

December 15, 2020

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

RE: **Comments of the Minnesota Department of Commerce, Division of Energy Resources**  
Docket No. IP7014/CN-19-486

Dear Mr. Seuffert:

Attached are the comments of the Minnesota Department of Commerce, Division of Energy Resources (Department) in the following matter:

In the Matter of the Application of Red Rock Solar, LLC for a Certificate of Need for the up to 60-MW Red Rock Solar Project in Cottonwood County

The Application was filed on November 9, 2020 by:

Christina K. Brusven  
Fredrikson & Byron, P.A.  
200 South Sixth Street, Suite 4000  
Minneapolis, MN 55402

The Department **recommends that the Minnesota Public Utilities Commission (Commission) determine that the Application is complete.** The Department is available to answer any questions the Commission may have.

Sincerely,

/s/ MATTHEW LANDI  
Rates Analyst

ML/ar  
Attachment



## Before the Minnesota Public Utilities Commission

### Comments of the Minnesota Department of Commerce Division of Energy Resources

Docket No. IP7014/CN-19-486

#### I. BACKGROUND

On June 19, 2019, Big Bend Wind, LLC and Red Rock Solar, LLC (RRS, or the Applicant), an affiliate of Apex Clean Energy Holdings, LLC, submitted a *Request for Exemption from Certain Application Content Requirements and Rule 7829.2550 HVTL Notice Plan* (Exemption Petition) to the Minnesota Public Utilities Commission (Commission).

On July 8, 2019, the Commission issued its *Notice of Comment Period on Request for Exemptions from Certain Filing Requirements* (July 8, 2019 Notice).

On July 22, 2019, the Department of Commerce, Division of Energy Resources, Energy Regulation and Planning Group (Department, or DOC-DER) filed its comments on the Exemption Petition, recommending approval of the Applicant's data exemption requests with conditions.

On July 29, 2019, the Applicant filed its reply comments, agreeing with the Department's recommendations with respect to the data exemption requests.

On August 13, 2019, the Commission bifurcated the Big Bend Wind and Red Rock Solar projects into two separate dockets: Docket No. IP7013/CN-19-408 and Docket No. IP7014/CN-19-486, respectively. On August 14, 2019, DOC-DER's initial comments in response to the Commission's July 8, 2019 Notice were published in this proceeding, Docket No. IP7014/CN-19-486. Additionally, the Applicant's reply comments were published in this proceeding.

On September 24, 2019, the Commission issued its Order (September 24 Order) adopting the Department's recommendations with respect to the Exemption Petition and approved the following full exemptions, conditional exemptions, and partial exemptions, respectively:

1. The Commission grants exemptions to the following rules as requested by Applicants:
  - a. 7849.0250 (B) (1)
  - b. 7849.0250 (D)
  - c. 7849.0290
  - d. 7849.0330
2. The Commission grants exemptions to the following rules on the condition that if a power purchase agreement is executed prior to application submittal or during the pendency of the certificate of need proceeding, the Applicants must provide equivalent data from any purchaser or any alternative data proposed by the Applicant:

- a. 7949.0240, subp. 2 (B)
  - b. 7849.0250 (B) (2), (3), and (5)
  - c. 7849.0250 (C) (7)
  - d. 7849.0270
  - e. 7849.0280
  - f. 7849.0300
  - g. 7849.0340
3. The Commission grants exemptions to the following rules, such that the information to be provided is limited to renewable, sustainable, or clean energy alternatives:
- a. 7849.0250 (B) (4)
  - b. 7849.0250 (C) (1) to (6), (8), and (9)

On November 9, 2020, RRS filed its *Certificate of Need Application for a Solar Energy Conversion System* (Application) for the up to 60 megawatts (MW) Red Rock Solar, LLC solar energy conversion facility.<sup>1</sup>

On November 23, 2020, the Commission issued a *Notice of Comment Period* (Notice) requesting comments on the completeness of the Application. The Notice listed the following topics as open for comment:

- Does the certificate of need application contain the information required under Minn. R. 7849.0220, subp. 1?
- Does the site permit application contain the information required under Minn. R. 7850.3100?
- Should the certificate of need application be evaluated using the Commission's informal process or referred to the Office of Administrative Hearings (OAH) for a contested case hearing?
- Should an advisory task force be appointed for the site permit application?
- Should the site permit application be processed jointly with the certificate of need application (i.e., public meetings, environmental review, and public hearings)?
- Should the environmental report required under the certificate of need process be combined with the environmental assessment required for the transmission line?
- Are there any contested issues of fact with respect to the representations made in the applications?
- Should the Commission hold joint proceedings on the Big Bend Wind and Red Rock Solar projects?
- Are there other issues or concerns related to this matter?

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<sup>1</sup> [Red Rock Solar Certificate of Need Application](#), dated November 9, 2020, Docket No. IP7014/CN-19-486 (Application).

The Department provides comments below.

## II. DEPARTMENT ANALYSIS

### A. CN REVIEW PROCESS

Minnesota Statutes, section 216B.2421, subd. 2 (1) defines a large energy facility as “any electric power generating plant or combination of plants at a single site with a combined capacity of 50,000 kilowatts or more and transmission lines directly associated with the plant that are necessary to interconnect the plant to the transmission system.” Further, Minnesota Statutes, section 216B.243, subd. 2 states that, “no large energy facility shall be sited or constructed in Minnesota without the issuance of a certificate of need by the commission.” The Application indicates that RRS plans to construct the Red Rock Solar project, an up to 60 MW solar energy generating system on approximately 483 acres of land in Cottonwood County, Minnesota. Therefore, a CN is required.

The Commission’s review of CN applications primarily consists of two steps:

1. Determine whether the application meets certain content requirements;
2. Based on a complete application, determine whether the facility is needed, and if so, grant the CN.

At this stage in RRS’s CN proceeding, the Commission is on the first step.

The Department’s Energy Environmental Review and Analysis group (DOC-EERA) provides analysis related to site permit applications and is a separate regulatory process from the DOC-DER analysis of certificate of need applications.

### B. CONTENT REQUIREMENTS FOR RED ROCK SOLAR

Minn. R. 7849.0220, subp. 1, states that each CN application “shall include all of the information required by parts 7849.0240, 7849.0250, and 7849.0270 to 7849.0340.” However, Minn. R. 7849.0200, subp. 6, allows for exemptions from any of the content requirements of CN applications if the applicant demonstrates that the requirement is not necessary for determining whether the facility is needed.

The Department reviewed the Application for completeness considering the rule requirements and exemptions granted by the Commission in its September 24 Order. Below is a table that summarizes the Department’s completeness review of the Application, indicating what data and information is required by Minnesota Rules, the location of that data and information in the Application, whether RRS was granted an exemption to the applicable Minnesota Rule, and whether the Application contained the relevant data and information.

**Table 1: Filing Requirements Completeness Review**

| MN Rule             | Short Description  | Exemption?  | Location in Application           | Complete? |
|---------------------|--|-------------|-----------------------------------|-----------|
| 7849.0240 (1)       | Need Summary   | No          | 3.0                               | Yes       |
| 7849.0240(2)(A)     | Additional Considerations:<br>Socially Beneficial Uses         | No          | 3.2.1                             | Yes       |
| 7849.0240(2)(B)     | Additional Considerations:<br>Promotional Activities           | Conditional | 3.2.2                             | Yes       |
| 7849.0240(2)(C)     | Additional Considerations:<br>Future Development               | No          | 3.2.3                             | Yes       |
| 7849.0250(A)(1)-(5) | Description of Project   | No          | 5.1.1-5.1.5                       | Yes       |
| 7849.0250(B)(1)     | Description of Alternatives:<br>Purchased Power                | Full        | 5.2.1.1                           | Yes       |
| 7849.0250(B)(2)     | Description of Alternatives:<br>Existing Facility Efficiencies | Conditional | 5.2.1.2                           | Yes       |
| 7849.0250(B)(3)     | Description of Alternatives:<br>New Transmission               | Conditional | 5.2.1.3                           | Yes       |
| 7849.0250(B)(4)     | Description of Alternatives: New<br>Generating Facilities      | Partial     | 5.1.2.4-<br>5.1.2.7               | Yes       |
| 7849.0250(B)(5)     | Description of Alternatives:<br>Combinations                   | Conditional | 5.2.1.10                          | Yes       |
| 7849.0250(C)(1)-(6) | Alternatives Details   | Partial     | 5.3.1-5.3.6,<br>and Appendix<br>A | Yes       |
| 7849.0250(C)(7)     | Alternatives Details:<br>Effect on Rates                       | Conditional | 5.3.7                             | Yes       |
| 7849.0250(C)(8)-(9) | Alternatives Details   | Partial     | 5.3, 5.3.8                        | Yes       |
| 7849.0250(D)        | System Map   | Full        | 5.4                               | Yes       |
| 7849.0270           | Peak Demand and Annual<br>Consumption Forecast                 | Conditional | 6.0                               | Yes       |
| 7849.0280           | System Capacity  | Conditional | 7.0                               | Yes       |
| 7849.0290           | Conservation Programs  | Full        | 8.0                               | Yes       |
| 7849.0300           | Consequences of Delay  | Conditional | 9.0                               | Yes       |
| 7849.0310           | Environmental Information                                      | No          | 10.0                              | Yes       |
| 7849.0320           | Generating Facilities Information                              | No          | 11.0                              | Yes       |
| 7849.0330           | Transmission Facilities<br>Information                         | Full        | 5.2.1.10                          | Yes       |
| 7849.0340           | No-Facility Alternative  | Conditional | 5.2.1.9                           | Yes       |

The Department notes that this evaluation of the completeness of the Application does not affect its analysis regarding the merits of the Project, nor does it relieve RRS from providing any additional information requested by the Department.

**The Department recommends that the Commission determine that the Application is complete.**

*C. PROCESS REVIEW*

In addition to the completeness of the Application, the Commission also listed the following topics as open for comment:

- Should the certificate of need application be evaluated using the Commission's informal process or referred to the Office of Administrative Hearings (OAH) for a contested case hearing?
- Should the site permit application be processed jointly with the certificate of need application (i.e., public meetings, environmental review, and public hearings)?
- Are there any contested issues of fact with respect to the representations made in the applications?
- Should the Commission hold joint proceedings on the Big Bend Wind and Red Rock Solar projects?
- Are there other issues or concerns related to this matter?

*1. THE COMMISSION'S NORMAL PROCESS OF INFORMAL COMMENTS AND REPLY COMMENTS*

The Department does not anticipate significant disputes in this proceeding as it relates to the Department's need analysis. Therefore, the Department concludes that reliance on the Commission's normal process of informal comments and reply comments will be sufficient to develop the issues in this proceeding.

*2. JOINT PUBLIC HEARINGS*

Minnesota Statute 216B.243, subd. 4 states the following:

Any person proposing to construct a large energy facility shall apply for a certificate of need and for a site or route permit under chapter 216E prior to construction of the facility. The application shall be on forms and in a manner established by the commission. In reviewing each application the commission shall hold at least one public hearing pursuant to chapter 14. The public hearing shall be held at a location and hour reasonably calculated to be convenient for the public. An objective of the public hearing shall be to obtain public opinion on the necessity of granting a

certificate of need and, if a joint hearing is held, a site or route permit. The commission shall designate a commission employee whose duty shall be to facilitate citizen participation in the hearing process. Unless the commission determines that a joint hearing on siting and need under this subdivision and section 216E.03, subdivision 6, is not feasible or more efficient, or otherwise not in the public interest, a joint hearing under those subdivisions shall be held.

Minn. Stat. §216B.243, subd. 4 expresses a preference for a joint public hearing (or hearings) of the site, route, and certificate of need applications. Accordingly, the Department expresses support for at least one joint public hearing be held for the certificate of need, site, and route permits. Joint public hearings may help the general public understand the full scope of the Project and facilitate more meaningful participation in the Commission's review of the Project. The Department will be available to participate in such a hearing (or hearings).

The Department maintains that the certificate of need application can be evaluated using the Commission's normal process of informal comments and reply comments.

#### *D. JOINT REVIEW OF THE RED ROCK SOLAR AND BIG BEND WIND PROJECTS*

The Applicant requested that the Commission order a joint regulatory review process for the Big Bend Wind Route Permit, Site Permit, and Certificate of Need applications, and Red Rock Solar Site Permit and Certificate of Need applications.<sup>2</sup> The Applicant stated that the Big Bend Wind and Red Rock Solar projects are the state's first utility-scale hybrid renewable energy facility and shared transmission line. The Applicant argued that "holding a joint proceeding is in the public interest because it will make it easier for members of the public to participate in the proceedings, provide a comprehensive record of all benefits, impacts, and minimization measures related to this hybrid renewable energy project and improve administrative efficiency."<sup>3</sup>

In support of their request, the Applicants cited Minn. Stat. §216B.243, subd. 4 and Minn. R. 7489.1900, subp. 4. In review of the applicable Minnesota Statutes and Rules, the Department is not opposed to a joint regulatory review process. However, the Department maintains the conclusion that the Commission's normal process of informal comments and reply comments will be more efficient and less burdensome for participants for the evaluation of the certificate of need applications for both the Red Rock Solar and Big Bend Wind projects.<sup>4</sup> The Department is not opposed to evaluating the certificate of need applications for both the Red Rock Solar and Big Bend Wind projects in a joint regulatory review process.

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<sup>2</sup> Application, Section 2.6, at 4.

<sup>3</sup> *Id.*

<sup>4</sup> The Department similarly concluded that the Commission's normal process of informal comments and reply comments can be used to evaluate the Big Bend Wind, LLC project (Docket No. IP7013/CN-19-408).

**The Department recommends that the Commission require that at least one joint public hearing be held for the certificate of need, site, and route permits of both the Big Bend Wind and Red Rock Solar projects.**

*E. OTHER ISSUES*

The Department is not aware of any other issues or concerns related to this matter at this time.

**III. DEPARTMENT RECOMMENDATIONS**

The Department recommends that the Commission determine that the Application is complete.

The Department recommends that the Commission evaluate the Application using the Commission's normal process of informal comments and reply comments.

The Department recommends that the Commission require that at least one joint public hearing be held for the certificate of need, site, and route permits of both the Big Bend Wind and Red Rock Solar projects.

/ar



## **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. IP7014/CN-19-486 and IP7014/GS-19-620**

Dated this **15<sup>th</sup>** day of **December 2020**

**/s/Sharon Ferguson**

| First Name     | Last Name          | Email                                | Company Name                       | Address   | Delivery Method    | View Trade Secret | Service List Name       |
|----------------|--------------------|--------------------------------------|------------------------------------|---|--------------------|-------------------|-------------------------|
| Christina      | Brusven            | cbrusven@fredlaw.com                 | Fredrikson Byron                   | 200 S 6th St Ste 4000<br><br>Minneapolis,<br>MN<br>554021425                      | Electronic Service | Yes               | OFF_SL_19-486_CN-19-486 |
| Generic Notice | Commerce Attorneys | commerce.attorneys@ag.state.mn.us    | Office of the Attorney General-DOC | 445 Minnesota Street Suite 1400<br><br>St. Paul,<br>MN<br>55101                   | Electronic Service | Yes               | OFF_SL_19-486_CN-19-486 |
| Kate           | Fairman            | kate.frantz@state.mn.us              | Department of Natural Resources    | Box 32<br>500 Lafayette Rd<br>St. Paul,<br>MN<br>551554032                        | Electronic Service | No                | OFF_SL_19-486_CN-19-486 |
| Annie          | Felix Gerth        | annie.felix-gerth@state.mn.us        |                                    | Board of Water & Soil Resources<br>520 Lafayette Rd<br>Saint Paul,<br>MN<br>55155 | Electronic Service | No                | OFF_SL_19-486_CN-19-486 |
| Sharon         | Ferguson           | sharon.ferguson@state.mn.us          | Department of Commerce             | 85 7th Place E Ste 280<br><br>Saint Paul,<br>MN<br>551012198                      | Electronic Service | No                | OFF_SL_19-486_CN-19-486 |
| Lucas          | Franco             | lfranco@liunagro.com                 | LIUNA                              | 81 Little Canada Rd E<br><br>Little Canada,<br>MN<br>55117                        | Electronic Service | No                | OFF_SL_19-486_CN-19-486 |
| Brenna         | Gunderson          | Brenna.gunderson@apexcleanenergy.com | Apex Clean Eenergy                 | 8665 Hudson Blvd N Ste 110<br><br>Lake Elmo,<br>MN<br>55042                       | Electronic Service | Yes               | OFF_SL_19-486_CN-19-486 |
| Kate M         | Heins              | kate.heins@apexcleanenergy.com       | Apex Clean Energy                  | 310 4th St NE Ste 200<br><br>Charlottesville,<br>VA<br>22902                      | Electronic Service | Yes               | OFF_SL_19-486_CN-19-486 |
| Kari           | Howe               | kari.howe@state.mn.us                | DEED                               | 332 Minnesota St, #E200<br>1ST National Bank Bldg<br>St. Paul,<br>MN<br>55101     | Electronic Service | No                | OFF_SL_19-486_CN-19-486 |
| Dylan          | Ikkala             | dylan.ikkala@apexcleanenergy.com     | Apex Clean Energy                  | 8665 Hudson Blvd N Ste 110<br><br>Lake Elmo,<br>MN<br>55042                       | Electronic Service | Yes               | OFF_SL_19-486_CN-19-486 |

| First Name     | Last Name                      | Email                                | Company Name                              | Address   | Delivery Method    | View Trade Secret | Service List Name       |
|----------------|--------------------------------|--------------------------------------|---|---|--------------------|-------------------|-------------------------|
| Ray            | Kirsch                         | Raymond.Kirsch@state.mn.us           | Department of Commerce                    | 85 7th Place E Ste 500<br><br>St. Paul,<br>MN<br>55101                  | Electronic Service | No                | OFF_SL_19-486_CN-19-486 |
| Karen          | Kromar                         | karen.kromar@state.mn.us             | MN Pollution Control Agency               | 520 Lafayette Rd<br><br>Saint Paul,<br>MN<br>55155                      | Electronic Service | No                | OFF_SL_19-486_CN-19-486 |
| Chris          | Kunkle                         | chris.kunkle@apexcleanenergy.com     | Apex Clean Energy                         | 8665 Hudson Blvd North,<br>Suite 110<br><br>Lake Elmo,<br>MN<br>55042   | Electronic Service | No                | OFF_SL_19-486_CN-19-486 |
| Susan          | Medhaug                        | Susan.medhaug@state.mn.us            | Department of Commerce                    | Suite 280, 85 Seventh<br>Place East<br><br>St. Paul,<br>MN<br>551012198 | Electronic Service | No                | OFF_SL_19-486_CN-19-486 |
| Generic Notice | Residential Utilities Division | residential.utilities@ag.state.mn.us | Office of the Attorney General-RUD        | 1400 BRM Tower<br>445 Minnesota St<br>St. Paul,<br>MN<br>551012131      | Electronic Service | Yes               | OFF_SL_19-486_CN-19-486 |
| Stephan        | Roos                           | stephan.roos@state.mn.us             | MN Department of Agriculture              | 625 Robert St N<br><br>Saint Paul,<br>MN<br>55155-2538                  | Electronic Service | No                | OFF_SL_19-486_CN-19-486 |
| Will           | Seuffert                       | Will.Seuffert@state.mn.us            | Public Utilities Commission               | 121 7th Pl E Ste 350<br><br>Saint Paul,<br>MN<br>55101                  | Electronic Service | Yes               | OFF_SL_19-486_CN-19-486 |
| Haley          | Waller Pitts                   | hwallerpitts@fredlaw.com             | Fredrikson & Byron, P.A.                  | 200 S 6th St Ste 4000<br><br>Minneapolis,<br>MN<br>55402                | Electronic Service | Yes               | OFF_SL_19-486_CN-19-486 |
| Cynthia        | Warzecha                       | cynthia.warzecha@state.mn.us         | Minnesota Department of Natural Resources | 500 Lafayette Road<br>Box 25<br>St. Paul,<br>Minnesota<br>55155-4040    | Electronic Service | No                | OFF_SL_19-486_CN-19-486 |

| First Name     | Last Name                      | Email                                | Company Name                       | Address  | Delivery Method    | View Trade Secret | Service List Name       |
|----------------|--------------------------------|--------------------------------------|------------------------------------|--|--------------------|-------------------|-------------------------|
| Christina      | Brusven                        | cbrusven@fredlaw.com                 | Fredrikson Byron                   | 200 S 6th St Ste 4000<br><br>Minneapolis,<br>MN<br>554021425       | Electronic Service | Yes               | OFF_SL_19-620_GS-19-620 |
| Generic Notice | Commerce Attorneys             | commerce.attorneys@ag.state.mn.us    | Office of the Attorney General-DOC | 445 Minnesota Street Suite 1400<br><br>St. Paul,<br>MN<br>55101    | Electronic Service | Yes               | OFF_SL_19-620_GS-19-620 |
| Sharon         | Ferguson                       | sharon.ferguson@state.mn.us          | Department of Commerce             | 85 7th Place E Ste 280<br><br>Saint Paul,<br>MN<br>551012198       | Electronic Service | No                | OFF_SL_19-620_GS-19-620 |
| Brenna         | Gunderson                      | Brenna.gunderson@apexcleanenergy.com | Apex Clean Eenergy                 | 8665 Hudson Blvd N Ste 110<br><br>Lake Elmo,<br>MN<br>55042        | Electronic Service | No                | OFF_SL_19-620_GS-19-620 |
| Kate M         | Heins                          | kate.heins@apexcleanenergy.com       | Apex Clean Energy                  | 310 4th St NE Ste 200<br><br>Charlottesville,<br>VA<br>22902       | Electronic Service | No                | OFF_SL_19-620_GS-19-620 |
| Chris          | Kunkle                         | chris.kunkle@apexcleanenergy.com     | Apex Clean Energy                  | 8665 Hudson Blvd North, Suite 110<br><br>Lake Elmo,<br>MN<br>55042 | Electronic Service | No                | OFF_SL_19-620_GS-19-620 |
| Generic Notice | Residential Utilities Division | residential.utilities@ag.state.mn.us | Office of the Attorney General-RUD | 1400 BRM Tower<br>445 Minnesota St<br>St. Paul,<br>MN<br>551012131 | Electronic Service | Yes               | OFF_SL_19-620_GS-19-620 |
| Will           | Seuffert                       | Will.Seuffert@state.mn.us            | Public Utilities Commission        | 121 7th PI E Ste 350<br><br>Saint Paul,<br>MN<br>55101             | Electronic Service | Yes               | OFF_SL_19-620_GS-19-620 |
| Haley          | Waller Pitts                   | hwallerpitts@fredlaw.com             | Fredrikson & Byron, P.A.           | 200 S 6th St Ste 4000<br><br>Minneapolis,<br>MN<br>55402           | Electronic Service | No                | OFF_SL_19-620_GS-19-620 |

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| Christina      | Brusven            | cbrusven@fredlaw.com                 | Fredrikson Byron                   | 200 S 6th St Ste 4000<br><br>Minneapolis,<br>MN<br>554021425                      | Electronic Service | Yes               | OFF_SL_19-408_CN-19-408 |
| Generic Notice | Commerce Attorneys | commerce.attorneys@ag.state.mn.us    | Office of the Attorney General-DOC | 445 Minnesota Street Suite 1400<br><br>St. Paul,<br>MN<br>55101                   | Electronic Service | Yes               | OFF_SL_19-408_CN-19-408 |
| Kate           | Fairman            | kate.frantz@state.mn.us              | Department of Natural Resources    | Box 32<br>500 Lafayette Rd<br>St. Paul,<br>MN<br>551554032                        | Electronic Service | No                | OFF_SL_19-408_CN-19-408 |
| Annie          | Felix Gerth        | annie.felix-gerth@state.mn.us        |                                    | Board of Water & Soil Resources<br>520 Lafayette Rd<br>Saint Paul,<br>MN<br>55155 | Electronic Service | No                | OFF_SL_19-408_CN-19-408 |
| Sharon         | Ferguson           | sharon.ferguson@state.mn.us          | Department of Commerce             | 85 7th Place E Ste 280<br><br>Saint Paul,<br>MN<br>551012198                      | Electronic Service | No                | OFF_SL_19-408_CN-19-408 |
| Lucas          | Franco             | lfranco@liunagro.com                 | LIUNA                              | 81 Little Canada Rd E<br><br>Little Canada,<br>MN<br>55117                        | Electronic Service | No                | OFF_SL_19-408_CN-19-408 |
| Brenna         | Gunderson          | Brenna.gunderson@apexcleanenergy.com | Apex Clean Eenergy                 | 8665 Hudson Blvd N Ste 110<br><br>Lake Elmo,<br>MN<br>55042                       | Electronic Service | Yes               | OFF_SL_19-408_CN-19-408 |
| Kate M         | Heins              | kate.heins@apexcleanenergy.com       | Apex Clean Energy                  | 310 4th St NE Ste 200<br><br>Charlottesville,<br>VA<br>22902                      | Electronic Service | Yes               | OFF_SL_19-408_CN-19-408 |
| Kari           | Howe               | kari.howe@state.mn.us                | DEED                               | 332 Minnesota St, #E200<br>1ST National Bank Bldg<br>St. Paul,<br>MN<br>55101     | Electronic Service | No                | OFF_SL_19-408_CN-19-408 |
| Dylan          | Ikkala             | dylan.ikkala@apexcleanenergy.com     | Apex Clean Energy                  | 8665 Hudson Blvd N Ste 110<br><br>Lake Elmo,<br>MN<br>55042                       | Electronic Service | Yes               | OFF_SL_19-408_CN-19-408 |

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|----------------|--------------------------------|--------------------------------------|---|---|--------------------|-------------------|-------------------------|
| Ray            | Kirsch                         | Raymond.Kirsch@state.mn.us           | Department of Commerce                    | 85 7th Place E Ste 500<br><br>St. Paul,<br>MN<br>55101                  | Electronic Service | No                | OFF_SL_19-408_CN-19-408 |
| Karen          | Kromar                         | karen.kromar@state.mn.us             | MN Pollution Control Agency               | 520 Lafayette Rd<br><br>Saint Paul,<br>MN<br>55155                      | Electronic Service | No                | OFF_SL_19-408_CN-19-408 |
| Chris          | Kunkle                         | chris.kunkle@apexcleanenergy.com     | Apex Clean Energy                         | 8665 Hudson Blvd North,<br>Suite 110<br><br>Lake Elmo,<br>MN<br>55042   | Electronic Service | No                | OFF_SL_19-408_CN-19-408 |
| Susan          | Medhaug                        | Susan.medhaug@state.mn.us            | Department of Commerce                    | Suite 280, 85 Seventh<br>Place East<br><br>St. Paul,<br>MN<br>551012198 | Electronic Service | No                | OFF_SL_19-408_CN-19-408 |
| Generic Notice | Residential Utilities Division | residential.utilities@ag.state.mn.us | Office of the Attorney General-RUD        | 1400 BRM Tower<br>445 Minnesota St<br>St. Paul,<br>MN<br>551012131      | Electronic Service | Yes               | OFF_SL_19-408_CN-19-408 |
| Stephan        | Roos                           | stephan.roos@state.mn.us             | MN Department of Agriculture              | 625 Robert St N<br><br>Saint Paul,<br>MN<br>55155-2538                  | Electronic Service | No                | OFF_SL_19-408_CN-19-408 |
| Will           | Seuffert                       | Will.Seuffert@state.mn.us            | Public Utilities Commission               | 121 7th Pl E Ste 350<br><br>Saint Paul,<br>MN<br>55101                  | Electronic Service | Yes               | OFF_SL_19-408_CN-19-408 |
| Haley          | Waller Pitts                   | hwallerpitts@fredlaw.com             | Fredrikson & Byron, P.A.                  | 200 S 6th St Ste 4000<br><br>Minneapolis,<br>MN<br>55402                | Electronic Service | Yes               | OFF_SL_19-408_CN-19-408 |
| Cynthia        | Warzecha                       | cynthia.warzecha@state.mn.us         | Minnesota Department of Natural Resources | 500 Lafayette Road<br>Box 25<br>St. Paul,<br>Minnesota<br>55155-4040    | Electronic Service | No                | OFF_SL_19-408_CN-19-408 |

| First Name | Last Name | Email          | Company Name | Address   | Delivery Method    | View Trade Secret | Service List Name                     |
|------------|-----------|----------------|--------------|---|--------------------|-------------------|---------------------------------------|
| Berdon     | Baerg     | bbaerg@msn.com |              | B&A Baerg Farms, LLC<br>4758 Watermark LN<br>Sarasota,<br>FL<br>34238 | Electronic Service | No                | SPL_SL_19-408_Project<br>Contact List |