



414 Nicollet Mall
Minneapolis, MN 55401

February 20, 2026

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

—Via Electronic Filing—

RE: PETITION
PROPOSED GENERATOR PROJECTS FOR MISO ERAS – SELF-BUILD
DOCKET NO. E002/RP-24-67

Dear Ms. Bergman:

Northern States Power Company, doing business as Xcel Energy, submits to the Minnesota Public Utilities Commission the enclosed Petition for approval of two Commission-verified self-build projects for which the Company submitted an Expedited Resource Addition Study (ERAS) application to the Midcontinent Independent System Operator (MISO) in support of the Company's resource needs:

- 300 MW Nobles Battery Energy Storage System (BESS), and
- 300 MW Sherco South BESS.

These proposed ERAS projects are expected to deliver benefits to our customers by providing the capacity and energy we need to serve them safely, reliably, and affordably.

Specifically, we request that the Commission take the following actions:

- Find that the Company's proposed ERAS 2 project portfolio is in the public interest;
- Approve the acquisition and construction of the Company's proposed ERAS 2 project portfolio and the Company's proposed approach of recovery for these projects costs for the Minnesota jurisdiction through the Renewable Energy Standard (RES) Rider; and
- Establish a procedural schedule such that the Commission may complete deliberations by mid-May 2026, ahead of a substantial non-refundable payment required upon execution of the Generator Interconnection Agreement (GIA).

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The Company submitted its first ERAS Petition on December 3, 2025 seeking Commission approval of the three projects for which third-party developers submitted an ERAS application to MISO – Sandhill BESS, Benton II BESS, and the incremental capacity that would result from planned upgrades at the Cannon Falls Energy Center (ERAS 1 Petition).¹ MISO had announced the second cycle of projects to be evaluated under its ERAS process on December 1, 2025; the Cannon Falls upgrade was included. Although the list of projects to be studied in Cycle 3 has not yet been published, based on the previously published queue information, the Company anticipates that the remaining projects in our ERAS 1 Petition (Benton II BESS and Sandhill BESS) and the projects proposed in this ERAS 2 Petition will be selected in Cycle 3, which is expected to start on March 2, 2026.

Portions of this Petition are marked “Not-Public” as they contain information the Company considers to be trade secret data as defined by Minn. Stat. § 13.37(1)(b). This data includes confidential negotiation and pricing terms. The information has independent economic value from not being generally known to, and not being readily ascertainable by, other parties who could obtain economic value from its disclosure or use.

We have electronically filed this document with the Minnesota Public Utilities Commission, and copies have been served on the parties on the attached service list. Please contact Shannon Whiton at shannon.whiton@xcelenergy.com or me at jody.l.londo@xcelenergy.com if you have any questions regarding this filing.

Sincerely,

/s/

JODY L. LONDO
DIRECTOR, REGULATORY AND STRATEGIC ANALYSIS

Enclosures
c: Service List

¹ Docket No. E002/RP-24-67.

REQUIRED INFORMATION

I. SUMMARY OF FILING

A one-paragraph summary is attached to this filing pursuant to Minn. R. 7829.1300, subp. 1.

II. SERVICE ON OTHER PARTIES

Pursuant to Minn. Stat. § 216.17, subd. 3, we have electronically filed this document with the Commission. Pursuant to Minn. R. 7829.1300, subp. 2, the Company has served a copy of this filing on the Department of Commerce and the Office of the Attorney General. A summary of the filing has been served on all parties on the enclosed service list.

III. GENERAL FILING INFORMATION

Pursuant to Minn. R. 7829.1300, subp. 3, the Company provides the following information.

A. Name, Address, and Telephone Number of Utility

Northern States Power Company doing business as:
Xcel Energy
414 Nicollet Mall
Minneapolis, MN 55401
(612) 330-5500

B. Name, Address, and Telephone Number of Utility Attorney

Xcel Energy
Ian M. Dobson
Lead Assistant General Counsel
MN1180-08-MCA
414 Nicollet Mall
Minneapolis, MN 55401
(612) 370-3578

C. Date of Filing

The Company submits this Petition on February 20, 2026 for approval.

D. Statute Controlling Schedule for Processing the Filing

No specific statute imposes a schedule controlling the processing of this filing. Under the Commission’s Rules, this Petition falls within the definition of a “miscellaneous” filing under Minn. R. 7829.0100, subp. 11, since no determination of Xcel Energy’s revenue requirement is necessary. Under Minn. R. 7829.1400, in the absence of a Commission notice establishing a different comment period, a person wishing to comment on a miscellaneous filing shall do so within 30 days of the miscellaneous filing.

E. Utility Employee Responsible for Filing

Xcel Energy
Jody L. Londo
Director, Regulatory and Strategic Analysis
MN1180-07-MCA
414 Nicollet Mall
Minneapolis, MN 55401
(612) 216-7954

IV. MISCELLANEOUS INFORMATION

Pursuant to Minn. R. 7829.0700, the Company requests that the following persons be placed on the Commission’s official service list for this proceeding:

Xcel Energy
Ian M. Dobson
Lead Assistant General Counsel
MN1180-08-MCA
414 Nicollet Mall
Minneapolis, MN 55401
ian.m.dobson@xcelenergy.com

Xcel Energy
Christine Marquis
Regulatory Administrator
MN1180-07-MCA
414 Nicollet Mall
Minneapolis, MN 55401
regulatory.records@xcelenergy.com

Any information requests in this proceeding should be submitted to Christine Marquis at the Regulatory Records email address above.

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STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION

Katie J. Sieben	Chair
Hwikwon Ham	Commissioner
Audrey C. Partridge	Commissioner
Joseph K. Sullivan	Commissioner
John A. Tuma	Commissioner

IN THE MATTER OF XCEL ENERGY'S
2024-2040 UPPER MIDWEST
INTEGRATED RESOURCE PLAN

DOCKET NO. E002/RP-24-67

PETITION – ERAS 2

INTRODUCTION

Northern States Power Company, doing business as Xcel Energy, submits to the Minnesota Public Utilities Commission this Petition for approval of two Commission-verified self-build projects for which the Company submitted an Expedited Resource Addition Study (ERAS) application to the Midcontinent Independent System Operator (MISO) in support of the Company's resource needs:

- 300 MW Nobles Battery Energy Storage System (BESS), and
- 300 MW Sherco South BESS.

This Petition follows several prior related Company filings in this docket, noted below:

- July 22, 2025 Letter requesting that the Commission, as the Relevant Electric Retail Regulatory Authority (RERRA), provide verification to the Midcontinent Independent System Operator (MISO) in support of an ERAS for several generator projects;
- August 1, 2025 Letter requesting that the Commission provide verification as the RERRA to MISO in support of an ERAS for four additional generator projects;
- August 1, 2025 Supplement requesting that the Commission provide verification as the RERRA to MISO in support of an ERAS for two additional generator projects;
- September 12, 2025 Letter updating the Commission on the generator projects we requested the Commission to verify as the RERRA to MISO for inclusion in its ERAS process;
- December 3, 2025 Petition requesting approval of purchase power agreements (PPAs) for three Commission-verified projects for ERAS.

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In addition, on October 31, 2025 in Docket No. E002/M-24-230, the Company submitted its recommended portfolio of resources resulting from its 2024 Request for Proposals (2024 RFP Petition), which included the 300 MW Sherco South BESS. While the Company continues to seek approval of the Sherco South BESS using surplus interconnection through the 2024 RFP Petition, we are also proposing this alternative configuration. Under the ERAS interconnection service alternative, the project would obtain valuable interconnection rights, added system flexibility as additional generation resources come online, and additional resource accreditation.

The proposed ERAS projects are expected to deliver benefits to our customers by providing the capacity and energy we need to serve them safely, reliably, and affordably. The portfolio of ERAS projects we present for Commission approval in this Petition will:

- Provide the needed capacity and energy to meet system needs to serve our customers with pricing that aligns with projects selected in recent competitive Requests for Proposals (RFPs);
- Be enabled through the MISO ERAS process, which facilitates timely interconnection of resources to maintain system reliability;
- Enable integration of renewable resources with time-sensitive federal tax credits and improve grid reliability by storing excess energy during periods of surplus and releasing it during peak demand, helping to offset the need for additional peak-generation capacity;
- Deliver voltage-stability and curtailment-reduction benefits, as demonstrated through preliminary engineering and economic screening analyses for the proposed Nobles BESS project;¹
- Provide cost-effective energy storage that supports system operations, enhances power quality, and delivers ancillary services to the regional grid, with pricing that aligns with projects selected in recent competitive RFPs; and
- Create local, union jobs and generate local economic benefits.

Specifically, we request that the Commission take the following actions:

- Find that the Company’s proposed ERAS 2 project portfolio is in the public interest;
- Approve the acquisition and construction of the Company’s proposed ERAS 2 project portfolio and the Company’s proposed approach of recovery for these

¹ See 2025 Biennial Transmission Projects Report, Chapter 9, Appendices C and D, Docket No. E999/M-25-99, (October 31, 2025).

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projects costs for the Minnesota jurisdiction through the Renewable Energy Standard (RES) Rider; and

- Establish a procedural schedule such that the Commission may complete deliberations by mid-May 2026, ahead of a substantial non-refundable payment required upon execution of the Generator Interconnection Agreement (GIA).

EXECUTIVE SUMMARY

With this filing, we are pleased to present a portfolio of projects for which the Company submitted ERAS applications to MISO in support of the Company's resource needs for the following Commission-verified projects:

- 300 MW Nobles BESS, and
- 300 MW Sherco South BESS.

Together, these projects represent an investment that will deliver numerous benefits to our customers while providing the capacity and energy needed to serve them safely, reliably, and affordably.

Despite a challenging landscape, including industry-wide cost pressures, global supply chain disruptions, labor market constraints, and evolving trade policies, the proposed projects reflect a strategic commitment to Minnesota's energy future. The storage projects will enhance grid flexibility and resilience, support renewable integration, and strengthen system reliability. Further, the projects will create high-quality, union jobs and generate lasting economic benefits for local communities. Taking timely action allows the Company to leverage the expedited MISO ERAS interconnection process and use energy storage to support integration of renewable resources with time-sensitive federal tax incentives, minimizing costs for our customers while reinforcing our ability to deliver safe, reliable, and affordable electric service.

Therefore, we respectfully request that the Commission approve the portfolio of ERAS 2 projects as detailed in this Petition.

I. DESCRIPTION AND PURPOSE OF FILING

A. ERAS Process Background

In March 2025, MISO submitted a proposal to the Federal Energy Regulatory Commission (FERC) to establish the ERAS process – a framework designed to accelerate the interconnection study of generation projects that address urgent near-term resource adequacy and reliability needs, in contrast to MISO's standard

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Generation Interconnection queue. In May 2025, FERC rejected MISO’s ERAS proposal, citing concerns that it lacked sufficient limitations on the number of projects that could qualify for the expedited process.

On June 6, 2025, MISO submitted a revised ERAS proposal, incorporating changes intended to address FERC’s concerns.² In that filing, MISO requested that FERC issue an order by July 22, 2025, and proposed an effective date of August 6, 2025, for the revised tariff provisions. On July 21, 2025, FERC issued an Order Accepting Tariff Revisions, Subject to Condition, effective August 6, 2025.³

MISO’s request for expedited action is intended to provide stakeholders with regulatory certainty and sufficient time to prepare for the first ERAS Quarterly Study Period, which began on September 2, 2025. Importantly, applications for the first ERAS cycle were accepted by MISO for study on the effective date of August 6 through August 11, 2025. Projects are studied on a first-come, first-serve basis. Additional details on the ERAS Study Cycle timeline are discussed below.

The Commission, acting as the Relevant Electric Retail Regulatory Authority (RERRA), held a Special Meeting on July 24, 2025, to review and verify a portfolio of wind, solar, and storage projects proposed by Xcel Energy, Minnesota Power, and Otter Tail Power for inclusion in the MISO ERAS process. The Commission accepted and delegated authority to issue verification forms for these projects, which are consistent with the utilities’ approved Integrated Resource Plans and Requests for Proposals, and are intended to address urgent resource adequacy and reliability needs in Minnesota. While the Commission’s verification confirms the projects’ eligibility for the ERAS process, it did not constitute final regulatory approval or a finding that the projects are in the public interest; accordingly, we are now requesting formal Commission approval of these projects.

B. ERAS Timeline and Proposed Projects

1. ERAS Timeline

The ERAS process is a temporary framework established by MISO to accelerate the interconnection of generation projects that address urgent resource adequacy and

² See https://elibrary.ferc.gov/eLibrary/filelist?accession_number=20250606-5228&optimized=false&sid=55a6cd0e-52a6-4562-94d4-9515c0d8d504. See also [Microsoft Word - ERAS Informational Guide](#).

³ See *Midcontinent Indep. Sys. Operator, Inc.*, 192 FERC ¶ 61,064 (2025). Available at: <https://elibrary.ferc.gov/eLibrary/filedownload?fileid=00f4c255-0a76-c909-8b03-983013300000>.

The Order is subject to a further compliance filing to clarify that section 3.9.2 of the Generator Interconnection Procedures (GIP) does not cap at 10 the maximum number of ERAS interconnection requests that may be submitted by independent power producers.

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reliability needs.⁴ The process officially began on August 6, 2025, at 8:00 a.m. EST, when MISO opened its online application portal. MISO accepts ERAS applications on a rolling basis. To be considered for a specific quarterly study cycle, applications are required to be submitted at least 15 business days prior to the cycle's kickoff. For the first cycle, which began on September 2, 2025, the application deadline was August 11, 2025. Once submitted, MISO has 15 business days to review applications for completeness. If deficiencies are identified, applicants are notified and given 10 business days to correct them. If deficiencies are not cured by the kickoff date, the project is deferred to a future cycle.

ERAS operates on a quarterly study cycle schedule, with four study periods each year:

- **Quarter 1:** First business day of March through the last business day of May.
- **Quarter 2:** First business day of July through the last business day of August.
- **Quarter 3:** First business day of September through the last business day of November.
- **Quarter 4:** First business day of December through the last business day of February.

Each quarterly cycle was limited to 10 projects, which are selected on a first-come, first served basis and evaluated for geographic and technical compatibility. However, on November 25, 2025, FERC approved MISO's request to expand the quarterly project study limit from 10 to 15 projects.⁵ Projects are evaluated sequentially and are expected to be completed within 60 days of the study kickoff. The ERAS projects undergo the same suite of studies conducted under MISO's Definitive Planning Process.

Following completion of the study, the Generation Interconnection Agreement (GIA) negotiation and issuance process begins. The Interconnection Customer (IC) and Transmission Owner (TO) have 20 business days to negotiate the GIA. MISO then has 10 business days to provide the final Expedited GIA (EGIA). Once the EGIA is issued, the IC and TO have 10 business days to execute it or request that MISO file it unexecuted. MISO then has an additional 10 business days to execute and/or file an unexecuted EGIA with FERC.

In total, the ERAS process – from application submission to GIA issuance – is designed to be completed within approximately three calendar months. Based on this timeline, we anticipate GIA negotiations for the proposed projects to start in early

⁴ See MISO's *Expedited Resource Addition Study: An overview of how the Expedited Resource Addition Study (ERAS) process will be implemented and the requirements for completing an ERAS application*. Available at <https://cdn.misoenergy.org/ERAS%20Informational%20Guide707493.pdf>

⁵ See [MISO to Expand Number of Interconnection Requests it Can Study on Expedited Basis | Washington Energy Report](#).

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May 2026 and conclude no later than May 29, 2026. At this time, the IC would be required to make a non-refundable payment of \$24,000/MW.

2. Current ERAS Application Status and Commission Approval Requests

On August 6, 2025, the Company submitted an ERAS application to MISO for the following Commission verified projects:

- 300 MW Nobles BESS and
- 300 MW Sherco South BESS.

Additionally, third-party developers submitted ERAS applications to MISO in support of the Company's resource needs for the following Commission-verified projects:

- 200 MW Sandhill BESS,
- 100 MW Benton II Solar plus 300 MW Benton II BESS, and
- 45-70 MW of incremental capacity that would result from planned upgrades at the Cannon Falls Energy Center.

On September 4, 2025, MISO announced the first 10 projects selected for study in ERAS Cycle 1 (2025, Quarter 3).⁶ Selection was based on application submission time, common constraint review, application withdrawals, and timely cure of application deficiencies. None of the projects the Company proposed for RERRA verification were selected for study in Cycle 1. On December 1, 2025, MISO announced the second cycle of projects to be evaluated under its ERAS process. The second cycle includes 15 projects, totaling approximately 6,100 MW of proposed new capacity.⁷ The only Company project included in this second cycle is the incremental capacity associated with planned upgrades at the Cannon Falls Energy Center.

On December 3, 2025, the Company filed a Petition seeking Commission approval of the three projects for which third-party developers submitted an ERAS application to MISO – Sandhill BESS, Benton II BESS, and the incremental capacity that would result from planned upgrades at the Cannon Falls Energy Center (ERAS 1 Petition).⁸

Although the list of projects to be studied in Cycle 3 has not yet been published, based on the previously published queue information, the Company anticipates that the remaining projects in our ERAS 1 Petition (Benton II BESS and Sandhill BESS) and the projects proposed in this petition will be selected in Cycle 3, which is expected to start on March 2, 2026.

⁶ See [ERAS Cycle 1717096.pdf](#).

⁷ See [ERAS Interconnection Requests718482.xlsx](#).

⁸ Docket No. E002/RP-24-67.

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In this petition, we are seeking Commission approval of the Nobles BESS and Sherco South BESS.⁹ Additional details on each of the projects are provided in Section IV. below.

II. ACQUISITION PROCESS

The ERAS 2 portfolio includes projects that were not sourced through a competitively bid process. However, these projects supplement the Company's recent broader efforts to competitively procure resources, which also served to inform pricing. On June 28, 2024, the Company issued an RFP seeking 1,600 MW of wind, solar, storage, and hybrid resources with commercial operation dates (COD) through 2029 (2024 RFP).¹⁰ The purpose of this RFP was to select resources to fill an identified system need as identified in the Company's approved 2024 Integrated Resource Plan (IRP) Five-Year Action Plan, and to enable reuse of interconnection rights that will become available as Sherco Units 1 and 3 in Becker, Minnesota retire in 2026 and 2030 and Blue Lake Units in Shakopee, Minnesota retire in 2025 and 2026.

On October 31, 2025, we filed a petition for approval of a portfolio of solar and storage projects selected through our 2024 RFP Petition. The portfolio includes 768 MW of solar capacity and 855.5 MW / 3,422 MWh of BESS capacity – an investment that will deliver numerous benefits to our customers while providing the capacity and energy needed to serve them safely, reliably, and affordably.¹¹

To maintain consistency and ensure cost-effectiveness, indicative pricing from the 2024 RFP has been used to evaluate the ERAS storage projects as further discussed in Section V.B. below.

III. STATE OF THE INDUSTRY

The industry continues to face sustained and overlapping cost pressures and uncertainty that impact the economics of generation resources. Global supply chain disruptions, rising demand, labor market constraints, higher interest rates, evolving trade policies, and new tax regulations are collectively increasing project development

⁹ The Sherco South BESS is included in our 2024 RFP Petition in Docket No. E002/M-24-230 and is proposed to interconnect at the Sherburne County Substation using surplus interconnection service. As noted in the 2024 RFP Petition, execution of a separate GIA with MISO would provide valuable accredited capacity for this resource, thereby strengthening its contribution to overall resource adequacy; however, it would also result in additional network upgrade costs.

¹⁰ Docket No. E002/M-24-230.

¹¹ Negotiations are ongoing for two selected build-transfer distributed solar projects in Wisconsin – One Energy Portfolio 1 and 2. Both projects are located in Wisconsin and fall under the jurisdiction of the Wisconsin Public Service Commission.

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and operation costs. Combined with global geopolitical uncertainty, these factors have heightened project risk and influenced PPA pricing. While project-specific conditions, sensitivities, and mitigation strategies vary – and not all dynamics affect pricing – a comprehensive discussion of these factors is included in Section II of our 2024 RFP Petition.

IV. PROJECT OVERVIEW

We provide an overview of the Nobles BESS and Sherco South BESS projects below.

A. Nobles Energy Storage

The 300 MW/1,200 MWh Nobles Energy Storage project is being developed by Xcel Energy on approximately 25 acres of existing Company-owned property at the Nobles Wind Farm in Nobles County, Minnesota. The Company has full site control, and the Commercial Operation Date (COD) is targeted for 2028.

This project also aligns with the Commission’s March 24, 2025 Order in Docket No. E999/CI-24-316 (Transmission Curtailment Order), which highlights battery energy storage as a promising solution to alleviate transmission congestion in the Nobles County Substation area. As noted in the Order, battery storage can help shift excess wind generation to periods of lower output, potentially reducing curtailments and improving grid reliability.

To that end, the Company performed a screening System Impact Study (SIS) to evaluate the voltage stability benefits of a future BESS in the local area around the Nobles 115/345 kV substation. The study determined that a 300 MW BESS equipped with a grid forming inverter would provide dynamic voltage stability benefits during high-wind dispatch conditions. These benefits are specifically associated with the use of a grid-forming inverter.¹²

The Company also performed a screening economic analysis using historical Locational Marginal Prices (LMPs) to determine if there would be any economic benefit to adding a 300 MW BESS at the Nobles County substation. The preliminary results indicate that the BESS would have a positive impact on curtailments in the area.¹³

¹² See 2025 Biennial Transmission Projects Report, Docket No. E999/M-25-99, Appendix C (October 31, 2025).

¹³ See 2025 Biennial Transmission Projects Report, Docket No. E999/M-25-99, Appendix D (October 31, 2025).

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The estimated interconnection upgrade cost is currently based on the best available information; however, actual upgrade costs will not be known until MISO completes its study, which we expect to receive in early May.

Project details for the Nobles BESS are summarized in Table 1.

**Table 1
Nobles BESS Project Details**

Nameplate Capacity	300 MW/1,200 MWh BESS
Developer	Xcel Energy
Project Location	Reading, Minnesota
Project Structure	Self-Build
Anticipated COD	Q2 2028
Project Life	20 years
	[PROTECTED DATA BEGINS
LCOC (\$/kW-mo)	
Total Capital Cost with AFUDC	
	PROTECTED DATA ENDS]
Estimated construction jobs created*	85
Estimated landowner payments	N/A
Estimated local tax payments*	\$87 million

** Construction jobs estimated at peak construction activity. Total payments over the life of the project.*

B. Sherco South Energy Storage

The 300 MW/1,200 MWh Sherco South Energy Storage project is being developed by Xcel Energy and will be located on approximately 25 acres of existing Company-owned property, directly south of Sherco Generating Station in Becker, Minnesota. The project was bid into Xcel Energy’s 2024 Wind, Solar, and Storage Request for Proposal and is included in our October 31, 2025 Petition seeking Commission approval of a portfolio of resources selected in our 2024 RFP.¹⁴ While the project was initially planned as surplus interconnection at the Sherburne County Substation, the Company now believes that, with the timing shift introduced by the ERAS process, interconnection through MISO offers greater value to both the project and the broader system by enabling additional valuable interconnection rights, as further discussed below. The cost of interconnection upgrades required for the independent ERAS interconnection is currently based on the best available information; however, actual upgrade costs will not be known until MISO completes its study, which we expect to receive in early May.

¹⁴ Docket No. E002/M-24-230.

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The Company has 100 percent site control, and the Commercial Operation Date (COD) is targeted for November 2027.

Project details for the Sherco South BESS are summarized in Table 2.

**Table 2
Sherco South BESS Project Details**

Nameplate Capacity	300 MW/1,200 MWh BESS
Developer	Xcel Energy
Project Location	Becker, Minnesota
Project Structure	Self-Build
Anticipated COD	Q4 2027
Project Life	20 years
	[PROTECTED DATA BEGINS
LCOC (\$/kW-mo), 2024 RFP (Surplus Interconnection)	
LCOC (\$/kW-mo), ERAS 2 (Independent ERAS Interconnection)	
Total Capital Cost with AFUDC, 2024 RFP (Surplus Interconnection)	
Total Capital Cost with AFUDC, ERAS 2 (Independent ERAS Interconnection)	
	PROTECTED DATA ENDS]
Estimated construction jobs created*	85
Estimated landowner payments	N/A
Estimated local tax payments*	\$124 million

** Construction jobs estimated at peak construction activity. Total payments over the life of the project.*

An interconnection agreement through ERAS grants the Sherco South BESS project with independent interconnection rights, providing greater certainty that the resource can perform as expected during peak and reliability-critical hours while preserving the Project’s ability to pursue future expansion and long-term system value. By contrast, surplus interconnection service relies on the unused capability of an existing host facility and requires coordination to ensure compliance with the original interconnection limit, which can limit operational flexibility when accredited capacity is most critical.¹⁵ Consistent with the Company’s historical valuation of new interconnection rights for solar and wind resources at approximately \$200,000 - \$500,000 per MW, and its more

¹⁵ Surplus Interconnection Service is restricted Interconnection Service that allows an Interconnection Customer to increase the gross generating capability at the same Point of Interconnection of an Existing Generating Facility without increasing the total amount of Interconnection Service at the Point of Interconnection. The total combined generating output at the Point of Interconnection for both the original and surplus Interconnection Customer is limited to and shall not exceed the total amount of Interconnection Service of an Existing Generating Facility.

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recent refinement of that estimate to \$250,000 per MW across all resources – a 300 MW dedicated interconnection reasonably represents approximately \$75 million in incremental system value.¹⁶ Accordingly, the interconnection service provided by ERAS at an estimated incremental capital cost of \$26.1 million delivers significant system value through the acquisition of independent interconnection rights that ensure deliverable accredited capacity and enable future expansion.

V. DEMONSTRATION OF NEED AND ECONOMIC ANALYSIS

A. Demonstration of Need for ERAS Projects

The ERAS 2 projects in this Petition are consistent with our approved 2024 IRP and align with both Xcel Energy’s and Minnesota’s clean energy transition strategy. The Five-Year Action Plan of our approved 2024 IRP includes the addition of significant levels of wind, solar, and storage resources in addition to the Firm Dispatchable resources approved in the IRP Order.

Further, the Company’s updated resource modeling conducted for the 2024 RFP confirms that additional capacity is required to maintain reliability and meet customer demand under current and projected system conditions. As described below, the updated analysis indicates a significant increase in resource needs compared to our 2024 IRP. This increase is driven by sustained load growth and the anticipated expiration of federal tax incentives after 2030.

In our updated modeling for the 2024 RFP, the Company removed 1,600 MW of generic resources through 2030 to create a capacity void that the 2024 RFP proposed portfolio of 1,624 MWs is intended to fill. We then locked in the remaining 1,860 MW of generic resources through 2029 and allowed the model to select additional resources in 2030. These locked-in generic resources are intended to represent a minimal proxy for pending acquisitions through the Development Transfer RFP and potential ERAS projects. By allowing the model to select additional resources in 2030, we are able to address future needs under updated assumptions that reflect practical timing constraints for new resource additions beyond those contemplated in current resource acquisition processes.

¹⁶ See July 25, 2021 Reply Comments, Docket No. E002/RP-19-368, for historical valuation of new interconnection. The Company more recently applied an interconnection cost assumption of \$250/kw for new resource connections in our 2024-2040 Upper Midwest Integrated Resource Plan, Docket No. E002/RP-24-67 (February 1, 2024). The basis for this assumption is discussed in Appendix L: System Planning Integration.

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A summary of the additional resources based on the IRP and the updated 2024 RFP modeling using the updated load forecast is shown in Table 3.

**Table 3
Updated Five-Year Action Plan**

	Approved Five-Year Action Plan (MWs)	Proposed 2024 RFP Portfolio, Dev Transfer and ERAS Projects Included in Analysis
Standalone Storage	600	916
Wind	3,200	1,800
Solar	400	768
Total	4,200	3,484
Remaining Wind/Solar/Storage Need Based on IRP		716
Updated Remaining Wind/Solar/Storage Need		3,500

The updated modeling demonstrates that even with the inclusion of the proposed 2024 RFP portfolio and proxy resources, the system requires an additional 3,500 MW of resources by 2030. This result underscores the value of near-term procurement.

Accordingly, the proposed ERAS 2 projects will provide valuable contributions to meeting capacity requirements, maintaining system reliability, and mitigating exposure to future cost volatility. The ERAS process is a valuable tool to help bring these resources onto the grid in a timely manner.

B. BESS Project Cost Parity with 2024 RFP Projects

As previously indicated, the Sherco South BESS project was bid into Xcel Energy’s 2024 Wind, Solar, and Storage RFP and is included in our October 31, 2025 Petition seeking Commission approval of a portfolio of resources selected in our 2024 RFP. While the project was initially planned as surplus interconnection at the Sherburne County Substation, the Company now believes that, with the timing shift introduced by the ERAS process, independent interconnection through MISO’s ERAS process offers greater value to both the project and the broader system by enabling valuable additional interconnection rights. The Sherco South and Nobles BESS projects are consistent with our approved 2024 IRP and support both Xcel Energy’s and Minnesota’s clean energy transition strategy.

As shown in Table 4 below, the pricing for these ERAS 2 resources aligns with pricing in our 2024 RFP.

Table 4
2024 RFP and Proposed ERAS Project BESS Pricing

Project	Size (MW)	Cost of Capacity (\$/kw-month)
		[PROTECTED DATA BEGINS
Nobles BESS	300	
Sherco South BESS (Independent ERAS Interconnection)	300	
Sherco South BESS (Surplus Interconnection)	300	
Blue Lake BESS	135.5	
Crowned Ridge BESS	120	
Crane BESS	200	
Mayhew BESS	100	
Sandhill BESS	200	
Benton II BESS	300	

PROTECTED DATA ENDS]

C. EnCompass Analysis of Projects

In order to determine the benefits provided by the ERAS 2 projects, the Company conducted an additional economic analysis using updated EnCompass modeling.

1. Model Updates Incorporated for Analysis

The updated base case scenario builds on the EnCompass modeling described in Section VII(C) of the ERAS 1 Petition, with appropriate changes to modeling inputs and assumptions that reflect important updates, and continued refinement of modeling practices. Specifically, we updated the ERAS 1 model with the following:

- Resource updates:**
 Consistent with the 2024 RFP modeling and our approved IRP Settlement Agreement, the model includes the Lyon County CT, Cannon Falls PPA extension, MEC 1 PPA extension with BESS, North Star BESS, Sherco West BESS, and the portfolio of projects included in the 2024 RFP Petition, inclusive of the original Sherco South BESS, as well as the ERAS 1 Petition (Cannon Falls Expansion, Benton BESS, and Sandhill BESS). The model also includes the Wind Development Transfer projects using generic resource costs

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without transmission.¹⁷ No additional generic CT additions were available before 2030.

- **Open capacity purchase at CONE and energy purchase between 2027 and 2029:**

Between 2027 and 2029, the model allows market purchases of capacity at MISO’s current Cost of New Entry (CONE) and energy from the market reflecting an alternative that may be theoretically available to the Company in the absence of the ERAS portfolio projects. Further, unlike an assumed generic or alternative contract/project life extension, it is a cost that is publicly known and can be easily sized by the model in order to balance reserve margin needs while solving for the least-cost generation mix. This assumption was necessary to develop the baseline capacity expansion plan.

- **Market capacity and energy purchases are closed beginning in 2030:**

After 2030, the model no longer allows market purchases of capacity or energy to meet system needs. All requirements must be met through owned or contracted resources to reduce exposure to market volatility and ensure compliance with future regulatory requirements. This assumption was necessary to develop the baseline capacity expansion plan.

To complete the baseline scenario, we locked in 3,500 MW of generic resources (wind, solar) and 400 MW of generic solar at King in 2030, consistent with the approved resource targets in our last resource plan.¹⁸

2. *EnCompass Analysis of ERAS Portfolio*

After we created the baseline capacity expansion plan – including assumed capacity purchases in any years where the reserve margin would not otherwise be met – we performed a PVRR and PVSC production cost run to compare the ERAS 2 projects against the ERAS 1 base scenario. This evaluation considered scenarios both with and without the consideration of the future regulatory costs of carbon. The base scenario uses the latest load forecast (2025v2) and assumes production tax credits (PTCs) for generic resources through 2030 and no PTCs beyond 2030, to evaluate the resulting planning impacts.

For the ERAS 2 portfolio evaluation, the Sherco South BESS project costs from the 2024 RFP portfolio were replaced with new Sherco South BESS revenue requirements that reflect the ERAS project costs. The ERAS 2 portfolio projects were forced into

¹⁷ Docket No. E002/M-23-342.

¹⁸ Documentation of our updated demand and energy forecasts and generic resource costs are included as Attachment O to our 2024 RFP Petition.

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the model, and market purchases of capacity and energy were turned off beginning in 2030. The ERAS 2 portfolio model run provides a capacity expansion plan – including the selected projects – that can be processed through production cost modeling to produce PVSC and PVRR results for comparison against the baseline scenario. The PVSC and PVRR results are then compared to the baseline values described above to determine the total benefits or costs of the ERAS portfolio relative to the Base Case.

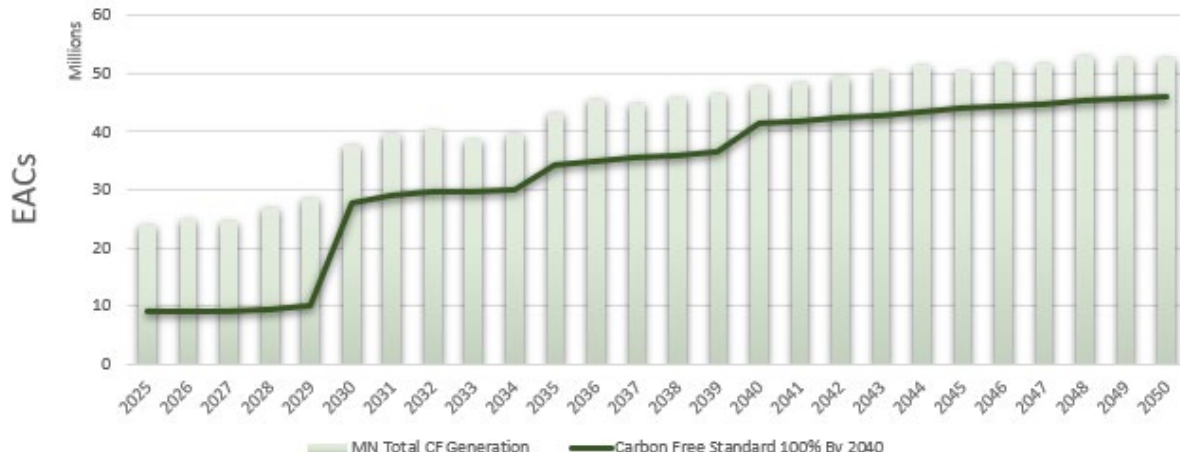
As shown below in Table 5, the results indicate that the ERAS 2 portfolio is expected to have a minimal cost impact on a PVSC basis through 2050. The addition of the ERAS 2 projects result in an increase of \$105 million on a PVSC basis and \$107 million on a PVRR basis over the 2024-2050 timeframe. This an increase of approximately 0.12 percent relative to total system costs. The capacity offered by the Sherco South BESS and Nobles BESS will offset capacity that would otherwise need to be acquired and enable more renewable additions. Given the current challenges in the broader market as discussed above, we believe this cost impact is reasonable and mitigates against the risk that higher priced resources will need to be acquired in the future.

**Table 5
PVSC and PVRR Resulting from the ERAS 2 Portfolio (\$2024 millions)**

PVSC	Delta from ERAS 2 Base in NPV 2024-2050 (\$ millions)	NPV 2024-2050 (\$ millions)
ERAS 2 Base Scenario	--	\$84,138
ERAS 2 Portfolio	\$105	\$84,243
PVRR	Delta from ERAS 2 Base in NPV 2024-2050 (\$ millions)	NPV 2024-2050 (\$ millions)
ERAS 2 Base Scenario	--	\$64,638
ERAS 2 Portfolio	\$107	\$64,745

Cumulative CO₂ emissions under the ERAS 2 portfolio range from a minor increase of 0.01 million tons on a PVSC basis to a decrease of 0.22 million tons on a PVRR basis from 2025 to 2040. Further, as shown in Figure 1 below, and based on current resource planning forecasts, the Company projects compliance with the Carbon-Free Standard (CFS) under Minn. Stat. § 216B.1691, subd. 2g. This standard requires that 80 percent of retail sales in Minnesota be generated by carbon-free energy technologies by 2030 and 100 percent of retail sales in Minnesota be generated by carbon free energy by 2040. The Company expects to maintain compliance with the CFS beyond 2040 with the addition of Sherco South BESS and Nobles BESS.

Figure 1
Minnesota CFS Compliance Position
Including Sherco South BESS and Nobles BESS



VI. COST RECOVERY FOR ERAS 2 PROJECTS

The Company respectfully requests Commission approval to recover costs associated with the Sherco South and Nobles BESS projects through the RES Rider, pursuant to Minn. Stat. § 216B.1645.

Section (3) of Minn. Stat. § 216B.1645 allows recovery of other expenses incurred that are directly related to a renewable energy project, including expenses for energy storage, provided that the utility demonstrates to the Commission’s satisfaction that the expenses improve project economics, ensure project implementation, advance research and understanding of how storage devices may improve renewable energy projects, or facilitate coordination with the development of transmission necessary to transport energy produced by the project to market.

While the Sherco South BESS and Nobles BESS will be charged from the grid, they are designed to support the integration, reliability, and optimization of renewable energy resources across the Company’s system. The projects align with the statutory intent and Commission precedent for cost recovery under the RES Rider and will contribute to the Company’s – and the State’s – broader strategy of enabling higher renewable penetration and grid decarbonization.

Battery storage systems such as the Sherco South and Nobles BESS projects advance research and understanding of how storage devices may improve renewable energy projects, as intended by the statute. The projects allow for storage of excess electricity generated by other power producers during periods of low electricity demand, with the

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ability to send the electricity back to the grid when demand increases. Beyond supporting the goals of the IRP, the projects aim to support Minnesota’s transition to a carbon-free electricity supply by enabling wind and solar projects to continue generating clean energy instead of being curtailed due to low demand. By charging an ESS, it can store excess energy during these periods and discharge it during times of higher demand, such as daytime or evening hours, helping to supplement existing generation and potentially reducing reliance on traditional thermal sources like natural gas.

The impact to the grid from the integration of BESSs will advance research and understanding of how storage devices may improve renewable energy projects, including:

- **Supports integration of renewable energy:** The integration of BESS enables higher and more efficient use of existing and new renewable energy sources.
- **Frequency response and regulation:** Strong BESS infrastructure provides moment-to-moment stability for the electrical system more efficiently than existing natural gas resources.
- **Reduce energy waste:** BESS stores energy when there is an excess supply and discharges that energy back onto the grid when supply is low.
- **Grid Resiliency:** BESS can support recovery from storms and other grid emergencies by more efficiently using the operating portions of the grid and providing the grid operator and utility additional flexibility while they work to restore the system.

Recovery of the costs for these projects is consistent with the RES Rider. The projects are designed to advance research and support the integration, reliability, and optimization of renewable energy resources across the Company’s system. They will store excess energy during periods of surplus and release it during peak demand, helping offset the need for additional peak-generation capacity, while also supporting renewable integration, grid stability, and operational efficiency. We therefore request recovery of the Sherco South BESS and Nobles BESS project through the RES Rider.

Given current market conditions and industry challenges, the Company proposes that the Commission preserve the opportunity for the Company to seek recovery of additional costs if certain market dynamics arise – including changes in tariff laws that impact the global supply chain – while also ensuring that any savings achieved are provided to customers. As always, the Company will account for all project costs and bear the burden to demonstrate prudence in future requests for cost recovery.

This approach is consistent with the Commission’s October 25, 2023 Order, Docket No. E002/M-22-403, *In the Matter of the Petition of Northern States Power Company, d/b/a Xcel Energy, for Approval of Sherco Solar 3 and Apple River Solar Power Purchase Agreement*, Order

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Point 5a, and the Commission’s May 13, 2025 Order, Docket No. E015/M-24-344, *In the Matter of the Petition of Minnesota Power for Approval of Investments and Expenditures in the Boswell Solar Project for Recovery through Minnesota Power’s Renewable Resources Rider Under Minn. Stat. § 216B.1645*, Order Point 5.

CONCLUSION

In this filing, we have discussed a portfolio of firm dispatchable and storage projects that are in the public interest. The portfolio of ERAS 2 projects we present for Commission approval in this Petition will:

- Provide the needed capacity and energy to meet system needs to serve our customers with pricing that aligns with projects selected in recent competitive RFPs;
- Be enabled through the MISO ERAS process, which facilitates timely interconnection of resources to maintain system reliability;
- Enable integration of renewable resources with time-sensitive federal tax credits and improve grid reliability by storing excess energy during periods of surplus and releasing it during peak demand, helping to offset the need for additional peak-generation capacity;
- Provide cost-effective energy storage that supports system operations, enhances power quality, and delivers ancillary services to the regional grid, with pricing that aligns with projects selected in recent competitive RFPs; and
- Create local, union jobs and generate local economic benefits.

Specifically, we request that the Commission take the following actions:

- Find that the Company’s proposed ERAS 2 project portfolio is in the public interest;
- Approve the acquisition and construction of the Company’s proposed ERAS 2 project portfolio and the Company’s proposed approach of recovery for these projects costs for the Minnesota jurisdiction through the Renewable Energy RES Rider; and
- Establish a procedural schedule such that the Commission may complete deliberations by mid-May 2026, ahead of a substantial non-refundable payment required upon execution of the GIA.

Dated: February 20, 2026

Northern States Power Company

STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION

Katie J. Sieben	Chair
Hwikwon Ham	Commissioner
Audrey C. Partridge	Commissioner
Joseph K. Sullivan	Commissioner
John A. Tuma	Commissioner

IN THE MATTER OF XCEL ENERGY'S
2024-2040 UPPER MIDWEST INTEGRATED
RESOURCE PLAN

DOCKET NO. E002/RP-24-67

PETITION – ERAS 2

SUMMARY OF FILING

Please take notice that on February 20, 2026, Northern States Power Company, doing business as Xcel Energy, filed with the Minnesota Public Utilities Commission a Petition requesting approval of two Commission-verified self-build projects for which the Company submitted an Expedited Resource Addition Study (ERAS) application to the Midcontinent Independent System Operator (MISO) in support of the Company's resource needs: (1) 300 MW Nobles Battery Energy Storage System (BESS), and (2) 300 MW Sherco South BESS.

CERTIFICATE OF SERVICE

I, Victor Barreiro, hereby certify that I have this day served copies or summaries of the foregoing documents on the attached list(s) of persons.

xx by depositing a true and correct copy thereof, properly enveloped with postage paid in the United States Mail at Minneapolis, Minnesota

or

xx electronic filing

Docket No. E002/RP-24-67

Dated this 20th day of February 2026

/s/

Victor Barreiro
Regulatory Administrator

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
1	Steve	Albrecht	steve.albrecht@shakopeedakota.org	Shakopee Mdwakanton Sioux Community		Shakopee Mdwakanton Sioux Community 2330 Sioux Trail NW Prior Lake MN, 55372 United States	Electronic Service		No	24-67
2	Jared	Alholinna	jaholinna@grenergy.com	Great River Energy		12300 Elm Creek Boulevard Maple Grove MN, 55369 United States	Electronic Service		No	24-67
3	Keith	Anderson	keith.anderson@shakopeedakota.org	Shakopee Mdwakanton Sioux Community		Shakopee Mdwakanton Sioux Community 2330 Sioux Trail NW Prior Lake MN, 55372 United States	Electronic Service		No	24-67
4	Shannon	Anderson	sanderson@solarunitedneighbors.org	Solar United Neighbors			Electronic Service		No	24-67
5	Beren	Argetsinger	bargetsinger@keyesfox.com			PO BOX 166 Burdett NY, 14818 United States	Electronic Service		No	24-67
6	Ray	Auginaush, Sr.	ray.auginaush@whiteearth-nsn.gov	White Earth Nation		White Earth Tribal Headquarters 35500 Eagle View Road Ogema MN, 56569 United States	Electronic Service		No	24-67
7	Mark	Bakk	mbakk@lcp.coop	Lake Country Power		26039 Bear Ridge Drive Cohasset MN, 55721 United States	Electronic Service		No	24-67
8	Daniel	Becchetti	dbecchetti@grenergy.com	Great River Energy		12300 Elm Creek Boulevard Maple Grove MN, 55369 United States	Electronic Service		No	24-67
9	Todd	Beck	tbeck@grenergy.com			null null, null United States	Electronic Service		No	24-67
10	Amadeo	Bellino	amadeo.bellino@whiteearth-nsn.gov	White Earth Nation		White Earth Tribal Headquarters 35500 Eagle View Road Ogema MN, 56569 United States	Electronic Service		No	24-67
11	Melanie	Benjamin	melanie.benjamin@millelacsband.com			43408 Oodena Drive Onamia MN, 56359 United States	Electronic Service		No	24-67
12	Sasha	Bergman	sasha.bergman@state.mn.us		Public Utilities Commission	121 7th P I E Ste 350 St. Paul MN, 55101 United States	Electronic Service		Yes	24-67
13	Laura	Bishop	laura.bishop@state.mn.us		Minnesota Pollution Control Agency	520 Lafayette Rd Saint Paul MN, 55155 United States	Electronic Service		No	24-67

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
14	Ingrid	Bjorklund	ingrid@bjorklundlaw.com	Bjorklund Law, PLLC		855 Village Center Drive #256 North Oaks MN, 55127 United States	Electronic Service		No	24-67
15	Hunter	Boldt	hunterboldt@redlakenation.org	Red Lake Nation		15484 Migizi Drive Red Lake MN, 56671 United States	Electronic Service		No	24-67
16	Peter	Boney	pboney@boisforte-nsn.gov	Bois Forte Band of Chippewa		Bois Forte Tribal Government 5344 Lakeshore Drive Nett Lake MN, 55772 United States	Electronic Service		No	24-67
17	Sheldon	Boyd	sheldon.boyd@millelacsband.com	Mille Lacs Band of Ojibwe		43408 Oodena Drive Onamia MN, 56359 United States	Electronic Service		No	24-67
18	Jon	Brekke	jbrekke@grenergy.com	Great River Energy		12300 Elm Creek Boulevard Maple Grove MN, 55369-4718 United States	Electronic Service		No	24-67
19	Matthew	Brodin	mbrodin@allete.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	24-67
20	B. Andrew	Brown	brown.andrew@dorsey.com	Dorsey & Whitney LLP		Suite 1500 50 South Sixth Street Minneapolis MN, 55402-1498 United States	Electronic Service		No	24-67
21	Marvin Ray	Bruneau	marvin.bruneau@millelacsband.com	Mille Lacs Band of Ojibwe		43408 Oodena Drive Onamia MN, 56359 United States	Electronic Service		No	24-67
22	Christina	Brusven	cbrusven@fredlaw.com	Fredrikson Byron		60 S 6th St Ste 1500 Minneapolis MN, 55402-4400 United States	Electronic Service		No	24-67
23	Scott	Buchanan	scottbuchanan@fdlrez.com	Fond du Lac Band of Lake Superior Chippewa		1720 Big Lake Road Cloquet MN, 55720 United States	Electronic Service		No	24-67
24	Shelley	Buck	shelley.buck@piic.org	Prairie Island Indian Community		Prairie Island Indian Community 5636 Sturgeon Lake Road Welch MN, 55089 United States	Electronic Service		No	24-67
25	Robert	Budreau	robert.budreau@llojibwe.net	Leech Lake Band of Ojibwe		190 Sailstar Drive NW Cass Lake MN, 56633 United States	Electronic Service		No	24-67

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
26	Mike	Bull	mike.bull@state.mn.us		Public Utilities Commission	121 7th Place East, Suite 350 St. Paul MN, 55101 United States	Electronic Service		Yes	24-67
27	Cathy	Chavers	cchavers@boisforte-nsn.gov	Bois Forte Band of Chippewa		Bois Forte Tribal Government 5344 Lakeshore Drive Nett Lake MN, 55772 United States	Electronic Service		No	24-67
28	Marc	Child	mchild@greenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	24-67
29	John	Coffman	john@johncoffman.net	AARP		871 Tuxedo Blvd. St. Louis MO, 63119-2044 United States	Electronic Service		No	24-67
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	24-67
31	George	Crocker	gwillc@nawo.org	North American Water Office		5093 Keats Avenue Lake Elmo MN, 55042 United States	Electronic Service		No	24-67
32	Rebecca	Crooks Stratton	rebecca.crooks-stratton@shakopeedakota.org	Shakopee Mdewakanton Sioux Community		Shakopee Mdewakanton Sioux Community 2330 Sioux Trail NW Prior Lake MN, 55372 United States	Electronic Service		No	24-67
33	Brooke	Cunningham	health.review@state.mn.us	Minnesota Department of Health		PO Box 64975 St. Paul MN, 55164-0975 United States	Electronic Service		No	24-67
34	Miyah	Danielson	miyahdanielson@fdlrez.com	Fond du Lac Band of Lake Superior Chippewa		1720 Big Lake Road Cloquet MN, 55720 United States	Electronic Service		No	24-67
35	Jason	Decker	jason.decker@llojibwe.net	Leech Lake Band of Ojibwe		190 Sailstar Drive NW Cass Lake MN, 56633 United States	Electronic Service		No	24-67
36	Bobby	Deschampe	robertdeschampe@grandportage.com	Grand Portage Band of Lake Superior Chippewa		PO Box 428 Grand Portage MN, 55605 United States	Electronic Service		No	24-67
37	Kami	Diver	kamidiver@fdlrez.com	Fond du Lac Band of Lake Superior Chippewa		1720 Big Lake Road Cloquet MN, 55720 United States	Electronic Service		No	24-67
38	Becky	Dobbs	bdobbs@greenergy.com			null null, null United States	Electronic Service		No	24-67

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
39	Ian M.	Dobson	ian.m.dobson@xcelenergy.com	Xcel Energy		414 Nicollet Mall, 401-8 Minneapolis MN, 55401 United States	Electronic Service		No	24-67
40	Shane	Drift	sdrift@boisforte-nsn.gov	Bois Forte Band of Chippewa		Bois Forte Tribal Government 5344 Lakeshore Drive Nett Lake MN, 55772 United States	Electronic Service		No	24-67
41	Christopher	Droske	christopher.droske@minneapolismn.gov	Northern States Power Company dba Xcel Energy-Elec		661 5th Ave N Minneapolis MN, 55405 United States	Electronic Service		No	24-67
42	Adam	Duininck	aduininck@ncsrcc.org	North Central States Regional Council of Carpenters		700 Olive Street St. Paul MN, 55130 United States	Electronic Service		No	24-67
43	Wally	Dupuis	wallydupuis@fdlband.org	Fond du Lac Band of Lake Superior Chippewa		1720 Big Lake Road Cloquet MN, 55720 United States	Electronic Service		No	24-67
44	Kevin	Dupuis, Sr.	kevindupuis@fdlrez.com			Reservation Business Committee 1720 Big Lake Rd Cloquet MN, 55720 United States	Electronic Service		No	24-67
45	Jamie	Edwards	jamie.edwards@millelacsband.com	Mille Lacs Band of Ojibwe		43408 Oodena Drive Onamia MN, 56358 United States	Electronic Service		No	24-67
46	Michael	Fairbanks	michael.fairbanks@whiteearth-nsn.gov	White Earth Reservation Business Committee		PO Box 418 White Earth MN, 56591 United States	Electronic Service		No	24-67
47	John	Farrell	jfarrell@ilsr.org	Institute for Local Self-Reliance		2720 E. 22nd St Institute for Local Self-Reliance Minneapolis MN, 55406 United States	Electronic Service		No	24-67
48	Sharon	Ferguson	sharon.ferguson@state.mn.us		Department of Commerce	85 7th Place E Ste 280 Saint Paul MN, 55101-2198 United States	Electronic Service		No	24-67
49	Terri	Finn	terri.goggleye@llojibwe.net			null null, null United States	Electronic Service		No	24-67
50	Christine	Fox	cfox@itasca-mantrap.com	Itasca-Mantrap Coop. Electric Assn.		PO Box 192 Park Rapids MN, 56470 United States	Electronic Service		No	24-67
51	Lucas	Franco	lfranco@liunagroc.com	LIUNA		81 Little Canada Rd E Little Canada MN, 55117 United States	Electronic Service		No	24-67
52	Gary	Frazer	gfrazer@mnchippewatribe.org	Minnesota Chippewa Tribe		PO Box 217 Cass Lake	Electronic Service		No	24-67

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						MN, 56633 United States				
53	Stacey	Fujii	sfujii@grenergy.com	Great River Energy		12300 Elm Creek Boulevard Maple Grove MN, 55369-4718 United States	Electronic Service		No	24-67
54	Edward	Garvey	garveyed@aol.com	Residence		32 Lawton St Saint Paul MN, 55102 United States	Electronic Service		No	24-67
55	Shannon	Geshick	shannon.geshick@state.mn.us	Minnesota Indian Affairs Council (MIAC)		null null, null United States	Electronic Service		No	24-67
56	Jeffrey	Haase	jhaase@grenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	24-67
57	Hal	Halpern	halhalpern@clpower.com	Cooperative Light & Power		1554 Hwy 2 P0 Box 69 Two Harbors MN, 55616 United States	Electronic Service		No	24-67
58	Jeremy	Hamilton	jhamilton@uppersiouxcommunity-nsn.gov	Upper Sioux Community		Upper Sioux Community PO Box 147 Granite Falls MN, 56241 United States	Electronic Service		No	24-67
59	David A.	Hansen	hansen@federatedrea.coop	Federated Rural Electric Association		77100 U.S. Highway 71 PO Box 69 Jackson MN, 56143 United States	Electronic Service		No	24-67
60	Amy	Hastings	amyh@uppersiouxcommunity-nsn.gov	Upper Sioux Community		5722 Travers Lane PO Box 147 Granite Falls MN, 56241 United States	Electronic Service		No	24-67
61	Erik	Hatlestad	erik@cureriver.org			117 1st St Montevideo MN, 56265 United States	Electronic Service		No	24-67
62	Adam	Heinen	aheinen@dakotaelectric.com	Dakota Electric Association		4300 220th St W Farmington MN, 55024 United States	Electronic Service		No	24-67
63	Kristin	Henry	kristin.henry@sierraclub.org	Sierra Club		2101 Webster St Ste 1300 Oakland CA, 94612 United States	Electronic Service		No	24-67
64	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	24-67
65	Ronald	Horman	rhorman@redwoodelectric.com	Redwood Electric Cooperative		60 Pine Street Clements MN, 56224 United States	Electronic Service		No	24-67
66	Frank	Hornstein	frank.hornstein@minneapolismn.gov	City of Minneapolis		350 South 5th Street Minneapolis MN, 55415 United States	Electronic Service		No	24-67

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
67	Robbie	Howe	robbie.howe@llojibwe.net	Leech Lake Band of Ojibwe		190 Sailstar Drive NW Cass Lake MN, 56633 United States	Electronic Service		No	24-67
68	John	Ihle	ljihle@rrt.net	PlainStates Energy LLC		27451 S Hwy 34 Barnesville MN, 56514 United States	Electronic Service		No	24-67
69	Annie	Jackson	cheryl.jackson@whiteearth-nsn.gov	White Earth Nation		White Earth Tribal Headquarters 35500 Eagle View Road Ogemo MN, 56569 United States	Electronic Service		No	24-67
70	Faron	Jackson, Sr.	faron.jackson@llojibwe.net			190 Sailstar Drive NW Cass Lake MN, 56633 United States	Electronic Service		No	24-67
71	Justin	Jahnz	justin.jahnz@ecemn.com	East Central Energy		412 Main Ave N Braham MN, 55006 United States	Electronic Service		No	24-67
72	Alan	Jenkins	aj@jenkinsatlaw.com	Jenkins at Law		2950 Yellowtail Ave. Marathon FL, 33050 United States	Electronic Service		No	24-67
73	Kevin	Jensvold	kevinj@uppersiouxcommunity-nsn.gov	Upper Sioux Community		PO Box 147 Granite Falls MN, 56241-0147 United States	Electronic Service		No	24-67
74	Annette	Johnson	annette.johnson@redlakenation.org	Red Lake Nation		15484 Migizi Drive Red Lake MN, 56671 United States	Electronic Service		No	24-67
75	Richard	Johnson	rickjohnson@cozen.com	Cozen O'Connor		150 S. 5th Street Suite 1200 Minneapolis MN, 55402 United States	Electronic Service		No	24-67
76	Sarah	Johnson Phillips	sjphillips@stoel.com	Stoel Rives LLP		33 South Sixth Street Suite 4200 Minneapolis MN, 55402 United States	Electronic Service		No	24-67
77	Mark	Kaminski	mark.kaminski@gsa.gov	General Services Administration		1800 F Street NW Washington DC, 20405 United States	Electronic Service		No	24-67
78	Veda	Kanitz	vmkanitz@gmail.com			null null, null United States	Electronic Service		No	24-67
79	Jenny	Kartes	jkartes@arrowhead.coop	Arrowhead Electric Cooperative, Inc.(P)		PO Box 39 5401 W Hwy 61 Lutsen MN, 55612 United States	Electronic Service		No	24-67
80	David	Kempf	dkempf@grenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	24-67

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
81	William	Kenworthy	will@votesolar.org			1 South Dearborn St Ste 2000 Chicago IL, 60603 United States	Electronic Service		No	24-67
82	Bobby	King	bking@solarunitedneighbors.org	Solar United Neighbors		3140 43rd Ave S Minneapolis MN, 55406 United States	Electronic Service		No	24-67
83	Therese	LaCanne	tlacanne@greenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	24-67
84	Matthew	Lacey	mlacey@greenergy.com	Great River Energy		12300 Elm Creek Boulevard Maple Grove MN, 55369-4718 United States	Electronic Service		No	24-67
85	Arthur	LaRose	arthur.larose@llojibwe.net	Leech Lake Band of Ojibwe		190 Sailstar Drive NW Cass Lake MN, 56633 United States	Electronic Service		No	24-67
86	Robert L	Larsen	robert.larsen@lowersioux.com	Lower Sioux Indian Community		PO Box 308 39527 Reservation Highway 1 Morton MN, 56270 United States	Electronic Service		No	24-67
87	Mark	Larson	mlarson@meeker.coop	Meeker Coop Light & Power Assn		1725 Highway 12 E Ste 100 Litchfield MN, 55355 United States	Electronic Service		No	24-67
88	Michelle	Larson	michelle@redwingchamber.com	Red Wing Area Chamber of Commerce		439 Main Street Red Wing, MN Bay Point Park MN, 55066 United States	Electronic Service		No	24-67
89	Dan	Leshner	dlesher@greenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	24-67
90	Michelle	Lommel	mlommel@greenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	24-67
91	Kavita	Maini	kmaini@wi.rr.com	KM Energy Consulting, LLC		961 N Lost Woods Rd Oconomowoc WI, 53066 United States	Electronic Service		No	24-67
92	Christine	Marquis	regulatory.records@xcelenergy.com	Xcel Energy		414 Nicollet Mall MN1180-07-MCA Minneapolis MN, 55401 United States	Electronic Service		No	24-67
93	Shena	Matrious	shena.matrious@millelacsband.com	Mille Lacs Band of Ojibwe		43408 Oodena Drive Onamia MN, 56349 United States	Electronic Service		No	24-67

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
94	April	McCormick	aprilm@grandportage.com	Grand Portage Band of Lake Superior Chippewa		PO Box 428 Grand Portage MN, 55605 United States	Electronic Service		No	24-67
95	Ronald	Meier	rmeier@mcleodcoop.com	Mcleod Cooperative Power		3515 11th St East Glencoe MN, 55336 United States	Electronic Service		No	24-67
96	Peder	Mewis	pmewis@cleangridalliance.org	Clean Grid Alliance		570 Asbury St. St. Paul MN, 55104 United States	Electronic Service		No	24-67
97	Valentina	Mgeni	valentina.mgeni@piic.org	Prairie Island Indian Community		Prairie Island Indian Community 5636 Sturgeon Lake Road Welch MN, 55089 United States	Electronic Service		No	24-67
98	Cole W.	Miller	cole.miller@shakopeedakota.org	Shakopee Mdewakanton Sioux Community		Shakopee Mdewakanton Sioux Community 2330 Sioux Trail NW Prior Lake MN, 55372 United States	Electronic Service		No	24-67
99	Sarah	Mooradian	sarah@curemn.org	CURE		117 South 1st Street Montevideo MN, 56265 United States	Electronic Service		No	24-67
100	Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP		33 South Sixth St Ste 4200 Minneapolis MN, 55402 United States	Electronic Service		No	24-67
101	Travis	Morrison	travis.morrison@boisforte-nsn.gov	Bois Forte Band of Chippewa		Bois Forte Tribal Government 5344 Lakeshore Drive Nett Lake MN, 55772 United States	Electronic Service		No	24-67
102	David	Morrison, Sr.	david.morrison@boisforte-nsn.gov	Bois Forte Band of Chippewa		Bois Forte Tribal Government 5344 Lakeshore Drive Nett Lake MN, 55772 United States	Electronic Service		No	24-67
103	Evan	Mulholland	emulholland@mncenter.org	Minnesota Center for Environmental Advocacy		1919 University Ave W Ste 515 Saint Paul MN, 55101 United States	Electronic Service		No	24-67
104	Sonny	Myers	smyers@1854treatyauthority.org	1854 Treaty Authority		4428 Haines Rd Duluth MN, 55811-1524 United States	Electronic Service		No	24-67

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
105	Pouya	Najmaie	najm0001@gmail.com	Cooperative Energy Futures		3416 16th Ave S Minneapolis MN, 55407 United States	Electronic Service		No	24-67
106	Carl	Nelson	cnelson@mncee.org	Center for Energy and Environment		212 3rd Ave N Ste 560 Minneapolis MN, 55401 United States	Electronic Service		No	24-67
107	Deb	Nelson	dnelson@greenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	24-67
108	David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency		220 South Sixth Street Suite 1300 Minneapolis MN, 55402 United States	Electronic Service		No	24-67
109	Duane	Ninneman	duane@cureriver.org	Clean Up the River Environment		117 South 1st St Montevideo MN, 56265 United States	Electronic Service		No	24-67
110	Logan	O'Grady	logrady@mnseia.org	Minnesota Solar Energy Industries Association		2288 University Ave W St. Paul MN, 55114 United States	Electronic Service		No	24-67
111	Joseph	OBrien	joey.obrien@lowersioux.com			39527 Highway 1 Morton MN, 56270 United States	Electronic Service		No	24-67
112	Carol A.	Overland	overland@legalelectric.org	Legalelectric - Overland Law Office		1110 West Avenue Red Wing MN, 55066 United States	Electronic Service		No	24-67
113	Gregory	Padden	gpadden@greenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	24-67
114	Jessica	Palmer Denig	jessica.palmer-denig@state.mn.us		Office of Administrative Hearings	600 Robert St N PO Box 64620 St. Paul MN, 55164 United States	Electronic Service		Yes	24-67
115	Marsha	Parlow	mparlow@greenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	24-67
116	Priti	Patel	ppatel@greenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369-4718 United States	Electronic Service		No	24-67
117	Earl	Pendleton	earl.pendleton@lowersioux.com	Lower Sioux Indian Community		39527 Highway 1 Morton MN, 56270 United States	Electronic Service		No	24-67
118	Gordon	Pietsch	gpietsch@greenergy.com	Great River Energy		12300 Elm Creek Blvd. Maple Grove MN, 55369-	Electronic Service		No	24-67

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						4718 United States				
119	Joe	Plumer	joe.plumer@redlakenation.org	Red Lake Nation		15484 Migizi Drive Red Lake MN, 56671 United States	Electronic Service		No	24-67
120	Kevin	Pranis	kpranis@liunagroc.com	Laborers' District Council of MN and ND		81 E Little Canada Road St. Paul MN, 55117 United States	Electronic Service		No	24-67
121	Robert	Prescott	bob.prescott@lowersioux.com	Lower Sioux Indian Community		39527 Highway 1 Morton MN, 56270 United States	Electronic Service		No	24-67
122	Jody	Puddu	jody.puddu@piic.org	Prairie Island Indian Community		5636 Sturgeon Lake Rd Welch MN, 55089 United States	Electronic Service		No	24-67
123	Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	1400 BRM Tower 445 Minnesota St St. Paul MN, 55101-2131 United States	Electronic Service		Yes	24-67
124	Kevin	Reuther	kreuther@mncenter.org	MN Center for Environmental Advocacy		26 E Exchange St, Ste 206 St. Paul MN, 55101-1667 United States	Electronic Service		No	24-67
125	Stephan	Roos	stephan.roos@state.mn.us		Minnesota Department of Agriculture	625 Robert St N Saint Paul MN, 55155-2538 United States	Electronic Service		No	24-67
126	Alan	Roy	alan.roy@whiteearth-nsn.gov	White Earth Nation		White Earth Tribal Headquarters 35500 Eagle View Road Ogema MN, 56569 United States	Electronic Service		No	24-67
127	Bill	Rudnicki	bill.rudnicki@shakopeedakota.org	Shakopee Mdewakanton Sioux Community		Shakopee Mdewakanton Sioux Community 2330 Sioux Trail NW Prior Lake MN, 55372 United States	Electronic Service		No	24-67
128	Nathaniel	Runke	nrunke@local49.org			611 28th St. NW Rochester MN, 55901 United States	Electronic Service		No	24-67
129	Zachary	Ruzycki	zruzycki@grenergy.com	Great River Energy		12300 Elm Creek Boulevard Maple Grove MN, 55369 United States	Electronic Service		No	24-67
130	Miranda	Sam	miranda.sam@lowersioux.com	Lower Sioux Indian Community		39527 Reservation Highway 1 PO Box 308 Morton MN,	Electronic Service		No	24-67

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						56270 United States				
131	Adam	Savariego	adams@uppersiouxcommunity-nsn.gov	Upper Sioux Community		5722 Travers Lane PO Box 147 Granite Falls MN, 56241 United States	Electronic Service		No	24-67
132	Ronald J.	Schwartau	rschwartau@noblesce.com	Nobles Electric Cooperative		22636 U.S. Hwy. 59 Worthington MN, 56187 United States	Electronic Service		No	24-67
133	Jessie	Seim	jessie.seim@piic.org	Prairie Island Indian Community		5636 Sturgeon Lake Rd Welch MN, 55089 United States	Electronic Service		No	24-67
134	Darrell	Seki, Sr.	dseki@redlakenation.org			15484 Migizi Drive Red Lake MN, 56671 United States	Electronic Service		No	24-67
135	Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates		7400 Lyndale Ave S Ste 190 Richfield MN, 55423 United States	Electronic Service		Yes	24-67
136	Joel	Smith	jsmith@mnchippewatribe.org	Minnesota Chippewa Tribe		PO Box 217 Cass Lake MN, 56633 United States	Electronic Service		No	24-67
137	Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.		76 W Kellogg Blvd St. Paul MN, 55102 United States	Electronic Service		No	24-67
138	Nizhoni	Smith	nizhoni.smith@lowersioux.com	Lower Sioux Indian Community		PO Box 308 39527 Reservation Highway 1 Morton MN, 56270 United States	Electronic Service		No	24-67
139	Roger	Smith, Sr.	rogermsmithsr@fdlrez.com			1720 Big Lake Road Cloquet MN, 55720 United States	Electronic Service		No	24-67
140	Beth	Soholt	bsoholt@cleangridalliance.org	Clean Grid Alliance		570 Asbury Street Suite 201 St. Paul MN, 55104 United States	Electronic Service		No	24-67
141	Marie	Spry	mariespry@grandportage.com			PO Box 428 Grand Portage MN, 55605 United States	Electronic Service		No	24-67
142	Michael	Stalberger	michael.stalberger@blueearthcountymn.gov	Blue Earth County		410 S 5th Street Mankato MN, 56001 United States	Electronic Service		No	24-67
143	LeRoy	Staples Fairbanks III	leroy.fairbanks@llojibwe.net	Leech Lake Band of Ojibwe		190 Sailstar Drive NW Cass Lake MN, 56633 United States	Electronic Service		No	24-67
144	Byron E.	Starns	byron.starns@stinson.com	STINSON LLP		50 S 6th St Ste 2600 Minneapolis	Electronic Service		No	24-67

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						MN, 55402 United States				
145	Mark	Strohfus	mstrohfus@greenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	24-67
146	Samuel	Strong	sam.strong@redlakenation.org	Red Lake Nation		15484 Migizi Drive Red Lake MN, 56671 United States	Electronic Service		No	24-67
147	Timothy	Sullivan	tsullivan@whe.org	Wright Hennepin Coop. Electric Assn.		6800 Electric Drive PO Box 330 Rockford MN, 55373 United States	Electronic Service		No	24-67
148	David	Sunderman	daves@benco.org	BENCO (DUPLICATE)		PO Box 8 Mankato MN, 56002-0008 United States	Electronic Service		No	24-67
149	Camille	Tanhoff	kamip@uppersiouxcommunity-nsn.gov	Upper Sioux Community		5722 Travers Lane PO BOX 147 Granite Falls MN, 56241 United States	Electronic Service		No	24-67
150	Tim	Thompson	tthompson@lrec.coop	Lake Region Electric Cooperative		PO Box 643 1401 South Broadway Pelican Rapids MN, 56572 United States	Electronic Service		No	24-67
151	Geoffrey	Tolley	geoff.tolley@gmail.com			855 Stanley Road Two Harbors MN, 55616-1176 United States	Electronic Service		No	24-67
152	Caralyn	Trutna	carrie@uppersiouxcommunity-nsn.gov	Upper Sioux Community		Upper Sioux Community P.O. Box 147 Granite Falls MN, 55372 United States	Electronic Service		No	24-67
153	Jackie	Van Norman	jvannorman@greenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	24-67
154	Sam	Villella	sdvillella@gmail.com			10534 Alamo Street NE Blaine MN, 55449 United States	Electronic Service		No	24-67
155	Carla	Vita	carla.vita@state.mn.us	MN DEED		Great Northern Building 12th Floor 180 East Fifth Street St. Paul MN, 55101 United States	Electronic Service		No	24-67
156	Amelia	Vohs	avohs@mncenter.org	Minnesota Center for Environmental Advocacy		1919 University Avenue West Suite 515 St. Paul MN, 55104 United States	Electronic Service		No	24-67

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
157	Trent	Waite	twaite@grenergy.com			null null, null United States	Electronic Service		No	24-67
158	Heather	Westra	heather.westra@piic.org	Prairie Island Indian Community		5636 Sturgeon Lake Rd Welch MN, 55089 United States	Electronic Service		No	24-67
159	Steve	White	steve.white@llojibwe.net	Leech Lake Band of Ojibwe		190 Sailstar Drive NW Cass Lake MN, 56633 United States	Electronic Service		No	24-67
160	Cody	Whitebear	cody.whitebear@piic.org	Prairie Island Indian Community		5636 Sturgeon Lake Road Welch MN, 55089 United States	Electronic Service		No	24-67
161	John	Williams	jwilliams@grenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	24-67
162	Virgil	Wind	virgil.wind@millelacsband.com	Mille Lacs Band of Ojibwe		43408 Oodena Drive Onamia MN, 56359 United States	Electronic Service		No	24-67
163	Joseph	Windler	jwindler@winthrop.com	Winthrop & Weinstine		225 South Sixth Street, Suite 3500 Minneapolis MN, 55402 United States	Electronic Service		No	24-67
164	Laurie	York	laurie.york@whiteearth-nsn.gov	White Earth Reservation Business Committee		PO Box 418 White Earth MN, 56591 United States	Electronic Service		No	24-67
165	Curtis	Zaun	czaun@mnseia.org	MnSEIA		PO Box 8141 Saint Paul MN, 55108 United States	Electronic Service		No	24-67
166	Kurt	Zimmerman	kwz@ibew160.org	Local Union #160, IBEW		2909 Anthony Ln St Anthony Village MN, 55418-3238 United States	Electronic Service		No	24-67
167	Patrick	Zomer	pzomer@cozen.com	Cozen O'Connor		150 S. 5th Street, #1200 Minneapolis MN, 55402 United States	Electronic Service		No	24-67