



July 1, 2024

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VIA E-FILING

Will Seuffert
Executive Secretary
Minnesota Public Utilities Commission
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**RE: In the Matter of the Application of Minnesota Power for a Certificate of Need for the HVDC Modernization Project in Hermantown, Saint Louis County
MPUC Docket No. E-015/CN-22-607**

**In the Matter of the Application of Minnesota Power for a Route Permit for a High Voltage Transmission Line for the HVDC Modernization Project in Hermantown, Saint Louis County
MPUC Docket No. E-015/TL-22-611**

Dear Mr. Seuffert:

Enclosed for filing in the above-titled dockets is the Exceptions to the Findings of Fact, Conclusions of Law, and Recommendations of the Administrative Law Judge submitted on behalf of the Large Power Intervenors ("LPI").

By copy of this letter, all parties have been served. A Certificate of Service is also attached.

Sincerely,

Stoel Rives LLP

/s/ Amber S. Lee

Amber S. Lee

ASL:cal
Enclosures

cc: Service Lists

**BEFORE THE MINNESOTA OFFICE OF
ADMINISTRATIVE HEARINGS**

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

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Power for a Certificate of Need for the HVDC
Modernization Project in Hermantown, Saint
Louis County

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Modernization Project in Hermantown, Saint
Louis County

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**LARGE POWER INTERVENORS' EXCEPTIONS TO THE
FINDINGS OF FACT, CONCLUSIONS OF LAW, AND
RECOMMENDATIONS OF THE ADMINISTRATIVE LAW
JUDGE**

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I. INTRODUCTION

The Large Power Intervenors (“LPI”) respectively submit the following Exceptions to the Administrative Law Judge’s (“ALJ”) Findings of Fact, Conclusions of Law, and Recommendations (“ALJ Report”) issued on June 21, 2024.¹ This proceeding has been unique, in terms of both substance and process. In substance, Minnesota Power proposes a significant transmission Project, to cost nearly \$1 billion, that almost triples the capacity of the existing system the Project will replace. Minnesota Power proposed this Project without talking to its large industrial customers, even though LPI will pay the vast majority of the project costs. Indeed, in terms of process, Minnesota Power’s own affiliate, American Transmission Company (“ATC”), intervened in the proceeding to propose an alternative end point, demonstrating to LPI that Minnesota Power did not thoroughly vet this project.

After ATC’s Intervention, the Minnesota Public Utilities Commission ordered these contested case proceedings, requiring the ALJ to “focus record development on the viability of ATC’s alternative, and Minnesota Power’s concerns therewith. The Commission expects that in the course of this case the parties will develop a full record addressing issues that are relevant to the Commission’s certificate of need and permit decisions.”² Accordingly, the ALJ focused the contested case on the impact of the ATC Alternative to determine the narrow issue of which endpoint should be used – an issue that assumes and predetermines the Project itself needs to be built.

LPI disagrees with this premise that the Project as proposed is needed. Minnesota Power proposes this Project at a time when it is widely accepted that the region and nation need a vast and immediate buildout of transmission projects to enable the energy transition. As the record shows, the Midwest Independent System Operator (“MISO”) is planning more than \$33 billion in transmission projects as part of its Long-Range Transmission Planning (“LRTP”) process. At the same time that billions of dollars of transmission investment are being planned, the Minnesota

¹ LPI consists of Blandin Paper Company; Boise Paper, a Packaging Corporation of America company, formerly known as Boise, Inc.; Cleveland-Cliffs Minorca Mine Inc.; Enbridge Energy, Limited Partnership; Gerdau Ameristeel US Inc.; Hibbing Taconite Company; Northern Foundry, LLC; Sappi Cloquet, LLC; USG Interiors, Inc.; United States Steel Corporation (Keetac and Minntac Mines); and United Taconite, LLC.

² Ex. PUC-701 (Order Identifying Alternative Proposal for Environmental Assessment Scope, Granting Variance, and Notice of and Order for Hearing) (eDocket No. 202311-200811-01), p. 6; *see also* p. 10 (“The Commission requests that the ALJ ... focus the contested case proceedings on the impact of ATC’s alternative”).

Legislature passed permitting reform legislation “that will shorten and streamline the energy permitting process...result[ing] in time savings of 9-12 months for permitting and building renewable energy and transmission projects.”³ The 2024 permitting legislation significantly reduces the number of transmission line projects that must obtain a certificate of need from the Commission. In other words, at a time when utilities and other transmission owners are planning a major buildout of transmission, Minnesota is relaxing its requirements for these projects. In LPI’s view, this means the Commission’s review of this Project is all the more meaningful as Minnesota embarks on a new era of transmission planning and investment and the Commission should carefully consider what projects are needed and at what cost, and when is it appropriate to require cost sharing and collaboration to avoid inefficient and unnecessary investments. The Commission has a statutory responsibility to ensure just and reasonable rates and part of that will require the Commission to make sure utilities are not overbuilding transmission assets. Here, LPI understands and supports the need to replace and modernize the Square Butte High Voltage Direct Current (“HVDC”) Modernization System at its existing capacity, but it is not necessary to expand and upgrade the System as Minnesota Power proposes. Minnesota Power operates a 1600 MW system, and yet this Project proposes to:

1. Build transmission in isolation, without regional support or cost-sharing;
2. Expand the capacity of the line by almost three-fold, from 550 MW to 1500 MW, with no demonstration of need for that expansion;
3. Will require at least an additional \$58 million in investment to operate at the expanded capacity;
4. Include optionality to expand the capacity of the line up to 3000 MW in the near future at additional, unknown, cost without no demonstration of need for that expansion;
5. Double Minnesota Power’s ratebase;
6. Transport additional wind from North Dakota that Minnesota Power has not yet secured;
7. Operate independently of the current and future MISO system, even after the buildout of LRTP Tranches 1 and 2; and

³ See Governor Walz Press Release, June 27, 2024, available at: [Governor Walz Signs Energy Permitting Reform Legislation \(mn.gov\)](https://www.governor.walz.gov/newsroom/governor-walz-signs-energy-permitting-reform-legislation) (last accessed July 1, 2024).

8. Likely connect to other HVDC projects Allete is building across the country.

The cost of the Project, estimated at nearly \$1 billion, will be borne entirely by Minnesota Power's customers, with LPI paying the vast majority of those costs. LPI does not support the Project as proposed and requests the Commission take a hard look at:

1. Whether regional transmission solutions could alleviate the need for this Project;
2. Whether the expansion to 900 MW or 1500 MW or 3000 MW is necessary;
3. Whether Minnesota Power should be required to pursue cost sharing for the regional benefits the Project touts;
4. How Allete and Minnesota Power's unregulated affiliates will benefit from the Project;
5. Minnesota Power's planned investments over the course of the next five, ten and fifteen years and whether the resulting rates will be just and reasonable; and
6. What conditions should be imposed to ensure Minnesota Power customers do not bear undue risk.

LPI submits its Exceptions to the ALJ Report below and requests the Commission impose the Conditions included in LPI's Reply Brief.

II. ANALYSIS

A. The ALJ Erred in Determining Minnesota Power Should Expand the HVDC System to Meet Future, Regional Need.

Minnesota Power admits it has a need for only for the existing 550 MW of capacity on the HVDC System.⁴ Nevertheless, Minnesota Power proposes to increase the voltage from 230 kV to 345 kV and expand the capacity of certain components of the HVDC System from 550 MW to 1500 MW. To serve the needs of its customers, all of which are in Minnesota, the Company should refurbish the System at its existing capacity. Instead, the Company has planned a phased buildout of the System to "accommodate regional bulk transfers of power." These "regional transfers" are not necessary to serve Minnesota Power's customers and its customers should not pay the significant costs of expanding the HVDC System. Minnesota Power has not proven the need to

⁴ Minnesota Power Initial Brief, p. 33.

expand the capacity or increase the voltage of the System and LPI requests the Commission reject the ALJ's Findings of Fact in this regard.

1. Increase in Capacity from 550 MW to 1500 MW

Minnesota Power has proposed to increase the capacity of certain components of the HVDC System so that the HVDC converters will be capable of transferring up to 1,500 MW upon completion of the proposed Project. In addition, certain components will be built to accommodate the Company's MISO Transmission Service Requests ("TSR"), which will add 350 MW of capacity after the Company completes an additional transmission line upgrade on the System. The Company was not transparent in developing the record on the costs of the expandability, and throughout this process it has been difficult to understand what expansion the Company is proposing and what costs are in this proceeding, and what costs will be necessary in future upgrades. It is clear, however, that some portion of the costs of expandability are included in this Project and the ALJ erred in adopting Finding of Fact 242.

Despite MISO identifying TSR costs for the 350 MW at \$314 million,⁵ Minnesota Power claims the incremental cost to build for this 350 MW is \$91 million of costs at issue in this proceeding, and an additional \$58 million in necessary upgrades for the HVDC Line that will be addressed in a future proceeding, for a total incremental cost of \$149 million.⁶ As LPI has pointed out, the relation between the TSR costs (\$314 million) and the \$91 million Minnesota Power claims is the cost to increase the capacity to 900 MW is unclear.⁷ But it is uncontroverted that the proposed Project includes at least \$91 million in costs to expand the system by 350 MW to 900 MW.⁸ LPI requests the Commission modify Finding of Fact 242 as follows:

242. Minnesota Power has incorporated expandability into its proposed configuration of the project to create optionality and flexibility for the HVDC system's capacity to be increased by 350 MW (to 900 MW) for the transmission service requests held by Minnesota Power for the benefit of its customers, with potential future modifications to the existing HVDC line, which would be increased another 600 MW (to 1500 MW) if the HVDC line is rebuilt. ~~Neither of these increases are included in this proceeding. The incorporation of these expandability~~

⁵ LPI Initial Brief, p. 8; Ex. LPI-301 (Maini Rebuttal), p. 8-9.

⁶ Minnesota Power Initial Brief, p. 34.

⁷ LPI Reply Brief, p. 8-9.

⁸ See also, Minnesota Power Initial Brief, p. 2, 36-37 (stating \$700 million of the \$800 million Project cost estimate is to accommodate existing and planned TSR capacity).

~~and flexibility features into Minnesota Power's proposed configuration accounts for approximately \$100 million of the \$800 million project cost. (citations omitted.)~~

The Commission should modify this Finding because it is inaccurate – Minnesota Power admits costs of the 350 MW capacity expansion are included in the Project cost estimate. As LPI has continually requested in this matter, and further discusses below, the Commission should not allow the Company to recover the costs of expandability in this proceeding until MISO has incorporated the use of the HVDC System into its long-range planning and the Company can prove the expansion has financially benefitted its customers.

2. Increase in Voltage from 230 kV to 345 kV

Minnesota Power proposes to interconnect the new HVDC converter stations at 345 kV and then step down the voltage to 230 kV to connect to the “backbone” of its 230 kV system. The Company evaluated the option to connect the new HVDC converters directly into the 230 kV system, which would be less costly than utilizing the 345 kV converters, but decided against this option stating the region will eventually need a 345 kV backbone network.⁹ The Commission should reject Minnesota Power’s proposal to increase the voltage of the HVDC System. As the Department and LPI argued, “MISO does not appear to have any present plans to expand the local 345 kV system in northeastern Minnesota.”¹⁰ Therefore, as the Department notes, the ability to accommodate future expansion is not a high priority for this project.¹¹

As noted in LPI’s Initial Brief, in early March 2024, MISO released its initial draft portfolio for LRTP Tranche 2, which does not include the Proposed Project.¹² Minnesota Power has not demonstrated the need to increase the voltage of the HVDC System. Its system is 230 kV and MISO has not incorporated 345 kV systems in its long-range planning and proposed \$33 billion transmission buildout. Minnesota Power may want to upgrade the system to accommodate 345 kV transmission for other reasons, but 345 kV is not necessary for it to serve its customers. The Commission should reject the ALJ’s Finding of Fact 195 and amend Findings of Fact 192-205 to be consistent with LPI’s Proposed Findings of Fact 13 and 14.

⁹ See Ex. MP-104, p. 39 (Combined Application); Ex. MP-121, p. 6 (Winter Direct).

¹⁰ Department Initial Brief, p. 17; LPI Reply Brief, p. 6.

¹¹ Department Initial Brief, p. 17.

¹² Minnesota Power Initial Brief, p. 33.

~~195. While this alternative would have a lower cost in the near term, the long-term cost would likely be significantly higher than developing an initial interconnection at 345 kV. The northeastern Minnesota transmission system is built around a 230 kV backbone infrastructure. However, as the regional transmission system continues to develop to support the clean energy transition, the region will eventually need a 345 kV backbone network. The HVDC system has long-term significance for the regional transmission system, enabling efficient and flexible long-distance transfer of high-value and zero-fuel-cost renewable energy resources in North Dakota to customers throughout the MISO area. As the use and significance of this existing HVDC system evolves over the life of the proposed HVDC converter stations, it will become increasingly important for the HVDC system to be directly interconnected to the regional 345 kV network, rather than the underlying local 230 kV network. However, to move the point of interconnection from the 230 kV system to the 345 kV system later would require an expensive replacement of the converter transformers to change the winding voltage on the AC-system side. Because the HVDC converter transformers account for approximately 20 percent of the overall cost of the HVDC converter station itself, there would be a significant sunk cost at the time the transition from 230 kV to 345 kV is made in the future, when conditions warrant this interconnection. Therefore, alternative AC transmission voltages are not a more reasonable or prudent alternative to the HVDC modernization project. (citations omitted)~~

LPI 13. The Proposed Project scope and expansion is cast in further doubt because MISO does not appear to have any present plans to expand the local 345 kV system in northeastern Minnesota. Therefore, as the Department notes, the ability to accommodate future expansion is not a high priority for this project. In early March 2024, MISO released its initial draft portfolio for LRTP Tranche 2, which does not include the Proposed Project. (citations omitted)

LPI 14. The Commission could consider delaying its decision in this matter until the Company has explained the ramifications of MISO LRTP on the viability of this Project.

If the Commission approves the Proposed Project, it should disallow the incremental cost of the converters because the Company has not proven it is necessary to increase the capability to 345 kV.

B. The Commission Should Disallow Recovery of the Costs Necessary to Expand and Upgrade the HVDC System.

LPI continues to request the Commission disallow the portion of the Project costs that are necessary to upgrade and expand the HVDC System. Minnesota Power currently uses the HVDC System to deliver 600 MW of energy and it is undisputed that it has no need to expand the System capacity. Because there is no need, Minnesota Power's customers should not bear the costs

incurred to upgrade the HVDC System. Moreover, if the excess capacity does become useful, it will, at least in part, be used to benefit the MISO region, and not Minnesota Power customers exclusively. Minnesota Power has recognized that cost sharing is necessary for this Project, and yet inexplicably it requests its customers to bear the entirety of the costs. LPI therefore requests the Commission modify Finding of Fact 246 as follows:

246. Further, if MISO identifies that an increase in capacity of the HVDC system is above what is needed for Minnesota Power customers, MISO could determine that costs necessary to effectuate those increases could be subject to cost allocation. Therefore, while the HVDC modernization project, itself, is not eligible for cost allocation through MISO, the Commission will disallow the costs of the capacity increase. Minnesota Power shall continue to explore opportunities for cost allocation associated with the potential future expansion. (citations omitted)

It is reasonable for Minnesota Power customer to pay for the refurbishment of the HVDC System at its existing capability and capacity, but there is no reason to upgrade and expand the System to serve its customers. Therefore, the Company should bear the costs and risks associated with any expansion or upgrade of the System.

C. The Commission Should Condition Its Approval of the Proposed Project.

LPI has no qualms with the Project other than the proposed scope and cost recovery. It is possible that the HVDC System, once upgraded and expanded, will be utilized for the regional bulk transfers of power that Minnesota Power envisions and it could be a valuable transmission project that supports the energy transition, as Minnesota Power claims. But it is undisputed that there is no immediate need for expansion of the System and Minnesota Power's customers should not pay for that expansion, which, if used, will be used for the benefit of the region and MISO system. The expansion of the System is designed to accommodate MISO and regional needs, and the Company needs to pursue cost allocation for that expansion so that those who benefit pay for it. Therefore, LPI requests the Commission adopt its Recommendations proposed in its Reply Brief, as follows:

1. Minnesota Power has not met its burden to prove the expansion of the line is necessary and at most the line should be refurbished at its existing capacity.
2. The Commission may want to consider whether to delay its decision in this matter until Minnesota Power can explain how its Project will fit into MISO's LRTP

planning, and other regulatory frameworks that will develop to guide the national transmission buildout.

3. The Commission should consider whether the Proposed Project is better suited to a merchant transmission line, instead of being a Minnesota Power-owned investment.
4. In the alternative, if the Commission chooses to move forward with this Project, the Commission should permit only a like-size replacement at greatly reduced costs, instead of the HVDC System expansion Minnesota Power proposes.
5. Minnesota Power has not demonstrated the need to expand the capacity of the HVDC System, especially in light of the near-term buildout of transmission within MISO that could supplant the use of this HVDC System in its entirety.
6. At most, the Commission should limit its approval to replacement of the aging components and if Minnesota Power chooses to move forward with the expansion, it should do so at its risk and it should not recover Project costs until it can demonstrate its buildout has led to financial benefit for Minnesota Power customers. The Commission should condition any approval for this Project so that Minnesota Power does not recover the incremental costs, in a range of \$149 to \$372 million, until it can demonstrate customers have financially benefited from them.
7. Because the Company has plans for an extraordinary amount of investment in the near term, the Commission must evaluate the overall project cost and its impact on rates in light of the tripling of Minnesota Power's rate base. The Commission must consider slowing Minnesota Power's investment pace so rates remain just and reasonable.
8. The Commission should impose a cost cap of \$660 million or \$800 million.
9. Any Commission approval should include conditions to protect customers from undue risk, and also make sure that all benefits that result from the Proposed Project flow to customers and not Minnesota Power's affiliates.

III. CONCLUSION

LPI requests the Commission reject and modify the ALJ's Findings of Fact as set forth above to conform to the determination that Minnesota Power should not recover costs of the proposed expansion of the HVDC System.

Dated: July 1, 2024

Respectfully submitted,

STOEL RIVES LLP

/s/ Amber S. Lee

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CERTIFICATE OF SERVICE

I, Carmel Laney, hereby certify that I have this day served a true and correct copy of the following document(s) to all persons at the addresses indicated below or on the attached list by electronic filing, electronic mail, courier, interoffice mail or by depositing the same enveloped with postage paid in the United States Mail at Minneapolis, Minnesota.

EXCEPTIONS TO THE FINDINGS OF FACT, CONCLUSIONS OF LAW, AND RECOMMENDATIONS OF THE ADMINISTRATIVE LAW JUDGE

SUBMITTED ON BEHALF OF THE LARGE POWER INTERVENORS (“LPI”)

In the Matter of the Application of Minnesota
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Dated this 1st day of July, 2024

/s/ Carmel Laney
Carmel Laney

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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	Electronic Service	No	OFF_SL_22-607_Official CC Service List
Stephan	Roos	stephan.roos@state.mn.us	MN Department of Agriculture	625 Robert St N Saint Paul, MN 55155-2538	Electronic Service	No	OFF_SL_22-607_Official CC Service List
Nathaniel	Runke	nrunke@local49.org	International Union of Operating Engineers Local 49	611 28th St. NW Rochester, MN 55901	Electronic Service	No	OFF_SL_22-607_Official CC Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Elizabeth	Schmiesing	eschmiesing@winthrop.com	Winthrop & Weinstine, P.A.	225 South Sixth Street Suite 3500 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_22-607_Official CC Service List
Christine	Schwartz	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_22-607_Official CC Service List
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th PI E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_22-607_Official CC Service List
Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates	7400 Lyndale Ave S Ste 190 Richfield, MN 55423	Electronic Service	Yes	OFF_SL_22-607_Official CC Service List
Tom	Slukich	tom@nationalconductor.com	National Conductor Constructors	18119 Hwy 371 North Braiderd, MN 56401	Electronic Service	No	OFF_SL_22-607_Official CC Service List
Adam	Sokolski	adam.sokolski@edf-re.com	EDF Renewable Energy	10 Second Street NE Ste 400 Minneapolis, MN 55410	Electronic Service	No	OFF_SL_22-607_Official CC Service List
Mark	Strohfus	mstrohfus@greenergy.com	Great River Energy	12300 Elm Creek Boulevard Maple Grove, MN 553694718	Electronic Service	No	OFF_SL_22-607_Official CC Service List
Carl	Strohm	cjsmg@sbcglobal.net	SBC Global	105 East Edgewood Ave Indianapolis, IN 46227	Electronic Service	No	OFF_SL_22-607_Official CC Service List
Tom	Swafford	tswafford@umsi.us	Utility Mapping Services, Inc	3947 E Calvary Rd Suite 103 Duluth, MN 55803	Electronic Service	No	OFF_SL_22-607_Official CC Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Eric	Swanson	eswanson@winthrop.com	Winthrop & Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_22-607_Official CC Service List
Todd	Tadych	ttadych@atcllc.com	American Transmission Company LLC	5303 Fen Oak Dr Madison, WI 53718	Electronic Service	No	OFF_SL_22-607_Official CC Service List
Jayne	Trusty	execdir@swrdc.org	SWRDC	2401 Broadway Ave #1 Slayton, MN 56172	Electronic Service	No	OFF_SL_22-607_Official CC Service List
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	Electronic Service	No	OFF_SL_22-607_Official CC Service List
Kodi	Verhalen	kverhalen@taftlaw.com	Taft Stettinius & Hollister LLP	80 S 8th St Ste 2200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_22-607_Official CC Service List
Cynthia	Warzecha	cynthia.warzecha@state.mn.us	Minnesota Department of Natural Resources	500 Lafayette Road Box 25 St. Paul, MN 55155-4040	Electronic Service	No	OFF_SL_22-607_Official CC Service List
Elizabeth	Wefel	eawefel@flaherty-hood.com	Flaherty & Hood, P.A.	525 Park St Ste 470 Saint Paul, MN 55103	Electronic Service	No	OFF_SL_22-607_Official CC Service List
Alan	Whipple	sa.property@state.mn.us	Minnesota Department Of Revenue	Property Tax Division 600 N. Robert Street St. Paul, MN 551463340	Electronic Service	No	OFF_SL_22-607_Official CC Service List
Deanna	White	mncwa@cleanwater.org	Clean Water Action & Water Fund of MN	330 S 2nd Ave Ste 420 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_22-607_Official CC Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Rachel	Wiedewitsch	wiedewitsch@fresh-energy.org	Fresh Energy	408 St Peter St #350 St. Paul, MN 55102	Electronic Service	No	OFF_SL_22-607_Official CC Service List
Jonathan	Wolfgram	Jonathan.Wolfgram@state.mn.us	Office of Pipeline Safety	445 Minnesota St Ste 147 Woodbury, MN 55125	Electronic Service	No	OFF_SL_22-607_Official CC Service List
David	Zoppo	DZoppo@perkinscoie.com	Perkins Coie LLP	33 E Main Street Suite 201 Madison, WI 53703	Electronic Service	No	OFF_SL_22-607_Official CC Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Christopher J.	Cerny	ccerny@winthrop.com	Winthrop & Weinstine, P.A.	225 South Sixth Street Suite 3500 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_22-611_Official CC Service List
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_22-611_Official CC Service List
Adam	Duininck	aduininck@ncsrcc.org	North Central States Regional Council of Carpenters	700 Olive Street St. Paul, MN 55130	Electronic Service	No	OFF_SL_22-611_Official CC Service List
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 551012198	Electronic Service	No	OFF_SL_22-611_Official CC Service List
Lucas	Franco	lfranco@liunagroc.com	LIUNA	81 Little Canada Rd E Little Canada, MN 55117	Electronic Service	No	OFF_SL_22-611_Official CC Service List
Amber	Lee	amber.lee@stoel.com	Stoel Rives LLP	33 S. 6th Street Suite 4200 Minneapolis, MN 55402	Electronic Service	Yes	OFF_SL_22-611_Official CC Service List
Dan	McCourtney	dmccourtney@mnpower.com	Minnesota Power	30 West Superior St Duluth, MN 55802	Electronic Service	No	OFF_SL_22-611_Official CC Service List
Greg	Merz	greg.merz@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	No	OFF_SL_22-611_Official CC Service List
David	Moeller	dmoeller@allte.com	Minnesota Power	30 W Superior St Duluth, MN 558022093	Electronic Service	No	OFF_SL_22-611_Official CC Service List
Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP	33 South Sixth St Ste 4200 Minneapolis, MN 55402	Electronic Service	Yes	OFF_SL_22-611_Official CC Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
James	Mortenson	james.mortenson@state.mn.us	Office of Administrative Hearings	PO BOX 64620 St. Paul, MN 55164-0620	Electronic Service	Yes	OFF_SL_22-611_Official CC Service List
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_22-611_Official CC Service List
Nathaniel	Runke	nrunke@local49.org	International Union of Operating Engineers Local 49	611 28th St. NW Rochester, MN 55901	Electronic Service	No	OFF_SL_22-611_Official CC Service List
Elizabeth	Schmiesing	eschmiesing@winthrop.com	Winthrop & Weinstine, P.A.	225 South Sixth Street Suite 3500 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_22-611_Official CC Service List
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th Pl E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_22-611_Official CC Service List
Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates	7400 Lyndale Ave S Ste 190 Richfield, MN 55423	Electronic Service	Yes	OFF_SL_22-611_Official CC Service List
Eric	Swanson	eswanson@winthrop.com	Winthrop & Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_22-611_Official CC Service List
Kodi	Verhalen	kverhalen@taftlaw.com	Taft Stettinius & Hollister LLP	80 S 8th St Ste 2200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_22-611_Official CC Service List
Cynthia	Warzecha	cynthia.warzecha@state.mn.us	Minnesota Department of Natural Resources	500 Lafayette Road Box 25 St. Paul, MN 55155-4040	Electronic Service	No	OFF_SL_22-611_Official CC Service List
David	Zoppo	DZoppo@perkinscoie.com	Perkins Coie LLP	33 E Main Street Suite 201 Madison, WI 53703	Electronic Service	No	OFF_SL_22-611_Official CC Service List