

BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

Katie J. Sieben
Hwikwon Ham
Valerie Means
Joseph K. Sullivan
John A. Tuma

Chair
Commissioner
Commissioner
Commissioner
Commissioner

In the Matter of the Application of Dairyland
Power Cooperative for a Route Permit for
the Beaver Creek 161-kV Transmission Line in
Fillmore County, Minnesota

SERVICE DATE: October 15, 2024

DOCKET NO. ET-3/TL-24-95

The above-entitled matter has been considered by the Commission and the following disposition made:

- 1. Accepted Dairyland Power Cooperative's route permit application as substantially complete.**
- 2. Declined to appoint an advisory task force at this time.**
- 3. Requested a full Administrative Law Judge's report with findings of fact, conclusions of law, and recommendations for the project's public hearing.**
- 4. The Commission delegated authority to the Executive Secretary to issue an authorization to the applicant to initiate consultation with the Minnesota State Historic Preservation Office (SHPO).**

This decision is issued by the Commission's consent calendar subcommittee, under a delegation of authority granted under Minn. Stat. § 216A.03, subd. 8 (a). Unless a party, a participant, or a Commissioner files an objection to this decision within ten days of receiving it, it will become the Order of the full Commission under Minn. Stat. § 216A.03, subd. 8 (b).

The Commission agrees with and adopts the recommendations of the Department of Commerce, which are attached and hereby incorporated into the Order.

BY ORDER OF THE COMMISSION



Will Seuffert
Executive Secretary



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September 19, 2024

Via eDockets

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

RE: EERA Comments and Recommendations on Application Completeness
Beaver Creek 161 kV Transmission Line Project
Docket No. ET3/TL-24-95

Dear Mr. Seuffert,

Department of Commerce, Energy Environmental Review and Analysis staff provides the attached comments and recommendations in the following matter:

In the Matter of the Application of Dairyland Power Cooperative for a Route Permit for the Beaver Creek 161 kV Transmission Line in Fillmore County, Minnesota

The route permit application was filed on August 26, 2024, by:

Bridget A. Duffus
Fredriksson & Byron, P.A.
60 South Sixth Street, Suite 1500
Minneapolis, MN 55402-4400

Staff recommends the Commission accept the route permit application as substantially complete; take no action on an advisory task force; and request a full Administrative Law Judge report with recommendations.

EERA staff is available to answer any questions the Commission may have.

Sincerely,

Larry B. Hartman

Larry B. Hartman
Environmental Review Manager
Energy Environmental Review and Analysis

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BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

ENERGY ENVIRONMENTAL REVIEW AND ANALYSIS COMMENTS AND RECOMMENDATIONS

BEAVER CREEK 161 kV TRANSMISSION LINE PROJECT DOCKET No. ET3/TL-24-95

Date: September 19, 2024

EERA Staff: Larry B. Hartman | 612-210-4810 | larry.hartman@state.mn.us

In the Matter of the Application of Dairyland Power Cooperative for a Route Permit for the Beaver Creek 161 kV Transmission Line in Fillmore County, Minnesota

Issues Addressed: These comments and recommendations address the completeness of the route permit application, the need for an advisory task force, and other issues or concerns related to this matter.

Documents Attached:

- (1) Table 1. Application Completeness Requirements
- (2) Table 2. Draft Permitting and Environmental Review Schedule
- (3) Project Overview Map

Additional documents and information can be found on eDockets: <https://www.edockets.state.mn.us/EFiling/search.jsp> (24-95) and on the Department of Commerce's website: <https://apps.commerce.state.mn.us/web/project/15707>.

To request this document in another format, such as large print or audio, call 651-539-1529. Persons with a hearing or speech impairment may call using their preferred telecommunications relay service.

Introduction and Background

On August 26, 2024, Dairyland Power Cooperative (“Dairyland” or “applicant”), filed a route permit application for the Beaver Creek 161 kilovolt (kV) Transmission Line Project (project).¹ The Minnesota portion of the project consists of approximately 3.5 miles of a new 161 kV single-circuit high voltage transmission line (HVTL) and associated facilities on a new right-of-way, adjacent to existing road right-of-way in York Township in Fillmore County.

On September 5, 2024, the Minnesota Public Utilities Commission (Commission) issued a notice soliciting comments on the completeness of the application, the presence of contested issues of fact, the need for an advisory task force, and other concerns related to this matter.²

Project Purpose

The applicant indicates that the proposed project was identified as part of the 2017 August West Area Midcontinent Independent System Operator (MISO) Generation Interconnection Study (Appendix B)³ as being needed to allow proposed generators studied in 2017 to interconnect to the transmission system, to mitigate negative impacts to the thermal and voltage performance of the regional transmission system and increase the capability of proposed generators in the future to connect to the transmission system.⁴

Project Description and Location

The Minnesota portion of Dairyland’s proposed Beaver Creek project includes approximately 3.5 miles of new 161 kV high voltage transmission line and associated facilities on a new right-of-way in York Township in Fillmore County in southern Minnesota. The new line is proposed to be located adjacent to existing road right-of-way (ROW).⁴

The proposed project will start at the intersection of the existing LQ8A Harmony to Beaver Creek transmission line at 171st Avenue and travel south parallel to 171st Avenue (traversing Sections 17, 18, 19, 20, 29, 30, 31 and 32 of York Township) and cross the Minnesota-Iowa border at the southern border of York Township (see attached project map).⁵

¹ Route Permit Application for the Beaver Creek 161 kV Transmission Line Project, Dairyland Power Cooperative, August 26, 2024, eDockets Numbers – Filing Letter [20248-209763-01](#); Application (Text) [20248-209763-02](#); Appendix A (Project Maps); [20248-209763-03](#); Appendix B (MISO DPP August West Area Study Phase 3 Final Report) [20248-209763-04](#); Appendix C (Agency and Tribal Correspondence) [20248-209763-05](#); Appendix D (Alternative Process Letter) [20248-209763-06](#); Appendix E (Property Owners Within or Adjacent to the Proposed Route) [20248-209763-07](#); Appendix F (Vegetation Management Plan) [20248-209763-08](#); Appendix G (Emissions Calculation Table) [20248-209763-09](#); Appendix H (Cultural Literature Review) [20248-209766-01](#); (Cultural Trade Secret) [20248-209766-02](#); Appendix I (IPaC and MnDNR NHI Response) [20248-209766-03](#); Appendix J (Unanticipated Discoveries Plan) [20248-209766-04](#) [hereinafter Application].

² Notice of Comment Period on Application Completeness, September 5, 2024, eDocket Number [20249-209999-01](#).

³ Application, Appendix B, eDocket Number [20248-209763-04](#).

⁴ Application, 1.4, p. 11

⁵ Id. P.12

From the Iowa-Minnesota border, the HVTL will continue in a westerly and southerly direction through Howard County, Iowa and terminate at a new proposed 161 kV switchyard to be constructed in Chester Township, Howard County, Iowa.⁶

Regulatory Process and Procedures

In Minnesota, no person may construct a high voltage transmission line without a route permit from the Commission.⁷ A high voltage transmission line is defined as a conductor of electric energy designed for and capable of operation at a voltage of 100 kV or more and greater than 1,500 feet in length.⁸ The proposed project will consist of approximately 3.5 miles of single-circuit 161 kV transmission line and therefore requires a route permit from the Commission.

Because the applicant's proposed transmission line is under 200 kV, the project is eligible to use the alternative review process prescribed by Minnesota Statute 216E.04.⁹ The applicant has indicated their intent to use the alternative review process by notice to the Commission on July 30, 2024.¹⁰

The proposed project will operate at a voltage greater than 100 kV but will have a length in Minnesota less than ten miles; accordingly, the project is not considered a large energy facility and does not require a certificate of need from the Commission.¹¹

Route Permit Application Acceptance

Route permit applications for high voltage transmission lines must provide specific information about a project including applicant information, route descriptions, and potential environmental impacts and mitigation measures.¹² Under the alternative review process, applicants must propose one route in their route permit application and discuss any other routes considered and rejected for the project.¹³

The Commission may accept an application as complete, reject an application and require additional information to be submitted, or accept an application as complete upon filing of supplemental information.¹⁴ The environmental review and permitting process begins on the date the Commission determines that a route permit application is complete.¹⁵ The Commission has six months (or nine months, with just cause) from the date of this determination to reach a route permit decision.¹⁶

⁶ Id. P.12

⁷ Minnesota Statute 216E.03.

⁸ Minnesota Statute 216E.01.

⁹ Minnesota Statute 216E.04, Subd. 2 (noting those projects that are eligible to proceed under an alternative permitting process).

¹⁰ Notice of Intent to File a Route Permit Application for the Beaver Creek Project Pursuant to the Alternative Permitting Process, July 30, 2024, eDockets Number [20247-209095-01](#).

¹¹ Minnesota Statute 216B.2421; Minnesota Statute 216B.243.

¹² Minnesota Rule 7850.3100.

¹³ Id.

¹⁴ Minnesota Rule 7850.3200.

¹⁵ Id.

¹⁶ Minnesota Rule 7850.3900.

Environmental Review

Route permit applications are subject to environmental review conducted by Department of Commerce, Energy Environmental Review and Analysis (EERA) staff.¹⁷ Projects proceeding under the alternative review process require the preparation of an environmental assessment (EA).¹⁸ An EA is a document which contains an overview of the resources affected by a proposed project and describes the potential human and environmental impacts and possible mitigation measures. An EA is the only state environmental review document required for route permit applications reviewed under the alternative permitting process.

EERA and Commission staff conduct public information and scoping meetings to inform the content of the EA.¹⁹ The Commissioner of the Department of Commerce issues the scope of the EA and may include alternative routes suggested during the scoping process if they would aid the Commission in making a permit decision.

Public Hearing

Route permit applications under the alternative review process require that a public hearing be held in the project area after the EA for the project has been completed and released.²⁰ The hearing is typically presided over by an administrative law judge (ALJ) from the Office of Administrative Hearings. The Commission may request that the ALJ provide solely a summary of public testimony. Alternately, the Commission may request that the ALJ provide a full report with findings of fact, conclusions of law, and recommendations regarding the project.

Advisory Task Force

The Commission may appoint an advisory task force to aid the environmental review process.²¹ An advisory task force must include representatives of local governmental units in the project area.²² A task force assists EERA staff with identifying impacts and mitigation measures to be evaluated in the EA. A task force expires upon issuance of the EA scoping decision.²³

The Commission is not required to appoint an advisory task force for every project. If the Commission does not appoint a task force, citizens may request that one be appointed.²⁴ If such a request is made, the Commission must determine at a subsequent meeting if a task force should be appointed or not. The decision whether to appoint an advisory task force does not need to be made at the time of application acceptance; however, it should be made as soon as practicable to ensure its charge can be completed prior to issuance of the EA scoping decision.

¹⁷ Minnesota Statute 216E.04, Subd. 5.

¹⁸ Id.

¹⁹ Minnesota Rule 7850.3700, subp. 2.

²⁰ Minnesota Rule 7850.3800.

²¹ Minnesota Statute 216E.08.

²² Id.

²³ Minnesota Rule 7850.2400.

²⁴ Id.

EERA Staff Analysis and Comments

EERA staff provides the following analysis and comments in response to the Commission's notice requesting comments on completeness and other issues related to the applicant's route permit application.

Application Completeness

EERA staff conferred with applicant regarding the proposed project and reviewed a draft route permit application. EERA staff believes that staff comments on the draft application have largely been addressed in the route permit application submitted to the Commission. Staff has evaluated the application against the application completeness requirements of Minnesota Rule 7850.3100, which refers to 7850.1900 with exceptions for proposing alternative routes (see Table 1). Staff finds that the application contains appropriate and complete information with respect to these requirements.

Advisory Task Force

In analyzing the need for an advisory task force for the project, EERA staff considered four characteristics: project size, project complexity, known or anticipated controversy, and sensitive resources.

- **Project Size.** The project consists of approximately 3.5 miles of single-circuit 161 kV transmission line, a relatively short distance. Transmission line structures for the project will range in height from 75 to 140 feet and span 300 to 1,000 feet between structures. The length, voltage, and size of the structures make this project smaller than many others in Minnesota.
- **Project Complexity.** The project itself is not complex. The project, as proposed, will follow or parallel existing road right of way.
- **Known or Anticipated Controversy.** To date, staff is unaware of any controversies regarding the project, and there have been no public comments filed on the record.
- **Sensitive Natural Resources.** There are no Minnesota Biological Survey sites or Native Plant Communities along the project route.²⁵ The proposed route and ROW do not cross any USFWS administered properties, MnDNR WMAs, or Important Bird Areas.²⁶ The Natural Heritage Review did not identify any state listed species within the project ROW.²⁷ Additionally, the Natural Heritage Review indicated the federally listed northern long eared bat (NLEB) could reasonably be present in forested and treed area surrounding the proposed route.²⁸ Dairyland will coordinate with the MnDNR regarding potential impacts to

²⁵ Application.6.6.5, p. 85

²⁶ Application, 6.6.5, p. 85.

²⁷ Id. P.88.

²⁸ Id, p.88.

state-listed rare and unique resources and USFWS, regarding potential impacts to federally listed rare and unique resources, as needed.²⁹

Based on the assessment of the above factors, EERA staff believes that an advisory task force is not warranted for the project at this time.

Contested Issues of Fact

Based on its review of the route permit application and the record to date, EERA staff has not identified any contested issues of fact. Staff is unaware of any issues or concerns associated with the application or project that require a contested casehearing.

Other Issues Related to This Matter

EERA staff recommends that the Commission request a full ALJ report for the project's public hearing. EERA staff believe that a full ALJ report with recommendations provides an unbiased, efficient, and transparent method to voice and resolve any issues that may emerge as the record is developed. Requiring a full ALJ report reduces the burden on staff and helps to ensure that the Commission has a robust record on which to base its decision. Additionally, a full ALJ report does not significantly lengthen the site permitting process. EERA staff has provided a hypothetical schedule for the permitting process, which includes a comparison of potential hearing work products and schedules – i.e., a summary of public testimony versus a full ALJ report with findings, conclusions, and recommendations (see Table 2).

EERA Staff Recommendations

EERA staff recommends that:

- The Commission accept the applicant's route permit application as substantially complete.
- The Commission not appoint an advisory task force.
- The Commission request a full ALJ report with findings of fact, conclusions of law, and recommendations for the project's public hearing.

²⁹ Id, p. 85.

Table 1. Application Completeness Requirements

Authority	Location in Application	EERA Staff Comments
<p>Minn. Stat. 216E.04, subd.2(3); Minn. R. 7850.2800, subp. 1(C) Alternative Review of Applications.</p> <p>Alternative Review is available for high-voltage transmission lines (HVTL's) between 100 and 200 kilovolts.</p>	2.2,3.1	
<p>Minn. R. 7850.1900, subp.2 Notice to PUC</p>	Appendix D	
<p>Minn. R. 7850.3100 Contents of Application (Alternative Review)</p> <p>The applicant shall include in the application the same information required in part 7850.1900, except the applicant need not propose any alternative sites or routes to the preferred site or route. If the applicant has rejected alternative sites or routes, the applicant shall in the application the identity of the rejected routes or sites and an explanation of the reasons for rejecting them.</p>	4.2	
<p>Minn. R. 7850.1900, subp.2 Route Permit for HVTL</p> <p>A. a statement of proposed ownership of the facility at the time of filing the application and after commercial operation;</p>	Section 3.5	Information is provided to satisfy this requirement. Dairyland will own the project.

Authority	Location in Application	EERA Staff Comments
B. the precise name of any person or organization to be initially named as permittee or permittees and the name of any other person to whom the permit may be transferred if transfer of the permit is contemplated;	1.3	Information is provided to satisfy this requirement. Dairyland is the proposed permittee for the project.
C. a proposed route for the project and any rejected alternative routes and an explanation of the reasons for rejecting them; ³⁰	Chapter 4	Information is provided to satisfy this requirement.
D. a description of the proposed high voltage transmission line and all associated facilities, including the size and type of the high voltage transmission line;	Chapter 3	Information is provided to satisfy this requirement.
E. the environmental information required under subpart 3;	See Minnesota Rule 7850.1900, Subpart 3 below.	
F. identification of land uses and environmental conditions along the proposed routes;	Chapter 6	Information is provided to satisfy this requirement.
G. the names of each owner whose property is within any of the proposed routes for the high voltage transmission line;	Appendix E	Information is provided to satisfy this requirement.
H. United States Geological Survey topographical maps or other maps acceptable to the Commission showing the entire length of the high voltage transmission line on all proposed routes;	Appendix A	Information is provided to satisfy this requirement.

³⁰ Minnesota Rule 7850.3100.

Authority	Location in Application	EERA Staff Comments
I. identification of existing utility and public rights-of-way along or parallel to the proposed routes that have the potential to share the right-of-way with the proposed line;	1.4, 3.1.1, Appendix A	Information is provided to satisfy this requirement.
J. the engineering and operational design concepts for the proposed high voltage transmission line, including information on the electric and magnetic fields of the transmission line;	6.3.4	Information is provided to satisfy this requirement.
K. cost analysis each route, including the costs of constructing, operation and maintaining the high voltage transmission line that are dependent on design and route;	3.3	Information is provided to satisfy this requirement.
L. a description of possible design options to accommodate expansion of the high voltage transmission line in the future;	3.2.8	Information is provided to satisfy this requirement.
M. the procedures and practices proposed for the acquisition and restoration of the right-of-way, construction, and maintenance of the high voltage transmission line;	5.1	Information is provided to satisfy this requirement.
N. a listing and brief description of federal, state, and local permits that may be required for the proposed high voltage transmission line; and	2.3 & Table 2.1	Information is provided to satisfy this requirement.
O. a copy of the Certificate of Need or the certified HVTL list containing the proposed high voltage transmission line or documentation that an application for a Certificate of Need has been submitted or is not required.	2.1	Information is provided to satisfy this requirement. No Certificate of Need is required for this project.

Authority	Location in Application	EERA Staff Comments
Minn. R. 7850.3100 Identification of rejected route alternatives and explanation for rejection,	4.2	Information is provided to satisfy this requirement.
Minn. R. 7850.1900, subp. 3 Environmental Information An applicant for a route permit shall include in the application the following environmental information for each proposed route to aid in the preparation of environmental review documents.		
A. a description of the environmental setting for each site or route;	6.1	Information is provided to satisfy this requirement.
B. a description of the effects of construction and operation of the facility on human settlement, including, but not limited to, public health and safety, displacement, noise, aesthetics, socioeconomic impacts, cultural values, recreation, and public services;	6.2	Information is provided to satisfy this requirement.
C. a description of the effects of the facility on land-based economies, including, but not limited to, agriculture, forestry, tourism, and mining;	6.4	Information is provided to satisfy this requirement.
D. a description of the effects of the facility on archaeological and historic resources;	Section 6.5	Information is provided to satisfy this requirement.
E. a description of the effects of the facility on the natural environment, including effects on air and water quality resources and flora and fauna;	6.3.5, 6.6.4, 6.6.5	Information is provided to satisfy this requirement.

Authority	Location in Application	EERA Staff Comments
F. a description of the effects of the facility on rare and unique natural resources;	Section 6.6.7	Information is provided to satisfy this requirement.
G. identification of human and natural environmental effects that cannot be avoided if the facility is approved at a specific site or route; and	Section 6.8	Information is provided to satisfy this requirement.
H. a description of measures that might be implemented to mitigate the potential human and environmental impacts identified in items A to G and the estimated costs of such mitigative measures.	6, Appendices F, I	Information is provided to satisfy this requirement.

Table 2. Draft Permitting Process Schedule

Approximate Date	Permitting Day	Permitting Process Step
August 2024	--	Application Submitted
September 2024	--	Comment Period on Application Completeness
September / October 2024	--	Commission Considers Application Acceptance
October 2024	0	Application Acceptance Order
October 2024	5	Notice of Public Information and Scoping Meetings
October / November 2024	30	Public Information and Scoping Meetings
December 2024	60	Scoping Decision Issued
April / May 2025	150	EA Issued Notice of EA Availability and Public Hearing
June 2025	180	Public Hearing
July 2025	210	Public Hearing Comment Period Closes
July 2025	210	Applicant Responses to Hearing Comments
Summary of Public Testimony		
	220	Applicant Proposed Findings
	230	EERA Responses to Comments on EA; Technical Analysis; Replies to Applicant Proposed Findings
	230	ALJ Submits Summary of Public Testimony
	260	Commission Staff Prepares Findings and Proposed Route Permit
	280	Commission Considers Route Permit Issuance
Full ALJ Report with Findings, Conclusions, and Recommendations		
	220	Applicant Proposed Findings
	230	EERA Responses to Comments on EA; Technical Analysis; Replies to Applicant Proposed Findings
	260	ALJ Submits Full Report
	275	Exceptions to ALJ Report
	290	Commission Staff Prepares Proposed Route Permit
	310	Commission Considers Route Permit Issuance

DAIRYLAND POWER COOPERATIVE
A Touchstone Energy® Cooperative

Project Overview

LEGEND

- Proposed Route
- Proposed ROW
- Proposed Alignment
- Existing Dairyland 69 kV Transmission
- Existing Dairyland 161 kV Transmission
- State Boundary
- Parcels
- PLSS Section
- Civil Township

Map Labels: 12, 7, 8, 17, 16, 18, 13, 161st Ave, 171st Ave, CSAH 5, CSAH 44, 24, 19, 20, 21, 120th St, 29, 28, 25, 30, 110th St, 181st Ave, 36, 31, 32, 33, State Line Rd, MINNESOTA, IOWA, York Township

Inset Map: Wisconsin, Minnesota, Iowa

Scale: 0 to 2,000 Feet

PATH: \\MSPE-GIS-FILE\GISPROJ\DAIRYLAND\10311735_BEAVERCREEK\7.2_WIP\MAP_DOCS\DRAFT\RPA_DOCUMENT\RPA_DOCUMENTPRO\RPA_DOCUMENTPRO.APRX - USER: JWALTER - DATE: 8/20/2024

CERTIFICATE OF SERVICE

I, Hannah Olson, hereby certify that I have this day, served a true and correct copy of the following document to all persons at the addresses indicated below or on the attached list by electronic filing, electronic mail, courier, interoffice mail or by depositing the same enveloped with postage paid in the United States mail at St. Paul, Minnesota.

Minnesota Public Utilities Commission ORDER

Docket Number ET-3/TL-24-95

Dated this 15th day of October, 2024

/s/ Hannah Olson

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Justin	Chasco	jchasco@fredlaw.com	Fredrikson & Byron, P.A.	44 E. Mifflin Street Suite 1000 Madison, WI 53703	Electronic Service	No	OFF_SL_24-95_TL-24-95
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_24-95_TL-24-95
Bridget	Duffus	bduffus@fredlaw.com	Fredrikson & Byron, P.A.	60 S Sixth St Ste 1500 Minneapolis, MN 55402-4400	Electronic Service	No	OFF_SL_24-95_TL-24-95
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 551012198	Electronic Service	No	OFF_SL_24-95_TL-24-95
Caleb J	Hefti	Caleb.Hefti@DairylandPower.com	Dairyland Power Cooperative	3200 East Ave. S. PO Box 817 La Crosse, WI 54602-0817	Electronic Service	No	OFF_SL_24-95_TL-24-95
Breann	Jurek	bjurek@fredlaw.com	Fredrikson & Byron PA	60 S Sixth St Ste 1500 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_24-95_TL-24-95
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_24-95_TL-24-95
Jessica A.	Sandry	Jessica.Sandry@DairylandPower.com	Dairyland Power Cooperative	3200 East Ave. S. PO Box 817 La Crosse, WI 54602-0817	Electronic Service	No	OFF_SL_24-95_TL-24-95
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th Pl E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_24-95_TL-24-95