

October 13, 2025

**VIA ELECTRONIC FILING**

Sasha Bergman, Executive Secretary  
Minnesota Public Utilities Commission  
121 East Seventh Place, Suite 350  
Saint Paul, MN 55101

**Re: In the Matter of Northern States Power Co.'s d/b/a Xcel Energy's, Petition for Approval of Large General Time of Day Service and Large Peak Controlled Time of Day Service Tariffs;  
MPUC Docket No. E-002/M-25-289**

Dear Ms. Bergman:

Please find attached for filing with the Minnesota Public Utilities Commission ("Commission") the Comments of CloudHQ LLC in the above-referenced case.

Please contact me if you have any questions.

Sincerely,

SPILMAN THOMAS & BATTLE, PLLC

By /s/ Carrie H. Grundmann  
Carrie H. Grundmann  
(NC Bar No. 52711)

*Counsel to CloudHQ LLC*

CMH:sds  
Attachments  
cc: Certificate of Service

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

Katie Sieben  
Hwikwon Ham  
Audrey Partridge  
Joseph K. Sullivan  
John Tuma

Chair  
Commissioner  
Commissioner  
Commissioner  
Commissioner

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In the Matter of Northern States Power Co.'s  
d/b/a Xcel Energy's, Petition for Approval of  
Large General Time of Day Service and Large  
Peak Controlled Time of Day Service Tariffs

MPUC Docket No. E-002/M-25-289

**COMMENTS OF  
CLOUDHQ LLC**

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**I. INTRODUCTION**

CloudHQ LLC ("CloudHQ") respectfully submits these comments in response to the Notice of Extended Comment Period ("Notice") issued by the Minnesota Public Utilities Commission ("Commission") regarding the petition of Northern States Power Company, d/b/a Xcel Energy ("Company" or "Xcel") for approval of new sub-classes and tariffs for new large loads taking service under the Large General Time of Day Service ("LG-TODS") tariff or the Large Peak Controlled Time of Day Service tariff (the "Petition"). The Company's Petition is in response to the Commission's Order requiring the Company to make a filing for a new rate class or sub-class and tariff for super-large customers.<sup>1</sup>

CloudHQ is a global data center company that partners with the world's largest technology companies to provide reliable and secure power and operating infrastructure, and its affiliates own and operate data centers across the world. As the Company's Petition notes, data centers – such as the ones developed by CloudHQ – bring numerous benefits to a jurisdiction, including substantial

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<sup>1</sup> *In the Matter of Xcel Energy's 2024-2024 Upper Midwest Integrated Resource Plan*, Docket No. E002/RP-24-67, and *In the Matter of Xcel Energy's Competitive Resource Acquisition Process for up to 800 Megawatts of Firm Dispatchable Generation*, Docket No. E002/CN-23-212, ORDER APPROVING SETTLEMENT AGREEMENT WITH MODIFICATIONS (issued April 21, 2025), p. 25.

revenues that can offset existing system costs, grid stability, and tax revenues, as well as other economic benefits like job creation and infrastructure investment.<sup>2</sup> While the Company asserts that the purpose of the proposals in its Petition is intended to attract large loads like data centers,<sup>3</sup> many of the specific contractual terms will have a chilling effect on development.<sup>4</sup> Indeed, CloudHQ provides these comments to address the specific terms and conditions that are likely to negatively and materially impact CloudHQ's operations and the services they provide to data center customers. If the terms set forth in the Company's Petition are approved as written, CloudHQ believes that it could have the effect of chilling, not promoting, data center and other large load development in the Company's service territory.

## **II. SUMMARY OF THE COMPANY'S PROPOSED TARIFFS**

The Company's Petition proposes a new tariff applicable to new or existing LG-TODS customers with new electric demand of 100 MW or greater that begin service after the effective date of the tariff proposed in this case.<sup>5</sup> Some of the primary contractual terms applicable to these customers include:

- A default initial contract term under an Electric Service Agreement ("ESA") of at least 15 years; however, the Company also allows for negotiation of the ESA term length.<sup>6</sup>
- The ESA would impose Exit Fees and/or penalties on large customers who seek to reduce their demand from the amount stated in their contract and/or terminate their ESA, which is calculated based on 75 percent of the then-current effective demand charge multiplied by 10 years or the remaining term of the ESA.<sup>7</sup> These fees are due in a lump sum within 30 days of the termination and/or reduction.<sup>8</sup>
- The Company proposes to design rates for these customers in a way that differs from its methodology for designing rates for other customers classes, creating a situation

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<sup>2</sup> Petition, p. 2.

<sup>3</sup> Attracting data centers to Minnesota is also consistent with the state's public policy as reflected in the recent legislation signed in to law by Governor Walz on June 14, 2025. *See* Petition at p. 6.

<sup>4</sup> Petition, p. 2.

<sup>5</sup> Petition, p. 10.

<sup>6</sup> Petition, p. 10.

<sup>7</sup> Petition, p. 11.

<sup>8</sup> Attachment G at pp. 9-10, § 16.2 (Contract Capacity Reduction Payment) and p. 10, § 16.3 (Exit Fee).

where "more cost recovery [occurs] through demand charges and less cost recovery from energy charges."<sup>9</sup> The purpose of this rate design is to create a "higher and more reasonable basis by which the Company can assess capacity reduction and exit fees."<sup>10</sup>

- Customers will be required to provide sufficient security and collateral equal to fifty percent (50%) of the contract capacity multiplied by the then-current effective Tariff firm or on-peak demand charges multiplied by the term of the ESA.<sup>11</sup> The tariff requires the posting of a guaranty, which is identified in the tariff as a "parent guaranty" only,<sup>12</sup> which can only come from an entity that is (i) a U.S. domiciled entity; (ii) with a cash balance of three billion dollars or more or a credit rating equal or better to BBB- from S&P or Baa3 from Moody's.<sup>13</sup> Alternatively, if the guaranty provisions cannot be satisfied, then the customer can provide a cash deposit, letter of credit, surety bond, or other credit support reasonably acceptable to the Company.<sup>14</sup>
- The Company will impose a minimum bill equal to the greater of (i) on-peak period demand to be billed; or (ii) 75 percent of the customer's contract capacity.<sup>15</sup>

### **III. COMMENTS ON PROPOSED TARIFFS**

While the summary above identified numerous elements of the Company's proposal, these Comments focus on the following aspects of the proposed tariff and contract terms: (1) the financial security or collateral requirements and the accepted forms of meeting them; (2) the minimum demand charges, including how demand is calculated for purposes of rate design; and (3) the Company's proposal for calculating and collecting exit fees and/or contract capacity reduction payments. CloudHQ is concerned that as proposed, these tariff provisions will deter data centers and data center developers, like CloudHQ, from bringing data centers to the Company's service territory, which would be inconsistent with Minnesota public policy and the Company's and the Commission's "vision to attract, equitably integrate, and serve new large load customers."<sup>16</sup>

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<sup>9</sup> Petition, p. 11.

<sup>10</sup> *Id.*

<sup>11</sup> Attachment G at p. 17.

<sup>12</sup> *See* Attachment G at Exhibit G.

<sup>13</sup> Attachment G, pp. 7-8.

<sup>14</sup> Attachment G, p. 8 at § 14.1.

<sup>15</sup> Petition, p. 14; Attachment G, pp. 3-4.

<sup>16</sup> Petition, p. 1.

## A. Financial Security and Collateral Provisions

The Petition provides that the ESA required for a large load customer to take service under LG-TODS will:

[C]ontain sufficient security and collateral provisions (*e.g.*, parent guarantee, letter of credit) to support enforcement of the tariff provisions. Because each individual customer's credit and financial situation will differ from another's, the specific terms addressing risk mitigation and security will be captured in the Large General Time of Day Service customer's ESA and provided for Commission review. The Retail Customer Form ESA, provided as Attachment G to this Petition, however, contains examples of the types of security and risk mitigation measures that will be considered.<sup>17</sup>

As described above and as set forth in Attachment G to the Petition, the preferred method for providing such security is in the form of a guaranty. It appears that the Company only contemplates that a parent could provide such guarantee and fails to contemplate a guarantee from an acceptable third-party, for example, a customer of CloudHQ. Provided the guarantor satisfies the Company's metrics (domiciled in the U.S. and with sufficient cash on-hand or a high enough credit rating), the Company should be indifferent to the relationship between the customer and the guarantor. By limiting the guaranty to only a parental guaranty, the Company is unreasonably restricting CloudHQ's and other potential large load customers' ability to satisfy collateral requirements, particularly when other financially interested third-party guarantees can just as effectively reduce risk for the Company and its customers.

Other jurisdictions have dealt with this issue. For example, in July 2025, the Public Utilities Commission of Ohio ("PUCO") issued an Order that adopted one of two competing stipulations to resolve how to address data center load in AEP Ohio's service territory.<sup>18</sup> The PUCO accepted all aspects of the stipulation supported by the utility and commission staff *except* it modified the

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<sup>17</sup> Petition, p. 13.

<sup>18</sup> *In the Matter of the Application of Ohio Power Co. for New Tariffs Related to Data Centers and Mobile Data Centers*, Case No. 24-0508-EL-ATA, Opinion and Order, (issued July 9, 2025).

collateral requirements, specifically allowing third-party guarantors to meet the required credit ratings and liquidity thresholds.<sup>19</sup> CloudHQ requests that the Commission take a similar approach and clarify that the financial security and collateral requirements need not be limited to parental guarantees but may also be satisfied by the guaranty from a credit-worthy third-party.

### **B. Minimum Demand Charges and the Rate Design**

The Petition provides for a minimum billing demand for customers taking service under either tariff that is at least 75 percent of the customer's contract capacity for the full term of the ESA.<sup>20</sup> Moreover, the Company has purposely designed rates to increase the amount of charges recovered through a demand charge. CloudHQ has multiple concerns with these proposals.

The rate design methodology proposed by the Company appears to be specific to these large customers and is inconsistent with cost causation. As set forth in the Petition, the Company admits that it is proposing to design rates atypically from how it designs rates for the "Demand Billed Class."<sup>21</sup> The Company does not do this for a cost-based reason. Instead, the Company does this to increase the amounts charged through a demand charge *specifically* to increase the amount it can collect through the minimum demand charge, exit fees, and capacity reduction charges. Singling this class of customers out for a punitive rate design is not only discriminatory, but it is inconsistent with the Company's practice and cost of service ratemaking.

CloudHQ also has concerns with the 75 percent minimum demand charge proposed by Xcel. The Company offers no justification for its selection of a 75 percent contract minimum demand charge. CloudHQ understands and supports the need (and indeed, the statutory requirement) to protect other customers and the Company by ensuring that the load under contract

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<sup>19</sup> *In the Matter of the Application of Ohio Power Co. for New Tariffs Related to Data Centers and Mobile Data Centers*, Case No. 24-0508-EL-ATA, Opinion and Order, (issued July 9, 2025), p. 25.

<sup>20</sup> Petition, pp. 14, 25.

<sup>21</sup> Petition, p. 12.

appears, but the minimum demands should not be set so high as to discourage development. CloudHQ is concerned that such a high minimum billing demand charge, particularly when coupled with the punitive rate design proposed by the Company, will disincentivize new large load customers from bringing their business to the Company's service territory. If large load fails to materialize, it is possible that the Company and the State of Minnesota will miss the opportunity to attract such large customers and realize all the benefits the Company acknowledges these customers bring to the system.

CloudHQ recommends instead that the Commission set the minimum billing demand equal to sixty percent (60%) of the customer's contract capacity. A sixty percent (60%) minimum demand charge guarantees substantial revenues to the Company. At the same time, the Commission and other stakeholders will have the flexibility to reevaluate that minimum demand level in future proceedings to determine if an adjustment upward is warranted. Setting a lower demand threshold now with the potential for increasing it later is better than trying to lower the demand charges when it becomes clear that onerous ESA terms stifled or prevented large load customers from coming to Minnesota. As such, CloudHQ recommends that the Commission require the Company set the minimum demand charge equal to 60 percent (60%) of the customer's contract capacity.

### **C. Contract Capacity Reductions**

The Company's proposal permits a large customer to reduce its contract capacity by providing 12 months' notice to the Company and paying a capacity reduction fee ("Capacity Reduction Fee").<sup>22</sup> The Capacity Reduction Fee is calculated based on (i) the amount of the capacity reduction; (ii) multiplied by the tariff rate for peak demand charges; (iii) multiplied by 75

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<sup>22</sup> Attachment G, pp. 8-9, § 16.2.

percent (75%); (iv) multiplied by the lesser of the remaining term of the ESA or 120 months.<sup>23</sup> The Capacity Reduction Fee is due as a lump sum within 30 days of the date capacity is reduced.<sup>24</sup> CloudHQ is concerned that the proposal allows for no voluntary capacity reductions without triggering the Capacity Reduction Fee as well as the requirement that the fee be paid within 30 days of the date capacity is reduced.

Under the Company's proposal, there are no circumstances under which the customer can reduce its capacity without triggering the Capacity Reduction Fee. Indeed, this penalty is triggered regardless of whether there would be any stranded costs. Nor is any allowance made to allow a customer to avoid the penalty, if for example, a new off-taker was identified.<sup>25</sup> Not only does such a restrictive provision ignore business realities, but it is dissimilar from numerous large load tariffs proposed and/or approved around the country.<sup>26</sup> To address its concerns, CloudHQ makes two recommendations below.

First, CloudHQ recommends that the Commission require the Company to permit a level of capacity reduction without triggering the Capacity Reduction Fee. Business needs change, and despite an entity's best efforts to ascertain its power needs, such estimates may not be perfect. CloudHQ thus recommends that a customer be permitted to reduce its capacity by some amount,

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<sup>23</sup> *Id.*

<sup>24</sup> *Id.*

<sup>25</sup> The Company proposes to always charge the Capacity Reduction Fee, but to provide mitigation payments if monies are received that would mitigate the Capacity Reduction Fee. *See* Attachment G at p. 9, § 16.4.

<sup>26</sup> *See Appalachian Power Co. and Wheeling Power Co. Application for approval of revisions to Schedules LCP and IP*, Case No. 24-0611-E-T-PW, Commission Order (issued March 25, 2025), p. 2; *Petition of Appalachian Power Co. for approval of Revisions to the Terms and Conditions of Rate Schedule L.P.S.*, Case No. PUR-2025-00057, Direct Testimony of William K. Castle, p. 10, lines 6-28 (proposing terms that would allow a customer to reduce its contract capacity by twenty percent (20%) without a fee); *Application of Virginia Electric and Power Co. for a 2025 biennial review of the rates, terms and conditions for the provision of generation, distribution and transmission services pursuant to § 56-585.1 A of the Code of Virginia*, Case No. PUR-2025-00058, Direct Testimony of Stan Blackwell, p. 20, lines 10-12 (discussing utility's proposal to allow a one-time election to reduce contracted capacity by twenty percent (20%) without penalty); and *In the Matter of the Application of Ohio Power Co. for New Tariffs Related to Data Centers and Mobile Data Centers*, Case No. 24-0508-EL-ATA, Opinion and Order, (issued July 9, 2025), p.18.

which CloudHQ recommends be set at 20 percent (20%), without triggering the Capacity Reduction Fee.

Second, the Company should allow some flexibility as to the trigger for when full payment of the Capacity Reduction Fee is due. For example, if as of the reduction date, the customer and/or the Company are in active negotiations with a potential off-taker or other mitigation measure, it would not make sense for the customer to fully pay the Capacity Reduction Fee only for it to be returned at a later date. Instead, the customer should be permitted a bridge-type period of up to 12-months where it can pay the monthly minimums rather than the full Capacity Reduction Fee to facilitate securing such off-taker or other mitigation measure. Then, if an off-taker or mitigation is not obtained within the bridge period, then the full capacity reduction fee less the 12 months paid during the bridge period would be due and owing.

#### **D. Exits Fees**

Similar to the Capacity Reduction Fee, the Company also proposes terms in the event a customer sought to terminate its ESA prior to the expiration of the contract term. For a contract termination, the Company requires at least 24 months' notice and payment of an exit fee that is designed to recover the loss of revenues associated with the customer's minimum demand and the remainder of the incremental generation costs attributable to connecting and serving the customer.<sup>27</sup> The Exit Fee is calculated similarly to the Capacity Reduction Fee; namely, the fee is calculated based on (i) the then-current effective demand charges; (ii) multiplied by 75 percent (75%); (iii) multiplied by the lesser period of ten years or the remainder of the ESA term.<sup>28</sup>

While CloudHQ understands and respects the need for customer protections, it believes that the Exit Fee as proposed is unreasonable. The proposed tariff contemplates that the customer

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<sup>27</sup> Petition, p. 11.

<sup>28</sup> Petition, p. 11.

will pay the Exit Fee as a lump sum payment within 30 days of termination.<sup>29</sup> While CloudHQ appreciates that the Company provides a provision for mitigation efforts that could result in annual remittance to the customer,<sup>30</sup> CloudHQ believes there should be some flexibility – much like CloudHQ's proposed revisions to the Capacity Reduction Fee – that would allow a customer to avoid the entire payment being due within 30 days of termination if there is a near-term potential to mitigate those costs. Specifically, CloudHQ would recommend that customers be given the option to elect an additional 12-month bridge period after the end of the 24-month notice period in which the customer would continue to pay the minimum charges while having the opportunity to secure an off-taker or other mitigation measures. If an off-taker or other mitigation had not been identified and secured by the end of the bridge period, then the Exit Fee provision would apply, at the lesser of nine years or the remaining term of the ESA.

For CloudHQ in particular, whom is often serving as the landlord of the location, the bridge period would provide sufficient time to secure an off-taker and make potential retrofits to the facility if necessary. Additionally, this proposal would keep other existing customers in the same position as they already would be because the large load customer would continue paying the required minimum charges.

#### **IV. CONCLUSION**

CloudHQ appreciates the opportunity to participate in this process, and it looks forward to working with the Commission, Company and parties to address the Petition and the appropriate path forward to protect customers and incentivize the development of data centers in Minnesota.

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<sup>29</sup> Attachment G, p. 9.

<sup>30</sup> Attachment G, p. 9.

Respectfully submitted,

SPILMAN THOMAS & BATTLE, PLLC

By /s/ Carrie H. Grundmann

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Dated: October 13, 2025

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

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In the Matter of Northern States Power Co.'s  
d/b/a Xcel Energy's, Petition for Approval of  
Large General Time of Day Service and  
Large Peak Controlled Time of Day Service  
Tariffs

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MPUC Docket No. E-002/M-25-289

**CERTIFICATE OF SERVICE**

I, Carrie H. Grundmann, hereby certify that on the 13<sup>th</sup> day of October, 2025, I e-filed with e-Dockets the attached Comments on CloudHQ LLC and served a true and correct copy of the same upon all parties on the attached service list by email, electronic submission, and/or first-class mail.

*/s/ Carrie H. Grundmann*

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Carrie H. Grundmann

Dated: October 13, 2025

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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	M-25-289
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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	M-25-289
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	M-25-289
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	M-25-289
50	Terri	Finn	terri.goggleye@llojibwe.net			null null, null United States	Electronic Service		No	M-25-289
51	Christine	Fox	cfox@itasca-mantrap.com	Itasca-Mantrap Coop. Electric Assn.		PO Box 192 Park Rapids MN, 56470 United States	Electronic Service		No	M-25-289
52	Lucas	Franco	lfranco@liunagro.com	LIUNA		81 Little Canada Rd E Little Canada MN, 55117 United States	Electronic Service		No	M-25-289

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
53	Gary	Frazer	gfrazier@mnchippewatribe.org	Minnesota Chippewa Tribe		PO Box 217 Cass Lake MN, 56633 United States	Electronic Service		No	M-25-289
54	Stacey	Fujii	sfujii@grenergy.com	Great River Energy		12300 Elm Creek Boulevard Maple Grove MN, 55369-4718 United States	Electronic Service		No	M-25-289
55	Edward	Garvey	garveyed@aol.com	Residence		32 Lawton St Saint Paul MN, 55102 United States	Electronic Service		No	M-25-289
56	Shannon	Geshick	shannon.geshick@state.mn.us	Minnesota Indian Affairs Council (MIAC)		null null, null United States	Electronic Service		No	M-25-289
57	Allen	Gleckner	gleckner@fresh-energy.org	Fresh Energy		408 St. Peter Street Ste 350 Saint Paul MN, 55102 United States	Electronic Service		No	M-25-289
58	Jeffrey	Haase	jhaase@grenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	M-25-289
59	Hal	Halpern	halhalpern@clpower.com	Cooperative Light & Power		1554 Hwy 2 PO Box 69 Two Harbors MN, 55616 United States	Electronic Service		No	M-25-289
60	Jeremy	Hamilton	jhamilton@uppersiouxcommunity-nsn.gov	Upper Sioux Community		Upper Sioux Community PO Box 147 Granite Falls MN, 56241 United States	Electronic Service		No	M-25-289
61	David A.	Hansen	hansen@federatedrea.coop	Federated Rural Electric Association		77100 U.S. Highway 71 PO Box 69 Jackson MN, 56143 United States	Electronic Service		No	M-25-289
62	Amy	Hastings	amyh@uppersiouxcommunity-nsn.gov	Upper Sioux Community		5722 Travers Lane PO Box 147 Granite Falls MN, 56241 United States	Electronic Service		No	M-25-289
63	Erik	Hattlestad	erik@cureriver.org			117 1st St Montevideo MN, 56265 United States	Electronic Service		No	M-25-289
64	Adam	Heinen	aheinen@dakotaelectric.com	Dakota Electric Association		4300 220th St W Farmington MN, 55024 United States	Electronic Service		No	M-25-289
65	Kristin	Henry	kristin.henry@sierraclub.org	Sierra Club		2101 Webster St Ste 1300 Oakland CA, 94612 United States	Electronic Service		No	M-25-289
66	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-25-289

#	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	M-25-289
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	M-25-289
69	John	Ihle	ljihle@rrt.net	PlainStates Energy LLC		27451 S Hwy 34 Barnesville MN, 56514 United States	Electronic Service		No	M-25-289
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	M-25-289
71	Faron	Jackson, Sr.	faron.jackson@llojibwe.net			190 Sailstar Drive NW Cass Lake MN, 56633 United States	Electronic Service		No	M-25-289
72	Justin	Jahnz	justin.jahnz@ecemn.com	East Central Energy		412 Main Ave N Braham MN, 55006 United States	Electronic Service		No	M-25-289
73	Alan	Jenkins	aj@jenkinsatlaw.com	Jenkins at Law		2950 Yellowtail Ave. Marathon FL, 33050 United States	Electronic Service		No	M-25-289
74	Kevin	Jensvold	kevinj@uppersiouxcommunity-nsn.gov	Upper Sioux Community		PO Box 147 Granite Falls MN, 56241-0147 United States	Electronic Service		No	M-25-289
75	Annette	Johnson	annette.johnson@redlakenation.org	Red Lake Nation		15484 Migizi Drive Red Lake MN, 56671 United States	Electronic Service		No	M-25-289
76	Jody	Johnson	jody.johnson@piic.org	Prairie Island Indian Community		5636 Sturgeon Lake Rd Welch MN, 55089 United States	Electronic Service		No	M-25-289
77	Richard	Johnson	rick.johnson@lawmoss.com	Moss & Barnett		150 S. 5th Street Suite 1200 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-289
78	Sarah	Johnson Phillips	sjphillips@stoel.com	Stoel Rives LLP		33 South Sixth Street Suite 4200 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-289
79	Mark	Kaminski	mark.kaminski@gsa.gov	General Services Administration		1800 F Street NW Washington DC, 20405 United States	Electronic Service		No	M-25-289
80	Veda	Kanitz	vmkanitz@gmail.com			null null, null United States	Electronic Service		No	M-25-289

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
81	Jenny	Kartes	jkartes@arrowhead.coop	Arrowhead Electric Cooperative, Inc.(P)		PO Box 39 5401 W Hwy 61 Lutsen MN, 55612 United States	Electronic Service		No	M-25-289
82	David	Kempf	dkempf@grenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	M-25-289
83	William	Kenworthy	will@votesolar.org			1 South Dearborn St Ste 2000 Chicago IL, 60603 United States	Electronic Service		No	M-25-289
84	Bobby	King	bking@solarunitedneighbors.org	Solar United Neighbors		3140 43rd Ave S Minneapolis MN, 55406 United States	Electronic Service		No	M-25-289
85	Therese	LaCanne	tlacanne@grenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	M-25-289
86	Matthew	Lacey	mlacey@grenergy.com	Great River Energy		12300 Elm Creek Boulevard Maple Grove MN, 55369-4718 United States	Electronic Service		No	M-25-289
87	Arthur	LaRose	arthur.larose@llojibwe.net	Leech Lake Band of Ojibwe		190 Sailstar Drive NW Cass Lake MN, 56633 United States	Electronic Service		No	M-25-289
88	Robert L	Larsen	robert.larsen@lowersioux.com	Lower Sioux Indian Community		PO Box 308 39527 Reservation Highway 1 Morton MN, 56270 United States	Electronic Service		No	M-25-289
89	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-25-289
90	Michelle	Larson	michelle@redwingchamber.com	Red Wing Area Chamber of Commerce		439 Main Street Red Wing, MN Bay Point Park MN, 55066 United States	Electronic Service		No	M-25-289
91	Peder	Larson	plarson@larkinhoffman.com	Larkin Hoffman Daly & Lindgren, Ltd.		8300 Norman Center Drive Suite 1000 Bloomington MN, 55437 United States	Electronic Service		No	M-25-289
92	Dan	Leshner	dlesher@grenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	M-25-289
93	Michelle	Lommel	mlommel@grenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	M-25-289

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
94	Kavita	Maini	kmaini@wi.rr.com	KM Energy Consulting, LLC		961 N Lost Woods Rd Oconomowoc WI, 53066 United States	Electronic Service		No	M-25-289
95	Christine	Marquis	regulatory.records@xcelenergy.com	Xcel Energy		414 Nicollet Mall MN1180-07-MCA Minneapolis MN, 55401 United States	Electronic Service		Yes	M-25-289
96	Shena	Matrious	shena.matrious@millelacsband.com	Mille Lacs Band of Ojibwe		43408 Oodena Drive Onamia MN, 56349 United States	Electronic Service		No	M-25-289
97	April	McCormick	aprilm@grandportage.com	Grand Portage Band of Lake Superior Chippewa		PO Box 428 Grand Portage MN, 55605 United States	Electronic Service		No	M-25-289
98	Ronald	Meier	rmeier@mcleodcoop.com	Mcleod Cooperative Power		3515 11th St East Glencoe MN, 55336 United States	Electronic Service		No	M-25-289
99	Peder	Mewis	pmewis@cleangridalliance.org	Clean Grid Alliance		570 Asbury St. St. Paul MN, 55104 United States	Electronic Service		No	M-25-289
100	Valentina	Mgeni	valentina.mgeni@piic.org	Prairie Island Indian Community		Prairie Island Indian Community 5636 Sturgeon Lake Road Welch MN, 55089 United States	Electronic Service		No	M-25-289
101	Cole W.	Miller	cole.miller@shakopeedakota.org	Shakopee Mdewakanton Sioux Community		Shakopee Mdewakanton Sioux Community 2330 Sioux Trail NW Prior Lake MN, 55372 United States	Electronic Service		No	M-25-289
102	Stacy	Miller	stacy.miller@minneapolismn.gov	City of Minneapolis		350 S. 5th Street Room M 301 Minneapolis MN, 55415 United States	Electronic Service		No	M-25-289
103	David	Moeller	dmoeller@allete.com	Minnesota Power			Electronic Service		No	M-25-289
104	Sarah	Mooradian	sarah@curemn.org	CURE		117 South 1st Street Montevideo MN, 56265 United States	Electronic Service		No	M-25-289
105	Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP		33 South Sixth St Ste 4200 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-289
106	Travis	Morrison	travis.morrison@boisforte-nsn.gov	Bois Forte Band of Chippewa		Bois Forte Tribal Government 5344 Lakeshore Drive Nett Lake	Electronic Service		No	M-25-289

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						MN, 55772 United States				
107	David	Morrison, Sr.	david.morrison@boisforte-nsn.gov	Bois Forte Band of Chippewa		Bois Forte Tribal Government 5344 Lakeshore Drive Nett Lake MN, 55772 United States	Electronic Service		No	M-25-289
108	Evan	Mulholland	emulholland@mncenter.org	Minnesota Center for Environmental Advocacy		1919 University Ave W Ste 515 Saint Paul MN, 55101 United States	Electronic Service		No	M-25-289
109	Sonny	Myers	smyers@1854treatyauthority.org	1854 Treaty Authority		4428 Haines Rd Duluth MN, 55811-1524 United States	Electronic Service		No	M-25-289
110	Pouya	Najmaie	najm0001@gmail.com	Cooperative Energy Futures		3416 16th Ave S Minneapolis MN, 55407 United States	Electronic Service		No	M-25-289
111	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-25-289
112	Deb	Nelson	dnelson@greenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	M-25-289
113	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-25-289
114	Duane	Ninneman	duane@cureriver.org	Clean Up the River Environment		117 South 1st St Montevideo MN, 56265 United States	Electronic Service		No	M-25-289
115	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-25-289
116	Joseph	OBrien	joey.obrien@lowersioux.com			39527 Highway 1 Morton MN, 56270 United States	Electronic Service		No	M-25-289
117	Carol A.	Overland	overland@legalelectric.org	Legalelectric - Overland Law Office		1110 West Avenue Red Wing MN, 55066 United States	Electronic Service		No	M-25-289
118	Gregory	Padden	gpadden@greenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	M-25-289
119	Jessica	Palmer Denig	jessica.palmer-denig@state.mn.us		Office of Administrative Hearings	600 Robert St N PO Box 64620 St. Paul MN,	Electronic Service		No	M-25-289

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						55164 United States				
120	Marsha	Parlow	mparlow@grenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	M-25-289
121	Priti	Patel	ppatel@grenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369-4718 United States	Electronic Service		No	M-25-289
122	Earl	Pendleton	earl.pendleton@lowersioux.com	Lower Sioux Indian Community		39527 Highway 1 Morton MN, 56270 United States	Electronic Service		No	M-25-289
123	Gordon	Pietsch	gpietsch@grenergy.com	Great River Energy		12300 Elm Creek Blvd. Maple Grove MN, 55369-4718 United States	Electronic Service		No	M-25-289
124	Joe	Plumer	joe.plumer@redlakenation.org	Red Lake Nation		15484 Migizi Drive Red Lake MN, 56671 United States	Electronic Service		No	M-25-289
125	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-25-289
126	Robert	Prescott	bob.prescott@lowersioux.com	Lower Sioux Indian Community		39527 Highway 1 Morton MN, 56270 United States	Electronic Service		No	M-25-289
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	M-25-289
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	M-25-289
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	M-25-289
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	M-25-289
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	M-25-289

#	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	M-25-289
133	Zachary	Ruzycki	zruzycki@greenergy.com	Great River Energy		12300 Elm Creek Boulevard Maple Grove MN, 55369 United States	Electronic Service		No	M-25-289
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	M-25-289
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	M-25-289
136	Ronald J.	Schwartau	rschwartau@noblesce.com	Nobles Electric Cooperative		22636 U.S. Hwy. 59 Worthington MN, 56187 United States	Electronic Service		No	M-25-289
137	Jessie	Seim	jessie.seim@piic.org	Prairie Island Indian Community		5636 Sturgeon Lake Rd Welch MN, 55089 United States	Electronic Service		No	M-25-289
138	Darrell	Seki, Sr.	dseki@redlakenation.org			15484 Migizi Drive Red Lake MN, 56671 United States	Electronic Service		No	M-25-289
139	Janet	Shaddix Eling	jshaddix@janetshaddix.com	Shaddix And Associates		7400 Lyndale Ave S Ste 190 Richfield MN, 55423 United States	Electronic Service		No	M-25-289
140	Joel	Smith	jsmith@mnchippewatribe.org	Minnesota Chippewa Tribe		PO Box 217 Cass Lake MN, 56633 United States	Electronic Service		No	M-25-289
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	M-25-289
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	M-25-289
143	Roger	Smith, Sr.	rogermsmithsr@fdlrez.com			1720 Big Lake Road Cloquet MN, 55720 United States	Electronic Service		No	M-25-289
144	Beth	Soholt	bsoholt@cleangridalliance.org	Clean Grid Alliance		570 Asbury Street Suite 201 St. Paul MN, 55104 United States	Electronic Service		No	M-25-289
145	Marie	Spry	mariespry@grandportage.com			PO Box 428 Grand	Electronic Service		No	M-25-289

#	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	M-25-289
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	M-25-289
148	Byron E.	Starns	byron.starns@stinson.com	STINSON LLP		50 S 6th St Ste 2600 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-289
149	Mark	Strohufus	mstrohufus@greenergy.com	Great River Energy		12300 Elm Creek Boulevard Maple Grove MN, 55369-4718 United States	Electronic Service		No	M-25-289
150	Samuel	Strong	sam.strong@redlakenation.org	Red Lake Nation		15484 Migizi Drive Red Lake MN, 56671 United States	Electronic Service		No	M-25-289
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	M-25-289
152	David	Sunderman	daves@benco.org	BENCO (DUPLICATE)		PO Box 8 Mankato MN, 56002-0008 United States	Electronic Service		No	M-25-289
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	M-25-289
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	M-25-289
155	Geoffrey	Tolley	geoff.tolley@gmail.com			855 Stanley Road Two Harbors MN, 55616-1176 United States	Electronic Service		No	M-25-289
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	M-25-289
157	Jackie	Van Norman	jvannorman@greenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	M-25-289
158	Sam	Villella	sdvillella@gmail.com			10534 Alamo Street NE Blaine MN, 55449 United States	Electronic Service		No	M-25-289

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
159	Carla	Vita	carla.vita@state.mn.us	MN DEED		Great Northern Building 12th Floor 180 East Fifth Street St. Paul MN, 55101 United States	Electronic Service		No	M-25-289
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	M-25-289
161	Trent	Waite	twaite@grenergy.com			null null, null United States	Electronic Service		No	M-25-289
162	Heather	Westra	heather.westra@piic.org	Prairie Island Indian Community		5636 Sturgeon Lake Rd Welch MN, 55089 United States	Electronic Service		No	M-25-289
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	M-25-289
164	Cody	Whitebear	cody.whitebear@piic.org	Prairie Island Indian Community		5636 Sturgeon Lake Road Welch MN, 55089 United States	Electronic Service		No	M-25-289
165	John	Williams	jwilliams@grenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	M-25-289
166	Virgil	Wind	virgil.wind@millelacsband.com	Mille Lacs Band of Ojibwe		43408 Oodena Drive Onamia MN, 56359 United States	Electronic Service		No	M-25-289
167	Joseph	Windler	jwindler@winthrop.com	Winthrop & Weinstine		225 South Sixth Street, Suite 3500 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-289
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	M-25-289
169	Curtis	Zaun	czaun@mnseia.org	MnSEIA		PO Box 8141 Saint Paul MN, 55108 United States	Electronic Service		No	M-25-289
170	Kurt	Zimmerman	kwz@ibew160.org	Local Union #160, IBEW		2909 Anthony Ln St Anthony Village MN, 55418-3238 United States	Electronic Service		No	M-25-289
171	Patrick	Zomer	pat.zomer@lawmoss.com	Moss & Barnett PA		150 S 5th St #1200 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-289