



414 Nicollet Mall  
Minneapolis, MN 55401

March 19, 2025

—Via Electronic Filing—

Will Seuffert  
Executive Secretary  
Minnesota Public Utilities Commission  
121 7<sup>th</sup> Place East, Suite 350  
St. Paul, MN 55101

RE: REPLY COMMENTS  
IN THE MATTER OF AN INVESTIGATION INTO IMPLEMENTING CHANGES TO  
THE RENEWABLE ENERGY STANDARD AND THE NEWLY CREATED CARBON  
FREE STANDARD UNDER MINN. STAT. § 216B.1691  
DOCKET NO. E999/CI-23-151

Dear Mr. Seuffert:

Northern States Power Company, doing business as Xcel Energy, submits the enclosed Reply Comments responding to the Public Utilities Commission's request for comment on clarification to the new or amended terms added to Minn. State 216B.1691 as they pertain to implementation of the Carbon Free Standard (CFS).

We have electronically filed this document with the Minnesota Public Utilities Commission, and copies have been served on the parties on the attached service list. Please contact Patti Leaf at [patricia.b.leaf@xcelenergy.com](mailto:patricia.b.leaf@xcelenergy.com) or me at [bria.e.shea@xcelenergy.com](mailto:bria.e.shea@xcelenergy.com) if you have any questions regarding this filing.

Sincerely,

/s/

BRIA E. SHEA  
REGIONAL VICE PRESIDENT, REGULATORY POLICY

Enclosures  
cc: Service List

STATE OF MINNESOTA  
BEFORE THE  
MINNESOTA PUBLIC UTILITIES COMMISSION

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

IN THE MATTER OF AN INVESTIGATION  
INTO IMPLEMENTING CHANGES TO THE  
RENEWABLE ENERGY STANDARD AND  
THE NEWLY CREATED CARBON FREE  
STANDARD UNDER MINN. STAT. §  
216B.1691

DOCKET NO. E999/CI-23-151

**REPLY COMMENTS**

**INTRODUCTION**

Northern States Power Company, doing business as Xcel Energy, submits these Reply Comments to the Minnesota Public Utilities Commission responding to parties' January 29, 2025 Initial Comments regarding the Commission's November 8, 2023 Notice of Comment Period and the February 6, 2024 Notice of Extended Comment Period issued in the above-referenced Docket. We appreciate the opportunity to provide these Reply Comments to the proposals submitted by the Department of Commerce and Clean Energy Organizations (CEOs).

**REPLY COMMENTS**

Xcel Energy strongly opposes the Department's recommendation in its January 29, 2025, comments that the Commission adopt hourly matching for Carbon Free Standard (CFS) compliance for the following reasons:

- The Department's hourly proposal is inconsistent with the plain language and the legislative intent of Minn. Stat. § 216B.1691 which clearly states that compliance with the CFS will be based upon an annual metric. The Commission's authority to implement the standard is limited to the statutory intent.
- Annual matching, not hourly, is the longstanding standard in compliance with Minnesota's clean energy requirements. The Department's interpretation goes

against two decades of demonstrating compliance on an annual basis with the Minnesota Renewable Energy Standard- which the CFS was modeled after and incorporated into.

- An hourly matching requirement would increase costs for customers as it would require us to significantly overbuild our system beyond our customers' needs. In fact, initial modeling suggests Xcel Energy alone would need to add an incremental 17,700 MWs of storage (more than 100 times the storage currently operational in all of MISO) and over 4,000 MW of additional solar resources by 2040 resulting in a 60 percent increased revenue requirement to serve the same customer load. For comparison, applying a 60 percent increase to current base rates would result in an increase of approximately \$45 per month over the current average bill of \$95 for the average residential customer (for an overall average bill increase of 47 percent) –again, to serve the same load.
- The Department's proposal would require the creation of hourly markets. No other state in the U.S. has adopted hourly credit requirements as part of a renewable or carbon free standard. Without a broader market, Minnesota utilities would only be able to trade with each other—likely all looking to buy for the same hours (when wind and solar generation is low), thus competing for the same limited supply. The concept of hourly trading of Renewable Energy Credits (RECs)s/ Alternative Energy Credits (AECs)s with only Minnesota utilities participating results in an inefficient and likely costly market.

We discuss each of these points in turn below.

#### **A. The Department's Proposal is Inconsistent with the Statute**

In Comments, the Department “recommends that the Commission order hourly matching for CFS compliance for . . . all electric utilities.”<sup>1</sup>

This recommendation to require hourly tracking and compliance is in direct conflict with the plain wording of Minn. Stat. § 216B.1691 subd 2g. Carbon-free standard. The language of the statute clearly states that compliance is measured on an annual basis:

In addition to the requirements under subdivisions 2a and 2f, each electric utility must generate or procure sufficient electricity generated from a carbon-free energy technology to provide the electric utility's retail customers in Minnesota, or the retail customers of a distribution utility to which the electric utility provides

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<sup>1</sup> Department of Commerce Initial Comments at 11, Docket No. E999/CI-23-151 (January 29, 2025) (DOC Initial Comments).

wholesale electric service, so that the electric utility generates or procures an amount of electricity from carbon-free energy technologies that is equivalent to at least the following standard percentages of the electric utility's total retail electric sales to retail customers in Minnesota *by the end of the year* indicated. [Emphasis added]

- 1) 2030 80 percent for public utilities; 60 percent for other electric utilities
- 2) 2035 90 percent for all electric utilities
- 3) 2040 100 percent for all electric utilities.<sup>2</sup>

The plain language of the statute is clear that compliance is to be measured on an annual basis, referring explicitly to *the end of the year* – not at the end of each hour within the year, as is proposed by the Department. Requiring compliance demonstration on an hourly basis would directly conflict with the legislation as written. Xcel Energy supported the passage of the CFS in 2023 with the acknowledgement that compliance would be evaluated on an annual basis, not an hourly basis, and with flexibility built in to meet the standard with the ability to rely on RECs to demonstrate compliance, as has been the case with the Renewable Energy Standard (now renamed Eligible Energy Technology Standard or EETS) compliance since 2007. The cost to implement the CFS on an hourly basis as proposed by the Department would be significant to our customers, as we discuss below, such that we would not have expressed our support of the CFS if the statute required an hourly demonstration requirement.

Finally, to the extent that the Commission decides to further explore hourly matching for CFS compliance purposes, the Department's proposed implementation requires clarification.

## **B. Annual Measurement is the Long-Standing Standard**

There is a historical precedent of nearly 20 years of demonstrating compliance on an annual, not hourly, basis reporting under Minn. Stat. § 216B.1691, subd. 2a. Utilities are required to demonstrate compliance with the EETS<sup>3</sup> and the Solar Energy Standard (SES)<sup>4</sup> on an annual compliance reporting basis per the Department-developed reporting template.

Additional language in statute also supports a continuation of annual compliance tracking and reporting. Minn. Stat. § 216B.1691 subd. 2d(2) clearly articulates that the Commission is required to allow for partial compliance with Minn. Stat. § 216B.1691

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<sup>2</sup> See Minn. Stat. § [216B.1691](#), subd. 2g.

<sup>3</sup> See Minn. Stat. § [216B.1691](#), subd. 2a.

<sup>4</sup> See Minn. Stat. § [216B.1691](#), subd. 2f.

subd. 2g Carbon-free standard from the *annual* net purchases made from the regional transmission organization (RTO) based on the RTO's systemwide *annual* fuel mix or an applicable subregional fuel mix:

(ii) an electric utility's *annual* purchases from a regional transmission organization net of the electric utility's sales to the regional transmission organization, but only for the percentage of *annual* net purchases that is carbon-free, which percentage the commission must calculate based on the regional transmission organization's systemwide *annual* fuel mix or an applicable subregional fuel mix.<sup>5</sup> [Emphasis added]

Per the statute, a utility's purchases and sales cannot be assigned a partial compliance determination on an hourly basis but rather must be assigned partial compliance based on annual net purchases. Neither can purchases and sales be tracked independently of each other for compliance purposes, which could be required under the Department's proposed hourly tracking requirement. Rather, the above language makes clear that partial compliance must be attributed to the annual purchases made from an RTO net of the annual sales to the RTO. Notwithstanding the statutory language, MISO does not currently track hourly average fuel mixes that could be applied to net purchases for partial compliance demonstrations purposes for any given hour.

In the new subd. 2g establishing the CFS, the Legislature maintained the same language as in subd. 2a for the EETS, requiring that compliance with the CFS be measured "by the end of the year indicated." This indicates that compliance with both the EETS and the CFS must be demonstrated annually. Any change to this would have been a dramatic departure from prior statute and the precedent of almost 20 years of EETS compliance. The Legislature had the opportunity to make such a change and chose not to. Any suggestion that the Legislature intended hourly accounting is not supported by the explicit statutory text or decades of precedent from the RES.

### **C. Commission Authority is Limited to the Statutory Intent**

The Department attempts to ignore the plain language of the statute and suggests that the Commission use its authority to establish a compliance standard that is demonstrably higher and different than the Legislature intended, arguing:

Notably, Minn. Stat. § 216B.1691, subd. 2d(a), provides the Commission with the authority to issue orders "detailing the criteria and standards used to [...] measure an electric utility's efforts to meet" the CFS. A requirement to use hourly matching is consistent with this grant of statutory authority, and, as explained below, would lead

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<sup>5</sup> See Minn. Stat. § [216B.1691](#), subd. 2d(b)(2).

to more accurate data and is more likely to achieve the ultimate goal of shifting energy generation to carbon-free technology.<sup>6</sup>

We disagree with the Department’s expansive interpretation. Applying Minnesota law for discerning legislative intent,<sup>7</sup> the Department’s proposed extension to hourly tracking is inconsistent with Legislative intent and improperly expands the authority granted to the Commission. Minnesota Statutes Section 645.16 legislates the framework to be used when interpreting statutory provisions. The Statute states: “[e]very law shall be construed, if possible, to give effect to all its provisions.” Minnesota Supreme Court also confirms that it will “read a statute as a whole and give effect to all its provisions” and rejects arguments or interpretations that omit statutory language.<sup>8</sup>

Here, the Department’s statutory interpretation is similarly flawed: it misinterprets the Commission’s directive to “detail criteria and standards” for the measuring compliance with the CFS in a way that ignores the explicit annual (or yearly) framework set forth in Minn. Stat. § 216B.1691. As detailed more fully in the utility Joint Reply Comments (Joint Comments), the statutory language implementing the CFS and other clean-energy standards is focused on annual compliance, and this annual compliance framework is consistent with the Commission’s precedent implementing the EETS and the SES. For this reason, we agree with the Joint Commenters that the Department’s proposal for hourly matching ignores this statutory language and past precedent and focuses exclusively on the generic requirement that the Commission develop ‘standards and criteria’ for implementing the CFS. This generic language for standards and criteria cannot be reasonably read as an invitation to ignore the rest of the statute or Commission precedent that points to annual compliance – nor as license to make a dramatic departure from precedent when there is no indication the Legislature intended such a departure. The intent of the CFS statute is clear that compliance tracking is on an annual, not hourly basis, and nothing therein implies that the Commission has the authority to change this intent.

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<sup>6</sup> DOC Initial Comments at 8.

<sup>7</sup> See Minn. Stat. § 645.16.

<sup>8</sup> *Hibbing Taconite Co. v. Comm’r of Revenue*, 958 N.W.2d 325, 329-30 (Minn. 2021); citing *Waters v. Comm’r of Revenue*, 920 N.W.2d 613-615 (Minn. 2018) (internal citations omitted). In *Hibbing Taconite Co.*, the Minnesota Supreme Court analyzed a tax appeal and rejected a party’s interpretation of the controlling statute because it “improperly narrow[ed] the focus” and failed to give effect to other words in the statute.

## **D. The Department's Proposal Would Increase Costs for Customers**

As discussed in the Joint Comments filed March 19, 2025, in addition to being contrary to the plain wording of the statute, the Department's proposal is potentially very costly for customers. This is because, to comply on a 24/7 basis, Minnesota utilities would either have to compete, at potentially high prices, in hourly REC/AEC markets that are currently non-existent, or build out significantly more carbon free and storage resources than would be cost-effective to meet customers' energy requirements – inappropriately increasing costs for our customers.

We base this conclusion on work we have conducted to explore hourly energy credit tracking for a voluntary customer program, and for the federal 45V hydrogen production tax credit – in addition to modeling we performed specifically for purposes of these Reply Comments. It is important to understand that hourly energy credit tracking in those applications would have significantly different implications than hourly energy credit tracking in the CFS. Voluntary customer programs provide the option for hourly credit tracking for select customers that are willing to pay a premium, whereas hourly credit tracking in the context of the CFS would mandate that premium be applied to all customers. Building out renewable resources beyond the levels needed to meet customers' energy needs purely to meet an arbitrary hourly matching view for CFS compliance would harm customers through higher costs for both the renewable resources and the myriad of transmission investments that would be necessary to support the increased level of resources.

### *1. Commission Order to Investigate Hourly Carbon Free Energy Program Offering*

The Commission has indicated interest in the development of a program to provide one hundred percent carbon free energy recognizing that some customers may be interested in participating in such a program. At the February 20, 2025 Commission hearing on the Company's 2024-2040 Upper Midwest Integrated Resource Plan (IRP), the Company was ordered to evaluate the development of a voluntary customer product for hourly carbon-free energy.<sup>9</sup> While our analysis for Government Services Administration (GSA) suggests such a product might be fairly expensive, a voluntary offering may be appropriate: some sustainability-minded customers might choose to incur the extra cost. This approach is preferable to imposing a costly or infeasible hourly approach on all customers.

The 45V hydrogen Production Tax Credits also incorporates hourly tracking. We were not opposed to hourly requirements in this context but were similarly concerned

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<sup>9</sup> IRP Docket, Pending written Commission orders.

with the additional costs it would incur. A Wood Mackenzie study calculated a 68-175 percent levelized cost of hydrogen (LCOH) increase between annual and hourly match scenarios.<sup>10</sup>

The application of hourly credits for voluntary programs for large customers that want to pay a premium to move beyond renewable energy targets, and for emerging large load industries that have flexibility in production time and needs, is very different from requiring hourly credits for compliance with a state CFS which would impact all of our customers with the resulting additional costs. The cost impacts of providing carbon free energy 24/7 to voluntary subscribers for a small to mid-size load as was evaluated for the GSA program, has very different costs implications than providing carbon free energy 24/7 for the entire Minnesota system.

#### **E. The Department's Proposal Would Require the Establishment of Hourly Markets**

The Department's hourly tracking proposal requires relying on the purchase of hourly RECs or AEC's if needed for compliance demonstration purposes with the CFS. One significant problem with this approach is that hourly REC/AEC markets do not currently exist. No other state in the U.S. has adopted hourly credit requirements as part of a renewable or carbon free standard. Lacking such a national or regional market, Minnesota utilities required to comply with the CFS on an hourly basis would only be able to trade with each other. However, there could be a significant number of hours in a year when REC/AEC production is low statewide – for example, at times of low wind and solar generation – leaving all Minnesota's utilities who are subject to the CFS needing hourly RECs/AECs for the same hours, with no one having any surplus RECs/AECs to sell to each other. Utilities would not be able to purchase hourly RECs/AECs on the open market due to the lack of an existing hourly market. Even if one utility had excess RECs/AECs to sell, the demand would drive up the cost of the RECs/AECs with the burden being borne by ratepayers.

The concept of hourly trading of RECs/AECs with only Minnesota utilities participating results in an inefficient market. Until such time as an hourly market is developed at the regional or national level, it would be cost-ineffective and a burden to our ratepayers to require hourly matching.

Even if hourly REC/AEC markets have matured by the time hourly CFS compliance

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<sup>10</sup> Wood Mackenzie, Green Hydrogen: What the Inflation Reduction Act Means for Production Economics and Carbon Intensity, (March 14, 2023), available at <https://www.woodmac.com/news/opinion/green-hydrogen-IRA-production-economics/>



would be required, it is unlikely that there will be fully developed markets with a large number of buyers and sellers providing market liquidity. In addition to all the Minnesota regulated utilities needing RECs/AECs for the same hours of low renewable generation, there will likely continue to be additional voluntary purchasers of RECs/AECs in Minnesota -- for example, large customers like data centers and hydrogen producers seeking to demonstrate 24/7 clean electricity for their own goals -- and those purchasers would be competing with Minnesota utilities for the same, potentially limited supply of hourly RECs/AECs, further driving up the price.

The Department proposes that hourly matching be required beginning in the year 2035. This does not provide enough time to add sufficient storage or other clean firm resources to alleviate the need to rely on a non-existent hourly REC/AEC market. The Department acknowledges the lack of an existing market and problems that will need to be solved.<sup>11</sup> They propose monitoring the status of Energy Alternative Certificate (EAC) markets, which can either refer to RECs or AECs or a combination thereof, for three years, suggest the Commission open a new docket on the matter of hourly trading, and establish the rules of hourly trading of EACs in 2029 thereby acknowledging that there is not enough information at this time. The Department also acknowledges that hourly matching may increase ratepayers' costs and that it is important to not subject ratepayers to under financial burden.<sup>12</sup> We wholeheartedly agree. Our customers should not have to shoulder the increased costs associated with exploring the feasibility of hourly matching and for gathering additional information on how well utility systems in the state of Minnesota are positioned to meet an hourly matching requirement.

The CFS statute directs the Commission to develop “criteria and standards that protect against undesirable impacts on the reliability of the utility's system and economic impacts on the utility's ratepayers and that consider technical feasibility.”<sup>13</sup> The scenario outlined here – ignoring the technical feasibility of a scheme reliant on an hourly credit market that is today non-existent or at best nascent, and creating a situation where a very small number of market participants (the regulated utilities) all compete for a limited supply of RECs/AECs in the same hours, driving up the cost of compliance passed on to their customers – seems to directly contravene that Legislative direction.

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<sup>11</sup> DOC Initial Comments at 12.

<sup>12</sup> DOC Initial Comments at 20

<sup>13</sup> Minn. Stat. § [216B.1691](#), subd. 2d(b)(1).

## **F. Xcel Energy's Experience with, and Cost Implications of, Hourly Tracking**

Until recently, the Company was collaborating with the GSA to develop a voluntary customer program for customers interested in securing one hundred percent carbon free energy on an hourly basis. As part of the analysis undertaken to develop a potential program, the Company considered the impact of serving the GSA load in our service territory on an hourly basis. To conduct this analysis, the Company used the Encompass model and assumptions from our IRP to evaluate the impact of serving the GSA load in our service territory with carbon-free energy on an hourly basis.

Based on a similar approach used for the GSA analysis, to evaluate the Department's proposal we conducted an analysis of the impacts of an hourly matching requirement by modeling a scenario in Encompass that requires all of our Minnesota load to be served by carbon-free energy on an hourly basis by 2040. We enforced this constraint consistent with the legislation by requiring an interim requirement of 80 percent carbon-free by 2030 and 90 percent carbon-free by 2035. We allowed the Encompass model to optimize resource additions, including solar, wind, and storage to meet these constraints. Consistent with the analysis conducted in collaboration with the GSA, a 100 percent carbon-free energy requirement results in significantly increased costs and an overbuild of resources. In order to meet the 2040 goal, our analysis shows that we would need to add an incremental 17,700 MWs of battery storage and over 4,000 MW of incremental solar resources, both which would require significant acreage, above the amount included in our recently approved IRP. As a result, in 2040 the revenue requirement associated with this overbuild of resources would be over 60 percent higher than the costs included in our IRP without providing additional energy or capacity benefits for our customers. These resources would go beyond our actual system needs and transmission and infrastructure costs would be in addition to this. Such a requirement would have significant impacts on customer rates. More analysis of the potential rate impacts of an hourly requirement should be undertaken to fully understand the impact to customers before implementation of an hourly matching compliance methodology.

The implementation of hourly matching, given the lack of any hourly REC and/or AEC trading markets, would force the deployment of existing storage technology at a high price, rather than waiting for cost-effective alternate storage and clean firm generation options that are not broadly available or cost-effective today. We would already be including additional clean firm resources and storage at a greater scale in our resource plans if they were cost-effective. These additional overbuilt storage costs would increase rates borne by our customers.

The Company demonstrated in our recently approved IRP that we can comply with the CFS on an annual basis at reasonable cost<sup>14</sup>--- which no one disputed there. The Department's proposed approach would require us to dramatically increase installed capacity of clean energy resources and energy storage, at significantly increased costs to our customers, in order to comply in a manner never contemplated by the Legislature in enacting the CFS. As developing technologies evolve and become cost-effective, they will be incorporated into our resource planning process as new resources are required. We prefer to incorporate resources as technology develops and becomes cost-effective rather than forcing cost-ineffective build out of new resources.

### **G. Limiting REC Purchases to the Midwest Market**

The Department also recommends that “the Commission order that all AECs retired to demonstrate CFS compliance be generated within the Midwest Region, as defined by 26 CFS Ch. I, Sch. A, § 1.45V-4 Paragraph (d)(2)(ix), or meet the 45V requirements for interregional delivery, as defined by 26 CFS Ch. I, Sch. A, § 1.45V-4 Paragraph (d)(3)(iii)(B).”<sup>15,16</sup> The Department acknowledges that it may not be possible to rely on the ability to purchase RECs/AECs from the Midwest Region and indicate in their Comments that they intend to submit additional comments regarding off ramps in Round four of comments in this docket.<sup>17</sup> We concur with the Department that it may not be possible to rely on the purchase of RECs from only the Midwest region REC market. As a result, limiting REC purchases to the Midwest on top of requiring hourly matching would make demonstrating compliance even more difficult and costly. The Department recognizes that in this situation, utilities may need to rely on the off-ramp process as part of the compliance demonstration process.

As it pertains to the CFS, carbon dioxide is a global pollutant and thus, limiting the area of REC/AEC purchases to the Midwest has no added benefit to the environment. Limiting purchases to the Midwest could however affect the price utilities need to pay for RECs/AECs and thus could ultimately impact ratepayers -- especially so if the Commission decides to require hourly matching. With no clear benefit to the environment and potential negative consequences to ratepayers, we encourage the Commission to allow the purchase of RECs/AECs for compliance purposes to the entire United States and to not limit REC/AEC purchases to the

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<sup>14</sup> Docket No. E002/RP-24-67 *2024-2040 Upper Midwest Integrated Resource Plan Appendices A Through N Corrected, Table N-1* (February 2, 2024) eDocket No. 20242-203057-01 (IRP Docket.)

<sup>15</sup> DOC Initial Comments at 14, Docket No. E999/CD-23-151, January 29, 2025 (DOC Initial Comments).

<sup>16</sup> 26 CFR Ch. I, Sch. A, § 1.45V-4

<sup>17</sup> The Company is also concerned with how the Department's proposal would relate to matters of interstate commerce.

Midwest.

The intent of the CFS is for utilities to demonstrate compliance by generating or procuring 100 percent carbon free energy for their Minnesota customers, on an annual basis, by 2040. The compliance demonstration process requirements should not be established in such a manner that requires all utilities to rely on an off-ramp in order to avoid the high costs and/or reliability challenges which would be caused by the implementation of hourly matching. The intent of the off-ramp process was to recognize potential concerns pertaining to reliability and cost impacts associated with the implementation of the CFS. Implementation of the CFS requiring hourly true-up processes would likely require each and every utility to rely on off-ramps for compliance demonstration. Setting up an approach to compliance at this time that would require routine reliance on off-ramps would seem to undermine the core objectives of the Legislature and Governor in passing the CFS.

## **H. Miscellaneous**

### *1. Shelf Life of RECs*

Currently, RECs can be used in the year that they are generated or can be banked for a period of up to four years per the Commission's December 18, 2007 Order.<sup>18</sup> In their comments, the Department recommends that the Commission rescind this order effective January 1, 2030. While no clear reason is given for the need of the rescission, it is presumed that the suggestion is based on the Department's proposal to require hourly accounting which would not align with the ability to use RECs for up to four years from the date of issuance. However, the Department suggests that the Order be rescinded even if hourly accounting is not implemented by the Commission yet articulates no reasoning or need for the rescission. There is a long-established precedent allowing for a four-year shelf life of RECs and no indication that the legislature intended any change to that precedent.

### *2. Other Areas of Alignment and Non-alignment*

We disagree with the CEOs' suggestion that the preparedness demonstration be conducted based on time-matching. The preparedness discussion should be a simple demonstration comparing forecast retail sales in Minnesota to Minnesota allocated

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<sup>18</sup> *In the Matter of a Commission Investigation into a Multi-State Tracking and Trading System for Renewable Energy Credits* and *In the Matter of Detailing Criteria and Standards for Measuring an Electric Utility's Good Faith Efforts in Meeting the Renewable Energy Objectives Under Minn. Stat. §216B.1691*, Minnesota Public Utilities Commission, Order Establishing Initial Protocols for Trading Renewable Credits, December 18, 2007, Docket Nos. E999/CI-04-1616 and E999/CI-03-869, (eDockets) 4872138

forecast carbon free energy.<sup>19</sup> A discussion regarding line losses is unnecessary.

Compliance demonstration should begin in 2030 as outlined by statute, not in 2029 for generation year 2028 as suggested by the Department. The statute's first compliance year is 2030;<sup>20</sup> there is nothing to suggest the Legislature's direction to the Commission to "issue necessary orders detailing the criteria and standards" for compliance extends to accelerating the compliance mandate itself.

We disagree with the CEO's recommendation that energy sales to the RTO should be excluded from compliance demonstration and preparedness demonstrations. It is our understanding that sales and purchases to the RTO will be addressed in Docket No. E-999/CI-24-352 Fuel Life Cycle Analysis Framework for Utility Compliance with Minnesota's Carbon-Free Standard, and we will address this in more detail there.

We concur with the Department's proposal to require hourly modeling in Integrated Resource Plans, consistent with the Company's recently concluded IRP modeling, but not to conduct hourly matching for preparedness demonstration purposes.

Finally, we agree with the CEOs that the Commission should calculate partial compliance credit for MISO purchases based upon the annual MISO North subregion carbon-free share of the subregional generation mix.

## CONCLUSION

Minnesota is leading the nation with the earliest 100 percent carbon-free mandate of any state. We can achieve this ambitious goal at reasonable cost to customers while preserving reliability as demonstrated in our recently approved 2024-2040 Integrated Resource Plan— *if* the CFS is implemented as the Legislature intended.

To the contrary, hourly tracking is inconsistent with the plain language of the statute, Legislative intent, and 20 years of compliance history and will require utilities to overbuild resources or rely on a non-existent hourly REC/AEC market.

We urge the Commission to implement the annual CFS compliance reporting mechanism that is in alignment with the statutory intent and allows Minnesota to demonstrate success in implementing this nation-leading policy.

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<sup>19</sup> Clean Energy Organizations, Docket No. E999/CI-23-151, January 29, 2025 (CEO Initial Comments)

<sup>20</sup> Minn. Stat. § 216B.1691, subd. 2g.

Dated: March 19, 2025

Northern States Power Company

## CERTIFICATE OF SERVICE

I, Victor Barreiro, hereby certify that I have this day served copies of the foregoing document on the attached list of persons.

xx by depositing a true and correct copy thereof, properly enveloped with postage paid in the United States mail at Minneapolis, Minnesota

xx electronic filing

**DOCKET No.      E999/CI-23-151**

Dated this 19<sup>th</sup> day of March 2025

/s/

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Victor Barreiro  
Regulatory Administrator

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16	Todd	Beck	tbeck@grenergy.com			null null, null United States	Electronic Service		No	23-151Official
17	Brian	Bell	bell.brian@dorsey.com	Dorsey & Whitney LLP		50 South Sixth St. Suite 1500 Minneapolis MN, 55402 United States	Electronic Service		Yes	23-151Official
18	Amadeo	Bellino	amadeo.bellino@whiteearth-nsn.gov	White Earth Nation		White Earth Tribal Headquarters 35500 Eagle View Road Ogema MN, 56569 United States	Electronic Service		No	23-151Official
19	David	Bender	dbender@earthjustice.org	Earthjustice		1001 G Street NW Suite 1000 Washington DC, 20001 United States	Electronic Service		No	23-151Official
20	Melanie	Benjamin	melanie.benjamin@millelacsband.com			43408 Oodena Drive Onamia MN, 56359 United States	Electronic Service		No	23-151Official
21	James J.	Bertrand	james.bertrand@stinson.com	STINSON LLP		50 S 6th St Ste 2600 Minneapolis MN, 55402 United States	Electronic Service		No	23-151Official
22	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	23-151Official
23	Seth	Bichler	sethbichler@fdlrez.com	Fond du Lac Band of Lake Superior Chippewa		1720 Big Lake Rd Cloquet MN, 55720 United States	Electronic Service		No	23-151Official
24	Laura	Bishop	laura.bishop@state.mn.us		Minnesota Pollution Control Agency	520 Lafayette Rd Saint Paul MN, 55155 United States	Electronic Service		No	23-151Official
25	William	Black	bblack@mmua.org	MMUA		Suite 200 3131 Fernbrook Lane North Plymouth MN, 55447 United States	Electronic Service		No	23-151Official
26	Hunter	Boldt	hunterboldt@redlakenation.org	Red Lake Nation		15484 Migizi Drive Red Lake MN, 56671 United States	Electronic Service		No	23-151Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
27	Peter	Boney	pboney@boisforte-nsn.gov	Bois Forte Band of Chippewa		Bois Forte Tribal Government 5344 Lakeshore Drive Nett Lake MN, 55772 United States	Electronic Service		No	23-151Official
28	Jerry	Bormann	jbormann@mpsutility.com	Moorhead Public Service Commission (E)		500 Center Ave PO Box 779 Moorhead MN, 56561-0779 United States	Electronic Service		No	23-151Official
29	Sheldon	Boyd	sheldon.boyd@millelacsband.com	Mille Lacs Band of Ojibwe		43408 Oodena Drive Onamia MN, 56359 United States	Electronic Service		No	23-151Official
30	Jon	Brekke	jbrekke@grenergy.com	Great River Energy		12300 Elm Creek Boulevard Maple Grove MN, 55369-4718 United States	Electronic Service		No	23-151Official
31	Mark B.	Bring	mbring@otpc.com	Otter Tail Power Company		215 South Cascade Street PO Box 496 Fergus Falls MN, 56538-0496 United States	Electronic Service		No	23-151Official
32	Matthew	Brodin	mbrodin@allete.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	23-151Official
33	B. Andrew	Brown	brown.andrew@dorsey.com	Dorsey & Whitney LLP		Suite 1500 50 South Sixth Street Minneapolis MN, 55402-1498 United States	Electronic Service		No	23-151Official
34	Danny	Brown	dbrown@eastriver.coop	East River Electric Power Cooperative, Inc.		P.O. Box 227 211 S. Harth Ave. Madison SD, 57042 United States	Electronic Service		No	23-151Official
35	Marvin Ray	Bruneau	marvin.bruneau@millelacsband.com	Mille Lacs Band of Ojibwe		43408 Oodena Drive Onamia MN, 56359 United States	Electronic Service		No	23-151Official
36	Christina	Brusven	cbrusven@fredlaw.com	Fredrikson Byron		60 S 6th St Ste 1500 Minneapolis MN, 55402-4400 United States	Electronic Service		No	23-151Official
37	Scott	Buchanan	scottbuchanan@fdlrez.com	Fond du Lac Band of Lake Superior Chippewa		1720 Big Lake Road Cloquet MN, 55720 United States	Electronic Service		No	23-151Official
38	Shelley	Buck	shelley.buck@piic.org	Prairie Island Indian Community		Prairie Island Indian Community 5636 Sturgeon Lake Road Welch MN,	Electronic Service		No	23-151Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						55089 United States				
39	John	Bucknell		Virtus Solis Technologies, Inc.		1511 Pebble Point Drive Troy MI, 48085 United States	Paper Service		No	23-151Official
40	Robert	Budreau	robert.budreau@llojbwe.net	Leech Lake Band of Ojibwe		190 Sailstar Drive NW Cass Lake MN, 56633 United States	Electronic Service		No	23-151Official
41	Brian	Burandt	brian.burandt@connexusenergy.com	Connexus Energy		14601 Ramsey Blvd Ramsey MN, 55303 United States	Electronic Service		No	23-151Official
42	Jessica	Burdette	jessica.burdette@state.mn.us		Department of Commerce	85 7th Place East Suite 500 St. Paul MN, 55101 United States	Electronic Service		No	23-151Official
43	Richard	Burud	rgburud@msn.com	Southern Minnesota Energy Cooperative		31110 Cooperative Way Rushford MN, 55971 United States	Electronic Service		No	23-151Official
44	Jennifer	Cady	jjcady@mnpower.com	Minnesota Power		30 W Superior St Duluth MN, 55802 United States	Electronic Service		No	23-151Official
45	James	Canaday	james.canaday@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	Suite 1400 445 Minnesota St. St. Paul MN, 55101 United States	Electronic Service		Yes	23-151Official
46	Thomas	Carlson	thomas.carlson@edf-re.com	EDF Renewable Energy		10 2nd St NE Ste. 400 Minneapolis MN, 55413 United States	Electronic Service		No	23-151Official
47	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	23-151Official
48	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	23-151Official
49	Cathy	Chavers	cchavers@boisforte-nsn.gov	Bois Forte Band of Chippewa		Bois Forte Tribal Government 5344 Lakeshore Drive Nett Lake MN, 55772 United States	Electronic Service		No	23-151Official
50	Marc	Child	mchild@grenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	23-151Official
51	Michael	Childs, Jr.	michael.childsjr@piic.org	Prairie Island Indian Community		Prairie Island Indian Community 5636 Sturgeon Lake Road	Electronic Service		No	23-151Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						Welch MN, 55089 United States				
52	Ray	Choquette	rchoquette@agp.com	Ag Processing Inc.		12700 West Dodge Road PO Box 2047 Omaha NE, 68103-2047 United States	Electronic Service		No	23-151Official
53	Steve W.	Chriss	stephen.chriss@walmart.com	Wal-Mart		2001 SE 10th St. Bentonville AR, 72716-5530 United States	Electronic Service		No	23-151Official
54	John	Coffman	john@johncoffman.net	AARP		871 Tuxedo Blvd. St. Louis MO, 63119-2044 United States	Electronic Service		No	23-151Official
55	Kenneth A.	Colburn	kcolburn@symbioticstrategies.com	Symbiotic Strategies, LLC		26 Winton Road Meredith NH, 32535413 United States	Electronic Service		No	23-151Official
56	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	23-151Official
57	Jean	Comstock	jean.comstock.dbcc@gmail.com	St. Paul 350		729 6th St E St. Paul MN, 55106 United States	Electronic Service		No	23-151Official
58	Christopher	Cooper	chris.cooper@resource-solutions.org			1012 Torney Avenue San Francisco CA, 94129 United States	Electronic Service		No	23-151Official
59	Hillary	Creurer	hcreurer@allete.com	Minnesota Power		30 W Superior St Duluth MN, 55802 United States	Electronic Service		No	23-151Official
60	George	Crocker	gwillc@nawo.org	North American Water Office		5093 Keats Avenue Lake Elmo MN, 55042 United States	Electronic Service		No	23-151Official
61	Rebecca	Crooks Stratton	rebecca.crooks-stratton@shakopeedakota.org	Shakopee Mdewakanton Sioux Community		Shakopee Mdewakanton Sioux Community 2330 Sioux Trail NW Prior Lake MN, 55372 United States	Electronic Service		No	23-151Official
62	Brooke	Cunningham	health.review@state.mn.us	Minnesota Department of Health		PO Box 64975 St. Paul MN, 55164-0975 United States	Electronic Service		No	23-151Official
63	Stacy	Dahl	sdahl@minnkota.com	Minnkota Power Cooperative, Inc.		5301 32nd Ave S Grand Forks ND, 58201 United States	Electronic Service		No	23-151Official
64	Michael	Daley	mdaley@carbonsolutionsgroup.com	Carbon Solutions Group LLC		2045 W Grand Ave. Ste B PMB #58751 Chicago IL, 60612 United States	Electronic Service		No	23-151Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
65	Lorene	Damsits	lorened@cmpasgroup.org	Central MN MPA		459 S Grove St Blue Earth MN, 56013 United States	Electronic Service		No	23-151Official
66	Lisa	Daniels	lisadaniels@windustry.org	Windustry		201 Ridgewood Ave Minneapolis MN, 55403 United States	Electronic Service		No	23-151Official
67	Miyah	Danielson	miyahdanielson@fdlrez.com	Fond du Lac Band of Lake Superior Chippewa		1720 Big Lake Road Cloquet MN, 55720 United States	Electronic Service		No	23-151Official
68	Chris	Davis	christopher.davis@state.mn.us		Department of Commerce	Suite 280 85 Seventh Place East St. Paul MN, 55101-2198 United States	Electronic Service		No	23-151Official
69	Rob	Davis	rob@mrets.org	M-RETS		60 S 6th Street Suite 2800 Minneapolis MN, 55402 United States	Electronic Service		No	23-151Official
70	Jason	Decker	jason.decker@llojibwe.net	Leech Lake Band of Ojibwe		190 Sailstar Drive NW Cass Lake MN, 56633 United States	Electronic Service		No	23-151Official
71	James	Denniston	james.r.denniston@xcelenergy.com	Xcel Energy Services, Inc.		414 Nicollet Mall, 401-8 Minneapolis MN, 55401 United States	Electronic Service		No	23-151Official
72	Bobby	Deschampe	robertdeschampe@grandportage.com	Grand Portage Band of Lake Superior Chippewa		PO Box 428 Grand Portage MN, 55605 United States	Electronic Service		No	23-151Official
73	Curt	Dieren	curt.dieren@dgr.com	L&O Power Cooperative		1302 S Union St Rock Rapids IA, 51246 United States	Electronic Service		No	23-151Official
74	Kami	Diver	kamidiver@fdlrez.com	Fond du Lac Band of Lake Superior Chippewa		1720 Big Lake Road Cloquet MN, 55720 United States	Electronic Service		No	23-151Official
75	Becky	Dobbs	bdobbs@greenergy.com			null null, null United States	Electronic Service		No	23-151Official
76	J.	Drake Hamilton	hamilton@fresh-energy.org	Fresh Energy		408 St Peter St Ste 350 Saint Paul MN, 55101 United States	Electronic Service		No	23-151Official
77	Shane	Drift	sdrift@boisforte-nsn.gov	Bois Forte Band of Chippewa		Bois Forte Tribal Government 5344 Lakeshore Drive Nett Lake MN, 55772 United States	Electronic Service		No	23-151Official
78	Adam	Duininck	aduininck@ncsrcc.org	North Central States Regional Council of Carpenters		700 Olive Street St. Paul MN, 55130 United States	Electronic Service		No	23-151Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
79	Kristin W	Duncanson	kw.duncanson@gmail.com			57746 Highway 30 Mapleton MN, 56065 United States	Electronic Service		No	23-151Official
80	Wally	Dupuis	wallydupuis@fdlband.org	Fond du Lac Band of Lake Superior Chippewa		1720 Big Lake Road Cloquet MN, 55720 United States	Electronic Service		No	23-151Official
81	Kevin	Dupuis, Sr.	kevindupuis@fdlrez.com			Reservation Business Committee 1720 Big Lake Rd Cloquet MN, 55720 United States	Electronic Service		No	23-151Official
82	Brian	Edstrom	briane@cubminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota St Ste W1360 Saint Paul MN, 55101 United States	Electronic Service		No	23-151Official
83	Jamie	Edwards	jamie.edwards@millelacsband.com	Mille Lacs Band of Ojibwe		43408 Oodena Drive Onamia MN, 56358 United States	Electronic Service		No	23-151Official
84	Kristen	Eide Tollefson	healingsystems69@gmail.com	R-CURE		28477 N Lake Ave Frontenac MN, 55026-1044 United States	Electronic Service		No	23-151Official
85	Betsy	Engelking	betsy@nationalgridrenewables.com	National Grid Renewables		8400 Normandale Lake Blvd Ste 1200 Bloomington MN, 55437 United States	Electronic Service		No	23-151Official
86	Michael	Fairbanks	michael.fairbanks@whiteearth-nsn.gov	White Earth Reservation Business Committee		PO Box 418 White Earth MN, 56591 United States	Electronic Service		No	23-151Official
87	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	23-151Official
88	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	23-151Official
89	Terri	Finn	terri.goggleye@llojibwe.net			null null, null United States	Electronic Service		No	23-151Official
90	Mike	Fiterman	mikefiterman@libertydiversified.com	Liberty Diversified International		5600 N Highway 169 Minneapolis MN, 55428-3096 United States	Electronic Service		No	23-151Official
91	Christine	Fox	cfox@itasca-mantrap.com	Itasca-Mantrap Coop. Electric Assn.		PO Box 192 Park Rapids MN, 56470 United States	Electronic Service		No	23-151Official
92	Lucas	Franco	lfranco@liunagroc.com	LIUNA		81 Little Canada Rd E Little Canada	Electronic Service		No	23-151Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						MN, 55117 United States				
93	Ronald J.	Franz	ronald.franz@dairylandpower.com	Dairyland Power Cooperative		3200 East Ave S PO Box 817 La Crosse WI, 54602-0817 United States	Electronic Service		No	23-151Official
94	Nathan	Franzen	nathan@nationalgridrenewables.com	Geronimo Energy, LLC		8400 Normandale Lake Blvd Ste 1200 Bloomington MN, 55437 United States	Electronic Service		No	23-151Official
95	Gary	Frazer	gfrazier@mnchippewatribe.org	Minnesota Chippewa Tribe		PO Box 217 Cass Lake MN, 56633 United States	Electronic Service		No	23-151Official
96	Barb	Freese	bfreese@mncenter.org	Minnesota Center for Environmental Advocacy		1919 University Ave W Ste 515 Saint Paul MN, 55104-3435 United States	Electronic Service		No	23-151Official
97	Christopher	Friez	christopher.friez@nacco.com	NACCO Natural Resources/North American Coal		918 E. Divide Ave., Suite 200 Bismarck ND, 58501 United States	Electronic Service		No	23-151Official
98	Stacey	Fujii	sfujii@grenergy.com	Great River Energy		12300 Elm Creek Boulevard Maple Grove MN, 55369-4718 United States	Electronic Service		No	23-151Official
99	Jessica	Fyhrie	jfyhrie@otpc.com	Otter Tail Power Company		PO Box 496 Fergus Falls MN, 56538-0496 United States	Electronic Service		Yes	23-151Official
100	Edward	Garvey	garveyed@aol.com	Residence		32 Lawton St Saint Paul MN, 55102 United States	Electronic Service		No	23-151Official
101	Benjamin	Gerber	ben@mrets.org	Midwest Renewable Energy Tracking System		60 South Sixth Street Suite 2800 Minneapolis MN, 55402 United States	Electronic Service		No	23-151Official
102	David P.	Geschwind	dp.geschwind@smmpa.org	Southern Minnesota Municipal Power Agency		500 First Avenue SW Rochester MN, 55902 United States	Electronic Service		No	23-151Official
103	Shannon	Geshick	shannon.geshick@state.mn.us	Minnesota Indian Affairs Council (MIAC)		null null, null United States	Electronic Service		No	23-151Official
104	Allen	Gleckner	gleckner@fresh-energy.org	Fresh Energy		408 St. Peter Street Ste 350 Saint Paul MN, 55102 United States	Electronic Service		No	23-151Official
105	Jenny	Glumack	jenny@mrea.org	Minnesota Rural Electric Association		11640 73rd Ave N Maple Grove MN, 55369 United States	Electronic Service		No	23-151Official
106	Julie	Goehring	julie@redriverbasincommission.org			708 70 Ave NW Moorhead	Electronic Service		No	23-151Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						MN, 56560 United States				
107	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	23-151Official
108	Tessa	Haagenson	tessa.haagenson@connexusenergy.com	Connexus Energy		14601 Ramsey Blvd NW Ramsey MN, 55303 United States	Electronic Service		No	23-151Official
109	Jeffrey	Haase	jhaase@grenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	23-151Official
110	Hal	Halpern	halhalpern@clpower.com	Cooperative Light & Power		1554 Hwy 2 PO Box 69 Two Harbors MN, 55616 United States	Electronic Service		No	23-151Official
111	Jeremy	Hamilton	jhamilton@uppersiouxcommunity-nsn.gov	Upper Sioux Community		Upper Sioux Community PO Box 147 Granite Falls MN, 56241 United States	Electronic Service		No	23-151Official
112	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	23-151Official
113	James	Hartson				59931 300th Street Waltham MN, 55982 United States	Paper Service		No	23-151Official
114	Amy	Hastings	amyh@uppersiouxcommunity-nsn.gov	Upper Sioux Community		5722 Travers Lane PO Box 147 Granite Falls MN, 56241 United States	Electronic Service		No	23-151Official
115	Erik	Hatlestad	erik@cureriver.org			117 1st St Montevideo MN, 56265 United States	Electronic Service		No	23-151Official
116	Kim	Havey	kim.havey@minneapolismn.gov	City of Minneapolis		350 South 5th Street, Suite 315M Minneapolis MN, 55415 United States	Electronic Service		No	23-151Official
117	Philip	Hayet	phayet@jkenn.com	J. Kennedy and Associates, Inc.		570 Colonial Park Drive Suite 305 Roswell GA, 30075-3770 United States	Electronic Service		No	23-151Official
118	Adam	Heinen	aheinen@dakotaelectric.com	Dakota Electric Association		4300 220th St W Farmington MN, 55024 United States	Electronic Service		No	23-151Official
119	Annete	Henkel	mui@mutilityinvestors.org	Minnesota Utility Investors		413 Wacouta Street #230 St.Paul MN, 55101 United States	Electronic Service		No	23-151Official



#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
120	Jessy	Hennesy	jessy.hennesy@avantenergy.com	Avant Energy		220 S. Sixth St. Ste 1300 Minneapolis MN, 55402 United States	Electronic Service		No	23-151Official
121	Kristin	Henry	kristin.henry@sierraclub.org	Sierra Club		2101 Webster St Ste 1300 Oakland CA, 94612 United States	Electronic Service		No	23-151Official
122	Benjamin	Hertz	bhertz@bepc.com	Basin Electric Power Cooperative		1717 E Interstate Ave Bismarck ND, 58503 United States	Electronic Service		Yes	23-151Official
123	Holly	Hinman	holly.r.hinman@xcelenergy.com	Xcel Energy		414 Nicollet Mall, 7th Floor Minneapolis MN, 55401 United States	Electronic Service		No	23-151Official
124	Joe	Hoffman	ja.hoffman@smmpa.org	SMMPA		500 First Ave SW Rochester MN, 55902-3303 United States	Electronic Service		No	23-151Official
125	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	23-151Official
126	Ronald	Horman	rhorman@redwoodelectric.com	Redwood Electric Cooperative		60 Pine Street Clements MN, 56224 United States	Electronic Service		No	23-151Official
127	Rick	Horton	rhorton@minnesotaforests.com	Minnesota Forest Industries		324 West Superior Street 903 Medical Arts Building Duluth MN, 55802 United States	Electronic Service		No	23-151Official
128	Robbie	Howe	robbie.howe@llojibwe.net	Leech Lake Band of Ojibwe		190 Sailstar Drive NW Cass Lake MN, 56633 United States	Electronic Service		No	23-151Official
129	John	Ihle	ljihle@rrt.net	PlainStates Energy LLC		27451 S Hwy 34 Barnesville MN, 56514 United States	Electronic Service		No	23-151Official
130	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	23-151Official
131	Faron	Jackson, Sr.	faron.jackson@llojibwe.net			190 Sailstar Drive NW Cass Lake MN, 56633 United States	Electronic Service		No	23-151Official
132	Casey	Jacobson	cjacobson@bepc.com	Basin Electric Power Cooperative		1717 East Interstate Avenue Bismarck ND, 58501 United States	Electronic Service		No	23-151Official
133	Justin	Jahnz	justin.jahnz@ecemn.com	East Central Energy		412 Main Ave N Braham MN,	Electronic Service		No	23-151Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						55006 United States				
134	Alan	Jenkins	aj@jenkinsatlaw.com	Jenkins at Law		2950 Yellowtail Ave. Marathon FL, 33050 United States	Electronic Service		No	23- 151Official
135	Nathan	Jensen	njensen@otpc.com	Otter Tail Power Company		215 S. Cascade St. Fergus Falls MN, 56537 United States	Electronic Service		No	23- 151Official
136	Kevin	Jensvold	kevinj@uppersiouxcommunity-nsn.gov	Upper Sioux Community		PO Box 147 Granite Falls MN, 56241- 0147 United States	Electronic Service		No	23- 151Official
137	Annette	Johnson	annette.johnson@redlakenation.org	Red Lake Nation		15484 Migizi Drive Red Lake MN, 56671 United States	Electronic Service		No	23- 151Official
138	Jody	Johnson	jody.johnson@piic.org	Prairie Island Indian Community		5636 Sturgeon Lake Rd Welch MN, 55089 United States	Electronic Service		No	23- 151Official
139	Johnny	Johnson	johnny.johnson@piic.org	Prairie Island Indian Community		5636 Sturgeon Lake Road Welch MN, 55089 United States	Electronic Service		No	23- 151Official
140	Richard	Johnson	rick.johnson@lawmoss.com	Moss & Barnett		150 S. 5th Street Suite 1200 Minneapolis MN, 55402 United States	Electronic Service		No	23- 151Official
141	Sarah	Johnson Phillips	sjphillips@stoel.com	Stoel Rives LLP		33 South Sixth Street Suite 4200 Minneapolis MN, 55402 United States	Electronic Service		No	23- 151Official
142	Nate	Jones	njones@hcpd.com	Heartland Consumers Power		PO Box 248 Madison SD, 57042 United States	Electronic Service		No	23- 151Official
143	Nick	Kaneski	nick.kaneski@enbridge.com	Enbridge Energy Company, Inc.		11 East Superior St Ste 125 Duluth MN, 55802 United States	Electronic Service		No	23- 151Official
144	Veda	Kanitz	vmkanitz@gmail.com			null null, null United States	Electronic Service		No	23- 151Official
145	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	23- 151Official
146	David	Kempf	dkempf@greenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	23- 151Official
147	William	Kenworthy	will@votesolar.org			1 South Dearborn St Ste 2000 Chicago IL, 60603 United States	Electronic Service		No	23- 151Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
148	Becky	Kern	bkern@bepc.com	Basin Electric Power Cooperative		1717 E Interstate Ave Bismarck ND, 58501 United States	Electronic Service		Yes	23-151Official
149	Samuel B.	Ketchum	sketchum@kennedy-graven.com	Kennedy & Graven, Chartered		150 S 5th St Ste 700 Minneapolis MN, 55402 United States	Electronic Service		No	23-151Official
150	Nazir	Khan	nazir@mnejtable.org	Minnesota Environmental Justice Table		2720 E 22nd St Minneapolis MN, 55406 United States	Electronic Service		No	23-151Official
151	Hudson	Kingston	hudson@curemn.org			PO Box 712 Ely MN, 55731 United States	Electronic Service		No	23-151Official
152	Kate	Knuth	kate.knuth@gmail.com			2347 14th Terrace NW New Brighton MN, 55112 United States	Electronic Service		No	23-151Official
153	Frank	Kohlasch	frank.kohlasch@state.mn.us		Minnesota Pollution Control Agency	520 Lafayette Rd N. St. Paul MN, 55155 United States	Electronic Service		No	23-151Official
154	Brian	Kolbinger	brian@beckertownship.org	Becker Township Board		PO Box 248 12165 Hancock St Becker MN, 55308 United States	Electronic Service		No	23-151Official
155	Seth	Koneczny	st.koneczny@smmpa.org	SMMPA		500 First Avenue, SW Rochester MN, 55902-3303 United States	Electronic Service		No	23-151Official
156	Brian	Krambeer	bkrambeer@mienergy.coop	MiEnergy Cooperative		PO Box 626 31110 Cooperative Way Rushford MN, 55971 United States	Electronic Service		No	23-151Official
157	Randy	Kramer	rlkramer89@gmail.com	Water and Soil Resources Board		42808 Co. Rd. 11 Bird Island MN, 55310 United States	Electronic Service		No	23-151Official
158	Allen	Krug	allen.krug@xcelenergy.com	Xcel Energy		414 Nicollet Mall-7th fl Minneapolis MN, 55401 United States	Electronic Service		No	23-151Official
159	Kay	Kuhlmann	teri.swanson@ci.red-wing.mn.us	City Of Red Wing		315 West Fourth Street Red Wing MN, 55066 United States	Electronic Service		No	23-151Official
160	Brenda	Kyle	bkyle@stpaulchamber.com	St. Paul Area Chamber of Commerce		401 N Robert Street Suite 150 St Paul MN, 55101 United States	Electronic Service		No	23-151Official
161	Therese	LaCanne	tlacanne@grenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	23-151Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
162	Matthew	Lacey	mlacey@grenergy.com	Great River Energy		12300 Elm Creek Boulevard Maple Grove MN, 55369-4718 United States	Electronic Service		No	23-151Official
163	Becky	Lammi	cityclerk@ci.aurora.mn.us	City of Aurora		16 W 2nd Ave N PO Box 160 Aurora MN, 55705 United States	Electronic Service		No	23-151Official
164	Carmel	Laney	carmel.laney@stoel.com	Stoel Rives LLP		33 South Sixth Street Suite 4200 Minneapolis MN, 55402 United States	Electronic Service		No	23-151Official
165	Arthur	LaRose	arthur.larose@llojbwe.net	Leech Lake Band of Ojibwe		190 Sailstar Drive NW Cass Lake MN, 56633 United States	Electronic Service		No	23-151Official
166	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	23-151Official
167	Emily	Larson	elarson@duluthmn.gov	City of Duluth		411 W 1st St Rm 403 Duluth MN, 55802 United States	Electronic Service		No	23-151Official
168	James D.	Larson	james.larson@avantenergy.com	Avant Energy Services		220 S 6th St Ste 1300 Minneapolis MN, 55402 United States	Electronic Service		No	23-151Official
169	Mark	Larson	mlarson@meeker.coop	Meeker Coop Light & Power Assn		1725 Highway 12 E Ste 100 Litchfield MN, 55355 United States	Electronic Service		No	23-151Official
170	Peder	Larson	plarson@larkinhoffman.com	Larkin Hoffman Daly & Lindgren, Ltd.		8300 Norman Center Drive Suite 1000 Bloomington MN, 55437 United States	Electronic Service		No	23-151Official
171	Rachel	Leonard	rachel.leonard@ci.monticello.mn.us	City of Monticello		505 Walnut St Ste 1 Monticello MN, 55362 United States	Electronic Service		No	23-151Official
172	Dan	Leshner	dlesher@grenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	23-151Official
173	Annie	Levenson Falk	annielf@cubminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota Street, Suite W1360 St. Paul MN, 55101 United States	Electronic Service		No	23-151Official
174	Jesse	Levine	jesse_levine@afandpa.org			1101 K St NW Suite 700 Washington DC, 20005 United States	Electronic Service		No	23-151Official
175	Amy	Liberkowski	amy.a.liberkowski@xcelenergy.com	Xcel Energy		414 Nicollet Mall 7th Floor	Electronic Service		No	23-151Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						Minneapolis MN, 55401-1993 United States				
176	Eric	Lindberg	elindberg@mncenter.org	Minnesota Center for Environmental Advocacy		1919 University Avenue West Suite 515 Saint Paul MN, 55104-3435 United States	Electronic Service		No	23-151Official
177	Eric	Lipman	eric.lipman@state.mn.us		Office of Administrative Hearings	PO Box 64620 St. Paul MN, 55164-0620 United States	Electronic Service		Yes	23-151Official
178	Michelle	Lommel	mlommel@grenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	23-151Official
179	Bob	Long	rlong@larkinhoffman.com	Larkin Hoffman (Silicon Energy)		1500 Wells Fargo Plaza 7900 Xerxes Ave S Bloomington MN, 55431 United States	Electronic Service		No	23-151Official
180	Andrea	Lovoll	alovoll@mnejtable.org	Minnesota Environmental Justice Table		2720 E 22nd St. Minneapolis MN, 55406 United States	Electronic Service		No	23-151Official
181	Nicole	Luckey	nluckey@inveneryllc.com	Invenery LLC		1 S. Wacker Suite 1800 Chicago IL, 60606 United States	Electronic Service		No	23-151Official
182	Susan	Ludwig	sludwig@mnpower.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	23-151Official
183	Robert	Lunder	robert.lunder@mdu.com	Montana-Dakota Utilities (ET)		400 N 4th St Bismark ND, 58501 United States	Electronic Service		No	23-151Official
184	Alice	Madden	alice@communitypowermn.org	Community Power		2720 E 22nd St Minneapolis MN, 55406 United States	Electronic Service		No	23-151Official
185	Scott	Magnuson	smagnuson@bpu.org	Brainerd Public Utilities		8027 Highland Scenic Rd Baxter MN, 56425 United States	Electronic Service		No	23-151Official
186	Kavita	Maini	kmains@wi.rr.com	KM Energy Consulting, LLC		961 N Lost Woods Rd Oconomowoc WI, 53066 United States	Electronic Service		No	23-151Official
187	Emily	Marshall	emarshall@jourismarshall.com	Miller O'Brien Jensen, PA		120 S. 6th Street Suite 2400 Minneapolis MN, 55402 United States	Electronic Service		No	23-151Official
188	Mary	Martinka	mary.a.martinka@xcelenergy.com	Xcel Energy Inc		414 Nicollet Mall 7th Floor Minneapolis MN, 55401 United States	Electronic Service		No	23-151Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
189	Gregg	Mast	gmast@cleanenergyeconomymn.org	Clean Energy Economy Minnesota		4808 10th Avenue S Minneapolis MN, 55417 United States	Electronic Service		No	23-151Official
190	Shena	Matrious	shena.matrious@millelacsband.com	Mille Lacs Band of Ojibwe		43408 Oodena Drive Onamia MN, 56349 United States	Electronic Service		No	23-151Official
191	Daryl	Maxwell	dmaxwell@hydro.mb.ca	Manitoba Hydro		360 Portage Ave FL 16 PO Box 815, Station Main Winnipeg MB, R3C 2P4 Canada	Electronic Service		No	23-151Official
192	Tim	McCarthy	tim.mccarthy@siouxvalleyenergy.com	Sioux Valley Southwestern Electric Cooperative, Inc. d/b/a Sioux Valley Energy		null null, null United States	Electronic Service		No	23-151Official
193	Scot	McClure	scotmcclure@alliantenergy.com	Interstate Power And Light Company		4902 N Biltmore Ln PO Box 77007 Madison WI, 53707-1007 United States	Electronic Service		No	23-151Official
194	April	McCormick	aprilm@grandportage.com	Grand Portage Band of Lake Superior Chippewa		PO Box 428 Grand Portage MN, 55605 United States	Electronic Service		No	23-151Official
195	Jess	McCullough	jmccullough@mnpower.com	Minnesota Power		30 W Superior St Duluth MN, 55802 United States	Electronic Service		No	23-151Official
196	Sara G	McGrane	smcgrane@felhaber.com	Felhaber Larson		220 S 6th St Ste 2200 Minneapolis MN, 55420 United States	Electronic Service		No	23-151Official
197	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	23-151Official
198	Harvey	McMahon	hcmahon@otpc.com	Otter Tail Power Company		215 South Cascade Street Fergus Falls MN, 56537 United States	Electronic Service		No	23-151Official
199	Taylor	McNair	taylor@gridlab.org			668 Capp Street San Francisco CA, 94110 United States	Electronic Service		No	23-151Official
200	Ronald	Meier	rmeier@mcleodcoop.com	Mcleod Cooperative Power		3515 11th St East Glencoe MN, 55336 United States	Electronic Service		No	23-151Official
201	Melanie	Mesko Lee	melanie.lee@burnsvillemn.gov	City of Burnsville		100 Civic Center Parkway Burnsville MN, 55337-3867 United States	Electronic Service		No	23-151Official
202	Peder	Mewis	pmewis@cleangridalliance.org	Clean Grid Alliance		570 Asbury St. St. Paul MN,	Electronic Service		No	23-151Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						55104 United States				
203	Joseph	Meyer	joseph.meyer@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	Bremer Tower, Suite 1400 445 Minnesota Street St Paul MN, 55101-2131 United States	Electronic Service		No	23-151Official
204	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	23-151Official
205	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	23-151Official
206	Stacy	Miller	stacy.miller@minneapolismn.gov	City of Minneapolis		350 S. 5th Street Room M 301 Minneapolis MN, 55415 United States	Electronic Service		No	23-151Official
207	David	Moeller	dmoeller@allte.com	Minnesota Power			Electronic Service		No	23-151Official
208	Dalene	Monsebroten	dalene.monsebroten@nmpagency.com	Northern Municipal Power Agency		123 2nd St W Thief River Falls MN, 56701 United States	Electronic Service		No	23-151Official
209	Sarah	Mooradian	sarah@curemn.org	CURE		117 South 1st Street Montevideo MN, 56265 United States	Electronic Service		No	23-151Official
210	Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP		33 South Sixth St Ste 4200 Minneapolis MN, 55402 United States	Electronic Service		No	23-151Official
211	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	23-151Official
212	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	23-151Official
213	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	23-151Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
214	Alan	Muller	alan@greendel.org	Energy & Environmental Consulting		1110 West Avenue Red Wing MN, 55066 United States	Electronic Service		No	23-151Official
215	Sonny	Myers	smyers@1854treatyauthority.org	1854 Treaty Authority		4428 Haines Rd Duluth MN, 55811-1524 United States	Electronic Service		No	23-151Official
216	Ben	Nelson	benn@cmpasgroup.org	CMPMPA		459 South Grove Street Blue Earth MN, 56013 United States	Electronic Service		No	23-151Official
217	Carl	Nelson	cnelson@mncee.org	Center for Energy and Environment		212 3rd Ave N Ste 560 Minneapolis MN, 55401 United States	Electronic Service		No	23-151Official
218	Deb	Nelson	dnelson@grenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	23-151Official
219	David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency		220 South Sixth Street Suite 1300 Minneapolis MN, 55402 United States	Electronic Service		No	23-151Official
220	Duane	Ninneman	duane@cureriver.org	Clean Up the River Environment		117 South 1st St Montevideo MN, 56265 United States	Electronic Service		No	23-151Official
221	Michael	Noble	noble@fresh-energy.org	Fresh Energy		408 Saint Peter St Ste 350 Saint Paul MN, 55102 United States	Electronic Service		No	23-151Official
222	Rolf	Nordstrom	rnordstrom@gpsid.net	Great Plains Institute		2801 21ST AVE S STE 220 Minneapolis MN, 55407-1229 United States	Electronic Service		No	23-151Official
223	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	23-151Official
224	M. William	O'Brien	bobrien@mojlaw.com	Miller O'Brien Jensen, P.A.		120 S 6th St Ste 2400 Minneapolis MN, 55402 United States	Electronic Service		No	23-151Official
225	Ric	O'Connell	ric@gridlab.org	GridLab		2120 University Ave Berkeley CA, 94704 United States	Electronic Service		No	23-151Official
226	Joseph	OBrien	joey.obrien@lowersioux.com			39527 Highway 1 Morton MN, 56270 United States	Electronic Service		No	23-151Official



#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
227	Matthew	Olsen	molsen@otpc.com	Otter Tail Power Company		215 South Cascade Street Fergus Falls MN, 56537 United States	Electronic Service		No	23-151Official
228	Russell	Olson	rolson@hcpd.com	Heartland Consumers Power District		PO Box 248 Madison SD, 57042-0248 United States	Electronic Service		No	23-151Official
229	Debra	Opatz	dopatz@otpc.com	Otter Tail Power Company		215 South Cascade Street Fergus Falls MN, 56537 United States	Electronic Service		No	23-151Official
230	Mikayla	Osterman	mosterman@otpc.com	Otter Tail Power Company		215 S Cascade St PO Box 496 Fergus Falls MN, 56537 United States	Electronic Service		No	23-151Official
231	Jamie	Overgaard	jovergaard@minnkota.com	Minnkota Power Cooperative, Inc.		5301 32nd Ave S Grand Forks ND, 58201 United States	Electronic Service		No	23-151Official
232	Carol A.	Overland	overland@legalelectric.org	Legalelectric - Overland Law Office		1110 West Avenue Red Wing MN, 55066 United States	Electronic Service		No	23-151Official
233	Gregory	Padden	gpadden@grenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	23-151Official
234	Jessica	Palmer Denig	jessica.palmer-denig@state.mn.us		Office of Administrative Hearings	600 Robert St N PO Box 64620 St. Paul MN, 55164 United States	Electronic Service		No	23-151Official
235	Marsha	Parlow	mparlow@grenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	23-151Official
236	Priti	Patel	ppatel@grenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369-4718 United States	Electronic Service		No	23-151Official
237	Gerad	Paul	gpaul@minnkota.com	Minnkota Power Cooperative		5301 32nd Ave S Grand Forks ND, 58201 United States	Electronic Service		No	23-151Official
238	Earl	Pendleton	earl.pendleton@lowersioux.com	Lower Sioux Indian Community		39527 Highway 1 Morton MN, 56270 United States	Electronic Service		No	23-151Official
239	Mary Beth	Peranteau	mperanteau@fredlaw.com	Fredrikson & Byron, P.A.		44 East Mifflin Street Suite 1000 Madison WI, 53703 United States	Electronic Service		No	23-151Official
240	Thom	Petersen	thom.petersen@state.mn.us		Minnesota Department of Agriculture	625 North Robert St Saint Paul MN, 55155 United States	Electronic Service		No	23-151Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
241	Luke	Peterson	luke.peterson@hpuc.com	Hibbing Public Utilities Commission		1902 Sixth Ave E Hibbing MN, 55746 United States	Electronic Service		No	23-151Official
242	Neil	Peterson	info@nclucb.org	Northern Counties Land Use Coordinating Board		null null, null United States	Electronic Service		No	23-151Official
243	DONNA	PICKARD	dpickard@aladdinsolar.com	Genie Solar Support Services		1215 Lilac Lane Excelsior MN, 55331 United States	Electronic Service		No	23-151Official
244	Gordon	Pietsch	gpietsch@grenergy.com	Great River Energy		12300 Elm Creek Blvd. Maple Grove MN, 55369-4718 United States	Electronic Service		No	23-151Official
245	Joe	Plumer	joe.plumer@redlakenation.org	Red Lake Nation		15484 Migizi Drive Red Lake MN, 56671 United States	Electronic Service		No	23-151Official
246	J.	Porter	greg.porter@nngco.com	Northern Natural Gas Company		1111 South 103rd St Omaha NE, 68124 United States	Electronic Service		No	23-151Official
247	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	23-151Official
248	Robert	Prescott	bob.prescott@lowersioux.com	Lower Sioux Indian Community		39527 Highway 1 Morton MN, 56270 United States	Electronic Service		No	23-151Official
249	David	Raatz	draatz@bepc.com	Basin Electric Power Cooperative		1717 East Interstate Avenue Bismarck ND, 58501 United States	Electronic Service		No	23-151Official
250	John C.	Reinhardt		Laura A. Reinhardt		3552 26th Ave S Minneapolis MN, 55406 United States	Paper Service		No	23-151Official
251	Victoria	Reinhardt	victoria.reinhardt@co.ramsey.mn.us	Partnership on Waste and Energy		Ramsey County Board Office 15 W. Kellogg Blvd., Ste. 220 St. Paul MN, 55102 United States	Electronic Service		No	23-151Official
252	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	23-151Official
253	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	23-151Official
254	John	Richards	johnrichards@nweco.com	Northwestern Wisconsin		104 S. Pine St. Grantsburg	Electronic Service		No	23-151Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
				Electric Company		WI, 54840 United States				
255	Greg	Ridderbusch	greg.ridderbusch@connexusenergy.com	Connexus Energy		14601 Ramsey Boulevard Ramsey MN, 55303 United States	Electronic Service		No	23-151Official
256	Susan	Romans	sromans@allete.com	Minnesota Power		30 West Superior Street Legal Dept Duulth MN, 55802 United States	Electronic Service		No	23-151Official
257	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	23-151Official
258	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	23-151Official
259	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	23-151Official
260	Nathaniel	Runke	nrunke@local49.org			611 28th St. NW Rochester MN, 55901 United States	Electronic Service		No	23-151Official
261	Zachary	Ruzycki	zruzycki@grenergy.com	Great River Energy		12300 Elm Creek Boulevard Maple Grove MN, 55369 United States	Electronic Service		No	23-151Official
262	Robert K.	Sahr	bsahr@eastriver.coop	East River Electric Power Cooperative		P.O. Box 227 Madison SD, 57042 United States	Electronic Service		No	23-151Official
263	Todd	Sailer		Minnetonka Power Cooperative		5301 32nd Ave. S Grand Forks ND, 58201 United States	Paper Service		No	23-151Official
264	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	23-151Official
265	Joseph L	Sathe	jsathe@kennedy-graven.com	Kennedy & Graven, Chartered		150 S 5th St Ste 700 Minneapolis MN, 55402 United States	Electronic Service		No	23-151Official
266	Adam	Savariego	adams@uppersiouxcommunity-nsn.gov	Upper Sioux Community		5722 Travers Lane PO Box 147 Granite Falls MN, 56241 United States	Electronic Service		No	23-151Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
267	John	Saxhaug	john_saxhaug@yahoo.com			3940 Harriet Ave Minneapolis MN, 55409 United States	Electronic Service		No	23-151Official
268	Jean	Schafer	jeans@bepc.com	Basin Electric Power Cooperative		1717 E Interstate Ave Bismarck ND, 58501 United States	Electronic Service		No	23-151Official
269	Jeff	Schneider	jeff.schneider@ci.red-wing.mn.us	City of Red Wing		315 West 4th Street Red Wing MN, 55066 United States	Electronic Service		No	23-151Official
270	Kay	Schraeder	kschraeder@minnkota.com	Minnkota Power		5301 32nd Ave S Grand Forks ND, 58201 United States	Electronic Service		No	23-151Official
271	Kathleen	Schuler	keschuler47@gmail.com			1520 10th Ave S #2 Minneapolis MN, 55404 United States	Electronic Service		No	23-151Official
272	Robert H.	Schulte	rhs@schulteassociates.com	Schulte Associates LLC		1742 Patriot Rd Northfield MN, 55057 United States	Electronic Service		No	23-151Official
273	J.P.	Schumacher	jps@mrenergy.com	Missouri River Energy Services		null null, null United States	Electronic Service		No	23-151Official
274	Kevin	Schumacher	kevin@mrets.org	Midwest Renewable Energy Tracking System		null null, null United States	Electronic Service		No	23-151Official
275	Ronald J.	Schwartau	rschwartau@noblesce.com	Nobles Electric Cooperative		22636 U.S. Hwy. 59 Worthington MN, 56187 United States	Electronic Service		No	23-151Official
276	Christine	Schwartz	regulatory.records@xcelenergy.com	Xcel Energy		414 Nicollet Mall FL 7 Minneapolis MN, 55401-1993 United States	Electronic Service		No	23-151Official
277	Douglas	Seaton	doug.seaton@umwlc.org	Upper Midwest Law Center		8421 Wayzata Blvd Ste 300 Golden Valley MN, 55426 United States	Electronic Service		No	23-151Official
278	Dean	Sedgwick	sedgwick@itascapower.com	Itasca Power Company		PO Box 455 Spring Lake MN, 56680 United States	Electronic Service		No	23-151Official
279	Jessie	Seim	jessie.seim@piic.org	Prairie Island Indian Community		5636 Sturgeon Lake Rd Welch MN, 55089 United States	Electronic Service		No	23-151Official
280	Darrell	Seki, Sr.	dseki@redlakenation.org			15484 Migizi Drive Red Lake MN, 56671 United States	Electronic Service		No	23-151Official
281	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	23-151Official
282	Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates		7400 Lyndale Ave S Ste 190	Electronic Service		Yes	23-151Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						Richfield MN, 55423 United States				
283	Bria	Shea	bria.e.shea@xcelenergy.com	Xcel Energy		414 Nicollet Mall Minneapolis MN, 55401 United States	Electronic Service		No	23-151Official
284	Andrew R.	Shedlock	andrew.shedlock@kutakrock.com	Kutak Rock LLP		60 South Sixth St Ste 3400 Minneapolis MN, 55402-4018 United States	Electronic Service		No	23-151Official
285	Doug	Shoemaker	dougs@charter.net	Minnesota Renewable Energy		2928 5th Ave S Minneapolis MN, 55408 United States	Electronic Service		No	23-151Official
286	Beth	Smith	bsmith@greatermankato.com	Greater Mankato Growth		1961 Premier Dr Ste 100 Mankato MN, 56001 United States	Electronic Service		No	23-151Official
287	Joel	Smith	jsmith@mnchippewatribe.org	Minnesota Chippewa Tribe		PO Box 217 Cass Lake MN, 56633 United States	Electronic Service		No	23-151Official
288	Joshua	Smith	joshua.smith@sierraclub.org			85 Second St FL 2 San Francisco CA, 94105 United States	Electronic Service		No	23-151Official
289	Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.		76 W Kellogg Blvd St. Paul MN, 55102 United States	Electronic Service		No	23-151Official
290	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	23-151Official
291	Trevor	Smith	trevor.smith@avantenergy.com	Avant Energy, Inc.		220 South Sixth Street Suite 1300 Minneapolis MN, 55402 United States	Electronic Service		No	23-151Official
292	Roger	Smith, Sr.	rogermsmithsr@fdrez.com			1720 Big Lake Road Cloquet MN, 55720 United States	Electronic Service		No	23-151Official
293	Beth	Soholt	bsoholt@cleangridalliance.org	Clean Grid Alliance		570 Asbury Street Suite 201 St. Paul MN, 55104 United States	Electronic Service		No	23-151Official
294	Anna	Sommer	asommer@energyfuturesgroup.com	Energy Futures Group		PO Box 692 Canton NY, 13617 United States	Electronic Service		No	23-151Official
295	Marie	Spry	mariespry@grandportage.com			PO Box 428 Grand Portage MN, 55605 United States	Electronic Service		No	23-151Official
296	Mark	Spurr	mspurr@fvbenergy.com	International District Energy Association		222 South Ninth St., Suite 825 Minneapolis	Electronic Service		No	23-151Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						MN, 55402 United States				
297	Wallace	St. John, Sr.	wally.stjohn@millelacsband.com	Mille Lacs Band of Ojibwe		43408 Oodena Drive Onamia MN, 56359 United States	Electronic Service		No	23-151Official
298	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	23-151Official
299	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	23-151Official
300	Byron E.	Starns	byron.starns@stinson.com	STINSON LLP		50 S 6th St Ste 2600 Minneapolis MN, 55402 United States	Electronic Service		No	23-151Official
301	Cary	Stephenson	cstephenson@otpc.com	Otter Tail Power Company		215 South Cascade Street Fergus Falls MN, 56537 United States	Electronic Service		Yes	23-151Official
302	Mark	Strohfus	mstrohfus@grenergy.com	Great River Energy		12300 Elm Creek Boulevard Maple Grove MN, 55369-4718 United States	Electronic Service		No	23-151Official
303	James M	Strommen	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered		150 S 5th St Ste 700 Minneapolis MN, 55402 United States	Electronic Service		No	23-151Official
304	Samuel	Strong	sam.strong@redlakenation.org	Red Lake Nation		15484 Migizi Drive Red Lake MN, 56671 United States	Electronic Service		No	23-151Official
305	Kent	Sulem	ksulem@mmua.org			3131 Fernbrook Ln N Ste 200 Plymouth MN, 55447-5337 United States	Electronic Service		No	23-151Official
306	Timothy	Sullivan	tsullivan@whe.org	Wright Hennepin Coop. Electric Assn.		6800 Electric Drive PO Box 330 Rockford MN, 55373 United States	Electronic Service		No	23-151Official
307	David	Sunderman	daves@benco.org	BENCO (DUPLICATE)		PO Box 8 Mankato MN, 56002-0008 United States	Electronic Service		No	23-151Official
308	Eric	Swanson	eswanson@winthrop.com	Winthrop & Weinstine		225 S 6th St Ste 3500 Capella Tower Minneapolis MN, 55402-4629 United States	Electronic Service		No	23-151Official
309	Randy	Synsteliem	rsynsteliem@otpc.com	Otter Tail Power Company		215 S Cascade St Fergus Falls MN, 56537 United States	Electronic Service		No	23-151Official



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323	Michael	Volker	mvolker@eastriver.coop	East River Electric Power Coop		211 S. Harth Ave Madison SD, 57042 United States	Electronic Service		No	23-151Official
324	Toni	Volkmeier	toni.volkmeier@state.mn.us	MPCA		520 Lafayette Rd. N. St. Paul MN, 55155 United States	Electronic Service		No	23-151Official
325	Trent	Waite	twaite@grenergy.com			null null, null United States	Electronic Service		No	23-151Official
326	Laurance R	Waldoch	larrywaldoch@gmail.com	Attorney		2597 Parkview Dr Saint Paul MN, 55110 United States	Electronic Service		No	23-151Official
327	Greg	Wannier	greg.wannier@sierraclub.org	Sierra Club		2101 Webster St Ste 1300 Oakland CA, 94612 United States	Electronic Service		No	23-151Official
328	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	23-151Official
329	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	23-151Official
330	Carol	Westergard	cwestergard@otpc.com	Otter Tail Power Company		215 S Cascade St Fergus Falls MN, 56537 United States	Electronic Service		No	23-151Official
331	Heather	Westra	heather.westra@piic.org	Prairie Island Indian Community		5636 Sturgeon Lake Rd Welch MN, 55089 United States	Electronic Service		No	23-151Official
332	Paul	White	paul.white@prcwind.com	Project Resources Corp./Tamarac Line LLC/Ridgewind		618 2nd Ave SE Minneapolis MN, 55414 United States	Electronic Service		No	23-151Official
333	Steve	White	steve.white@llojibwe.net	Leech Lake Band of Ojibwe		190 Sailstar Drive NW Cass Lake MN, 56633 United States	Electronic Service		No	23-151Official
334	Cody	Whitebear	cody.whitebear@piic.org	Prairie Island Indian Community		5636 Sturgeon Lake Road Welch MN, 55089 United States	Electronic Service		No	23-151Official
335	John	Williams	jwilliams@grenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	23-151Official
336	Laurie	Williams	laurie.williams@sierraclub.org	Sierra Club		Environmental Law Program 1536 Wynkoop St Ste 200 Denver CO, 80202 United States	Electronic Service		No	23-151Official



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337	Virgil	Wind	virgil.wind@millelacsband.com	Mille Lacs Band of Ojibwe		43408 Oodena Drive Onamia MN, 56359 United States	Electronic Service		No	23-151Official
338	Joseph	Windler	jwindler@winthrop.com	Winthrop & Weinstine		225 South Sixth Street, Suite 3500 Minneapolis MN, 55402 United States	Electronic Service		No	23-151Official
339	Robyn	Woeste	robynwoeste@alliantenergy.com	Interstate Power and Light Company		200 First St SE Cedar Rapids IA, 52401 United States	Electronic Service		No	23-151Official
340	Sara	Wolff	sara@mnipl.org			710 Linwood Avenue St Paul MN, 55105 United States	Electronic Service		No	23-151Official
341	Tim	Wulling	t.wulling@earthlink.net			1495 Raymond Ave. Saint Paul MN, 55108 United States	Electronic Service		No	23-151Official
342	Laurie	York	laurie.york@whiteearth-nsn.gov	White Earth Reservation Business Committee		PO Box 418 White Earth MN, 56591 United States	Electronic Service		No	23-151Official
343	Kurt	Zimmerman	kwz@ibew160.org	Local Union #160, IBEW		2909 Anthony Ln St Anthony Village MN, 55418-3238 United States	Electronic Service		No	23-151Official
344	Emily	Ziring	eziring@stlouispark.org	City of St. Louis Park		5005 Minnetonka Blvd St. Louis Park MN, 55416 United States	Electronic Service		No	23-151Official
345	Patrick	Zomer	pat.zomer@lawmoss.com	Moss & Barnett PA		150 S 5th St #1200 Minneapolis MN, 55402 United States	Electronic Service		No	23-151Official