

BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

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Chair  
Commissioner  
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ISSUE DATE: April 21, 2025

In the Matter of Xcel Energy's 2024–2040  
Upper Midwest Integrated Resource Plan

DOCKET NO. E-002/RP-24-67

In the Matter of Xcel Energy's Competitive  
Resource Acquisition Process for up to 800  
Megawatts of Firm Dispatchable Generation

DOCKET NO. E-002/CN-23-212

ORDER APPROVING SETTLEMENT  
AGREEMENT WITH MODIFICATIONS

**PROCEDURAL HISTORY**

On May 24, 2023, Northern States Power Company, d/b/a Xcel Energy (Xcel), filed a notice petition to initiate a resource acquisition process for up to 800 megawatts (MW) of firm dispatchable resources in docket number E-002/CN-23-212 (the firm dispatchable docket).

On November 3, 2023, in the firm dispatchable docket, the Commission issued its Order Approving Petition and Requiring Compliance Filing.

On February 1, 2024, Xcel filed its Upper Midwest Integrated Resource Plan for 2024–2040 (2024–2040 IRP) in docket Number E-002/RP-24-67.

On February 22, 2024, the Commission issued an order referring Xcel's 2024–2040 IRP to the Office of Administrative Hearings (OAH) for the sole purpose of conducting public meetings.

On April 2, 2024, in the firm dispatchable docket, the Commission issued its Notice of and Order for Hearing. As part of the order, the Commission found project proposals for firm dispatchable resources from several bidders to be complete and referred the matter to the OAH for contested case proceedings.

On October 3, 2024, Xcel filed a settlement agreement in both dockets.

On October 9, 2024, in the firm dispatchable docket, the OAH filed the administrative law judge's (ALJ) Order for Certification of Settlement. The ALJ did not make recommendations on the settlement agreement.

On October 25, 2024, Xcel filed comments in support of the settlement agreement.

By December 17, 2024, comments were filed in one or both dockets by:

- The Prairie Island Indian Community
- Minnesota Solar Energy Industries Association (MnSEIA)
- Department of Commerce, Division of Energy Resources (Department)
- CURE, the Minnesota Environmental Justice Table, Mankato Area Zero Waste, and the Minnesota Zero Waste Coalition (Joint Commenters)
- Clean Energy Organizations (CEOs)
- National Grid Renewables Development, LLC (NGR)
- Solar United Neighbors (SUN)
- Distributed Solar Parties<sup>1</sup> (DSP)
- U.S. General Services Administration
- Office of the Attorney General—Residential Utilities Division (OAG)
- Xcel Large Industrials (XLI)
- Invenergy Renewables, LLC (Invenergy)
- Greater Mankato Growth
- Rural Minnesota Energy Board
- LJP Waste Solutions, LLC
- Sheriff Marty Kelly
- Prairieland Solid Waste Management
- Minnesota Resource Recovery Association

By December 20, 2024, reply comments were filed in one or both dockets by:

- Xcel
- DSP
- OAG
- NoCapX 2020 and Legalelectric
- NGR
- Red Wing Area Chamber of Commerce
- XLI
- CEOs
- Department
- Ramsey/Washington Recycling & Energy Board
- Blue Earth County
- LIUNA Minnesota and North Dakota (LIUNA)
- Operating Engineers Local 49 (Local 49) and North Central States Regional Council of Carpenters (Carpenters)

By February 4, 2025, hundreds of written public comments were filed into the record in addition to the comments made at public meetings held by the ALJ.

On February 18 and 20, 2025, this matter came before the Commission.

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<sup>1</sup> The Distributed Solar Parties are comprised of Cooperative Energy Futures, The Environmental Law & Policy Center, The Institute for Local Self Reliance, and Vote Solar.

## FINDINGS AND CONCLUSIONS

### I. Background

#### A. Resource Planning

A public utility, such as Xcel, that provides electricity to at least 10,000 customers and is capable of generating 100 megawatts (MW) of electricity must file a resource plan for the Commission's approval, rejection, or modification. A resource plan generally details the utility's projected need for electricity in its service territory for a forecasted period, and the utility's plans for meeting the projected need, including the actions it will take in the next five years.<sup>2</sup> A utility must also discuss any plans to reduce existing resources, such as through retirements.<sup>3</sup> The Commission evaluates resource plans based on their ability to:

- A. maintain or improve the adequacy and reliability of utility service;
- B. keep the customers' bills and the utility's rates as low as practicable, given regulatory and other constraints;
- C. minimize adverse socioeconomic effects and adverse effects upon the environment;
- D. enhance the utility's ability to respond to changes in the financial, social, and technological factors affecting its operations; and
- E. limit the risk of adverse effects on the utility and its customers from financial, social, and technological factors that the utility cannot control.<sup>4</sup>

To reliably provide the electricity demanded by its customers, an electric utility considers both supply and demand. The utility can supply electricity through a combination of generation and power purchases, and by reducing the amount of electricity lost through transmission and distribution. The utility can manage customer demand by encouraging customers to conserve electricity or to shift activities requiring electricity to periods when there is less demand on the electric system. A resource plan contains a set of demand- and supply-side resource options that the utility could use to meet the forecasted needs of retail customers.<sup>5</sup> By integrating the evaluation of supply- and demand-side resource options—treating each resource as a potential substitute for the others—a utility can find the least-cost plan that is consistent with legal requirements and policies.

Any number of combinations of resources might permit a utility to match supply with demand under a given set of assumptions. To select a plan that balances the needs for maintaining reliability, reducing adverse environmental and socioeconomic burdens, and minimizing rates, a

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<sup>2</sup> See Minn. Stat. § 216B.2422; Minn. R. Ch. 7843.

<sup>3</sup> Minn. R. 7843.0400, subp. 2.

<sup>4</sup> Minn. R. 7843.0500, subp. 3.

<sup>5</sup> Minn. Stat. § 216B.2422, subd. 1 (d).

utility then analyzes various options under a variety of assumptions—including assumptions about unanticipated deviations from forecasts, or unexpected failures of generators or transmission facilities. Computer models help parties evaluate each scenario under a variety of assumptions. Specifically, utilities develop a *base case scenario*, and develop other scenarios as variations on the base case. While the base case scenario has no greater weight than any other scenario, it tends to reflect a conventional, status quo position. After analyzing the various scenarios, the utility selects a *preferred plan*.

Although the Commission must approve, reject, or modify the resource plans of investor-owned utilities, the resource-planning process is largely collaborative and iterative.

The process is collaborative because a wide array of facts and considerations may be relevant to resource choices or deployment timetables. The facts on which resource decisions depend—how quickly an area and its need for electricity will grow, how much electricity will cost over the lifetime of a generating facility or a purchased-power contract, how much conservation potential the service area holds and at what cost—all require the kind of careful judgment that sharpens with exposure to the views of engaged and knowledgeable stakeholders.

The process is iterative because analyzing future energy needs and preparing to meet them is not a static process; strategies for meeting future needs are always evolving in response to changes in actual conditions. When demographics, economics, technologies, or environmental regulations change, so do a utility’s resource needs and its strategies for meeting them.

## **B. Resource Acquisition Strategies**

A resource planning process will identify the resources a utility should pursue—and, in particular, the size, type, and timing of resources. But where a plan identifies the need for a new resource, it will generally not identify a specific project, developer, or owner, or the specific terms governing a power purchase agreement. Thus, even after identifying the optimal size, type, and timing for a new resource, the Commission still has the task of identifying the optimal method for selecting among resources that meet the size/type/timing requirements.

One option is to acquire a new resource through the certificate of need process. Before a developer builds a generator with capacity of 50 MW or more in Minnesota,<sup>6</sup> Minn. Stat. § 216B.243 requires the developer to acquire a certificate of need demonstrating that there are no more cost-effective means to meet the alleged need.

But the Legislature provides various exceptions to the certificate of need process. For example, Minn. Stat. § 216B.243, subd. 9, eliminates the need for a certificate of need for projects that are designed to provide energy to fulfill the state’s renewable energy standards or solar energy standards under Minn. Stat. § 216B.1691. And Minn. Stat. § 216B.2422, subd. 5, provides an exception for generators that are selected via a Commission-approved bidding process. Over Xcel’s last several resource plans, the Commission has developed three bidding processes. These processes are described briefly here.

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<sup>6</sup> See Minn. Stat. § 216B.2421, subd. 2(1).

Track 1 is a competitive process that applies when Xcel does not plan to submit its own bid. Under Track 1, Xcel solicits proposals to fill an identified need, then evaluates the bids and submits the resulting contracts to the Commission for approval.

Track 2 is a competitive process that applies when Xcel intends to offer its own proposals. Under Track 2, Xcel solicits proposals to fill all or part of an identified need. The bids are then sent to a contested case process, allowing parties to file testimony, followed by an evidentiary hearing, briefs, an ALJ’s recommendation, and ultimately a Commission determination.

Modified Track 2 also establishes a competitive process that applies when Xcel intends to offer its own proposals. As in the Track 1 process and the Track 2 process, Xcel solicits proposals to meet all or part of an identified need. But under Modified Track 2, Xcel must submit its own proposals a day before any of the bids from other developers are due. Xcel then evaluates all the proposals received based on an established list of factors, and identifies projects to pursue in negotiations. Thereafter, Xcel reports to the Commission its own analysis and recommendations regarding the bids and the results of a third-party auditor’s report on the bidding process, among other topics.

### **C. Xcel’s 2020–2034 Resource Plan**

Xcel filed its last IRP, which covered the planning period 2020–2034, in 2019 (2019 IRP).<sup>7</sup> The Commission ultimately approved a modified version of that plan, made various findings, and imposed requirements on Xcel.<sup>8</sup> Of particular relevance to this proceeding, the Commission found that there would likely be a need for up to approximately 800 megawatts (MW) of firm dispatchable resources between 2027 and 2029.<sup>9</sup> The Commission directed Xcel to include in a future proceeding an evaluation of renewable resources and storage that could deliver the necessary grid attributes to meet the anticipated need.

### **D. Firm Dispatchable Docket**

In response, Xcel filed a petition to initiate a competitive resource acquisition process for up to 800 MW of firm dispatchable resources in the firm dispatchable docket.<sup>10</sup> The Commission approved Xcel’s framework for evaluating proposed projects,<sup>11</sup> and after receiving proposals from various bidders, the Commission found project proposals from Invenergy, Onward Energy

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<sup>7</sup> *In the Matter of the 2020–2034 Upper Midwest Integrated Resource Plan of Northern States Power Company d/b/a Xcel Energy*, Upper Midwest Integrated Resource Plan 2020–2034, Docket No. E-002/RP-19-368 (July 1, 2019).

<sup>8</sup> *In the Matter of the 2020–2034 Upper Midwest Integrated Resource Plan of Northern States Power Company d/b/a Xcel Energy*, Order Approving Plan with Modifications and Establishing Requirements for Future Filings (April 15, 2022).

<sup>9</sup> The Commission defined the term “firm dispatchable” as “a resource or combination of resources that is able to provide capacity and energy.” *Id.* at Ordering Paragraph 3(A).

<sup>10</sup> *In the Matter of Xcel Energy’s Competitive Resource Acquisition Process for up to 800 Megawatts of Firm Dispatchable Generation*, Notice Petition, Docket No. E-002/CN-23-212 (May 24, 2023).

<sup>11</sup> *In the Matter of Xcel Energy’s Competitive Resource Acquisition Process for up to 800 Megawatts of Firm Dispatchable Generation*, Order Approving Petition and Requiring Compliance Filing, Docket No. E-002/CN-23-212 (November 3, 2023).

Holdings (Onward), Rondo Energy, Inc. (Rondo), and Xcel to be complete.<sup>12</sup> The Commission referred the matter to the OAH for contested case proceedings to determine the project(s) that would best meet Xcel's capacity need in the 2027–29 time period.<sup>13</sup>

#### **E. 2024–2040 IRP**

With the firm dispatchable docket ongoing, Xcel filed its 2024–2040 IRP. Key elements of Xcel's preferred plan included adding renewable resources, battery storage systems, and firm dispatchable resources. Additionally, Xcel proposed to extend operations at both of its nuclear plants and at its three refuse-derived fuel (RDF) waste-to-energy generating plants. Finally, Xcel reaffirmed its proposal to close its remaining coal units by 2030, which the Commission previously approved.

Xcel's load forecast in its 2024–2040 IRP was significantly higher than in its 2019 IRP due to expected increases in data center loads, adoption of electric vehicles, and space and water-heating electrification. In its 2019 IRP, Xcel expected peak customer demand and sales to increase by less than one percent annually. In contrast, Xcel now expects net peak demand to grow at 1.8 percent per year and net energy sales to grow at more than 2.0 percent per year. This increased growth creates a greater need for resources, Xcel stated, including firm dispatchable resources.

#### **II. Settlement Agreement**

Xcel subsequently filed a settlement agreement meant to resolve issues in both the firm dispatchable docket and its 2024–2040 IRP. In light of the settlement agreement, the ALJ stayed the contested-case proceedings in the firm dispatchable docket pending further action by the Commission.

Signatories to the settlement agreement included many of the parties and intervenors involved in the dockets, including Xcel, the Department, the CEOs, LIUNA, Local 49, Carpenters, NGR, DE Shaw Renewable Investments, LLC (DESRI), Onward, and Invenergy (collectively, the settling parties). Not all signatories participated in both dockets, and others who participated in the dockets—such as the OAG and XLI—did not sign the agreement.

The settlement agreement contains terms specific to each docket. For the firm dispatchable docket, the settling parties agreed to (1) a selection of project bids, (2) a power purchase agreement process, and (3) that Xcel would provide modeling on the selected bids to support the settlement agreement. The selection of project bids, which are all located in Minnesota, includes:

- Xcel's bid for the new Lyon County Generating Station, a natural gas-fired, 420 MW combustion turbine plant in Lyon County.

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<sup>12</sup> *In the Matter of Xcel Energy's Competitive Resource Acquisition Process for up to 800 Megawatts of Firm Dispatchable Generation*, Notice of and Order for Hearing, Ordering Paragraph 1, Docket No. E-002/CN-23-212 (April 2, 2024).

<sup>13</sup> *Id.* at Ordering Paragraph 3.

- Xcel's bid for the Sherburne County Generating Station (Sherco) four-hour battery energy storage system (BESS), a 300 MW BESS adjacent to and interconnected with the Sherco Solar Generating System in Sherburne County.
- Onward Mankato Energy Center and BESS to proceed to the power purchase agreement (PPA) negotiation phase. This would be an extension of an existing PPA for the output of a 375 MW natural gas combined-cycle facility located in Mankato with the addition of an 11 MW BESS.
- Invenergy Cannon Falls Energy Center to proceed to the PPA negotiation phase. This would be an extension of an existing PPA for the output of a 357 MW natural gas combustion-turbine facility located in Cannon Falls.
- DESRI North Star Energy Storage bid to proceed to the PPA negotiation phase. This would be a four-hour BESS located at the existing North Star Solar facility in Chisago County.
- NGR Plum Creek Wind + Storage bid to proceed to the PPA negotiation phase. This would be a 230 MW wind facility paired with a 150 MW BESS located in Redwood, Murry, and Cottonwood counties.
- Invenergy Lake Wilson Solar + Storage bid to proceed to the PPA negotiation phase. This would be a solar-plus-storage facility sized at 150 MW photovoltaic and up to a 95 MW/380 MWh BESS located in Leeds Township, Murray County.

For the IRP Docket, the settling parties agreed to (1) a Five-Year Action Plan, (2) provisions for resource procurement, (3) provisions for Xcel's next integrated resource plan, (4) equity and labor commitments, and (5) additional program and pilot findings. The Five-Year Action Plan includes the following targets for resource acquisition:

- **Wind:** 3,200 MW through 2030. 2,800 MW are projected to use the Minnesota Energy Connection transmission line submitted for a certificate of need and route permit in dockets E-002/CN-22-131 and E-002/TL-22-132.
- **Solar:** 400 MW through 2030, which are projected to use the King Interconnection.<sup>14</sup>
- **Standalone Storage:** 600 MW by 2030. 120 MW are projected to use the Minnesota Energy Connection.
- **Nuclear:** Extension of the Monticello Nuclear Generating Plant to 2050 and Prairie Island Generating Plant Units 1 and 2 to 2053 and 2054, respectively, for planning purposes.

The settling parties clarified that, other than the resources selected from the firm dispatchable docket, the Five-Year Action Plan does not include size, type, or timing decisions for new generic resources that could include combustion-turbine gas plants, and the Five-Year Action Plan does not include additional new gas generation with unconstrained carbon emissions. Additionally, the settlement agreement provides that in the event of changed circumstances that

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<sup>14</sup> Xcel currently owns and operates the Allen S. King plant, a coal-fired power station, but Xcel plans to retire the facility in 2028.

require additional resources beyond those identified in the Five-Year Action Plan, Xcel could file a petition with the Commission to obtain approval for the resources.

#### **A. Comments in Support of the Settlement Agreement**

Many stakeholders filed comments in support of the settlement agreement. Xcel asserted that the agreement “is in the public interest because it meets the needs of our customers while balancing reliability, affordability, and environmental stewardship.”<sup>15</sup> Xcel also noted that the agreement would result in an annual rate increase of less than one percent relative to a base case, meet growing customer demand, and ensure that the utility is on track to comply with the carbon-free standard.<sup>16</sup>

Echoing Xcel’s support for the settlement agreement, the CEOs—who, like Xcel and the Department, conducted their own modeling—stated that their analysis demonstrated that the agreement is in the public interest. The Department, DERSI, Invenergy, Local 49 and the Carpenters, LIUNA, NGR, and Onward Energy, among others, also urged the Commission to approve the settlement agreement.

Other stakeholders filed comments—many of which supported approval of the settlement agreement—that focused on specific issues, such as extending Xcel’s nuclear and RDF facilities, additional Distributed Capacity Procurement (DCP), and the possibility of a voluntary carbon-free electricity (CFE) procurement program.

#### **B. Comments in Opposition to the Settlement Agreement**

The OAG filed comments in opposition to the settlement agreement as did NoCapX 2020 and Legalelectric (jointly) and XLI. Their opposition primarily focused on protecting ratepayers from unreasonable costs, but the OAG also questioned Xcel’s plan to build the Lyon County Generating Station without seeking a certificate of need. These parties were particularly concerned that Xcel proposed to acquire resources in excess of the up to 800 MW identified in Xcel’s 2019 IRP.

If the Commission nevertheless approved the settlement agreement, these commenters recommended that the Commission impose requirements on Xcel that would provide protection to ratepayers and ensure compliance with applicable laws.

#### **C. Commission Action**

Based on the record and proceedings herein, the Commission finds that the settlement agreement should be approved as modified in this order. The settlement agreement reasonably supports energy adequacy, reliability, and affordability and minimizes adverse socioeconomic and environmental impacts, all while accounting for significant anticipated load growth and compliance with the state’s carbon-free goals. It is notable that so many stakeholders with diverging interests coalesced around the settlement agreement. The Commission appreciates the

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<sup>15</sup> Xcel’s Comments in Support of Settlement Agreement, p. 3 (October 25, 2024).

<sup>16</sup> Minn. Stat. § 216B.1691, subd. 2g requires electric utilities to generate or procure increasing amounts of carbon-free energy, as measured by a percentage of total retail electric sales, by certain years. By 2040, 100% of electric utilities’ electricity must come from carbon-free technologies.

settling parties' efforts in reaching a consensus on the various issues in both dockets. The settlement agreement is consistent with the public interest and the requirements of Minn. Stat. § 216B.2422 and Minn. R. 7843.0500, subp. 3, and the Commission will approve it, as modified in this order.

Those opposed to the settlement agreement raised important issues about protecting ratepayers from unreasonable costs, and they correctly observed that under the settlement agreement Xcel will acquire more resources than the 800 MW identified in its 2019 IRP. But the planning landscape is significantly different now than it was a few years ago, and all three modeling parties—the Department, the CEOs, and Xcel—all identified resource needs beyond 800 MW.

To protect ratepayers, the Commission will require that costs be capped for all resources identified in the settlement agreement at bid amounts as of October 2, 2024, unless Xcel demonstrates by substantial evidence that additional costs are prudent and were caused by events out of its control. Also, while the Commission chooses the Lyon County Generating Station in this resource plan, the Commission will require Xcel to file a certificate of need petition pursuant to Minn. Stat. § 216B.243 jointly with the site permit. This will offer meaningful opportunities for public participation and foster robust record development.

Within six months of the in-service date of Lyon County Combustion Turbine or 30 days before the next rate case filing, whichever is sooner, Xcel must file comprehensive, substantial evidence in support of the cost recovery of the Lyon County Combustion Turbine in both of these dockets.

### **III. Resolved Issues from the Settlement Agreement**

In this section, the Commission addresses issues from the settlement agreement that parties supported or did not oppose, except as discussed above. Any modifications to the settlement agreement or additional requirements are as noted. The ALJ did not make recommendations on specific issues.

#### **A. Five-Year Action Plan**

As discussed above, the Five-Year Action Plan identifies size, type, and timing targets for resource acquisition in addition to the projects selected from the firm dispatchable docket. The Commission concurs with the settling parties on the reasonableness of Xcel's Five-Year Action Plan, as detailed in the settlement agreement, and will therefore approve it.

Xcel needs additional resources to meet forecasted energy needs, in part, because it intends to retire its remaining coal units by 2030. Xcel has proposed retiring coal units as part of its IRPs for the last 10 years, largely because operating those units was expected to be more expensive than using other resources. For example, in the IRP Xcel filed in 2015, Xcel proposed, and the Commission approved, a plan to retire Sherco Units 1 and 2 in the mid-2020s because retiring and replacing those units was the least-cost scenario.<sup>17</sup>

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<sup>17</sup> *In the Matter of Xcel Energy's 2016–2030 Upper Midwest Resource Plan*, Order Approving Plan with Modifications and Establishing Requirements for Future Resource Plan Filings, Docket No. E-002/RP-15-21 (January 11, 2017).

Similarly, in its 2019 IRP, Xcel explained that its preferred plan included retirement of all its remaining coal units (Sherco Unit 3 and the Allen S. King plant) because general market trends showed decreasing costs of renewables, low natural gas prices, the need for more flexible resources, and other factors that were expected to make it more difficult for coal resources to operate in an efficient and economic manner beyond 2030.<sup>18</sup> In the 2019 IRP, the coal retirement dates were part of a broader agreement with labor and environmental groups aimed to economically replace coal generation with renewable generation and energy efficiency. The 2019 IRP also included plans to support affected workers and host communities.

Xcel reiterated in its 2024–2040 IRP (this docket) that closing its coal units makes economic sense because replacing coal generation with other energy resources is more cost effective.<sup>19</sup> The Commission agrees that it is in ratepayers' interests for Xcel to retire its coal units as previously ordered, and the Commission finds that the Five-Year Action Plan and selected projects included in the settlement agreement are necessitated in part by Xcel's continuing commitment to retire Sherco Unit 1 in 2026, King in 2028, and Sherco Unit 3 in 2030.

## **B. Resource Acquisition Process**

The settling parties agreed to using either of two bidding processes, depending on whether Xcel bids, for resources identified in the Five-Year Action Plan. When Xcel does not intend to bid, the settlement agreement provides that the Track 1 bidding process should be used. When Xcel does intent to bid, the Modified Track 2 bidding process should be used.

The settling parties also agreed that the Commission should authorize, but not require, Xcel to use a Track 1 or Modified Track 2 bidding process to procure resources for carbon-free energy customer programs that are approved by the Commission and may be procured as part of a bidding process for resources identified in the Five-Year Action Plan or a separate acquisition process. In any petition requesting approval of a proposed resource acquisition, the settling parties agreed that Xcel would discuss its approach to ensuring non-participating customers are not harmed or disadvantaged by procurement undertaken for voluntary customer programs.

The Commission is persuaded that these processes reasonably protect ratepayer interests and should be approved.

## **C. Firm Dispatchable Bids**

The Commission will approve the firm dispatchable bids selected in the settlement agreement. To protect ratepayers, the Commission will also require the evaluation of PPAs from non-utility bidders' projects as contemplated in the settlement agreement including, but not limited to, whether:

- The prices and terms put ratepayers at risk for costs that are higher than bid or for benefits assumed in bids that do not materialize.

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<sup>18</sup> *In the Matter of the 2020–2034 Upper Midwest Integrated Resource Plan of Northern States Power Company d/b/a Xcel Energy*, Upper Midwest Integrated Resource Plan 2020–2034, p. 117, Docket No. E-002/RP-19-368 (July 1, 2019).

<sup>19</sup> Initial 2024–2040 Resource Plan Filing, Chapter 4, p. 5 (February 1, 2024).

- The agreements had terms which sufficiently protected ratepayers from risks associated with the non-deliverability of accredited capacity and/or energy from the project(s) as proposed.
- The terms of any agreements inappropriately shifted risk or unknown costs to ratepayers.
- The delay and cancellation provisions are reasonable.

#### **D. Demand Side Management (DSM) Resources**

In its order approving Xcel’s 2019 IRP, the Commission directed Xcel to save at least 780 gigawatt-hours (GWh) of energy via energy efficiency each year through 2034.<sup>20</sup> Xcel stated in the present dockets that its preferred plan would achieve annual energy savings of 582 GWh, but when combined with naturally occurring energy efficiency, total energy efficiency would exceed 780 GWh on an average annual basis.

Xcel defined “naturally occurring” energy efficiency as “routine adoption of efficient measures outside of programs or progression of codes and standards that specify minimum performance levels.”<sup>21</sup> Xcel further explained that when a change in codes and standards occurs, Xcel “can calculate these effects to demonstrate the effect of energy conservation that is not accounted for in” its Energy Conservation and Optimization (ECO) program.<sup>22</sup>

The concept of measuring naturally occurring energy efficiency is novel, and it raises questions that would benefit from further record development.<sup>23</sup> At this time, the Commission is not persuaded that it should count naturally occurring energy efficiency toward Xcel’s achievement of energy savings goals or requirements. Instead, the Commission will reduce the amount of energy savings from energy efficiency to 580 GWh and require that it be programmatic energy savings.

Turning to another DSM resource, Xcel’s Encompass modeling selected additional demand response, which Xcel included in its preferred plan.<sup>24</sup> To ensure these resources are added, the Commission will require Xcel to add 60 to 70 MW of incremental demand response resources, as reflected in its preferred plan. Xcel must propose measures to fulfill this requirement in an ECO program modification and/or in a proposal filed with the Commission by October 31, 2025, or another time as established by the Executive Secretary.

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<sup>20</sup> *In the Matter of the 2020–2034 Upper Midwest Integrated Resource Plan of Northern States Power Company d/b/a Xcel Energy*, Order Approving Plan with Modifications and Establishing Requirements for Future Filings, Docket No. E-002/RP-19-368, Ordering Paragraph 2.A.1 (April 15, 2022).

<sup>21</sup> Initial 2024–2040 Resource Plan Filing, Appendix J, p. 3 (February 2, 2024).

<sup>22</sup> *Id.* A program approved through ECO is administered by a utility with regulatory oversight by the Department. ECO portfolios promote energy efficient technologies and practices by providing rebates, marketing, and technical assistance to utility customers. The Department reviews and approves ECO regulatory filings.

<sup>23</sup> For example, there was little discussion in the record on Xcel’s method for calculating naturally occurring energy efficiency and its projections that historically observed rates will continue into the future.

<sup>24</sup> Initial 2024–2040 Resource Plan Filing, Appendix J, p. 14 (February 2, 2024).

## **E. Thermal Battery Pilot**

Prior to the settlement agreement, Rondo submitted a proposal for a thermal heat battery, which could discharge both electricity and steam heat, to be located at the Sherco site. Rondo highlighted the benefits of a heat battery, such as rapid charging, long duration, long operational life without performance degradation, and the possibility for cogeneration. Additionally, the battery would be produced without rare earth materials or any hazardous chemicals.

Rondo ultimately withdrew its proposal from the firm dispatchable docket, but in the settlement agreement the parties agreed that Xcel would continue exploring options for a thermal battery with Rondo. The agreement provides that Xcel must file a pilot proposal by December 31, 2025, or an explanation for why a pilot proposal would not be reasonable. If Xcel proposes a pilot project, the settlement agreement requires that it be sufficiently large to provide learning opportunities for scalability of the thermal battery technology and potential for optimization of any renewable resources that provide energy for storage in the thermal battery.

No party opposed this provision of the settlement agreement, and the Commission agrees with the settling parties that Xcel should continue exploring a thermal heat battery with Rondo. Not only do these resources have the same potential benefits as other storage systems (e.g., improved system reliability, usable when intermittent resources are unavailable), they have other benefits that Rondo identified, such as performance without degradation and the possibility for cogeneration. The Commission will require Xcel to continue exploring thermal battery options with Rondo as agreed to in the settlement agreement.

## **F. Distributed Capacity Procurement**

The settling parties also agreed that Xcel should pursue a distributed capacity procurement (DCP) proposal. Xcel described DCP as a version of a virtual power plant (VPP) that would leverage Xcel's planning and procurement capabilities along with a distributed energy resource (DER) supply chain to facilitate deployment of DERs at scale across the distribution system. Xcel stated that relevant distributed energy technologies could include battery storage, backup generation, solar generation, and energy efficiency measures, and Xcel would lead procurement efforts to encourage customers to install DER at homes and businesses that are the best locations on the grid to maximize efficiency of existing infrastructure.

Xcel noted that while it includes distributed generation capacity in its IRPs and integrated distribution plans (IDPs), the distributed generation additions Xcel forecasts are driven by policy and customer adoption rather than model-selected resources. According to Xcel, a DCP program could align retail distributed generation programs with system value, and several possible benefits to a DCP program include maximizing grid value, supporting system resilience, opportunities for promoting equity, and furthering clean energy deployment, among others.

The settlement agreement requires Xcel to file a DCP proposal, with an evaluation of how the DCP program could be used to improve equity, by October 3, 2025. No party opposed requiring Xcel to file a DCP proposal. SUN, MnSEIA, and DSP filed separate comments in support of a DCP program, but they also urged the Commission to ensure that Xcel's forthcoming proposal includes participation from customer-owned and third-party-owned resources instead of Xcel exclusively owning and controlling the participating DERs.

A DCP program could provide substantial benefits to ratepayers, such as maximizing the efficiency of existing infrastructure and supporting system resilience, and the Commission will therefore require Xcel to file a DCP proposal by October 3, 2025, as stipulated in the settlement agreement. Commenters concerns about DER ownership in a DCP program can be addressed in future proceedings after Xcel files its DCP proposal.

In addition to an evaluation of how the DCP program could be used to improve equity, Xcel must include with its filing:

- A discussion of how the proposal impacts the Five-Year Action Plan approved in this order, how it impacts the IRP forecasted annual distributed generation solar additions, and whether the DCP could be used to advance compliance with the distributed solar energy standard.
- An evaluation of a costs and benefits comparison between a utility-owned and managed DCP model and alternative models allowing participation from customer-owned and third-party-owned resources.
- An evaluation of the labor standards utilized by Xcel and third-party solar installers.

## **G. Equity and Labor**

The settling parties agreed to certain equity and labor commitments in the settlement agreement, including the following:

- Xcel must continue working with interested stakeholders to assess current participation levels and barriers in energy efficiency programs and other energy savings opportunities for lowest income customers, and to consider options to support increased participation. Xcel will report on the results of these efforts in Xcel's next ECO plan filing.
- Xcel must work with community, organized labor and other interested stakeholders to use the implementation of Xcel's resource plan to expand career opportunities for populations that are currently underrepresented in energy sector employment. Where feasible, such efforts must include tracking employment of diverse and local workforce by Xcel, direct vendors, and subcontractors working on projects and programs authorized in the resource plan, comparable to tracking of use of local workforce that is currently required as a condition of site permits issued by the Commission. Xcel will report on the results of these efforts in Xcel's next Integrated Resource Plan filing.
- Xcel must continue to work with parties representing organized labor to maximize socioeconomic benefits to customers and host communities by prioritizing creation of high-quality jobs and apprenticeship pathways for local workers in the implementation of projects and programs included in the resource plan, including distributed energy resources, consistent with Xcel's current process for acquiring transmission-scale resources.

Commenters supported Xcel's equity-related efforts. Some commenters made suggestions meant to improve or effectuate Xcel's efforts, such as the CEOs' recommendation that Xcel work with

the Environmental Justice Advisory Board (EJAB)<sup>25</sup> to better understand how to prioritize and incentivize investments and economic benefits for underserved communities.

As the Commission found in its order approving Xcel’s last IRP, resource planning is an appropriate context for addressing equity issues. The Commission agrees with the settling parties that Xcel should continue its work on equity issues and will therefore approve the relevant language from the settlement agreement. To further Xcel’s efforts, the Commission will also adopt the CEOs’ recommendation that Xcel work with the EJAB to better understand how to prioritize and incentivize investments and economic benefits for underserved communities.

#### **IV. Disputed Issues**

Commenters were divided on extending operations at Xcel’s nuclear facilities and its RDF plants.

##### **A. Nuclear Resources**

As noted above, the settling parties agreed to an extension, for planning purposes, of both of Xcel’s nuclear plants—the Prairie Island Nuclear Generating Plant (PINGP) and the Monticello Nuclear Generating Plant (MNGP). Currently, PINGP Unit 1 and Unit 2 are scheduled to retire in 2033 and 2034 respectively and MNGP in 2040. Xcel stated in its initial IRP filing that continuing operations at its nuclear plants would benefit customers by providing ongoing baseload power, which is particularly beneficial when intermittent resources are unavailable. Also, Xcel asserted that without its nuclear generation it would not be able to cost-effectively achieve such significant levels of carbon reduction.

Xcel emphasized that the nuclear plant extensions in the settlement agreement were for planning purposes only. To effectuate plant extensions, Xcel would need approval from the Commission (related to spent nuclear fuel storage) and the federal Nuclear Regulatory Commission as well as licenses and permits from other governmental agencies.

##### **1. Comments**

Commenters took varying positions on extending operations at Xcel’s nuclear facilities. Some of those who supported extension of the facilities recognized the value of having firm dispatchable resources that further the state’s clean energy goals, while others highlighted the employment and tax benefits the facilities provide to local communities. Those opposed raised concerns about the facilities’ impacts on human health and the environment.

The Prairie Island Indian Community (PIIC) did not oppose the extension of PINGP but stated that the issue is of existential importance to the PIIC due to the community’s close proximity to the facility. To ensure that sufficient resources are available to maintain PINGP and MNGP, the PIIC requested that Xcel provide information on planned near- and long-term investments in the facilities. The PIIC also requested that Xcel provide more detail in its next IRP on its actions to remove spent nuclear fuel from PINGP, and a realistic assessment of when the Department of Energy will begin removing spent fuel.

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<sup>25</sup> The EJAB advises Xcel on incorporating equity into its core business efforts.

## 2. Commission Action

The Commission will approve extensions of PINGP and MNGP for planning purposes. These facilities are dispatchable resources that support system reliability, which is particularly important as Xcel adds intermittent resources to its system. Use of the facilities also furthers the state's decarbonization goals.

The Commission agrees with the PIIC that Xcel should provide information about its planned investments at the facilities and its actions to remove spent fuel from PINGP. Accordingly, the Commission will require Xcel to do the following:

- Provide a schedule of planned investments at its nuclear plants, with expenditure breakdowns by facility detailing when investments will occur and their purpose.
  - For near-term investments, Xcel must provide the requested information within 90 days of this order.
  - For long-term investments, Xcel must provide the information as part of its next IRP.
- Provide more detail regarding its actions to remove spent fuel from PINGP and a more current and realistic assessment of when the Department of Energy will begin removing spent nuclear fuel from PINGP.

## B. RDF Plant Extensions

Xcel's RDF plants burn waste from local communities to produce dispatchable electricity. For example, the Red Wing plant burns RDF from the Ramsey and Washington Counties' Solid Waste Program, as well as waste from other communities, and has a total capacity of 23 MW. The Mankato plant also burns RDF and annually incinerates approximately 2,800 pounds of pharmaceutical waste. Xcel's facilities are equipped with emissions control systems and have environmental monitoring programs in place to ensure compliance with environmental regulations.

### 1. Comments

In its initial IRP filing, Xcel included a plan to extend the lives of its RDF waste-to-energy generating plants in Red Wing and Mankato to 2037.<sup>26</sup> The plants are currently slated to retire in 2027. Xcel stated that extension of these facilities was unintentionally omitted from settlement discussions, and the issue was therefore not addressed in the settlement agreement. Xcel requested that the Commission approve an extension of the Red Wing and Mankato facilities along with the settlement agreement.

Commenters were divided on this issue. Many commenters—including Blue Earth County, Ramsey/Washington Recycling & Energy Board, and Red Wing Area Chamber of Commerce, to name a few—supported extending the lives of the plants. They emphasized that the plants

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<sup>26</sup> Xcel also initially requested an extension of the French Island plant but withdrew that request because the plant is located in Wisconsin and regulated there.

generate dispatchable energy, reduce landfilling, promote recycling, provide environmental benefits, and employ local workers.

In contrast, the CEOs, Joint Commenters, and members of the public raised concerns about the air quality impacts of the facilities and stated that parties had not had an adequate opportunity to comment on possible RDF plant extensions. These commenters recommended postponing a decision on the issue until there was further record development.

Xcel disagreed that the record development and opportunity for comment were inadequate. Xcel stated that its RDF proposal was part of its initial IRP petition—including in the reference case and preferred plan modeling—and the ALJ held eight public meetings about the IRP at which Xcel discussed RDF facility extensions. Those interested in commenting on the issue had the opportunity to do so at the public hearings and during the IRP comment process, Xcel stated, and most commenters supported extending the life of the RDF facilities.

Xcel also disputed that closing the plants would be better for the environment because the most likely alternative would be to send the waste to landfills instead of burning it. Xcel stated that waste-to-energy is preferable to landfilling according to the Minnesota Pollution Control Agency's (MPCA) Waste Management Hierarchy. Landfilling the waste, according to Xcel, would result in a net increase in greenhouse gas emissions and would result in higher levels of per- and polyfluoroalkyl substances (PFAS) in the environment.

Finally, Xcel emphasized the benefits the RDF facilities provide to their host communities and to the state by creating jobs, tax revenue, and by providing a lower-cost option for disposing of waste than delivering it to landfills. Xcel urged the Commission to approve an extension of these facilities along with the settlement agreement, especially since they are slated for retirement in 2027. According to Xcel, approving the extensions as part of this proceeding would impact resource planning and provide certainty for communities that rely on the facilities.

## **2. Commission Action**

The Commission is persuaded that operations at the Red Wing and Mankato RDF plants should be extended to 2037. The plants are firm dispatchable resources, which are important for system reliability, particularly as increasing amounts of intermittent solar and wind generation are added to the system. The plants also provide benefits to their host communities and the state and are a preferable alternative to landfilling according to the MPCA's Waste Management Hierarchy. The Commission agrees with Xcel that there have been adequate opportunities for stakeholders to comment on the proposal, and the vast majority of comments strongly supported extending the plants. Further, the Commission balances the need for reliability with impacts to ratepayers and the environment, and is persuaded that the most reasonable course of action based on the record is to extend the lives of the plants. For these reasons, the Commission will extend the lives of the Red Wing and Mankato RDF plants to 2037.

## **V. Additional Topics**

In this section, the Commission addresses topics that fall outside of the settlement agreement or were not fully addressed in it.

## **A. Data Centers**

### **1. Comments**

Anticipated new data centers prompted comments on the rate impacts of the facilities and how Xcel would manage the additional load. The OAG questioned whether expected data-center load would actually materialize and argued that there is a risk to ratepayers that Xcel will procure resources for data centers that will never be built. The OAG made various recommendations including opening an investigation into how ratepayers could be protected from an ultra-large customer load that fails to materialize.

Similarly, the DSP asserted that data centers could drive disproportionate costs for non-data-center customers. The DSP urged the Commission to investigate the implications of potential new data center load on cost allocation for new investments and ensure that such investments minimize or eliminate adverse impacts on the rest of the rate base.

The PIIC stated that it is critical to understand how Xcel will manage the new large loads. Accordingly, the PIIC recommended that Xcel be required to provide more detail on anticipated loads, including energy-intensive technologies, and how these new large loads will affect its energy system, including planned clean, renewable, and nuclear resources, in particular the PINGP.

### **2. Commission Action**

The Commission shares commenters' concerns about data-center-driven load growth. To more fully consider and address those concerns, the Commission will require Xcel to make a filing in a new docket with a proposal for development of a new rate class or sub-class and tariff for super-large customers. In the proposal, Xcel must describe how it will ensure continued achievement of affordability, reliability, and clean energy goals and standards. Specifically, the proposal must detail what combination of existing and new renewable or thermal energy resources, transmission (both high voltage alternating current and high voltage direct current), demand flexibility from super-large customers, demand response, and energy efficiency resources Xcel will use to serve the super-large class or sub-class. Xcel must also discuss how existing and future electric service agreements will be incorporated into a future rate case.

The initial proposed tariff must include the following nonexclusive factors:

- Ensure that all incremental costs attributable to super-large customers are assigned to the super-large class or sub-class.
- Provide electricity to the super-large class or sub-class that achieves each benchmark of the state's electricity standards under Minn. Stat. § 216B.1691.
- Include provisions to ensure that super-large customers financially commit to purchasing a certain level of electricity to protect non-super-large customers from the risk of stranded costs.
- Include provisions to ensure that all super-large customer-related incremental costs will be recovered over the life of the service agreement.
- Include provisions to ensure that, if the super-large customer ceases operations for any reason, all remaining financial commitments will still be paid.

## **B. Carbon-Free Electricity Procurement Program**

The U.S. General Services Administration (GSA) filed comments that emphasized the importance of carbon-free electricity (CFE) options, especially for customers with CFE goals. While not a signatory to the settlement agreement, GSA participated in settlement discussions, and the settling parties ultimately agreed “that the Commission authorize, but not require, the use of a Track 1 or Modified Track 2 bidding process to procure resources for carbon-free energy customer programs [...]”<sup>27</sup> GSA supported this provision—as well as the settlement agreement more broadly—and urged the Commission to approve it. Additionally, GSA recommended the Commission require Xcel to propose a voluntary CFE procurement program within the next several months to ensure customers are able to achieve their CFE goals on a defined timeline.

Parties broadly supported requiring Xcel to consider such a program, and the Commission agrees. Ratepayers, including those with CFE goals, could benefit from a voluntary CFE procurement program, and such a program is consistent with the state’s clean energy goals. The Commission will therefore direct Xcel to consult with the Department and consider filing a voluntary CFE procurement program that enables more customers to achieve annual CFE goals and increase hourly matching CFE levels.

## **C. Site Remediation and Collaboration with Host Communities**

Xcel and the Coalition of Utility Cities (CUC)<sup>28</sup> jointly filed a letter with a recommended framework for collaboration and communication between Xcel and communities impacted by the retirement of Sherco in Becker and the Allen S. King Plant in Oak Park Heights. Xcel and CUC recommended maintaining the general structure of a previously established framework with some minor changes and updates.

The Commission appreciates Xcel’s and the CUC’s efforts in reaching agreement on these issues. The closure of long-running facilities may have profound impacts on the local communities in which they operate. It is important that the communities remain informed about such closures, and the Commission will therefore approve the joint recommendation as detailed in the ordering paragraphs below.

## **D. Requirements for Xcel’s Next IRP**

Commenters suggested, and the settling parties agreed to, various requirements for Xcel’s next IRP. Parties broadly supported these requirements.

### **1. Settlement Agreement**

For Xcel’s next IRP, the settling parties agreed to the following.

- Xcel must file its next IRP within 24 months of this order.
- Xcel must include a discussion of clean firm progress including advanced modeling of clean firm resources and analysis of market trends and cost curves.

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<sup>27</sup> Settlement Agreement, p. 6.

<sup>28</sup> CUC is a membership organization of seven cities that host large, investor-owned power plants.

- Xcel must include a discussion of grid enhancing technologies and/or reconductoring investments and analysis about avoided transmission costs.
- In future IRPs, Xcel must provide a modeling sensitivity that caps the Lyon County Generating Station and its other gas peaking plants at no more than 5 percent annual capacity factor and that identifies any additional carbon-free resource additions (rather than market purchases) needed to meet capacity requirements in the modeling given the cap.

The Commission is persuaded that the timeline in the settlement agreement for Xcel's next IRP is appropriate and should be approved. Resource planning can change significantly in a relatively short amount of time, as it did in the present IRP docket with the substantially increased load forecast. A 24-month timeline for Xcel's next IRP will allow the Commission, Xcel, and stakeholders to consider appropriate changes to Xcel's resource planning based on the most up-to-date information and modeling.

The Commission will also adopt the other requirements from the settlement agreement related to Xcel's next and future IRPs. These discussions and modeling will be useful to the Commission and stakeholders in future proceedings.

## **2. Overall Modeling Approach**

The Department and the CEOs made recommendations on Xcel's overall modeling approach. The Department recommended requiring Xcel to submit EnCompass modeling and energy and demand forecasting inputs and outputs in a usable format with Xcel's next IRP filing. The data should be similar to that provided to the Department in response to information requests in this proceeding.

The Department also recommended that Xcel be required to perform a mixed integer programming (MIP) uncertainty analysis, if feasible. The Department noted that EnCompass uses MIP, a mathematical method, to show if there is any meaningful difference between two plans, and stated that it would be burdensome for the Department to perform such an analysis.

In initial comments, the CEOs observed that the maintenance schedule for Xcel's thermal units is heavily weighted toward September and October. Adjustments to the maintenance schedule, the CEOs stated, could help to mitigate the duration or size of Midcontinent Independent System Operator (MISO) market purchase events in the fall season. Accordingly, the CEOs recommended that the Commission require Xcel to examine in its next IRP the impact of scheduled maintenance on energy adequacy and evaluate whether it is appropriate to adjust maintenance schedules to enhance reliability or moderate market exposure.

The Department's and the CEOs' recommendations, which Xcel also supports, are reasonable and will help inform the Commission's decision in Xcel's next IRP. The Commission will therefore adopt these recommendations.

## **3. Energy Efficiency**

In its initial comments, the Department stated its preference that Xcel's IRP contain enough first-year savings to meet the ECO minimum 1.75% annual energy savings requirement for all years of the planning period (i.e., 2024–2040). According to the Department, Xcel's IRP does not meet

the minimum ECO 1.75% savings goal because it does not include new first-year savings in years 2036–2040. To address this issue, the Department recommended requiring Xcel, in its next IRP, to include the minimum first-year energy savings for each year of the planning period.

Xcel supported the Department’s recommendation but also stated that it included the energy efficiency savings through the entire planning period in the present IRP. Xcel observed that, starting in 2036, it netted energy efficiency savings from the sales forecast instead of including the data in Bundle 1.<sup>29</sup>

The Commission agrees with the Department that Xcel should show that its next IRP meets the 1.75% savings goal for the entire planning period. Accordingly, the Commission will require Xcel, in its next IRP, to include in its energy efficiency bundles at least the ECO-required minimum first-year energy savings for each year of the planning period.

Also, as discussed above, naturally occurring energy efficiency will not count toward Xcel’s energy savings goals or requirements.

#### **4. Workforce and Equity Reporting**

To monitor and advance Xcel’s equity-related efforts, the Commission will require Xcel to do the following:

- Xcel must annually report information about the demographic makeup of its Minnesota workforce as outlined in Minn. Stat. § 216C.51 in dockets E-999/PR-25-97 and E-002/M-22-266. The annual report must be filed by March 15 of each year.

Where applicable, Xcel must include data in a spreadsheet (.xlsx) format. If Xcel files a PDF version of spreadsheet data, it must be filed as an attachment in a separate document instead of being merged with the main report. The Commission delegates authority to the Executive Secretary to work with stakeholders to update the reporting requirements consistent with decisions made in this and subsequent proceedings and as directed in Minn. Stat. § 216C.51.

- In its next IRP, Xcel must work with the Department to include a summary of the outcomes of existing energy efficiency and renewable energy adoption programs as it pertains to underrepresented groups.
- Ahead of its next IRP, Xcel must work with the Department to develop outreach to groups that historically have not participated in the IRP process.

#### **E. Compliance Filing**

Finally, the Commission will impose the following compliance requirement to ensure that the Commission and stakeholders are informed about actual outcomes as compared to Xcel’s forecasts and modeling.

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<sup>29</sup> Xcel created different “bundles” to model energy efficiency and demand response.

- Xcel must make a compliance filing in 2026 and each year thereafter in its most recent IRP docket, including at minimum the following information to the greatest extent practicable. Information on actual operations must cover the prior calendar year, or if a different timeframe is reported on, Xcel must explain why.
  - Actual system peak demand (MW) compared to the forecast in its most recently approved IRP.
  - Actual programmatic energy efficiency achievements (MWh) compared to planned achievements in its most recently approved IRP, annual energy savings achievements required by Minn. Stat. § 216B.241, and the annual energy savings approved in Xcel's most recent ECO plan.
  - Actual annual demand response capacity (MW) compared to planned demand response in its most recently approved IRP.
  - Actual installed generating capacity (MW) by generating resource type, compared to the generating capacity approved in the most recent IRP.
  - Accredited generating capacity (MW) by generating resource type, compared to the accredited and nameplate generating capacity approved in the most recent IRP.
  - Actual annual capacity factors of Xcel's generating resources compared to the capacity factors modeled in the most recently approved IRP.
  - Actual annual emissions by generating resource and for Xcel Minnesota, compared to emissions forecasted and/or modeled in the most recently approved IRP.
  - Actual annual market purchases (MWh) compared to market purchases forecasted or modeled in the most recently approved IRP.

Where Xcel Energy is not able to provide the required information, Xcel must explain why it is unable to do so. Where applicable, Xcel must include data in spreadsheet (.xlsx) format. If Xcel files a PDF version of spreadsheet data, it must be filed as an attachment in a separate document instead of being merged with the main report.

The Commission delegates authority to the Executive Secretary to determine the schedule for filings and update the reporting requirements list consistent with the decisions made in this and subsequent proceedings.

## ORDER

1. The Commission approves the settlement agreement filed on October 3, 2024, with modifications, subject to the following conditions.
  - a. While the Commission chooses the Lyon County Generating Station in this resource plan, in light of the potential litigation risk that would lead to additional delay, and to ensure participation of affected communities and robust record development, Xcel must file a certificate of need petition pursuant to Minn. Stat. § 216B.243 jointly with the site permit. The Commission approved settlement agreement can be used as material evidence to support the petition.
  - b. For all resources identified in the settlement agreement, costs must be capped at bid amounts as of October 2, 2024, unless Xcel demonstrates by substantial

evidence that additional costs were caused by events outside of Xcel's control and are otherwise prudent.

- c. Within 6 months of the in service of Lyon County Combustion Turbine or 30 days before the next rate case filing, whichever is sooner, Xcel must file comprehensive substantial evidence in support of the cost recovery of the Lyon County Combustion Turbine in Docket No. E-002/CN-23-212 and Docket No. E-002/RP-24-67.

#### Five-Year Action Plan

2. Xcel must pursue the acquisition of 3,200 MW of wind to be installed by a target date of end-of-year 2030. To the extent feasible, 2,800 MW of this wind must use the Minnesota Energy Connection transmission line submitted for a certificate of need and route permit in dockets E-002/CN-22-131 and E-002/TL-22-132.
3. Xcel must pursue the acquisition of 400 MW of solar to be installed by a target date of end-of-year 2030. To the extent feasible, all 400 MW must use the King Interconnection.
4. Xcel must pursue 600 MW of standalone storage to be installed by a target date of end-of-year 2030. To the extent feasible, 120 MW must use the Minnesota Energy Connection.
5. For planning purposes, Xcel must extend the life of Monticello Nuclear Generating Plant to 2050.
6. For planning purposes, Xcel must extend the life of the Prairie Island Nuclear Generating Plant Units 1 and 2 to 2053 and 2054, respectively.
7. Aside from the resources selected in the firm dispatchable docket, the Five-Year Action Plan does not include any size/type/timing decisions for new generic resources that could include combustion turbine gas plants, nor does it include any additional new gas generation with unconstrained carbon emissions.
8. In the event of changed circumstances that require additional resources beyond those identified in the Five-Year Action Plan, Xcel may file a petition with the Commission.

#### Resource Acquisition Process

9. For resources approved in the Five-Year Action Plan, Xcel must use the Track 1 bidding process when Northern States Power Company does not intend to bid, and the Modified Track 2 bidding process when Northern States Power Company does intend to bid.
10. The Commission authorizes, but does not require, Xcel to use the Track 1 or Modified Track 2 bidding process to procure resources for carbon-free energy customer programs. Xcel may procure such resources as part of a bidding process for resources identified in the Five-Year Action Plan or a separate acquisition process. In the petition requesting approval of a proposed resource acquisition, Xcel will discuss its approach to ensuring non-participating customers are not harmed or disadvantaged by procurement undertaken for voluntary customer programs.

## Firm Dispatchable Bids

11. The Commission approves selection of the Northern States Power Company bid for the new Lyon County Generating Station with updated pricing, as contained in Exhibit A of the settlement agreement, filed October 3, 2024, and with the carbon-free feasibility study, as written on page 4 of the settlement agreement.
12. The Commission approves selection of the Northern States Power Company bid for the Sherco four-hour battery energy storage system (BESS) with the updated pricing contained in Exhibit A of the settlement agreement.
13. The Commission approves selections of Onward Mankato Energy Center and BESS to proceed to the power purchase agreement (PPA) negotiation phase.
14. The Commission approves selection of Invenergy Cannon Falls Energy Center to proceed to the PPA negotiation phase.
15. The Commission approves selection of DESRI North Star Energy Storage bid to proceed to the PPA negotiation phase.
16. The Commission approves selection of the National Grid Renewables Development, LLC Plum Creek Wind + Storage bid to proceed to the PPA negotiation phase.
17. The Commission approves selection of the Invenergy Lake Wilson Solar + Storage bid to proceed to the PPA negotiation phase.
18. Northern States Power Company must submit the negotiated PPAs with each bidder that is a settling party to the Commission for approval within four months of this order, or must make a filing explaining why Northern States Power Company and the individual bidders have been unable to agree upon a final PPA. If more time is required to negotiate a PPA, Northern States Power Company must include in its filing an explanation and proposed timeline for finalizing the PPA. If Northern States Power Company makes a filing explaining the lack of agreement on a PPA and no intent to continue negotiations, the specific bidder that is a settling party must file any response and request for action within ten days. If an individual PPA is finalized substantially in advance of other PPAs, Xcel may file it for approval separately.
19. The evaluation of these non-utility bidders' projects PPAs as contemplated in the settlement agreement will include, but not be limited to, whether:
  - a. the prices and terms put ratepayers at risk for costs that are higher than bid or for benefits assumed in bids that do not materialize;
  - b. the agreements had terms which sufficiently protected ratepayers from risks associated with the non-deliverability of accredited capacity and/or energy from the project(s) as proposed;
  - c. the terms of any agreements that inappropriately shifted risk or unknown costs to ratepayers; and
  - d. the reasonableness of delay and cancellation provisions.

## DSM Resources

20. Xcel must achieve an average annual level of at least 580 GWh of programmatic energy savings.
21. Xcel must add 60–70 MW of incremental demand response resources, as reflected in its 2024 Preferred Plan. Xcel must propose measures to fulfill this requirement in an ECO Program modification and/or in a proposal filed with the Commission by October 31, 2025, or another time as established by the Executive Secretary.

## Thermal Battery Pilot

22. Xcel must continue exploring options for a thermal battery with Rondo Energy and must file a pilot proposal by December 31, 2025, or in the alternative, an explanation as to why a pilot proposal would not be reasonable. If Xcel proposes a pilot project with Rondo Energy, the project must be sufficiently large to provide learning opportunities for scalability of the thermal battery technology and potential for optimization of any renewable resources that provide energy for storage in the thermal battery.

## Distributed Capacity Procurement

23. Xcel must file a Distributed Capacity Procurement (DCP) proposal by October 3, 2025. The filing must include:
  - a. An evaluation of how the Distributed Capacity Procurement program could be used to improve equity.
  - b. A discussion of how the proposal impacts the Five-Year Action Plan approved in this order, how it impacts the IRP forecasted annual distributed generation solar additions, and whether the DCP could be used to advance compliance with the distributed solar energy standard.
  - c. An evaluation of a costs and benefits comparison between a utility-owned and managed DCP model and alternative models allowing participation from customer-owned and third-party-owned resources.
  - d. An evaluation of the labor standards utilized by Xcel and third-party solar installers.

## Equity and Labor

24. Xcel must continue working with interested stakeholders to assess current participation levels and barriers in energy efficiency programs and other energy savings opportunities for lowest income customers, and to consider options to support increased participation. Northern States Power Company must report on the results of these efforts in its next ECO plan filing.
25. Xcel must work with community, organized labor, and other interested stakeholders to use the implementation of Xcel's resource plan to expand career opportunities for populations that are currently underrepresented in energy sector employment.

- a. Where feasible, such efforts must include tracking employment of diverse and local workforce by Northern States Power Company, direct vendors, and subcontractors working on projects and programs authorized in the resource plan, comparable to tracking of use of local workforce that is currently required as a condition of site permits issued by the Commission.
  - b. Northern States Power Company must report on the results of these efforts in Xcel's next IRP filing.
26. Northern States Power Company must continue to work with parties representing organized labor to maximize socioeconomic benefits to customers and host communities by prioritizing creation of high-quality jobs and apprenticeship pathways for local workers in the implementation of projects and programs included in the resource plan, including distributed energy resources, consistent with Xcel's current process for acquiring transmission-scale resources.
27. Xcel must work with the Environmental Justice Advisory Board to better understand how to prioritize and incentivize investments and economic benefits for underserved communities.

#### Nuclear Resources

28. Xcel must provide a schedule of planned investments at its nuclear plants, with expenditure breakdowns by facility detailing when investments will occur and their purpose.
  - a. For near-term investments, Xcel must provide the requested information within 90 days of this order in Docket No. E-002/RP-24-67.
  - b. For long-term investments, Xcel must provide the information as part of Xcel's next IRP.
29. In its next IRP, Xcel must provide more detail regarding its actions to remove spent fuel from Prairie Island and a more current and realistic assessment of when the Department of Energy will begin removing spent nuclear fuel from Prairie Island.

#### Refuse-Derived Fuel (RDF) Plant Extensions

30. The Commission approves extending the life of the Red Wing RDF Plant to 2037.
31. The Commission approves extending the life of the Mankato RDF Plant to 2037.

#### Data Centers and Carbon-Free Electricity (CFE) Procurement Program

32. By July 16, 2025, Xcel must make a filing in a new docket with a proposal for development of a new rate class or sub-class and tariff for super-large customers. In the proposal, Xcel must describe how it will ensure continued achievement of affordability, reliability, and clean energy goals and standards. Specifically, the proposal must detail what combination of existing and new renewable or thermal energy resources, transmission (both high voltage alternating current and high voltage direct current), demand flexibility from super-large customers, demand response, and energy efficiency

resources Xcel will use to serve the super-large class or sub-class. Xcel must also discuss how existing and future electric service agreements will be incorporated into a future rate case.

The initial proposed tariff must include the following nonexclusive factors:

- Ensure that all incremental costs attributable to super-large customers are assigned to the super-large class or sub-class.
- Provide electricity to the super-large class or sub-class that achieves each benchmark of the state's electricity standards under Minn. Stat. § 216B.1691.
- Include provisions to ensure that super-large customers financially commit to purchasing a certain level of electricity to protect non-super-large customers from the risk of stranded costs.
- Include provisions to ensure that all super-large customer-related incremental costs will be recovered over the life of the service agreement.
- Include provisions to ensure that, if the super-large customer ceases operations for any reason, all remaining financial commitments will still be paid.

Xcel must consult with the Department and consider filing a voluntary carbon-free electricity procurement program that enables more customers to achieve annual CFE goals and increase hourly matching CFE levels.

33. In its next IRP, Xcel must provide more detail on anticipated new large loads (including energy-intensive technologies) and how these new large loads will affect its energy system, including planned clean, renewable, and nuclear resources, in particular the Prairie Island Nuclear Generating Plant.

#### Site Remediation and Collaboration with Host Communities

34. The Executive Secretary is authorized to continue the docket on remediation and decommissioning for the Sherco site, Docket No. E-002/M-22-263.

- a. Xcel must continue to conduct periodic stakeholder meetings regarding the site with interested parties including the city of Becker; adjacent cities and townships including Becker Township and the City of Monticello; Sherburne and Wright Counties; the Department of Commerce, the Department of Natural Resources, the Pollution Control Agency, the Center for Energy and Environment, the Clean Energy Organizations, the Energy Transition Office, and labor unions.
- b. Xcel must convene stakeholder meetings at least twice per year, unless otherwise agreed to by Xcel and the city of Becker.
- c. Following each stakeholder meeting, Xcel must file with the Commission any documents presented and/or shared with participants.

35. Xcel must file an annual report to the Commission in Docket No. E-002/M-22-263 detailing updates on the following:

- a. To the extent possible, a detailed description and timeline of any demolition, environmental clean-up, or similar work resulting from the retirement of any of the coal-fired units at the Sherco plant.
- b. Updates, as they become available, to the timeline, estimated costs, and steps necessary to remediate pollution at the Sherco site.
- c. A section detailing Xcel's efforts to ensure that plans for site remediation, economic development, or future development and maintenance of power generation, transmission, or distribution infrastructure are consistent with the community's long-range planning and vision. As part of these efforts, Xcel must inform the city of Becker, to the fullest extent possible, of the timing and scope of any planned generation, storage and/or transmission projects in and around Becker.
- d. A description of any ongoing efforts by Xcel to evaluate future uses for the plant site, any buffer property owned by Xcel, or any adjacent property, including a description of how Xcel is involving interested stakeholders in those efforts.
- e. An update to the Commission on the status of efforts to support the city's and region's economic development efforts, including—to the extent possible—specific projects and investments Xcel is assisting the city and region in attracting.
- f. A description of Xcel's efforts to work with local governments and other stakeholders to assess and account for local land use and planning impacts.
- g. Any other items the city of Becker and Xcel agree to include.
- h. If Xcel cannot obtain the necessary information at the time of each filing, Xcel must submit a detailed timeline on which it anticipates it will be able to provide the city and stakeholders with additional information.

36. The Executive Secretary is authorized to continue the docket on remediation and decommissioning for the King site, Docket No. E-002/M-22-264.

- a. Xcel must continue to conduct quarterly stakeholder meetings regarding the King site with interested parties including the city of Oak Park Heights, the city of Stillwater, the City of Bayport, Washington County, the Department of Commerce, the Department of Natural Resources, the Energy Transition Office, the Pollution Control Agency, the National Park Service, the Clean Energy Organizations, the Center for Energy and Environment, the Wild Rivers Conservancy, and labor unions.
- b. Stakeholder meetings must occur at least once per quarter, unless otherwise agreed to by Xcel and the city of Oak Park Heights.
- c. Following each stakeholder meeting, Xcel must file with the Commission any documents presented and/or shared with participants.

37. Xcel must file an annual report to the Commission in Docket No. E-002/M-22-264 detailing updates on the following:

- a. Any pertinent updates to decommissioning and demolition plans filed as part of this resource plan, pursuant to the requirements of Laws 2023, Chapter 60, Art. 12, Sec. 70, or any other relevant docket, including

Xcel's plans, estimated costs, and timelines to decommission and demolish the electric generation facility.

- b. Updates, as they become available, to the timeline, estimated costs, and steps necessary to remediate pollution at the King site.
- c. A section detailing Xcel's efforts to ensure that plans for economic development, or future development and maintenance of power generation, transmission, or distribution infrastructure are consistent with the community's long-range planning and vision. As part of these efforts, Xcel must inform the city of Oak Park Heights, to the fullest extent possible, of the timing and scope of any planned generation, storage and/or transmission projects in and around Oak Park Heights.
- d. A description of any ongoing efforts by Xcel to evaluate future uses for the plant site, any buffer property owned by Xcel, or any adjacent property, including a description of how Xcel is involving interested stakeholders in those efforts.
- e. An update to the Commission on the status of efforts to support the city's and region's economic development efforts, including—to the extent possible—specific projects and investments Xcel is assisting the city and region in attracting.
- f. A description of Xcel's efforts to work with local governments and other stakeholders to assess and account for local land use and planning impacts.
- g. Any other items the city of Oak Park Heights and Xcel agree to include.
- h. If Xcel cannot obtain the necessary information at the time of each filing, Xcel must submit a detailed timeline on which it anticipates it will be able to provide the city and stakeholders with additional information.

#### Requirements for Xcel's Next IRP

- 38. Xcel must file its next IRP within 24 months of this order.
- 39. In its next IRP, Xcel must include a discussion of clean firm progress including advanced modeling of clean firm resources and analysis of market trends and cost curves.
- 40. In its next IRP, Xcel must include a discussion of Grid Enhancing Technologies and/or reconductoring investments and analysis about avoided transmission costs.
- 41. In future IRPs, Xcel must provide a modeling sensitivity that caps the Lyon County Generating Station and its other gas peaking plants at no more than 5 percent annual capacity factor and that identifies any additional carbon-free resource additions (rather than market purchases) needed to meet capacity requirements in the modeling given the cap.
- 42. At the time the IRP is filed, Xcel must submit EnCompass modeling and energy and demand forecasting inputs and outputs in a usable format with its next IRP filing. The data should be similar to that provided to the Department in response to information requests in this proceeding.
- 43. In its next IRP, Xcel must perform a Mixed Integer Programming uncertainty analysis, if feasible.

44. In its next IRP, Xcel must examine the impact of scheduled maintenance on energy adequacy and evaluate whether it is appropriate to adjust maintenance schedules to enhance reliability or moderate market exposure.
45. In its next IRP, Xcel must include in its EE Bundles at least the ECO-required minimum first-year energy savings for each year of the planning period.
46. Naturally occurring energy efficiency must not count toward Xcel's achievement of energy savings goals or requirements.
47. Xcel must annually report information about the demographic makeup of its Minnesota workforce as outlined in Minn. Stat. § 216C.51 in dockets E-999/PR-25-97 and E-002/M-22-266. The annual report must be filed by March 15 of each year.

Where applicable, Xcel must include data in a spreadsheet (.xlsx) format. If Xcel files a PDF version of spreadsheet data, it must be filed as an attachment in a separate document instead of being merged with the main report. The Commission delegates authority to the Executive Secretary to work with stakeholders to update the reporting requirements consistent with decisions made in this and subsequent proceedings and as directed in Minn. Stat. § 216C.51.

48. In its next IRP, Xcel must work with the Department to include a summary of the outcomes of existing energy efficiency and renewable energy adoption programs as it pertains to underrepresented groups.
49. Ahead of its next IRP, Xcel must work with the Department to develop outreach to groups that historically have not participated in the IRP process.

#### Compliance Filing

50. Xcel Energy must make a compliance filing in 2026 and each year thereafter in its most recent IRP docket, including at minimum the following information to the greatest extent practicable. Information on actual operations must cover the prior calendar year, or if a different timeframe is reported on, Xcel must explain why.
  - a. Actual system peak demand (MW) compared to the forecast in its most recently approved IRP.
  - b. Actual programmatic energy efficiency achievements (MWh) compared to planned achievements in its most recently approved IRP, annual energy savings achievements required by Minn. Stat. § 216B.241, and the annual energy savings approved in Xcel's most recent ECO plan.
  - c. Actual annual demand response capacity (MW) compared to planned demand response in its most recently approved IRP.
  - d. Actual installed generating capacity (MW) by generating resource type, compared to the generating capacity approved in the most recent IRP.
  - e. Accredited generating capacity (MW) by generating resource type, compared to the accredited and nameplate generating capacity approved in the most recent IRP.

- f. Actual annual capacity factors of Xcel's generating resources compared to the capacity factors modeled in the most recently approved IRP.
- g. Actual annual emissions by generating resource and for Xcel Minnesota, compared to emissions forecasted and/or modeled in the most recently approved IRP.
- h. Actual annual market purchases (MWh) compared to market purchases forecasted or modeled in the most recently approved IRP.

Where Xcel is not able to provide the required information, it must explain why it is unable to do so. Where applicable, Xcel must include data in spreadsheet (.xlsx) format. If Xcel files a PDF version of spreadsheet data, it must be filed as an attachment in a separate document instead of being merged with the main report.

The Commission delegates authority to the Executive Secretary to determine the schedule for filings and update the reporting requirements list consistent with the decisions made in this and subsequent proceedings.

51. This order shall become effective immediately.

BY ORDER OF THE COMMISSION



Will Seuffert  
Executive Secretary



This document can be made available in alternative formats (e.g., large print or audio) by calling 651.296.0406 (voice). Persons with hearing or speech impairment may call using their preferred Telecommunications Relay Service or email [consumer.puc@state.mn.us](mailto:consumer.puc@state.mn.us) for assistance.

**CERTIFICATE OF SERVICE**

I, Anne Redmond, 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 APPROVING SETTLEMENT AGREEMENT WITH MODIFICATIONS**

Docket Number **E-002/RP-24-67; E-002/CN-23-212**

Dated this 21st day of April, 2025

/s/ Anne Redmond

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101	Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP		33 South Sixth St Ste 4200 Minneapolis MN, 55402 United States	Electronic Service		No	24-67
102	Travis	Morrison	travis.morrison@boisforte-nsn.gov	Bois Forte Band of Chippewa		Bois Forte Tribal Government 5344 Lakeshore Drive Nett Lake MN, 55772 United States	Electronic Service		No	24-67
103	David	Morrison, Sr.	david.morrison@boisforte-nsn.gov	Bois Forte Band of Chippewa		Bois Forte Tribal Government 5344 Lakeshore Drive Nett Lake MN, 55772 United States	Electronic Service		No	24-67
104	Evan	Mulholland	emulholland@mncenter.org	Minnesota Center for Environmental Advocacy		1919 University Ave W Ste 515 Saint Paul MN, 55101 United States	Electronic Service		No	24-67
105	Sonny	Myers	smyers@1854treatyauthority.org	1854 Treaty Authority		4428 Haines Rd	Electronic Service		No	24-67

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						Duluth MN, 55811-1524 United States				
106	Carl	Nelson	cnelson@mncee.org	Center for Energy and Environment		212 3rd Ave N Ste 560 Minneapolis MN, 55401 United States	Electronic Service		No	24-67
107	Deb	Nelson	dnelson@greenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	24-67
108	David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency		220 South Sixth Street Suite 1300 Minneapolis MN, 55402 United States	Electronic Service		No	24-67
109	Duane	Ninneman	duane@cureriver.org	Clean Up the River Environment		117 South 1st St Montevideo MN, 56265 United States	Electronic Service		No	24-67
110	Logan	O'Grady	logrady@mnseia.org	Minnesota Solar Energy Industries Association		2288 University Ave W St. Paul MN, 55114 United States	Electronic Service		No	24-67
111	Joseph	OBrien	joey.obrien@lowersioux.com			39527 Highway 1 Morton MN, 56270 United States	Electronic Service		No	24-67
112	Carol A.	Overland	overland@legalectric.org	Legalectric - Overland Law Office		1110 West Avenue Red Wing MN, 55066 United States	Electronic Service		No	24-67
113	Gregory	Padden	gpadden@greenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	24-67
114	Jessica	Palmer Denig	jessica.palmer-denig@state.mn.us	Office of Administrative Hearings		600 Robert St N PO Box 64620 St. Paul MN, 55164 United States	Electronic Service		Yes	24-67
115	Marsha	Parlow	mparlow@greenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	24-67
116	Priti	Patel	ppatel@greenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369-4718 United States	Electronic Service		No	24-67
117	Earl	Pendleton	earl.pendleton@lowersioux.com	Lower Sioux Indian Community		39527 Highway 1 Morton MN, 56270 United States	Electronic Service		No	24-67
118	Gordon	Pietsch	gpietsch@greenergy.com	Great River Energy		12300 Elm Creek Blvd. Maple Grove MN, 55369-4718 United States	Electronic Service		No	24-67

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
119	Joe	Plumer	joe.plumer@redlakenation.org	Red Lake Nation		15484 Migizi Drive Red Lake MN, 56671 United States	Electronic Service		No	24-67
120	Kevin	Pranis	kpranis@liunagroc.com	Laborers' District Council of MN and ND		81 E Little Canada Road St. Paul MN, 55117 United States	Electronic Service		No	24-67
121	Robert	Prescott	bob.prescott@lowersioux.com	Lower Sioux Indian Community		39527 Highway 1 Morton MN, 56270 United States	Electronic Service		No	24-67
122	Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General - Residential Utilities Division		1400 BRM Tower 445 Minnesota St St. Paul MN, 55101-2131 United States	Electronic Service		Yes	24-67
123	Kevin	Reuther	kreuther@mncenter.org	MN Center for Environmental Advocacy		26 E Exchange St, Ste 206 St. Paul MN, 55101-1667 United States	Electronic Service		No	24-67
124	Stephan	Roos	stephan.roos@state.mn.us	Minnesota Department of Agriculture		625 Robert St N Saint Paul MN, 55155-2538 United States	Electronic Service		No	24-67
125	Alan	Roy	alan.roy@whiteearth-nsn.gov	White Earth Nation		White Earth Tribal Headquarters 35500 Eagle View Road Ogema MN, 56569 United States	Electronic Service		No	24-67
126	Bill	Rudnicki	bill.rudnicki@shakopeedakota.org	Shakopee Mdewakanton Sioux Community		Shakopee Mdewakanton Sioux Community 2330 Sioux Trail NW Prior Lake MN, 55372 United States	Electronic Service		No	24-67
127	Nathaniel	Runke	nrunke@local49.org			611 28th St. NW Rochester MN, 55901 United States	Electronic Service		No	24-67
128	Zachary	Ruzycki	zruzycki@grenergy.com	Great River Energy		12300 Elm Creek Boulevard Maple Grove MN, 55369 United States	Electronic Service		No	24-67
129	Miranda	Sam	miranda.sam@lowersioux.com	Lower Sioux Indian Community		39527 Reservation Highway 1 PO Box 308 Morton MN, 56270 United States	Electronic Service		No	24-67
130	Adam	Savariego	adams@uppersiouxcommunity-nsn.gov	Upper Sioux Community		5722 Travers Lane PO Box 147 Granite Falls MN, 56241 United States	Electronic Service		No	24-67

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
131	Ronald J.	Schwartau	rschwartau@noblesce.com	Nobles Electric Cooperative		22636 U.S. Hwy. 59 Worthington MN, 56187 United States	Electronic Service		No	24-67
132	Christine	Schwartz	regulatory.records@xcelenergy.com	Xcel Energy		414 Nicollet Mall FL 7 Minneapolis MN, 55401-1993 United States	Electronic Service		No	24-67
133	Jessie	Seim	jessie.seim@piic.org	Prairie Island Indian Community		5636 Sturgeon Lake Rd Welch MN, 55089 United States	Electronic Service		No	24-67
134	Darrell	Seki, Sr.	dseki@redlakenation.org			15484 Migizi Drive Red Lake MN, 56671 United States	Electronic Service		No	24-67
135	Will	Seuffert	will.seuffert@state.mn.us	Public Utilities Commission		121 7th Pl E Ste 350 Saint Paul MN, 55101 United States	Electronic Service		Yes	24-67
136	Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates		7400 Lyndale Ave S Ste 190 Richfield MN, 55423 United States	Electronic Service		Yes	24-67
137	Joel	Smith	jsmith@mnchippewatribe.org	Minnesota Chippewa Tribe		PO Box 217 Cass Lake MN, 56633 United States	Electronic Service		No	24-67
138	Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.		76 W Kellogg Blvd St. Paul MN, 55102 United States	Electronic Service		No	24-67
139	Nizhoni	Smith	nizhoni.smith@lowersioux.com	Lower Sioux Indian Community		PO Box 308 39527 Reservation Highway 1 Morton MN, 56270 United States	Electronic Service		No	24-67
140	Roger	Smith, Sr.	rogermsmithsr@fdlrez.com			1720 Big Lake Road Cloquet MN, 55720 United States	Electronic Service		No	24-67
141	Beth	Soholt	bsoholt@cleangridalliance.org	Clean Grid Alliance		570 Asbury Street Suite 201 St. Paul MN, 55104 United States	Electronic Service		No	24-67
142	Marie	Spry	mariespry@grandportage.com			PO Box 428 Grand Portage MN, 55605 United States	Electronic Service		No	24-67
143	Michael	Stalberger	michael.stalberger@blueearthcountymn.gov	Blue Earth County		410 S 5th Street Mankato MN, 56001 United States	Electronic Service		No	24-67
144	LeRoy	Staples Fairbanks III	leroy.fairbanks@llojibwe.net	Leech Lake Band of Ojibwe		190 Sailstar Drive NW Cass Lake MN, 56633 United States	Electronic Service		No	24-67

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
145	Byron E.	Starns	byron.starns@stinson.com	STINSON LLP		50 S 6th St Ste 2600 Minneapolis MN, 55402 United States	Electronic Service		No	24-67
146	Mark	Strohfus	mstrohfus@greenergy.com	Great River Energy		12300 Elm Creek Boulevard Maple Grove MN, 55369-4718 United States	Electronic Service		No	24-67
147	James M	Strommen	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered		150 S 5th St Ste 700 Minneapolis MN, 55402 United States	Electronic Service		No	24-67
148	Samuel	Strong	sam.strong@redlakenation.org	Red Lake Nation		15484 Migizi Drive Red Lake MN, 56671 United States	Electronic Service		No	24-67
149	Timothy	Sullivan	tsullivan@whe.org	Wright Hennepin Coop. Electric Assn.		6800 Electric Drive PO Box 330 Rockford MN, 55373 United States	Electronic Service		No	24-67
150	David	Sunderman	daves@benco.org	BENCO (DUPLICATE)		PO Box 8 Mankato MN, 56002-0008 United States	Electronic Service		No	24-67
151	Eric	Swanson	eswanson@winthrop.com	Winthrop & Weinstine		225 S 6th St Ste 3500 Capella Tower Minneapolis MN, 55402-4629 United States	Electronic Service		No	24-67
152	Camille	Tanhoff	kamip@uppersiouxcommunity-nsn.gov	Upper Sioux Community		5722 Travers Lane PO BOX 147 Granite Falls MN, 56241 United States	Electronic Service		No	24-67
153	Tim	Thompson	tthompson@lrec.coop	Lake Region Electric Cooperative		PO Box 643 1401 South Broadway Pelican Rapids MN, 56572 United States	Electronic Service		No	24-67
154	Geoffrey	Tolley	geoff.tolley@gmail.com			855 Stanley Road Two Harbors MN, 55616-1176 United States	Electronic Service		No	24-67
155	Caralyn	Trutna	carrie@uppersiouxcommunity-nsn.gov	Upper Sioux Community		Upper Sioux Community P.O. Box 147 Granite Falls MN, 55372 United States	Electronic Service		No	24-67
156	Jackie	Van Norman	jkvannorman@greenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	24-67
157	Sam	Villella	sdvillella@gmail.com			10534 Alamo Street NE Blaine MN, 55449 United States	Electronic Service		No	24-67

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
158	Carla	Vita	carla.vita@state.mn.us	MN DEED		Great Northern Building 12th Floor 180 East Fifth Street St. Paul MN, 55101 United States	Electronic Service		No	24-67
159	Amelia	Vohs	avohs@mncenter.org	Minnesota Center for Environmental Advocacy		1919 University Avenue West Suite 515 St. Paul MN, 55104 United States	Electronic Service		No	24-67
160	Trent	Waite	twaite@greenergy.com			null null, null United States	Electronic Service		No	24-67
161	Heather	Westra	heather.westra@piic.org	Prairie Island Indian Community		5636 Sturgeon Lake Rd Welch MN, 55089 United States	Electronic Service		No	24-67
162	Steve	White	steve.white@llojibwe.net	Leech Lake Band of Ojibwe		190 Sailstar Drive NW Cass Lake MN, 56633 United States	Electronic Service		No	24-67
163	Cody	Whitebear	cody.whitebear@piic.org	Prairie Island Indian Community		5636 Sturgeon Lake Road Welch MN, 55089 United States	Electronic Service		No	24-67
164	John	Williams	jwilliams@greenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	24-67
165	Virgil	Wind	virgil.wind@millelacsband.com	Mille Lacs Band of Ojibwe		43408 Oodena Drive Onamia MN, 56359 United States	Electronic Service		No	24-67
166	Joseph	Windler	jwindler@winthrop.com	Winthrop & Weinstine		225 South Sixth Street, Suite 3500 Minneapolis MN, 55402 United States	Electronic Service		No	24-67
167	Laurie	York	laurie.york@whiteearth-nsn.gov	White Earth Reservation Business Committee		PO Box 418 White Earth MN, 56591 United States	Electronic Service		No	24-67
168	Curtis	Zaun	czaun@mnseia.org	MnSEIA		PO Box 8141 Saint Paul MN, 55108 United States	Electronic Service		No	24-67
169	Kurt	Zimmerman	kwz@ibew160.org	Local Union #160, IBEW		2909 Anthony Ln St Anthony Village MN, 55418-3238 United States	Electronic Service		No	24-67
170	Patrick	Zomer	pat.zomer@lawmoss.com	Moss & Barnett PA		150 S 5th St #1200 Minneapolis MN, 55402 United States	Electronic Service		No	24-67

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
1	Michael	Alpogianis	malpogianis@invenergy.com	Invenergy		1 South Wacker Drive Chicago IL, 60606 United States	Electronic Service		No	23-212Official CC Service List
2	Gary	Ambach	gambach@slipstreaminc.org	Slipstream, Inc.		8973 SW Village Loop Chanhassen MN, 55317 United States	Electronic Service		No	23-212Official CC Service List
3	Katherine	Arnold	katherine.arnold@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	23-212Official CC Service List
4	Susan	Arntz	sarntz@mankatomm.gov	City Of Mankato		P.O. Box 3368 Mankato MN, 56002-3368 United States	Electronic Service		No	23-212Official CC Service List
5	Mara	Ascheman	mara.k.ascheman@xcelenergy.com	Xcel Energy		414 Nicollet Mall Fl 5 Minneapolis MN, 55401 United States	Electronic Service		No	23-212Official CC Service List
6	Ryan	Barlow	ryan.barlow@lawmoss.com	Moss & Barnett, a Professional Association		150 South Fifth St #1200 Minneapolis MN, 55402 United States	Electronic Service		No	23-212Official CC Service List
7	Jessica L	Bayles	jessica.bayles@stoel.com	Stoel Rives LLP		1150 18th St NW Ste 325 Washington DC, 20036 United States	Electronic Service		No	23-212Official CC Service List
8	David	Bell	david.bell@state.mn.us		Department of Health	POB 64975 St. Paul MN, 55164 United States	Electronic Service		No	23-212Official CC Service List
9	David	Bender	dbender@earthjustice.org	Earthjustice		1001 G Street NW Suite 1000 Washington DC, 20001 United States	Electronic Service		No	23-212Official CC Service List
10	James J.	Bertrand	james.bertrand@stinson.com	STINSON LLP		50 S 6th St Ste 2600 Minneapolis MN, 55402 United States	Electronic Service		No	23-212Official CC Service List
11	Ingrid	Bjorklund	ibjorklund@avisenlegal.com	Avisen Legal		901 S. Marquette Ave. #1675 Minneapolis MN, 55402 United States	Electronic Service		No	23-212Official CC Service List
12	James	Canaday	james.canaday@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	Suite 1400 445 Minnesota St. St. Paul MN, 55101 United States	Electronic Service		No	23-212Official CC Service List
13	Thomas	Carlson	thomas.carlson@edf-re.com	EDF Renewable Energy		10 2nd St NE Ste. 400 Minneapolis MN, 55413 United States	Electronic Service		No	23-212Official CC Service List

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
14	Joey	Cherney	joey.cherney@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	445 Minnesota Street STE 1800 Saint Paul MN, 55101 United States	Electronic Service		No	23-212Official CC Service List
15	John	Coffman	john@johncoffman.net	AARP		871 Tuxedo Blvd. St. Louis MO, 63119-2044 United States	Electronic Service		No	23-212Official CC Service List
16	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	23-212Official CC Service List
17	Jean	Comstock	jean.comstock.dbcc@gmail.com	St. Paul 350		729 6th St E St. Paul MN, 55106 United States	Electronic Service		No	23-212Official CC Service List
18	George	Crocker	gwillc@nawo.org	North American Water Office		5093 Keats Avenue Lake Elmo MN, 55042 United States	Electronic Service		No	23-212Official CC Service List
19	James	Denniston	james.r.denniston@xcelenergy.com	Xcel Energy Services, Inc.		414 Nicollet Mall, 401-8 Minneapolis MN, 55401 United States	Electronic Service		No	23-212Official CC Service List
20	Ian M.	Dobson	ian.m.dobson@xcelenergy.com	Xcel Energy		414 Nicollet Mall, 401-8 Minneapolis MN, 55401 United States	Electronic Service		No	23-212Official CC Service List
21	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	23-212Official CC Service List
22	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		Yes	23-212Official CC Service List
23	J.	Drake Hamilton	hamilton@fresh-energy.org	Fresh Energy		408 St Peter St Ste 350 Saint Paul MN, 55101 United States	Electronic Service		No	23-212Official CC Service List
24	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	23-212Official CC Service List
25	Adam	Duininck	aduininck@ncsrcc.org	North Central States Regional Council of Carpenters		700 Olive Street St. Paul MN, 55130 United States	Electronic Service		No	23-212Official CC Service List
26	Brian	Edstrom	briane@cubminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota St Ste W1360 Saint Paul MN, 55101 United States	Electronic Service		No	23-212Official CC Service List

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
27	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	23-212Official CC Service List
28	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	23-212Official CC Service List
29	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	23-212Official CC Service List
30	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	23-212Official CC Service List
31	Mike	Fiterman	mikefiterman@libertydiversified.com		Liberty Diversified International	5600 N Highway 169 Minneapolis MN, 55428-3096 United States	Electronic Service		No	23-212Official CC Service List
32	Lucas	Franco	lfranco@liunagroc.com		LIUNA	81 Little Canada Rd E Little Canada MN, 55117 United States	Electronic Service		No	23-212Official CC Service List
33	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	23-212Official CC Service List
34	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	23-212Official CC Service List
35	Kim	Havey	kim.havey@minneapolismn.gov		City of Minneapolis	350 South 5th Street, Suite 315M Minneapolis MN, 55415 United States	Electronic Service		No	23-212Official CC Service List
36	Philip	Hayet	phayet@jkenn.com		J. Kennedy and Associates, Inc.	570 Colonial Park Drive Suite 305 Roswell GA, 30075-3770 United States	Electronic Service		No	23-212Official CC Service List
37	Adam	Heinen	aheinen@dakotaelectric.com		Dakota Electric Association	4300 220th St W Farmington MN, 55024 United States	Electronic Service		No	23-212Official CC Service List
38	Annette	Henkel	mui@mnutilityinvestors.org		Minnesota Utility Investors	413 Wacouta Street #230 St. Paul MN, 55101 United States	Electronic Service		No	23-212Official CC Service List
39	Kristin	Henry	kristin.henry@sierraclub.org		Sierra Club	2101 Webster St Ste 1300 Oakland CA,	Electronic Service		No	23-212Official CC

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						94612 United States				Service List
40	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	Yes	23-212Official CC Service List	
41	Michael	Hoppe	lu23@ibew23.org		Local Union 23, I.B.E.W.	445 Etna Street Ste. 61 St. Paul MN, 55106 United States	Electronic Service	No	23-212Official CC Service List	
42	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	23-212Official CC Service List	
43	Alan	Jenkins	aj@jenkinsatlaw.com		Jenkins at Law	2950 Yellowtail Ave. Marathon FL, 33050 United States	Electronic Service	No	23-212Official CC Service List	
44	Richard	Johnson	rick.johnson@lawmoss.com		Moss & Barnett	150 S. 5th Street Suite 1200 Minneapolis MN, 55402 United States	Electronic Service	No	23-212Official CC Service List	
45	Sarah	Johnson Phillips	sjphillips@stoel.com		Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis MN, 55402 United States	Electronic Service	No	23-212Official CC Service List	
46	William	Kenworthy	will@votesolar.org			1 South Dearborn St Ste 2000 Chicago IL, 60603 United States	Electronic Service	No	23-212Official CC Service List	
47	Samuel B.	Ketchum	sketchum@kennedy-graven.com		Kennedy & Graven, Chartered	150 S 5th St Ste 700 Minneapolis MN, 55402 United States	Electronic Service	No	23-212Official CC Service List	
48	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	23-212Official CC Service List	
49	Frank	Kohlasch	frank.kohlasch@state.mn.us		Minnesota Pollution Control Agency	520 Lafayette Rd N. St. Paul MN, 55155 United States	Electronic Service	No	23-212Official CC Service List	
50	Brian	Kolbinger	brian@beckertownship.org		Becker Township Board	PO Box 248 12165 Hancock St Becker MN, 55308 United States	Electronic Service	No	23-212Official CC Service List	
51	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	23-212Official CC Service List	
52	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	23-212Official CC Service List	

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
53	Kay	Kuhlmann	teri.swanson@ci.red-wing.mn.us	City Of Red Wing		315 West Fourth Street Red Wing MN, 55066 United States	Electronic Service		No	23-212Official CC Service List
54	Brenda	Kyle	bkyle@stpaulchamber.com	St. Paul Area Chamber of Commerce		401 N Robert Street Suite 150 St Paul MN, 55101 United States	Electronic Service		No	23-212Official CC Service List
55	Carmel	Laney	carmel.laney@stoel.com	Stoel Rives LLP		33 South Sixth Street Suite 4200 Minneapolis MN, 55402 United States	Electronic Service		No	23-212Official CC Service List
56	Peder	Larson	plarson@larkinhoffman.com	Larkin Hoffman Daly & Lindgren, Ltd.		8300 Norman Center Drive Suite 1000 Bloomington MN, 55437 United States	Electronic Service		No	23-212Official CC Service List
57	Amber	Lee	amber.lee@stoel.com	Stoel Rives LLP		33 S. 6th Street Suite 4200 Minneapolis MN, 55402 United States	Electronic Service		No	23-212Official CC Service List
58	Rachel	Leonard	rachel.leonard@ci.monticello.mn.us	City of Monticello		505 Walnut St Ste 1 Monticello MN, 55362 United States	Electronic Service		No	23-212Official CC Service List
59	Annie	Levenson Falk	annie@cubminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota Street, Suite W1360 St. Paul MN, 55101 United States	Electronic Service		No	23-212Official CC Service List
60	Alice	Madden	alice@communitypowermn.org	Community Power		2720 E 22nd St Minneapolis MN, 55406 United States	Electronic Service		No	23-212Official CC Service List
61	Kavita	Maini	kmaini@wi.rr.com	KM Energy Consulting, LLC		961 N Lost Woods Rd Oconomowoc WI, 53066 United States	Electronic Service		No	23-212Official CC Service List
62	Dawn S	Marsh	dawn_marshall@fws.gov	U.S. Fish & Wildlife Service		Minnesota-Wisconsin Field Offices 4101 American Blvd E Bloomington MN, 55425 United States	Electronic Service		No	23-212Official CC Service List
63	Emily	Marshall	emarshall@lourismarshall.com	Miller O'Brien Jensen, PA		120 S. 6th Street Suite 2400 Minneapolis MN, 55402 United States	Electronic Service		No	23-212Official CC Service List
64	Katherine	Marshall	katie_marshall@lawmoss.com	Moss & Barnett		150 S 5th St Ste 1200 Minneapolis MN, 55402 United States	Electronic Service		No	23-212Official CC Service List
65	Mary	Martinka	mary.a.martinka@xcelenergy.com	Xcel Energy Inc		414 Nicollet Mall 7th Floor Minneapolis MN, 55401 United States	Electronic Service		No	23-212Official CC Service List

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
66	Gregg	Mast	gmast@cleanenergymn.org	Clean Energy Economy Minnesota		4808 10th Avenue S Minneapolis MN, 55417 United States	Electronic Service		No	23-212Official CC Service List
67	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	23-212Official CC Service List
68	Erica	McConnell	emcconnell@elpc.org	Environmental Law & Policy Center		35 E. Wacker Drive, Suite 1600 Chicago IL, 60601 United States	Electronic Service		No	23-212Official CC Service List
69	Taylor	McNair	taylor@gridlab.org			668 Capp Street San Francisco CA, 94110 United States	Electronic Service		No	23-212Official CC Service List
70	Melanie	Mesko Lee	melanie.lee@burnsvillemn.gov	City of Burnsville		100 Civic Center Parkway Burnsville MN, 55337-3867 United States	Electronic Service		No	23-212Official CC Service List
71	Peder	Mewis	pmewis@cleangridalliance.org	Clean Grid Alliance		570 Asbury St. St. Paul MN, 55104 United States	Electronic Service		No	23-212Official CC Service List
72	Stacy	Miller	stacy.miller@minneapolismn.gov	City of Minneapolis		350 S. 5th Street Room M 301 Minneapolis MN, 55415 United States	Electronic Service		No	23-212Official CC Service List
73	Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP		33 South Sixth St Ste 4200 Minneapolis MN, 55402 United States	Electronic Service		No	23-212Official CC Service List
74	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	23-212Official CC Service List
75	Alan	Muller	alan@greendel.org	Energy & Environmental Consulting		1110 West Avenue Red Wing MN, 55066 United States	Electronic Service		No	23-212Official CC Service List
76	Carl	Nelson	cnelson@mncee.org	Center for Energy and Environment		212 3rd Ave N Ste 560 Minneapolis MN, 55401 United States	Electronic Service		No	23-212Official CC Service List
77	David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency		220 South Sixth Street Suite 1300 Minneapolis MN, 55402 United States	Electronic Service		No	23-212Official CC Service List
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	23-212Official CC Service List
79	Ric	O'Connell	ric@gridlab.org	GridLab		2120 University Ave Berkeley CA,	Electronic Service		No	23-212Official CC

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						94704 United States				Service List
80	Carol A.	Overland	overland@legalelectric.org	Legalelectric - Overland Law Office		1110 West Avenue Red Wing MN, 55066 United States	Electronic Service		No	23-212Official CC Service List
81	Jessica	Palmer Denig	jessica.palmer-denig@state.mn.us		Office of Administrative Hearings	600 Robert St N PO Box 64620 St. Paul MN, 55164 United States	Electronic Service		Yes	23-212Official CC Service List
82	J.	Porter	greg.porter@nngco.com	Northern Natural Gas Company		1111 South 103rd St Omaha NE, 68124 United States	Electronic Service		No	23-212Official CC Service List
83	Brian H.	Potts	brian.potts@huschblackwell.com	Husch Blackwell		33 E Main St Ste 300 Madison WI, 53703 United States	Electronic Service		No	23-212Official CC Service List
84	Kevin	Pranis	kpranis@liunagroc.com	Laborers' District Council of MN and ND		81 E Little Canada Road St. Paul MN, 55117 United States	Electronic Service		No	23-212Official CC Service List
85	Kurt	Rempe	krempe@nationalgridrenewables.com	National Grid Renewables Development, LLC		8400 Normandale Lake Blvd Suite 1200 Bloomington MN, 55437 United States	Electronic Service		No	23-212Official CC Service List
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	23-212Official CC Service List
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	23-212Official CC Service List
88	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	23-212Official CC Service List
89	Nathaniel	Runke	nrunke@local49.org			611 28th St. NW Rochester MN, 55901 United States	Electronic Service		No	23-212Official CC Service List
90	Joseph L.	Sathe	jsathe@kennedy-graven.com	Kennedy & Graven, Chartered		150 S 5th St Ste 700 Minneapolis MN, 55402 United States	Electronic Service		No	23-212Official CC Service List
91	Richard J.	Savelkoul	rsavelkoul@martinsquires.com	Martin & Squires, PA		332 Minnesota St Ste W2750 St. Paul MN, 55101 United States	Electronic Service		No	23-212Official CC Service List
92	Jeff	Schneider	jeff.schneider@ci.red-wing.mn.us	City of Red Wing		315 West 4th Street Red Wing MN, 55066 United States	Electronic Service		No	23-212Official CC Service List

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
93	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	23-212Official CC Service List
94	Christine	Schwartz	regulatory.records@xcelenergy.com	Xcel Energy		414 Nicollet Mall FL 7 Minneapolis MN, 55401-1993 United States	Electronic Service		No	23-212Official CC Service List
95	Douglas	Seaton	doug.seaton@umwlc.org		Upper Midwest Law Center	8421 Wayzata Blvd Ste 300 Golden Valley MN, 55426 United States	Electronic Service		No	23-212Official CC Service List
96	Will	Seuffert	will.seuffert@state.mn.us		Public Utilities Commission	121 7th Pl E Ste 350 Saint Paul MN, 55101 United States	Electronic Service		Yes	23-212Official CC Service List
97	Janet	Shaddix Elling	jshaddix@janetshaddix.com		Shaddix And Associates	7400 Lyndale Ave S Ste 190 Richfield MN, 55423 United States	Electronic Service		Yes	23-212Official CC Service List
98	Andrew R.	Shedlock	andrew.shedlock@kutakrock.com	Kutak Rock LLP		60 South Sixth St Ste 3400 Minneapolis MN, 55402-4018 United States	Electronic Service		No	23-212Official CC Service List
99	Beth	Smith	bsmith@greatermankato.com		Greater Mankato Growth	1961 Premier Dr Ste 100 Mankato MN, 56001 United States	Electronic Service		No	23-212Official CC Service List
100	Joshua	Smith	joshua.smith@sierraclub.org			85 Second St FL 2 San Francisco CA, 94105 United States	Electronic Service		No	23-212Official CC Service List
101	Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.		76 W Kellogg Blvd St. Paul MN, 55102 United States	Electronic Service		No	23-212Official CC Service List
102	Beth	Soholt	bsoholt@cleangridalliance.org		Clean Grid Alliance	570 Asbury Street Suite 201 St. Paul MN, 55104 United States	Electronic Service		No	23-212Official CC Service List
103	Anna	Sommer	asommer@energyfuturesgroup.com		Energy Futures Group	PO Box 692 Canton NY, 13617 United States	Electronic Service		No	23-212Official CC Service List
104	Mark	Spurr	mspurr@fvbenergy.com		International District Energy Association	222 South Ninth St., Suite 825 Minneapolis MN, 55402 United States	Electronic Service		No	23-212Official CC Service List
105	Sean	Stalpes	sean.stalpes@state.mn.us		Public Utilities Commission	121 E. 7th Place, Suite 350 Saint Paul MN, 55101-2147 United States	Electronic Service		No	23-212Official CC Service List
106	Byron E.	Starns	byron.starns@stinson.com	STINSON LLP		50 S 6th St Ste 2600 Minneapolis	Electronic Service		No	23-212Official CC

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						MN, 55402 United States				Service List
107	James M	Strommen	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered		150 S 5th St Ste 700 Minneapolis MN, 55402 United States	Electronic Service	No	23-212Official CC Service List	
108	Eric	Swanson	eswanson@winthrop.com	Winthrop & Weinstine		225 S 6th St Ste 3500 Capella Tower Minneapolis MN, 55402-4629 United States	Electronic Service	No	23-212Official CC Service List	
109	Jayne	Trusty	execdir@swrdc.org	SWRDC		2401 Broadway Ave #1 Slayton MN, 56172 United States	Electronic Service	No	23-212Official CC Service List	
110	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	23-212Official CC Service List	
111	Carla	Vita	carla.vita@state.mn.us	MN DEED		Great Northern Building 12th Floor 180 East Fifth Street St. Paul MN, 55101 United States	Electronic Service	No	23-212Official CC Service List	
112	Julie	Voeck	julie.voeck@nee.com	NextEra Energy Resources, LLC		700 Universe Blvd Juno Beach FL, 33408 United States	Electronic Service	No	23-212Official CC Service List	
113	Amelia	Vohs	avohs@mncenter.org	Minnesota Center for Environmental Advocacy		1919 University Avenue West Suite 515 St. Paul MN, 55104 United States	Electronic Service	No	23-212Official CC Service List	
114	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	23-212Official CC Service List	
115	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	23-212Official CC Service List	
116	Laurie	Williams	laurie.williams@sierraclub.org	Sierra Club		Environmental Law Program 1536 Wynkoop St Ste 200 Denver CO, 80202 United States	Electronic Service	No	23-212Official CC Service List	
117	Joseph	Windler	jwindler@winthrop.com	Winthrop & Weinstine		225 South Sixth Street, Suite 3500 Minneapolis MN, 55402 United States	Electronic Service	No	23-212Official CC Service List	

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
118	Rob	Witwer	rob.witwer@onwardenergy.com	Onward Energy Holdings, LLC		767 Third Ave 17th Floor New York NY, 10017 United States	Electronic Service		No	23-212Official CC Service List
119	Jonathan	Wolfgram	jonathan.wolfgram@state.mn.us		Office of Pipeline Safety	445 Minnesota St Ste 147 Woodbury MN, 55125 United States	Electronic Service		No	23-212Official CC Service List
120	Tim	Wulling	t.wulling@earthlink.net			1495 Raymond Ave. Saint Paul MN, 55108 United States	Electronic Service		No	23-212Official CC Service List
121	Kurt	Zimmerman	kwz@ibew160.org		Local Union #160, IBEW	2909 Anthony Ln St Anthony Village MN, 55418-3238 United States	Electronic Service		No	23-212Official CC Service List
122	Emily	Ziring	eziring@stlouispark.org		City of St. Louis Park	5005 Minnetonka Blvd St. Louis Park MN, 55416 United States	Electronic Service		No	23-212Official CC Service List
123	Patrick	Zomer	pat.zomer@lawmoss.com		Moss & Barnett PA	150 S 5th St #1200 Minneapolis MN, 55402 United States	Electronic Service		No	23-212Official CC Service List
124	David	Zoppo	david.zoppo@huschblackwell.com		American Transmission Company LLC	33 East Main Street Suite 300 Madison WI, 53703 United States	Electronic Service		No	23-212Official CC Service List