## BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

Katie J. Sieben	Chair
Hwikwon Ham	Commissioner
Valerie Means	Commissioner
Joseph K. Sullivan	Commissioner
John A. Tuma	Commissioner

In the Matter of the Joint Application of Northern Crescent Solar LLC for a Site Permit for the 50 MW and a Site Permit for the 150 MW Solar Generation Facility in Faribault County, Minnesota

The above-entitled matter has been considered by the Commission and the following disposition made:

- 1. Accepted the application as substantially complete.
- 2. Requested that the Administrative Law Judge (ALJ) provide a full report with findings of fact, conclusions of law, and recommendations regarding the project following the public hearing.

This decision is issued by the Commission's consent calendar subcommittee, under a delegation of authority granted under Minn. Stat. § 216A.03, subd. 8 (a). Unless a party, a participant, or a Commissioner files an objection to this decision within ten days of receiving it, it will become the Order of the full Commission under Minn. Stat. § 216A.03, subd. 8 (b).

The Commission agrees with and adopts the recommendations of the Department of Commerce, which are attached and hereby incorporated into the Order.



BY ORDER OF THE COMMISSION

William Juffe

Will Seuffert Executive Secretary

To request this document in another format such as large print or audio, call 651.296.0406 (voice). Persons with a hearing or speech impairment may call using their preferred Telecommunications Relay Service or email <u>consumer.puc@state.mn.us</u> for assistance.

August 30, 2024

VIA EDOCKETS

Mr. Will Seuffert Executive Secretary Public Utilities Commission 121 Seventh Place East, Suite 350 Saint Paul, MN 55101-2147

## RE: **Completeness Comments and Recommendations** Northern Crescent Solar and Storage Project Docket Nos. IP-7135/GS-22-57 and IP-7135/ESS-24-238

**Executive Secretary Seuffert:** 

Department of Commerce, Energy Environmental Review and Analysis (EERA) staff provides the attached comments and recommendations in response to the Minnesota Public Utilities Commission's August 16, 2024, *Notice of Comment Period on Application Completeness* for a solar generating site permit and a battery storage system site permit for the up to 150 MW Northern Crescent Solar and Energy Storage Project.

EERA recommends the Commission accept the joint site permit application as substantially complete.

Staff further recommends the Commission request that the ALJ provide a full report with findings of fact, conclusions of law, and recommendations regarding the project following the public hearing, and take no action on an advisory task force.

Staff is available to answer any questions the Commission might have.

Sincerely,

Richard Davis Environmental Review Manager Energy Environmental Review and Analysis

Enclosure

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# **BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION**

# ENERGY ENVIRONMENTAL REVIEW AND ANALYSIS COMMENTS AND RECOMMENDATIONS

## Northern Crescent Solar and Storage Project

Docket Nos. IP-7135/GS-22-57 (Solar Facility Site Permit) and IP-7135/ESS-24-238 (Storage Facility Site Permit)

Date: August 30, 2024Staff: Richard Davis | richard.davis@state.mn.us | (651) 539-1846

In the Matter of the Joint Application of Northern Crescent Solar LLC for a Solar Energy Generating System Site Permit and a Battery Energy Storage System Site Permit for the up to 150 MW Northern Crescent Solar and Storage Project in Faribault County, Minnesota

**Issues Addressed**: These comments and recommendations respond to the Minnesota Public Utilities Commission's August 16, 2024, *Notice of Comment Period on Application Completeness*.

#### **Topics for Comment**

- Does the site permit application contain the information required under Minn. R. 7850.3100?
- Are there any contested issues of fact with respect to the representations made in the application?
- Should an advisory task force be appointed?
- Are there any additional procedural requirements that should be considered (*e.g.*, public hearing process)?
- Should the Commission direct the Executive Secretary to issue an authorization to the applicant to initiate consultation with the Minnesota State Historic Preservation Office (SHPO)?

**Tables**: Table 1 Application Completeness ChecklistTable 2 Hypothetical Process Schedule

## Documents Attached: Project Overview Map

Additional documents and information, can be found on eDockets (<u>https://www.edockets.state.mn.us/EFiling/search.jsp</u>); for the solar facility site permit docket by searching "22" for year and "57" for number; for the storage facility site permit by searching "24" for year and "238" for number. Information can also be found on the EERA webpage: <u>https://eera.web.commerce.state.mn.us/web/project/15706</u>.

To request this document in another format, such as large print or audio, call 651-539-1529. Persons with a hearing or speech impairment may call using their preferred Telecommunications Relay Service.

## Introduction

On August 14, 2024, Primergy Solar Acquisitions, LLC, dba Northern Crescent Solar LLC (Primergy, Northern Crescent or applicant), filed a joint application for a solar facility site permit and a storage facility site permit to construct and operate the Northern Crescent Solar and Storage Project (project), which will consist of an up to 150 megawatt (MW) alternating current (AC) photovoltaic solar energy generating system and a 50 MWac battery energy storage system in Faribault County, Minnesota.<sup>1</sup>

The Minnesota Public Utilities Commission (Commission) issued a notice soliciting comments on August 16, 2024.<sup>2</sup> The notice requests comments concerning the completeness of the joint application, the presence of contested issues, the need for an advisory task force, authorization of the applicant to consult with SHPO, and any additional procedural requirements.

## Project Purpose

Primergy indicates that the project will assist the State of Minnesota in meeting its renewable energy objectives, diversify electricity sources, meet anticipated growth in electricity demand, and meet consumers' growing demand for renewable energy. The project is expected to positively impact the electric grid by providing 50 MW of energy storage capacity, thus allowing output timing to the grid to shift from peak solar generation to peak electric demand. Primergy is working to secure a power purchase agreement, Build Transfer Agreements, Development Transfer Agreements, or other enforceable offtake agreements to sell the generated electricity. The power generated at the facility will be offer for sale to wholesale customers (e.g., Minnesota utilities and cooperatives) and commercial and industrial customers.<sup>3</sup>

## **Project Description**

Primergy proposes to construct and operate an up to 150 MW solar facility and a 50 MW energy storage facility in Verona and Prescott Townships, Faribault County, Minnesota, southeast of the city of

Northern Crescent Solar, LLC. August 18, 2024. *Joint Site Permit Application*, eDocket Nos. <u>20248-209500-01</u> (Cover Letter), <u>20248-209500-03</u> (Joint Site Permit Application), <u>20248-209500-05</u> (Figures), <u>20248-209500-09</u> (Appendix A), <u>20248-209500-11</u> (Appendix B), <u>20248-209500-15</u> (Appendix C), <u>20248-209500-17</u> (Appendix D, Part 1 of 3), <u>20248-209500-19</u> (Appendix D, Part 2 of 3), <u>20248-209501-01</u> (Appendix D, Part 3 of 3), <u>20248-209501-03</u> (Appendix E), <u>20248-209501-05</u> (Appendix F, Part 1 of 2), <u>20248-209501-07</u> (Appendix F, Part 2 of 2), <u>20248-209501-09</u> (Appendix G), <u>20248-209501-11</u> (Appendix H), <u>20248-209501-13</u> (Appendices I), <u>20248-209501-17</u> (Appendix J, Part 1 of 7), <u>20248-209501-19</u> (Appendix J, Part 2 of 7), <u>20248-209502-06</u> (Appendix J, Part 5 of 7), <u>20248-209502-08</u> (Appendix J, Part 6 of 7), <u>20248-209502-10</u> (Appendix J, Part 7 of 7), <u>20248-209502-12</u> (Appendix K, Part 1 of 3), <u>20248-209502-14</u> (Appendix K, Part 2 of 3), and <u>20248-209502-16</u> (Appendix K, Part 3 of 3)(hereinafter "Application").

<sup>&</sup>lt;sup>2</sup> Public Utilities Commission. August 16, 2024. Notice of Comment Period on Application Completeness, eDocket No. <u>20248-209560-01</u>.

<sup>&</sup>lt;sup>3</sup> Application at Section 1.1

Winnebago.<sup>4</sup> The project area encompasses approximately 1,179 acres, the final project design (i.e. preliminary development area) will occupy approximately 929 acres (see Project Overview Map).<sup>5</sup>

The project will use photovoltaic solar panels mounted on single axis tracking systems. Underground collection cables will gather and send the electric power generate by the solar panels to a project substation. The substation will interconnect with the electrical grid via a new switchyard and an overhead generation tie transmission line. The project will also include a battery energy storage facility and associated equipment. The project will include associated facilities, such as, security fencing, access roads, Supervisory Control and Data Acquisition (SCADA), stormwater basins, and an operation and maintenance facility.<sup>6</sup>

The project substation and Xcel switchyard will be constructed in close proximity to each other, and will interconnect to the existing Huntley – Blue Earth 161 kV high voltage transmission line. The land or land rights needed for the Xcel switchyard and interconnection to the grid will be acquired or secured by Northern Crescent Solar and be conveyed to Xcel Energy. Xcel Energy will be responsible for the design, engineering, permitting, construction, and operation of the switchyard.<sup>7</sup>

Northern Crescent indicated a generator interconnection agreement (GIA) from Midcontinent Independent System Operator (MISO) will be needed to connect to the electrical transmission system. The applicant submitted an interconnection request through the MISO Definitive Planning Phase study process in 2020, and a GIA is expected to be in place by the second half of 2024.<sup>8</sup>

## Project Timing and Cost

The applicant is anticipated to begin construction in the second quarter of 2025 with completion and operation anticipated in the winter of 2026. Total project cost is expected to be approximately \$337 million, and annual operating costs are anticipated to be approximately \$4 million.<sup>9</sup>

# Permitting Process and Environmental Review

The project requires a site permit for the solar facility and a site permit for the energy storage facility. A certificate of need is not required for the project.

## Site Permits Required

In Minnesota, no person may construct a large electric power generating plant without a site permit from the Commission.<sup>10</sup> A large electric power generating plant is defined as a facility capable of operating at a capacity of 50 MW or more.<sup>11</sup> Northern Crescent's project will be capable of producing up to 150 MW and therefore requires a site permit from the Commission. Because the project is powered by solar energy, the site permit application qualifies for Commission review under the alternative permitting process described in Minnesota Statute 216E.04, Subd. 2.

- <sup>4</sup> Application at Sections 2.1 and 2.2
- <sup>5</sup> Application at Section 2.1
- <sup>6</sup> Application at Section 2.3.1
- <sup>7</sup> Application at Section 2.3.2
- <sup>8</sup> Application at Section 2.3.2
- <sup>9</sup> Application at Section 2.5
- <sup>10</sup> Minn. Stat. § 216E.03, subd. 1
- <sup>11</sup> Minn. Stat. § 216E.01, subd. 5

In Minnesota, no person may construct an energy storage facility without a site permit from the Commission.<sup>12</sup> An energy storage facility is defined as a facility capable of operating at a capacity of 10 MW or more.<sup>13</sup> Northern Crescent's project will be capable of storing 50 MW of dispatchable energy and therefore requires a site permit from the Commission. Energy storage systems qualify for Commission review under the alternative permitting process described in Minnesota Statute 216E.04, Subd. 2.

A certificate of need (CN) is not required for the project. Solar energy generating systems, as defined in Minn. Statute 216.E01, subdivision 9(a), are exempt from a CN when proposed by an independent power producer.<sup>14</sup> The energy storage portion of the project is also exempt from the CN requirements as it does not meet the definition of a large energy facility as defined in Minn. Statute 216B.2421, subdivision 2(1).

## Site Permit Application and Acceptance

Site permit applications for large electric power generating plants and energy storage systems must provide information about the applicant, a description of the project, and discussion of potential human and environmental impacts and mitigation measures. Review under the alternative permitting process does not require an applicant to propose alternative sites in their permit application; however, if alternative sites were evaluated and rejected, the application must describe these sites and reasons for rejecting them.<sup>15</sup> With an application, the Commission may accept it as complete, reject it and advise the applicant of the deficiencies, or accept it as complete upon filing of supplemental information.

The environmental review and permitting process begins when the Commission determines that a permit application is complete; the Commission has six months (or nine months, with just cause) from the date of this determination to reach a permit decision.<sup>16</sup>

## Public Advisor

Upon acceptance of a site permit application, the Commission must designate a public advisor.<sup>17</sup> The public advisor answers questions about the permitting process but cannot provide legal advice or act as an advocate for any person.

## **Environmental Review**

Site permit applications are subject to environmental review conducted by Department of Commerce, Energy Environmental Review and Analysis (EERA) staff. Projects proceeding under the alternative permitting process require the preparation of an environmental assessment (EA).<sup>18</sup> An EA is a document which contains an overview of the resources affected by a proposed project and describes the potential human and environmental impacts and possible mitigation measures. An EA is the only state

<sup>&</sup>lt;sup>12</sup> Minn. Stat. § 216E.03, subd. 1

<sup>&</sup>lt;sup>13</sup> Minn. Stat. § 216E.01, subd. 3a

<sup>&</sup>lt;sup>14</sup> Minn. Statute 216B.243, Subd.8

<sup>&</sup>lt;sup>15</sup> Minn. Stat. § 216E.04, subd. 3

<sup>&</sup>lt;sup>16</sup> Minn. Stat. § 216E.04, subd. 7

<sup>&</sup>lt;sup>17</sup> Minn. R. 7850.3400.

<sup>&</sup>lt;sup>18</sup> Minn. Stat. § 216E.04, subd. 5

environmental review document required for site permit applications reviewed under the alternative permitting process.<sup>19</sup>

EERA and Commission staff conduct public information and scoping meetings to inform the content of the EA.<sup>20</sup> The Department of Commerce issues the scoping decisions for the EA,<sup>21</sup> and may include alternative sites suggested during the scoping process if they would aid the Commission in making a permit decision.

## Joint Environmental Review

The environmental review process could consider the solar facility and energy storage facility as independent projects, or both components could be considered as a single project that will be constructed and operated together.

## Public Hearing

Site permit applications under the alternative permitting process require that a public hearing be held in the project area after completion and release of the EA.<sup>22</sup> The hearing is typically presided over by an administrative law judge (ALJ) from the Office of Administrative Hearings.

The Commission may request that the ALJ solely provide a summary of public testimony. Alternately, the Commission may request that the ALJ provide a full report with findings of fact, conclusions of law, and recommendations regarding the project.

## Advisory Task Force

The Commission may appoint an advisory task force to aid the environmental review process.<sup>23</sup> An advisory task force must include representatives of local governmental units in the project area.<sup>24</sup> A task force would assist EERA staff with identifying additional sites or impacts and mitigation measures to be evaluated in the EA. A task force expires upon issuance of the EA scoping decision.<sup>25</sup>

The Commission is not required to appoint an advisory task force for every project. If the Commission does not appoint a task force, citizens may request that one be appointed.<sup>26</sup> If such a request is made, the Commission must make this determination at its next regularly scheduled meeting. The decision whether to appoint an advisory task force does not need to be made at the time of application acceptance; however, it should be made as soon as practicable to ensure it can complete its charge prior to issuance of the EA scoping decision.

# Staff Comments and Recommendations

EERA staff provides the following analysis and comments in response to the Commission's notice requesting comments on completeness and other issues related to the site permit application.

<sup>26</sup> *Ibid*.

<sup>&</sup>lt;sup>19</sup> Minn. Stat. § 216E.04, subd. 5

<sup>&</sup>lt;sup>20</sup> Minn. R. 7850.3500.

<sup>&</sup>lt;sup>21</sup> Minn. R. 7850.3700.

<sup>&</sup>lt;sup>22</sup> Minn. R. 7850.3800.

<sup>&</sup>lt;sup>23</sup> Minn. R. 7850.2400.

<sup>&</sup>lt;sup>24</sup> *Ibid*.

<sup>&</sup>lt;sup>25</sup> *Ibid.* 

## Application Completeness

EERA conferred with the applicant about the project, reviewed drafts of the site permit application, and provided comments. These comments were substantially addressed in the application filed with the Commission. Staff evaluated the application against the completeness requirements of Minnesota Rule 7850.3100 (Table 1). The application contains information with respect to these requirements.

Accordingly, staff recommends the Commission accept the application as substantially complete and require Northern Crescent to continue to work with EERA staff and provide supplemental information as necessary throughout the permitting and environmental review processes.

## Joint Environmental Review

The Commission has before it a combined application for a solar facility and an energy storage facility, which are anticipated to be operated as one project. EERA recommends the joint site permit application proceed together, and the project components will be reviewed as being constructed and operated together.

## Contested Issue of Fact

Based on its review of Primergy's application and the record to date, EERA staff has not identified any contested issues of fact. Staff is unaware of any issues or concerns associated with the application or project that require a contested case hearing.

## Procedural Requirements

EERA staff recommends that the Commission request a full ALJ report for the project's public hearing. EERA staff believe that a full ALJ report with recommendations provides an unbiased, efficient, and transparent method to voice and resolve any issues that may emerge as the record is developed. Requiring a full ALJ report reduces the burden on staff and helps to ensure that the Commission has a robust record on which to base its decision. Additionally, a full ALJ report does not significantly lengthen the site permitting process. EERA staff has provided a hypothetical schedule for the permitting process, which includes a full ALJ report with findings, conclusions, and recommendations (see Table 2).

## Advisory Task Force

EERA staff has analyzed the merits of establishing an advisory task force for the project. Staff concludes that a task force is not warranted for the project at this time.

In analyzing the need for an advisory task force for the project, EERA staff considered four characteristics: project size, project complexity, known or anticipated controversy, and sensitive resources.

## **Project Size**

The project will utilize a relatively large area of land – approximately 1,179 acres. However, the concerns associated with such a large acreage are muted, to a great extent, by the fact that land for the project has been assembled by agreements with local landowners interested in and willing to dedicate their land to solar electric production. Northern Crescent has secured all necessary land rights for construction and operation of the project. Thus, this project-size factor does not weigh for or against a task force.

## **Project Complexity**

With respect to energy production and land use, the project is not complex. Though large solar electric projects are fairly new in Minnesota, they are relatively straightforward – solar panels are arranged to gather sunlight and create electric energy, which is then transferred to the electric transmission grid. Land use in the project area is agricultural and the topography is relatively flat. There are no special construction techniques or operational features that make the project complex. This project-complexity factor weighs against a task force.

#### Known or Anticipated Controversy

To date, EERA staff have received no comments concerning the project, and there are currently no public comments in the record. Northern Crescent has conducted outreach with state and federal agencies as well as Minnesota tribal nations and local governments in the project area. The project has been assembled by agreements with local landowners. As a whole, EERA staff does not anticipate controversy with the project.

#### **Sensitive Resources**

There are few sensitive natural resources in the project area. The project area is 96.5 percent agricultural land.<sup>27</sup> The DNR recommends avoidance of MBS Sites of Biodiversity Significance ranked High or Outstanding, none of which are present in the project area. The DNR also recommends avoidance of rare native plant communities.

There are no state-listed endangered or threatened species in the project area. There is the potential for three species to occur within the project area at various stages of federal listing and consideration for listing, one federally listed - the northern long-eared bat, one proposed for federal listing – the tricolor bat, and one candidate species – the monarch butterfly. There are no known roost trees or hibernacula for northern long-eared bats or tricolor bats in Faribault County, but both species may be present throughout the county and project area at times.<sup>28</sup> The project is not anticipated to impact any preferred monarch butterfly habitat, and depending on vegetation management approaches the habitat present under the solar arrays may benefit the species. Potential impacts to sensitive natural resources weigh against a task force.

On whole, staff concludes that a task force is not warranted for the project at this time.

# **EERA Staff Recommendations**

EERA staff recommends that:

- The Commission accept the application as substantially complete.
- The Commission take no action on an advisory task force.
- The Commission request the ALJ provide a full report with findings of fact, conclusions of law, and recommendations regarding the project following the public hearing.

<sup>&</sup>lt;sup>27</sup> Application at Section 5.4.6, Table 26

<sup>&</sup>lt;sup>28</sup> Application at Section 5.4.8

#### Table 1 Completeness Checklist

7850.1900, subp. 2	Section(s)	Comments
A. a statement of proposed ownership of the facility at the time of filing the application and after commercial operation;	1.2.1 and 1.2.2	Satisfactory. Northern Crescent Solar, LLC
B. the precise name of any person or organization to be initially named as permittee or permittees and the name of any other person to whom the permit may be transferred if transfer of the permit is contemplated;	1.2.1 and 1.2.2	Satisfactory. Northern Crescent Solar, LLC
C. at least two proposed sites for the proposed large electric power generating plant and identification of the applicant's preferred site and the reasons for the preference;	Not applicable	The project can use the alternative permitting process of Minnesota Statute 216E.04, which does not require providing this information via Minnesota Rule 7850.3100.
D. a description of the proposed large electric power generating plant and all associated facilities, including the size and type of the facility;	Section 2.0 and Appendix C	Satisfactory
E. the environmental information required under subpart 3.	Se	ee Minn. R. 7850.1900, subpart 3 below.
F. the names of the owners of the property for each proposed site;	Section 1.2.2	Satisfactory. Northern Crescent has lease or easement agreements with all landowners.
G. the engineering and operational design for the large electric power generating plant at each of the proposed sites;	Section 4.0 and Appendix C	Satisfactory
H. a cost analysis of the large electric power generating plant at each proposed site, including the costs of constructing and operating the facility that are dependent on design and site;	Section 2.5	Satisfactory
I. an engineering analysis of each of the proposed sites, including how each site could accommodate expansion of generating capacity in the future;	Sections 3.3 and 4.0	Satisfactory

7850.1900, subp. 2	Section(s)	Comments
J. identification of transportation, pipeline, and electrical transmission systems that will be required to construct, maintain, and operate the facility;	Section 4.0	Satisfactory
K. a listing and brief description of federal, state, and local permits that may be required for the project at each proposed site; and	Section 1.4	Satisfactory
L. a copy of the certificate of need for the project from the Commission or documentation that an application for a certificate of need has been submitted or is not required;	Section 1.5.1	The proposed Northern Crescent Project is exempt and does not need a CN.

# Minnesota Rule 7850.1900, subpart 3. Environmental Information

7850.1900, subp. 3	Section(s)	Comments
A. a description of the environmental setting for each site or route;	Section 5.1	Satisfactory
B. a description of the effects of construction and operation of the facility on human settlement, including, but not limited to, public health and safety, displacement, noise, aesthetics, socioeconomic impacts, cultural values, recreation, and public services;	Section 5.2	Satisfactory
C. a description of the effects of the facility on land-based economies, including, but not limited to, agriculture, forestry, tourism, and mining;	Section 5.3	Satisfactory
D. a description of the effects of the facility on archaeological and historic resources;	Section 5.3.7	Satisfactory
E. a description of the effects of the facility on the natural environment, including effects on air and water quality resources and flora and fauna;	Section 5.4	Satisfactory

7850.1900, subp. 3	Section(s)	Comments
F. a description of the effects of the facility on rare and unique natural resources;	Section 5.4.8	Satisfactory
G. identification of human and natural environmental effects that cannot be avoided if the facility is approved at a specific site or route; and	Section 5.7	Satisfactory
H. a description of measures that might be implemented to mitigate the potential human and environmental impacts identified in items A to G and the estimated costs of such mitigative measures.	Section 5.7	Satisfactory

#### Table 2 Hypothetical Process Schedule

Season*	Day**	Process Step	Responsible Party					
	Pre-application Acceptance							
		Application Filed	Applicant					
с <i>(</i> с. н		Application Completeness Comments	EERA/Agencies/Public					
Summer/Fall 2024	—	Reply Comments	Applicant					
2024		Supplemental Comments	EERA/Agencies/Public					
		Consideration of Application Acceptance	PUC					
		Acceptance to Permit Decision						
	0	Completeness Decision	PUC					
Fall/Winter	5	Meeting Notice/Comment Period Opens	PUC					
2024	25	Public Information and Scoping Meetings	EERA/PUC					
40		Scoping Comment Period Closes	EERA					
Winter 2024	60	Scoping Decision Issued	Commerce					
170		EA Issued	EERA					
190		Public Hearing	EERA/PUC					
Spring 2024	200	Public Hearing Comment Period Ends	EERA					
	210	Responses to Hearing Comments	EERA/Applicant					
	220	Proposed Findings of Fact (FOF)	Applicant					
Spring/Summer	230	Reply Comments / Technical Analysis	EERA					
2025	260	FOF, Conclusions of Law, and Recommendation	OAH					
	275	Exceptions to ALJ Report	Applicant/EERA					
Summer 2025								

\* Seasons: Spring (March to May); Summer (June to August); Fall (September to November); Winter (December to February) and assumes a September or October 2024, Completeness Decision.

\*\* All timeframes are hypothetical and will change. Meetings and hearings will occur over multiple days.



# **CERTIFICATE OF SERVICE**

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

# Minnesota Public Utilities Commission ORDER

Docket Number IP-7135/ESS-24-238; IP-7135/GS-22-57 Dated this 17th day of September, 2024

/s/ Hannah Olson

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.st ate.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_24-238_Official GS-24-238
Jeremy	Duehr	jduehr@fredlaw.com	Fredrikson & Byron, P.A.	60 S Sixth St Ste 1500 Minneapolis, MN 55402-4400	Electronic Service	Yes	OFF_SL_24-238_Official GS-24-238
Sharon	Ferguson	sharon.ferguson@state.mn .us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 551012198	Electronic Service	No	OFF_SL_24-238_Official GS-24-238
Shannon	Hansen	shannon.hansen@westwoo dps.com	Westwood Professional Services	12701 Whitewater Dr Ste 300 Minnetonka, MN 55343	Electronic Service	No	OFF_SL_24-238_Official GS-24-238
Breann	Jurek	bjurek@fredlaw.com	Fredrikson & Byron PA	60 S Sixth St Ste 1500 Minneapolis, MN 55402	Electronic Service	Yes	OFF_SL_24-238_Official GS-24-238
Richard	Kolodziejski	rkolodziejski@ncsrcc.org	North Central States Regional Council of Carpenters	700 Olive St St. Paul, MN 55130	Electronic Service	No	OFF_SL_24-238_Official GS-24-238
Shantal	Pai	spai@fredlaw.com	Fredrikson and Byron, P.A.	60 South Sixth Street Suite 1500 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_24-238_Official GS-24-238
Generic Notice	Residential Utilities Division	residential.utilities@ag.stat e.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_24-238_Official GS-24-238
Nathaniel	Runke	nrunke@local49.org	International Union of Operating Engineers Local 49	611 28th St. NW Rochester, MN 55901	Electronic Service	No	OFF_SL_24-238_Official GS-24-238
Annabel	Sammons	Annabel.Sammons@westw oodps.com	Westwood	12701 Whitewater Dr Ste 300 Minnetonka, MN 55343	Electronic Service	Yes	OFF_SL_24-238_Official GS-24-238

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Zachary	Schoenfeld	zschoenfeld@primergysola r.com	Primergy	1901 Harrison St., Suite 1600 Oakland, CA 94612	Electronic Service		OFF_SL_24-238_Official GS-24-238
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission		Electronic Service		OFF_SL_24-238_Official GS-24-238
David	Weetman	david.weetman@westwood ps.com	Westwood Professional Services	12701 Whitewater Dr Ste 300 Minnetonka, MN 55343	Electronic Service		OFF_SL_24-238_Official GS-24-238

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.st ate.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_22-57_GS-22-57
Jeremy	Duehr	jduehr@fredlaw.com	Fredrikson & Byron, P.A.	60 S Sixth St Ste 1500 Minneapolis, MN 55402-4400	Electronic Service	Yes	OFF_SL_22-57_GS-22-57
Sharon	Ferguson	sharon.ferguson@state.mn .us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 551012198	Electronic Service	No	OFF_SL_22-57_GS-22-57
Shannon	Hansen	shannon.hansen@westwoo dps.com	Westwood Professional Services	12701 Whitewater Dr Ste 300 Minnetonka, MN 55343	Electronic Service	No	OFF_SL_22-57_GS-22-57
Breann	Jurek	bjurek@fredlaw.com	Fredrikson & Byron PA	60 S Sixth St Ste 1500 Minneapolis, MN 55402	Electronic Service	Yes	OFF_SL_22-57_GS-22-57
Shantal	Pai	spai@fredlaw.com	Fredrikson and Byron, P.A.	60 South Sixth Street Suite 1500 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_22-57_GS-22-57
Generic Notice	Residential Utilities Division	residential.utilities@ag.stat e.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_22-57_GS-22-57
Annabel	Sammons	Annabel.Sammons@westw oodps.com	Westwood	12701 Whitewater Dr Ste 300 Minnetonka, MN 55343	Electronic Service	Yes	OFF_SL_22-57_GS-22-57
Zachary	Schoenfeld	zschoenfeld@primergysola r.com	Primergy	1901 Harrison St., Suite 1600 Oakland, CA 94612	Electronic Service	No	OFF_SL_22-57_GS-22-57
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th PI E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_22-57_GS-22-57

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
David	Weetman	david.weetman@westwood ps.com	Westwood Professional Services	12701 Whitewater Dr Ste 300 Minnetonka, MN 55343	Electronic Service	No	OFF_SL_22-57_GS-22-57