

February 24, 2025

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

RE: Comments of the Minnesota Department of Commerce  
Docket No. E017/M-23-338

Dear Mr. Seuffert:

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

*In the Matter of Commission Consideration and Determination of Otter Tail  
Power Company's Plan to Meet the Small-Scale SES Compliance.*

The Petition was filed by Otter Tail Power Company (OTP or the Company) on December 18, 2024.

The Department recommends approval 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

RW/LN/ar



## Before the Minnesota Public Utilities Commission

### Comments of the Minnesota Department of Commerce

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Docket No. E017/M-23-338

#### I. INTRODUCTION

In 2024, OTP requested, and the Commission approved OTP to construct, operate and own fifteen small-scale solar arrays.<sup>1</sup> OTP has completed construction of all fifteen arrays.<sup>2</sup> To continue toward full compliance with Minnesota's Solar Energy Standard's small-scale requirement, OTP petitions to construct, operate and own an additional fifteen small solar arrays.<sup>3</sup> In addition, OTP requests Commission approval of a Customer Hosted Solar program that will allow OTP to build and own up to forty small-scale solar systems on customer property in the 10-year period from 2026 through 2035. OTP contends that the Customer Hosted Solar program is attracting increased customer interest. OTP proposes to allocate all costs and output of both the additional fifteen projects needed for SES compliance, and the additional forty Customer Hosted Solar projects to Minnesota through the Renewable Cost Recovery Rider.<sup>4</sup>

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<sup>1</sup> *In the Matter of Commission Consideration and Determination of Otter Tail Power Company's Plan to Meet the Small-Scale SES Compliance*, Order, January 26, 2024, Docket No. E017/M-23-338, (eDockets) [20241-202736-01](#), (hereinafter "2024 Commission Order").

<sup>2</sup> Otter Tail Power Company, Compliance Filing, Docket No. E017/M-23-338, June 27, 2024, (eDockets) [20246-207995-01](#) (hereinafter "2024 OTP Compliance Filing").

<sup>3</sup> Otter Tail Power Company, Petition, December 18, 2024, Docket No. E017/M-23-338, (eDockets) [202412-213167-02](#), (hereinafter "Petition"), at Summary of Filing.

<sup>4</sup> *Id.*

## II. PROCEDURAL BACKGROUND

April 3, 2023	In Commission Order E999/PR-22-12, the Commission finds that all utilities are in compliance with the RES, but that OTP is not in compliance with the small-scale solar carve out and permits it to file a petition. <sup>5</sup>
July 19, 2023	OTP submits a small-scale solar plan to the Commission to meet small-scale solar energy standard requirements. <sup>6</sup>
January 26, 2024	The Commission approved OTP's plan to achieve small-scale solar SES compliance prioritizing POP solar and Company owned projects. <sup>7</sup>
June 27, 2024	OTP submits its solar energy standard compliance plan status update. <sup>8</sup>
December 18, 2024	OTP requests approval for construction of fifteen additional small-solar arrays, through a Customer Hosted Solar program. <sup>9</sup>
January 23, 2025	The Commission issues a Notice for Comment Period about OTP's plan to achieve SES compliance. <sup>10</sup>

## III. TOPICS OPEN FOR COMMENT:

- Should the Commission approve Otter Tail's plan to achieve future SES compliance with the small-scale solar carve-out requirement, including Otter Tail's investment in up to fifteen Otter Tail-owned solar projects under 40 kilowatts?
- Should the Commission approve Otter Tail's plan to create a customer program, called Customer Hosted Solar, which allows the Company to build, operate and own up to forty small-scale systems placed only on customer property constructed during a ten-year period from 2026 through 2035?

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<sup>5</sup> *In the Matter of Commission Consideration and Determination of Compliance with Renewable Energy Standards for Year 2021, Order Finding Compliance, in Part, and Requiring Filing*, April 3, 2023, Docket No. E-999/PR-22-12 (eDockets) [20234-194460-02](#).

<sup>6</sup> Otter Tail Power Company, Initial Filing, July 19, 2023, Docket No. E017/M-23-338, (eDockets) [20237-197594-01](#) (hereinafter "OTP Compliance Plan").

<sup>7</sup> 2024 Commission Order.

<sup>8</sup> 2024 OTP Compliance Filing.

<sup>9</sup> Petition.

<sup>10</sup> Notice for Comment, January 23, 2025, Docket No. E017/M-23-338, (eDockets) [20251-214314-01](#).

- Should the Commission approve Otter Tail's request to authorize future cost recovery of the Company-owned small solar projects through the Renewable Resource Cost Recovery rider, as described in the plan?
- Are there other issues or concerns related to this matter?

#### **IV. DEPARTMENT ANALYSIS**

##### **A. SES SMALL-SCALE SOLAR COMPLIANCE**

The Department responds to the following notice topic:

*Should the Commission approve Otter Tail's plan to achieve future SES compliance with the small-scale solar carve-out requirement, including Otter Tail's investment in up to fifteen Otter Tail-owned solar projects under 40 kilowatts?*

On January 26, 2024, Commission Order specified at Order Point 3 that Otter Tail Power shall defer the Minnesota SES small-scale solar compliance requirement and carry forward any outstanding obligation for up to three years.<sup>11</sup> With the addition of the fifteen Otter Tail Power-owned systems proposed in the present petition, OTP expects to meet compliance in the 2028 or 2029. As shown by the blue line in Chart 2, with the fifteen small-solar arrays, OTP would add approximately 600 kW (fifteen systems at 40 kW each) of solar production that would help meet compliance with OTP's June 1, 2027 RES compliance filing.<sup>12</sup> This plan would accelerate OTP's compliance by approximately two years, from 2028 to 2026.<sup>13</sup>

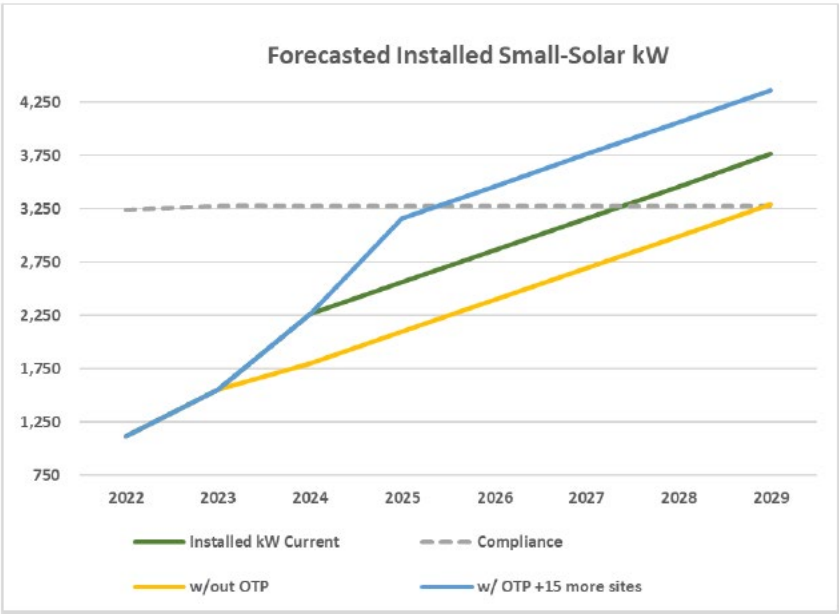
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<sup>11</sup> 2024 Commission Order, at Order Point 3.

<sup>12</sup> Petition, at 7.

<sup>13</sup> Otter Tail Power, Compliance Filing, February 18, 2024, Docket No. E017/M-23-338, (eDockets) [202412-213167-02](#), at 8.

Chart 2: Otter Tail Power Forecasted Installed Small-Solar



Petition Chart 2 at 8.<sup>14</sup>

The Department recommends approval of the construction of the additional fifteen projects but recommends the addition of a cost cap (discussed later in the in the cost recovery section) and a reservation by project type (company-owned, company-sited versus company-owned, customer-sited). The Department believes that the approval of the fifteen company-owned projects is a reasonable approach to provide additional certainty regarding compliance since it removes reliance on customer-led projects that often take more time to materialize.<sup>15</sup> By building these systems itself, Otter Tail Power increases compliance certainty by removing the risk of relying on customers that face the volatility of the solar market and the hassles of interconnecting, maintaining and operating the system—tasks that a consumer is usually not familiar with.<sup>16</sup>

Further, the Department recommends that the Commission require OTP to reserve at least two-thirds of these fifteen projects to be OTP-owned, on OTP land, since this type of project has a significantly better Net Present Value (NPV) than the Customer Sited projects. Both prior and current OTP NPV analyses have shown that company-owned projects have varying cost-effectiveness that depends on siting type. This reservation also allows for one-third of the fifteen projects to be used to address customer interest in company-owned, customer-sited projects as discussed further below.

Table 1: Otter Tail Power’s Small-Solar Net Present Value Calculation

<sup>14</sup> Petition, at 8.

<sup>15</sup> Petition, at 6.

<sup>16</sup> Petition, at 9.

	Small-Solar Solution Analyzed	Net Present Value
1	POP Solar NPV	-\$3,365
2	Otter Tail Owned, on Otter Tail Land NPV	-\$8,137
3	Otter Tail Ownership, Customer Land NPV	-\$17,467
4	Minnesota Power Solar Sense NPV	-\$6,330
5	Xcel Energy Solar Rewards NPV	-\$10,350
6	Purchasing SRECs from Customer or Another Utility NPV	-\$32,821

*OTP's July 19, 2023 Petition Table 3 at 10.<sup>17</sup>*

Therefore, the Department recommends the approval of the fifteen projects. The Department also recommends that the Commission require OTP to reserve at least two-thirds of the fifteen projects to be OTP-owned on OTP land, and the remaining projects, in recognition of customer interest, may be used for OTP owned customer-sited projects.

**B. CUSTOMER HOSTED SOLAR**

The Department responds to the following notice topic:

*Should the Commission approve Otter Tail's plan to create a customer program, called Customer Hosted Solar, which allows the Company to build, operate and own up to forty small-scale systems placed only on customer property constructed during a ten-year period from 2026 through 2035?*

The Department recommends that the Commission deny OTP's Hosted Solar proposal for an additional forty potential solar projects. However, as stated above in recognition of customer interest, the Department recommends the Commission authorize OTP to reserve a portion (about one-third) of the fifteen company-owned projects, if approved, to be sited on customer property.

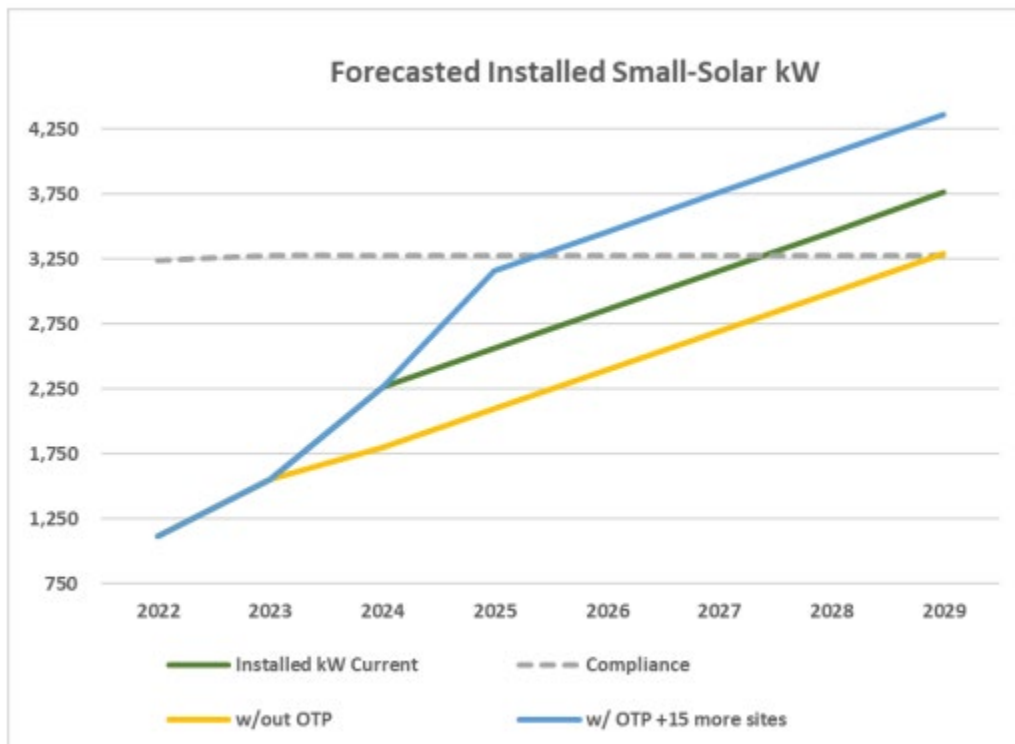
OTP illustrates its compliance with SES under several scenarios with the charts below. OTP's Chart 2 shows the 2029 forecast including the fifteen additional projects proposed to be greater than 4,250 kW versus compliance requirement of roughly 3,250 kW. The chart illustrates the Company will far exceed its requirements without the additional forty Customer Hosted Solar projects.<sup>18</sup> OTP provided Chart 3 in response to a Department Information Request (Attachment 1) that requested OTP's forecasted generation with the additional Customer Hosted Solar projects. Chart 3 illustrates that the Company will far exceed its compliance requirements if it develops the additional forty Customer Hosted Program solar projects over its anticipated 10-year timeline.

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<sup>17</sup> OTP Compliance Plan, at 10.

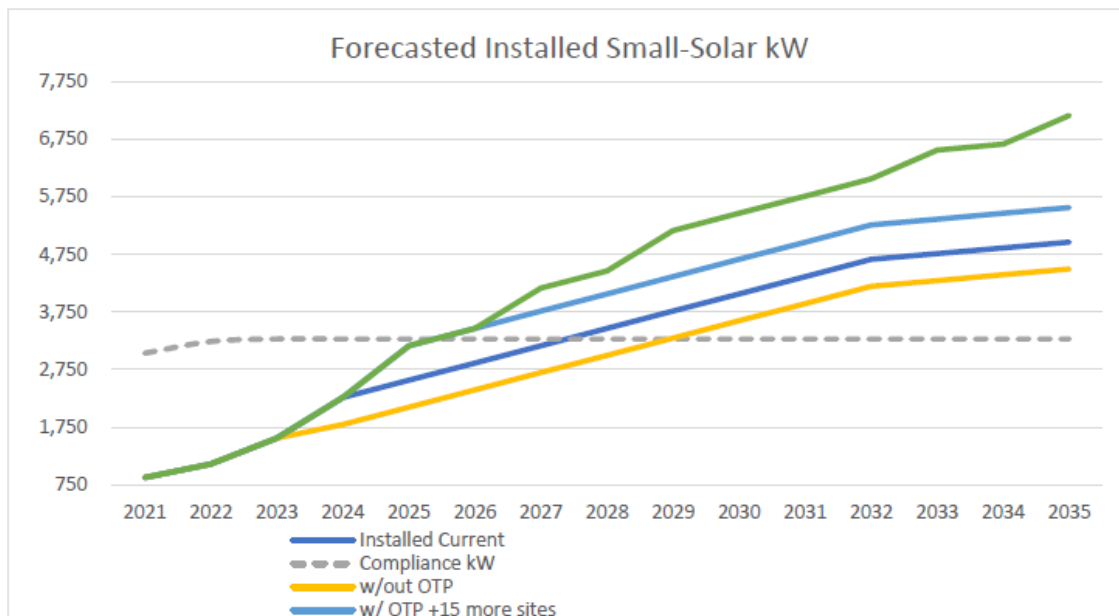
<sup>18</sup> Petition, at 8.

Chart 2: Otter Tail Forecasted Installed Small-Solar kW<sup>19</sup>



*Petition Chart 2 at 8.*<sup>20</sup>

Chart 3: Otter Tail Forecasted Installed Small-Solar kW



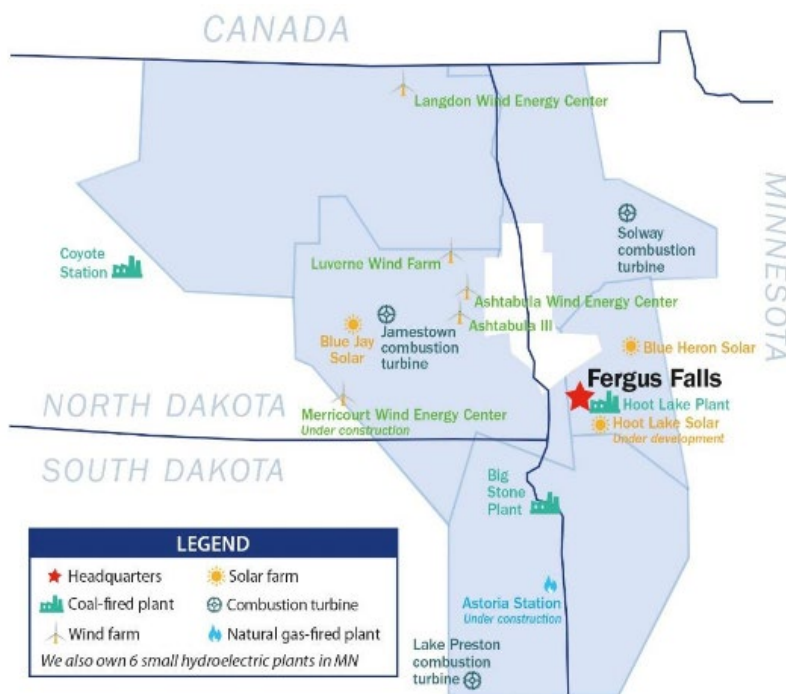
Attachment 1, OTP Response to Information Request MN-DOC-003.

<sup>19</sup> *Id.*

<sup>20</sup> OTP Compliance Plan, at 10.

OTP has reasoned that these projects are necessary because of customer demand for customer-hosted solar projects. OTP attests that customers have identified that it is logistically burdensome to own the solar projects themselves, even if the project is at no cost to the customer.<sup>21</sup> In a response to a Department information request, OTP also cited the potential for significant, rapid load growth occurring on its Minnesota system—such as a new data center in its service area—as evidence for the need of the Customer Hosted Solar projects.<sup>22</sup> The Department is not aware of a large, planned load addition (such as a data center) in the long-term in OTP’s Minnesota territory; and, OTP did not provide additional information in its Petition that would substantiate this claim. OTP’s most recent IRP showed a reduction in load forecast compared to its previous IRP forecast.<sup>23</sup> The majority of anticipated data centers have not been in OTP’s service territory, as demonstrated by Charts A and B. Furthermore, Chart C illustrates that the majority of anticipated data center projects are forecasted for the Twin Cities Metropolitan Area.

Chart A: Otter Tail Power Service Territory



Seeking Alpha<sup>24</sup>

<sup>21</sup> Petition, at 9.

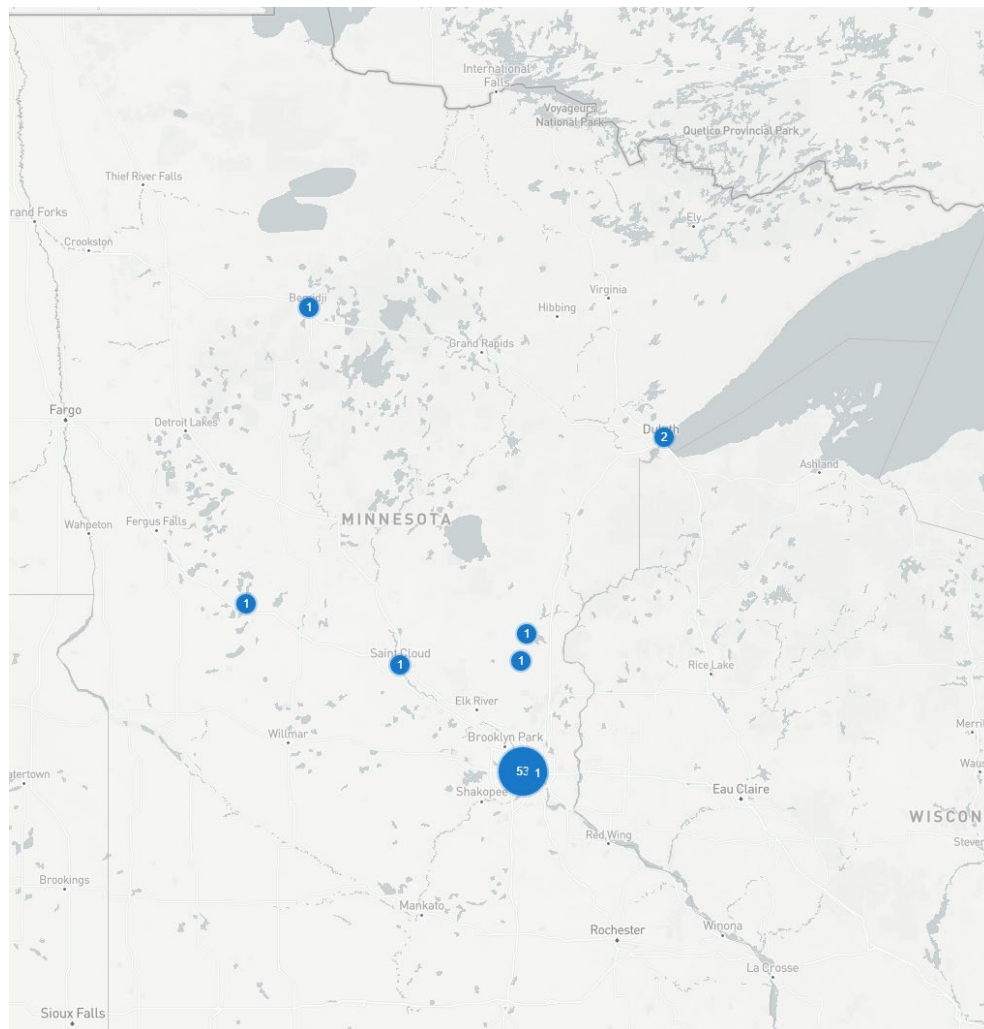
<sup>22</sup> See, Response to Information Request MN-DOC-003 at page 1, “The Company views the Customer Hosted solar option as a service to interested customers and a way to meet long-term small-solar compliance if significant growth, like a data center, were to take service on our Minnesota system.”

<sup>23</sup> *In the Matter of Otter Tail Power Company’s Submittal of its 2022–2036 Integrated Resource Plan*, Otter Tail Power Company, Initial Filing, September 1, 2022, Docket No. E017/RP-21-339, (eDockets) [20219-177654-04](#), at 16.

<sup>24</sup> *Otter Tail Corporation: An Interesting Utility That Could Struggle Despite Its Potential*. Seeking Alpha, (2021). Available at: [Otter Tail Corporation: An Interesting Utility That Could Struggle Despite Its Potential \(NASDAQ:OTTR\) | Seeking Alpha](#).



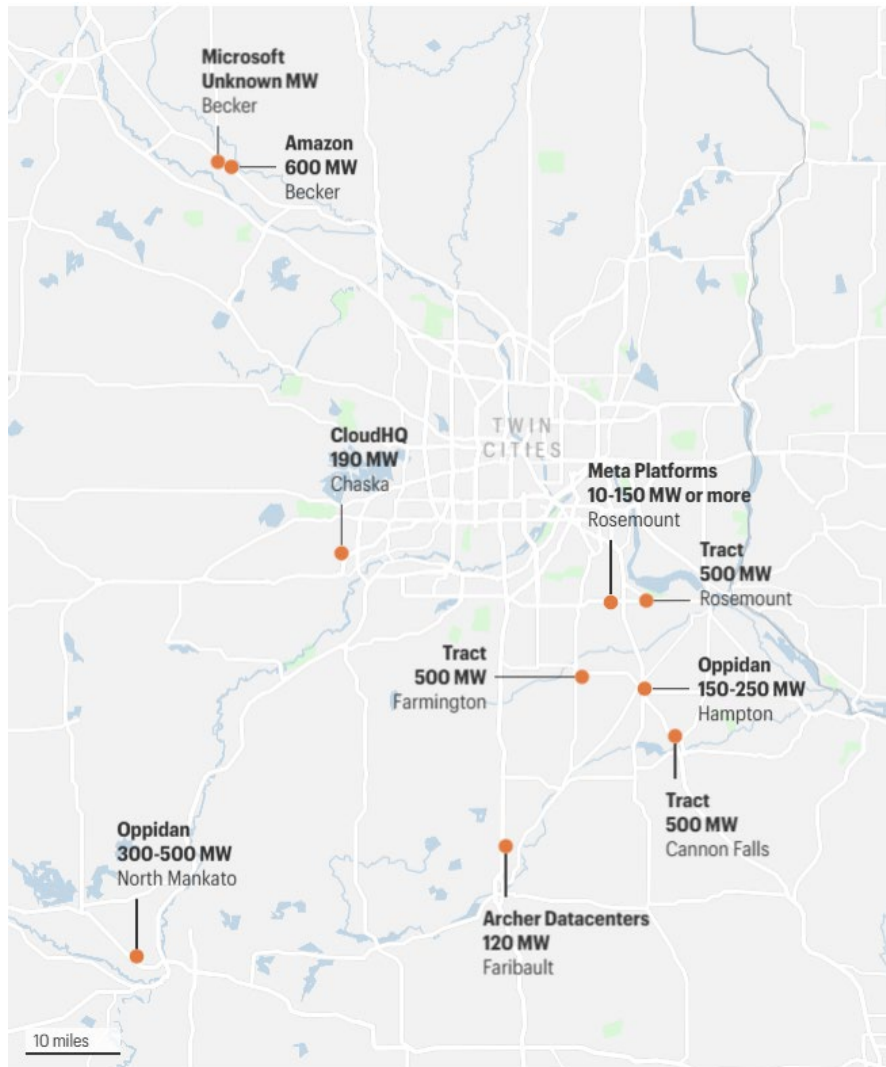
*Chart B: Existing Data Centers in Minnesota*



[Minnesota Data Centers](#)<sup>25</sup>

<sup>25</sup> *Minnesota Data Centers*. Data Center Map. Available at: [Minnesota Data Centers](#).

Chart C: Forecasted Construction of Data Centers



[Minnesota data centers power needs could be staggering](#)<sup>26</sup>

At this time, OTP will surpass its SES obligation with the approval of the additional fifteen projects also proposed in its Petition. The Department concludes it would be premature to permit the construction of another forty projects based on potential load growth absent additional information, a Commission Order, or statutory requirement. The Department recommends the Commission deny OTP's Customer Hosted Solar proposal.

<sup>26</sup> Orenstein, Walker. *Mega data centers are coming to Minnesota. Their power needs are staggering.* Star Tribune, (2025). Available at: [Minnesota data centers power needs could be staggering.](#)

*B.1. Other Project Types*

In its Petition, OTP noted:

In the June 27, 2024 Compliance filing the Company was optimistic that between Minnesota Solar for Schools, Solar on Public Buildings, Otter Tail Power's Publicly Owned Property (POP) Solar program, Inflation Reduction Act Direct Pay, and other organic customer projects, the Company would meet small-solar compliance by 2027. However, the Company has found that all customer projects take much longer to materialize than previously estimated.<sup>27</sup>

If the longer timeline for the construction of these projects was the primary obstacle for these originally planned projects, then it is reasonable to substitute the 10-year Customer Hosted Program with an approach that leverages these higher quality projects. The Minnesota Solar for Schools, Solar on Public Buildings, and Otter Tail Power's Public Owned Property (POP) Solar programs showed a higher NPV and were also rated the highest in based on OTP's comparison of project types and its self-scoring of project quality. In Table 2, these projects ranked the highest in terms of maximizing inclusivity and participation of customers, and providing community benefits, while also having a high ranking in timely meeting of small-SES Compliance, being low-cost to ratepayers, and customer expressed interest.

Table 2: Otter Tail Power Matrix of Small-Scale Solar Solutions

Strategy Solution	Strategy Filter Question					Total
	Timely meets small-SES Compliance?	Maximizes Inclusivity and Participation of Customers	Low-cost to Ratepayers?	Provides community optics and benefits.	Customer Expressed Interest	
POP Solar Maximized through ECO/CIP	4	5	5	5	4	23
Company-owned, on Company property	5	3	3	3	3	17
Company-owned, on Customer Property	3	4	2	3	5	17
Customer-owned with Rebate from Company	2	2	4	1	2	11
Customer-owned without Rebate	1	2	5	1	1	10
Purchase SRECs	3	1	1	1	1	7

OTP's July 19, 2023 Petition Table 2 at 9.

Therefore, if the Commission is interested in approving additional solar within OTP's footprint, the Department concludes that the other project types in OTP's petition (the Minnesota Solar for Schools,

<sup>27</sup> OTP Compliance Plan, at 9

the Solar on Public Buildings, and the Company's Public Owned Property (POP) Solar programs may be the more reasonable option for ratepayers. If the Commission seeks to approve additional solar, above SES compliance, within OTP's service area, then the Department recommends the Commission require OTP to develop and file a plan reevaluating these project types and their potential to meet the needs originally proposed for the Customer Hosted Solar projects.

*C. COST RECOVERY*

The Department responds to the following notice topic:

*Should the Commission approve Otter Tail's request to authorize future cost recovery of the Company-owned small solar projects through the Renewable Resource Cost Recovery rider, as described in the plan?*

OTP seeks Commission approval for all costs and production from the additional fifteen small-scale solar projects and up to forty customer-hosted small-solar projects to be allocated to Minnesota ratepayers through the Renewable Resource Cost Recovery Rider (RRCR). As discussed above, the Department does not recommend approval of the forty customer-hosted small-solar projects at this time. The Department will address the cost recovery of the fifteen small-scale solar projects herein.

*C.1. Renewable Resource Cost Recovery Rider (RRCR)*

Minn. Stat. § 216B.1645, Subd. 2a (a) defines which projects qualify for rider recovery:

A utility may petition the commission to approve a rate schedule that provides for the automatic adjustment of charges to recover prudently incurred investments, expenses, or costs associated with facilities constructed, owned, or operated by a utility to satisfy the requirements of section 216B.1691, provided those facilities were previously approved by the commission under section 216B.2422 or 216B.243, or were determined by the commission to be reasonable and prudent under section 216B.243, subdivision 9. For facilities not subject to review by the commission under section 216B.2422 or 216B.243, a utility shall petition the commission for eligibility for cost recovery under this section prior to requesting cost recovery for the facility.

Minn. Stat. § 216B.1645 Subd. 2a (a) requires a petition to include:

- (1) a description of the facilities for which costs are to be recovered;
- (2) an implementation schedule for the facilities;
- (3) the utility's costs for the facilities;

- (4) a description of the utility's efforts to ensure that costs of the facilities are reasonable and were prudently incurred; and
- (5) a description of the benefits of the project in promoting the development of renewable energy in a manner consistent with this chapter.

Therefore, OTP must petition the Commission for approval under this section as these projects are proposed to satisfy the requirements of Minn. Stat. § 216B.1691 Subd. 2f *Solar Energy Standard* and are not subject to review under Minn. Stat. § 216B.2422 or 216B.243.

### *C.2. Solar Energy Standard*

Minn. Stat. § 216B.1691 Subd. 2f states:

- (a) In addition to the requirements of subdivisions 2a and 2g, each public utility shall generate or procure sufficient electricity generated by solar energy to serve its retail electricity customers in Minnesota so that by the end of 2020, at least 1.5 percent of the utility's total retail electric sales to retail customers in Minnesota is generated by solar energy.
- (b) For a public utility with more than 200,000 retail electric customers, at least ten percent of the 1.5 percent goal must be met by solar energy generated by or procured from solar photovoltaic devices with a nameplate capacity of 40 kilowatts or less.
- (c) A public utility with between 50,000 and 200,000 retail electric customers:
  - (1) must meet at least ten percent of the 1.5 percent goal with solar energy generated by or procured from solar photovoltaic devices with a nameplate capacity of 40 kilowatts or less;

As OTP's planned solar projects are 40 kilowatt or less, the Department concludes the projects qualify for application toward OTP Small Energy Solar obligation under article c.1 of Minn. Stat. § 216B.1691 Subd. 2f.

### *C.3. RRCR and Cost Cap*

Therefore, consistent with prior Commission decision in the present docket, the Department recommends the Commission authorize future cost recovery through OTP's Renewable Resource Cost Recovery Rider, subject to Commission review and approval of specific costs to be presented by OTP in a future petition by OTP under Minn. Stat. § 216.1645, subd. 2a, or in a general rate case.<sup>28</sup>

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<sup>28</sup> 2024 Commission Order, at Order Point 4.

The Department recommends the Commission deny OTP's request for cost recovery tools that include adjustments for inflation, any potential discontinuation of the Investment Tax Credit and a 15-percent contingency.<sup>29</sup> This cost recovery proposal could authorize costs to ratepayers that are materially different than those proposed in this proceeding with the present information available. Instead, the Department recommends the Commission limit OTP cost recovery to a capital cost cap with the total costs recovered set at the costs proposed by OTP in its Petition. The Department also recommends, on the basis of Commission precedent, that the Commission authorize OTP to request Commission approval to exceed the cost cap if it can show that any costs incurred above the cost cap are the result of a government action (e.g. tariff, trade investigation, etc.) that causes meaningful disruption to solar panel supplies and market prices.<sup>30</sup> This recommendation allows for some flexibility, as necessary, but places the burden on the utility to fully justify collecting cost overruns from Minnesota ratepayers.

## V. DEPARTMENT RECOMMENDATIONS

Based on analysis of Otter Tail Power Company's Petition in the *Matter of Commission Consideration and Determination of Otter Tail Power Company's Plan to Meet the Small-Scale SES Compliance* and the information in the record, the Department has prepared recommendations, which are provided below. The recommendations correspond to the subheadings of Section III above.

### D. SES SMALL-SCALE SOLAR COMPLIANCE

- The Department recommends the approval of the fifteen projects.
- The Department recommends that the Commission require OTP to reserve at least two-thirds of the fifteen projects to be OTP owned on OTP land, and the remaining projects, in recognition of customer interest, may be used for OTP owned customer-sited projects.

### E. CUSTOMER HOSTED SOLAR

- The Department recommends the Commission deny OTP's Customer Hosted Solar proposal.
- B.1. If the Commission seeks to approve additional solar within OTP's service area, above SES compliance, the Department recommends the Commission require OTP to develop and file a plan reevaluating these project types and their potential to meet the needs originally proposed for the Customer Hosted Solar projects.

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<sup>29</sup> Petition, at 10

<sup>30</sup> See, *In the Matter of the Petition of Northern States Power Company, d/b/a Xcel Energy, for Approval of Sherco Solar 3 and the Apple River Solar Power Purchase Agreement*, Order, Docket No. E002/M-22-403, October 25, 2023, (eDockets) [202310-199871-01](#), at point 5a.

*F. COST RECOVERY*

- C.3. The Department recommends the Commission authorize future cost recovery through OTP's Renewable Resource Cost Recovery Rider, subject to Commission review and approval of specific costs to be presented in a future petition by OTP under Minn. Stat. § 216.1645, subd. 2a, or in a general rate case.
- C.3. The Department recommends the Commission deny OTP's request for cost recovery protections that include adjustments for inflation, any potential discontinuation of the Investment Tax Credit and a 15 percent contingency.
- C.3. The Department recommends the Commission limit OTP cost recovery to a capital cost cap with the total costs recovered set at the dollar per kilowatt costs proposed by OTP in its Petition.
- C.3. The Department recommends the Commission authorize OTP to request Commission approval to exceed the cost cap if it can show that any costs incurred above the cost cap are the result of a government action (e.g. tariff, trade investigation, etc.) that causes meaningful disruption to solar panel supplies and market prices.

Attachments



OTTER TAIL POWER COMPANY

Docket No: E017-M-23-338

Response to: MN Department of Commerce

Analyst: Daniel Tikk - Rachel Wiedewitsch

Date Received: January 24, 2025

Date Due: February 03, 2025

Date of Response: February 04, 2025

Responding Witness: Jason A. Grenier, Manager Retail Energy Solutions - (218) 739-8639

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Information Request:

Topic: Customer Hosted Solar Program

Reference(s): December 18, 2024 Petition Section VII.

**Request:**

In Section VII of its Petition, OTP requests approval of 40 company-owned and customer-sited projects to be constructed over a ten-year period from 2026-2035. Please provide OTP's forecasted installed small-solar kW relative to its compliance requirements for each year through 2035, assuming the Company's full request was approved by the Commission. Please provide the requested data in a Microsoft Excel executable format (\*.xlsx) with all links and formulae intact.

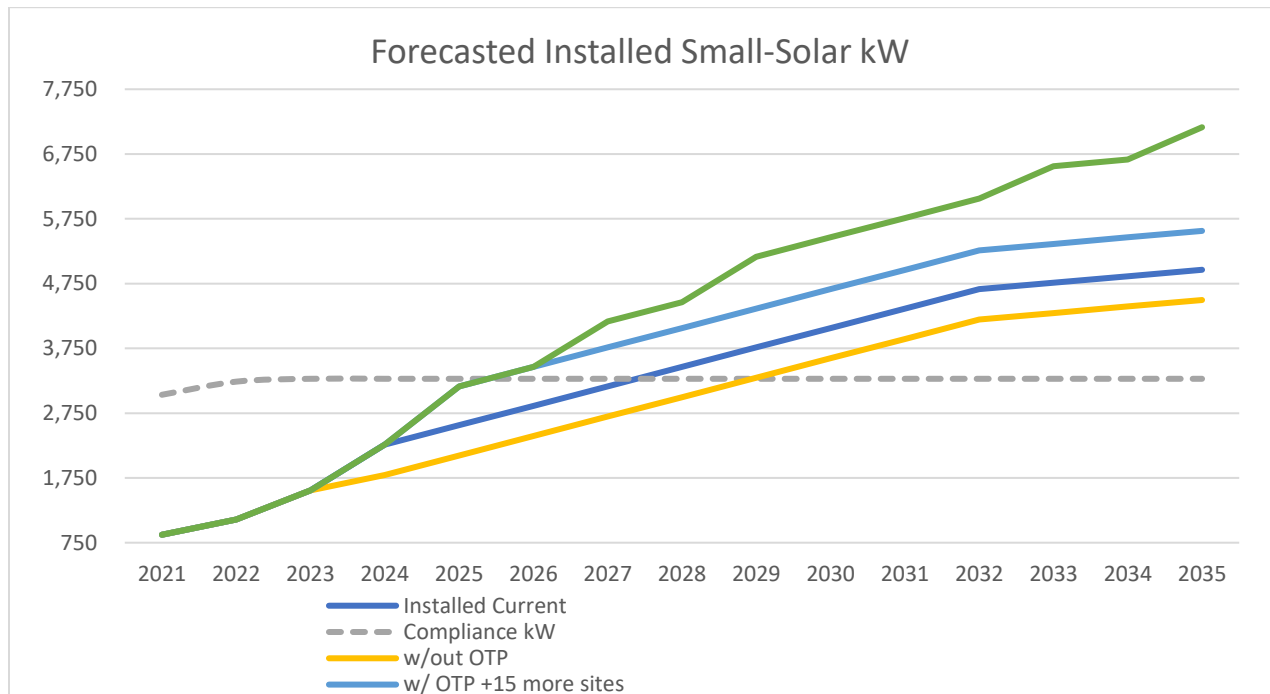
Attachments: 1

Attachment 1 to IR MN-DOC-003.xlsx

Response:

The Company has included Attachment 1 to IR MN-DOC-003, a Microsoft Excel file, as a forecasted installed small solar kW relative to its compliance requirements through 2035. The Forecasted Installed Small-Solar kW chart is below from the analysis is shown below.

The proposed up to forty small-scale solar Customer Hosted projects would be built in groupings to improve cost effectiveness and would either be brought forward or delayed during the ten-year period based on customer demand and forecasted compliance needs. The Company views the Customer Hosted solar option as a service to interested customers and a way to meet long-term small-solar compliance if significant growth, like a data center, were to take service on our Minnesota system.



## **CERTIFICATE OF SERVICE**

I, Sharon Ferguson, hereby certify that I have this day, served copies of the following document on the attached list of persons 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**  
**Comments**

**Docket No. E017/M-23-338**

Dated this **24<sup>th</sup>** day of **February 2025**

**/s/Sharon Ferguson**

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
1	Derek	Bertsch	derek.bertsch@mrenergy.com	Missouri River Energy Services		3724 West Avera Drive PO Box 88920 Sioux Falls SD, 57109-8920 United States	Electronic Service		No	23-338Official
2	Jon	Brekke	jbrekke@grenergy.com	Great River Energy		12300 Elm Creek Boulevard Maple Grove MN, 55369-4718 United States	Electronic Service		No	23-338Official
3	Matthew	Brodin	mbrodin@allete.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	23-338Official
4	Richard	Burud	rgburud@msn.com	Southern Minnesota Energy Cooperative		31110 Cooperative Way Rushford MN, 55971 United States	Electronic Service		No	23-338Official
5	Ray	Choquette	rchoquette@agp.com	Ag Processing Inc.		12700 West Dodge Road PO Box 2047 Omaha NE, 68103-2047 United States	Electronic Service		No	23-338Official
6	Generic	Commerce Attorneys	commerce.attorneys@ag.state.mn.us		Office of the Attorney General - Department of Commerce	445 Minnesota Street Suite 1400 St. Paul MN, 55101 United States	Electronic Service		Yes	23-338Official
7	Curt	Dieren	curt.dieren@dgr.com	L&O Power Cooperative		1302 S Union St Rock Rapids IA, 51246 United States	Electronic Service		No	23-338Official
8	Sharon	Ferguson	sharon.ferguson@state.mn.us		Department of Commerce	85 7th Place E Ste 280 Saint Paul MN, 55101-2198 United States	Electronic Service		No	23-338Official
9	Ronald J.	Franz	ronald.franz@dairylandpower.com	Dairyland Power Cooperative		3200 East Ave S PO Box 817 La Crosse WI, 54602-0817 United States	Electronic Service		No	23-338Official
10	Jessica	Fyhrie	jfyhrie@otpc.com	Otter Tail Power Company		PO Box 496 Fergus Falls MN, 56538-0496 United States	Electronic Service		No	23-338Official
11	Jason	Grenier	jgrenier@otpc.com	Otter Tail Power Company		215 South Cascade Street Fergus Falls MN, 56537 United States	Electronic Service		No	23-338Official
12	Bryce	Haugen	bhaugen@otpc.com	Otter Tail Power Company		215 S Cascade St P.O. Box 496 Fergus Falls MN, 56538 United States	Electronic Service		No	23-338Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
13	Adam	Heinen	aheinen@dakotaelectric.com	Dakota Electric Association		4300 220th St W Farmington MN, 55024 United States	Electronic Service		No	23-338Official
14	Joe	Hoffman	ja.hoffman@smmpa.org	SMMPA		500 First Ave SW Rochester MN, 55902-3303 United States	Electronic Service		No	23-338Official
15	Casey	Jacobson	cjacobson@bepc.com	Basin Electric Power Cooperative		1717 East Interstate Avenue Bismarck ND, 58501 United States	Electronic Service		No	23-338Official
16	Nathan	Jensen	njensen@otpc.com	Otter Tail Power Company		215 S. Cascade St. Fergus Falls MN, 56537 United States	Electronic Service		No	23-338Official
17	Nate	Jones	njones@hcpd.com	Heartland Consumers Power		PO Box 248 Madison SD, 57042 United States	Electronic Service		No	23-338Official
18	Nick	Kaneski	nick.kaneski@enbridge.com	Enbridge Energy Company, Inc.		11 East Superior St Ste 125 Duluth MN, 55802 United States	Electronic Service		No	23-338Official
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25	Ben	Nelson	benn@cmpasgroup.org	CMMPA		459 South Grove Street Blue Earth MN, 56013 United States	Electronic Service		No	23-338Official



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39	Carol	Westergard	cwestergard@otpc.com	Otter Tail Power Company		215 S Cascade St Fergus Falls MN, 56537 United States	Electronic Service		No	23-338Official