

October 31, 2025

PUBLIC DOCUMENT

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

RE: **PUBLIC** Comments of the Minnesota Department of Commerce
Docket No. E002/CN-23-212, E002/RP-24-67, E002/M-24-195

Dear Ms. Bergman,

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

In the Matter of Northern States Power Company, doing business as Xcel Energy, Petition for Approval of PPAs for Firm Dispatchable Resources.

The Petition was filed by Northern States Power Company, d/b/a Xcel Energy on September 26, 2025.

The Department recommends **approval pending submission of additional data** and is available to answer any questions the Minnesota Public Utilities Commission may have.

Sincerely,

/s/ Dr. SYDNIE LIEB
Assistant Commissioner of Regulatory Analysis

SR/ar
Attachment

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Acronyms and Abbreviations

AME	Available Maximum Emergency
BESS	Battery Energy Storage System
CAF	Capacity Availability Factor
CFEC	Cannon Falls Energy Center
COD	Commercial Operation Date
Commission	Minnesota Public Utilities Commission
CPD	Critical Path Development
Department	Minnesota Department of Commerce
DESRI	DE Shaw Renewable Investments
ER	Environmental Report
Invenergy	Invenergy LLC
Lake Wilson	Lake Wilson Solar + Storage
MEC	Mankato Energy Center
MW	Megawatt
MWh	Megawatt-hour
National Grid	National Grid Renewables Development, LLC
North Star	North Star Energy Storage
Onward	Onward Energy Holdings, LLC
Order	Order Approving Settlement Agreement With Modifications
PPA	Power purchase agreement
PVRR	Present Value of Revenue Requirements
PVSC	Present Value of Societal Costs
PV	Photovoltaic
ROFO	Right of First Offer
Xcel or Company	Northern States Power Company d/b/a Xcel Energy

Definitions

Lyon County CN	Xcel's May 9, 2025 petition for a certificate of need for the Lyon County Generating Station; see Docket No. E002/CN-25-145.
Xcel Dec. 2024 Comment	Xcel's December 18, 2024 comments in support of the Settlement regarding the Company's resource plan and the short list for this proceeding; see Docket Nos. E002/CN-23-212, E002/RP-24-67.

Before the Minnesota Public Utilities Commission

PUBLIC Comments of the Minnesota Department of Commerce

Docket No. E002/CN-23-212, E002/RP-24-67, E002/M-24-195

I. INTRODUCTION

The Minnesota Public Utilities Commission's (Commission) April 21, 2025 *Order Approving Settlement Agreement with Modifications* at points 11 to 17 selected several projects for the short list in this proceeding.¹ The short-listed projects that involve power purchase agreements (PPA) are:

13. The Commission approves selections of Onward Mankato Energy Center and BESS [Battery Energy Storage System] 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.²

The Order also provided direction on items to be evaluated when the finalized PPAs were filed:

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.³

¹ *In the Matter of Xcel Energy's Competitive Resource Acquisition Process for up to 800 Megawatts of Firm Dispatchable Generation, Commission, Order Approving Settlement Agreement With Modifications*, April 21, 2021, Docket No. E002/M-23-212, (eDockets) [20254-217941-01](#). (hereinafter "Order")

² Order at 23.

³ *Ibid.*

Analyst(s) assigned: Diane Dietz, Donald Hirasuna, Taryn Waite, Steve Rakow

Finally, the Order included a cost cap provision for all resources:

1. The Commission approves the settlement agreement filed on October 3, 2024, with modifications, subject to the following conditions.
...
 - 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.⁴

A short description of the PPA projects on the Commission's short list is as follows:

Onward Energy Holdings, LLC's (Onward) Mankato Energy Center (MEC): Extend an existing PPA with Northern States Power Company d/b/a Xcel Energy (Xcel or the Company) for the output of its existing 375 megawatt (MW) natural gas combined cycle generating Unit 1 at the MEC. In addition to the MEC, the proposal would also install a 14 MW/56 megawatt-hour (MWh) BESS. Onward anticipates that the BESS component of the proposal would begin operation in 2028.⁵

Invenergy LLC's⁶ (Invenergy) Cannon Falls Energy Center (CFEC): Extend an existing PPA with Xcel for the output of its existing 357 MW CFEC. The CFEC consists of two dual-fuel simple cycle combustion turbines and has operated since 2008.⁷

DE Shaw Renewable Investments'⁸ (DESRI) North Star Energy Storage (North Star): a new 100 MW/400 MWh BESS, to be sited at the existing North Star Solar facility located in Chisago County, Minnesota.⁹ The project was initially proposed as an 80 MW facility. During negotiations, parties reached terms to increase the project size to 100 MW in exchange for a reduced per-unit cost.¹⁰ DESRI anticipates the North Star BESS project can be operational in 2027.¹¹

⁴ Order at 21-22. Note that the Order's points 1a and 1c are limited to addressing Xcel's proposed Lyon County Generating Station, which is not addressed here.

⁵ *In the Matter of Xcel Energy's Competitive Resource Acquisition Process for up to 800 Megawatts of Firm Dispatchable Generation*, Xcel, Petition, September 26, 2025, Docket No. E002/M-23-212, (eDockets) [20259-223366-02](#) at 25. (hereinafter "Petition").

⁶ Technically submitted by Invenergy's affiliate, Invenergy Cannon Falls LLC.

⁷ *In the Matter of Xcel Energy's Competitive Resource Acquisition Process for up to 800 Megawatts of Firm Dispatchable Generation*, Department, Environmental Report, November 25, 2024, Docket No. E002/M-23-212, (eDockets) [202411-212386-01](#) at 4. (hereinafter "ER").

⁸ Technically submitted by DESRI's affiliate, North Star Energy Storage LLC.

⁹ Petition at 28.

¹⁰ Petition at 27.

¹¹ ER at 2.

Analyst(s) assigned: Diane Dietz, Donald Hirasuna, Taryn Waite, Steve Rakow

National Grid Renewables Development, LLC's¹² (National Grid) Plum Creek Wind + Storage: a new 230 MW wind generating system and a 150 MW/600 MWh BESS. National Grid anticipated the Plum Creek Wind + BESS facility would begin operation in late 2028.¹³ Shortly after being shortlisted National Grid withdrew this project from further consideration.¹⁴

Invenergy's¹⁵ Lake Wilson Solar + Storage (Lake Wilson): a new 150 MW photovoltaic (PV) solar generating facility with an up to 95 MW/380 MWh BESS. Invenergy anticipates the Lake Wilson facility will begin operation in 2027.¹⁶

In the Petition Xcel submitted four PPAs for Commission approval—Onward's MEC and MEC BESS, Invenergy's CFEC, and DESRI's North Star.¹⁷ A PPA had not been finalized with Invenergy's Lake Wilson when the Petition was filed. Finally, note that the two Xcel self-build projects short-listed by the Commission are not at issue at this point in the process.¹⁸

In the Petition Xcel specifically requests that the Commission:

- approve the four PPAs;
- authorize Xcel to recover, through the Fuel Clause Rider, pursuant to Minn. Stat. § 216B.16 subd. 7(3), the Minnesota jurisdictional portion of the costs incurred under the PPAs; and
- establish a procedural schedule such that the Commission may complete deliberations by mid-January 2026.

II. PROCEDURAL BACKGROUND

April 21, 2025

The Commission issued the Order approving a settlement of Xcel's resource plan proceeding and a short list in Xcel's process to acquire 800 MW of firm dispatchable generation. The Order required negotiated PPAs be submitted within four months of the Order; additional time was possible if an explanation were filed.¹⁹

¹² Technically submitted by National Grid's affiliate, Plum Creek Wind Farm, LLC.

¹³ ER at 4.

¹⁴ *In the Matter of Xcel Energy's Competitive Resource Acquisition Process for up to 800 Megawatts of Firm Dispatchable Generation*, National Grid Renewables Development, *Letter*, April 25, 2025, Docket No. E002/M-23-212, (eDockets) [20254-218155-01](#).

¹⁵ Technically submitted by Invenergy's affiliate, Lake Wilson Solar Energy LLC.

¹⁶ ER at 4.

¹⁷ Petition at 2.

¹⁸ These two bids are for the Lyon County Generating Station and the Sherco four-hour BESS.

¹⁹ Order at 23.

Analyst(s) assigned: Diane Dietz, Donald Hirasuna, Taryn Waite, Steve Rakow

April 25, 2025	National Grid Renewables Development, LLC filed a letter stating that the Plum Creek Wind + Storage Project, which was on the approved short list, was being withdrawn.
August 20, 2025	Xcel filed a letter indicating that the Company anticipated submitting PPAs for all projects for Commission approval in mid-September 2025. ²⁰
September 26, 2025	Xcel filed the Petition requesting the Commission find the PPAs to be in the public interest and authorize the Company to recover costs through the Fuel Clause Rider.
October 2, 2025	The Commission issued its <i>Notice of Comment Period</i> . ²¹

According to the Notice the following topics are open for comment:

- Should the Commission approve the Invenergy Cannon Falls, Onward Mankato Energy Center, and DESRI North Star Energy power PPAs?
- How does each PPA perform on the factors listed in Order Point 19 subparts a-d of the Commission's April 21, 2025, Order in Docket Nos. E002/CN-23-212 and E002/RP-24-67?
- Is the Company's EnCompass modeling included in the Petition reasonable?
- Should the Commission authorize the Company to recover, through the Fuel Clause Rider, pursuant to Minn. Stat. § 216B.16 subd. 7(3)²², the Minnesota jurisdictional portion of the costs incurred under the agreements from Minnesota retail customers?
- Are there other issues or concerns related to this matter?

III. DEPARTMENT ANALYSIS

A. COMPLETENESS

The Commission's Rules define the Petition as a "miscellaneous filing" under Minn. R. 7829.0100, subp. 11 since no determination of Xcel's overall revenue requirement is necessary.²³ Minn. R. 7829.1300 subp. 3 contains the completeness requirements for miscellaneous filings including a one-paragraph summary of the filing, service requirements, and requirements for the content included in the filing.²⁴

²⁰ *In the Matter of Xcel Energy's Competitive Resource Acquisition Process for up to 800 Megawatts of Firm Dispatchable Generation*, Xcel, Letter, August 20, 2025, Docket No. E002/M-23-212, (eDockets) [20258-222271-01](#).

²¹ *In the Matter of Xcel Energy's Competitive Resource Acquisition Process for up to 800 Megawatts of Firm Dispatchable Generation*, Commission, Notice, October 2, 2025, Docket No. E002/M-23-212, (eDockets) [202510-223506-01](#). (hereinafter "Notice").

²² See [Minn. Stat. § 216B.16](#).

²³ See [Minn. R. 7829.0100](#).

²⁴ See [Minn. R. 7829.1300](#).

The Department reviewed the Petition for compliance with the completeness requirements. The Department concludes that the Petition is complete.

B. ENCOMPASS EVALUATION

B.1. Input Evaluation

In Tables 11 and 12 of the Petition Xcel shows its EnCompass analysis in four steps.²⁵ In the first step Xcel shows the present value of revenue requirements (PVRr) and present value of societal cost (PVSC) from the Lyon County CN in the rows labeled “Lyon Co CT CON” in Table 11.²⁶ Those EnCompass runs contain the then-known or “as bid” project costs. Note that the costs reported in Table 11 for these runs are the same as reported in Table 4-2 of the Lyon County CN. What is necessary in this step is to verify that the files Xcel provided that represent the “as bid” EnCompass runs have not changed. Otherwise, these EnCompass runs are not relied upon by Xcel.

The Department reviewed the files provided by Xcel for the first step and verified that the input files were the same, with two minor differences that would not impact the overall results. Thus, there are no issues with the first step.

In the second step Xcel modifies the Lyon County CN files to remove the now withdrawn Plum Creek project and adds the cost of the MEC BESS. This establishes an updated base case for comparison of the finalized PPAs. What is necessary in this step is to verify that

- the EnCompass runs remove Plum Creek;
- add the MEC BESS; and
- verify that the resulting PVRr/PVSC reported by Xcel is correct.

The Department reviewed the EnCompass files provided by Xcel for the second step and determined that Xcel:

[TRADE SECRET DATA HAS BEEN EXCISED]

The results of the Department’s EnCompass runs attempting to match Xcel’s reported outputs are discussed in section B.3. below. Note that Xcel structured the runs such that the Company is not using EnCompass as a capacity expansion model and re-optimizing the expansion plan. Instead, the model is structured such that Xcel is evaluating the incremental impact of the Company’s decisions during the negotiations process, compared to the system as it was planned and priced prior to negotiations.

²⁵ Petition at 34.

²⁶ *In the Matter of Xcel Energy’s Combined Application for a Certificate of Need, Site Permit, Transmission Line Route Permit, and a Pipeline Partial Exemption Route Permit for proposed Lyon County Generating Station Project in Lyon County in Minnesota*, Xcel, Certificate of Need Petition, May 9, 2025, Docket No. E002/CN-25-145, (eDockets) [20255-218749-02](#). (hereinafter “Lyon County CN”).

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In the third step Xcel takes the updated base case and writes over the costs of the PPAs in question with the final contracted costs. Xcel also increases the size of North Star BESS. This creates the change case. What is necessary in this step is to verify:

- the EnCompass runs include the correct, updated PPA costs;
- the EnCompass runs include the correct, updated North Star BESS size; and
- the resulting PVRR/PVSC reported by Xcel is correct.

The Department reviewed the EnCompass files provided by Xcel for the third step and determined that Xcel:

[TRADE SECRET DATA HAS BEEN EXCISED]

The results of the Department's EnCompass runs attempting to match Xcel's reported outputs are discussed in section B.3. . At this time there is no PPA for Lake Wilson so no comparison for the updated Lake Wilson inputs to PPA terms was possible. In addition, the Petition's Attachment E at Tables 1 and 2 **[TRADE SECRET DATA HAS BEEN EXCISED]**.

In the fourth step Xcel removes Lake Wilson from the step three files. This creates the change case without Lake Wilson and with the PPAs at issue at this time. What is necessary in this step is to verify that the EnCompass runs do not include Lake Wilson. The Department would also verify that the resulting PVRR/PVSC reported by Xcel is correct. Note that since no PPA with Lake Wilson has been filed, the Department drew no conclusions regarding Lake Wilson from Xcel's EnCompass inputs.

The Department reviewed the EnCompass files provided by Xcel for the fourth step and determined that Xcel **[TRADE SECRET DATA HAS BEEN EXCISED]** Again, the results of the Department's EnCompass runs attempting to match Xcel's reported outputs are discussed in section B.3. a below.

B.2. Output Evaluation

The Department reviewed the EnCompass output files provided by Xcel. This analysis was done by comparing the outputs from step two to step three and step three to step four.

The results of the comparison of step two's outputs to step three's outputs were that, at a system level, **[TRADE SECRET DATA HAS BEEN EXCISED]**.

The Department also performed a comparison of step two's outputs to step three's outputs at a unit level for the PPA projects at issue at this time. The results of the comparison were:

[TRADE SECRET DATA HAS BEEN EXCISED]

The results of the comparison of step three's outputs to step four's outputs were that **[TRADE SECRET DATA HAS BEEN EXCISED]**.

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B.3. Matching Runs

In the last step of the analysis, the Department used commands provided by Xcel to run EnCompass to match the Company's PVRR/PVSC results. To avoid potential errors due to different EnCompass versions on different machines, the Department opted to run EnCompass without changing the version currently installed. That meant using a different EnCompass version than Xcel.

The Department's EnCompass cost results were consistently two percent less than Xcel's across the scenarios of interest (Steps 2, 3, and 4 above). This two percent difference created a small change in cost difference between the various steps (e.g., Step 3 minus Step 2 to determine the incremental impact of the changes in the final portfolio). The Department investigated the two percent cost difference and concluded the difference was attributable to differences in the capital cost recovery routine. The Department concluded that Xcel's cost results present a reasonable estimate of the impact of changes during negotiations.

Table 11 of the Petition shows the incremental impact on PVRR/PVSC between the PPA bids as filed and the PPA bids as negotiated. The inputs for the MEC, MEC-BESS, CFEC, and North Star PPAs are as negotiated. A Lake Wilson PPA is not filed, thus the inputs must represent Xcel's understanding of the negotiations at a point in time. Table 12 of the Petition shows the incremental impact on PVRR/PVSC of the changes between the PPA bids as filed and the PPA bids as negotiated, but omitting Lake Wilson.

Considering all of the projects on the short list, Table 11 of the Petition shows the negotiations resulted in a PVRR increase of \$153 million in 30-year, NPV terms; the negotiations resulted in a PVSC increase of \$150 million in 30-year, NPV terms. Considering the PPAs filed (i.e., excluding Lake Wilson), Table 12 of the Petition shows the negotiations resulted in a PVRR decrease of \$103 million in 30-year, NPV terms. The negotiations resulted in a PVSC increase of \$33 million in 30-year, NPV terms.

B.4. EnCompass Conclusion

In summary, the Department reviewed Xcel's EnCompass inputs and outputs but, based on time available, did not develop alternative scenarios. Based upon that review the Department concludes that Xcel's EnCompass modeling represents a reasonable estimate of the incremental impact of changes made to the projects in question. Additionally, the projects were advanced to the negotiations phase by the Commission.

C. PRICING EVALUATION

The first issue listed in the Order's point 19 is if 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.²⁷ Also related to pricing is that the Order at point 1b stated that costs must be capped at bid amounts as of October 2, 2024. However, increases above the bid amount are allowed if Xcel demonstrates by substantial

²⁷ Order at 23.

Analyst(s) assigned: Diane Dietz, Donald Hirasuna, Taryn Waite, Steve Rakow

evidence that the added costs were caused by events outside of Xcel's control and are otherwise prudent.²⁸

C.1. Onward—MEC

The Department reviewed the MEC PPA in Attachment B and verified that the base costs and inflation rates shown in Attachment E are correct. The differences between the PPA and the bid as shown in Attachment E are:

[HIGHLY SENSITIVE TRADE SECRET DATA HAS BEEN EXCISED]

Xcel justifies the pricing changes through the MEC PPA improvements listed in Table 7. Xcel summarizes the MEC PPA improvements as “these improvements establish a comprehensive framework that protects our customers from the financial and reliability risks associated with non-deliverability of capacity and energy, while also aligning supplier incentives with system needs and regulatory expectations.”²⁹ The Department agrees with the Company that the PPA Term Improvements listed in the “Proposed PPA Extension” column are reflected in the terms of the MEC PPA in Attachment B and that, taken as a whole, the new terms reduce the risks presented by the MEC PPA.

C.2. Onward—MEC BESS

Xcel included a **[HIGHLY SENSITIVE TRADE SECRET DATA HAS BEEN EXCISED]** as part of the agreement with the MEC BESS.

[HIGHLY SENSITIVE TRADE SECRET DATA HAS BEEN EXCISED]

As part of the analysis the Department reviewed the MEC BESS agreement, the Commission's Order, Onward's proposal, and Xcel's comment that identifies updated blackstart services to meet Minnesota's renewable energy needs.³⁰

The PPA sets the contracted price for MEC BESS services at **[HIGHLY SENSITIVE TRADE SECRET DATA HAS BEEN EXCISED]** To pay the annual cost, **[HIGHLY SENSITIVE TRADE SECRET DATA HAS BEEN EXCISED]**.

²⁸ Order at 21-22.

²⁹ Petition at 21.

³⁰ Petition, Appendix C at 21. Order at 23. *In the Matter of Xcel Energy's Competitive Resource Acquisition Process for up to 800 Megawatts of Firm Dispatchable Generation*, Onward Energy Holdings, LLC, Proposal, May 24, 2024, Docket Nos. E002/CN-23-212 and E002/M-24-195 (eDockets) [20245-207118-01](#) at 22. (hereinafter “Onward Proposal”). *In the Matter of Xcel Energy's Competitive Resource Acquisition Process for up to 800 Megawatts of Firm Dispatchable Generation*, Xcel, Comments In Support of Settlement Agreement, Xcel, Reply Comments, December 18, 2024, Docket Nos. E002/CN-23-212 and E002/RP-24-67 (eDockets) [202412-213187-01](#) at 47 of Trade Secret version. (hereinafter “Xcel Dec. 2024 Comment”).

In addition to the payments described above, the PPA outlines several scenarios that might result in higher fees than stated in the proposal. These scenarios or contingencies include payments by Xcel for:

- **[HIGHLY SENSITIVE TRADE SECRET DATA HAS BEEN EXCISED]**

Assuming the benefit from the **[HIGHLY SENSITIVE TRADE SECRET DATA HAS BEEN EXCISED]**

Because the **[HIGHLY SENSITIVE TRADE SECRET DATA HAS BEEN EXCISED]**.

The Department finds that the fees are reasonable. Also, the Department confirmed that Xcel took steps to limit the increase in price due to several scenarios, including a change in tax law, or an increase in international tariff rates. Because the MEC BESS **[HIGHLY SENSITIVE TRADE SECRET DATA HAS BEEN EXCISED]** the Department does not have comparable prices and therefore cannot determine if Xcel might have an opportunity to further limit the risk of price increases.

The Department is uncertain whether it correctly described all the price terms with regard to the MEC BESS PPA because some terms refer back to the current PPA, which is not available. Because of this, the Department recommends that Xcel provide in reply comments any contract terms and prices that are in the existing PPA that are relevant to Order Point 19(a), but the terms were not in the Petition's Attachments B and C.

C.3. Invenergy—CFEC

The Department reviewed the PPA with Invenergy for the CFEC and verified that the base costs and inflation rates shown in Attachment E are correct. The differences between the PPA and the bid, as shown in Attachment E are as follows:

[TRADE SECRET DATA HAS BEEN EXCISED]

Xcel justifies the pricing changes through the Invenergy CFEC PPA improvements listed in Table 5.³¹ Xcel summarizes the Invenergy CFEC PPA improvements as:

Additional protections include improved security requirements, stronger performance standards, cost-sharing for changes in law, and the inclusion of a Right of First Offer (ROFO) ... Together, the Availability and ESC adjustment mechanisms, combined with restrictions on maintenance scheduling, create strong incentives for the facility to remain operational during elevated conditions. These provisions also support the Company's ability to qualify the resource for MISO's Available Maximum Emergency (AME) accreditation, thereby enhancing its value and reliability within the regional market.³²

³¹ Petition at 21.

³² Petition at 20.

Analyst(s) assigned: Diane Dietz, Donald Hirasuna, Taryn Waite, Steve Rakow

The Department agrees with Xcel that the PPA Term Improvements listed in the “Proposed PPA Extension” column are reflected in the terms of the Invenergy CFEC PPA in the Petition’s Attachment A and that, taken as a whole, the terms reduce the risks presented by the Invenergy CFEC PPA.

C.4. DESRI—North Star

The Department reviewed the North Star PPA in the Petition’s Attachment D and verified that the base costs shown in the Petition’s Attachment E are correct. As shown in the Petition’s Attachment E, base costs in the PPA do not exceed the bid costs; in fact, the PPA reduces costs below bid costs. The project was initially proposed as an 80 MW facility as reflected in the bid. As a result of further negotiations, the PPA provides terms for a larger 100 MW facility with a lower per-unit capacity price of **[TRADE SECRET DATA HAS BEEN EXCISED]** instead of the original **[TRADE SECRET DATA HAS BEEN EXCISED]**. The PPA includes a provision to reduce the facility’s nameplate capacity back to the original 80 MW, and adjust various other terms accordingly, if required by the Commission.³³

The North Star PPA includes one provision allowing for capacity price increases, due to ‘New Trade Measure Events.’³⁴ Such events can include changes to or introduction of new tariffs, duties, or import restrictions impacting the facility’s critical components.³⁵ However, increased capacity payment rates justified by these events cannot exceed **[TRADE SECRET DATA HAS BEEN EXCISED]** Proposals to increase rates due to new trade measure events must be evaluated by an independent auditor.³⁶ Xcel confirmed in response to the Office of the Attorney General (OAG) IR No. 13 that the Seller is responsible for the selection and payment of the independent auditor, but that the selection and scope of work must be mutually agreed to by the Seller and the Company.³⁷ In the same IR response, Xcel also stated that the Commission has the authority to place conditions on its approval of the PPA that would require the Company to request Commission approval to increase costs above a given soft cap. If the Commission chooses to place these conditions, then it could further protect ratepayers from risk of unreasonable cost increases.

The Department also reviewed provisions in the North Star PPA that introduce additional costs based on Xcel’s operation of the North Star BESS. One such provision pertains to excess throughput payments. The North Star PPA sets an annual throughput limit of **[TRADE SECRET DATA HAS BEEN EXCISED]** on the 100 MW facility.³⁸ Energy discharged in excess of this limit incurs an additional cost of **[TRADE SECRET DATA HAS BEEN EXCISED]**.

³³ Petition at 27 and Attachment D at 17-20.

³⁴ Petition at 31-32 and Attachment D at 50-53.

³⁵ Petition at 32.

³⁶ *Ibid.*

³⁷ See Attachment 1.

³⁸ Petition, Attachment D at A-2.

D. EVALUATION OF DELIVERABILITY PROTECTIONS

The second issue listed in the Order's point 19 is if 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.³⁹

D.1. Onward—MEC

The MEC PPA protects ratepayers from the non-deliverability of capacity **[HIGHLY SENSITIVE TRADE SECRET DATA HAS BEEN EXCISED]**.

The MEC PPA protects ratepayers from the non-deliverability of energy **[HIGHLY SENSITIVE TRADE SECRET DATA HAS BEEN EXCISED]**.

D.2. Onward—MEC BESS

Xcel's December 2024 comment notes the need for a **[HIGHLY SENSITIVE TRADE SECRET DATA HAS BEEN EXCISED]** which will incentivize reliability.

[HIGHLY SENSITIVE TRADE SECRET DATA HAS BEEN EXCISED]

D.3. Invenergy—CFEC

The Invenergy CFEC PPA protects ratepayers from non-deliverability of capacity **[TRADE SECRET DATA HAS BEEN EXCISED]**.

The Invenergy CFEC PPA protects ratepayers from the non-deliverability of energy **[TRADE SECRET DATA HAS BEEN EXCISED]** If performance falls below contractual thresholds – such as minimum capacity availability – the Company has the right to terminate the agreement and recover damages, including the right to purchase the facility at fair market value in the event of seller default. These provisions ensure that seller compensation directly align with actual delivery of accredited capacity and energy, thereby minimizing risk to Xcel's customers.⁴⁰

The Invenergy CFEC PPA protects ratepayers from the non-deliverability of energy **[TRADE SECRET DATA HAS BEEN EXCISED]**.

D.4. DESRI—North Star

The North Star PPA protects ratepayers from the non-deliverability of capacity and energy via the capacity availability factor (CAF). **[TRADE SECRET DATA HAS BEEN EXCISED]**.

³⁹ Order at 23.

⁴⁰ Petition at 36.

The North Star PPA also includes ratepayer protection from the non-deliverability of capacity due to variation in BESS round trip efficiency. If the facility's round-trip efficiency is found to be lower than the guaranteed value in the North Star PPA's Exhibit M-1, then a round-trip efficiency adjustment is used to reduce the capacity payment.⁴¹ This adjustment considers **[TRADE SECRET DATA HAS BEEN EXCISED]**.

E. RISK EVALUATION

The third issue listed in the Order's point 19 is if the terms of any agreements that inappropriately shifted risk or unknown costs to ratepayers.⁴²

E.1. Onward—MEC

The Department reviewed the MEC PPA and notes that there are several terms designed to protect ratepayers from unknown risks such as:

[HIGHLY SENSITIVE TRADE SECRET DATA HAS BEEN EXCISED]

E.2. Onward—MEC BESS

The Department notes that the MEC BESS PPA includes several parts that could result in cost shifting to Xcel's customers. Among the scenarios listed in the MEC BESS PPA are:

[HIGHLY SENSITIVE TRADE SECRET DATA HAS BEEN EXCISED]

All of these risks have been considered by Xcel as evidenced by their sections within the MEC BESS PPA and measures are taken to minimize the losses to Xcel and its customers. As outlined above the protections do not protect against more extreme outcomes, but the Department is uncertain whether better terms could have been negotiated with any other customer. Thus, the Department does not object to the terms in the MEC BESS PPA as it relates to cost shifting but does so with incomplete information.

E.3. Invenergy—CFEC

The Department reviewed the Invenergy CFEC PPA and found several provisions designed to protect ratepayers from unknown risks. **[TRADE SECRET DATA HAS BEEN EXCISED]**.

The Invenergy CFEC PPA reasonably protects Xcel's ratepayers from shifting risks and unknown costs.

⁴¹ Petition, Attachment D at 25.

⁴² Order at 23.

Analyst(s) assigned: Diane Dietz, Donald Hirasuna, Taryn Waite, Steve Rakow

E.4. DESRI—North Star

The Department reviewed the North Star PPA and found several provisions designed to protect ratepayers from risks and unknown costs. Since this project involves building a new BESS facility, construction delays and failure to meet COD are key risks in the PPA. These risks are handled by provisions analyzed in Section D.4 below. The delay and cancellation provisions provide sufficient protections including liquidated delay damages paid to Xcel in the event of a delay. **[TRADE SECRET DATA HAS BEEN EXCISED]**.

The Department finds that the PPA does not shift any significant risks or unknown costs to ratepayers, and that it includes sufficient provisions protecting ratepayers from risks and unknown costs.

F. EVALUATION OF TIMELINESS PROVISIONS

The fourth issue listed in the Order's point 19 is the reasonableness of delay and cancellation provisions.⁴³

F.1. Onward—MEC

MEC is a facility that currently exists. Therefore, there are no risks related to delay or cancellation of MEC due to construction or bringing the plant on-line. Instead, the risks are confined to a seller default, which could at least potentially lead to the contract's cancellation. The provisions related to seller default are:

[TRADE SECRET DATA HAS BEEN EXCISED]

The Department's review of these sections did not reveal any risks of note.

F.2. Onward—MEC BESS

[HIGHLY SENSITIVE TRADE SECRET DATA HAS BEEN EXCISED]

With these protections, the Department concludes that the MEC BESS PPA takes measures to secure Xcel's customers from the risk of delay. Since the Department has no comparisons of other contracts providing **[HIGHLY SENSITIVE TRADE SECRET DATA HAS BEEN EXCISED]** the Department has no objection to the protections against delay within the PPA.

F.3. Invenergy—CFEC

The proposed Invenergy CFEC PPA extends the existing off-take arrangement between Invenergy and Xcel Energy under a new PPA, incorporating modifications to the price and other terms relative to the Invenergy CFEC PPA.⁴⁴ Since the power plant is already in the ground, the Invenergy CFEC PPA does not

⁴³ Order at 23.

⁴⁴ Petition at 18-19.

Analyst(s) assigned: Diane Dietz, Donald Hirasuna, Taryn Waite, Steve Rakow

have risks related to delay and cancellation due to construction or bringing the plant on-line. The Invenergy CFEC PPA contains provisions related to seller default as follows:

[TRADE SECRET DATA HAS BEEN EXCISED]

The Department's review of the Invenergy CFEC PPA did not reveal any significant risks.

F.4. DESRI—North Star

The North Star PPA establishes a deadline for the commercial operation date (COD) of May 30, 2027. The North Star PPA also sets **[TRADE SECRET DATA HAS BEEN EXCISED]** Otherwise, if the Seller anticipates not meeting a CPD deadline or the COD, it must pay liquidated delay damages to Xcel of **[TRADE SECRET DATA HAS BEEN EXCISED]**.

The PPA also includes a cancellation provision regarding specified changes in tax law. These tax law changes, which can include a decrease in tax credits, may result in the Seller having the right to terminate the PPA.⁴⁵ However, before this right is granted, an independent auditor must confirm that the specified change in tax law has occurred, and the Company and Seller will have at least 90 days to negotiate terms to amend the PPA and facilitate its continuation. Xcel confirmed in its response to the OAG IR No. 14 that the Seller is responsible for the selection and payment of the independent auditor, but that the selection and scope of work must be mutually agreed to by the Seller and the Company.⁴⁶

Additional details on delay and cancellation provisions can be found in:

[TRADE SECRET DATA HAS BEEN EXCISED]

The Department's review of these sections did not reveal any risks of note. The Department finds that the delay and cancellation provisions in the PPA are reasonable.

G. SUMMARY OF EVALUATION

A summary of the Department's evaluation and an overall recommendation on each PPA is provided below.

G.1. Onward—MEC

The Department concludes that the capacity payment rate increases and additional charges are capped at reasonable levels, and that ratepayers are sufficiently protected from associated cost risks. Note that risks associated with project delay and cancellation are minimal for MEC.

⁴⁵ Petition, Attachment D at 68.

⁴⁶ See Attachment 1.

G.2. Onward—MEC BESS

The Department finds that MEC BESS PPA is compliant with regard two of the issues addressed by the Department and asks for more information for the remaining issues. The Department currently has no objection to the PPA's provisions of the MEC BESS regarding the shifting of costs to customers or the protections against delay. However, the Department does make recommendations for more documentation regarding provisions that might raise the price to customers and protections against default.

G.3. Invenenergy—CFEC

The Department has reviewed the Invenenergy CFEC PPA and found that the provisions of the PPA satisfactorily protect Xcel's ratepayers from the risks that comprise the evaluation criteria, for PPAs, established in the Commission's April 21, 2025 Order in Docket Nos. E002/CN-23-212 and E002/RP-24-67.

G.4. DESRI—North Star

The Department evaluated the North Star PPA using the criteria established in the Commission's April 21, 2025 Order in Docket Nos. E002/CN-23-212 and E002/RP-24-67. The Department finds that the PPA protects ratepayers from risks of costs higher than bid; pricing increases and additional charges are capped at reasonable levels. The PPA also has sufficient terms to ensure performance of the facility and protect ratepayers from paying for non-deliverable capacity. The PPA satisfactorily protects ratepayers from risks and unknown costs. Since the PPA involves constructing a new BESS facility, delay and cancellation provisions are a key component of the PPA. The Department finds that the PPA includes reasonable terms to enforce key deadlines as well as comprehensive seller default provisions.

H. IMPUTED DEBT

The Petition discusses the concept of imputed debt due to PPAs.⁴⁷ The Petition at Table 3 estimates the imputed debt due to the PPAs in question here to be about \$1.3 billion. After discussing imputed debt, the Petition concludes the topic by stating "Due to the material negative credit quality implications expected as a result of these contracts, the Company intends to propose mitigation through an increase in its equity ratio in its next electric rate case filing."⁴⁸

The Department acknowledges that an increase in the equity ratio to address imputed debt, if ultimately approved by the Commission, would represent an additional cost associated with the PPAs. However, imputed debt as an issue was known at the time the PPA projects were selected. In addition, at this time there is no specific cost of imputed debt nor is there evidence that the costs related to imputed debt are different now than when the PPA projects were moved to negotiations by the Commission. Finally, Xcel intends to address the issue in a separate proceeding.

⁴⁷ Petition at 15-16.

⁴⁸ Petition at 16.

Analyst(s) assigned: Diane Dietz, Donald Hirasuna, Taryn Waite, Steve Rakow

Based upon the above analysis, the Department concludes that potential costs of imputed debt do not impact the four decision factors specified in order point 19.⁴⁹ Therefore, the Department recommends the Commission take no action regarding imputed debt at this time.

I. COMMISSION NOTICE

I.1. Approve the PPAs?

According to the Notice the first topic open for comment is “Should the Commission approve the Invenergy Cannon Falls, Onward Mankato Energy Center, and DESRI North Star Energy power purchase agreements (PPAs)?”

The Department recommends that the Commission approve the Onward MEC, Invenergy CFEC and DESRI North Star PPAs. The Department also recommends the Commission approve the Onward MEC BESS PPA pending assessment of additional information requested from Xcel.

I.2. PPA Performance Under Commission Criteria

According to the Notice the second topic open for comment is “How does each PPA perform on the factors listed in Order Point 19 subparts a-d of the Commission’s April 21, 2025, Order in Docket Nos. E002/CN-23-212 and E002/RP-24-67?”

The Department’s analysis of each PPA under the factors listed in Order Point 19 subparts a-d of the Order is provided above.

I.3. EnCompass Modeling

According to the Notice the third topic open for comment is “Is the Company’s EnCompass modeling included in the Petition reasonable?”

As discussed above the Department reviewed Xcel’s EnCompass inputs and outputs. Based upon that review the Department concludes that Xcel’s EnCompass modeling presents a reasonable estimate of the incremental impact of changes made to the projects in question since the projects were advanced to the negotiations phase by the Commission.

I.4. Authorizing Fuel Clause Recovery

According to the Notice the fourth topic open for comment is “Should the Commission authorize the Company to recover, through the Fuel Clause Rider, pursuant to Minn. Stat. § 216B.16 subd. 7(3), the Minnesota jurisdictional portion of the costs incurred under the agreements from Minnesota retail customers?”

⁴⁹ Order at 23.

Analyst(s) assigned: Diane Dietz, Donald Hirasuna, Taryn Waite, Steve Rakow

Minn. Stat. § 216B.16 subd. 7(3) states that the Commission may permit a public utility to file rate schedules containing provisions for the automatic adjustment of charges for public utility service in direct relation to changes in ... costs for fuel used in generation of electricity.” Given the analysis of the PPAs above, the Department recommends that the Commission authorize the Company to recover the Minnesota jurisdictional portion of the costs incurred under the PPAs from Minnesota retail customers under Minn. Stat. § 216B.16.

I.5. Other Issues

According to the Notice the fifth topic open for comment is “Are there other issues or concerns related to this matter?”

The Department notes a request for Xcel to provide three items in reply comments. These are specified below. The Department has no other issues or concerns.

IV. DEPARTMENT RECOMMENDATIONS

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

C. PRICING EVALUATION

- C.2. The Department recommends that Xcel provide in reply comments any contract terms and prices that are in the existing PPA that are relevant to Order Point 19(a), but the terms were not in the Petition’s Attachments B and C.

D. EVALUATION OF DELIVERABILITY PROTECTIONS

- D.2. [HIGHLY SENSITIVE TRADE SECRET DATA HAS BEEN EXCISED]
- D.2. [HIGHLY SENSITIVE TRADE SECRET DATA HAS BEEN EXCISED]

H. IMPUTED DEBT

- The Department recommends the Commission take no action regarding imputed debt at this time.

Analyst(s) assigned: Diane Dietz, Donald Hirasuna, Taryn Waite, Steve Rakow

I. COMMISSION NOTICE

I.1. Approve the PPAs?

- The Department recommends that the Commission approve the Onward MEC, Invenergy CFEC and DESRI North Star PPAs. The Department also recommends the Commission approve the Onward MEC BESS PPA pending assessment of additional information requested from Xcel.

I.4. Authorizing Fuel Clause Recovery

- The Department recommends that the Commission authorize the Company to recover the Minnesota jurisdictional portion of the costs incurred under the PPAs from Minnesota retail customers under Minn. Stat. § 216B.16.

- ☐ Not-Public Document – Not For Public Disclosure
☐ Public Document – Not-Public Data Has Been Excised
☒ Public Document

Xcel Energy

Information Request No. 13

Docket No.: E-002/CN-23-212

Response To: Minnesota Office of the Attorney General

Requestor: Katherine Hinderlie

Date Received: October 14, 2025

Question:

References: Petition for Approval of PPAS for Firm Dispatchable Resources at 32.

C. New Trade Measure Event

If a new or modified import tariff is imposed on the project's major components, the Seller may request a rate increase, capped at no more than 20 percent, to account for the change in tariff impact on the project. Each new tariff and requested rate increase must be verified by an Independent Auditor. The Independent Auditor shall be granted the opportunity to review Seller's major equipment and determine the validity and impact of any new tariff. If the Independent Auditor denies the new tariff, or if Seller's calculation of the rate increase is determined by the Independent Auditor as materially inaccurate or otherwise in bad faith, no rate increase will be granted. The Seller has the right to submit multiple requests for different tariff events and is granted up to 75 days of COD delay during the review process. If the Independent Auditor verifies the new tariff event and also verifies Seller's calculation of the rate increase, then the rate increase will be automatically applied to the PPA for the remainder of the term.

Request:

- A. Confirm that this provision only applies to the North Star BESS and MEC BESS.
 1. If the provision applies to Cannon Falls or MEC I, explain why this provision is reasonable for existing generation facilities.
- B. For each project, state which party is responsible for payment of the Independent Auditor and where this responsibility is accounted for in the PPAs.
 1. If no provisions are provided in the PPA related to the payment of the Independent Auditor, state whether Xcel plans to execute an addendum

- or other agreement with Seller to memorialize any agreements related to payment.
2. If no provisions are provided in the PPA related to the payment of the Independent Auditor, state whether Xcel has discussed payment of the Independent Auditor by the Seller.
- C. For each project, explain how the Independent Auditor will be selected and where the selection process is described in the PPAs.
1. If no provisions are provided in the PPA related to the selection of the Independent Auditor, state whether Xcel plans to execute an addendum or other agreement with Seller to memorialize this process.
- D. Because the Independent Auditor has the ability to verify the Seller's calculation of the rate increase and that will be automatically applied, explain how the Commission can evaluate the PPA without the final price?
- E. Explain whether Xcel has performed modeling of North Star BESS and MEC BESS at a 20 percent rate increase for each project.
- F. If the answer to part E above is affirmative, provide the impact in Present Value Societal Costs (PVSC) and Present Value Revenue Requirement (PVRR) of a 20 percent price increase for each project.

Any responsive documents must be provided in their unlocked native format with all formulas and links intact.

Response:

- A. The Company confirms that the New Trade Measure Event provision only applies to North Star BESS and MEC BESS, and not to Cannon Falls or MEC I. An existing resource (like Cannon Falls and MEC I) would not be exposed to the same level of tariff risks.
1. N/A
- B. For each project, the seller is responsible for the payment of the Independent Auditor. This responsibility is accounted for in the definition of Independent Auditor in each agreement, where it is stated that the Independent Auditor "is selected and retained by Seller... at Seller's expense".
1. N/A
 2. N/A
- C. For each project, the Independent Auditor is selected by Seller to perform a scope of work that is mutually agreed to by both seller and the Company. Seller may select from Deloitte LLP, PricewaterhouseCoopers, Klynveld Peat

Marwick Goerdeler, or another firm that is mutually agreed upon by both seller and the Company. This selection procedure is described in the definition of Independent Auditor within each agreement.

1. N/A

- D. With respect to this contractual provision, the Commission has the authority and discretion to place conditions on approval that it deems are in the public interest, such as requiring a soft cost cap that allows the Company to return to the Commission for further approval of increased costs after demonstrating those costs are the result of government action.

Further, this approach aligns with Commission Orders in other similar matters. For example:

- October 25, 2023 Order, Docket No. E002/M-22-403, In the Matter of the Petition of Northern States Power Company, d/b/a Xcel Energy, for Approval of Sherco Solar 3 and Apple River Solar Power Purchase Agreement, Order Point 5a: *Authorize Xcel to request Commission approval to exceed the symmetrical cost-cap if it can show that any cost it incurred above the cap are the result of government action (e.g., tariff, trade investigation, etc.) that causes meaningful disruption to solar panel supplies and market prices, and*
- May 13, 2025 Order, Docket No. E015/M-24-344, In the Matter of the Petition of Minnesota Power for Approval of Investments and Expenditures in the Boswell Solar Projects for Recovery through Minnesota Power's Renewable Resources Rider under Minn. Stat. § 216B.1645, at Order Point 5: *The Commission authorizes Minnesota Power to request approval to exceed the cost cap if it can show that any costs incurred above the cap are the result of government action that causes meaningful disruption to solar panel supplies and market prices.*

- E. No, the Company did not perform modeling of North Star BESS and MEC BESS at a 20 percent rate increase for each project.

- F. N/A. Please see the response to Part E above.

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Date: October 24, 2025

- ☐ Not-Public Document – Not For Public Disclosure
☐ Public Document – Not-Public Data Has Been Excised
☒ Public Document

Xcel Energy Information Request No. 14
Docket No.: E-002/CN-23-212
Response To: Minnesota Office of the Attorney General
Requestor: Katherine Hinderlie
Date Received: October 14, 2025

Question:

References: Petition for Approval of PPAS for Firm Dispatchable Resources at 32.

A. Specified Change in Tax Law

If a change in tax law (for example, a repeal of a clean energy tax credit) prevents the Seller from realizing investment or production tax credit benefits, and the financial impact on the project exceeds a material threshold relative to the size of each project, then Seller has the opportunity to exit the contract, forfeiting a portion of their security. Prior to termination, both parties must engage in a 90-day negotiation period to amend the PPA in an effort to continue with the project prior to terminating. The Seller can be granted up to 75 days of COD delay during the process. Any such change in tax law triggering this relief is subject entirely to verification by an Independent Auditor

Request:

- A. Confirm that this provision only applies to the North Star BESS and MEC BESS.
1. If the provision applies to Cannon Falls or MEC I, explain why this provision is reasonable for existing generation facilities.
- B. For each project, state which party is responsible for payment of the Independent Auditor and where this responsibility is accounted for in the PPAs.
- C. For each project, explain how the Independent Auditor will be selected and where the selection process is described in the PPAs.
1. If no provisions are provided in the PPA related to the selection of the Independent Auditor, state whether Xcel plans to execute an addendum or other agreement with Seller to memorialize this process.

2. If no provisions are provided in the PPA related to the payment of the Independent Auditor, state whether Xcel has discussed payment of the Independent Auditor by the Seller.

Any responsive documents must be provided in their unlocked native format with all formulas and links intact.

Response:

- A. The Company confirms that the Specified Change in Tax Law provision only applies to North Star BESS and MEC BESS, and not to Cannon Falls or MEC I.
 1. N/A
- B. For each project, the seller is responsible for the payment of the Independent Auditor. This responsibility is accounted for in the definition of Independent Auditor in each agreement, where it is stated that the Independent Auditor “is selected and retained by Seller... at Seller’s expense.”
- C. For each project, the Independent Auditor is selected by Seller to perform a scope of work that is mutually agreed to by both seller and the Company. Seller may select from Deloitte LLP, PricewaterhouseCoopers, Klynveld Peat Marwick Goerdeler, or another firm that is mutually agreed upon by both seller and the Company. This selection procedure is described in the definition of Independent Auditor within each agreement.
 1. N/A
 2. N/A

Preparer: Matthew Trebesh
Title: Sr. Purchased Power Consultant
Department: Purchased Power
Telephone: (303) 285-6690
Date: October 24, 2025

CERTIFICATE OF SERVICE

I, Sharon Ferguson, hereby certify that I have this day, served copies of the following document on the attached list of persons by electronic filing, certified mail, e-mail, or by depositing a true and correct copy thereof properly enveloped with postage paid in the United States Mail at St. Paul, Minnesota.

**Minnesota Department of Commerce
Public Comments**

Docket No. E002/CN-23-212, E002/RP-24-67, and E002/M-24-195

Dated this 3rd day of **November 2025**

/s/Sharon Ferguson

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29	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
30	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
31	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
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39	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
40	Adam	Heinen	aheinen@dakotaelectric.com	Dakota Electric Association		4300 220th St W Farmington	Electronic Service		No	23-212Official

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43	Katherine	Hinderlie	katherine.hinderlie@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	445 Minnesota St Suite 1400 St. Paul MN, 55101-2134 United States	Electronic Service		No	23-212Official
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45	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
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55	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
56	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
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58	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
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64	Alice	Madden	alice@communitypowermn.org	Community Power		2720 E 22nd St Minneapolis MN, 55406 United States	Electronic Service		No	23-212Official
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66	Christine	Marquis	regulatory.records@xcelenergy.com	Xcel Energy		414 Nicollet Mall MN1180-07-MCA Minneapolis MN, 55401 United States	Electronic Service		No	23-212Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
67	Dawn S	Marsh	dawn_marsh@fws.gov	U.S. Fish & Wildlife Service		Minnesota-Wisconsin Field Offices 4101 American Blvd E Bloomington MN, 55425 United States	Electronic Service		No	23-212Official
68	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
69	Katherine	Marshall	katie.marshall@lawmoss.com	Moss & Barnett		150 S 5th St Ste 1200 Minneapolis MN, 55402 United States	Electronic Service		No	23-212Official
70	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
71	Gregg	Mast	gmast@cleanenergyeconomymn.org	Clean Energy Economy Minnesota		4808 10th Avenue S Minneapolis MN, 55417 United States	Electronic Service		No	23-212Official
72	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
73	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
74	Taylor	McNair	taylor@gridlab.org			668 Capp Street San Francisco CA, 94110 United States	Electronic Service		No	23-212Official
75	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
76	Peder	Mewis	pmewis@cleangridalliance.org	Clean Grid Alliance		570 Asbury St. St. Paul MN, 55104 United States	Electronic Service		No	23-212Official
77	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
78	David	Moeller	dmoeller@allete.com	Minnesota Power			Electronic Service		No	23-212Official
79	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
80	Evan	Mulholland	emulholland@mncenter.org	Minnesota Center for		1919 University Ave W Ste 515	Electronic Service		No	23-212Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
				Environmental Advocacy		Saint Paul MN, 55101 United States				
81	Alan	Muller	alan@greendel.org	Energy & Environmental Consulting		1110 West Avenue Red Wing MN, 55066 United States	Electronic Service		No	23-212Official
82	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
83	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
84	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
85	Ric	O'Connell	ric@gridlab.org	GridLab		2120 University Ave Berkeley CA, 94704 United States	Electronic Service		No	23-212Official
86	Carol A.	Overland	overland@legalelectric.org	Legalelectric - Overland Law Office		1110 West Avenue Red Wing MN, 55066 United States	Electronic Service		No	23-212Official
87	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		No	23-212Official
88	J.	Porter	greg.porter@nngco.com	Northern Natural Gas Company		1111 South 103rd St Omaha NE, 68124 United States	Electronic Service		No	23-212Official
89	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
90	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
91	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
92	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
93	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

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
94	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
95	Nathaniel	Runke	nrunke@local49.org			611 28th St. NW Rochester MN, 55901 United States	Electronic Service		No	23-212Official
96	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
97	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
98	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
99	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
100	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
101	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
102	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
103	Beth	Smith	bsmith@greatermankato.com	Greater Mankato Growth		1961 Premier Dr Ste 100 Mankato MN, 56001 United States	Electronic Service		No	23-212Official
104	Joshua	Smith	joshua.smith@sierraclub.org			85 Second St FL 2 San Francisco CA, 94105 United States	Electronic Service		No	23-212Official
105	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
106	Beth	Soholt	bsoholt@cleangridalliance.org	Clean Grid Alliance		570 Asbury Street Suite 201 St. Paul MN, 55104 United States	Electronic Service		No	23-212Official
107	Anna	Sommer	asommer@energyfuturesgroup.com	Energy Futures Group		PO Box 692 Canton NY, 13617 United States	Electronic Service		No	23-212Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
108	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
109	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
110	Byron E.	Starns	byron.starns@stinson.com	STINSON LLP		50 S 6th St Ste 2600 Minneapolis MN, 55402 United States	Electronic Service		No	23-212Official
111	Jayme	Trusty	execdir@swrdc.org	SWRDC		2401 Broadway Ave #1 Slayton MN, 56172 United States	Electronic Service		No	23-212Official
112	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
113	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
114	Julie	Voeck	julie.voeck@nee.com	NextEra Energy Resources, LLC		700 Universe Blvd Juno Beach FL, 33408 United States	Electronic Service		No	23-212Official
115	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
116	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
117	Julianna	Wei	julianna.wei@rondo.com	Rondo Energy, Inc.		1960 North Loop Alameda CA, 94502 United States	Electronic Service		No	23-212Official
118	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
119	Laurie	Williams	laurie.williams@sierraclub.org	Sierra Club		Environmental Law Program 1536 Wynkoop St Ste 200 Denver CO,	Electronic Service		No	23-212Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						80202 United States				
120	Joseph	Windler	jwindler@winthrop.com	Winthrop & Weinstine		225 South Sixth Street, Suite 3500 Minneapolis MN, 55402 United States	Electronic Service		No	23-212Official
121	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
122	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
123	Tim	Wulling	t.wulling@earthlink.net			1495 Raymond Ave. Saint Paul MN, 55108 United States	Electronic Service		No	23-212Official
124	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
125	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
126	Patrick	Zomer	pat.zomer@lawmoss.com	Moss & Barnett PA		150 S 5th St #1200 Minneapolis MN, 55402 United States	Electronic Service		No	23-212Official
127	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

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

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
1	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	24-195Official CC Service List
2	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	24-195Official CC Service List
3	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	24-195Official CC Service List
4	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		Yes	24-195Official CC Service List
5	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	24-195Official CC Service List
6	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	24-195Official CC Service List
7	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	24-195Official CC Service List
8	Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates		7400 Lyndale Ave S Ste 190 Richfield MN, 55423 United States	Electronic Service		Yes	24-195Official CC Service List

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
1	Steve	Albrecht	steve.albrecht@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
2	Jared	Alholinna	jaholinna@grenergy.com	Great River Energy		12300 Elm Creek Boulevard Maple Grove MN, 55369 United States	Electronic Service		No	24-67
3	Keith	Anderson	keith.anderson@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
4	Shannon	Anderson	sanderson@solarunitedneighbors.org	Solar United Neighbors			Electronic Service		No	24-67
5	Beren	Argetsinger	bargetsinger@keyesfox.com			PO BOX 166 Burdett NY, 14818 United States	Electronic Service		No	24-67
6	Ray	Auginaush, Sr.	ray.auginaush@whiteearth-nsn.gov	White Earth Nation		White Earth Tribal Headquarters 35500 Eagle View Road Ogema MN, 56569 United States	Electronic Service		No	24-67
7	Mark	Bakk	mbakk@lcp.coop	Lake Country Power		26039 Bear Ridge Drive Cohasset MN, 55721 United States	Electronic Service		No	24-67
8	Daniel	Becchetti	dbecchetti@grenergy.com	Great River Energy		12300 Elm Creek Boulevard Maple Grove MN, 55369 United States	Electronic Service		No	24-67
9	Todd	Beck	tbeck@grenergy.com			null null, null United States	Electronic Service		No	24-67
10	Amadeo	Bellino	amadeo.bellino@whiteearth-nsn.gov	White Earth Nation		White Earth Tribal Headquarters 35500 Eagle View Road Ogema MN, 56569 United States	Electronic Service		No	24-67
11	Melanie	Benjamin	melanie.benjamin@millelacsband.com			43408 Oodena Drive Onamia MN, 56359 United States	Electronic Service		No	24-67
12	Sasha	Bergman	sasha.bergman@state.mn.us		Public Utilities Commission		Electronic Service		No	24-67
13	Laura	Bishop	laura.bishop@state.mn.us		Minnesota Pollution Control Agency	520 Lafayette Rd Saint Paul MN, 55155 United States	Electronic Service		No	24-67
14	Ingrid	Bjorklund	ingrid@bjorklundlaw.com	Bjorklund Law, PLLC		855 Village Center Drive #256	Electronic Service		No	24-67

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						North Oaks MN, 55127 United States				
15	Hunter	Boldt	hunterboldt@redlakenation.org	Red Lake Nation		15484 Migizi Drive Red Lake MN, 56671 United States	Electronic Service		No	24-67
16	Peter	Boney	pboney@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
17	Sheldon	Boyd	sheldon.boyd@millelacsband.com	Mille Lacs Band of Ojibwe		43408 Oodena Drive Onamia MN, 56359 United States	Electronic Service		No	24-67
18	Jon	Brekke	jbrekke@greenergy.com	Great River Energy		12300 Elm Creek Boulevard Maple Grove MN, 55369-4718 United States	Electronic Service		No	24-67
19	Matthew	Brodin	mbrodin@allete.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	24-67
20	B. Andrew	Brown	brown.andrew@dorsey.com	Dorsey & Whitney LLP		Suite 1500 50 South Sixth Street Minneapolis MN, 55402-1498 United States	Electronic Service		No	24-67
21	Marvin Ray	Bruneau	marvin.bruneau@millelacsband.com	Mille Lacs Band of Ojibwe		43408 Oodena Drive Onamia MN, 56359 United States	Electronic Service		No	24-67
22	Christina	Brusven	cbrusven@fredlaw.com	Fredrikson Byron		60 S 6th St Ste 1500 Minneapolis MN, 55402-4400 United States	Electronic Service		No	24-67
23	Scott	Buchanan	scottbuchanan@fdlrez.com	Fond du Lac Band of Lake Superior Chippewa		1720 Big Lake Road Cloquet MN, 55720 United States	Electronic Service		No	24-67
24	Shelley	Buck	shelley.buck@piic.org	Prairie Island Indian Community		Prairie Island Indian Community 5636 Sturgeon Lake Road Welch MN, 55089 United States	Electronic Service		No	24-67
25	Robert	Budreau	robert.budreau@llojibwe.net	Leech Lake Band of Ojibwe		190 Sailstar Drive NW Cass Lake MN, 56633 United States	Electronic Service		No	24-67
26	Mike	Bull	mike.bull@state.mn.us		Public Utilities Commission	121 7th Place East, Suite 350 St. Paul MN,	Electronic Service		Yes	24-67

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						55101 United States				
27	Cathy	Chavers	cchavers@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
28	Marc	Child	mchild@grenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	24-67
29	Michael	Childs, Jr.	michael.childsjr@piic.org	Prairie Island Indian Community		Prairie Island Indian Community 5636 Sturgeon Lake Road Welch MN, 55089 United States	Electronic Service		No	24-67
30	John	Coffman	john@johncoffman.net	AARP		871 Tuxedo Blvd. St. Louis MO, 63119-2044 United States	Electronic Service		No	24-67
31	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	24-67
32	George	Crocker	gwillc@nawo.org	North American Water Office		5093 Keats Avenue Lake Elmo MN, 55042 United States	Electronic Service		No	24-67
33	Rebecca	Crooks Stratton	rebecca.crooks-stratton@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
34	Brooke	Cunningham	health.review@state.mn.us	Minnesota Department of Health		PO Box 64975 St. Paul MN, 55164-0975 United States	Electronic Service		No	24-67
35	Miyah	Danielson	miyahdanielson@fdlrez.com	Fond du Lac Band of Lake Superior Chippewa		1720 Big Lake Road Cloquet MN, 55720 United States	Electronic Service		No	24-67
36	Jason	Decker	jason.decker@llojibwe.net	Leech Lake Band of Ojibwe		190 Sailstar Drive NW Cass Lake MN, 56633 United States	Electronic Service		No	24-67
37	Bobby	Deschampe	robertdeschampe@grandportage.com	Grand Portage Band of Lake Superior Chippewa		PO Box 428 Grand Portage MN, 55605 United States	Electronic Service		No	24-67
38	Kami	Diver	kamidiver@fdlrez.com	Fond du Lac Band of Lake Superior Chippewa		1720 Big Lake Road Cloquet MN, 55720 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
39	Becky	Dobbs	bdobbs@grenergy.com			null null, null United States	Electronic Service		No	24-67
40	Ian M.	Dobson	ian.m.dobson@xcelenergy.com	Xcel Energy		414 Nicollet Mall, 401-8 Minneapolis MN, 55401 United States	Electronic Service		No	24-67
41	Shane	Drift	sdrift@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
42	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	24-67
43	Adam	Duininck	aduininck@ncsrcc.org	North Central States Regional Council of Carpenters		700 Olive Street St. Paul MN, 55130 United States	Electronic Service		No	24-67
44	Wally	Dupuis	wallydupuis@fdlband.org	Fond du Lac Band of Lake Superior Chippewa		1720 Big Lake Road Cloquet MN, 55720 United States	Electronic Service		No	24-67
45	Kevin	Dupuis, Sr.	kevindupuis@fdlrez.com			Reservation Business Committee 1720 Big Lake Rd Cloquet MN, 55720 United States	Electronic Service		No	24-67
46	Jamie	Edwards	jamie.edwards@millelacsband.com	Mille Lacs Band of Ojibwe		43408 Oodena Drive Onamia MN, 56358 United States	Electronic Service		No	24-67
47	Michael	Fairbanks	michael.fairbanks@whiteearth-nsn.gov	White Earth Reservation Business Committee		PO Box 418 White Earth MN, 56591 United States	Electronic Service		No	24-67
48	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	24-67
49	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	24-67
50	Terri	Finn	terri.goggleye@llojibwe.net			null null, null United States	Electronic Service		No	24-67
51	Christine	Fox	cfox@itasca-mantrap.com	Itasca-Mantrap Coop. Electric Assn.		PO Box 192 Park Rapids MN, 56470 United States	Electronic Service		No	24-67
52	Lucas	Franco	lfranco@liunagroc.com	LIUNA		81 Little Canada Rd E Little Canada MN, 55117 United States	Electronic Service		No	24-67

[illegible]

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
67	Ronald	Horman	rhorman@redwoodelectric.com	Redwood Electric Cooperative		60 Pine Street Clements MN, 56224 United States	Electronic Service		No	24-67
68	Robbie	Howe	robbie.howe@llojibwe.net	Leech Lake Band of Ojibwe		190 Sailstar Drive NW Cass Lake MN, 56633 United States	Electronic Service		No	24-67
69	John	Ihle	ljihle@rrt.net	PlainStates Energy LLC		27451 S Hwy 34 Barnesville MN, 56514 United States	Electronic Service		No	24-67
70	Annie	Jackson	cheryl.jackson@whiteearth-nsn.gov	White Earth Nation		White Earth Tribal Headquarters 35500 Eagle View Road Ogemo MN, 56569 United States	Electronic Service		No	24-67
71	Faron	Jackson, Sr.	faron.jackson@llojibwe.net			190 Sailstar Drive NW Cass Lake MN, 56633 United States	Electronic Service		No	24-67
72	Justin	Jahnz	justin.jahnz@ecemn.com	East Central Energy		412 Main Ave N Braham MN, 55006 United States	Electronic Service		No	24-67
73	Alan	Jenkins	aj@jenkinsatlaw.com	Jenkins at Law		2950 Yellowtail Ave. Marathon FL, 33050 United States	Electronic Service		No	24-67
74	Kevin	Jensvold	kevinj@uppersiouxcommunity-nsn.gov	Upper Sioux Community		PO Box 147 Granite Falls MN, 56241-0147 United States	Electronic Service		No	24-67
75	Annette	Johnson	annette.johnson@redlakenation.org	Red Lake Nation		15484 Migizi Drive Red Lake MN, 56671 United States	Electronic Service		No	24-67
76	Jody	Johnson	jody.johnson@piic.org	Prairie Island Indian Community		5636 Sturgeon Lake Rd Welch MN, 55089 United States	Electronic Service		No	24-67
77	Richard	Johnson	rick.johnson@lawmoss.com	Moss & Barnett		150 S. 5th Street Suite 1200 Minneapolis MN, 55402 United States	Electronic Service		No	24-67
78	Sarah	Johnson Phillips	sjphillips@stoel.com	Stoel Rives LLP		33 South Sixth Street Suite 4200 Minneapolis MN, 55402 United States	Electronic Service		No	24-67
79	Mark	Kaminski	mark.kaminski@gsa.gov	General Services Administration		1800 F Street NW Washington DC, 20405 United States	Electronic Service		No	24-67
80	Veda	Kanitz	vmkanitz@gmail.com			null null, null 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
81	Jenny	Kartes	jkartes@arrowhead.coop	Arrowhead Electric Cooperative, Inc.(P)		PO Box 39 5401 W Hwy 61 Lutsen MN, 55612 United States	Electronic Service		No	24-67
82	David	Kempf	dkempf@greenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	24-67
83	William	Kenworthy	will@votesolar.org			1 South Dearborn St Ste 2000 Chicago IL, 60603 United States	Electronic Service		No	24-67
84	Bobby	King	bking@solarunitedneighbors.org	Solar United Neighbors		3140 43rd Ave S Minneapolis MN, 55406 United States	Electronic Service		No	24-67
85	Therese	LaCanne	tlacanne@greenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	24-67
86	Matthew	Lacey	mlacey@greenergy.com	Great River Energy		12300 Elm Creek Boulevard Maple Grove MN, 55369-4718 United States	Electronic Service		No	24-67
87	Arthur	LaRose	arthur.larose@llojibwe.net	Leech Lake Band of Ojibwe		190 Sailstar Drive NW Cass Lake MN, 56633 United States	Electronic Service		No	24-67
88	Robert L	Larsen	robert.larsen@lowersioux.com	Lower Sioux Indian Community		PO Box 308 39527 Reservation Highway 1 Morton MN, 56270 United States	Electronic Service		No	24-67
89	Mark	Larson	mlarson@meeker.coop	Meeker Coop Light & Power Assn		1725 Highway 12 E Ste 100 Litchfield MN, 55355 United States	Electronic Service		No	24-67
90	Michelle	Larson	michelle@redwingchamber.com	Red Wing Area Chamber of Commerce		439 Main Street Red Wing, MN Bay Point Park MN, 55066 United States	Electronic Service		No	24-67
91	Peder	Larson	plarson@larkinhoffman.com	Larkin Hoffman Daly & Lindgren, Ltd.		8300 Norman Center Drive Suite 1000 Bloomington MN, 55437 United States	Electronic Service		No	24-67
92	Dan	Leshner	dlesher@greenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	24-67
93	Michelle	Lommel	mlommel@greenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 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
94	Kavita	Maini	kmairi@wi.rr.com	KM Energy Consulting, LLC		961 N Lost Woods Rd Oconomowoc WI, 53066 United States	Electronic Service		No	24-67
95	Christine	Marquis	regulatory.records@xcelenergy.com	Xcel Energy		414 Nicollet Mall MN1180-07-MCA Minneapolis MN, 55401 United States	Electronic Service		No	24-67
96	Shena	Matrious	shena.matrious@millelacsband.com	Mille Lacs Band of Ojibwe		43408 Oodena Drive Onamia MN, 56349 United States	Electronic Service		No	24-67
97	April	McCormick	aprilm@grandportage.com	Grand Portage Band of Lake Superior Chippewa		PO Box 428 Grand Portage MN, 55605 United States	Electronic Service		No	24-67
98	Ronald	Meier	rmeier@mcleodcoop.com	Mcleod Cooperative Power		3515 11th St East Glencoe MN, 55336 United States	Electronic Service		No	24-67
99	Peder	Mewis	pmewis@cleangridalliance.org	Clean Grid Alliance		570 Asbury St. St. Paul MN, 55104 United States	Electronic Service		No	24-67
100	Valentina	Mgeni	valentina.mgeni@piic.org	Prairie Island Indian Community		Prairie Island Indian Community 5636 Sturgeon Lake Road Welch MN, 55089 United States	Electronic Service		No	24-67
101	Cole W.	Miller	cole.miller@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
102	Stacy	Miller	stacy.miller@minneapolismn.gov	City of Minneapolis		350 S. 5th Street Room M 301 Minneapolis MN, 55415 United States	Electronic Service		No	24-67
103	David	Moeller	dmoeller@allete.com	Minnesota Power			Electronic Service		No	24-67
104	Sarah	Mooradian	sarah@curemn.org	CURE		117 South 1st Street Montevideo MN, 56265 United States	Electronic Service		No	24-67
105	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
106	Travis	Morrison	travis.morrison@boisforte-nsn.gov	Bois Forte Band of Chippewa		Bois Forte Tribal Government 5344 Lakeshore Drive Nett Lake	Electronic Service		No	24-67

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						MN, 55772 United States				
107	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
108	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
109	Sonny	Myers	smyers@1854treatyauthority.org	1854 Treaty Authority		4428 Haines Rd Duluth MN, 55811-1524 United States	Electronic Service		No	24-67
110	Pouya	Najmaie	najm0001@gmail.com	Cooperative Energy Futures		3416 16th Ave S Minneapolis MN, 55407 United States	Electronic Service		No	24-67
111	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
112	Deb	Nelson	dnelson@greenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	24-67
113	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
114	Duane	Ninneman	duane@cureriver.org	Clean Up the River Environment		117 South 1st St Montevideo MN, 56265 United States	Electronic Service		No	24-67
115	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
116	Joseph	OBrien	joey.obrien@lowersioux.com			39527 Highway 1 Morton MN, 56270 United States	Electronic Service		No	24-67
117	Carol A.	Overland	overland@legalectric.org	Legalelectric - Overland Law Office		1110 West Avenue Red Wing MN, 55066 United States	Electronic Service		No	24-67
118	Gregory	Padden	gpadden@greenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	24-67
119	Jessica	Palmer Denig	jessica.palmer-denig@state.mn.us		Office of Administrative Hearings	600 Robert St N PO Box 64620 St. Paul MN,	Electronic Service		Yes	24-67

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						55164 United States				
120	Marsha	Parlow	mparlow@grenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	24-67
121	Priti	Patel	ppatel@grenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369-4718 United States	Electronic Service		No	24-67
122	Earl	Pendleton	earl.pendleton@lowersioux.com	Lower Sioux Indian Community		39527 Highway 1 Morton MN, 56270 United States	Electronic Service		No	24-67
123	Gordon	Pietsch	gpietsch@grenergy.com	Great River Energy		12300 Elm Creek Blvd. Maple Grove MN, 55369-4718 United States	Electronic Service		No	24-67
124	Joe	Plumer	joe.plumer@redlakenation.org	Red Lake Nation		15484 Migizi Drive Red Lake MN, 56671 United States	Electronic Service		No	24-67
125	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
126	Robert	Prescott	bob.prescott@lowersioux.com	Lower Sioux Indian Community		39527 Highway 1 Morton MN, 56270 United States	Electronic Service		No	24-67
127	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
128	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
129	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
130	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
131	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

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
132	Nathaniel	Runke	nrunke@local49.org			611 28th St. NW Rochester MN, 55901 United States	Electronic Service		No	24-67
133	Zachary	Ruzycki	zruzycki@greenergy.com	Great River Energy		12300 Elm Creek Boulevard Maple Grove MN, 55369 United States	Electronic Service		No	24-67
134	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
135	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
136	Ronald J.	Schwartau	rschwartau@noblesce.com	Nobles Electric Cooperative		22636 U.S. Hwy. 59 Worthington MN, 56187 United States	Electronic Service		No	24-67
137	Jessie	Seim	jessie.seim@piic.org	Prairie Island Indian Community		5636 Sturgeon Lake Rd Welch MN, 55089 United States	Electronic Service		No	24-67
138	Darrell	Seki, Sr.	dseki@redlakenation.org			15484 Migizi Drive Red Lake MN, 56671 United States	Electronic Service		No	24-67
139	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
140	Joel	Smith	jsmith@mnchippewatribe.org	Minnesota Chippewa Tribe		PO Box 217 Cass Lake MN, 56633 United States	Electronic Service		No	24-67
141	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
142	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
143	Roger	Smith, Sr.	rogermsmithsr@fdlrez.com			1720 Big Lake Road Cloquet MN, 55720 United States	Electronic Service		No	24-67
144	Beth	Soholt	bsoholt@cleangridalliance.org	Clean Grid Alliance		570 Asbury Street Suite 201 St. Paul MN, 55104 United States	Electronic Service		No	24-67
145	Marie	Spry	mariespry@grandportage.com			PO Box 428 Grand	Electronic Service		No	24-67

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						Portage MN, 55605 United States				
146	Michael	Stalberger	michael.stalberger@blueearthcountymn.gov	Blue Earth County		410 S 5th Street Mankato MN, 56001 United States	Electronic Service		No	24-67
147	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
148	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
149	Mark	Strohfus	mstrohfus@grenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	24-67
150	Samuel	Strong	sam.strong@redlakenation.org	Red Lake Nation		15484 Migizi Drive Red Lake MN, 56671 United States	Electronic Service		No	24-67
151	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
152	David	Sunderman	daves@benco.org	BENCO (DUPLICATE)		PO Box 8 Mankato MN, 56002-0008 United States	Electronic Service		No	24-67
153	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
154	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
155	Geoffrey	Tolley	geoff.tolley@gmail.com			855 Stanley Road Two Harbors MN, 55616-1176 United States	Electronic Service		No	24-67
156	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
157	Jackie	Van Norman	jvannorman@grenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	24-67
158	Sam	Villella	sdvillella@gmail.com			10534 Alamo Street NE Blaine MN, 55449 United States	Electronic Service		No	24-67
159	Carla	Vita	carla.vita@state.mn.us	MN DEED		Great Northern	Electronic Service		No	24-67

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						Building 12th Floor 180 East Fifth Street St. Paul MN, 55101 United States				
160	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
161	Trent	Waite	twaite@grenergy.com			null null, null United States	Electronic Service		No	24-67
162	Heather	Westra	heather.westra@piic.org	Prairie Island Indian Community		5636 Sturgeon Lake Rd Welch MN, 55089 United States	Electronic Service		No	24-67
163	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
164	Cody	Whitebear	cody.whitebear@piic.org	Prairie Island Indian Community		5636 Sturgeon Lake Road Welch MN, 55089 United States	Electronic Service		No	24-67
165	John	Williams	jwilliams@grenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	24-67
166	Virgil	Wind	virgil.wind@millelacsband.com	Mille Lacs Band of Ojibwe		43408 Oodena Drive Onamia MN, 56359 United States	Electronic Service		No	24-67
167	Joseph	Windler	jwindler@winthrop.com	Winthrop & Weinstine		225 South Sixth Street, Suite 3500 Minneapolis MN, 55402 United States	Electronic Service		No	24-67
168	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
169	Curtis	Zaun	czaun@mnseia.org	MnSEIA		PO Box 8141 Saint Paul MN, 55108 United States	Electronic Service		No	24-67
170	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
171	Patrick	Zomer	pat.zomer@lawmoss.com	Moss & Barnett PA		150 S 5th St #1200 Minneapolis MN, 55402 United States	Electronic Service		No	24-67