COMMERCE DEPARTMENT

April 24, 2026

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

RE: Reply Comments of the Minnesota Department of Commerce
Docket No. E015/M-25-140

Dear Ms. Bergman,

Attached are the reply comments of the Minnesota Department of Commerce (Department) in the following matter:

In the Matter of Minnesota Power's 2025 Integrated Distribution Plan.

Minnesota Power's (MP) Integrated Distribution Plan (IDP) was filed on November 3, 2025. MP's Transportation Electrification Plan (TEP) was filed concurrently.

The Department recommends the Commission accept Minnesota Power's IDP and TEP with modifications and is available to answer any questions the Minnesota Public Utilities Commission may have.

Sincerely,

/s/ Dr. SYDNIE LIEB
Assistant Commissioner of Regulatory Analysis

AZ/RW/BP/DD/KB/ad
Attachment

Contents

Acronyms and Abbreviations

AMI	Advanced Metering Infrastructure
BESS	Battery Energy Storage System
CBA/BCA	Cost-Benefit Analysis/Benefit Cost Analysis
CVR	Conservation Voltage Reduction
DER	Distributed Energy Resource
DERMS	Distributed Energy Resources Management System
DOE	US Department of Energy
DR	Demand Response
DRMS	Demand Response Management Systems
ECO	Energy Conservation & Optimization
EV	Electric Vehicle
FERC	Federal Energy Regulatory Commission
FLISR	Fault Location Isolation and Service Restoration
FPI	Fire Potential Index
Grid Mod	Grid Modernization
IDP	Integrated Distribution Plan
IR	Information Request
IRP	Integrated Resource Plan
kV	Kilo Volt
kW	Kilowatt
kWh	Kilowatt-Hour
MISO	Midcontinent Independent System Operator
MP	Minnesota Power
MDU	Multi-dwelling unit
MW	Megawatt
NWA	Non-Wire Alternative
O&M	Operations and Maintenance
PUC	Public Utilities Commission
PV	Photovoltaic
SAIDI	System Average Interruption Duration Index
SRSQ	Safety, Reliability, and Service Quality
TEP	Transportation Electrification Plan
VVO	Volt-Var Optimization
Xcel	Xcel Energy

Before the Minnesota Public Utilities Commission

Comments of the Minnesota Department of Commerce

Docket No. E015/M-25-140

I. INTRODUCTION

Every two years, Minnesota Power (MP or the Company) submits an Integrated Distribution Plan (IDP), which began following the Minnesota Public Utilities Commission's (Commission) February 20, 2019 *Order Approving Integrated Distribution Planning Filing Requirements*.[1] The primary purpose of the IDPs is to ensure compliance with the Commission's filing requirements; the Commission approves each IDP after it determines that the Company has met those requirements.

The Department seeks to understand utility decision-making processes in order to cross-pollinate, when practicable, best practices among the rate-regulated utilities. At this stage, the Department is interested in the costs and benefits of different planning strategies.

It is the Department's goal to foster collaboration with each of the rate regulated utilities, rather than to make recommendations that utilities oppose. However, with key affordability concerns identified across the IDPs, the Department intends to advocate for the analysis of potentially cost saving strategies when practicable.

The Department commends MP for its willingness to collaborate with the Department in its explorative analysis of MP's distribution planning processes. MP's engagement with the Department offers a roadmap for future IDP collaboration.

[1] *In the Matter of Distribution System Planning for Minnesota Power, Order Adopting Integrated Distribution Plan Filing Requirements*, February 20, 2019, Docket No. E-015/CI-18-254, (eDockets) 20192-150449-03, (hereinafter "February 20, 2019 Order").

II. PROCEDURAL BACKGROUND

December 8, 2022	The Commission issued its Order in Docket Nos. E002/M-21-694 and E999/CI-17-879.[2] The Order approved combining the filing requirements of electric utility IDPs and TEPs.
May 2023	The Minnesota Legislature established requirements for utility TEPs in 2023 Minn. Laws. ch. 60, art. 12, sec. 12, codified at Minn. Stat. § 216B.1615 – Electric Vehicle Deployment Program. Minn. Stat. § 216B.1615 requires electric utilities to file TEPs, established certain content requirements, granted the Commission authority to approve, modify or reject TEPs, and established evaluation criteria.[3]
September 16, 2024	The Commission issued its Order in Docket No. E015/M-23-258, approving MP's 2023 IDP and modifying reporting requirements.[4]
November 3, 2025	MP files its 2025 TEP and IDP.[5]
November 13, 2025	The Commission issues its Notice of Comment Period.[6]
March 13, 2026	The Department files initials comments.[7]
April 3, 2026	Minnesota Power files reply comments.[8]

[2] *In the Matter of a Commission Inquiry into Electric Vehicle Charging and Infrastructure; In the Matter of Xcel Energy's 2021 Integrated Distribution System Plan; In the Matter of Minnesota Power's 2021 Integrated Distribution System Plan; In the Matter of Distribution System Planning for Otter Tail Power Company, Order,* December 8, 2022, Docket Nos. E-99/CI-17-879, E-002/M-21-694, E-015/M-21-390, E-017/M-21-612 (eDockets) 202212-191192-01.
[3] Minn. Stat. § 216B.1615 (2023).
[4] *In the Matter of Minnesota Power's 2023 Integrated Distribution Plan, Order Accepting 2023 Integrated Distribution Plan and Transportation Electrification Plan, and Modifying Reporting Requirements*, September 16, 2024, Docket No. E015/M-23-258, (eDockets) 20249-210224-01 (hereinafter "2023 IDP Order").
[5] *In the Matter of Minnesota Power's 2025 Integrated Distribution Plan*, Minnesota Power, November 3, 2025, Docket No. E015/M-25-140, (eDockets) 202511-224624-01 (hereinafter "2025 IDP").
[6] Notice.
[7] Department, Comments, March 13, 2026, Docket No. E015/M-25-140, (eDockets) 20263-229266-01 (hereinafter "Department Initial Comments").
[8] Minnesota Power, Reply Comments, April 3, 2026, Docket No. E015/M-25-140, (eDockets) 20264-230011-01 (hereinafter "MP Reply Comments").

Topic(s) open for comment:

2025 Minnesota Power Integrated Distribution System Plan

1. Should the Commission accept or reject Minnesota Power's IDP?
2. Did Minnesota Power adequately address the Commission's IDP filing requirements and prior Orders, as outlined in Attachment A to this notice?
3. Feedback, comments, and recommendations on the following areas of Minnesota Power's IDP:
    a. Non-wires alternatives analysis
    b. Planned grid modernization initiatives
    c. Forecasted distribution budget
    d. Distributed Energy Resource (DER) scenarios and forecasts
    e. Pilot Projects
4. Other areas of Minnesota Power's IDP not listed above, along with any other issues or concerns related to this matter.

2025 Minnesota Power Transportation Electrification Plan (TEP)

5. Should the Commission approve, modify, or reject Minnesota Power's TEP?
6. Did Minnesota Power adequately address the Commission's TEP filing requirements and prior Orders, as outlined in Attachment A to this notice?
7. Are there gaps in Minnesota Power's transportation electrification programs the Commission should address to ensure equitable customer outcomes
8. Are there other issues or concerns related to this matter?

III. DEPARTMENT ANALYSIS

A. IDP SCHEDULE

The current biennial IDP schedule creates a significant barrier to participation for the Department and other stakeholder groups; the volume of the IDPs creates a highly concentrated workload for parties, which makes it difficult to manage staff time and interrelated or competing deadlines. The Department is concerned that the biennial IDP schedule especially limits participation in the IDPs by other parties. To foster enhanced participation in the IDPs, the Department recommends a revised annual IDP schedule to allow commenters more time to participate in the IDP process.

The Department recommends the Commission order either A or B:

A. Xcel file its IDP, TEP, and IDP-Related Ad Hoc filings in odd-numbered years. MP, DEA, and OTP file their IDP and TEP in even-numbered years, with the next filing due in 2028.
B. All IDPs are filed in odd-numbered years. All TEPs and IDP-Related Ad Hoc Filings are filed in even-numbered years, with the next filing due in 2028.

The Department's preference is A. However, B., or any modifications of A. or B. would be acceptable, so long as the workload is spread annually rather than biennially. The Department cross files this recommendation in each of the rate-regulated utilities' IDPs.

A.1. Final Recommendations

The Department makes one new recommendation:

The Department recommends the Commission order either A or B:

A. Xcel file its IDP, TEP, and IDP-Related Ad Hoc filings in odd-numbered years. MP, DEA, and OTP file their IDP and TEP in even-numbered years, with the next filing due in 2028.
B. All IDPs are filed in odd-numbered years. All TEPs and IDP-Related Ad Hoc Filings are filed in even-numbered years, with the next filing due in 2028.

B. CAPACITY

In its initial comments, the Department made the following requests for information regarding overcapacity at MP's substations. The Department stated:

> The Department requests MP explain in reply comments why the Blanchard and 15th Ave West Substations do not appear to have capacity mitigations in MP's planned budget.
>
> The Department requests MP explain in reply comments whether it considers the overloads at the Little Falls and Verndale substations to be significant safety or reliability risks, and if so, how MP plans to mitigate these risks.[9]

MP replies to the Department's requests as follows:

> The Company manages loading and associated safety and reliability risks at Blanchard, 15th Avenue West, Little Falls, and Verndale through a combination of continuous SCADA monitoring, established loading limits, and defined operating procedures to ensure these risks are mitigated. Additionally, several of these substations have been identified for investments and are outlined in the Company's 2025 IDP. The Company would also note that for the Blanchard, 15th Avenue West, Little Falls, and Verndale substations, historical peak load exceeds the substations' firm capacity, but not total transformer capacity. The Company defines firm capacity as the capacity available following the loss of the largest single transformer at a given substation. When assessing substation capacity and planning needs, the Company relies on firm capacity where applicable. The Company conducts annual reviews of loading across all substations and re-prioritizes modernization projects based on a range of factors, including asset age and condition, reliability, capacity considerations, and constructability constraints such as outage coordination, equipment lead times, and site limitations.

[9] Department Initial Comments at 10.

> The Blanchard Substation has approximately 28.3 MW of distributed energy resources ("DER") interconnected to its feeders, as well as the Company–owned hydro generation interconnected to the Blanchard distribution bus. This interconnected generation reduces loading on the Blanchard transformers such that peak loading remains below the substation's firm capacity rating. The substation peak loading values presented in Appendix F of the Company's 2025 Integrated Distribution Plan exclude utility-scale solar and hydro generation. The Company has a project identified in the five-to-ten-year planning horizon to replace aging assets at the Blanchard Substation. However, projects in this timeframe are subject to change as system needs and priorities evolve.
>
> There is no project currently planned to increase the firm capacity of the 15th Avenue West Substation. Instead, as listed in the Company's 2025 IDP, the Company has identified the Duluth 34 kV Expansion Project, which will increase the overall load-serving capability of the Duluth 34 kV network and shift load away from the 15th Avenue West transformers, where current peak loading exceeds firm capacity.
>
> With respect to the Little Falls and Verndale Substations, exceeding firm capacity presents a reliability risk during peak conditions only in the event of the loss of the largest transformer, at which point the remaining transformer would be insufficient to serve station load. In such an event, the Company would need to transfer load to adjacent feeder ties that have been identified through contingency analysis as having available capacity. Additionally, the timing of the Little Falls and Verndale Substation modernization projects reflects the relative prioritization within the Company's broader substation modernization portfolio which is also identified in the Company's 2025 IDP.[10]

MP's response is helpful to clarify how the Company plans to address high-level capacity needs identified by the Department. The Department identified four substations that appear to have capacity risk concerns, and MP explains how the Company plans to manage these risks for each of the four substations. Specifically, the perceived overload at the Blanchard substation does not account for 28.3 MW of interconnected distributed energy resources (DER) as the DER capacity was removed from MP's peak load data that the Department used to identify the constraint; the DER connected to the Blanchard substation feeders would mitigate the capacity constraint. The Department notes that this discussion is essentially an informal planned net load (PNL) adjustment to MP's actual capacity, but it does contain hydropower, which is firm capacity and is not easily recreated in other contexts. MP explains that the Duluth 34 kV expansion project will mitigate the 15th Ave West overcapacity by transferring load to a new substation. Finally, MP explains that it mitigates N-1 substation transformer capacity risks by using contingency load transfers to adjacent feeders, which eliminates the need for N-

[10] MP Reply Comments at 3-5.

1 capacity upgrades. The Department notes that DEA states it performs similar mitigations instead of making capacity upgrades whenever practicable.[11]

At this stage, the Department seeks to assess MP's tolerance for capacity overload risks to compare to practices by other Minnesota utilities. Based on this discussion, MP is willing to experience limited overload risks, particularly at the 15th Ave West substation, but plans mitigations for all of its substation capacity overloads.

B.1. Final Recommendations

The Department has no recommendations in this section.

C. SYSTEM EXPANSION OR UPGRADES FOR RELIABILITY AND POWER QUALITY

The Department responds to the following notice topic:

Are there other issues or concerns related to this matter?

C.1. Value of Reliability Proceeding

After analyzing all of the rate-regulated utilities' IDPs, the Department finds a need for engaged discussion for all rate-regulated utilities to discuss the value of reliability. Three out of the four rate-regulated utilities do not quantify the value of reliability, and therefore do not know whether their reliability projects are cost effective. The Department finds value in engagement with all rate-regulated utilities on the value of reliability and the appropriate quantification of reliability improvements. While a uniform value is not strictly necessary, it is important to apply measurement and valuation concepts equally across utilities, when practicable. Questions remain regarding the appropriate cost of unserved energy, potential cost caps for reliability benefits, forecasting reliability benefits, appropriate use cases for the value of reliability, and the appropriate valuation of reliability by customer class.

The Department proposes this discussion in the IDP dockets, but as ad-hoc discussions. The Department envisions the following recommendation as a new comment period (initial and reply periods as needed) noticed in each of the IDPs after the Order in the IDPs is filed, to be completed before the next IDP is filed. Each utility would respond to the notice topics in its individual IDP docket. The Department cross files the following recommendation in the reply comments for each rate-regulated utility's IDP:

> **The Department recommends the Commission delegate authority to the Executive Secretary to issue a Notice of Comment Period in each IDP docket to discuss the appropriate value of reliability. The Department recommends the notice topics address:**

[11] *In the Matter of Dakota Electric Association's 2025 Integrated Distribution Plan*, Department, Comments, March 24, 2026, Docket No. E111/M-25-139, (eDockets) 20263-229585-01, at 12 (hereinafter "Department Initial Comments on DEA's 2025 IDP").

A. The valuation of the cost of unserved energy;
B. The use of price caps for the cost of unserved energy;
C. Forecasting methodologies for reliability benefits;
D. Appropriate uses cases for the value of reliability; and
E. The potential to employ different values of reliability by customer class.

C.2. Reporting and Quantification

In its initial comments, the Department recommended that the Company develop clearer reporting metrics for its reliability projects and provide a more transparent methodology for distribution system segment selection:

> The Department recommends the Commission require the Company to develop clear reporting metrics for its reliability projects (e.g., miles converted, segments addressed) and provide a clear methodology for selecting segments in their distribution system.[12]

In its reply comments, the Company responded:

> The Company currently utilizes a holistic framework for selecting distribution segments that evaluates asset condition, performance metrics such as system average interruption duration index ("SAIDI") and system average interruption frequency index ("SAIFI"), and evolving market demographics, in addition to comparing any proposed investment against a no-action baseline. In the future, the Company will add additional inputs to the framework such as wildfire risk. The Company has also engaged external consultants to assess individual values of individual grid mod programs such as FLISR and strategic undergrounding and is committed to developing the clearer reporting metrics requested by the Department to enhance grid visibility.[13]

The Department appreciates the Company's thoughtful response and its continued efforts to strengthen planning around reliability investments. The Department also recognizes MP's willingness to refine its evaluation framework, incorporate additional factors, and engage external expertise to support its grid modernization work. These efforts are constructive and demonstrate meaningful progress. However, the Department continues to request more transparent, standardized reporting metrics for reliability projects, including clear measures such as miles converted, segments addressed, and the basis for segment selection and maintains its initial recommendation. More consistent and accessible reporting will better enable the Commission and interested stakeholders to evaluate project outcomes, understand investment priorities, and assess whether reliability expenditures are being directed to the areas of greatest need.

[12] Department Initial Comments at 14.
[13] MP Reply Comments at 11.

The Department also recommended that the Commission require the Company to quantify the value of major reliability and resiliency investments:

> The Department recommends the Commission require MP to quantify the value of major reliability and resiliency investments, such as strategic undergrounding, using a recognized customer interruption cost approach (e.g, an Interruption Cost Estimate [ICE] calculator methodology) and to apply that value consistently in cost-benefit comparisons across alternatives.
>
> […]
>
> The Department recommends that strategic undergrounding be evaluated alongside other reliability tools that can materially reduce outage minutes on targeted feeders.[14]

The Company responded:

> While the Company agrees that quantifying the value of reliability and resiliency is essential, the Company proposes the Commission consider phased implementation of the ICE calculator or similar tools rather than an immediate mandate. Because the Company serves a unique blend of large industrial customers with far higher interruption costs and dispersed rural populations whose interruption costs also differ from national survey data, a generic ICE-based approach could introduce significant methodological bias and skew cost-benefit analyses to favor underinvestment. To mitigate these risks, the Company proposes a modification of the Department's recommendation to allow the Company to work with the Department and other interested stakeholders to evaluate options for quantification tools.
>
> Finally, the Company agrees with the evaluation of strategic undergrounding alongside other reliability tools and views targeted undergrounding as a vital component of grid modernization, particularly for feeders where traditional vegetation management or other preventative measures cannot sufficiently mitigate routine and more novel risks, including wildfires, or reduce outage minutes.[15]

The Department agrees that a phased approach to implementation is reasonable given the complexity of developing ICE methodology that appropriately reflects the characteristics of the MP's service territory. The Department recognizes that additional stakeholder discussion and methodological refinement may be necessary to ensure that any quantification tool is applied in a fair, accurate, and

[14] Department Initial Comments at 14-15.
[15] MP Reply Comments at 11.

transparent manner. Therefore, the Department modifies its recommendation and supports phased implementation of an ICE calculator methodology or a similar recognized approach, developed in consultation with the Department and other stakeholders.

The Department recommends the Commission require MP to ~~quantify~~ implement, on a phased basis, a process to quantify the value of major reliability and resiliency investments, such as strategic undergrounding, using a recognized customer interruption cost approach (e.g, an Interruption Cost Estimate [ICE] calculator methodology) or a similar recognized approach developed in consultation with the Department and other stakeholders, and to apply that value consistently in cost-benefit comparisons across alternatives.

C.3. Final Recommendations

The Department makes the following new/modified recommendation:

- The Department recommends the Commission require MP to implement, on a phased basis, a process to quantify the value of major reliability and resiliency investments, such as strategic undergrounding, using a recognized customer interruption cost approach (e.g, an Interruption Cost Estimate [ICE] calculator methodology) or a similar recognized approach developed in consultation with the Department and other stakeholder, and to apply that value consistently in cost-benefit comparisons across alternatives.

The Department maintains the following recommendations:

- The Department recommends the Commission require the Company to develop clear reporting metrics for its reliability projects (e.g., miles converted, segments addressed) and provide a clear methodology for selecting segments in their distribution system.
- The Department recommends that strategic undergrounding be evaluated alongside other reliability tools that can materially reduce outage minutes on targeted feeders.

D. AGE RELATED REPLACEMENTS AND ASSET RENEWAL

The Department responds to the following notice topic:

Are there other issues or concerns related to this matter?

D.1. Substation Transformer Capacity Utilization

In its initial comments, the Department requested that MP explain how the Company plans to deal with oversized system assets. The Department stated:

> As Figure 5 shows, the majority of MP's substations have significant capacity overhead, with a median substation utilization of 37.5 percent. Figure 7 shows MP's likely distribution sales forecast from its 2025 Annual Forecast Report. Distribution sales are expected to grow at a 15-year growth rate of 8.2 percent, which annualizes to approximately 0.53% / yr. The growth rate at 30 and 50 years is 17.0 and 30.0 percent, respectively. At the median substation utilization of 37.5 percent, the 15-year, 30-year, and 50-year substation utilization would be 40.6, 43.9, and 48.8 percent, respectively. MP's median substation utilization could easily double without a significant risk of overload on a 30-year horizon, which indicates that MP's substation infrastructure is significantly oversized.
>
> […]
>
> It does not appear that MP oversizes its substation transformers based on forecasted loads. While equipment ratings could explain some of the excess capacity, the Department does not expect that the next equipment size can justify why MP's substations typically use less than half of their rated capacity. Pending MP's response, the Department's initial conclusion is that the majority of MP's substations are oversized.
>
> The time to right-size MP's equipment is during asset replacement. Oversizing equipment protects against future upgrades, but it also increases costs in the near term because larger assets are more expensive. Given that the majority of MP's system is not capacity constrained, MP has an opportunity to right-size its old equipment to avoid paying for oversized system assets that may never be fully utilized. Right sizing equipment could spare MP's ratepayers from significant impacts that are expected from MP's Age Related Replacements and Asset Renewal budget.
>
> The Department requests MP explain in reply comments how the Company plans to address oversized system assets in its planned Age-Related Replacements and Asset Renewal projects *[internal citations omitted]*.[16]

MP provides the following response:

> While the Department characterized Minnesota Power's system assets as "oversized," the Company sizes its system assets based on the reliability and operational needs of the system. Systems are planned to ensure that reliability can be maximized at the least possible capital cost by leveraging standard sizing and construction methods. In internal power flow studies, the Company will identify max loading on distribution assets in baseline

[16] Department Initial Comments at 17-19.

> analysis (N-0) with future load growth and contingency (N-1) analysis. The baseline analysis will identify if there are any existing or near-term thermal overloads when the distribution system is in its normal configuration. Contingency analyses will evaluate the distribution system assets to provide backup capability with an adjacent external feeder. The assets will be sized to create full capacity ties that would allow the Company to back up the load on any feeder or substation during any planned or unplanned outages during the year. For operational efficiency, the Company uses standard sizes across all our system assets when applicable. For example, the Company has two standard T-D transformer sizes to select from when planning substation modernization or targeted asset renewal projects. Using standard sizes across our system allows for common equipment specification and engineering designs. Standard equipment sizes also allow for a common spare strategy across our system which allows for a faster response replacing failed assets in addition to cost savings by minimizing the carry-costs of additional inventory.[17]

While MP's response helps to clarify why its transformers appear not to be fully utilized, it does not alleviate the Department's concern regarding oversizing. MP's median substation transformer capacity utilization compared to normal ratings is 37.5 percent,[18] which compares to 58.4 percent for Xcel[19] and 74.6 percent for the Dakota Electric Association (DEA).[20] Compared to DEA, MP's substation transformer capacity utilization is essentially half. While the Department understands that N-1 capacity is an important concern, the Department does not see a reason why MP's N-1 capacity conditions are substantially different from either Xcel's or DEA's. MP's response does not explain the disparity in substation transformer capacity utilization. MP plans large capital expenditures to replace its substation transformers, and in a highly inflationary environment for transformers, smaller transformers could result in substantial cost savings for MP's ratepayers. As the Department continues to explore how rate regulated utilities plan substation capacity utilization, the Department may seek further analysis from MP regarding winter capacity ratings, emergency ratings, and N-1 redundancy. At this time, while the Department continues to collect information about substation capacity utilization, the Department does not issue a formal recommendation for analysis by MP. The Department is committed to continued dialogue with MP regarding capacity sizing for its substation transformers, and expects that MP will incorporate the Department's feedback into its planned capital projects that involve substation transformer replacement.

D.2. Accelerated Age Related Replacement Budget

[17] MP Reply Comments at 5-6.
[18] Department Initial Comments at 9.
[19] Department Reply Comments to Xcel's 2025 IDP at 38.
[20] Department Initial Comments on DEA's 2025 IDP at 9.

In its initial comments, the Department discussed MP's plan to accelerate its age-related replacements above depreciation level spending, and the Department made a recommendation for MP to analyze the cost effectiveness of this strategy.[21] The Department stated:

> The Department recommends the Commission order MP to conduct a cost benefit analysis of all Age Related Replacements and Asset Renewal projects with a 5-year budget of $10 million or greater. The cost benefit analysis should compare depreciation-level spending to MP's planned Age Related Replacements and Asset Renewal budget. In this analysis, MP should estimate reliability impacts in both cases and monetize the value of reliability to compare the cost effectiveness of MP's accelerated budget plan. The cost benefit analysis should be filed in MP's 2027 IDP.[22]

MP provides the following response to the Department's recommendation:

> The Company appreciates the Department's focus on the cost-effectiveness of asset renewal and shares the goal of ensuring efficient capital allocations to maintain and improve grid reliability and resilience. However, rather than utilize a nominal baseline such as depreciation-level spending that might lead to an underinvestment bias, the Company proposes the Commission consider a modification to the Department's recommendation to allow the Company to work with a consultant on innovative new cost benefit analysis programs and alternative baselines to depreciation-level spending that may be more representative of the Company's forward-looking approach to asset renewal, grid modernization, and risk management initiatives. The Company is willing to include the results of these efforts in the 2027 IDP.[23]

The Department thanks MP for its willingness to analyze alternative investment strategies and quantify the benefits of these strategies. The Department is open to MP's "alternative baselines to depreciation-level spending" as long as these baselines offer sufficient contrast of the costs and benefits of one strategy to another. The Department is not interested in the analysis of an investment strategy that may, for example, lead to violations of engineering standards or could otherwise lead to significant reliability concerns. With this understanding of "alternative baselines," the Department accepts MP's recommendation. The Department modifies its recommendation as follows:

> **The Department recommends the Commission order MP to conduct a cost benefit analysis of all Age Related Replacements and Asset Renewal projects with a 5-year budget of $10 million or greater. The cost benefit analysis should compare a realistic alternative baseline ~~depreciation-level~~ spending to MP's planned Age Related Replacements and Asset**

[21] Department Initial Comments at 15-17.
[22] *Id.*, at 17.
[23] MP Reply Comments at 12.

> **Renewal budget. In this analysis, MP should estimate reliability impacts in both cases and monetize the value of reliability to compare the cost effectiveness of MP's accelerated budget plan. The cost benefit analysis should be filed in MP's 2027 IDP.**

D.3. Final Recommendations

The Department makes the following new/modified recommendation:

> The Department recommends the Commission order MP to conduct a cost benefit analysis of all Age Related Replacements and Asset Renewal projects with a 5-year budget of $10 million or greater. The cost benefit analysis should compare a realistic alternative baseline spending to MP's planned Age Related Replacements and Asset Renewal budget. In this analysis, MP should estimate reliability impacts in both cases and monetize the value of reliability to compare the cost effectiveness of MP's accelerated budget plan. The cost benefit analysis should be filed in MP's 2027 IDP.

E. WILDFIRE MITIGATION

E.1. Compliance Filing

In initial comments the Department discussed MP's four-phased Wildfire Mitigation Plan (WMP) development plan and recommended the Commission require MP:

> [T]o file a compliance filing in this docket after phase one of MP's wildfire mitigation plan development is complete. The filing should include the results of phase one of its Wildfire Mitigation Plan, including the Company's wildfire risk map and its methodology, its identified hazardous fire areas, a timeline for the remaining phases, and a proposed budget relating to continued development of the plan.[24]

Phase one of MP's WMP development plan includes the development of MP's wildfire risk map.[25] The Company states it will work with industry-leading consultants to develop a map to identify hazardous fire areas based on the development of risk factors including vegetation information, wild-land interface areas, and others.[26] Phases two through four included a wildfire risk model, calibrating a fire potential index, and finally the creation of a wildfire mitigation plan.[27] It was the Department's understanding that MP's phased approach would be sequential. In reply comments, MP states its WMP development plan process is more of a "single, interrelated, and iterative four-phased framework

[24] Department Initial Comments at 23.
[25] 2025 IDP at 67.
[26] *Id*., at 67.
[27] *Id*., at 67-68.

rather than a series of independent phases."[28] MP discusses that a compliance filing at the conclusion of phase one of its WMP plan would not depict a full picture of the Company's WMP due to the interrelated nature of development framework.[29]

It was not the Department's intent to evaluate the entirety of MP's WMP, but only the first phase of the Company's development plan. The Department acknowledges that the process of developing the whole of the WMP will be iterative and ultimately incomplete after merely creating the map. The intent of the Department's recommended compliance filing would be to review the Company's mapping process, including how the risk factors and hazardous fire areas were identified. The Company states in its IDP that once it has identified the hazardous fire areas within its service territory—which the Department understands to be phase one of MP's WMP development plan—it will have a better sense of the additional system investments and the resources needed to properly mitigate wildfire risk in its territory.[30]

The Department's recommendation for early stakeholder involvement in the present docket is based on the Department's experience evaluating Xcel's wildfire mitigation proposals in its most recent rate case. The Department's analysis of wildfire risk in Xcel's territory was wholly different than what was presented in Xcel's analysis, as detailed in the Department's initial comments in Xcel's IDP proceeding.[31] The Department's analysis led to substantially different recommendations for wildfire mitigation spending in Xcel's planning and test years. The Department's recommendation for an early compliance filing and early stakeholder involvement in this docket would allow for review in the foundational development phase. If stakeholder agreement can be garnered in creation of the map, identification of risk factors, and identification of the hazardous fire areas, more resources could be dedicated to mitigating actual fires in future proceedings.

However, the Department acknowledges that both the interrelatedness of MP's WMP development process and the limited amount of time between a potential order in the present IDP and the next filing date, could make effective review of a compliance filing complicated. The Department concludes that although an initial review of MP's wildfire map would alleviate future workload, it is not entirely necessary for future review. The Department withdraws the following recommendation from initial comments:

> **The Department recommends the Commission require MP to file a compliance filing in this docket after phase one of MP's wildfire mitigation plan development is complete. The filing should include the results of phase one of its Wildfire Mitigation Plan, including the Company's wildfire risk map and its methodology, its identified**

[28] MP Reply Comments at 9.
[29] *Ibid*.
[30] *Id*., at 68.
[31] *In the Matter of Xcel Energy's 2025 Integrated Distribution Plan*, Department Initial Comments [Public Version], February 26, 2026, Docket No. E002/M-25-142, (eDockets) 20262-228738-02 at 70-75.

hazardous fire areas, a timeline for the remaining phases, and a proposed budget relating to continued development of the plan.

E.2. WMP Recommendation

The Department recommended the Commission require MP to file a WMP as an attachment or supplement to its next IDP and to include several elements. MP did not provide feedback on the individual elements of the Department's WMP recommendations, but MP did disagree with the docketed location of the filing.

MP asserts that wildfire risk is a statewide and interconnected risk, and that evaluation in the IDP may silo the approach to managing risk. MP states that siloing the WMP to the IDP may reduce utilities' opportunities for alignment, coordination, and integration of risk mitigation strategies, constrain the ability to compare approaches across utilities, and increase barriers to entry for interested stakeholders like the Forest Service or the Department of Natural Resources. MP also states that wildfire mitigation strategies are integrated across the Company—generation, transmission, and distribution—and evaluation in only the IDP would not account for enterprise-wide impacts on the Company.[32]

The Department's recommendation to file the utilities' WMP as part of the IDPs was largely a consideration of stakeholder resources. Although the IDPs are substantial filings, it is commonplace for stakeholders to be involved as their expertise allows, especially in the Transportation Electrification Plan, which garners attention from stakeholders not usually involved in the larger IDP process. The Department contends that stakeholders interested in interacting with the utilities' WMP would not have to be involved in the larger IDP process if that process were outside of their organization's scope or general interest.

The Department prefers and continues to support its recommendation from initial comments to add WMP to the IDP proceeding. The Department also understands the benefits of evaluating wildfire risk at a system-level—generation, transmission, and distribution. If the Commission prefers a separate proceeding for wildfire mitigation planning across utilities, the Department will participate.

The Department maintains the following recommendation from initials with modifications:

The Department recommends that the Commission require Minnesota Power to file its future Wildfire Mitigation Plan with the Commission as an attachment or supplement to its IDP. The Department recommends the Commission require MP to include at least the following in its Wildfire Mitigation Plan:

[32] 2025 IDP at 10.

- **A description of the intent of the Company in mitigating wildfire risk (i.e. mitigating utility-caused wildfires/minimizing liability or mitigating fire damage to utility assets).**

- **A definition of "wildfire" as it is used for utility identification, planning and mitigation.**

- **A discussion of its risk modelling, mapping and project prioritization process within its Wildfire Mitigation Plan.**

- **Quantification of actual wildfire risk in MP's territory based on the probability of a fire, and land use.**

    - **Wildfire risk should be compared to other reliability and safety risks experienced by MP as well as the wildfire risk experienced in MP's other jurisdictions.**

    - **Quantification of wildfire damages by event size, including MP-owned and other property damage, applicable liability, and any other costs MP deems reasonable to include.**

- **The most recent version of its wildfire risk map with a narrative explanation of the highest risk areas, and any changes from the last iteration of the Wildfire Mitigation Plan.**

- **Reporting on the number and location of wildfires experienced in its territory, the number of outages caused by wildfire, and the average length of wildfire-related outage over the last ten years.**

- **Reporting on the efficacy of its wildfire mitigation strategy in reducing wildfire-related outages (i.e. After deployment of the approved wildfire mitigation measures, wildfire-related outages in MP's territory decreased 50 percent; the average length of wildfire-related outage decreased by 20 percent.[33]).**

- **A full cost benefit analysis of any proposals.**

E.3. Contractual Services for WMP review

As WMP are relevantly new for utility planning dockets as well as for regulator and stakeholder review, the Department anticipates that the review of each utility's WMP would be significantly improved by the addition of a contractor. An outside contractor would bring additional insight and WMP expertise that is not currently housed within the Department. The Department estimates that contractual

[33] Values are arbitrary given as examples for how MP could demonstrate the efficacy of its Wildfire Mitigation Plan.

services could cost up to $300,000**.** The Department estimates these costs in the context of the costs incurred for contractual services in Xcel and OTP's ongoing rate cases to review proposed wildfire expenditures. The Department anticipates hiring one contractor for review of all the utilities' WMP in the next IDP cycle—resulting in approximately a two-year contract. The Department asserts that proper review of utility WMP could aid in balancing the risk of wildfire in each utility territory and the costs to Minnesota ratepayers. WMPs have the potential to be a significant spending category, which raises important affordability questions for Minnesota ratepayers.

The Department recommends the Commission authorize the Department to spend up to $300,000 to obtain contractual services for wildfire mitigation plan reviews.

E.4. Final Recommendations

The Department makes the following modified recommendation:

> The Department recommends that the Commission require Minnesota Power to file its future Wildfire Mitigation Plan with the Commission as an attachment or supplement to its IDP. The Department recommends the Commission require MP to include at least the following in its Wildfire Mitigation Plan:
>
> - A description of the intent of the Company in mitigating wildfire risk (i.e. mitigating utility-caused wildfires/minimizing liability or mitigating fire damage to utility assets).
> - A definition of "wildfire" as it is used for utility identification, planning and mitigation.
> - A discussion of its risk modelling, mapping and project prioritization process within its Wildfire Mitigation Plan.
> - Quantification of actual wildfire risk in MP's territory based on the probability of a fire, and land use.
>   - Wildfire risk should be compared to other reliability and safety risks experienced by MP as well as the wildfire risk experienced in MP's other jurisdictions.
> - Quantification of wildfire damages by event size, including MP-owned and other property damage, applicable liability, and any other costs MP deems reasonable to include.
> - The most recent version of its wildfire risk map with a narrative explanation of the highest risk areas, and any changes from the last iteration of the Wildfire Mitigation Plan.

- Reporting on the number and location of wildfires experienced in its territory, the number of outages caused by wildfire, and the average length of wildfire-related outage over the last ten years.

- Reporting on the efficacy of its wildfire mitigation strategy in reducing wildfire-related outages (i.e. After deployment of the approved wildfire mitigation measures, wildfire-related outages in MP's territory decreased 50 percent; the average length of wildfire-related outage decreased by 20 percent[34]).

- A full cost benefit analysis of any proposals.

The Department maintains the following recommendation:

> The Department recommends the Commission require MP to file a compliance filing in this docket after phase one of MP's wildfire mitigation plan development is complete. The filing should include the results of phase one of its Wildfire Mitigation Plan, including the Company's wildfire risk map and its methodology, its identified hazardous fire areas, a timeline for the remaining phases, and a proposed budget relating to continued development of the plan.

F. NON-WIRES ALTERNATIVES ANALYSIS

In its initial comments, the Department requested that MP provide clarification on how the Company satisfies Order Point 5 of the Commission's 2023 IDP Order. The Department stated:

> The Department requests that MP clarify in its reply comments how the Company satisfies the requirement to consider demand response, energy efficiency, and renewable generation within its NWA analysis.

MP provides the following response:

> The Company has a long history of supporting energy efficiency, demand response, and renewable generation through customer programs. However, fully leveraging these demand-side resources for NWA purposes presents several challenges. Participation in customer programs can vary over time, and customers may change equipment, behavior, or enrollment without notice, making it difficult to guarantee consistent and dispatchable load relief. Without enhanced monitoring, automation, and verification tools, these uncertainties make demand-side resources difficult to depend on as primary NWA solutions. The Company will continue to include these resources in future NWA evaluations and assess

[34] Values are arbitrary given as examples for how MP could demonstrate the efficacy of its Wildfire Mitigation Plan.

> additional opportunities to integrate demand-side applications into future NWA analyses as enabling tools evolve.[35]

MP indicates that the Company faces challenges such as variability in customer participation and the lack of tools for monitoring, automation, and verification as constraints that affect the extent to which these resources serve as primary NWA solutions.[36] MP therefore reports that it considers demand-side resources within its NWA analysis while it accounts for operational constraints on their deployment.

MP also included a brief summary of how the Company considered benefits from both energy efficiency and renewable generation in its cost-benefit analysis as part of its 2023 NWA study. MP provides the following response:

> All scenarios in the 2023 Non-Wire Alternative Study included assessment of non-wire solutions such as integrated volt-var control (energy efficiency) to improve power quality and conservation voltage reduction ("CVR"), battery energy storage system to provide backup capability (demand response), and fault location, isolation, and service restoration ("FLISR").[37]

The Department finds that MP satisfies the Order requirement.

F.1. Final Recommendations

The Department does not make any recommendations in this section.

G. GRID MODERNIZATION

In its initial comments, the Department made a recommendation for additional reporting requirements for MP's grid modernization projects. The Department stated:

> The Department recommends the Commission require MP to report on the actual reliability benefits and actual costs of the projects in its grid modernization budget category in its next IDP. The reporting of actual reliability benefits and actual costs should include at least MP's FLISR, MODS, and Single Phase Reclosers projects, as well as the Askov and Kerrick BESS projects. Where there is sufficient data, reporting should include the actual reliability benefits and costs of individual installations.[38]

MP states that the information requested by the Department is already provided in its SRSQ:

[35] MP Reply Comments at 7.
[36] *Ibid*.
[37] *Id*., at 6.
[38] Department Initial Comments at 26.

> The Company appreciates the Department's recommendations and shares the goal of ensuring that grid modernization investments deliver verifiable value to our customers and the system. To that end, program budgets are identified in the 2025 IDP. Specifically, section VII. Distribution System Modernization and Infrastructure Investment Plans, and actual reliability benefits associated with FLISR, MODS, and recloser projects are currently captured and provided within the annual SRSQ report. Specifically, section V. "Reliability Metrics Reporting". The Company tracks these metrics by feeder once the project to a specific feeder is complete. If this existing reporting structure and format does not fully comply with the Department's objectives, the Company welcomes continued dialogue with the Department to identify a more equitable and innovative solution that provides transparency, integrity, and efficiency.[39] [Citation omitted.]

Upon review of MP's SRSQ reporting, the Department finds that the information is not available at the level of detail requested and does not include specific cost information. The Department's primary interest in the requested information is to evaluate the cost effectiveness of different reliability-improving interventions to be used for evaluation when MP selects projects. Despite the gap in published information, the Department finds that it is sufficient for MP to keep reporting its existing outcome metrics in its SRSQ. The Department anticipates future reliability projects in the IDP will include outcome metrics, consistent with current practice in SRSQ reporting, to support comparative analysis in the IDP. As MP develops a cost effectiveness methodology for its reliability improvement programs, the Department may request data as needed. Given these considerations, the Department withdraws its recommendation.

G.1. Final Recommendations

The Department withdraws the following recommendation:

> The Department recommends the Commission require MP to report on the actual reliability benefits and actual costs of the projects in its grid modernization budget category in its next IDP. The reporting of actual reliability benefits and actual costs should include at least MP's FLISR, MODS, and Single Phase Reclosers projects, as well as the Askov and Kerrick BESS projects. Where there is sufficient data, reporting should include the actual reliability benefits and costs of individual installations.

H. TEP

H.1. Commercial Public EV Charging Rate

[39] MP Reply Comments at 13.

In its initial comments, the Department requested MP provide additional detail on its Commercial Public EV Charging rate.[40] In its IDP, MP stated that only 17 of the 74 publicly available charging stations in its service territory were on the Commercial Public EV Charging rate.[41] The Department made the following requests of MP:

> The Department requests that MP, in reply comments, explain why utilization of the Commercial Public Charging EV Rate is low.
>
> The Department requests MP, in reply comments, discuss how it intends to increase utilization of its Commercial Public Charging EV Rate.

MP states that at the time of filing, there were 74 public EV charging stations, representing both level 2 and level 3 chargers, in the Company's service territory.[42] At the time of filing its reply comments, MP states that there are now 84 public charging stations in its territory.[43] MP states that its Commercial Public EV Charging rate requires the installation of a second service.[44] MP states that the rate is most commonly used by Level 3 chargers due to the second service requirement; oftentimes, states MP, level 2 chargers do not require a second service.[45] MP states that of the 84 public charging stations in its territory, 32 include a level 3 charger. MP also discusses that there are only 35 charging stations on its Commercial Public EV Charging rate and 26 of those sites include a level 3 charger. The Company states that it is capturing about 81 percent of the public level 3 EV chargers in its service territory with the rate. The Company states that it continues to work closely with electricians and car dealerships to increase awareness of its EV charging rate options.[46] The Company plans to increase engagement efforts with the participation of a "participating electrician network" as was discussed in MP's original petition for its multi-dwelling unit pilot program.[47]

H.2. Future and Historical Spending

The Department requested additional detail into historical and future spending on transportation electrification from MP in replies. The Department requested the following:

- Regarding historical spending:
  - Annual amounts for the historical spending,
  - Identify labor costs separately from rebates, and
  - Identify the amounts for specific rebate programs.
- Regarding future spending:
  - Annual amounts for each of the budget categories,

[40] Department initial comments at 35.
[41] 2025 IDP at Attachment E, 11.
[42] *Id*., at 11-12.
[43] MP Reply Comments at 14.
[44] *Ibid.*
[45] *Ibid.*
[46] *Ibid.*
[47] *In the Matter of a Commission Inquiry into Electric Vehicle Charging and Infrastructure,* Petition, Minnesota Power, Docket No. E015/M-23-258, (eDockets) 202412-213271-01, at pdf 17-18.

- Identify capital and O&M costs by each initiative,
- Identify labor costs separately from rebates,
- Identify the amounts for specific rebate programs.[48]

MP provided the requested tables in more detail.[49] The Department appreciates MP's response and requests the Company provide the level of detail included in its reply comments in future IDPs.

Further, the Department requested additional clarification from MP in its reply comments regarding how its labor costs will be utilized to further transportation electrification.[50] The Company states that labor costs associated with transportation electrification usually consist of activities required to promote and deliver EV programs including responding to customer questions, creating awareness about EVs at community and customer events and delivering customer programs.[51]

The Department appreciates MP's response and has no further recommendation at this time.

H.3. Equity Measurement

In its initial comments, the Department several recommendations aimed at measuring the reach of MP's transportation electrification portfolio. The Order approving the 2023 TEP required:

> Minnesota Power shall include in future TEPs a discussion of equity and an analysis of how the Company's EV programs are serving communities disproportionately impacted by transportation pollution including renters, multifamily housing residents, communities of color, low- to moderate-income customers, and rural communities. Minnesota Power shall also include a discussion on what gaps may remain.[52]

Though there was a narrative discussion of the equity of MP's programs in the TEP, there was little actual measurement of the locations or populations reached by MP's TEP programs. To address this deficit, the Department recommended the Commission require the following reporting in MP's future TEPs:

- The percentage of its commercial sites located in areas disproportionately impacted by transportation pollution, broken out by commercial program.

[48] Department Initial Comments at 40.
[49] MP Reply Comments at 15.
[50] *Ibid.*
[51] MP Reply Comments at 16.
[52] *In the Matter of Minnesota Power's 2023 Integrated Distribution Plan, Order Accepting 2023 Integrated Distribution Plan and Transportation Electrification Plan, and Modifying Reporting Requirements*, September 16, 2024, Docket No. E015/M-23-258, (eDockets) 20249-210224-01, at Order Point 10.

- The percentage of residential EV program customers located in areas disproportionately impacted by transportation pollution, broken out by residential program.

- The percentage of residential EV program customers that live in areas where both renters and multifamily units make up 50 percent of the housing units, broken out by program.

- The percentage of residential EV program customers located in census tracts where 40 percent or more of the people identify as people of color, broken out by program.

- The percentage of residential EV program customers located in census tracts where 35 percent or more of households have an income that is at or below 200 percent of the federal poverty level, broken out by program.

- The percentage of residential EV program customers located in rural communities, broken out by program.[53]

MP states that it appreciates the recommendations from the Department regarding the tracking of specific demographic and geographic metrics for EV programs. The Company shares the values inherent in these requests and the objectives of ensuring that the benefits of transportation electrification are distributed equitably across the Company's service territory. The Company is committed to analyzing these metrics to the greatest extent possible.[54] The Company states that there are complexities in sourcing the data necessary to report on the aforementioned metrics (*i.e.* the metrics requested are not standard to the Minnesota Pollution Control Agency's Environmental Justice Map), but that it will work to provide the information within the constraints of available and actionable data. The Company states that it may propose collaboration with interested parties to identify reasonable alternatives if some of the data is not readily available. The Department appreciates MP's commitment to equity measurement in future TEPs and looks forward to continued collaboration.

The Department maintains its recommendation from initial comments:

The Department recommends the Commission require MP to report on the following in future TEPs:

- **The percentage of its commercial sites located in areas disproportionately impacted by transportation pollution, broken out by commercial program.**
- **The percentage of residential EV program customers located in areas disproportionately impacted by transportation pollution, broken out by residential program.**

[53] Department Initial Comments at 41.
[54] MP Reply Comments at 17.

- **The percentage of residential EV program customers that live in areas where both renters and multifamily units make up 50 percent of the housing units, broken out by program.**
- **The percentage of residential EV program customers located in census tracts where 40 percent or more of the people identify as people of color,[55] broken out by program.**
- **The percentage of residential EV program customers located in census tracts where 35 percent or more of households have an income that is at or below 200 percent of the federal poverty level,[56] broken out by program.**
- **The percentage of residential EV program customers located in rural communities, broken out by program.**

H.4. Final Recommendations

The Department maintains the following recommendation:

The Department recommends the Commission require MP to report on the following in future TEPs:

- The percentage of its commercial sites located in areas disproportionately impacted by transportation pollution, broken out by commercial program.
- The percentage of residential EV program customers located in areas disproportionately impacted by transportation pollution, broken out by residential program.
- The percentage of residential EV program customers that live in areas where both renters and multifamily units make up 50 percent of the housing units, broken out by program.
- The percentage of residential EV program customers located in census tracts where 40 percent or more of the people identify as people of color,[57] broken out by program.
- The percentage of residential EV program customers located in census tracts where 35 percent or more of households have an income that is at or below 200 percent of the federal poverty level,[58] broken out by program.
- The percentage of residential EV program customers located in rural communities, broken out by program.

[55] Minn. Stat. § 216B.1691, Subd. 1(e)(1).
[56] Minn. Stat. § 216B.1691, Subd. 1(e)(2)
[57] Minn. Stat. § 216B.1691, Subd. 1(e)(1).
[58] Minn. Stat. § 216B.1691, Subd. 1(e)(2)

IV. DEPARTMENT RECOMMENDATIONS

Based on analysis of Minnesota Power's 2025 IDP and the information in the record, the Department has prepared the final recommendations, which are provided below.

A. IDP SCHEDULE

- A.1. The Department recommends the Commission order either A or B:
  A. Xcel file its IDP, TEP, and IDP-Related Ad Hoc filings in odd-numbered years. MP, DEA, and OTP file their IDP and TEP in even-numbered years, with the next filing due in 2028.
  B. All IDPs are filed in odd-numbered years. All TEPs and IDP-Related Ad Hoc Filings are filed in even-numbered years, with the next filing due in 2028.

C. SYSTEM EXPANSION OR UPGRADES FOR RELIABILITY AND POWER QUALITY

- C.1. The Department recommends the Commission require MP to implement, on a phased basis, a process to quantify the value of major reliability and resiliency investments, such as strategic undergrounding, using a recognized customer interruption cost approach (e.g, an Interruption Cost Estimate [ICE] calculator methodology) or a similar recognized approach developed in consultation with the Department and other stakeholder, and to apply that value consistently in cost-benefit comparisons across alternatives.
- C.2. The Department recommends the Commission require the Company to develop clear reporting metrics for its reliability projects (e.g., miles converted, segments addressed) and provide a clear methodology for selecting segments in their distribution system.
- C.3. The Department recommends that strategic undergrounding be evaluated alongside other reliability tools that can materially reduce outage minutes on targeted feeders.

D. AGE RELATED REPLACEMENTS AND ASSET RENEWAL

- D.1. The Department recommends the Commission order MP to conduct a cost benefit analysis of all Age Related Replacements and Asset Renewal projects with a 5-year budget of $10 million or greater. The cost benefit analysis should compare a realistic alternative baseline spending to MP's planned Age Related Replacements and Asset Renewal budget. In this analysis, MP should estimate reliability impacts in both cases and monetize the value of reliability to compare the cost effectiveness of MP's accelerated budget plan. The cost benefit analysis should be filed in MP's 2027 IDP.

E. WILDFIRE MITIGATION

- E.1. The Department recommends that the Commission require Minnesota Power to file its future Wildfire Mitigation Plan with the Commission as an attachment or supplement to its IDP. The Department recommends the Commission require MP to include at least the following in its Wildfire Mitigation Plan:

- A description of the intent of the Company in mitigating wildfire risk (i.e. mitigating utility-caused wildfires/minimizing liability or mitigating fire damage to utility assets).
- A definition of "wildfire" as it is used for utility identification, planning and mitigation.
- A discussion of its risk modelling, mapping and project prioritization process within its Wildfire Mitigation Plan.
- Quantification of actual wildfire risk in MP's territory based on the probability of a fire, and land use.
- Wildfire risk should be compared to other reliability and safety risks experienced by MP as well as the wildfire risk experienced in MP's other jurisdictions.
- Quantification of wildfire damages by event size, including MP-owned and other property damage, applicable liability, and any other costs MP deems reasonable to include.
- The most recent version of its wildfire risk map with a narrative explanation of the highest risk areas, and any changes from the last iteration of the Wildfire Mitigation Plan.
- Reporting on the number and location of wildfires experienced in its territory, the number of outages caused by wildfire, and the average length of wildfire-related outage over the last ten years.
- Reporting on the efficacy of its wildfire mitigation strategy in reducing wildfire-related outages (i.e. After deployment of the approved wildfire mitigation measures, wildfire-related outages in MP's territory decreased 50 percent; the average length of wildfire-related outage decreased by 20 percent).
- A full cost benefit analysis of any proposals.

- E.2. The Department recommends the Commission require MP to file a compliance filing in this docket after phase one of MP's wildfire mitigation plan development is complete. The filing should include the results of phase one of its Wildfire Mitigation Plan, including the Company's wildfire risk map and its methodology, its identified hazardous fire areas, a timeline for the remaining phases, and a proposed budget relating to continued development of the plan.

G. GRID MODERNIZATION

- G.1. The Department recommends the Commission require MP to report on the actual reliability benefits and actual costs of the projects in its grid modernization budget category in its next IDP. The reporting of actual reliability benefits and actual costs should include at least MP's FLISR, MODS, and Single Phase Reclosers projects, as well as the Askov and Kerrick BESS projects. Where there is sufficient data, reporting should include the actual reliability benefits and costs of individual installations.

H. TEP

- H.1. The Department recommends the Commission require MP to report on the following in future TEPs:
    - The percentage of its commercial sites located in areas disproportionately impacted by transportation pollution, broken out by commercial program.
    - The percentage of residential EV program customers located in areas disproportionately impacted by transportation pollution, broken out by residential program.
    - The percentage of residential EV program customers that live in areas where both renters and multifamily units make up 50 percent of the housing units, broken out by program.
    - The percentage of residential EV program customers located in census tracts where 40 percent or more of the people identify as people of color,[59] broken out by program.
    - The percentage of residential EV program customers located in census tracts where 35 percent or more of households have an income that is at or below 200 percent of the federal poverty level,[60] broken out by program.
    - The percentage of residential EV program customers located in rural communities, broken out by program.

[59] Minn. Stat. § 216B.1691, Subd. 1(e)(1).
[60] Minn. Stat. § 216B.1691, Subd. 1(e)(2)

Attachments

CERTIFICATE OF SERVICE

I, Sharon Ferguson, hereby certify that I have this day, served copies of the following document on the attached list of people by electronic filing, certified mail, e-mail, or by depositing a true and correct copy thereof properly enveloped with postage paid in the United States Mail at St. Paul, Minnesota.

Minnesota Department of Commerce
Reply Comments

Docket No. E015/M-25-140

Dated this **24th** day of **April 2026**

/s/Sharon Ferguson

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31	Christopher	Browning	christopher.browning@nexteraenergy.com			null null, null United States	Electronic Service		No	M-25-140
32	Christina	Brusven	cbrusven@fredlaw.com	Fredrikson Byron		60 S 6th St Ste 1500 Minneapolis MN, 55402-4400 United States	Electronic Service		No	M-25-140
33	Mike	Bull	mike.bull@state.mn.us		Public Utilities Commission	121 7th Place East, Suite 350 St. Paul MN, 55101 United States	Electronic Service		Yes	M-25-140
34	Jerry	Byer	jbyer@itasca-mantrap.com	Itasca-Mantrap Electric Cooperative		PO Box 192 Park Rapids MN, 56470 United States	Electronic Service		No	M-25-140
35	Jennifer	Cady	jjcady@mnpower.com	Minnesota Power		30 W Superior St Duluth MN, 55802 United States	Electronic Service		No	M-25-140
36	Daniel T	Carlisle	todd-wad@toddwadena.coop	Todd-Wadena Electric Cooperative		550 Ash Ave NE PO Box 431 Wadena MN, 56482 United States	Electronic Service		No	M-25-140
37	Douglas M.	Carnival	dcarnival@carnivalberns.com	McGrann Shea Carnival Straughn & Lamb		800 Nicollet Mall Ste 2600 Minneapolis MN, 55402-7035 United States	Electronic Service		No	M-25-140
38	Pat	Carruth	pat@mnvalleyrec.com	Minnesota Valley Coop. Light & Power Assn.		501 S 1st St. PO Box 248 Montevideo MN, 56265 United States	Electronic Service		No	M-25-140
39	Gabriel	Chan	gabechan@umn.edu			130 Hubert H. Humphrey Center 301 19th Ave S Minneapolis MN, 55455 United States	Electronic Service		No	M-25-140
40	Ray	Choquette	rchoquette@agp.com	Ag Processing Inc.		12700 West Dodge Road PO Box 2047 Omaha NE, 68103-2047 United States	Electronic Service		No	M-25-140
41	Eric	Clement	eclement@mnpower.com	Minnesota Power		null null, null United States	Electronic Service		No	M-25-140
42	City	Clerk	gregg.engdahl@ci.stcloud.mn.us	City of St. Cloud		400 Second St. S	Electronic Service		No	M-25-140

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						St. Cloud MN, 56301 United States				
43	Joshua	Cohen	josh.cohen@swtchenergy.com	SWTCH Energy, Inc.		Greentown Labs 444 Somerville Avenue Somerville MA, 02143 United States	Electronic Service		No	M-25-140
44	Kenneth A.	Colburn	kcolburn@symbioticstrategies.com	Symbiotic Strategies, LLC		26 Winton Road Meredith NH, 32535413 United States	Electronic Service		No	M-25-140
45	Steve	Coleman	stevecolemanpuma@gmail.com			231 Winifred St W Saint Paul MN, 55107 United States	Electronic Service		No	M-25-140
46	Generic	Commerce Attorneys	commerce.attorneys@ag.state.mn.us		Office of the Attorney General - Department of Commerce	445 Minnesota Street Suite 1400 St. Paul MN, 55101 United States	Electronic Service		Yes	M-25-140
47	Kevin	Cray	kevin@communitysolaraccess.org	CCSA		1644 Platte St Denver CO, 80202 United States	Electronic Service		No	M-25-140
48	George	Crocker	gwillc@nawo.org	North American Water Office		5093 Keats Avenue Lake Elmo MN, 55042 United States	Electronic Service		No	M-25-140
49	Stacy	Dahl	sdahl@minnkota.com	Minnkota Power Cooperative, Inc.		5301 32nd Ave S Grand Forks ND, 58201 United States	Electronic Service		No	M-25-140
50	George	Damian	gdamian@cleanenergyeconomymn.org	Clean Energy Economy MN		13713 Washburn Ave S Burnsville MN, 55337 United States	Electronic Service		No	M-25-140
51	Lisa	Daniels	lisadaniels@windustry.org	Windustry		201 Ridgewood Ave Minneapolis MN, 55403 United States	Electronic Service		No	M-25-140
52	James	Darabi	james.darabi@solarfarm.com			2355 Fairview Ave #101 St. Paul MN, 55113 United States	Electronic Service		No	M-25-140
53	Cody	Davis	cdavis@epeconsulting.com	Electric Power Engineers (ELPC/VS)		null null, null United States	Electronic Service		No	M-25-140
54	Danielle	DeMarre	danielle.demarre@allenergysolar.com	All Energy Solar		1264 Energy Lane St Paul MN, 55108 United States	Electronic Service		No	M-25-140
55	Timothy	DenHerder Thomas	timothy@cooperativeenergyfutures.com	Cooperative Energy Futures		3500 Bloomington Ave. S Minneapolis MN, 55407 United States	Electronic Service		No	M-25-140
56	James	Denniston	james.r.denniston@xcelenergy.com	Xcel Energy Services, Inc.		414 Nicollet Mall, 401-8 Minneapolis MN, 55401 United States	Electronic Service		No	M-25-140

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
57	Curt	Dieren	curt.dieren@dgr.com	L&O Power Cooperative		1302 S Union St Rock Rapids IA, 51246 United States	Electronic Service		No	M-25-140
58	Cheryl	Dietrich	cheryl.dietrich@nexteraenergy.com	NextEra Energy Resources, LLC		700 Universe Blvd E1W/JB Juno Beach FL, 33408 United States	Electronic Service		No	M-25-140
59	Diane	Dietz	diane.dietz@state.mn.us		Department of Commerce	Suite 280 85 Seventh Place East St. Paul MN, 55101-2198 United States	Electronic Service		No	M-25-140
60	Ian M.	Dobson	ian.m.dobson@xcelenergy.com	Xcel Energy		414 Nicollet Mall, 401-8 Minneapolis MN, 55401 United States	Electronic Service		No	M-25-140
61	Kristin	Dolan	kdolan@meeker.coop	Meeker Cooperative Light & Power Assn		1725 US Hwy 12 E. Ste 100 Litchfield MN, 55355 United States	Electronic Service		No	M-25-140
62	Renee	Doyle	guydoyleelectric@gmail.com	Doyle Electric Inc.		PO Box 295 Amboy MN, 56010 United States	Electronic Service		No	M-25-140
63	Carlon	Doyle Fontaine	carlon.doyle.fontaine@senate.mn	MN Senate		75 Rev Dr Martin Luther King Jr Blvd Room G-17 St Paul MN, 55155 United States	Electronic Service		No	M-25-140
64	Adam	Duininck	aduininck@ncsrcc.org	North Central States Regional Council of Carpenters		700 Olive Street St. Paul MN, 55130 United States	Electronic Service		No	M-25-140
65	John R.	Dunlop, P.E.	jdunlop@resminn.com	Renewable Energy Services		Suite 300 448 Morgan Ave. S. Minneapolis MN, 55405-2030 United States	Electronic Service		No	M-25-140
66	Hannah	Dunn	hannah.dunn@oakdalemn.gov	City of Oakdale		1584 Hadley Ave N Oakdale MN, 55104 United States	Electronic Service		No	M-25-140
67	Kelly	Dybdahl	kdybdahl@llec.coop	Lyon-Lincoln Electric Cooperative, Inc.		205 W. Hwy. 14 Tyler MN, 56178 United States	Electronic Service		No	M-25-140
68	Brian	Edstrom	briane@cubminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota St Ste W1360 Saint Paul MN, 55101 United States	Electronic Service		No	M-25-140
69	Dick	Edwards	dedwards@ci.maple-grove.mn.us	City of Maple Grove		12800 Arbor Lakes Parkway P O Box 1180 Maple Grove MN, 55311-6180 United States	Electronic Service		No	M-25-140
70	William	Ehrlich	wehrlich@tesla.com	Tesla, Inc.		3500 Deer Creek Rd Palo Alto CA, 94304 United States	Electronic Service		No	M-25-140

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
71	Kristen	Eide Tollefson	healingsystems69@gmail.com	R-CURE		28477 N Lake Ave Frontenac MN, 55026-1044 United States	Electronic Service		No	M-25-140
72	Bob	Eleff	bob.eleff@house.mn	Regulated Industries Cmte		100 Rev Dr Martin Luther King Jr Blvd Room 600 St. Paul MN, 55155 United States	Electronic Service		No	M-25-140
73	R. Neal	Elliot	rnelliott@aceee.org	American Council for an Energy-Efficient Economy		ACEEE 529 14th St NW Ste 600 Washington DC, 20045 United States	Electronic Service		No	M-25-140
74	Nadav	Enbar	nenbar@epri.com	EPRI		1117 Quince Ave Boulder CO, 80304 United States	Electronic Service		No	M-25-140
75	John	Farrell	jfarrell@ilsr.org	Institute for Local Self-Reliance		2720 E. 22nd St Institute for Local Self-Reliance Minneapolis MN, 55406 United States	Electronic Service		No	M-25-140
76	Christian	Fenstermacher	christian.fenstermacher@owatonnautilities.com	Owatonna Municipal Public Utilities		PO Box 800 208 S Walnut Ave Owatonna MN, 55060 United States	Electronic Service		No	M-25-140
77	Sharon	Ferguson	sharon.ferguson@state.mn.us		Department of Commerce	85 7th Place E Ste 280 Saint Paul MN, 55101-2198 United States	Electronic Service		No	M-25-140
78	Christine	Fox	cfox@itasca-mantrap.com	Itasca-Mantrap Coop. Electric Assn.		PO Box 192 Park Rapids MN, 56470 United States	Electronic Service		No	M-25-140
79	Kornbaum	Frank	fkornbaum@mnpower.com			null null, null United States	Electronic Service		No	M-25-140
80	Nathan	Franzen	nathan@nationalgridrenewables.com	Geronimo Energy, LLC		8400 Normandale Lake Blvd Ste 1200 Bloomington MN, 55437 United States	Electronic Service		No	M-25-140
81	David	Freestate	dfreestate@epri.com	EPRI		942 Corridor Park Blvd Knoxville TN, 37932 United States	Electronic Service		No	M-25-140
82	Katelyn	Frye	kfrye@mnpower.com	Minnesota Power		30 W Superiot St Duluth MN, 55802-2093 United States	Electronic Service		No	M-25-140
83	Jessica	Fyhrie	jfyhrie@otpco.com	Otter Tail Power Company		PO Box 496 Fergus Falls MN, 56538-0496 United States	Electronic Service		No	M-25-140
84	Edward	Garvey	garveyed@aol.com	Residence		32 Lawton St Saint Paul MN, 55102 United States	Electronic Service		No	M-25-140

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
85	Allen	Gleckner	agleckner@elpc.org	Environmental Law & Policy Center		35 E. Wacker Drive, Suite 1600 Suite 1600 Chicago IL, 60601 United States	Electronic Service		No	M-25-140
86	Jenny	Glumack	jenny@mrea.org	Minnesota Rural Electric Association		11640 73rd Ave N Maple Grove MN, 55369 United States	Electronic Service		No	M-25-140
87	Sean	Gosiewski	sean@afors.org	Alliance for Sustainability		2801 21st Ave S Ste 100 Minneapolis MN, 55407 United States	Electronic Service		No	M-25-140
88	Scott	Greenbert	scott@nautilussolar.com	Nautilus Solar Energy, LLC		396 Springfield Aver, Ste 2 Summit NJ, 07901 United States	Electronic Service		No	M-25-140
89	Sarah	Groebner	sgroebner@redwoodelectric.com	Redwood Electric Cooperative		60 Pine St Clements MN, 56224 United States	Electronic Service		No	M-25-140
90	Tim	Gross	tgross@fuelingmn.com	Fueling Minnesota		3244 Rice Street St. Paul MN, 55126 United States	Electronic Service		No	M-25-140
91	Cody	Gustafson	cgustafson@mnpower.com			null null, null United States	Electronic Service		No	M-25-140
92	Tom	Guttormson	tom.guttormson@connexusenergy.com	Connexus Energy		14601 Ramsey Blvd Ramsey MN, 55303 United States	Electronic Service		No	M-25-140
93	Natalie	Haberman	townsend@fresh-energy.org	Fresh Energy		408 St Peter St # 350 St. Paul MN, 55102 United States	Electronic Service		No	M-25-140
94	Nicholas	Haeg	haeg@fresh-energy.org			12298 Bass Trail Sauk Centre MN, 56378 United States	Electronic Service		No	M-25-140
95	James	Haler	jhaler@southcentralelectric.com	South Central Electric Association		71176 Tiell Dr P. O. Box 150 St. James MN, 56081 United States	Electronic Service		No	M-25-140
96	Joe	Halso	joe.halso@sierraclub.org	Sierra Club		1536 Wynkoop St Ste 200 Denver CO, 80202 United States	Electronic Service		No	M-25-140
97	Donald	Hanson	dfhanson@ieee.org			P. O. Box 44579 Eden Prairie MN, 55344 United States	Electronic Service		No	M-25-140
98	John	Harlander	john.c.harlander@xcelenergy.com	Xcel Energy		null null, null United States	Electronic Service		No	M-25-140
99	Kim	Havey	kim.havey@minneapolismn.gov	City of Minneapolis		350 South 5th Street, Suite 315M Minneapolis MN, 55415 United States	Electronic Service		No	M-25-140
100	Todd	Headlee	theadlee@dvigridsolutions.com	Dominion Voltage, Inc.		701 E. Cary Street	Electronic Service		No	M-25-140

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						Richmond VA, 23219 United States				
101	Amber	Hedlund	amber.r.hedlund@xcelenergy.com	Northern States Power Company dba Xcel Energy-Elec		414 Nicollet Mall, 401-7 Minneapolis MN, 55401 United States	Electronic Service		No	M-25-140
102	Tiana	Heger	theger@mnpower.com	Minnesota Power		30 W. Superior Street Duluth MN, 55802 United States	Electronic Service		No	M-25-140
103	Adam	Heinen	aheinen@dakotaelectric.com	Dakota Electric Association		4300 220th St W Farmington MN, 55024 United States	Electronic Service		No	M-25-140
104	Annete	Henkel	mui@mnutilityinvestors.org	Minnesota Utility Investors		413 Wacouta Street #230 St.Paul MN, 55101 United States	Electronic Service		No	M-25-140
105	Jessy	Hennesy	jessy.hennesy@avantenergy.com	Avant Energy		220 S. Sixth St. Ste 1300 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-140
106	Mari	Hernandez	mari@irecusa.org	IREC		null null, null United States	Electronic Service		No	M-25-140
107	Katherine	Hinderlie	katherine.hinderlie@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	445 Minnesota St Suite 1400 St. Paul MN, 55101-2134 United States	Electronic Service		No	M-25-140
108	Joe	Hoffman	ja.hoffman@smmpa.org	SMMPA		500 First Ave SW Rochester MN, 55902-3303 United States	Electronic Service		No	M-25-140
109	Michael	Hoppe	lu23@ibew23.org	Local Union 23, I.B.E.W.		445 Etna Street Ste. 61 St. Paul MN, 55106 United States	Electronic Service		No	M-25-140
110	Casey	Horan	choran@edf.org	Environmental Defense Fund		123 Mission St San Francisco CA, 94105 United States	Electronic Service		No	M-25-140
111	Ronald	Horman	rhorman@redwoodelectric.com	Redwood Electric Cooperative		60 Pine Street Clements MN, 56224 United States	Electronic Service		No	M-25-140
112	Frank	Hornstein	frank.hornstein@minneapolismn.gov	City of Minneapolis		350 South 5th Street Minneapolis MN, 55415 United States	Electronic Service		No	M-25-140
113	Samantha	Houston	shouston@ucsusa.org	Union of Concerned Scientists		1825 K St. NW Ste 800 Washington DC, 20006 United States	Electronic Service		No	M-25-140
114	Lori	Hoyum	lhoyum@mnpower.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	M-25-140

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
115	Jan	Hubbard	jan.hubbard@comcast.net			7730 Mississippi Lane Brooklyn Park MN, 55444 United States	Electronic Service		No	M-25-140
116	Dean	Hunter	dean.hunter@state.mn.us		Minnesota Department of Labor & Industry	443 Lafayette Rd N St. Paul MN, 55155-4341 United States	Electronic Service		No	M-25-140
117	Reuben	Hunter	bhunter@madisonei.com	Madison Energy Investments		8100 Boone Blvd Suite 430 Vienna VA, 22182 United States	Electronic Service		No	M-25-140
118	Casey	Jacobson	cjacobson@bepc.com	Basin Electric Power Cooperative		1717 East Interstate Avenue Bismarck ND, 58501 United States	Electronic Service		No	M-25-140
119	John S.	Jaffray	jjaffray@jjrpower.com	JJR Power		350 Highway 7 Suite 236 Excelsior MN, 55331 United States	Electronic Service		No	M-25-140
120	Robert	Jagusch	rjagusch@mmua.org	MMUA		3025 Harbor Lane N Minneapolis MN, 55447 United States	Electronic Service		No	M-25-140
121	Chris	Jarosch	chris@carrcreekelectricservice.com	Carr Creek Electric Service, LLC		209 Sommers Street North Hudson WI, 54016 United States	Electronic Service		No	M-25-140
122	Alan	Jenkins	aj@jenkinsatlaw.com	Jenkins at Law		2950 Yellowtail Ave. Marathon FL, 33050 United States	Electronic Service		No	M-25-140
123	Richard	Johnson	rickjohnson@cozen.com	Cozen O'Connor		150 S. 5th Street Suite 1200 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-140
124	Sarah	Johnson Phillips	sjphillips@stoel.com	Stoel Rives LLP		33 South Sixth Street Suite 4200 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-140
125	Nate	Jones	njones@hcpd.com	Heartland Consumers Power		PO Box 248 Madison SD, 57042 United States	Electronic Service		No	M-25-140
126	Philip	Jones	phil@evtransportationalliance.org			1402 Third Ave Ste 1315 Seattle WA, 98101 United States	Electronic Service		No	M-25-140
127	Julie	Jorgensen	julie@greenmark.us.com	Greenmark Solar		4630 Quebec Ave N New Hope MN, 55428-4973 United States	Electronic Service		No	M-25-140
128	Kevin	Joyce	kjoyce@tesla.com			null null, null United States	Electronic Service		No	M-25-140
129	Mahmoud	Kabalan	mahmoud.kabalan@stthomas.edu	University of St Thomas		2115 Summit Ave. Mail OSS100 School of Engineering	Electronic Service		No	M-25-140

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						Saint Paul MN, 55105 United States				
130	Camille	Kadoch	ckadoch@raponline.org	Regulatory Assistance Project		50 State Street Suite 3 Montpelier VT, 05602 United States	Electronic Service		No	M-25-140
131	Cliff	Kaehler	cliff.kaehler@novelenergy.biz	Novel Energy Solutions LLC		4710 Blaylock Way Inver Grove Heights MN, 55076 United States	Electronic Service		No	M-25-140
132	Ralph	Kaehler	ralph.kaehler@gmail.com			13700 Co. Rd. 9 Eyota MN, 55934 United States	Electronic Service		No	M-25-140
133	Michael	Kampmeyer	mkampmeyer@a-e-group.com	AEG Group, LLC		260 Salem Church Road Sunfish Lake MN, 55118 United States	Electronic Service		No	M-25-140
134	Nick	Kaneski	nick.kaneski@enbridge.com	Enbridge Energy Company, Inc.		11 East Superior St Ste 125 Duluth MN, 55802 United States	Electronic Service		No	M-25-140
135	Jack	Kegel	jkegel@mmua.org	MMUA		3025 Harbor Lane N Suite 400 Plymouth MN, 55447-5142 United States	Electronic Service		No	M-25-140
136	William	Kenworthy	will@votesolar.org			1 South Dearborn St Ste 2000 Chicago IL, 60603 United States	Electronic Service		No	M-25-140
137	Samuel B.	Ketchum	sketchum@kennedy-graven.com	Kennedy & Graven, Chartered		150 S 5th St Ste 700 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-140
138	Tom	Key	tkey@epri.com	EPRI		942 Corridor Park Blvd Knoxville TN, 37932 United States	Electronic Service		No	M-25-140
139	Bobby	King	bking@solarunitedneighbors.org	Solar United Neighbors		3140 43rd Ave S Minneapolis MN, 55406 United States	Electronic Service		No	M-25-140
140	Jack	Kluempke	jack.kluempke@state.mn.us		Department of Commerce	85 7th Place East Suite 600 St. Paul MN, 55101 United States	Electronic Service		No	M-25-140
141	Aaron	Knoll	aknoll@greeneespel.com	Greene Espel PLLP		222 South Ninth Street Suite 2200 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-140
142	Steve	Kosbab	skosbab@meeker.coop	Meeker Cooperative Light and Power		1725 US Hwy 12 E Litchfield MN, 55355 United States	Electronic Service		No	M-25-140
143	Nathan	Kostiuk	nathan.c.kostiuk@xcelenergy.com	Xcel Energy		414 Nicollet Mall, 401-07 Minneapolis	Electronic Service		No	M-25-140

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						MN, 55401 United States				
144	Brian	Krambeer	bkrambeer@mienergy.coop	MiEnergy Cooperative		PO Box 626 31110 Cooperative Way Rushford MN, 55971 United States	Electronic Service		No	M-25-140
145	Michael	Krause	michaelkrause61@yahoo.com			1200 Plymouth Avenue Minneapolis MN, 55411 United States	Electronic Service		No	M-25-140
146	Michael	Krikava	mkrikava@taftlaw.com	Taft Stettinius & Hollister LLP		2200 IDS Center 80 S 8th St Minneapolis MN, 55402 United States	Electronic Service		No	M-25-140
147	Corrina	Kumpe	ckumpe@mysunshare.com			null null, null United States	Electronic Service		No	M-25-140
148	Matthew	Lacey	mlacey@grenergy.com	Great River Energy		12300 Elm Creek Boulevard Maple Grove MN, 55369-4718 United States	Electronic Service		No	M-25-140
149	James D.	Larson	james.larson@avantenergy.com	Avant Energy Services		220 S 6th St Ste 1300 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-140
150	Mark	Larson	mlarson@meeker.coop	Meeker Coop Light & Power Assn		1725 Highway 12 E Ste 100 Litchfield MN, 55355 United States	Electronic Service		No	M-25-140
151	Burnell	Lauer	blauer.sundial@gmail.com	Sundial Solar		3209 W. 76th St #305 Edina MN, 55435 United States	Electronic Service		No	M-25-140
152	Dean	Leischow	dean@sunrisenrg.com	Sunrise Energy Ventures		315 Manitoba Ave Ste 200 Wayzata MN, 55391 United States	Electronic Service		No	M-25-140
153	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	M-25-140
154	Benjamin	Levine	blevine@mnpower.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	M-25-140
155	Becky	Li	bli@rmi.org			17 State St 25th floor unit 2500 New York NY, 10004 United States	Electronic Service		No	M-25-140
156	Amy	Liberkowski	amy.a.liberkowski@xcelenergy.com	Xcel Energy		414 Nicollet Mall 7th Floor Minneapolis MN, 55401-1993 United States	Electronic Service		No	M-25-140

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
157	Carl	Linvill	clinvill@raponline.org			50 State Street Suite #3 Montpelier VT, 05602 United States	Electronic Service		No	M-25-140
158	Phillip	Lipetsky	greenenergyproductsllc@gmail.com	Green Energy Products		PO Box 108 Springfield MN, 56087 United States	Electronic Service		No	M-25-140
159	Jody	Londo	jody.l.londo@xcelenergy.com	Xcel Energy		414 Nicillet Mall 7th Floor Minneapolis MN, 55401-1993 United States	Electronic Service		No	M-25-140
160	Susan	Ludwig	sludwig@mnpower.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	M-25-140
161	Brian	Lydic	brian@irecusa.org	Interstate Renewable Energy Council, Inc.		PO Box 1156 Latham NY, 12110-1156 United States	Electronic Service		No	M-25-140
162	Madeline	Lydon	madeline.k.lydon@xcelenergy.com	Xcel Energy		401 NICOLLET MALL Floor 7 Minneapolis MN, 55401 United States	Electronic Service		No	M-25-140
163	Richard	Macke	macker@powersystem.org	Power System Engineering, Inc.		10710 Town Square Dr NE Ste 201 Minneapolis MN, 55449 United States	Electronic Service		No	M-25-140
164	Alice	Madden	alice@communitypowermn.org	Community Power		2720 E 22nd St Minneapolis MN, 55406 United States	Electronic Service		No	M-25-140
165	Alex	Magerko	amagerko@epri.com	EPRI		942 Corridor Park Blvd Knoxville TN, 37932 United States	Electronic Service		No	M-25-140
166	Kavita	Maini	kmaini@wi.rr.com	KM Energy Consulting, LLC		961 N Lost Woods Rd Oconomowoc WI, 53066 United States	Electronic Service		No	M-25-140
167	Tom	Mammen	thomas.j.mammen@xcelenergy.com	Xcel Energy		null null, null United States	Electronic Service		No	M-25-140
168	Discovery	Manager	discoverymanager@mnpower.com	Minnesota Power		30 W Superior St Duluth MN, 55802 United States	Electronic Service		No	M-25-140
169	Christine	Marquis	regulatory.records@xcelenergy.com	Xcel Energy		414 Nicollet Mall MN1180-07-MCA Minneapolis MN, 55401 United States	Electronic Service		No	M-25-140
170	Gregg	Mast	gmast@cleanenergyeconomymn.org	Clean Energy Economy Minnesota		4808 10th Avenue S Minneapolis MN, 55417 United States	Electronic Service		No	M-25-140
171	Erica	McConnell	emcconnell@elpc.org	Environmental Law & Policy Center		35 E. Wacker Drive, Suite 1600	Electronic Service		No	M-25-140

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						Chicago IL, 60601 United States				
172	Jess	McCullough	jmccullough@mnpower.com	Minnesota Power		30 W Superior St Duluth MN, 55802 United States	Electronic Service		No	M-25-140
173	Sara G	McGrane	smcgrane@felhaber.com	Felhaber Larson		220 S 6th St Ste 2200 Minneapolis MN, 55420 United States	Electronic Service		No	M-25-140
174	Natalie	McIntire	natalie.mcintire@gmail.com	Wind on the Wires		570 Asbury St Ste 201 Saint Paul MN, 55104-1850 United States	Electronic Service		No	M-25-140
175	Matthew	Melewski	matthew@theboutiquefirm.com	Nokomis Energy LLC & Ole Solar LLC		2639 Nicollet Ave Ste 200 Minneapolis MN, 55408 United States	Electronic Service		No	M-25-140
176	Thomas	Melone	thomas.melone@allcous.com	Minnesota Go Solar LLC		222 South 9th Street Suite 1600 Minneapolis MN, 55120 United States	Electronic Service		No	M-25-140
177	Michael	Menzel	mike.m@sagiliti.com	Sagiliti		23505 Smithtown Rd. Suite 280 Excelsior MN, 55331 United States	Electronic Service		No	M-25-140
178	Tim	Mergen	tmergen@meeker.coop	Meeker Cooperative Light And Power		1725 US Hwy 12 E. Suite 100 PO Box 68 Litchfield MN, 55355 United States	Electronic Service		No	M-25-140
179	Pontius	Mike	mpontius@mnpower.com			null null, null United States	Electronic Service		No	M-25-140
180	Brian	Millberg	fwengineering@comcast.net			695 Grand AVe #222 Saint Paul MN, 55105 United States	Electronic Service		No	M-25-140
181	Luther	Miller	luther.c.miller@xcelenergy.com	Xcel Energy		null null, null United States	Electronic Service		No	M-25-140
182	Marc	Miller	mmiller@soltage.com	Soltage, LLC		66 York Street, 5th Floor Jersey City NJ, 07302 United States	Electronic Service		No	M-25-140
183	Marcus	Mills	marcus@communitypowermn.org	Community Power		2720 E 22nd St Minneapolis MN, 55406 United States	Electronic Service		No	M-25-140
184	Darrick	Moe	darrick@mrea.org	Minnesota Rural Electric Association		11640 73rd Ave N Maple Grove MN, 55369 United States	Electronic Service		No	M-25-140
185	Dalene	Monsebroten	dalene.monsebroten@nmpagency.com	Northern Municipal Power Agency		123 2nd St W Thief River Falls MN, 56701 United States	Electronic Service		No	M-25-140

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
186	Brian	Monson	brian.t.monson@xcelenergy.com	Xcel Energy		null null, null United States	Electronic Service		No	M-25-140
187	Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP		33 South Sixth St Ste 4200 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-140
188	Susan	Mudd	smudd@elpc.org	Environmental Law and Policy Center		35 E. Wacker Drive, Suite 1600 Chicago IL, 60601 United States	Electronic Service		No	M-25-140
189	Pouya	Najmaie	najm0001@gmail.com	Cooperative Energy Futures		3416 16th Ave S Minneapolis MN, 55407 United States	Electronic Service		No	M-25-140
190	Alex	Nelson	anelson@dakotaelectric.com	Dakota Electric Association		4300 220nd St Farmington MN, 55024 United States	Electronic Service		No	M-25-140
191	Anthony	Nelson	amnelson@otpco.com	Ottertail Power		53233 Sunrise Ln Park Rapids MN, 56470 United States	Electronic Service		No	M-25-140
192	Ben	Nelson	benn@cmpasgroup.org	CMMPA		459 South Grove Street Blue Earth MN, 56013 United States	Electronic Service		No	M-25-140
193	Carl	Nelson	cnelson@mncee.org	Center for Energy and Environment		212 3rd Ave N Ste 560 Minneapolis MN, 55401 United States	Electronic Service		No	M-25-140
194	Darin	Nelson	dnelson@minnetonkamn.gov	City of Minnetonka		14600 Minnetonka Blvd Minnetonka MN, 55345 United States	Electronic Service		No	M-25-140
195	David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency		220 South Sixth Street Suite 1300 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-140
196	Sephra	Ninow	sephra.ninow@energycenter.org	Center for Sustainable Energy		426 17th Street, Suite 700 Oakland CA, 94612 United States	Electronic Service		No	M-25-140
197	Michael	Noble	noble@fresh-energy.org	Fresh Energy		408 Saint Peter St Ste 350 Saint Paul MN, 55102 United States	Electronic Service		No	M-25-140
198	Rolf	Nordstrom	rnordstrom@gpisd.net	Great Plains Institute		2801 21ST AVE S STE 220 Minneapolis MN, 55407-1229 United States	Electronic Service		No	M-25-140
199	Samantha	Norris	samanthanorris@alliantenergy.com	Interstate Power and Light Company		200 1st Street SE PO Box 351 Cedar Rapids IA, 52406-0351 United States	Electronic Service		No	M-25-140

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
200	David	O'Brien	david.obrien@navigant.com	Navigant Consulting		77 South Bedford St Ste 400 Burlington MA, 01803 United States	Electronic Service		No	M-25-140
201	Logan	O'Grady	logrady@mnseia.org	Minnesota Solar Energy Industries Association		2288 University Ave W St. Paul MN, 55114 United States	Electronic Service		No	M-25-140
202	Patty	O'Keefe	patty.okeefe@sierraclub.org			2525 Emerson Ave S Apt 2 Minneapolis MN, 55405 United States	Electronic Service		No	M-25-140
203	Timothy	O'Leary	toleary@llec.coop	Lyon-Lincoln Electric Cooperative, Inc		P.O. Box 639 Tyler MN, 56178-0639 United States	Electronic Service		No	M-25-140
204	Jeff	O'Neill	jeff.oneill@ci.monticello.mn.us	City of Monticello		505 Walnut Street Suite 1 Monticelllo MN, 55362 United States	Electronic Service		No	M-25-140
205	Matthew	Olsen	molsen@otpco.com	Otter Tail Power Company		215 South Cascade Street Fergus Falls MN, 56537 United States	Electronic Service		No	M-25-140
206	Russell	Olson	rolson@hcpd.com	Heartland Consumers Power District		PO Box 248 Madison SD, 57042-0248 United States	Electronic Service		No	M-25-140
207	Wendi	Olson	wolson@otpco.com	Otter Tail Power Company		215 South Cascade Fergus Falls MN, 56537 United States	Electronic Service		No	M-25-140
208	Carol A.	Overland	overland@legalectric.org	Legalectric - Overland Law Office		1110 West Avenue Red Wing MN, 55066 United States	Electronic Service		No	M-25-140
209	Bethany	Owen	bowen@mnpower.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	M-25-140
210	Cezar	Panait	cezar.panait@state.mn.us		Public Utilities Commission	121 7th Place East Suite 350 St. Paul MN, 55101 United States	Electronic Service		No	M-25-140
211	Dan	Patry	dpatry@sunedison.com	SunEdison		600 Clipper Drive Belmont CA, 94002 United States	Electronic Service		No	M-25-140
212	Jeffrey C	Paulson	jeff.jcplaw@comcast.net	Paulson Law Office, Ltd.		4445 W 77th Street Suite 224 Edina MN, 55435 United States	Electronic Service		No	M-25-140
213	Dean	Pawlowski	dpawlowski@otpco.com	Otter Tail Power Company		PO Box 496 215 S. Cascade St. Fergus Falls MN, 56537-0496 United States	Electronic Service		No	M-25-140

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
214	Susan	Peirce	susan.peirce@state.mn.us		Department of Commerce	85 Seventh Place East St. Paul MN, 55101 United States	Electronic Service		No	M-25-140
215	Mary Beth	Peranteau	mperanteau@fredlaw.com	Fredrikson & Byron, P.A.		44 East Mifflin Street Suite 1000 Madison WI, 53703 United States	Electronic Service		No	M-25-140
216	Jennifer	Peterson	jjpeterson@mnpower.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	M-25-140
217	Wess	Pfaff	wes.pfaff@mrenergy.com			null null, null United States	Electronic Service		No	M-25-140
218	Ryan	Pierce	ryan.m.pierce@xcelenergy.com	Xcel Energy		null null, null United States	Electronic Service		No	M-25-140
219	Morgan	Pitz	morgan.pitz@us-solar.com	US Solar		100 N 6th St #410B Minneapolis MN, 55403 United States	Electronic Service		No	M-25-140
220	Hannah	Polikov	hpolikov@aee.net	Advanced Energy Economy Institute		1000 Vermont Ave, Third Floor Washington DC, 20005 United States	Electronic Service		No	M-25-140
221	Crystal	Pomerleau	crystal.r.pomerleau@xcelenergy.com	Xcel		null null, null United States	Electronic Service		No	M-25-140
222	Kristel	Porter	kristel@mnrenewablenow.org	MN Renewable Now		null null, null United States	Electronic Service		No	M-25-140
223	Paula	Prahl	paula.prahl@dominiuminc.com	Dominium		2905 Northwest Blvd Ste 150 Plymouth MN, 55441 United States	Electronic Service		No	M-25-140
224	Kevin	Pranis	kpranis@liunagroc.com	Laborers' District Council of MN and ND		81 E Little Canada Road St. Paul MN, 55117 United States	Electronic Service		No	M-25-140
225	Matt	Privratsky	matt@nokomisenergy.com	Nokomis Energy		2639 Nicollet Ave Suite 200 Minneapolis MN, 55408 United States	Electronic Service		No	M-25-140
226	Elizabeth	Psihos	elizabeth.psihos@idealenergies.com			null null, null United States	Electronic Service		No	M-25-140
227	Bridget	Rathsack	bridget.rathsack@burnsvillemn.gov	City of Burnsville, MN		100 Civic Center Parkway Burnsville MN, 55337 United States	Electronic Service		No	M-25-140
228	Peter	Reese	preese@sundialsolarenergy.com	Sundial Energy, LLC		3363 Republic Ave Saint Louis Park MN, 55426 United States	Electronic Service		No	M-25-140
229	Generic Notice	Regulatory	regulatory_filing_coordinators@otpco.com	Otter Tail Power Company		215 S. Cascade Street Fergus Falls	Electronic Service		No	M-25-140

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						MN, 56537 United States				
230	John C.	Reinhardt		Laura A. Reinhardt		3552 26th Ave S Minneapolis MN, 55406 United States	Paper Service		No	M-25-140
231	Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	1400 BRM Tower 445 Minnesota St St. Paul MN, 55101-2131 United States	Electronic Service		Yes	M-25-140
232	Kevin	Reuther	kreuther@mncenter.org	MN Center for Environmental Advocacy		26 E Exchange St, Ste 206 St. Paul MN, 55101-1667 United States	Electronic Service		No	M-25-140
233	Micah	Revell	micah.revell@stinson.com	Stinson LLP		50 South Sixth St Ste 2600 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-140
234	Michael	Riewer	mriewer@otpco.com	Otter Tail Power Company		PO Box 4496 Fergus Falls MN, 56538-0496 United States	Electronic Service		No	M-25-140
235	Jonathan	Roberts	jroberts@soltage.com	Soltage		66 York St 5th Floor Jersey City NJ, 07302 United States	Electronic Service		No	M-25-140
236	Noah	Roberts	nroberts@cleanpower.org	Energy Storage Association		1155 15th St NW, Ste 500 Washington DC, 20005 United States	Electronic Service		No	M-25-140
237	Kristi	Robinson	krobinson@star-energy.com	STAR Energy Services, LLC		1401 South Broadway Pelican Rapids MN, 56572 United States	Electronic Service		No	M-25-140
238	Daniel	Rogers	dan@nokomispartners.com			2639 Nicollet Ave Ste 200 Minneapolis MN, 55408 United States	Electronic Service		No	M-25-140
239	Michael	Ruiz	michael.ruiz@xcelenergy.com	Xcel Energy		null null, null United States	Electronic Service		No	M-25-140
240	Nathaniel	Runke	nrunke@local49.org			611 28th St. NW Rochester MN, 55901 United States	Electronic Service		No	M-25-140
241	Darla	Ruschen	d.ruschen@bcrea.coop	Brown County Rural Electrical Association		PO Box 529 24386 State Highway 4 Sleepy Eye MN, 56085 United States	Electronic Service		No	M-25-140
242	Delaney	Russell	delaney@mnipl.org	Just Solar Coalition		4407 E Lake Street Minneapolis MN, 55407 United States	Electronic Service		No	M-25-140
243	Kwadwo	Safo	ksafo@dakotaelectric.com	Dakota Electric Association		null null, null United States	Electronic Service		No	M-25-140

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
244	Robert K.	Sahr	bsahr@eastriver.coop	East River Electric Power Cooperative		P.O. Box 227 Madison SD, 57042 United States	Electronic Service		No	M-25-140
245	Ian	SantosMeeker	ians@ips-solar.com	IPS Solar		null null, null United States	Electronic Service		No	M-25-140
246	Joseph L	Sathe	jsathe@kennedy-graven.com	Kennedy & Graven, Chartered		150 S 5th St Ste 700 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-140
247	Kenric	Scheevel	kjs@dairynet.com	Dairyland Power Cooperative		3200 East Ave S PO Box 817 La Crosse WI, 54602 United States	Electronic Service		No	M-25-140
248	Dean	Schiro	dean.e.schiro@xcelenergy.com	Xcel Energy		null null, null United States	Electronic Service		No	M-25-140
249	Jacob J.	Schlesinger	jschlesinger@keyesfox.com	Keyes & Fox LLP		1580 Lincoln St Ste 880 Denver CO, 80203 United States	Electronic Service		No	M-25-140
250	Jeff	Schoenecker	jschoenecker@dakotaelectric.com	Dakota Electric Association		4300 220th Street W Farmington MN, 55024 United States	Electronic Service		No	M-25-140
251	Peter	Scholtz	peter.scholtz@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	Suite 1400 445 Minnesota Street St. Paul MN, 55101-2131 United States	Electronic Service		No	M-25-140
252	Kay	Schraeder	kschraeder@minnkota.com	Minnkota Power		5301 32nd Ave S Grand Forks ND, 58201 United States	Electronic Service		No	M-25-140
253	Matthew	Schuerger	matthew.schuerger@state.mn.us		Public Utilities Commission	121 7th Place East Suite 350 St. Paul MN, 55101 United States	Electronic Service		No	M-25-140
254	Ronald J.	Schwartau	rschwartau@noblesce.com	Nobles Electric Cooperative		22636 U.S. Hwy. 59 Worthington MN, 56187 United States	Electronic Service		No	M-25-140
255	Rob	Scott Hovland	rob.scott-hovland@mrenergy.com	Missouri River Energy Services		3724 W Avera Dr PO Box 88920 Sioux Falls SD, 57109-8920 United States	Electronic Service		No	M-25-140
256	Emma	Searson	esearson@solarunitedneighbors.org	Solar United Neighbors		646 S Barrington Ave Apt 101 Los Angeles CA, 90049 United States	Electronic Service		No	M-25-140
257	Dean	Sedgwick	sedgwick@itascapower.com	Itasca Power Company		PO Box 455 Spring Lake MN, 56680 United States	Electronic Service		No	M-25-140
258	Maria	Seidler	maria.seidler@dom.com	Dominion Energy Technology		120 Tredegar Street Richmond VA, 23219 United States	Electronic Service		No	M-25-140

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
259	David	Shaffer	david.shaffer@novelenergy.biz	Novel Energy Solutions		2303 Wycliff St Ste 300 St. Paul MN, 55114 United States	Electronic Service		No	M-25-140
260	Patricia	Sharkey	psharkey@environmentallawcounsel.com	Midwest Cogeneration Association.		180 N LaSalle St Ste 3700 Chicago IL, 60601 United States	Electronic Service		No	M-25-140
261	Christopher L.	Sherman	csherman@sherman-associates.com	Solar Holdings LLC		233 Park Ave S Ste 201 Minneapolis MN, 55415 United States	Electronic Service		No	M-25-140
262	Doug	Shoemaker	dougs@charter.net	Minnesota Renewable Energy		2928 5th Ave S Minneapolis MN, 55408 United States	Electronic Service		No	M-25-140
263	Felicia	Skaggs	fskaggs@meeker.coop	Meeker Cooperative Light & Power		1725 US Highway 12 E Suite 100 Litchfield MN, 55355 United States	Electronic Service		No	M-25-140
264	Glen	Skarbakka	glen@s-pllc.com	Skarbakka PLLC		5411 Bartlett Blvd Mound MN, 55364 United States	Electronic Service		No	M-25-140
265	Anne	Smart	anne.smart@chargepoint.com	ChargePoint, Inc.		254 E Hacienda Ave Campbell CA, 95008 United States	Electronic Service		No	M-25-140
266	Joshua	Smith	joshua.smith@sierraclub.org			85 Second St FL 2 San Francisco CA, 94105 United States	Electronic Service		No	M-25-140
267	Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.		76 W Kellogg Blvd St. Paul MN, 55102 United States	Electronic Service		No	M-25-140
268	Trevor	Smith	trevor.smith@avantenergy.com	Avant Energy, Inc.		220 South Sixth Street Suite 1300 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-140
269	Rafi	Sohail	rafi.sohail@centerpointenergy.com	CenterPoint Energy		800 LaSalle Avenue P.O. Box 59038 Minneapolis MN, 55459-0038 United States	Electronic Service		No	M-25-140
270	Beth	Soholt	bsoholt@cleangridalliance.org	Clean Grid Alliance		570 Asbury Street Suite 201 St. Paul MN, 55104 United States	Electronic Service		No	M-25-140
271	Marcia	Solie	m.solie@bcrea.coop	Brown County Rural Electrical Association		24386 State Hwy. 4, PO Box 529 Sleepy Eye MN, 56085 United States	Electronic Service		No	M-25-140
272	Braden	Solum	braden.solum@idealenergies.com	iDEAL Energies		5810 Nicollet Ave Minneapolis MN, 55419 United States	Electronic Service		No	M-25-140

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
273	Karl	Sonneman	karl17@hbci.com	Law Office of Karl W. Sonneman		111 Riverfront Suite 202 Winona MN, 55987 United States	Electronic Service		No	M-25-140
274	Brandon	Stamp	brandon.j.stamp@xcelenergy.com	Xcel Energy		401 Nicollet Mall Minneapolis MN, 55401 United States	Electronic Service		No	M-25-140
275	Sky	Stanfield	stanfield@smwlaw.com	Shute, Mihaly & Weinberger		396 Hayes Street San Francisco CA, 94102 United States	Electronic Service		No	M-25-140
276	Russ	Stark	russ.stark@ci.stpaul.mn.us	City of St. Paul		Mayor's Office 15 W. Kellogg Blvd., Suite 390 Saint Paul MN, 55102 United States	Electronic Service		No	M-25-140
277	Byron E.	Starns	byron.starns@stinson.com	STINSON LLP		50 S 6th St Ste 2600 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-140
278	Kristin	Stastny	kstastny@taftlaw.com	Taft Stettinius & Hollister LLP		2200 IDS Center 80 South 8th Street Minneapolis MN, 55402 United States	Electronic Service		No	M-25-140
279	Lindsey	Stegall	lindsey.stegall@evgo.com	EVgo Services, LLC		11835 W Olympic Blvd Ste 900E Los Angeles CA, 90064 United States	Electronic Service		No	M-25-140
280	Cary	Stephenson	cstephenson@otpco.com	Otter Tail Power Company		215 South Cascade Street Fergus Falls MN, 56537 United States	Electronic Service		No	M-25-140
281	Chad	Stevenson	chad.stevenson@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	445 Minnesota St. Suite 1400 St. Paul MN, 55101 United States	Electronic Service		No	M-25-140
282	Tammy	Sundbom	tsundbom@mnpower.com	Minnesota Power		null null, null United States	Electronic Service		No	M-25-140
283	Sherry	Swanson	sswanson@noblesce.com	Nobles Cooperative Electric		PO Box 58 Slayton MN, 56172 United States	Electronic Service		No	M-25-140
284	Boratha	Tan	btan@votesolar.org	Vote Solar		null null, null United States	Electronic Service		No	M-25-140
285	Bryant	Tauer	btauer@whe.org	Wright-Hennepin		6800 Electric Dr Rockford MN, 55373 United States	Electronic Service		No	M-25-140
286	Dean	Taylor	dtaylor@pluginamerica.org	Plug In America		6380 Wilshire Blvd, Suite 1000 Los Angeles CA, 90048 United States	Electronic Service		No	M-25-140
287	Whitney	Terrill	whitney@mnipl.org	Minnesota Interfaith Power & Light		null null, null United States	Electronic Service		No	M-25-140

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
288	Daniel	Tikk	daniel.tikk@state.mn.us		Department of Commerce	85 7th Place East Suite 280 Saint Paul MN, 55101 United States	Electronic Service		No	M-25-140
289	Kate	Tohme	ktohme@newleafenergy.com	New Leaf Energy		null null, null United States	Electronic Service		No	M-25-140
290	Stuart	Tommerdahl	stommerdahl@otpco.com	Otter Tail Power Company		215 S Cascade St PO Box 496 Fergus Falls MN, 56537 United States	Electronic Service		No	M-25-140
291	Taige	Tople	taige.d.tople@xcelenergy.com	Northern States Power Company dba Xcel Energy-Elec		414 Nicollet Mall 401 7th Floor Minneapolis MN, 55401 United States	Electronic Service		No	M-25-140
292	Jason	Topp	jason.topp@lumen.com	Qwest Communications Company, LLC.		200 S 5th St Ste 2200 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-140
293	Emma Marshall	Torres	emarshall-torres@convergentep.com			null null, null United States	Electronic Service		No	M-25-140
294	Zack	Townsend	zachary.townsend@brookfieldrenewable.com	Brookfield Renewable		200 Liberty St FL 14 New York NY, 10281 United States	Electronic Service		No	M-25-140
295	Pat	Treseler	pat.jcplaw@comcast.net	Paulson Law Office LTD		4445 W 77th Street Suite 224 Edina MN, 55435 United States	Electronic Service		No	M-25-140
296	Jeff	Triplett	triplettj@powersystem.org	MREA		10710 Town Square Dr NW St 201 Minneapolis MN, 55449 United States	Electronic Service		No	M-25-140
297	Adam	Tromblay	atromblay@noblesce.com	Nobles Cooperative Electric		P.O. Box 58 Slayton MN, 56127-0058 United States	Electronic Service		No	M-25-140
298	Lise	Trudeau	lise.trudeau@state.mn.us		Department of Commerce	85 7th Place East Suite 500 Saint Paul MN, 55101 United States	Electronic Service		No	M-25-140
299	Alan	Urban	alan.m.urban@xcelenergy.com	Xcel Energy		null null, null United States	Electronic Service		No	M-25-140
300	Matt	Van Arkel	mvanarkel@newleafenergy.com			55 Technology Drive Suite 102 Lowell MA, 01851 United States	Electronic Service		No	M-25-140
301	Gary	Van Winkle	gvanwinkle@mylegalaid.org	Mid-Minnesota Legal Aid		111 N Fifth St Ste 100 Minneapolis MN, 55403 United States	Electronic Service		No	M-25-140
302	John	Vaughn	nik@rreal.org	Rural Renewable Energy Alliance		3963 8th Street SW Backus MN, 55435 United States	Electronic Service		No	M-25-140

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
303	Ellen	Veazey	lveazey@solarunitedneighbors.org	Solar United Neighbors		1350 Connecticut Ave NW Ste 412 Washington DC, 20036 United States	Electronic Service		No	M-25-140
304	Sam	Villella	sdvillella@gmail.com			10534 Alamo Street NE Blaine MN, 55449 United States	Electronic Service		No	M-25-140
305	Curt	Volkmann	curt@newenergy-advisors.com	Fresh Energy		408 St Peter St Saint Paul MN, 55102 United States	Electronic Service		No	M-25-140
306	Wendy	Vorasane	wendy.vorasane@idealenergies.com			null null, null United States	Electronic Service		No	M-25-140
307	Robert J.V.	Vose	rvose@kennedy-graven.com	Kennedy & Graven, Chartered		150 S 5th St Ste 700 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-140
308	Stacy	Wahlund	swahlund@otpco.com	Otter Tail Power Company		215 S. Cascade St Fergus Falls MN, 56537 United States	Electronic Service		No	M-25-140
309	Sarah	Walinga	swalinga@solarcity.com	Energy Freedom Coalition		3055 Clearview Way San Mateo MN, 94402 United States	Electronic Service		No	M-25-140
310	Kevin	Walker	kwalker@beaconinterfaith.org	Beacon Interfaith Housing Collaborative		null null, null United States	Electronic Service		No	M-25-140
311	Roger	Warehime	roger.warehime@owatonnautilities.com	Owatonna Municipal Public Utilities - Gas		208 S Walnut Ave PO BOX 800 Owatonna MN, 55060 United States	Electronic Service		No	M-25-140
312	Jenna	Warmuth	jwarmuth@mnpower.com	Minnesota Power		30 W Superior St Duluth MN, 55802-2093 United States	Electronic Service		No	M-25-140
313	Samantha	Weaver	samantha@communitysolaraccess.org	Coalition for Community Solar Access		1380 Monroe St. Washington DC DC, 20010 United States	Electronic Service		No	M-25-140
314	Elizabeth	Wefel	eawefel@flaherty-hood.com	Missouri River Energy Services		525 Park St Ste 470 Saint Paul MN, 55103 United States	Electronic Service		No	M-25-140
315	Sarah	Whebbe	swhebbe@mnseia.org	MnSEIA		445 Minnesota Street Suite 730 St. Paul MN, 55101 United States	Electronic Service		No	M-25-140
316	Joshua	Williams	joshua@highlandfleets.com	Highland Electric Fleets		200 Cummings Center Suite 273-D Beverly MA, 01915 United States	Electronic Service		No	M-25-140
317	Laurie	Williams	laurie.williams@sierraclub.org	Sierra Club		Environmental Law Program	Electronic Service		No	M-25-140

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						1536 Wynkoop St Ste 200 Denver CO, 80202 United States				
318	John	Williamson	john.williamson@state.mn.us	Minnesota Department of Labor and Industry		443 Lafayette Rd N St. Paul MN, 55155-4341 United States	Electronic Service		No	M-25-140
319	Anthony	Willingham	anthony.willingham@electrifyamerica.com	Electrify America		1950 Opportunity Way Suite 1500 Reston VA, 20190 United States	Electronic Service		No	M-25-140
320	Danielle	Winner	danielle.winner@state.mn.us		Department of Commerce	85 7th Place East Suite 500 Saint Paul MN, 55101 United States	Electronic Service		No	M-25-140
321	Heidi	Winter	hwinter@co.murray.mn.us	Murray County		2500 28th Street PO Box 57 Slayton MN, 56172 United States	Electronic Service		No	M-25-140
322	Robyn	Woeste	robynwoeste@alliantenergy.com	Interstate Power and Light Company		200 First St SE Cedar Rapids IA, 52401 United States	Electronic Service		No	M-25-140
323	Terry	Wolf	terry.wolf@mrenergy.com	Missouri River Energy Services		3724 W Avera Dr PO Box Sioux Falls SD, 57109-8920 United States	Electronic Service		No	M-25-140
324	Curtis	Zaun	curtis@cpzlaw.com			3254 Rice Street Little Canada MN, 55126 United States	Electronic Service		No	M-25-140
325	Brian	Zavesky	brianz@mrenergy.com	Missouri River Energy Services		3724 West Avera Drive P.O. Box 88920 Sioux Falls SD, 57108-8920 United States	Electronic Service		No	M-25-140
326	Christopher	Zibart	czibart@atcllc.com	American Transmission Company LLC		W234 N2000 Ridgeview Pkwy Court Waukesha WI, 53188-1022 United States	Electronic Service		No	M-25-140
327	Kurt	Zimmerman	kwz@ibew160.org	Local Union #160, IBEW		2909 Anthony Ln St Anthony Village MN, 55418-3238 United States	Electronic Service		No	M-25-140
328	Emily	Ziring	eziring@stlouispark.org	City of St. Louis Park		5005 Minnetonka Blvd St. Louis Park MN, 55416 United States	Electronic Service		No	M-25-140
329	Ari	Zwick	ari.zwick@state.mn.us		Department of Commerce	85 7th Place East Suite 280 Saint Paul MN, 55101 United States	Electronic Service		No	M-25-140

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