

March 13, 2026

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

Re: In the Matter of Verified Formal Complaint of Hennepin County, Minnesota Against  
Xcel Energy Under Minn. Stat. § 216B.164  
Docket No. E002/C-25-435

Executive Secretary Bergman:

Please find the attached comments of Hennepin County, Minnesota in response to the Commission's January 13, 2026 Notice of Comment Period in the above matter. Thank you for your attention to this matter.

Sincerely,

*/s/ Todd J. Guerrero*

Todd J. Guerrero

**BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION**

121 7th Place East, Suite 350

St. Paul, MN 55101-2147

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In the Matter of Formal complaint of  
Hennepin County, Minnesota Against Xcel  
Energy Under Minn. Stat. 216B.164

MPUC Docket No. E-002/C-25-435

**COMMENTS OF  
HENNEPIN COUNTY, MINNESOTA**

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**INTRODUCTION**

On January 15, 2026, the Commission issued a Notice of Comment Period seeking comment on whether it should investigate Hennepin County’s December 23, 2025 Formal Complaint and Request for Relief against Xcel Energy. The Commission identified four topics for comment:

- Does the Commission have jurisdiction over the subject matter of the Complaint?
- Are there reasonable grounds for the Commission to investigate these allegations?
- Is it in the public interest for the Commission to investigate these allegations upon its own motion?
- If the Commission chooses to investigate the Complaint, what procedures should be used to do so?

By statute and Commission rules, the Commission has authority to investigate disputes involving public utilities and Minnesota’s net metering program, to administer and enforce the program and related tariffs, and to prevent unlawful or discriminatory practices. Because this dispute turns on net metering eligibility pursuant to Minn. Stat. § 216B.164, chapter 7835 of the Commission rules, and Xcel’s Commission-approved tariffs, the Commission has subject-matter jurisdiction to investigate the complaint and grant the County’s requested relief.

The Commission's investigation of these allegations serves the public interest by upholding state statutes, protecting ratepayers from unlawful and discriminatory practices, safeguarding ratepayer and taxpayer investments, and encouraging Minnesota's interest in distributed renewable energy consistent with legislative intent. The Commission should not hesitate to claim jurisdiction over the matter.

Importantly, Xcel bears the burden of proof to show its actions are consistent with the law and not unreasonable, discriminatory, or unduly prejudicial. Minn. Stat. §§ 216B.164 and 216B.17. Upon finding of jurisdiction, the Commission should serve the complaint on Xcel forthwith. Following Xcel's answer within twenty days of service,<sup>1</sup> the County proposes it be allowed to file an initial brief on the merits within fifteen days of Xcel's answer; followed by Xcel's reply within no more than fifteen days; and that the County then be given the opportunity to file a reply within seven days. The Department of Commerce, Office of Attorney General RUD, and other interested parties should be allowed to file comments in support of either party within twenty days of Xcel's reply brief so that the agencies and public have the benefit of the principal briefs on the merits.<sup>2</sup> Following written submissions, the Commission should hold a public hearing to hear the parties' arguments.<sup>3</sup> Because much of this dispute has already been briefed

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<sup>1</sup> Minn. R. pt. 7829.1800, subp. 2.

<sup>2</sup> Minn. R. pt. 7829.1900, subp. 3 indicates persons wishing to comment on formal complaints shall do so within 30 days "of the date of the commission order requiring an answer to the complaint." The County does not object to giving interested persons more time to file comments than contemplated by the rule, as allowing the Department and other interested persons the opportunity to review the County's and Xcel's briefs on the merits before submitting their own comments will allow for more informed comments, and thereby aid the Commission.

<sup>3</sup> Minn. Stat. § 216B.17, subd. 3.

in the earlier #24-389 Docket,<sup>4</sup> and because there are no factual issues in dispute, the Commission should expedite this proceeding in accordance with Minn. R. 7829.1200.

### DISCUSSION

#### **1. The Commission has jurisdiction over the subject matter of the complaint.**

The County's complaint alleges Xcel intends to effectively change the compensation owed the County under state law and Xcel's net-metering tariff by applying the Federal Energy Regulatory Commission's "one-mile rule," canceling the parties' Uniform Statewide Contracts, and offering lower, avoided-cost compensation instead. State law expressly grants the Commission jurisdiction to adjudicate a dispute raised under Minnesota's net-metering program Minn. Stat. § 216B.164, subd. 5(a).<sup>5</sup> *See also* Minn. R. 7835.4500.<sup>6</sup> Thus, this subject matter falls squarely within the Commission's jurisdiction.

Specifically, the issues central to the County's claims involve the application of Minnesota's cogeneration and small-power-production statute (Minn. Stat. § 216B.164) and the Commission's related rules (Minn. R. Ch. 7835), which govern eligibility and compensation for net-metered facilities and qualifying facilities.<sup>7</sup> The Commission's rules require utilities to

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<sup>4</sup> MPUC Docket No E-002/M-24-389.

<sup>5</sup> "In the event of disputes between a public utility and a qualifying facility, either party may request a determination of the issue by the commission."

<sup>6</sup> "In case of a dispute between a utility and a qualifying metering facility or an impasse in the negotiations between them, either party may request the commission to determine the issue."

<sup>7</sup> A small power production facility – such as the County's solar arrays – can be both a "qualifying facility" and "net metered facility" under state law. A qualifying facility under state law is simply a facility that satisfies the conditions established in Code of Federal Regulations, title 18, part 292 – i.e., (i) is under 80 MW, meets the fuel requirement, and is exempt from QF filing requirements because the facility is under 1 MW. A "net metered facility" is an electric generation facility constructed for the purpose of offsetting energy use through use of renewable energy or high-efficiency distributed generation sources. The County's solar arrays satisfy each definition.

purchase energy and capacity from eligible net-metered facilities at “the standard rates described in parts 7835.4012 to 7835.4015.” Minn. R. 7835.4011, 7835.1900. Xcel’s violation of these standards is at issue in the complaint, and within the Commission’s purview. The complaint seeks relief that the Commission is empowered to grant in net-metering disputes, including ordering recognition of the County’s solar arrays as eligible net metering facilities, directing compensation under the applicable rate codes, and awarding costs and fees pursuant to Minn. Stat. § 216B.164, subd. 5, and Minn. R. 7835.4550.

The Commission’s ratemaking and tariff-oversight authority also encompass Xcel’s conduct challenged by the complaint. Xcel is a “public utility” as defined in Minn. Stat. § 216B.02, subd. 4, and is therefore subject to the Commission’s regulatory authority. Minnesota law prohibits a public utility from changing a “rate” – a term that includes “rules, practices, or contracts affecting” compensation – without Commission approval or from charging compensation that differs from its filed schedules. Minn. Stat. §§ 216B.16; 216B.02, subd. 5; 216B.06). Additionally, rates must be just, reasonable, and non-discriminatory. Minn. Stat. §§ 216B.03, 216B.07. Because the complaint requests the Commission enforce these statutory requirements and Xcel’s NM tariff, the Commission has subject-matter jurisdiction on this independent ground.

**2. There are reasonable grounds for the Commission to investigate the County’s allegations.**

The complaint presents credible, documented allegations that Xcel intends to apply the federal one-mile rule to aggregate the capacities of distinct, separate net metered facilities, thereby excluding them from net-metering eligibility despite the Commission’s prior clarification on this matter to the contrary. In Docket E-002/M-24-389, the Commission noted that its “June

2025 Order did not adopt or take any action related to the ‘one-mile rule’ for purposes of determining net metering eligibility.”<sup>8</sup> Nonetheless, Xcel intends to apply the federal rule, stating “[o]ur position that the FERC one-mile rule applies was developed and communicated to Hennepin County before the Commission made its rulings in the 24-389 docket.” See, Compl., Att. 6. Xcel expressly reaffirmed that it would apply the one-mile rule to aggregate the County’s arrays, stating “[w]e stand by the substance of our prior written communications on this.” See, *id.*<sup>9</sup> Xcel’s stated intent to cancel Uniform Statewide Contracts and compensate only at avoided cost demonstrates an immediate, system-wide risk of confusion and noncompliance that requires the Commission’s intervention.

The allegations also point to a clear conflict between Xcel’s conduct and the governing statutory and regulatory framework that defines net metering eligibility. Minnesota law and Commission rules measure facility capacity at the point of interconnection or common coupling, defined as “the point where the distributed generation facility is connected to the utility’s electric power grid.” Minn. R. § 7835.0100, subps. 4; 17a. Likewise, Xcel’s NM Tariff (Section 9) and customer contracts define capacity as “at the point of common coupling between a QF or NMF and a utility’s electric system.” Minnesota Electric Rate Book – MPUC No. 2, Section No. 9, 2<sup>nd</sup> Revised at Sheet No. 1 (emphasis added). Xcel’s NM Tariff requires it to measure “the total capacity of all of the customer’s systems *which are on the same set of aggregated meters.*”

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<sup>8</sup> *In the Matter of the Petition of Northern States Power Co. d/b/a Xcel Energy to Revise Its Net Metering Tariffs to Apply to Qualifying Facilities Up to 5 MW*, Docket No. E002/M-24-389, Order Denying Reconsideration (Sept. 11, 2025).

<sup>9</sup> In the same email included as Attachment 6 to the complaint, Xcel also pointed out the Commission itself noted in reconsideration deliberations that the “County could file a complaint with the Commission . . .” and that Xcel “believe[s] that this would be the most civil way to proceed here.”

Minnesota Electric Rate Book – MPUC No. 2, Section No. 9, 2<sup>nd</sup> Revised at Sheet No. 1, ¶ 3, INDIVIDUAL SYSTEM CAPACITY LIMITS (emphasis added). Here, the County’s arrays are separately metered, have distinct interconnection points, and are not aggregated. Yet Xcel proposes to combine the arrays’ capacities using the one-mile rule. Xcel’s position is unsupported by law as neither the legislature nor the Commission has adopted the one-mile rule to determine net metering eligibility.

In sum, there are more than sufficient grounds for the Commission to investigate the allegations in the complaint to ensure Xcel’s compliance with Commission-approved tariffs, and to prevent systemic practices contrary to Minnesota law.

**3. The public interest requires that the Commission investigate these allegations, whether in response to the County’s complaint or upon its own motion.**

The legislature has made it clear that Minnesota’s net-metering law “shall at all times be construed in accordance with its intent to give the maximum possible encouragement to cogeneration and small power production consistent with protection of the ratepayers and the public.” Minn. Stat. § 216B.164, subd. 1. This public-interest mandate places the promotion of distributed renewable generation at the center of the Commission’s responsibilities under Minn. Stat. § 216B.164. The legislature has further directed the Commission to “set rates to encourage energy conservation and renewable energy use,” with any doubt resolved in favor of customers. Minn. Stat. § 216B.03. Investigating whether Xcel’s conduct, as alleged in the complaint, unlawfully forecloses net-metering participation is therefore squarely aligned with the Commission’s statutory duty to protect the public interest and advance state energy policy.

If left unchecked, Xcel's conduct described in the complaint would discourage renewable energy development by government and corporate entities whose facilities are often sited near

one another and who otherwise neither need nor want to take advantage of the benefits that being a “qualified facility” provides under federal law. In this matter, the County’s solar arrays are 0.17 miles apart and would be forcibly aggregated under Xcel’s approach, foreclosing net metering even though each array independently meets the statutory eligibility for being a net-metered facility. Allowing Xcel to apply this approach to its other uniform statewide contracts would chill renewable energy investments by similarly-situated entities and undermine both the legislature’s explicit intent to encourage cogeneration and small power production and the Commission’s responsibility to foster renewable energy use for the benefit of ratepayers and the public. *See* Minn. Stat. § 216B.164, subd. 1; Minn. Stat. § 216B.03.

The complaint alleges concrete impacts to ratepayers and taxpayers the Commission is obligated to address. *See* Minn. Stat. § 216B.17, subd. 1. The County spent \$4.1 million of taxpayer money for the public safety headquarters’ (PSH) and adult correction facility’s (ACF) arrays in reliance on Xcel’s tariffed net-metering rates. For Xcel to replace those rates with lower, avoided-cost compensation not only harms taxpayers but also signals to other net-metered facility owners (and future owners) that Xcel may unilaterally revoke the statutorily mandated framework for net metering. Such an outcome would be at odds with just, reasonable, and non-discriminatory rates and risk inconsistent treatment among similarly-situated customers.

- 4. When investigating the complaint, the Commission should proceed by expedited proceedings, order Xcel to show cause in response to each complaint presented and permit the County to file initial and final briefs.**

This controversy turns on discrete questions of statutory interpretation raised in the complaint. There are no disputed facts. The County’s verified complaint, Xcel’s Uniform Statewide Contracts, and contemporaneous correspondence from Xcel make clear that the

material facts are established and undisputed: the PSH and ACF arrays are separately metered; each is individually rated between 40 kW and 1,000 kW; each array has distinct points of interconnection; each is served from different Xcel substations; and the County has not requested account aggregation; each array has separate Uniform Statewide Contracts, which Xcel signed. Despite these facts, Xcel intends to apply the federal one-mile rule to aggregate the capacities of these distinct, separately metered facilities; cancel the parties' contracts; and instead offer the County lower, avoided-cost compensation. Because there are no disputed facts, it is appropriate the Commission act expeditiously.

The Commission should determine that it has jurisdiction over this matter and that there are reasonable grounds to investigate the complaint without delay. See Minn. R. 7829.1800, subp. 1. The County requests that the Commission conclude it has jurisdiction, serve the complaint on Xcel, and require Xcel to file an answer within twenty days. See Minn. R. 7829.1800, subp. 2. Because Minnesota law places the burden of proof throughout this proceeding on Xcel to show that its proposed application of the one-mile rule is lawful, just, and reasonable, the Commission should require Xcel to show cause in answer to each count in the complaint why its position is lawful. See Minn. Stat. §§ 216B.16, subd. 4, and 216B.164.

a. Count I - Unlawful Restriction of Net Metering. The Commission should order Xcel to show cause as to why its intended application of FERC's one-mile rule — which would prevent the County's ACF and PSH arrays from participating in the state's net metering program — is not in violation of Minnesota law, specifically Minn. Stat. § 216B.164, subds. 1, 2a(j), and 3a(a), as well as Minn. R. 7835.1900, 7835.4011, and 7835.4014. FERC itself has stated

that state net metering programs are outside of its jurisdiction,<sup>10</sup> as has Xcel and the Department of Commerce<sup>11</sup> and neither the legislature nor the Commission has adopted the one-mile rule. Moreover, Xcel's intended actions contravene the legislature's instruction that the law "shall *at all times* be construed in accordance with its intent to give the maximum possible encouragement to cogeneration and small power production consistent with protection of the ratepayers and the public." See Minn Stat. § 216B.164, subd. 1, subd. 3a(a)(emphasis supplied); Minn. R. 7835.1900, 7835.4011, 7835.4014.

b. Count II – Illegal Ratemaking. The Commission should order Xcel to show cause as to why it has the authority under Minnesota law, Commission rules, and its own tariffs to apply the "one-mile rule" to aggregate the capacities of separately metered, distinct net metered facilities (specifically the PSH and ACF arrays), thereby restricting their net metering eligibility and denying them compensation at the standard rates described in parts 7835.4012 to 7835.4015 without Commission approval and in contravention of the statutory and regulatory definitions of "capacity" and "net metered facility" set forth under Minnesota law. See, e.g., Minn. Stat. §§ 216B.16, 216B.164, subd. 2a(c); Minn R. 7835.0100, subps. 4, 1, 7; Minn. R. 7835.1900; Minn. R. 7835.4011; and the Minnesota Electric Rate Book – MPUC No. 2, Section No. 9, 2nd Revised at Sheet No. 1.

c. Count III – Unreasonable, Prejudicial, and Discriminatory Practices. The Commission should further require Xcel to show cause why its application of the one-mile rule to

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<sup>10</sup> *Sun Edison LLC*, 129 FERC ¶ 61, 146 (2009).

<sup>11</sup> "[N]et metering is an incentive mechanism that is *outside the scope of PURPA*." Xcel Energy Petition, November 20, 2024, MPUC Docket 24-389, at 3 (emphasis supplied); Comments of the Department of Commerce, February 18, 2025, at 4; Xcel Energy Reply Comments, February 28, 2025, MPUC Docket 24-389, at 7.

deny the County the standard net metering compensation rates for multiple solar arrays — despite the County’s reliance on contractually agreed upon net metered rates and substantial investment — does not constitute an unreasonably prejudicial, discriminatory, and unlawful practice under Minnesota law. *See, e.g.*, Minn. Stat. §§ 216B.03, 216B.06, 216B.07, 216B.16, Subds. 1 and 3a(a), and Minn. R. 7835.4011. By depriving the County of benefits guaranteed to all eligible net metered facilities and offering compensation only at avoided cost rather than prescribed tariffed rates, Xcel’s purported actions are unreasonable, prejudicial and discriminatory.

d. Procedural Recommendations. Upon the Commission’s finding of jurisdiction, and after serving the complaint on Xcel forthwith pursuant to Minn. Stat. § 216.17, subd. 2, the County, as the complainant, should be allowed to file its initial brief on the merits. The County is prepared to do that promptly and needs no more than 15 days following Xcel’s answer. Xcel should then be given no more than 20 days to file its reply brief, with the County afforded an opportunity for reply within seven days of Xcel’s brief. The Department of Commerce, OAG RUD and other interested parties should also be given the opportunity to provide comments. The County proposes that they do so within 20 days of Xcel’s reply brief so that they have the benefit of the principal briefs on the merits. Following submission of all briefs/comments, the Commission should expeditiously hold a hearing.

### **CONCLUSION**

For the foregoing reasons, the County respectfully requests that the Commission find it has jurisdiction over the County’s complaint and promptly investigate this matter consistent with the County’s recommendations set forth herein.

Respectfully submitted,

Dated: March 13, 2026

**KUTAK ROCK LLP**

By: /s/ Todd J. Guerrero

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**HENNEPIN COUNTY, MINNESOTA**

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**CERTIFICATE OF SERVICE**

I, Trudy Paulson, hereby certify that on March 13, 2026, I e-filed in Docket No. E002/C25-435 the foregoing comments of Hennepin County, Minnesota in response to the Commission's January 13, 2026 Notice of Comment Period and served copies of the same upon all parties listed in the attached service list via electronic filing.

Dated: March 13, 2026

By: /s/ Trudy Paulson  
Trudy Paulson

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2	Matthew	Brodin	mbrodin@allete.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	C-25-435
3	Mike	Bull	mike.bull@state.mn.us		Public Utilities Commission	121 7th Place East, Suite 350 St. Paul MN, 55101 United States	Electronic Service		Yes	C-25-435
4	John	Coffman	john@johncoffman.net	AARP		871 Tuxedo Blvd. St, Louis MO, 63119-2044 United States	Electronic Service		No	C-25-435
5	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	C-25-435
6	George	Crocker	gwillc@nawo.org	North American Water Office		5093 Keats Avenue Lake Elmo MN, 55042 United States	Electronic Service		No	C-25-435
7	James	Denniston	james.r.denniston@xcelenergy.com	Xcel Energy Services, Inc.		414 Nicollet Mall, 401-8 Minneapolis MN, 55401 United States	Electronic Service		No	C-25-435
8	Christopher	Droske	christopher.droske@minneapolismn.gov	Northern States Power Company dba Xcel Energy-Elec		661 5th Ave N Minneapolis MN, 55405 United States	Electronic Service		No	C-25-435
9	John	Farrell	jfarrell@ilsr.org	Institute for Local Self-Reliance		2720 E. 22nd St Institute for Local Self-Reliance Minneapolis MN, 55406 United States	Electronic Service		No	C-25-435
10	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	C-25-435
11	Todd J.	Guerrero	todd.guerrero@kutakrock.com	Kutak Rock LLP		Suite 1750 220 South Sixth Street Minneapolis MN, 55402-1425 United States	Electronic Service		No	C-25-435
12	Adam	Heinen	aheinen@dakotaelectric.com	Dakota Electric Association		4300 220th St W Farmington MN, 55024 United States	Electronic Service		No	C-25-435
13	Michael	Hoppe	lu23@ibew23.org	Local Union 23, I.B.E.W.		445 Etna Street Ste. 61 St. Paul MN,	Electronic Service		No	C-25-435

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15	Alan	Jenkins	aj@jenkinsatlaw.com	Jenkins at Law		2950 Yellowtail Ave. Marathon FL, 33050 United States	Electronic Service		No	C-25- 435
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17	Sarah	Johnson Phillips	sjphillips@stoel.com	Stoel Rives LLP		33 South Sixth Street Suite 4200 Minneapolis MN, 55402 United States	Electronic Service		No	C-25- 435
18	Farid	Khosravi	farid.khosravi@akerman.com	Akerman LLP		999 Peachtree Street NE Suite 1700 Atlanta GA, 30309 United States	Electronic Service		No	C-25- 435
19	Kavita	Maini	kmains@wi.rr.com	KM Energy Consulting, LLC		961 N Lost Woods Rd Oconomowoc WI, 53066 United States	Electronic Service		No	C-25- 435
20	Christine	Marquis	regulatory.records@xcelenergy.com	Xcel Energy		414 Nicollet Mall MN1180-07- MCA Minneapolis MN, 55401 United States	Electronic Service		No	C-25- 435
21	Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP		33 South Sixth St Ste 4200 Minneapolis MN, 55402 United States	Electronic Service		No	C-25- 435
22	David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency		220 South Sixth Street Suite 1300 Minneapolis MN, 55402 United States	Electronic Service		No	C-25- 435
23	Carol A.	Overland	overland@legalelectric.org	Legalelectric - Overland Law Office		1110 West Avenue Red Wing MN, 55066 United States	Electronic Service		No	C-25- 435
24	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	C-25- 435
25	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	C-25- 435

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29	Joseph	Windler	jwindler@winthrop.com	Winthrop & Weinstine		225 South Sixth Street, Suite 3500 Minneapolis MN, 55402 United States	Electronic Service		No	C-25-435
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31	Patrick	Zomer	pzomer@cozen.com	Cozen O'Connor		150 S. 5th Street, #1200 Minneapolis MN, 55402 United States	Electronic Service		No	C-25-435