

215 South Cascade Street
PO Box 496
Fergus Falls, Minnesota 56538-0496
218 739-8200
www.otpc.com (web site)

May 12, 2026



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

**PUBLIC DOCUMENT –
NOT PUBLIC (OR PRIVILEGED)
DATA HAS BEEN EXCISED**

**RE: In the Matter of the Distribution System Planning for Otter Tail
Power Company
Docket No. E017/M-25-141
Integrated Distribution Plan**

Dear Ms. Bergman,

Otter Tail Power Company (Otter Tail) respectfully submits its Integrated Distribution Plan (IDP) Reply Comments in the above-referenced matter.

Portions of the Reply Comments concerning an analysis of the cost effectiveness of certain substation transformer sizing contain confidential competitive cost data. In addition, Attachment 1 provided with these Reply Comments contains information concerning substation feeder outage information, including confidential data consisting of the location of certain outages and affected customers. The foregoing confidential information (the "Protected Data") has economic value, actual or potential, from not being generally known to, and not being readily ascertainable by proper means by other persons and is subject to the efforts by OTP to protect the information from public disclosure. The Protected Data therefore: (1) constitutes trade secret information, as defined in Minn. Stat. § 13.37, subd. 1(b); (2) is classified as nonpublic data pursuant to Minn. Stat. § 13.37, subd. 2; (3) is also not public data, as defined in Minn. Stat. § 13.02, subd. 8a; and (4) is protected data under Minn. R. 7829.0100, subp. 19a(A).

If you have any questions regarding this filing, please contact me at 218-739-8278 or at amnelson@otpc.com.

Sincerely,

/s/TONY NELSON

Tony Nelson
Manager Asset Strategies and Engineering
System Infrastructure and Reliability

kde
Enclosures
By electronic filing
c: Service List

**STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION**

**In the Matter of Otter Tail Power
Company's 2025 Integrated
Distribution Plan**

**Docket No. E017/M-25-141
REPLY COMMENTS**

I. INTRODUCTION

Otter Tail Power Company (OTP or Company) appreciates the Minnesota Department of Commerce's (Department or DOC) thorough review of OTP's Integrated Distribution Plan (IDP). OTP values the Department's continued engagement in the IDP process and appreciates the Department's recommendation that the Commission approve OTP's IDP.

OTP's current IDP is consistent with the structure, intent, and level of detail provided in its prior Minnesota IDP filings. Over successive planning cycles, OTP has incrementally enhanced its IDP to improve transparency around system conditions, planning drivers, risk identification, and capital prioritization—while maintaining the IDP's foundational role as a forward-looking planning document rather than a cost recovery filing.

OTP's planning philosophy remains grounded in long-standing cost discipline and prudent investment. The Company's history of low electric rates reflects decades of deliberate planning, full utilization of asset useful lives, and careful prioritization of capital investments. OTP's IDP supports this philosophy by identifying system needs early and enabling proactive, measured solutions that avoid unnecessary or premature spending.

OTP respectfully notes that its size and scale within Minnesota are different than other utilities in the state. Likewise our tools, resources and organizational structure and capacity as they relate to distribution planning may also differ, as will the nature of data we maintain and manage. The same is true for certain decision thresholds. From OTP's perspective, these differences are appropriate and reflect a reasonable effort to balance cost and benefits to the benefit of our customers. These differences may in some instances affect OTP's ability to provide the precise nature or scope of information requested by the DOC for this and future IDPs. In some cases we may not have specific data, or such data is not reasonably available in form sought by the Department. OTP has endeavored to be responsive and looks forward to working with the Department and other stakeholders.

To that end, OTP would welcome the opportunity for the Department or other stakeholders to tour OTP distribution facilities in the field. Such a tour would provide firsthand insight into the condition of system assets and demonstrate how OTP maintains and operates its infrastructure through its full useful life—context that can be valuable when evaluating system needs and investment timing.

II. OTTER TAIL POWER RESPONSES TO DOC COMMENTS

The following responds to the DOC's request for additional information and preliminary recommendations in the order presented in the DOC's comments, pp. 56-59.

C. Capacity:

The Department requests OTP present in reply comments, a summary histogram that plots the number of substation transformers in bins of substation transformer utilization (peak load / rated capacity) sized at 10% bin widths, from 0% to 100%, with an overflow bin of $\geq 100\%$. OTP should provide a second histogram of substation transformer utilization compared to emergency ratings, if this data is readily accessible. These histograms should exclude substations with either 0 measured load or no data logging capabilities.

C.1

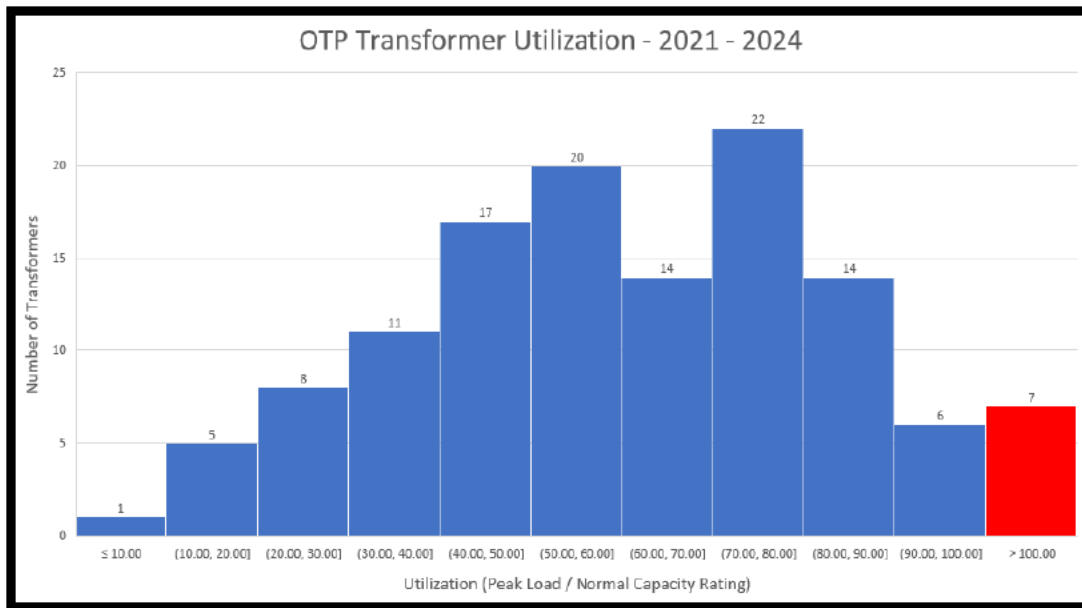


Figure 1: OTP Transformer Utilization Histogram

OTP does not directly maintain emergency ratings for distribution substation transformers. Accordingly, the transformer Utilization Histogram was developed using only the transformers' normal nameplate ratings.

OTP further discusses its methodologies and the manner in which capacity overload risks at substations are evaluated in greater detail in Section C.2 below.

The Department requests OTP explain in reply comments how the Company views capacity overload risks at its substations and the need for capacity mitigations with historic or existing substation transformer overloads. As applicable, OTP should discuss why the Company has no plans to mitigate substation transformer capacity overloads at any substation transformers that have not been identified for upgrades.

C.2

OTP plans distribution substations to operate at or below transformer nameplate capacity ($\leq 100\%$ loading) under normal conditions, using this threshold as its primary benchmark for identifying capacity constraints. Substations nearing this level are evaluated for operational adjustments, load transfers, or capacity upgrades, with particular attention to maintaining sufficient margin in smaller or single-substation systems to accommodate localized variability and seasonal peaks. OTP also recognizes that transformers can safely operate above nameplate for limited durations and therefore evaluates the durations of these overloads to identify the amount of time the equipment spent above the nameplate rating to assess system resilience and inform the timing of mitigation actions.

Rather than relying on a single threshold, OTP applies a risk-based approach to overload conditions, considering factors such as magnitude, frequency, duration, seasonal patterns, and available operational mitigation. This allows OTP to prioritize investments where reliability risk is sustained or material, while using alternatives such as feeder reconfiguration, load transfers, or other operational measures where appropriate. Substations exceeding nameplate capacity are actively monitored, and in cases where overloads are infrequent or short-duration, OTP may defer capital upgrades in favor of cost-effective, data-driven solutions that maintain reliable service.

The Department requests OTP present in reply comments, a feeder utilization histogram that is comparable to the Department's requested substation transformer utilization histogram using OTP's Feeder Data Spreadsheet.

C.3

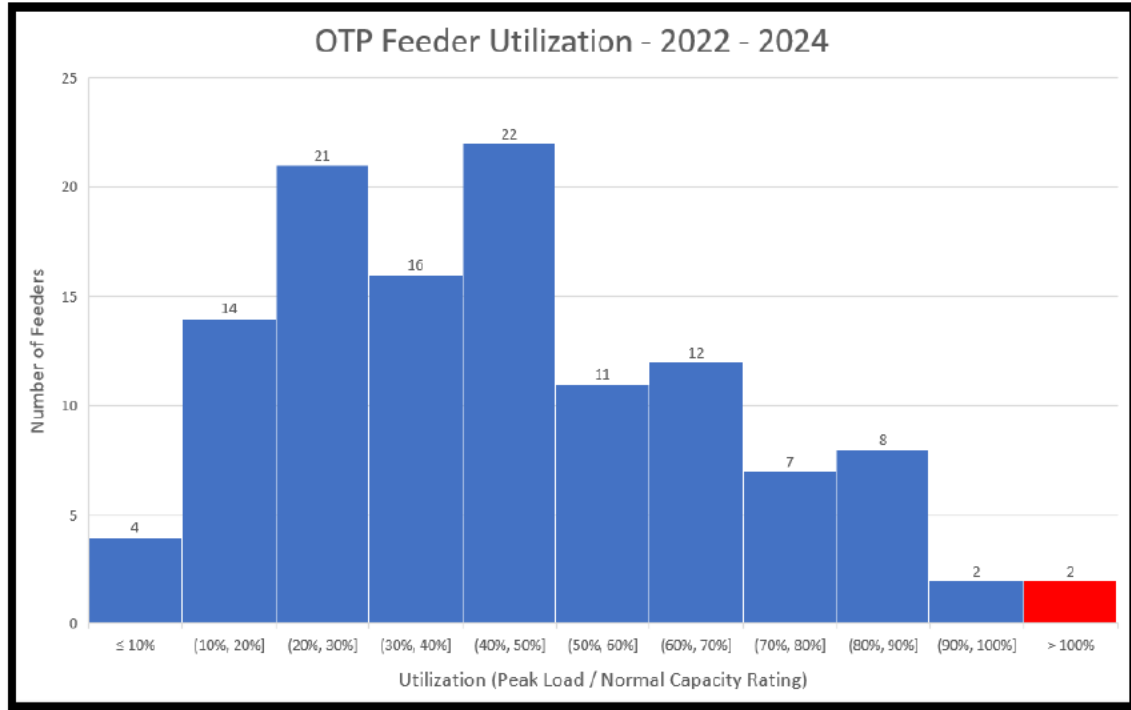


Figure 2: OTP Feeder Utilization Histogram

OTP notes that the Feeder Utilization Histogram referenced above in Figure 2 is derived from the Company's internal Feeder Data Spreadsheet. This spreadsheet uses the distribution modeling software Synergi Electric to allocate known substation meter demand across individual feeders on a pro-rata basis. The allocation is based solely on downstream connected kVA, which reflects the size and phasing of each downstream service transformer.

Historically, this methodology has been the primary means by which OTP has obtained feeder-level insights prior to the full incorporation of Advanced Metering Infrastructure (AMI) data into internal studies and planning methodologies.

While this approach provides a general indication of individual feeder loading and overall system condition, the allocation methodology can at times produce inaccurate or potentially misleading results. Common examples include apparent phase imbalances, where one phase may appear thermally overloaded while the remaining phases are shown to be operating below normal limits. OTP has observed that although this methodology can help identify the potential presence of phase imbalance on the system, the Synergi Electric allocation process may depict these conditions as more severe than they are in actual field conditions.

Accordingly, the feeder utilization histogram data should be interpreted within this context and should not be assumed to represent measurements obtained from physical meters installed directly on individual feeders.

The Department requests OTP present in reply comments a cost effectiveness analysis of a 1.5 MVA and 2.0 MVA substation transformer sizing standard compared to its 2.5 MVA standard.

C.4

OTP currently stocks 1.0 MVA, 1.5 MVA, and 2.5 MVA units (updated from prior reporting). In response to the Department's request, OTP reviewed the cost effectiveness of adding a 2.0 MVA standard in addition to 2.5 MVA versus utilizing 2.5 MVA transformers for all applications with required capacity between 1.5 MVA and 2.5 MVA. As described below, OTP concludes the incremental cost-effectiveness benefit associated with adding a 2.0 MVA standard would be limited. Current pricing indicates a 2.0 MVA transformer is approximately **[PROTECTED DATA BEGINS...**

...PROTECTED DATA ENDS] and a 2.5 MVA transformer is approximately **[PROTECTED DATA BEGINS...** **...PROTECTED DATA ENDS]**, a difference of approximately **[PROTECTED DATA BEGINS...**

...PROTECTED DATA ENDS]. This equates to a 3% increase in cost for a 25% increase in capacity. OTP estimates that, at best, approximately one to two of these annual applications would have load below 2.0 MVA and be suitable for a 2.0 MVA unit; accordingly, realized annual purchase-cost savings would likely be limited to approximately **[PROTECTED DATA BEGINS...**

...PROTECTED DATA ENDS].

In addition, due to long lead times of transformers (2-3 years), OTP would be required to add at least 1, 2.0 MVA unit to standard inventory to maintain appropriate spare coverage and operational flexibility. This would require incremental inventory capital of the same price as the unit itself as well as ongoing carrying, storage, and management costs, which would further reduce the cost effectiveness of adding a new standard size relative to the limited annual purchase-cost savings.

Adding a 2.0 MVA standard would also increase inventory complexity by introducing an additional standard size and associated planning and coordination requirements. Finally, selecting a 2.0 MVA unit in lieu of a 2.5 MVA unit would provide less headroom for future load growth at the served location, potentially increasing the likelihood of an earlier upgrade or replacement if load increases. For these reasons, OTP concludes the cost-effectiveness benefit of standardizing on both 2.0 MVA and 2.5 MVA units would be limited compared to continuing to utilize 2.5 MVA units for

requirements in the 1.5–2.5 MVA range, while maintaining the existing 1.0 MVA and 1.5 MVA (with fan-upgrade capability) standards.

D. Reliability:

The Department recommends that OTP, in its reply comments, provide a short narrative linking each major reliability-driven program in Appendix B, by MN IDP Category, to specific outage causes, reported in Table 3. The narrative should also quantify, where feasible, the share of each program's Minnesota spend that is directed at each primary cause category.

D.1

To provide additional clarity on the relationship between reliability-driven investments and observed outage drivers, OTP has mapped each Minnesota IDP Category to the outage cause categories presented in Table 3. As shown in Table D.1 below, this mapping identifies where IDP programs are expected to mitigate specific outage causes. It is not feasible to break out share of each program's MN spend that is directed at these causes.

Table D.1 – MN IDP Categories and Interruption Cause Mitigations

MN IDP Category				
Cause	Age related/Asset Renewal	PQ & Reliability Upgrades	Capacity Upgrades	Grid Mod & Pilot Projects
Material or Equipment Failure	x	x	x	x
Squirrel	x	x		
Maintenance	x	x	x	
Weather	x	x		x
Tree on Line	x	x		
Cause unknown	x	x	x	x
Public	x	x		
Animal caused, not squirrel	x	x		
Equipment fault or operation	x	x	x	x
Fire	x	x	x	x
Downstream customer issue	NA	NA	NA	NA
x = Table 3 Outage cause potentially requiring mitigation spend in respective MN IDP Category				

To further support this relationship, OTP evaluated a subset of localized reliability projects where outage history could be directly associated with specific feeders

and program scopes. This analysis utilizes 2023 and 2024 outage data and focuses on projects with defined geographic boundaries (e.g., OH-to-UG conversions, feeder rebuilds, and targeted upgrades). Larger system-wide programs were excluded where project impacts could not be isolated spatially.

Table 3 – Summary of Outage Cause Distribution for Specific Projects (2023–2024)

MN IDP Category - Program	Events	Cust- Min	Squirrel	Tree on the line	Animal	Weather	Equip Failure	Equip Fault	Cause Unknown
Age Related/Asset Renewal									
Battle Lake-Bury OH and Create Tie <i>Feeders: BATTLE LAKE - NORTH FEEDER, BATTLE LAKE - SOUTH FEEDER, BATTLE LAKE - TOWN FEEDER</i>	30	400,317	16	4	1	2	2	2	3
Bemidji-Birchmont N Feeder OH to UG <i>Feeders: BEMIDJI BIRCHMONT-NORTH F</i>	5	76,829	2	2	0	0	0	0	1
Bury SE Feeder <i>Feeders: FERGUS BUSE - SOUTH LINCO, FERGUS BUSE - SOUTHWEST, FERGUS BUSE- NORTHWEST FE, FERGUS NORTHEAST - HIGH S, FERGUS NORTHEAST - HOSPIT, FERGUS NORTHEAST - JENSEN, FERGUS NORTHEAST - SPRING, FERGUS NORTHEAST - WATER, FERGUS SOUTHEAST - OCR 15, FERGUS SOUTHEAST - OCR 45, FERGUS SOUTHEAST - OCR 55</i>	142	776,103	36	40	20	13	26	2	5
Bury West Cleveland Feeder <i>Feeders: FERGUS N CLEVELAND - WEST</i>	26	258,434	10	9	0	2	5	0	0
Fergus - Bury Hoot Lake Feeders <i>Feeders: FERGUS NORTHEAST - HIGH S, FERGUS NORTHEAST - HOSPIT, FERGUS NORTHEAST - SPRING</i>	46	241,507	14	8	11	1	11	0	1
Fergus-Bury Dist in Alley <i>Feeders: FERGUS BUSE- NORTHWEST FE</i>	23	108,480	5	6	1	5	5	1	0
Frazee Distribution OH to UG <i>Feeders: FRAZEE - RURAL FEEDER</i>	17	82,973	1	6	1	2	3	0	4
Frazee-Scalp Lake OH-UG <i>Feeders: FRAZEE - RURAL FEEDER</i>	17	82,973	1	6	1	2	3	0	4
Frazee-Wimer Lake OH-UG <i>Feeders: FRAZEE - RURAL FEEDER</i>	17	82,973	1	6	1	2	3	0	4
Minto-Bury South End of Feeder <i>Feeders: Minto - Main Feeder</i>	6	946	4	0	0	0	0	0	2
PQ & Reliability Upgrades									
Battle Lake-Otter Outlet Upgrades <i>Feeders: BATTLE LAKE - NORTH FEEDER, BATTLE LAKE - SOUTH FEEDER, BATTLE LAKE - TOWN FEEDER</i>	30	400,317	16	4	1	2	2	2	3
Rush Otter South Feeder Upgrades <i>Feeders: RUSH OTTERTAIL LAKE - SOU</i>	15	282,764	5	4	0	3	3	0	0

Note: The above table only quantifies localized projects where reliability impact is correlated to historical feeder performance.

The share of each program's Minnesota spend directed at annually reducing each primary outage cause category is not quantifiable.

The Department requests that OTP, in reply comments, explain the reasoning behind the significant reduction in the forecasted budget for reliability and power quality upgrades from 2025-2029.

D.2

The largest component of the historical spend within the reliability and power quality category is in response to storm recovery. In the past three years (2022, 2023, 2024), OTP has experienced significant storm damage funded from the budgets within this category. Currently, the forecast reflects a lower, more modest and normal storm budget (companywide). This is due to the fact we cannot predict storm damage in any given year. This is then reflected in lower power quality and reliability spend when compared to recent history.

The Department requests that OTP, in reply comments, report its reliability metrics outcomes, categorized with workstation and substation, from the reliability and power quality investments made from 2020-2024. These metrics should include actual SAIDI, SAIFI, CAIDI, and customer minutes of outage (CMO), where applicable.

D.3

OTP will work with the Department to provide appropriate data. At this time, however, it is not clear what workstations and substations are included in this request. In addition, OTP does not track project outcomes as a standard practice to report metrics such as CMO's. OTP does track a sampling of projects to see how reliability has improved with investments on some of the larger projects.

The Department requests that OTP, in reply comments, explain the reasoning behind classifying OHto-UG conversion projects to two MN IDP Categories (PQ & Reliability Upgrades and Age Related/Asset Renewal) in Appendix B.

D.4

OTP reported its projects in the defined MN IDP categories, which are different than OTP internal project categories. For OTP, this mapping is a manual process which can be subjective. In addition, many projects can span both reliability and asset health categories. Thus, assumptions must be made in determining the MN IDP category the project predominately falls for reporting purposes. The IDP categories provide a general sense of where spend is occurring regardless of the assumptions made.

The Department requests that OTP, in reply comments, provide a short summary table for all Minnesota strategic OH-to-UG project planned or completed during 2025-2029. This table should specify which criteria (safety, customer impacted, outage history, restoration access, vegetation-management access, backlot vs. front-lot routing) were determinative in selecting that project. Additionally, OTP should identify any feeders that met several criteria but were not selected and explain the reasons for their exclusion.

D.5

All OTP OH to UG projects meet one or more of the drivers and criteria as listed in the MN IDP, but developing the list of specific drivers for projects completed is not feasible. Accurate data is not readily available and would take substantial labor resources to complete.

The Department requests that OTP, in reply comments, provide, for at least Fergus Falls and Morris, pre-project and post-project feeder-level SAIDI, SAIFI, and CAIDI values for at least the most recent 12-24 months.

D.6

To evaluate feeder-level reliability performance, OTP reviewed recent outage data for feeders serving the Fergus Falls and Morris service areas where reliability work was completed in 2024. Feeder-level SAIDI, SAIFI, and CAIDI values were compared to the most recent full-year performance following project completion.

CSC	Substation	Feeder	Year	SAIDI	CAIDI	SAIFI
Fergus Falls	Ottertail City Sub	North Feeder	2024	678.64	251.90	2.69
			2025	84.21	76.19	1.11
Morris	Wheaton S. 115 kV Sub	North Feeder	2024	621.52	215.11	2.89
			2025	139.04	277.63	0.50

For the Fergus Falls - Ottertail City Sub North Feeder, reliability work included completion of an overhead-to-underground conversion project in mid-2024, along with prior targeted vegetation management and underground replacement work in select sections of the feeder.

For the Morris - Wheaton S. 115 kV Sub North Feeder, reliability improvements completed during 2024 included replacement of aging underground facilities, overhead-to-underground conversion work, equipment replacements such as cutouts, and late-year vegetation management activities.

The Department requests that OTP, in reply comments, explain why its normalized generic cost estimates show underground taps as less costly than overhead taps, including: 1) what specific cost components (labor, materials, easements, restoration) are included for each case; 2) whether different design assumptions (e.g., conductor size, trenching conditions, service configuration) apply to the tap cases; and 3) whether these values reflect Minnesota specific or system-wide averages.

D.7

The cost estimates referred to are calculated via OTP's work order (WO) design system software and include all Labor, Overhead, Material, Contractor, and Other costs required for 1 mile of construction. Both estimates were for similar size conductor as well as other assumptions for easements. The costs provided are OTP system wide estimate and not MN specific. OTP does not estimate or plan the system on a state by state basis but rather a holistic view. Specifically, the UG tap is estimated as less through the WO system as 80% of the project/tap is assumed to be plowed vs bored which equated to lower contractor costs.

E. Age Related Replacements And Asset Renewal

The Department requests that OTP present, in reply comments, an explanation of how old its four undergrounding projects are, and describe any reasons why each planned project is scheduled to be replaced before or after the 50 year depreciation period. The discussion should include OTP's criteria used to prioritize Underground Asset Replacement projects.

E.1

Please note that the observed average service life of all assets in a utility account represents a wide range of assets and therefore individual assets within that account will have widely varied actual service lives. It is expected that the average asset age at a particular facility will not always align with the account's average service life. The applicable account's average service life or depreciable life is an average of the observed and expected service lives of all assets within the broad group.

Early underground cable from the 1970s and 1980s has a much shorter life expectancy than currently manufactured cable today. This is due to improvements in the insulation and jacketing that surround modern day cable.

OTP assumes the reference to the underground projects are the following from Appendix B from OTPs 2025 IDP report and are as follows (which is 5 budgets instead of 4):

D05048.0525	Underground Primary Replace 2025
7309	Underground Primary Replace 2026
7614	Underground Primary Replace 2027
7834	Underground Primary Replace 2028
8266	Underground Primary Replace 2029

These underground primary replacement budgets each represent over 100 work orders, or individual projects, on any given year. Identifying the vintage of these projects would require individual field validation by project or work order. As is customary for all utilities, Otter Tail utilizes mass asset accounting by jurisdiction and does not specify each asset location for installed distribution underground applications and therefore specific vintage tracking by distribution underground facility is not readily available without significant further evaluation.

The Department requests that OTP present, in reply comments, an explanation of how old its nine substation projects are, and describe any reasons why each planned project is scheduled to be replaced before or after the 45 year depreciation period.

E.2

As noted above, observed average service life of all assets in a utility account represents a wide range of assets and therefore individual assets within that account will have widely varied actual service lives. It is expected that the average asset age at a particular facility will not always align with its account's average service life. The applicable account's average service life or depreciable life is an average of the observed and expected service lives of all assets within the broad group. A substation is made up of many different components of varying lifespans. If a component fails or reaches end of life, it will be replaced and the rest of the substation assets will continue to remain in service. Thus, determining an average substation age is not a perfect calculation when considering variations of vintages within a substation. Finally, when a substation is upgraded or replaced, if there are components that can be re-used or salvaged, they are taken back into inventory. Thus, even if there was an asset that is "newer" it doesn't mean the assets is thrown away if there is still useful life left in it.

All that to say, the following represents the average age of the substations requested based on accumulated and escalated installed value. Escalations are based off Handy-Whitmen indexes. Also note when planners are looking at substation replacements,

gathering of accounting book information is not a practice employed by engineers. Rather they are reviewing installed asset conditions and performance.

- Bemidji BSU Substation – average age ~45 years
- Brandon Substation – average age ~35 years
- Clitherall substation – average age ~45 years
- Elizabeth-Carlisle substation – average age ~46 years
- Erhard substation – average age ~48 years
- Frazee substation – average age ~53 years
- Red Lake Falls substation – average age ~54 years
- Rothsay substation – average age ~51 years
- Vining substation – average age ~42 years

The Department requests that OTP present, in reply comments, an explanation of why OTP's two substation Consolidation projects and two New Substation projects are necessary compared to replacing the substations like for like.

E.3

The new substations at Carlos and Clearbrook require substation “new builds” because the old substation site equipment must stay in service until the new substation is constructed, commissioned, and existing feeders connected, so load can be served.

The Clitherall-Vining and Elizabeth-Carlisle Substation consolidation project retires two old wood pole substations located within road ROW ditches along with aging equipment and replaces these with one new steel multi-feeder substation. This will increase reliability to each town listed by providing feeder tie backup capabilities at/from the new substation locations. Annual maintenance costs will also be reduced by eliminating a substation.

In addition, the scope of the Brandon substation has now changed from a rebuild project to a transformer upgrade.

The Department requests that OTP explain, in reply comments, how the Company plans to address the risk of oversized system assets in its planned Age Related Replacements and Asset Renewal projects.

E.4

Age-Related Replacement and Asset Renewal projects are primarily driven by asset condition, safety, resilience, and reliability needs rather than by load growth expectations. When replacement is required, OTP evaluates whether the existing asset remains appropriately sized relative to current and forecasted local load and system configuration. Where replacement in-kind meets reliability and safety objectives, OTP generally pursues that option. Deviations from existing sizes are supported by engineering review.

F. Wildfire

The Department requests that OTP present in its reply comments a breakdown of all fire outages caused by wildfire compared to all fire outages caused by any other means. OTP should outline which specific outages in IR 5 correspond to actual wildfires.

F.1

In reviewing the Department's assessment of wildfire risk, it appears as though a correlation between fire caused outages is being associated with wildfire risk. In this regard, OTP has had minimal interruptions to customers due to a fire. In 2023 and 2024, there were 3 fires that created interruptions to OTP customers. Those are summarized below.

[PROTECTED DATA BEGINS...]

Outage ID	Date	CSC : Substation	Customers	Dur (min)	What Happened
2023-03-24-0244	Mar 24, 2023			1	External fire -- grain elevator fire in Hoffman caused the main feeder breaker to operate.
2023-11-08-0137	Nov 08, 2023			124	External fire -- house fire at 206 3rd St NE, Twin Valley encroached on OTP service line.
2024-04-06-0060	Apr 06, 2024			128	External fire -- fire caused by public resulted in a pole fire at Beltrami Junction feeder.

...PROTECTED DATA ENDS]

However, there are more interruptions on the system annually that create a fire. This usually is a fire that is contained to the pole or a very localized area. That said, these are more closely aligned to the risk OTPs WMP is looking to mitigate; reducing the risk of energized utility assets creating an uncontrollable fire.

The remaining fire-noted interruptions in IR5, and summarized in table 10 in the DOC comments, are all related to OTP assets. This would include cross arm fires, pole fires, transformers fires, etc. None of these fires led to uncontrolled wildfire.

The Department requests that OTP un-redact, as appropriate, the Department's trade secret summary of OTP's outage data from IR 5.

F.2

Attachment 1 to IR5 has been un-redacted, as appropriate.

H. Non-Wires Alternative Analysis

The Department requests that OTP, in reply comments, clarify and describe the types of projects it considers for its NWA analysis.

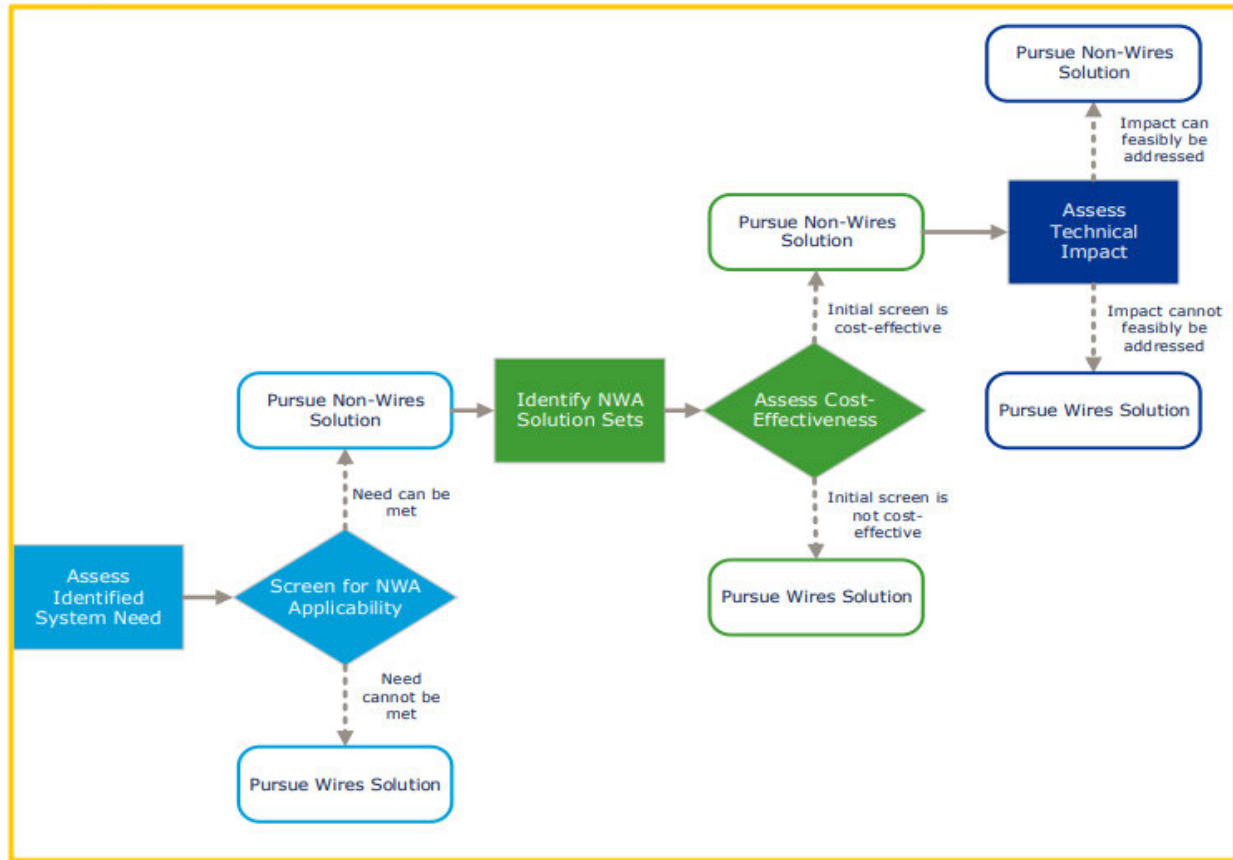
H.1

In addition to Capacity driven projects, OTP anticipates Interconnection, Sectionalizing and Contingency type projects as candidates for requiring an NWA analysis.

The Department requests that OTP, in reply comments, describe the Company's process for its NWA analysis.

H.2

Below is the proposed high level NWA Initial Screening Process Flowchart OTP is planning to use for future NWA project analysis.



III. CONCLUSION

OTP appreciates the Department's review of its IDP and the Department's recommendation that the Commission approve the plan. OTP's IDP is consistent with its historical filings and continues the Company's long-standing approach to integrated, data-driven planning that supports system reliability, safety, resiliency, and affordability for customers.

OTP appreciates the recommendations outlined in the Department's Preliminary Recommendations section. While some suggestions extend beyond the Company's present system capabilities and staffing levels, OTP recognizes their value and is actively considering them within its continuous improvement roadmap. Enhanced benefit-cost analysis related to reliability and asset health projects remains a priority for OTP. The Company looks forward to exploring these recommendations further as staffing, consulting resources, and software systems evolve, and remains committed to ongoing collaboration to address these areas together wherever feasible.

The Company remains committed to continuous improvement and constructive collaboration. OTP values the Department's insights and looks forward to ongoing dialogue regarding the evolution of IDP reporting in a manner that remains proportionate, meaningful, and consistent with Commission intent. OTP also reiterates its openness to stakeholder engagement and welcomes opportunities for site visits and field discussions that provide additional transparency into its system and planning practices. OTP welcomes the Commission and Commission staff on site for further discussion and field visits to provide firsthand perspective on current OTP practices and the Company's disciplined, cost-conscious approach to maintaining safe and reliable service.

Based on the record in this proceeding and consistent with prior IDP approvals, OTP respectfully requests that the Commission approve its IDP as filed.

Dated: May 12, 2026

Respectfully submitted,

OTTER TAIL POWER COMPANY

By: /s/ TONY NELSON

Tony Nelson

Manager, Asset Strategies and Engineer
System Infrastructure and Reliability

Otter Tail Power Company

215 S. Cascade Street

Fergus Falls, MN 56537

(218) 739-8278

amnelson@otpc.com

CERTIFICATE OF SERVICE

**RE: In the Matter of Otter Tail Power Company's 2025 Integrated
Distribution Plan
Docket No. E017/M-25-141**

I, Khris Ekstrom, hereby certify that I have this day served a copy of the following, or a summary thereof, on Sasha Bergman and Sharon Ferguson by e-filing, and to all other persons on the attached service list by electronic service or by First Class Mail.

**Otter Tail Power Company
Reply Comments**

Dated this **12th** day of **May, 2026**.

/s/ KHRIS EKSTROM
Khris Ekstrom
Regulatory Filing Coordinator
Otter Tail Power Company
215 South Cascade Street
Fergus Falls MN 56537
(218) 739-8334

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
1	Daniel	Abelson	daniel.abelson@metc.state.mn.us	Metropolitan Council		390 Robert Street N. St. Paul MN, 55101 United States	Electronic Service		No	M-25-141
2	Brian	Allen	brian.allen@allenergysolar.com	All Energy Solar, Inc		1642 Carroll Ave Saint Paul MN, 55104 United States	Electronic Service		No	M-25-141
3	Michael	Allen	michael.allen@allenergysolar.com	All Energy Solar		721 W 26th st Suite 211 Minneapolis MN, 55405 United States	Electronic Service		No	M-25-141
4	Ellen	Anderson	ellena@umn.edu	325 Learning and Environmental Sciences		1954 Buford Ave Saint Paul MN, 55108 United States	Electronic Service		No	M-25-141
5	Janet	Anderson	jcainstp@icloud.com	-		1799 Sargent St, Paul MN, 55105 United States	Electronic Service		No	M-25-141
6	Jay	Anderson	jaya@cmpas.org	CMPAS		7550 Corporate Way Suite 100 Eden Prairie MN, 55344 United States	Electronic Service		No	M-25-141
7	MK	Anderson	anderson@fresh-energy.org	Fresh Energy		408 St Peter Street Saint Paul MN, 55102 United States	Electronic Service		No	M-25-141
8	David	Assaf	daassaf@flaherty-hood.com	Flaherty & Hood, P.A.		525 Park Street Suite 470 St. Paul MN, 55102 United States	Electronic Service		No	M-25-141
9	Donna	Attanasio	dattanasio@gwu.edu	George Washington University		2000 H Street NW Washington DC, 20052 United States	Electronic Service		No	M-25-141
10	John	Bailey	bailey@ilsr.org	Institute For Local Self-Reliance		1313 5th St SE Ste 303 Minneapolis MN, 55414 United States	Electronic Service		No	M-25-141
11	Anjali	Bains	bains@fresh-energy.org	Fresh Energy		408 Saint Peter Ste 220 Saint Paul MN, 55102 United States	Electronic Service		No	M-25-141
12	Mark	Bakk	mbakk@lcp.coop	Lake Country Power		26039 Bear Ridge Drive Cohasset MN, 55721 United States	Electronic Service		No	M-25-141
13	Jared	Ballew	jared.ballew@ev.energy	EV.ENERGY CORP		726 18th St. Des Moines IA, 50314 United States	Electronic Service		No	M-25-141
14	Shay	Banton	shayb@irecusa.org	Interstate Renewable Energy Council		600 H Street NE Apt. 341 Washington DC, 20002 United States	Electronic Service		No	M-25-141
15	Laura	Beaton	beaton@smwlaw.com	Shute, Mihaly & Weinberger LLP		396 Hayes Street San Francisco CA, 94102 United States	Electronic Service		No	M-25-141

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
16	Mathias	Bell	mathias@weavegrid.com	WeaveGrid		375 Alabama Street, Suite 325 San Francisco CA, 94110 United States	Electronic Service		No	M-25-141
17	Jeff	Benson	jbenson@southcentralelectric.com	South Central Electric Association		PO Box 150 71176 Tiell Drive St. James MN, 56081 United States	Electronic Service		No	M-25-141
18	Sasha	Bergman	sasha.bergman@state.mn.us		Public Utilities Commission	121 7th Pl E Ste 350 St. Paul MN, 55101 United States	Electronic Service		Yes	M-25-141
19	Derek	Bertsch	derek.bertsch@mrenergy.com	Missouri River Energy Services		3724 West Avera Drive PO Box 88920 Sioux Falls SD, 57109-8920 United States	Electronic Service		No	M-25-141
20	Barb	Bischoff	barb.bischoff@nngco.com	Northern Natural Gas Co.		CORP HQ, 714 1111 So. 103rd Street Omaha NE, 68124-1000 United States	Electronic Service		No	M-25-141
21	Ingrid	Bjorklund	ibjorklund@avisenlegal.com	Avisen Legal		901 S. Marquette Ave. #1675 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-141
22	Ingrid	Bjorklund	ingrid@bjorklundlaw.com	Bjorklund Law, PLLC		855 Village Center Drive #256 North Oaks MN, 55127 United States	Electronic Service		No	M-25-141
23	William	Black	bblack@mmua.org	MMUA		Suite 200 3131 Fernbrook Lane North Plymouth MN, 55447 United States	Electronic Service		No	M-25-141
24	Kenneth	Bradley	kbradley@environmentminnesota.org			2837 Emerson Ave S Apt CW112 Minneapolis MN, 55408 United States	Electronic Service		No	M-25-141
25	Jon	Brekke	jbrekke@grenergy.com	Great River Energy		12300 Elm Creek Boulevard Maple Grove MN, 55369-4718 United States	Electronic Service		No	M-25-141
26	Kathleen	Brennan	kbrennan@spencerfane.com	Spencer Fane LLP		100 South Fifth Street, Suite 2500 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-141
27	Sydney R.	Briggs	sbriggs@swce.coop	Steele-Waseca Cooperative Electric		2411 W. Bridge St PO Box 485 Owatonna MN, 55060-0485 United States	Electronic Service		No	M-25-141
28	Mark B.	Bring	mbring@otpc.com	Otter Tail Power Company		215 South Cascade Street	Electronic Service		No	M-25-141

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						PO Box 496 Fergus Falls MN, 56538-0496 United States				
29	Matthew	Brodin	mbrodin@allete.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	M-25-141
30	Ed	Brolin	ed.brolin@rwe.com	RWE Clean Energy		100 Summit Lake Drive Suite 210 Valhalla NY, 10595 United States	Electronic Service		No	M-25-141
31	Christopher	Browning	christopher.browning@nexteraenergy.com			null null, null United States	Electronic Service		No	M-25-141
32	Christina	Brusven	cbrusven@fredlaw.com	Fredrikson Byron		60 S 6th St Ste 1500 Minneapolis MN, 55402-4400 United States	Electronic Service		No	M-25-141
33	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	M-25-141
34	Jerry	Byer	jbyer@itasca-mantrap.com	Itasca-Mantrap Electric Cooperative		PO Box 192 Park Rapids MN, 56470 United States	Electronic Service		No	M-25-141
35	Jennifer	Cady	jjcady@mnpower.com	Minnesota Power		30 W Superior St Duluth MN, 55802 United States	Electronic Service		No	M-25-141
36	Daniel T	Carlisle	todd-wad@toddwadana.coop	Todd-Wadana Electric Cooperative		550 Ash Ave NE PO Box 431 Wadena MN, 56482 United States	Electronic Service		No	M-25-141
37	Douglas M.	Carnival	dcarnival@carnivalberns.com	McGrann Shea Carnival Straughn & Lamb		800 Nicollet Mall Ste 2600 Minneapolis MN, 55402-7035 United States	Electronic Service		No	M-25-141
38	Pat	Carruth	pat@mnvalleyrec.com	Minnesota Valley Coop. Light & Power Assn.		501 S 1st St. PO Box 248 Montevideo MN, 56265 United States	Electronic Service		No	M-25-141
39	Gabriel	Chan	gabechan@umn.edu			130 Hubert H. Humphrey Center 301 19th Ave S Minneapolis MN, 55455 United States	Electronic Service		No	M-25-141
40	Ray	Choquette	rchoquette@agp.com	Ag Processing Inc.		12700 West Dodge Road PO Box 2047 Omaha NE, 68103-2047 United States	Electronic Service		No	M-25-141
41	Eric	Clement	eclement@mnpower.com	Minnesota Power		null null, null United States	Electronic Service		No	M-25-141
42	City	Clerk	gregg.engdahl@ci.stcloud.mn.us	City of St. Cloud		400 Second St. S	Electronic Service		No	M-25-141

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						St. Cloud MN, 56301 United States				
43	Joshua	Cohen	josh.cohen@swtchenenergy.com	SWTCH Energy, Inc.		Greentown Labs 444 Somerville Avenue Somerville MA, 02143 United States	Electronic Service		No	M-25-141
44	Kenneth A.	Colburn	kcolburn@symbioticstrategies.com	Symbiotic Strategies, LLC		26 Winton Road Meredith NH, 32535413 United States	Electronic Service		No	M-25-141
45	Steve	Coleman	stevecolemanpuma@gmail.com			231 Winifred St W Saint Paul MN, 55107 United States	Electronic Service		No	M-25-141
46	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	M-25-141
47	Kevin	Cray	kevin@communitysolaraccess.org	CCSA		1644 Platte St Denver CO, 80202 United States	Electronic Service		No	M-25-141
48	George	Crocker	gwillc@nawo.org	North American Water Office		5093 Keats Avenue Lake Elmo MN, 55042 United States	Electronic Service		No	M-25-141
49	Stacy	Dahl	sdahl@minnkota.com	Minnkota Power Cooperative, Inc.		5301 32nd Ave S Grand Forks ND, 58201 United States	Electronic Service		No	M-25-141
50	George	Damian	gdamian@cleanenergyeconomymn.org	Clean Energy Economy MN		13713 Washburn Ave S Burnsville MN, 55337 United States	Electronic Service		No	M-25-141
51	Lisa	Daniels	lisadaniels@windustry.org	Windustry		201 Ridgewood Ave Minneapolis MN, 55403 United States	Electronic Service		No	M-25-141
52	James	Darabi	james.darabi@solarfarm.com			2355 Fairview Ave #101 St. Paul MN, 55113 United States	Electronic Service		No	M-25-141
53	Cody	Davis	cdavis@epeconsulting.com	Electric Power Engineers (ELPC/VS)		null null, null United States	Electronic Service		No	M-25-141
54	Danielle	DeMarre	danielle.demarre@allenergysolar.com	All Energy Solar		1264 Energy Lane St Paul MN, 55108 United States	Electronic Service		No	M-25-141
55	Timothy	DenHerder Thomas	timothy@cooperativeenergyfutures.com	Cooperative Energy Futures		3500 Bloomington Ave. S Minneapolis MN, 55407 United States	Electronic Service		No	M-25-141
56	James	Denniston	james.r.denniston@xcelenergy.com	Xcel Energy Services, Inc.		414 Nicollet Mall, 401-8 Minneapolis MN, 55401 United States	Electronic Service		No	M-25-141

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
57	Curt	Dieren	curt.dieren@dgr.com	L&O Power Cooperative		1302 S Union St Rock Rapids IA, 51246 United States	Electronic Service		No	M-25-141
58	Cheryl	Dietrich	cheryl.dietrich@nexteraenergy.com	NextEra Energy Resources, LLC		700 Universe Blvd E1W/JB Juno Beach FL, 33408 United States	Electronic Service		No	M-25-141
59	Diane	Dietz	diane.dietz@state.mn.us		Department of Commerce	Suite 280 85 Seventh Place East St. Paul MN, 55101-2198 United States	Electronic Service		No	M-25-141
60	Ian M.	Dobson	ian.m.dobson@xcelenergy.com	Xcel Energy		414 Nicollet Mall, 401-8 Minneapolis MN, 55401 United States	Electronic Service		No	M-25-141
61	Kristin	Dolan	kdolan@meeker.coop	Meeker Cooperative Light & Power Assn		1725 US Hwy 12 E. Ste 100 Litchfield MN, 55355 United States	Electronic Service		No	M-25-141
62	Renee	Doyle	guydoyleelectric@gmail.com	Doyle Electric Inc.		PO Box 295 Amboy MN, 56010 United States	Electronic Service		No	M-25-141
63	Carlton	Doyle Fontaine	carlton.doyle.fontaine@senate.mn	MN Senate		75 Rev Dr Martin Luther King Jr Blvd Room G-17 St Paul MN, 55155 United States	Electronic Service		No	M-25-141
64	Adam	Duininck	aduininck@ncsrcc.org	North Central States Regional Council of Carpenters		700 Olive Street St. Paul MN, 55130 United States	Electronic Service		No	M-25-141
65	John R.	Dunlop, P.E.	jdunlop@resminn.com	Renewable Energy Services		Suite 300 448 Morgan Ave. S. Minneapolis MN, 55405-2030 United States	Electronic Service		No	M-25-141
66	Hannah	Dunn	hannah.dunn@oakdalemn.gov	City of Oakdale		1584 Hadley Ave N Oakdale MN, 55104 United States	Electronic Service		No	M-25-141
67	Kelly	Dybdahl	kdybdahl@llec.coop	Lyon-Lincoln Electric Cooperative, Inc.		205 W. Hwy. 14 Tyler MN, 56178 United States	Electronic Service		No	M-25-141
68	Brian	Edstrom	briane@cubminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota St Ste W1360 Saint Paul MN, 55101 United States	Electronic Service		No	M-25-141
69	Dick	Edwards	dedwards@ci.maple-grove.mn.us	City of Maple Grove		12800 Arbor Lakes Parkway P O Box 1180 Maple Grove MN, 55311-6180 United States	Electronic Service		No	M-25-141
70	William	Ehrlich	wehrlich@tesla.com	Tesla, Inc.		3500 Deer Creek Rd Palo Alto CA, 94304 United States	Electronic Service		No	M-25-141

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
71	Kristen	Eide Tollefson	healingsystems69@gmail.com	R-CURE		28477 N Lake Ave Frontenac MN, 55026-1044 United States	Electronic Service		No	M-25-141
72	Bob	Eleff	bob.eleff@house.mn	Regulated Industries Cmte		100 Rev Dr Martin Luther King Jr Blvd Room 600 St. Paul MN, 55155 United States	Electronic Service		No	M-25-141
73	R. Neal	Elliot	rmelliott@aceee.org	American Council for an Energy-Efficient Economy		ACEEE 529 14th St NW Ste 600 Washington DC, 20045 United States	Electronic Service		No	M-25-141
74	Nadav	Enbar	nenbar@epri.com	EPRI		1117 Quince Ave Boulder CO, 80304 United States	Electronic Service		No	M-25-141
75	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-25-141
76	Christian	Fenstermacher	christian.fenstermacher@owatonnautilities.com	Owatonna Municipal Public Utilities		PO Box 800 208 S Walnut Ave Owatonna MN, 55060 United States	Electronic Service		No	M-25-141
77	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-25-141
78	Christine	Fox	cfox@itasca-mantrap.com	Itasca-Mantrap Coop. Electric Assn.		PO Box 192 Park Rapids MN, 56470 United States	Electronic Service		No	M-25-141
79	Kornbaum	Frank	fkornbaum@mnpower.com			null null, null United States	Electronic Service		No	M-25-141
80	Nathan	Franzen	nathan@nationalgridrenewables.com	Geronimo Energy, LLC		8400 Normandale Lake Blvd Ste 1200 Bloomington MN, 55437 United States	Electronic Service		No	M-25-141
81	David	Freestate	dfreestate@epri.com	EPRI		942 Corridor Park Blvd Knoxville TN, 37932 United States	Electronic Service		No	M-25-141
82	Katelyn	Frye	kfrye@mnpower.com	Minnesota Power		30 W Superior St Duluth MN, 55802-2093 United States	Electronic Service		No	M-25-141
83	Jessica	Fyhrie	jfyhrie@otpc.com	Otter Tail Power Company		PO Box 496 Fergus Falls MN, 56538-0496 United States	Electronic Service		No	M-25-141
84	Edward	Garvey	garveyed@aol.com	Residence		32 Lawton St Saint Paul MN, 55102 United States	Electronic Service		No	M-25-141

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
85	Allen	Gleckner	agleckner@elpc.org	Environmental Law & Policy Center		35 E. Wacker Drive, Suite 1600 Suite 1600 Chicago IL, 60601 United States	Electronic Service		No	M-25-141
86	Jenny	Glumack	jenny@mrea.org	Minnesota Rural Electric Association		11640 73rd Ave N Maple Grove MN, 55369 United States	Electronic Service		No	M-25-141
87	Sean	Gosiewski	sean@afors.org	Alliance for Sustainability		2801 21st Ave S Ste 100 Minneapolis MN, 55407 United States	Electronic Service		No	M-25-141
88	Scott	Greenbert	scott@nautilussolar.com	Nautilus Solar Energy, LLC		396 Springfield Ave, Ste 2 Summit NJ, 07901 United States	Electronic Service		No	M-25-141
89	Sarah	Groebner	sgroebner@redwoodelectric.com	Redwood Electric Cooperative		60 Pine St Clements MN, 56224 United States	Electronic Service		No	M-25-141
90	Tim	Gross	tgross@fuelingmn.com	Fueling Minnesota		3244 Rice Street St. Paul MN, 55126 United States	Electronic Service		No	M-25-141
91	Cody	Gustafson	cgustafson@mnpower.com			null null, null United States	Electronic Service		No	M-25-141
92	Tom	Guttormson	tom.guttormson@connexusenergy.com	Connexus Energy		14601 Ramsey Blvd Ramsey MN, 55303 United States	Electronic Service		No	M-25-141
93	Natalie	Haberman	townsend@fresh-energy.org	Fresh Energy		408 St Peter St # 350 St. Paul MN, 55102 United States	Electronic Service		No	M-25-141
94	Nicholas	Haeg	haeg@fresh-energy.org			12298 Bass Trail Sauk Centre MN, 56378 United States	Electronic Service		No	M-25-141
95	James	Haler	jhaler@southcentralelectric.com	South Central Electric Association		71176 Tiell Dr P. O. Box 150 St. James MN, 56081 United States	Electronic Service		No	M-25-141
96	Joe	Halso	joe.halso@sierraclub.org	Sierra Club		1536 Wynkoop St Ste 200 Denver CO, 80202 United States	Electronic Service		No	M-25-141
97	Donald	Hanson	dfhanson@ieee.org			P. O. Box 44579 Eden Prairie MN, 55344 United States	Electronic Service		No	M-25-141
98	John	Harlander	john.c.harlander@xcelenergy.com	Xcel Energy		null null, null United States	Electronic Service		No	M-25-141
99	Kim	Havey	kim.havey@minneapolismn.gov	City of Minneapolis		350 South 5th Street, Suite 315M Minneapolis MN, 55415 United States	Electronic Service		No	M-25-141
100	Todd	Headlee	theadlee@dvigridsolutions.com	Dominion Voltage, Inc.		701 E. Cary Street	Electronic Service		No	M-25-141

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						Richmond VA, 23219 United States				
101	Amber	Hedlund	amber.r.hedlund@xcelenergy.com	Northern States Power Company dba Xcel Energy-Elec		414 Nicollet Mall, 401-7 Minneapolis MN, 55401 United States	Electronic Service		No	M-25-141
102	Tiana	Heger	theher@mnpower.com	Minnesota Power		30 W. Superior Street Duluth MN, 55802 United States	Electronic Service		No	M-25-141
103	Adam	Heinen	aheinen@dakotaelectric.com	Dakota Electric Association		4300 220th St W Farmington MN, 55024 United States	Electronic Service		No	M-25-141
104	Annete	Henkel	mui@mnutilityinvestors.org	Minnesota Utility Investors		413 Wacouta Street #230 St.Paul MN, 55101 United States	Electronic Service		No	M-25-141
105	Jessy	Hennesy	jessy.hennesy@avantenergy.com	Avant Energy		220 S. Sixth St. Ste 1300 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-141
106	Mari	Hernandez	mari@irecusa.org	IREC		null null, null United States	Electronic Service		No	M-25-141
107	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-25-141
108	Joe	Hoffman	ja.hoffman@smmpa.org	SMMPA		500 First Ave SW Rochester MN, 55902-3303 United States	Electronic Service		No	M-25-141
109	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	M-25-141
110	Casey	Horan	choran@edf.org	Environmental Defense Fund		123 Mission St San Francisco CA, 94105 United States	Electronic Service		No	M-25-141
111	Ronald	Horman	rhorman@redwoodelectric.com	Redwood Electric Cooperative		60 Pine Street Clements MN, 56224 United States	Electronic Service		No	M-25-141
112	Frank	Hornstein	frank.hornstein@minneapolismn.gov	City of Minneapolis		350 South 5th Street Minneapolis MN, 55415 United States	Electronic Service		No	M-25-141
113	Samantha	Houston	shouston@ucs.org	Union of Concerned Scientists		1825 K St NW Ste 800 Washington DC, 20006 United States	Electronic Service		No	M-25-141
114	Lori	Hoyum	lhoyum@mnpower.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	M-25-141

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
115	Jan	Hubbard	jan.hubbard@comcast.net			7730 Mississippi Lane Brooklyn Park MN, 55444 United States	Electronic Service		No	M-25-141
116	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-25-141
117	Reuben	Hunter	bhunter@madisonei.com	Madison Energy Investments		8100 Boone Blvd Suite 430 Vienna VA, 22182 United States	Electronic Service		No	M-25-141
118	Casey	Jacobson	cjacobson@bepc.com	Basin Electric Power Cooperative		1717 East Interstate Avenue Bismarck ND, 58501 United States	Electronic Service		No	M-25-141
119	John S.	Jaffray	jjaffray@jjrpower.com	JJR Power		350 Highway 7 Suite 236 Excelsior MN, 55331 United States	Electronic Service		No	M-25-141
120	Robert	Jagusch	rjagusch@mmua.org	MMUA		3025 Harbor Lane N Minneapolis MN, 55447 United States	Electronic Service		No	M-25-141
121	Chris	Jarosch	chris@carrcreekelctricservice.com	Carr Creek Electric Service, LLC		209 Sommers Street North Hudson WI, 54016 United States	Electronic Service		No	M-25-141
122	Alan	Jenkins	aj@jenkinsatlaw.com	Jenkins at Law		2950 Yellowtail Ave. Marathon FL, 33050 United States	Electronic Service		No	M-25-141
123	Richard	Johnson	rickjohnson@cozen.com	Cozen O'Connor		150 S. 5th Street Suite 1200 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-141
124	Sarah	Johnson Phillips	sjphillips@stoel.com	Stoel Rives LLP		33 South Sixth Street Suite 4200 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-141
125	Nate	Jones	njones@hcpd.com	Heartland Consumers Power		PO Box 248 Madison SD, 57042 United States	Electronic Service		No	M-25-141
126	Philip	Jones	phil@evtransportationalliance.org			1402 Third Ave Ste 1315 Seattle WA, 98101 United States	Electronic Service		No	M-25-141
127	Julie	Jorgensen	julie@greenmark.us.com	Greenmark Solar		4630 Quebec Ave N New Hope MN, 55428-4973 United States	Electronic Service		No	M-25-141
128	Kevin	Joyce	kjoyce@tesla.com			null null, null United States	Electronic Service		No	M-25-141
129	Mahmoud	Kabalan	mahmoud.kabalan@stthomas.edu	University of St Thomas		2115 Summit Ave, Mail OSS100 School of Engineering	Electronic Service		No	M-25-141

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						Saint Paul MN, 55105 United States				
130	Camille	Kadoch	ckadoch@raponline.org	Regulatory Assistance Project		50 State Street Suite 3 Montpelier VT, 05602 United States	Electronic Service		No	M-25-141
131	Cliff	Kaehler	cliff.kaehler@novelenergy.biz	Novel Energy Solutions LLC		4710 Blaylock Way Inver Grove Heights MN, 55076 United States	Electronic Service		No	M-25-141
132	Ralph	Kaehler	ralph.kaehler@gmail.com			13700 Co. Rd. 9 Eyota MN, 55934 United States	Electronic Service		No	M-25-141
133	Michael	Kampmeyer	mkampmeyer@aeg-group.com	AEG Group, LLC		260 Salem Church Road Sunfish Lake MN, 55118 United States	Electronic Service		No	M-25-141
134	Nick	Kaneski	nick.kaneski@enbridge.com	Enbridge Energy Company, Inc.		11 East Superior St Ste 125 Duluth MN, 55802 United States	Electronic Service		No	M-25-141
135	Jack	Kegel	jkegel@mmua.org	MMUA		3025 Harbor Lane N Suite 400 Plymouth MN, 55447-5142 United States	Electronic Service		No	M-25-141
136	William	Kenworthy	will@votesolar.org			1 South Dearborn St Ste 2000 Chicago IL, 60603 United States	Electronic Service		No	M-25-141
137	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-25-141
138	Tom	Key	tkey@epri.com	EPRI		942 Corridor Park Blvd Knoxville TN, 37932 United States	Electronic Service		No	M-25-141
139	Bobby	King	bking@solarunitedneighbors.org	Solar United Neighbors		3140 43rd Ave S Minneapolis MN, 55406 United States	Electronic Service		No	M-25-141
140	Jack	Kluempke	jack.kluempke@state.mn.us		Department of Commerce	85 7th Place East Suite 600 St. Paul MN, 55101 United States	Electronic Service		No	M-25-141
141	Aaron	Knoll	aknoll@greeneespel.com	Greene Espel PLLP		222 South Ninth Street Suite 2200 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-141
142	Steve	Kosbab	skosbab@meeker.coop	Meeker Cooperative Light and Power		1725 US Hwy 12 E Litchfield MN, 55355 United States	Electronic Service		No	M-25-141
143	Nathan	Kostiuk	nathan.c.kostiuk@xcelenergy.com	Xcel Energy		414 Nicollet Mall, 401-07 Minneapolis	Electronic Service		No	M-25-141

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						MN, 55401 United States				
144	Brian	Krambeer	bkrambeer@mienergy.coop	MiEnergy Cooperative		PO Box 626 31110 Cooperative Way Rushford MN, 55971 United States	Electronic Service		No	M-25-141
145	Michael	Krause	michaelkrause61@yahoo.com			1200 Plymouth Avenue Minneapolis MN, 55411 United States	Electronic Service		No	M-25-141
146	Michael	Krikava	mkrikava@taftlaw.com	Taft Stettinius & Hollister LLP		2200 IDS Center 80 S 8th St Minneapolis MN, 55402 United States	Electronic Service		No	M-25-141
147	Corrina	Kumpe	ckumpe@mysunshare.com			null null, null United States	Electronic Service		No	M-25-141
148	Matthew	Lacey	mlacey@greenergy.com	Great River Energy		12300 Elm Creek Boulevard Maple Grove MN, 55369-4718 United States	Electronic Service		No	M-25-141
149	James D.	Larson	james.larson@avantenergy.com	Avant Energy Services		220 S 6th St Ste 1300 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-141
150	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-25-141
151	Burnell	Lauer	blauer,sundial@gmail.com	Sundial Solar		3209 W, 76th St #305 Edina MN, 55435 United States	Electronic Service		No	M-25-141
152	Dean	Leischow	dean@sunrisenrg.com	Sunrise Energy Ventures		315 Manitoba Ave Ste 200 Wayzata MN, 55391 United States	Electronic Service		No	M-25-141
153	Annie	Levenson Falk	annief@cupminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota Street, Suite W1360 St. Paul MN, 55101 United States	Electronic Service		No	M-25-141
154	Benjamin	Levine	blevine@mnpower.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	M-25-141
155	Becky	Li	bli@rmi.org			17 State St 25th floor unit 2500 New York NY, 10004 United States	Electronic Service		No	M-25-141
156	Amy	Liberkowsky	amy.a.liberkowsky@xcelenergy.com	Xcel Energy		414 Nicollet Mall 7th Floor Minneapolis MN, 55401-1993 United States	Electronic Service		No	M-25-141

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
157	Carl	Linville	clivill@raponline.org			50 State Street Suite #3 Montpelier VT, 05602 United States	Electronic Service		No	M-25-141
158	Phillip	Lipetsky	greenenergyproductsllc@gmail.com	Green Energy Products		PO Box 108 Springfield MN, 56087 United States	Electronic Service		No	M-25-141
159	Jody	Londo	jody.l.londo@xcelenergy.com	Xcel Energy		414 Nicillet Mall 7th Floor Minneapolis MN, 55401-1993 United States	Electronic Service		No	M-25-141
160	Susan	Ludwig	sludwig@mnpower.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	M-25-141
161	Brian	Lydic	brian@irecusa.org	Interstate Renewable Energy Council, Inc.		PO Box 1156 Latham NY, 12110-1156 United States	Electronic Service		No	M-25-141
162	Madeline	Lydon	madeline.k.lydon@xcelenergy.com	Xcel Energy		401 NICOLLET MALL Floor 7 Minneapolis MN, 55401 United States	Electronic Service		No	M-25-141
163	Richard	Macke	macker@powersystem.org	Power System Engineering, Inc.		10710 Town Square Dr NE Ste 201 Minneapolis MN, 55449 United States	Electronic Service		No	M-25-141
164	Alice	Madden	alice@communitypowermn.org	Community Power		2720 E 22nd St Minneapolis MN, 55406 United States	Electronic Service		No	M-25-141
165	Alex	Magerko	amagerko@epri.com	EPRI		942 Corridor Park Blvd Knoxville TN, 37932 United States	Electronic Service		No	M-25-141
166	Kavita	Maini	kmairi@wi.rr.com	KM Energy Consulting, LLC		961 N Lost Woods Rd Oconomowoc WI, 53066 United States	Electronic Service		No	M-25-141
167	Tom	Mammen	thomas.j.mammen@xcelenergy.com	Xcel Energy		null null, null United States	Electronic Service		No	M-25-141
168	Discovery	Manager	discoverymanager@mnpower.com	Minnesota Power		30 W Superior St Duluth MN, 55802 United States	Electronic Service		No	M-25-141
169	Christine	Marquis	regulatory.records@xcelenergy.com	Xcel Energy		414 Nicollet Mall MN1180-07-MCA Minneapolis MN, 55401 United States	Electronic Service		No	M-25-141
170	Gregg	Mast	gmast@cleanenergyeconomyymn.org	Clean Energy Economy Minnesota		4808 10th Avenue S Minneapolis MN, 55417 United States	Electronic Service		No	M-25-141
171	Erica	McConnell	emcconnell@elpc.org	Environmental Law & Policy Center		35 E. Wacker Drive, Suite 1600	Electronic Service		No	M-25-141

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						Chicago IL, 60601 United States				
172	Jess	McCullough	jmccullough@mnpower.com	Minnesota Power		30 W Superior St Duluth MN, 55802 United States	Electronic Service		No	M-25-141
173	Sara G	McGrane	smcgrane@felhaber.com	Felhaber Larson		220 S 6th St Ste 2200 Minneapolis MN, 55420 United States	Electronic Service		No	M-25-141
174	Natalie	McIntire	natalie.mcintire@gmail.com	Wind on the Wires		570 Asbury St Ste 201 Saint Paul MN, 55104-1850 United States	Electronic Service		No	M-25-141
175	Matthew	Melewski	matthew@theboutiquefirm.com	Nokomis Energy LLC & Ole Solar LLC		2639 Nicollet Ave Ste 200 Minneapolis MN, 55408 United States	Electronic Service		No	M-25-141
176	Thomas	Melone	thomas.melone@allcous.com	Minnesota Go Solar LLC		222 South 9th Street Suite 1600 Minneapolis MN, 55120 United States	Electronic Service		No	M-25-141
177	Michael	Menzel	mike.m@sagiliti.com	Sagiliti		23505 Smithtown Rd. Suite 280 Excelsior MN, 55331 United States	Electronic Service		No	M-25-141
178	Tim	Mergen	tmergen@meeker.coop	Meeker Cooperative Light And Power		1725 US Hwy 12 E, Suite 100 PO Box 68 Litchfield MN, 55355 United States	Electronic Service		No	M-25-141
179	Pontius	Mike	mpontius@mnpower.com			null null, null United States	Electronic Service		No	M-25-141
180	Brian	Millberg	fwengineering@comcast.net			695 Grand Ave #222 Saint Paul MN, 55105 United States	Electronic Service		No	M-25-141
181	Luther	Miller	luther.c.miller@xcelenergy.com	Xcel Energy		null null, null United States	Electronic Service		No	M-25-141
182	Marc	Miller	mmiller@soltage.com	Soltage, LLC		66 York Street, 5th Floor Jersey City NJ, 07302 United States	Electronic Service		No	M-25-141
183	Marcus	Mills	marcus@communitypowermn.org	Community Power		2720 E 22nd St Minneapolis MN, 55406 United States	Electronic Service		No	M-25-141
184	Darrick	Moe	darrick@mrea.org	Minnesota Rural Electric Association		11640 73rd Ave N Maple Grove MN, 55369 United States	Electronic Service		No	M-25-141
185	Dalene	Monsebroten	dalene.monsebroten@nmpagency.com	Northern Municipal Power Agency		123 2nd St W Thief River Falls MN, 56701 United States	Electronic Service		No	M-25-141

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
186	Brian	Monson	brian.l.monson@xcelenergy.com	Xcel Energy		null null, null United States	Electronic Service		No	M-25-141
187	Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP		33 South Sixth St Ste 4200 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-141
188	Susan	Mudd	smudd@elpc.org	Environmental Law and Policy Center		35 E. Wacker Drive, Suite 1600 Chicago IL, 60601 United States	Electronic Service		No	M-25-141
189	Pouya	Najmaie	najm0001@gmail.com	Cooperative Energy Futures		3416 16th Ave S Minneapolis MN, 55407 United States	Electronic Service		No	M-25-141
190	Alex	Nelson	anelson@dakotaelectric.com	Dakota Electric Association		4300 220nd St Farmington MN, 55024 United States	Electronic Service		No	M-25-141
191	Anthony	Nelson	amnelson@otpc.com	Ottertail Power		53233 Sunrise Ln Park Rapids MN, 56470 United States	Electronic Service		No	M-25-141
192	Ben	Nelson	benn@cmpasgroup.org	CMMPA		459 South Grove Street Blue Earth MN, 56013 United States	Electronic Service		No	M-25-141
193	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-25-141
194	Darin	Nelson	dnelson@minnetonkamn.gov	City of Minnetonka		14600 Minnetonka Blvd Minnetonka MN, 55345 United States	Electronic Service		No	M-25-141
195	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-25-141
196	Sephra	Ninow	sephra.ninow@energycenter.org	Center for Sustainable Energy		426 17th Street, Suite 700 Oakland CA, 94612 United States	Electronic Service		No	M-25-141
197	Michael	Noble	noble@fresh-energy.org	Fresh Energy		408 Saint Peter St Ste 350 Saint Paul MN, 55102 United States	Electronic Service		No	M-25-141
198	Rolf	Nordstrom	rnordstrom@gpsd.net	Great Plains Institute		2801 21ST AVE S STE 220 Minneapolis MN, 55407-1229 United States	Electronic Service		No	M-25-141
199	Samantha	Norris	samanthanorris@alliantenergy.com	Interstate Power and Light Company		200 1st Street SE PO Box 351 Cedar Rapids IA, 52406-0351 United States	Electronic Service		No	M-25-141

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
200	David	O'Brien	david.obrien@navigant.com	Navigant Consulting		77 South Bedford St Ste 400 Burlington MA, 01803 United States	Electronic Service		No	M-25-141
201	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-25-141
202	Patty	O'Keefe	patty.okeefe@sierradlub.org			2525 Emerson Ave S Apt 2 Minneapolis MN, 55405 United States	Electronic Service		No	M-25-141
203	Timothy	O'Leary	toleary@llec.coop	Lyon-Lincoln Electric Cooperative, Inc		P.O. Box 639 Tyler MN, 56178-0639 United States	Electronic Service		No	M-25-141
204	Jeff	O'Neill	jeff.oneill@ci.monticello.mn.us	City of Monticello		505 Walnut Street Suite 1 Monticello MN, 55362 United States	Electronic Service		No	M-25-141
205	Matthew	Olsen	molsen@otpc.com	Otter Tail Power Company		215 South Cascade Street Fergus Falls MN, 56537 United States	Electronic Service		No	M-25-141
206	Russell	Olson	rolson@hcpd.com	Heartland Consumers Power District		PO Box 248 Madison SD, 57042-0248 United States	Electronic Service		No	M-25-141
207	Wendi	Olson	wolson@otpc.com	Otter Tail Power Company		215 South Cascade Street Fergus Falls MN, 56537 United States	Electronic Service		No	M-25-141
208	Carol A.	Overland	overland@legalelectric.org	Legalelectric - Overland Law Office		1110 West Avenue Red Wing MN, 55066 United States	Electronic Service		No	M-25-141
209	Bethany	Owen	bowen@mnpower.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	M-25-141
210	Cezar	Panait	cezar.panait@state.mn.us		Public Utilities Commission	121 7th Place East Suite 350 St. Paul MN, 55101 United States	Electronic Service		No	M-25-141
211	Dan	Patry	dpatry@sunedison.com	SunEdison		600 Clipper Drive Belmont CA, 94002 United States	Electronic Service		No	M-25-141
212	Jeffrey C	Paulson	jeff.jcplaw@comcast.net	Paulson Law Office, Ltd.		4445 W 77th Street Suite 224 Edina MN, 55435 United States	Electronic Service		No	M-25-141
213	Dean	Pawlowski	dpawlowski@otpc.com	Otter Tail Power Company		PO Box 496 215 S, Cascade St. Fergus Falls MN, 56537-0496 United States	Electronic Service		No	M-25-141

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
214	Susan	Peirce	susan.peirce@state.mn.us		Department of Commerce	85 Seventh Place East St. Paul MN, 55101 United States	Electronic Service		No	M-25-141
215	Mary Beth	Peranteau	mperanteau@fredlaw.com	Fredrikson & Byron, P.A.		44 East Mifflin Street Suite 1000 Madison WI, 53703 United States	Electronic Service		No	M-25-141
216	Jennifer	Peterson	jjpeterson@mnpower.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	M-25-141
217	Wess	Pfaff	wes.pfaff@mrenergy.com			null null, null United States	Electronic Service		No	M-25-141
218	Ryan	Pierce	ryan.m.pierce@xcelenergy.com	Xcel Energy		null null, null United States	Electronic Service		No	M-25-141
219	Morgan	Pitz	morgan.pitz@us-solar.com	US Solar		100 N 6th St #410B Minneapolis MN, 55403 United States	Electronic Service		No	M-25-141
220	Hannah	Polikov	hpolikov@aee.net	Advanced Energy Economy Institute		1000 Vermont Ave, Third Floor Washington DC, 20005 United States	Electronic Service		No	M-25-141
221	Crystal	Pomerleau	crystal.r.pomerleau@xcelenergy.com	Xcel		null null, null United States	Electronic Service		No	M-25-141
222	Kristel	Porter	kristel@mnrenewablenow.org	MN Renewable Now		null null, null United States	Electronic Service		No	M-25-141
223	Paula	Prahl	paula.prahl@dominiuminc.com	Dominium		2905 Northwest Blvd Ste 150 Plymouth MN, 55441 United States	Electronic Service		No	M-25-141
224	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-25-141
225	Matt	Privratsky	matt@nokomisenergy.com	Nokomis Energy		2639 Nicollet Ave Suite 200 Minneapolis MN, 55408 United States	Electronic Service		No	M-25-141
226	Elizabeth	Psihos	elizabeth.psihos@idealenergies.com			null null, null United States	Electronic Service		No	M-25-141
227	Bridget	Rathsack	bridget.rathsack@burnsvillemn.gov	City of Burnsville, MN		100 Civic Center Parkway Burnsville MN, 55337 United States	Electronic Service		No	M-25-141
228	Peter	Reese	preese@sundialsolarenergy.com	Sundial Energy, LLC		3363 Republic Ave Saint Louis Park MN, 55426 United States	Electronic Service		No	M-25-141
229	Generic Notice	Regulatory	regulatory_filing_coordinators@otpc.com	Otter Tail Power Company		215 S. Cascade Street Fergus Falls	Electronic Service		No	M-25-141

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						MN, 56537 United States				
230	John C.	Reinhardt		Laura A. Reinhardt		3552 26th Ave S Minneapolis MN, 55406 United States	Paper Service		No	M-25-141
231	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-25-141
232	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-25-141
233	Micah	Revell	micah.revell@stinson.com	Stinson LLP		50 South Sixth St Ste 2600 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-141
234	Michael	Riewer	mriewer@otpc.com	Otter Tail Power Company		PO Box 4496 Fergus Falls MN, 56538-0496 United States	Electronic Service		No	M-25-141
235	Jonathan	Roberts	jroberts@softage.com	Softage		66 York St 5th Floor Jersey City NJ, 07302 United States	Electronic Service		No	M-25-141
236	Noah	Roberts	nroberts@cleanpower.org	Energy Storage Association		1155 15th St NW, Ste 500 Washington DC, 20005 United States	Electronic Service		No	M-25-141
237	Kristi	Robinson	krobinson@star-energy.com	STAR Energy Services, LLC		1401 South Broadway Pelican Rapids MN, 56572 United States	Electronic Service		No	M-25-141
238	Daniel	Rogers	dan@nokomispartners.com			2639 Nicollet Ave Ste 200 Minneapolis MN, 55408 United States	Electronic Service		No	M-25-141
239	Michael	Ruiz	michael.ruiz@xcelenergy.com	Xcel Energy		null null, null United States	Electronic Service		No	M-25-141
240	Nathaniel	Runke	nrunke@local49.org			611 28th St. NW Rochester MN, 55901 United States	Electronic Service		No	M-25-141
241	Darla	Ruschen	d.ruschen@bcrea.coop	Brown County Rural Electrical Association		PO Box 529 24386 State Highway 4 Sleepy Eye MN, 56085 United States	Electronic Service		No	M-25-141
242	Delaney	Russell	delaney@mnipl.org	Just Solar Coalition		4407 E Lake Street Minneapolis MN, 55407 United States	Electronic Service		No	M-25-141
243	Kwadwo	Safo	ksafo@dakotaelectric.com	Dakota Electric Association		null null, null United States	Electronic Service		No	M-25-141

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
244	Robert K.	Sahr	bsahr@eastriver.coop	East River Electric Power Cooperative		P.O. Box 227 Madison SD, 57042 United States	Electronic Service		No	M-25-141
245	Ian	SantosMeeker	ians@ips-solar.com	IPS Solar		null null, null United States	Electronic Service		No	M-25-141
246	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-25-141
247	Elena	Saxonhouse	elena.saxonhouse@sierraclub.org	Sierra Club Environmental Law Program		2101 Webster St Ste 1300 Oakland CA, 94612 United States	Electronic Service		No	M-25-141
248	Kenric	Scheevel	kjs@dairynet.com	Dairyland Power Cooperative		3200 East Ave S PO Box 817 La Crosse WI, 54602 United States	Electronic Service		No	M-25-141
249	Dean	Schiro	dean.e.schiro@xcelenergy.com	Xcel Energy		null null, null United States	Electronic Service		No	M-25-141
250	Jacob J.	Schlesinger	jschlesinger@keyesfox.com	Keyes & Fox LLP		1580 Lincoln St Ste 880 Denver CO, 80203 United States	Electronic Service		No	M-25-141
251	Jeff	Schoenecker	jschoenecker@dakotaelectric.com	Dakota Electric Association		4300 220th Street W Farmington MN, 55024 United States	Electronic Service		No	M-25-141
252	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-25-141
253	Kay	Schraeder	kschraeder@minnkota.com	Minnkota Power		5301 32nd Ave S Grand Forks ND, 58201 United States	Electronic Service		No	M-25-141
254	Matthew	Schuerger	matthew.schuerger@state.mn.us		Public Utilities Commission	121 7th Place East Suite 350 St. Paul MN, 55101 United States	Electronic Service		No	M-25-141
255	Ronald J.	Schwartau	rschwartau@noblesce.com	Nobles Electric Cooperative		22636 U.S. Hwy. 59 Worthington MN, 56187 United States	Electronic Service		No	M-25-141
256	Rob	Scott Hovland	rob.scott-hovland@mrenergy.com	Missouri River Energy Services		3724 W Avera Dr PO Box 88920 Sioux Falls SD, 57109-8920 United States	Electronic Service		No	M-25-141
257	Emma	Searson	esearson@solarunitedneighbors.org	Solar United Neighbors		646 S Barrington Ave Apt 101 Los Angeles CA, 90049 United States	Electronic Service		No	M-25-141
258	Dean	Sedgwick	sedgwick@itascapower.com	Itasca Power Company		PO Box 455 Spring Lake MN, 56680 United States	Electronic Service		No	M-25-141

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
259	Maria	Seidler	maria.seidler@dom.com	Dominion Energy Technology		120 Tredegar Street Richmond VA, 23219 United States	Electronic Service		No	M-25-141
260	David	Shaffer	david.shaffer@novelenergy.biz	Novel Energy Solutions		2303 Wycliff St Ste 300 St. Paul MN, 55114 United States	Electronic Service		No	M-25-141
261	Patricia	Sharkey	psharkey@environmentallawcounsel.com	Midwest Cogeneration Association.		180 N LaSalle St Ste 3700 Chicago IL, 60601 United States	Electronic Service		No	M-25-141
262	Christopher L.	Sherman	csherman@sherman-associates.com	Solar Holdings LLC		233 Park Ave S Ste 201 Minneapolis MN, 55415 United States	Electronic Service		No	M-25-141
263	Doug	Shoemaker	dougs@charter.net	Minnesota Renewable Energy		2928 5th Ave S Minneapolis MN, 55408 United States	Electronic Service		No	M-25-141
264	Felicia	Skaggs	fskaggs@meeker.coop	Meeker Cooperative Light & Power		1725 US Highway 12 E Suite 100 Litchfield MN, 55355 United States	Electronic Service		No	M-25-141
265	Glen	Skarbakka	glen@s-pllc.com	Skarbakka PLLC		5411 Bartlett Blvd Mound MN, 55364 United States	Electronic Service		No	M-25-141
266	Anne	Smart	anne.smart@chargepoint.com	ChargePoint, Inc.		254 E Hacienda Ave Campbell CA, 95008 United States	Electronic Service		No	M-25-141
267	Joshua	Smith	joshua.smith@sierraclub.org			85 Second St FL 2 San Francisco CA, 94105 United States	Electronic Service		No	M-25-141
268	Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.		76 W Kellogg Blvd St. Paul MN, 55102 United States	Electronic Service		No	M-25-141
269	Trevor	Smith	trevor.smith@avantenergy.com	Avant Energy, Inc.		220 South Sixth Street Suite 1300 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-141
270	Rafi	Sohail	rafi.sohail@centerpointenergy.com	CenterPoint Energy		800 LaSalle Avenue P.O. Box 59038 Minneapolis MN, 55459-0038 United States	Electronic Service		No	M-25-141
271	Beth	Soholt	bsoholt@cleangridalliance.org	Clean Grid Alliance		570 Asbury Street Suite 201 St. Paul MN, 55104 United States	Electronic Service		No	M-25-141
272	Marcia	Solie	m.solie@bcrea.coop	Brown County Rural Electrical Association		24386 State Hwy. 4, PO Box 529 Sleepy Eye MN, 56085 United States	Electronic Service		No	M-25-141

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
273	Braden	Solum	braden.solum@idealenergies.com	iDEAL Energies		5810 Nicollet Ave Minneapolis MN, 55419 United States	Electronic Service		No	M-25-141
274	Karl	Sonneman	karl17@hbc.com	Law Office of Karl W. Sonneman		111 Riverfront Suite 202 Winona MN, 55987 United States	Electronic Service		No	M-25-141
275	Brandon	Stamp	brandon.j.stamp@xcelenergy.com	Xcel Energy		401 Nicollet Mall Minneapolis MN, 55401 United States	Electronic Service		No	M-25-141
276	Sky	Stanfield	stanfield@smwlaw.com	Shute, Mihaly & Weinberger		396 Hayes Street San Francisco CA, 94102 United States	Electronic Service		No	M-25-141
277	Russ	Stark	russ.stark@ci.stpaul.mn.us	City of St. Paul		Mayor's Office 15 W. Kellogg Blvd., Suite 390 Saint Paul MN, 55102 United States	Electronic Service		No	M-25-141
278	Byron E.	Starns	byron.starns@stinson.com	STINSON LLP		50 S 6th St Ste 2600 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-141
279	Kristin	Stastny	kstastny@taftlaw.com	Taft Stettinius & Hollister LLP		2200 IDS Center 80 South 8th Street Minneapolis MN, 55402 United States	Electronic Service		No	M-25-141
280	Lindsey	Stegall	lindsey.stegall@evgo.com	EVgo Services, LLC		11835 W Olympic Blvd Ste 900E Los Angeles CA, 90064 United States	Electronic Service		No	M-25-141
281	Cary	Stephenson	cstephenson@otpc.com	Otter Tail Power Company		215 South Cascade Street Fergus Falls MN, 56537 United States	Electronic Service		No	M-25-141
282	Chad	Stevenson	chad.stevenson@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	445 Minnesota St. Suite 1400 St. Paul MN, 55101 United States	Electronic Service		No	M-25-141
283	Tammy	Sundbom	tsundbom@mnpower.com	Minnesota Power		null null, null United States	Electronic Service		No	M-25-141
284	Sherry	Swanson	sswanson@noblesce.com	Nobles Cooperative Electric		PO Box 58 Slayton MN, 56172 United States	Electronic Service		No	M-25-141
285	Boratha	Tan	btan@votesolar.org	Vote Solar		null null, null United States	Electronic Service		No	M-25-141
286	Bryant	Tauer	btauer@whe.org	Wright-Hennepin		6800 Electric Dr Rockford MN, 55373 United States	Electronic Service		No	M-25-141
287	Dean	Taylor	dtaylor@pluginamerica.org	Plug In America		6380 Wilshire Blvd, Suite 1000 Los Angeles CA, 90048 United States	Electronic Service		No	M-25-141

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
288	Whitney	Terrill	whitney@mnipl.org	Minnesota Interfaith Power & Light		null null, null United States	Electronic Service		No	M-25-141
289	Daniel	Tikk	daniel.tikk@state.mn.us		Department of Commerce	85 7th Place East Suite 280 Saint Paul MN, 55101 United States	Electronic Service		No	M-25-141
290	Kate	Tohme	ktohme@newleafenergy.com	New Leaf Energy		null null, null United States	Electronic Service		No	M-25-141
291	Taige	Tople	taige.d.tople@xcelenergy.com	Northern States Power Company dba Xcel Energy-Elec		414 Nicollet Mall 401 7th Floor Minneapolis MN, 55401 United States	Electronic Service		No	M-25-141
292	Jason	Topp	jason.topp@lumen.com	Qwest Communications Company, LLC.		200 S 5th St Ste 2200 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-141
293	Emma Marshall	Torres	emarshall-torres@convergentep.com			null null, null United States	Electronic Service		No	M-25-141
294	Zack	Townsend	zachary.townsend@brookfieldrenewable.com	Brookfield Renewable		200 Liberty St FL 14 New York NY, 10281 United States	Electronic Service		No	M-25-141
295	Pat	Treseler	pat.jcplaw@comcast.net	Paulson Law Office LTD		4445 W 77th Street Suite 224 Edina MN, 55435 United States	Electronic Service		No	M-25-141
296	Jeff	Triplett	triplettj@powersystem.org	MREA		10710 Town Square Dr NW St 201 Minneapolis MN, 55449 United States	Electronic Service		No	M-25-141
297	Adam	Tromblay	atromblay@noblesce.com	Nobles Cooperative Electric		P.O. Box 58 Slayton MN, 56127-0058 United States	Electronic Service		No	M-25-141
298	Lise	Trudeau	lise.trudeau@state.mn.us		Department of Commerce	85 7th Place East Suite 500 Saint Paul MN, 55101 United States	Electronic Service		No	M-25-141
299	Alan	Urban	alan.m.urban@xcelenergy.com	Xcel Energy		null null, null United States	Electronic Service		No	M-25-141
300	Matt	Van Arkel	mvanarkel@newleafenergy.com			55 Technology Drive Suite 102 Lowell MA, 01851 United States	Electronic Service		No	M-25-141
301	Gary	Van Winkle	gvanwinkle@mylegalaid.org	Mid-Minnesota Legal Aid		111 N Fifth St Ste 100 Minneapolis MN, 55403 United States	Electronic Service		No	M-25-141
302	John	Vaughn	nik@rreal.org	Rural Renewable Energy Alliance		3963 8th Street SW Backus MN, 55435 United States	Electronic Service		No	M-25-141
303	Ellen	Veazey	lveazey@solarunitedneighbors.org	Solar United Neighbors		1350 Connecticut Ave NW Ste 412	Electronic Service		No	M-25-141

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						Washington DC, 20036 United States				
304	Sam	Villella	sdvillella@gmail.com			10534 Alamo Street NE Blaine MN, 55449 United States	Electronic Service		No	M-25-141
305	Curt	Volkman	curt@newenergy-advisors.com	Fresh Energy		408 St Peter St Saint Paul MN, 55102 United States	Electronic Service		No	M-25-141
306	Wendy	Vorasane	wendy.vorasane@idealenergies.com			null null, null United States	Electronic Service		No	M-25-141
307	Robert J.V.	Vose	rvose@kennedy-graven.com	Kennedy & Graven, Chartered		150 S 5th St Ste 700 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-141
308	Stacy	Wahlund	swahlund@otpc.com	Otter Tail Power Company		215 S. Cascade St Fergus Falls MN, 56537 United States	Electronic Service		No	M-25-141
309	Sarah	Wallinga	swallinga@solarcity.com	Energy Freedom Coalition		3055 Clearview Way San Mateo MN, 94402 United States	Electronic Service		No	M-25-141
310	Kevin	Walker	kwalker@beaconinterfaith.org	Beacon Interfaith Housing Collaborative		null null, null United States	Electronic Service		No	M-25-141
311	Roger	Warehime	roger.warehime@owatonnautilities.com	Owatonna Municipal Public Utilities - Gas		208 S Walnut Ave PO BOX 800 Owatonna MN, 55060 United States	Electronic Service		No	M-25-141
312	Jenna	Warmuth	jwarmuth@mnpower.com	Minnesota Power		30 W Superior St Duluth MN, 55802-2093 United States	Electronic Service		No	M-25-141
313	Samantha	Weaver	samantha@communitysolaraccess.org	Coalition for Community Solar Access		1380 Monroe St. Washington DC DC, 20010 United States	Electronic Service		No	M-25-141
314	Elizabeth	Wefel	eawefel@flaherty-hood.com	Missouri River Energy Services		525 Park St Ste 470 Saint Paul MN, 55103 United States	Electronic Service		No	M-25-141
315	Sarah	Whebbe	swhebbe@mnseia.org	MnSEIA		445 Minnesota Street Suite 730 St. Paul MN, 55101 United States	Electronic Service		No	M-25-141
316	Joshua	Williams	joshua@highlandfleets.com	Highland Electric Fleets		200 Cummings Center Suite 273-D Beverly MA, 01915 United States	Electronic Service		No	M-25-141
317	Laurie	Williams	laurie.williams@sierradlub.org	Sierra Club		Environmental Law Program 1536 Wynkoop St Ste 200 Denver CO,	Electronic Service		No	M-25-141

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						80202 United States				
318	John	Williamson	john.williamson@state.mn.us	Minnesota Department of Labor and Industry		443 Lafayette Rd N St. Paul MN, 55155-4341 United States	Electronic Service		No	M-25-141
319	Anthony	Willingham	anthony.willingham@electrifyamerica.com	Electrify America		1950 Opportunity Way Suite 1500 Reston VA, 20190 United States	Electronic Service		No	M-25-141
320	Danielle	Winner	danielle.winner@state.mn.us		Department of Commerce	85 7th Place East Suite 500 Saint Paul MN, 55101 United States	Electronic Service		No	M-25-141
321	Heidi	Winter	hwinter@co.murray.mn.us	Murray County		2500 28th Street PO Box 57 Slayton MN, 56172 United States	Electronic Service		No	M-25-141
322	Robyn	Woeste	robynwoeste@alliantenergy.com	Interstate Power and Light Company		200 First St SE Cedar Rapids IA, 52401 United States	Electronic Service		No	M-25-141
323	Terry	Wolf	terry.wolf@mrenergy.com	Missouri River Energy Services		3724 W Avera Dr PO Box Sioux Falls SD, 57109-8920 United States	Electronic Service		No	M-25-141
324	Curtis	Zaun	curtis@cpzlaw.com			3254 Rice Street Little Canada MN, 55126 United States	Electronic Service		No	M-25-141
325	Brian	Zavesky	brianz@mrenergy.com	Missouri River Energy Services		3724 West Avera Drive P.O. Box 88920 Sioux Falls SD, 57108-8920 United States	Electronic Service		No	M-25-141
326	Christopher	Zibart	czibart@atcllc.com	American Transmission Company LLC		W234 N2000 Ridgeview Pkwy Court Waukesha WI, 53188-1022 United States	Electronic Service		No	M-25-141
327	Kurt	Zimmerman	kwz@ibew160.org	Local Union #160, IBEW		2909 Anthony Ln St Anthony Village MN, 55418-3238 United States	Electronic Service		No	M-25-141
328	Emily	Ziring	eziring@stlouispark.org	City of St. Louis Park		5005 Minnetonka Blvd St. Louis Park MN, 55416 United States	Electronic Service		No	M-25-141
329	Ari	Zwick	ari.zwick@state.mn.us		Department of Commerce	85 7th Place East Suite 280 Saint Paul MN, 55101 United States	Electronic Service		No	M-25-141