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March 28, 2025

—Via Electronic Filing—

Mr. Will Seuffert
Executive Secretary
Minnesota Public Utilities Commission
350 Metro Square Building
121 Seventh Place East
St. Paul, MN 55101

RE: *Initial Comments on Certificate of Need Application*
IN THE MATTER OF THE APPLICATION OF XCEL ENERGY FOR A CERTIFICATE
OF NEED FOR THE MANKATO – MISSISSIPPI RIVER 345 kV TRANSMISSION LINE
PROJECT IN SOUTHEAST MINNESOTA
Docket No. E002/CN-22-532

Dear Mr. Seuffert:

Northern States Power Company, doing business as Xcel Energy, respectfully submits the enclosed Initial Comments pursuant to the Minnesota Public Utilities Commission's January 10, 2025 Notice of Comment Period on the Merits of the Certificate of Need Application in the above-referenced docket.

We have electronically filed this document with the Commission. Copies are also being served on persons on the attached service list. Please contact me at bria.e.shea@xcelenergy.com if you have any questions regarding this filing.

Sincerely,

/s/ Bria E. Shea

BRIA E. SHEA
REGIONAL VICE PRESIDENT, REGULATORY POLICY

Enclosure
cc: Service List

STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION

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

IN THE MATTER OF THE APPLICATION
FOR A CERTIFICATE OF NEED FOR THE
MANKATO – MISSISSIPPI RIVER
TRANSMISSION PROJECT

DOCKET NO. E002/CN-22-532

INITIAL COMMENTS

INTRODUCTION

Northern States Power Company, doing business as Xcel Energy (Applicant or Xcel Energy) respectfully submits these Initial Comments pursuant to the Minnesota Public Utilities Commission’s (Commission) January 10, 2025 Notice of Comment Period on the Merits of the Certificate of Need Application (Application) in the above-referenced docket. In these Initial Comments, Xcel Energy provides a discussion of the need for the proposed Mankato – Mississippi River 345 kilovolt (kV) Transmission Project (the Project) to support the Commission granting a Certificate of Need and an analysis of the two system alternatives that have been proposed.

The Project consists of a new, approximately 130-mile long 345 kV transmission line between the Wilmarth Substation in Mankato, Minnesota and the Mississippi River and a new, approximately 20-mile long 161 kV transmission line between the North Rochester Substation near Pine Island, Minnesota and an existing transmission line northeast of Rochester, Minnesota. The Project is needed to address thermal overloads and congestion issues on the existing 345 kV system across southern Minnesota toward Wisconsin and will provide transmission outlets for renewable energy in Minnesota, North Dakota, and South Dakota.

The Project was studied, reviewed, and approved as part of the Long-Range Transmission Planning (LRTP) Tranche 1 Portfolio by the Midcontinent Independent System Operator, Inc.’s (MISO) Board of Directors in July 2022 as part of its 2021

Transmission Expansion Plan (MTEP21) report.¹ The LRTP Tranche 1 Portfolio will provide significant benefits to the Midwest subregion of the MISO footprint by facilitating more reliable, safe, and affordable energy delivery. The Project, designated as a portion of LRTP4² in MTEP21, is a key part of the LRTP Tranche 1 Portfolio. The transmission system in southern Minnesota is the nexus between significant renewable resources in Minnesota and the Dakotas and the regional load center of the Twin Cities and load centers to the east in Wisconsin. The amount of renewable energy generation on the electric system is increasing as aging traditional generation resources retire and are replaced with renewable resources. This Project will provide additional transmission capacity that is needed to reliably deliver this renewable energy to customers. This Project will relieve overloads on existing transmission facilities and will reduce congestion on the transmission system, resulting in lower energy costs. This Project will also help make significant progress towards Minnesota's carbon emission reduction policy objectives.

As discussed further below, Xcel Energy has demonstrated through its Application, and other filings in this docket, that the Project meets all the requirements to obtain a Certificate of Need and we respectfully request that the Commission grant a Certificate of Need to the Project as proposed.

INITIAL COMMENTS

In its January 10, 2024 Notice of Comment Period on the Merits of the Certificate of Need Application, the Commission requested comments on the following topics: (1) Should the Commission grant a Certificate of Need for the Proposed Project; (2) If granted, what additional conditions or requirements, if any, should be included in the Certificate of Need; and (3) Are there other issues or concerns related to this matter? We address these three topics in turn below.

A. Should the Commission Grant a Certificate of Need for the Proposed Project?

Yes. As demonstrated in chapters 3 through 5 and Appendix G of the Application, the proposed Project satisfies the Certificate of Need statutory and rule requirements and

¹ *In the Matter of the Application of Xcel Energy for a Certificate of Need and Route Permit for the Mankato – Mississippi River 345 kV Transmission Line Project in Southeast Minnesota*, Docket No. E002/CN-22-532, APPLICATION FOR A CERTIFICATE OF NEED AND ROUTE PERMIT FOR THE MANKATO – MISSISSIPPI RIVER TRANSMISSION PROJECT (APPLICATION) at Appendix G-1 (April 2, 2024).

² This Project is the Minnesota portion of LRTP4. The overall LRTP4 project involves the construction of a 345 kV transmission line from the existing Wilmarth Substation in Mankato, Minnesota to the existing Tremval Substation located in west central Wisconsin near the town of Blair. The Wisconsin portion of LRTP4 will be permitted in a separate proceeding before the Public Service Commission of Wisconsin (PSCW).

a Certificate of Need should be granted. The Project provides significant reliability, economic, and carbon reduction benefits, and positions the Company to bring new renewable generation resources online in the coming years. As part of its analysis in MTEP21, MISO concluded that the LRTP4 project addresses overload issues along several transmission lines and at several transformers by providing additional capacity to the currently constrained transmission system in southern Minnesota.³ MISO found that LRTP4 relieves 39 transmission elements with excessive thermal loading when one transmission element is out of service (N-1 contingency) and relieves 96 transmission elements with excessive loading when one or more transmission elements are out of service (N-1-1 contingency).⁴

In addition to meeting system reliability needs, the LRTP4 project will also provide economic benefits to help offset its costs. Xcel Energy conducted additional economic analysis of LRTP4 and determined that it will provide up to \$2.1 billion in economic savings across the MISO footprint over the first 20 years that the LRTP4 project is in service and up to \$3.8 billion in economic savings across the MISO footprint over the first 40 years.⁵ These economic savings will help offset the capital cost of the Project.

Xcel Energy also analyzed the carbon reduction benefits of the LRTP4 project. MISO's analysis demonstrated the implementation of the LRTP Tranche 1 Portfolio is estimated to reduce carbon emissions by 399 million metric tons over the first 20 years and 677 million metric tons over the first 40 years that the LRTP Tranche 1 Portfolio is in service.⁶ Xcel Energy estimated that the LRTP4 project will reduce carbon emissions by 197.9 million metric tons over the first 20 years that the LRTP4 project is in service and by 295.5 million metric tons over the first 40 years that the LRTP4 project is in service.⁷

Both MISO and Xcel Energy have extensively studied this Project. These analyses demonstrate, as required by Minn. R. 7849.0120, subp. A, that “the probable result of denial [of the Application] would be an adverse effect upon the future adequacy, reliability, or efficiency of energy supply to the applicant, to the applicant’s customers, or to the people of Minnesota and neighboring states.” As a result, the Company requests that the Commission grant a Certificate of Need for the Project as proposed.

³ APPLICATION at 67 (April 2, 2024).

⁴ APPLICATION at 49 and 58-59 (April 2, 2024).

⁵ *Id.*

⁶ APPLICATION at 77 and Appendix G-1 at 79 (April 2, 2024) (MTEP21 Report Addendum).

⁷ These values were calculated using the PROMOD MTEP 21 LRTP Reference Model. APPLICATION at 49 and 244-245 (April 2, 2024).

B. System Alternatives Analysis

Minnesota Rule 7849.0120, subp. B requires that the Commission determine “a more reasonable and prudent alternative to the proposed facility has not been demonstrated by a preponderance of the evidence on the record.” During the scoping process for the Environmental Impact Statement (EIS), two system alternatives were proposed for evaluation: (1) the 230 kV alternative; and (2) the Chester Junction Alternative. The 230 kV alternative would replace the proposed 345 kV transmission line for Segments 1-3 of the proposed Project with a lower voltage 230 kV line.⁸ The Chester Junction Alternative involves the construction of a new substation at Chester Junction along Segment 3 to eliminate the need to construct the new 161 kV transmission line in Segment 4 of the proposed Project.⁹ As discussed in the Company’s August 28, 2024 scoping comments¹⁰ and below, neither of these system alternatives is a more reasonable or prudent alternative to the proposed Project.

a. 230 kV Alternative

A lower voltage alternative, such as a 230 kV line, is not a more reasonable and prudent alternative to the proposed 345 kV line because it does not have sufficient capacity to meet the identified need, would require costly substation upgrades, and would have higher line losses as compared to the 345 kV line.

The primary purpose of this Project is to address existing overload and congestion issues on the existing transmission system in southern Minnesota. The existing transmission system is congested during periods of high renewable generation which results in higher energy prices for Minnesota customers. This is because lower cost renewable energy is unable to reach customers. Because of congestion on the transmission system, higher cost generation resources must be dispatched and renewable generation is curtailed. Given the lower capacity of a 230 kV transmission line, this lower voltage alternative would not have sufficient capacity to address the overload and congestion issues on the existing system and would not offer the capacity needed to support future renewable generation in southern Minnesota. As a result, installing the lower voltage 230 kV Alternative would require more transmission facilities to be constructed in the future to provide additional capacity to support this future generation.

⁸ *In the Matter of the Application for a Certificate of Need for the Mankato – Mississippi River Transmission Project*, Docket Nos. E002/CN-22-532 and E002/TL-23-157, MINNESOTA DEPARTMENT OF COMMERCE’S ENVIRONMENTAL IMPACT STATEMENT SCOPING DECISION at 7 (Dec. 2, 2024).

⁹ *Id.*

¹⁰ *In the Matter of the Application for a Certificate of Need for the Mankato – Mississippi River Transmission Project*, Docket Nos. E002/CN-22-532 and E002/TL-23-157, APPLICANT’S RESPONSE TO ENVIRONMENTAL STATEMENT IMPACT SCOPING COMMENTS (August 28, 2024).

The 230 kV Alternative would also require costly substation upgrades. The majority of the transmission system in the Project area is at the 345 kV voltage level such that integrating a new line at the 345 kV voltage fits well into the existing system without requiring the need to construct additional substation facilities. In contrast, there is no existing 230 kV transmission in the Project area. As such, integrating a new 230 kV transmission line into this area would require costly substation upgrades to be completed at the Wilmarth and North Rochester substations. Based on MISO's MTEP24 cost estimation guide, the cost for the two 345/230 kV transformers required to construct the 230 kV Alternative is approximately \$14.5 million.¹¹

Another drawback of the lower voltage 230 kV Alternative is that lower voltage lines tend to have higher losses than higher voltage lines. This is because when the voltage of a line is lowered, the line rating must be increased to achieve similar levels of power transfer. To achieve a comparable line rating on a lower voltage line, larger conductor and thus larger structures, foundations, and associated hardware would also be required leading to higher costs.

Given these considerations, the 230 kV Alternative is not a more reasonable or prudent alternative to the proposed 345 kV transmission line.

b. Chester Junction Alternative

The Chester Junction Alternative is not a more reasonable and prudent alternative to the proposed 161 kV transmission line because it would remove any economic benefits of the Project for Xcel Energy and other Minnesota utilities, it would require rebuilding several 161 kV transmission lines, and will likely result in a delayed in-service date for the Project.

In the Application, Xcel Energy conducted an economic analyses using the PROMOD software to calculate the adjusted production cost (APC) savings benefit of the entire LRTP4 project under a number of future scenarios.¹² Xcel Energy determined that the APC savings benefit of the LRTP4 project to the MISO footprint is up to \$2.1 billion over the first 20 years that the Project being in service.¹³

¹¹ MISO, "Transmission Cost Estimation Guide for MTEP24" at 25, (May 1, 2024) available at <https://cdn.misoenergy.org/MISO%20Transmission%20Cost%20Estimation%20Guide%20for%20MTEP24337433.pdf>.

¹² APPLICATION at 73-77 (April 2, 2024).

¹³ APPLICATION at 49 (April 2, 2024).

Xcel Energy performed a similar economic analyses on the Chester Junction Alternative using two sets of MISO models. The first round of analysis was performed using MISO's MTEP21 Series 1A Future 2A model. This model assumes that all of the LRTP Tranche 1 Portfolio of projects are in-service but Xcel Energy modified this model to include either the LRTP4 project or the Chester Junction Alternative. This first round of analysis showed that the Chester Junction Alternative provided \$130.59 million in economic benefits to the MISO footprint but provided *negative* \$2.85 million in economic benefits to the Project partners (Xcel Energy, Southern Minnesota Municipal Power Agency (SMMPA), and Dairyland Power Cooperative (DPC)) for the first 20 years that the alternative is in service.

In December 2024, MISO's Board of Directors approved its LRTP Tranche 2.1 Portfolio of projects. The LRTP Tranche 2.1 includes a number of new transmission projects in southern Minnesota. The second round of analysis performed by Xcel Energy used a more recent set of MISO models that assumed that all of the Tranche 2.1 transmission projects are in service. This second round of analysis compared the economic benefits of the Chester Junction Alternative to the proposed LRTP4 project once these MISO Tranche 2.1 projects are constructed. Xcel Energy's economic analyses found that the Chester Junction Alternative provided \$14.95 million less in APC savings benefits to MISO Local Resource Zone 1 as compared to the proposed LRTP4 project over the first 20-years that the alternative is in service. Similarly, the Chester Junction Alternative has \$15.48 million less in APC savings benefits to the Project partners (Xcel Energy, Dairyland Power Cooperative, and SMMPA) as compared to the proposed LRTP4 project over the first 20 years that the alternative is in service.

In both rounds of analysis, the economic benefits of the Chester Junction Alternative are reduced or negative as compared to the proposed LRTP4 project because adding the Chester Junction Substation along the 345 kV line causes additional power from the 345 kV line to flow onto the 161 kV system that is at capacity, resulting in additional system congestion. System congestion increases costs for electricity consumers because it prevents delivery of the lowest-cost generation to where it is needed, forcing the system to rely on higher-cost generation sources, ultimately resulting in higher energy costs and lower economic benefits.

In addition to reduced economic benefits, the Chester Junction Alternative would also require rebuilding at least three existing 161 kV transmission lines. As previously stated, the primary purpose of the Project is to address existing and future reliability issues on the transmission system in southern Minnesota. Under current system conditions, renewable generation from southern Minnesota flows north along the 345 kV system through the North Rochester Substation and then continues either north to the Twin

Cities load center or east to Wisconsin. If the Chester Junction Alternative is constructed, certain contingencies will result in overloads of facilities in the current 20-year MISO model. Specifically, loss of the Byron – North Rochester 345 kV transmission line forces power onto lower-capacity 161 kV equipment. The addition of the Chester Junction Substation creates a new, lower-impedance path, that when paired with a second outage, causes existing 161 kV lines to overload. To address these overloads, three 161 kV lines would need to be rebuilt to a higher capacity if the Chester Junction Alternative is selected: (1) Crosstown – Cascade 161 kV transmission line; (2) Crosstown – Silver Lake 161 kV transmission line; and (3) Cascade to Bamber 161 kV transmission line. The cost to upgrade these three 161 kV transmission lines is approximately \$17.4 million.

Finally, the Chester Junction Alternative would also likely result in a delay in the Project's in-service date due to the time required to procure the necessary land and equipment to construct this alternative. The proposed Project is scheduled to start construction in 2026/2027 and be placed in service in 2030. Construction of the Chester Junction Alternative will require acquisition of an approximately 40-acre parcel west of U.S. Highway 63 to construct a new substation. At this time, Xcel Energy has not identified any potential sites for this new substation. This new substation would require a new 161/345 kV transformer, eight circuit breakers, as well as additional standard substation equipment. Procuring the equipment for the Chester Junction Alternative may pose schedule challenges as circuit breakers currently require a 2.5-year lead time and transformers have a four-year lead time. This means that the earliest that Xcel Energy could obtain the necessary transformer for the Chester Junction Alternative is 2030. This would delay the in-service date for the Project by at least a year. Xcel Energy notes that this one-year delay in the in-service date is based on current timelines to procure transformers but this delay could be longer depending on the state of the supply chain at the time this equipment is ordered.

Given these considerations, the Chester Junction Alternative is not a more reasonable or prudent alternative to the proposed 161 kV transmission line.

C. If granted, what additional conditions or requirements, if any, should be included in the Certificate of Need?

To the extent the Commission seeks to impose a cost control condition similar to other recent transmission projects, Xcel Energy requests that the Commission approve a

condition similar to the one ordered by the Commission in *In the Matter of the Application for a Certificate of Need for the Big Stone South – Alexandria – Big Oaks Transmission Project*¹⁴:

Xcel Energy shall provide an updated cost estimate for the Project that reflect the Commission's decision within 60 days of this order. Xcel Energy bears the burden of proof in any future regulatory proceeding related to the recovery of any costs above this updated cost estimate.

CONCLUSION

The Mankato – Mississippi 345 kV Transmission Project is vitally needed to address thermal and voltage reliability issues on the transmission system in southern Minnesota. The Project will also provide economic and carbon reduction benefits. Xcel Energy respectfully requests that the Commission approve the Application on its merits and grant a Certificate of Need for the Project.

Dated: March 28, 2025

Northern States Power Company

¹⁴ *In the Matter of the Application for a Certificate of Need for the Big Stone South – Alexandria – Big Oaks Transmission Project*, Docket Nos. E002, E017, ET2, E015, ET10/CN-22-538, ORDER GRANTING CERTIFICATE OF NEED AND ISSUING ROUTE PERMIT at Order Point 5 (Oct. 30, 2024).

IN THE MATTER OF THE APPLICATION OF
XCEL ENERGY FOR A CERTIFICATE OF
NEED FOR THE MANKATO – MISSISSIPPI
RIVER 345 kV TRANSMISSION LINE
PROJECT IN SOUTHEAST MINNESOTA

Docket No. E002/CN-22-532

CERTIFICATE OF SERVICE

Gustav Gerhardson certifies that on the 28th day of March, 2025, on behalf of Northern States Power Company, doing business as Xcel Energy, he efiled a true and correct copy of **Initial Comments on Certificate of Need Application** by posting the same on [eDockets](#). Said filing is also served as designated on the attached Service List on file with the Minnesota Public Utilities Commission in the above-referenced docket number.

/s/ Gustav Gerhardson

Gustav Gerhardson

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#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
52	John	Farrell	jfarrell@llsr.org	Institute for Local Self-Reliance		2720 E. 22nd St Institute for Local Self-Reliance Minneapolis MN, 55406 United States	Electronic Service		No	22-532Official CC Service List
53	Eric	Fehlhaber	efehlhaber@dakotaelectric.com	Dakota Electric Association		4300 220th St W Farmington MN, 55024 United States	Electronic Service		No	22-532Official CC Service List
54	Annie	Felix Gerth	annie.felix-gerth@state.mn.us			Board of Water & Soil Resources 520 Lafayette Rd Saint Paul MN, 55155 United States	Electronic Service		No	22-532Official CC Service List
55	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	22-532Official CC Service List
56	Kade	Ferris	kade.ferris@redlakenation.org	Red Lake Region		PO Box 274 Red Lake MN, 56671 United States	Electronic Service		No	22-532Official CC Service List
57	Leonard	Fineday	leonard.fineday@llojibwe.net	Leech Lake Bank of Ojibwe		190 Sailstar Drive NW Cass Lake MN, 56633 United States	Electronic Service		No	22-532Official CC Service List
58	Terri	Finn	terri.goggleye@llojibwe.net			null null, null United States	Electronic Service		No	22-532Official CC Service List
59	Henry	Fox	henry.fox@whiteearth-nsn.gov	White Earth Nation		PO Box 418 White Earth MN, 56569 United States	Electronic Service		No	22-532Official CC Service List
60	Gary	Frazer	gfrazier@mnchippewatribe.org	Minnesota Chippewa Tribe		PO Box 217 Cass Lake MN, 56633 United States	Electronic Service		No	22-532Official CC Service List
61	Daryll	Fuentes	energy@usg.com	USG Corporation		550 W Adams St Chicago IL, 60661 United States	Electronic Service		No	22-532Official CC Service List
62	Mary Ann	Gagnon	maryanng@grandportage.com	Grand Portage Band of Ojibwe		PO Box 428 Grand Portage MN, 55605 United States	Electronic Service		No	22-532Official CC Service List
63	Karen A	Gebhardt	kageb1@gvtel.com			43901 253rd Ave Leonard MN, 56652-4026 United States	Electronic Service		No	22-532Official CC Service List
64	Shannon	Geshick	shannon.geshick@state.mn.us	Minnesota Indian Affairs Council (MIAC)		null null, null United States	Electronic Service		No	22-532Official CC Service List
65	Todd	Green	todd.a.green@state.mn.us		Minnesota Department of Labor & Industry	443 Lafayette Rd N St. Paul MN, 55155-4341 United States	Electronic Service		No	22-532Official CC Service List

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
66	Todd J.	Guerrero	todd.guerrero@kutakrock.com	Kutak Rock LLP		Suite 1750 220 South Sixth Street Minneapolis MN, 55402-1425 United States	Electronic Service		No	22-532Official CC Service List
67	Jeremy	Hamilton	jhamilton@uppersiouxcommunity-nsn.gov	Upper Sioux Community		Upper Sioux Community PO Box 147 Granite Falls MN, 56241 United States	Electronic Service		No	22-532Official CC Service List
68	Ashley	Harrison	ashley.harrison@llojibwe.net	Leech Lake Band of Ojibwe		190 Sailstar Dr NW Cass Lake MN, 56633 United States	Electronic Service		No	22-532Official CC Service List
69	Larry	Hartman	larry.hartman@state.mn.us		Department of Commerce	85 7th Place East, Suite 280 St. Paul MN, 55101 United States	Electronic Service		No	22-532Official CC Service List
70	Amy	Hastings	amyh@uppersiouxcommunity-nsn.gov	Upper Sioux Community		5722 Travers Lane PO Box 147 Granite Falls MN, 56241 United States	Electronic Service		No	22-532Official CC Service List
71	Ellen	Heine	ellen.l.heine@xcelenergy.com	Xcel Energy		414 Nicollet Mall, MP-8 Minneapolis MN, 55401 United States	Electronic Service		No	22-532Official CC Service List
72	Adam	Heinen	aheinen@dakotaelectric.com	Dakota Electric Association		4300 220th St W Farmington MN, 55024 United States	Electronic Service		No	22-532Official CC Service List
73	Abigail	Hencheck	ahencheck@mncenter.org	Minnesota Center for Environmental Advocacy		1919 University Ave W Suite 515 St. Paul MN, 55104 United States	Electronic Service		No	22-532Official CC Service List
74	Annete	Henkel	mui@mnuutilityinvestors.org	Minnesota Utility Investors		413 Wacouta Street #230 St.Paul MN, 55101 United States	Electronic Service		No	22-532Official CC Service List
75	Valerie	Herring	vherring@taftlaw.com	Taft Stettinius & Hollister LLP		2200 IDS Center 80 S. Eighth Street Minneapolis MN, 55402 United States	Electronic Service		No	22-532Official CC Service List
76	Corey	Hintz	chintz@dakotaelectric.com	Dakota Electric Association		4300 220th Street Farmington MN, 55024-9583 United States	Electronic Service		No	22-532Official CC Service List
77	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	22-532Official CC Service List
78	Kari	Howe	kari.howe@state.mn.us		DEED	332 Minnesota St, #E200 1ST National Bank Bldg St. Paul MN,	Electronic Service		No	22-532Official CC Service List

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
92	Bruce	King	brenda@ranww.org	Realtors, Association of Northwestern WI		Suite 3 1903 Keith Street Eau Claire WI, 54701 United States	Electronic Service		No	22-532Official CC Service List
93	Raymond	Kirsch	raymond.kirsch@state.mn.us		Department of Commerce	85 7th Place E Ste 500 St. Paul MN, 55101 United States	Electronic Service		No	22-532Official CC Service List
94	Chad	Konickson	chad.konickson@usace.army.mil	U.S.Army Corps of Engineers		332 Minnesota St. Suite E1500 Saint Paul MN, 55101 United States	Electronic Service		No	22-532Official CC Service List
95	Stacy	Kotch Egstad	stacy.kotch@state.mn.us		MINNESOTA DEPARTMENT OF TRANSPORTATION	395 John Ireland Blvd. St. Paul MN, 55155 United States	Electronic Service		No	22-532Official CC Service List
96	Mark	Kotschevar	mkotschevar@rpu.org	Rochester Public Utilities		4000 East River Road NE Rochester MN, 55906 United States	Electronic Service		No	22-532Official CC Service List
97	Michael	Krikava	mkrikava@taftlaw.com	Taft Stettinius & Hollister LLP		2200 IDS Center 80 S 8th St Minneapolis MN, 55402 United States	Electronic Service		No	22-532Official CC Service List
98	Nicolle	Kupser	nkupser@greatermngas.com	Greater Minnesota Gas, Inc.		1900 Cardinal Ln PO Box 798 Faribault MN, 55021 United States	Electronic Service		No	22-532Official CC Service List
99	Mike	Laroque	mike.laroque@whiteearth-nsn.gov	White Earth Nation		PO Box 418 White Earth MN, 56591 United States	Electronic Service		No	22-532Official CC Service List
100	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	22-532Official CC Service List
101	James D.	Larson	james.larson@avantenergy.com	Avant Energy Services		220 S 6th St Ste 1300 Minneapolis MN, 55402 United States	Electronic Service		No	22-532Official CC Service List
102	Peder	Larson	plarson@larkinhoffman.com	Larkin Hoffman Daly & Lindgren, Ltd.		8300 Norman Center Drive Suite 1000 Bloomington MN, 55437 United States	Electronic Service		No	22-532Official CC Service List
103	Jason	Loos	jason.loos@centerpointenergy.com	CenterPoint Energy Resources Corp.		505 Nicollet Mall 3rd Floor Minneapolis MN, 55402 United States	Electronic Service		No	22-532Official CC Service List
104	Susan	Ludwig	sludwig@mnpower.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	22-532Official CC Service List
105	Vernelle	Lussier	vernelle.lussier@redlakenation.org	Red Lake Nation		15484 Migizi Drive Red Lake MN,	Electronic Service		No	22-532Official CC

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						56671 United States				Service List
106	Jamie	MacAlister	jamie.macalister@state.mn.us		Department of Commerce	85 7th Place East, Ste. 500 St. Paul MN, 55101 United States	Electronic Service		No	22-532Official CC Service List
107	Kavita	Maini	kmaini@wi.rr.com	KM Energy Consulting, LLC		961 N Lost Woods Rd Oconomowoc WI, 53066 United States	Electronic Service		No	22-532Official CC Service List
108	Dawn S	Marsh	dawn_marsh@fws.gov	U.S. Fish & Wildlife Service		Minnesota-Wisconsin Field Offices 4101 American Blvd E Bloomington MN, 55425 United States	Electronic Service		No	22-532Official CC Service List
109	Shena	Matrious	shena.matrious@millelacsband.com	Mille Lacs Band of Ojibwe		43408 Oodena Drive Onamia MN, 56349 United States	Electronic Service		No	22-532Official CC Service List
110	April	McCormick	aprilm@grandportage.com	Grand Portage Band of Lake Superior Chippewa		PO Box 428 Grand Portage MN, 55605 United States	Electronic Service		No	22-532Official CC Service List
111	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	22-532Official CC Service List
112	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	22-532Official CC Service List
113	Stacy	Miller	stacy.miller@minneapolismn.gov	City of Minneapolis		350 S. 5th Street Room M 301 Minneapolis MN, 55415 United States	Electronic Service		No	22-532Official CC Service List
114	Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP		33 South Sixth St Ste 4200 Minneapolis MN, 55402 United States	Electronic Service		No	22-532Official CC Service List
115	Travis	Morrison	travis.morrison@boisforte-nsn.gov	Bois Forte Band of Chippewa		Bois Forte Tribal Government 5344 Lakeshore Drive Nett Lake MN, 55772 United States	Electronic Service		No	22-532Official CC Service List
116	Robert	Moyer, Jr.	rmoyer@boisforte-nsn.gov	Bois Forte Band of Chippewa Tribal Government		5344 Lakeshore Drive Nett Lake MN, 55772 United States	Electronic Service		No	22-532Official CC Service List
117	Sonny	Myers	smyers@1854treatyauthority.org	1854 Treaty Authority		4428 Haines Rd Duluth MN,	Electronic Service		No	22-532Official CC

[illegible]

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
131	Catherine	Phillips	catherine.phillips@wecenergygroup.com	Minnesota Energy Resources		231 West Michigan St Milwaukee WI, 53203 United States	Electronic Service		No	22-532Official CC Service List
132	Angela	Piner	angela.piner@hdrinc.com	HDR, Inc.		Suite 600 701 Xenia Avenue South Suite 600 Minneapolis MN, 55416 United States	Electronic Service		No	22-532Official CC Service List
133	Joe	Plumer	joe.plumer@redlakenation.org	Red Lake Nation		15484 Migizi Drive Red Lake MN, 56671 United States	Electronic Service		No	22-532Official CC Service List
134	Benjamin L.	Porath	ben.porath@dairylandpower.com	Dairyland Power Cooperative		3200 East Ave S PO Box 817 La Crosse WI, 54602-0817 United States	Electronic Service		No	22-532Official CC Service List
135	Robert	Prescott	bob.prescott@lowersioux.com	Lower Sioux Indian Community		39527 Highway 1 Morton MN, 56270 United States	Electronic Service		No	22-532Official CC Service List
136	Larry	Rebman	larryemls@hotmail.com	EMLS, Inc		PO Box 122 Appleton MN, 56208 United States	Electronic Service		No	22-532Official CC Service List
137	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	22-532Official CC Service List
138	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	22-532Official CC Service List
139	Margaret	Rheude	margaret_rheude@fws.gov	U.S. Fish and Wildlife Service		Twin Cities Ecological Services Field Office 4101 American Blvd. E. Bloomington MN, 55425 United States	Electronic Service		No	22-532Official CC Service List
140	Susan	Romans	sromans@allete.com	Minnesota Power		30 West Superior Street Legal Dept Duulth MN, 55802 United States	Electronic Service		No	22-532Official CC Service List
141	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	22-532Official CC Service List
142	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	22-532Official CC Service List

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
143	Nathaniel	Runke	nrunke@local49.org			611 28th St. NW Rochester MN, 55901 United States	Electronic Service		No	22-532Official CC Service List
144	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	22-532Official CC Service List
145	Adam	Savariego	adams@uppersiouxcommunity-nsn.gov	Upper Sioux Community		5722 Travers Lane PO Box 147 Granite Falls MN, 56241 United States	Electronic Service		No	22-532Official CC Service List
146	Elizabeth	Schmiesing	eschmiesing@winthrop.com	Winthrop & Weinstine, P.A.		225 South Sixth Street Suite 3500 Minneapolis MN, 55402 United States	Electronic Service		No	22-532Official CC Service List
147	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	22-532Official CC Service List
148	Christine	Schwartz	regulatory.records@xcelenergy.com	Xcel Energy		414 Nicollet Mall FL 7 Minneapolis MN, 55401- 1993 United States	Electronic Service		Yes	22-532Official CC Service List
149	Jessie	Seim	jessie.seim@piic.org	Prairie Island Indian Community		5636 Sturgeon Lake Rd Welch MN, 55089 United States	Electronic Service		No	22-532Official CC Service List
150	Darrell	Seki, Sr.	dseki@redlakenation.org			15484 Migizi Drive Red Lake MN, 56671 United States	Electronic Service		No	22-532Official CC Service List
151	Will	Seuffert	will.seuffert@state.mn.us		Public Utilities Commission	121 7th PI E Ste 350 Saint Paul MN, 55101 United States	Electronic Service		Yes	22-532Official CC Service List
152	Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates		7400 Lyndale Ave S Ste 190 Richfield MN, 55423 United States	Electronic Service		Yes	22-532Official CC Service List
153	Tom	Slukich	tom@nationalconductor.com	National Conductor Constructors		18119 Hwy 371 North Brainerd MN, 56401 United States	Electronic Service		No	22-532Official CC Service List
154	Joel	Smith	jsmith@mnchippewatribe.org	Minnesota Chippewa Tribe		PO Box 217 Cass Lake MN, 56633 United States	Electronic Service		No	22-532Official CC Service List
155	Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.		76 W Kellogg Blvd St. Paul MN, 55102 United States	Electronic Service		No	22-532Official CC Service List
156	Nizhoni	Smith	nizhoni.smith@lowersioux.com	Lower Sioux Indian Community		PO Box 308 39527 Reservation Highway 1 Morton MN,	Electronic Service		No	22-532Official CC Service List

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						56270 United States				
157	Roger	Smith, Sr.	rogermsmithsr@fdlrez.com			1720 Big Lake Road Cloquet MN, 55720 United States	Electronic Service		No	22-532Official CC Service List
158	Adam	Sokolski	adam.sokolski@edf-re.com	EDF Renewable Energy		10 Second Street NE Ste 400 Minneapolis MN, 55410 United States	Electronic Service		No	22-532Official CC Service List
159	Eugene	Sommers	eugene.sommers@whiteearth-nsn.gov	White Earth Nation		PO BOX 418 White Earth MN, 56591 United States	Electronic Service		No	22-532Official CC Service List
160	Peggy	Sorum	peggy.sorum@centerpointenergy.com	CenterPoint Energy		505 Nicollet Mall Minneapolis MN, 55402 United States	Electronic Service		No	22-532Official CC Service List
161	Marie	Spry	mariespry@grandportage.com			PO Box 428 Grand Portage MN, 55605 United States	Electronic Service		No	22-532Official CC Service List
162	Cheyenne	St. John	cheyanne.stjohn@lowersioux.com	Lower Sioux Tribal Community		39527 Reservation Hwy 1 Morton MN, 56270 United States	Electronic Service		No	22-532Official CC Service List
163	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	22-532Official CC Service List
164	Byron E.	Starns	byron.starns@stinson.com	STINSON LLP		50 S 6th St Ste 2600 Minneapolis MN, 55402 United States	Electronic Service		No	22-532Official CC Service List
165	Lauren	Steinhaeuser	lauren.steinhaeuser@xcelenergy.com	Northern States Power Company dba Xcel Energy		414 Nicollet Mall, 401-08 Minneapolis MN, 55401 United States	Electronic Service		No	22-532Official CC Service List
166	Toby	Stephens	tobys@grandportage.com	Grand Portage Band of Lake Superior Chippewa		PO BOX 428 Grand Portage MN, 55605 United States	Electronic Service		No	22-532Official CC Service List
167	Cary	Stephenson	cstephenson@otpc.com	Otter Tail Power Company		215 South Cascade Street Fergus Falls MN, 56537 United States	Electronic Service		No	22-532Official CC Service List
168	Mark	Strohfus	mstrohfus@greenergy.com	Great River Energy		12300 Elm Creek Boulevard Maple Grove MN, 55369-4718 United States	Electronic Service		No	22-532Official CC Service List
169	Carl	Strohm	cjsmg@sbcglobal.net	SBC Global		105 East Edgewood Ave Indianapolis IN, 46227 United States	Electronic Service		No	22-532Official CC Service List

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
170	James M	Strommen	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered		150 S 5th St Ste 700 Minneapolis MN, 55402 United States	Electronic Service		No	22-532Official CC Service List
171	Samuel	Strong	sam.strong@redlakenation.org	Red Lake Nation		15484 Migizi Drive Red Lake MN, 56671 United States	Electronic Service		No	22-532Official CC Service List
172	Emily	Suppes	emily.suppes@centerpointenergy.com	CenterPoint Energy Minnesota Gas		505 Nicollet Mall Minneapolis MN, 55402 United States	Electronic Service		No	22-532Official CC Service List
173	Tom	Swafford	tswafford@umsi.us	Utility Mapping Services, Inc		3947 E Calvary Rd Suite 103 Duluth MN, 55803 United States	Electronic Service		No	22-532Official CC Service List
174	Eric	Swanson	eswanson@winthrop.com	Winthrop & Weinstine		225 S 6th St Ste 3500 Capella Tower Minneapolis MN, 55402-4629 United States	Electronic Service		No	22-532Official CC Service List
175	Todd	Tadych	ttadych@atcllc.com	American Transmission Company LLC		5303 Fen Oak Dr Madison WI, 53718 United States	Electronic Service		No	22-532Official CC Service List
176	Camille	Tanhoff	kamip@upperSiouxcommunity-nsn.gov	Upper Sioux Community		5722 Travers Lane PO BOX 147 Granite Falls MN, 56241 United States	Electronic Service		No	22-532Official CC Service List
177	Stuart	Tommerdahl	stommerdahl@otpc.com	Otter Tail Power Company		215 S Cascade St PO Box 496 Fergus Falls MN, 56537 United States	Electronic Service		No	22-532Official CC Service List
178	Jayme	Trusty	execdir@swrdc.org	SWRDC		2401 Broadway Ave #1 Slayton MN, 56172 United States	Electronic Service		No	22-532Official CC Service List
179	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	22-532Official CC Service List
180	Jen	Tyler	tyler.jennifer@epa.gov	US Environmental Protection Agency		Environmental Planning & Evaluation Unit 77 W Jackson Blvd. Mailstop B-19J Chicago IL, 60604-3590 United States	Electronic Service		No	22-532Official CC Service List
181	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	22-532Official CC Service List

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
182	Leonard	Wabasha	leonard.wabasha@shakopeedakota.org	Shakopee Mdwakanton Sioux Community		2300 Tiwahe Circle Shakopee MN, 55379 United States	Electronic Service		No	22-532Official CC Service List
183	Caren	Warner	caren.warner@state.mn.us		Department of Commerce	85 7th Place East Suite 280 St. Paul MN, 55101-2198 United States	Electronic Service		No	22-532Official CC Service List
184	Cynthia	Warzecha	cynthia.warzecha@state.mn.us	Minnesota Department of Natural Resources		500 Lafayette Road Box 25 St. Paul MN, 55155-4040 United States	Electronic Service		No	22-532Official CC Service List
185	Elizabeth	Wefel	eawefel@flaherty-hood.com	Missouri River Energy Services		525 Park St Ste 470 Saint Paul MN, 55103 United States	Electronic Service		No	22-532Official CC Service List
186	Heather	Westra	heather.westra@piic.org	Prairie Island Indian Community		5636 Sturgeon Lake Rd Welch MN, 55089 United States	Electronic Service		No	22-532Official CC Service List
187	Alan	Whipple	sa.property@state.mn.us		Minnesota Department Of Revenue	Property Tax Division 600 N. Robert Street St. Paul MN, 55146-3340 United States	Electronic Service		No	22-532Official CC Service List
188	Deanna	White	mncwa@cleanwater.org	Clean Water Action & Water Fund of MN		330 S 2nd Ave Ste 420 Minneapolis MN, 55401 United States	Electronic Service		No	22-532Official CC Service List
189	Noah	White	noah.white@piic.org	Prairie Island Indian Community		5636 Sturgeon Lake Road Welch MN, 55089 United States	Electronic Service		No	22-532Official CC Service List
190	Steve	White	steve.white@llojibwe.net	Leech Lake Band of Ojibwe		190 Sailstar Drive NW Cass Lake MN, 56633 United States	Electronic Service		No	22-532Official CC Service List
191	Cody	Whitebear	cody.whitebear@piic.org	Prairie Island Indian Community		5636 Sturgeon Lake Road Welch MN, 55089 United States	Electronic Service		No	22-532Official CC Service List
192	Mike	Wilson	mike.wilson@millelacsband.com	Mille Lacs Band of Ojibwe		43408 Oodena Dr Onamia MN, 56359 United States	Electronic Service		No	22-532Official CC Service List
193	Virgil	Wind	virgil.wind@millelacsband.com	Mille Lacs Band of Ojibwe		43408 Oodena Drive Onamia MN, 56359 United States	Electronic Service		No	22-532Official CC Service List
194	Joseph	Windler	jwindler@winthrop.com	Winthrop & Weinstine		225 South Sixth Street, Suite 3500 Minneapolis MN, 55402 United States	Electronic Service		No	22-532Official CC Service List
195	Jonathan	Wolfgram	jonathan.wolfgram@state.mn.us		Office of Pipeline Safety	445 Minnesota St Ste 147 Woodbury	Electronic Service		No	22-532Official CC Service List

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						MN, 55125 United States				
196	Laurie	York	laurie.york@whiteearth-nsn.gov	White Earth Reservation Business Committee		PO Box 418 White Earth MN, 56591 United States	Electronic Service		No	22-532Official CC Service List
197	Ian	Young	ianyoun@fdlband.org	Fond du Lac Band of Lake Superior Chippewa		1720 Big Lake Road Cloquet MN, 55720 United States	Electronic Service		No	22-532Official CC Service List
198	Kurt	Zimmerman	kwz@ibew160.org	Local Union #160, IBEW		2909 Anthony Ln St Anthony Village MN, 55418-3238 United States	Electronic Service		No	22-532Official CC Service List
199	Patrick	Zomer	pat.zomer@lawmoss.com	Moss & Barnett PA		150 S 5th St #1200 Minneapolis MN, 55402 United States	Electronic Service		No	22-532Official CC Service List