blvd E Bloomington MN, 55425 United States	Electronic Service		No	CN-24- 435
16	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	CN-24- 435
17	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	CN-24- 435
18	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	CN-24- 435
19	Ryan	Shrout	shroutr@amazon.com	Amazon Data Services, Inc.		410 Terry Avenue North Seattle WA, 98109 United States	Electronic Service		No	CN-24- 435
20	Aaron	Toro	aatoro@amazon.com	Amazon Data Services, Inc.		410 Terry Avenue North Seattle WA, 98109 United States	Electronic Service		No	CN-24- 435
21	Jayme	Trusty	execdir@swrdc.org	SWRDC		2401 Broadway Ave #1 Slayton MN, 56172 United States	Electronic Service		No	CN-24- 435
22	Jen	Tyler	tyler.jennifer@epa.gov	US Environmental Protection Agency		Environmental Planning & Evaluation Unit 77 W Jackson Blvd. Mailstop B-19J Chicago IL, 60604-3590 United States	Electronic Service		No	CN-24- 435
23	Cynthia	Warzecha	cynthia.warzecha@state.mn.us	Minnesota Department of Natural Resources		500 Lafayette Road Box 25 St. Paul MN, 55155-4040 United States	Electronic Service		No	CN-24- 435
24	Isaac	Weston	isaac.weston@state.mn.us			null null, null United States	Electronic Service		No	CN-24- 435
25	Alan	Whipple	sa.property@state.mn.us		Minnesota Department Of Revenue	Property Tax Division 600 N. Robert Street	Electronic Service		No	CN-24- 435

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						St. Paul MN, 55146-3340 United States				
26	Jonathan	Wolfgram	jonathan.wolfgram@state.mn.us		Office of Pipeline Safety	445 Minnesota St Ste 147 Woodbury MN, 55125 United States	Electronic Service		No	CN-24-435

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2	Water Programs	Coordinator	waterprograms.bwsr@state.mn.us		Minnesota Board of Water and Soil Resources	520 Lafayette Road N St. Paul MN, 55155 United States	Electronic Service		No	CN - CERTIFICATE OF NEEDS
3	Randall	Doneen	randall.doneen@state.mn.us		Department of Natural Resources	500 Lafayette Rd, PO Box 25 Saint Paul MN, 55155 United States	Electronic Service		No	CN - CERTIFICATE OF NEEDS
4	Kate	Fairman	kate.fairman@state.mn.us		Department of Natural Resources	Box 32 500 Lafayette Rd St. Paul MN, 55155-4032 United States	Electronic Service		No	CN - CERTIFICATE OF NEEDS
5	Annie	Felix Gerth	annie.felix-gerth@state.mn.us			Board of Water & Soil Resources 520 Lafayette Rd Saint Paul MN, 55155 United States	Electronic Service		No	CN - CERTIFICATE OF NEEDS
6	Todd	Green	todd.a.green@state.mn.us		Minnesota Department of Labor & Industry	443 Lafayette Rd N St. Paul MN, 55155-4341 United States	Electronic Service		No	CN - CERTIFICATE OF NEEDS
7	Kari	Howe	kari.howe@state.mn.us		DEED	332 Minnesota St, #E200 1ST National Bank Bldg St. Paul MN, 55101 United States	Electronic Service		No	CN - CERTIFICATE OF NEEDS
8	Raymond	Kirsch	raymond.kirsch@state.mn.us		Department of Commerce	85 7th Place E Ste 500 St. Paul MN, 55101 United States	Electronic Service		No	CN - CERTIFICATE OF NEEDS
9	Chad	Konickson	chad.konickson@usace.army.mil	U.S. Army Corps of Engineers		332 Minnesota St. Suite E1500 Saint Paul MN, 55101 United States	Electronic Service		No	CN - CERTIFICATE OF NEEDS
10	Stacy	Kotch Egstad	stacy.kotch@state.mn.us		MINNESOTA DEPARTMENT OF TRANSPORTATION	395 John Ireland Blvd. St. Paul MN, 55155 United States	Electronic Service		No	CN - CERTIFICATE OF NEEDS
11	Dawn S	Marsh	dawn_marsh@fws.gov	U.S. Fish & Wildlife Service		Minnesota-Wisconsin Field Offices 4101 American Blvd E Bloomington MN, 55425 United States	Electronic Service		No	CN - CERTIFICATE OF NEEDS
12	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	CN - CERTIFICATE OF NEEDS

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13	Jayme	Trusty	execdir@swrdc.org	SWRDC		2401 Broadway Ave #1 Slayton MN, 56172 United States	Electronic Service		No	CN - CERTIFICATE OF NEEDS
14	Jen	Tyler	tyler.jennifer@epa.gov	US Environmental Protection Agency		Environmental Planning & Evaluation Unit 77 W Jackson Blvd. Mailstop B-19J Chicago IL, 60604-3590 United States	Electronic Service		No	CN - CERTIFICATE OF NEEDS
15	Cynthia	Warzecha	cynthia.warzecha@state.mn.us	Minnesota Department of Natural Resources		500 Lafayette Road Box 25 St. Paul MN, 55155-4040 United States	Electronic Service		No	CN - CERTIFICATE OF NEEDS
16	Alan	Whipple	sa.property@state.mn.us		Minnesota Department Of Revenue	Property Tax Division 600 N. Robert Street St. Paul MN, 55146-3340 United States	Electronic Service		No	CN - CERTIFICATE OF NEEDS
17	Jonathan	Wolfgram	jonathan.wolfgram@state.mn.us		Office of Pipeline Safety	445 Minnesota St Ste 147 Woodbury MN, 55125 United States	Electronic Service		No	CN - CERTIFICATE OF NEEDS