

January 10, 2025

VIA E-FILING

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

Re: *In the Matter of the Application of Minnesota Power and Great River Energy for a Certificate of Need and Route Permit for the Northland Reliability Project 345 kV Transmission Line*
MPUC Docket Nos. E015,ET2/CN-22-416; E015,ET2/TL-22-415
Response to the Minnesota Public Utilities Commission's Request for Comments

Dear Mr. Seuffert:

Minnesota Power and Great River Energy (collectively, the "Applicants") provide these responses to the Minnesota Public Utilities Commission's ("Commission") December 23, 2024 Request for Comments ("Request"). The Applicants appreciate the time and attention dedicated to the important proceedings for the Northland Reliability Project ("Project").

I. CSAH 11 and Cole Lake Mississippi River Crossing under the Co-location Maximization Option.

- 1. Was there a consideration to commencing co-location North of Crow Wing CSAH 11 North of the Mississippi River to reduce the number of structures crossing the Mississippi River? If not, please explain why.**

The Applicants' proposed Cole Lake Way alternative was intended to reduce impacts to landowners in the area where the Applicants' original proposed route deviated from the existing transmission line corridor south of the Mississippi River and, therefore, Applicants did not originally consider beginning the co-location of existing transmission lines north of the Mississippi River.

- 2. Is it technically feasible to reduce the number of structures crossing the Mississippi River South of CSAH 11 so that it feeds into the suggested co-location South of the river through to the Riverton Substation? If not, please explain why.**

Yes. It is technically feasible to extend the proposed colocation of the existing 230 kV and 115 kV transmission lines north of the Mississippi River and Crow Wing CSAH 11 for approximately 1.41 miles. The Applicants note that, while this modification would reduce the total number of structures at this crossing of the Mississippi River and also reduce the total right-of-way width required by approximately 85 feet, it would not

reduce the number of wires crossing over the river and would result in taller structures for the combined 230 kV/115 kV double-circuit compared to the existing structures. A map of this proposed reconfiguration is provided in **Attachment 1**.

3. What would be the cost estimates for co-locating the facilities crossing the Mississippi River to keep it at two structures over the river?

Based on the Applicants' estimate of the additional length from the end of alignment alternative AA3 to a suitable location to begin co-location of the existing lines north of the Mississippi River and CSAH 11, the removal of the existing lines and construction of an additional 1.41 miles of 230 kV/115 kV double-circuit would add approximately \$5.88 million to the mid-range Project cost estimate.

II. Infeasibility of route alternatives E4 and E5

1. Identify in the record and provide a discussion of the definition of what would constitute an "identified residential displacement."

"Identified residential displacement" refers to private residences located within the designated right-of-way.¹ As stated in the Environmental Assessment ("EA"), typically, residences and other structures are not allowed within a transmission line's right-of-way for electrical safety code and maintenance reasons.² Any residences located within the designated right-of-way for new transmission lines are therefore generally subject to being removed or displaced.³ Notably, new transmission line rights-of-way have historically been routed to avoid requiring removal or displacement of residences.⁴ None of the routes proposed by the Applicants requires residential displacement. Route alternatives E4 and E5, however, were not proposed by the Applicants and do not appear to have been designed to avoid displacing residential structures.

¹ Applicants' November 21, 2023 EA Scoping Comments at 3 (Nov. 21, 2023) (eDocket No. [202311-200670-01](#)).

² EERA's September 5, 2024 Comments at 21 (Sep. 5, 2024) (eDocket No. [20249-210005-03](#)). The EA notes that there are three residences within the right-of-way of the Proposed Route in the Application. Applicants clarified that one of these residences is located in the Cole Lake-Riverton area, and two residences are located in Sherburne County. The residence in the Cole Lake-Riverton area will not be displaced by the Project because final alignment will be designed to be more than 75 feet from this residence. With respect to the residences in Sherburne County, the Applicants explained that these residences are within 75 feet of the existing GRE-BS line and were constructed after the existing transmission lines were built. The residences have been reviewed in connection with the existing transmission lines to ensure there are no safety, integrity, or compliance concerns, and Applicants stated that they do not anticipate displacement of these residences. Applicants' Comments on the EA and Additional Information Requested at Public Hearings at 2 (Aug. 5, 2024) (eDocket No. [20248-209266-01](#)).

³ *Id.*

⁴ For transmission lines capable of operating above 200 kV, Minnesota law does provide the option for a landowner to exercise their right to require a utility to "Buy-the-Farm." Unlike the scenarios in which a landowner chooses to move away from such projects, residential displacements do not necessarily give the landowners such a choice. Accordingly, in addition to the financial ramifications of displacements also create potentially substantial personal disruption for the affected landowners.

2. If one is not in the record, provide an explanation of how the applicants are defining a “identified residential displacement” used “for route alternatives E4 and E5.”

Based on desktop review, the Applicants previously identified three potential residences within the right-of-way (i.e., within 75 feet of the alignment) of route alternative E4 and route alternative E5. Since those prior comments, the Applicants conducted additional field review and analysis. Based on that review and analysis, and as reflected in **Attachment 2**, Structure A is a garage associated with a residence. Structure B is an accessory structure and the Applicants are unable to confirm whether this structure contains living quarters. Structure C is a residence. Structures A and B are on portions of parcels classified by Crow Wing County as “seasonal residential recreation.”

3. Provide a map for route alternatives E4 and E5 identifying the potentially displaced residences.

Attachment 2 depicts the three structures discussed in response to question II.2, above. **Attachment 2** also shows how route alternatives E4 and E5 cross directly over the Riverton Substation.⁵ These locations were also identified on Map 6-14 and Map 6-15 of the EA.

4. Provide a description of how the applicants would develop a cost range related to addressing displaced residences – assessed value multiplied by a factor, moving expenses, additional negotiation costs, legal expenses for eminent domain, etc.

The Applicants work diligently to identify routes for transmission line projects that avoid residential displacement; although displacement can increase costs, Applicants’ primary consideration in avoiding potential displacement is landowner impacts. The Applicants have not prepared a cost range in connection with potential displacement along route alternatives E4 or E5. Moreover, the Applicants generally do not develop cost ranges for specific potential acquisitions; performing such an analysis would not be done without first engaging with the landowners and conducting further study and analysis of relevant details, including feedback from the landowners about a property’s value and, in the case of displacement, relocation-related issues. This process of engaging with landowners may further involve engaging with third-party experts and consultants on issues of valuation and relocation assistance and benefits. Accordingly, the discussion below provides a general framework for the process that would be undertaken by the Applicants in the event the Commission ordered construction of a route that would result in displacement and identifies related considerations.

The land evaluation and acquisition process generally involves several key steps. These include conducting a title search, contacting the landowner, completing a survey, and preparing necessary real estate documents. The process also includes discussions and negotiations to finalize agreements. These agreements may encompass options,

⁵ See page 4.

permanent easements, temporary easements, or other arrangements required to facilitate the initial survey, meet the Project's needs, and support its construction, operation, and maintenance. As part of the land rights acquisition process, the Applicants' right-of-way agents will discuss the construction schedule and construction requirements with the owner of each parcel. Special considerations may be discussed, such as temporary or permanent gates, fencing, and access accommodations. Further, in the event of displacement, the right-of-way agents, other Applicants' representatives, and third-party consultants would likely be engaged to analyze the lands at issue, as well as the landowners' and/or tenants' particular circumstances, to provide a rational basis from which to begin discussions regarding the acquisitions, and relocation in the instance of displacement.

The Applicants did not propose route alternatives E4 and E5 and the fundamental steps (title search and initial contact with the landowner) necessary for acquisition have not been undertaken. Ultimately, two primary cost factors for any displacement would include payment for the real property and payment for relocation assistance. At this point, the Applicants have little information about the potentially-impacted properties' fair market values and no information about the potential relocation assistance for any of the properties at issue. The only information that Applicants have regarding values of these properties are those set by the County assessors using a mass appraisal process for tax purposes. In the acquisition process, these assessed values may or may not be considered as indicative of an appropriate amount for purposes of reaching agreements with landowners, but there is no indication these figures for the properties at issue are reliable for purposes of an acquisition for fair market value in 2025 or later. Nor is there a reliable factor to be applied to the County's assessed values to arrive at an acceptable fair market value.

In all cases, the Applicants would use fair market value data to try in good faith to reach agreements with landowners on a voluntary basis. In some cases, agreements cannot be reached. In those cases, the Applicants may be required to obtain the necessary rights for the Project by exercising their right of eminent domain under Minnesota law. The process of exercising the right of eminent domain is called condemnation. Before commencing a condemnation proceeding, typically a condemning authority obtains an appraisal and provides it to the property owner, along with the condemning authority's final offer of compensation. These steps are consistent for all property owners, whether or not there is displacement. Additional costs would be incurred as a result of the condemnation process. In addition, there would be costs associated with the relocation process. Where displacement and relocation are necessary, the negotiation process can require significant time and resources, even where a mutually-agreeable settlement is reached; the time and resources increase where condemnation is necessary.

5. Estimate the total cost of residential displacements impacted by E4 and E5.

As identified in response question II.4, there is not enough credible information available to establish an estimated fair market value for the property or the relocation-

related costs and expenses of the displacements that may result from route alternatives E4 and E5.

6. Provide in greater detail support for the applicants' assertion that "these route alternatives are not constructable as proposed."

Route alternatives E4 and E5 are not constructable as proposed because the route alternatives cross directly over the Riverton Substation and associated infrastructure without accounting for the modifications to the existing infrastructure that would also need to take place as a result of this proposed alignment.⁶ The Applicants previously provided discussion of the unique safety, reliability, and resiliency concerns created when high-voltage transmission lines, such as the proposed double-circuit 345 kV line, cross over other high-voltage transmission lines.⁷

The same issues are present when a transmission line crosses over a substation, only the issues are compounded. These issues are significantly more pronounced because substations serve as connection points for multiple transmission lines and have distinct and more frequent operation and maintenance requirements within the substation fence compared to transmission lines. Similar to a transmission line crossing, safety concerns relating to construction and maintenance of the over-crossing transmission line may necessitate that the entire substation beneath it be taken out of service. In the event of a failure in the structures or conductors of the line crossing over the top, it may also take the substation beneath it out of service and potentially damage structures and equipment within the substation – equipment that can take an extended time to procure and replace. Standard substation maintenance procedures, such as accessing or moving equipment with a crane or telescoping lift, are significantly complicated – and possibly inhibited – by the presence of an energized overhead transmission line. Thus, any such work would likely require taking the transmission line off-line, which would not be necessary for a transmission line that does not cross over the substation. For these reasons, among others, high-voltage transmission lines almost never cross over existing substations, unless that transmission line connects to that particular substation, and siting for new high-voltage transmission lines prioritizes avoidance of existing substations by routing around them.

The Applicants have noted that no alternative alignment has been proposed to demonstrate how route alternatives E4 and E5 could be modified, augmented, or otherwise adjusted within the proposed route width, or even with an expanded route width, to route the new double-circuit 345 kV line around the existing Riverton Substation

⁶ ALJ Report at Finding 116 (Nov. 8, 2024) (eDocket No. [202411-211770-02](#)).

⁷ Winter Direct Schedule 3 at 1-2 (July 8, 2024) (eDocket No. [20247-208392-03](#)). (“Line crossings’ refers to the construction of a new high-voltage transmission line in a configuration where it must traverse over or under an existing high-voltage transmission line, placing the conductors of one transmission line physically over the conductors of the other transmission line. Line crossings are generally technically possible. However, high-voltage transmission line crossings create unique safety, reliability, and resiliency concerns, while also contributing to increased cost and environmental impacts due to the need for taller and larger structures. Consequently, good utility practice is to minimize new line crossings to the greatest practical extent when routing new high-voltage transmission lines.”)

to allow for safe and proper operation of the substation, the proposed double-circuit 345 kV line, and all of the existing 230 kV, 115 kV, 69 kV, and 34.5 kV transmission and distribution lines that currently terminate at the existing Riverton Substation. Therefore, it must be assumed that construction of route alternatives E4 and E5 as proposed would require the complete relocation of the Riverton Substation.⁸ Existing features around the substation prevent routing around the substation within the route widths of route alternatives E4 and E5.⁹ These constraints are shown in **Attachment 3**¹⁰ and include:

- 1) The existing Riverton 230 kV/115 kV Substation.
- 2) The access road for the existing Riverton Substation, which would be impacted if the alignment for either route alternative E4 or route alternative E5, shown in the EA, were adjusted to the north of the Riverton Substation.
- 3) A building located on private property north of the Riverton Substation, which would be impacted and potentially displaced if the alignment shown in the EA were adjusted to the north of the Riverton Substation.
- 4) Four existing transmission lines north of the Riverton Substation (one 69 kV line, two 115 kV lines, and one 230 kV line), which would need to be crossed if the alignment shown in the EA were adjusted to the north of the Riverton Substation, increasing the total number of line crossings required for route alternatives E4 and E5 from six to ten.
- 5) The Cuyuna Country State Recreation Area, which would be impacted by any new right-of-way expansion east of the Riverton Substation.
- 6) A private residence, which would be impacted and potentially displaced if the alignment shown in the EA were adjusted to the south of the existing Riverton Substation.
- 7) Two existing 230 kV transmission lines west of the Riverton Substation, which would need to be crossed if the alignment shown in the EA were adjusted to the south of the existing Riverton Substation, increasing the total number of line crossings required for route alternatives E4 and E5 from six to eight.
- 8) Minnesota Power's planned expansion of the Riverton Substation to construct a static synchronous compensator ("STATCOM") system to provide steady state and dynamic voltage support for the local and regional 230 kV network, as discussed in the direct testimony of the Applicants' witness, Mr. Winter and reported in the 2023

⁸ ALJ Report at Finding 116 (Nov. 8, 2024) (eDocket No. [202411-211770-02](#)).

⁹ Applicants' September 19, 2024 Response to Public Hearing Comments at Attachment E at 15-17 (Sept. 19, 2024) (eDocket No. [20249-210359-06](#)).

¹⁰ Applicants' September 19, 2024 Response to Public Hearing Comments at Attachment E at Figure 2 (Sept. 19, 2024) (eDocket No. [20249-210359-06](#)).

Minnesota Biennial Transmission Projects Report under tracking number 2021-NE-N21.

- 9) Three existing transmission lines south of the Riverton Substation (one 69 kV line, one 115 kV line, and one 230 kV line), which would need to be crossed if the alignment shown in the EA were adjusted to the south of the existing Riverton Substation. In combination with the two existing 230 kV lines west of the Riverton Substation, this adjustment would increase the total number of line crossings required for route alternatives E4 and E5 from six to eleven.¹¹

There are also existing transmission lines and business operations located in close proximity to the existing Riverton Substation that would prevent locating this route alternative alignment around the Riverton Substation without resulting in additional displacement in the area.¹² For route alternatives E4 and E5 to be constructable as proposed, the Riverton Substation would need to be relocated and additional modifications to the existing transmission lines in the area would need to be developed and included with the route alternatives.

Route alternatives E4 and E5 were not proposed by the Applicants. Therefore, the Applicants are not in a position to provide any further insight on what these conceptual modifications might be, other than the high-level assumptions the Applicants have made to develop a conceptual cost estimate in response to question 7, below. As stated previously, the Applicants' assessment is that the most reasonable and constructable routes for the Project in this area are the Modified Proposed Route or the Co-Location Maximization Route, both of which have been fully developed with proposed alignments and modifications to existing infrastructure to mitigate impacts to the area.

For the above reasons, route alternatives E4 and E5 are not constructable as proposed.

7. Provide a thorough discussion of the relocation of the Riverton Substation and any range of cost that the applicant has developed.

Construction of route alternative E4 or E5, as proposed, would necessitate the relocation of the Riverton Substation. This relocation poses multiple concerns not present for the Applicants' Modified Proposed Route or Co-location Maximization Route. In particular, the need to relocate the Riverton Substation is driven by safety and operational considerations for the construction and maintenance of the substation and the Project. Most significantly, such relocation would add at least a year onto the overall engineering and construction of the Project – and this relocation work would need to be completed before construction of the Project could commence in the Riverton area. Such relocation

¹¹ Applicants' September 19, 2024 Response to Public Hearing Comments at Attachment E at 15-17 (Sept. 19, 2024) (eDocket No. [20249-210359-06](#)).

¹² Applicants' September 19, 2024 Response to Public Hearing Comments at Appendix 1 to Attachment E at 7 (Sept. 19, 2024) (eDocket No. [20249-210359-06](#)).

of the Riverton Substation would cost more than either of the Applicants' routes in this area.

Relocating the Riverton Substation would result in significant schedule impacts (at least a one year delay)¹³ for the Project. Minnesota Power would need to find and acquire sufficient land for the Riverton Substation relocation, then engineer and design the substation, procure the necessary equipment, and construct the new Riverton Substation and associated transmission line modifications. This work would need to be completed prior to commencing construction (and even potentially portions of design and engineering) of the Project through the Riverton area.

Further, Minnesota Power's planned Riverton STATCOM Project and other projects planned for construction in the area within the next three to five years to improve reliability of the area transmission system and address age and condition of existing infrastructure would also need to be delayed until the new Riverton Substation site is identified and acquired.

To relocate the Riverton Substation to accommodate siting of the new double-circuit 345 kV line along the alignment proposed for route alternatives E4 and E5, the Applicants would first need to identify a suitable location for the new substation. Such a location should be adjacent to the existing 230 kV, 115 kV, 69 kV, and 34.5 kV lines that currently terminate at the Riverton Substation, with sufficient space to accommodate all the existing infrastructure plus room for operations and maintenance. Based on the size of the existing Riverton 230 kV/115 kV Substation plus currently-planned expansions, such as Minnesota Power's Riverton STATCOM Project, the Applicants estimate that a minimum of 20 acres would be required for the relocated substation.

All existing 230 kV, 115 kV, 69 kV, and 34.5 kV lines presently interconnected to the Riverton substations would need to be extended from the existing Riverton Substation location to the new location. The human and environmental impacts and costs of these line extensions are highly dependent on the location of the relocated Riverton Substation. For example, if the substation were to be relocated north of Little Rabbit Lake, many of these lines would need to cross Little Rabbit Lake, the Mississippi River, or both. As they have done with the proposed Co-Location Maximization Route, the Applicants would consider corridor consolidation to the extent feasible. However, the relocation of the Riverton Substation would necessarily involve the modification and extension of four (4) 230 kV lines, five (5) 115 kV lines, two (2) 69 kV lines, and four (4) 34.5 kV distribution feeders, some of which cannot be co-located on common structures for reliability reasons. Along with the construction costs, the human and environmental impacts of these modifications have not been defined or evaluated for route alternatives E4 and E5 to the extent such modifications would occur outside of a route width studied in the EA and could not be undertaken fully until a suitable location for the relocated Riverton Substation were identified.

¹³ In light of current procurement and supply chain challenges, this estimate could increase.

Based on recent engineering and construction experiences by the Applicants, a conceptual estimate for route alternatives E4 and E5 including the estimated additional construction cost of relocating the Riverton Substation would be expected to be at least \$181.1 million, as compared to \$43.2 million for the equivalent segment of the Modified Proposed Route and \$124.3 million for the equivalent segment of the Co-Location Maximization Route.¹⁴ This estimate is based on the estimated cost of modifications to the Riverton Substation and surrounding transmission lines developed for route alternative E1, plus the additional cost of relocating the Riverton 230 kV Substation, which is not modified for route alternative E1 but would need to be relocated for route alternatives E4 and E5 in this scenario. This conceptual minimum cost estimate is generally valid for relocating the Riverton Substation to a different site within approximately one mile of the existing substation site and located adjacent to one of the existing transmission line corridors currently connected to the Riverton Substation.

Beyond that distance or outside of the existing transmission line corridors, significant additional transmission line extension costs would begin to accrue, as noted above, increasing the cost of the relocation by as much as \$28 million per mile. It is important to note that the Applicants have not been able to identify a suitable relocation site for the Riverton Substation and are, therefore, not in a position to provide a definitive cost of such relocation.

8. Provide an overall comparison to the cost of the ALJ route alternatives E4 and E5 with the Co-location Maximization option taking into account residential displacement and the Riverton Substation.

Please see **Attachment 4**.

9. The Midcontinent Independent System Operator (MISO) just approved “Maple River – Cuyuna 345” as part of their latest Tranche (Tranche 2.1) of Long-Range Transmission Planning (LRTP).

- a. *Is the present proposal that the Maple River – Cuyuna 345 transmission line terminate at the portion of this project identified as the “Cuyuna Series Compensation Station”?*

Yes. The Minnesota endpoint of the Maple River – Cuyuna 345 kV Project (LRTP Project #20) is the Cuyuna Series Compensation Station included in this proceeding.

- b. *If not, where is the anticipated termination and how would it interact with this project and the substations in around Rabbit Lake?*

Please see the Applicants’ response to question II.9(a).

¹⁴ Applicants’ September 19, 2024 Response to Public Hearing Comments at Attachment C at Appendix 4 at Table 8 (Sept. 19, 2024) (eDocket No. [20249-210359-06](#)).

III. Existing route shifting from Crow Wing CSAH 2 to Elk River Co-Location.

- 1. Provide a discussion and cost estimate as to why the applicants at the end of modified route alternative H4/H7 crossed the existing 230kv line to parallel it on the west with the proposed route.**

The Applicants developed route alternative H4/H7 to address many of the comments received from landowners in this area to increase distances between the Project and residences, avoid permanent impacts to a vineyard, minimize use of privately-owned lands, and make the greatest use of tax forfeited lands.¹⁵ Route alternative H4/H7 maximizes the use of properties owned by Crow Wing County and has been discussed with the county and landowners in this area with no significant concerns raised to date.¹⁶

The 230 kV line crossing at the end of modified route alternative H4/H7 is included in the cost estimate provided by the Applicants and is similar to a line crossing at this same location that was included in the Applicants original proposed route. In developing the original proposed route and the modified proposed route, the Applicants considered that at least one crossing of the existing 230 kV transmission line corridor would be unavoidable because the proposed 345 kV transmission line starts at the Iron Range Substation on the east side of the existing 230 kV transmission line corridor and eventually terminates at the Benton County Substation located west of the existing 230 kV transmission line corridor. While this one crossing is unavoidable, the Applicants sought to eliminate all other crossings of the existing 230 kV transmission line due to the reliability and safety issues introduced by these particular crossings.

In determining the optimal location for the one unavoidable crossing of the existing 230 kV transmission line, the Applicants considered routing constraints and opportunities along the entire existing 230 kV transmission corridor between the Iron Range and Benton County Substations. North of the proposed crossing location, the majority of constraints pointed to paralleling the east side of the existing corridor. From the proposed crossing location south to the Benton County Substation, there are fewer homes and buildings located near to the west side of the existing 230 kV transmission line corridor compared to the east side. To address the limited number of constraints along the west side of the existing corridor that do present a challenge for siting the new 345 kV transmission line, the Applicants have proposed realignments to shift the existing line east, making room for the new 345 kV line on the existing right-of-way for short distances. At the proposed crossing location, both the original proposed route and the modified proposed route have the new 345 kV transmission line rejoining the existing 230 kV transmission line corridor from the east. Since the new 345 kV line is already running perpendicular to the existing 230 kV line as it rejoins the corridor, there is an opportunity to cross the existing 230 kV line at this location before changing directions, thus saving one 90 degree turn and the associated heavy angle structure that would be required for a crossing at a different location where the proposed 345 kV transmission line route runs parallel to the existing corridor.

¹⁵ ALJ Report at Finding 132 (Nov. 8, 2024) (eDocket No. [202411-211770-02](#)).

¹⁶ ALJ Report at Finding 132 (Nov. 8, 2024) (eDocket No. [202411-211770-02](#)).

2. **By paralleling the existing 230kv line on the West side, the applicants identify five shifts of the line to avoid residential and agricultural impacts in both the Modify Proposed Route and the Co-location Maximization Route in this part of the corridor. Identify in the record and provide a discussion of the costs of each of those route shifts and the rationale for the associated costs.**

The Applicants identify these five realignments to facilitate routing the Project on the west side of the existing 230 kV line (four in Morrison County and one in Benton County) in Section 2.1.5.4 2 of the Combined Application, and the cost of the proposed realignments is included as part of the “Realignments and Reroutes” line item in Table 2-3 of the Combined Application.¹⁷ In addition, as included in the Applicant’s September 19, 2024, Response to Public Hearing Comments, the Applicants also support modified alignment alternative AA17 located in Crow Wing County which, likewise, facilitates routing the Project on the west side of the existing 230kV line by realigning the centerline of the existing 230kV line.¹⁸ The total estimated costs associated with these six realignments, including AA17, is \$11 million (mid-range estimate in 2022 dollars). The estimated cost for each individual realignment is as follows:

| Realignment | Cost Estimate Range (mid-range)(2022\$) |
|--|--|
| Section 19, Granite Township, Morrison County | \$1.4 million |
| Section 31, Granite Township, Morrison County | \$1.6 million |
| Section 23, Pierz Township, Morrison County | \$1.7 million |
| Sections 26 and 35, Buckman Township, Morrison County | \$2.4 million |
| Section 2, Minden Township, Benton County | \$2.6 million |
| AA17 – Sections 7 and 18, Platte Lake Township, Crow Wing County | \$1.2 million |

3. **If the proposed route will parallel existing 230kv line on the East side, identify the locations where the route would need to shift in this part of the corridor, the rationale for such shifts, and the estimated cost.**

As shown in the table below, paralleling the existing 230 kV line on the east side as opposed to the west side would increase both the number and total cost of realignments necessary to avoid residences and structures in a comparable manner to the Applicants’ Modified Proposed Route and Co-location Maximization Route.

¹⁷ Application at 2-13 (Aug. 4, 2023) (eDocket No. [20239-198009-04](#)). The Realignments and Reroutes line item of Table 2-3 also includes the cost of realignments and reroutes necessary for other parts of the proposed route and at substation sites, in addition to the five realignments discussed here.

¹⁸ Applicants’ September 19, 2024 Response to Public Hearing Comments at Attachment A at 3-4 (Sep. 19, 2024) (eDocket No. [20249-210355-04](#)).

| | West side of Existing (as filed) | | East side of Existing | |
|-------------------------------------|----------------------------------|--------------------------|-----------------------|--------------------------|
| | Modified Proposed | Co-Location Maximization | Modified Proposed | Co-Location Maximization |
| Number of Realignment | 6 | 6 | 12 | 10 |
| Estimated Total Cost of Realignment | \$11 million | \$11 million | \$19.1 million | \$15 million |

The estimated cost for each individual realignment necessary to route the project on the east side of existing 230kV is as follows:

| Realignment | Cost Estimate Range (mid-range)(2022\$) |
|---|---|
| Sections 18 and 19, Platte Lake Township, Crow Wing County | \$1.2 million |
| Sections 7 and 18, Granite Township, Morrison County | \$0.9 million |
| Sections 18 and 19, Granite Township, Morrison County | \$1.2 million |
| Sections 19 and 30, Granite Township, Morrison County | \$1.2 million |
| Sections 2 and 11, Buckman Township, Morrison County | \$1.3 million |
| Section 35, Buckman Township, Section 2, Graham Township, Morrison County | \$1.2 million |
| Sections 14 and 23, Mayhew Lake Township, Benton County | \$1.2 million |
| Sections 26 and 35, Mayhew Lake Township, Benton County ¹⁹ | \$1.7 million |
| Section 2, Minden Township, Benton County | \$2.6 million |
| Section 14, Minden Township, Benton County ²⁰ | \$2.3 million |
| Section 23, Minden Township, Benton County | \$2.8 million |
| Sections 23 and 26, Minden Township, Benton County | \$1.5 million |

In addition to increasing the number of necessary realignments, paralleling the existing 230 kV line on the east necessitates crossing the existing 230 kV line near Benton County Substation. The closer the single, unavoidable 230 kV crossing location gets to the Benton County Substation, and as a result, the closer it is to the nearby St. Cloud airport, the more challenging the feasibility of this crossing becomes due to expected FAA restrictions limiting the heights of structures in the area; this is particularly the case within the first 2.4 miles north of Benton County Substation where the existing 230 kV line is double circuited and therefore on taller structures. It may not be possible to design the new 345 kV double circuit line to cross over the 230 kV double circuit line within FAA height restrictions without either modifying the existing line or broadening the proposed

¹⁹ Realignment already included in the scope of the Elk River Alignment Alternative in the Applicant's Maximum Co-Location Route.

²⁰ Realignment already included in the scope of the Elk River Alignment Alternative in the Applicant's Maximum Co-Location Route.

right-of-way to accommodate a horizontal (instead of vertical) configuration for either the double-circuit 345 kV line, the double-circuit 230 kV line, or both.

Maps identifying the locations where the route would need to shift are provided in **Attachment 5**.

- 4. Provide a description, cost estimates, and rationale for why the applicants could not do a double crossover of the existing 230kv line in the areas where there are impacted residences and agricultural structures in this portion of the proposed route corridor.**

Each conventional crossing of the existing 230 kV transmission line adds approximately \$2 million in costs and therefore a “double crossover” would cost in the range of \$4 million. To cross over the existing 230 kV, taller and more robust structures (known as “dead-end structures”) are required to turn the line first perpendicular and then parallel and to span the existing line(s). Actual costs are dependent on factors such as length, topography, number of lines being spanned, etc. As shown in response to question III.2, the individual realignments proposed for the Project in the Application and included in the Modified Proposed Route and the Co-location Maximization Route are more cost-effective when compared to a double crossover at the same location and are also superior in terms of reliability and safety. As discussed in Winter Direct, Schedule 3, crossing of high-voltage transmission lines is avoided unless unavoidable due to reliability, resiliency, and safety considerations.

IV. Conclusion

The Applicants appreciate the opportunity to provide these responses to the Commission’s questions. The Applicants request the opportunity to respond (either in writing or at a scheduled Commission meeting) to any comments filed in response to the Commission’s notice.

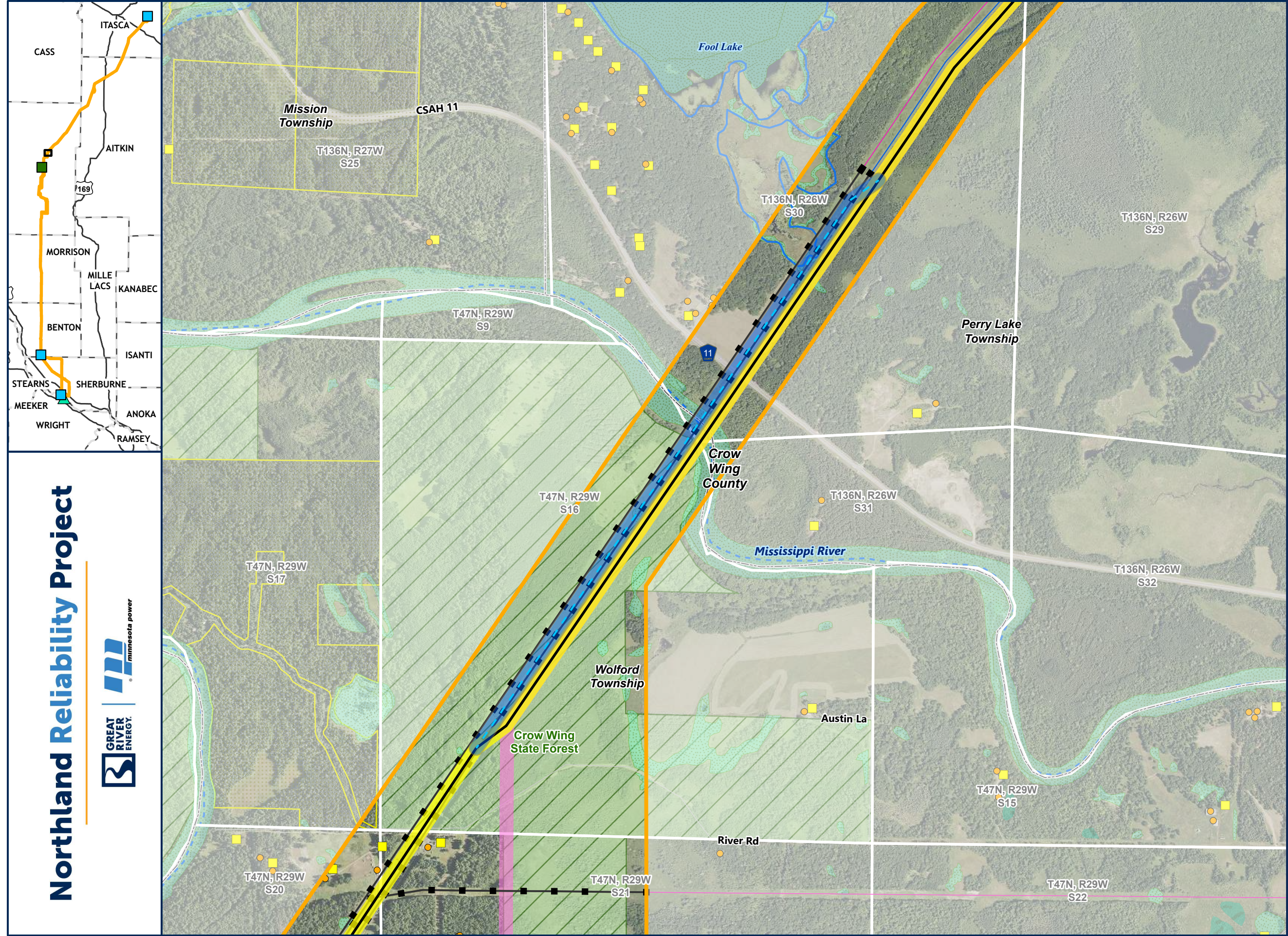
Sincerely,

/s/ Kodi J. Verhalen
Kodi J. Verhalen
Taft Stettinius & Hollister LLP
Attorney for Minnesota Power

/s/ Lisa M. Agrimonti
Lisa M. Agrimonti
Fredrikson & Byron, P.A.
Attorney for Great River Energy

1/9/2025

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**Detailed Map
Cole Lake Way (AA3)
Starting North of
CSAH11 and Mississippi
River Co-Location
Maximization Route**

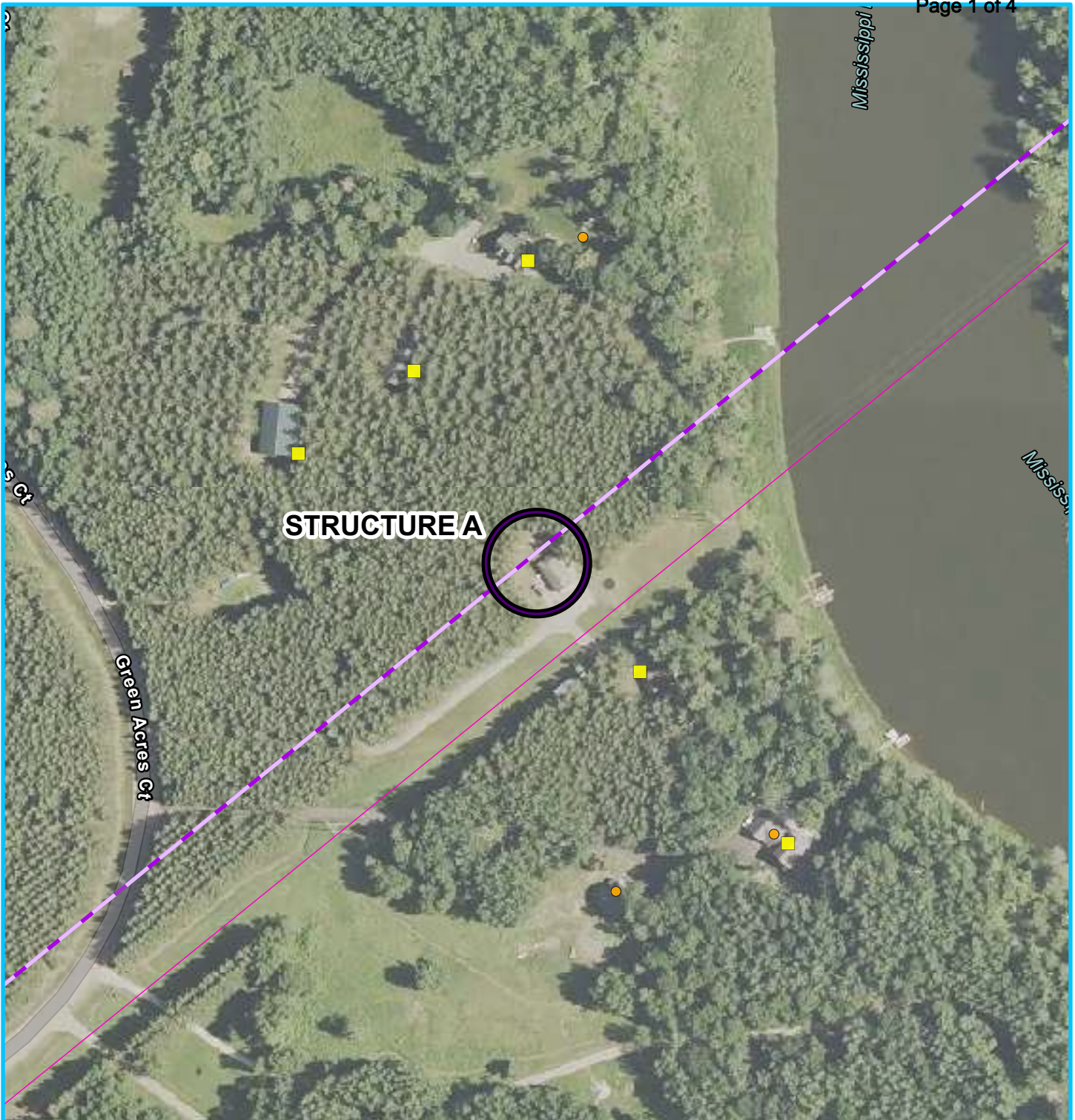
- CO-LOCATION MAXIMIZATION ROUTE
- MISSISSIPPI RIVER EXTENSION CENTERLINE
- MISSISSIPPI RIVER EXTENSION RIGHT OF WAY
- CO-LOCATION MAXIMIZATION ROUTE CENTERLINE
- CO-LOCATION MAXIMIZATION ROUTE RIGHT OF WAY
- MODIFIED PROPOSED ROUTE RIGHT-OF-WAY
- REBUILD EXISTING TRANSMISSION FOR AA3 AND E1
- EXISTING TRANSMISSION LINE**
- 115 KV
- 230 KV
- SUBSTATION SITING AREA
- BIG OAKS SUBSTATION AREA
- RESIDENCE
- NOT A RESIDENCE
- PWI WATERCOURSE
- PWI WATERBODY
- NON-FORESTED WETLAND
- FORESTED WETLAND
- WILDLIFE MANAGEMENT AREA
- STATE CONSERVATION EASEMENT
- FEDERAL CONSERVATION EASEMENT
- AQUATIC MANAGEMENT AREA
- STATE FOREST
- STATE PARK
- OTHER DNR LAND
- COUNTY BOUNDARY



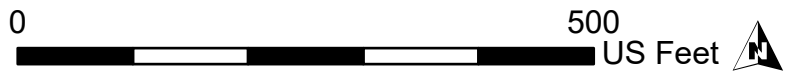
Northland Reliability Project



Date: 1/8/2025



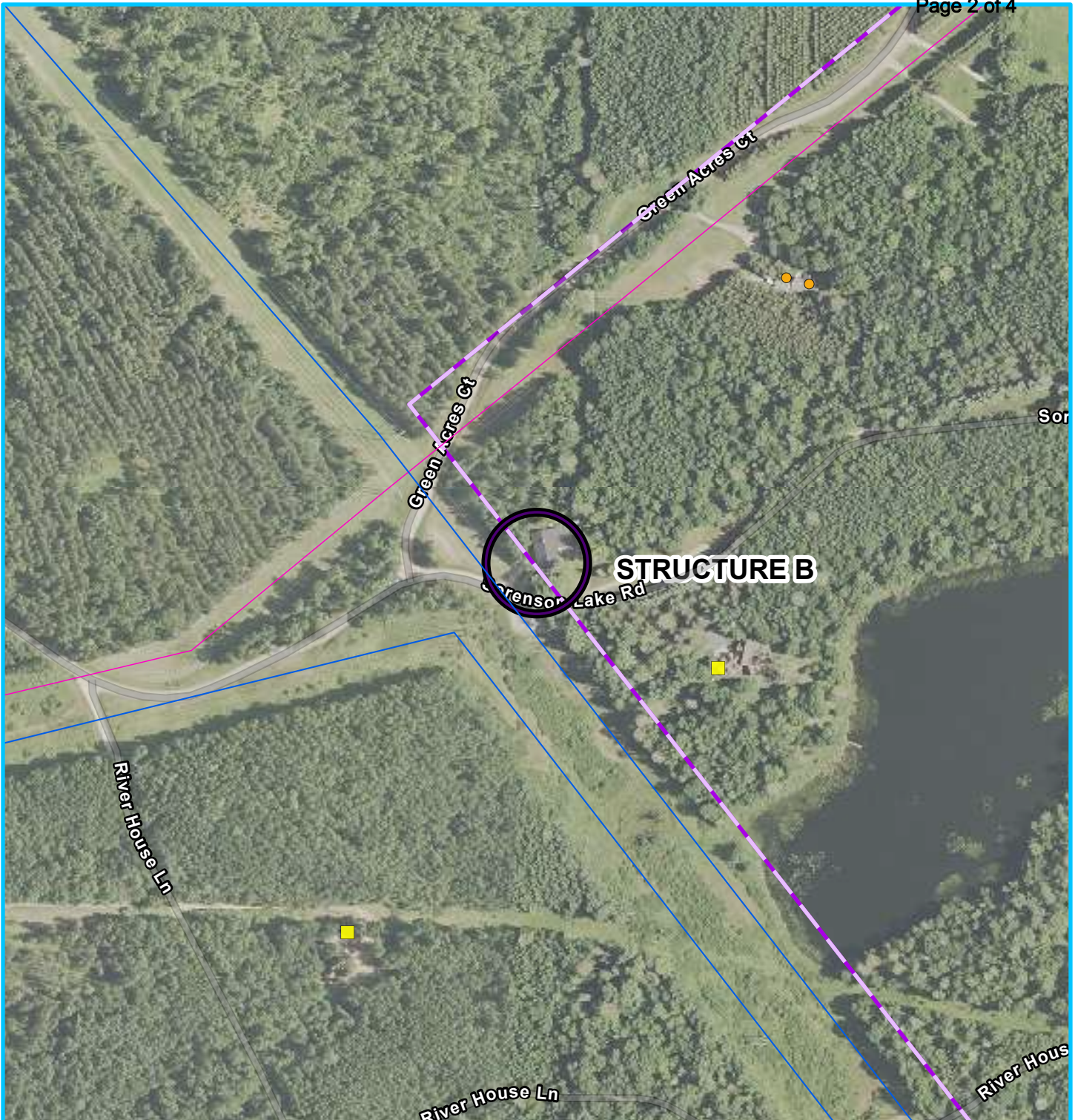
- CO-LOCATION MAXIMIZATION ROUTE CENTERLINE
- ALTERNATIVE E5 CENTERLINE
- - - ALTERNATIVE E4 CENTERLINE
- RESIDENCE
- NOT A RESIDENCE
- POTENTIAL DISPLACED STRUCTURES
- EXISTING TRANSMISSION LINE 115 KV



**POTENTIALLY DISPLACED STRUCTURES
ALTERNATIVE ROUTES E4 & E5
MAP OF STRUCTURE A**

Northland Reliability Project

Date: 1/8/2025



- | | | |
|---|----------------------------------|------------------------------|
| — CO-LOCATION MAXIMIZATION ROUTE CENTERLINE | ■ RESIDENCE | — EXISTING TRANSMISSION LINE |
| — ALTERNATIVE E5 CENTERLINE | ● NOT A RESIDENCE | — 115 KV |
| — ALTERNATIVE E4 CENTERLINE | ○ POTENTIAL DISPLACED STRUCTURES | — 230 KV |

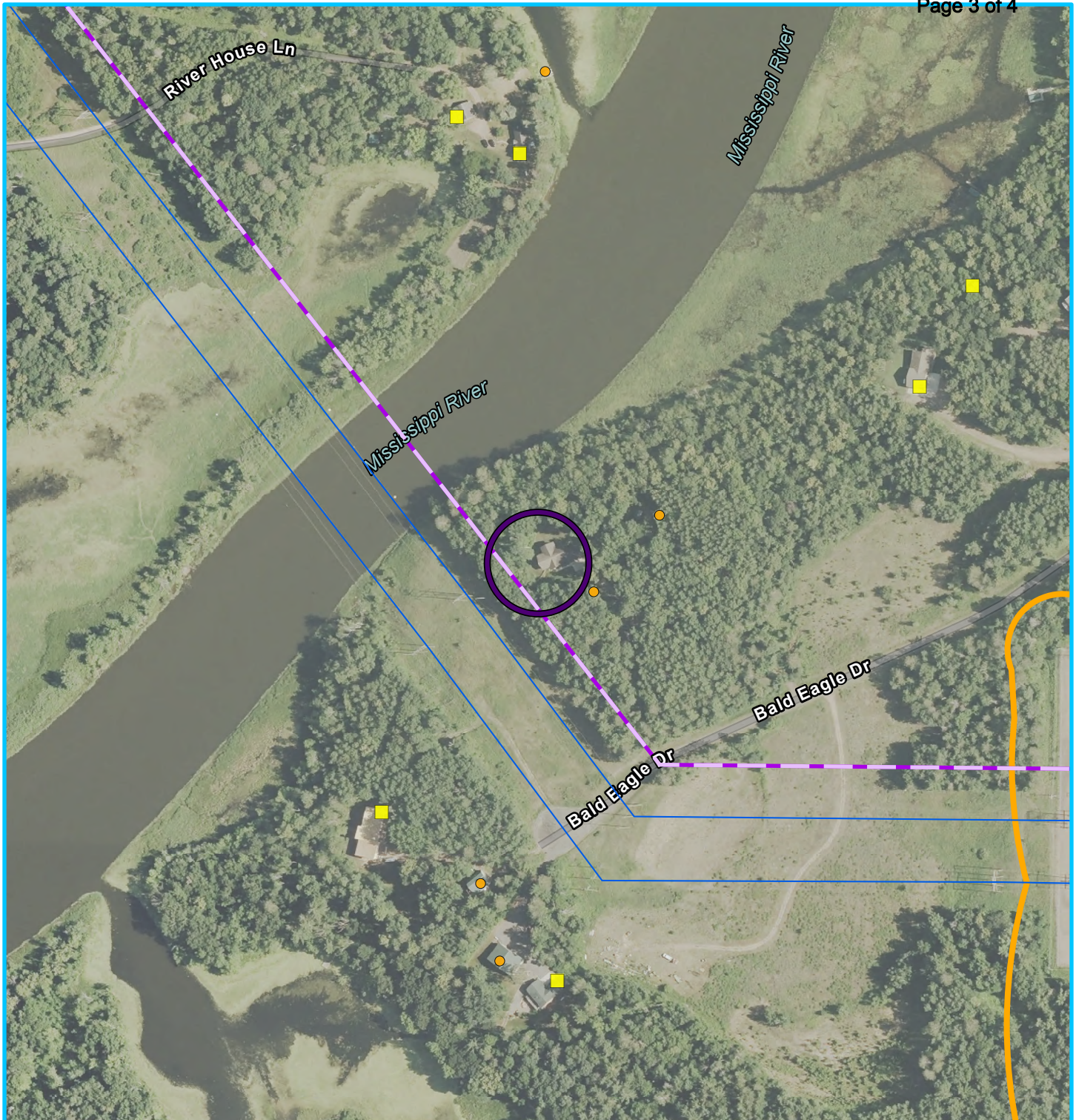


**POTENTIALLY DISPLACED STRUCTURES
ALTERNATIVE ROUTES E4 & E5
MAP OF STRUCTURE B**

Northland Reliability Project



Date: 1/10/2025



- CO-LOCATION MAXIMIZATION ROUTE
- CO-LOCATION MAXIMIZATION ROUTE CENTERLINE
- ALTERNATIVE E5 CENTERLINE
- ALTERNATIVE E4 CENTERLINE
- RESIDENCE
- NOT A RESIDENCE
- POTENTIAL DISPLACED STRUCTURES
- EXISTING TRANSMISSION LINE
230 KV

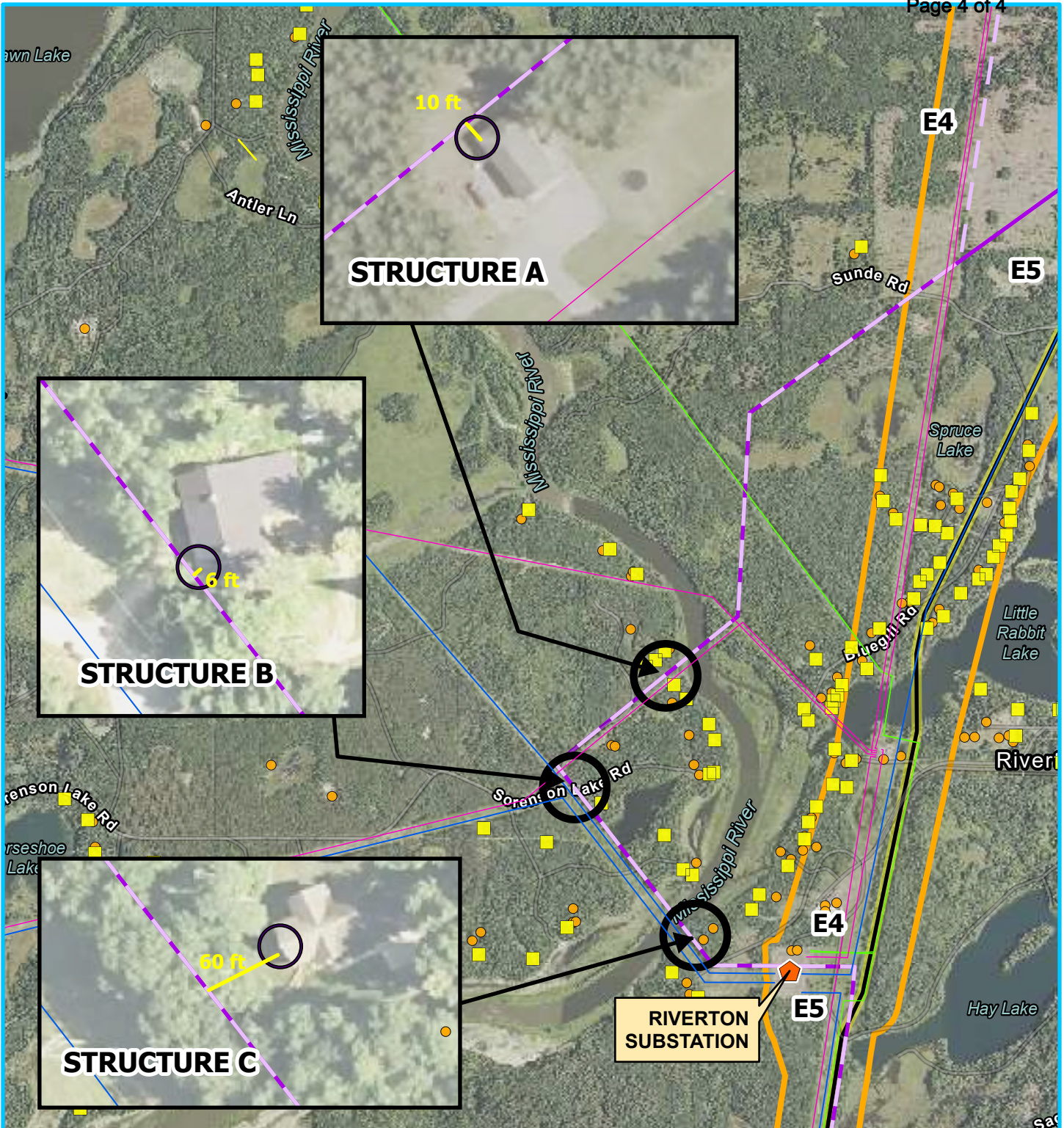


**POTENTIALLY DISPLACED STRUCTURES
ALTERNATIVE ROUTES E4 & E5
MAP OF STRUCTURE C**

Northland Reliability Project



Date: 1/8/2025



- | | | |
|---|----------------------------------|--------------------------------|
| CO-LOCATION MAXIMIZATION ROUTE | ALTERNATIVE E5 CENTERLINE | RESIDENCE |
| CO-LOCATION MAXIMIZATION ROUTE CENTERLINE | ALTERNATIVE E4 CENTERLINE | NOT A RESIDENCE |
| CO-LOCATION MAXIMIZATION ROUTE RIGHT OF WAY | EXISTING TRANSMISSION LINE 69 KV | POTENTIAL DISPLACED STRUCTURES |
| RIVERTON SUBSTATION | 115 KV | |
| | 230 KV | |



**POTENTIALLY DISPLACED STRUCTURES
ALTERNATIVE ROUTES E4 & E5
OVERVIEW MAP**

Northland Reliability Project



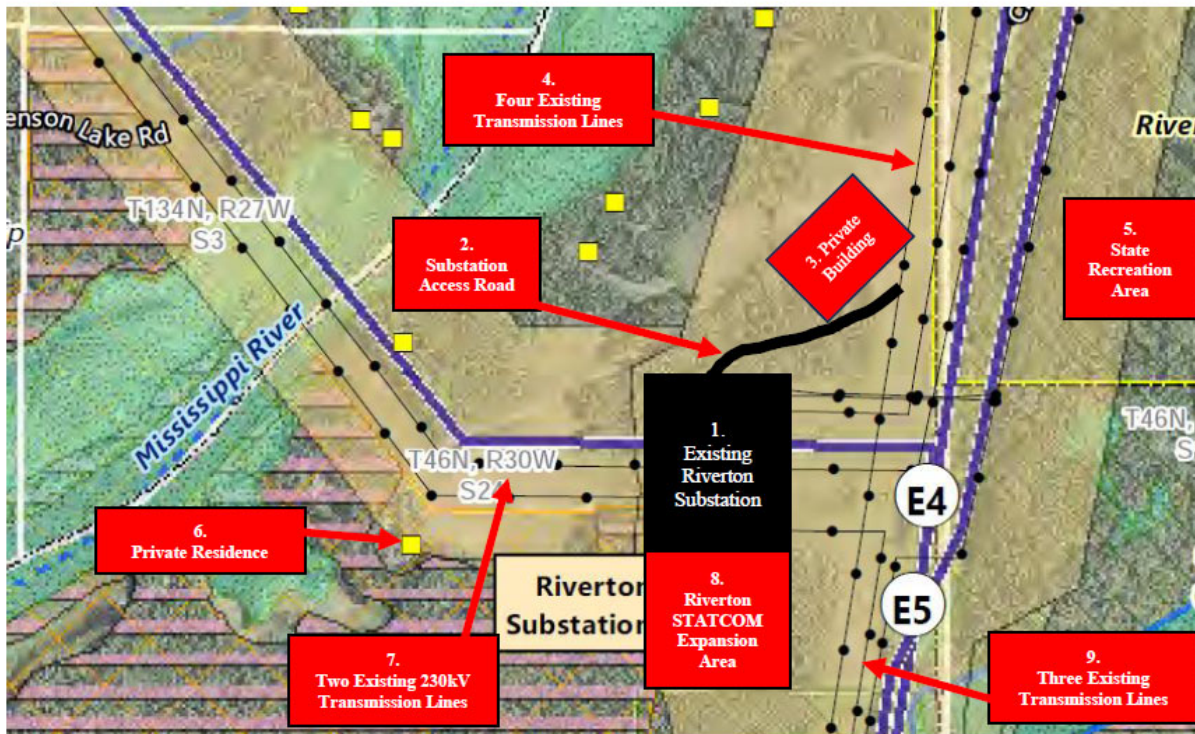


Table 8: Route Alternative E1 and E4/E5 Estimated Cost (\$ Millions)¹

| Route Alternatives E1 and E4/E5 (Riverton) | Modified Proposed Route ¹ | Co-Location Maximization Route ² | Route Alternatives E4 or E5 <i>Conceptua</i> ^β |
|--|--------------------------------------|---|---|
| Project | \$43.3 | \$39.8 | \$66.4 |
| Infrastructure Stacking | N/A | \$84.5 | \$114.7 |
| TOTAL | \$43.3 | \$124.3 | \$181.1 |
| <i>Incremental Cost</i> | <i>\$0.0</i> | <i>\$81.0</i> | <i>\$137.8</i> |

Notes

1. In the original Table 8 of Appendix 4 to Attachment C of Applicants Sept 19 Public Hearing Comments, the estimated cost for the Modified Proposed Route shown in Table 8 does not include the incremental cost of alignment alternatives AA9 and AA10, which are located within the same area of the Original Proposed Route as route alternative E1 and are included in the Modified Proposed Route. To provide a complete comparison of the routes as proposed, those additional costs for alignment alternatives AA9 and AA10 have been included in this table, resulting in an additional \$0.1 million compared to the original number in Table 8 from the Applicants September 19 Public Hearing Comments.
2. The incremental cost for route alternative E1 (Riverton) shown in Table 8 represents the mid-range incremental cost of the alternative (\$81.1M). The incremental cost for the Riverton Area Alternative Corridor provided in Ex. APP-36 at 11:3-4 (Winter Direct) represents the high-range incremental cost of the alternative including contingency (\$99.5M). For overall project cost estimate range impacts, see Table 14. In the course of preparing this filing, Applicants discovered an error in data provided to EERA with respect to EERA's cost estimates in its September 5, 2024 filing. Applicants estimates here have corrected that error.
3. Cost estimate for Route Alternatives E4 or E5 is based on the equivalent cost estimate for Route Alternative E1 (Co-Location Maximization Route) with the following key assumptions:
 - a. Route alternatives E4 and E5 are 1.0 mile longer and 1.2 miles longer than Co-Location Maximization Route, respectively, based segment lengths provided in EA Table 6-62. Cost estimate based on length of route alternative E5

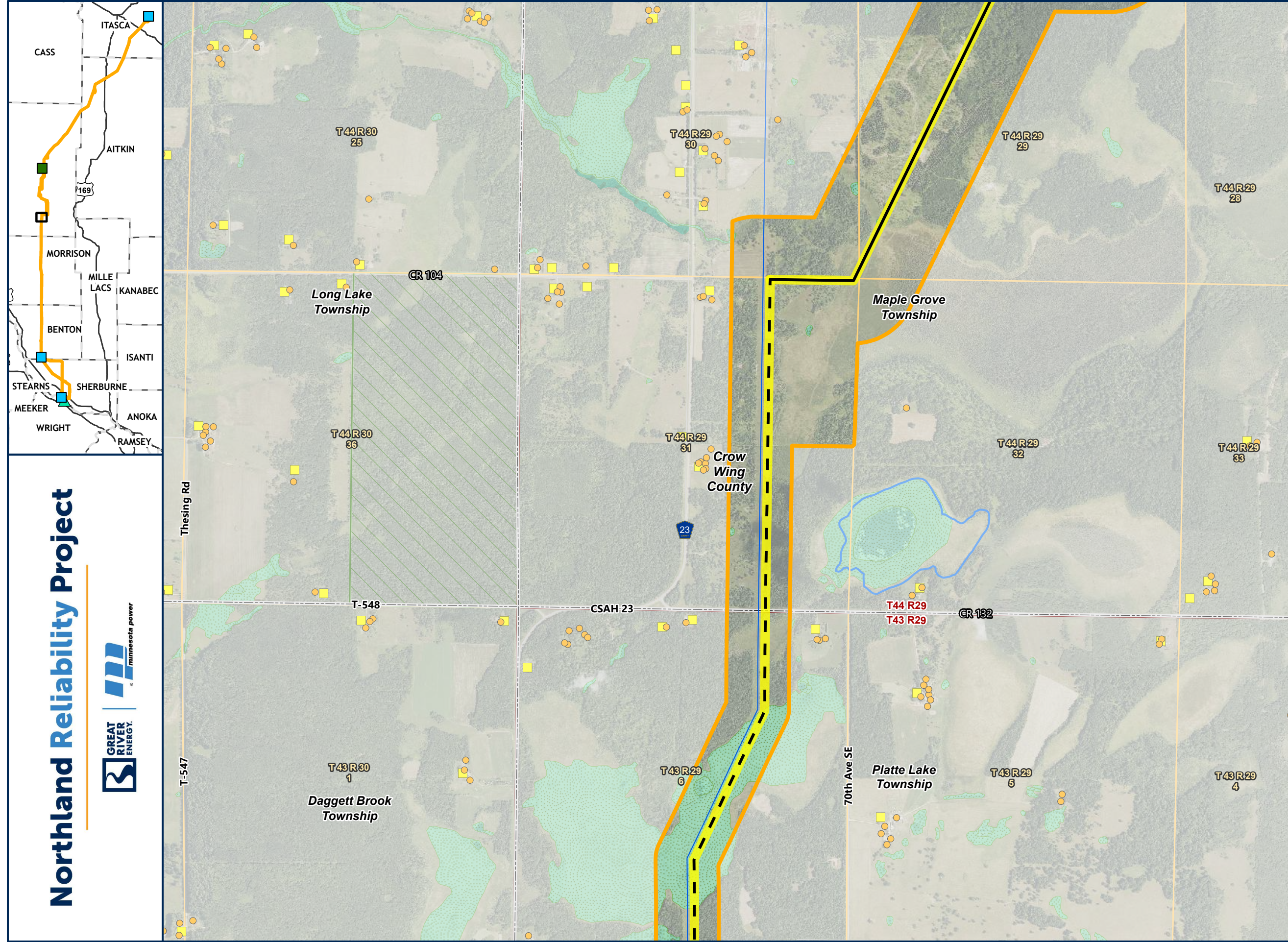
¹ Applicants' September 19, 2024 Response to Public Hearing Comments at Attachment C at Appendix 4 at Table 8 (Sept. 19, 2024) (eDocket No. [20249-210359-06](#)).

- b. Route for E4/E5 requires 10 transmission line crossings at a cost of \$2 million per crossing. This includes the six line crossings identified in EA Table 6-62 plus four additional line crossings after crossing over the Riverton Substation site, as identified in the Applicants' September 19 Public Hearing Comments and shown in Figure 2 of Attachment E to Applicants Public Hearing Comments.
- c. Additional cost of relocating Riverton 230 kV Substation with less than 1 mile of rerouting of existing 230 kV lines included based on recent engineering and cost estimating for similar substations and transmission lines
- d. Additional cost of removing existing Riverton 230 kV Substation included based on recent engineering and cost estimating for similar substations

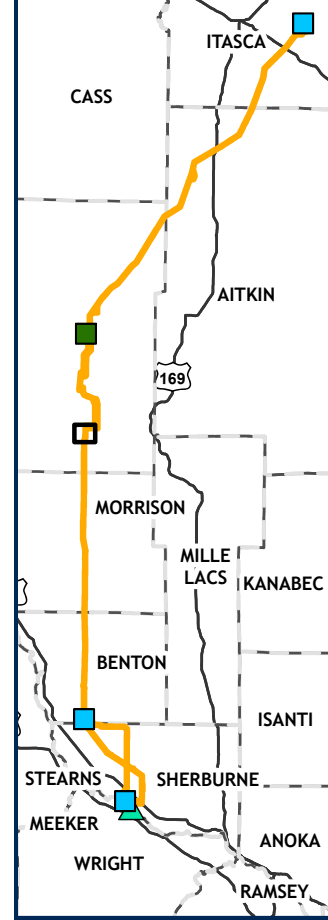
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Detailed Map Long Lake South to Benton County Substation Route East Side Page 1 of 20

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- CO-LOCATION MAXIMIZATION ROUTE
- PROPOSED CENTERLINE
- NOTIONAL NRP CENTERLINE
- NOTIONAL RIGHT OF WAY
- EXISTING TRANSMISSION LINE
 - 230 KV
- SUBSTATION SITING AREA
- BIG OAKS SUBSTATION AREA
- RESIDENCE
- NOT A RESIDENCE
- PWI WATERCOURSE
- PWI WATERBODY
- NON-FORESTED WETLAND
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- STATE PARK
- OTHER DNR LAND
- COUNTY BOUNDARY

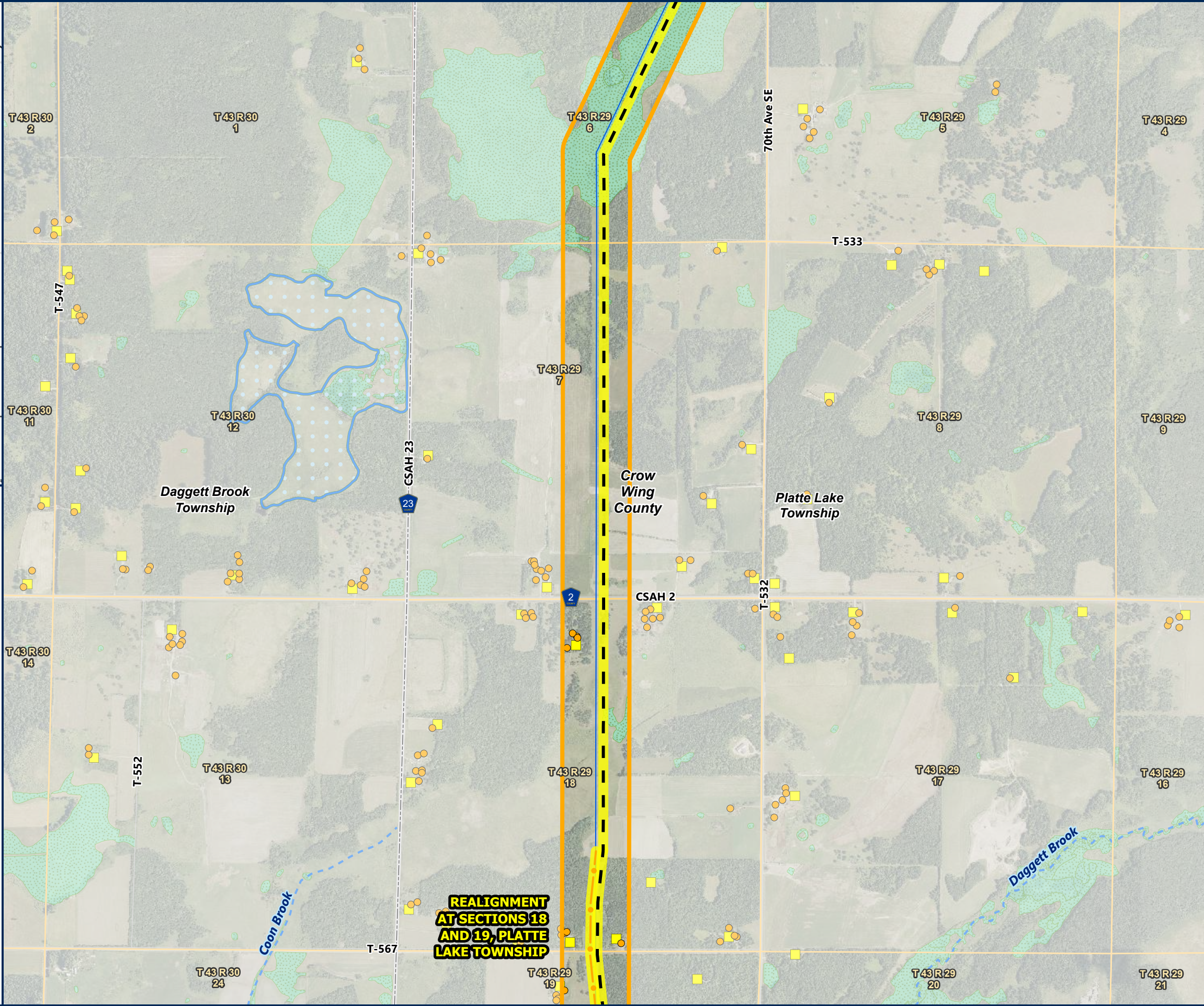


Northland Reliability Project



Detailed Map Long Lake South to Benton County Substation Route East Side Page 2 of 20

-  CO-LOCATION MAXIMIZATION ROUTE
-  NOTIONAL NRP CENTERLINE
-  NOTIONAL REBUILD SHIFT MR LINE
-  NOTIONAL RIGHT OF WAY
- EXISTING TRANSMISSION LINE
 -  230 KV
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**REALIGNMENT
AT SECTIONS 18
AND 19, PLATTE
LAKE TOWNSHIP**

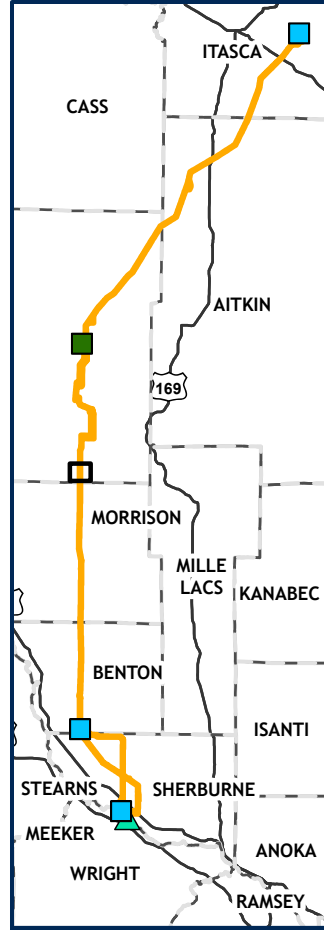
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1/9/2025

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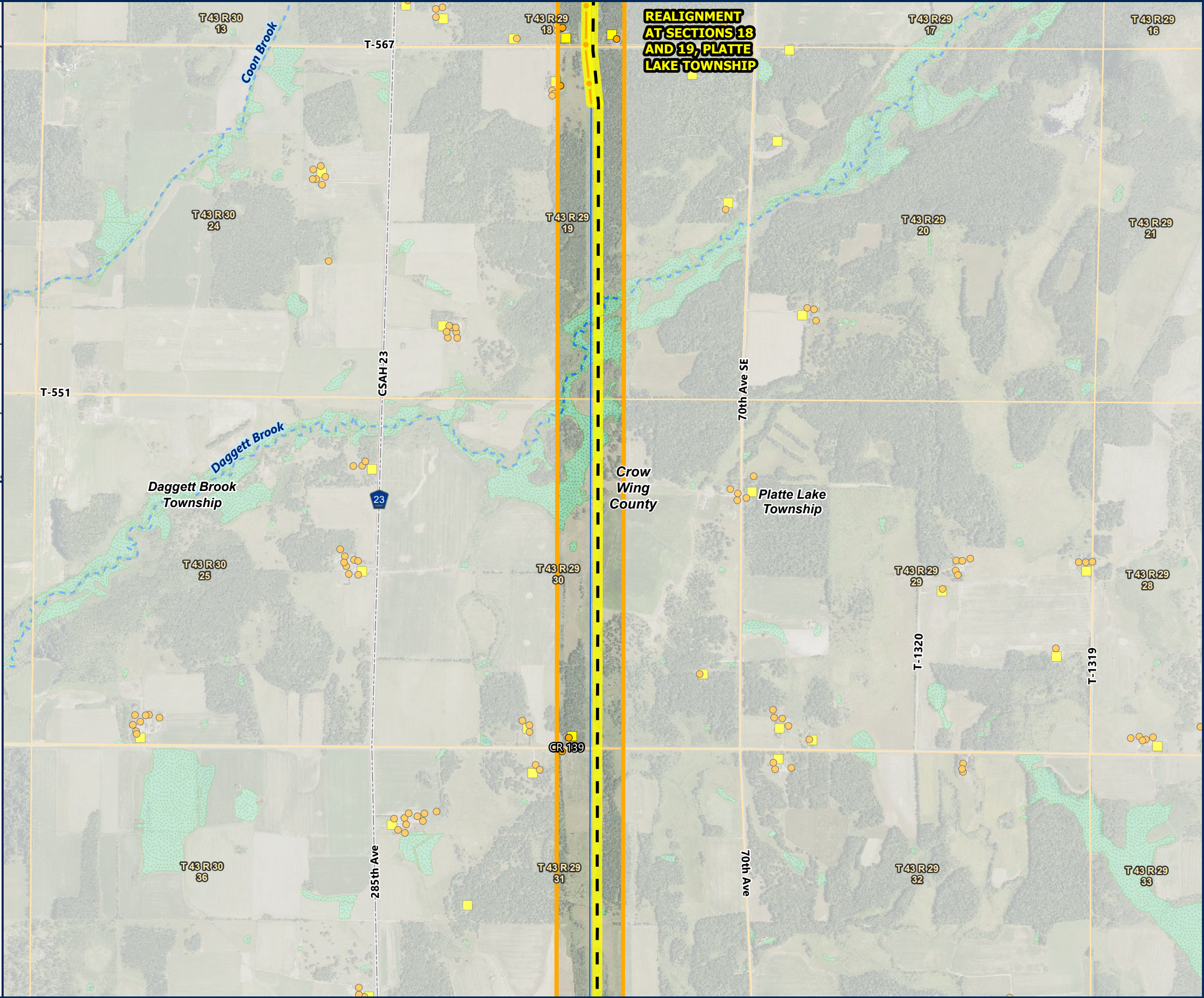


**REALIGNMENT
AT SECTIONS 18
AND 19, PLATTE
LAKE TOWNSHIP**

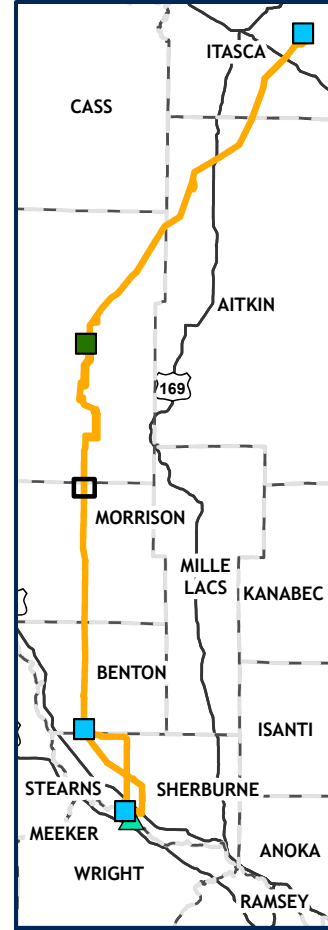
**Detailed Map
Long Lake South to Benton
County Substation
Route East Side
Page 3 of 20**

- CO-LOCATION MAXIMIZATION ROUTE
- NOTIONAL NRP CENTERLINE
- NOTIONAL REBUILD SHIFT MR LINE
- NOTIONAL RIGHT OF WAY
- EXISTING TRANSMISSION LINE
 - 230 KV
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Northland Reliability Project



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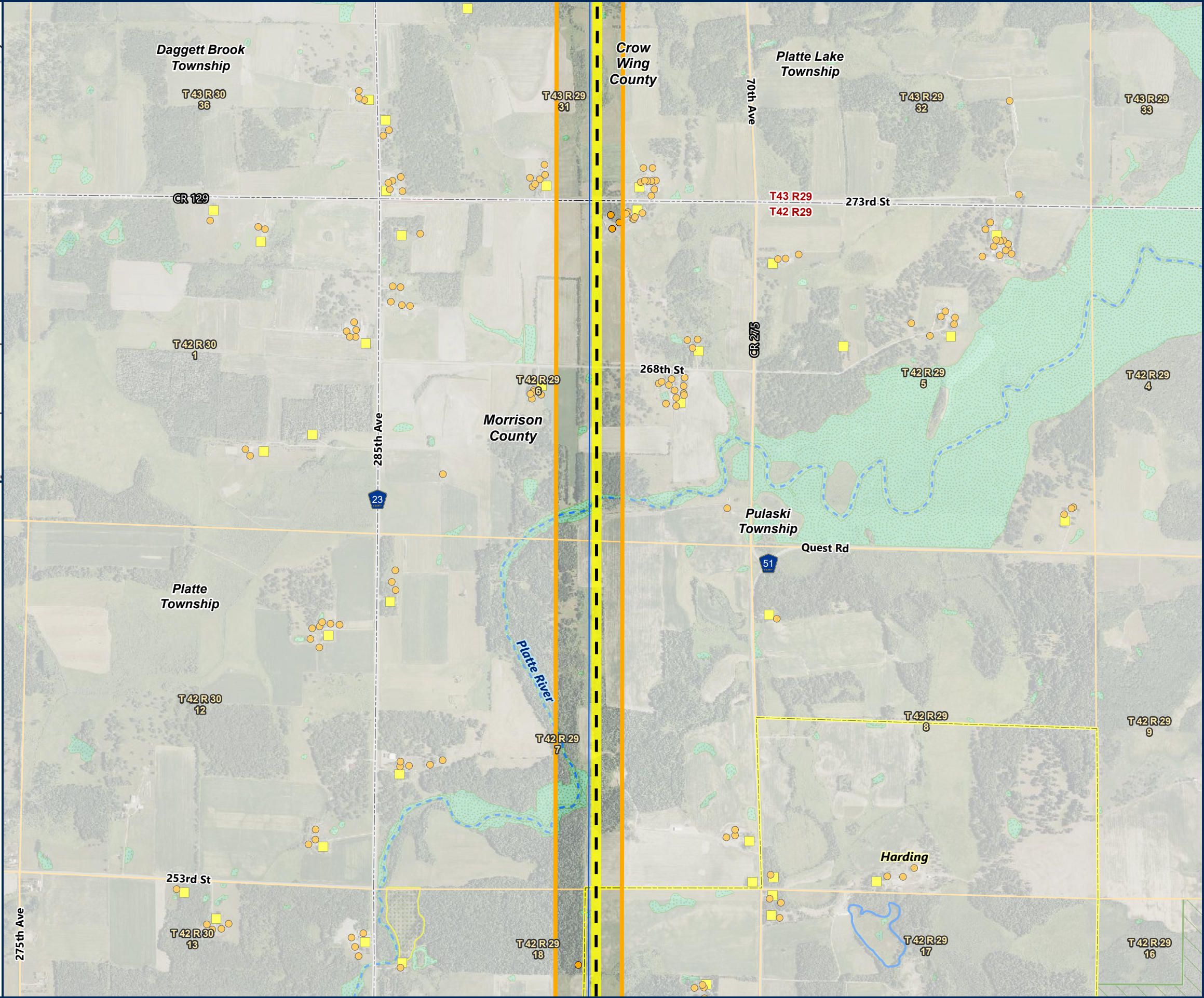


**Detailed Map
Long Lake South to Benton
County Substation
Route East Side
Page 4 of 20**

- CO-LOCATION MAXIMIZATION ROUTE
- NOTIONAL NRP CENTERLINE
- NOTIONAL RIGHT OF WAY
- EXISTING TRANSMISSION LINE
 - 230 KV
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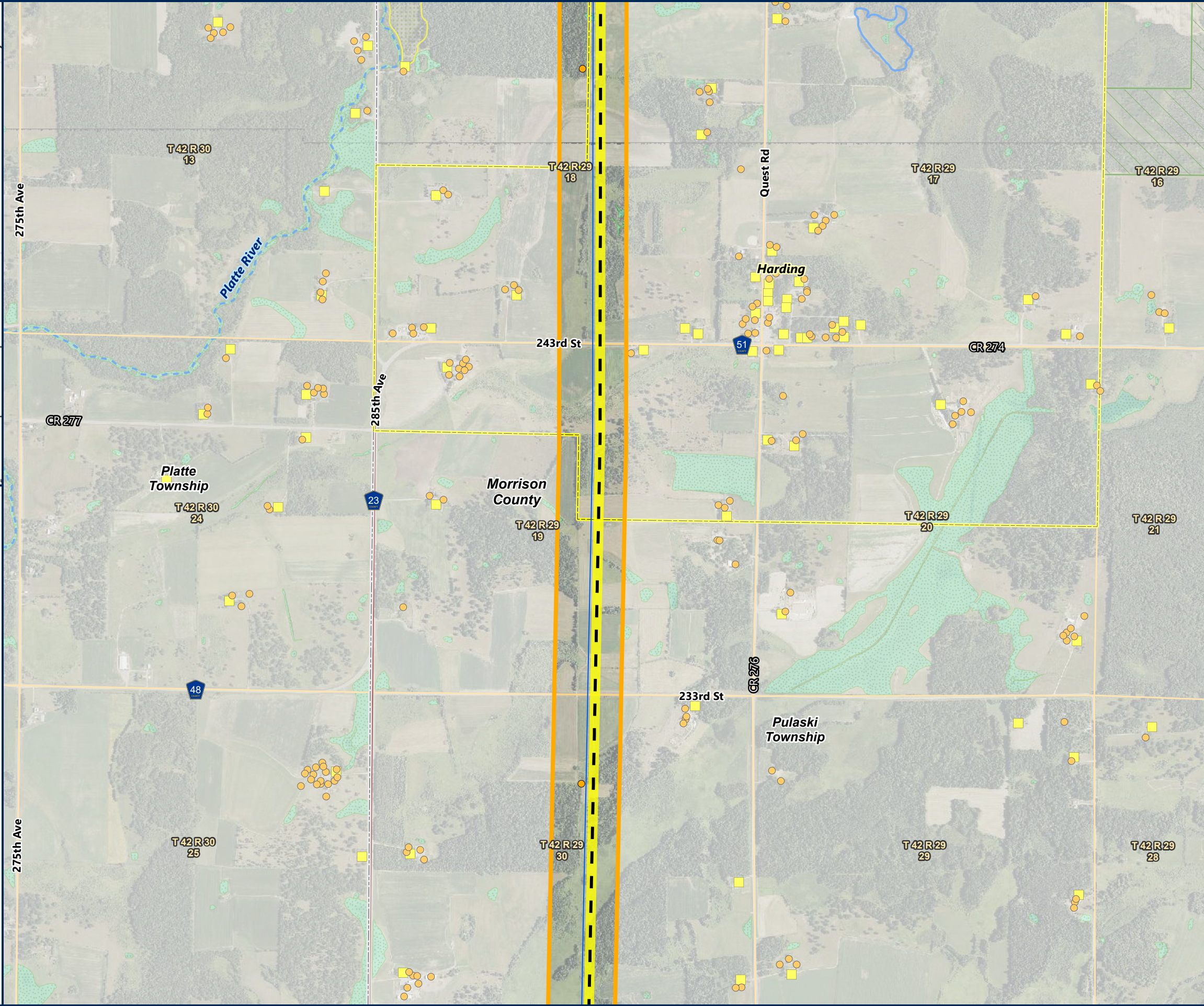
Northland Reliability Project



1/9/2025

Detailed Map Long Lake South to Benton County Substation Route East Side Page 5 of 20

-  CO-LOCATION MAXIMIZATION ROUTE
-  NOTIONAL NRP CENTERLINE
-  NOTIONAL RIGHT OF WAY
- EXISTING TRANSMISSION LINE
 -  230 KV
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Northland Reliability Project



Detailed Map Long Lake South to Benton County Substation Route East Side Page 6 of 20

-  CO-LOCATION MAXIMIZATION ROUTE
-  NOTIONAL NRP CENTERLINE
-  NOTIONAL RIGHT OF WAY
- EXISTING TRANSMISSION LINE
-  230 KV
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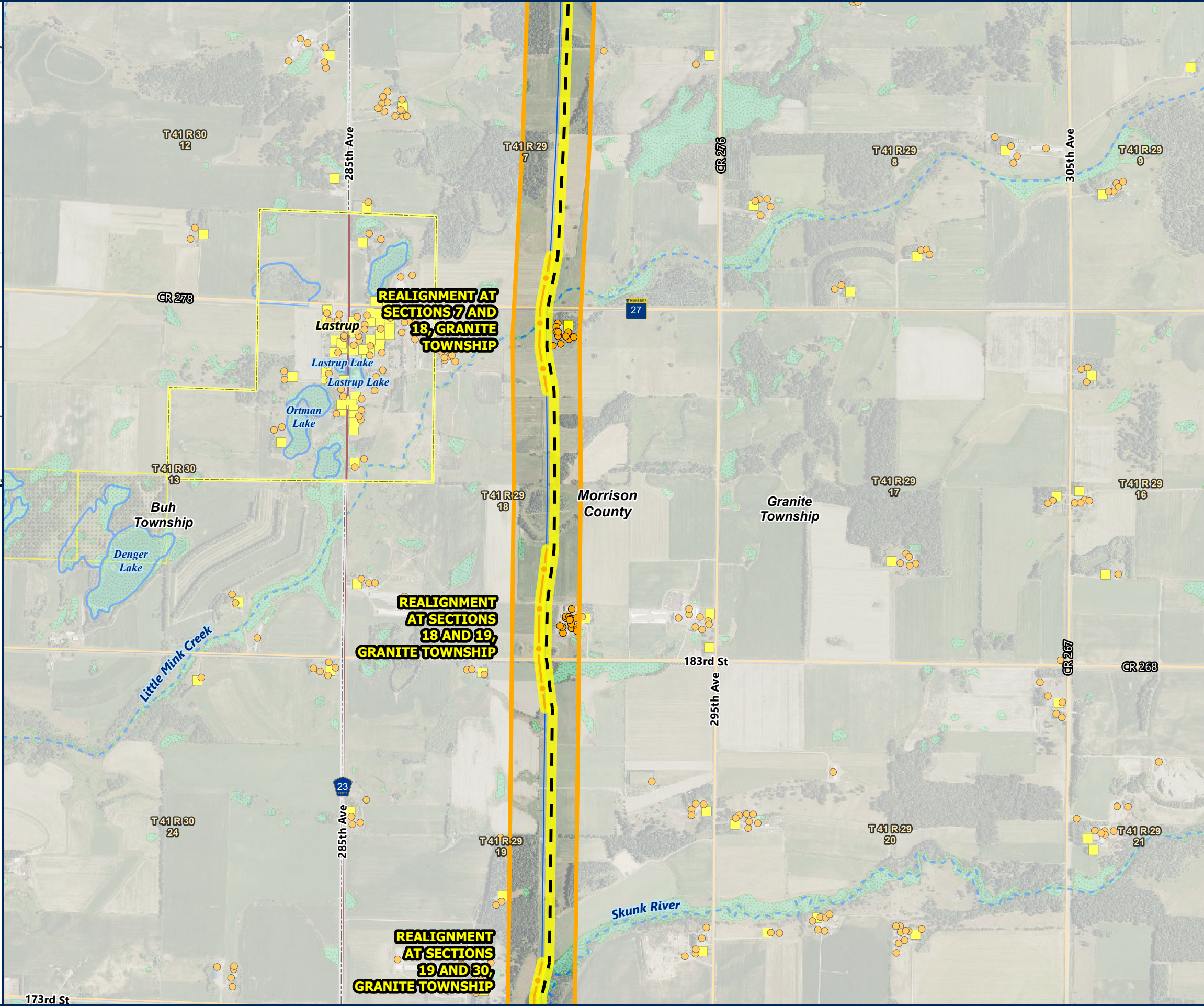
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Northland Reliability Project



Detailed Map Long Lake South to Benton County Substation Route East Side Page 7 of 20

-  CO-LOCATION MAXIMIZATION ROUTE
-  NOTIONAL NRP CENTERLINE
-  NOTIONAL REBUILD SHIFT MR LINE
-  NOTIONAL RIGHT OF WAY
- EXISTING TRANSMISSION LINE
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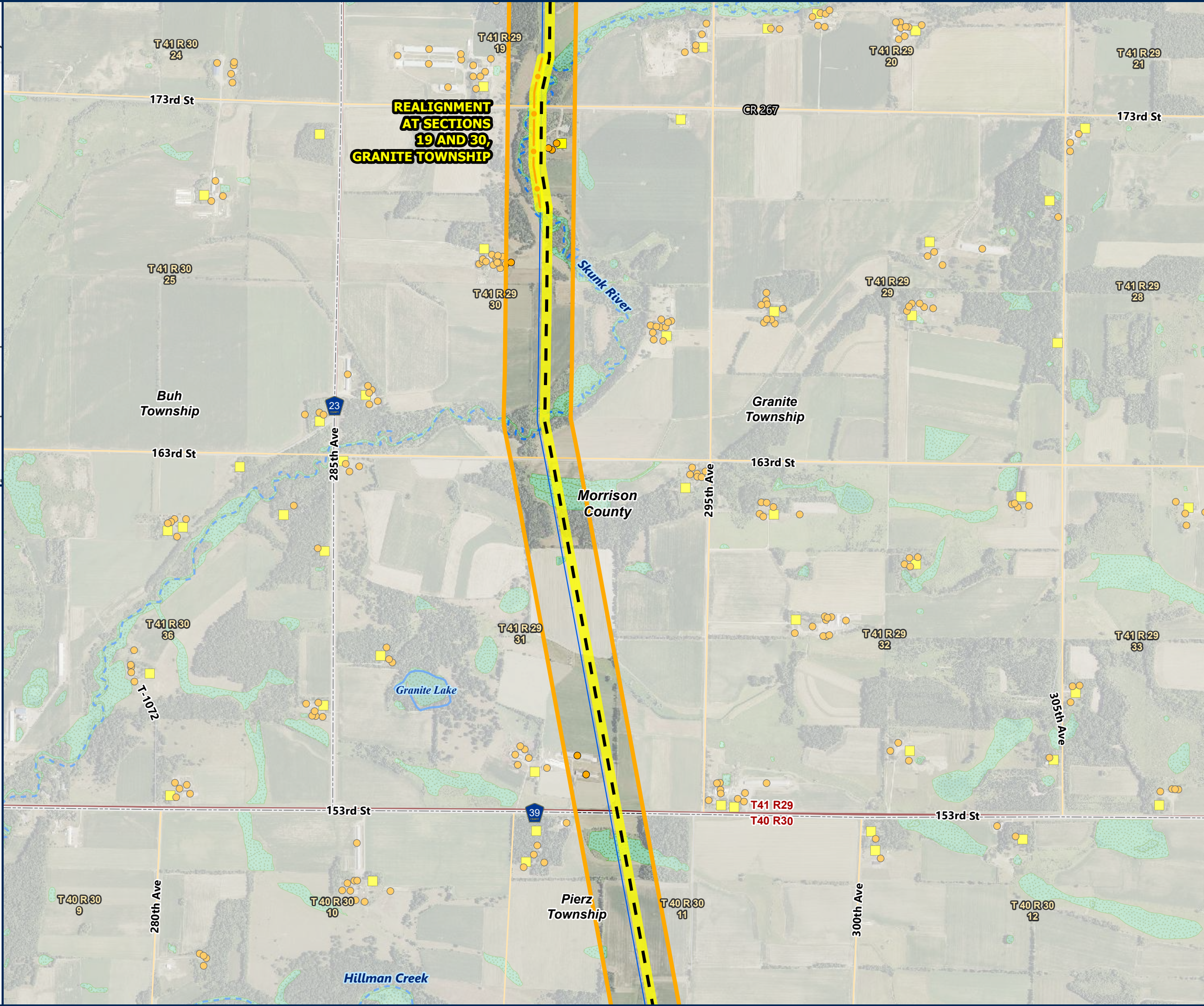
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Detailed Map Long Lake South to Benton County Substation Route East Side Page 8 of 20

-  CO-LOCATION MAXIMIZATION ROUTE
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**REALIGNMENT
AT SECTIONS
19 AND 30,
GRANITE TOWNSHIP**

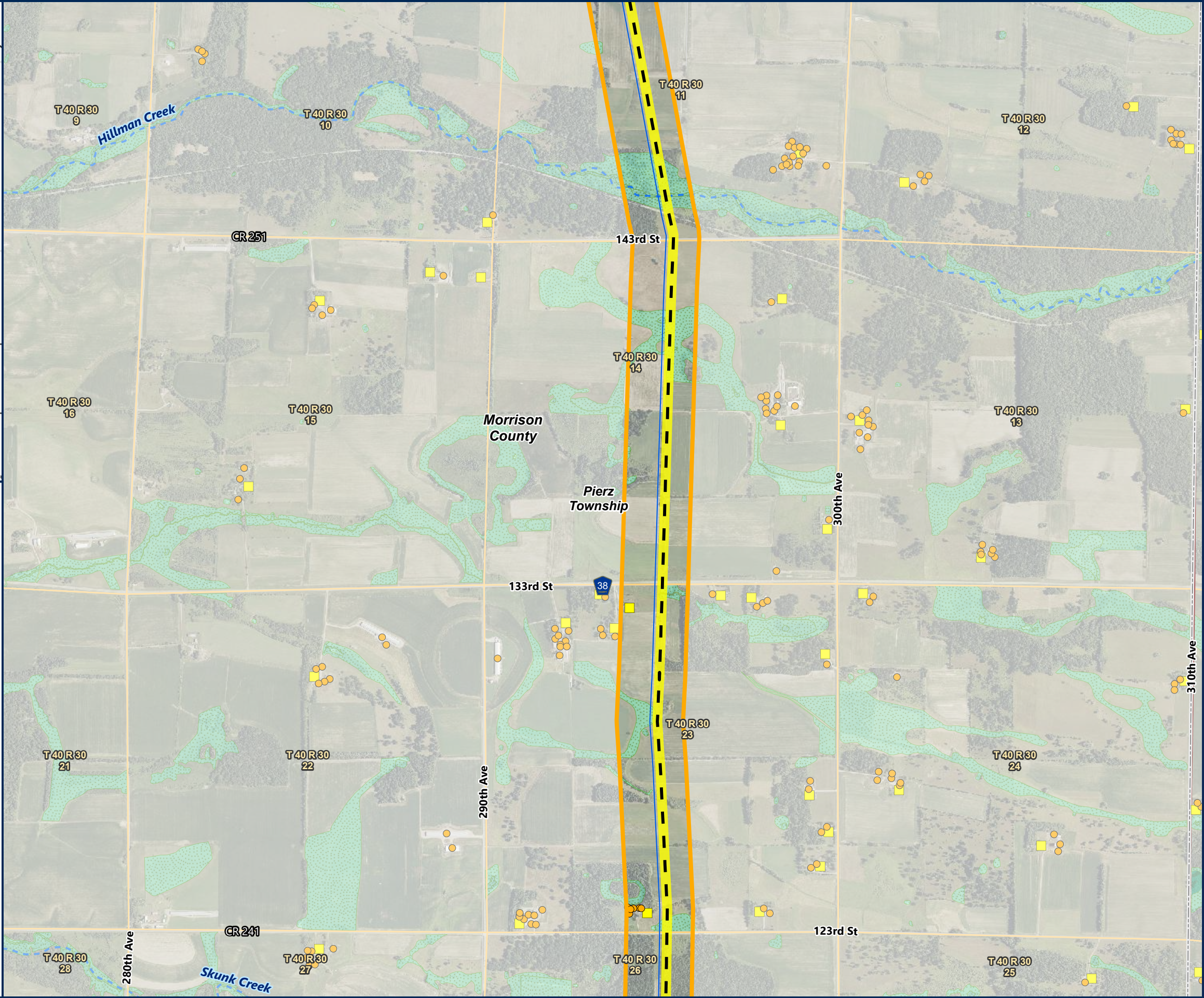
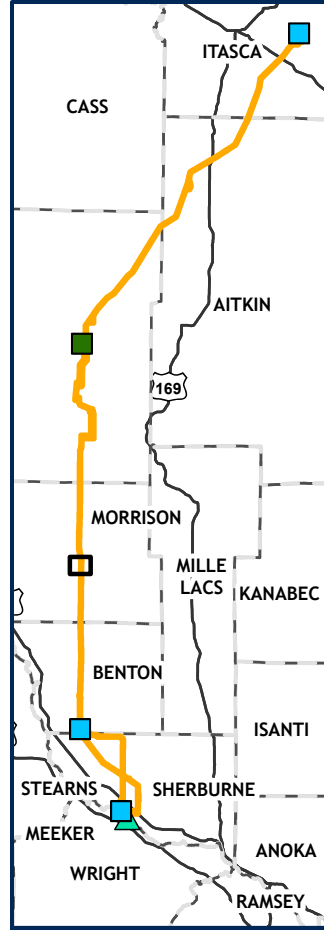
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Northland Reliability Project



Detailed Map Long Lake South to Benton County Substation Route East Side Page 9 of 20

-  CO-LOCATION MAXIMIZATION ROUTE
-  NOTIONAL NRP CENTERLINE
-  NOTIONAL RIGHT OF WAY
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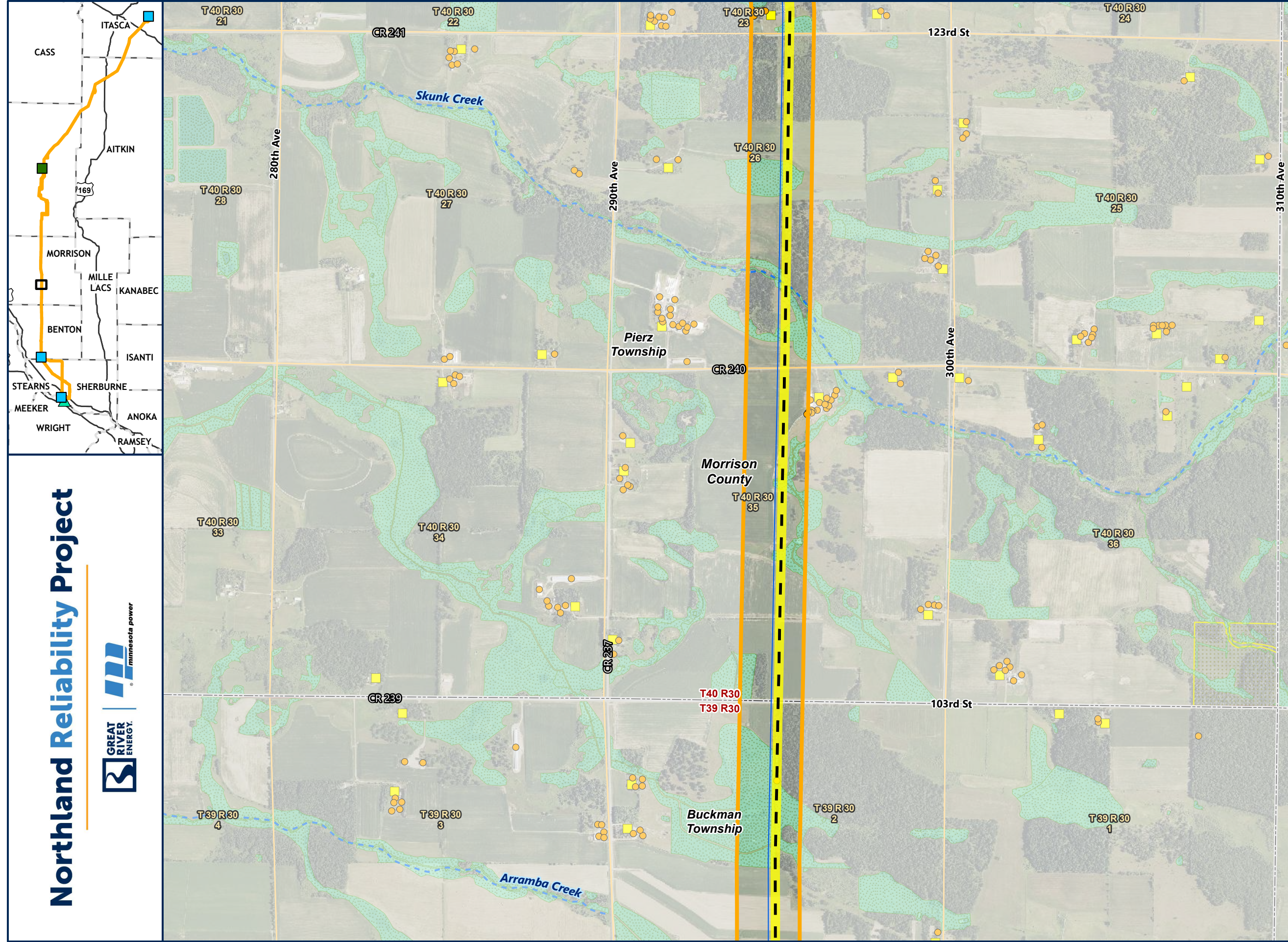


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Detailed Map Long Lake South to Benton County Substation Route East Side Page 10 of 20
















- CO-LOCATION MAXIMIZATION ROUTE
- NOTIONAL NRP CENTERLINE
- NOTIONAL RIGHT OF WAY
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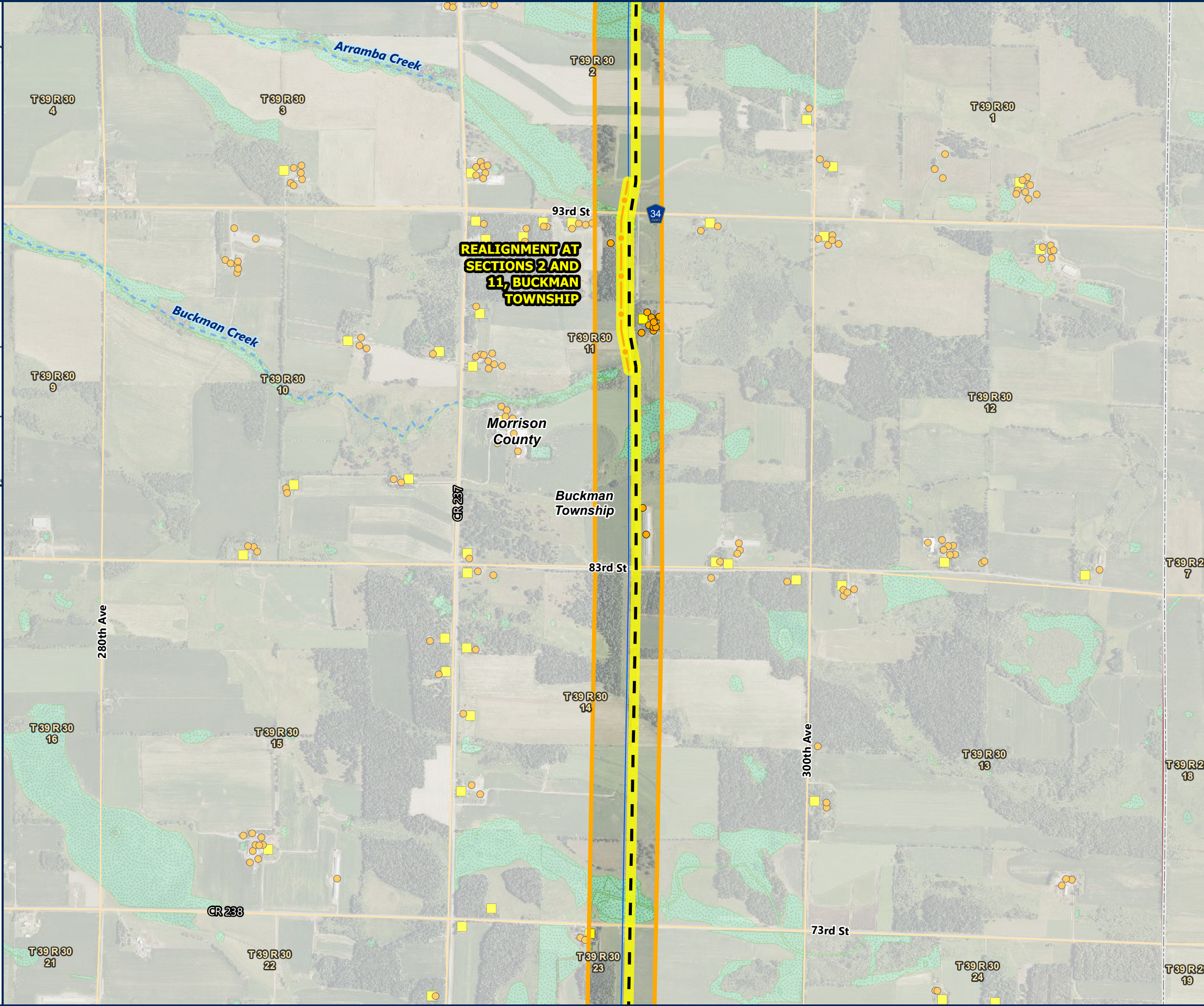


Northland Reliability Project



Detailed Map Long Lake South to Benton County Substation Route East Side Page 11 of 20

-  CO-LOCATION MAXIMIZATION ROUTE
-  NOTIONAL NRP CENTERLINE
-  NOTIONAL REBUILD SHIFT MR LINE
-  NOTIONAL RIGHT OF WAY
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 -  FEDERAL CONSERVATION EASEMENT
 -  AQUATIC MANAGEMENT AREA
 -  STATE FOREST
 -  STATE PARK
 -  OTHER DNR LAND
 -  COUNTY BOUNDARY



**REALIGNMENT AT
SECTIONS 2 AND
11, BUCKMAN
TOWNSHIP**

*Morrison
County*

*Buckman
Township*

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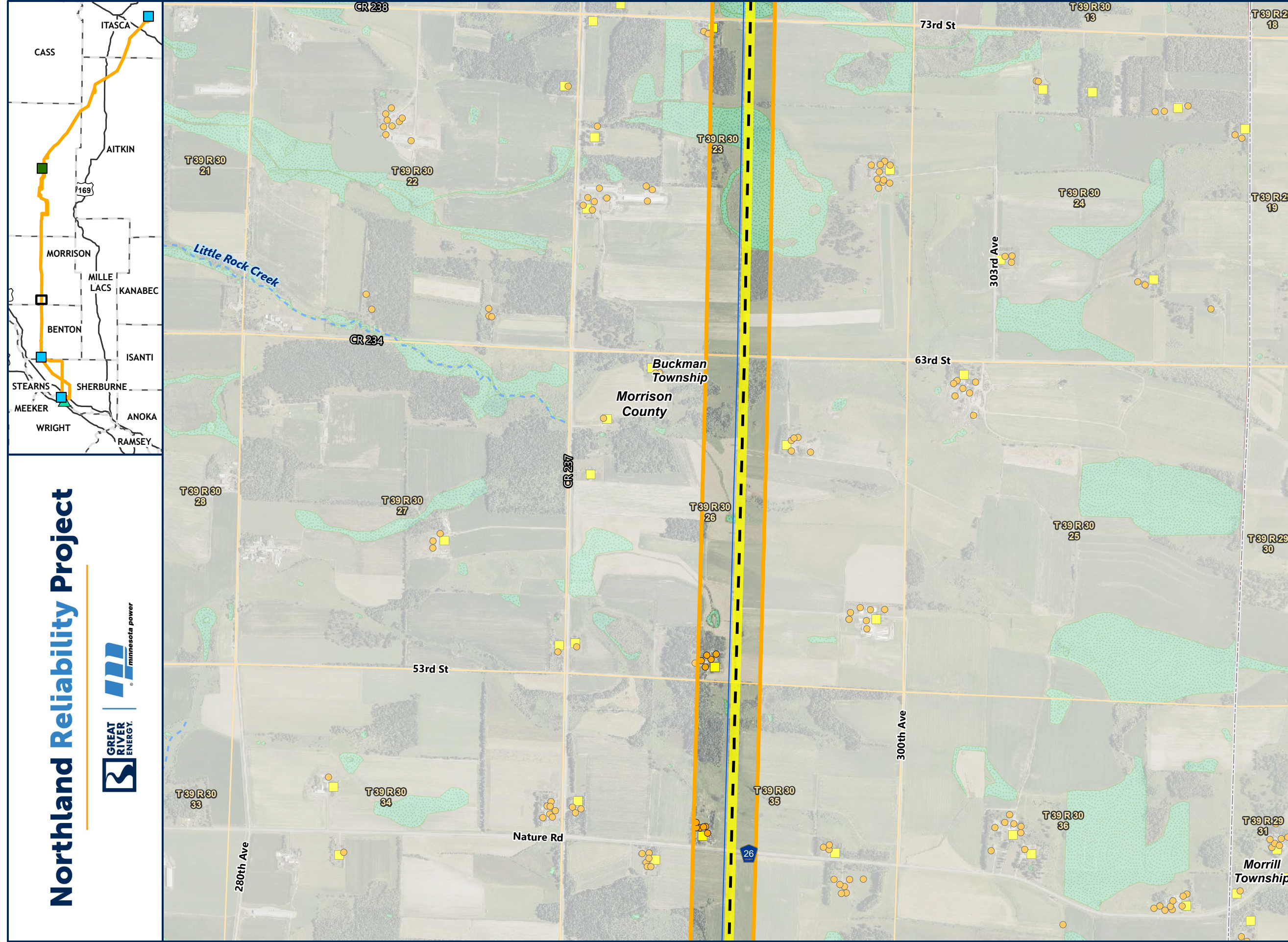
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Detailed Map Long Lake South to Benton County Substation Route East Side Page 12 of 20

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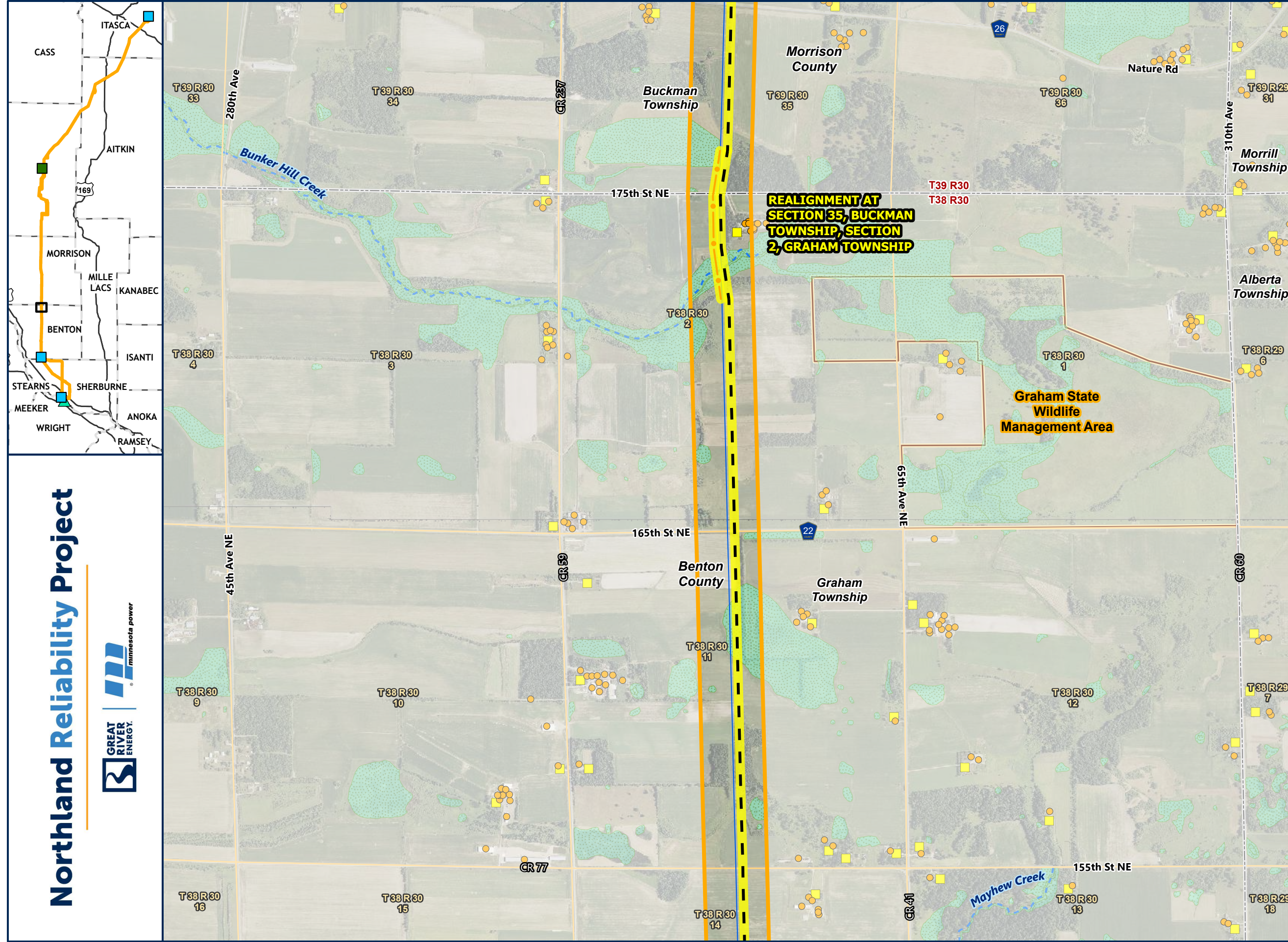


Northland Reliability Project



Detailed Map Long Lake South to Benton County Substation Route East Side Page 13 of 20

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**REALIGNMENT AT
SECTION 35, BUCKMAN
TOWNSHIP, SECTION
2, GRAHAM TOWNSHIP**

**Graham State
Wildlife
Management Area**

- CO-LOCATION MAXIMIZATION ROUTE
- NOTIONAL NRP CENTERLINE
- NOTIONAL REBUILD SHIFT MR LINE
- NOTIONAL RIGHT OF WAY
- EXISTING TRANSMISSION LINE
- 230 KV
- SUBSTATION SITING AREA
- BIG OAKS SUBSTATION AREA
- RESIDENCE
- NOT A RESIDENCE
- PWI WATERCOURSE
- PWI WATERBODY
- NON-FORESTED WETLAND
- FORESTED WETLAND
- WILDLIFE MANAGEMENT AREA
- STATE CONSERVATION EASEMENT
- FEDERAL CONSERVATION EASEMENT
- AQUATIC MANAGEMENT AREA
- STATE FOREST
- STATE PARK
- OTHER DNR LAND
- COUNTY BOUNDARY

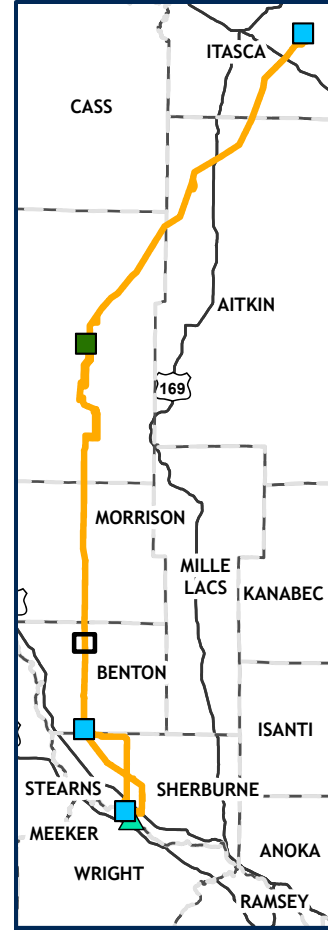
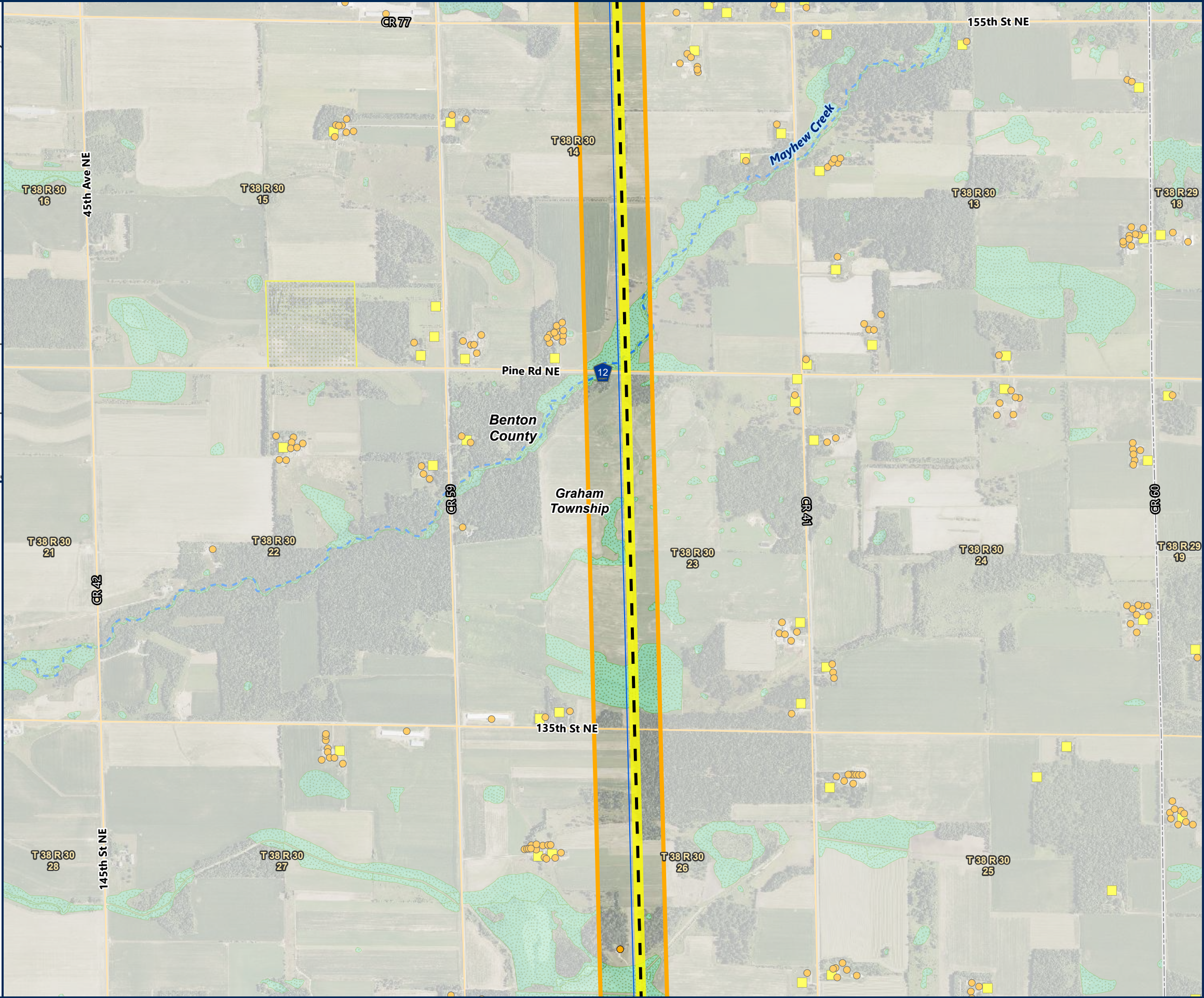


Northland Reliability Project



Detailed Map Long Lake South to Benton County Substation Route East Side Page 14 of 20

-  CO-LOCATION MAXIMIZATION ROUTE
-  NOTIONAL NRP CENTERLINE
-  NOTIONAL RIGHT OF WAY
-  EXISTING TRANSMISSION LINE
-  230 KV
-  SUBSTATION SITING AREA
-  BIG OAKS SUBSTATION AREA
-  RESIDENCE
-  NOT A RESIDENCE
-  PWI WATERCOURSE
-  PWI WATERBODY
-  NON-FORESTED WETLAND
-  FORESTED WETLAND
-  WILDLIFE MANAGEMENT AREA
-  STATE CONSERVATION EASEMENT
-  FEDERAL CONSERVATION EASEMENT
-  AQUATIC MANAGEMENT AREA
-  STATE FOREST
-  STATE PARK
-  OTHER DNR LAND
-  COUNTY BOUNDARY



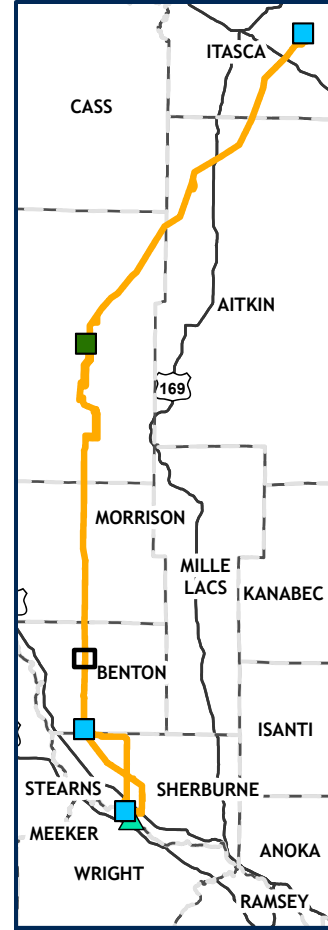
Northland Reliability Project



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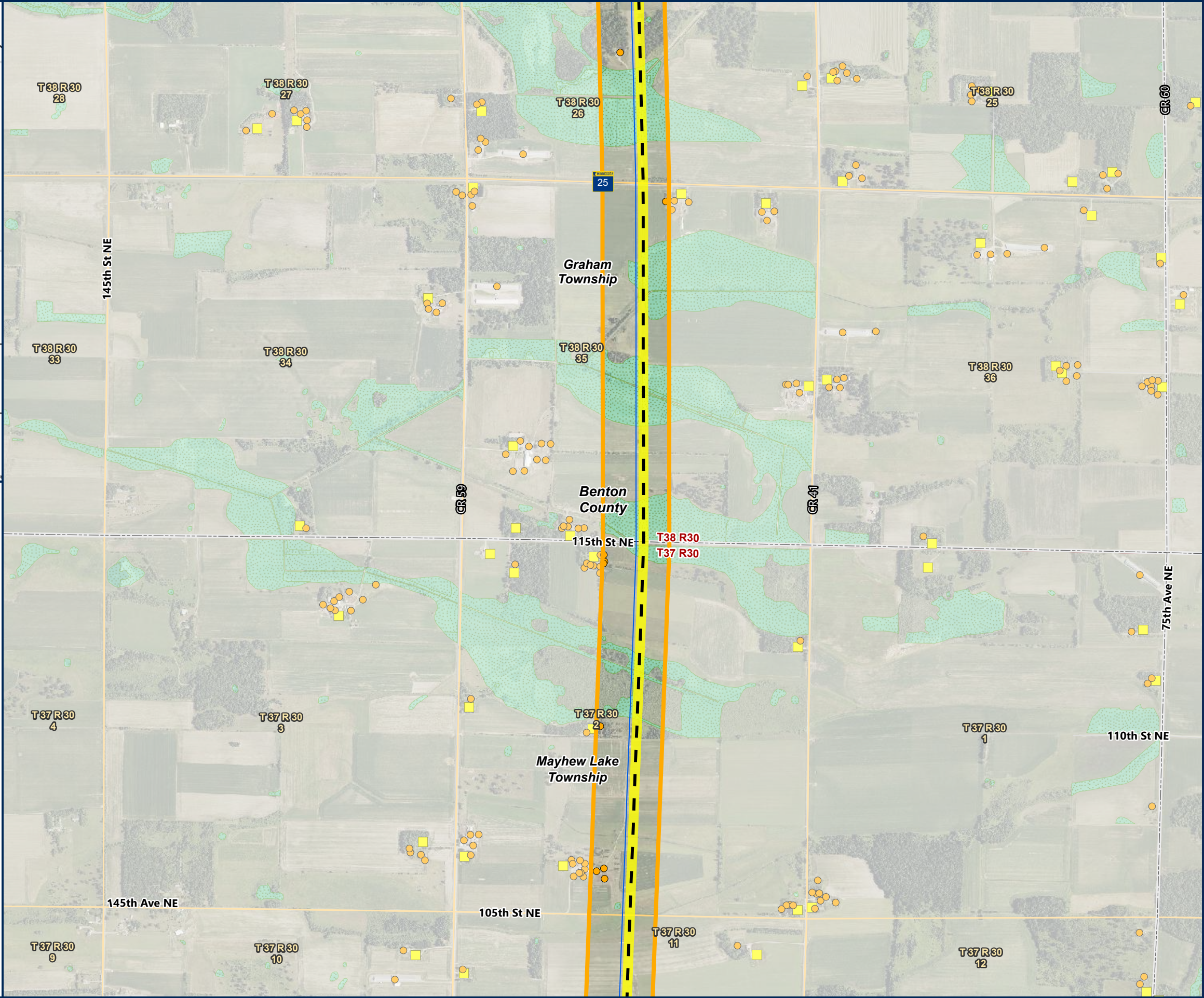
Detailed Map Long Lake South to Benton County Substation Route East Side Page 15 of 20

-  CO-LOCATION MAXIMIZATION ROUTE
-  NOTIONAL NRP CENTERLINE
-  NOTIONAL RIGHT OF WAY
- EXISTING TRANSMISSION LINE
 -  230 KV
-  SUBSTATION SITING AREA
-  BIG OAKS SUBSTATION AREA
-  RESIDENCE
-  NOT A RESIDENCE
-  PWI WATERCOURSE
-  PWI WATERBODY
-  NON-FORESTED WETLAND
-  FORESTED WETLAND
-  WILDLIFE MANAGEMENT AREA
-  STATE CONSERVATION EASEMENT
-  FEDERAL CONSERVATION EASEMENT
-  AQUATIC MANAGEMENT AREA
-  STATE FOREST
-  STATE PARK
-  OTHER DNR LAND
-  COUNTY BOUNDARY


















Northland Reliability Project

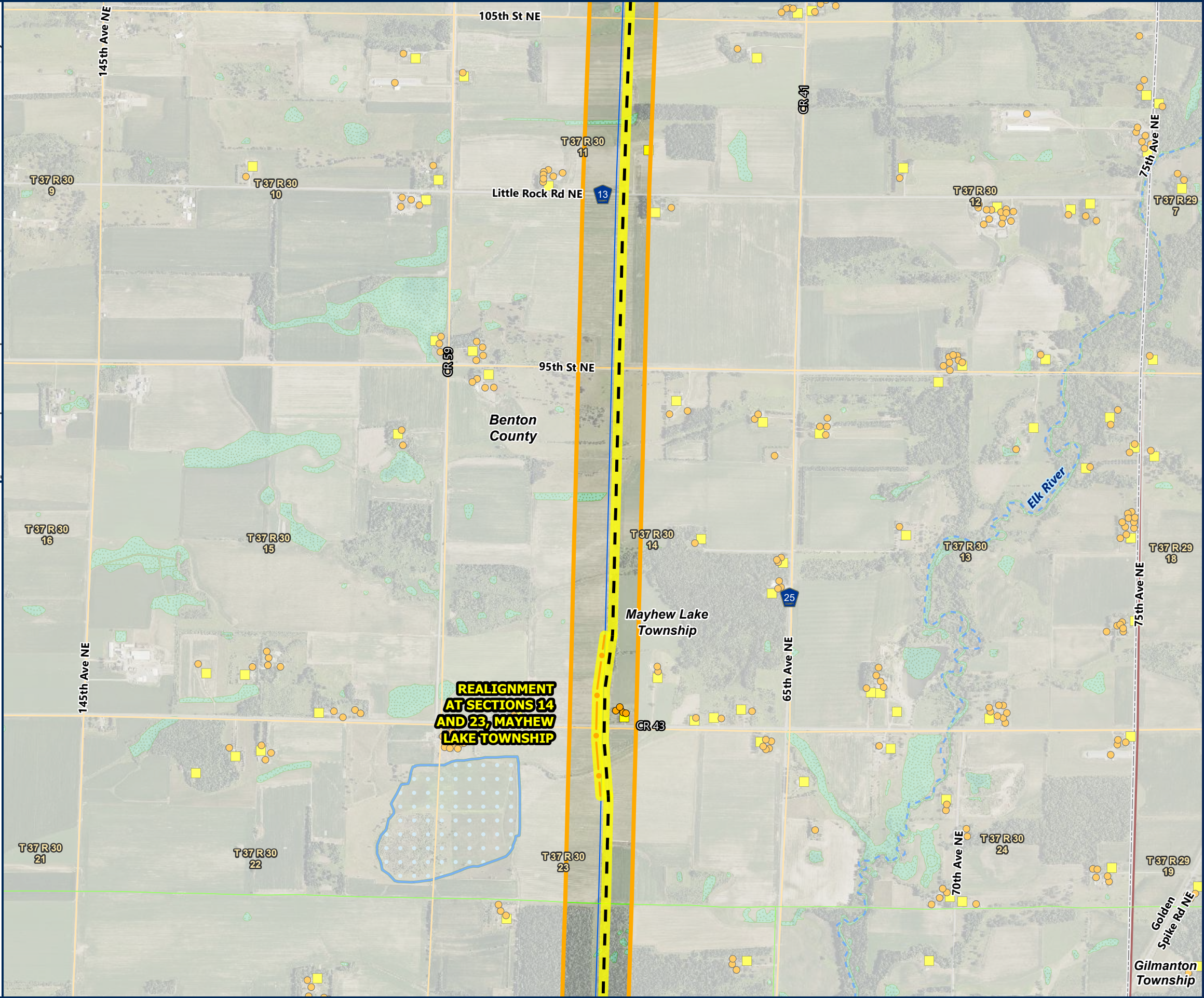




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Detailed Map Long Lake South to Benton County Substation Route East Side Page 16 of 20

-  CO-LOCATION MAXIMIZATION ROUTE
-  NOTIONAL NRP CENTERLINE
-  NOTIONAL REBUILD SHIFT MR LINE
-  NOTIONAL RIGHT OF WAY
- EXISTING TRANSMISSION LINE
 -  69 KV
 -  230 KV
-  SUBSTATION SITING AREA
-  BIG OAKS SUBSTATION AREA
-  RESIDENCE
-  NOT A RESIDENCE
-  PWI WATERCOURSE
-  PWI WATERBODY
-  NON-FORESTED WETLAND
-  FORESTED WETLAND
-  WILDLIFE MANAGEMENT AREA
-  STATE CONSERVATION EASEMENT
-  FEDERAL CONSERVATION EASEMENT
-  AQUATIC MANAGEMENT AREA
-  STATE FOREST
-  STATE PARK
-  OTHER DNR LAND
-  COUNTY BOUNDARY



**REALIGNMENT
AT SECTIONS 14
AND 23, MAYHEW
LAKE TOWNSHIP**

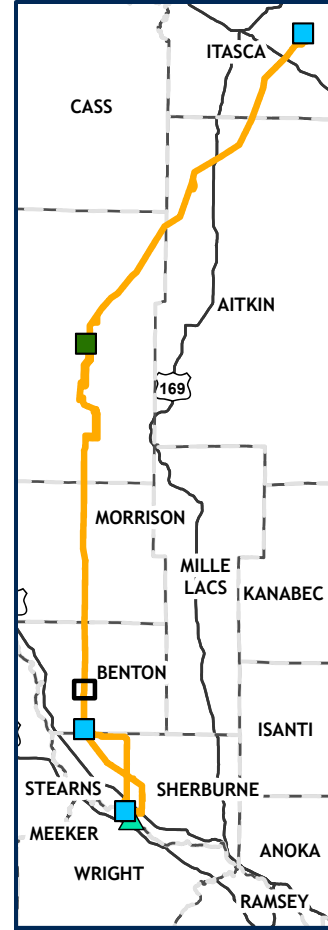
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Northland Reliability Project



Detailed Map Long Lake South to Benton County Substation Route East Side Page 17 of 20

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Northland Reliability Project



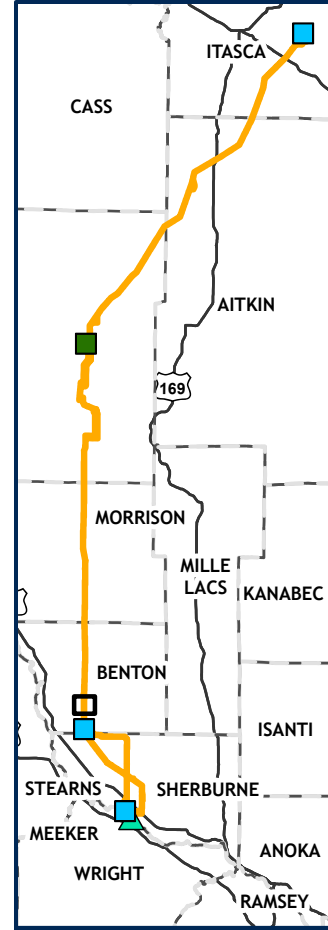
- CO-LOCATION MAXIMIZATION ROUTE
- NOTIONAL NRP CENTERLINE
- NOTIONAL REBUILD SHIFT MR LINE
- SHIFT DOUBLE-CIRCUIT 230/69KV (MR LINE/BP LINE)
- NOTIONAL RIGHT OF WAY
- EXISTING TRANSMISSION LINE**
 - 69 KV
 - 230 KV
- SUBSTATION SITING AREA
- BIG OAKS SUBSTATION AREA
- RESIDENCE
- NOT A RESIDENCE
- PWI WATERCOURSE
- PWI WATERBODY
- NON-FORESTED WETLAND
- FORESTED WETLAND
- WILDLIFE MANAGEMENT AREA
- STATE CONSERVATION EASEMENT
- FEDERAL CONSERVATION EASEMENT
- AQUATIC MANAGEMENT AREA
- STATE FOREST
- STATE PARK
- OTHER DNR LAND
- COUNTY BOUNDARY



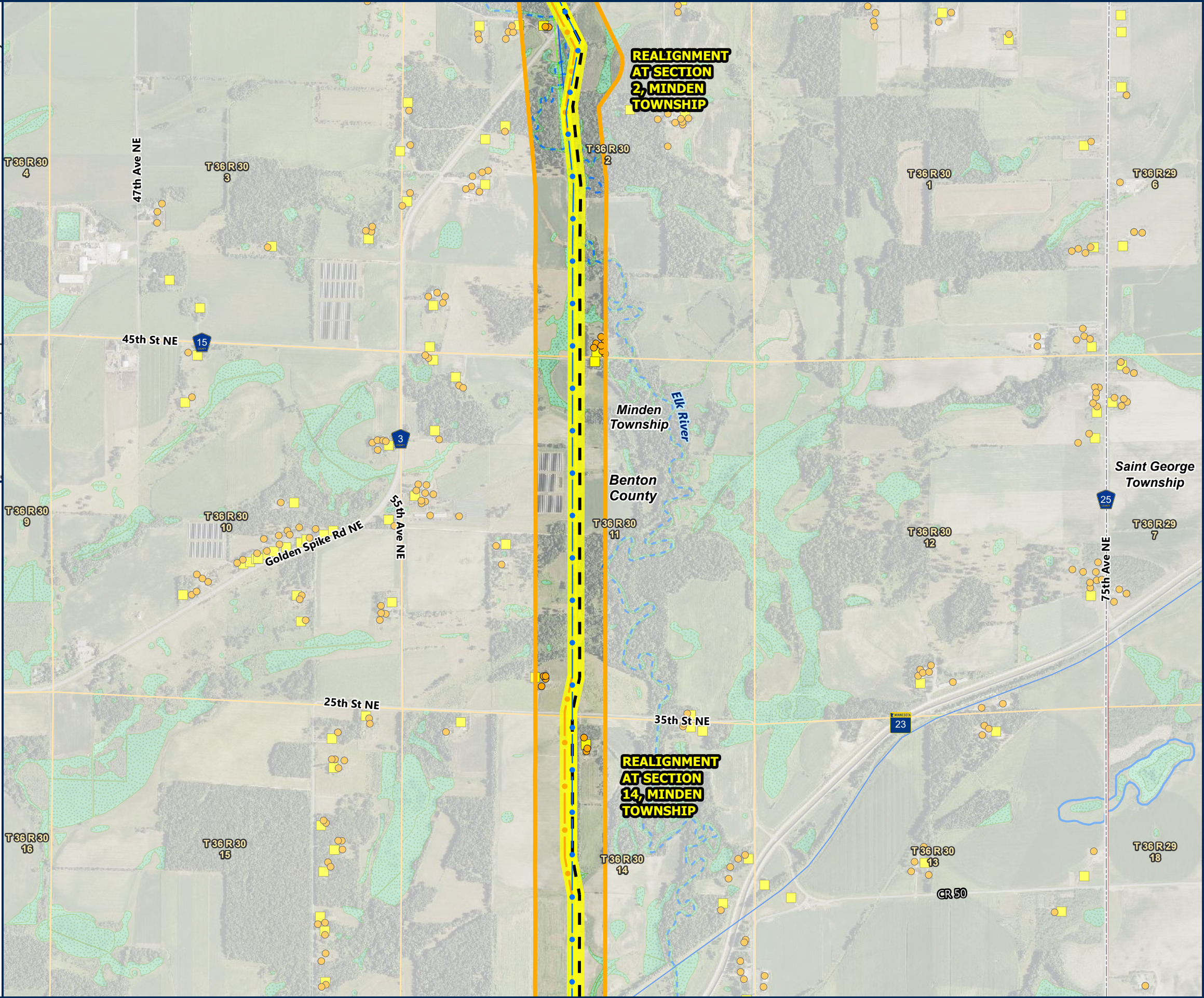
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Detailed Map Long Lake South to Benton County Substation Route East Side Page 18 of 20

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Northland Reliability Project

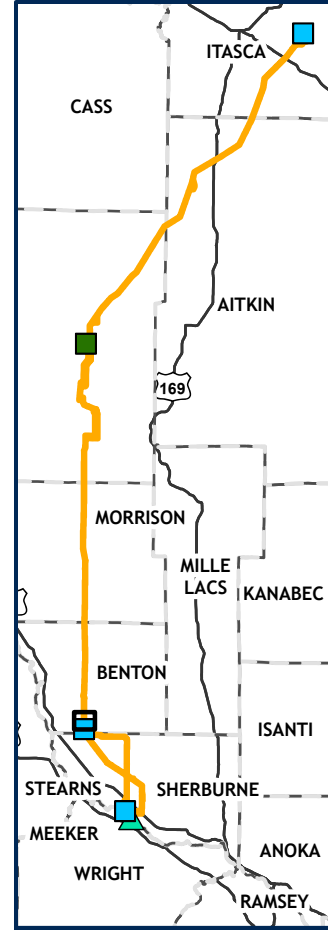


- CO-LOCATION MAXIMIZATION ROUTE
- NOTIONAL NRP CENTERLINE
- NOTIONAL REBUILD SHIFT MR LINE
- SHIFT DOUBLE-CIRCUIT 230/69KV (MR LINE/BP LINE)
- NOTIONAL RIGHT OF WAY
- EXISTING TRANSMISSION LINE**
 - 69 KV
 - 230 KV
- SUBSTATION SITING AREA
- BIG OAKS SUBSTATION AREA
- RESIDENCE
- NOT A RESIDENCE
- PWI WATERCOURSE
- PWI WATERBODY
- NON-FORESTED WETLAND
- FORESTED WETLAND
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- STATE CONSERVATION EASEMENT
- FEDERAL CONSERVATION EASEMENT
- AQUATIC MANAGEMENT AREA
- STATE FOREST
- STATE PARK
- OTHER DNR LAND
- COUNTY BOUNDARY

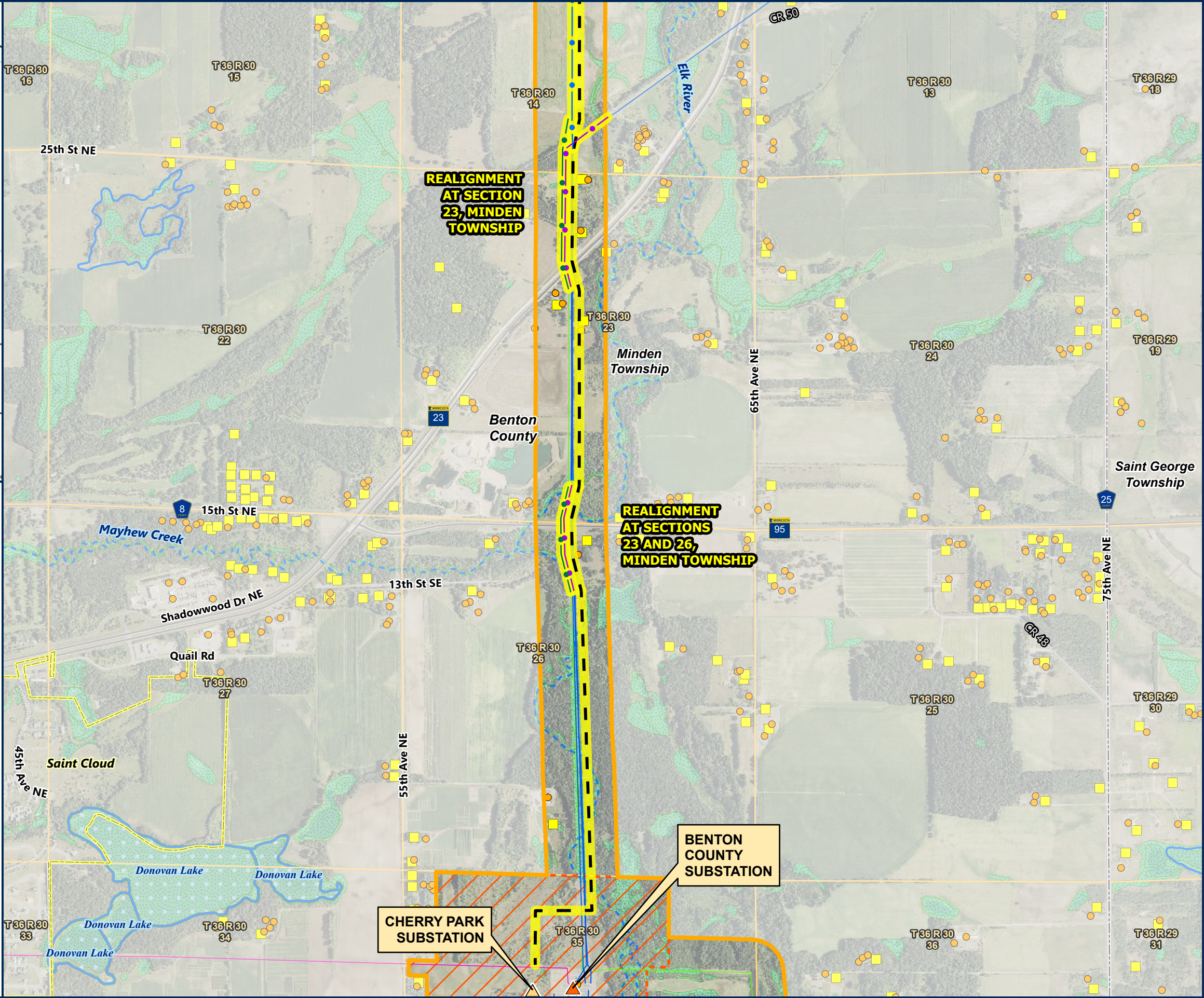


Detailed Map Long Lake South to Benton County Substation Route East Side Page 19 of 20

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Northland Reliability Project

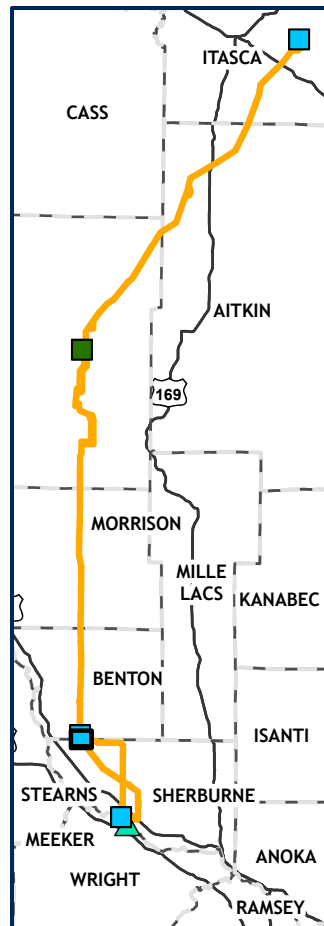


- CO-LOCATION MAXIMIZATION ROUTE
 - NOTIONAL NRP CENTERLINE
 - NOTIONAL REBUILD SHIFT MRX LINE
 - NOTIONAL SHIFT DOUBLE-CIRCUIT 230/69KV (MR LINE/BP LINE)
 - SHIFT DOUBLE-CIRCUIT 230/69KV (MR LINE/BP LINE)
 - NOTIONAL RIGHT OF WAY
- EXISTING TRANSMISSION LINE
- 69 KV
 - 115 KV
 - 230 KV
 - 345 KV OR GREATER
- SUBSTATION SITING AREA
 - BIG OAKS SUBSTATION AREA
 - BENTON COUNTY SUBSTATION
 - CHERRY PARK SUBSTATION
 - RESIDENCE
 - NOT A RESIDENCE
 - PWI WATERCOURSE
 - PWI WATERBODY
 - NON-FORESTED WETLAND
 - FORESTED WETLAND
 - WILDLIFE MANAGEMENT AREA
 - STATE CONSERVATION EASEMENT
 - FEDERAL CONSERVATION EASEMENT
 - AQUATIC MANAGEMENT AREA
 - STATE FOREST
 - STATE PARK
 - OTHER DNR LAND
 - COUNTY BOUNDARY
 - MUNICIPAL BOUNDARY



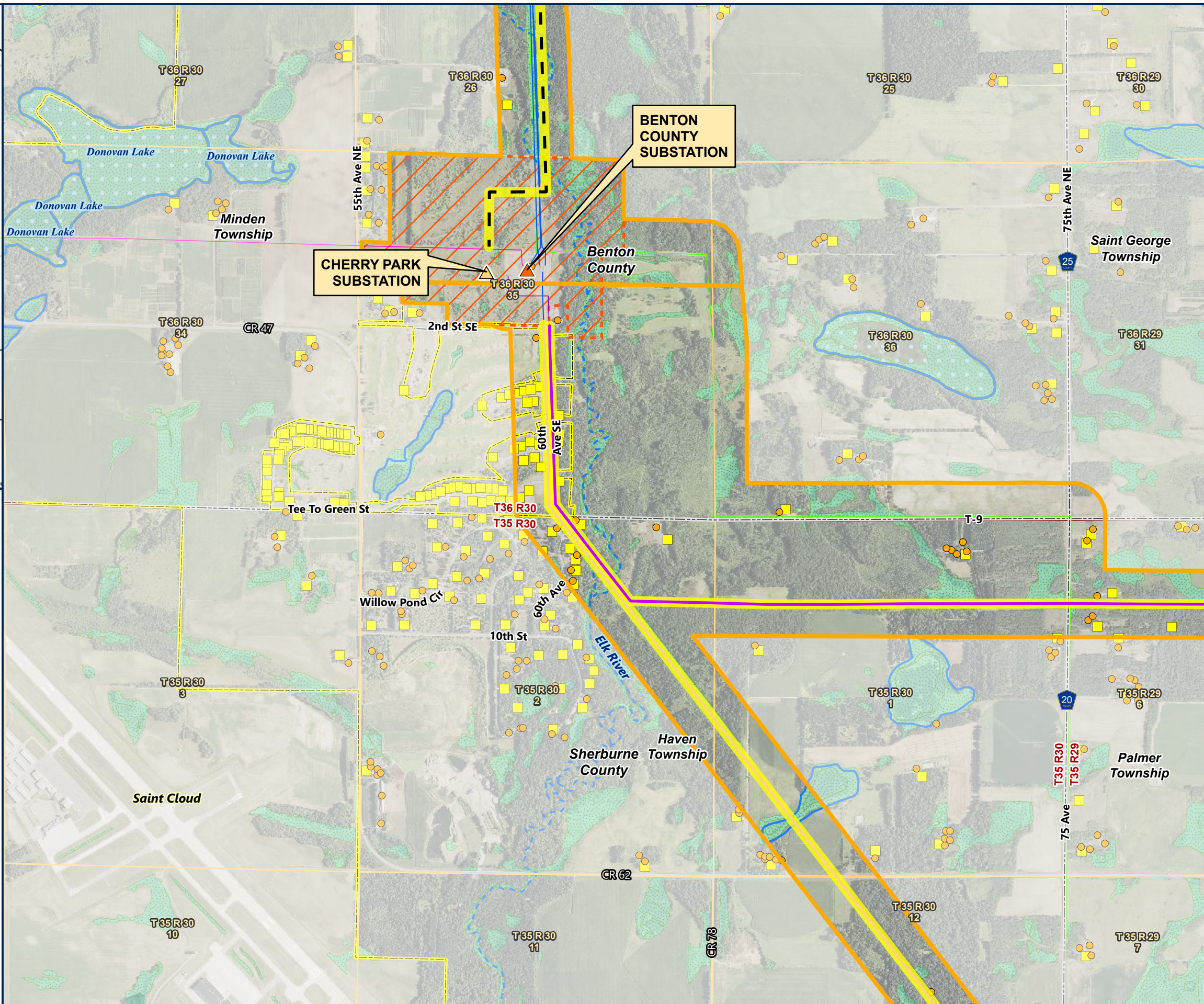
Detailed Map Long Lake South to Benton County Substation Route East Side Page 20 of 20

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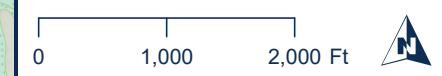


Northland Reliability Project





- CO-LOCATION MAXIMIZATION ROUTE
- NOTIONAL NRP CENTERLINE
- REPLACE GRE-BS LINE
- REPLACE MR LINE
- NOTIONAL RIGHT OF WAY
- EXISTING TRANSMISSION LINE
 - 69 KV
 - 115 KV
 - 230 KV
 - 345 KV OR GREATER
- SUBSTATION SITING AREA
- BIG OAKS SUBSTATION AREA
- BENTON COUNTY SUBSTATION
- CHERRY PARK SUBSTATION
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- FEDERAL CONSERVATION EASEMENT
- AQUATIC MANAGEMENT AREA
- STATE FOREST
- STATE PARK
- OTHER DNR LAND
- COUNTY BOUNDARY
- MUNICIPAL BOUNDARY



IN THE MATTER OF THE APPLICATION OF
MINNESOTA POWER AND GREAT RIVER
ENERGY FOR A CERTIFICATE OF NEED AND
ROUTE PERMIT FOR THE NORTHLAND
RELIABILITY PROJECT 345 kV
TRANSMISSION LINE

MPUC DOCKET Nos. E015,ET2/CN-22-415
AND E015,ET2/TL-22-416

OAH DOCKET No. 21-2500-39822

CERTIFICATE OF SERVICE

Carly Krause certifies that on the 10th day of January, 2025, on behalf of Minnesota Power and Great River Energy, she filed a true and correct copy of the **Response to the Minnesota Public Utilities Commission's Request for Comment** via [eDockets](#). Said document was also served via U.S. Mail or email as designated on the attached Service Lists on file with the Minnesota Public Utilities Commission in the above-referenced dockets.

/s/ Carly Krause

Carly Krause

| # | First Name | Last Name | Email | Organization | Agency | Address | Delivery Method | Alternate Delivery Method | View Trade Secret | Service List Name |
|----|---------------|--------------------|------------------------------------|---|---|---|--------------------|---------------------------|-------------------|-------------------|
| 1 | Lisa | Agrimonti | lagrimonti@fredlaw.com | Fredrikson & Byron, P.A. | | 60 South Sixth Street Suite 1500 Minneapolis MN, 55402-4400 United States | Electronic Service | | No | 22-415Official |
| 2 | Jim | Atkinson | jbatkinson@allete.com | Minnesota Power | | 30 West Superior Street Duluth MN, 55802 United States | Electronic Service | | No | 22-415Official |
| 3 | Matthew | Brodin | mbrodin@allete.com | Minnesota Power | | 30 West Superior Street Duluth MN, 55802 United States | Electronic Service | | No | 22-415Official |
| 4 | 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 | 22-415Official |
| 5 | MP Regulatory | Compliance | mpregulatorycompliance@mnpower.com | Minnesota Power | | 30 W Superior St. Duluth MN, 55802 United States | Electronic Service | | No | 22-415Official |
| 6 | Brandon | Crawford | brandonc@cubminnesota.org | Citizens Utility Board of Minnesota | | 332 Minnesota St Ste W1360 St. Paul MN, 55101 United States | Electronic Service | | No | 22-415Official |
| 7 | 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 | | No | 22-415Official |
| 8 | Adam | Duininck | aduininck@ncsrcc.org | North Central States Regional Council of Carpenters | | 700 Olive Street St. Paul MN, 55130 United States | Electronic Service | | No | 22-415Official |
| 9 | Bret | Eknes | bret.eknes@state.mn.us | | Public Utilities Commission | Suite 350 121 7th Place East St. Paul MN, 55101-2147 United States | Electronic Service | | No | 22-415Official |
| 10 | Sharon | Ferguson | sharon.ferguson@state.mn.us | | Department of Commerce | 85 7th Place E Ste 280 Saint Paul MN, 55101-2198 United States | Electronic Service | | No | 22-415Official |

| # | First Name | Last Name | Email | Organization | Agency | Address | Delivery Method | Alternate Delivery Method | View Trade Secret | Service List Name |
|----|------------|--------------|------------------------------|---|--|--|--------------------|---------------------------|-------------------|-------------------|
| 11 | Zachary | Golkowski | z Golkowski@mnpower.com | Minnesota Power | | 30 W. Superior Street Duluth MN, 55802 United States | Electronic Service | | No | 22-415Official |
| 12 | Abigail | Hencheck | ahencheck@mncenter.org | Minnesota Center for Environmental Advocacy | | 1919 University Ave W Suite 515 St. Paul MN, 55104 United States | Electronic Service | | No | 22-415Official |
| 13 | Valerie | Herring | vherring@taftlaw.com | Taft Stettinius & Hollister LLP | | 2200 IDS Center 80 S. Eighth Street Minneapolis MN, 55402 United States | Electronic Service | | No | 22-415Official |
| 14 | Brian | Hunker | bhunker@greenergy.com | Great River Energy | | 12300 Elm Creek Blvd Maple Grove MN, 55369 United States | Electronic Service | | No | 22-415Official |
| 15 | Craig | Janezich | craig.janezich@state.mn.us | | Public Utilities Commission | 121 7th Pl E #350 St. Paul MN, 55101 United States | Electronic Service | | No | 22-415Official |
| 16 | Raymond | Kirsch | raymond.kirsch@state.mn.us | | Department of Commerce | 85 7th Place E Ste 500 St. Paul MN, 55101 United States | Electronic Service | | No | 22-415Official |
| 17 | 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 | 22-415Official |
| 18 | Jennifer | Kuklenski | jkuklenski@mnpower.com | Minnesota Power | | 30 West Superior Street Duluth MN, 55082 United States | Electronic Service | | No | 22-415Official |
| 19 | Dan | Leshner | dlesher@greenergy.com | Great River Energy | | 12300 Elm Creek Blvd Maple Grove MN, 55369 United States | Electronic Service | | No | 22-415Official |
| 20 | Discovery | Manager | discoverymanager@mnpower.com | Minnesota Power | | 30 W Superior St Duluth MN, 55802 United States | Electronic Service | | No | 22-415Official |
| 21 | John | McElfresh | john@bvgassistedliving.com | | | 18323 County Road 22 Brainerd MN, 56401 United States | Electronic Service | | No | 22-415Official |

| # | First Name | Last Name | Email | Organization | Agency | Address | Delivery Method | Alternate Delivery Method | View Trade Secret | Service List Name |
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| 22 | Brian | Meloy | bmeloy@greenergy.com | Great River Energy | | 12300 Elm Creek Blvd Maple Grove MN, 55369 United States | Electronic Service | | No | 22-415Official |
| 23 | Kimberly | Middendorf | kimberly.middendorf@state.mn.us | | Office of Administrative Hearings | PO Box 64620 600 Robert St N Saint Paul MN, 55164-0620 United States | Electronic Service | | No | 22-415Official |
| 24 | David | Moeller | dmoeller@allete.com | Minnesota Power | | | Electronic Service | | No | 22-415Official |
| 25 | Carol A. | Overland | overland@legalectric.org | Legalelectric - Overland Law Office | | 1110 West Avenue Red Wing MN, 55066 United States | Electronic Service | | No | 22-415Official |
| 26 | Andre | Porter | misolegal@misoenergy.org | MISO | | 720 City Center Drive Carmel IN, 46032 United States | Electronic Service | | No | 22-415Official |
| 27 | Kevin | Pranis | kpranis@liunagro.com | Laborers' District Council of MN and ND | | 81 E Little Canada Road St. Paul MN, 55117 United States | Electronic Service | | No | 22-415Official |
| 28 | 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 | 22-415Official |
| 29 | Nathaniel | Runke | nrunke@local49.org | | | 611 28th St. NW Rochester MN, 55901 United States | Electronic Service | | No | 22-415Official |
| 30 | Will | Seuffert | will.seuffert@state.mn.us | | Public Utilities Commission | 121 7th Pl E Ste 350 Saint Paul MN, 55101 United States | Electronic Service | | Yes | 22-415Official |
| 31 | Janet | Shaddix Elling | jshaddix@janetshaddix.com | Shaddix And Associates | | 7400 Lyndale Ave S Ste 190 Richfield MN, 55423 United States | Electronic Service | | No | 22-415Official |
| 32 | Kodi | Verhalen | kverhalen@taftlaw.com | Taft Stettinius & Hollister LLP | | 80 S 8th St Ste 2200 Minneapolis MN, 55402 United States | Electronic Service | | No | 22-415Official |
| 33 | Haley | Waller Pitts | hwallerpitts@fredlaw.com | Fredrikson & Byron, P.A. | | 60 S Sixth St Ste 1500 Minneapolis | Electronic Service | | No | 22-415Official |

| # | First Name | Last Name | Email | Organization | Agency | Address | Delivery Method | Alternate Delivery Method | View Trade Secret | Service List Name |
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| | | | | | | MN, 55402-4400 United States | | | | |
| 34 | 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 | 22-415Official |

| # | First Name | Last Name | Email | Organization | Agency | Address | Delivery Method | Alternate Delivery Method | View Trade Secret | Service List Name |
|----|------------|-----------|------------------------------------|--|----------------------|---|--------------------|---------------------------|-------------------|-------------------|
| 1 | Lisa | Agrimonti | lagrimonti@fredlaw.com | Fredrikson & Byron, P.A. | | 60 South Sixth Street Suite 1500 Minneapolis MN, 55402-4400 United States | Electronic Service | | No | 22-416Official |
| 2 | Michael | Ahern | ahern.michael@dorsey.com | Dorsey & Whitney, LLP | | 50 S 6th St Ste 1500 Minneapolis MN, 55402-1498 United States | Electronic Service | | No | 22-416Official |
| 3 | 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 | 22-416Official |
| 4 | Jay | Anderson | jaya@cmpas.org | CMPAS | | 7550 Corporate Way Suite 100 Eden Prairie MN, 55344 United States | Electronic Service | | No | 22-416Official |
| 5 | 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 | 22-416Official |
| 6 | Kristine | Anderson | kanderson@greatermngas.com | Greater Minnesota Gas, Inc. | | 1900 Cardinal Lane PO Box 798 Faribault MN, 55021 United States | Electronic Service | | No | 22-416Official |
| 7 | Jaime | Arsenault | jaime.arsenault@whiteearth-nsn.gov | White Earth | | PO BOX 418 White Earth MN, 56591 United States | Electronic Service | | No | 22-416Official |
| 8 | Jim | Atkinson | jbatkinson@allete.com | Minnesota Power | | 30 West Superior Street Duluth MN, 55802 United States | Electronic Service | | No | 22-416Official |
| 9 | David | Bell | david.bell@state.mn.us | | Department of Health | POB 64975 St. Paul MN, 55164 United States | Electronic Service | | No | 22-416Official |
| 10 | Melanie | Benjamin | melanie.benjamin@millelacsband.com | | | 43408 Oodena Drive Onamia MN, 56359 United States | Electronic Service | | No | 22-416Official |
| 11 | James J. | Bertrand | james.bertrand@stinson.com | STINSON LLP | | 50 S 6th St Ste 2600 Minneapolis MN, 55402 United States | Electronic Service | | No | 22-416Official |
| 12 | Seth | Bichler | sethbichler@fdlrez.com | Fond du Lac Band of Lake Superior Chippewa | | 1720 Big Lake Rd Cloquet MN, 55720 United States | Electronic Service | | No | 22-416Official |
| 13 | David | Birkholz | david.birkholz@state.mn.us | MN Department of Commerce | | Suite 500 85 7th Place East St. Paul MN, | Electronic Service | | No | 22-416Official |

| # | First Name | Last Name | Email | Organization | Agency | Address | Delivery Method | Alternate Delivery Method | View Trade Secret | Service List Name |
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| | | | | | | 55101-2198 United States | | | | |
| 14 | Michelle F. | Bissonnette | michelle.bissonnette@hdrinc.com | HDR Engineering, Inc. | | Golden Hills Office Center 701 Xenia Ave S Ste 600 Minneapolis MN, 55416 United States | Electronic Service | | No | 22-416Official |
| 15 | Hunter | Boldt | hunterboldt@redlakenation.org | Red Lake Nation | | 15484 Migizi Drive Red Lake MN, 56671 United States | Electronic Service | | No | 22-416Official |
| 16 | Sheldon | Boyd | sheldon.boyd@millelacsband.com | Mille Lacs Band of Ojibwe | | 43408 Oodena Drive Onamia MN, 56359 United States | Electronic Service | | No | 22-416Official |
| 17 | Matthew | Brodin | mbrodin@allete.com | Minnesota Power | | 30 West Superior Street Duluth MN, 55802 United States | Electronic Service | | No | 22-416Official |
| 18 | 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 | 22-416Official |
| 19 | Christina | Brusven | cbrusven@fredlaw.com | Fredrikson Byron | | 60 S 6th St Ste 1500 Minneapolis MN, 55402-4400 United States | Electronic Service | | No | 22-416Official |
| 20 | 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 | 22-416Official |
| 21 | 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 | 22-416Official |
| 22 | Robert | Budreau | robert.budreau@llojibwe.net | Leech Lake Band of Ojibwe | | 190 Sailstar Drive NW Cass Lake MN, 56633 United States | Electronic Service | | No | 22-416Official |
| 23 | James | Canaday | james.canaday@ag.state.mn.us | | Office of the Attorney General - Residential Utilities Division | Suite 1400 445 Minnesota St. St. Paul MN, 55101 United States | Electronic Service | | No | 22-416Official |
| 24 | PUC | CAO | consumer,puc@state.mn.us | | Public Utilities Commission | Consumer Affairs Office 121 7th Place E Suite 350 St. Paul MN, 55101 United States | Electronic Service | | No | 22-416Official |
| 25 | Cathy | Chavers | cchavers@boisforte-nsn.gov | Bois Forte Band of Chippewa | | Bois Forte Tribal Government 5344 Lakeshore Drive Nett Lake MN, | Electronic Service | | No | 22-416Official |

| # | First Name | Last Name | Email | Organization | Agency | Address | Delivery Method | Alternate Delivery Method | View Trade Secret | Service List Name |
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| | | | | | | 55772 United States | | | | |
| 26 | 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 | 22-416Official |
| 27 | Cody | Chilson | cchilson@greatermngas.com | Greater Minnesota Gas, Inc. & Greater MN Transmission, LLC | | 1900 Cardinal Ln PO Box 798 Faribault MN, 55021 United States | Electronic Service | | No | 22-416Official |
| 28 | Ray | Choquette | rchoquette@agp.com | Ag Processing Inc. | | 12700 West Dodge Road PO Box 2047 Omaha NE, 68103-2047 United States | Electronic Service | | No | 22-416Official |
| 29 | John | Coffman | john@johncoffman.net | AARP | | 871 Tuxedo Blvd. St, Louis MO, 63119-2044 United States | Electronic Service | | No | 22-416Official |
| 30 | 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 | 22-416Official |
| 31 | Bill | Cook | bcook@rpu.org | Rochester Public Utilities | | 4000 East River Road NE Rochester MN, 55906 United States | Electronic Service | | No | 22-416Official |
| 32 | Water Programs | Coordinator | waterprograms.bwsr@state.mn.us | | Minnesota Board of Water and Soil Resources | 520 Lafayette Road N St. Paul MN, 55155 United States | Electronic Service | | No | 22-416Official |
| 33 | John | Crane | johncranefishing@gmail.com | Fishing | | 1250 Wee Gwaus DR SW Bemidji MN, 56601 United States | Electronic Service | | No | 22-416Official |
| 34 | Brandon | Crawford | brandonc@cubminnesota.org | Citizens Utility Board of Minnesota | | 332 Minnesota St Ste W1360 St. Paul MN, 55101 United States | Electronic Service | | No | 22-416Official |
| 35 | Hillary | Creurer | hcreurer@allete.com | Minnesota Power | | 30 W Superior St Duluth MN, 55802 United States | Electronic Service | | No | 22-416Official |
| 36 | George | Crocker | gwillc@nawo.org | North American Water Office | | 5093 Keats Avenue Lake Elmo MN, 55042 United States | Electronic Service | | No | 22-416Official |
| 37 | 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 | 22-416Official |

| # | First Name | Last Name | Email | Organization | Agency | Address | Delivery Method | Alternate Delivery Method | View Trade Secret | Service List Name |
|----|------------|----------------|----------------------------------|---|---------------------------------|---|--------------------|---------------------------|-------------------|-------------------|
| 38 | 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 | 22-416Official |
| 39 | Thomas | Davis | atdavis1972@outlook.com | - | | 1161 50th Ave Sherburn MN, 56171 United States | Electronic Service | | No | 22-416Official |
| 40 | Jason | Decker | jason.decker@llojibwe.net | Leech Lake Band of Ojibwe | | 190 Sailstar Drive NW Cass Lake MN, 56633 United States | Electronic Service | | No | 22-416Official |
| 41 | Bobby | Deschampe | robertdeschampe@grandportage.com | Grand Portage Band of Lake Superior Chippewa | | PO Box 428 Grand Portage MN, 55605 United States | Electronic Service | | No | 22-416Official |
| 42 | Randall | Doneen | randall.doneen@state.mn.us | | Department of Natural Resources | 500 Lafayette Rd, PO Box 25 Saint Paul MN, 55155 United States | Electronic Service | | No | 22-416Official |
| 43 | John | Drawz | jdrawz@fredlaw.com | Fredrikson & Byron, P.A. | | Suite 1500 60 South Sixth Street Minneapolis MN, 55402-4400 United States | Electronic Service | | No | 22-416Official |
| 44 | 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 | 22-416Official |
| 45 | Adam | Duininck | aduininck@ncsrcc.org | North Central States Regional Council of Carpenters | | 700 Olive Street St. Paul MN, 55130 United States | Electronic Service | | No | 22-416Official |
| 46 | 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 | 22-416Official |
| 47 | Kevin | Dupuis, Sr. | kevindupuis@fdlrez.com | | | Reservation Business Committee 1720 Big Lake Rd Cloquet MN, 55720 United States | Electronic Service | | No | 22-416Official |
| 48 | Cory | Dutcher | cory.dutcher@ge.com | GE Power and Water | | 1 River Rd. Bldg. 37-413 Schenectady NY, 12345 United States | Electronic Service | | No | 22-416Official |
| 49 | Jamie | Edwards | jamie.edwards@millelacsband.com | Mille Lacs Band of Ojibwe | | 43408 Oodena Drive Onamia MN, 56358 United States | Electronic Service | | No | 22-416Official |
| 50 | Kristen | Eide Tollefson | healingsystems69@gmail.com | R-CURE | | 28477 N Lake Ave Frontenac MN, 55026-1044 United States | Electronic Service | | No | 22-416Official |
| 51 | Matthew | Ellis | mellis@grenergy.com | Great River Energy | | null null, null | Electronic Service | | No | 22-416Official |

| # | First Name | Last Name | Email | Organization | Agency | Address | Delivery Method | Alternate Delivery Method | View Trade Secret | Service List Name |
|----|------------|-------------|--------------------------------------|--|---------------------------------|--|--------------------|---------------------------|-------------------|-------------------|
| | | | | | | United States | | | | |
| 52 | Kyle | Fairbanks | kyle.fairbanks@llojibwe.net | Leech Lake Band of Ojibwe | | 190 Sailstar Drive NW Cass Lake MN, 56633 United States | Electronic Service | | No | 22-416Official |
| 53 | Michael | Fairbanks | michael.fairbanks@whiteearth-nsn.gov | White Earth Reservation Business Committee | | PO Box 418 White Earth MN, 56591 United States | Electronic Service | | No | 22-416Official |
| 54 | 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 | 22-416Official |
| 55 | 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 | 22-416Official |
| 56 | Eric | Fehlhaber | efehlhaber@dakotaelectric.com | Dakota Electric Association | | 4300 220th St W Farmington MN, 55024 United States | Electronic Service | | No | 22-416Official |
| 57 | Annie | Felix Gerth | annie.felix-gerth@state.mn.us | | | Board of Water & Soil Resources 520 Lafayette Rd Saint Paul MN, 55155 United States | Electronic Service | | No | 22-416Official |
| 58 | 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 | 22-416Official |
| 59 | Kade | Ferris | kade.ferris@redlakenation.org | Red Lake Region | | PO Box 274 Red Lake MN, 56671 United States | Electronic Service | | No | 22-416Official |
| 60 | Leonard | Fineday | leonard.fineday@llojibwe.net | Leech Lake Band of Ojibwe | | 190 Sailstar Drive NW Cass Lake MN, 56633 United States | Electronic Service | | No | 22-416Official |
| 61 | Terri | Finn | terri.goggeye@llojibwe.net | | | null null, null United States | Electronic Service | | No | 22-416Official |
| 62 | Henry | Fox | henry.fox@whiteearth-nsn.gov | White Earth Nation | | PO Box 418 White Earth MN, 56569 United States | Electronic Service | | No | 22-416Official |
| 63 | Gary | Frazer | gfrazier@mnchippewatribe.org | Minnesota Chippewa Tribe | | PO Box 217 Cass Lake MN, 56633 United States | Electronic Service | | No | 22-416Official |
| 64 | Docketing | Fredlaw | docketing@fredlaw.com | Fredrickson & Byron | | 200 S 6th St, Suite 4000 Minneapolis MN, 55402 United States | Electronic Service | | No | 22-416Official |
| 65 | Daryll | Fuentes | energy@usg.com | USG Corporation | | 550 W Adams St Chicago IL, 60661 United States | Electronic Service | | No | 22-416Official |
| 66 | Mary Ann | Gagnon | maryanng@grandportage.com | Grand Portage Band of Ojibwe | | PO Box 428 Grand Portage MN, | Electronic Service | | No | 22-416Official |

| # | First Name | Last Name | Email | Organization | Agency | Address | Delivery Method | Alternate Delivery Method | View Trade Secret | Service List Name |
|----|------------|-----------|---------------------------------------|---|--|---|--------------------|---------------------------|-------------------|-------------------|
| | | | | | | 55605 United States | | | | |
| 67 | Karen A | Gebhardt | kageb1@gvtel.com | | | 43901 253rd Ave Leonard MN, 56652-4026 United States | Electronic Service | | No | 22-416Official |
| 68 | Shannon | Geshick | shannon.geshick@state.mn.us | Minnesota Indian Affairs Council (MIAC) | | null null, null United States | Electronic Service | | No | 22-416Official |
| 69 | Tara | Geshick | | Bois Forte Band of Chippewa Tribal Government | | 5344 Lakeshore Drive Nett Lake MN, 55772 United States | Paper Service | | No | 22-416Official |
| 70 | Todd | Green | todd.a.green@state.mn.us | | Minnesota Department of Labor & Industry | 443 Lafayette Rd N St. Paul MN, 55155-4341 United States | Electronic Service | | No | 22-416Official |
| 71 | Todd J. | Guerrero | todd.guerrero@kutakrock.com | Kutak Rock LLP | | Suite 1750 220 South Sixth Street Minneapolis MN, 55402-1425 United States | Electronic Service | | No | 22-416Official |
| 72 | Jeremy | Hamilton | jhamilton@uppersiouxcommunity-nsn.gov | Upper Sioux Community | | Upper Sioux Community PO Box 147 Granite Falls MN, 56241 United States | Electronic Service | | No | 22-416Official |
| 73 | Ashley | Harrison | ashley.harrison@llojibwe.net | Leech Lake Band of Ojibwe | | 190 Sailstar Dr NW Cass Lake MN, 56633 United States | Electronic Service | | No | 22-416Official |
| 74 | Larry | Hartman | larry.hartman@state.mn.us | | Department of Commerce | 85 7th Place East, Suite 280 St. Paul MN, 55101 United States | Electronic Service | | No | 22-416Official |
| 75 | Amy | Hastings | amyh@uppersiouxcommunity-nsn.gov | Upper Sioux Community | | 5722 Travers Lane PO Box 147 Granite Falls MN, 56241 United States | Electronic Service | | No | 22-416Official |
| 76 | Adam | Heinen | aheinen@dakotaelectric.com | Dakota Electric Association | | 4300 220th St W Farmington MN, 55024 United States | Electronic Service | | No | 22-416Official |
| 77 | Annete | Henkel | mui@mnuutilityinvestors.org | Minnesota Utility Investors | | 413 Wacouta Street #230 St.Paul MN, 55101 United States | Electronic Service | | No | 22-416Official |
| 78 | Valerie | Herring | vherring@taftlaw.com | Taft Stettinius & Hollister LLP | | 2200 IDS Center 80 S. Eighth Street Minneapolis MN, 55402 United States | Electronic Service | | No | 22-416Official |
| 79 | Corey | Hintz | chintz@dakotaelectric.com | Dakota Electric Association | | 4300 220th Street Farmington MN, 55024-9583 United States | Electronic Service | | No | 22-416Official |

| # | First Name | Last Name | Email | Organization | Agency | Address | Delivery Method | Alternate Delivery Method | View Trade Secret | Service List Name |
|----|------------|------------------|------------------------------------|----------------------------------|-----------------------------|--|--------------------|---------------------------|-------------------|-------------------|
| 80 | Michael | Hoppe | lu23@ibew23.org | Local Union 23, I.B.E.W. | | 445 Etna Street Ste. 61 St. Paul MN, 55106 United States | Electronic Service | | No | 22-416Official |
| 81 | 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 | 22-416Official |
| 82 | Lori | Hoyum | lhoyum@mnpower.com | Minnesota Power | | 30 West Superior Street Duluth MN, 55802 United States | Electronic Service | | No | 22-416Official |
| 83 | Annie | Jackson | cheryl.jackson@whiteearth-nsn.gov | White Earth Nation | | White Earth Tribal Headquarters 35500 Eagle View Road Ogemomn, 56569 United States | Electronic Service | | No | 22-416Official |
| 84 | Faron | Jackson, Sr. | faron.jackson@llojbwe.net | | | 190 Sailstar Drive NW Cass Lake MN, 56633 United States | Electronic Service | | No | 22-416Official |
| 85 | Travis | Jacobson | travis.jacobson@mdu.com | Great Plains Natural Gas Company | | 400 N 4th St Bismarck ND, 58501 United States | Electronic Service | | No | 22-416Official |
| 86 | Craig | Janezich | craig.janezich@state.mn.us | | Public Utilities Commission | 121 7th PI E #350 St. Paul MN, 55101 United States | Electronic Service | | No | 22-416Official |
| 87 | Alan | Jenkins | aj@jenkinsatlaw.com | Jenkins at Law | | 2950 Yellowtail Ave. Marathon FL, 33050 United States | Electronic Service | | No | 22-416Official |
| 88 | Kevin | Jensvold | kevinj@uppersiouxcommunity-nsn.gov | Upper Sioux Community | | PO Box 147 Granite Falls MN, 56241-0147 United States | Electronic Service | | No | 22-416Official |
| 89 | Jody | Johnson | jody.johnson@piic.org | Prairie Island Indian Community | | 5636 Sturgeon Lake Rd Welch MN, 55089 United States | Electronic Service | | No | 22-416Official |
| 90 | Johnny | Johnson | johnny.johnson@piic.org | Prairie Island Indian Community | | 5636 Sturgeon Lake Road Welch MN, 55089 United States | Electronic Service | | No | 22-416Official |
| 91 | Richard | Johnson | rick.johnson@lawmoss.com | Moss & Barnett | | 150 S. 5th Street Suite 1200 Minneapolis MN, 55402 United States | Electronic Service | | No | 22-416Official |
| 92 | Scott | Johnson | scott.johnson@ci.medina.mn.us | City of Medina | | 2052 County Road 24 Medina MN, 55340-9790 United States | Electronic Service | | No | 22-416Official |
| 93 | Sarah | Johnson Phillips | sjphillips@stoel.com | Stoel Rives LLP | | 33 South Sixth Street | Electronic Service | | No | 22-416Official |

| # | First Name | Last Name | Email | Organization | Agency | Address | Delivery Method | Alternate Delivery Method | View Trade Secret | Service List Name |
|-----|------------|-----------------|---------------------------------|---|--|---|-----------------------|---------------------------|-------------------|--------------------|
| | | | | | | Suite 4200 Minneapolis MN, 55402 United States | | | | |
| 94 | Michael | Kaluzniak | mike.kaluzniak@state.mn.us | | Public Utilities Commission | Suite 350 121 Seventh Place East St. Paul MN, 55101 United States | Electronic Service | | No | 22- 416Official |
| 95 | Nick | Kaneski | nick.kaneski@enbridge.com | Enbridge Energy Company, Inc. | | 11 East Superior St Ste 125 Duluth MN, 55802 United States | Electronic Service | | No | 22- 416Official |
| 96 | Tom | Karas | tomskaras@gmail.com | | | 3171 309th Ave NW Cambridge MN, 55008 United States | Electronic Service | | No | 22- 416Official |
| 97 | Bruce | King | brenda@ranww.org | Realtors, Association of Northwestern WI | | Suite 3 1903 Keith Street Eau Claire WI, 54701 United States | Electronic Service | | No | 22- 416Official |
| 98 | Raymond | Kirsch | raymond.kirsch@state.mn.us | | Department of Commerce | 85 7th Place E Ste 500 St. Paul MN, 55101 United States | Electronic Service | | No | 22- 416Official |
| 99 | 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 | 22- 416Official |
| 100 | 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 | 22- 416Official |
| 101 | Michael | Krikava | mkrikava@taftlaw.com | Taft Stettinius & Hollister LLP | | 2200 IDS Center 80 S 8th St Minneapolis MN, 55402 United States | Electronic Service | | No | 22- 416Official |
| 102 | Nicolle | Kupser | nkupser@greatermngas.com | Greater Minnesota Gas, Inc. | | 1900 Cardinal Ln PO Box 798 Faribault MN, 55021 United States | Electronic Service | | No | 22- 416Official |
| 103 | Mike | Laroque | mike.laroque@whiteearth-nsn.gov | White Earth Nation | | PO Box 418 White Earth MN, 56591 United States | Electronic Service | | No | 22- 416Official |
| 104 | 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 | 22- 416Official |
| 105 | James D. | Larson | james.larson@avantenergy.com | Avant Energy Services | | 220 S 6th St Ste 1300 Minneapolis MN, 55402 United States | Electronic Service | | No | 22- 416Official |
| 106 | Peder | Larson | plarson@larkinhoffman.com | Larkin Hoffman Daly & Lindgren, Ltd. | | 8300 Norman Center Drive Suite 1000 Bloomington MN, 55437 United States | Electronic Service | | No | 22- 416Official |

| # | First Name | Last Name | Email | Organization | Agency | Address | Delivery Method | Alternate Delivery Method | View Trade Secret | Service List Name |
|-----|------------|------------|------------------------------------|--|---|---|--------------------|---------------------------|-------------------|-------------------|
| 107 | Dan | Leshner | dlesher@greenergy.com | Great River Energy | | 12300 Elm Creek Blvd Maple Grove MN, 55369 United States | Electronic Service | | No | 22-416Official |
| 108 | Eric | Lipman | eric.lipman@state.mn.us | | Office of Administrative Hearings | PO Box 64620 St. Paul MN, 55164-0620 United States | Electronic Service | | No | 22-416Official |
| 109 | Jason | Loos | jason.loos@centerpointenergy.com | CenterPoint Energy Resources Corp. | | 505 Nicollet Mall 3rd Floor Minneapolis MN, 55402 United States | Electronic Service | | No | 22-416Official |
| 110 | Susan | Ludwig | sludwig@mnpower.com | Minnesota Power | | 30 West Superior Street Duluth MN, 55802 United States | Electronic Service | | No | 22-416Official |
| 111 | Vernelle | Lussier | vernelle.lussier@redlakenation.org | Red Lake Nation | | 15484 Migizi Drive Red Lake MN, 56671 United States | Electronic Service | | No | 22-416Official |
| 112 | Kavita | Maini | kmains@wi.rr.com | KM Energy Consulting, LLC | | 961 N Lost Woods Rd Oconomowoc WI, 53066 United States | Electronic Service | | No | 22-416Official |
| 113 | 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 | 22-416Official |
| 114 | Shena | Matrious | shena.matrious@millelacsband.com | Mille Lacs Band of Ojibwe | | 43408 Oodena Drive Onamia MN, 56349 United States | Electronic Service | | No | 22-416Official |
| 115 | April | McCormick | aprilm@grandportage.com | Grand Portage Band of Lake Superior Chippewa | | PO Box 428 Grand Portage MN, 55605 United States | Electronic Service | | No | 22-416Official |
| 116 | Brian | Meloy | bmeloy@greenergy.com | Great River Energy | | 12300 Elm Creek Blvd Maple Grove MN, 55369 United States | Electronic Service | | No | 22-416Official |
| 117 | Joseph | Meyer | joseph.meyer@ag.state.mn.us | | Office of the Attorney General - Residential Utilities Division | Bremer Tower, Suite 1400 445 Minnesota Street St Paul MN, 55101-2131 United States | Electronic Service | | No | 22-416Official |
| 118 | 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 | 22-416Official |
| 119 | Kimberly | Middendorf | kimberly.middendorf@state.mn.us | | Office of Administrative Hearings | PO Box 64620 600 Robert St N | Electronic Service | | Yes | 22-416Official |

| # | First Name | Last Name | Email | Organization | Agency | Address | Delivery Method | Alternate Delivery Method | View Trade Secret | Service List Name |
|-----|------------|------------|---------------------------------------|---|--------|---|-----------------------|---------------------------|-------------------|--------------------|
| | | | | | | Saint Paul MN, 55164-0620 United States | | | | |
| 120 | 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 | 22- 416Official |
| 121 | Stacy | Miller | stacy.miller@minneapolismn.gov | City of Minneapolis | | 350 S. 5th Street Room M 301 Minneapolis MN, 55415 United States | Electronic Service | | No | 22- 416Official |
| 122 | David | Moeller | dmoeller@allete.com | Minnesota Power | | | Electronic Service | | No | 22- 416Official |
| 123 | Andrew | Moratzka | andrew.moratzka@stoel.com | Stoel Rives LLP | | 33 South Sixth St Ste 4200 Minneapolis MN, 55402 United States | Electronic Service | | No | 22- 416Official |
| 124 | Travis | Morrison | travis.morrison@boisforte-nsn.gov | Bois Forte Band of Chippewa | | Bois Forte Tribal Government 5344 Lakeshore Drive Nett Lake MN, 55772 United States | Electronic Service | | No | 22- 416Official |
| 125 | Robert | Moyer, Jr. | rmoyer@boisforte-nsn.gov | Bois Forte Band of Chippewa Tribal Government | | 5344 Lakeshore Drive Nett Lake MN, 55772 United States | Electronic Service | | No | 22- 416Official |
| 126 | Colleen | Mueller | | | | 22186 State Hwy 4 Paynesville MN, 56362 United States | Paper Service | | No | 22- 416Official |
| 127 | Sonny | Myers | smyers@1854treatyauthority.org | 1854 Treaty Authority | | 4428 Haines Rd Duluth MN, 55811-1524 United States | Electronic Service | | No | 22- 416Official |
| 128 | Dan | Nelson | dan.nelson@isginc.com | I&S Group | | 115 E Hickory St Ste 300 Mankato MN, 56001 United States | Electronic Service | | No | 22- 416Official |
| 129 | David | Niles | david.niles@avantenergy.com | Minnesota Municipal Power Agency | | 220 South Sixth Street Suite 1300 Minneapolis MN, 55402 United States | Electronic Service | | No | 22- 416Official |
| 130 | Samantha | Norris | samanthanorris@alliantenergy.com | Interstate Power and Light Company | | 200 1st Street SE PO Box 351 Cedar Rapids IA, 52406-0351 United States | Electronic Service | | No | 22- 416Official |
| 131 | Joseph | OBrien | joey.obrien@lowersioux.com | | | 39527 Highway 1 Morton MN, 56270 United States | Electronic Service | | No | 22- 416Official |
| 132 | Samantha | Odegard | samanthao@upperSiouxcommunity-nsn.gov | | | PO Box 147 Granite Falls | Electronic Service | | No | 22- 416Official |

| # | First Name | Last Name | Email | Organization | Agency | Address | Delivery Method | Alternate Delivery Method | View Trade Secret | Service List Name |
|-----|----------------|--------------------------------|---------------------------------------|---|---|--|--------------------|---------------------------|-------------------|-------------------|
| | | | | | | MN, 56241 United States | | | | |
| 133 | Matthew | Olsen | molsen@otpc.com | Otter Tail Power Company | | 215 South Cascade Street Fergus Falls MN, 56537 United States | Electronic Service | | No | 22-416Official |
| 134 | Carol A. | Overland | overland@legalectric.org | Legalelectric - Overland Law Office | | 1110 West Avenue Red Wing MN, 55066 United States | Electronic Service | | No | 22-416Official |
| 135 | Greg | Palmer | gpalmer@greatermngas.com | Greater Minnesota Gas, Inc. | | 1900 Cardinal Ln PO Box 798 Faribault MN, 55021 United States | Electronic Service | | No | 22-416Official |
| 136 | Earl | Pendleton | earl.pendleton@lowersioux.com | Lower Sioux Indian Community | | 39527 Highway 1 Morton MN, 56270 United States | Electronic Service | | No | 22-416Official |
| 137 | Jennifer | Peterson | jjpeterson@mnpower.com | Minnesota Power | | 30 West Superior Street Duluth MN, 55802 United States | Electronic Service | | No | 22-416Official |
| 138 | Kevin | Peterson | kjp@ibew160.org | | | 1109 Northway Lane NE Rochester MN, 55906 United States | Electronic Service | | No | 22-416Official |
| 139 | Catherine | Phillips | catherine.phillips@wecenergygroup.com | Minnesota Energy Resources | | 231 West Michigan St Milwaukee WI, 53203 United States | Electronic Service | | No | 22-416Official |
| 140 | Angela | Piner | angela.piner@hdrinc.com | HDR, Inc. | | Suite 600 701 Xenia Avenue South Suite 600 Minneapolis MN, 55416 United States | Electronic Service | | No | 22-416Official |
| 141 | Joe | Plumer | joe.plumer@redlakenation.org | Red Lake Nation | | 15484 Migizi Drive Red Lake MN, 56671 United States | Electronic Service | | No | 22-416Official |
| 142 | Andre | Porter | misolegal@misoenergy.org | MISO | | 720 City Center Drive Carmel IN, 46032 United States | Electronic Service | | No | 22-416Official |
| 143 | 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 | 22-416Official |
| 144 | Robert | Prescott | bob.prescott@lowersioux.com | Lower Sioux Indian Community | | 39527 Highway 1 Morton MN, 56270 United States | Electronic Service | | No | 22-416Official |
| 145 | Larry | Rebman | larryemls@hotmail.com | EMLS, Inc | | PO Box 122 Appleton MN, 56208 United States | Electronic Service | | No | 22-416Official |
| 146 | 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, | Electronic Service | | Yes | 22-416Official |

| # | First Name | Last Name | Email | Organization | Agency | Address | Delivery Method | Alternate Delivery Method | View Trade Secret | Service List Name |
|-----|------------|------------|-----------------------------------|--------------------------------------|-------------------------------------|--|--------------------|---------------------------|-------------------|-------------------|
| | | | | | | 55101-2131 United States | | | | |
| 147 | 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 | 22-416Official |
| 148 | Margaret | Rheude | margaret_rheude@fws.gov | U.S. Fish and Wildlife Service | | Twin Cities Ecological Services Field Office 4101 American Blvd. E. Bloomington MN, 55425 United States | Electronic Service | | No | 22-416Official |
| 149 | Susan | Romans | sromans@allete.com | Minnesota Power | | 30 West Superior Street Legal Dept Duulth MN, 55802 United States | Electronic Service | | No | 22-416Official |
| 150 | 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 | 22-416Official |
| 151 | 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 | 22-416Official |
| 152 | Nathaniel | Runke | nrunke@local49.org | | | 611 28th St. NW Rochester MN, 55901 United States | Electronic Service | | No | 22-416Official |
| 153 | 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 | 22-416Official |
| 154 | Adam | Savariego | adams@uppersiouxcommunity-nsn.gov | Upper Sioux Community | | 5722 Travers Lane PO Box 147 Granite Falls MN, 56241 United States | Electronic Service | | No | 22-416Official |
| 155 | Elizabeth | Schmiesing | eschmiesing@winthrop.com | Winthrop & Weinstine, P.A. | | 225 South Sixth Street Suite 3500 Minneapolis MN, 55402 United States | Electronic Service | | No | 22-416Official |
| 156 | Christine | Schwartz | regulatory.records@xcelenergy.com | Xcel Energy | | 414 Nicollet Mall FL 7 Minneapolis MN, 55401-1993 United States | Electronic Service | | No | 22-416Official |
| 157 | Jessie | Seim | jessie.seim@piic.org | Prairie Island Indian Community | | 5636 Sturgeon Lake Rd Welch MN, 55089 United States | Electronic Service | | No | 22-416Official |
| 158 | Darrell | Seki, Sr. | dseki@redlakenation.org | | | 15484 Migizi Drive | Electronic Service | | No | 22-416Official |

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|-----|------------|-----------------------|-----------------------------------|---------------------------------|-----------------------------|---|--------------------|---------------------------|-------------------|-------------------|
| | | | | | | Red Lake MN, 56671 United States | | | | |
| 159 | Will | Seuffert | will.seuffert@state.mn.us | | Public Utilities Commission | 121 7th PI E Ste 350 Saint Paul MN, 55101 United States | Electronic Service | | Yes | 22-416Official |
| 160 | Janet | Shaddix Elling | jshaddix@janetshaddix.com | Shaddix And Associates | | 7400 Lyndale Ave S Ste 190 Richfield MN, 55423 United States | Electronic Service | | Yes | 22-416Official |
| 161 | Tom | Slukich | tom@nationalconductor.com | National Conductor Constructors | | 18119 Hwy 371 North Braiderd MN, 56401 United States | Electronic Service | | No | 22-416Official |
| 162 | Joel | Smith | jsmith@mnchippewatribe.org | Minnesota Chippewa Tribe | | PO Box 217 Cass Lake MN, 56633 United States | Electronic Service | | No | 22-416Official |
| 163 | Ken | Smith | ken.smith@districtenergy.com | District Energy St. Paul Inc. | | 76 W Kellogg Blvd St. Paul MN, 55102 United States | Electronic Service | | No | 22-416Official |
| 164 | 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 | 22-416Official |
| 165 | Roger | Smith, Sr. | rogermsmithsr@fdlrez.com | | | 1720 Big Lake Road Cloquet MN, 55720 United States | Electronic Service | | No | 22-416Official |
| 166 | Adam | Sokolski | adam.sokolski@edf-re.com | EDF Renewable Energy | | 10 Second Street NE Ste 400 Minneapolis MN, 55410 United States | Electronic Service | | No | 22-416Official |
| 167 | Eugene | Sommers | eugene.sommers@whiteearth-nsn.gov | White Earth Nation | | PO BOX 418 White Earth MN, 56591 United States | Electronic Service | | No | 22-416Official |
| 168 | Peggy | Sorum | peggy.sorum@centerpointenergy.com | CenterPoint Energy | | 505 Nicollet Mall Minneapolis MN, 55402 United States | Electronic Service | | No | 22-416Official |
| 169 | Marie | Spry | mariespry@grandportage.com | | | PO Box 428 Grand Portage MN, 55605 United States | Electronic Service | | No | 22-416Official |
| 170 | Cheyenne | St. John | cheyanne.stjohn@lowersioux.com | Lower Sioux Tribal Community | | 39527 Reservation Hwy 1 Morton MN, 56270 United States | Electronic Service | | No | 22-416Official |
| 171 | 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 | 22-416Official |
| 172 | Byron E. | Starns | byron.starns@stinson.com | STINSON LLP | | 50 S 6th St Ste 2600 Minneapolis MN, 55402 United States | Electronic Service | | No | 22-416Official |

| # | First Name | Last Name | Email | Organization | Agency | Address | Delivery Method | Alternate Delivery Method | View Trade Secret | Service List Name |
|-----|------------|------------|-----------------------------------|--|--------|---|--------------------|---------------------------|-------------------|-------------------|
| 173 | Kristin | Stastny | kstastny@taftlaw.com | Taft Stettinius & Hollister LLP | | 2200 IDS Center 80 South 8th Street Minneapolis MN, 55402 United States | Electronic Service | | No | 22-416Official |
| 174 | Toby | Stephens | tobys@grandportage.com | Grand Portage Band of Lake Superior Chippewa | | PO BOX 428 Grand Portage MN, 55605 United States | Electronic Service | | No | 22-416Official |
| 175 | Cary | Stephenson | cstephenson@otpc.com | Otter Tail Power Company | | 215 South Cascade Street Fergus Falls MN, 56537 United States | Electronic Service | | No | 22-416Official |
| 176 | Mark | Strohfus | mstrohfus@grenergy.com | Great River Energy | | 12300 Elm Creek Boulevard Maple Grove MN, 55369-4718 United States | Electronic Service | | No | 22-416Official |
| 177 | Carl | Stroh | cjsmg@sbcglobal.net | SBC Global | | 105 East Edgewood Ave Indianapolis IN, 46227 United States | Electronic Service | | No | 22-416Official |
| 178 | James M | Strommen | jstrommen@kennedy-graven.com | Kennedy & Graven, Chartered | | 150 S 5th St Ste 700 Minneapolis MN, 55402 United States | Electronic Service | | No | 22-416Official |
| 179 | Samuel | Strong | sam.strong@redlakenation.org | Red Lake Nation | | 15484 Migizi Drive Red Lake MN, 56671 United States | Electronic Service | | No | 22-416Official |
| 180 | Tom | Swafford | tswafford@umsi.us | Utility Mapping Services, Inc | | 3947 E Calvary Rd Suite 103 Duluth MN, 55803 United States | Electronic Service | | No | 22-416Official |
| 181 | Eric | Swanson | eswanson@winthrop.com | Winthrop & Weinstine | | 225 S 6th St Ste 3500 Capella Tower Minneapolis MN, 55402-4629 United States | Electronic Service | | No | 22-416Official |
| 182 | Todd | Tadych | ttadych@atcllc.com | American Transmission Company LLC | | 5303 Fen Oak Dr Madison WI, 53718 United States | Electronic Service | | No | 22-416Official |
| 183 | Camille | Tanhoff | kamip@uppersiouxcommunity-nsn.gov | Upper Sioux Community | | 5722 Travers Lane PO BOX 147 Granite Falls MN, 56241 United States | Electronic Service | | No | 22-416Official |
| 184 | Stuart | Tommerdahl | stommerdahl@otpc.com | Otter Tail Power Company | | 215 S Cascade St PO Box 496 Fergus Falls MN, 56537 United States | Electronic Service | | No | 22-416Official |
| 185 | Jayne | Trusty | execdir@swrdc.org | SWRDC | | 2401 Broadway Ave #1 Slayton MN, 56172 United States | Electronic Service | | No | 22-416Official |

| # | First Name | Last Name | Email | Organization | Agency | Address | Delivery Method | Alternate Delivery Method | View Trade Secret | Service List Name |
|-----|------------|--------------|------------------------------------|---|---------------------------------|---|--------------------|---------------------------|-------------------|-------------------|
| 186 | 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 | 22-416Official |
| 187 | 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 | 22-416Official |
| 188 | Kodi | Verhalen | kverhalen@taftlaw.com | Taft Stettinius & Hollister LLP | | 80 S 8th St Ste 2200 Minneapolis MN, 55402 United States | Electronic Service | | No | 22-416Official |
| 189 | Leonard | Wabasha | leonard.wabasha@shakopeedakota.org | Shakopee Mdewakanton Sioux Community | | 2300 Tiwahe Circle Shakopee MN, 55379 United States | Electronic Service | | No | 22-416Official |
| 190 | Haley | Waller Pitts | hwallerpitts@fredlaw.com | Fredrikson & Byron, P.A. | | 60 S Sixth St Ste 1500 Minneapolis MN, 55402-4400 United States | Electronic Service | | No | 22-416Official |
| 191 | Caren | Warner | caren.warner@state.mn.us | | Department of Commerce | 85 7th Place East Suite 280 St. Paul MN, 55101-2198 United States | Electronic Service | | No | 22-416Official |
| 192 | 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 | 22-416Official |
| 193 | Elizabeth | Wefel | eawefel@flaherty-hood.com | Missouri River Energy Services | | 525 Park St Ste 470 Saint Paul MN, 55103 United States | Electronic Service | | No | 22-416Official |
| 194 | Heather | Westra | heather.westra@piic.org | Prairie Island Indian Community | | 5636 Sturgeon Lake Rd Welch MN, 55089 United States | Electronic Service | | No | 22-416Official |
| 195 | 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 | 22-416Official |
| 196 | Deanna | White | mncwa@cleanwater.org | Clean Water Action & Water Fund of MN | | 330 S 2nd Ave Ste 420 Minneapolis MN, 55401 United States | Electronic Service | | No | 22-416Official |
| 197 | Noah | White | noah.white@piic.org | Prairie Island Indian Community | | 5636 Sturgeon Lake Road Welch MN, 55089 United States | Electronic Service | | No | 22-416Official |
| 198 | Steve | White | steve.white@llojibwe.net | Leech Lake Band of Ojibwe | | 190 Sailstar Drive NW Cass Lake MN, 56633 United States | Electronic Service | | No | 22-416Official |

| # | First Name | Last Name | Email | Organization | Agency | Address | Delivery Method | Alternate Delivery Method | View Trade Secret | Service List Name |
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| 199 | Cody | Whitebear | cody.whitebear@pic.org | Prairie Island Indian Community | | 5636 Sturgeon Lake Road Welch MN, 55089 United States | Electronic Service | | No | 22-416Official |
| 200 | Mike | Wilson | mike.wilson@millelacsband.com | Mille Lacs Band of Ojibwe | | 43408 Oodena Dr Onamia MN, 56359 United States | Electronic Service | | No | 22-416Official |
| 201 | Virgil | Wind | virgil.wind@millelacsband.com | Mille Lacs Band of Ojibwe | | 43408 Oodena Drive Onamia MN, 56359 United States | Electronic Service | | No | 22-416Official |
| 202 | Joseph | Windler | jwindler@winthrop.com | Winthrop & Weinstine | | 225 South Sixth Street, Suite 3500 Minneapolis MN, 55402 United States | Electronic Service | | No | 22-416Official |
| 203 | Jonathan | Wolfgram | jonathan.wolfgram@state.mn.us | | Office of Pipeline Safety | 445 Minnesota St Ste 147 Woodbury MN, 55125 United States | Electronic Service | | No | 22-416Official |
| 204 | Laurie | York | laurie.york@whiteearth-nsn.gov | White Earth Reservation Business Committee | | PO Box 418 White Earth MN, 56591 United States | Electronic Service | | No | 22-416Official |
| 205 | Kurt | Zimmerman | kwz@ibew160.org | Local Union #160, IBEW | | 2909 Anthony Ln St Anthony Village MN, 55418-3238 United States | Electronic Service | | No | 22-416Official |
| 206 | Patrick | Zomer | pat.zomer@lawmoss.com | Moss & Barnett PA | | 150 S 5th St #1200 Minneapolis MN, 55402 United States | Electronic Service | | No | 22-416Official |