



December 10, 2025

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

RE: Initial Comments of Center for Energy and Environment in the Matter of Northern States Power Company, dba Xcel Energy, Petition for Approval of Capacity*Connect, a Distributed Capacity Procurement (DCP) Program

Docket Number: E002/M-25-378

Ms. Bergman,

Center for Energy and Environment (“CEE”) appreciates the opportunity to provide Initial Comments in response to the Minnesota Public Utilities Commission (“Commission”) Notice of Comment Period issued on October 16, 2025, regarding whether the Commission should approve Xcel Energy’s proposed implementation of Phase 2 of its Capacity*Connect program.

In the comments below, CEE supports approval of Xcel Energy’s proposed Distributed Energy Resources Management System budget, roadmap, and proposed use cases, and offers general support for the full Capacity*Connect proposal. CEE looks forward to further discussions with parties as the proceeding progresses and intends to provide final recommendations in reply or supplemental comments.

Please do not hesitate to contact me with any questions.

Sincerely,

/s/ Will Nissen
Director of Policy
Center for Energy and Environment
wnissen@mncee.org

Petition Summary

On October 3, 2025, Xcel Energy (“Xcel” or “Company”) filed a petition for approval of Phase 2 of the Company’s Capacity*Connect (“C*C”) program proposal, which encompasses deployment of approximately 50-200 MW of Xcel-owned and operated front-of-the-meter (“FTM”) battery energy storage systems (“BESS”) by the end of 2028. The proposal also includes a summary and roadmap for deployment of different stages and applications of the Company’s Distributed Energy Resource Management System (“DERMS”).

Xcel provided an estimated budget for the proposal ranging from approximately \$152 million for 50 MW of BESS deployment to \$430 million for 200 MW of BESS deployment through 2028. Of those totals, Xcel proposed a \$2.9 million budget to implement a limited Grid DERMS application through the program. The Company proposed to recover costs from the Capacity*Connect program through the Renewable Energy Standard (“RES”) Rider.

Capacity*Connect Proposal

Center for Energy and Environment (“CEE”) is a nonprofit organization whose core mission is to discover and deploy the most effective energy solutions that strengthen the economy and improve the environment, with a vision toward a healthy, carbon-neutral economy that works for all people. CEE approaches the Capacity*Connect program from the lens of identifying and implementing grid management solutions that cost-effectively integrate distributed energy resources (“DER”) into utility operations in a way that optimizes value and mitigates costs on the system.

CEE broadly supports the integration of BESS into utility resource mixes and operations as another tool to safely, reliably, and affordably manage the grid while enabling broader integration of DERs and reducing emissions. Notably, CEE views Phase 2 of the Capacity*Connect proposal from Xcel as one application of BESS on the Company’s system: namely, a front-of-the-meter utility-owned and operated resource. To CEE, the goal of the Capacity*Connect proposal is to optimize the application of this specific resource, which largely entails deployment of an array of 1-3 MW BESS across the distribution system, to realize benefits to the utility system and gain learnings for future scaling of the program. As stated by Xcel:

BESS strategically deployed on the distribution system can provide system value across a range of use cases when integrated with Company planning, engineering, and operational functions. When these assets are sited, installed, and dispatched in a coordinated manner, they have the potential to meet customer needs and benefit the grid. Realizing the full value of C*C depends not only on the underlying assets themselves, but also on the ability to strategically site and effectively integrate them into the Company’s grid planning and operations. Absent strategic deployment in target locations, coordinated control

and dispatch, and total visibility, non-utility-owned resources could deliver, at best, a portion of the anticipated system and customer benefits.¹

CEE finds this argument compelling. This is the first time a utility in Minnesota has proposed to place medium-sized BESS on the distribution system to manage distribution assets and loads, incorporate DERs into system planning and operations, and realize benefits from coordination between the bulk system and distribution system. It is critical to ensure that this first step is implemented cost-effectively and that the benefits to the system and customers are realized as Xcel pursues state policy goals. In a broad sense, the C*C proposal largely aligns with CEE's general philosophy and approach of piloting, learning from, and implementing new programs, technologies, and approaches through central utility planning in a regulated structure with accountable outcomes.

CEE looks forward to continued engagement with parties on the full Capacity*Connect proposal as this proceeding progresses.

DERMS Implementation

The Minnesota Public Utilities Commission ("Commission") Order issued September 16, 2024, in Xcel's 2023 Integrated Distribution Plan required the Company to file a detailed roadmap for DERMS deployment that addresses a list of questions intended to ensure steady and transparent implementation of DERMS due to the "crucial role that DERMS will likely play in the future of the distribution system."² In the Company's C*C proposal filing, and in its 2025 Integrated Distribution Plan filed October 31, 2025, in Docket No. E002/M-25-142, Xcel provided a DERMS roadmap that addressed the questions required by the Commission.

CEE notes that Xcel is asking for budget approval of \$2.9 million for just the limited Grid DERMS implementation in its C*C proposal that would apply to the C*C program, flexible interconnection, and flexible energization as described in the filing.³ CEE supports approval of the budget and use cases for the limited Grid DERMS implementation proposal as indicated in Question 3 of the Commission's Notice of Comment Period issued October 16, 2025.

In addition, CEE appreciates and supports Xcel's comprehensive, methodical, and phased approach to implementing DERMS at scale through its planned roadmap. CEE asserts that Xcel's broader roadmap as proposed will create operational flexibility to generate multiple value streams as distributed energy resources expand on the Company's system. In addition, key components of the roadmap are supported by a report issued in March 2025 by the Smart

¹ Request for Approval of Capacity*Connect. Filed by Xcel Energy on October 3, 2025, in Docket No. E002/M-25-378. Page 42.

² *Order Accepting 2023 Integrated Distribution Plan and Modifying Reporting Requirements*. Issued by the Minnesota Public Utilities Commission on September 16, 2024, in Docket No. E002/M-23-452. Page 18.

³ Request for Approval of Capacity*Connect. Filed by Xcel Energy on October 3, 2025, in Docket No. E002/M-25-378. Attachment D, page 12.

Electric Power Alliance (SEPA) titled “Decoding DERMS: Options for the Future of DER Management” as discussed below.⁴

Implementation Flexibility

Both Xcel’s DERMS roadmap and the SEPA report highlight the different types of DERMS that utilities can acquire and implement. Xcel’s roadmap labels and describes these as follows:

- Grid DERMS: intended for managing FOM resources for monitoring, control, and coordination of DERs. Limited applications include flexible interconnection to potentially reduce interconnection costs and timelines for customers, flexible energization to manage load during capacity-constrained periods, and deployment of BESS assets through Capacity*Connect.⁵
- Aggregator DERMS: intended for scaling and integration of a broad range of behind-the-meter (BTM) resources like solar and demand response assets and providing improved visibility and control for peak load management and other grid services.⁶
- Enterprise DERMS: intended to integrate Grid DERMS and Aggregator DERMS with other utility systems and operations to support efficient grid operation and asset utilization, enhance grid resiliency and reliability, and better enable DER participation in energy markets.⁷

Each of these DERMS components is intended to address specific challenges at specific scales through a specific application, culminating in the integration of the tools into a new comprehensive system. Importantly, Xcel has proposed implementing these in phases over time, an approach supported by a hypothetical example of two utilities in the SEPA report.⁸

In the example, both utilities set out to use DERs to address anticipated system capacity challenges and identify the need for DERMS to support that effort. The first utility tries to develop, propose, and implement a complete DERMS system all at once, going through a years-long process only to find there is no “one size fits all” approach for effectively managing all DERs at scale. The second utility identifies a specific DER opportunity through thermostat and battery demand response programs, which leads to development of a tailored DERMS platform,

⁴ Decoding DERMS: Options for the Future of DER Management. Published in March 2025 by the Smart Electric Power Alliance. <https://sepapower.org/resource/decoding-derms-options-for-the-future-of-der-management/>. SEPA is a 501(c)3 nonprofit organization with over 1,000 members whose mission is to accelerate the electric power industry’s transformation to a modern energy future through education, research, standards, and collaboration.

⁵ Request for Approval of Capacity*Connect. Filed by Xcel Energy on October 3, 2025, in Docket No. E002/M-25-378. Attachment D, page 12.

⁶ *Id.* Attachment D, pages 12-13.

⁷ *Id.* Attachment D, page 2.

⁸ SEPA Report. Page 21.

which is then scaled to meet broader system needs over time. In the end, the second utility has a comprehensive and sophisticated DERMS solution while the first utility is left with nothing.

As stated in the report, “by adopting a pragmatic, step-by-step approach to DERMS implementation, utilities can navigate the complexities of the evolving energy landscape while meeting the needs of regulators and customers.”⁹ Xcel has adopted a similar approach as described in the proposal:

The Company has adopted an incremental implementation strategy for DERMS. Over time, this experience will support the development of more advanced capabilities and enable broader integration of DERMS technologies and organizational maturity. The gradual rollout also ensures that the adoption of a new, integrated approach, combining technology, people, processes, and organizational efficiencies, is implemented in a way that maintains the safety, reliability, and stability of the electric grid. This approach reflects a meaningful shift in how the company manages its distribution systems, moving toward a more integrated model. By progressing deliberately, the company can mitigate operational risks while positioning itself to fully capitalize on DERs as the programs continue to evolve and mature.¹⁰

This gradual and flexible approach is even more important given changing policies and markets around demand response and other DERs. For example, the Midcontinent Independent System Operator (MISO) is currently changing a variety of rules related to load-modifying resources like demand response and BTM energy storage for both the 2026/2027 and 2028/2029 Planning Years.¹¹ These changing rules are in addition to MISO’s ongoing development and implementation of Distributed Energy Resource Aggregator tariffs in response to Federal Energy Regulatory Commission (FERC) Order 2222.¹² As these proposed changes are reviewed and approved by FERC, DERMS capabilities that allow for flexible interaction with MISO energy and capacity markets will be critical to enabling DER value streams.

In addition, specific DER technologies, capabilities, and applications will also continue to evolve. For example, growing adoption of air source heat pumps (ASHPs) will continue driving cooling savings during utility summer peaks and increase electric loads during utility winter peaks. In instances where ASHPs are combined with a backup heating system like a natural gas furnace, known as dual fuel applications, dynamic utility-led load control of the electric ASHP system by

⁹ SEPA Report. Page 21.

¹⁰ Request for Approval of Capacity*Connect. Filed by Xcel Energy on October 3, 2025, in Docket No. E002/M-25-378. Page 28.

¹¹ LMR Enhancements and Testing Provisions, RASC-2019-9. Presentation from MISO given July 9, 2025.

[https://cdn.misoenergy.org/20250709%20RASC%20Item%2007b-c%20LMR%20Enhancements%20Near%20Term%20Filings%20\(RASC-2019-9\)706009.pdf](https://cdn.misoenergy.org/20250709%20RASC%20Item%2007b-c%20LMR%20Enhancements%20Near%20Term%20Filings%20(RASC-2019-9)706009.pdf)

¹² Dashboard of MISO filings and activities related to Distributed Energy Resources – FERC Order 2222 Compliance. <https://www.misoenergy.org/engage/MISO-Dashboard/distributed-energy-resources/>

switching to the gas furnace during constrained peak times could provide valuable grid management opportunities during winter peak events. Implementing a DERMS system that can manage this resource at scale will give the Company another tool to optimize value in an evolving energy transition.

Enabling Multiple Value Streams

Utilities have different system characteristics and market interactions that create unique opportunities for DERs to solve challenges and provide a variety of value streams. It is unlikely that each utility in Minnesota will capture all of these value streams at once, but a flexible DERMS platform can optimize the right DERs at the right time and place to deliver value to the utility and its customers.

The SEPA report characterizes some of the value streams resulting from DERMS implementation in the chart below. The report also emphasizes that utilities should quantify the benefits from DERMS investments, and that “an effective DERMS implementation strategy is to build incrementally based on more easily quantifiable outcomes, while working to quantify some of the more difficult ones.”¹³ As stated above, Xcel also filed its DERMS roadmap with its 2025 Integrated Distribution Plan, so questions about reporting on the benefits of DERMS investments may be better addressed in that broader distribution system context.

Table 1. Value Streams Resulting from DERMS

Quantifiable		Less Quantifiable	
<ul style="list-style-type: none"> ▪ Avoided generation capacity requirements ▪ Asset management (e.g., preventing overload) ▪ Line loss reduction ▪ Voltage support/Ancillary services 	<ul style="list-style-type: none"> ▪ Frequency regulation ▪ Contingency reserve ▪ Energy arbitrage ▪ Generation capacity reduction 	<ul style="list-style-type: none"> ▪ Improved visibility and situational awareness of DERs on the grid ▪ Overall distribution deferral value for a DER program 	<ul style="list-style-type: none"> ▪ Enhanced decision support tools ▪ More accurate forecasting and optimization to inform real-time operations

Source: SEPA (2025).

In the context of the C*C program proposal, Xcel highlights this important flexibility in enabling different value streams as opportunities arise. In its proposal filing, the Company states the following regarding benefits tied to MISO capacity and resource adequacy:

We clarify that in order to capture the value of the capacity/resource adequacy benefit, we would need additional investment in DERMS – beyond the planned limited deployment – and related people and processes. In addition, some mutual exclusivity may be created with regard to capturing other benefit streams. For example, to the extent that the C*C assets may be dispatched for reliability reasons under MISO’s resource adequacy construct outside of the set energy schedule, this will likely result in reduced energy payments. Inversely, it

¹³ SEPA Report. Page 22.

may be necessary to reserve some of the battery capacity to be able to meet MISO's requirements to qualify for capacity payments/resource adequacy, at the expense of maximizing energy revenue. As noted, these tradeoffs between energy and capacity value will need to be analyzed and evaluated in more detail during the implementation phase of DCP. We will continue exploring capacity/resource adequacy options and tradeoffs as we get more information from MISO, work to enable coordination between the Company's control centers – including through Enterprise DERMS deployment, and as the market opportunities mature.¹⁴

In this example, flexible, methodical, and deliberate investments in DERMS will enable DERs like the C*C program to better meet the needs and opportunities presented in MISO capacity and energy markets.

As presented in the SEPA report, DERMS can enable these value streams through distribution system forecasting, operations planning, and scheduling to integrate DERs into broader utility system planning and management processes.¹⁵ In addition, DERMS can provide real-time operations capabilities through communications with grid operators about system-wide and locational load characteristics, directly dispatching DERs to shift load to reduce wholesale electricity costs, providing situational awareness of DER activities, and communicating with DER aggregators.¹⁶

Conclusion

CEE appreciates the opportunity to comment on Xcel's proposed Capacity*Connect program. As described in these comments, CEE supports approval of Xcel's proposed DERMS implementation budget and use cases and looks forward to discussions with parties on the full Capacity*Connect program proposal as this proceeding progresses. CEE plans to provide final recommendations to the Commission in reply or supplemental comments in this docket.

¹⁴ Request for Approval of Capacity*Connect. Filed by Xcel Energy on October 3, 2025, in Docket No. E002/M-25-378. Pages 36-37.

¹⁵ SEPA Report. Pages 18-19.

¹⁶ SEPA Report. Page 19.

AFFIDAVIT OF SERVICE

DOCKET NUMBER E002/M-25-378

I, Will Nissen, hereby certify that on this 10th day of December, 2025, I served Initial Comments for Center for Energy and Environment *In the Matter of Northern States Power Company, dba Xcel Energy, Petition for Approval of Capacity*Connect, a Distributed Capacity Procurement (DCP) Program* in Docket Number E002/M-25-378 on the following persons on the attached Service Lists by the preferred delivery method indicated.

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67	Michael	Fairbanks	michael.fairbanks@whiteearth-nsn.gov	White Earth Reservation Business Committee		PO Box 418 White Earth MN, 56591 United States	Electronic Service		No	M-25-378
68	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	M-25-378
69	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	M-25-378
70	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	M-25-378
71	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	M-25-378
72	Terri	Finn	terri.goggeye@llojibwe.net			null null, null United States	Electronic Service		No	M-25-378
73	Mike	Fiterman	mikefiterman@libertydiversified.com	Liberty Diversified International		5600 N Highway 169 Minneapolis MN, 55428-3096 United States	Electronic Service		No	M-25-378
74	Christine	Fox	cfox@itasca-mantrap.com	Itasca-Mantrap Coop. Electric Assn.		PO Box 192 Park Rapids MN, 56470 United States	Electronic Service		No	M-25-378
75	Lucas	Franco	lfranco@liunagro.com	LIUNA		81 Little Canada Rd E Little Canada MN, 55117 United States	Electronic Service		No	M-25-378
76	Gary	Frazer	gfrazier@mnchippewatribe.org	Minnesota Chippewa Tribe		PO Box 217 Cass Lake MN, 56633 United States	Electronic Service		No	M-25-378
77	Stacey	Fujii	sfujii@grenergy.com	Great River Energy		12300 Elm Creek Boulevard Maple Grove MN, 55369-4718 United States	Electronic Service		No	M-25-378
78	Edward	Garvey	garveyed@aol.com	Residence		32 Lawton St Saint Paul MN, 55102 United States	Electronic Service		No	M-25-378
79	Shannon	Geshick	shannon.geshick@state.mn.us	Minnesota Indian Affairs Council (MIAC)		null null, null United States	Electronic Service		No	M-25-378
80	Allen	Gleckner	gleckner@fresh-energy.org	Fresh Energy		408 St. Peter Street Ste 350 Saint Paul	Electronic Service		No	M-25-378

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						MN, 55102 United States				
81	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	M-25- 378
82	Jeffrey	Haase	jhaase@grenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	M-25- 378
83	Hal	Halpern	halhalpern@clpower.com	Cooperative Light & Power		1554 Hwy 2 PO Box 69 Two Harbors MN, 55616 United States	Electronic Service		No	M-25- 378
84	Jeremy	Hamilton	jhamilton@uppersiouxcommunity-nsn.gov	Upper SiouX Community		Upper SiouX Community PO Box 147 Granite Falls MN, 56241 United States	Electronic Service		No	M-25- 378
85	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	M-25- 378
86	Amy	Hastings	amyh@uppersiouxcommunity-nsn.gov	Upper SiouX Community		5722 Travers Lane PO Box 147 Granite Falls MN, 56241 United States	Electronic Service		No	M-25- 378
87	Erik	Hatlestad	erik@cureriver.org			117 1st St Montevideo MN, 56265 United States	Electronic Service		No	M-25- 378
88	Kim	Havey	kim.havey@minneapolismn.gov	City of Minneapolis		350 South 5th Street, Suite 315M Minneapolis MN, 55415 United States	Electronic Service		No	M-25- 378
89	Philip	Hayet	phayet@jkenn.com	J. Kennedy and Associates, Inc.		570 Colonial Park Drive Suite 305 Roswell GA, 30075-3770 United States	Electronic Service		No	M-25- 378
90	Adam	Heinen	aheinen@dakotaelectric.com	Dakota Electric Association		4300 220th St W Farmington MN, 55024 United States	Electronic Service		No	M-25- 378
91	Annete	Henkel	mui@mnuilityinvestors.org	Minnesota Utility Investors		413 Wacouta Street #230 St.Paul MN, 55101 United States	Electronic Service		No	M-25- 378
92	Kristin	Henry	kristin.henry@sierraclub.org	Sierra Club		2101 Webster St Ste 1300 Oakland CA, 94612 United States	Electronic Service		No	M-25- 378
93	Katherine	Hinderlie	katherine.hinderlie@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	445 Minnesota St Suite 1400 St. Paul MN, 55101-2134 United States	Electronic Service		No	M-25- 378
94	Michael	Hoppe	lu23@ibew23.org	Local Union 23, I.B.E.W.		445 Etna Street Ste. 61	Electronic Service		No	M-25- 378

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						St. Paul MN, 55106 United States				
95	Ronald	Horman	rhorman@redwoodelectric.com	Redwood Electric Cooperative		60 Pine Street Clements MN, 56224 United States	Electronic Service		No	M-25-378
96	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	M-25-378
97	Robbie	Howe	robbie.howe@llojibwe.net	Leech Lake Band of Ojibwe		190 Sailstar Drive NW Cass Lake MN, 56633 United States	Electronic Service		No	M-25-378
98	Dean	Hunter	dean.hunter@state.mn.us		Minnesota Department of Labor & Industry	443 Lafayette Rd N St. Paul MN, 55155-4341 United States	Electronic Service		No	M-25-378
99	John	Ihle	ljihle@rrt.net	PlainStates Energy LLC		27451 S Hwy 34 Barnesville MN, 56514 United States	Electronic Service		No	M-25-378
100	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	M-25-378
101	Faron	Jackson, Sr.	faron.jackson@llojibwe.net			190 Sailstar Drive NW Cass Lake MN, 56633 United States	Electronic Service		No	M-25-378
102	Justin	Jahnz	justin.jahnz@ecemn.com	East Central Energy		412 Main Ave N Braham MN, 55006 United States	Electronic Service		No	M-25-378
103	Alan	Jenkins	aj@jenkinsatlaw.com	Jenkins at Law		2950 Yellowtail Ave. Marathon FL, 33050 United States	Electronic Service		No	M-25-378
104	Kevin	Jensvold	kevinj@uppersiouxcommunity-nsn.gov	Upper Sioux Community		PO Box 147 Granite Falls MN, 56241-0147 United States	Electronic Service		No	M-25-378
105	Annette	Johnson	annette.johnson@redlakenation.org	Red Lake Nation		15484 Migizi Drive Red Lake MN, 56671 United States	Electronic Service		No	M-25-378
106	Richard	Johnson	rick.johnson@lawmoss.com	Moss & Barnett		150 S. 5th Street Suite 1200 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-378
107	Sarah	Johnson Phillips	sjphillips@stoel.com	Stoel Rives LLP		33 South Sixth Street Suite 4200 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-378
108	Mark	Kaminski	mark.kaminski@gsa.gov	General Services Administration		1800 F Street NW Washington	Electronic Service		No	M-25-378

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						DC, 20405 United States				
109	Veda	Kanitz	vmkanitz@gmail.com			null null, null United States	Electronic Service		No	M-25-378
110	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	M-25-378
111	David	Kempf	dkempf@greenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	M-25-378
112	William	Kenworthy	will@votesolar.org			1 South Dearborn St Ste 2000 Chicago IL, 60603 United States	Electronic Service		No	M-25-378
113	Samuel B.	Ketchum	sketchum@kennedy-graven.com	Kennedy & Graven, Chartered		150 S 5th St Ste 700 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-378
114	Bobby	King	bking@solarunitedneighbors.org	Solar United Neighbors		3140 43rd Ave S Minneapolis MN, 55406 United States	Electronic Service		No	M-25-378
115	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	M-25-378
116	Frank	Kohlasch	frank.kohlasch@state.mn.us		Minnesota Pollution Control Agency	520 Lafayette Rd N. St. Paul MN, 55155 United States	Electronic Service		No	M-25-378
117	Brian	Kolbinger	brian@beckertownship.org	Becker Township Board		PO Box 248 12165 Hancock St Becker MN, 55308 United States	Electronic Service		No	M-25-378
118	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	M-25-378
119	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	M-25-378
120	Kay	Kuhlmann	teri.swanson@ci.red-wing.mn.us	City Of Red Wing		315 West Fourth Street Red Wing MN, 55066 United States	Electronic Service		No	M-25-378
121	Brenda	Kyle	bkyle@stpaulchamber.com	St. Paul Area Chamber of Commerce		401 N Robert Street Suite 150 St Paul MN, 55101 United States	Electronic Service		No	M-25-378
122	Therese	LaCanne	tlacanne@greenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	M-25-378
123	Matthew	Lacey	mlacey@greenergy.com	Great River Energy		12300 Elm Creek Boulevard	Electronic Service		No	M-25-378

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						Maple Grove MN, 55369-4718 United States				
124	Carmel	Laney	carmel.laney@stoel.com	Stoel Rives LLP		33 South Sixth Street Suite 4200 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-378
125	Arthur	LaRose	arthur.larose@llojibwe.net	Leech Lake Band of Ojibwe		190 Sailstar Drive NW Cass Lake MN, 56633 United States	Electronic Service		No	M-25-378
126	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	M-25-378
127	Mark	Larson	mlarson@meeker.coop	Meeker Coop Light & Power Assn		1725 Highway 12 E Ste 100 Litchfield MN, 55355 United States	Electronic Service		No	M-25-378
128	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	M-25-378
129	Peder	Larson	plarson@larkinhoffman.com	Larkin Hoffman Daly & Lindgren, Ltd.		8300 Norman Center Drive Suite 1000 Bloomington MN, 55437 United States	Electronic Service		No	M-25-378
130	Amber	Lee	amber.lee@stoel.com	Stoel Rives LLP		33 S. 6th Street Suite 4200 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-378
131	Rachel	Leonard	rachel.leonard@ci.monticello.mn.us	City of Monticello		505 Walnut St Ste 1 Monticello MN, 55362 United States	Electronic Service		No	M-25-378
132	Dan	Leshner	dlesher@greenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	M-25-378
133	Annie	Levenson Falk	annielf@cubminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota Street, Suite W1360 St. Paul MN, 55101 United States	Electronic Service		No	M-25-378
134	Michelle	Lommel	mlommel@greenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	M-25-378
135	Alice	Madden	alice@communitypowermn.org	Community Power		2720 E 22nd St Minneapolis MN, 55406 United States	Electronic Service		No	M-25-378
136	Kavita	Maini	kmaini@wi.rr.com	KM Energy Consulting, LLC		961 N Lost Woods Rd Oconomowoc WI, 53066 United States	Electronic Service		No	M-25-378

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
137	Christine	Marquis	regulatory.records@xcelenergy.com	Xcel Energy		414 Nicollet Mall MN1180-07-MCA Minneapolis MN, 55401 United States	Electronic Service		Yes	M-25-378
138	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	M-25-378
139	Emily	Marshall	emarshall@lourismarshall.com	Miller O'Brien Jensen, PA		120 S. 6th Street Suite 2400 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-378
140	Katherine	Marshall	katie.marshall@lawmoss.com	Moss & Barnett		150 S 5th St Ste 1200 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-378
141	Mary	Martinka	mary.a.martinka@xcelenergy.com	Xcel Energy Inc		414 Nicollet Mall 7th Floor Minneapolis MN, 55401 United States	Electronic Service		No	M-25-378
142	Gregg	Mast	gmast@cleanenergyeconomymn.org	Clean Energy Economy Minnesota		4808 10th Avenue S Minneapolis MN, 55417 United States	Electronic Service		No	M-25-378
143	Shena	Matrious	shena.matrious@millelacsband.com	Mille Lacs Band of Ojibwe		43408 Oodena Drive Onamia MN, 56349 United States	Electronic Service		No	M-25-378
144	Daryl	Maxwell	dmaxwell@hydro.mb.ca	Manitoba Hydro		360 Portage Ave FL 16 PO Box 815, Station Main Winnipeg MB, R3C 2P4 Canada	Electronic Service		No	M-25-378
145	Erica	McConnell	emcconnell@elpc.org	Environmental Law & Policy Center		35 E. Wacker Drive, Suite 1600 Chicago IL, 60601 United States	Electronic Service		No	M-25-378
146	April	McCormick	aprilm@grandportage.com	Grand Portage Band of Lake Superior Chippewa		PO Box 428 Grand Portage MN, 55605 United States	Electronic Service		No	M-25-378
147	Taylor	McNair	taylor@gridlab.org			668 Capp Street San Francisco CA, 94110 United States	Electronic Service		No	M-25-378
148	Ronald	Meier	rmeier@mcleodcoop.com	Mcleod Cooperative Power		3515 11th St East Glencoe MN, 55336 United States	Electronic Service		No	M-25-378
149	Melanie	Mesko Lee	melanie.lee@burnsvillemn.gov	City of Burnsville		100 Civic Center Parkway Burnsville MN, 55337-3867 United States	Electronic Service		No	M-25-378

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
150	Peder	Mewis	pmewis@cleangridalliance.org	Clean Grid Alliance		570 Asbury St. St. Paul MN, 55104 United States	Electronic Service		No	M-25-378
151	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	M-25-378
152	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	M-25-378
153	Stacy	Miller	stacy.miller@minneapolismn.gov	City of Minneapolis		350 S. 5th Street Room M 301 Minneapolis MN, 55415 United States	Electronic Service		No	M-25-378
154	David	Moeller	dmoeller@allete.com	Minnesota Power			Electronic Service		No	M-25-378
155	Sarah	Mooradian	sarah@curemn.org	CURE		117 South 1st Street Montevideo MN, 56265 United States	Electronic Service		No	M-25-378
156	Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP		33 South Sixth St Ste 4200 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-378
157	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	M-25-378
158	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	M-25-378
159	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	M-25-378
160	Alan	Muller	alan@greendel.org	Energy & Environmental Consulting		1110 West Avenue Red Wing MN, 55066 United States	Electronic Service		No	M-25-378
161	Sonny	Myers	smyers@1854treatyauthority.org	1854 Treaty Authority		4428 Haines Rd Duluth MN, 55811-1524 United States	Electronic Service		No	M-25-378
162	Pouya	Najmaie	najm0001@gmail.com	Cooperative Energy Futures		3416 16th Ave S Minneapolis	Electronic Service		No	M-25-378

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						MN, 55407 United States				
163	Carl	Nelson	cnelson@mncee.org	Center for Energy and Environment		212 3rd Ave N Ste 560 Minneapolis MN, 55401 United States	Electronic Service		No	M-25-378
164	Deb	Nelson	dnelson@greenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	M-25-378
165	David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency		220 South Sixth Street Suite 1300 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-378
166	Duane	Ninneman	duane@cureriver.org	Clean Up the River Environment		117 South 1st St Montevideo MN, 56265 United States	Electronic Service		No	M-25-378
167	M. William	O'Brien	bobrien@mojlaw.com	Miller O'Brien Jensen, P.A.		120 S 6th St Ste 2400 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-378
168	Ric	O'Connell	ric@gridlab.org	GridLab		2120 University Ave Berkeley CA, 94704 United States	Electronic Service		No	M-25-378
169	Logan	O'Grady	logrady@mnseia.org	Minnesota Solar Energy Industries Association		2288 University Ave W St. Paul MN, 55114 United States	Electronic Service		No	M-25-378
170	Joseph	OBrien	joey.obrien@lowersioux.com			39527 Highway 1 Morton MN, 56270 United States	Electronic Service		No	M-25-378
171	Carol A.	Overland	overland@legalelectric.org	Legalelectric - Overland Law Office		1110 West Avenue Red Wing MN, 55066 United States	Electronic Service		No	M-25-378
172	Gregory	Padden	gpadden@greenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	M-25-378
173	Jessica	Palmer Denig	jessica.palmer-denig@state.mn.us		Office of Administrative Hearings	600 Robert St N PO Box 64620 St. Paul MN, 55164 United States	Electronic Service		No	M-25-378
174	Marsha	Parlow	mparlow@greenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	M-25-378
175	Priti	Patel	ppatel@greenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369-4718 United States	Electronic Service		No	M-25-378
176	Earl	Pendleton	earl.pendleton@lowersioux.com	Lower Sioux Indian Community		39527 Highway 1 Morton MN, 56270 United States	Electronic Service		No	M-25-378

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
177	Gordon	Pietsch	gpietsch@grenergy.com	Great River Energy		12300 Elm Creek Blvd. Maple Grove MN, 55369-4718 United States	Electronic Service		No	M-25-378
178	Joe	Plumer	joe.plumer@redlakenation.org	Red Lake Nation		15484 Migizi Drive Red Lake MN, 56671 United States	Electronic Service		No	M-25-378
179	J.	Porter	greg.porter@nngco.com	Northern Natural Gas Company		1111 South 103rd St Omaha NE, 68124 United States	Electronic Service		No	M-25-378
180	Brian H.	Potts	brian.potts@huschblackwell.com	Husch Blackwell		33 E Main St Ste 300 Madison WI, 53703 United States	Electronic Service		No	M-25-378
181	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	M-25-378
182	Robert	Prescott	bob.prescott@lowersioux.com	Lower Sioux Indian Community		39527 Highway 1 Morton MN, 56270 United States	Electronic Service		No	M-25-378
183	Jody	Puddu	jody.puddu@piic.org	Prairie Island Indian Community		5636 Sturgeon Lake Rd Welch MN, 55089 United States	Electronic Service		No	M-25-378
184	Kurt	Rempe	krempe@nationalgridrenewables.com	National Grid Renewables Development, LLC		8400 Normandale Lake Blvd Suite 1200 Bloomington MN, 55437 United States	Electronic Service		No	M-25-378
185	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	M-25-378
186	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	M-25-378
187	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	M-25-378
188	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	M-25-378

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
189	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	M-25-378
190	Nathaniel	Runke	nrunke@local49.org			611 28th St. NW Rochester MN, 55901 United States	Electronic Service		No	M-25-378
191	Zachary	Ruzycski	zruzycki@greenergy.com	Great River Energy		12300 Elm Creek Boulevard Maple Grove MN, 55369 United States	Electronic Service		No	M-25-378
192	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	M-25-378
193	Joseph L	Sathe	jsathe@kennedy-graven.com	Kennedy & Graven, Chartered		150 S 5th St Ste 700 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-378
194	Adam	Savariego	adams@uppersiouxcommunity-nsn.gov	Upper Sioux Community		5722 Travers Lane PO Box 147 Granite Falls MN, 56241 United States	Electronic Service		No	M-25-378
195	Richard J.	Savelkoul	rsavelkoul@martinsquires.com	Martin & Squires, PA		332 Minnesota St Ste W2750 St. Paul MN, 55101 United States	Electronic Service		No	M-25-378
196	Jeff	Schneider	jeff.schneider@ci.red-wing.mn.us	City of Red Wing		315 West 4th Street Red Wing MN, 55066 United States	Electronic Service		No	M-25-378
197	Peter	Scholtz	peter.scholtz@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	Suite 1400 445 Minnesota Street St. Paul MN, 55101-2131 United States	Electronic Service		No	M-25-378
198	Ronald J.	Schwartau	rschwartau@noblesce.com	Nobles Electric Cooperative		22636 U.S. Hwy. 59 Worthington MN, 56187 United States	Electronic Service		No	M-25-378
199	Douglas	Seaton	doug.seaton@umwlc.org	Upper Midwest Law Center		8421 Wayzata Blvd Ste 300 Golden Valley MN, 55426 United States	Electronic Service		No	M-25-378
200	Jessie	Seim	jessie.seim@piic.org	Prairie Island Indian Community		5636 Sturgeon Lake Rd Welch MN, 55089 United States	Electronic Service		No	M-25-378
201	Darrell	Seki, Sr.	dseki@redlakenation.org			15484 Migizi Drive Red Lake MN, 56671 United States	Electronic Service		No	M-25-378

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
202	Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates		7400 Lyndale Ave S Ste 190 Richfield MN, 55423 United States	Electronic Service		No	M-25-378
203	Andrew R.	Shedlock	andrew.shedlock@kutakrock.com	Kutak Rock LLP		60 South Sixth St Ste 3400 Minneapolis MN, 55402-4018 United States	Electronic Service		No	M-25-378
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213	Mark	Spurr	mspurr@fvbenergy.com	International District Energy Association		222 South Ninth St., Suite 825 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-378
214	Michael	Stalberger	michael.stalberger@blueearthcountymn.gov	Blue Earth County		410 S 5th Street Mankato MN, 56001 United States	Electronic Service		No	M-25-378
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220	Timothy	Sullivan	tsullivan@whe.org	Wright Hennepin Coop. Electric Assn.		6800 Electric Drive PO Box 330 Rockford MN, 55373 United States	Electronic Service		No	M-25-378
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232	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	M-25-378
233	Trent	Waite	twaite@grenergy.com			null null, null United States	Electronic Service		No	M-25-378
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