



414 Nicollet Mall
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November 24, 2025

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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: COMMENTS – INVENERGY’S REQUEST FOR ACTION
APPROVAL OF PPAs FOR FIRM DISPATCHABLE RESOURCES
DOCKET NOS. E002/CN-23-212 AND E002/RP-24-67

Dear Ms. Bergman:

Northern States Power Company, doing business as Xcel Energy, submits these Comments pursuant to the Minnesota Public Utilities Commission’s November 17, 2025 Notice in the above-referenced dockets requesting comments regarding whether Xcel Energy should be required to resume negotiations with Invenergy for the Lake Wilson Solar Energy Center Power Purchase Agreement (PPA).

Xcel Energy should not be compelled to resume negotiations for several substantive reasons, most notably, the persistent and unresolvable issues with the solar component of the project and its associated costs. Invenergy’s proposed facility would be located in an already highly congested area and adding additional solar generation would further strain an already oversaturated area. While the storage component offers some benefits, we do not expect the battery to sufficiently mitigate the solar curtailment impact or contribute meaningfully to relieving congestion in that area, as discussed below.

Xcel Energy attempted to resolve this by proposing to contract for only the battery portion of the project. However, Invenergy indicated that its bid was contingent on the Company accepting the full solar component, as Invenergy’s interconnection is also contingent on the solar component. While the Company remains sympathetic, continuing negotiations will not resolve these fundamental issues. Any Commission directive to continue an already exhausted resolution process would simply misuse customer resources. We continue to encourage Invenergy to reconfigure the project and to consider participating in a future RFP.

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In addition to the fundamental issue above, Invenergy's bid includes several other risks:

- **Supply Chain and Tariff Risk:** Invenergy has not secured their major equipment and, more importantly, has not demonstrated any reasonable efforts to mitigate supply chain or tariff risks. This materially increases the likelihood of additional costs to customers beyond the already inflated pricing shown below in Table 1.
- **Atypical Interconnection Cost Recovery Condition:** Invenergy conditioned its bid on the right to potentially recover additional interconnection costs from customers in the future, beyond those reflected in their bid, despite having an executed Generation Interconnection Agreement with known study results – a highly unusual condition that heightens the uncertainty regarding the ultimate cost burden customers will bear.
- **Development Security Disparity:** Invenergy's bid includes funding for only approximately 60 percent of the development security compared to other projects the Company has advanced for consideration. This shortfall not only presents more project risk for our customers but also undermines the integrity and fairness of the RFP process.

As shown in Table 1 below, the Lake Wilson Solar component is priced significantly higher than any other solar project the Company has requested Commission approval for in our 2024 Request for Proposal.¹ Notably, the Levelized Cost of Energy (LCOE) shown does not reflect potential costs associated with Invenergy's supply chain uncertainty, tariff exposure, congestion impacts, or Invenergy's proposed conditions – all of which are certain to increase costs for our customers.

Table 1
Lake Wilson Solar Pricing Compared to 2024 RFP Solar Projects

Project Name	Developer	Size (MW)	Type	Location	LCOE (\$/MWh)
					[PROTECTED DATA BEGINS]
Lake Wilson Solar	Invenergy	150	PPA	Murray County, Minnesota	
Sherco Solar 4	Xcel Energy	200	Self-Build	Clear Lake Township, Minnesota	

¹ Docket No. E002/M-24-230.

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Project Name	Developer	Size (MW)	Type	Location	LCOE (\$/MWh)
Fillmore Solar	Geronimo Power	15	PPA	Minnesota	
Grant Solar	Geronimo Power	99	PPA	South Dakota	
Portfolio 1	One Energy	41	BT	Wisconsin	
Gopher State Solar	Ranger	200	PPA	Minnesota	
Lemon Hill Solar	Ranger	180	PPA	Minnesota	
Portfolio 2	One Energy	33	BT	Wisconsin	
Total		768			PROTECTED DATA ENDS]

Most importantly, the Lake Wilson Solar project costs presented in Table 1 do not account for curtailment impacts caused by the solar component. Invenergy asserts that the storage component of the Lake Wilson Energy Center will help reduce curtailment in the congested Nobles County area, arguing that solar and wind generation have different generation profiles that can be complementary.² Conceptually, this observation has merit; however, Xcel Energy has consistently expressed reservations whether the proposed solar-to-storage ratio as designed is sufficient to realize these benefits.

To that end, the Company conducted an analysis using Locational Marginal Prices (LMPs) modeled in the MISO Economic Model reference case under the Series 1A Future 2A Long Range Transmission Plan (LRTP) Tranche 2 scenario. Specifically, we examined the forecasted LMPs at a nearby wind farm node – where the Lake Wilson project would be located – which considers all existing and planned generation in the MISO queue as well as the transmission projects in MISO’s Long Range Transmission Plan (LRTP) Tranche 2 portfolio. We compared the forecasted hourly LMPs to the Lake Wilson hourly solar production profile provided in Invenergy’s bid to estimate curtailment.³

Our analysis accounts for the differences between wind and solar generation profiles in that area and, as shown in Table 2 below, still shows a **[PROTECTED DATA BEGINS PROTECTED DATA ENDS]** percent curtailment for the Lake Wilson solar component through 2037.

² Invenergy Response and Request for Action (November 10, 2025), at p. 5.

³ To calculate curtailment, we used an LMP below 10 cents per MWh, a threshold used by default in the MISO Economic Model as a price signal for economic dispatch and curtailment of renewable resources.

Table 2
Expected Curtailment: Lake Wilson Solar Proxy LMP Analysis

	10-Year (2032)	15-Year (2037)	20-Year (2042)
	[PROTECTED DATA BEGINS		
MWh Produced			
MWh Curtailed			
Percent Curtailed			

PROTECTED DATA ENDS]

As shown in Table 2, the Lake Wilson solar component is expected to exacerbate congestion, providing no meaningful benefit to the grid or customers. As further discussed below, we do not expect the battery to sufficiently mitigate the solar curtailment impact or contribute meaningfully to relieving congestion in that area. As previously noted, the Company explored solutions with Invenergy including requesting to contract for only the battery portion of the project, but Invenergy declined this proposal.

Invenergy notes that Xcel Energy's analysis of the Nobles Energy Storage project concluded that the battery is expected to alleviate only part of the operational constraint, and that additional battery storage would likely be needed to fully resolve congestion in the area.⁴ The Nobles battery is a 300 MW / 1,200 MWh battery – three times larger than the proposed 90 MW / 360 MWh Lake Wilson battery. The Lake Wilson project not only includes a much smaller battery, but also adds a new solar resource to an already congested area. The 90 MW / 360 MWh battery, paired with the added solar at Lake Wilson, would not be capable of overcoming the forecasted congestion or providing significant curtailment relief in the area. The magnitude of the curtailment problem simply outpaces the mitigation potential of a battery of this size.

Invenergy requested expedited consideration due to the limited window to finalize a PPA and capture expiring federal tax credits.⁵ While Invenergy cites the urgency of capturing expiring federal tax credits, the Commission's primary obligation is to ensure prudent resource selection in the public interest, not to guarantee developer eligibility for external incentives regardless of the impact to customers.

⁴ Invenergy Response and Request for Action (November 10, 2025), at p. 8.

⁵ *Id.* at p. 2.

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Regardless of the congestion considerations, the numerous unresolved issues outlined above – including supply chain risk, tariff exposure, interconnection cost recovery, and development security – make it difficult to find terms that benefit customers. As discussed in our November 12, 2025 Reply Comments, further discussions would not be productive and would detract from the work to secure beneficial and prudent resources that are in the best interests of Xcel Energy customers. Continuing negotiations under the current circumstances – after more than a year of solutioning – would not only delay progress on more suitable projects but would also risk incurring additional costs. Our decision to not move forward with a PPA for this project as part of this proceeding reflects our commitment to ensuring that any resource we advance delivers clear value to our customers. We continue to encourage Invenenergy to explore opportunities to reconfigure the project and to consider participating in a future RFP.

Tables 1 and 2 above 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 information includes LCOE pricing and curtailment detail the Company and project bidders protect as confidential. This 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 lists. 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

Encl
cc: Service Lists

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 Nos. E002/CN-23-212

E002/RP-24-67

Dated this 24th day of November 2025

/s/

Victor Barreiro

Regulatory Administrator

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10	Amadeo	Bellino	amadeo.bellino@whiteearth-nsn.gov	White Earth Nation		White Earth Tribal Headquarters 35500 Eagle View Road Ogema MN, 56569 United States	Electronic Service		No	24-67
11	Melanie	Benjamin	melanie.benjamin@millelacsband.com			43408 Oodena Drive Onamia MN, 56359 United States	Electronic Service		No	24-67
12	Sasha	Bergman	sasha.bergman@state.mn.us		Public Utilities Commission		Electronic Service		No	24-67
13	Laura	Bishop	laura.bishop@state.mn.us		Minnesota Pollution Control Agency	520 Lafayette Rd Saint Paul MN, 55155 United States	Electronic Service		No	24-67
14	Ingrid	Bjorklund	ingrid@bjorklundlaw.com	Bjorklund Law, PLLC		855 Village Center Drive #256	Electronic Service		No	24-67

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						North Oaks MN, 55127 United States				
15	Hunter	Boldt	hunterboldt@redlakenation.org	Red Lake Nation		15484 Migizi Drive Red Lake MN, 56671 United States	Electronic Service		No	24-67
16	Peter	Boney	pboney@boisforte-nsn.gov	Bois Forte Band of Chippewa		Bois Forte Tribal Government 5344 Lakeshore Drive Nett Lake MN, 55772 United States	Electronic Service		No	24-67
17	Sheldon	Boyd	sheldon.boyd@millelacsband.com	Mille Lacs Band of Ojibwe		43408 Oodena Drive Onamia MN, 56359 United States	Electronic Service		No	24-67
18	Jon	Brekke	jbrekke@greenergy.com	Great River Energy		12300 Elm Creek Boulevard Maple Grove MN, 55369-4718 United States	Electronic Service		No	24-67
19	Matthew	Brodin	mbrodin@allete.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	24-67
20	B. Andrew	Brown	brown.andrew@dorsey.com	Dorsey & Whitney LLP		Suite 1500 50 South Sixth Street Minneapolis MN, 55402-1498 United States	Electronic Service		No	24-67
21	Marvin Ray	Bruneau	marvin.bruneau@millelacsband.com	Mille Lacs Band of Ojibwe		43408 Oodena Drive Onamia MN, 56359 United States	Electronic Service		No	24-67
22	Christina	Brusven	cbrusven@fredlaw.com	Fredrikson Byron		60 S 6th St Ste 1500 Minneapolis MN, 55402-4400 United States	Electronic Service		No	24-67
23	Scott	Buchanan	scottbuchanan@fdlrez.com	Fond du Lac Band of Lake Superior Chippewa		1720 Big Lake Road Cloquet MN, 55720 United States	Electronic Service		No	24-67
24	Shelley	Buck	shelley.buck@piic.org	Prairie Island Indian Community		Prairie Island Indian Community 5636 Sturgeon Lake Road Welch MN, 55089 United States	Electronic Service		No	24-67
25	Robert	Budreau	robert.budreau@llojibwe.net	Leech Lake Band of Ojibwe		190 Sailstar Drive NW Cass Lake MN, 56633 United States	Electronic Service		No	24-67
26	Mike	Bull	mike.bull@state.mn.us		Public Utilities Commission	121 7th Place East, Suite 350 St. Paul MN,	Electronic Service		Yes	24-67

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						55101 United States				
27	Cathy	Chavers	cchavers@boisforte-nsn.gov	Bois Forte Band of Chippewa		Bois Forte Tribal Government 5344 Lakeshore Drive Nett Lake MN, 55772 United States	Electronic Service		No	24-67
28	Marc	Child	mchild@grenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	24-67
29	Michael	Childs, Jr.	michael.childsjr@piic.org	Prairie Island Indian Community		Prairie Island Indian Community 5636 Sturgeon Lake Road Welch MN, 55089 United States	Electronic Service		No	24-67
30	John	Coffman	john@johncoffman.net	AARP		871 Tuxedo Blvd. St. Louis MO, 63119-2044 United States	Electronic Service		No	24-67
31	Generic	Commerce Attorneys	commerce.attorneys@ag.state.mn.us		Office of the Attorney General - Department of Commerce	445 Minnesota Street Suite 1400 St. Paul MN, 55101 United States	Electronic Service		Yes	24-67
32	George	Crocker	gwillc@nawo.org	North American Water Office		5093 Keats Avenue Lake Elmo MN, 55042 United States	Electronic Service		No	24-67
33	Rebecca	Crooks Stratton	rebecca.crooks-stratton@shakopeedakota.org	Shakopee Mdewakanton Sioux Community		Shakopee Mdewakanton Sioux Community 2330 Sioux Trail NW Prior Lake MN, 55372 United States	Electronic Service		No	24-67
34	Brooke	Cunningham	health.review@state.mn.us	Minnesota Department of Health		PO Box 64975 St. Paul MN, 55164-0975 United States	Electronic Service		No	24-67
35	Miyah	Danielson	miyahdanielson@fdlrez.com	Fond du Lac Band of Lake Superior Chippewa		1720 Big Lake Road Cloquet MN, 55720 United States	Electronic Service		No	24-67
36	Jason	Decker	jason.decker@llojibwe.net	Leech Lake Band of Ojibwe		190 Sailstar Drive NW Cass Lake MN, 56633 United States	Electronic Service		No	24-67
37	Bobby	Deschampe	robertdeschampe@grandportage.com	Grand Portage Band of Lake Superior Chippewa		PO Box 428 Grand Portage MN, 55605 United States	Electronic Service		No	24-67
38	Kami	Diver	kamidiver@fdlrez.com	Fond du Lac Band of Lake Superior Chippewa		1720 Big Lake Road Cloquet MN, 55720 United States	Electronic Service		No	24-67

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

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
67	Ronald	Horman	rhorman@redwoodelectric.com	Redwood Electric Cooperative		60 Pine Street Clements MN, 56224 United States	Electronic Service		No	24-67
68	Robbie	Howe	robbie.howe@llojibwe.net	Leech Lake Band of Ojibwe		190 Sailstar Drive NW Cass Lake MN, 56633 United States	Electronic Service		No	24-67
69	John	Ihle	ljihle@rrt.net	PlainStates Energy LLC		27451 S Hwy 34 Barnesville MN, 56514 United States	Electronic Service		No	24-67
70	Annie	Jackson	cheryl.jackson@whiteearth-nsn.gov	White Earth Nation		White Earth Tribal Headquarters 35500 Eagle View Road Ogemo MN, 56569 United States	Electronic Service		No	24-67
71	Faron	Jackson, Sr.	faron.jackson@llojibwe.net			190 Sailstar Drive NW Cass Lake MN, 56633 United States	Electronic Service		No	24-67
72	Justin	Jahnz	justin.jahnz@ecemn.com	East Central Energy		412 Main Ave N Braham MN, 55006 United States	Electronic Service		No	24-67
73	Alan	Jenkins	aj@jenkinsatlaw.com	Jenkins at Law		2950 Yellowtail Ave. Marathon FL, 33050 United States	Electronic Service		No	24-67
74	Kevin	Jensvold	kevinj@uppersiouxcommunity-nsn.gov	Upper Sioux Community		PO Box 147 Granite Falls MN, 56241-0147 United States	Electronic Service		No	24-67
75	Annette	Johnson	annette.johnson@redlakenation.org	Red Lake Nation		15484 Migizi Drive Red Lake MN, 56671 United States	Electronic Service		No	24-67
76	Richard	Johnson	rick.johnson@lawmoss.com	Moss & Barnett		150 S. 5th Street Suite 1200 Minneapolis MN, 55402 United States	Electronic Service		No	24-67
77	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
78	Mark	Kaminski	mark.kaminski@gsa.gov	General Services Administration		1800 F Street NW Washington DC, 20405 United States	Electronic Service		No	24-67
79	Veda	Kanitz	vmkanitz@gmail.com			null null, null United States	Electronic Service		No	24-67
80	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

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#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
94	Christine	Marquis	regulatory.records@xcelenergy.com	Xcel Energy		414 Nicollet Mall MN1180-07-MCA Minneapolis MN, 55401 United States	Electronic Service		No	24-67
95	Shena	Matrious	shena.matrious@millelacsband.com	Mille Lacs Band of Ojibwe		43408 Oodena Drive Onamia MN, 56349 United States	Electronic Service		No	24-67
96	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
97	Ronald	Meier	rmeier@mcleodcoop.com	Mcleod Cooperative Power		3515 11th St East Glencoe MN, 55336 United States	Electronic Service		No	24-67
98	Peder	Mewis	pmewis@cleangridalliance.org	Clean Grid Alliance		570 Asbury St. St. Paul MN, 55104 United States	Electronic Service		No	24-67
99	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
100	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
101	Stacy	Miller	stacy.miller@minneapolismn.gov	City of Minneapolis		350 S. 5th Street Room M 301 Minneapolis MN, 55415 United States	Electronic Service		No	24-67
102	David	Moeller	dmoeller@allete.com	Minnesota Power			Electronic Service		No	24-67
103	Sarah	Mooradian	sarah@curemn.org	CURE		117 South 1st Street Montevideo MN, 56265 United States	Electronic Service		No	24-67
104	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
105	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
106	David	Morrison, Sr.	david.morrison@boisforte-nsn.gov	Bois Forte Band of Chippewa		Bois Forte Tribal Government	Electronic Service		No	24-67

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						5344 Lakeshore Drive Nett Lake MN, 55772 United States				
107	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
108	Sonny	Myers	smyers@1854treatyauthority.org	1854 Treaty Authority		4428 Haines Rd Duluth MN, 55811-1524 United States	Electronic Service		No	24-67
109	Pouya	Najmaie	najm0001@gmail.com	Cooperative Energy Futures		3416 16th Ave S Minneapolis MN, 55407 United States	Electronic Service		No	24-67
110	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
111	Deb	Nelson	dnelson@greenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	24-67
112	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
113	Duane	Ninneman	duane@cureriver.org	Clean Up the River Environment		117 South 1st St Montevideo MN, 56265 United States	Electronic Service		No	24-67
114	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
115	Joseph	OBrien	joey.obrien@lowersioux.com			39527 Highway 1 Morton MN, 56270 United States	Electronic Service		No	24-67
116	Carol A.	Overland	overland@legalelectric.org	Legalelectric - Overland Law Office		1110 West Avenue Red Wing MN, 55066 United States	Electronic Service		No	24-67
117	Gregory	Padden	gpadden@greenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	24-67
118	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
119	Marsha	Parlow	mparlow@greenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove	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, 55369 United States				
120	Priti	Patel	ppatel@grenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369-4718 United States	Electronic Service		No	24-67
121	Earl	Pendleton	earl.pendleton@lowersioux.com	Lower Sioux Indian Community		39527 Highway 1 Morton MN, 56270 United States	Electronic Service		No	24-67
122	Gordon	Pietsch	gpietsch@grenergy.com	Great River Energy		12300 Elm Creek Blvd. Maple Grove MN, 55369-4718 United States	Electronic Service		No	24-67
123	Joe	Plumer	joe.plumer@redlakenation.org	Red Lake Nation		15484 Migizi Drive Red Lake MN, 56671 United States	Electronic Service		No	24-67
124	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
125	Robert	Prescott	bob.prescott@lowersioux.com	Lower Sioux Indian Community		39527 Highway 1 Morton MN, 56270 United States	Electronic Service		No	24-67
126	Jody	Puddu	jody.puddu@piic.org	Prairie Island Indian Community		5636 Sturgeon Lake Rd Welch MN, 55089 United States	Electronic Service		No	24-67
127	Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	1400 BRM Tower 445 Minnesota St St. Paul MN, 55101-2131 United States	Electronic Service		Yes	24-67
128	Kevin	Reuther	kreuther@mncenter.org	MN Center for Environmental Advocacy		26 E Exchange St, Ste 206 St. Paul MN, 55101-1667 United States	Electronic Service		No	24-67
129	Stephan	Roos	stephan.roos@state.mn.us		Minnesota Department of Agriculture	625 Robert St N Saint Paul MN, 55155-2538 United States	Electronic Service		No	24-67
130	Alan	Roy	alan.roy@whiteearth-nsn.gov	White Earth Nation		White Earth Tribal Headquarters 35500 Eagle View Road Ogema MN, 56569 United States	Electronic Service		No	24-67
131	Bill	Rudnicki	bill.rudnicki@shakopeedakota.org	Shakopee Mdewakanton Sioux Community		Shakopee Mdewakanton Sioux Community 2330 Sioux Trail NW Prior Lake MN, 55372 United States	Electronic Service		No	24-67

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
132	Nathaniel	Runke	nrunke@local49.org			611 28th St. NW Rochester MN, 55901 United States	Electronic Service		No	24-67
133	Zachary	Ruzycki	zruzycki@greenergy.com	Great River Energy		12300 Elm Creek Boulevard Maple Grove MN, 55369 United States	Electronic Service		No	24-67
134	Miranda	Sam	miranda.sam@lowersioux.com	Lower Sioux Indian Community		39527 Reservation Highway 1 PO Box 308 Morton MN, 56270 United States	Electronic Service		No	24-67
135	Adam	Savariego	adams@uppersiouxcommunity-nsn.gov	Upper Sioux Community		5722 Travers Lane PO Box 147 Granite Falls MN, 56241 United States	Electronic Service		No	24-67
136	Ronald J.	Schwartau	rschwartau@noblesce.com	Nobles Electric Cooperative		22636 U.S. Hwy. 59 Worthington MN, 56187 United States	Electronic Service		No	24-67
137	Jessie	Seim	jessie.seim@piic.org	Prairie Island Indian Community		5636 Sturgeon Lake Rd Welch MN, 55089 United States	Electronic Service		No	24-67
138	Darrell	Seki, Sr.	dseki@redlakenation.org			15484 Migizi Drive Red Lake MN, 56671 United States	Electronic Service		No	24-67
139	Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates		7400 Lyndale Ave S Ste 190 Richfield MN, 55423 United States	Electronic Service		Yes	24-67
140	Joel	Smith	jsmith@mnchippewatribe.org	Minnesota Chippewa Tribe		PO Box 217 Cass Lake MN, 56633 United States	Electronic Service		No	24-67
141	Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.		76 W Kellogg Blvd St. Paul MN, 55102 United States	Electronic Service		No	24-67
142	Nizhoni	Smith	nizhoni.smith@lowersioux.com	Lower Sioux Indian Community		PO Box 308 39527 Reservation Highway 1 Morton MN, 56270 United States	Electronic Service		No	24-67
143	Roger	Smith, Sr.	rogermsmithsr@fdlrez.com			1720 Big Lake Road Cloquet MN, 55720 United States	Electronic Service		No	24-67
144	Beth	Soholt	bsoholt@cleangridalliance.org	Clean Grid Alliance		570 Asbury Street Suite 201 St. Paul MN, 55104 United States	Electronic Service		No	24-67
145	Marie	Spry	mariespry@grandportage.com			PO Box 428 Grand	Electronic Service		No	24-67

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						Portage MN, 55605 United States				
146	Michael	Stalberger	michael.stalberger@blueearthcountymn.gov	Blue Earth County		410 S 5th Street Mankato MN, 56001 United States	Electronic Service		No	24-67
147	LeRoy	Staples Fairbanks III	leroy.fairbanks@llojibwe.net	Leech Lake Band of Ojibwe		190 Sailstar Drive NW Cass Lake MN, 56633 United States	Electronic Service		No	24-67
148	Byron E.	Starns	byron.starns@stinson.com	STINSON LLP		50 S 6th St Ste 2600 Minneapolis MN, 55402 United States	Electronic Service		No	24-67
149	Mark	Strohfus	mstrohfus@grenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	24-67
150	Samuel	Strong	sam.strong@redlakenation.org	Red Lake Nation		15484 Migizi Drive Red Lake MN, 56671 United States	Electronic Service		No	24-67
151	Timothy	Sullivan	tsullivan@whe.org	Wright Hennepin Coop. Electric Assn.		6800 Electric Drive PO Box 330 Rockford MN, 55373 United States	Electronic Service		No	24-67
152	David	Sunderman	daves@benco.org	BENCO (DUPLICATE)		PO Box 8 Mankato MN, 56002-0008 United States	Electronic Service		No	24-67
153	Camille	Tanhoff	kamip@uppersiouxcommunity-nsn.gov	Upper Sioux Community		5722 Travers Lane PO BOX 147 Granite Falls MN, 56241 United States	Electronic Service		No	24-67
154	Tim	Thompson	tthompson@lrec.coop	Lake Region Electric Cooperative		PO Box 643 1401 South Broadway Pelican Rapids MN, 56572 United States	Electronic Service		No	24-67
155	Geoffrey	Tolley	geoff.tolley@gmail.com			855 Stanley Road Two Harbors MN, 55616-1176 United States	Electronic Service		No	24-67
156	Caralyn	Trutna	carrie@uppersiouxcommunity-nsn.gov	Upper Sioux Community		Upper Sioux Community P.O. Box 147 Granite Falls MN, 55372 United States	Electronic Service		No	24-67
157	Jackie	Van Norman	jvannorman@grenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	24-67
158	Sam	Villella	sdvillella@gmail.com			10534 Alamo Street NE Blaine MN, 55449 United States	Electronic Service		No	24-67
159	Carla	Vita	carla.vita@state.mn.us	MN DEED		Great Northern	Electronic Service		No	24-67

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